



State of Ohio Environmental Protection Agency

Southeast District Office

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Logan, Ohio 43138

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Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

May 28, 2010

RE: **PIKE COUNTY
FAC - PIKE SANITATION LANDFILL
EXP**

Pike Sanitation, Inc.
123 South Lock Street
Waverly, Ohio 45690

Attn.: Michael Migyanko

RE: **Pike Sanitation Landfill - Response to April 27, 2010 Quarterly
Gas Monitoring Report - NOTICE OF VIOLATION**

Dear Mr. Migyanko:

The Southeast District Office (SEDO) of the Ohio Environmental Protection Agency (Ohio EPA) has completed a review of the explosive gas monitoring results for the Pike Sanitation Landfill (Pike) received in this office on April 30, 2010. This report was submitted by SCS Engineers on behalf of Pike Sanitation Landfill. These results are from a sampling event on April 16, 2010. The data was reviewed for compliance with Ohio Administrative Code (OAC) Rule 3745-27-12.

Detectable levels of explosive gas were reported at GMP-1, GMP-2, GMP-3, GMP-11, GMP-15, and BP-1. However, the reported paired values of % gas by volume and % lower explosive limit (LEL) appear to conflict with one another. GMP-2 and GMP-3 were both reported having gas by volume of 1%, but the LEL values were 0. GMP-11 gas by volume was 1% and the LEL was 1% as well. BP-1 gas by volume was 1%, but the LEL value was 0.2%.

None of these paired data sets appears to coincide with each other. Since the LEL of methane is 5% by volume, a reading of 1% gas by volume should have a corresponding value of 20% LEL.

Part 2 Section (F)(2) (page 12) - "Evaluation of Sampling Results" of Pike's current Explosive Gas Monitoring Plan, approved on July 28, 2005, contains the following text:

"After testing (sampling) has been completed, the results should be scanned to identify possible anomalous readings. If such readings are evident, the monitor in question should be retested to verify results."

It is our understanding that the GEM 2000, the monitor used during the sampling event, reports both % gas by volume and % LEL. The readings in question were clearly anomalous, but were not verified.

Pike is in violation of **OAC Rule 3745-27-19(B)(2)**:

The owner or operator shall conduct all construction and operation at a sanitary landfill facility in strict compliance with the applicable authorizing document, including permit to install, a plan approval...

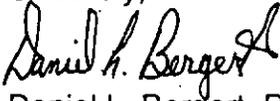
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Pike failed to follow their approved monitoring plan to verify anomalous results. The reported values should have cued the technician that the meter was either not properly calibrated or not functioning properly. It further calls all data collected during the sampling event into question.

Pike should arrange for the site to be resampled for explosive gas for the current quarter. Ensure that the meter and equipment are functional and properly calibrated. The technician should be properly trained on its usage and familiar with the approved monitoring plan, and be provided with adequate oversight/supervision.

Please respond in writing to this letter within ten days detailing your actions taken to correct the above-noted violation. If you have any questions, please contact me at (740) 380-5438.

Sincerely,



Daniel L. Bergert, R. S.
Environmental Specialist II
Division of Solid and Infectious Waste Management

DLB/jg

cc: Pike County General Health District
cc: Brian Queen, SEDO-DSIWM
cc: C. E. Satchwill, SCS Engineers