



State of Ohio Environmental Protection Agency

**Southwest District Office**

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Preble  
Preble LF  
Ground Water

January 4, 2008

Mr. Tom Barnes  
Sanitary Facilities Manager  
Preble County Landfill  
4239 U.S. Route 127 South  
Eaton, Ohio 45320

**Re: SZ-2 Assessment Appendix I and II Sampling, Preble  
County Landfill, October 18, 2007**

Dear Mr. Barnes:

At the request of the Division of Solid and Infectious Waste (DSIWM), the Division of Drinking and Ground Water (DDAGW) has reviewed the SZ-2 Assessment Sampling Results. This document was received by the Ohio EPA South West District Office (SWDO), DSIWM on October 19, 2007 and a second copy to DDAGW on October 22, 2007 for the *Preble County Landfill*. The following violation and deficiency are a result of that review.

**Notice of Violation**

1. **The owner/operator of the Preble County Landfill is in violation of Ohio Administrative Code (OAC) Rule 3745-27-10(C)(10).** Wells SZ-2, SZ-4R, and SZ-1 were sampled for Appendix I and II parameters on August 2, 2007, requiring a submittal date of October 16, 2007. The analytical results for the Preble County Landfill were received October 19, 2007, three (3) days after the required date. This is a violation of OAC Rule 3745-27-10(C)(10), which requires the submittal of analytical results within 75-days of sampling. To prevent this violation from reoccurring the owner/operator of Preble County Landfill needs to submit all future analytical results within 75-days of the sampling event in accordance with Ohio Administrative Code (OAC) Rule 3745-27-10(C)(10).

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**Notice of Deficiency**

- 2. The owner/operator of the Preble County Landfill did not provide sufficient information regarding the identification of all constituents that have been detected in accordance with OAC Rule 3745-27-10(E)(5)(c).** Detectable concentrations of toluene at 1.1 ug/L were reported in well SZ-4R during the August 2, 2007 assessment sampling event. There was no discussion provided on the detection of toluene in well SZ-4R. The document titled *Fall 2007 Semiannual Sampling Event and Statistical Evaluation* which was received on December 4 2007, reported toluene as non detect (>1.0 ug/L) in well SZ-4R which was sampled on September 25, 2007. It is unclear whether the facility intended to use the September sampling result as a resample / confirmation sample, semiannual sample, or both. The Preble County Landfill needs to provide a discussion on the detection of toluene in well SZ-4R in accordance with OAC Rule 3745-27-10(E)(5)(c).

Please respond in writing within thirty (30) days. If you have any questions please contact Greg Brown at (937) 285-6407.

Sincerely,



Jill Olberding, R.S.  
Division of Solid and Infectious Waste Management

cc: Gary Walker, Preble County Health Department  
Scott Blanchard, Brown and Caldwell  
Greg Brown, Ohio EPA, DDAGW, SWDO

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