

Northwest District Office

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Bob Taft, Governor
Bruce Johnson, Lieutenant Governor
Joseph P. Koncelik, Director

Re: Seneca County
Sunny Farms Landfill
Ground Water

January 9, 2007

Mr. Michael Holmes
Regus Industries, LLC
2730 Transit Road
West Seneca, NY 14224

Dear Mr. Holmes:

The Ohio Environmental Protection Agency (Ohio EPA) has reviewed a document titled, Sunny Farms Landfill Groundwater Detection Monitoring Program Update of the Background Database, dated July 19, 2006 for the Sunny Farms Landfill. The report was received by Ohio EPA on July 21, 2006.

The Sunny Farms Landfill is located in Loudon Township, Seneca County, Ohio. The solid waste ID number is 74-00-02. Seven wells are in assessment monitoring. Sixteen wells are in detection monitoring. Based on Ohio EPA's evaluation, the facility is presently operating under the correct ground water monitoring phases, the well system is adequate for the detection monitoring program and the owner/operator should continue to monitor under the current program. The assessment monitoring network is presently not adequate. Ohio EPA reviewed the report dated July 19, 2006 in order to determine compliance with OAC Rule 3745-27-10.

COMMENTS

VIOLATIONS

1. OAC Rule 3745-27-10(C)(7)(e): The owner/operator continues to be in violation of OAC Rule 3745-27-10(C)(7)(e), requiring: **The statistical method shall account for data below the limit of detection with one or more statistical procedures that ensure protection of human health and the environment. Any practical quantitation limit (PQL) used in the statistical method shall be the lowest concentration level that can be reliably achieved within the specified limits of precision and accuracy during routine laboratory operating conditions that are available to the facility.**

According to the ground water detection monitoring plan (GWDMP) dated June 2005, page 29, **In the event all background data is reported below the laboratory PQL for an individual parameter, the nonparametric prediction limit is considered to be the highest historical PQL.**

According to the July 2006 data report, Appendix D, Test America laboratory sheet, "The ... (PQL) is the lowest concentration that the laboratory can reliably achieve..."

According to the July 2006 data report, Appendix D

Parameter	Nonparametric Intrawell Prediction Limit	Interwell Prediction Limit	PQL from July 2006 Sampling Event Appendix D
benzene	<2		1 ug/L
chloroethane	<10 ug/L		5 ug/L
1,1-dichloroethane	<5 ug/L		1 ug/L
antimony	<5 ug/L	<5 ug/l	1 ug/L
chromium	<10 ug/L	13 ug/l*	2 ug/L
cobalt	<100 ug/L	<100 ug/l	5 ug/L
selenium	<5 - <40 ug/L	<5 ug/l*	5 ug/L
silver	<5 ug/L	13 ug/l*	0.5 ug/L

The prediction limits in the above table are based on the highest PQLs used for each of the parameters. The laboratory has been able to achieve lower PQLs than those listed above in the "prediction limits" column. This is reflected in the fact that the laboratory personnel have listed lower PQLs (these are listed in the "PQL from July 2006 Sampling Event Appendix D" column). To enter into compliance with this rule the owner/operator needs to use a PQL that is the lowest concentration level that can be reliably achieved within the specified limits of precision and accuracy during routine laboratory operating conditions that are available to the facility (except for the parameters marked with the asterisk) The ground water detection monitoring plan needs to be revised to reflect this change.

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If you have any questions please contact Jack Leow, C.P.G., at the Ohio EPA, Northwest District Office, Division of Drinking and Ground Waters, 347 N. Dunbridge Rd., Bowling Green, Ohio 43402. Submit all reports/data to Mary Ann Miller, Ohio EPA, Northwest District Office, Division of Solid and Infectious Waste Management, 347 N. Dunbridge Rd., Bowling Green, Ohio 43402.

Sincerely,



Mary Ann Miller, R.S.
Environmental Specialist
Division of Solid and Infectious Waste Management

/lb

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~~NWDO File: Seneca County, Sunny Farms Landfill, Groundwater~~

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