



State of Ohio Environmental Protection Agency

Northwest District Office

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

Re: Huron County Landfill
Ground Water
Huron County, Ohio

August 21, 2008

Huron County Commissioners
180 Milan Ave.
Norwalk, Ohio 44857

Dear Commissioners:

The Ohio Environmental Protection Agency (Ohio EPA) reviewed the Revisions to the February 2008 Ground Water Quality Assessment Plan (AMP); Response to Ohio EPA's April 18, 2008 letter. The documents were received on May 19, 2008 and prepared by Malcolm Pirnie, Inc. Huron County Landfill is conducting detection monitoring, as well as assessment monitoring for well MW-19. The document contains a partial revision of the Ground Water Quality Assessment Monitoring Plan (AMP) dated February 2008. Pages 2-2, 2-3, 3-1, 3-4, 3-5, 4-4 and 6-1 of the plan were revised along with the boring logs and well construction diagrams. Ohio EPA reviewed the documents with respect to Ohio EPA's April 18, 2008 letter and the requirement of Ohio Administrative Code (OAC) Rule 3745-27-10.

COMMENTS

Evaluation of Owner or Operator's Response to Previously Cited Violations

1. **The owner/operator remains in violation of OAC Rule 3745-27-10(E)(6), requiring the owner/operator implement a ground water quality assessment plan that determines the rate, extent and concentration of the waste-derived constituents in the ground water. The owner/operator should revise the Ground Water Quality Assessment Monitoring Plan (AMP) as follows.**

The AMP should include the owner/operator's request to access the off-site property. The AMP should include a copy of the written statement from the off-site property owner, if a response is provided. If access is granted, a monitoring well should be installed hydrogeologically downgradient of monitoring well MW-19. This well should define the horizontal rate, extent and concentration of the ground water contamination.

The AMP may need additional revisions, if access off-site is denied. In this case, the owner/operator should determine if any seeps, springs, streams, or other surface waters can be incorporated into the AMP under OAC Rule 3745-27-10(B)(1). If so, the surface water must be representative of the ground water quality passing directly downgradient of waste and well MW-19. The AMP would need to be revised accordingly and include the methods for collecting and analyzing these samples.

More Information Needed to Determine Compliance

- 2. Compliance with OAC Rules 3745-27-10(C)(2)(c)(i) and (C)(2)(c)(ii), requiring the collection of ground water samples, cannot be determined at this time. For Ohio EPA to determine compliance, the owner/operator should revise the AMP to include the following information.**

The owner/operator states, "We have been using submersible pumps and low-flow purging/sampling techniques in all wells at the landfill" (May 16, 2008 letter, p. 3). The AMP states, "Some site monitoring wells will be evacuated (purged) with new polyethylene or PVC bailers, as described in Table 3-1" (AMP Section 3.2).

The owner/operator should revise the AMP to state what wells will be purged and sampled with bailers and state, where low-flow purging and sampling with pumps will be used. If the owner/operator intends to use low-flow methods, then Section 3.3.1 in the AMP should be revised to include the stabilization criteria for drawdown. In making these revisions, Sections 3, 3.2, 3.3, 3.3.1 and Table 3-1 need to be revised.

- 3. Compliance with OAC Rule 3745-27-10(C)(2)(d)(ii), requiring the calibration of field devices, cannot be determined at this time. For Ohio EPA to determine compliance, the owner/operator should revise the AMP to include the following information.**

It remains unclear what devices will be used to measure field parameters and how these devices will be calibrated. The owner/operator rents a Yellow Springs Instrument (YSI) Model 556 Multi Probe System and flow-through cell to measure dissolved oxygen (May 16, 2008 letter, p. 5). The owner/operator states, the dissolved oxygen portion of the probe will be calibrated daily (May 16, 2008 letter, p. 5). However, the AMP does not include this statement or the instructions to calibrate this instrument. The owner/operator should revise the AMP to include this information. Also, it is uncertain what field device will be used at which wells, because the AMP includes instructions on how to calibrate an Oakton pH/temperature/conductivity meter. The owner/operator should revise the AMP to clarify, what device is used at the wells that are bailed and, what device is used at the wells that are pumped. The owner/operator should also clarify what field parameters these devices are used to monitor and at which wells.

Statements

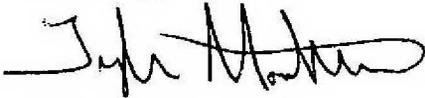
4. Comments 1, 2 and 3 in this letter regard the owner/operator's response to Comments 1, 2 and 5 in Ohio EPA's April 18, 2008 letter, respectively.
5. The owner/operator's response to Comment 3 in Ohio EPA's April 18, 2008 letter is adequate. Table 4-1 has been revised accordingly in the AMP (p. 4-4).
6. The owner/operator's response to Comment 4 in Ohio EPA's April 18, 2008 letter is adequate. Figure 2-1 has been revised accordingly in the AMP (p. 2-3).
7. The owner/operator's response to Comment 6 in Ohio EPA's April 18, 2008 letter is adequate. Section 6.1 has been revised accordingly in the AMP (p. 6-1).

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8. Monitoring well MW-2 has been reinstated to the ground water detection monitoring program (letter dated June 18, 2008). The AMP text, including Tables 1-1 and 1-2, can be revised accordingly.

If you have any questions please feel free to contact Pete Sokoloski at the Ohio EPA Northwest District Office (419-373-4100). Any written correspondence should be sent to the attention of Tyler Madeker, Division of Solid and Infectious Waste Management, Ohio EPA Northwest District Office, 347 N. Dunbridge Road, Bowling Green, Ohio 43402.

Sincerely,



Tyler Madeker S.I.T.
Division of Solid and Infectious Waste Management

/lb

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