



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 spring 2008 Ground Water Monitoring Report. The document was received on July 8, 2008. Huron County Landfill is conducting detection monitoring; as well as assessment monitoring for monitoring well MW-19. Ohio EPA reviewed the document for compliance with the Ohio Administrative Code (OAC) Rule 3745-27-10. The document contains the results from the first 2008 semiannual detection and annual assessment sampling events. The sampling events were conducted April 28-30, 2008 with resampling on May 28, 2008. Test America analyzed the ground water samples. Monitoring well MW-2 was reinstated to the detection monitoring program on June 18, 2008.

**COMMENTS**

**Violations**

1. The owner/operator is in violation of OAC Rule 3745-27-10(C)(10)(g), requiring the sampling event report include the practical quantitation limits (PQL) for the constituents analyzed. The Spring 2008 Ground Water Monitoring Report does not include this information. This information should be included in each sampling event report.

**More Information Needed to Determine Compliance**

2. Compliance with OAC Rule 3745-27-10(C)(7)(e), requiring the PQL, used in the statistical method, be the lowest concentration level that can be reliably achieved within the specified limits of precision and accuracy, cannot be determined at this time. For Ohio EPA to determine compliance, Test America should submit the PQLs that were used to analyze the Spring 2008 ground water samples from Huron County Landfill.

3. **Compliance with OAC Rule 3745-27-10(C)(1), requiring consistent sampling, analysis, and statistical methods, designed to ensure monitoring results that provide an accurate representation of ground water quality at the background and downgradient wells, cannot be determined at this time. The ground water samples were not preserved in accordance with Huron County Landfill's ground water monitoring plans. The samples were not received at the laboratory at 4 degrees Celsius (°C). For Ohio EPA to determine compliance, Test America must verify how the high temperature of the samples affected the results.**

The ground water temperature ranged from 9-15 °C (48-59 °F) during purging and sampling. The ground water samples should have been cooled to 4 °C (39.2 °F) in accordance with the ground water monitoring plans (Table 4-1 in both the detection and assessment monitoring plans). However, the shipping cooler temperature was much higher than 4 °C, when received by Test America on May 1, 2008.

The table contains information from the Analytical Report, included in the Spring 2008 Ground Water Monitoring Report.

Date Received at Laboratory	Shipping Cooler I.D.	Shipping Cooler Uncorrected Temperature (°C)	Shipping Cooler Corrected Temperature (°C)	Shipping Cooler Corrected Temperature (°F)
May 1, 2008	1	18.6	18.8	65.8
	2	10.2	10.4	50.7
	3	20.6	20.8	69.4
	4	12.6	12.8	55.0
	5	11.4	11.6	52.9
	6	16.0	16.2	61.2
	7	14.8	15.0	59.0
	8	12.4	12.6	54.7
May 28, 2008		5.4	5.6	42.1

The Analytical Report states, "Most environmental analytical testing methods require samples to be shipped above freezing, with temperatures not to exceed 6 degrees C. If sample temperatures are outside of this temperature range at the time of sample receipt, results may be impacted" (Spring 2008 Ground Water Monitoring Report, Appendix B, p. 1).

To determine compliance, Test America should discuss why the cooler temperatures were corrected and how the high temperature of the samples affected the results.

4. **Compliance with OAC Rules 3745-27-10(B)(1) cannot be determined at this time. Authorization is needed from the director to sample seeps, springs, streams, or include other surface water monitoring, as part of the ground water monitoring system in areas, where it may not be practical to place a monitoring well. For Ohio EPA to determine compliance, the owner/operator must state the purpose of sampling 'seep-1' and 'seep-2' during the 2008 sampling event.**

If the owner/operator intends to include the seeps in the detection or assessment monitoring programs, in accordance with this rule, the owner/operator will need to request and receive the director's approval, and revise the monitoring plan to include the techniques, procedures and equipment used to sample and analyze these locations.

5. **Compliance with OAC Rules 3745-27-10(C)(1), requiring consistent sampling, analysis, and statistical methods, designed to ensure monitoring results that provide an accurate representation of ground water quality at the background and downgradient wells; OAC Rule 3745-27-10(C)(6)(e), requiring the director's approval to use another statistical method; OAC Rule 3745-27-10(D)(7)(b), requiring the notification of wells and parameters that have shown a statistically significant increase over background levels; and OAC Rule 3745-27-10(D)(7)(c)(i), requiring the use of the 1 of M resampling method to demonstrate that the statistically significant increase over background was a false positive, cannot be determined at this time. For Ohio EPA to determine compliance, the owner/operator should provide the following information.**

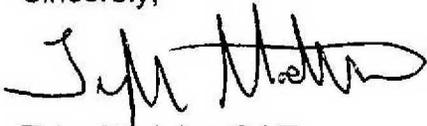
Table C2 in the sampling event report states, "*Trigger for possible sampling or analytical problems: For both results greater than 5 times the DL [i.e., detection limit]:  $\pm 25\%$ ; For either result equal to or less than 5 times the DL:  $\pm DL$* " (Spring 2008 Ground Water Monitoring Report, Appendix C2).

The owner/operator should discuss how the criteria, stated above, were determined. The owner/operator should explain how statistically significant increases are reported consistently using these criteria. Also, the owner/operator must show they had approval from the director or his authorized representative to use this method during the Spring 2008 sampling event, since it constitutes another statistical method under OAC Rule 3745-27-10(C)(6)(e).

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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

/csl

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