



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

March 13, 2007

Huron County Commissioners
180 Milan Avenue
Norwalk, Ohio 44857

Dear Commissioners:

The Ohio Environmental Protection Agency (Ohio EPA) completed a review of the October 23, 2006, response to Ohio EPA Comments and the revised Ground Water Quality Assessment Plan for the Huron County Landfill. Ohio EPA received the report on February 12, 2007. Following are Ohio EPA comments regarding this report.

The owner/operator is currently required to perform ground water detection monitoring (and assessment monitoring activities for MW-2, MW-19 and MW-21) at the facility. Ohio EPA has reviewed two submittals: the October 23, 2006, letter (received October 26, 2006) from Malcolm Pirnie, Inc. and the revised Ground Water Quality Assessment Plan (dated January 2007, and received February 12, 2007) for the facility. Both of these submittals document responses to the September 28, 2006, letter from Ohio EPA (which regarded the April 2006 sampling event and previous comment letters from Ohio EPA). These submittals were reviewed to determine compliance with OAC Rule 3745-27-10.

COMMENTS

Violations

1. OAC Rule 3745-27-10(E)(6)(a): The owner/operator continues in violation of OAC Rule 3745-27-10(E)(6)(a) as described below.

As initially stated in the September 24, 2004 letter from Ohio EPA, "**OAC Rule 3745-27-10(E)(6)(a) requires that the report for the determination of rate, extent and concentration include the *rate and extent of migration of the waste-derived constituents in the ground water.***"

The September 24, 2004, letter cited the owner/operator in violation of this rule because the extent of ground water contamination north of MW-19 had not been adequately defined.

Since that time, discussions have continued regarding the proper placement of monitoring wells to allow a determination of the extent of ground water contamination north of MW-19. Monitoring well AW-19B (installed in February 2004) might have been an adequate well for this purpose. However, the owner/operator abandoned this well in August 2006, as the owner/operator suspected it was drilled through waste. This suspicion was apparently based on observations that the water was very turbid and the well produced a large amount of landfill gas. However, these observations alone do not prove that AW-19B was installed through waste. In fact, the boring log for AW-19B does not indicate that any waste was observed in the boring. High turbidity of the ground water is a common occurrence in new monitoring wells, regardless of whether or not the well is installed through waste. Further, it is a common occurrence for wells impacted by landfill leachate to emit landfill gas. Given this, it is quite possible that AW-19B was not installed through waste.

To regain compliance with the requirements of OAC Rule 3745-27-10(E)(6)(a), the owner/operator needs to adequately define the extent of the ground water contamination north of MW-19 (for the significant zone of saturation screened by MW-19). To achieve this, the owner/operator needs to install at least one well north of MW-19. One possible location for such a new well would be near North 3650/East 1200 (approximately 275 feet north-northeast of MW-19). Once the well(s) was/were installed and developed, ground water samples would need to be collected as part of defining the extent of ground water contamination north of MW-19.

Owner/Operator's Response to Previously Cited Violations

2. As stated in the June 15, 2004 letter from Ohio EPA (regarding the Ground Water Quality Assessment Plan), the owner/operator was cited in violation of OAC Rule 3745-27-10(E)(4)(b)(ii) as the Ground Water Quality Assessment Plan (GWQAP) lacked required documentation. The revised GWQAP (January 2007) includes this required documentation. Therefore, the owner/operator has regained compliance with OAC Rule 3745-27-10(E)(4)(b)(ii) for this issue.

Statements

3. The September 24, 2004 Letter from Ohio EPA (RE: First Determination for MW-19) contained five (5) comments.

Comment No. 1 of the September 24, 2004 letter from Ohio EPA has not yet been addressed (see Comment No. 1 above). Comment No. 2 of the September 24, 2004 letter from Ohio EPA has not yet been addressed (as documented under separate cover from Ohio EPA. Comment No. 3 of the September 24, 2004 letter was adequately addressed by the submittal.

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Comments No. 4 and 5 of the September 24, 2004, letter did not require a response.

4. With the submittal of the October 23, 2006, letter from Malcolm Pirnie, Inc. and the revised Ground Water Quality Assessment Plan (dated January 2007), numerous outstanding comments from Ohio EPA have been addressed. Many of these comments were either addressed by these recent submittals, were addressed previously, or did not require a response. All issues of the following letters from Ohio EPA have now been adequately addressed.

- June 15, 2004 Letter (RE: GWQAP);
- July 28, 2004 Letter;
- September 3, 2004 Letter (RE: April-May 2004 sampling event);
- November 29, 2004 Letter (RE: Response to Comments);
- February 11, 2005 Letter;
- March 2, 2005 Letter;
- August 11, 2005 Letter (RE: March 2005 sampling event);
- November 23, 2005 Letter;
- March 22, 2006 Letter;
- July 5, 2006 Letter (RE: GWDMP);
- July 5, 2006 Letter (RE: GWQAP);
- September 28, 2006 Letter.

If you have any questions please feel free to contact Ken Brock at Ohio EPA Northwest District Office (419)373-3143. Any written correspondence should be sent to the attention of Mary Ann Miller, Division of Solid and Infectious Waste Management, Ohio EPA Northwest District Office, 347 N. Dunbridge Road, Bowling Green, Ohio 43402.

Sincerely,



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

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