



State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Road
Bowling Green, OH 43402-9398

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

Re: Hoffman Road Landfill, Lucas County
Ground Water

April 15, 2008

Mr. Edward Irelan, Manager of Operations
Hoffman Road Landfill
3962 Hoffman Road
Toledo, Ohio 43611

Dear Mr. Irelan:

On March 17, 2008, the Ohio Environmental Protection Agency (Ohio EPA), Division of Solid and Infectious Waste Management (DSIWM), Northwest District Office (NWDO) received a response to Ohio EPA's January 17, 2008, comment letter regarding groundwater monitoring at the City of Toledo Hoffman Road Landfill in Lucas County. The response, dated March 13, 2008, was submitted by Hull & Associates, Inc., on behalf of the City of Toledo. Ohio EPA has reviewed the response for compliance with the ground water monitoring requirements of the Ohio Administrative Code (OAC) 3745-27-10. Ohio EPA's comments are below.

COMMENTS

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

The City of Toledo's revised statistical analysis of ammonia data for monitoring wells MW-16 and MW-11 meets the requirements of OAC Rule 3745-27-10(C)(7)(a). The violation cited in comment number 1 of Ohio EPA's January 17, 2008, notification has been adequately addressed.

Ohio EPA's January 17, 2008, correspondence notified the City of Toledo of a violation of OAC Rule 3745-27-10(C)(7)(a), which requires the statistical method used to evaluate ground water monitoring data to be appropriate for the distribution of chemical parameters or waste-derived constituents. To meet the requirement, Ohio EPA informed the City of Toledo that they must revise the statistical analysis of ammonia data for monitoring wells MW-16 and MW-11 using procedures appropriate for the data distribution.

The City of Toledo's March 13, 2008 response includes revised statistical analysis of ammonia data for monitoring wells MW-16 and MW-11. The revised statistical analysis uses procedures for a normal data distribution and confirms statistically significant increases in ammonia concentrations at monitoring wells MW-16 and MW-11.

Mr. Edward Irelan, Manager of Operations

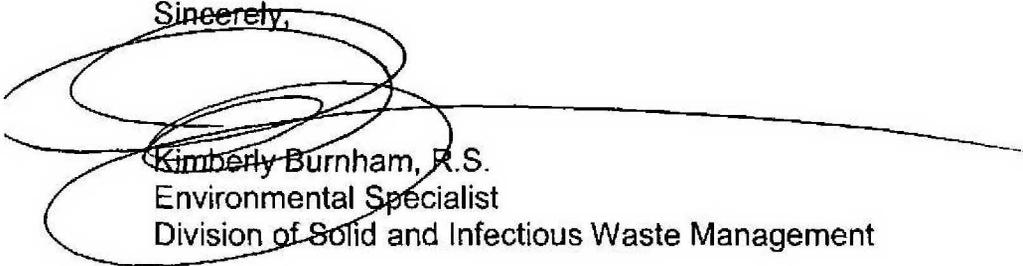
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The response also includes an alternate source demonstration for monitoring wells MW-16 and MW-11 and a request to update background for ammonia at monitoring wells MW-16 and MW-11, which Ohio EPA will review and respond to in separate correspondence.

If you have any questions please contact Mike Beal at the Ohio EPA Northwest District Office at 419-373-3093. Any written correspondence should be sent to the attention of Kimberly Burnham, Division of Solid and Infectious Waste Management, Ohio EPA Northwest District Office, 347 N. Dunbridge Road, Bowling Green, Ohio 43402.

Sincerely,



Kimberly Burnham, R.S.
Environmental Specialist
Division of Solid and Infectious Waste Management

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pc: Jodi Vaughan, Toledo-Lucas County Health Department
Karen Okonta, Hull and Associates, Inc.
Mike Beal, DDAGW, NWDO
Jack Leow, DDAGW, NWDO

File: Lucas County, Hoffman Road, Landfill, Ground Water
id: 5-7576