



State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Rd.
Bowling Green, OH 43402-9398

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www.epa.ohio.gov

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

Re: Unitcast Landfill, Lucas County
Ground Water

February 17, 2010

Mr. Samir Moawad
Managing Partner, Moawad LTD.
P. O. Box 8339
Toledo, Ohio 43605

Dear Mr. Moawad:

The Ohio Environmental Protection Agency (Ohio EPA), Northwest District Office (NWDO), received Report of Groundwater Quality for the November 9, 2009, Sampling Event dated January 22, 2010, (report) for the Unitcast Closed Residual Waste Landfill (facility).

Ohio EPA reviewed the requirements of Ohio Administrative Code (OAC) 3745-30, Findings and Orders dated October 26, 1992, and May 2, 2007, and an approved Closure and Post Closure Plan (approved April 26, 1996) and Closure and Post Closure Plan conditions dated April 26, 1996, for the Unitcast Closed Residual Waste Landfill. The Ohio EPA has reviewed the report in order to determine whether or not it complies with OAC Rule 3745-30-08, Findings and Orders dated October 26, 1992, and May 2, 2007, and an approved Closure and Post Closure Plan (approved April 26, 1996) and Closure and Post Closure Plan conditions dated April 26, 1996.

The Groundwater Sampling and Analysis Plan for the Unitcast Residual Waste Landfill, dated April 1993, was revised May 2005.

The radiological parameter results were submitted to address violation number 3 contained in Ohio EPA's letter dated October 27, 2009.

COMMENTS

Violations

1. The owner/operator is in violation of OAC Rule 3745-30-08(A) requiring the owner/operator to use the methods documented in the ground water monitoring program plan (GWMPP); and Order 1 b requiring the owner/operator to comply with the Groundwater Monitoring Plan and continue to sample the monitoring wells.

Lucas Co Unitcast GW

In order to prevent violations for future sampling events, the owner/operator needs to analyze volatile organic compound (VOC) samples for all of the parameters in Table 1 and submit the results to the Ohio EPA. This violation was cited in the Ohio EPA letter dated October 27, 2009 and no response to this comment has been received by the Ohio EPA.

2-chloroethyl vinyl ether is included in the list of parameters to be analyzed for the quarterly sampling events on Table 1, page 2-5 in the GWMPP. The owner/operator collected VOC samples, but did not submit the results for 2-chloroethyl vinyl ether.

More Information Needed To Determine Compliance

2. Compliance with OAC Rule 3745-30-08(C)(1), requiring the ground water monitoring program shall include consistent sampling and analysis procedures that are protective of human health and safety and the environment and that are designed to ensure monitoring results that provide an accurate representation of ground water quality at the background and downgradient wells. Unless the owner/operator can explain how the collection of turbid samples from the wells provides results which are representative of the ground water quality of the site, the owner/operator needs to insure that low turbidity samples are collected from the wells at the site. The wells need further development in order to lower the turbidity. An explanation is also needed for the difference between field and laboratory turbidity results. This comment was included in the Ohio EPA letter dated October 27, 2009 and no response to the comment has been received by Ohio EPA.

Turbidity continues to be a problem in the wells at the landfill as seen in the table below.

Well Number	Laboratory Turbidity (NTU)	Field Turbidity (NTU)
MW3R	69.8	112

Excessive turbidity can adversely impact parameter concentrations producing results which are not representative of the ground water quality at the site. Ideally, turbidity should be less than 10 NTU. It does not appear that the well have been developed sufficiently.

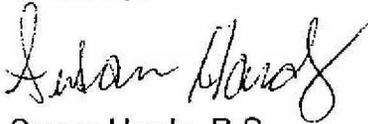
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STATEMENTS

3. The data for well MW3R (downgradient well) shows increasing trends for arsenic, barium, cadmium, calcium, COD, chromium, iron, lead, magnesium, and manganese. The data for MW1R (upgradient well) and MW2 do not show the increasing trends for these parameters.

If you have any questions, please contact Jack Leow at the Ohio EPA Northwest District Office at (419) 352-8461. Any written correspondence should be sent to the attention of Susan Hardy, Division of Solid and Infectious Waste Management, Ohio EPA Northwest District Office, 347 N. Dunbridge Road, Bowling Green, Ohio 43402.

Sincerely,



Susan Hardy, R.S.
Environmental Specialist
Division of Solid and Infectious Waste Management

//lr

pc: Karen Okonta, Hull & Associates, Inc.
Michelle Hughes-Tucker, City of Toledo, Division of Environmental Services
Timothy Murphy, City of Toledo, Division of Environmental Services
Jodi Vaughan, Toledo-Lucas County Health Department
~~DSIWM-NWDO File: Lucas County, Unitcast Landfill, Ground Water. ->~~

ec: Mike Reiser, DSIWM, NWDO
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