



State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Road
Bowling Green, OH 43402-9398

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www.epa.state.oh.us

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

Re: Unitcast Landfill, Lucas County
Ground Water

October 27, 2009

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 Preliminary Report of Groundwater Quality for the August 5, 2009, Sampling Event Completed for the Unitcast Residual Waste Landfill on September 21, 2009, and the Addendum to the September 17, 2009, Report of Groundwater Quality on October 2, 2009, (reports) for the Unitcast Closed Residual Waste Landfill.

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 reports in order to determine whether or not they comply 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.

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. 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.**

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.

2. **The owner/operator is in violation of OAC Rule 3745-30-08(A) (see comment 1 above for the rule reference). In order to prevent violations for future sampling events, the owner/operator needs to include the following information on the Field Data sheets: ...screened interval...**

According to the GWMPP, pages 2-14 to 2-15, the **screened interval** needs to be included on the field data sheets. The Field Data sheets do not include the **screened interval**.

3. **The owner/operator is violation of OAC Rule 3745-30-08(C)(8), requiring all ground water analysis results, statistical analysis results, and ground water elevation data generated in accordance with paragraphs (C), (D), (E), and (F) of this rule shall be submitted to Ohio EPA not later than seventy-five days after sampling the well. The report does not contain results for gross alpha or gross beta. The owner/operator should sample for and submit the results for gross alpha and gross beta in future sampling events.**

More Information Needed To Determine Compliance

4. **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.**

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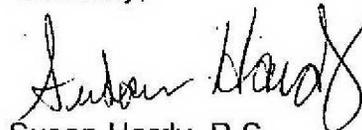
Turbidity continues to be a problem in the wells at the landfill as seen in the table below.

Well Number	Laboratory Turbidity (NTU)	Field Turbidity (NTU)
MW1R	81.3, 111	44, 44
MW3R	91	186

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 wells have been developed sufficiently.

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
DSIWM-NWDO File: Lucas County, Unitcast Landfill, Ground Water

ec: Mike Reiser, DSIWM, NWDO
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