



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 Korleski, Director

Re: Residual Waste Landfill
Groundwater

August 24, 2007

Mr. Brad Hemminger, Project Manager
United States Gypsum Company
Gypsum, Ohio 43433

Dear Mr. Hemminger:

On July 6, 2007, the Ohio Environmental Protection Agency (Ohio EPA), Northwest District Office (NWDO), received a document titled: "*Submittal of Sampling and Analysis Results for Assessment Sampling Event for Monitoring Wells at the U.S. Gypsum Company Landfill*," dated July 6, 2007, for the United States Gypsum Company's (US Gypsum) Residual Waste Landfill (Facility) in Ottawa County. The submittal was reviewed to determine compliance with Ohio Administrative Code (OAC) Chapter 3745-30, an approved Closure Plan, and the Director's Findings and Orders dated October 12, 1994. Below are Ohio EPA's comments regarding the review.

COMMENTS

VIOLATIONS

1. **The owner/operator is in violation of OAC Rule 3745-30-08(E)(4), which requires the assessment wells to be analyzed semiannually for Appendix III and parameters determined to be released. The owner/operator must sample wells MW7 and MW8 as required by the rule.**

According to the Groundwater Quality Assessment Plan dated April 2007, page 19, "Nickel was reported just slightly above the PQL in groundwater samples collected from MW-7 and MW-8 at 0.0196 mg/L and 0.026 mg/L. Statistical significances have not been identified for indicator parameters analyzed in these monitoring wells." According to Tables 4, 6 and 9 the background concentration for nickel is <0.01 mg/L.

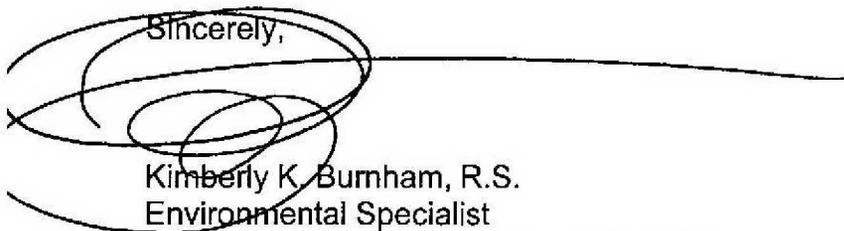
The concentration of nickel in wells MW7 (19.6 ug/L) and MW8 (26.0 ug/L) was at least double the concentration of the background wells (<10 ug/L). The background wells were reported as being less than the detection limit for nickel. Nickel was determined to be above background in wells MW7 and MW8. Therefore, wells MW7 and MW8 should be in assessment. Wells determined to

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be in assessment are required to be sampled semiannually according to OAC Rule 3745-30-08(E)(4). In order to return to compliance, the owner/operator must sample wells MW7 and MW8 as required by OAC Rule 3745-30-08(E)(4) as soon as possible and continue to sample them on a semiannual basis.

If you have any questions, please contact Jack Leow, C.P.G., at the Ohio EPA Northwest District Office at (419) 352-8461. 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 K. Burnham, R.S.
Environmental Specialist
Division of Solid and Infectious Waste Management

/lb

pc: Jack Leow, DDAGW, NWDO
~~File: Ottawa County, US Gypsum, groundwater~~

ec: Habib Kaake

id: 5-7043