



State of Ohio Environmental Protection Agency

Northwest District Office

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

Re: Residual Waste Landfill
Groundwater

January 5, 2009

Mr. Andy Cvitkovich, Engineering Manager
United States Gypsum Company
Gypsum, Ohio 43433

Dear Mr. Cvitkovich:

On November 17, 2008, the Ohio Environmental Protection Agency (Ohio EPA), Northwest District Office (NWDO), received a report documenting the Sampling and Analysis Results for a Supplemental Sampling Event for Monitoring Wells at the United States Gypsum Company (US Gypsum) Residual Waste Landfill (Facility) in Ottawa County. The report, dated November 17, 2008, 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. U.S. Gypsum 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 semiannually as required by the rule.**

Since the beginning of the assessment monitoring program at the facility, wells MW7 and MW8&8R have only been sampled for the assessment parameters in October 2006 and April 2008. The November 17, 2008 data submittal once again does not contain any sampling results for MW7 and MW8R. This is the third semiannual sampling event that samples have not been collected for the assessment parameters for these wells. In order to regain compliance with OAC Rule 3745-30-08(E)(4), the owner/operator must sample wells MW7 and 8R for the appendix III parameters and those parameters determined to be released, as described in detail in Ohio EPA's March 11, 2008 letter to the owner/operator.

More Information Needed to Determine Compliance

- 2. Compliance with OAC Rule 3745-30-08(C)(1), which requires consistent sampling procedures designed to ensure monitoring results that provide an accurate representation of ground water quality, cannot be determined at this time. U.S. Gypsum needs to do one of the following:**

Revise the Ground Water Detection Monitoring Sampling and Analysis Plan to document the new field parameter stabilization criteria as noted below;

OR

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Demonstrate to Ohio EPA how the current field parameter stabilization criteria in the Ground Water Detection Monitoring Sampling and Analysis Plan meet the requirements of OAC Rule 3745-27-08(C)(1).

Page 7 of U.S. Gypsum's Ground Water Detection Monitoring Plan (Revised November 2005) states, "Prior to sample collection, all monitor wells will be purged to remove any stagnant water in the casing and to ensure that a representative groundwater sample is being collected. SOP No. F3008 included in Appendix A outlines the proper purging procedures and documentation utilized

by Hull." Hull & Associates (Hull) SOP F3008 states in part, "The temperature, pH, and conductivity will be measured initially, as well as after each well volume is purged. The last two values obtained must be within 10 percent of one another."

Based on review of current technical literature, Ohio EPA now considers the criteria for stabilization of these field parameters to be ± 0.1 Standard Units (S.U.) for pH, $\pm 3\%$ for conductivity, and ± 0.5 ° C for temperature. Also, a parameter should be considered stable when at least three consecutive readings have stabilized.

According to the Groundwater Monitoring Well Field Data Sheets for wells MW1, MW4, MW11, and MW12, temperature did not stabilize over the last three purge volumes. The difference between the fifth reading and the sixth/final reading was more than 0.5°C.

3. **Compliance with OAC Rule 3745-30-08(C)(1), which requires consistent analysis procedures designed to ensure monitoring results that provide an accurate representation of ground water quality, cannot be determined at this time. The owner/operator must explain why the laboratory diluted 15 of 27 parameters analyzed from 2 to 100 times.**

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 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
William Petruzzi, Hull & Associates, Inc.
~~File: Ottawa County, US-Gypsum, groundwater~~

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