



State of Ohio Environmental Protection Agency

Northwest District Office

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

TELE: (419) 352-8461 FAX: (419) 352-8468
www.epa.state.oh.us

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

Re: Port Clinton Landfill
Groundwater

April 8, 2009

Mr. John Logsdon
Port Clinton Landfill, Inc.
530 North Camp Road
Port Clinton, Ohio 43452

Dear Mr. Logsdon:

On February 20, 2009, the Ohio Environmental Protection Agency (Ohio EPA), Division of Solid and Infectious Waste Management (DSIWM), Northwest District Office (NWDO) received the Ground Water Monitoring Report for the December 2008 Semi-annual Sampling Event, dated February 19, 2009, for the Port Clinton Landfill. Ohio EPA reviewed the report to determine compliance with Ohio Administrative Code (OAC) Rule 3745-27-10. Below are Ohio EPA's comments regarding the review.

COMMENTS

Violations

- 1. The owner/operator is in violation of OAC Rule 3745-27-10(E)(7) regarding the timeline for submittal of the first determination of rate, extent and concentration. The report for the first determination of rate, extent and concentration for MW-23 must be submitted to Ohio EPA as soon as possible.**

OAC Rule 3745-27-10(E)(7) requires that the owner/operator make and submit a determination in accordance with OAC Rule 3745-27-10(E)(6) [the first determination of rate, extent and concentration] within the time specified in the ground water quality assessment plan (GWQAP).

The owner/operator was previously permitted to extend the deadline for this first determination of rate, extent and concentration (for well MW-23) and revised the GWQAP accordingly. However, the revised GWQAP documents that this report would be completed no later than the end of August 2008. This deadline has passed and a first determination of rate, extent and concentration for MW-23 has not been submitted to Ohio EPA.

Mr. John Logsdon
April 8, 2009
Page 2

Statements

2. **The owner/operator has until July 8, 2009, to either receive approval of a demonstration pursuant to OAC Rule 3745-27-10(D)(7)(c)(ii) for the statistically significant sodium increase at MW-33 or implement assessment monitoring for MW-33.**

During the December 10-12, 2008, semiannual sampling event, a statistically significant increase was noted for sodium at MW-33.

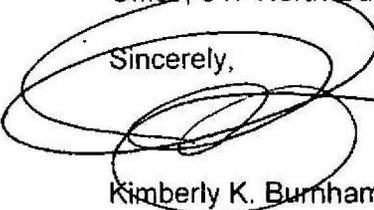
The submittal states that a demonstration in accordance with OAC 3745-27-10 (D)(7)(c)(ii) for this statistically significant increase will be submitted to Ohio EPA under separate cover.

OAC Rule 3745-27-10(D)(7)(c)(ii) states "... if the owner or operator does not obtain approval to continue detection monitoring within two hundred and ten days from initial sampling, the owner or operator shall comply with the provisions of paragraph (E) of this rule."

Therefore, if the owner/operator either does not seek approval to continue detection monitoring for this statistically significant increase or does not receive approval from the Director to continue detection monitoring at MW-33 by July 8, 2009, (210 days after December 10, 2008, initiation of sampling event) then the owner/operator will be required to implement a ground water quality assessment monitoring program for MW-33 by July 8, 2009.

If you have any questions, please contact Ken Brock at the Ohio EPA Northwest District Office at (419) 373-3143. 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 North Dunbridge Road, Bowling Green, Ohio 43402.

Sincerely,



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

/cs

pc: Jim Adams, Republic Services, Inc.
Joe Montello, Republic Services, Inc.
Dave Vossmer, Republic Services, Inc.
Matt Barnett, Civil & Environmental Consultants, Inc.
Ken Brock, DDAGW, NWDO
DSIWM, NWDO File – Ottawa County; BFI-Ottawa County Landfill, Groundwater

ec: JL, Habib, Mike Reiser
id: 5-8351