



State of Ohio Environmental Protection Agency

**Northwest District Office**

347 North Dunbridge Road  
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: Henry County Landfill, Henry County  
Ground Water

August 24, 2007

Henry County Commissioners  
1853 Oakwood Avenue  
Napoleon, Ohio 43545

Dear Commissioners:

The Ohio Environmental Protection Agency (Ohio EPA), Northwest District Office (NWDO), Division of Solid and Infectious Waste Management (DSIWM) has reviewed the July 26, 2007 letter (received July 27, 2007) from The Mannik & Smith Group, Inc. which documents the quarterly hydraulic monitoring report for the second quarter of 2007 and documents a semi-annual corrective measures activity report (first half 2007) for the Henry County Landfill (Facility). The letter was reviewed to determine compliance with Ohio Administrative Code (OAC) Rule 3745-27-10. Below are Ohio EPA's comments regarding the review.

**COMMENTS**

**Violations**

1. **Approved Corrective Measures Plan: The owner/operator is in violation of the approved corrective measures plan as the maximum pumping levels in the dewatering wells (DW-1, DW-2 and DW-3) are not being maintained. The owner/operator must increase pumping of the dewatering wells to lower the water levels to or below required maximum pumping levels.**

Table 4.0 of the Corrective Measures Plan (CMP) specifies the maximum pump-on and pump-off levels for each of the three dewatering wells. During the last three quarterly hydraulic monitoring events (November 2006, and March and May 2007), the maximum pump-on levels have been exceeded at all three of the dewatering wells. These levels have been exceeding the maximum allowable water levels by approximately three to five feet and have been above the top of the manhole at DW-3 during the March and May 2007 monitoring events.

The owner/operator was previously cited in violation of the approved corrective measures plan for this same occurrence (March 23, 2005 citation). As previously stated in the March 23, 2005 letter from Ohio EPA, **"Ohio EPA understands that these 'maximum pump on' levels at the dewatering wells may be briefly exceeded during extreme events (such as flooding events), because flow into the barrier trench might briefly exceed the capacity of the dewatering pumps. However, the owner/operator should be aware that these 'maximum pump on levels' will be required to be maintained on a regular basis."**

These maximum allowable pumping levels were exceeded slightly at times during the spring and summer of 2006 as well. However, these exceedances were attributed to the significant precipitation that fell during that period. On the contrary, the significant exceedances of the maximum allowable pumping levels for the November 2006, and March and May 2007 events have occurred during a relatively dry period.

### Statements

2. **If it is determined that the corrective measure is not being maintained and no longer functions as an effective hydraulic control, the owner/operator will need to reevaluate the corrective measure in accordance with the CMP.**

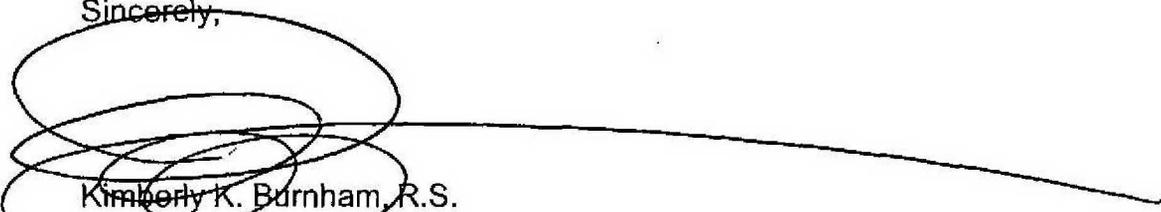
Regarding the measured liquid levels in the corrective measures area and the water and leachate withdrawal records for the barrier wall and the perimeter leachate collection trench, the submittal states **"...These data indicate that Henry County continues to take an aggressive approach to lowering groundwater elevations and controlling the extent of impacted groundwater at the facility. This aggressive approach has effectively lowered groundwater elevations near the cutoff wall and dewatering system..."**.

While this has been true in the past, recent measurements of the ground water levels in the vicinity of the cutoff wall and dewatering system (corrective measure) indicate that the ground water levels are rising and have returned to levels not seen since before the installation of the corrective measure.

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If you have any questions please feel free to 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 N. Dunbridge Road, Bowling Green, Ohio 43402.

Sincerely,



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

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pc: Mike Imbrock, Henry County Landfill  
Tom Covrett, The Mannick & Smith Group, Inc.  
Ken Brock, Ohio EPA, DDAGW, NWDO  
~~File: Henry County, Henry County Landfill, Ground Water~~

ec: Jack Leow  
Andy Drumm

i.d.: 5-7143