



State of Ohio Environmental Protection Agency

Northwest District Office

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Bowling Green, OH 43402-9398

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

Re: Richland County Landfill
Ground Water

May 3, 2010

Mr. Ken Bender
Richland County Regional Solid Waste Management Authority
1125 National Parkway
Mansfield, OH 44906

Mr. Jim DeSanto
City of Mansfield
30 North Diamond Street
Mansfield, Ohio 44902

Dear Mr. Ken Bender and Mr. DeSanto:

The Richland County Regional Solid Waste Management Authority (RCRSWMA) operates, and the City of Mansfield owns, Richland County Landfill, which is a closed municipal solid waste sanitary landfill facility located on the north side of Carnes Road. The RCRSWMA has implemented a ground water corrective action monitoring program at the facility. The RCRSWMA's ground water corrective measures program involves ground water monitoring performed in accordance with the RCRSWMA's Integrated Ground Water Monitoring Plan (IGWMP). For non-elevated ground water constituents, the IGWMP requires detection monitoring. For elevated ground water constituents, the IGWMP requires both assessment monitoring (the determination of rate and extent of migration and concentration of waste-derived constituents in ground water) and compliance monitoring (determination of whether additional corrective measures are necessary). The Ohio Environmental Protection Agency (Ohio EPA) has reviewed the "*Semi-Annual Detection, Assessment and Corrective Measures Report December, 2009 Sampling Event*" (received on February 19, 2010) for Richland County Landfill for compliance with ground water monitoring requirements of Ohio Administrative Code Rule (OAC) 3745-27-10.

The following are Ohio EPA's findings from the review.

COMMENTS

Violations

1. **The owner/operator is in violation of OAC Rule 3745-27-10(D)(7)(b) requiring that the owner or operator submit a written notification to Ohio EPA of a statistically significant increase over background not later than seventy-five days after withdrawing a sample from the well, that upon analysis demonstrates a statistically significant change. The Ohio EPA has found a statistically significant change for chloride in well A1SZS during the December, 2009 sampling event that was reported by the owner/operator. The owner/operator needs to notify the Ohio EPA of all statistically significant changes within 75 days of sampling in all future sampling events.**

Ohio EPA has noted that both the mean and CUSUM for chloride in well A1SZS have exceeded the upper control limit from the previous sampling event in June, 2009. The result from this sampling event (13.3 mg/l) in December, 2009 is slightly less than the previous detection (13.9 mg/l) from the June, 2009 event, but the increasing trend above the control limit remains intact.



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More Information Needed to Determine Compliance

2. **Action levels for chloride in MW-2A were in excess of the limit of 500 mg/l. Ohio EPA requests a timetable and/or workplan for additional assessment work to be completed to address this issue, including enhanced leachate extraction and removal.**

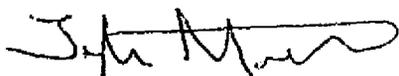
The corrective measures plan, as discussed in Section 7.2, has identified specific action levels for sodium (200 mg/l) and chloride (500 mg/l) concentrations in monitor well MW-2A. The December, 2009 sample result for chloride in MW-2A was 635 mg/l, and the results have been above the action level consistently since the December, 2004 sampling event.

Statements

3. **The owner/operator has until July 2, 2010, (135 days from the date of submittal of the report, February 17, 2010) to demonstrate that a source other than the sanitary landfill facility caused the contamination at well A1S2S or that the statistically significant increase over background resulted from error in the sampling, analysis, statistical evaluation or natural variation in ground water quality. A report documenting this demonstration needs to be submitted to and approved by the director or his authorized representative. If the owner or operator does not obtain approval to continue detection monitoring within 210 days from initial sampling, the owner or operator needs to comply with the provisions of OAC Rule 3745-27-10(E).**

If you have any questions please feel free to contact Dale Mc Lane at the Ohio EPA Northwest District Office, (419)-373-3099. Any written correspondence should be sent to the attention of Tyler Madeker, Division of Solid and Infectious Waste Management, Ohio EPA Northwest District Office, 347 N. Dunbridge Road, Bowling Green, Ohio 43402.

Sincerely,



Tyler Madeker, R.S.
Environmental Specialist
Division of Solid and Infectious Waste Management

/lb

pc: Ms. Andrea Barnes, Richland County Health Department
Mr. Tom Anderson, EM&C
Mr. Dale Mc Lane, DDAGW-NWDO
Mr. Barry Chapman, DSIWM-CO
~~File: Richland County, Richland County Landfill, Ground Water~~

ec: Mike Reiser, DSIWM-NWDO
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