



**Environmental
Protection Agency**

ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Kordeski, Director

54626

June 28, 2010

Mr. Bruce Reye
City of Urbana
205 S. Main Street
Urbana, Ohio 43078

RE: Urbana Closed Landfill, October 2009 Semiannual Ground Water Sampling Report, Champaign County.

Dear Mr. Reye,

On December 18, 2009, the The Ohio Environmental Protection Agency, Southwest District Office (OEPA/SWDO), was in receipt of the *October 2009 Semiannual Ground-Water Sampling Report*. At the request of the Division of Solid and Infectious Waste Management (DSIWM), the Division of Drinking and Ground Water (DDAGW) conducted a review of that document. The actual sampling event was conducted October 6 thru 15, 2009. The Urbana Closed Landfill is regulated under the requirements of Ohio Administrative Code (OAC) Rule 3745-27-10. A corrective measures monitoring program was approved August 26, 2009.

The review of this document has generated the following comments and violations:

Violations

1. The City of Urbana is in violation of OAC Rule 3745-27-10(F)(2)(e)(ii) requiring the owner/operator to monitor for the presence above background levels for parameters 1-66 of appendix I determined not to have been released. To prevent further violations, the City of Urbana needs to include the statistical evaluation that is conducted semiannually on parameters determined not to have been released. The Revised 2008 Ground Water Sample and Analysis Plan indicates that the statistical methods employed will be a combination of tolerance and/or prediction limits.

In addition to the missing statistical evaluation documented above, the facility should consider preparing and submitting an updated Statistical Analysis Plan (Stat Plan) as part of the modification to the Sampling and Analysis Plan (SAP). The statistical plan needs to document all statistical tests and procedures including tolerance limits, prediction limits and/or control charts, depending

Mr. Reye
June 28, 2010
Page 2

upon the applicability of the method. Include methods used such as updates to background, outlier testing, retesting, and trend testing at this facility. It is recommended the facility review and reference the new USEPA Unified Guidance dated March 2009. The 2009 Guidance replaces the 1989 and 1992 Unified Guidance. The web address for the March 2009 Unified Guidance is <http://www.epa.gov/osw/hazard/correctiveaction/resources/guidance/sitechar/gwstats/>.

More Information Needed to Determine Compliance

2. Compliance with OAC Rule 3745-27-10(C)(2)(g) cannot be determined at this time. Three trip blanks reported detections of vinyl chloride, trip #1 at 6.6 ug/L, trip #2 at 7.5 ug/L, and trip #3 at 7.4 ug/L. Trip blank #4 was not analyzed due to a laboratory error. No explanation was found regarding these detections. These detections are a quality assurance/quality control (QA/QC) concern and an explanation and/or further investigation is necessary. Please investigate and supplement the semiannual report with a statement and resolve any QA/QC concerns before the next sampling event. Also document whether the quality of sampling data has been affected and/or remains valid and useable for its intended purpose.

Failure to list specific deficiencies in the communication does not relieve you from complying with all applicable environmental rules and regulations.

Should you require any technical or regulatory assistance, please feel free to contact me at (937) 285-6648 or Greg Brown (DDAGW).

Sincerely,



Pat Willoughby, DSIWM/SWDO

PW/ka

cc: Greg Brown, DDAGW/SWDO