

Clinton Co  
Wilmington LF  
Groundwater  
Corr.



State of Ohio Environmental Protection Agency

Southwest District

401 East Fifth Street  
Dayton, Ohio 45402-2911

TELE: (937)285-6357 FAX: (937)285-6249  
www.epa.state.oh.us

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

August 11, 2008

Mayor David Raizk  
City of Wilmington  
69 North South Street  
Wilmington, Ohio 45177

**Re: Wilmington Landfill, Clinton County  
Notice of Violation- Review of the Statistical Report of Groundwater Quality  
& Groundwater Monitoring Plan**

Dear Mr. Raizk:

On June 15, 2008, the Ohio Environmental Protection Agency (Ohio EPA), Southwest District Office, Division of Solid and Infectious Waste Management (DSIWM) received a document titled Statistical Report of Groundwater Quality, dated June 2008 for the Wilmington Landfill. The document was submitted by Hull & Associates, Inc. on behalf of the City of Wilmington (City) owner/operator of the Wilmington Sanitary Landfill (Facility), located in Clinton County.

Pursuant to OAC Rule 3745-27-10(B)(3) states in part:

"All monitoring wells shall be designed, installed, and developed in a manner that allows the collection of ground water samples that are representative of ground water quality in the geologic unit being monitored, and that are in accordance with the following criteria:

- (a) Monitoring wells shall be cased in a manner that maintains the integrity of the monitoring well boreholes.
- (b) The annular space (i.e., the space between the borehole and the well casing) above the sampling depth shall be sealed to prevent the contamination of the samples and the ground water.
- (c) The casing shall be screened or perforated and surrounded by sand or gravel in such a way that allows for the following
  - (i) For the minimization of the passage of formation materials into the well.
  - (ii) For the monitoring of discrete portions of the uppermost aquifer system or any significant zones of saturation above the uppermost aquifer system.
- (d) The owner or operator shall document in the operating record, in accordance with rule 3745-27-09 of the Administrative Code, the design, installation, development, maintenance and abandonment of any monitoring wells, piezometers, and other measurement, sampling, and analytical devices.

- (e) The monitoring wells, piezometers, and other measurement, sampling, and analytical devices shall be operated and maintained to perform to design specifications throughout the life of the monitoring program.
- (f) Monitoring wells constructed or used for the purposes of this rule are not required to comply with Chapter 3745-9 of the Administrative Code.

DSIWM forwarded the documents to the Division of Drinking and Ground Waters (DDAGW) for review and comment. Based on a review of the information submitted, Ohio EPA provided the following comments:

1. The summary of ground water monitoring well installation and construction data is incomplete and inaccurate. The total depth listed in the Ground Water Monitoring Plan (GWMP) revised November 2007, and the total depths reported on the field forms during the April 2008 semiannual sampling event do not match. **The Facility's failure to provide the complete and accurate monitoring well installation and construction data is a violation of OAC Rule 3745-27-10(B)(3)(d). In order to resolve this concern the Facility needs to revise the Well Construction Summary Table (Table 1) in the GWMP.**
2. In November 2007 monitoring wells P-9S and P-10S were added to the ground water monitoring well network, however the well construction information submitted to Ohio EPA for review was incomplete. **This is also a violation of OAC Rule 3745-27-10(B)(3)(d). Please make the necessary revisions in Table 1 and resubmit for review.**
3. Numerous changes (redline and strikeouts) were added to Section 2.1 of the GWMP. Many of these changes were inaccurate and unnecessary as previous well depth(s) were acknowledged as accurate. If the Facility is uncertain of the depth of any monitoring well then the monitoring well depth needs to be measured and updated in the GWMP. **Furthermore, any changes to the GWMP need to be provided prior to the next semiannual sampling event. Please revise accordingly.**

**The Facility needs to revise section 2.1 of the GWMP and update Table 1- Summary of Ground Water Monitoring Well Installation and Construction Data. Please include well depth from the top of casing to the summary table as this value is used to calculate feet of standing water and purge volume. As a reminder, please ensure that Table 1 includes the construction data for monitoring wells P-9S, P-10S and P-1S, along with construction data for piezometers PZ-1 and PZ-2.**

In a letter dated February 8, 2008, Ohio EPA communicated the necessity for the Facility to revise the GWMP to include the new well installation and construction details along with the total depth measurements and updated Table 1 was discussed. To date, no response to this letter has been received by Ohio EPA. This is of particular concern to Ohio EPA given that you have a Permit to Install Application under review which proposes an increase in the approved

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landfill disposal capacity. As such, correction of the aforementioned items is expected to begin immediately. As a reminder, in accordance to OAC Rule 3745-27-07(A)(3), the Director shall not approve any PTI for a sanitary landfill unless the director determines the applicant has managed or operated such facility in substantial compliance.

Compliance with the requirements outlined in this letter shall not relieve you of your obligation to comply with other legal obligations, including, but not limited to, Chapters 3704, 3714, 3734, or 6111 of the Ohio Revised Code or under the Federal Clean Water Act, Clean Air Act, Comprehensive Environmental Response, Compensation, and Liability Act, or Resource Conservation and Recovery Act remedying conditions resulting from any release of contaminants to the environment.

If you have any further questions regarding Ohio EPA's comments, please contact Greg Brown at (937) 285-6407 or me at (937) 285-6046.

Sincerely,



Maria Lammers, R.S.

Environmental Specialist II  
Division of Solid and Infectious Waste Management

Enclosure: Copy of the February 8, 2008 letter from Ohio EPA

Cc: Matt Johannes, Clinton County Health District (enclosure)  
Donald Maher, Wilmington LF (enclosure)  
Greg Brown, Ohio EPA, SWDO-DDAGW  
Mohammad Finy, Hull & Associates, Inc. (enclosure)  
Karen Okonta, Hull & Associates, Inc. (enclosure)

ML/plh