



John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Scott J. Nally, Director

May 14, 2013

Mayor Randy Riley  
City of Wilmington  
69 North South Street  
Wilmington, Ohio 45177

**RE: Wilmington Landfill, Clinton County  
Statistical Report of Groundwater Quality dated February 2013  
Notice of Violation**

Dear Mayor Riley:

On February 15, 2013, Ohio EPA's Southwest District Office (SWDO) received a document titled "Statistical Report of Groundwater Quality", dated February 2013, for the Wilmington Sanitary Landfill (Facility) located in Clinton County. The document was prepared and submitted by Hull & Associates, Inc. on behalf of the city of Wilmington (City), owner/operator, of the Wilmington Sanitary Landfill.

The Division of Materials and Waste Management (DMWM) forwarded the report to the Division of Drinking and Ground Waters (DDAGW) for review and comment. Based on a review of the information submitted, Ohio EPA provides the following comments:

**VIOLATIONS**

1. The City failed to collect two (2) ground water parameters at the Facility, alkalinity and nitrate-nitrite, at least annually in accordance with Ohio Administrative Code (OAC) Rule 3745-27-10(D)(5)(c). Analytical results are missing for these two parameters in ground water monitoring wells: P-1, P-3, P-4, P-6, P-2S, P-6S, P-7S and P-8S for calendar year 2012. **The City's failure to monitor all constituents in Appendix I of OAC Rule 3745-27-10 for the Facility is a violation of OAC Rule 3745-27-10(D)(5)(c).**
2. The City failed to collect Appendix II parameters at the Facility from ground water well P-3S at least annually in 2012. Ground water monitoring well P-3S was designated an assessment monitoring well in the Assessment Plan because it is being used to determine rate and extent. Ground water assessment well P-3S was sampled for Appendix I parameters in April 2012; however, it was not sampled for either Appendix I or II parameters in December 2012.

**The City's failure to monitor all wells in the ground water assessment program for all parameters in Appendix II of OAC Rule 3745-27-10 at least annually for the Facility is a violation of OAC Rule 3745-27-10(E)(5)(b)(ii).**

- 3. Ohio EPA recommends the owner/operator redevelop ground water monitoring well P-8S prior to the next sampling event.**

Turbidity was documented in well P-8S at over 1000 NTUs during both the April and December 2012 sampling events. High turbidity may be a cause of elevated metals and variation observed between sampling events and appears to be an on-going problem in well P-8S. In April and December 2012, all other monitoring wells, except monitoring well P-8S, reported final turbidity values less than 12 NTUs and 34 NTUs, respectively.

Bailing is identified as a contingent sampling method for well P-8S and may be exacerbating the turbidity problem. In December, the Facility removed only 1.5 well volumes of the required minimum three (3) well volumes for volumetric purging. The well was not documented as purging dry, thereby raising concerns of potential sampling error. The January 2013 resampling event did document ground water well P-8S purging dry with sampling occurring after recharge. This raises the concern that well P-8S might not be able to produce sufficient ground water for representative sampling. Based on the December 5, 2012 field data sheet, the measured total depth is slightly deeper than the constructed depth indicating the well screen bottom may be compromised and possibly a source of turbidity problems.

**Ohio EPA recommends well P-8S be inspected for damage and redeveloped. If well P-8S cannot be rehabilitated and/or repaired, the Facility should evaluate replacing the well to satisfy the requirements of OAC Rule 3745-27-10(B).**

4. Ohio EPA recommends the owner/operator submit future alternate demonstration report(s) for the Facility with copies of field sampling form(s) and analytical results for well(s) and parameters supporting the demonstration. A comprehensive data package in one document is necessary in order to complete Ohio EPA's review.
5. Ohio EPA recommends that in future alternate demonstration reports for the Facility, you remove references to the Addendum to the U.S. EPA Interim Final Guidance and update and replace with the U.S. EPA 2009 Unified Guidance. The U.S. EPA 2009 Unified Guidance supersedes the earlier document.
6. Ohio EPA recommends that the owner/operator for the Facility correct Table C-1 in Appendix C – Statistical Analysis in the December 2012 Report.

Table C-1 did not identify barium in well P-8S as statistically significant but did identify lead as statistically significant. This does not agree with text throughout the report. Barium was statistically significant, and a revised Table C-1 is needed.

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.

Sincerely,



Maria Lammers, R.S.  
Environmental Specialist II  
Division of Materials and Waste Management

ML/tb

ec: Matt Johannes, Clinton County Health Department  
Don Maher, Wilmington Sanitary Landfill  
Karen Okonta, Hull and Associates Inc.