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Facility/Site/Location/Regulated Entity Name: HOLMES COUNTY LANDFILL	Your input is 22 characters long (Max 40).
Facility Address 1: 6601 TOWNSHIP ROAD 326	Your input is 22 characters long (Max 40).
Facility Address 2:	Your input is 0 characters long (Max 40).
Facility City: MILLERSBURG	
Facility State: OH	Facility ZIP: (00000 or 00000-0000) 44654
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John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

June 26, 2013

**RE: HOLMES COUNTY LANDFILL
GROUND WATER
NOTICE OF VIOLATION**

Rob Ault, Chairman
Holmes County Board of Commissioners
2 Court Street, Suite 14
Millersburg, OH 44654

Dear Mr. Ault:

The Ohio Environmental Protection Agency (Ohio EPA) has reviewed the following document:

Report for June 2012 Semiannual Ground Water Monitoring Event, dated September 4, 2012

On behalf of Holmes County SLF, North Point Engineering (NPE) and HzW Environmental Consultants, LLC (HzW) prepared and submitted to Ohio EPA the above referenced document. The *Ground Water Detection Monitoring Report* was received by Ohio EPA, Northeast District Office (NEDO) on September 5, 2012. Holmes County SLF is closed and conducting ground water detection monitoring in accordance with OAC Rule 3745-27-10(D) of the *Municipal Solid Waste Landfill Rules*.

The monitoring wells were sampled by HzW on June 26 and 27, 2012 for Appendix I parameters 18, 25, 33, 61 and 63-66, and field parameters 67-69 and 76. Two significant zones of saturation are monitored; the upper zone of Bedford Coal is monitored by ten wells and two piezometers, and the lower zone, shale, siltstone and sandstone is monitored by four wells.

Intra-well comparisons indicated a statistically significant increase (SSI) for cumulative sum (CUSUM) chart in the downgradient monitoring well UZ-1 sodium concentration, and no VOCs were detected at or above the PQL.

Ohio EPA has identified the following violations of Ohio Administrative Code (OAC):

- 1. Holmes County SLF is in violation of OAC 3745-27-10(D)(7)(b) for failing to submit a written notification to Ohio EPA of a statistically significant increase (SSI) over background no later than 75 days after withdrawing a**

sample from well UZ-1, that upon analysis demonstrated a statistically significant change in the sodium concentration via a CUSUM exceedance. Since UZ-1 was sampled on June 26 or 27, 2012, the owner/operator has been in violation of this rule since September 10, 2012.

To return to compliance with this rule, the owner/operator should immediately submit a written notice to Ohio EPA of the statistical exceedance and place a copy of this notification in the operating record in accordance with rule 3745-27-09 of the Administrative Code. The notification must indicate that well UZ-1 has shown a statistically significant increase in sodium over background levels for CUSUM.

- 2. Holmes County SLF is in violation of OAC 3745-27-10(E) requiring a ground water quality assessment monitoring program for UZ-1. The owner or operator has failed to comply with the requirements regarding ground water quality assessment monitoring after triggering for sodium. In accordance with paragraph (D)(7)(c) of this rule, if the owner or operator does not obtain approval to continue detection monitoring within two hundred ten days from initial sampling, the owner/operator shall comply with the provisions of paragraph (E) of this rule.**

Detection monitoring well UZ-1 entered assessment monitoring activities on January 23, 2013, 210 days after the well was initially sampled. To date, Holmes County SLF has neither submitted a ground water quality assessment plan nor conducted any of the assessment ground water monitoring activities at this well as required by this rule.

Well UZ-1 also had a CUSUM trigger for sodium during the December 2012 second semiannual ground water monitoring event. An alternate source demonstration (ASD) was submitted for monitoring well UZ-1 dated April 29, 2013, but failed to be submitted by the January 23, 2013 deadline.

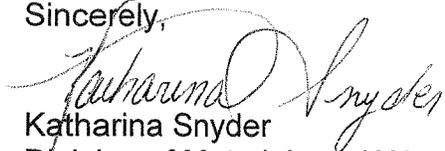
To return to compliance with this rule, the owner/operator should immediately submit a ground water quality assessment plan for UZ-1 and conduct Appendix I and II ground water sampling at UZ-1 and a corresponding background well in the Bedford coal zone.

Nothing in this letter shall be construed to authorize any waiver from the requirements of any applicable state or federal laws or regulations. This letter shall not be interpreted to release the Entity from responsibility under Chapters 3704, 3714, 3734, or 6111 of the Ohio Revised Code or under the Federal Clean Water or Comprehensive Environmental Response, Compensation, and Liability Acts for remedying conditions resulting from any release of contaminants to the environment.

Rob Ault, Chairman
Holmes County Board of Commissioners
June 26, 2013
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If you have any questions, contact me at (330) 963-1257.

Sincerely,

A handwritten signature in cursive script, appearing to read "Katharina Snyder".

Katharina Snyder
Division of Materials and Waste Management

KS:cl

cc: Katherine Springer Amey, DDAGW-NEDO
Jon Croup, Holmes County Health Department
File: [Singh/LAND/HOLMES/GRO/38]
DMWM #4657