



Department:

Subdepartment:



DMWM



<NONE>

Program:



DMWM - Municipal Solid Waste Landfills

Office Location:

Medium:



NEDO



LAND

Doc Type:

Doc Subtype:



NOV



<NONE>

Facility County:

Facility ID:



38 - HOLMES



22641

Date:



6/26/2013

Facility/Site/Location/Regulated Entity Name:



HOLMES COUNTY LANDFILL

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Facility Address 1:



6601 TOWNSHIP ROAD 326

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MILLERSBURG

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Facility ZIP: (00000 or 00000-0000)



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Project Name:

Project Type:



Latitude:

Longitude:





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:

*Ground Water Detection Monitoring Report, December 2012 Semiannual Event,
dated February 28, 2013*

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 received by Ohio EPA Northeast District Office (NEDO) on March 1, 2013. Holmes County SLF is closed and under the 2003 Revision to Ohio Administrative Code (OAC) Rule 3745-27-10, and at the time of this sampling event, in accordance with OAC Rule 3745-27-10(D), the detection monitoring program.

The monitoring wells were sampled by NPE on December 17-19, 2012 for Appendix I parameters 1-78. 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.

No VOCs were detected above the practical quantitation limit (PQL) in any downgradient well during the sampling event. There was a statistically significant increase (SSI) for a CUSUM exceedance at downgradient well UZ-1 for sodium, and the actual value is below the control limit.

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

- 1. Holmes County SLF remains 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 not later than seventy-five 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 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 210 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 on June 27, 2012. 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.

Ohio EPA has the following recommendation:

It is recommended that Holmes County SLF switch to low-flow purging, also referred to as low-stress purging, low-impact purging, minimal drawdown purging, or Micropurging® instead of disposable bailers for obtaining ground water samples.

When sampling for contaminants or parameters that may be biased by turbidity, Ohio EPA recommends stabilizing the turbidity readings at or below 10 NTUs (Yeskis and Zavala, 2002). It is recognized that some ground water zones may have natural turbidity higher than 10 NTUs. If turbidity is being used as a stabilization

Rob Ault, Chairman
Holmes County Board of Commissioners
June 26, 2013
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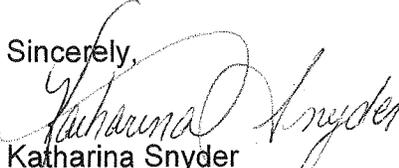
parameter, the stabilization criteria would be 10 percent. During the last round of sampling, Holmes County SLF had sampling turbidity values as high as 56.7 NTU. The TGM: Chapter 10: Ground Water Sampling Pages 10-29 Revision 1, February 2006, states that low-flow purging is a method of well purging/sampling that does not require large volumes of water to be withdrawn. The term low-flow refers to the fact that water enters the pump intake with a low velocity. The objective is to minimize drawdown of the water column in the well, avoid disturbance of the stagnant water above the well screen, and draw fresh water through the screen at a rate that minimizes sample disturbance. Usually, this will be a rate less than 500 ml/min and may be as low as 100 ml/min. Once drawdown stabilizes, the sampled water is isolated from the stagnant water in the well casing, thus eliminating the need for its removal (Powell and Puls, 1993). The method is based on the principle that water within the screened zone passes through continuously and does not mix with water above the screen. After drawdown has stabilized and indicator parameters have stabilized, water in the screen can be considered representative of water in the formation. Given this, purging of multiple well volumes is not necessary (Kearl et al., 1994; Powell and Puls, 1992; Nielsen and Nielsen, 2002, ASTM Method D6771-02).

For Holmes County SLF, low-flow sampling would offer several advantages. It lessens the volume of water to be purged and disposed, reduces aeration or degassing, maintains the integrity of the filter pack, and minimizes disturbance within the well water column and surrounding materials, thus reducing turbidity which is an issue at Holmes County SLF.

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.

If you have any questions, contact me at (330) 963-1257.

Sincerely,



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 #4936