Ohio EPA
40 years and moving forward

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

September 5, 2013

Mr. Robert Fudge, Mayor
Village of Cedarville
P.O. Box 51
Cedarville, Ohio 45314

RE: Village of Cedarville Closed Landfill
Notice of Violation

Dear Mayor Fudge:

Ground water monitoring data for the May 30, 2013 sampling event for the closed Cedarville Landfill was submitted on July 18, 2013 to Ohio EPA Southwest District Office (SWDO). The following violations and comments are a result of the review:

1. **The owner/operator of the closed Cedarville Landfill is in violation of Ohio Administrative Code (OAC) Rule 3745-27-10(C)(8).** No statistical analysis of the semiannual ground water data was submitted as required by OAC Rule 3745-27-10(C)(8) which states:

   Determination of a statistically significant increase over background. The owner or operator shall determine whether or not there is a statistically significant increase over background for each parameter or constituent required to be statistically analyzed within the ground water monitoring program. The owner or operator shall make this determination each time he assesses ground water quality. To determine whether a statistically-significant increase or decrease has occurred, the owner or operator shall compare the ground water quality of each parameter or constituent at each downgradient ground water monitoring well to the background value of that parameter or constituent according to the statistical procedures specified in paragraphs (C)(6) and (C)(7) of this rule.

   In order to return to compliance, Cedarville needs to statistically evaluate and report semi-annual detection monitoring data for Appendix I parameters (1-15 and 63-66) in accordance with OAC Rule 3745-27-10(C)(8).

2. **The owner/operator of the closed Cedarville Landfill is in violation of OAC Rule 3745-27-10(C)(3)(b).** No determination of the direction of ground water flow was made for the uppermost aquifer, as required by OAC Rule 3745-27-10(C)(3)(b), which states:

The owner or operator shall at least semiannually and in conjunction with any major sampling event involving more than half the wells in the system or zone monitored determine, for the uppermost aquifer system and for all significant zones of saturation monitored, the direction of ground water flow each time ground water elevation measurements are performed.

To date, no ground water flow maps have ever been submitted for the Cedarville Landfill as required by rule. In order to return to compliance, Cedarville needs to determine the direction of ground water flow each time ground water elevation measurements are obtained and submit the information with each semiannual report.

3. **The owner/operator of the closed Cedarville Landfill is in violation OAC Rule 3745-27-10(C)(3)(d).** Potentiometric surface maps were not submitted as required by OAC Rule 3745-27-10(C)(3)(d) which states:

   Potentiometric maps shall be constructed using the collected ground water elevation measurements and shall be included with the sampling data submittal.

   Please provide the potentiometric surface maps with each semiannual sampling report.

4. **The owner/operator of the closed Cedarville Landfill is in violation of OAC Rule 3745-27-10(A)(5)**. OAC Rule 3745-27-10(A)(5) requires that a qualified ground water scientist shall certify, in accordance with Rule 3745-27-09 of the Administrative code, any reports and data, submitted in accordance with the rule.

   No certification statement by a qualified ground water scientist appeared in the village of Cedarville's Semiannual Monitoring Well Sample Collection Report (dated October 5, 2012). To return to compliance, Ohio EPA requests that Cedarville consult with a qualified ground water scientist regarding any future data submittal and ensure that an appropriate certification statement appears in all future semiannual reports.

5. **The owner/operator of the closed Cedarville Landfill is in violation OAC Rule 3745-27-10(C)(10) (b), (d), (e) and (f).** Required information is not being submitted with the ground water data, this is a violation of OAC Rule 3745-27-10(C)(10), (b), (d), (e), and (f), which states in part:

   Submission of results. All ground water elevation, sample analysis and statistical analysis results generated in accordance with paragraphs (B), (C), (D), (E) and (F) of this rule shall be submitted to Ohio EPA not later than seventy-five days after sampling the well. . . The accompanying text shall consist of, at a minimum, the following:…
   (b) Field and laboratory quality assurance / quality control (QA/QC) data…
   (d) Data summary table(s).
   (e) Statistical analysis results and summary table(s) including the results from any test for normality.
   (f) The potentiometric maps required by paragraph (C)(3) of this rule.

The information provided by the facility only included the analytical results from the laboratory and did not include the following: field and laboratory quality assurance / quality control data, statistical analysis, data summary, statistical analysis results or potentiometric maps results as required by OAC Rule 3745-27-10(C)(10)(b), (d), (e), and (f). The required information must be submitted with each semiannual sampling data submittal.

6. Previous lab submittals did not include a chain of custody (COC) as required by rule. The latest data submittal included a COC. Cedarville Landfill is no longer in violation of Ohio Administrative Code (OAC) Rule 3745-27-10(C)(10)(c).

Cedarville must take appropriate steps to ensure that the violations in this correspondence are corrected and all future ground water sampling events comply with OAC Rule 3745-27-10. If you have questions, please contact me or Jay Cavender at (937) 285-6357.

Sincerely,

Jill Olberding

Jill Olberding, R.S.
Environmental Specialist II
Division of Materials and Waste Management

JO/tb

ec: Jay Cavender, Ohio EPA DDAGW/SWDO
Debbie Leopold, Greene County Combined Health District