



State of Ohio Environmental Protection Agency

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August 26, 2009

Bruce Evilsizor  
Director of Administration  
City of Urbana  
205 South Main Street  
Urbana, Ohio 43078

**Re: Closed City of Urbana Landfill, Champaign County  
Corrective Measures Plan - Selection of Corrective Measure**

Dear Mr. Evilsizor:

On November 24, 2008, the Ohio Environmental Protection Agency (Ohio EPA), Southwest District Office (SWDO) received a revised corrective measures plan titled City of Urbana Closed Landfill Corrective Measures Plan (2008 CMP) for the closed City of Urbana Landfill (Facility). Revisions to the 2008 CMP were received on January 21, 2009. The 2008 CMP was submitted by the City of Urbana pursuant to Ohio Administrative Code (OAC) Rule 3745-27-10(F). The Facility operated between 1953 and 1987 and received municipal, commercial, and industrial solid wastes.

A public meeting for a previous corrective measures plan was held on September 13, 2004. A public meeting for the 2008 CMP was held on February 24, 2009. Both meetings were held in Urbana, Ohio.

In "Section 5. Recommended Remedy" of the 2008 CMP, the City of Urbana recommends two of the four evaluated corrective measures:

1. "Improve Landfill Cap": The City of Urbana proposes to add material to the existing cap to increase the slope of the cap to two percent. This improvement should reduce leachate generation by eliminating ponding, promoting surface water runoff, and minimizing infiltration of water into and through the waste mass. In addition, the City of Urbana will maintain vegetative cover on the landfill.
2. "Natural Attenuation": The City of Urbana proposes employing natural attenuation to reduce the concentration of waste-derived constituents in ground water. To determine the effectiveness of natural attenuation, ground water monitoring wells and private water well systems will be monitored in accordance with the corrective measures monitoring program contained within the 2008 CMP

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

and in accordance with the sampling and analysis plan titled City of Urbana Closed Landfill Ground-Water Sample and Analysis Plan, Revised December 2008 (2008 SAP), which was received by Ohio EPA, SWDO on January 7, 2009.

The 2008 CMP also contains self implementing contingency plans. One self-implementing contingency plan requires the City of Urbana to provide bottled water or filtration devices to affected residence(s) if two consecutive private water well system samples contain waste-derived constituents at concentrations greater than one half the maximum contaminant level (MCL) for any contaminant with an MCL.

Ohio EPA has reviewed the 2008 CMP and has determined that it fulfills the requirements of OAC Rule 3745-27-10(F). Therefore, pursuant to OAC Rule 3745-27-10(F)(10), I hereby select "Improve Landfill Cap" and "Natural Attenuation," as described above, as the corrective measures that are to be implemented at the Facility.

The City of Urbana shall implement the 2008 CMP at the Facility and shall comply with the following conditions:

#### **CONDITIONS**

1. In accordance with OAC Rule 3745-27-10(F), the City of Urbana shall implement the selected corrective measures at the Facility.
2. Not later than 60 days after completing each phase of cap improvements, the City of Urbana shall provide Ohio EPA, SWDO a written notice of completion including the date of completion and a narrative describing the work completed. The final notice shall be submitted with a topographic drawing depicting new cap elevations.
3. The City of Urbana shall increase the frequency of explosive gas monitoring to at least once per calendar year quarter for two years following the date of completion of the third phase of cap improvements.
4. The Facility's ground water monitoring wells and private water well systems shall be sampled in accordance with the 2008 CMP and 2008 SAP.
5. A reevaluation of the selected corrective measures, as specified in "Section 5.3 Schedule of Implementation" of the 2008 CMP, shall be completed and submitted in writing to Ohio EPA, SWDO not later than three years after the effective date of this letter and every three years thereafter. If after reevaluation the City of Urbana determines that any of the selected corrective measures has become ineffective, the City of Urbana shall, not later than 120 days after submittal of the

reevaluation, submit a work plan including a schedule of implementation for additional corrective measures or modifications to the selected corrective measures. At a minimum, the work plan shall contain a reevaluation of Soil Vapor Extraction (SVE) as a potential corrective measure. When SVE is reevaluated, the City of Urbana shall determine whether currently available methods or techniques or new methods or techniques could achieve compliance with OAC Rule 3745-27-10(F).

### **END OF CONDITIONS**

You are hereby notified that this action of the Director of Ohio EPA (Director) is final and may be appealed to the Environmental Review Appeals Commission (Commission) pursuant to Ohio Revised Code Section 3745.04. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00 which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Commission at the following address:

Environmental Review Appeals Commission  
309 South Fourth Street  
Room 222  
Columbus, Ohio 43215

If you have any questions concerning this letter, please contact Greg Brown or Jill Olberding of Ohio EPA, Southwest District Office at 937-285-6357.

Sincerely,

Chris Korleski  
Director

cc: Jill Olberding, Ohio EPA, DSIWM, SWDO  
Greg Brown, Ohio EPA, DDAGW, SWDO  
Shelia Hiddleson, RN, MS, Champaign County Health District