



**Environmental  
Protection Agency**

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

OHIO E.P.A.

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Mr. John Jones  
Sanitary Facilities Manager  
Preble County Landfill  
4239 U.S. Route 127 South  
Eaton, Ohio 45320

I certify this to be a true and accurate copy of the  
official documents as filed in the records of the  
Environmental Protection Agency.

By: Scott J. Nally Date: 3-3-11

**Re: Preble County Landfill, Preble County  
Corrective Measures Plan - Selection of Corrective Measures**

Dear Mr. Jones:

On January 19, 2011, the Ohio Environmental Protection Agency (Ohio EPA), Southwest District Office (SWDO) received a revised corrective measures plan titled Corrective Measures Plan, Preble County Landfill, Preble County, Ohio (CMP) for the Preble County Landfill (Facility). The original CMP was received February 12, 2009 and revisions were submitted on September 11, 2009, and January 29, August 2, and December 23, 2010. The CMP was prepared by Brown and Caldwell for the Preble County Board of Commissioners and submitted by the Facility pursuant to Ohio Administrative Code (OAC) Rule 3745-27-10(F). The Facility is an active, licensed municipal solid waste landfill.

During the Spring 2007 ground water sampling event, an exceedance of 1,1-dichloroethane, a volatile organic compound (VOC), was detected in well SZ-2. As a result, the Facility conducted a ground water quality assessment and followed with a CMP submittal. The County subsequently held a public meeting on March 30, 2009, discussing the CMP. The exceedance is believed to be due to landfill gas seeping into the Phase 1 leachate collection pipe from recently-landfilled waste placed around the pipe, which causes gas from the new waste to migrate into the pipe. In addition, the removal of existing waste and replacement with less-compacted waste that occurred during a Facility expansion provides a preferential pathway for gas to migrate, possibly into an area of the landfill with few gas vents, enabling subsurface migration outside the limits of waste. Landfill gas may be able to permeate areas of the Facility's liner that leachate cannot.

In Section 5.2, "Recommended Remedial Procedure" and Figure 8 of the CMP, the owner/operator recommends a self-implementing, stepped approach using two of the five evaluated corrective measures, RP-2 and RP-3, which are each segmented into "A" and "B" steps. The remedial procedure order will be RP-2A, RP-3A, RP-2B, RP-3B.

1. "RP-2 Leachate Manhole Venting": The owner/operator proposes to vent landfill gas out of the leachate collection system prior to contact with ground water and into the atmosphere. RP-2A specifically includes the installation of vents in leachate manholes MH-7, MH-8, MH-9, and the T vent. RP-2B includes initiation of extraction of the landfill gas (LFG) through the vents installed in RP-2A.

2. "RP-3 Enhanced Gas Venting": The owner/operator proposes construction and operation of additional vertical gas vents to vent landfill gas prior to contact with ground water. RP-3A includes the construction of vertical gas vents. The radius of influence of the vents will be overlapped to provide a passive system along the northeast portion of the landfill. RP-3B includes initiation of forced venting of the LFG through the vents installed in RP-3A by connecting the gas vents with piping to a central location using a vacuum, where the gas would be forced into the atmosphere.

These improvements should achieve compliance with OAC Rule 3745-27-10(F)(2) by venting landfill gas that is believed to be contributing to concentrations of VOCs in the SZ-2 area. Ground water monitoring and gas monitoring at select monitoring wells and vapor probes for VOCs will evaluate the effectiveness of the procedure and whether additional remedial procedures are needed in accordance with Figure 8 and Figure 9 of the CMP.

Ohio EPA has reviewed the 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 the two aforementioned corrective measures that are to be implemented in a self-implementing, stepped approach at the Facility by the owner/operator. This includes corrective measures ground water monitoring as specified within the Ground Water Corrective Measures Monitoring Plan found within the January 2011 CMP.

You are hereby notified that this action of the Director of Environmental Protection (Director) is final and may be appealed to the Environmental Review Appeals 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 made payable to "Treasurer, State of Ohio." The Commission, in its discretion, may reduce the fee if by affidavit it is demonstrated 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 Environmental Review Appeals Commission at the following address:

Mr. John Jones  
Preble County Landfill  
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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,

A handwritten signature in cursive script, appearing to read "Scott J. Nally".

Scott J. Nally  
Director

cc: Mr. Scott Hester, DSIWM,  
Ms. Jill Olberding, DSIWM, SWDO  
Mr. Greg Brown, Ohio EPA/SWDO/DDAGW  
Mr. Gary Walker, RS, Preble County Health Department