Ohio | Environmental Protection Agency
John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

OHIO E.P.A.
OCT 25 2011
ENTERED DIRECTOR'S JOURNAL

October 25, 2011

Crawford County Board of Commissioners
Crawford County Courthouse
112 East Mansfield Street
Bucyrus, Ohio 44820

I certify this to be a true and accurate copy of the official documents as filed in the records of the Ohio Environmental Protection Agency.
By: [signature] Date: 10-25-11

Mr. Gary Adkins
Santek Environmental
5128 Lincoln Highway East
Bucyrus, Ohio 44820

**Re: Crawford County Landfill, Crawford County**
**Ohio Administrative Code (OAC) Rule 3745-27-10(D)(7)(c)(ii) Approval**

Dear Commissioners and Mr. Adkins:

On September 14, 2011, the Ohio Environmental Protection Agency (Ohio EPA), Division of Materials and Waste Management (DMWM), Northwest District Office (NWDO), received a document titled *"OAC Rule 3745-27-10(D)(7)(c) Alternate Source Demonstration for Chloride at Monitoring Well P-7R and Sodium at Monitoring Well P-8RR"* dated September 14, 2011, for Crawford County Landfill (Facility), located in Crawford County. This document was submitted by Mannik & Smith, Inc. on behalf of the owner/operator of the Facility and included a request to continue detection monitoring at P-7R, and P-8RR despite a statistically significant increase in the data collected for P-7R and P-8RR during the March 28, 2011, ground water sampling event at the Facility.

According to the document, analysis of the ground water detection monitoring data indicated that the following statistically significant changes were detected: chloride in monitoring well P-7R, and sodium in monitoring well P-8RR.

Pursuant to OAC Rule 3745-27-10(D)(7)(c)(ii), the owner or operator may demonstrate that a source other than the sanitary landfill facility caused the contamination, or that the statistically significant change resulted from error in sampling, analysis, or statistical evaluation or natural variation in ground water quality. A report documenting this demonstration must be submitted to and approved by Ohio EPA. If the owner or

operator does not obtain approval to continue detection monitoring within two hundred ten (210) days from initial sampling, the owner or operator is required to comply with the provisions of OAC Rule 3745-27-10(E) for ground water quality assessment monitoring.

The September 14, 2011, document concluded that the statistically significant changes for chloride in monitoring well P-7R, and sodium in monitoring well P-8RR were due to natural variation in ground water quality, and not as a result of impact from the landfill.

Ohio EPA has reviewed the applicable information and concurs with the demonstration for chloride in monitoring well P-7R, and sodium in monitoring well P-8RR, included in the September 14, 2011, document. Therefore, pursuant to OAC Rule 3745-27-10(D)(7)(c)(ii), the owner or operator is hereby authorized to continue the detection monitoring program at the Facility for monitoring wells P-7R and P-8RR.

Should future or existing ground water sampling results indicate statistically significant changes in ground water monitoring parameters, the owner/operator will be required to either enter into assessment monitoring in accordance with OAC Rule 3745-27-10(E) or obtain approval to remain in the detection monitoring program.

A detailed account of Ohio EPA's review of the ground water demonstration will be sent to you under separate cover.

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:

Environmental Review Appeals Commission
77 South High Street, 17th Floor
Columbus, Ohio 43215

If you have any questions concerning this letter, please contact Tyler Madeker of Ohio EPA, NWDO at 419-373-3078.

Sincerely,

Shannon Nabors, Chief
Northwest District Office
for Scott J. Nally, Director

/llr

pc: Kate Siefert, Crawford County Health Department
Eric Van Heyde, The Mannik & Smith Group, Inc.
Mr. Rob Burnette, Santek Environmental
Mike Reiser, DMWM-NWDO
Jack Leow, DDAGW-NWDO
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