



State of Ohio Environmental Protection Agency

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Alan Ruffell, Landfill Manager  
Hoffman Road Landfill  
3962 Hoffman Road  
Toledo, Ohio 43611

**Re: Hoffman Road Landfill, Lucas County  
Ohio Administrative Code (OAC) Rule 3745-27-10(D)(7)(c)(ii) Authorization**

Dear Mr. Ruffell:

On February 27, 2004, the City of Toledo submitted a request, pursuant to OAC Rule 3745-27-10(D)(7)(c)(ii), to the Ohio Environmental Protection Agency (Ohio EPA), Division of Solid and Infectious Waste Management (DSIWM), Northwest District Office (NWDO) to continue detection ground water monitoring for several monitoring wells at the Hoffman Road Landfill (Facility) located in Lucas County. Specifically, the request documented false positive demonstrations for the following:

- chloride in MW-3, MW-5, MW-12, and MW-14; and
- sodium in MW-3, MW-14B, and MW-23B.

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 increase over background resulted from error in sampling, analysis, or statistical evaluation or natural variation in ground water quality. The February 27, 2004, demonstration concluded that the statistically significant increases of sodium in monitoring wells MW-14B and MW-23B and chloride in MW-12 were not the result of a release from the landfill. The demonstration concluded that the statistical false positives are due to natural variability.

Based upon a review of the applicable information, Ohio EPA concurs with the above conclusion. Therefore, pursuant to OAC Rule 3745-27-10(D)(7)(c)(ii), I hereby approve continuing the detection monitoring program for the following monitoring wells and constituents:

- sodium in MW-14B and MW-23B; and
- chloride in MW-12.

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

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Jennette Bradley, Lieutenant Governor  
Christopher Jones, Director

approval to remain in the detection monitoring program.

You are hereby notified that the action of the director of Ohio EPA explained in the previous paragraphs for sodium in monitoring wells MW-14B and MW-23B and chloride in MW-12 is final and may be appealed to the Environmental Review Appeals Commission (Commission) pursuant to Ohio Revised Code (ORC) 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. It must be filed with the Commission within thirty (30) days after notice of the director's action. A copy of the appeal must be served on the director within three (3) days of filing with the Commission. 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

Based on the information included in the February 27, 2004, report, you have not provided sufficient evidence to demonstrate that the increases in chloride in monitoring wells MW-3, MW-5, and MW-14 and sodium in MW-3 were not the result of the landfill. Therefore, I decline to grant approval to continue detection monitoring for those constituents at those monitoring wells.

If you have any questions concerning this letter, please contact Beth Skulina of Ohio EPA, NWDO at (419) 373-3141.

Sincerely,

Christopher Jones  
Director

CH/MM/sw

cc: Beth Skulina, DSIWM-NWDO  
Abdul Smiley, DSIWM-NWDO  
Mike Beal, DDAGW-NWDO  
Jack Leow, DDAGW-NWDO  
Scott Hester, DSIWM-CO  
Jodi Vaughn, Toledo-Lucas County Health Department  
Karen Okonta, Hull & Associates, Inc.  
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