



State of Ohio Environmental Protection Agency

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Mr. Erick Palmer
Suburban Recycling & Disposal Facility, North
3415 Township Road 447
Glenford, Ohio 43739

**RE: LICKING COUNTY; SUBURBAN RECYCLING & DISPOSAL FACILITY,
OAC 3745-27-10(D)(7)(c)**

Dear Mr. Palmer:

During September 2004, a ground water sampling event was conducted at the Suburban Recycling & Disposal Facility (RDF) North. Results from this event indicate that monitoring well MW-3A statistically triggered for sodium, MW-1C statistically triggered for ammonia and MW-5CR had a statistical significant increase for barium.

Ohio Administrative Code (OAC) 3745-27-10(D)(7)(c)(ii) requires facilities who have identified statistically significant increases in ground water monitoring parameters to receive approval from the Director in order to remain in detection monitoring. If a facility does not receive approval within 210 days of ground water sampling, the facility is required to initiate their assessment monitoring program.

On January 14, 2005, Waste Management submitted to the Ohio Environmental Protection Agency (Ohio EPA) a request pursuant to OAC 3745-27-10(D)(7)(c)(ii), to continue detection monitoring for sodium at monitoring well MW-3A and barium at well MW-5CR at Suburban RDF, North, located in Licking County.

In December 2004, all three wells were resampled for those parameters that were statistically significant. The resample for sodium in monitoring well MW-3A came back slightly over the statistical control limit, (sample result 10.3 mg/L). Suburban RDF believes that the result is most likely related to the ground water variability at the site supported by the fact that typical sodium concentrations around the site are 22-70 mg/L; no other indicator parameters are statistically significant and no VOC's were detected at the site.

Bob Taft, Governor
Jennette Bradley, Lieutenant Governor
Joseph P. Koncelik, Director

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The barium resample for MW-5CR remained out of control with respect to the CUSUM statistic. However, both the initial and resample events are within the background range for upgradient well MW-3B and lower than the background range for upgradient well MW-2C. Suburban RDF North believes that this is related to the variability in the groundwater and not the result of the landfill.

The statistically significant ammonia result in MW-1C was not confirmed in the December 15, 2004 resample. Therefore the initial ammonia result is a false positive and no further action is required with respect to ammonia in MW-1C.

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 the sampling, analysis, or statistical evaluation or from natural variation in ground water quality. The January 14, 2005, report concludes that the statistically significant increase of sodium in MW-3A and barium in MW-5CR was due to natural variation in ground water quality.

Ohio EPA has reviewed the report and we concur with the above conclusion. Therefore, pursuant to OAC Rule 3745-27-10(D)(7)(c)(ii), I hereby approve keeping monitoring well MW-3A and MW-5CR in the detection monitoring program for sodium and barium respectively.

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 the assessment monitoring program in accordance with OAC Rule 3745-27-10(E) or obtain approval to remain in detection monitoring in accordance with OAC Rule 3745-27-10(D)(7)(c).

You are hereby notified that this action of the Director of Environmental Protection 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 ground 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 S. Fourth St.
Room 222
Columbus, OH 43215

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If you should have any questions or comments on the above, feel free to contact Laura Parkinson in the Central District Office at (614) 728-3889.

Sincerely,

Craig Butler, Chief, Central District Office
for Joseph Koncelik, Director
Ohio Environmental Protection Agency

cc: Mike Wilson, Licking Co. Health Dept.
Al Razem, Eagon and Associates, Inc.
DDAGW/CDO
Duane Snyder, DSIWM/CDO