



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,  
GROUND WATER SAMPLING EVENT AND FALSE POSITIVE DEMONSTRATION**

Dear Mr. Palmer:

On December 2, 2005, the Ohio Environmental Protection Agency (Ohio EPA), Division of Solid and Infectious Waste Management (DSIWM), Central District Office (CDO), received a document titled "2005 Second Semiannual Ground-Water Statistics", dated December 1, 2005, for the Suburban North Recycling and Disposal Facility located in Licking County. This document was submitted by Al Razem, Eagon & Associates, Inc., on behalf of Waste Management, Inc., and contains the ground water sampling results and the statistical analysis from the initial September 21, 2005 sampling event and the November 2, 2005 resample 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: MW-3A (sodium), MW-5CR (barium), MW-1C, MW-2A (chloride) and MW-1C and MW-5CR (ammonia).

Verification sampling was performed on November 2, 2005. Analysis of the re-sampling data demonstrated that the statistically significant changes for ammonia in monitoring wells MW-1C and MW-5CR were false positives. Therefore, monitoring wells MW-1C and MW-5CR were automatically returned to the detection monitoring program pursuant to OAC Rule 3745-27-10(D)(7)(c)(i) for ammonia. Ohio EPA acknowledges the return of these wells to the detection monitoring program for ammonia. However, the re-sampling data verified the statistically significant changes for sodium in MW-3A, barium in MW-5CR, and chloride in MW-1C and MW-2A.

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.

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

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The December 1, 2005 document concluded that the statistically significant changes for sodium in MW-3A, barium in MW-5CR, and chloride in MW-1C and MW-2A, were due to natural ground water quality variability at the site, and not as a result of impact from the landfill. Monitoring wells MW-3A, MW-5CR, MW-1C and MW-2A were initially sampled on September 21, 2005.

Ohio EPA has reviewed the applicable information and concurs with the demonstration included in the December 1, 2005 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 MW-3A, MW-5CR, MW-1C and MW-2A.

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

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. 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 after 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

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

pc: Mike Wilson, Licking County Health Department  
Al Razem, Eagon and Associates  
DDAGW/CDO  
Duane Snyder, DSIWM/CDO