



State of Ohio Environmental Protection Agency

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Mr. Rick Dodge
SWACO
6220 Young Road
Grove City, Ohio 43123

RE: FRANKLIN COUNTY LANDFILL; FRANKLIN COUNTY, Ohio Administrative Code (OAC) Rule 3745-27-10(D)(7)(c)(ii) Approval

Dear Mr. Dodge:

On December 6, 2005, the Ohio Environmental Protection Agency (Ohio EPA), Division of Solid and Infectious Waste Management (DSIWM), Central District Office (CDO), received a document titled "Statistical Analysis of Ground Water Quality Data September 2005 Sampling Event", dated December 5, 2005, for the Franklin County Landfill located in Franklin County. This document was submitted by the Solid Waste Authority of Central Ohio and contains the ground water sampling results and the statistical analysis from the September 2005 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 wells MW-6a, MW-4a, MW-8, MW-11m and MW-1r, MW-4 (sodium), MW-16B (chloride) and MW-2b (alkalinity and sodium).

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.

Previous documents concluded that the statistically significant changes for chloride at monitoring wells MW-6a, MW-4a, MW-8, MW-11m and MW-1r, sodium in MW-4, alkalinity and sodium in MW-2b, were due to either a change in laboratories or from natural variation in ground water quality and not a result of impact from the landfill. As such, the facility was allowed to continue with detection monitoring at those well locations.

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

Mr. Rick Dodge
SWACO
Page -2-

On April 11, 2006, Ohio EPA received a demonstration for the chloride in monitoring well MW-16B. This demonstration concluded that the statistically significant change for chloride at monitoring well MW-16B was due to a change in ground water flow to a more northerly direction thus introducing the influence of road salt from de-icing activities on I-71.

Ohio EPA has reviewed the applicable information and concurs with the demonstration included in the April 11, 2006, 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 well MW-16B.

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 South Fourth Street
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

cc: Jeff Grose, Franklin County Health Department
DSIWM/CDO
DDAGW/CDO

CB/LP/slj Chloride16Bdmonst