



State of Ohio Environmental Protection Agency

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January 31, 2008

Mr. Paul Flory, Environmental Compliance Manager  
Solid Waste Authority of Central Ohio  
4329 London-Groveport Road  
Grove City, OH 43123

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

Dear Mr. Flory:

On December 10, 2007, 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 Detection Monitoring Results, 2007 Second Semiannual Event" dated December 6, 2007, for the Franklin County Landfill (Facility) located in Franklin County. This document was submitted by Eagon & Associates, Inc., on behalf of the Facility, and contains the ground water sampling results and the statistical analysis from the September 2007 ground water sampling event at the Facility. This document also contains alternate source demonstrations for monitoring wells MW-6a, MW-16B, MW-17B, and MW-11m.

According to the document, analysis of the ground water detection monitoring data indicated that the following statistically significant changes were detected: chloride in MW-6a; chloride in MW-11m; chloride and sodium in MW-16B; chloride and sodium in MW-17B; and sodium in MW-17D.

Verification sampling was performed on November 13, 2007. Analysis of the re-sampling data demonstrated that the statistically significant changes in sodium for MW-17B and MW-17D were false positives. Therefore, monitoring well MW-17D was automatically returned to the detection monitoring program pursuant to OAC Rule 3745-27-10(D)(7)(c)(i). However, the re-sampling data verified the statistically significant changes for chloride in MW-6a, chloride in MW-11m, sodium and chloride in MW-16B, and chloride in MW-17B.

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 the initial sampling, then 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 December 6, 2007, document concluded that the statistically significant change for chloride at MW-6a and MW-11m was due to natural variation in ground water quality, and not as a result of impact from the Facility. This document also concluded that the significant changes in sodium and chloride in MW-16B were due to a source other than the Facility. The December 6, 2007, document concluded that the statistically significant changes for chloride at MW-17B is due to natural variation in ground water quality.

Ted Strickland, Governor  
Lee Fisher, Lieutenant Governor  
Chris Korleski, Director

Ohio EPA has reviewed the applicable information and concurs with the demonstrations included in the December 6, 2007, 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-6a, MW-11m, MW16-B, and MW-17B.

Should future or existing ground water sampling results indicate statistically significant changes in the 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 is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. 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 which the Commission, in its discretion, may reduce if by affidavit you demonstrate 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  
309 South Fourth Street  
Room 222  
Columbus, Ohio 43215

If you have any questions concerning this letter, please feel free to contact Phil Farnlacher of Ohio EPA, CDO at (614) 728-3890.

Sincerely,

Isaac Robinson III, Chief  
Central District Office  
for Chris Korleski, Director

c: Christopher Cobel, Eagon & Associates  
Jeff Gibbs, Franklin County Health Dept.  
Cal James, DDAGW/CDO  
CDO/DSIWM File