



State of Ohio Environmental Protection Agency

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Dave Bower
American Landfill
7916 Chapel Street, S.E.
Waynesburg, OH 44688-9700

I certify this to be a true and accurate copy of the official document as filed in the records of the Ohio Environmental Protection Agency.
By: Zona K. Clements Date: 9-13-01

Re: **American Landfill, Stark County**
Ohio Administrative Code (OAC) Rule 3745-27-10(E)(7)(b) Approval

Dear Mr. Bower:

During the September 2000 ground water sampling event for American Landfill, two ground water monitoring wells detected exceedences in monitoring parameters -well AMW-6 for cobalt and well AMW-1 IA for chloride. By correspondence dated January 25, 2001, Earth Sciences Consultants, acting on behalf of American Landfill, submitted a report demonstrating that the exceedences were not a result of a release of contaminates from the landfill.

In accordance with OAC Rule 3745-27-10(E)(7)(b) and Ohio EPA Solid Waste Policy DDAGW-04-03-224, the report adequately demonstrates that the statistically significant increase in total cobalt at well AMW-6 resulted from an error in the statistical evaluation. However, the false statistical trigger indicates that the current statistical method for cobalt at well AMW-6 may not be appropriate. OAC Rule 3745-27-10(C)(7)(f) states: "if necessary, the statistical method shall include procedures to control or correct for seasonal and spatial variability as well as temporal correlation in the data." American Landfill shall re-evaluate the appropriateness of the current statistical method and revise the *Statistical Analysis Plan* accordingly.

In accordance with OAC Rule 3745-27-10(E)(7)(b) and Ohio EPA Solid Waste Policy DDAGW-04-03-224, the report also adequately demonstrates that a source other than the landfill facility caused the chloride exceedance at well AMW-11A. The demonstration identified the chloride source as an oil field pipeline that has documented failures. The demonstration also includes flow path and time-of-travel calculations from the pipeline source to the impacted ground water monitoring well. However, the false statistical trigger indicates that the current statistical method for chloride at well AMW-11A may not be appropriate. As referenced above, American Landfill shall re-evaluate the appropriateness of the current statistical method and revise the *Statistical Analysis Plan* accordingly.

Bob Taft, Governor
Maureen O'Connor, Lieutenant Governor
Christopher Jones, Director

Since the report demonstrates that the exceedences were not a result of a release of contaminants from the landfill, the two monitoring wells should not be in assessment monitoring. Therefore, pursuant to OAC Rule 3745-27-10(E)(7)(b), wells AMW-6 and AMW-11A may return to the detection monitoring program.

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

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 grounds upon which the appeal is based. The appeal must be filed with the commission within 30 days after notice of the director's action. Notice of the filing of the appeal shall be filed with the director within three days after the appeal is filed with the commission. An appeal may be filed with the commission at the following address:

Environmental Review Appeals Commission
236 East Town Street
Room 300
Columbus, Ohio 43215

If you have any technical questions regarding this approval, please contact Doug Dobransky of Ohio EPA's Division of Drinking and Ground Waters at (330) 963-1200. If you have any other general questions concerning the landfill, please contact Scott Winkler of Ohio EPA's Division of Solid and Infectious Waste Management at the same phone number.

Sincerely,



Christopher Jones
Director

cc: Eric Adams, DSIWM, NEDO
Scott Hester, DSIWM, Central
Kirk Norris, Stark County Health Department