



OHIO E.P.A.

DEC -2 2014

ENTERED DIRECTOR'S JOURNAL

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Director

Re: Hoffman Road Sanitary Landfill
Director's Authorization
Approval
Municipal Solid Waste Landfills
Lucas County
MSWL018751

DEC 02 2014

Mr. Dan Pittman
Hoffman Road Landfill
3962 Hoffman Road
Toledo, Ohio 43611

Subject: Ohio Administrative Code (OAC) Rule 3745-27-10(D)(7)(c)(ii) Approval

Dear Mr. Pittman:

On August 1, 2014, the Ohio Environmental Protection Agency (Ohio EPA), Northwest District Office received from Hull & Associates, Inc., on behalf of the City of Toledo, the document *Statistical Report of Groundwater Quality for the City of Toledo Hoffman Road Landfill*, (Report) dated August 2014, cover letter dated August 1, 2014. Pursuant to Ohio Administrative Code (OAC) 3745-27-10(D)(7)(c)(ii) the Report includes, in Appendix C, false positive demonstrations for monitoring wells MW-10, MW-13, MW-14A, MW-15AR, and MW-14B. The initial sampling for the semi-annual sampling event was conducted May 20-22, 2014, confirmation re-sampling was conducted July 22, 2014. In correspondence dated October 8, 2014, Ohio EPA informed the City of Toledo that additional purging, sampling, and analysis information is necessary to confirm the potential false positives for copper, potassium, and zinc at monitoring well MW-14B. Comments concerning the false positive demonstrations for monitoring wells, MW-10, MW-13, MW-14A and MW-15AR has, been sent in separate correspondence.

On October 22, 2014, Ohio EPA, Northwest District Office received from Hull & Associates, Inc., on behalf of the City of Toledo, the document *Results of Investigative Activities and Additional Alternate Source Demonstration for Monitoring Well MW-14B at the City of Toledo-Hoffman Road Landfill*, dated October 22, 2014. Ohio EPA has reviewed the additional alternate source information concerning statistically significant increases in constituent concentrations at monitoring well MW-14B.

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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 from natural variation in ground water quality and request that the director approve reinstatement of the detection monitoring program.

The October 22, 2014, document concluded that the statistically significant changes for copper, potassium, and zinc at monitoring well MW-14B are false positives due to an alternate source (surface water had entered the well).

Ohio EPA has reviewed the applicable information and concurs with this conclusion. Therefore, pursuant to OAC Rule 3745-27-10(D)(7)(c)(ii), I hereby approve continuation of the ground water detection monitoring program for the monitoring well noted above.

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

This approval shall not be construed to release the owner or operator from the obligation to comply with the requirements of any other ground water quality assessment monitoring program being conducted at the Facility.

A detailed account of Ohio EPA's review of the ground water demonstration will be sent to you under separate cover.

You are hereby notified that this action of the Director of Environmental Protection (Director) 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 thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00 made payable to "Treasurer, State of Ohio." The Commission, in its discretion, may reduce the fee if by affidavit it is demonstrated 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.

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An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
77 South High Street, 17th Floor
Columbus, Ohio 43215

If you have any questions concerning this letter, please contact Susan Hardy of Ohio EPA NWDO DMWM at, 419-373-3043.

Sincerely,



Shannon Nabors, Chief
Northwest District Office
For Craig W. Butler, Director

SN/cg

pc: Jodi Vaughan, Toledo-Lucas County Health Department
Karen Okonta, Hull and Associates, Inc.
Mike Reiser, DMWM, NWDO
Mike Beal, DDAGW, NWDO
Ken Brock, DDAGW, NWDO
Lindsay Taliaferro, DDAGW, CO
Habib Kaake, DMWM, NWDO
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