



Mike DeWine, Governor
Jon Husted, Lt. Governor
Laurie A. Stevenson, Director

MAY 31, 2019

Drew Trainer
Port Clinton Landfill
530 North Camp Road
Port Clinton, Ohio 43452

Re: **Port Clinton Landfill Inc
Director's Authorization
Approval
Municipal Solid Waste Landfills
Ottawa County
MSWL018780**

**Subject: Port Clinton Landfill, Ottawa County
Ohio Administration Code (OAC) Rule 3745-27-10(D)(3) Approval**

Dear Mr. Trainer:

Ohio EPA MAY 31 '19
Entered Directors Journal

On March 15, 2019, the Ohio Environmental Protection Agency (Ohio EPA), Division of Materials and Waste Management (DMWM), Northwest District Office (NWDO) received a document titled *2018 Groundwater Monitoring Network Adequacy Evaluation, Summary of Groundwater Monitoring Network Maintenance Activities, Annual Leachate Grab Sample Analytical Results, and Alternate Parameter List*, dated March 13, 2019, for the Port Clinton Landfill (Facility) located in Ottawa County. This document was submitted by Civil & Environmental Consultants (CEC) on behalf of Republic Services, Inc. (Republic) and requested to add selenium to the list of statistical analysis parameters (antimony, cadmium, cobalt, copper, lead, and vanadium) that were replaced with statistical analysis of alkalinity by the September 6, 2007 Alternate Parameter List (APL) approval.

In accordance with the September 6, 2007 APL approval, the APL shall be evaluated at least annually, using leachate sample data collected to satisfy requirements for the Facility's annual reports, to determine if the approved alternate monitoring list continues to be adequate to identify potential inorganic releases from the landfill into ground water. Selenium was recently detected in two consecutive leachate samples, collected on June 1, 2017, and May 30, 2018.

Per the conditions of the September 6, 2007 APL approval, selenium shall be returned to the detection monitoring parameter list starting with the Spring 2019 event. However, CEC has presented evidence to indicate that alkalinity analysis provides a more accurate indication of inorganic release into ground water than selenium detection analysis does, as selenium has never been detected above the Practical Quantitation Limit (PQL) in a ground water sample and has only been detected in leachate above the PQL four times since the APL approval in 2007.

Pursuant to OAC Rule 3745-27-10(D)(3), the owner or operator of a sanitary landfill facility may propose in writing that an alternative list of inorganic indicator parameters be used to meet paragraph (D)(5) of this rule in lieu of some or all of the inorganic parameters listed in appendix I to this rule. The director shall approve the alternative inorganic

indicator parameters if the alternative list will provide a reliable indication of inorganic releases from the sanitary landfill facility to the ground water. Upon approval by the director or the director's authorized representative, the owner or operator shall use the alternative list.

Ohio EPA has reviewed the March 13, 2019 document and concurs with the request that selenium be added to the list of statistical analysis parameters that were previously replaced with statistical analysis of alkalinity by the September 6, 2007 APL approval. Ohio EPA's review determined that the owner or operator has provided sufficient evidence to demonstrate that alkalinity analysis will provide a reliable indication of inorganic releases from the sanitary landfill facility to the ground water and meets the requirements of OAC 3745-27-10(D)(3) in the document. Therefore, Ohio EPA approves this request pursuant to OAC 3745-27-10(D)(3) at the Port Clinton Landfill.

The following table summarizes the revised schedule for ground water sample analysis and statistical evaluations for detection monitoring of the wells:

Constituents	Upper Aquifer System			Significant Zone of Saturation		
	Semiannual Parameters	Annual Parameters	Statistical Parameters	Semiannual Parameters	Annual Parameters	Statistical Parameters
Antimony (1)		X			X	
Arsenic (2)	X	X	X		X	
Barium (3)	X	X	X		X	
Beryllium (4)						
Cadmium (5)		X			X	
Chromium (6)	X	X	X		X	
Cobalt (7)		X			X	
Copper (8)		X			X	
Lead (9)		X			X	
Nickel (10)	X	X	X		X	
Selenium (11)		X			X	
Silver (12)						
Thallium (13)						
Vanadium (15)		X			X	
Zinc (15)	X	X	X		X	

Constituents	Upper Aquifer System			Significant Zone of Saturation		
	Semiannual Parameters	Annual Parameters	Statistical Parameters	Semiannual Parameters	Annual Parameters	Statistical Parameters
VOC (16-62)	X	X	X	X	X	X
Ammonia (63)	X	X	X	X	X	X
Chloride (64)	X	X	X	X	X	X
Sodium (65)	X	X	X	X	X	X
Potassium (66)		X		X	X	X
Temperature (67)		X		X	X	
pH (68)	X	X		X	X	
Spec. Cond. (69)	X	X		X	X	
Total Diss. Solids (70)		X			X	
Total Alkalinity (71)	X	X	X		X	
Nitrate-Nitrite (72)		X			X	
Sulfate (73)		X			X	
Magnesium (74)		X			X	
Calcium (75)		X			X	
Turbidity (76)		X			X	
Iron (77)		X			X	
Magnesium (78)		X			X	

Per the conditions of the September 6, 2007 APL, the alternate parameter list shall be evaluated, at least annually, using leachate sample data collected to satisfy requirements for the facility's annual reports, to determine if the approved alternate monitoring list continues to be adequate to identify potential releases from the landfill into the ground water. If this evaluation determines that the existing approved alternate monitoring list is inadequate, it should be revised and re-approved accordingly. Additionally, Ohio EPA reserves the right to reinstate some, or all, of the replaced and deleted parameters.

You are hereby notified that this action of the 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.

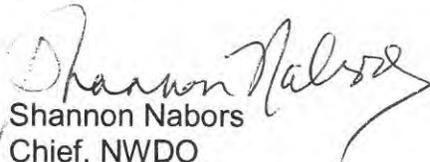
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The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00 made payable to "Treasurer, State of Ohio." The Commission, in its discretion, may 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. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
30 East Broad Street, 4th Floor
Columbus, Ohio 43215

A detailed account of Ohio EPA's review of the ground water demonstration will be sent to you in separate correspondence. If you have any questions concerning this letter, please contact Kilynn Sandberg DMWM, NWDO at (419) 373-3160.

Sincerely,


Shannon Nabors
Chief, NWDO
For Laurie A. Stevenson
Director, Ohio EPA

/bnb

ec: Susan Hardy, DMWM-NWDO
Mike Reiser, DMWM-NWDO
Ken Brock, DMWM-NWDO
Jeremy Carroll, DMWM-CO
Dawn Wright, Republic Services, Inc.
Tim Wasserman, OSS-SWMD

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