



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

NOVEMBER 19, 2019

Mr. Allen Bradburn
Republic Services
5092 Aber Road
Williamsburg, OH 45176

**Re: CLD Landfill
Director's Authorization
Approval
Municipal Solid Waste Landfills
Mahoning County
MSWL019386**

**Subject: CLD Landfill, Mahoning County
Ohio Administrative Code (OAC) Rule 3745-27-10(C)(7)(g) Approval**

Dear Mr. Bradburn:

Ohio EPA NOV 19 '19
Entered Directors Journal

On July 19, 2019, the Ohio Environmental Protection Agency (Ohio EPA), Northeast District Office (NEDO), Division of Materials and Waste Management (DMWM) received a background update request with the same date titled "Statistical Analysis Program for Ground-Water Quality Monitoring-Revision 4, OAC 3745-27-10(C)(7)(g) Request to Incorporate Statistically Significant Results into the Proposed Background Period, County Land Development (CLD)/Lewis Landfill, Mahoning County, Ohio." The document was submitted in accordance with Ohio Administrative Code (OAC) Rule 3745-27-10(C)(7)(g) by Eagon & Associates, Inc. on behalf of CLD Landfill located at 9960 South Range Road, Salem, Ohio 44460.

Pursuant to OAC Rule 3745-27-10(C)(7)(g), background data can be added only in blocks of data resulting from the analysis of four or more statistically independent samples after the data have been statistically compared to the current background data and no statistical differences are detected, unless another method is deemed acceptable to the director.

CLD Landfill has proposed using the following statistically significant data from detection monitoring wells MW-2R (chloride); MW-7DA (ammonia, chloride, potassium); MW-8D (chloride); MW-18C (chloride and potassium); MW-107A (sodium); MW-121C (chloride, nickel, sodium); and P-13B (chloride and potassium) as part of the facility's background data. These data are generally very low in concentration, were collected during a time period of sampling methodology change (volumetric to low flow), and have been allowed to remain in detection monitoring through various alternate source demonstrations.

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<u>Well Number</u>	<u>Parameter</u>	<u>Date</u>	<u>Result (mg/L)</u>
MW-2R	Chloride	12/2014	9.0
MW-2R	Chloride	04/2015	8.4
MW-2R	Chloride	06/2015	8.9
MW-2R	Chloride	10/2015	12.0
MW-2R	Chloride	12/2015	10.0
MW-2R	Chloride	05/2016	7.8
MW-2R	Chloride	12/2016	12.3
MW-2R	Chloride	06/2017	12.4
MW-2R	Chloride	11/2017	12.6
MW-2R	Chloride	06/2018	12.6
MW-2R	Chloride	12/2018	14.0
MW-7DA	Ammonia	10/2014	0.51
MW-7DA	Ammonia	04/2015	0.55
MW-7DA	Ammonia	05/2016	0.53
MW-7DA	Ammonia	12/2016	0.59
MW-7DA	Ammonia	01/2017	0.54
MW-7DA	Ammonia	06/2018	0.53
MW-7DA	Ammonia	12/2018	0.54
MW-7DA	Chloride	10/2014	58.0
MW-7DA	Chloride	04/2015	58.5
MW-7DA	Chloride	06/2015	56.6
MW-7DA	Chloride	10/2015	44.8
MW-7DA	Chloride	12/2015	56.3
MW-7DA	Chloride	05/2016	56.2
MW-7DA	Chloride	12/2016	50.5
MW-7DA	Chloride	01/2017	51.6
MW-7DA	Chloride	06/2017	52.5
MW-7DA	Chloride	11/2017	52.9
MW-7DA	Chloride	06/2018	49.3
MW-7DA	Chloride	07/2018	45.5
MW-7DA	Chloride	12/2018	45.7
MW-7DA	Potassium	10/2014	5.40
MW-7DA	Potassium	04/2015	4.66
MW-7DA	Potassium	06/2015	4.90
MW-7DA	Potassium	05/2016	5.12
MW-7DA	Potassium	12/2016	4.81
MW-7DA	Potassium	01/2017	4.71
MW-7DA	Potassium	06/2017	4.99
MW-7DA	Potassium	11/2017	4.87
MW-7DA	Potassium	06/2018	4.78
MW-7DA	Potassium	12/2018	4.83

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MW-8D	Chloride	05/2014	2.8
MW-8D	Chloride	10/2015	3.3
MW-8D	Chloride	12/2015	3.2
MW-8D	Chloride	05/2016	2.8
MW-8D	Chloride	12/2016	2.4
MW-8D	Chloride	01/2017	3.0
MW-8D	Chloride	06/2017	3.0
MW-8D	Chloride	06/2018	2.6
MW-8D	Chloride	07/2018	4.4
MW-18C	Chloride	05/2014	45.0
MW-18C	Chloride	07/2014	30.0
MW-18C	Chloride	10/2014	36.0
MW-18C	Chloride	04/2015	50.3
MW-18C	Chloride	06/2015	32.8
MW-18C	Chloride	10/2015	31.8
MW-18C	Chloride	11/2017	49.4
MW-18C	Chloride	06/2018	30.2
MW-18C	Potassium	05/2014	6.8
MW-18C	Potassium	10/2014	6.8
MW-107A	Sodium	11/2012	11
MW-107A	Sodium	01/2013	11
MW-107A	Sodium	11/2013	11
MW-107A	Sodium	12/2013	11
MW-107A	Sodium	10/2014	11
MW-121C	Chloride	05/2012	40
MW-121C	Nickel	05/2013	0.0065
MW-121C	Nickel	07/2013	0.0087
MW-121C	Nickel	05/2014	0.0079
MW-121C	Nickel	07/2014	0.0087
MW-121C	Sodium	05/2012	24
MW-121C	Sodium	06/2012	34
P-13B	Chloride	06/2018	3.5
P-13B	Chloride	07/2018	3.3
P-13B	Potassium	05/2012	9.6
P-13B	Potassium	06/2012	8.9
P-13B	Potassium	10/2014	9.8

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Ohio EPA has reviewed the applicable information and concurs with the addition of the above data to existing background data. Therefore, pursuant to OAC Rule 3745-27-10(C)(7)(g), the owner or operator is hereby authorized to incorporate the above data in the facility's background data.

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. 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

If you have any questions concerning this letter, please contact Mark Kroenke of Ohio EPA, NEDO at (330) 963-1225.

Sincerely,



Kurt M. Princic
Chief, Northeast District Office
for Laurie A. Stevenson, Director, Ohio EPA

KMP:MK

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