



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

JANUARY 23, 2020

Mr. Richard Heier  
Norton Environmental  
6055 Rockside Woods Blvd  
Independence, OH 44131

**Re: Royalton Rd Sanitary Landfill  
Director's Authorization  
Approval  
Municipal Solid Waste Landfills  
Cuyahoga County  
MSWL018768**

**Subject: Royalton Road Landfill, Cuyahoga County  
Ohio Administrative Code (OAC) Rule 3745-27-10(F)  
Corrective Measures Program Approval**

Dear Mr. Heier:

Ohio EPA JAN 23 '20  
Entered Directors Journal

On November 8, 2019, the Ohio Environmental Protection Agency (Ohio EPA), Division of Materials and Waste Management (DMWM), Northeast District Office (NEDO) received a document titled, *Corrective Measures Plan for the Significant Zone of Saturation Royalton Road Sanitary Landfill Cuyahoga County, Ohio*, dated November 2019, for the Royalton Road Landfill (Facility) located in Cuyahoga County. The document was submitted by Eagon and Associates, on behalf of Norton Construction Company, DBA Norton Environmental.

*Pursuant to Ohio Administrative Code (OAC) Rule 3745-27-10(F)(1), upon determining in accordance with paragraph (E) of this rule that waste-derived contaminants have been detected in the ground water the owner or operator shall implement a corrective measures program plan capable of evaluating all practicable ground water remediation procedures, attaining the concentration level for waste-derived contaminants detected in the ground water, controlling the source of the release, identifying specific ground water monitoring requirements to monitor the effectiveness of the corrective measures, and eliminating further releases. The owner or operator shall implement the corrective measures program in accordance with the corrective measures plan and this rule.*

OAC Rule 3745-27-10(F)(2) requires the corrective measures plan (CMP) contain a ground water corrective measures monitoring plan and OAC Rule 3745-27-10(F)(7) requires that the CMP propose a ground water remediation standard (GWRS) for each waste-derived constituent detected in the ground water. The CMP submitted November 8, 2019, complies with the requirements contained in paragraphs (F)(2), (F)(3), and (F)(7) of OAC Rule 3745-27-10, including the requirement to be protective of human health and safety and the environment. Specifically, the CMP includes provisions for semiannual sampling and analysis of ground water and a concentration level (GWRS) for

each waste-derived constituent detected in ground water. Surface water will be monitored, and the results will be compared to water quality standards.

The following table presents the waste-derived constituents with their associated GWRS and the source of each standard.

**Royalton Road Landfill  
Ground Water Remediation Standards (GWRS)**

<b>Waste Derived Constituent</b>	<b>GWRS (mg/L)</b>	<b>Basis for GWRS</b>
<b>Inorganic Parameters</b>		
Alkalinity	1042	2x Highest Concentration in Bkg Wells
Ammonia	30	HAL
Arsenic	0.0648	2x Highest Concentration in Bkg Wells
Barium	2	MCL
Chloride	250	SMCL
Chromium	0.1	MCL
Cobalt	0.005	PQL
Copper	1.3	Action Level
Iron	17.6	2x Highest Concentration in Bkg Wells
Lead	0.015	Action Level
Manganese	0.962	2x Highest Concentration in Bkg Wells
Nickel	0.100	HAL
Potassium	25.8	2x Highest Concentration in Bkg Wells
Sodium	262	2x Highest Concentration in Bkg Wells
Sulfide	0.1	PQL
Total Dissolved Solids	6720	2x Highest Concentration in Bkg Wells
Vanadium	0.005	PQL
<b>Volatile Organic Compounds (VOCs)</b>		
Acetone	0.01	PQL
Benzene	0.005	MCL
Chlorobenzene	0.100	MCL
Chloroethane	0.001	PQL
1,4-Dichlorobenzene	0.075	MCL
1,1-Dichloroethane	0.001	PQL
Cis-1,2-Dichloroethene	0.07	MCL
<b>Note:</b> Action Level = The concentration of a contaminant which, if exceeded, triggers treatment or other requirements which a water system must follow HAL = Health Advisory Level      PQL = Laboratory Practical Quantitation Limit MCL = Maximum Contaminant Level      SMCL = Secondary Maximum Contaminant Level		

The CMP describes a quantitative source control evaluation process by which ground water monitoring well data is statistically analyzed and evaluates the following potential corrective measures:

- Alternative 1: Monitored Natural Attenuation
- Alternative 2: Capping and Leachate Management System
- Alternative 3: Extend Leachate Management System
- Alternative 4: Phytoremediation

There is currently no risk to human health or the environment outside of the property since the extent of the impacted area is within the property boundaries.

Based on the information contained in the Corrective Measures Plan submitted pursuant to OAC Rule 3745-27-10(F)(2), I have selected the corrective measure described in the November 2019 CMP. The Royalton Road Landfill shall implement the CMP corrective measures alternatives 1, 2 and 3.

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 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, 4<sup>th</sup> Floor  
Columbus, Ohio 43215

If you have any questions concerning this action, please contact Paul Parrish, DMWM, NEDO at (330) 963-1125.

Sincerely,

A handwritten signature in black ink that reads "Laurie A. Stevenson". The signature is written in a cursive, flowing style.

Laurie A. Stevenson  
Director

LAS:PMP

cc: Lynn Sowers, Ohio EPA, DMWM, NEDO  
Eric Adams, Ohio EPA, DMWM, NEDO  
Josh Adams, Ohio EPA, DMWM, NEDO  
Mark Kroenke, Ohio EPA, DMWM, NEDO  
Paul Parrish, Ohio EPA, DMWM, NEDO  
Jeremy Carroll, Ohio EPA, DMWM, CO  
Scott Sutliff, Ohio EPA, DMWM, CO  
Dane Tussel, Cuyahoga County Board of Health