



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

July 9, 2020

Mr. James Hamann
American Landfill
7916 Chapel Street
Waynesburg, OH 44688

RE: American Landfill
Director's Authorization
Approval
Municipal Solid Waste Landfills
Stark County
MSWL018809

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

Dear Mr. Hamann:

On April 22, 2020, the Ohio Environmental Protection Agency (Ohio EPA), Northeast District Office (NEDO), Division of Materials and Waste Management (DMWM) received a request to update background with statistically different data included in a document, dated April 21, 2020, titled "Statistical Analysis Program for Ground Water Monitoring – Revision 12." On May 21, 2020, Ohio EPA, NEDO DMWM received addendum, dated May 21, 2020, modifying the aforementioned request and titled "Statistical Analysis Program for Ground Water Monitoring-Revision 12, Revised Table 4." The two documents were submitted in accordance with Ohio Administrative Code (OAC) Rule 3745-27-10(C)(7)(g) by Eagon & Associates (Eagon), on behalf of American Landfill (facility), and requested to include statistically different data in updating data sets representing the background water quality for a number of the facility's detection wells and single corrective measures (LKC-8) well located at 7916 Chapel Road, Waynesburg, Stark County, Ohio.

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.

In the submitted documents, the facility has proposed including 112 data from 24 wells that were previously shown to represent a statistically significant increase (SSI) and/or an outlier in the proposed data sets as part of the facility's background data. The request includes data from 12 Putnam Hill Limestone/Brookville Coal (PHL/BC) Uppermost Aquifer Systems (UAS) wells: PHL/BC-1, PHL/BC-4, PHL/BC-5, PHL/BC-10, PHL/BC-11, PHL/BC-13, PHL/BC-15, PHL/BC-16, PHL/BC-17, PHL/BC-21, PHL/BC-22, and PHL/BC-25; four Lower Kittanning Coal/Mine Spoil (LKC/MS) Significant Zone of

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Saturation (SZS) wells: LKC-7, LKC-8, LKC-10, and AMW-16; and eight Clarion Shale - Sandstone Facies (Sandstone) SZS wells: AMW-2A, AMW-3, AMW-4, AMW-10, AMW-11A, AMW-12A, AMW-15, and AMW-19. Upon review, Ohio EPA found the 112 requested data to meet requirements for Director's Approval in accordance with the rules.

<u>Well Number</u>	<u>Parameter</u>	<u>Date</u>	<u>Result (mg/L)</u>
AMW-2A	chloride	10-08-18	27.0
AMW-2A	chloride	04-16-19	32.2
AMW-2A	chloride	10-15-19	32.9
AMW-3	chloride	04-16-18	55.0
AMW-3	chloride	10-08-18	58.0
AMW-3	chloride	04-16-19	60.6
AMW-3	chloride	10-15-19	58.7
AMW-4	chloride	04-16-18	326
AMW-4	chloride	10-08-18	292
AMW-4	chloride	11-26-18	282
AMW-4	chloride	04-16-19	295
AMW-4	chloride	05-29-19	279
AMW-4	chloride	10-15-19	279
AMW-4	sodium	10-08-18	89.7
AMW-4	sodium	11-26-18	88.2
AMW-4	sodium	04-16-19	78.0
AMW-4	sodium	05-29-19	83.8
AMW-4	sodium	10-15-19	79.4
AMW-10	ammonia	04-21-09	0.12
AMW-11A	potassium	10-09-96	10.0
AMW-11A	potassium	04-20-10	9.3
AMW-12A	sodium	01-12-96	27.0
AMW-12A	sodium	06-12-03	23.0
AMW-15	ammonia	10-08-18	0.80
AMW-15	ammonia	11-26-18	0.91
AMW-15	ammonia	04-16-19	0.98
AMW-15	ammonia	10-15-19	0.96
AMW-15	chloride	04-16-18	1210
AMW-15	chloride	05-24-18	1310
AMW-15	chloride	10-08-18	1460
AMW-15	chloride	04-16-19	1620
AMW-15	chloride	10-15-19	1670
AMW-15	potassium	10-08-18	16.0
AMW-15	potassium	11-26-18	15.6
AMW-15	potassium	04-16-19	17.3
AMW-15	potassium	10-15-19	15.3
AMW-15	sodium	10-15-19	291
AMW-16	sodium	10-08-18	97.1
AMW-16	sodium	10-15-19	94.2

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<u>Well Number</u>	<u>Parameter</u>	<u>Date</u>	<u>Result (mg/L)</u>
AMW-19	chloride	10-10-17	61.0
AMW-19	chloride	04-16-18	71.0
AMW-19	chloride	05-24-18	68.0
AMW-19	chloride	10-08-18	69.0
AMW-19	chloride	04-16-19	74.1
AMW-19	chloride	10-15-19	74.1
PHL/BC-1	arsenic	10-19-04	0.0033
PHL/BC-1	arsenic	11-03-05	0.0047
PHL/BC-1	arsenic	10-11-06	0.0021
PHL/BC-4	ammonia	04-16-19	1.29
PHL/BC-4	ammonia	10-15-19	1.36
PHL/BC-4	benzene	06-02-14	0.0011
PHL/BC-4	benzene	04-13-15	0.0010
PHL/BC-4	benzene	05-20-15	0.0012
PHL/BC-4	benzene	04-11-16	0.0012
PHL/BC-4	benzene	05-18-16	0.0010
PHL/BC-4	benzene	09-19-16	0.0010
PHL/BC-4	benzene	04-10-17	0.0021
PHL/BC-4	benzene	04-16-18	0.0016
PHL/BC-4	benzene	05-24-18	0.0010
PHL/BC-5	barium	10-08-18	0.115
PHL/BC-5	barium	11-26-18	0.121
PHL/BC-5	barium	10-15-19	0.135
PHL/BC-10	chloride	10-08-18	11.0
PHL/BC-10	chloride	11-26-18	11.0
PHL/BC-10	chloride	04-16-19	10.0
PHL/BC-10	chloride	05-29-19	12.0
PHL/BC-10	chloride	10-15-19	11.3
PHL/BC-11	arsenic	10-20-04	0.0030
PHL/BC-11	arsenic	06-21-05	0.0022
PHL/BC-11	arsenic	11-03-05	0.0042
PHL/BC-13	chloride	04-16-18	632
PHL/BC-13	chloride	10-08-18	745
PHL/BC-13	chloride	04-16-19	777
PHL/BC-13	chloride	10-15-19	845
PHL/BC-13	potassium	10-15-19	12.5
PHL/BC-13	sodium	10-08-18	188
PHL/BC-13	sodium	11-26-18	189
PHL/BC-13	sodium	04-16-19	196
PHL/BC-13	sodium	10-15-19	200
PHL/BC-15	barium	10-08-18	0.308
PHL/BC-15	barium	04-16-19	0.331
PHL/BC-15	barium	10-15-19	0.312

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<u>Well Number</u>	<u>Parameter</u>	<u>Date</u>	<u>Result (mg/L)</u>
PHL/BC-15	chloride	10-15-19	16.9
PHL/BC-16	ammonia	04-16-18	2.72
PHL/BC-16	ammonia	05-24-18	2.48
PHL/BC-16	ammonia	10-08-18	2.55
PHL/BC-16	ammonia	04-16-19	2.43
PHL/BC-16	chloride	04-16-18	155
PHL/BC-16	chloride	05-24-18	153
PHL/BC-16	chloride	10-08-18	153
PHL/BC-16	chloride	04-16-19	163
PHL/BC-16	chloride	10-15-19	148
PHL/BC-16	potassium	04-16-18	11.5
PHL/BC-16	potassium	05-24-18	11.6
PHL/BC-16	potassium	10-08-18	11.5
PHL/BC-16	potassium	04-16-19	11.0
PHL/BC-16	potassium	10-15-19	10.9
PHL/BC-16	selenium	04-20-10	0.0014
PHL/BC-17	antimony	10-15-19	0.001
PHL/BC-17	selenium	04-19-10	0.0014
PHL/BC-21	beryllium	04-16-19	0.001
PHL/BC-21	beryllium	10-15-19	0.0013
PHL/BC-21	beryllium	12-03-19	0.001
PHL/BC-21	vanadium	10-08-19	0.006
PHL/BC-22	chloride	04-16-19	36.7
PHL/BC-25	barium	04-16-19	0.083
PHL/BC-25	barium	10-15-19	0.09
PHL/BC-25	zinc	10-08-18	0.017
LKC-7	potassium	10-28-08	9.4
LKC-8	ammonia	11-03-05	0.35
LKC-8	ammonia	04-29-08	0.24
LKC-10	potassium	04-15-15	3.3

Ohio EPA has reviewed the applicable information and concurs with the addition of the above 112 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

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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 Al Muller of Ohio EPA, NEDO at (330) 963-1211.

Sincerely,



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

KMP/AM/ams

ec: Jarnal Singh, Ohio EPA, NEDO, DMWM
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