OhioEPA

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

MAR 2 6 2015

Mohammad Ali
Waste Management
American Landfill
7916 Chapel Street, S.E.
Waynesburg, OH 44688-9700

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(D)(7)(c)(ii) Approval

Dear Mr. Ali:

On February 10, 2015, the Ohio Environmental Protection Agency (Ohio EPA), Division of Materials and Waste Management (DMWM), Northeast District Office (NEDO), received a document titled *"2014 Second Semiannual Groundwater Monitoring OAC Rule 3745-27-10(D)(7)(c)(ii) Demonstration,"* dated February 4, 2015, for American Landfill (Facility) located in Stark County. This document was submitted by Eagon and Associates, on behalf of the Facility, and contains the ground water sampling results and the statistical analysis from the October 20, 2014, ground water sampling event at the Facility.

According to the document, analysis of the ground water detection monitoring data indicated that the following statistically significant changes were detected: Potassium in monitoring well UC2; Chloride and Sodium in monitoring well AMW-4; Chloride in monitoring well LKC-2A; Ammonia and Barium in monitoring well PHL/BC-4; Barium in monitoring well PHL/BC-5; Barium in monitoring well PHL/BC-12; Chloride in monitoring well PHL/BC-16; Chloride in monitoring well PHL/BC-17; and Barium in monitoring well PHL/BC-22.

Verification sampling was performed on November 24, 2014. Analysis of the re-sampling data demonstrated that the statistically significant change for Potassium in monitoring well UC2 was a false positive. Therefore, monitoring well UC2 was automatically returned to the detection monitoring program pursuant to OAC Rule 3745-27-10(D)(7)(c)(i). Ohio EPA acknowledges the return of this well to the detection monitoring program. However, the re-sampling data verified the statistically significant changes for Chloride and Sodium in monitoring well AMW-4; Chloride in monitoring well LKC-2A; Amonia and Barium in monitoring well PHL/BC-4; Barium in monitoring well PHL/BC-5; Barium in monitoring well PHL/BC-12; Chloride in monitoring well PHL/BC-16; Chloride in monitoring well PHL/BC-17; and Barium in monitoring well PHL/BC-22.

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 natural variation in ground water quality. A report documenting this demonstration must be submitted to and approved by Ohio EPA. If the owner or operator does not obtain approval to continue detection monitoring not later than two hundred ten (210) days from initial sampling, the owner or operator is required to comply with the provisions of OAC Rule 3745-27-10(E) for ground water quality assessment monitoring.

The February 4, 2015, document concluded that the statistically significant changes for Chloride and Sodium in monitoring well AMW-4; Chloride in monitoring well LKC-2A; Amonia and Barium in monitoring well PHL/BC-4; Barium in monitoring well PHL/BC-5; Barium in monitoring well PHL/BC-12; Chloride in monitoring well PHL/BC-16; Chloride in monitoring well PHL/BC-17; and Barium in monitoring well PHL/BC-22 were due to natural and spatial variability in groundwater quality within the Uppermost Aquifer System (UAS) and the Significant Zone of Saturation (SZS) or an alternative source and not as a result of impact from the landfill. Monitoring wells AMW-4, LKC-2A, PHL/BC-4, PHL/BC-5, PHL/BC-12, PHL/BC-16, PHL/BC-17, and PHL/BC-22 were initially sampled on October 20, 2014.

Ohio EPA has reviewed the applicable information and concurs with the demonstration included in the February 4, 2015, document. Therefore, pursuant to OAC Rule 3745-27-10(D)(7)(c)(ii), the owner or operator is hereby authorized to continue the detection monitoring program at the Facility for monitoring wells wells AMW-4, LKC-2A, PHL/BC-4, PHL/BC-5, PHL/BC-12, PHL/BC-16, PHL/BC-17, and PHL/BC-22.

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 assessment monitoring in accordance with OAC Rule 3745-27-10(E) or obtain approval to remain in the detection monitoring program.

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
77 South High St., 17th Floor
Columbus, Ohio 43215

If you have any questions concerning this action, please contact Karen Naples, DMWM, NEDO at 330-963-1244.

Sincerely,

Kurt M. Princic, Chief
Northeast District Office
for Craig W. Butler, Director

KMP:KN:cla

cc: Lynn Sowers, Ohio EPA, NEDO, DMWM
       Paul DePasquale, Stark County Health Department