



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

OHIO E.P.A.

APR 29 2015

ENTERED DIRECTOR'S JOURNAL

APR 29 2015

Mr. Richard Hughes
Millennium Inorganic Chemicals, Inc.
2426 Middle Road
Ashtabula, Ohio 44004

RE: Millennium Ashtabula Landfill
Director's Authorization
Approval
Industrial Solid Waste Landfills
Ashtabula County
ISWL018450

**Re: Millennium Ashtabula Landfill, Ashtabula County
Ohio Administrative Code (OAC) Rule 3745-30-08(D)(9)(b) Approval**

Dear Mr. Hughes:

On February 19, 2015, the Ohio Environmental Protection Agency (Ohio EPA), Division of Materials and Waste Management (DMWM), Northeast District Office (NEDO) received a document titled "Alternative Source Demonstration," dated February 12, 2015, for the (Facility) located in Ashtabula County. This document was submitted by TM Engineering, Inc. on behalf of Millennium Ashtabula Landfill.

According to the document, analysis of the ground water detection monitoring data indicated that the following statistically significant changes were detected for two consecutive semi-annual statistical determination periods in 2014: sodium in monitoring well MW2-1; ammonia in monitoring well MW2-4.

Pursuant to OAC Rule 3745-30-08(D)(9)(b), the owner or operator may demonstrate that a source other than the landfill facility is the cause of the contamination or that the statistically significant increase results from error in the sampling, analysis, or statistical evaluation, or from natural variation in ground water quality.

The February 12, 2015, document concluded that the statistically significant changes for sodium at monitoring well MW2-1 and ammonia at monitoring well MW2-4 were due to natural variation in ground water quality, and not as a result of impact from the landfill.

Ohio EPA has reviewed the applicable information and concurs with the demonstration included in the February 12, 2015, document. Therefore, pursuant to OAC Rule

MILLENNIUM ASHTABULA LANDFILL
DIRECTOR'S AUTHORIZATION
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3745-30-08(D)(9)(b), the owner or operator is hereby authorized to continue the detection monitoring program at the Facility for monitoring wells MW2-1 and MW2-4.

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 3745-30-08(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 Street, 17th Floor
Columbus, Ohio 43215

If you have any questions concerning this letter, please contact Colum McKenna of Ohio EPA, NEDO at (330) 963-1268.

Sincerely,



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

KMP:KS:cla

cc: Jarnal Singh, Ohio EPA, NEDO, DMWM
Scott Hester, Ohio EPA, Central Office, DMWM
Randy Barnes, Ashtabula County Health Department