



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

OHIO E.P.A.

MAY 21 2015

ENTERED DIRECTOR'S JOURNAL

**MAY 21 2015**

Amy C. Lawson, Project Coordinator  
 Portsmouth/Paducah Project Office  
 U.S. Department of Energy  
 Post Office Box 700  
 Piketon, Ohio 45661

Re: DOE X-749 A Ldf  
 Director's Authorization  
 Approval  
 Industrial Solid Waste Landfills  
 Pike County  
 ISWL018414

Joel Bradburne, Site Lead  
 Portsmouth/Paducah Project Office  
 US Department of Energy  
 Post Office Box 700  
 Piketon, Ohio 45661

**Subject: DOE X-749A Landfill, Pike County  
 Ohio Administrative Code (OAC) Rule 3745-30-08(D)(13) Approval**

Dear Ms. Lawson and Mr. Bradburne:

On April 22, 2015, the Ohio Environmental Protection Agency (Ohio EPA), Division of Materials & Waste Management (DMWM), Southeast District Office (SEDO), received a document titled "*Justification for Return to Detection Monitoring for the X-749A Landfill at the Portsmouth Gaseous Diffusion Plant,*" for the Department of Energy (DOE) X-49A industrial solid waste landfill (Facility) located in Pike County. This document was submitted by DOE, on behalf of the Facility, and contains a request pursuant to Ohio Administrative Code (OAC) Rule 3745-30-08(D)(13) to allow ground water monitoring well X749A-17G at the Facility to return to the detection monitoring program.

Pursuant to OAC Rule 3745-30-08(D)(13), If the owner or operator determines, based on the results of the sampling required by paragraph (D)(10), (D)(11), or (D)(12) of this rule, that there has not been an increase above background levels of waste-derived constituents at any monitoring well down gradient of the facility, then the owner or operator shall request that the director approve reinstatement of the detection monitoring program described in paragraphs (C) and (D)(1) to (D)(8) of this rule. Until the director or his authorized representative approves reinstatement of the detection monitoring program, the owner or operator shall continue to comply with paragraphs (D)(10) to (D)(12) and (E) of this rule.

According to the April 22, 2015 document, statistical exceedances for iron were detected in monitoring well X749A-17G during the second and fourth quarters of 2014, with values of 2500 ug/L and 3700 ug/L, respectively. DOE's attempt to change the statistical analysis method from intra-well to inter-well analysis to explain the statistical

exceedances is not an acceptable demonstration. However, the December 17, 2014 resampling iron value of 380 ug/L in monitoring well X749A-17G does provide an adequate demonstration that the previous values were the result of natural variation. Ohio EPA has reviewed the applicable information and concurs with the demonstration. Therefore, pursuant to OAC Rule 3745-27-08(D)(13), the owner or operator is hereby authorized to reinstate the detection monitoring program at the Facility for monitoring well X749A-17G.

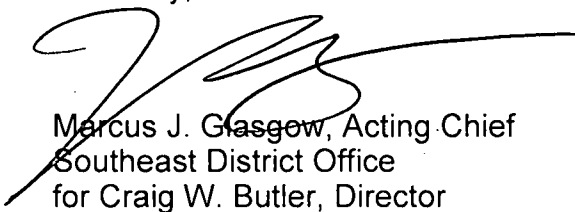
Should future or existing ground water sampling results indicate statistically significant changes in ground water monitoring parameters, the owner or operator will be required to either enter into assessment monitoring in accordance with OAC Rule 3745-30-08(E) or obtain approval to remain in the detection monitoring program.

You are hereby notified that this action of the Director of Ohio EPA (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  
77 South High St., 17<sup>th</sup> Floor  
Columbus, Ohio 43215

If you have any questions concerning this letter, please contact Daniel Bergert of Ohio EPA, DMWM, SEDO at (740)380-5438.

Sincerely,



Marcus J. Glasgow, Acting Chief  
Southeast District Office  
for Craig W. Butler, Director

cc: Rich Fox, DMWM-SEDO  
Scott Hester, DMWM-CO  
Matt Brewster, Pike County General Health District  
Doug Snyder, DDAGW-SEDO

MG/DB/mr