



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

JUN 23 2015

ENTERED DIRECTOR'S JOURNAL

JUN 23 2015

Mr. Peter Lucas, P.E.
Waste Management
2460 South Gettysburg Road
Dayton, Ohio 45417

Re: Pinnacle Road Landfill
Director's Authorization
Approval
Municipal Solid Waste Landfills
Montgomery County
MSWL019951

**Subject: Pinnacle Road Landfill, Montgomery County
Selection of Corrective Measures**

Dear Mr. Lucas:

On September 18, 2014, the Ohio Environmental Protection Agency (Ohio EPA), Division of Materials and Waste Management (DMWM), Southwest District Office (SWDO) received a request titled Ground-Water Corrective Measures Plan (CMP), Pinnacle Road Recycling and Disposal Facility, Montgomery County, Ohio, (the document was dated May 2014) for Pinnacle Road Landfill (Facility) located in Montgomery County. The request was submitted by Eagon & Associates, Inc. on behalf of Waste Management of Ohio. Page revisions were received on November 19, 2014; March 30, 2015; and May 7, 2015, and incorporated into the document to address Ohio Administrative Code (OAC) rule 3745-27-10(F).

The Facility is a closed municipal solid waste landfill and is currently in assessment monitoring for statistically significant increases of thirteen constituents of concern, including seven volatile organic compounds. Ground water impacts appear to be the result of subsurface migration of landfill gas and not leachate derived.

The following three (3) alternatives for corrective measures were proposed in the CMP:

1. No action;
2. Natural attenuation, and;
3. Enhance existing active gas extraction system.

The Facility has proposed to implement Alternative 3, enhance existing active gas extraction system, as the preferred corrective measure. Enhancing the existing active gas extraction system along with ongoing ground water and gas monitoring will address the potential presence of gas derived constituents along the west side of the landfill and part of the south side. Monitoring wells MW-7US, MW-9A, MW-9TS, MW-110A, MW-113A, and 90-6SS have been designated as corrective measures monitoring wells and are sampled semiannually simultaneously with wells in the detection monitoring program. The corrective measures ground water monitoring is specified in the Corrective Measures Ground-Water Monitoring Plan found in Appendix A of the CMP received September 18, 2014 and last updated on May 7, 2015.

The area of impact from the subsurface migration of landfill gas has a vertical extent of approximately 18 feet and is restricted to the Upper Sand along the west side. This zone is partially saturated, allowing the migration of landfill gas. The vertical extent along the south side is restricted to the shallow Intertill Sand. The Upper Sand and Intertill Sand are significant zones of saturation and are not part of or interconnected with the uppermost aquifer system (UAS). The samples collected from wells in the UAS do not show any impact from the landfill.

There currently is an active landfill gas collection system at the Facility. Enhancement of the existing gas collection system to improve collection and containment efficiency of the landfill gas will consist of replacing existing gas wells in the area of concern; checking and repairing the gas collection lines; installing pumps where needed to keep gas wells dewatered; and improving the cap, as necessary. In accordance with OAC rule 3745-27-13, a formal authorization request detailing design for the system enhancements shall be submitted to the director within 90 days of approval of the CMP.

Ohio EPA has reviewed the CMP received September 18, 2014 and amended November 19, 2014, and determined that the selected alternative meets the requirements of OAC rule 3745-27-10(F). Therefore, I select corrective measures Alternative 3 to be implemented at the Facility as described in the CMP. Waste Management shall implement the selected corrective measures in accordance with the CMP as received September 18, 2014 and amended through May 7, 2015.

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 (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 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,

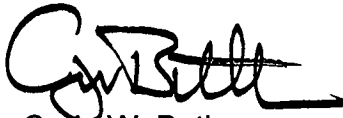
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Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
77 South High Street, 17th Floor
Columbus, Ohio 43215

If you have any questions concerning this action, please contact Jill Olberding of Ohio EPA, SWDO at (937) 285-6094.

Sincerely,

A handwritten signature in black ink, appearing to read "Craig W. Butler". The signature is stylized and cursive.

Craig W. Butler
Director

cc: Paul Stuart, Public Health Dayton Montgomery County
Michelle Ackenhausen, SWDO, DMWM