

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

OCT -2 2015

LAILNES CALCATON'S SCURNAL

Crawford County Board of Commissioners Crawford County Courthouse 112 East Mansfield Street Bucyrus, Ohio 44820 Re: Crawford County Commissioners

Director's Authorization

Approval

Municipal Solid Waste Landfills

Crawford County MSWL018774

Subject:

**Crawford County Landfill, Crawford County** 

Ohio Administrative Code (OAC) Rule 3745-27-10(D)(7)(c)(ii) Approval

## Dear Commissioners:

On September 2, 2015, the Ohio Environmental Protection Agency (Ohio EPA), Division of Materials and Waste Management (DMWM), Northwest District Office (NWDO) received the document titled "OAC Rule 3745-27-10(D)(7)(c)(ii) Alternate Source Demonstration for Monitoring Wells P-25 and NS-3" dated August 28, 2015, for Santek Environmental of Ohio, LLC (Facility) located in Crawford County. This document was submitted by the Mannik & Smith Group and contains ground water sampling results and the statistical analysis from the March 18, 2015, sampling and April 21, 2015, and June 9, 2015, resampling events at the Facility.

According to the document, analysis of the ground water detection monitoring data indicated the statistical significant changes were detected for chloride at monitoring well NS-3 and sodium at monitoring well P-25.

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 within 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 August 28, 2015, document concluded that the statistically significant change for chloride at monitoring well NS-3 and sodium at monitoring well P-25 was due to natural variation in ground water quality, and not as a result of impact from the landfill. Monitoring wells NS-3 and P-25 were initially sampled on March 18, 2015.

Ohio EPA has reviewed the applicable information and concurs with the demonstration included in the August 28, 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 NS-3 and P-25.

The August 28, 2015, submittal also contained a request to update background data for NS-3. Ohio EPA will address that request through separate correspondence.

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 the ground water quality assessment monitoring program 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 Street, 17<sup>th</sup> Floor Columbus, Ohio 43215

A detailed account of Ohio EPA's review of the ground water demonstration will be sent to you under separate cover.

## Crawford County Board of Commissioners Page 3

If you have any questions concerning this letter, please contact Susan Hardy of Ohio EPA, NWDO at (419) 373-3043.

Sincerely,

Shannon Nabors, Chief

Northwest District Office For Craig W. Butler, Director

/IIr

pc: Pete Sokoloski, NWDO, DDAGW

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