



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

OHIO E.P.A.

OCT 29 2015

REGISTERED DIRECTOR'S JOURNAL

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 September 18, 2015, the Ohio Environmental Protection Agency (Ohio EPA), Division of Materials and Waste Management (DMWM), Northeast District Office (NEDO), received a document titled "2015 First Semiannual Groundwater Monitoring OAC Rule 3745-27-10(D)(7)(c)(ii) Demonstration," dated September 18, 2015, for American Landfill (Facility) located in Stark County. This document was submitted by Eagon and Associates, on behalf of the Facility, and contains an alternate source demonstration as provided by OAC Rule 3745-27-10(D)(7)(c)(ii).

According to the document, analysis of the ground water detection monitoring data indicated that the following statistically significant changes were detected: chloride and sodium in monitoring well AMW-4, arsenic in monitoring well LKC-8, sodium in monitoring well LKC-10, ammonia and barium in monitoring well PHL/BC-4, barium and chloride 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 arsenic and barium in monitoring well PHL/BC-22.

Verification sampling was performed on May 20, 2015. Analysis of the re-sampling data verified the statistically significant changes for chloride and sodium in monitoring well AMW-4, arsenic in monitoring well LKC-8, sodium in monitoring well LKC-10, ammonia and barium in monitoring well PHL/BC-4, barium and chloride 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 arsenic 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

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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 September 28, 2015, document concluded that the statistically significant changes for chloride and sodium in monitoring well AMW-4, arsenic in monitoring well LKC-8, ammonia and barium in monitoring well PHL/BC-4, barium and chloride in monitoring well PHL/BC-5, barium in monitoring well PHL/BC-12, chloride in monitoring well PHL/BC-17, and arsenic and barium in monitoring well PHL/BC-22 were false positives due to statistical analysis.

In addition, the September 18, 2015, document concluded that the statistically significant changes for sodium in monitoring well LKC-10 and chloride in monitoring well PHL/BC-16 were false positives due to natural/spatial variation within the SZS and UAS.

Ohio EPA has reviewed the applicable information and concurs with the demonstration included in the September 18, 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-8, LKC-10, 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., 17<sup>th</sup> Floor  
Columbus, Ohio 43215

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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