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Mary Taylor, Lt. Governor  
Craig W. Butler, Director

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**LEGAL OFFICE**

JULY 11, 2016

Matthew Reardon  
Environmental Manager  
Solid Waste Authority of Central Ohio  
4329 London Groveport Road  
Grove City, Ohio 43123

**Re: Franklin County Sanitary Landfill  
Director's Authorization  
Approval  
Municipal Solid Waste Landfills  
Franklin  
MSWL018803**

**Subject: Franklin County Sanitary Landfill; Franklin County  
Ohio Administrative Code (OAC) Rule 3745-27-10(D)(7)(c)(ii) Approval**

Dear Mr. Reardon:

On May 27, 2016, the Ohio Environmental Protection Agency (Ohio EPA), Division of Materials and Waste Management (DMWM), Central District Office, (CDO) received a document titled "Statistical Analysis or Detection Monitoring Results – 2016 First Semiannual Event," dated May 2016, for the Franklin County Sanitary Landfill (Facility) located in Franklin County. This document was submitted by Eagon & Associates, Inc. on behalf of the Solid Waste Authority of Central Ohio, and contains the ground water sampling results and the statistical analysis from the March 14, 2016 and March 15, 2016 ground water sampling event at the Facility.

According to the document, analysis of the ground water detection monitoring data indicated that the following statistically significant changes were detected: chloride in monitoring well MW-16C; chloride and sodium in monitoring well MW-18Br; sodium in monitoring well MW-18C2; alkalinity in monitoring well MW-18Dr; and alkalinity in monitoring well MW-18RR.

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 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 May 2016 document concluded that the statistically significant changes for chloride at monitoring well MW-16C was due to road salt contamination, and not as a result of impact from the landfill. The May 2016 document also concluded that the statistically significant changes for chloride and sodium at monitoring well MW-18Br and the statistically significant changes for sodium and/or alkalinity in monitoring wells MW-18C2, MW-18Dr, and MW-18RR were due to natural ground water variability, and not as a result of impact from the landfill. Monitoring wells MW-16C, MW-18Br, MW-18C2, MW-18DR, and MW-18RR were initially sampled on either March 14 or March 15, 2016.

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Ohio EPA has reviewed the applicable information and concurs with the demonstration included in the May 2016 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 MW-16C, MW-18Br, MW-18C2, MW-18DR, and MW-18RR.

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

If you have any questions concerning this action, please contact Phil Farnlacher, DMWM, CDO at (614) 728-3890.

Sincerely,



Isaac A. Robinson, III, Chief  
Central District Office  
for Craig W. Butler, Director

c: Constance Livchak, DMWM, CDO  
Nathan Ralph, Franklin County Public Health  
Cal James, DDAGW, CDO