



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

OHIO E.P.A.

OCT 27 2016

ENTERED DIRECTOR'S JOURNAL

OCTOBER 27, 2016

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 Landfill  
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 August 5, 2016, the Ohio Environmental Protection Agency (Ohio EPA), Division of Materials and Waste Management (DMWM), Northeast District Office (NEDO) received a document titled "2016 First Semiannual Groundwater Monitoring OAC 3745-27-10(D)(7)(c)(ii)," dated August 2, 2016, for American Landfill (Facility) located in Stark County. This document was submitted by Eagon and Associates on behalf of American Landfill, Inc. and contains the ground water sampling results and the statistical analysis from the April 11, 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: arsenic in monitoring well LKC-8; benzene in monitoring well PHL/BC-4; barium in monitoring well PHL/BC-5; and chloride in monitoring well PHL/BC-16.

Verification sampling was performed on May 18, 2016. Analysis of the re-sampling data demonstrated that the statistically significant changes for barium in monitoring well PHL/BC-5 were false positives. Therefore, monitoring well PHL/BC-5 was automatically returned to the detection monitoring program pursuant to Ohio Administrative Code (OAC) Rule 3745-27-10(D)(7)(c)(i). Ohio EPA acknowledges the return of this well to the detection monitoring program. However, the re-sampling data verified the statistically significant changes arsenic in monitoring well LKC-8; benzene in monitoring well PHL/BC-4; and chloride in monitoring well PHL/BC-16.

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.

AMERICAN LANDFILL  
DIRECTOR'S AUTHORIZATION  
PAGE 2 OF 2

The August 2, 2016, document concluded that the statistically significant changes for arsenic in monitoring well LKC-8; benzene in monitoring well PHL/BC-4; and chloride in monitoring well PHL/BC-16 were due to natural and spatial variability of groundwater quality, and not as a result of impact from the landfill. Monitoring wells LKC-8, PHL/BC-4 and PHL/BC-16 were initially sampled on April 11, 2016.

Ohio EPA has reviewed the applicable information and concurs with the demonstration included in the August 2, 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 LKC-8, PHL/BC-4 and PHL/BC-16.

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 Karen Naples, DMWM, NEDO at (330) 963-1244.

Sincerely,



Kurt M. Princic, Chief  
Northeast District Office  
for Craig W. Butler, Director

KMP:KN:cla

ec: Jarnal Singh, Ohio EPA, NEDO, DMWM, [jarnal.singh@epa.ohio.gov](mailto:jarnal.singh@epa.ohio.gov)  
Eric Adams, Ohio EPA, NEDO, DDAGW, [eric.adams@epa.ohio.gov](mailto:eric.adams@epa.ohio.gov)  
Phil Revlock, Stark County Health Department, [revlopc@starkhealth.org](mailto:revlopc@starkhealth.org)