



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

OHIO E.P.A.

NOV - 8 2016

ENTERED DIRECTOR'S JOURNAL

NOVEMBER 8, 2016

Mr. Glen McMillan  
Fraser Papers  
Brookfield Place  
181 Bay Street, Suite 300  
Toronto, ON M5J 2T3  
Canada

Re: Fraser Papers Inc. Landfill  
Director's Authorization  
Approval  
Residual Solid Waste Landfills  
Montgomery County  
RSWL018779

**Subject: Fraser Papers Inc. Landfill, Montgomery County  
Ohio Administrative Code (OAC) Rule 3745-30-08(D)(9)(b) Approval**

Dear Mr. McMillan:

On August 9, 2016, the Ohio Environmental Protection Agency (Ohio EPA), Division of Materials and Waste Management (DMWM), Southwest District Office (SWDO) received a document titled "OAC 3745-30-08(D)(9)(b) Request for Director's Approval to Reinstate Well M-8IA to Detection Monitoring Program", dated August 8, 2016, for Fraser Papers Inc. Landfill (Facility) located in Montgomery County. This document was submitted by AST Environmental, Inc., on behalf of Fraser Papers LLC, and contains the ground water sampling results and the statistical analysis from the May 24, 2016 ground water sampling event at the Facility. This document also contains the sampling results from the June 27, 2016 verification re-sampling event.

The analysis of the ground water detection monitoring data included in the document indicates that the following statistically significant change was detected: alkalinity in monitoring well M-8IA.

Pursuant to OAC rule 3745-30-08(D)(9)(b), the owner or operator may demonstrate that a source other than the 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, the owner or operator is required to comply with the provisions of OAC rule 3745-30-08(E) for ground water quality assessment monitoring.

As demonstrated in the August 8, 2016 document, the statistically significant change for alkalinity at monitoring well M-8IA was due to natural variation in ground water quality, and not as a result of impact from the landfill. Monitoring well M-81A was initially sampled on May 24, 2016.

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Ohio EPA has reviewed the applicable information and concurs with the demonstration included in the August 8, 2016 document. Therefore, pursuant to OAC rule 3745-30-08(D)(9)(b), the owner or operator is hereby authorized to continue the detection monitoring program at the Facility for monitoring well M-8IA.

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 3745-30-08(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, 17th Floor  
Columbus, Ohio 43215

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

Sincerely,



Bonnie Buthker, Chief  
Southwest District Office  
for Craig W. Butler, Director

ec: Kenton Domer-Shank, Public Health Dayton & Montgomery County  
John McGinnis, DDAGW, SWDO  
Michelle Ackenhausen, DMWM, SWDO  
Glen McMillan, Fraser Papers

cc: Robert Welsh, AST Environmental, Inc.