



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

DEC - 1 2016

DECEMBER 1, 2016

ENTERED DIRECTOR'S JOURNAL

Mr. Peter Lucas, P.E.  
 District Engineer  
 Waste Management, Inc.  
 2460 S. Gettysburg Avenue  
 Dayton, OH 45417

Re: Pinnacle Road Landfill  
 Director's Authorization  
 Approval  
 Municipal Solid Waste Landfills  
 Montgomery County  
 MSWL019951

**Subject: Pinnacle Road Landfill, Montgomery County  
 Ohio Administrative Code (OAC) Rule 3745-27-10(C)(7)(g) Approval**

Dear Mr. Lucas:

On October 14, 2016, the Ohio Environmental Protection Agency (Ohio EPA), Division of Materials and Waste Management (DMWM), Southwest District Office (SWDO) received a document titled, "Statistical Analysis Program for Groundwater Quality Monitoring Pinnacle Road Recycling and Disposal Facility", dated October 12, 2016, for Pinnacle Road Landfill (Facility) located in Montgomery County. This document was prepared by Eagon & Associates, Inc. on behalf of Waste Management, Inc.

Pursuant to OAC rule 3745-27-10(C)(7)(g), background data can be added only in blocks of data resulting from the analysis of four or more statistically independent samples after the data has been statistically compared to the current background data and no statistical differences are detected, unless another method is deemed acceptable to the director.

Waste Management, Inc. has proposed using the following statistically significant data from MW-15LS, MW-7T, MW-11TS, MW-9TD, MW-8AQ, and MW-10AQ as part of the Facility's background data.

**TABLE I**

WELL	ZONE	PARAMETER	DATE	RESULT(S) (mg/L)	ASD APPROVED	OLD BACKGROUND	NEW BACKGROUND
MW-15 LS	Lower Sand	Sodium	9/2015	10.1	Yes	8/1994 – 12/2013	1/2010 – 6/2016
			10/2015	11.1	Yes		
			3/2016	11.6	Yes		
			4/2016	11.2	Yes		
MW-7T	Intertill Sands	Chloride	3/2014	16.9	Yes	3/2010 – 12/2013	1/2012 – 6/2016
			4/2014	16.6	Yes		
MW-11TS	Intertill Sands	Chloride	9/2014	60.1	Yes	3/2012 – 12/2013	9/2014 – 6/2016
			10/2014	57.1	Yes		
			3/2015	60.1	Yes		
			4/2015	61.5	Yes		
			9/2015	63.9	Yes		
			10/2015	60.7	Yes		
			3/2016	66.5	Yes		
4/2016	66.8	Yes					

<b>MW-9TD</b>	Intertill Sands	Chloride	3/2014	7.9	Yes	3/2010 – 12/2013	1/2012 – 6/2016	
			4/2014	8.3	Yes			
<b>MW-8AQ</b>	Buried Valley Aquifer	COD	3/2014	12.2	Yes (1 of m)	8/1994 – 12/2013	1/2003 – 6/2016	
<b>MW-10AQ</b>	Buried Valley Aquifer	Chloride	3/2014	68.5	Yes	2/2012 – 12/2013	3/2012 - 6/2016	
			Sodium	3/2014	39.6	Yes	3/2012 – 12/2013	3/2013 – 6/2016
				9/2015	38.0	Yes		
				10/2015	40.5	Yes		
				3/2016	42.5	Yes		
4/2016	42.0	Yes						

Ohio EPA has reviewed the applicable information and concurs with the addition of the above data to existing background data. Therefore, pursuant to OAC rule 3745-27-10(C)(7)(g), the owner or operator is hereby authorized to incorporate the above data in the Facility's background data.

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 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

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

Sincerely,



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

ec: Michelle Ackenhausen, DMWM, SWDO  
Kenton Domer-Shank, Public Health - Dayton and Montgomery County  
John McGinnis, DDAGW, SWDO  
Peter Lucas, Stony Hollow Landfill