



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

MARCH 14, 2018

Matthew Reardon  
Solid Waste Authority of Central  
Ohio  
4239 London Groveport Road  
Grove City, Ohio 43123

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

Ohio EPA MAR 14 '18  
Entered Directors Journal

**Subject: Franklin County Sanitary Landfill, Franklin County  
Ohio Administrative Code (OAC) Rule 3745-27-10(C)(7)(g) Non-Approval**

Dear Mr. Reardon:

On August 25, 2017, the Ohio Environmental Protection Agency (Ohio EPA), Division of Materials and Waste Management (DMWM), Central District Office (CDO) received a document titled "Statistical Analysis Program – Revision 7" dated August 25, 2017. The document was submitted in accordance with OAC Rule 3745-27-10(C)(7)(g) by Eagon & Associates, Inc., on behalf of Solid Waste Authority of Central Ohio, and requested to update the background data for monitoring wells MW-6Br, MW-6R, MW-16B, MW-16C, MW-18C2, and MW-22C at Franklin County Sanitary Landfill (Facility) located at 3851 London Groveport Road, Grove City, Ohio.

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 have been statistically compared to the current background data and no statistical differences are detected, unless another method is deemed acceptable to the director.

The August 23, 2017 document concluded that the background data for monitoring wells MW-6Br for potassium, MW-6R and MW-16B for sodium, MW-18C2 for potassium and sodium, and MW-22C for chloride and potassium were due to natural variation. Ohio EPA has reviewed the August 23, 2017 document and has determined that statistical differences have been detected in the background data for monitoring wells MW-6Br, MW-6R, MW-16B, MW-16C, MW-18C2, and MW-22C. Statistical tests performed on the data reveal significant differences between previous background periods and the data requested for addition. U.S. EPA statistical guidance advises against background updates when these conditions occur. There is also a lack of empirical data to demonstrate what natural processes are leading to the increasing trends or demonstrations showing that an

increasing trend is happening on a wider geographic area. Therefore, I cannot approve the request to update the existing background data for monitoring wells MW-6Br, MW-6R, MW-16B, MW-16C, MW-18C2, and MW-22C. Monitoring wells MW-16C, MW-18Dr, and MW-18RR will be addressed in a separate correspondence.

You are hereby notified that this action of the Director of Ohio EPA (Director) is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. 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  
30 East Broad Street, 4<sup>th</sup> Floor  
Columbus, Ohio 43215

If you have any questions concerning this letter, please contact Allan Hurtt of Ohio EPA, CDO at (614) 728-3889.

Sincerely,



Craig W. Butler  
Director

ec: Constance Livchak, DMWM, CDO  
Scott Hester, DMWM, CO  
Jeff Grose, Franklin County Public Health  
Martin Smith, DDAGW, CDO