



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

MAY 16, 2018

ELT - Marietta, Ohio L.L.C.
Attn: Matt Robinson
1650 Des Peres Road
St. Louis, MO 63131

Re: Connex Systems Pipe Inc.
Director's Authorization
Approval
Municipal Solid Waste Landfills
Washington County
MSWL019879

**Subject: Connex Pipe Systems Landfill, Washington County
End of Post-Closure Care Period**

Ohio EPA MAY 16 '18
Entered Directors Journal

Dear Mr. Robinson:

ELT - Marietta, Ohio L.L.C. (ELT) is the owner of Connex Pipe Systems Landfill (Landfill) located at 1115 Gilman Street in Marietta, Ohio in Washington County. The Landfill closed under a consent agreement issued September 9, 1986 by the Washington County Court of Common Pleas. In November 1987, Dravo Corporation (Dravo) completed closure of the Facility by final capping the approximately half-acre area of waste placement. In a letter dated November 17, 1994, the Ohio Environmental Protection Agency (Ohio EPA) determined that Dravo had complied with the September 9, 1986 consent decree and advised Dravo to continue post-closure care for 30 years.

On September 19, 2017, Ohio EPA, Southeast District Office (SEDO) received a letter from you requesting to be released from the post-closure care requirements pursuant to OAC Rule 3745-27-14(C). The Landfill has been in post closure care for 30 years as of December 1, 2017. Ohio EPA approved the owner to end groundwater monitoring on December 10, 2004, and subsequently Geodysey Inc. documented the abandonment of the monitoring wells at the Landfill. The Landfill was a captive solid waste landfill and did not require explosive gas monitoring.

Ohio EPA staff have reviewed the September 9, 1986 consent decree, available groundwater monitoring data and other facility documents, conducted a site inspection, and concluded that the post-closure care requirements have been met and current site conditions do not pose a risk to human health or safety or the environment. Therefore, I acknowledge that the obligations set forth in the September 9, 1986 consent decree, including the post-closure care period for the Connex Pipe Systems Landfill, have been completed.

Please be advised that OAC Rule 3745-27-13 is still applicable to this facility. OAC Rule 3745-27-13(A) states:

No person shall, without authorization from the director, engage in filling, grading, excavating, building, drilling, or mining on land where a hazardous waste facility or solid waste facility was operated. Any person proposing to engage in these activities on land where a hazardous waste facility or solid waste facility was operated shall comply with the requirements of this rule.

While ELT is no longer obligated to conduct post-closure care activities at the Landfill pursuant to the solid waste regulations, ELT should recognize that ORC Chapter 6111 prohibits causing pollution to waters of the state. Therefore, Ohio EPA recommends that ELT continue to undertake reasonable measures to prevent impacts from the Landfill, such as periodic inspection and maintenance of the landfill cap and any surface water control features on the property.

You are hereby notified that this action of the 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
30 East Broad Street, 4th Floor
Columbus, OH 43215

If you have any questions regarding this authorization, please contact Rich Fox of Ohio EPA SEDO at (740) 380-5441.

Sincerely,



Craig W. Butler, Director

CB/DB/mr

ec: Rich Fox, DMWM, SEDO
Jeremy Carroll, DMWM, CO