



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

AUGUST 21, 2018

Mr. Steve Lonneman
District Manager
Evergreen Recycling & Disposal Facility
2625 East Broadway
Northwood, Ohio 43619

Re: Evergreen Recycling & Disposal
Director's Authorization
Non-Approval
Municipal Solid Waste Landfills
Wood County
MSWL018761

Ohio EPA AUG 21 '18
Entered Directors Journal

**Subject: Evergreen Recycling & Disposal Landfill, Wood County
Ohio Administrative Code (OAC) Rule 3745-27-10(C)(7)(g) Non-Approval**

Dear Mr. Lonneman:

On April 9, 2018, the Ohio Environmental Protection Agency (Ohio EPA), Division of Materials and Waste Management (DMWM), Northwest District Office (NWDO) received a document titled "Groundwater Quality Statistical Analysis Program (Revision 11)" dated April 5, 2018. The document was submitted in accordance with OAC Rule 3745-27-10(C)(7)(g) by Eagon & Associates, Inc. on behalf of Waste Management and requested to update the background data for monitoring well MW-15-LTR at Evergreen Recycling & Disposal Facility (Facility) located in Wood County. Waste Management is the owner of the Facility.

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.

Waste Management has proposed using previously statistically significant chloride and sodium data in the statistical background database for monitoring well MW-15LTR. From 2003 to 2014, chloride concentrations at the monitoring well MW-15LTR location ranged from 5.6 mg/L to 7.5 mg/L and sodium concentrations ranged from 97 mg/L to 150 mg/L. Beginning in 2015, both parameters increased. Concentrations of total dissolved solids and magnesium at monitoring well MW-15LTR also show slight increasing trends recently.

Monitoring well MW-15LTR was installed in 2003 as a replacement monitoring well for monitoring well MW-15LT, which had been exhibiting statistically significant increases for chloride. At that time, Waste Management proposed to install a replacement well, monitoring well MW-15LTR, suspecting that the statistically significant increase in chloride might have been occurring due to the structural integrity of the well being compromised. However, this speculation was never proven.

Considering the recent increases in chloride, sodium, total dissolved solids, and magnesium at monitoring well MW-15LTR and that monitoring well MW-15LT, which monitoring well MW-15LTR replaced, showed similar concentration patterns for chloride, it is still not clear whether these concentrations represent background or whether they could be indicators of a ground water impact from the Facility.

Ohio EPA has reviewed the April 5, 2018 document and has determined that Waste Management has not provided sufficient evidence to update background data at monitoring well MW-15LTR. Therefore, I cannot approve the request to update the existing background data for monitoring well MW-15LTR.

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, Ohio 43215

If you have any questions concerning this letter, please contact Tyler Madeker of the Ohio EPA, Northwest District Office at (419) 373-3078.

Sincerely,

A handwritten signature in black ink, appearing to read 'C. Butler', with a large circular flourish on the left side.

Craig W. Butler
Director

ec: Allan Razem, Eagon & Associates, Inc.
Dennis Recker, City of Northwood
Scott Hester, CO, DMWM
Chad Zajkowski, NWDO, DDAGW
Mike Reiser, NWDO, DMWM
Ken Brock, NWDO, DMWM
Tyler Madeker, NWDO, DMWM

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