Dear Mr. Trainer:

On September 24, 2019, the Ohio Environmental Protection Agency (Ohio EPA), Division of Materials and Waste Management (DMWM), Northwest District Office (NWDO) received a request, dated September 23, 2019, titled “Groundwater Detection Monitoring Program Revision, OAC Rule 3745-27-10(C)(7)(g) Request to Update Background Datasets and Groundwater Statistical Analysis Plan Revisions”. The document included a demonstration in accordance with OAC Rule 3745-27-10(C)(7)(g) by Civil & Environmental Consultants, Inc., on behalf of Port Clinton Landfill (Facility) and requested to update the background data group representing the background water quality at monitoring wells BW-10 for arsenic, MW-11 for arsenic, MW-17 for sodium, MW-18 for sodium, MW-27 for alkalinity, MW-29 for alkalinity and chloride, and MW-32 for chromium at the Facility located at 530 North Camp Road Port Clinton, Ohio, Ottawa County. Note that this letter regards the demonstration for the above wells, except MW-27. Ohio EPA’s review of the demonstration for MW-27 and the Ground Water Monitoring Plan will be detailed in separate letters.

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.

Ohio EPA has reviewed the September 23, 2019, document and concurs with the request that the statistically different data summarized in the table below be added to the existing background datasets. Ohio EPA’s review determined that the owner or operator has provided sufficient evidence to demonstrate that the statistically different data can be added to the existing background datasets and meets the requirements of OAC 3745-27-10(C)(7)(g) in the document. Therefore, Ohio EPA approves this request pursuant to OAC 3745-27-10(C)(7)(g) at Port Clinton Landfill.

<table>
<thead>
<tr>
<th>Well</th>
<th>Parameter</th>
<th>Date</th>
<th>Concentration (mg/L)</th>
</tr>
</thead>
<tbody>
<tr>
<td>BW-10</td>
<td>Arsenic</td>
<td>11/20/2014</td>
<td>0.0017</td>
</tr>
<tr>
<td></td>
<td></td>
<td>1/6/2015</td>
<td>0.0019</td>
</tr>
</tbody>
</table>
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  
30 East Broad Street, 4th Floor  
Columbus, Ohio 43215

If you have any questions concerning this letter, please contact Kilynn Sandberg of Ohio EPA, NWDO at (419) 373-6130.

Sincerely,

Shannon Nabors  
Chief, Northwest District Office  
for Laurie A. Stevenson  
Director, Ohio EPA

/bnb

ec: Dawn Wright, Republic Services Inc.  
    Tim Wasserman, OSS-SWMD  
    Nick Bohland, CEC Inc.  
    Tyler Madeker, DMWM-NWDO  
    Mike Reiser, DMWM-NWDO  
    Ken Brock, DMWM-NWDO

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