



Division of Materials and Waste Management Response to Comments

**Project: Bond Road Landfill
Authorized Maximum Daily Waste Receipt (AMDWR) Increase
Ohio EPA ID #: PTI Application Number 1466298**

Agency Contacts for this Project

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Ohio EPA held a public hearing and associated comment period on April 12, 2022 regarding a proposed AMDWR increase for the Bond Road Landfill. This document summarizes the comments and questions received at the public hearing and during the associated comment period, which ended on May 4, 2022.

Ohio EPA reviewed and considered all comments received during the public comment period; however, questions and comments that do not pertain to the permit under consideration are noted as such in this document. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format.

Siting, Design, and Operations

Comment 1: The Rule #3745-27-07(E)(1) reads: “At a minimum, an adequate demonstration for a sanitary landfill facility includes the following: (1) an explanation of the overall site design, including construction time and fill sequences for the sanitary landfill facility.” Nowhere in its application did Rumpke provide a plan for the overall site design of the entire 576 acre site.

Response: The permit application proposes an increase to the AMDWR to 1,500 tons. The applicant stated in the permit application that there is no change to the overall design or construction phasing. Upon request by Ohio EPA in correspondence dated December 17, 2021, the applicant subsequently provided an update to facility operations and material handling as affected by the proposed AMDWR increase. Since the limits

of waste placement did not change, Ohio EPA did not request any further updates to the application.

Comment 2: **OAC Rule 3745-27-06(B)(2)(a)(i) siting criteria only protects the water, ground water, drinking water wells within 1,000 feet and 2,000 feet of the limits of waste. Many of these environmental features are just outside the applicable 1,000 foot or 2,000 foot distances and should be considered and protected.**

Response: Ohio's landfill regulations provide siting criteria for municipal solid waste landfills that are protective of human health, safety, and the environment. The landfill design, including a synthetic liner system and leachate collection system, also provides protection to Ohio's groundwater resource. Ohio's landfill regulations also require that landfills install a groundwater monitoring network capable of detecting a release to groundwater and, if a release is detected, assessment and corrective measures will be implemented to ensure any contaminants are contained and remediated. Based on historical groundwater data, there has been no impact to groundwater caused by Bond Road Landfill.

Comment 3: **The slope assessment on the Bond Road property was only done on the prior property, not on the property just bought. It was also only relevant to the conditions at that time, not more weight, more height, more traffic, etc. The slope assessment needs to be based in the topography of the entire property.**

Response: The permit application proposes an increase to the AMDWR to 1,500 tons and does not affect the limits of the waste placement area, construction, fill sequence, or liner and cap design. The application does not propose to change the slopes or limits of waste placement; therefore, a new slope stability analysis was not required. The existing landfill permit provides the required slope stability analyses and meets applicable safety factors.

Comment 4: **There is a major aquifer, the Great Miami Aquifer, in close proximity to the Bond Road Landfill. This aquifer supplies water to the Village of Cleves, the Village of North Bend, Whitewater Township and the surrounding areas, via the Kilby road pump, as well as, unconnected water sourcing from cisterns and private wells. There are concerns about the ground water surrounding the landfill.**

Response: Ohio's landfill regulations provide siting criteria for municipal solid waste landfills that are protective of human health, safety, and the environment. The landfill design, including a synthetic liner system and leachate collection system, also provides protection to Ohio's groundwater resource. Ohio's landfill regulations also require that landfills install a groundwater monitoring network capable of detecting a release to groundwater and, if a release is detected, assessment and corrective measures will be implemented to ensure any contaminants are contained

and remediated. Based on historical groundwater data, there has been no impact to groundwater caused by Bond Road Landfill.

Comment 5: Millions of gallons of landfill leachate containing contaminants such as PCBs and PFAS are transported to Harrison Wastewater treatment plant. The Harrison wastewater plant does not have the technology to remove forever contaminants such as PFAS.

Response: This comment does not pertain to this application.

Comment 6: The concentration of contaminants in leachate will increase with the increase of AMDWR to 1,500 tons/day and the wastewater treatment plant cannot efficiently treat the leachate. The leachate needs to be pretreated prior to discharge.

Response: Wastewater treatment plants require testing of materials to ensure the treatment system is not disrupted and effluent meets applicable water quality standards. Should the leachate no longer meet the required standards, Bond Road Landfill will work with the wastewater treatment plant to determine if pretreatment or transportation to an alternate wastewater treatment plant may be necessary.

Comment 7: Increasing the daily tonnage received at the Bond Road Landfill will increase the amount of leachate generated. Currently, at a limit of 100 tons a day, and operating at a fraction of that, Rumpke cannot sufficiently keep up with the storing and hauling of leachate, as evidenced by their leachate tanker trucks being operated outside of the defined hours on a regular basis and confirmed at the April 6, 2022 Rumpke's info session.

Response: Increasing the AMDWR may not increase the leachate amount in the future. Landfill leachate can be variable and affected by precipitation since the landfill is not under final cover. The existing permit does not dictate leachate hauling hours. Currently, the facility maintains four 20,000-gallon leachate storage tanks with a combined capacity for 80,000 gallons, which complies with the approved permit leachate storage tank design calculations based on an AMDWR of 4,000 tons. The permit provides an increase in leachate storage capacity to 322,000-gallons in future landfill development.

Comment 8: How many leachate tanks are on record with Ohio EPA? During Ohio EPA's hearing you stated there are two holding tanks for leachate at Bond Road Landfill. But, Rumpke told the public there were four tanks? Are the other two you don't know about legal? What was the problem brought to Ohio EPA's attention regarding the leachate problem on Bond Road Landfill?

Response: As mentioned in **Comment 7** response, currently, the facility maintains four 20,000-gallon leachate storage tanks with a combined capacity for

80,000 gallons, which complies with the approved permit leachate storage tank design calculations based on an AMDWR of 4,000 tons.

Comment 9: There is no data supporting that all the leachate is captured for removal.

Response: Ohio's landfill regulations require that landfill leachate is collected and sent to an authorized wastewater treatment plant. Hamilton County Public Health is approved to administer Ohio's solid waste program, which includes landfill inspections. Ohio EPA has not been contacted by Hamilton County Public Health regarding leachate problems at Bond Road Landfill. Annual report data provided by Rumpke reports leachate volumes sent to an authorized wastewater treatment.

Comment 10: There are records from Ohio EPA stating that there is a leachate problem at the landfill dating back to 1977. If that's the case, why does Ohio EPA keep allowing for the permits?

Response: Leachate outbreaks may occur at landfills and are addressed by the operator at the time of occurrence. There are no known leachate problems at the landfill at this time.

Comment 11: There are concerns about explosive gas migration to neighboring properties and to Indiana.

Response: Ohio's landfill regulations provide siting criteria for municipal solid waste landfills that are protective of human health, safety, and the environment. The landfill design, including a synthetic liner system, also provides protection from landfill gas migration. Ohio's landfill regulations also require that landfills install an explosive gas monitoring network capable of detecting any migration of explosive gas and, if migration is detected, assessment and corrective measures will be implemented to ensure any explosive gas is contained and remediated. Based upon the most recent monthly monitoring data from Bond Road Landfill, there is no evidence of any detections of explosive gas in the monitoring network surrounding the landfill.

Comment 12: Explain the relationship between BAT and actual compliance with rules.

Response: This comment does not pertain to this application.

Comment 13: Citizens are concerned the BAT used at Bond Road are behind the times and cannot present the best technology to protect public health and the environment. Citizens are also worried the facility is not using BAT even though they put BAT in the permit.

Response: It is unclear from this comment what specific technology the commenter believes Bond Road Landfill should be using. This comment does not pertain to this application.

Surface Water

Comment 14: **Surface water and leachate generated from Bond Road Landfill will go into Sand Run Creek and Fox Run Creek, two important tributaries of the Whitewater River. Citizens also are concerned that Whitewater River water quality will degrade due to the runoff from the Bond Road Landfill.**

Response: Ohio's environmental regulations prohibit the discharge of landfill leachate into waters of the state. Landfill leachate is collected in onsite storage tanks and sent to an authorized wastewater treatment plant. The AMDWR increase proposed in the permit application does not change the existing landfill configuration, sedimentation pond location, or operation. Bond Road Landfill is required to comply with its National Pollution Discharge Elimination System (NPDES) permit that includes conditions for the management of stormwater and requires monitoring of sedimentation ponds. The discharge of stormwater from the Bond Road Landfill is regulated by the NPDES permit 11I00075*FD which became effective on February 1, 2019. The discharge of stormwater which has contacted with waste material is prohibited and therefore is not anticipated to impact the water quality in Fox Run Creek. The NPDES permit includes limitations and monitoring requirements related to the discharge of storm water which has not been in contact with the waste materials. Discharge limitations and monitoring requirements are designed to be protective of the water quality in the receiving stream.

Comment 15: **Ohio EPA monitors the end of the pipe water, not the impacts on the small rivers surrounding the property. Citizens previously requested Ohio EPA Surface Water Division put a fish-macroinvertebrate-chemistry site below the Bond Road Landfill drainage and the request was refused.**

Response: This comment does not pertain to this application.

Comment 16: **Conduct more surface water monitoring downstream from the site at Fox Run Creek. Ohio EPA shouldn't approve an increase in daily tonnage without enough water monitoring surrounding the landfill.**

Response: The current sedimentation pond is part of the approved permit, authorized on March 17, 1998, and was designed based on the facility operating with an authorized maximum daily waste receipt of 4,000 tons. The permit application proposed an authorized maximum daily waste receipt of 1,500 tons. Bond Road Landfill is required to comply with its NPDES permit that includes conditions for the management of stormwater and requires monitoring of sedimentation ponds discharge as mentioned in **Comment 14** response.

Comment 17: **Fox Run and Sand Run Creeks are water sources for people or animals, and tributaries to the Whitewater River; increasing the AMDWR may result in harm to the streams.**

Response: Bond Road Landfill is required to comply with its NPDES permit that includes conditions for the management of stormwater and requires monitoring of sedimentation ponds.

Comment 18: **Rumpke stated at the public meeting that a stream goes to the holding pond. Is Ohio EPA aware of this? Has Ohio EPA looked into the environment of the stream, and is the stream now stopped from flowing? The citizen's understanding is that Fox Run Creek is shaped like a Y, the longer part is connected to the Whitewater River. Is the top of Fox Run Creek blocked? Will the Whitewater River be affected from the blocked stream?**

Response: The holding pond, which is known as a sedimentation pond in Ohio's laws and regulations, does not receive flow from Fox Run Creek. The creek is not stopped by the sedimentation pond nor is the flow pattern of Fox Run Creek changed. The sedimentation pond does not block any waters of the state.

Comment 19: **There are concerns about increased runoff from the proposed increase in AMDWR and whether the sedimentation ponds are adequately sized.**

Response: The sedimentation pond design is based on an AMDWR of 4,000 tons and is designed to handle up to a 25-year/24-hour storm event with some additional volume. The permit application proposed an AMDWR receipt of 1,500 tons, so the current design is adequate for the for the proposed AMDWR increase. The AMDWR increase proposed in the permit application does not change the existing landfill configuration, sedimentation pond location, or operation.

Comment 20: **The current sedimentation pond is at the top of the hill catching only the first 60 acre-approved development. The pond could become contaminated if there is an accident during wet weather.**

Response: This comment does not pertain to this application.

Comment 21: **There will be a truck-washing facility near the new Sand Run Road entrance. Since construction has started, is there a sediment pond to catch the mud from the undercarriages of the garbage trucks and the leachate tankers before they leave the premises?**

Response: This comment does not pertain to this application.

Comment 22: **This site will likely be used for 50 years and emergencies will happen, but the infrastructure you will regulate is based on a different transient system.**

Response: This comment does not pertain to this application.

Air

Comment 23: If the expansion is permitted, how will Rumpke control air pollutants from entering into Indiana?

Response: The permit application proposes an increase of the AMDWR from 100 tons to 1,500 tons. Rumpke is required to control air pollutants through its current Title V air permit, which was renewed and issued final on June 9, 2022. The Title V permit is based on daily waste receipts of 4,000 tons. Southwest Ohio Air Quality Agency also conducts monthly air monitoring measuring methane and total volatile organic compounds.

Comment 24: Can you please explain how an increase in tonnage (materials dumped) does not increase air or health factors? Operations at the site and hundreds of additional truck trips to and from the site will increase air pollution, including particulate matter, nitrogen oxides, and sulfur dioxide.

Response: An AMDWR increase does not increase air emissions and does not increase the health risk at the site. The permit application proposes to increase the AMDWR to 1,500 tons. The permit application does not propose a horizontal or vertical expansion of the waste limits; therefore, the total permitted airspace (or volume) of waste approved to be disposed at the site remains the same. Ohio's landfill regulations require municipal solid waste landfill to cover all waste at the end of each working day. In addition, the facility must comply with the current approved Title V air permit, which is based on an AMDWR of 4,000 tons.

Comment 25: Rumpke's Bond Road permit fact sheet states - Ohio EPA has done numerous studies and found no known risk to human health. Can you provide these studies and the credentials? Do you dispute the numerous research and peer reviewed studies that have associated health risk to humans, specifically children?

Response: Rumpke's Bond Road permit fact sheet refers to multiple EPA studies and is not specific to Ohio EPA. Ohio EPA has implemented rules in accordance with state laws which are protective of human health and the environment. Ohio EPA does not evaluate or comment on any research and peer review studies of landfill effects on human health.

General

Comment 26: If a roadway accident occurs involving a truck carrying leachate, fugitive leachate spill may contaminate nearby streams.

- Response: This comment does not pertain to this application.
- Comment 27:** **There are concerns about property values near the landfill, increased truck traffic on the narrow winding roads, mud on the roads, and roadway damage caused by the trucks.**
- Response: Ohio EPA does not have the authority to consider truck traffic or roadway damage when evaluating a solid waste permit application.
- Comment 28:** **How many violations does Rumpke have at this site?**
- Response: Hamilton County Public Health is approved to administer and enforce Ohio's solid waste program, including landfill inspections. Ohio EPA also performs engineering and groundwater related inspections. Ohio EPA is unaware of any current violations at this facility.
- Comment 29:** **Bond Road Landfill failed to receive solid waste for disposal at this site for a period of greater than one year. They were in violation in the years of 1999, 2012, and 2013 which violate 3745-27-11. Although it is Rumpke who did not adhere to the rules, it is Ohio EPA itself that did not enforce them. In light of this, an independent investigation, outside Ohio EPA, should also be conducted.**
- Response: Ohio EPA received a verified complaint regarding this allegation and is completing its investigation in accordance with Ohio Revised Code Section 3745.08.
- Comment 30:** **Rumpke's Colerain site has many problems such as odor, reaction area, contamination of nearby Banklick Creek, and similar problems which could happen at the Bond Road landfill. Ohio EPA should consider Rumpke's compliance problems at the Colerain site for this application.**
- Response: When considering a permit application for an existing facility, Ohio EPA evaluates the applicant's substantial compliance at that solid waste facility.
- Comment 31:** **Hamilton County Commissioners passed a set of Solid Waste Rules for the Hamilton County Solid Waste District on Dec. 16, 2021. The rules are being appealed. The proposed increase in AMDWR, with its direct impact on so many facets of the Bond Road Landfill site, cannot be legitimately considered at this time while a lawsuit is active.**
- Response: Ohio EPA reviewed this application in accordance with the relevant state law and regulations. The lawsuit between Rumpke and Hamilton County Commissioners does not affect Ohio EPA's action regarding this permit application.

Comment 32: Most of the impacts for road widening, for reductions in house values for residents, and for a list of diseases that children and residents are likely to get inside the air dome over the site (with nighttime radiation inversions) are not considered in any of your permitting. You are just minimally following the laws of Ohio Code and not being responsible to the human or natural environmental risks.

Response: Ohio EPA does not have the authority to consider roadway impacts and house values when evaluating a solid waste permit application.

Comment 33: This is a poor community without an ability to generate income or mount much resistance. Rich neighborhoods like Blue Ash bought their old airport and made Summit Park. Indian Hill bought the abandoned gravel pits below them on the Little Miami River making it into an exclusive wetland preserve. This construction is an environmental justice issue that should require special care to safeguard their environment. With the EPA Environmental Justice goals, the overburdening of western Hamilton County and Hamilton County as a whole must be considered.

Response: As a recipient of federal funding, Ohio EPA is under a legal obligation to comply with Title VI of the Civil Rights Act. Ohio EPA has fully reviewed the guidance developed by U.S. EPA for states regarding environmental justice. Ohio EPA meets the legal obligations and implements federal guidance through both its technical review and its public involvement activities on permit applications. Under Title VI, states are prohibited from using criteria or methods of administering its program which have the effect of subjecting individuals to discrimination because of their race, color, or national origin. As a result, states may not issue permits that are intentionally discriminatory, or issue permits that have a discriminatory effect based on race, color, or national origin. While Ohio EPA does not have a specific environmental justice policy to follow, Ohio EPA considers all comments regarding environmental justice to ensure compliance with Title VI. Also, Ohio EPA issues permits based upon standards that are equally protective of all Ohio citizens. In addition, the public can view environmental and demographic indicators for the region close to the landfill through U.S. EPA tool EJScreen and EnviroAtlas. The links are [EJScreen: Environmental Justice Screening and Mapping Tool | US EPA](#); [EnviroAtlas Interactive Map | US EPA](#).

Comment 34: Most of the homes around the landfill site that were built before the early 2000s do not have access to public water and rely on collecting water from their roofs. The landfill will bring a large increase in scavenger birds to the area and to our rooftops and gutters that collect the rain water. The birds and their fecal matter carry over 60 transmissible diseases some of which are known to be fatal to humans. There will be many people in the area left unaware of the dangers and will continue to use the water for

drinking, cooking, cleaning, filling their children's bath and pools and feeding their pets and livestock.

Response: Concerns about private drinking water collection should be directed to Hamilton County Public Health.

Comment 35: Why was there secrecy around the announcing of the Bond Road Landfill?

Response: Ohio law requires public involvement for a solid waste permit, including an applicant's meeting when the permit application is submitted and a public information session and public hearing prior to the Director taking an action. All meetings are public noticed in accordance with Ohio law. Rumpke notified the neighbors in 2021, via newsletter, of future plans for the facility and held an applicant public meeting on April 6, 2022, to discuss the permit application. Ohio EPA held a public information session and public hearing on April 12, 2022, to discuss the application review and answer related questions. All related application documents and letters can be found on Ohio EPA's website through eDocument Search.

Comment 36: Do other counties have plans for their own waste disposal since Rumpke is using Hamilton County as waste disposal for other counties?

Response: Ohio EPA does not have authority to restrict the transportation of solid waste between Ohio's counties or from other states. You may contact local solid waste management districts to review local solid waste management plans.

Comment 37: How can counties be allowed to regulate their waste when corporations sue them for trying?

Response: Ohio EPA does not have authority restrict the transportation of solid waste between Ohio's counties or from other states.

Comment 38: Should corporations have more rights than those who reside in the area and must live with the problems?

Response: This comment does not pertain to this application.

Comment 39: How can residents compete with the financial resources of corporations in contesting these permits?

Response: This comment does not pertain to this application.

Comment 40: How will a nearby dump impact our now-rural neighborhood?

Response: This comment does not pertain to this application.

Comment 41: Will we experience the plight of the many neighbors who live near Mt. Rumpke in Hamilton County's Colerain Township?

Response: This comment does not pertain to this application.

Comment 42: Why should Hamilton County bear the brunt of two large dumps? One is enough!

Response: This comment does not pertain to this application.

Comment 43: Our state plan requires the maximum feasible use of the existing landfill. Rumpke Colerain has over 30 years of life still. The State's objective is to limit the use of landfills in Ohio. Why is Ohio EPA violating the objectives of the State by opening another landfill?

Response: The permit application proposes an increase to the AMDWR to 1,500 tons and does not expand the current limits of the waste placement area. House Bill 592 emphasized the need to reduce Ohio's reliance on landfills for the disposal of waste by increasing solid waste reuse, recycling, and minimization efforts. To limit the use of landfills, solid waste management districts adopt solid waste management plans to increase waste reduction, recycling, and composting activities. The solid waste management districts ensure sufficient landfill capacity communities within their jurisdiction.

Comment 44: What types of waste Monsanto disposed of at this site, including the amount of waste, if it included PCBs, and what assessment or remediation actions have been done at this site.

Response: Bond Road Landfill has been operating at its current location since the 1960s. Ohio EPA records for this facility are available electronically on the public document system: <https://epa.ohio.gov/help-center/edocument-search>. This comment does not pertain to this application.

Comment 45: Please conduct an independent investigation into any legacy contamination be conducted before approving any new permits, expansions, or renewals.

Response: This comment does not pertain to this application.

Comment 46: Please provide the information about what Monsanto dumped, the details and date(s) of the remediation or any testing prior to and after clean up.

Response: This comment does not pertain to this application.

Comment 47: Did Monsanto provide incentives to neighboring Bond Road properties similar to DuPont?

Response: This comment does not pertain to this application.

Comment 48: What was so bad at the Bond Road Landfill that in 1995 PHH Home Equity referenced a presentation on the situation in Anniston, Alabama?

Response: This comment does not pertain to this application.

Comment 49: Who is considered a "party" to this action. Please provide parameters. Is it dependent upon where you live to be a party to contest the results of this action?

Response: According to the Environmental Review Appeals Commission decision for Case No. ERAC 21-7107, two avenues exist for a person to establish individual standing: (1) Under ORC 3745.04, a person may establish standing to appeal a final action of the director by showing that he or she is "affected" by the director's action and that he or she was a "party to a proceeding before the director." To be a "party to a proceeding before the director," a person must have "appeared" before the director. (2) Standing may also be established by persons who were not a "party to a proceeding" if they can demonstrate that they were "aggrieved or adversely affected" by the director's final action.

The Tenth District has stated that a person is "affected" or "aggrieved or adversely affected" by the director's final action if: "the challenged action will cause injury in fact, economic or otherwise and the interest sought to be protected is within the realm of interests regulated or protected by the statute being challenged."

Comment 50: Explain what mitigation is and the limits. When is mitigation of a hazard too much triggering different actions?

Response: This comment does not pertain to this application.

Comment 51: Ohio EPA statutes states that the permit process is a "proposal" and that Rumpke is not EXEMPT from other authority of the any other body their rules, etc., during this process. The statutes also state that the date on which a landfill operator takes an action including earth moving, etc. is the date in furtherance of construction. So, at what point is a landfill operator is no longer subject to the rules or authority of anybody? In what order must a landfill operator pursue approval from each authority?

Response: This comment does not pertain to this application.

Comment 52: If Ohio EPA is talking with Hamilton County Board of Health regarding the leachate problems, would that be in public records? How many times has Ohio EPA been notified of problems from Hamilton County Public Health?

Response: Ohio EPA has not been contacted by Hamilton County Public Health regarding leachate problems at Bond Road Landfill. A public records request may be made to obtain copies of letters and other correspondence defined as a public record. Please visit Ohio EPA's website for more information – epa.ohio.gov/about/media-center/access-public-records/

Comment 53: There were many irregularities in the Ohio EPA public hearing, such as access denied, public comment controlled, apologetic explanations, no live captioning. The obligation for a Public Hearing has not been sufficiently met by the Ohio EPA, therefore the application cannot be ruled on.

Response: During the COVID-19 pandemic, the Ohio General Assembly provided a temporary statutory exception to the "in person" requirement that allowed public bodies to meet virtually. This means that public bodies may hold meetings via teleconference, videoconference, or any similar electronic technology and still have the meeting considered "in person" for purposes of the Open Meetings Act. This exception was temporary; it expired July 1, 2022. The Bond Road Landfill AMDWR virtual hearing was scheduled one month before April 12, 2022, during the COVID-19 pandemic. Ohio EPA follows the state's guidance to protect public health during the pandemic.

In addition, public comments were not controlled during the hearing. Due to the large amount of comments and time limit of the virtual meeting, Ohio EPA staff answered questions related to this AMDWR application.

Ohio EPA understands some citizens may have had challenges accessing the virtual hearing and giving comments during the meeting. Ohio EPA accepted public comments through mail and email. Ohio EPA extended the public comment period per citizens' requests. Written comments were accepted until May 4, 2022. Ohio EPA compiled this response to comments that explains the Agency's answers to questions and comments about this application and the director's final action.

Comment 54: Was the public hearing meeting on the Bond Road Landfill archived? Is there a link to watch it again?

Response: Yes, the public hearing was recorded. It is available at <https://attendee.gotowebinar.com/recording/3828209639195309826>
To make a public records request, please contact:
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End of Response to Comments