SCS ENGINEERS

November 21, 2017 File No. 23212007.05

Ms. Tracy Buchanan Ohio EPA Southwest District Office 401 East Fifth Street Dayton, Ohio 45402-2911

Subject: Village of St. Bernard Landfill

MP-10 Final Contingency Monitoring Report

Dear Ms. Buchanan:

Per the approved EGMP for the above referenced site and in compliance with OAC 3745-27-12 (E)(5)(g)(iii), the owner/operator will submit a report to the Ohio EPA and Hamilton County Public Health when the contingency monitoring discontinuation criteria are met. This letter serves as that report for MP-10. A site map is presented in Attachment A.

Analysis and Summary

The initial exceedance of the 5 percent combustible gas threshold at MP-10 occurred on June 8, 2017 and the exceedance continued through October 31, 2017. The combustible gas concentration fell below 5 percent on November 8, 2017. Four rounds of readings with combustible gas concentrations were collected over a 2 week period. MP-10 has met the criteria for ending contingency monitoring and will return to quarterly monitoring as you were informed in our data submittal of November 17, 2017.

The results of the contingency monitoring performed to date are included in Attachment B. The most recent monitoring was performed on November 17, 2017. The lateral extent of the explosive gas concentration above the threshold limit was the immediate vicinity of MP-10. No concentrations of explosive gas were detected in MP-17, located approximately 75 feet west of MP-10, or in MP-9, which is located 55 feet east of MP-10. No explosive gas was detected at the BP-1 bar punch location, located at the southwest corner of the Kistner property, 437 Bank Avenue approximately 10 feet north northeast of MP-10.

The absence of pressure at MP-10 indicates that there is no driving force that could cause gas migration over a significant distance. The methane detected at MP-10 is likely either a localized concentration or is present due to migration driven only by a concentration gradient/diffusion. Given this condition, it is unlikely that sufficient methane to present a risk to human health and safety will reach the residences. The residences adjacent to the landfill (excluding the Schrenk residence) have gas alarms and there have been no reported detections of landfill related combustible gas, indicating that these detections of combustible gas as has occurred at MP-10 do not represent a risk to the residences. At this time, no further remedial actions are proposed.

Pathway Characterization

The description of the site setting and site geology has been summarized from the EGMP. With respect to regional geology, the site is situated on the southeast edge of the Mill Creek Valley. The regional geology reflects multiple glacial advances and is consistent with a glacial outwash valley. Generally, regional geologic sequences consist of glacial valleys incised within Ordovician bedrock formations. These valley fills consist of highly variable interbedded sands, gravels, clays, silts, boulders, and cobbles.

With respect to site specific geology, the most significant feature includes a glacial till/outwash sequence which appears to form the base of the site. This unit is predominated by low permeability clays and or silts interbedded with silty sands within the areas investigated. Both oxidized and non-oxidized native materials have been found at depth, suggesting deposition in multiple sequences.

Although interbedded sands represent a potential zone of migration, those materials examined via borings were saturated and included a high percentage of silt (estimated at 40 percent or higher). As such, although classified as granular material, the potential for large scale gas transmission is seen as limited.

Along the northern perimeter of the site, the former landfill property is contiguous with several residential properties along Bank Avenue. Essentially, this area consists of a flat terrace, projecting out from the toe of the landfill slope and transitioning into the back yards of the Bank Avenue residences. This terrace was raised to its current elevation by the placement of two generations of fill. A geologic cross section along this northern perimeter is presented as Figure 2 in Attachment A. The boring logs used to prepare the cross section are presented in the EGMP. Only the log for MP-10 is included in this report in Appendix C. The fill soils, in particular the lower fill, contain hard fill and miscellaneous debris. As a result, the near surface geologic profile of this terrace is quite varied. Recent water level measurements show that the fill soil in the vicinity of MP-10 is saturated at approximately 4 feet below the ground surface. MP-10 is screened from approximately 2 to 12 feet below the ground surface, mainly across the various fill layers. The bar punch monitoring being performed at the southwest corner of the Kistner property, 437 Bank Avenue, demonstrates that the methane detected at MP-10 is not migrating toward that structure in the shallow subsurface.

As part of the delineation investigation performed in April 2013, a test pit, TP-7, was excavated in the vicinity of MP-10. The log for TP-7 is included in Appendix C. The unsaturated portion of the fill layers is the primary pathway. Geotechnical testing of this material as part of the delineation investigation showed that it can be classified as silty sand with gravel. Porosity of the soil matrix of the fill is considered to be moderate. The presence of large pieces of concrete debris within the fill results in the potential for isolated, unconnected open void space, depending on the location and orientation of the concrete debris.

Potential Causes

The exceedance at MP-10 was first detected after a major rain event. A number of theories regarding how the rain could have resulted in the exceedance were considered, including:

- Higher water levels in the waste could have resulted in the increased generation of methane.
- Higher water levels in the waste forced additional landfill gas out of the waste.
- Saturated cover soil forced methane that would otherwise have vented to the atmosphere to be forced into the soil adjacent to the landfill.
- Falling water levels after the rain event reopened a pathway in the soil and allowed additional/pent up higher concentrations of methane to reach the probe, where before the methane had dissipated, maintaining lower concentrations.

There was no practical way to determine if any of the above or some other factor was the cause of the exceedance. The methane concentration at MP-10 varied widely during the time it exceeded the threshold limit. It was not possible to directly correlate those changes to any change in conditions at the site (including precipitation, lack of precipitation, barometric pressure change, etc.), in order to attempt to understand the original cause of the exceedance or the reason for its continuation. In the end, no definitive cause could be determined with any certainty.

Should you have any questions or comments, please contact the undersigned.

Sincerely,

Randall C. Mills, P.G. Senior Project Professional

SCS ENGINEERS

James J. Walsh, P.E.

Principal

SCS ENGINEERS

cc: Chuck DeJonckheere, Hamilton County Public Health

Nick Schapman, GHD

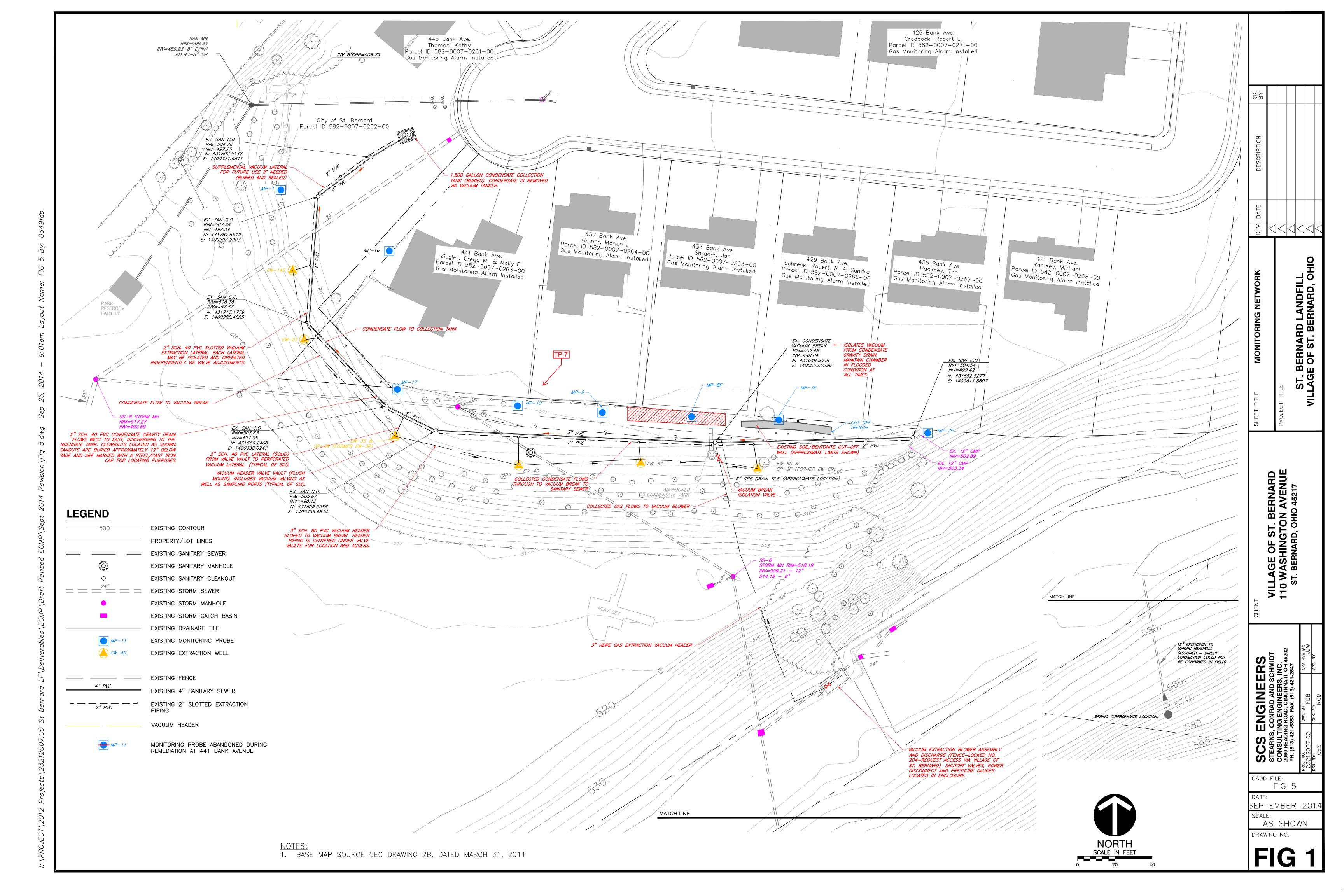
John Estep, Mayor, Village of St. Bernard

Kandall C. Mills

Tom Paul, Service Director, Village of St. Bernard

Enclosures

ATTACHMENT A FIGURES



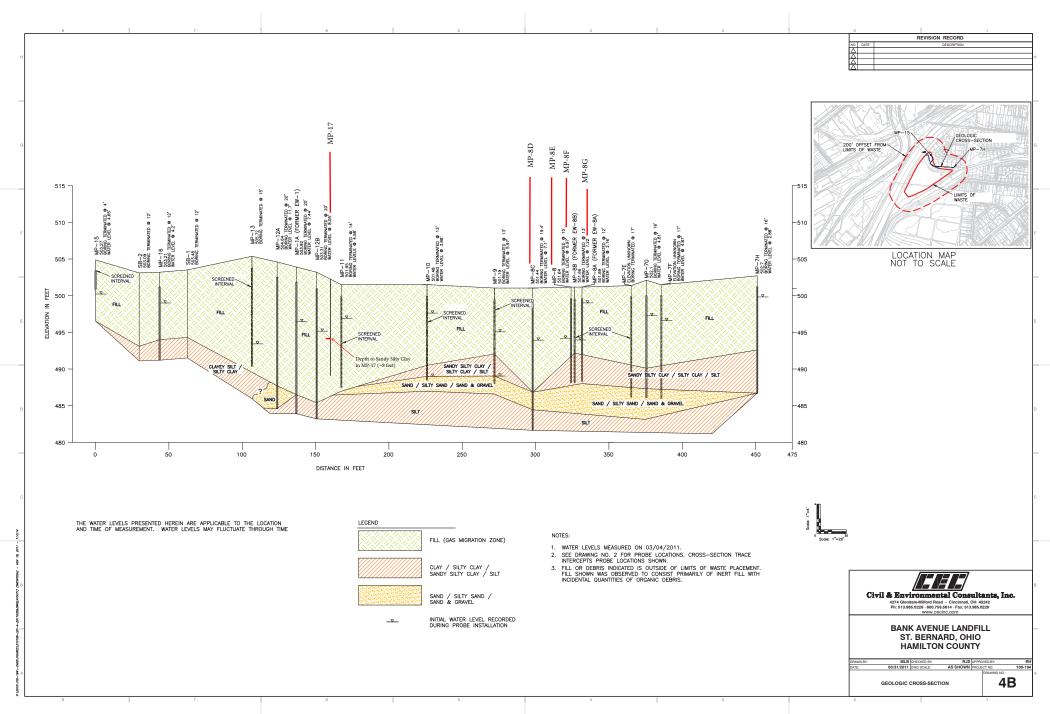


FIGURE 2. CEC 2011 Northern Geologic Cross Section

ATTACHMENT B CONTINGENCY MONITORING RESULTS

TABLE 1. SUMMARY OF CONTINGENCY MONITORING RESULTS AT MP-10 METHANE CONCENTRATION (PERCENT BY VOLUME)

	Initial Reading		Verification Reading		30-minute Evacuation Readings		Bar Punch BP-1		
Date	Initial	Sustained	Initial	Sustained	Initial	Sustained	Initial	Sustained	
06/08/17	0.2	30.5	30.0	29.1	22.0	3.9			
06/14/17	19.5	22.2	22.0	21.5	18.0	3.1			
06/21/17	22.6	23.1	22.6	21.9	19.0	3.1			
06/27/17	2.2	2.2							
07/01/17	30.1	33.5	20.0	28.3	28.3	3.8			
07/05/17	7.3	8.1	8.3	8.4	7.9	1.4			
07/12/17	37.7	38.0	36.9	38.0	23.9	0.6			
07/19/17	39.5	39.8	39.4	39.1	33.0	2.0			
07/25/17	54.4	54.9	54.4	53.5	42.9	3.4			
08/02/17	43.3	43.4	43.1	42.1	30.5	5.6			
08/09/17	7.7	7.9	7.8	7.5	6.3	0.6			
08/16/17	35.6	34.9	34.7	33.6	30.3	4.4			
08/23/17	33.1	33.7	33.3	33.6	31.9	4.5			
08/29/17	25.4	25.9	25.6	25.0	22.8	2.6			
09/07/17	49.4	49.9	49.6	48.5	37.7	4.9			
09/12/17	12.6	23.2	23.1	6.6	6.6	4.9			
09/18/17	43.2	44.8	41.5	41.9	42.1	7.4			
09/27/17	44.9	45.4	45.0	43.7	42.2	6.6			
10/03/17	21.0	21.7	21.6	21.0	19.0	2.9			
10/11/17	42.6	42.0	43.0	42.3	40.5	0.1			
10/18/17	24.9	25.2	25.1	24.5	22.7	2.9	0	0	
10/25/17	50.1	51.6	51.8	51.4	40.1	5.5	0	0	
10/31/17	14.2	14.4	14.2	14.0	10.8	0.5	0	0	
11/08/17	0	0					0	0	
11/10/17	0	0					0	0	
11/15/17	0.9	0.9					0	0	
11/17/17	0.4	0.4					0	0	

ATTACHMENT C BORING & TEST PIT LOGS

							CITY OF ST. BERNARD	JOB NO.: 200610			
Civil & Environmental Consultants, Inc.						s. Inc.		LOG OF MP-10			
	Cinc	innati. OH		F	Pittsburgh		St. Bernard, Ohio	Sheet 1 of 1			
LOGGED BY: PCS							GROUND SURFACE ELEVATION:				
DRILLER: Jersey West Brilling							TOP OF CASING ELEVATION:				
DATE DRILLED: 08/14/00							INITIAL WATER LEVEL: 12.5 ft. BGS DATE: 08/14/0				
DRILL METHOD: 4 1/4 IN. HSA							STATIC WATER LEVEL:	DATE:			
	(mdd) nNH	Recovery (in.)	Blow Counts	Elevation, MSL	Depth (ft.)	Graphic Log	Materials Description	Well Completion 8" Protective Flush Mount			
-	1.8				5-		No sample, Vapor reading from soil cuttings Gray silty CLAY w/ fine to medium sand, glass,	Slip Cap 1"Ø Sch. 40 Blank PVC Concrete Global #3 Quartz Sand 1"Ø Sch. 40			
	1.2	17	5-18 5-5		-	+ + + + + + + + + + + + + + + + + + +	concrete, metal, rubber, and fine gravel, wet in conrete fragments at 6.7 to 7 feet, very stiff (FILL) Gray silty CLAY w/ roots and black organic stains, moist, medium stiff (FILL)	Global #3 Quartz Sand			
-	0	18	1-3			+ + + + + + + + + + + + + + + + + + +	Soft				
-	1.0	22	1-1 2-1		10-	+ + + + + + + + + + +	Gray fine sandy silty CLAY w/ medium sand, moist, very soft	Slotted PVC			
-	1.9	16	1-1 1-2				Gray fine SAND, wet, very loose Boring terminated at 13 feet	(0.010) Slip Cap			
					15-						
					20-						
					25-						

Project Name: St. Bernard Landfill					SCS Project Number: 23	Tes	Test Pit No.: 7 & "L"			
Project Location: St. Bernard, Ohio					Date Started:	4/16/2013		Page 1 of _	1	
Logged H	By: R. Mil	ls			Date Completed:	4/16/2013	GW Depth (ft)	Date	Time	
Excavate	d By: Peti	·o			Sampling Method:					
Excavation	on Method	: Cat 308E			Weather:					
Backfill: excavated and off-site soil										
Total Test Pit Depth: 8 feet									<u> </u>	
Depth	Sample	Methane	PID	PID						
(ft.)	No.	Reading	Scan	Headspace						
		(%vol)	(ppm)	(ppm)*		Des	cription			
0					Approximately 0.5 fe	eet topsoil.				
					Tan soil fill: CLAY	& SILT, little Sand, lit	ttle Gravel, moist, with	occasional bri	ck	
1				1.5	fragments and small	pieces of metal. Less t	han 5% non-soil debris			
						•				
2										
		0	0.4		At approximately 2.4	feet, grev soil fill: SI	LT & CLAY, some to 1	ittle Sand, littl	le Gravel	
3		Ü	0.1			• •	ts, slight petroleum odd		io Graver,	
					Tire encountered at 3	-	0% non-soil debris.	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,		
4					The encountered at .	<i>5</i> to 1	070 Holl-soll deolls.			
4										
5				0	Eili in also de a alaba a d		of most of most of most of	4h.:		
3				8		concrete, small pieces	of rusted metal, metal	tubing, road si	ign,	
				0.4	car mirror.					
6					2nd tire and inner tu	be in initial test pit.				
7					Approximately 6 foo	t square slab of concre	te in west end of "L" at	7.5 feet.		
8					At 8 feet, native soil	olive grey Clayey SII	LT, some fine Sand, son	ne organic ma	tter.	
 9					Dotto:	toot mit at 0.5 fact				
9					Bottom of	test pit at 8.5 feet.				
10										
10										
11					Ī					

^{*} Unless otherwise indicated, headspace samples were collected from excavated soil fill stockpile prior to backfilling.