SCS ENGINEERS

November 10, 2016 File No. 23212007.04

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

Subject:

Village of St. Bernard Landfill

MP-10 Contingency Monitoring 2nd 30-day Report

Dear Ms. Buchanan:

Per the approved EGMP for the above referenced site, every 30 days from the date of initial detection above threshold limits, until contingency monitoring plan discontinuation criteria are met, the owner/operator will submit a report to the Ohio EPA and Hamilton County Public Health containing:

- a. Analysis and summary of the results from the contingency monitoring including the lateral extent of explosive gas concentrations above the threshold limit and a characterization of explosive gas pathways. Characterization, based on visual inspection, of the pathways will include the degree of saturation and porosity (textural classification or fracturing) within the pathways and the possible causes of the increase in gas concentrations such as landfill operational procedures, gas control system failure or upset, climatic conditions, or other activities being conducted on or near the site.
- b. A summary of the steps taken to ensure protection of human health and the environment and an analysis of their effectiveness.

This letter serves as the second 30-day report. A site map is presented as Figure 1 in Attachment A.

Analysis and Summary

The results of the contingency monitoring performed to date are summarized in the table included in Attachment B. Following the initial and verification sampling for the last three events, MP-10 has been pumped for 30 minutes, at a rate of approximately 550 cc/min., using the GEM 5000. Approximately 25 casing volumes are being removed from MP-10 each time. The falling methane concentration during the 30 minute purge indicates that the elevated concentration of methane is present in a small area, i.e. only a small volume of soil gas with an elevated concentration of methane is present.

The monitoring results for the last four to five weekly contingency monitoring events show the concentration of methane at MP-10 generally decreasing. The concentration is below the peak reading observed on September 21, 2016. The absence of pressure at MP-10 indicated that there

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is no driving force that could cause gas migration to the nearby residents, which are also monitoring with indoor combustible gas indicators. The methane detected at MP-10 is likely a localized concentration or is present due to migration driven by a concentration gradient/diffusion. 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 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. The log for MP-10F 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 varied. The fill soil matrix in the vicinity of MP-10 is a sandy silt or sandy clay. The presence of the hard fill and debris likely increases the porosity and results in a porosity that approaches that typically assumed for granular soils, i.e. 25 percent. 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.

As part of the delineation investigation conducted in 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 layer 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.

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Possible Causes of Exceedance

Just prior to the detection of the initial exceedance at MP-10 on September 7, 2016, the St. Bernard area experienced an extreme storm event, ranging in intensity from a 100 to a 500 year rain event. The infiltration into the landfill of significant quantities of water could have displaced methane in the landfill into the pathway monitored by MP-10. Alternatively, the additional water that infiltrated into the landfill could have resulted in an increase in the generation of methane, some of which reached MP-10.

Summary of the Steps Taken to Protect Human Health and the Environment

The collection and control system was adjusted to apply additional vacuum to the segments in the vicinity of MP-10, specifically those monitored by EW-3S and EW-4S. This was done by reducing vacuum on the other segments in the system. MP-10 will continue to be pumped for 30 minutes, at a rate of approximately 550 cc/min., using the GEM 5000 after the initial and verification monitoring. Approximately 25 casing volumes will be removed from MP-10 each time. This appears to have a beneficial effect in reducing the concentration of the landfill gas present in the vicinity of MP-10.

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

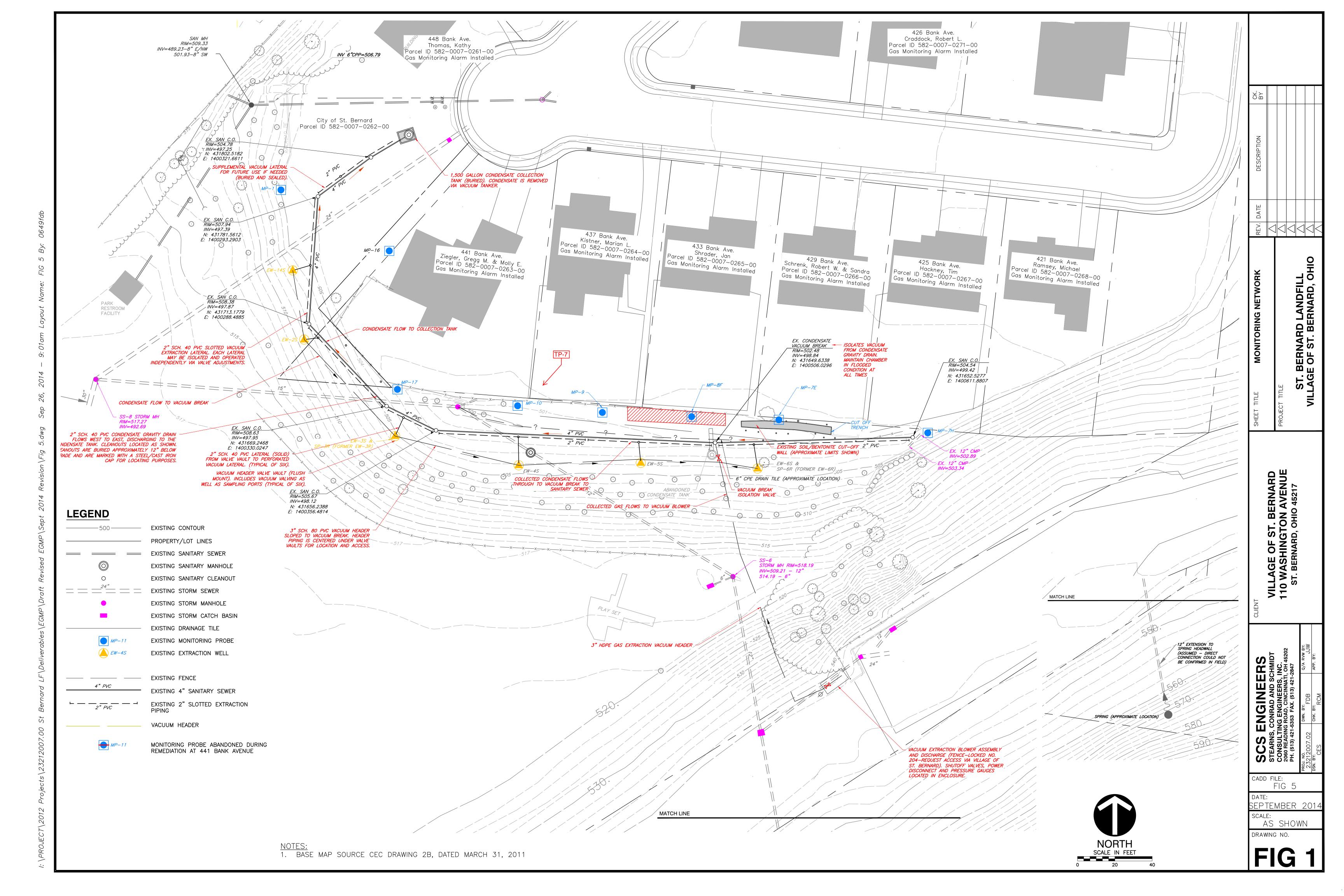
Nick Schapman, GHD

Candall Cmills

John Estep, Mayor, Village of St. Bernard

Enclosures

ATTACHMENT A FIGURES



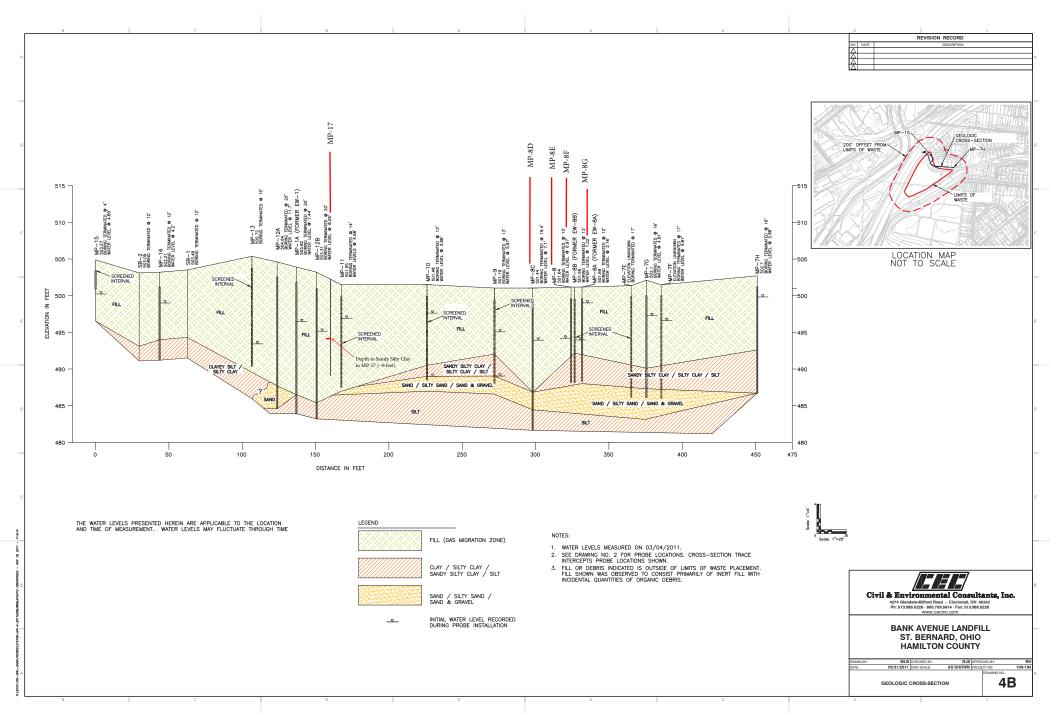


FIGURE 2. CEC 2011 Northern Geologic Cross Section

ATTACHMENT B CONTINGENCY MONITORING RESULTS

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

| | Initial F | Reading | Verificatio | on Reading | 30-minute Evacuation Readings | | |
|----------|-----------|-----------|-------------|------------|----------------------------------|-----------|--|
| Date | Initial | Sustained | Initial | Sustained | Initial | Sustained | |
| 09/07/16 | 46.6 | 46.8 | 36.3 | 41.8 | | | |
| 09/14/16 | 48.2 | 48.4 | 37.3 | 43.0 | | | |
| 09/21/16 | 55.8 | 56.3 | 45.9 | 49.3 | | | |
| 09/29/16 | 10.8 | 23.3 | 6.5 | 15.9 | | | |
| 10/04/16 | 48.1 | 49.5 | 38.8 | 43.0 | | | |
| 10/13/16 | 44.3 | 46.8 | 41.4 | 39.2 | | | |
| 10/19/16 | 44.3 | 42.0 | 35.0 | 46.6 | 19.5 | 22.0 | |
| 10/27/16 | 39.2 | 39.9 | 39.2 | 38.6 | 28.5 | 5.8 | |
| 11/02/16 | 28.3 | 28.7 | 20.7 | 27.1 | 27.0 | 3.8 | |

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: 08/14/00 | | | |
| 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 | Logged By: R. Mills | | | | 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.