

December 4, 2020
File No. 23212007.08

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

Subject: Closed St. Bernard Landfill, Addendum to the Request for Extension of the Blower Shutdown Test

Dear Ms. Lammers:

This letter is an addendum to our November 30, 2020 letter that requested an extension of the blower shutdown test. This letter provides the clarification of the contingency monitoring to be performed under the blower shutdown test as requested by Ohio EPA. Revised Items 6 and 7 of the approved Work Plan for the Blower Shutdown Test, dated April 16, 2020, are presented below to clarify the contingency monitoring sequence.

6. If, at any time during the above monitoring, a reading at or above 5 percent combustible gas occurs in a compliance probe, a verification reading will be performed immediately. If the initial verification reading remains at or above 5 percent combustible gas, a second verification reading will be collected the next day. Monitoring will occur no less frequently than weekly until sustained concentrations of less than 5 percent by volume combustible gas in the impacted probe are recorded for a minimum of four sequential monitoring events, over a minimum period of two weeks. The Combustible Gas Indicators (CGIs) present in the majority of the residences adjacent to the landfill provide sufficient protection to the residents to allow an exceedance to a probe to persist during the test in order to determine whether or not the exceedance is due to a short term change in (seasonal) conditions and not due to the shutdown of the blower.
7. If at any time during the test Ohio EPA wants the gas system turned back on due to readings at or above 5 percent combustible gas, the gas system will be turned on.

The language in Item 6 above is consistent with the approved Explosive Gas Monitoring Plan for the closed St. Bernard Landfill and OAC 3745-27-12 (E)(5)(e).



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Sincerely,

Handwritten signature of Randall C. Mills in blue ink.

Randall C. Mills, P.G.
Senior Project Scientist
SCS Engineers

Handwritten signature of James J. Walsh in black ink.

James J. Walsh, P.E.
Principal
SCS Engineers

RCM/JJW

cc: Nick Schapman, GHD
Jonathan Stuchell, Mayor Village of St. Bernard
Tom Paul, Service Director Village of St. Bernard
Heidi Culbertson, Village of St. Bernard
Dylan Dyer, Ohio EPA SWDO
Chuck DeJonckheere, R.S., Hamilton County Public Health