

November 30, 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, Request for Extension of the Blower Shutdown Test

Dear Ms. Lammers:

The Village of St. Bernard (Village) is proposing that the duration of the blower shutdown test be extended to allow for the collection of additional data in support of an application for permanent shutdown of the blower/operation of the gas control system. Based on our discussion during the November 17, 2020 conference call, Ohio EPA expressed concern about having sufficient data to approve the Village's application to suspend operation of the gas control system with regard to the quantity of data collected to-date. To be clear, should Ohio EPA approve the Village suspension of operations of the gas control system following this test, the Village has no plans at this time to request cessation of explosive gas monitoring at the landfill. On the contrary, the semi-annual monitoring and maintenance of the compliance probes and annual calibration of the CGIs in nearby homes will continue until such time we feel Ohio EPA's explosive gas monitoring cessation requirements can be met.

Following the last planned monthly monitoring event for the original 6 month duration of the blower shutdown test (scheduled for early December), the Village proposes that the blower will remain shut down and quarterly monitoring will be performed on the following schedule over the 2021 calendar year: March, June, September, and December. Per the June 16, 2020 approved protocol for the blower shutdown test, either the Village may end the test and revert to regular blower operations or Ohio EPA can direct the end of the test and have the blower returned to regular operations at any time. Unless Ohio EPA approval for permanent shutdown of the blower is received following collection of additional data and submission to shut down the blower, the blower will be restarted and semi-annual compliance monitoring will resume at the end of the test, whenever that occurs.

SCS feels that quarterly monitoring is sufficient to characterize conditions during the four seasons. As can be seen in the attached table, the exceedances that have occurred over the past 6 years have occurred in the months of September or December. No exceedances have occurred during the first or second quarters during the past 6 years.



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The Village requests approval of this request to extend the duration of the blower shutdown test, so the monitoring can continue. Please contact Nick Schapman, GHD, or the undersigned if you have any questions. Please know that the Village's representatives are available to meet with Ohio EPA to discuss this proposed modification to the current approved blower shutdown test protocol.

Sincerely,



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



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

**TABLE 1. COMBUSTIBLE GAS EXCEEDANCE SUMMARY  
CLOSED ST. BERNARD LANDFILL**

Compliance Probes	2012												2013												2014												
	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	
MP-1	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
MP-7E	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	7.3	5.9	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
MP-7H	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
MP-8F (new in 2012)																							10.9	-													
MP-9	-	-	-	-	-	-	-	11	38.5	50.7	22.1	-	-	-	-	-	-	-	5.1	-	5.3	12	-	-	-	-	-	-	-	-	-	-	-	-	-	15	-
MP-16	-	-	-	-	-	-	-	6.5	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
MP-17 (new in 2014)																																					

Compliance Probes	2015												2016												2017												
	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	
MP-1	-	-	-	-	-	-	-	-	-	-	-	-						-						-						-							
MP-7E	-	-	-	-	-	-	-	-	-	-	-	-						-						-						-					9.7		
MP-7H	-	-	-	-	-	-	-	-	-	-	-	-						-						-						-							
MP-8F	-	-	-	-	-	-	-	-	-	-	-	9.7	-	-	-	-	-	-	-	-	-	-	-	-						-							
MP-9	-	-	-	-	-	-	-	-	-	-	-	-						-						6.4						-							
MP-16	-	-	-	-	-	-	-	-	-	-	-	-						-						-						-							
MP-17 (new in 2014)	-	-	-	-	-	-	-	-	-	-	-	-						-						-						-							

Compliance Probes	2018												2019												2020											
	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D
MP-1			-			-					-				-			-					-			-			-							
MP-7E			-			-					-				-			-					-			-			-					12.6		
MP-7H			-			-					-				-			-					-			-			-							
MP-8F			-			-					-				-			-					-			-			-							
MP-9			-			-					-				-			-					-			-			-					30.9		
MP-16			-			-					-				-			-					-			-			-							
MP-17			-			-					-				-			-					-			-			-							

**Notes:**

Numeric values shown in charts above represents maximum methane concentrations (percent by volume) for the month, when equal to or greater than 5% Explosive Gas Threshold Limit.

- = methane concentration (percent by volume) less than 5% Explosive Gas Threshold Limit.