SCS ENGINEERS

December 18, 2017 File No. 23212007.05

Submitted Electronically

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

Subject: Village of St. Bernard Landfill Request to Remove MP-10 from the Monitoring Network

Dear Ms. Buchanan:

With this letter, the Village of St. Bernard is requesting that gas probe MP-10 be removed from the monitoring network at the closed St. Bernard Landfill. The background information and the rationale for this request are presented below. If this request is approved, a revised monitoring network table and drawing will be submitted to update the facility's Explosive Gas Monitoring Plan (EGMP).

Background

The location of MP-10 is shown on Figure 1 in Attachment A. It is near the boundary between the properties at 441 and 437 Bank Avenue. A boring log with the as-built construction of MP-10 is presented in Attachment B. MP-10 is screened from approximately 2 to 12 feet below ground surface. The materials screened include fill from 5 to 11 feet below ground surface. As can be seen in Figure 1, MP-10 is located near the waste limits. MP-10 is also near a storm water inlet that provides for a concentration of storm water flow in the area and creates a wet, boggy condition at times due to the increased infiltration in the vicinity of MP-10.

From September 2016 through October 2017, MP-10 has experienced two periods, ranging from approximately 4 to 5 months in duration, when the readings at the probe exceeded the 5 percent threshold value. Prior to September 2016, the last exceedance at MP-10 occurred in September 2012. No specific cause or causes for these periods of exceedance have been identified, although each began shortly after a large precipitation event.

Rationale

Contingency monitoring at MP-10 during the periods of exceedance has included performing a reading after the GEM 5000 was used to evacuate the probe for 30 minutes at a rate of 550 cc/min (removing a volume of approximately 0.50 cubic feet). The significant decrease in combustible gas concentration after the purging, often achieving a final reading below 5% methane, demonstrates that the source of combustible gas is likely either a localized concentration or is present due to migration driven only by a concentration gradient/diffusion.

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Given this condition and observations to-date, there is insufficient methane volume to present a risk to human health and safety for the nearby residences. The residences adjacent to the landfill (excluding the Schrenk residence at 429 Bank Avenue) have combustible gas indicators and there have been no reported alarms/detections of landfill related combustible gas, indicating that these short term detections of combustible gas at MP-10 do not represent a risk to the residences. In addition, bar punch monitoring was performed in the southwest corner of the 437 Bank Avenue property (5 to 10 feet north northeast of MP-10) during the eight most recent monitoring events in and following the latest period of exceedance (contingency or quarterly events). The results of the bar punch monitoring was zero percent combustible gas, demonstrating that combustible gas was not present in the shallow subsurface between MP-10 and the 437 Bank Avenue residence.

The monitoring network without MP-10 is shown on Figure 2 in Attachment A. By removing MP-10, an average spacing between the probes would increase only slightly from 61 to 73 feet and the maximum distance between probes would increase only slightly from approximately 83 to 113 feet. There remains at least one probe between the landfill and each of the residences that abut the landfill.

Summary

The combustible gas occasionally detected at MP-10 is a localized phenomenon that does not present a threat to the nearby residences. It is SCS's professional opinion that the proposed monitoring network, excluding MP-10, provides adequate protection for the residences adjacent to the closed St. Bernard Landfill. If the removal of MP-10 from the monitoring network is approved, it will no longer be monitored and will be abandoned as soon as practical in early 2018.

If you have any questions or need additional information, please contact us.

Sincerely,

Randall C mills

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

RCM/JJW

cc Nick Schapman, GHD Tom Paul, Village of St. Bernard John Estep, Village of St. Bernard

Attachments

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

ATTACHMENT A

FIGURES





ATTACHMENT B

BORING LOG

Civil & Environmental Consultants, Inc. Cincinnati, OH (513) 985-0226 • (800) 759-5614 (412) 921-3402 • (800) 365-2324						CITY OF ST. BERNARD St. Bernard, Ohio	JOB NO.: 200610	
							LOG OF MP-10 Sheet 1 of 1	
ATE DRILLED: 08/14/00						INITIAL WATER LEVEL: 12.5 ft. BGS	DATE: 08/14/00	
RILL METHOD: 4 1/4 IN. HSA						STATIC WATER LEVEL:	DATE:	
(mad) iiNH	Recovery (in.)	Blow Counts	Elevation, MSL	Depth (ft.)	Graphic Log	Materials Description	Well Completion 8" Protective Flush	
1.8	3 2 17 1 18 0 22 9 16	5-18 5-5 1-3 4-4 1-1 2-1 1-1 1-2		5- 5- 10-		Gray silty CLAY w/ fine to medium sand, glass, 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) Soft Gray fine sandy silty CLAY w/ medium sand, moist, very soft Gray fine SAND, wet, very loose Boring terminated at 13 feet	Slip Cap 1'Ø Sch. 40 Blank PVC Concrete Global #3 Duartz Sand 1'Ø Sch. 40 Concrete 	
				20-				