



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Eric J. Holcomb
Governor

Brian C. Rockensuess
Commissioner

June 27, 2024

VIA EMAIL gary.burton@owencounty.in.gov; bob.curry@owencounty.in.gov;
dale.dubois@owencounty.in.gov

Owen County Commissioners
Owen County Landfill
Owen County Courthouse
60 South Main Street
Spencer, IN 47460

Re: *Patricksburg Owen County Landfill April 2024 Statistical Evaluation Groundwater Monitoring Report*
Dated May 31, 2024
VFC # Pending
Owen County Landfill
Owen County
SW Program ID 60-02

Dear Commissioners:

On June 6, 2024, we received the *Patricksburg Owen County Landfill April 2024 Statistical Evaluation Groundwater Monitoring Report* (Report) from AECOM on behalf of the facility. The following comments are the result of our review.

The Report and sampling event generally comply with 329 IAC 10-21 and the groundwater monitoring requirements in the *Approval of Landfill Closure Plan, Post-Closure Plan, and Funding for Closure and Post-Closure Care, FP 60-02* dated September 23, 1998 (VFC # [27605162](#)), and the *Statistical Evaluation Plan for Closure/Post-Closure Ground Water Monitoring at the Owen County Landfill* (StEP) dated January 28, 1999 (VFC # [27591446](#)); with the exceptions in the first two bullet points.

- The Report documents that the facility averaged the results from downgradient groundwater monitoring well MW-5 and the field duplicate sample taken at MW-5 and compared the average result to the statistical limit.

We are not clear on why the facility averaged the initial and duplicate results and compared the averaged result to the constituent's statistical limit. The facility's StEP does not document that the facility averages the first sample result and the field duplicate result, nor does the Report include justification. In addition, 329 IAC 10-21-2(b)(7)(C)(BB) states, "the ground water quality results for the



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additional sample [field duplicate] are not used in the statistical evaluation, unless approved by the commissioner.” Therefore, the facility must not average the first sample result and the field duplicate result, unless the facility submits justification to average the results and we approve.

- The Report states in section 2.4 *Groundwater Monitoring Parameters* “...the dissolved metals sample collected at [downgradient groundwater monitoring well] MW-4 was not analyzed by the laboratory for barium, cobalt, lithium, nickel, and zinc during the April 2024 monitoring event.” However, the Report does not provide an explanation as to why the laboratory did not analyze the dissolved metals sample for the listed parameters (constituents). Therefore, the facility needs to resample MW-4 for the dissolved metals the laboratory did not analyze for and submit the results following 329 IAC 10-21-1(s), since the dissolved metals are part of the established assessment groundwater monitoring program (329 IAC 10-21-10) at MW-4.
- Please note that we have changed the process for submitting IDEM’s electronic data files (EDF). Therefore, unless otherwise notified, please submit future EDFs to geologydata@idem.in.gov. Please submit all future EDFs to this email address and please carbon copy Mr. Scott Beard of my staff on the submittal email.

The facility needs to continue the established detection and assessment groundwater monitoring programs described in 329 IAC 10-21-7 and 329 IAC 10-21-10, respectively.

Thank you for your attention to this matter. If you have questions, please contact Mr. Beard at sbeard@idem.IN.gov or call (317) 233-6644.

Sincerely,



John A. Guerrettaz, LPG
Chief, Geology Section
Permits Branch
Office of Land Quality

cc: Mr. John Reeves, Owen County Health Department
Owen County Solid Waste Management District
Ms. Juliana Fracetti, Solid Waste Permits Section, OLQ, IDEM
Mr. J. Andrew Duwelius, AECOM

From: [McCormick, Debra J](#)
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Bcc: [Beard, Scott](#)
Subject: 06272024 SW 60-02 Owen County
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Attachments: [image001.png](#)
[image002.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)
[Owen County 60-02 1st 2024 SA GWMR Review Letter Final.pdf](#)
[image008.png](#)

Attached is the letter for the SW ID# 60-02 for Owen County . If any questions contact Mr. Scott Beard, this information is in the last paragraph above Mr. John Guerrettaz signature block.



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