



Environmental
Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

Re: GMPT Landfill, Defiance County
Ground Water

October 12, 2011

Mr. Chuck Renn
Environmental Engineering
General Motors Powertrain
26427 State Route 281 East
Defiance, Ohio 43512

Dear Mr. Renn:

On July 13, 2011, the Ohio Environmental Protection Agency (Ohio EPA), Division of Materials and Waste Management (DMWM), Northwest District Office (NWDO) received the April 2011, Semi-annual Statistical Evaluation of Ground Water Monitoring Data, for the General Motors Powertrain (GMPT) Residual Waste Landfill. The submittal was dated July 11, 2011 and was reviewed to determine compliance with Ohio Administrative Code (OAC) Rule 3745-30-08.

COMMENTS

Violations

- GMPT-Defiance continues to be in violation of OAC Rules 3745-30-08(C)(6)(f) and (C)(5) regarding its methods of statistical analysis. To return to compliance with these rules, GMPT-Defiance needs to revise the statistical analysis procedures for sulfate and TDS to control or correct for spatial variability. Ohio EPA is aware that GMPT-Defiance is currently working to resolve this issue.**

OAC Rule 3745-30-08(C)(6)(f) requires that the statistical method, if necessary, include procedures to control or correct for spatial variability in the data. OAC Rule 3745-30-08(C)(5) requires that the statistical method ensure protection of human health and safety and the environment and to comply with the performance standards outlined in OAC Rule 3745-30-08(C)(6). Note that the technical issues regarding statistical analyses and their applications to these rules were extensively discussed in the May 6, 2008 letter from Ohio EPA, but are not reiterated herein.

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The May 6, 2008, letter from Ohio EPA cited GMPT-Defiance in violation of OAC Rules 3745-30-08(C)(6)(f) and (C)(5) regarding its methods of statistical analysis for iron, sulfate and TDS. Specifically, considering the high degree of spatial variability in the upgradient concentrations of these parameters that GMPT-Defiance was not using procedures to control or correct for this spatial variability.

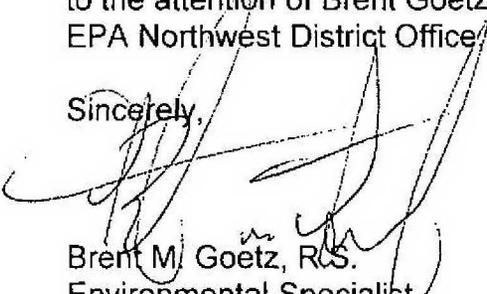
Subsequently, GMPT-Defiance has begun performing intra-well statistics for the iron data from the facility (which corrects for the spatial variability observed for iron data). Therefore, this issue does not currently apply to the iron data for the facility.

However, the statistical analysis procedures for sulfate and TDS have not been revised to control or correct for spatial variability. Therefore, GMPT-Defiance continues in to be violation of OAC Rules 3745-30-08(C)(6)(f) and (C)(5) regarding its methods of statistical analysis for sulfate and TDS.

As discussed in recent meetings with Ohio EPA, GMPT-Defiance is currently working to resolve this issue.

If you have any questions please feel free to contact Ken Brock at the Ohio EPA Northwest District Office (419-373-3143). Any written correspondence should be sent to the attention of Brent Goetz, Division of Materials and Waste Management, Ohio EPA Northwest District Office, 347 N. Dunbridge Road, Bowling Green, Ohio 43402.

Sincerely,



Brent M. Goetz, R.S.
Environmental Specialist
Division of Materials and Waste Management

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pc: Tamara Moorman, Haley & Aldrich
~~NWDO File: DMWM-SW, Defiance County, GMPT Landfill, Ground Water~~

ec: Jack Leow, DDAGW, NWDO
Ken Brock, DDAGW, NWDO
Mike Reiser, DMWM, NWDO

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