



State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Road
Bowling Green, OH 43402-9398

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Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

Re: GMPT Landfill, Defiance County
Ground Water

October 16, 2008

Mr. Chuck Renn
Environmental Engineering
General Motors Powertrain
P. O. Box 70
Defiance, Ohio 43512-0070

Dear Mr. Renn:

On October 2, 2008, the Ohio Environmental Protection Agency (Ohio EPA), Division of Solid and Infectious Waste Management (DSIWM), Northwest District Office (NWDO) received ground water sample results (dated September 30, 2008) for monitoring well MW-11DR at the General Motors Powertrain Landfill (facility) in Defiance County. The submittal was reviewed to determine compliance with Ohio Administrative Code (OAC) Rule 3745-30-08. Ohio EPA's comments are below.

COMMENTS

Violations

1. **As stated recently in the September 26, 2008 letter from Ohio EPA, GMPT – Defiance is in violation of OAC Rule 3745-30-08(B)(3)(e) regarding the operation and maintenance of MW-11DR. To return to compliance, MW-11DR needs to be properly abandoned.**

OAC Rule 3745-30-08(B)(3)(e) requires that *"The monitoring wells ... shall be operated and maintained to perform to design specifications throughout the life of the ground water monitoring program."*

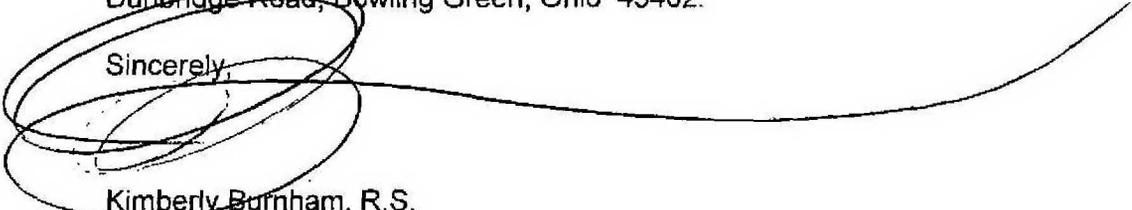
Regarding MW-11DR, the August 19, 2008 letter from GMPT – Defiance stated *"GMPT – Defiance agrees that there is grout contamination that will correct itself in time when there is sufficient production to flush out the affected screened area."* Regardless of whether or not the grout contamination will correct itself in time (it may or may not), MW-11DR is not being operated and maintained to perform to design specifications. Therefore, the requirements of OAC Rule 3745-30-08(B)(3)(e) are not being met for MW-11DR.

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During the April 2008 sampling event, the initial pH reading at MW-11DR was 9.71 S.U. and fell to 8.44 S.U. by the time of sampling. During the July 2008 sampling event, the initial pH reading at MW-11DR was 10.32 S.U. and fell to 8.18 S.U. by the time of sampling. During the September 2008 sampling event, the pH readings at MW-11DR fluctuated between 8.03 and 10.44 S.U. These high pH values of the purge water are a strong indication of grout contamination.

If you have any questions, please feel free to contact Ken Brock of our office at (419)373-3143. Any written correspondence should be sent to the attention of Kimberly Burnham, Ohio EPA, Northwest District Office, Division of Solid & Infectious Waste Management, 347 North Dunbridge Road, Bowling Green, Ohio 43402.

Sincerely,



Kimberly Burnham, R.S.
Environmental Specialist
Division of Solid & Infectious Waste Management

/cs

pc: Tamara Moorman, RMT, Inc.
~~DSIWM, NWDO File: Defiance County, GMP, Landfill, Ground Water~~

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

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