



**Environmental  
Protection Agency**

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

Re: General Motors Casting Operations  
Defiance County  
Notice of Violation

March 7, 2012

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

Dear Mr. Renn:

On January 9, 2012, the Ohio Environmental Protection Agency (Ohio EPA) received a document titled "*October 2011 Semiannual Statistical Evaluation of Groundwater Monitoring Data*" for the General Motors Casting Operations Residual Solid Waste Landfill.

The submittal was dated January 6, 2012, and documented the statistical evaluation of ground water monitoring data for the October 25-27, 2011, annual sampling event at General Motors Casting Operations. Ohio EPA Reviewed the submittal for compliance with Ohio Administrative Code (OAC) Rule 3745-30-08.

## COMMENTS

### Violations

1. **General Motors Casting Operations 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, General Motors Casting Operations needs to revise the statistical analysis procedures for sulfate and TDS to control or correct for spatial variability. Ohio EPA is aware that General Motors Casting Operations 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.

The May 6, 2008, letter from Ohio EPA cited General Motors Casting Operations 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 General Motors Casting Operations was not using procedures to control or correct for this spatial variability.

Subsequently, General Motors Casting Operations 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, General Motors Casting Operations 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.

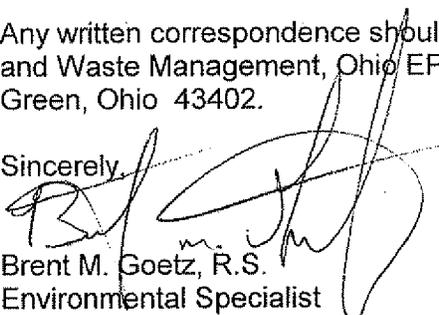
Correspondence between Ohio EPA and General Motors Casting Operations has been ongoing regarding the above violation. In an effort to resolve the above violation, General Motors Casting Operations and Ohio EPA personnel have had several technical meetings since August 2010. Ohio EPA is currently awaiting response from General Motors Casting Operations regarding issues discussed during a November 17, 2011, technical meeting.

General Motors Casting Operations needs to immediately take the necessary measures to return to compliance with Ohio's environmental laws. Within 14 days of receipt of this letter, General Motors Casting Operations is requested to provide documentation to this office including the steps that will be taken to abate the violation cited above. Documentation of steps taken to return to compliance includes written correspondence, updated policies, and photographs, as appropriate, and may be submitted via the postal service or electronically to [Brent.Goetz@epa.ohio.gov](mailto:Brent.Goetz@epa.ohio.gov).

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

/l/r

pc: Tamara Moorman, Haley & Aldrich  
NWDO File: DMWM-SW, Defiance County, GMPT Landfill, Ground Water  
ec: Tim Fishbaugh, DDAGW, NWDO  
Ken Brock, DDAGW, NWDO  
Mike Reiser, DMWM, NWDO  
id #: 5-11195

Please be advised that the violation cited above will continue until the violation has been properly abated. Failure to comply with Chapter 3734 of the Ohio Revised Code and rules promulgated thereunder may result in a civil penalty of up to \$10,000 per day for each violation. It is imperative that you return to compliance. If circumstances delay the abatement of violations, the owner/operator General Motors Casting Operations is requested to submit written correspondence of the steps that will be taken by date certain to attain compliance.