

F
276.08
#2.04



Transmitted Via FedEx

October 13, 1999

Mr. Allan Brouillet
Environmental Response Division
Michigan Department of Environmental Quality
Saginaw Bay District
503 North Euclid Street
Bay City, MI 48706

Re: Annual Progress Report – March 1998 to September 1999
General Motors Corporation Saginaw Malleable Iron Plant Property and
REALM Inc. Green Point Landfill and Drum Remediation Area,
Saginaw, Michigan
BBL Project #: 0276 276.08 #2.06

Dear Mr. Brouillet:

This progress report presents a summary of the work activities conducted during the period from March 1998 through September 1999 for the above-referenced site, and a summary of the work activities scheduled for the following 12 months. This report was prepared in accordance with the reporting requirements specified in the Consent Judgment executed between the Michigan Department of Environmental Quality (MDEQ), the Michigan Attorney General's Office, the General Motors Corporation (GM), and Waste Management Inc. (WMI) that was entered by the State of Michigan Circuit Court on March 16, 1998.

Significant RI/FS Activities and Events

The following is a summary of the significant Remedial Investigation/Feasibility Study (RI/FS) activities completed in the period from March 16, 1998 through September, 1999. Please note that as discussed with Ms. Susan Kaelber-Matlock (MDEQ), due to the recent submittal of the *Remedial Investigation Report* (BBL, January 1999b), and several supplemental investigation reports, sampling results and data have not been reproduced as attachments to this Annual Progress Report.

Background Groundwater Quality Assessment Report

- A *Background Groundwater Quality Assessment Report* was submitted to the MDEQ on October 9, 1998 (BBL, October 1998b).
- In March 1999, GM received comments from MDEQ on this report (Stone, December 1998).
- GM, BBL, and the MDEQ participated in a conference call on April 21, 1999 to discuss the comments on the Background Groundwater Quality Assessment Report.
- A letter responding to MDEQ comments was transmitted to the MDEQ on July 7, 1999 (BBL, July 1999b).
- The MDEQ acknowledged that GM has addressed the MDEQ comments on the Background Groundwater Quality Study presented in the December 18, 1998 letter (Brouillet, July 1999).

Driveway Expansion Investigation Activities

- A Work Plan to address the detection of polychlorinated biphenyls (PCBs) in soil removed during the expansion of the driveway that enters the plant property was transmitted to the MDEQ on August 4, 1998 (BBL, August 1998a).
- The MDEQ approved the Work Plan in a letter to GM dated August 14, 1998 (Brouillet, August 1998a).
- A series of surface soil samples were collected during the week of October 5, 1998, to address the detection of PCBs in soil removed during the expansion of the driveway that enters the property, as described in the Work Plan (BBL, August 1998a). The preliminary analytical data (prior to the completion of QA/QC data review) were attached to the October 1998 monthly report (BBL, November 1998).
- A letter report presenting the results of the surface soil sampling activities completed to investigate the previous detections of PCBs in soil removed during expansion of the driveway that enters the property was sent to the MDEQ on February 12, 1999 (BBL, February 1999b). As indicated in the letter report, no additional PCB detections were noted, and therefore no additional sampling is necessary.
- The MDEQ has since acknowledged that no additional sampling is required (Brouillet, July 1999).

Stormwater Pond Investigation Activities

- Youngs Environmental, Inc. conducted field activities during June and July 1998 to clean, slip line, and grout the annulus of the new slip line of a portion of the 42-inch storm water line that extends through the Light Non-Aqueous Phase Liquid (LNAPL) Assessment and Remediation. Area located south of the Saginaw Malleable Iron (SMI) Plant building. During field activities, oily material was observed in the Stormwater Pond. The line repair was completed on July 30, 1998 (BBL, April 1999b).

- The oily material was tested, and found to contain 25.4 parts per million (ppm) PCB.
- A Work Plan to address the detection of PCBs in oil that had migrated to the Stormwater Pond was transmitted to the MDEQ on August 4, 1998 (BBL, August 1998b). A revision to this document was transmitted to the MDEQ on August 6, 1998 (BBL, August 1998c).
- The Work Plan was approved, contingent on several modifications, in a letter from the MDEQ to GM dated August 14, 1998 (Brouillet, August 1998b).
- A series of sediment, LNAPL, groundwater, and surface water samples were collected during the week of October 5, 1998, to address the detection of PCBs in oil that had migrated to the Stormwater Pond. The work was completed as described in the Work Plan (BBL, August 1998b,c), as modified by a letter from the MDEQ to GM (Brouillet, August 1998b).
- Analytical results were transmitted to the MDEQ in the October 1998 monthly report (BBL, November 1998).
- A letter report summarizing the Stormwater Pond investigation activities was submitted to the MDEQ on April 14, 1999 (BBL, April 1999b).

Railyard/Unpaved Area Surface Soil Activities

- A letter presenting the results of supplemental surface soil sampling in the Railyard and the Unpaved Area, and recommendations for additional sampling and excavation activities was submitted to the MDEQ on April 14, 1998 (BBL, April 1998c).
- A letter from the MDEQ dated April 27, 1998 was received by GM, which provided comments on the proposed scope of work for excavation activities within the Railyard and the Unpaved Area (Brouillet, April 1998).
- A letter dated May 12, 1998 was transmitted to the MDEQ (BBL, May 1998b), which presented responses to the comments received from the MDEQ (Brouillet, April 1998) on the proposed excavation activities for the Railyard and the Unpaved Area (BBL, April 1998c).
- A letter dated June 8, 1998 was received from the MDEQ (Kaelber-Matlock, June 1998b), which granted approval for the proposed excavation of surface soils in the Railyard and the Unpaved Area of the GM SMI site. The approved scope of work is described in a letter (BBL, April 1998c), as modified by a second letter submittal dated (BBL, May 1998b).
- Surface soil was excavated on July 14, 1998 from an area in the Railyard and a second area within the Unpaved Area due to the detection of PCBs at concentrations above the MDEQ Generic Industrial Direct Contact Values. The soil from the Railyard was contained and disposed off-site as a TSCA waste on August 10, 1998 at the USPCI Safety-Kleen Greyback Mountain Facility in Clive, Utah. The soil from the Unpaved Area was incorporated into the Green Point Landfill subgrade (following the receipt of analytical data indicating that the material was non-hazardous).

- A letter report summarizing the soil excavation activities completed at the SMI plant property to address the presence of PCBs in surface soil at concentrations above the MDEQ Industrial Direct Contact value was sent to the MDEQ on February 12, 1999 (BBL, February 1999b).

Supplemental Groundwater Sampling Activities Along the Saginaw River

- Additional groundwater sampling for PCBs was completed during July and September 1999, at wells located along the Saginaw River that have historically been associated with PCB detections. This sampling was completed to further investigate the detection of PCBs in groundwater.

Supplemental Groundwater Investigation Activities North of the Drum Remediation Area

- A letter dated June 2, 1998 was received from the MDEQ which acknowledged receipt of GM's proposed Plan for a Supplemental Groundwater Sampling Program north of the Drum Remediation Area, and requested modification of that plan (Kaelber-Matlock, June 1998a).
- On July 14, 1998, Ms. Susan Kaelber-Matlock (MDEQ) and Ms. Cheryl Hiatt (GM) met at the site to discuss the proposed work for the area north of the DRA.
- On August 7-10, 1998 groundwater samples were collected from the two new temporary wells (TW-241WT and TW-242WT) and the previously installed temporary well (TWW-1) installed north of the DRA and southwest of the Green Point Landfill. The samples were submitted to Encotec of Ann Arbor, Michigan to be analyzed for PCBs and volatile organic compounds (VOCs).
- Analytical results for this sampling effort was forwarded to the MDEQ in the September 1998 monthly report (BBL, October 1998a).
- A letter confirming additional field activities in the area north of the DRA was transmitted to the MDEQ on May 13, 1999 (BBL, May 1999).
- Additional sampling was completed during late May 1999 to define the distribution of VOCs in groundwater. The sampling locations were surveyed and a round of groundwater elevation measurements were collected from surrounding wells.

Former Underground Storage Tank (UST) #7 Area

- A replacement well for UST7-3 was installed on July 13, 1998 in the Former UST#7 investigation area located southeast of the plant building.
- The first round of sampling was performed in July 1998. Results were transmitted to the MDEQ in a letter report dated October 12, 1998 (BBL, October 1998c).
- The second round of sampling was performed in October 1998. Results were transmitted to the MDEQ in a letter report dated January 29, 1999 (BBL, January 1999c).
- The third round of sampling was performed in January 1999. Results were transmitted to the MDEQ in a letter report dated April 14, 1999 (BBL, April 1999a).

- The fourth round of sampling was performed in April 1999. Results were transmitted to the MDEQ in a letter report dated July 1, 1999 (BBL, July 1999a).
- The fifth round of sampling was completed in July 1999. A letter report is currently being prepared to present the results of that sampling event.

Quench Pit Investigation

- The Quench Pit Investigation report was transmitted to the MDEQ in April 1998 (BBL, April 1998a).

LNAPL Recovery System

- During July and August of 1998 a hydrogen peroxide injection system was added to the LNAPL Recovery System. The hydrogen peroxide system was installed to inhibit the growth of bacteria which had reduced the efficiency of the LNAPL Recovery System.

The cumulative oil recovery and groundwater treatment statistics are as follows:

Operation	Approximate Volume of Oil Recovered (Gallons) ¹	Approximate Volume of Groundwater Treated (Gallons)
LNAPL System - Total through October 4, 1999	1,580	1,366,000
Total hand bailed in 1996 and 1997	710	None
Repair of 42-inch line (recovery from abandoned 30-inch line)	5,000+	Specific amount unknown
Repair (slip lining) of 42-inch storm sewer line	approximately 3,000+	Specific amount unknown
Totals:	10,291+	1,366,000

Note: ¹ This total may include some water that is drawn through the LNAPL recovery lines under certain conditions of rapid water table fluctuation.

Green Point Landfill

- Land needed to complete construction of the landfill cap was purchased from the City of Saginaw by GM during the week of June 24, 1998.
- Green Point Landfill capping activities were initiated on June 29, 1998.
- Green Point Landfill capping activities were suspended for the winter in November 1998.
- Green Point Landfill capping activities were restarted in May 1999, and were substantially completed on September 24, 1999.

Deliverables Submitted (Tables 10-1 and 10-2 of the MDEQ-Approved RI/FS Work Plan [October 1997])

Schedule Tables 10-1 and 10-2 for the *RI/FS Work Plan* (BBL, October 1997; revised January 1998) have been updated to reflect actual submittal dates, and are included as attachments. [All deliverables have been submitted to the MDEQ on or before the deliverable due dates specified in the MDEQ-approved October 1997 *RI/FS Work Plan* (schedule tables revised January 1998).]

- Deliverable #19 from Table 10-2 of the *RI/FS Work Plan* was submitted to the MDEQ on April 14, 1998. This deliverable consisted of a letter report presenting the results of supplemental surface soil sampling in the Railyard and the Unpaved Area, and recommendations for additional sampling and excavation activities (BBL, April 1998c).
- The Buried Utility Evaluation Map and Summary Letter (Deliverable #13 from Table 10-2 of the *RI/FS Work Plan*) was submitted to the MDEQ on September 4, 1998 (BBL, September 1998a).
- The Draft RI Report (Deliverable #3 from Table 10-1 of the *RI/FS Work Plan*) was transmitted to the MDEQ on January 21, 1999 (BBL, January 1999b). The MDEQ provided comments on the RI Report (Brouillet, 1999), and a response to that letter was prepared on behalf of GM and WMI (BBL, September 1999).
- Monthly Reports have been transmitted to the MDEQ as specified in the *RI/FS Work Plan* (see references).

Meetings

- A project update meeting was held at the GM SMI Plant on March 19, 1998 with Ms. Susan Kaelber-Matlock (MDEQ-ERD).
- On July 14, 1998, Ms. Susan Kaelber-Matlock (MDEQ) and Ms. Cheryl Hiatt (GM) met at the site to discuss the proposed work for the area north of the DRA.
- On February 22, 1999 representatives of GM, the MDEQ, and BBL met to discuss the January 1999 Draft RI Report.
- Several on-site Green Point Landfill meetings were held during this time frame to observe and discuss grading and capping activities.
- A meeting was held on August 10, 1999 with representatives of the MDEQ, GM, and BBL to discuss MDEQ's comments on the RI Report.
- A meeting was held on September 30, 1999 with Stratus (MDEQ consultant for ecological issues) to discuss site ecological issues.

Anticipated Activities

The following activities are anticipated to be completed during the period from September 1999 through May 15, 2000:

- Continued operation of the LNAPL Recovery/Groundwater Treatment System.
- Continued manual bailing of LNAPL in the Quench Pit Area.
- Continued monitoring of the surface of the Stormwater Pond for the presence of oil and maintenance of oil recovery booms.
- Quarterly sampling activities at the Former UST #7 Area (scheduled for October 1999, January 2000, April 2000, and July 2000).
- Initiation of operations and maintenance activities for the Green Point Landfill.
- Additional activities to address PCB impacts to the Stormwater Pond.
- Additional field activities will be completed based on MDEQ's comments on the RI Report (Brouillet, July 1999). A written response to MDEQ's comments, including a proposal for additional work activities was submitted to the MDEQ on September 24, 1999 (BBL, September 1999).
- Submittal of the final RI Report.

Sincerely,

BLASLAND, BOUCK & LEE, INC.

Scott T. Saroff

Scott T. Saroff, C.P.G.
Vice President

KAG/jlc
Enclosure

cc: Todd Adams, Esq., Assistant Attorney General, EPD
Ms. Susan Kaelber-Matlock, MDEQ
Tony Thrubis, Esq., GM Legal Staff
Ms. Katie Moertl, Attorney at Law, Quarles & Brady
Ms. Cheryl Hiatt/Mr. Edward Peterson, GM Remediation Team
Mr. James Forney, Waste Management, Inc.
Mr. Phil Mazor, Waste Management, Inc.
Ms. Megan Shaffner/Mr. Joseph Toth, GM SMI
Ms. Lisa R. Coffey, P.G., Blasland, Bouck & Lee, Inc.
Mr. Christopher J. Canonica, P.E., Blasland, Bouck & Lee, Inc.

Annual Progress Report - References

General Motors Corporation Saginaw Malleable Iron Plant Property and REALM Inc. Green Point Landfill and Drum Remediation Area

- Blasland, Bouck & Lee, Inc. (BBL), January 1998. Letter to MDEQ, Subject: *Supplemental Groundwater Sampling Program North of the Drum Remediation Area Hillock*, January 5, 1998.
- Blasland, Bouck & Lee, Inc. (BBL), April 1998a. *Quench Pit Investigation Report*, GM SMI Plant, April 1998.
- Blasland, Bouck & Lee, Inc. (BBL), April 1998b. *Monthly Report #40 (March 1998)*, April 8, 1998.
- Blasland, Bouck & Lee, Inc. (BBL), April 1998c. Letter to MDEQ, Subject: *Supplemental Potential Worker Exposure Soil Sampling Results and Proposed Scope of Work for Excavation of Soils*, April 14, 1998.
- Blasland, Bouck & Lee, Inc. (BBL), May 1998a. *Monthly Report #41 (April 1998)*, May 12, 1998.
- Blasland, Bouck & Lee, Inc. (BBL), May 1998b. Letter to MDEQ, Subject: *Proposed Modifications to Scope of Work for Excavation of Surface Soils in the Railyard and the Unpaved Area*, May 12, 1998.
- Blasland, Bouck & Lee, Inc. (BBL), June 1998. *Monthly Report #42 (May 1998)*, June 12, 1998.
- Blasland, Bouck & Lee, Inc. (BBL), July 1998. *Monthly Report #43 (June 1998)*, July 10, 1998.
- Blasland, Bouck & Lee, Inc. (BBL), August 1998a. Letter to MDEQ, Subject: *Scope of Work to Further Characterize the Soils in the Plant Driveway Expansion Area*, August 4, 1998.
- Blasland, Bouck & Lee, Inc. (BBL), August 1998b. Letter to MDEQ, Subject: *Scope of Work to Conduct Additional Characterization of Stormwater (Small) Pond Sediments and Surface Water*, August 4, 1998.
- Blasland, Bouck & Lee, Inc. (BBL), August 1998c. Letter to MDEQ, Subject: *Scope of Work to Conduct Additional Characterization of Stormwater (Small) Pond Sediments and Surface Water (Revision to August 4, 1998 correspondence)*, August 6, 1998.
- Blasland, Bouck & Lee, Inc. (BBL), August 1998d. *Monthly Report #44 (July 1998)*, August 13, 1998.
- Blasland, Bouck & Lee, Inc. (BBL), September 1998a. *Buried Utility Investigation Letter Report*, September 4, 1998.
- Blasland, Bouck & Lee, Inc. (BBL), September 1998b. *Monthly Report #45 (August 1998)*, September 11, 1998.

Annual Progress Report - References

General Motors Corporation Saginaw Malleable Iron Plant Property and REALM Inc. Green Point Landfill and Drum Remediation Area

- Blasland, Bouck & Lee, Inc. (BBL), October 1998a. *Monthly Report #46 (September 1998)*, October 9, 1998.
- Blasland, Bouck & Lee, Inc. (BBL), October 1998b. *Background Groundwater Quality Assessment Report*, October 1998.
- Blasland, Bouck & Lee, Inc. (BBL), October 1998c. Letter to MDEQ, Subject: *First Quarterly Groundwater Monitoring Report - Interim Response Action - Former UST #7 Area - General Motors Corporation Saginaw Malleable Iron Plant*, October 12, 1998.
- Blasland, Bouck & Lee, Inc. (BBL), November 1998. *Monthly Report #47 (October 1998)*, November 11, 1998.
- Blasland, Bouck & Lee, Inc. (BBL), December 1998. *Monthly Report #48 (November 1998)*, December 11, 1998.
- Blasland, Bouck & Lee, Inc. (BBL), January 1999a. *Monthly Report #49 (December 1998)*, January 11, 1999.
- Blasland, Bouck & Lee, Inc. (BBL), January 1999b. *DRAFT Remedial Investigation Report, General Motors Corporation Saginaw Malleable Iron Plant Property and REALM Inc. Green Point Landfill and Drum Remediation Area*, January 1999.
- Blasland, Bouck & Lee, Inc. (BBL), January 1999c. Letter to MDEQ, Subject: *Second Quarterly Groundwater Monitoring Report - Interim Response Action - Former UST #7 Area - General Motors Corporation Saginaw Malleable Iron Plant*, January 29, 1999.
- Blasland, Bouck & Lee, Inc. (BBL), February 1999a. *Monthly Report #50 (January 1999)*, February 9, 1999.
- Blasland, Bouck & Lee, Inc. (BBL), February 1999b. Letter to MDEQ, Subject: *GM Saginaw Malleable Iron Plant Property - Saginaw, Michigan - Further Characterization of Soils in the Plant Driveway Expansion Area*, February 12, 1999.
- Blasland, Bouck & Lee, Inc. (BBL), March 1999. *Monthly Report #51 (February 1999)*, March 10, 1999.
- Blasland, Bouck & Lee, Inc. (BBL), April 1999a. Letter to MDEQ, Subject: *Third Quarterly Groundwater Monitoring Report - Interim Response Action - Former UST #7 Area - General Motors Corporation Saginaw Malleable Iron Plant*, April 14, 1999.
- Blasland, Bouck & Lee, Inc. (BBL), April 1999b. Letter to MDEQ, Subject: *Results of Supplemental Stormwater Pond Investigation*, April 14, 1999.
- Blasland, Bouck & Lee, Inc. (BBL), May 1999. Letter to MDEQ, Subject: *Supplemental Investigation North of the DRA*, May 13, 1999.

Annual Progress Report - References

General Motors Corporation Saginaw Malleable Iron Plant Property and REALM Inc. Green Point Landfill and Drum Remediation Area

- Blasland, Bouck & Lee, Inc. (BBL), July 1999a. Letter to MDEQ, Subject: *Fourth Quarterly Groundwater Monitoring Report - Interim Response Action - Former UST #7 Area - General Motors Corporation Saginaw Malleable Iron Plant*, July 1, 1999.
- Blasland, Bouck & Lee, Inc. (BBL), July 1999b. Letter to MDEQ, Subject: *Background Groundwater Quality Study, Response to MDEQ Memorandum Dated December 18, 1998*, July 7, 1999.
- Blasland, Bouck & Lee, Inc. (BBL), September 1999. Letter to MDEQ, Subject: *Response to MDEQ comments on GM SMI RI Report*, September 24, 1999.
- Brouillet, Allan C. (MDEQ), April 1998. Letter to GM, Subject: *Additional Response Activity - General Motors Saginaw Malleable Iron Facility - Consent Judgment #98-22686-CE-2*, April 27, 1998.
- Brouillet, Brenda J. (MDEQ), August 1998a. Letter to GM, Subject: *GM Saginaw Malleable Iron Consent Decree #98-22686-CE-2*, August 14, 1998.
- Brouillet, Brenda J. (MDEQ), August 1998b. Letter to GM, Subject: *GM Saginaw Malleable Iron Consent Decree #98-22686-CE-2*, August 14, 1998.
- Brouillet, Brenda J. (MDEQ), July 1999. Letter to GM, Subject: *GM SMI RI Report and Supplemental Investigations* (Lansing, Michigan: July 19, 1999).
- General Motors Corporation (GM), April 1999. *Monthly Report #52 (March 1999)*, April 9, 1999.
- General Motors Corporation (GM), May 1999. *Monthly Report #53 (April 1999)*, May 1999.
- Kaelber-Matlock, Susan (MDEQ), June 1998a. Letter to GM, Subject: *GM Saginaw Iron, Consent Judgment #98-22686-CE-2*, June 2, 1998.
- Kaelber-Matlock, Susan (MDEQ), June 1998b. Letter to GM, Subject: *GM Saginaw Iron, Consent Judgment #98-22686-CE-2*, June 8, 1998.
- Stone, Ronald (MDEQ), December 1998. MDEQ Interoffice Communication, Subject: *General Motors - Saginaw Malleable Iron Plant Background Groundwater Quality Assessment Report - October 1998*, December 18, 1998.

SCHEDULE FOR GREEN POINT LANDFILL CLOSURE
AND SUBMITTAL OF MAJOR DELIVERABLES TO THE MDEQ

GENERAL MOTORS CORPORATION
SAGINAW MALLEABLE IRON PLANT PROPERTY,
GREEN POINT LANDFILL, AND DRUM REMEDIATION AREA
SAGINAW, MICHIGAN

Deliverable	Submittal and Completion Schedule ***
1. Monthly Reports	Within 15 days of end of month for which report has been prepared; starting from the end of first month following entry of Consent Judgment.
2. Work Plan to Complete Supplemental Phase II Investigation at Former Tank #7	Work Plan was transmitted on February 9, 1996. [COMPLETED]
3. Draft RI Report	Report was submitted to the MDEQ on January 21, 1999. [COMPLETED]
4. Final RI Report	Within 120 days of receiving comments from MDEQ on Draft RI Report.
5. Draft FS Report	Within 6 months of MDEQ approval of Final RI Report.
6. Final FS Report	Within 90 days of receiving comments from MDEQ on Draft FS Report.
7. Green Point Landfill Combined Conceptual Engineering and 35% Design Report (including Subgrade Plan)	Design report was transmitted on February 5, 1996. [COMPLETED]
8. Green Point Landfill 90% Design Report	Report was submitted to the MDEQ on October 28, 1997. [COMPLETED]
9. Green Point Landfill Final Design Report	Report was submitted to the MDEQ in January 1998. [COMPLETED]
10. Green Point Landfill Subgrade Construction	Subgrade construction was completed during July 1997. [COMPLETED]
11. Green Point Landfill Cap Construction**	Cap construction was initiated during July 1998.
12. Green Point Landfill "As-Built" Drawings	Within 120 days of final completion of Green Point Landfill cap construction.
13. Draft RAP	Within 7 months of MDEQ approval of Final FS Report.
14. Final RAP	Within 120 days of receiving comments from MDEQ on Draft RAP.

Notes:

* A construction season day is a week day between April 15 and October 15 during which earthwork operations can be reasonably performed.

** Landfill cap construction consists of all remedial activities required in the final design for the landfill.

*** Transmittal dates refer to the dates that deliverables were sent out from preparers, and do not indicate the dates that deliverables were received by the MDEQ.

TABLE 10-2

REVISED

SCHEDULE FOR SUBMITTAL OF OTHER DELIVERABLES TO THE MDEQ

GENERAL MOTORS CORPORATION
SAGINAW MALLEABLE IRON PLANT PROPERTY,
GREEN POINT LANDFILL, AND DRUM REMEDIATION AREA
SAGINAW, MICHIGAN

Deliverable ¹	RI/FS Work Plan Section	Submittal Due Date ³
1. Plan to determine representative background concentrations in groundwater of hazardous substances of interest.	Section 1.3	Plan was transmitted to the MDEQ on April 17, 1996. [COMPLETED]
2. Sewer Map	Section 7.6	The site sewer map was transmitted to the MDEQ on February 17, 1995. [COMPLETED]
3. Buried Utility Maps² (including updated sewer map and invert elevations of key manholes).	Section 7.4	The buried utility maps were transmitted to the MDEQ on September 4, 1998. [COMPLETED]
4. Analytical Monitoring Plan for SMI Sewer System. This plan will be based on the buried utility maps and analytical results of POTW monitoring program and other sewer samples.	Section 7.6	Plan was transmitted to the MDEQ by CRA on February 3, 1997. [COMPLETED]
5. Report presenting the results of the Perimeter Geophysical Survey.	Section 7.1	Report was transmitted to the MDEQ on June 23, 1995. [COMPLETED]
6. Letter Report summarizing results of temporary monitoring well sampling around perimeter of SMI Plant building and site, and recommendations, if appropriate, for the installation of permanent monitoring wells.	Section 7.2.1	Letter report was transmitted to the MDEQ on August 30, 1995. [COMPLETED]
7. Transmittal of summary tables of analytical data collected during six month POTW Sampling Program to the MDEQ.	Section 7.6	Data summary tables were transmitted to the MDEQ on August 1, 1996. [COMPLETED]
8. Transmittal of historical analytical data for POTW point of compliance (CFD-02) discharge.	Section 7.6	Data summary report was transmitted to the MDEQ on December 29, 1996. [COMPLETED]
9. Report summarizing analytical results of first round of groundwater sampling. The report will propose to the MDEQ a list of site-specific constituents for future groundwater sampling activities, and will present recommendations for additional well installation, if needed, to further investigate on-site sources, the site perimeter, or off-site areas.	Sections 7.2.4, and 7.2.4.3	Report was transmitted to the MDEQ on January 22, 1996. [COMPLETED]
10. Letter Report presenting analytical results of surface soil sampling. Recommendations for additional surface soil sampling to assess potential worker exposure will also be made, if appropriate.	Section 7.5.4	Letter report was transmitted to the MDEQ on March 8, 1996. [COMPLETED]
11. Report presenting the results of the geophysical borehole logging task and recommendations for additional borings, if needed, to understand discrepancies between the geophysical data and boring logs.	Section 7.2.5	Report was transmitted to the MDEQ on January 19, 1996. [COMPLETED]
12. Transmittal of Quarterly Water Level Data.	Section 7.2.8	Transmitted to the MDEQ within the RI Report, January 21, 1999. [COMPLETED]

TABLE 10-2

REVISED

SCHEDULE FOR SUBMITTAL OF OTHER DELIVERABLES TO THE MDEQ

GENERAL MOTORS CORPORATION
SAGINAW MALLEABLE IRON PLANT PROPERTY,
GREEN POINT LANDFILL, AND DRUM REMEDIATION AREA
SAGINAW, MICHIGAN

Deliverable ¹	RI/FS Work Plan Section	Submittal Due Date ³
<p>13. Letter Report evaluating whether buried utilities (or bedding material) may be serving as preferential pathway(s) for groundwater migration.</p> <p>Report must include maps of buried utilities with an indication of where utilities or bedding materials lie below the water table.</p> <p>Recommendations, if appropriate, for additional borings/monitoring wells need to be included in report.</p>	Section 7.4	<p>The buried utility evaluation map and summary letter were transmitted to the MDEQ on September 4, 1998. [COMPLETED]</p>
<p>14. Notification of MDEQ and Preparation of a Work Plan¹, if needed, to address any discovered point source discharge to the Saginaw River originating on GM Property.</p>	Section 7.4	<p>Notification of MDEQ within 7 days of discovery, Work Plan due 30 days from date of discovery. [COMPLETED]</p>
<p>15. Report presenting results of Drum Remediation Area Test Pit Investigation.</p>	Section 5.1	<p>Report was transmitted to the MDEQ on August 31, 1995. [COMPLETED]</p>
<p>16. Soil Investigation Work Plan¹ for Drum Remediation Area, if needed, following completion of Test Pit Investigation.</p>	Section 7.5.2	<p>A Sampling and Analysis Plan to allow consolidation of DRA hillock soils with the Green Point Landfill subgrade, dated August 20, 1996, was transmitted to the MDEQ. Excavation and relocation activities were completed during February 1997. [COMPLETED]</p>
<p>17. Report on the Previous Metal Feedstock Area, based on results of soil sampling and downgradient monitoring well groundwater results, including a work plan, if needed, to install monitoring wells in this area.</p>	Section 7.5.3	<p>Letter report dated August 9, 1996 was transmitted to the MDEQ. [COMPLETED]</p>
<p>18. Plan to further investigate groundwater quality north of the Drum Remediation Area.</p>	NA	<p>The initial investigation plan was submitted to the MDEQ on the MDEQ on January 5, 1998. A supplemental plan was submitted to the MDEQ on May 13, 1999. A letter report will be transmitted to the MDEQ in fall 1999.</p>
<p>19. Letter report presenting the results of supplemental surface soil sampling in the Railyard and the Unpaved Area, and recommendations for additional activities, as appropriate.</p>	NA	<p>The letter report was transmitted to the MDEQ on April 14, 1998. [COMPLETED]</p>

Notes:

- ¹ The requirement for certain plans are contingent upon factors specified in the RI/FS Work Plan.
- ² Buried utilities include buried sewer (current and abandoned), electrical, water, natural gas, fire protection lines and tunnels.
- ³ Transmittal dates refer to the dates that deliverables were sent out from preparers, and do not indicate the dates that deliverables were received by the MDEQ.