



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD

CHICAGO, IL 60604-3590

June 27, 2005

REPLY TO THE ATTENTION OF

Jean Caufield
General Motors Corporation
Pontiac Centerpoint Campus
Mail Code 483-520-190
2000 Centerpoint Parkway
Pontiac, Michigan 48341-3147

RE: Corrective Action Activities at Centerpoint Complex
Pontiac, Michigan
MID 005 356 902

Dear Ms. Caufield:

Over the last several months beginning soon after you regained project management for the East Pontiac Centerpoint Complex ("Site"), we have discussed the need to move the site toward completion of RCRA corrective action. As you know, U.S. EPA's December 19, 2002, comments on the RFI Report have been addressed by GM. However, EPA had deferred formal approval of the RFI in anticipation that the Groundwater Not In An Aquifer (GWNIAA) and Groundwater/Surface Water Interface (GSI) demonstrations could be incorporated into the RFI Report. I have assessed the efforts conducted in addressing the GSI demonstration (the GWNIAA is no longer being pursued) and have concluded that the review process and final decision on GSI can be made separate from the RFI process since GSI is not a requirement of U.S. EPA or the AOC but rather a requirement of the State of Michigan. As such, the GSI process does not have to hold up the approval of the RFI Report or development and implementation of the corrective measures that follow. Consequently, in accordance with Section X.A. of the AOC, I hereby approve the RFI Report.

Upon approval of the RFI Report, Section VIII.C.1. of the AOC requires GM to submit a CMS Work Plan within 60 days of U.S. EPA's approval. In the past GM has suggested submitting a Corrective Measures Proposal (CMP) in lieu of a CMS Work Plan which would also address the Burn Pile area (AOI 71) and Building 33 (AOI 53) issues. We are open to this idea but believe it would require a modification to the AOC. U.S. EPA is willing to discuss making such a modification pursuant to Section XXIII of the AOC so long as the modification is completed within 30 days from the date of this letter. One element of that extension would be establishing a submittal date for the CMP. Timelines for addressing corrective measures at the Burn Pile and/or Building 33 could be negotiated during development of the CMP. However, absent a modification, the current

AOC requirement for submittal of a CMS Work Plan within 60 days will remain applicable.

I hope that approval of the RFI Report and the possible modification described above will both streamline and expedite completion of corrective action at the Centerpoint Complex. I look forward to hearing back from you on this matter.

Sincerely,

A handwritten signature in cursive script, reading "Daniel Patulski".

Daniel Patulski
EPA Project Manager

cc: Brian Barwick, EPA/ORC
Gerald Phillips, EPA