

Motors Liquidation Company
M/C 482-C37-A99
300 Renaissance Drive
Detroit, Michigan 48265

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

August 17, 2009

Mr. James C. Bennett
U.S. EPA Region III
Ground Water and Enforcement Branch (3WP22)
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

Re: Analysis of Storm Water Duplex Sump discharge Quarter 3
General Motors Powertrain – Fredericksburg, Virginia
Order on Consent Docket No. SDWA-03-2009-0016-DU

Dear Mr. Bennett:

As you may be aware, on June 1, 2009, General Motors Corporation filed for bankruptcy under Chapter 11 of the United States Bankruptcy Code, *In re: General Motors Corporation*, Case No. 09-50026 (REG), (Bankr. S.D. New York). On July 5, 2009, the bankruptcy court approved the sale of certain assets to NGMCO, Inc. The sale transaction was completed on July 10, 2009 and NGMCO, Inc. was renamed General Motors Company. Please note that the Fredericksburg Powertrain facility was not included in the sale to General Motors Company and ownership remains with General Motors Corporation which has changed its name to Motors Liquidation Company ("MLC"). However, to meet ongoing production demands, General Motors Company is leasing and operating the Fredericksburg Powertrain facility from MLC for approximately eighteen months.

MLC is submitting this response which was prepared by General Motors Company personnel. Attached is the specified analysis of the Storm Water Duplex Sump discharge required in Paragraph 2 of the above captioned Consent Order. Attachment A (file name Quarter 3 analytical data 07152009) includes a summary table of analytical results of the storm water duplex discharge sample taken on July 15, 2009 and associated laboratory report. None of the sampling exceeded detect levels; therefore, a full VOC analysis was not performed per Paragraph 3 of the Consent Order.

If you have any questions, please feel free to contact the undersigned at (937)478-8221.

Sincerely,

A handwritten signature in cursive script that reads "Pamela L. Barnett".

Pamela L. Barnett, P.G.

BOW Environmental Solutions, Inc. on behalf of MLC

cc: Jon M. Capacasa, Director Water Protection Division, U.S. EPA Region III
Royden Grove, GM Company Fredericksburg Plant Manager
Dan F. Hughes, GM Company Environmental Group Manager
Jessica Jeffrey, GM Company Environmental Engineer

Enclosure(s)

GMPT Fredericksburg
Quarter 3 2009
Analytical Data

Analytical Parameter	Analytical Method	Units	Analytical Results
			07.15.2009
			Results
Total Organic Carbon (TOC)	SM 5310 C	mg/L	< 1.00
Total Petroleum Hydrocarbons (TPH)	SW-846 8015C	mg/L	< 5.00
Oil and Grease (O&G)	EPA 1664A	mg/L	< 5.00
pH	SM 4500H+B	SU	6.21
Benezene	EPA 524.2	mg/L	<.005
Total Xylenes	EPA 524.2	mg/L	<.005
Glycol Scan	SW-846 8015M	mg/L	< 5.00



Analytics Corporation
10329 Stony Run Lane
Ashland, VA 23005
Phone: (804)365-3000
Fax: (804)365-3002

July 23, 2009

JESSICA JEFFERY
G M POWERTRAIN
11032 TIDEWATER TRAIL
FREDERICKSBURG, VA 22408

Purchase Order: GMS34194

Client ID: GM-FREDERICKSBURG GW SUMP

Workorder: 9196020

Dear JESSICA JEFFERY:

Enclosed are the analytical results for sample(s) received by the laboratory on Wednesday, July 15, 2009. Results reported herein conform to the most current NELAC standards, where applicable, unless otherwise narrated in the body of the report.

Unless otherwise specified all analyses of solid materials are based on dry weight.

The signature at the end of this report certify that the results are based on the referenced methods and unless otherwise noted meet the requirements of NELAC.

Reported results relate only to the items tested, as received by the laboratory

On-site analysis (analysis ASAP) is recommended for the following tests: pH, temperature, dissolved oxygen, residual chlorine and sulfite. When performed off-site, these tests do not meet NELAC standards.

Abbreviations: ug/L = micrograms per Liter, mg/L = milligrams per Liter, ug/g = micrograms per gram, mg/kg = milligrams per kilogram, ug/wp = micrograms per wipe, ug/ml = micrograms per millimeter, uS = microsiemens per centimeter at 25 degrees Celcius, ppb = parts per billion, DF = Dilution Factor

If you have any questions concerning this report, please feel free to call Client Services at 1-800-888-8061.

Sincerely,

Dawn Casto

Enclosures

CERTIFICATE OF ANALYSIS

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Analytics Corporation
10329 Stony Run Lane
Ashland, VA 23005
Phone: (804)365-3000
Fax: (804)365-3002

SAMPLE SUMMARY

Workorder: 9196020 GM-FREDERICKSBURG GW SUMP

Lab ID	Sample ID	Matrix	Date Collected	Date Received
9196020001	GM-071509-001	Aqueous Liquid	7/15/2009 09:15	7/15/2009 13:25

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ANALYTICAL RESULTS

Workorder: 9196020 GM-FREDERICKSBURG GW SUMP

Lab ID: 9196020001
Sample ID: GM-071509-001

Date Received: 7/15/2009 13:25 Matrix: Aqueous Liquid
Date Collected: 7/15/2009 09:15 Samp Type: GRAB

Parameters	Results	Units	Report Limit	DF	Prepared	By	Analyzed	By	Qual
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Analysis Desc: SM 4500H+ B		Analytical Method: SM 4500H+ B							
pH(see cover page)	6.21	SU		1			7/15/2009 20:40	RS	

Analysis Desc: SW-846 8015M		Analytical Method: SW-846 8015M							
Dipropylene glycol	<5.00	mg/L	5.00	1			7/22/2009 11:14	RPL	
Ethylene Glycol	<5.00	mg/L	5.00	1			7/22/2009 11:14	RPL	
1,4-Butanediol	<5.00	mg/L	5.00	1			7/22/2009 11:14	RPL	
Diethylene Glycol	<5.00	mg/L	5.00	1			7/22/2009 11:14	RPL	
Triethylene Glycol	<5.00	mg/L	5.00	1			7/22/2009 11:14	RPL	
Propylene Glycol	<5.00	mg/L	5.00	1			7/22/2009 11:14	RPL	

Analysis Desc: EPA 524.2		Analytical Method: EPA 524.2							
m & p-xylene	<0.500	ug/L	0.500	1			7/16/2009 14:01	SJS	
Benzene	<0.500	ug/L	0.500	1			7/16/2009 14:01	SJS	
o-Xylene	<0.500	ug/L	0.500	1			7/16/2009 14:01	SJS	

Analysis Desc: SM 5310 C		Analytical Method: SM 5310 C							
TOC	<1	mg/L		1	1		7/17/2009 07:58	DOI	

Gasoline Range Organics

Analysis Desc: SW-846 8015C		Analytical Method: SW-846 8015C							
TPH - GRO	<500	ug/L	500	1			7/15/2009 14:28	SJS	

General Chemistry

Analysis Desc: EPA 1664A		Analytical Method: EPA 1664A							
Hexane Extractable Material	<5.00	mg/L	5.00	1			7/20/2009 11:29	NT	

CERTIFICATE OF ANALYSIS

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ENVIRONMENTAL CHAIN OF CUSTODY

ACCOUNT NAME AND ADDRESS

G M POWERTRAIN

11032 TIDEWATER TRAIL
FREDERICKSBURG, VA 22408
Phone: 540-899-5031
Fax: 1-540-899-5105
PROJ#: 45309260

DATE SHIPPED

07/15/09

OF SAMPLES

1

PROJECT NAME OR NUMBER

Gm-Fredericksburg Gw Sump

PURCHASE ORDER NO.

CONTACT

Jessica Jeffery

TELEPHONE NUMBER

540-419-7298

RUSH ANALYSIS

☐ 24 HOUR
☐ 48 HOUR

Extra Charge

SPECIAL INSTRUCTIONS:

Gw Sump
Please only show Benzene +
Xylene on report.

ANALYTICS

10329 Stony Run Lane

Ashland, VA 23005

Phone (804) 365-3000

Toll Free (800) 888-8061

Fax (804) 365-3002

CHAIN OF CUSTODY RECORD

MATRIX CODES

A = AQUEOUS

O = OIL

S = SOLID

X = OTHER

ANALYSIS REQUESTED (Place an "X" in the box below to indicate request)

			MATRIX	# of Bottles	Grab / Comp.	ANALYSIS REQUESTED										Preservative					COMMENTS
						PAH 504500	PAH 166474	PAH-ERO 30846	PAH-ERO 8015	Benzene Xylene	EPA 524.2	G14001	30846	8015	700	504500	H ₂ SO ₄	HCL	HNO ₃	NaOH	
Lab ID	Sample Identification	Date & Time																			
	Gm-071509-001	7/15/09 0915	A	1	G	X													X	Gw Sump	
	↓	↓	A	2	G		X										X			↓	
			A	3	G			X									X				
			A	3	G				X								X				
			A	2	G					X									X		
	↓	↓	A	1	G						X					X				↓	
Total 12 Bottles																					

SAMPLED BY (PRINT NAME):

Jessica Jeffery

SAMPLED BY (SIGNATURE TO INITIATE COC):

Jessica Jeffery

DATE

07/15/09

TIME

0930

SAMPLES RECEIVED BY:

(SIGNATURE)

DATE

TIME

CONDITION

SAMPLES RELINQUISHED BY:

(SIGNATURE)

DATE

TIME

CONDITION

JAMES ALTIERI

RETAIN BACK COPY FOR PERSONAL RECORDS

ENVCO-01 (REV. 2001-0)

Account Name: Gm FrederickburgWorkorder Number: 9796070

Sample Container Receipt Form

Page ___ of ___

Client Sample ID	<u>Gm-071509-001</u>							
Analytics Sample ID	<u>1</u>							
Type of Container	<u>1000G</u>	<u>250G</u>	<u>125P</u>	<u>70mB</u>				
Number of Containers	<u>2</u>	<u>1</u>	<u>1</u>	<u>2</u>	<u>6</u>			
Temperature on Arrival	<u>68°C</u>							
pH on Arrival	<u>—</u>	<u>1</u>	<u>—</u>	<u>—</u>	<u>—</u>			
Chlorine on Arrival (ppm)	<u>—</u>							
VOA Sample Condition -	<u>—</u>			<u>OK</u>				
General Condition	<u>OK</u>			<u>—</u>				
Preservation (as marked)	<u>HCL</u>	<u>H₂SO₄</u>	<u>COOL</u>	<u>—</u>	<u>HCL</u>			
Notes and comments								

P=Plastic; G=Glass, Am=Amber, VOA=VOA vial

Sample Custodian JAMES ALTIERI Date 7-15-09