

PROJECT FACT SHEET 7

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Jun 18, 2009 07:49

RCRA CORRECTIVE ACTION 13000 ECKLES ROAD SITE LIVONIA, MICHIGAN

INTRODUCTION

General Motors (GM) has prepared this Project Fact Sheet to update the community about activities being performed at GM's Eckles Road Site (Site) in Livonia, Michigan. This Fact Sheet discusses progress that has been made under an agreement that GM and the U.S. Environmental Protection Agency (U.S. EPA) have signed to conduct Corrective Action at the Site under the Resource Conservation and Recovery Act (RCRA). Remediation and Liability Management Company, Inc. (REALM), a subsidiary of GM, is performing the Corrective Action work at the Site. The U.S. EPA and GM are cooperating with the Michigan Department of Environmental Quality (MDEQ) on the Corrective Action work.

SITE BACKGROUND

The former GM plant Site is located at 13000 Eckles Road in Livonia, Michigan, on approximately 120 acres. The plant began operating in 1954 fabricating coil springs, bumpers, and strut assemblies for vehicles. The plant ceased operations in July 2000. As part of the Corrective Action work REALM, has investigated soil and groundwater to evaluate and to address any effects of past operations at the Eckles Road plant. Most facilities across the country that have applied for a permit to manage hazardous waste are subject to regulation under RCRA.

RCRA CORRECTIVE ACTION

REALM has been conducting RCRA Corrective Action at the Site pursuant to a performance-based Corrective Action Agreement between U.S. EPA and GM. Under the agreement, REALM has investigated the Site and has addressed those areas where conditions may pose a significant risk to human health and the environment.

The scope of the investigation and the required remediation work has been reviewed with U.S. EPA and has been conducted according to standards

RCRA CORRECTIVE ACTION

The **Resource Conservation and Recovery Act (RCRA)** is a federal law that encourages recycling and requires responsible waste management in a manner that is protective of human health and the environment. Facilities across the country that have applied for a permit to manage hazardous waste are subject to regulation under RCRA.

Corrective Action is a process through which the areas of a facility that may have been affected by the management of solid or hazardous waste, or releases of hazardous constituents, are evaluated and, if necessary, remediated.

The **United States Environmental Protection Agency (U.S. EPA) Region 5**, has signed a performance-based agreement with GM for Corrective Action work at the Site.

Michigan Department of Environmental Quality (MDEQ) is cooperating with the U.S. EPA and GM on the Corrective Action work being performed at the Site.

Remediation and Liability Management Company, Inc. (REALM), a subsidiary of GM, is performing the Corrective Action work at the Site.

For more information about this project, please call Sharon Morton at General Motors, toll-free at 1-888-436-6687.



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that are protective of human health and the environment.

RCRA CORRECTIVE ACTION PROCESS

Over the past five years, REALM has completed several steps in the RCRA Corrective Action process for the Eckles Road Site. These steps have included several environmental investigations and subsequent actions to address areas of affected soil and groundwater at and near the property. The Interim Measures that had previously been conducted at certain areas of the site were proposed as the final actions for those areas. The proposal also included the excavation of impacted soil in the north-central portion of the Site. The soil in this area had been affected by certain polycyclic aromatics hydrocarbons (PAHs) and polychlorinated biphenyls (PCBs). A total of 3,286 tons of soil was removed and transported off site for appropriate disposal. The proposal also included provisions for future groundwater monitoring and certain engineering and institutional controls on the property to control future exposure to constituents left in place. (For a complete history of environmental investigations, please visit the information repository at the Livonia library, or see Fact Sheet 6 for a summary.)

After a public comment period and public meeting, the U.S. EPA published a document which outlines the final steps that will be taken at the Site to complete the RCRA Corrective Action process. This document is called a Final Decision and Response to Comments (Final Decision), and was published in March 2006, and included responses to comments received from the public during the public comment period.

The Final Decision calls for engineering and institutional controls on-site including restrictive covenants, a dust control plan, and continued operation of a groundwater collection and treatment system at the southwest corner of the Site, and continued groundwater monitoring on and off-site to evaluate any changes in groundwater conditions. The Final Decision also calls for the following activities which have already been completed as Interim Measures: soil excavation in some areas of the Site, treatment of groundwater at the southeast portion of the Site, and installation of a slurry wall at the southwest portion of the Site to contain groundwater.

ADMINISTRATIVE ORDER ON CONSENT

U.S. EPA and GM have signed an Administrative Order on Consent (AOC), which establishes the basis for carrying out the selected corrective measures at the Site. This AOC addresses several long-term actions that will be taken at the Site, such as implementing an Operation, Maintenance and Monitoring Plan, Restrictive Covenants, a Groundwater Monitoring Plan, and a Dust Control Plan.

OPERATIONS, MAINTENANCE AND MONITORING PLAN

The Operation, Maintenance, and Monitoring (OMM) Plan identifies and implements the necessary measures and controls to restrict the use of the Site in any manner needed to assure the effectiveness and integrity of the final remedy decided by U.S. EPA.. The OMM Plan references the appropriate documents where additional details are located. The elements of the OMM Plan include the Restrictive Covenants, Groundwater Monitoring Plan, Dust Control Plan, and Groundwater Treatment Plant Operation and Maintenance Manual. An annual report will be submitted to the U.S. EPA summarizing the previous year's OMM activities. Any changes recommended in the OMM activities will be proposed in the annual report and reviewed with U.S. EPA for approval. GM will continue to cooperate with the U.S. EPA to ensure that work completed at the Site is conducted according to standards that are protective of human health and the environment.

RESTRICTIVE COVENANTS

Restrictive covenants place limits on the property to ensure that the future use of the Site is protective of public health. These limits are attached to the deed of the property so that future owners are aware of and abide by the restrictions. For the Eckles Road Site, the future use of the property will be limited to commercial and industrial activities. Use of groundwater on the Site is prohibited. Additional requirements are: continued operation of the groundwater collection and treatment system; maintenance of the slurry wall and cover in the southwest portion of the Site; and, implementation of a dust control plan for any activities that could generate significant particulate emissions in the North Boundary Area of the Site. Permanent markers listing these restrictions have been placed at the Site.

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GROUNDWATER MONITORING PLAN

The Groundwater Monitoring Plan details the requirements for collecting groundwater samples at the Site's perimeter and downgradient of the Former Plating Area and the Former Fire Training Area to continue monitoring groundwater, to confirm that the extent of impacted groundwater at each area remains stable or decreases. Additionally, groundwater elevation measurements will be collected to monitor groundwater flow directions at on and off-site locations. Thicknesses of Light non-aqueous phase liquid (LNAPL), also known as oil floating on top of the groundwater, will be measured, if present, in monitoring wells located at the former Pickling Machines/Flat Polish Area. The results of the groundwater monitoring activities will be submitted to and reviewed with the U.S. EPA annually. As part of implementing the Groundwater Monitoring Plan for the Site, REALM and the U.S. EPA have evaluated the need for each monitoring well located on and off-site. Some wells that were located in areas no longer needing to be monitored were properly removed in late 2006. When these wells were located on private property, REALM coordinated well removal efforts with the property owners.

DUST CONTROL PLAN

The Dust Control Plan requires that an activity-specific dust control plan be prepared and submitted to U.S. EPA for review and approval when an activity that may potentially generate dust in the North Boundary Area is expected to last longer than 5 consecutive days. The activity-specific dust control

plan would describe the engineering and/or institutional controls that will be implemented to ensure that the activity will be conducted in a manner that is protective of human health and the environment.

INFORMATION REPOSITORY

GM has established an information repository where final project-related documents are available for public review. The information repository is located at:

Livonia Public Library Civic Center
32777 Five Mile Road
Livonia, Michigan 48150
Phone: 734-466-2450

CONTACT INFORMATION

If you would like more information about this project, please contact:

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