



JOHN ENGLER, Governor

DEPARTMENT OF ENVIRONMENTAL QUALITY

"Better Service for a Better Environment"

HOLLISTER BUILDING, PO BOX 30473, LANSING MI 48909-7973

INTERNET: www.deq.state.mi.us

RUSSELL J. HARDING, Director

REPLY TO:

SHIAWASSEE DISTRICT OFFICE
10650 BENNETT DR
MORRICE MI 48857-9792

June 24, 1998

Mr. Mark Alan White
1180 North Linden Road
Flint, Michigan 48532-2342

Dear Mr. White:

SUBJECT: Linden Road Landfill, Flint Township, Genesee County, Michigan

The Michigan Department of Environmental Quality (MDEQ) has received your June 12, 1998 letter. This correspondence is in reply to the questions and concerns you raised about the Linden Road Landfill Remedial Action Plan (RAP) in your letter and at the Flint Township Board meeting held on June 1, 1998.

Groundwater:

General Motors Corporation (GM) has performed a series of groundwater investigations at the site. The site has a shallow water bearing zone at 3 to 10 feet below the ground surface. This water bearing zone does not contain sufficient water for it to be considered an aquifer. The shallow water bearing zone has shown some impact, but no contamination is migrating off site. Underlying this shallow water bearing zone is a homogeneous, silty, low permeability clay ($K_h = 7.2 \times 10^{-8}$ cm/sec) which is 8 to 13 feet thick. This clay is considered a confining unit due to its continuity across the site. The aquifer below the clay has shown no impact.

Investigation data does not support the aquifer being hydraulically connected with the shallow water bearing zone. Groundwater flow direction has been consistently toward the northeast, with a groundwater divide near the southern portion of the east side of the site that directs a small portion of the groundwater to the southeast. Continued groundwater monitoring is part of the RAP.

Linden Road Frontage:

Section 324.20120c of the Natural Resources and Environmental Protection Act (NREPA), 1994 PA 451, as amended, allows movement of contaminated soil from one part of a site to another, if such movement will not exacerbate contaminant migration or cause an area of the site not previously impacted to become contaminated. Neither of these points are issues at Linden Road Landfill. Removing contaminated soil from the frontage and placing it in the low areas of the rear of the site is essentially consolidating similar materials under the soil cover.

Upon completion of this activity, GM is confident closure sampling will show they have remediated the frontage to the generic residential closure criteria. A generic residential closure is an unrestricted closure. If GM can achieve generic residential criteria in the frontage area, the MDEQ cannot require GM to place deed restrictions on resource use.

At the township meeting the board discussed whether or not it had the power to restrict groundwater use in an area. The MDEQ offered no opinion on the township's legal question. Relocation of contaminated frontage soil is not an updated proposal. The proposal to close the Linden Road frontage under different criteria from the western part of the site was presented to the Flint Township Planning Commission on April 9, 1998. The Planning Commission approved the plan at that meeting.

Fugitive dust:

Your concern that fugitive dust may migrate from the site during construction has been addressed in the Health and Safety Plan (HASP) for the project. Air monitoring for dust will take place anytime dirt is being moved. Should the particulate level in the air exceed $3\text{mg}/\text{m}^3$, work will be halted until engineering controls can be implemented to limit dust levels.

Request for a Public Hearing:

Section 20120d(3)(c)(i) of NREPA states, "...the department shall do all of the following: Provide an opportunity for a public meeting at or near the facility when any of the following occur... The department determines that there is a significant public interest or that for any other reason a public meeting is appropriate". Further, significant public interest is defined in Section 20120d(1) of NREPA as being "...25 citizens of the local unit of government". Your letter is the only request the MDEQ has received for another public hearing on this project.

Ethics:

For the record, Mr. Innes is employed by the MDEQ in the Environmental Response Division. He is an Environmental Quality Analyst and has been assigned project management duties at the Linden Road Landfill. Mr. Innes' attendance at the board meeting was at the township's request. Mr. Innes answered the questions posed by the board and the citizens in attendance honestly and openly. Questions and answers transcribed from an audio tape of the meeting are part of the administrative record for the RAP.

School vs. soccer field:

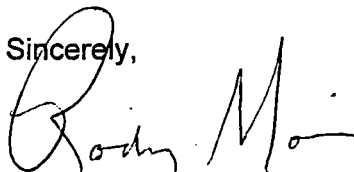
Data gathered at the site has shown the Linden Road Landfill poses a risk for individuals that come in direct contact with contaminated soil. The technical specifications of a soil cover, in conjunction with restrictions on breaching the cover, eliminate this pathway. Mr. Innes correctly answered the question of whether or not the MDEQ would allow a school to be built without removal of contaminated soil. Erecting a structure would necessitate excavating contaminated soil creating a contaminant migration pathway. With any type of a building there also could be a potential concern for indoor air quality.

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Also, the number of hours per day and days per week assumed exposure is much greater for a school than a soccer field. Comparing the reduction of risk by placing a soil cover over impacted soil to play soccer and what remedial action would be required if construction of a school were proposed is a misapplication of model parameters.

Your letter and the concerns you raised at the June 1, 1998 meeting, along with this reply, have been entered into the administrative record for the Linden Road Landfill RAP. Please submit any further comments to Mr. James Innes at the address above by June 30, 1998. Please feel free to call me at the number below.

Sincerely,

A handwritten signature in black ink, appearing to read "Rodney Mosier". The signature is fluid and cursive, with the first name "Rodney" being larger and more prominent than the last name "Mosier".

Rodney Mosier, District Supervisor
Environmental Response Division
Shiawassee District Office
(517) 625-4615

RM:JEI:jh

cc: David Leyton, Flint Township Clerk
Alan Howard, MDEQ
Pat Merrick, MDEQ
James Innes, MDEQ