

LONG-TERM MONITORING PLAN

PONTIAC CENTERPOINT CAMPUS PONTIAC, MICHIGAN

MID 005 356 902

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1.0 <u>INTRODUCTION</u>

This Long-Term Monitoring Plan (Plan) describes the groundwater monitoring activities for the General Motors Corporation (GM) Pontiac Centerpoint Campus, located in Pontiac, Michigan (Facility) (MID 005 356 902). GM has conducted a Resource Conservation and Recovery Act (RCRA) Corrective Action pursuant to Consent Order 5-RCRA-013-98 with the United States Environmental Protection Agency (U.S. EPA).

The Facility is located in Sections 3 and 4 of Township T2N, Range R10E, City of Pontiac, Oakland County, Michigan, as presented on Figure 1.1. The Facility encompasses approximately 400 acres of land comprising the Pontiac Centerpoint Campus, including the Pontiac Assembly Center. The Facility was formerly the General Motors Truck Group, Pontiac East Assembly/Former Pontiac Central Manufacturing and Assembly Plants. The Facility is generally bordered by South Boulevard to the north, the Grand Trunk Western Railroad to the south, Opdyke Road to the east, and Martin Luther King Jr. Boulevard to the west. Land use to the north of the Facility is primarily industrial; to the east and south, residential; and to the west, a combination of residential, industrial and commercial. The current Facility Plan is presented on Figure 1.2.

Groundwater monitoring activities at the Facility conducted prior to, during, and following the RCRA Facility Investigation (RFI) are summarized in the Corrective Measures Proposal (CMP) (CRA, 2006a). U.S. EPA and GM signed Consent Order RCRA-05-2007-0009 to implement U.S. EPA's Final Decision and Response to Comments – Selection of Remedial Alternative dated August 3, 2006 (Final Decision). The Final Decision requires groundwater monitoring as part of the final remedy selected for the following two areas of investigation:

- AOI #53 Building 33 Free Product Area; and
- AOI #71 Burn Pile Area.

The Plan includes monitoring of chemical concentrations, groundwater elevations, and the presence of light non-aqueous phase liquid (LNAPL). Monitoring will be performed at certain monitoring wells associated with AOI #53 (former Building 33 Free Product Area) due to prior releases of petroleum hydrocarbons in the area and at AOI #71 (Burn Pile Area) due to impacts associated with historic filling at this area.

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The Final Decision selected closure under MI Act 451 Part 213, the Leaking Underground Storage Tank Program (LUST), as the final remedy for the following areas of investigation:

- AOI #50 Former Duco Stores Tank Farm; and
- AOI #52 Former Building 35 Tank Farm.

Monitoring of the above areas is not specifically required in the Final Decision. However, since GM is conducting LUST-associated monitoring at AOI #52, that monitoring is included here for convenience.

2.0 LONG-TERM MONITORING PLAN

2.1 LONG-TERM MONITORING PROGRAM

The long-term monitoring program includes groundwater monitoring at AOI #53 (former Building 33 Free Product Area) and AOI #71 (Burn Pile Area), which are presented on Figure 2.1.

The following sections present details and the rationale of the monitoring program for each investigation area, including details on monitoring frequency, duration, and parameter list. Table 2.1 presents a summary of the Corrective Measures, which includes the media requiring Corrective Measures, the Corrective Measures selected in the Final Decision, the remediation/monitoring endpoints, and the confirmation of end points. Table 2.2 presents a list of the monitoring wells, constituents for analysis and rationale for each area of investigation. Table 2.3 summarizes the criteria for confirming the remediation endpoints for AOI #53.

2.2 AOI #53 – FORMER BUILDING 33 FREE PRODUCT AREA

2.2.1 SUMMARY OF HISTORICAL INVESTIGATIONS AT AOI #53

AOI #53 is the Former Building 33 Free Product Area. The location of AOI #53 is presented on Figure 2.2. A mixture of a gasoline/diesel LNAPL is located underneath the former Building 33 slab at a depth of approximately 15 to 20 feet below ground surface (bgs) (LNAPL Area 1). This LNAPL was the result of one or more historical petroleum releases. The primary source of the leak is believed to be an underground fuel line that was discovered to be leaking in 1968/1969. The fuel line originated from the Building 35 Dyno Tank Farm (AOI #52), went overhead through Building 35 and then underground to a fuel island south of Building 33 that has since been removed. A number of historical investigations and attempts to recover product were completed from approximately 1985 through the mid-1990s. It was determined at that time that effective LNAPL recovery could not be completed with the building still in place.

When demolition of Building 33 was proposed in 2004, CRA conducted additional environmental subsurface investigations between June 2004 and November 2004 to evaluate then current conditions. During the course of the investigation, a second heavier LNAPL (LNAPL Area 2) was identified in an area just east of LNAPL Area 1. The results of this investigation were reported to the U.S. EPA in the Building 33 Interim Measures Investigation Summary Report (CRA, 2005).

Between December 2004 and February 2005, GM conducted a remedial pilot study to evaluate the effectiveness of using a high vacuum multi-phase extraction (MPE) system to remediate LNAPL Area 1. LNAPL was extracted from eight existing monitoring wells between December 7, 2004 and February 15, 2005. Approximately 3,097 gallons of LNAPL equivalent were recovered from all three phases (vapor-phase, dissolved-phase, and free-phase) during the pilot study. The results of the remedial pilot study are summarized in the Building 33 Pilot Study Report (CRA, 2006b), which indicated that a full-scale MPE system would be an effective remedial technology for LNAPL Area 1. The building was subsequently demolished in December 2005 and all of the historical monitoring wells were abandoned prior to the demolition.

As discussed in the CMP, 33 extraction wells and 12 LNAPL perimeter monitoring wells were installed for the full-scale MPE system in July and August 2006. Operation of the MPE system commenced on September 6, 2006. In September, October, and November 2007, six groundwater perimeter monitoring wells and thirteen additional LNAPL perimeter wells were installed.

Operation of the MPE system is expected to continue until product recovery is no longer practical. As discussed in the CMP and the Final Decision, the criteria for ending the operation of the MPE System will be when the product recovery curve becomes asymptotic and product recovery is no longer practical. As stated in the Final Decision, when recovery no longer appears practical, GM and U.S. EPA will agree on when to end operation of the MPE system.

2.2.2 PROPOSED GROUNDWATER MONITORING AT AOI #53

As outlined in the CMP and summarized in Table 2.1, soil, groundwater, LNAPL, and smear zone soil have been identified as requiring Corrective Measures. The soil will be monitored at the completion of remediation to determine if unacceptable health or explosion hazards exist or if additional institutional controls and/or engineering controls are necessary. To evaluate the dissolved phase groundwater plume, ten monitoring wells will be sampled semi-annually during operation of the MPE system and for two years after system shutdown to ensure that VOC concentrations are either stable or decreasing. The ten monitoring wells are MW33-21R, MW33-27R, MW33-30R, MW33-34, MW33-35, MW33-36, MW35-7, MW35-8, MW35-14, and MW35-15, which are presented on Figure 2.2. One groundwater sample will be collected from each monitoring well identified above and analyzed for select VOCs (benzene, toluene, ethylbenzene, xylene, methyl tertiary butyl ether, and trimethyl benzene isomers). Field

and laboratory quality control samples will also be collected and analyzed. Groundwater elevations in the wells will also be monitored to evaluate the groundwater flow direction.

During the operation of the MPE system and for six months after system shutdown, a minimum of 26 perimeter LNAPL recovery wells will be monitored at least monthly for the presence of LNAPL in LNAPL Area 1 and LNAPL Area 2 to ensure that the LNAPL is not moving beyond the defined boundary. These wells are also presented on Figure 2.2.

In addition, after shutdown of the MPE system, select recovery wells within the LNAPL zone will be monitored to determine the amount of LNAPL and vapor recharge after the system is shut off by measuring the headspace of each recovery well and the in-well thickness of the LNAPL. These activities will be performed monthly for the first 6 months after shutdown of the MPE system and semi-annually for the balance of the two years.

2.3 <u>AOI #71 – BURN PILE AREA</u>

2.3.1 SUMMARY OF HISTORICAL INVESTIGATIONS AT AOI #71

AOI #71 is the Burn Pile. The location of AOI #71 is presented on Figure 2.1. The Burn Pile resulted from historic filling operations. Several investigations and excavations were completed in the mid-1990s to support redevelopment of the Facility. A summary of the historical activities is presented in the Summary Report - Burn Pile (CRA, 1995).

CRA conducted additional investigations at the Burn Pile from August 13, 2004 to July 25, 2005, from February 9, 2006 to April 5, 2006, and from June 20, 2006 to August 21, 2006. The results of these investigations are presented in the Burn Pile Phase 3 Investigation Report and Phase 4 Work Plan (CRA, 2006c) and the Burn Pile Phase 4 and Phase 5 Investigation Report (CRA, 2006d).

2.3.2 PROPOSED GROUNDWATER MONITORING AT AOI #71

As discussed in the CMP and summarized in Table 2.1, groundwater and LNAPL have been identified as requiring Corrective Measures. Eight groundwater monitoring wells will be sampled semi-annually for 2 years to confirm dissolved phase VOC stability, as presented in Table 2.2. The monitoring wells in the monitoring program include: MW-111, MW-112, MW-113, MW-114, MW-115, MW-116, MW-117, and MW-119, which are presented on Figure 2.3. Each of these wells will be sampled to confirm that impacted groundwater is stable and not migrating beyond the extent of the Burn Pile area. Monitoring well MW-119 will be sampled if sufficient groundwater is present to confirm that impacted groundwater is not migrating into the utility backfill in the area. One groundwater sample will be collected from each monitoring well identified above and analyzed for TCL VOCs. Field and laboratory quality control samples will also be collected and analyzed. Groundwater elevations will be monitored in the wells to evaluate the groundwater flow direction.

Monitoring well MW-1 will be monitored for LNAPL and any observed LNAPL will be passively recovered for the duration of the monitoring program.

2.4 <u>SAMPLING AND ANALYTICAL PROCEDURES</u>

Laboratory analysis and data validation will be conducted in accordance with the Amended Quality Assurance Project Plan (QAPP), which will be submitted under separate cover. Full data validation will be performed only during the initial groundwater sampling event at each location. Reduced data validation will be performed during all subsequent groundwater sampling events. The monitoring program will be evaluated annually to determine if changes to the program are warranted. Any major changes to the Plan will be proposed to the U.S. EPA for approval through the Annual Groundwater Monitoring Report.

3.0 GROUNDWATER MONITORING UNDER ACT 451, PART 213, THE MI LUST PROGRAM

The Final Decision selected closure under the MI LUST Program for AOI #50 - Former DUCO Stores Tank Farm and AOI #52 - Building 35 Tank Farm (Dyno Tanks). While the Final Decision did not require monitoring for these areas, the LUST-associated monitoring at AOI #52 is being included here for convenience. The location of this AOI is presented on Figure 3.1.

3.1 AOI #52 - FORMER BUILDING 35 TANK FARM

AOI #52 is the former Tank Farm that was installed in 1946 west of Building 35. The location of AOI #52 is presented on Figure 3.1. The tank farm consisted of six 2,000-gallon USTs (Dyno Tanks 1 through 6) and two 12,000-gallon USTs (Dyno Tanks 7 and 8). In addition, there was also one 10,000-gallon UST that was in the same tank cavity as Dyno Tanks 7 and 8, which was replaced by one of the 12,000-gallon tanks.

In September 1994, Dyno Tanks 1 through 6 were removed. From September 1994 to October 1994, 1,694 cubic yards (cy) of impacted soil were removed. In July 2005, Dyno Tanks 7 and 8 were removed. A sheen was identified on the groundwater in the UST cavity. Subsequent analytical results from a September 2005 investigation confirmed the release (MDEQ Release Number C-0202-05). Additional investigations were conducted in June, November, and December 2006 that delineated the nature and extent of groundwater impacts in the vicinity of the former Building 35 tank farm. The results of these investigations are presented in the Final Assessment Report (FAR), which was submitted to the MDEQ and U.S. EPA on January 20, 2007 (CRA, 2007).

As presented in the FAR, quarterly monitoring, for one year, was initiated in June 2007. Groundwater samples are/will be analyzed for PNAs, select VOCs (benzene, toluene, ethylbenzene, xylene, methyl tertiary butyl ether, and trimethyl benzene isomers), and total lead. At the end of the 1 year of quarterly monitoring, a Closure Plan will be submitted to the MDEQ or a recommendation for further monitoring will be made to the MDEQ. The locations of the monitoring wells that are monitored quarterly are presented on Figure 3.2.

4.0 <u>REPORTING</u>

Each year, an Annual Report will be prepared and submitted to U.S. EPA by March 1, as required by the Order. The reports will contain a discussion of field activities (groundwater sampling, groundwater elevation monitoring, LNAPL gauging) and a presentation of analytical results. Data will be compared to historical groundwater and LNAPL data in each area for the purpose of verifying stability of the groundwater and LNAPL impacts in each area. Data evaluation and any recommendations for changes to the Plan will be included in the Annual Report, as necessary.

This groundwater monitoring program and reporting are proposed to be conducted during operation of the MPE system and for the two years following system shutdown. At the end of the second year after shutdown, GM will re-evaluate the entire Plan and propose modifications or termination of monitoring if the end points in Table 2.1 have been met. Changes to the Plan prior to the end of year two may also be proposed if appropriate based on data collected under the Plan.

5.0 <u>REFERENCES</u>

- CRA, 2007. Final Assessment Report, Building 35 Dyno Tanks 7 and 8.
- CRA, 2006a. Corrective Measures Proposal.
- CRA, 2006b. Building 33 Pilot Study Report.
- CRA, 2006c. Burn Pile Phase 3 Investigation Report and Phase 4 Work Plan.
- CRA, 2006d. Burn Pile Phase 4 and Phase 5 Investigation Report.
- CRA, 2005. Building 33 Interim Measures Investigation Summary Report.
- CRA, 2000. RCRA Facility Investigation Report.
- CRA, 1998. Building 34 Excavation Summary Report.
- CRA, 1994. DUCO Stores Study Area Final Report.
- CRA, 1995. Summary Report Burn Pile.



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07097-10(057)GN-WA003 NOV 22/2007





07097-10(057)GN-WA005 NOV 22/2007



07097-10(057)GN-WA004 NOV 22/2007









LEGEND

MW35-1-05 ABANDONED MONITORING WELL (6/8/06)

MW35-3-05 MONITORING WELL LOCATIONS

RECOVERY WELL LOCATIONS (COMPLETED FOR BLDG 33)

STORM SEWER LINE

SANITARY LINE

FENCE LINE

HISTORIC USTs

HISTORIC STRUCTURES

RETAINING WALL

QUARTERLY GROUNDWATER SAMPLING LOCATION UNDER ACT 451 PART 213

figure 3.2

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GROUNDWATER MONITORING LOCATIONS UNDER MI LUST PROGRAM - AOI #52 LONG - TERM MONITORING PLAN GM PONTIAC CENTERPOINT CAMPUS Pontiac, Michigan

CORRECTIVE MEASURES SUMMARY GM PONTIAC CENTERPOINT CAMPUS PONTIAC, MICHIGAN

	Media Requiring		Remediation/Monitoring	Confirmation of		
Area	Corrective Measures	Proposed Corrective Measures	End Point	End Point		
AOI 50 (DUCO Stores)		NA - Closure through MDE	Remediation/Monitoring End Point Confirmation of End Point NA - Closure through MDEQ UST program as stated in Section 9 of the CMP (CRA 2006) End Point NA - Closure through MDEQ UST program as stated in Section 9 of the CMP (CRA 2006) Mass recovery until no longer practical Cumulative MPE recovery curve reaches asymptotic f product and constituent mass i and LT Monitoring to attempt to product and constituent mass i and LT Monitoring to attempt to controls No health or explosive hazards cist or implementation of institutional and/or engineering controls Monitoring of soil for two years, at locations to be determin following completion of remediation, which demonstrate n explosive hazards (i.e., below the levels in Table 3.3) or implementation of institutional and/or engineering controls No potable shallow GW use (Deed serstriction filed with Gakland County Register of backards do not exist in dissolved able No potable shallow GW use (Deed) Following completion of remediation, semi-annual monitor at wells identified on Figure 3.1 which demonstrate no heal exist or implementation of institutional and/or engineering controls ring to determine health or azards do not exist in dissolved able Dissolved plume stable Following completion of remediation, semi-annual monitor at wells identified on Figure 3.1 which demonstrate to be every of LNAPL during MPE ring to determine dissolved able Dissolved plume stable Following completion of remediation, semi-annual monitor at wells identified on Figure 3.1 which demonstrate tor institutional and/or engineering controls <tr< td=""></tr<>			
	LNAPL Plume 1 unacceptable risk estimates for contact	Removal of product and constituent mass using MPE	Mass recovery until no longer practical	Cumulative MPE recovery curve reaches asymptotic		
	Soil exceeding vapor intrusion criteria	Removal of product and constituent mass using MPE and LT Monitoring to attempt to eliminate health hazard	No health or explosive hazards exist or implementation of	Monitoring of soil for two years, at locations to be determined following completion of remediation, which demonstrate no health or explosive bazards (i.e., below the levels in Table 3.3) or		
	Smear Zone Soil potential explosive hazard	Removal of product and constituent mass using MPE and LT Monitoring to attempt to eliminate explosive hazard	institutional and/or engineering controls	implementation of institutional and/or engineering controls to prevent health or explosive hazards		
AOI 53 (Building 33) - Plume 1	GW exceeding drinking water criteria	Institutional controls to prevent potable use of shallow GW	No potable shallow GW use (Deed restriction filed with Oakland County Register of Deeds)	Implementation of institutional controls to prevent potable use of shallow GW (Recorded copy of deed restriction received by USEPA)		
Plume 1	Absence of data on potential hazards from dissolved GW	LT Monitoring to determine health or explosive hazards do not exist in dissolved plume	No health or explosive hazards exist or implementation of institutional and/or engineering controls	Following completion of remediation, semi-annual monitoring of GW at wells identified on Figure 3.1 which demonstrate no health or explosive hazards (i.e., below the levels in Table 3.3) based on data from four consecutive events or implementation of institutional and/or engineering controls to prevent health or explosive hazards or different time intervals agree upon with USEPA		
	Absence of data on dissolved GW plume stability	LT Monitoring to determine dissolved plume is stable	Dissolved plume stable	Following completion of remediation, semi-annual monitoring of GW at wells identified on Figure 3.1 which demonstrate stable or decreasing concentrations for total VOCs based on data from four consecutive events or different time intervals agreed upon with USEPA		
AOI 53 (Building 33) - Plume 2	LNAPL Plume 2 no unacceptable risk estimates identified for contact or vapor intrusion	Passive recovery of LNAPL during MPE operation	Passive recovery of LNAPL until MPE operation complete	Cumulative MPE recovery curve for LNAPL Plume 1 reaches asymptotic		
	GW exceeding drinking water criteria	Institutional controls to prevent potable use of shallow GW	No potable shallow GW use (Deed restriction filed with Oakland County Register of Deeds)	Implementation of institutional controls to prevent potable use of shallow GW (Recorded copy of deed restriction received by USEPA)		
	Absence of data on potential hazards from dissolved GW	LT Monitoring to determine health or explosive hazards do not exist in dissolved plume	No health or explosive hazards exist or implementation of institutional and/or engineering controls	Following completion of remediation, semi-annual monitoring of GW at wells identified on Figure 3.1 which demonstrate no health or explosive hazards (i.e., below the levels in Table 3.3) based on data from four consecutive events or implementation of institutional and/or engineering controls to prevent health or explosive hazards or different time intervals agree upon with USEPA		
	Absence of data on dissolved GW plume stability	LT Monitoring to determine dissolved plume is stable	Dissolved plume stable	Following completion of remediation, semi-annual monitoring of GW at wells identified on Figure 3.1 which demonstrate stable or decreasing concentrations for total VOCs based on data from four consecutive events or different time intervals agreed upon with USEPA		

CORRECTIVE MEASURES SUMMARY GM PONTIAC CENTERPOINT CAMPUS PONTIAC, MICHIGAN

	Media Requiring		Remediation/Monitoring	Confirmation of
Area	Corrective Measures	Proposed Corrective Measures	End Point	End Point
			No direct contact with LNAPL	
	LNAPL and GW	Institutional controls to prevent exposure to	or GW (Deed restriction filed	Implementation of institutional controls to prevent exposure to
	unacceptable risk	LNAPL and GW (passive LNAPL recovery	with Oakland County Register of	LNAPL and GW (Recorded copy of deed restriction received by
	estimates identified	during GW monitoring)	Deeds) and no further recovery	USEPA); passive recovery ends when GW monitoring ends
			of LNAPL	
			No potable shallow GW use	
AOI 71 (Burn Pile)	GW exceeding drinking	Institutional controls to prevent potable use	(Deed restriction filed with	Implementation of institutional controls to prevent potable use of
	water criteria	of shallow GW	Oakland County Register of	shallow GW (Recorded copy of deed restriction received by USEPA)
			Deeds)	
	Existing data show GW			Semi-annual monitoring of GW at wells identified on Figure 3.2
	plume stability (i.e.,	LT Monitoring to determine dissolved	Dissolved plume stable	which demonstrate stable or decreasing concentrations for total
	stable or decreasing	plume is stable		VOCs based on data from four consecutive events or different time
	trend)			intervals agreed upon with USEPA

LONG-TERM GROUNDWATER SAMPLING PROGRAM GM PONTIAC CENTERPOINT CAMPUS PONTIAC, MICHIGAN

AOI #53 - Former Building 33 Free Product Area

Well ID	Chemical Monitoring	Analysis Parameters	Frequency	Rationale
MW33-21R	\checkmark	BTEX, MTBE, TMBs	Semi-Annual	Groundwater perimeter monitoring
MW33-27R	\checkmark	BTEX, MTBE, TMBs	Semi-Annual	Groundwater perimeter monitoring
MW33-30R	\checkmark	BTEX, MTBE, TMBs	Semi-Annual	Groundwater perimeter monitoring
MW33-34	\checkmark	BTEX, MTBE, TMBs	Semi-Annual	Groundwater perimeter monitoring
MW33-35	\checkmark	BTEX, MTBE, TMBs	Semi-Annual	Groundwater perimeter monitoring
MW33-36	\checkmark	BTEX, MTBE, TMBs	Semi-Annual	Groundwater perimeter monitoring
MW35-7	\checkmark	BTEX, MTBE, TMBs	Semi-Annual	Groundwater perimeter monitoring
MW35-8	\checkmark	BTEX, MTBE, TMBs	Semi-Annual	Groundwater perimeter monitoring
MW35-14	\checkmark	BTEX, MTBE, TMBs	Semi-Annual	Groundwater perimeter monitoring
MW35-15	\checkmark	BTEX, MTBE, TMBs	Semi-Annual	Groundwater perimeter monitoring

AOI #71 - Burn Pile Area

Well ID	Chemical Monitoring	Analysis Parameters	Frequency	Rationale
MW-111	\checkmark	TCL VOCs	Semi-Annual	Groundwater perimeter monitoring
MW-112	\checkmark	TCL VOCs	Semi-Annual	Groundwater perimeter monitoring
MW-113	\checkmark	TCL VOCs	Semi-Annual	Groundwater perimeter monitoring
MW-114	\checkmark	TCL VOCs	Semi-Annual	Groundwater perimeter monitoring
MW-115	\checkmark	TCL VOCs	Semi-Annual	Groundwater perimeter monitoring
MW-116	\checkmark	TCL VOCs	Semi-Annual	Groundwater perimeter monitoring
MW-117	\checkmark	TCL VOCs	Semi-Annual	Groundwater perimeter monitoring
MW-119*	✓	TCL VOCs	Semi-Annual	Confirmation that groundwater in utility backfill is not impacted

Notes:

* Chemical monitoring will be performed semi-annually if sufficient groundwater is present to collect a sample.

BTEX Benzene, Ethylbenzene, Toluene, and Xylene

MTBE Methyl Tertiary Butyl Ether

TCL VOCs Target Compound List Volatile Organic Compounds

TMBs Trimethylbenzenes

BUILDING 33 CLEANUP CRITERIA SUMMARY GM PONTIAC CENTERPOINT CAMPUS PONTIAC, MI

			Soil Concentrations that would Necessitate Additional Deed		Groundwater	
Chemical					Concentrations that would Necessitate Additional Deed	l Ducia
Group	Chemical	CASKN	(mg/kg)	Basis	(mg/L)	Basis
VOC	Benzene	71-43-2	8.3E+01	VI	4.2E+00	SSCW
VOC	Ethyl Benzene	100-41-4	5.1E+02	LEL	2.2E+02	LEL
VOC	Toluene	108-88-3	3.7E+02	LEL	2.1E+02	SSCW
VOC	1,2,4-Trimethylbenzene	95-63-6	1.5E+03	VI	4.0E+00	SSCW
VOC	1,3,5-Trimethylbenzene	108-67-8	1.0E+03	VI	4.0E+00	SSCW
VOC	Xylenes (total)	1330-20-7	7.0E+02	LEL	6.1E+01	SSCW
SVOC	2-Methylnaphthalene	91-57-6	2.3E+04	SSCW	2.1E+00	SSCW
SVOC	Naphthalene	91-20-3	2.0E+04	VI	2.5E+00	SSCW

Notes:

VI = Indoor Air Vapor Inhalation Risk-Based Criteria SSCW = Small Scale Construction Worker Risk-Based Criteria LEL = Lower Explosive Limit