

DRAFT FOR REVIEW

HAZMAT TRANSPORTATION SECURITY PLAN

**Remediation Waste Activities
Former Willow Run Assembly Plant
Ypsilanti, MI**

MIK 468293311

Prepared For:

ENCORE

OCTOBER 2, 2007

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LIST OF ACRONYMS

CRA	Conestoga-Rovers & Associates
CVO	Company Vehicle Operations
DOT	Department of Transportation
ENCORE	Environmental Corporate Remediation
GM	General Motors Corporation
HMTSP	Hazardous Materials Transportation Security Plan
HazMat	Hazardous Materials
NAPL	Non Aqueous Phase Liquids
PCBs	Polychlorinated Biphenyls
PPE	Personal Protective Equipment
RCRA	Resource Conservation and Recovery Act
SPO	Service Parts Operations
U.S. EPA	United States Environmental Protection Agency
WRBC	Willow Run Business Center

1.0 INTRODUCTION

This Hazardous Materials Transportation Security Plan (HMTSP) has been prepared for remediation waste generated during ongoing environmental investigations and remedial actions at the Company Vehicle Operations (CVO) and Willow Run Business Center (WRBC) in Ypsilanti, Michigan (Site). This HMTSP has been developed by Conestoga-Rovers & Associates (CRA) for Environmental Corporate Remediation (ENCORE), a wholly owned subsidiary of General Motors Corporation (GM) to document the procedures used and measures put in place to secure hazardous materials (HazMat) transported from the Site. The HMTSP includes procedures for identifying and minimizing transportation security risks for HazMat shipped from the Site, and also covers security HazMat being prepared for off-Site shipment. This HMTSP has been prepared to meet the requirements established by the United States Department of Transportation (DOT) in 49 CFR, Part 172, Subpart I, § 172.800 and § 172.802.

This HMTSP specifically applies to Site activities where the shipments of HAZMAT are:

- In bulk packaging exceeding 13,248 liters (3,500 gallons) for liquids or gases or more than 13.42 cubic meters (468 cubic feet or 17.3 cubic yards) for solids;
- Shipped in other than bulk packaging of 2,268 kg (5,000 lbs) gross weight or more of one class of hazardous materials for which placarding of a vehicle, rail car or freight container is required; or
- Quantities of HAZMAT that requires placarding under 49 CFR Subpart F, § 172.500.

These procedures have been specifically developed for remediation sites, where the types and quantities of HazMat that are shipped are generally limited and are the result of investigation and/or cleanup activities to address impacted environmental media.

2.0 REMEDIAL SITE INFORMATION

2.1 SITE LOCATION AND DESCRIPTION

The Site is located in Ypsilanti, Michigan and includes the former Willow Run Assembly Plant property. The Site is currently made of two properties. The eastern portion, CVO, located at 2901 Tyler Road is owned by GM and operated by QEK. The western portion, WRBC, located at 2625 Tyler Road is owned by InSite Real Estate Development LLC but GM retains environmental liability for impacts related to activities during their ownership. At the time that this HMTSP was prepared, the WRBC does not generate hazardous waste; therefore shipments of HazMat may be associated with ENCORE environmental remediation activities at the CVO location only, although security measures will be similar at the WRBC.

2.2 SUMMARY OF REMEDIAL ACTIVITIES

Remedial activities are being conducted at the Site voluntarily under Michigan Act 451 Part 201 clean-up program. In this document, the term "HazMat" refers to both hazardous materials and hazardous wastes.

The main contaminants present at the Site are chlorinated volatile organic compounds such as trichloroethylene and its daughter compounds including cis-1,2-dichloroethene, trans-1,2-dichloroethene and vinyl chloride. Polychlorinated biphenyls (PCBs) have also been detected in some recovered liquid wastes at the CVO property. Lead has also been detected at elevated levels in soil at the Site. These types of wastes are hereby referred to as "constituents". Remedial activities being conducted include groundwater monitoring, drilling, subsurface soil sampling, well installation, product recovery and test pitting sampling. In addition, pilot testing of remedial technologies, such as in-situ chemical oxidation and/or enhanced biodegradation, may also be completed as deemed necessary.

2.3 DESCRIPTION OF HAZMAT

Remedial activities conducted at the Site may result in the generation of HazMat in quantities that require placarding under 49 CFR Part 172, Subpart F when shipped off Site for proper disposal. The HazMat generated at the Site or that may be generated at the Site, which requires placarding for transportation includes the following:

- Personal protective equipment (PPE) and disposable sampling equipment contaminated with constituents (Hazard Class 9);
- Recovered non aqueous phase liquids (NAPL) (Hazard Class 9);
- Soil contaminated with constituents (Hazard Class 9);
- Debris (e.g., concrete, asphalt, clay pipe, metal pipe, etc.) contaminated with constituents (Hazard Class 9); and
- Water (e.g., groundwater, decontamination water, etc.) containing constituents (Hazard Class 9).

The HazMat transported from the Site typically contain relatively low levels of hazardous constituents, and are being generated and managed as a result of remedial activities.

2.4 GENERAL RISK ASSESSMENT

The potential security risks presented by the transportation of HazMat from the Site are low. These HazMat do not contain sufficient quantities of any constituent that would be considered a target for terrorist or other covert activities (not explosives; poisonous gases; flammable gases, liquids or solids; oxidizers; poisons; radioactives; or corrosives). The more significant concern regarding the transportation of these HazMat are potential vandalism related to breaches of security at the Site and potential accidents during transport. Provisions to minimize unauthorized access to the Site and help secure the HazMat during transport from the Site are described in Sections 4.0 and 5.0.

3.0 **PERSONNEL SECURITY**

Consultant/contractor personnel are expected to report suspicious activities to their immediate supervisor and/or the project manager. In addition, CRA and ENCORE's project manager for the Site should be contacted. Local law enforcement officials may be contacted by Site personnel or by ENCORE's project manager. For examples of suspicious activities, please see Appendix A.

All CRA Inc. employees are subject to background checks before being offered employment. Therefore, no additional security measures are proposed for CRA employees that may have access to (or, on limited occasions, potentially be required to handle) HazMat at the Site.

Most activities implemented at the Site pertaining to HazMat are conducted by consultants and contractors that are carefully screened, evaluated, and selected by ENCORE/GM. These consultants and contractors enter into contractual agreements with ENCORE/GM that include conditions related to assignment of qualified personnel and meeting all regulatory requirements as they pertain to the activities conducted under the contracts. These activities may include the signing of HazMat shipping papers and acting as ENCORE/GM's representative when HazMat is loaded for shipment for off-Site disposal. Based on the relatively low risk represented by the HazMat that may be present at the Site, detailed background screening of consultant and contractor personnel will not be conducted by ENCORE/GM. However, each consultant/contractor must still meet any and all contractual obligations related to the work performed or services provided.

4.0 UNAUTHORIZED ACCESS/SECURITY INSPECTIONS

HazMat storage for off-Site shipment occurs inside the fenced property in the waste management area located in the center of the Site at CVO and in the north section of the WRBC behind a fenced enclosure. The CVO property is illustrated in Figure 4.1 and the WRBC is illustrated in Figure 4.2.

Only authorized personnel will be allowed to access those portions of the Site where HazMat is managed for off-Site shipment. Vendors/suppliers will not be left unaccompanied in any area where HazMat is being managed for off-Site shipment. Refer to Appendix B1 for security inspections for areas where HazMat is prepared for off-Site shipment. The inspections can be documented using the form in Appendix B2.

5.0 IN ROUTE SECURITY

HazMat transportation from the Site is contracted to waste management companies that are carefully screened, evaluated, and selected by ENCORE/GM. These waste management companies enter into contractual agreements with ENCORE/GM that include conditions related to assignment of qualified personnel and meeting all regulatory requirements as they pertain to the activities conducted under the contracts. Based on the relatively low risk represented by the HazMat that may be shipped from the Site, detailed background screening of waste management company personnel will not be conducted by ENCORE/GM or CRA. However, each waste management company must still meet any and all contractual obligations related to the work performed or services provided.

As part of the profile approval process, a waste management company is provided with detailed information about the HazMat associated with the Site. Each waste management company used to ship HazMat from the Site that requires placarding will provide a letter certifying that it meets DOT security requirements and provide a copy of the company's HMTSP.

If the transportation of HazMat from the Site is subcontracted by a waste management company, only ENCORE/GM-approved transporters are to be used. The transporter will also be required to provide a copy of their HMTSP. These transporters are carefully screened and evaluated by ENCORE/GM. All HazMat shipments from the Site are currently being performed by an ENCORE/GM-approved waste management company and/or an ENCORE/GM-approved transporter. ENCORE/GM does not currently own, operate, or lease any vehicles used for the off-Site shipment of HazMat from the Site. This plan must be revised if the use of ENCORE/GM fleet vehicles is considered in the future.

6.0 TRAINING

CRA employees and consultant/contractor personnel involved with transportation of HazMat from the Site are required to meet certain security training requirements including: (1) general security awareness training¹ and (2) security training specific to the Site (i.e., this HMTSP).

Training related to this HMTSP must be completed by current personnel and new personnel before managing HazMat for off-Site shipping at the Site. This training will be documented using the sign-off sheet in Appendix C. A copy of the most recent certification of DOT HazMat transportation training for project personnel is provided in Appendix D. Additional sign-off sheets and HazMat transportation training certificates shall be retained in the CRA project file.

¹ See 49CFR Part 172, Subpart H, S172.700

7.0 **PLAN REVISIONS AND UPDATES**

The HMTSP should be updated and revised as necessary to reflect any significant changes in Site conditions that may impact the security of HazMat transportation. This includes significant changes in the nature of the HazMat generated at the Site.

Updated versions of the HMTSP will include the date of the most recent revision and indicate a revision number. The revised HMTSP will be placed in the facility files at the Site, placed in CRA and ENCORE's project files, and distributed to the personnel involved with HazMat transportation for review. Previous versions of the plan will be not be kept on Site, but CRA and GM project files will maintain one copy of each version of the plan in its project files for long-term documentation purposes.

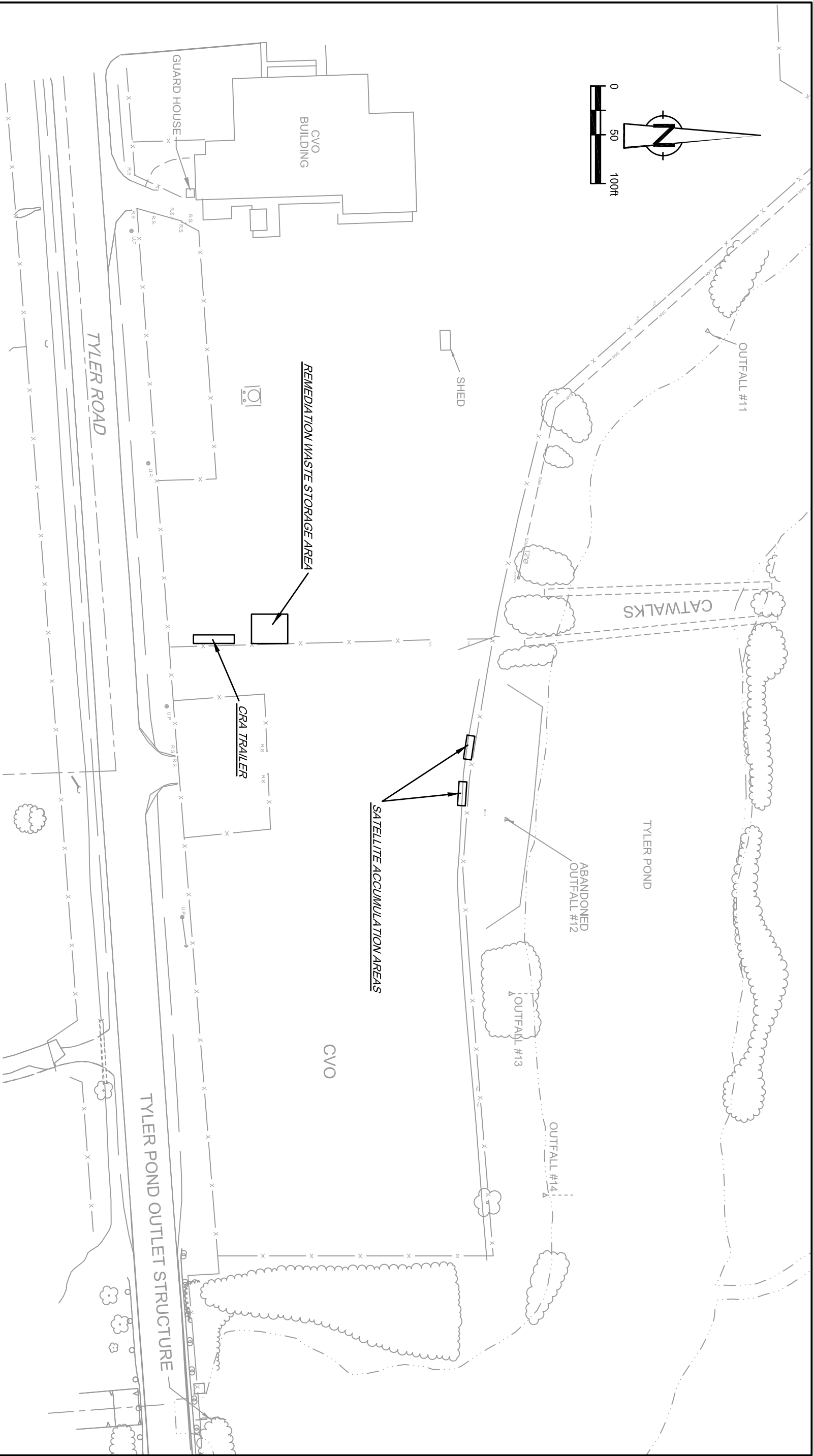
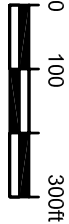
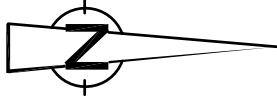


figure 4.1

SITE LAYOUT
GM COMPANY VEHICLE OPERATIONS AREA
HAZMAT TRANSPORTATION SECURITY PLAN
Ypsilanti, Michigan





LEGEND

- DITCH, STREAM OR RIVER
- FENCE LINE
- TREE LINE
- BUILDING
- PROPERTY LINE

figure 4.2

WILLOW RUN BUSINESS CENTER
 HAZMAT TRANSPORTATION SECURITY PLAN
Ypsilanti, Michigan



APPENDIX A

EXAMPLES OF SUSPICIOUS ACTIVITY

Appendix A: Examples of Suspicious Activity

Suspicious activity includes, but is not limited to, any of the following situations:

- Unidentified person(s) attempting to gain access to property, equipment, or facilities.
- Unidentified person(s) in any area of the company, office, yard, or parking lot.
- Any person (employee or otherwise) found visiting a part of an office, plant, facility or site for unknown or suspicious reasons.
- Any person (employee or otherwise) found wandering on WRBC/CVO property.
- Any person (employee or otherwise) who appears to be hiding something or is acting nervous, anxious, or secretive.
- Any employee or visitor making unusual or repeated requests for sensitive or important company documents or information.
- Any person asking an employee to make any unauthorized movement (pick-up and delivery) for cash (motor carrier specific).
- Any person or group loitering outside a company facility or premises.
- Any person claiming to be a representative of a utility (gas, water, electric) but cannot produce valid company identification.
- Uniformed delivery personnel using a private vehicle, or carrying suspicious company credentials.
- Any person observed carrying a weapon such as a gun or knife.
- During hours of darkness, any vehicle driving slowly by a company facility with the headlights off.
- Any occupied vehicle parked outside a company facility, especially if the vehicle has been sitting for a long period or after normal work hours.
- A vehicle that appears to be abandoned, and is parked near a company building, parking lot or adjacent to WRBC/CVO property.

APPENDIX B1

SECURITY INSPECTIONS

Appendix B1: Security Inspections

Security inspections shall be conducted for all placardable amounts of HazMat prepared for off-site shipment. The inspection shall include details such as the dates, times, specific locations, names of persons inspecting and comments. Inspection frequency shall be weekly whenever HazMat is present at the Site designated for off-site shipping.

Waste will be inspected weekly as part of LQG (large quantity generator) status. The checklist in Appendix B2 can be used to document the HazMat security inspections conducted at the Site. Alternatively, other inspection logs used at the Site can be used, provided they include, or are modified to include, similar information. All records of inspections shall be kept in the facility files at that particular location of the Site for a period of time, not less than one year. Old checklists shall be maintained in the CRA project file for inclusion in the project files for long-term documentation purposes.

APPENDIX B2

REQUIRED WEEKLY HAZARDOUS WASTE MAINTENANCE INSPECTION CHECKLIST

REQUIRED WEEKLY HAZARDOUS WASTE MAINTENANCE INSPECTION CHECKLIST

MONTH: YEAR:																				
WEEK #	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4
Labeled																				
Dated																				
Containers Closed																				
Spills																				
Containment																				
Corrective Measures																				
Date																				
Initials																				

On the back, write comments on any areas below that were not in compliance (include the date).

- Labeled: Check that all drums and all other containers are properly labeled (“Hazardous Waste” and waste number).
If satellite container, check if label has “Hazardous Waste” and either waste number or chemical name, or it can have both.
- Dated: Check to see if the container has the date listed when waste was first put in the container, and confirm the date on the container has not exceeded 90 days for Large Quantity Generator, or 180 days for Small Quantity Generator, which ever is applicable. If the date on the container has exceeded 90 days or 180 days, contact management.
If it was a satellite container, check if the date was listed when the containers from that satellite area reached the maximum amount, either 55 gallons non acute, or 1 quart acute or severely toxic, hazardous waste.
- Containers Closed: Make sure that containers are closed (e.g.. both bungs are in drums, drum ring top is secure, funnel tops closed, funnel valve closed, or tarp over roll-off box).
- Spills: Check that all containers are not leaking, bulged, or in poor condition. Are spills or staining present? If so, contact management.
- Containment: Make sure that there hasn’t been any degradation to the secondary containment, (e.g., any cracks, is coating sufficient?)
Is there enough set back distance of containers for squirt protection? Are all containers in the containment area?
- Corrective Measures: Are corrective measures needed and taken? Record details on the back.
- Date & Initials: Inspector dates and initials.

Revised 5/2006. Use of this DEQ WHMD checklist is optional, but Large Quantity Generators are required to have written inspection records and all others are encouraged to have written records. Written records are required for regulated waste tanks. Keep records at least 3 years.

See [Part 111 of Act 451 of 1994 administrative rule](#) R 299.9306(1)(a)(i), 306(2), and Chapter 2 of the [MDEQ Michigan Manufacturers' Guide to Environmental Safety, and Health Regulations](#) for more information.

APPENDIX C

TRAINING ACKNOWLEDGEMENT FORM

Appendix C: Training Acknowledgement Form

HazMat Transportation Security Plan – Remediation Activities

Willow Run Business Center & Company Vehicle Operations

Ypsilanti, Michigan

Date: September 25, 2007

Version 1

I acknowledge I have been informed and reviewed the remediation activities Hazardous Materials Transportation Security plan for the Former Willow Run Assembly Plant Site including the Company Vehicle Operations and Willow Run Business Center properties. I have read and understand the procedures contained therein, and I accept the policy as a working document that I will support and follow in my daily work.

Name	Company	Telephone	E-Mail

APPENDIX D

HAZMAT TRANSPORTATION AND RCRA WASTE MANIFEST TRAINING CERTIFICATES

Appendix D: HazMat Transportation and RCRA Waste Manifest Training Certificates

A copy of the most recent certification of DOT HazMat transportation training is included for each person authorized to manage HazMat for off-Site shipping. These personnel have received training in the HMTSP for the Site and the clearance roster is presented in Appendix C.



CONESTOGA-ROVERS & ASSOCIATES

Certifies that

Beth Landale

has successfully completed the requisite training requirements for

***Hazardous Materials Transportation
including RCRA Waste Manifesting***

In accordance with DOT 49 CFR 172.704 & RCRA 40 CFR part 262/263
and in evidence thereof is awarded this

Certificate of Completion

on this 27th day of September, 2005

Christopher B. Andrews

Christopher B. Andrews, CET
Manager, Health and Safety Training

CRA Course # EHS - 018
Certificate Number 00.00.05-001



CONESTOGA-ROVERS & ASSOCIATES

Certifies that

Justin Jacques

has successfully completed the requisite training requirements for the

Hazardous Materials Transportation

including RCRA Waste Manifesting

In accordance with DOT 49 CFR 172.704 & RCRA 40 CFR Part 262/263
in evidence thereof is awarded this

Certificate of Completion

on this 3rd-4th day of May, 2007

Christopher B. Andrews

Christopher B. Andrews, CET
Manager, Health and Safety Training

CRA Course # EHS-018/019
Certificate Number 05.03-04.07 - 10
Windsor

CERTIFICATE OF COMPLETION

This certifies that

Beth Landale

has completed 3.1 CEU (31 hours) of training on the RCRA hazardous waste regulations.

Courses completed are entitled:

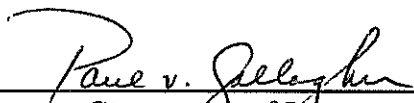
**RCRA Fundamentals
Critical Generator Issues
Advanced RCRA Topics I
Advanced RCRA Topics II and Land Disposal Restrictions I
Land Disposal Restrictions II**

Training provided by

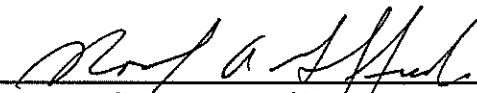
McCoy and Associates, Inc.

May 16, 17, 18, 19 & 20, 2005

Hilton Head, South Carolina



Signature of Instructor



Signature of Instructor



CONESTOGA-ROVERS & ASSOCIATES

Certifies that

Peter Remzick

has successfully completed the requisite training requirements for

DOT - Hazardous Materials Transportation

In accordance with DOT 49 CFR 172.704 and in evidence thereof is awarded this

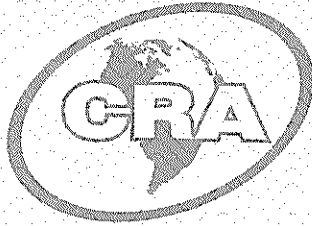
Certificate of Completion

on this 26th day of February, 2003

Christopher B. Andrews

Christopher B. Andrews, CET
Manager, Health and Safety Training

CRA Course # EHS - 019
Certificate Number 02.0001



CONESTOGA-ROVERS & ASSOCIATES

Certifies that

Corrie Bondy

has successfully completed the requisite training requirements for

*Hazardous Materials Transportation
including RCRA Waste Manifesting*

In accordance with DOT 49 CFR 172.704 & RCRA 40 CFR part 262/263
and in evidence thereof is awarded this

Certificate of Completion

on this 9th day of March, 2005

Christopher B. Andrews

Christopher B. Andrews, CET
Manager, Health and Safety Training

CRA Course # EHS - 018/019
Certificate Number 00.00.05-006



CONESTOGA-ROVERS & ASSOCIATES

Certifies that

James VanAssche

has successfully completed the requisite training requirements for the
Hazardous Materials Transportation
including RCRA Waste Manifesting

In accordance with DOT 49 CFR 172.704 & RCRA 40 CFR Part 262/263
in evidence thereof is awarded this

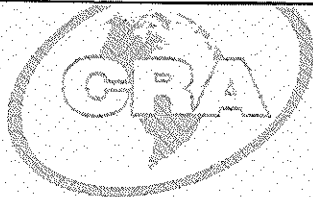
Certificate of Completion

on this 3rd-4th day of May, 2007

Christopher B. Andrews

Christopher B. Andrews, CET
Manager, Health and Safety Training

CRA Course # EHS-018/019
Certificate Number 05.03-04.07 - 11
Detroit



CONESTOGA-ROVERS & ASSOCIATES

Certifies that

Luis Alvarez

has successfully completed the requisite training requirements and test for

***Hazardous Materials Transportation
including RCRA Waste Manifesting***

In accordance with DOT 49 CFR 172.704 & RCRA 40 CFR part 262/263
and in evidence thereof is awarded this

Certificate of Completion

on this 31st day of August, 2006

Christopher B. Andrews

Conestoga-Rovers & Associates
2055 Niagara Falls Blvd
Niagara Falls, NY 14304

*Christopher B. Andrews, CET
Manager, Health and Safety Training*

CRA Course # EHS - 018/019
Certificate Number 06-002