



October 1, 2007

U.S. EPA Region 5
Waste Pesticides and Toxics Division, DE-9J
77 West Jackson Blvd.
Chicago, IL 60604-3590
Attn: Ms. Mirtha Capiro

RE: General Motors Corporation - Moraine, Ohio
Revised Supplemental Groundwater Investigation Work Plan, No. 2

Dear Ms. Capiro:

On behalf of General Motors Corporation (GM), BOW Environmental Solutions, Inc. is submitting the second Revised Supplemental Groundwater Investigation Work Plan for the Former Delphi Harrison Thermal Systems, General Motors Truck Group Moraine Assembly Plant, and the former General Motors Powertrain Group Moraine Engine Plant in Moraine, Ohio. As detailed below, the purpose of this Work Plan is to gather additional data to support further evaluation of ongoing corrective measures.

GM is proposing additional work in two areas: one area is on the west side of the Great Miami River and the other area is east of Dryden Road, south of the GM Facility, near existing upper aquifer well GM-62. This proposed work will be implemented following completion of the work described in the Revised Supplemental Groundwater Investigation Work Plan dated June 25, 2007. After completion of this proposed work and the work described in the June 25, 2007 Work Plan, GM will provide U.S. EPA with a report of these supplemental investigation results. This report will include an evaluation of the 2007 supplemental investigation results with respect to the scope of ongoing corrective measures, and propose changes to these corrective measures, if warranted to meet the corrective action objectives.

The objectives for the proposed work scope presented below are to:

- Refine current understanding of the hydrogeology and provide additional characterization of groundwater chemistry west of the Great Miami River and downgradient of existing well pairs GM-48/GM-51 and GM-49/GM-52. This will be accomplished by profiling the upper aquifer lithology and VOC concentrations in groundwater, and installation of monitoring wells at these locations; and
- Refine current understanding of the hydrogeology and provide additional characterization of groundwater chemistry east of upper aquifer well GM-62 by profiling the upper aquifer lithology and VOC concentrations in groundwater, and installation of a monitoring well east of this location.

Proposed Scope of Work

Additional characterization of hydrogeology and groundwater chemistry to the west of the Great Miami River and east of Dryden Road in the vicinity of GM-62 will be conducted. GM will evaluate one area for installation of proposed well GM-78 and two areas for installation of proposed wells GM-79 to GM-80 (Figure 1). The boring locations are approximate and may be modified based on utility clearance, site access, and permits. The borings will be drilled using rotosonic methodology and continuously sampled for lithologic characterization. During drilling, vertical aquifer sampling will be conducted to provide an understanding of the volatile organic compounds (VOC) concentration profile. This data will be considered as screening quality and will be used to determine whether to install wells as discussed below.

- Well GM-78 will be located east of Dryden Road, south of the GM Facility, and east of GM-62 to further refine the current understanding of the hydrogeology and groundwater chemistry in the upper aquifer sidegradient to GM-62. Proposed well GM-78 will be drilled to a minimum depth of 70 feet below land surface (ft bls) or to the depth of the regional clay till, if encountered. Vertical aquifer profiling for the upper aquifer will be conducted during drilling (approximately every 10-15 ft once the water table is reached). The groundwater samples will be submitted for expedited laboratory analysis of the site-specific VOC parameter list. Upon evaluation of the groundwater profiling data, a shallow and/or deep upper aquifer well may be installed. Authorization to drill at this off-site location will be obtained by GM prior to drilling.
- Wells GM-79 and GM-80 will be located west of the Great Miami River to further refine the current understanding of the hydrogeology and groundwater chemistry downgradient of well pairs GM-48/GM-51 and GM-49/GM-52. Proposed wells GM-79 and GM-80 will be located west of the levee wall and drilled to a minimum depth of 70 ft bls, or to the depth of the regional clay till, if encountered. Vertical aquifer profiling for the upper aquifer will be conducted during drilling (approximately every 10-15 ft once the water table is reached). The groundwater samples will be submitted for expedited laboratory analysis of the site-specific VOC parameter list. Upon evaluation of the groundwater profiling data, shallow and/or deep upper aquifer wells may be installed. Authorization to drill at these off-site locations will be obtained by GM prior to drilling.

The newly installed wells will be developed and surveyed following procedures defined in the Supplemental RFI Work Plan (ARCADIS 1997). The new wells will be sampled following procedures defined in the Site-Wide Groundwater Monitoring Plan (ARCADIS 2002). The groundwater samples will be submitted for laboratory analysis of the site-specific VOC parameter list. Following completion of well installation, a site-wide round of water level measurements will be conducted. GM will work with the City of Moraine to obtain access to at least four existing monitoring wells located within Miami Shores (north and west of proposed wells GM-79/GM-80) to collect depth to water measurements during the site-wide event.

Data Report

The data generated from the 2007 supplemental investigation activities will be used to evaluate hydrogeology and groundwater chemistry in the vicinity of the Great Miami River, Holes Creek, south of RZ-1, and in the general area around GM-41/GM-68 to better assess the current corrective measures. The data report may include a recommendation to add some of these new wells to the site-wide groundwater monitoring program. The data evaluation will include the results of the transducer study, boring logs, groundwater contour maps, tabulated analytical results, geologic cross sections, and analytical results posted in databoxes on figures. In addition, GM will utilize these data to provide an updated assessment of corrective measures performance. Based on this assessment, GM will propose modifications, if warranted, to the ongoing corrective measures to optimize the overall performance and duration of the final corrective measures.

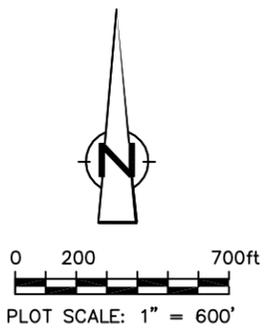
GM will proceed with the field work portion of this proposed Work Plan when permits and utility clearances are finalized. The drilling is scheduled to begin the week of October 8, 2007. Please call 937-455-2636, if you have any questions.

Sincerely,



Pamela L. Barnett, PG
Project Manager
BOW Environmental Solutions, Inc. on behalf of GM

cc: H. O'Connell, Ohio EPA
J. Caufield, GM Remediation



LEGEND	
	PROPOSED MONITORING WELL
	MONITORING WELL (SHALLOW)
	MONITORING WELL (DEEP)
	RECOVERY WELL
	PUMP TO WASTE WELL
	FIRE WELLS
	STREAM GAUGE
	MIAMI SHORES WELL FIELD (APPROXIMATE LOCATION)

**PROPOSED MONITORING WELL LOCATIONS
GENERAL MOTORS CORPORATION
MORAIN, OHIO**

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DATE 8/15/2007	PROJECT MANAGER N. GILLOTTI	DRAWING NAME CRA/07/OH29407-10
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