

From: James Innes
To: DEQ-NLP.DEQ-BayCity.MATLOCKS
Date: Thu, Nov 20, 1997 3:50 pm
Subject: Linden Rd Landfill -Reply

Thank you for your inquires into the status of the RAP for the Linden Road Landfill site in Genesee County. Sorry it has taken so long to get back to you (from your first note), but the file material is quite extensive.

Let me start with your last question first:

Woodblocks: No VOCs, SVOCs, or metals were detected in TCLP extracts from samples of the woodblocks. Aroclor-1254 was detected in three of the five samples at values ranging from 4.9 mg/kg to 13 mg/kg. GM has proposed the placement of geofabric over the woodblocks before the soil cover is constructed. This should keep the blocks from frost heaving.

RAP Approval: The RAP was submitted and reviewed prior to the creation of FOQRT. The initial RAP was found incomplete and after some discussion GM submitted an Addendum to the RAP to address these shortcomings. GM is under the correct assumption that we intend to approve the RAP, in its modified form. We are currently reviewing the draft restrictive covenant and O&M plan.

O&M and the AYSO: The draft O&M plan states "O&M activities will be conducted by General Motors Corporation (GMC) or a designated representative under the direct supervision of GM." It is GM's responsibility to perform O&M.

Groundwater Sampling: The frequency, parameters, and goal of the Groundwater Monitoring Plan have not been finalized. This information will be included in the final draft of the O&M plan and added to the RAP. We have agreed with the consultant's assertion that the shallow water bearing unit is not an aquifer. We have no evidence that contaminated groundwater is leaving the site or discharging into off-site surface water.

Composite Samples: Both discrete and composite soil sampling was done during the site investigation. Composites were taken to better determine overall site conditions whereas discrete samples were taken in an attempt to identify individual sources of contamination. Verification sampling was not performed following the interim remedial measures removal action. Contamination remaining after the limited removal was considered to be similar to the rest of the landfill and therefore could be addressed in the site wide remedial action.

Eco Study: The Site Investigation included a Ecological Risk Assessment. The concern over burrowing animals with a limited habitat range was describing current (no action) conditions. A well maintained soil cover will limit the contact of these animals with contaminated soil. This risk assessment also concluded the potential discharge of groundwater to surface water is not expected to pose a threat to aquatic life.

Deeper Soils/Lower Water Bearing Unit: No contamination was found in the deeper soils of the site. The results of water samples from the lower water bearing unit have been inconsistent. Every compound detected has been below Generic Residential except Pb. In one sampling round, Pb was detected at 8.2 ppb in one well and was present at levels below 4 ppb in the other two. However, the field blank from this sampling event also contained 2.8 ppb of Pb.

Local Background: Due to the fact GM tried to target (through geophysical tests) the locations of their subsurface investigation, all soil samples were considered impacted. Also, during soil sampling, if the sampling personnel had reason to believe a particular interval was more seriously impacted (ie visual, PID screening, etc) a discrete sample of this interval was obtained. As such, the average concentration of a particular compound is obviously skewed to the high side. They have not determined local background values for either soils or groundwater.

I hope this answers the bulk of your questions. I am available should you require further information.

CC: DEQ-NLP.DEQ-BayCity.BROULLB, DEQ-ERD.SCHULTZD, MO...