

Kaiding, Derek

From: Rudloff, Gregory <rudloff.gregory@epa.gov>
Sent: Wednesday, November 06, 2013 3:51 PM
To: Kaiding, Derek
Cc: Grant Trigger; Dave Favero; Olsberg, Colleen
Subject: RE: EPA Comments on RFI Report for Former GMPT - Livonia Project

The U.S. EPA has completed a review of the CA750 Current Human Exposures Under Control document dated August 2, 2013. Below are EPA's comments:

1. A revised version of Figure 7 from the RFI Report needs to be included. A hard copy of Figure 7 needs to be provided to EPA for attaching to the CA750 form that shows all the numbers clearly, distinguishes between filtered and unfiltered samples (since one of the arguments by the RACER is that arsenic and lead are linked to sediments in groundwater), and that gives a better idea of where screening levels came from (if they are from Part 201, RACER need to specify).

Please provide the information requested above to EPA. Feel free to contact me if you have any questions.

Gregory A. Rudloff, P.G.
Corrective Action Section 1
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From: Kaiding, Derek [<mailto:DKaiding@haleyaldrich.com>]
Sent: Friday, July 26, 2013 12:49 PM
To: Rudloff, Gregory
Cc: Grant Trigger; Dave Favero
Subject: RE: EPA Comments on RFI Report for Former GMPT - Livonia Project

Sure –

Here they are.

Derek

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From: Rudloff, Gregory [<mailto:rudloff.gregory@epa.gov>]
Sent: Friday, July 26, 2013 1:15 PM
To: Kaiding, Derek
Cc: Grant Trigger; Dave Favero
Subject: RE: EPA Comments on RFI Report for Former GMPT - Livonia Project

Could I get the EI725 and EI750 documents in word format. I need to make a few minor revisions.

Thanks,

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From: Kaiding, Derek [<mailto:DKaiding@haleyaldrich.com>]
Sent: Monday, June 17, 2013 12:26 PM
To: Rudloff, Gregory
Cc: Grant Trigger; Dave Favero
Subject: RE: EPA Comments on RFI Report for Former GMPT - Livonia Project

Hi Greg,

On behalf of RACER Trust, attached please find a draft version of the revised RFI Report, with edits to the text (track changes used) that incorporate information to address USEPA's comments noted below. If you find these edits acceptable for addressing your comments, we will finalize and distribute the revised report, accordingly. Otherwise, perhaps we could schedule a call to discuss these edits/comments. Let us know, and we will follow up, accordingly.

Regards,

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From: Rudloff, Gregory [<mailto:rudloff.gregory@epa.gov>]
Sent: Tuesday, May 21, 2013 2:15 PM
To: Dave Favero; Grant Trigger
Cc: Kaiding, Derek; Little, Paul
Subject: RE: EPA Comments on RFI Report for Former GMPT - Livonia Project

The U.S. Environmental Protection Agency, Region 5 has completed a review of the document *RCRA Facility Investigation Report, Former GM Powertrain Division Livonia*, dated March 15, 2013. Below are EPA's comments.

2.3 RFI Work Plan Modifications

1. The actual versus planned number of soil samples collected and analyzed to offset the anticipated reduction in groundwater data should be specified.

3.2 Groundwater Use/ Water Supply

2. The distance to the domestic well located downgradient of the Site should be specified.

4. INVESTIGATION RESULTS AND DISCUSSION

3. The results of video recording of the trenches and former process conveyance lines should be discussed here and the data included as an appendix (DVD would be fine).
4. The results of the GPR surveys at AOI-08, AOI -17, and AOI -26 should be discussed here and the data included in an appendix.

4.2.2 Analyte Detections and Criteria Exceedances

5. The arsenic exceedances in soil should be discussed further in this section, including a discussion of background levels.
6. The Michigan Background Soil Survey 2005 values should be referenced for comparison to site data.

Please submit a revised version of the RFI Report to EPA addressing the comments above. Let me know if you need any additional information.

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