

STATE OF MICHIGAN



JOHN ENGLER, Governor

DEPARTMENT OF ENVIRONMENTAL QUALITY

"Better Service for a Better Environment"

HOLLISTER BUILDING, PO BOX 30473, LANSING MI 48909-7973

INTERNET: www.deq.state.mi.us

RUSSELL J. HARDING, Director

REPLY TO:

SHIAWASSEE DISTRICT OFFICE
10650 S BENNETT DR
MORRICE MI 48857-9792

COPY

January 8, 1998

Mr. Robert Metcalf
General Motors Corporation
North American Operations
902 E. Hamilton Ave.
Flint, Michigan 48550-8504

Dear Mr. Metcalf:

SUBJECT: Request for Further Information in Regard to the Remedial Action Plan for the Linden Road Landfill, Genesee County, Michigan

The Michigan Department of Environmental Quality (MDEQ) has completed its review of the following documents submitted by General Motors Corporation (GM) in regard to the Remedial Action Plan (RAP) for the above referenced site. The Draft Declaration of Restrictive Covenant (Parcel #1), the Draft Notice of Approved Environmental Remediation (Parcel #2), and the Draft Operation and Maintenance Plan. As the proposed closures are different, the MDEQ will address the requirements of each Parcel separately.

Parcel #1:

- 1) GM did not submit a Draft Legally Enforceable Agreement for MDEQ review. The Restrictive Covenant is attached to and becomes part of the Final Legally Enforceable Agreement. A model agreement is enclosed to assist GM in developing a Draft for Parcel #1.
- 2) As there are no current Limited Recreational Cleanup Criteria, all references to the closure category for Parcel #1 should be for a Site Specific cleanup, as described in Section 20120(2) of Part 201 of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended.
- 3) All blanks in the Restrictive Covenant should be filled in with the appropriate information, and all text not applicable should be deleted.
- 4) GM did not submit a Financial Assurance Mechanism (FAM). Submission of a FAM is necessary to fulfill the requirements of the Legally Enforceable Agreement.
- 5) GM has not submitted a perimeter groundwater monitoring plan.
- 6) GM has not submitted a plan for placement of permanent markers at the site to describe restricted areas of the site and the nature of any restrictions.

7) Discussion of the soil cover with MDEQ engineers brought to light the possibility of off site migration of methane into neighboring structures. Although the Land/Resource Restrictions of the Restrictive Covenant includes performing a methane survey prior to installation of structures above the soil cover, no provisions for off site migration monitoring or on site landfill gas management have been proposed. The MDEQ requests GM include either a methane monitoring program at the site perimeter, with action levels and a proposed action plan, or alter the cap design to include a landfill gas management system.

Parcel #2:

1) GM needs to specify the type of Commercial land use category closure they are proposing in the Notice of Approved Environmental Remediation (NAER) A description of the land use category should be included as Attachment C. Language should be taken verbatim from Environmental Response Division Operational Memorandum #14.

2) The Commercial land use category should be inserted in all appropriate locations within the NAER.

3) A legal description of the property, including a tax ID Number, is required as Attachment A to the NAER.

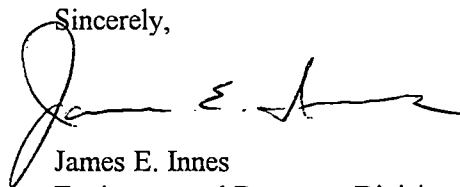
4) A survey of parcel #2 should be included as Attachment B.

5) The paragraph of the NAER that starts with "The Owner also acknowledges that..." should be changed to include the following , "The Owner also acknowledges that the surface and subsurface soils found on the Property must be managed in accordance with the requirements of Section 20120c of the NREPA and other applicable state and federal laws".

6) Also, GM is required to submit documentation that the proposed closure of Parcel #2 conforms with the current zoning of the property.

When the above information is submitted, it will be reviewed and additional comments based on the new information may be sent to you. Feel free to contact me if you have any questions.

Sincerely,



James E. Innes
Environmental Response Division
(517) 625-4693

JEI/jh

Attachment

cc: Mr. Rod Mosier, MDEQ
Mr. Brad Ermisch, MDEQ
✓ Mr. Wayne Morse, MDEQ

01/08/98

Michigan Department of Environmental Quality
Drinking Water and Radiological Protection Division
Drinking Water Quality Monitoring
at Sites of Environmental Contamination
Genesee County

Page

Site Name-Linden Road LF		Project Number- 452223		Site Code- LINDLF
Name	Address	City	Frequency*	Collection Dates/Comments
	5063 CALKINS	FLINT	A	
	5086 CALKINS	FLINT	A	
Total Number of Annual Site Sampling Events		2	Total Projected Annual Site Collection Cost	\$72.0



DEQ District-Shiawassee	ERD District Chief-Mosier	County-Genesee	DWRPD Staff-Rubitschun
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*Q=quarterly T=triannually S=semiannually A=annually B=biennially