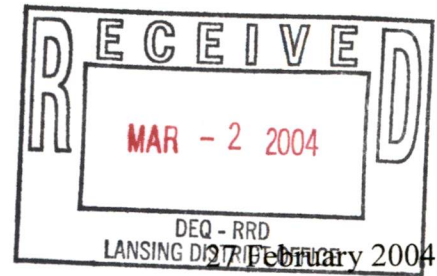




Weston Solutions, Inc.
Suite 500
750 East Bunker Court
Vernon Hills, IL 60061-1450
847-918-4000 • Fax 847-918-4055
www.westonsolutions.com



Mr. James Innes
Michigan Department of Environmental Quality – RRD
P.O. Box 30242
Lansing, MI 48909

Work Order No. 01138.079.010.0010

Re: Plan to Address Potential Migration of Vinyl Chloride in Groundwater
Linden Road Landfill Site (Parcel #3)
Flint Township, Michigan

Dear Mr. Innes:

Weston Solutions, Inc. (WESTON®), on behalf of General Motors (GM) is pleased to submit this plan and scope of work to address an exceedence of vinyl chloride drinking water criteria in groundwater in the vicinity of Monitoring Well MW-3S at the Linden Road Landfill site located in Flint Township, Michigan. This plan is in response to Michigan Department of Environmental Quality's (MDEQ) letter dated 30 January 2004 requesting a course of action in this regard., The following paragraphs include a proposed plan, scope of work, reporting and a schedule for the course of action.

SCOPE OF WORK

Based on the recent investigations conducted to delineate the extent of vinyl chloride in the shallow water-bearing zone in the vicinity and downgradient of MW-3S, ground water samples from two temporary well locations (GP-9 and GP-12) indicated the presence of vinyl chloride. The concentrations of this compound were 0.001 mg/L and 0.003mg/L in GP-9 and GP-12 respectively. While the concentration at GP-9 did not exceed the MDEQ drinking water standards, the concentration of vinyl chloride in GP-12 did exceed the above-referenced standards by 0.001 mg/L. Both these locations are east of MW-03S. Additional temporary wells installed in the area defined the extent of the contamination and showed that the vinyl chloride had not migrated onto the adjacent properties.

WESTON, on behalf of GM proposes to install two monitoring wells (MW-14S and MW-15S) at the two locations where vinyl chloride was detected and monitor the concentrations of this compound in groundwater samples on a quarterly basis for three consecutive quarters beginning





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in March 2004. Monitoring Well MW-03S will also be included in this monitoring. Samples will be analyzed for all the volatile organic compounds from each of the monitoring wells. The locations of the proposed new monitoring wells are shown in (Figure 1).

Monitoring well drilling will be performed using 4.25-inch i.d. hollow-stem augers (HSAs). Soil samples will be collected at continuous intervals with standard split-spoon samplers, using ASTM-1586 procedures. Consistent with the existing wells, well material will consist of a 2-inch diameter, stainless steel, flush-jointed riser pipe and stainless steel (Grade 304) screens. The well screens will be 5 feet in length with 0.010-inch slotted openings. They will be positioned to straddle the water table. All well construction and well development methods will be consistent with those employed in constructing the existing wells.

Groundwater samples will be collected using a peristaltic pump. Attempts will be made to purge approximately three volumes of the water column and measure pH, specific conductance, and temperature prior to sample collection; however, due to the anticipated low permeability conditions of the site soils, this may not be possible.

Sampling equipment will be decontaminated between each use in accordance with standard procedures in the O&M Plan for this site. Where peristaltic tubing is used, a new length will be allocated for each sampling attempt. Quality assurance/quality control (QA/QC) will be evaluated by collection of a field duplicate sample. A trip blank sample will also be analyzed for each shipment of aqueous volatile organic compounds (VOCs) samples to the laboratory. Groundwater samples collected during the investigation will be submitted to Merit Laboratories, Inc. of East Lansing, Michigan. Laboratory analysis will consist of VOCs only. A WESTON chemist, in accordance with standard U.S. EPA protocol, will validate laboratory data.

REPORT PREPARATION

Following completion of the installation and development of the new monitoring wells, the first round of sampling will be conducted. Monitoring well construction diagrams and the results of the first round of sampling will be submitted in a letter report to the MDEQ. Results of the subsequent rounds will also be submitted to the MDEQ on a quarterly basis. At the end of three quarters of sampling WESTON will submit an evaluation of the results of all the three rounds and recommend any additional courses of action if necessary and as appropriate.



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SCHEDULE

The monitoring well installation and the first round of sampling will be conducted during the last week of March 2004. Subsequent sampling will occur in June and September 2004. Reports presenting the results will be submitted to the MDEQ within one month of completing sampling activities during every quarter. WESTON will notify MDEQ at least one week prior to the start of sampling on a quarterly basis.

If you have any questions or require additional information, please call me at (847) 918-4018.

Very truly yours,

Weston Solutions, Inc.

A handwritten signature in black ink, appearing to read "S. Babusukumar", with a horizontal line extending to the right.

S. Babusukumar, P.G.
Project Manager

SB\tg

Cc: R. Metcalf, GM

