



Mark Parkinson, Governor
Roderick L. Bremby, Secretary

DEPARTMENT OF HEALTH
AND ENVIRONMENT

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Division of Environment

March 9, 2010

David Favero
Favero Geosciences
1210 South 5th Street
Springfield, IL 62703

**Re: Comments, Voluntary Cleanup Investigation (VCI) Report for TMW-130 Area,
Former General Motors Fairfax I Plant Site, Kansas City, Kansas**

Dear Mr. Favero:

The Kansas Department of Health and Environment (KDHE) has completed its review of the document titled, "Results of Soil and Groundwater Characterization investigation TMW-130 Area". The VCI Report was prepared by Conestoga-Rovers & Associates (CRA) and submitted to KDHE on February 23, 2010, on behalf of Motors Liquidation Company (MLC). Preparation and submittal of the VCI Report were in response to requirements contained in the Voluntary Cleanup and Property Redevelopment Program Agreement No. 01VCP0010, which was executed on March 14, 2001.

KDHE's review of this document was based on results meeting the investigation objectives presented in the Scope of Work for Class IV Contamination that accompanied the above referenced Voluntary Agreement. Based on KDHE's review of the VCI Report, the following comments were generated.

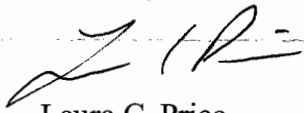
1. **Analytical Results.** The laboratory data sheets identified total petroleum hydrocarbons – gasoline range organics (TPH-GRO) for sample locations SB-F4-A (76 mg/kg) and SB-D4-A (78 mg/kg); yet, these results were not included on Table 5.1 or Figure 5.2. KDHE recognizes that these results were "B" coded due to TPH-GRO (2 mg/kg) being detected in the method blank. However, this detection does not make the results invalid. Please update Table 5.1 and Figure 5.2 to include the TPH-GRO detections.
2. **Page 9, Section 5.1.1.** Please include language specifying that TPH-GRO was detected at sample locations SB-D4-A and SB-F4-A.
3. **Page 12, Section 6.0.** Please state that TPH-GRO was detected in shallow soils at sample location SB-D4-A.

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- 4. Page 13, Section 6.0.** Based on KDHE's review of the site, there are still areas (S-8, MW-103A/SB-110, and TMW 127) that need additional investigative work prior to remedial activities commencing.

The comments presented above must be addressed before KDHE can approve the VCI Report. This can be accomplished by submitting a revised VCI Report. A revised VCI Report should be prepared and submitted to KDHE by April 9, 2010. If you have any questions or comments regarding the project, please contact me by email at lprice@kdheks.gov or by telephone at 785-296-5531.

Sincerely,



Laura C. Price
Environmental Scientist
Remedial Section/Voluntary Cleanup Unit
Bureau of Environmental Remediation

LCP

C: Jerry Lineback > Laura Price > Former GM Fairfax 1 Plant (105-00021, 1.0)
Phil Harvey, Conestoga-Rovers