

From: Sue Kaelber-Matlock
To: DEQ-SC.DEQ-Shiawassee.INNESJ
Date: Tue, Nov 4, 1997 2:38 pm
Subject: GM Linden Rd

Hi, as you know I live next to the GM Linden Road dump site. I also oversee RI/RAP implementation for the GM sites in the Saginaw Bay District so I'm also concerned about consistency within the Dept, since GM is always so concerned about our consistency. I had the opportunity to look at (in one hour) the 1/96 draft RAP with some appended RI stuff for this site last night at the AYSO Soccer Awards ceremony. Bob Metcalfe and Dan Dolan from GM were there with sketches to announce the opening of the Delphi Soccer Park in spring of 1999 on the landfill site. I understand that there is a later draft of the RAP and I did not have the IR or RI reports, so some or all of my questions may have been answered, but since my son will be playing soccer on this field, you can understand why I'm going to ask the questions anyway. I do think that this project is worthwhile and I'd like to see it go.

Do we have a final RAP that has gone through Lansing or is GM still working from a draft that hasn't been finalled. They are publicly announcing a new soccer complex and hauling in dirt for fields. GM obviously believes that their RI and RAP are adequate and will be approved.

The appended RI sections of the RAP indicate that 4 acres of GM wood blocks, with composite sampling indicating PCBs <50ppm, will be left in place under the cap. In other GM sites where I have worked with wood blocks, GM corporate environmental staff have told me that wood blocks will always eventually frost heave to the top of the ground. Since wood blocks are an easily visible discrete source, we have asked and GM has agreed to undertake actions to remove and dispose of all the wood blocks at a similar GM site in Bay City where a cap over contaminated soil will be used to make a public park. Why is GM leaving blocks on this site?

The O&M and monitoring sections were very vague, but I understand from talking with Metcalfe that the soccer organization is going to do the inspections on the cap and give GM a report. AYSO is a completely volunteer organization with little continuity in staffing from year to year. In working with and talking to current AYSO staff, no one knew exactly what was going to be under the cap, what a wood block looked like, or understood what significance an erosion gully would have except that it would make it more difficult to play soccer. I'm not sure the expertise is available through the soccer organization to monitor a landfill cap. Metcalfe assured me that GM was going to be responsible, but if GM personnel aren't there, I don't think they will ever find out if there's a problem. The RAP indicated that the O&M would be a stand alone document, have they submitted one?

The O&M section of the RAP indicated that the shallow groundwater would be monitored until 2 consecutive events indicated levels below the criteria for groundwater not in an aquifer. They didn't specify what criteria, are they talking about GCC or GSI?

The RAP indicates that the shallow groundwater is not groundwater in an aquifer. Have we agreed with that yet?

As I understand the surface drainage in the area, the shallow groundwater probably discharges to a stream north of the site. I didn't see where they evaluated GSI or GCC. I didn't have the analytical, so maybe these aren't a problem, but I didn't see them in the RAP. GM indicates that only direct contact with soils and groundwater ingestion are potential pathways.

The RAP discussed composite samples in several areas, I didn't have the analytical, so maybe discrete sampling was done, but GM appeared to be making decisions on composite samples?

When GM did the soil removals as part of the interim response measures, such as in the Oil Disposal Area, was verification sampling done? For PCBs?

In the RAP, GM indicated that, with the stuff left onsite, they expected an adverse impact to terrestrial mammals with a limited home range, is this acceptable? They also indicated that they assumed no impact to aquatic organisms, did they do an eco study?

Was there contamination in the deeper soils or aquifer? The text appeared contradictory, no impact and impact, but not significant because of potential cross contamination, however the RAP didn't indicate how the cross contamination was verified.

With an average concentration of 420 ppm Pb in the soils, how do they know the elevated levels of Pb in the lower aquifer are not due to the site? Did they do local background for groundwater? Their metals numbers in soils also

appear high, did they do soils backgrounds?

These are the questions I came up in the short time that I had to look at the RAP, but I'd like to understand the site better since my kids will be playing there and since I am reviewing similar GM sites. Maybe I could come down some afternoon and look at the RI and IR reports? Thanks, Sue

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