



August 26, 2014

Mr. Peter Ramanauskas
U.S. Environmental Protection Agency, Region 5
77 West Jackson Boulevard LU-9J
Chicago, Illinois 60604-3507

Subject: Application for Coordinated Approval in Accordance with 40 CFR §761.77(c)
Risk-Based Polychlorinated Biphenyl (PCB) Cleanup Plan
Former General Motors (GM) Grand Rapids Metal Plant Property
300 36th Street SW, Wyoming, Kent County, Michigan

Dear Mr. Ramanauskas:

Revitalizing Auto Communities Environmental Response (RACER) Trust, after consultation with the Michigan Department of Environmental Quality (MDEQ), is requesting Toxic Substances Control Act of 1976 Coordinated Approval for the enclosed Risk-Based PCB Cleanup Plan in accordance with the requirements of Title 40 of the Code of Federal Regulations (CFR) §761.77(c) for the Former Grand Rapids Metal Plant property with polychlorinated biphenyls (PCBs) contaminated environmental media.

In accordance with 40 CFR §761.77(a), we are submitting the following information:

- The Risk-Based PCB Cleanup Plan, which includes previous relevant Michigan Act 451, Part 201 (Part 201) facility (Part 201 Site List Identification No. 41000115) site investigation information.

The Risk-Based PCB Cleanup Plan has been prepared in accordance with the procedures set forth in 40 CFR 761.61(c) as an application to the United States Environmental Protection Agency (U.S. EPA) to implement a cleanup of Site-related PCB contamination under the risk-based cleanup option and includes applicable aspects of the self-implementation alternative described in 40 CFR 761.61(a). The

Risk-Based PCB Cleanup Plan addresses PCB impacts in the former Tar House Area and the Bulk Unload Area. The PCB impacted soils are apparently residuals from historic operations at the Site. RACER has been working with Ms. Darlene Stringer, MDEQ Project Manager (616.356.0023) in evaluating several remedial strategies for the Site.

RACER is currently completing voluntary investigation and cleanup at the Site pursuant to MDEQ oversight under Part 201. RACER Trust's Site Identification No. is MIK156633412. Additionally, Site Identification No. MID006020408 is associated with the Site; however, this Site Identification No. is associated with the current property owner, the City of Wyoming Brownfield Redevelopment Authority (WBRA).

This interim measure addresses source removal at two areas at the Site and will be completed as a portion of the overall Part 201 remedial activities to be completed at the Site. There are several other areas that will be addressed under Part 201 at the Site by additional corrective measures and/or deed restrictions.

RACER and the WBRA are aware of and will adhere to the TSCA PCB reporting and recordkeeping requirements described in Subparts J and K of 40 CFR 761.

Note that RACER was established and assumed the rights, title, and interest of Motors Liquidation Company pursuant to an Environmental Response Trust Consent Decree and Settlement Agreement ("Settlement Agreement") entered by the U.S. Bankruptcy Court for the Southern District of New York on March 29, 2011, in the case of *In re Motors Liquidation Company, et. et al, Debtors*, Case No. 09-50026 (REG), among the Debtors, the United States of America, certain states including the State of Michigan, the Saint Regis Mohawk Tribe, and EPLET, LLC, (not individually but solely in its representative capacity as Administrative Trustee of the Trust).

RACER appreciates the guidance and assistance provided by the Region 5 TSCA Program. We look forward to receiving written U.S. EPA approval of our application after the MDEQ issues a recommendation for coordinated approval of the Work Plan. If you have any questions or need additional information to provide the approval, please contact me at dfavero@racertrust.org or 734.879.9525, or Jeni Quigley with Conestoga-Rovers & Associates (CRA) at jquigley@croworld.com or 269.685.5181.

Sincerely,



David Favero
Deputy Cleanup Manager, Michigan

Enclosure: Risk-Based PCB Cleanup Plan, Former Grand Rapids Metal Plant, 300
36th Street, Wyoming, Michigan

cc: Joe Cisneros, U. S. Environmental Protection Agency, Region 5
Jean Greensley, U. S. Environmental Protection Agency, Region 5
Darlene Stringer, MDEQ, RRD
Deborah MacKenzie-Taylor, MDEQ, OWMRP