



October 10, 2009

U.S.EPA Region II
Emergency & Remedial Response Division
290 Broadway, 19th Floor
New York, NY 10007-1866
Attn: Ms. Anne Kelly

RE: Former Central Foundry – Massena Superfund Site, Massena, New York
EPA Orders Index No. II CERCLA-20207 and 20215 -
Monthly Progress Report No. 209 for September 2009

Dear Ms. Kelly:

On behalf of Motors Liquidation Company (MLC), BOW Environmental Solutions, Inc., enclosed please find 2 copies of the Monthly Progress Report relating to the activities performed during the month of September 2009, in conformance with the Unilateral Administrative Orders for both operable units of the Former Central Foundry, Massena Superfund Site.

Should you or your staff have any questions regarding the contents of the Progress Report, please contact me at (937) 478-8221.

Sincerely,

A handwritten signature in black ink that reads "Pamela L. Barnett". The signature is fluid and cursive.

Pamela L. Barnett, PG
Project Manager
BOW Environmental Solutions, Inc. on behalf of MLC

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Former Central Foundry Massena Superfund Site - Operable Units 1 & 2
USEPA Unilateral Administrative Orders Nos. II CERCLA - 20207 & 20215

I. Compliance Activities Completed for the Period (September 1 through September 30, 2009)

Site Wide

On Thursday, September 24, 2009, MLC and ARCADIS met with US EPA at their headquarters in New York City to continue discussions concerning EPA's August 20, 2009 letter to MLC and MLC's strategy to complete the remediation work at the site. In a letter dated October 1, 2009, MLC provided EPA with a formal response to the August 20, 2009 letter and provided a status update on mutually agreed upon deliverables by October 9, 2009. Those deliverables will include the following items:

- Draft white paper outlining a hybrid remedial strategy to address remaining units at the site.
- Work Plan for delineation of remaining off-site soils.
- Overall Site Schedule for remaining deliverables.

St. Lawrence River

On September 9, 2009, ARCADIS performed the 2009 annual Inspection of the St. Lawrence River Sediment Cap (adjacent to GM). The cap inspection was conducted along the shoreline of the St. Lawrence River in shallow water. The general integrity of the stone cap inspected was found to be undisturbed and in good condition. No areas of the stone cap were found to have deficient cap stone covering. A formal report on the cap inspection will be submitted to US EPA in January, 2010. The next cap inspection will be conducted in 2010.

East Disposal Area

During the week of September 14, 2009, preliminary soil laboratory analytical results from the *Soil Investigation Work Plan - East Disposal Area Infield* (conducted during the week of August 24-28, 2009) were received from the laboratory. On September 22, 2009, ARCADIS submitted (via email) the preliminary laboratory analytical results to US EPA and the SRMT Environmental Division. Based on these preliminary results, the laboratory was instructed to run PCB analysis for 6 additional contingency samples. On October 1, 2009, ARCADIS submitted (via email) the preliminary laboratory results for these 6 contingency samples to US EPA and the SRMT Environmental Division. Based on the analytical results of the additional contingency samples, ARCADIS asked US EPA for permission to finalize the data package. Upon receipt of the full data package, validation of the data will then be completed which will be followed by preparation of an East Disposal Area Infield Investigation Completion Report.

Groundwater Controls

On June 10, 2009, the revised *Interim Groundwater Characterization Sampling and Analysis Report* was submitted to USEPA along with responses to EPA's May 14, 2009 comments. On

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September 9, 2009, GM collected quarterly groundwater samples from the sump northeast of the Industrial Landfill. Analytical results for the water samples are provided in Attachment 1.

On September 25, 2006, the draft *Quality Assurance Project Plan (QAPP)* was submitted to USEPA for approval. MLC is awaiting approval from USEPA of this plan.

Mohawk Uplands Soils

The *Mohawk Upland Area Remedial Action Completion Report* was submitted to USEPA on February 6, 2008. MLC is awaiting approval from USEPA of this completion report.

Access to the one remaining property of concern on the St. Regis Mohawk Tribal Reservation (the north parcel) continues to be restricted by the property owner.

Cove Project

On September 9, 2009, GM collected a semiannual water sample from the Turtle Creek Holding pond on the SRMT property. The analytical result for this water sample is provided in Attachment 1.

On April 24, 2006, the revised draft *Cove Remedial Action Completion Report* was submitted to USEPA for approval. MLC is awaiting USEPA's approval of this completion report.

Facility Activities

On October 1, 2009, MLC filed a Report of Noncompliance Event with the NYSDEC Division of Water. A pH reading of 9.3 was measured at the 003 Storm Water Outfall on September 27, 2009. The permit range is 6.0 – 9.0 for pH. The pH suspected to be out of range due to the close proximity of sample location to the location of the tubing from the chemical disinfection pump. The preventive corrective action was changing the tubing location for the chemical disinfection pump further away from the sample collection point.

Maintenance Activities

On September 9, 2009, GM collected a quarterly sump water samples from the underdrain beneath GM Process Water Lagoon #2 (former 350,000 gallon lagoon). Analytical results for the water samples are provided in Attachment 1.

Outfall 004 (north of the Industrial Landfill) and Outfall 002 (at the Raquette River) were both sampled on September 15, 2009. The analytical results for these water samples are provided in Attachment 1.

Also during the month of September, a total of approximately 57,540 gallons of water (approximately 3,680 gallons from the sump northeast of the Industrial Landfill, 8,360 gallons from the containment cell areas, and 45,500 gallons from the Process Water lagoon underdrain) were transferred to the site's WWTS for treatment.

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II. Analytical Data

Analytical results received during the month of August for the Massena Superfund Site include the following:

- Table 1 – Summary of Outfall 002 Water Sampling Analytical Results.
- Table 2 – Summary of Outfall 004 Water Sampling Analytical Results.
- Table 3 – Summary of Quarterly Water Samples NE Industrial Landfill Groundwater Sump
- Table 4 - Groundwater Sump Process Water Lagoon #2 Water Analytical Results.
- Table 5 – Turtle Creek Holding Pond Semi-Annual Water Sample PCB Analytical Results.

Results are provided in the tables in Attachment 1.

III. Project Tasks Scheduled for the Coming Month (October 2009)

MLC is preparing to submit a draft white paper outlining a remedial strategy for completing the remediation at the site, a Work Plan for the delineation and investigation of remaining soils located on the St. Regis Mohawk properties, and an overall site schedule for remaining deliverables, MLC also anticipates receiving approval from USEPA on the Quality Assurance Project Plan, and the Site Inspection, Monitoring, and Maintenance Plan, the Cove Remedial Action Completion Report, and the Mohawk Upland Area Remedial Action Completion Report.

IV. Project Status, Delays and Recovery Plans

In order to provide better visibility of submittals under review, the following table summarizes submittals made during the month, submittals responded to during the month, and submittals which continue to be under review.

<u>Submitted to EPA / NYSDEC</u>	Date
MLC letter to EPA – Response to August 20, 2009 letter and September 24, 2009 Meeting	October 1, 2009
MLC letter to NYSDEC Division of Water – Report of Noncompliance Event	October 1, 2009
<u>Previously Submitted to EPA – Pending Comment or Approval</u>	
Industrial Landfill Final Design Report, Vols. I & II	April 27, 2001
Draft Cove Remedial Action Completion Report	April 24, 2006
Draft Quality Assurance Project Plan	September 25, 2006
Draft GM Site Inspection, Monitoring, and Maintenance Plan	January 26, 2007
Mohawk Upland Area Remedial Action Completion Report	February 6, 2008
Results of 2008 Fish Collection Activities to Evaluate Fish Consumption	December 19, 2008

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Advisory in Remediated Cove, St. Lawrence River	
St. Lawrence River Monitoring & Maintenance Annual Inspection Report	February 2, 2009
GM Response to USEPA Request for Information Letter	March 26, 2009
Revised Interim Groundwater Characterization Sampling And Analysis Report	June 10, 2009
GM Letter Report, <i>Summary of Purpose, Scope, Methods, and Results of Building Material Sampling, GM Massena Metal Castings Plant, February – April 2009</i>	July 9, 2009

Comments/Approvals Received from EPA/NYSDEC during the Month

- None -	-
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ATTACHMENT 1

Analytical Data

Massena Remediation Program Report Distribution List

1 copy (excluding plans or reports):

Chief, New York/Caribbean Superfund Branch
Office of Regional Counsel
U.S. Environmental Protection Agency, Region II
290 Broadway, 20th Floor
New York, New York 10007-1866
Attention: GM/Massena Superfund Site Attorney

2 copies (or 5 copies if plan or report):

Emergency and Remedial Response Division
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290 Broadway, 20th Floor
New York, New York 10007-1866
Attention: Anne Kelly

2 copies (or 3 if plan or report):

Mr. Ken Jock
Environmental Director
St. Regis Mohawk Tribe
412 State Route 37
Akwesasne, NY 13655

for Federal Express Packages:
SRMT Environmental Division
449 Frogtown Road
Akwesasne, NY 13655

3 copies (or 3 copies if plan or report):

New York State Department of Environmental Conservation
317 Washington Street
Watertown, New York 13601-3787
Attention: Regional Hazardous Waste Engineer – Peter Taylor, P.E.
Peter S. Ouder Kirk, P.E. (1 copy)
Lincoln Fancher, Project Geologist (1 copy)

1 copy:

Wendy S. Keuhner, P.E.
New York State Department of Health
Flanigan Square, Room 300
547 River Street
Troy, New York 12180

1 copy:

Jim Harrington
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Bureau of Watershed Compliance Programs
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Massena Remediation Program Report Distribution List

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