



JENNIFER M. GRANHOLM
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
JACKSON DISTRICT OFFICE



STEVEN E. CHESTER
DIRECTOR

September 1, 2004

Mr. Ken Richards
General Motors Worldwide Facilities Group
1996 Technology Drive
Troy Technology Park South Building A
482-356-319
Troy, Michigan 48083

Dear Mr. Richards:

SUBJECT: Groundwater Not in an Aquifer Evaluation
PAOC 18 Response Activities
Company Vehicle Operations Area, Former Willow Run Assembly Plant,
Washtenaw County

Attached please find a memorandum from our senior geologist, Mr. Leonard Lipinski, regarding your request for a determination of groundwater not in an aquifer at the Former Willow Run Assembly Plant in Washtenaw County. As Mr. Lipinski notes, we concur with your assessment that the shallow water bearing unit at the site would not be considered groundwater in an aquifer. However, as he also notes, the groundwater/surface water interface pathway does appear to be complete, and those criteria should be considered in any future remedial action plan.

In addition, I have had opportunity to review the work plan for *PAOC 18 Response Activities* dated August 23, 2004. The plan seems appropriate and I look forward to the results. Part 201, Environmental Remediation, of the Natural Resources and Environmental Protection Act, Act 451 of 1994, as amended (Part 201), requires prompt action when free product is discovered at a site, and I am glad to see General Motors being very proactive to undertake these activities at this property.

I appreciate the opportunity to review this information. If you have any questions regarding these comments, please feel free to contact me at 517-780-7932.

Sincerely,

Peter T. Masson
Environmental Quality Analyst
Remediation and Redevelopment Division

Attachment

cc: Mr. R. Dowe Parsons, DEQ
Mr. Leonard Lipinski, DEQ

MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY

INTEROFFICE COMMUNICATION

August 30, 2004

TO: Peter Masson, Project Manager
Remediation and Redevelopment Division
Jackson District

FROM: Leonard Lipinski, Senior Geologist
Remediation and Redevelopment Division
Jackson District

SUBJECT: General Motors Company Vehicle Operations (CVO) Facility
Determination of Groundwater not in an Aquifer

I have reviewed the July 9, 2004 submittal from General Motors requesting a determination that the groundwater in the upper sand unit at the CVO is not in an aquifer as defined in Part 201. Based on the information they submitted and my understanding of the geology, I agree that the groundwater in the upper sand unit is not in an aquifer. However, I think that any groundwater contamination in the upper sand unit has the potential to impact surface water and would be regulated according to the groundwater surface water interface criteria.

