



JENNIFER M. GRANHOLM
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
SAGINAW BAY DISTRICT OFFICE



STEVEN E. CHESTER
DIRECTOR

December 27, 2007

Ms. Cheryl Hiatt
General Motors Corporation
Remediation Services, MC 483-520-190
2000 Centerpoint Parkway
Pontiac, Michigan 48341

Dear Ms. Hiatt:

SUBJECT: REALM Peninsula Area Property
July 24, 2007 Arcadis letter
Selenium

The Department of Environmental Quality (DEQ), Remediation and Redevelopment Division (RRD), has reviewed the July 24, 2007 submittal by Arcadis (BBL) regarding the selenium sampling in the peninsula area. Arcadis' evaluation concluded that selenium is not impacting the wetland or surface waters. The RRD does not agree with this conclusion for the following reasons:

The data indicates the elevated selenium concentrations are moving with the groundwater flow direction from MW-04-121 and MW-144WT in the southeast portion of the peninsula property towards MW97-105 in the center of the peninsula and then towards MW04-124 and the adjacent surface water located just west of the peninsula. Selenium concentrations in MW04-121, MW-144WT, and MW97-105 were above the GSI criteria of 5 ug/l in the three sample events during 2004 and 2006. Sample results from MW04-124WT, adjacent to the wetland, identified selenium above the GSI criteria in both 2004 events but below the criteria in the 2006 event. As the Arcadis submittal indicates, the concentrations of selenium in the wetland's standing water are above the Rule 57 Water Quality Values. Arcadis goes on to say the concentrations in the surface water are several times greater than the concentrations in TW98-109WT, MW98-109SI, MW04-123WT, and MW04-123SI which are the upgradient northern monitor wells. However, when the concentrations in the surface water are compared to the upgradient southeastern wells, the groundwater concentrations are higher indicating that migrating groundwater could be causing the elevated concentrations in the surface water.

Because the selenium exceeds only the GSI criteria, the RRD suggests that a site-specific ecological evaluation, including additional samples of the surface water and wetland sediments, be conducted to determine if these concentrations of selenium are a risk to the environment in this location.

Ms. Cheryl Hiatt

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December 27, 2007

If you have questions, please contact Rhonda Klann, project manager, at 989-686-8025 extension 8302, or me at the number below.

Sincerely,



Brenda J. Brouillet, District Supervisor
Saginaw Bay District Office
Remediation and Redevelopment Division
989-686-8025, Extension 8300

cc: William Willard, Delphi Automotive
Dale Thrush, Delphi Automotive
Kim Bowden, Delphi Automotive
Edward Peterson, GM WFG
Anthony Thrubis, ESQ., GM Legal
✓ Lisa Coffey, Arcadis
Douglas Saigh, MACTEC
Rhonda Klann, DEQ