



September 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. 208 for August 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 August 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, reading "Pamela L. Barnett". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

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

Monthly Progress Report No. 208 – August 2009
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 (August 1 through August 31, 2009)

Site Wide

In a letter dated August 12, 2009, Motors Liquidation Corp. (MLC, formerly General Motors Corporation) notified USEPA of the change in project management for the General Motors Central Foundry Superfund Site (Site) in Massena, New York. In a letter dated August 20, 2009, USEPA responded with a request for submittals of remedial design work plans, sampling plans, design documents and related plans to complete the remaining remediation at the Site. A meeting between USEPA and MLC was held on August 27, 2009 in Washington, D.C. to conduct initial discussions related to the August 20, 2009 letter from USEPA. MLC is currently in the process of preparing for a technical meeting to discuss a realistic schedule for conducting site-wide activities in response to the August 20, 2009 letter.

East Disposal Area

On August 4, 2009, ARCADIS submitted the revised *Soil Investigation Work Plan – East Disposal Area Infield* along with responses to USEPA's comments to USEPA. All of USEPA's suggested modifications to the Work Plan were incorporated into the revised work. On August 19, 2009, USEPA sent an approval letter for the work to begin with the proposed schedule. The objective of the Work Plan was to collect soil core samples at a total of 57 locations to delineate PCBs exceeding the 10 and 500 mg/kg PCB site cleanup goals for the East Disposal Infield.

Preparation work for the investigation began during the week of August 17, 2009, and included bush hogging and mowing of the grass within the EDA Infield area, surveying and staking of Geoprobe core locations with a New York State Certified Surveyor, lay-out (marking) of utility lines in the area, and obtaining all utility clearances so that work could begin on August 24, 2009. No intrusive work was performed during the week.

On Monday, August 24, ARCADIS lead a kick-off meeting for the project attended by the USEPA representative (Dino Zack), the St. Regis Mohawk Tribe (SRMT) environmental representative (Craig Arquette), the Atlantic Testing Laboratories (ATL) Geoprobe crew, Securitas MLC (plant security), MLC facility manager (former GM Corporation manager), and the MLC Project Manager. Items covered during the meeting included work plan objectives, health and safety, utility clearances, PPE, set up of the work zones, sequence of work, communications, and working hours. The Geoprobe rig mobilized to the EDA Infield and began the Geoprobings after the meeting. The Geoprobe work continued through the week and was completed on Friday, August 28, 2009. The USEPA and SRMT representatives were present during the week to observe the work progress. The soil cores varied in depth from 2-feet below grade to 12.8-feet below grade. Core refusal was encountered in a number of core locations which was likely due to encountering glacial boulders/rock common in soil for this area. A total of 206 soil samples were collected on 2-foot composite intervals and sent to Test America (analytical laboratory) during the week. Of the 206 samples collected, 134 were normal soil samples to be analyzed, 36 were soil contingency samples, and 36 were quality control/quality assurance (QA/QC) samples to be analyzed. The laboratory analytical results will be received in 30 days. Full validation of the data will then be completed upon receipt of the analytical results followed by preparation of an East Disposal Area Infield Investigation Completion Report.

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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 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 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.

Maintenance Activities

Outfall 004 (north of the Industrial Landfill) and Outfall 002 (at the Raquette River) were both sampled on August 6, 2009. The analytical results for these water samples are provided in Attachment 1.

Also during the month of August, a total of approximately 71,990 gallons of water (approximately 3,910 gallons from the sump northeast of the Industrial Landfill, 10,280 gallons from the containment cell areas, and 57,800 gallons from the Process Water lagoon underdrain) were transferred to the site's WWTS for treatment.

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.

Results are provided in the tables in Attachment 1.

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

The annual 2009 St. Lawrence River Sediment Cap Inspection will be conducted by ARCADIS. Quarterly water samples will be collected from the sump NE of the Industrial Landfill and from the underdrain at the Process Water Lagoon #2 and a bi-annual water sample will be collected from the Cove Holding Pond. 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>	<u>Date</u>
Revised <i>Soil Investigation Work Plan – East Disposal Area Infield</i>	August 4, 2009
MLC letter to EPA – Notification of Change of Management of GM Massena	August 12, 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 Advisory in Remediated Cove, St. Lawrence River	December 19, 2008
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

<u>Comments/Approvals Received from EPA/NYSDEC during the Month</u>	
Final USEPA approval (with comments) of the <i>Soil Investigation Work Plan – East Disposal Area Infield</i>	August 19, 2009
USEPA letter requesting plans for completing remedial design and remedial action for each Management Unit at the site	August 20, 2009

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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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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. Ouderkirk, 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
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1 copy:

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Massena Remediation Program Report Distribution List

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