



December 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. 211 for November 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 November 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 cursive script that reads "Pamela L. Barnett".

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

Monthly Progress Report No. 211 – November 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 (November 1 through November 30, 2009)

Site Wide

MLC's October 30, 2009 Remediation Cost Estimate Summary for the Massena Site was posted on the IDEA web-site and made available to USEPA and NYSDEC by November 1, 2009. Cost backup tables and a draft Decision Analysis were also posted.

On November 10, 2009, NYSDEC Division of Water visited the site to perform an announced comprehensive Inspection of the wastewater facilities. Visiting onsite from the NYSDEC were Rebecca Storrings, Ann Rice, Steve Botsford, and Peter Ouderkirk. In response to that visit, the NYSDEC sent a Comprehensive Inspection Report dated November 17, 2009. The NYSDEC assigned a satisfactory rating for the November 10, 2009 inspection. The Cover Letter accompanying the November 17, 2009 NYSDEC's Comprehensive Inspection Report also summarized detections and an exceedance of PCBs limits for Aroclor 1242 and 1248 in treatment system effluent sampling analytical results. In addition, the November 17, 2009 NYSDEC's Comprehensive Inspection Report cover letter served as a Notice of Violation for February 2009 exceedance of effluent limit for PCBs from Outfall 003 and provided a summary of corrective action taken by General Motors Corporation prior to June 1, 2009 to address these exceedences.

On November 12, 2009, NYSDEC conducted a RCRA inspection of the site. Findings of the RCRA inspection have not yet been received by MLC.

In a letter dated November 13, 2009, NYSDEC provided comments to USEPA on MLC's October 30th Remediation Cost Estimate Summary. A copy of this letter was hand delivered to MLC during a meeting at NYSDEC headquarters in Albany, New York on November 17, 2009.

On November 19, 2009, MLC provided USEPA with a revised discussion paper (white paper) summarizing MLC's Revised Alternative Approach for Soil Remediation at the Massena Site.

On November 20, 2009, MLC met with USEPA at Region 2 headquarters in New York City to present their October 30th Remediation Cost Estimate for Massena. NYSDEC participated by video conference.

On November 30, 2009, USEPA issued written comments on MLC's November 19th discussion paper (white paper) as well as action items discussed at the November 20th meeting at Region 2 headquarters.

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USEPA scheduled a site visit for December 3, 2009 at the Massena facility to allow a USEPA technical team from Edison, New Jersey to conduct an inspection of the large and small die cast tunnels and historic die cast operations areas to determine the need for additional sampling locations for inclusion in MLC's proposed Sub-Slab Soil Investigation. A meeting to discuss MLC's Remediation Cost Estimate for the site was also scheduled with NYSDEC and the SRMT for the same day. Details of the site visit and meeting will be provided in the December Monthly report to USEPA.

Groundwater Controls

On June 10, 2009, the revised *Interim Groundwater Characterization Sampling and Analysis Report* was submitted to USEPA along with responses to USEPA'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

On October 9, 2009, MLC submitted the *Mohawk Uplands Soil/Sediment Sampling Work Plan* to USEPA for approval.

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) was sampled on November 3, 2009 and Outfall 002 (at the Raquette River) was sampled on November 3, 2009. The analytical results for these water samples are provided in Attachment 1.

Also during the month of November, a total of approximately 114,670 gallons of water (approximately 4,260 gallons from the sump northeast of the Industrial Landfill, 5,210 gallons from the containment cell areas, and 105,200 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 November 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.

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

Quarterly water sampling at the site is planned during December, 2009. Follow-up conference calls with USEPA on the remediation estimates for the Site are being scheduled through December 18th.

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>
Draft Discussion Paper (White Paper) - Revised Alternative Approach for Soil Remediation	November 19, 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

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<u>Previously Submitted to EPA – Pending Comment or Approval</u>	
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
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
MLC letter to EPA – Submittal of draft White Paper containing the Remedial Exit Strategy for the site, Schedule for remaining deliverables, and Mohawk Uplands Soil/Sediment Sampling Work Plan	October 9, 2009
MLC letter to NYSDEC – Petroleum Bulk Storage Name and Operations Change	October 15, 2009
MLC letter to NYSDEC – RCRA Form A Name change	October 15, 2009
MLC Remediation Cost Estimates and Accompanying ARCADIS Backup	October 30, 2009
<u>Comments/Approvals Received from EPA/NYSDEC during the Month</u>	
NYSDEC – Comments on MLC Oct. 30, 2009 Remediation Cost Estimates	November 13, 2009
NYSDEC Division of Water – Agency response to SPDES Inspection of 11/10/09	November 17, 2009
USEPA Letter to MLC – Comments on November 19 th White Paper and follow-up to November 20 th Meeting	November 30, 2009

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Former Central Foundry Massena Superfund Site - Operable Units 1 & 2
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ATTACHMENT 1

Analytical Data

Table 1
Summary of Outfall 002 Water Sampling Analytical Results
Former Central Foundry Massena Superfund Site, New York

PCBs EPA 608 - Hexane Extractable EPA 413.1 - Total Suspended Solids EPA 160.2 - Metals EPA 200.7

#	Sample ID	Date Sampled	Polychlorinated Biphenyls (PCBs) EPA 608			Oil & Grease (Hexane Extractable) EPA 1664A			Total Suspended Solids (TSS) EPA 160.2			Metals USEPA 200.7			
			Detection Limit (ug/l)	Analytical Results (ug/l)	SPDES Permit Limits (ug/l)	Detection Limit (mg/l)	Analytical Results (mg/l)	SPDES Permit Limits (mg/l)	Detection Limit (mg/l)	Analytical Results (mg/l)	SPDES Permit Limits (mg/l)	Aluminum (mg/l)	SPDES Permit Limits (mg/l)	Iron (mg/l)	SPDES Permit Limits (mg/l)
1	12916	15-Nov-07	0.05	U	0.3	1.0	< 1.00	15	1.00	1.50	50	< 0.0500	see note 1. below	0.532	see note 1. below
2	-	No sample collected during December due to frozen conditions.			-	-	-	-	-	-	-	-	-	-	-
3	12966	10-Jan-08	0.0515	U	0.3	1.0	< 1.00	15	1.00	< 1.00	50	< 0.0500	see note 1. below	< 0.0500	see note 1. below
4	12992	18-Feb-08	0.0532	U	0.3	1.0	< 1.00	15	1.00	2.80	50	0.178	see note 1. below	0.175	see note 1. below
5	13026	4-Mar-08	0.0521	U	0.3	1.0	2.90	15	1.00	< 1.00	50	0.0537	see note 1. below	< 0.0500	see note 1. below
6	13054	3-Apr-08	0.0515	U	0.3	1.0	< 1.00	15	1.00	< 1.00	50	< 0.0500	see note 1. below	< 0.0500	see note 1. below
7	13079	1-May-08	0.0515	U	0.3	1.0	< 1.00	15	1.00	< 1.00	50	< 0.0500	see note 1. below	0.147	see note 1. below
8	12941	5-Jun-08	0.0526	U	0.3	1.0	< 1.00	15	1.00	< 1.00	50	< 0.0500	see note 1. below	0.083	see note 1. below
9	13143	21-Jul-08	0.0515	0.0566	0.3	1.0	< 1.00	15	1.00	1.90	50	0.0507	see note 1. below	0.345	see note 1. below
10	13171	7-Aug-08	0.0500	U	0.3	1.0	1.30	15	1.00	5.70	50	0.8830	see note 1. below	1.23	see note 1. below
11	-	No sample collected during September due to dry conditions.			-	-	-	-	-	-	-	-	-	-	-
12	13205	27-Oct-08	0.0500	U	0.3	1.0	1.20	15	1.00	2.60	50	0.108	see note 1. below	0.242	see note 1. below
13	13258	18-Nov-08	0.0505	U	0.3	1.0	< 1.00	15	1.00	< 1.00	50	< 0.0500	see note 1. below	0.0532	see note 1. below
14	13296	2-Dec-08	0.0526	U	0.3	1.0	3.20	15	1.00	< 1.00	50	0.0560	see note 1. below	0.0600	see note 1. below
15	-	No sample collected during January due to frozen conditions.			-	-	-	-	-	-	-	-	-	-	-
16	13347	12-Feb-09	0.0532	U	0.3	1.0	6.30	15	1.00	4.30	50	1.12	see note 1. below	1.16	see note 1. below
17	13382	12-Mar-09	0.0515	U	0.3	1.00	< 1.00	15	1.00	< 1.00	50	0.0646	see note 1. below	0.130	see note 1. below
18	13406	2-Apr-09	0.0515	U	0.3	1.00	< 1.00	15	1.00	< 1.00	50	< 0.0500	see note 1. below	0.217	see note 1. below
19	13433	21-May-09	0.0510	U	0.3	1.00	< 1.00	15	1.00	< 1.00	50	< 0.0500	see note 1. below	0.0848	see note 1. below
20	-	No stormwater runoff at Outfall when checked			-	-	-	-	-	-	-	-	-	-	-
21	13529	6-Aug-09	0.0515	U	0.3	1.00	< 1.00	15	1.00	2.00	50	0.0748	see note 1. below	0.2340	see note 1. below
22	13564	15-Sep-09	0.0521	U	0.3	1.00	< 1.00	15	1.00	< 1.00	50	< 0.0500	see note 1. below	0.0885	see note 1. below
23	13598	8-Oct-09	0.0520	U	0.3	1.00	2.30	15	1.00	< 1.00	50	< 0.0500	see note 1. below	0.1430	see note 1. below
24	13632	3-Nov-09	0.0515	U	0.3	1.00	7.70	15	1.00	< 1.00	50	< 0.0500	see note 1. below	0.1880	see note 1. below

Notes:

- 1). There is no effluent limit on metals for the SPDES Permit.
- 2). Analyses performed by Analytics Corporation, Inc.

Table 2
Summary of Outfall 004 Water Sampling Analytical Results
Former Central Foundry Massena Superfund Site, New York

PCBs EPA 608 - Hexane Extractable EPA 1664A - Total Suspended Solids EPA 160.2 - Metals EPA 200.7

#	Sample ID	Date Sampled	Polychlorinated Biphenyls (PCBs) EPA 608			Oil & Grease (Hexane Extractable) EPA 1664A			Total Suspended Solids (TSS) EPA 160.2			Metals USEPA 200.7				
			Detection Limit (ug/l)	Analytical Results (ug/l)	SPDES Permit Limits (ug/l)	Detection Limit (mg/l)	Analytical Results (mg/l)	SPDES Permit Limits (mg/l)	Detection Limit (mg/l)	Analytical Results (mg/l)	SPDES Permit Limits (mg/l)	Aluminum (mg/l)	SPDES Permit Limits (mg/l)	Iron (mg/l)	SPDES Permit Limits (mg/l)	
1	12917	06-Nov-07	0.0510	U	0.3	1.00	2.5	15	1.00	6.20	50	< 0.0500	see note 1. below	1.80	see note 1. below	
2	-	No sample collected during December due to frozen conditions.					-			-	-		-		-	
3	12967	10-Jan-08	0.0510	U	0.3	1.0	< 1.00	15	1.00	< 1.00	50	< 0.0500	see note 1. below	0.167	see note 1. below	
4	12993	18-Feb-08	0.0510	U	0.3	1.0	< 1.00	15	1.00	2.60	50	0.105	see note 1. below	0.178	see note 1. below	
5	13027	04-Mar-08	0.0505	U	0.3	1.0	3.70	15	1.00	1.40	50	0.110	see note 1. below	0.140	see note 1. below	
6	13055	03-Apr-08	0.0505	U	0.3	1.0	< 1.00	15	1.00	< 1.00	50	< 0.0500	see note 1. below	0.135	see note 1. below	
7	13080	01-May-08	0.0510	U	0.3	1.0	2.10	15	1.00	1.60	50	< 0.0500	see note 1. below	0.630	see note 1. below	
8	12942	05-Jun-08	0.0532	U	0.3	1.0	< 1.00	15	1.00	1.20	50	< 0.0500	see note 1. below	0.724	see note 1. below	
9	13144	01-Jul-08	0.0543	U	0.3	1.0	< 1.00	15	1.00	17.80	50	< 0.0500	see note 1. below	7.10	see note 1. below	
10	13172	04-Aug-08	0.0510	U	0.3	1.0	1.10	15	1.00	7.70	50	< 0.0500	see note 1. below	2.580	see note 1. below	
11	13206	09-Sep-08	0.0510	U	0.3	1.0	< 1.00	15	1.00	24.70	50	0.0655	see note 1. below	1.730	see note 1. below	
12	13231	09-Oct-08	0.0510	U	0.3	1.0	< 1.00	15	1.00	7.60	50	< 0.0500	see note 1. below	3.51	see note 1. below	
13	13259	18-Nov-08	0.0515	U	0.3	1.0	< 1.00	15	1.00	< 1.00	50	< 0.0500	see note 1. below	0.380	see note 1. below	
14	13297	02-Dec-08	0.0515	U	0.3	1.0	< 1.00	15	1.00	< 1.00	50	< 0.0500	see note 1. below	0.244	see note 1. below	
15	-	No sample collected during January due to frozen conditions.					-			-	-		-		-	
16	13348	02-Feb-09	0.0500	U	0.3	1.0	2.30	15	1.00	1.60	50	0.130	see note 1. below	0.152	see note 1. below	
17	13383	11-Mar-09	0.0500	U	0.3	1.0	< 1.00	15	1.00	4.40	50	0.129	see note 1. below	0.177	see note 1. below	
18	13407	02-Apr-09	0.0510	U	0.3	1.0	< 1.00	15	1.00	< 1.00	50	< 0.0500	see note 1. below	0.311	see note 1. below	
19	13434	21-May-09	0.0521	U	0.3	1.0	< 1.00	15	1.00	5.70	50	< 0.0500	see note 1. below	2.75	see note 1. below	
20	13469	30-Jun-09	0.0515	U	0.3	1.0	< 1.00	15	1.00	28.50	50	< 0.0500	see note 1. below	10.80	see note 1. below	
21	13530	06-Aug-09	0.0510	U	0.3	1.0	< 1.00	15	1.00	12.60	50	< 0.0500	see note 1. below	4.74	see note 1. below	
22	13565	15-Sep-09	0.0521	U	0.3	1.0	2.30	15	1.00	4.40	50	< 0.0500	see note 1. below	7.59	see note 1. below	
23	13599	13-Oct-09	0.0510	U	0.3	1.0	< 1.00	15	1.00	7.80	50	< 0.0500	see note 1. below	3.44	see note 1. below	
24	13633	03-Nov-09	0.0515	U	0.3	1.0	< 1.00	15	1.00	1.10	50	< 0.0500	see note 1. below	0.489	see note 1. below	

Notes:

- 1). There is no effluent limit on metals for the SPDES Permit.
- 2). Analyses performed by Analytics Corporation, Inc.

Massena Remediation Program Report Distribution List

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