



November 19, 2007

U.S. EPA Region 5
Waste Pesticides and Toxics Division, DE-9J
77 West Jackson Blvd.
Chicago, IL 60604-3590
Attn: Ms. Mirtha Capiro

RE: General Motors Corporation - Moraine, Ohio
Databox Figures and Revised Supplemental Groundwater Investigation Work
Plan, No. 3

Dear Ms. Capiro:

On behalf of General Motors Corporation (GM), BOW Environmental Solutions, Inc. is submitting the databox figures for the Former Delphi Harrison Thermal Systems, General Motors Truck Group Moraine Assembly Plant, and the former General Motors Powertrain Group Moraine Engine Plant in Moraine, Ohio. Figures 1 and 2 summarize the data for the site-specific volatile organic compound (VOC) for wells screened in the upper and lower aquifers, respectively, from the site-wide annual groundwater monitoring events and the supplemental groundwater investigation through October 2007.

BOW Environmental Solutions, Inc. is also submitting the third Revised Supplemental Groundwater Investigation Work Plan (Work Plan). As detailed below, the purpose of this Work Plan is to gather additional data to support further evaluation of ongoing corrective measures. GM is proposing additional work in the area downgradient of existing well pair GM-68S/D located on-site within the Vehicle Distribution Center where elevated VOC concentrations were detected immediately beneath the regional till which separates the upper and lower aquifers in this area of the facility. After completion of this proposed work, GM will provide U.S. EPA with a report of these supplemental investigation results. This report will include an evaluation of the 2007 supplemental investigation results with respect to the scope of ongoing corrective measures, and propose changes to these corrective measures, if warranted to meet the corrective action objectives.

The objectives for the proposed work scope presented below are to:

- Refine current understanding of the hydrogeology and provide additional characterization of groundwater chemistry downgradient of well pair GM-68S/D. This will be accomplished by profiling the upper and lower aquifer lithology and VOC concentrations in groundwater, and installation of a lower aquifer monitoring well at this location.

Proposed Scope of Work

GM will evaluate one area approximately 500 feet downgradient of well pair GM-68S/D for installation of proposed well GM-82 (Figure 3). The boring location is approximate and may be modified based on utility clearance and site access. The boring will be drilled using rotosonic methodology and continuously sampled for lithologic characterization. Proposed well GM-82 will be drilled to an approximate depth of 25 feet below the regional till, similar to GM-68D. Vertical aquifer profiling for the upper and lower aquifers will be conducted during drilling (approximately every 10-15 ft once the water table is reached) to provide an understanding of the VOC concentration profile. This data will be considered as screening quality and will be used to determine whether to install the well. The groundwater samples will be submitted for expedited laboratory analysis of the site-specific VOC parameter list. Upon evaluation of the groundwater profiling data, a deep upper aquifer well will be installed. If warranted based on review of the VOC concentration profile, an additional area to the southwest/downgradient of GM-82 will be evaluated for additional profiling/well installation.

The newly installed well will be developed and surveyed following procedures defined in the Supplemental RFI Work Plan (ARCADIS 1997). The new well will be sampled following procedures defined in the Site-Wide Groundwater Monitoring Plan (ARCADIS 2002). The groundwater samples will be submitted for laboratory analysis of the site-specific VOC parameter list.

Data Report

The data generated from the 2007 supplemental investigation activities will be used to evaluate hydrogeology and groundwater chemistry in the vicinity of the Great Miami River, Holes Creek, south of RZ-1, and in the general area around GM-41/GM-68 to better assess the current corrective measures. The data report may include a recommendation to add some of these recently installed wells to the site-wide groundwater monitoring program. The data evaluation will include the results of the transducer study, boring logs, groundwater contour maps, tabulated analytical results, geologic cross sections, and analytical results posted in databoxes on figures. In addition, GM will utilize these data to provide an updated assessment of corrective measures performance. Based on this assessment, GM will propose modifications, if warranted, to the ongoing corrective measures to optimize the overall performance and duration of the final corrective measures.

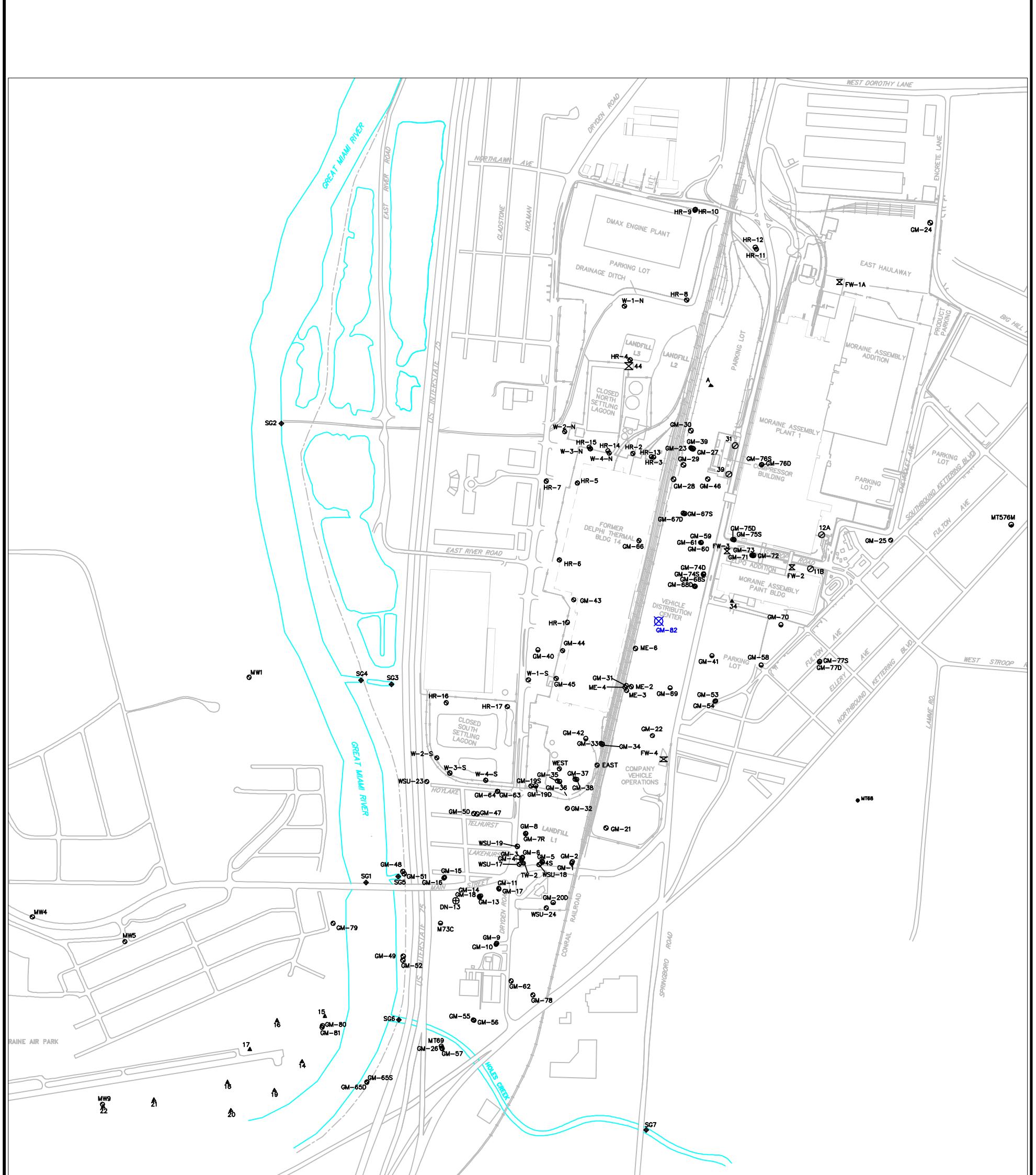
GM will proceed with the field work portion of this proposed Work Plan when site access and utility clearances are finalized. The drilling is scheduled to be completed in December 2007. Please call 937-455-2636, if you have any questions.

Sincerely,



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

cc: H. O'Connell, Ohio EPA
J. Caufield, GM Remediation



LEGEND	
	PROPOSED MONITORING WELL
	MONITORING WELL (UPPER AQUIFER)
	RECOVERY WELL
	STREAM GAUGE
	WELL WSU-22 DAMAGED AND NO LONGER USABLE, WELL TO BE ABANDONED
	CITY WELL
	FORMER BUILDING 14 FOOTPRINT
	RIVER LEVEE