



**Remediation and Liability
Management Company, Inc.**

MC: 483-520-190
2000 Centerpoint Parkway
Pontiac, Michigan 48341
(248) 753-5776
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August 16, 2006

Mr. James E. Innes
Michigan Department of Environmental Quality
Remediation and Redevelopment Division
Constitution Hall
525 West Allegan Street
Lansing, MI 48909

Re: Hemphill Landfill Site
Flint, Michigan

Dear Mr. Innes:

This letter is written to inform you of our response activities intended to evaluate and address environmental conditions at the GM Burton Parcel, which is a part of the Hemphill Landfill (Site) located in Burton, Michigan. As you know, there have been multiple owners who conducted different operations in different parts of the Site. Currently, we are in the process of gathering and evaluating Site information in order to identify the most effect approach which would result in the submittal of a remedial action plan.

Remediation and Liability Management Company, Inc. (REALM), a wholly owned subsidiary of General Motors Corporation, plans to submit a brief Work Plan (for Michigan Department of Environmental Quality (MDEQ) review) to perform investigation work associated with assessing ground water flow conditions on the REALM portion of the Site, known as the Burton Parcel as outlined on Figure 1. The collection of this additional data is intended to provide information to better understand ground water flow conditions and evaluate potential future investigation. The Site remediation strategy at this time includes evaluating options for achieving either a Generic or Limited Commercial/Industrial Closure and evaluating remedial actions appropriate to mitigate potential migration pathways associated with REALM's potential liability.

At our meeting held on February 9, 2006, the MDEQ requested REALM provide the names of potentially responsible parties associated with placing waste materials in the Hemphill Landfill. While it is not REALM's responsibility to gather liability information on other parties, we had previously identified several different owners and/or operators. Based on our previous research, specifically the Proceedings of the Board of Supervisors of Genesee County (1940 through 1944) there is documentation indicating the City of Burton owned the Hemphill Landfill and leased the property to individuals

who were allowed to place fill material in low lying areas on the property. The Proceedings for the April 25, 1941 meeting indicate the City of Burton leased the property to an individual who was to start to fill the land within 15 days of signing the lease. He was to continue filling the area for the duration of the lease (5 yrs). According to the October 5, 1943 Proceedings, the City of Burton leased the property to an individual who was able to claim articles that he may salvage and he was to bury dead animals at a sufficient depth to meet sanitary requirements. Waste disposed at the Site was likely generated by local residents and businesses. The City of Burton would be considered an owner, operator and generator at the Site.

Another party who has conducted activities at the Site is the Genesee County Drain Commission, which constructed and operates a surface water control facility and drainage conveyances on a portion of the Site. They are an owner and operator of a portion of the Site and have, at a minimum, due care obligations.

In addition, Mr. Robert E. Brown II (3029 Ponemah Fenton, Michigan 48430) is the current property owner of the parcel (PID# 25-59-29-300-010) located east of the GM property and Flint Investment LLC (37622 Jonquil Court Westland, Michigan 48185) is the current property owner of the parcel (PID #59-29-551-026) located south of the REALM property. A figure depicting these properties in relation to the REALM owned property is attached as Figure 1. As owners of potentially contaminated property they may have potential liability for investigating and remediating the historic land filling of the parcels. They also have due care responsibilities.

Finally, it is our understanding the Sunoco Service Station (Site # 00018528) located adjacent to the east of the Hemphill Landfill reported a release (Incident number C-1002-00) on December 28, 2000. A Notice to Impacted Parties of Corrective Action form (EQP 3852) was submitted to the City of Burton and the Genesee County Road Commission on June 22, 2001. However, analytical results reported in the Burton Parcel Additional Investigation Report dated March 2001 (provided to the MDEQ in March 2001), indicates concentrations of benzene in soil, and concentrations of benzene, ethylbenzene, xylenes and dissolved lead in ground water are above the MDEQ Generic Residential criteria at soil boring locations on the Burton Parcel in close proximity to the Sunoco Service Station. It is likely these concentrations are associated with the reported release at the Sunoco Service Station. REALM has not been notified regarding potential investigation at the REALM property to assess the extent of impact to soil and ground water, or intention of the owner/operator to cleanup potential impact at the REALM property. We request you provide information on the status of this open release site.

REALM will work with the MDEQ to address the environmental conditions associated with the GM Burton Parcel, but believe addressing the entire Site will need the involvement of other parties as well. We hope that MDEQ will be instrumental in notifying and coordinating with the various parties to ensure all of the necessary work is

Mr. James E. Innes
August 16, 2006
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properly apportioned. If you have any questions or would like additional information, please contact me at 248-753-5702.

Sincerely,



David Worrell, P.E.
Project Manager
General Motors Corporation / REALM

cc: Tony Finch - O'Brien & Gere Engineers, Inc., Farmington Hills, MI



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August 21, 2006

Mr. James E. Innes
MDEQ – RRD
Constitution Hall
525 West Allegan Street
Lansing, MI 48909

Re: Hemphill Landfill Site
Flint, Michigan

Mr. Innes:

This letter transmits Figure 1, Burton Parcel and Neighboring Properties, Burton, Michigan. The figure was inadvertently left out of the correspondence submitted to MDEQ on August 16, 2006.

If you have any questions, please call me at 248.753.5702.

Sincerely,

David Worrell
Project Manager
General Motors Corporation / REALM

Cc Anthony Finch, O'Brien & Gere