



General Motors  
Environmental and Energy Staff  
Remediation Group  
Argo "A" - 10th Floor  
485 W. Milwaukee  
Detroit, MI 48202

December 7, 1993

Ms. Barbara Cowles  
Department of Natural Resources  
Environmental Response Division  
Shiawassee District Office  
10650 S. Bennett Drive  
Morrice, MI 48857



RE: Linden Road Landfill

Dear Ms. Cowles:

I received your letter to me regarding the captioned site, dated November 15, 1993. Due to the recent relocation of the Environmental & Energy Staff I did not receive it until November 24 at which time I attempted to contact you, without success. I apologize for not providing you with my new address earlier.

In any event, the only conclusion I can reach after reading your letter is that there is apparently some misunderstanding of what investigation activities GM has completed to date and when the Interim Measures Removal Action Completion Report will be available. This is quite possible, since our previous contact with DNR has been through Region III headquarters in Lansing.

By way of history, the landfill is owned by GM and was operated until approximately 1969 for disposing of general plant refuse. The landfill is located adjacent to, and hydraulically downgradient of, another non-GM landfill. GM constructed a perimeter fence and began groundwater monitoring at the site in 1980. The groundwater monitoring data was provided to DNR. GM voluntarily conducted and submitted to DNR for review, the following documents:

- 1) Phase I Environmental Assessment (February 1990);
- 2) Site Investigation Work Plan (July 1990);
- 3) Interim Remedial Measures Evaluation Work Plan (July 1990);
- 4) Interim Remedial Measures Evaluation and Site Investigation Report (March 1992);
- 5) Work Plan For Interim Remedial Measures Removal Action (August 1992);
- 6) Groundwater Sampling Results - Round III (December 1992).

From your letter requesting "a work plan that, when implemented, will define the full horizontal and vertical extent of both soil and groundwater contamination", I



assume you were not aware of either the July 1990 work plan or March 1992 report. The full horizontal and vertical extent of soil and groundwater contamination was determined from the site investigation. As well, GM conducted several earlier site assessments in the 1980's. I suggest you review the Lansing file, or alternatively GM can provide missing documents, to facilitate your review of the work already completed.

Your letter also requests GM to submit the Completion Report and waste manifests from the December 1992 Interim Remedial Measures Removal Action by December 17, 1993. Due to some seasonal delay in removing the roll-off boxes containing the soil and waste and additional delays by the accepting facility in issuing the waste stream approvals, we have only just received the last of the notification of waste acceptance documents. Our consulting firm, Weston, will finalize the Completion Report and I will forward a copy to you as soon as possible but no later than January of 1994.

Finally, you request the results of any additional groundwater monitoring since the December 1992 round. GM has not conducted any additional groundwater sampling and has no current plans until a long term monitoring plan can be prepared as part of the Remedial Action Plan (RAP). GM has, at the recommendation of our consultant, abandoned the monitoring wells installed by Keck in 1979. These wells were deemed to be unsuitable for monitoring during the site investigation and thus additional wells were installed. The abandonment program was implemented from late November to early December of 1993. A well abandonment report will be provided to DNR in January of 1994.

I am sure you will agree, once you have had time to review the complete file, that GM has conducted a comprehensive remedial investigation and undertaken appropriate removal actions on an aggressive schedule. We anticipate initiating preparation of a RAP consistent with recommendations in the Interim Remedial Measures Evaluation and Site Investigation Report, in 1994.

GM looks forward to working with you to facilitate an expeditious final remedial action at the site. If you have any questions or comments, please contact me at (313) 556-0889.

Sincerely,



Edward Peterson