



January 8, 2010

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. 212 for December 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 December 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 that reads "Pamela L. Barnett". The signature is written in a cursive style.

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

Monthly Progress Report No. 212 – December 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 (December 1 through December 31, 2009)

Site Wide

On December 31, 2009, MLC sent a letter to NYSDEC Division of Water, requesting a meeting to discuss the extension of MLC's SPDES permit request dated September 10, 2009.

On December 3, 2009, USEPA, NYSDEC, and the SRMT met with MLC at the site to discuss the remedial area volume estimates and to provide a site tour to a technical team from USEPA Edison, New Jersey office. The purpose of the tour was to get the team familiar with the interior of the buildings at the site including the die-cast tunnel systems. During the visit the US EPA collected a total of 5 samples from the tunnels for analyses of PCBs. USEPA split all 5 of the samples with MLC for PCB analyses. Results of the analyses are presented in Table 3 of Attachment 1.

In a letter dated December 3, 2009, USEPA provided response comments to MLC's October 1, 2009 Sub-Slab Sampling proposal. The letter directed MLC to collect samples from 24 new locations in addition to the original proposed 18 locations. On December 14, 2009, MLC submitted the draft Sub-Slab Soil Investigation Work Plan to USEPA for approval. On December 16, 2009, USEPA provided comments to the work plan directing MLC to collect samples from an additional 27 locations bringing the total locations count to 69 locations. MLC and USEPA are continuing negotiations for approval of the work plan.

During the week of December 7, Arcadis generated a model for the EDA which provided a visual 3-dimensional view of the impacted soils in the EDA (main and infield areas). This model was provided to the US EPA and AECOM and a call was held to describe the results and how the model was generated.

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

Groundwater Controls

On December 28, 2009, GM collected quarterly groundwater samples from the sump northeast of the Industrial Landfill. Analytical results for the water samples are pending.

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.

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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

On December 28, 2009, GM collected a quarterly sump water samples from the underdrain beneath GM Process Water Lagoon #2 (former 350,000 gallon lagoon). Analytical results for the water samples are pending.

Outfall 004 (north of the Industrial Landfill) and Outfall 002 (at the Raquette River) were sampled on December 3, 2009. The analytical results for these water samples are provided in Attachment 1.

Also during the month of December, a total of approximately 156,000 gallons of water (approximately 5,090 gallons from the sump northeast of the Industrial Landfill; 5,560 gallons from the containment cell areas, and 145,350 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 December 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.
- Table 3 – Split Sample Analytical Results from Small Die-Cast Tunnel Locations.

Results are provided in the tables in Attachment 1.

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III. Project Tasks Scheduled for the Coming Month (January 2010)

Follow-up conference calls with US EPA on the remediation estimates for the Site are being scheduled. MLC is continuing discussions with US EPA on the proposed Sub-Slab Soil Investigation Work Plan.

MLC also anticipates receiving approval from US EPA 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 Sub-Slab Soil Investigation Work Plan	December 14, 2009
MLC Letter to NYSDEC Division of Water requesting meeting on SPDES Permit	December 31, 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
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

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<u>Previously Submitted to EPA – Pending Comment or Approval (continued)</u>	
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
Discussion Paper (White Paper) - Revised Alternative Approach for Soil Remediation	November 19, 2009

<u>Comments/Approvals Received from EPA/NYSDEC during the Month</u>	
USEPA – Comments on MLC Oct. 1, 2009 Sub-Slab Investigation Proposal	December 3, 2009
USEPA – Comments on draft Sub-Slab Soil Investigation Work Plan	December 16, 2009

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Former Central Foundry Massena Superfund Site - Operable Units 1 & 2
USEPA Unilateral Administrative Orders Nos. II CERCLA - 20207 & 20215

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	-	No sample collected during December due to frozen conditions.			-			-	-		-		-		
2	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
3	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
4	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
5	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
6	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
7	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
8	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
9	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
10	-	No sample collected during September due to dry conditions.			-			-	-		-		-		
11	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
12	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
13	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
14	-	No sample collected during January due to frozen conditions.			-			-	-		-		-		
15	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
16	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
17	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
18	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
19	-	No stormwater runoff at Outfall when checked													
20	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
21	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
22	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
23	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
24	13667	3-Dec-10	0.0515	U	0.3	1.00	< 1.00	15	1.00	3.60	50	0.3550	see note 1. below	0.3790	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	-	No sample collected during December due to frozen conditions.			-			-	-		-		-		
2	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
3	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
4	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
5	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
6	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
7	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
8	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
9	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
10	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
11	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
12	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
13	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
14	-	No sample collected during January due to frozen conditions.			-			-	-		-		-		
15	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
16	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
17	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
18	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
19	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
20	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
21	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
22	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
23	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
24	13668	03-Dec-10	0.0521	U	0.3	1.0	< 1.00	15	1.00	4.00	50	0.8130	see note 1. below	0.868	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 3
Split Sample Analytical Results from Small Die-Cast Tunnel Locations
 USEPA Method SW-846 8082

#	Sample Date	Sample Time	Sample ID	Sample Location Description	Detection Limit (mg/kg)	Aroclor 1248 (mg/kg)	Total PCBs (mg/kg)
1	12/3/09	15:33	Tunnel 2 Trench SDC	Concrete/soil sample, sample collected by chipping through what appeared to be thin layer of deteriorated concrete (approx. 1/2 inch) using a geologist pick. This thin layer is at the soil/slab interface, exposed in an existing open saw cut in the concrete. Sample was collected from the trench at the end of Tunnel 2 where the trench drains to the large tunnel at the north side of the building.	< 553.0	2330.0	2330.0
2	12/3/09	15:54	Tunnel 1 Trench SDC	Concrete/soil sample, sample collected by chipping through what appeared to be another thin layer of deteriorated concrete (approx. 1/2 inch) using a geologist pick. This thin layer is at the soil/slab interface, exposed in an existing open saw cut in the concrete. Sample was collected from the trench at the end of Tunnel 1 where the trench drains to the large tunnel at the north side of the building.	< 554.0	1770.0	1770.0
3	12/3/09	16:15	Tunnel 9 SP SDC	Solids sample collected from material in the bottom of a sump pit located at the end of Tunnel 6. Sump was circular with diameter of approx. 18-inches and appeared to be a floor drain for process or mill water return.	< 824.0	2490.0	2490.0
4	12/3/09	16:38	Tunnel 1 Trench Oily Debris SDC	Oily sludge sample was collected from the trench located in Tunnel 1, 58-feet from the north access wall. A small visible area of standing oil was noted adjacent to the sludge in the bottom of the trench.	< 1010.0	7040.0	7040.0
5	12/3/09	16:52	Tunnel 9 & 7 SP SDC	Solids sample collected from oily material in the bottom of a sump pit located at the confluence Tunnel 6 and Tunnel 9. Sump was a rectangle measuring approx. 3-feet by 2-feet wide by 2-3 feet deep and appeared to be a floor drain for the tunnels.	< 797.0	2890.0	2890.0

Massena Remediation Program Report Distribution List

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