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REGION 5
Brad Saunders
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

Jun 18, 2009 07:23

REPLY TO THE ATTENTION OF:

March 19, 2007

Kim D. Tucker-Billingslea
Worldwide Facilities Group Remediation Team
Pontiac Centerpoint Campus
2000 Centerpoint Parkway
MC 483-520-190
Pontiac, Michigan 48341-3147

RE: No Further Interest Request
General Motors Corporation
13000 Eckles Road site, Livonia, Michigan
(MID 005 356 621)

Dear Ms. Billingslea:

This letter is in reply to a request from General Motors Corporation (GM) to the United States Environmental Protection Agency (U.S. EPA) for a *No Further Interest (NFI)* letter for a portion of the former GM Delphi Chassis Systems property located at 13000 Eckles Road (Property) in Livonia, Michigan. It is U.S. EPA's understanding that the Property in question (see enclosed map) encompasses approximately 110 acres and does not include the parcel presently owned by REALM, a subsidiary of GM. GM is requesting an NFI letter with respect to its federal corrective action obligations under the Resource Conservation and Recovery Act (RCRA), including further investigations and corrective measures. This response is provided solely for informational purposes and is based on the U.S. EPA's current knowledge of existing environmental conditions at the Property.

Our records show that the nature and extent of contamination at the Property were characterized through a series of investigations. These investigations have included a Current Conditions Report and RFI Reports (Stages I through X). Several interim measures were also performed over time, including: the installation and operation of a French drain collection system to reduce concentrations of nickel and chromium in groundwater; removal of PCB's in soil at AOI 31 to below 1 ppm; removal of benzo(a) pyrene at AOI 5 to below the cleanup goal of 8 ppm; and, the installation of a barrier wall around Area 1 to control groundwater flow in the west/southwest area of the site.

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Based on the results of those investigations, in addition to the interim measures described above, GM has performed corrective measures at the Property that have resolved most of its corrective action obligations pursuant to the Final Decision issued by the U.S. EPA on March 13, 2006. These measures have included: the removal of PCB contaminated soil at AOI 27, AOI 37 and Area 3 to below 50 ppm; the development of a particulate emissions control plan for AOI 39; installation and operation of a treatment system at AOI 31 to reduce concentrations of TCE in groundwater to below cleanup goals that are protective based on current and reasonably expected future groundwater use; and the filing of a restrictive covenant to restrict land use to non-residential purposes and prohibit groundwater use at the Property.

Based on current knowledge of the conditions at the Property, the U.S. EPA neither plans nor anticipates any further corrective actions at the Property, contingent upon the following conditions being met pursuant to an Administrative Order on Consent issued to GM under Section 3008(h) of the Solid Waste Disposal Act:

1. Continued operation and monitoring of the French drain collection system, treatment system and barrier wall to control the off-site migration of chromium and nickel-impacted groundwater and the discharge of treated groundwater in compliance with applicable standards (see enclosed map);
2. Implementation of a groundwater monitoring program at Area 1, AOI 31 and AOI 21 to confirm that concentrations in these areas remain stable and meet risk based criteria under current and reasonably expected groundwater exposures (see enclosed map);
3. Maintenance of and compliance with the restrictive covenant to restrict use of the Property to non-residential purposes and prohibit groundwater use at the Property unless and until groundwater meets applicable performance standards; and
4. Implementation of and compliance with the Dust Control Plan to control particulate emissions from surface soils along the northern boundary of the Property, referred to as AOI 39 (see enclosed map).

The U.S. EPA does, however, reserve the right to require additional Corrective Action should information become available or should there be a change in site conditions that indicate that there was/is a release of hazardous constituents to the environment which may pose a threat to human health and the environment. Further Corrective Action may also be required if information contained in the administrative record regarding the Property is invalid or inaccurate. Finally, please be advised that the State of Michigan also has Corrective Action authorities and this NFI letter does not bind the State.

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If you have any questions regarding the above matter, or if we can be of any further assistance, please do not hesitate to contact me at (312) 886-6945 or Mr. Daniel Patulski of my staff at (312) 886-0656.

Sincerely,



Jose Cisneros, Chief
Waste Management Branch

Enclosure

cc: Steve Buda, MDEQ
Richard Conforti, MDEQ
Tom Krueger, EPA/ORC
Hak Cho, EPA/CAS

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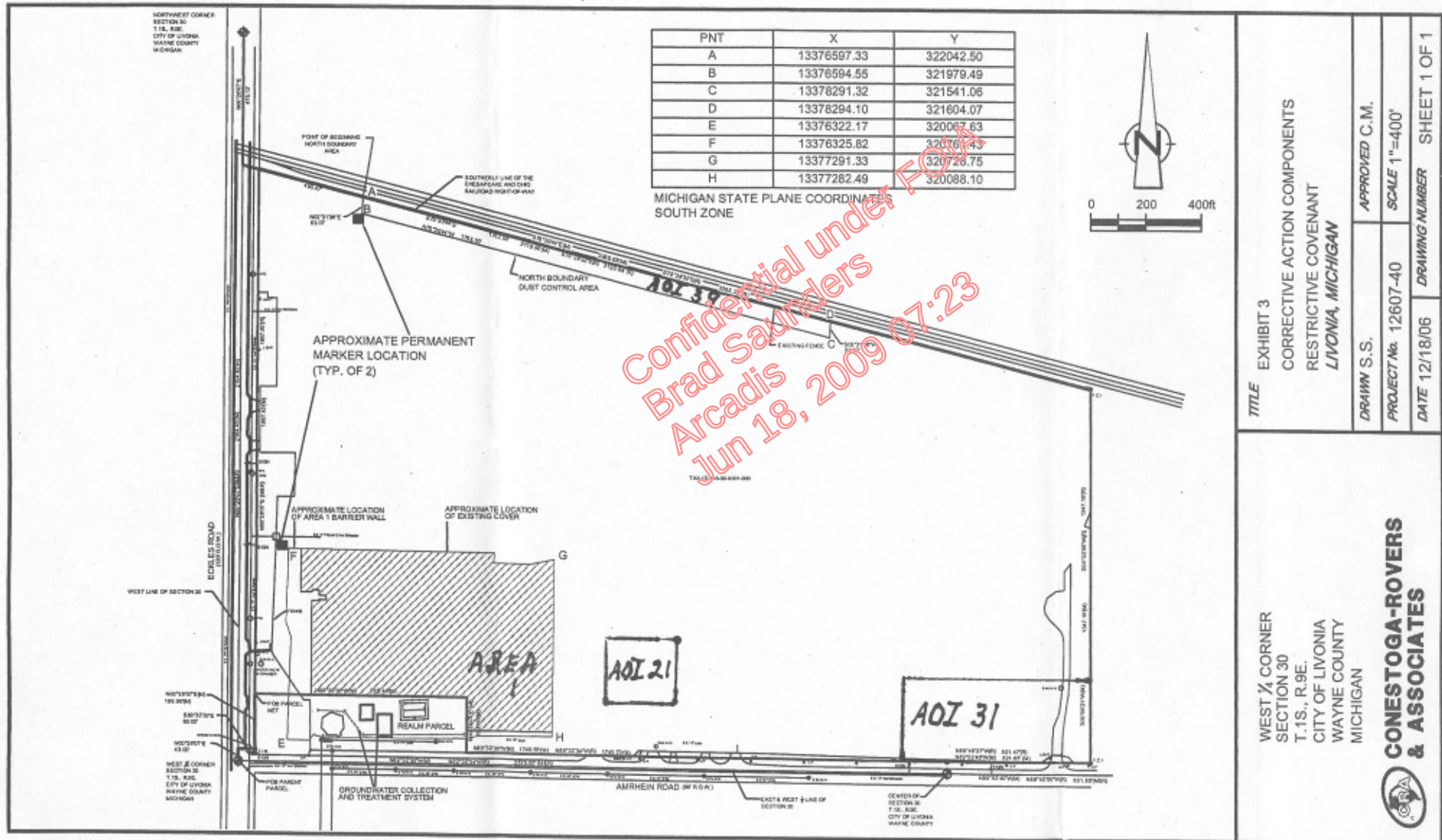
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