

MEMO

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From:

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Date:

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Arcadis Project No.:

30042883

Subject:

RACER Pontiac North Campus
Former Fiero Powerhouse Panhandle Environmental Summary

The Former Fiero Powerhouse Panhandle (Panhandle - southern portion of parcel 14-20-201-004) (See Figure 1) is part of the Pontiac North Campus that is being addressed through RCRA Corrective Action along with other applicable parcels that are part of the Pontiac North Campus. The Panhandle is approximately 2.9 acres. No soil boring or groundwater monitoring wells were installed on this portion of the property as part of the 2002 RCRA Facility Investigation (RFI) (ENCORE 2002) or the 2012 RFI (Arcadis 2012), nor were any installed following these investigations and reports in this portion of the property.

In the 2001 ENCORE Current Conditions Report (CCR), one area of interest (AOI) was identified within the Panhandle. AOI F-4 was identified as a closed container storage area (CSA). The area managed both liquid and solid waste, and was previously identified as solid waste management unit 4 (SWMU 4) in the Fiero Preliminary Assessment/Visual Site Inspection (PA/VSI) Report (PRC 1992) that was prepared for U.S. Environmental Protection Agency (USEPA) Region 5. Therefore, it was considered an AOI in the CCR. However, no AOCs were identified in the PA/VSI Report. Records indicate that the closed CSA was in operation from before 1977 to August 1985. The closed CSA was situated on a bermed concrete pad with a maximum capacity of three hundred seventy-five 55-gallon drums. Wastes included scraped sealers, adhesives, paint thinners, and waste solvents.

The facility stopped using the CSA (SWMU 4) on August 15, 1985. Records indicate that the facility removed 37 containers from the SWMU 4, removed visible residue from the concrete pad, swept the area, and washed it with detergent and water. Wastewater was collected and transferred to the wastewater

treatment plant. The CSA berm and concrete pad was dismantled, removed, and paved. There were no documented releases from the closed CSA.

General Motors Corporation (GM) submitted a closure plan to Michigan Department of Natural Resources (MDNR) for the closed CSA in April 1986 (after the area was out of service). GM collected eight soil samples in the area surrounding the closed CSA. Four of these were background from the area surrounding the unit. Sampling results showed soils to exceed the extraction procedure toxicity standards for zinc, chromium, barium, and lead (PRC 1992). No location details, sample dates, or laboratory results were provided in the PA/VSIs. Closure certification was submitted to MDNR in November 1986, and GM received clean closure certification for the area from the Michigan Department of Natural Resources (MDNR), predecessor to the Michigan Department of Environment, Great Lakes, and Energy (EGLE), in February 1988. Per the CCR, no further action was recommended for this AOI.

An ENCORE RFI Work Plan Addendum No. 13 (ENCORE 2004) makes reference to an ATEC Associates, Inc. 1999 Environmental Site Assessment report (ATEC 1999) which indicates that two soil borings, SB-6 and SB-7, were installed in the AOI F-4 area. The RFI Work Plan Addendum No. 13 states that the ATEC report indicated that analytical data from soil borings SB-6 and SB-7 did not contain volatile organic compounds (VOCs) or semi-volatile organic compounds (SVOCs) above the laboratory quantitation limit. Although no specific sample dates or laboratory results were included in the RFI Work Plan Addendum No. 13 for these two soil borings, their locations were provided and are shown on Figure 1.

Although not located in the Fiero Panhandle, a former Fiero wastewater treatment plant (WWTP), constructed of above-grade steel tanks situated on a concrete pad with secondary containment, was located north of the closed CSA and operated from 1973 through 1983. As outlined in the ENCORE 2001 CCR and the PA/VSIs Report, no documented releases were associated with the WWTP and due to its construction, no further action was recommended for this area in the CCR, and no additional investigations were necessary in the 2012 RFI.

Groundwater across the Pontiac North Campus generally flows towards the southwest. Offsite wells downgradient of the Fiero Panhandle are located along East Montcalm Street and act as indicators if any significant release occurred from upgradient areas of interest including the closed CSA as well as other portions of the Fiero property. These offsite wells have been historically and more recently sampled for VOCs and do not contain concentrations which exceed applicable criteria.

Proposed corrective measures associated with the Panhandle, similar to the entire bounds of the Former Fiero Powerhouse property, are currently anticipated to include the following:

- Deed restrictions, including but not limited to the below;
 - o limit the use of the property to commercial or industrial uses (non-residential)
 - o limit the ability to excavate or construct any sub-grade structures without properly managing/disposing of excavated material and implementing appropriate health and safety procedures as required by EGLE soil management requirements and OSHA
 - o prohibit extraction or use of groundwater from the property
 - o soil vapor management
- Off-site groundwater ordinance which prohibits the installation of wells for groundwater use within the ordinance area

References

Arcadis. 2012. RCRA Facilities Investigation, Pontiac North Campus. Pontiac, Michigan. July 9.

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ATEC Associates, Inc. 1999. Environmental Site Assessment, General Motors Corporation, C-P-C Fiero Assembly Plant. General Motors Corporation, Pontiac, Michigan.

ENCORE. 2001. Current Conditions Report, Pontiac North Campus, Volume I of IV. General Motors Corporation. Pontiac, Michigan. January 31.

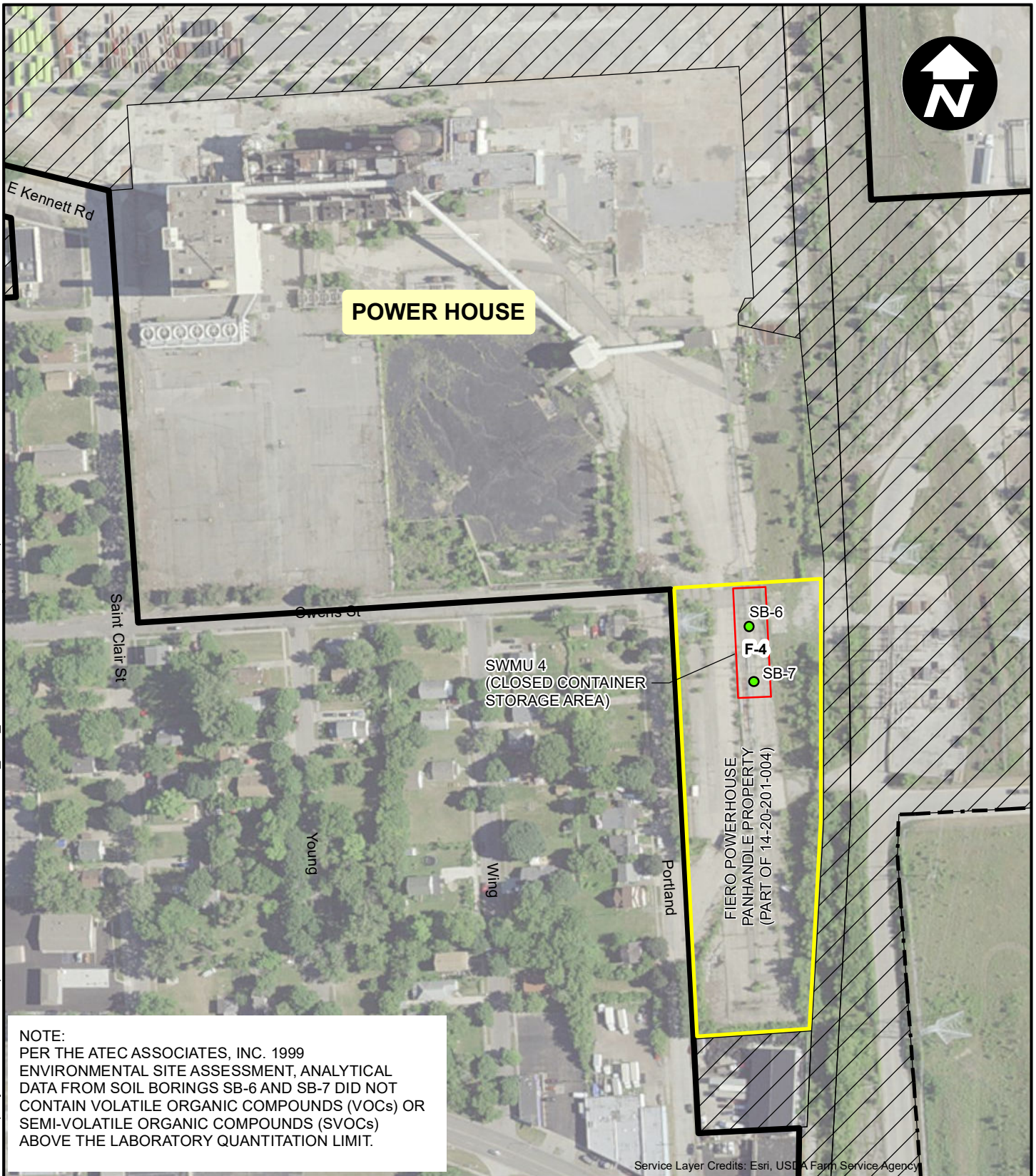
Environmental Corporate Remediation (ENCORE). 2002. RCRA Facility Investigation (RFI) Report, Pontiac North Campus. General Motors Corporation. Pontiac, Michigan. April 29.

ENCORE. 2004. RCRA Facility Investigation (RFI) Work Plan Addendum No. 13. Fiero (Plant 17) Sewer and Subsurface Investigations. Pontiac North Campus. General Motors Corporation. Pontiac, Michigan. September 24.

PRC. 1992. Preliminary Assessment/Visual Site Inspection (PA/VS) Report. GM Corporation, Pontiac Fiero Plant. Pontiac, Michigan. November 5.

Attachments - Figures

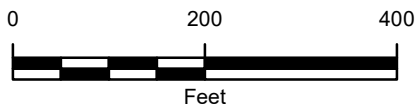
Figure 1 Fiero Powerhouse Panhandle Property



NOTE:
PER THE ATEC ASSOCIATES, INC. 1999
ENVIRONMENTAL SITE ASSESSMENT, ANALYTICAL
DATA FROM SOIL BORINGS SB-6 AND SB-7 DID NOT
CONTAIN VOLATILE ORGANIC COMPOUNDS (VOCs) OR
SEMI-VOLATILE ORGANIC COMPOUNDS (SVOCs)
ABOVE THE LABORATORY QUANTITATION LIMIT.

Legend

- SOIL BORING
- USPS DISTRIBUTION CENTER PROPERTY BOUNDARY
- FIERO POWERHOUSE PANHANDLE PROPERTY
- PNC PROPERTY (GMC)
- PROPERTY SOLD BY RACER
- APPROXIMATE AREA OF INTEREST (AOI)



RACER TRUST
PONTIAC NORTH CAMPUS
PONTIAC, MICHIGAN

FIERO POWERHOUSE PANHANDLE PROPERTY