



MASSENA PLANT
P.O. Box 460
Massena, New York
13662-0460

May 10, 2009

Chief, New York/Caribbean Superfund Branch
Emergency and Remedial Response Division
U.S. Environmental Protection Agency - Region II
290 Broadway, 19th Floor
New York, New York 10007-1866

Attention: GM/Massena Superfund Site Project Manager

Re: General Motors-Massena Superfund Site, Massena, New York
EPA Orders Index No. II CERCLA-20207 and 20215
-- Monthly Progress Report No. 204 for April 2009

Dear Ms. Anne Kelly:

Enclosed please find two copies of the Monthly Progress Report relating to the activities performed during the month of April 2009, in conformance with the Unilateral Administrative Orders for both operable units of the General Motors Massena Superfund Site.

Should you or your staff have any questions regarding the contents of the Progress Report, please contact me at (315) 764-2239 or Jim Hartnett at (315) 463-2391.

Sincerely,

A handwritten signature in red ink that reads "DC Premo".

Douglas C. Premo
GM Project Coordinator

Monthly Progress Report No. 204 – April 2009
General Motors Massena Superfund Site - Operable Units 1 & 2
USEPA Unilateral Administrative Orders Nos. II CERCLA - 20207 & 20215

I. Compliance Activities Completed for the Period (April 1 through April 30, 2008)

Site Wide

Consistent with the schedule provided in Attachment 1 in GM's letter of March 26, 2009 response to USEPA's letter of March 3, 2009; GM collected additional media samples (concrete cores, paint chip and wipe samples) within the facility from February 24, 2009 to March 5, 2009 and from April 21 to April 23, 2009. GM is currently evaluating this analytical data and will submit this data to USEPA during June 2009.

East Disposal Area

GM submitted the *Soil Investigation Work Plan – East Disposal Area Infield* to USEPA on August 15, 2008. The proposed sampling provides for the collection and analysis of soil samples for PCBs from an area designated as the East Disposal Area Infield. This Work Plan is designed to delineate the horizontal and vertical extents of PCBs exceeding the 10 and 500 mg/kg PCB site cleanup goals for this area. On November 23, 2008, GM received draft comments from USEPA and continued discussions with USEPA on the scope of work of the EDA investigation. On December 29, 2008, USEPA gave verbal approval of the work plan provided that the draft USEPA comments on the work plan would be incorporated into the work plan. Due to the onset of winter, the work was postponed until early summer 2009. GM is anticipating that USEPA will be sending out written approval of the work plan. Upon receipt of written approval from EPA, GM will prepare a final work plan for submittal and a schedule for performance of the field work.

Groundwater Controls

On March 25, 2009, GM collected quarterly groundwater samples from the sump northeast of the Industrial Landfill. Analytical results for the March 25, 2009, quarterly groundwater samples collected from the sump northeast of the Industrial Landfill are provided in Attachment I.

On October 19, 2007 GM submitted the *Interim Groundwater Characterization Sampling and Analysis Report* (CDM, 2007). GM is awaiting comments from USEPA on this report. The report includes an assessment of the validated analytical results from the November 2006 and May 2007 groundwater sampling events. The results of the study provide the necessary information to modify the groundwater remedial plans as discussed during a meeting with the government agencies on May 23, 2006. GM is awaiting comments from USEPA on this report.

On September 25, 2006, GM submitted the draft *Quality Assurance Project Plan (QAPP)* to USEPA for approval. GM is awaiting approval from USEPA of this plan.

Mohawk Uplands Soils

The *Mohawk Upland Area Remedial Action Completion Report* was submitted to USEPA on February 6, 2008. GM is awaiting approval from USEPA of the 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.

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General Motors Massena Superfund Site - Operable Units 1 & 2
USEPA Unilateral Administrative Orders Nos. II CERCLA - 20207 & 20215

Cove Project

On April 24, 2006, GM submitted the revised draft *Cove Remedial Action Completion Report* to USEPA for approval. GM is still awaiting USEPA's approval of this report.

Maintenance Activities

Analytical results for the March 25, 2009, quarterly water samples collected from the sump water samples from the underdrain beneath GM Process Water Lagoon #2 (former 350,000 gallon lagoon) are provided in Attachment I.

Outfall 004 (north of the Industrial Landfill) and Outfall 002 (at the Raquette River) were sampled on April 2, 2009. The analytical results for Outfall 002 and Outfall 004 are provided in Attachment I.

Also during the month of April, a total of approximately 8,090 gallons of water (approximately 5,008 gallons from the sump northeast of the Industrial Landfill and 3,082_ gallons from the containment cell areas) were transferred to GM's WWTS for treatment.

II. Analytical Data

Analytical results received during the month of April for the GM 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 – Summary of Quarterly Water Samples NE of the Industrial Landfill Force Main
- Table 4 - Groundwater Sump Process Water Lagoon #2 Water Analytical Results.

III. Project Tasks Scheduled for the Coming Month (May 2009)

GM anticipates receiving final comments from USEPA on the *Soil Investigation Work Plan – East Disposal Area Infield*. Upon receipt of the USEPA approval letter, GM anticipates finalizing and submitting the work plan and scheduling the field work.. GM also anticipates receiving approval from USEPA on the Quality Assurance Project Plan, and the GM Site Inspection, Monitoring, and Maintenance Plan, the Cove Remedial Action Completion Report, the Interim Groundwater Characterization Sampling and Analysis Report and the Mohawk Upland Area Remedial Action Completion Report.

IV. Project Status, Delays and Recovery Plans

Monthly Progress Report No. 204 – April 2009
General Motors Massena Superfund Site - Operable Units 1 & 2
USEPA Unilateral Administrative Orders Nos. II CERCLA - 20207 & 20215

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>
- none -	
<u>Previously Submitted to EPA - Pending Comment or Approval</u>	
Industrial Landfill Final Design Report, Vols. I & II	Apr 27, 2001
Draft Cove Remedial Action Completion Report	Apr 24, 2006
Draft Quality Assurance Project Plan	Sept 25, 2006
Draft GM Site Inspection, Monitoring, and Maintenance Plan	Jan 26, 2007
Interim Groundwater Characterization Sampling and Analysis Report	Oct 19, 2007
Mohawk Upland Area Remedial Action Completion Report	Feb 6, 2008
Soil Investigation Work Plan East Disposal Area Infield	Aug 15, 2008
Results of 2008 Fish Collection Activities to Evaluate Fish	
Consumption Advisory in Remediated Cove, St. Lawrence River	Dec. 19, 2008
St. Lawrence River Monitoring & Maintenance Annual Inspection Report	Feb 2, 2009
GM Response to USEPA Request for Information Letter	Mar 26, 2009
<u>Comments/Approvals Received from EPA / NYSDEC during the Month</u>	
- none -	

Massena Remediation Program Report Distribution List - Government Agencies

1 copy (excluding plans or reports):

Chief, New York/Caribbean Superfund Branch
Office of Regional Counsel
U.S. Environmental Protection Agency, Region II
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New York, New York 10007-1866
Attention: GM/Massena Superfund Site Attorney

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Emergency and Remedial Response Division
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Attention: Anne Kelly

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SRMT Environmental Division
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Akwesasne, NY 13655

3 copies (or 3 copies if plan or report):

New York State Department of Environmental Conservation
317 Washington Street
Watertown, New York 13601-3787
Attention: Regional Hazardous Waste Engineer – Peter Taylor, P.E.
Peter S. Ouderkirk, P.E. (1 copy)
Lincoln Fancher, Project Geologist (1 copy)

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ATTACHMENT 1

Analytical Data

Table 1
Summary of Outfall 002 Water Sampling Analytical Results
GM Powertrain Massena, 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	12760	4-Jun-07	0.051	U	0.3	1.0	< 1.00	15	1.0	5.70	50	0.179	see note 1. below	0.341	see note 1. below	
2	12792	5-Jul-07	0.05	U	0.3	1.0	1.00	15	1.00	1.20	50	< 0.0500	see note 1. below	0.280	see note 1. below	
3	-	No sample collected during August due to dry conditions.					-			-	-		-		-	
4	12854	27-Sep-07	0.0538	U	0.3	1.00	1.70	15	1.00	14.70	50	0.1910	see note 1. below	0.463	see note 1. below	
5	12879	20-Oct-07	0.05	0.066	0.3	1.0	< 1.00	15	1.00	1.30	50	0.143	see note 1. below	0.206	see note 1. below	
6	12916	15-Nov-07	0.05	U	0.3	1.0	< 1.00	15	1.00	1.50	50	< 0.0500	see note 1. below	0.532	see note 1. below	
7	-	No sample collected during December due to frozen conditions.					-			-	-		-		-	
8	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	
9	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	
10	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	
11	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	
12	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	
13	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	
14	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	
15	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	
16	-	No sample collected during September due to dry conditions.					-			-	-		-		-	
17	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	
18	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	
19	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	
20	-	No sample collected during January due to frozen conditions.					-			-	-		-		-	
21	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	
22	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	
23	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	

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
GM Powertrain Massena, 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	12736	1-May-07	0.0510	U	0.3	1.0	1.00	15	1.0	1.80	50	< 0.0500	see note 1. below	0.619	see note 1. below	
2	12761	4-Jun-07	0.0510	U	0.3	1.0	< 1.00	15	1.0	< 1.0	50	< 0.0500	see note 1. below	0.630	see note 1. below	
3	12793	5-Jul-07	0.0500	U	0.3	1.0	< 1.00	15	1.0	8.70	50	< 0.0500	see note 1. below	4.490	see note 1. below	
4	-	No sample collected during August due to dry conditions.					-			-	-		-		-	
5	12855	27-Sep-07	0.0521	U	0.3	1.00	1.00	15	1.0	3.40	50	0.1980	see note 1. below	0.616	see note 1. below	
6	12880	20-Oct-07	0.0510	0.0694	0.3	1.00	< 1.00	15	1.00	1.80	50	0.0527	see note 1. below	0.627	see note 1. below	
7	12917	06-Nov-07	0.0510	U	0.3	1.00	2.5	15	1.00	6.20	50	< 0.0500	see note 1. below	1.80	see note 1. below	
8	-	No sample collected during December due to frozen conditions.					-			-	-		-		-	
9	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	
10	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	
11	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	
12	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	
13	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	
14	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	
15	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	
16	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	
17	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	
18	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	
19	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	
20	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	
21	-	No sample collected during January due to frozen conditions.					-			-	-		-		-	
22	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	
23	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	
24	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	

Notes:

- 1). There is no effluent limit on metals for the SPDES Permit.
- 2). Analyses performed by Analytics Corporation, Inc.

Table 3
GM Powertrain
Summary of Quarterly Water Samples
NE Industrial Landfill Groundwater Sump
PCB and Phenolics Analytical Results

USEPA Method SW 846 8082 and 420.1

#	Sample ID	Sample Date	PCBs Detection Limit (ug/L)	Aroclor 1016	Aroclor 1221	Aroclor 1232	Aroclor 1242	Aroclor 1248	Aroclor 1254	Aroclor 1260	Total PCBs (ug/L)	Total Phenolics Detection Limit (ug/L)	Total Phenolics (ug/L)
1	090805-KC-001	8-Sep-05	1.6	16	U	U	U	U	U	U	16.0	5.0	U
2	122005AM-001DL	20-Dec-05	1.6	U	U	U	17.0	U	U	U	17.0	5.0	U
3	032106MP-002	21-Mar-06	1.3	U	U	U	13.0	U	U	U	13.0	5.0	U
4	061406MP-002	14-Jun-06	0.065	U	U	U	0.48	U	U	U	0.48	5.0	U
5	091206GD-002DL	12-Sep-06	3.2	UY	U	U	34 D	U	U	U	34 D	5.0	U
6	122006MP-002DL	20-Dec-06	1.6	U	U	U	19 D	U	U	U	19 D	5.0	U
7	031307MN-002DL	13-Mar-07	3.2	U	U	U	25 D	U	U	U	25 D	5.0	U
8	SNEIL-05232007-003	23-May-07	1.6	U	U	U	22	U	U	U	22	2.0	4.8
9	100207RB-002DL	2-Oct-07	3.2	U	U	U	17 D	U	U	U	17 D	5.0	U
10	121007RB-002	10-Dec-07	3.2	U	U	U	20 D	U	U	U	20 D	5.0	U
11	32708RB-002	27-Mar-08	1.6	U	U	U	16 D	U	U	U	16 D	5.0	6.7
12	SSNEIL 062508-002	25-Jun-08	6.5	U	U	U	45 D	U	U	U	45 D	5.0	6.7
13	ILF 100108-002	1-Oct-08	6.5	U	U	U	27 D	U	U	U	27 D	5.0	U
14	ILF 121008-002DL	10-Dec-08	1.6	U	U	U	26 D	U	U	U	26 D	5.0	6.6
15	ILF032509-002DL	25-Mar-09	0.065	U	U	U	14 D	U	U	U	14 D	5.0	U

Notes:

All results reported in units of micrograms per liter (ug/L) for PCBs and Phenolics; U = Non-detect.

Table 4
GM Massena Powertrain
Groundwater Sump Process Water Lagoon #2
PCB Analytical Results

USEPA Method SW 846 8082 - All results reported in ug/L.

#	Sample ID	Sample Date	Detection Limit	Aroclor 1016	Aroclor 1221	Aroclor 1232	Aroclor 1242	Aroclor 1248	Aroclor 1254	Aroclor 1260	Total PCBs
1	PW#2 2-11-04	11-Feb-04	0.05	U	U	U	2.17	U	U	U	2.17
2	PW#2 2-18-04	18-Feb-04	0.05	U	U	U	U	U	U	U	U
3	PW#2 2-24-04	24-Feb-04	0.05	U	U	U	U	U	U	U	U
4	PW#2 5-26-05	26-May-05	0.05	U	U	U	U	U	U	U	U
5	PW#2 3-29-06	29-Mar-06	0.0526	U	U	U	U	U	U	U	U
6	121007RBIL-003	10-Dec-07	0.065	U	U	U	0.16	U	U	U	0.16
7	32708RB-001	27-Mar-08	0.065	U	U	U	0.17	U	U	U	0.17
8	IAL 062508-003	25-Jun-08	0.065	U	U	U	0.18 P	U	U	U	0.18 P
9	IAL 100108-001	1-Oct-08	0.065	U	U	U	0.19 P	U	U	U	0.19 P
10	IAL 121008-001	10-Dec-08	0.065	U	U	U	0.78	U	U	U	0.78
11	IAL 032509-001	25-Mar-09	0.065	U	U	U	0.25	U	U	U	0.25

Notes:

All results reported in units of micrograms per liter (ug/L); U = Non-detect.

P = Indicates when there is greater than 25% difference for detected concentrations between the 2 GC columns. The lower of the 2 values is reported.