



August 10, 2009

U.S.EPA Region II
Emergency & Remedial Response Division
290 Broadway, 19th Floor
New York, NY 10007-1866
Attn: Ms. Anne Kelly

RE: General Motors – Massena Superfund Site, Massena, New York
EPA Orders Index No. II CERCLA-20207 and 20215 -
Monthly Progress Report No. 207 for July 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 July 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 (937) 478-8221.

Sincerely,

A handwritten signature in black ink that reads "Pamela L. Barnett". The signature is written in a cursive style with a large initial "P".

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

Monthly Progress Report No. 207 – July 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 (July 1 through July 31, 2009)

Facility Building

On July 9, 2009, GM submitted a letter report to USEPA entitled *Summary of Purpose, Scope, Methods, and Results of Building Material Sampling, GM Massena Metal Castings Plant, February – April 2009*. The letter report provides analytical results of additional media samples (concrete cores, paint chip and wipe samples) collected within the facility from February 24, 2009 to March 5, 2009 and from April 21 to April 23, 2009.

East Disposal Area

In a letter to GM dated July 2, 2009, USEPA approved the *Soil Investigation Work Plan – East Disposal Area Infield* pending GM's acceptance of USEPA's comments and modifications to the work plan. All of USEPA's suggested modifications to the Work Plan were incorporated into the revised work. On August 4, 2009, ARCADIS submitted the revised Work Plan along with responses to USEPA's comments to USEPA.

This Work Plan will delineate PCBs exceeding the 10 and 500 mg/kg PCB site cleanup goals for the East Disposal Infield area and is tentatively scheduled to begin during the week of August 17, 2009 and be completed by August 28, 2009.

Groundwater Controls

On June 10, 2009, GM submitted the revised *Interim Groundwater Characterization Sampling and Analysis Report* to USEPA along with responses to EPA's May 14, 2009 comments.

On June 24, 2009, GM collected quarterly groundwater samples from the sump northeast of the Industrial Landfill. Analytical results for the water samples are provided in Attachment 1.

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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Cove Project

On June 24, 2009, GM collected a semiannual water sample from the Turtle Creek Holding pond on the SRMT property. The analytical result for this water sample is provided in Attachment 1.

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

On June 24, 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 provided in Attachment 1.

Outfall 004 (north of the Industrial Landfill) was sampled on June 30, 2009. Outfall 002 (at the Raquette River) was not sampled during the month due to insufficient stormwater runoff at the outfall. The analytical result for this water sample is provided in Attachment 1.

Also during the month of July, a total of approximately 67,935 gallons of water (approximately 4,055 gallons from the sump northeast of the Industrial Landfill, 13,240 gallons from the containment cell areas, and 50,640 gallons from the Process Water lagoon underdrain) were transferred to GM's WWTS for treatment.

II. Analytical Data

Analytical results received during the month of July 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.
- Table 5 – Turtle Creek Holding Pond Semi-Annual Water Sample PCB Analytical Results.

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

ARCADIS has scheduled the preliminary field preparations for the *Soil Investigation Work Plan – East Disposal Area Infield* to begin during the week of August 17, 2009. The preliminary work during the first week includes:

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- mowing and clearing vegetation within the infield area,
- physically flagging and marking utilities in the EDA Infield and
- staking sample core locations in the field using a New York State licensed surveyor.

Actual Geoprobe coring will begin the week of August 24, 2009. ARCADIS will finalize this schedule upon receipt of USEPA approval.

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, 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>
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
Revised <i>Soil Investigation Work Plan – East Disposal Area Infield</i>	August 4, 2009
<u>Previously Submitted to EPA – Pending Comment or Approval</u>	
Revised Interim Groundwater Characterization Sampling And Analysis Report	June 10, 2009
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
<u>Comments/Approvals Received from EPA/NYSDEC during the Month</u>	
USEPA approval (with comments) of the <i>Soil Investigation Work Plan – East Disposal Area Infield</i>	July 2, 2009

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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
24	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
25	-	No stormwater runoff at Outfall when checked			-	-	-	-	-	-	-	-	-	-	-

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	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
2	-	No sample collected during August due to dry conditions.			-	-	-	-	-	-	-	-	-	-	-
3	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
4	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
5	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
6	-	No sample collected during December due to frozen conditions.			-	-	-	-	-	-	-	-	-	-	-
7	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
8	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
9	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
10	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
11	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
12	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
13	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
14	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
15	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
16	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
17	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
18	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
19	-	No sample collected during January due to frozen conditions.			-	-	-	-	-	-	-	-	-	-	-
20	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
21	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
22	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
23	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
24	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

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	0.65	U	U	U	14 D	U	U	U	14 D	5.0	U
16	ILF062409-001DL	24-Jun-09	0.65	U	U	U	15 D	U	U	U	15 D	5.0	U

Notes:

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

Y = AR 1016, if present is included in the value reported for AR1242

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
12	IAL 062409-001	24-Jun-09	0.065	U	U	U	0.54	U	U	U	0.54

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.

Table 5
GM Powertrain
Turtle Creek Holding Pond
Quarterly Water Sample PCB Analytical Results

USEPA Method SW 846 8082

#	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)
1	WS-122005AM-001	12/20/05	0.065	U	U	U	U	U	U	U	U
2	032106MP-001	3/21/06	0.065	U	U	U	U	U	U	U	U
3	061406MP-001	6/14/06	0.065	U	U	U	U	U	U	U	U
4	091206GD-001	9/12/06	0.065	U	U	U	U	U	U	U	U
5	122006MP-001	12/20/07	0.065	U	U	U	U	U	U	U	U
6	031307MN-001	3/13/07	0.065	U	U	U	U	U	U	U	U
7	061907RB-001	6/19/07	0.065	U	U	U	U	U	U	U	U
8	100207RB-001	10/2/07	0.065	U	U	U	U	U	U	U	U
9	121007RB-001	12/10/07	0.065	U	U	U	U	U	U	U	U
10	COVE 062508-001	6/25/08	0.065	U	U	U	U	U	U	U	U
11	COVE 100108-01	10/1/08	0.065	U	U	U	U	U	U	U	U
12	COVE 062409-003	6/24/09	0.065	U	U	U	U	U	U	U	U

Notes:

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

Massena Remediation Program Report Distribution List

1 copy (excluding plans or reports):

Chief, New York/Caribbean Superfund Branch
Office of Regional Counsel
U.S. Environmental Protection Agency, Region II
290 Broadway, 20th Floor
New York, New York 10007-1866
Attention: GM/Massena Superfund Site Attorney

2 copies (or 5 copies if plan or report):

Emergency and Remedial Response Division
U.S. Environmental Protection Agency, Region II
290 Broadway, 20th Floor
New York, New York 10007-1866
Attention: Anne Kelly

2 copies (or 3 if plan or report):

Mr. Ken Jock
Environmental Director
St. Regis Mohawk Tribe
412 State Route 37
Akwesasne, NY 13655

For Federal Express Packages:
SRMT Environmental Division
449 Frogtown Road
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. Ouder Kirk, P.E. (1 copy)
Lincoln Fancher, Project Geologist (1 copy)

1 copy:

Wendy S. Keuhner, P.E.
New York State Department of Health
Flanigan Square, Room 300
547 River Street
Troy, New York 12180

1 copy:

Jim Harrington
New York State Department of Environmental Conservation
Bureau of Watershed Compliance Programs
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