



Worldwide Facilities Group
Remediation Team

June 3, 2009

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Transmitted electronically and overnight mail

Mr. Nate Nemani
Project Manager
U.S. EPA, Region 5
Waste, Pesticide and Toxins Division
77 West Jackson Boulevard DW-8J
Chicago, Illinois
U.S.A. 60604-3590

Dear Mr. Nemani:

Re: 2008 EI Results
General Motors Powertrain
Saginaw Metal Casting Operations - Saginaw, Michigan

The annual Environmental Indicators (EI) monitoring was completed during the week of November 3, 2008 with the exception of well MW-02432, which required replacement. MW-02432 was abandoned and reinstalled as MW-02432R on November 6, 2009 and was sampled as part of the EI monitoring in December 2008.

The 2008 EI monitoring program was revised in accordance with the GM letter to U.S. EPA dated October 1, 2008. The following presents a summary of the 2008 modifications:

1. Ammonia analysis was added at monitoring wells MW-03746, MW-04250R, MW-04757, MW-03945, MW-04051, and MW-04257; and
2. For 2008 only, MW-01119 (upgradient of MW-00821) and MW-00509 (upgradient of MW-00208) for PAHs and vinyl chloride analysis, respectively.

Figure 1 presents a databox of all EI locations and data up to and including the 2008 EI results. Table 1 presents the EI monitoring program and proposed modifications, for your review and discussion.

Total ammonia was reported above the chronic screening criteria (53 $\mu\text{g/L}$ unionized ammonia or 2,120 $\mu\text{g/L}$ total ammonia) in 5 monitoring wells ranging in concentration from 2,370 $\mu\text{g/L}$ to 9,450 $\mu\text{g/L}$. All samples were reported below the acute screening criteria (420 $\mu\text{g/L}$ unionized ammonia or 16,800 $\mu\text{g/L}$ total ammonia). Sample results were consistent with previous results.

Mercury was reported above screening criteria (0.0013 $\mu\text{g/L}$) in 1 monitoring well at 0.0188 $\mu\text{g/L}$. Sample results were consistent with previous results.

Total cyanide was reported above screening criteria ($5.2 \mu\text{g/L}$) in two monitoring wells at $10 \mu\text{g/L}$. It is important to note that the Part 201 GSI criterion applies to amenable cyanide. As presented in the EI Report, the federal ambient water criteria for cyanide are $22 \mu\text{g/L}$ (criteria maximum concentration, or "CMC") and $5.2 \mu\text{g/L}$ (criteria continuous concentration, or "CCC") are based on free cyanide. By comparison, the cyanide concentration reported for the EI samples represent total cyanide, which includes all cyanides present, including low toxicity, inert species. The total cyanide concentration reported in EI groundwater samples are below CMC but above CCC; however, the detected concentrations are less than 10 times the CCC, and therefore, the discharge of groundwater containing cyanide at these concentrations are expected to be insignificant. Sample results were consistent with previous results.

Please note that the screening criteria utilized to analyze future EI data may be modified to reflect actual potential exposures (i.e. eliminate drinking water criteria). GM plans on placing a deed restriction on the property with respect to groundwater.

The results of the 2008 EI monitoring results are consistent with the data evaluated in the RCRA CA725 & CA750 Environmental Indicators Supporting Documentation dated September 17, 2003, therefore, the EIs continue to be satisfied.

Should you have any questions, please do not hesitate to call.

Yours truly,

General Motors Corporation




Cheryl R. Hiatt
Project Manager

cc: Mr. Peter Ramanaukas, U.S. EPA
Mr. George Bruchmann, MDEQ-WMD Lansing
Mr. Terry Walkington, MDEQ-WMD Bay City
Ms. Rhonda Klann, MDEQ-RRD Bay City
Dr. Lisa Williams, U.S. DOI Fish and Wildlife
Ms. Jean Caufield, GM
Mr. James Walle, GM
Mr. Moh Kumar/ Mr. Ray Ilkka, GM
Mr. Mike Tomka, CRA

MT/ev/9
Encl

"I certify that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Signature: 

Name: Cheryl R. Hiatt

Title: Project Coordinator

Date: June 3, 2009

EI MONITORING PROGRAM AND PROPOSED MODIFICATIONS
SMCO, SAGINAW, MICHIGAN

<i>IUI</i>	<i>Location</i>	<i>Parameter</i>	<i>Monitoring Purpose</i>	<i>Propose to Eliminate from EI Monitoring</i>	<i>Comments</i>
A	MW-00124	mercury	GSI	No	
A	MW-00124	vanadium	GSI	Yes	Vanadium did not exceed criteria for four consecutive rounds, therefore vanadium is proposed to be removed from future EI monitoring.
A	MW-00821	SVOCs (PAHs)	Downgradient of MW-01119	Yes	Data for MW-01119 is shown on Figure 1 and the 2008 results did not exceed criteria. In addition, results from MW-00821 have not exceeded criteria for six consecutive rounds, therefore MW-00821 and MW-01119 are proposed to be removed from future EI monitoring.
A	MW-00925	cyanide	GSI	No	
A	MW-00925	vanadium	GSI	Yes	Vanadium did not exceed criteria for four consecutive rounds, therefore vanadium is proposed to be removed from future EI monitoring.
A	MW-00925	mercury	GSI	No	
A	MW-01329	chromium, total	GSI	NA	Unable to locate. Well will be located or replaced.
A	MW-01329	chromium, hexavalent	GSI	NA	
B	MW-00309	SVOCs (PAHs)	Downgradient of SB-00408a	Yes	Data for SB-00408a is shown on Figure 1. Because MW-00309 is in close proximity to and downgradient of SB-00408a, it is reasonable that groundwater from SB-00408a has migrated to MW-00309. From 2002 to the present no impacts have been observed at MW-00309. Results from MW-00309 have not exceeded criteria for four consecutive rounds, therefore MW-00309 is proposed to be removed from future EI monitoring.
B	MW-00208	VOCs (vinyl chloride)	Downgradient of MW-00509	No	
B	MW-00208	SVOCs (PAHs)	Downgradient of SB-00408a & SB-00307c	Yes	Data for SB-00408a and SB-00307c is shown on Figure 1. Because MW-00208 is in close proximity to downgradient of SB-00408a and SB-00307c, it is reasonable that groundwater from SB-00408a and SB-00307c has migrated to MW-00208. From 2000 to present no impacts have been observed at MW-00208. Results from MW-00208 have not exceeded criteria for more than four consecutive rounds, therefore MW-00208 is proposed to be removed from future EI monitoring.
B	MW-00108	VOCs (vinyl chloride)	Downgradient of VAP-00208	Yes	Data for VAP-00208 is shown on Figure 1. Because MW-00108 is in close proximity to and downgradient of VAP-00208, it is reasonable that groundwater from VAP-00208 has migrated to MW-00108. From 2005 to present no impacts have been observed at MW-00108. Vinyl chloride results from MW-00108 have not exceeded criteria for four consecutive rounds, therefore vinyl chloride at MW-00108 is proposed to be removed from future EI monitoring.
B	MW-00108	SVOCs (PAHs)	Downgradient of SB-00307c	Yes	Data for SB-00307c is shown on Figure 1. Because MW-00108 is in close proximity to and downgradient of SB-00307c, it is reasonable that groundwater from SB-00307c has migrated to MW-00108. From 2005 to present no impacts have been observed at MW-00108. SVOC results from MW-00108 have not exceeded criteria for four consecutive rounds, therefore SVOCs at MW-00108 are proposed to be removed from future EI monitoring.
E	MW-01827	chromium, total	GSI	Yes	No GSI criteria for total chromium. Hexavalent chromium is monitored at this location, therefore total chromium at MW-01827 is proposed to be removed from future EI monitoring.
E	MW-01827	chromium, hexavalent	GSI	Yes	Hexavalent chromium did not exceed criteria for four consecutive rounds, therefore hexavalent chromium is proposed to be removed from future EI monitoring.
E	MW-01827	vanadium	GSI	Yes	Vanadium did not exceed criteria for four consecutive rounds, therefore vanadium is proposed to be removed from future EI monitoring.
E	MW-01827	mercury	GSI	No	

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<i>IU</i>	<i>Location</i>	<i>Parameter</i>	<i>Monitoring Purpose</i>	<i>Propose to Eliminate from EI Monitoring</i>	<i>Comments</i>
E	MW-02432/MW-02432R	chromium, total	GSI	Yes	No GSI criteria for total chromium. Hexavalent chromium is monitored at this location, therefore total chromium at MW-02432R will be removed from future EI monitoring.
E	MW-02432/MW-02432R	chromium, hexavalent	GSI	No	
E	MW-02432/MW-02432R	mercury	GSI	No	
E	MW-03240	chromium, total	GSI	Yes	No GSI criteria for total chromium. Hexavalent chromium is monitored at this location, therefore total chromium at MW-03240 is proposed to be removed from future EI monitoring.
E	MW-03240	chromium, hexavalent	GSI	Yes	Hexavalent chromium did not exceed criteria for four consecutive rounds, therefore hexavalent chromium is proposed to be removed from future EI monitoring.
E	MW-03240	cobalt	GSI	No	
E	MW-03240	vanadium	GSI	Yes	Vanadium did not exceed criteria for four consecutive rounds, therefore vanadium is proposed to be removed from future EI monitoring.
E	MW-03240	lead	GSI	Yes	Lead did not exceed criteria for four consecutive rounds, therefore lead is proposed to be removed from future EI monitoring.
E	MW-03240	mercury	GSI	No	
E	MW-03746	chromium, total	GSI	Yes	No GSI criteria for total chromium. Hexavalent chromium is monitored at this location, therefore total chromium at MW-03746 is proposed to be removed from future EI monitoring.
E	MW-03746	chromium, hexavalent	GSI	No	
E	MW-03746	vanadium	GSI	Yes	Vanadium did not exceed criteria for four consecutive rounds, therefore vanadium is proposed to be removed from future EI monitoring.
E	MW-03746	ammonia	GSI	No	
G	MW-04250/MW-04250R	chromium, total	GSI	Yes	No GSI criteria for total chromium. Hexavalent chromium is monitored at this location, therefore total chromium at MW-04250R is proposed to be removed from future EI monitoring.
G	MW-04250/MW-04250R	chromium, hexavalent	GSI	No	
G	MW-04250/MW-04250R	cyanide	GSI	No	
G	MW-04250/MW-04250R	mercury	GSI	No	
G	MW-04250/MW-04250R	vanadium	GSI	No	
G	MW-04250/MW-04250R	pH	GSI	No	
G	MW-04250/MW-04250R	ammonia	GSI	No	
G	MW-04757	chromium, total	GSI	Yes	No GSI criteria for total chromium. Hexavalent chromium is monitored at this location, therefore total chromium at MW-04757 is proposed to be removed from future EI monitoring.
G	MW-04757	chromium, hexavalent	GSI	No	
G	MW-04757	cyanide	GSI	No	
G	MW-04757	vanadium	GSI	Yes	Vanadium did not exceed criteria for four consecutive rounds, therefore vanadium is proposed to be removed from future EI monitoring.
G	MW-04757	ammonia	GSI	No	
G	MW-04864	chromium, total	GSI	Yes	No GSI criteria for total chromium. Hexavalent chromium is monitored at this location, therefore total chromium at MW-04864 is proposed to be removed from future EI monitoring.
G	MW-04864	chromium, hexavalent	GSI	No	
G	MW-04864	pH	GSI	No	
G	MW-04864	vanadium	GSI	Yes	Vanadium did not exceed criteria for four consecutive rounds, therefore vanadium is proposed to be removed from future EI monitoring.
G	MW-04864	ammonia	GSI	No	
Wells added in 2007 per EPA's email request dated August 8, 2007.					
G	MW-03945	chromium, total	GSI	Yes	No GSI criteria for total chromium. Hexavalent chromium is monitored at this location, therefore total chromium at MW-03945 is proposed to be removed from future EI monitoring.
G	MW-03945	chromium, hexavalent	GSI	No	
G	MW-03945	cyanide	GSI	No	
G	MW-03945	mercury	GSI	No	
G	MW-03945	vanadium	GSI	No	
G	MW-03945	pH	GSI	No	
G	MW-03945	ammonia	GSI	No	

TABLE 1
 EI MONITORING PROGRAM AND PROPOSED MODIFICATIONS
 SMCO, SAGINAW, MICHIGAN

<i>IU</i>	<i>Location</i>	<i>Parameter</i>	<i>Monitoring Purpose</i>	<i>Propose to Eliminate from EI Monitoring</i>	<i>Comments</i>
G	MW-04051	chromium, total	GSI	Yes	No GSI criteria for total chromium. Hexavalent chromium is monitored at this location, therefore total chromium at MW-04051 is proposed to be removed from future EI monitoring.
G	MW-04051	chromium, hexavalent	GSI	No	
G	MW-04051	cyanide	GSI	No	
G	MW-04051	mercury	GSI	No	
G	MW-04051	vanadium	GSI	No	
G	MW-04051	pH	GSI	No	
G	MW-04051	ammonia	GSI	No	
G	MW-04257	chromium, total	GSI	Yes	No GSI criteria for total chromium. Hexavalent chromium is monitored at this location, therefore total chromium at MW-04257 is proposed to be removed from future EI monitoring.
G	MW-04257	chromium, hexavalent	GSI	No	
G	MW-04257	cyanide	GSI	No	
G	MW-04257	vanadium	GSI	No	
G	MW-04257	pH	GSI	No	
G	MW-04257	ammonia	GSI	No	
G	MW-04765	chromium, total	GSI	Yes	No GSI criteria for total chromium. Hexavalent chromium is monitored at this location, therefore total chromium at MW-04765 is proposed to be removed from future EI monitoring.
G	MW-04765	chromium, hexavalent	GSI	No	
G	MW-04765	cyanide	GSI	No	
G	MW-04765	vanadium	GSI	No	
G	MW-04765	pH	GSI	No	
G	MW-04765	ammonia	GSI	No	

Notes:

- Table updated to include additional EI monitoring locations and parameters included as of 2008.
- Wells evaluated using most recent groundwater data compared to appropriate EI criteria.
- Since 2005 all samples for metals analyses have been collected using low flow sampling techniques and were unfiltered.
- GSI = Selected to monitor stability based on exceedances of groundwater surface water interface criteria in most recent samples.
- NA - Not applicable.