



JOHN ENGLER, Governor
DEPARTMENT OF ENVIRONMENTAL QUALITY

HOLLISTER BUILDING, PO BOX 30473, LANSING MI 48908-7973

RUSSELL J. HARDING, Director

REPLY TO:

SHIAWASSEE DISTRICT OFFICE
10650 S BENNETT DR
MORRICE MI 48857-9792

September 13, 1996

Mr. Robert Metcalf
General Motors Corporation
CLCD North
902 E. Hamilton Avenue
Flint, MI 48550-8502

SHIAWASSEE DISTRICT
COPY

Dear Mr. Metcalf:

SUBJECT: Linden Road Landfill, Flint Township, Genesee County, Michigan

The Michigan Department of Environmental Quality (MDEQ) has reviewed General Motors (GMs) August 16, 1996, response to the MDEQ's July 19, 1996 letter regarding the January 1996 Remedial Action Plan (RAP) for the above referenced site.

The following are the MDEQ's comments to your responses. If no comments to your responses are listed, the MDEQ does not have any relevant comments regarding those issues at this time.

Comment #1a: The proposal to collect five groundwater samples in the interior of the landfill using a geoprobe sampler is an acceptable approach for characterization of the groundwater within the interior of the landfill, however, all samples should be analyzed for volatile organic compounds (VOC's), semi-volatile organic compounds (SVOCs), Michigan ten metals, and polychlorinated biphenols (PCB's). If groundwater samples are unable to be collected from any of the proposed locations, the MDEQ requests that the geoprobe sampling locations be moved until five distinct locations are sampled within the interior of the landfill. If it is not possible to obtain samples using a geoprobe sampler, it may be necessary to complete this sampling using conventional drilling techniques.

In addition, the installation of two additional downgradient monitoring wells as proposed is also acceptable at this time. Since details were not provided on how these two additional wells will be installed, the MDEQ requests that the same procedures be used on these wells as was used for the previously drilled shallow wells. These additional wells should also be sampled for VOC's, SVOC's, metals, and PCB's. Please be advised that depending on the groundwater flow conditions and the analytical results from these additional wells, further investigation may be necessary.

Comment #1b: Based on the information submitted in the Weston's March 1992 *Interim Remedial Measures Evaluation and Site Investigation Report*, Weston's February 1990 *Phase I Environmental Assessment*, and a review of the aerial photos provided to Eric Van Riper of the MDEQ at your August 8, 1996 meeting, the MDEQ agrees that the extent of fill material to the north and south of the site has been adequately defined. Please be advised, however, that if any contamination or waste fill

material is discovered in the future on those properties which is related to the landfill, additional investigation and/or remediation may be necessary on those properties.

Comment #1d: The proposal to conduct an assessment of the storm drain and submit to the MDEQ a sampling plan for the collection of sediment and/or water samples is acceptable. The MDEQ requests that a sampling plan be submitted to this office by October 1, 1996, and the results of the assessment of the drain be provided in an addendum to the RAP.

Comment #2. The proposal for a "Limited Recreational" closure for the site should be addressed in an Addendum to the Remedial Action Plan (RAP). In addition, if GM intends to cleanup to a 300 foot zone along Linden Road to "Commercial Subcategory III" criteria and obtain approval to do so at this time, this must also be addressed in the revised RAP.

Comment #3: Please be advised that if GM intends to obtain closure for the 300 foot zone along Linden Road using the "Commercial Subcategory III" cleanup criteria, documentation must be provided that the governing zoning authority has changed or intends to change the zoning to the applicable designation.

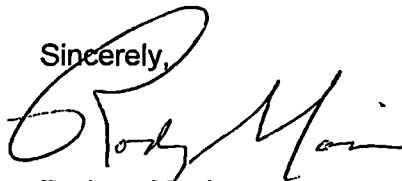
Comment #5: Since no information is yet available on the groundwater conditions within the interior of the landfill, the MDEQ requests that GM address the applicability of using the proposed soil cover upon completion of the additional investigation activities.

Comment 7b: A decision regarding the parameters for groundwater monitoring and the length of monitoring will be made upon completion of the additional investigation activities.

As discussed with Mr. Van Riper during your August 8, 1996 meeting, an addendum to the RAP which incorporates the findings of the additional investigation activities and addresses the MDEQ's comments should be submitted to the MDEQ for review.

If you have any questions, please contact Mr. Van Riper at 517-625-4621 or myself at the number listed below.

Sincerely,



Rodney Mosier
Shiawassee District Supervisor
Environmental Response Division
517-625-4615

cc: Mr. Ed Peterson, GM
Mr. John Pettit, Genesee County Health Department
Mr. Alan Howard, MDEQ
Mr. Andy Hogarth, MDEQ
Dr. Linda Larsen, MDEQ
Mr. Eric Van Riper, MDEQ