



**Worldwide Facilities Group
Remediation Team**

February 10, 2009

Mr. Nate Nemani
Project Coordinator for MID 041 793 340
RCRA Enforcement Branch (DE-9J)
U.S. EPA, Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

RE: GMC Powertrain Saginaw Metal Casting Operations, MID-041-793-340
RCRA Facility Investigation
Monthly Progress Report for the Month of January 2009

Dear Mr. Nemani:

Enclosed please find two copies of the Monthly Progress Report for the month of January 2009 for the RCRA Facility Investigation (RFI) at the GMC Powertrain Saginaw Metal Casting Operations (SMCO) Facility, MID-041-793-340, in Saginaw, Michigan.

Please call me at 313-510-4328 if you have any questions regarding this report.

Sincerely,


A handwritten signature in black ink that reads 'Cheryl R. Hiatt'.

Cheryl R. Hiatt
Project Coordinator for General Motors

cc: Mr. Peter Ramanauskas, 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. Tony Thrubis, GM
Ms. Amanda Kurzman/ Mr. Ray Ilkka, GM
Mr. Mike Tomka, CRA

Mr. Nate Nemani
February 10, 2009
Page 2

"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: February 10, 2009

GENERAL MOTORS CORPORATION

**SAGINAW METAL CASTING OPERATIONS
WASHINGTON AVENUE AND VETERANS MEMORIAL PARKWAY
SAGINAW, MICHIGAN
EPA ID #MID041793340**

RCRA FACILITY INVESTIGATION

MONTHLY PROGRESS REPORT

February 9, 2009

**CONESTOGA-ROVERS & ASSOCIATES
8615 WEST BRYN MAWR AVENUE
CHICAGO, ILLINOIS 60631
PHONE: (773) 380-9933
FAX NO.: (773) 380-6421**

CERTIFICATION STATEMENT

"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."

SEE ATTACHED CERTIFICATION LETTER

Cheryl R. Hiatt
GM Remediation Project Coordinator

Date

General Motors Corporation
Worldwide Facilities Group
Remediation Team

DISTRIBUTION LIST

U.S. EPA RCRA Enforcement Branch, Project Coordinator	Nate Nemani
MDEQ Waste Management Division, Chief	George Bruchmann
MDEQ Waste Management Division, District Supervisor	Terry Walkington
MDEQ Remediation and Redevelopment	Rhonda Klann
USDOJ, East Lansing Field Office	Dr. Lisa Williams
GM Remediation Project Coordinator	Cheryl R. Hiatt
GM SMC Environmental Dept.	Ray Ilkka
GM Legal Counsel	Jim Walle, Esq.
CRA Project Manager	William K. Steinmann, CPG
CRA Document Coordinator	Rosanne Cadetto
Exponent	Pieter Booth
ENVIRON International Corporation, Inc.	Stephen Song, Ph.D.

LIST OF ATTACHMENTS

Attachment A – City of Saginaw Consent Order – December 2008 Monthly Report, GM Saginaw Metal Casting Operations, Saginaw, Michigan

Attachment B – Annual Report for Offsite Reuse of Spent Foundry Sand, GM Powertrain - Saginaw Metal Casting Operations, Saginaw, Michigan

1.0 INTRODUCTION

This Monthly Progress Report is submitted in accordance with the RCRA Section 3008(h) Unilateral Administrative Order (U.S. EPA Docket No. V-W-003-95) issued to General Motors Corporation, July 9, 1995 (effective August 9, 1995).

The next monthly progress report will be submitted on or before March 10, 2009.

2.0 DESCRIPTION AND ESTIMATE OF THE PERCENTAGE OF THE RFI COMPLETED

Each of the submissions identified in the Order has been submitted on or before its due date. The following is a list of those submissions and the date submitted.

- Designation of GM's Project Manager and Project Consultant - July 7, 1995.
- Description of Current Conditions (DOCC) Report (Task I) - August 22, 1995.
- Notification of Laboratories to be used for the RFI - September 6, 1995.
- Supplemental data submission package - October 6, 1995.
- Pre-Investigation Evaluation of Corrective Measure Technologies (Task II) - October 6, 1995.
- RFI Workplan (Task III) for Phase 1 - November 3, 1995.
- Addendum to the DOCC - October 10, 1997. Technical Memorandum: Saginaw River Sediment Chemistry in the Vicinity of the Saginaw Metals Casting Operations - March 13, 1998, Revised: December 17, 1998.
- RFI Workplan (Task III) for Phase IA - Revision 2, June 9, 1998 (Approved June 30, 1998).
- Addendum to the June 1998 (Revision 2) Phase 1A RCRA Facility Investigation Workplan, Saginaw Metal Casting Operations, Saginaw, Michigan, December 9, 1998.
- Addendum to the Description of Current Conditions Report, Area West of 6th Street, January 14, 1999.
- Phase 1A RCRA Facility Investigation (RFI) Report and Phase 1B RFI Workplan, June 7, 1999 and April 19, 2000.
- Amendment to the June 1999 Phase 1A RCRA Facility Investigation (RFI) Report and Phase 1B RFI Workplan, June 4, 2001.
- RFI Phase 1B Amendment No. 2 to the April 19, 2000 Phase 1A RFI Report and Phase 1B RFI Work Plan, August 21, 2002.
- Environmental Indicators Report, September 17, 2003.
- RFI Phase 1C Investigation Work Plan, December 9, 2004.
- Interim Measures Work Plan for PCB-Impacted Areas, December 9, 2004.

- Interim Measures Work Plan for LNAPL-Impacted Soil in IU B, December 9, 2004.
- Amendment to the Interim Measures Work Plan for PCB-Impacted Areas, January 21, 2006.
- Amendment to Interim Measures Work Plan for LNAPL-Impacted Soil in IU B, January 21, 2006.
- Interim Measures Completion Report for PCB-Impacted Soil, August 9, 2006.
- RCRA Facility Investigation – Phase 1C Report, January 5, 2007.
- RCRA Facility Investigation – Phase 1C Report – Revised, March 9, 2007.

GM currently estimates that all of the RFI field work has been completed.

3.0 SUMMARIES OF ALL FINDINGS

GM has continued sewer investigation activities as part of a Consent Order with the City of Saginaw. The Consent Order currently requires the submittal of monthly reports detailing the sampling of Outfall 008 and any cleaning activities that took place during the previous month. The Monthly Report (December 1 – December 31, 2008) is presented in Attachment A.

No LNAPL excavation as described in the original IM work plan will be completed at this time as the monitoring of MW-00305, MW-00304, MW-00303, MW-00304A, MW-00304B and MW-00305A reported no measurable LNAPL on January 5, 2009. GM believes that agreement has been reached with U.S. EPA and MDEQ to no longer require the excavation in the LNAPL area and is anticipating written confirmation that this issue has been resolved and monthly monitoring is no longer required.

U.S. EPA and GM participated in a monthly project status call on January 22, 2009.

4.0 SUMMARIES OF ALL CHANGES MADE IN THE RFI DURING THE REPORTING PERIOD

No changes occurred during the reporting period.

5.0 SUMMARIES OF ALL CONTACTS WITH REPRESENTATIVES OF LOCAL COMMUNITY, PUBLIC INTEREST GROUPS OR STATE GOVERNMENT DURING THE REPORTING PERIOD

GM has continued monthly sampling of sewer outfall 008 as part of the Consent Order with the City of Saginaw regarding compliance of the wastewater discharge at Outfall 008. GM submitted the monthly report (December 1 – December 31, 2008) (Attachment A) to the City in accordance with the Consent Order.

On January 12, 2009, GM submitted the annual report for offsite reuse of spent foundry sand to the MDEQ (Attachment B).

**6.0 SUMMARIES OF ALL PROBLEMS OR POTENTIAL PROBLEMS
ENCOUNTERED DURING THE REPORTING PERIOD**

Excavation of soil in the area of LNAPL has not been completed and GM has requested that the original IM work plan be withdrawn. Based on discussions with U.S. EPA on November 24, 2008 and January 22, 2009, GM believes that U.S. EPA will be issuing a letter accepting GM's withdrawal request.

7.0 ACTIONS BEING TAKEN TO RECTIFY PROBLEMS

GM submitted a request to withdraw the LNAPL IM Work Plan and U.S. EPA is reviewing the request. Based on discussions with U.S. EPA on November 24, 2008 and January 22, 2009, GM believes that U.S. EPA will be issuing a letter accepting GM's withdrawal request.

8.0 CHANGES IN PERSONNEL DURING THE REPORTING PERIOD

No changes in personnel occurred during the reporting period.

9.0 PROJECTED WORK FOR THE NEXT REPORTING PERIOD

The next monthly progress report will be completed by March 10, 2009.

A monthly telephone update between U.S. EPA and GM is scheduled for February 23, 2009.

GM will submit an IM work plan to address pH impacted soil in IU I.

GM will submit the EI monitoring results.

**10.0 COPIES OF DAILY REPORTS, INSPECTION REPORTS,
LABORATORY/MONITORING DATA**

Attachment A – City of Saginaw Consent Order – December 2008 Monthly Report, GM Saginaw Metal Casting Operations, Saginaw, Michigan

Attachment B – Annual Report for Offsite Reuse of Spent Foundry Sand, GM Powertrain - Saginaw Metal Casting Operations, Saginaw, Michigan

ATTACHMENT A

MONTHLY REPORT

TO: Jason Casteel, City of Saginaw REF. NO.: GM008 -12-2008

FROM: Renee Mietz, GMPT SMCO DATE: January 14, 2009

C.C.: Jeanette Best, City of Saginaw
Amanda Kurzman, GM Cheryl Hiatt, GM
Anthony Thrubis, GM Ray Ilkka, GM
Dave Kwasny, GM Mike Tomka, CRA

RE: **March 24, 2006 Consent Order revised by Addendum dated December 10, 2007:
Monthly Report - Sewer Investigation - December 1 to December 31, 2008
GM Saginaw Metal Casting Operations, Saginaw, Michigan**

This Monthly Report presents a summary of work completed from December 1 to December 31, 2008.

1. **Summary of Activities Completed During December 1 to December 31, 2008 Under Significant Industrial User Permit #2004-11**
 - No additional activities were completed during this reporting period.
2. **Summary of Activities Completed During December 1 to December 31, 2008 (per March 24, 2006 Consent Order, Section 8.a)**
 - Sampling of Outfall on December 9, 2008.
3. **Summary of Activities Completed During December 1 to December 31, 2008 (per March 24, 2006 Consent Order, Section 8.b)**
 - Cleaned out sediment in Sump prior to Outfall 008 on December 2, 2008.
 - Disposal of Sediment removal water on October 31, 2008.
4. **Summary of Activities Scheduled for the next Month (January, 2009)**
 - Monthly sampling at Outfall 008 for PCBs.
 - Sediment removal at Outfall 008.
5. **Other Information**
 - Due reduced operations at the facility as well as a low amount of sediment during the winter months the sediment is being evacuated 1 time per month. When sediment volumes increase we will resume bi-monthly sediment evacuations as necessary.

TABLE 1

ANALYTICAL DATA SUMMARY
 PCB 24-HOUR COMPOSITE WATER SAMPLING
 AT OUTFALL 008
 DECEMBER 2008
 GMPT - SAGINAW METAL CASTING OPERATIONS
 SAGINAW, MICHIGAN

<i>Sample Date:</i>	<i>Daily Outfall 008 Flow Gal</i>	<i>Aroclor-1016 (PCB-1016) µg/L</i>	<i>Aroclor-1016 (PCB-1028) µg/L</i>	<i>Aroclor-1232 (PCB-1232) µg/L</i>	<i>Aroclor-1242 (PCB-1242) µg/L</i>	<i>Aroclor-1248 (PCB-1248) µg/L</i>	<i>Aroclor-1254 (PCB-1254) µg/L</i>	<i>Aroclor-1260 (PCB-1260) µg/L</i>	<i>Total PCBs µg/L</i>
12/19/2008		ND (0.1)	ND (0.1)	ND (0.1)	ND (0.1)	ND (0.1)	ND (0.1)	ND (0.1)	ND (0.1)

*No Flow Recorded due to malfunctioning flow meter

TABLE 2

ANALYTICAL DATA SUMMARY
 PCB GRAB SPLIT SAMPLE
 SEDIMENT EVACUATION WATER FROM OUTFALL 008
 DECEMBER 2008
 GMPT - SAGINAW METAL CASTING OPERATIONS
 SAGINAW, MICHIGAN

<i>Sample Date:</i>	<i>Sample Container Number</i>	<i>Aroclor-1016 (PCB-1016) µg/L</i>	<i>Aroclor-1016 (PCB-1028) µg/L</i>	<i>Aroclor-1232 (PCB-1232) µg/L</i>	<i>Aroclor-1242 (PCB-1242) µg/L</i>	<i>Aroclor-1248 (PCB-1248) µg/L</i>	<i>Aroclor-1254 (PCB-1254) µg/L</i>	<i>Aroclor-1260 (PCB-1260) µg/L</i>	<i>Total PCBs µg/L</i>
Samples Taken									

Samples Taken

Discharged sediment cleanout totes to GM Oil & Water Separater

ATTACHMENT B



Mr. Duane Roskoskey - MDEQ Lansing Office
Solid Waste Management Section
Waste and Hazardous Materials Division
Constitution Hall
525 W. Allegan St.
P.O. Box 30421
Lansing, Michigan 48909

January 12, 2009

Re: Annual Report for offsite reuse of Spent Foundry Sand
GM Powertrain - Saginaw Metal Casting Operations (SMCO)
Saginaw, Michigan

Dear Mr. Roskoskey:

General Motors Powertrain - Saginaw Metal Casting Operations is providing the following information for the reuse of spent foundry sand for the year of 2008.

The specific reuse projects were:

- 1) Daily cover and construction materials in Type II Landfills.
 - A) Venice Park Recycling & Disposal, Lennon, Michigan.
3,000 tons of Core Butts/Aluminum Green Sand/Lost Foam Sand
 - B) Waste Management, Birch Run, Michigan.
16,400 tons of Core Butts/Aluminum Green Sand/Lost Foam Sand
- 2) Additions to asphalt
 - A) Saginaw Asphalt/International Materials
31,500 tons of Spent Precision Sand

The total offsite usage of spent sand from SMCO for the year of 2008 was as follows:

<u>Material</u>	<u>Offsite Usage</u> (tons)
-----------------	--------------------------------

Mr. Duane Roskoskey

1/29/2009

Page 2

- Core Butts/Aluminum Green Sand/Lost Foam Sand	19,400
-Spent Precision Sand	31,500
Total for one half year	50,900 tons

The total offsite usage of spent sand from SMCO for 1995 through 2008 is as follows:

<u>Material</u>	<u>Offsite Usage</u> (tons)
- Washed Classified Sand	1,561,360
- Core Butts	1,482,780
- Metals Reclamation Sand	2,035,250
- Aluminum Green Sand	20,400
- Spent Precision Sand	31,500
- Quenched Slag	242,700
Total for fourteen years	5,373,990 tons

Please call me at (989) 757-1473 if you have any questions.

Sincerely,

Raymond A. Ilkka,
General Supervisor
Environmental Services