



**CONESTOGA-ROVERS
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MEMORANDUM

TO: Scott Adamowski REF. NO.: 17358_23
FROM: Michael Reece/55/Det. DATE: June 3, 2004
C.C.: Ken Richards
RE: **Review of GMPT Files for Historical PCB Analytical Data**

The purpose of this memo is to summarize the review of GMPT-Willow Run files related to historical PCB analytical data for wastewater discharges, storm water discharges, sludge disposal, and reclaimed oil.

Personnel Interviewed and Files Reviewed

The following GMPT facility personnel were interviewed and the following files were reviewed:

- Debby Rasche
 - Semi-Annual Wastewater Reports (which included wastewater and storm water) from 1978 to 2003 for Discharge 002 and 003. Discharge 002 is effluent from GMPT's industrial waste treatment plant (IWTP) and sanitary wastewater discharged to Ypsilanti Community Utilities Authority (YCUA). Discharge 003 is storm water and National Pollutant Discharge Elimination System (NPDES) discharge.
- Gary Dolberry
 - Waste characterization analytical data from 1989 to 2004 for waste oil, grinding swarf (which includes sludge from the IWTP grit separator). Analytical information for project-related wastes was also reviewed (demolition, concrete removal, underground transformer substations decommissioning, etc.), however these wastes were not associated with the Light Non-Aqueous Phase Liquid (LNAPL or free product) treatment system.

File Review Results

Wastewater

PCBs were not detected in the Semi-Annual Wastewater Reports for 2003 – 2002, 2000, 1999, 1997 – 1988, and 1986 – 1981.

Sludge was sampled from a Chip House storm sewer project during June 1995. PCB-1260 was detected in the sludge at 3.98 ppm. It appears that the PCB detected in the sludge was not associated with the LNAPL treatment system.

On March 26, 1976, PCB-1232 was detected in samples were collected from the clarifier, East Basin and West Basin. The concentrations were 0.044 ppm, 0.0003 ppm, and 0.0002 ppm, respectively. The following are data gaps in the Semi-Annual Wastewater Report information:

- No information was in the 2001 file for Discharge 002 and 003.
- No sampling was done in 1998 due a strike and cut backs at the plant and due to permits being renegotiated with YCUA and NPDES;
- No data was available for the 2nd sampling round in 1987;
- No data was available for the 2nd sampling round in 1985;
- No results were listed for PCB's for 1984 and 1983; and
- PCBs were not analyzed from 1978 to 1980.

Wastes

Various sampling from 1989 to 2004 indicated that PCB's were not detected in grinding swarf and waste oil. A January 2001 analytical result for a sample collected from the grit separator indicated that PCB's were non-detect. A June 2001 analytical result for a sample collected from the basement under Bay F-69 indicated that PCB's were non-detect.

As previous mentioned, analytical information for project-related wastes was also reviewed (demolition, concrete removal, underground transformer substations decommissioning, etc.) and indicated Aroclor-1260 and 1254 were detected. The analytical results ranged from 2,000 ppb to 90 ppm. It appears these wastes were not associated with the Light Non-Aqueous Phase Liquid (LNAPL or free product) treatment system.