



**CONESTOGA-ROVERS
& ASSOCIATES**

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November 18, 2014

Reference No. 017360

Mr. Peter Ramanauskas
U.S. Environmental Protection Agency – Region V
77 West Jackson Boulevard LU-9J
Chicago, Illinois 60604-3507

Dear Mr. Ramanauskas:

Re: Addendum to Risk-Based Polychlorinated Biphenyl (PCB) Cleanup Plan
Former General Motors (GM) Grand Rapids Metal Plant Property
300 36th Street SW, Wyoming, Kent County, Michigan

Conestoga-Rovers & Associates, Inc. (CRA), on behalf of Revitalizing Auto Communities Environmental Response (RACER) Trust, submitted a Risk-Based PCB Cleanup Plan (Plan) to the United States Environmental Protection Agency (U.S. EPA) and the Michigan Department of Environmental Quality (MDEQ) on August 26, 2014 for a coordinated review and approval. Based on discussions with Ms. Darlene Stringer of the MDEQ and Ms. Jean Greensley of the U.S. EPA, several comments were generated as a result of each agency's review of the Plan. These comments are addressed below.

Self-Implementing Cleanup

Based on discussions with the U.S. EPA on November 5, 2014, the Plan originally submitted for risk-based approval can be completed utilizing the self-implementing cleanup procedures under 40 Code of Federal Regulations (CFR) 761.61(a). This letter serves as RACER's intent and notification to self-implement the cleanup originally proposed in the previously submitted Plan. Post-cleanup verification sampling will follow guidelines established under Subpart O and a cleanup completion summary report will be submitted within 60 days after completion of the proposed cleanup.

Porous Surface Material Sampling Plan

Based on the discussions with U.S. EPA, concrete and asphalt surface materials currently covering the two proposed excavation areas of PCB-containing soil require sampling for characterization of the materials for disposal. Porous surface material samples will be collected from each area in accordance with self-implementing cleanup procedures presented in 40 CFR 761.61(a) and U.S. EPA's *Standard Operating Procedure for Sampling Porous Surfaces for Polychlorinated Biphenyls* (U.S. EPA, 2011).

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Porous surface material sample locations in each area will be selected based on a 3-meter grid placed over the proposed area of surface material removal. A minimum of three samples of each type of porous surface material will be collected from each area pursuant to 40 CFR 761.283(a). Samples collected from each type of material will be composited (to the extent possible) in accordance with 40 CFR 761.286. The proposed grid placement and composite sample locations are presented in Figures 1 and 2 for the former Tar House and Bulk Unload Areas, respectively. Samples will be collected from the upper 3 inches of porous material. Pulverized porous material samples will be collected utilizing a rotary impact hammer drill, placed in laboratory-cleaned sample jars, placed on ice, and submitted to the analytical laboratory under standard Chain-of-Custody (COC) protocol.

Former Tar House

The surface material in the proposed area of excavation in the former Tar House Area is primarily composed of concrete, with a portion covered by asphalt. Based on the size of the proposed excavation area, three composite samples of asphalt and three composite samples of concrete will be collected for laboratory analysis for PCBs. Figure 1 presents the proposed sample locations.

Bulk Unload Area

The surface material in the proposed area of excavation in the Bulk Unload Area is composed of asphalt. Based on the size of the proposed area of excavation, three composite samples of asphalt will be collected for laboratory analysis for PCBs. Figure 2 presents the proposed sample locations.

Disposal Facility Notification

Pursuant to the requirements under 40 CFR 761.61(a), RACER will provide written notice to the disposal facility, including the estimated quantity to be shipped and highest concentrations of PCBs at least 15 days prior to the first shipment of bulk PCB remediation waste to the off-Site disposal facility.



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Post-Remediation Restrictions

The Plan also specifies deed restrictions that will be placed on the Site consistent with 40 CFR 761.61(a)(8). The deed restrictions will identify use restrictions, occupancy designations, where caps are present on the property, maintenance requirements and the remaining PCB concentrations. The proposed cleanup level for on-Site contamination is 10 parts per million (ppm), which allows for the areas to be utilized in a manner in the future that would meet the definition of a Low Occupancy Area under 40 CFR 761 without further conditions. A 10 ppm cleanup level would also allow use of the areas in a manner in the future that, with the addition of a cap, could meet the requirements for a High Occupancy Area.

In response to discussions with U.S. EPA, additional information will be included in the proposed deed restriction requiring current and future property owners to notify the U.S. EPA if a specific area restricted as a Low Occupancy Area is to be designated as a High Occupancy Area after the owner's construction of a cap meeting the requirements specified in 40 CFR 761.61(a)(7). The deed restriction will also specify the land owner's responsibility to follow the monitoring and maintenance requirements specified in 40 CFR 761.61(a)(8) after construction of an approved cap.

Bulk Unload Area – Extent of Excavation

Based on the coordinated review of the Plan, a discrepancy was found between the text of the Plan and Figure 6 identifying the extent of excavation to occur in the Bulk Unload Area. Section 4.4.1.2 of the Plan incorrectly states that the southern extent of the excavation is in the approximate location of SB212-12. The correct location of the southern extent of excavation is in approximate location of SB149-11. Figure 6 correctly presents the proposed extent of excavation.

Estimated Schedule

The porous material sampling is expected to be completed in December 2014. The excavation scope of work of both areas described in the submitted Plan is anticipated to be completed during the 2015 construction season. Required notifications under 40 CFR 761.61(a) will be completed prior to commencement of planned remediation activities.



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Please contact the undersigned at (269) 685-5181 should you have any questions regarding this Summary.

Yours truly,

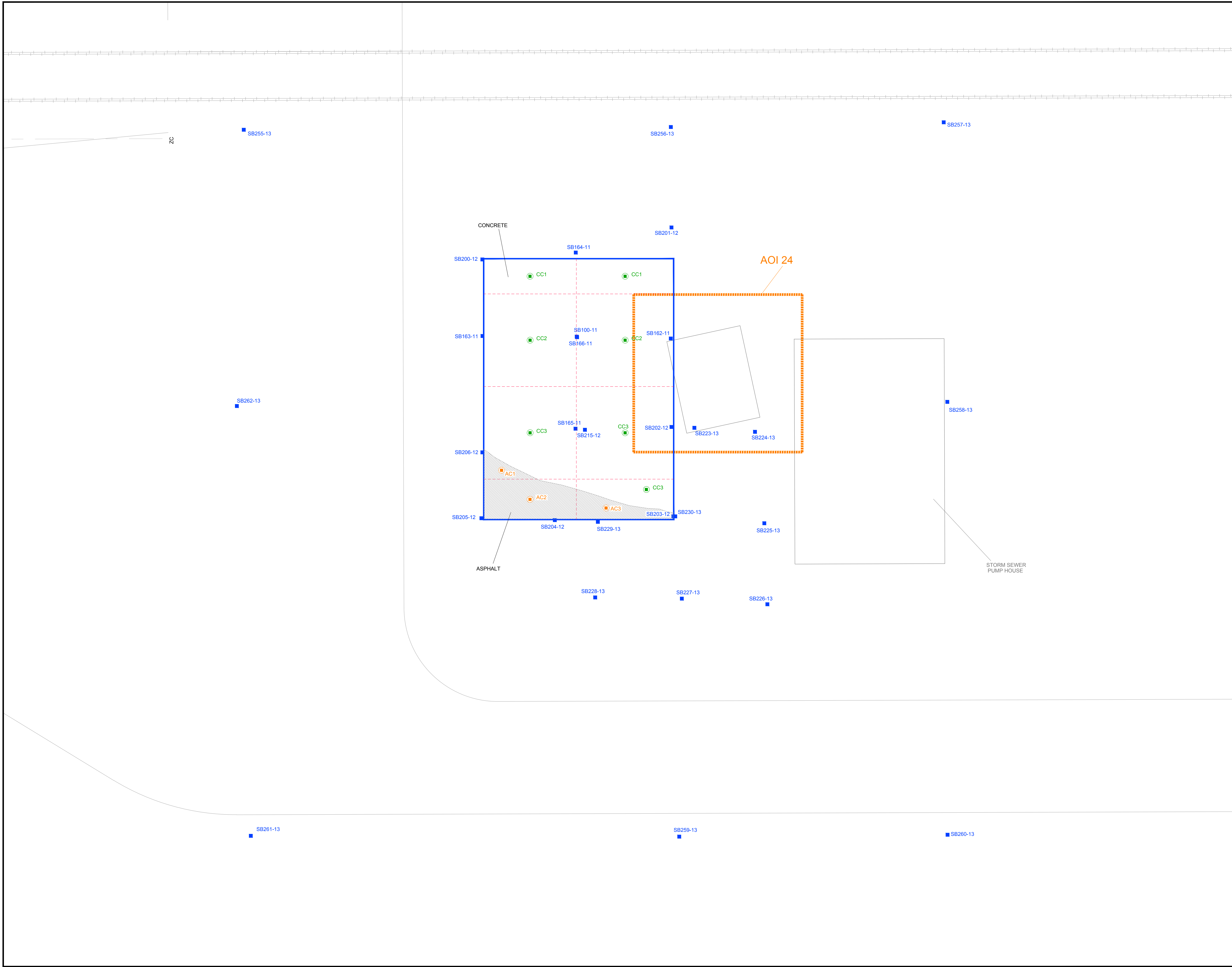
CONESTOGA-ROVERS & ASSOCIATES

Jennifer L. Quigley, P.E.

EB/1/jlc/Plw.

Encl.

cc: Jean Greensley, U.S. EPA, Region 5
Darlene Stringer, MDEQ
Deborah MacKenzie-Taylor, MDEQ
Adam London, Kent County Health Department
David Favero, RACER Trust



No	Revision	Date	Initial

LEGEND

- SB261-13 SOIL BORING LOCATIONS
- APPROXIMATE SITE BOUNDARY
- - - FENCE
- - - RAILROAD
- - - APPROXIMATE AOI
- APPROXIMATE EXCAVATION AREA
- - - 3-METER GRID FOR SAMPLE SELECTION
- CONCRETE CORE COMPOSITE SAMPLE LOCATION
- ASPHALT CORE SAMPLE LOCATION

KEY MAP

SCALE VERIFICATION

THIS BAR MEASURES 1" ON ORIGINAL. ADJUST SCALE ACCORDINGLY.

Approved		
DRAWING STATUS		
Status	Date	Initial

PROPOSED POROUS SURFACE
SAMPLE LOCATIONS

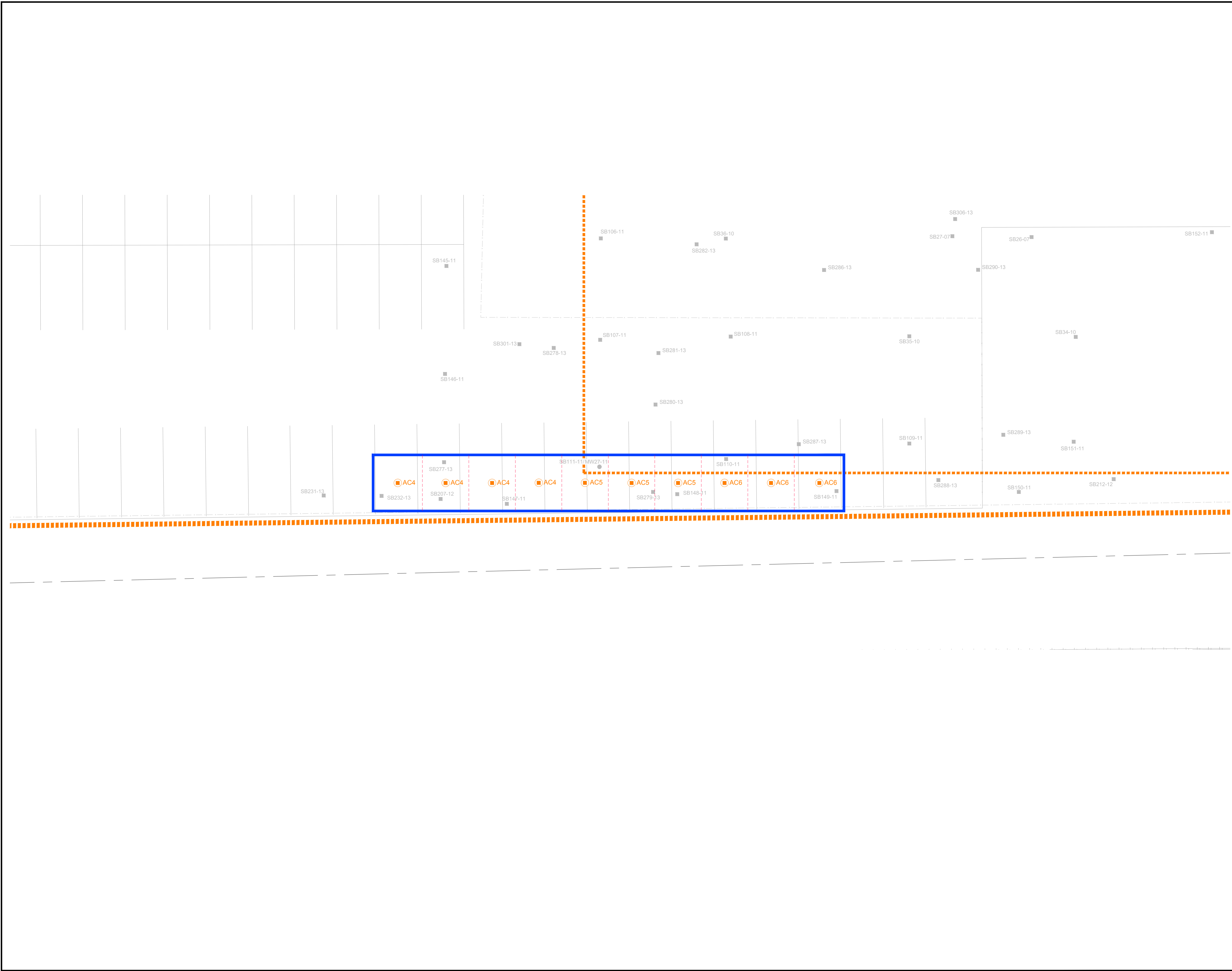
FORMER TAR HOUSE

FORMER GRAND RAPIDS METAL PLANT
WYOMING, MICHIGAN

CONESTOGA-ROVERS & ASSOCIATES

Source Reference:

Project Manager: J. Q.	Reviewed By: E. B.	Date: NOVEMBER 2014
Scale: 1:5	Project N°: 017360-T12	Report N°: RAMA001
		Drawing N°: Figure 1



No	Revision	Date	Initial

LEGEND

- SB295-13 SOIL BORING LOCATIONS
- - - APPROXIMATE SITE BOUNDARY
- - - FENCE
- - - RAILROAD
- - - APPROXIMATE AOI
- APPROXIMATE EXCAVATION AREA
- - - 3-METER GRID FOR SAMPLE SELECTION
- ASPHALT CORE COMPOSITE SAMPLE LOCATION

KEY MAP

SCALE VERIFICATION

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Approved		
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Status	Date	Initial

PROPOSED POROUS SURFACE
SAMPLE LOCATIONS

BULK UNLOAD AREA

FORMER GRAND RAPIDS METAL PLANT
WYOMING, MICHIGAN

Source Reference:

Project Manager: J.Q.	Reviewed By: E.B.	Date: NOVEMBER 2014
Scale: 1:15	Project N°: 017360-T12	Report N°: RAMA001
		Drawing N°: Figure 2