

PHASE I ENVIRONMENTAL SITE ASSESSMENT

AC DELCO SYSTEMS
200 ACRE PARCEL
FLINT EAST

Flint, Michigan

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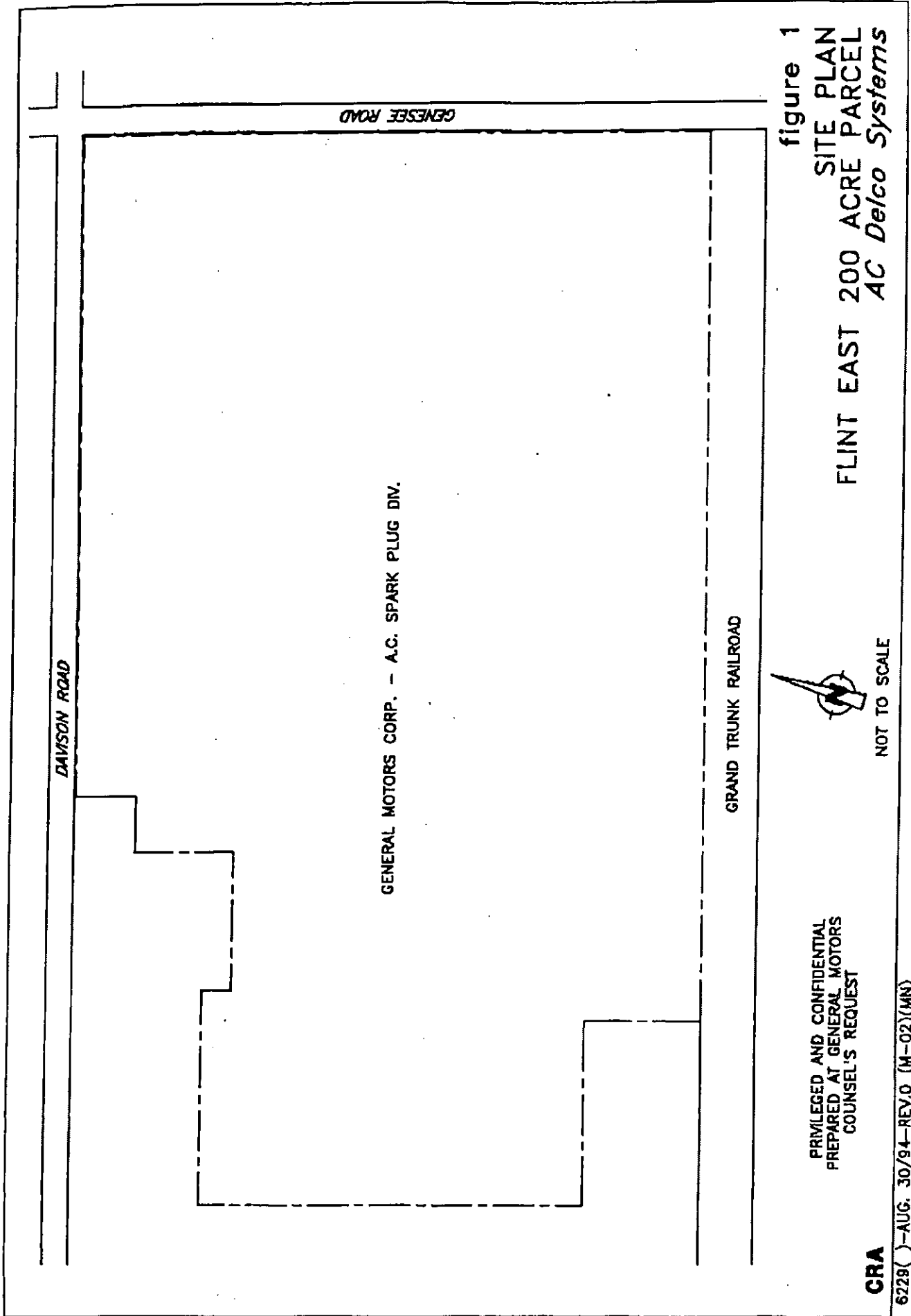
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CRA

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The Site currently is not used by AC for anything except the disposal of clean fill according to AC personnel. The Site previously operated as a permitted landfill in the 1970's for the disposal of foundry sand generated at the Buick Motor Division, Flint plant. The Site has also been used for the land disposal of construction debris, scrap, yard waste and miscellaneous solid waste.

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2.0 SCOPE OF WORK

The following Scope of Work was completed by CRA in developing the Phase I ESA:

Site Visit

- Documentation of visual observations of current Site conditions, land use and neighboring properties;
- Review of available records on Site (e.g., files, drawings, audits, etc.);
- Interviews with AC Delco Systems personnel; and
- Documentation of Site activities.

Historical Review

- Interviews with local personnel;
- Determination of facility construction/renovation dates; and
- Documentation of previous facility uses based on discussions with facility employees.

Review Agency Files and Corporate Files

- Review of Site files relating to various environmental programs (e.g., RCRA, TSCA, NPDES, Spill Plans, Air Emissions);
- Review of published topographic and geologic maps; and
- Review of Federal and State environmental databases and lists.

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Information used in completing the Phase I ESA was primarily obtained from discussions with facility staff, visual Site observations made by CRA, and a review of applicable facility files and documents. Based on information obtained by CRA, a summary of potential areas of environmental concern (PAOC) was prepared. PAOCs are defined as areas where a documented release of chemicals into the environment may have occurred at levels which may adversely impact public health or the environment. For the purposes of the Phase I ESA, documented evidence of a PAOC consisted of: existing Site monitoring data, historic releases identified by facility personnel, visual evidence of releases observed by CRA, or historic releases documented in facility files or regulatory agency files.

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**3.0 ENVIRONMENTAL DATABASES SEARCH
AND HISTORICAL RECORDS REVIEW**

3.1 ENVIRONMENTAL DATABASES SEARCH

CRA contracted Environmental Risk Information and Imaging Services (ERIIS) to conduct a search of federal and state environmental databases. Based on the address of the facility, the database searches were completed to assist in the identification of conditions at the subject Site or within a radius specified in ASTM Standard E1527-93. The following databases were searched with the findings as noted. A copy of the database search is presented in Appendix A.

3.1.1 Federal Databases

1. National Priority List (NPL) - The NPL, also known as the Superfund List, is a United States Environmental Protection Agency (USEPA) listing of uncontrolled or abandoned hazardous waste sites targeted for remedial action under the Superfund Act. The list is primarily based on a score that the site receives from the USEPA's Hazardous Ranking System.

FINDING: The Site was not reported to be on the NPL. No sites were reported to be on the NPL within a one mile radius of the Site.

2. Comprehensive Environmental Response, Compensation and Liability Information System (CERCLIS) - The CERCLIS lists uncontrolled or abandoned hazardous waste sites under USEPA investigation for the release or threatened release of hazardous substances. Once a site is placed on CERCLIS, it may be subjected to several levels of review and evaluation and may ultimately be placed on the NPL.

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FINDING: The Site is considered part of the AC Delco Averill Avenue facility located at 4134 Davison Road, which is one of two CERCLIS sites within a one-half mile radius of the Site. A Preliminary Assessment/Visual Site Inspection (PA/VSI) was conducted at the AC Delco Averill Avenue facility in 1992, by PRC Environmental Management Inc., however no action priority has been assigned. The other site is the Action Auto #2 site located approximately one-quarter mile west of the Site. A Preliminary Assessment was completed at the Action Auto #2 site in June 1987, with no further action required.

3. **Toxic Release Inventory (TRI)** - The TRI Report contains information on the industrial release and/or transfer of toxic chemicals as reportable under Title III of the Superfund Amendments and Reauthorization Act of 1986 (Sara Title III).

FINDING: The Site was not reported to be listed in the TRI Report. No sites within a one mile radius of the Site were reported to be listed in the TRI Report.

4. **Resource Conservation and Recovery Information System - Treatment, Storage and Disposal Facilities (RCRIS-TS)** - The RCRIS-TS Report contains information regarding those facilities that either treat, store or dispose of hazardous waste.

FINDING: The Site is considered part of the AC Delco Averill Avenue facility located at 4134 Davison Road, which is one of two RCRIS-TS sites located within the minimum search distance of one mile. The AC Delco Averill Avenue facility and the AC Spark Plug Division Engineering site located at 1601 North Averill Avenue were both listed for a variety of USEPA waste codes.

5. **Resource Conservation and Recovery Information System - Large Quantity Generator (RCRIS-LG)** - The RCRIS-LG Report contains information regarding facilities that either generate more than 1,000 kilograms (kg) of hazardous waste per month or meet other

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applicable requirements of the Resource Conservation and Recovery Act (RCRA).

FINDING: The Site was not reported to be listed in the RCRIS-LG Report. One site within a one mile radius of the Site was reported to be listed in the RCRIS-LG Report. The site is the Davison Road Laundry and Dry Cleaning located at 3849 Davison Road, and is not adjacent to the Site.

6. Resource Conservation and Recovery Information System - Small Quantity Generators (RCRIS-SQG) - The RCRIS-SG Report contains information regarding those facilities that either generate between 100 kg and 1,000 kg of hazardous waste per month or meet other applicable requirements of RCRA.

FINDING: The Site was not reported to be listed in the RCRIS-SQG Report. Five other sites within a one-mile radius of the Site were reported to be listed in the RCRIS-SQG Report. Moss Bob Volkswagen, Inc. located across Davison Road at 4499 Davison Road; Burton Auto Collision, Inc. located approximately one-quarter mile northwest of the property at 4105 Davison Road; DC Electric Motor Repair, Inc. located approximately one-quarter mile northwest at 4102 Davison Road; Clark Oil Station No. 1605 located approximately one-half mile northwest of the property at 3802 Davison Road; and ANR Freight Systems, Inc. located approximately one-half mile southwest of the Site at 3318 Robert Longway Blvd. Three of the locations are located adjacent to the Site.

7. Civil Enforcement Docket - The Docket is the USEPA's system for tracking civil judicial cases filed on the Agency's behalf by the Department of Justice. The Docket contains information on civil cases filed from 1972 to present.

FINDING: The Site was not reported to be listed in the Docket. One site within a one-mile radius of the Site was reported to be listed in the Docket. The listed site was Certified Abatement Services, located

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three-quarters of a mile southwest of the Site, for an air emission violation.

8. Emergency Response Notification System (ERNS) - ERNS is a national computer database system that is used to store information on the sudden and/or accidental release of hazardous substances and petroleum into the environment. The ERNS reporting system contains preliminary information on specific releases including the spill location, the substance released and the responsible party.

FINDING: The Site was not reported to be listed in the ERNS. No sites within a one-mile radius of the Site were reported to be listed in the ERNS.

9. Facility Index System (FINDS) - The FINDS Report is a computerized inventory of all facilities that are regulated or tracked by the USEPA. These facilities are assigned an identification number that serves as a cross-reference for other databases in the USEPA's program system.

FINDING: The Site as part of the AC Delco Averill Avenue facility was listed in the FINDS Report. Four other sites within a one-quarter mile radius of the Site were listed in the FINDS Report as follows:

<i>Facility</i>	<i>Address</i>	<i>Listing</i>
CW Transport, Inc.	4169 Davison Road	RCRIS
Burton Auto Collision	4105 Davison Road	RCRIS
DC Electric Motor Repair	4102 Davison Road	RCRIS
Sunoco Service Station	4012 Davison Road	RCRIS

Four of the listed facilities are adjacent to or across the street from the Site.

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3.1.2 State Databases

1. Michigan Underground Storage Tank (UST) List: The Michigan UST List is a comprehensive listing of all registered USTs located in the State of Michigan.

FINDING: The Site was not reported to be on the Michigan UST List. Twelve UST sites were listed within a one mile radius of the Site. Three of these sites are located on properties adjacent or in proximity to the Site.

2. Michigan Leaking Underground Storage Tank (LUST) List: The Michigan LUST List is a comprehensive listing of all reported LUSTs within the State of Michigan.

FINDING: The Site is part of the AC Delco Averill Avenue facility, which is listed in the Michigan LUST List. Nine additional sites within a one mile radius of the Site were listed in the Michigan LUST List. Three of these sites are adjacent or in proximity to the Site. Following is a listing of the nine sites:

<i>Facility</i>	<i>Address</i>	<i>Distance/Direction</i>
CW Transport, Inc.	4169 Davison Road	.05 miles/North
Sunoco Service Station	4012 Davison Road	.2 miles/Northwest
United Cleaners	4001 Davison Road	.3 miles/Northwest
Clark Oil & Refining Corp.	3802 Davison Road	.6 miles/Northwest
AC Spark Plug Division Engineering Complex	1601 North Averill Avenue	.75 miles/West
ANR Freight System	3318 E. Robert Longway	.5 miles/Southwest
Clark Oil Davison Road	3202 Davison Road	.85 miles/Northwest
Flint Store All	3502 Gorey	.5 miles/Southwest
Spartan Express/ Truck Terminal	2115 Branch Road	1 mile/Northwest

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CW Transport, Inc. is located immediately across Davison Road from the Site. The Sunoco Service Station and United Cleaners are located approximately 0.2 to 0.3 miles northwest of the Site, respectively. Due to the proximity of these LUST sites they are considered potential areas of concern.

3. Michigan Environmental Contamination List (ECL): The Michigan ECL List contains summary information pertaining to sites that are deemed hazardous by the Michigan Department of Natural Resources. The ECL List is the ASTM equivalent of a State Hazardous Waste Sites list.

FINDING: The Site was not reported to be on the Michigan ECL List. Three sites within a mile radius of the Site were reported to be on the Michigan ECL. Two sites are approximately one-half mile away from the Site. The third site, Action Auto Number 2, is located at 1275 North Center Road approximately one-quarter mile west of the Site.

3.2 HISTORICAL RECORDS REVIEW

3.2.1 Sanborn Fire Insurance Maps

Sanborn Fire Insurance maps assist in the identification of historic land use and commonly indicate the existence and location of aboveground and underground storage tanks, structures, improvements and facility operations. No Sanborn Maps were available for the Site for the period covering the years 1867 to 1990.

3.2.2 Aerial Photographs

Aerial photographs assist in the identification of Site features and outdoor activities of potential environmental concern. Aerial

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photographs for the years 1956 and 1962 were obtained and reviewed by CRA. The 1956 photograph depicted the outline of a test track, which may have been under construction. In the center of the Site, a large "X" shaped ground disturbance was evident with what appeared to be land disposal or stockpiling of materials. The "X" was likely the remnant of an old airfield. Surrounding properties were commercial, residential or agricultural.

The 1962 photograph depicted a developed test track and two buildings adjacent to the track. The track appeared to have sandy banks on both sides of the northern half of the track and extended along the access road to the north. The "X" ground scarring was less pronounced, but was still present. There was an area of ground scarring immediately east of the track. Surrounding properties were slightly different, but were still a mixture of commercial, residential and agricultural.

Summary of PAOCs

Based on the information contained in the environmental database search and the other historical information reviewed by CRA, the following PAOCs were identified.

- i) historical on-Site deposition of fill and ground scarring observed in aerial photographs; and
- ii) three LUST sites located across the street to the north of the subject property.

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4.0 ADJACENT LAND USES

The Site is located in a rectangular area bordered by Davison Road, North Genessee Road, Grand Trunk Rail Road and Consumer Power Right-Of-Way in the town of Burton, Genessee County, Michigan. The vacant parcel is located in an area which is primarily utilized and zoned as commercial with industrial activity from the adjacent AC Complex manufacturing facility. The Site is bordered to the north by Davison Road and beyond that by miscellaneous commercial establishments ranging from a post office to a bowling alley. The Site is bordered to the east by North Genessee Road and a combination of small commercial establishments and single family residential properties. The Site is bordered to the south by the Grand Trunk Railroad and beyond by a wooded area and residential development and large mall complex. The Site is bordered to the west by the Consumers Power Right-Of-Way and beyond by the AC Complex.

No adverse impact to the Site from adjacent properties was observed by CRA during the Site inspection. The CW Transport Inc. truck terminal located immediately north of the Site is a LUST site and may have impacted the subject Site. Other adjacent facilities which may have impacted the Site include the Sunoco Service Station and United Cleaners, as previously discussed.

Summary of PAOCs

Based on the observations regarding adjacent properties, the CW Transport Inc. truck terminal, the Sunoco Service Station and United Cleaners LUST sites were the only PAOCs identified.

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5.0 FACILITY INSPECTION

5.1 GENERAL

The 200-acre parcel Flint East Phase I ESA consisted of a Site inspection of the Site grounds, a review of limited records, an interview with Mr. Ronald Neahusan and Mr. James Klipa who are the Supervisor of Environmental Engineering and the Flint East wastewater treatment plant supervisor for the AC Complex respectively. The Site inspection was conducted by CRA personnel on August 10, 1994.

The 200-acre parcel consisted largely of unimproved naturally vegetated soils with a variety of plant species ranging from grasses to mature trees. A small parcel of the Site, approximately five acres in size is used as a golf range. Approximately one-half the Site was very heavily vegetated with brush and small trees. The Site was relatively flat with a majority of Site drainage handled by infiltration, with the remaining stormwater flow to ditches which would discharge to Gilkey Creek located in the southwest corner of the Site. Perched groundwater in the area is reported to flow to the southwest toward Gilkey Creek. The regional groundwater flow would likely flow toward the west or northwest toward the Flint River.

5.2 SITE OPERATIONS

Current Site operations consist of small amounts of on-Site disposal of a variety of fill materials. No other production, testing, or other activities are conducted by AC at the Site according to Site personnel. Previous activities at the Site have included: road testing of automobiles at an on-Site test track operated by General Motors Buick Motor Division and on-Site disposal of a variety of wastes as previously discussed.

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5.3 UNDERGROUND STORAGE TANKS (USTs)

There are currently no USTs located at the Site and none have ever been utilized by AC or Buick at the Site according to facility personnel. No evidence of USTs such as vent or fill pipes were observed by CRA during the Site inspection.

5.4 ABOVEGROUND STORAGE TANKS (ASTs)

There are currently no ASTs located at the Site according to Site personnel and none were observed by CRA during the Site inspection. Site personnel stated that aboveground bulk storage of fuel in ASTs was never conducted at the Site.

5.5 PRODUCT AND WASTE STORAGE AREAS

There were no chemicals utilized by AC at the Site according to Site personnel, and none were observed during the Site inspection.

5.6 WASTEWATER/SEWERS

There are no wastewater discharges and no sanitary or wastewater sewers located at the Site according to facility personnel.

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5.7 STORMWATER

The majority of stormwater at this Site infiltrates through the vegetated soils. The quantities of stormwater that do not infiltrate, travel by sheet flow over land to drainage discharges that discharge to Gilkey Creek located in the southwest corner of the Site. No problems associated with stormwater discharge from the Site are expected based on visual observations and the operations conducted at the Site. A potential problem could occur in the event of a major storm event where fill materials that have been deposited on-Site and have not been covered, could be washed along with the water into the creek and potentially off-Site.

5.8 NON-HAZARDOUS WASTE

There are no solid wastes currently generated at the Site according to Site personnel. As previously mentioned however, past and current on-Site solid waste disposal operations have occurred. Disposal operations have consisted primarily of open dumping of waste construction materials and yard wastes with a limited amount of cover and revegetation in several more recent areas. Historical disposal areas have been graded and revegetated.

During the 1970's, foundry sand was disposed of at the Site. Foundry sand is not considered a hazardous waste and typically contains varying quantities of heavy metals as a constituent of the sand. The foundry sand was analyzed for leachable metals, fluoride, chloride, cyanide and phenols by AC in 1974 before the sand was disposed on-Site. The analytical results identified only low levels of the analytical parameters in the samples and AC determined that the sand could be landfilled on-Site. MDNR subsequently issued a Solid Waste Area Disposal License for the periods of on-Site disposal of the foundry sand by AC.

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5.9 HAZARDOUS WASTE

According to facility personnel, no hazardous wastes are generated or have historically been generated at the Site.

5.10 SURFACE STAINING

The Site was observed to be in generally good condition at the time of the Site inspection, with the exception of the areas where active backfilling of construction materials and yard wastes was occurring.

5.11 CHEMICAL RELEASES/SPILLS

According to Site personnel there have been no reportable releases of hazardous substances to the environment at the Site. No significant spills of chemicals or other hazardous materials were observed by CRA during the Site inspection.

5.12 ASBESTOS-CONTAINING MATERIALS (ACM)

No ACM has ever been utilized at the Site according to Site personnel. In addition, no ACM was observed by CRA during the Site inspection.

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5.13 POLYCHLORINATED BIPHENYLS (PCBs)

There are no PCB containing transformers or electrical equipment located at the Site according to Site personnel. CRA did not observe any evidence of PCB containing equipment during the Site inspection.

5.14 AIR EMISSIONS

The Site presently does not have any air emission sources.

**5.15 COMMUNITY/STATE AGENCY/FEDERAL
AGENCY CONCERNS**

Agencies were not contacted concerning the Site because data search records and on-Site evaluation of operations did not identify any potential concerns involving environmental regulated issues.

5.16 CERCLA LIABILITIES

The facility is not listed on the NPL nor are there any NPL sites in the vicinity of the Site based on the information obtained by CRA. The MDNR identified the AC Flint East landfill (the Site) as a "Site With Potential Groundwater Contamination" in 1979 based on the type of operation, not on any specific Site data. The Site is not listed on the Michigan Act 307 List, however it is part of the AC Rochester/Delco Electronics Averill Avenue Complex and is a CERCLIS site.

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USEPA contracted PRC Environmental Management, Inc. to conduct a Preliminary Assessment/Visual Site Inspection (PA/VSI) in 1992. The PA/VSI final report dated November 18, 1992 identified six Solid Waste Management Units (SWMU's) and one Area of Concern (AOC) at the Averill Avenue Complex, however, none of the SWMU's or the AOC were associated with the subject 200-acre parcel.

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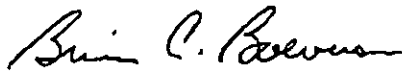
6.0 SUMMARY OF PAOCs

Based on the Phase I ESA, two PAOCs were identified at the 200-acre AC Delco Systems, Flint East property. The PAOCs were identified based on verbal information, visual observation and documentation. The PAOCs for the Site are summarized below:

<i>PAOC</i>	<i>Documentation</i>	<i>Product/Waste Released</i>
On-Site disposal of foundry sand and other solid wastes	Discussions with Site personnel and visual observation	No known releases of hazardous substances, however, the potential for release exists due to the potentially hazardous constituents of the waste materials
Adjacent LUST sites	Registered on Michigan LUST List	Potential for release of petroleum based product

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All of Which is Respectfully Submitted,
CONESTOGA-ROVERS & ASSOCIATES



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