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17 July 2009  
File No. 70613-400

New Jersey Department of Environmental Protection  
401 East State Street  
P.O. Box 432  
Trenton, New Jersey 08625

Attention: Jacqueline Bobko, Case Manager

Subject: Off-Site Investigation Work Plan  
Former Delphi Interior and Lighting Systems Division  
ISRA Case No. E97070  
1445 Parkway Avenue  
Trenton, New Jersey

Dear Ms. Bobko:

On behalf of Motors Liquidation Company (MLC) Haley & Aldrich, Inc. (Haley & Aldrich) has prepared this Off-Site Investigation Work Plan to address New Jersey Department of Environmental Protection's (NJDEP) email request on 29 May 2009 regarding further evaluation of the off-site distribution of PCE and TCE in groundwater monitoring well MW-55 located east of the eastern property boundary of the Former Delphi Interior and Lighting Systems Division site (Site). The Site is located in a mixed commercial, industrial, and residential area of Ewing Township, New Jersey (Figure 1). Monitoring well MW-55 is located approximately 300 feet northwest of The Children's Center and Preschool of Ewing, LLC located at 1243 Parkway Avenue (The Children's Center). NJDEP has raised concern regarding the potential presence of PCE or TCE in the near vicinity (within 100 feet) of The Children's Center structure.

In a letter to General Motors Corporation (GM) dated 15 June 2009, Haley & Aldrich presented information regarding the distribution of PCE and TCE east of Gold Run and listed a number of potential sources unrelated to operations at the Former Delphi facility. The letter concluded that the Site is not upgradient of The Children's Center or MW-55. Further, the letter documented that other sites in the area, unrelated to the former Delphi Site may have contributed to groundwater impact in the area of The Children's Center and/or MW-55. In response to the 15 June 2009 letter, the NJDEP requested additional work to investigate groundwater quality within 100 feet of The Children's Center. Although the Site is an unlikely source of contaminants in groundwater in the near vicinity of The Children's Center, Haley & Aldrich has prepared this work plan to further evaluate hydrogeologic conditions east of the Gold Run Pond between the eastern Site property boundary and The Children's Center. Based on the hydrogeological results, if the Site is upgradient of The Children's Center, overburden groundwater samples will be collected from selected wells in the area.

### **MONITORING WELL INSTALLATION**

Four overburden monitoring wells are proposed to be installed to evaluate groundwater flow direction east of Gold Run and in the vicinity of The Children's Center. Approximate locations of proposed monitoring wells are shown on Figure 2. Two off-site monitoring wells will be installed on The Children's Center property, one placed within 100 feet of the structure (proposed MW-57) and another located north of the structure along the driveway (proposed MW-58). A third monitoring well will be placed along Sylvia Street in the vicinity of the Credit Union of New Jersey (proposed MW-59). A fourth monitoring well will be placed in the wooded area north of MW-55 (proposed MW-60). Locations are subject to property access authorizations which will be obtained prior to installation.

The monitoring wells will be installed in accordance with methodology described in Section 10 of the December 2006 Remedial Investigation Report/Groundwater Investigation Workplan. The design and construction of the overburden monitoring wells will be similar to the most recently installed overburden wells; with 2-inch diameter PVC pipe and ten feet of PVC well screen. Maximum well depth is anticipated to be twenty feet below ground surface. Well screens will be installed across the water table to allow detection of both dissolved-phase constituents in groundwater and light non-aqueous phase liquid (LNAPL). Following installation, the wells will be developed to reduce turbidity. Monitoring well locations and elevations will be measured by a licensed New Jersey land surveyor and NJDEP Monitoring Well Certification Forms A & B will be prepared.

### **HYDROGEOLOGICAL ANALYSIS**

The purpose of the hydrogeological analysis is to further evaluate the overburden groundwater flow direction east of the Site and surrounding The Children's Place and update the current site conceptual model (CSM) described in the 15 June 2009 memorandum. Following installation, groundwater levels will be measured in each of the four new monitoring wells, existing off-site monitoring wells MW-55 and MW-56, and select on-site monitoring wells and piezometers in the vicinity of Gold Run Pond. Proposed water level monitoring locations are shown on Figure 3. If access is granted, depths to water will be measured in monitoring wells at the automobile service center near the intersection of Parkway Avenue and Scotch Road.

Depths to groundwater will be converted to elevations using surveyed reference elevations from each monitoring well. Groundwater elevations will be contoured to determine the overburden groundwater flow direction. The outcome of this analysis will be one of the following:

- If the interpreted groundwater flow direction clearly indicates the Site is not upgradient of The Children's Center, the hydrogeological information will be summarized in a memorandum to NJDEP and no groundwater sampling and analytical testing will be undertaken; or,
- If the interpreted groundwater flow direction indicates that the Site is upgradient of The Children's Center, groundwater samples from the new monitoring wells will be obtained and the samples will be tested following methodology described below.

### **GROUNDWATER SAMPLING (CONDITIONAL)**

Groundwater samples will be collected from the new monitoring wells and existing monitoring wells MW-55 and MW-56 in accordance with methodology described in Section 10 and Appendix M (Quality Assurance

Project Plan) of the December 2006 Remedial Investigation Report/Groundwater Investigation Workplan. Samples will be collected a minimum of two weeks following new monitoring well installation.

The groundwater samples will be tested for target compound list volatile organic compounds (TLC VOC+10) only. Analytical results will be tabulated.

## REPORTING

A report will be prepared summarizing the site conceptual model and key elements of the 15 June 2009 memo, methodology and outcome of the monitoring well installations, results of the hydrogeological evaluation, and, if completed, an interpretation of analytical testing results. If necessary, the report will provide recommendations for additional investigations. The summary report will be submitted to NJDEP for review.

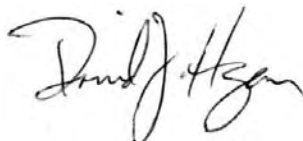
Following NJDEP approval of this work plan, MLC will begin acquiring property access agreements with The Children's Center (proposed MW-57 and MW-58), Ewing Township and Credit Union of New Jersey (MW-59), and the Ellis Pierson Trust (MW-60). A preliminary project schedule previously submitted to NJDEP is provided as Figure 4. We request that the NJDEP issue a directive to the property owners to facilitate execution of access agreements in a timely manner (see Attachment 1 for contact information).

We appreciate the opportunity to provide environmental consulting services on this project. Please do not hesitate to call if you have any questions or comments.

Sincerely yours,  
HALEY & ALDRICH, INC.



Douglas C. Allen, P.G.  
Senior Hydrogeologist



David J. Hagen, C.P.G.  
Senior Vice President

## Enclosures:

- References
- Figure 1 – Site Locus
- Figure 2 – Proposed Off-Site Monitoring Locations
- Figure 3 – Proposed Hydrogeological Monitoring Locations
- Figure 4 – Project Schedule
- Attachment 1 – Off-Site Property Owners

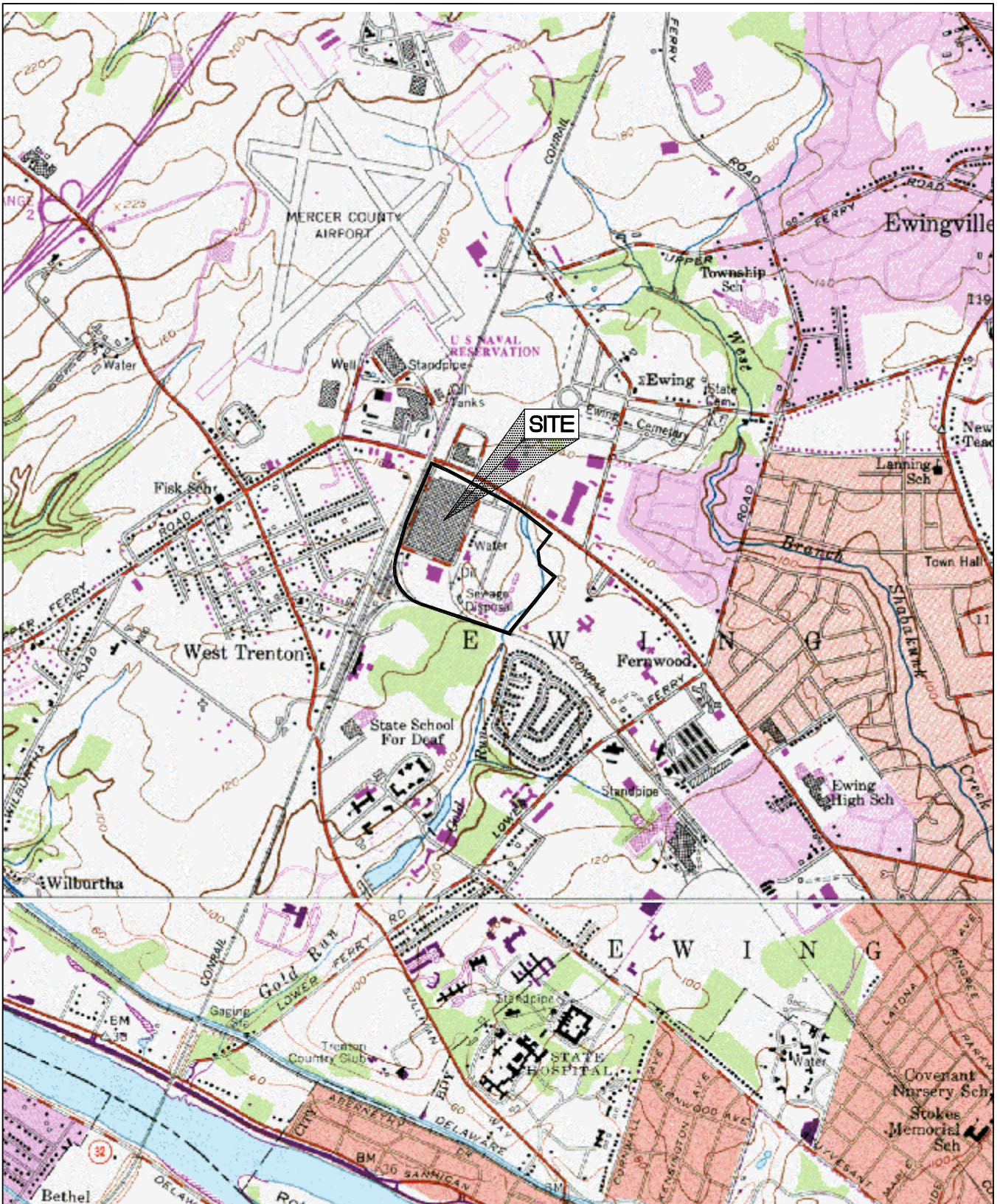
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## REFERENCES

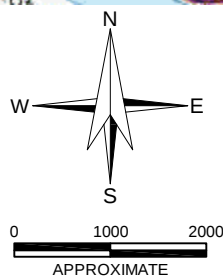
1. Haley & Aldrich, Inc., 2006, Remedial Investigation Report/Groundwater Investigation Workplan, Former Delphi Interior and Lighting Systems Division, December 2006.
2. Haley & Aldrich, Inc., 2009, MW-55 Area Supplemental Information Memorandum, June 2009.

## FIGURES

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SOURCE:  
PENNINGTON QUADRANGLE, NEW JERSEY  
- PENNSYLVANIA, USGS 7.5 MINUTE  
SERIES (TOPOGRAPHIC), DATED 1954,  
PHOTOREVISED 1981 AND TRENTON WEST  
QUADRANGLE, NEW JERSEY -  
PENNSYLVANIA, USGS 7.5 MINUTE SERIES  
(TOPOGRAPHIC), DATED 1955,  
PHOTOREVISED 1981.



**HALEY & ALDRICH**

FORMER DELPHI INTERIOR AND LIGHTING SYSTEMS DIVISION  
1445 PARKWAY AVENUE  
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**SITE LOCUS**

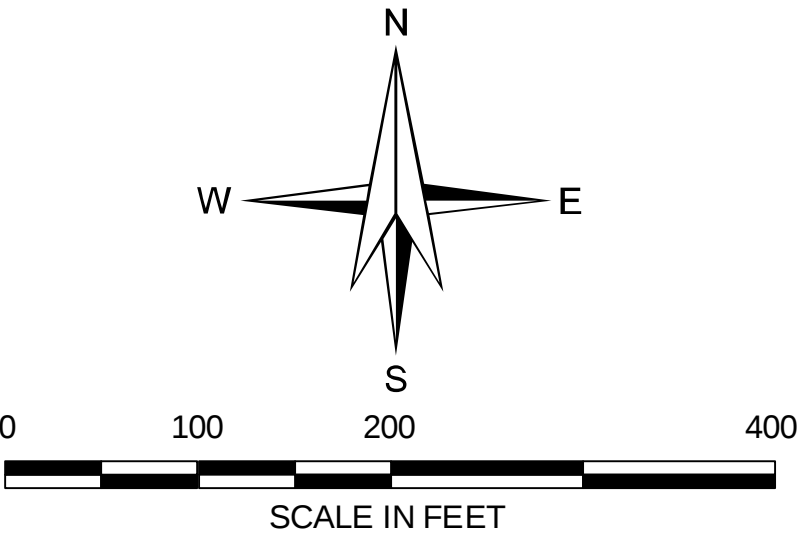
SCALE: AS SHOWN  
JULY 2009

**FIGURE 1**



NOTE:  
1. AERIAL PHOTOGRAPHY PROVIDED BY NEW JERSEY  
DEPARTMENT OF ENVIRONMENTAL PROTECTION, BUREAU  
OF GEOGRAPHIC INFORMATION SYSTEM, DATED YEAR OF  
2007.

- LEGEND**
-  PROPOSED OFF-SITE MONITORING LOCATIONS
  -  MW LOCATIONS
  -  OBSERVATION POINTS
  -  ESTATE OF ELLIS PIERSON PROPERTY LINE
  -  FORMER DELPHI FACILITY PROPERTY BOUNDARY



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**PROPOSED OFF-SITE MONITORING  
LOCATIONS**

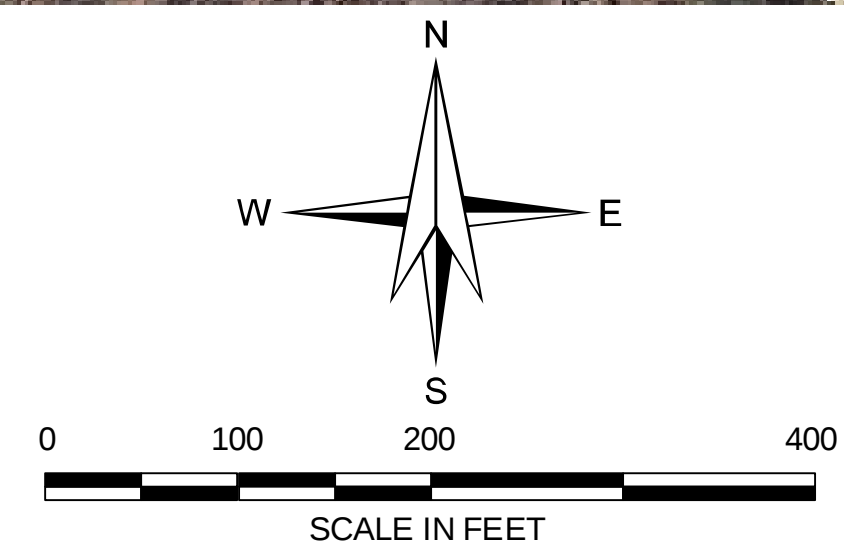
SCALE: AS SHOWN  
JULY 2009

**FIGURE 2**



NOTE:  
1. AERIAL PHOTOGRAPHY PROVIDED BY NEW JERSEY  
DEPARTMENT OF ENVIRONMENTAL PROTECTION, BUREAU  
OF GEOGRAPHIC INFORMATION SYSTEM, DATED YEAR OF  
2007.

- LEGEND
- PROPOSED OFF-SITE MONITORING LOCATIONS
  - MW LOCATIONS
  - OBSERVATION POINTS
  - PROPOSED LOCATION FOR HYDROGEOLOGICAL MONITORING
  - ESTATE OF ELLIS PIERSON PROPERTY LINE
  - FORMER DELPHI FACILITY PROPERTY BOUNDARY



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**PROPOSED HYDROGEOLOGICAL  
MONITORING LOCATIONS**

SCALE: AS SHOWN  
JULY 2009

**FIGURE 3**



**ATTACHMENT 1**

**Off-Site Property Owners**

**Attachment 1****Off-Site Property Owners**

Former Delphi Interior and Lighting Systems Division  
1445 Parkway Avenue  
Ewing, New Jersey  
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1. The Children's Center and Preschool of Ewing, LLC  
1243 Parkway Avenue, Ewing, New Jersey  
Representative: Jonathan Lamond  
Phone: (609) 771-8500  
email: [jonathan@childrenscenterllc.com](mailto:jonathan@childrenscenterllc.com)
2. Kaplan Bazelewsky Inc DBA Parkway Service Center  
1252 Parkway Avenue, Ewing, New Jersey  
Phone: (609) 883-8249  
NJDEP Program Interest # 021735  
  
Consultant: Secor International, Inc.  
Senior Engineer: Andrew Thomas  
Phone: (609) 844-7608