

Kaiding, Derek

From: Rudloff, Gregory <rudloff.gregory@epa.gov>
Sent: Thursday, October 24, 2013 9:48 AM
To: Dave Favero; Grant Trigger
Cc: Kaiding, Derek; Olsberg, Colleen
Subject: RE: EPA Comments on RFI Report for Former GMPT - Livonia Project
Attachments: Example exposure table .pdf

The U.S. EPA has completed a review of the CA725 Current Human Exposures Under Control document dated August 2, 2013. Below are EPA's comments:

1. Page 8- The document indicates that exposure risk to off-site receptors is not significant based on the fact that an Internet check revealed no domestic water wells within a half mile radius of the facility and drinking water is being supplied by the City of Livonia. EPA recommends that RACER do some in person checks as to whether additional wells exist and also how groundwater is being used off-site. A simple check of the Internet may not provide an accurate or complete picture.
2. Page 9- The conceptual site model for the human health assessment needs to be expanded. The document should provide information on exposure routes and exposure mediums for all receptor populations both on-site and off-site (current and future land use). Attached is an example of the type of table that RACER should complete in order to include all relevant exposure information regarding receptor populations.
3. Appendix B-2 page 5 shows SVOC concentrations above screening levels at AOI-33. If these contaminants are not a concern, the document should contain text explaining their presence.

Please provide the information requested above to EPA. This information may be provided in a revised version of the RFI Final Report, or in a revision to the Corrective Measures Plan. In addition, EPA approves the abandonment of the 13 temporary monitoring wells installed during the RFI. Feel free to contact me if you have any questions.

Gregory A. Rudloff, P.G.
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From: Kaiding, Derek [mailto:DKaiding@haleyaldrich.com]
Sent: Friday, July 26, 2013 12:49 PM
To: Rudloff, Gregory
Cc: Grant Trigger; Dave Favero
Subject: RE: EPA Comments on RFI Report for Former GMPT - Livonia Project

Sure –

Here they are.

Derek

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From: Rudloff, Gregory [<mailto:rudloff.gregory@epa.gov>]
Sent: Friday, July 26, 2013 1:15 PM
To: Kaiding, Derek
Cc: Grant Trigger; Dave Favero
Subject: RE: EPA Comments on RFI Report for Former GMPT - Livonia Project

Could I get the EI725 and EI750 documents in word format. I need to make a few minor revisions.

Thanks,

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From: Kaiding, Derek [<mailto:DKaiding@haleyaldrich.com>]
Sent: Monday, June 17, 2013 12:26 PM
To: Rudloff, Gregory
Cc: Grant Trigger; Dave Favero
Subject: RE: EPA Comments on RFI Report for Former GMPT - Livonia Project

Hi Greg,

On behalf of RACER Trust, attached please find a draft version of the revised RFI Report, with edits to the text (track changes used) that incorporate information to address USEPA's comments noted below. If you find these edits acceptable for addressing your comments, we will finalize and distribute the revised report, accordingly. Otherwise, perhaps we could schedule a call to discuss these edits/comments. Let us know, and we will follow up, accordingly.

Regards,

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From: Rudloff, Gregory [<mailto:rudloff.gregory@epa.gov>]
Sent: Tuesday, May 21, 2013 2:15 PM
To: Dave Favero; Grant Trigger

Cc: Kaiding, Derek; Little, Paul

Subject: RE: EPA Comments on RFI Report for Former GMPT - Livonia Project

The U.S. Environmental Protection Agency, Region 5 has completed a review of the document *RCRA Facility Investigation Report, Former GM Powertrain Division Livonia*, dated March 15, 2013. Below are EPA's comments.

2.3 RFI Work Plan Modifications

1. The actual versus planned number of soil samples collected and analyzed to offset the anticipated reduction in groundwater data should be specified.

3.2 Groundwater Use/ Water Supply

2. The distance to the domestic well located downgradient of the Site should be specified.

4. INVESTIGATION RESULTS AND DISCUSSION

3. The results of video recording of the trenches and former process conveyance lines should be discussed here and the data included as an appendix (DVD would be fine).
4. The results of the GPR surveys at AOI-08, AOI -17, and AOI -26 should be discussed here and the data included in an appendix.

4.2.2 Analyte Detections and Criteria Exceedances

5. The arsenic exceedances in soil should be discussed further in this section, including a discussion of background levels.
6. The Michigan Background Soil Survey 2005 values should be referenced for comparison to site data.

Please submit a revised version of the RFI Report to EPA addressing the comments above. Let me know if you need any additional information.

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Table 1-1: Scenarios for Potential Human Exposure
Vernay Laboratories, Inc. - 875 Dayton Street, Yellow Springs, Ohio

Exposure Area & Exposure Point(s)	Receptor Population	Exposure Route	Exposure Medium	Possible Currently	Possible in Future	Comments
On - Facility						
Vernay Laboratories, Inc. -- 875 Dayton Street Facility	Routine Workers	ingestion and dermal contact	surface soil	Yes	Yes	The main (eastern) portion of the facility is covered with building and pavement. The largest unpaved area is in the unused western portion of the facility. Potential exposure of workers may occur at unpaved areas, and (in the future) at areas where pavement is removed. Potential inhalation exposures of workers may also occur due to vapor migration to ambient air and indoor air from VOCs in soil, subsurface water and Cedarville Aquifer ground water.
		inhalation	particulates in air from surface soil	Yes	Yes	
		inhalation	vapor released to ambient air from soil (surface and subsurface), subsurface water and Cedarville Aquifer ground water	Yes	Yes	
		inhalation	vapor intrusion to indoor air from soil (surface and subsurface), subsurface water and Cedarville Aquifer ground water	Yes	Yes	
	Trespassers	ingestion and dermal contact	surface soil	Yes	Yes	The facility is not fully fenced, therefore, trespassers may cross the property. The main (eastern) portion of the facility is covered with building and pavement. The largest unpaved area is in the unused western portion of the facility. Potential exposure of trespassers may occur at unpaved areas, and (in the future) at areas where pavement is removed. Potential inhalation exposures may also occur due to vapor migration to ambient air from VOCs in soil, subsurface water and Cedarville Aquifer ground water (in unpaved areas).
		inhalation	particulates in air from surface soil	Yes	Yes	
		inhalation	vapor released to ambient air from soil (surface and subsurface), subsurface water and Cedarville Aquifer ground water	Yes	Yes	
	Occasional Excavation/Maintenance Workers	ingestion, dermal contact and inhalation	surface and subsurface soil	Yes	Yes	Potential exposure of Vernay maintenance workers is possible to soil and subsurface water and Cedarville Aquifer ground water during excavation activities; to subsurface water during maintenance in the utility tunnel; and to surface water during maintenance of on-Facility sewer system (exposure frequency is 5 days per year for Vernay maintenance worker).
		ingestion, dermal contact and inhalation	subsurface water, sewer backfill water, and Cedarville Aquifer ground water	Yes	Yes	
		ingestion, dermal contact and inhalation	surface water (storm sewer system)	Yes	Yes	
	One-Time Building Construction Workers	ingestion, dermal contact and inhalation	surface and subsurface soil	No	Yes	Vernay has no current plans for building construction. Future commercial/industrial site use could include the construction of a new building.
		ingestion, dermal contact and inhalation	subsurface water, sewer backfill water and Cedarville Aquifer	No	Yes	