

Kaiding, Derek

From: Rudloff, Gregory <rudloff.gregory@epa.gov>
Sent: Wednesday, August 07, 2013 2:29 PM
To: Dave Favero; Kaiding, Derek
Cc: Grant Trigger
Subject: RE: EPA Comments on RFI Report for Former GMPT - Livonia Project
Attachments: 2013-0722_Action Item List-Livonia PT-DRAFT-EPA Edits 2013-08-7.docx

Attached is a revised version of the action items with EPA comments. Let me know if you need any additional information.

Gregory A. Rudloff, P.G.
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From: Dave Favero [<mailto:dfavero@racertrust.org>]
Sent: Saturday, July 27, 2013 10:35 AM
To: Rudloff, Gregory; Kaiding, Derek
Cc: Grant Trigger
Subject: RE: EPA Comments on RFI Report for Former GMPT - Livonia Project

We meant to discuss the Livonia Powertrain project for a few minutes on Friday. I think Grant mentioned closure check lists for projects. Please see attached called action items but the same idea for the Powertrain project. We would appreciate any feedback from you on the need for these or other action items. After we have a list it would be good to discuss the items so we are on the same page regarding how best to address the items.

Thanks,
David Favero
Deputy Cleanup Manager - Michigan

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From: Rudloff, Gregory [<mailto:rudloff.gregory@epa.gov>]
Sent: Friday, July 26, 2013 1:55 PM
To: Kaiding, Derek
Cc: Grant Trigger; Dave Favero
Subject: RE: EPA Comments on RFI Report for Former GMPT - Livonia Project

Thanks.

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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,

Derek C. Kaiding, P.E.
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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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**RACER TRUST
GMPT Livonia Site
12200 Middlebelt, Livonia, MI**

**Remaining Action Items – RCRA Corrective Action Program
July 22, 2013**

Action Item:	To Be Performed By:
1. Finalize and distribute Revised RFI Report	Haley & Aldrich on behalf of RACER Trust
2. Finalize and distribute CA 725 and CA750 Forms	USEPA
3. Prepare and submit 2013 Annual EA Budget Amendment Request No. 2 to perform the following: a. Prepare and submit Corrective Measures Plan; b. Prepare and distribute MI Due Care Plan; c. Abandon all existing wells.	Haley & Aldrich on behalf of RACER Trust
4. Review and approve 2013 Annual EA Budget Amendment Request No. 2.	USEPA
5. Abandon all existing wells.	Haley & Aldrich on behalf of RACER Trust
6. Prepare and distribute MI Due Care Plan	Haley & Aldrich on behalf of RACER Trust
7. Prepare and submit Corrective Measures Plan	Haley & Aldrich on behalf of RACER Trust
8. Review and approve Corrective Measures Plan	USEPA
9. Prepare and submit Restrictive Covenant	RACER Trust
10. Review and approve Restrictive Covenant	USEPA
11. Finalize and file Restrictive Covenant	RACER Trust
12. Prepare and distribute Statement of Basis	USEPA
13. Publish Public Notice	USEPA
14. Conduct Public Hearing (if needed)	USEPA
15. Prepare and execute Final Decision/ Corrective Measures Implementation Order	USEPA and RACER Trust
16. Finalize and file Restrictive Covenant	RACER Trust
17. Prepare and submit Corrective Action Complete with Controls	Haley & Aldrich on behalf of RACER Trust
18. Publish Public Notice	USEPA
19. Conduct Public Hearing (if needed)	USEPA
20. Review and approve Corrective Action Complete	USEPA

Comment [GAR1]: Draft covenant can be included in CMP.

Comment [GAR2]: Since this will be part of the remedy, may need to wait until after public comment period and Final Decision.

Comment [GAR3]: Covered by current performance based agreement.

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with Controls	
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