



17075

**Worldwide Facilities Group  
Environmental & Regulatory Support  
Remediation Team**

January 21, 2006

Mr. Peter Ramanauskas  
Project Manager  
U.S. EPA, Region 5  
Waste, Pesticide and Toxins Division  
77 West Jackson Boulevard DW-8J  
Chicago, IL 60604-3590

Dear Mr. Ramanauskas:

Re: Proposed Amendment to the Interim Measures Work Plan for LNAPL Impacted Soil in IU B  
GM Powertrain Saginaw Metal Casting Operations, MID-041-793-340

This letter is a Proposed Amendment to the December 9, 2004 U.S. EPA approved Interim Measures (IM) Work Plan for LNAPL-Impacted Soil in IU B. The remediation approach defined in the approved IM Work Plan included excavation of LNAPL. The limit of the proposed excavation was identified using monitoring wells (MW-00304 and MW-00305) and geoprobe data; Figure 1 presents the extent of the excavation proposed in the IM Work Plan. This amendment has been prepared to specify an alternative interim measures approach for this LNAPL area since monitoring conducted after approval of the IM Work Plan has not detected LNAPL at levels greater than 0.3-inch in MW-00305. Due to the absence of LNAPL in MW-00305 and the apparent lack of any migration of the LNAPL plume, GM proposes the following modifications to the Work Plan.

Section 4.0 of the Work Plan should be replaced with the following.

4.0 Proposed Full-Scale Interim Measures

Interim measures will consist of the installation of one additional monitoring well and a monthly monitoring program to observe for the presence of downgradient LNAPL (i.e. monitor to confirm no LNAPL migration).

4.1 Installation of Additional Monitoring Well

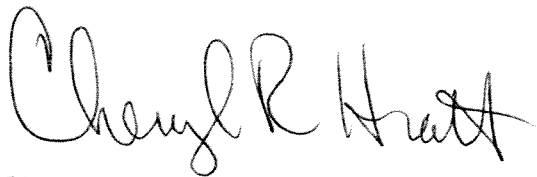
GM proposes the installation of one monitoring well, MW-00304A, downgradient of MW-00305 as presented on Figure 1. Monitoring well MW-00304A will be used to supplement MW-00305 in monitoring for the presence of LNAPL. The well will be screened at the water table (i.e. across the suspected LNAPL impacted area).

#### 4.2 Monitoring Plan

GM proposes monthly monitoring of MW-00305 and MW-00304A. This monitoring program will replace the soil excavation activities originally proposed. Should LNAPL be observed in either MW-00305 or MW-00304A at a thickness greater than one inch, GM will initiate passive recovery of LNAPL. If LNAPL is observed in MW-00304A at a thickness of greater than one inch, GM will install another new well further downgradient to monitor migration. GM will propose more active remediation if LNAPL migration continues.

Should you have any questions please call me at (248) 753-5799.

Yours truly,

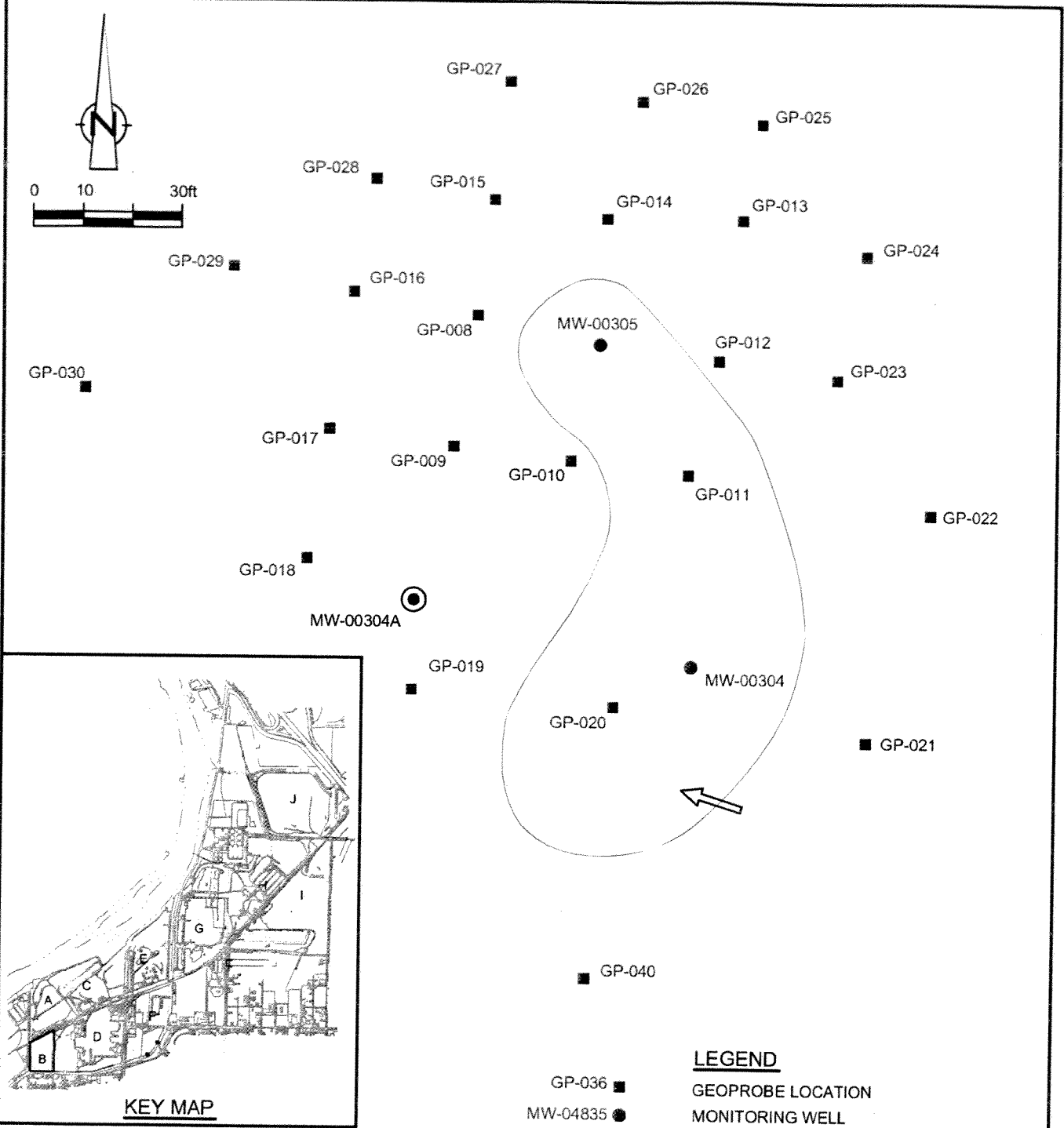


Cheryl Hiatt  
REALM Project Manager

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Encl.

c.c.: Jean Caufield, GM  
Michael Tomka, CRA



- LEGEND**
- GP-036 ■ GEOPROBE LOCATION
  - MW-04835 ● MONITORING WELL
  - YELLOW LNAPL OBSERVED
  - PROPOSED MONITORING WELL LOCATION
  - ➔ GROUNDWATER FLOW DIRECTION

figure 1  
 INVESTIGATIVE UNIT B - LNAPL - SOIL  
 GENERAL MOTORS CORPORATION  
 SAGINAW METAL CASTING OPERATIONS  
 Saginaw, Michigan

