



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING



DAN WYANT
DIRECTOR

March 29, 2011

Mr. David Favero
Motors Liquidation Company
c/o Favero Geosciences
1210 South 5th Street
Springfield, Illinois 62703

Rec'd CRA
APR 06 2011

Dear Mr. Favero:

SUBJECT: Monitoring Well Installation and Groundwater Monitoring Report (Report); Former Peregrine (US) Inc., Coldwater Road Facility, Genesee Township, Michigan; MIR 000 020 743

The Department of Environmental Quality (DEQ), Resource Management Division (RMD), has completed its review of the Report dated February 14, 2011. The Report was reviewed for compliance with the applicable provisions of Part 111, Hazardous Waste Management, and Part 201, Environmental Remediation, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended and its administrative rules, Michigan Administrative Code R 299.5101 *et seq.*, and the Investigation Work Plan, approved on October 28, 2010 (Work Plan). Based on our review, the RMD has the comments listed below.

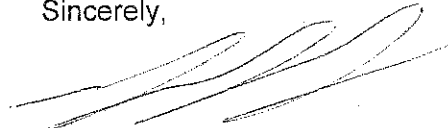
1. The Report must be revised to provide copies of field data sheets and static water elevation data as specified in the approved Work Plan.
2. The Report must be revised to provide additional documentation of the statement in the Report that the groundwater to surface water interface (GSI) pathway is incomplete. This revision is necessary in order to document that contaminated groundwater is not venting to storm sewers that are discharging to surface waters of the state. As specified in R 299.5716 of the Part 201 Rules, groundwater venting to storm sewers connected to surface water would represent a completed GSI pathway.
3. The Report documents contamination of groundwater above applicable Part 201 drinking water criteria in both the shallow (till) and deep (drift aquifer) monitoring wells. In addition, the groundwater contamination in both the till unit and the drift aquifer is present above criteria at locations without clear delineation to concentrations below criteria at the borders of the facility. Based on this fact, the RMD has several related comments, provided below.
 - a. Please revise the Report to evaluate groundwater data to Part 201 residential drinking water criteria. This revision is necessary in order to evaluate the potential of off-site impacts.
 - b. Please revise the Report to provide additional documentation of the statement in the Report that the non-residential drinking water exceedances in the drift aquifer are likely due to naturally occurring or background concentrations. If additional documentation is not available at the current time, then the Recommendations section of the Report (Section 5.0) must be revised to provide a method whereby background concentrations of metals will be established. It should be noted that there are monitoring wells associated with the Coldwater Road Landfill located just north of the site that could potentially be used for such a background study.

- c. Groundwater with contaminant concentrations above drinking water criteria has the potential to migrate off-site and represents a potential uncontrolled exposure unless it is documented to be: (i) below residential drinking water at the border of the facility; (ii) due to background concentrations; and (iii) controlled off-site via some type of institutional control. The Report must be revised to discuss this scenario and provide recommendations for additional investigation/work required to address this issue. Of particular note are the arsenic and iron concentrations detected in drift aquifer monitoring well PFW-1, which were reported at 489 micrograms per liter ($\mu\text{g/L}$) and 17 $\mu\text{g/L}$, respectively, which are well above potential background concentrations. It should also be noted that this well was sampled in 1997 and arsenic was not detected.
 - d. The Report must be revised to provide for a minimum of three additional groundwater sampling events in 2011 (spring, summer, and fall). Additional sampling events are required to better understand representative groundwater concentrations and help to determine if off-site migration of groundwater contamination is occurring.
4. The DEQ is in agreement with the Report's Conclusion that MW-15-10 and MW-16-10 need to be redeveloped prior to future sample events.

Please provide a response to these comments with 45 days of receipt of this letter.

Should you require further information, please contact me at 517-241-2018; confortir@michigan.gov; or DEQ, P.O. Box 30241, Lansing, Michigan 48909-7741.

Sincerely,



Richard Conforti, Environmental Engineer
Hazardous Waste Section
Resource Management Division
517-241-2108

cc: Mr. Michael Tomka, Conestoga-Rovers & Associates
Mr. John McCabe, DEQ
Mr. Joe Rogers/Ms. Virginia Himich/EPA Reporting
Mr. William Yocum, DEQ
Corrective Action File