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

January 9, 2001

Ms. Cheryl Howe
Senior Environmental Engineer
Hazardous Waste Program Section
Waste Management Division
P.O. Box 30241
Lansing, Michigan 48909-7741

Re: Response to Michigan Department of Environmental Quality's Technical Review Comments on the Hazardous Waste Control Tank Report
Saginaw Metal Casting Operations
Saginaw Michigan
MID 041 793 340

Dear Ms. Howe:

General Motors (GM) has reviewed the Michigan Department of Environmental Quality's (MDEQ) Technical Review Comments dated May 24, 1999, on the Hazardous Waste Control Tank Report (Report). The following present the MDEQ's comments followed by GM's response. For the purpose of maintaining a complete record, copies of relevant correspondence related to the closure of this unit have been attached to this letter.

Hazardous Waste Control Tank Report

The October 1989 Closure Report, that was received on November 17, 1989, was reviewed and compared to the approved May 1988 Closure Plan. The following comments/concerns are related to the Hazardous Waste Control Tank Report:

1. The Report states that during Phase I, one sample was collected and tested for 1,1,1-Trichloroethane and five breakdown parameters. The sample result was 4.9 micrograms per kilogram (µg/kg) of 1,1,1-Trichloroethane. A Phase II sampling was conducted and three of seven samples indicated concentrations of 1,1,1-Trichloroethane were detected, but all below 1 µg/kg. It was also noticed that the field blank (using the same potable water source as during Phase I) also had low levels of 1,1,1-Trichloroethane. A Phase III sampling (using water from another

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source) was conducted and the results for two soil samples and two field blanks were all non-detect.

The concentration of 1,1,1-Trichloroethane in the field blank (0.53 µg/kg) would not be sufficient to explain the concentration in the first sample tested (4.9 µg/kg). Re-sampling of the first site will be required, if the criteria under Part 201, Environmental Remediation, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Part 201), are not used. Because the concentrations of 1,1,1-Trichloroethane in all of the soil samples and the field blanks are below the Part 201 Generic Residential Drinking Water Protection Criteria, the Waste Management Division (WMD) would have no further concerns with these sampling results, if the Part 201 criteria are used.

*Response:* *GM concurs that the closure review should be completed using the current standards under Part 201, Environmental Remediation, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Part 201). The concentration of 1,1,1-trichloroethane in all of the soil samples and field blanks are below the Residential Land Use, Part 201 Generic Cleanup Criteria and Screening Levels for all potential pathways (June 7, 2000, Integrated Tables), as described below:*

- *Groundwater Protection: The concentrations of 1,1,1-trichloroethane detected in the blanks and in the collected soil samples are below the Residential and Industrial Land Use criteria (i.e., 4,000 µg/kg) for the protection of drinking water. Therefore, no further evaluation is necessary.*

- *Groundwater-Surface Water Interface Protection: The concentrations of 1,1,1-trichloroethane detected in the blanks and in the collected soil samples are below the criterion (i.e., 4,000 µg/kg) for the protection of the groundwater-surface water interface. Therefore, no further evaluation is necessary.*

- *Groundwater Contact: The concentrations of 1,1,1-trichloroethane detected in the blanks and in the collected soil samples are below the criterion (i.e., 460,000 µg/kg) for groundwater contact. Therefore, no further evaluation is necessary.*

- *Soil Volatilization to Indoor Air Inhalation: The concentrations of 1,1,1-trichloroethane detected in the blanks and in the collected soil samples are below the Residential and Industrial Land Use criteria (i.e.,*

*250,000 and 460,000 µg/kg, respectively) for soil volatilization to indoor air. Therefore, no further evaluation is necessary.*

- *Ambient Air: The concentrations of 1,1,1-trichloroethane detected in the blanks and in the collected soil samples are below the Residential and Industrial Land Use criteria for the following pathways related to ambient air:*
  - *Infinite Source Volatile Soil Inhalation*
  - *Finite Volatile Soil Inhalation for 5 Meter Source Thickness*
  - *Finite Volatile Soil Inhalation for 2 Meter Source Thickness*
  - *Particulate Soil Inhalation*

  *Therefore, no further evaluation is necessary.*
- *Soil Direct Contact: The concentrations of 1,1,1-trichloroethane detected in the blanks and in the collected soil samples are below the Residential and Industrial Land Use criteria (460,000 µg/kg) for the direct contact of soil.*

Based on the Report and on the above response, GM respectfully requests that closure be granted for the former Hazardous Waste Control Tank. If you have any questions or comments, or would like any additional information, please contact me at (313) 556-9032.

Sincerely,

Cheryl R. Hiatt

Ms. Cheryl R. Hiatt
GM Project Coordinator

Attachment: Copies of Relevant Correspondence Related to Closure

cc: Mirtha Capiro, USEPA Region 5
James Sygo, MDEQ-WMD
Ed Haapala, MDEQ-WMD
Lisa Williams, USDOI
Tony Thrubis, GM Legal Staff
Jean Caufield, GM Remediation Team
Raymod Ilkka, SMCO Environmental Activities
Jim McGuigan, CRA Project Coordinator