



November 10, 2009

U.S.EPA Region II
Emergency & Remedial Response Division
290 Broadway, 19th Floor
New York, NY 10007-1866
Attn: Ms. Anne Kelly

RE: Former Central Foundry – Massena Superfund Site, Massena, New York
EPA Orders Index No. II CERCLA-20207 and 20215 -
Monthly Progress Report No. 210 for October 2009

Dear Ms. Kelly:

On behalf of Motors Liquidation Company (MLC), BOW Environmental Solutions, Inc., enclosed please find 2 copies of the Monthly Progress Report relating to the activities performed during the month of October 2009, in conformance with the Unilateral Administrative Orders for both operable units of the Former Central Foundry, Massena Superfund Site.

Should you or your staff have any questions regarding the contents of the Progress Report, please contact me at (937) 478-8221.

Sincerely,

A handwritten signature in black ink that reads "Pamela L. Barnett". The signature is written in a cursive, flowing style.

Pamela L. Barnett, PG
Project Manager
BOW Environmental Solutions, Inc. on behalf of MLC

Monthly Progress Report No. 210 – October 2009
Former Central Foundry Massena Superfund Site - Operable Units 1 & 2
USEPA Unilateral Administrative Orders Nos. II CERCLA - 20207 & 20215

I. Compliance Activities Completed for the Period (October 1 through October 31, 2009)

Site Wide

In a letter dated October 1, 2009, MLC provided EPA with a formal response to the August 20, 2009 letter and provided a status update on mutually agreed upon deliverables. In a letter dated October 9, 2009, MLC submitted the following items:

- Draft white paper outlining a hybrid remedial strategy to address remaining units at the site.
- Work Plan for delineation of remaining off-site soils.
- Overall Site Schedule for remaining deliverables.

Negotiations between MLC and USEPA on the site wide remedial exit strategy continue during the rest of the month.

East Disposal Area

On October 13, 2009, ARCADIS received (via email) the final laboratory analytical reports for all samples collected during the *Soil Investigation Work Plan - East Disposal Area Infield*. Conestoga-Rovers & Associates (CRA) is in the process of validating of the data. The data will be used to develop the remedial action for this area.

Groundwater Controls

On June 10, 2009, the revised *Interim Groundwater Characterization Sampling and Analysis Report* was submitted to USEPA along with responses to EPA's May 14, 2009 comments.

On September 25, 2006, the draft *Quality Assurance Project Plan (QAPP)* was submitted to USEPA for approval. MLC is awaiting approval from USEPA of this plan.

Mohawk Uplands Soils

On October 9, 2009, MLC submitted the *Mohawk Uplands Soil/Sediment Sampling Work Plan* to USEPA for approval.

The *Mohawk Upland Area Remedial Action Completion Report* was submitted to USEPA on February 6, 2008. MLC is awaiting approval from USEPA of this completion report.

Access to the one remaining property of concern on the St. Regis Mohawk Tribal Reservation (the north parcel) continues to be restricted by the property owner.

Monthly Progress Report No. 210 – October 2009
Former Central Foundry Massena Superfund Site - Operable Units 1 & 2
USEPA Unilateral Administrative Orders Nos. II CERCLA - 20207 & 20215

Cove Project

On April 24, 2006, the revised draft *Cove Remedial Action Completion Report* was submitted to USEPA for approval. MLC is awaiting USEPA's approval of this completion report.

Facility Activities

On October 1, 2009, MLC filed a Report of Noncompliance Event with the NYSDEC Division of Water. A pH reading of 9.3 was measured at the 003 Storm Water Outfall on September 27, 2009. The permit range is 6.0 – 9.0 for pH. The pH suspected to be out of range due to the close proximity of sample location to the location of the tubing from the chemical disinfection pump. The preventive corrective action was changing the tubing location for the chemical disinfection pump further away from the sample collection point.

Maintenance Activities

Outfall 004 (north of the Industrial Landfill) was sampled on October 8, 2009 and Outfall 002 (at the Raquette River) was sampled on October 13, 2009. The analytical results for these water samples are provided in Attachment 1.

Also during the month of October, a total of approximately 33,670 gallons of water (approximately 3,940 gallons from the sump northeast of the Industrial Landfill, 7,930 gallons from the containment cell areas, and 21,800 gallons from the Process Water lagoon underdrain) were transferred to the site's WWTS for treatment.

II. Analytical Data

Analytical results received during the month of October for the Massena Superfund Site include the following:

- Table 1 – Summary of Outfall 002 Water Sampling Analytical Results.
- Table 2 – Summary of Outfall 004 Water Sampling Analytical Results.

Results are provided in the tables in Attachment 1.

III. Project Tasks Scheduled for the Coming Month (November 2009)

MLC will continue negotiations with USEPA on the remedial strategy for completing the remediation at the site. MLC also anticipates receiving approval from USEPA on the Quality Assurance Project Plan, and the Site Inspection, Monitoring, and Maintenance Plan, the Cove Remedial Action Completion Report, and the Mohawk Upland Area Remedial Action Completion Report.

Monthly Progress Report No. 210 – October 2009
Former Central Foundry Massena Superfund Site - Operable Units 1 & 2
USEPA Unilateral Administrative Orders Nos. II CERCLA - 20207 & 20215

IV. Project Status, Delays and Recovery Plans

In order to provide better visibility of submittals under review, the following table summarizes submittals made during the month, submittals responded to during the month, and submittals which continue to be under review.

<u>Submitted to EPA / NYSDEC</u>	Date
MLC letter to EPA – Response to August 20, 2009 letter and September 24, 2009 Meeting	October 1, 2009
MLC letter to NYSDEC Division of Water – Report of Noncompliance Event	October 1, 2009
MLC letter to EPA – Submittal of draft White Paper containing the Remedial Exit Strategy for the site, Schedule for remaining deliverables, and Mohawk Uplands Soil/Sediment Sampling Work Plan	October 9, 2009
<u>Previously Submitted to EPA – Pending Comment or Approval</u>	
Industrial Landfill Final Design Report, Vols. I & II	April 27, 2001
Draft Cove Remedial Action Completion Report	April 24, 2006
Draft Quality Assurance Project Plan	September 25, 2006
Draft GM Site Inspection, Monitoring, and Maintenance Plan	January 26, 2007
Mohawk Upland Area Remedial Action Completion Report	February 6, 2008
Results of 2008 Fish Collection Activities to Evaluate Fish Consumption Advisory in Remediated Cove, St. Lawrence River	December 19, 2008
St. Lawrence River Monitoring & Maintenance Annual Inspection Report	February 2, 2009
GM Response to USEPA Request for Information Letter	March 26, 2009
Revised Interim Groundwater Characterization Sampling And Analysis Report	June 10, 2009
GM Letter Report, <i>Summary of Purpose, Scope, Methods, and Results of Building Material Sampling, GM Massena Metal Castings Plant, February – April 2009</i>	July 9, 2009
<u>Comments/Approvals Received from EPA/NYSDEC during the Month</u>	
- None -	-

Monthly Progress Report No. 210 – October 2009
Former Central Foundry Massena Superfund Site - Operable Units 1 & 2
USEPA Unilateral Administrative Orders Nos. II CERCLA - 20207 & 20215

ATTACHMENT 1

Analytical Data

Table 1
Summary of Outfall 002 Water Sampling Analytical Results
Former Central Foundry Massena Superfund Site, New York

PCBs EPA 608 - Hexane Extractable EPA 413.1 - Total Suspended Solids EPA 160.2 - Metals EPA 200.7

#	Sample ID	Date Sampled	Polychlorinated Biphenyls (PCBs) EPA 608			Oil & Grease (Hexane Extractable) EPA 1664A			Total Suspended Solids (TSS) EPA 160.2			Metals USEPA 200.7			
			Detection Limit (ug/l)	Analytical Results (ug/l)	SPDES Permit Limits (ug/l)	Detection Limit (mg/l)	Analytical Results (mg/l)	SPDES Permit Limits (mg/l)	Detection Limit (mg/l)	Analytical Results (mg/l)	SPDES Permit Limits (mg/l)	Aluminum (mg/l)	SPDES Permit Limits (mg/l)	Iron (mg/l)	SPDES Permit Limits (mg/l)
1	12879	20-Oct-07	0.05	0.066	0.3	1.0	< 1.00	15	1.00	1.30	50	0.143	see note 1. below	0.206	see note 1. below
2	12916	15-Nov-07	0.05	U	0.3	1.0	< 1.00	15	1.00	1.50	50	< 0.0500	see note 1. below	0.532	see note 1. below
3	-	No sample collected during December due to frozen conditions.			-	-	-	-	-	-	-	-	-	-	-
4	12966	10-Jan-08	0.0515	U	0.3	1.0	< 1.00	15	1.00	< 1.00	50	< 0.0500	see note 1. below	< 0.0500	see note 1. below
5	12992	18-Feb-08	0.0532	U	0.3	1.0	< 1.00	15	1.00	2.80	50	0.178	see note 1. below	0.175	see note 1. below
6	13026	4-Mar-08	0.0521	U	0.3	1.0	2.90	15	1.00	< 1.00	50	0.0537	see note 1. below	< 0.0500	see note 1. below
7	13054	3-Apr-08	0.0515	U	0.3	1.0	< 1.00	15	1.00	< 1.00	50	< 0.0500	see note 1. below	< 0.0500	see note 1. below
8	13079	1-May-08	0.0515	U	0.3	1.0	< 1.00	15	1.00	< 1.00	50	< 0.0500	see note 1. below	0.147	see note 1. below
9	12941	5-Jun-08	0.0526	U	0.3	1.0	< 1.00	15	1.00	< 1.00	50	< 0.0500	see note 1. below	0.083	see note 1. below
10	13143	21-Jul-08	0.0515	0.0566	0.3	1.0	< 1.00	15	1.00	1.90	50	0.0507	see note 1. below	0.345	see note 1. below
11	13171	7-Aug-08	0.0500	U	0.3	1.0	1.30	15	1.00	5.70	50	0.8830	see note 1. below	1.23	see note 1. below
12	-	No sample collected during September due to dry conditions.			-	-	-	-	-	-	-	-	-	-	-
13	13205	27-Oct-08	0.0500	U	0.3	1.0	1.20	15	1.00	2.60	50	0.108	see note 1. below	0.242	see note 1. below
14	13258	18-Nov-08	0.0505	U	0.3	1.0	< 1.00	15	1.00	< 1.00	50	< 0.0500	see note 1. below	0.0532	see note 1. below
15	13296	2-Dec-08	0.0526	U	0.3	1.0	3.20	15	1.00	< 1.00	50	0.0560	see note 1. below	0.0600	see note 1. below
16	-	No sample collected during January due to frozen conditions.			-	-	-	-	-	-	-	-	-	-	-
17	13347	12-Feb-09	0.0532	U	0.3	1.0	6.30	15	1.00	4.30	50	1.12	see note 1. below	1.16	see note 1. below
18	13382	12-Mar-09	0.0515	U	0.3	1.00	< 1.00	15	1.00	< 1.00	50	0.0646	see note 1. below	0.130	see note 1. below
19	13406	2-Apr-09	0.0515	U	0.3	1.00	< 1.00	15	1.00	< 1.00	50	< 0.0500	see note 1. below	0.217	see note 1. below
20	13433	21-May-09	0.0510	U	0.3	1.00	< 1.00	15	1.00	< 1.00	50	< 0.0500	see note 1. below	0.0848	see note 1. below
21	-	No stormwater runoff at Outfall when checked			-	-	-	-	-	-	-	-	-	-	-
22	13529	6-Aug-09	0.0515	U	0.3	1.00	< 1.00	15	1.00	2.00	50	0.0748	see note 1. below	0.2340	see note 1. below
23	13564	15-Sep-09	0.0521	U	0.3	1.00	< 1.00	15	1.00	< 1.00	50	< 0.0500	see note 1. below	0.0885	see note 1. below
24	13598	8-Oct-09	0.0520	U	0.3	1.00	2.30	15	1.00	< 1.00	50	< 0.0500	see note 1. below	0.1430	see note 1. below

Notes:.

- 1). There is no effluent limit on metals for the SPDES Permit.
- 2). Analyses performed by Analytics Corporation, Inc.

Table 2
Summary of Outfall 004 Water Sampling Analytical Results
Former Central Foundry Massena Superfund Site, New York

PCBs EPA 608 - Hexane Extractable EPA 1664A - Total Suspended Solids EPA 160.2 - Metals EPA 200.7

#	Sample ID	Date Sampled	Polychlorinated Biphenyls (PCBs) EPA 608			Oil & Grease (Hexane Extractable) EPA 1664A			Total Suspended Solids (TSS) EPA 160.2			Metals USEPA 200.7				
			Detection Limit (ug/l)	Analytical Results (ug/l)	SPDES Permit Limits (ug/l)	Detection Limit (mg/l)	Analytical Results (mg/l)	SPDES Permit Limits (mg/l)	Detection Limit (mg/l)	Analytical Results (mg/l)	SPDES Permit Limits (mg/l)	Aluminum (mg/l)	SPDES Permit Limits (mg/l)	Iron (mg/l)	SPDES Permit Limits (mg/l)	
1	12880	20-Oct-07	0.0510	0.0694	0.3	1.00	< 1.00	15	1.00	1.80	50	0.0527	see note 1. below	0.627	see note 1. below	
2	12917	06-Nov-07	0.0510	U	0.3	1.00	2.5	15	1.00	6.20	50	< 0.0500	see note 1. below	1.80	see note 1. below	
3	-	No sample collected during December due to frozen conditions.					-	-	-	-	-	-	-	-	-	-
4	12967	10-Jan-08	0.0510	U	0.3	1.0	< 1.00	15	1.00	< 1.00	50	< 0.0500	see note 1. below	0.167	see note 1. below	
5	12993	18-Feb-08	0.0510	U	0.3	1.0	< 1.00	15	1.00	2.60	50	0.105	see note 1. below	0.178	see note 1. below	
6	13027	04-Mar-08	0.0505	U	0.3	1.0	3.70	15	1.00	1.40	50	0.110	see note 1. below	0.140	see note 1. below	
7	13055	03-Apr-08	0.0505	U	0.3	1.0	< 1.00	15	1.00	< 1.00	50	< 0.0500	see note 1. below	0.135	see note 1. below	
8	13080	01-May-08	0.0510	U	0.3	1.0	2.10	15	1.00	1.60	50	< 0.0500	see note 1. below	0.630	see note 1. below	
9	12942	05-Jun-08	0.0532	U	0.3	1.0	< 1.00	15	1.00	1.20	50	< 0.0500	see note 1. below	0.724	see note 1. below	
10	13144	01-Jul-08	0.0543	U	0.3	1.0	< 1.00	15	1.00	17.80	50	< 0.0500	see note 1. below	7.10	see note 1. below	
11	13172	04-Aug-08	0.0510	U	0.3	1.0	1.10	15	1.00	7.70	50	< 0.0500	see note 1. below	2.580	see note 1. below	
12	13206	09-Sep-08	0.0510	U	0.3	1.0	< 1.00	15	1.00	24.70	50	0.0655	see note 1. below	1.730	see note 1. below	
13	13231	09-Oct-08	0.0510	U	0.3	1.0	< 1.00	15	1.00	7.60	50	< 0.0500	see note 1. below	3.51	see note 1. below	
14	13259	18-Nov-08	0.0515	U	0.3	1.0	< 1.00	15	1.00	< 1.00	50	< 0.0500	see note 1. below	0.380	see note 1. below	
15	13297	02-Dec-08	0.0515	U	0.3	1.0	< 1.00	15	1.00	< 1.00	50	< 0.0500	see note 1. below	0.244	see note 1. below	
16	-	No sample collected during January due to frozen conditions.					-	-	-	-	-	-	-	-	-	-
17	13348	02-Feb-09	0.0500	U	0.3	1.0	2.30	15	1.00	1.60	50	0.130	see note 1. below	0.152	see note 1. below	
18	13383	11-Mar-09	0.0500	U	0.3	1.0	< 1.00	15	1.00	4.40	50	0.129	see note 1. below	0.177	see note 1. below	
19	13407	02-Apr-09	0.0510	U	0.3	1.0	< 1.00	15	1.00	< 1.00	50	< 0.0500	see note 1. below	0.311	see note 1. below	
20	13434	21-May-09	0.0521	U	0.3	1.0	< 1.00	15	1.00	5.70	50	< 0.0500	see note 1. below	2.75	see note 1. below	
21	13469	30-Jun-09	0.0515	U	0.3	1.0	< 1.00	15	1.00	28.50	50	< 0.0500	see note 1. below	10.80	see note 1. below	
22	13530	06-Aug-09	0.0510	U	0.3	1.0	< 1.00	15	1.00	12.60	50	< 0.0500	see note 1. below	4.74	see note 1. below	
23	13565	15-Sep-09	0.0521	U	0.3	1.0	2.30	15	1.00	4.40	50	< 0.0500	see note 1. below	7.59	see note 1. below	
24	13599	13-Oct-09	0.0510	U	0.3	1.0	< 1.00	15	1.00	7.80	50	< 0.0500	see note 1. below	3.44	see note 1. below	

Notes:

- 1). There is no effluent limit on metals for the SPDES Permit.
- 2). Analyses performed by Analytics Corporation, Inc.

Massena Remediation Program Report Distribution List

1 copy (excluding plans or reports):

Chief, New York/Caribbean Superfund Branch
Office of Regional Counsel
U.S. Environmental Protection Agency, Region II
290 Broadway, 20th Floor
New York, New York 10007-1866
Attention: GM/Massena Superfund Site Attorney

2 copies (or 5 copies if plan or report):

Emergency and Remedial Response Division
U.S. Environmental Protection Agency, Region II
290 Broadway, 20th Floor
New York, New York 10007-1866
Attention: Anne Kelly

2 copies (or 3 if plan or report):

Mr. Ken Jock
Environmental Director
St. Regis Mohawk Tribe
412 State Route 37
Akwesasne, NY 13655

for Federal Express Packages:
SRMT Environmental Division
449 Frogtown Road
Akwesasne, NY 13655

3 copies (or 3 copies if plan or report):

New York State Department of Environmental Conservation
317 Washington Street
Watertown, New York 13601-3787
Attention: Regional Hazardous Waste Engineer – Peter Taylor, P.E.
Peter S. Ouder Kirk, P.E. (1 copy)
Lincoln Fancher, Project Geologist (1 copy)

1 copy:

Wendy S. Keuhner, P.E.
New York State Department of Health
Flanigan Square, Room 300
547 River Street
Troy, New York 12180

1 copy:

Jim Harrington
New York State Department of Environmental Conservation
Bureau of Watershed Compliance Programs
625 Broadway, 4th Floor
Albany, New York 12233-3506

Massena Remediation Program Report Distribution List

All Reports and Government Correspondence:

James M. Redwine, Esq.

Motors Liquidation Company
500 Renaissance Dr., Suite 1400
Detroit, MI 48243
Phone: (214) 906-2146

Scott Haeger

Motors Liquidation Company
500 Renaissance Dr., Suite 1400
Detroit, MI 48243
Phone: (312) 206-9574

Raymond M. Kapp

ARCADIS
One International Boulevard, Suite 406
Mahwah, New Jersey 07495
Phone: 201-684-1410
Fax: 201-684-1420

Richard G. Boelter

ARCADIS
c/o GM Powertrain
Route 37 East, Box 460
Massena, NY 13662
Phone: 315-764-2299