



March 16, 2007

U.S.EPA Region 5
Waste Pesticides and Toxics Division, DE-9J
77 West Jackson Blvd.
Chicago, IL 60604-3590
Attn: Ms. Mirtha Capiro

RE: General Motors Corporation - Moraine, Ohio
Revised Supplemental Groundwater Investigation Work Plan

Dear Ms. Capiro:

On behalf of General Motors Corporation (GM), BOW Environmental Solutions, Inc. is submitting a Revised Supplemental Groundwater Investigation Work Plan for the Former Delphi Harrison Thermal Systems, General Motors Truck Group Moraine Assembly Plant, and the former General Motors Powertrain Group Moraine Engine Plant in Moraine, Ohio. In 2006, GM collected supplemental groundwater data to provide additional information for evaluating the performance of the ongoing corrective measures. The results of this supplemental data collection, which have been used to refine the corrective measures for the site, were presented in the Corrective Measures Supplemental Groundwater Investigation Report submitted to U.S. EPA on February 28, 2007. In the February 28, 2007 report, GM recommended additional data collection to further supplement the evaluation of current site conditions and to more effectively manage the final corrective measures. This proposed work will allow for refinements of the final corrective measures and monitoring program but is not expected to alter the overall approach for corrective measures at the site. The proposed additional data collection activities are described below.

DN-13 Area Detailed Water Level Study

A transducer study to further refine the available information on groundwater fluctuations and any potential interconnections between the upper and lower aquifers in the area of lower aquifer well DN-13 will be completed in March and April 2007. The scope for this study was presented in the Supplemental Groundwater Investigation DN-13 Area Detailed Water Level Study Work Plan, submitted to the U.S. EPA on January 15, 2007. This plan has been modified to add transducers in wells DN-13, GM-16, and GM-53 and to extend the study two additional weeks to collect measurements to assess non-pumping conditions prior to restarting DN-13 and to account for any possible scheduling delays associated with DN-13 well repairs which are currently being performed by GM. The revised transducer locations are: DN-13, GM-13, GM-14, GM-18, GM-15, GM-16, GM-51, GM-53, and GM-41.

Holes Creek Study Area

Due to delay in obtaining property access agreements from the Miami Conservancy District, proposed Well G identified in the work plan dated July 2006, was not installed in 2006. This well will be installed in the same proposed location east of the Great Miami River and south of Holes Creek. This well, now referred to as GM-65, will be installed in the location shown on Figure 1. Well GM-65 will be drilled to an approximate depth of 75 feet below land surface (ft bls) using rotosonic methodology and continuously sampled for lithologic characterization, including vertical aquifer profiling for the upper aquifer (approximately every 10-15 ft once the water table is reached). The groundwater samples will be submitted for expedited laboratory analysis of the site-specific parameter list. Upon evaluation of the groundwater profiling data, an upper aquifer well will be installed. The well screen interval will be determined using the profiling data.

RZ-1 Performance Monitoring

To monitor performance of the RZ-1 barrier at a location further downgradient to the southwest, GM will install an additional upper aquifer monitoring well. The proposed location of GM-66 (Figure 1) will be in proximity to BD14-01, a former temporary well installed during the 2004 Building 14 investigation. Well GM-66 will be drilled to an approximate depth of 60 ft bls using rotosonic methodology and continuously sampled for lithologic characterization, including vertical aquifer profiling for the upper aquifer (approximately every 10-15 ft once the water table is reached). The groundwater samples will be submitted for expedited laboratory analysis of the site-specific parameter list. Upon evaluation of the groundwater profiling data, an upper aquifer well will be installed. The well screen interval will be determined using the profiling data.

GM-41 Study Area

Additional characterization of groundwater chemistry and flow direction to the northwest, southwest, and northeast of lower aquifer well GM-41 will be conducted. GM will evaluate five areas in the vicinity of GM-41 (Figure 1). The boring locations are approximate and may be modified based on utility clearance and plant operations. The borings will be drilled using rotosonic methodology and continuously sampled for lithologic characterization. During drilling, vertical aquifer sampling will be conducted to provide an understanding of the VOC concentration profile. This data will be considered as screening quality and will be used to determine whether to install the well as discussed below.

- Well GM-67 will be located between the Former Oil House Area and wells GM-59/-60/-61 to further refine the current understanding of the geology and groundwater chemistry between the Former Oil House Area and GM-41. Proposed Well GM-67 will be drilled to a minimum depth of 120 ft bls, including vertical aquifer profiling for both the upper and lower aquifers (approximately every 10-15 ft once the water table is reached). The groundwater samples will be submitted for expedited laboratory analysis of the site-specific parameter list. Upon evaluation of the groundwater profiling data, a shallow and/or deep well may be installed.

- Well GM-68 will be located between wells GM-59/-60/-61 and GM-41 to further refine the current understanding of the geology and groundwater chemistry northwest of GM-41. Proposed Well GM-68 will be drilled to a minimum depth of 120 ft bls, including vertical aquifer profiling for both the upper and lower aquifers (approximately every 10-15 ft once the water table is reached). The groundwater samples will be submitted for expedited laboratory analysis of the site-specific parameter list. Upon evaluation of the groundwater profiling data, a shallow and/or deep well may be installed.
- Well GM-69 will be located southwest of GM-41 to further refine the current understanding of the geology and groundwater chemistry southwest and downgradient of GM-41. Proposed Well GM-69 will be drilled to a minimum depth of 120 ft bls, including vertical aquifer profiling for both the upper and lower aquifers (approximately every 10-15 ft once the water table is reached). The groundwater samples will be submitted for expedited laboratory analysis of the site-specific parameter list. Upon evaluation of the groundwater profiling data, a shallow and/or deep well may be installed.
- Well GM-70 will be located northeast of GM-41 to further refine the current understanding of the geology and groundwater chemistry northeast and upgradient of GM-41. Proposed Well GM-70 will be drilled to a minimum depth of 120 ft bls, including vertical aquifer profiling for both the upper and lower aquifers (approximately every 10-15 ft once the water table is reached). The groundwater samples will be submitted for expedited laboratory analysis of the site-specific parameter list. Upon evaluation of the groundwater profiling data, a shallow and/or deep well may be installed.
- Well GM-71 will be located north of GM-41 to further refine the current understanding of the geology and groundwater chemistry north of GM-41. Proposed Well GM-71 will be drilled to a minimum depth of 120 ft bls, including vertical aquifer profiling for both the upper and lower aquifers (approximately every 10-15 ft once the water table is reached). The groundwater samples will be submitted for expedited laboratory analysis of the site-specific parameter list. Upon evaluation of the groundwater profiling data, a shallow and/or deep well may be installed. Due to the proposed location of this well within the southern end of the Moraine Assembly Plant and access issues during active production, installation of this well will be delayed until the scheduled two week plant shut down in July 2007.

The newly installed wells will be developed and surveyed following procedures defined in the Supplemental RFI Work Plan (ARCADIS 1997). Following completion of well installation (except GM-71 which will be delayed until July 2007) and the transducer study, a site-wide round of water level measurements will be conducted. The new wells will be sampled following procedures defined in the Site-Wide Groundwater Monitoring Plan (ARCADIS 2002). The groundwater samples will be submitted for laboratory analysis of the site-specific VOC parameter list.

Data Report

The data generated from these supplemental investigation activities will be used to evaluate groundwater chemistry and flow direction in the vicinity of Holes Creek, south of RZ-1, and in the general area around GM-41 to better assess the current corrective measures. The data report may include a recommendation to add some of these new wells in the site-wide groundwater monitoring program. GM will incorporate these data into a letter report that will be submitted to U.S. EPA. The data evaluation will include the results of the transducer study, boring logs, groundwater contour maps, tabulated analytical results, analytical results posted in databoxes on figures, and an assessment of how these supplemental data can be used to further optimize the overall performance of the final corrective measures, if at all.

GM will proceed with the field work portion of this proposed work plan when permits and access agreements are finalized. The drilling is scheduled to begin the week of March 26, 2007 to mid-April 2007. Please call 937-455-2636, if you have any questions.

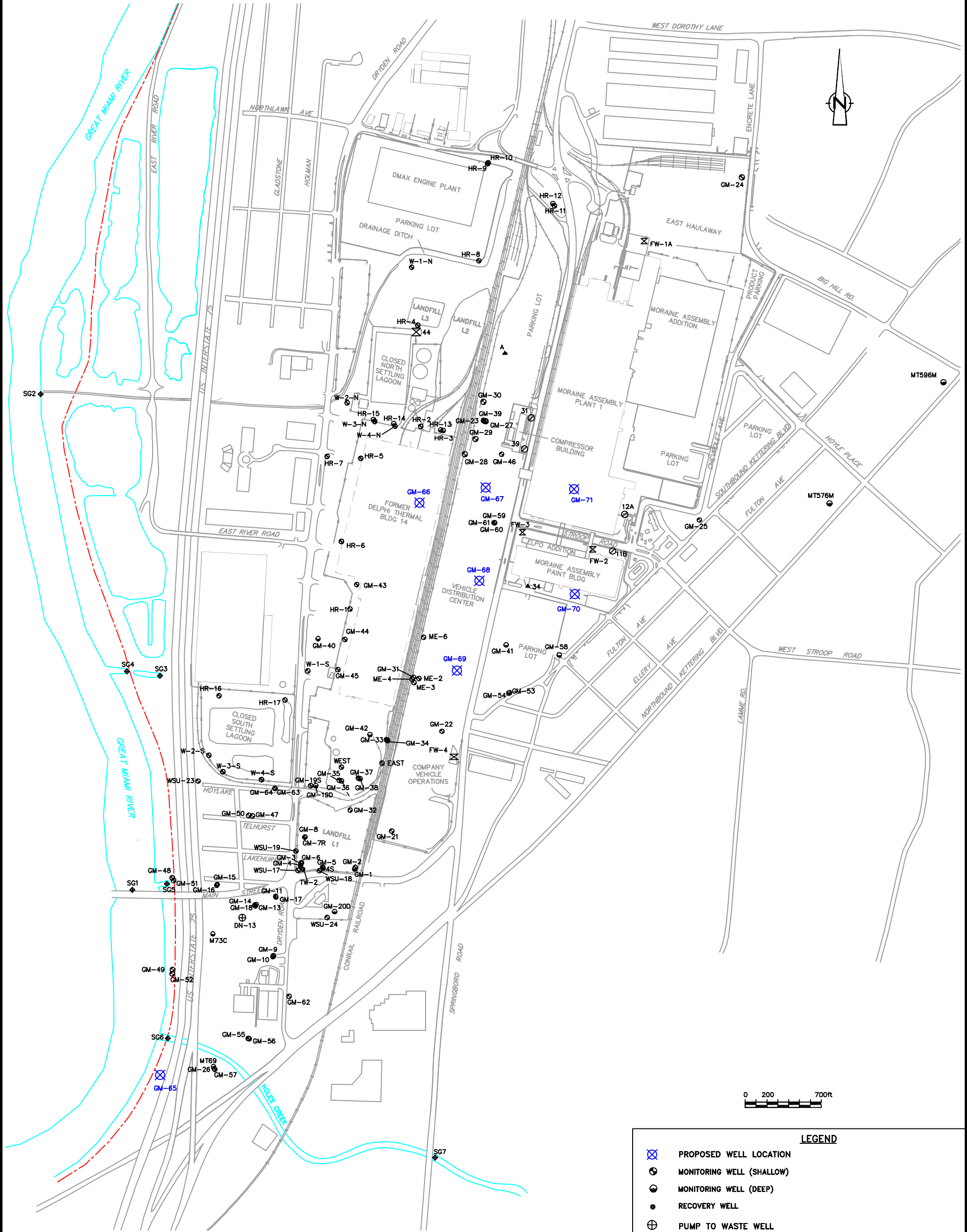
Sincerely,

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 GM

cc: H. O'Connell, Ohio EPA
J. Caufield, GM Remediation

User Name : bsmith Date\Time : Fri, 16 Mar 2007 - 12:09pm Path\Name : G:\DRAWINGS\HARRISON\CRA-DWG\2007\OH29407-04.dwg Layout Tab: Model



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Dublin, OH 43017
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LOCATION OF PROPOSED SUPPLEMENTAL INVESTIGATION
WELLS
GENERAL MOTORS CORPORATION
MORAIN, OHIO

DATE 3/8/2007	PROJECT MANAGER N. GILLOTTI	DRAWING NAME CRA/07/OH29407-04
DRAWN R. SMITH	LEAD DESIGN PROF. J. REID	CHECKED N. GILLOTTI
PROJECT NUMBER OH000294.0009.003		FIGURE NUMBER 1