

**From:** Patricia Brandt  
**To:** James Innes  
**Date:** 1/28/04 3:41PM  
**Subject:** Re: RAP Question

The RAP can be modified with an addendum for this. The modification will have to be compliant with the current rule provisions, and that may mean some areas of the existing RAP might need revision. We have agreed to modify one other approved RAP and it does get complicated with trying to hold the only the modification to the new rules. But in that instance we accepted pre-methonal preservation soil sampling because the modification was to the groundwater remediation. Because this is off-site it will need to evaluate all pathways, and that may complicate things if the we don't know enough about off-site soils? As I described this to Lynelle (what I get for walking down the hall without your note) she cautioned that the consideration of the necessity and appropriateness of a waiver (sounds like expanding plume) be raised with GM early. (and they would need to identify well head protection zones)

>>> James Innes 01/27/04 11:50AM >>>  
Patti,

Attached you will find a rather crude visual aid that may help explain my question.

In the late 90's we granted GM a limited closure on the Linden Road Landfill site in Genesee County. The site was mostly soils impacted with industrial waste, with some shallow groundwater contamination. One of the requirements under the closure was for GM to monitor shallow groundwater at the site boundary. In 2001 the groundwater in a well located in the SE corner of the site started showing low levels of VC. Historically GW flows off site at this location. GM recently completed an investigation to define the off site extent of shallow groundwater impacted with VC. GM owns and is currently trying to sell Parcel 1.

**QUESTION:** Can the migrated contamination be addressed through an addendum to the Linden Road Landfill RAP (IE a deed restriction on GW use on Parcel 1), or will Parcel 1 require it's own RAP?

Any information or advice you have will be greatly appreciated. Thanks

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**CC:** Kathleen Shirey

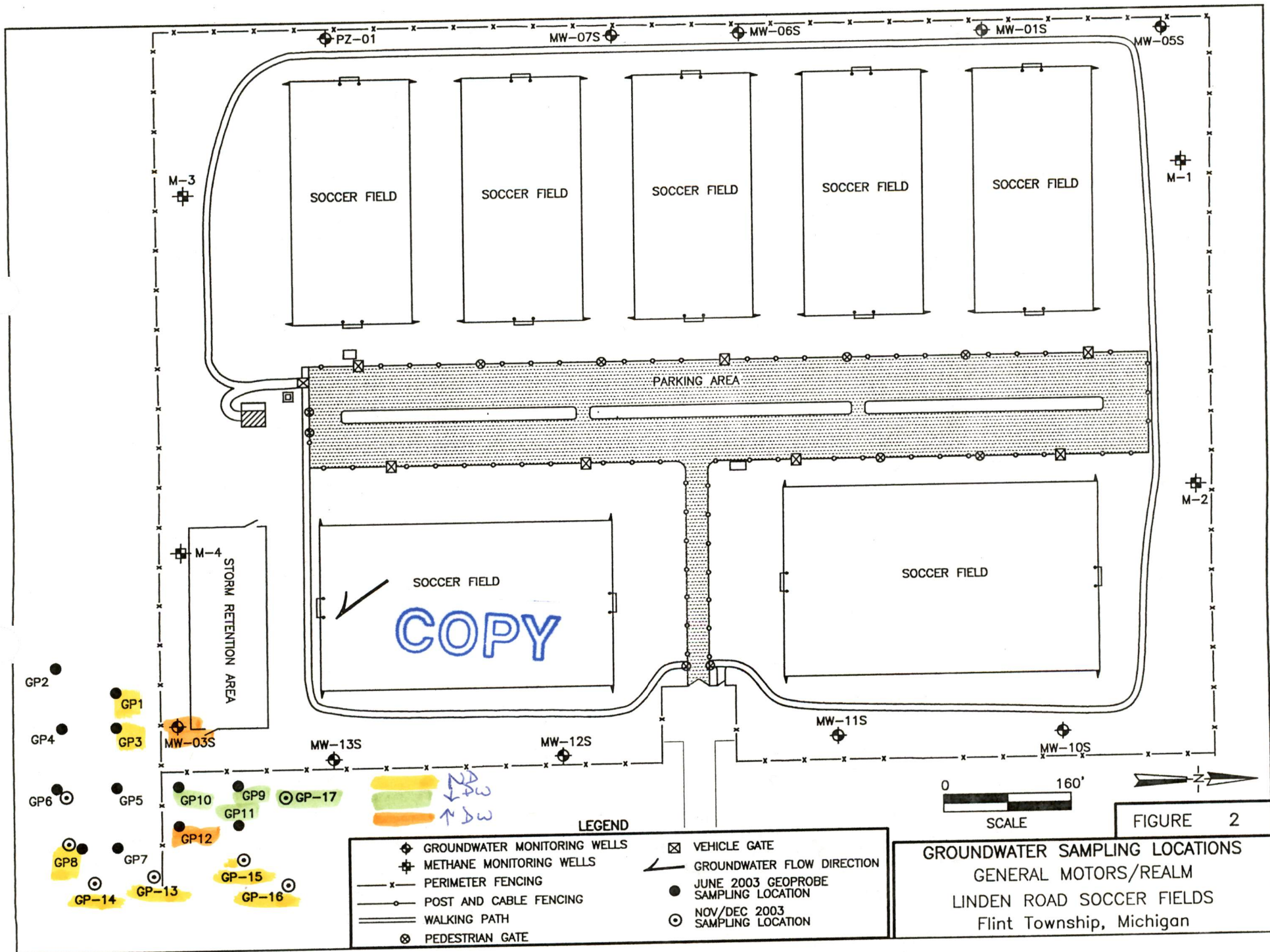


FIGURE 2

GROUNDWATER SAMPLING LOCATIONS  
 GENERAL MOTORS/REALM  
 LINDEN ROAD SOCCER FIELDS  
 Flint Township, Michigan

LEGEND	
◆	GROUNDWATER MONITORING WELLS
⊕	METHANE MONITORING WELLS
—x—	PERIMETER FENCING
—o—	POST AND CABLE FENCING
—	WALKING PATH
⊗	PEDESTRIAN GATE
⊠	VEHICLE GATE
↙	GROUNDWATER FLOW DIRECTION
●	JUNE 2003 GEOPROBE SAMPLING LOCATION
⊙	NOV/DEC 2003 SAMPLING LOCATION