



**Worldwide Facilities Group  
Remediation Team**

January 8, 2009

Mr. Nate Nemani  
Project Coordinator for MID 041 793 340  
RCRA Enforcement Branch (DE-9J)  
U.S. EPA, Region 5  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

RE: GMC Powertrain Saginaw Metal Casting Operations, MID-041-793-340  
RCRA Facility Investigation  
Monthly Progress Report for the Month of December 2008

Dear Mr. Nemani:

Enclosed please find two copies of the Monthly Progress Report for the month of December 2008 for the RCRA Facility Investigation (RFI) at the GMC Powertrain Saginaw Metal Casting Operations (SMCO) Facility, MID-041-793-340, in Saginaw, Michigan.

Please call me at 313-510-4328 if you have any questions regarding this report.

Sincerely,


A handwritten signature in black ink that reads 'Cheryl R. Hiatt'.

Cheryl R. Hiatt  
Project Coordinator for General Motors

cc: Mr. Peter Ramanauskas, U. S. EPA  
Mr. George Bruchmann, MDEQ-WMD Lansing  
Mr. Terry Walkington, MDEQ-WMD Bay City  
Ms. Rhonda Klann, MDEQ-RRD Bay City  
Dr. Lisa Williams, U.S. DOI, Fish and Wildlife  
Ms. Jean Caufield, GM  
Mr. Tony Thrubis, GM  
Ms. Amanda Kurzman/ Mr. Ray Ilkka, GM  
Mr. Mike Tomka, CRA

Mr. Nate Nemani  
January 8, 2009  
Page 2

"I certify that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Signature:   
Name: Cheryl R. Hiatt  
Title: Project Coordinator  
Date: January 8, 2009

**GENERAL MOTORS CORPORATION**

**SAGINAW METAL CASTING OPERATIONS  
WASHINGTON AVENUE AND VETERANS MEMORIAL PARKWAY  
SAGINAW, MICHIGAN  
EPA ID #MID041793340**

**RCRA FACILITY INVESTIGATION**

**MONTHLY PROGRESS REPORT**

**January 8, 2009**

**CONESTOGA-ROVERS & ASSOCIATES  
8615 WEST BRYN MAWR AVENUE  
CHICAGO, ILLINOIS 60631  
PHONE: (773) 380-9933  
FAX NO.: (773) 380-6421**

**CERTIFICATION STATEMENT**

"I certify that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

**SEE ATTACHED CERTIFICATION LETTER**

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Cheryl R. Hiatt  
GM Remediation Project Coordinator

Date

General Motors Corporation  
Worldwide Facilities Group  
Remediation Team

**DISTRIBUTION LIST**

<b>U.S. EPA RCRA Enforcement Branch, Project Coordinator</b>	Nate Nemani
<b>MDEQ Waste Management Division, Chief</b>	George Bruchmann
<b>MDEQ Waste Management Division, District Supervisor</b>	Terry Walkington
<b>MDEQ Remediation and Redevelopment</b>	Rhonda Klann
<b>USDOJ, East Lansing Field Office</b>	Dr. Lisa Williams
<b>GM Remediation Project Coordinator</b>	Cheryl R. Hiatt
<b>GM SMC Environmental Dept.</b>	Ray Ilkka
<b>GM Legal Counsel</b>	James Walle
<b>CRA Project Manager</b>	William K. Steinmann, CPG
<b>CRA Document Coordinator</b>	Rosanne Cadetto
<b>Exponent</b>	Pieter Booth
<b>ENVIRON International Corporation, Inc.</b>	Stephen Song, Ph.D.

**LIST OF ATTACHMENTS**

**Attachment A – City of Saginaw Consent Order – November 2008 Monthly Report, GM Saginaw Metal Casting Operations, Saginaw, Michigan**

## **1.0 INTRODUCTION**

This Monthly Progress Report is submitted in accordance with the RCRA Section 3008(h) Unilateral Administrative Order (U.S. EPA Docket No. V-W-003-95) issued to General Motors Corporation, July 9, 1995 (effective August 9, 1995).

The next monthly progress report will be submitted on or before February 10, 2009.

## **2.0 DESCRIPTION AND ESTIMATE OF THE PERCENTAGE OF THE RFI COMPLETED**

Each of the submissions identified in the Order has been submitted on or before its due date. The following is a list of those submissions and the date submitted.

- Designation of GM's Project Manager and Project Consultant - July 7, 1995.
- Description of Current Conditions (DOCC) Report (Task I) - August 22, 1995.
- Notification of Laboratories to be used for the RFI - September 6, 1995.
- Supplemental data submission package - October 6, 1995.
- Pre-Investigation Evaluation of Corrective Measure Technologies (Task II) - October 6, 1995.
- RFI Workplan (Task III) for Phase 1 - November 3, 1995.
- Addendum to the DOCC - October 10, 1997. Technical Memorandum: Saginaw River Sediment Chemistry in the Vicinity of the Saginaw Metals Casting Operations - March 13, 1998, Revised: December 17, 1998.
- RFI Workplan (Task III) for Phase IA - Revision 2, June 9, 1998 (Approved June 30, 1998).
- Addendum to the June 1998 (Revision 2) Phase 1A RCRA Facility Investigation Workplan, Saginaw Metal Casting Operations, Saginaw, Michigan, December 9, 1998.
- Addendum to the Description of Current Conditions Report, Area West of 6th Street, January 14, 1999.
- Phase 1A RCRA Facility Investigation (RFI) Report and Phase 1B RFI Workplan, June 7, 1999 and April 19, 2000.
- Amendment to the June 1999 Phase 1A RCRA Facility Investigation (RFI) Report and Phase 1B RFI Workplan, June 4, 2001.
- RFI Phase 1B Amendment No. 2 to the April 19, 2000 Phase 1A RFI Report and Phase 1B RFI Work Plan, August 21, 2002.
- Environmental Indicators Report, September 17, 2003.
- RFI Phase 1C Investigation Work Plan, December 9, 2004.
- Interim Measures Work Plan for PCB-Impacted Areas, December 9, 2004.

- Interim Measures Work Plan for LNAPL-Impacted Soil in IU B, December 9, 2004.
- Amendment to the Interim Measures Work Plan for PCB-Impacted Areas, January 21, 2006.
- Amendment to Interim Measures Work Plan for LNAPL-Impacted Soil in IU B, January 21, 2006.
- Interim Measures Completion Report for PCB-Impacted Soil, August 9, 2006.
- RCRA Facility Investigation – Phase 1C Report, January 5, 2007.
- RCRA Facility Investigation – Phase 1C Report – Revised, March 9, 2007.

GM currently estimates that all of the RFI field work has been completed.

### **3.0 SUMMARIES OF ALL FINDINGS**

GM has continued sewer investigation activities as part of a Consent Order with the City of Saginaw. The Consent Order currently requires the submittal of monthly reports detailing the sampling of Outfall 008 and any cleaning activities that took place during the previous month. The Monthly Report (November 1 – November 30, 2008) is presented in Attachment A.

No LNAPL excavation as described in the original IM work plan will be completed at this time as the monitoring of MW-00305, MW-00304, MW-00303, MW-00304A, MW-00304B and MW-00305A reported no measurable LNAPL on December 10, 2008. GM believes that agreement has been reached with U.S. EPA and MDEQ to no longer require the excavation in the LNAPL area and is anticipating written confirmation that this issue has been resolved and monthly monitoring is no longer required.

GM conducted the annual Environmental Indicators (EI) monitoring during the week of November 3, 2008 with the exception of well MW-02432 which required replacement and could not be sampled sooner than 2-weeks after development. MW-02432 was sampled as part of the EI monitoring in December 2008.

### **4.0 SUMMARIES OF ALL CHANGES MADE IN THE RFI DURING THE REPORTING PERIOD**

No changes occurred during the reporting period.

### **5.0 SUMMARIES OF ALL CONTACTS WITH REPRESENTATIVES OF LOCAL COMMUNITY, PUBLIC INTEREST GROUPS OR STATE GOVERNMENT DURING THE REPORTING PERIOD**

GM has continued monthly sampling of sewer outfall 008 as part of the Consent Order with the City of Saginaw regarding compliance of the wastewater discharge at Outfall 008. GM submitted the monthly

report (November 1 – November 30, 2008) (Attachment A) to the City in accordance with the Consent Order.

**6.0 SUMMARIES OF ALL PROBLEMS OR POTENTIAL PROBLEMS  
ENCOUNTERED DURING THE REPORTING PERIOD**

Excavation of soil in the area of LNAPL has not been completed and GM has requested that the original IM work plan be withdrawn. Based on discussions with U.S. EPA on November 24, 2008, GM understands that U.S. EPA will be issuing a letter accepting GM's withdrawal request.

**7.0 ACTIONS BEING TAKEN TO RECTIFY PROBLEMS**

GM submitted a request to withdraw the LNAPL IM Work Plan and U.S. EPA is reviewing the request. Based on discussions with U.S. EPA on November 24, 2008, GM understands that U.S. EPA will be issuing a letter accepting GM's withdrawal request.

**8.0 CHANGES IN PERSONNEL DURING THE REPORTING PERIOD**

The position formerly held by Mr. Tony Thrubis at the GM Legal Counsel was assigned to Mr. James Walle.

**9.0 PROJECTED WORK FOR THE NEXT REPORTING PERIOD**

The next monthly progress report will be completed by February 10, 2009.

A monthly telephone update between U.S. EPA and GM is scheduled for January 22, 2009.

GM will submit an IM work plan to address pH impacted soil in IU I.

**10.0 COPIES OF DAILY REPORTS, INSPECTION REPORTS,  
LABORATORY/MONITORING DATA**

Attachment A – City of Saginaw Consent Order – November 2008 Monthly Report, GM Saginaw Metal Casting Operations, Saginaw, Michigan

ATTACHMENT A

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## MONTHLY REPORT

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TO: Jason Casteel, City of Saginaw REF. NO.: GM008 -11-2008

FROM: Renee Mietz, GMPT SMCO DATE: December 8, 2008

C.C.: Jeanette Best, City of Saginaw  
Amanda Kurzman, GM Cheryl Hiatt, GM  
Anthony Thrubis, GM Ray Ilkka, GM  
Dave Kwasny, GM Mike Tomka, CRA

RE: **March 24, 2006 Consent Order revised by Addendum dated December 10, 2007:  
Monthly Report - Sewer Investigation - November 1 to November 30, 2008  
GM Saginaw Metal Casting Operations, Saginaw, Michigan**

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This Monthly Report presents a summary of work completed from November 1 to November 30, 2008.

1. **Summary of Activities Completed During November 1 to November 30, 2008 Under Significant Industrial User Permit #2004-11**
  - No additional activities were completed during this reporting period.
2. **Summary of Activities Completed During November 1 to November 30, 2008 (per March 24, 2006 Consent Order, Section 8.a)**
  - Sampling of Outfall on November 12, 2008
3. **Summary of Activities Completed During November 1 to November 30, 2008 (per March 24, 2006 Consent Order, Section 8.b)**
  - Cleaned out sediment in Sump prior to Outfall 008 on November 3, and 17, 2008
  - Disposal of Sediment removal water on October 31, 2008
4. **Summary of Activities Scheduled for the next Month (December, 2008)**
  - Monthly sampling at Outfall 008 for PCBs
  - Sediment removal at Outfall 008.
5. **Other Information**
  - December Holiday Shutdown from 12-19-08 to 1-5-09

TABLE 1

ANALYTICAL DATA SUMMARY  
PCB 24-HOUR COMPOSITE WATER SAMPLING  
AT OUTFALL 008  
November 2008  
GMPT - SAGINAW METAL CASTING OPERATIONS  
SAGINAW, MICHIGAN

<i>Sample Date:</i>	<i>Daily Outfall 008 Flow Gal</i>	<i>Aroclor-1016 (PCB-1016) µg/L</i>	<i>Aroclor-1016 (PCB-1028) µg/L</i>	<i>Aroclor-1232 (PCB-1232) µg/L</i>	<i>Aroclor-1242 (PCB-1242) µg/L</i>	<i>Aroclor-1248 (PCB-1248) µg/L</i>	<i>Aroclor-1254 (PCB-1254) µg/L</i>	<i>Aroclor-1260 (PCB-1260) µg/L</i>	<i>Total PCBs µg/L</i>
11/12/2008		ND (0.1)	ND (0.1)	ND (0.1)	ND (0.1)	ND (0.1)	ND (0.1)	ND (0.1)	ND (0.1)

\*No Flow Recorded due to malfunctioning flow meter

TABLE 2

ANALYTICAL DATA SUMMARY  
PCB Grab Split Sample  
Sediment Evacuation Water from OUTFALL 008  
November 2008  
GMPT - SAGINAW METAL CASTING OPERATIONS  
SAGINAW, MICHIGAN

<i>Sample Date:</i>	<i>Sample Container Number</i>	<i>Aroclor-1016 (PCB-1016) µg/L</i>	<i>Aroclor-1016 (PCB-1028) µg/L</i>	<i>Aroclor-1232 (PCB-1232) µg/L</i>	<i>Aroclor-1242 (PCB-1242) µg/L</i>	<i>Aroclor-1248 (PCB-1248) µg/L</i>	<i>Aroclor-1254 (PCB-1254) µg/L</i>	<i>Aroclor-1260 (PCB-1260) µg/L</i>	<i>Total PCBs µg/L</i>
Samples Taken									
10/30/2008	08-013	ND (0.1)	ND (0.1)	ND (0.1)	ND (0.1)	ND (0.1)	ND (0.1)	ND (0.1)	ND (0.1)
10/30/2008	08-014	ND (0.1)	ND (0.1)	ND (0.1)	0.9	ND (0.1)	ND (0.1)	ND (0.1)	0.9
10/30/2008	08-015	ND (0.1)	ND (0.1)	ND (0.1)	ND (0.1)	ND (0.1)	ND (0.1)	ND (0.1)	ND (0.1)
10/30/2008	08-016	ND (0.1)	ND (0.1)	ND (0.1)	0.6	ND (0.1)	ND (0.1)	ND (0.1)	0.6
10/30/2008	08-017	ND (0.1)	ND (0.1)	ND (0.1)	2	ND (0.1)	ND (0.1)	ND (0.1)	2
10/30/2008	08-018	ND (0.1)	ND (0.1)	ND (0.1)	2.7	ND (0.1)	ND (0.1)	ND (0.1)	2.7

Discharged sediment cleanout totes to GM Oil & Water Separator