



THREE HAWTHORN PARKWAY
VERNON HILLS, ILLINOIS 60061
PHONE: 708-918-4000

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Region III Headquarters

26 November 1990

Mr. Ben Hall
Environmental Response Division
Michigan Department of Natural Resources
Region III Headquarters
P.O. Box 30028
Lansing, Michigan 48909

Subject: Linden Road Landfill Site
Investigation and Interim
Remedial Measures Evaluation
Flint, Michigan

Dear Mr. Hall:

Roy F. Weston, Inc. (WESTON) has been contracted by General Motors AC Rochester Division to perform a site investigation and interim remedial measures evaluation (IRME) at the Linden Road Landfill Site located in Flint Township, Michigan. AC Rochester requested WESTON to contact you and clarify certain items related to the above mentioned project, identified by you in a letter dated 10 October 1990, to Mr. Richard Eisenman of AC Rochester. Since you were away from your office during the last two weeks and we planned to commence investigations at the site during the week of 26 November 1990, we discussed the project issues with Ms. Jean Hights of your department on 19 November 1990. This letter is to document our conversation with Ms. Jean Hights and, also to document a correction on Table 3-1, Appendix B of the IRME Work Plan .

The following were our responses to your comments in the order presented in your 10 October 1990 letter to Mr. Eisenman:

1. WESTON will use both a Photoionization Detector (PID) and an Organic Vapor Analyzer (OVA)/ Flame Ionization Detector (FID) during field screening during the investigations. This action will be taken in order to distinguish detection of methane gas from other potential organic vapors as well as to ensure that any potential presence of organic vapors with relatively high ionization potentials are not missed during field screening activities.
2. The deep wells proposed will not penetrate any significant confining clay layers identified during drilling activities. As specified in pages 3-13 and B-15 of the Site Investigation Work Plan, the presence of a

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significant confining clay layer will be monitored for at all the three well locations proposed. Should a confining layer be found, the "deep wells" will be screened immediately above this confining layer.

3. The Michigan Department of Natural Resource's PEAS number has been added to the list of emergency numbers in the Site Health and Safety Plan.

Issues regarding sample splits and quality assurance/quality control methods were also discussed with Ms. Haight. With regard to splitting samples, WESTON's field crew will attempt to accommodate MDNR requests whenever feasible. There may be instances, however, when poor recoveries during split-spoon sampling may not facilitate splitting of samples due to required volumes of materials needed for proper laboratory analysis. In these instances, AC Rochester and WESTON are prepared to work with the MDNR to identify an agreeable alternative to providing true split samples (e.g., provision of a sample from an adjacent depth interval).

During our conversation with Ms. Haight we also requested information on MDNR requirements concerning quality assurance/quality control procedures required associated with the laboratory analyses. Ms. Haight directed us to Mr. George Jackson, MDNR QA/QC officer who indicated that a decision on QA/QC requirements can be made only by the MDNR project manager.

With reference to monthly meetings, AC Rochester and WESTON do not plan to have regularly scheduled monthly meetings at this time. project-related meetings will be arranged on an as needed basis. MDNR will be notified of those meetings that will summarize significant findings or that will affect proposed changes to the scope of work as defined in the Work Plans. In addition, WESTON will copy the MDNR on the Monthly Progress Reports submitted to AC Rochester.

The last issue involves a correction on the analysis for Pesticides and PCBs presented on Table 3-1 of the IRME Sampling and Analysis Plan (Appendix B). The pesticide analysis will be for TCLP parameters and the PCBs for totals (i.e., total concentration). A revised version of Table 3-1 is included with this letter.

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WESTON will call you on 26 November to discuss this matter as well as any other issues you may have related to the Linden Road Landfill investigation.

If you have any questions or need additional information, please call us at (708) 918-4000.

Very truly yours,

ROY F. WESTON, INC.

A handwritten signature in black ink, appearing to read "S. Babusukumar".

S. Babusukumar
Project Manager

A handwritten signature in blue ink, appearing to read "Scott D. Springer".

Scott D. Springer
Project Director

SB:SDS/slr

cc: J. Hights - MDNR
R. Eisenman - AC Rochester
R. Neahusan - AC Rochester

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TABLE 3-1
 LABORATORY ANALYTICAL PARAMETERS
 BY WASTE TYPE
 LINDEN ROAD LANDFILL
 FLINT TOWNSHIP, MI

Surface Sludges Parameter	Oil Disposal Area Sludge and Soil				
	Red Barren Areas (4 Samples)	Wood Blocks (4 Samples)	(2 Samples)	Drum Contents (12 to 15 Samples)	(6 Samples)
Volatile Organics, (TCLP)	X	X	X	X ¹	X ¹
Semi-Volatile Organics, (TCLP)	X	X	X	X ¹	X ¹
Pesticides	X	X	X	X ¹	X ¹
RCRA Metals, (TCLP)	X		X	X ¹	X ¹
PCBs (Total)	X	X	X	X ¹	X ¹
Corrosivity	X		X		X ¹
Ignitability	X		X		X ¹
Reactivity					
Cyanides	X		X		X ¹
Sulfides	X		X		X ¹
Pesticides/PCBs	X	X	X	X ¹	X ¹
Paint Filter Test					
<u>Compatability Screening</u>					
H ₂ O				X	X
Hexane				X	X
pH				X	X
Peroxides				X	X
Oxidizers				X	X
Halogens				X	X