

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**RESPONSE TO COMMENTS AND FINAL DECISION**

*General Motors Corporation*  
*North American Car Group (NACG) Lordstown Assembly Plant*  
*And*  
*Metal Fabricating Division (MFD) Lordstown Metal*  
*Fabricating Plant*

## **INTRODUCTION**

This response to comments and final decision is presented by the U.S. EPA to identify the selected remedies, present concerns and issues raised during the public comment period, and provide responses to comments. All of the comments received were carefully reviewed during the final selection of the remedy and have been answered herein. A more limited remedy was proposed. However, the remedy proposed in the Statement of Basis was selected.

## **SELECTED REMEDIES**

The selected remedy for the Facility addresses the release of chemical contaminants from its operations to groundwater and soil.

Sources of the contamination appear to be from historic activities associated with the plant operations. There is evidence that there is a possible continuing source of contamination.

The following remedies involve long-term maintenance of controls to prevent human exposures to unacceptable levels of soil and groundwater contamination, and groundwater monitoring to ensure that contamination is not migrating off-site.

- **Engineering and Institutional Controls Restricting Exposure to Contaminated Soil and Groundwater and Limiting the Facility to Commercial or Industrial Use and Financial Assurance**

**Engineering and institutional controls will be implemented at the site, which will include a site wide plan to control particulate emissions from surface soils (i.e. dust control) and a Site plan to preclude the removal of pavement in a currently active waste drum unload area without proper health and safety controls or further assessment. In addition, the developed portion of the Site will be restricted to commercial or industrial use and groundwater use on-site will be restricted to nonpotable uses only through the implementation of an environmental covenant pursuant to the Uniform Environmental Covenants law (Ohio Revised Code 5301.80-5301.92).**

**Data indicates that constituent concentrations in soil are either below or higher than screening criteria based on commercial or industrial land use. This means the contaminated soil does not present unacceptable risks for commercial or industrial use, but the property should not be converted or used for residential land use, unless soils are first remediated to concentrations which would be protective of residential land use or other engineering controls are approved to mitigate exposures to levels which would be protective of residential land use.**

**Accordingly, GM-Lordstown must place a notation on the deed for the property that designates areas of the facility that have been impacted by previous activities. These use restrictions will be made permanent through the implementation of an environmental covenant and other enforceable use restrictions pursuant to the Uniform Environmental Covenants Law. The use restrictions will be placed on these areas to ensure continued industrial or commercial use. For ease in administration, the use restrictions will encompass the main operational portions of the plant buildings and yards. Measures will be taken to assure the restrictions (including the Operations and Maintenance (O&M) Plan requirements) are enforceable by U.S. EPA as well as by GM. The Environmental Covenant and other enforceable use restrictions would remain in place and enforceable if some or all of the property is transferred to different owners in the future. The land use in other areas of the plant is not restricted because the soil has not been impacted by site-**

related contaminants.

Furthermore, U.S. EPA will issue the Corrective Action Complete with Controls determination at a facility. This determination means: (1) a full set of corrective measures has been defined; (2) the facility has completed construction and installation of all required remedial actions; (3) site-specific media cleanup objectives have been met; and (4) all that remains is performance of required operation and maintenance and monitoring actions, and compliance with and maintenance of the environmental covenant. A Corrective Action Complete with Controls determination provides the owner or operator with recognition that protection of human health and the environment has been achieved, and will continue as long as the necessary operation and maintenance actions are performed, and the environmental covenant is maintained and complied with.

GM must also demonstrate that adequate funds will be available for the operation and maintenance of the selected remedy. GM must provide this financial assurance within 90 days after U.S. EPA selects the remedy and issues its Final Decision and Response to Comments. Any of the following financial mechanisms may be used to make this demonstration: financial trusts, surety bonds, letters of credit, insurance, or qualification as a self-insurer by means of a financial test. GM may request that the amount of the financial assurance be reduced from time to time during the operation and maintenance phase of the remedy or EPA can request an increase if more issues arise in the future.

➤ **Soil Excavation and Removal of Impacted Soil at Area of Interest (AOI)-13**

Soils under the AOI-13 Hazardous Waste Drum Unload Area were determined to pose a potential risk to routine facility workers if current controls (i.e., surface pavement) were removed. Soils that present an unacceptable potential risk to workers would be excavated, containerized, characterized and treated and/or disposed of off-site if and when future maintenance of the area is performed. The

area of soil to be removed is estimated to be approximately 2 feet deep and 20 feet by 30 feet for a volume of approximately 44 cubic yards. Post excavation soil samples would be collected and estimates of worker risk from exposure to soil concentrations remaining in the area would be determined to confirm that residual soil concentrations will not lead to unacceptable risks in the absence of engineering controls. This area has a number of above and below ground utilities and obstructions, which would make implementation difficult while maintaining the active status of this area. Therefore, this portion of the proposed remedy would not be implemented until future maintenance of the area and/or slab is required.

➤ **Implementation of a Site Wide Groundwater Monitoring Program, and Monitoring of Area of Interest (AOI)-35 Underground Storage Tank (UST) Area#4 Shallow Groundwater Zone, with Contingency Plans.**

GM-Lordstown must monitor groundwater (1) so that human beings are not exposed to unacceptable levels of groundwater contamination, (2) to verify whether the concentrations of constituents of potential risk are stable or decreasing at the source, and (3) to assess movement of the contaminated shallow water to ensure that it does not migrate out of the containment zone where it currently exists.

GM must monitor the wells in the Site Wide Groundwater Monitoring Program on a bi-annual basis for a minimum of two years, analyzing the samples for the compounds of interest, identifying trends through appropriate analysis of the results, and submitting bi-annual reports to the U.S. EPA. Subsequently, GM must monitor wells annually for three years, if the sampling results show no significant increase of constituent concentrations, and submit annual reports to U.S.EPA. The monitoring wells in the Site Wide Groundwater Monitoring Program are located at

the site's perimeter, to ensure none of the contaminants onsite are migrating off-site above the risk based screening levels (RBSLs) which are the Safe Drinking Water Standards Maximum Concentration Limits (MCLs) and the Equivalent Drinking Water Levels (EDWLs) for constituents without MCLs for the bedrock perimeter wells, and the GM-derived, U.S. EPA-approved Off-site Non-potable Groundwater Use Criteria and Off-site Indoor Air Inhalation of Vapors from Groundwater Criteria for the shallow perimeter wells. The network of wells selected in the Site Wide Groundwater Monitoring Program is:

Shallow perimeter monitoring wells:

- MW-202S, MW-203S, MW-204S, MW-314S, MW-401, and MW501

Bedrock perimeter monitoring wells:

- MW-202D, MW-203D, MW-205D and MW-314D

The selected monitoring wells will be sampled for total Target Analyte List (TAL) metals (Silver, Arsenic, Barium, Beryllium, Cadmium, Cobalt, Chromium (total), Copper, Manganese, Nickel, Lead, Selenium, Antimony, Vanadium, and Zinc) and TCL (Target Compound List) volatile organic compounds (VOCs).

GM must monitor groundwater wells in the AOI-35 UST #4 area monitoring network on a quarterly basis for a minimum of two years, analyzing the samples mainly for Benzene and other VOCs, identifying trends through appropriate analysis of the results, and submitting quarterly reports to the U.S. EPA. Subsequently, GM must monitor wells annually for three years, if the sampling results show no significant increase of constituent concentrations to levels above the Non-potable Groundwater use Criteria and Off-site Indoor Air Inhalation of Vapors from Groundwater Criteria, and submit annual reports to U.S.EPA.

**A total of six monitoring wells located in the overburden groundwater zone have been selected to monitor conditions at AOI-35 UST Area#4. Three monitoring wells selected at the AOI -35 UST #4 area would demonstrate through sampling whether contaminant concentrations at the source are decreasing or increasing in the area where the USTs were located. Three additional wells were selected as sentinel wells. The sentinel wells, which are located downstream of AOI-35 UST #4 within the site boundary, would demonstrate whether compounds of interest have migrated, and have the potential to migrate off-site. Constituent concentrations at sentinel wells must not exceed the risk based screening level (RBSL) Criteria. If constituents increase and start to approach the Non-potable Groundwater Use Criteria and/or the Off-site Indoor Air Inhalation of Vapors from Groundwater criteria, contingency plans must be implemented.**

**Actual sampling data from all of the wells monitored at AOI-35 UST #4 area will be used to evaluate and verify the results from the BIOSCREEN model presented in the CMP, which predicted the benzene concentrations will remain consistent or reduce over time. The network of wells selected in the AOI -35 UST #4 monitoring program are:**

**Source monitoring wells:**

- **MW-213, MW-214, MW-215**

**Sentinel monitoring wells:**

- **MW-313, MW-401, MW-402**

**The monitoring well sampling programs should achieve the following three objectives: 1) regularly monitor the concentrations, flow direction(s) and extent of the contaminated groundwater originating from the facility, 2) confirm whether the contaminated groundwater is relatively stable or decreasing by comparing new data to prior monitoring results, and 3) provide point of compliance monitoring at the source areas to determine whether the constituent concentrations are consistently below the appropriate RBSLs.**

**For both site-wide groundwater monitoring and AOI-35, the network of monitoring wells will define the containment area for groundwater. That is, within this network, groundwater must meet the appropriate RBSLs. The planning of this remedy would include action that will be taken if groundwater contaminant concentrations increase and start to approach the RBSLs or significant migration is noted. The specific contingency plans would be outlined in the Corrective Measures Implementation report that GM-Lordstown will prepare after the Agency has chosen the final remedy. The specific measures to be developed must assure protection of human health and the environment from adverse effects. Possible contingent remedies could include active groundwater remediation or containment.**

**After the initial five year period of monitoring, GM may propose a more limited groundwater monitoring program depending on the results of the monitoring by submitting a written request to U.S. EPA and receiving U.S. EPA's approval. GM may also propose to possibly discontinue the monitoring programs by submitting an "Attainment of Ground Water Performance Standards Report" and certification, and obtaining U.S. EPA approval if the results from 5 years of consecutive rounds of monitoring demonstrate that concentrations below appropriate RBSLs have been achieved. In the report, GM must demonstrate whether the ground water performance standards have been attained in satisfaction of the requirements of the Order by showing contaminant concentrations are steady and have a downward trend to ensure that the concentrations will remain below the RBSL in the future once the monitoring has commenced.**

The remedies selected provide for a good balance for controlling unacceptable risk and groundwater contamination.

## **PUBLIC PARTICIPATION ACTIVITIES**

A public comment period was set from October 13<sup>th</sup>, 2006 through November 30<sup>th</sup> 2006. One set of comments were received by U.S. EPA during the public notice period.

The comments were from General Motors. No public meeting was requested during this time period.

## COMMENTS AND THE AGENCY'S RESPONSE

### Response to GM's Comments

1. *Page: Title Page*

*Although the facilities at the GM Lordstown Site have recently combined operations and will be represented under one USEPA identification number in the future, the RCRA 3008(h) Administrative Order on Consent (Order) dated June 20, 2000 identifies two USEPA identification numbers for the GM Lordstown Site: OHD 020 632 998 (Lordstown Assembly) and OHD 083 321 091 (Metal Fabricating). The SB should reference both, as both facilities have been investigated in the RFI process as documented in the RFI Report and CMP.*

#### **U.S. EPA Comment**

The title of the Statement of Basis states, "The Statement of Basis for General Motors Corporation North American Car Group (NACG) Lordstown Assembly Plant and Metal Fabricating Division (MFD) Lordstown Metal Fabricating Plant", which clearly acknowledges both parcels. U.S. EPA acknowledges that there are two facility identification numbers. The comment is noted.

2. *Page 1*

*The SB incorrectly indicates that a Corrective Measure Study ("CMS") was prepared and submitted for the Site. Rather, in compliance with the Order, a RCRA Corrective Measures Proposal ("CMP") (H&A 2005) was prepared and submitted by GM.*

#### **U.S. EPA Comment**

U.S. EPA acknowledges GM Lordstown submitted a "Corrective Measures Proposal", not a "Corrective Measures Study". The comment is noted.

3. *Page 2*

*The SB indicates that one of the proposed remedies at the Site is Industrial Use Restrictions. However, as discussed in Section 4.01 of the CMP, the calculations performed in support of the baseline risk assessment included in the RCRA Facility Investigation Report ("RFI Report") (H&A 2004), assumed that future Site land use will be commercial or industrial. GM requests that the SB be revised to reflect the possibility for future commercial or industrial land use.*

#### **U.S. EPA Comment**

U.S. EPA acknowledges Commercial/Industrial land use at specific locations at the GM-Lordstown site. However, U.S. EPA will not revise the Statement of Basis. The Statement of Basis is a historical document which was prepared for last year's public comment period. The U.S. EPA would only revise the statement of basis if there was a need for another public comment period. Changes will be made to the selected remedy in

the final decision. The comment is noted.

**4. Page 2**

*As discussed in Section 3.03 of the RFI Report, based on current land use, current zoning, current surrounding land use, and regional development goals, it is reasonably expected that the Site will remain in use for industrial purposes for the foreseeable future. However, if residential land use were to be considered, GM does not believe that it would be necessary or appropriate to use “screening criteria” as cleanup standards, as suggested in the SB. Rather, GM believes that the appropriate approach would be to use site-specific risk assessment to determine the necessary level of remediation and/or controls to prevent significant risks under residential land use. The approach would be identical to the methodology that was used in evaluating the Site conditions during the RFI to determine the necessary level of remediation and/or controls to prevent significant risks under commercial and industrial land use.*

**U.S. EPA Comment**

U. S. EPA agrees that a site specific risk assessment would be used to determine the necessary level of remediation and/or controls to prevent significant risks under residential land use. Changes will be made to the selected remedy in the final decision. The comment is noted.

**5. Page 2**

*The SB states that “use restrictions will be made permanent through the implementation of an environmental covenant and other enforceable use restrictions pursuant to the Uniform Environmental Covenants Law and other appropriate legal mechanisms.” The USEPA and GM need to review the applicability of the Ohio Uniform Environmental Covenants Law. Further, GM requests that the USEPA be more specific about what is meant with regards to “other appropriate legal mechanisms.”*

**U.S. EPA Comment**

The Corrective Measures Proposal ( Revised November 18<sup>th</sup> , 2005) submitted by General Motors states “ The existing Administrative Order on Consent or an implementation order will be amended/established to implement environmental covenant pursuant to the Uniform Environmental Covenants Law ( Ohio Revised Code 5301.80-5301.92). Further, these restrictions will be documented with the local municipality. Specifically, an informational notice will be recorded in the property deed(“deed notice”) so that any future owner/operators will be aware that residual contamination exist at the Site and that use restrictions are necessary to prevent unacceptable exposures.” U. S. EPA agrees with that statement. The comment is noted. “Other appropriate legal mechanisms” will be removed from the selected remedy in the final decision.

**6. Page 3**

*As discussed in Section 5.05.B of the RFI Report, currently the risks to routine workers due to soil concentrations in AOI 13 are not expected to be significant. If the pavement*

*in this area were to be removed in the future, risks to routine workers could be significant. To address this issue, the CMP proposed engineering and institutional controls in AOI 13 rather than active remediation (e.g., soil removal) because GM does not expect to remove the pavement in the foreseeable future. However, if the removal of pavement were to be considered, GM does not believe that it would be necessary or appropriate to use “screening criteria” as cleanup standards, as suggested in the SB. Instead, GM believes that the appropriate approach would be to use site-specific risk assessment to determine the necessary level of remediation and/or controls to prevent significant risks. The approach would be identical to the methodology that was used in evaluating the Site conditions during the RFI to determine the necessary level of remediation and/or controls to prevent significant risks under commercial and industrial land use.*

**U.S. EPA Comment**

The U. S EPA agrees with GM’s comment. Changes will be made to the selected remedy in the final decision. The comment is noted.

**7. Page 4**

*The SB discusses the presence of a “perched” water zone in the overburden. The term perched indicates an intermittent and discontinuous saturated zone, which is inconsistent with the findings discussed in the RFI Report. As discussed in the RFI Report, the field investigation identified “shallow” groundwater in the overburden (see Section 3.07.A of the RFI Report) that appears continuous across the Site throughout the year.*

**U.S. EPA Comment**

The U.S. EPA agrees with GM’s comment. The comment is noted, and the final decision refers to shallow groundwater.

**8. Page 4**

*The SB proposes a bi-annual sampling program for site-wide groundwater for the first two years, followed by annual sampling for another three years, combined with statistical analysis of the results. The RFI determined that shallow groundwater movement is approximately two feet per year, while the bedrock groundwater movement is approximately three feet per year. Contaminant migration would be even slower due to retardation effects such as adsorption. For VOCs, typical retardation factors can be approximately 2. GM believes that bi-annual sampling is unwarranted given the relatively slow movement of groundwater at the Site and the extensive groundwater monitoring network present at the Site and sampled by GM for the RFI. Further, given that the number of individual samples from individual wells is limited and is comprised of mainly non-detects, statistical analysis is unwarranted. GM requests that the USEPA revise the site-wide groundwater monitoring program to annual sampling with a comparative analysis that is appropriate for the data set generated from this monitoring program (e.g., observed concentrations are greater than/less than/the same as previously observed or, if adequate data are available, linear regression analysis to assess whether the data indicate concentrations are decreasing, increasing or remaining stable).*

### **U.S. EPA Comment**

The U.S. EPA disagrees with GM regarding this comment. U. S. EPA has determined that Bi-annual sampling is warranted at the site. Bi-annual sampling will provide at least two sampling points to compare any fluctuation or detections of any constituent on an annual basis. This data will also constitute a measure of performance of the monitoring program. However, U.S. EPA agrees that statistical analysis may not be necessary based on the limited amount of data. A comparative analysis of the data is satisfactory.

The U.S.EPA must have sufficient data showing contamination is not leaving the site above levels that are protective of human health and the environment. As stated in the Statement of Basis, GM will be allowed to monitor groundwater on an annual basis after the initial two year sampling period if there are no significant increases of constituent concentrations. After the initial five year period of monitoring, GM may propose a more limited groundwater monitoring program depending on the results of the monitoring by submitting a written request to U.S. EPA and receiving U.S. EPA's approval. GM may also propose to possibly discontinue the monitoring program in the future. Overall, U.S. EPA is selecting 2 additional rounds of sampling over what GM had proposed for its final remedy.

### **9. Page 4**

*The SB indicates that groundwater sampling in AOI 35 should be quarterly for a minimum of two years followed by annual sampling for an additional three years. The SB further indicates that a statistical analysis of the results should also be conducted. The SB also identifies VOCs, SVOCs, and metals as target compounds for the area. As identified above, GM believes that this level of sampling is not warranted given the slow groundwater movement in the shallow overburden zone at the Site. Also, as identified above, any statistical analysis would be limited given the non-detects and limited number of samples available from individual wells. Further, the RFI Report did not identify SVOCs or metals as constituents of concern for AOI 35. As discussed in Section 4.22.B of the RFI Report, groundwater sampling in AOI 35 revealed concentrations of VOCs above drinking water criteria. As further discussed in Section 5.02.B of the CMP, only benzene was identified above applicable off-site criteria in the source area at well MW-214, consistent with the identified gasoline release in AOI 35. Given the age of the release and the remedial measures already implemented in AOI 35 by the Facility at the time of the release, additional monitoring in the source area would provide no meaningful additional data except to confirm the conclusions of the RFI Report. Therefore, GM requests that the USEPA revise the AOI 35 groundwater monitoring program to limit quarterly sampling to the first year as proposed, monitor only MW-214 in the source area, analyze for TCL VOCs only, and utilize a comparative analysis that is appropriate for the data set generated from this monitoring program (e.g., observed concentrations are greater than/less than/the same as previously observed or, if adequate data are available, linear regression analysis to assess whether the data indicate concentrations are decreasing, increasing or remaining stable).*

### **U.S. EPA Comment**

GM states "Given the age of the release and the remedial measures already implemented

in AOI 35 by the Facility at the time of the release, additional monitoring in the source area would provide no meaningful additional data except to confirm the conclusions of the RFI Report.” The purpose of the RFI is to define the nature and extent of contamination and to determine if there is a current and/or future risk to human health and/or the environment. Concentrations of constituents that were detected during the RFI demonstrated that if concentrations of benzene and MTBE at AOI 35 in 2002 were to leave the site, they would be in excess of the MCLs, and for benzene, concentrations would be in excess of the Off-site Kiddie Pool criteria. The main issue U.S. EPA has is benzene concentrations increased between the July 2001, and the January 2002 sampling period, and anomalously went down again in the December 2002 sampling. According to the data, there seems to be some continuing source of contamination in this area. The age of the release and remedial measure implemented has been taken into consideration; however, considerable contamination is still present, which was indicated by the increase in benzene and MTBE from the 2002 data. U.S. EPA feels strongly that GM must monitor the source area to demonstrate through actual data, that natural attenuation of benzene and other VOCs is taking place. The results of this data will give EPA added confidence in decision making for a more limited monitoring program in the future. The data must show the constituent concentrations decreasing and/or remaining stable through consecutive rounds of quarterly sampling.

Furthermore, U.S. EPA agrees that sampling at AOI-35 for SVOCs and metals is not warranted because they are not constituents of concern in that area.

Controlling sources of contaminations is consistent with U.S.EPA’s long standing pollution prevention goals. We feel the sampling program proposed for this area of concern is adequate to provide data showing that contaminants are not migrating from the site, and concentrations of contaminants are decreasing through natural process to prevent unacceptable exposures to human or ecological receptors.

#### 10. Page 7

*The SB indicates that the groundwater monitoring at AOI 35 is required to show that “contaminant concentrations are steady and have a downward trend.” The SB also indicates that a certified “Attainment of Ground Water Performance Standards Report” must be submitted and approved by the USEPA to “demonstrate that concentrations below appropriate RBSLs have been achieved.” Further, the SB indicates that the Corrective Action Complete with Controls determination will be withheld until the above determination is complete. GM believes that these provisions of the SB are not warranted based on the following information and technical analysis that have been developed and documented in the RFI Report and CMP.*

- *As identified in the CMP (page 29, Section 5.02 B), the groundwater monitoring at AOI 35 was proposed as a “prudent measure to confirm that constituents downgradient of AOI 35 remain below target risk levels.” The RFI Report concluded that there is no current or future risk due to constituent concentrations in groundwater at AOI 35, thus GM does not consider any additional soil or groundwater remediation necessary for this area.*

- *The proposed groundwater monitoring was not intended to validate the BioScreen model. It was proposed as a prudent measure to confirm the conclusions of the RFI Report. This could be considered a “control”, similar to operations and maintenance monitoring at other sites.*
- *Development of contingency plans is unwarranted at this point in time, given that concentrations reported from the RFI sampling do not present an unacceptable risk.*

*Consistent with USEPA’s Final Guidance on Completion of Corrective Action Activities at RCRA Facilities (USEPA 2003), “complete with controls” should be granted with the proposed groundwater monitoring during the first 5 years. In particular, GM has met the corrective action risk goals (i.e., protection of human health and the environment has been achieved) and the areas evaluated in the CMP do not require active measures. Therefore, GM requests that upon implementation of the institutional and engineering controls for the Site, GM be granted a Corrective Action Complete with Controls determination.*

### **U.S. EPA Comment**

The U.S. EPA disagrees with GM regarding this comment. The Statement of Basis clearly states, “GM may also propose to possibly discontinue the monitoring programs by submitting an “Attainment of Ground Water Performance Standards Report” and certification, and obtaining ***U.S. EPA approval if the results from 5 years of consecutive rounds of monitoring*** demonstrate that concentrations below appropriate RBSLs have been achieved. GM has not performed 5 years of consecutive rounds of monitoring at this site.

U.S. EPA feels monitoring at AOI-35 is not only a prudent measure, but necessary. Furthermore, monitoring at AOI-35 should proceed with a) a downgradient sentinel well to guard against the (unlikely) occurrence of contamination leaving the site and b) performance monitoring points that would generate sufficient data to indicate the efficacy of the attenuation process over time. Submission of updated modeling results can be used to supplement actual field data, but should not be used as a substitute for data.

In addition contingency plans are necessary in cases of unexpected events; U. S. EPA must also be able to ensure the public that G.M. will be prepared to deal with the issue.

Moreover, the “Attainment of Groundwater Performance Standards Report” and “Corrective Action Complete with Controls” are agency determinations. The U.S. EPA will issue these determinations at its discretion. However, U.S. EPA acknowledges the facility meets the requirements of the Corrective Action Complete with Controls determination and will issue the determination to the facility once the final remedy decision has been made for the site, and the enforceable controls are in place.

### **11. Page 14**

*As discussed in Section 5.05.B of the RFI Report, the upper-bound estimates of*

*cumulative cancer risk for on-site workers are less than the USEPA's established goal of  $10^{-4}$ . The SB incorrectly indicates a risk goal of  $10^{-5}$ .*

**U.S. EPA Comment**

U.S. EPA's risk goal for this site is  $10^{-5}$ , with an acceptable risk range of  $10^{-4}$  to  $10^{-6}$  depending on the circumstances. However, U.S. EPA acknowledges this typing error. Comment Noted.

**12. Page 16**

*The SB indicates that exposure to constituents volatilizing from shallow groundwater into indoor air is a potential pathway and that it was evaluated during the RFI using conservative screening criteria based on exposure factors for indoor air inhalation in industrial buildings. While this is correct, the SB should be revised to indicate that the assessment also was appropriate for commercial buildings in addition to industrial buildings.*

**U.S. EPA Comment**

The U. S EPA agrees with GM's comment. However, U.S. EPA will not revise the Statement of Basis. The Statement of Basis is a historical document that was prepared for last year's public comment period. The U.S. EPA would only revise the statement of basis if there was a need for another public comment period. The comment is noted.

**13. Page 16**

*As discussed in Section 5.05.B of the RFI Report, the cumulative cancer risk for construction worker exposure to groundwater in AOI 53 did not exceed the USEPA's established goal of  $10^{-4}$ . The SB incorrectly indicates a risk goal of  $10^{-5}$ .*

**U.S. EPA Comment**

U.S. EPA's risk goal for this project is  $10^{-5}$ , with an acceptable risk range of  $10^{-4}$  to  $10^{-6}$  depending on the circumstances. However, U.S. EPA acknowledges this typing error. The comment is noted.

**14. Page 23**

*The SB indicates that constituents present in soil and groundwater at parts of the Site where industrial activities took place and industrial slag fill were deposited may potentially pose a significant risk without proper controls. This language could be interpreted to say that the placement of slag fill material was the result of industrial activities at the Site that are subject to RCRA corrective action. The SB should be revised to clarify that the slag material was utilized as engineered fill during the initial development of the Site and prior to Site operations, as opposed to releases during operations subject to RCRA corrective action.*

**U.S. EPA Comment**

The U. S EPA agrees with GM's comment. However, U.S. EPA will not revise the Statement of Basis. The Statement of Basis is a historical document that was commented

on during last years public comment period. The U.S. EPA would only revise the statement of basis unless there was a need for another public comment period. The comment is noted.

## **SUMMARY**

In summary the comments received from General Motors did not change the proposed remedy.

## **Future Actions**

Upon notification by U.S. EPA, General Motors will implement the final remedy selected, and follow the schedule in accordance with Section 6 part 20(a) through 20(g) of the RCRA 3008(h) Administrative Consent Order for the facility. Some of the proceedings GM will perform under Section 6 Part 20 of the Administrative Consent Order will be:

- Establish a publicly accessible repository for information regarding site activities and conduct public outreach and involvement activities,
- Provide quarterly progress reports to U.S. EPA detailing work performed to date, data collected, problems encountered, project schedules, and percent project complete by the 15<sup>th</sup> day of each month following a quarter,
- Communicate frequently and in good faith with U.S. EPA, to assure successful completion of the requirements of the Order, and meet with U.S. EPA on at least a semi-annual basis to discuss the work proposed and performed, and
- Provide a Final Remedy Construction Completion Report documenting all work that GM has performed. The Construction Completion Report must include an operations and maintenance plan. This report will be due 60 days upon notifying General Motors of the selected remedy. The operation and maintenance plan will be implemented upon U.S. EPA's approval.

## **DECLARATION**



CA Section Staff	CA Section Chief	Corrective Action Manager	ORC Section Staff	ORC Section Chief	Division Director
Tammy Moore	George Hamper	Gerald Philips	Tom Krueger	Deborah Garber	Margaret Guerriero