April 7, 2017 Reference No. 077493

Mr. Jason Lowery
Site Assessment Team Leader – Remediation & Redevelopment Bureau
Wisconsin Department of Natural Resources (WDNR)
101 S. Webster St.
P.O. Box 7921
Madison, WI
U.S.A. 53707-7921

Dear Mr. Lowery:

Re: Response to WDNR Comments dated February 8, 2017
Case Closure Submittal Update
GM Haul Away Yard Former, 544 Kellogg Avenue, Janesville, Wisconsin
DNR BRRTS Activity # 02-560181

Thank you for the WDNR email dated February 8, 2016 (signed by Shawn Wenzel). The following is General Motors LLC's (GM's) response to the Wisconsin Department of Natural Resource WDNR's request for updated Case Closure documentation.

WDNR Comment No. 1

One item that was on the email sent to Kim was that at least one additional round of groundwater sampling is needed. It appears as though that has not been completed. Is that work to be completed or are you asking that the request be reconsidered without the additional sampling.

GM Response:

One additional round of groundwater sampling was completed on September 22, 2016 at the three existing monitoring wells (MW-1-12, MW-2-12, and MW-3 -12), which was the second round of samples to be collected at these wells. The information obtained from this sampling event was submitted via email to the WDNR on November 07, 2016 as requested by the WDNR. VOCs were not detected during this sampling event. GHD installed a new well at MW-1-16 to investigate potential VOC impacts at Tank L. MW-16-16 was also sampled on September 22, 2016 and indicated six detections (see attached Figures B.2.a and B.2.b), as follows:

- 1,2,4-Trimethylbenzene was detected at a concentration of 38 μg/L (no criteria promulgated)
- 1,3,5-Trimethylbenzene was detected at a concentration of 13 μg/L (no criteria promulgated)
  - Total trimethylbenzene was detected at a concentration of 51 μg/L which is less than the Preventative Action Limit (PAL) of 96 μg/L
- Isopropyl benzene was detected at a concentration of 6.6 μg/L (no criteria promulgated)
- Ethylbenzene was detected at a concentration of 13 μg/L 10 times lower than the PAL of 140 μg/L
- Xylenes (total) were detected at a concentration of 6.8 μg/L about 2 percent of the PAL of 400 μg/L

No VOCs were detected at MW-1-12, MW-2-12, MW-3-12, and all detections at MW-1-16 were below the PALs, which are more stringent than the applicable criteria (i.e., the enforcement standards), and groundwater use is controlled by a Deed Restriction. Additionally, MW-1-12, MW-2-12, and MW-3 -12 have already been sampled twice. GM thought the intended purpose of sampling the soil and groundwater at Tank L and installing well MW-1-16 was to look for trichloroethene (TCE). TCE was not detected at MW-1-16 in the soil or groundwater during the most recent sampling event. Therefore, GM believes that the closure request should be reconsidered without an additional round of sampling at MW-1-16.

WDNR Comment No. 2

The other item is in regards to the labels/titles for the figures. For example, the soil sampling figures. The labels do not follow the required format as listed on the checklist, which is why I asked about the PCB's not being on the figures. They will need to be revised to follow the format of B.2.a. (to include all detections) and B.2.b. (to include all residual contamination after remediation), instead of B.2.a, B.2.b, B.2.c., and B.2.d. This is important in part for consistency since people know which figures to look for when searching for certain data.

GM Response:

Figures and tables have been updated following the required format as listed on the WDNR's Case Closure – GIS Registry Form 4400-202. The updated form, tables, and figures are provided as attachments to this letter. The attachment should supplement the updated closure package received by you on January 31, 2017.

If the WDNR would like to discuss the above responses, or has questions, please let me know and we will set up a conference call for WDNR to talk with the GM Project Team.

Sincerely,

GHD

Mauricio Barrera, MASc.

MB/kf/1

Encl.

cc:

Kim D. Tucker-Billingslea, GM
Renee Sandvig, Ramboll Environ
Glenn Turchan, GHD
Ryan Bayne, GHD
Tom Kinney, GHD