



February 28, 2017

Kim D. Tucker-Billingslea, CHMM
General Motors LLC
GEC&S - Remediation Team
M/C 480-109-MB1
30400 Mound Road
Warren, MI 48092

Subject: Department of Natural Resources Review of '*Phase II Environmental Site Assessment (ESA)*' for the General Motors Janesville Assembly Plant property at 1000 General Motors Drive, in Janesville, WI BRRTs # - 02-54-560205

Dear Ms. Tucker-Billingslea:

The Wisconsin Department of Natural Resources ("the Department") has reviewed the '*Phase II Environmental Site Assessment (ESA)*' for the General Motors Janesville Assembly Plant property at 1000 General Motors Drive ("the Property"), in Janesville, WI. The report was prepared for General Motors, LLC (GM) by GHD Services, Inc. (GHD). The submitted report is in regards to the former GM Janesville Assembly Plant located at 1000 General Motors Drive. A technical review fee, in accordance with ch. NR 749 Wisconsin Administrative Code, was received by the Department to conduct the necessary review.

In response to the discharge of hazardous substances at the Property, environmental consultants on behalf of the Property owners submitted the report to the Department for purposes of complying with ch. 292, Wis. Stats., the Hazardous Substance Spills statute and the ch. 700 Wis. Adm Code rule series. The purpose of this review letter is to provide GM the Department's findings and determinations based on the Department's review of the submitted report.

Environmental Investigation Determination

The review and approval of an environmental investigation by the Department is authorized under s. 292.15(2) (a) 1. Wis. Stats., and ch. NR 724.07(2), Wis. Adm. Code. The Department has conducted a review of the submitted report, along with additional information received after the submitted report was received. The findings and determinations made by the Department were based on the review of the following documents:

- Site Investigation Report Addendum No. 1, GHD Services, Inc. (GHD), 2016, General Motors Assembly Plant, 1000 General Motors Dr., Janesville, WI 53546, January 26, 2016
- Phase II Environmental Site Assessment (ESA), GHD Services, Inc. (GHD), 2016, General Motors Assembly Plant, 1000 General Motors Dr., Janesville, WI 53546, May 30, 2016

Adequacy of Environmental Investigation

Contamination has been identified in soil and groundwater (gw) on the Property. It appears that multiple parcels, and addresses, are included with the work completed. Based upon the information submitted, the Department has

determined that the site investigation is incomplete and additional work is required to define the degree and extent of soil and gw contamination, and to evaluate the risk of potential vapor migration and intrusion.

- NR 720 RCL standards for soil for the protection of gw should be included on data tables & figures.
- The soil contamination investigation should expand to further define the extent of gw residual contaminant level (RCL) and Non-industrial direct contact (DC) standards.
- The gw contamination investigation should expand to further define the extent of enforcement standard (ES) & preventative action limit (PAL) standards.
- The soil and gw investigation needs to extend off site if/where necessary to fully define the degree and extent of each media type.
- Figures should identify areas with soil contamination exceeding the soil to gw RCL standard. Use a single contour to outline each continuous area of exceedances.
- Maps/Figures are required to show the extent of soil contamination exceeding gw RCL standards, and gw contamination exceeding the ES and PAL standards. Use a single contour to outline each contiguous area of exceedances.
- Vapor sampling needs to be completed. If it is not completed now, it will need to be completed before occupancy. This includes any redevelopment of the property.
- The formatting of the numbers in the data tables should be consistent across the tables throughout the reports. For example the screening levels should be in general number format similar to the rest of the table, not scientific number format.
- Data on Figures should be reviewed to be consistent with data included in the tables and lab reports. For example, PCB results on Figure 5.2 of the Phase II report show PCB's as being "J" flagged for an estimated value, while Table 5.2 and the lab data table, Table 2a (Page 9,584 of report), indicate that the results are not "J" flagged as estimated values.
- A listing of each of the parcel ID's and street addresses associated with the property should be included.

The following is a list of some areas to highlight, that require further attention:

1. SB 46-16/MW-21S requires further definition of the VOC's & Metals in the soil
2. MW42S requires further definition of the mercury in soil
3. MW52S - during next sampling event, need to have lab establish a detection limit for PCBs below ES of 0.03 ug/L, also need additional PCB sampling data from soil surrounding the boring location
4. MW57S - investigate the area of the paint mix room, sludge room, thinner pump house, etc. Samples should be analyzed for VOCs & PCBs – soil & gw
5. MW-24S - further investigation of soil & gw due to presence of TCE
6. MW66S - further investigation of soil & gw due to presence of TCE, vinyl chloride
7. MW22S - need to know the extent and source Chromium exceedances in gw.
8. MW70S - define extent, identify source of PCE
9. MW5S/5D - define extent, identify source of Chromium in gw
10. MW-7S - Need further investigation of Soil and gw for VOCs and metals.
11. MW-79S - VOCs need further investigation in the area in soil and gw
12. SB-215-16 - additional investigation needed due to high lead
13. MW-68 - the extent of free phase product needs to be defined and the type of product should be identified. Are there any underground utilities in the area?

In summary, upon completion of the above work and site investigation, a report should be completed and submitted documenting the work and including all applicable forms and documentation. Recommendations for additional work should be part of the report including remedial efforts.

If you have any questions or concerns regarding the environmental investigation and cleanup of the Property, please contact me at (608) 758-4934 or shawn.wenzel@wisconsin.gov.

Sincerely,



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cc: Mauricio Barrera, GHD Services, Inc., 5325 Wall Street Suite 2305 Madison Wisconsin 53718