

State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
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November 10, 2017

DNR BRRTS Activity # 02-54-577951

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

Dear Ms. Tucker-Billingslea:

It was good to meet with you and your project team on October 24th. Thank you for submitting the Remedial Action Options Report (RAOR) for the Rock River (RM 178.5 to 180.5). The Department accepts the report. GM may move to remedial design. We would recommend that the project designers comply with regulatory permitting during the design and consult with local and state regulators on the permitting process and time lines.

At our meeting we discussed the site investigation and the RAOR associated with the above-referenced case, but we also discussed the statuses of the other GM cases. A few specific issues were discussed and the primary ones are summarized below:

- The term "Risk Assessment" as utilized in s. NR 722.11(1), Wis. Adm. Code, is a document that may only be relied upon if approved ahead of time by the Department and only when compliance with applicable environmental standards listed in s. NR 722.09(2) will not be protective or when attaining compliance with applicable RCLS in ch. NR 720 is not practicable. A risk assessment for soil or sediment contamination has not been approved for use at this site.
- Development of site-specific numbers for soil and sediment require the Responsible Party (RP) to use general exposure assumptions approved by the DNR.
- The RP will need to identify either an "industrial" or "non-industrial" land use classification in accordance with ch. NR 720, Wis. Am. Code.
- According to s. NR 716.11(3)(a), Wis. Adm. Code, the extent of soil contamination, including soil-to-groundwater RCL exceedances, must be defined, regardless of the presence of groundwater contamination.
- Per our August 1, 2017 closure letter for the GM Haul Away Yard case, the RP must assess the potential for vapor intrusion before a building is constructed and/or an existing building is utilized.
- Some material that is currently sediment will be re-classified as soil and therefore subject to ch. NR 720 Soil Cleanup Standards when the ordinary high water level changes, due to the

upcoming removal of the dam. DNR staff will need to define the new ordinary high water level mark. Please work with the DNR's Water Program on this topic. We can assist you in coordinating a meeting with DNR staff.

- If an engineering control is required for sediment contamination, financial assurance for maintenance of the engineering control is needed from the current RP (Wis. Stat. § 292.12(2)(d)(2)). The RP will maintain responsibility after case closure for the maintenance, inspection and repair of any engineering control used to address contaminated sediment.
- In the event that the property is sold, GM will remain an RP (Wis. Stat. § 292.11(3)). DNR will continue to work with the new property owner on the appropriate response actions, but as discussed with you in previous meetings, GM is the causer and will remain as an RP at this site.

The DNR appreciates your efforts to restore the environment at this site. If you have any questions regarding these decisions or anything outlined in this letter, please contact us at either of the numbers below.

Sincerely



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