



Oak Ridge Operations
P.O. Box 2001
Oak Ridge, Tennessee 37831—8723

November 29, 1994

Roger A. Gaede
Senior Staff Engineer
Inland Fisher Guide
General Motors Corporation
1450 East Beecher Street
Adrian, Michigan 49221

Dear Mr. Gaede:

GENERAL MOTORS ADRIAN PLANT - PROPOSED CLEANUP STRATEGY

The purpose of this letter is to outline the Department of Energy's (DOE) proposed cleanup strategy for the General Motors Adrian Plant. As we have previously discussed, the oil remaining in the collection system located beneath the former extrusion facility must be removed in order to investigate and remediate suspected contamination in the system, including the lateral collection lines. DOE is currently evaluating the appropriate regulatory classification of the oil and determining best available remediation options that are consistent with DOE guidelines and other applicable federal and state regulatory requirements. Concurrently with this effort DOE is developing plans for characterization and removal of suspected contaminated materials from the manholes, sumps, drains and lateral lines once the oil has been removed.

Since DOE does not have a generic cleanup guideline for uranium, uranium guidelines are derived on a site-specific basis to be protective of the public and the environment. DOE has established a derived concentration guide of 600 pCi/L total uranium for discharges of liquid waste containing uranium from DOE facilities to surface waters. Additionally, the Nuclear Regulatory Commission (NRC) has established a concentration limit of 300 pCi/L for natural uranium in liquid effluent discharges to unrestricted areas (10 CFR 20), and 3,000 pCi/L natural uranium for discharges to sewers from licensed facilities. Although these guidelines refer specifically to discharges of water to waterways or sanitary sewers they will be used as a reference point for comparison purposes. In addition DOE is gathering data in an effort to establish an industry standard for concentration limits of uranium in oil.

I have enclosed an analytical data summary and tables that presents the analytical results for oil, water, sediment/sludge and scale samples from the oil collection and storm water systems collected during August 1994 at the General Motors Adrian Plant. The highest concentration of uranium detected in the oil collection system was 307 pCi/L (collected from the 42-inch sump), all other results were below 300 pCi/L. As you are aware, I have informally discussed the analytical results and possible remediation options with Mr. David Minnaar from the Michigan Department of Public Health (division of Radiological Health).

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Mr. Gaede

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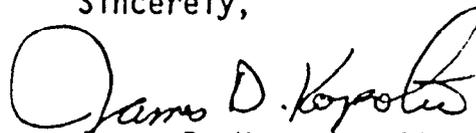
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Management of the oil as a clean oil may be possible under State of Michigan guidelines; in which case it would be DOE's position that GM be responsible for the disposition or beneficial recycling of the oils prior to or during the FUSRAP remediation effort.

The current schedule for the proposed remediation calls for cleanup activities to begin in the first quarter 1995 and conclude during the summer. Please let me know if this schedule will unduly impact your plant operations during this time period. As we complete our remediation options analyses and finalize our remediation approach, I would be glad to meet with you to discuss our final plan. In addition to the analytical data summary and tables, I am enclosing copies of photographs taken during our previous visit.

I am pleased to be initiating these cleanup measures at the General Motors Adrian Plant, and I am looking forward to working with you on the successful implementation of this project. If you have any questions, comments, or require further information, please call me at (615) 576-9441

Sincerely,



James D. Kopotic, Site Manager
Former Sites Restoration Division

Enclosure

cc:
David W. Minnaar, Chief
Licensing and Registration Section
Michigan Department of Public Health

Michelle T. Fisher, Council
General Motors Corporation