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**Worldwide Facilities Group  
Environmental Services  
Remediation Team**

**James F. Hartnett  
Program Manager**

November 16, 2007

Ms. Susan Edwards, P.E.  
Bureau of Central Remedial Action  
Division of Environmental Remediation  
New York State Department of Environmental Conservation  
625 Broadway, 12<sup>th</sup> floor  
Albany, New York 12233

NOV 19 2007

Re: Former IFG Facility (Registry # 7-34-057) and Ley Creek Deferred Media  
NYSDEC Order on Consent Index # D-7-0001-97-06  
Vapor Intrusion Investigation Work Plan – Additional Sampling Heating Season 2007-2008

Dear Ms. Edwards:

Following receipt of the March 2007 indoor air analytical results, General Motors Corporation (GM) has evaluated the potential for collection of additional environmental samples in connection with the vapor intrusion investigation activities being conducted at the Former Inland Fisher Guide (IFG) Facility in Syracuse, NY.

**Background:**

Consistent with the February 27, 2006 and February 26, 2007 Work Plans, approved by the Department on March 17, 2006 and March 27, 2007, GM performed indoor air sampling in March 2006 and March 2007. The results of the indoor air sampling were provided to the Department in a letter dated June 23, 2007 and a data summary report dated July 25, 2007. The detections of trichloroethene (TCE), 1,1,1-trichloroethane (1,1,1-TCA), and tetrachloroethene (TCE) for these two sampling events are summarized on the attached figure.

**Proposed sampling:**

GM proposes to collect three indoor air samples within the manufacturing building along with co-located sub-slab soil vapor samples. In addition, one ambient air sample will be collected from a location upwind of the manufacturing building. The objectives of the sampling are to:

- Evaluate the detected tetrachloroethene (PCE) concentrations in indoor air in Tenant Space 1. Specifically, PCE was detected at a concentration of 530 ug/m<sup>3</sup> in indoor air during the March 2007 sampling event. The corresponding May 2007 sub-slab concentration was estimated at 1.6 J ug/m<sup>3</sup>. The detection of PCE during the May 2006 sampling event was 3.9 ug/m<sup>3</sup> with a corresponding sub-slab concentration of 1.9 ug/m<sup>3</sup>. These concentrations suggest that indoor air PCE concentrations may not be related to vapor intrusion. Further, it is possible that the May 2007 PCE detection is an anomaly. GM proposes to collect one sample in Tenant Space 1 to evaluate whether indoor air concentrations of PCE are indeed due to vapor intrusion.

- Evaluate the indoor air quality in tenant spaces in the vicinity of Tenant Space 1, the tenant space where the highest concentrations of PCE and TCE were detected during the March 2006 and March 2007 sampling events.

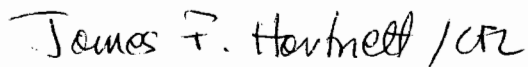
Consistent with the February 26, 2007 work plan, sampling procedures will be as outlined in the February 27, 2006 VI Investigation Work Plan. Analytical methods will be as outlined in the February 27, 2006 VI Investigation Work Plan, with the following exceptions:

- Given that one round of sampling has been conducted using a full scan of VOCs, the current sampling is proposed to be limited to those VOCs perceived to be of concern as described in Section 2.3 of the February 27, 2006 VI Investigation Work Plan and based on analytical results from the 2006 sampling. Specifically, the air samples will be submitted for laboratory analysis using Method TO-15 for the following constituents:
  - cis-1,2-Dichloroethene
  - trans-1,2-Dichloroethene
  - Ethylbenzene
  - Methylene Chloride
  - Tetrachloroethene
  - Toluene
  - Trichloroethene
  - Vinyl Chloride
  - Xylene
- Given the concentrations detected during the 2006 and 2007 rounds of indoor air samples, the target reporting limit for these constituents will be 0.1 ppbv.
- Given the concentrations detected during the 2006 and 2007 rounds of sub-slab air samples, the target reporting limit for these constituents will be 0.5 ppbv.

Analytical services will be provided by Air Toxics Ltd of Folsom, California.

With respect to the schedule for collecting the additional samples, GM proposes to conduct the indoor air and sub-slab sampling during the 2007-2008 heating season. If you have any questions, please contact Clare Leary at (315) 437-6100 or me at (315) 463-2391.

Sincerely,



James F. Hartnett  
Remedial Program Manager

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Enclosure

cc: Distribution  
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