



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

APR 23 2015

VIA ELECTRONIC MAIL AND
CERTIFIED MAIL: 7011 1150 0000 2641 2395
RETURN RECEIPT REQUESTED

REPLY TO THE ATTENTION OF:

David Favero
RACER Trust
500 Woodward Avenue, Suite 1510
Detroit, Michigan 48226

Re: Addendum to the June 2011 Request for: Resource Conservation and Recovery Act Corrective Action Complete with Controls Determination
RACER Trust Centerpoint Business Campus
Pontiac, Michigan
MID 005 356 902

Dear Mr. Favero:

I am writing in response to your October 2014 submittal entitled *Addendum to the June 2011 Request for: Resource Conservation and Recovery Act Corrective Action Complete with Controls Determination* (Addendum). The Revitalizing Auto Communities Environmental Response (RACER) Trust (the successor through bankruptcy to Motors Liquidation Company [MLC] and General Motors Corporation [GMC]) is requesting a RCRA Corrective Action Complete with Controls Determination from the United States Environmental Protection Agency for the GMC Centerpoint Business Campus located in Pontiac, Michigan, EPA ID number MID 005 356 902.

The GMC Centerpoint Business Campus (Pontiac Centerpoint Campus, Site, or Facility) and associated Areas of Interest (AOI) are shown on Figure 2.5 of the June 2011 request. The Site includes the following four RACER Trust properties:

Pontiac Assembly (MLC 1196)
Pontiac Centerpoint East (MLC 1307)
Pontiac Centerpoint Central (MLC 1305)
Pontiac Centerpoint West (MLC 1308)

A RCRA Corrective Action 3008(h) Administrative Order on Consent (5-RCRA-013-98) was signed by EPA and GMC in September 1998. This Consent Order required GMC to conduct RCRA corrective actions at the Site. EPA selected the final corrective measures for the Site in a 2006 Final Decision and, in 2007, entered into a RCRA Corrective Action 3008(h) Administrative Order on Consent (RCRA-05-2007-0009) to implement the final corrective measures.

RACER's June 2011 Request for Corrective Action Complete with Controls Determination summarized the existing Site conditions, selected Corrective Measures, and remaining Corrective Measure activities. A July 14, 2011 public meeting was held and a 60 day public comment period on

the June 2011 Request concluded on August 27, 2011 with no public comments received. In a letter dated August 3, 2011, EPA agreed that the RCRA Corrective Action at the Facility was complete with the exception of former Underground Storage Tank (UST) area (AOI 50), which would be closed under the Michigan Act 451, Part 213 regulations and include institutional controls. In an email dated March 14, 2012, RACER confirmed that EPA and MDEQ agreed to address the confirmed releases associated with AOI 50 (DUCO Stores) through the RCRA Corrective Action process. The October 2014 Addendum presents information associated with the additional actions taken at AOI 50, at an additional UST area (AOI 53A), and describes the implementation of institutional controls to address potential vapor intrusion areas at the Site.

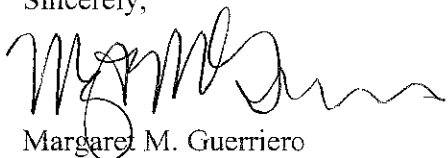
Based on the information provided in the June 2011 Corrective Action Complete with Controls Request and the October 2014 Addendum, EPA approves your request for RCRA Corrective Action Complete with Controls at the GMC Centerpoint Business Campus.

Pursuant to Paragraphs 6, 11, and 13 of the 2007 RCRA 3008(h) Administrative Order on Consent (Order), RACER must assure that the institutional controls are continually maintained. Pursuant to Paragraphs 14 and 15 of the Order, RACER shall record with the Oakland County Register of Deeds any instrument transferring complete or partial possession or ownership of the Facility through sale, lease, deed or otherwise and shall provide notice to EPA prior to any conveyance of all or part of the Facility. Pursuant to Paragraph 14.d, EPA shall be expressly named in any instrument affecting such transfer of complete or partial possession or ownership of the former GMC Centerpoint Business Campus as a third party beneficiary of the right to enforce the restrictions and covenants in the institutional controls and such instruments shall provide that EPA may directly enforce such obligations and rights against the transferee under such instrument and any successor to any such transferee.

EPA does not anticipate requiring additional corrective action at a later date so long as the institutional controls, which help assure protection of human health and the environment, are effective. Should the controls fail or new information be discovered which identifies additional risk to human health or the environment, additional action may be required. Such action might include different or additional controls, or it might involve additional cleanup.

For any questions regarding this letter, please contact Peter Ramanauskas, of my staff, at (312) 886-7890 or at ramanauskas.peter@epa.gov.

Sincerely,



Margaret M. Guerriero
Director
Land and Chemicals Division

cc: Leonard Lipinski, MDEQ
DeLores Montgomery, MDEQ
Michael McClellan, MDEQ