



January 11, 2011



James E. Davison, Managing Member
Guideco Properties, L.L.C.
P.O. Box 607
Ruston, LA 71273

Re: Ready for Reuse Determination
Guideco Properties, L.L.C.
Former Guide Facility
11000 Millhaven Road
Monroe, LA 71227 (Ouachita Parish)
LDEQ AI Number 19612

Dear Mr. Davison:

The Louisiana Department of Environmental Quality (LDEQ) and the United States Environmental Protection Agency (EPA) Region 6 together have determined that the Guideco Properties, L.L.C. Former Guide Facility in Monroe, Louisiana (the "Property") is Ready for Reuse. A Ready for Reuse Determination is an acknowledgment that environmental conditions on the property are protective of human health and the environment based on its current and anticipated future use.

The Former Guide Facility is located at 11000 Millhaven Road in Monroe (Ouachita Parish), Louisiana, just north of Interstate 20, and encompasses 182 acres in the northeast corner of Section 6, Township 17 North, Range 5 East. The Property was an automobile headlight manufacturing facility and began operations in 1975 as General Motors (GM) Inland Fisher Guide Division. GM subsequently restructured the automotive manufacturing division and the Monroe site became part of the Delphi Interior and Lighting Systems Division. Delphi was divested in the late 1990s to Guide Louisiana L.L.C. Guide operated the facility until operations ceased in January 2007.

With this Ready for Reuse Determination, LDEQ and EPA Region 6 agree that Guideco Properties, L.L.C. has successfully conducted investigation, remediation and risk management activities, and the environmental conditions at the Property are protective of human health and the environment based on its current and anticipated future use as commercial and/or industrial property. The Ready for Reuse Basis of Decision is provided as Enclosure 1 to this correspondence. Information concerning the current environmental conditions at the site and risk management activities to ensure protectiveness is summarized in Enclosure 2. Copies of relevant documents may be obtained from LDEQ at the addresses provided in Enclosure 3 to this correspondence.

Mr. James E. Davison,
Guideco Properties, LLC
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If conditions on the Property change (e.g., land use is altered or new site receptors are identified) or additional impacted media are discovered, the current owner/operator will notify LDEQ and it may become necessary to perform additional investigation and/or remediation to ensure continued protectiveness. The undersigned expressly reserve all rights and authorities to require further action by owners or operators if new or additional information is discovered that impacts this Ready for Reuse Determination, whether such information is known as of this date, or becomes available in the future.

Congratulations on this most noteworthy achievement!

Sincerely yours,



Peggy M. Hatch
Secretary
Louisiana Department of
Environmental Quality



Carl E. Edlund, P. E.
Director
Multimedia Planning and Permitting
Division, U.S. EPA, Region 6

Enclosures

**ENCLOSURE 1
READY FOR REUSE BASIS OF DECISION**

**FORMER GUIDE FACILITY
MONROE, LOUISIANA
LDEQ Area of Interest No. 19612**

INTRODUCTION

The Louisiana Department of Environmental Quality (LDEQ) Remediation and Underground Storage Tanks Division (RUSTD) and the United States Environmental Protection Agency (EPA) Region 6 together have determined that the Former Guide Facility, currently owned by Guideco Properties, L.L.C. (Guideco), in Monroe, Louisiana (the Property) is Ready for Reuse. This facility meets the criteria for a Ready for Reuse Determination because its current environmental conditions are protective of human health and the environment based upon its current and/or anticipated future use as commercial and/or industrial property. A description of the Property, background information, a summary of investigation and risk management activities, and current conditions are provided in the following sections.

PROPERTY DESCRIPTION

The Former Guide Facility is located at 11000 Millhaven Road in Monroe, Louisiana (Ouachita Parish), just north of Interstate 20, in the northeast corner of Section 6, Township 17 North, Range 5 East. The site was an automobile headlight manufacturing facility consisting of an approximately 425,000 square foot manufacturing/distribution building located on approximately 182.2 acres (Figure 1). Additional site infrastructure located north of the manufacturing building consisted of a stormwater retention pond, a fire suppression pump house and storage tanks, an electrical substation and electrical building, a waste water treatment plant, and a cooling tower. Two cold storage rooms and a vacuum pump room were located west of the southern portion of the building. Railroad spurs of the Kansas City Southern Railroad are located west of the manufacturing building and lead into the northwestern area of the building. Approximately 60 percent of the property is developed. Bennett Bayou crosses the property on the western part from north to south. A detailed legal description of the facility area included in this determination may be found in a conveyance notification filed on behalf of Guideco Properties, L.L.C. with the Ouachita Parish Clerk of Court on May 4, 2004.

BACKGROUND INFORMATION

The Guideco facility was constructed in 1974 and began operations in 1975 as General Motors (GM) Inland Fisher Guide Division. Previously, the land was undeveloped woodland or used for agriculture. GM subsequently restructured the automotive manufacturing division and the Monroe site became part of the Delphi Interior and Lighting Systems Division. Delphi was divested in the late 1990s to Guide Louisiana L.L.C. Guide operated the facility until operations ceased in January 2007. The facility was decommissioned by June 2007. A final deactivation report was submitted to GM on June 12, 2007. Guideco Properties, L.L.C. is the current owner of the Property.

ASSESSMENT AND RISK EVALUATION

The assessment and remediation of the facility may be divided chronologically into two phases: activities performed from 1998 to 2005, and activities performed from 2008 to 2010.

1998 to 2005

Multiple environmental assessments were conducted at the site as a result of the property divestiture from GM to Guideco. A Phase I Environmental Site Assessment conducted in 1998 by EMCON identified two areas of potential concern: the railroad spur area and the solvent recovery area. However, the findings of a Phase II Environmental Site Assessment by EMCON in April 1998 showed that no impact was present and no further action was required.

GM reported the presence of subsurface chemical constituents to LDEQ in a letter dated August 7, 1998. A sampling workplan, dated October 1, 1998, was submitted and approved by LDEQ on October 28, 1998. Data from the resulting report, dated November 25, 1999, was evaluated in accordance with LDEQ's Risk Evaluation and Corrective Action Program (RECAP) using Management Option 2. The RECAP report was submitted to LDEQ in April 2000. One large Area of Investigation (AOI) was proposed, to include the manufacturing plant building and the area located a short distance beyond each groundwater well with detected contaminant concentrations. Additional sampling to better delineate the concentrations of Constituents of Concern (COCs) in soil and groundwater and define the AOI was conducted in 2002. Two AOIs were subsequently identified: AOI 1, Press Pit Area and AOI 2, GM-2 Area (Figure 1). Interim corrective measures were performed at both locations.

The Press Pit Area is located in the manufacturing plant building. Guide ceased operation of all six headlight assembly presses in AOI 1 by December 2002. Each press included a below-grade, concrete pit designed to collect and contain excess metal and cutting fluids from press operations. The pits were decommissioned by removal of the contents for off-site disposal or recycling, high pressure steam cleaning of the interior of the empty pits, backfilling of the clean empty pits with clean imported natural fill, then capping of the area with a minimum eight-inch thick, steel reinforced concrete. During the decommissioning process, soil borings were advanced through the base of and around each pit.

The GM-2 Area is an area of the plant near several aboveground storage tanks. General Motors implemented a project to excavate impacted soil at AOI 2 on December 17, 2002. The area was excavated to a depth of five feet and approximately 1,810 cubic yards of soil were disposed of at Waste Management's Magnolia commercial solid waste disposal facility.

A Management Option 2 RECAP Report evaluating the remaining COC concentrations at the AOIs was submitted to LDEQ in June 2003. Based upon the 2000 and 2003 evaluations, LDEQ concurred that residual contaminant concentrations at the AOIs did not exceed the Limiting RECAP Standards (LRS) established for the facility. Because the remedial standards were based on an industrial exposure scenario, LDEQ required that a conveyance notification be filed in the Clerk of Court of Ouachita Parish in its letter of December 2, 2003. The conveyance

notice was filed May 4, 2004 by Guide Corporation, and a final inspection of the site was completed by LDEQ on March 15, 2005. LDEQ issued a determination of "No Further Action – At This Time" (NFA-ATT) for these two AOIs on April 27, 2005. Only two COCs, 1,1-Dichloroethene, and Benzo(a)pyrene, had residual concentrations exceeding RECAP screening standards, and are discussed in Enclosure 2, Current Conditions Table.

2008 to 2010

Renewed interest in bringing another industry to the closed Guideco facility resulted in further assessment and remediation. A Phase 1 Environmental Site Assessment was performed in 2008 by PPM Consultants Inc. on behalf of Louisiana Economic Development (LEC), Technology Industry Group. The assessment included interviews, records reviews and a site reconnaissance in order to identify recognized current and historical environmental conditions. The resulting report, dated October 17, 2008, was submitted to LEC and LDEQ. Based upon this information, LDEQ identified three specific areas of concern: the autophoretic bake oven, a leaking n-butyl acetate piping system vent in the ceiling in the former Molding Operations Area, and press oil/drawing compound seepage spots in the former Injection Molding Operations Area. LDEQ requested assessment and remediation of these areas in a letter dated February 19, 2009.

(1) Autophoretic bake oven

The autophoretic bake oven, mounted on the ceiling in the northeastern portion of the site building, was used in the chromium-coating process. The oven was removed under the supervision of an industrial hygienist following OSHA exposure guidance. Bulk TCLP samples were non-detect for chromium and the oven was disposed of as scrap metal on October 29, 2009 at Arkla Recycling (West Monroe).

(2) Leaking n-butyl acetate piping system vent in ceiling in the former Molding Operations Area

A liquid was observed leaking through a plastic covering of an n-butyl acetate piping system vent and pooling on the floor in the north central portion of the former Molding Operations area. After the floor area was cleaned, the roof acetate ductwork system was inspected by ALTEC and found to be in good structural condition. A sample collected from an area east of Access Hatch #7 did not contain n-butyl acetate. The entire n-butyl acetate piping system was removed, and the piping disposed of as scrap metal on October 21, 2009, at Concordia Metals (Ferriday).

(3) Press oil/drawing compound seepage in the former Injection Molding Operations Area (also known as AOI 6, HR-6(1) in the January 28, 2010 Remediation Work Plan)

The former Injection Molding Operations area, located in the southern portion of the site building, had seeps of suspected press oil/drawing compound around cracks and joints in the concrete floor. These seeps resulted in detections of Total Petroleum Hydrocarbons (TPH-D and TPH-O) in the soils under the floor. The TPH data was evaluated using the LDEQ's Risk Evaluation/Corrective Action Program (RECAP) Management Option 1 (MO-1). The concentrations exceeded the MO-1 Limiting RECAP Standards identified for the facility, and

the soil in the HR-6(1) area was excavated to a depth of eight feet. Five confirmation samples were analyzed and the residual TPH concentrations were lower than the Limiting RECAP Standards. The excavated soils were disposed at the White Oaks Landfill (Monroe).

In addition to the assessment and remediation of the three areas specified by LDEQ in 2009, a voluntary subsurface investigation was conducted by ALTEC in September and November 2009. Sample locations were based on potential problem areas identified during previous investigations conducted by others at the site. An investigation report was submitted to LDEQ dated January 19, 2010. Using the results of the investigations, ALTEC identified five Areas of Interest with contaminant concentrations in soil that exceeded the Management Option 1 Limiting RECAP Standards identified for the facility and proposed corrective action. A Soil Remediation Plan was submitted to LDEQ on January 28, 2010. Contaminated soil was excavated and samples were collected from the sidewalls and bottom of the excavation to confirm that all impacted soil had been removed. If contaminant concentrations still exceeded the LRS, additional soil was removed and the excavation resampled. Over 600 tons of soil was excavated and taken to White Oaks Landfill in Monroe, Louisiana for disposal. The excavations were backfilled with clean material. The corrective action activities were documented in the Remedial Action Completion Report dated February 10, 2010. Those AOIs with residual contaminant concentrations exceeding RECAP screening standards are included in Enclosure 2, Current Conditions Table.

CURRENT ENVIRONMENTAL CONDITIONS

A list of the maximum remaining concentrations of Constituents of Concern in soil and groundwater may be found in Enclosure 2 to the Ready for Reuse Determination letter (Environmental Conditions Table). Contact information for questions regarding the environmental conditions described in this Ready for Reuse Basis of Decision is provided in Enclosure 3 to the Ready for Reuse Determination letter.

REFERENCES

Documents related to site investigations and risk management activities at the Former Guide Facility are public records, and are available through LDEQ's Electronic Document Management System (EDMS). Contact information for obtaining access to these records is provided in Enclosure 3 to the Ready for Reuse Determination letter. A list of documents supporting this Ready for Reuse Determination Basis of Decision is provided below:

1998 *Phase I Environmental Site Assessment*; EMCON; March 1998

Phase II Environmental Site Assessment; EMCON; April 1998

Investigation at Delphi /Monroe – Notice Requirements; General Motors; August 7, 1998 [EDMS Document No. 7339442]

Delphi Interior and Lighting Systems, Monroe Plant, Phase III Work Plan; General Motors; October 1, 1998 [EDMS Document No. 7339643]

- Delphi Interior and Lighting Systems, Monroe Plant, Acknowledgement of Spill Notification and Phase III Work Plan Approval*; LDEQ; October 28, 1998 [EDMS Document No. 7339642]
- 1999 *Former Delphi Interior and Lighting Systems, Monroe, LA, Monitoring Well Installation and Groundwater Sampling Report*; CH2MHILL; November 25, 1999 [EDMS Document No. 2184711]
- 2000 *LDEQ Comments on Groundwater Monitoring Well Report Submitted 11/22/99 and Follow-up on Passive Soil Vapor Chemistry*; LDEQ; March 30, 2000 [EDMS Document No. 869467]
- Risk Evaluation/Corrective Action Submittal, Former General Motors - Delphi Facility*; IT Corporation on behalf of General Motors Corporation; April 23, 2000 [EDMS Document No. 914632]
- Response to March 30, 2000 DEQ Letter, Former GM-Delphi Facility*; General Motors; April 26, 2000 [EDMS Document No. 940913]
- LDEQ Comments on Former Delphi Plant (Monroe) RECAP Report*; LDEQ; June 21, 2000 [EDMS Document No. 139216]
- Response to June 21, 2000 Comment Letter, Former GM-Delphi Facility*; General Motors Corporation, July 28, 2000 [EDMS Document No. 3793934]
- 2003 *RECAP Evaluation Report, Former General Motors Corporation-Delphi Facility, Currently Guide Corporation LLC Facility*; Conestoga-Rovers and Associates Inc. on behalf of General Motors Corporation; June 2003 [EDMS Document Nos. 1827693 and 1827699]
- Conveyance Notice/Well Plugging and Abandonment Requirements for No Further Action*; LDEQ; December 2, 2003 [EDMS Document No. 2367425]
- 2004 *Conveyance Notification*; Guideco Properties, L.L.C.; May 4, 2004 [EDMS Document No. 2318962]
- 2005 *Former GM-Delphi (Monroe) Field Interview Form, Final Inspection for NFA*; LDEQ; March 15, 2005 [EDMS Document No. 2620184]
- No Further Action Notification, Former GM-Delphi Facility (Guide Louisiana)*; LDEQ; April 27, 2005 [EDMS Document No. 2672092]
- 2008 *Phase I Environmental Site Assessment Report, Louisiana Economic Development, Former General Motors Delphi Facility/Guide Corporation LLC Facility*; PPM Consultants, Inc.; October 17, 2008 [EDMS Document No. 3711633]

- 2009 *Request for Additional Remediation and Assessment*; LDEQ; February 19, 2009
- 2010 *Site Investigation Report*; ALTEC Environmental Consultants, Inc.; January 19, 2010 [EDMS Document Nos. 6693316 and 6693318]
- Soil Remediation Plan, V-Vehicle Project*; ALTEC Environmental Consultants, Inc.; January 28, 2010 [EDMS Document No. 6690958]
- Remedial Action Completion Report, V-Vehicle Project*; ALTEC Environmental Consultants, Inc.; February 15, 2010 [EDMS Document No. 6690955]
- Documentation of Subsurface Investigation, Risk Evaluation and Remediation, Former Guide Facility (Current V-Vehicle Project)*; ALTEC Environmental Consultants, Inc.; March 2, 2010 [EDMS Document Nos. 6693316 and 6693318]
- Response for Additional Remediation and Assessment*; ALTEC Environmental Consultants, Inc.; March 7, 2010 [EDMS Document No. 6690647]
- Ready for Reuse Evaluation in Response to 2/16/2009 Letter*; LDEQ; September 22, 2010 [EDMS Document No. 7708939]

**ENCLOSURE 2
ENVIRONMENTAL CONDITIONS TABLE**

GUIDECO PROPERTIES L.L.C. FACILITY, MONROE, LOUISIANA

Area Name/ Unit Name	Remedial Action Taken	Constituents of Concern ¹ and Maximum Levels Remaining ²	Limiting RECAP Standards	Clean-up Status	Institutional and Engineering Controls
AOI 1, Press Pit Area (2005)	Contents of pits removed for off-site disposal, high pressure steam cleaned interior backfilled pits with clean imported natural fill, capped area with a minimum eight-inch thick, steel reinforced concrete	<u>Soil:</u> 1,1,1-Trichloroethane - 34 mg/kg 1,1-Dichloroethene - 39 mg/kg Benzo(a)pyrene - 3.1 mg/kg Bromomethane - 0.46 mg/kg Chloroethane - 0.027 mg/kg cis-1,2-Dichloroethene - 1 mg/kg Dibromochloromethane - 2.4 mg/kg Methylene chloride - 0.92 mg/kg Tetrachloroethene - 4.4 mg/kg TPH-DRO - 150 mg/kg Trichloroethene - 0.64 mg/kg	<u>Soil:</u> 790 mg/kg ³ 0.78 mg/kg ⁴ 0.36 mg/kg ⁵ 2.3 mg/kg ³ 0.26 mg/kg ³ 43 mg/kg ³ 3.3 mg/kg ³ 4.8 mg/kg ³ 6.9 mg/kg ³ 3,200 mg/kg ³ 1.5 mg/kg ³	Completed NFA-ATT ⁹ 04/27/05	Engineering control at AOI 1; conveyance notification for both AOIs filed 05/04/04 in Ouachita Parish
AOI 2, GM-2 Area (2005)	Excavation of soil with off-site disposal	<u>Groundwater:</u> 1,1-Dichloroethene - 0.036 mg/L cis-1,2-Dichloroethene - 0.071 mg/L Lead - 0.025 mg/L Tetrachloroethene - 0.056 mg/L TPH-DRO - 1.2 mg/L TPH-ORO - 1.6 mg/L Trichloroethene - 0.073 mg/L Vinyl chloride - 0.0099 mg/L	<u>Groundwater:</u> 0.064 mg/L ⁶ 150 mg/L ⁷ 5.55 mg/L ⁶ 2.33 mg/L ⁶ 52 mg/L ⁷ 2,664 mg/L ⁶ 2.33 mg/L ⁶ 0.057 mg/L ⁷		
AOI 2, REC-6(14) and REC-6(17) (2010)	Excavation of concrete and soil with off-site disposal	TPH-D - 1,090 mg/kg TPH-O - 4,470 mg/kg	TPH-D - 2,550 mg/kg ⁸ TPH-O - 12,500mg/kg ⁸	Completed	Conveyance notification filed 11/23/10 in Ouachita Parish

¹ Constituents of Concern (COCs) are those contaminants present at an AOI at concentrations that exceed the RECAP Screening Standards. COC concentrations at 2010 AOIs 1, 3, 5, and 6 did not exceed nonindustrial screening standards.

- 2 AOIs 1 and 2 were evaluated together
- 3 MO-2 SOILesi
- 4 The maximum 1,1-Dichloroethene (DCE) value in soil at AOI 1 was 39 mg/kg, which exceeds the MO-2 RS for soils protective of groundwater in the 2000 RECAP evaluation for the site. Two considerations allow this DCE value to be reevaluated. First, the Environmental Protection Agency has reclassified DCE as a non-carcinogen, therefore changing its toxicity values. And secondly, the building and its slab at this site are permanent structures designed to prevent rainwater infiltration to the soils beneath them (such as at AOI 1). Therefore, the exposure pathway for soils leaching DCE to groundwater is incomplete. The building and its slab form an engineering control, which protects the groundwater.
- 5 The maximum Benzo(a)pyrene (BAP) value in soils was 3.1 mg/kg (AOI 2). During the remediation of AOI 2, discarded asphalt was identified in the soil. This asphalt is the expected source of the BAP. The Department made a determination in 2002 regarding BAP in soils containing construction materials: "It is not the intention of the Department of Environmental Quality to regulate soils impacted by commonly used construction material and practices..." (January 3, 2002 LDEQ letter, Secretary J. Dale Givens to Avondale Shipyards Inc., regarding BAP in soils).
- 6 MO-2 GW3NDW
- 7 MO-2 GWesi
- 8 MO-1 SOILi
- 9 No Further Action At This Time

**ENCLOSURE 3
READY FOR REUSE AGENCY CONTACTS**

GUIDECO PROPERTIES L.L.C. FACILITY, MONROE, LOUISIANA

For a copy of the administrative record providing detailed information regarding environmental conditions at the Guideco Properties L.L.C. Facility, please contact:

Louisiana Department of Environmental Quality
Public Records Center
Galvez Building, Room 127
602 North Fifth Street
Baton Rouge, LA 70802
(225) 219-3168

For questions regarding the environmental conditions described in the Ready for Reuse Basis of Decision for the Guideco Properties L.L.C. Facility, please contact:

Mr. David McQueen, Geologist 3
Northeast Regional Office
Remediation and Underground Storage Tanks Division
Louisiana Department of Environmental Quality
1823 Highway 546
West Monroe, LA 71292-0442
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or

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or

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On this Day, January 11, 2011,

**Louisiana Department of Environmental Quality
U.S. Environmental Protection Agency, Region 6**

Present to

**Guideco Properties, L.L.C.
Former Guide Facility, Monroe, Louisiana**

Ready for Reuse Determination

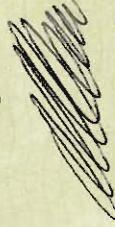
In recognition of the efforts of Guideco Properties, L.L.C. to investigate and remediate the Former Guide Facility in Monroe, Louisiana, the Louisiana Department of Environmental Quality and the United States Environmental Protection Agency, Region 6 have together determined that this property is Ready for Reuse. As documented in the Ready for Reuse Determination Letter of January 11, 2011, a Ready for Reuse Determination is an acknowledgement that environmental conditions at this facility are protective of human health and the environment based upon its current and anticipated future industrial use.




Peggy M. Hatch
Secretary
Louisiana Department of
Environmental Quality



Guideco Properties, L.L.C.



Drake Mills
Member
Guideco Properties, L.L.C.



Carl E. Edlund, P. E.
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