DELPHI SYSTEMS CORP.

CORRECTIVE MEASURES PROPOSAL

TABLE 1

SUMMARY OF SITE-SPECIFIC CLEANUP CRITERIA

TABLE 1
REMEDIATION CRITERIA FOR COMMERCIAL/INDUSTRIAL SCENARIO AND GROUNDWATER PROTECTION
FORMER DELPHI BATTERY PLANT, 1201 MAGNOLIA AVE.
ANAHEIM, CALIFORNIA
32486-011

Chemical	Human Health Risk-based Remediation Criteria	Vadose Zone Groundwater Protection Criteria
Soil (mg/kg)	**(upper 10 feet bgs)**	**(Soil in Vadose Zone at any Depth)**
Antimony	54.5	-
Arsenic	9.05 *	-
Chromium (VI)	1	-
PCBs (total)	3.82	-
Benzo(a)anthracene	0.125 (<0.250)	-
Benzo(a)pyrene	0.125 (<0.250)	-
Benzo(b)fluoranthene	0.125 (<0.250)	-
Benzo(k)fluoranthene	0.125 (<0.250)	-
Chrysene	0.125 (<0.250)	-
Indeno(1,2,3-cd)pyrene	0.125 (<0.250)	-
Lead	800 **	-
1,1,1-Trichloroethane	-	0.665
1,1,2-Trichloroethane	-	0.017
1,1-Dichloroethane	-	0.017
1,1-Dichloroethene	-	0.020
1,2,4-Trimethylbenzene	0.062	-
1,2,4-Trichlorobenzene	-	0.017
1,2-Dichloroethane	-	0.020
1,3,5-Trimethylbenzene	0.034	-
Benzene	-	0.015
Ethylbenzene	-	2.389
Naphthalene	0.174	-
Xylenes	-	6.372
Tetrachloroethene	-	0.017
Toluene	-	0.635
Soil Gas (µg/m3)	**(Depths less than 15 feet bgs)**	
1,1-Dichloroethane	13,600	-
1,1-Dichloroethene	260,000	-
1,2-Dichloropropane	2,450	-
Tetrachloroethene	5,000	-
Vinyl chloride	235	-

Notes:

* Cumulative risk-based arsenic remediation criterion lowered from 21.9 mg/kg to 9.05 mg/kg, based on recommendations made after evaluation of potential "hot spots" at the Site.

** For lead, an initial remediation criterion of 6,650 mg/kg was derived based on the post-remediation calculated 95%UCL concentration. However, Delphi has decided to set the remediation criteria to 800 mg/kg as the remediation criterion for lead at the Site to be consistent with the EPA Region IX industrial soil preliminary remediation goal (PRG).

0.125 (<0.250) = concentration remediated to below the detection limit of 0.250 mg/kg.

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TABLE 2

COMPARATIVE ANALYSIS OF REMEDIAL ALTERNATIVES

TABLE 2 – COMPARATIVE ANALYSIS OF REMEDIAL ALTERNATIVES
FORMER DELPHI BATTERY PLANT, 1201 MAGNOLIA AVE.
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Threshold and Balancing Criteria	Alternative 1: No further action	Alternative 2: Land Use Covenant and Engineering Controls	Alternative 3: Proposed Remedy	Alternative 4: Complete Soil Removal
Examples of Alternative	Do nothing.	Caps, vertical barriers, slurry walls, surface controls.	Soil and concrete removal, SVE, and MNA.	Soil removal with onsite or offsite treatment and disposal.
1. Protect Human Health and the Environment/	Is not protective of human health or the environment.	Provides increased protection of human health provided engineering controls are maintained.	Protects human health for intended use of property and prevents additional contamination of the underlying groundwater.	Very protective of human health and prevents additional contamination of the underlying groundwater.
2. Attain Media Cleanup Objectives	Cleanup objectives are not obtained.	Cleanup objectives are not obtained.	Cleanup objectives are obtained quickly by excavation and within a few years by SVE and MNA.	Cleanup objectives are obtained quickly by excavation.
3. Control Source(s) of Releases/ Reduction in Toxicity, Mobility, or Volume of Wastes	Will not reduce toxicity, mobility or volume of contaminants.	Does not reduce toxicity, or volume, may reduce mobility of contamination.	Significantly reduces volume, toxicity and mobility of contamination and significantly reduces potential risk to human health and environment.	Significantly reduces volume, toxicity and mobility of contamination and significantly reduces potential risk to human health and environment.
4. Long-term Reliability Effectiveness	Does not provide long-term effectiveness or reduce short-term risks.	Limits future land use and exposure to contaminants and may reduce short-term risks.	Removal of contamination to site specific risk-based levels from property reduces exposure and eliminates need for engineering controls and reduces short-term risks	Removal of all contaminated soils from property eliminates exposure and neither engineering controls nor land use restrictions are required.
5. Short-term Effectiveness and Short-term Risks	Does not provide short-term effectiveness.	Will allow for immediate reuse of the property.	Potential exposure to construction workers and public. A health and safety plan and dust control plan will be employed to protect construction workers and the public.	Potential exposure to construction workers and public. A health and safety plan and dust control plan will be employed to protect construction workers and the public.
6. Implementability	Requires no remedial action.	Requires approvals from State and local regulatory agencies.	Technical approach is clear and easily implementable. Requires approvals from State and local regulatory agencies.	Large, deep soil excavations to remove all contaminated soils are technically very challenging. Requires approvals from State and local regulatory agencies.
7. Cost	No cost.	Minimal cost.	Acceptable cost relative to Site redevelopment economics.	Maximum cost and may prohibit Site development feasibility.
8. State Acceptance	Not acceptable to State because contamination exceeding health risk levels would remain on site.	Not acceptable to State because contamination exceeding health risk levels would remain on site.	Acceptable to State because it addresses short-term and long-term protection of the community.	Acceptable to State because it addresses short-term and long-term protection of the community.
9. Community Acceptance	Likely not acceptable to the community because contamination will remain on property. Community acceptance will be based on comments received during 30-day public comment period.	Likely not acceptable to the community because contamination will remain on property. Community acceptance will be based on comments received during 30-day public comment period.	Likely acceptable to the community because contamination will be removed from the property. Community acceptance will be based on comments received during the 30-day public comment period.	Likely acceptable to the community because contamination will be removed from the property. Community acceptance will be based on comments received during the 30-day public comment period.