



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING



DAN WYANT
DIRECTOR

July 22, 2013

RECEIVED JUL 26 2013

Mr. David Favero
Deputy Cleanup Manager – Michigan
RACER Trust
2930 Ecorse Road
Ypsilanti, Michigan 48198

Dear Mr. Favero:

SUBJECT: RCRA Facility Investigation Report Former Romulus Engineer Center (Report) and Environmental Indicator (EI) Forms; Romulus Engineering Center, MID 000 809 905

The Department of Environmental Quality (DEQ), Office of Waste Management and Radiological Protection (OWMRP), has reviewed the April 19, 2013, Report and the associated CA725 and CA750 EI forms for the above referenced facility that were submitted by Haley & Aldrich of Michigan, Inc., on behalf of Revitalizing Auto Communities Environmental Response (RACER) Trust.

REPORT

Based on that review, the DEQ generally agrees with the findings outlined in the Report. However, the DEQ is reluctant to accept the presence of a permanent groundwater “sink” at the site based on only one round of groundwater elevation data. Additional information will be necessary to verify the existence of permanent groundwater “sink” in the vicinity of AOC-1 and AOC-2, as opposed to the “sink” being more of a seasonal feature. Specifically, at least three additional rounds of groundwater static water levels, including monitoring well TW-01-196, will need to be collected if the “sink” is to be used to demonstrate that the groundwater/surface water interface (GSI) pathway is incomplete and, therefore, the associated GSI environmental protection standards are not applicable. The static water levels should be collected during the spring, summer, and fall months as the original level data was collected during the winter.

CA725 EI FORM

While the DEQ can accept the basic premises of the CA725 EI form as the GSI exceedances are not an issue with respect to a human exposures under control determination, the form itself requires some revision. As drafted, Item 2 of the form suggests that the groundwater is not contaminated. The only other information completed is the last entry, Item 8. In reality, the groundwater and soils data both indicate arsenic above the residential and nonresidential drinking water and drinking water protection environmental protection standards referenced under R 299.9629 of the administrative rules promulgated pursuant to Part 111, Hazardous Waste Management, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended, respectively. These pathways are not applicable because the arsenic concentrations detected fall within the regional background levels for this part of Michigan. The

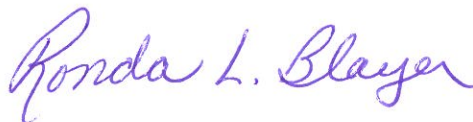
form needs to be revised to reflect the contamination and the basis for determining that an exposure to the media with exceedances does not pose a risk. Please provide the updated form within 60 days of the date of this correspondence. Transmittal via electronic mail is acceptable.

CA750 EI FORM

In order to make a determination that groundwater is under control, the continued presence of the groundwater "sink" will need to be verified as outlined above. If verified, the form will need to be modified accordingly to address the verification data, etc.

If you have any questions regarding the EI forms, please contact Mr. John McCabe, Hazardous Waste Section, OWMRP, at 517-335-4789; mccabej@michigan.gov; or you may contact me.

Sincerely,



Ronda L. Blayer
Environmental Engineering Specialist
Office of Waste Management and
Radiological Protection
517-373-9548

cc: Mr. Derek Kaiding, Haley & Aldrich of Michigan, Inc.
Ms. Noelle Grain, DEQ
Mr. Jack Schinderle, DEQ
Ms. Mary Carnagie/Mr. John McCabe, DEQ
Corrective Action File