



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF  
ENVIRONMENT, GREAT LAKES, AND ENERGY  
LANSING



LIESL EICHLER CLARK  
DIRECTOR

July 29, 2021

VIA E-MAIL

Mr. David Favero  
Deputy Cleanup Manager - Michigan  
RACER Trust  
500 Woodward Avenue, Suite 2650  
Detroit, Michigan 48226

Dear Mr. Favero:

SUBJECT: Review: *2<sup>nd</sup> Quarter Vapor Intrusion Sampling Results*; RACER Coldwater Road Landfill; Flint, Michigan; MID 005 356 860; Waste Data System Number 393431

The Michigan Department of Environment, Great Lakes, and Energy (EGLE), Materials Management Division (MMD), has reviewed the technical memo: *2<sup>nd</sup> Quarter Vapor Intrusion Sampling Results* (Memo), dated July 1, 2021, for the RACER Coldwater Road Landfill (facility), prepared by Ramboll. The Memo summarizes and provides analytical results of the vapor probe sampling collected in May 2021, for evaluating potential volatilization to indoor air pathway concerns. The Memo was reviewed for compliance with the applicable sections of Part 111, Hazardous Waste Management, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended, and its administrative rules.

Based on our review, EGLE MMD requests that RACER determine and document what the construction is of homes within 100 feet of vapor points (VP) demonstrating exceedances of the most stringent Site Specific Volatilization to Indoor Air Criteria (VP-2, VP-3, and VP-5), to see if the exceedances are a potential exposure concern requiring additional investigation. All exceedances in this and preceding sampling events are solely for the "crawlspaces with a dirt floor exposure scenario;" if RACER were to verify residences near the plume are of slab-on-grade or poured basement construction, a measured and less-urgent approach to controlling human exposure can be used. This concept was included in our December 23, 2020 letter, which stated the following:

*"... the most stringent site-specific criteria are applied to all soil gas samples; this is acceptable to demonstrate there is no expected off-site impact. However, knowledge of home construction at addresses that may be affected by volatilization to indoor air will be necessary to apply appropriate criteria should the pathway be demonstrated to exist, and may be desired to be implemented in future sampling events to more accurately compare detected soil gas concentrations to the appropriate soil gas criteria.*

Note that this would not preclude a deed restriction or some other control to restrict on-site human exposure, but verifies that a public health risk is not an immediate concern. If you have any questions, please contact me at 517-242-8496; RungeJ@Michigan.gov; or EGLE, MMD, P.O. Box 30241, Lansing, Michigan 48909-7741.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Jacob Runge', is positioned above the typed name.

Jacob Runge, Environmental Engineer  
Management and Tracking Unit  
Hazardous Waste Section  
Materials Management Division

cc: Mr. Clifford Yantz, Senior Hydrogeologist, Ramboll  
Mr. Kevin Schneider, Environmental Scientist, Ramboll  
Mr. Puneet Vij, Michigan Department of Health and Human Services  
Mr. Richard Conforti, EGLE  
Mr. John McCabe, EGLE  
Mr. Joe Rogers, EGLE  
Ms. Nicole Sanabria, EGLE  
Mr. Brian Zuber, EGLE  
Corrective Action File