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GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
SAGINAW BAY DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

February 27, 2019

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RACER Trust
Attn: Mr. David Favero
500 Woodward Ave., Ste. 2650
Detroit, Michigan 48226

Dear Mr. Favero:

SUBJECT: Non-Residential Use Risk Evaluation, Saginaw Malleable Industrial Land, Green Point Landfill, and Peninsula Properties (SMI) – Saginaw, Saginaw County, Michigan, MERA No. 73000014

The Department of Environmental Quality (DEQ), Remediation and Redevelopment Division (RRD), has reviewed the Non-Residential Use Risk Evaluation (Report) submitted by Arcadis of Michigan, LLC (Arcadis) on behalf of Revitalizing Auto Communities Environmental Response (RACER) Trust dated October 10, 2018 and Addendum 1 to the Report dated February 15, 2019. The documents were submitted under Section 20120b of Part 201 of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (NREPA) in order to seek DEQ approval for use of site-specific non-residential use criteria for the SMI site. Multiple meetings and correspondence have taken place between the DEQ, RACER Trust, and Arcadis in order to ensure the proposed criteria and associated non-residential use risk evaluation adequately evaluated potential exposure risks to public health posed by the hazardous substances or other factors, as required by Section 20120b.

In compliance with Section 20120b(1), the criteria proposed for site-specific use at SMI more accurately reflect best available information for toxicity or exposure risk. Many of the current Part 201 Generic Cleanup Criteria established in 2013, were developed using older scientific information. The site-specific values proposed for use are the draft 2017 values documented in Addendum 1 of the Report and the site-specific Volatilization to Indoor Air Criteria documented within Appendix C, *Vapor Intrusion Screening Memo*, of the Report. Site-specific Volatile Soil Inhalation and Particulate Soil Inhalation criteria were also calculated for select parameters using additional adjustments for a 400-acre source and a 12-hour work day. These criteria are documented in Table 1, *Summary of Maximum Detected Concentrations Compared to Site-Specific Non-Residential Criteria*, of the Report.

Contaminants of potential concern included in the risk evaluation portion of the Report were selected based upon comparison of soil data to the proposed site-specific non-residential criteria. The exposure pathways evaluated were based upon potential exposure to soil by an adult non-residential worker; including exposure through incidental ingestion, dermal contact, and inhalation of particulates in ambient air. Additional contaminants of concern and potential exposure pathways, such as the drinking water pathway, were not included in the risk evaluation. As explained in the Report, many of the additional concerns not specifically included in this risk evaluation will be addressed by proposed Declaration of Restrictive Covenants (DRCs) to be recorded for the site. The DRCs will include groundwater use restrictions, construction limitations and requirements for future buildings, soil handling and management requirements, land use restrictions, and several other site stipulations.

As a result of our review the DEQ concurs with the general approach used to develop the proposed site-specific non-residential criteria and to evaluate select human health exposure pathways for the SMI site. Justifications and explanations were provided in the Report to support the assumptions and methodologies used to develop the site-specific non-residential criteria and to complete the non-residential use risk evaluations. The proposed site-specific criteria are approved for use at this site.

All information and determinations presented by the RRD in this letter are based on information currently known to RRD staff. The discovery of new information regarding environmental conditions or regulated substances at the facility that are not known to the RRD at the date of this letter may result in a request by the RRD for additional response activities. Such request(s) will be based on the need to protect the public health, safety, and welfare or the environment. If you have any questions regarding this letter, please contact Amanda Armbruster, Project Manager, at 989-894-6242; armbrustera@michigan.gov; or DEQ, 401 Ketchum Street, Suite B, Bay City, Michigan 48708; or you may contact me.

Sincerely,



Ann M. Person, District Supervisor
Saginaw Bay District Office
Remediation and Redevelopment Division
989-894-6248
persona@michigan.gov

cc: Mr. Scott Clearwater, Arcadis
Mr. Kirk Lapham, DNR
Ms. Divinia Ries, DEQ
Ms. Amanda Armbruster, DEQ