



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING



KEITH CREAUGH
DIRECTOR

Received
7/22/2016

July 13, 2016

Mr. Dave Favero
RACER Trust
500 Woodward Avenue
Suite 1510
Detroit, Michigan 48226

Dear Mr. Favero:

SUBJECT: Comments on Supplemental RFI Groundwater Monitoring Annual Monitoring Report; RACER Former Peregrine, Inc., Coldwater Road Facility, Genesee Township, Michigan; MIR 000 020 743

The staff of the Department of Environmental Quality (DEQ), Office of Waste Management and Radiological Protection (OWMRP), has received and reviewed the June 9, 2016, Supplemental Resource Conservation and Recovery Act Facility Investigation (RFI) Groundwater Monitoring Annual Monitoring Report (Report) for the RACER Former Peregrine, Inc., Coldwater Road Facility (Facility) prepared by GHD Limited. The Report was reviewed for compliance with the applicable provisions of Part 111, Hazardous Waste Management, and Part 201, Environmental Remediation, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended, and its administrative rules, Michigan Administrative Code R 299.5101 *et seq*, and the Supplemental RFI Groundwater Investigation Work Plan and Groundwater Monitoring Plan, which was approved by the DEQ on October 15, 2013.

Based on our review, the OWMRP has the comments provided below. Please provide a written response to the comments within 30 days of receipt of this letter.

1. The OWMRP is not in agreement with the recommendation provided in Section 4 of the Report to discontinue analysis for volatile organic compounds (VOCs) in the 2017 annual sampling event. RACER should continue to analyze for VOCs in the annual event through next year as specified in the approved plan. As specified in the plan, groundwater monitoring requirements will be re-evaluated following the 3-year monitoring period that will conclude with the 2017 annual monitoring event in the first quarter of 2017.
2. The Report states that MW-16-10 was not sampled in the annual event due to "equipment failure." Although the OWMRP understands that MW-16-10 will be sampled as part of the second quarter event in 2016, it should be noted that it is the OWMRP's opinion that equipment failure is not a valid justification for failure to sample a well in a quarterly event. In future monitoring events, the OWMRP expects that replacement equipment will be procured in a timely manner so that the well can be sampled as part of the quarterly event as scheduled.
3. Given that the facility was formerly a large plating facility, including chrome plating, it is likely that perfluorinated chemicals (PFCs), including perfluorooctanoic acid (PFOA) and perfluorooctane sulfonate (PFOS) compounds were used as a mist suppressant in the plating operations. PFCs, including PFOA and PFOS, are emerging contaminants of

concern whose presence at the Facility has not yet been investigated. Therefore, the Facility must provide a proposed plan to investigate for their presence in groundwater at the Facility.

For additional information regarding PFCs, PFOA, and PFOS, please refer to the August 2015 Association of State and Territorial Solid Waste Management Officials (ASTWMO) Information Paper Titled "Perfluorinated Chemicals (PFCs): Perfluorooctanoic Acid (PFOA) & Perfluorooctane Sulfonate (PFOS)" located at:

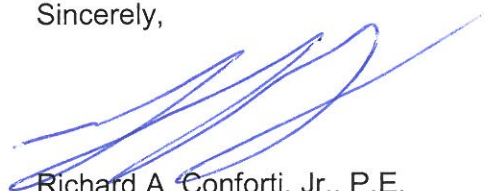
http://astswmo.org/files/policies/Federal_Facilities/2015-08-ASTSWMO-PFCs-IssuePaper-Final.pdf.

Additional references that may be useful include: The United States Environmental Protection Agency (EPA) PFOS Chromium Electroplater Study put together by Region 5 in 2009 located at http://www.in.gov/idem/ctap/files/plating_chromium_pfos_study.pdf. The study includes similar site conditions from Chicago and Cleveland area sites and could be useful for the PFC investigation. Also, the May 2016 United States EPA Drinking Water Health Advisory for PFOS, document EPA 822-R-16-004, and the Drinking Water Health Advisory for PFOA, document EPA 822-R-16-005 located at: https://www.epa.gov/sites/production/files/2016-05/documents/pfoa_health_advisory_final_508.pdf

PFOA and PFOS are separate documents (both PFOA and PFOS have the same drinking water advisory value = 0.07 ug/L).

Should you require further information, please contact me at the number below; or you may contact Mr. Joseph Rogers at 517-284-6569; or DEQ, OWMRP, P.O. Box 30241, Lansing, Michigan 48909-7741.

Sincerely,



Richard A. Conforti, Jr., P.E.
Hazardous Waste Section
Office of Waste Management and
Radiological Protection
517-284-6558

cc: Mr. Grant Trigger, RACER Trust
Mr. Mike Tomka, GHD Limited
Mr. Bryan Grochowski, DEQ
Ms. De Montgomery/Mr. Al Taylor, DEQ
Mr. Joseph Rogers/Mr. John McCabe, DEQ
Corrective Action File