



SUBJECT Proposed Fiero Well Abandonment **TO** Peter Ramanauskas U.S. Environmental Protection Agency Region 5 77 West Jackson Boulevard LU-9J Chicago, Illinois 60604-3590

DATE April 8, 2022

DEPARTMENT Environment

COPIES TO Dave Favero, RACER Trust and Project File PROJECT NUMBER 30112891

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As you are aware the current owner of the northern portion of the Fiero properties, Green for Life (GFL), is in the process of constructing additions to existing structures and building new structures on their property. **Figure 1** shows the existing and planned structures. The addition of a tipping building (within the northern portion of area of interest [AOI] F-16) includes two monitoring wells, MWF16-03 and MWF16-10 in the building footprint. Additionally, MWF16-11 is located within an area of ongoing construction. Based on a March 21, 2022 site visit, these monitoring wells could not be located using a surveyor, metal detector, and hand digging. As such these three monitoring wells are confirmed not able to be located and do not warrant further action. MWF16-03, MWF16-10, and MWF16-11 were installed in 2004 and 2005, respectively, to assess impacts to groundwater within the former Plant 17 footprint.

In addition, the below listed monitoring wells that are included in the temporary Fiero monitoring plan could not be visually located on March 10, 2022. To locate the wells, a surveyor was used as well as metal detector and hand digging on March 21, 2022 (**Figure 2**):

- MWF16-01 Located after hand digging
- MWF16-09 Located but damaged and not able to be used for monitoring
- MWF16-17 Located after trailer moved by GFL
- MWF16-12 Located after hand digging
- MWF16-20 Location currently covered by large pile of rubble not located
- MWF16-19 Located after hand digging
- MWF16-07 Located after hand digging

With regards to MWF16-03 and MWF16-10, MWF16-03 is located north of former Plant 17 and has been sampled twice since its installation, once in 2004 and once in 2005 (**Figure 3**). The well was installed as part of the Resource Conservation Recovery Act (RCRA) Facility Investigation (RFI) Work Plan Addendum Number 13 Fiero (Plant 17) Sewer and Subsurface Investigation (ENCORE 2004). The purpose of the well was to assess potential impacts to soil and groundwater from the storm sewer system. Analytical results from both samples showed detections of ethylbenzene, toluene, and xylenes. The results did not exceed any criteria at the time and the historical data only exceed the current Residential Fiero Site Specific Vapor Intrusion Criteria (SSVIC) values. No chlorinated compounds were detected in either sample. Currently, MWF16-03 is not included in annual sampling or gauging and is only used as a northern delineation point for the chlorinated impacts present on the Fiero properties. MWF16-03 is located approximately 300 feet south of the residential properties in the northern portion

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of the Site. Additionally, groundwater flow at the Site is observed to be toward the southwest; therefore, migration of constituents of concern (COC) would not be expected to migrate north toward the residential properties. There are other nearby existing monitoring wells that have historically been non-detect to COCs detected below criteria, such as the following, which could serve as delineation points (**Figure 3**).

- MWF16-08 (northeast and abandoned) 2005/2006 non-detect for volatile organic compounds (VOCs)
- MWF8-01 (northeast near property boundary) historically and in 2021 non-detect for VOCs and part of annual groundwater monitoring program
- MWF16-09 (east but damaged) 2005, low-level detections of tetrachloroethylene (PCE) but well below criteria; 2006 non-detect
- MWF2 (northwest near property boundary) 2001/2002 low level detections of BTEX but well below criteria
- MWF16-01 (west near existing building) 2004/2006/2021 non-detect

Given that MWF16-03 is in the tipping building footprint, is not proposed for regular monitoring and sampling, is greater than 100 feet from the property boundary, and historical and current results show COCs as non-detect or below criteria for monitoring wells to the west, north and east of MW16-03, replacement of this well following construction of the tipping building is not warranted.

As noted previously MWF16-09 was damaged during GFL construction activities and is unable to be used for monitoring. This monitoring well was scheduled to be utilized for gauging only during the Fiero Temporary Monitoring Plan but is not used in the annual monitoring plan for the Site. The screen interval for MWF16-09 is from 21.5 feet to 31.5 feet bgs and the screen interval for MWF8-01 (located northeast of MWF16-09) is 18 feet to 28 feet bgs. Therefore, due to the proximity of MWF8-01 to MWF16-09 and similar screen intervals, MWF16-09 is proposed to be properly abandoned and MWF8-01 will be used for gauging purposes during the Fiero Temporary Monitoring Program.

MWF16-10 and MWF16-11 are located within the north central portion of the former Plant 17 footprint and have been sampled four and six times, respectively, most recently in 2021 (**Figure 3**). Based on a review of available documents, it appears the wells were installed as part of the Fiero Sewer and Subsurface Investigation with the purpose of monitoring potential impacts to soil and groundwater. Analytical results from each sample collected from MWF16-10 and MWF16-11 showed detections of PCE. All results are below the generic criteria and Fiero SSVIAC. Currently, MWF16-10 and MWF16-11 are gauged annually as part of the annual monitoring plan and are used in generating the site-wide groundwater contours. In addition, there are no other nearby wells that could serve the roles of MWF16-10 and MWF16-11 as the wells are used to define our current understanding of the chlorinated groundwater impacts. Furthermore, both wells are included in the Fiero Temporary Monitoring Program on a semi-annual sampling basis for 2022. After GFL completes its construction in this area, we will coordinate with GFL to find locations near to the original locations to install two replacement wells so they can continue to provide data for this portion of the Site.

References

ENCORE. 2004. RCRA Facility Investigation Work Plan Addendum Number 13 Fiero (Plant 17) Sewer and Subsurface Investigations. September 24, 2004.

Attachments **Figure 1** – GFL Layout; **Figure 2** – Fiero Temporary Monitoring Plan; **Figure 3** – Former Fiero Groundwater and Soil Vapor Analytical Summary



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	SOIL VAPOR MONITORING POINT
۲	MONITORING WELL (EXISTING)
\bigcirc	MONITORING WELL (FORMER)
•	SOIL BORING
	VOCS LISTED WERE SAMPLED BUT NO DETECTED IN THIS WELL
	CATCH BASIN
$^{\odot}$	MANHOLE
٢	FIRE HYDRANT
	GAS LINE
	SANITARY
	STORM SEWER



WATER LINE 100 FT VAPOR INTRUSION BUFFER ZONE F15 AREA OF INTEREST (AOI)

RESIDENTIAL STRUCTURES WITH FINISHED BASEMENTS

- TRICHLOROETHENE CONCENTRATION IN GROUNDWATER (> OR = TO 8.1 µg/L)
- TETRACHLOROETHENE CONCENTRATION IN GROUNDWATER (> OR = TO 130 µg/L)

CURRENT OR FORMER RACER PROPERTY

Volatile Organics	Residential Fiero SSVIAC Slab On Grade	Residential Fiero SSVIAC BASE	Non Residential Fiero SSVIAC <50k Slab On Grade	Non Residential Fiero SSVIAC <50k BASE	Non Residential Fiero SSVIAC >50k Slab On Grade	Non Residential Fiero SSVIAC >50k BASE
1,1-Dichloroethene	410	220	8,300	3,800	13,000	5,700
cis-1,2-Dichloroethene	110	62	2,300	1,100	3,500	1,600
trans-1,2-Dichloroethene	480	260	9,800	4,500	15,000	6,700
Tetrachloroethene	250	130	3,400	1,500	5,000	2,200
Trichloroethene	15	8.1	210	93	310	140

Volatile Organics	Fiero SSVIAC Soil Gas Residential Slab-on- grade	Fiero SSVIAC Soil Gas Residential Basement	
Tetrachloroethene	1,400	1,400	
Trichloroethene	67	67	

NOTES:

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1. ALL GROUNDWATER CONCENTRATIONS ARE PRESENTED IN MICROGRAMS PER LITER (µg/L).

2. ALL SOIL GAS CONCENTRATIONS ARE PRESENTED IN MICROGRAMS PER CUBIC METER (µg/m³)

3. DUPLICATE ANALYSES ARE PRESENTED IN BRACKETS.

4. ONLY DETECTIONS OF CHLORINATED VOCS LISTED ABOVE IN ANALYTICAL DATA ARE SHOWN. AT LEAST ONE DATA POINT SHOWN FOR EACH YEAR, SOME SEMI-ANNUAL DATA OMMITED FOR VISUAL EASE.

5. SSVIAC - SITE SPECIFIC VOLATILIZATION TO INDOOR AIR CRITERIA.

6. "Y" - ELEVATED REPORTING LIMIT DUE TO HIGH TARGET CONCENTRATION.

7. "J" - ESTIMATED CONCENTRATION

8. "U" CONSTITUENT NOT DETECTED; ASSOCIATED REPORTING LIMIT DETECTED.

9. "r" THIS ANALYTE IS BEING REPORTED AS THE BEST RESULTS FROM MULTIPLE RUNS.

10. CRITERIA FROM THE EGLE FORMER FIERO ASSEMBLY SITE-SPECIFIC CRITERIA EVALUATION DATED APRIL 21, 2020.

11. UTILITIES ON FIGURE ARE ONLY SHOWN IN VICINITY OF SOUTHWESTERN PROPERTY BOUNDARY.



RACER TRUST PONTIAC NORTH CAMPUS PONTIAC, MICHIGAN

FORMER FIERO GROUNDWATER AND SOIL VAPOR ANALYTICAL SUMMARY



