



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

VIA ELECTRONIC MAIL

David Favero
RACER Trust
1505 Woodward Avenue, Suite 200
Detroit, Michigan 48226

Re: Revitalizing Auto Communities Environmental Response Trust (RACER)
Pontiac North Campus - Joslyn-Wesbrook North Parcel
Screening Investigation Report
No Further Action Request

Dear Mr. Favero:

I am writing in response to RACER's August 3, 2021 *Joslyn-Wesbrook North Parcel Screening Investigation Report* (Report), submitted on your behalf by Arcadis. The Report describes the results of environmental investigation activities conducted by Arcadis at a vacant 0.455-acre parcel (Parcel ID 14-21-203-001) in the vicinity of the RACER Pontiac North Campus Site (PNC) in Pontiac, Michigan. The parcel (North Parcel or Site) is bounded to the west by Joslyn Avenue, north by Lebaron Avenue, south by Wesbrook Street, and east by residential properties. The North Parcel is owned by RACER Properties, LLC, a wholly owned subsidiary of RACER. The North Parcel is within the City of Pontiac and zoned for P-1 Parking, with current use identified as Class 202 Commercial (Vacant).

The North Parcel is one of two vacant parcels, one located at the northeast corner of Joslyn and Lenox Avenues (parcel 14-21-205-001) and one at the northeast corner of Joslyn and Lebaron Avenue (parcel 14-21-203-001), that were both formerly owned by the General Motors Corporation (GMC), which operated the adjacent GMC Pontiac North Campus manufacturing facility. The Joslyn Avenue parcels were transferred to RACER Trust together with portions of the Pontiac North Campus facility through the settlement of GMC's bankruptcy in 2011. As presented in the January 19, 2021 *Joslyn Avenue Parcels Historical Summary Memorandum and Request for Determination for Parcels Not Being Regulated Under RCRA [Resource Conservation and Recovery Act], including Corrective Action, and Not Being Covered Under Administrative Order on Consent RCRA-05-2011-00019* Memorandum, RACER's review of historic aerial photos and City Directory reports found that the North Parcel appeared vacant from 1937 through 1949 with structures present from 1952 to 1972. City Directory information from 1950 to 1995 included listings identifying private ownership and businesses listings indicating barber/beauty shops and a dry cleaner. Based on the available historical information collected by RACER related to the Joslyn Avenue parcels, there was no indication that former GMC Pontiac North Campus manufacturing operations were conducted at either parcel. In correspondence dated March 3, 2021, USEPA determined that the two Joslyn Avenue parcels were not included as part of the

former GMC Pontiac North Campus facility and would not appear to be subject to RCRA.

To confirm North Parcel environmental conditions given the former dry-cleaning operations at the Site, RACER performed additional environmental investigation using funding allotted to the RACER PNC parcels under the Environmental Response Trust Consent Decree and Settlement Agreement, Chapter 11, Case No. 09-50026 (Agreement) and the USEPA-approved RACER PNC budget.

Five soil borings were placed at locations to best identify potential impacts at historic structures, assess groundwater flow direction across the North Parcel, and assess site conditions near the property boundaries closest to potential off-site receptors. Soil borings were advanced to depths ranging from 16 to 20 feet below ground surface. Soil cores were continuously screened for volatile organic compounds (VOCs) using a photoionization detector (PID). No PID detections exceeded the PID's detection limit. Soil samples were collected from each boring location from the first interval above the first encountered saturated zone. Temporary groundwater monitoring wells were placed at each of the five soil boring locations. Groundwater samples were collected from each of the five locations and analyzed for VOCs.

Soil and groundwater analytical results were compared to Michigan Department of Environment, Great Lakes, and Energy (EGLE) Nonresidential Cleanup Criteria based on current zoning and usage of the Site and RACER's objective of obtaining a No Further Action for Nonresidential Use Determination. The results were also compared to Residential Cleanup Criteria for reference purposes.¹ There were no detections of VOCs in any of the soil samples collected. There were no detections of VOCs in groundwater samples collected at 4 locations. At one location, ethylbenzene was the only VOC detected in groundwater at the detection limit of 1 microgram per liter (ug/L), which does not exceed any of the EGLE Cleanup Criteria.

The Report indicates that RACER intends to, at a minimum, record the following institutional control restrictions on the North Parcel using a Declaration of Restrictive Covenant (DRC): limit the use of the property to commercial or industrial uses (non-residential), prohibit installation of wells and use of groundwater, require soil management, and soil vapor management for future use.

Based upon the information provided, the USEPA RCRA Corrective Action program has determined that No Further Action is required for nonresidential use of this Site. RACER will prepare and submit a draft DRC for USEPA and EGLE review.

This letter does not preclude USEPA from undertaking any action at the Site if USEPA obtains information indicating that such action is necessary to protect human health or the environment. This letter does not in any way constrain the State of Michigan with respect to any potential requirements that the State might deem appropriate at the North Parcel.

¹ EGLE Clean Up Criteria Requirements Soil & Groundwater Residential and Nonresidential, Part 201 Generic Cleanup Criteria and Screening Levels, December 21, 2020; Residential and Nonresidential Volatilization to Indoor Air Pathway Screening Levels - September 4, 2020 Guidance Document for the Vapor Intrusion Pathway, Appendices C & D - Tables 1 and 2.

If you have any additional questions, or wish to discuss this information, please feel free to contact me at (312) 886-6945 or Mr. Peter Ramanauskas of my staff at (312) 886-7890.

Sincerely,

9/29/2021

X Jose G Cisneros

Jose G. Cisneros

Chief, Remediation Branch

Signed by: JOSE CISNEROS

Jose G. Cisneros, Chief
Remediation Branch
Land, Chemicals & Redevelopment Division

cc: Kimberly Tyson, EGLE
Emily Bertolini, EGLE
Mark Koller, ORC