

Our ref: 12602792-LTR-19

July 31, 2024

Clay Joupperi
Michigan Department of Environmental Great Lakes & Energy
Remediation and Redevelopment Division – Jackson District Office
301 East Louis Glick Highway
Jackson, Michigan 49201-1556

**2024 Proposed Well Abandonment Figure Update
Former Willow Run Powertrain Plant
Ypsilanti, Michigan**

Dear Mr. Joupperi:

GHD has prepared this letter on behalf of Revitalizing Auto Communities Environmental Response (RACER) Trust as part of the ongoing Resource Conservation and Recovery Act (RCRA) Corrective Action (CA) at the Willow Run Powertrain site (Site) in Ypsilanti, Michigan. During our virtual meeting on June 27th, we discussed the *2024 Proposed Well Abandonment Update* letter submitted on May 2, 2024. Based on that conversation, this letter provides updated figures (attached) to facilitate the review of the proposed scope of work. A brief description of each figure attached is presented below.

Figure 1 provides a summary of monitoring well locations on and near the Yankee Are Museum (YAM) portion of the Site:

- Red locations: wells proposed for abandonment
- Blue locations: wells not currently proposed to be abandoned that are located on YAM property
- Orange locations: wells not currently proposed to be abandoned that are located on Wayne County Airport Authority (WCAA) property
- Grey locations: wells that are non-existing/damaged (gray wells) on YAM property, no action proposed
- Black locations: wells that are located on the American Center for Mobility (ACM) property and are not part of this initial abandonment scope of work

Figure 1A shows the well network that will remain following the proposed abandonment scope of work. Proposed wells for abandonment are not shown.

Figure 1B shows only the monitoring well locations on YAM property proposed for abandonment.

Figure 2 shows the only the deep monitoring well locations proposed for abandonment across the Site.

Figure 3 highlights the monitoring well locations that will remain for ongoing PCE evaluation, which includes groundwater sampling and/or water level measurements.

Figure 4 highlights the monitoring well locations that will remain for ongoing PFAS evaluations.

For ease of reference, Table 1 from the *2024 Proposed Well Abandonment Update* letter is attached. This letter serves as supplement to the May 2, 2024 *2024 Proposed Well Abandonment Update* letter and should be reviewed together.

Please feel free to reach out with any questions.

Regards,



Lauren Kaltz
Graduate Environmental Engineer
+1 248 893-3441
lauren.kaltz@ghd.com
DB/Is/LTR-19



Daniel Beck
Project Manager
+1 248 893-3383
daniel.beck@ghd.com

Copy to: Ashley Lesser, EGLE
Chris Svoboda, EGLE
Robert Hare, RACER
Grant Trigger, RACER
Beth Landale, GHD

Table 1

Proposed 2024 Well Abandonment Plan
Former Willow Run Powertrain Site
Ypsilanti, Michigan

Property	Monitoring Location	Groundwater Zone	GW Quality - Perimeter (2021 - 2023) (VOCs, SVOCs, Metals)	GW Quality and Levels - PCE Area (VOCs)	LNAPL Stability	LNAPL - NSZDMI	GW Flow - French Drain	GW Flow / Elevation NW Infiltration Area	GW Flow - Sitewide	Annual Sampling List	Sampled for PFAS?	2024 Proposed Abandonment	Abandonment Notes / Rationale (No Specific Use + ...)	Stratigraphy & Instrumentation Log?	Well Type (SU,FM,Vault, A/B)
YAM	CRA-027R	Shallow					Y		Y			Y	Abandon 2024	No	FM
YAM	CRA-106M	Shallow	Y	Y	Y		Y		Y	Y	Y		Keep for PCE Area Evaluation	No	FM
YAM	CRA-107M	Shallow		Y							Y		Keep for PCE Area Evaluation	Yes	FM
YAM	CRA-124M	Shallow				Y	Y		Y			Y	Abandon 2024	Yes	FM
YAM	CRA-129M	Shallow									Y		Keep for PFAS sampling	Yes	FM
YAM	CRA-133M	Shallow				Y	Y		Y			Y	Abandon 2024	Yes	FM
YAM	CRA-224M	Shallow									Y	Y	Abandon 2024	No	FM
YAM	CRA-225M	Shallow				Y	Y		Y				Keep for PFAS sampling	No	FM
YAM	CRA-239M	Shallow					Y		Y		Y	Y	Abandon 2024	No	FM
YAM	CRA-315M	Shallow					Y		Y		Y	Y	Abandon 2024	Yes	FM
YAM	CRA-611M	Shallow			Y		Y		Y		Y		Keep for PFAS sampling	Yes	FM
YAM	CRA-612M	Shallow					Y		Y				Keep for PFAS sampling	Yes	FM
YAM	CRA-613M	Shallow	Y		Y		Y		Y	Y	Y		Keep for PFAS sampling	Yes	FM
YAM	CRA-614M	Shallow			Y		Y		Y		Y		Keep for PFAS sampling	Yes	FM
YAM	CRA-615M	Shallow	Y		Y	Y	Y		Y	Y			Keep for PFAS sampling	Yes	FM
YAM	CRA-616M	Shallow				Y	Y		Y		Y		Keep for PFAS sampling	Yes	FM
YAM	CRA-756M	Shallow	Y	Y	Y		Y		Y	Y	Y		Keep for PCE Area Evaluation	Yes	FM
YAM	CRA-805M	Shallow									Y		Keep for PFAS sampling	Yes	FM
YAM	CRA-806M	Shallow	Y	Y	Y		Y		Y	Y	Y		Keep for PCE Area Evaluation	Yes	FM
YAM	CRA-827ML	Shallow	Y		Y		Y		Y	Y	Y		Keep for PFAS sampling	Yes	FM
YAM	CRA-837ML	Shallow	Y		Y		Y		Y	Y		Y	Abandon 2024	Yes	FM
YAM	CRA-970M	Shallow				Y	Y		Y			Y	Abandon 2024	Yes	FM
YAM	CRA-971M	Shallow				Y	Y		Y		Y		Keep for PFAS sampling	Yes	FM
YAM	CRA-972M	Shallow				Y	Y		Y		Y		Keep for PFAS sampling	Yes	FM
YAM	CRA-973M	Shallow				Y	Y		Y		Y		Keep for PFAS sampling	Yes	FM
YAM	CRA-974M	Shallow	Y		Y	Y	Y		Y	Y	Y	Y	Abandon 2024	Yes	FM
YAM	CRA-975M	Shallow					Y		Y		Y		Keep for PFAS sampling	Yes	FM
YAM	CRA-976M	Shallow				Y	Y		Y				Keep for PFAS sampling	Yes	FM
YAM	CRA-977M	Shallow				Y	Y		Y			Y	Abandon 2024	Yes	FM
YAM	CRA-978M	Shallow				Y	Y		Y		Y		Keep for PFAS sampling	Yes	FM
WCAA	CRA-979M	Shallow					Y		Y		Y		Keep for PFAS sampling	Yes	FM
WCAA	CRA-980M	Shallow			Y		Y		Y		Y		Keep for PFAS sampling	Yes	FM
WCAA	CRA-981M	Shallow					Y		Y		Y		Keep for PFAS sampling	Yes	FM
WCAA	CRA-982M	Shallow					Y		Y		Y		Keep for PFAS sampling	Yes	FM
WCAA	CRA-983M	Shallow					Y		Y		Y		Keep for PFAS sampling	Yes	FM
YAM	GHD-1004M	Shallow				Y	Y		Y		Y		Keep for PFAS sampling	Yes	FM
YAM	GHD-1005M	Shallow	Y		Y	Y	Y		Y	Y	Y		Keep for PFAS sampling	Yes	FM

Table 1

Proposed 2024 Well Abandonment Plan
Former Willow Run Powertrain Site
Ypsilanti, Michigan

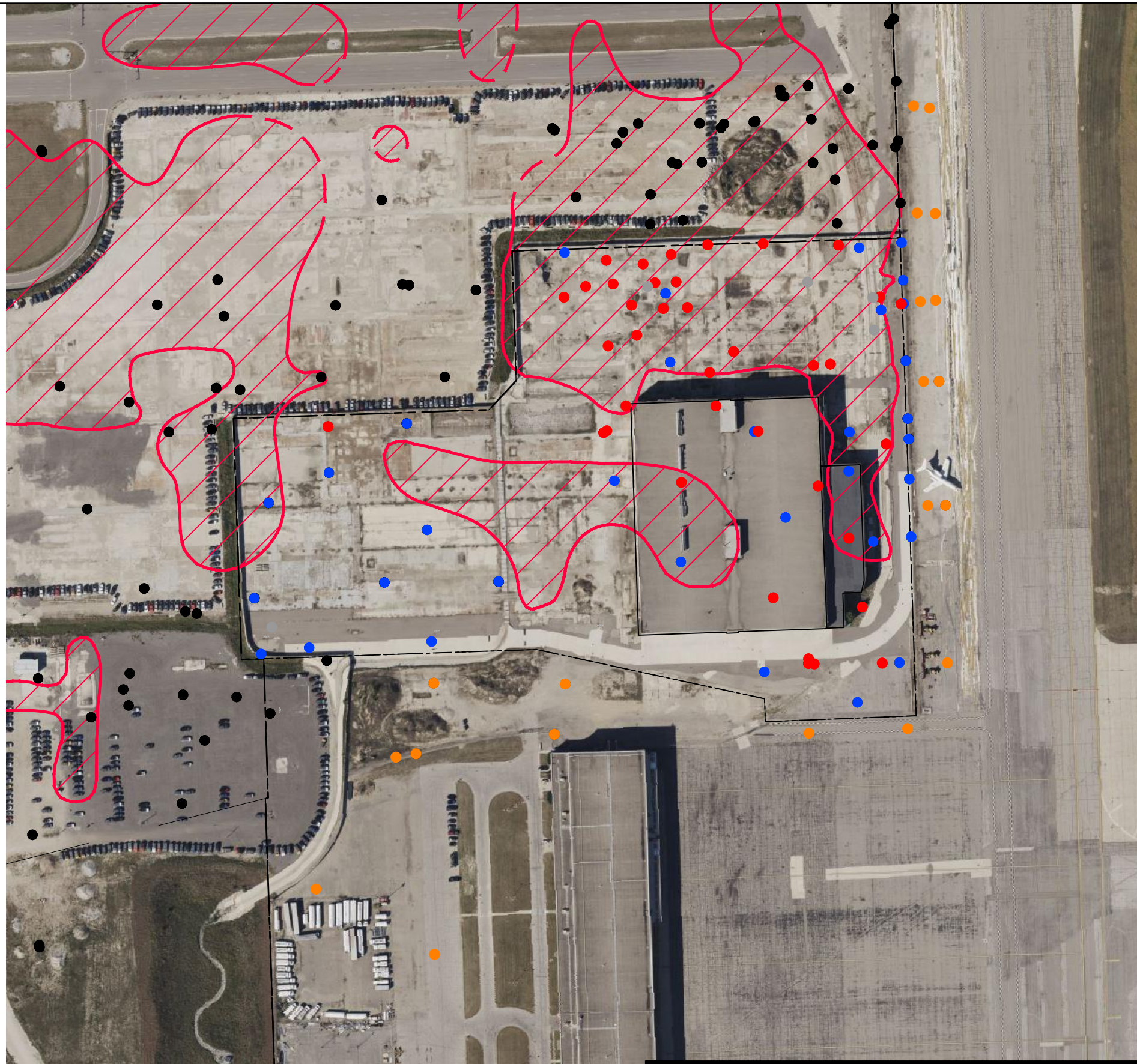
Property	Monitoring Location	Groundwater Zone	GW Quality - Perimeter (2021 - 2023) (VOCs, SVOCs, Metals)	GW Quality and Levels - PCE Area (VOCs)	LNAPL Stability	LNAPL - NSZDMI	GW Flow - French Drain	GW Flow / Elevation NW Infiltration Area	GW Flow - Sitewide	Annual Sampling List	Sampled for PFAS?	2024 Proposed Abandonment	Abandonment Notes / Rationale (No Specific Use + ...)	Stratigraphy & Instrumentation Log?	Well Type (SU,FM,Vault, A/B)
YAM	GHD-1006M	Shallow				Y	Y		Y		Y		Keep for PFAS sampling	Yes	FM
YAM	GHD-1009M	Shallow			Y	Y	Y		Y			Y	Abandon 2024	Yes	FM
YAM	GHD-1209M	Shallow		Y			Y		Y				Keep for PCE Area Evaluation	Yes	FM
YAM	GHD-1210M	Shallow			Y		Y		Y		Y		Keep for PCE Area Evaluation	Yes	FM
YAM	GHD-1211M	Shallow	Y		Y		Y		Y	Y	Y		Keep for PFAS sampling	Yes	FM
YAM	GHD-1212M	Shallow	Y		Y		Y		Y	Y		Y	Abandon 2024	Yes	FM
YAM	GHD-1213M	Shallow	Y		Y		Y		Y	Y		Y	Abandon 2024	Yes	FM
YAM	GHD-1214M	Shallow	Y		Y		Y		Y	Y	Y		Keep for PFAS sampling	Yes	FM
YAM	GHD-1229M	Shallow	Y	Y	Y		Y		Y	Y	Y		Keep for PCE Area Evaluation	Yes	FM
YAM	GHD-986M	Shallow				Y			Y		Y	Y	Abandon 2024	Yes	FM
YAM	GHD-999M	Shallow									Y		Keep for PFAS sampling	Yes	FM
WCAA	GHD-1235M	Shallow									Y		Keep for PFAS sampling	Yes	FM
WCAA	GHD-1236M	Shallow									Y		Keep for PFAS sampling	Yes	FM
WCAA	GHD-1237M	Shallow									Y		Keep for PFAS sampling	Yes	FM
WCAA	GHD-1238M	Shallow									Y		Keep for PFAS sampling	Yes	FM
WCAA	GHD-1239M	Shallow									Y		Keep for PFAS sampling	Yes	FM
WCAA	GHD-1240M	Shallow									Y		Keep for PFAS sampling	Yes	FM
WCAA	GHD-1241M	Shallow									Y		Keep for PFAS sampling	Yes	FM
WCAA	GHD-1242M	Shallow									Y		Keep for PFAS sampling	Yes	FM
WCAA	GHD-1243M	Shallow									Y		Keep for PFAS sampling	Yes	FM
WCAA	GHD-1244M	Shallow									Y		Keep for PFAS sampling	Yes	FM
WCAA	MW-103	Shallow									Y		Keep for PFAS sampling	No	SU
WCAA	MW-6	Shallow		Y			Y		Y		Y		Keep for PCE Area Evaluation	No	FM
WCAA	MW-9	Shallow		Y			Y		Y		Y		Keep for PCE Area Evaluation	No	FM
WCAA	WCAA-MW09-2017	Shallow									Y		Keep for PCE Area Evaluation	Yes	FM
WCAA	WCAA-MW14-2017	Shallow		Y							Y		Keep for PCE Area Evaluation	Yes	FM
YAM	CRA-315I	Intermediate							Y			Y	Abandon 2024	Yes	FM
YAM	CRA-972I	Intermediate							Y			Y	Abandon 2024	Yes	FM
YAM	CRA-041R	Shallow										Y	Abandon 2024	Yes	FM
YAM	CRA-113M	Shallow										Y	Abandon 2024	Yes	FM
YAM	CRA-122M-A	Shallow										Y	Abandon 2024	No	FM (A/B)
YAM	CRA-122M-B	Shallow										Y	Abandon 2024	No	FM (A/B)
YAM	CRA-125M	Shallow										Y	Abandon 2024	Yes	FM
YAM	CRA-128M	Shallow											Not Part of Network. Destroyed or Concreted Over/CNL. No Action.	Yes	FM
YAM	CRA-228M	Shallow										Y	Abandon 2024	No	FM
YAM	CRA-282M	Shallow										Y	Abandon 2024	No	FM
YAM	CRA-310M	Shallow		Y									Keep for PCE Area Evaluation	Yes	FM

Table 1

Proposed 2024 Well Abandonment Plan
Former Willow Run Powertrain Site
Ypsilanti, Michigan

Property	Monitoring Location	Groundwater Zone	GW Quality - Perimeter (2021 - 2023) (VOCs, SVOCs, Metals)	GW Quality and Levels - PCE Area (VOCs)	LNAPL Stability	LNAPL - NSZD/VI	GW Flow - French Drain	GW Flow / Elevation NW Infiltration Area	GW Flow - Sitewide	Annual Sampling List	Sampled for PFAS?	2024 Proposed Abandonment	Abandonment Notes / Rationale (No Specific Use + ...)	Stratigraphy & Instrumentation Log?	Well Type (SU,FM,Vault, A/B)
YAM	CRA-311M	Shallow										Y	Abandon 2024	Yes	FM
YAM	CRA-513R	Shallow										Y	Abandon 2024	Yes	FM
YAM	CRA-515R	Shallow										Y	Abandon 2024	Yes	FM
YAM	CRA-516R	Shallow										Y	Abandon 2024	Yes	FM
YAM	CRA-517R	Shallow										Y	Abandon 2024	Yes	FM
YAM	CRA-518R	Shallow										Y	Abandon 2024	Yes	FM
YAM	CRA-519R	Shallow										Y	Abandon 2024	Yes	FM
YAM	CRA-520R	Shallow										Y	Abandon 2024	Yes	FM
YAM	CRA-521R	Shallow										Y	Abandon 2024	Yes	FM
YAM	CRA-522R	Shallow										Y	Abandon 2024	Yes	FM
YAM	CRA-523R	Shallow										Y	Abandon 2024	Yes	FM
YAM	CRA-524R	Shallow										Y	Abandon 2024	Yes	Vault
YAM	CRA-757M	Shallow		Y									Keep for PCE Area Evaluation	Yes	FM
YAM	CRA-969M	Shallow											Keep for PFAS sampling	Yes	FM
YAM	GHD-996M	Shallow										Y	Abandon 2024	Yes	FM
YAM	GHD-997M	Shallow											Keep for PFAS sampling	Yes	FM
YAM	GHD-998M	Shallow										Y	Abandon 2024	Yes	FM
YAM	CRA-785I	Intermediate										Y	Abandon 2024	Yes	FM
ACM	CRA-704D	Deep										Y	Abandon 2024	Yes	FM
ACM	CRA-726D	Deep										Y	Abandon 2024	Yes	FM
ACM	CRA-742D	Deep											Destroyed	Yes	N/A
YAM	CRA-785D	Deep										Y	Abandon 2024	Yes	FM
YAM	CRA-263M	Unk (S assumed)											Not Part of Network. Destroyed (assumed)/CNL. No Action.	No	FM
YAM	CRA-273M	Unk (S assumed)											Destroyed	No	FM
YAM	CRA-032R	Unk (I assumed)											Not Part of Network: Destroyed / CNL (buried, in vault). No Action.	No	Vault
YAM	CRA-033R	Unk (I assumed)											Not Part of Network: Destroyed / CNL (buried, in vault). No Action.	No	Vault

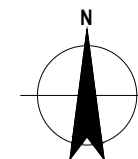
Notes:
GW: Groundwater
LNAPL: Light Non-Aqueous Phase Liquid
NSZD/VI: Natural Source Zone Depletion / Vapor Intrusion
SU: stick-up style protective casing (top of well is above ground)
FM: flush mount style protective casing (top of well is below ground)
temp EXT: temporary extension (will be converted to a FM in future)



- LEGEND**
- PROPERTY BOUNDARY
 - APPROXIMATE EXTENTS OF LNAPL
 - EXISTING MONITORING WELL LOCATION ON YAM PROPERTY
 - NON-EXISTING/DAMAGED MONITORING WELL LOCATION
 - EXISTING MONITORING WELL ON ACM PROPERTY
 - EXISTING MONITORING WELL LOCATION ON WCAA PROPERTY
 - 2024 PROPOSED FOR ABANDONMENT

0 100 200 ft
1" = 200 ft

Coordinate System:
MICHIGAN SOUTH
INTERNATIONAL FEET NAD83

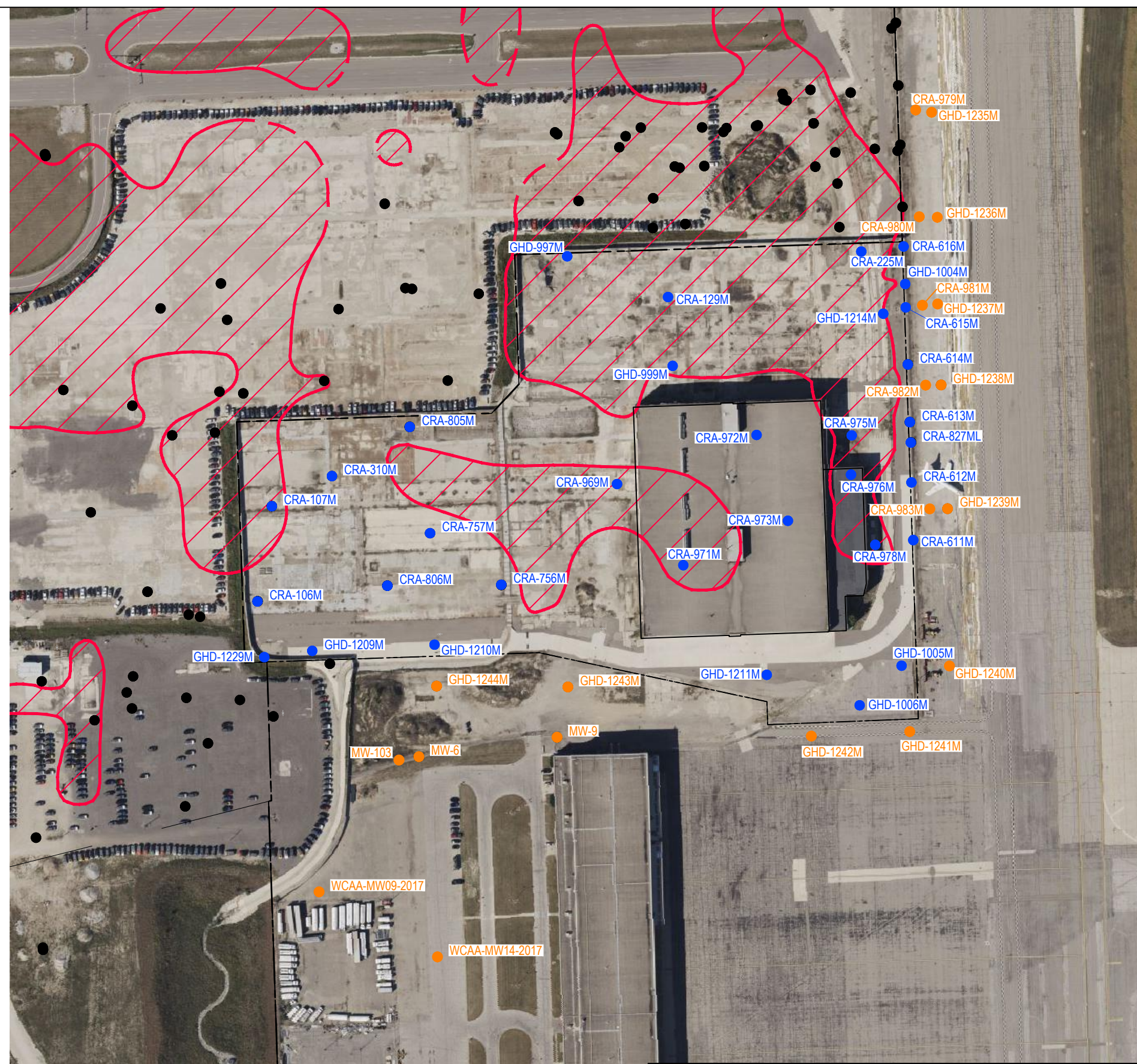


FORMER WILLOW RUN POWERTRAIN SITE
YPSILANTI, MICHIGAN

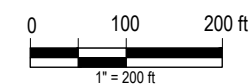
2024 PROPOSED MONITORING WELL
ABANDONMENT ON YAM PROPERTY

Project No. 12602792
Date July 2024

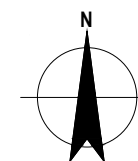
FIGURE 1



LEGEND



Coordinate System:
MICHIGAN SOUTH
INTERNATIONAL FEET NAD83

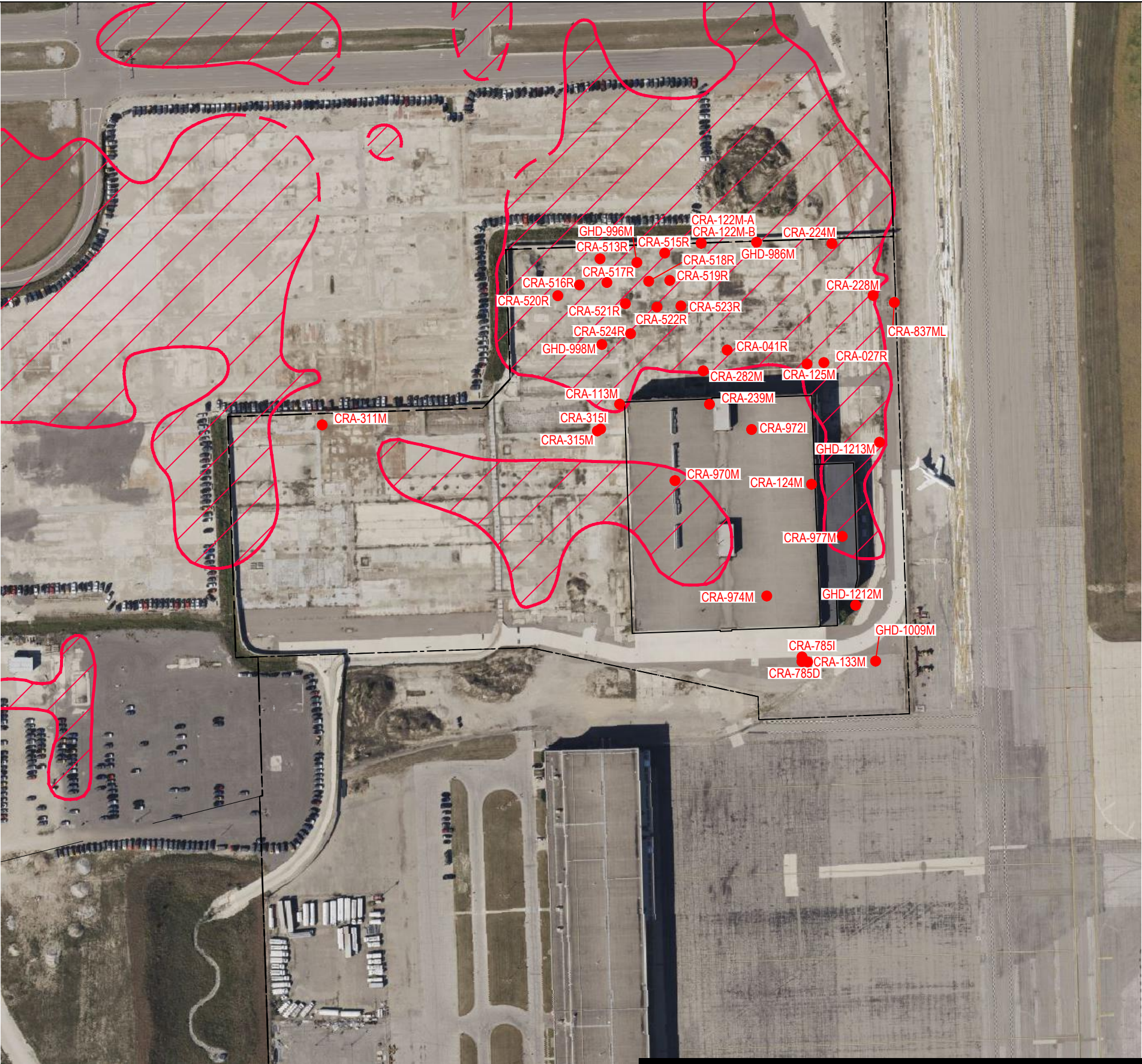


FORMER WILLOW RUN POWERTRAIN SITE
YPSILANTI, MICHIGAN

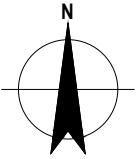
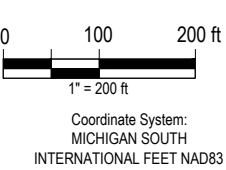
**2024 PROPOSED MONITORING WELLS
TO KEEP ON YAM PROPERTY**

Project No. 12602792
Date July 2024

FIGURE 1A



LEGEND
----- PROPERTY BOUNDARY
APPROXIMATE EXTENTS OF LNAPL
● 2024 PROPOSED FOR ABANDONMENT

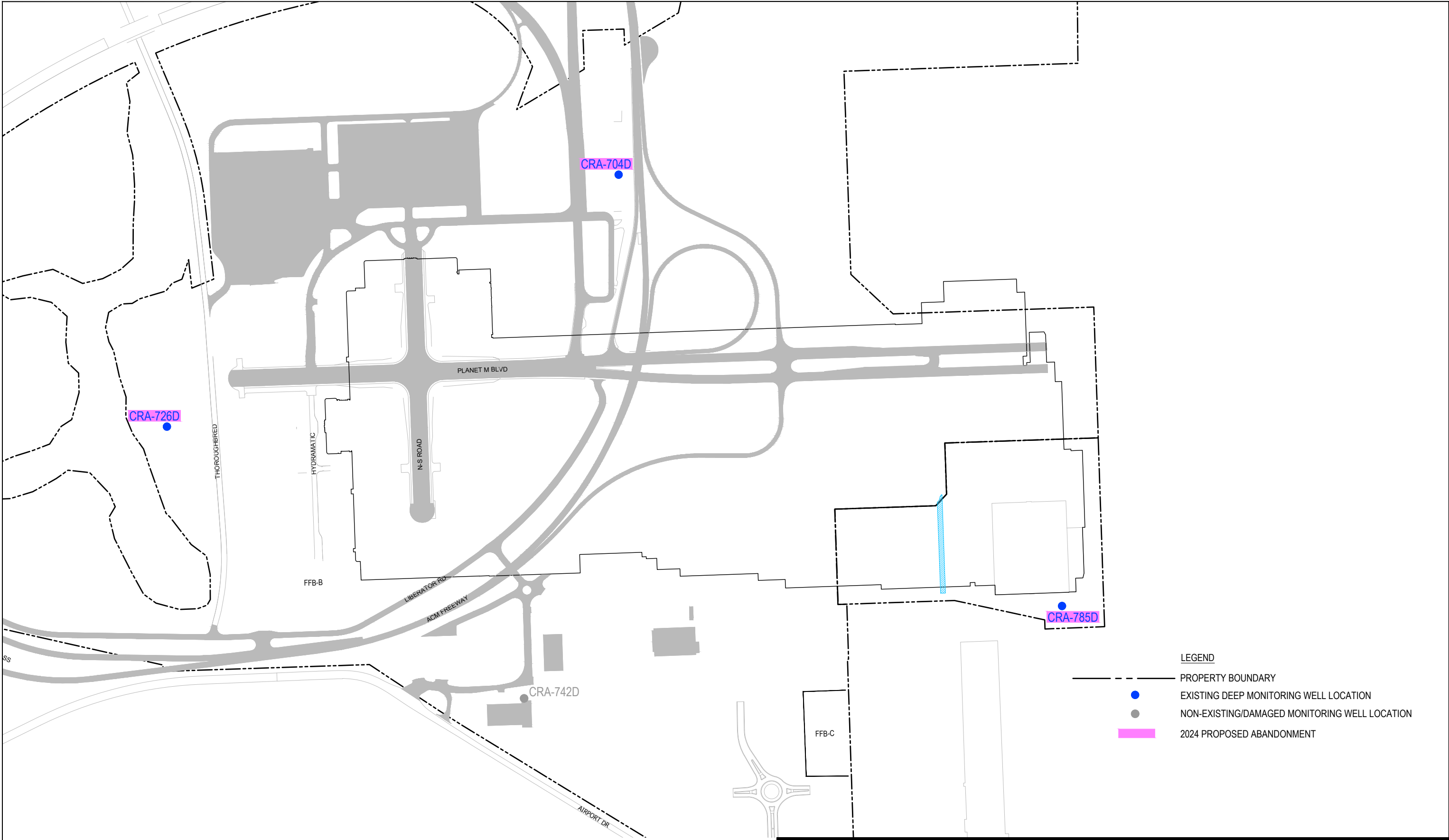


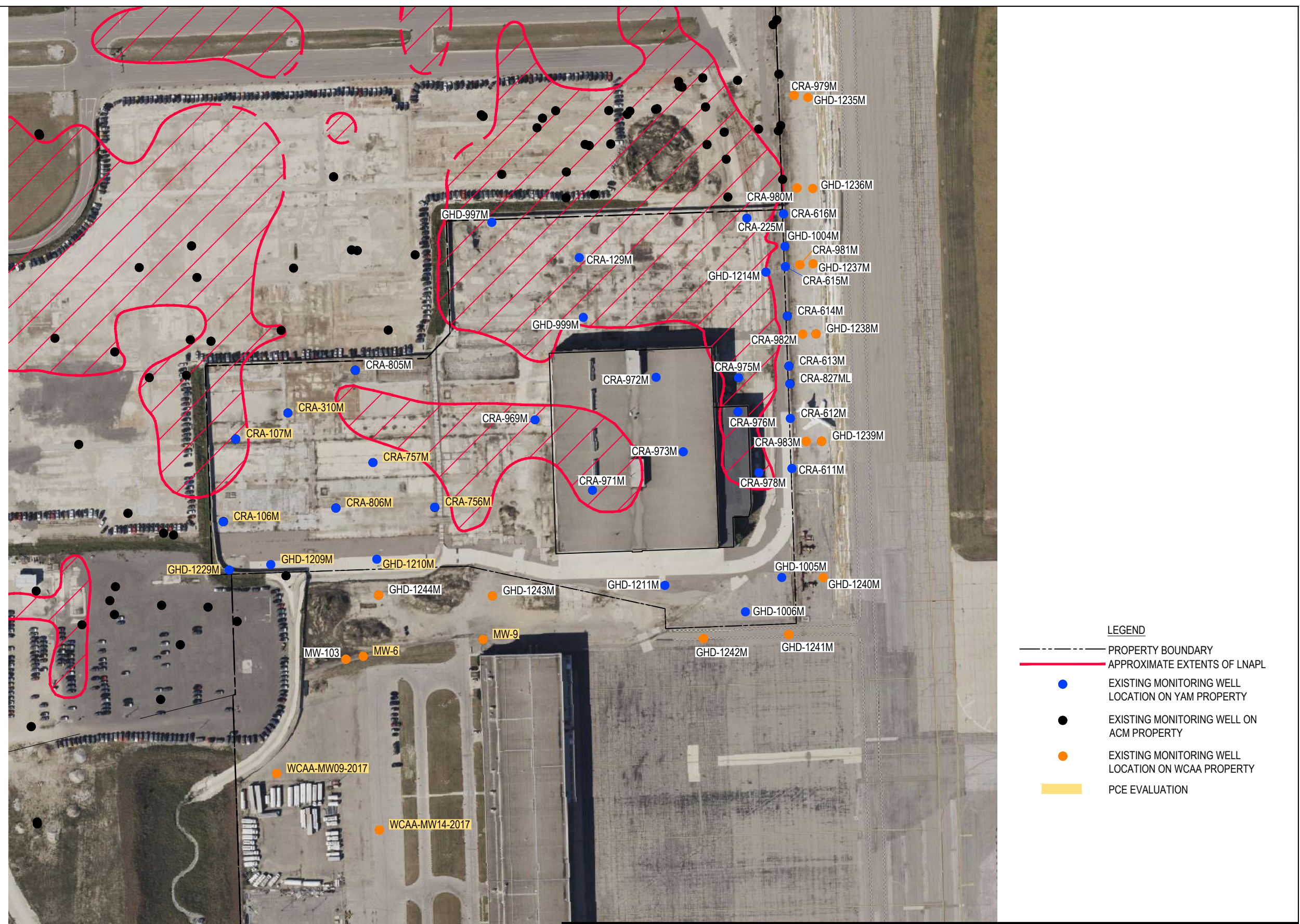
FORMER WILLOW RUN POWERTRAIN SITE
YPSILANTI, MICHIGAN

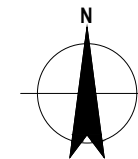
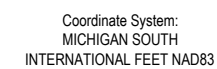
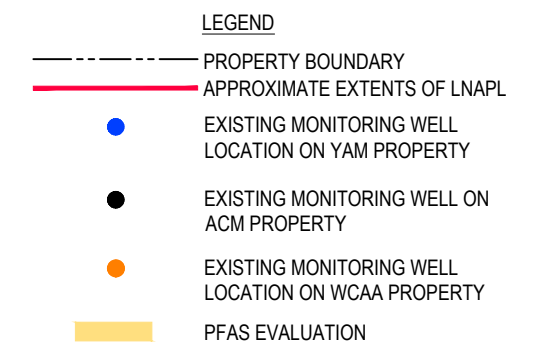
2024 PROPOSED MONITORING WELL
ABANDONMENT ON YAM PROPERTY

Project No. 12602792
Date July 2024

FIGURE 1B







FORMER WILLOW RUN POWERTRAIN SITE
YPSILANTI, MICHIGAN

PROPOSED MONITORING WELLS TO KEEP FOR PFAS EVALUATION

Project No. 12602792
Date July 2024

FIGURE 4