



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING



C. HEIDI GREYHER
DIRECTOR

September 17, 2018

Mr. Dave Favero
RACER Trust
500 Woodward Avenue, Suite 2650
Detroit, Michigan 48226

Dear Mr. Favero:

SUBJECT: Acceptance of *Supplemental Resource Conservation and Recovery Act Facility Investigation (RFI) Groundwater Monitoring, Deep Groundwater Aluminum Sampling Report*, RACER Former Peregrine, Inc., Coldwater Road Facility, Genesee Township, Michigan; MIR 000 020 743

The staff of the Michigan Department of Environmental Quality (MDEQ), Waste Management and Radiological Protection Division (WMRPD), has received and reviewed the May 4, 2018, *Supplemental RFI Groundwater Monitoring Deep Groundwater Aluminum Sampling Report* (Report) for the RACER Former Peregrine, Inc., Coldwater Road facility (RACER) prepared by GHD Limited. The Report and the additional information provided on July 3, 2018, and September 6, 2018, were 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 (Plan), which was approved by the MDEQ on October 15, 2013.

Based on our review, the WMRPD is in general agreement with the conclusion and recommendations in the Report. We agree that sampling results have shown that aluminum is not above residential health-based drinking water criteria in the deep groundwater. Based on these results, further sampling for aluminum is not required. We agree that the results in the Report are a supplement to the 2010 RFI.

The WMRPD is not in agreement with the recommendation to properly abandon all deep on-site monitoring wells. Further correspondence between RACER and WMRPD determined that all the remaining wells (deep or shallow) would not be abandoned, until authorized by the WMRPD.

The WMRPD agrees with the recommendation to prepare and submit, to the WMRPD, a RCRA Corrective Action Complete with Controls request for the property.

Should you require further information, please contact me 517-284-6558; confortir@michigan.gov; or MDEQ, WMRPD, P.O. Box 30241, Lansing, Michigan 48909-7741.

Sincerely,



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

cc: Mr. Grant Trigger, RACER Trust
Mr. Mike Tomka, GHD Limited
Mr. Allan Taylor, MDEQ
Mr. Joseph Rogers, MDEQ
Mr. Bryan Grochowski, MDEQ
Mr. John McCabe, MDEQ
Corrective Action File