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January 22, 1998

Reference No. 4770

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Gentlemen:

Re: Revisions to Proposed Removal Action  
Textile Road Site, Washtenaw County, Michigan

EPA Region 5 Records Ctr.



237189

As you are aware, the Textile Road Site Cooperating Parties Group (Group) has been in discussion with officials from the Charter Township of Ypsilanti (Township) regarding the proposed Removal Action (RA) at the Textile Road Site (Site) located in Washtenaw County, Michigan. The basis for these discussions has been the Removal Action Work Plan (Work Plan) prepared by Conestoga-Rovers & Associates (CRA) and submitted to the United States Environmental Protection Agency (U.S. EPA) on behalf of the Group on July 21, 1997 and the Proposed Plan issued by the U.S. EPA on July 30, 1997 (Proposed Plan).

The purpose of this letter is to summarize proposed amendments to the Work Plan and the Proposed Plan. These suggested amendments have been agreed to by the Group and the Township. The suggested amendments are intended to optimize the redevelopment potential of the property following the RA. This letter is presented in the following Sections:

- Section 1.0 Introduction
- Section 2.0 Proposed Amendments to Removal Action Work Plan
- Section 3.0 Basis for Amendments to Removal Action Work Plan

**1.0 INTRODUCTION**

Following submittal of the Work Plan to the U.S. EPA, and during the public comment period for the Proposed Plan, the Township raised the issue of the interplay between the property zoning and the cleanup standards proposed. The Work Plan and Proposed Plan were both developed based on the Ypsilanti Township Future Land Use Plan which indicated that the future land use of the

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Site was light industrial. The current zoning of the property indicates that the north portion of the Site (430 feet along Bunton Road) is zoned B-1: Local Business, this represents approximately 10 acres of the property. The remaining approximately 51 acres of the property is zone R-4: One Family Residential. The current Site zoning is illustrated on Figure 1. The Proposed Plan used Michigan Act 451, Part 201 industrial cleanup criteria because light industrial or commercial use was viewed as the most reasonable and foreseeable future land use for the property. However, the Township suggested that further consideration be given to the potential for redevelopment of at least part of the property for residential purpose. As a result of discussions between the Group and the Township, the Group is now suggesting changes to the RA. The Township supports these changes to the RA which are described in Section 2.0.

## **2.0 PROPOSED AMENDMENTS TO REMOVAL ACTION WORK PLAN**

All elements of the RA, as outlined in the Work Plan submitted July 21, 1997, will remain as components of the RA. These basic elements, as outlined in the Work Plan, are summarized as follows:

- construction of required support facilities and temporary controls;
- clearing and grubbing of required areas;
- Site security;
- environmental controls;
- Site-specific health and safety and contingency and emergency response planning;
- perimeter air monitoring;
- on-Site wastewater management;
- excavation of contaminated material to Michigan Act 451, Part 201 Generic Industrial Soil Direct Contact Value for PCBs of 21.0 mg/kg;

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- transportation and disposal of material contaminated with PCBs in concentrations between 21.0 mg/kg and 50.0 mg/kg at a Michigan Type II (Act 451, Part 115) landfill;
- transportation and disposal of material contaminated with PCBs in concentrations greater than 50.0 mg/kg at a permitted TSCA facility (EQ's TSCA Landfill);
- verification sampling to ensure cleanup goals have been achieved;
- backfilling of excavations and final grading of the Site with material from on-Site borrow area; and
- progress and final reporting.

The suggested amendments to the RA Work Plan are intended to optimize the redevelopment potential of the Site. The suggested amendments include additional excavation and consolidation of soils with PCB concentrations between 2.3 mg/kg (unlimited residential) and 21.0 mg/kg (unlimited industrial). Specifically, the suggested amendments include the following components:

- Material south of the portion of the Site zoned local business which is contaminated with PCBs above the Michigan Act 451, Part 201 Generic Residential Soil Direct Contact Value of 2.3 mg/kg will be excavated;
- Additional material located in the northwest corner of the Site which is contaminated with PCBs above the Michigan Act 451, Part 201 Generic Residential Soil Direct Contact Value of 2.3 mg/kg will be excavated;
- Excavated material containing PCB concentrations between 2.3 mg/kg and 21.0 mg/kg will be consolidated to the area north of Pond 1 (see Figure 2). This material will be used as backfill in place of "clean" on-Site borrow material as proposed in the RA Work Plan, as applicable;

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- Areas of Site in the residential portion and northwest corner where the above excavations occur will be backfilled with "clean" on-Site borrow area material; and
- Areas of the Site which continue to contain material contaminated with PCBs between 2.3 mg/kg and 21.0 mg/kg (the consolidation area) will be covered/capped with "clean" on-Site material, six inches of topsoil, and a vegetative cover, or other capping system (eg. commercial building and/or parking lot) which supports future development of the property and is approved by the U.S. EPA.

The additional excavation, consolidation, and capping areas discussed above are illustrated on Figure 2. The contours presented on Figure 2 were developed based on the PCB isoconcentration contours from 2-4 feet below ground surface (bgs) and 6-8 feet bgs and represent the estimated maximum lateral extent of contamination at the Site.

### **3.0 BASIS FOR AMENDMENTS TO REMOVAL ACTION WORK PLAN**

The intent of the suggested amendments to the proposed RA Work Plan is to achieve the maximum area of property suitable for all development options. The result of the suggested amendments would be to achieve approximately 51 acres of "unrestricted residential" property and 10 acres of "unrestricted industrial" property. The consolidation of contaminated material permits a more flexible redevelopment of the property.

We suggest that the U.S. EPA incorporate the suggested amendments into the Proposed Plan for the Site. In order to implement the amendments, revisions to the Work Plan and project specifications are required. CRA is prepared to quickly revise these documents. With your consent, CRA will reissue the revised version promptly.

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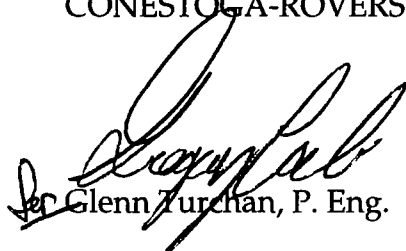
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Should you have any questions, or require additional information, please contact the undersigned.

Yours truly,

CONESTOGA-ROVERS & ASSOCIATES



per Glenn Turchan, P. Eng.

GC/gc/3  
Encl.

c.c.: David Novello (HS)  
Harvey Maness (HS)  
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