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Jeremy Pepin, Engineer
Michigan Department of Environment, Great Lakes, and Energy
Corrective Action Unit
Hazardous Waste Section
Materials Management Division
Constitution Hall
525 West Allegan Street
PO Box 30242
Lansing, Michigan 48909-7742

**Response to Comments in the CAMM Inspection Report
RACER Trust Bay City Powertrain Industrial Land; MID 005 356 688;
Waste Data System Number 393420**

Dear Mr. Pepin

GHD has prepared this letter on behalf of the Revitalizing Auto Communities Environmental Response Trust (RACER) for the Bay City Powertrain Industrial Land (Site or Facility) located in Bay City, Michigan. On October 30, 2023, the Michigan Department of Environment, Great Lakes, and Energy (EGLE) conducted a Corrective Action Monitoring and Maintenance (CAMM) inspection of the Site. The purpose of the CAMM inspection was to confirm that the Facility was in compliance with the long-term monitoring and maintenance requirements specified in the Department of Environmental Quality (now EGLE) approved Operation, Maintenance, and Monitoring Plan (O&M Plan) dated September 23, 2016, under Part 111, Hazardous Waste Management, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended, and the administrative rules promulgated thereunder. EGLE prepared and submitted a CAMM Inspection Report (Report) dated April 9, 2024, which included a list of action items that need to be addressed to maintain compliance with the long-term monitoring and maintenance requirements specified in the EGLE approved O&M Plan. This letter presents RACER's responses to the comments identified in the Report.

EGLE General Comments:

1. *Repair of the damaged/compromised spots in the perimeter fence.*

Response:

This work will be completed by Job Site Services, Inc (JSS) under the supervision of GHD. JSS will repair damaged/compromised spots in the perimeter fence in the following areas:

- On the east side where there is some fill missing below the fence.
- On the west side where there is a gap in the fence which we believe was utilized to facilitate the installation of the new outfall.

The east side fence repair and the west side fence repair will be completed following the completion of the swale work by approximately mid-July depending on any unexpected circumstances and/or weather conditions.

2. Completion of sewer separation and subsequent repair of the impacted areas of the vegetated cover and concrete cap.

Response:

This work will be completed by JSS under the supervision of GHD.

The sewer separation work is expected to be substantially complete by approximately mid-July depending on any unexpected circumstances and/or weather conditions. Seeding the impacted areas of the cover may need to be delayed until September 2024 when weather conditions will be better for establishing a vegetative cover.

The concrete driveway repair (i.e., filling cracks and sealing concrete) to prolong the life of the concrete driveway, which is acting as a direct contact barrier, can be started after the swale work associated with the storm water modifications is completed. The swale work is expected to be completed by approximately mid-July depending on any unexpected circumstances and/or weather conditions. However, an amendment to the approved 2024 annual budget will be needed for the concrete effort. It is expected that the budget amendment can be prepared and submitted to EGLE, and EGLE can complete review of a draft budget amendment request and approve/sign the budget by July 31, which may require the concrete work to be completed by the end of September depending upon contractor availability, any unexpected circumstances, and/or weather conditions.

The Construction Completion Report for the storm water modifications will be completed by GHD and submitted in Q4-2024.

3. Installation of permanent markers as specified in the O&M Plan.

Response:

GHD will obtain the markers and will plan to install them within six months of recording of the Declaration of Restrictive Covenant (DRC) (see Item 4). The main permanent marker references the recordation of the DRC and will take an estimated two to four months to produce after the DRC information is available.

4. As discussed in Section 3.1.2 of the Report, modification of the restrictive covenant to provide consent of the easement holder, Consumers Power, and to provide the Soil Vapor Management language.

Response:

RACER has identified the following easements:

- a. An easement benefitting Consumers Power Co. (now Consumers Energy), for various electrical features (poles, transformers, cross arms, wires, cables, anchors, guys, fixtures, and appurtenances thereto) allowing construction "over and across" an area that runs east to west and installed no more than 5' from the property's southern boundary. This was recorded in Bay County on 1/17/1936.
- b. A 12'-wide easement benefitting Consumers Power Co. for various electrical features (poles, transformers, cross arms, wires, cables, anchors, guys, fixtures, and appurtenances thereto) allowing construction "over and across" RACER property from northeast to southwest. This was recorded in Bay County on 3/10/1961 and an amendment to it was recorded on 3/11/1966. RACER has not been able to locate this second easement accurately on a property boundary map.

RACER will work with Consumers to obtain their consent of the updated DRC. It is noted that RACER has no control over the timing of Consumers review of a draft DRC. The updated DRC will contain the requested Soil Vapor Management provision as well as other as-built information from the storm water modification work similar to the format used in the existing recorded DRC. RACER will work to submit a draft DRC that has Consumers' approval to EGLE for review as timely as possible but cannot guarantee a delivery date due to potential third-party review issues.

5. Repair of the two monitoring wells in the northern corner of the facility where casing heaving were noted.

Response:

GHD conducted an additional inspection of the monitoring wells on April 15, 2024, and identified five monitoring wells (MW2-00, MW101S, LMW13S, LMW14S, and LMW15D) that require repair. JSS will repair these five monitoring wells under the supervision of GHD. However, an amendment to the approved 2024 annual budget will be needed for well repair effort, which may push back the completion date. It is expected that the budget amendment can be prepared and submitted to EGLE, and EGLE can EGLE can complete review of a draft budget amendment request and approve/sign the budget by July 31, which may require the well repair to be completed by the end of September depending upon contractor availability, any unexpected circumstances, and/or weather conditions.

6. Due to activities at the former facility that this facility was parceled from, further investigation into the potential presence of per- and polyfluoroalkyl substances (PFAS), in groundwater is required. A sample must be taken from the influent of the groundwater treatment system and analyzed for the currently EGLE recommended list of 34 PFAS. Additional information regarding the recommended list of PFAS, analytical methods, etc., is attached to this Report.

Response:

General Motors LLC (GM) maintains the active part of the larger facility (prior to bankruptcy) and previously investigated for PFAS at the main plant. According to GM's 2019 PFAS sampling report, PFAS were detected at low ppt levels and only one exceedance of the GSI criteria was detected. Therefore, GHD does not believe further investigation is necessary based on the former operations at this property. Given the current concerns regarding remaining available funding for environmental action at RACER's Michigan sites and consistent with three other RACER sites where U.S. EPA believes sampling for PFAS is necessary, RACER will provide for access to the influent of the groundwater treatment system if EGLE would like to collect a sample and analyze the sample for PFAS at its cost.

A summary of the target completion and submittal dates is as follows:

Item #	Task	Target Completion / Submittal Date
1a	Fence repair, east side	July 19, 2024
1b	Fence repair, west side	July 19, 2024
2a	Sewer separation ¹	July 19, 2024
2b	Concrete repair ²	September 27, 2024
2c	Construction Completion Report	December 20, 2024
3	Permanent Markers	6 months after DRC recorded
4	Record DRC	Subject to preparation time, Consumers' review, and EGLE's review
5	Monitoring well repair (5 locations) ²	September 27, 2024

- 1 - Seeding for establishing a vegetative cover may be delayed until September 204 for better weather conditions.
- 2 - Task completion dependent upon when EGLE approves an amendment to the 2024 annual budget.

Regards



John-Eric Pardys
Engineering Leader

+1 519 340-4316
john-eric.pardys@ghd.com

JG/we/21

Copy to: Melissa Yuvan, EGLE
Amanda Armbruster, EGLE
Jim Ferritto, EGLE
Dale Bridgford, EGLE
Trisha Confer, EGLE
Joe Rogers, EGLE
Ethan Isreals, EGLE
Corrective Action File

Grant Trigger, RACER
Brendan Mullen, RACER
David Favero, RACER
Michael Tomka, GHD