



**CONESTOGA-ROVERS
& ASSOCIATES**

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November 11, 2011

Reference No. 012636

Mr. Richard A. Conforti, Jr., P.E.
Hazardous Waste Section, Resource Management Division
Michigan Department of Environmental Quality
525 W. Allegan Street(Constitution Hall)
Lansing, Michigan
U.S.A. 48933

Dear Mr. Conforti:

Re: Response to MDEQ Comments Dated September 26, 2011
Former Peregrine Coldwater Road Facility, Genesee Township, Michigan

On behalf of Revitalizing Automotive Community Environmental Response Trust (RACER), the following presents responses to the Michigan Department of Environmental Quality (MDEQ) comments received in a letter dated September 26, 2011 regarding the responses to Conestoga-Rovers & Associates July 27, 2011 Letter on the Former Peregrine (US), Inc. (Peregrine), Coldwater Road Facility, Genesee Township, Michigan [MID 000 020 743](Site).

For ease of review, the original comment is presented in *italics*, followed by a response.

DEQ Comment #1

The DEQ is in general agreement with the approach regarding the proposed background groundwater concentration study; however, as discussed during the September 14 meeting, DEQ approval of the background concentrations will not be provided until we have review the final calculations. In addition, background concentrations must be calculated using total metal concentrations unless justification can be provided that the total metals concentration is unrepresentative of actual metals concentrations in groundwater due to high turbidity and suspended solids introduced during the sampling process and that dissolved metals are more representative of actual metals concentration.

Response

Following completion of the proposed background sampling, we will complete the background groundwater concentration study including calculations and submit for your review and



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comment. We anticipate having all the necessary data following the Q1 2012 sampling event. We expect to submit the draft background concentration study in May/June 2012.

DEQ Comment #2

As discussed during the September 14 meeting, the DEQ would like additional monitoring wells installed at the perimeter of the facility in order to more fully investigate the potential for off-site migration of contaminated shallow groundwater. The one monitoring location proposed by CRA is not adequate to fully investigate the issue and document that no off-site migration is occurring. Therefore, the facility must provide additional information regarding how additional monitoring locations will be selected and monitored. As also discussed during the meeting, it is expected that the additional locations will be selected based on the location of preferential pathways/utility corridors, the presence of shallow groundwater, and the potential connection of those pathways to areas of known present and/or former soil and groundwater contamination.

Response

As discussed during our September 14 meeting, we have attached the following for your consideration:

1. Figure 1 presents a summary of the shallow groundwater data.
2. Figure 2 presents the preferential pathway/utility corridor locations expected to be in the shallow groundwater where shallow groundwater samples will be collected using a Geoprobe.
3. Figure 3 presents proposed perimeter locations to evaluate off-Site migration. Groundwater samples will be collected from the proposed locations using a Geoprobe.

Geoprobe groundwater samples will be analyzed for nine metals (total and dissolved: aluminum, arsenic, barium, chromium, iron, lead, manganese, selenium, and vanadium) which previously exceeded criteria and VOCs. The proposed sampling will be completed in conjunction with the Q1 2012 sampling event. The sample results will be screened using the results from the background groundwater concentration study (anticipated to be in July or August 2012). In the event that exceedances are found as a result of the Geoprobe analysis, additional monitoring well may be proposed.



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Should you have any questions on the above, please do not hesitate to contact the undersigned.

Yours truly,

CONESTOGA-ROVERS & ASSOCIATES

Michael R. Tomka, P.E.

RC/ev/10

Encl.

cc: David Favero/Grant Trigger, RACER Trust
Jack Schinderle/John McCabe/Joe Rogers, MDEQ
William Yocum, MDEQ

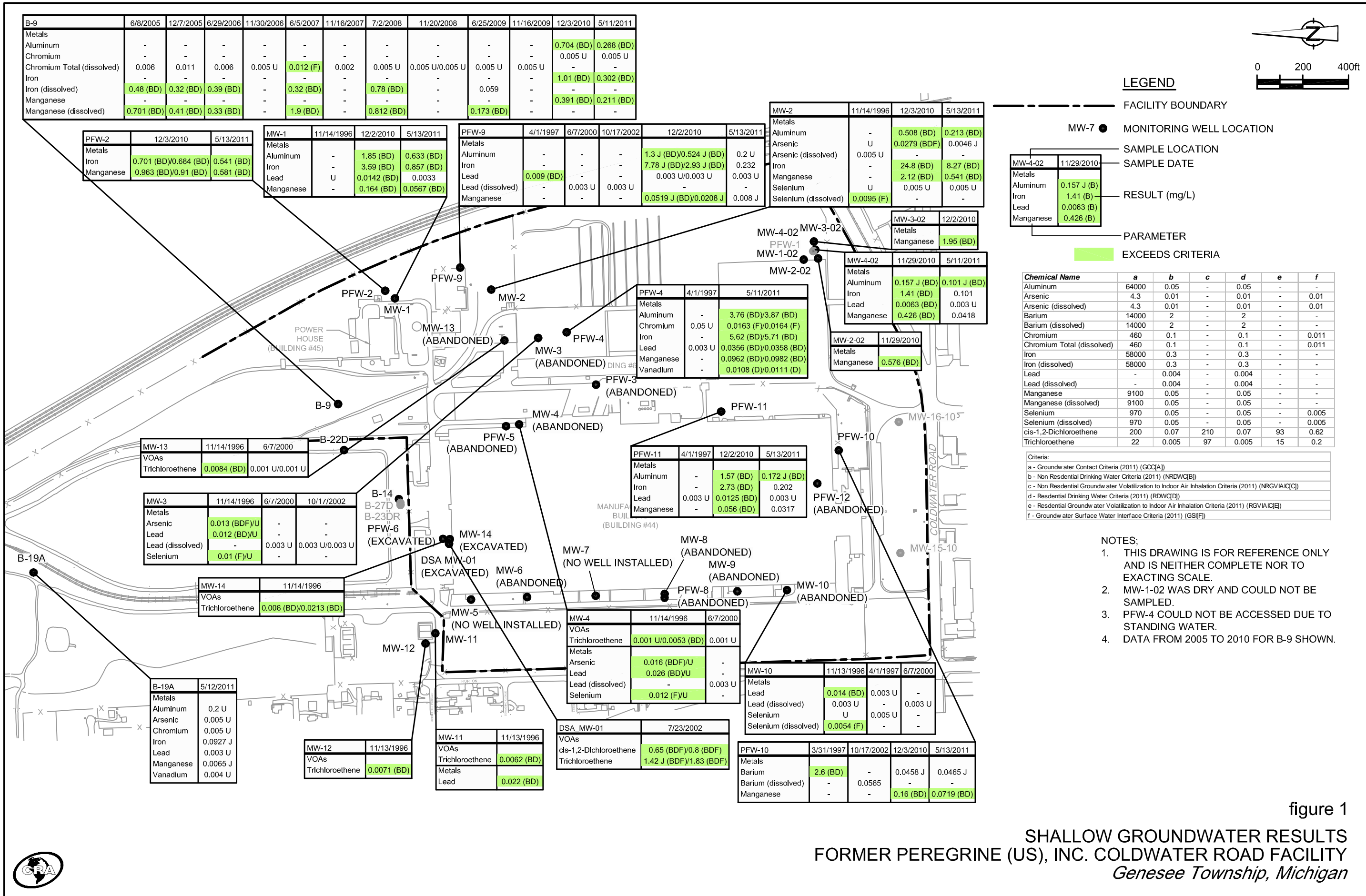
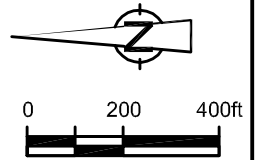


figure 1
SHALLOW GROUNDWATER RESULTS
FORMER PEREGRINE (US), INC. COLDWATER ROAD FACILITY
Genesee Township, Michigan

LEGEND

- FACILITY BOUNDARY
- MW-7 ● BACKGROUND MONITORING WELL LOCATION TO BE SAMPLED
- MW-1 ○ INVESTIGATIVE MONITORING WELL LOCATION
- MW-11 ● MONITORING WELL LOCATION/
FORMER MONITORING WELL LOCATION
NOT TO BE SAMPLED
- STM --- STORM SEWER LINE
- SAN --- SANITARY SEWER LINE
- ⊙ PROPOSED GEOPROBE LOCATION



NOTE:
THIS DRAWING IS FOR REFERENCE ONLY AND
IS NEITHER COMPLETE NOR TO EXACTING
SCALE.

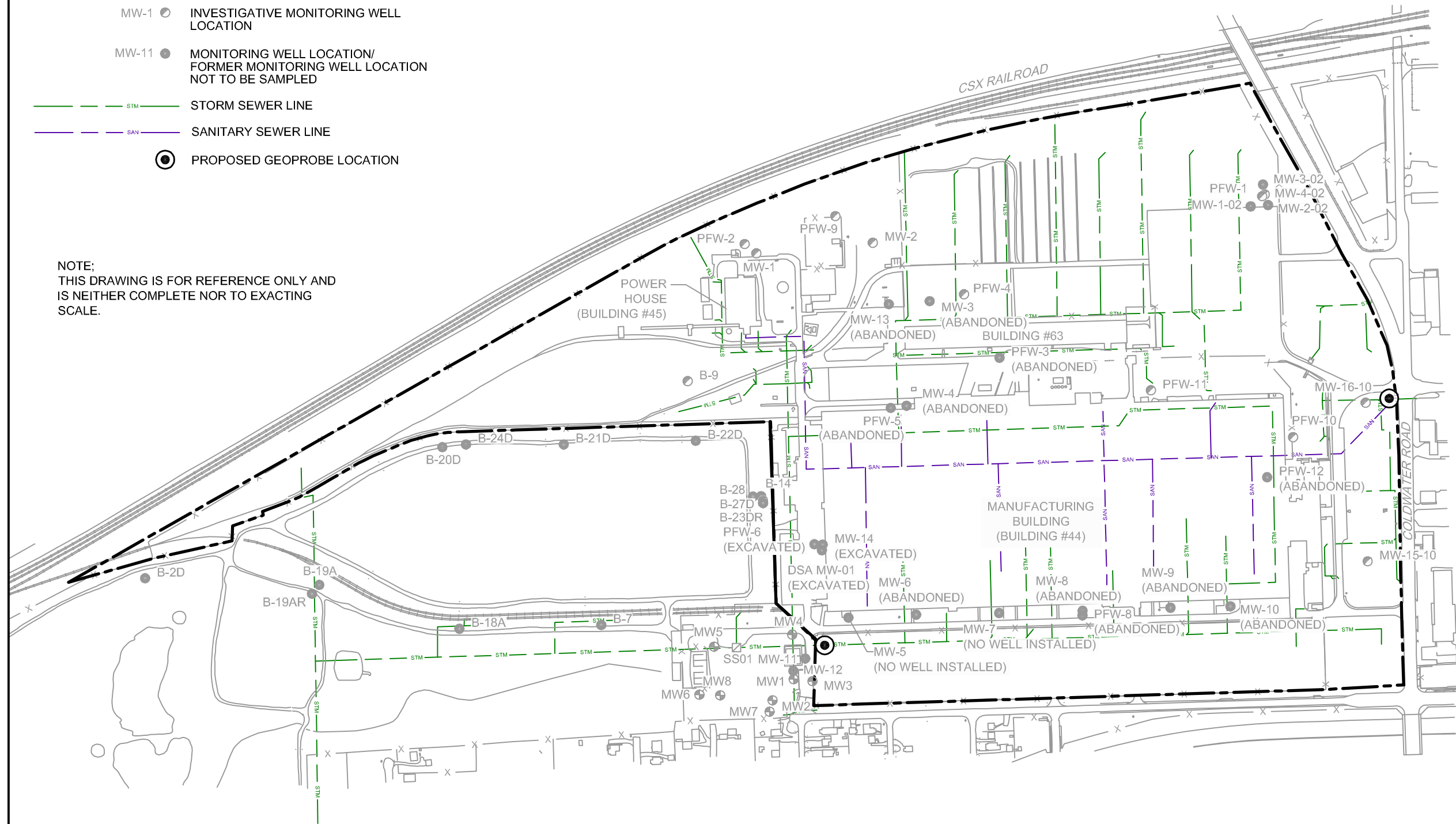


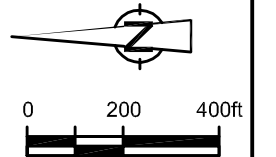
figure 2

2012 PREFERENTIAL PATHWAY / UTILITY CORRIDOR INVESTIGATION LOCATIONS
FORMER PEREGRINE (US), INC. COLDWATER ROAD FACILITY
Genesee Township, Michigan



LEGEND

- FACILITY BOUNDARY
- MW-7 ● BACKGROUND MONITORING WELL LOCATION TO BE SAMPLED
- MW-1 ○ INVESTIGATIVE MONITORING WELL LOCATION
- MW-11 ● MONITORING WELL LOCATION/
FORMER MONITORING WELL LOCATION
NOT TO BE SAMPLED
- STM --- STORM SEWER LINE
- SAN --- SANITARY SEWER LINE
- SHALLOW WELL
- PROPOSED GEOPROBE LOCATION



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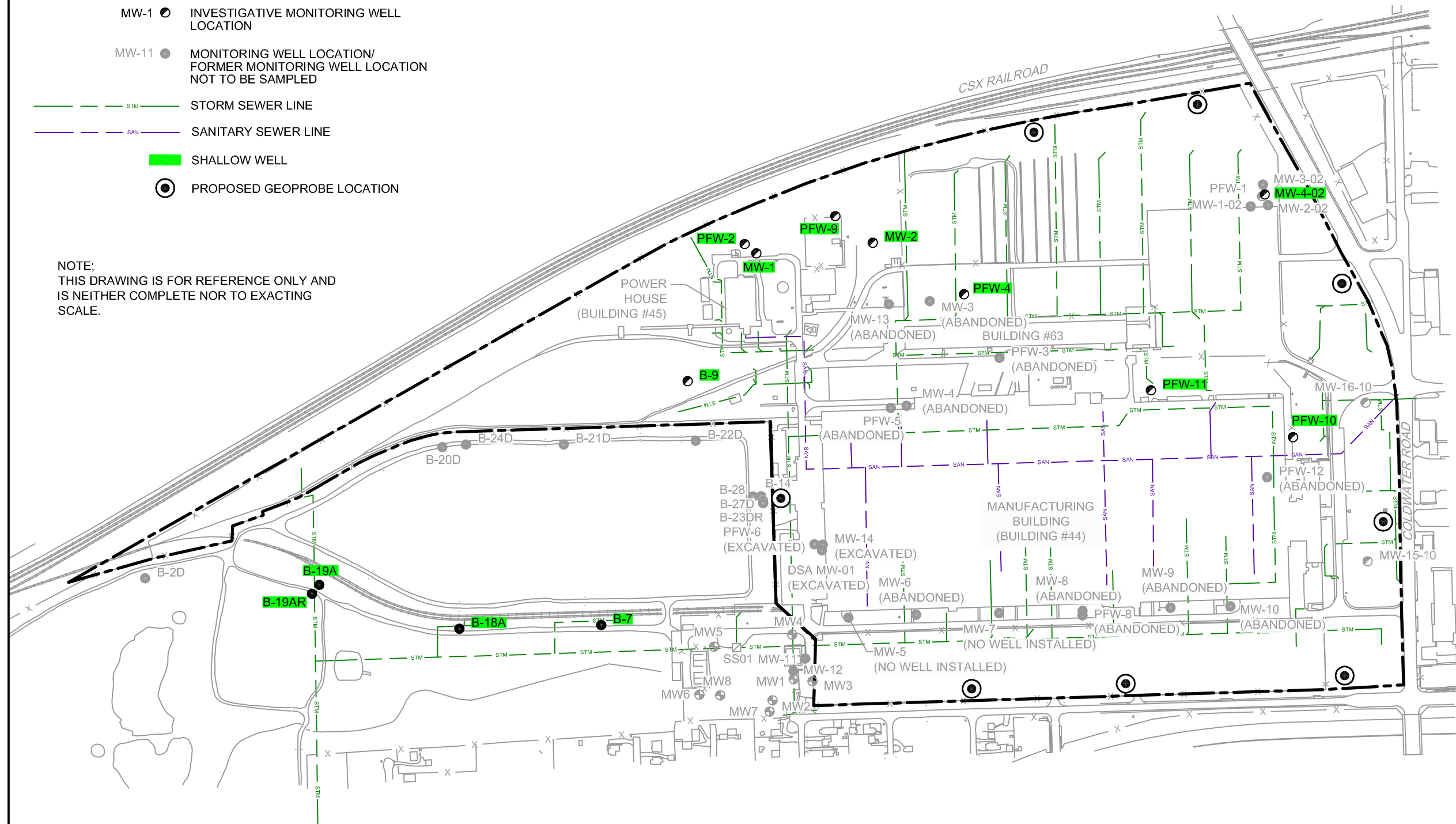


figure 3

2012 OFF-SITE MIGRATION INVESTIGATION LOCATIONS
FORMER PEREGRINE (US), INC. COLDWATER ROAD FACILITY
Genesee Township, Michigan

