



**Revitalizing Auto Communities
Environmental Response Trust**

February 27, 2013

Mr. Peter Ramanauskas
U.S. EPA Region 5
77 West Jackson Boulevard LU-9J
Chicago, Illinois 60604-3507

Dear Mr. Ramanauskas:

Subject: Application for Coordinated Approval in Accordance with 40 CFR §761.77(c); RACER Company Vehicle Operations Site (MIK468293311)

The Revitalizing Auto Communities Environmental Response Trust (RACER), in coordination with the Michigan Department of Environmental Quality (MDEQ), is requesting Toxic Substance Control Act of 1976 Coordinated Approval for the PAOC 18 Interim Measures Work Plan (IMWP) in accordance with the requirements of Title 40 of the Code of Federal Regulations (CFR) §761.77(c) for the RACER Company Vehicle Operations (CVO) site with polychlorinated biphenyl (PCB) contaminated environmental media.

RACER has submitted a request for EPA concurrence that the PCB conditions at this site arise from pre-1978 conditions and therefore only that portion of the site with PCBs in excess of 50 ppm will be governed by TSCA regulations due to agency discretionary determination of potential risk from PCBs in excess of 50ppm.

Therefore, in accordance with 40 CFR §761.77(a), we are submitting a copy of the PAOC 18 Interim Measures Work Plan which includes the scope of work, clean up levels, planned waste disposal facilities, previous sampling results, and additional characterization and verification sampling strategies.

The interim measure described in the IMWP has been prepared to address both chlorinated volatile organic compound (CVOC) and PCB impacts. Soil and groundwater impacts, including the presence of dense non-aqueous phase liquid (DNAPL) within the area, are the result of historic filling practices with industrial waste. RACER has been working with Mr. Kevin Lund, MDEQ Project Manager (517-780-7846) in evaluating several remedial strategies for the site.

The site is currently under MDEQ led Resource Conservation and Recovery Act (RCRA) Corrective Action due to the submission of a RCRA Part A Permit application in 1980 by GM, a former owner of the Site. The United States Environmental Protection Agency (U.S. EPA) identification number (ID) associated with the November 1980 RCRA Part A permit application, subsequent waste activities for the former site (which included the CVO property) and RCRA Corrective Action is MID005356795. This U.S. EPA ID is not currently used for any activity at

the CVO site. Currently the CVO site has large quantity generator status and uses U.S. EPA ID MIK468293311 for any waste shipments related to the environmental remediation work.

RCRA Corrective Action addresses impacts due to the release of hazardous substances. This interim measure addresses source removal at one area at the Site and will be completed as a portion of the overall RCRA corrective action at the Site. There are several other areas that will be addressed under the RCRA Corrective Action at the Site by additional interim measures and/or deed restrictions which include; i) a source area near the Haulaway building for impacted groundwater, ii) impacted groundwater along the southern boundary, and iii) impacted groundwater along the northern property boundary.

RACER is aware of and will adhere to the TSCA PCB reporting and recordkeeping requirements described in subparts J and K of 40 CFR 761 with respect to the TSCA EPA lead portion of the work. It is RACER's understanding that MDEQ guidance and Michigan Part 201 requirements will govern the non-EPA lead portions of the work.

RACER appreciates the guidance and assistance provided by the Region 5 TSCA Program. I look forward to receiving written agency approval of our application shortly after the MDEQ issues an approved decision document. If you have any questions or need additional information to provide the approval, please contact me at 313-670-6226.

Sincerely,



Grant Trigger
Cleanup Manager - Michigan

cc: Mr. Joe Cisneros, Environmental Protection Agency, Region 5
Ms. Jean Greensley, Environmental Protection Agency, Region 5
Ms. DeLores Montgomery, MDEQ
Mr. Kevin Lund, MDEQ
Dr. Deborah MacKenzie-Taylor, MDEQ
Mr. David Favero, RACER
Ms. Beth Landale, CRA