



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF  
ENVIRONMENT, GREAT LAKES, AND ENERGY  
LANSING DISTRICT OFFICE



LIESL EICHLER CLARK  
DIRECTOR

April 7, 2020

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

Dear Mr. Favero:

**SUBJECT:** Request for Additional Sampling of Perfluoroalkyl and Polyfluoroalkyl Substances (PFAS) at RACER Trust Hemphill Road Industrial Land— Burton, Genesee County, Michigan; Facility ID No.: 25000686

Per- and Polyfluoroalkyl Substances (PFAS) have been classified by the United States Environmental Protection Agency (USEPA) as an emerging contaminant; which means they present real or potential unacceptable human health risks and do not have peer-reviewed human health standards. PFAS are a class of chemicals historically used throughout the industrial, food, and textile industries. PFAS have been used in firefighting foams, food packaging, cleaning products, and various other products. PFAS have also been identified in landfill leachate. They are incredibly stable, breaking down very slowly in the environment and are highly soluble, easily transferring through soil to groundwater.

To respond to this emerging national public health issue, the Michigan Department of Environment, Great Lakes, and Energy (EGLE) has sampled for PFAS at all community water supplies that have their own source of drinking water, at all schools classified as Non-Transient Non-Community Water Systems, and at many lakes and streams. This monitoring is a proactive measure to identify where this emerging contaminant occurs and determine actions necessary to protect public health wherever it is found.

As of January 10, 2018, groundwater criteria for drinking water protection for two PFAS compounds (PFOA and PFOS) were established by EGLE under the authority of Part 201, Environmental Remediation, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. The groundwater criteria for drinking water protection is 0.07 ug/L (70 parts per trillion) for the combined concentrations of PFOA and PFOS. Additionally, EGLE announced in February 2020 that the state's Environmental Rules Review Committee approved draft rules limiting PFAS contamination in drinking water, moving them forward in the state rule-making process, which would result in even lower criteria for drinking water protection.

EGLE, Remediation and Redevelopment Division, has evaluated prior operations and waste disposal activities at the RACER Hemphill Road Industrial Land Landfill and determined an investigation to evaluate the potential presence of PFAS is needed. PFAS is a component in numerous consumer goods and wastes and has been identified at various landfills throughout the state. Based on the potential environmental and health concerns associated with PFAS and their potential presence at the RACER Hemphill Road Industrial Land

Landfill site, we are requesting that PFAS be added to the parameter list for groundwater sampling at a subset of existing monitor wells. Please provide a proposed plan, within 30 days, to evaluate for the presence of PFAS at the site.

Because PFAS compounds are commonly used in our environment, including in plumbing taps, cosmetics, cleaning products, and clothing, it is important to follow strict sampling protocols to reduce the possibility of cross contamination which could result in false positives.

For information on PFAS including a PFAS Sampling Guide, laboratories, educational materials, and possible health outcomes, you may visit these websites:

- **State of Michigan PFAS Action Response Team** webpage serving as the main resource for public information on PFAS contamination in Michigan: [www.michigan.gov/pfasresponse](http://www.michigan.gov/pfasresponse);
- **United States Environmental Protection Agency** webpage including basic information, USEPA actions, and links to informational resources: [www.epa.gov/pfas](http://www.epa.gov/pfas); and
- **Agency for Toxic Substances and Disease Registry** webpage including health information, exposure, and links to additional resources: [www.atsdr.cdc.gov/pfas](http://www.atsdr.cdc.gov/pfas)

If you have any questions regarding this request, please contact me at the telephone number below, or the project manager, Mr. Paul Bucholtz, at 517-243-7574, or email at [bucholtzp@michigan.gov](mailto:bucholtzp@michigan.gov).

Sincerely,



David LaBrecque, District Supervisor  
Lansing District Office  
Remediation and Redevelopment Division  
517-285-7889  
[labrecqued@michigan.gov](mailto:labrecqued@michigan.gov)

cc: Mr. Clifford Yantz, OBG  
Mr. David O'Donnell, EGLE  
Mr. Dan Rockafellow, EGLE  
Mr. Paul Bucholtz, EGLE