



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
MATERIALS MANAGEMENT DIVISION



PHILLIP D. ROOS
DIRECTOR

December 4, 2025

VIA EMAIL

Brendan Mullen, Cleanup Manager – Michigan
RACER Trust
1505 Woodward Avenue, Suite 200
Detroit, Michigan 48226-2043

Dear Brendan Mullen,

SUBJECT: Conditional Approval: *Building 44 Area Monitoring Well Abandonment Plan*; RACER Buick City; MID 005 356 712;
Waste Data System Number 393423

The Department of Environment, Great Lakes, and Energy (EGLE), Materials Management Division (MMD), reviewed the *Building 44 Area Monitoring Well Abandonment Plan* (Well Abandonment Plan), dated September 24, 2025, and prepared by Arcadis U.S., Inc. on behalf of the Revitalizing Auto Communities Environmental Response (RACER), Trust, for the Buick City facility located at 902 East Leith Street, Flint, Michigan. The Well Abandonment Plan was reviewed for compliance with Part 111, Hazardous Waste Management, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended, and its administrative rules promulgated thereunder (R 299.9629), and the August 5, 2020, Corrective Action Consent Order, MMD 111-02-2020 (CACO).

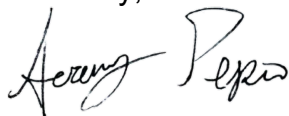
Based on this review, the Well Abandonment Plan is approved with the following conditions:

1. Pursuant to R 299.9629, monitoring well decommissioning procedures must either be in accordance with Standard Guide for Decommissioning of Groundwater Wells, Vadose Zone Monitoring Devices, Boreholes, and Other Devices for Environmental Activities (ASTM D5299-14), or a method approved by the director. The modified plug-in-place abandonment procedure described does not conform with ASTM D5299-14 and requires the director's approval. In general, MMD agrees that removing and/or perforating the well casings risks contaminant mobilization and/or hole collapse, and that leaving the casings in place provides an equal or greater level of protection. Therefore, MMD approves the modified plug-in-place procedure, with the following conditions:
 - If it is feasible to extract wells without hole collapse or other complications, MMD recommends extraction where practical.

- If it is not feasible and casings are left in place, the casings should be cut off to a depth of approximately two feet below ground surface before final grouting and plugging.
2. MMD agrees that additional monitoring wells should be installed to monitor the performance of the future groundwater extraction system proposed for this area. The number and location of wells will be determined at a later date.
 3. MMD requests that the following monitoring wells be retained:
 - SB-04-34 (4-9)
 - SB-04-69 (14-19)
 - SB-04-56 (14-19)
 - SB-04-57 (14-19)

MMD requests that RACER provide at least seven (7) days' notice prior to implementing the Well Abandonment Plan to allow MMD to observe the proposed field activities. Please contact me if you have any questions at 517-219-2288; PepinJ2@Michigan.gov; or EGLE-MMD-HWS@Michigan.gov.

Sincerely,



Jeremy Pepin, Environmental Engineer
Corrective Action Unit
Hazardous Waste Section
Materials Management Division
517-219-2288

cc: Dave Favero, RACER Trust, Deputy Cleanup Manager – Michigan
Patrick Curry, Vice President, Arcadis
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Conditional Approval – Work Plan – CA