



December 18, 2018

Reference No. 012607

*Distributed via E mail*

Mr. Greg Rudloff  
U.S. Environmental Protection Agency, Region 5  
Land and Chemicals Division  
77 West Jackson Blvd., LU 9J  
Chicago, Illinois 60604 3590

Dear Mr. Rudloff:

**Re: Groundwater Collection and Treatment System  
Request to Temporarily Cease Operations  
Docket Number RCRA 05 2011 0025  
13000 Eckles Road Site, Livonia, Michigan  
USEPA ID No. MID 005 356 621**

This letter has been prepared to request approval to alter the operations of the Area 1 Groundwater Collection and Treatment System (GWTP) at the Revitalizing Auto Communities Environmental Response Trust (RACER) Eckles Road Site located at 12950 Eckles Road in Livonia, Michigan. The Area 1 GWTP process was recently modified based on reduced influent concentrations of chromium and nickel. Perfluorinated compounds (PFAS) have been detected in the GWTP influent, and effluent discharged to the Great Lakes Water Authority (GLWA) sewer system. GLWA has recently requested the development of best management practice (BMP) plans for discharges containing PFAS above specific levels, including plans to reduce the concentration of PFAS in the discharge. While the previously approved PFAS Laboratory Treatability Study is performed, and the contingencies for the proposed permeable reactive gate are refined, RACER proposes to temporarily shut down groundwater pumping activities and periodically monitor groundwater elevations at select monitoring wells to evaluate the response of groundwater elevations within the containment area and whether pumping is required on a continuous basis. Groundwater elevations in up to 16 monitoring wells will be monitored with transducers to document changes, evaluate the potential risk of surface venting of groundwater (or flooding), and collect information to evaluate future pumping/dewatering requirements. Proposed monitoring well locations for groundwater elevation monitoring with transducers are presented on figure 1. Groundwater elevations in additional monitoring wells and portions of the French drain collection trench may be monitored periodically to support the generation of groundwater elevation contour figures and use of the Site-specific Groundwater Model to predict groundwater flow directions. The transducers are scheduled to be installed and activated on December 19, 2019. The GWTP will be shut down on Friday December 21, 2018 for two weeks for the holidays. At this time we are requesting that pumping be discontinued through June 30, 2019 unless a condition is observed before that time that would merit pumping be restarted.

We will provide USEPA a summary of the groundwater elevation measurements and preliminary findings in early April 2019 and follow that up with a final report before June 30, 2019.



Please contact Dave Favero or myself if you require would like to discuss further. Thank you.

Sincerely,

GHD

A handwritten signature in blue ink, appearing to read "CJ Meincke", with a stylized flourish at the end.

Christopher J. Meincke, P.E.

CJM/26/ds/Det.

cc: Grant Trigger, RACER  
Dave Favero, RACER  
Richard Conforti, MDEQ

