

Ms. Nicole Sanabria
Geologist
Materials Management Division
Department of Environment, Great Lakes, and Energy
PO Box 30473
Lansing, MI 48909-7973

RE: Comments on 2022 Cap Inspection Report – Letter Dated April 14, 2023
Coldwater Road Landfill
1245 East Coldwater Road, Flint, MI
MID 005 356 860
FILE: 1088190/1940103462/Corres

Dear **Ms. Sanabria**:

Date May 10, 2023

On behalf of Revitalizing Auto Communities Environmental Response (RACER) Trust, Ramboll Americas Engineering Solutions, Inc. (Ramboll), is providing the following responses to your comments concerning the Annual 2022 Cap Inspection Report provided in the Michigan Department of Environmental, Great Lakes, and Energy letter dated and received via email on April 14, 2023. The responses follow the same order as presented in your letter.

1. **Overgrown Cap Vegetation:** Cap vegetation must be regularly maintained at a height that will provide sufficient protection, but will not hinder inspections of the cap.

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RESPONSE:

The areas on the landfill cap with overgrown vegetation will be mowed with a brush hog during the next routine grass mowing at the site. The next grass mowing is currently being scheduled to take place prior to the June semiannual groundwater monitoring event. We will then need to see how these plants respond and evaluate if any further action is necessary to keep these plants under control.

We would like to remind EGLE that in 2004 EGLE approved changes to the Post-Closure Care Plan (PCCP) for the Site to allow “cessation of mowing of the landfill to reduce deer activity on the landfill cap.” Mowing the vegetative cover promoted growth of clover and alfalfa which attracted a herd of about 50 deer and the deer were disturbing the upper soil of the cap. The number of deer quickly subsided following cessation of mowing and the promotion of slightly taller grass on the landfill, and the remaining deer have not disturbed the upper soil since.

2. **Small Woody Plants:** The various small woody plants indicated in Attachment 1 must be removed from the Cap. Photo-documentation of the repaired area must be provided within 30 days of receipt of this report.

RESPONSE:

On April 21, 2023, Ramboll removed one woody plant identified in Attachment 1 from Cell E of the landfill by digging the woody plant up by the root. Please see the attached Photographic Log of the repaired areas. The remaining plants removed, as documented in the attached Photographic Log, were tall non-woody plants with shallow roots, which include the plants that EGLE is concerned with in Comment 1 and are especially located in portions of the southern third of the landfill.

Ramboll on behalf of RACER Trust has over the years and will continue to work to maintain the integrity of the cap, which starts with maintaining good vegetative growth and preventing growth of deep-rooted plants.

If you have any questions, feel free to contact me at (313) 333-0211.

Yours sincerely



Clifford Yantz

Project Manager

M 313-333-0211

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|---|--|
| <p>Location: Cell C</p> |  |
| <p>Date: April 21, 2023</p> <p>Inspection issue 1: Small woody plants.</p> <p>Picture taken prior to corrective measure. Plant was down on arrival.</p> | |
| <p>Location: Cell C</p> |  |
| <p>Date: April 21, 2023</p> <p>Inspection issue 1: Small woody plants.</p> <p>Picture taken post corrective measure. Plant was removed by the root.</p> <p>The roots were observed to be shallow, and this appears to be an annual plant and not a woody perennial plant.</p> | |

Location: Cell E

Date: April 21, 2023

Inspection issue 2:
Small woody plant.

Picture taken prior to
corrective measure.



Location: Cell E

Date: April 21, 2023

Inspection issue 2:
Small woody plant.

Picture taken post
corrective measure.
Woody plant was
removed by the root.



Location: Cell D

Date: April 21, 2023

Inspection issue 3:
Small woody plants.

Picture taken prior to
corrective measure.



Location: Cell D

Date: April 21, 2023

Inspection issue 3:
Small woody plants.

Picture taken post
corrective measure.
Plants were removed
by the root.

Appeared to have
shallow roots and
does not appear to
be a woody perennial
plant.



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| <p>Location: Cell D</p> |  |
| <p>Date: April 21, 2023</p> <p>Inspection issue 4: Small woody plants.</p> <p>Picture taken prior to corrective measure.</p> | |
| <p>Location: Cell D</p> |  |
| <p>Date: April 21, 2023</p> <p>Inspection issue 4: Small woody plants.</p> <p>Picture taken post corrective measure. Plants were removed by the root.</p> <p>Appeared to have shallow roots and does not appear to be a woody perennial plant.</p> | |

Location: Cell C

Date: April 21, 2023

Inspection issue 5:
Overgrown
vegetation, possible
woody plants.

Picture taken prior to
corrective measure.
Plants were down
upon arrival and
decomposed.



Location: Cell C

Date: April 21, 2023

Inspection issue 5:
Overgrown
vegetation, possible
woody plants.

Picture taken post
corrective measure.

Appeared to have
shallow roots and
does not appear to
be a woody perennial
plant.



Location: Cell C

Date: April 21, 2023

Inspection issue 6:
Small woody plants.

Picture taken prior to
corrective measure.
Plant was down on
arrival.



Location: Cell C

Date: April 21, 2023

Inspection issue 6:
Small woody plants.

Picture taken post
corrective measure.

Appeared to have
shallow roots and
does not appear to
be a woody perennial
plant.



Location: Cell C

Date: April 21, 2023

Inspection issue 7:
Small woody plant.
Plant was down on arrival.

Picture taken prior to corrective measure.



Location: Cell C

Date: April 21, 2023

Inspection issue 7:
Small woody plant.

Picture taken post corrective measure.

Appeared to have shallow roots and does not appear to be a woody perennial plant.

