



**CONESTOGA-ROVERS
& ASSOCIATES**

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November 6, 2013

Reference No. 017358

Mr. Kevin Lund
Department of Environmental Quality
Remediation Division
Jackson District Office
301 East Louis Glick Highway
Jackson, Michigan
49201-1556

Dear Mr. Lund:

Re: Soil and Groundwater Investigation Work Plan
Southern Willow Run Airport Off-Site Parcel Land Swap
Former Willow Run Plant
2930 Ecorse Road
Ypsilanti, Michigan

On behalf of Revitalizing Auto Communities Environmental Response Trust (RACER), Conestoga-Rovers & Associates, Inc. (CRA) has prepared this letter to summarize the proposed soil and groundwater investigation work plan to assess the off-Site parcel to the south of the Former Willow Run Plant (Site) located in Ypsilanti, Michigan for review by the Michigan Department of Environmental Quality (MDEQ). The off-Site parcel is part of a planned "land-swap" between RACER and the Willow Run Airport, who owns the parcel.

1.0 BACKGROUND

Site Disposition: The off-Site parcel is directly south of the Site, triangular, approximately 26 acres, and includes a waste water treatment plant (WWTP), associated outbuildings, parking lots, and abandoned and functioning underground utilities. Willow Run Airport currently owns the off-Site parcel, which RACER is leasing.

Historical Site Operations and Infrastructure: Historically a cyanide waste line ran from the northwest corner towards the southeast corner of the parcel. The line has since been abandoned and capped. The historic cyanide waste line has previously been identified as a Potential Area of Concern (PAOC). Historically, an underground effluent line from the on-Site WWTP bisected the site from the north-central portion towards the south-central portion of the off-Site parcel and continued under Airport Road towards the Ypsilanti Community Utility Authority waste water transfer station. The current status of the line is unknown. A truck driving school operated in the western portion of the Site during portions of the 1970's and 1980's.

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Current Site Conditions: During Site evaluations within the last three years CRA has observed stained and cracked concrete between Tanks 3 and 4 (i.e., the two southern large tanks) of the off-Site parcel WWTP.

In the February 2012 Resource Conservation and Recovery Act Facility Investigation Work Plan (RFI Work Plan) prepared by CRA, six soil borings and shallow monitoring wells were proposed to investigate the WWTP on the off-Site parcel. Due to access and property negotiation issues, these locations have not been completed to date. The proposed investigation described below follows the general intent of the work outlined in the RFI Work Plan though several additional locations have been added to assess any potential concerns within the greater area of the entire off-Site parcel and several of the monitoring wells proposed near the WWTP were switched to soil borings due to the greater spatial coverage of the entire investigation.

2.0 SCOPE OF WORK

To assess the environmental quality of the off-Site parcel, CRA proposes installing approximately 5 soil borings and 6 shallow monitoring wells. Proposed soil boring and monitoring well locations are presented on Figure 1. Four monitoring wells and two soil borings (CRA-838M, CRA-839M, CRA-840SB, CRA-841M, CRA-842SB, CRA-843M) will be installed in the vicinity of the WWTP, including one monitoring well between Tanks 3 and 4. (It is worth noting that while the RFI Work Plan called for 6 monitoring wells to investigate the WWTP on the off-Site parcel, the scope of work encompassed in this proposal includes a broader investigation of the entire off-Site parcel, therefore a combination of monitoring wells and soil borings will be sufficient to assess the WWTP.) A soil boring and a monitoring well (CRA-844SB and CRA-845M) will be installed adjacent to the historic cyanide waste line and within the approximate area of the former truck driving school. Two soil borings (CRA-846SB and CRA-847SB) will be installed adjacent to the historic WWTP effluent line. A single monitoring well (CRA-848M) will be installed in the southeast corner of the off-Site parcel to verify perimeter conditions to the southeast.

Soil borings will be advanced utilizing a direct push rig equipped with a 2-inch macrocore probe. Continuous soil samples will be collected to record stratigraphy and to screen for organic vapors using a photoionization detector (PID). Locations that will not be completed as monitoring wells will be advanced until the saturated conditions are encountered. Locations that will be completed as monitoring wells will be advanced 0.5 feet into the underlying clay. Soil samples for laboratory analysis will be collected from 0 to 2 feet bgs, the interval 2 feet above the water table, and from a maximum of one additional interval that is deemed significantly impacted in the field (elevated PID readings, odors, staining, etc.).



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Shallow groundwater monitoring wells will be installed using 4 ¼ inch inside diameter hollow-stem augers. A 2-inch diameter, schedule 40, PVC well will be installed with a schedule 40 PVC 0.010-inch machine slotted screen. Based on current knowledge of the geology in the area it is anticipated that the monitoring wells will screen the entire saturated shallow zone plus at least 2 feet above the water table, with a maximum screen length of 10 feet and that screens will be advanced 0.5 feet into the underlying clay.

Groundwater samples will be collected using low-flow purging techniques similar to those used during the RFI activities on-Site. Soil and groundwater samples will be shipped on-ice to TestAmerica in North Canton, Ohio under standard chain of custody protocols. Soil and groundwater sample analytes are listed in Table 1.

3.0 SCHEDULE

Given the time-sensitive nature of the real estate interests between RACER and Willow Run Airport, CRA proposes completing the proposed investigation during the week of November 11, 2013. CRA requests written authorization via email to proceed with the proposed work plan.

Please feel free to contact CRA at (734) 453-5123 to further discuss this Work Plan.
Yours truly,

CONESTOGA-ROVERS & ASSOCIATES

Beth Landale
HWH/2/Det
Encl.

cc: Grant Trigger, RACER
David Favero, RACER

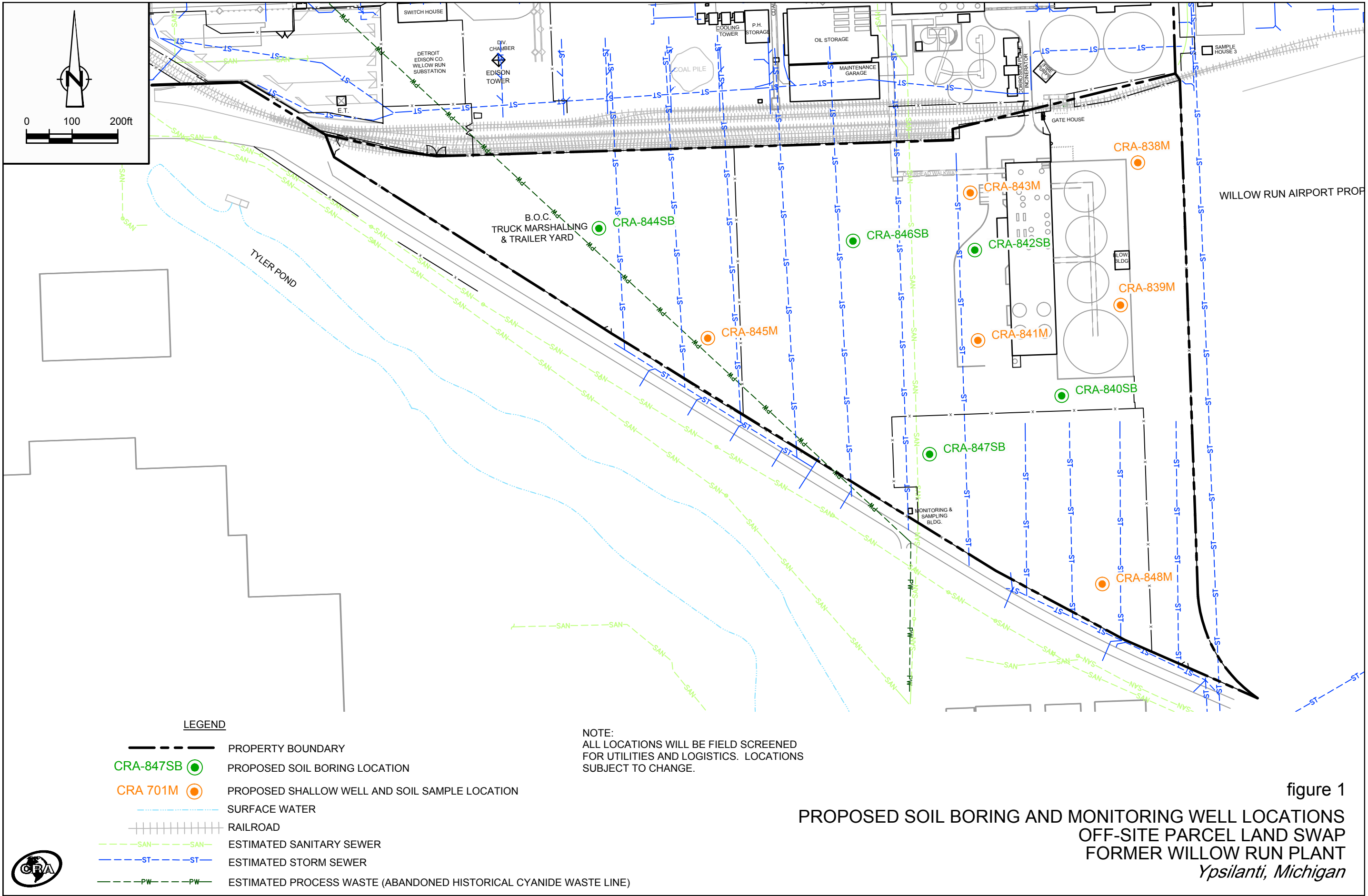


figure 1

SOIL SAMPLING AND MONITORING WELL INSTALLATION PLAN
OFF-SITE PARCEL LAND SWAP
FORMER WILLOW RUN PLANT
YPSILANTI, MICHIGAN

Boring/Well Number	Target Depth	Soil Sample Intervals (feet bgs) ¹	Soil Analysis ²	Screen Installation Interval	Groundwater Analysis ²	Sampling Reason
CRA-838M	0.5 feet into clay	• 0-2 • 2 feet above water table • Up to one additional interval with high PID, staining, etc.	TCL VOCs, TCL SVOCs, Site-Specific TAL Metals, PCBs, Fine/Coarse Pb if >75 ppm	Screen entire length shallow zone (2 feet above water table, 0.5 feet into clay). Screen length TBD in field, max 10 feet. Bias towards water table if saturated zone > 8 feet.	TCL VOCs, TCL SVOCs, Site TAL Metals, PCBs	• Off-Site Parcel Investigation • Wastewater Treatment Plant
CRA-839M	0.5 feet into clay	• 0-2 • 2 feet above water table • Up to one additional interval with high PID, staining, etc.	TCL VOCs, TCL SVOCs, Site-Specific TAL Metals, PCBs, Fine/Coarse Pb if >75 ppm	Screen entire length shallow zone (2 feet above water table, 0.5 feet into clay). Screen length TBD in field, max 10 feet. Bias towards water table if saturated zone > 8 feet.	TCL VOCs, TCL SVOCs, Site TAL Metals, PCBs	• Off-Site Parcel Investigation • Wastewater Treatment Plant (specifically concrete staining near Tanks 3 and 4)
CRA-840SB	Water Table	• 0-2 • 2 feet above water table • Up to one additional interval with high PID, staining, etc.	TCL VOCs, TCL SVOCs, Site-Specific TAL Metals, PCBs, Fine/Coarse Pb if >75 ppm	-	-	• Off-Site Parcel Investigation • Wastewater Treatment Plant
CRA-841M	0.5 feet into clay	• 0-2 • 2 feet above water table • Up to one additional interval with high PID, staining, etc.	TCL VOCs, TCL SVOCs, Site-Specific TAL Metals, PCBs, Fine/Coarse Pb if >75 ppm	Screen entire length shallow zone (2 feet above water table, 0.5 feet into clay). Screen length TBD in field, max 10 feet. Bias towards water table if saturated zone > 8 feet.	TCL VOCs, TCL SVOCs, Site TAL Metals, PCBs	• Off-Site Parcel Investigation, • Wastewater Treatment Plant
CRA-842SB	Water Table	• 0-2 • 2 feet above water table • Up to one additional interval with high PID, staining, etc.	TCL VOCs, TCL SVOCs, Site-Specific TAL Metals, PCBs, Fine/Coarse Pb if >75 ppm	-	-	• Off-Site Parcel Investigation • Wastewater Treatment Plant
CRA-843M	0.5 feet into clay	• 0-2 • 2 feet above water table • Up to one additional interval with high PID, staining, etc.	TCL VOCs, TCL SVOCs, Site-Specific TAL Metals, PCBs, Fine/Coarse Pb if >75 ppm	Screen entire length shallow zone (2 feet above water table, 0.5 feet into clay). Screen length TBD in field, max 10 feet. Bias towards water table if saturated zone > 8 feet.	TCL VOCs, TCL SVOCs, Site TAL Metals, PCBs	• Off-Site Parcel Investigation • Wastewater Treatment Plant
CRA-844SB	Water Table	• 0-2 • 2 feet above water table • Up to one additional interval with high PID, staining, etc.	TCL VOCs, TCL SVOCs, Site-Specific TAL Metals, PCBs, Fine/Coarse Pb if >75 ppm, Amenable Cyanide	-	-	• Off-Site Parcel Investigation • Historic Cyanide Waste Lines • Former Truck Driving School
CRA-845M	0.5 feet into clay	• 0-2 • 2 feet above water table • Up to one additional interval with high PID, staining, etc.	TCL VOCs, TCL SVOCs, Site-Specific TAL Metals, PCBs, Fine/Coarse Pb if >75 ppm, Amenable Cyanide	Screen entire length shallow zone (2 feet above water table, 0.5 feet into clay). Screen length TBD in field, max 10 feet. Bias towards water table if saturated zone > 8 feet.	TCL VOCs, TCL SVOCs, Site TAL Metals, PCBs, Amenable Cyanide	• Off-Site Parcel Investigation • Historic Cyanide Waste Lines • Former Truck Driving School
CRA-846SB	Water Table	• 0-2 • 2 feet above water table • Up to one additional interval with high PID, staining, etc.	TCL VOCs, TCL SVOCs, Site-Specific TAL Metals, PCBs, Fine/Coarse Pb if >75 ppm	-	-	• Off-Site Parcel Investigation, • Historic WWTP Effluent Line
CRA-847SB	Water Table	• 0-2 • 2 feet above water table • Up to one additional interval with high PID, staining, etc.	TCL VOCs, TCL SVOCs, Site-Specific TAL Metals, PCBs, Fine/Coarse Pb if >75 ppm	-	-	• Off-Site Parcel Investigation, • Historic WWTP Effluent Line
CRA-848M	0.5 feet into clay	• 0-2 • 2 feet above water table • Up to one additional interval with high PID, staining, etc.	TCL VOCs, TCL SVOCs, Site-Specific TAL Metals, PCBs, Fine/Coarse Pb if >75 ppm	Screen entire length shallow zone (2 feet above water table, 0.5 feet into clay). Screen length TBD in field, max 10 feet. Bias towards water table if saturated zone > 8 feet.	TCL VOCs, TCL SVOCs, Site TAL Metals, PCBs	• Off-Site Parcel Investigation

Notes

SB - soil boring

M - monitoring well installed to screen shallow zone

¹ 0-2 feet bgs interval will be based on field conditions and will represent a 2 foot interval beneath concrete or asphalt and subslab fill

² "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods" SW846, 3rd Edition, updated November 1986

TCL

TAL

VOCs

SVOCs

PCBs

Inorganics

Fine/Coarse Pb

Amenable Cyanide

Target compound list

Target analyte list

U.S. EPA Method SW846-8260

U.S. EPA Method SW846-8270

U.S. EPA Method SW846-8082

U.S. EPA Method SW846-6000/7000 series

If totals analysis indicates that lead is present at concentrations greater than 75 ppm, the laboratory will analyze for fine and coarse grain.

U.S. EPA Method SW846-9012