



July 12, 2023

Mr. Brian Zuber  
Michigan Department of Environment, Great Lakes, and Energy  
Water Resources Division  
525 W. Allegan Street  
P.O. Box 30241  
Lansing, Michigan 48909-7741

Subject: Suspension of Certain NPDES Sampling Requirements  
RACER Buick City Site (NPDES Permit No. MI0001597)

Dear Brian:

As you may recall we previously explained that the cost of certain NPDES permit required sampling at the Buick City Site (Permit No. MI0001597) did not provide any material value given our limited resources and the emergence of significant PFAS issues at the site. As you know RACER has consistently committed to compliance with Michigan environmental laws and regulations. However, due to discovery of PFAS at the Site in 2018, the remediation budget has been exhausted requiring a transfer of RACER Trust cushion funds to support further work.

Based on the projected spend to address PFAS issues at Michigan sites, including Buick City, it is expected the available funds will be depleted before all PFAS remediation activities in Michigan are completed. It is imperative that all tasks that do nothing to effectively manage real and identified risks be deferred and be directed to meaningful risk management.

As such, until further notice or unless additional funds are identified RACER is proposing to limit expenditures to work that is necessary to reduce risk on the Site. Currently, some of the tasks under the NPDES permit that do little to reduce risk include:

- Weekly sampling of monitoring point 003A and analysis for PCBs
- Yearly wet weather sampling for a variety of parameters at a few of the outfalls with a subsequent annual summary submitted through MIWaters.
- A yearly Pollutant Minimization Plan (PMP) update for PCBs submitted through MIWaters.

For example, the Outfall 003A weekly PCB monitoring data since June of 2013 is summarized below:

- Approximately 520 PCB samples have been collected from June 2013 (just after the last detection in May 2013) through June 2023 with only one marginal detection that could not be replicated.
- Summary of PCB detections since June 2013
  - February 2018 – lab contamination
  - October 2018 – PCB detection
  - February 2019 – lab contamination

PCB concentrations for these 3 detections were just above the reporting limit (0.1 ug/L). The last PCB detection at Outfall 003A not attributed to lab contamination was in October 2018. In that instance an additional sample was collected after discovering the detection and the sample concentration was below the reporting limit. Moreover, in the last 5 years approximately 260 samples have been collected for PCB analysis and concentrations have all been below the reporting limit. It is clear that the weekly PCB sampling at monitoring point 003A provides no meaningful risk reduction at the Site.

The yearly wet weather sampling also provides no additional risk reduction, as no impacts have been observed since 2010. Moreover, the PCB PMP updates are no longer necessary because the PCB discharge to the outfalls have been eliminated due to bulkheading and plugging of selected storm sewers and storm sewer laterals on the Site, and the reroute of the Outfall 003 storm sewer, which permanently routed stormwater flow around known areas containing PCBs in the Northend of the Site.

In anticipation that the discussions on a proposed ACO would conclude by mid-2023 the 2023 budget was approved for only 6 months. With no budget currently approved for these tasks they will not be completed – due to the lack of approved budget and no risk management value offered by these tasks.

Semi-annual inspections of the Site and annual updates under the Stormwater Pollution Prevention Plan (SWPPP) will continue on the portions of the site RACER still owns.

If you have any questions, please feel to call me at 313-670-6226 or Chris Peters at 517-927-3611.

Sincerely,



Grant Trigger  
Cleanup Manager – Michigan

cc: Dale Bridgford, MMD  
Tianna Kilgore, MMD  
Stephanie Kammer, WRD  
Chris Peters, ARCADIS