



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING



DAN WYANT
DIRECTOR

June 30, 2015

Mr. Dave Favero
RACER Trust
500 Woodward Avenue, Suite 1510
Detroit, Michigan 48226

RECEIVED JUN - 9 2015

Dear Mr. Favero:

SUBJECT: Comments on Supplemental Groundwater Monitoring Annual Monitoring Report (March 31, 2014 to April 30, 2015) (Report); RACER Former Peregrine, Inc., Coldwater Road Facility (Facility), Genesee Township, Michigan; MID 000 020 743

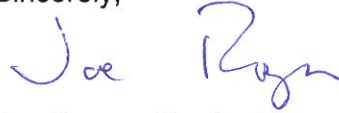
The staff of the Michigan Department of Environmental Quality (MDEQ), Office of Waste Management and Radiological Protection (OWMRP), has received and reviewed the June 23, 2015, Report prepared by Conestoga-Rovers & Associates (CRA) detailing the results of the groundwater monitoring program between March 31, 2014, and April 30, 2015, at the Facility.

The Report was reviewed for compliance with the applicable provisions of Part 111, Hazardous Waste Management, and Part 201, Environmental Remediation, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended, and its administrative rules, Michigan Administrative Code R 299.5101 *et seq.*, and the Supplemental RCRA Facility Investigation (RFI) Groundwater Investigation Work Plan and Groundwater Monitoring Plan, which was approved by the MDEQ on October 15, 2013. Based on this review, the OWMRP has the following comments on the Report.

1. Based on the Monitoring Well Records for Low-Flow Purging presented in Appendix A of the Report, there are several wells where excessive drawdown was documented and stabilization of the water level did not occur within the well screen. These wells include: B-9, PFW-4, MW-18-13, PFW-11, MW-16-10, PFW-10, MW-1, and MW-2. In order to collect a more representative sample for analysis, in future sampling events the OWMRP recommends that these wells be purged to dryness followed by sample collection as soon as possible after sufficient recharge occurs.
2. The Report documents damages to several monitoring wells over the reporting period. The OWMRP recommends that RACER implement procedures to more clearly identify the locations of the monitoring wells, and/or construct protective barriers around the wells to minimize the potential for damages to monitoring wells in the future.
3. The OWMRP approves all of the recommendations proposed by RACER in Section 4.0 of the Report with the exception of the elimination of volatile organics from the monitoring program; these should be retained as specified in the approved Work Plan.

Please provide a response to these comments within 30 days from the receipt of this letter. Should you require further information, please contact Mr. Rich Conforti at 517-284-6558; confortir@michigan.gov; or MDEQ, OWMRP, P.O. Box 30241, Lansing, Michigan 48909-7741.

Sincerely,



Joe Rogers, Geologist
Hazardous Waste Section
Office of Waste Management and
Radiological Protection

cc: Mr. Grant Trigger, RACER Trust
Mr. Mike Tomka, CRA
Mr. William Yocum, MDEQ
Mr. Richard Conforti/Mr. Joe Rogers, MDEQ
Corrective Action File