



REGION 5

CHICAGO, IL 60604

June 16, 2026

ELECTRONIC MAIL
RETURN RECEIPT REQUESTED

Brendan Mullen
Michigan Cleanup Manager
RACER Trust
660 Woodward Avenue, Suite 1521
Detroit, MI 48226
bmullen@racertrust.org

RE: Groundwater Monitoring Plan (2025 Modification)
2026 Fiero Temporary Monitoring Plan
RACER Trust Pontiac North Campus
Pontiac, Michigan
EPA ID: MID005356886

Dear Mr. Mullen:

The U.S. Environmental Protection Agency (EPA) reviewed the following documents submitted by Arcadis of Michigan, LLC on behalf of the RACER Trust for the Pontiac North Campus in Pontiac, Michigan (Facility):

- May 12, 2026 *Groundwater Monitoring Plan (2025 Modification)* (GMP), and
- May 22, 2026 Memo with the subject, "RACER Pontiac North Campus 2026 Fiero Temporary Monitoring Plan" (Fiero TMP).

RACER sufficiently addressed the comments provided by the EPA on March 16, 2026, and the EPA approves the GMP and Fiero TMP with the following conditions:

1. As proposed in Section 3 of the GMP, RACER will submit a work plan in 2026 proposing additional wells around the perimeter of the groundwater restriction area. Data from these wells will be used to demonstrate the extent of impact above the drinking water criteria has been fully delineated.
2. RACER will prepare and obtain EPA approval of an updated Quality Assurance Project Plan (QAPP). Paragraph 24.g. of the Administrative Order on Consent (Order) between the EPA and RACER requires that all sampling and analysis conducted under the Order will be performed in accordance with the Region 5 RCRA Quality Assurance Project Plan Policy, currently called the [Environmental Information Quality Policy](#). Consistent with the [EPA Quality Assurance Project](#)

[Plan Standard](#), which is referenced in the Environmental Information Quality Policy, facilities performing work under a QAPP must submit an updated QAPP to the EPA for review and approval prior to the fifth anniversary of the signature date of the QAPP. The EPA was not able to locate a QAPP for the Facility that was prepared within the required five-year timeframe.

Please submit within 90 days a QAPP that includes all sampling currently conducted and planned at the Facility (e.g., groundwater, soil gas, indoor air, and soil sampling). The following links provide information to support development of the updated QAPP:

- Quality Assurance Project Plan Standard Directive No. CIO 2105-S-02.1:
https://www.epa.gov/system/files/documents/2024-04/quality_assurance_project_plan_standard.pdf
 - Quality Assurance Project Plan Guidance: <https://www.epa.gov/quality/quality-assurance-project-plan-qapp-guidance>
 - Uniform Federal Policy for Quality Assurance Project Plans - Training Materials:
<https://www.epa.gov/fedfac/uniform-federal-policy-quality-assurance-project-plans-training-materials>
 - UFP-QAPP Optimized worksheets from 2012:
https://www.epa.gov/sites/default/files/documents/ufp_qapp_worksheets.pdf
3. Prior to conducting the 2027 sampling, RACER will prepare and obtain approval from the EPA of an updated GMP that aligns with the QAPP. Please include the following information in the QAPP or the GMP:
- a. The decision criteria RACER will use to evaluate the data and determine whether changes to the GMP or other actions are needed. For instance, an increasing trend(s) could indicate a change is needed to the GMP. The decision criteria could be added to Section 5 which states, “The annual report will also propose changes to the GMP for future annual sampling events, as appropriate, based on the results of the sampling.”
 - b. Details for how RACER will conduct and evaluate the results of the Mann-Kendall (MK) analysis. Appendix A describes how the MK analysis was previously conducted and can be largely replicated in the body of the GMP to describe future MK analysis. Please ensure the description of the analysis includes the following:
 - i. Reference the specific statistical methods/software that will be used to conduct the MK Test.
 - ii. Section 1.2 discusses how the data set will be selected for each well and specifies the number of observations (n) that will be used in the analysis. Please ensure a minimum of 8 sampling events is used. A higher n value will have a higher likelihood of detecting a trend if one is present.
 - iii. Indicate how censored data, such as non-detects, will be accounted for/applied during MK analysis. Please note that if substitution is used it’s imperative that a uniform value is assigned for non-detects for each analyte per well. Often this value will be based on an analyte’s minimum detection limit, which can vary at times throughout a time series for several reasons (changes in lab methodology, dilution, etc.). The MK test adjusts for tied observations meaning applying

different values for non-detects would impact this adjustment. Substituting non-detect values with $\frac{1}{2}$ the detection limit is typically sufficient for non-parametric tests in most cases.

- iv. Discuss criteria, if any, for the further evaluation of “no significant trend” conditions. As identified in Table A-1, the output of the MK analysis provides an evaluation of whether the trend is statistically increasing, statistically decreasing, or there is no statistically significant trend. The EPA recommends using the coefficient of variation (COV) to determine whether a “no significant trend” result could indicate a “stable” result. Depending on the values of the *S* Statistic and the COV, sampling locations that exhibit a low (< 90%) Confidence Factor (equal to [1-p]%) can be designated as either “stable” ($S \leq 0$ and $COV < 1$) or “no trend” ($COV \geq 1$).

Please submit the GMP at least 120 days in advance of the anticipated sampling date to provide sufficient time for review and revision of the document, as needed. Section 3.3 of the GMP states the annual groundwater sampling event will be conducted during the third quarter starting in 2027. Since the 2026 sampling event was conducted in March, the EPA recommends conducting the 2027 event in June to minimize the gap in timing of the annual sampling events.

4. Prior to conducting the 2027 sampling, RACER will prepare and obtain approval from the EPA of an updated Fiero TMP that aligns with the QAPP. Please include the following information in the QAPP or the Fiero TMP:
 - a. The decision criteria RACER will use to evaluate whether changes to the Fiero TMP or other actions are needed. For instance, an increasing trend(s) could indicate a change is needed to the TMP.
 - b. Details for conducting and evaluating the results of the MK analysis that includes the information described in Condition 3.b. above.

Please submit the Fiero TMP at least 120 days in advance of the anticipated first 2027 sampling date to provide sufficient time for review and revision of the document, as needed. RACER may elect to combine the GMP and Fiero TMP to streamline planning and reporting efforts.

I would be happy to discuss the requirements for the requested documents during our next monthly call. As always, please feel free to contact me at (312) 886-0681 or stanhope.jennifer@epa.gov if you have any questions.

Sincerely,

Jennifer Stanhope, P.E.
Project Manager
RCRA Hazardous Waste Cleanup Program
Land, Chemicals, and Redevelopment Division

e-cc: Dave Favero, RACER Trust, dfavero@racertrust.org