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STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING

RICK SNYDER
GOVERNOR

DAN WYANT
DIRECTOR

June 10, 2011

Mr. Michael R. Tomka, P.E.
Conestoga Rovers and Associates
651 Colby Drive
Waterloo, Ontario, N2V 1C2
Canada

SUBJECT: Concerns Regarding Response to Michigan Department of Environmental Quality (MDEQ) March 29, 2011, Comments and Revised Monitoring Well Installation and Groundwater Monitoring Report; Former Peregrine (US), Inc. (Peregrine), Coldwater Road Facility, Genesee Township, Michigan; MID 000 020 743

Dear Mr. Tomka:

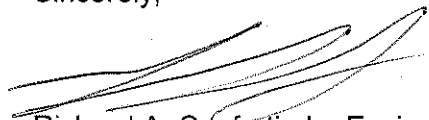
Staff of the MDEQ, Resource Management Division (RMD), Hazardous Waste Section, has received and reviewed the subject document dated May 9, 2011. The document was reviewed for compliance with the applicable provisions of Part 111, Hazardous Waste Management, and Part 201, Environmental Remediation, of 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 Investigation Work Plan approved on October 28, 2010 (Work Plan). Based on our review, the RMD has two significant concerns about statements made in the document:

1. With respect to the response to our comment 3b - you state that you will conduct a background study to evaluate whether or not metals concentrations above applicable criteria may be background concentrations. This is consistent with our recommendations, but the document does not provide any additional details on conducting this study other than the plan to sample two upgradient wells (B-2D and B-19A). Please provide a detailed plan for conducting this study that includes the number of sampling events, parameters, methods, statistical procedures, etc., so that we are in mutual agreement that the study will be acceptable for defining representative background concentrations.
2. With respect to the response to our comment 3c - the document appears to state that there is no possibility for off-site migration of contaminated groundwater since there is no continuous shallow groundwater system and, as such, that no further investigation is required. The RMD cannot accept this conclusion without a definitive demonstration that no off-site migration of contaminated groundwater is occurring. The hydrogeology of this site has proven complex and, the Groundwater Not In An Aquifer (GWNIAA) demonstration previously submitted was denied by the MDEQ. The demonstration that contaminated groundwater is not migrating off site needs to combine information generated by the site specific background study for metals (to determine if migration of

metals in site groundwater needs to be further considered) along with additional downgradient monitoring at the property border (for metals, as appropriate, and volatile organic compounds) and specific consideration of potential migration via storm sewers and utility corridors (preferential pathways). Once site specific background values are determined, we request that you provide a proposal for downgradient groundwater monitoring, including well locations, interval screened, analytical parameters, and other pertinent information.

Please provide the requested information within sixty days of the receipt of this letter. Should you require further information, please contact me at 517-241-2108; confortir@michigan.gov; or MDEQ, P.O. Box 30241, Lansing, Michigan 48909-7741.

Sincerely,



Richard A. Conforti, Jr., Environmental Engineer
Hazardous Waste Section
Resource Management Division
517-241-2108

cc: Mr. Dave Favaro, RACER Trust
Ms. Virginia Himich, MDEQ/EPA Reporting
Mr. John McCabe, MDEQ
Mr. Joe Rogers, MDEQ
Mr. William Yocum, MDEQ
Corrective Action File