

SUBJECT
Short-Term Construction Monitoring Update

TO
Grant Trigger, RACER
Brendan Mullen, RACER

DATE
March 13, 2024

PROJECT NUMBER
30215500

COPIES TO
Chris Peters

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This memo provides an update to the *Short-Term Slab Construction Groundwater Monitoring Plan* previously submitted on April 7, 2023, for the RACER Buick City Site (Site). Based on Site redevelopment plans the baseline short-term construction monitoring (STCM) sampling was completed at the Northend of the Site in May, August, and November 2023 and January 2024 (**Figure 1**). The updated plan for sampling during construction activities is provided below.

Monitoring During Construction Activities

Construction activities are expected to begin at the 65-acre parcel located north of Leith Street (**Figure 2**) in April 2024. Monitoring wells were abandoned in this parcel in preparation for construction activities. A memorandum summarizing the well abandonment activities will be submitted separately. Groundwater monitoring will take place in a reduced number of existing monitoring wells outside of the construction area. Quarterly monitoring will continue during concrete slab removal and construction activities until surface cover is replaced over the restricted areas. Specifically, groundwater samples and groundwater levels will be collected from monitoring wells RFI-23-01R, RFI-12-40, RFI-81-12R, and RFI-81-33 located south of Leith Street and east of the railroad tracks (**Figure 2**). Samples will also be collected from the drainage structures located east and west of the railroad tracks identified as the East P-Trap and West P-Trap (**Figure 2**). The data collected will be evaluated as follows:

- 1) Groundwater elevations will be evaluated to monitor for changes in groundwater elevations and/or flow directions as a result of the change in surface cover. If substantial changes occur, the monitoring well network may be adjusted, if deemed necessary.
- 2) The analytical results will be compared to the baseline concentrations and to the relevant Part 201 criteria.
 - a. If the concentration of a COC increases by 25% (from the baseline sample) and/or increases to exceed a relevant Part 201 criteria in two consecutive samples then additional downgradient well(s) will be identified and added to the monitoring network.
 - b. If the downgradient well shows an increasing trend and exceeds a relevant Part 201 criteria, then relevant pathways will be evaluated to assess if any risks are present and need to be addressed.
- 3) In the event that a significant increase in COC concentrations or new exceedances of Part 201 criteria are identified during slab removal/construction activities, quarterly sampling will continue for up to one year after installation of the cover is replaced over the restricted areas. However, if the concentrations of COC

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are stable or decreasing during slab removal/construction activities, then no monitoring will be continued following installation of the new surface cover.

- 4) Monitoring data will be tabulated and provided to EGLE on a quarterly basis and a summary of changes/trends will be provided in the Site's Semi-annual Progress Reports to EGLE (due April 15 and October 15).

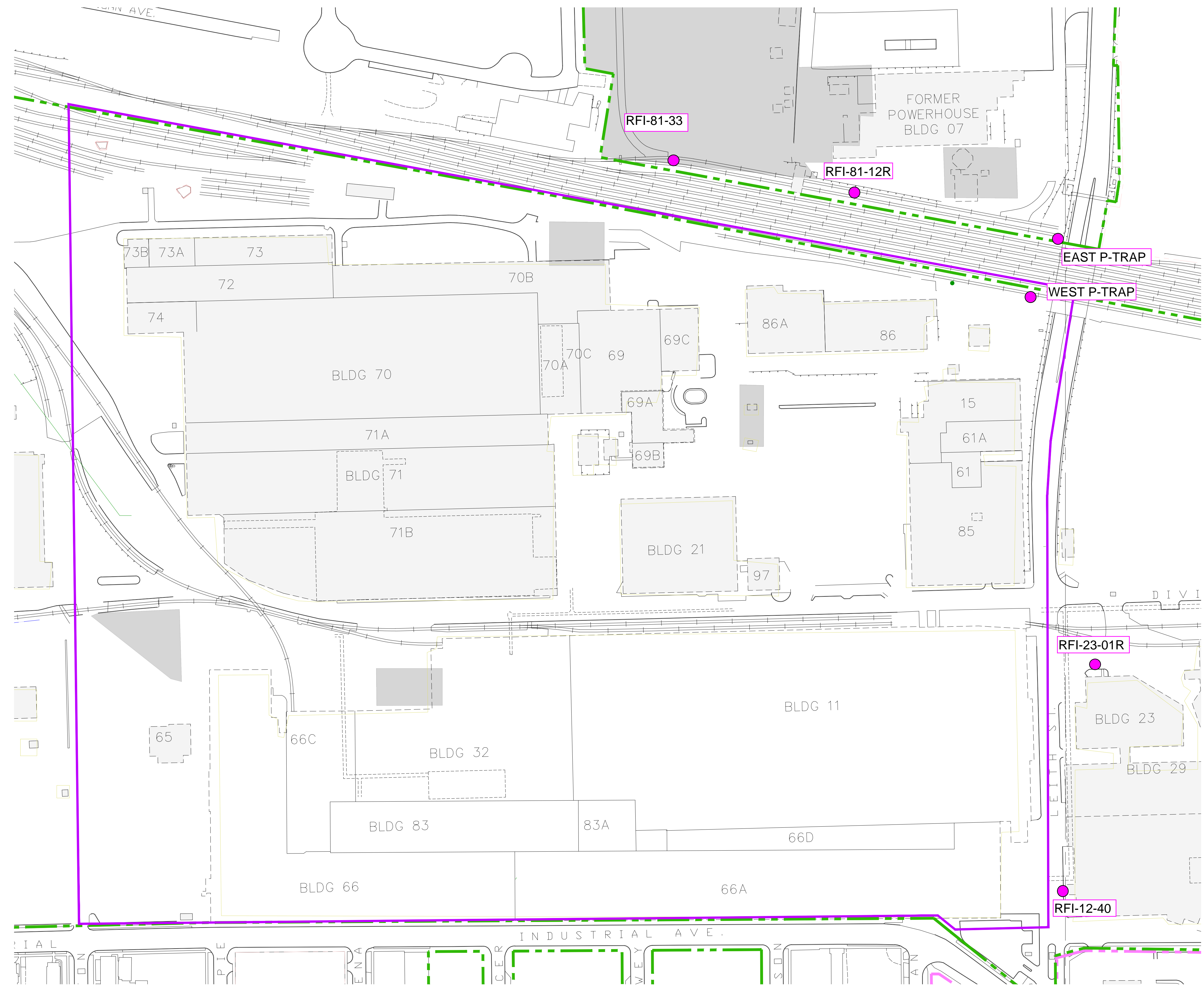
The locations for installation of new long-term monitoring wells will be selected following completion of the STCM. Monitoring well locations will be selected to monitor known impacts at restricted areas as well as impacts identified during the STCM (if any).

Attachments:




Figure 1 – 2023-2024 STCM Monitoring Locations

Figure 2 – Revised Short Term Construction Monitoring Locations


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LEGEND:

-  PROPERTY LINE
-  65 ACRE PARCEL
-  MONITORING WELLS USED FOR SHORT TERM CONSTRUCTION MONITORING



RACER TRUST BUICK CITY FLINT, MICHIGAN	
REVISED SHORT TERM CONSTRUCTION MONITORING LOCATIONS	
 ARCADIS	Design & Consultancy for natural and built assets
FIGURE 2	