

Our ref.: 12602792-LTR-24

February 6, 2026

Ms. Ashley Lesser
Michigan Department of Environment, Great Lakes & Energy
Remediation and Redevelopment Division - Jackson District Office
301 East Louis Glick Highway
Jackson, Michigan 49201-1556

**2026 Proposed Well Abandonment Update
Former Willow Run Powertrain Plant
Ypsilanti, Michigan**

Dear Ms. Lesser:

GHD Services Inc. (GHD) has prepared this letter on behalf of Revitalizing Auto Communities Environmental Response (RACER) Trust, as part of the ongoing Resource Conservation and Recovery Act (RCRA) Corrective Action (CA) at the Willow Run Powertrain site (Site) in Ypsilanti, Michigan, to submit a 2026 update to the proposed list of wells to abandon. This updated well abandonment plan will allow for current monitoring needs to be met while reducing the overall number of monitoring wells at the Site. Any prior well abandonment submittals should be disregarded.

Based on a Sitewide monitoring well inspection event completed in the fall of 2024 and proposed long-term monitoring goals at the Site, the proposed well abandonment plan has been updated for 2026. The attached Table 1 provides a list of the proposed abandonment plan. The table has been updated with the monitoring wells proposed to remain for the following reasons:

- Continued investigation or monitoring of per- and polyfluoroalkyl substances (PFAS) concentrations in groundwater near the property boundary, if needed by others.
- Proposed long-term monitoring including monitoring and evaluation of the PCE Area, perimeter monitoring well sampling, and Sitewide groundwater and light non aqueous phase liquid (LNAPL) elevation monitoring, as documented in the letter titled *Proposed Long-Term Monitoring Plan (GHD, February 2026)*.
- As of Fall 2024, nine monitoring well locations that were previously identified to remain were observed to be damaged beyond repair. These damaged monitoring wells are now proposed to be abandoned.

Figures 1 and 2 show the locations of the proposed wells for abandonment, as well as locations that are currently proposed to be maintained. The proposed monitoring wells to remain will allow for continued long-term monitoring, as documented in the *Proposed Long-Term Monitoring Plan*.

Table 1.1, below, summarizes the well counts based on the details from the Table 1, attached.

Table 1.1 **Well Count Summary**

Interval	Existing	Abandon	To Remain
Shallow Wells Sitewide	286	166	120
Intermediate Wells Sitewide	63	37	26
Deep Wells Sitewide	3	3	0
Total:	352	206	146

With EGLE concurrence, the proposed wells listed in Table 1 will be abandoned. All wells will be abandoned by pressure grouting the wells to ground surface and the surface restored to surrounding conditions, as detailed in the *2014 Remediation and Redevelopment Coordination Plan* between YAM and RACER.

Should you have any questions or require additional information regarding this submittal, please do not hesitate to contact Robbert Hare of RACER via e-mail at rhare@racertrust.org or by phone at +1 419 277-0815.

Regards,



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DB/jlf/LTR-24/S4



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Encl.: Table 1 - 2026 Monitoring Well Abandonment Update
 Figure 1 - Proposed Monitoring Well Abandonment
 Figure 2 - Monitoring Wells to Keep

Copy to: Clayton Joupperi, EGLE
 Chris Svoboda, EGLE
 Robert Hare, RACER
 Beth Landale, GHD

References

- GHD, November 2025. Proposed Long-Term Monitoring, Former Willow Run Powertrain Plant, Ypsilanti, Michigan.
- GHD, October 2024. PCE Area Interim Measures Report 2024, Former Willow Run Powertrain Plant, Ypsilanti, Michigan.
- GHD, May 2024. 2024 Well Abandonment Update, Former Willow Run Powertrain Plant, Ypsilanti, Michigan.

**2026 Monitoring Well Abandonment Update
Former Willow Run Powertrain Site
Ypsilanti, Michigan**

Monitoring Location ID	Groundwater Zone	Property	Long Term Monitoring - PCE Area Monitoring	Long Term Monitoring - Perimeter Monitoring	Long Term Monitoring - Sitewide GW/LNAPL Levels	PFAS Monitoring	Keep Well?
CRA-027R	Shallow	YAM			✓		Y
CRA-050M	Shallow	ACM			✓		Y
CRA-061M	Shallow	ACM	✓				Y
CRA-092M	Shallow	ACM				Y	Y
CRA-097M	Shallow	ACM				Y	Y
CRA-104M*	Shallow	ACM	✓				Y
CRA-105M*	Shallow	ACM	✓				Y
CRA-106M	Shallow	YAM	✓	✓	✓	Y	Y
CRA-107M	Shallow	YAM	✓			Y	Y
CRA-129M	Shallow	YAM				Y	Y
CRA-137M	Shallow	ACM	✓		✓		Y
CRA-140M	Shallow	ACM	✓	✓	✓	Y	Y
CRA-207M	Shallow	ACM				Y	Y
CRA-217M	Shallow	ACM			✓	Y	Y
CRA-219M	Shallow	ACM				Y	Y
CRA-222M	Shallow	ACM			✓		Y
CRA-223M	Shallow	ACM			✓		Y
CRA-224M	Shallow	YAM				Y	Y
CRA-239M	Shallow	YAM				Y	Y
CRA-267M	Shallow	ACM	✓		✓	Y	Y
CRA-310M*	Shallow	YAM	✓				Y
CRA-315I	Intermediate	YAM			✓		Y
CRA-315M	Shallow	YAM			✓	Y	Y
CRA-317I	Intermediate	ACM			✓		Y
CRA-320M	Shallow	ACM				Y	Y
CRA-321M	Shallow	WCAA			✓	Y	Y
CRA-322M	Shallow	ACM			✓		Y
CRA-342M	Shallow	WCAA			✓		Y
CRA-343I	Intermediate	WCAA			✓		Y
CRA-343M	Shallow	WCAA			✓	Y	Y
CRA-402R	Shallow	ACM				Y	Y
CRA-602M	Intermediate	ACM			✓		Y
CRA-604M	Shallow	ACM			✓		Y
CRA-605M	Intermediate	ACM			✓		Y
CRA-609M	Shallow	ACM	✓		✓	Y	Y
CRA-611M	Shallow	YAM				Y	Y
CRA-613M	Shallow	YAM				Y	Y
CRA-614M	Shallow	YAM				Y	Y
CRA-616M	Shallow	YAM			✓	Y	Y
CRA-623M	Shallow	ACM			✓		Y
CRA-701M	Shallow	ACM			✓		Y
CRA-703I	Intermediate	ACM			✓		Y
CRA-703M	Shallow	ACM			✓	Y	Y
CRA-704I	Intermediate	ACM			✓		Y
CRA-711I	Intermediate	ACM			✓		Y
CRA-713M	Shallow	ACM			✓		Y
CRA-720I	Intermediate	ACM			✓		Y
CRA-722M	Shallow	ACM			✓		Y
CRA-725I	Intermediate	ACM			✓		Y
CRA-725M	Shallow	ACM			✓		Y
CRA-729I	Intermediate	ACM		✓			Y
CRA-729M	Shallow	ACM		✓	✓		Y
CRA-736I	Intermediate	ACM			✓		Y
CRA-740I	Intermediate	ACM		✓	✓		Y
CRA-740M	Shallow	ACM		✓			Y
CRA-756M	Shallow	YAM	✓	✓	✓	Y	Y
CRA-757M*	Shallow	YAM	✓				Y
CRA-799M	Shallow	ACM			✓		Y
CRA-803M	Shallow	ACM				Y	Y
CRA-804M	Shallow	ACM				Y	Y

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Monitoring Location ID	Groundwater Zone	Property	Long Term Monitoring - PCE Area Monitoring	Long Term Monitoring - Perimeter Monitoring	Long Term Monitoring - Sitewide GW/LNAPL Levels	PFAS Monitoring	Keep Well?
CRA-805M	Shallow	YAM				Y	Y
CRA-806M	Shallow	YAM	✓		✓	Y	Y
CRA-807M	Shallow	ACM	✓		✓	Y	Y
CRA-827ML	Shallow	YAM		✓		Y	Y
CRA-837ML	Shallow	YAM		✓			Y
CRA-884M	Shallow	ACM			✓		Y
CRA-887I	Intermediate	ACM			✓		Y
CRA-887M	Shallow	ACM			✓		Y
CRA-889I	Intermediate	ACM			✓	Y	Y
CRA-889M	Shallow	ACM		✓	✓	Y	Y
CRA-890I(D)	Intermediate (Deep)	ACM		✓			Y
CRA-890I(S)	Intermediate	ACM			✓		Y
CRA-970M	Shallow	YAM			✓		Y
CRA-971M	Shallow	YAM			✓	Y	Y
CRA-972I	Intermediate	YAM			✓		Y
CRA-972M	Shallow	YAM				Y	Y
CRA-973M	Shallow	YAM				Y	Y
CRA-974M	Shallow	YAM				Y	Y
CRA-975M	Shallow	YAM				Y	Y
CRA-977M	Shallow	YAM			✓		Y
CRA-978M	Shallow	YAM				Y	Y
CRA-979M	Shallow	WCAA				Y	Y
CRA-980M	Shallow	WCAA				Y	Y
CRA-981M	Shallow	WCAA				Y	Y
CRA-982M	Shallow	WCAA				Y	Y
CRA-983M	Shallow	WCAA				Y	Y
GHD-1004M	Shallow	YAM				Y	Y
GHD-1005M	Shallow	YAM		✓		Y	Y
GHD-1006M	Shallow	YAM				Y	Y
GHD-1009M	Shallow	YAM			✓		Y
GHD-1016M	Shallow	ACM			✓		Y
GHD-1120I	Intermediate	ACM			✓		Y
GHD-1120M	Shallow	ACM			✓	Y	Y
GHD-1121IM(18)	Shallow	ACM			✓		Y
GHD-1121II(18)*	Intermediate	ACM			✓		Y
GHD-1122M	Shallow	ACM			✓		Y
GHD-1123I	Intermediate	ACM			✓		Y
GHD-1123M	Shallow	ACM			✓		Y
GHD-1125M	Shallow	ACM			✓		Y
GHD-1134M	Shallow	ACM	✓				Y
GHD-1145M	Shallow	ACM	✓				Y
GHD-1151M	Shallow	ACM	✓				Y
GHD-1196I	Intermediate	ACM		✓	✓		Y
GHD-1196M	Shallow	ACM			✓		Y
GHD-1197M	Shallow	ACM			✓		Y
GHD-1198M	Shallow	ACM			✓		Y
GHD-1209M	Shallow	YAM	✓		✓		Y
GHD-1210M	Shallow	YAM	✓	✓		Y	Y
GHD-1211M	Shallow	YAM			✓	Y	Y
GHD-1212M	Shallow	YAM			✓		Y
GHD-1213M	Shallow	YAM			✓		Y
GHD-1214M	Shallow	YAM			✓	Y	Y
GHD-1220M	Shallow	ACM	✓		✓		Y
GHD-1223M	Shallow	ACM	✓		✓	Y	Y
GHD-1226M	Shallow	ACM	✓	✓		Y	Y
GHD-1229M	Shallow	YAM	✓			Y	Y
GHD-1232I	Intermediate	ACM				Y	Y
GHD-1232M	Shallow	ACM	✓			Y	Y
GHD-1233I	Intermediate	ACM				Y	Y
GHD-1233M	Shallow	ACM	✓			Y	Y

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GHD-1234M	Shallow	ACM	✓			Y	Y
GHD-1235M	Shallow	WCAA				Y	Y
GHD-1236M	Shallow	WCAA			✓	Y	Y
GHD-1237M	Shallow	WCAA			✓	Y	Y
GHD-1238M	Shallow	WCAA			✓	Y	Y
GHD-1239M	Shallow	WCAA			✓	Y	Y
GHD-1240M	Shallow	WCAA			✓	Y	Y
GHD-1241M	Shallow	WCAA			✓	Y	Y
GHD-1242M	Shallow	WCAA			✓	Y	Y
GHD-1243M	Shallow	WCAA	✓		✓	Y	Y
GHD-1244M	Shallow	WCAA	✓		✓	Y	Y
GHD-604I	Intermediate	ACM			✓		Y
GHD-859M	Shallow	ACM	✓				Y
GHD-984M	Shallow	ACM			✓		Y
GHD-986M	Shallow	YAM			✓	Y	Y
GHD-988M	Shallow	ACM				Y	Y
GHD-999M	Shallow	YAM				Y	Y
IG-1	Shallow	ACM	✓			Y	Y
IG-2	Shallow	ACM	✓	✓		Y	Y
MW-101	Shallow	WCAA				Y	Y
MW-103	Shallow	WCAA				Y	Y
MW-6	Shallow	WCAA	✓		✓	Y	Y
MW-9	Shallow	WCAA	✓		✓	Y	Y
WCAA-MW09-2017	Shallow	WCAA				Y	Y
WCAA-MW14-2017	Shallow	WCAA	✓			Y	Y
CRA-001M	Shallow	ACM					N
CRA-001R	Shallow	ACM					N
CRA-003R	Shallow	ACM					N
CRA-004R	Shallow	ACM					N
CRA-005RA	Shallow	ACM					N
CRA-005RB	Shallow	ACM					N
CRA-006R	Shallow	ACM					N
CRA-009R	Shallow	ACM					N
CRA-015M	Shallow	ACM					N
CRA-017R	Shallow	ACM					N
CRA-032R	Unk (I assumed)	YAM					N
CRA-033R	Unk (I assumed)	YAM					N
CRA-041R	Shallow	YAM					N
CRA-043R	Unk (S assumed)	ACM					N
CRA-052M	Intermediate	ACM					N
CRA-053M	Shallow	ACM					N
CRA-082I	Intermediate	ACM					N
CRA-082M	Shallow	ACM					N
CRA-084M	Shallow	ACM					N
CRA-086M-A	Shallow	ACM					N
CRA-086M-B	Shallow	ACM					N
CRA-089M	Shallow	ACM					N
CRA-089R	Shallow	ACM					N
CRA-090M	Shallow	ACM					N
CRA-091M	Shallow	ACM					N
CRA-094M	Shallow	YAM					N
CRA-096M	Shallow	ACM					N
CRA-098M	Shallow	ACM					N
CRA-100M	Shallow	ACM					N
CRA-101M	Shallow	ACM					N
CRA-102M	Shallow	ACM					N
CRA-103M	Shallow	ACM					N
CRA-104I	Intermediate	ACM					N
CRA-108M	Shallow	ACM					N
CRA-109M	Shallow	ACM					N

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Monitoring Location ID	Groundwater Zone	Property	Long Term Monitoring - PCE Area Monitoring	Long Term Monitoring - Perimeter Monitoring	Long Term Monitoring - Sitewide GW/LNAPL Levels	PFAS Monitoring	Keep Well?
CRA-110M	Shallow	ACM					N
CRA-113M	Shallow	YAM					N
CRA-120M-A	Shallow	ACM					N
CRA-120M-B	Shallow	ACM					N
CRA-121M-A	Shallow	ACM					N
CRA-121M-B	Shallow	ACM					N
CRA-122M-A	Shallow	YAM					N
CRA-122M-B	Shallow	YAM					N
CRA-124M**	Shallow	YAM					N
CRA-125M	Shallow	YAM					N
CRA-128M	Shallow	YAM					N
CRA-133M**	Shallow	YAM					N
CRA-204M-A	Shallow	ACM					N
CRA-204M-B	Shallow	ACM					N
CRA-205M-A	Shallow	ACM					N
CRA-205M-B	Shallow	ACM					N
CRA-206M	Shallow	ACM					N
CRA-208M-A	Shallow	ACM					N
CRA-208M-B	Shallow	ACM					N
CRA-214M-A**	Shallow	ACM					N
CRA-214M-B**	Shallow	ACM					N
CRA-215M-A	Shallow	ACM					N
CRA-215M-B	Shallow	ACM					N
CRA-216M-A	Shallow	ACM					N
CRA-216M-B	Shallow	ACM					N
CRA-218M-A**	Shallow	ACM					N
CRA-218M-B**	Shallow	ACM					N
CRA-220M-A	Shallow	ACM					N
CRA-220M-B	Shallow	ACM					N
CRA-225M**	Shallow	YAM					N
CRA-228M	Shallow	YAM					N
CRA-253M	Shallow	ACM					N
CRA-260M	Shallow	ACM					N
CRA-261M	Shallow	ACM					N
CRA-263M	Unk (S assumed)	YAM					N
CRA-264M	Shallow	ACM					N
CRA-265M	Shallow	WCAA					N
CRA-266M	Shallow	ACM					N
CRA-273M	Unk (S assumed)	YAM					N
CRA-276M	Shallow	ACM					N
CRA-282M	Shallow	YAM					N
CRA-304M	Shallow	ACM					N
CRA-309M	Shallow	ACM					N
CRA-311M	Shallow	YAM					N
CRA-312M	Shallow	ACM					N
CRA-313M	Shallow	ACM					N
CRA-317M	Shallow	ACM					N
CRA-318M	Shallow	ACM					N
CRA-322I	Intermediate	ACM					N
CRA-327M	Shallow	ACM					N
CRA-401M-D	Intermediate	ACM					N
CRA-401R	Shallow	ACM					N
CRA-402M-S	Shallow	ACM					N
CRA-403R	Shallow	ACM					N
CRA-405M-S	Shallow	ACM					N
CRA-501R	Shallow	ACM					N
CRA-502R	Shallow	ACM					N
CRA-503R	Shallow	ACM					N
CRA-504R	Shallow	ACM					N
CRA-505R	Shallow	ACM					N

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Monitoring Location ID	Groundwater Zone	Property	Long Term Monitoring - PCE Area Monitoring	Long Term Monitoring - Perimeter Monitoring	Long Term Monitoring - Sitewide GW/LNAPL Levels	PFAS Monitoring	Keep Well?
CRA-506R	Shallow	ACM					N
CRA-507R	Shallow	ACM					N
CRA-508R	Shallow	ACM					N
CRA-509R	Shallow	ACM					N
CRA-510R	Shallow	ACM					N
CRA-511R	Shallow	ACM					N
CRA-512R	Shallow	ACM					N
CRA-513R	Shallow	YAM					N
CRA-515R	Shallow	YAM					N
CRA-516R	Shallow	YAM					N
CRA-517R	Shallow	YAM					N
CRA-518R	Shallow	YAM					N
CRA-519R	Shallow	YAM					N
CRA-520R	Shallow	YAM					N
CRA-521R	Shallow	YAM					N
CRA-522R	Shallow	YAM					N
CRA-523R	Shallow	YAM					N
CRA-524R	Shallow	YAM					N
CRA-525M	Shallow	ACM					N
CRA-526M	Shallow	ACM					N
CRA-527M	Shallow	ACM					N
CRA-528M	Shallow	ACM					N
CRA-529M	Shallow	ACM					N
CRA-533M	Shallow	ACM					N
CRA-534M	Shallow	ACM					N
CRA-608M	Shallow	ACM					N
CRA-612M**	Shallow	YAM					N
CRA-615M**	Shallow	YAM					N
CRA-617M**	Shallow	WCAA					N
CRA-704D	Deep	ACM					N
CRA-704M	Shallow	ACM					N
CRA-705M	Shallow	ACM					N
CRA-706M	Shallow	ACM					N
CRA-709M	Shallow	WCAA					N
CRA-710M	Shallow	ACM					N
CRA-724I	Intermediate	ACM					N
CRA-726D	Deep	ACM					N
CRA-726I	Intermediate	ACM					N
CRA-726M	Shallow	ACM					N
CRA-731I	Intermediate	ACM					N
CRA-735I**	Intermediate	ACM					N
CRA-784I	Intermediate	ACM					N
CRA-785D	Deep	YAM					N
CRA-785I	Intermediate	YAM					N
CRA-787I	Intermediate	ACM					N
CRA-789M	Shallow	ACM					N
CRA-791M	Shallow	ACM					N
CRA-804I	Intermediate	ACM					N
CRA-828M	Shallow	WCAA					N
CRA-829M	Shallow	WCAA					N
CRA-833M	Shallow	ACM					N
CRA-834M	Shallow	WCAA					N
CRA-858I**	Intermediate	ACM					N
CRA-888I	Intermediate	ACM					N
CRA-888M	Shallow	ACM					N
CRA-890M	Shallow	ACM					N
CRA-947I	Intermediate	YCUA					N
CRA-948I(D)	Intermediate (Deep)	YCUA					N
CRA-948I(S)	Intermediate	YCUA					N
CRA-948M	Shallow	YCUA					N

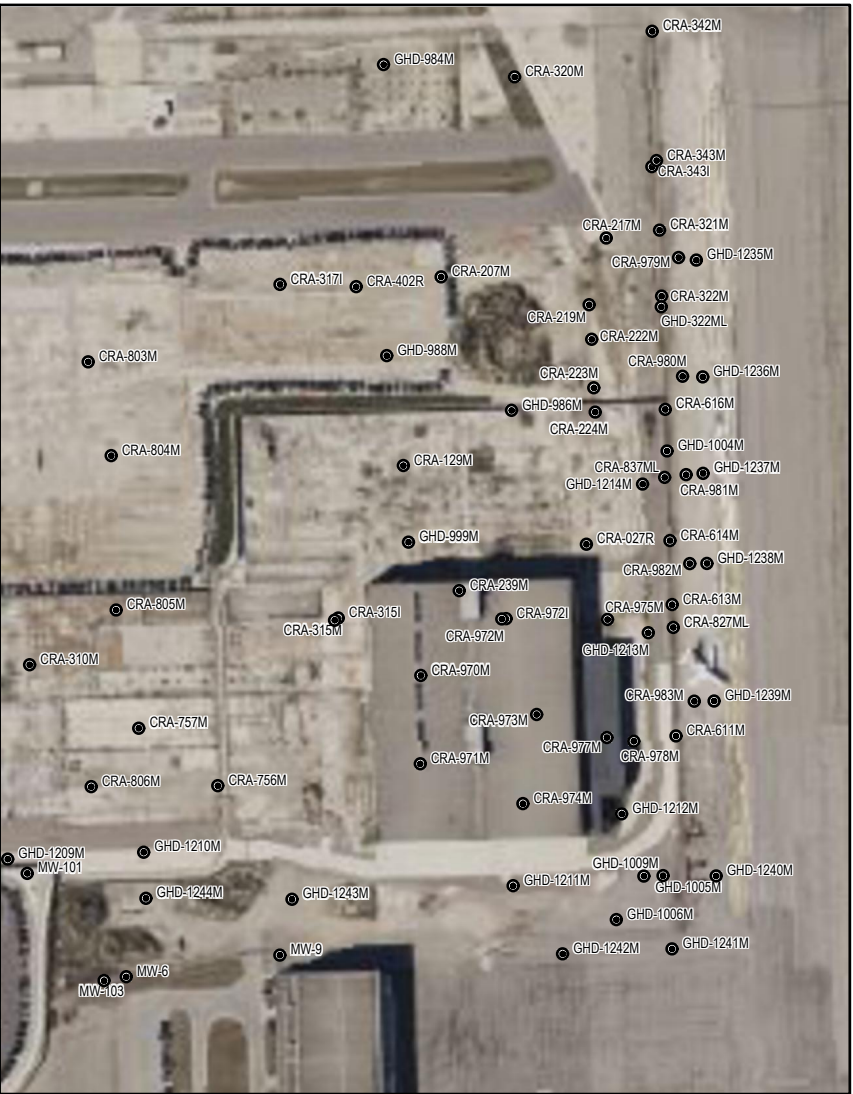
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Monitoring Location ID	Groundwater Zone	Property	Long Term Monitoring - PCE Area Monitoring	Long Term Monitoring - Perimeter Monitoring	Long Term Monitoring - Situwide GW/LNAPL Levels	PFAS Monitoring	Keep Well?
CRA-949I	Intermediate	YCUA					N
CRA-949M	Shallow	YCUA					N
CRA-950I(D)R	Intermediate (Deep)	YCUA					N
CRA-950I(S)	Intermediate	YCUA					N
CRA-951I	Intermediate	YCUA					N
CRA-951M	Shallow	YCUA					N
CRA-952M	Shallow	YCUA					N
CRA-953I	Intermediate	YCUA					N
CRA-954I(D)	Intermediate (Deep)	YCUA					N
CRA-954I(S)	Intermediate	YCUA					N
CRA-961M	Shallow	ACM					N
CRA-962M**	Shallow	ACM					N
CRA-969M	Shallow	YAM					N
CRA-976M**	Shallow	YAM					N
GHD-1001M	Shallow	ACM					N
GHD-1013M	Shallow	ACM					N
GHD-1014M	Shallow	ACM					N
GHD-1015M	Shallow	ACM					N
GHD-1017M	Shallow	ACM					N
GHD-1018M	Shallow	ACM					N
GHD-1029I	Intermediate	ACM					N
GHD-1122I	Intermediate	ACM					N
GHD-1124I	Intermediate	ACM					N
GHD-1124M	Shallow	ACM					N
GHD-1125I	Intermediate	ACM					N
GHD-1126I	Intermediate	ACM					N
GHD-1126M	Shallow	ACM					N
GHD-1127I	Intermediate	ACM					N
GHD-1127M	Shallow	ACM					N
GHD-1199I	Intermediate	ACM					N
GHD-1215M**	Shallow	ACM					N
GHD-1234I	Intermediate	ACM					N
GHD-322ML**	Shallow	ACM					N
GHD-989M	Shallow	ACM					N
GHD-990M	Shallow	ACM					N
GHD-991M	Shallow	ACM					N
GHD-992M	Shallow	ACM					N
GHD-993M	Shallow	ACM					N
GHD-995M	Shallow	ACM					N
GHD-996M	Shallow	YAM					N
GHD-997M	Shallow	YAM					N
GHD-998M	Shallow	YAM					N
LMW-1	Shallow	ACM					N
LMW-2	Shallow	ACM					N
LMW-3	Shallow	ACM					N
MW-104	Shallow	WCAA					N
WCAA-MW16-2017	Shallow	WCAA					N
WCAA-MW18-2017	Shallow	WCAA					N
WCAA-MW20-2017	Shallow	WCAA					N
YCUA-MW1	Intermediate	YCUA					N
YCUA-MW3	Intermediate	YCUA					N
YCUA-MW4	Intermediate	YCUA					N

Notes:

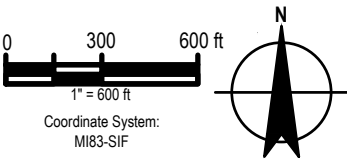
*Monitoring well locations that were proposed to be abandoned in 2024 but are proposed to remain now as part of long-term monitoring network.

**Monitoring wells that were proposed to remain in 2024 but are now proposed to be abandoned.



DETAIL

LEGEND
● MONITORING WELLS TO KEEP



FORMER WILLOW RUN POWERTRAIN
YPSILANTI, MICHIGAN

MONITORING WELLS TO KEEP

Project No. 12602792
Date February 2026

FIGURE 2