



**CONESTOGA-ROVERS
& ASSOCIATES**

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May 17, 2013

Reference No. 012636-T09

Mr. Richard Conforti
Hazardous Waste Section, Resource Management Division
Michigan Department of Environmental Quality
525 W. Allegan (Constitution Hall)
Lansing, Michigan
U.S.A. 48933

Dear Mr. Conforti:

Re: Response to MDEQ Comments Dated April 23, 2013
Groundwater Quality Analysis
Former Peregrine (US) Inc. (Peregrine) Coldwater Road Facility
Genesee Township, Michigan

On behalf of Revitalizing Auto Communities Environmental Response Trust (RACER), the following presents responses to the Michigan Department of Environmental Quality (MDEQ) comments and questions received by letter dated April 23, 2013 regarding the Groundwater Quality Analysis dated February 1, 2013 for the recent groundwater investigation conducted at the former Peregrine Coldwater Road Industrial Land (Site) located at 1245E Coldwater Road in Genesee Township, near Flint, Michigan.

For ease of review, the original comment is presented in *bold italics*, followed by a response.

MDEQ Comment #1

General Comment: Although the Report is entitled "Groundwater Quality", the Report documents only the groundwater investigation conducted over the past two years focusing on inorganics and potential off-site migration of contaminated groundwater. Previous investigations, which include data on organic compounds, have been performed over the past 15 years at the facility. At some point in the corrective action process, a comprehensive federal Resource Conservation and Recovery Act of 1976, as amended (RCRA), Facility Investigation (RFI) Report must be submitted that integrates the various groundwater and soil investigations, as well as the interim measures already completed, so that appropriate defensible, and final corrective measures can be proposed and to facilitate public involvement.



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Response

It was our understanding that the MDEQ reviewed the August 2010 RFI Report and identified data gaps in the groundwater investigation and we have been stepping through additional groundwater investigation activities over the past two years to address those gaps. The additional work was to demonstrate whether a connection exists between the perched and drift aquifers and in addition, complete routine groundwater monitoring to allow site-specific background groundwater concentrations to be developed. We viewed this additional investigation as supplemental RFI work and the reports submitted to document the work as supplemental reports to the RFI. We would hope to not have to revise the existing RFI Report but be able to use subsequent reports as supplements. Our perspective is that when the data gap was filled a Corrective Measures Study and Proposal would be prepared to develop, evaluate and propose final corrective measures for the Site. To that end the proposed grouting of the backfill in the sewer corridor was intended as an interim measure. We are certainly open to discussing how best to proceed.

With respect to public involvement, we are in the process of identifying an appropriate public information repository for site documents. In addition RACER is certainly open to organizing a public information session or other appropriate public involvement effort. Just within the last few days RACER has been discussing and is in the process of coordinating a public information session for all RACER sites in Genesee County. We should discuss.

MDEQ Comment #2

Section 5.1, Shallow Groundwater Results: Two shallow wells at the northwest edge of the property, OBG MW-9 and OBG MW-10, exceed Part 201 generic residential and non-residential drinking water criteria for a variety of inorganics and, while they are proposed for monitoring, the extent of any off-site exceedances has not yet been delineated. RACER Trust must complete the delineation of off-site impacts in the area, either by determining the extent of contaminant concentrations above background levels, determining areal limits of the perched groundwater formation(s) in which these wells are set, or both.

Response

Samples collected at OBG MW-9 and OBG MW-10 have only been analyzed for Total and Dissolved Manganese as Manganese was the constituent of concern for the investigation in relation to which they were installed.



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Both dissolved manganese samples from OBG MW-9 (0.57 milligrams per Litre (mg/L) and 0.562 mg/L) marginally exceeded the approved Site-Specific background concentration for dissolved manganese (0.547 mg/L). It is believed that dissolved manganese concentrations observed at OBG MW-9 are representative Site-Specific background. Additional monitoring at OBG MW-9 will be used to confirm previous sampling methods and stability of dissolved manganese concentrations at this location.

Additional monitoring should also be completed at OBG MW-10 to confirm the results of the two groundwater samples previously collected. OBG MW-10 is located at the property boundary, separated from the historic Site operations by a large parking lot. Additionally, OBG MW-10 exhibits the highest dissolved manganese concentration observed on-Site, yet based on stratigraphic logs of on-Site boreholes in the vicinity of OBG MW-10, the on-Site extent of the shallow water bearing unit in the area around OBG MW-10 can be delineated from the historic operations at the Site as presented in Figure 1.

In order to further delineate the extent of perched groundwater zone in the area around OBG MW-9 and OBG MW-10, RACER proposes to complete both on-Site and off-Site soil borings to a maximum depth of 20 feet below ground surface or until groundwater is encountered, and collect borehole water samples (if groundwater is present). Samples will be analyzed for dissolved lead and dissolved manganese. The approximate locations of the proposed boreholes are presented on Figure 1; additional borings may be completed depending on the presence of water at the proposed locations. RACER will obtain appropriate approvals prior to drilling in the road right away. Note that a budget amendment will be necessary to implement this proposed work.

MDEQ Comment #3

Section 7.0, Recommendations: Groundwater monitoring at the site boundary is only proposed to be conducted through 2014. The OWMRP has traditionally required three years of monitoring to demonstrate that groundwater contamination is not migrating off site, particularly in cases where source material is proposed to be left onsite. This is a particular concern at the two monitoring wells listed in Comment 2, above. The proposed monitoring program should be extended to a minimum of three years after the issues raised in Comment 2, above, are addressed.



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Response

RACER is not opposed to conducting additional monitoring events should they be required. The detail of the monitoring event should be discussed following the completion of the activities proposed in the Response to MDEQ Comment #2.

MDEQ Comment #4

Section 7.0, Recommendations: The OWMRP does not support the proposed decommissioning of monitoring wells at this time. It is our recommendation that the decision as to which monitoring wells to decommission be made following the activities described in Comments 1 through 3, above.

Response

The purpose of the abandonments is to prevent any potential tampering or unintentional damage; monitoring wells will not be abandoned without MDEQ consent.

MDEQ Comment #5

Section 7.0, Recommendations: The proposal to grout the bedding material for the storm sewers to prevent off site migration of contaminated groundwater may be premature. Given the fact that much of the slab at the site has been removed, likely resulting in changes to the hydrogeological dynamics at the site, and the fact that such grouting could result in groundwater finding alternative pathways off site, the OWMRP would like to reassess this proposal in light of a comprehensive review of site conditions presented in the RFI discussed in Comment 1, above.

Response

The proposed grouting is intended as an interim measure to prevent the migration of contaminants on- or off-Site since certain compounds detected in the bedding materials do not appear in the on-Site shallow water bearing unit samples. Furthermore, the sample results for the stormwater sample, collected from the sewer in the vicinity of BH-112, were below Site-specific background and/or Part 201 screening criteria for all general chemistry, VOCs, and total/dissolved metals.



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As the building/slab decommissioning and demolition were completed in 2001 the recent investigations are believed to be representative of current Site conditions.

Please let us know if you would like to schedule a meeting or call to discuss.

Should you have any questions on the above, please do not hesitate to contact David Favero with RACER or the undersigned.

Yours truly,

CONESTOGA-ROVERS & ASSOCIATES

Michael R. Tomka, P.E.

RC/kf/15

Encl.

cc: David Favero/Grant Trigger, RACER Trust (PDF)
Jack Schinderle/John McCabe/Joe Rogers, MDEQ
William Yocum, MDEQ



LEGEND

- FACILITY BOUNDARY
- STM STORM SEWER LINE
- SAN SANITARY SEWER LINE
- M.H. ○ MANHOLE
- BOREHOLE LOCATION
- MONITORING WELL LOCATION
- ⊗ ABANDONED/TEMPORARY MONITORING WELL LOCATION
- * GROUNDWATER PRESENT AND SAMPLED
- ⊠ PROPOSED BOREHOLE LOCATION (MAX. 20ft DEEP)

figure 1

PRESENCE/ABSENCE OF SUBSURFACE WATER IN VICINITY OF OBG MW-10
 FORMER PEREGRINE (US), INC. COLDWATER ROAD FACILITY
Genesee Township, Michigan

NOTES:
 THIS DRAWING IS FOR REFERENCE ONLY AND IS NEITHER
 COMPLETE NOR TO EXACTING SCALE.
 AERIAL PHOTO DATED MARCH 25, 2000.