



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING



DAN WYANT
DIRECTOR

April 13, 2012

Ms. Amy L. Hoeksma
Vice President/Operations Leader
ARCADIS U.S., Inc.
10559 Citation Drive, Suite 100
Brighton, Michigan 48116

Dear Ms. Hoeksma:

SUBJECT: Phase II RCRA Facility Investigation Work Plan (RFI Work Plan); RACER Trust Plants 2 & 3; MID 980 700 827; Plant 6; MID 005 356 928

The Michigan Department of Environmental Quality (MDEQ) has reviewed the RFI Work Plan that was received electronically on March 16, 2012, pursuant to Part 111, Hazardous Waste Management, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended.

Based on that review, RMD staff has the following comments:

1. Section 2.1.2.5, Soil and Groundwater Impacts; Metals:

- a. Existing data must be evaluated to determine if the presence of the site-wide manganese impacts in soil and groundwater is related to the fill material present on site or is naturally occurring as stated. If necessary, the RFI Work Plan should be modified to provide for additional data collection as part of the Phase 2 Investigation to assist in this evaluation.
- b. In the MDEQ review of the Phase 1 Activities Summary Report for the site, it was noted that the generic residential Part 201 particulate soil inhalation criteria (PSIC) was used for comparison to site data. The RFI Work Plan must be modified to evaluate the Phase 1 data with a PSIC calculated based on a larger source size (Plant 2 and 6 entire combined, and Plant 3 entire) as previously agreed upon with the MDEQ. In addition, the nonresidential PSIC should be used for comparison to site data if it is more restrictive than the residential criteria (e.g., manganese) unless it is known that the site end-use will be residential.
- c. The Phase 1 investigation determined that Area of Interest 3-51 required further action on the basis of soil metals exceedences of various Part 201 criteria. The RFI Work Plan does not propose any further investigation or delineation in this area. The RFI Work Plan must be revised to include discussion as to proposed future activities in this area.

2. Section 3.1, Data Quality Objectives (DQO) Summary:

Objective #1 in the table in Section 3.1 states that the DQO for the bedrock groundwater investigation (i.e., installation and sampling of the four new bedrock monitoring wells) is a fixed, delineation level investigation. This is not consistent with the MDEQ's understanding of the bedrock investigation as discussed with ARCADIS via telephone on March 9; at that time, it was represented that the installation and sampling of the four new bedrock monitoring wells was meant to determine if there was certain and obvious contamination in the bedrock that would require immediate attention, and that it was not meant to be used a

documentation that no impacts to bedrock groundwater exist (i.e., delineation). The RFI Work Plan must be revised to clarify this issue.

3. Section 3.4, Drilling Methods:

The RFI Work Plan must be modified to describe the procedures that will be implemented to grout/seal boreholes after completions. In order to insure a good seal and minimize the potential for downhole migration of contamination, for deep boreholes (i.e., > 15'); installation using a tremmie pipe is recommended.

4. Section 4.4, Sampling Frequency for Groundwater:

- a. The RFI Work Plan must be modified to specify the use of bladder or reciprocating pumps for groundwater sample collection at all depths. Use of a peristaltic pump is not recommended for VOC/SVOC sampling.
- b. The RFI Work Plan must also be modified to clarify the collection and analytical methods to be used for saturated soils.

5. Section 4.6, Calibration of Field-Screening Approaches:


The RFI Work Plan must be modified to address how the field screening approaches will be modified if the calibration results do not confirm they will be appropriate for use at the site.

6. Section 6, Communication Plan:

The RFI Work Plan must be modified to provide additional discussion regarding how information from the different phases on the RFI will be summarized and presented to the MDEQ. It is anticipated that some type of interim summary report will need to be developed, since an informal presentation at a milestone meeting would not likely be sufficient to present the detailed information necessary for decision-making and additional planning.

Should you have questions or require further information, please contact me at 517-373-7397; quackenbushp@michigan.gov; or MDEQ, P.O. Box 30241, Lansing, Michigan 48909-7741.

Sincerely,



Peter Quackenbush
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Hazardous Waste Section
Resource Management Division
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cc: Mr. Dave Favero, RACER Trust
Mr. Scott Clearwater, ARCADIS U.S., Inc.
Mr. Joe Cisnero, U.S. Environmental Protection Agency, Region 5
Mr. Joe Rogers/John McCabe, MDEQ
Corrective Action File