



July 31, 2015

Reference No. 012607
Distributed via E mail

Mr. Greg Rudloff
U.S. Environmental Protection Agency, Region 5
Land and Chemicals Division
77 West Jackson Blvd., LU 9J
Chicago, Illinois 60604 3590

Dear Mr. Rudloff:

**Re: Request to Abandon Monitoring Wells
Performance Based Administrative Order on Consent
Docket Number RCRA 05 2011 0025
13000 Eckles Road Site, Livonia, Michigan
USEPA ID No. MID 005 356 621**

This letter has been prepared to request approval to abandon and remove eleven on-site groundwater elevation monitoring wells from the Revised Groundwater Monitoring Plan (CRA, April 2008) (GMP) program to support the redevelopment of the Revitalizing Auto Communities Environmental Response Trust (RACER) 13000 Eckles Road Site located in Livonia, Michigan (Site). Three additional monitoring wells not included in the GMP are also proposed for abandonment. Grading, soil filling, and concrete slab-related activities were conducted in 2014 and additional redevelopment activities are being coordinated. A new Declaration of Restrictive Covenant (DRC) is being prepared for a portion of the Site and the abandonment of the fourteen monitoring wells, and removal of ongoing monitoring obligations from the existing GMP will facilitate redevelopment of the Site. The eleven GMP monitoring wells are included in the GMP for monitoring groundwater elevations annually. Seven of the GMP monitoring wells were also monitored for the presence of light nonaqueous phase liquid (LNAPL) quarterly.

Groundwater elevations have fluctuated from year to year since the GMP was implemented, however, the groundwater elevation contours and flow direction trends have remained consistent and the monitoring wells are no longer believed to be necessary to confirm groundwater flow directions. The monitoring wells proposed for abandonment are listed below and presented on the attached Exhibit C from a Remediation and Redevelopment Coordination Plan.

The water levels in the monitoring wells associated with the AOI 21 LNAPL monitoring wells have also fluctuated seasonally, and annually, however, there has been a downward trend in the presence and amount of LNAPL in AOI 21 monitoring wells. There has not been LNAPL present in the majority of monitoring wells for the entirety of the program. There has been no measurable LNAPL in any of the monitoring wells during the last two monitoring events. RACER proposes that the ongoing monitoring of the limited amounts of LNAPL is no longer necessary and the general AOI 21 area will be identified in the new DRC to prevent exacerbation by future land owners. The AOI 21 monitoring wells

proposed for abandonment are listed below and presented on figure 1, along with the measured LNAPL thickness shown from 2005 through 2015.

The monitoring wells presented in the GMP for groundwater sampling and analysis will continue to be sampled until the United States Environmental Protection Agency (U.S. EPA) agrees that the monitoring program is no longer required. Upon approval of this request by U.S. EPA, RACER will update the GMP to reflect the approved changes to the Groundwater Monitoring Plan.

Site-Wide GMP GW Elevation Monitoring Wells Proposed for Abandonment

MW-33-7S

MW-33-9S

MW-S-10S

MW-S-4S

AOI 21 LNAPL Monitoring Wells Proposed for Abandonment

MW-A1-16S

MW-21-1S

MW-21-2S

MW-21-3S

MW-21-4S

MW-21-5S

MW-21-6S

Site-Wide Non-GMP Monitoring Wells Proposed for Abandonment

MW-24-1S

MW-24-2S

MW-A2-2S

The monitoring wells will be abandoned by grouting the interior of the well and removing all well materials (including protective casing) within the top 3 feet of ground surface.

Please contact Grant Trigger or myself if you require additional information or if you would like to discuss further. Thank you.

Sincerely,

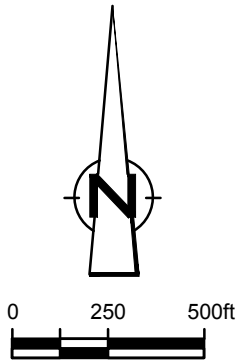
GHD



Christopher J. Meincke, P.E.

CJM/16/Det.

cc: Grant Trigger, RACER
Dave Favero, RACER

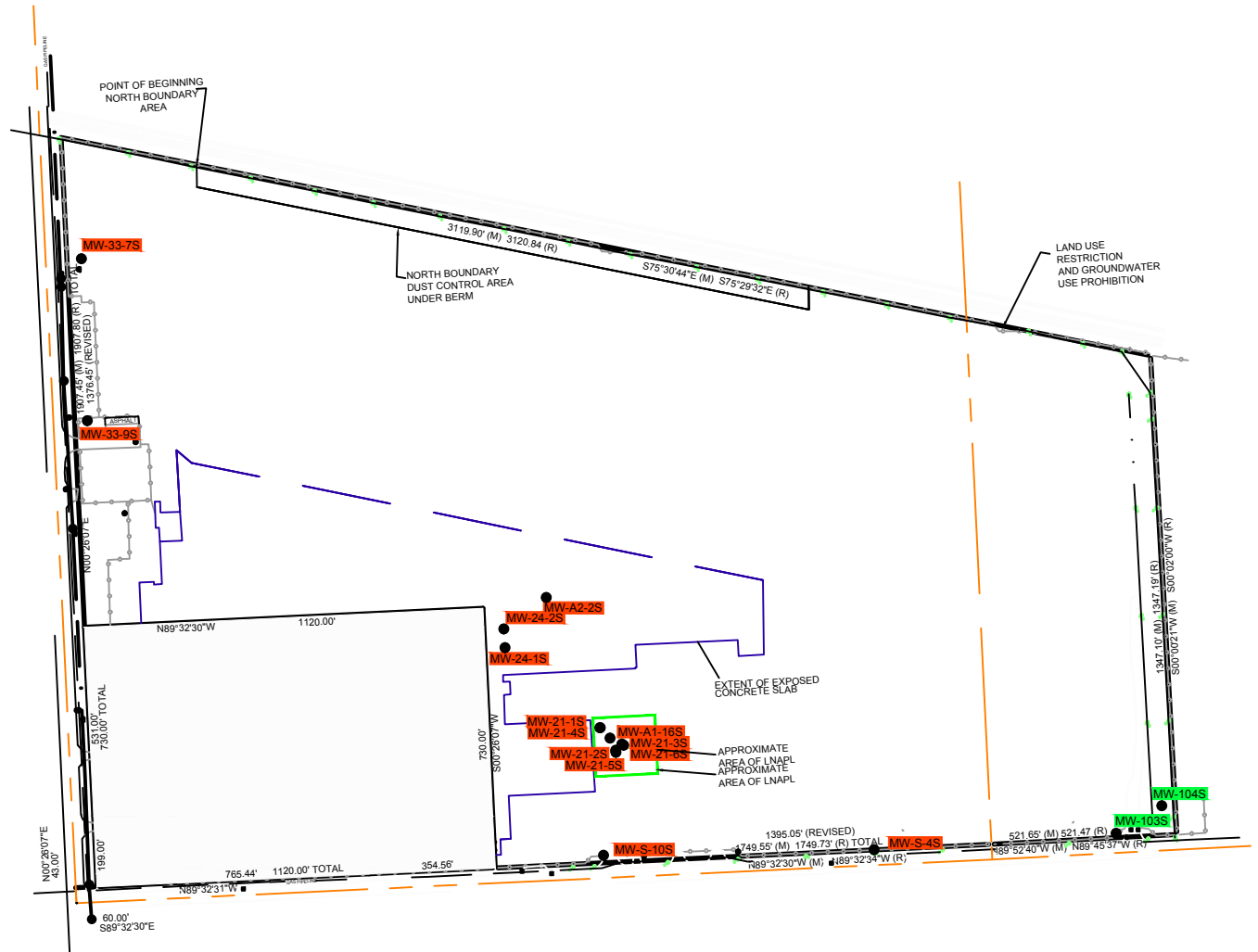


MW	X	Y
MW-103S	13379094.3500	320184.3600
MW-104S	13379222.5400	320261.7800
MW-21-1S	13377644.8743	320480.4403
MW-21-2S	13377688.8800	320417.2100
MW-21-3S	13377706.7300	320434.3700
MW-21-4S	13377645.1500	320480.6200
MW-21-5S	13377689.4400	320411.3900
MW-21-6S	13377710.9700	320431.5200
MW-33-7S	13376188.5600	321797.9800
MW-33-9S	13376204.7962	321343.1362
MW-A1-16S	13377673.1915	320451.4311

MICHIGAN STATE PLANE COORDINATES
SOUTH ZONE

LEGEND

- FENCE
- APPROXIMATE PROPERTY BOUNDARY
- EXTENT OF EXISTING EXPOSED SLAB
- APPROXIMATE AREA OF LNAPL
- NORTH BOUNDARY DUST CONTROL AREA
- EXISTING MONITORING WELL PROPOSED FOR ABANDONMENT
- EXISTING MONITORING WELL TO BE MAINTAINED



MONITORING WELLS TO BE MAINTAINED AND ABANDONED REMEDATION AND REDEVELOPMENT COORDINATION PLAN

13000 ECKLES ROAD SITE

Livonia, Michigan

Exhibit C

