



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING



DAN WYANT
DIRECTOR

December 6, 2013

Received

DEC 16 2013

O'Brien & Gere

Mr. David Favero
RACER Trust
500 Woodward Avenue, Suite 1510
Detroit, Michigan 48226

Dear Mr. Favero:

SUBJECT: Cap Inspection Report (Report); Revitalizing Auto Communities Environmental Response (RACER) Coldwater Road Landfill; MID 005 356 860

On October 17, 2013, staff from the Michigan Department of Environmental Quality (DEQ), Office of Waste Management and Radiological Protection (OWMRP), conducted an inspection of the cap of the RACER Coldwater Road Landfill. Final construction and capping of the landfill was substantially completed in 1994 in accordance with the approved Closure Plan as required by the Corrective Action Consent Order, WMD Order No. 64-05-92, signed October 29, 1992. The purpose of the inspection was to evaluate the facility's compliance with the September 12, 2008, approved Postclosure Plan.

Based on the OWMRP inspection, the condition of the landfill cap was found to be generally satisfactory and the cap appeared to be well maintained. However, a few items of concern were noted during the inspection. The items of concern, along with the OWMRP recommended corrective action(s) are summarized in the following table, Summary of Recommended Correction Actions. For the specific locations, photographs, and additional details of the conditions noted, please see the enclosed Report.

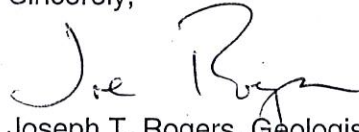
The facility must provide a response to the OWMRP within 30 days from receipt of this letter and Report detailing the proposed or implemented corrective actions for each of the items of concern identified.

Table 1 – Summary of Recommended Corrective Actions

Item of Concern	Recommended Corrective Action
Vegetative Cover – Sparse Vegetation	The locations of all sparsely vegetated former animal burrow areas must be inventoried and identified on a map that must be provided as part of the corrective action report. The facility must re-seed the impacted former animal burrow areas as soon as practicable in the spring. It is anticipated that the OWMRP will conduct a follow-up inspection sometime next spring to document that all impacted areas have been repaired.
Animal Burrows	The animal burrows discovered, as well as any additional burrows, must be addressed on an ongoing basis, with filling and repair occurring as soon as they are identified. Repair must include an inspection of the depth of the burrow to ensure the clay cap has not been impacted. Photographic documentation of the repaired area must be provided as part of the corrective action report.

If you have any questions, please contact me at rogersj5@michigan.gov or 517-284-6569.

Sincerely,



Joseph T. Rogers, Geologist
Permit and Corrective Action Unit
Office of Waste Management and
Radiological Protection

Enclosure

cc: Mr. Clifford Yantz, O'Brien & Gere Engineers, Inc.
Ms. Virginia Himich, DEQ
Mr. Richard Conforti/Mr. John McCabe, DEQ
Mr. William Yocum, DEQ
HWS-C&E File

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