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Subject:
RCRA Facility Investigation Summary Letter
MID005356696 - RACER SMI Land and Green Point Landfill
Saginaw, Michigan

ENVIRONMENT

Date:
January 27, 2016

Dear Ms. Kaelber-Matlock:

Contact:
Scott Clearwater

This letter has been prepared on behalf of the Revitalizing Auto Communities Environmental Response (RACER) Trust at the request of the Michigan Department of Environmental Quality (MDEQ) to identify the documents for investigations and assessments conducted at the Saginaw Malleable Industrial Land and Green Point Landfill (the Facility) in Saginaw, Michigan (Figure 1), that in combination satisfy the requirements of a Resource Conservation and Recovery Act (RCRA) Facility Investigation (RFI).

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Our ref:
B0064434.2016

The key components of an RFI are:

1. Environmental Setting
2. Investigation Activities
3. Investigation Results
4. Contamination Characterization
5. Nature and Extent Recommendations
6. Human Health and Ecological Risk Assessment

These key components of an RFI are summarized in the following documents:

- *Remedial Investigation (RI) Report July 5, 2001 (BBL)*: Provides a summary of the environmental setting, investigation activities, investigation results, RI activities completed, and nature and extent of chemical constituents.
- *Feasibility Study (FS) Report July 29, 2003 (BBL)*: Provides the Human Health Evaluation (HHE) and the Ecological Risk Assessment (ERA).
- *Remedial Action Plan (RAP) Report July 30, 2008, (Modified on December 31, 2008 and May 29, 2009) (Arcadis)*: Provides an addendum to the HHE, which evaluates additional data collected since the RI and FS.

Investigation activities completed following approval of the RAP (February 27, 2009) are provided in the following:

- *2015 Supplemental RCRA Investigation Summary Report January 11, 2016 (Arcadis)*: Provides a summary of a supplemental investigation completed following a re-evaluation of the 1991 Preliminary Assessment/ Visual Site Inspection Report as requested by MDEQ. The investigation found evidence that a historic spill or release may have occurred from SWMU #1 or #13. However, the area is adequately characterized and does not warrant further investigation or remedial action other than the currently planned deed restrictions, and does not change any conclusions in the HHE or ERA.
- *Risk-Based Disposal Work Plan for PCB-Impacted Material May 8, 2015 [Conestoga-Rovers & Associates (CRA)]*: Provides a summary of the delineation of PCBs in the concrete floor slab and the delineation of PCBs in soil in the I27.7 Manhole Area. Risks associated with PCBs in concrete and soil will be significantly reduced after implementation of the proposed Work Plan.
- *LNAPL Status – RACER Malleable Iron Industrial Land November 7, 2014 (CRA)*: Provides a summary of the status of LNAPL in two areas at the Site, the Southwest Plant LNAPL Area and the Quench Pit Area. LNAPL was found to be effectively immobile, unrecoverable, and stable non-migrating overall in the bulk of the soil matrix. There are currently no unacceptable exposure pathways associated with LNAPL. Current activities include: LNAPL gauging to confirm LNAPL is not migrating in both areas and active recovery in one monitoring well and passive recovery at a few monitoring wells in the Quench Pit Area.

Other assessments completed:

- *RCRA Corrective Action Environmental Indicator (EI) 750 (Migration of Contaminated Groundwater Under Control)*: Approved by MDEQ September 15, 2006.
- *RCRA Corrective Action EI 725 (Current Human Exposures Under Control)*: Approved by MDEQ September 27, 2007.

We believe the investigation and assessment activities completed and summarized in the documents identified above, satisfy the requirements of an RFI.

Ms. Kaelber-Matlock
January 27, 2016

Sincerely,

Arcadis U.S., Inc.



Scott Clearwater
Certified Project Manager

Copies:

John McCabe (MDEQ)

John-Eric Pardys (GHD)

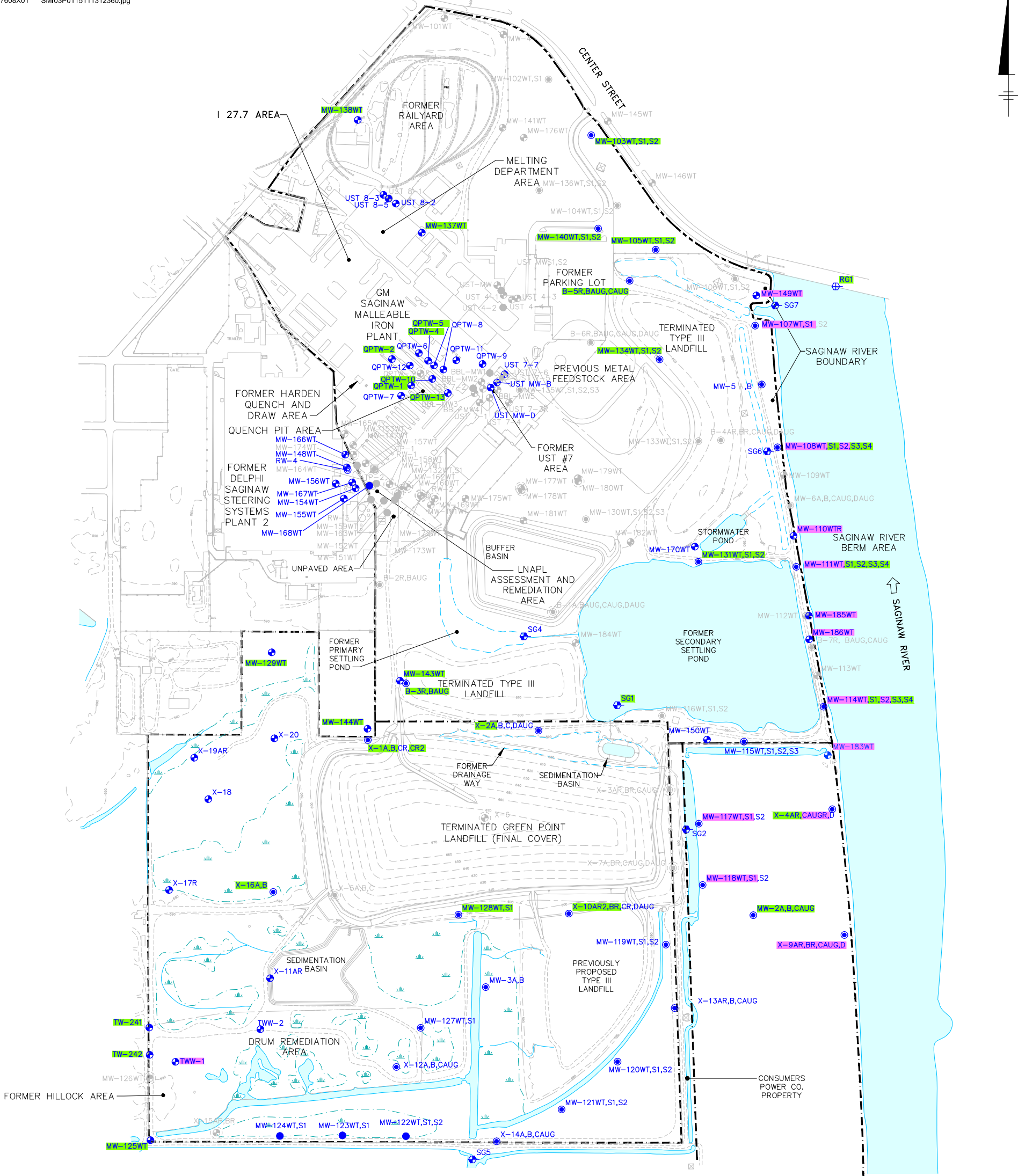
Dave Favero (RACER)

Enclosures:

Figures

- 1 Site Map

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STATE OF MICHIGAN PROPERTY
(PREVIOUSLY RUBIN SCHULTZ PROPERTY)

LEGEND:

- SAGINAW MALLEABLE INDUSTRIAL LAND PROPERTY LINE (APPROX.)
- - - PROPERTY LINE (APPROX.)
- - - UNPAVED ROAD
- - - GROUND SURFACE ELEVATION CONTOUR (10 FT INTERVAL)
- - - FENCE LINE
- SWAMPY AREA
- MW-125WT MONITORING WELL
- MW-2A,B,CAUG MONITORING WELL CLUSTER
- SG5 STAFF GAUGE
- TP-1 PIEZOMETER
- RW-1 RECOVERY WELL
- X-6 ABANDONED MONITORING WELL
- X-5A,B,C ABANDONED MONITORING WELL CLUSTER
- RG1 RIVER GAUGE
- MW-152WT WELL NOT FOUND

RAP (7/31/08)
MONITORING PROGRAM; REVISED 12/08

SAMPLING AND GROUNDWATER ELEVATION MEASUREMENT LOCATION

LNAPL AND/OR GROUNDWATER ELEVATION MEASUREMENT LOCATION

0 250' 500'
GRAPHIC SCALE

- NOTES:
- THIS PHOTOGRAMMETRIC BASE MAP FOR THE GM SAGINAW MALLEABLE IRON PLANT AND DELPHI SAGINAW STEERING SYSTEMS PLANT 2 PROPERTIES WAS PREPARED BY LOCKWOOD MAPPING, INC. OF ROCHESTER, NEW YORK. AERIAL PHOTOGRAPHY WAS CONDUCTED ON 11/11/94. ORIGINAL LOCKWOOD MAP WAS AT A SCALE OF 1"=100' AND WAS INTERPRETED FOR TWO-FOOT CONTOURS.
 - BASE MAP HAS BEEN MODIFIED TO INCORPORATE BUFFER BASIN, SEDIMENTATION BASINS, WETLANDS MITIGATION AREA, AND GREEN POINT LANDFILL (GPL) FINAL COVER FROM THE FINAL ENGINEERING DESIGN REPORT PREPARED BY BBL FOR THE GPL, DATED JANUARY 1998.
 - VERTICAL DATUM REFERENCED TO NGVD OF 1929, HORIZONTAL DATUM REFERENCED TO MICHIGAN SPC-NAD 1983.
 - PROPERTY BOUNDARY DIGITIZED FROM SPICER GROUP DRAWING NO. A-21854-1, DATED 3/27/98.
 - BASE MAP INFORMATION SOUTH OF MAIN REALM, INC. PROPERTY LINE FROM AIR-LAND SURVEYS, INC. PHOTO DATE 11/90, MAPPING DATE 10/91.

SAGINAW MALLEABLE INDUSTRIAL LAND
GREEN POINT LANDFILL
SAGINAW, MICHIGAN

SITE MAP

