



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF  
ENVIRONMENT, GREAT LAKES, AND ENERGY  
MATERIALS MANAGEMENT DIVISION



PHILLIP D. ROOS  
DIRECTOR

July 21, 2025

VIA EMAIL

Brendan Mullen, Michigan Cleanup Manager  
RACER Trust  
500 Woodward Ave, Suite 2650  
Detroit, Michigan 48226

Dear Brendan Mullen:

SUBJECT: Conditional Approval: *Revised Biosparge Shut Down Test Proposal, January 17, 2025, RACER Trust, Lansing Plants 2 & 3; MID 980 700 827; Waste Data System Number 399177*

The Department of Environment, Great Lakes, and Energy (EGLE), Materials Management Division (MMD), and Drinking Water and Environmental Health Division (DWEHD), have reviewed the January 17, 2025, *Revised Biosparge Shut Down Test Proposal* (Shut Down Proposal), prepared by Arcadis on behalf of Revitalizing Auto Communities Environmental Response Trust (RACER), for Plants 2 and 3 located at 2800-2801 West Saginaw Street, Lansing, Michigan. The Shut Down Proposal provides a plan to conduct a shutdown evaluation for select transects of the biosparge groundwater treatment system to evaluate the potential rebound of 1,4-dioxane concentrations and to optimize operation and cost-effectiveness of the biosparge remedy. The Shut Down Proposal was reviewed by the MMD for compliance with Part 111, Hazardous Waste Management, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended, and the administrative rules promulgated thereunder. The Shut Down Proposal was reviewed by the DWEHD because the 1,4-dioxane contamination is located within a designated wellhead protection area.

Based on the review, EGLE approves the Shut Down Proposal subject to the following condition:

- The Shut Down proposal is to conduct a shutdown evaluation for select transects of the biosparge groundwater treatment system to evaluate the potential rebound of 1,4-dioxane concentrations and to optimize operation and cost-effectiveness of the biosparge remedy and is not designed to document final shut down of the system. Any recommendations provided in the Report that will be submitted after one year of monitoring (if a restart of the system is not triggered earlier) as proposed in Section 2 of the Shut Down Proposal require EGLE review and approval prior to implementation.

Brendan Mullen

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If you have any questions, please contact Joe Rogers, Geologist Specialist, Corrective Action Unit, Hazardous Waste Section, MMD, at 517-599-5312; RogersJ5@Michigan.gov; or EGLE-MMD-HWS@Michigan.gov.

Sincerely,



Elizabeth Garver, Supervisor  
Corrective Action Unit  
Hazardous Waste Section  
Materials Management Division  
248-417-4135

cc: Dave Favero, Michigan Deputy Cleanup Manager, RACER  
Jackie Sailing, Technical Expert, Vice President, Arcadis  
Patrick Curry, Technical Expert - Geology, Arcadis  
Tiffany Linder, Certified Project Manager, Arcadis  
Cheryl Loudon, Environmental Compliance Specialist, Lansing Board of Water and Light  
Geneva Vanlerberg, EGLE  
Kimberly M. Tyson, EGLE  
Joe Rogers, EGLE  
Shaun Shields, EGLE  
Approved Plan – Work