



Environmental Resources Group

28003 Center Oaks Court • Suite 106 • Wixom, MI • 48393
Phone: 248-773-7986 • Fax: 248-924-3108

December 22, 2015

Mr. Jim Innes
Michigan Department of Environmental Quality, RRD
Constitution Hall
525 West Allegan Street
Lansing, Michigan 48909

RE: Mixing Zone Request
RACER Trust-Davison Road Industrial Land
Burton, Michigan

Dear Mr. Innes:

Environmental Resources Group, LLC (ERG) on behalf of RACER Trust has prepared the enclosed Mixing Zone Request for the above referenced site. If you have any questions or require additional information please contact me at 248.773.7986.

Thank you,

Environmental Resources Group, LLC

Susan Graves
Senior Project Manager

CC: Dave Favero, RACER Trust
Enc



Request for DEQ Review of Response Activity Plan

This form is required for submittal of a request for the DEQ to review a Response Activity Plan, under Section 20114b, Part 201, Environmental Remediation, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended.

Section A: Type of Response Activity Plan being Submitted (Check all that apply):

Remedial Investigation	☐	20b(2) Site Specific Criteria	☐
Evaluation Plan	☐	(modification of generic criteria)	
Feasibility Study	☐	20b(3) Site Specific Criteria or Surrogate	☐
Remedial Action Plan	☐	(no generic criteria available)	
Interim Response Plan	☐	Section 20118(4) and (5) Request	☐
Mixing Zone Request	☒	Land or Resource Use Restrictions	☐
20e(14) De Minimus GSI Impact	☐	Other, Specify:	☐

The Response Activity Plan addresses the entire facility: ☒
(entire facility as defined by Part 201, all releases, hazardous substances, and environmental media)

The Response Activity Plan does not address the entire facility: ☐
Please specify the release(s), hazardous substance(s), environmental media, and/or portions of the facility addressed by the Response Activity Plan.

Section B: Facility/Property Subject to (Check all that apply):

Facility regulated under Part 201	☒
Part 201 Facility ID (if known): 25000447	
Leaking Underground Storage Tank regulated pursuant to Part 213	☐
Part 211/213. Facility ID, if known:	
Oil or gas production and development regulated pursuant to Part 615 or 625	☐
Licensed landfill regulated pursuant to Part 115	☐
Licensed hazardous waste treatment, storage, or disposal facility regulated pursuant to Part 111	☐
Consent Agreement or other legal agreement with the MDEQ	☒

Section C: Facility and Locational Information:

Facility Name: Davison Road Industrial Land	County: Genesee
Street Address of Property: Davison and Donegal	City/Village/Township: Burton
City: Burton State: MI Zip: 48509	Town: 7N Range: 7E Section: 10
Property Tax ID (include all applicable IDs): 59-10-100-030 (0.575 Acres) 59-10-100-031 (55.63 Acres)	Quarter: SW Quarter- NW Quarter:
Status of submitter relative to the property (check all that apply):	Decimal Degrees Latitude: 43.031129 Decimal Degrees Longitude: -83.629735
	Reference point for latitude and longitude: Center of site ☐ Main/front door ☐ Front gate/main entrance ☒ Other ☐
	Collection method: Survey ☒ GPS ☐ Interpolation ☐
Former Current Prospective	
Owner ☐ ☒ ☐	
Operator ☐ ☒ ☐	

Request for DEQ Review of Response Activity Plan

Section D: Submitter Information:

Entity/person requesting review: RACER Trust		
Contact Person: David Favero, Deputy Cleanup Manager-MI		
Submitter Address: 500 South Woodward Ave., Suite 2650		
City: Detroit	State: Michigan	Zip: 48226
Telephone: 734.879.9525	E-Mail: <u>dfavero@racertrust.org</u>	
Relationship of contact person to the submitter: Same		
Owner Name, if different from submitter:	Company:	
Address:		
City:	State:	Zip:
Telephone:	E-Mail:	

Section E: Are/were the following present at the facility (Check all that apply):

	Current	Previous	Unknown
Mobile or Migrating Non Aqueous Phase Liquids (NAPL)	☐	☐	☐
Soil contamination above any residential criteria	☒	☐	☐
Soil contamination above any non-residential criteria	☒	☐	☐
Soil aesthetic impacts	☐	☐	☐
Groundwater contamination above any residential criteria	☒	☐	☐
Groundwater contamination above any non-residential criteria	☒	☐	☐
Groundwater aesthetic impacts	☐	☐	☐
Soil Gas contamination above residential vapor intrusion (VI) screening levels	☐	☐	☐
Soil Gas contamination above non-residential VI screening levels	☐	☐	☐
Conditions immediately dangerous to life or health (IDLH)	☐	☐	☐
Fire & Explosion hazards related to releases	☐	☐	☐
Contamination existing in drinking water supply	☐	☐	☐
Imminent threat to drinking water supply	☐	☐	☐
Impact to Surface Water	☐	☐	☐
Surface Water Sediments above screening levels	☒	☐	☐
	☐	☐	☐

Section F: The following questions assist DEQ in evaluating this request.

Known or Suspected Contaminant(s) Type (Check all that apply):			
Petroleum	☐	Volatile Organic Compounds	☐
Metals	☒	Other	☐
Current Site Status (Check all that apply):			
Undergoing property transfer	☐	Active operations	☐
Inactive operation	☒		
Current Property Use:			
Residential	☐		
Non-residential	☒		
Anticipated Property Use:			
Residential	☐		
Non-residential	☒		
Estimated Area of Contamination Addressed in Response Action Plan (Cumulative):			
Currently undetermined	☐	< 0.5 acre	☐
> 0.5 acre	☒		
Migration:			
	Yes	No	Unknown
Has contamination migrated beyond the property boundaries?	☐	☒	☐
Has the Notice of Migration been submitted?	☐	☐	☐
Facility Investigation Status:			
Ongoing	☐	Complete	☒



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Owner ☐ ☒ ☐	
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Owner Name, if different from submitter:	Company:	
Address:		
City:	State:	Zip:
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	☐	☐	☐

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Facility Investigation Status:			
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Mixing Zone Request

RACER Trust – Davison Road Industrial Land – Burton, MI

LIST OF ATTACHMENTS

ATTACHMENT 1

Request to MDEQ for Mixing Zone – Based GSI Criteria

ATTACHMENT 2 - Figures

Figure 1

Site Location Map

Figure 2

Site and Cross Section Location Map

Figure 3

Metals, VOCs and PNAs in Soil Above Background, GSIP and Calculated GSIP

Figure 4

Direct Contact Location Map

Figure 5

Direct Contact Investigation DC-4-SO₂

Figure 6

Direct Contact Investigation DC-17

Figure 7

Total Metal Concentrations in Groundwater Above GSI

Figure 8

Groundwater Gradient Map (August 2015)

Figure 9

Interpreted Contaminant Map

Figures 10

Cross Section Location Map

Figures 11, 12, 13 & 14

Cross Sections

Mixing Zone Request

RACER Trust – Davison Road Industrial Land – Burton, MI

ATTACHMENT 3 - Tables

Table 1 - Soil Analytical Results - Metals

Table 2 - Soil Analytical Results-Non Residential Exceedances - VOCs

Table 3 - Soil Analytical Results-Non Residential Exceedances - PNAs

Table 4 - Groundwater Analytical Results - Metals

Table 5 - Static Groundwater Elevation Data (August 2015)

Table 6 - Estimated Discharge Rate of Interpreted Contaminant Plumes Potentially Discharging Into
Creek

ATTACHMENT 4 - Slug Tests

ATTACHMENT 5 - Hydrologic Studies Unit Memo/Gilkey Creek Data

ATTACHMENT 6 - Laboratory Reports

April 2015-Groundwater

August 2015-Groundwater

August 2015-Soil

ATTACHMENT 1

Request to MDEQ for Mixing Zone – Based GSI Criteria



Remediation and Redevelopment Division

Michigan Department of Environmental Quality

ATTACHMENT 1 REQUEST TO MDEQ FOR MIXING ZONE-BASED GSI CRITERIA

Shaded selections of this form should be completed with appropriate information, documentation or narrative to provide the necessary information for the MDEQ to process the request. Original sources of information, if not supplied, should be appended or clearly referenced.

TO: Mr. Jim Innes
Remediation and Redevelopment Division
Lansing District

FROM: Susan Graves
Environmental Resources Group, LLC
28003 Center Oaks Ct, Suite 106
Wixom, MI 48393

SUBJECT: Request for Mixing Zone - Based Criteria
Facility Name: Davison Road Industrial Land-Burton, MI
County Genesee - Part 201 Facility ID No: 25000447

We are requesting a mixing zone determination for the above referenced facility, located:

SW $\frac{1}{4}$ of the NW $\frac{1}{4}$ of Section 10, T7N, R7E in City of Burton, Genesee County, Michigan, where shown on Figure 1, Attachment 2.

The facility characteristics include:

1. The name of the receiving surface water body and the location of the venting groundwater contaminant plume:

The receiving surface water body is Gilkey Creek and the venting groundwater is located approximately 1,700 feet upstream (east) of Center Road. There are two interpreted plumes emanating east and northeast of Gilkey Creek. Plume #1 includes monitoring wells SB/MW-3-12, SB/MW-4-12 and SB/MW-16-14 and Plume # 2 includes monitoring wells SB/MW-2, SB/MW-9-12, SB/MW-10-12, SB/MW-12-12 and SB/MW-15-14), Refer to Attachments 2 and 3 for Figures and Tables.

This is a ☐ new ☐ increased or ☒ existing loading.

Recreational Use: ☒ Yes ☐ No (if no, provide an explanation of conditions that make recreation use not applicable to site conditions).



Michigan Department of Environmental Quality

If this is a new loading, or increased loading above previously authorized levels, an antidegradation demonstration, which includes the information in 8 and 9 below, or a demonstration of qualification for an exemption under Rule 323.1098 (7) or (8), is required.

7. Please check whether there is

- ☐ an antidegradation demonstration (Information for 8 and 9 is included.) **or**
- ☐ a demonstration of qualification for an exemption (Refer to 323.1098 (7) and (8) for elements needed for this demonstration.)

Not Applicable

Please identify below who prepared the antidegradation or exemption demonstration.

8. This is a new or increased loading from venting groundwater. The social or economic development and the benefits to the area in which the waters are located that would be foregone if the new or increased discharge is not allowed include:

Not Applicable

- Employment increases:
- Production level increases:
- Employment reductions avoidance:
- Efficiency increases:
- Industrial, commercial, or residential growth:
- Environmental or public health problem corrections:
- Economic or social benefits to the community:
- Other relevant factors:

Attachment 2

Figures

Attachment 3

Tables

Attachment 4

Slug Tests

