

MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY

INTEROFFICE COMMUNICATION

May 14, 2002

TO: Kevin Holdwick, Permits Unit
Hazardous Waste Program
Waste Management Division

FROM: Joe Rogers and John McCabe, Technical Support Unit
Hazardous Waste Program
Waste Management Division

SUBJECT: Comments on CRA's Responses to Waste Management Division's (WMD's)
Comments on Draft RCRA Facility Investigation (RFI) Report
Former Peregrine (US), Inc., Coldwater Road Facility MIR 000 020 743

Here are our comments regarding CRA's March 28, 2002 response to our comments regarding the Former Peregrine Coldwater Road Draft RFI Report. If you have any questions or need any additional information, please contact either of us. Thanks.

- 1) **Response to Comment #1** The response agreed with our observation that the use of Part 201, Environmental Remediation, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended, generic industrial criteria limits future land use to industrial zoning and stated that institutional controls limiting the zoning would be proposed as a component of the Corrective Measures Study for the facility.
- 2) **Response to Comment #2** The response provided a copy of the Genesee Township zoning ordinance per our request. The zoning for the facility complies with the exposure scenario envisioned in the Part 201 generic industrial criteria.
- 3) **Response to Comment #3** We had requested additional discussion/justification of sampling locations in the Former Scrap Metal Storage Area (AOI 8). The response was satisfactory, presenting additional discussion and photographs to explain/document that samples were not collected under the pits because, based on the visual inspection, no obvious odors, staining, or Photoionization Detection (PID) readings were noted.
- 4) **Response to Comment #4** We had requested additional delineation around soil boring K-35. They have agreed to do so and provided an acceptable workplan for additional sampling.
- 5) **Response to Comment #5** We had requested additional discussion/justification of sampling locations in the Former Press Room (AOI 19). The response was satisfactory, providing discussion and photographs to explain/document that samples were not collected under the pits because, based on the visual inspection, no obvious odors, staining, or PID readings were noted.

- 6) **Response to Comment #6** We had requested an additional round of groundwater sampling and some clarifications to the text of the draft RFI report concerning groundwater sampling results. They agreed to the additional groundwater sampling and provided an acceptable draft of the textual revisions.
- 7) **Response to Comment #7** We had requested an explanation of several data quality issues. A satisfactory explanation and supporting documentation was provided.
- 8) **Response to Comment #8** We had requested that the groundwater use survey be expanded to cover the area within 1.5 miles of the site. An expanded use survey was conducted as requested and confirmed use of the shallow drift aquifer within 1.5 miles of site.
- 9) **Response to Comment #9**
- a) The approach of implementing site specific deed restrictions for the shallow groundwater is a recommended alternative approach addressing the impacted shallow groundwater at the site for the following reasons:
 - i) The heavily industrialized and developed historical use of the site and the fact the investigation is "voluntary" with less than "normal" critical regulatory oversight.
 - ii) The variable nature of the local geology/hydrogeology (fill material overlying heterogeneous glacial till) with many man-made potential preferential pathways present (utility corridors, deep foundations, etc.).
 - iii) The fact the underlying glacial drift aquifer is used for potable purposes in the vicinity of the facility.
 - b) Details regarding the pump test for the additional investigation documenting the hydraulic isolation of the perched unit are not provided. The pump test will need to be appropriately conducted in terms of pumping rate, pumping duration and monitoring locations, and analytical methods to provide useful documentation.
 - c) At least two site-wide cross-sections (one N-S, one E-W) showing the contact between the upper perched zone, the confining clay, and the drift aquifer must be provided in the Groundwater Not In An Aquifer (GWNIAA). The sections must also show the locations of existing utility corridors and other subsurface structures (foundations, drainage tiles, etc.) that have the potential to provide preferential pathways for groundwater flow.
 - d) No discussion was provided regarding the basement area where the confining clay unit is significantly thinner. This area is of particular importance in terms of documenting hydraulic isolation and information in this area must be collected during the proposed pumping test.
 - e) A groundwater sample from PFW-1 (downgradient) must be collected to investigate potential impacts to the drift aquifer.
 - f) A written response from the local health department documenting any concerns that they may have regarding the site and/or the GWNIAA determination must be provided.
- 10) **Response to Comment #10** We requested information on the impact of nearby surface water bodies on site hydrology. Though we had never asked for storm water samples earlier in the project (i.e. Work Plan phase), a discussion of existing data or the collection of both dry and wet weather data to document the quality of effluent, as proposed in the response would be desirable.
- 11) **Response to Comment #11** We had requested additional delineation of arsenic contamination at soil boring BH-2-3-00 and they provided a workplan for doing the requested sampling.

- 12) **Response to Comment #12** We had requested additional delineation of 1,1-dichloroethene contamination at soil boring BH-9-23-00 and they provided a workplan for doing the requested sampling.
- 13) **Response to Comment #13** We had requested additional delineation for Particulate Soil Inhalation Criteria (PSIC) exceedance at BH-9-24-00. They provided a workplan for doing the requested sampling. With respect to earlier remediation effort for nickel and lead PSIC exceedances at BH-9-26-00, all PSIC and IDCC were met. However, two sidewall and both bottom verification samples still exceed drinking water protection criteria for nickel and/or chromium. The facility maintains the drinking water pathway is not applicable and no further action is required here; however, they should be reminded that the GWNIAA determination has not been granted and that the drinking water pathway is still relevant at the site. In addition, the results for the twenty-one random samples and samples surrounding BH-9-25-00 are not presented and/or discussed. This data must be presented and evaluated.
- 14) **Response to Comment #14** We had requested additional information concerning exceedences of Part 201 soil drinking water protection criteria. They responded by stating that the GWNIAA determination would address drinking water concerns. The remaining issues with the GWNIAA determination are discussed in item 9, above.
- 15) **Response to Comment #15** We had requested additional delineation of arsenic contamination at several locations. They provided a workplan for doing the requested sampling.
- 16) **Response to Comment #16** We had stated that the preliminary risk evaluation proposed in the draft RFI report was premature. They responded by withdrawing Section 6 from the RFI report until all additional delineation was completed.

Please be advised that our review, in keeping with the concepts of "voluntary corrective action," is largely conceptual and does not involve a detailed audit of data quality or other, more complex aspects of a typical RFI report review.

Please let us know if you have any questions concerning this review.