



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING



DAN WYANT
DIRECTOR

September 26, 2011

Rec'd CRA
OCT 05 2011

Mr. Dave Favero
RACER Trust
2930 Ecorse Road
Ypsilanti, Michigan 48198

Dear Mr. Favero:

SUBJECT: Response to Conestoga-Rovers & Associates July 27, 2011 Letter;
Former Peregrine (US), Inc. (Peregrine), Coldwater Road Facility,
Genesee Township, Michigan; MID 000 020 743

Staff of the Department of Environmental Quality (DEQ), Resource Management Division (RMD), Hazardous Waste Section, has received and reviewed the July 27, 2011, letter prepared by Conestoga-Rovers & Associates (CRA) regarding the on-going corrective action and groundwater monitoring activities at the subject facility.

The document was reviewed for compliance with the applicable provisions of Part 111, Hazardous Waste Management, and Part 201, Environmental Remediation, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended, and its administrative rules, Michigan Administrative Code R 299.5101 *et seq.*, and the Investigation Work Plan approved on October 28, 2010.

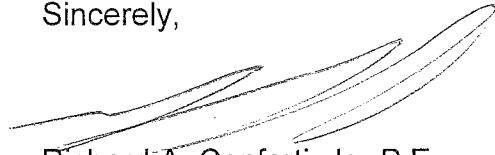
Based on our review, and as discussed in our meeting on September 14, 2011, the RMD has the comments provided below:

1. Response to DEQ Comment #1: The DEQ is in general agreement with the approach regarding the proposed background groundwater concentration study; however, as discussed during the September 14 meeting, DEQ approval of the background concentrations will not be provided until we have reviewed the final calculations. In addition, background concentrations must be calculated using total metals concentrations unless justification can be provided that the total metals concentration is unrepresentative of actual metals concentration in groundwater due to high turbidity and suspended solids introduced during the sampling process and that dissolved metals are more representative of actual metals concentration.
2. Response to DEQ Comment #2: As discussed during the September 14 meeting, the DEQ would like additional monitoring wells installed at the perimeter of the facility in order to more fully investigate the potential for off-site migration of contaminated shallow groundwater. The one monitoring location proposed by CRA is not adequate to fully investigate the issue and document that no off-site migration is occurring. Therefore, the facility must provide additional information

regarding how additional monitoring locations will be selected and monitored. As also discussed during the meeting, it is expected that the additional locations will be selected based on the location of preferential pathways/utility corridors, the presence of shallow groundwater, and the potential connection of those pathways to areas of known present and/or former soil and groundwater contamination.

Please provide the requested information within 60 days of the receipt of this letter. Should you require further information, please contact me at 517-241-2108; confortir@michigan.gov; or DEQ, P.O. Box 30241, Lansing, Michigan 48909-7741.

Sincerely,



Richard A. Conforti, Jr., P.E.
Hazardous Waste Section
Resource Management Division

cc: Mr. Grant Trigger, RACER Trust
Mr. Mike Tomka, CRA
Mr. Jack Schinderle/Mr. John McCabe/Mr. Joe Rogers, DEQ
Mr. William Yocum, DEQ
Corrective Action File