



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING DISTRICT OFFICE



KEITH CREAGH
DIRECTOR

May 25, 2016

Mr. Dave Favero
RACER Trust
500 Woodward Avenue, Suite 1510
Detroit, Michigan 48226

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Dear Mr. Favero:

SUBJECT: Denial of the Response Activity Plan for a Mixing Zone Request,
Davison Road Industrial Land, Burton, Genesee County, Michigan;
Facility ID No.: 25000447

The Department of Environmental Quality (DEQ), Remediation and Redevelopment Division (RRD), has reviewed the Response Activity Plan for a Mixing Zone Request for the Davison Road Industrial Land submitted by Environmental Resources Group on the behalf of RACER Trust on December 29, 2015. The Response Activity Plan is denied pursuant to Section 20114b(3) of Part 201, Environmental Remediation, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended.

The Response Activity Plan for the Davison Road Industrial Land has been denied for the following reason:

Based on review of flows for Gilkey Creek by staff of the DEQ, Water Resources Division, there is not enough flow in this creek to allow for a mixing zone. Arsenic concentrations at all groundwater surface water interface compliance points cannot exceed 10ug/l.

The following suggestions might assist in developing lines of evidence showing the arsenic identified in groundwater is not a result of historic use of the property as a landfill, or that turbidity is causing groundwater samples to show higher levels of arsenic than is actually present:

Consider determining the concentrations of arsenic in the groundwater upgradient of the disposal area that may be contributing to the arsenic concentrations near the creek.

Collect turbidity and oxygen reducing potential readings during future groundwater sampling events to establish whether there are conditions within the aquifer that may be contributing to elevated arsenic concentrations.

Consider installation of pre-packed well screens near and at the same depth as some of the wells with the highest arsenic concentrations to reduce the turbidity in groundwater samples. Experience has shown that samples taken from wells with pre-packed well screens can better represent aquifer metal concentrations.

The deficiencies identified in this letter are based on representations and information contained in the submittal. Therefore, additional response activities may be necessary beyond those identified above, should supplementary information become available.

If you have any questions regarding this matter or wish to discuss the findings of this audit, please contact Mr. Jim Innes, Project Manager, Lansing District Office, at 517-284-5115; innesj@michigan.gov; or DEQ, RRD, Lansing District Office, P.O. Box 30242, Lansing, Michigan 48909.

Sincerely,



Dennis Eagle, District Supervisor
Lansing District Office
Remediation and Redevelopment Division
517-284-5089
eagled@michigan.gov

cc: Ms. Susan Graves, Environmental Resources Group
Mr. Jim Innes, DEQ