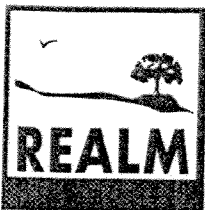


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**Remediation and Liability Management Company, Inc.**

February 13, 2004

Mr. Kevin Holdwick  
Michigan Department of Environmental Quality  
Waste Management Division  
P.O. Box 30241  
Lansing, Michigan 48909-7741

Dear Mr. Holdwick:

Re: Monitoring Well Abandonment  
Response to MDEQ's Letter Dated December 16, 2003  
Former Peregrine (US) Inc. Coldwater Road Facility, Genesee Township, Michigan  
MIR 000 020 743

This letter presents a response to Comment 8 in the Michigan Department of Environmental Quality (MDEQ) letter dated December 16, 2003, regarding "Groundwater Not in an Aquifer (GWNIAA) Evaluation Report" for the Former Peregrine (US) Inc. Coldwater Road Facility located in Genesee Township, Michigan:

*A significant number of monitoring wells have been installed at the Facility over the course of several investigations; only a subset of which were sampled as part of the RFI. Based on the results reported in the RFI, it appears that several of these monitoring wells have been lost or destroyed. Although these were not RCRA monitoring wells, they still should have been abandoned appropriately in accordance with the procedures specified in R 299.9612(1)(b). Without proper abandonment procedures implemented, the lost or destroyed wells represent a potential conduit for the migration of contamination to the drift aquifer that eliminates any potential for GWNIAA designation for the perched unit. The Facility must determine if any of the destroyed or lost wells were drift aquifer wells, and if so, these wells must be located and abandoned in accordance with the procedures specified in R 299.9612(1)(b). In addition, the Facility must locate all remaining wells at the Facility and insure that they are properly marked and recorded if required for additional investigation purposes or properly abandoned as specified above if they are no longer useful. Please provide a summary report of the above determination to the WHMD within 60 days of receipt of this letter.*

REALM conducted hydraulic testing and groundwater quality monitoring at the Facility in October 2002. These activities were conducted to support the Groundwater Not In An Aquifer (GWNIAA) investigation. During the course of this investigation, some of the monitoring wells completed in the shallow perched zone (PFW-3, PFW-4, PFW-5, PFW-8, PFW-12, MW-2, MW-4, MW-5, MW-6, MW-7, MW-8, MW-9, MW-10, MW-11, MW-12, and MW-13) were not located (see Figure 1). It was subsequently identified that two of these wells (MW-11 and MW-12) had been abandoned and replaced. If the remaining wells can be located, they will either be repaired or abandoned once the need for additional groundwater monitoring at the Site has been determined. None of the subject wells are completed in the drift aquifer, and therefore no risk of contamination of the drift aquifer is associated with the subject wells.

Mr. Kevin Holdwick  
February 13, 2004  
Page 2

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Should you have any questions on the above, please do not hesitate to contact me at (248) 753-5799.

Yours truly,

REMEDICATION AND LIABILITY MANAGEMENT COMPANY, INC.

Cheryl Hiatt  
Project Manager

SE/jdh/12636/16  
Encl.

c.c.: Joe Rogers – MDEQ  
John McCabe – MDEQ  
Jean Caufield – GM  
Marilyn Dedyne – GM  
Robert Metcalf – GM  
Tony Finch – OBG  
Steve Song – ENVIRON  
Glenn Turchan – CRA  
Sylvie Eastman – CRA

Confidential under FOIA  
Alex Rothchild  
LFR  
Sep 30, 2009 09:43