



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

AUG 13 2013

REPLY TO THE ATTENTION OF:

Mr. Grant Trigger
Michigan Cleanup Manager
RACER Trust
2930 Ecorse Road
Ypsilanti, Michigan 48198

Re: U.S. EPA Coordinated Approval
Revitalizing Auto Communities Environmental Response Trust (RACER)
Potential Area of Concern (PAOC) 18
Former General Motors Willow Run Company Vehicle Operations (CVO)
2901 Tyler Road, Ypsilanti, Michigan
MID 005 356 795 and MIK 468 293 311

Dear Mr. Trigger:

This letter is a Toxic Substances Control Act (TSCA) PCB Coordinated Approval of your February 27, 2013 request for remediation and disposal of Polychlorinated Biphenyl (PCB) impacted soils and dense non-aqueous phase liquid (DNAPL) from the PAOC 18 at the Willow Run Company Vehicle Operations (Willow Run CVO) site in Ypsilanti, Michigan. This contamination is a result of operational activities that occurred prior to 1978. This approval is granted in accordance with TSCA Section 6(e) and the Federal PCB regulations at 40 Code of Federal Regulations (CFR) §761.77.

The Willow Run CVO property is subject to the Resource Conservation and Recovery Act of 1976 (RCRA) Subtitle C Corrective Action (CA) requirements. The Michigan Department of Environmental Quality (MDEQ) is the lead agency in oversight of RCRA CA obligations at the Willow Run CVO under its authority as a state authorized to implement RCRA, 42 U.S.C., Section 6926, and in furtherance of its statutory and regulatory responsibilities pursuant to Part 111, Hazardous Waste Management, and Part 201, Environmental Remediation, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (NREPA), Michigan Compiled Laws (MCL) 324.1101 *et seq.* and MCL 324.20101 *et seq.*

RACER formally requested approval from the MDEQ of response activities outlined in the February 2013 PAOC 18 Interim Measures Work Plan which includes the scope of work, clean up levels, planned waste disposal facilities, previous sampling results and additional characterization and sampling strategies for PCBs in soil, groundwater and DNAPL. MDEQ approved the plan on August 2, 2013.

The MDEQ approved PAOC 18 Interim Measures Work Plan constitutes a "decision and enforcement document issued by an authorized State Director for a State Program that has been approved by the EPA" that serves as the technical and legal basis of the TSCA PCB Coordinated Approval pursuant to 40 CFR §761.77(c)(1)(i). Under this TSCA Coordinated Approval, EPA finds that PCB remediation activities conducted in accordance with the PAOC 18 Interim Measures Work Plan will not present unreasonable risk of injury to health or the environment. RACER must abide by the conditions identified in the August 2, 2013 MDEQ approval letter for remediation and disposal of PCB Remediation Waste generated under the PAOC 18 Interim Measures Work Plan.

In accordance with 40 CFR §761.77(a)(3), you must notify EPA in writing within 5 calendar days of any changes relating to PCB waste management requirements in the approved PAOC 18 Interim Measures Work Plan.

This letter does not relieve the site owner from compliance with any other federal, state or local regulation and does not preclude EPA from initiating any enforcement action, including an action seeking civil penalties for any violation of federal regulations.

If you have any further questions regarding this matter, please feel free to contact Jean Greensley of my staff at (312) 353-1171 or greensley.jean@epa.gov.

Sincerely,



Margaret M. Guerriero

Director

Land and Chemicals Division

cc: Dave Favero, Racer Trust
Beth Landale, CRA
Kevin Lund, MDEQ
Dr. Deb MacKenzie-Taylor, MDEQ