



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
SAGINAW BAY DISTRICT OFFICE



C. HEIDI GRETHUR
DIRECTOR

October 31, 2017

Mr. David Favero
RACER Trust
500 Woodward Avenue, Suite 2650
Detroit, Michigan 48226

Dear Mr. Favero:

SUBJECT: Recreational Use Risk Evaluation, Saginaw Malleable Industrial Land, Green Point Landfill, and Peninsula Properties (SMI) – Saginaw, Saginaw County, Michigan, MERA No. 73000014

The Department of Environmental Quality (DEQ), Remediation and Redevelopment Division (RRD), has reviewed the Recreational Use Risk Evaluation (Report) submitted by Arcadis of Michigan, LLC (Arcadis) on behalf of Revitalizing Auto Communities Environmental Response (RACER) Trust dated September 18, 2017. This report was submitted under Section 20120(b) of Part 201 of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (NREPA) in order to seek approval for use of site-specific recreational use criteria for the SMI site in the event it is redeveloped for passive recreational use. Multiple meetings and correspondence have taken place over the past year between the DEQ, RACER Trust and Arcadis in order to ensure the recreational use risk evaluation reflects best available information concerning the toxicity and exposure risk to public health posed by the hazardous substances or other factors, as required by Section 20120(b)(1).

As a result of our review the DEQ concurs with the general approach used to identify the contaminants of concern and develop the recreational criteria for relevant pathways at the site. Criteria were developed for several human health related pathways including soil direct contact, soil to ambient air or particulate inhalation, and sediment direct contact. Justifications and explanations were provided to support the parameters, assumptions and methodologies used to develop the site-specific recreational criteria. The proposed criteria are approved for use at this site. Contaminants of potential concern on-site were evaluated in comparison to the site specific recreational use criteria to determine whether response actions were necessary. Based on the proposed future site use restrictions, evaluations determined future response actions were not necessary to address human health related impacts with the exception of the following items discussed below:

1. Elevated lead soil concentrations have been identified in two locations on-site. Further sampling is needed to determine whether additional response actions are necessary. It is the DEQ's understanding that one area of lead impact will be fenced to limit access pending future work. Delineation samples have been collected and analytical results are pending from the other area. The results will be used to determine if a remedy is needed.

2. The DEQ did not fully agree with evaluation of the ambient air inhalation pathway in this Report. At the department's request additional evaluation of this pathway was completed by Arcadis and submitted to the DEQ. The evaluation addressed DEQ's concerns and the site-specific ambient air inhalation criteria proposed in the Report are approved.
3. The Report proposes site-specific recreational use criteria of 2,250 parts per trillion (ppt) for dioxin. Although the DEQ is in general agreement with the assumptions used to generate this criteria, discussions between DEQ, RACER and Department of Natural Resources (the potential future owner of the site), have resulted in agreement for use of 2000 ppt to evaluate risk associated with passive recreational use. This decision was made to be consistent with evaluations at other parks in the Tittabawassee River system upgradient of this site. Dioxin was historically identified in soils in the southern portion of the SMI site in excess of the direct contact value developed for site-specific recreational use. Additional work is needed to determine whether dioxin is located above recreational use criteria in areas that may be frequented by the public and may pose a direct contact concern. Further dioxin sampling activities are being coordinated with other parties as it appears RACER is not responsible for the dioxin impact identified.

All information and determinations presented by the RRD in this letter are based on information currently known to RRD staff. The discovery of new information regarding environmental conditions or regulated substances at the facility that are not known to the RRD at the date of this letter may result in a request by the RRD for additional response activities to further define horizontal and vertical extent. Such request(s) will be based on the need to protect the public health, safety, and welfare or the environment. If you have any questions regarding this letter, please contact Amanda Armbruster, Project Manager, at 989-894-6242; armbrustera@michigan.gov; or DEQ, 401 Ketchum Street, Suite B, Bay City, Michigan 48708; or you may contact me.

Sincerely,



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Remediation and Redevelopment Division
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cc: Mr. Scott Clearwater, Arcadis
Mr. Marc Miller, DNR
Ms. Amanda Armbruster, DEQ