

26850 Haggerty Road
Farmington Hills, Michigan 48331
United States
United States



Our ref: 12573440-LTR-11

January 15, 2024

Ms. Jennifer Stanhope
Land, Chemicals, and Redevelopment Division
77 West Jackson Blvd., LR-16J
Chicago, Illinois 60604-3590

2nd 2023 Semi-Annual Progress Report
Performance Based Administrative Order on Consent
Docket Number RCRA 05 2011 0025
Eckles Road Site, Livonia, Michigan
USEPA ID No. MID 005356 621

In accordance with the Performance Based Administrative Order on Consent between the U.S. Environmental Protection Agency Region 5 (USEPA) and Revitalizing Auto Communities Environmental Response Trust (RACER), please find the attached progress report for the 2nd half of 2023 (July 1, 2023 through December 31, 2023).

Please let us know if you would like to discuss further. Thank you.

Regards,

A handwritten signature in blue ink, appearing to read "Chris Meincke", with a stylized flourish at the end.

Chris Meincke
Associate

+1 248 893-3402
chris.meincke@ghd.com

CJM/mg/LTR-11

Encl: Attachment A – 2nd Semi-Annual 2023 Progress Report

Copy to: Oonagh McKenna, EGLE
William Burbidge, GLWA
Grant Trigger, RACER
Pam Barnett, RACER
Brendan Mullen, RACER
Dave Favero, RACER
Jeff Crum, Hamp, Matthews & Associates

Attachment

Attachment A

2nd Semi-Annual 2023 Progress Report

Attachment A

2nd 2023 Semi-Annual Progress Report Performance-Based Administrative Order on Consent Eckles Road Site, Livonia, Michigan July 1, 2023 to December 31, 2023

1. Description of Work Completed

- Continued operation of the Area 1 southern French Drain Collection Trench and Groundwater Treatment system (GWTP). GLWA has been updated on operations and required effluent samples were collected and reported to GLWA. During the second half of 2023 the system collected and discharged 670,881 gallons of groundwater. Monthly discharge totals are presented in Table 1. Sump elevation control points for pump operation were adjusted in November 2023 to begin an evaluation of static groundwater elevations within the Area 1 barrier wall. The sump elevation controls points were adjusted from between 692.3 feet above mean sea level (ft. amsl) and 693.8 ft amsl to between 693.3 ft amsl and 695.3 ft amsl. The groundwater elevation within the sump has equalized to approximately 695.1 ft amsl through December 2023. A granular activated carbon change-out was completed on December 22, 2023. Groundwater elevation measurements were collected periodically from the French drain sump located within Area 1 and select monitoring wells. Continued periodic downloads of transducer groundwater elevation data from monitoring wells inside and outside the Area 1 Barrier Wall were conducted. Monitoring locations are provided on Figure 1.
- Participated in a virtual meeting with USEPA and EGLE on July 10, 2023 to discuss updates to the Groundwater Flow & Transport Model and Evaluation of the Infiltration Barrier.
- Received comments from USEPA via email on July 13, 2023 regarding the Summary of Area 1 Post-Construction Groundwater Monitoring Activities through June 2022 memorandum dated May 31, 2023.
- Submitted the 1st 2023 Semi-Annual Progress Report dated July 14, 2023, to USEPA.
- Received comments from USEPA via email on July 18, 2023 regarding the Summary of Liner Installation Technical Memorandum dated May 30, 2023.
- Participated in a Site meeting with USEPA on August 30, 2023 to tour the Area 1 and AOI 31 areas of the Site.
- Collected groundwater and soil gas samples from existing AOI 31 monitoring wells and soil gas probes during September 2023, as access to residential properties permitted.
- Submitted a semi-annual report to GLWA dated September 15, 2023, for the March 2023 to August 2023 reporting period.
- Completed Post-Construction and Interim Measure Performance Area 1 Groundwater Monitoring sampling activities September 18 to 22, 2023. Area 1 IM Performance monitoring well locations are presented on Figure 1.
- Submitted an application to GLWA on November 16, 2023 to renew Special Discharge Permit SD6-94508 for the discharge of treated groundwater. Following clarifications, GLWA issued a renewed Special Discharge Permit dated December 15, 2023, effective January 1, 2024, and expiring December 31, 2024.
- Submitted a Summary of Off-site Groundwater and Storm Sewer Sampling Activities to USEPA and EGLE dated November 16, 2023.
- Received comments from USEPA via email on December 15, 2023 regarding the Summary of Off-site Groundwater and Storm Sewer Sampling Activities dated November 16, 2023.

- Submitted a signed 2024 Annual Environmental Action Budget Request to USEPA on November 29, 2023. USEPA approved the 2022 Annual Environmental Action Budget Request on December 6, 2023.
- Submitted a Summary of Area 1 Groundwater Monitoring Activities (June 2022 through May 2023) to USEPA and EGLE dated December 22, 2023.
- Submitted a *Eckles Road Off-Site Residential AOI 31 – Vapor Intrusion Pathway Monitoring Work Plan; Proposed Groundwater and Soil Vapor Sampling Strategy for a TCE Plume* dated June 30, 2023 to USEPA and EGLE.
- Submitted a *Eckles Road Off-Site Residential AOI 31 – Vapor Intrusion Pathway Monitoring Work Plan Phase 1: Proposed Summer Groundwater and Soil Vapor Sampling Strategy* dated August 8, 2023, to USEPA and EGLE.
- Received comments from USEPA via email on August 18, 2023, regarding the *Vapor Intrusion Pathway Monitoring Work Plan Phase 1: Proposed Summer Groundwater and Soil Vapor Sampling Strategy*, dated August 8, 2023.
- Participated in a site meeting August 30th with USEPA, RACER and GHD for a site walk-through and in-person meeting at a residents home to facilitate future frequent (seasonal) VI pathway monitoring activities.
- Submitted a revised *Eckles Road Off-Site Residential AOI 31 – Vapor Intrusion Pathway Monitoring Work Plan Phase 1: Proposed Summer Groundwater and Soil Vapor Sampling Strategy* dated September 5, 2023, to USEPA and EGLE.
- Installed two soil vapor implants at Home 23 September 15, 2023.
- Received USEPA comments September 22, 2023 to facilitate and support HMA preparation of a Phase 2 VI Work Plan. To this correspondence USEPA attached a July 28, 2023 Letter from EGLE with Subject “Comments on RACER Eckles Road AOI 31: Vapor Intrusion Work Plan, Revitalizing Auto Communities Environmental Response (RACER) Trust; Eckles Road; Livonia, Michigan”.
- Prepared a *Draft Resident Fact Sheet - Eckles Road Off-Site Residential AOI31* on September 26, 2023 to USEPA for review and comment for the purpose of attaching to resident access request letters. USEPA agrees to revisions to the fact sheet via email October 10, 2023.
- RACER provides edits to fact sheet and revisions completed December 4, 2023, and access letters and fact sheet sent to residents December 22, 2023.
- Participated in virtual meetings with USEPA on July 31, August 14, August 28, September 25, October 23, and November 27 to discuss strategy and work plan documentation for “phased” seasonal VI pathway assessment and TCE plume extent for AOI 31, and development of a Quality Assurance Project Plan for soil gas data collection and analysis.
- Submitted a *Eckles Road Off-Site Residential AOI 31 Vapor Intrusion Pathway Monitoring Work Plan Phase 2: Proposed Groundwater Extent and Soil Vapor Sampling Strategy*, dated December 1, 2023.
- Conducted an inspection and performance evaluation of the Home 7 and Home 8 vapor mitigation systems December 15 and 29, 2023.

2. Data Collected

- A Summary of Monthly Groundwater Treatment Plant Discharge Volumes is provided in Table 1.
- A summary of off-site groundwater and stormwater sample results was included in the Summary of Off-site Groundwater and Storm Sewer Sampling Activities dated November 16, 2023.

- A summary of groundwater elevations and sample results associated with the Area 1 Construction/Performance Monitoring activities through May 2023 was included in the Summary of Area 1 Groundwater Monitoring Activities dated December 22, 2023.
- Emailed soil vapor sample results from September 2023 Phase 1 VI sampling event to USEPA on September 15, 2023.
- Emailed groundwater sample results from September 2023 Phase 1 VI sampling event to USEPA on September 16, 2023.
- Problems Encountered None.

3. Problems Encountered

- None.

4. Estimated Percent Complete and Information Summary for Selected Activities

- O&M of the Groundwater Pump & Treat System (GWTP, Barrier Wall, Cover) 48%
Continued operation of the Area 1 French Drain Collection Trench and Groundwater Treatment system on an as-needed basis. Chromium VI and nickel treatment is no longer required to discharge to the sanitary sewer under GLWA special discharge permit. GAC installed to treat PFOS. Submitted appropriate discharge reports as per the Special Discharge Permit. (Although not applicable to the current Site remediation strategy, percent complete is estimated as 13 years complete of 27 years estimated in the May 2010 RCES. This metric will be re-evaluated as the interim measures for Area 1 are evaluated and modified as approved by USEPA.) Also see below item - PFAS Remedy/Interim Measure Operation, Maintenance, and Monitoring.
- Long-Term Groundwater Monitoring On-going
Long-Term Groundwater Monitoring Plan proposed 5 years of monitoring to verify continued stability/reduction in off-Site/boundary concentrations (anticipated completion 2006 through 2010). Sampling activities are currently planned to continue pending USEPA approval to cease monitoring. Also see below item - PFAS Remedy/Interim Measure Operation, Maintenance, and Monitoring.
- Maintenance of the AOI 39 Dust Control Plan 100%
- Restrictive Covenants 100%
Prepared a revised Declaration of Restrictive Covenant (DRC) and Termination of the 2007 DRC and submitted to USEPA on June 25, 2015. Recorded revised DRC and 2007 DRC Termination on August 26, 2015. A DRC for the southwest portion (Area 1) was recorded on April 9, 2019. First Amended and Restated Declaration of Restrictive Covenant was recorded on May 12, 2021 for the southwest portion of the Site (Area 1).
- Vapor Intrusion Investigation 100%
Vapor Intrusion Investigation has been completed and subsequent mitigation has been implemented at two residences, and a VI pathway sampling plan downgradient of previously investigated homes has been approved and is being implemented. See AOI 31 below for additional activities.

- Installation of Vapor Mitigation System 100% (Two homes)

Installation completed and system operational at one home since September 2012. Installation completed and system operational at a second home since January 2018.

- O&M and Performance Monitoring of Vapor Mitigation System On-going System performance monitoring is being implemented annually. Latest system performance monitoring completed December 2023 at two homes.
- Area 1 Pilot Tests - Alternative Chemicals & Target In-Situ Treatment Injection 100%

Objective was to design, implement, and evaluate a pilot test to use alternative chemicals in the wastewater treatment process that could reduce treatment system operating time and/or operating costs. Also, design and implement an in-situ stabilization treatment in Area 1 that could also reduce treatment system operating time and long-term monitoring duration.

The groundwater treatment plant optimization activities were not conducted due to health and safety concerns associated with handling, storing, and mixing the proposed replacement chemicals.

The Area 1 field pilot test was conducted in November and December 2010. Based on an evaluation of the pilot test results, additional pilot study injection and monitoring activities were recommended to determine if full-scale on-site implementation would significantly reduce dissolved concentrations of chromium and nickel and allow for the groundwater treatment plant activities to be reduced or eliminated.

Additional cost and remedial alternative evaluations were performed in 2013. Additional Area 1 Characterization activities have been implemented. A laboratory treatability study was performed using site groundwater to evaluate the effectiveness of utilizing a permeable reactive barrier wall (PRB) with zero valent iron (ZVI) to treat Area 1 groundwater if the existing groundwater collection and treatment system operations are ceased. Groundwater modeling activities were also performed to evaluate the optimal location and number of PRBs and the effects on groundwater flow inside and outside of the Area 1 Barrier Wall.

An additional field pilot test injection was completed in November 2013 and monitoring activities were completed through October 2014 with expanded pilot injections in the northern portion of the Area 1 chromium and nickel-impacted groundwater plume proposed in the 2015 Annual EA Budget Request.

Additional expanded pilot study injections were completed in May through June of 2015 including the injection of sodium sulfide, sodium dithionite, or a combination of the two in 83 injection points in the northern portion of the Area 1 chromium and nickel-impacted groundwater plume. Groundwater monitoring concluded in December 2015. An Area 1 ISCR Pilot Study Summary Report was submitted in January 2016.

- Groundwater Treatment System Decommissioning & Removal 100%

Anticipated to be completed in 2037 per May 2010 RCES but was implemented in 2021 to support the Area 1 interim measure. The existing French drain collection system was retained, and the treatment system was re-located/upgraded as a contingency to the interim measure.

- Completion Report & Well Abandonment 0%

Anticipated to be completed in 2037 per May 2010 RCES but this is likely to change given the interim measure being implemented for Area 1.

- AOI 31 Long-Term VI Pathway Monitoring and Groundwater TCE Remediation 50%

A Long-Term VI Pathway Monitoring Work Plan was approved May 2016 which included a minimum two years of semi-annual/annual soil vapor and groundwater sample collection to evaluate groundwater plume stability, downgradient extent of the groundwater and soil vapor TCE plume, and spatial and temporal variability in TCE soil vapor concentrations. The first semi-annual event was conducted in June 2016.

Based on the results of the first event, additional groundwater delineation activities (Phase I Geoprobe®) were completed during the 1st Quarter of 2017 to further delineate TCE and TCA groundwater plumes and concentrations to determine if modifications are needed to the VI pathway monitoring plan, or if response actions are needed to mitigate potential unacceptable VI risk. Additional permanent monitoring wells and soil vapor probes were installed in June 2017 and were sampled in July 2017, as well as in 2018, 2019, 2020, 2021, and 2022 in coordination with the annual Groundwater Monitoring Program. Subslab soil vapor probes at two homes were resampled in December 2017. Soil vapor samples were collected November/December 2018, December 2019, December 2020, December 2021, and November/December 2022. Preparation of a Long-Term VI pathway risk summary report based on VI sampling results from 2016 through 2021 will be prepared and is anticipated to be submitted as a draft report in January 2023.

Groundwater and soil diagnostic sample and hydraulic data were collected June and October 2018 to assist design of an In-Situ Groundwater Remediation of the TCE plume to lessen vapor intrusion pathway risk assessment and mitigation activities in the future at homes downgradient of the plume's current extent. A Draft Work Plan for In-Situ Chemical Oxidation Remediation of TCE at AOI 31 dated June 13, 2019, and revised August 23, 2019 was submitted to USEPA. USEPA submitted technical review comments on March 10, 2020 which are currently under review by RACER.

Per USEPA's approval of the November 16, 2020 scope of work, groundwater monitoring wells MW-103R and MW-202R, as well as soil gas well SG-1R were replaced and sampled in January/February 2021 due to construction-related damage. Soil gas and groundwater samples were collected in December 2021 and December 2022. Sample results will be used to refine the TCE vapor source conceptual site model. Refinement of the vapor pathway CSM in the area downgradient of the southeast corner of the former Site is also under current consideration.

A revised draft Vapor Intrusion Pathway Monitoring Work Plan (Proposed Groundwater and Soil Vapor Sampling Strategy) for the Off-Site Residential AOI 31, dated June 30, 2023 is under review by USEPA and EGLE. USEPA elected to implement VI monitoring in a "phased approach" to obtain seasonally representative VI data. USEPA approved a revised Phase 1 VI Work Plan for summer groundwater and soil vapor sample collected, which was implemented early September 2023. The results did not necessitate any near-term VI response activities. A Phase 2 VI Work Plan is currently under USEPA and EGLE review to facilitate a winter 2024 VI sampling event to continue with assessment of seasonal variability in VI pathway conditions.

– Area 1 Remedial Implementation – Metals 100%

A request to perform Targeted Area 1 ISCR Injections was submitted to USEPA in April 2016 and approved by USEPA on May 18, 2016. Targeted injections were implemented in August 2016. An Area 1 Full Scale ISCR Work Plan was submitted to USEPA in April 2016 and approved by USEPA on May 18, 2016. Implementation of the work plan activities began September 2016. ISCR injections were completed in November 2016. Performance groundwater monitoring following the ISCR injections was completed in January 2017 and April/May 2017.

An Area 1 Permeable Reactive Gate Evaluation report was submitted to USEPA in September 2017 proposing to install a permeable reactive gate (PRG) along a portion of the eastern alignment of the Area 1 Barrier Wall, to allow groundwater to exit the area surrounded by the barrier wall while being passively treated. An Area 1 Permeable Reactive Gate Work Plan was submitted to USEPA in April 2018. Comments received from USEPA were addressed. The presence of PFAS-impacted groundwater within the Area 1 Barrier wall put implementation of the PRG on hold while the impacts of PFAS being present were evaluated.

Follow-up targeted injections were conducted in December 2017 along the south and southeastern alignments of the Area 1 Barrier Wall (in the vicinity of French drain collection trench and proposed PRG location, where injections had not previously been conducted). Follow-up groundwater monitoring activities were completed in January 2018 and May 2018. Additional groundwater monitoring activities were completed in October 2019. Two additional injections with sodium dithionite were conducted in December 2019 northwest of the field pilot study injection locations. Additional groundwater monitoring activities were completed in October 2020 and January/February 2021.

An interim measure integrating an impermeable cap with development of Area 1 was implemented in 2021 and the first half of 2022.

- Area 1 PFAS and Metals Characterization 90%

Initial groundwater samples were collected during 2017/2018 to evaluate the potential presence of PFAS-impacted groundwater at the Site. PFAS has been detected in groundwater samples within the former Plating Area and GWTP influent/effluent samples at concentrations greater than the USEPA's 2016 Lifetime Health Advisory of 70 ng/L for PFOA and PFOS. Additional characterization activities were completed in 2019 to evaluate horizontal and vertical extents of PFAS-impacted groundwater within Area 1, and how it may impact potential Area 1 remedies. Additional characterization activities to further evaluate shallow PFAS impacted groundwater were conducted in the northern portion of Area 1 in May 2020. Additional characterization activities were conducted in October 2020 to further delineate shallow PFAS-impacted groundwater in the northern and western portions of Area 1, and outside the southern alignment of the Area 1 Barrier wall. Additional site characterization groundwater samples were collected from on-site monitoring wells in 2021. Construction monitoring and performance monitoring groundwater samples were collected from on-site monitoring wells in 2022 and 2023.

Off-site characterization of PFAS and metal groundwater impacts was advanced in January/February 2021 through the collection of groundwater grab samples through drilling equipment. Additional monitoring well installation and groundwater sampling activities were proposed to and approved by USEPA. Two additional monitoring well pairs were installed in December 2021, the remaining proposed monitoring well pair was installed in February 2022. MW-OS-17S/D were inadvertently installed slightly outside of the right-of-way and were abandoned during March 2022 to accommodate planned construction activities of the property owner. Off-Site groundwater samples were collected in February and March/April 2022. A summary of the off-site groundwater and storm sewer sample results was submitted to USEPA and EGLE in November 2023. An additional off-site groundwater and storm sewer sampling event is planned for the first quarter of 2024.

- PFAS Remedy/Interim Measure Evaluation 95%

Potential remedial alternatives to address PFAS-impacted groundwater within Area 1 have been reviewed and summarized. The evaluation was updated per comments from USEPA and resubmitted. An interim measure has been implemented to integrate an impermeable cap with development of Area 1. Additional Remedy/Interim Measure Evaluation activities are being conducted to evaluate the effectiveness of the implemented interim measure.

- PFAS Treatability Pilot Tests 100%

A USEPA approved Scope of Work for a laboratory treatability study has been completed to evaluate several media to evaluate their effectiveness treating PFAS-impacted groundwater. Results were summarized and submitted to USEPA on September 30, 2019 (Additional Permeable Reactive Barrier Treatability Study, GHD, September 30, 2019).

- PFAS Remedy/Interim Measure Design 100%

Design of a cap integrated with development of Area 1 has been developed and implemented. The interim measure incorporates capping and development to reduce infiltration and eliminate/minimize the need for

ongoing groundwater treatment/operation and maintenance activities. An Interim Measures Work Plan was submitted to USEPA for review in December 2020. Comments from USEPA were received and were addressed in a Revised Interim Measures Work Plan which was submitted to USEPA on July 20, 2021 and approved by USEPA on September 29, 2021.

- PFAS Remedy/Interim Measure Implementation 100%

Installation of the cap (a high-density polyethylene liner [HDPE] liner and drainage layer) and cover materials, and construction of a new building, parking and truck dock areas is complete. Interior building slab and finishes were completed during the 1st half of 2022. Installation of pump, controls, and piping for the contingency North French Drain System is pending evaluation of the performance groundwater monitoring results.

- PFAS Remedy/Interim Measure Operation, Maintenance, and Monitoring TBD

The previous groundwater treatment plant (GWTP) was supplemented with granular activated carbon in April 2020 to remove PFAS from collected groundwater. Groundwater was collected and treated by the GWTP on an as-necessary basis (responding to precipitation events and generally maintaining the groundwater within the Area 1 Barrier Wall at depths greater than 3 feet bgs) from December 2018 through January 2021 to manage groundwater elevations within the Area 1 Barrier Wall. Since February 2021 groundwater has been collected and treated on an on-going basis. Certain groundwater treatment components were removed from the former GWTP building and relocated into a Conex box. New pump and control components were installed as part of the Interim Measure implementation activities in 2021. Construction monitoring and interim measure performance monitoring groundwater samples were collected from on-site monitoring wells in 2021, 2022, and 2023. O&M tasks are anticipated to change based on implementation and evaluation of the interim measure. A plan for ongoing O&M will be developed after an evaluation of the Interim Measure performance monitoring and groundwater elevation monitoring is completed.

5. Summary of Contacts with Interested Parties

- Correspondence with GLWA regarding Special Discharge Permit activities and required reporting.
- Residents are updated on a one-on-one basis to maintain privacy of VI pathway risk evaluations at their homes.
- Property owners south of Area 1 are updated on a one-on-one basis for access to sample monitoring wells.

6. Changes in Personnel

- None.

7. Projected Work for Next Reporting Period (January 2024 through June 2024)

- Continue performance groundwater monitoring activities and reporting.

- Continue to work with USEPA and EGLE to address Area 1 impacts and with GLWA to address any discharge issues.
- Continue monitoring groundwater elevations and operation of the Area 1 French Drain Collection Trench and Groundwater Treatment system in accordance with the approved Construction Groundwater Monitoring Plan and Revised Interim Measures Work Plan – Area 1. Initiate a pilot study to temporarily cease groundwater pumping operations and monitor groundwater elevations inside and outside of the Area 1 Barrier Wall.
- Present a summary of the updated groundwater flow model and infiltration barrier evaluation to USEPA and EGLE and prepare a memo documenting updates to the model. A conclusion to be included in this memo is that continued operation of Area 1 French Drain Collection Trench and Groundwater Treatment system is not needed to meet project objectives. Therefore, it is expected that based on the evaluation to be provided in this memo, operation of the Area 1 French Drain Collection Trench and Groundwater Treatment system will be stopped beginning February 1, 2024 to allow for monitoring to collect data to assess the conclusions of the evaluation.
- Prepare a technical memo to provide a summary and evaluation of Area 1 Construction/Performance Monitoring data through the first quarter of 2024.
- Conduct off-site groundwater and storm sewer sampling activities proposed in the Summary of Off-site Groundwater and Storm Sewer Sampling Activities dated November 16, 2023 and prepare a summary of the off-site groundwater monitoring results.
- Review proposed Area 1 groundwater management strategies with USEPA and prepare a Long-Term Operations, Maintenance & Monitoring Plan, if appropriate.
- Implement seasonal soil vapor and groundwater sampling (Winter, Spring and Summer of 2024) in accordance with approved Vapor Intrusion Pathway Monitoring Work Plans (Proposed Groundwater and Soil Vapor Sampling Strategy) for the Off-Site Residential AOI 31.
- Continue to consider an interim measure/remedy to mitigate the potential for a future complete VI pathway for off-site AOI 31 receptors. Additional data collection is anticipated to be necessary to develop a proposed remedial technology.
- Prepare summaries of meetings, data reviews, or conference calls with USEPA, as appropriate.
- Prepare this 2nd 2023 Semi-Annual Progress Report.

Attachments: Table 1 – Summary of Monthly Groundwater Treatment Plant Discharge Volume
Figure 1 – Construction and Performance Monitoring Locations

**Summary of Monthly Groundwater Treatment Plant Discharge
Area 1 - Former Plating Area
Eckles Road Site
Livonia, Michigan**

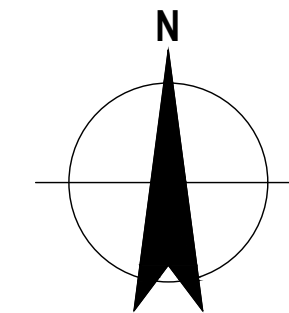
Monthly GWTP Discharge Volume (Gallons)	
Month	
July 2023	173,342
August 2023	161,138
September 2023	152,573
October 2023	145,317
November 2023	36,908
December 2023	1,603
Total July 2023 to December 2023 Discharge	670,881

Notes:



- LEGEND
- AREA BARRIER WALL
 - FRENCH DRAIN
 - GWTP DISCHARGE LINE
 - EXTENTS OF FORMER PRESS PIT BASEMENT
 - STORMWATER SEWER LINE
 - SITE BOUNDARY
 - SANITARY LINE
 - FENCE
 - MW-A2-2S EXISTING MONITORING WELL / PERFORMANCE MONITORING LOCATION
 - MW-A2-2S EXISTING MONITORING WELL / CONSTRUCTION MONITORING LOCATION
 - MW-A2-2S EXISTING MONITORING WELL / CONSTRUCTION AND PERFORMANCE MONITORING LOCATION
 - JET-GROUTED BARRIER WALL

0 25 50 ft



RACER TRUST
ECKLES ROAD SITE
LIVONIA, MICHIGAN

CONSTRUCTION MONITORING LOCATIONS
PERFORMANCE MONITORING LOCATIONS
AREA 1 INTERM MEASURE COMPONENTS

Project No. 12573440
Date July 2023

FIGURE 1