



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
LANSING



DAN WYANT  
DIRECTOR

November 15, 2012

Mr. David Favero  
Deputy Cleanup Manager - Michigan  
RACER  
2930 Ecorse Road  
Ypsilanti, Michigan 48198

Dear Mr. Favero:

SUBJECT: Resource Conservation and Recovery Act of 1976 (RCRA) Facility Investigation (RFI) Work Plan (Work Plan); Former GM Romulus Engineering Center; MID 000 809 905

This letter is in response to the Work Plan that was submitted by Mr. Derek C. Kaiding, P.E., of Haley & Aldrich of Michigan, on behalf of the Revitalizing Auto Communities Environmental Response (RACER) Trust. The Work Plan was received by the Department of Environmental Quality (DEQ) on September 26, 2012. The Work Plan was accompanied by a separate RFI Field Sampling Plan and a separate Quality Assurance Project Plan.

As part of a former hazardous waste treatment, storage, or disposal facility, the above-referenced facility is subject to the corrective action requirements of Part 111, Hazardous Waste Management, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended, and its rules. These corrective action requirements adopt by reference the environmental protection standards established under Part 201, Environmental Remediation, of Act 451.

Based on a review of the Work Plan; information contained in the DEQ, Office of Waste Management and Radiological Protection (OWMRP) facility files; and Part 111 and its administrative rules, the OWMRP hereby approves the work outlined in the Work Plan subject to the following modifications:

1. **Sections 2.2 RFI Approach and 2.3 Sampling and Analysis Plan for Soil and Groundwater:** Screening tools, such as the use of a photoionization detector (PID), may be used to guide decisions regarding sample collection locations and subsequent laboratory analyses if a release is suspected or evidence of a release exists. Under these circumstances, however, final decisions regarding the nature and extent of contamination relative to the applicable environmental protection standards shall be based on analytical laboratory data.

2. **Section 2.3 Sampling and Analysis Plan for Soil and Groundwater:**

- A. In evaluating the absence or presence and nature and extent of contamination, it is necessary to compare media-specific data to the appropriate environmental protection standards. That being said, it is not acceptable to base a decision regarding corrective action obligations for all media at a given location on the results of borehole groundwater observations or data alone.
- B. Page 6 of the Work Plan suggests that the borehole water and groundwater samples will be analyzed for target compound list (TCL) polycyclic aromatic hydrocarbons (PAHs). Page 7 of the associated RCRA RFI Field Sampling Plan uses the term "and/or" when referring to TCL PAHs, suggesting that samples may not be analyzed for these parameters. Borehole water and groundwater samples shall be analyzed for TCL PAHs if a release is suspected or evidence of a release is observed and the respective waste management unit (WMU) managed waste that contained the PAHs.

3. **Section 3.5.2 Quantitative Data Review:** Two options exist for evaluating metals data. First, RACER Trust may do a comparison to the state default background criteria that are contained in the environmental protection standards referenced above. Second, site-specific background values may be established. Site-specific background values require approval by the OWMRP. Use of published data appropriate to the regional in which the site is located is not acceptable.

4. **Section 4 Reporting:**

- A. Within 30 days of initiation of the activities outlined in the Work Plan, RACER Trust shall submit a progress report to the OWMRP, Hazardous Waste Section. Progress reports shall be submitted every 90 days thereafter until submission of the RFI Report.
- B. Both Sections 3.5.2 Quantitative Data Review and 3.6 Use of Investigation Data refer to a restrictive covenant to limit the site to commercial/industrial uses and prevent any future use of the groundwater at the site. It is recommended that a draft covenant be included in the report should the cleanup category selected remain unchanged such that restrictions will apply.
- C. The RFI Report(s) shall be signed and certified in accordance with Title 40 of the Code of Federal Regulations, Section 270.11(d), which is adopted by referenced in the Part 111 rules.
- D. Two hard copies and an electronic copy of the RFI Report(s) shall be submitted to the OWMRP.

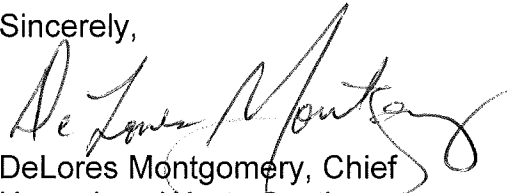
5. **General:**

A. RACER Trust shall provide the OWMRP with at least three business days advance notice of any sampling activities associated with this Work Plan.

B. Any deviations from the approved Work Plan require prior approval by the OWMRP.

If you have any questions, please contact Ms. Ronda L. Blayer, Environmental Engineering Specialist, Hazardous Waste Section, OWMRP, at 517-373-9548; blayer@michigan.gov; or DEQ, OWMRP, P.O. Box 30241, Lansing, Michigan, 48909-7741, or you may contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "DeLores Montgomery", is written over the typed name and title.

DeLores Montgomery, Chief  
Hazardous Waste Section  
517-373-9875

cc: Mr. Grant Trigger, RACER  
Mr. Joe Cisneros, U.S. Environmental Protection Agency, Region 5  
Mr. Derek C. Kaiding, P.E., Haley & Aldrich  
Ms. Jeanette Noechel, DEQ  
Mr. Jack Schinderle/Ms. Ronda L. Blayer, DEQ  
Corrective Action File