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Subject:

Well Abandonment Request
Pontiac North Campus

ENVIRONMENT

Dear Mr. Nemani:

Date:
May 4, 2017

Arcadis of Michigan, LLC (Arcadis), on the behalf of Revitalizing Auto Communities Environmental Response Trust (RACER) Trust is requesting approval to permanently abandon 32 regular and 18 temporary monitoring wells near the Former Plant 14 South (Area of Interest [AOI] M-2) and former railroad marshalling area west of the existing United States Postal Service (USPS) facility at the Pontiac North Campus facility (the Site; **Figure 1**). It is believed that these wells are no longer needed and abandoning these wells will help facilitate development of the property. Seven monitoring wells will remain (or be properly abandoned to allow for development in the area and then re-installed) as indicated on **Figure 1**.

Contact:
Christi Kiker

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Our ref:
B0064607.2017.00002

All wells proposed for abandonment were installed as part of the following Site Resource Conservation and Recovery Act (RCRA) investigation activities:

- MWM/MWW-series wells – regular wells installed as part of the Site RCRA Facility Investigation (RFI) from 2001 to 2007
- TWM-series wells – regular wells installed as part of light non-aqueous phase liquid (LNAPL) evaluation activities conducted in 2013 and 2014
- SB-series wells – temporary wells installed as part of polychlorinated biphenyl (PCB) delineation activities in 2014 and 2015

Historically, volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), inorganic metals, and PCBs have been detected in groundwater collected from these monitoring wells at concentrations above the 2013 Michigan Department of Environmental Quality (MDEQ) Part 201 generic cleanup criteria for residential and non-residential drinking water and

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groundwater-surface water interface. However, monitoring over the past fifteen years indicates that constituent concentrations are either stable or trending downward.


All wells identified on **Figure 1** were gauged in March 2017. A summary of gauging activities is provided on **Table 1**. No significant changes in water or product level measurements were observed. LNAPL continues to be observed in several of these monitoring wells, but is considered stable and not migrating. All soil, groundwater and LNAPL data collected from the wells proposed for abandonment have been utilized to refine the conceptual site model and update the remedial alternatives being evaluated during the on-going update to the Corrective Measures Study (CMS) for the Site. These wells are not currently sampled as part of the annual groundwater monitoring program at the Site, and it is not anticipated that they are needed for any future data to support the CMS or for post-completion long-term groundwater monitoring program. In addition, the temporary monitoring wells installed during 2014/2015 PCB delineation activities were to be abandoned after a monitoring period of 6 months after installation.

Based on the above discussion RACER Trust is requesting approval to properly abandon the monitoring wells in place following guidance provided by MDEQ. Monitoring wells will be abandoned by a State of Michigan-licensed well driller with Arcadis oversight. Upon abandonment, a monitoring well/soil boring log will be prepared to document that the well was properly abandoned and a summary of the effort will be submitted to USEPA.

Please let us know if you have any questions.

Sincerely,

Arcadis of Michigan, LLC



Christi Kiker
Principal Engineer, CPM

Copies:
David Favero, RACER Trust

Attachments:

Table 1 – Parcel 14 20 276 001 Groundwater Elevation Summary, March 2017
Figure 1 – Proposed Well Abandonment Locations

Table 1
Parcel 14 20 276 001 Groundwater Elevation Summary, March 2017
RACER Trust Pontiac North Campus

Well ID	Well Elevation ¹	Total Depth (ft)	Depth to Water (ft)	Depth to LNAPL (ft)	Groundwater Elevation	LNAPL Thickness (ft)	Equivalent Groundwater Elevation ²	Comments
Parcel 14								
MWM1-04	970.25	27.87	19.06	NA	951.19	---	---	
MWM2-04	967.68	NA	NA	NA	NA	---	---	Well submerged
MWM2-06	967.72	24.01	16.46	NA	951.26	---	---	Vault cover missing
MWM2-07	967.60	25.57	16.13	NA	951.47	---	---	
MWM2-08	967.56	25.41	16.90	NA	950.66	---	---	
MWM2-18	967.59	28.36	16.24	NA	951.35	---	---	Vault cover missing
MWM2-19	967.75	25.70	16.44	NA	951.31	---	---	Vault cover and J-Plug missing
MWM2-20	967.30	28.05	16.01	NA	951.29	---	---	Vault cover missing
MWM2-22	967.56	21.25	15.99	NA	951.57	---	---	
MWM2-23	967.61	NA	NA	NA	NA	---	---	Well destroyed
MWM2-24	967.36	NA	NA	NA	NA	---	---	Well destroyed by tree
MWM2-28	967.70	23.00	15.38	NA	952.32	---	---	
MWM2-29	967.63	NM	44.84	43.44	922.79	1.40	923.07	
MWM2-33R	967.55	52.61	45.50	NA	922.05	---	---	
MWM2-35	967.55	54.72	45.52	NA	922.03	---	---	Vault cover missing
MWM2-36	967.59	55.18	45.77	NA	921.82	---	---	
MWM2-37	967.58	NA	NA	NA	NA	---	---	Well submerged
MWM2-38	967.49	64.69	45.79	NA	921.70	---	---	Vault cover missing
MWM2-40	967.43	NA	NA	NA	NA	---	---	Well destroyed
MWM2-41	967.51	58.10	45.68	NA	921.83	---	---	
MWM4	976.21	NA	NA	NA	NA	---	---	Well filled with dirt
MWW10-01	963.75	NM	10.60	9.65	953.15	0.95	953.34	
MWW10-03	958.20	13.65	9.68	NA	NA	---	---	
MWW10-04	961.49	17.76	9.08	NA	952.41	---	---	
MWW10-05	963.98	NM	10.75	4.59	953.23	6.16	954.46	
MWW10-06	963.98	18.45	14.82	NA	949.16	---	---	
MWW10-07	967.11	NM	7.80	7.24	959.31	0.56	959.42	Padlock cut off to access well
MWW10-08	967.01	NM	8.81	7.52	958.20	1.29	958.46	Padlock cut off to access well
MWW10-09	966.81	16.17	6.36	NA	960.45	---	---	
MWW1-01	963.65	NM	4.09	4.07	959.56	0.02	959.57	
MWW1-04	944.20	13.24	4.78	NA	939.42	---	---	
SB-06A-14 (D)	970.33	NM	9.22	9.13	NM	NA	NA	
SB-06B-14 (S)	970.67	10.01	5.76	NA	964.91	---	---	
SB-07A-14 (D)	971.12	NM	19.85	19.83	951.27	0.02	951.28	
SB-07B-14 (S)	971.12	NM	11.26	11.22	959.86	0.04	959.87	
SB-08-14	965.97	NM	21.66	12.39	944.31	9.27	946.16	
SB-09-14	967.87	NM	23.33	14.33	944.54	9.00	946.34	
SB-10-14	967.08	NM	17.86	13.44	949.22	4.42	950.11	
SB-11-14	970.97	27.81	7.43	NA	963.54	---	---	
SB-12-14	970.69	28.01	19.41	NA	951.28	---	---	
SB-26-14	966.54	NM	14.91	13.28	951.63	1.63	951.95	
SB-35-14	966.41	24.60	13.07	NA	953.34	---	---	
SB-36-14	965.07	19.95	11.35	NA	953.72	---	---	
SB-37-14	966.91	18.40	10.68	NA	956.23	---	---	
SB-67-14	966.78	32.70	17.38	NA	949.40	---	---	
SB-68-14	966.54	NM	23.13	16.58	943.41	6.55	944.72	
SB-70-14	970.25	32.75	18.96	NA	951.29	---	---	
SB-71-14	971.09	31.25	19.86	NA	951.23	---	---	
SB-72-14	970.97	33.55	19.73	NA	951.24	---	---	
TWM2-01	967.23	15.81	4.87	NA	962.36	---	---	
TWM2-02	967.52	NA	NA	NA	NA	---	---	
TWM2-03	967.76	NM	17.16	14.81	950.60	2.35	951.07	
TWM2-04	967.64	12.59	2.77	NA	964.87	---	---	
TWM2-05	967.69	NM	7.15	5.80	960.54	1.35	960.81	
TWM2-06	967.53	12.28	8.29	NA	959.24	---	---	
TWM2-07	967.59	NM	16.76	15.02	950.83	1.74	951.18	

Notes:

NA = not applicable
LNAPL = light non-aqueous phase liquid
ft = feet

Footnotes:

- 1 - Top of Casing Elevation is in feet National Vertical Geodetic Datum (1988).
- 2 - The equivalent groundwater (GW) elevation is calculated where LNAPL is present using the LNAPL surface elevation, the thickness of LNAPL and the approximate specific density of the LNAPL (0.8). The calculation is as follows:
$$\text{Equivalent GW elevation} = \text{LNAPL surface elevation} - ((1 - \text{specific density of the LNAPL}) \times \text{LNAPL thickness})$$
- 3 - Water levels collected on March 27 - 28, 2017.

