



The RACER Trust: Empowering America's Auto Communities

Livonia, MI

RACER Sites 11040 & 13020

Delco Chassis Industrial Land I & II
12950/13000 Eckles Road
Livonia, MI 48150

U.S. Environmental Protection Agency
ID No. MID 005 356 621

Updated July 2021

Site Description

Between 1954 and 1998, this 120-acre site was operated by various divisions of GM. Historically the former Delco Chassis Plant included 14 buildings comprising approximately 2.1 million square feet. The property is surrounded by industrial or commercial properties with the exception of a residential neighborhood, located southeast of the site.

The main plant was primarily used to manufacture springs and bumpers, but also performed metal stamping; heat treating; metal plating/finishing; and assembly. In addition, the site involved a number of support processes including industrial wastewater treatment; recycling of quench/lubricating oils; and degreasing/parts cleaning.

Environmental decommissioning of the former Delco Chassis Plant began in 1999 and continued through 2001. All on-site structures were removed in 2001, with the exception of concrete floor slabs under the former building and a groundwater collection and treatment system located in the southwest corner of the property.

Cleanup activities are performed by RACER Trust, with the approval and oversight of EPA Region 5. The Settlement Agreement that established RACER Trust set aside \$6.7 million for cleanup work.

Environmental History

The property has been subject to Resource Conservation and Recovery Act (RCRA) Corrective Action under EPA oversight beginning in October 2001. Since 2001 there have been more than 10 stages of investigation; several interim cleanup measures including removal of impacted soil from the former fire training area, powerhouse area, historical coal pile area, the former mudhouse area, and a small area under the north portion of the main building slab; and a groundwater collection trench and treatment system was installed to address nickel and chromium impacted groundwater at and in the vicinity of a former plating area (Area 1). In addition, a barrier wall was installed to supplement the groundwater collection system; and a groundwater monitoring program and

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institutional controls were implemented. It is also noted that groundwater impacted with low concentrations of trichloroethylene (TCE) is migrating on-site from an adjacent property to the northwest.

Institutional controls on the property consist of a Declaration of Restrictive Covenant (Restrictive Covenant) to limit the property to non-residential land uses; restrict the use of groundwater on-site; protect the existing subsurface barrier wall and surface features (approximately 15 acres in the southwest portion of the site); and require a dust control plan for earth-moving activities at approximately 2.5 acres in the northern portion of the property, if conducted for more than five consecutive days. An additional institutional control is the ordinance prohibiting the use of groundwater within the City of Livonia that was enacted in July 2009.

Ongoing activities are conducted pursuant to a Response to Comments and Final Decision issued by EPA on March 13, 2006, and a Performance-based Administrative Order on Consent (AOC) executed between RACER and EPA on September 29, 2011.

An investigation conducted in 2012 evaluated the potential that soil vapors were present above a narrow groundwater plume containing chlorinated volatile organic compounds (CVOCs), including TCE, that has migrated off-site to the southeast. Based on the results of the investigation and follow-up activities, and with the approval of EPA, vapor mitigation systems were installed in two homes. Monitoring of groundwater conditions is ongoing in the area.

RACER's initial assessment of the former plating area groundwater collection and treatment system in the southwest corner of the site suggested that it was necessary to evaluate alternatives to reduce long-term operation, maintenance and monitoring (LTOMM) costs. An evaluation of alternatives to reduce LTOMM costs led to the successful implementation of an in-situ chemical reduction (ISCR) technology for nickel and chromium and as a result further treatment of extracted groundwater for metals is no longer required to satisfy Great Lakes Water Authority (GLWA) Special Discharge Permit effluent requirements. However, collection and discharge to GLWA was still required to control the groundwater level within the slurry wall. To eliminate the need for further operation of the groundwater collection system, a permeable reactive gate (PRG) in the Area 1 barrier wall was proposed to passively treat residual nickel and chromium in groundwater as water exited the Area 1 barrier wall (Containment Area).

Before the PRG was installed per- and polyfluoroalkyl substances (PFAS) were detected in groundwater samples collected from within the containment area in January and April 2017. Additional groundwater characterization was performed in 2018 and 2019 and alternative remedies were assessed because the proposed PRG media (zero-valent iron) was not capable of treating PFAS. PFAS also has been detected in off-site groundwater south of the Containment Area.

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In 2019, RACER engaged in discussions with the developer who had acquired and developed the majority of the property to explore whether the developer was prepared to exercise its option to acquire Area 1. In response, the developer proposed constructing a new approximately 365,000 square foot building and associated facilities over the majority of the Containment Area. As a result, a capping remedy was evaluated because capping has the potential to reduce, if not eliminate, the need for any further collection and treatment of groundwater from within the Containment Area, would minimize LTOMM costs and integrate well with redevelopment of the property. In the first quarter of 2021 the developer purchased Area 1 and work began to integrate a high-density polyethylene (HDPE) cap with redevelopment (i.e., a building and related drives, parking and utilities) resulting in the complete capping of the entire Containment Area.

Next Steps

Future activities include: implement the HDPE cap/redevelopment over the Containment Area; continue operating and maintaining the groundwater collection trench and treatment system in the short term; operate and maintain groundwater collection if determined necessary; continue monitoring groundwater related to groundwater collection and the cap; continue evaluating PFAS in off-site groundwater south of the Containment Area; continue monitoring groundwater and soil vapor related to TCE impacts southeast of the property; evaluate possible remedial alternatives to address TCE impacts southeast of the property; and prepare documentation and work with EPA to finalize the status of the property as RCRA Corrective Action Complete with Controls.

Additional information on this site can be viewed at the RACER website at www.racertrust.org.

For More Information

RACER: Grant Trigger • 855-RACER-411 • gtrigger@racertrust.org
EPA Region 5: Jennifer Stanhope, P.E. • 312-886-0681 • stanhope.jennifer@epa.gov