



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
LANSING



PHILLIP D. ROOS
DIRECTOR

April 9, 2024

VIA EMAIL

Brendan Mullen, Cleanup Manager
RACER Trust
500 Woodward Avenue, Suite 2650
Detroit, Michigan 48226

Dear Brendan Mullen:

SUBJECT: Review of Vapor Intrusion Evaluation – Summary Supplement;
RACER Coldwater Road Landfill; MID 005 356 860; Waste Data
System Number 393431

The Michigan Department of Environment, Great Lakes, and Energy (EGLE), Materials Management Division (MMD), has reviewed the technical memo: *Vapor Intrusion Evaluation – Summary Supplement* (Memo), prepared by Ramboll for the RACER Coldwater Road Landfill (Site), dated January 26, 2024. The Memo was reviewed for compliance with the facility's Corrective Action Consent Order, WMD Order No. 64-05-92, effective October 29, 1992; the approved Post-Closure Plan; and Part 111, Hazardous Waste Management, and the applicable sections of Part 201, Environmental Remediation, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended, and the administrative rules promulgated pursuant to those parts.

Based on our review, the MMD agrees that no further action is required for the volatilization to indoor air pathway at this time. Your request to abandon the vapor monitoring points is approved. As specified in Section 4 of the Memo, the MMD understands that RACER will file a revised declaration of restrictive covenant (DRC) for the Site. The revised DRC shall include a soil vapor management provision prohibiting the construction and/or occupancy of any building or structure on the property unless such construction and/or occupancy incorporates an investigation and any engineering controls determined to be necessary to eliminate the potential for exposure to vapor phase contaminants or hazardous substances. Additionally, the revised DRC shall require MMD approval for the documentation of compliance with the soil vapor management requirements of the DRC. RACER must submit a revised draft DRC to MMD at EGLE-MMD-HWS@Michigan.gov within 30 days of receipt of this letter. Upon approval, MMD will assign the DRC a reference number for filing with the Genesee County Register of Deeds.

Brendan Mullen

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If you have any questions, please contact me at 517-281-7726; SanabriaN@Michigan.gov; or EGLE-MMD-HWS@Michigan.gov.

Sincerely,

Nicole Sanabria

Nicole Sanabria, Senior Geologist
Corrective Action Unit
Hazardous Waste Section
Materials Management Division
517-281-7726

cc: Clifford Yantz, Senior Hydrogeologist, Ramboll
Kevin Schneider, Environmental Scientist, Ramboll
Kimberly Tyson, EGLE
Dale Bridgford, EGLE
Joe Rogers, EGLE
Christina Hebert, EGLE
Corrective Action File