



The RACER Trust:

Empowering America's Auto Communities

Genesee Township, MI

RACER Site 11030

Coldwater Road Industrial Land North
6220 Horton Street
Genesee Township, MI 48458

Updated January 2024

Site Description

Located north of the RACER-owned Coldwater Road Industrial Land, the 116.89-acre parcel includes an approximately 20-acre closed Resource Conservation and Recovery Act (RCRA) landfill; vacant land; the former wastewater treatment plant (WWTP), which was decommissioned and removed in 1999; restored wetlands; storm water detention ponds; and a leachate accumulation facility, which stores accumulated leachate and other water removed from the landfill. The Property is zoned heavy industrial. The landfill has been closed since 1994; other RCRA units and solid waste management units (SWMUs) that were part of a 1992 Corrective Action Consent Order were closed between 1994 and 2003.

The landfill contains stabilized soil/sludge from the former WWTP affiliated with the neighboring Coldwater Road facility to the south, which ceased manufacturing operations in 1998.

Post-closure operation, maintenance and monitoring (OM&M) and environmental remediation of the Property are being performed by RACER Trust pursuant to RCRA, with the approval and oversight of the Michigan Department of Environment, Great Lakes and Energy (EGLE). The Settlement Agreement that established RACER Trust set aside \$5.7 million for these activities at this Property.

Environmental History

The landfill was closed in 1994 in accordance with a closure plan approved by the Michigan Department of Environmental Quality, as EGLE was formerly known. The landfill incorporates the following design features:

- Situated on a minimum of 10 feet of clay soil;
- The bottom liner system consists of two, 60-mil high-density polyethylene (HDPE) liners, separated by five feet of compacted clay. Each liner consists of a 60-mil HDPE layer, a geonet layer, and a filter fabric layer;

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- The cap system consists of three feet of clay, a 60-mil HDPE liner, a geonet, and filter fabric layer. The entire cap is covered by 18 inches of sand and six inches of topsoil planted with grass;
- The landfill contains six cells, each with a leak detection vault and a leachate collection sump. The leachate collection sumps are equipped with a pump and a leak detection system (LDS) for the connecting pipes that move leachate to the on-site leachate accumulation building;
- The leak detection alarm system is included in an auto-dial system with automatic notification to the operation and monitoring contractor and the appropriate chain-of-command;
- The leachate accumulation facility temporarily stores landfill leachate and water removed from the leak detection vaults. Liquids stored in the leachate accumulation tank are treated to remove perfluorooctane sulfonic acid (PFOS) and then discharged to the sanitary sewer in accordance with a sewer user permit;
- The leachate accumulation tank is a 15,000-gallon above-ground, fiberglass tank contained within a concrete secondary containment unit, housed inside the heated leachate accumulation facility and is equipped with automated level controllers.

OM&M activities at the site include:

- Landfill, property and LDS inspections;
- Quarterly landfill cap inspections;
- Monthly monitoring and leak detection vault dewatering;
- Leachate tank treatment and discharge;
- Responses to alarm conditions;
- Landscaping and vegetation control;
- Scheduled and unscheduled maintenance;
- Groundwater, leachate and LDS sampling;
- Reporting of monthly discharge summaries and annual inspection reports.

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In 2007, GM completed repairs to eliminate infiltration of groundwater and surface water into several leak-detection vaults. Between 2010 and 2012 there were additional actions taken to evaluate and repair the leak detection system. EGLE periodically inspects the landfill. Its last inspection was in October 2013, and the agency found the site in compliance with the approved post-closure OM&M plan.

In relation to the former WWTP area, samples from one groundwater monitoring well revealed trace levels of organics, though the level did not exceed regulatory standards, and samples from several groundwater monitoring wells revealed iron and manganese concentrations above drinking water standards but below site-specific background values. Additional groundwater investigation in this area was completed from 2012 through 2014 and a closure report for the former WWTP area was submitted to and approved by EGLE in 2015. Subsequent investigations to assess the potential for vapor intrusion of volatile organic compounds (VOCs) have been completed since 2018 and the assessment continues.

As much of the Property was used for activities related to former the WWTP, in late 2016 groundwater samples were analyzed for per- and polyfluoroalkyl substances (PFAS). Several additional investigations to assess PFAS impacts have been conducted since 2016, resulting in identification of PFOS as the primary PFAS of concern. Interim measures taken to address PFOS since 2017 include replacement of a private well and provision of a whole house treatment unit for PFOS removal for a residence near the northwest corner of the Property; bulkheading and plugging several storm water lines to prevent off-Property discharge of storm water containing PFOS; directing storm water runoff to and increasing the storage capacity of the on-Property storm water detention ponds; and obtaining a permit to allow for discharge of treated water from the ponds, which prevents off-Property discharge of PFOS above its water quality value and allows for management of the water levels in the ponds by periodically treating and discharging stored water.

Next Steps

Principal future remedial activities include continuing long term post-closure OM&M for the landfill; monitoring of storm water and groundwater; and periodically treating and discharging water from the detention ponds to prevent discharge of PFOS above its water quality value and allow for management of the water levels in the ponds.

In addition, it is expected that deed restrictions will be recorded that at a minimum limit use of the Property to nonresidential, prohibit use of groundwater, require soil vapor management, require contaminated soil management, and prohibit disturbing the landfill cover system unless a plan receives prior approval from EGLE and RACER.

More information on the site is available at the RACER website at www.racertrust.org.

For More Information

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