



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

October 17, 2022

VIA EMAIL

Mouhamed Musheinessh, President
Detroit Axle
2000 West 8 Mile Road
Ferndale, Michigan 48220

Dear Mouhamed:

SUBJECT: *Response to Comments and Addendum to the RCRA Interim Work Plan Investigation Report - Eastern Site Boundary*; Former Hayes Lemmerz; Ferndale, Michigan; MID 041 803 123; Waste Data System Number 395519

The Department of Environment, Great Lakes, and Energy (EGLE), Materials Management Division (MMD), has completed its review of the *Response to Comments, and Addendum to the RCRA Interim Work Plan Investigation Report - Eastern Site Boundary* (Response), dated August 16, 2022, and prepared by TRC Environmental Corporation (TRC) on behalf of Detroit Axle, for the former Hayes Lemmerz property located at 1600 West 8 Mile Road, Ferndale, Michigan. The Response was reviewed for compliance with Part 111, Hazardous Waste Management, of the Michigan Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (NREPA), and the administrative rules promulgated thereunder.

Based on our review, the Response is approved subject to the clarifications and conditions specified below.

1. While EGLE understands that in some situations, both total and filtered groundwater samples for metals analysis may be collected, the expectation is that total metals samples will be used for comparison to applicable cleanup criteria established under Part 201, Environmental Remediation, of the NREPA. In the event of high turbidity groundwater conditions in which turbidity will not reduce after all other field parameters have stabilized, EGLE is willing to consider the use of metals data from filtered samples on a case-by-case basis. Such situations, along with supporting information, should be called out and discussed in future sampling reports.
2. The collection of samples for carbon dioxide and methane analysis, as well as the recording of dissolved oxygen and photoionization (PID) detector readings must be reported with the soil-gas sampling results, as this information is useful in understanding the dynamics of the soil gas system.

3. Based on an August 31, 2022, phone conversation with Kelly Cratsenburg, Project Manager for TRC, EGLE understands that groundwater and soil gas data collected as part of this phase of the RFI will be compared to the current EGLE residential volatilization to indoor air (VIAP) screening levels. If it is apparent that site-specific VIAP criteria will be necessary to evaluate the VIAP for a given structure, then TRC will work with EGLE to get site-specific VIAP criteria developed and approved for that structure.

If you have any questions, please contact Joe Rogers, Geologist Specialist, Technical Support Unit, Hazardous Waste Section, MMD, at 517-599-5312, RogersJ5@Michigan.gov; or EGLE, MMD, P.O. Box 30241, Lansing, Michigan 48909-7741.

Sincerely,



Dale R. Bridgford, Supervisor
Technical Support Unit
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517- 582-3050

cc: Andrew Stuart, National Market Director, TRC
Kelly Cratsenburg, Project Manager, TRC
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Corrective Action File