



GRETCHEN WHITMER  
GOVERNOR

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



AARON B. KEATLEY  
ACTING DIRECTOR

June 23, 2023

VIA EMAIL

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

Dear Mouhamed Musheinessh:

SUBJECT: Conditional Approval; *Continued Eastern Boundary Investigation Report*;  
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 *Continued Eastern Boundary Investigation Report* (Report), dated April 3, 2023, 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 Report was reviewed for compliance with the approved Work Plan, and Part 111, Hazardous Waste Management, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended, and the administrative rules promulgated thereunder.

Based on our review the Report is approved, subject to the clarifications listed below.

1. **Section 1.0, Background:** The results of the additional investigation regarding the “lost” monitoring wells including: MW-122, MW-123, MW-124, MW-125, MW-126, MW-127, MW-130, MW-131, MW-132, and MW-133 in the Southern Area must be reported to EGLE as soon as they are available. EGLE places a priority on locating these wells as they represent a potential preferential pathway for surficial contamination to get to shallow groundwater if they are not located, repaired if possible, or abandoned. It is anticipated that if wells cannot be repaired, replacement wells may be necessary.
2. **Section 2.0, Investigation Activity Summary:** 40 CFR 264.91(c), which is adopted by R 299.9612(2) requires that “All monitoring wells must be cased in a manner that maintains the integrity of the monitoring-well borehole.” Monitoring well MW-121 must be replaced because tree roots are within the well, hindering the ability to collect static water elevation measurements and to collect a representative groundwater sample.

3. **Section 5.0, Proposed Future Activities:**

- a. Additional details regarding how the proposed utility investigation will be conducted must be provided to EGLE for review and approval. This can be implemented as a separate work plan and must be provided within 30 days of receipt of this letter.
- b. The proposed evaluation of public communication strategies must be conducted immediately so that it can be implemented as soon as practicable.
- c. The proposed Report to be provided following the next round of investigation must include, at a minimum, a narrative description of all work conducted and results, tabular summaries of new and existing data, figures showing the extent of contamination above applicable criteria for each effected pathway, copies of analytical data and all field forms, and recommended next steps.
- d. A tentative schedule for the proposed next steps in the investigation must be provided to EGLE for review.

4. **Table 4, Summary of Detected Per- and Polyfluoroalkyl Substances in**

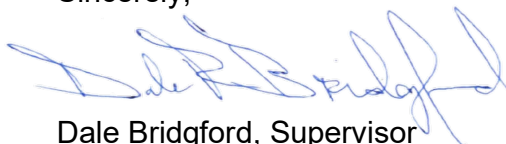
**Groundwater:** In future reports, applicable data summary and evaluation tables must be modified to correct the Generic GSI criterion for PFOA to a value of 170 ng/L. The generic GSI criterion for PFOA was updated July 27, 2022, to the new value. Based on EGLE review of the PFOA data collected and summarized in Table 4, it does not appear there were any exceedances of the generic GSI criteria for PFOA using 170 ng/L.

5. **Appendix A, Soil Boring Logs:** Future Soil Boring Logs must include Photoionization Detector (PID) readings recorded in the field.

6. **Appendix B, Field Notes:** Based on a review of the Water Sample Logs, it appears that in some monitoring wells a bladder pump was used for purging and a peristaltic pump was used at the time of sampling because water levels had fallen below the intake of the bladder pump. It is inappropriate to change methods of pumping during the purging and sampling process; therefore, EGLE recommends using a peristaltic pump for both purging and sampling activities.

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 Bridgford, Supervisor  
Technical Support Unit  
Hazardous Waste Section  
Materials Management Division  
517-582-3050

Mouhamad Musheinessh

Page 3

June 23, 2023

cc: Andrew Stuart, National Market Director, TRC  
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Corrective Action File