



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

July 9, 2019

Mr. Greg Fink, Director
EH&S Risk Management
Stericycle Environmental Solutions
18000 72nd Avenue South, Suite 217
Kent, Washington 98032

Dear Mr. Fink:

SUBJECT: Partial Approval as Interim Measures; *Revised Corrective Measures Implementation Work Plan*; Petro-Chem Processing Group of Nortru, LLC, Detroit, Michigan; MID 980 615 298; Waste Data System Number 399102

Effective April 22, 2019, the Michigan Department of Environmental Quality, Waste Management and Radiological protection Division, became the Michigan Department of Environment, Great Lakes, and Energy (EGLE), Materials Management Division (MMD).

EGLE, MMD, has reviewed the February 18, 2019, *Revised Corrective Measures Implementation Work Plan* (CMI Work Plan), for the Petro-Chem Processing Group of Nortru, LLC (PCPG) facility located at 421 Lycaste Street in Detroit, Michigan. The MMD reviewed the CMI Work Plan for compliance with the PCPG Hazardous Waste Management Facility Operating License, effective December 18, 2012 (License); and Part 111, Hazardous Waste Management, of the Michigan Natural Resources and Environmental Protection Act, 1994 PA 451, as amended.

Based on this review, the MMD determined that the CMI Work Plan cannot be approved at this time because PCPG needs to complete additional investigations for the vapor intrusion (VI) pathway, and the presence of perfluoroalkyl and polyfluoroalkyl substances (PFAS) constituents in groundwater. Typically, the CMI Work Plan specifies the methods for remediating contamination that has been completely delineated. With the outstanding investigation tasks, delineation is not complete. In an effort to continue progress at the facility, the MMD approves the following tasks as interim measures (IM) subject to the following modifications:

1. Utility lines along Lycaste Street should be investigated for potential groundwater and soil gas migration, given the 8 inch water line and sewer line that connect from on-site to off-site locations in the right-of-way at the northeast and southeast corners of the facility.
2. The proposals for Berm Removal and the pilot multi-phase extraction system are approved as interim measures as an initial phase of the CMI Work Plan, so that these interim remedies can proceed during this construction season while PFAS, VI, and utility corridor investigations are still ongoing or being planned. Once all investigations are complete, PCPG shall resubmit or amend the CMI Work Plan with the updated information for final approval, as a second phase.
3. The restrictive covenant language for Building 301 must be expanded to cover the paved areas to the west, in order to cover the soil sample 14s location.

4. The VI Work Plan, proposed in the CMI Work Plan, must be submitted within 30 days after the date of this letter. The VI Work Plan must also identify all potential off-site receptors needing building evaluations, and sub-slab soil gas and indoor air investigation sampling. Based on the May 10, 2019, meeting between EGLE, Remediation and Redevelopment Division; EGLE, MMD; and Bureau Veritas in the EGLE Warren District Office, the VI Work Plan should also include the following additional components, as a minimum:
 - a. Toluene as a sampling parameter, since it can cause health effects within 20 minutes of exposure.
 - b. If using existing or new groundwater monitoring wells, be sure to screen the well at the top of the water table.
 - c. Buildings within 100 feet off-site to the southwest may be impacted by the likely-commingled plume of contamination. The VI Work Plan should be updated to include taking a soil vapor sample within City of Detroit property, or right-of-way near St. Jean Street (one block southwest of Old St. Jean), to try to determine a boundary condition.
5. Additional public informational meetings are required in order to bring the community up to speed on cleanup actions, prior to a public notice and hearing on the final CMI Work Plan, and while IMs and investigations are being implemented.

Mr. Dan Dailey, Environmental Engineer Specialist, Permit and Corrective Action Unit, Hazardous Waste Section, MMD, will contact you in the near future to coordinate the first public informational meeting. In accordance with License Condition VI.E, the approved IMs are incorporated into, and an enforceable part of, the License. PCPG shall implement the approved IMs in accordance with the schedules contained therein. Pursuant to License Condition VI.K, PCPG shall submit IM progress reports within 90 days of initiation of the IM, and every 90 days thereafter, unless otherwise approved. The IM Final Report is due within 60 days of completion of the IMs.

Should you have any questions regarding this review, please contact Mr. Dan Dailey, at 517-242-7261; DaileyD@Michigan.gov; or EGLE, MMD, P.O. Box 30241, Lansing, Michigan 48909-7741.

Sincerely,



Kimberly M. Tyson, P.E., Supervisor
Permit and Corrective Action Unit
Hazardous Waste Section
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cc: Mr. Ed Burk, Stericycle
Ms. Kellie Wing, Bureau Veritas North America, Inc.
Ms. Tracy Kecskemeti, EGLE
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Corrective Action File