## Great Lakes Environmental Remediation & Redevelopment Conference

**Revitalizing** a Contaminated Former Production Facility in a Rust Belt City

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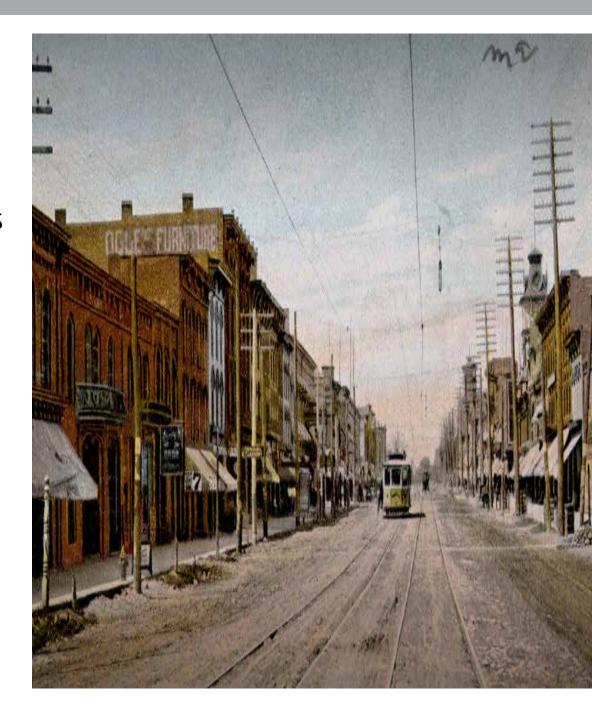






## Regional Overview Demographics

- Settled in 1818
- Maximum Population was in 1970 – 85,000
- In 2010 population had dropped to 60,000
- Automotive Industry was key to growth & to rapid loss in population





## **Site History**

- GMC acquired Site in 1906 from Rapid Motor Vehicle Company
- Historical operations included:
  - Metal Finishing
  - Stamping
  - Machining
  - Grinding
  - Polishing
  - Solvent & Oil Storage





## **Site History**

- GMC acquired Plants 3, 4
   & 5 between 1937 & 1963
- Plants ran prototypes for utility vehicle assembly line and painting process, R&D and engineering
- GMC ceased operations & demolished all Plants by 2006
- RACER Trust took over Site in 2011





## Revitalize Auto Communities Environmental Response (RACER)

- Keynote Speaker this morning Grant Trigger of RACER Trust Michigan Cleanup Manager
- Legacy GM Manufacturing Sites part of US Bankruptcy Court agreements
- Cleanups approved by state and/or federal regulatory agencies





### **RACER**

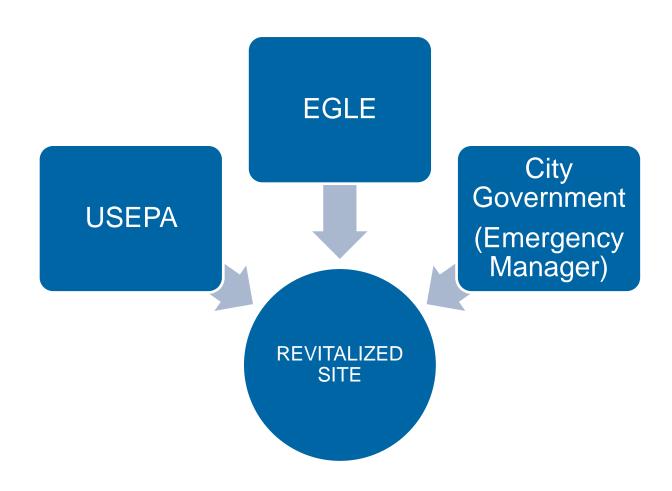
- RACER can sell or lease properties even before cleanups begin or are completed, as long as RACER access is guaranteed
- RACER's remediation goal is to obtain "No Further Action" letters from environmental regulators for all locations where cleanups are required
- Revitalize communities in an environmentally responsible way





### Site Sale

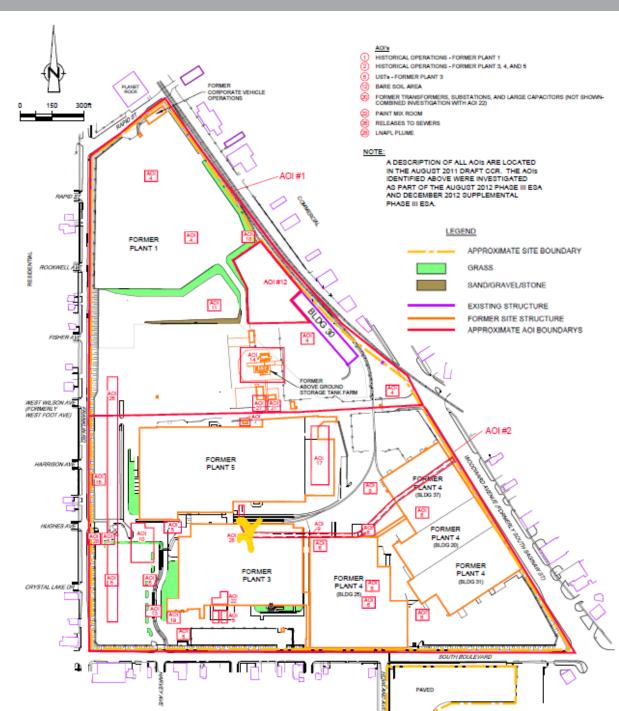
Sale began in 2012 while under USEPA RCRA closure obligations





## Facility Investigations

- Phase I ESAs
- Soil Borings
- Monitoring Wells (on & off-site)
- LIF Borings
- Fingerprint Analysis & T-testing
- Sewer Investigations

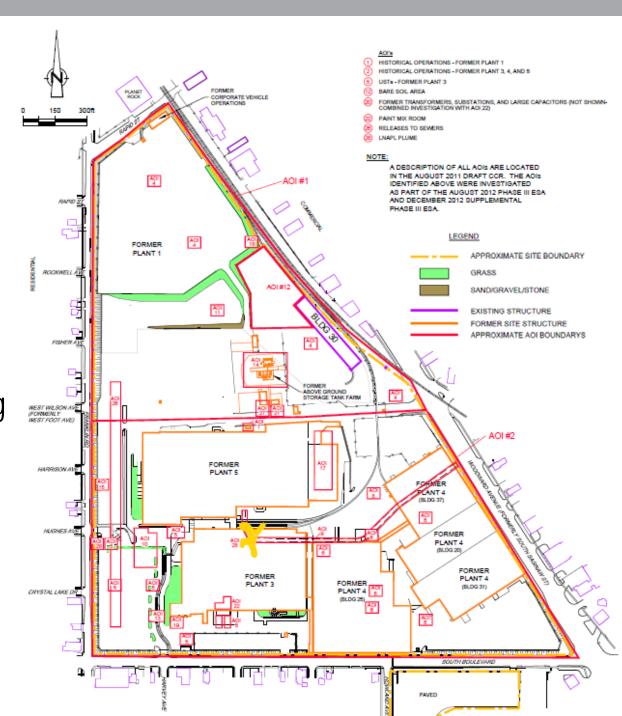




# Facility Investigations Lessons Learned

- Obtain utility maps
- Use an experienced private utility locating operator
- Have same geologist oversee utility locating that oversee's drilling
- Communicate
- Have site contact approve all staked locations





## **Findings**

Primary Environmental Concerns:

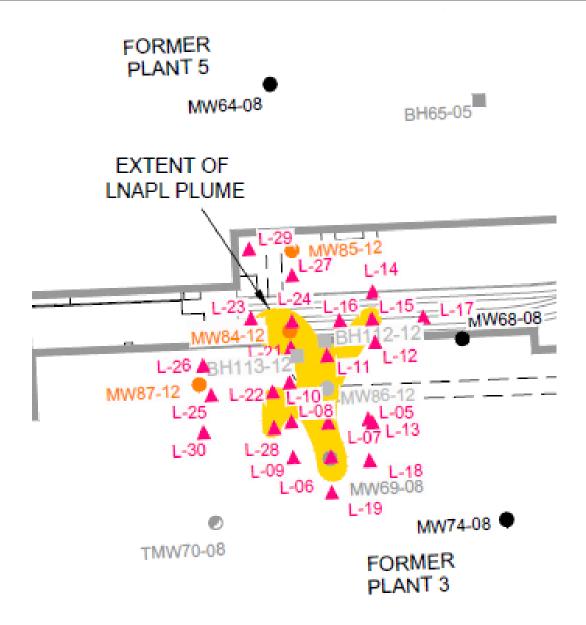
- VOCs, PNAs & PCBs in soil
- Dissolved VOCs & PNAs in groundwater
- Off-Site migration of dissolved VOCs
- GW Flow Generally to the NW
- LNAPL





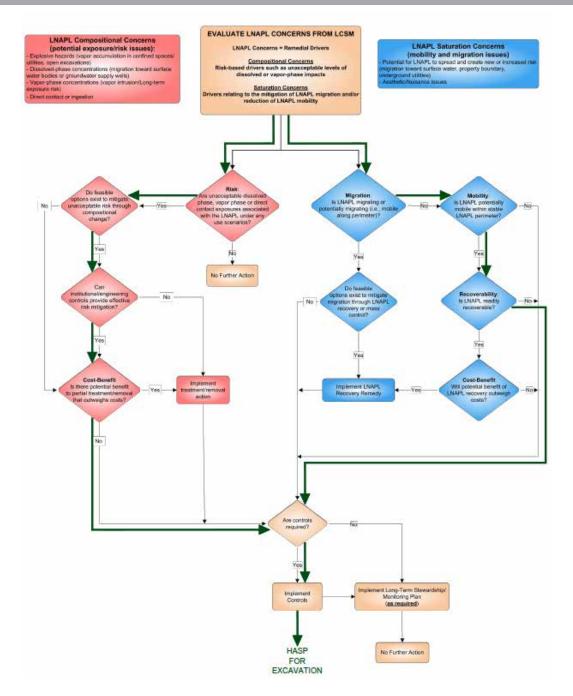
## **LNAPL** Conceptual **Site Model** (LCSM)

- LNAPL is degraded non-volatile middle distillate fuel type
- LNAPL body is stable & non-migrating
- Fraction of LNAPL that may be mobile or migrating is very low





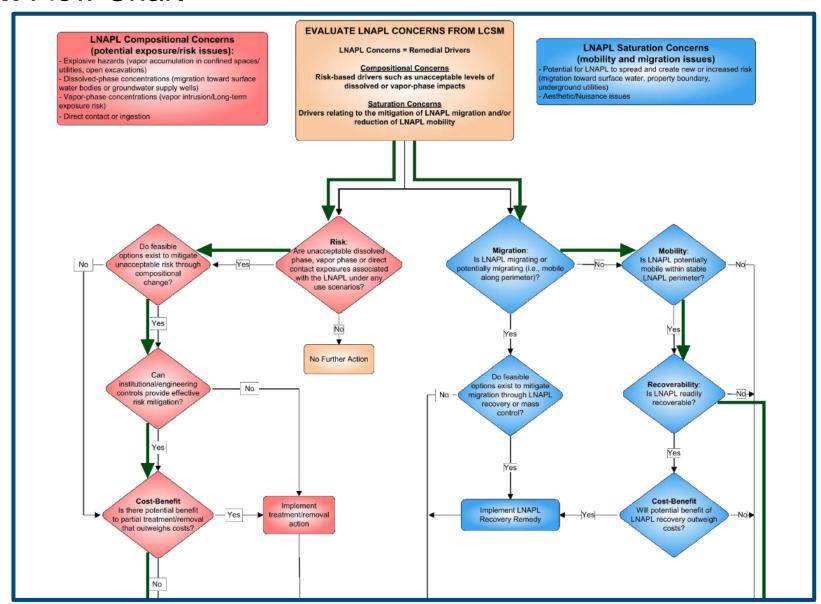
### **LCSM** Flow Chart





#### **EVALUATE LNAPL CONCERNS FROM LCSM LNAPL** Compositional Concerns **LNAPL Saturation Concerns LCSM** Flow Chart (potential exposure/risk issues): LNAPL Concerns = Remedial Drivers (mobility and migration issues) Explosive hozards (vapor accumulation in confined spaces Compositional Concerns Potential for LNAPL to spread and greate new or increased risk utilities, open excavations) - Dissolved-phase concentrations (migration toward surface) Risk-based drivers such as unacceptable levels of rigitation toward surface water, properly boundary, interpround utilities) Assithetic/Numanoo issues water bodies or groundwater supply wells) dissolved or vapor-phase impacts Vapor-phase concentrations (vapor intrusion/Long-term Saturation Concerns Drivers relating to the mitigation of LNAPL migration and/or reduction of LNAPL mobility Direct contact or ingresion Do feasible Migration: Is LNAPL migrating or Are unacceptable dissolve Mobility: options exist to misgate phase, vapor phase or direct is LNAPL potentially mobile within stable unacceptable risk through with the LNAPL under any potentially migrating (i.e., mobile along perimeter)? compositional LNAPL penmeter change? use scenarios? No Further Action Do fessible Recoverability: options exist to mitigal No No. ontrois provide effective migration through LNAPL is LNAPL readily risk mitigation? recovery or mass Cost-Benefit Cost-Benefit Implement Will potential benefit of NAPL recovery nutweigh costs? Implement LNAPL is there potential benefit. to partial treatment/removal Recovery Remedy action that outweight costs? Are controls required? Implement Long-Term Stewardship/ Monitoring Plan Controls (as required) HASP No Further Action FOR EXCAVATION

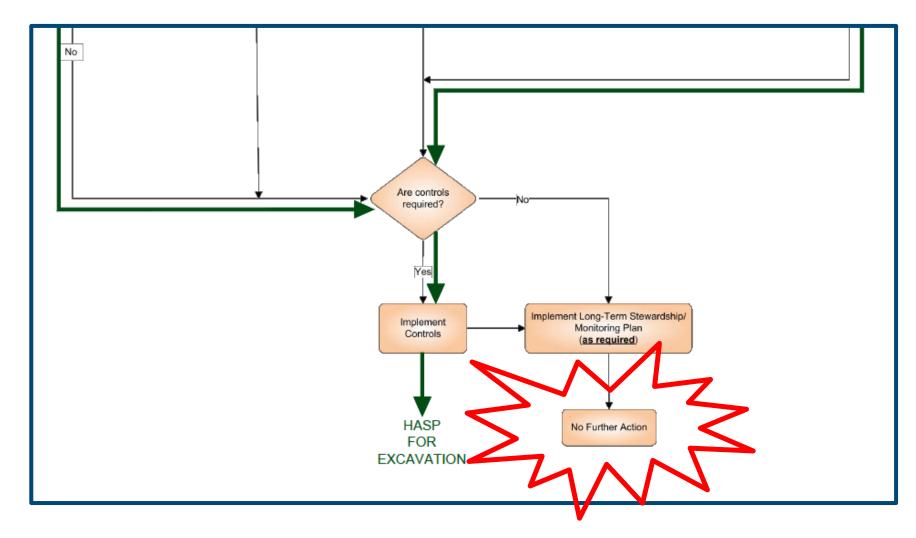
### **LCSM** Flow Chart





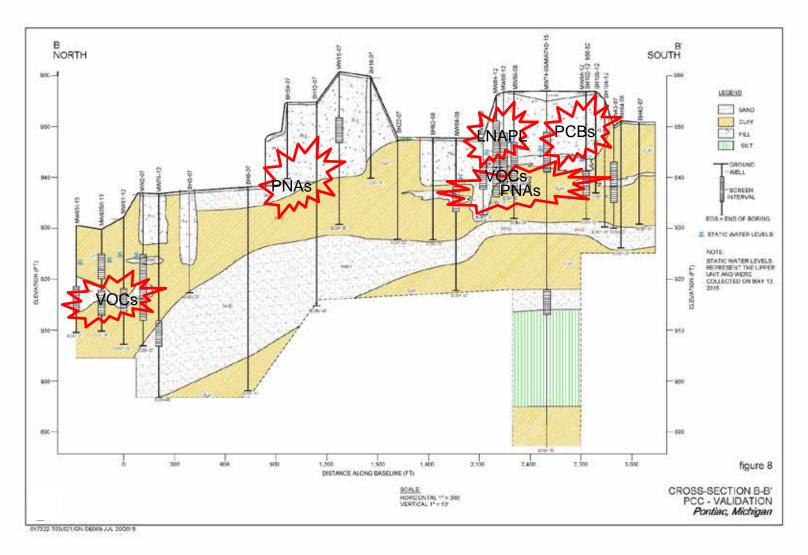
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## **LCSM** Flow Chart





## Conceptual Site Model





## **CSM** - Surrounding Area





## Fast Track RCRA Reporting: 6 Month Timeline

Administrative Order on Consent (AOC) with USEPA included goals for completing:

Migration of Contaminated Groundwater

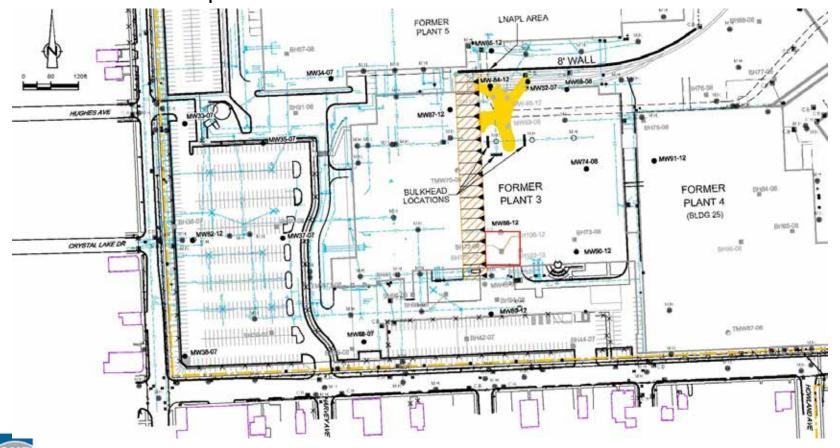
AOC EI CA725 EI CA750 CMP

Environmental Indicator Report -Determination for Current Human Exposures Corrective Measures Proposal



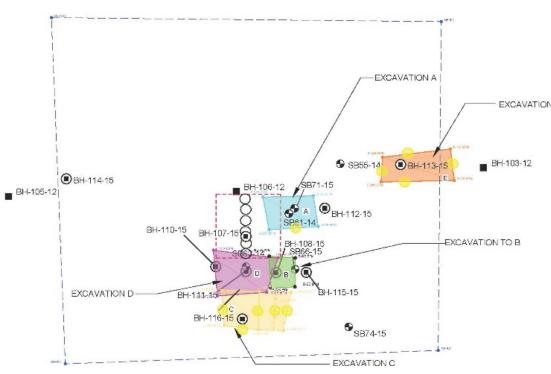
## Interim Measures implemented with EPA's approval

 Elimination of potential pathways for off-site migration of LNAPL and dissolved phase VOC plumes by bulk heading storm sewers within the areas of impact



## Interim Measures implemented with EPA's approval

- Removed PCBs in site soils (greater than 100 ppm)
- Utilized PCB field test kits to improve the project timeline & reduce the number laboratory samples









## Corrective Measures Completed/Ongoing



- Groundwater Use Restriction Institutional Controls – on & off-site (Obtained via Emergency Manager in 1 week)
- LNAPL deemed de-minimus

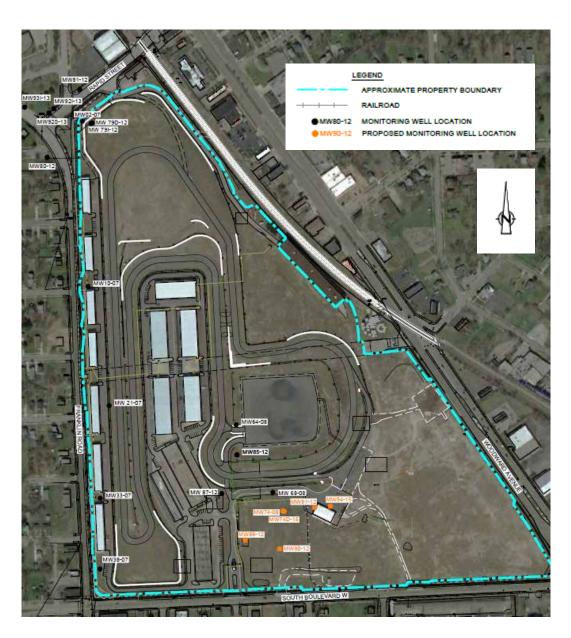
 On-site deed restriction – NR, groundwater use, VI



**Corrective Measures** 

Completed/Ongoing

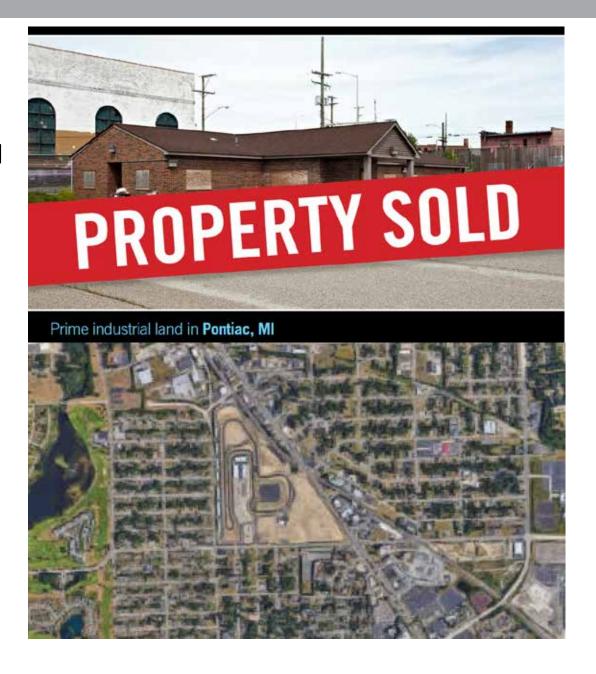
- Wells abandoned for redevelopment & reinstalled in 2018/2019 (ongoing)
- Ongoing groundwater monitoring





## **Brownfield Conditions**

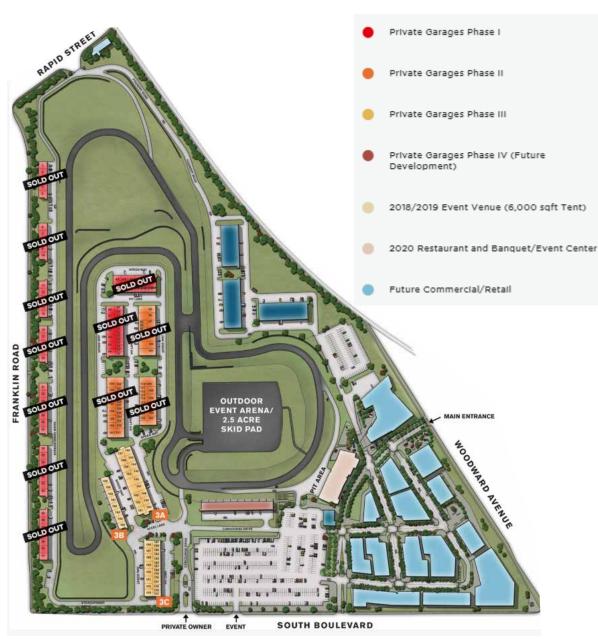
- City of Pontiac is qualified local government unit
- Presence of contaminants
   generic residential
   criteria
- 30,000 SF area of LNAPL
- TCE in groundwater
- Multiple VOCs & metals in soils & groundwater
- Eligible for \$14.7 MM TIF





### Redevelopment

- Car Condominiums
- Year-round auto-themed destination for auto collectors & enthusiasts
- Located along
   Woodward Avenue
   where the world's
   largest auto event takes
   place (DREAM CRUISE)





## Redevelopment

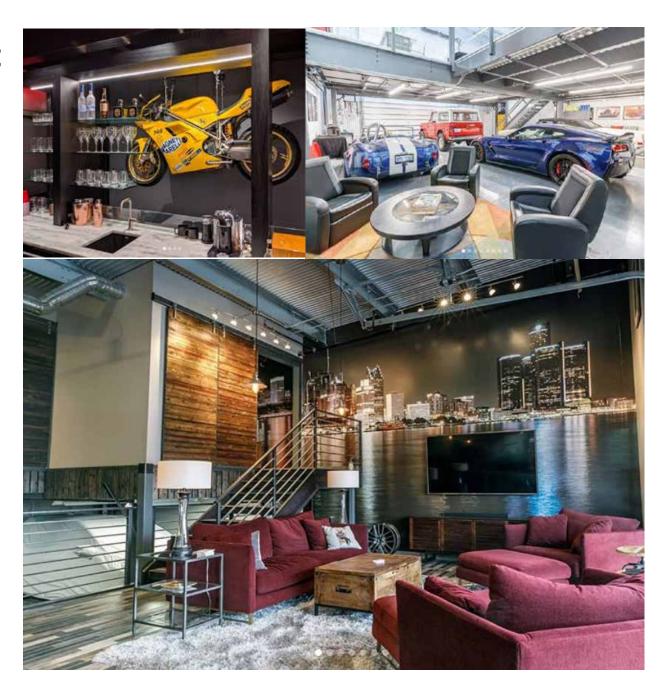
- State-of-the-art 1.5 mile performance track
- Auto-themed retail buildings
- Restaurant
- Office building
- Outdoor stage & exhibition area
- Accommodations for over 1,000 classic cars







## Redevelopment







**Questions?** 

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