



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
WARREN DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

March 18, 2021

Ms. Christina Pearse
Sauk Trail Hills Landfill
5011 South Lilley Road
Canton, Michigan 48188

Dear Ms. Pearse:

SUBJECT: Perfluoroalkyl/Polyfluoroalkyl Substances and 1,4-Dioxane Sampling
Sauk Trail Hills Landfill, Wayne County
Waste Data System Number: 410118

Perfluoroalkyl and Polyfluoroalkyl Substances (PFAS) and 1,4-dioxane are a growing environmental concern in the State of Michigan. PFAS are man-made chemicals that have been widely used in industry and consumer products since the 1950s, and are most commonly associated with food packaging, non-stick coatings, plating operations, firefighting foams, and stain- and water-resistant treatments for clothing, furniture, and carpet. The chemical 1,4-dioxane was widely used as a stabilizer for chlorinated solvents and as a laboratory reagent. It is also produced as by-product in the manufacture of some cosmetics and household products that create suds, like shampoo, liquid soap, and detergent.

Due to their unique chemical properties, PFAS and 1,4-dioxane are very mobile in groundwater and do not readily break down. Based on the potential for PFAS and 1,4-dioxane-containing materials to have been disposed of at the Sauk Trail Hills Landfill (Facility), located at 5011 S. Lilley Road, Canton, Wayne County, and combined with the fact that there are potential downgradient drinking water and/or surface water receptors, the Department of Environment, Great Lakes, and Energy (EGLE) has determined that it is necessary to determine if PFAS or 1,4-dioxane contamination is present at the Facility at levels that require further action.

To determine whether PFAS and 1,4-dioxane are present in concentrations of concern, EGLE is requesting that both leachate and select groundwater monitoring wells, determined by the Facility, and approved by EGLE, be sampled, and analyzed for PFAS constituents and 1,4-dioxane. The samples should be analyzed for the PFAS constituents listed in the enclosed EGLE PFAS Minimum Laboratory Analyte List. A list of accredited laboratories capable of analyzing for this list can be found on the last page of that document. If PFAS or 1,4-dioxane is detected in the monitoring wells, it is likely that additional sampling would be required. EGLE has established cleanup criteria for PFAS and 1,4-dioxane under Part 201, Environmental Remediation, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended.

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Due to extremely low laboratory method detection limits required by the Part 201 PFAS cleanup criteria, a special protocol needs to be followed when sampling for PFAS. Sampling guidance can be found at www.michigan.gov/pfasresponse, and then by clicking "Testing," followed by "PFAS Sampling Guidance." A list of accredited laboratories capable of analyzing for the EGLE PFAS Minimum Laboratory Analyte List can also be found at this website. It is recommended that USEPA Modified SW-846 Method 8260 SIM, with heated purge and trap, be used for 1,4-dioxane analysis to meet EGLE's required minimum detection limits.

Please contact me regarding this sampling, no later than **April 19, 2021**. At that time, we can discuss the need for a work plan and summary report associated with this sampling event.

Should you require further information regarding the matters discussed in this letter, please contact me by telephone at 586-604-4531 or by e-mail at BakunJ@Michigan.gov.

Sincerely,



James E. Bakun, Geologist
Materials Management Division
Warren District Office
586-604-4531

Enclosure

cc: Mr. Anthony Matlock, Wayne County Department of Health
Mr. Jim Arduin, EGLE
Mr. Greg Morrow, EGLE
Ms. Carolyn Parker, EGLE