December 2, 2020

City of Detroit Department of Public Works Coleman A. Young Municipal Center 2 Woodward Avenue – Suite 611 Detroit, MI 48226

**RE:** Public Highway Institutional Controls

Knight #311

11694 Greenfield Road, City of Detroit, MI

Facility ID No: 00012305

EGLE Reference Number: PHIC-RRD-213-19-009

#### To Whom it May Concern:

An application for utilizing institutional controls for soil corrective action is being submitted for the Knight Enterprises, Inc. Site K-311, located at 11694 Greenfield Road, City of Detroit, Wayne County, Michigan (Site). The Site is utilized as a gasoline station with a convenience store. BLDI, Inc. is currently retained as the environmental consultant for the Site.

The soil contamination remaining at this Site exists at concentrations that exceeds the applicable Part 213 Risk-Based Screening Levels (RBSLs) and/or Site-Specific Target Levels (SSTLs) in locations beyond the Site property boundary along and beneath the eastern adjacent alleyway owned by the City of Detroit.

The application for institutional control includes the completed Public Highway Institutional Control form. Upon your review, you will note that the Site conditions may present an exposure risk to employees or subcontractors working within the eastern adjacent alleyway. If potential construction activities would require removal of contaminated soil, the contaminated media will need to be characterized and disposed of properly, and additional precautions should be taken to prevent workers from the exposure to contaminated soil. Funding for disposal of contaminated media associated with a refined petroleum underground storage tank release and located within a public right of way is available from the State of Michigan through the Michigan Underground Storage Tank Authority (MUSTA), public highway cleanup fund if this form is properly signed and submitted.

Regards,

Renée L. Pewitt, EP Project Manager

Attachment

cc: Mr. John Denton 

Knight Enterprises, Inc. (via email)

 ${\tt MICHIGAN\ DEPARTMENT\ OF\ ENVIRONMENT,\ GREAT\ LAKES,\ AND\ ENERGY-REMEDIATION\ AND\ REDEVELOPMENT\ DIVISION}$ 

PO BOX 30426, LANSING, MI 48909-7926, Phone 517-284-5087, Fax 517-241-9581

#### PUBLIC HIGHWAY INSTITUTIONAL CONTROL

When environmental contamination is proposed to remain in place within a public highway owned or controlled by a county road commission or local unit of government, the "Public Highway Institutional Control" may be used to satisfy all of the requirements under Section 21310a(3)(c) of Part 213, Leaking Underground Storage Tanks, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (NREPA). In addition, the "Public Highway Institutional Control" may serve as an alternative instrument, with department approval, pursuant to Section 20121(9) of Part 201, Environmental Remediation, of the NREPA. The party proposing this Institutional Control (IC) shall submit the completed form and all attachments with a Closure Report pursuant to Part 213 or a No Further Action Report pursuant to Part 201 to the appropriate District Office. Multiple signature pages may be necessary if there is more than one authority that owns or controls the public highway. The EGLE Reference Number can be obtained by contacting the Remediation and Redevelopment Division at deg-rrd@michigan.gov, or by calling 517-284-5153.

SECTION 1. FACILITY INFORMATION:	EGLE REF. NUMBER.: PHIC-RRD-213-19-009						
SITE OR FACILITY NAME: K-311	FACILITY NAME: K-311		SITE OR FACILITY ID NUMBER: 00012305				
STREET ADDRESS: 11694 Greenfield Road							
CITY: Detroit	ZIP: 4822	ZIP: 48227 COUNTY: Wayne					
NAME OF PARTY PROPOSING PUBLIC HIGHWAY IC: Knight Enterprises, Inc.	EMAIL ADDRESS: jdenton@knightenterprisesinc.com						
STREET ADDRESS: 47705 West Road, Suite B-102	CITY: Wix	m STATE: MI		ZIP: 48393			
CONTACT PERSON: John Denton	PHONE: 2	E: 248-478-3651		FAX:			
EGLE District Office: □Cadillac □Gaylord □Grand Rapids □Jackson □Kalamazoo □Lansing □Saginaw Bay ☑SE Michigan □Upper Peninsula							
SECTION 2. AFFECTED PUBLIC HIGHWAY INFORMATION	l:						
1. Name of affected public highway(s) and nearest intersection: Alley located along the eastern boundary of 11694 Greenfield Road, south of Wadsworth Avenue intersection							
2. Known or suspected contaminant(s) type (Check all that apply):							
	□Metal	S	Other				
3. Is residual/mobile nonaqueous-phase liquid present in the affected public highway: ⊠YES □NO							
4. Media contaminated:							
a. ⊠Soil Depth to contaminated soil: ~1.5 to 27.5 feet below ground surface (bgs); depth of contaminated soil							
depends on the location within the alleyway							
b. ☐Groundwater Depth to contaminated groundwater: Groundwater not encountered at the site to a depth of 28 feet bgs							
5. Provide a scaled drawing of the portion of the public highway subject to the institutional control that denicts the area							

- 5. Provide a scaled drawing of the portion of the public highway subject to the institutional control that depicts the area impacted by regulated substances and the location of utilities in the impacted area, including storm water systems and municipal separate storm water systems. At a minimum, the scaled drawing should include:
  - a. A north arrow.
  - b. A graphical scale bar and scale statement (e.g. 1"=50').
  - c. The limits of the source property plotted, to scale, showing the relationship to the county road commission or local unit of government and other affected parcels.
  - d. The public highway(s) name identified.
  - e. A statement identifying the Township, Range, Section, and Quarter Section where the parcel is located.
  - f. The limits of the affected public highway plotted to scale. This area should be hatched and labeled appropriately.
  - g. The location of significant site features such as buildings, drives, parking lots, and road surface.
  - h. Cross section illustrating affected public highway, media, utilities, and location and depth of contaminated media.
  - Most recent analytical data illustrating contaminant compounds and concentrations within the contaminated media.

Phone Number 616-459-3737	Fax Number 616-459-5357	Email Address reneep@bldi.com		
BLDI, Inc.	130 Fountain St NE, Grand Rapids, IVII	49503		
	150 Fountain St NE, Grand Rapids, MI 49503			
Name of Company (if applicable)	Address, City, State, Zip			
	Renée L. Pewitt, EP	12/2/2020		
Signature	Print	Date		
I, as the submitter identified in Section 1, or the qualified consultant authorized to complete this document on the submitter's behalf, hereby attest to the accuracy of the statements in this document and all attachments and have provided this document to the county road commission or local unit of government.				
SECTION 4. SUBMITTER INFORMATION:				
MYES □NO  If yes, please provide information below and attach any the contamination that enters or has the potential to enter the contamination that enters or has the potential to enter the contamination that enters or has the potential to enter the contamination of the City of Detroit, the systems. A sanitary sewer utility is present within the C stormwater catchments drains are present on the centre no connection to the combined sewer system, and act a Based on information provided by the City of Detroit, the bgs within the alleyway and is approximately 18 inches observed within OW-1; however, vertical contamination and adjacent to the alleyway itself. Therefore, it is possiproximity to the sanitary sewer.	ter the storm sewer system.  municipal sanitary sewer and storm sew ity of Detroit alleyway, adjoining east of al portion of the station property. These as a water catchment for the runoff colle e sanitary sewer is located at a depth of in diameter. No groundwater is present is anticipated to range from approximate	ver are combined sewer the Site property. Two two drains appear to have cted on the station canopy. approximately 10-15 feet at this Site other than that tely 1.5 to 27.5 feet bgs in		
SECTION 3. STORM SEWER SYSTEM CERTIFICATION Is contamination present in or does the contamination because storm sewer systems and combined sewers)	nave the potential to enter the storm sew			
disposed of property. Workers should be notified about the company of the company		nated soils.		
Soil contamination was documented to be present in from a confirmed release of gasoline from the under (C-0249-17). Groundwater was not encountered dur contamination include direct contact and soil excava to contain concentrations of residual non-aqueous p in soil samples collected from locations adjacent to tadjacent to the alleyway, the direct contact exposure below ground surface may encounter contaminated	n the eastern adjoining alleyway at 1169- ground storage tank (UST) system, that ing the on-site or alleyway investigations ition/relocation. The soil in the eastern a hase liquid (NAPL) based on detections the alleyway. In addition, based on the c e pathway is relevant. Any soil excavations soils. Any contaminated soil encountere	occurred in October 2017 s. Risks due to the soil djoining alleyway is assumed of gasoline range organics oncentration of GRO on deeper than 1.5 feet d should be handled and		
7. Exposure risks:  a. Due to groundwater contamination (Check all that □Drinking water □Indoor air inhalation □Surface b. Due to soil contamination (Check all that apply): □Direct contact □Ambient air Inhalation □Indoo □Direct transport to surface water ☑Soil excavat	e water or air inhalation □Leaching from soil to g	groundwater		
a. Are any of the parties listed above affected by the b. Have all of the parties above affected by the contactorrective action plan or pursuant to the due care re-	amination received notification of the exi	sting conditions as part of a		
Consumers Energy, DTE Energy, City of Detroit, De 11670 Greenfield Road, Detroit, MI)	troit Petroleum Properties III, LLC (1167	6 Greenfield Road and		
<ol><li>Provide a complete list that identifies all parties with public highway (including owners of real property, ea public utilities):</li></ol>				

Remediation and Redevelopment Division Phone: 517-284-5087

www.michigan.gov/deq

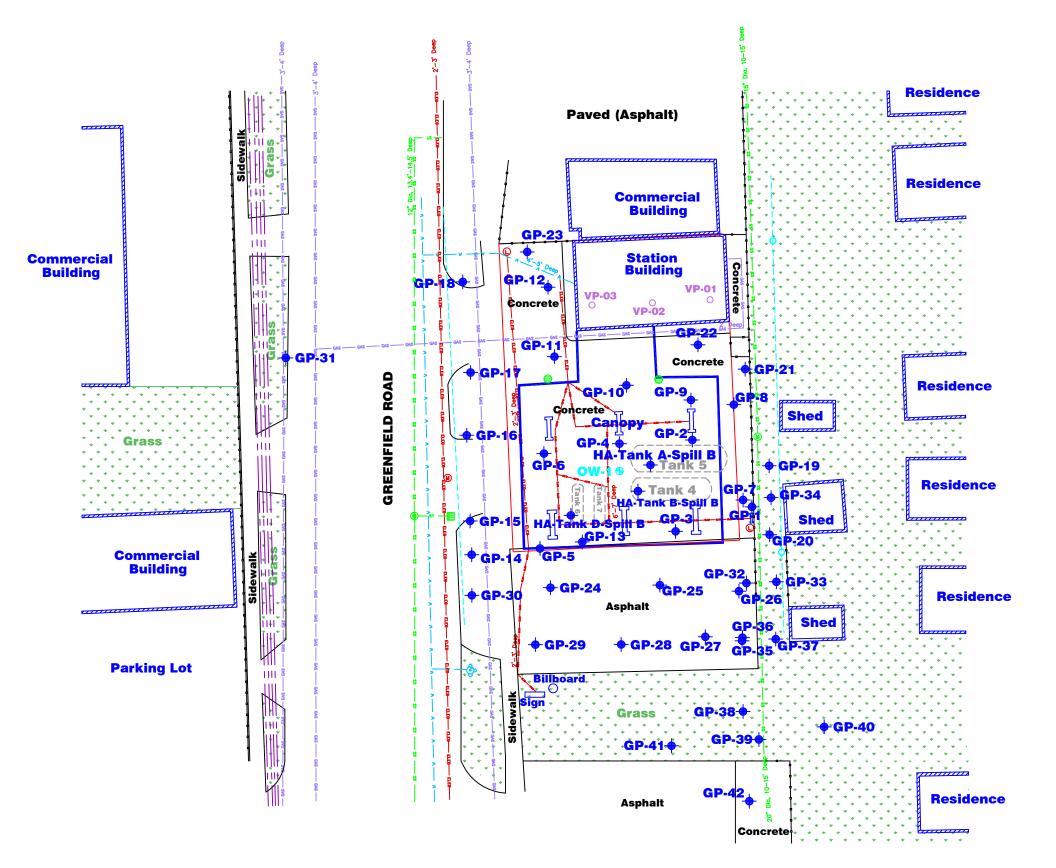
Name of county road commission or local unit of government: City of Detroit Department of Public Works						
The aforementioned <b>City of Detroit Department of Public Works</b> hereby confirms that there are no current plans to relocate, vacate, or abandon the public highway. With my signature below, I certify that I am legally authorized to sign on behalf of the <b>City of Detroit Department of Public Works</b> .						
Signature of Authorized Official	Print Authorized Official					
Title of Authorized Official	Date					
Name of county road commission or local unit of government	Address, City, State, Zip					
Phone Number	Fax Number	Email Address				

Remediation and Redevelopment Division Phone: 517-284-5087

### **FIGURES**







- MONITORING WELL LOCATION
- OPERATING WELL LOCATION
- SOIL BORING LOCATION
- SOIL GAS VAPOR PIN
- CATCH BASIN
- UTILITY MANHOLE
- UTILITY POLE
- LIGHT POLE

#### \_\_\_\_ DISPENSER ISLAND

FENCE

COMBINED UNDERGROUND STORM

& SANITARY SEWER LINE

UNDERGROUND WATER LINE

UNDERGROUND GAS LINE

OVERHEAD UTILITIES UNDERGROUND ELECTRIC

UNDERGROUND FIBEROPTIC

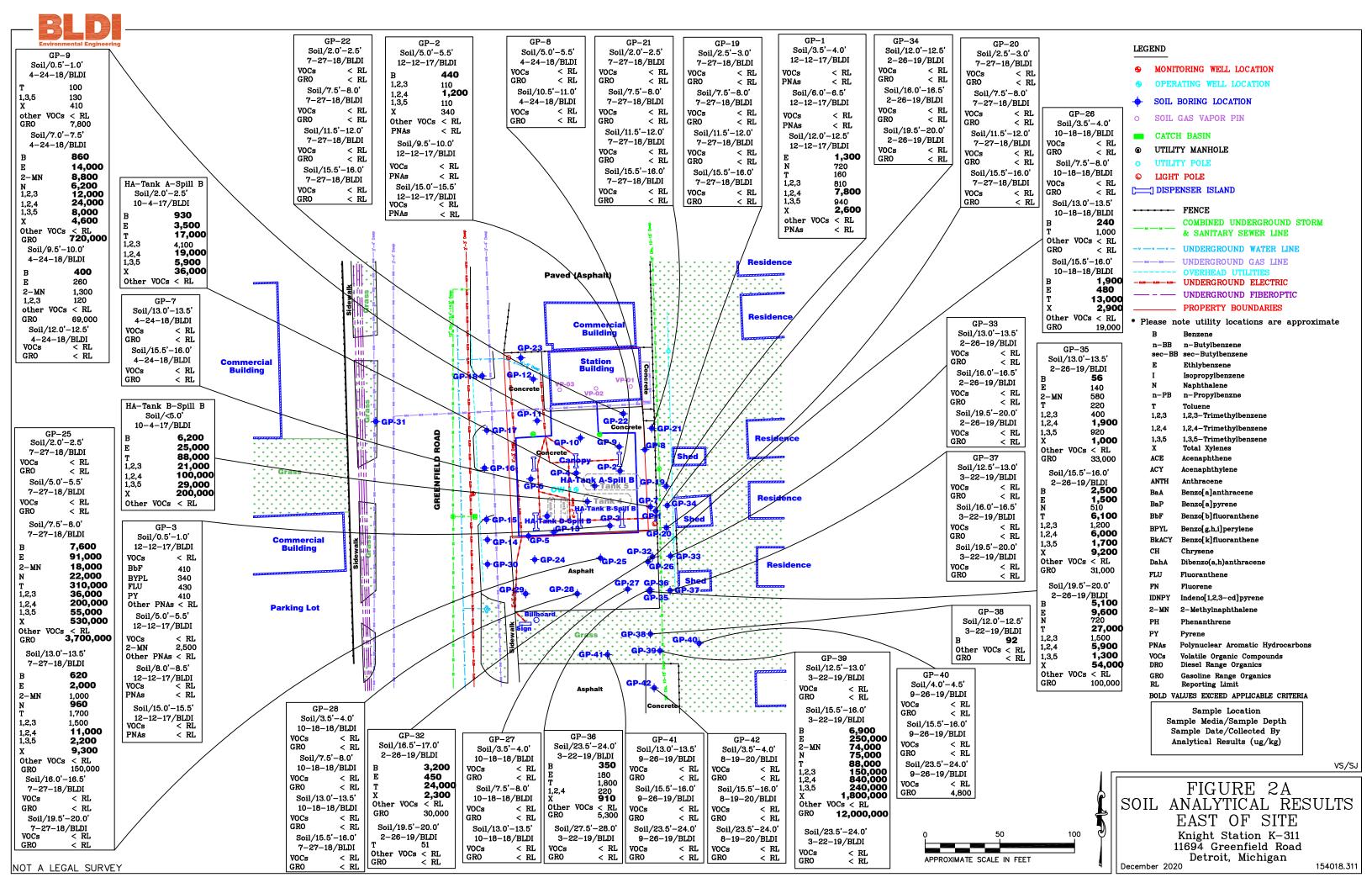
PROPERTY BOUNDARIES

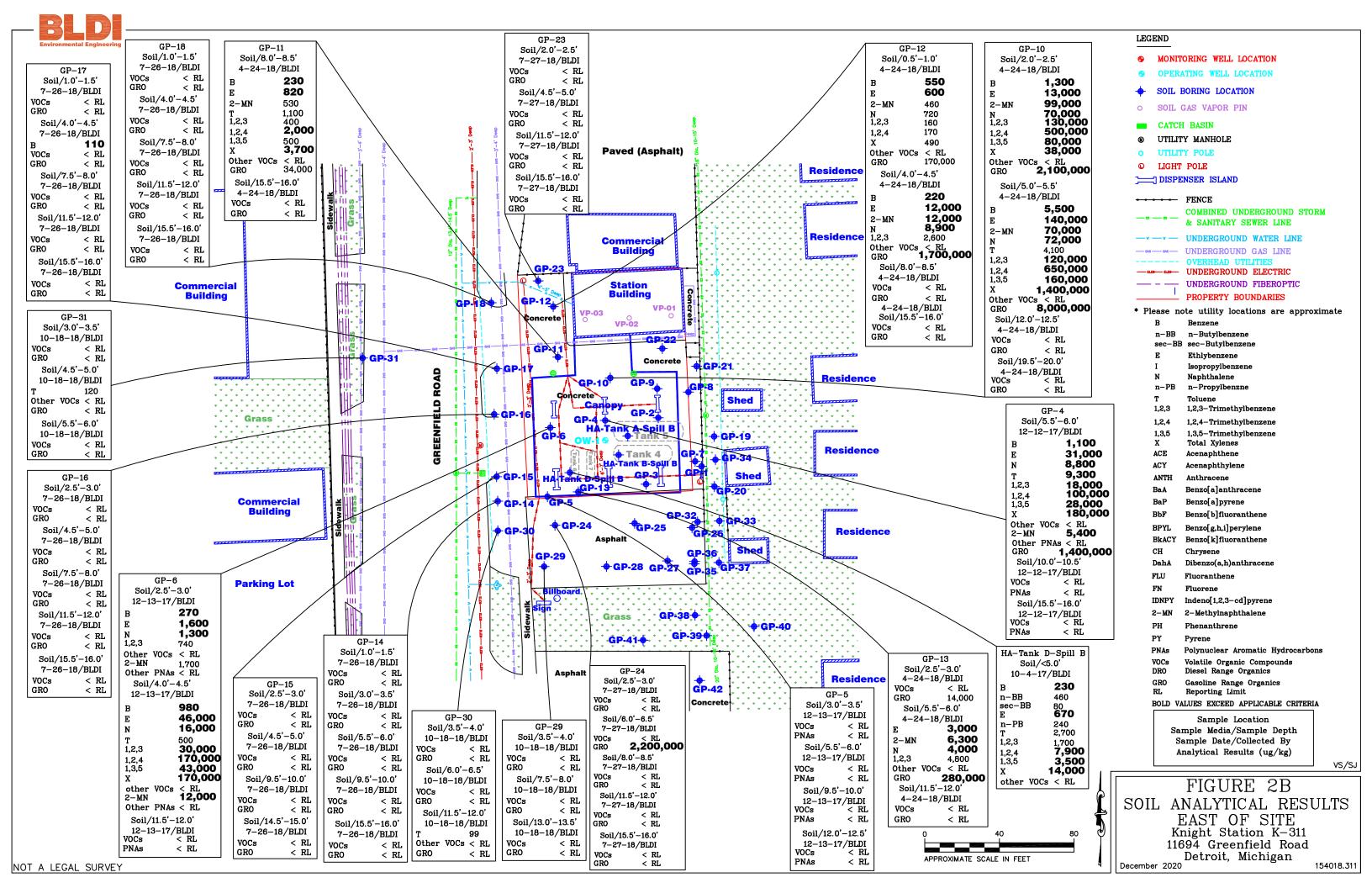
\* Please note utility locations are approximate

FIGURE 1

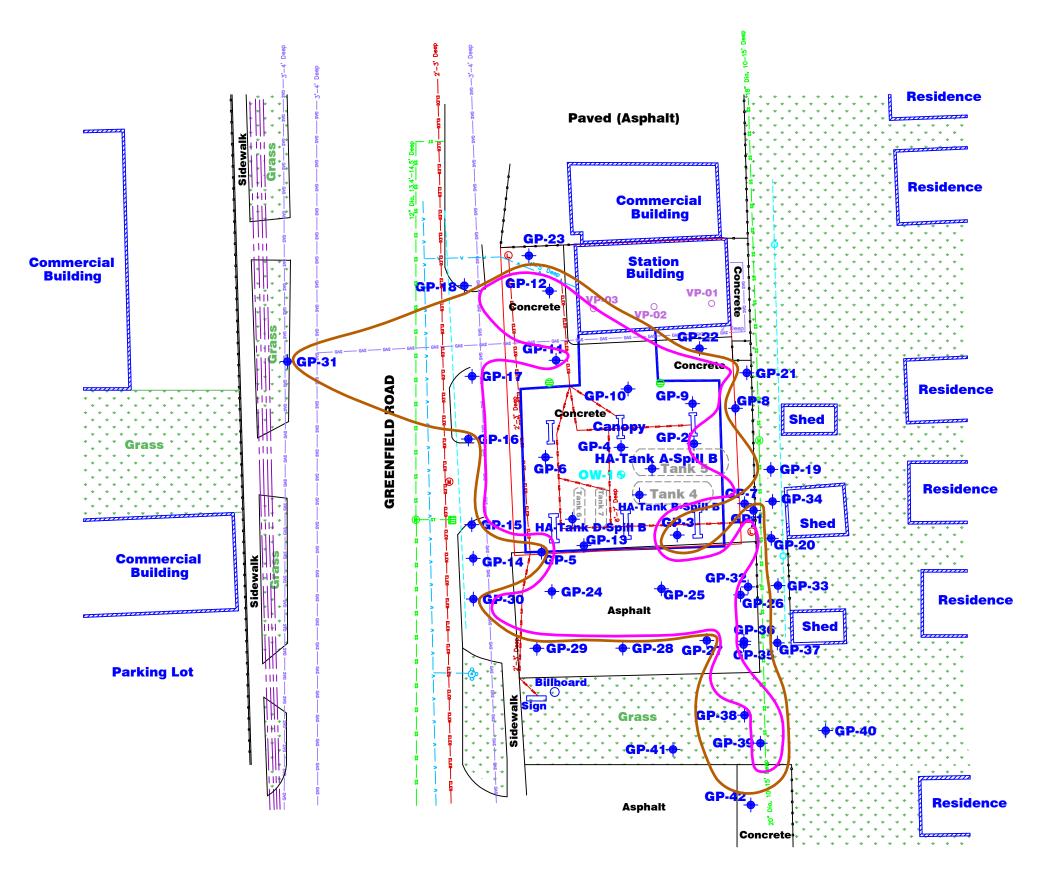
APPROXIMATE SCALE IN FEET

VS/SJ









- MONITORING WELL LOCATION
- OPERATING WELL LOCATION
- SOIL BORING LOCATION
- SOIL GAS VAPOR PIN
- CATCH BASIN
- UTILITY MANHOLE
- UTILITY POLE
- LIGHT POLE

DISPENSER ISLAND

FENCE

COMBINED UNDERGROUND STORM

& SANITARY SEWER LINE

UNDERGROUND WATER LINE

UNDERGROUND GAS LINE

OVERHEAD UTILITIES

UNDERGROUND ELECTRIC

UNDERGROUND FIBEROPTIC

PROPERTY BOUNDARIES

\* Please note utility locations are approximate

LATERAL EXTENT OF SOIL

CONTAMINATION

LATERAL EXTENT OF RESIDUAL

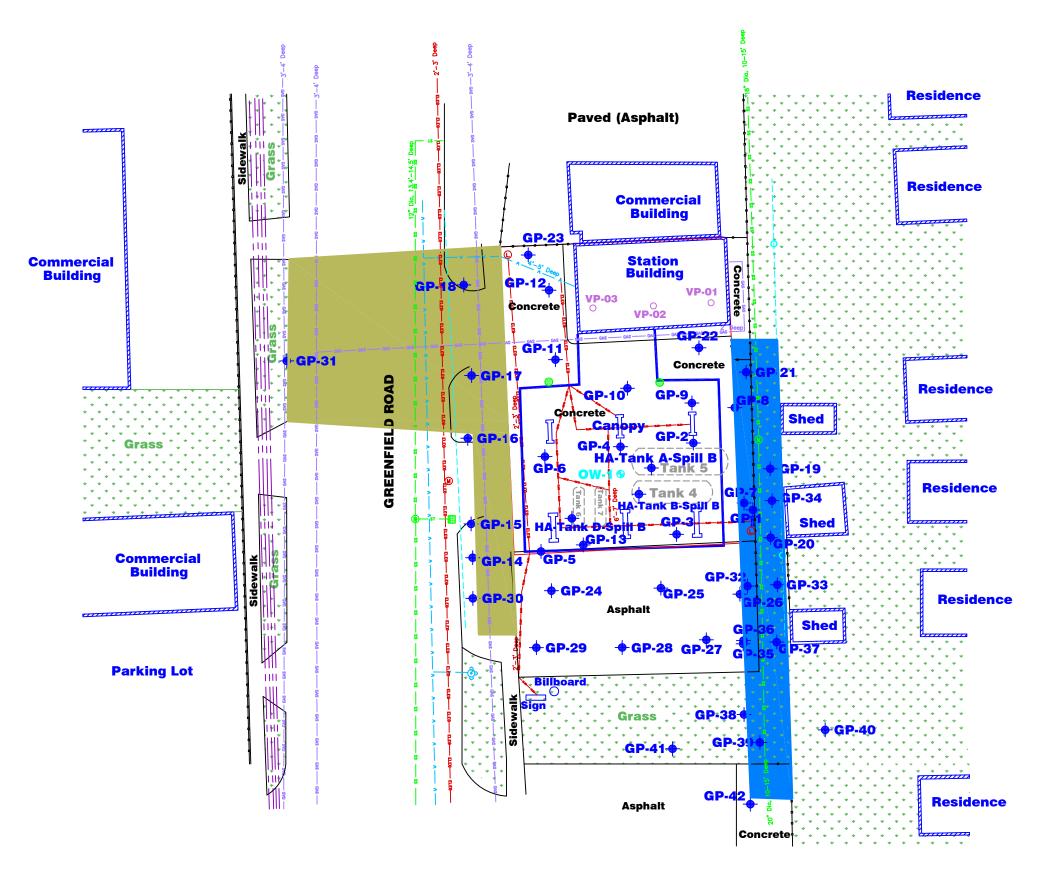
LNAPL

APPROXIMATE SCALE IN FEET

FIGURE 2C ESTIMATED LATERAL EXTENT OF SOIL CONTAMINATION

VS/SJ





- MONITORING WELL LOCATION
- OPERATING WELL LOCATION
- → SOIL BORING LOCATION
- O SOIL GAS VAPOR PIN
- CATCH BASIN
- W UTILITY MANHOLE
- o UTILITY POLE
- © LIGHT POLE

[ DISPENSER ISLAND

FENCE

COMBINED UNDERGROUND STORM

& SANITARY SEWER LINE

--- UNDERGROUND WATER LINE

MS — GAS — UNDERGROUND GAS LINE

-- OVERHEAD UTILITIES

UNDERGROUND ELECTRIC

UNDERGROUND FIBEROPTIC

PROPERTY BOUNDARIES

\* Please note utility locations are approximate

AREA SUBJECT TO PUBLIC HIGHWAY INSTITUTIONAL CONTROL FOR WAYNE COUNTY GREENFIELD ROAD

AREA SUBJECT TO PUBLIC HIGHWAY INSTITUTIONAL CONTROL FOR CITY OF DETROIT ALLEY

VS/SJ



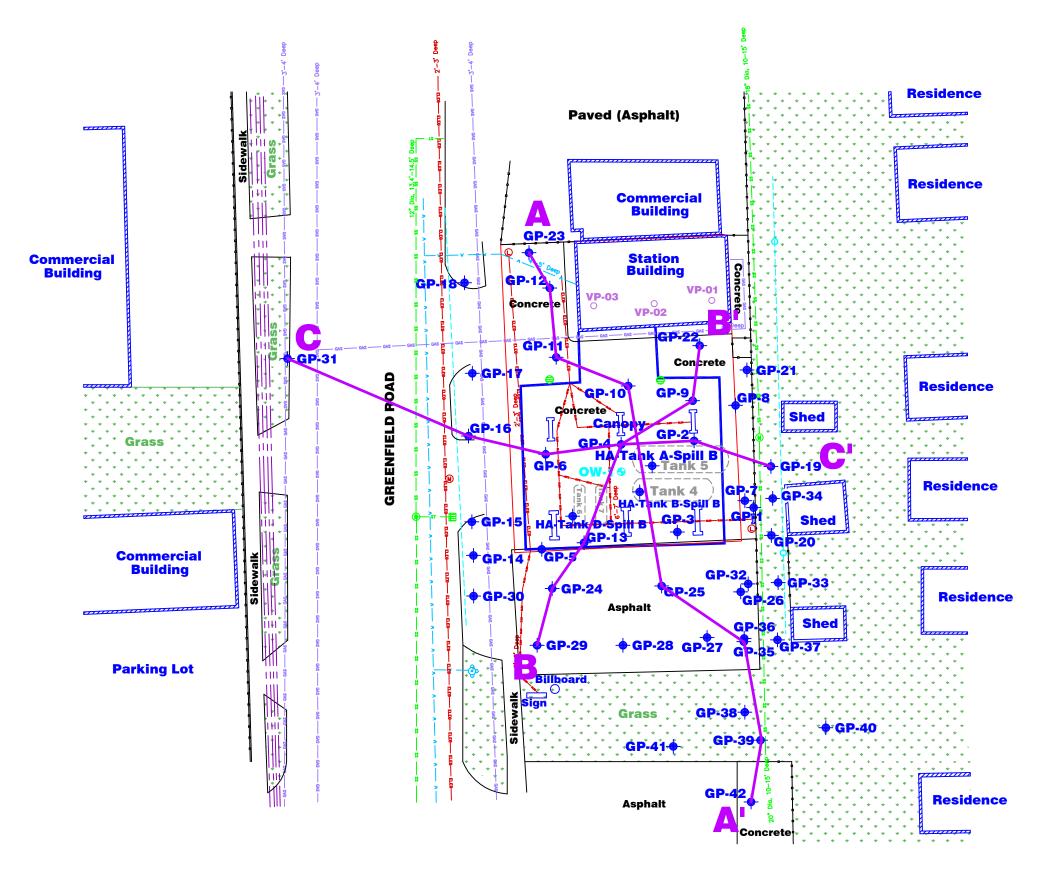
11694 Greenfield Road Detroit, Michigan

mber 2020

APPROXIMATE SCALE IN FEET

etroit, Michigan 154018.311





- MONITORING WELL LOCATION
- OPERATING WELL LOCATION
- SOIL BORING LOCATION
- SOIL GAS VAPOR PIN
- CATCH BASIN
- UTILITY MANHOLE
- UTILITY POLE
- LIGHT POLE

#### \_\_\_\_ DISPENSER ISLAND

#### - FENCE

COMBINED UNDERGROUND STORM & SANITARY SEWER LINE

UNDERGROUND WATER LINE

UNDERGROUND GAS LINE OVERHEAD UTILITIES

UNDERGROUND ELECTRIC

UNDERGROUND FIBEROPTIC

PROPERTY BOUNDARIES

\* Please note utility locations are approximate

APPROXIMATE SCALE IN FEET

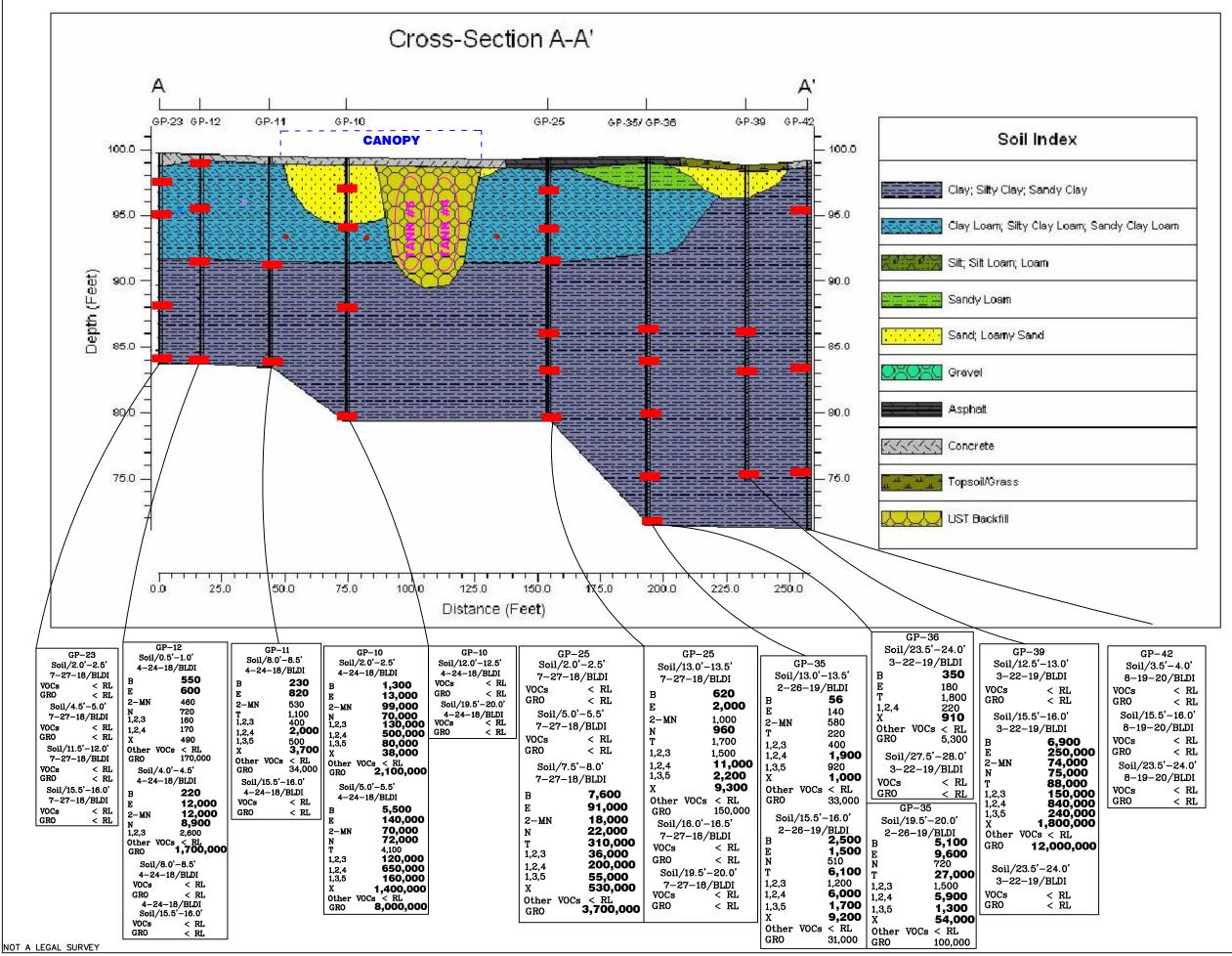
FIGURE 4A CROSS SECTION TRACE MAP

Knight Station K-311 11694 Greenfield Road Detroit, Michigan 154018.311

December 2020

VS/SJ





SOIL SAMPLE INTERVAL



- UNDERGROUND ELECTRIC LINE
- UNDERGROUND WATER LINE
- UNDERGROUND GAS LINE

n-Butylbenzene sec-Butylbenzene

Ethlybenzene

Isopropylbenzene

Naphthalene

n-Propylbenzne

Toluene

1,2,3 1,2,3-Trimethylbenzene

1,2,4-Trimethylbenzene

1.3.5-Trimethylbenzene

Total Xylenes ACE Acenaphthene

ACY Acenaphthylene

Anthracene

Benzo[a]anthracene

Benzo[a]pyrene

Benzo[b]fluoranthene

BPYL

Benzo[g,h,i]perylene

Benzo[k]fluoranthene

CH Chrysene

Dibenzo(a,h)anthracene DahA

Fluoranthene

FN Fluorene

Indeno[1,2,3-cd]pyrene

2-Methylnaphthalene

PΗ Phenanthrene

Pyrene

PΥ **PNAs** 

Polynuclear Aromatic Hydrocarbons

VOCs Volatile Organic Compounds DRO Diesel Range Organics

Gasoline Range Organics

Reporting Limit

BOLD VALUES EXCEED APPLICABLE CRITERIA

Sample Location Sample Media/Sample Depth Sample Date/Collected By Analytical Results (ug/kg)

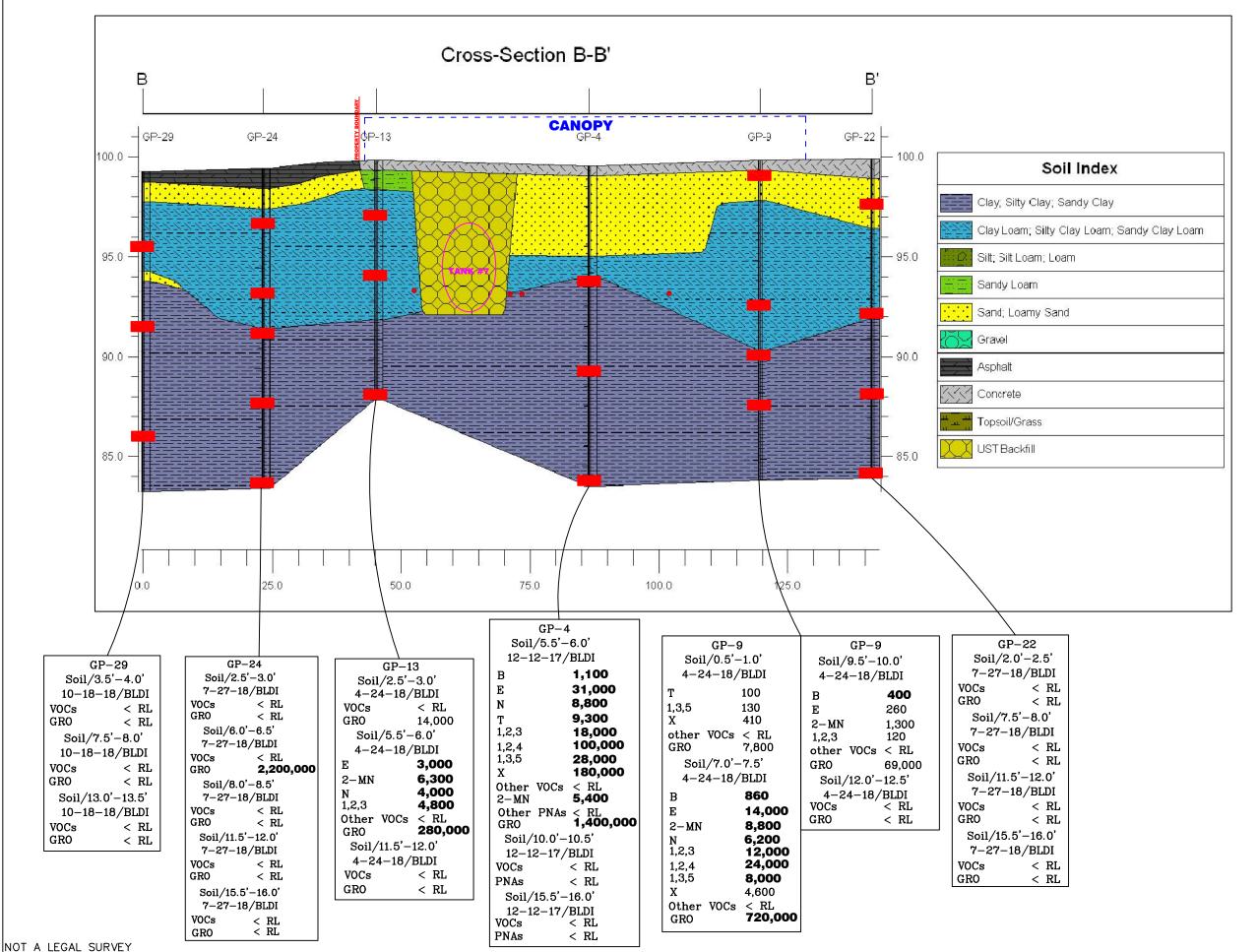
VS/SJ

### FIGURE 4B CROSS SECTION A-A'

Knight Station K-311 11694 Greenfield Road Detroit, Michigan

154018.311





SOIL SAMPLE INTERVAL



#### UNDERGROUND ELECTRIC LINE

n-Butylbenzene sec-Butylbenzene Ethlybenzene Naphthalene n-Propylbenzne 1.2.3-Trimethylbenzene 1.2.4 1.2.4-Trimethylbenzene 1,3,5 1,3,5-Trimethylbenzen **Total Xylenes** ACE Acenaphthene ACY Acenaphthylene Anthracene Benzo[a]anthracene Benzo[a]pyrene Benzo[g,h,i]perylene Benzolklfluoranthen Chrysene Dibenzo(a.h)anthracen Fluoranthene FN Fluorene Indeno[1,2,3-cd]pyrene 2-Methylnaphthalene PY Polynuclear Aromatic Hydrocarbo Volatile Organic Compounds Gasoline Range Organics Reporting Limit BOLD VALUES EXCEED APPLICABLE CRITERIA

Sample Location
Sample Media/Sample Depth
Sample Date/Collected By
Analytical Results (ug/kg)



## FIGURE 4C CROSS SECTION B-B'

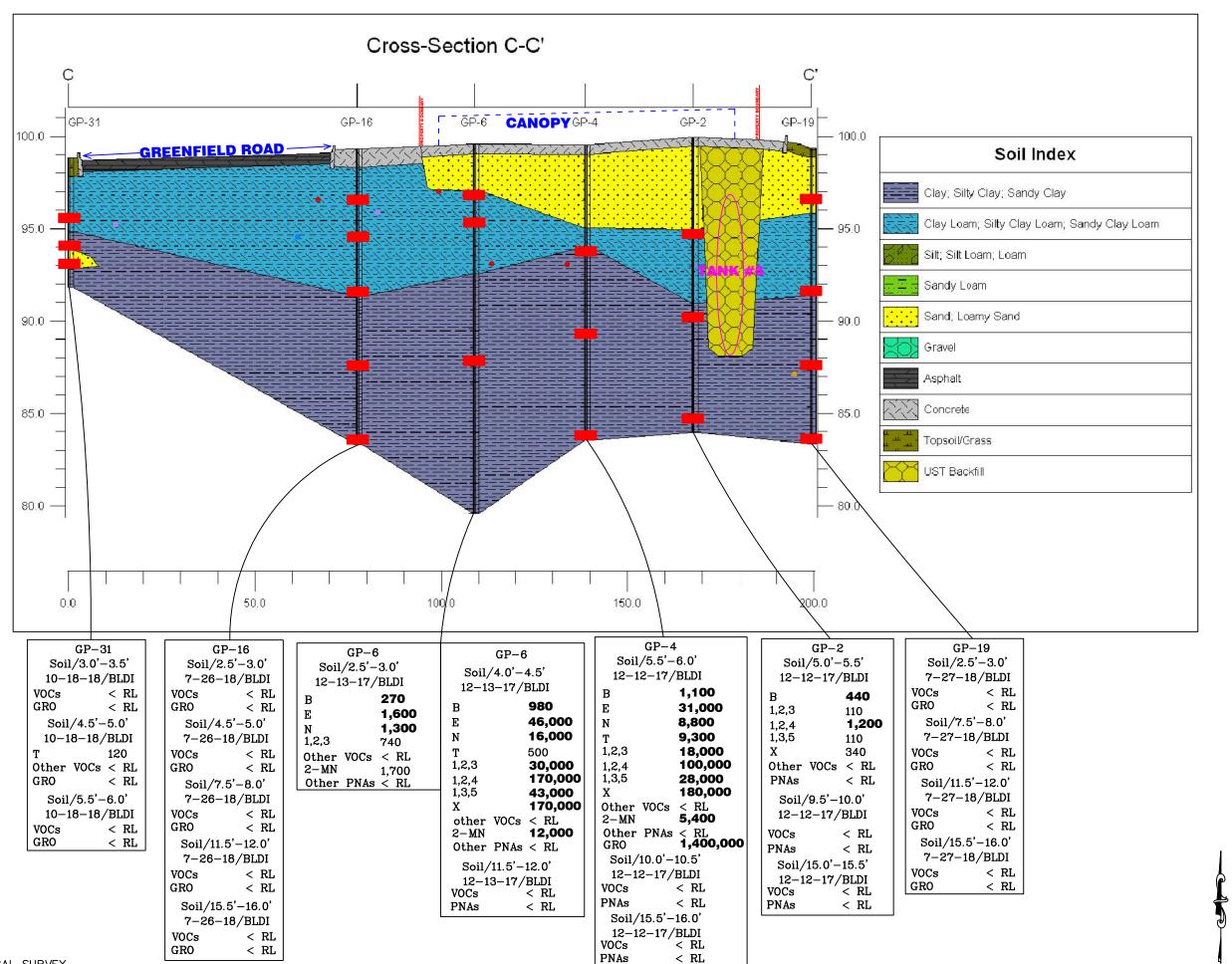
Knight Station K-311 11694 Greenfield Road Detroit, Michigan

ecember 2020

154018.311



NOT A LEGAL SURVEY



#### LEGEND

SOIL SAMPLE INTERVAL



- UNDERGROUND GAS LINE
- UNDERGROUND SEWER LINE
- UNDERGROUND WATER LINE
- UNDERGROUND ELECTRIC LINE

n-BB n-Butylbenzene
sec-BB sec-Butylbenzene
E Ethlybenzene
I Isopropylbenzene
N Naphthalene
n-PB n-Propylbenzne
T Toluene
1,2,3 1,2,3-Trimethylbenzene

1,2,4 1,2,4-Trimethylbenzene

1,3,5 1,3,5-Trimethylbenzene
X Total Xylenes
ACE Acenaphthene

ACY Acenaphthylene
ANTH Anthracene

BaA Benzo[a]anthracene
BaP Benzo[a]pyrene
BbF Benzo[b]fluoranthene

BPYL Benzo[g,h,i]perylene
BkACY Benzo[k]fluoranthene

CH Chrysene

DahA Dibenzo(a,h)anthracene

FLU Fluoranthene

FN Fluorene

IDNPY Indeno[1,2,3-cd]pyrene
2-MN 2-Methylnaphthalene

PH Phenanthrene
PY Pyrene

NAs Polynuclear Aromatic Hydrocarbons

VOCs Volatile Organic Compounds DRO Diesel Range Organics

GRO Gasoline Range Organics RL Reporting Limit

BOLD VALUES EXCEED APPLICABLE CRITERIA

Sample Location
Sample Media/Sample Depth
Sample Date/Collected By
Analytical Results (ug/kg)

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# FIGURE 4D CROSS SECTION C-C'

Knight Station K-311 11694 Greenfield Road Detroit, Michigan

December 2020

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