



Groundwater & Environmental Services, Inc.

55820 Grand River Avenue, Suite 275
New Hudson, MI 48165

T. 800.368.0337

January 5, 2021

City of Detroit
Buildings, Safety, Engineering, and Environmental Department (BSEED)
Coleman A. Young Municipal Center
4th Floor Woodward Avenue
Detroit, Michigan 48226

Re: Public Highway Institutional Control
Former Mobil #03-DEA
2600 West Davison Avenue
Detroit, Wayne County, Michigan 48238
Facility I.D. #:0-003155

To Whom it May Concern:

Groundwater & Environmental Services, Inc. (GES) on behalf of ExxonMobil Environmental and Property Solutions has prepared the enclosed Michigan Department of Environment, Great Lakes, and Energy (EGLE) Public Highway Institutional Control form (EQP 4506) for the former Mobil Station #03-DEA located at 2600 West Davison Avenue, Detroit, Michigan (site). EGLE has required this Public Highway Institutional Control in order to provide notification regarding environmental impact.

Based on the activities completed to date, residual impact is likely present in the right-of-ways/roadways of Linwood Avenue, Clements Avenue, and the Alley south of the site. However, contact with the residual impact is highly unlikely due to the existing roadways and depth of the impact. This information is required to be provided to the local unit of government that has jurisdiction over the roadway.

We are requesting a confirmation that the City has received this notification, and that there are no plans to relocate, vacate, or abandon the public highways. The agreement can be acknowledged in one of three ways:

- 1) by signing the enclosed form and returning it to me at the address listed below; or
- 2) by providing a letter on municipality letterhead; or
- 3) by providing an email to me at bklueger@gesonline.com.

Note that Public Act 451 Sec. 324.213101(5) states that the acknowledgement does not create liability or prevent the municipality from using the roadway. If you have any questions, please contact me at (800) 368-0337 x3369, or by email at bklueger@gesonline.com.

Sincerely,

Bridget Klueger
Senior Project Manager

/Enclosure

cc: Ms. Jewel Cox (ExxonMobil Oil Corporation)
GES File 03-DEA

GESonline.com

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 deq-rrd@michigan.gov, or by calling 517-284-5153.

SECTION 1. FACILITY INFORMATION:		EGLE REF. NUMBER: PHIC-RRD-213-21-002	
SITE OR FACILITY NAME: Former Mobil Station #03-DEA		SITE OR FACILITY ID NUMBER: 0-003155	
STREET ADDRESS: 2600 West Davison Avenue			
CITY: Detroit	ZIP: 48238	COUNTY: Wayne	
NAME OF PARTY PROPOSING PUBLIC HIGHWAY IC: ExxonMobil Environmental and Property Solutions		EMAIL ADDRESS: jewel.g.cox@exxonmobil.com	
STREET ADDRESS: 875 Poplar Ave. Suite 23, #353	CITY: Collierville	STATE: TN	ZIP: 38017
CONTACT PERSON: Jewel Cox	PHONE: 901-233-4112	FAX:	

MDEQ District Office: Cadillac Gaylord Grand Rapids Jackson Kalamazoo Lansing
 Saginaw Bay SE Michigan Upper Peninsula

SECTION 2. AFFECTED PUBLIC HIGHWAY INFORMATION:

- Name of affected public highway(s) and nearest intersection: Clements Ave, Linwood Ave, the alley. Closest intersection is Linwood Ave at Davison Ave
- Known or suspected contaminant(s) type (Check all that apply):
 Petroleum Volatile organic compounds Metals Other
- Is residual/mobile nonaqueous-phase liquid present in the affected public highway: YES NO
- Media contaminated:
 - Soil Depth to contaminated soil: 2-17' below ground surface (bgs)
 - Groundwater Depth to contaminated groundwater: 1-10' bgs Predominant groundwater flow direction: South-Southwest
- 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 north arrow.
 - A graphical scale bar and scale statement (e.g. 1"=50').
 - 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.
 - The public highway(s) name identified.
 - A statement identifying the Township, Range, Section, and Quarter Section where the parcel is located.
 - The limits of the affected public highway plotted to scale. This area should be hatched and labeled appropriately.
 - The location of significant site features such as buildings, drives, parking lots, and road surface.
 - 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.

6. Provide a complete list that identifies all parties with ownership and possessory or use property interests related to the public highway (including owners of real property, easement holders, utility franchise holders, and owners or operators of public utilities):

City of Detroit Department of Public Works
City of Detroit Water and Sewerage Department (Water and Sewer)
Michigan Consolidated Gas Company (Natural Gas)

- a. Are any of the parties listed above affected by the contamination: YES NO
b. Have all of the parties above affected by the contamination received notification of the existing conditions as part of a corrective action plan or pursuant to the due care requirements: YES NO

7. Exposure risks:

- a. Due to groundwater contamination (Check all that apply):
 Drinking water Indoor air inhalation Surface water
b. Due to soil contamination (Check all that apply):
 Direct contact Ambient air Inhalation Indoor air inhalation Leaching from soil to groundwater
 Direct transport to surface water Soil excavation/relocation

Based on the exposure risks identified above, insert a paragraph below which describes the affected media, the nature and extent of the hazardous substances, the cleanup criteria exceeded, the routes of potential exposure, any response activities or corrective actions that have been taken to address the contamination, and any activities that could result in exposure to hazardous substances that would cause this institutional control to not be protective of public health, safety, and welfare (e.g. use of the groundwater for consumption, irrigation, or any other use, management and disposal of groundwater for dewatering for construction purposes; any excavation or intrusive activity that would result in contaminated soils to be placed at the ground surface or otherwise exacerbate the extent of contamination)

Some residual hydrocarbon impact may be present beneath the southern right-of-way/roadway of Linwood Avenue, the eastern right-of-way/roadway of Clements Avenue, and the alley southwest of the station. The shaded areas in/adjacent to the rights-of-ways have the potential to have soil and/or groundwater concentrations above Michigan Department of Environment, Great Lakes, and Energy (EGLE) criteria.

Soil impact at the rights-of-ways/roadways does not exceed Direct Contact criteria. Soil exceeding the EGLE Non-Residential Drinking Water (DW) Protection criteria is located at the south/southwest edges of the station property at SB-15, GP-10, GP-11, GP-13, MW-7, MW-8, MW-9R, and MW-12, and at the northern edge of the station property at MW-23 and MW-27. Groundwater exceeds Drinking Water criteria at MW-8, MW-9R, MW-18, MW-19, MW-23, MW-27, RW-2, and RW-3, and exceeds Groundwater Surface (GSI) criteria for groundwater based on data collected from MW-9R, MW-18, RW-2, and RW-3. Actions have been taken to reduce the impact including vacuum truck extraction of impact, installation and operation of a remediation system, vapor assessment, deed restrictions, sampling, and delineation.

An exposure pathway evaluation was completed to evaluate the risk to human health and the environment. While soil impact may be present at the roadways, it is at a depth of 2 feet and deeper, so it would only be temporarily relevant during any utility or roadwork at depths greater than 2 feet. Potential exposure scenarios for groundwater would be during construction work at depths greater than 1 foot below grade. Currently, there is no exposure to this impact.

The groundwater should not be used. Proper personal protective equipment (PPE) should be used during utility or construction work to prevent exposure to the soil. Proper management and disposal of both groundwater and soil is required and neither should be placed at the ground surface in a manner that would exacerbate the impact.

Vapors from groundwater or soil are not anticipated to be an exposure route at the roadways due to the presence of the roadway itself, and the resulting lack of buildings or basements in the roadway.

There are no known plans to move, relocate, or abandon the roadways (Clements Avenue, Linwood Avenue, and the alley southwest of the station). This public highway institutional control mechanism is being provided to communicate these conditions and to prevent potential exposures.

SECTION 3. STORM SEWER SYSTEM CERTIFICATION:

Is contamination present in or does the contamination have the potential to enter the storm sewer system (including separate storm sewer systems and combined sewers) as a result of the release from the underground storage tank system:

YES NO

There is no current data indicating impact in the combined sewer. The groundwater concentrations at MW-9R, MW-18, RW-2, and RW-3, located at the southwest corner of the station property, exceed the GSI Risk Based Screening Levels (RBSLs). There could be some potential for groundwater to enter the combined storm and sanitary sewer if groundwater seeped into the sewer.

Any water in the sewer is treated via the municipal treatment system prior to discharge to any surface water body.

SECTION 4. SUBMITTER INFORMATION:

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.

Signature	Print	Date
	Bridget Klueger, on behalf of ExxonMobil Environmental and Property Solutions	
Name of Company (if applicable)	Address, City, State, Zip	
Groundwater & Environmental Services, Inc.	55820 Grand River Avenue, Suite 275, New Hudson, MI 48165	
Phone Number	Fax Number	Email Address
(800) 368-0337		bklueger@gesonline.com

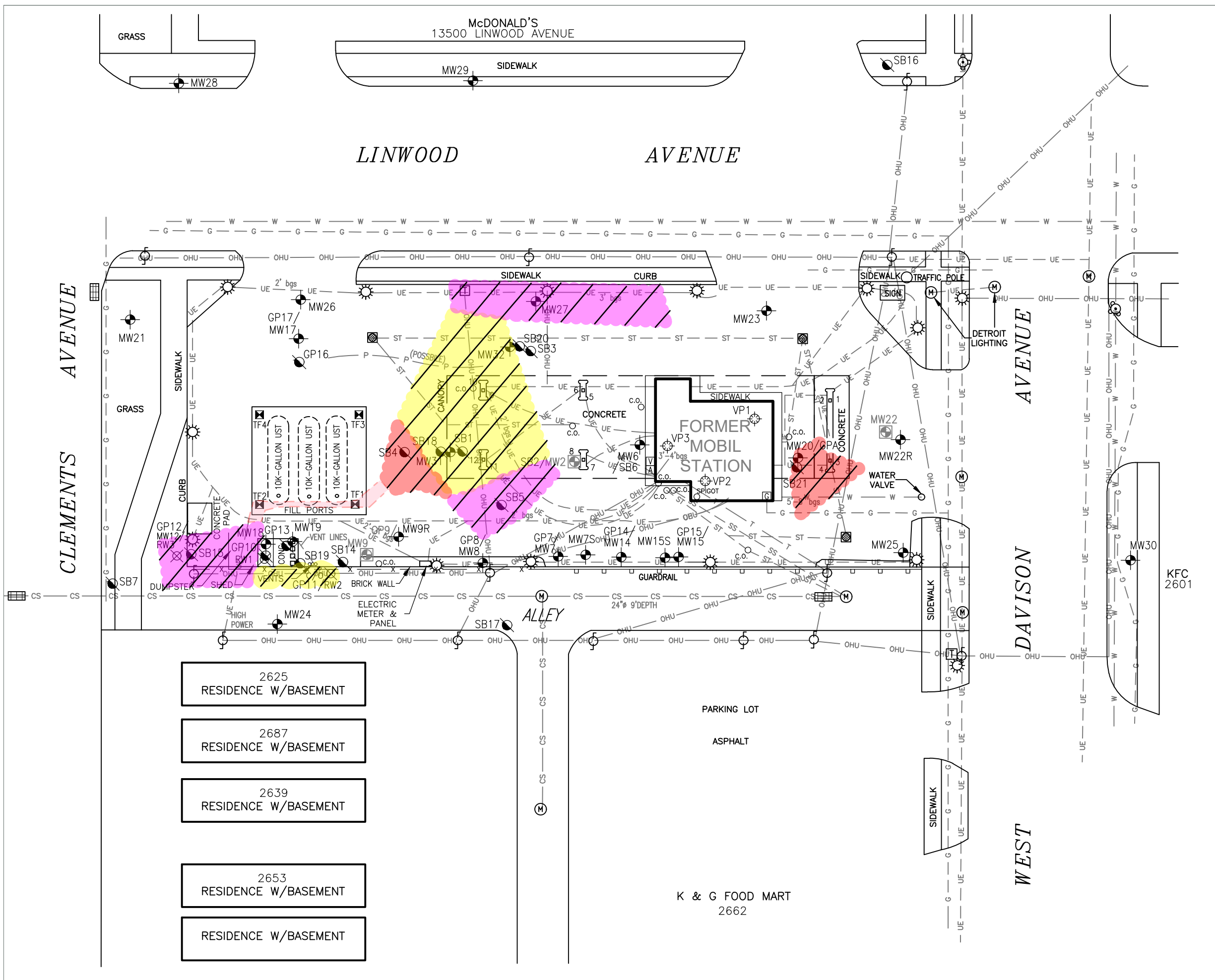
SECTION 5. COUNTY ROAD COMMISSION OR LOCAL UNIT OF GOVERNMENT CONFIRMATION:

Name of county road commission or local unit of government: City of Detroit

The aforementioned local unit of government 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 local unit of government.

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	
The City of Detroit Buildings, Safety, Engineering, and Environmental Department (BSEED)	Coleman A Young Municipal Center 4 th Floor Woodward Avenue, Detroit, MI 48226	
Phone Number	Fax Number	Email Address
(313) 224-2733		

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LEGEND

- DISPENSER ISLAND
- CATCH BASIN
- YARD DRAIN
- UTILITY MANHOLE
- UTILITY POLE
- CLEAN OUT
- AREA LIGHT
- AIR PUMP
- VACUUM
- RECOVERY WELL
- MONITORING WELL
- SUMP/TANK FIELD WELL
- DESTROYED WELL
- SOIL VAPOR EXTRACTION POINT
- UNDERGROUND COMBINATION SEWER LINE
- UNDERGROUND SANITARY SEWER LINE
- UNDERGROUND STORM SEWER LINE
- UNDERGROUND ELECTRIC LINE
- UNDERGROUND WATER LINE
- UNDERGROUND GAS LINE
- UNDERGROUND PRODUCT LINE
- OVERHEAD ELECTRIC LINE
- SOIL BORING

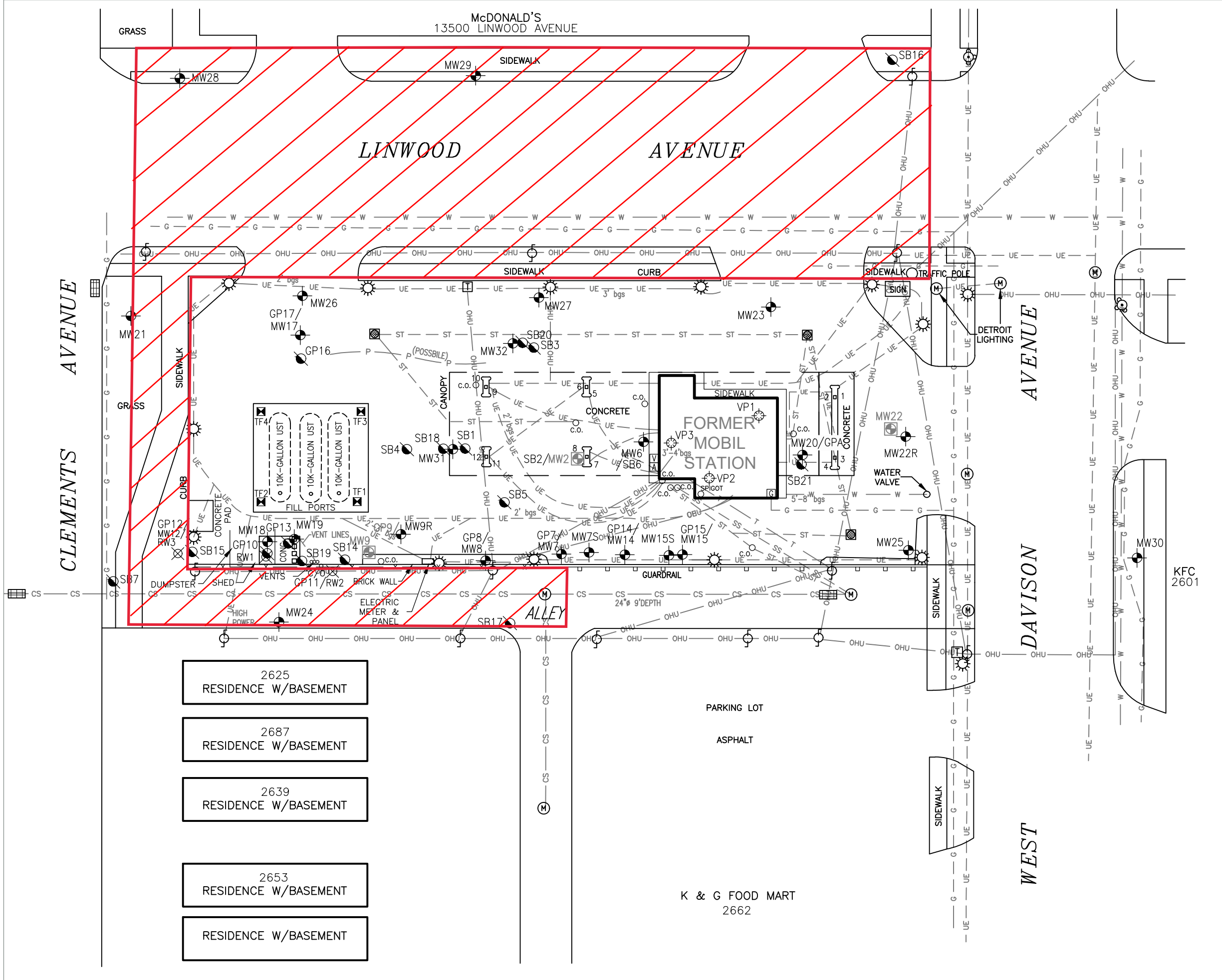
- Residual Impact - Sum (BTEX * 40) > 900 ppm
- Residual Impact - Sum (BTEX * 40) > 350 ppm
- Residual Impact - Sum (BTEX * 40) > 250 ppm
- Inferred migration (no soil data)

Note:

All R.O.W. along Linwood & Davison Avenues are cement.

Residual Extent of LNAPL	
ExxonMobil Oil Corporation Former Mobil #03-DEA 2600 West Davison Avenue Detroit, Michigan	
Drawn E.V. Designed	Date 09/25/20 Figure 1
Approved	Scale In Feet (Approximate) 0 30
<p style="text-align: center; font-size: small;">Groundwater & Environmental Services, Inc.</p>	

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LEGEND

- DISPENSER ISLAND
- CATCH BASIN
- YARD DRAIN
- UTILITY MANHOLE
- UTILITY POLE
- CLEAN OUT
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- UNDERGROUND SANITARY SEWER LINE
- UNDERGROUND STORM SEWER LINE
- UNDERGROUND ELECTRIC LINE
- UNDERGROUND WATER LINE
- UNDERGROUND GAS LINE
- UNDERGROUND PRODUCT LINE
- OVERHEAD ELECTRIC LINE
- SOIL BORING

PUBLIC HIGHWAY INSTITUTIONAL CONTROL AREA

Note:

All R.O.W. along Linwood & Davison Avenues are cement.

Public Highway Institutional Control Area Map

ExxonMobil Oil Corporation
Former Mobil #03-DEA
2600 West Davison Avenue
Detroit, Michigan

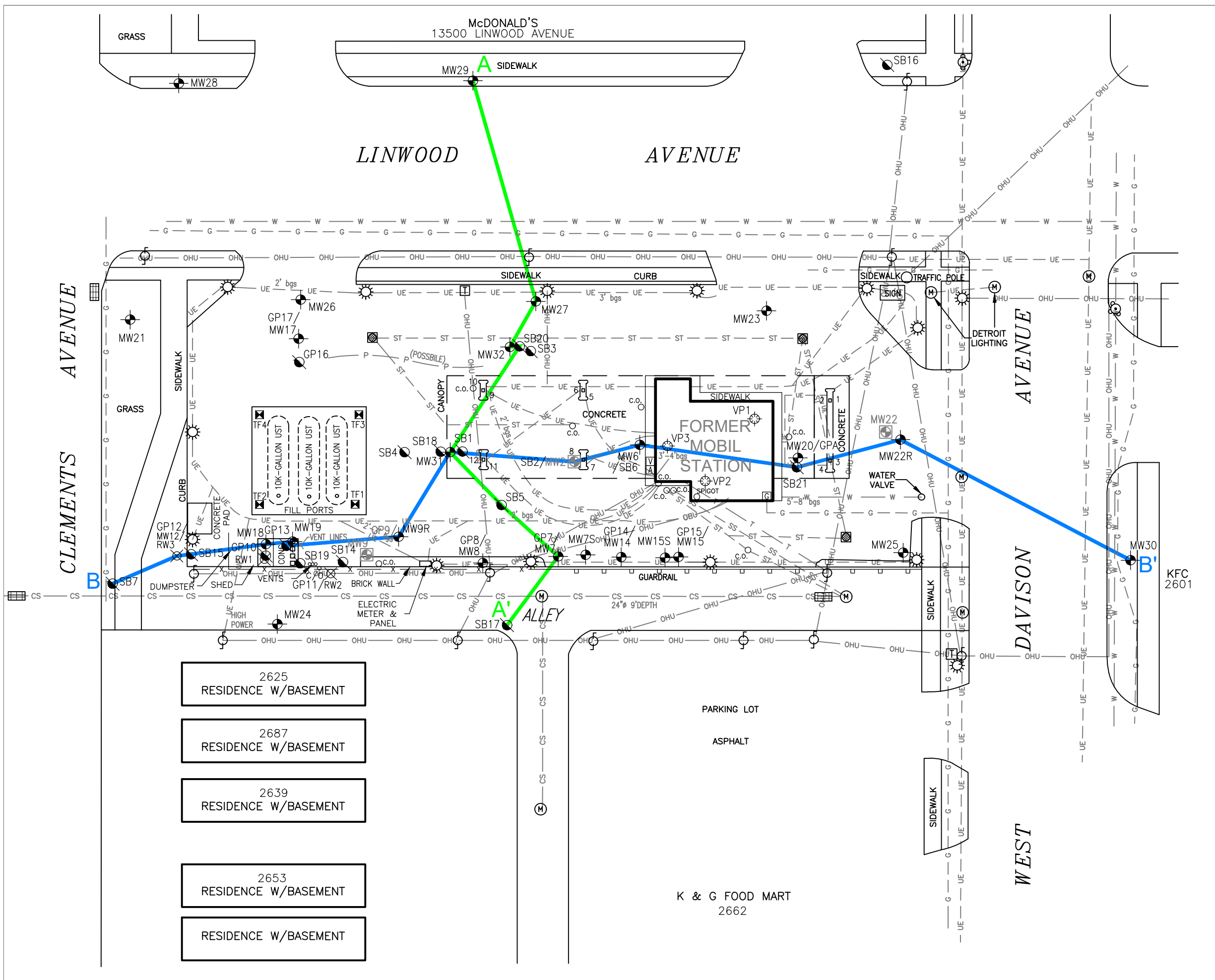
Drawn E.V. Designed Approved	Date 09/25/20 Figure 2
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Scale In Feet (Approximate)

0 30

GES
Groundwater & Environmental Services, Inc.

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- LEGEND**
- DISPENSER ISLAND
 - CATCH BASIN
 - YARD DRAIN
 - UTILITY MANHOLE
 - UTILITY POLE
 - CLEAN OUT
 - AREA LIGHT
 - AIR PUMP
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 - RECOVERY WELL
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 - UNDERGROUND GAS LINE
 - UNDERGROUND PRODUCT LINE
 - OVERHEAD ELECTRIC LINE
 - SOIL BORING

Note:
All R.O.W. along Linwood & Davison Avenues are cement.

Cross-Section Location Map

ExxonMobil Oil Corporation
Former Mobil #03-DEA
2600 West Davison Avenue
Detroit, Michigan

Drawn E.V. Designed Approved	Date 09/25/20 Figure 3
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Scale In Feet (Approximate)

Groundwater & Environmental Services, Inc.

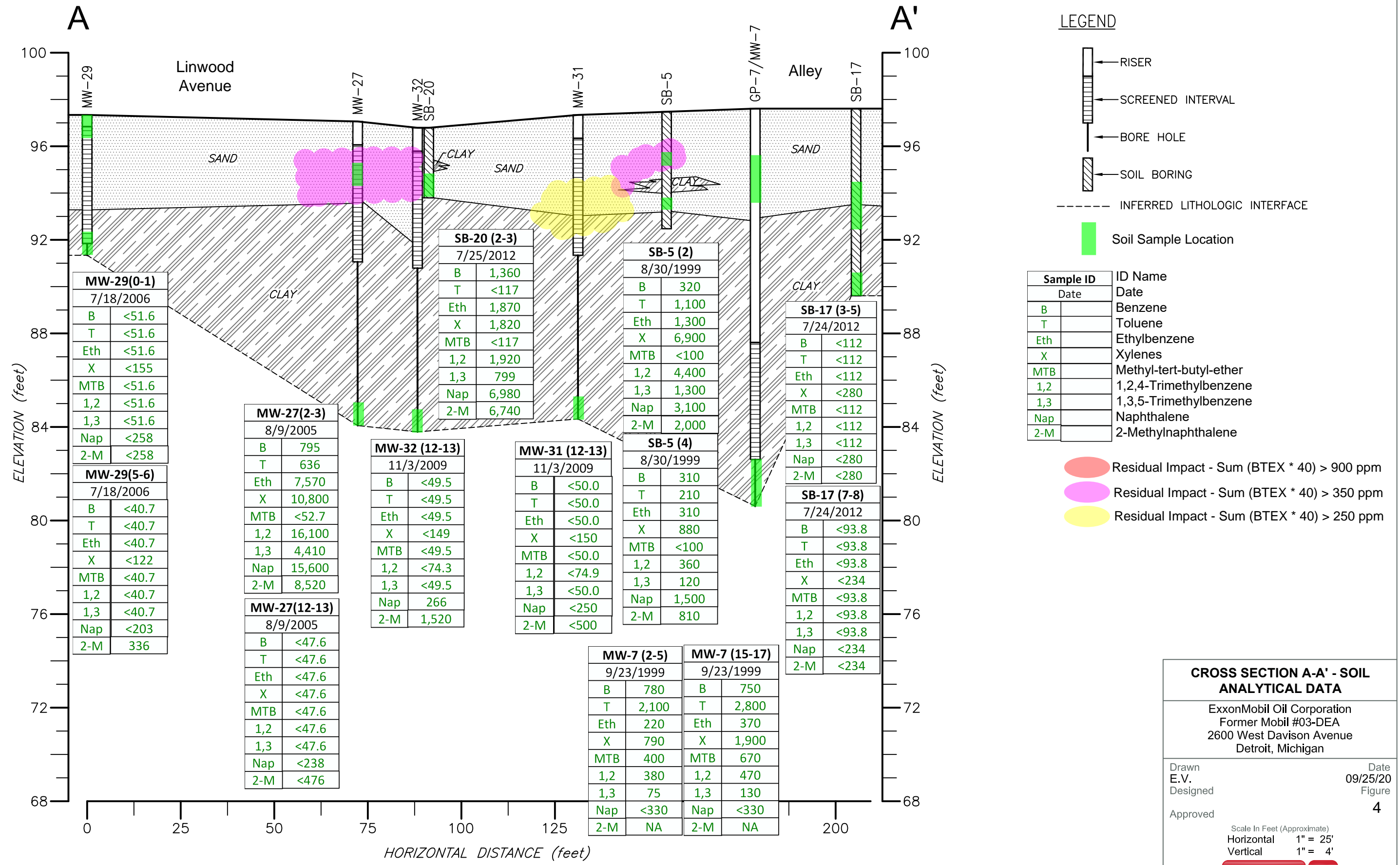
- 2625
RESIDENCE W/BASEMENT
- 2687
RESIDENCE W/BASEMENT
- 2639
RESIDENCE W/BASEMENT
- 2653
RESIDENCE W/BASEMENT
- RESIDENCE W/BASEMENT

PARKING LOT
ASPHALT

K & G FOOD MART
2662

KFC
2601

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CROSS SECTION A-A' - SOIL ANALYTICAL DATA

ExxonMobil Oil Corporation
 Former Mobil #03-DEA
 2600 West Davison Avenue
 Detroit, Michigan

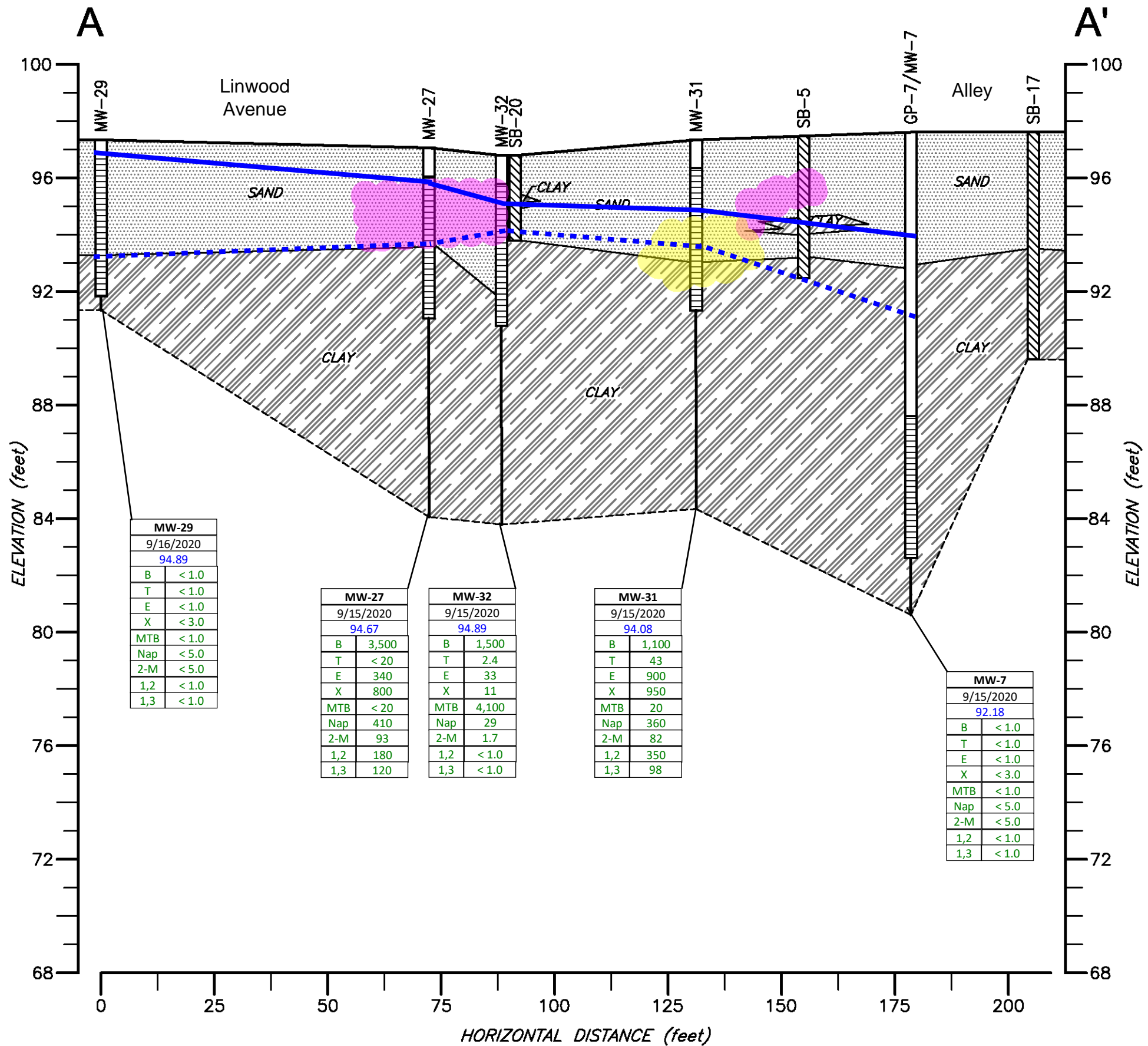
Drawn E.V.	Date 09/25/20
Designed	Figure 4
Approved	

Scale In Feet (Approximate)
 Horizontal 1" = 25'
 Vertical 1" = 4'



Groundwater & Environmental Services, Inc.

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LEGEND

- RISER
 - SCREENED INTERVAL
 - BORE HOLE
 - SOIL BORING
 - INFERRED LITHOLOGIC INTERFACE
 - Residual Impact - Sum (BTEX * 40) > 900 ppm
 - Residual Impact - Sum (BTEX * 40) > 350 ppm
 - Residual Impact - Sum (BTEX * 40) > 250 ppm
- | Sample ID |
|-------------------------------|
| GW Elevation (ft) |
| Benzene (µg/L) |
| Toluene (µg/L) |
| Ethylbenzene (µg/L) |
| Total Xylenes (µg/L) |
| MTBE (µg/L) |
| Naphthalene (µg/L) |
| 2-Methylnaphthalene (µg/L) |
| 1,2,4-Trimethylbenzene (µg/L) |
| 1,3,5-Trimethylbenzene (µg/L) |
- Groundwater Elevation (High)
 - Groundwater Elevation (Low)

MW-29	
9/16/2020	
94.89	
B	< 1.0
T	< 1.0
E	< 1.0
X	< 3.0
MTB	< 1.0
Nap	< 5.0
2-M	< 5.0
1,2	< 1.0
1,3	< 1.0

MW-27	
9/15/2020	
94.67	
B	3,500
T	< 20
E	340
X	800
MTB	< 20
Nap	410
2-M	93
1,2	180
1,3	120

MW-32	
9/15/2020	
94.89	
B	1,500
T	2.4
E	33
X	11
MTB	4,100
Nap	29
2-M	1.7
1,2	< 1.0
1,3	< 1.0

MW-31	
9/15/2020	
94.08	
B	1,100
T	43
E	900
X	950
MTB	20
Nap	360
2-M	82
1,2	350
1,3	98

MW-7	
9/15/2020	
92.18	
B	< 1.0
T	< 1.0
E	< 1.0
X	< 3.0
MTB	< 1.0
Nap	< 5.0
2-M	< 5.0
1,2	< 1.0
1,3	< 1.0

Cross Section A-A'
Groundwater Analytical Data

ExxonMobil Oil Corporation
Former Mobil #03-DEA
2600 West Davison Avenue
Detroit, Michigan

Drawn CEA	Date 10/1/2020
Designed	Figure 5
Approved	

Scale In Feet (Approximate)
Horizontal 1" = 25'
Vertical 1" = 4'

Groundwater & Environmental Services, Inc.