

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 MDEQ 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: MDEQ REF. NUMBER.: LROW-RRD-213-18-004

SITE OR FACILITY NAME: Former Amoco Service Station No. 5882 SITE OR FACILITY ID NUMBER: 00005656

STREET ADDRESS: 800 East Seven Mile Road

CITY: Detroit ZIP: 48203 COUNTY: Wayne

NAME OF PARTY PROPOSING PUBLIC HIGHWAY IC: BP Products North America Inc. EMAIL ADDRESS: Tiffany.Linder@arcadis.com

STREET ADDRESS: 28550 Cabot Drive, Suite 500 CITY: Novi STATE: MI ZIP: 48377

CONTACT PERSON: Tiffany Linder (As Agent for BP) PHONE: 810-225-1928 FAX: 248-994-2241

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

SECTION 2. AFFECTED PUBLIC HIGHWAY INFORMATION:

1. Name of affected public highway(s) and nearest intersection: East Seven Mile Road, I-75 Service Drive and East Seven Mile Road

2. Known or suspected contaminant(s) type (Check all that apply):

Petroleum Volatile organic compounds Metals 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 to 9 feet below ground surface (bgs)

b. Groundwater Depth to contaminated groundwater: 1 to 8 feet bgs Predominant groundwater flow direction: Indiscernible/radial

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 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, Environmental Affairs; City of Detroit, Water and Sewerage Engineering Department; City of Detroit, Department of Public Works; and Michigan Consolidated Gas Company (DTE).

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).

Residual contaminants present are associated with a gasoline release under Michigan Department of Environmental Quality (MDEQ) Release Numbers C-0780-85 and C-0265-99. Soil impacts are present at depths ranging from approximately 1 to 9 feet bgs, and groundwater impacts are present within monitoring wells at approximately 1 to 8 feet bgs. Soil impacts above MDEQ Drinking Water Protection, Groundwater Surface Water Interface (GSI) Protection Risk-Based Screening Levels (RBSLs) may be present in East Seven Mile Road based on impacts observed on the adjacent property (**Figure 2 and Table 1 – refer to previous April 2018 submittal**). Based on field screening evidence, residual light non-aqueous phase liquid (LNAPL) is present may be present in East Seven Mile Road based on impacts observed on the adjacent property as depicted in **Figure 2 – refer to previous April 2018 submittal**. Additionally, groundwater impacts above MDEQ Drinking Water and GSI RBSLs may be present within the ROW of East Seven Mile Road based on impacts observed on the adjacent property (**Figure 3 and Table 2 – refer to previous April 2018 submittal**). The location of cross sectional figures prepared depicting the vertical extent of soil impacts within the ROW is presented on **Figure 4A and Figures 4B (refer to previous April 2018 submittal)** are the cross sections.

- Management and disposal of groundwater for short-term dewatering for construction purposes should be conducted in accordance with all applicable local, state, and federal laws and regulations and in a manner that does not cause or result in a new release; exacerbation of existing contamination; or any other violation of local, state, and federal environmental laws and regulations.
- Management of all contaminated soils, media, and/or debris located in the road ROW will be in accordance with the applicable requirements of Section 20120c or Section 21304b of the Natural Resource Environmental Protection Act (NREPA); Part 111, Hazardous Waste Management, of the NREPA; Subtitle C of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C Section 6901 et seq; the administrative rules promulgated thereunder, and all other relevant state and federal laws.
- Since no building structures for human occupancy exist in the ROW and are not planned to be constructed in the ROW of East Seven Mile Road, vapor intrusion does not pose a risk.

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

If yes, please provide information below and attach any drawings, tables, etc. that clearly identifies the nature and extent of the contamination that enters or has the potential to enter the storm sewer system.

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
	Tiffany A. Linder (As Agent for BP)	6/13/2019
Name of Company (if applicable)	Address, City, State, Zip	
Arcadis of Michigan, LLC	28550 Cabot Drive, Suite 500, Novi MI 48377	
Phone Number	Fax Number	Email Address
810-225-1928	248-994-2241	Tiffany.Linder@arcadis.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 **City of Detroit** 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 **City of Detroit**.

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
