



JENNIFER M. GRANHOLM
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING

Bonney-Graceland



STEVEN E. CHESTER
DIRECTOR

March 16, 2009

Mr. Matthew Zimmerman
Varnum Riddering Schmidt Howlett
Bridgewater Place
P.O. Box 352
Grand Rapids, Michigan 49501-0352

Mr. Kevin Bonney
9107 Worden Road
Beulah, Michigan 49617

Dear Mr. Zimmerman and Mr. Bonney:

SUBJECT: Graceland Fruit, Inc. (GFI) / Bonney Disposal Pit
Remedial Investigation/Feasibility Study Work Plan

The Remedial Investigation/Feasibility Study (RI/FS) Work Plan (WP) was submitted by Fishbeck, Thompson, Carr, and Huber (FTC&H) on behalf of Graceland Fruit, Inc./Bonney Bros. Pumping Company (GFI/BBPC) on March 12, 2009. Investigative and remedial work at the site is being conducted in accordance with the Administrative Consent Judgment (CJ) between GFI/BBPC and the Michigan Department of Environmental Quality (DEQ). In accordance with Section VII of the CJ, the RI/FS WP is hereby disapproved.

The WP is being disapproved because of the limited scope of the proposed work. The installation of two monitoring wells using mud rotary techniques would not be able to produce a RI/FS report that will comply with Rules R 299.5528 and R 299.5530 of the Administrative Rules of Part 201, Environmental Remediation of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended, as appropriate to the facility. In accordance with Sections 6.5(b) and 7.3 of the CJ, GFI/BBPC must submit a revised WP within 30 days following your receipt of this letter outlining the steps that will be taken to comply with Section 6.5(a) of the CJ.

Revisions to the current WP shall include the following;

A proposal for a minimum of three additional vertical aquifer sampling locations. Each location shall have intervals sampled no greater than every 10 feet. Geologic deposits shall be logged continuously using either a split spoon sampler or sonic sampling device. A minimum of two monitoring wells (nested) shall be installed at each location. These three locations shall be placed near the anticipated leading and side edges of the plume.

Monitoring wells MW-7S and MW-7D shall be installed at the proposed location. This location shall be initially sampled utilizing a VAS technique. Sample intervals shall not exceed 10 feet. Geologic deposits shall be continuously logged using either a split spoon sampler or sonic sampling device. Well installation shall occur at the intervals approved by the DEQ.

Sampling of wells shall be in accordance with Attachment 5 of the October 22, 2004 MDEQ Operational Memorandum No. 2. All samples shall be unfiltered. Filtered samples may be taken in addition to unfiltered samples.

If GFI/BBPC wishes to use a site specific background concentration above generic residential Part 201 criteria, then a minimum of three background wells shall be installed at the DEQ approved locations and depths. These wells shall be sampled quarterly for two years and a site specific background determined and submitted to the DEQ for approval.

Current site data suggests that GFI/BBPC may be responsible for the elevated metals in nearby residential wells. In accordance with Rule R299.5526 of Part 201, please supply any previously sampled resident with exceedances of iron or manganese in their residential well above Part 201 health based criteria with bottle water as an interim response measure.

If you have any questions, or wish to discuss this further, please feel free to contact me at 517-241-1358.

Sincerely,



Eric A. Chatterson
Groundwater Permits Unit
Permits Section
Water Bureau

Attachment

cc: Mr. Dave Filipiak, FTC&H
Mr. Doug Plumstead, GFI
Mr. Joseph Quandt, Zimmerman, Kuhn, Darling, Boyd, Quandt and Phelps, PLC
Mr. Mike Stifler, DEQ-Cadillac District Office
Ms. Janice Heuer, DEQ-Cadillac District Office
Mr. Rick Rusz, DEQ
Mr. James Janiczek, DEQ

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