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GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
EXECUTIVE OFFICE



PHILLIP D. ROOS
DIRECTOR

October 13, 2026

VIA EMAIL

The Honorable Debbie Dingell
United States House of Representatives
Washington, DC 20515

Dear Congresswoman Dingell:

SUBJECT: University of Michigan-Los Alamos National Laboratory Advanced
Research Computing Center, Ypsilanti Township, Michigan

Thank you for your letter of September 16, 2026, regarding the University of Michigan-Los Alamos National Laboratory Advanced Research Computing Center (herein referred to as the Center) in Ypsilanti Township, Michigan. The Michigan Department of Environment, Great Lakes, and Energy (EGLE) appreciates this opportunity to address your concerns regarding the environmental status of the Center properties and the nearby Textile Road Dumpsite (EGLE Location ID 81000038) as it relates to the proposed Center development. We share your commitment to protecting human health and the environment here in Michigan.

Below is a brief summary of the Textile Road Dumpsite (herein referred to as the Textile Road Site) history and our responses to your questions, which have been addressed individually. To clarify, the Textile Road Site is a separate and distinct property from the properties acquired by the University of Michigan for the proposed Center, and to the best of EGLE's knowledge, they do not have related ownership or operational history.

Textile Road Site History

The Textile Road Site is located at the southeast corner of Textile and Bunton Roads in Ypsilanti Township, Washtenaw County, Michigan. It was discovered in the 1980s that some of the mine pits were backfilled with industrial waste, which contributed to the

contamination at the site. During the 1980s, drums containing polychlorinated biphenyls (PCBs) and other chemicals were removed from the site either by the United States Environmental Protection Agency (USEPA) or the Michigan Department of Natural Resources (MDNR; currently known as EGLE). The USEPA cleanup began in October 1999 and was completed in June 2000. The project costs were paid for by the responsible parties (RPs) under an Administrative Order of Consent (AOC) with the USEPA (Docket No. V-W-99-C-562). The RPs named in the AOC include Holtzman-Silverman Realty Co., General Motors Corporation, and Ford Motor Company. General Motors Corporation restructured their legacy environmental sites into the Revitalizing Auto Communities Environmental Response (RACER) Trust during bankruptcy in 2011. Based on information contained within EGLE's files, the Textile Road Site is currently a RACER Trust property that the USEPA manages due to their previous involvement at the site.

The USEPA supervised cleanup included excavation and disposal of approximately 14,000 cubic yards of contaminated soil and approximately 330 gallons of PCB-contaminated oil. Depending on the PCB levels in the contaminated soil, the material was sent to one of the two USEPA-approved hazardous waste landfills in Michigan or used as backfill material at the Textile Road Site. After excavation, the commercially zoned portion of the site was backfilled and covered with 6 to 8 inches of topsoil and seeded. According to the AOC, the RPs were required to operate and maintain groundwater monitoring wells and the vegetated cover. The last discussion between the USEPA and EGLE was in 2013 regarding a draft Restrictive Covenant (RC) for the Textile Road Site. EGLE does not possess records indicating whether the RC for the Textile Road Site was filed with the Register of Deeds (further discussion regarding the RC is below).

EGLE Response to September 16, 2026, Letter

1. What contamination remains at or near this proposed site?

A description of contamination identified at the proposed Center property and the Textile Road Site are provided below.

Known Contamination – Proposed Center

A description of contamination identified at the proposed Center property was included in two Baseline Environmental Assessments (BEAs) for 10635 Textile Road (EGLE Location ID 81000985) and 10221 Textile Road (EGLE Location ID 81000971). The

BEAs were prepared on behalf of the Regents of the University of Michigan in December 2024 and March 2026. Information contained within the BEAs indicate that the properties were originally developed in the early 1900s as part of a farmstead, which was no longer present by the 1960s. From the 1960s, the properties contained wooded land with a baseball field present at 10221 Textile Road. The property located at 10635 Textile Road contained a railroad spur from at least the mid-1970s until prior to 2005. Both properties have been vacant since at least 2005. Recognized environmental conditions (RECs) identified during the Phase I Environmental Site Assessments (ESAs) completed for the properties included (1) historical uses of adjoining properties (Ford Rawsonville Plant to the south and 10885 Textile Road located to the east), (2) the former presence of a railroad spur on the 10635 Textile Road Property, and (3) an abandoned vehicle observed in the wooded area at 10635 Textile Road.

A subsurface investigation was completed on each property to investigate the identified RECs. These investigations included submitting soil and groundwater samples for laboratory analysis of volatile organic compounds (VOC), polynuclear aromatic compounds (PNAs), and Michigan 10 metals¹. Additionally, select soil and groundwater samples were analyzed for PCBs. Soil gas samples were also collected from both properties and analyzed for VOCs. Laboratory analytical results for soil and groundwater samples collected were non-detect for VOCs, PNAs, and PCBs. Soil sample results identified metals (arsenic, total chromium, and silver) from 0.5 feet to 3 feet below ground surface (bgs) in the southeastern portion of 10635 Textile Road (EGLE Location ID 81000985). Additionally, samples collected from the southern and western property boundaries of 10221 Textile Road identified metals (arsenic, mercury, and silver) in soil samples collected from 2.5 feet to 7 feet bgs.

For certain metals, concentrations may be naturally occurring, and background may be substituted as criteria if higher than the calculated cleanup criterion. Although identified as contaminants in the BEA reports, three of the metals identified in soil were below background levels. Concentrations of arsenic in soil at both properties are below the regional background levels for this area of Washtenaw County. Concentrations of silver detected at both properties are below the Statewide Default Background Level (SDBL). Additionally, concentrations of mercury in soil at 10221 Textile Road were below the SDBL.

Laboratory analytical results for total chromium at 10635 Textile Road are also below the SDBL for chromium III; however, since the laboratory analysis did not differentiate

¹ Michigan 10 metals include arsenic, barium, cadmium, total chromium, copper, lead, mercury, selenium silver, and zinc

between chromium III and chromium VI, comparison to EGLE Residential Cleanup Criteria defaults to chromium VI criteria, which is the more stringent criteria of the two chromium isomers for which criteria has been promulgated. Concentrations of total chromium are above the Groundwater to Surface Water Interface Protection (GSIP) criteria for chromium VI.

Groundwater was sampled at two of the investigated locations on 10635 Textile Road and contaminants were non-detect at these locations. At 10221 Textile Road, groundwater was sampled at three of the investigated locations. Lead was detected from 9 feet to 14 feet bgs above the Residential Drinking Water Criteria and GSIP Criteria at this location. The remaining two groundwater sample results were non-detect for metals.

Laboratory analytical results for the soil gas sample collected at 10635 Textile Road were below Residential Volatilization to Indoor Air Pathway (VIAP) Screening Levels (SLs). Analytical results for the four soil gas samples collected at 10221 Textile Road were below Residential VIAP SLs, with the exception of tert-butylbenzene at one location, which was above the Residential VIAP SL, but below the Non-residential VIAP SL.

Figures documenting the sample locations and laboratory analytical results above Residential Criteria (as identified in the BEA reports) are enclosed.

Known Contamination – Textile Road Site

Cleanup and monitoring at the Textile Road Site was conducted under an AOC overseen by USEPA. The USEPA would be the proper location to obtain detailed records regarding that cleanup. Notices of Migration of Contamination were submitted to EGLE as a result of this monitoring in August 2001 and September 2003 documenting the presence of vinyl chloride in groundwater above Michigan Department of Environmental Quality (currently known as EGLE) Residential Drinking Water Criteria in a monitoring well location 25 feet from the property boundary. The maximum concentration from the 2001 submittal was 13 micrograms per liter (i.e., parts per billion) in monitoring well MW-4U-00. The data from the 2003 submittal is illegible.

The cover letter from the 2001 submittal, provided by Contestoga-Rovers & Associates, indicated that a groundwater monitoring program was implemented to evaluate the effectiveness of the Removal Action under the AOC, which received approval by the USEPA on May 2, 2001. The results of the groundwater monitoring represented the first round of sampling completed under the monitoring program. Further, the letter indicated

that groundwater use surveys had identified no users of the upper water bearing zone between the property and Ford Lake, citing the presence of a clay aquitard with a thickness of 14 to 18 feet between the upper water bearing zone and underlying sand aquifer. No additional data or information from these sampling events was provided, with the exception of a figure showing monitoring well locations in the 2003 submittal (enclosed).

2. What soil and groundwater monitoring requirements currently apply to this site, including any requirements established through CERCLA, state remediation programs, or other applicable authorities?

The Center and Textile Road Site are regulated by EGLE's Remediation and Redevelopment Division (RRD), under Part 201, Environmental Remediation, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. EGLE does not currently have soil or groundwater monitoring requirements for either site under Part 201. Part 201 is self-implementing and requires the nature and extent of contamination to be defined. The lack of mandatory reporting is a gap in Michigan law that needs to be addressed by the Michigan Legislature. The RPs for the Textile Road Site agreed to a monitoring plan with the USEPA, which was established in the AOC. The USEPA should be able to clarify if groundwater monitoring requirements are complete or if there are continued requirements in accordance with the AOC.

3. Who is responsible for conducting the required monitoring, and who is responsible for overseeing compliance?

As described above, EGLE does not currently have monitoring requirements in Michigan law applicable to the Center or Textile Road Site under Part 201. Although EGLE oversees compliance on sites regulated by Part 201, there are not mandatory reporting requirements for liable parties implementing remedial actions or monitoring activities. The risk category of the Center property located at 10635 Textile Road and the Textile Road Site are Risk Controlled – Interim, meaning that risks are controlled based on the current use. The risk category of the Center property located at 10221 Textile Road is Risks Present and Require Action in the Long-Term.

4. How frequently are soil and groundwater samples collected, and what contaminants are included in the required testing?

Based on file information for the Center properties, sample collection was completed to establish existing site conditions at the time of purchase by the Regents of the University

of Michigan, and no subsequent sampling has been completed. Although the Textile Road Site AOC requires installation of monitoring wells and groundwater monitoring when cleanup efforts were completed, the number of monitoring points, media to be sampled, and analytical suite were to be proposed in a separate Work Plan document. A copy of the final Work Plan document is not contained within EGLE's files, as the cleanup and subsequent monitoring was led by the USEPA.

5. Where are this site's monitoring wells located, and can EPA and EGLE provide a map identifying their locations relative to this site?

Figures provided with the BEA reports for the Center properties are enclosed. These figures include soil and groundwater sampling locations and analytical results above the EGLE Part 201 Residential Criteria, as identified in the BEA reports (note that the BEA reports identify concentrations above background levels as contamination, as discussed above).

Additionally, monitoring well locations for the Textile Road Site provided with the September 2003 Notice of Migration of Contamination submittal are enclosed. It is unknown if this figure depicts the complete monitoring network.

6. What are the most recent soil and groundwater monitoring results, and do those results identify any ongoing contamination, environmental risks, or additional monitoring needs?

The only known analytical results for the Center site were provided in the BEA reports described above. The most recent analytical data provided to EGLE for the Textile Road Site is from the August 2001 and September 2003 Notices of Migration of Contamination as described above.

7. Are there any existing land-use restrictions, institutional controls, environmental covenants, or other restrictions applicable to this property?

Correspondence maintained in the file includes an email discussion of a draft RC for the property, which was provided to Michigan Department of Environmental Quality (MDEQ; currently known as EGLE) for review by USEPA in March 2013. At that time, the MDEQ determined that since USEPA had managed the Site cleanup and subsequent monitoring activities, a review of the draft RC could not be completed by the MDEQ as they were not able to determine the appropriateness of the proposed restrictions. EGLE does not have a record of whether the RC was a finalized and recorded RC.

8. Could anticipated construction activities, including excavation, grading, foundation construction, utility installation, or dewatering, disturb contaminated soil or groundwater, interfere with existing environmental protections, or otherwise create additional environmental risks?

As the current status of the soil and groundwater at the Textile Road Site are unknown, EGLE cannot provide an informed response as to redevelopment activities on the Textile Road Site. A future developer would be required to comply with Due Care as outlined in Section 20107a of Part 201 to ensure safe reuse of the property.

With regard to the Center site, which is a separate property from the Textile Road Site, BEAs were prepared for each property (discussed above). Redevelopment at these properties are also required to comply with Due Care as the submittal of BEAs for the properties indicates they are a facility as defined in Part 201.

9. What environmental reviews, permits, approvals, or other requirements must be completed before construction may begin, including any additional investigation or remediation that may be necessary given the site's environmental history?

EGLE does not issue permits or approvals for redevelopment of a facility as defined under Part 201. However, an owner or operator of a facility is required to be in compliance with Due Care during all phases of ownership (i.e., prior to, during, and after redevelopment of a property). Required permitting associated with any development of the property would be determined by the requirements of the municipality, county, and/or other EGLE divisions (i.e., Water Resources Division, Drinking Water and Environmental Health Division, etc.) for the specific development.

10. What agency has the legal authority to require construction to stop, impose additional protective measures, or otherwise intervene if contamination is discovered, disturbed, or presents an environmental risk during construction?

EGLE does not have the legal authority to stop construction. As described above, redevelopment is required to comply with Due Care under Section 20107a of Part 201. Documentation of Due Care compliance for a facility must be provided by the owner or operator, upon the request of EGLE.

11. Who would be responsible for paying for any additional environmental testing, monitoring, remediation, or environmental response necessitated by this project?

With regard to the Center property, additional environmental monitoring or cleanup would be conducted either by a liable party or managed by the current owner under Due Care as outlined in Section 20107a of Part 201.

Regarding the Textile Road site, the AOC with the USEPA was entered into by the RPs. EGLE has not completed a formal liability review of the Textile Road Site due to the USEPA management of the cleanup and subsequent monitoring under the AOC; however, it is likely that one or all of these RPs would be responsible for any additional environmental testing, monitoring, remediation, or response. Any further inquiry as to the history of the actions taken place at this site, the most current environmental information, and any ongoing monitoring efforts would best be directed to the USEPA.

EGLE is dedicated to protecting human health and the environment consistent with its authority under Michigan's environmental laws. EGLE understands the public's desire to ensure redevelopment of contaminated properties in a manner that protects human health and the environment.

If you have additional questions regarding this matter, please contact Mike Neller, Director, RRD, at 517-512-5859; NellerM@Michigan.gov; or EGLE, P.O. Box 30426, Lansing, Michigan 48909-7926; or you may contact me.

Sincerely,



Phillip D. Roos
Director
517-284-6700

Enclosures

cc/enc: Lee Zeldin, Administrator, USEPA
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Aaron B. Keatley, Chief Deputy Director, EGLE
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