



December 17, 2025

Erin Barnes, Environmental Director, and
La Shell Thomas, Air Environmental Specialist
Peoria Tribe of Indians of Oklahoma
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Heather Webb, Environmental Programs Director
Miami Tribe of Oklahoma
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By email: hwebb@miamination.com

Subject: The November 2025 Request for Benzene Sampling at Miami Head Start and Nichols
Elementary School, Miami, OK
Former B.F. Goodrich Facility / Michelin-BFG Site, Facility ID 355. CO. No. 97-324

Dear Ms. Barnes, Ms. Thomas, and Ms. Webb,

Thank you for the letter from Chief Dobbs to DEQ, received on November 7, 2025, and for your concern for the school and the children and community members nearby. DEQ has strong evidence from 2000 through 2009 that benzene from the former BF Goodrich Plant was never present in the groundwater near the adjacent Miami Head Start or Nichols Elementary School. DEQ suggests, before proposing any off-site sampling, first determining whether benzene or other volatile organic compounds from the site could have reached the eastern facility boundary since 2009 via groundwater movement or ambient air movement.

Data from three wells located on the eastern boundary of the facility is shown in the attached table labeled "Historical BTEX and Chlorobenzene Analytical Results." These wells were nearest to the present-day Miami Head Start and Nichols Elementary School and are shown in Figure 1 as Monitoring Wells MW-27, MW-28, and MW-29. Figure 1 and the table show that benzene, toluene, ethylbenzene, xylenes (BTEX), and chlorobenzene were consistently below the laboratory detection limit in these wells from 2000 until 2009, when DEQ allowed Michelin to drop these from the monitoring network based on the results. In 2015, DEQ approved Michelin's request to plug and abandon those three wells. Figure 1 also shows the known extent of any benzene detections in groundwater in 2009.

As shown in the distribution of dissolved benzene in 2009 (Figure 1) and in 2025 (Figure 3), benzene is not present in the groundwater outside of the areas identified in those figures. Figure 2

shows the water level elevations in 2009.¹ The groundwater containing dissolved benzene was demonstrated to flow to the south-southwest, not towards Miami Head Start or Nichols Elementary School, and the plume was defined. The data showed that the groundwater containing benzene was moving away from the nearby Head Start and the Nichols Elementary School.

In 2019, two wells closer to the leading edge of the plume and used to define the northeast limit of the benzene plume (MW-42 and MW-43) were lost during an EPA removal action. Those two wells were last sampled in 2018 (Water level Elevations in Figure 4 and Benzene Plume in Groundwater in Figure 5), and the 2018 results remained consistent with the 2009 findings. DEQ considers it beneficial to replace the plugged wells (MW-27, MW-28, and MW-29) and provide assurance the plume is still not migrating to the northeast or east. Therefore, DEQ is asking Michelin to propose locations on-site for sentinel wells and a gauging and monitoring schedule for this purpose. DEQ will provide you updates on the well installation, well sampling, and results that follow.

DEQ Air Quality Division is examining the ambient air dispersion pathway for exposure to treated air released from the groundwater remediation system, and DEQ will provide the results to you separately.

DEQ has included Tabitha Langston, Deputy Environmental Director of the Ottawa Tribe of Oklahoma, and Miami Public School District Superintendent Jillian Douthit in this correspondence, as they have submitted similar requests.

If you have questions or comments, or would like to schedule a meeting, please contact Paul Davis by phone at 405-702-5132 or by email at j.paul.davis@deq.ok.gov.

Sincerely,



Jon Reid
Environmental Programs Manager
Land Protection Division

- c. Chief Rosanna Dobbs, Peoria Tribe, email: rdobbs@peoriatribes.com
Ms. Tabitha Langston, Deputy Environmental Director, Ottawa Tribe, email: Tabitha.oto@gmail.com
Ms. Jillian Douthit, Superintendent, Miami Public School District, email: jdouthit@miamips.net
Ms. Lee Warden, Permitting and Engineering Group Manager, DEQ-AQD, email lee.warden@deq.ok.gov

¹ Groundwater flow is expected to be from high to low water level elevations, generally perpendicular to the groundwater elevation contours.



Figure 1: Benzene in Groundwater Samples collected in February 2009 Semiannual Event²
The red line represents the known extent of any benzene detections in groundwater in the 2009 sampling event.

² From URS, 2009, "Semiannual Groundwater Monitoring Report, First Half 2009, Area 2 – Former Ust Area & Area 7 – Southwest Side of Plant & Residential Area" – For a digital copy, contact DEQ Central Records (CentralRecords@DEQ.OK.gov) as "Document Handle 4878696"



Figure 2: Water Level Elevations during February 2009 sampling event

Groundwater Flow (2018)

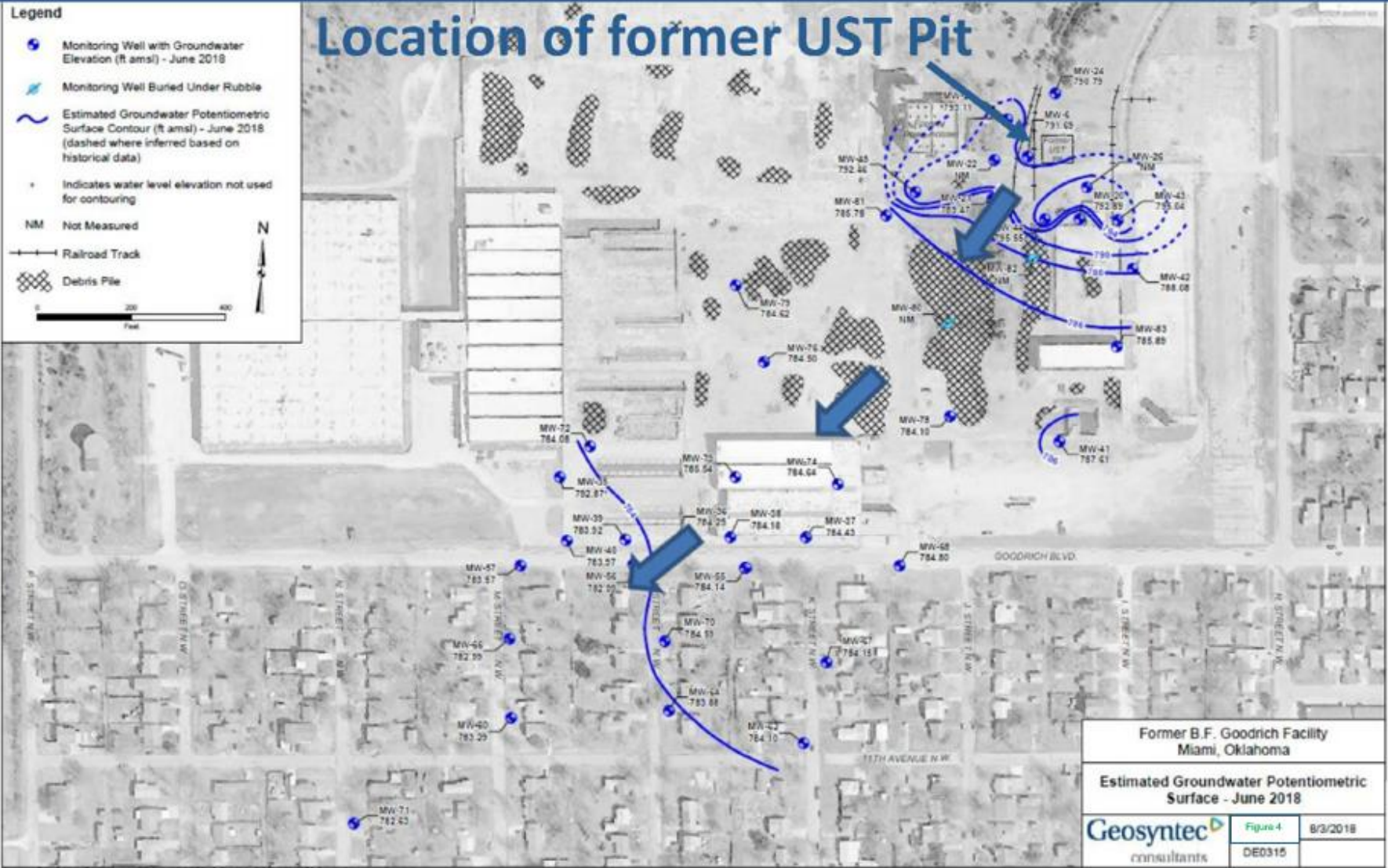


Figure 4: Water Level Elevations from June 2018 sampling event, reinterpreted by Geosyntec and presented at the October 14, 2025, Public Meeting.

Note: presence of MW-42, MW-43 and other wells lost in 2019, and absence of MW-27, MW-28, and MW-29, plugged in 2016.

Benzene Plume (2018)

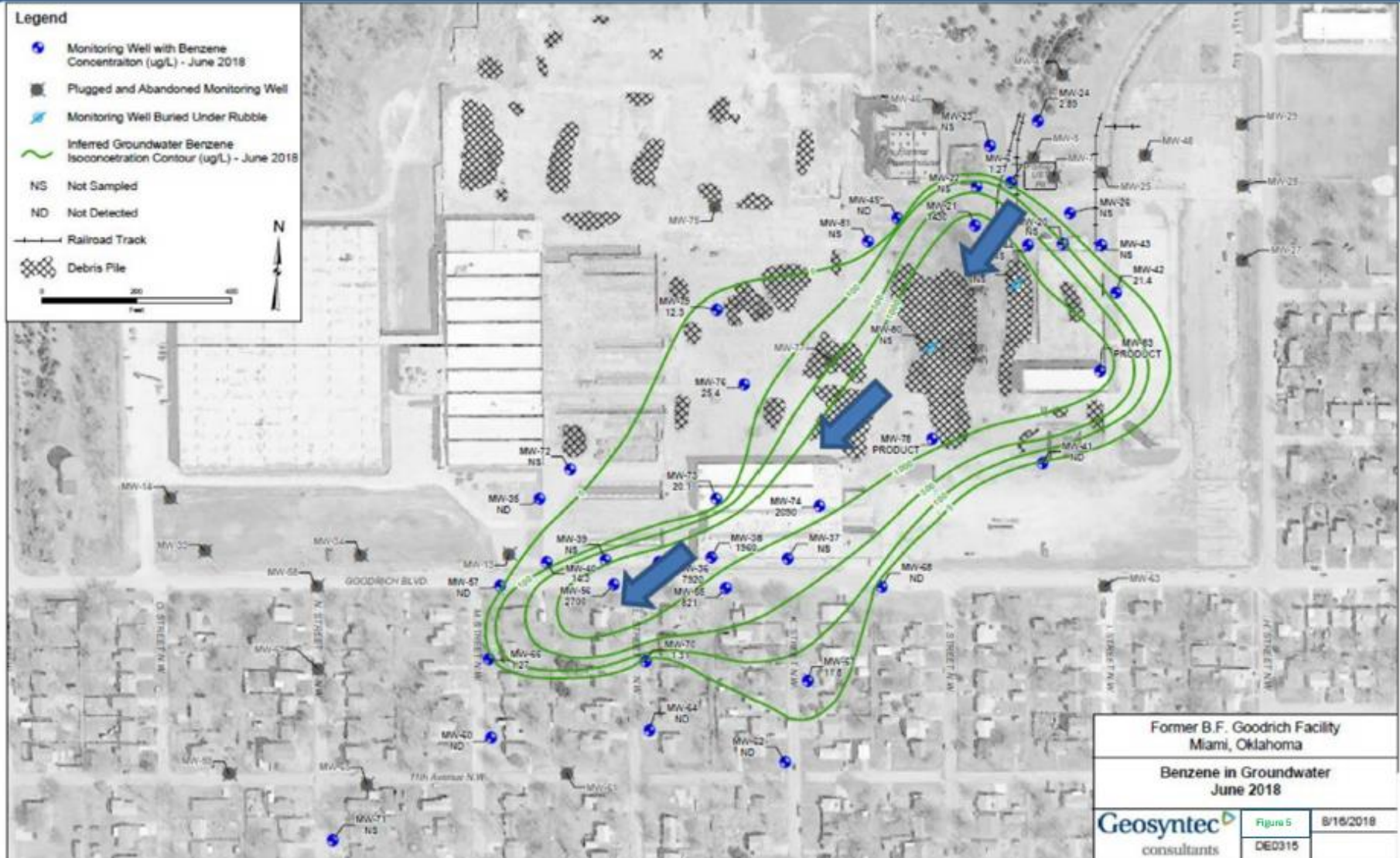


Figure 5: Benzene Plume from June 2018 sampling event, reinterpreted by Geosyntec and presented at the October 14, 2025, Public Meeting.

Note: presence of MW-42, MW-43 and other wells lost in 2019.

Historical BTEX and Chlorobenzene Analytical Results

Former B.F. Goodrich Facility

Well ID	Date	Duplicate Sample	Benzene	Ethylbenzene	Toluene	Xylenes	Chlorobenzene
			(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)
MW-27	10/10/2000		ND	ND	ND	--	ND
MW-27	1/10/2003		ND	ND	ND	--	ND
MW-27	6/3/2003		ND	ND	ND	--	ND
MW-27	1/20/2004		ND	ND	ND	--	ND
MW-27	7/30/2004		ND	ND	ND	--	ND
MW-27	2/1/2005		ND	ND	ND	--	ND
MW-27	7/22/2005		ND	ND	ND	--	ND
MW-27	2/16/2006		ND	ND	ND	--	ND
MW-27	7/12/2006		ND	ND	ND	--	ND
MW-27	2/2/2007		ND	ND	ND	--	ND
MW-27	7/13/2007		ND	ND	ND	--	ND
MW-27	2/14/2008		ND	ND	ND	--	ND
MW-27	7/16/2008		ND	ND	ND	--	ND
MW-27	2/10/2009		ND	ND	ND	--	ND
MW-28	10/10/2000		ND	ND	ND	--	ND
MW-29	10/10/2000		ND	ND	ND	--	ND
MW-29	1/10/2003		ND	ND	ND	--	ND
MW-29	6/3/2003		ND	ND	ND	--	ND
MW-29	1/20/2004		ND	ND	ND	--	ND
MW-29	7/30/2004		ND	ND	ND	--	ND
MW-29	2/1/2005		ND	ND	ND	--	ND
MW-29	7/22/2005		ND	ND	ND	--	ND
MW-29	2/16/2006		ND	ND	ND	--	ND
MW-29	7/12/2006		ND	ND	ND	--	ND
MW-29	2/2/2007		ND	ND	ND	--	ND
MW-29	7/13/2007		ND	ND	ND	--	ND
MW-29	2/14/2008		ND	ND	ND	--	ND
MW-29	7/16/2008		ND	ND	ND	--	ND
MW-29	2/12/2009		ND	ND	ND	--	ND

ND: Not Detected