

# Memo

**SUBJECT**

RACER Pontiac North Campus  
RW-08-14 LNAPL System Decommission

**TO**

Peter Ramanauskas, USEPA  
US Environmental Protection Agency,  
Region 5  
77 West Jackson Blvd LU-9J  
Chicago, Illinois 60604-3590

**DATE**

April 12, 2023

**PROJECT NUMBER**

30167840

**COPIES TO**

Dave Favero, RACER  
Arcadis File

**NAME**

Tiffany Linder, Arcadis  
[Tiffany.Linder@arcadis.com](mailto:Tiffany.Linder@arcadis.com)

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This memorandum summarizes the light non-aqueous phase liquid (LNAPL) system decommission activities conducted at the Revitalizing Auto Communities Environmental Response Trust (RACER) Pontiac North Campus Site (Site) located in Pontiac, Michigan (**Figure 1 and Figure 2**). The system's decommission scope of work was performed in accordance with the United States Environmental Protection Agency's (USEPA's) July 25, 2022 email approval (**Attachment 1**) of the *RACER Pontiac North Campus - RW-08-14 Shutdown Request*, drafted by Arcadis and submitted to USEPA on July 21, 2022.

System decommission activities were conducted on October 26, 2022 by HM Environmental, Inc. under Arcadis' oversight. Prior to decommission, power to the LNAPL shed was shut off and locked out by a certified electrician. The following equipment was removed and disposed of: AC Sipper device at LNAPL well, discharge hose, fluid transfer pump and nozzle, two totes and metal cages, tankful probe, PVC manifold fittings and piping, and the secondary containment. One 55-gallon stainless-steel drum was used to collect any residual LNAPL left in the system components. Waste materials were cut down to pieces less than 3 feet by 3 feet and placed in a lined roll off box container. On October 31, US Ecology Transportation Solutions, Inc. transported the roll off box as TSCA waste debris offsite for disposal at US Ecology Wayne Disposal, Inc. Site #2 Landfill in Belleville, Michigan. The residual LNAPL drum was originally transported offsite on December 9, with another LNAPL drum, as TSCA waste. Due to re-profiling the LNAPL waste, a new waste manifest was generated and the two LNAPL drums were sent for incineration disposal at Veolia Environmental Services Port Arthur in Beaumont, Texas on January 9, 2023. System decommissioning photos are included as **Attachment 2** and the Waste Disposal Manifest and the Certificate of Destruction is included in **Attachment 3**.

The shed containing the former LNAPL system remains onsite and will continue to house tools, equipment and materials for future onsite activities. Recovery Well RW-08-14 also remains within the shed to be used for potential LNAPL gauging, if needed.

Mr. Peter Ramanauskas  
April 12, 2023

Enc.

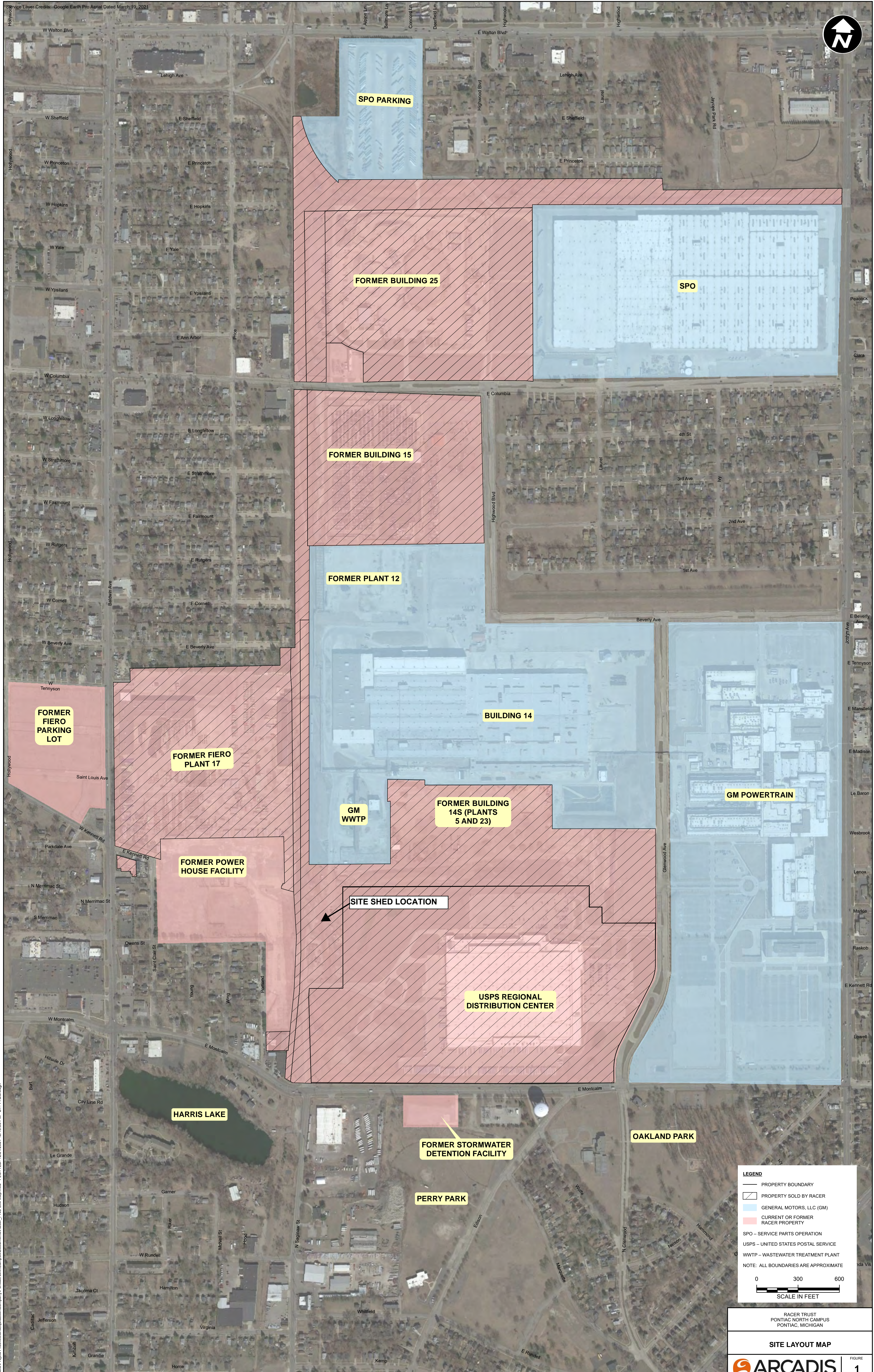
Figure 1 Site Layout Map

Figure 2 LNAPL Shed Location

Attachment 1 USEPA Email Approval of System Decommission

Attachment 2 System Decommissioning Photograph Log

Attachment 3 Waste Disposal Manifests and Certificate of Destruction



CITY: NOV MI, DIV: ENV, DB: TRV, PIC: PM, B. SANDERS, TM: TR, PROJECT NUMBER: 30006882  
COORDINATE SYSTEM: NAD 1983 StatePlane Michigan South FIPS 2113 Feet  
CADD: Project Files\Arcadis\30006882\30006882.dwg, PLOT: 12/21/2021 12:19:58 PM, BY: T. Brough

**LEGEND**

- PROPERTY BOUNDARY
- ▨ PROPERTY SOLD BY RACER
- GENERAL MOTORS, LLC (GM)
- CURRENT OR FORMER RACER PROPERTY
- SPO – SERVICE PARTS OPERATION
- USPS – UNITED STATES POSTAL SERVICE
- WWTP – WASTEWATER TREATMENT PLANT
- NOTE: ALL BOUNDARIES ARE APPROXIMATE

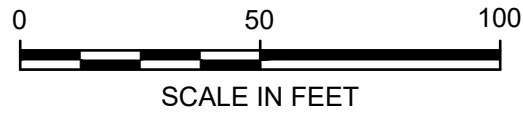
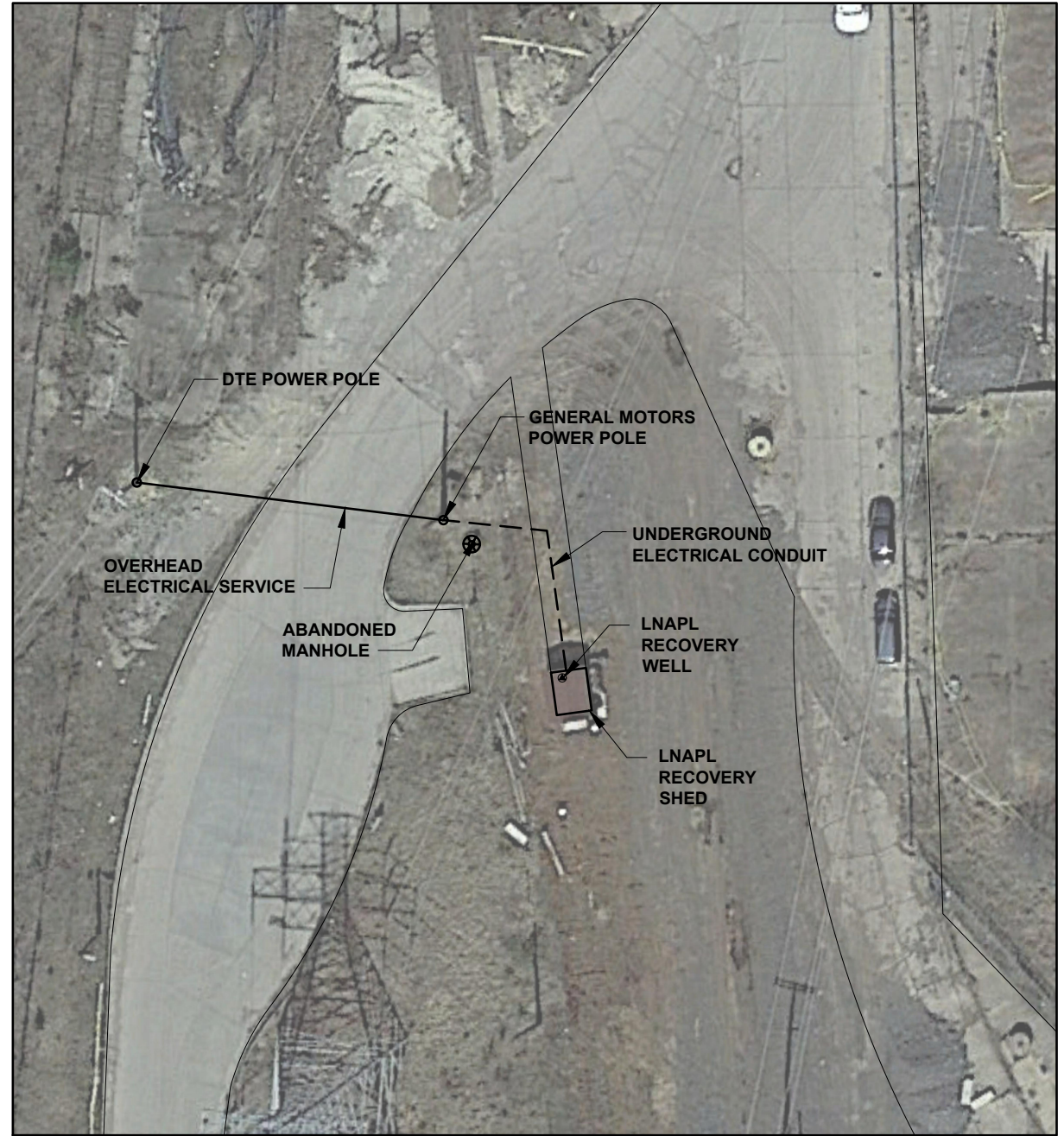
0 300 600  
SCALE IN FEET

RACER TRUST  
PONTIAC NORTH CAMPUS  
PONTIAC, MICHIGAN

**SITE LAYOUT MAP**

**ARCADIS** | FIGURE 1

CITY: DIV/GRUP: DB: LD: PIC: PM: TM: LVR:ON:OFF=REF-  
 D:\GIS\Project Files\MotorsLiquidationCompany\PontiacNorthCampus\CAD\_Data\StormDesign\PNC\_01\_SiteLayout.dwg LAYOUT: LNAPL\_SHED\_LOCATION  
 YARBROUGH, TOBI



THIS BAR REPRESENTS ONE INCH ON THE ORIGINAL DRAWING.

USE TO VERIFY FIGURE REPRODUCTION SCALE

| No. | Date     | Revisions  | By  | Ckd |
|-----|----------|--|-----|-----|
| 1   | 7/5/2018 | General revisions to all sheets. Removed Sheet M-5 | TRY | MW  |

THIS DRAWING IS THE PROPERTY OF THE ARCADIS ENTITY IDENTIFIED IN THE TITLE BLOCK AND MAY NOT BE REUSED OR ALTERED IN WHOLE OR IN PART WITHOUT THE EXPRESS WRITTEN PERMISSION OF SAME.

Project Mgr.  
BS  
 Designed by  
DMS  
 Drawn by  
TRY  
 Checked by  
MRW



RACER TRUST  
 PONTIAC NORTH CAMPUS

## LNAPL SHED LOCATION

GENERAL

ARCADIS Project No.  
30042811.00005

Date  
APRIL 2020

ARCADIS  
 ARCADIS OF MICHIGAN, LLC.  
 300 S. WASHINGTON  
 SQUARE, STE 315  
 LANSING, MICHIGAN 48933

# **Attachment 1**

**USEPA Email Approval of System Decommissioning**

## Linder, Tiffany

---

**From:** Ramanauskas, Peter <ramanauskas.peter@epa.gov>  
**Sent:** Monday, July 25, 2022 10:53 AM  
**To:** Linder, Tiffany  
**Cc:** Dave Favero; Curry, Patrick  
**Subject:** RE: RACER PNC - LNAPL Transmissivity Test Summary and RW-08-14 System Abandonment Request\_Final

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Hello Tiffany,

Thanks for the revised submittal. Based on the information provided in the memo, EPA has no objections to the recommended dismantlement of the LNAPL recovery system at RW-08-14.

Regards,

Peter Ramanauskas  
RCRA Corrective Action Project Manager  
Regional PCB Coordinator  
USEPA Region 5  
77 W. Jackson Boulevard (LR-16J)  
Chicago, IL 60604  
(312) 886-7890

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**From:** Linder, Tiffany <Tiffany.Linder@arcadis.com>  
**Sent:** Thursday, July 21, 2022 4:25 PM  
**To:** Ramanauskas, Peter <ramanauskas.peter@epa.gov>  
**Cc:** dfavero@racertrust.org; Curry, Patrick <Patrick.Curry@arcadis.com>  
**Subject:** RACER PNC - LNAPL Transmissivity Test Summary and RW-08-14 System Abandonment Request\_Final

Hello Peter,

Please find attached the Final revised Memo summarizing the last LNAPL transmissivity testing at RW-08-14 and request for the LNAPL system abandonment at RW-08-14. The main purpose of this memo was to communicate the transmissivity testing results and request the abandonment of the RW-08-14 system, so we thought it was best to remove the USPS LNAPL well abandonment request from this memo to not confuse things. The USPS LNAPL monitoring well abandonment request will be addressed under a separate memorandum in the future. Any further questions please let us know, thank you!

**Tiffany A. Linder**  
Certified Project Manager  
Arcadis of Michigan, LLC  
28550 Cabot Drive, Suite 500 | Novi, MI | 48377 | USA  
T +1 810 225 1928  
M +1 517 861 0138  
[www.arcadis.com](http://www.arcadis.com)

Uniting our **Global**  
**Health and Safety Focus**  
Global Health & Safety Day 2022



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of Arcadis are neither given nor endorsed by it.

# **Attachment 2**

**System Decommissioning Photograph Log**

# Photograph Log

RACER Trust  
RACER Pontiac North Campus  
30112891



**Photograph: 1**

**Description:**  
LNAPL Shed before  
decommission

**Location:**  
Pontiac, MI

**Photograph taken by:**  
K. Hunt

**Date:** 10/26/2022



**Photograph: 2**

**Description:**  
LNAPL Shed before  
AC Geotech Sipper

**Location:**  
Pontiac, MI

**Photograph taken by:**  
K. Hunt

**Date:** 10/26/2022

# Photograph Log

RACER Trust  
RACER Pontiac North Campus  
30112891



**Photograph: 3**

**Description:**  
LNAPL Shed before  
Transfer Pump, Nozzle

**Location:**  
Pontiac, MI

**Photograph taken by:**  
K. Hunt

**Date:** 10/26/2022



**Photograph: 4**

**Description:**  
LNAPL Shed before  
Totes, Secondary  
Containment

**Location:**  
Pontiac, MI

**Photograph taken by:**  
K. Hunt

**Date:** 10/26/2022

# Photograph Log

RACER Trust  
RACER Pontiac North Campus  
30112891



**Photograph: 5**

**Description:**  
LNAPL Shed after

**Location:**  
Pontiac, MI

**Photograph taken by:**  
K. Hunt

**Date:** 10/26/2022



**Photograph: 6**

**Description:**  
LNAPL Shed after

**Location:**  
Pontiac, MI

**Photograph taken by:**  
K. Hunt

**Date:** 10/26/2022

# **Attachment 3**

**Waste Disposal Manifests and Certificate of Destruction**

| <b>UNIFORM HAZARDOUS WASTE MANIFEST</b>  |  | 1. Generator ID Number<br>MID 005 356 886 | 2. Page 1 of<br>1 | 3. Emergency Response Phone<br>(800) 839-3975   | 4. Manifest Tracking Number<br><b>024068081 JJK</b> |                 |           |            |
|--|--|---|-------------------|---|---|-----------------|-----------|------------|
| 5. Generator's Name and Mailing Address<br>RACER TRUST<br>28550 CABOT DRIVE<br>NOVI, MI 48377<br>Generator's Phone: (517) 974-4441   |  |   |                   | Generator's Site Address (if different than mailing address)<br>220 E. COLUMBIA AVE<br>MC: 483-074-211<br>PONTIAC, MI 48340 |   |                 |           |            |
| 6. Transporter 1 Company Name<br>US Ecology Transportation Solutions, Inc  |  |   |                   | U.S. EPA ID Number<br>MIK 593 743 838   |   |                 |           |            |
| 7. Transporter 2 Company Name  |  |   |                   | U.S. EPA ID Number  |   |                 |           |            |
| 8. Designated Facility Name and Site Address<br>WAYNE DISPOSAL, INC. SITE #2 LANDFILL<br>49350 N I-94 SERVICE DRIVE<br>BELLEVILLE, MI 48111<br>Facility's Phone: (800) 592-5489  |  |   |                   | U.S. EPA ID Number<br>MID 048 090 633   |   |                 |           |            |
| 9a. HM   | 9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any)) | 10. Containers                            |                   | 11. Total Quantity  | 12. Unit Wt./Vol.                                   | 13. Waste Codes |           |            |
|  |  | No.                                       | Type              |   |   |                 |           |            |
| X  | UN3432, Polychlorinated biphenyls, solid, 9, PGII, ERG #171  | 001                                       | CM                |   | 1   | PCB1            |           |            |
| 2.   |  |   |                   |   |   |                 |           |            |
| 3.   |  |   |                   |   |   |                 |           |            |
| 4.   |  |   |                   |   |   |                 |           |            |
| 14. Special Handling Instructions and Additional Information<br>J22883WJDI / PCB CONTAMINATED DEBRIS [W:14.00.24486501]  |  |   |                   |   |   |                 |           |            |
| 15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.<br>I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true. |  |   |                   |   |   |                 |           |            |
| Generator's/Offoror's Printed/Typed Name<br>Kathryn Hunt on behalf of RACER Trust  |  |   |                   | Signature<br><i>Kathryn Hunt</i>  |   | Month<br>11     | Day<br>31 | Year<br>22 |
| 16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____<br>Transporter signature (for exports only): _____ Date leaving U.S.: _____  |  |   |                   |   |   |                 |           |            |
| 17. Transporter Acknowledgment of Receipt of Materials   |  |   |                   |   |   |                 |           |            |
| Transporter 1 Printed/Typed Name   |  |   |                   | Signature   |   | Month           | Day       | Year       |
| David DUNNIBAN   |  |   |                   | <i>David Dunniban</i>   |   |                 |           |            |
| Transporter 2 Printed/Typed Name   |  |   |                   | Signature   |   | Month           | Day       | Year       |
|  |  |   |                   |   |   | 10              | 31        | 22         |
| 18. Discrepancy  |  |   |                   |   |   |                 |           |            |
| 18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection  |  |   |                   |   |   |                 |           |            |
| Manifest Reference Number: _____   |  |   |                   |   |   |                 |           |            |
| 18b. Alternate Facility (or Generator)   |  |   |                   | U.S. EPA ID Number  |   |                 |           |            |
| Facility's Phone: _____  |  |   |                   |   |   |                 |           |            |
| 18c. Signature of Alternate Facility (or Generator)  |  |   |                   |   |   | Month           | Day       | Year       |
|  |  |   |                   |   |   |                 |           |            |
| 19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)  |  |   |                   |   |   |                 |           |            |
| 1.   | 2.   | 3.  | 4.                |   |   |                 |           |            |
| H132   |  |   |                   |   |   |                 |           |            |
| 20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a   |  |   |                   |   |   |                 |           |            |
| Printed/Typed Name   |  |   |                   | Signature   |   | Month           | Day       | Year       |
|  |  |   |                   |   |   |                 |           |            |

TR 107 49,760

Please print or type.

Form Approved. OMB No. 2050-0039

|  |        |  |                            |   |  |               |                 |  |
|--|--------|--|----------------------------|---|--|---------------|-----------------|--|
| UNIFORM HAZARDOUS WASTE MANIFEST   |        | 1. Generator ID Number<br>MID 005 356 886  | 2. Page 1 of 1             | 3. Emergency Response Phone<br>(800) 839-3975 | 4. Manifest Tracking Number<br>024068081 JJK |               |                 |  |
| 5. Generator's Name and Mailing Address<br>RACER TRUST<br>28550 CABOT DRIVE<br>NOV, MI 48377<br>Generator's Phone: (517) 974-4441  |        | Generator's Site Address (if different than mailing address)<br>220 E. COLUMBIA AVE<br>MC 483-014-211<br>PONTIAC, MI 48340 |                            |   |  |               |                 |  |
| 6. Transporter 1 Company Name<br>US Ecology Transportation Solutions, Inc  |        | U.S. EPA ID Number<br>MIK 593 743 838  |                            |   |  |               |                 |  |
| 7. Transporter 2 Company Name  |        | U.S. EPA ID Number   |                            |   |  |               |                 |  |
| 8. Designated Facility Name and Site Address<br>WAYNE DISPOSAL, INC. SITE #2 LANDFILL<br>49350 N I-94 SERVICE DRIVE<br>BELLEVILLE, MI 48111<br>Facility's Phone: (800) 592-5489  |        | U.S. EPA ID Number<br>MID 048 090 633  |                            |   |  |               |                 |  |
| GENERATOR  | 9a. HM | 9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))             | 10. Containers<br>No. Type |   | 11. Total Quantity                           | 12. Unit W/HL | 13. Waste Codes |  |
|  | X      | UN3492, Polychlorinated biphenyls, solid, 9, PGII, ERG #171  | 001                        | CM  | 670  | K             | PCB1            |  |
|  | 2      |  |                            |   |  |               |                 |  |
|  | 3      |  |                            |   |  |               |                 |  |
|  | 4      |  |                            |   |  |               |                 |  |
| 14. Special Handling Instructions and Additional Information<br>J228039WD / PCB CONTAMINATED DEBRIS (W:14.00.24486501)<br>Storage start date 10/26/22  |        |  |                            |   |  |               |                 |  |
| 15. GENERATOR/SUFFERER'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (I) as a large quantity generator) or (b) (I) as a small quantity generator) is true. |        |  |                            |   |  |               |                 |  |
| Generator's Officer's Printed/Typed Name<br>K. J. ...  |        | Signature<br><i>[Signature]</i>  |                            |   | Month Day Year<br>10 31 22                   |               |                 |  |
| 16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry: Date leaving U.S.:  |        |  |                            |   |  |               |                 |  |
| 17. Transporter Acknowledgment of Receipt of Materials   |        |  |                            |   |  |               |                 |  |
| Transporter 1 Printed/Typed Name<br>David DUNNIBAN   |        | Signature<br><i>[Signature]</i>  |                            |   | Month Day Year<br>10 31 22                   |               |                 |  |
| Transporter 2 Printed/Typed Name   |        | Signature  |                            |   | Month Day Year                               |               |                 |  |
| 18. Discrepancy  |        |  |                            |   |  |               |                 |  |
| 18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input checked="" type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection<br>to correct qty and PCBs per Chris Schmitt w/ USTI / Manifest 10-31-22  |        |  |                            |   |  |               |                 |  |
| 18b. Alternate Facility (or Generator) U.S. EPA ID Number  |        |  |                            |   |  |               |                 |  |
| 18c. Signature of Alternate Facility (or Generator) Month Day Year   |        |  |                            |   |  |               |                 |  |
| 19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)  |        |  |                            |   |  |               |                 |  |
| 1. H132  |        | 2.   |                            | 3.  |  | 4.            |                 |  |
| 20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in item 18a   |        |  |                            |   |  |               |                 |  |
| Printed/Typed Name<br>Antonio LeGyon   |        | Signature<br><i>[Signature]</i>  |                            |   | Month Day Year<br>10 31 22                   |               |                 |  |

| <b>UNIFORM HAZARDOUS WASTE MANIFEST</b>   |  | 1. Generator ID Number<br>MID005356886 | 2. Page 1 of<br>1  | 3. Emergency Response Phone<br>810-922-9012  | 4. Manifest Tracking Number<br><b>017295216 FLE</b> |                                   |
|---|--|--|--|--|---|-----------------------------------|
| 5. Generator's Name and Mailing Address: <i>Attn: Deb Newcom</i><br>Racer Trust - Pontiac North<br>28550 Cabot Dr Ste 500<br>Novi, MI 48377<br>Generator's Phone: 810-922-9012  |  |  | Generator's Site Address (if different than mailing address)<br>Racer Pontiac North<br>220 E Columbia Ave<br>Pontiac, MI 48340 |  |   |                                   |
| 6. Transporter 1 Company Name<br>U.S. Industrial Technologies, Inc.   |  |  |  | U.S. EPA ID Number<br>MIR000022772   |   |                                   |
| 7. Transporter 2 Company Name<br><i>US Ecology Transportation Solutions</i>   |  |  |  | U.S. EPA ID Number<br><i>MIR 593743838</i>   |   |                                   |
| 8. Designated Facility Name and Site Address<br>Wayne Disposal Inc. Site 2 Landfill<br>49350 N. I-94 Service Drive<br>Belleville, MI 48111<br>800-592-5489<br>Facility's Phone:   |  |  |  | U.S. EPA ID Number<br>MID048090633   |   |                                   |
| 9a. HM  | 9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any)) | 10. Containers                         |  | 11. Total Quantity   | 12. Unit Wt./Vol.                                   | 13. Waste Codes                   |
|   |  | No.                                    | Type   |  |   |                                   |
| X   | 1RQ, UN3432, Polychlorinated biphenyls, solid, 9, PGII, RQ(PCB) ERG#171  | 02                                     | DM   | 100  | K   | PCB6                              |
| 2.  |  |  |  |  |   |                                   |
| 3.  |  |  |  |  |   |                                   |
| 4.  |  |  |  |  |   |                                   |
| 14. Special Handling Instructions and Additional Information<br>1.) J228039WDI PCB Contaminated Debris - LNAPL System Decomm<br>OSD: <i>12-9-22</i><br>Unique #: <i>120922-01, 120922-02</i>  |  |  |  | Contract retained by generator confers agency authority on initial transporter to add or substitute additional transporters on generator's behalf. |   |                                   |
| 15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true. |  |  |  |  |   |                                   |
| Generator's/Offeror's Printed/Typed Name<br><i>Kathryn Hunt on behalf of RACER TRUST</i>  |  |  |  | Signature<br><i>[Signature]</i>  |   | Month Day Year<br><i>12 09 22</i> |
| 16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____  |  |  |  |  |   |                                   |
| 17. Transporter Acknowledgment of Receipt of Materials  |  |  |  |  |   |                                   |
| Transporter 1 Printed/Typed Name<br><i>JOSHUA A. WIEGAND</i>  |  |  |  | Signature<br><i>[Signature]</i>  |   | Month Day Year<br><i>12 09 22</i> |
| Transporter 2 Printed/Typed Name<br><i>Robert Poach</i>   |  |  |  | Signature<br><i>[Signature]</i>  |   | Month Day Year<br><i>12 16 22</i> |
| 18. Discrepancy   |  |  |  |  |   |                                   |
| 18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input checked="" type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input checked="" type="checkbox"/> Full Rejection   |  |  |  |  |   |                                   |
| <i>Full rejection due to non-conforming waste per Chris Schams w/USDT</i>   |  |  |  |  |   |                                   |
| 18b. Alternate Facility (or Generator)<br>28550 Cabot Dr Site 500<br>Novi, MI 48377 (810) 810-922-9012  |  |  |  | U.S. EPA ID Number<br>MID 005 356886   |   |                                   |
| 18c. Signature of Alternate Facility (or Generator)   |  |  |  |  |   | Month Day Year                    |
| 19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)   |  |  |  |  |   |                                   |
| 1.  | 2.   | 3.                                     | 4.   |  |   |                                   |
|   | H132   |  |  |  |   |                                   |
| 20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a  |  |  |  |  |   |                                   |
| Printed/Typed Name<br><i>Antonio Carlsant</i>   |  |  |  | Signature<br><i>[Signature]</i>  |   | Month Day Year<br><i>12 21 22</i> |

X

Please print or type.

Form Approved. OMB No. 2050-0039

|   |  |                          |  |   |
|---|--|--------------------------|--|---|
| <b>UNIFORM HAZARDOUS WASTE MANIFEST</b> | 1. Generator ID Number<br><b>MED 005 356 886</b> | 2. Page 1 of<br><b>1</b> | 3. Emergency Response Phone<br><b>810-922-9012</b> | 4. Manifest Tracking Number<br><b>017302722 FLE</b> |
|---|--|--------------------------|--|---|

|   |  |
|---|--|
| 5. Generator's Name and Mailing Address<br><b>RACE INST - RICHIE WTH<br/>28550 Cabot Dr. Suite 500 Norwalk CT 06857</b> | Generator's Site Address (if different than mailing address)<br><b>RACE INST WTH<br/>210 E. Columbia Ave<br/>Norwalk, CT 06850</b> |
| Generator's Phone: <b>810-922-9012</b>  |  |

|  |  |
|--|--|
| 6. Transporter 1 Company Name<br><b>W Industrial Technologies Inc.</b> | U.S. EPA ID Number<br><b>MTX 000 022 772</b> |
| 7. Transporter 2 Company Name  | U.S. EPA ID Number                           |

|  |  |
|--|--|
| 8. Designated Facility Name and Site Address<br><b>Uco's Environmental Services Port Arthur<br/>7665 Hwy 73<br/>Beaumont, TX 77705</b> | U.S. EPA ID Number<br><b>TXD 000 838 896</b> |
| Facility's Phone: <b>409-736-2821</b>  |  |

| 9a. HM   | 9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any)) | 10. Containers |           | 11. Total Quantity | 12. Unit WL/Vol. | 13. Waste Codes |  |  |
|----------|--|----------------|-----------|--------------------|------------------|-----------------|--|--|
|          |  | No.            | Type      |                    |                  |                 |  |  |
| <b>X</b> | <b>1. RQ, UN 2315, Polychlorinated Biphenyls, Liquid, ?<br/>PG II RQ (P02)</b>                                 | <b>02</b>      | <b>DM</b> | <b>100</b>         | <b>K</b>         | <b>none</b>     |  |  |
|          | 2.   |                |           |                    |                  |                 |  |  |
|          | 3.   |                |           |                    |                  |                 |  |  |
|          | 4.   |                |           |                    |                  |                 |  |  |

|   |
|---|
| 14. Special Handling Instructions and Additional Information<br><b>1) CNAPL Waste 1132931 HTAVE1073</b> |
|---|

15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.  
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

|  |                                 |                    |                  |                   |
|--|---------------------------------|--------------------|------------------|-------------------|
| Generator's/Offor's Printed/Typed Name<br><b>Kathryn Hunt on behalf of RACE INST</b> | Signature<br><i>[Signature]</i> | Month<br><b>01</b> | Day<br><b>09</b> | Year<br><b>23</b> |
|--|---------------------------------|--------------------|------------------|-------------------|

|   |  |                     |
|---|--|---------------------|
| 16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. |  | Port of entry/exit: |
| Transporter signature (for exports only):   |  | Date leaving U.S.:  |

|  |                                 |                    |                  |                   |
|--|---------------------------------|--------------------|------------------|-------------------|
| 17. Transporter Acknowledgment of Receipt of Materials |                                 |                    |                  |                   |
| Transporter 1 Printed/Typed Name<br><b>Chris...</b>    | Signature<br><i>[Signature]</i> | Month<br><b>01</b> | Day<br><b>09</b> | Year<br><b>23</b> |
| Transporter 2 Printed/Typed Name                       | Signature                       | Month              | Day              | Year              |

|                                   |                                   |                               |                                  |  |   |
|-----------------------------------|-----------------------------------|-------------------------------|----------------------------------|--|---|
| 18. Discrepancy                   |                                   |                               |                                  |  |   |
| 18a. Discrepancy Indication Space | <input type="checkbox"/> Quantity | <input type="checkbox"/> Type | <input type="checkbox"/> Residue | <input type="checkbox"/> Partial Rejection | <input type="checkbox"/> Full Rejection |
| Manifest Reference Number:        |                                   |                               |                                  |  |   |

|  |                    |
|--|--------------------|
| 18b. Alternate Facility (or Generator) | U.S. EPA ID Number |
| Facility's Phone:                      |                    |

|   |       |     |      |
|---|-------|-----|------|
| 18c. Signature of Alternate Facility (or Generator) | Month | Day | Year |
|---|-------|-----|------|

|   |    |    |    |
|---|----|----|----|
| 19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems) |    |    |    |
| 1.  | 2. | 3. | 4. |

|  |           |       |     |      |
|--|-----------|-------|-----|------|
| 20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a |           |       |     |      |
| Printed/Typed Name   | Signature | Month | Day | Year |



017302722FLE

932675

Form Approved. OMB No. 2050-0039

Please print or type.

|                                  |   |                   |   |  |
|----------------------------------|---|-------------------|---|--|
| UNIFORM HAZARDOUS WASTE MANIFEST | 1. Generator ID Number<br>MED 005 356 886 | 2. Page 1 of<br>1 | 3. Emergency Response Phone<br>810-922-9012 | 4. Manifest Tracking Number<br>017302722 FLE |
|----------------------------------|---|-------------------|---|--|

|   |  |
|---|--|
| 5. Generator's Name and Mailing Address<br>Racer Truck Rental North<br>28550 Cabot Drive Suite 100<br>North Attleboro, MA 01937 | Generator's Site Address (if different than mailing address)<br>Racer Truck Rental North<br>220 E. Columbia Ave<br>North Attleboro, MA 01934 |
| Generator's Phone:<br>810-922-9012  |  |

|  |                                       |
|--|---------------------------------------|
| 6. Transporter 1 Company Name<br>US Industrial Technologies Inc. | U.S. EPA ID Number<br>MEX 000 022 772 |
|--|---------------------------------------|

|  |                                    |
|--|------------------------------------|
| 7. Transporter 2 Company Name<br>Veolia ES Technical Solutions | U.S. EPA ID Number<br>MSD080631369 |
|--|------------------------------------|

|  |                                       |
|--|---------------------------------------|
| 8. Designated Facility Name and Site Address<br>Veolia Environmental Services Port Arthur<br>7665 Hwy 73<br>Beaumont, TX 77705 | U.S. EPA ID Number<br>TXD 000 838 896 |
| Facility's Phone:<br>409-736-2821  |                                       |

| 9a. HM | 9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any)) | 10. Containers |      | 11. Total Quantity | 12. Unit Wt./Vol. | 13. Waste Codes |  |  |
|--------|--|----------------|------|--------------------|-------------------|-----------------|--|--|
|        |  | No.            | Type |                    |                   |                 |  |  |
| X      | 1. RQ LW 2315, Polyesterated Biphenyls Liquid, 9<br>PG II RQ (RQ3)   | 02             | DM   | 100                | K                 |                 |  |  |
|        | 2.   |                |      |                    |                   |                 |  |  |
|        | 3.   |                |      |                    |                   |                 |  |  |
|        | 4.   |                |      |                    |                   |                 |  |  |

14. Special Handling Instructions and Additional Information  
1) CNAPL Waste 1132931 HTAVE1073

15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

|  |                                 |             |           |            |
|--|---------------------------------|-------------|-----------|------------|
| Generator's/Offeree's Printed/Typed Name<br>Kathryn Hunt on behalf of Racer Truck Rental North | Signature<br><i>[Signature]</i> | Month<br>01 | Day<br>09 | Year<br>23 |
|--|---------------------------------|-------------|-----------|------------|

16. International Shipments  Import to U.S.  Export from U.S. Port of entry/exit: \_\_\_\_\_ Date leaving U.S.: \_\_\_\_\_

17. Transporter Acknowledgment of Receipt of Materials

|   |                                 |             |           |            |
|---|---------------------------------|-------------|-----------|------------|
| Transporter 1 Printed/Typed Name<br>Chris [Signature] | Signature<br><i>[Signature]</i> | Month<br>01 | Day<br>09 | Year<br>23 |
| Transporter 2 Printed/Typed Name<br>Jacob Plisko      | Signature<br><i>[Signature]</i> | Month<br>01 | Day<br>12 | Year<br>23 |

18. Discrepancy

18a. Discrepancy Indication Space  Quantity  Type  Residue  Partial Rejection  Full Rejection

Manifest Reference Number: \_\_\_\_\_

18b. Alternate Facility (or Generator) \_\_\_\_\_ U.S. EPA ID Number \_\_\_\_\_

Facility's Phone: \_\_\_\_\_

18c. Signature of Alternate Facility (or Generator) \_\_\_\_\_ Month \_\_\_\_\_ Day \_\_\_\_\_ Year \_\_\_\_\_

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

|         |    |    |    |
|---------|----|----|----|
| 1. H000 | 2. | 3. | 4. |
|---------|----|----|----|

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a

|                                       |                                 |            |           |            |
|---------------------------------------|---------------------------------|------------|-----------|------------|
| Printed/Typed Name<br>Jesse Carpenter | Signature<br><i>[Signature]</i> | Month<br>1 | Day<br>30 | Year<br>23 |
|---------------------------------------|---------------------------------|------------|-----------|------------|

GENERATOR  
TRANSPORTER INTL.  
DESIGNATED FACILITY





Veolia ES Technical Solutions, L.L.C.  
Federal EPA ID: TXD000838896  
State EPA ID: 50212-001  
Highway 73, 3.5 miles W. of Taylor Bayou Bridge  
Port Arthur, TX 77643  
(409) 736-2821

RACER TRUST - PONTIAC NORTH  
200 East Columbia Avenue  
Pontiac, MI 48340

CERTIFICATE OF DESTRUCTION

Veolia ES Technical Solutions, L.L.C. has received waste material from RACER TRUST - PONTIAC NORTH (Fed EPA ID - MID005356886) on 1/30/2023 as described on [State Manifest or Uniform] Hazardous Waste Manifest number 017302722FLE. Veolia ES Technical Solutions, L.L.C. hereby certifies that the above described material was incinerated, and thereby destroyed, in accordance with the 40 CFR, part 761, as it pertains to the incineration of Poly-Chlorinated Biphenyl contaminated materials.

Sequence 1

Profile Number: PTAVES073

Veolia Tracking ID: 932675-01

| <u>Process</u> | <u>Veolia Unit ID</u> | <u>Treatment Date</u> | <u>Generator #</u> | <u>Inter-Company #</u> |
|----------------|-----------------------|-----------------------|--------------------|------------------------|
| INCINERATION   | 1                     | 04/03/2023            | LD4010263000001010 | LD4010263000001010     |
| INCINERATION   | 2                     | 04/03/2023            | LD4010263000001020 | LD4010263000001020     |

Under civil and criminal penalties of law for the making or submission of false or fraudulent statements or representations (18 U.S.C. 1001 and 15 U.S.C. 2615), I certify that the information contained in or accompanying this document is true, accurate, and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the persons who, acting under my direct instructions, made the verification that this information is true, accurate, and complete.

Paul V. Conrad  
Material Services Manager