

Haley & Aldrich of Michigan
3840 Packard Road
Suite 130
Ann Arbor, MI 48108-2280

Tel: 734.887.4350
Fax: 734.973.7413
HaleyAldrich.com



3 November 2011
File No. 37147-009

Michigan Department of Environmental Quality
Remediation Division, Southeast Michigan District Office
27700 Donald Court
Warren, MI 48092-2793

Attention: Mr. Richard Berak

Subject: Ground-Penetrating Radar Investigation and Oil/Water Separator Inspection
at 675 Oakland Avenue, Pontiac, MI,
a.k.a 675 Cesar E Chavez Avenue, Pontiac, Michigan
or ACC Penske Property, Site #1310

Dear Mr. Berak:

Haley & Aldrich of Michigan, Inc. (Haley & Aldrich) has completed the referenced investigation and inspection on behalf of Revitalizing Auto Communities Environmental Response (RACER) Trust. This work was conducted on 29 September 2011, consistent with our memorandum to you dated 19 August 2011, and as discussed with you during our meeting with you at your office on 23 August 2011 and communicated to you via electronic mail on 31 August 2011.

Ground-Penetrating Radar Investigation

Haley & Aldrich contracted with Ground Penetrating Radar Technology of Ann Arbor, Michigan (GPRT) to scan for subsurface signs of former or existing underground storage tanks (USTs) beneath the main building present at the property, using ground-penetrating radar technology. As indicated in the enclosed report prepared by GPRT and dated 5 October 2011, a 400 megahertz antenna was utilized to collect the data, scanning to an approximate depth of 10 feet below the floor surface. The areas scanned were delineated with an approximate 3-foot interval grid pattern. Multiple scans were performed in all directions across the building floor. Figures 1 and 2 illustrate the areas of the building which were subject to this investigation. Figure 2 illustrates several areas that could not be scanned with the GPRT instruments, as they contained machinery and/or other heavy equipment, which could not be readily moved.

As noted in more detail in the enclosed GPRT report, no evidence of former or existing USTs were noted in the areas subject to investigation. Despite these findings, additional investigation may be warranted concerning the two open UST releases associated with the subject property. Accordingly, a follow-up discussion with the Michigan Department of Environmental Quality is necessary for the purpose of identifying the scope of further investigation.

Oil/Water Separator Inspection

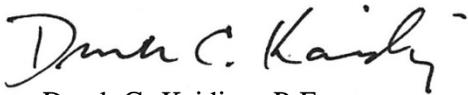
Also on 31 August 2011, Haley & Aldrich inspected the oil/water separator (OWS) mentioned in the fourth paragraph of the second page of our 19 August 2011 memorandum to you concerning this

property. This OWS was found to be constructed of concrete, with no obvious lining, and was found to measure approximately 2 feet wide by 2 feet long by 2 feet deep. It was observed to be dry, clean, and in good condition, with no cracks, spalling, or other obvious signs of significant potential release to the environment. As such, this OWS should no longer be considered a Recognized Environmental Concern.

If you have any questions, or would like any additional information concerning these matters, please call us.

Sincerely yours,

HALEY & ALDRICH OF MICHIGAN



Derek C. Kaiding, P.E.

Senior Project Manager - Vice President

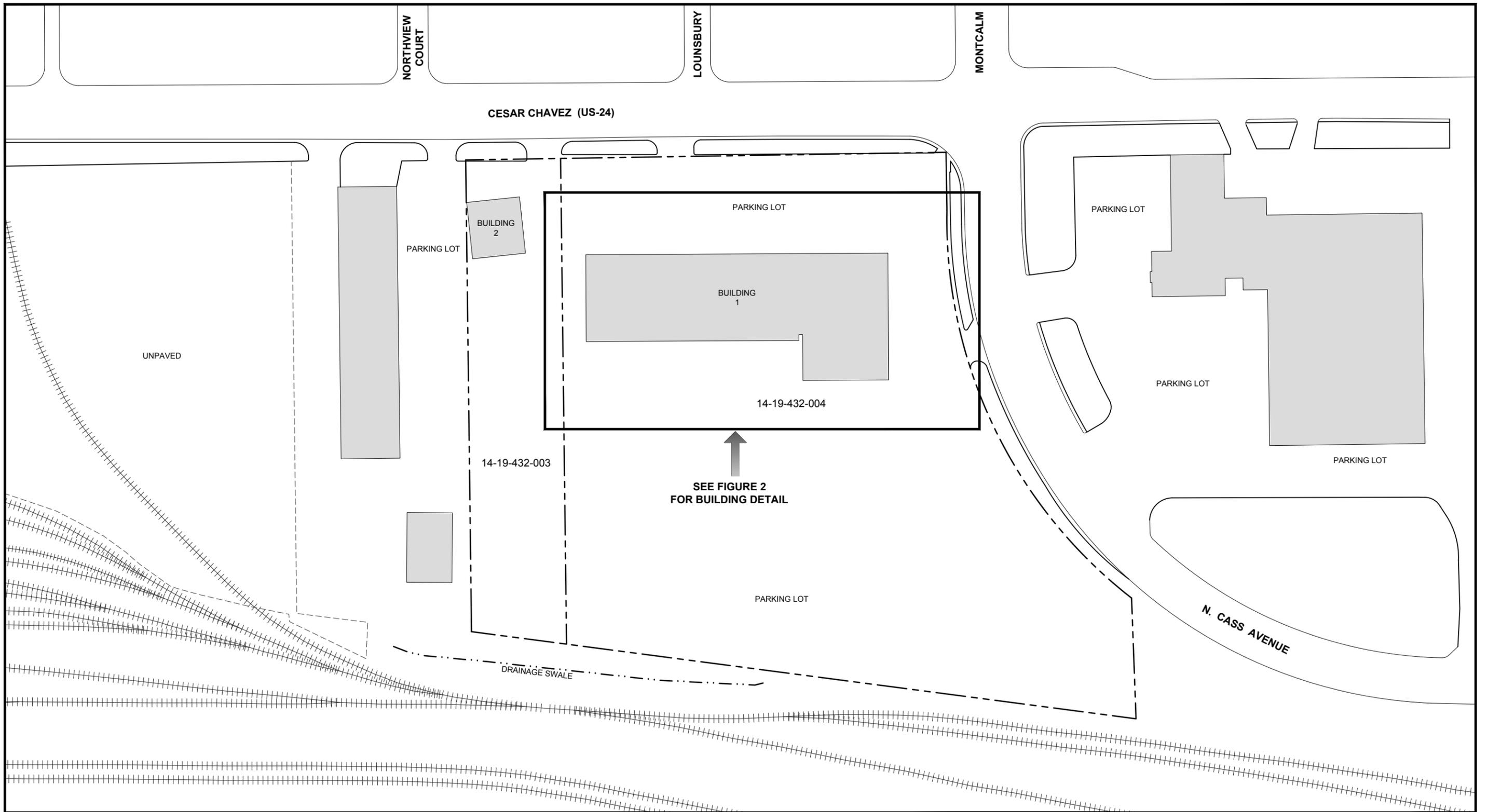
Attachments:

Figure 1 – Site Plan

Figure 2 – Building Access Areas

Ground Penetrating Radar Technology, 2011. *Locating potential underground storage tank at the subject property located at 675 Cesar E Chavez Dr. Pontiac, MI 48340. 5 October 2011.*

c: Haley & Aldrich; Attn: Mr. James Little



SEE FIGURE 2
FOR BUILDING
DETAIL

LEGEND

- PROPERTY LINE
- +++++ RAILROAD TRACKS
- .-.-.- CONCRETE DRAINAGE SWALE
- 14-19-432-004 PARCEL NUMBER
- BUILDING

NOTES

1. ALL LOCATIONS APPROXIMATE.
2. THIS FIGURE WAS GENERATED WITH THE USE OF AN AERIAL IMAGE OBTAINED FROM GOOGLE EARTH PRO, AND OAKLAND COUNTY'S PROPERTY INFORMATION LOOKUP SYSTEM.



HALEY & ALDRICH

ACC-PENSKE
675 CESAR CHAVEZ
PONTIAC, MICHIGAN

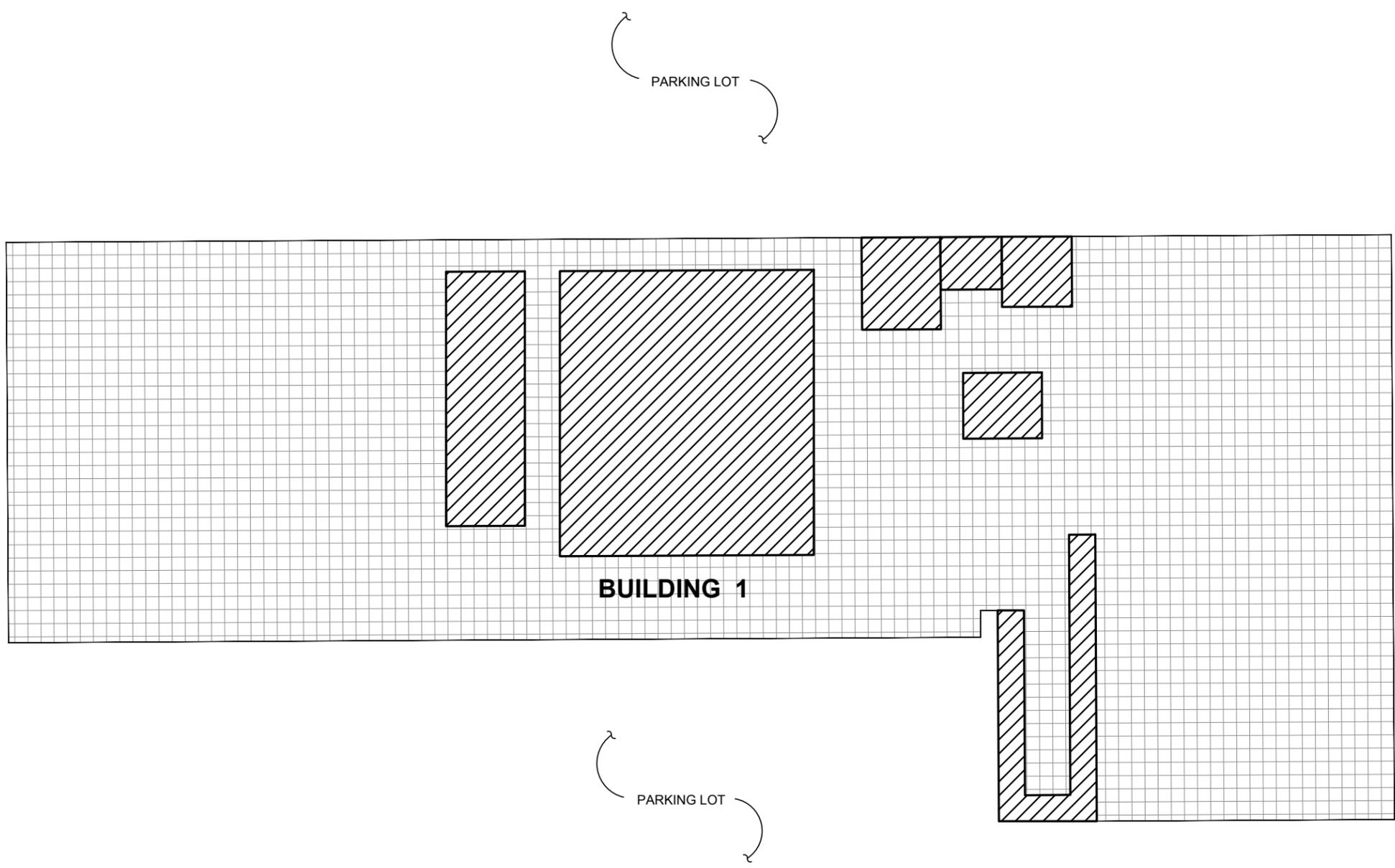
SITE PLAN

SCALE: AS SHOWN
SEPTEMBER 2011

FIGURE 1

G:\37147 - ACC PENSKE\09\CAD\37147-009.01.DWG

N. CASS AVENUE



BUILDING 1

PARKING LOT

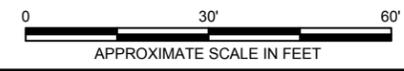
PARKING LOT

LEGEND

- PROPERTY LINE
- +++++ RAILROAD TRACKS
- BUILDING
- ▨ AREA WITH NO ACCESS DUE TO PRESENCE OF MACHINERY AND/OR PARTS NOT SUBJECT TO GPR SURVEY ON 9-30-11
- APPROXIMATE LINES OF 3-FOOT GRID PATTERN FOLLOWED BY GPR STUDY

NOTES

1. ALL LOCATIONS APPROXIMATE.
2. THIS FIGURE WAS GENERATED WITH THE USE OF AN AERIAL IMAGE OBTAINED FROM GOOGLE EARTH PRO, AND OAKLAND COUNTY'S PROPERTY INFORMATION LOOKUP SYSTEM.
3. AREAS WITH NO ACCESS TAKEN FROM FIELD MEASUREMENTS BY HALEY AND ALDRICH, INC., SEPTEMBER 2011.



HALEY & ALDRICH
 ACC-PENSKE
 675 CESAR CHAVEZ
 PONTIAC, MICHIGAN

BUILDING ACCESS AREAS

SCALE: AS SHOWN
 NOVEMBER 2011

FIGURE 2

G:\37147 - ACC PENSKE\009\CAD\37147-009.02.DWG

GPRT



Ground Penetrating Radar Technology

**Mr. Derek Kaiding
Hayley and Aldrich
3840 Packard Rd. Suite 130
Ann Arbor, MI 48108**

October 5, 2011

RE: Locating potential underground storage tank at the subject property located at 675 Cesar E Chavez Dr. Pontiac, MI 48340

A Ground Penetrating Radar (GPR) investigation was conducted at 675 Cesar E Chavez Dr. Pontiac, MI on September 29th 2011.

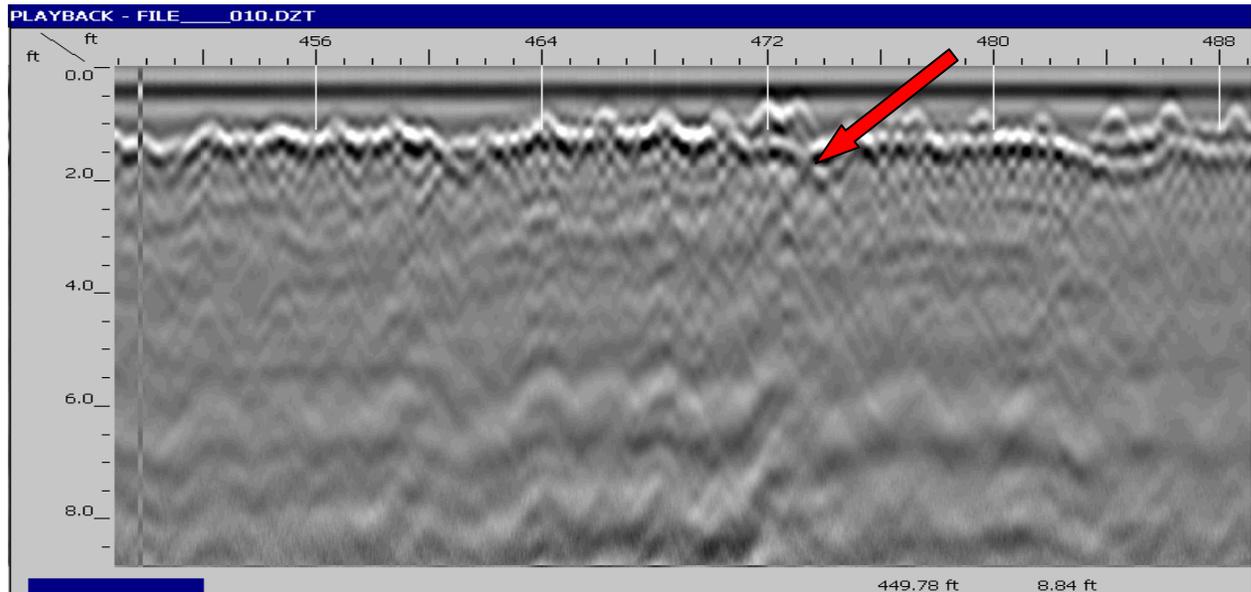
The purpose of the investigation was to determine the presence or absence of one or more underground storage tanks. The study area was the interior of a large industrial building with some equipment located inside the building.

A 400 MHZ antenna was utilized to collect the data, scanning to an approximate depth of 10 feet below ground surface. The area scanned was delineated with an approximately 3 foot interval grid pattern. Multiple scans in a North, South, East, and West direction were conducted across the subject property. This scanning approach allows for objects consistent with a underground storage tank to be located. GPRT also utilized a Magna Trak Magnetic locator. Using the locator I will check all areas that contain anomalies that are similar to that of a UST.

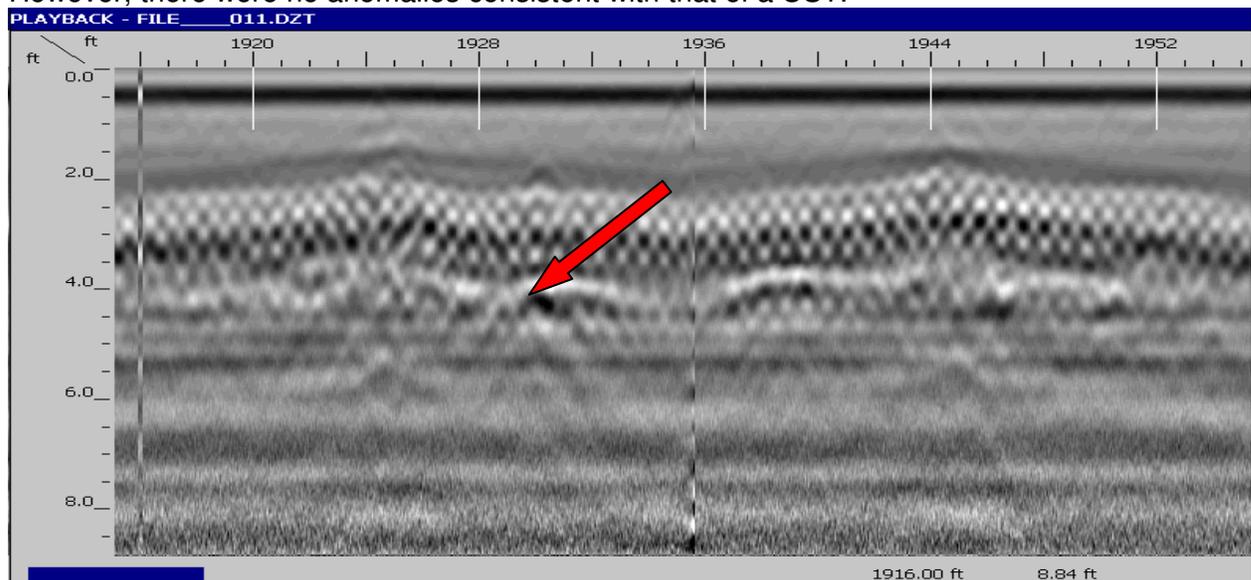
Hayley and Aldrich provided GPRT with site specs which included the historical data on underground storage tanks, as well as, Square footage of subject property.

The study area was defined by the interior of the building. Using the search pattern as explained above I was unable to locate any anomalies consistent with that of a UST. However, there were drain lines on the property that were located inside the building running to an oil-water separator in the center of the main garage area.

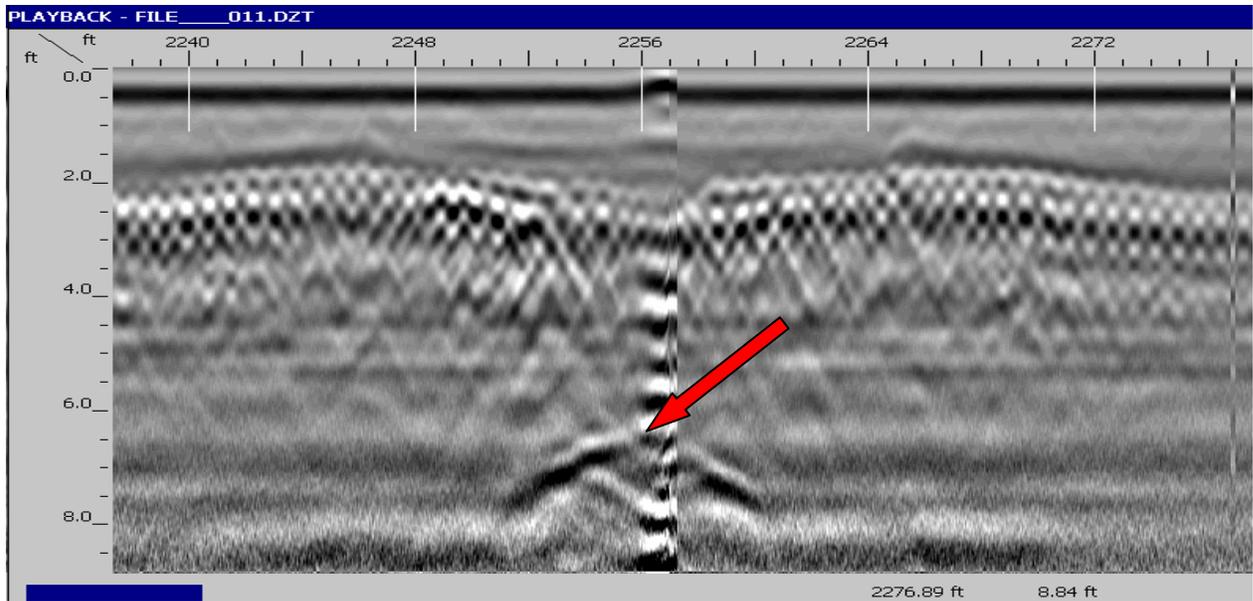
Saved Scans



This scan was collected while moving from south to north, parallel with the east side of the building. This smaller room of the building contains a loading dock and office area with future restrooms to be installed. This scan shows the typical reinforcing that is seen throughout this room. There is a layer of welded wire mesh at 16" deep and some larger rebar at a depth of 12". Throughout this room there was quite a bit of reinforcing. However, there were no anomalies consistent with that of a UST.



This scan was collected while moving from both, east to west, and west to east over a large portion of the large garage and storage area. This scan shows the typical reinforcing through the redone floor in the area. The reinforcing is at a depth of two feet. Also, the red arrow indicates a smaller drain line that was found to run north and south in the garage area.



This scan was collected while moving from east to west in the main garage area. This area is in the south-east corner of the building near a manhole cover. At a depth of 6 foot this drain line is clear and I was able to trace it to the manhole where we opened the lid and determined an accurate depth consistent with the GPR data. This scan is solely to show accurate depth readings and clarity at a depth of no less than 6 feet.

After concluding with the GPR unit I holstered the magnetic detector. The large quantities of reinforcing in the floor made magnetic detection impossible. Even in the area with very little reinforcing the Magnetic locator would spike constantly. Unfortunately, this piece of equipment was not efficient or helpful for this situation.

If you have any questions, please do not hesitate to contact me. I do appreciate the opportunity and I look forward to working with you again.

Mike Chabot
Project Manager
Ground Penetrating Radar Technology
(734)-780-6849