



FORMER HOWARD WAREHOUSE (10050) 2013 ANNUAL ENVIRONMENTAL ACTION BUDGET AUTHORIZATION REQUEST October 31, 2012

INTRODUCTION

This 2013 Annual Environmental Action (EA) Budget Authorization Request is submitted pursuant to Paragraph 49 of the Settlement Agreement and has been prepared under the supervision of Elliott Laws, Managing Member, EPLET, LLC, Administrative Trustee of the Revitalizing Auto Communities Environmental Response Trust. Attachment 1 includes a table that provides the cost breakdown that resulted in the amounts included in the property specific funding for this Site as listed in Attachment A to the Settlement Agreement.

OVERVIEW OF 2013 ANNUAL EA BUDGET AUHTORIZATION REQUEST

This 2013 Annual EA Budget Authorization Request is being submitted to request approval for activities anticipated to be completed in the 2013 calendar year. These activities include:

- Task 2 Finalization of reporting unfinished in 2012
- Task 3 Agency Oversight

2013 Annual Budget Authorization Request Amount:

\$9,345

Please see Attachment 1 for a cost breakdown that resulted in the amounts included in the property specific funding for this Site as listed in Attachment A to the Settlement Agreement; Attachment 2 for estimated costs through December 31, 2012 and Property Funding Account Balances; Attachment 3 for more details in support of the proposed 2013 EA budget; Attachment 4 for a projected schedule and milestones; and Attachment 5 for a cost reallocation for current and future years.

MODIFICATION OF REMEDIATION COST ESTIMATE SCOPE OF WORK AND BUDGET

- This Annual EA Budget Authorization Request includes work and/or budget that varies from the most recent Remediation Cost Estimate Summary (dated May, 2010) for the Site?
 - Brief Description (if checked):

APPROVALS

Revitalizing Auto Communities Environmental Response Trust

Grant Trigger, Michigan Cleanup Manager

Elliott P. Laws, Managing Member of EPLET, LLC Administrative Trustee for RACER Trust

Michigan Department of Environmental Quality

Leonard Lipinski, Authorized Representative

MDEQ Remediation Division

Date

DETAILED SUPPORT FOR THE 2013 ANNUAL EA BUDGET AUTHORIZATION REQUEST

Attachment 1 - Original Cost Breakdown

Attachment 2 - Cost to Date (since July 1, 2010) and Property Funding Account Balances

Attachment 3 – Scope of Work and Detailed Budget Estimate for the 2013 Annual EA Budget
Authorization Request

Attachment 4 - Projected 2013 Schedule and Milestones

Attachment 5 - Current and Future Years Cost Reallocation



Remediation Cost Estimate Modifications

and 2013 Budget Recommendations

Former Howard Warehouse

Introduction

A Remediation Cost Estimate Summary ("RCES") was prepared for each of the former General Motors sites controlled by Motors Liquidation Company ("MLC"). When the Bankruptcy Court approved the formation of the Revitalizing Auto Communities Environmental Response Trust ("RACER") the budgets adopted by MLC provided the basis for the allocation of funding for each site listed on Attachment A to the Environmental Response Trust Consent Decree and Settlement Agreement ("Settlement Agreement"). The anticipated scope of work and the schedule for each site were also included in each RCES.

Under the Settlement Agreement RACER is obligated annually to prepare and review with the applicable lead agency a proposed budget and schedule. The budget must be approved by the lead agency.

This summary is intended to explain any adjustments to the scope of work or other modifications to the RCES to create an evolving record of the scope of work and budget for each site. Because the original RCES was based by necessity on a range of assumptions, as new and better information is developed for each site the scope of work and budgets must be refined accordingly. This cover memo highlights and documents those changes and explains how issues have evolved at the site based on new or better information. It is intended that this summary will be prepared for each site each year until the conclusion of the remedial work.

2013 Budget Request

The following highlights the primary budget components for 2013. Detailed backup summaries and explanation of work plan details are included in the 2013 budget request – attached (as Exhibit B) after the Revised May 2010 RCES (Exhibit A).

Task 2 Soil Excavation and ReportingTask 3 Agency Oversight\$445

Totals \$9,345

Modifications from 2011 Edition of the RCES

1 The scope of the 2013 tasks generally reflects the RCES.

Project Summary

The schedules originally adopted by MLC and reflected in the RCES are generally overly optimistic due in large part to the preliminary nature of the site characterization information that was available – the Former Howard Warehouse site required some additional investigation. While certain work was completed later than originally scheduled the work will be completed within the overall budget.

The majority of the work associated with the Former Howard Warehouse is expected to be completed in 2012. Tasks expected to remain for 2013 include finalizing the No Further Action Report.



Remediation Cost Estimate Summary Former Howard Warehouse – Vacant Land

MLC ID 1005

October 27, 2009 Revised May 2010



Table of Contents

Background Information	3
Real Estate Information	3
Environmental History	4
Current Environmental Issues	5
Remediation Scope of Work and Cost Estimate	5
Regulatory Requirements	7
Project Schedule and Estimated Cost	7
Remediation Cost Estimate Summary Spreadsheet	9
Annendix A - Notes and Calculations	



Background Information

The Former Howard Warehouse property is a 3.8-acre vacant property located at 700 Garey Street in Saginaw, Michigan (site). The site is bounded by Garey Street to the north, Brown Street to the east, railroad tracks to the south, and Owen Street (vacated) to the west. The site is located in an area of mixed residential and industrial/commercial uses.

Based on information obtained from a Phase I Environmental Site Assessment (ESA) (Conestoga-Rovers & Associates [CRA], September 2006), Nelson Brothers Company, a manufacturer of gasoline engines, occupied the site from approximately 1924 through 1940. General Motors Corporation (formerly GM, now Motors Liquidation Company MLC]) began leasing the building in 1945, and was reportedly subleasing the site to Howard Industries and Palace Corporation (automobile trailer and/or portable building manufacturers) and Sears Roebuck & Company (for use as a warehouse). Other occupants that reportedly subleased the property included the United States Navy, Baker Perkins, Kochton Corporation, and General Electric. GM purchased the site in 1979, and many of the companies listed above continued to occupy the building until it was demolished in 1988.

Selected background information is provided below:

- <u>Site Location</u>
 Former Howard Warehouse/Vacant land 700 Garey Street, Saginaw, Michigan
- <u>USEPA ID Numbers</u> None

Real Estate Information

The following is a summary of selected real estate information for the site:

- Current Land Use and Zoning/Permitted Use Vacant
- Zoning Industrial
- Building and Improvements Building demolished in 1988
- Size, Age, Condition 3.8 acres vacant
- Infrastructure Unknown



Environmental History

The Phase I ESA identified several recognized environmental conditions (RECs), which included:

- One 800-gallon gasoline underground storage tank (UST) was located near the northwestern
 corner of the building, and one 1,000-gallon fuel oil UST was located in the courtyard of the
 building. There was no other information available as to whether these USTs were still in
 place or removed. In addition, the site is not listed in the Michigan Department of Natural
 Resources and Environment (MDNRE) UST database as having USTs or releases from
 USTs.
- Files obtained by CRA from the MDNRE indicated that an approximately 300-gallon UST was removed from the site in October 1988, but the location was not provided. Notes from the MDNRE file indicated that a strong petroleum odor was noted in the pit where the tank was removed and six soil samples were collected from the area. The MDNRE files did not indicate if soil was excavated, and the file did not have information regarding the analytical results of the soil samples. Information in the file did not indicate if a closure assessment had been performed or was necessary.
- One 1,000-gallon aboveground storage tank (AST) was depicted on maps at the northeastern corner of the site building. The AST is not currently located at the site, but the Phase I ESA did not indicate if a closure assessment had been performed or was necessary.
- Hazardous wastes may have been generated at the site based on past manufacturing
 operations (i.e., machining, painting/spraying, dipping, and acetylene generation processes)
 performed by Nelson Brothers Company and Howard Industries and Palace Corporation. A
 1935 Sanborn map illustrated that the building was used as a foundry and identified cooling
 sheds with earthen floors.
- CRA indicated in the Phase I ESA that 1940 and 1951 site maps apparently generated by the Saginaw Steering Gear Division of GM depicted an area labeled as transformers in the courtyard of the building. In addition, CRA reported in the Phase I ESA that personnel indicated that equipment containing polychlorinated biphenyls (PCBs) was formerly stored outside the building.
- A 1940 site map apparently generated by the Saginaw Steering Gear Division of GM depicted a coal pile outside the south end of the building and adjacent to the railroad tracks.
- A portion of the site to the east of the building was also apparently used to store fire bricks, pig iron, coke piles, a flask yard, scrap steel, and other materials.
- The 1984 GM purchase order for demolition of the site specified that the building be demolished to 1 foot below existing grade and all machine foundations and pits were to be removed to 1 foot below the floor. No documentation of demolition activities was available.



- A Sanborn Map from 1969 indicated that an adjacent property to the southwest was used for dry cleaning.
- A search of available environmental records was conducted by Environmental Data Resources, Inc. (EDR), and the site was not listed in any of the databases searched by EDR.

Current Environmental Issues

A Phase II ESA was conducted at the site by CRA between December 2006 and November 2008. A total of 104 soil borings were advanced across the site, as well as in the area of each of the RECs, at three former doorways to the building one in the loading area, and three in the estimated location of the USTs. A review of the boring logs provided by CRA indicated that the underlying soils generally consist of sand from the ground surface down to depths ranging between approximately 2 to 5 feet, and the sand is underlain by clay that extends down to at least 10 feet below ground surface (bgs).

The results of the Phase II ESA were summarized in a Draft Memorandum Phase II ESA Investigation Results (CRA, April 2008) and indicated the following:

- The Residential Direct Contact Criteria (RDCC) for soil was exceeded for arsenic in five of the samples from the 104 borings.
- Soil samples at five locations exceeded the RDCC for lead (400 milligrams per kilogram [mg/kg]). These five samples were confined to one small area of the site. Additional sampling events conducted in September 2007 and November 2007 and stepout borings were completed at BH13, which previously exceeded the RDCC. The sampling results from locations BH136, BH13N, BH135, BH13D, and BH13S characterize the horizontal and vertical extent of lead above screening criteria at BH13; however, soil sample location BH13W (with a lead concentration of 823 mg/kg) has not been delineated to the south (towards the property line).
- Soil samples at five locations exceeded the RDCC for benzo(a)pyrene; however, the concentrations (3.7 mg/kg to 14 mg/kg) were marginally above the RDCC of 2 mg/kg. Benzo(a)pyrene concentrations in soil were delineated both horizontally and vertically at one sampling location (BH18) during the Phase II ESA. CRA concluded that the remaining four sampling locations were near roads along the perimeter of the property, and are not believed to be site-related.

Remediation Scope of Work and Cost Estimate

This "Remediation Scope of Work and Cost Estimate" summarizes the discussions and agreements between MLC and applicable environmental regulatory agencies in connection with the plan of reorganization or liquidation for MLC, including the establishment of a postconfirmation trust to complete remediation. The objectives of this Remediation Scope of Work and Cost Estimate are to: i) describe activities and associated, assumed costs that are focused on MLC's goal of bringing the site to regulatory closure within the timeframes indicated in the



accompanying "Project Schedule" table; and/or ii) describe any necessary long-term operation, maintenance, and monitoring tasks and associated, assumed costs that may be required for maintaining an environmentally protective remedy for the specified timeframe.

The scope of work presented below is based on the assumptions concerning conditions, rates, other costs, and other variables stated herein and in referenced documents. Significant variances from these assumptions may result, if more favorable, in reductions in the scope and/or costs, and if less favorable, in increased or different scope and/or costs.

Groundwater was not encountered during site investigation work and a continuous extensive clay layer underlies the site. Therefore, the Residential Drinking Water Protection criteria are not applicable and no groundwater remediation is proposed. The remediation scope of work assumes that site soils will be cleaned up to meet the MDNRE's RDCC for benzo(a)pyrene and lead. Arsenic concentrations in soil were within the statewide background concentrations; therefore, no further investigation with respect to arsenic is necessary for the site. Remediation work will include soil delineation sampling and analysis activities, as well as soil removal and off-site disposal of the impacted soil. The remediation cost estimates reflect these activities and are described in more detail below

The remediation cost estimate for this site in current dollars (2010) is \$241,500. This cost is based on a total Estimated Baseline/Engineering Cost of \$200,000 plus a 15 percent contingency (\$30,000), as well as an Agency Oversight cost of \$11,500. The Remediation Cost Estimate Summary spreadsheet provides a year by year breakdown of costs for each task included in this estimate. In addition, Appendix A includes a more detailed cost breakdown that supports these estimates.

Soil Delineation Sampling and Analysis and Reporting

Soil sampling, analysis, and reporting will be completed in 2010 to delineate soils identified in the Phase II ESA that are impacted with benzo(a)pyrene and lead and exceed the MDNRE's RDCC. It is assumed that the MDNRE concludes that the benzo(a)pyrene exceedances at the four locations along the boundary of the site are due to site activities and will require delineation, as well as with the benzo(a)pyrene-impacted and lead-impaced soil identified on the property. The Estimated Baseline/Engineering Cost for this initial sampling event is \$25,000, which includes analytical costs and labor for sampling, data evaluation, and reporting.

The cost estimate also includes an allowance for an additional sampling event in case the results of the initial sampling event do not fully delineate the impacted soil. The Estimated Baseline/Engineering Cost for this additional sampling event, if needed, is \$12,500, and also includes analytical costs and labor for sampling data evaluation, and reporting.

Based on communication with the Agency, it was agreed upon to include an additional allowance of \$37,500 to the cost estimate for the investigation/reporting; however, the need for this expenditure has yet to be determined, and thus, the expenditure for this task remains as a potential cost that may not be incurred and is subject to further evaluation.



The total Estimated Baseline/Engineering Cost for this activity is estimated at \$75,000 should the entire scope of work be implemented. The additional sampling event may not be required and associated cost (\$12,500) may not be incurred if the impacted soil limits are fully delineated during the initial sampling event. In addition, the total cost may not be incurred if the MDNRE concludes that benzo(a)pyrene-impacted and lead-impacted soil along and within the site does not require delineation.

Soil Excavation and Reporting

Benzo(a)pyrene-impacted and lead-impacted soils exceeding the MDNRE's RDCC will be excavated and transported off site for disposal. It is assumed that for the purposes of this cost estimate and scope of work that the benzo(a)pyrene exceedances at the four locations along the boundary of the site are due to site activities and will require remediation, as well as with the benzo(a)pyrene-impacted and lead-impacted soil identified on the property. Unless site investigations demonstrate otherwise, it is anticipated that this work will include:

- Excavation and off-site disposal of approximately 185 cubic yards of benzo(a)pyreneimpacted soil from the ground surface to approximately 2 feet bgs from five locations with an area of approximately 500 square feet each (total area of 2,500 square feet).
- Excavation and off-site disposal of approximately 370 cubic yards of lead-impacted soil from the ground surface to approximately 2 feet bgs in an area of approximately 5,000 square feet.
- Backfilling and surface restoration (i.e., topsoil and grass seed) of the excavated areas.
- Preparation of a report that will summarize the completed soil removal activities.

The total Estimated Baseline/Engineering Cost for this activity is \$125,000. The total cost for this activity may be reduced if less impacted soil is identified or if the MDNRE concludes that benzo(a)pyrene-impacted soil along the site boundary does not require remediation.

Regulatory Requirements

There are currently no regulatory requirements established for the site. However, the current remedial strategy for the site assumes that the site will have unrestricted land use. Therefore, future activities performed at the site will be performed to meet the MDNRE's RDCC developed by the State of Michigan under Part 201 of the Natural Resources and Environmental Protection Act 451 (NREPA).

Project Schedule and Estimated Cost

The project schedule and estimated cost for the anticipated work to be performed is presented below. The estimate presented below does not include Agency oversight or contingency costs.



Timeframe	Event	Responsibility	Estimated Baseline/Engineering Cost ^{1,2}
2010	Soil Delineation Sampling and Analysis and Reporting	MLC	\$75,000
2011	Soil Excavation and Reporting	MLC	\$125,000

Notes:

- Contingency not included in cost table.
 Agency oversight cost not included. As shown below in the Remediation Cost Estimate Summary, the Agency oversight cost for each year assumed 5 percent of the sum of the total Estimated Baseline/Engineering Cost for the year and the specified contingency amount.



Year	No.	Site Assessment and Reporting	Contingency	Soil Excavation and Reporting	Contingency	Agency Oversight
2010	1	\$ 75,000	15%	\$ -	10%	\$ 4,313
2011	2	\$ -	10%	\$ 125,000	15%	\$ 7,188
2012	3	\$ -	10%	\$ -	10%	\$ -
2013	4	\$ -	10%	\$ -	10%	\$ -
2014	5	\$ -	10%	\$ -	10%	\$ -
2015	6	\$ -	10%	\$ -	10%	\$ -
2016	7	\$ -	10%	\$ -	10%	\$ -
2017	8	\$ -	10%	\$ -	10%	\$ -
2018	9	\$ -	10%	\$ -	10%	\$ -
2019	10	\$ -	10%	\$ -	10%	\$ -
2020	11	\$ -	10%	\$ -	10%	\$ -
2021	12	\$ -	10%	\$ -	10%	\$ -
2022	13	\$ -	10%	\$ -	10%	\$ -
2023	14	\$ -	10%	\$ -	10%	\$ -
2024	15	\$ -	10%	\$ -	10%	\$ -
2025	16	\$ -	10%	\$ -	10%	\$ -
2026	17	\$ -	10%	\$ -	10%	\$ -
2027	18	\$ -	10%	\$ -	10%	\$ -
2028	19	\$ -	10%	\$ -	10%	\$ -
2029	20	\$ -	10%	\$ -	10%	\$ -
2030	21	\$ -	10%	\$ -	10%	\$ -
2031	22	\$ -	10%	\$ -	10%	\$ -
2032	23	\$ -	10%	\$ -	10%	\$ -
2033	24	\$ -	10%	\$ -	10%	\$ -
2034	25	\$ -	10%	\$ -	10%	\$ -
2035	26	\$ -	10%	\$ -	10%	\$ -
2036	27	\$ -	10%	\$ -	10%	\$ -
2037	28	\$ -	10%	\$ -	10%	\$ -
2038	29	\$ -	10%	\$ -	10%	\$ -
2039	30	\$ -	10%	\$ -	10%	\$ -



Appendix A

Notes and Calculations

APPENDIX A - Notes and Calculations 1005 Former Howard Warehouse - Vacant Land

		SITE ASSESSMENT AND REPORTING						
Item			Estimated	Unit		Unit Cost	Es	timated Yearly
No.			Quantity per					Cost
			year					
I	Site Assessment	and Reporting						
		Project Manager	8	Hours	\$	160.00	\$	1,280.00
		Professional Geologist/Engineer (Reporting)	40	Hours	\$	140.00	\$	5,600.00
		Field Geologist/Engineer (2)	80	Hours	\$	120.00	\$	9,600.00
		Graphics/Typist	8	Hour	\$	65.00	\$	520.00
		Clerical/Word Processor	10	Hours	\$	50.00	\$	500.00
		Field Equipment/Expenses	1	Lump Sum	\$	2,500.00	\$	2,500.00
		Subcontractor: Laboratory	50	Sample	\$	100.00	\$	5,000.00
						I Subtotal	\$	25,000.00
II	Contingency Site	e Assessment and Reporting						
		Project Manager	4	Hours	\$	160.00	\$	640.00
		Professional Geologist/Engineer (Reporting)	20	Hours	\$	140.00	\$	2,800.00
		Field Geologist/Engineer (2)	40	Hours	\$	120.00	\$	4,800.00
		Graphics/Typist	4	Hour	\$	60.00	\$	240.00
		Clerical/Word Processor	6	Hours	\$	45.00	\$	270.00
		Expenses (Travel, etc.)	1	Lump Sum	\$	1,250.00	\$	1,250.00
		Subcontractor: Laboratory	25	Sample	\$	100.00	\$	2,500.00
						II Subtotal	\$	12,500.00
			Additional	Costs agreed	to	with Agoney	\$	37,500.00
			Auditional	Costs agreeu	. 10	with Agency	φ	37,300.00
SUBT	OTAL - SITE ASS	ESSMENT AND REPORTING					\$	75,000.00
					Ro	unded Total:	\$	75,000.00
		SOIL EXCAVATION AND REPORTING			Ro	unded Total:	\$	75,000.00
Item		SOIL EXCAVATION AND REPORTING	Estimated	Unit	Ro	unded Total: Unit Cost		75,000.00
Item No.		SOIL EXCAVATION AND REPORTING	Estimated Quantity per	Unit	Ro			,
		SOIL EXCAVATION AND REPORTING		Unit	Ro			stimated Yearly
	Soil Excavation	SOIL EXCAVATION AND REPORTING	Quantity per	Unit	Ro			stimated Yearly
No.	Soil Excavation		Quantity per	Unit	Ro		Es	stimated Yearly
No.	Soil Excavation	Project Manager	Quantity per year		\$	Unit Cost	Es	stimated Yearly Cost
No.	Soil Excavation	Project Manager Field Geologist/Engineer (2)	Quantity per year	Hours Hours		Unit Cost	Es	ctimated Yearly Cost
No.	Soil Excavation	Project Manager Field Geologist/Engineer (2) Field Equipment/Expenses	Quantity per year 8 80	Hours	\$ \$ \$	Unit Cost 160.00 120.00	Es \$ \$ \$ \$ \$	1,280.00 9,600.00 2,500.00
No.	Soil Excavation	Project Manager Field Geologist/Engineer (2)	Quantity per year 8 80 1	Hours Hours Lump Sum	\$ \$	Unit Cost 160.00 120.00 2,500.00	Es	ctimated Yearly Cost 1,280.00 9,600.00
No.		Project Manager Field Geologist/Engineer (2) Field Equipment/Expenses Subcontractor: Excavation, Transporation, Disposal	Quantity per year 8 80 1 775	Hours Hours Lump Sum Tons	\$ \$ \$	Unit Cost 160.00 120.00 2,500.00 130.00	\$ \$ \$ \$ \$ \$ \$ \$ \$ \$	1,280.00 9,600.00 2,500.00 100,750.00
No.	Soil Excavation	Project Manager Field Geologist/Engineer (2) Field Equipment/Expenses Subcontractor: Excavation, Transporation, Disposal Subcontractor: Laboratory	Quantity per year 8 80 1 775 25	Hours Hours Lump Sum Tons Sample	\$ \$ \$ \$	160.00 120.00 2,500.00 130.00 100.00 I Subtotal	\$ \$ \$ \$ \$ \$ \$ \$ \$ \$	1,280.00 9,600.00 2,500.00 100,750.00 2,500.00
No.		Project Manager Field Geologist/Engineer (2) Field Equipment/Expenses Subcontractor: Excavation, Transporation, Disposal Subcontractor: Laboratory Project Manager	Quantity per year 8 80 1 775 25	Hours Hours Lump Sum Tons Sample Hours	\$ \$ \$ \$	160.00 120.00 2,500.00 130.00 100.00 I Subtotal 160.00	Es \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	1,280.00 9,600.00 2,500.00 100,750.00 2,500.00 116,630.00
No.		Project Manager Field Geologist/Engineer (2) Field Equipment/Expenses Subcontractor: Excavation, Transporation, Disposal Subcontractor: Laboratory Project Manager Professional Geologist/Engineer (Reporting)	Quantity per year 8 80 1 775 25	Hours Hours Lump Sum Tons Sample Hours	\$ \$ \$ \$ \$	160.00 120.00 2,500.00 130.00 100.00 I Subtotal 160.00 140.00	\$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	1,280.00 9,600.00 2,500.00 100,750.00 2,500.00 116,630.00 1,600.00 5,600.00
No.		Project Manager Field Geologist/Engineer (2) Field Equipment/Expenses Subcontractor: Excavation, Transporation, Disposal Subcontractor: Laboratory Project Manager Professional Geologist/Engineer (Reporting) Graphics/Typist	Quantity per year 8 80 1 775 25	Hours Hours Lump Sum Tons Sample Hours Hours Hours	\$ \$ \$ \$ \$ \$ \$ \$ \$	160.00 120.00 2,500.00 130.00 100.00 I Subtotal 160.00 140.00 60.00	\$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	1,280.00 9,600.00 2,500.00 100,750.00 2,500.00 116,630.00 1,600.00 5,600.00 480.00
No.		Project Manager Field Geologist/Engineer (2) Field Equipment/Expenses Subcontractor: Excavation, Transporation, Disposal Subcontractor: Laboratory Project Manager Professional Geologist/Engineer (Reporting) Graphics/Typist Clerical/Word Processor	Quantity per year 8 80 1 775 25	Hours Hours Lump Sum Tons Sample Hours Hours Hours Hour	\$ \$ \$ \$ \$ \$ \$ \$ \$	160.00 120.00 2,500.00 130.00 100.00 I Subtotal 160.00 140.00 60.00 45.00	\$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	1,280.00 9,600.00 2,500.00 100,750.00 2,500.00 116,630.00 1,600.00 480.00 360.00
No.		Project Manager Field Geologist/Engineer (2) Field Equipment/Expenses Subcontractor: Excavation, Transporation, Disposal Subcontractor: Laboratory Project Manager Professional Geologist/Engineer (Reporting) Graphics/Typist	Quantity per year 8 80 1 775 25	Hours Hours Lump Sum Tons Sample Hours Hours Hours	\$ \$ \$ \$ \$ \$ \$ \$ \$	160.00 120.00 2,500.00 130.00 100.00 I Subtotal 160.00 140.00 60.00	\$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	1,280.00 9,600.00 2,500.00 100,750.00 2,500.00 116,630.00 1,600.00 5,600.00 480.00
No.		Project Manager Field Geologist/Engineer (2) Field Equipment/Expenses Subcontractor: Excavation, Transporation, Disposal Subcontractor: Laboratory Project Manager Professional Geologist/Engineer (Reporting) Graphics/Typist Clerical/Word Processor	Quantity per year 8 80 1 775 25	Hours Hours Lump Sum Tons Sample Hours Hours Hours Hour	\$ \$ \$ \$ \$ \$ \$ \$ \$	160.00 120.00 2,500.00 130.00 100.00 I Subtotal 160.00 140.00 60.00 45.00	\$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	1,280.00 9,600.00 2,500.00 100,750.00 2,500.00 116,630.00 1,600.00 480.00 360.00
No. I	Reporting	Project Manager Field Geologist/Engineer (2) Field Equipment/Expenses Subcontractor: Excavation, Transporation, Disposal Subcontractor: Laboratory Project Manager Professional Geologist/Engineer (Reporting) Graphics/Typist Clerical/Word Processor Expenses	Quantity per year 8 80 1 775 25	Hours Hours Lump Sum Tons Sample Hours Hours Hours Hour	\$ \$ \$ \$ \$ \$ \$ \$ \$	160.00 120.00 2,500.00 130.00 100.00 I Subtotal 160.00 140.00 60.00 45.00 350.00	\$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	1,280.00 9,600.00 2,500.00 100,750.00 2,500.00 116,630.00 480.00 360.00 350.00
No. I	Reporting	Project Manager Field Geologist/Engineer (2) Field Equipment/Expenses Subcontractor: Excavation, Transporation, Disposal Subcontractor: Laboratory Project Manager Professional Geologist/Engineer (Reporting) Graphics/Typist Clerical/Word Processor	Quantity per year 8 80 1 775 25	Hours Hours Lump Sum Tons Sample Hours Hours Hours Hour	\$ \$ \$ \$ \$ \$ \$ \$ \$	160.00 120.00 2,500.00 130.00 100.00 I Subtotal 160.00 140.00 60.00 45.00 350.00	\$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	1,280.00 9,600.00 2,500.00 100,750.00 2,500.00 116,630.00 480.00 360.00 350.00
No. I	Reporting	Project Manager Field Geologist/Engineer (2) Field Equipment/Expenses Subcontractor: Excavation, Transporation, Disposal Subcontractor: Laboratory Project Manager Professional Geologist/Engineer (Reporting) Graphics/Typist Clerical/Word Processor Expenses	Quantity per year 8 80 1 775 25	Hours Hours Lump Sum Tons Sample Hours Hours Hours Hour	\$ \$ \$ \$ \$ \$ \$ \$ \$ \$	160.00 120.00 2,500.00 130.00 100.00 I Subtotal 160.00 140.00 60.00 45.00 350.00	\$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	1,280.00 9,600.00 2,500.00 100,750.00 2,500.00 116,630.00 480.00 360.00 350.00





FORMER HOWARD WAREHOUSE (10050) 2013 ANNUAL ENVIRONMENTAL ACTION BUDGET AUTHORIZATION REQUEST October 31, 2012

INTRODUCTION

This 2013 Annual Environmental Action (EA) Budget Authorization Request is submitted pursuant to Paragraph 49 of the Settlement Agreement and has been prepared under the supervision of Elliott Laws, Managing Member, EPLET, LLC, Administrative Trustee of the Revitalizing Auto Communities Environmental Response Trust. Attachment 1 includes a table that provides the cost breakdown that resulted in the amounts included in the property specific funding for this Site as listed in Attachment A to the Settlement Agreement.

OVERVIEW OF 2013 ANNUAL EA BUDGET AUHTORIZATION REQUEST

This 2013 Annual EA Budget Authorization Request is being submitted to request approval for activities anticipated to be completed in the 2013 calendar year. These activities include:

- Task 2 Finalization of reporting unfinished in 2012
- Task 3 Agency Oversight

2013 Annual Budget Authorization Request Amount:

\$9,345

Please see Attachment 1 for a cost breakdown that resulted in the amounts included in the property specific funding for this Site as listed in Attachment A to the Settlement Agreement; Attachment 2 for estimated costs through December 31, 2012 and Property Funding Account Balances; Attachment 3 for more details in support of the proposed 2013 EA budget; Attachment 4 for a projected schedule and milestones; and Attachment 5 for a cost reallocation for current and future years.

MODIFICATION OF REMEDIATION COST ESTIMATE SCOPE OF WORK AND BUDGET

This Annual EA Budget Authorization Request includes work and/or budget that varies from the most recent Remediation Cost Estimate Summary (dated May, 2010) for the Site?

Brief Description (if checked):

APPROVALS

Revitalizing Auto Communities Environmental Response Trust

Elliott P. Laws, Managing Member of EPLET, LLC
Administrative Trustee for RACER Trust

Michigan Department of Environmental Quality

Leonard Lipinski, Authorized Representative MDEQ Remediation Division	Date	

DETAILED SUPPORT FOR THE 2013 ANNUAL EA BUDGET AUTHORIZATION REQUEST

- Attachment 1 Original Cost Breakdown
- Attachment 2 Cost to Date (since July 1, 2010) and Property Funding Account Balances
- Attachment 3 Scope of Work and Detailed Budget Estimate for the 2013 Annual EA Budget Authorization Request
- Attachment 4 Projected 2013 Schedule and Milestones
- Attachment 5 Current and Future Years Cost Reallocation

ATTACHMENT 1

Original Cost Breakdown

Attachment 1 - Original Cost Estimate Former Howard Warehouse - 2013 Budget Request

Former Howard Warehouse - 10050 Schedule of Cash Flows established by MLC

	Remediation Cost Estimate - Settlement Agreement												
Year	Minimum	Reserve	Long-Term Operation, Monitoring and Maintenance (LTOMM)	Laddered Rates	Total Cost 2009 Dollars	Contingency Cost	Expected Cost	Site Assessment and Reporting	Contingency	Soil Excavation and Reporting	Contingency	Agency Oversight	
2009	\$ -	\$ -		\$ -	\$ -	\$ -	\$ -	\$ -		\$ -	15%	\$ -	
2010	\$ -	\$ -		\$ -	\$ -	\$ -	\$ -	\$ -		\$ -	15%	\$ -	
2011	7 /-	\$ 37,238		\$ 248,252	\$ 241,500	\$ 30,000.00	\$ 211,500.00	\$ 75,000		\$ 125,000	15%	\$ 11,500	
2012		\$ -		\$ -	\$ -	\$ -	\$ -	\$ -		\$ -	15%	\$ -	
2013	\$ -	\$ -		\$ -	\$ -	\$ -	\$ -	\$ -	15%	\$ -	15%	\$ -	
2014	\$ -	\$ -		\$ -	\$ -	\$ -	\$ -	\$ -	15%	\$ -	15%	\$ -	
2015	\$ -	\$ -		\$ -	\$ -	\$ -	\$ -	\$ -	15%	\$ -	15%	\$ -	
2016	\$ -	\$ -		\$ -	\$ -	\$ -	\$ -	\$ -	15%	\$ -	15%	\$ -	
2017	\$ -	\$ -		\$ -	\$ -	\$ -	\$ -	\$ -	15%	\$ -	15%	•	
2018	\$ -	\$ -		\$ -	\$ -	\$ -	\$ -	\$ -	15%	\$ -	15%	•	
2019	\$ -	\$ -		\$ -	\$ -	\$ -	\$ -	\$ -		\$ -	15%		
2020			\$ -	\$ -	\$ -	\$ -	\$ -	\$ -		\$ -	15%		
2021			\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	15%	\$ -	15%	\$ -	
2022			\$ -	\$ -	\$ -	\$ -	\$ -	\$ -		\$ -	15%		
2023			\$ -	\$ -	\$ -	\$ -	\$ -	\$ -		\$ -	15%		
2024			\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	15%	\$ -	15%	\$ -	
2025			\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	15%	\$ -	15%	\$ -	
2026			\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	15%	\$ -	15%	\$ -	
2027			\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	15%	\$ -	15%	\$ -	
2028			\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	15%	\$ -	15%	\$ -	
2029			\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	15%	\$ -	15%	\$ -	
2030			\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	15%	\$ -	15%	\$ -	
2031			\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	15%	\$ -	15%	\$ -	
2032			\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	15%	\$ -	15%	\$ -	
2033			\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	15%	\$ -	15%	\$ -	
2034			\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	15%	\$ -	15%	\$ -	
2035			\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	15%	\$ -	15%	\$ -	
2036			\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	15%	\$ -	15%	\$ -	
2037			\$ -	\$ -	\$ -	\$	\$ -	\$ -	15%	\$ -	15%	\$ -	
2038			\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	15%	\$ -	15%	\$ -	
	\$ 211.014	\$ 37,238	\$ -	\$ 248,252	\$ 241,500	\$ 30,000	\$ 211,500	\$ 75,000		\$ 125.000		\$ 11,500	

10050 Page 1 of 1

ATTACHMENT 2 Cost to Date (since July 1, 2010) and Property Funding Account Balances

Attachment 2 - Cost to Date (since July 1, 2010) Former Howard Warehouse - 2013 Budget Request

Former Howard Warehouse - 10050

Task Description	- Site Assessment and Reporting	T	02 - Soil Excavation and Reporting	Estim	ated Total Cost
2010 (1)	\$ -	\$	-	\$	-
2011 (2)	\$ 13,339	\$	-	\$	13,339
2012 (3)	\$ 3,523	\$	45,908	\$	49,431
Cumulative	\$ 16,862	\$	45,908	\$	62,770
			Total Estimated Cost	\$	62,770

Notes:

- (1) July 1, 2010 through December 31, 2010
- (2) 2011 January 1 through December 31, 2011
- (3) 2012 estimated reflects actual spent from January through August 2012 (\$41,931) and projected spend (\$7,500) for September through December 31, 2012

10050 Page 1 of 1

Attachment 2 - Property Funding Accounts Balances Former Howard Warehouse - 2013 Budget Request

Property Funding Accounts Per Settlement

Agreement		1-Jul-2010 1-Apr-2011		-Apr-2011	31	-Dec-2011	31-Aug-2012		
Minimum Estimated Property Funding	\$	211,014	\$	180,443	\$	199,163	\$	156,901	
Reserve Property Funding	\$	37,238	\$	36,456	\$	37,046	\$	37,456	
Long Term OMM Property Funding	\$	-	\$	-	\$	-	\$	-	
Total Property Funding	\$	248,252	\$	216,899	\$	236,209	\$	194,357	

Note: Balances reflect all costs and all income as of the referenced date.

ATTACHMENT 3

Scope of Work and Detailed Budget Estimate for the 2013 Annual EA Budget Authorization Request

Attachment 3 - 2013 Budget Summary Former Howard Warehouse - 2013 Budget Request

Former Howard Warehouse - 10050

Summar	y by Task		
Task De	scriptions	2013 Anr	nual Budget
Task 1	Site Assessment and Reporting	\$	-
Task 2	Soil Excavation and Reporting Final Reporting	\$	8,900
Task 3	Agency Oversight	\$	445
Totals		\$	9,345

10050 Page 1 of 2

Attachment 3 - 2013 Scope of Work and Detailed Budget Estimate Former Howard Warehouse - 2013 Budget Request

				RACER			
Task De	escription	Unit		Rate (1)	Quantity	Tot	tal Cost
Task 2	Soil Excavation and Reporting						
Prop	osed Scope for 2013						
	Conduct any remaining tasks required to clo to MDEQ comments on the NFA report	ose out project	t, incl	uding finaliz	ing the NFA rep	ort and	any followup
	Project Manager	hour	\$	139.04	20	\$	2,781
	Junior Engineer	hour	\$	90.83	50	\$	4,542
	Drafting	hour	\$	82.07	10	\$	821
	Secretary	hour	\$	51.39	10	\$	514
	Disbursements	lump sum	\$	250.00	1	\$	250
				Subto	tal (Rounded):	\$	8,900
					Task 2 Total:	\$	8,900
Task 3 Prop	Agency Oversight osed Scope for 2013 This task includes an allowance for agency	oversight, sho	uld it	be necessa	ary. Agency Ove	ersight is	3
	cacluated as 5% of the total cost for 2013.						
Ager	ncy Oversight	%	\$	8,900.00	5	\$	445
					Task 3 Total:	\$	445

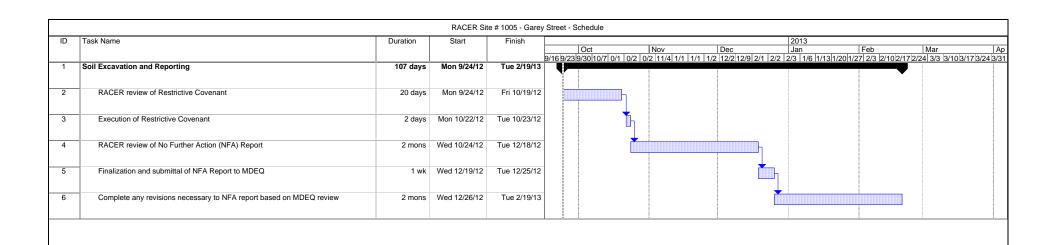
Assumptions:

(1) 2013 contract rates with RACER.

10050 Page 2 of 2

ATTACHMENT 4

Projected 2013 Schedule and Milestones



ATTACHMENT 5

Current and Future Years Cost Reallocation

Attachment 5 - Current and Future Years Cost Reallocation Former Howard Warehouse - 2013 Budget Request

Former Howard Warehouse - 10050

				Site				A
Year	Anı	nual Cost		ssessment d Reporting		I Excavation d Reporting	C	Agency Oversight
2009	\$	-	\$	-	\$	-	\$	-
2010	\$	-	\$	-	\$	-	\$	-
2011 (1)	\$	13,389	\$	13,389			\$	-
2012 - Estimated Costs (2)	\$	51,931	\$	3,523	\$	45,908	\$	2,500
2013	\$	9,345	\$	-	\$	8,900	\$	445
2014	\$	136,835	\$	58,088	\$	70,192	\$	8,555
2015	\$	-	\$	-	\$		\$	-
2016	\$	-	\$	-	\$	-	\$	-
2017	\$	-	\$	-	\$	-	\$	-
2018	\$	-	\$	-	\$		\$	-
2019	\$	-	\$	-	\$	-	\$	-
Subtotal	\$	211,500	\$	75,000	\$	125,000	\$	11,500
Subtotal from Original Cost Breakdown (3)	\$	211,500	\$	75,000	\$	125,000	\$	11,500
Variance	\$	-	\$	-	\$	-	\$	-
2020	I		\$		\$		\$	_
2021			\$		\$	-	\$	
2022			\$		\$	_	\$	
2023			\$		\$	_	\$	
2024			\$	_	\$	_	\$	_
2025			\$		\$	-	\$	_
2026			\$		\$	_	\$	_
2027			\$	_	\$	_	\$	_
2028			\$	_	\$	_	\$	_
2029			\$	_	\$	-	\$	_
2030			\$	_	\$	_	\$	_
2031			\$	_	\$		\$	_
2032			\$	_	\$	-	\$	_
2033			\$	_	\$	-	\$	-
2034			\$	_	\$	-	\$	_
2035			\$	_	\$	-	\$	-
2036			\$	-	\$	-	\$	_
2037			\$	_	\$	-	\$	_
2038			\$	_	\$	-	\$	-
Totals	\$	-	\$	-	\$	-	\$	-
Original Cost Breakdown (3)	\$	-	\$	-	\$	-	\$	-
Variance	\$	-	\$	-	\$	-	\$	-

Identifies cells/amounts that were revised from the most recent approved EA budget or budget amendment (Amendment No.1 approved on February 27, 2012)

Notes:

- (1) January 1, 2011 through December 31, 2011
- (2) 2012 estimated reflects actual spent from January through August 2012 (\$41,931) and projected spend (\$7,500) for September through December 31, 2012
- (3) The original cost breakdown and schedule of cash flow as established by MLC pursuant to the May 2010 RCES

10050 Page 1 of 1