



MEMORANDUM

18 September 2013
File No. 37147-021/022

TO: Michigan Department of Environmental Quality:
Richard Berak

C: Revitalizing Auto Communities Environmental Response Trust:
Grant Trigger

Revitalizing Auto Communities Environmental Response Trust:
David Favero

FROM: Haley & Aldrich of Michigan, Inc.
Derek C. Kaiding, P.E.

SUBJECT: Work Plan to Further Investigate UST Releases #C-0798-91 and
#C-0717-92 at the ACC Penske Property

This memorandum (hereafter referred to as Work Plan) has been prepared by Haley & Aldrich of Michigan, Inc. on behalf of Revitalizing Auto Communities Environmental Response Trust (RACER), and serves as a Work Plan to further investigate soil and groundwater at the ACC Penske Property, Site #1310 [the Site]]. These activities are proposed, pursuant to Part 213 of the Michigan Natural Resources and Environmental Protection Act (NREPA), 1994 Public Act 451, as amended (Part 213).

This Work Plan provides a brief description of Site background, a summary of prior work completed, an overview of existing conditions, and a description of work to be conducted to assess the status of open Part 213 releases #C-0798-91 and #C-0717-92, and whether these releases merit further investigation and remediation.

1. SITE LOCATION AND HISTORY

The Site consists of a total of 7.235 acres of commercially-zoned property which exist as two parcels with Oakland County Tax Assessor's identification numbers of 14-19-432-003 (1.154 acres) and 14-19-432-004 (6.081 acres) (Figures 1 and 2). Addresses for these parcels are 701 and 675 Cesar E Chavez Avenue, Pontiac MI, respectively. Two one-story buildings totaling approximately 32,000 square feet in size are located at the Site, and are currently occupied by the current Site owner, Lee Contracting (Lee).

The Site is generally flat, and the parking lots gently slope toward catch basins located in the south-central portion of the Site. Regional groundwater flow is suspected to be to the south-southeast, generally toward Crystal Lake, located approximately 2 miles south-southeast from the Site.

The Site is currently being used for truck maintenance and repair, parking, and/ vehicle/trailer storage. The surrounding area of the Site is generally characterized as commercial, industrial and residential land uses. The Site is bordered to the north by Cesar E Chavez Avenue and beyond that, numerous commercial properties including a party store, a Coney Island restaurant, a vehicle storage lot for junked cars/cars to be sold, and beyond those, a residential neighborhood. To the west of the Site is a truck repair facility (Clyde's Frame Shop). To the south, are numerous railroad tracks. To the east, the Site is bordered by North Cass Avenue. Beyond North Cass Avenue is the Illumination Lighting Company and additional property operated by Lee.

The Site first appeared in the 1957 Polk's City Directory with usage as Wilson GMC Company, and was not found in the earlier 1952 edition. On September 3, 1957, General Motors purchased the property from Wilson GMC Company, and operated the property as a sales/maintenance facility. From 1996 through 2009, Automotive Component Carrier, Inc., a division of Penske Logistics (Penske) leased the Site from General Motors, and operated a logistics company on the property. Penske operations included performing logistical services, and maintaining a transportation fleet of approximately 82 diesel tractor-trailers. Penske ceased operations at the Site in 2009. The Site was vacant until 2011, when Lee began using the Site for truck maintenance and repair operations.

2. SITE INVESTIGATIONS/ASSESSMENTS

Recent Site Investigations/Assessments

A Remediation Cost Estimate Summary (RCES) was developed for the Site (among many others) as part of the General Motors bankruptcy proceeding when the Site was controlled by Motors Liquidation Company (MLC). When the Bankruptcy Court approved the formation of RACER, the budgets adopted by MLC provided the basis for the allocation of funding for following up environmental concerns associated with the Site.

The RCES prepared for the Site (Levine-Fricke- Recon, Inc., an ARCADIS Company, October 2009 [Revised May 2010]) identified four waste oil underground storage tanks (USTs) having been located at the Site, and having been removed in 1989. This information is based on an interview with General Motors personnel. One of these USTs was reported to have had a capacity of 500 gallons, while the remaining three USTs were reported to each have had a capacity of 280 gallons. The RCES notes removal information concerning these USTs to be limited, and considered no other Recognized Environmental Concerns (RECs) associated with the Site.

Work anticipated by the RCES to be performed at the Site to address the USTs noted above included conducting a geophysics survey to determine whether the USTs are present, as well as Site characterization of soils and groundwater in and around areas that may have contained the USTs.

The *Report on ASTM Phase I Environmental Site Assessment, 675 Cesar E Chavez Avenue, Pontiac, Michigan* (Haley & Aldrich, June 2010 [DRAFT]) (Draft Phase I Assessment) identifies the following USTs associated with the property:

- Tank 1, identified by the associated Environmental Data Resources, Inc. (EDR) Report, based on Michigan Department of Environmental Quality's (MDEQ's) UST database, as a 500-gallon UST, constructed of asphalt coated or bare steel, and stated to have been removed on 20 December 1989.

- Tank Phantom, identified by the associated EDR Report, based on MDEQ's UST database, as unknown, un-registered UST, with unknown status.
- 500-gallon UST, and three 2,000-gallon USTs, based on an 8 November 1954 City of Pontiac installation permit.

Additionally, the Draft Phase I Assessment identifies, based on the EDR Report, two open Part 213 releases associated with the subject property. These releases, namely #C-0798-91 and #C-0717-92, are dated 4 April 1991 and 4 May 1992, respectively. In each case, the substance(s) released is noted to be unknown, and no Release Closed Date is noted to have been listed.

As for other noteworthy (non-UST-related) RECs associated with the Site, the Draft Phase I Assessment identifies an oil/water separator (OWS) located under the wash bay of Building 1, where all fluids entering any of the interior catch basins of the building are stored. This was investigated in September 2011, coincident with the performance of a geophysical survey, which was performed by Haley & Aldrich in connection with an August 2011 evaluation of the information covered by the RCES and the Draft Phase I Assessment, and as approved by MDEQ. As a result of this evaluation, it was recommended that RACER proceed with the geophysical survey covered by the RCES. This evaluation was reported to MDEQ via 19 August 2011 memorandum to Richard Berak, MDEQ (Haley & Aldrich, August 2011). The geophysical survey covered by the RCES was completed in September 2011, and was reported to MDEQ via 3 November 2011 letter to Richard Berak, MDEQ (Haley & Aldrich, November 2011).

To conduct the geophysical survey, Haley & Aldrich contracted with Ground Penetrating Radar Technology of Ann Arbor, Michigan (GPRT) to scan for subsurface signs of former or existing USTs beneath the Site building, using ground-penetrating radar technology. 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. No evidence of former or existing USTs was noted in the areas subject to investigation.

The inspection of the OWS, which was performed coincident with the geophysical survey discussed above, found the OWS to be constructed of concrete, with no obvious lining, and 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. Accordingly, it was noted that the OWS should no longer be considered a REC.

Based on the results of the September 2011 geophysical survey and the further evaluation of the information covered by the RCES and the Draft Phase I Assessment, a work plan was submitted to MDEQ in July 2012 to further investigate the potential presence of USTs identified above. This work plan was submitted via memorandum to Richard Berak, MDEQ (Haley & Aldrich, July 2012) (July 2012 Work Plan), and included the drilling of eight soil borings, each of which would be converted to a temporary groundwater monitoring wells. Soil and groundwater samples were proposed to be collected from these locations and subject to various laboratory analyses.

During its review of the July 2012 Work Plan, the MDEQ found numerous historical files concerning the USTs noted above as well as the associated open releases #C-0798-91 and #C-0717-92. These files, not previously known to exist, were collectively found by MDEQ at its Southeast District Offices in

Warren, Michigan and its central offices in Lansing, Michigan. A summary of the information contained in the new-found MDEQ files is provided below, with respect to each of the two open releases identified above. As follow-up, on 5 October 2012, MDEQ sent a letter to RACER (MDEQ, October 2012) indicating that there was insufficient information presented by the July 2012 Work Plan for the MDEQ to approve it, since it did not account for the new-found MDEQ files. A follow-up Work Plan was prepared and submitted to the MDEQ on 15 February 2013. On 25 April 2013, MDEQ sent a letter to RACER indicating that there was insufficient information presented by the February 2013 to approve it, and listed several items of information that were needed. Representatives from Haley & Aldrich and RACER Trust met with representatives from MDEQ on 22 May 2013 to discuss the February 2013 Work Plan and the MDEQ's April 2013 letter. This Work Plan has been prepared as a result of this meeting, and focuses only on assessing the status of open releases #C-0798-91 and #C-0717-92 under Part 213, and it supersedes the July 2012 and February 2013 Work Plans.

Prior Site Investigations/Assessments

The historical files associated with open releases #C-0798-91 and #C-0717-92 found by the MDEQ in 2012, include various forms, reports, notes, letters, and other correspondences pertaining to these open releases, covering primary the timeframe of about November 1989 through April 1993. These files do not include any information concerning the three 2,000-gallon USTs noted by the 8 November 1954 City of Pontiac installation permit, which was discovered during the preparation of the Draft Phase I Assessment.

A chronology of primary events covered by the historical files recently found by the MDEQ is provided below for each of the open releases noted above.

> Open Release #C-0798-91

- 29 November 1989: Notification of UST Removal/Closure – GMC Truck Center (GM) notifies Michigan State Police Fire Marshal Division (MFMD) of release; copy noted to have been sent to Michigan Department of Natural Resources (MDNR) on 5 December 1989.
- 29 January 1991: Letter – GM notifies MFMD that there are no longer any USTs at the Site, and requests that they discontinue mailing invoices for used oil charges.
- 2 February 1991: Form Letter – MFMD notifies GM that it has not received a Site Assessment Report pertaining to the 29 November 1989 closure notice, or an amended registration form for the Site.
- 17 April 1991: Form Letter – MFMD notifies GM test methodology and level of detection of the methodology are inadequate, and that contaminant concentrations are greater than threshold detection limits and there is evidence of release.
- 23 April 1991: Notification of Suspected/Confirmed Release – MFMD notifies GM and MDNR of confirmed release due to "...site assessment showed contamination..."
- 7 May 1991: Letter – MDNR acknowledges to GM its receipt of the confirmed release notice from MFMD, and outlines follow-up requirements.

- 13 May 1991: Letter – GM responds to MDNR’s letter of 7 May 1991, making the following points:
 - o Believed that MFMD concluded a confirmed release based on only one soil sample result exceeding guidance criteria (TPH) for total petroleum hydrocarbons.
 - o Confirmed release does not exist based on the following:
 - Tank and associated piping noted in good condition during removal.
 - No evidence of discolored soil, nor any noticeable odors, were noted during excavation.
 - TPH criteria exceeded represented guidance for use at sites of a confirmed release.
 - o Believed that MFMD concluded a confirmed release based on only one soil sample result exceeding guidance criteria for total petroleum hydrocarbons.
- 7 June 1991: Letter – GM re-asserts to MDNR that it does not believe that a confirmed release exists, and further notes that it does not feel that the soil represented by the elevated TPH poses any risk to human health. GM further states that it will further review its applicable “... (i.e., closure file)...” for any pertinent information.
- 7 October 1991: Letter – GM notifies MDNR that it failed to turn-up any further pertinent information concerning a possible release, and that notwithstanding the absence of any information to document a release, they agree to address the condition as a confirmed release. This letter also transmits a Site Characterization Report and a Site Investigation Work Plan.
- 22 November 1991: Letter – GM transmits to MDNR a revised Site Investigation Work Plan.
- 2 April 1992: Letter – GM transmits to MDNR a 10 March 1992 report by ENKON Environmental Services, Inc. of Livonia, Michigan (ENKON) – *Subsurface Soils Investigation, GMC Truck Center, 675 Oakland, Pontiac, Michigan*. Report presents results of the 22 November 1991 revised Site Investigation Work Plan.
- 18 December 1992: Letter – MDNR acknowledges/approves the 22 November 1991 Site Investigation Work Plan.
- 26 April 1993: Letter – GM notes to MDNR that the 22 November 1991 Site Investigation Work Plan activities are completed, and that a Closure Report will be submitted to MDNR by 1 September 1993.
- No further GM/agency correspondence until July 2005, when MDEQ inquires about the status of the release and GM notes that no associated documents can be located.

> Open Release #C-0717-92

- 4 May 1992: Suspected/Confirmed Release – GM notifies MFMD of release; copy noted to have been sent to MDNR same date.
- 11 May 1992: Letter – MDNR acknowledges to GM the release notice from MFMD, and outlines to GM follow-up requirements.

- 21 May 1992: Letter – GM submits information required as part of Initial Abatement (20-day submittal) reporting, including the soil analytical data for one of four soil boings drilled during closure activities. These data indicate the presence of PNAs in soil at this location.
- 16 June 1992: Letter – GM submits the following to MDNR:
 - o Site Characterization Report.
 - o Site Investigation Work Plan.
 - o Initial Abatement Report.
 - o Release Notification.
- 8 September 1992: Letter – GM notifies MFMD tanks to be removed on 14 September 1992.
- 9 September 1992: Letter – MFMD acknowledges/approves GM’s removal notice and outlines associated requirements.
- 18 December 1992: Letter – MDNR approves GM’s 16 June 1992 Site Characterization Report and Site Investigation Work Plan, and outlines associated follow-up requirements.
- 26 April 1993: Letter – GM notes to MDNR that the 16 June 1992 Site Investigation Work Plan activities are completed, and that a Closure Report will be submitted to MDNR by 1 September 1993.
- No further GM/agency correspondence until July 2005, when MDEQ inquires about the status of the release and GM notes that no associated documents can be located.

3. EVALUATION OF SITE ENVIRONMENTAL DATA

Considerable information is now available pertaining to open releases #C-0798-91 and #C-0717-92. The tanks in each case have been removed, as explicitly noted by the available documentation, and this is further supported by the results of RACER’s September 2011 geophysical survey. A more detailed review/evaluation of the analytical data contained in the records summarized in Section 2 is provided below with respect to each of the these open releases, and with respect to the current applicable Non-Residential Generic Cleanup Criteria and Screening Levels of Part 201 of the Michigan Natural Resources and Environmental Protection Act, 1994 Public Act 451 (Part 201), dated 28 September 2012 (Part 201 Criteria).

Open Release #C-0798-91

As part of the 22 November 1991 Site Characterization Work Plan, six soil borings were drilled at the boundaries of the UST excavation area associated with this release, and soil samples were collected to represent sidewall samples along each side of the excavation cavity (four samples, each collected at 5 feet bgs; mid-depth of excavation) and the floor of the excavation cavity (two samples, each at 12 feet bgs). Each sample was analyzed for: Benzene, Toluene, Ethylbenzene, and Xylene (BTEX), polynuclear aromatics (PNAs), polychlorinated biphenyls (PCBs), lead, cadmium, and chromium.

The results of these analyses indicated the presence of the following constituents and concentrations:

Constituent	Location and Concentration (parts per billion, ppb)					
	SS#1 (Northeast Wall)	SS#2 (Floor West)	SS#3 (Floor East)	SS#4 (Southeast Wall)	SS#5 (Northeast Wall)	SS#6 (Southwest Wall)
Naphthalene	Not Detected	Not Detected	Not Detected	930	Not Detected	
Fluorene	Not Detected	Not Detected	Not Detected	Not Detected	Not Detected	630
Phenanthrene	Not Detected	Not Detected	Not Detected	370	Not Detected	1670
Fluoranthene	530	Not Detected	Not Detected	2100	1000	7090
Pyrene	530	Not Detected	Not Detected	1170	730	6130
Chrysene	Not Detected	Not Detected	Not Detected	770	Not Detected	5260
Benzo(b)fluoranthene	370	Not Detected	Not Detected	3030	1130	14490
Benzo(k)fluoranthene	Not Detected	Not Detected	Not Detected	1830	Not Detected	15950
Benzo(a)pyrene	Not Detected	Not Detected	Not Detected	2000	Not Detected	21250
Dibenzo(a,h)anthracene	1730	Not Detected	Not Detected	Not Detected	Not Detected	21580
Benzo(g,h,i)perylene	3730	Not Detected	Not Detected	3600	7460	25070
Indeno(1,2,3-cd)pyrene	1900	Not Detected	Not Detected	1700	1470	10020
Aroclor 1254	Not Detected	Not Detected	Not Detected	Not Detected	Not Detected	1330
Cadmium	9305	150	26	5730	39	34
Chromium	1205	588	2566	101650	12350	6430
Lead	8135	1361	3275	680000	59700	6170

The following Part 201 Criteria have been compared to the data summarized above:

- Part 201 Nonresidential Drinking Water Protection Criteria (NRDWP);
- Part 201 Nonresidential Volatilization to Indoor Air Inhalation Criteria (NVIAD);
- Part 201 Nonresidential Direct Contact Criteria (NRDC); and
- Acute Inhalation Levels (AILs).

This comparison indicates the following Part 201 Criteria exceedances:

Constituent	Location and Concentration (parts per billion, ppb)				Part 201 Criteria Exceeded
	SS#1 (Northeast Wall)	SS#4 (Southeast Wall)	SS#5 (Northeast Wall)	SS#6 (Southwest Wall)	
Benzo(a)pyrene	—	—	—	21250	NRDC (8000 ppb)
Dibenzo(a,h)anthracene	—	—	—	21580	NRDC (8000 ppb)
Cadmium (total)	9305	—	—	—	NRDWP (6000 ppb)
Chromium (total)	—	101650	—	—	NRDWP (30000 ppb – Hexavalent Chromium)

Despite that sample SS#1 exhibited a concentration of cadmium exceeding the Part 201 NRDWP criterion, it is rather obvious that this condition does not represent soil associated with the subject release, as this location did not exhibit the presence of any of the PNA's detected in the other three samples (SS#4, SS#5, and SS#6), which are likely associated with the waste oil previously contained in the tank removed from this location. It is also important to note that the Part 201 Criterion associated with chromium represents hexavalent chromium, and the chromium data presented in the 10 March 1992 ENKON Report represent total chromium.

GM's 2 April 1992 letter to MDNR transmitting the 10 March 1992 ENKON Report indicated that soil along all four sides of the prior excavation cavity would be further excavated to follow up the detection

of PNAs summarized above, and that additional verification sampling and analyses would be performed following such excavations. Although GM's 26 April 1993 follow-up letter to MDNR implies that this work was completed, no documentation related to this additional excavation work has been found.

Open Release #C-0717-92

GM's 16 June 1992 Site Characterization Report submitted to MDNR concerning this release noted that one of four soil samples collected and analyzed prior to the excavation of the three associated USTs exhibited the presence of various PNAs. Specifically, the soil sample SS#3, collected immediately northeast of the tanks, exhibited the following PNAs:

Constituent	Concentration (parts per billion, ppb)
Fluoranthene	700
Pyrene	390
Benzo(b)fluoranthene	750
Benzo(k)fluoranthene	950
Benzo(a)pyrene	1400
Dibenzo(a,h)anthracene	1780
Indeno(1,2,3-cd)pyrene	640

Comparing these data to the Part 201 Criteria listed above concerning Open Release #C-0798-91 indicates no exceedances.

Considering that select concentrations listed above did exceed certain applicable criteria in 1992 (former MI Act 307 Type B Criteria), GM's 16 June 1992 Site Investigation Work Plan indicated that the three USTs associated with this release would be excavated along with the soil represented by the data listed above. It was further noted that verification soil samples would be collected from the base of the excavation and from along the northeast wall of the excavation, and that these samples would be analyzed for BTEX and select PNAs.

Although GM's 26 April 1993 follow-up letter to MDNR implies that this work was completed, no documentation related to this additional excavation work has been found.

4. PROPOSED WORK PLAN

As noted above, the historical records for open releases #C-0798-91 and #C-0717-92 indicate that all associated USTs have been removed, and the results of the 2011 geophysical survey supported this claim. The historical records for these releases also indicate that the contaminated media associated with these releases have been addressed through soil excavation and off-site disposal; however, follow-up records have not been found to confirm these claims. As such, in order to assess the current status of conditions associated with these releases and the potential presence of remaining residual contamination in soil and/or groundwater, a total of 14 soil borings are proposed to be drilled as at the locations illustrated on Figure 3. Several of these borings are positioned to facilitate the assessment of native soil outside of the former UST excavation cavities. If backfill soil is encountered during the drilling of any borings drilled along the perimeters of the former excavation cavities, drilling will be terminated at that location and a step-out boring will be drilled (up to six step-out borings have been assumed). Each of the proposed soil borings will be drilled using Geoprobe® techniques to a depth of 20 feet below the

ground surface, or about 5 feet into saturated materials, whichever is shallower. The soil cores recovered from these borings will be segmented in 2-foot depth intervals, with each of these depth intervals being logged according to Unified Soil Classification System and screened in the field using a photoionization detector (PID). Up to 36 soil samples from these borings will be submitted for laboratory analyses. These samples will be selected with bias toward any obvious evidence of release (e.g., visual evidence of gross contamination and/or relatively high PID readings) noted at the time of sample collection. If no obvious evidence of release is noted, the following samples will be selected for laboratory analyses:

Soil Boring/ Monitoring Well ID.	Depth Interval (bgs)
Open Release #C-0798-91	
2013-91-1	4 to 6 feet, 6 to 8 feet, 8 to 10 feet, 10 to 12 feet, and one from the smear zone, if present
2013-91-2	
2013-91-3	
2013-91-4	
2013-91-5	
2013-91-6	10 to 12 feet
Open Release #C-0717-92	
2013-92-1	4 to 6 feet, 6 to 8 feet, 8 to 10 feet, 10 to 12 feet, and one from the smear zone, if present
2013-92-2	
2013-92-3	
2013-92-4	
2013-92-5	
2013-92-6	10 to 12 feet
2013-92-7	
2013-OFB-1	4 to 6 feet, 6 to 8 feet, 8 to 10 feet, 10 to 12 feet, and one from the smear zone, if present

Soil samples subject to laboratory analyses will be submitted to Merit Laboratories, Inc. of East Lansing, Michigan (Merit) for the following analyses:

- Target Compound List (TCL) volatile organic compounds (VOCs);
- TCL polycyclic aromatic hydrocarbons (PAHs);
- TCL polychlorinated biphenyls (PCBs); and
- Select metals (total), namely: Cadmium, Chromium, and Lead.

If groundwater is encountered in these borings, and they are found to contain a measurable amount of groundwater, a subset will be converted to temporary (1.5-inch diameter) monitoring wells (pre-packed screen and riser installation, but no surface mount, or protective casing) to facilitate groundwater sampling (six wells assumed). Groundwater will be collected from each of these temporary monitoring wells, and will be analyzed as noted below. It should be noted that the analyses for metals will be conducted on samples of both filtered and unfiltered. Groundwater elevation measurements will be collected from each temporary monitoring well at the time of sampling. Groundwater samples will be collected as grab samples, using a peristaltic pump. These samples will be submitted to Merit for the following analyses:

- TCL VOCs;
- TCL PAHs; and
- Select metals (total), namely: Cadmium, Chromium, and Lead.

Groundwater samples (if any) will also be analyzed for the following parameters in the field:

- Dissolved Oxygen;
- Oxidation-reduction potential;
- Alkalinity/acidity (pH);
- Temperature;
- Conductivity; and
- Turbidity.

All laboratory analyses will be performed using standard methods as prescribed by United States Environmental Protection Agency publication SW-846, entitled Test Methods for Evaluating Solid Waste, Physical/Chemical Methods.

The following quality assurance/quality control samples will be analyzed:

Soil	
VOCs	Two each of the following: ■ Field duplicates; ■ Matrix spikes; and ■ Matrix spike duplicates
PAHs	
metals	
PCBs	
Water	
VOCs	One trip blank and two each of the following: ■ Field duplicates; ■ Matrix spikes; and ■ Matrix spike duplicates.
PAHs	Two each of the following: ■ Field duplicates; ■ Matrix spikes; and ■ Matrix spike duplicates.
Metals	

All sampling equipment will be thoroughly decontaminated between sample locations to reduce the potential for cross-contamination. Decontamination will consist of thoroughly washing the sampling equipment in an Alconox and distilled water wash followed by a distilled water rinse and/or by high-pressure steam cleaning. Samples will be placed in the appropriate containers and stored in a cooler containing ice for preservation prior to submittal to the analytical laboratory. Standard chain-of-custody procedures will be followed. The soil removed during boring installation will be temporarily staged on site in buckets pending laboratory results prior to being disposed off-site. Used personal protective equipment will be disposed with general refuse with no special handling.

5. REPORTING

Once the analytical data discussed in Section 4 has been validated, these data will be tabulated and screened against the following Part 201 Criteria:

- Part 201 NRDWP;
- Part 201 NVIAI;
- Part 201 NRDC; and
- Acute Inhalation Levels (AILs).

The results of this screening will be summarized in a brief report which will also summarize the activities performed and recommendations for follow-up activities.

6. SCHEDULE

The field work will begin within approximately 4 weeks of approval of this Work Plan from the MDEQ, pending weather conditions. It is anticipated that a summary of the data collected would be distributed along with proposed follow-up action within approximately 8 weeks of the initiation of field work.

7. PRIMARY REFERENCES

- ENKON Environmental Services, Inc., March 1992, *Subsurface Soils Investigation, GMC Truck Center, 675 Oakland, Pontiac, Michigan.*
- General Motors Corporation Truck & Bus Group, June 1992, *Site Characterization Report, GM Truck Platforms - Pontiac Truck Center.*
- Haley & Aldrich of Michigan, Inc., February 2013, Letter to Richard Berak, MDEQ, Subject: *Work Plan to Further Investigate Potential Releases at the ACC Penske Property, Site #1310.*
- Haley & Aldrich of Michigan, Inc., July 2012, Letter to Richard Berak, MDEQ, Subject: *Work Plan to Further Investigate Potential UST Releases at 675 Oakland Avenue, Pontiac, MI, a.k.a 675 Cesar E Chavez Avenue, Pontiac, Michigan or ACC Penske Property, Site #1310.*
- Haley & Aldrich of Michigan, Inc., November 2011, Letter to Richard Berak, MDEQ, 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.*
- Haley & Aldrich, Inc., June 2010 (DRAFT), *Report on ASTM Phase I Environmental Site Assessment, 675 Cesar E Chavez Avenue, Pontiac, Michigan.*
- Levine-Fricke- Recon, Inc., an ARCADIS Company, October 2009 (Revised May 2010), *Remediation Cost Estimate Summary, ACC Penske – 675 Oakland Avenue, Pontiac, Michigan, MLC ID 1310.*
- Michigan Department of Environmental Quality, April 2013, Letter to David Favero, RACER, Subject: *Work Plan, ACC Penske Site, 675 and 701 Cesar E Chaves Avenue, Pontiac, Oakland County, Michigan, Facility ID No. 00011332.*
- Michigan Department of Environmental Quality, October 2012, Letter to David Favero, RACER, Subject: *Notice of Insufficient Information in the Response Activity Plan for the ACC Penske Site, 675 Cesar E. Chavez Avenue Pontiac, Oakland County, Michigan Facility ID No. 00011332.*

RACER Trust/MDEQ

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Attachments:

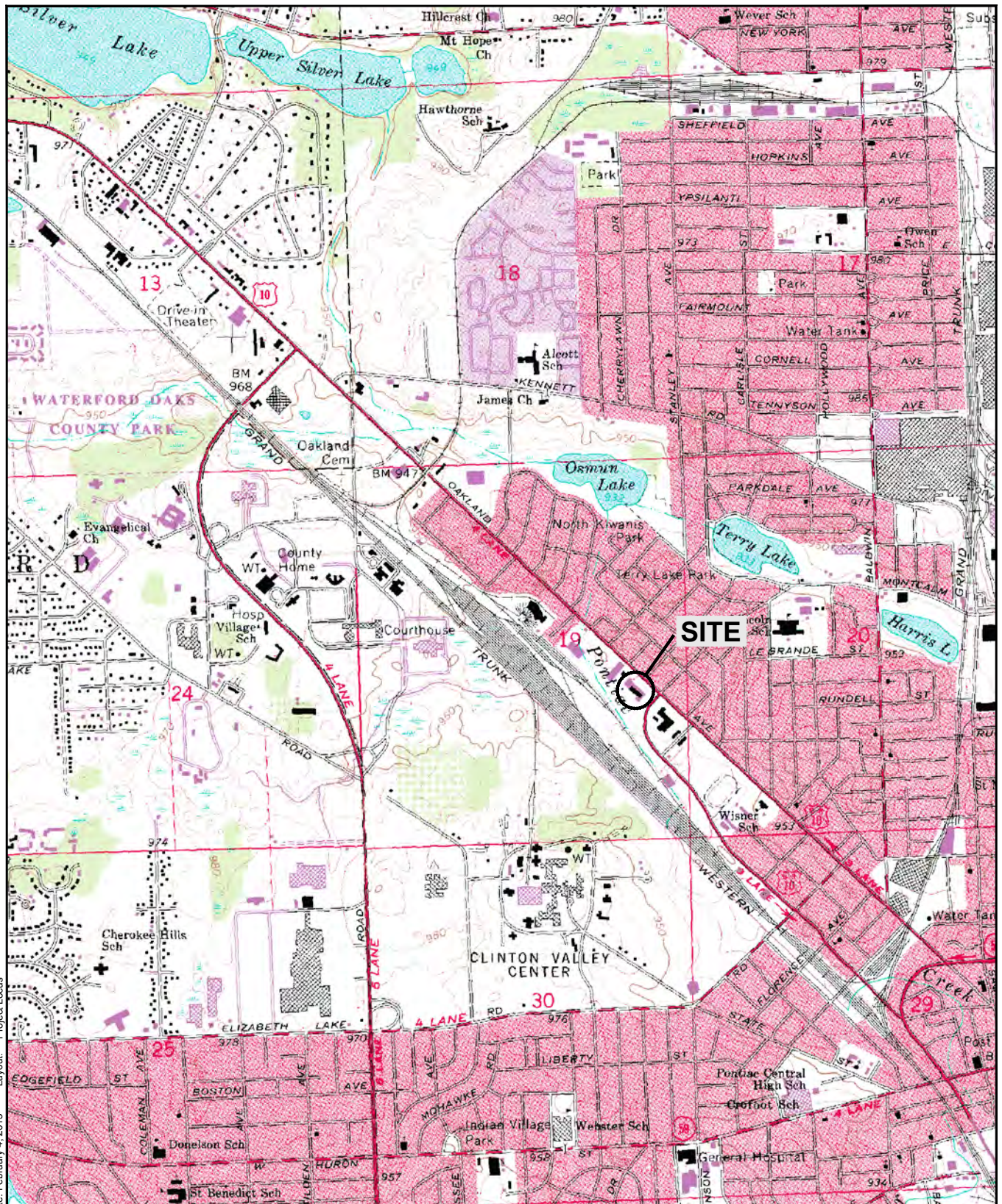
Figure 1 – Project Locus

Figure 2 – Site Plan

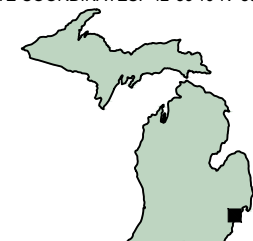
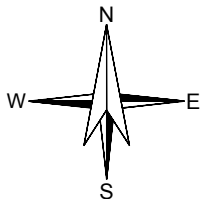
Figure 3 – Proposed Soil Boring/Monitoring Well Locations

Drawing Name: G:\37147 -ACC Penske\015\CAD\37147-015\01.dwg
 Operator Name: LUCDO, SAM
 Plot Date: February 4, 2013

Layout: Project Locus



SITE COORDINATES: 42°39'10"N 83°18'44"W



U.S.G.S. QUADRANGLE: PONTIAC, MI.

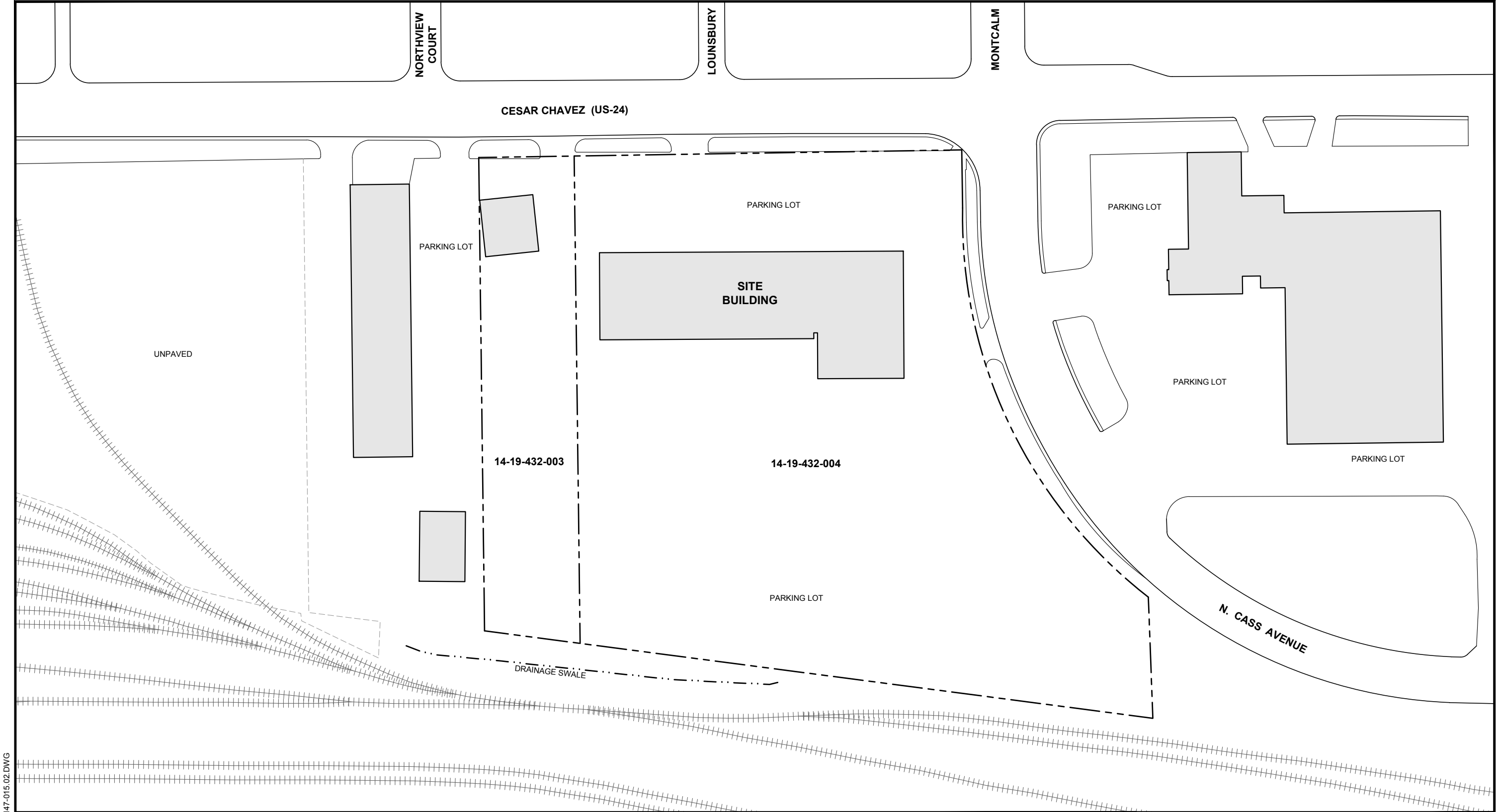
HALEY & ALDRICH

ACC-PENSKE
 675 CESAR CHAVEZ
 PONTIAC, MICHIGAN

PROJECT LOCUS

SCALE: 1:24000
 FEBRUARY 2013

FIGURE 1



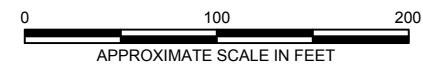
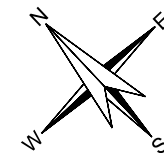
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LEGEND

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

NOTES

- 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

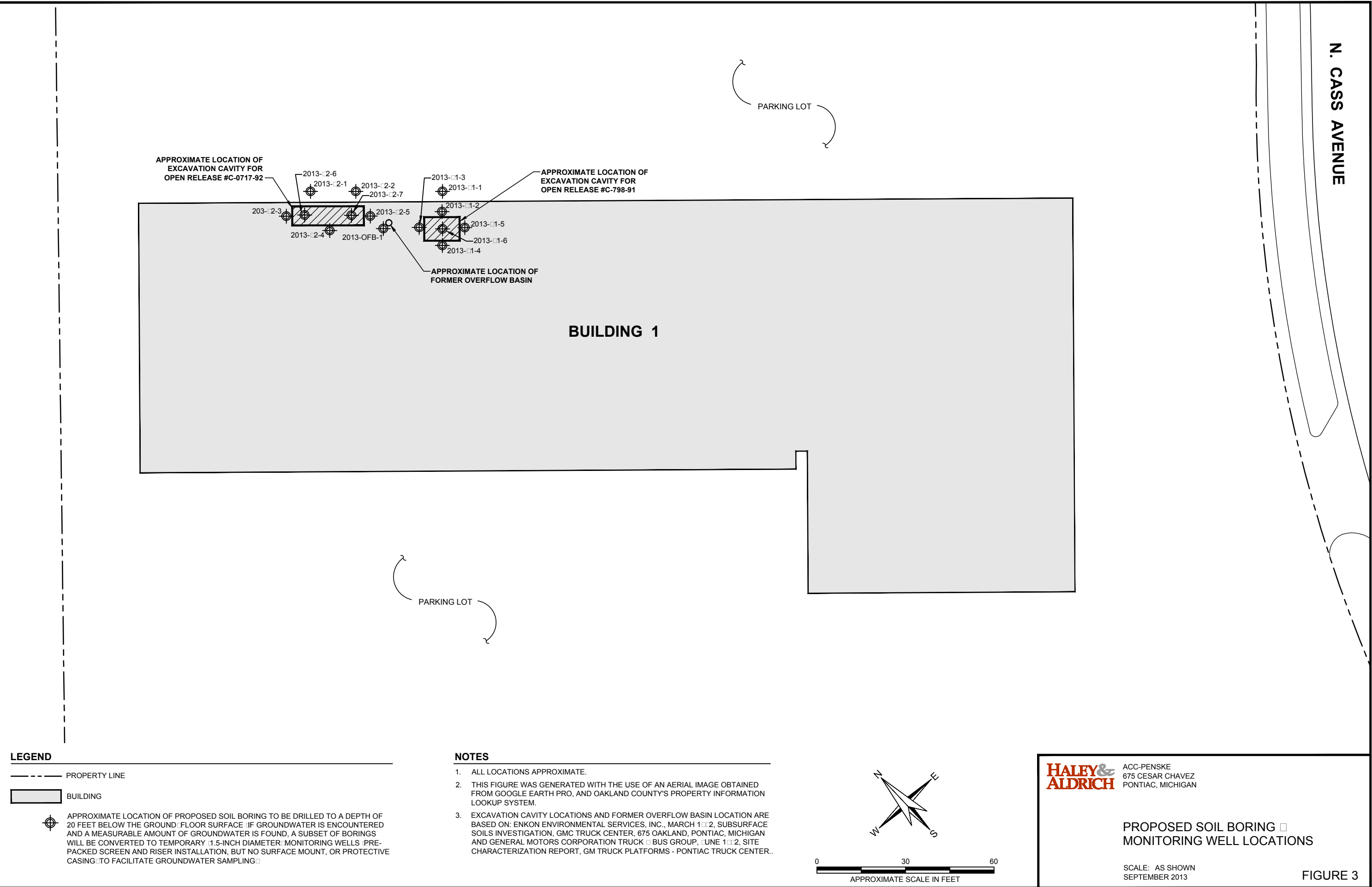
ACC-PENSKE
675 CESAR CHAVEZ
PONTIAC, MICHIGAN

SITE PLAN

SCALE: AS SHOWN
FEBRUARY 2013

FIGURE 2

\\DTR\COMMON\37147 - ACC PENSKE\015\CAD\37147-015.05.DWG



N. CASS AVENUE

PARKING LOT

APPROXIMATE LOCATION OF EXCAVATION CAVITY FOR OPEN RELEASE #C-0717-92

APPROXIMATE LOCATION OF EXCAVATION CAVITY FOR OPEN RELEASE #C-798-91

APPROXIMATE LOCATION OF FORMER OVERFLOW BASIN

BUILDING 1

PARKING LOT

HALEY & ALDRICH

ACC-PENSKE
675 CESAR CHAVEZ
PONTIAC, MICHIGAN



0 30 60
APPROXIMATE SCALE IN FEET