



Environmental Resources Group

Assessment • Remediation • Compliance • Risk Management

NO FURTHER ACTION REPORT

RACER TRUST
DAVISON ROAD INDUSTRIAL LAND (12920)
DAVISON AND DONEGAL ROAD
FACILITY ID 25000447
BURTON, MICHIGAN

PREPARED FOR:

RACER TRUST
500 WOODWARD AVENUE, SUITE 2650
DETROIT, MICHIGAN 48226

PREPARED BY:

ENVIRONMENTAL RESOURCES GROUP, LLC
28003 CENTER OAKS COURT, SUITE 106
WIXOM, MI 48393
248-773-7986
ERG PROJECT NO.: 1119.001
MAY 4, 2017



Request for DEQ Review of No Further Action (NFA) Report

This form is required for submittal of a request for the DEQ to review a No Further Action Report, under Section 20114d, Part 201, Environmental Remediation, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended.

Section A: NFA Category (Check all that apply:)

Residential	☐	Unrestricted	☐
Non-Residential	☒	Restricted	☒
20b(3) Site Specific or Surrogate (no generic criteria available)	☐	20b(2) Site Specific (modification of generic criteria)	☐

The NFA addresses the entire facility
(entire facility as defined by Part 201, all releases, hazardous substances, and environmental media): ☐

The NFA does not address the entire facility ☒
Please specify the release(s), hazardous substance(s), environmental media, and/or portions of the facility addressed by the NFA.

This NFA Report addresses the entire facility, all releases, hazardous substances, and environmental media except for arsenic for the GSI pathway.

NFA relies on a De minimus determination of GSI impact pursuant to Section 20120e(14): ☐

Section B: Facility Information:

Facility Name: Davison Road Industrial Land	County: Genesee
Street Address of Property: Davison Road and Donegal Street	City/Village/Township: Burton
City: Burton State: MI Zip: 48509	Town: 7N Range: 7E Section: 10
Property Tax ID (include all applicable IDs addressed by the NFA) 59-10-100-030 (0.575 Acres) 59-10-100-031 (55.63 Acres)	Quarter: SW Quarter-Quarter NW
Status of submitter relative to the property (check all that apply): Former Current Prospective	Decimal Degrees Latitude: 43.029135 Decimal Degrees Longitude: -83.628085
Owner ☐ ☐ ☐	Reference point for latitude and longitude: Center of site ☒ Main/front door ☐ Front gate/main entrance ☐ Other ☐
Operator ☐ ☒ ☐	Collection method: Survey ☐ GPS ☐ Interpolation ☒

Section C: Submitter Information:

Entity/person requesting review: RACER Trust	
Contact Person (name and title): David Favero, MI - Deputy Cleanup Manager	
Submitter's Address: 500 S. Woodward Ave., Ste 2650 City: Detroit State: MI Zip: 48226	
Telephone: 734.879.9525 E-Mail: dfavero@racertrust.org	
Relationship of Contact Person to the Submitter: MI Deputy Cleanup Manager	
Owner Name, if different from Submitter:	Company: RACER Properties LLC
Owner Address: 500 S. Woodward, Ste 2650	City: Detroit State: MI Zip: 48226
Telephone: 313-486-2908	E-Mail:

Section D: Facility/Property Subject to (Check all that apply):

Facility regulated under Part 201, source other than listed below or source unknown Part 201 Site ID, if known: 25000447	☒
Leaking Underground Storage Tank regulated pursuant to Part 213. Part 211/213 Facility ID, if known:	☐
Oil or gas production and development regulated pursuant to Part 615 or 625	☐
Licensed landfill regulated pursuant to Part 115	☐
Licensed hazardous waste treatment, storage, or disposal facility regulated pursuant to Part 111	☐
Consent Agreement or other legal agreement with the MDEQ	☒

Section E: Are/were the following present at the facility (Check all that apply):

	Current	Previously	Unknown
Mobil or migrating non aqueous phase liquids (NAPL)	☐	☐	☐
Soil contamination above residential criteria	☒	☐	☐
Soil contamination above non-residential criteria	☒	☐	☐
Soil aesthetic impacts	☐	☐	☐
Groundwater contamination above residential criteria	☒	☐	☐
Groundwater contamination above non-residential criteria	☒	☐	☐
Groundwater aesthetic impacts	☐	☐	☐
Soil Gas contamination above residential vapor intrusion (VI) screening levels	☐	☐	☐
Soil Gas contamination above non-residential VI screening levels	☐	☐	☐
Conditions immediately dangerous to life or health (IDLH)	☐	☐	☐
Fire & Explosion hazards related to releases	☐	☐	☐
Contamination existing in drinking water supply	☐	☐	☐
Imminent threat to drinking water supply	☐	☐	☐
Impact to surface water	☐	☐	☐
Impact to surface water sediments above screening levels	☐	☐	☐

Section F: The following questions assist MDEQ in evaluating the No Further Action Report:**Have other plans or reports, BEAs, DDCCs, NFAs, etc. been submitted for this facility?**

Facility Name, if different than this submittal:

Date and Name of most recent submittal: All groundwater monitoring data is included in the NFA, Soil Direct Contact Exceedance Delineation Report-January 14, 2016, Direct Contact Exceedance Excavation Work Plan-February 24, 2016, Direct Contact Remedial Soil Excavation Summary-August 16, 2016, Mixing Zone Request-December 22, 2015

Response Activities or Remedial Action that have been implemented (Check all that apply):

	Current	Previously
Excavation	☐	☒
Physical or Engineered Exposure Barrier	☐	☐
Active Soil Remediation System	☐	☐
In-situ Soil Remediation	☐	☐
Active Groundwater Remediation System	☐	☐
In-situ Groundwater Remediation	☐	☐
Groundwater Monitored Natural Attenuation	☐	☐
Containment, Physical or Hydraulic	☐	☐
Vapor Intrusion Barrier	☐	☐
Vapor Intrusion Remediation System	☐	☐
Other, Specify:		

Remedial Action Relies on (Check all that apply):

Mixing Zone	☐
Part 201 Section 20118(4) and (5)	☐
MIOSHA demonstration (Section 20120a(18))	☐
Restrictive Covenant	☒
Institutional Control (Section 20121(8))	☒
Alternative Instruments (Section 20121(9))	☐

Post Closure Plan and Components:Post Closure Plan Required? Yes ☒ No (Residential, Unrestricted Category Only) ☐

Plan Includes:

Permanent Markers ☐Restrictive Covenant ☒Other Institutional Controls ☐**Post Closure Agreement and Components:**Post Closure Agreement Required? Yes ☐ No ☒

Agreement Includes:

FAM ☐FAM, de minimus ☐Waiver of Permanent Marker ☐**Section G: Attachments (Required):**

Yes

Environmental Professional's Affidavit is attached: ☒Environmental Professional's Certificate of Insurance is attached: ☒Submitter's Affidavit is attached: ☒**Section H: Environmental Professional Signature:***With my signature below, I certify that this report and all related materials are true, accurate, and complete to the best of my knowledge and belief.*Signature: Susan Graves Date: May 2, 2017

Printed Name: Susan Graves

Company: Environmental Resources Group, LLC

Mailing Address: 28003 Center Oaks Ct, Ste. 106 City: Wixom State: MI Zip: 48393

Telephone: 248.773.7986 E-mail: Sue.Graves@ergrp.net

Section I: Submitter Signature:*With my signature below, I certify that this report and all related materials are true, accurate, and complete to the best of my knowledge and belief and I am legally authorized to sign for the submitter.*Signature: David Favero Date: May 1, 2017

(Person legally authorized to bind the legal entity)

Printed Name: David Favero

Title and Relationship of signatory to submitter: RACER Trust-Deputy Cleanup Manager

Address: 500 Woodward Avenue, Suite 2650 City: Detroit State: MI Zip: 48226

Telephone: 734.879.9525 E-Mail: dfavero@racertrust.org

This form and the No Further Action Report should be submitted to the DEQ Remediation and Redevelopment Division District Office unless the response activity is related to a facility that is regulated by another DEQ Division. A district map is located at www.michigan.gov/deqrrd. If regulated by another division, contact should be made with that division for information on where to submit the form and report.

Affidavit of Person Submitting a No Further Action Report

Required pursuant to Section 20114d(5) of Part 201, Environmental Remediation, of the Natural Resources and Environmental Protection Act (NEREPA), 1994 PA 451, as amended, to be submitted by a person submitting a No Further action (NFA) report to Michigan DEQ. All terms found in this document which are defined in Part 3, Definitions, and Part 201, Environmental Remediation, of NREPA shall have the same meaning as in the statute.

State of **Michigan**

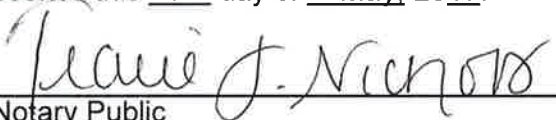
County of **Wayne**

1. I, David Favero, Michigan Deputy Cleanup Manager am authorized to submit this affidavit on behalf of RACER Trust under MCL 324.20114d(5).
2. A No Further Action (NFA) report dated May 4, 2017 is being submitted for the facility referred to as Davison Road Industrial Land and located at Davison and Donegal Road in Burton, MI (the "Facility.")
3. The purpose of the NFA report is to detail the completion of remedial action at the Facility, and includes a Declaration of Restrictive Covenant recorded with the Genesee County Register of Deeds.
4. The remedial action at the Facility described in the NFA report was conducted in compliance with all applicable local, state, and federal laws and regulations.
5. I affirm to the best of my knowledge and belief that the NFA report prepared for this Facility, and all information, data, documents and reports relied upon for this NFA report, are true, accurate and complete.



Signature of Affiant

Sworn to before me and subscribed in my presence this 1st day of May, 2017.



Notary Public

TRACIE L. NICHOLS
Notary Public, State of Michigan
County Of Wayne
My Commission Expires 03-19-2023
Acting in the County of Wayne

Environmental Consultant Affidavit for No Further Action Report

Required pursuant to Section 20114d(5) of Part 201, Environmental Remediation, of the Natural Resources and Environmental Protection Act (NEREPA), 1994 PA 451, as amended, for the Environmental Consultant who prepared a No Further Action (NFA) report that is being submitted to Michigan DEQ. All terms found in this document which are defined in Part 3, Definitions, and Part 201, Environmental Remediation, of NREPA shall have the same meaning as in the statute.

State of Michigan

County of Oakland

1. I, Susan Graves, am an Environmental Consultant whose title is, Senior Project Manager, and I am employed by Environmental Resources Group, LLC.
2. I meet the professional qualifications set forth in MCL 324.20114e(2) of NREPA. A description of my qualifications, including education and work experience, is attached.
3. I have prepared a No Further Action (NFA) report dated May 4, 2017 for the facility referred to as Davison Road Industrial Land and located at Davison and Donegal Road in Burton, MI (the "Facility.")
59-10-100-030 (0.575 Acres)
59-10-100-031 (55.63 Acres)
I am submitting this affidavit pursuant to MCL 324.20114d(5).
4. I prepared the NFA Report at the request of RACER Trust - David Favero, MI - Deputy Cleanup Manager: 500 S. Woodward Ave., Ste 2650, Detroit, MI 48226
5. The remedial action at the Facility described in the NFA report was conducted in compliance with Part 201 of the NREPA, and all other applicable local, state, and federal laws and regulations.
6. I affirm to the best of my knowledge and belief that the NFA report prepared for this Facility, and all information, data, documents and reports relied upon for this NFA report, are true, accurate and complete.



Signature of Affiant

Sworn to before me and subscribed in my presence this 4 day of May, 2017

MARCIA A. WYSOCKI
Notary Public, Macomb County, Michigan
Acting in OAKLAND County
My Commission Expires: 04/14/2018



Notary Public



CERTIFICATE OF LIABILITY INSURANCE

DATE (MM/DD/YYYY)
8/19/2016

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AFFIRMATIVELY OR NEGATIVELY AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW. THIS CERTIFICATE OF INSURANCE DOES NOT CONSTITUTE A CONTRACT BETWEEN THE ISSUING INSURER(S), AUTHORIZED REPRESENTATIVE OR PRODUCER, AND THE CERTIFICATE HOLDER.

IMPORTANT: If the certificate holder is an ADDITIONAL INSURED, the policy(ies) must be endorsed. If SUBROGATION IS WAIVED, subject to the terms and conditions of the policy, certain policies may require an endorsement. A statement on this certificate does not confer rights to the certificate holder in lieu of such endorsement(s).

PRODUCER **Eric Moore**
Moore Insurance Services, Inc.
67 N. Howell
P.O. Box 207
Hillsdale MI 49242

CONTACT NAME: **Cyndi Armstrong**
PHONE (A/C No. Ext): **(517) 439-9345** FAX (A/C No.): **(517) 439-5536**
E-MAIL ADDRESS: **info@mooreinsuranceservices.com**

INSURER(S) AFFORDING COVERAGE	NAIC #
INSURER A :CNA	
INSURER B :Home-Owners	
INSURER C :Liberty International	
INSURER D :	
INSURER E :	
INSURER F :	

INSURED
Environmental Resources Group, LLC
28003 Center Oaks Court
Suite 106
Wixom MI 48393

COVERAGESCERTIFICATE NUMBER: **CL1681901416**

REVISION NUMBER:

THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

INSR LTR	TYPE OF INSURANCE	ADDL INSR	SUBR WVD	POLICY NUMBER	POLICY EFF (MM/DD/YYYY)	POLICY EXP (MM/DD/YYYY)	LIMITS
A	GENERAL LIABILITY			4017690971	09/01/2016	09/01/2017	EACH OCCURRENCE \$ 1,000,000
	☒ COMMERCIAL GENERAL LIABILITY						DAMAGE TO RENTED PREMISES (Ea occurrence) \$ 300,000
	☐ CLAIMS-MADE ☒ OCCUR						MED EXP (Any one person) \$ 10,000
							PERSONAL & ADV INJURY \$ 1,000,000
							GENERAL AGGREGATE \$ 2,000,000
	GEN'L AGGREGATE LIMIT APPLIES PER:						PRODUCTS - COMP/OP AGG \$ 2,000,000
	☐ POLICY ☒ PRO-JECT ☐ LOC						\$
B	AUTOMOBILE LIABILITY			5046483000	09/01/2016	09/01/2017	COMBINED SINGLE LIMIT (Ea accident) \$ 1,000,000
	☐ ANY AUTO						BODILY INJURY (Per person) \$
	☒ ALL OWNED AUTOS						BODILY INJURY (Per accident) \$
	☒ HIRED AUTOS						PROPERTY DAMAGE (Per accident) \$
	☐ SCHEDULED AUTOS NON-OWNED AUTOS						\$
A	☒ UMBRELLA LIAB ☒ OCCUR			5091223807	09/01/2016	09/01/2017	EACH OCCURRENCE \$ 2,000,000
	☐ EXCESS LIAB ☐ CLAIMS-MADE						AGGREGATE \$ 2,000,000
	DED ☐ RETENTION \$						\$
A	WORKERS COMPENSATION AND EMPLOYERS' LIABILITY			4017691120	09/01/2016	09/01/2017	☒ WC STATUTORY LIMITS ☐ OTHER
	ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED? (Mandatory in NH)	Y/N	N/A				E.L. EACH ACCIDENT \$ 1,000,000
	If yes, describe under DESCRIPTION OF OPERATIONS below						E.L. DISEASE - EA EMPLOYEE \$ 1,000,000
C	Professional Liability w/Pollution Incident			AEXNYABCQZA001	09/01/2016	09/01/2017	E.L. DISEASE - POLICY LIMIT \$ 1,000,000
							Per Claim 2,000,000
							Aggregate 3,000,000

DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES (Attach ACORD 101, Additional Remarks Schedule, if more space is required)

CERTIFICATE HOLDER**CANCELLATION**

For Informational Purposes Only

SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, NOTICE WILL BE DELIVERED IN ACCORDANCE WITH THE POLICY PROVISIONS.

AUTHORIZED REPRESENTATIVE

Eric Moore/CYNDI

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Declaration of Restrictive Covenant

1.0 INTRODUCTION

Environmental Resources Group, LLC (ERG) has prepared this No Further Action (NFA) Report on behalf of Revitalizing Auto Communities Environmental Response (RACER) Trust for the Davison Road Industrial Land Site, located at Davison Road and Donegal Road in Burton, Michigan (Site), Part 201 Facility ID # 25000447 (Figure 1)

Based on soil remediation activities completed to date, results of the groundwater sampling events, and an analysis of the relevant and complete exposure pathways for the Site, ERG has prepared this NFA Report. The NFA Report summarizes the Site history, regional and local hydrogeologic conditions, previous consultants' investigations, and recent investigation and remediation activities completed at the Site. The purpose of this NFA report is to document and present a detailed summary of the Site background and the corrective actions implemented to address remnant contamination from historic operations, primarily from placement of fill. The remedial actions including a Declaration of Restrictive Covenant (DRC) allow RACER to satisfy applicable cleanup criteria established under Part 201 of the Michigan Natural Resources and Environmental Protection Act (NREPA) (Public Act 451). ERG is submitting a Request for Michigan Department of Environmental Quality (MDEQ) Review of NFA Report Form with this report.

1.1 SITE LOCATION

The Site consists of two parcels and occupies 56.21-acres of vacant land located off Davison Road, in the SW ¼ of the NW ¼ of Section 10, T7N, R7E in City of Burton, Genesee County, Michigan, where shown on Figure 1. The area is bound by Davison Road and mixed commercial properties to the north; Canadian National railroad line to the south; Consumer's Power Company right-of-way and a General Motors Customer Care and Aftersales warehouse and distribution facility to the west; and, a vacant parcel to the east. Gilkey Creek crosses the southwest portion of the Site.

1.2 SITE HISTORY

In the 1970s, GMC placed fill on a portion of the Site. The fill included construction debris, miscellaneous inert solid waste and foundry sand primarily from the former GMC Buick Motor Division facility in Flint, MI. The fill is located primarily in the central and southeast portion of the property and, where present, is generally less than five feet thick but can be as much as 13 feet thick in isolated locations. This fill material was the only concern identified for the Site in a Phase I Environmental Assessment (ESA) completed for the Site in 1995.

The remainder of the Site was never used by GMC, with the exception of an asphalt test track that extends through the northern portion of the Site and onto the adjoining parcel to the east. No manufacturing activities took place at this Site. A portion of the Site lies in a floodway and some adjacent ground lies within the 100-year floodplain. In addition, a small portion of the southeast part of the Site is included in the National Wetlands Survey.

1.3 PHYSICAL SETTING

Surface conditions at the Site are characterized by vegetation ranging from cultivated grasses in areas to dense scrubby brush and wooded areas, and a former automobile test track. The Site is relatively flat and dry with the exception of potential wetland areas bordering Gilkey Creek in the southwest corner of the Site and in a 100-year flood plain south-central portion of the Site.

Fill material is present across most of the northern and eastern portions of the Site. The fill material consists of poorly graded sand and some silts and clays interspersed with miscellaneous fill, including construction debris (concrete, wood, brick), some metallic and plastic fragments, foundry sand, and miscellaneous solid waste from the automotive industry. The fill material thickness typically ranges from 1 to 6 feet below ground surface (bgs), although fill material thickness has been noted as deep as 13 feet bgs.

1.3.1 REGIONAL TOPOGRAPHY

The regional landscape of Flint and the surrounding area consists of gently rolling topography. This topography includes a gently sloping ground moraine, broken by several outwash channels and also by numerous end-moraine ridges, some having slightly greater relief than the surrounding ground-moraine topography. Local relief of less than 50 feet is found over areas of several miles. The greatest regional elevation changes are along outwash channels, which are commonly accompanied by steep slopes and are 50 to 100 feet lower than the adjacent ground moraine.

1.3.2 REGIONAL GEOLOGY

The geology of central Genesee County is dominated by two stratigraphic units consisting of unconsolidated glacial deposits of Pleistocene age, underlain by sandstone bedrock. The glacial deposits are composed of a sequence of moraines, outwash and glacial channels, lake bed sediments, and till plains. These overburden materials are underlain by bedrock of the Saginaw Formation, consisting of Pennsylvanian-age sandstones, limestones and shales.

1.3.3 SITE GEOLOGY

The subsurface deposits at the Site have been characterized through the completion of numerous soil borings and the installation of monitoring wells. The overburden deposits identified at the Site can be grouped into the following units:

Fill Material: Fill material is present across most of the Site. The fill material consists of poorly graded sand and some silts and clays interspersed with miscellaneous fill material including construction debris (concrete, wood, brick), some metallic and plastic materials, foundry sand, and miscellaneous solid waste. The fill material thickness typically ranges from 1 to 6 feet below ground surface, although fill material thickness has been noted as deep as 13 feet bgs.

Lean Clay with Interbedded Sands and Silts: A glacial till deposit consisting of lean clay with silt underlies the fill material at the Site. Minor constituents of the lean clay include few fine-to-coarse subrounded sand particles and trace fine-to-medium gravel particles. The interbedded sand and silt lenses are typically moist to wet and consist of a yellowish-brown fine sand or a brownish-gray to gray silty sand. The estimated thickness of the glacial till in the Flint area ranges from 50 to 100 feet (Humphrys, 1960).

1.3.4 REGIONAL HYDROGEOLOGY

The regional groundwater flow direction within the sandstone bedrock is generally to the north across Genesee County, with groundwater eventually discharging to Saginaw Bay and Lake Huron (Wiitala et al., 1963). Regionally, two distinct water-bearing zones are identified as the glacial drift and bedrock. The glacial drift water-bearing zone consists of discontinuous sand layers within the till. These layers can be fully saturated and have a higher short-term yield than the glacial till. The glacial drift water-bearing zone is typically not used as a source of potable water due to its limited yield.

1.3.5 SITE HYDROGEOLOGY

The hydrogeology of the Site has been characterized as shallow groundwater, which is present as localized sections of perched groundwater atop the lean clay material, and also in the interbedded sand and silt lenses located within the lean clay material. Groundwater is typically encountered at a depth of 8 to 13 feet bgs in the interbedded sand and silt lenses within the lean clay material, and this hydrogeologic unit likely controls the movement of shallow groundwater at the Site.

The wide variation in the horizontal and vertical distribution of fill materials, combined with the interbedded sands and silts present in an underlying low-permeability lean clay unit, produces localized water table mounds. Site groundwater elevation measurements collected as part of the Site investigations indicate that the general groundwater flow direction is to the southwest toward Gilkey Creek in the southwest portion of the Site and to the north in the northern portion of the Site. Gilkey Creek has been identified to be both a losing and gaining creek, depending on the time of year and/or significance of a precipitation event. Data from August 2007 through December 2007 show that the water elevation in Gilkey Creek is higher than the groundwater elevation as measured in monitoring wells positioned along its banks. Groundwater flow is not influenced by other pumping sources, as there are no active drinking or industrial water production wells at the Site. Hydraulic conductivity tests have not been conducted at the Site. There is no potable water located on-Site.

2.0 SITE INVESTIGATIONS AND REMEDIAL ACTIVITIES

2.1 SITE INVESTIGATION AND REMEDIATION

Site investigations were completed by GMC from 1996 through November 2007. The investigations included soil and groundwater characterization, fill delineation, and ecological habitat assessment. RACER completed additional Site Investigations from 2012 through the present.

2.1.1 PHASE I ENVIRONMENTAL SITE ASSESSMENT REPORT-MARCH 1995

In March 1995, Consetoga-Rovers Associates (CRA) prepared a Phase I Environmental Site Assessment (ESA) report for the AC Delco Systems 200-acre parcel, Flint East. It should be noted that the western portion (56-acres) of the original 200-acre parcel was subsequently divided and is currently the subject Site.

CRA identified two potential areas of concern (PAOCs) on the 200-acre property including on-site filling of foundry sand and solid waste and two Leaking Underground Storage Tank sites located adjacent to the 200-acre property.

2.1.2 PHASE II ESA-MAY 6, 1996

A Phase II ESA of the 160-Acre Parcel East of Delphi Energy and Engine Management Systems, Plant 7, dated May 6, 1996 was prepared by Techna Corp on behalf of GMC. The Phase II was conducted on the current Site as well as the east adjacent property. The Phase II ESA was conducted in response to the PAOCs identified in the Phase I ESA.

Soil and groundwater sampling activities were conducted at 11 locations to evaluate the site. Four monitoring wells (MW-1 through MW-4) were installed to characterize site groundwater. Select samples were submitted for volatile organic compound (VOCs), semi VOCs, RCRA metals and herbicides and pesticides.

Analytical results of soil and groundwater samples submitted contained minimal impact of PNAs, VOCs and metals. One soil sample contained benzo (a) pyrene above the MDEQ Part 201 Non-Residential direct contact criteria.

Excerpts of the Techna Report are included below:

“The conceptual geologic profile of near-surface fill materials composed of foundry sand, and construction over native soils in the southwest portion of the site has been supported and further defined. Native soils beneath the fill material and the eastern portion of the site consist of interbedded clays, silts and sands....

No evidence of a potential release to shallow site groundwater of petroleum product from LUST sites reported to the north of the site was identified at the observation well installed along the north-central property boundary during this investigation....”

2.1.3 REVISED SITE INVESTIGATION REPORT-FEBRUARY 11, 2008

A revised Site Investigation Report (revised SIR) of the 56-Acre Undeveloped Property Adjacent to Delphi Energy & Engine, dated February 11, 2008, was prepared by Arcadis. This report summarized investigation activities conducted between 2003 and 2007. Additionally, this report summarized the July 2007 Habitat Assessment report prepared by Exponent EcoSciences of Bellevue, Washington. Excerpts of the SIR are included below:

This section summarizes the findings of the 2003 - 2007 Site investigations performed by ARCADIS BBL, as well as a habitat assessment performed by Exponent.”

Soil Data

The Fill Area operated at the Site during the 1970’s has been delineated based on visual observation and subsurface soil sampling. This area has been determined to measure approximately 21 acres in size.... It is important to note that the focus of the investigations was to delineate the lateral extent of the Fill Area; therefore, only limited data exist (laboratory analytical and vertical extent) for the interior portions of the Fill Area.

Soil samples collected during the investigations completed in 2003/2004 across the Fill Area exhibited concentrations of analytes which exceeded Part 201 RDWP, IDWP, GSIP, RDC, IDC, and/or C4DC criteria. Direct contact criteria are exceeded by arsenic, benzo(a)pyrene, and/or benzo(b) fluoranthene at three surface soil sample locations located within the Fill Area. Part 201 RDWP, IDWP, and/or GSIP criteria were exceeded in several soil samples for antimony, cobalt, mercury, selenium, zinc, ethylbenzene, xylene (total), carbazole, dibenzofuran, fluoranthene, fluorene, naphthalene and phenanthrene; however, the groundwater samples collected do not exceed corresponding Part 201 GSI, IDW, or RDW criteria for these compounds. The concentration of arsenic in soil at TW-1 (0-2 ft) (7.9 milligrams per kilogram [mg/kg]) slightly exceeds the corresponding Part 201 RDC criterion (7.6 mg/kg). As part of their review of investigations performed on behalf of the City of Flint, the Michigan Department of Environmental Quality has acknowledged that arsenic concentrations in soil up to 22 mg/kg are typical of the Flint and Detroit areas. This information is detailed in the Final Phase II Environmental Site Assessment, University Park Housing Site, Saginaw & Cornella Streets, Flint, Michigan, dated December 1997 and prepared by Snell Environmental Group, Inc. of Lansing, Michigan. Manganese was detected at concentrations in soil which exceed Part 201 RDWP, IDWP and GSIP criteria. Manganese was also detected in groundwater at concentrations which exceed criteria. Pentachlorophenol was detected in soil at concentrations which exceed RDWP and IDWP criteria; however, the groundwater samples collected at the Site do not exceed corresponding Part 201 RDW or IDW Burton, Michigan criteria for pentachlorophenol.

Based on the results of the 2003/2004 soil analysis, ARCADIS BBL subcontracted and observed the installation of a fence enclosing the Fill Area due to the presence of multiple contaminants that exceed direct contact criteria.

Groundwater Data

Groundwater samples collected in 2003/2004 at the Site detected manganese (total and dissolved) at concentrations which exceed Part 201 RDW and IDW criteria. Manganese detections exceed Part 201 aesthetic RDW and IDW criteria and Residential Health Based Drinking Water Value of 860 µg/L at one monitoring well location (TW-1) at the Site. None of the detections exceed the Industrial-Commercial Health Based Drinking Water Value of 2,500 µg/L. Several metals in groundwater samples collected in 2007 exceeded Part 201 RDW and IDW criteria. Detections of iron and arsenic exceeded the Industrial-Commercial Health Based Drinking Water Values of 700 and 10 µg/L, respectively in both August and November.

Summary of Habitat Assessment

The habitat assessment conducted by Exponent in July 2007 revealed the following findings:

- The presence of several habitat types that likely support ecological receptors at the Site, including early successional shrub/forest, mature deciduous floodplain forest, open field/disturbed areas, and Gilkey Creek.*
- Signs or direct observations of wildlife were recorded during the Site visit.*
- Potential ecological receptors are likely to include both terrestrial and aquatic species, due to the presence of both habitat types on-Site.*
- No special-status species or habitat for listed species are present on or near the Site.*
- Areas on-Site in the vicinity of the creek likely meet the criteria for wetlands.*

2.1.4 SITE UPDATE REPORT-DECEMBER 20, 2013

ERG, in affiliation with Wilcox Professional Services (WPS) prepared an Investigative Work Plan (IWP) dated May 22, 2012 to address gaps in the existing data. The proposed investigation activities in the IWP included the installation of 28 soil borings and collection of 30 soil samples; installation of 15 groundwater monitoring wells; groundwater monitoring well and surface water sampling; aquifer tests and analysis; and, property boundary and topographic surveys.

In July 2012, 28 soil borings and 15 monitoring wells were installed at the Site. Soil borings were advanced to evaluate gaps in the previous data obtained and to further define of extent of impacted soils identified in the previous investigations. Additional monitoring wells were installed to evaluate groundwater flow direction and the extent of groundwater impact at the Site.

A total of 30 soil samples were collected for laboratory analysis. Soil samples were analyzed for VOCs, metals and SVOCs or PNAs. Groundwater and surface water samples were collected in August 2012, November 2012, April 2013, and July 2013.

In September 2012, ERG conducted slug testing on monitoring wells MW-5-12, MW-9-12 and MW-12-12 in order to further evaluate groundwater flow parameters, such as hydraulic conductivity (K) and rate of flow. The test results were analyzed according to the Bouwer and Rice (1976) method for unconfined aquifers.

A boundary and topographic survey of the Site was conducted to develop a base diagram to depict pertinent sample locations and features, including historic fill limits, areas below the 100-year flood elevation of Gilkey Creek, wetlands, monitoring wells, etc.

Soil Results

Analytical results identified concentrations of naphthalene above the Non-Residential Groundwater / Surface Water Interface Protection (GSIP) criteria in SB-26-12 (3-4'). Soil collected from SB-25-12 (11-12') contained concentrations of ethylbenzene above the GSIP criteria and styrene above the Drinking Water protection (DWP) criteria and the GSIP criteria. Analytical results of soil sampled from SB-27-12 (2-3') identified concentrations of tetrachloroethylene (PCE) and trichloroethylene (TCE) above the DWP and GSIP criteria; and fluoranthene and phenanthrene above the GSIP criteria. No other SVOCs or VOCs were detected above the non-residential cleanup criteria.

Concentrations of metals were detected in all samples submitted for laboratory analysis. Concentrations of metals including aluminum, arsenic, cobalt, iron and manganese exceeded the DWP criteria.

Concentrations of arsenic, cobalt and mercury exceeded the GSIP criteria. Analysis also detected concentrations of all metals except vanadium above the Statewide Default Background Levels in several soil borings.

Groundwater/Surface Water

Groundwater flows towards Gilkey Creek on the southern portion of the Site and radially on the northern portion of the Site. Based on the slug test data collected the average K value was estimated to 2.4×10^{-4} cm/sec.

Laboratory analysis of groundwater and surface water did not identify concentrations of VOCs, SVOCs or PNAs above the laboratory detection limit in any of the samples analyzed. Laboratory analysis identified several metal concentrations total including arsenic, iron, manganese and vanadium above the nonresidential drinking water criteria in several wells. Concentrations of arsenic were detected above the GSIP criteria in monitoring wells MW-1-12, MW-2, MW-3-12, MW-4-12, MW-6-12, MW-8-12, MW-9-12, MW-10-12, MW-12-12 and D-3-East (drainage ditch – upstream).

2.1.5 ADDITIONAL INVESTIGATION REPORT – APRIL 15, 2015

ERG conducted additional investigation activities at the site to address the MDEQ comments on the Site Update Report dated December 20, 2013. On July 17, 2014, ERG met with the MDEQ and the following issues were discussed and agreed upon in order to further delineate and evaluate the groundwater/surface water interface (GSI) pathway in an effort to achieve site closure.

To address the MDEQ's concerns, two soil borings/monitoring wells (SB-MW-15-14 and SB-MW-16-14) were installed at the Site on September 22 -25, 2014 to further define the extent of impacted soil and groundwater identified in the previous investigations, and to define the GSI compliance point. Twelve groundwater samples were collected from monitoring wells located near the drainage ditch and Gilkey Creek (including newly installed SB/MW-16-14) and analyzed for arsenic only. These wells were sampled to confirm GSI compliance. In addition, one newly installed monitoring well (MW-15-14) was analyzed for (VOCs) Base Neutral Acids (BNAS), 10 Michigan Metals and Aluminum. Two surface water samples were collected from Gilkey Creek (GC-1 up and GC-3 down) and submitted for analysis for arsenic and hardness. ERG attempted to collect samples from the drainage ditch and the mid-point from Gilkey Creek, however, due to the inadequate amount of surface water present, a sample wasn't collected.

Two soil samples were collected for laboratory analysis. Soil collected from SB/MW-15-14 (7.5-9.5') was analyzed for VOCs, BNAs, 10 MI metals and aluminum. Soil collected from SB/MW-16-14 (6-7') was analyzed for arsenic only.

Low flow sampling methodology was used to collect water samples from MW-15-14. Water quality parameters including pH, specific conductivity, temperature, dissolved oxygen, oxidation-reduction potential, and turbidity were recorded during purging until the readings stabilize within 10% prior to sample collection. Groundwater collected from this well was analyzed for VOCs, BNAs, 10 Michigan Metals (total metals), including total arsenic and aluminum.

ERG collected groundwater samples from 12 additional monitoring wells including: MW-3-12, MW-4-12, MW-7-12, MW-9-12, MW-11-12, MW-12-12, MW-13-12, MW-14-12, MW-16-14, TMW-1, TMW-6 and TMW-8. These samples were analyzed for total arsenic only. These samples were collected after purging three well volumes and no water quality parameters were collected, as approved by the MDEQ Project Manager.

Only two surface water samples could be collected from the established sampling points from Gilkey Creek (GC-1-up and GC-3-down). A surface water sample could not be collected from the established mid-point sampling location due to an inadequate amount of surface water present. Surface water was not observed in the drainage ditch located along the southern portion of the site and samples could not be collected. All surface water samples were analyzed for total arsenic and hardness.

Analytical results of soil collected from SB/MW-15-14 did not identify concentrations of VOCs or SVOCs above the laboratory detection limits. Concentrations of metals, including aluminum, cobalt, iron, and

manganese were detected above the DWP criteria. Concentrations of cobalt and manganese also exceeded the GSIP criteria.

ERG calculated the *Generic Facility Specific Part 201 Groundwater Surface Water Interface Protection (GSIP) Criteria for {G} Footnoted Hazardous Substance*. The GSIP criteria was calculated using the most conservative, lowest hardness value of 290 mg CaCO₃/L collected from surface water sample GC-3 (Downstream). Facility specific GSIP criteria were calculated for cadmium, copper, manganese and zinc.

The results indicated that cadmium, copper, manganese and zinc exceed the calculated GSIP criteria at several locations. Additionally, several metals (as discussed in the December 20, 2013 report) exceeded the Statewide Default Background Levels and GSIP in several soil borings.

Laboratory analysis of groundwater collected from the newly installed monitoring well did not identify concentrations of VOCs or SVOCS. Laboratory analysis identified several metal concentrations in the sample collected from MW-15-14 above the laboratory detection limit total including arsenic, iron, manganese and vanadium above the non-residential drinking water criteria in several wells. Concentrations of arsenic were detected above the GSI criteria in samples collected from MW-3-12, MW-9-12, MW-12-12, MW-15-14 and MW-16-14.

As stated above, ERG calculated the *Generic Facility Specific Part 201 Groundwater Surface Water Interface (GSI) Criteria for {G} Footnoted Hazardous Substance*. The GSI criteria was calculated using the most conservative, lowest hardness value of 290 mg/CaCO₃/L collected from surface water sample GC-3 (Downstream). Facility specific GSI criteria were calculated for cadmium, copper, manganese and zinc. See Appendix C for the MDEQ calculation spreadsheet.

The calculated GSI criteria were compared to analytical results from all groundwater sampling events. Review of the results from the 2012, 2013 and 2014 sampling events, concentrations of manganese and copper exceeded the calculated facility specific GSI criteria in several monitoring wells.

As requested by the MDEQ, quarterly groundwater sampling was conducted of the GSI compliance wells MW-8 MW-3-12, MW-9-12, MW-12-12, MW-15-14 and MW-16-14 for four consecutive quarters. All data including analytical tables, groundwater concentration figures and groundwater gradient map are included in the attachments.

2.1.6 MIXING ZONE REQUEST-DECEMBER 22, 2015

On behalf of RACER, ERG requested a mixing zone determination from the MDEQ. ERG proposed that utilizing a mixing zone calculation along portions of the receiving surface water body (Gilkey Creek) would demonstrate that any discharge of venting groundwater would be in compliance with current water quality standards, and no further action to address the GSI pathway would be necessary.

In a correspondence dated May 25, 2016, the MDEQ denied the Mixing Zone Request. The MDEQ stated that "Based on review of flows for Gilkey Creek by staff of the DEQ, Water Resources Division, there is not

enough flow in this creek to allow for a mixing zone. Arsenic concentration at all groundwater surface water interface compliance points cannot exceed 10ug/l.” The MDEQ offered several suggestions to possibly develop evidence to show that the arsenic or any other metals (copper, manganese and zinc) in the groundwater is not a result of historical property use.

2.1.7 SOIL DIRECT CONTACT EXCEEDANCE DELINEATION REPORT-JANUARY 14, 2016

ERG prepared the Soil Direct Contact (DC) Exceedance Delineation Report to address soils which contained concentrations of PNAs above the Non-Residential Soil Direct Contact Criteria DCC.

In 2004, numerous soil borings were in advanced in the northeast portion of the Site. One soil sample collected from soil boring MW4-04-SO2 contained concentrations of benzo(a)pyrene above the DCC. Review of the historical figures and analytical data indicated that the horizontal extent of the PNA impact was delineated below the DCC; however, the nearest boring was located approximately 25 to 30 ft. from the MW-4-04-SO2 boring location. Additionally, the vertical extent of PNAs were not delineated below the DCC as the 6-8 ft bgs sample interval was the only sample submitted for analysis.

A soil sample collected from FA-17 - 0-1 ft. bgs, contained concentrations of benzo(a)pyrene above the DCC. No additional soil samples were collected or analyzed from the FA-17 boring location and the vertical and horizontal extent of PNA impact was not delineated.

To address the DCC exceedances, 26 soil borings were installed in and around the MW4-04-SO2 and FA-17 locations. ERG utilized survey data from 2004 and 2012 to determine the exact location of soil borings MW-04-04-SO2 and FA-17. The 2004 boring locations and a series of step out borings emanating in a north, south, east and west direction; at distances of 10 ft., 15 ft. and 20 ft. from the original boring locations were surveyed and staked. A geoprobe was used to collect continuous soil samples from each of the new boring locations. Select soil samples were submitted for laboratory analysis of PNAs.

Continuous soil samples were collected in two foot intervals to a maximum boring depth of 20 feet bgs. A total of 208 samples were collected from the two areas of concern identified. The purpose of collecting numerous samples was to avoid multiple mobilizations. Select samples were expeditiously analyzed in order to systemically delineate the vertical and horizontal extent of impact, while the remaining samples were placed on hold.

Results

Analytical results did not identify PNAs above the DCC in any of the soil samples submitted in the area of the FA-17 (DC-17) boring located on the southern portion of the Site and therefore no further action is necessary.

Analytical results identified one sample (DC-5-10' [6-8']) located south of the original MW-4-04-SO2 boring location contained PNAs above the DCC. Analysis of soils from the DC-5-10 ft. location collected from the 0-2', 2-4', 4-6' and 8-10' sample intervals did not contain PNAs above the DCC. Furthermore,

analysis of samples collected from step out boring DC-6-15 ft. located 15 ft. south of MW-4 -04-SO2 did not identify concentration of PNAs above the DCC from the 0-2', 2-4', 4-6', 6-8' or 8-10' sample intervals.

The extent of PNA impact exceeding the DCC has been delineated to an approximate 10 ft x 10 ft x 2 ft volume. To address the exceedance above the DCC, ERG proposed excavation and disposal the soil containing PNAs above the DCC in order to eliminate the direct contact pathway.

2.1.8 DIRECT CONTACT REMEDIAL SOIL EXCAVATION SUMMARY- AUGUST 16, 2016

Analytical results of an area of the fill material located on the northeastern portion of the site (near MW-4-04-SO2) contained benzo (a) pyrene concentrations above the DCC. To address the exceedance of PNAs above the DCC, the fill material which contained PNAs above the DCC was excavated and transported off-site for disposal. The removal of the PNA impacted soil above the DCC was implemented to eliminate the direct contact exposure pathway at the Site.

On July 21, 2016, a 10 feet wide by 10 feet long by approximately 10 feet deep excavation was conducted by HM Environmental. The upper six feet of non-impacted soil was removed from the excavation and stockpiled on visqueen. This non-impacted overburden soil was used to backfill the excavation. Prior to using the stockpiled soil as backfill, one composite sample was collected and submitted for laboratory analysis of PNAs.

Upon removal of the upper six feet of overburden soils, HM excavated and transported 26.74 tons of impacted soil to Venice Park RFD (Venice Park), in Lennon, MI for disposal under proper manifesting protocols. The excavation extended to 10 feet below grade surface. The material excavated contained metal, asphalt and brick debris. No groundwater was encountered in the excavation. ERG collected five soil samples, one from the excavation floor and four from the sidewalls.

One composite sample from the overburden soil and five floor and sidewall samples were submitted for expedited analysis on a 48-day turn-around time (TAT) of PNAs.

Analytical results of the composite sample, floor sample (DC-EX-Bottom (10')) and three sidewall samples (DC-EC-N Wall (7.5'), DC-EX-S.Wall (6.5') and DC-EX-W Wall (7')) did not exhibit concentrations of PNAs above the laboratory detection limits and/or above the non-residential DCC. Analytical results of the east sidewall sample (DC-EX- W Wall (6.5')) contained PNAs, specifically benzo (a) pyrene above the non-residential DCC.

On July 28, 2016, ERG and HM remobilized to the Site and remove an additional five feet of soil from the east side of the excavation. As with the first excavation, the top six feet of overburden soils were removed and stockpiled. Once the overburden soil was removed, HM excavated and transported an additional 10.72 tons of soil to Venice Park for disposal. ERG collected a side wall sample (EC-EX-E Wall #2 (6.5')) and submitted it to Merit to be analyzed for PNAs on a 48-hour TAT. Analytical results of the east wall sample did not exhibit any PNAs above the laboratory detection limit. The total amount of impacted soil disposed of was 37.46 tons.

On August 11, 2016, HM backfilled filled the excavation with the stockpiled soils. Upon compacting the stockpiled soils, HM backfilled and compacted the remainder of the excavation with approximately 43.85 tons of clean Michigan Department of Transportation (MDOT) 2NS sand to match surrounding grade.

3.0 DECLARATION OF RESTRICTIVE COVENANT

A Declaration of Restrictive Covenant (DRC) was filed for the Site and recorded with the Genesee County Register on April 11, 2017. A copy of the DRC recorded with the Genesee County Register of Deeds is provided in Appendix C. The DRC includes the following prohibitions:

1. Land Use Prohibitions. The Owner shall refrain from or otherwise prohibit all uses of the Property that are not compatible with nonresidential land use category under MCL 324.20120a(1)(b) and generally described in the Description of Allowable Uses, attached hereto as Exhibit 4.

Part 201 cleanup criteria for land use-based response activities are located in the Government Documents Section of the State of Michigan Library, MCL 324.201201, *et seq.*, effective December 27, 2012. These environmental protection standards which are necessary for cleanup and protection of soil, groundwater, surface water, sediments and ambient air can be used as long as the cleanup criteria are not less stringent than allowed pursuant to RCRA. a

2. Activities Prohibited. The Owner shall refrain from or otherwise prohibit activities on the Property that may result in exposures above the nonresidential land use category. These prohibited activities include:
 - a. Installation or use of drinking water or irrigation wells on the Property.
 - b. Installation or use of groundwater extraction wells on the Property except for wells and devices that are part of an MDEQ-approved response activity and for short-term dewatering for construction purposes, provided the dewatering, including management and disposal of the groundwater, is conducted in accordance with all applicable environmental laws and does not cause or result in a new release, exacerbation of any pre-existing environmental condition, or any other violation of environmental laws.
 - c. Disturbance, damage, modification, or removal any monitoring wells (if present) on the Property without the prior written approval of MDEQ and RACER. Monitoring wells present at the Property as of the date of this Amended Restrictive Covenant are identified in Exhibit 5.
 - d. Relocation of contaminated soils on the Property except as provided for under Part 201, Section 20120c, MCL 324.20120c.
 - e. "Treatment", "storage", "disposal", or "release" of any Hazardous Substances, on, at, or below the Property, in a manner that would require a permit under the RCRA, or equivalent State law, except pursuant to a plan or permit approved in writing by MDEQ.

- f. Removal of any slabs, pavement or other impervious surface on the Property, unless Owner takes responsibility for any and all obligations under environmental laws arising from any such removal, alteration or disturbance, whether or not caused by, arising from or related to, an environmental condition.
- g. Building or occupying any structure without first completing one of the following: Option 1) evaluate and determine, in accordance with applicable environmental laws, rules or regulations and to the satisfaction of MDEQ that no unacceptable vapor intrusion risks to human health exist in any existing or newly constructed site buildings; or Option 2) with the concurrence from MDEQ install, operate, and maintain a vapor barrier and/or mitigation system designed to eliminate the potential for subsurface vapor phase hazardous substances to migrate into any building at concentrations greater than applicable criteria. This prohibition does not apply to short-term (sixty (60) days or less), occupancy of a building for purposes of construction, renovation, repair, or other short-term activities as long as adequate health and safety precautions are employed during these activities, and they are performed in compliance with Section 20107a of NREPA.

If Option 2 above is selected, the Owner shall install and thereafter maintain a vapor barrier and/or install and thereafter operate and maintain a vapor intrusion mitigation system in accordance with applicable standards and criteria at the time, for the purpose of mitigating the potential intrusion of soil vapor below any human-occupied building constructed on the property after the date of this Amended Restrictive Covenant, until it is determined by MDEQ that a vapor barrier or mitigation system is no longer necessary in accordance with Option 1, above.

- 3. Contaminated Soil Management. The Owner shall manage contaminated soils, media and/or debris (if any) and all other soils located at the Property whether encountered on the surface or during below grade work in accordance with any applicable requirements of Part 111, Subtitle C of RCRA, the administrative rules promulgated pursuant to Part 111 and RCRA, and all other relevant State and Federal laws, including but not limited to MCL 324.20120c.
- 4. Access. The Owner shall grant MDEQ and RACER the right to enter the Property at reasonable times (1) to conduct and complete any and all response activities, together with any reasonably needed ingress and egress to the Property, and (2) for the purpose of determining and monitoring compliance with this Amended Restrictive Covenant, including the right to take samples and, inspect any records relating thereto, and to perform any actions necessary to maintain compliance with Part 111 and Part 201.
- 5. Notices. Any notice, demand, request, consent, approval, or communication that is required to be made or obtained under this Amended Restrictive Covenant shall be made in writing and shall: include a statement that the notice is being made pursuant to the requirements of this Amended

Restrictive Covenant; include the MDEQ Reference Number: RC-OWMRP-111-17-002; and be served either personally, or sent via first class mail, postage prepaid, as follows:

For MDEQ:

Remediation and Redevelopment Division Chief
Michigan Department of Environmental Quality
P.O. Box 30426
Lansing, MI 48909-7741

AND

Waste Management and Radiological Protection Division Director
Michigan Department of Environmental Quality
P.O. Box 30473
Lansing, MI 48909-7741

For RACER:

RACER Trust
Attn: Michigan Clean-up Manager
500 Woodward Avenue
Detroit, MI 48226

6. Conveyance of Property Interest. The Owner shall provide notice to MDEQ and RACER at the addresses in Paragraph 5 of the Owner's intent to transfer any interest in the Site at least fourteen (14) days prior to consummating the conveyance. A conveyance of title, easement, or other interest in the Site shall not be consummated by the Owner without adequate and complete provision for compliance with the terms and conditions of this Restrictive Covenant and the applicable provisions of MCL 324.20116. Owner shall include in any instrument conveying any interest in any portion of the Site, including, but not limited to, deeds, leases, and mortgages, a notice.

4.0 NON-RESIDENTIAL CLEANUP CRITERIA PATHWAY EVALUATION

ERG has completed an analysis of each of the exposure pathways and constituents of concern (COC) concentrations to be considered for the protection of public health, safety, or welfare or the environment, and the “relevant” Site-specific conditions applicable to each exposure pathway. When an exposure pathway is considered “complete” or “potentially complete,” pathway-specific cleanup criteria can be used to determine whether Site conditions are acceptable. Site data can be evaluated by comparing the data to applicable cleanup criteria to determine whether additional Site-specific activities are warranted. If a Site is adequately characterized and the data is below pathway-specific criteria, then no further action is necessary to address the specific exposure pathway.

This NFA report identifies which pathways and conditions are relevant, which criteria are applicable, and documents the reasons for those conclusions. ERG evaluated all data related to the Site to identify relevant potential exposure pathways. Based on the results of the exposure pathway assessment, applicable cleanup criteria were identified.

4.1 SOIL EXPOSURE PATHWAY EVALUATION

Soil exposure pathways assessed for the Site included the following:

- Drinking Water Protection,
- Groundwater Surface Water Interface Protection,
- Soil Volatilization to Indoor Air, and
- Direct Contact

4.1.1 DRINKING WATER PROTECTION PATHWAY

The drinking water protection (DWP) pathway is considered relevant because laboratory analysis of soil samples collected on-Site have exceeded the Non-Residential DWP criteria at various locations throughout the Site. Groundwater is not being used as a drinking water source at the Site, the Site is serviced by the municipal water supply system, and a DRC has been filed to prohibit the use of groundwater. Therefore, no further action is required to address the DWP criteria.

4.1.2 GROUNDWATER SURFACE WATER INTERFACE PROTECTION PATHWAY

Several COCs exceed the MDEQ Part 201 groundwater/surface water interface protection (GSIP) pathway. Arsenic is the only one that consistently exceeds the non-residential GSIP criteria. Therefore, the GSIP pathway is a relevant and complete pathway.

4.1.3 SOIL VOLATILIZATION TO INDOOR AIR INHALATION PATHWAY

There are no COCs which exceed the soil volatilization to indoor air (VI) pathway. Therefore, the soil VI pathway is not relevant. Furthermore, there are currently no structures located on-Site. However, in order to provide for future consideration of this pathway should a future owner want to build a structure, the

recorded DRC prohibits an owner from building or occupying any structure on the Site without first evaluating the vapor intrusion risk or install and maintain a vapor barrier and/or mitigation system, if applicable.

4.1.4 DIRECT CONTACT WITH SOIL PATHWAY

No soil concentrations on Site exceed the MDEQ Part 201 Non-Residential soil direct contact (DC) criteria. Because soil concentrations are below DC criteria, the direct contact pathway is not complete.

4.2 GROUNDWATER EXPOSURE PATHWAY EVALUATION

Groundwater exposure pathways assessed for the Site included the following:

- Drinking Water,
- Groundwater Surface Water Interface, and
- Groundwater Volatilization to Indoor Air

4.2.1 DRINKING WATER PATHWAY

Groundwater COCs exceed the Part 201 non-residential drinking water (DW) criteria and the pathway is considered relevant. Groundwater is not being used as a drinking water source at the Site, the Site is serviced by the municipal water supply system, and a DRC has been filed to prohibit the use of groundwater. Therefore, no further action is required to address the DW criteria.

4.2.3 GROUNDWATER/SURFACE WATER PATHWAY

Several COCs exceed the MDEQ Part 201 groundwater/surface water interface (GSI) pathway. The GSI pathway is a relevant and complete pathway.

4.2.4 VOLATILIZATION TO INDOOR INHALATION PATHWAY

There are no COCs which exceed the volatilization to indoor air (VI) pathway, therefore the groundwater VI pathway is not relevant. Furthermore, there are currently no structures located on-Site. However, in order to provide for future consideration of this pathway should a future owner want to build a structure, the recorded DRC prohibits the owner from building or occupying any structure on the Site without first evaluating the vapor intrusion risk or installing and maintaining a vapor barrier and/or mitigation system, if applicable.

5.0 MARKERS

Markers are not required for the Site according to 20114c(2)(b).

6.0 CONCLUSIONS

The soil and groundwater impacts associated with the former filling at the Site have been adequately characterized. The soil with impacts that exceed DCC has been excavated.

Exceedances of DWP criteria in soil and DW criteria in groundwater have been addressed by recording a DRC that prohibits use of groundwater.

Exceedances of GSIP criteria in soil have been adequately characterized. Exceedances of the GSI criteria in groundwater have been adequately characterized and the only constituent for which the pathway is relevant and complete is arsenic. The GSIP and GSI pathways will require further evaluation for arsenic.

There is no current complete volatilization to indoor air pathway and the potential for a future complete volatilization to indoor air pathway has been addressed by recording a DRC that provides for consideration of this pathway should a future owner want to build a structure. The recorded DRC prohibits the owner from building or occupying any structure on the Site without first evaluating the vapor intrusion risk or installing and maintaining a vapor barrier and/or mitigation system, if applicable

Based on the remedial action activities that have been completed at the Site and the information presented in this Report, ERG respectfully requests that MDEQ approve a restricted Non-Residential NFA status for the Site, with the exception of the GSIP and GSI pathway for arsenic

7.0 REFERENCES

Conestoga-Rovers and Associates, *Phase I Environmental Site Assessment*, AC Delco Systems, 200 Acre Parcel Flint East, Flint, Michigan - March 1995

Techna Corporation, *Phase II Environmental Site Assessment*, 160-Acre Parcel, East of Delphi Energy & Engine Management Systems Plant 7, Davison Road Burton, Michigan-May 6, 1996

Exponent, *Habitat Assessment for General Motors 56-Acre Undeveloped Property, Burton, Michigan*-February 1, 2008

Arcadis, *Revised Site Investigation Report*, 56-Acre Undeveloped Property Adjacent to Delphi Energy & Engine, Management Systems, Plant 600/700 Burton, Michigan-February 11, 2008

Environmental Resources Group, LLC, *Site Update Report*, Davison Road Landfill, Davison and Donegal Road Burton, MI-December 20, 2013

Environmental Resources Group, LLC, *Additional Investigation Report*, Davison Road Landfill, Davison and Donegal Road Burton, MI-March 1, 2014

Environmental Resources Group, LLC, *Request for Mixing Zone Based Criteria*, Davison Road Landfill, Burton, Michigan-December 22, 2015

Environmental Resources Group, LLC, *Soil Direct Contact Exceedance Delineation Report*, Davison Road Industrial Land, Davison and Donegal Road Burton, Michigan-January 14, 2016

Environmental Resources Group, LLC, *Direct Contact Remedial Soil Excavation Summary*, Davison Road Industrial Land Burton, Michigan-August 16, 2016

ATTACHMENT A

FIGURES

FILE:Project\2012-068 Burton Rd RACER Trust\Drawings\Survey\Aug 2016.mxd 17 page sat:12-068_2.dwg DATE:8/21/2016 8:10 AM

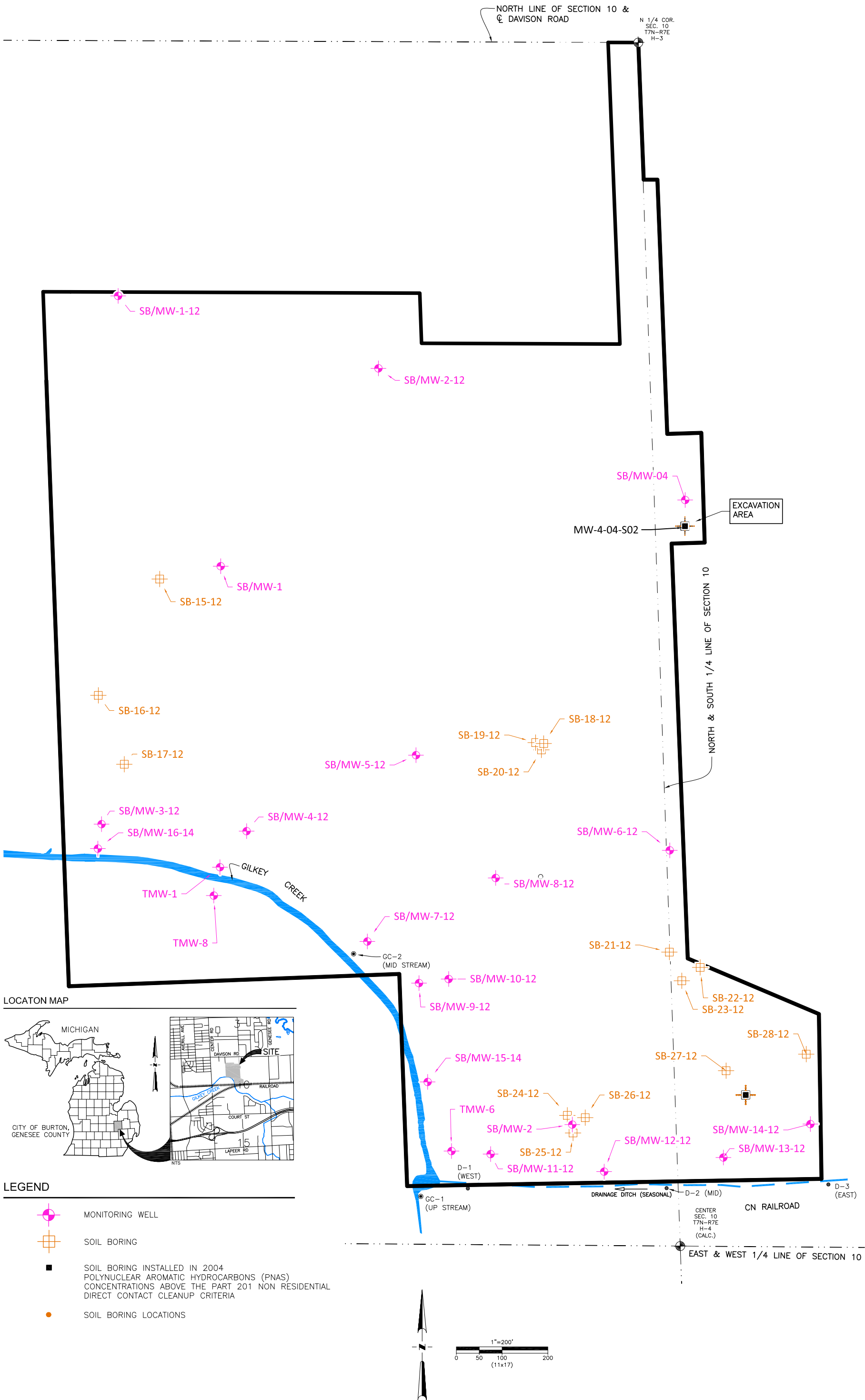


FIGURE
2

DRWG. by :MAJDC
CHECK :
DATE :
12/30/2015
DWG:
12-068_2.dwg

CONT. INT.: N/A
FIELD : MD/SM/LB
V. SCALE : N/A
SCALE: 1"=200'
JOB# : 12-068

REVISED PER COMMENTS
REVISED PER COMMENTS

1/11/16
8/30/16

SITE MAP

RACER TRUST
DAVISON ROAD INDUSTRIAL LAND- BURTON, MICHIGAN

ERG Environmental Resources Group
2800 Center Oaks Court • Suite 106 • Wilkerson, MI • 48993
Phone: 248-772-7986 • Fax: 248-924-3108

\\0303-0001\cadd\0303-0001.dwg User: jason.0303-0001 Date: 11/14/14 Plot Date: 11/14/14 Plot Time: 11:14:14 Plot User: jason.0303-0001

NON-RESIDENTIAL CRITERIA				
Constituent	Statewide Default Background Levels	Non-Residential Drinking Water Protection Criteria and RBSLs	Non-Residential Groundwater Surface Water Interface Protection Criteria and RBSLs	Non-Residential Direct Contact Criteria and RBSLs
Aluminum (B)	6.9E+6	1,000	NA	3.7e+8(DD)
Arsenic	5,800	4,600	4,600	37,000
Cadmium (B)	1,200	6,000	* 5,900	2.10E+06
Chromium, Total	18,000 (total)	1.09e+9(D)	(G,X)	1.09e+9(D)
Cobalt	6,800	2,000	2,000	9.00E+06
Copper (B)	32,000	5.8E+6	* 1.3E+5	7.00E+07
Iron (B)	1.2E+7	6,000	NA	5.80E+08
Manganese (B)	4.4E+5	1,000	* 1.0E+5	9.00E+07
Mercury, Total	130	1,700	50 (M); 1.2	5.80E+05
Vanadium	NA	9.90E+05	4.30E+05	5.5E+6 (DD)
Zinc (B)	47,000	5.00E+06	* 2.9E+5	6.3E+8
Fluoranthene	N/A	7.3E+5	5,500	4.6E+7
Phenanthrene	N/A	56,000	2,100	1.6E+6
Ethylbenzene (I)	N/A	1,500	360	1.4E+5 (C)
Naphthalene	N/A	1.05E+05	730	5.20E+07
Styrene	N/A	2,700	2,100 (X)	520000
Tetrachloroethylene	N/A	100	1,200 (X)	88,000 (c)
Trichloroethylene	N/A	100	4,000 (X)	5.0E+5 (C,DD)

NOTE

ANALYTES LISTED ABOVE GSIP & BACKGROUND ONLY

*CALCULATED GENERIC FACILITY – SPECIFIC PART 201 GROUND WATER/ SURFACE WATER INTERFACE (GSI) PROTECTION CRITERIA

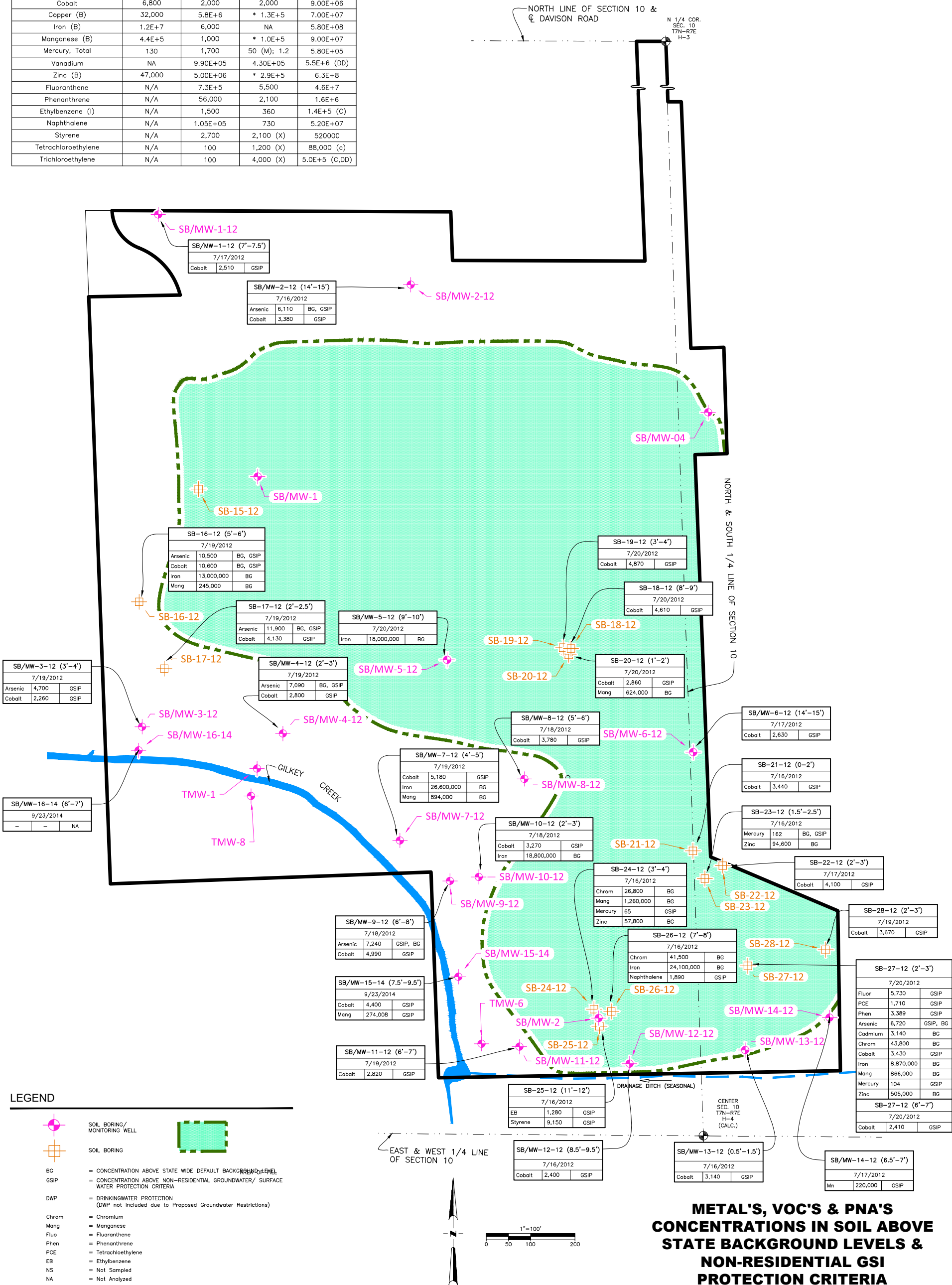


FIGURE
3

DRWG: by: MA
CHECK: by: MA
DATE: 11/22/2013
DWG: 12-068_3.dwg

REVISIONS		DATE
REVISED PER CLIENT REVIEW		12/05/13
ADDED 3 NEW WELLS		11/14/14
REVISED PER COMMENTS		8/30/16

SOIL CONCENTRATION MAP

RACER TRUST
DAVISON ROAD INDUSTRIAL LAND – BURTON, MICHIGAN

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Phone: 248-773-7986 • Fax: 248-924-3108

NOTES

1. Non-Residential Groundwater/Surface Water Interface (GSI) criteria for Arsenic 10 PPB/ug/l.
2. Calculated Facility specific part 201 GSI Criteria for (G) Footnoted Hazardous Substances

Cadmium

4.9

PPB/ug/l

Manganese

5000

PPB/ug/l

Zinc

290

PPB/ug/l

Copper

22

PPB/ug/l
3. *Samples collected during the April 2015 sampling event were not collected using low flow sampling methodology. Low flow sampling methodology was used during all other sampling events.
4. Samples collected during the August sampling event were additionally analyzed for dissolved arsenic &/or zinc – see analytical report for results.

SB/MW-1		
Arsenic (Total)		
8/2012	6	< Criteria
11/2012	6	< Criteria
4/2013	4	< Criteria
7/2013	5	< Criteria
9/2014	–	NS
4/2015	–	NS
8/2015	–	NS
11/2015	–	NS
2/2016	–	NS

SB/MW-5-12		
Arsenic (Total)		
8/2012	3	< Criteria
11/2012	<2	BDL
4/2013	<2	BDL
7/2013	<2	BDL
9/2014	–	NS
4/2015	–	NS
8/2015	–	NS
11/2015	–	NS
2/2016	–	NS

SB/MW-2-12		
Arsenic (Total)		
8/2012	2	< Criteria
11/2012	<2	BDL
4/2013	<2	BDL
7/2013	<2	BDL
9/2014	–	NS
4/2015	–	NS
8/2015	–	NS
11/2015	–	NS
2/2016	–	NS

SB/MW-10-12		
Arsenic (Total)		
8/2012	166	PPB
11/2012	–	NS
4/2013	19	PPB
7/2013	51	PPB
9/2014	–	NS
4/2015*	33	PPB
8/2015	92	PPB
11/2015	819	PPB
2/2016	30	PPB
Arsenic (Dissolved)		
8/2015	77	PPB
11/2015	112	PPB
2/2016	20	PPB

SB/MW-8-12		
Arsenic (Total)		
8/2012	39	PPB
11/2012	–	NS
4/2013	<2	BDL
7/2013	<2	BDL
9/2014	–	NS
4/2015	7	< Criteria
8/2015	–	NS DRY
11/2015	89	PPB
2/2016	<2	BDL
Arsenic (Dissolved)		
11/2015	–	NS DRY
2/2016	<2	BDL

SB/MW-04		
Arsenic (Total)		
8/2012	8	< Criteria
11/2012	–	NS
4/2013	<2	BDL
7/2013	<2	BDL
9/2014	–	NS
4/2015	–	NS
8/2015	–	NS
11/2015	–	NS
2/2016	–	NS
Arsenic (Dissolved)		
11/2015	–	NS
2/2016	–	NS
Copper (B)		
8/2012	22	PPB
11/2012	–	NS
4/2013	100	PPB
7/2013	<4	BDL
9/2014	–	NS
4/2015	–	NS
8/2015	–	NS
11/2015	–	NS
2/2016	–	NS

SB/MW-2		
Arsenic (Total)		
8/2012	102	PPB
11/2012	104	PPB
4/2013	15	PPB
7/2013	26	PPB
9/2014	–	NS
4/2015*	96	PPB
8/2015	97	PPB
11/2015	66	PPB
2/2016	126	PPB
Arsenic (Dissolved)		
8/2015	4	< Criteria
11/2015	62	PPB
2/2016	97	PPB

SB/MW-6-12		
Arsenic (Total)		
8/2012	19	PPB
11/2012	29	PPB
4/2013	2	< Criteria
7/2013	10	PPB
9/2014	–	NS
4/2015*	85	PPB
8/2015	3	< Criteria
11/2015	3	< Criteria
2/2016	<2	BDL
Arsenic (Dissolved)		
8/2012	19	PPB
11/2015	<2	BDL
2/2016	<2	BDL

SB/MW-12-12		
Arsenic (Total)		
8/2012	39	PPB
11/2012	31	PPB
4/2013	29	PPB
7/2013	26	PPB
9/2014	53	PPB
4/2015*	100	PPB
8/2015	31	PPB
11/2015	39	PPB
2/2016	45	PPB
Arsenic (Dissolved)		
11/2015	36	PPB
2/2016	19	PPB
Manganese (B)		
8/2012	4600	< Criteria
11/2012	4610	< Criteria
4/2013	5180	PPB
7/2013	4940	< Criteria
9/2014	–	NA
4/2015	–	NA
8/2015	–	NA
11/2015	–	NA
2/2016	–	NA

SB/MW-13-12		
Arsenic (Total)		
8/2012	<2	BDL
11/2012	3	< Criteria
4/2013	<2	BDL
7/2013	<2	BDL
9/2014	7	< Criteria
4/2015	–	NS
8/2015	–	NS
11/2015	–	NS
2/2016	–	NS
Arsenic (Dissolved)		
11/2015	–	NS
2/2016	–	NS

SB/MW-14-12		
Arsenic (Total)		
8/2012	<2	BDL
11/2012	<2	BDL
4/2013	<2	BDL
7/2013	<2	BDL
9/2014	<2	BDL
4/2015	–	NS
8/2015	–	NS
11/2015	–	NS
2/2016	–	NS
Arsenic (Dissolved)		
11/2015	–	NS
2/2016	–	NS

D-3 (EAST)		
Arsenic (Total)		
8/2012	–	NS
11/2012	–	NS
4/2013	<2	BDL
7/2013	18	PPB
9/2014	–	NS
4/2015	–	NS
8/2015	–	NS
11/2015	–	NS
2/2016	–	NS
Manganese		
8/2012	–	NS
11/2012	–	NS
4/2013	30	< Criteria
7/2013	10,400	PPB
9/2014	–	NS
8/2015	–	NS
11/2015	–	NS
2/2016	–	NS

SB/MW-4-12		
Arsenic (Total)		
8/2012	5	< Criteria
11/2012	12	PPB
4/2013	<2	BDL
7/2013	3	< Criteria
9/2014	4	< Criteria
4/2015*	18	PPB
8/2013	<2	BDL
11/2015	3	< Criteria
2/2016	7	< Criteria
Arsenic (Dissolved)		
8/2015	3	< Criteria
11/2015	<2	BDL
2/2016	<2	BDL

SB/MW-3-12		
Arsenic (Total)		
8/2012	25	PPB
11/2012	19	PPB
4/2013	2	< Criteria
7/2013	13	PPB
9/2014	25	PPB
4/2015*	52	PPB
8/2015	14	PPB
11/2015	10	PPB
2/2016	8	< Criteria
Arsenic (Dissolved)		
8/2015	4	< Criteria
11/2015	9	< Criteria
2/2016	7	< Criteria

SB/MW-16-14		
Arsenic (Total)		
9/2014	15	PPB
4/2015*	68	PPB
8/2015	7	<Criteria
11/2015	13	PPB
2/2016	25	PPB
Arsenic (Dissolved)		
8/2015	10	PPB
11/2015	12	PPB
2/2016	20	PPB

GC-3 (DOWN STREAM)		
Arsenic (Total)		
8/2012	–	NS
11/2012	2	< Criteria
4/2013	3	< Criteria
7/2013	7	< Criteria
9/2014	4	< Criteria
4/2015	–	NS
8/2015	–	NS
11/2015	–	NS
2/2016	–	NS

TMW-1		
Arsenic (Total)		
8/2012	3	< Criteria
11/2012	<2	BDL
4/2013	<2	BDL
7/2013	4	< Criteria
9/2014	5	< Criteria
4/2015*	9	< Criteria
8/2015	<2	BDL
11/2015	2	< Criteria
2/2016	<2	BDL

TMW-8		
Arsenic (Total)		
9/2014	8	< Criteria
4/2015*	427	PPB
8/2015	9	< Criteria
11/2015	12	PPB
2/2016	7	< Criteria
Arsenic (Dissolved)		
8/2015	7	< Criteria
11/2015	12	PPB
2/2016	7	< Criteria

SB/MW-7-12		
Arsenic (Total)		
8/2012	3	< Criteria
11/2012	3	< Criteria
4/2013	<2	BDL
7/2013	<2	BDL
9/2014	<2	BDL
4/2015*	20	PPB
8/2015	<2	BDL
11/2015	<2	BDL
2/2016	<2	BDL
Arsenic (Dissolved)		
11/2015	<2	BDL
2/2016	<2	BDL

GC-2 (MID STREAM)		
Arsenic (Total)		
8/2012	–	NS
11/2012	3	< Criteria
4/2013	<2	BDL
7/2013	6	< Criteria
9/2014	–	NS
4/2015	–	NS
8/2015	–	NS
11/2015	–	NS
2/2016	–	NS
Arsenic (Dissolved)		
11/2015	–	NS
2/2016	–	NS

SB/MW-9-12		
Arsenic (Total)		
8/2012	3	< Criteria
11/2012	N/A	PPB
4/2013	<2	BDL
7/2013	6	< Criteria
9/2014	23	PPB
4/2015*	21	PPB
8/2015	3	< Criteria
11/2015	5	< Criteria
2/2016	<2	BDL
Arsenic (Dissolved)		
11/2012	22	PPB
11/2015	<2	BDL
2/2016	<2	BDL

SB/MW-15-14		
Arsenic (Total)		
9/2014	30	PPB
4/2015*	45	PPB
8/2015	23	PPB
11/2015	22	PPB
2/2016	12	PPB
Arsenic (Dissolved)		
8/2015	5	PPB
11/2015	21	PPB
2/2016	12	PPB

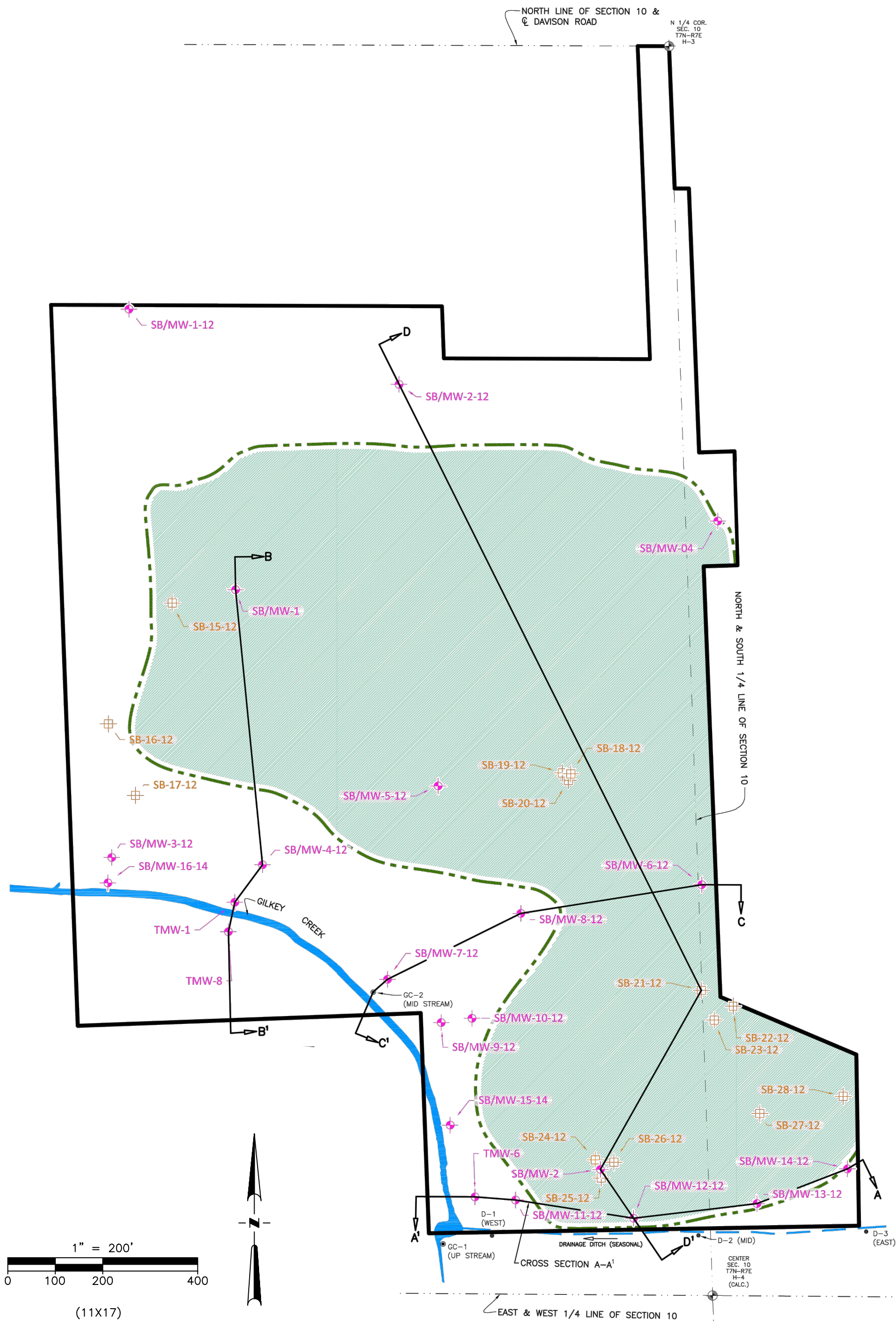
GC-1 (UP STREAM)		
Arsenic (Total)		
8/2012	–	NS
11/2012	3	< Criteria
4/2013	2	< Criteria
7/2013	6	< Criteria
9/2014	5	< Criteria
4/2015	–	NS
8/2015	–	NS
11/2015	–	NS
2/2016	–	NS

TMW-6		
Arsenic (Total)		
8/2012	9	< Criteria
11/2012	<2	BDL
4/2013	<2	BDL
7/2013	8	< Criteria
4/2015*	4	< Criteria
8/2015	4	< Criteria
11/2015	4	< Criteria
2/2016	<2	BDL
Arsenic (Dissolved)		
11/2015	4	< Criteria
2/2016	<2	BDL
Zinc		
8/2012	11	< Criteria
11/2012	21	< Criteria
4/2013	360	PPB
7/2013	65	< Criteria
9/2014	–	NA
8/2015	<5	BDL
11/2015	6	< Criteria
2/2016	7	< Criteria
Zinc (Dissolved)		
11/2015	<5	BDL
2/2016	<2	< Criteria

D-1 (WEST)		
Arsenic (Total)		
8/2012	–	NS
11/2012	–	NS
4/2013	<2	BDL
7/2013	–	NS
9/2014	–	NS
4/2015	–	NS
8/2015	–	NS
11/2015	–	NS
2/2016	–	NS

SB/MW-11-12		
-------------	--	--

CROSS SECTION LOCATION MAP



FIGURE

5A



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SCALE: 1" = 200'

RACER TRUST

DAVISON ROAD INDUSTRIAL LAND

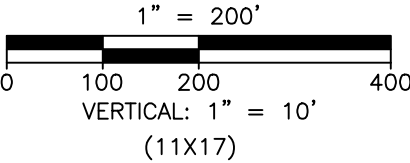
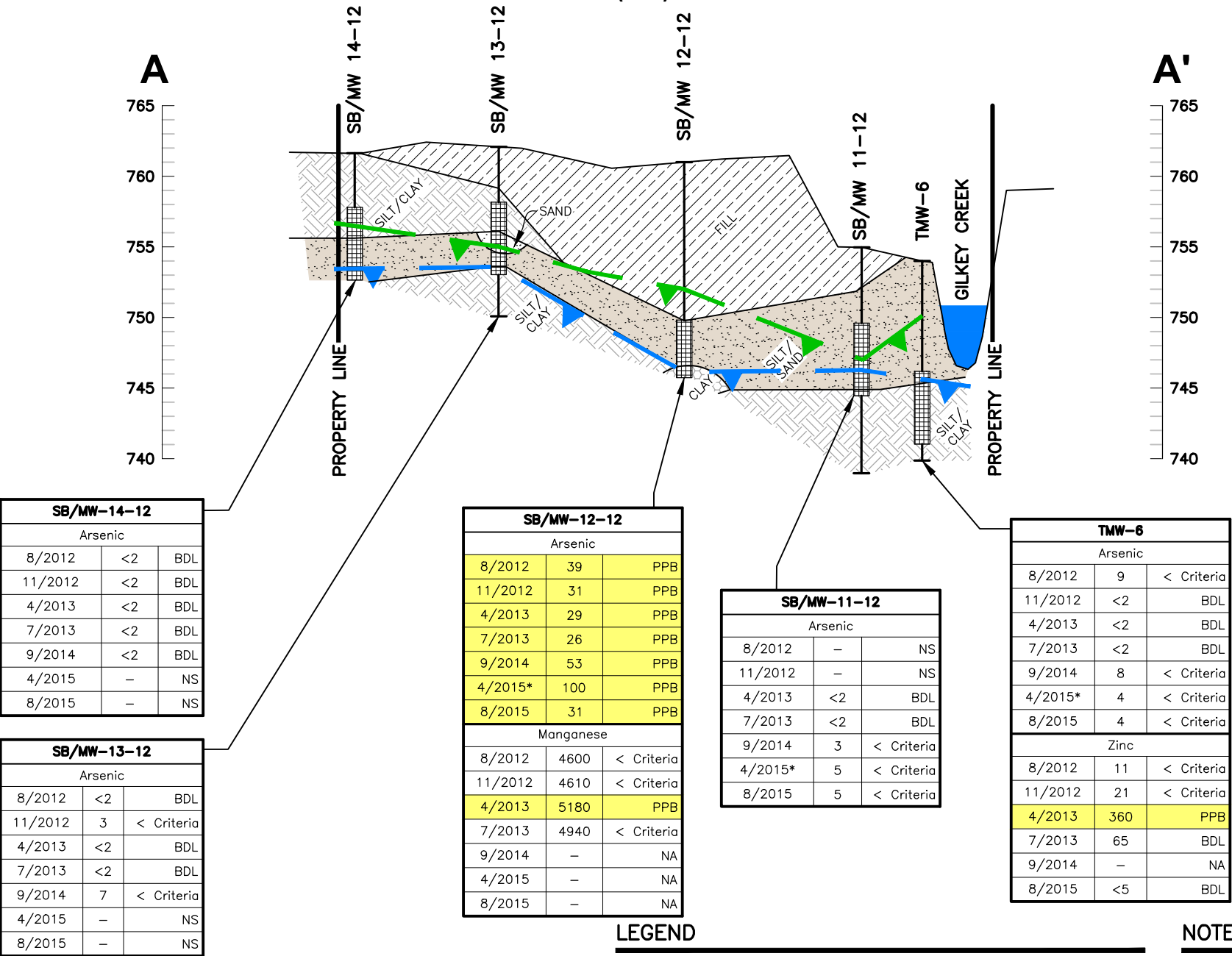
CROSS SECTION LOCATION MAP

JOB No. 12-068_5A.dwg

DR. BY: MA | DATE: 10/30/2015

CROSS SECTION

(A-A')



FIGURE

5B

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RACER TRUST

DAVISON ROAD INDUSTRIAL LAND

CROSS SECTION (A-A')

JOB No.12-068_5B thru 5D.dwg

DR. BY: MA DATE: 10/30/2015

SCALE: 1" = 200'

LEGEND

FILL

SILT(ST)/CLAY

SILT/SAND

CLAY(CY)

WELL SCREEN/WATER SAMPLE LOCATION

STATIC WATER ELEVATION DURING THE AUGUST 2015 GSI SAMPLE EVENT

WATER TABLE AT TIME OF DRILLING

8/2012 = SAMPLE DATE

51 PPB = CONCENTRATION (PARTS PER BILLION)

BDL = BELOW DETECTION LIMIT

< Criteria = BELOW GSI CRITERIA

NS = NOT SAMPLED

NA = NOT ANALYZED

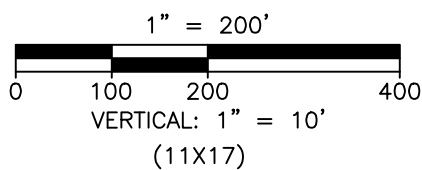
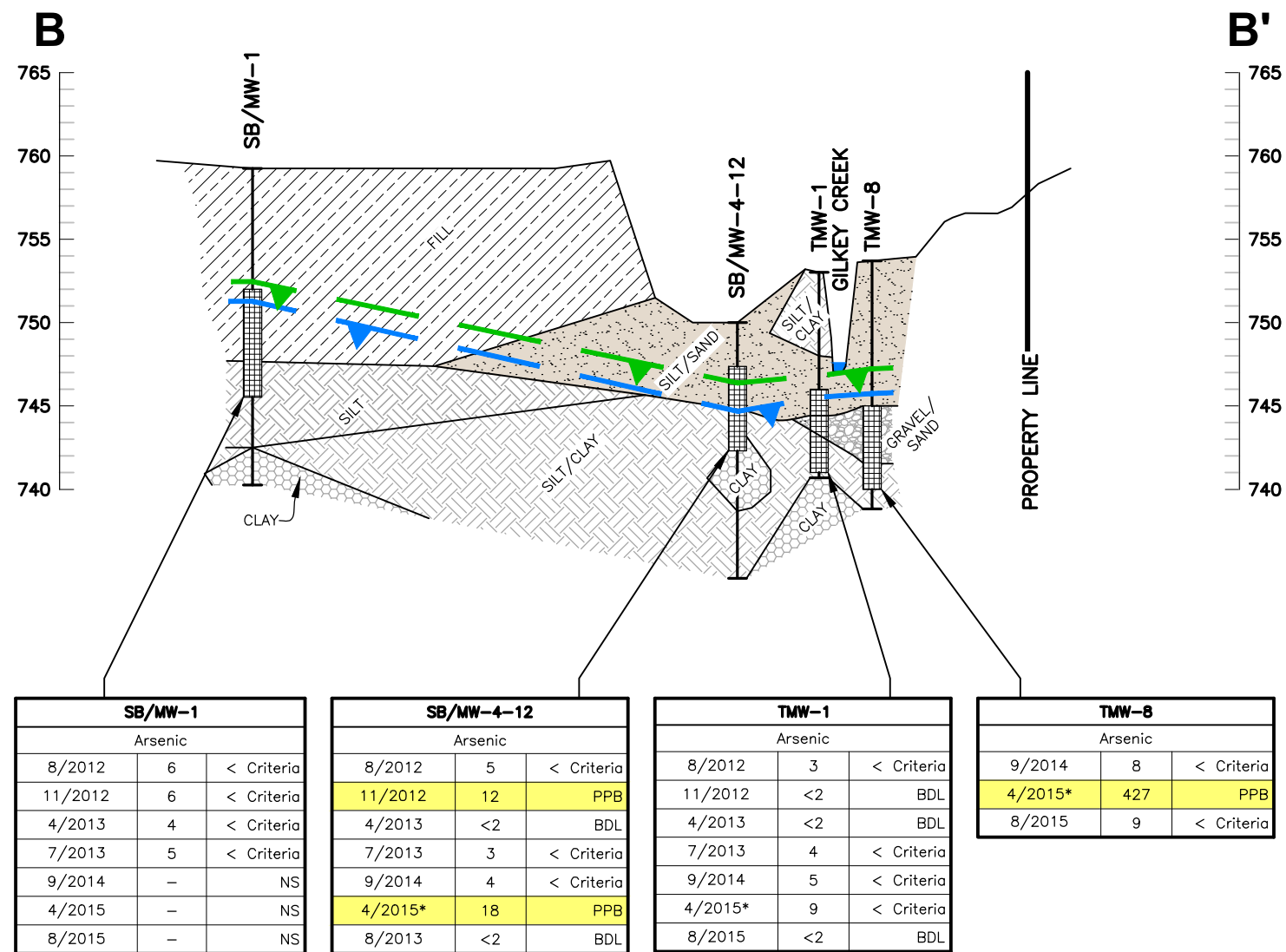
MW

DATE	#	< Criteria
DATE	##	PPB

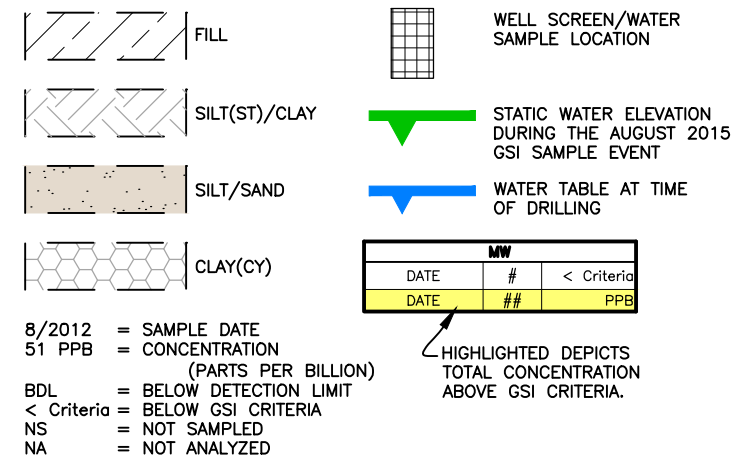
HIGHLIGHTED DEPICTS TOTAL CONCENTRATION ABOVE GSI CRITERIA.

- NOTES**
- Non-Residential Groundwater/Surface Water Interface (GSI) criteria for Arsenic 10 PPB/ug/l.
 - Calculated Facility specific part 201 GSI Criteria for (G) Footnoted Hazardous Substances
 - *Samples collected during the April 2015 sampling event were not collected using low flow sampling methodology and are not believed to be representative of ground water quality. Low flow sampling methodology was used during all other sampling events.
 - Samples collected during the August sampling event were additionally analyzed for dissolved arsenic &/or zinc – see analytical report for results.
- | Cadmium | 4.9 | PPB/ug/l | |
|-----------|------|----------|--|
| Manganese | 5000 | PPB/ug/l | |
| Zinc | 290 | PPB/ug/l | |
| Copper | 22 | PPB/ug/l | |

CROSS SECTION
(B-B')



LEGEND



NOTES

- Non-Residential Groundwater/Surface Water Interface (GSI) criteria for Arsenic 10 PPB/ug/l.
- Calculated Facility specific part 201 GSI Criteria for (G) Footnoted Hazardous Substances
Cadmium 4.9 PPB/ug/l
Manganese 5000 PPB/ug/l
Zinc 290 PPB/ug/l
Copper 22 PPB/ug/l
- *Samples collected during the April 2015 sampling event were not collected using low flow sampling methodology and are not believed to be representative of ground water quality. Low flow sampling methodology was used during all other sampling events.
- Samples collected during the August sampling event were additionally analyzed for dissolved arsenic &/or zinc – see analytical report for results.

FIGURE

5C



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RACER TRUST

DAVISON ROAD INDUSTRIAL LAND

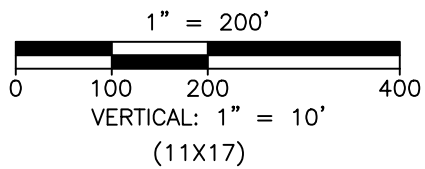
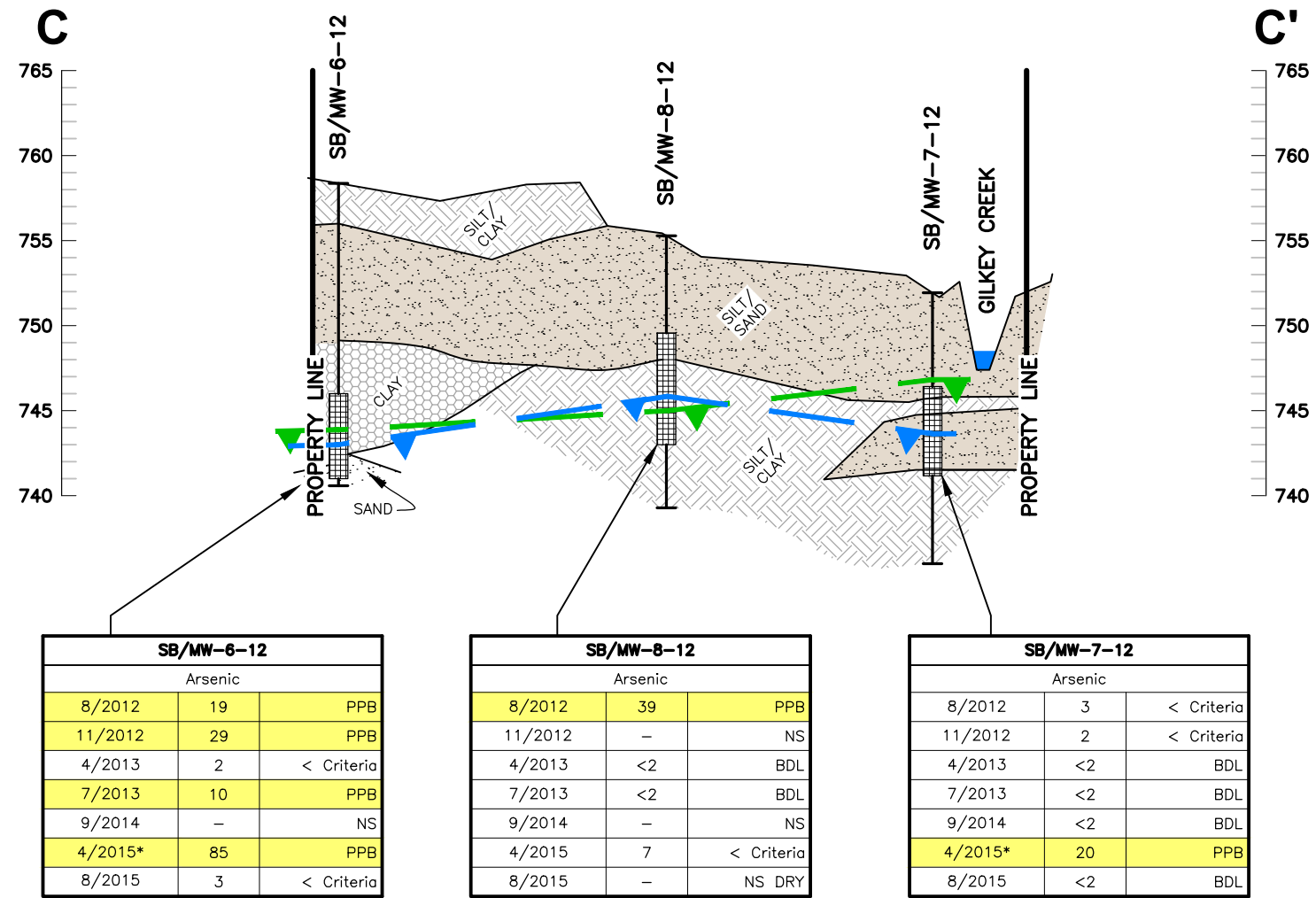
CROSS SECTION (B-B')

JOB No.12-068_5B thru 5D.dwg

DR. BY: MA DATE: 10/30/2015

SCALE: 1" = 200'

CROSS SECTION
(C-C')



FIGURE

5D

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DAVISON ROAD INDUSTRIAL LAND

CROSS SECTION (C-C')

JOB No.12-068_5B thru 5D.dwg

DR. BY: MA DATE: 10/30/2015

SCALE: 1" = 200'

LEGEND

FILL

SILT(ST)/CLAY

SILT/SAND

CLAY(CY)

WELL SCREEN/WATER SAMPLE LOCATION

STATIC WATER ELEVATION DURING THE AUGUST 2015 GSI SAMPLE EVENT

WATER TABLE AT TIME OF DRILLING

8/2012 = SAMPLE DATE
51 PPB = CONCENTRATION
(PARTS PER BILLION)
BDL = BELOW DETECTION LIMIT
< Criteria = BELOW GSI CRITERIA
NS = NOT SAMPLED
NA = NOT ANALYZED

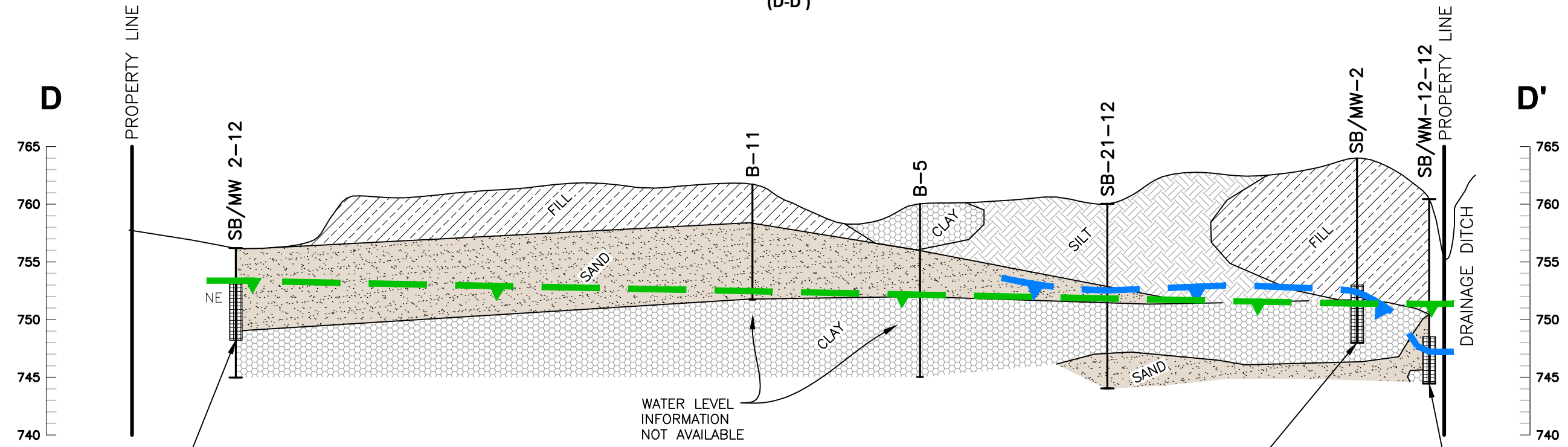
MW		
DATE	#	< Criteria
DATE	##	PPB

HIGHLIGHTED DEPICTS TOTAL CONCENTRATION ABOVE GSI CRITERIA.

NOTES

- Non-Residential Groundwater/Surface Water Interface (GSI) criteria for Arsenic 10 PPB/ug/l.
- Calculated Facility specific part 201 GSI Criteria for (G) Footnoted Hazardous Substances
Cadmium 4.9 PPB/ug/l
Manganese 5000 PPB/ug/l
Zinc 290 PPB/ug/l
Copper 22 PPB/ug/l
- *Samples collected during the April 2015 sampling event were not collected using low flow sampling methodology and are not believed to be representative of ground water quality. Low flow sampling methodology was used during all other sampling events.
- Samples collected during the August sampling event were additionally analyzed for dissolved arsenic &/or zinc – see analytical report for results.

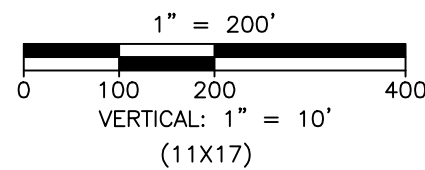
CROSS SECTION
(D-D')



SB/MW-2-12		
Arsenic		
8/2012	2	<Criteria
11/2012	<2	BDL
4/2013	<2	BDL
7/2013	<2	BDL
9/2014	-	NS
4/2015	-	NS
8/2015	-	NS

SB/MW-2		
Arsenic		
8/2012	102	PPB
11/2012	104	PPB
4/2013	15	PPB
7/2013	26	PPB
9/2014	-	NS
4/2015*	96	PPB
8/2015	97	PPB

SB/MW-12-12		
Arsenic		
8/2012	39	PPB
11/2012	31	PPB
4/2013	29	PPB
7/2013	26	PPB
9/2014	53	PPB
4/2015*	100	PPB
8/2015	31	PPB
Manganese		
8/2012	4600	< Criteria
11/2012	4610	< Criteria
4/2013	5180	PPB
7/2013	4940	< Criteria
9/2014	-	NA
4/2015	-	NA
8/2015	-	NA



LEGEND

FILL

SILT(ST)/CLAY

SILT/SAND

CLAY(CY)

WELL SCREEN/WATER SAMPLE LOCATION

STATIC WATER ELEVATION DURING THE AUGUST 2015 GSI SAMPLE EVENT

WATER TABLE AT TIME OF DRILLING

MW		
DATE	#	< Criteria
DATE	##	PPB

HIGHLIGHTED DEPICTS TOTAL CONCENTRATION ABOVE GSI CRITERIA.

8/2012 = SAMPLE DATE
51 PPB = CONCENTRATION (PARTS PER BILLION)

BDL = BELOW DETECTION LIMIT
< Criteria = BELOW GSI CRITERIA
NS = NOT SAMPLED
NA = NOT ANALYZED
NE = GW NOT ENCOUNTERED DURING DRILLING

NOTES

- Non-Residential Groundwater/Surface Water Interface (GSI) criteria for Arsenic 10 PPB/ug/l.
- Calculated Facility specific part 201 GSI Criteria for (G) Footnoted Hazardous Substances
Cadmium 4.9 PPB/ug/l
Manganese 5000 PPB/ug/l
Zinc 290 PPB/ug/l
Copper 22 PPB/ug/l
- *Samples collected during the April 2015 sampling event were not collected using low flow sampling methodology and are not believed to be representative of ground water quality. Low flow sampling methodology was used during all other sampling events.
- Samples collected during the August sampling event were additionally analyzed for dissolved arsenic &/or zinc - see analytical report for results.

FIGURE

5E

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RACER TRUST

DAVISON ROAD INDUSTRIAL LAND

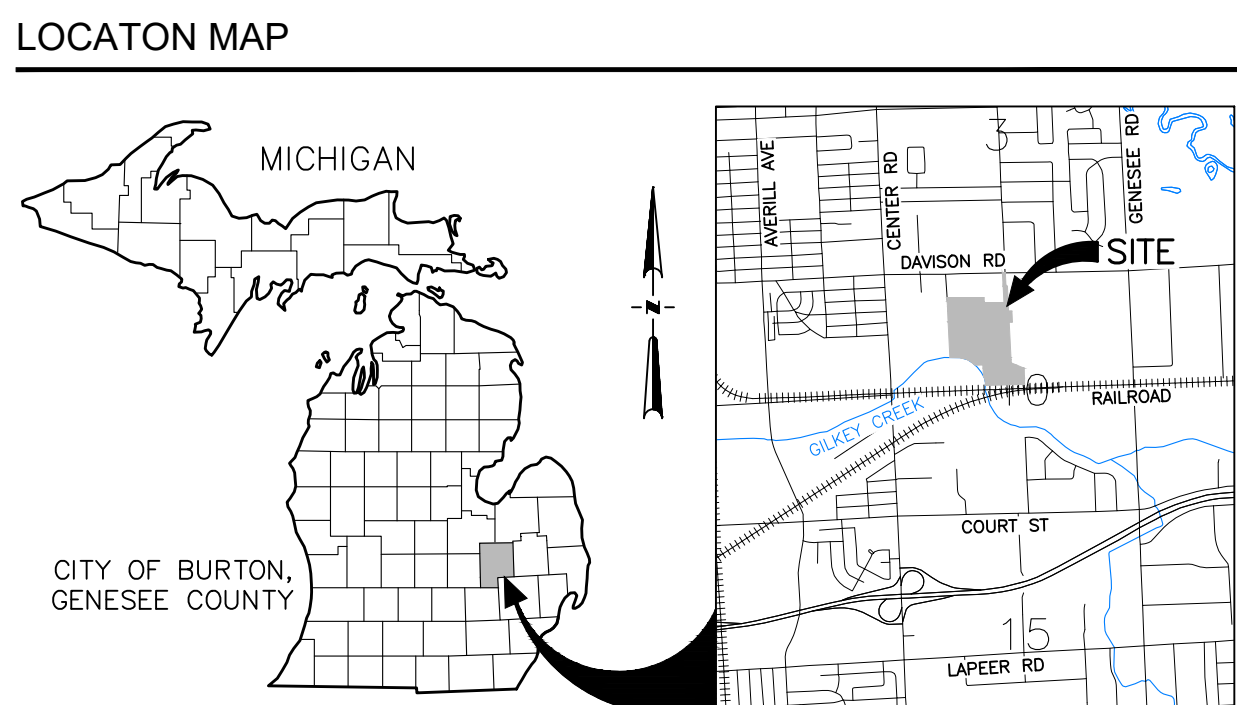
CROSS SECTION (D-D')

JOB No. 12-068_5E.dwg

DR. BY: MA DATE: 10/30/2015

SCALE: 1" = 200'





LEGEND

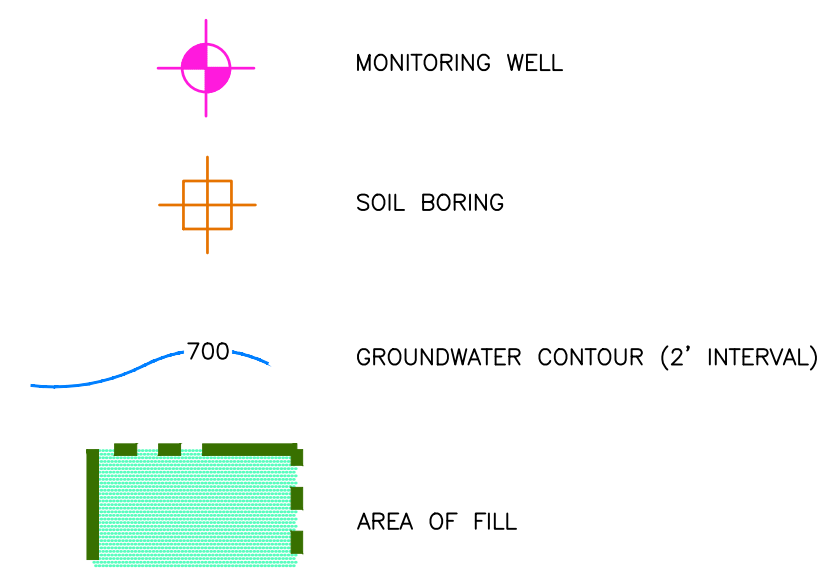


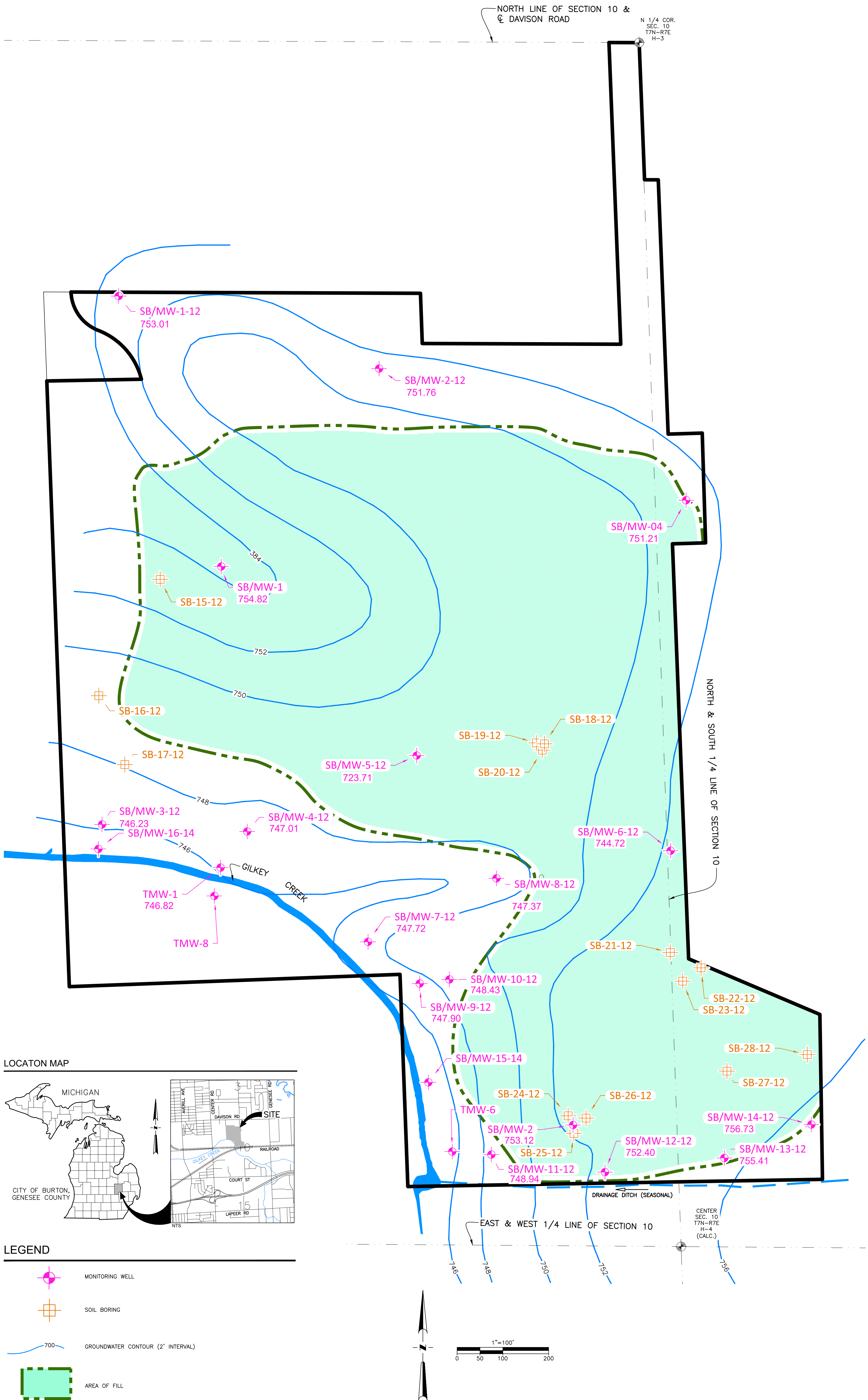
FIGURE 6B	DRWG. by : MA CHECK : DATE : 11/22/2013 DWG: 12-068_6A thru 6E	CONT. INT.: N/A FIELD : MD/SM/LB V. SCALE : N/A SCALE: 1"=150' JOB# :12-068	REVISIONS REVISED PER COMMENTS	DATE 8/30/16

GROUNDWATER GRADIENT MAP

NOVEMBER 2012
RACER TRUST
DAVISON ROAD INDUSTRIAL LAND – BURTON, MICHIGAN



FILE:Project\2012\12-068 Burton Rd RACER Trust Survey\Map 2016.mxd 17 page sat\12-068_6A thru 6E.dwg DATE:3/1/2016 8:20 AM



FILE:Project\2012\12-068 Burton Rd RACER TRUST Survey\Map 2016.dwg 17 page sat\12-068.dwg thru 66.dwg DATE:9/31/2016 8:20 AM

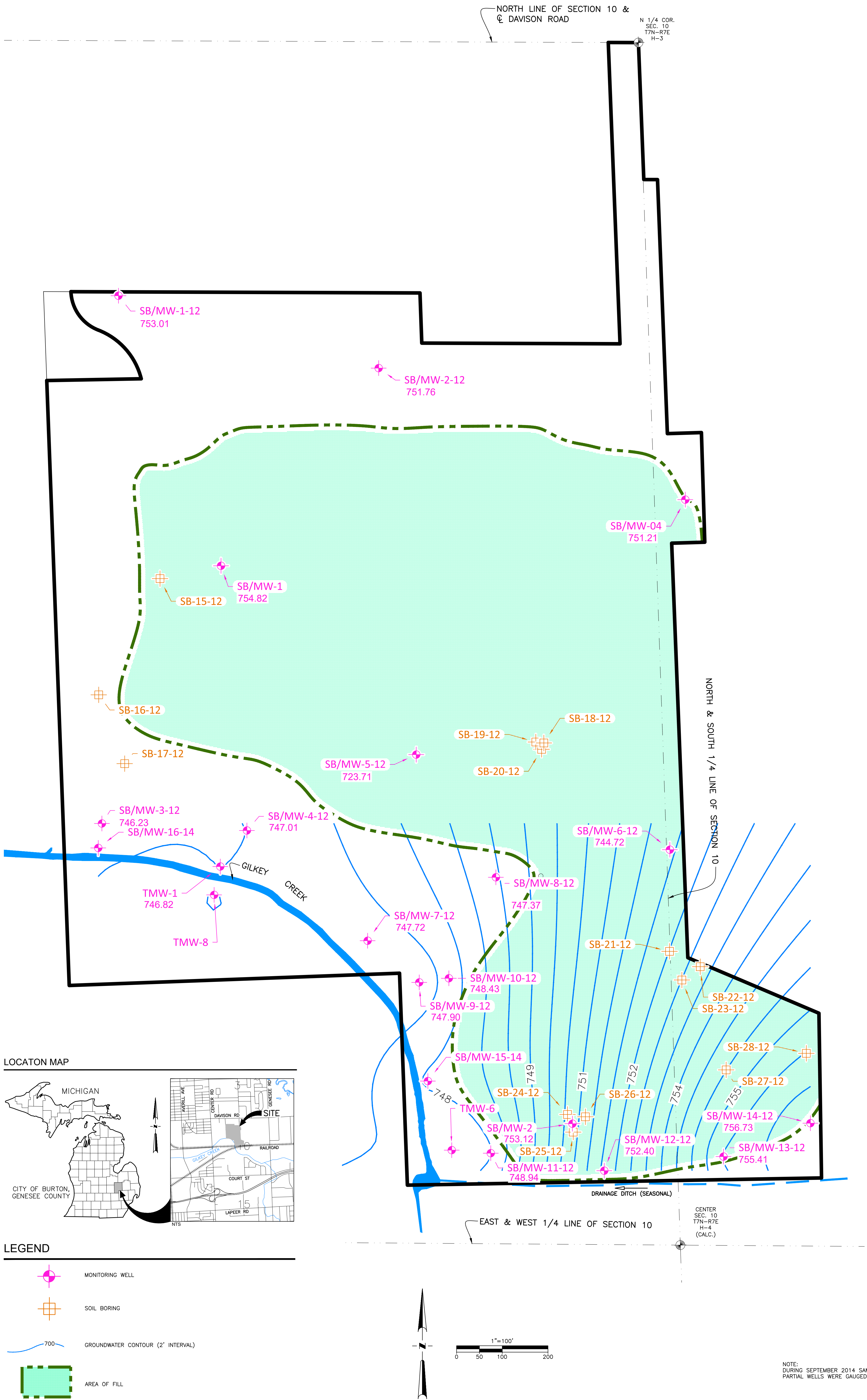


FIGURE
6E

DRWG. by : MA
CHECK :
DATE : 12/15/2014
DWG: 12-068_6A thru 6E

CONT. INT.: N/A
FIELD : MD/SM/LB
V. SCALE : N/A
SCALE: 1"=150'
JOB# :12-068

REVISIONS	DATE
FIELD LOCATED TMW-8	9/24/14
ADDED 2 NEW WELLS	11/14/14
REVISED PER COMMENTS	8/30/16

GROUNDWATER GRADIENT MAP

SEPTEMBER 2014
RACER TRUST
DAVISON ROAD INDUSTRIAL LAND - BURTON, MICHIGAN



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FILE:R:\Projects\2015\12-068 Burton Rd RACER Trust Survey Map 2016.mxd 17 pages sat\12-068_6F.dwg DATE:8/31/2016 8:28 AM

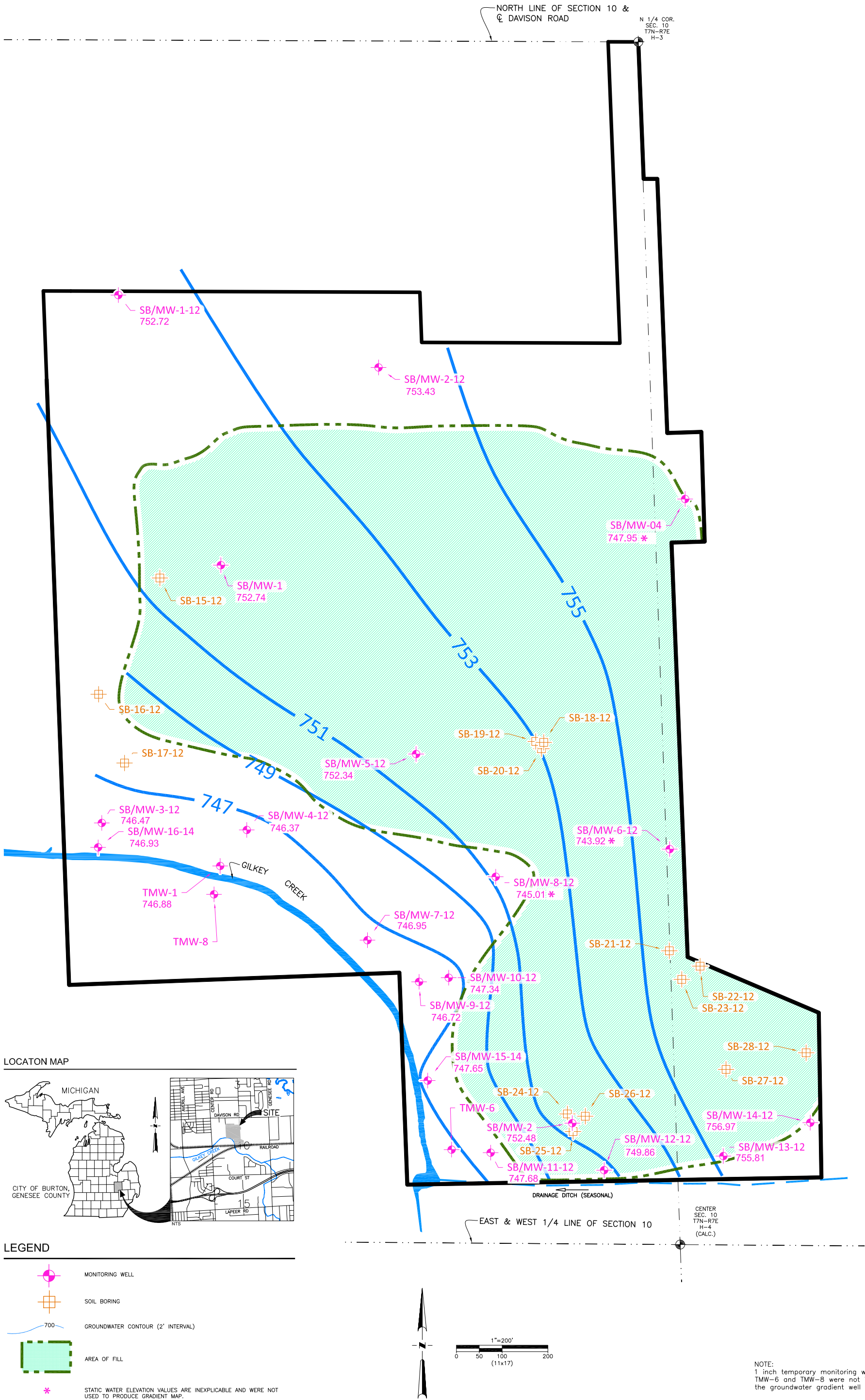


FIGURE
6F

DRWG. by : MA
CHECK :
DATE : 8/28/2015
DWG: 12-068_6F.dwg

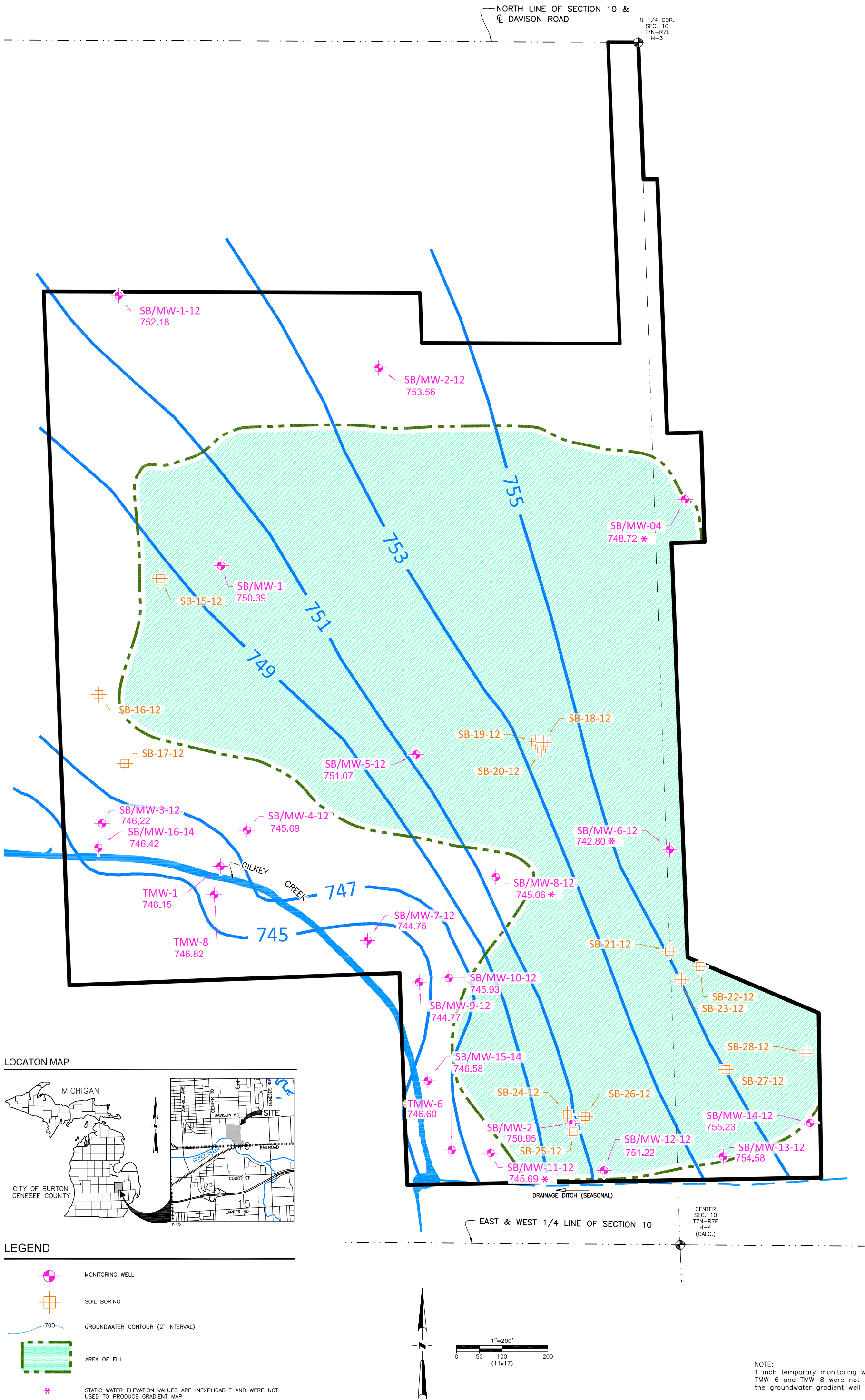
CONT. INT.: N/A
FIELD : MO/SM/LB
V. SCALE : N/A
SCALE: 1"=200'
JOB# : 12-068

REVISIONS	DATE
FIELD LOCATED TMW-8	9/24/14
ADDED 2 NEW WELLS	11/14/14
NEW SAMPLING DATA	6/17/15
REVISED PER COMMENTS	10/30/15
REVISED PER COMMENTS	8/30/16

GROUNDWATER GRADIENT MAP

AUGUST 2015
RACER TRUST
DAVISON ROAD INDUSTRIAL LAND- BURTON, MICHIGAN

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NOTE:
1 inch temporary monitoring wells TMW-1, TMW-6 and TMW-8 were not included in the groundwater gradient well network.

FIGURE
6G

DRWG. by : MA
CHECK :
DATE : 8/28/2015
DWG: 12-068_6G.dwg

CONT. INT.: N/A
FIELD : MD/SM/LB
V. SCALE : N/A
SCALE: 1"=200'
JOB# : 12-068

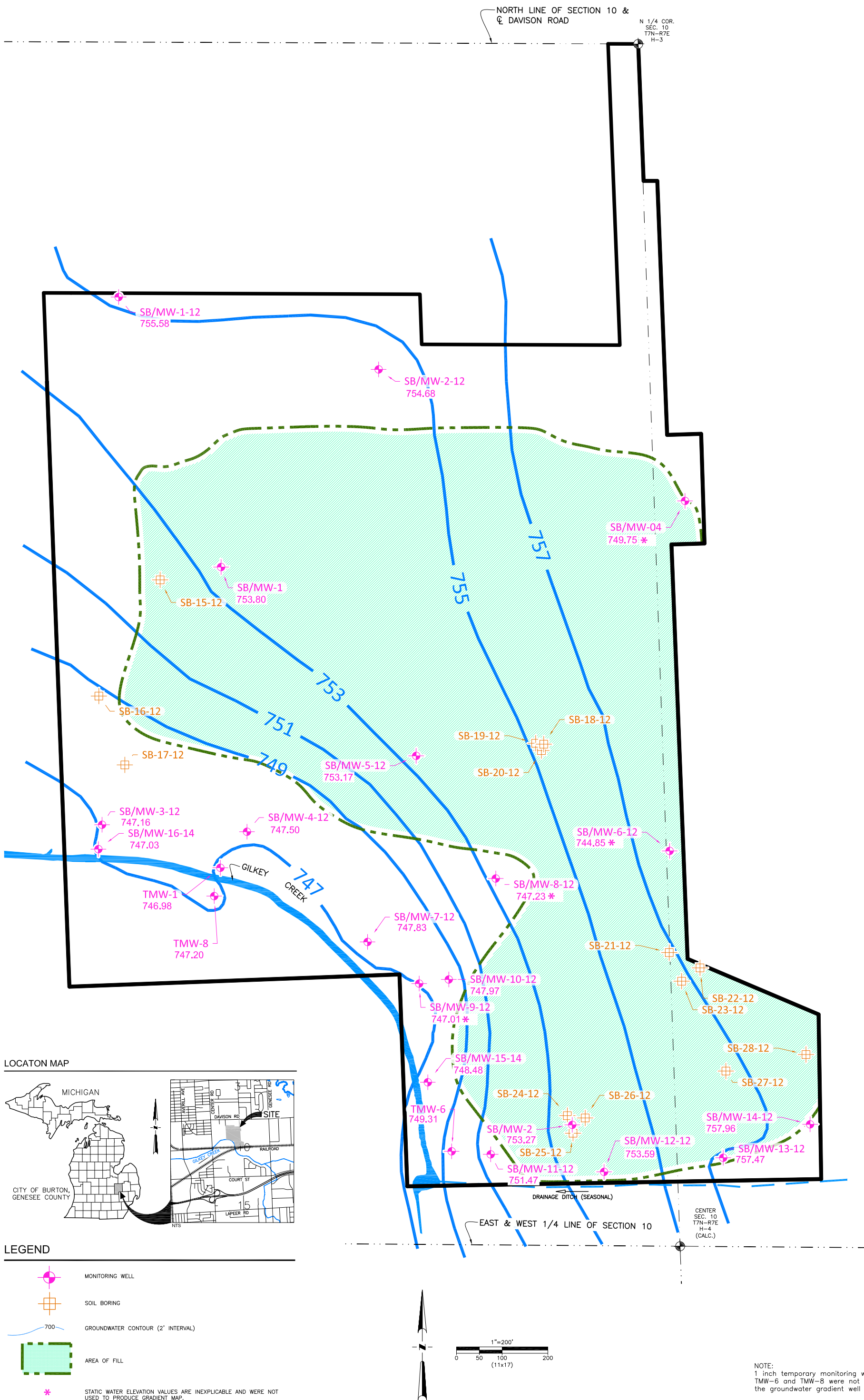
REVISIONS	DATE
FIELD LOCATED TMW-8	9/24/14
ADDED 2 NEW WELLS	11/14/14
NEW SAMPLING DATA	6/17/15
REVISED PER COMMENTS	10/30/15
REVISED PER COMMENTS	8/30/16

GROUNDWATER GRADIENT MAP

NOVEMBER 2015
RACER TRUST
DAVISON ROAD INDUSTRIAL LAND- BURTON, MICHIGAN

ERG Environmental Resources Group
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FILE:Project\2012\12-068 Burton Rd RACER Trust\DWG\SURVEY\Aug 2016.mxd 17 page sat\12-068_SHT.dwg DATE: 1/2016 10:03 AM



FILED:\Projects\2012\12-068 Davison Rd RACER Trust\Survey\Aug 2016\WMA-17-2009-wet-12-068_7-8.dwg DATE:8/31/2016 8:13 AM

DC-4-SO2 (MW-4-04-SO2)
(DETAIL)

DC-4-SO2 (MW-4-04-SO2)		
8/25/2015		
DEPTH	PNA's	CONCENTRATION
0-2'	B(a)a	500
	B(b)p	500
	B(b)f	1000
	B(k)f	1100
	B(ghi)p	300
	Chry	600
	Fluanth	1000
	Phen	600
	Pyr	900
	PNA's	BDL
2'-4'	B(b)f	600
4'-6'	B(k)f	600
	Fluanth	400
	Pyr	400
6'-8'	PNA's	BDL
8'-10'	Anth	700
	B(a)a	1500
	B(b)p	1300
	B(b)f	1400
	B(k)f	1300
	B(ghi)p	600
	Chry	1400
	Fluanth	3900
	I(1,2,3)p	600
	Phen	2200
	Pyr	2300
	PNA's	BDL

DC-11-10'		
8/25/2015		
DEPTH	PNA's	CONCENTRATION
0-2'	PNA's	BDL
2'-4'	B(a)f	500
4'-6'	PNA's	BDL
6'-8'	PNA's	BDL

DC-5A-10'		
6/21/2016		
DEPTH	PNA's	CONCENTRATION
6-8'	PNA's	BDL

DC-5-10'		
8/25/2015		
DEPTH	PNA's	CONCENTRATION
0-2'	B(b)f	400
	B(k)f	400
	Fluanth	400
2'-4'	PNA's	BDL
4'-6'	PNA's	BDL
	Acerap	22000
	Anth	36700
	B(a)p	47400
	B(b)f	106200
	B(k)f	112600
	B(ghi)p	9900
	Chry	50100
	Di(ah)a	3300
	Fluanth	143300
	Flu	18500
	I(123)p	11500
	Naph	21800
	Phen	124400
	Pyr	125700
	2-Meth	3300
	1-Meth	1900
	B(a)a	53800
8'-10'	B(b)f	700
	B(k)f	700
	Fluanth	700

DC-6-15'		
8/25/2015		
DEPTH	PNA's	CONCENTRATION
0-2'	PNA's	BDL
2'-4'	PNA's	BDL
4'-6'	PNA's	BDL
6'-8'	PNA's	BDL
8'-10'	PNA's	BDL

DC-3-10'		
8/25/2015		
DEPTH	PNA's	CONCENTRATION
0-2'	B(a)a	500
	B(b)p	500
	B(b)f	1200
	B(k)f	1200
	Chry	600
	Fluanth	1200
	Phen	800
2'-4'	Pyr	1000
	B(a)a	300
	B(a)p	400
	B(b)f	800
	B(k)f	800
	Chry	400
	Fluanth	700
4'-6'	Phen	400
	Pyr	600
	Anth	700
	B(a)a	1100
	B(b)p	900
	B(b)f	1800
	B(k)f	1900
	B(ghi)p	300
	Chry	1200
	Fluanth	25000
	Flu	400
6'-8'	PNA's	BDL
8'-10'	PNA's	BDL

DC-8-10'		
8/25/2015		
DEPTH	PNA's	CONCENTRATION
0-2'	PNA's	BDL
2'-4'	PNA's	BDL
4'-6'	PNA's	BDL
6'-8'	PNA's	BDL
8'-10'	PNA's	BDL

DC-5B-10'		
6/21/2016		
DEPTH	PNA's	CONCENTRATION
6-8'	PNA's	BDL

NOTE

ALL CONCENTRATIONS IN PARTS PER BILLION.
PNAs - ONLY PNAs DETECTED ARE LISTED IN THE TABLES.
BDL - ALL PNAs ARE BELOW THE LABORATORY DETECTION LIMIT.
N/A - SAMPLES NOT ANALYZED.

LEGEND

10' 10' 10' 10' APPROXIMATE AREA OF PNAs IMPACTED SOIL ABOVE THE DC CRITERIA
■ SOIL BORING INSTALLED IN 2004
● SOIL BORING LOCATIONS

DC		
DATE	#	< Criteria
DATE	##	PPB

HIGHLIGHTED DEPICTS PNAs CONCENTRATION ABOVE DC CRITERIA.

LEGEND

SAMPLE DATE		
NAME	ABBREVIATION	DC CRITERIA* #
Acenaphthene	Acenap	1.30 e+8
Anthracene	B(k)f	7.3
Benzo(a)anthracene	B(a)a	80,000
Benzo(a)pyrene	B(a)p	8,000
Benzo(b)fluoranthene	B(b)f	80,000
Benzo(k)fluoranthene	B(k)f	8.0 e+8
Benzo(ghi)perylene	B(ghi)p	7.0 e+6
Chrysene	Chry	8.0 e+6
Dibenzo(ah)anthracene	Di(ah)a	8,000
Fluoranthene	Fluanth	1.30 e+8
Flourene	Fluo	8.70 e+7
Indeno(1,2,3-cd)pyrene	I(1,2,3)p	80,000
Naphthalene	Naph	5.20 e+7
Phenanthrene	Phen	5.20 e+6
Pyrene	Pyr	7.3 e+5
2-Methylnaphthalene	2-Meth	2.6 e+7
1-Methylnaphthalene	1-Meth	NLL

* MDEQ PART 201 NON-RES. DIRECT CONTACT SOIL CLEAN UP CRITERIA:

DIRECT CONTACT INVESTIGATION DC-4-SO2

SOIL ANALYTICAL RESULTS
RACER TRUST
DAVISON ROAD INDUSTRIAL LAND- BURTON, MICHIGAN



FIGURE 7

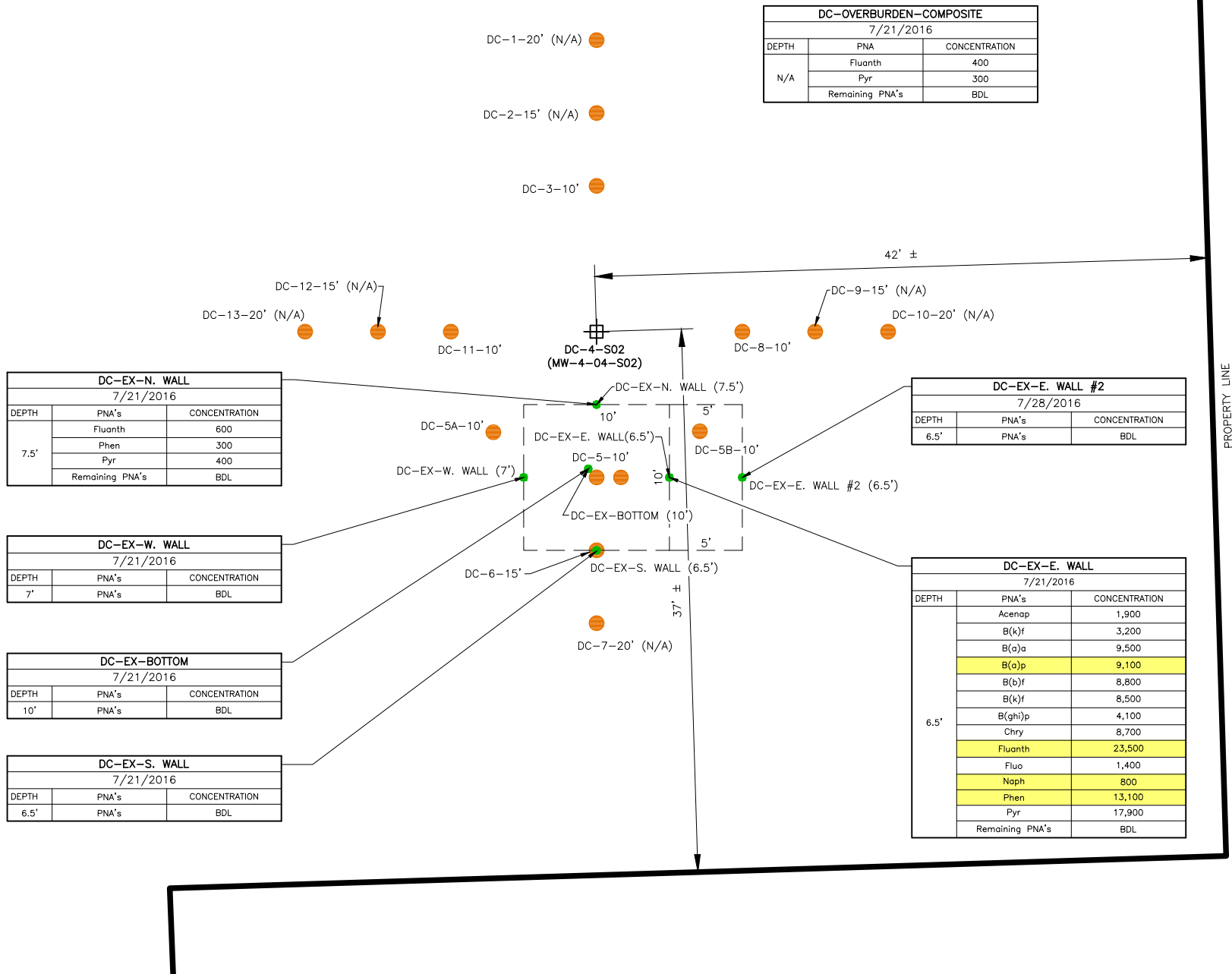
DRWG. by :MA,DC
CHECK :
DATE : 8/8/2016
DWG: 12-068_7-8.dwg

CONT. INT.: N/A
FIELD : MD/SM/LB
V. SCALE : N/A
SCALE: 1"=5'
JOB# : 12-068

REVISED PER COMMENTS	8/30/16

FILED:\Projects\2012\12-068 Davison Rd RACER Trust\Survey\Aug 2016\Whole 17.dwg 17:40:00 8/21/2016 8/21/2016

DIRECT CONTACT EXCAVATION SOIL VERIFICATION ANALYTICAL MAP
DC-4-SO2 (MW-4-04-SO2)



NOTE

ALL CONCENTRATIONS IN PARTS PER BILLION.

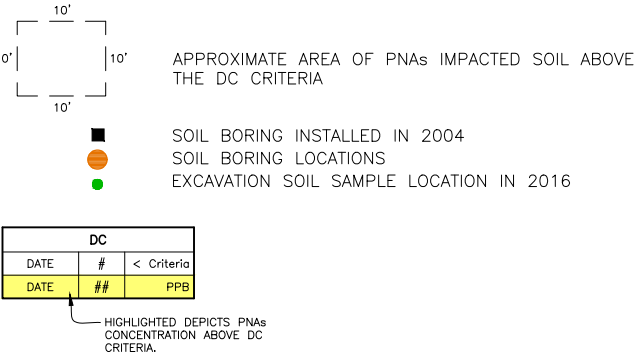
PNAs - ONLY PNAs DETECTED ARE LISTED IN THE TABLES.

BDL - ALL PNAs ARE BELOW THE LABORATORY DETECTION LIMIT.

N/A - SAMPLES NOT ANALYZED.

* OVERBURDENED SOILS USED TO BACKFILL UPPER 6 FEET OF EXCAVATION

LEGEND



LEGEND

SAMPLE DATE		
NAME	ABBREVIATION	DC CRITERIA* #
Acenaphthene	Acenap	1.30 e+8
Anthracene	B(k)f	7.3
Benzo(a)anthracene	B(a)a	80,000
Benzo(a)pyrene	B(a)p	8,000
Benzo(b)fluoranthene	B(b)f	80,000
Benzo(k)fluoranthene	B(k)f	8.0 e+8
Benzo(ghi)perylene	B(ghi)p	7.0 e+6
Chrysene	Chry	8.0 e+6
Dibenzo(ah)anthracene	Di(ah)a	8,000
Fluoranthene	Fluanth	1.30 e+8
Flourene	Fluo	8.70 e+7
Indeno(1,2,3-cd)pyrene	I(1,2,3)p	80,000
Naphthalene	Naph	5.20 e+7
Phenanthrene	Phen	5.20 e+6
Pyrene	Pyr	7.3 e+5
2-Methylnaphthalene	2-Meth	2.6 e+7
1-Methylnaphthalene	1-Meth	NLL

* MDEQ PART 201 NON-RES. DIRECT CONTACT SOIL CLEAN UP CRITERIA:

FIGURE
8

DRWG. by :MAJDC
CHECK :
DATE : 8/8/2016
DWG: 12-068_7-8.dwg

CONT. INT.: N/A
FIELD : MD/SM/LB
V. SCALE : N/A
SCALE: 1"=5'
JOB# : 12-068

REVISED PER COMMENTS	8/30/16

DC EXC. SOIL VERIFICATION ANALYTICAL MAP

SOIL ANALYTICAL RESULTS
RACER TRUST
DAVISON ROAD INDUSTRIAL LAND- BURTON, MICHIGAN

ERG Environmental Resources Group
28003 Center Oaks Court • Suite 106 • Wixom, MI • 48393
Phone: 248-773-7986 • Fax: 248-924-3108

ATTACHMENT B

TABLES

Table 1A
Soil Analytical Results-VOCs
RACER Trust - Davison Road Industrial Land
Burton, MI
Revised 8/16

Sample ID	Non-Residential Drinking Water Protection Criteria and RBSLs	Non-Res Groundwater Surface Water Interface Protection Criteria and RBSLs	Non-Res Groundwater Contact Protection Criteria and RBSLs	Non-Residential Direct Contact Criteria and RBSLs	SB/MW-1-12	SB/MW-2-12	SB/MW-3-12	SB/MW-4-12	SB/MW-4-12	SB/MW-5-12	SB/MW-6-12	SB/MW-7	SB/MW-8
Sample Depth					(7'-7.5')	(14'-15')	(3'-4')	(2'-3')	(2'-3') DUP	(9'10')	(14'-15')	(4'-5')	(5'-6')
Sample Date					07/17/2012	07/16/2012	07/19/2012	07/19/2012	07/19/2012	07/20/2012	07/17/2012	07/19/2012	07/18/2012
Volatiles, VOCs ug/Kg													
Ethylbenzene (I)	1,500	360	1.4E+5 (C)	1.4E+5 (C)	<70	<70	<60	<70	<80	<60	<100	<80	<70
Naphthalene	1.05E+05	730	2.10E+06	5.20E+07	<470	<490	<380	<460	<500	660	<880	<520	<430
Styrene	2,700	2,100 (X)	270,000	520000	<70	<70	<60	<70	<80	<60	<100	<80	<70
Tetrachloroethylene	100	1,200 (X)	88,000 (c)	88,000 (c)	<70	<70	<60	<70	<80	<60	<100	<80	<70
Trichloroethylene	100	4,000 (X)	4.40E+05	5.0E+5 (C,DD)	<70	<70	<60	<70	<80	<60	<100	<80	<70

Analytical results compared to the MDEQ Part 201 Non-Residential Cleanup Criteria
Results in parts per billion (ppb)/micrograms per kilograms (ug/kg)

Bold-exceeds the MDEQ Part 201 Non Residential Drinking Water
Shaded-Exceeds Non-Residential GSI Criteria
Italic-Exceeds Groundwater Protection Criteria
Exceeds the Non-Residential Direct Contact Criteria

NS - Not Sampled
NA - Not Analyzed or Not Applicable

Note: Includes analytes with concentrations above the Non Residential cleanup criteria only.

Table 1A
Soil Analytical Results-VOCs
RACER Trust - Davison Road Industrial Land
Burton, MI
Revised 8/16

Sample ID	Non-Residential Drinking Water Protection Criteria and RBSLs	Non-Res Groundwater Surface Water Interface Protection Criteria and RBSLs	Non-Res Groundwater Contact Protection Criteria and RBSLs	Non-Residential Direct Contact Criteria and RBSLs	SB/MW-9	SB/MW-10	SB/MW-11-12	SB/MW-12-12	SB/MW-13-12	SB/MW-14-12	SB-15-12	SB/MW-15-14	SB-16-12
Sample Depth					(6'-8')	(2'-3')	(6'-7')	(8.5'-9.5')	(0.5'-1.5')	(6.5'-7')	(11'-12')	(7.5-9.5')	(5'-6')
Sample Date					07/18/2012	07/18/2012	07/19/2012	07/17/2012	07/17/2012	07/17/2012	07/20/2012	9/23/2014	07/19/2012
Volatiles, VOCs ug/Kg													
Ethylbenzene (I)	1,500	360	1.4E+5 (C)	1.4E+5 (C)	<70	<80	<70	<200	<200	<100	<70	<70	<80
Naphthalene	1.05E+05	730	2.10E+06	5.20E+07	<470	<500	<460	<1,300	<1,100	<880	<450	<430	<530
Styrene	2,700	2,100 (X)	270,000	520000	<70	<80	<70	<200	<200	<100	<70	<70	<80
Tetrachloroethylene	100	1,200 (X)	88,000 (c)	88,000 (c)	<70	<80	<70	<200	<200	<100	<70	<70	<80
Trichloroethylene	100	4,000 (X)	4.40E+05	5.0E+5 (C,DD)	<70	<80	<70	<200	<200	<100	<70	<70	<80

Analytical results compared to the MDEQ Part 201 Non-Residential Cleanup Criteria
Results in parts per billion (ppb)/micrograms per kilograms (ug/kg)

Bold-exceeds the MDEQ Part 201 Non Residential Drinking Water

Shaded-Exceeds Non-Residential GSI Criteria

Italic-Exceeds Groundwater Protection Criteria

Exceeds the Non-Residential Direct Contact Criteria

NS - Not Sampled
NA - Not Analyzed or Not Applicable

Note: Includes analytes with concentrations above the Non Residential cleanup criteria only.

Table 1A
Soil Analytical Results-VOCs
RACER Trust - Davison Road Industrial Land
Burton, MI
Revised 8/16

Sample ID	Non-Residential Drinking Water Protection Criteria and RBSLs	Non-Res Groundwater Surface Water Interface Protection Criteria and RBSLs	Non-Res Groundwater Contact Protection Criteria and RBSLs	Non-Residential Direct Contact Criteria and RBSLs	SB/MW-16-14	SB-17-12	SB-18-12	SB-18-12	SB-18-12	SB-19-12	SB-20-12	SB-21-12	SB-22-12
Sample Depth					(6'-7') 9/23/2014	(2'-2.5') 07/19/2012	(2'-3') 07/20/2012	(8'-9') 07/20/2012	(8'-9') DUP 07/20/2012	(3'-4') 07/20/2012	(1'-2') 07/20/2012	(0'-2') 07/17/2012	(2'-3') 07/17/2012
Sample Date													
Volatiles, VOCs ug/Kg													
Ethylbenzene (l)	1,500	360	1.4E+5 (C)	1.4E+5 (C)	NA	<70	<50	<70	<70	<60	<60	<200	<200
Naphthalene	1.05E+05	730	2.10E+06	5.20E+07	NA	<440	<360	<430	<460	<400	<380	<1,500	<1,200
Styrene	2,700	2,100 (X)	270,000	520000	NA	<70	<50	<70	<70	<60	<60	<200	<200
Tetrachloroethylene	100	1,200 (X)	88,000 (c)	88,000 (c)	NA	<70	<50	<70	<70	<60	<60	<200	<200
Trichloroethylene	100	4,000 (X)	4.40E+05	5.0E+5 (C,DD)	NA	<70	<50	<70	<70	<60	<60	<200	<200

Analytical results compared to the MDEQ Part 201 Non-Residential Cleanup Criteria
Results in parts per billion (ppb)/micrograms per kilograms (ug/kg)

Bold-exceeds the MDEQ Part 201 Non Residential Drinking Water
Shaded-Exceeds Non-Residential GSI Criteria
Italic-Exceeds Groundwater Protection Criteria
Exceeds the Non-Residential Direct Contact Criteria

NS - Not Sampled
NA - Not Analyzed or Not Applicable

Note: Includes analytes with concentrations above the Non Residential cleanup criteria only.

Table 1A
Soil Analytical Results-VOCs
RACER Trust - Davison Road Industrial Land
Burton, MI
Revised 8/16

Sample ID	Non-Residential Drinking Water Protection Criteria and RBSLs	Non-Res Groundwater Surface Water Interface Protection Criteria and RBSLs	Non-Res Groundwater Contact Protection Criteria and RBSLs	Non-Residential Direct Contact Criteria and RBSLs	SB-23-12	SB-24-12	SB-25-12	SB-26-12	SB-27-12	SB-27-12	SB-28-12
Sample Depth					(1.5'-2.5')	(3'-4')	(11'-12')	(7'-8')	(2'-3')	(6'-7')	(2'-3')
Sample Date					07/17/2012	07/16/2012	07/17/2012	07/16/2012	07/20/2012	07/20/2012	07/19/2012
Volatiles, VOCs ug/Kg											
Ethylbenzene (I)	1,500	360	1.4E+5 (C)	1.4E+5 (C)	<200	<60	1,280	<80	70	<70	<70
Naphthalene	1.05E+05	730	2.10E+06	5.20E+07	<1,300	<400	<510	1,890	490	<480	<430
Styrene	2,700	2,100 (X)	270,000	520000	<200	<60	9,150	<80	<60	<70	<70
Tetrachloroethylene	100	1,200 (X)	88,000 (c)	88,000 (c)	<200	<60	<80	<80	1,710	<70	<70
Trichloroethylene	100	4,000 (X)	4.40E+05	5.0E+5 (C,DD)	<200	<60	<80	<80	130	<70	<70

Analytical results compared to the MDEQ Part 201 Non-Residential Cleanup Criteria
Results in parts per billion (ppb)/micrograms per kilograms (ug/kg)

Bold-exceeds the MDEQ Part 201 Non Residential Drinking Water

Shaded-Exceeds Non-Residential GSI Criteria

Italic-Exceeds Groundwater Protection Criteria

Exceeds the Non-Residential Direct Contact Criteria

NS - Not Sampled
NA - Not Analyzed or Not Applicable

Note: Includes analytes with concentrations above the Non Residential cleanup criteria only.

Guidesheet Number →		#11	#12	#13	#27								
Sample ID	Chemical Abstract Service Number	Non-Residential Drinking Water Protection Criteria and RBSLs	Non-Residential Groundwater Surface Water Interface Protection Criteria and RBSLs	Non-Residential Groundwater Contact Protection Criteria and RBSLs	Non-Residential Direct Contact Criteria and RBSLs	Sample Location	SB/MW-1-12	SB/MW-2-12	SB/MW-3-12	SB/MW-4-12	SB/MW-4-12	SB/MW-5-12	SB/MW-6-12
Sample Depth						Collection Date	(7'-7.5')	(14'-15')	(3'-4')	(2'-3')	(2'-3') DUP	(9'10')	(14'-15')
Sample Date							07/17/2012	07/16/2012	07/19/2012	07/19/2012	07/19/2012	07/20/2012	07/17/2012
Semi volatiles, PNAs ug/Kg													
Acenaphthene	83-32-9	3.0E+5	8,700	9.7E+5	1.3E+8		<330	<330	<330	<330	<330	<330	<330
Acenaphthylene	208-96-8	5,900	ID	4.4E+5	5.2E+6		<330	<330	<330	<330	<330	<330	<330
Anthracene	120-12-7	41,000	ID	41,000	7.3E+8		<330	<330	<330	<330	<330	<330	<330
Benzo(a)anthracene (Q)	56-55-3	NLL	NLL	NLL	80,000		<330	<330	<330	<330	<330	<330	<330
Benzo(a)pyrene (Q)	50-32-8	NLL	NLL	NLL	8,000		<330	<330	<330	<330	<330	<330	<330
Benzo(b)fluoranthene (Q)	205-99-2	NLL	NLL	NLL	80,000		<330	<330	<330	<330	<330	<330	<330
Benzo(g,h,i)perylene	191-24-2	NLL	NLL	NLL	7.0E+6		<330	<330	<330	<330	<330	<330	<330
Benzo(k)fluoranthene (Q)	207-08-9	NLL	NLL	NLL	8.0E+5		<330	<330	<330	<330	<330	<330	<330
Chrysene (Q)	218-01-9	NLL	NLL	NLL	8.0E+6		<330	<330	<330	<330	<330	<330	<330
Dibenzo(a,h)anthracene (Q)	53-70-3	NLL	NLL	NLL	8,000		<330	<330	<330	<330	<330	<330	<330
Fluoranthene	206-44-0	7.3E+5	5,500	7.3E+5	1.3E+8		<330	<330	<330	<330	<330	<330	<330
Fluorene	86-73-7	3.9E+5	5,300	8.9E+5	8.7E+7		<330	<330	<330	<330	<330	<330	<330
Indeno(1,2,3-cd)pyrene (Q)	193-39-5	NLL	NLL	NLL	80,000		<330	<330	<330	<330	<330	<330	<330
2-Methylnaphthalene	91-57-6	57,000	4,200	5.5E+6	2.6E+7		NA	NA	NA	NA	NA	NA	NA
1-Methylnaphthalene	90-12-0	NLL	NLL	NLL	NLL		NA	NA	NA	NA	NA	NA	NA
Naphthalene	91-20-3	35,000	730	2.1E+6	5.2E+7		<330	<330	<330	<330	<330	<330	<330
Phenanthrene	85-01-8	56,000	2,100	1.1E+6	5.2E+6		<330	<330	<330	<330	<330	<330	<330
Pyrene	129-00-0	4.8E+5	ID	4.8E+5	8.4E+7		<330	<330	<330	<330	<330	<330	<330

Analytical results compared to the MDEQ Part 201 Non-Residential Cleanup Criteria
Results in parts per billion (ppb)/micrograms per liter (ug/mg)

Bold-exceeds the MDEQ Part 201 Non Residential Drinking Water Criteria

Shaded-Exceeds Non-Residential GSI Criteria

Italic-Exceeds Groundwater Protection Criteria

Green & Underline -Exceeds Non-Residential Direct Contact Criteria

NS - Not Sampled

NA - Not Analyzed or Not Applicable

Note: Includes analytes with concentrations above the Non Residential cleanup criteria only.

Table 1B
Soil Analytical Results-PNAs/SVOCs
RACER Trust - Davison Road Industrial Land
Burton, MI
Revised 8/16

Guidesheet Number →		#11	#12	#13	#27									
Sample ID	Chemical Abstract Service Number	Non-Residential Drinking Water Protection Criteria and RBSLs	Non-Residential Groundwater Surface Water Interface Protection Criteria and RBSLs	Non-Residential Groundwater Contact Protection Criteria and RBSLs	Non-Residential Direct Contact Criteria and RBSLs	Sample Location	SB/MW-7-12	SB/MW-8-12	SB/MW-9-12	SB/MW-10-12	Duplicate 1	SB/MW-11-12	SB/MW-12-12	SB/MW-13-12
Sample Depth						Collection Date	(4'-5')	(5'-6')	(6-8')	(2-3')		(6'-7')	(8.5'-9.5')	(0.5'-1.5')
Sample Date							07/19/2012	07/18/2012	07/18/2012	07/18/2012	07/16/2012	07/19/2012	07/17/2012	07/17/2012
<i>Semi volatiles, PNAs ug/Kg</i>														
Acenaphthene	83-32-9	3.0E+5	8,700	9.7E+5	1.3E+8		<330	<330	<330	<330	<300	<330	<330	<330
Acenaphthylene	208-96-8	5,900	ID	4.4E+5	5.2E+6		<330	<330	<330	<330	<300	<330	<330	<330
Anthracene	120-12-7	41,000	ID	41,000	7.3E+8		<330	<330	<330	<330	<300	<330	<330	<330
Benzo(a)anthracene (Q)	56-55-3	NLL	NLL	NLL	80,000		<330	<330	<330	<330	<300	<330	<330	<330
Benzo(a)pyrene (Q)	50-32-8	NLL	NLL	NLL	8,000		<330	<330	<330	<330	<300	<330	<330	<330
Benzo(b)fluoranthene (Q)	205-99-2	NLL	NLL	NLL	80,000		<330	<330	<330	<330	<300	<330	<330	<330
Benzo(g,h,i)perylene	191-24-2	NLL	NLL	NLL	7.0E+6		<330	<330	<330	<330	<300	<330	<330	<330
Benzo(k)fluoranthene (Q)	207-08-9	NLL	NLL	NLL	8.0E+5		<330	<330	<330	<330	<300	<330	<330	<330
Chrysene (Q)	218-01-9	NLL	NLL	NLL	8.0E+6		<330	<330	<330	<330	<300	<330	<330	<330
Dibenzo(a,h)anthracene (Q)	53-70-3	NLL	NLL	NLL	8,000		<330	<330	<330	<330	<300	<330	<330	<330
Fluoranthene	206-44-0	7.3E+5	5,500	7.3E+5	1.3E+8		<330	<330	<330	<330	<300	<330	<330	<330
Fluorene	86-73-7	3.9E+5	5,300	8.9E+5	8.7E+7		<330	<330	<330	<330	<300	<330	<330	<330
Indeno(1,2,3-cd)pyrene (Q)	193-39-5	NLL	NLL	NLL	80,000		<330	<330	<330	<330	<300	<330	<330	<330
2-Methylnaphthalene	91-57-6	57,000	4,200	5.5E+6	2.6E+7		NA	NA	NA	NA	NA	NA	NA	NA
1-Methylnaphthalene	90-12-0	NLL	NLL	NLL	NLL		NA	NA	NA	NA	NA	NA	NA	NA
Naphthalene	91-20-3	35,000	730	2.1E+6	5.2E+7		<330	<330	<330	<330	<300	<330	<330	<330
Phenanthrene	85-01-8	56,000	2,100	1.1E+6	5.2E+6		<330	<330	<330	<330	<300	<330	<330	<330
Pyrene	129-00-0	4.8E+5	ID	4.8E+5	8.4E+7		<330	<330	<330	<330	<300	<330	<330	<330

Analytical results compared to the MDEQ Part 201 Non-Residential Cleanup Criteria
Results in parts per billion (ppb)/micrograms per liter (ug/mg)

Bold-exceeds the MDEQ Part 201 Non Residential Drinking Water Criteria

Shaded-Exceeds Non-Residential GSI Criteria

Italic-Exceeds Groundwater Protection Criteria

Green & Underline -Exceeds Non-Residential Direct Contact Criteria

NS - Not Sampled

NA - Not Analyzed or Not Applicable

Note: Includes analytes with concentrations above the Non Residential cleanup criteria only.

Table 1B
Soil Analytical Results-PNAs/SVOCs
RACER Trust - Davison Road Industrial Land
Burton, MI
Revised 8/16

Guidesheet Number →		#11	#12	#13	#27								
Sample ID	Chemical Abstract Service Number	Non-Residential Drinking Water Protection Criteria and RBSLs	Non-Residential Groundwater Surface Water Interface Protection Criteria and RBSLs	Non-Residential Groundwater Contact Protection Criteria and RBSLs	Non-Residential Direct Contact Criteria and RBSLs	Sample Location	SB/MW-14-12	SB-15-12	SB/MW-15-14	SB-16-12	SB/MW-16-14	SB-17-12	Duplicate 2
Sample Depth						Collection Date	(6.5'-7')	(11-12')	(7.5-9.5')	(5'-6')	(6'-7')	(2'-2.5')	
Sample Date							07/17/2012	07/20/2012	9/23/2014	07/19/2012	9/23/2014	07/19/2012	07/17/2012
<i>Semi volatiles, PNAs ug/Kg</i>													
Acenaphthene	83-32-9	3.0E+5	8,700	9.7E+5	1.3E+8		<330	<300	<330	<300	NA	<300	<330
Acenaphthylene	208-96-8	5,900	ID	4.4E+5	5.2E+6		<330	<300	<330	<300	NA	<300	<330
Anthracene	120-12-7	41,000	ID	41,000	7.3E+8		<330	<300	<330	<300	NA	<300	<330
Benzo(a)anthracene (Q)	56-55-3	NLL	NLL	NLL	80,000		<330	<300	<330	<300	NA	<300	344
Benzo(a)pyrene (Q)	50-32-8	NLL	NLL	NLL	8,000		<330	<300	<330	<300	NA	<300	1,152
Benzo(b)fluoranthene (Q)	205-99-2	NLL	NLL	NLL	80,000		<330	<300	<330	<300	NA	<300	1,587
Benzo(g,h,i)perylene	191-24-2	NLL	NLL	NLL	7.0E+6		<330	<300	<330	<300	NA	<300	612
Benzo(k)fluoranthene (Q)	207-08-9	NLL	NLL	NLL	8.0E+5		<330	<300	<330	<300	NA	<300	1,583
Chrysene (Q)	218-01-9	NLL	NLL	NLL	8.0E+6		<330	<300	<330	<300	NA	<300	435
Dibenzo(a,h)anthracene (Q)	53-70-3	NLL	NLL	NLL	8,000		<330	<300	<330	<300	NA	<300	<330
Fluoranthene	206-44-0	7.3E+5	5,500	7.3E+5	1.3E+8		<330	<300	<330	<300	NA	<300	493
Fluorene	86-73-7	3.9E+5	5,300	8.9E+5	8.7E+7		<330	<300	<330	<300	NA	<300	<330
Indeno(1,2,3-cd)pyrene (Q)	193-39-5	NLL	NLL	NLL	80,000		<330	<300	<330	<300	NA	<300	525
2-Methylnaphthalene	91-57-6	57,000	4,200	5.5E+6	2.6E+7		NA	<300	<330	<300	NA	<300	NA
1-Methylnaphthalene	90-12-0	NLL	NLL	NLL	NLL		NA	NA	NA	NA	NA	NA	NA
Naphthalene	91-20-3	35,000	730	2.1E+6	5.2E+7		<330	<300	<330	<300	NA	<300	<330
Phenanthrene	85-01-8	56,000	2,100	1.1E+6	5.2E+6		<330	<300	<330	<300	NA	<300	<330
Pyrene	129-00-0	4.8E+5	ID	4.8E+5	8.4E+7		<330	<300	<330	<300	NA	<300	540

Analytical results compared to the MDEQ Part 201 Non-Residential Cleanup Criteria
Results in parts per billion (ppb)/micrograms per liter (ug/mg)

Bold-exceeds the MDEQ Part 201 Non Residential Drinking Water Criteria

Shaded-Exceeds Non-Residential GSI Criteria

Italic-Exceeds Groundwater Protection Criteria

Green & Underline -Exceeds Non-Residential Direct Contact Criteria

NS - Not Sampled

NA - Not Analyzed or Not Applicable

Note: Includes analytes with concentrations above the Non Residential cleanup criteria only.

Table 1B
Soil Analytical Results-PNAs/SVOCs
RACER Trust - Davison Road Industrial Land
Burton, MI
Revised 8/16

Guidesheet Number →		#11	#12	#13	#27									
Sample ID	Chemical Abstract Service Number	Non-Residential Drinking Water Protection Criteria and RBSLs	Non-Residential Groundwater Surface Water Interface Protection Criteria and RBSLs	Non-Residential Groundwater Contact Protection Criteria and RBSLs	Non-Residential Direct Contact Criteria and RBSLs	Sample Location	SB-18-12	SB-18-12	SB-18-12	SB-19-12	SB-20-12	SB-21-12	SB-22-12	SB-23-12
Sample Depth						Collection Date	(2'-3')	(8'-9')	(8'-9') DUP	(3'-4')	(1'-2')	(0'-2')	(2'-3')	(1.5'-2.5')
Sample Date							07/20/2012	07/20/2012	07/20/2012	07/20/2012	07/20/2012	07/17/2012	07/17/2012	07/17/2012
Semi volatiles, PNAs ug/Kg														
Acenaphthene	83-32-9	3.0E+5	8,700	9.7E+5	1.3E+8		<300	<300	<300	<300	<300	<300	<300	<300
Acenaphthylene	208-96-8	5,900	ID	4.4E+5	5.2E+6		<300	<300	<300	<300	<300	<300	<300	<300
Anthracene	120-12-7	41,000	ID	41,000	7.3E+8		<300	<300	<300	<300	<300	<300	<300	<300
Benzo(a)anthracene (Q)	56-55-3	NLL	NLL	NLL	80,000		<300	<300	<300	<300	<300	<300	<300	<300
Benzo(a)pyrene (Q)	50-32-8	NLL	NLL	NLL	8,000		<300	<300	<300	<300	<300	<300	<300	<300
Benzo(b)fluoranthene (Q)	205-99-2	NLL	NLL	NLL	80,000		<300	<300	<300	<300	<300	<300	<300	<300
Benzo(g,h,i)perylene	191-24-2	NLL	NLL	NLL	7.0E+6		<300	<300	<300	<300	<300	<300	<300	<300
Benzo(k)fluoranthene (Q)	207-08-9	NLL	NLL	NLL	8.0E+5		<300	<300	<300	<300	<300	<300	<300	<300
Chrysene (Q)	218-01-9	NLL	NLL	NLL	8.0E+6		<300	<300	<300	<300	<300	<300	<300	<300
Dibenzo(a,h)anthracene (Q)	53-70-3	NLL	NLL	NLL	8,000		<300	<300	<300	<300	<300	<300	<300	<300
Fluoranthene	206-44-0	7.3E+5	5,500	7.3E+5	1.3E+8		<300	<300	<300	<300	<300	<300	<300	<300
Fluorene	86-73-7	3.9E+5	5,300	8.9E+5	8.7E+7		<300	<300	<300	<300	<300	<300	<300	<300
Indeno(1,2,3-cd)pyrene (Q)	193-39-5	NLL	NLL	NLL	80,000		<300	<300	<300	<300	<300	<300	<300	<300
2-Methylnaphthalene	91-57-6	57,000	4,200	5.5E+6	2.6E+7		<300	<300	<300	<300	<300	<300	<300	<300
1-Methylnaphthalene	90-12-0	NLL	NLL	NLL	NLL		NA	NA	NA	NA	NA	NA	NA	NA
Naphthalene	91-20-3	35,000	730	2.1E+6	5.2E+7		<300	<300	<300	<300	<300	<300	<300	<300
Phenanthrene	85-01-8	56,000	2,100	1.1E+6	5.2E+6		<300	<300	<300	<300	<300	<300	<300	<300
Pyrene	129-00-0	4.8E+5	ID	4.8E+5	8.4E+7		<300	<300	<300	<300	<300	<300	<300	<300

Analytical results compared to the MDEQ Part 201 Non-Residential Cleanup Criteria
Results in parts per billion (ppb)/micrograms per liter (ug/mg)

Bold-exceeds the MDEQ Part 201 Non Residential Drinking Water Criteria

Shaded-Exceeds Non-Residential GSI Criteria

Italic-Exceeds Groundwater Protection Criteria

Green & Underline -Exceeds Non-Residential Direct Contact Criteria

NS - Not Sampled

NA - Not Analyzed or Not Applicable

Note: Includes analytes with concentrations above the Non Residential cleanup criteria only.

Table 1B
Soil Analytical Results-PNAs/SVOCs
RACER Trust - Davison Road Industrial Land
Burton, MI
Revised 8/16

Guidesheet Number →		#11	#12	#13	#27							
Sample ID	Chemical Abstract Service Number	Non-Residential Drinking Water Protection Criteria and RBSLs	Non-Residential Groundwater Surface Water Interface Protection Criteria and RBSLs	Non-Residential Groundwater Contact Protection Criteria and RBSLs	Non-Residential Direct Contact Criteria and RBSLs	Sample Location	SB-24-12	SB-25-12	SB-26-12	SB-27-12	SB-27-12	SB-28-12
Sample Depth						Collection Date	(3'-4')	(11'-12')	(7'-8')	(2'-3')	(6'-7')	(2'-3')
Sample Date							07/16/2012	07/17/2012	07/16/2012	07/20/2012	07/20/2012	07/19/2012
<i>Semi volatiles, PNAs ug/Kg</i>												
Acenaphthene	83-32-9	3.0E+5	8,700	9.7E+5	1.3E+8		<500	<300	<300	<330	<330	<330
Acenaphthylene	208-96-8	5,900	ID	4.4E+5	5.2E+6		<500	<300	<300	<330	<330	<330
Anthracene	120-12-7	41,000	ID	41,000	7.3E+8		<500	<300	<300	782	546	<330
Benzo(a)anthracene (Q)	56-55-3	NLL	NLL	NLL	80,000		1,000	<300	<300	2,737	446	<330
Benzo(a)pyrene (Q)	50-32-8	NLL	NLL	NLL	8,000		1,800	<300	<300	3,200	956	<330
Benzo(b)fluoranthene (Q)	205-99-2	NLL	NLL	NLL	80,000		3,500	<300	<300	5,699	1,333	<330
Benzo(g,h,i)perylene	191-24-2	NLL	NLL	NLL	7.0E+6		<500	<300	<300	1,200	446	<330
Benzo(k)fluoranthene (Q)	207-08-9	NLL	NLL	NLL	8.0E+5		3,800	<300	<300	5,690	1,333	<330
Chrysene (Q)	218-01-9	NLL	NLL	NLL	8.0E+6		1,800	<300	<300	2,926	1,137	<330
Dibenzo(a,h)anthracene (Q)	53-70-3	NLL	NLL	NLL	8,000		<500	<300	<300	364	<330	<330
Fluoranthene	206-44-0	7.3E+5	5,500	7.3E+5	1.3E+8		1,200	<300	<300	5,730	675	<330
Fluorene	86-73-7	3.9E+5	5,300	8.9E+5	8.7E+7		<500	<300	<300	<330	<330	<330
Indeno(1,2,3-cd)pyrene (Q)	193-39-5	NLL	NLL	NLL	80,000		<500	<300	<300	1,101	442	<330
2-Methylnaphthalene	91-57-6	57,000	4,200	5.5E+6	2.6E+7		<500	<300	<300	NA	NA	NA
1-Methylnaphthalene	90-12-0	NLL	NLL	NLL	NLL		NA	NA	NA	NA	NA	NA
Naphthalene	91-20-3	35,000	730	2.1E+6	5.2E+7		<500	<300	<300	<330	<330	<330
Phenanthrene	85-01-8	56,000	2,100	1.1E+6	5.2E+6		<500	<300	<300	3,389	434	<330
Pyrene	129-00-0	4.8E+5	ID	4.8E+5	8.4E+7		1,700	<300	<300	5,649	598	<330

Analytical results compared to the MDEQ Part 201 Non-Residential Cleanup Criteria
Results in parts per billion (ppb)/micrograms per liter (ug/mg)

Bold-exceeds the MDEQ Part 201 Non Residential Drinking Water Criteria
Shaded-Exceeds Non-Residential GSI Criteria
Italic-Exceeds Groundwater Protection Criteria
Green & Underline -Exceeds Non-Residential Direct Contact Criteria
NS - Not Sampled
NA - Not Analyzed or Not Applicable

Note: Includes analytes with concentrations above the Non Residential cleanup criteria only.

Table 1B
Soil Analytical Results-PNAs/SVOCs
RACER Trust - Davison Road Industrial Land
Burton, MI
Revised 8/16

Guidesheet Number →		#11	#12	#13	#27											
Sample ID	Chemical Abstract Service Number	Non-Residential Drinking Water Protection Criteria and RBSLs	Non-Residential Groundwater Surface Water Interface Protection Criteria and RBSLs	Non-Residential Groundwater Contact Protection Criteria and RBSLs	Non-Residential Direct Contact Criteria and RBSLs	Sample Location	DC-03 10'					DC-04-S02				
Sample Depth						Collection Date	(0-2')	(2-4')	(4-6')	(6-8')	(8-10')	(0-2')	(2-4')	(4-6')	(6-8')	(8-10')
Sample Date							8/25/2015	8/25/2015	8/25/2015	8/25/2015	8/25/2015	8/25/2015	8/25/2015	8/25/2015	8/25/2015	8/25/2015
<i>Semi volatiles, PNAs ug/Kg</i>																
Acenaphthene	83-32-9	3.0E+5	8,700	9.7E+5	1.3E+8		<300	<300	<300	<300	<300	<300	<300	<300	<300	<500
Acenaphthylene	208-96-8	5,900	ID	4.4E+5	5.2E+6		<300	<300	<300	<300	<300	<300	<300	<300	<300	<500
Anthracene	120-12-7	41,000	ID	41,000	7.3E+8		<300	<300	700	<300	<300	<300	<300	<300	<300	700
Benzo(a)anthracene (Q)	56-55-3	NLL	NLL	NLL	80,000		500	300	1,100	<300	<300	500	<300	<300	<300	1,500
Benzo(a)pyrene (Q)	50-32-8	NLL	NLL	NLL	8,000		500	400	900	<300	<300	500	<300	<300	<300	1,300
Benzo(b)fluoranthene (Q)	205-99-2	NLL	NLL	NLL	80,000		1,200	800	1,800	<300	<300	1,000	<300	600	<300	1,400
Benzo(g,h,i)perylene	191-24-2	NLL	NLL	NLL	7.0E+6		<300	<300	300	<300	<300	300	<300	<300	<300	600
Benzo(k)fluoranthene (Q)	207-08-9	NLL	NLL	NLL	8.0E+5		1,200	800	1,900	<300	<300	1,100	<300	600	<300	1,300
Chrysene (Q)	218-01-9	NLL	NLL	NLL	8.0E+6		600	400	1,200	<300	<300	600	<300	<300	<300	1,400
Dibenzo(a,h)anthracene (Q)	53-70-3	NLL	NLL	NLL	8,000		<300	<300	<300	<300	<300	<300	<300	<300	<300	<500
Fluoranthene	206-44-0	7.3E+5	5,500	7.3E+5	1.3E+8		1,200	700	2,500	<300	<300	1,000	<300	400	<300	3,900
Fluorene	86-73-7	3.9E+5	5,300	8.9E+5	8.7E+7		<300	<300	400	<300	<300	<300	<300	<300	<300	<500
Indeno(1,2,3-cd)pyrene (Q)	193-39-5	NLL	NLL	NLL	80,000		<300	<300	300	<300	<300	<300	<300	<300	<300	600
2-Methylnaphthalene	91-57-6	57,000	4,200	5.5E+6	2.6E+7		<300	<300	<300	<300	<300	<300	<300	<300	<300	<500
1-Methylnaphthalene	90-12-0	NLL	NLL	NLL	NLL		<300	<300	<300	<300	<300	<300	<300	<300	<300	<500
Naphthalene	91-20-3	35,000	730	2.1E+6	5.2E+7		<300	<300	400	<300	<300	<300	<300	<300	<300	<500
Phenanthrene	85-01-8	56,000	2,100	1.1E+6	5.2E+6		800	400	2,500	<300	<300	600	<300	<300	<300	2,200
Pyrene	129-00-0	4.8E+5	ID	4.8E+5	8.4E+7		1,000	600	2,100	<300	<300	900	<300	400	<300	2,300

Analytical results compared to the MDEQ Part 201 Non-Residential Cleanup Criteria
Results in parts per billion (ppb)/micrograms per liter (ug/mg)

Bold-exceeds the MDEQ Part 201 Non Residential Drinking Water Criteria

Shaded-Exceeds Non-Residential GSI Criteria

Italic-Exceeds Groundwater Protection Criteria

Green & Underline -Exceeds Non-Residential Direct Contact Criteria

NS - Not Sampled

NA - Not Analyzed or Not Applicable

Note: Includes analytes with concentrations above the Non Residential cleanup criteria only.

Table 1B
Soil Analytical Results-PNAs/SVOCs
RACER Trust - Davison Road Industrial Land
Burton, MI
Revised 8/16

Guidesheet Number →		#11	#12	#13	#27											
Sample ID	Chemical Abstract Service Number	Non-Residential Drinking Water Protection Criteria and RBSLs	Non-Residential Groundwater Surface Water Interface Protection Criteria and RBSLs	Non-Residential Groundwater Contact Protection Criteria and RBSLs	Non-Residential Direct Contact Criteria and RBSLs	Sample Location	DC-05 10'					DC-06 15'				
Sample Depth						Collection Date	(0-2')	(2-4')	(4-6')	(6-8')	(8-10')	(0-2')	(2-4')	(4-6')	(6-8')	(8-10')
Sample Date							8/25/2015	8/25/2015	8/25/2015	8/25/2015	8/25/2015	8/25/2015	8/25/2015	8/25/2015	8/25/2015	8/25/2015
<i>Semi volatiles, PNAs ug/Kg</i>																
Acenaphthene	83-32-9	3.0E+5	8,700	9.7E+5	1.3E+8		<300	<300	<500	22,000	<500	<300	<300	<500	<300	<300
Acenaphthylene	208-96-8	5,900	ID	4.4E+5	5.2E+6		<300	<300	<500	<1000	<500	<300	<300	<500	<300	<300
Anthracene	120-12-7	41,000	ID	41,000	7.3E+8		<300	<300	<500	36,700	<500	<300	<300	<500	<300	<300
Benzo(a)anthracene (Q)	56-55-3	NLL	NLL	NLL	80,000		<300	<300	<500	53,800	<500	<300	<300	<500	<300	<300
Benzo(a)pyrene (Q)	50-32-8	NLL	NLL	NLL	8,000		<300	<300	<500	47,400	<500	<300	<300	<500	<300	<300
Benzo(b)fluoranthene (Q)	205-99-2	NLL	NLL	NLL	80,000		400	<300	<500	106,200	700	<300	<300	<500	<300	<300
Benzo(g,h,i)perylene	191-24-2	NLL	NLL	NLL	7.0E+6		<300	<300	<500	9,900	<500	<300	<300	<500	<300	<300
Benzo(k)fluoranthene (Q)	207-08-9	NLL	NLL	NLL	8.0E+5		400	<300	<500	112,600	700	<300	<300	<500	<300	<300
Chrysene (Q)	218-01-9	NLL	NLL	NLL	8.0E+6		<300	<300	<500	50,100	<500	<300	<300	<500	<300	<300
Dibenzo(a,h)anthracene (Q)	53-70-3	NLL	NLL	NLL	8,000		<300	<300	<500	3,300	<500	<300	<300	<500	<300	<300
Fluoranthene	206-44-0	7.3E+5	5,500	7.3E+5	1.3E+8		400	<300	<500	143,300	700	<300	<300	<500	<300	<300
Fluorene	86-73-7	3.9E+5	5,300	8.9E+5	8.7E+7		<300	<300	<500	18,500	<500	<300	<300	<500	<300	<300
Indeno(1,2,3-cd)pyrene (Q)	193-39-5	NLL	NLL	NLL	80,000		<300	<300	<500	11,500	<500	<300	<300	<500	<300	<300
2-Methylnaphthalene	91-57-6	57,000	4,200	5.5E+6	2.6E+7		<300	<300	<500	3,300	<500	<300	<300	<500	<300	<300
1-Methylnaphthalene	90-12-0	NLL	NLL	NLL	NLL		<300	<300	<500	1,900	<500	<300	<300	<500	<300	<300
Naphthalene	91-20-3	35,000	730	2.1E+6	5.2E+7		<300	<300	<500	21,800	<500	<300	<300	<500	<300	<300
Phenanthrene	85-01-8	56,000	2,100	1.1E+6	5.2E+6		<300	<300	<500	124,400	<500	<300	<300	<500	<300	<300
Pyrene	129-00-0	4.8E+5	ID	4.8E+5	8.4E+7		<300	<300	<500	125,700	<500	<300	<300	<500	<300	<300

Analytical results compared to the MDEQ Part 201 Non-Residential Cleanup Criteria
Results in parts per billion (ppb)/micrograms per liter (ug/mg)

Bold-exceeds the MDEQ Part 201 Non Residential Drinking Water Criteria

Shaded-Exceeds Non-Residential GSI Criteria

Italic-Exceeds Groundwater Protection Criteria

Green & Underline -Exceeds Non-Residential Direct Contact Criteria

NS - Not Sampled

NA - Not Analyzed or Not Applicable

Note: Includes analytes with concentrations above the Non Residential cleanup criteria only.

Table 1B
Soil Analytical Results-PNAs/SVOCs
RACER Trust - Davison Road Industrial Land
Burton, MI
Revised 8/16

Guidesheet Number →		#11	#12	#13	#27											
Sample ID	Chemical Abstract Service Number	Non-Residential Drinking Water Protection Criteria and RBSLs	Non-Residential Groundwater Surface Water Interface Protection Criteria and RBSLs	Non-Residential Groundwater Contact Protection Criteria and RBSLs	Non-Residential Direct Contact Criteria and RBSLs	Sample Location	DC-08 10'					DC-11 10'				
Sample Depth						Collection Date	(0-2')	(2-4')	(4-6')	(6-8')	(8-10')	(0-2')	(2-4')	(4-6')	(6-8')	(8-10')
Sample Date							8/25/2015	8/25/2015	8/25/2015	8/25/2015	8/25/2015	8/25/2015	8/25/2015	8/25/2015	8/25/2015	8/25/2015
<i>Semi volatiles, PNAs ug/Kg</i>																
Acenaphthene	83-32-9	3.0E+5	8,700	9.7E+5	1.3E+8		<300	<300	<300	<300	<300	<300	<500	<300	<500	<300
Acenaphthylene	208-96-8	5,900	ID	4.4E+5	5.2E+6		<300	<300	<300	<300	<300	<300	<500	<300	<500	<300
Anthracene	120-12-7	41,000	ID	41,000	7.3E+8		<300	<300	<300	<300	<300	<300	<500	<300	<500	<300
Benzo(a)anthracene (Q)	56-55-3	NLL	NLL	NLL	80,000		<300	<300	<300	<300	<300	<300	<500	<300	<500	<300
Benzo(a)pyrene (Q)	50-32-8	NLL	NLL	NLL	8,000		<300	<300	<300	<300	<300	<300	<500	<300	<500	<300
Benzo(b)fluoranthene (Q)	205-99-2	NLL	NLL	NLL	80,000		<300	<300	<300	<300	<300	<300	500	<300	<500	<300
Benzo(g,h,i)perylene	191-24-2	NLL	NLL	NLL	7.0E+6		<300	<300	<300	<300	<300	<300	<500	<300	<500	<300
Benzo(k)fluoranthene (Q)	207-08-9	NLL	NLL	NLL	8.0E+5		<300	<300	<300	<300	<300	<300	600	<300	<500	<300
Chrysene (Q)	218-01-9	NLL	NLL	NLL	8.0E+6		<300	<300	<300	<300	<300	<300	<500	<300	<500	<300
Dibenzo(a,h)anthracene (Q)	53-70-3	NLL	NLL	NLL	8,000		<300	<300	<300	<300	<300	<300	<500	<300	<500	<300
Fluoranthene	206-44-0	7.3E+5	5,500	7.3E+5	1.3E+8		<300	<300	<300	<300	<300	<300	<500	<300	<500	<300
Fluorene	86-73-7	3.9E+5	5,300	8.9E+5	8.7E+7		<300	<300	<300	<300	<300	<300	<500	<300	<500	<300
Indeno(1,2,3-cd)pyrene (Q)	193-39-5	NLL	NLL	NLL	80,000		<300	<300	<300	<300	<300	<300	<500	<300	<500	<300
2-Methylnaphthalene	91-57-6	57,000	4,200	5.5E+6	2.6E+7		<300	<300	<300	<300	<300	<300	<500	<300	<500	<300
1-Methylnaphthalene	90-12-0	NLL	NLL	NLL	NLL		<300	<300	<300	<300	<300	<300	<500	<300	<500	<300
Naphthalene	91-20-3	35,000	730	2.1E+6	5.2E+7		<300	<300	<300	<300	<300	<300	<500	<300	<500	<300
Phenanthrene	85-01-8	56,000	2,100	1.1E+6	5.2E+6		<300	<300	<300	<300	<300	<300	<500	<300	<500	<300
Pyrene	129-00-0	4.8E+5	ID	4.8E+5	8.4E+7		<300	<300	<300	<300	<300	<300	<500	<300	<500	<300

Analytical results compared to the MDEQ Part 201 Non-Residential Cleanup Criteria
Results in parts per billion (ppb)/micrograms per liter (ug/mg)

Bold-exceeds the MDEQ Part 201 Non Residential Drinking Water Criteria

Shaded-Exceeds Non-Residential GSI Criteria

Italic-Exceeds Groundwater Protection Criteria

Green & Underline -Exceeds Non-Residential Direct Contact Criteria

NS - Not Sampled

NA - Not Analyzed or Not Applicable

Note: Includes analytes with concentrations above the Non Residential cleanup criteria only.

Table 1B
 Soil Analytical Results-PNAs/SVOCs
 RACER Trust - Davison Road Industrial Land
 Burton, MI
 Revised 8/16

Guidesheet Number →		#11	#12	#13	#27									
Sample ID	Chemical Abstract Service Number	Non-Residential Drinking Water Protection Criteria and RBSLs	Non-Residential Groundwater Surface Water Interface Protection Criteria and RBSLs	Non-Residential Groundwater Contact Protection Criteria and RBSLs	Non-Residential Direct Contact Criteria and RBSLs	Sample Location	DC-16 10'			DC-17 (FA-17)		DC-18 10'		
Sample Depth						Collection Date	(0-2')	(2-4')	(4-6')	(0-2')	(2-4')	(0-2')	(2-4')	(4-6')
Sample Date							8/26/2015	8/26/2015	8/26/2015	8/26/2015	8/26/2015	8/26/2015	8/26/2015	8/26/2015
<i>Semi volatiles, PNAs ug/Kg</i>														
Acenaphthene	83-32-9	3.0E+5	8,700	9.7E+5	1.3E+8		<300	<300	<300	<300	<300	<600	<800	<300
Acenaphthylene	208-96-8	5,900	ID	4.4E+5	5.2E+6		<300	<300	<300	<300	<300	<600	<800	<300
Anthracene	120-12-7	41,000	ID	41,000	7.3E+8		<300	<300	<300	<300	<300	<600	<800	<300
Benzo(a)anthracene (Q)	56-55-3	NLL	NLL	NLL	80,000		<300	<300	<300	400	<300	<600	<800	300
Benzo(a)pyrene (Q)	50-32-8	NLL	NLL	NLL	8,000		<300	<300	<300	400	<300	700	<800	<300
Benzo(b)fluoranthene (Q)	205-99-2	NLL	NLL	NLL	80,000		700	<300	<300	800	<300	1,100	1,400	<300
Benzo(g,h,i)perylene	191-24-2	NLL	NLL	NLL	7.0E+6		<300	<300	<300	<300	<300	<600	<800	<300
Benzo(k)fluoranthene (Q)	207-08-9	NLL	NLL	NLL	8.0E+5		800	300	<300	900	<300	1,200	1,700	<300
Chrysene (Q)	218-01-9	NLL	NLL	NLL	8.0E+6		<300	<300	<300	400	<300	<600	<800	300
Dibenzo(a,h)anthracene (Q)	53-70-3	NLL	NLL	NLL	8,000		<300	<300	<300	<300	<300	<600	<800	<300
Fluoranthene	206-44-0	7.3E+5	5,500	7.3E+5	1.3E+8		500	500	400	900	<300	800	1,700	600
Fluorene	86-73-7	3.9E+5	5,300	8.9E+5	8.7E+7		<300	<300	<300	<300	<300	<600	<800	300
Indeno(1,2,3-cd)pyrene (Q)	193-39-5	NLL	NLL	NLL	80,000		<300	<300	<300	<300	<300	<600	<800	<300
2-Methylnaphthalene	91-57-6	57,000	4,200	5.5E+6	2.6E+7		<300	400	<300	<300	700	<600	800	1,700
1-Methylnaphthalene	90-12-0	NLL	NLL	NLL	NLL		400	1,000	<300	300	1,200	<600	1,200	2,300
Naphthalene	91-20-3	35,000	730	2.1E+6	5.2E+7		<300	<300	<300	<300	<300	<600	<800	400
Phenanthrene	85-01-8	56,000	2,100	1.1E+6	5.2E+6		<300	600	<300	600	500	<600	<800	1,000
Pyrene	129-00-0	4.8E+5	ID	4.8E+5	8.4E+7		<300	400	<300	<300	<300	700	1,400	<300

Analytical results compared to the MDEQ Part 201 Non-Residential Cleanup Criteria
 Results in parts per billion (ppb)/micrograms per liter (ug/mg)

Bold-exceeds the MDEQ Part 201 Non Residential Drinking Water Criteria
 Shaded-Exceeds Non-Residential GSI Criteria
Italic-Exceeds Groundwater Protection Criteria
 Green & Underline -Exceeds Non-Residential Direct Contact Criteria
 NS - Not Sampled
 NA - Not Analyzed or Not Applicable

Note: Includes analytes with concentrations above the Non Residential cleanup criteria only.

Table 1B
Soil Analytical Results-PNAs/SVOCs
RACER Trust - Davison Road Industrial Land
Burton, MI
Revised 8/16

Guidesheet Number →		#11	#12	#13	#27							
Sample ID	Chemical Abstract Service Number	Non-Residential Drinking Water Protection Criteria and RBSLs	Non-Residential Groundwater Surface Water Interface Protection Criteria and RBSLs	Non-Residential Groundwater Contact Protection Criteria and RBSLs	Non-Residential Direct Contact Criteria and RBSLs	Sample Location	DC-21 10'			DC-24 10'		
Sample Depth						Collection Date	(0-2')	(2-4')	(4-6')	(0-2')	(2-4')	(4-6')
Sample Date							8/26/2015	8/26/2015	8/26/2015	8/26/2015	8/26/2015	8/26/2015
Semi volatiles, PNAs ug/Kg												
Acenaphthene	83-32-9	3.0E+5	8,700	9.7E+5	1.3E+8		<600	<500	<500	<500	<300	<300
Acenaphthylene	208-96-8	5,900	ID	4.4E+5	5.2E+6		<600	<500	<500	<500	<300	<300
Anthracene	120-12-7	41,000	ID	41,000	7.3E+8		<600	<500	<500	<500	<300	<300
Benzo(a)anthracene (Q)	56-55-3	NLL	NLL	NLL	80,000		600	<500	<500	<500	<300	<300
Benzo(a)pyrene (Q)	50-32-8	NLL	NLL	NLL	8,000		600	<500	<500	<500	<300	<300
Benzo(b)fluoranthene (Q)	205-99-2	NLL	NLL	NLL	80,000		1,200	<500	<500	<500	400	<300
Benzo(g,h,i)perylene	191-24-2	NLL	NLL	NLL	7.0E+6		<600	<500	<500	<500	<300	<300
Benzo(k)fluoranthene (Q)	207-08-9	NLL	NLL	NLL	8.0E+5		1,300	<500	<500	<500	400	<300
Chrysene (Q)	218-01-9	NLL	NLL	NLL	8.0E+6		600	<500	<500	<500	<300	<300
Dibenzo(a,h)anthracene (Q)	53-70-3	NLL	NLL	NLL	8,000		<600	<500	<500	<500	<300	<300
Fluoranthene	206-44-0	7.3E+5	5,500	7.3E+5	1.3E+8		1,400	1,000	800	<500	500	<300
Fluorene	86-73-7	3.9E+5	5,300	8.9E+5	8.7E+7		<600	700	<500	<500	<300	<300
Indeno(1,2,3-cd)pyrene (Q)	193-39-5	NLL	NLL	NLL	80,000		<600	<500	<500	<500	<300	<300
2-Methylnaphthalene	91-57-6	57,000	4,200	5.5E+6	2.6E+7		<600	1,600	2,800	<500	400	<300
1-Methylnaphthalene	90-12-0	NLL	NLL	NLL	NLL		<600	1,500	4,300	500	600	<300
Naphthalene	91-20-3	35,000	730	2.1E+6	5.2E+7		<600	800	700	<500	<300	<300
Phenanthrene	85-01-8	56,000	2,100	1.1E+6	5.2E+6		1,100	1,100	1,400	<500	<300	<300
Pyrene	129-00-0	4.8E+5	ID	4.8E+5	8.4E+7		900	700	800	<500	400	<300

Analytical results compared to the MDEQ Part 201 Non-Residential Cleanup Criteria
Results in parts per billion (ppb)/micrograms per liter (ug/mg)

Bold-exceeds the MDEQ Part 201 Non Residential Drinking Water Criteria

Shaded-Exceeds Non-Residential GSI Criteria

Italic-Exceeds Groundwater Protection Criteria

Green & Underline -Exceeds Non-Residential Direct Contact Criteria

NS - Not Sampled

NA - Not Analyzed or Not Applicable

Note: Includes analytes with concentrations above the Non Residential cleanup criteria only.

Table 1C
Soil Analytical Results-Metals
RACER Trust - Davison Road Industrial Land
Burton, MI
Revised 8/16

Sample ID	Statewide Default Background Levels	Non-Residential Drinking Water Protection Criteria and RBSLs	Non-Residential Groundwater Surface Water Interface Protection Criteria and RBSLs	Non-Residential Groundwater Contact Protection Criteria and RBSLs	SB/MW-1-12	SB/MW-2-12	SB/MW-3-12	SB/MW-4-12	SB/MW-4-12	SB/MW-5-12	SB/MW-6-12	SB/MW-7-12	SB/MW-8-12	SB/MW-9 -12	SB/MW-10-12
Sample Depth					(7'-7.5')	(14'-15')	(3'-4')	(2'-3')	(2'-3') DUP	(9'10')	(14'-15')	(4'-5')	(5'-6')	(6'-8')	(2'-3')
Sample Date					07/17/2012	07/16/2012	07/19/2012	07/19/2012	07/19/2012	07/20/2012	07/17/2012	07/19/2012	07/18/2012	07/18/2012	07/18/2012
Metals ug/Kg															
Aluminum (B)	6.9E+6	1,000	NA	1.09e+9 (D)	2,440,000	885,000	1,940,000	1,740,000	2,550,000	1,780,000	2,330,000	5,590,000	3,640,000	2,680,000	3,360,000
Arsenic	5,800	4,600	4,600	2,000,000	1,400	6,110	4,700	7,090	11,800	1,000	1,680	680	2,310	7,240	4,970
Cadmium (B)	1,200	6,000	5,900	2.30E+08	<200	<200	<200	250	350	210	260	<200	<200	<200	<200
Chromium, Total	18,000 (total)	1.09E+9(D)	(G,X)	1.09e+9(D)	3,500	2,820	3,280	3,760	5,220	27,500	3,300	5,180	5,140	5,940	5,070
Cobalt	6,800	2,000	2,000	4.80E+07	2,510	3,380	2,260	2,800	4,390	1,520	2,630	5,180	3,780	4,990	3,270
Copper (B)	32,000	5.8E+6	1.30E+05	1.09e+9(D)	5,490	9,300	9,240	9,130	14,400	16,400	9,550	10,200	5,290	14,300	7,080
Iron (B)	1.2E+7	6,000	NA	1.09e+9(D)	3,050,000	7,880,000	4,130,000	2,700,000	4,010,000	18,000,000	3,930,000	26,600,000	5,350,000	10,000,000	18,800,000
Manganese (B)	4.4E+5	1,000	1.0E+5 (X)	1.80E+08	109,000	390,000	131,000	215,000	245,000	343,000	115,000	894,000	232,000	333,000	268,000
Mercury, Total	130	1,700	50 (M); 1.2	47,000	<50	<50	<50	<50	<50	<50	<50	<50	<50	<50	<50
Vanadium	NA	9.90E+05	4.30E+05	1.09e+9(D)	5,460	6,170	7,480	9,620	13,500	5,430	9,220	11,200	12,000	11,100	10,600
Zinc (B)	47,000	5.00E+06	2.90E+05	1.09e+9(D)	15,100	24,200	21,800	15,500	22,300	29,000	17,000	25,400	14,200	19,100	22,300

Analytical results compared to the MDEQ Part 201 Non-Residential Cleanup Criteria
Results in parts per billion (ppb)/micrograms per liter (ug/l)

Bold-exceeds the MDEQ Part 201 Non Residential Drinking Water Criteria
Shaded-Exceeds Non-Residential GSI Criteria
Underlined exceeds the Statewide Default Background Levels
Italic-Exceeds Groundwater Protection Criteria
Exceeds Direct Contact

NS - Not Sampled
NA - Not Analyzed or Not Applicable

GSI Criteria was calculated pursuant to the "Calculation of Generic Facility-Specific Part 201 GSI Criteria for (G) Hazardous Substances"
Facility Specific constituents include: Cadmium, Copper, Manganese and Zinc.

290 mg/CaCO3/L was used to calculate Facility Specific GSIP

Table 1C
Soil Analytical Results-Metals
RACER Trust - Davison Road Industrial Land
Burton, MI
Revised 8/16

Sample ID	Statewide Default Background Levels	Non-Residential Drinking Water Protection Criteria and RBSLs	Non-Residential Groundwater Surface Water Interface Protection Criteria and RBSLs	Non-Residential Groundwater Contact Protection Criteria and RBSLs	SB/MW-11-12	SB/MW-12-12	SB/MW-13-12	SB/MW-14-12	SB-15-12	SB/MW-15-14	SB-16-12	SB/MW-16-14	SB-17-12	SB-18-12	SB-18-12	SB-19-12
Sample Depth					(6'-7')	(8.5'-9.5')	(0.5'-1.5')	(6.5'-7')	(11'-12')	(7.5'-9.5')	(5'-6')	(6'-7')	(2'-2.5')	(2'-3')	(8'-9')	(3'-4')
Sample Date					07/19/2012	07/17/2012	07/17/2012	07/17/2012	07/20/2012	9/23/2014	07/19/2012	9/23/2014	07/19/2012	07/20/2012	07/20/2012	07/20/2012
Metals ug/Kg																
Aluminum (B)	6.9E+6	1,000	NA	1.09e+9 (D)	2,460,000	3,040,000	2,310,000	1,260,000	950,000	2,040,000	4,150,000	NA	2,050,000	1,170,000	4,720,000	4,040,000
Arsenic	5,800	4,600	4,600	2,000,000	3,010	2,160	1,580	1,140	840	4,570	10,500	NA	11,900	650	1,800	1,060
Cadmium (B)	1,200	6,000	5,900	2.30E+08	<200	290	<200	<200	<200	<200	<200	NA	210	<200	<200	<200
Chromium, Total	18,000 (total)	1.09E+9(D)	(G,X)	1.09e+9(D)	3,340	4,170	2,680	2,520	2,030	5,140	7,500	NA	3,420	5,570	8,870	4,040
Cobalt	6,800	2,000	2,000	4.80E+07	2,820	2,400	3,140	1,970	1,720	4,400	10,600	NA	4,130	570	4,610	4,870
Copper (B)	32,000	5.8E+6	1.30E+05	1.09e+9(D)	4,040	9,790	5,810	2,040	5,910	11,200	9,630	NA	5,780	5,500	6,810	4,280
Iron (B)	1.2E+7	6,000	NA	1.09e+9(D)	11,500,000	5,960,000	7,190,000	2,230,000	3,320,000	8,460,000	13,000,000	NA	4,890,000	3,320,000	8,840,000	5,080,000
Manganese (B)	4.4E+5	1,000	1.0E+5 (X)	1.80E+08	377,000	247,000	297,000	220,000	197,000	274,000	1,780,000	NA	343,000	120,000	231,000	411,000
Mercury, Total	130	1,700	50 (M); 1.2	47,000	<50	<50	<50	<50	<50	<50	<50	NA	<50	<50	<50	<50
Vanadium	NA	9.90E+05	4.30E+05	1.09e+9(D)	5,930	10,400	6,310	3,770	4,940	9,050	14,200	NA	13,200	1,100	14,400	6,680
Zinc (B)	47,000	5.00E+06	2.90E+05	1.09e+9(D)	17,900	21,600	22,100	7,870	12,800	14,800	34,200	NA	19,400	6,810	23,200	12,600

Analytical results compared to the MDEQ Part 201 Non-Residential Cleanup Criteria
Results in parts per billion (ppb)/micrograms per liter (ug/l)

Bold-exceeds the MDEQ Part 201 Non Residential Drinking Water Criteria
Shaded-Exceeds Non-Residential GSI Criteria
Underlined exceeds the Statewide Default Background Levels
Italic-Exceeds Groundwater Protection Criteria
Exceeds Direct Contact

NS - Not Sampled
NA - Not Analyzed or Not Applicable

GSI Criteria was calculated pursuant to the "Calculation of Generic Facility-Specific Part 201 GSI Criteria for (G) Hazardous Substances" Facility Specific constituents include: Cadmium, Copper, Manganese and Zinc.

290 mg/CaCO3/L was used to calculate Facility Specific GSIP

Table 1C
Soil Analytical Results-Metals
RACER Trust - Davison Road Industrial Land
Burton, MI
Revised 8/16

Sample ID	Statewide Default Background Levels	Non-Residential Drinking Water Protection Criteria and RBSLs	Non-Residential Groundwater Surface Water Interface Protection Criteria and RBSLs	Non-Residential Groundwater Contact Protection Criteria and RBSLs	SB-20-12	SB-21-12	SB-22-12	SB-23-12	SB-24-12	SB-25-12	SB-26-12	SB-27-12	SB-27-12	SB-28-12
Sample Depth					(1'-2')	(0'-2')	(2'-3')	(1.5'-2.5')	(3'-4')	(11'-12')	(7'-8')	(2'-3')	(6'-7')	(2'-3')
Sample Date					07/20/2012	07/17/2012	07/17/2012	07/17/2012	07/16/2012	07/17/2012	07/16/2012	07/20/2012	07/20/2012	07/19/2012
Metals ug/Kg														
Aluminum (B)	6.9E+6	1,000	NA	1.09e+9 (D)	2,050,000	1,910,000	2,190,000	1,470,000	3,070,000	2,070,000	809,000	2,580,000	1,600,000	3,800,000
Arsenic	5,800	4,600	4,600	2,000,000	1,730	1,270	1,830	1,680	2,570	610	1,120	6,720	2,500	1,640
Cadmium (B)	1,200	6,000	5,900	2.30E+08	<200	<200	<200	590	310	<200	<200	3,140	340	<200
Chromium, Total	18,000 (total)	1.09E+9(D)	(G,X)	1.09e+9(D)	3,600	2,730	2,760	10,600	26,800	2,210	41,500	43,800	3,350	5,320
Cobalt	6,800	2,000	2,000	4.80E+07	2,860	3,440	4,100	1,710	1,800	1,740	1,870	3,430	2,410	3,670
Copper (B)	32,000	5.8E+6	1.30E+05	1.09e+9(D)	4,800	2,680	2,340	22,600	24,600	4,920	24,400	52,500	7,700	4,910
Iron (B)	1.2E+7	6,000	NA	1.09e+9(D)	4,650,000	2,980,000	3,540,000	6,540,000	5,570,000	3,380,000	24,100,000	8,870,000	4,260,000	7,100,000
Manganese (B)	4.4E+5	1,000	1.0E+5 (X)	1.80E+08	624,000	315,000	331,000	378,000	1,260,000	101,000	302,000	866,000	168,000	302,000
Mercury, Total	130	1,700	50 (M); 1.2	47,000	<50	<50	<50	162	65	<50	<50	104	<50	<50
Vanadium	NA	9.90E+05	4.30E+05	1.09e+9(D)	6,780	5,350	6,550	3,890	10,300	6,050	4,020	7,910	5,900	9,460
Zinc (B)	47,000	5.00E+06	2.90E+05	1.09e+9(D)	8,450	8,030	9,520	94,600	57,800	15,200	11,300	505,000	26,600	9,910

Analytical results compared to the MDEQ Part 201 Non-Residential Cleanup Criteria
Results in parts per billion (ppb)/micrograms per liter (ug/l)

Bold-exceeds the MDEQ Part 201 Non Residential Drinking Water Criteria
Shaded-Exceeds Non-Residential GSI Criteria
Underlined exceeds the Statewide Default Background Levels
Italic-Exceeds Groundwater Protection Criteria
Exceeds Direct Contact

NS - Not Sampled
NA - Not Analyzed or Not Applicable

GSI Criteria was calculated pursuant to the "Calculation of Generic Facility-Specific Part 201 GSI Criteria for (G) Hazardous Substances"
Facility Specific constituents include: Cadmium, Copper, Manganese and Zinc.

290 mg/CaCO3/L was used to calculate Facility Specific GSIP

Table 2
Groundwater Analytical Results
Davison Road Industrial Land
Burton, MI

Metals ug/L	Non-Residential Drinking Water Criteria and RBSLs	Non-Residential Groundwater Surface Water Interface Protection Criteria and RBSLs	Non-Residential Groundwater Contact Criteria and RBSLs	MW-1									MW-1-12									MW-2								
				8/8/12	11/6/12	4/23/13	7/24/13	9/23/14	4/14/15	8/4/15	11/16/15	2/23/16	8/8/12	11/6/12	4/23/13	7/25/13	9/23/14	4/14/15	8/4/15	11/16/15	2/23/16	8/10/12	11/8/12	4/22/13	7/24/13	9/23/15	4/16/15 *	8/4/15	11/17/15	2/29/16
Aluminum (B)	4,100	NA	6.4E+7	12	17	14	7	NS	NS	NS	NS	NS	194	14	11	349	NS	NS	NS	NS	NS	8	35	9	12	NS	NA	NA	NA	NA
Aluminum (B) (Dissolved)	4,100	NA	6.4E+7	NA	NA	NA	NA	NS	NS	NS	NS	NS	NA	NA	NA	NA	NS	NS	NS	NS	NS	NA	NA	NA	NA	NS	NA	NA	NA	NA
Arsenic (Total)	10 (A)	10	4,300	6	6	4	5	NS	NS	NS	NS	NS	<2	<2	<2	51	NS	NS	NS	NS	NS	102	104	15	26	NS	96	97	66	126
Arsenic (Dissolved)	10 (A)	10	4,300	NA	NA	NA	NA	NS	NS	NS	NS	NS	NA	NA	NA	NA	NS	NS	NS	NS	NS	NA	NA	NA	NA	NS	NA	4	62	97
Cadmium (B)	5.0 (A)	4.9	1.9E+5	<0.5	<0.5	<0.5	<0.5	NS	NS	NS	NS	NS	<0.5	<0.5	<0.5	<0.5	NS	NS	NS	NS	NS	<0.5	<0.5	<0.5	<0.5	NS	NA	NA	NA	NA
Cadmium (B) (Dissolved)	5.0 (A)	4.9	1.9E+5	NA	NA	NA	NA	NS	NS	NS	NS	NS	NA	NA	NA	NA	NS	NS	NS	NS	NS	NA	NA	NA	NA	NS	NA	NA	NA	NA
Calcium (Total)				NA	NA	NA	NA	NS	NS	NS	NS	NS	NA	NA	NA	NA	NS	NS	NS	NS	NS	NA	NA	NA	NA	NS	NA	NA	NA	NA
Chromium, Total	100 (A)	11	4.6E+5	<5	<5	<5	<5	NS	NS	NS	NS	NS	<5	<5	<5	<5	NS	NS	NS	NS	NS	<5	<5	<5	<5	NS	NA	NA	NA	NA
Chromium (Dissolved)	100 (A)	11	4.6E+5	NA	NA	NA	NA	NS	NS	NS	NS	NS	NA	NA	NA	NA	NS	NS	NS	NS	NS	NA	NA	NA	NA	NS	NA	NA	NA	NA
Cobalt	100	100	2.4E+6	<5	<5	<5	<5	NS	NS	NS	NS	NS	<5	<5	<5	<5	NS	NS	NS	NS	NS	<5	<5	<5	<5	NS	NA	NA	NA	NA
Cobalt (Dissolved)	100	100	2.4E+6	NA	NA	NA	NA	NS	NS	NS	NS	NS	NA	NA	NA	NA	NS	NS	NS	NS	NS	NA	NA	NA	NA	NS	NA	NA	NA	NA
Copper (B)	1,000 (E)	22	7.4E+6	<4	<4	<5	<4	NS	NS	NS	NS	NS	<4	<4	<5	5	NS	NS	NS	NS	NS	<4	<4	<5	<4	NS	NA	NA	NA	NA
Copper (B) (Dissolved)	1,000 (E)	22	7.4E+6	NA	NA	NA	NA	NS	NS	NS	NS	NS	NA	NA	NA	NA	NS	NS	NS	NS	NS	NA	NA	NA	NA	NS	NA	NA	NA	NA
Iron (B)	5,600(E)	NA	5.8E+7	1,270	1,040	1,590	1,360	NS	NS	NS	NS	NS	490	50	270	380	NS	NS	NS	NS	NS	25,800	25,100	16,600	20,500	NS	NA	NA	NA	NA
Iron (B) (Dissolved)	5,600(E)	NA	5.8E+7	NA	NA	NA	NA	NS	NS	NS	NS	NS	NA	NA	NA	NA	NS	NS	NS	NS	NS	NA	NA	NA	NA	NS	NA	NA	NA	NA
Magnesium (Total)	1.1E+06	NA	1.0E+9 (D)	NA	NA	NA	NA	NS	NS	NS	NS	NS	NA	NA	NA	NA	NS	NS	NS	NS	NS	NA	NA	NA	NA	NS	NA	NA	NA	NA
Manganese (B)	2,500 (E)	5,000	9.1E+6	1,590	582	1860	1,480	NS	NS	NS	NS	NS	226	27	<5	18	NS	NS	NS	NS	NS	3120	3,270	577	1,190	NS	NA	NA	NA	NA
Manganese (B) (Dissolved)	2,500 (E)	5,000	9.1E+6	NA	NA	NA	NA	NS	NS	NS	NS	NS	NA	NA	NA	NA	NS	NS	NS	NS	NS	NA	NA	NA	NA	NS	NA	NA	NA	NA
Mercury, Total	2.0 (A)	0.0013	56 (S)	<0.2	<0.2	<0.2	<0.2	NS	NS	NS	NS	NS	<0.2	<0.2	<0.2	<0.2	NS	NS	NS	NS	NS	<0.2	<0.2	<0.2	<0.2	NS	NA	NA	NA	NA
Mercury (Dissolved)	2.0 (A)	0.0013	56 (S)	NA	NA	NA	NA	NS	NS	NS	NS	NS	NA	NA	NA	NA	NS	NS	NS	NS	NS	NA	NA	NA	NA	NS	NA	NA	NA	NA
Vanadium	62	12	9.7E+5	<4	<4	<2	<4	NS	NS	NS	NS	NS	<4	<4	<4	<4	NS	NS	NS	NS	NS	6	6	<2	<4	NS	NA	NA	NA	NA
Vanadium (Dissolved)	62	12	9.7E+5	NA	NA	NA	NA	NS	NS	NS	NS	NS	NA	NA	NA	NA	NS	NS	NS	NS	NS	NA	NA	NA	NA	NS	NA	NA	NA	NA
Zinc (B)	5,000 (E)	290	1.1E+8	<5	6	<5	<5	NS	NS	NS	NS	NS	<5	<5	<5	<5	NS	NS	NS	NS	NS	<5	<5	<5	<5	NS	NA	NA	NA	NA
Zinc (B) (Dissolved)	5,000 (E)	290	1.1E+8	NA	NA	NA	NA	NS	NS	NS	NS	NS	NA	NA	NA	NA	NS	NS	NS	NS	NS	NA	NA	NA	NA	NS	NA	NA	NA	NA
Hardness				NA	NA	NA	NA	NS	NS	NS	NS	NS	NA	NA	NA	NA	NS	NS	NS	NS	NS	NA	NA	NA	NA	NS	NA	NA	NA	NA

NOTES:
VOC-All concentrations below laboratory detection limit
SVOC/PNAs-All concentrations below laboratory detection limit

Results in parts per billion (ppb)/micrograms per liter (ug/l)
Concentrations compared to the MDEQ Part 201 Non-Residential Cleanup Criteria

Bold-exceeds the MDEQ Part 201 Non-Residential Drinking Water Criteria
Shaded-Exceeds Non-Residential GSI Criteria
Shaded-MDEQ criteria for Total Arsenic

* Samples collected during the April 2015 sampling event were not collected using low flow sampling methodology. Low flow sampling methodology was used during all other sampling events.

Samples collected during the August 2015 sampling event were additionally analyzed for dissolved arsenic and /or zinc. Refer to the laboratory analytical report for results.

NS-Not Sampled
NA-Not Analyzed or Not Applicable
NS I H2O-Not Sampled Due to Insufficient Amount of Water
NS-CNL-Not Sampled Could Not Locate Well.

GSI Criteria was calculated pursuant to the "Calculation of Generic Facility-Specific Part 201 GSI Criteria for (G) Hazardous Substances"

Facility Specific constituents include: Cadmium, Copper, Manganese and Zinc.

290 mg/CaCO3/L was used to calculate Facility Specific GSI

Table 2
Groundwater Analytical Results
Davison Road Industrial Land
Burton, MI

Metals ug/L	Non-Residential Drinking Water Criteria and RBSLs	Non-Residential Groundwater Surface Water Interface Protection Criteria and RBSLs	Non-Residential Groundwater Contact Criteria and RBSLs	MW-2-12									MW-3-12									MW-4-12								
				8/8/12	11/6/12	4/23/13	7/25/13	9/23/14	4/14/15	8/4/15	11/16/15	2/23/16	8/9/12	11/6/12	4/17/13	7/24/13	9/23/14	4/15/15 *	8/5/15	11/18/15	2/23/16	8/9/12	11/6/12	4/17/13	7/24/13	9/23/14	4/15/15 *	8/5/15	11/18/15	2/23/16
Aluminum (B)	4,100	NA	6.4E+7	21	19	199	8	NS	NS	NS	NS	NS	37	26	56	15	NA	NA	NA	NA	NA	44	18	19	23	NA	NA	NA	NA	NA
Aluminum (B) (Dissolved)	4,100	NA	6.4E+7	NA	NA	NA	NA	NS	NS	NS	NS	NS	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Arsenic (Total)	10 (A)	10	4,300	2	<2	<2	<2	NS	NS	NS	NS	NS	25	19	2	13	25	52	14	10	8	5	12	<2	3	4	18	<2	3	7
Arsenic (Dissolved)	10 (A)	10	4,300	NA	NA	NA	NA	NS	NS	NS	NS	NS	NA	NA	NA	NA	NA	NA	4	9	7	NA	NA	NA	NA	NA	NA	3	<2	<2
Cadmium (B)	5.0 (A)	4.9	1.9E+5	<0.5	<0.5	<0.5	<0.5	NS	NS	NS	NS	NS	<0.5	<0.5	<0.5	<0.5	NA	NA	NA	NA	NA	<0.5	<0.5	<0.5	<0.5	NA	NA	NA	NA	NA
Cadmium (B) (Dissolved)	5.0 (A)	4.9	1.9E+5	NA	NA	NA	NA	NS	NS	NS	NS	NS	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Calcium (Total)				NA	NA	NA	NA	NS	NS	NS	NS	NS	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Chromium, Total	100 (A)	11	4.6E+5	<5	<5	<5	<5	NS	NS	NS	NS	NS	<5	<5	<5	<5	NA	NA	NA	NA	NA	<5	<5	<5	<5	NA	NA	NA	NA	NA
Chromium (Dissolved)	100 (A)	11	4.6E+5	NA	NA	NA	NA	NS	NS	NS	NS	NS	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Cobalt	100	100	2.4E+6	<5	<5	<5	<5	NS	NS	NS	NS	NS	<5	<5	<5	<5	NA	NA	NA	NA	NA	<5	<5	<5	<5	NA	NA	NA	NA	NA
Cobalt (Dissolved)	100	100	2.4E+6	NA	NA	NA	NA	NS	NS	NS	NS	NS	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Copper (B)	1,000 (E)	22	7.4E+6	<4	<4	<5	<4	NS	NS	NS	NS	NS	<4	<4	<5	<4	NA	NA	NA	NA	NA	<4	<4	6	<4	NA	NA	NA	NA	NA
Copper (B) (Dissolved)	1,000 (E)	22	7.4E+6	NA	NA	NA	NA	NS	NS	NS	NS	NS	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Iron (B)	5,600(E)	NA	5.8E+7	180	20	2,100	470	NS	NS	NS	NS	NS	6,170	5,000	410	3,480	NA	NA	NA	NA	NA	330	5,310	640	410	NA	NA	NA	NA	NA
Iron (B) (Dissolved)	5,600(E)	NA	5.8E+7	NA	NA	NA	NA	NS	NS	NS	NS	NS	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Magnesium (Total)	1.1E+06	NA	1.0E+9 (D)	NA	NA	NA	NA	NS	NS	NS	NS	NS	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Manganese (B)	2,500 (E)	5,000	9.1E+6	347	8	30	69	NS	NS	NS	NS	NS	823	523	73	855	NA	NA	NA	NA	NA	417	351	164	1,680	NA	NA	NA	NA	NA
Manganese (B) (Dissolved)	2,500 (E)	5,000	9.1E+6	NA	NA	NA	NA	NS	NS	NS	NS	NS	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Mercury, Total	2.0 (A)	0.0013	56 (S)	<0.2	<0.2	<0.2	<0.2	NS	NS	NS	NS	NS	<0.2	<0.2	<0.2	<0.2	NA	NA	NA	NA	NA	<0.2	<0.2	<0.2	<0.2	NA	NA	NA	NA	NA
Mercury (Dissolved)	2.0 (A)	0.0013	56 (S)	NA	NA	NA	NA	NS	NS	NS	NS	NS	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Vanadium	62	12	9.7E+5	<4	<4	<2	<4	NS	NS	NS	NS	NS	<4	<4	<2	<4	NA	NA	NA	NA	NA	<4	<4	<2	<4	NA	NA	NA	NA	NA
Vanadium (Dissolved)	62	12	9.7E+5	NA	NA	NA	NA	NS	NS	NS	NS	NS	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Zinc (B)	5,000 (E)	290	1.1E+8	<5	<5	10	<5	NS	NS	NS	NS	NS	10	<5	<5	<5	NA	NA	NA	NA	NA	<5	6	<5	<5	NA	NA	NA	NA	NA
Zinc (B) (Dissolved)	5,000 (E)	290	1.1E+8	NA	NA	NA	NA	NS	NS	NS	NS	NS	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Hardness				NA	NA	NA	NA	NS	NS	NS	NS	NS	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

NOTES:

VOC-All concentrations below laboratory detection limit

SVOC/PNAs-All concentrations below laboratory detection limit

Results in parts per billion (ppb)/micrograms per liter (ug/l)

Concentrations compared to the MDEQ Part 201 Non-Residential Cleanup Criteria

Bold-exceeds the MDEQ Part 201 Non-Residential Drinking Water Criteria

Shaded-Exceeds Non-Residential GSI Criteria

Shaded-MDEQ criteria for Total Arsenic

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Facility Specific constituents include: Cadmium, Copper, Manganese and Zinc.

290 mg/CaCO3/L was used to calculate Facility Specific GSI

Table 2
Groundwater Analytical Results
Davison Road Industrial Land
Burton, MI

Metals ug/L	Non-Residential Drinking Water Criteria and RBSLs	Non-Residential Groundwater Surface Water Interface Protection Criteria and RBSLs	Non-Residential Groundwater Contact Criteria and RBSLs	MW-4-04									MW-5-12									MW-6-12								
				8/9/12	11/6/12	4/23/13	7/25/13	9/23/14	4/14/15	8/5/15	11/16/15	2/23/16	8/10/12	11/8/12	4/23/13	7/24/13	9/23/14	4/14/15	8/5/15	11/16/15	2/23/16	8/10/12	11/6/12	4/23/13	7/25/13	9/23/14	4/14/15 *	8/4/15	11/16/15	2/29/16
Aluminum (B)	4,100	NA	6.4E+7	509	NS-I H2O	30	6	NS	NS	NS	NS	NS	8	NA	38	11	NS	NS	NS	NS	NS	32	73	32	11	NS	NA	NA	NA	NA
Aluminum (B) (Dissolved)	4,100	NA	6.4E+7	NA	NS-I H2O	NA	NA	NS	NS	NS	NS	NS	NA	13	NA	NA	NS	NS	NS	NS	NS	5	NA	NA	NA	NS	NA	NA	NA	NA
Arsenic (Total)	10 (A)	10	4,300	8	NS-I H2O	<2	<2	NS	NS	NS	NS	NS	3	NA	<2	<2	NS	NS	NS	NS	NS	19	29	2	10	NS	85	3	3	<2
Arsenic (Dissolved)	10 (A)	10	4,300	NA	NS-I H2O	NA	NA	NS	NS	NS	NS	NS	NA	<2	NA	NA	NS	NS	NS	NS	NS	19	NA	NA	NA	NS	NA	<2	<2	<2
Cadmium (B)	5.0 (A)	4.9	1.9E+5	1.1	NS-I H2O	<0.5	<0.5	NS	NS	NS	NS	NS	<0.5	NA	<0.5	<0.5	NS	NS	NS	NS	NS	<0.5	<0.5	<0.5	<0.5	NS	NA	NA	NA	NA
Cadmium (B) (Dissolved)	5.0 (A)	4.9	1.9E+5	NA	NS-I H2O	NA	NA	NS	NS	NS	NS	NS	NA	<0.5	NA	NA	NS	NS	NS	NS	NS	<0.5	NA	NA	NA	NS	NA	NA	NA	NA
Calcium (Total)				NA	NS-I H2O	NA	NA	NS	NS	NS	NS	NS	NA	NA	NA	NA	NS	NS	NS	NS	NS	NA	NA	NA	NA	NS	NA	NA	NA	NA
Chromium, Total	100 (A)	11	4.6E+5	<5	NS-I H2O	<5	<5	NS	NS	NS	NS	NS	<5	NA	<5	<5	NS	NS	NS	NS	NS	<5	<5	<5	<5	NS	NA	NA	NA	NA
Chromium (Dissolved)	100 (A)	11	4.6E+5	NA	NS-I H2O	NA	NA	NS	NS	NS	NS	NS	NA	<5	NA	NA	NS	NS	NS	NS	NS	<5	NA	NA	NA	NS	NA	NA	NA	NA
Cobalt	100	100	2.4E+6	23	NS-I H2O	<5	<5	NS	NS	NS	NS	NS	<5	NA	<5	<5	NS	NS	NS	NS	NS	<5	<5	<5	7	NS	NA	NA	NA	NA
Cobalt (Dissolved)	100	100	2.4E+6	NA	NS-I H2O	NA	NA	NS	NS	NS	NS	NS	NA	<5	NA	NA	NS	NS	NS	NS	NS	<5	NA	NA	NA	NS	NA	NA	NA	NA
Copper (B)	1,000 (E)	22	7.4E+6	22	NS-I H2O	100	<4	NS	NS	NS	NS	NS	<4	NA	<5	17	NS	NS	NS	NS	NS	<4	<4	<5	<4	NS	NA	NA	NA	NA
Copper (B) (Dissolved)	1,000 (E)	22	7.4E+6	NA	NS-I H2O	NA	NA	NS	NS	NS	NS	NS	NA	<4	NA	NA	NS	NS	NS	NS	NS	<4	NA	NA	NA	NS	NA	NA	NA	NA
Iron (B)	5,600(E)	NA	5.8E+7	9,360	NS-I H2O	2,310	320	NS	NS	NS	NS	NS	16,600	NA	770	5,550	NS	NS	NS	NS	NS	10,200	11,200	3,570	7,420	NS	NA	NA	NA	NA
Iron (B) (Dissolved)	5,600(E)	NA	5.8E+7	NA	NS-I H2O	NA	NA	NS	NS	NS	NS	NS	NA	5,320	NA	NA	NS	NS	NS	NS	NS	9,910	NA	NA	NA	NS	NA	NA	NA	NA
Magnesium (Total)	1.1E+06	NA	1.0E+9 (D)	NA	NS-I H2O	NA	NA	NS	NS	NS	NS	NS	NA	NA	NA	NA	NS	NS	NS	NS	NS	NA	NA	NA	NA	NS	NA	NA	NA	NA
Manganese (B)	2,500 (E)	5,000	9.1E+6	4,740	NS-I H2O	140	252	NS	NS	NS	NS	NS	1,540	NA	596	1100	NS	NS	NS	NS	NS	1,020	878	2,270	3,880	NS	NA	NA	NA	NA
Manganese (B) (Dissolved)	2,500 (E)	5,000	9.1E+6	NA	NS-I H2O	NA	NA	NS	NS	NS	NS	NS	NA	1,830	NA	NA	NS	NS	NS	NS	NS	989	NA	NA	NA	NS	NA	NA	NA	NA
Mercury, Total	2.0 (A)	0.0013	56 (S)	<0.2	NS-I H2O	<0.2	<0.2	NS	NS	NS	NS	NS	<0.2	NA	<0.2	<0.2	NS	NS	NS	NS	NS	<0.2	<0.2	<0.2	<0.2	NS	NA	NA	NA	NA
Mercury (Dissolved)	2.0 (A)	0.0013	56 (S)	NA	NS-I H2O	NA	NA	NS	NS	NS	NS	NS	NA	<0.2	NA	NA	NS	NS	NS	NS	NS	<0.2	NA	NA	NA	NS	NA	NA	NA	NA
Vanadium	62	12	9.7E+5	5	NS-I H2O	<2	<4	NS	NS	NS	NS	NS	<4	NA	<2	<4	NS	NS	NS	NS	NS	<4	<4	<2	<4	NS	NA	NA	NA	NA
Vanadium (Dissolved)	62	12	9.7E+5	NA	NS-I H2O	NA	NA	NS	NS	NS	NS	NS	NA	<4	NA	NA	NS	NS	NS	NS	NS	<4	NA	NA	NA	NS	NA	NA	NA	NA
Zinc (B)	5,000 (E)	290	1.1E+8	65	NS-I H2O	9	<5	NS	NS	NS	NS	NS	<5	NA	<5	<5	NS	NS	NS	NS	NS	<5	<5	<5	<5	NS	NA	NA	NA	NA
Zinc (B) (Dissolved)	5,000 (E)	290	1.1E+8	NA	NS-I H2O	NA	NA	NS	NS	NS	NS	NS	NA	6	NA	NA	NS	NS	NS	NS	NS	<5	NA	NA	NA	NS	NA	NA	NA	NA
Hardness				NA	NS-I H2O	NA	NA	NS	NS	NS	NS	NS	NA	NA	NA	NA	NS	NS	NS	NS	NS	NA	NA	NA	NA	NS	NA	NA	NA	NA

NOTES:
VOC-All concentrations below laboratory detection limit
SVOC/PNAs-All concentrations below laboratory detection limit

Results in parts per billion (ppb)/micrograms per liter (ug/l)
Concentrations compared to the MDEQ Part 201 Non-Residential Cleanup Criteria

Bold-exceeds the MDEQ Part 201 Non-Residential Drinking Water Criteria
Shaded-Exceeds Non-Residential GSI Criteria
Shaded-MDEQ criteria for Total Arsenic

* Samples collected during the April 2015 sampling event were not collected using low flow sampling methodology. Low flow sampling methodology was used during all other sampling events.

Samples collected during the August 2015 sampling event were additionally analyzed for dissolved arsenic and /or zinc. Refer to the laboratory analytical report for results.

NS-Not Sampled
NA-Not Analyzed or Not Applicable
NS I H2O-Not Sampled Due to Insufficient Amount of Water
NS-CNL-Not Sampled Could Not Locate Well.

GSI Criteria was calculated pursuant to the "Calculation of Generic Facility-Specific Part 201 GSI Criteria for (G) Hazardous Substances"

Facility Specific constituents include: Cadmium, Copper, Manganese and Zinc.

290 mg/CaCO3/L was used to calculate Facility Specific GSI

Table 2
Groundwater Analytical Results
Davison Road Industrial Land
Burton, MI

Metals ug/L	Non-Residential Drinking Water Criteria and RBSLs	Non-Residential Groundwater Surface Water Interface Protection Criteria and RBSLs	Non-Residential Groundwater Contact Criteria and RBSLs	MW-7-12									MW-8-12									MW-9-12								
				8/9/12	11/6/12	4/17/13	7/24/13	9/24/14	4/16/15 *	8/5/15	11/18/15	2/29/16	8/9/12	11/6/12	4/17/13	7/25/13	9/23/14	4/16/15 *	8/5/15	11/18/15	2/23/16	8/9/12	11/8/12	4/16/13	7/23/13	9/24/14	4/16/15 *	8/5/15	11/17/15	2/29/16
Aluminum (B)	4,100	NA	6.4E+7	25	17	45	11	NA	NA	NA	NA	NA	13	NS-I H2O	14	144	NS	NA	NS-I H2O	NA	NA	31	NA	14	30	NA	NA	NA	NA	NA
Aluminum (B) (Dissolved)	4,100	NA	6.4E+7	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NS-I H2O	NA	NA	NS	NA	NS-I H2O	NA	NA	NA	<5	NA	NA	NA	NA	NA	NA	NA
Arsenic (Total)	10 (A)	10	4,300	3	2	<2	<2	<2	20	<2	<2	<2	39	NS-I H2O	<2	<2	NS	7	NS-I H2O	89	<2	3	NA	<2	6	23	21	3	5	<2
Arsenic (Dissolved)	10 (A)	10	4,300	NA	NA	NA	NA	NA	<2	<2	<2	<2	NA	NS-I H2O	NA	NA	NS	NA	NS-I H2O	NS-I H2O	<2	NA	22	NA	NA	NA	NA	2	<2	<2
Cadmium (B)	5.0 (A)	4.9	1.9E+5	<0.5	<0.5	<0.5	<0.5	NA	NA	NA	NA	NA	<0.5	NS-I H2O	<0.5	<0.5	NS	NA	NS-I H2O	NA	NA	<0.5	NA	<0.5	<0.5	NA	NA	NA	NA	NA
Cadmium (B) (Dissolved)	5.0 (A)	4.9	1.9E+5	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NS-I H2O	NA	NA	NS	NA	NS-I H2O	NA	NA	NA	<0.5	NA	NA	NA	NA	NA	NA	NA
Calcium (Total)				NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NS-I H2O	NA	NA	NS	NA	NS-I H2O	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Chromium, Total	100 (A)	11	4.6E+5	<5	<5	<5	<5	NA	NA	NA	NA	NA	<5	NS-I H2O	<5	<5	NS	NA	NS-I H2O	NA	NA	<5	NA	<5	<5	NA	NA	NA	NA	NA
Chromium (Dissolved)	100 (A)	11	4.6E+5	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NS-I H2O	NA	NA	NS	NA	NS-I H2O	NA	NA	NA	<5	NA	NA	NA	NA	NA	NA	NA
Cobalt	100	100	2.4E+6	<5	<5	<5	<5	NA	NA	NA	NA	NA	<5	NS-I H2O	<5	<5	NS	NA	NS-I H2O	NA	NA	<5	NA	<5	<5	NA	NA	NA	NA	NA
Cobalt (Dissolved)	100	100	2.4E+6	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NS-I H2O	NA	NA	NS	NA	NS-I H2O	NA	NA	NA	<5	NA	NA	NA	NA	NA	NA	NA
Copper (B)	1,000 (E)	22	7.4E+6	<4	<4	10	<4	NA	NA	NA	NA	NA	<4	NS-I H2O	<5	<4	NS	NA	NS-I H2O	NA	NA	<4	NA	<5	<4	NA	NA	NA	NA	NA
Copper (B) (Dissolved)	1,000 (E)	22	7.4E+6	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NS-I H2O	NA	NA	NS	NA	NS-I H2O	NA	NA	NA	<4	NA	NA	NA	NA	NA	NA	NA
Iron (B)	5,600(E)	NA	5.8E+7	120	180	910	100	NA	NA	NA	NA	NA	23,700	NS-I H2O	440	700	NS	NA	NS-I H2O	NA	NA	90	NA	100	2,040	NA	NA	NA	NA	NA
Iron (B) (Dissolved)	5,600(E)	NA	5.8E+7	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NS-I H2O	NA	NA	NS	NA	NS-I H2O	NA	NA	NA	3,640	NA	NA	NA	NA	NA	NA	NA
Magnesium (Total)	1.1E+06	NA	1.0E+9 (D)	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NS-I H2O	NA	NA	NS	NA	NS-I H2O	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Manganese (B)	2,500 (E)	5,000	9.1E+6	29	128	<5	266	NA	NA	NA	NA	NA	4,600	NS-I H2O	47	269	NS	NA	NS-I H2O	NA	NA	162	NA	256	376	NA	NA	NA	NA	NA
Manganese (B) (Dissolved)	2,500 (E)	5,000	9.1E+6	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NS-I H2O	NA	NA	NS	NA	NS-I H2O	NA	NA	NA	219	NA	NA	NA	NA	NA	NA	NA
Mercury, Total	2.0 (A)	0.0013	56 (S)	<0.2	<0.2	<0.2	<0.2	NA	NA	NA	NA	NA	<0.2	NS-I H2O	<0.2	<0.2	NS	NA	NS-I H2O	NA	NA	<0.2	NA	<0.2	<0.2	NA	NA	NA	NA	NA
Mercury (Dissolved)	2.0 (A)	0.0013	56 (S)	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NS-I H2O	NA	NA	NS	NA	NS-I H2O	NA	NA	NA	<0.2	NA	NA	NA	NA	NA	NA	NA
Vanadium	62	12	9.7E+5	<4	<4	<2	<4	NA	NA	NA	NA	NA	<4	NS-I H2O	<2	<4	NS	NA	NS-I H2O	NA	NA	<4	NA	<2	<4	NA	NA	NA	NA	NA
Vanadium (Dissolved)	62	12	9.7E+5	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NS-I H2O	NA	NA	NS	NA	NS-I H2O	NA	NA	NA	<4	NA	NA	NA	NA	NA	NA	NA
Zinc (B)	5,000 (E)	290	1.1E+8	<5	<5	<5	<5	NA	NA	NA	NA	NA	<5	NS-I H2O	<5	9	NS	NA	NS-I H2O	NA	NA	<5	NA	<5	<5	NA	NA	NA	NA	NA
Zinc (B) (Dissolved)	5,000 (E)	290	1.1E+8	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NS-I H2O	NA	NA	NS	NA	NS-I H2O	NA	NA	NA	<5	NA	NA	NA	NA	NA	NA	NA
Hardness				NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NS-I H2O	NA	NA	NS	NA	NS-I H2O	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

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Table 2
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Davison Road Industrial Land
Burton, MI

Metals ug/L	Non-Residential Drinking Water Criteria and RBSLs	Non-Residential Groundwater Surface Water Interface Protection Criteria and RBSLs	Non-Residential Groundwater Contact Criteria and RBSLs	MW-10-12									MW-11-12									MW-12-12								
				8/10/12	11/8/12	4/16/13	7/25/13	9/23/14	4/16/15 *	8/4/15	11/18/15	2/29/16	8/9/12	11/6/12	4/18/13	7/23/13	9/25/14	4/16/15 *	8/4/15	11/17/15	2/29/16	8/9/12	11/8/12	4/22/13	7/23/13	9/24/14	4/16/15 *	8/4/15	11/17/15	2/29/16
Aluminum (B)	4,100	NA	6.4E+7	19	NS-I H2O	12	11	NS	NA	NA	NA	NA	NS-I H2O	NS-I H2O	13	11	NA	NA	NA	NA	NA	13	13	44	12	NA	NA	NA	NA	NA
Aluminum (B) (Dissolved)	4,100	NA	6.4E+7	NA	NS-I H2O	NA	NA	NS	NA	NA	NA	NA	NS-I H2O	NS-I H2O	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Arsenic (Total)	10 (A)	10	4,300	166	NS-I H2O	19	51	NS	33	92	819	30	NS-I H2O	NS-I H2O	<2	<2	3	5	4	4	<2	39	31	29	26	53	100	31	39	45
Arsenic (Dissolved)	10 (A)	10	4,300	NA	NS-I H2O	NA	NA	NS	NA	77	112	20	NS-I H2O	NS-I H2O	NA	NA	NA	NA	3	26	<2	NA	NA	NA	NA	NA	NA	<2	36	19
Cadmium (B)	5.0 (A)	4.9	1.9E+5	<0.5	NS-I H2O	<0.5	<0.5	NS	NA	NA	NA	NA	NS-I H2O	NS-I H2O	<0.5	<0.5	NA	NA	NA	NA	NA	<0.5	<0.5	<0.5	<0.5	NA	NA	NA	NA	NA
Cadmium (B) (Dissolved)	5.0 (A)	4.9	1.9E+5	NA	NS-I H2O	NA	NA	NS	NA	NA	NA	NA	NS-I H2O	NS-I H2O	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Calcium (Total)				NA	NS-I H2O	NA	NA	NS	NA	NA	NA	NA	NS-I H2O	NS-I H2O	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Chromium, Total	100 (A)	11	4.6E+5	<5	NS-I H2O	<5	<5	NS	NA	NA	NA	NA	NS-I H2O	NS-I H2O	<5	<5	NA	NA	NA	NA	NA	<5	<5	<5	<5	NA	NA	NA	NA	NA
Chromium (Dissolved)	100 (A)	11	4.6E+5	NA	NS-I H2O	NA	NA	NS	NA	NA	NA	NA	NS-I H2O	NS-I H2O	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Cobalt	100	100	2.4E+6	<5	NS-I H2O	<5	<5	NS	NA	NA	NA	NA	NS-I H2O	NS-I H2O	<5	<5	NA	NA	NA	NA	NA	<5	<5	<5	<5	NA	NA	NA	NA	NA
Cobalt (Dissolved)	100	100	2.4E+6	NA	NS-I H2O	NA	NA	NS	NA	NA	NA	NA	NS-I H2O	NS-I H2O	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Copper (B)	1,000 (E)	22	7.4E+6	<4	NS-I H2O	<5	<4	NS	NA	NA	NA	NA	NS-I H2O	NS-I H2O	<5	<4	NA	NA	NA	NA	NA	<4	<4	<5	<4	NA	NA	NA	NA	NA
Copper (B) (Dissolved)	1,000 (E)	22	7.4E+6	NA	NS-I H2O	NA	NA	NS	NA	NA	NA	NA	NS-I H2O	NS-I H2O	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Iron (B)	5,600(E)	NA	5.8E+7	21,700	NS-I H2O	11,600	11,200	NS	NA	NA	NA	NA	NS-I H2O	NS-I H2O	700	160	NA	NA	NA	NA	NA	23,700	25,100	34,200	27,700	NA	NA	NA	NA	NA
Iron (B) (Dissolved)	5,600(E)	NA	5.8E+7	NA	NS-I H2O	NA	NA	NS	NA	NA	NA	NA	NS-I H2O	NS-I H2O	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Magnesium (Total)	1.1E+06	NA	1.0E+9 (D)	NA	NS-I H2O	NA	NA	NS	NA	NA	NA	NA	NS-I H2O	NS-I H2O	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Manganese (B)	2,500 (E)	5,000	9.1E+6	1,570	NS-I H2O	2,170	1,640	NS	NA	NA	NA	NA	NS-I H2O	NS-I H2O	247	1,040	NA	NA	NA	NA	NA	4,600	4,610	5,180	4,940	NA	NA	NA	NA	NA
Manganese (B) (Dissolved)	2,500 (E)	5,000	9.1E+6	NA	NS-I H2O	NA	NA	NS	NA	NA	NA	NA	NS-I H2O	NS-I H2O	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Mercury, Total	2.0 (A)	0.0013	56 (S)	<0.2	NS-I H2O	<0.2	<0.2	NS	NA	NA	NA	NA	NS-I H2O	NS-I H2O	<0.2	<0.2	NA	NA	NA	NA	NA	<0.2	<0.2 *	<0.2	<0.2	NA	NA	NA	NA	NA
Mercury (Dissolved)	2.0 (A)	0.0013	56 (S)	NA	NS-I H2O	NA	NA	NS	NA	NA	NA	NA	NS-I H2O	NS-I H2O	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Vanadium	62	12	9.7E+5	<4	NS-I H2O	<2	<4	NS	NA	NA	NA	NA	NS-I H2O	NS-I H2O	<2	<4	NA	NA	NA	NA	NA	<4	<4	<4	<4	NA	NA	NA	NA	NA
Vanadium (Dissolved)	62	12	9.7E+5	NA	NS-I H2O	NA	NA	NS	NA	NA	NA	NA	NS-I H2O	NS-I H2O	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Zinc (B)	5,000 (E)	290	1.1E+8	14	NS-I H2O	<5	<5	NS	NA	NA	NA	NA	NS-I H2O	NS-I H2O	<5	<5	NA	NA	NA	NA	NA	<5	<5	<5	<5	NA	NA	NA	NA	NA
Zinc (B) (Dissolved)	5,000 (E)	290	1.1E+8	NA	NS-I H2O	NA	NA	NS	NA	NA	NA	NA	NS-I H2O	NS-I H2O	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Hardness				NA	NS-I H2O	NA	NA	NS	NA	NA	NA	NA	NS-I H2O	NS-I H2O	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

NOTES:
VOC-All concentrations below laboratory detection limit
SVOC/PNAs-All concentrations below laboratory detection limit

Results in parts per billion (ppb)/micrograms per liter (ug/l)

Concentrations compared to the MDEQ Part 201 Non-Residential Cleanup Criteria

Bold-exceeds the MDEQ Part 201 Non-Residential Drinking Water Criteria
Shaded-Exceeds Non-Residential GSI Criteria
Shaded-MDEQ criteria for Total Arsenic

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Facility Specific constituents include: Cadmium, Copper, Manganese and Zinc.

290 mg/CaCO3/L was used to calculate Facility Specific GSI

Table 2
Groundwater Analytical Results
Davison Road Industrial Land
Burton, MI

Metals ug/L	Non-Residential Drinking Water Criteria and RBSLs	Non-Residential Groundwater Surface Water Interface Protection Criteria and RBSLs	Non-Residential Groundwater Contact Criteria and RBSLs	MW-13-12									MW-14-12									SB/MW-15-14				
				8/9/12	11/6/12	4/22/13	7/23/13	9/24/14	4/14/15	8/5/15	11/16/15	2/23/16	8/9/12	11/6/12	4/22/13	7/23/13	9/24/14	4/14/15	8/5/15	11/16/15	2/23/16	9/25/14	4/16/15 *	8/4/15	11/17/15	2/29/16
Aluminum (B)	4,100	NA	6.4E+7	12	7	13	27	NA	NS	NS	NS	NS	38	16	8	22	NA	NS	NS	NS	NS	44	NA	NA	NA	NA
Aluminum (B) (Dissolved)	4,100	NA	6.4E+7	NA	NA	NA	NA	NA	NS	NS	NS	NS	NA	NA	NA	NA	NA	NS	NS	NS	NS	NA	NA	NA	NA	NA
Arsenic (Total)	10 (A)	10	4,300	<2	3	<2	<2	7	NS	NS	NS	NS	<2	<2	<2	<2	<2	NS	NS	NS	NS	30	45	23	22	12
Arsenic (Dissolved)	10 (A)	10	4,300	NA	NA	NA	NA	NA	NS	NS	NS	NS	NA	NA	NA	NA	NA	NS	NS	NS	NS	NA	NA	5	21	12
Cadmium (B)	5.0 (A)	4.9	1.9E+5	<0.5	<0.5	<0.5	<0.5	NA	NS	NS	NS	NS	<0.5	<0.5	<0.5	<0.5	NA	NS	NS	NS	NS	<0.5	NA	NA	NA	NA
Cadmium (B) (Dissolved)	5.0 (A)	4.9	1.9E+5	NA	NA	NA	NA	NA	NS	NS	NS	NS	NA	NA	NA	NA	NA	NS	NS	NS	NS	NA	NA	NA	NA	NA
Calcium (Total)				NA	NA	NA	NA	NA	NS	NS	NS	NS	NA	NA	100,000	NA	NA	NS	NS	NS	NS	NA	NA	NA	NA	NA
Chromium, Total	100 (A)	11	4.6E+5	<5	<5	<5	<5	NA	NS	NS	NS	NS	<5	<5	<5	<5	NA	NS	NS	NS	NS	<5	NA	NA	NA	NA
Chromium (Dissolved)	100 (A)	11	4.6E+5	NA	NA	NA	NA	NA	NS	NS	NS	NS	NA	NA	NA	NA	NA	NS	NS	NS	NS	NA	NA	NA	NA	NA
Cobalt	100	100	2.4E+6	<5	<5	<5	<5	NA	NS	NS	NS	NS	<5	<5	<5	<5	NA	NS	NS	NS	NS	<5	NA	NA	NA	NA
Cobalt (Dissolved)	100	100	2.4E+6	NA	NA	NA	NA	NA	NS	NS	NS	NS	NA	NA	NA	NA	NA	NS	NS	NS	NS	NA	NA	NA	NA	NA
Copper (B)	1,000 (E)	22	7.4E+6	<4	<4	<5	<4	NA	NS	NS	NS	NS	<4	<4	<4	<4	NA	NS	NS	NS	NS	<5	NA	NA	NA	NA
Copper (B) (Dissolved)	1,000 (E)	22	7.4E+6	NA	NA	NA	NA	NA	NS	NS	NS	NS	NA	NA	NA	NA	NA	NS	NS	NS	NS	NA	NA	NA	NA	NA
Iron (B)	5,600(E)	NA	5.8E+7	70	1,360	440	360	NA	NS	NS	NS	NS	60	40	330	20	NA	NS	NS	NS	NS	2,960	NA	NA	NA	NA
Iron (B) (Dissolved)	5,600(E)	NA	5.8E+7	NA	NA	NA	NA	NA	NS	NS	NS	NS	NA	NA	NA	NA	NA	NS	NS	NS	NS	NA	NA	NA	NA	NA
Magnesium (Total)	1.1E+06	NA	1.0E+9 (D)	NA	NA	NA	NA	NA	NS	NS	NS	NS	NA	NA	29,400	NA	NA	NS	NS	NS	NS	NA	NA	NA	NA	NA
Manganese (B)	2,500 (E)	5,000	9.1E+6	304	626	<5	291	NA	NS	NS	NS	NS	184	92	110	22	NA	NS	NS	NS	NS	57	NA	NA	NA	NA
Manganese (B) (Dissolved)	2,500 (E)	5,000	9.1E+6	NA	NA	NA	NA	NA	NS	NS	NS	NS	NA	NA	NA	NA	NA	NS	NS	NS	NS	NA	NA	NA	NA	NA
Mercury, Total	2.0 (A)	0.0013	56 (S)	<0.2	<0.2	<0.2	<0.2	NA	NS	NS	NS	NS	<0.2	<0.2 *	<0.2	<0.2	NA	NS	NS	NS	NS	<0.2	NA	NA	NA	NA
Mercury (Dissolved)	2.0 (A)	0.0013	56 (S)	NA	NA	NA	NA	NA	NS	NS	NS	NS	NA	NA	NA	NA	NA	NS	NS	NS	NS	NA	NA	NA	NA	NA
Vanadium	62	12	9.7E+5	<4	<4	<2	<4	NA	NS	NS	NS	NS	<4	<4	<2.0	<4	NA	NS	NS	NS	NS	<4	NA	NA	NA	NA
Vanadium (Dissolved)	62	12	9.7E+5	NA	NA	NA	NA	NA	NS	NS	NS	NS	NA	NA	NA	NA	NA	NS	NS	NS	NS	NA	NA	NA	NA	NA
Zinc (B)	5,000 (E)	290	1.1E+8	<5	<5	<5	<5	NA	NS	NS	NS	NS	<5	11	<5.0	<5	NA	NS	NS	NS	NS	<5	NA	NA	NA	NA
Zinc (B) (Dissolved)	5,000 (E)	290	1.1E+8	NA	NA	NA	NA	NA	NS	NS	NS	NS	NA	NA	NA	NA	NA	NS	NS	NS	NS	NA	NA	NA	NA	NA
Hardness				NA	NA	NA	NA	NA	NS	NS	NS	NS	NA	NA	NA	NA	NA	NS	NS	NS	NS	NA	NA	NA	NA	NA

NOTES:
VOC-All concentrations below laboratory detection limit
SVOC/PNAs-All concentrations below laboratory detection limit

Results in parts per billion (ppb)/micrograms per liter (ug/l)
Concentrations compared to the MDEQ Part 201 Non-Residential Cleanup Criteria

Bold-exceeds the MDEQ Part 201 Non-Residential Drinking Water Criteria
Shaded-Exceeds Non-Residential GSI Criteria
Shaded-MDEQ criteria for Total Arsenic

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Facility Specific constituents include: Cadmium, Copper, Manganese and Zinc.

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Table 2
Groundwater Analytical Results
Davison Road Industrial Land
Burton, MI

Metals ug/L	Non-Residential Drinking Water Criteria and RBSLs	Non-Residential Groundwater Surface Water Interface Protection Criteria and RBSLs	Non-Residential Groundwater Contact Criteria and RBSLs	SB/MW-16-14					TMW-1								TMW-6									
				9/25/14	4/15/15 *	8/4/15	11/18/15	2/23/16	8/9/12	11/8/12	4/17/13	7/24/13	9/24/14	4/15/15 *	8/5/15	11/18/15	2/23/16	8/10/12	11/8/12	4/18/13	7/23/13	9/25/14	4/16/15 *	8/4/15	11/17/15	2/29/16
Aluminum (B)	4,100	NA	6.4E+7	NA	NA	NA	NA	NA	29	NA	14	15	NA	NA	NA	NA	NA	211	NA	59	33	NA	NA	NA	NA	NA
Aluminum (B) (Dissolved)	4,100	NA	6.4E+7	NA	NA	NA	NA	NA	NA	20	NA	NA	NA	NA	NA	NA	NA	NA	59	NA	NA	NA	NA	NA	NA	NA
Arsenic (Total)	10 (A)	10	4,300	15	68	7	13	25	3	NA	<2	4	5	9	<2	2	<2	9	NA	<2	2	8	4	4	4	<2
Arsenic (Dissolved)	10 (A)	10	4,300	NA	NA	10	12	20	NA	<2	NA	NA	NA	NA	3	<2	<2	NA	<2	NA	NA	NA	NA	<2	4	<2
Cadmium (B)	5.0 (A)	4.9	1.9E+5	NA	NA	NA	NA	NA	<0.5	NA	<0.5	<0.5	NA	NA	NA	NA	NA	0.6	NA	<0.5	<0.5	NA	NA	NA	NA	NA
Cadmium (B) (Dissolved)	5.0 (A)	4.9	1.9E+5	NA	NA	NA	NA	NA	NA	<0.5	NA	NA	NA	NA	NA	NA	NA	NA	0.6	NA	NA	NA	NA	NA	NA	NA
Calcium (Total)				NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Chromium, Total	100 (A)	11	4.6E+5	NA	NA	NA	NA	NA	<5	NA	<5	<5	NA	NA	NA	NA	NA	7	NA	<5	<5	NA	NA	NA	NA	NA
Chromium (Dissolved)	100 (A)	11	4.6E+5	NA	NA	NA	NA	NA	NA	<5	NA	NA	NA	NA	NA	NA	NA	NA	<5	NA	NA	NA	NA	NA	NA	NA
Cobalt	100	100	2.4E+6	NA	NA	NA	NA	NA	<5	NA	<5	<5	NA	NA	NA	NA	NA	<5	NA	<5	<5	NA	NA	NA	NA	NA
Cobalt (Dissolved)	100	100	2.4E+6	NA	NA	NA	NA	NA	NA	<5	NA	NA	NA	NA	NA	NA	NA	NA	<5	NA	NA	NA	NA	NA	NA	NA
Copper (B)	1,000 (E)	22	7.4E+6	NA	NA	NA	NA	NA	<4	NA	5	<4	NA	NA	NA	NA	NA	4	NA	<5	<4	NA	NA	NA	NA	NA
Copper (B) (Dissolved)	1,000 (E)	22	7.4E+6	NA	NA	NA	NA	NA	NA	6	NA	NA	NA	NA	NA	NA	NA	NA	<4	NA	NA	NA	NA	NA	NA	NA
Iron (B)	5,600(E)	NA	5.8E+7	NA	NA	NA	NA	NA	840	NA	960	2,200	NA	NA	NA	NA	NA	4,920	NA	1,170	1,880	NA	NA	NA	NA	NA
Iron (B) (Dissolved)	5,600(E)	NA	5.8E+7	NA	NA	NA	NA	NA	NA	630	NA	NA	NA	NA	NA	NA	NA	NA	100	NA	NA	NA	NA	NA	NA	NA
Magnesium (Total)	1.1E+06	NA	1.0E+9 (D)	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Manganese (B)	2,500 (E)	5,000	9.1E+6	NA	NA	NA	NA	NA	325	NA	5	260	NA	NA	NA	NA	NA	308	NA	462	1,090	NA	NA	NA	NA	NA
Manganese (B) (Dissolved)	2,500 (E)	5,000	9.1E+6	NA	NA	NA	NA	NA	NA	277	NA	NA	NA	NA	NA	NA	NA	NA	316	NA	NA	NA	NA	NA	NA	NA
Mercury, Total	2.0 (A)	0.0013	56 (S)	NA	NA	NA	NA	NA	<0.2	NA	<0.2	<0.2	NA	NA	NA	NA	NA	<0.2	NA	<0.2	<0.2	NA	NA	NA	NA	NA
Mercury (Dissolved)	2.0 (A)	0.0013	56 (S)	NA	NA	NA	NA	NA	NA	<0.2	NA	NA	NA	NA	NA	NA	NA	NA	<0.2	NA	NA	NA	NA	NA	NA	NA
Vanadium	62	12	9.7E+5	NA	NA	NA	NA	NA	<4	NA	<2	<4	NA	NA	NA	NA	NA	<4	NA	<2	<4	NA	NA	NA	NA	NA
Vanadium (Dissolved)	62	12	9.7E+5	NA	NA	NA	NA	NA	NA	<4	NA	NA	NA	NA	NA	NA	NA	NA	<4	NA	NA	NA	NA	NA	NA	NA
Zinc (B)	5,000 (E)	290	1.1E+8	NA	NA	NA	NA	NA	<5	NA	<5	<5	NA	NA	NA	NA	NA	11	NA	360	<5	NA	NA	<5	6	7
Zinc (B) (Dissolved)	5,000 (E)	290	1.1E+8	NA	NA	NA	NA	NA	NA	5	NA	NA	NA	NA	NA	NA	NA	NA	21	NA	NA	NA	NA	<5	<5	<2
Hardness				NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

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Davison Road Industrial Land
Burton, MI

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				8/10/12	11/8/12	4/18/13	7/23/13	9/24/14	4/15/15 *	8/5/15	11/18/15	2/23/16	8/12/12	11/6/12	4/22/13	7/22/13	9/25/14	4/14/15	8/5/15	11/16/15	2/29/16	8/12/12	11/6/12	4/17/13	7/22/13	9/25/14	4/14/15	8/5/15	11/16/15	2/29/16
Aluminum (B)	4,100	NA	6.4E+7	NS-CNL	NS-CNL	NS-CNL	NS-CNL	NA	NA	NA	NA	NA	NS-I H2O	92	251	65	NA	NS	NS	NS	NS	NS-I H2O	437	178	14	NS-I H2O	NS	NS	NS	NS
Aluminum (B) (Dissolved)	4,100	NA	6.4E+7	NS-CNL	NS-CNL	NS-CNL	NS-CNL	NA	NA	NA	NA	NA	NS-I H2O	NA	NA	NA	NA	NS	NS	NS	NS	NS-I H2O	NA	NA	NA	NS-I H2O	NS	NS	NS	NS
Arsenic (Total)	10 (A)	10	4,300	NS-CNL	NS-CNL	NS-CNL	NS-CNL	8	427	9	12	7	NS-I H2O	3	2	6	5	NS	NS	NS	NS	NS-I H2O	3	<2	6	NS-I H2O	NS	NS	NS	NS
Arsenic (Dissolved)	10 (A)	10	4,300	NS-CNL	NS-CNL	NS-CNL	NS-CNL	NA	NA	7	12	7	NS-I H2O	NA	NA	NA	NA	NS	NS	NS	NS	NS-I H2O	NA	NA	NA	NS-I H2O	NS	NS	NS	NS
Cadmium (B)	5.0 (A)	4.9	1.9E+5	NS-CNL	NS-CNL	NS-CNL	NS-CNL	NA	NA	NA	NA	NA	NS-I H2O	<0.5	<0.5	<0.5	NA	NS	NS	NS	NS	NS-I H2O	<0.5	<0.5	<0.5	NS-I H2O	NS	NS	NS	NS
Cadmium (B) (Dissolved)	5.0 (A)	4.9	1.9E+5	NS-CNL	NS-CNL	NS-CNL	NS-CNL	NA	NA	NA	NA	NA	NS-I H2O	NA	NA	NA	NA	NS	NS	NS	NS	NS-I H2O	NA	NA	NA	NS-I H2O	NS	NS	NS	NS
Calcium (Total)				NS-CNL	NS-CNL	NS-CNL	NS-CNL	NA	NA	NA	NA	NA	NS-I H2O	NA	NA	NA	NA	NS	NS	NS	NS	NS-I H2O	NA	NA	NA	NS-I H2O	NS	NS	NS	NS
Chromium, Total	100 (A)	11	4.6E+5	NS-CNL	NS-CNL	NS-CNL	NS-CNL	NA	NA	NA	NA	NA	NS-I H2O	<5	<5	<5	NA	NS	NS	NS	NS	NS-I H2O	<5	<5	<5	NS-I H2O	NS	NS	NS	NS
Chromium (Dissolved)	100 (A)	11	4.6E+5	NS-CNL	NS-CNL	NS-CNL	NS-CNL	NA	NA	NA	NA	NA	NS-I H2O	NA	NA	NA	NA	NS	NS	NS	NS	NS-I H2O	NA	NA	NA	NS-I H2O	NS	NS	NS	NS
Cobalt	100	100	2.4E+6	NS-CNL	NS-CNL	NS-CNL	NS-CNL	NA	NA	NA	NA	NA	NS-I H2O	<5	<5	<5	NA	NS	NS	NS	NS	NS-I H2O	<5	<5	<5	NS-I H2O	NS	NS	NS	NS
Cobalt (Dissolved)	100	100	2.4E+6	NS-CNL	NS-CNL	NS-CNL	NS-CNL	NA	NA	NA	NA	NA	NS-I H2O	NA	NA	NA	NA	NS	NS	NS	NS	NS-I H2O	NA	NA	NA	NS-I H2O	NS	NS	NS	NS
Copper (B)	1,000 (E)	22	7.4E+6	NS-CNL	NS-CNL	NS-CNL	NS-CNL	NA	NA	NA	NA	NA	NS-I H2O	<4	<5	<4	NA	NS	NS	NS	NS	NS-I H2O	<4	<5	<4	NS-I H2O	NS	NS	NS	NS
Copper (B) (Dissolved)	1,000 (E)	22	7.4E+6	NS-CNL	NS-CNL	NS-CNL	NS-CNL	NA	NA	NA	NA	NA	NS-I H2O	NA	NA	NA	NA	NS	NS	NS	NS	NS-I H2O	NA	NA	NA	NS-I H2O	NS	NS	NS	NS
Iron (B)	5,600(E)	NA	5.8E+7	NS-CNL	NS-CNL	NS-CNL	NS-CNL	NA	NA	NA	NA	NA	NS-I H2O	780	780	400	NA	NS	NS	NS	NS	NS-I H2O	1,520	800	290	NS-I H2O	NS	NS	NS	NS
Iron (B) (Dissolved)	5,600(E)	NA	5.8E+7	NS-CNL	NS-CNL	NS-CNL	NS-CNL	NA	NA	NA	NA	NA	NS-I H2O	NA	NA	NA	NA	NS	NS	NS	NS	NS-I H2O	NA	NA	NA	NS-I H2O	NS	NS	NS	NS
Magnesium (Total)	1.1E+06	NA	1.0E+9 (D)	NS-CNL	NS-CNL	NS-CNL	NS-CNL	NA	NA	NA	NA	NA	NS-I H2O	NA	NA	NA	NA	NS	NS	NS	NS	NS-I H2O	NA	NA	NA	NS-I H2O	NS	NS	NS	NS
Manganese (B)	2,500 (E)	5,000	9.1E+6	NS-CNL	NS-CNL	NS-CNL	NS-CNL	NA	NA	NA	NA	NA	NS-I H2O	95	52	57	NA	NS	NS	NS	NS	NS-I H2O	125	50	38	NS-I H2O	NS	NS	NS	NS
Manganese (B) (Dissolved)	2,500 (E)	5,000	9.1E+6	NS-CNL	NS-CNL	NS-CNL	NS-CNL	NA	NA	NA	NA	NA	NS-I H2O	NA	NA	NA	NA	NS	NS	NS	NS	NS-I H2O	NA	NA	NA	NS-I H2O	NS	NS	NS	NS
Mercury, Total	2.0 (A)	0.0013	56 (S)	NS-CNL	NS-CNL	NS-CNL	NS-CNL	NA	NA	NA	NA	NA	NS-I H2O	<0.2	<0.2	<0.2	NA	NS	NS	NS	NS	NS-I H2O	<0.2	<0.2	<0.2	NS-I H2O	NS	NS	NS	NS
Mercury (Dissolved)	2.0 (A)	0.0013	56 (S)	NS-CNL	NS-CNL	NS-CNL	NS-CNL	NA	NA	NA	NA	NA	NS-I H2O	NA	NA	NA	NA	NS	NS	NS	NS	NS-I H2O	NA	NA	NA	NS-I H2O	NS	NS	NS	NS
Vanadium	62	12	9.7E+5	NS-CNL	NS-CNL	NS-CNL	NS-CNL	NA	NA	NA	NA	NA	NS-I H2O	<4	<2	<4	NA	NS	NS	NS	NS	NS-I H2O	<4	<2	<4	NS-I H2O	NS	NS	NS	NS
Vanadium (Dissolved)	62	12	9.7E+5	NS-CNL	NS-CNL	NS-CNL	NS-CNL	NA	NA	NA	NA	NA	NS-I H2O	NA	NA	NA	NA	NS	NS	NS	NS	NS-I H2O	NA	NA	NA	NS-I H2O	NS	NS	NS	NS
Zinc (B)	5,000 (E)	290	1.1E+8	NS-CNL	NS-CNL	NS-CNL	NS-CNL	NA	NA	NA	NA	NA	NS-I H2O	7	8	<5	NA	NS	NS	NS	NS	NS-I H2O	16	8	<5	NS-I H2O	NS	NS	NS	NS
Zinc (B) (Dissolved)	5,000 (E)	290	1.1E+8	NS-CNL	NS-CNL	NS-CNL	NS-CNL	NA	NA	NA	NA	NA	NS-I H2O	NA	NA	NA	NA	NS	NS	NS	NS	NS-I H2O	NA	NA	NA	NS-I H2O	NS	NS	NS	NS
Hardness				NS-CNL	NS-CNL	NS-CNL	NS-CNL	NA	NA	NA	NA	NA	NS-I H2O	NA	NA	NA	372,000	NS	NS	NS	NS	NS-I H2O	NA	NA	NA	NS-I H2O	NS	NS	NS	NS

NOTES:
VOC-All concentrations below laboratory detection limit
SVOC/PNAs-All concentrations below laboratory detection limit

Results in parts per billion (ppb)/micrograms per liter (ug/l)

Concentrations compared to the MDEQ Part 201 Non-Residential Cleanup Criteria

Bold-exceeds the MDEQ Part 201 Non-Residential Drinking Water Criteria
Shaded-Exceeds Non-Residential GSI Criteria
Shaded-MDEQ criteria for Total Arsenic

* Samples collected during the April 2015 sampling event were not collected using low flow sampling methodology. Low flow sampling methodology was used during all other sampling events.

Samples collected during the August 2015 sampling event were additionally analyzed for dissolved arsenic and /or zinc. Refer to the laboratory analytical report for results.

NS-Not Sampled
NA-Not Analyzed or Not Applicable
NS I H2O-Not Sampled Due to Insufficient Amount of Water
NS-CNL-Not Sampled Could Not Locate Well.

GSI Criteria was calculated pursuant to the "Calculation of Generic Facility-Specific Part 201 GSI Criteria for (G) Hazardous Substances"

Facility Specific constituents include: Cadmium, Copper, Manganese and Zinc.

290 mg/CaCO3/L was used to calculate Facility Specific GSI

Table 2
Groundwater Analytical Results
Davison Road Industrial Land
Burton, MI

Metals ug/L	Non-Residential Drinking Water Criteria and RBSLs	Non-Residential Groundwater Surface Water Interface Protection Criteria and RBSLs	Non-Residential Groundwater Contact Criteria and RBSLs	GC-3 (Downstream)									D-3 East								D-2 Mid								
				8/12/12	11/6/12	4/17/13	7/22/13	9/23/14	4/14/15	8/5/15	11/16/15	2/29/16	11/8/12	4/22/13	7/22/13	9/24/14	4/14/15	8/5/15	11/16/15	2/29/16	8/10/12	11/8/12	4/22/13	7/22/13	9/24/14	4/14/15	8/5/15	11/16/15	2/29/16
Aluminum (B)	4,100	NA	6.4E+7	NS-I H2O	67	312	19	NA	NS	NS	NS	NS	NS-I H2O	82	24	NS-I H2O	NS	NS	NS	NS	NS-I H2O	NS-I H2O	64	NS-I H2O	NS-I H2O	NS	NS	NS	NS
Aluminum (B) (Dissolved)	4,100	NA	6.4E+7	NS-I H2O	NA	NA	NA	NA	NS	NS	NS	NS	NS-I H2O	NA	NA	NS-I H2O	NS	NS	NS	NS	NS-I H2O	NS-I H2O	NA	NS-I H2O	NS-I H2O	NS	NS	NS	NS
Arsenic (Total)	10 (A)	10	4,300	NS-I H2O	2	3	7	4	NS	NS	NS	NS	NS-I H2O	<2	18	NS-I H2O	NS	NS	NS	NS	NS-I H2O	NS-I H2O	<2	NS-I H2O	NS-I H2O	NS	NS	NS	NS
Arsenic (Dissolved)	10 (A)	10	4,300	NS-I H2O	NA	NA	NA	NA	NS	NS	NS	NS	NS-I H2O	NA	NA	NS-I H2O	NS	NS	NS	NS	NS-I H2O	NS-I H2O	NA	NS-I H2O	NS-I H2O	NS	NS	NS	NS
Cadmium (B)	5.0 (A)	4.9	1.9E+5	NS-I H2O	<0.5	<0.5	<0.5	NA	NS	NS	NS	NS	NS-I H2O	<0.5	<0.5	NS-I H2O	NS	NS	NS	NS	NS-I H2O	NS-I H2O	<0.5	NS-I H2O	NS-I H2O	NS	NS	NS	NS
Cadmium (B) (Dissolved)	5.0 (A)	4.9	1.9E+5	NS-I H2O	NA	NA	NA	NA	NS	NS	NS	NS	NS-I H2O	NA	NA	NS-I H2O	NS	NS	NS	NS	NS-I H2O	NS-I H2O	NA	NS-I H2O	NS-I H2O	NS	NS	NS	NS
Calcium (Total)				NS-I H2O	NA	NA	NA	NA	NS	NS	NS	NS	NS-I H2O	NA	NA	NS-I H2O	NS	NS	NS	NS	NS-I H2O	NS-I H2O	NA	NS-I H2O	NS-I H2O	NS	NS	NS	NS
Chromium, Total	100 (A)	11	4.6E+5	NS-I H2O	<5	<5	<5	NA	NS	NS	NS	NS	NS-I H2O	<5	<5	NS-I H2O	NS	NS	NS	NS	NS-I H2O	NS-I H2O	<5	NS-I H2O	NS-I H2O	NS	NS	NS	NS
Chromium (Dissolved)	100 (A)	11	4.6E+5	NS-I H2O	NA	NA	NA	NA	NS	NS	NS	NS	NS-I H2O	NA	NA	NS-I H2O	NS	NS	NS	NS	NS-I H2O	NS-I H2O	NA	NS-I H2O	NS-I H2O	NS	NS	NS	NS
Cobalt	100	100	2.4E+6	NS-I H2O	<5	<5	<5	NA	NS	NS	NS	NS	NS-I H2O	<5	<5	NS-I H2O	NS	NS	NS	NS	NS-I H2O	NS-I H2O	<5	NS-I H2O	NS-I H2O	NS	NS	NS	NS
Cobalt (Dissolved)	100	100	2.4E+6	NS-I H2O	NA	NA	NA	NA	NS	NS	NS	NS	NS-I H2O	NA	NA	NS-I H2O	NS	NS	NS	NS	NS-I H2O	NS-I H2O	NA	NS-I H2O	NS-I H2O	NS	NS	NS	NS
Copper (B)	1,000 (E)	22	7.4E+6	NS-I H2O	<4	<5	<4	NA	NS	NS	NS	NS	NS-I H2O	<5	<4	NS-I H2O	NS	NS	NS	NS	NS-I H2O	NS-I H2O	<5	NS-I H2O	NS-I H2O	NS	NS	NS	NS
Copper (B) (Dissolved)	1,000 (E)	22	7.4E+6	NS-I H2O	NA	NA	NA	NA	NS	NS	NS	NS	NS-I H2O	NA	NA	NS-I H2O	NS	NS	NS	NS	NS-I H2O	NS-I H2O	NA	NS-I H2O	NS-I H2O	NS	NS	NS	NS
Iron (B)	5,600(E)	NA	5.8E+7	NS-I H2O	650	1,230	280	NA	NS	NS	NS	NS	NS-I H2O	350	19,000	NS-I H2O	NS	NS	NS	NS	NS-I H2O	NS-I H2O	350	NS-I H2O	NS-I H2O	NS	NS	NS	NS
Iron (B) (Dissolved)	5,600(E)	NA	5.8E+7	NS-I H2O	NA	NA	NA	NA	NS	NS	NS	NS	NS-I H2O	NA	NA	NS-I H2O	NS	NS	NS	NS	NS-I H2O	NS-I H2O	NA	NS-I H2O	NS-I H2O	NS	NS	NS	NS
Magnesium (Total)	1.1E+06	NA	1.0E+9 (D)	NS-I H2O	NA	NA	NA	NA	NS	NS	NS	NS	NS-I H2O	NA	NA	NS-I H2O	NS	NS	NS	NS	NS-I H2O	NS-I H2O	NA	NS-I H2O	NS-I H2O	NS	NS	NS	NS
Manganese (B)	2,500 (E)	5,000	9.1E+6	NS-I H2O	72	76	32	NA	NS	NS	NS	NS	NS-I H2O	30	10,400	NS-I H2O	NS	NS	NS	NS	NS-I H2O	NS-I H2O	55	NS-I H2O	NS-I H2O	NS	NS	NS	NS
Manganese (B) (Dissolved)	2,500 (E)	5,000	9.1E+6	NS-I H2O	NA	NA	NA	NA	NS	NS	NS	NS	NS-I H2O	NA	NA	NS-I H2O	NS	NS	NS	NS	NS-I H2O	NS-I H2O	NA	NS-I H2O	NS-I H2O	NS	NS	NS	NS
Mercury, Total	2.0 (A)	0.0013	56 (S)	NS-I H2O	<0.2	<0.2	<0.2	NA	NS	NS	NS	NS	NS-I H2O	<0.2	<0.2	NS-I H2O	NS	NS	NS	NS	NS-I H2O	NS-I H2O	<0.2	NS-I H2O	NS-I H2O	NS	NS	NS	NS
Mercury (Dissolved)	2.0 (A)	0.0013	56 (S)	NS-I H2O	NA	NA	NA	NA	NS	NS	NS	NS	NS-I H2O	NA	NA	NS-I H2O	NS	NS	NS	NS	NS-I H2O	NS-I H2O	NA	NS-I H2O	NS-I H2O	NS	NS	NS	NS
Vanadium	62	12	9.7E+5	NS-I H2O	<4	<2	<4	NA	NS	NS	NS	NS	NS-I H2O	<2	<4	NS-I H2O	NS	NS	NS	NS	NS-I H2O	NS-I H2O	<2	NS-I H2O	NS-I H2O	NS	NS	NS	NS
Vanadium (Dissolved)	62	12	9.7E+5	NS-I H2O	NA	NA	NA	NA	NS	NS	NS	NS	NS-I H2O	NA	NA	NS-I H2O	NS	NS	NS	NS	NS-I H2O	NS-I H2O	NA	NS-I H2O	NS-I H2O	NS	NS	NS	NS
Zinc (B)	5,000 (E)	290	1.1E+8	NS-I H2O	6	21	<5	NA	NS	NS	NS	NS	NS-I H2O	8	<5	NS-I H2O	NS	NS	NS	NS	NS-I H2O	NS-I H2O	<5	NS-I H2O	NS-I H2O	NS	NS	NS	NS
Zinc (B) (Dissolved)	5,000 (E)	290	1.1E+8	NS-I H2O	NA	NA	NA	NA	NS	NS	NS	NS	NS-I H2O	NA	NA	NS-I H2O	NS	NS	NS	NS	NS-I H2O	NS-I H2O	NA	NS-I H2O	NS-I H2O	NS	NS	NS	NS
Hardness				NS-I H2O	NA	NA	NA	290,000	NS	NS	NS	NS	NS-I H2O	NA	NA	NS-I H2O	NS	NS	NS	NS	NS-I H2O	NS-I H2O	NA	NS-I H2O	NS-I H2O	NS	NS	NS	NS

NOTES:

VOC-All concentrations below laboratory detection limit

SVOC/PNAs-All concentrations below laboratory detection limit

Results in parts per billion (ppb)/micrograms per liter (ug/l)

Concentrations compared to the MDEQ Part 201 Non-Residential Cleanup Criteria

Bold-exceeds the MDEQ Part 201 Non-Residential Drinking Water Criteria

Shaded-Exceeds Non-Residential GSI Criteria

Shaded-MDEQ criteria for Total Arsenic

* Samples collected during the April 2015 sampling event were not collected using low flow sampling methodology. Low flow sampling methodology was used during all other sampling events.

Samples collected during the August 2015 sampling event were additionally analyzed for dissolved arsenic and /or zinc. Refer to the laboratory analytical report for results.

NS-Not Sampled
NA-Not Analyzed or Not Applicable
NS I H2O-Not Sampled Due to Insufficient Amount of Water
NS-CNL-Not Sampled Could Not Locate Well.

GSI Criteria was calculated pursuant to the "Calculation of Generic Facility-Specific Part 201 GSI Criteria for (G) Hazardous Substances"

Facility Specific constituents include: Cadmium, Copper, Manganese and Zinc.

290 mg/CaCO3/L was used to calculate Facility Specific GSI

Table 2
Groundwater Analytical Results
Davison Road Industrial Land
Burton, MI

Metals ug/L	Non-Residential Drinking Water Criteria and RBSLs	Non-Residential Groundwater Surface Water Interface Protection Criteria and RBSLs	Non-Residential Groundwater Contact Criteria and RBSLs	D-1 West								
				8/10/12	11/8/12	4/22/13	7/22/13	9/24/14	4/14/15	8/15/15	11/16/15	2/29/16
Aluminum (B)	4,100	NA	6.4E+7	NS-I H20	NS-I H20	68	NS-I H20	NS-I H20	NS	NS	NS	NS
Aluminum (B) (Dissolved)	4,100	NA	6.4E+7	NS-I H20	NS-I H20	NA	NS-I H20	NS-I H20	NS	NS	NS	NS
Arsenic (Total)	10 (A)	10	4,300	NS-I H20	NS-I H20	<2	NS-I H20	NS-I H20	NS	NS	NS	NS
Arsenic (Dissolved)	10 (A)	10	4,300	NS-I H20	NS-I H20	NA	NS-I H20	NS-I H20	NS	NS	NS	NS
Cadmium (B)	5.0 (A)	4.9	1.9E+5	NS-I H20	NS-I H20	<0.5	NS-I H20	NS-I H20	NS	NS	NS	NS
Cadmium (B) (Dissolved)	5.0 (A)	4.9	1.9E+5	NS-I H20	NS-I H20	NA	NS-I H20	NS-I H20	NS	NS	NS	NS
Calcium (Total)				NS-I H20	NS-I H20	NA	NS-I H20	NS-I H20	NS	NS	NS	NS
Chromium, Total	100 (A)	11	4.6E+5	NS-I H20	NS-I H20	<5	NS-I H20	NS-I H20	NS	NS	NS	NS
Chromium (Dissolved)	100 (A)	11	4.6E+5	NS-I H20	NS-I H20	NA	NS-I H20	NS-I H20	NS	NS	NS	NS
Cobalt	100	100	2.4E+6	NS-I H20	NS-I H20	<5	NS-I H20	NS-I H20	NS	NS	NS	NS
Cobalt (Dissolved)	100	100	2.4E+6	NS-I H20	NS-I H20	NA	NS-I H20	NS-I H20	NS	NS	NS	NS
Copper (B)	1,000 (E)	22	7.4E+6	NS-I H20	NS-I H20	<5	NS-I H20	NS-I H20	NS	NS	NS	NS
Copper (B) (Dissolved)	1,000 (E)	22	7.4E+6	NS-I H20	NS-I H20	NA	NS-I H20	NS-I H20	NS	NS	NS	NS
Iron (B)	5,600(E)	NA	5.8E+7	NS-I H20	NS-I H20	410	NS-I H20	NS-I H20	NS	NS	NS	NS
Iron (B) (Dissolved)	5,600(E)	NA	5.8E+7	NS-I H20	NS-I H20	NA	NS-I H20	NS-I H20	NS	NS	NS	NS
Magnesium (Total)	1.1E+06	NA	1.0E+9 (D)	NS-I H20	NS-I H20	NA	NS-I H20	NS-I H20	NS	NS	NS	NS
Manganese (B)	2,500 (E)	5,000	9.1E+6	NS-I H20	NS-I H20	48	NS-I H20	NS-I H20	NS	NS	NS	NS
Manganese (B) (Dissolved)	2,500 (E)	5,000	9.1E+6	NS-I H20	NS-I H20	NA	NS-I H20	NS-I H20	NS	NS	NS	NS
Mercury, Total	2.0 (A)	0.0013	56 (S)	NS-I H20	NS-I H20	<0.2	NS-I H20	NS-I H20	NS	NS	NS	NS
Mercury (Dissolved)	2.0 (A)	0.0013	56 (S)	NS-I H20	NS-I H20	NA	NS-I H20	NS-I H20	NS	NS	NS	NS
Vanadium	62	12	9.7E+5	NS-I H20	NS-I H20	<2	NS-I H20	NS-I H20	NS	NS	NS	NS
Vanadium (Dissolved)	62	12	9.7E+5	NS-I H20	NS-I H20	NA	NS-I H20	NS-I H20	NS	NS	NS	NS
Zinc (B)	5,000 (E)	290	1.1E+8	NS-I H20	NS-I H20	<5	NS-I H20	NS-I H20	NS	NS	NS	NS
Zinc (B) (Dissolved)	5,000 (E)	290	1.1E+8	NS-I H20	NS-I H20	NA	NS-I H20	NS-I H20	NS	NS	NS	NS
Hardness				NS-I H20	NS-I H20	NA	NS-I H20	NS-I H20	NS	NS	NS	NS

NOTES:
VOC-All concentrations below laboratory detection limit
SVOC/PNAs-All concentrations below laboratory detection limit

Results in parts per billion (ppb)/micrograms per liter (ug/l)

Concentrations compared to the MDEQ Part 201 Non-Residential Cleanup Criteria

Bold-exceeds the MDEQ Part 201 Non-Residential Drinking Water Criteria
Shaded-Exceeds Non-Residential GSI Criteria

Shaded-MDEQ criteria for Total Arsenic

* Samples collected during the April 2015 sampling event were not collected using low flow sampling methodology. Low flow sampling methodology was used during all other sampling events.

Samples collected during the August 2015 sampling event were additionally analyzed for dissolved arsenic and /or zinc. Refer to the laboratory analytical report for results.

NS-Not Sampled
NA-Not Analyzed or Not Applicable
NS I H20-Not Sampled Due to Insufficient Amount of Water
NS-CNL-Not Sampled Could Not Locate Well.

GSI Criteria was calculated pursuant to the "Calculation of Generic Facility-Specific Part 201 GSI Criteria for (G) Hazardous Substances"

Facility Specific constituents include: Cadmium, Copper, Manganese and Zinc.

290 mg/CaCO3/L was used to calculate Facility Specific GSI

Table 3 - Direct Contact Excavation

Soil Analytical Results-PNAs
RACER Trust - Davison Road Industrial Land
Burton, MI
8/16

Sample ID	Chemical Abstract Service Number	Non-Residential Drinking Water Protection Criteria and RBSLs	Non-Residential	Non-Residential	Non-	DC-EX-BOTTOM	DC-EX-N.WALL	DC-EX-S.WALL
Sample Depth			Groundwater	Groundwater	Residential	10'	7.5'	6.5'
Sample Date			Surface Water	Contact Protection	Direct	7/21/2016	7/21/2016	7/21/2016
PNAs			Interface Protection Criteria and RBSLs	Criteria and RBSLs	Contact Criteria and RBSLs			
Acenaphthene	83-32-9	3.0E+5	8,700	9.7E+5	1.3E+8	<300	<300	<300
Acenaphthylene	208-96-8	5,900	ID	4.4E+5	5.2E+6	<300	<300	<300
Anthracene	120-12-7	41,000	ID	41,000	7.3E+8	<300	<300	<300
Benzo(a)anthracene (Q)	56-55-3	NLL	NLL	NLL	80,000	<300	<300	<300
Benzo(a)pyrene (Q)	50-32-8	NLL	NLL	NLL	8,000	<300	<300	<300
Benzo(b)fluoranthene (Q)	205-99-2	NLL	NLL	NLL	80,000	<300	<300	<300
Benzo(g,h,i)perylene	191-24-2	NLL	NLL	NLL	7.0E+6	<300	<300	<300
Benzo(k)fluoranthene (Q)	207-08-9	NLL	NLL	NLL	8.0E+5	<300	<300	<300
Chrysene (Q)	218-01-9	NLL	NLL	NLL	8.0E+6	<300	<300	<300
Dibenzo(a,h)anthracene (Q)	53-70-3	NLL	NLL	NLL	8,000	<300	<300	<300
Fluoranthene	206-44-0	7.3E+5	5,500	7.3E+5	1.3E+8	<300	600	<300
Fluorene	86-73-7	3.9E+5	5,300	8.9E+5	8.7E+7	<300	<300	<300
Indeno(1,2,3-cd)pyrene (Q)	193-39-5	NLL	NLL	NLL	80,000	<300	<300	<300
2-Methylnaphthalene	91-57-6	57,000	4,200	5.5E+6	2.6E+7	<300	<300	<300
1-Methylnaphthalene	90-12-0	NLL	NLL	NLL	NLL	<300	<300	<300
Naphthalene	91-20-3	35,000	730	2.1E+6	5.2E+7	<300	<300	<300
Phenanthrene	85-01-8	56,000	2,100	1.1E+6	5.2E+6	<300	300	<300
Pyrene	129-00-0	4.8E+5	ID	4.8E+5	8.4E+7	<300	400	<300

Analytical results compared to the MDEQ Part 201 Non-Residential Cleanup Criteria
Results in parts per billion (ppb)/micrograms per kilograms (ug/kg)

Bold-exceeds the MDEQ Part 201 Non Residential Drinking Water Criteria

Blue-Exceeds Non-Residential GSI Criteria

Italic-Exceeds Groundwater Protection Criteria

Green-Exceeds Non-Residential Direct Contact Criteria

NS - Not Sampled

NA - Not Analyzed or Not Applicable

Note: Includes analytes with concentrations above the Non Residential cleanup criteria only.

Table 3 - Direct Contact Excavation

Soil Analytical Results-PNAs
RACER Trust - Davison Road Industrial Land
Burton, MI
8/16

Sample ID	Chemical Abstract Service Number	Non-Residential Drinking Water Protection Criteria and RBSLs	Non-Residential Groundwater Surface Water Interface Protection Criteria and RBSLs	Non-Residential Groundwater Contact Protection Criteria and RBSLs	Non-Residential Direct Contact Criteria and RBSLs	DC-EX-E.WALL	DC-EX-E.WALL #2	DC-EX-W.WALL	DC-OVERBURDEN- COMPOSITE
Sample Depth						6.5'	6.5'	7'	--
Sample Date						7/21/2016	7/28/2016	7/21/2016	7/21/2016
PNAs									
Acenaphthene	83-32-9	3.0E+5	8,700	9.7E+5	1.3E+8	1,900	<300	<300	<300
Acenaphthylene	208-96-8	5,900	ID	4.4E+5	5.2E+6	<300	<300	<300	<300
Anthracene	120-12-7	41,000	ID	41,000	7.3E+8	3,200	<300	<300	<300
Benzo(a)anthracene (Q)	56-55-3	NLL	NLL	NLL	80,000	9,500	<300	<300	<300
Benzo(a)pyrene (Q)	50-32-8	NLL	NLL	NLL	8,000	9,100	<300	<300	<300
Benzo(b)fluoranthene (Q)	205-99-2	NLL	NLL	NLL	80,000	8,800	<300	<300	<300
Benzo(g,h,i)perylene	191-24-2	NLL	NLL	NLL	7.0E+6	4,100	<300	<300	<300
Benzo(k)fluoranthene (Q)	207-08-9	NLL	NLL	NLL	8.0E+5	8,500	<300	<300	<300
Chrysene (Q)	218-01-9	NLL	NLL	NLL	8.0E+6	8,700	<300	<300	<300
Dibenzo(a,h)anthracene (Q)	53-70-3	NLL	NLL	NLL	8,000	<300	<300	<300	<300
Fluoranthene	206-44-0	7.3E+5	5,500	7.3E+5	1.3E+8	23,500	<300	<300	400
Fluorene	86-73-7	3.9E+5	5,300	8.9E+5	8.7E+7	1,400	<300	<300	<300
Indeno(1,2,3-cd)pyrene (Q)	193-39-5	NLL	NLL	NLL	80,000	<300	<300	<300	<300
2-Methylnaphthalene	91-57-6	57,000	4,200	5.5E+6	2.6E+7	<300	<300	<300	<300
1-Methylnaphthalene	90-12-0	NLL	NLL	NLL	NLL	<300	<300	<300	<300
Naphthalene	91-20-3	35,000	730	2.1E+6	5.2E+7	800	<300	<300	<300
Phenanthrene	85-01-8	56,000	2,100	1.1E+6	5.2E+6	13,100	<300	<300	<300
Pyrene	129-00-0	4.8E+5	ID	4.8E+5	8.4E+7	17,900	<300	<300	300

Analytical results compared to the MDEQ Part 201 Non-Residential Cleanup Criteria
Results in parts per billion (ppb)/micrograms per kilograms (ug/kg)

Bold-exceeds the MDEQ Part 201 Non Residential Drinking Water Criteria

Blue-Exceeds Non-Residential GSI Criteria

Italic-Exceeds Groundwater Protection Criteria

Green-Exceeds Non-Residential Direct Contact Criteria

NS - Not Sampled

NA - Not Analyzed or Not Applicable

Note: Includes analytes with concentrations above the Non Residential cleanup criteria only.

ATTACHMENT C

DECLARATION OF RESTRICTIVE COVENANT



**AMENDED AND RESTATED
DECLARATION OF RESTRICTIVE COVENANT**

MDEQ Reference No: RC-OWMRP-111-17-002

This Amended and Restated Declaration of Restrictive Covenant (Amended Restrictive Covenant) has been recorded with the Genesee County Register of Deeds to protect public health, safety, welfare and the environment pursuant to the provisions of Part 111, Hazardous Waste Management, Michigan Compiled Laws (MCL) 324.11101, *et seq.* (Part 111) and the applicable Sections of Part 201, Environmental Remediation, Michigan Compiled Laws (MCL) 324.20101, *et seq.* (Part 201) of the Natural Resources and Environmental Protection Act (NREPA), 1994 PA 451, as amended, MCL 324.101, *et seq.* and the Solid Waste Disposal Act, commonly referred to as the Resource Conservation and Recovery Act of 1976, as amended by the Hazardous and Solid Waste Amendments of 1984, 42 U.S.C. §§ 6901, *et seq.* (RCRA).

This Amended Restrictive Covenant is made by RACER Properties LLC, the address of which is 500 Woodward Avenue, Suite 2650, Detroit, MI 48226, the Grantor and an entity wholly owned by the Revitalizing Auto Communities Environmental Response Trust (Trust), and the current fee title holder of the property, for the benefit of the Grantee, State of Michigan, Department of Environment Quality (MDEQ), the address of which is 525 West Allegan Street, P.O. Box 30473, Lansing, MI 48909-7973.

The recording of this Amended Restrictive Covenant amends and restates in its entirety the Declaration of Restrictive Covenant dated as of September 27, 2013, and recorded with the Genesee County Register of Deeds on September 30, 2013 as Instrument Number 201309300105450 (2013 Restrictive Covenant). To the extent this Amended Restrictive Covenant conflicts with the 2013 Restrictive Covenant, the terms of this Amended Restrictive Covenant shall govern and control.

This Amended Restrictive Covenant has been made to prohibit or restrict activities that could result in unacceptable exposure to environmental contamination present at the property commonly known as Davison Road Industrial Land located in Burton, Genesee County, Michigan, Site ID#25000447, Tax Identification Numbers 59-10-100-30 (0.575 acres) and 59-10-100-031 (55.63 acres), and legally described and illustrated in Exhibit 1 (Property or Site), and to assure that the use of the Property is consistent with the exposure assumptions used to develop the nonresidential clean-up criteria under Section 20120a(1)(b) of NREPA and the exposure control measures relied upon at the Property.

NCS-844906 PAC FATCO

The MDEQ's approval of this Amended and Restated Declaration of Restrictive Covenant is documented by the letter attached as Exhibit 2.

Recording of this Amended Restrictive Covenant with the Genesee County Register of Deeds is designed to: (1) restrict land uses at the Property; (2) restrict exposures to groundwater on the Property; (3) require any future work or other activities on the Property by or for the Owner to be conducted in conformance with; i) applicable Michigan Department of Environmental Quality (MDEQ) soil relocation requirements including but not limited to MCL 324.20120c and any related administrative rules and MDEQ guidance, and ii) applicable due care obligations under MCL 324.20107a and associated administrative rules and guidance, and the Hazardous Waste Operations and Emergency Response Standard (HAZWOPER), 29 Code of Federal Regulations (CFR) Part 1910; and (4) prohibit structures from being constructed on the Property, unless the Owner has considered the potential for vapor intrusion, if any, and has taken steps to address such potential, if necessary, as may be required by MDEQ.

The land or resource use restrictions contained in this Amended Restrictive Covenant are based upon information available at the time this document was recorded. Future changes in the environmental condition of the Property or changes in the cleanup criteria developed under Parts 111 and 201; the discovery of environmental conditions at the Property that were not known at the time this document was recorded; or use of the Property in a manner inconsistent with the restrictions described herein, may result in this Amended Restrictive Covenant not being protective of public health, safety, and welfare, and the environment. Additional restrictions may become necessary.

MDEQ recommends that prospective purchasers or users of the Property undertake appropriate due diligence prior to acquiring or using this Property, and undertake appropriate actions to comply with the due care requirements of Section 20107a of the NREPA.

Definitions

"MDEQ" means the Michigan Department of Environmental Quality, its successor entities, and those persons or entities acting on its behalf.

"Owner" means at any given time the then current fee title holder(s) of the Property or any portion thereof, including the fee title holder's lessees and those persons or entities authorized to act on its behalf. The title to the Property is currently held by RACER Properties LLC, an entity wholly owned by the Trust (RACER Properties and the Trust are collectively referred to herein as "RACER").

"RACER" means the Revitalizing Auto Communities Environmental Response Trust (or Trust), which on March 31, 2011 was established and assumed the rights, title, and interest of Motors Liquidation Company in and to the Property pursuant to an Environmental Response Trust Consent Decree and Settlement Agreement (Settlement Agreement) entered by the U.S. Bankruptcy Court for the Southern District of New York on March 29, 2011, in the case of *In re Motors Liquidation Company*, et al., Debtors, Case No. 09-50026 (REG), among the Debtors, the United States of America, certain states including the State of Michigan, the Saint Regis Mohawk

Tribe, and EPLET, LLC, (not individually but solely in its representative capacity as Administrative Trustee of the Trust) and RACER Properties LLC.

All other terms used in this document which are defined in Part 3 Definitions, Part 111 and Part 201 of NREPA, or the Part 111 or Part 201 Rules under the Michigan Administrative Code (MAC), shall have the same meaning in this document as in those statutes and rules as on the date this Amended Restrictive Covenant is made.

Summary of Response Activities

The Property was formerly part of a larger facility with the United States Environmental Protection Agency (USEPA) site identification number MID 980568745 and is subject to the Corrective Action requirements of RCRA and Part 111.

Investigations of the Property were completed by the former General Motors Corporation (GMC) from 1996 through November 2007. The investigations included soil and groundwater characterization, fill delineation, and ecological habitat assessment. RACER completed additional Site Investigations from 2012 through the present.

Analysis of soil and groundwater samples collected from the Site identified select polynuclear aromatic hydrocarbons (PNAs), metals, and/or volatile organic compounds. Soils were found to contain concentrations which exceeded the MDEQ Generic Nonresidential Drinking Water Protection, Groundwater/Surface Water Interface (GSI) Protection, and the Direct Contact Criteria. Groundwater was found to contain concentrations of select metals above the Non-Residential Drinking Water and GSI Cleanup Criteria. Exhibit 3 lists the hazardous substances detected above the MDEQ Part 201 Generic Nonresidential Criteria in soil and groundwater.

The northeastern portion of the Site contained concentrations of PNAs above the Nonresidential Direct Contact Criteria. In July 2016, excavation activities were conducted at the Site to remove soils with concentrations of PNAs that exceeded the Nonresidential Direct Contact Cleanup Criteria. The excavation activities removed approximately 37 tons of soil that contained concentrations of PNAs above the Nonresidential Direct Contact Cleanup Criteria. Excavation confirmation samples verified that soils exceeding the Nonresidential Direct Contact Cleanup Criteria were removed.

At the time this Amended Restrictive Covenant was recorded, RACER continues to perform activities in keeping with its goal to obtain from MDEQ formal No Further Action and RCRA "Corrective Action Complete with Controls" determinations for the Property.

Copies of all documents related to this matter are located in the MDEQ Remediation and Redevelopment Division, Lansing District Office and the Waste Management and Radiological Protection Division, both located in Lansing, Michigan.

NOW THEREFORE,Declaration of Land Use or Resource Use Restrictions

RACER hereby declares and covenants that the Property shall be subject to the following restrictions and conditions and intends that said restrictions and covenants shall run with the land, and may be enforced in perpetuity against the Owner by the following entities: (1) MDEQ; and (2) RACER or its successor.

1. Land Use Prohibitions. The Owner shall refrain from or otherwise prohibit all uses of the Property that are not compatible with nonresidential land use category under MCL 324.20120a(1)(b) and generally described in the Description of Allowable Uses, attached hereto as Exhibit 4.

Part 201 cleanup criteria for land use based response activities are located in the Government Documents Section of the State of Michigan Library, MCL 324.201201, *et seq.* effective December 27, 2012. These environmental protection standards which are necessary for cleanup and protection of soil, groundwater, surface water, sediments and ambient air can be used as long as the cleanup criteria are not less stringent than allowed pursuant to RCRA.

2. Activities Prohibited. The Owner shall refrain from or otherwise prohibit activities on the Property that may result in exposures above the nonresidential land use category. These prohibited activities include:
 - a. Installation or use of drinking water or irrigation wells on the Property.
 - b. Installation or use of groundwater extraction wells on the Property except for wells and devices that are part of an MDEQ-approved response activity and for short-term dewatering for construction purposes, provided the dewatering, including management and disposal of the groundwater, is conducted in accordance with all applicable environmental laws and does not cause or result in a new release, exacerbation of any pre-existing environmental condition, or any other violation of environmental laws.
 - c. Disturbance, damage, modification, or removal any monitoring wells (if present) on the Property without the prior written approval of MDEQ and RACER. Monitoring wells present at the Property as of the date of this Amended Restrictive Covenant are identified in Exhibit 5.
 - d. Relocation of contaminated soils on the Property except as provided for under Part 201, Section 20120c, MCL 324.20120c.
 - e. "Treatment", "storage", "disposal", or "release" of any Hazardous Substances, on, at, or below the Property, in a manner that would require a permit under RCRA, or

equivalent State law, except pursuant to a plan or permit approved in writing by MDEQ.

- f. Building or occupying any structure without first completing one of the following: Option 1) evaluate and determine, in accordance with applicable environmental laws, rules or regulations and to the satisfaction of MDEQ that no unacceptable vapor intrusion risks to human health exist in any existing or newly constructed site buildings; or Option 2) with the concurrence from MDEQ install, operate, and maintain a vapor barrier and/or mitigation system designed to eliminate the potential for subsurface vapor phase hazardous substances to migrate into any building at concentrations greater than applicable criteria. This prohibition does not apply to short-term (sixty (60) days or less), occupancy of a building for purposes of construction, renovation, repair, or other short-term activities as long as adequate health and safety precautions are employed during these activities, and they are performed in compliance with Section 20107a of NREPA.

If Option 2 above is selected, the Owner shall install and thereafter maintain a vapor barrier and/or install and thereafter operate and maintain a vapor intrusion mitigation system in accordance with applicable standards and criteria at the time, for the purpose of mitigating the potential intrusion of soil vapor below any human-occupied building constructed on the property after the date of this Amended Restrictive Covenant, until it is determined by MDEQ that a vapor barrier or mitigation system is no longer necessary in accordance with Option 1, above.

3. Contaminated Soil Management. The Owner shall manage contaminated soils, media and/or debris (if any) and all other soils located at the Property whether encountered on the surface or during below grade work in accordance with any applicable requirements of Part 111, Subtitle C of RCRA, the administrative rules promulgated pursuant to Part 111 and RCRA, and all other relevant State and Federal laws, including but not limited to MCL 324.20120c.
4. Access. The Owner shall grant MDEQ and RACER the right to enter the Property at reasonable times (1) to conduct and complete any and all response activities, together with any reasonably needed ingress and egress to the Property, and (2) for the purpose of determining and monitoring compliance with this Amended Restrictive Covenant, including the right to take samples and, inspect any records relating thereto, and to perform any actions necessary to maintain compliance with Part 111 and Part 201.
5. Notices. Any notice, demand, request, consent, approval, or communication that is required to be made or obtained under this Amended Restrictive Covenant shall be made in writing and shall: include a statement that the notice is being made pursuant to the requirements of this Amended Restrictive Covenant; include the MDEQ Reference Number: RC-OWMRP-111-17-002; and be served either personally, or sent via first class mail, postage prepaid, as follows:

For MDEQ:

Remediation and Redevelopment Division Director
Michigan Department of Environmental Quality
P.O. Box 30426
Lansing, MI 48909-7926

And

Waste Management and Radiological Protection Division Director
Michigan Department of Environmental Quality
P.O. Box 30473
Lansing, MI 48909-7973

For RACER:

RACER Trust
Attn: Michigan Cleanup Manager
500 Woodward Avenue, Suite 2650
Detroit, MI 48226

6. Conveyance of Property Interest. The Owner shall provide notice to MDEQ and RACER at the addresses in Paragraph 5 of the Owner's intent to transfer any interest in the Property at least fourteen (14) days prior to consummating the conveyance. A conveyance of title, easement, or other interest in the Property shall not be consummated by the Owner without adequate and complete provision for compliance with the terms and conditions of this Amended Restrictive Covenant and the applicable provisions of MCL 324.20116. Owner shall include in any instrument conveying any interest in any portion of the Property, including, but not limited to, deeds, leases, and mortgages, a notice which is in substantially the following form:

NOTICE: THE INTEREST CONVEYED HEREBY IS SUBJECT TO A DECLARATION OF RESTRICTIVE COVENANT DATED _____ [month, day, year], AND RECORDED WITH THE GENESEE COUNTY REGISTER OF DEEDS, LIBER _____, PAGE _____.

A copy of this Amended Restrictive Covenant shall be provided to all future owners, heirs, successors, lessees, easement holders, assigns, and transferees by the person transferring the interest.

7. Term. This Amended Restrictive Covenant shall run with the Property and shall be binding on the Owner, and all current and future successors, lessees, easement holders, their assigns, and their authorized agents, employees, or persons acting under their direction and control. This Amended Restrictive Covenant may only be modified or rescinded with the written approval of MDEQ and RACER.

8. Modification/ Release/Rescission. Owner may request in writing to MDEQ and RACER, at the addresses provided in Paragraph 5, modifications to, or release or rescission of, this Amended Restrictive Covenant. This Amended Restrictive Covenant may be modified, released or rescinded only with the written approval of MDEQ and RACER. Any approved modification to, or release or rescission of, this Amended Restrictive Covenant shall be filed with the Genesee County Registrar of Deeds by the Owner and a certified copy of such modification or release shall be returned to MDEQ and RACER at the addresses provided in Paragraph 5.
9. Enforcement. RACER is entitled to enforce the restrictions and covenants in this Amended Restrictive Covenant by specific performance or other legal action in a court of competent jurisdiction against the current and subsequent Owners of all or part of the Property. MDEQ is entitled to enforce the restrictions and covenants in this Amended Restrictive Covenant by specific performance or other legal action in a court of competent jurisdiction. All remedies available hereunder shall be in addition to any and all other remedies at law or equity.
10. Severability. If any provision of this Amended Restrictive Covenant is held to be invalid by a court of competent jurisdiction, the invalidity of such provision shall not affect the validity of any other provisions of this Amended Restrictive Covenant and all other provisions shall continue to remain in full force and effect.
11. Limitation on RACER's Liability. The liability of RACER and the Administrative Trustee under this Amended Restrictive Covenant is limited by the terms and conditions of the Settlement Agreement, which are incorporated herein by reference.
12. Compliance with this Amended Restrictive Covenant and Applicable Due Care Obligations. The Owner shall at all times comply with the conditions and restrictions of this Amended Restrictive Covenant and the applicable Due Care obligations under Section 107a of NREPA, MCL 324.20107a, under the applicable Michigan administrative rules R299.51003, and under the Comprehensive Environmental Response, Compensation, and Liability Act, 42 U.S.C. §§ 9601, *et seq.* Owner agrees to maintain records of its activities to comply with this Amended Restrictive Covenant and applicable Due Care obligations, and shall timely supply copies of any records documenting such compliance upon request from MDEQ or RACER.
13. Authority to Execute Amended Restrictive Covenant. The undersigned person executing this Amended Restrictive Covenant represents and certifies that he is duly authorized and has been empowered to execute and deliver this Amended Restrictive Covenant.
14. Miscellaneous.
 - a) Controlling Law. The interpretation and performance of this Amended Restrictive Covenant shall be governed by the laws of the United States as to the obligations referred to in the Settlement Agreement and by the laws and regulations of the State of Michigan for all other purposes hereunder (without reference to choice of

laws principles thereof). The right to enforce the conditions and restrictions in this Amended Restrictive Covenant are in addition to other rights and remedies that may be available, including, but not limited to, administrative and judicial remedies under CERCLA or Part 201 of NREPA.

- b) Liberal Construction. Any general rule of construction to the contrary notwithstanding, this Amended Restrictive Covenant shall be liberally construed to affect the purpose of this Amended Restrictive Covenant, and the policy and purpose of NREPA, RCRA and the land use restrictions and prospective use limitations required by Parts 111 and 201. If any provision of this Amended Restrictive Covenant is found to be ambiguous, an interpretation consistent with the purpose of this Amended Restrictive Covenant that would render the provision valid shall be favored over any interpretation that would render it invalid.
- c) Entire Agreement. This Amended Restrictive Covenant and its attachments and appendices supersedes all prior discussions, negotiations, understandings, or agreements relating specifically to this Amended Restrictive Covenant, all of which are merged herein.

[signature page follows]

IN WITNESS WHEREOF, RACER Properties LLC has caused this Amended Restrictive Covenant, RC-OWMRP-111-17-002, to be executed on this 5th day of April, 2017.

RACER PROPERTIES LLC

By: Revitalizing Auto Communities Environmental Response Trust, Sole Member of RACER Properties LLC

By: EPLET, LLC, acting solely in its capacity as Administrative Trustee of Revitalizing Auto Communities Environmental Response Trust

By: [Signature]
ELLIOTT P. LAWS, not individually, but acting solely in his capacity as Managing Member of EPLET, LLC

DISTRICT/STATE OF Columbia)
) ss.
CITY/COUNTY OF _____)

The foregoing instrument was acknowledged before me this 5th day of April, 2017, by ELLIOTT P. LAWS, not individually, but acting solely in his capacity as Managing Member of EPLET, LLC, a Delaware limited liability company, acting solely in its capacity as Administrative Trustee of Revitalizing Auto Communities Environmental Response Trust, a trust formed under the laws of the State of New York, as Sole Member of RACER Properties LLC, a Delaware limited liability company, on behalf of said limited liability company and said trust.



[Signature]
Notary Public Signature

Name of Notary Public SHARON M. DAVIS
Notary Public, District/State of Columbia
City/County of _____
My Commission Expires: 9/30/19
Acting in the County of _____

This document is exempt from state and county transfer taxes pursuant MCL 207.505(a) and MCL 207.526(a).

Prepared by/Return to:
Carl Garvey, General Counsel
RACER Trust
500 Woodward Avenue, Suite 2650
Detroit, MI 48226

EXHIBIT 1**LEGAL DESCRIPTION AND ILLUSTRATION OF PROPERTY BOUNDARY**

Land situated in the City of Burton, County of Genesee, State of Michigan, more particularly described as follows:

Tax ID: 59-10-100-031

Part of the North $\frac{1}{2}$ of Section 10, Town 7 North, Range 7 East, City of Burton, Genesee County, Michigan, and "Emerald Estates Subdivision", as recorded in Liber 38, Page 18, of Plats, Genesee County Records, and also part of vacated Donegal Street and vacated Flannigan Street, described as: Commencing at the North $\frac{1}{4}$ corner of Section 10, Town 7 North, Range 7 East, City of Burton, Genesee County, Michigan; thence North 88 degrees 02 minutes 45 seconds West, 1322.12 feet along the North line of said Section to the intersection of the West line of Donegal Street extended and the North line of Section 10; thence South 00 degrees 22 minutes 43 seconds East, 550.07 feet along the West line of Donegal Street extended to the Northwest corner of "Emerald Estates Subdivision"; thence continuing South 00 degrees 22 minutes 43 seconds East, 194.76 feet to the point of beginning; thence South 89 degrees 18 minutes 28 seconds East, 206.67 feet to a point on the Westerly line of Lot 1 of said subdivision; thence on a curve to the left, along the Westerly line of said Lot 1, having a radius of 153.80 feet, with a chord bearing and distance of North 39 degrees 38 minutes 31 seconds West, 141.98 feet; thence on a curve to the right, continuing along the Westerly line of Lot 1, having a radius of 93.80 feet, with a chord bearing and distance of North 33 degrees 44 minutes 17 seconds West, 103.25 feet to the Northwest corner of said Lot 1; thence South 88 degrees 02 minutes 45 seconds East, 763.74 feet along the North line of said subdivision to the Northeast corner of Lot 7 of said subdivision; thence South 00 degrees 16 minutes 59 seconds East, 109.87 feet along the East line of said Lot 7 to the Northwest corner of Lot 8 of said subdivision; thence South 88 degrees 02 minutes 45 seconds East, 433.71 feet along the North line of said subdivision; thence North 00 degrees 28 minutes 55 seconds West, parallel to the North-South $\frac{1}{4}$ line, 660.00 feet to the North line of Section 10; thence South 88 degrees 02 minutes 45 seconds East along the North line of Section 10, 66.00 feet to the North $\frac{1}{4}$ corner; thence South 00 degrees 28 minutes 55 seconds East along the North-South $\frac{1}{4}$ line, 300.00 feet; thence South 88 degrees 05 minutes 10 seconds East, parallel to the North line of Section 10, 30.00 feet; thence South 00 degrees 28 minutes 55 seconds East, parallel to the North-South $\frac{1}{4}$ line, 556.34 feet; thence due East, 74.53 feet; thence due South, 240.00 feet; thence due West, 72.51 feet to the North-South $\frac{1}{4}$ line; thence South 00 degrees 28 minutes 55 seconds East along the North-South $\frac{1}{4}$ line, 907.74 feet; thence South 65 degrees 16 minutes 21 seconds East, 311.57 feet; thence South 00 degrees 50 minutes 34 seconds West, 360.47 feet to the North line of the Grand Trunk Western Railroad right-of-way; thence North 89 degrees 15 minutes 08 seconds West, along said North line, 906.17 feet to the East line of the Consumers Power Substation property; thence North 00 degrees 22 minutes 32 seconds West, 464.18 feet to the Northeast corner of said Consumers Power property; thence South 89 degrees 37 minutes 28 seconds West, 723.12 feet to the East line of said Consumers Power property; thence North 00 degrees 22 minutes 43 seconds West, 1324.83 feet along said East line to the point of beginning.

Tax ID: 59-10-100-030

Part of the "Emerald Estates Subdivision", as recorded in Liber 38 of Plats, Page 18, Genesee County, Michigan Records and also part of vacated Donegal Street, described as follows: Commencing at the North $\frac{1}{4}$ of Section 10, Town 7 North, Range 7 East, City of Burton, Genesee County, Michigan; thence North 88 degrees 02 minutes 45 seconds West, along the North line of Section 10, a distance of 66.00 feet; thence South 00 degrees 28 minutes 55 seconds East, 660.00 feet to the North line of said "Emerald Estates Subdivision"; thence along said North line of "Emerald Estates Subdivision", North 88 degrees 02 minutes 45 seconds West, 433.71 feet and North 00 degrees 16 minutes 59 seconds West, 109.87 feet (platted as 110.00 feet) and North 88 degrees 02 minutes 45 seconds West, 763.74 feet (platted as 763.82 feet) to the Northwest corner of Lot 1 of said plat, and the point of beginning; thence along the Westerly line of said Lot 1, on a curve to the left, having a radius of 93.80 feet, with a chord bearing and distance of South 33 degrees 44 minutes 18 seconds East, 103.25 feet; thence on a curve to the right, having a radius of 153.80 feet, with a chord bearing and distance of South 39 degrees 38 minutes 29 seconds East, 141.98 feet; thence North 89 degrees 18 minutes 28 seconds West, 206.67 feet, to the West line of the East $\frac{1}{2}$ of the Northwest $\frac{1}{4}$ of said Section 10; thence North 00 degrees 22 minutes 43 seconds West, 194.75 feet to the North line extended West of said Lot 1 of "Emerald Estates Subdivision"; thence South 88 degrees 02 minutes 45 seconds East, 60.05 feet to the point of beginning.

Commonly known as: Davison Road Industrial Land, Burton, MI 48509

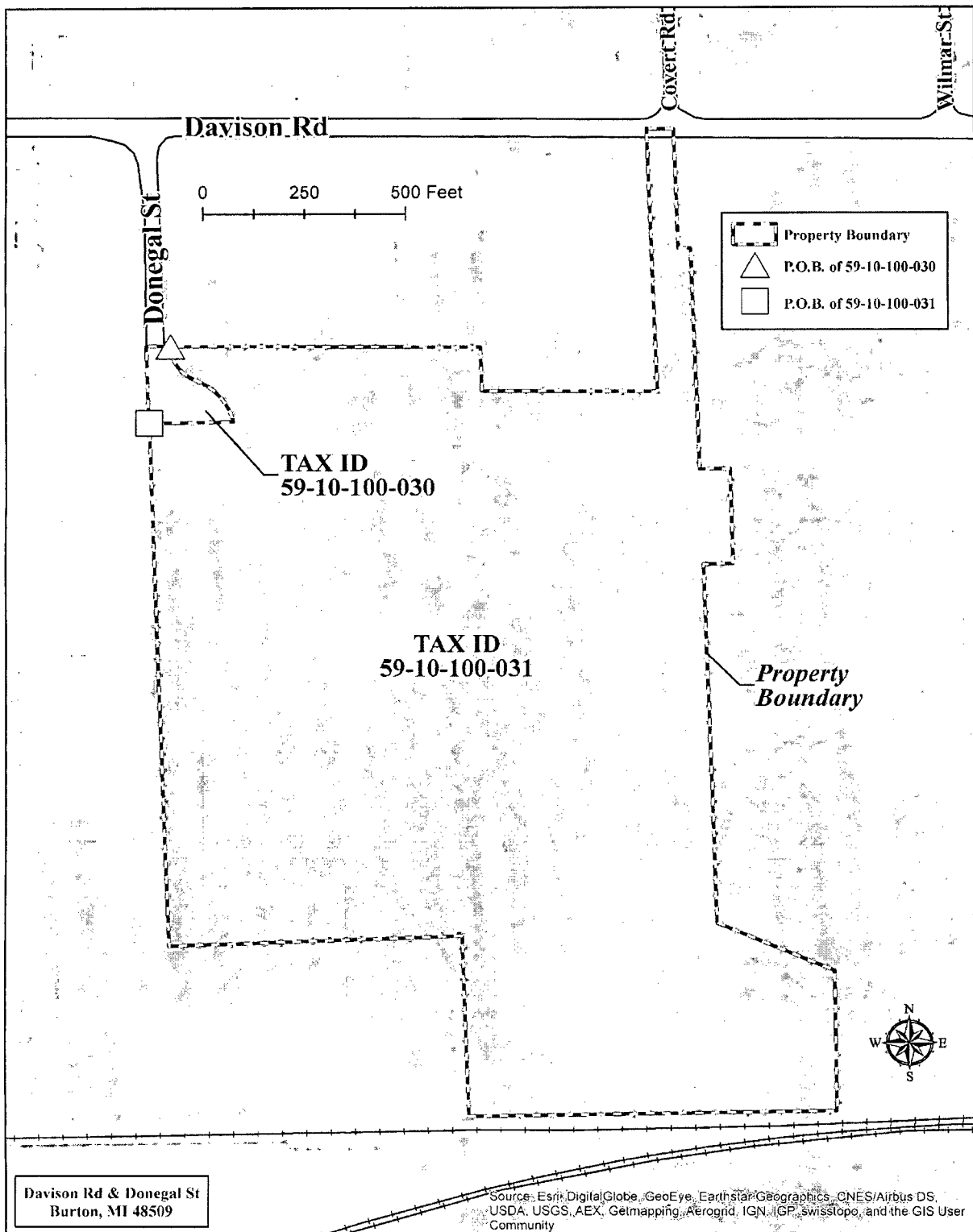


EXHIBIT 2

MDEQ LETTER APPROVING THIS AMENDED RESTRICTIVE COVENANT



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING DISTRICT OFFICE



C. HEIDI GREYER
DIRECTOR

March 27, 2017

RACER Properties LLC
500 Woodward Avenue, Suite 2650
Detroit, Michigan 48226

RECEIVED APR - 3 2017

ATTENTION: Mr. Dave Favero

SUBJECT: Notice of Approval of the Amended Restrictive Covenant for
Davison Road Industrial Land, Burton, Genesee County, Michigan;
Facility ID No.: 25000447

The Michigan Department of Environmental Quality (MDEQ) has reviewed the attached Amended Declaration of Restrictive Covenant (Amended Restrictive Covenant) for the property located at Davison Road Industrial Land located in Burton, Genesee County, Michigan, Facility ID No.: 25000447, Tax Identification Nos.: 59-10-100-30 (0.575 acres) and 59-10-100-031 (55.63 acres) (Property) and legally described in Exhibit 1 of the attached Amended Restrictive Covenant. The Amended Restrictive Covenant is hereby approved subject to the Amended Restrictive Covenant remaining protective of public health, safety, and welfare, and the environment. This Approval Letter is intended to be included as Exhibit 2 in the Amended Restrictive Covenant when recorded with the Register of Deeds.

Revitalizing Auto Communities Environmental Response Trust has undertaken response activities at this Property under applicable Sections of Part 201, Environmental Remediation, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended, MCL 324.20101, *et seq.* Response activities that were implemented to address environmental contamination are fully described in the site file available from the MDEQ, Remediation and Redevelopment Division, Lansing District Office.

The instrument number of the recorded Restrictive Covenant is 201309300105450, recorded on September 30, 2013, with the Genesee County Register of Deeds.

The land use and resource use restrictions contained in the Amended Restrictive Covenant are based on information available to the MDEQ at the time the Restrictive Covenant was amended.

Based upon our evaluation of the Amended Restrictive Covenants and other information identified above pertaining to current site conditions, the MDEQ has determined that the restrictions contained in the Amended Restrictive Covenant are necessary to protect public health, safety, and welfare, and the environment in accordance with Part 201. The MDEQ expresses no opinion as to other contaminants beyond those identified and remediated as a part of the Amended Restrictive Covenant that relate to this Property.

CONSTITUTION HALL • 525 WEST ALLEGAN STREET • P.O. BOX 30242 • LANSING, MICHIGAN 48909-7742
www.michigan.gov/deq • (517) 284-6651

RACER Properties LLC

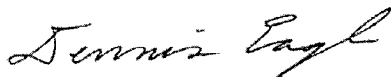
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March 27, 2017

The MDEQ also makes no warranty as to the fitness of this Property for any general or specific use, and prospective purchasers or users are advised to use due diligence prior to acquiring or using this Property.

If you have questions, please contact Mr. Jim Innes, project manager, at 517-284-5115, or innesj@michigan.gov; or you may contact me.

Sincerely,



Dennis Eagle, District Supervisor
Lansing District Office
Remediation and Redevelopment Division
517-284-5089
eagled@michigan.gov

Attachment

cc: Mr. Mitch Adelman, MDEQ
Ms. Kimberly Tyson, MDEQ
Mr. Kevin Schrems, MDEQ
Mr. Jim Innes, MDEQ

EXHIBIT 3

HAZARDOUS SUBSTANCES ABOVE CRITERIA IN SOILS AND GROUNDWATER

Media	Substance	Criteria ¹ Exceeded
Soil	Ethylbenzene	NRDWP
	Naphthalene	NRDWP
	Styrene	NRDWP, GSIP
	Tetrachloroethylene	NRDWP, GSIP
	Trichloroethene	GSIP
	Fluoranthene	GSIP
	Phenanthrene	GSIP
	Aluminum	NRDWP
	Arsenic	NRDWP, GSIP
	Cobalt	NRDWP, GSIP
	Iron	NRDWPI
	Manganese	NRDWP, GSIP
	Selenium	GSIP
	Fluorene	NRDWP, GSIP
	Pentachlorophenol	GSIP
	Mercury	GSIP
	Dibenzofuran	GSIP
	Carbazole	GSIP
	Xylenes	GSIP

Media	Substance	Criteria ^{1,2} Exceeded
Groundwater	Arsenic	NRDW, GSI
	Iron	NRDW,
	Manganese	NRDW

SOIL

NRDWP- Non-Residential Drinking Water Protection

GSIP – Groundwater Surface Water Interface Protection

GROUNDWATER

NRDW – Non-Residential Drinking Water Criteria

GSI – Groundwater Surface Water Interface Criteria

1 – 1 – The substances and exceedances listed in this exhibit are based on a comparison of the data for the Property to MDEQ Part 201 Generic Cleanup Criteria – Non-Residential Soil and Groundwater Criteria, Table 1 and Table 2, dated December 30, 2013. However, it is noted that as of the date of this Restrictive Covenant, USEPA's authorization of the MDEQ RCRA Program includes the September 28, 2012 Part 201 Generic Cleanup Criteria.

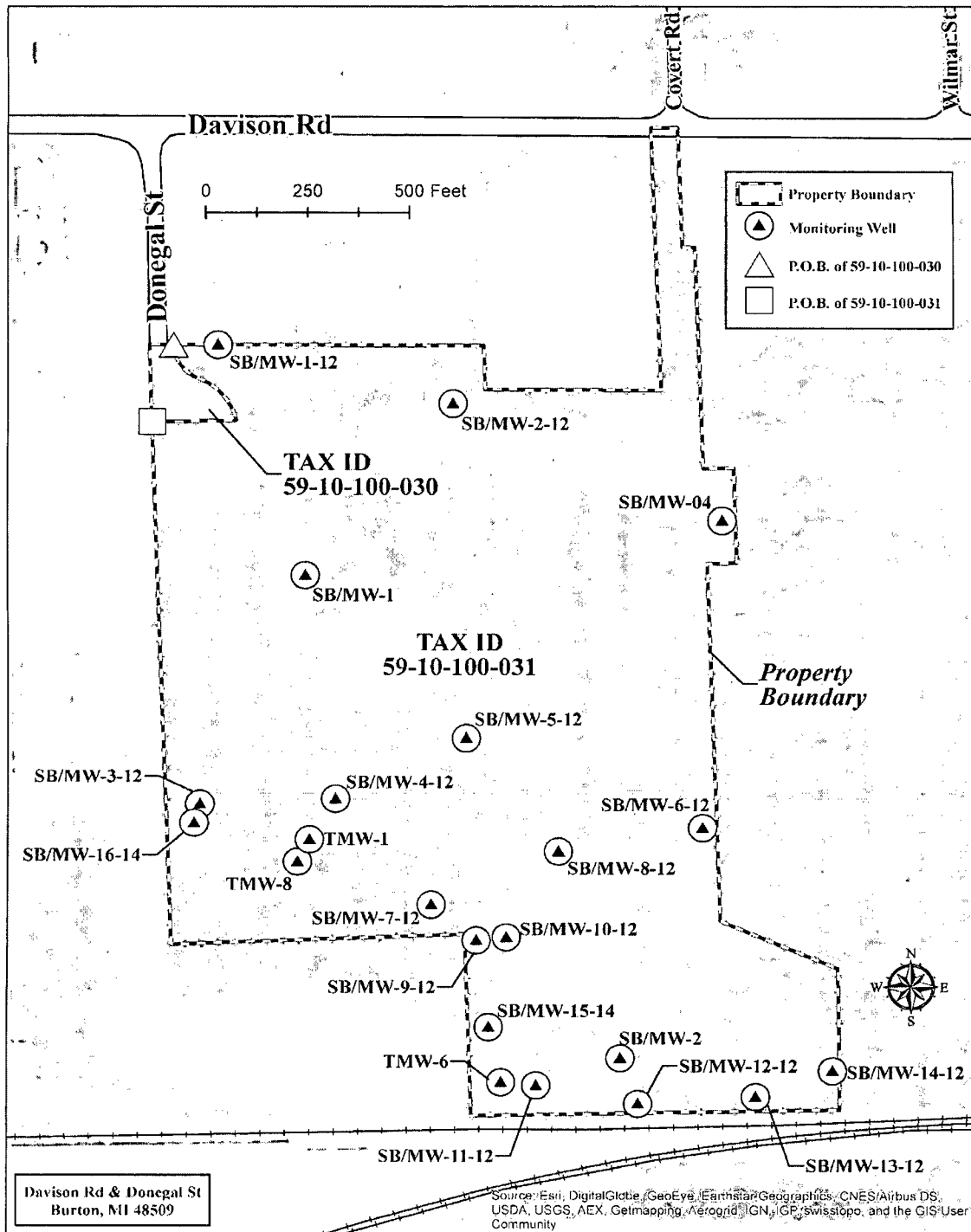
2 - GSI Criteria were calculated pursuant to the "Calculation of Generic Facility-Specific Part 201 GSI Criteria for (G) Hazardous Substances" for Cadmium, Copper, Manganese and Zinc

EXHIBIT 4**DESCRIPTION OF ALLOWABLE USES**

Nonresidential Land Use: This land use is characterized by any use which is not residential in nature and is primarily characterized by industrial and commercial uses. Industrial uses typically involve manufacturing operations engaged in processing and manufacturing of materials or products. Other examples of industrial uses are utility companies, industrial research and development, and petroleum bulk storage. Commercial uses include any business or income-producing use such as commercial warehouses, lumber yards, retail gas stations, auto dealerships and service stations, as well as office buildings, banks, and medical/dental offices (not including hospitals). Commercial uses also include retail businesses whose principal activity is the sale of food or merchandise within an enclosed building and personal service establishments which perform services indoors such as health clubs, barber/beauty salons, photographic studios, etc.

Any residential use is specifically prohibited from the nonresidential land use category. This would include the primary use of the property for human habitation and includes structures such as single family dwellings, multiple family structures, mobile homes, condominiums, and apartment buildings. Residential use is also characterized by any use which is intended to house, educate, or provide care for children, the elderly, the infirm, or other sensitive populations, and therefore could include day care centers, educational facilities, hospitals, elder care facilities, and nursing homes. The use of any accessory building or portion of an existing building as a dwelling unit permitted for a proprietor or storekeeper and their families, located in the same building as their place of occupation, or for a watchman or caretaker is also prohibited. Any authority that allows for residential use of the Property as a legal non-conforming use is also restricted per the prohibitions contained in this restrictive covenant.

EXHIBIT 5
MONITORING WELLS



MONITORING WELL IDENTIFICATION NUMBERS AND LOCATIONS

Well ID	Northing	Easting
SB/MW-1	558431.7852'	13320590.9320'
SB/MW-1-12	559022.8272'	13320366.6520'
SB/MW-2	557210.8073'	13321359.7560'
SB/MW-2-12	558864.4270'	13320935.9059'
SB/MW-3-12	557867.7706'	13320330.3884'
SB/MW-04	558576.5678'	13321606.7178'
SB/MW-4-12	557852.4469'	13320647.6418'
SB/MW-5-12	558018.5684'	13321018.0688'
SB/MW-6-12	557810.4848'	13321572.9262'
SB/MW-7-12	557611.2403'	13320911.6875'
SB/MW-8-12	557750.0727'	13321192.2475'
SB/MW-9-12	557520.0892'	13321024.5887'
SB/MW-10-12	557529.0797'	13321089.4155'
SB/MW-11-12	557146.2615'	13321181.1405'
SB/MW-12-12	557107.9676'	13321429.4618'
SB/MW-13-12	557138.8266'	13321690.2595'
SB/MW-14-12	557211.9121'	13321880.4688'
SB/MW-15-14	557304.0670'	13321043.5400'
SB/MW-16-14	557814.3070'	13320322.3600'
TMW-1	557773.6000'	13320589.4000'
TMW-6	557152.9000'	13321095.7000'
TMW-8	557711.5350'	13320575.9300'

Coordinates from Michigan State Plane Coordinate System NAD83, South zone, International Feet.