



January 21, 2015

Mr. Richard Conforti, P.E.

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

RE: Corrective Action Closure- Former Wastewater Treatment Plant
Coldwater Road Landfill, Flint, Michigan
MID 005 356 860
FILE: 15388 /51440/rep

Dear Mr. Conforti:

On behalf of Revitalizing Auto Communities Environmental Response (RACER) Trust, O'Brien & Gere is pleased to present this letter which serves as the Corrective Action closure request for the former wastewater treatment plant (WWTP) located at the Coldwater Road Landfill site (Figure 1).

SITE HISTORY

SITE DESCRIPTION

The RACER Trust Coldwater Road Landfill facility (Site) is located adjacent to and north of the RACER Trust former Peregrine U.S., Inc. property (RACER Trust former Peregrine property) as shown on the Site Plan, Figure 1. The RACER Trust Coldwater Road Landfill facility consists of the stabilized wastewater treatment sludge monofill landfill, restored wetlands, and leachate accumulation facility. The former WWTP previously was located on the Coldwater Road Landfill property and was decommissioned and demolished in 1999. The Coldwater Road landfill property is bordered on the south by the RACER Trust former Peregrine property, which formerly contained several manufacturing buildings and support facilities. The buildings on the RACER Trust former Peregrine property were decommissioned and demolished between 1999 and 2001. A figure depicting the division between the RACER Coldwater Road Landfill facility and the RACER Trust former Peregrine property is included as Figure 2.

SITE OWNERSHIP

On December 10, 1996, an asset Purchase Agreement for the manufacturing portion of the Coldwater Road site, which is now referred to as the "RACER Trust former Peregrine property, MIR 000 020 743", was signed by General Motors (GM) and Peregrine. GM retained ownership of the northern portion, which is now referred to as the "RACER Trust Coldwater Road Landfill facility MID 005 356 860", and sold the manufacturing facility (former Peregrine property). In August 1999, Remediation and Liability Management Company, Inc. (REALM - a wholly owned subsidiary of GM) took back ownership of the manufacturing facility from Peregrine. In April 2000 a Michigan Department of Environmental Quality (MDEQ) Notification of Regulated Waste Activity form (EQP5150) and United States Environmental Protection Agency (USEPA) Hazardous Waste Permit Application Part A (USEPA form 8700-23) were submitted to document change of ownership of the landfill and the former WWTP property from GM to REALM. REALM, a wholly-owned subsidiary of GM, managed the Resource Conservation and Recovery Act (RCRA) closure program for the REALM Coldwater Road Landfill facility under the 1992 Corrective Action Consent Order (CACO) until REALM filed for bankruptcy in October 2009 at which time Motors Liquidation Company (MLC), which was the former GM after its June 2009 bankruptcy filing,

37000 Grand River Avenue, Suite 260, Farmington Hills, MI 48335 | p 248-477-5701 | f 248-477-5962 | www.obg.com

assumed management of the property. The RACER Trust was created on March 31, 2011 by the U.S. Bankruptcy Court to clean up and position for redevelopment properties and facilities owned by MLC. The Coldwater Road Landfill facility (including the former WWTP) and the former Peregrine property were two of the properties assigned to RACER Trust. RACER Trust currently manages the RCRA closure program for the Coldwater Road Landfill facility under the 1992 CACO.

RCRA CLOSURE

Several of the RCRA units and Solid Waste Management Units (SWMUs) were closed in accordance with the 1989 Closure Plan during construction of the on-site hazardous waste landfill between 1990 and 1994. Roy F. Weston, Inc. (Weston) provided quality assurance oversight and closure verification during this construction phase. As documented in the Draft Closure Certification Documentation Package (Weston, November 1994), there were several units not closed at the completion of landfill construction. Closure of these remaining units was completed between 1994 and 2003 with oversight provided by O'Brien & Gere. Closure documentation for all units covered under the CACO for the RACER Trust Coldwater Road Landfill facility is provided in the following seven final closure reports along with the MDEQ approved closure certification date:

- Final Closure Certification Documentation Package -Decontamination Pits and Sump, Chromium Reduction Basins at the WWTP, September 1998, Roy F. Weston, Inc. (Weston). MDEQ closure certification provided in a letter dated March 24, 2005.
- Subsurface Investigation of Decontamination Pits/Sump and Chromium Reduction Basins Report, June 1999, O'Brien & Gere Engineers, Inc. (O'Brien & Gere). MDEQ closure certification provided in a letter dated October 15, 1999.
- Final Closure Certification, former Drum Storage Area and Waste Pile Pad, June 1999, Weston. MDEQ closure certification provided in a letter dated March 24, 2005.
- Part I - Final Closure Certification Documentation, November 2000, O'Brien & Gere and subsequent data submittals. MDEQ closure certification in a letter dated March 24, 2005.
- Part II - Final Closure Certification Documentation, November 2000, Weston and subsequent data submittals. MDEQ closure certification provided in a letter dated March 24, 2005.
- Addendum to the June 1999 Closure Certification Report for the Former Drum Storage Area at the Former Peregrine, U.S., Inc. Property at the Coldwater Road Facility, January 2005, O'Brien and Gere. MDEQ closure certification provided in a letter dated March 24, 2005.

The former WWTP was not listed in the 1992 CACO for the Site. The following closure certification reports document the closure activities associated with former WWTP:

- Addendum to the June 1999 Closure Certification Report for the Former Wastewater Treatment Plant at the Coldwater Road Facility, September 2008, O'Brien and Gere.
- Addendum to the June 1999 Closure Certification Report for the Former Wastewater Treatment Plant at the Coldwater Road Facility, April 2013, O'Brien and Gere.

The regulatory background for the WWTP is discussed in the following Section.

FORMER WASTEWATER TREATMENT PLANT BACKGROUND

The former WWTP at the Coldwater Road Landfill facility was located at the southwestern corner of the property as shown on Figure 1 (Site Plan). The WWTP was constructed in the early 1950s to treat plating waste streams as generated by the manufacturing facility located on the former Peregrine property. Plating operations ran from 1953 to 1987. Process wastewater from the former manufacturing plant discharged to the former WWTP through force mains. Chemical/physical treatment of the process wastewater was performed at the

former WWTP on a batch basis. The chromium, nickel, and acid/alkali wastes were combined and treated for heavy metal removal, whereas the copper-cyanide waste was treated separately.

Use of the WWTP was terminated in December 1996 when the manufacturing plant was sold to Peregrine, Inc. The WWTP building and associated basins were subsequently decontaminated and demolished by REALM between December 1998 and May 1999.

REALM also voluntarily implemented an investigation at the former WWTP to evaluate potential releases from the surrounding basins between September 1998 and May 1999. The former WWTP basin investigation was performed in accordance with procedures outlined in O'Brien & Gere's January 1999 Quality Assurance Project Plan (QAPP) for the Coldwater Road facility and Three Basement Basin Sampling and Analysis Plan (SAP). It should be noted that during this investigation three soil borings were proposed to be monitoring wells. However, wet subsurface soil conditions were not observed during soil boring installation; therefore, no wells were installed.

The basin investigation included collection of subsurface soil samples underneath and around the former WWTP and surrounding basins, concrete samples from the basins and former WWTP basement floor, rinsate samples, and groundwater samples from two existing monitoring wells located southwest of the former WWTP. Results of the basin investigation were reported to MDEQ in the Former WWTP Basin Investigation Report dated November 2000. The results supported closure approval and no further action for the former WWTP basins and surrounding area. However, in a letter from the MDEQ Waste and Hazardous Material Division (WHMD) dated March 24, 2005, MDEQ did not extend the "no further action" determination to the former WWTP. MDEQ indicated that the requirements specified in the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (NREPA) Parts 111 and 201, specifically, the dissolved lead in groundwater was not delineated.

A Work Plan was prepared and submitted to MDEQ in April 2006, which addressed the issues raised in their March 24, 2005 letter. The Work Plan proposed investigating the concentrations of dissolved lead in groundwater at the former WWTP. MDEQ reviewed the Work Plan and after minor modifications were included, the Work Plan was approved in a letter dated January 26, 2007. Results of the December 2006 Work Plan investigation were reported to MDEQ in the 2008 Addendum Report dated September 2008. The results supported closure approval and no further action for the former WWTP basins and surrounding area. However, in a letter from MDEQ WHMD dated March 24, 2009, MDEQ comments to the 2008 Addendum Report indicated that several issues remained unresolved; specifically, that the dissolved iron and manganese in groundwater were not delineated horizontally, and that one of the report's conclusions, that shallow groundwater at the Site was not in an aquifer, could not be supported unless that designation is formally approved through submittal of a Groundwater Not In An Aquifer (GWNIAA) Determination. Additionally, in a teleconference call on May 4, 2009, the MDEQ expressed concern that volatile organic compounds (VOCs) in soil were not delineated vertically.

A response to MDEQ comments on the 2008 Addendum Report was submitted to MDEQ on July 13, 2009. The response addressed the GWNIAA issue and two of the three delineation concerns (iron and VOCs) that were raised by MDEQ. The July 13, 2009 response also proposed an additional investigation to address the third delineation concern (dissolved manganese in groundwater). MDEQ approved the response to their comments and approved the additional investigation in a letter dated September 26, 2011.

O'Brien & Gere completed investigation of the former WWTP in a phased approach following MDEQ approval of the July 13, 2009 Work Plan. The installation of monitoring wells was performed on October 10, 2011 (monitoring well locations depicted on Figure 2) and two subsequent groundwater sampling events were performed on November 4, 2011 and April 5, 2012.

Groundwater analytical results from two quarters (November 2011 & April 2012) of groundwater sampling, along with previous groundwater analytical results, document that the manganese impact at the former WWTP had been assessed to the revised site-specific background value for dissolved manganese (0.708 mg/l), which was presented in the Addendum to the June 1999 Closure Certification Report for the Former Wastewater Treatment Plant dated April 2013. MDEQ did not respond to this Closure Certification Report because they wanted to review the results from a pending groundwater investigation in the vicinity of OBG MW-10 at the former Peregrine facility proposed by Conestoga-Rovers & Associates (CRA), the RACER Trust consultant for the former Peregrine facility.

MANGANESE DELINEATION IN GROUNDWATER

CRA and RACER Trust met with MDEQ on June 11, 2013 and agreed to complete an additional investigation in the vicinity of OBG MW-10 to delineate the extent of manganese impact to groundwater at the former Peregrine facility. The investigation was completed in accordance with the MDEQ-Approved CRA Supplemental RFI Groundwater Investigation Work Plan dated September 16, 2013. The investigation was documented in a Memorandum from CRA dated January 28, 2014 (included in Exhibit A) submitted to the MDEQ.

The investigation included the installation of nine soil borings surrounding monitoring wells OBG MW-9 and OBG MW-10 as shown on Figure 3. The borings were advanced until groundwater was encountered or to a maximum depth of 20 ft below grade (fbg). Groundwater was not encountered at four of the nine boring locations (BH-116, BH-118, BH-119 and BH-120) and five locations (BH-112, BH-113, BH-114, BH-115, BH-117 and BH-121) produced a sufficient volume of water for sample collection. Boreholes in which groundwater was observed were sampled using low-flow sampling methods with samples collected when turbidity readings of 10 NTUs or less were observed. Groundwater samples from the five boreholes were sampled for dissolved and total manganese. Results of the investigation indicated dissolved manganese results from three boreholes east of wells OBG MW-9 and OBG MW-10 (BH-113, BH-114, and BH-115) were above the OBG calculated site-specific background. During the installation of the off-site boreholes (BH-118, BH-119, BH-120 and BH-121) groundwater was observed at one location (BH-121). A dissolved manganese sample was collected and analyzed from this borehole location (BH-121), with results indicating a concentration of dissolved manganese below the Site-specific background value. The groundwater analytical results for this groundwater investigation and previous samples collected from OBG MW-9 and OBG MW-10 are summarized on Table 1 and Figure 3. The results of this investigation were presented to the MDEQ in a draft Memorandum dated December 13, 2013. The draft Memorandum concluded the extent of manganese impacted groundwater at well OBG MW-10 has been delineated through groundwater sample collection and through documenting a lack of saturated zone west of OBG MW-10 deeming offsite migration to the west unlikely. In an email dated January 21, 2014 from the MDEQ (Richard Conforti) to RACER Trust (David Favero), the MDEQ agreed with the conclusions of the draft Memorandum and no further action is required to evaluate the off-site migration/delineation of manganese impacted groundwater in the vicinity of OBG MW-10. The final Memorandum was issued to the MDEQ on January 28, 2014.

CONCLUSIONS

As reported in the January 28, 2014 Memorandum, and in the Addendum to the June 1999 Closure Certification Report for the Former Wastewater Treatment Plant (WWTP) dated April 2013, an evaluation of pertinent migration pathways at the former WWTP concludes that compliance with Generic Non-Residential cleanup criteria is achieved for the former WWTP with the condition that the current Declaration of Restrictive Covenant will be supplemented to restrict groundwater use at the entire Coldwater Road Landfill Site. Therefore, based on the results of investigation activities and the migration pathway evaluation, closure of the former WWTP pursuant to NREPA Part 111 is achieved and no further action is requested for the former WWTP.

Post-closure activities associated with the landfill are continuing in accordance with the current MDEQ-approved Post-Closure Care Plan dated October 2014. Following MDEQ approval of closure for the former WWTP, RACER anticipates implementing a supplemental Declaration of Restrictive Covenant and establishing a post-closure operating license for the entire Coldwater Road Landfill facility. Once the post closure operating license is established, RACER will request termination of the Corrective Action Consent Order.

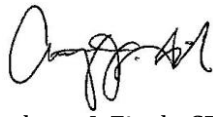
If you have any questions, please feel free to contact either David Favero with RACER Trust at (734) 879-9525 or Tony Finch at (248) 477-5701.

Very truly yours,
O'BRIEN & GERE ENGINEERS, INC.



Scott L. Cormier, PE
Vice President

Very truly yours,
O'BRIEN & GERE ENGINEERS, INC.



Anthony J. Finch, CPG
Senior Project Geologist

ENCLOSURES:

Table 1 – Groundwater Analytical Results

Figure 1 – Site Plan

Figure 2 – Monitoring Well Locations

Figure 3- Groundwater Delineation Locations

Attachment A – CRA Memorandum dated January 28, 2014

cc: David Favero – RACER Trust
Clifford Yantz- O'Brien & Gere

TABLES

Table 1
RACER Trust
Coldwater Road Landfill Facility - Former WWTP
Groundwater Analytical Results
Manganese - Method 200.8

	Total Manganese	Dissolved Manganese
OBG MW-4	0.118	---
OBG MW-5	0.532	0.520
OBG MW-7	0.212	---
OBG MW-8	0.371	---
OBG MW-9	0.591	0.562
OBG MW-10	2.62	2.57
BH-111	Dry to 20 ft.	
BH-112	14	1.2
BH-113	---	1.6
BH-114	---	2.7
BH-115	---	0.9
BH-116	Dry to 20 ft.	
BH-117	0.088/0.09	0.1/0.088
BH-118	Dry to 20 ft.	
BH-119	Dry to 20 ft.	
BH-120	Dry to 15 ft.	
BH-121	---	0.24
BK-3-00	Dry to 30 ft.	
	Total Manganese	Dissolved Manganese
FMR WWTP - Site Specific Background	0.708 ⁶	0.708
Part 201 ⁷	0.05	0.05

Notes:

- 1) Results and criteria are shown in mg/l (ppM).
- 2) Samples analyzed by Merit Laboratories, Inc. of East Lansing, Michigan.
- 3) Yellow highlight denotes delineation results. Sample dates and locations are shown on Figure 3.
- 4) Bold type indicates concentration above WWTP Site-Specific Background and Part 201 Residential Health-Based Drinking Water criteria.
- 5) Site-specific background calculated in accordance with MDEQ Sampling Strategies and Statistical Training Materials for Part 201 Cleanup Criteria dated 2002 and USEPA ProUCL Technical Guide (USEPA 2010).
- 6) Adequate data to calculate a WWTP site-specific background for total manganese is not available, therefore, as a conservative measure total manganese concentrations will be compared to site-specific background concentrations for dissolved manganese.
- 7) The MDEQ Part 201 criteria is the residential/non-residential health-based drinking water criteria (dated 9/28/2012).
- 8) '---' denotes the sample was not collected or not analyzed.
- 9) Samples were not collected at the six dry boreholes.
- 10) Data for the CRA boreholes and temporary well are from the CRA memo to Mr. Richard Conforti, dated 1/28/2014, concerning the "Summary of Investigation of Potential Groundwater Migration In The Vicinity of OBG MW-10 Former Peregrine (US) Inc. (Peregrine) Coldwater Road Facility ".

FIGURES

I:\Racer_Trust\15388\51440.Coldwater-Rd-La.Docs\Reports\WWTP_Closure_cert\tr\Figures\001 - Site Plan - WWTP.mxd

PLOTDATE: 12/10/14 3:12:58 PM ffinchaj

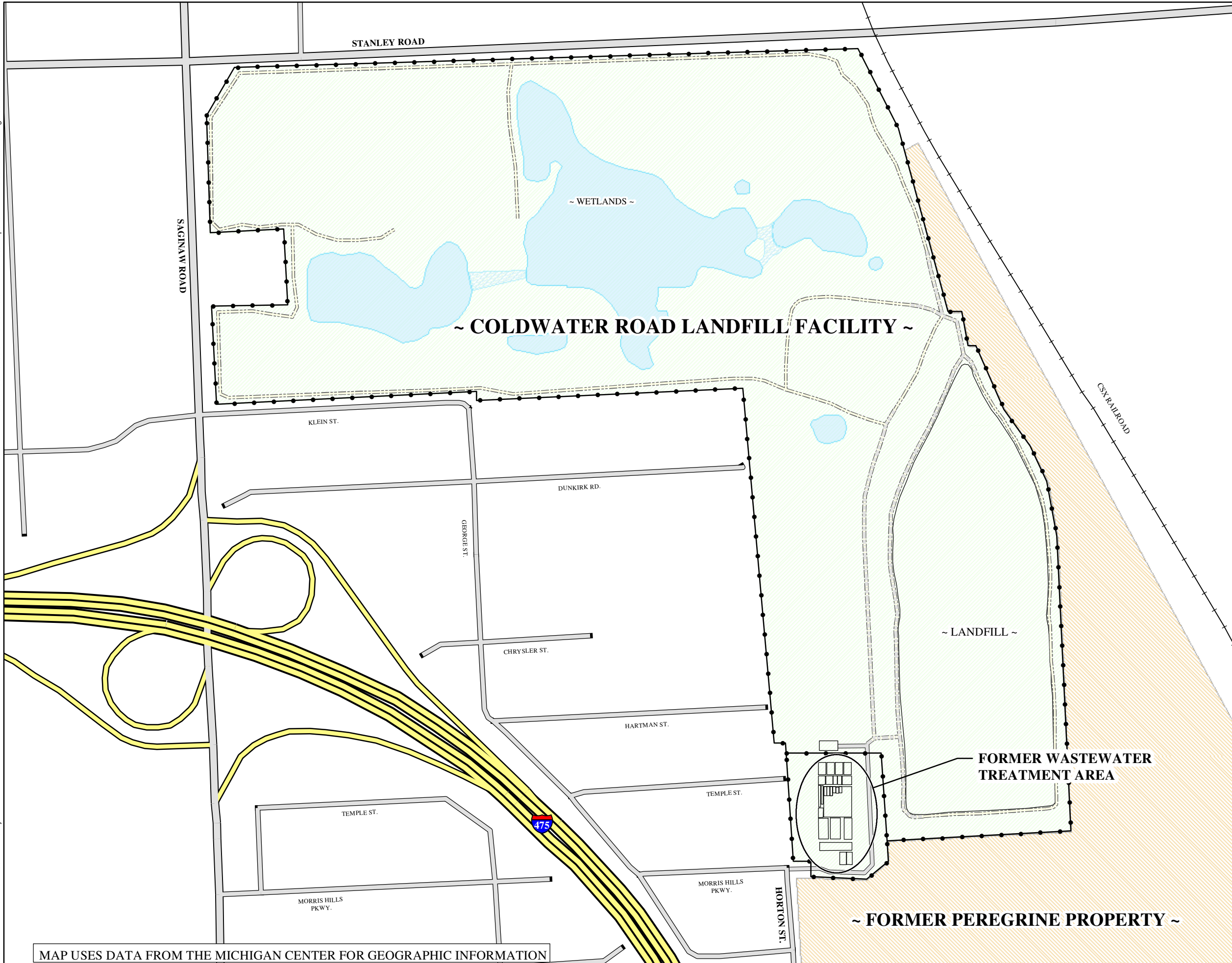




FIGURE 1

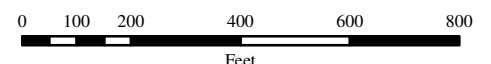


LEGEND

-  COLDWATER ROAD LANDFILL FACILITY
-  FORMER PEREGRINE PROPERTY

RACER TRUST
 COLDWATER ROAD
 FORMER WWTP
 FLINT, MICHIGAN

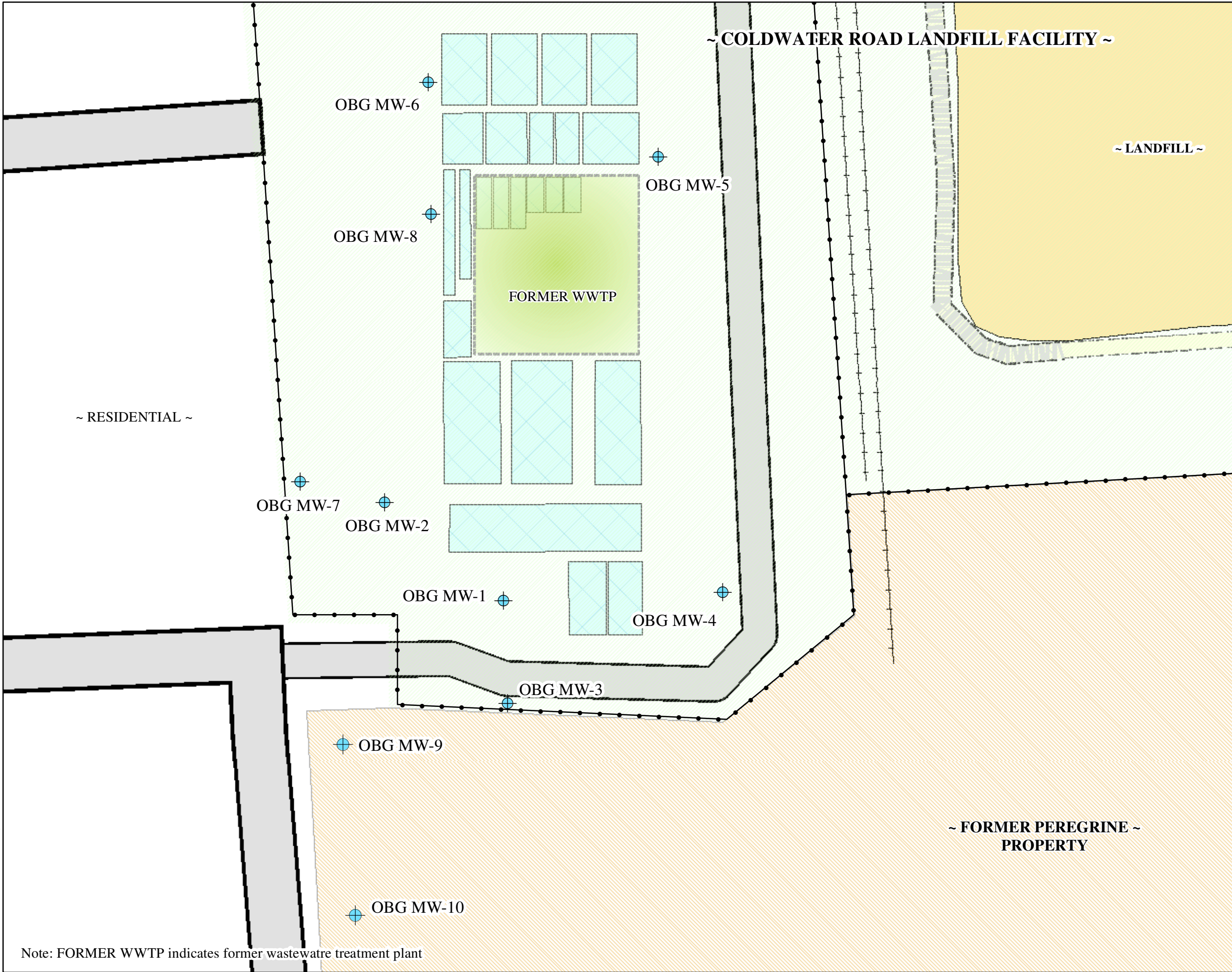
SITE PLAN



NOVEMBER 2014
 15388/51440-001



MAP USES DATA FROM THE MICHIGAN CENTER FOR GEOGRAPHIC INFORMATION






Note: FORMER WWTP indicates former wastewater treatment plant

FIGURE 2

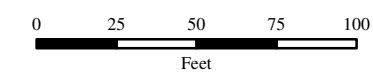


LEGEND

-  FORMER WWTP BUILDING
-  FORMER WWTP BASIN
-  MONITORING WELL LOCATION

RACER TRUST
COLDWATER ROAD
FORMER WWTP
FLINT, MICHIGAN

**MONITORING
WELL LOCATIONS**



NOVEMBER 2014
15388/51440-002



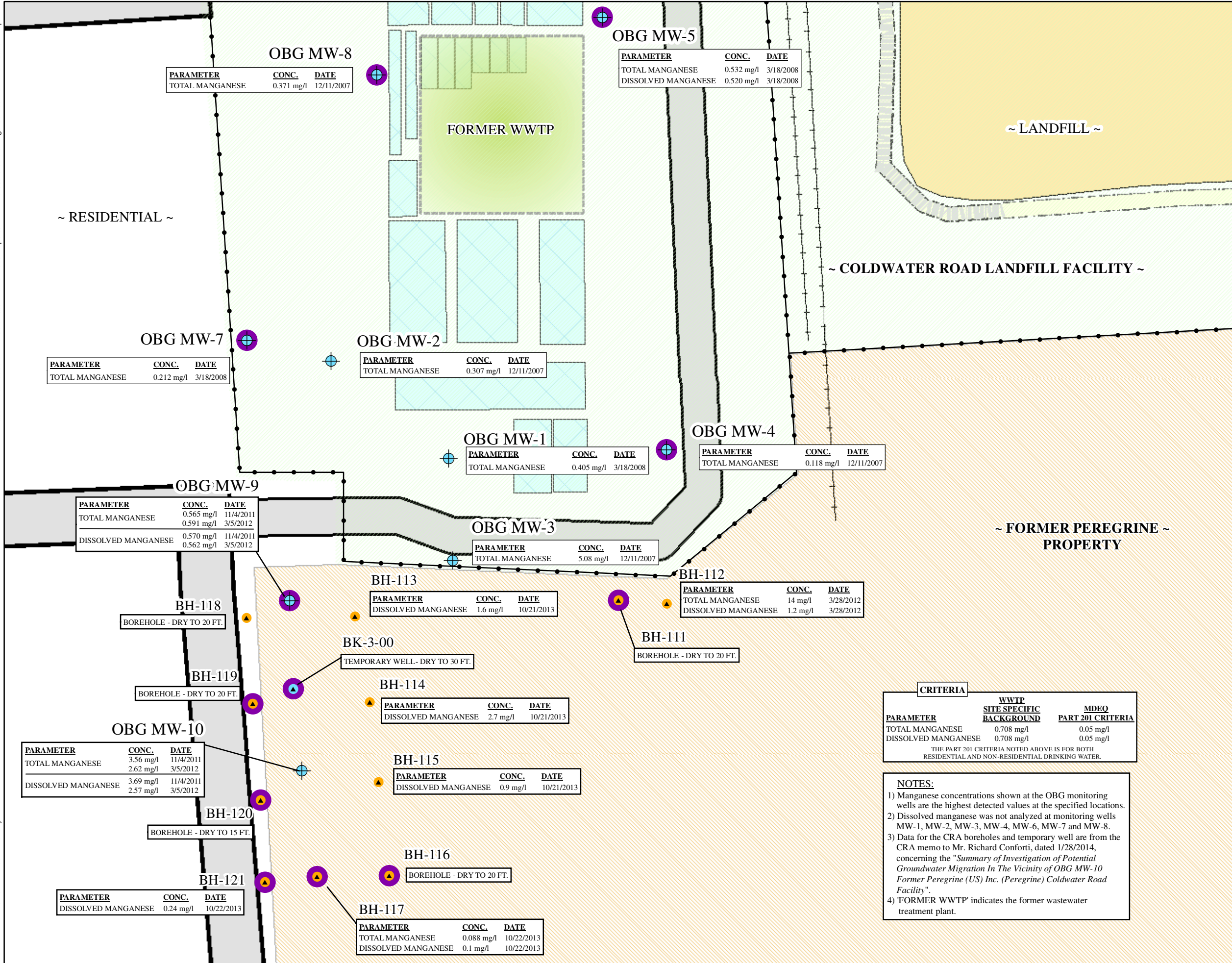


FIGURE 3



LEGEND

- FORMER WWTP BUILDING
- FORMER WWTP BASIN
- MONITORING WELL (OBG)
- TEMPORARY WELL (CRA)
- BOREHOLE (CRA)
- HIGHLIGHT COLOR DENOTES WELL OR BOREHOLE THAT DELINEATES MANGANESE BELOW THE WWTP SITE SPECIFIC BACKGROUND VALUE

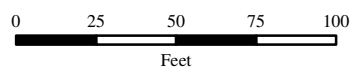
RACER TRUST
COLDWATER ROAD
FORMER WWTP
FLINT, MICHIGAN

**GROUNDWATER
DELINEATION
LOCATIONS**

CRITERIA		
PARAMETER	WWTP SITE SPECIFIC BACKGROUND	MDEQ PART 201 CRITERIA
TOTAL MANGANESE	0.708 mg/l	0.05 mg/l
DISSOLVED MANGANESE	0.708 mg/l	0.05 mg/l

THE PART 201 CRITERIA NOTED ABOVE IS FOR BOTH RESIDENTIAL AND NON-RESIDENTIAL DRINKING WATER.

- NOTES:**
- 1) Manganese concentrations shown at the OBG monitoring wells are the highest detected values at the specified locations.
 - 2) Dissolved manganese was not analyzed at monitoring wells MW-1, MW-2, MW-3, MW-4, MW-6, MW-7 and MW-8.
 - 3) Data for the CRA boreholes and temporary well are from the CRA memo to Mr. Richard Conforti, dated 1/28/2014, concerning the "Summary of Investigation of Potential Groundwater Migration In The Vicinity of OBG MW-10 Former Peregrine (US) Inc. (Peregrine) Coldwater Road Facility".
 - 4) 'FORMER WWTP' indicates the former wastewater treatment plant.



NOVEMBER 2014
15388/51440-003




Attachments

Attachment A

*CRA Memorandum dated
January 28, 2014*



MEMORANDUM

TO: Mr. Richard Conforti REF. NO.: 012636-T09


FROM: Michael Tomka/Richard Chatfield/kf/86 DATE: January 28, 2014

CC: Dave Favero/Grant Trigger (RACER), Tony Finch (OBG)
Jack Schinderle/John McCabe/Joe rogers/William Yocum (MDEQ)

RE: **Supplemental RCRA Facility Investigation
Summary of Investigation of Potential Groundwater Migration In The Vicinity of OBG MW-10
Former Peregrine (US) Inc. (Peregrine) Coldwater Road Facility
Genesee Township, Michigan**

Conestoga-Rovers & Associates (CRA) has prepared the following memorandum on behalf of Revitalizing Auto Communities Environmental Response Trust (RACER) and in accordance with Section 1.2 of the Supplement RFI Groundwater Investigation Work Plan and Groundwater Monitoring Plan submitted to the Michigan Department of Environmental Quality (MDEQ) on September 16, 2013 for the Former Peregrine (US) Inc. (Peregrine) Coldwater Road Facility in Genesee Township, Michigan (Site).

In accordance with Section 1.2 of the September 16, 2013 plan, a borehole investigation was completed in the vicinity of OBG MW-10 to evaluate potential off-Site migration of groundwater impacted by manganese concentrations exceeding residential and non-residential drinking water criteria. The borehole investigation was completed the week of October 21, 2013. In total, nine boreholes (BH-113 to BH-121) were advanced (5 on-Site and 4 off-Site) around OBG MW-9 and OBG MW-10. The borehole locations are presented in Figure 1 and the borehole completion details are summarized in Table 1. The borehole stratigraphic logs are presented in Attachment A. Borings were advanced until groundwater was encountered or to a maximum depth of 20 feet below ground surface (bgs).

Water was not encountered at four of the nine boreholes (BH-116, BH-118, BH-119, and BH-120). Of the nine boreholes advanced; five produced sufficient water to collect groundwater samples. Low flow sampling turbidity requirements of 10 NTU or less were achieved at one location (BH-117). Borehole water samples were collected (if water was present) from each borehole. Samples from the five boreholes where water was encountered were analyzed for total (if low flow sampling turbidity requirements could be achieved) and dissolved manganese (field filtered). The results of the groundwater samples are presented in Table 1; the laboratory analytical report is presented in Attachment B. Dissolved manganese results from three boreholes (BH-113 [1.6 milligrams per litre [mg/L]]; BH-114 [2.7 mg/L]; and, BH-115 [0.9 mg/L]) were found to exceed both Site-specific background (0.547 mg/L) and residential/non-residential drinking water aesthetic criteria (0.05 mg/L). Only one sample (BH-114) exceeded the non-residential health based drinking water standard of 2.5 mg/L. The groundwater sampling logs are presented in Attachment C.

Of the four off-Site boreholes, water was present at one location (BH-121). The dissolved manganese concentration at BH-121 was 0.24 mg/L; below the Site-specific background of 0.547 mg/L. The three additional off-Site locations encountered the top of clay between 1.5 to 5 feet bgs with the clay extending until the boreholes terminated (between 15-20ft bgs). Therefore, off-site migration of groundwater in this area is unlikely due to the limited saturated zone. Furthermore, no exceedances of screening criteria were observed in off-site groundwater in this area.

In addition, the on-Site extent of manganese impacted groundwater has been delineated; neither of the two southern most on-Site boreholes (BH-116 and BH-117) exceeded Site-specific background for total (0.963 mg/L) or dissolved manganese. Insufficient water was present at BH-116 to collect a sample. The groundwater sample from BH-117 had a reported total manganese concentration of 0.088 mg/L and a dissolved manganese concentration of 0.10 mg/L.

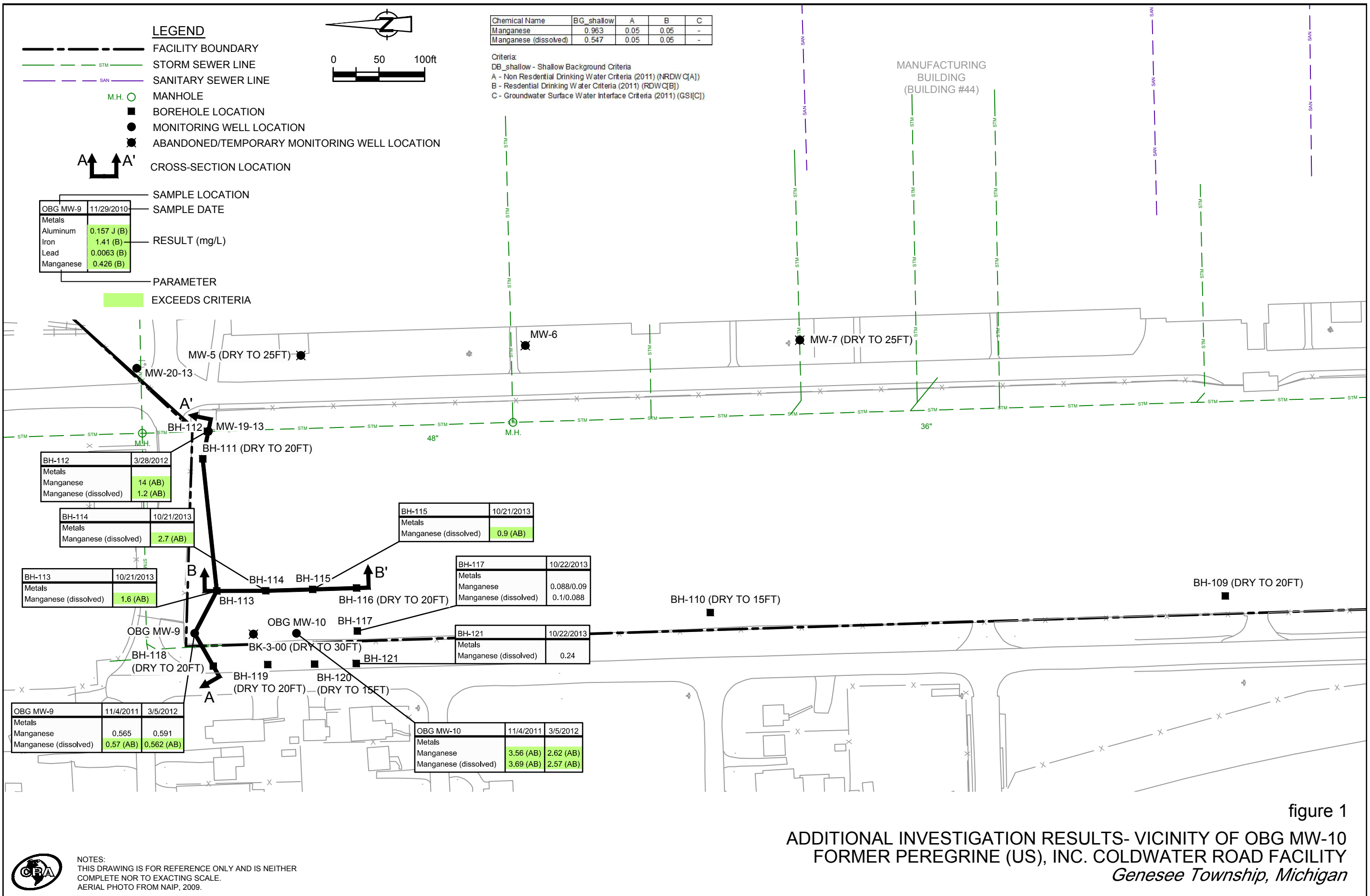
To the east, the storm sewer utility corridor running north-south acts as a barrier to possible groundwater migration. Figure 2 presents north-south and east-west cross-sections in the OBG MW-10 area. As presented in the cross-sections, all water bearing seams are located at a minimum elevation of 797 ft AMSL; however, the bedding material in the utility corridor extends to a minimum elevation of 785.5 ft AMSL. Therefore, in the event of groundwater migration to the east, the utility corridor would act as a barrier which would intersect and collect groundwater and prevent migration past the corridor. Groundwater would then be able to infiltrate into the storm sewer or travel along the utility corridor bedding.

The depth of saturated material encountered at MW-19-13 (screened in the storm sewer bedding) is approximately 21.4 feet bgs in this area. The depth of saturated material encountered in the vicinity of OBG MW-10 was a maximum of 14 feet bgs. In accordance with the Supplement RFI Groundwater Investigation Work Plan and Groundwater Monitoring Plan (CRA, 2013), groundwater monitoring will be performed quarterly at MW-19-13 to monitor groundwater quality in the utility corridor bedding. However, the groundwater sample collected from the BH-112 reported a dissolved manganese concentration of 1.2 mg/L which exceeded Site-specific background (0.547 mg/L) but did not exceed non-residential drinking water health based criteria. In addition, total manganese exceeded both Site-specific background (0.963 mg/L) and non-residential drinking water health based aesthetic criteria (2.5 mg/L) at a concentration of 14 mg/L.

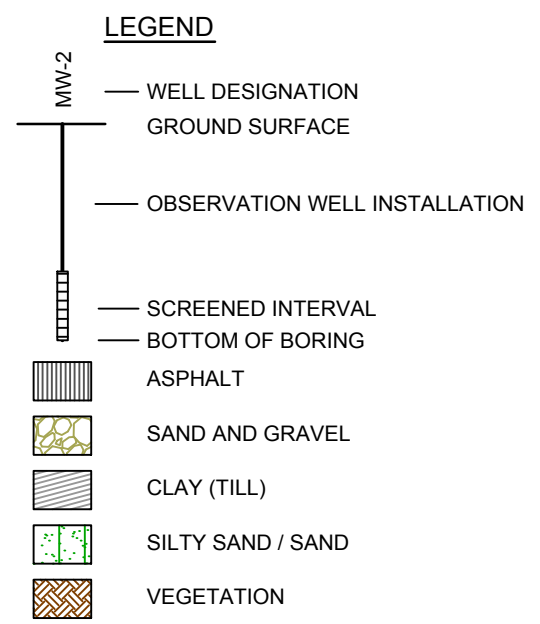
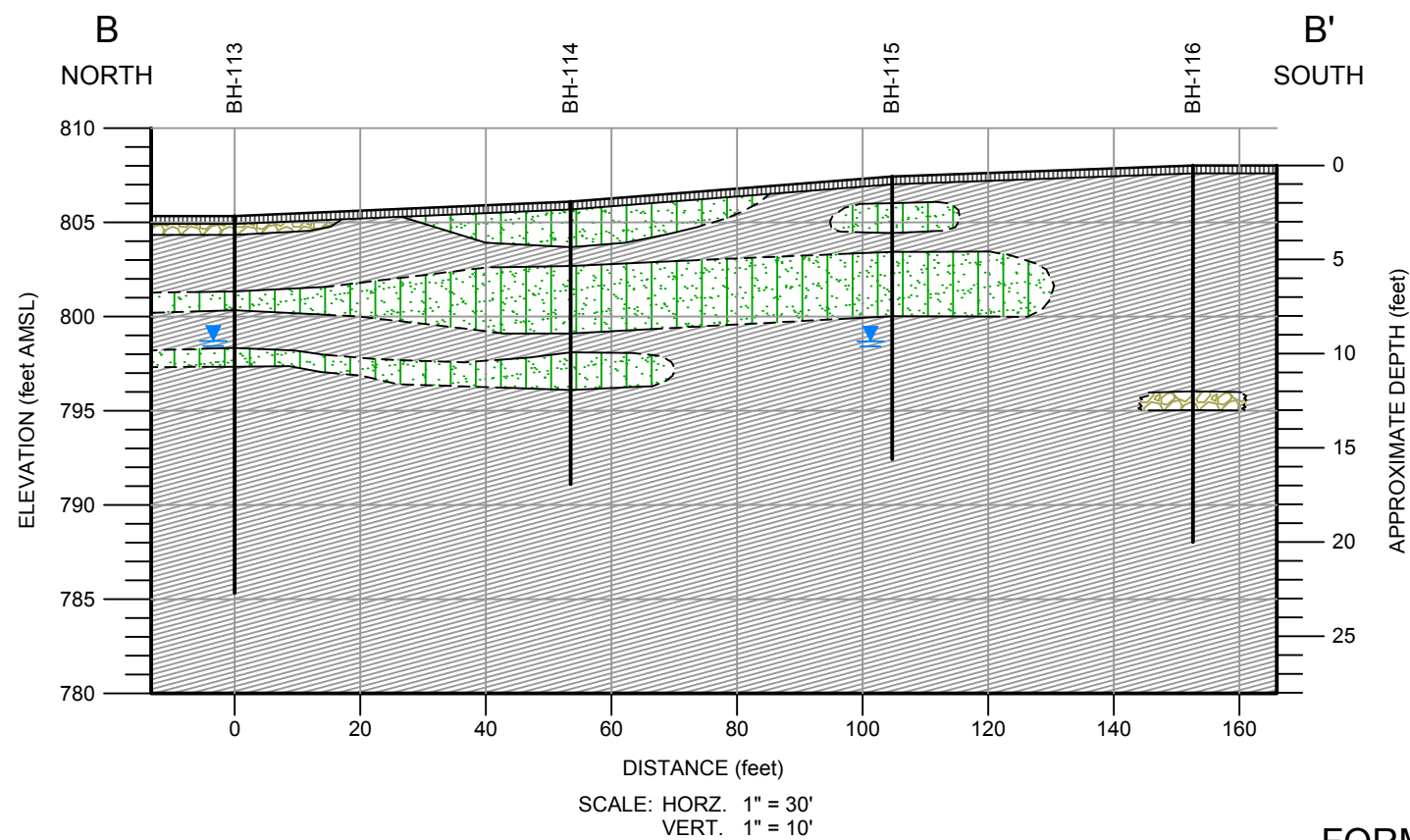
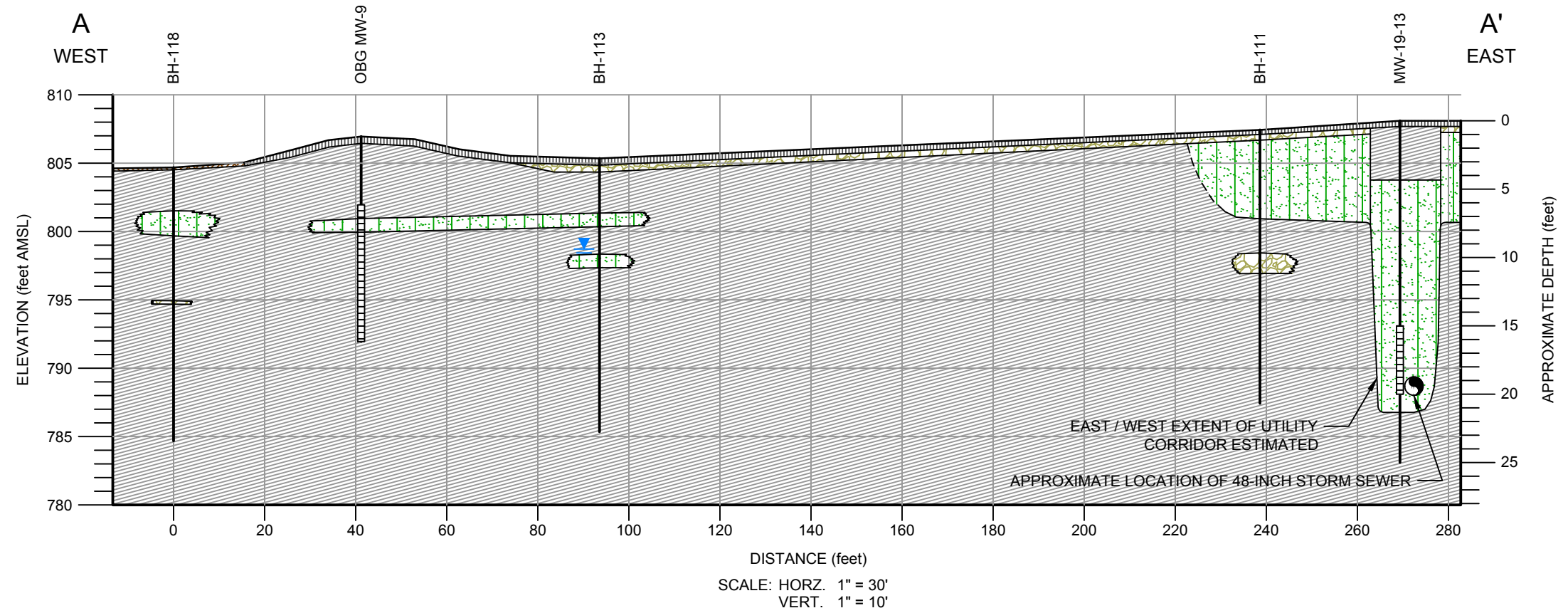
In summary, no groundwater with manganese concentrations above background levels was encountered off-Site to the west nor to the south of OBG MW-10 (on-site and off-site), and a utility corridor acts as a barrier to groundwater migration to the east of OBG MW-10; therefore, the extent of groundwater containing concentrations of manganese above background levels in the vicinity of OBG MW-10 has been delineated. Furthermore, additional investigation of manganese impacts to the north of OBG MW-10 has been completed by RACER on the adjacent property; a figure showing the off-Site detections of manganese is presented in Attachment D.

Therefore, CRA does not recommend any modifications (e.g., no monitoring is proposed for OBG MW-9 or OBG MW-10 and no additional new wells are proposed) to the groundwater monitoring program presented in the Supplement RFI Groundwater Investigation Work Plan and Groundwater Monitoring Plan (CRA, 2013). Furthermore, no further action is required to evaluate the potential for off-Site migration of manganese impacted groundwater in the vicinity of OBG MW-10. At this time, CRA recommends proceeding with the comprehensive annual groundwater monitoring event consisting of 13 perched water bearing unit locations and four drift aquifer wells as identified in Section 4.0 of the September 16, 2013 Supplement RFI Groundwater Investigation Work Plan and Groundwater Monitoring Plan. The work will be scheduled upon MDEQ approval of this assessment.

Should you have any questions or comments please feel free to contact us (519-884-0510).



NOTES:
 THIS DRAWING IS FOR REFERENCE ONLY AND IS NEITHER COMPLETE NOR TO EXACTING SCALE.
 AERIAL PHOTO FROM NAIP, 2009.



NOTE:
DASHED WHERE INFERRED.

figure 2
CROSS-SECTIONS A-A' AND B-B'
FORMER PEREGRINE (US), INC. COLDWATER ROAD FACILITY
Genesee Township, Michigan



TABLE 1
BOREHOLE COMPLETION DETAILS
FORMER PEREGRINE (US) INC. COLDWATER ROAD FACILITY
GENESEE TOWNSHIP, MICHIGAN

<i>Boring Location</i>	<i>Installation Date</i>	<i>Ground Surface Elevation ⁽¹⁾ (ft AMSL)</i>	<i>Depth of Boring (ft bgs)</i>	<i>Depth to Clay (ft bgs)</i>	<i>Screen Interval (ft bgs)</i>	<i>Turbidity (NTU)</i>	<i>Dissolved Manganese Concentration (mg/L)</i> Background ⁽³⁾ : 0.547mg/l	<i>Total Manganese Concentration (mg/L)</i> Background ⁽³⁾ : 0.963mg/l
BH-112	3/28/2012	808.09	25	21	15 to 20	--	1.2	14
BH-113	10/21/2013	805.34	20	8	7.52 to 12.52	86.8	1.6	--
BH-114	10/21/2013	806.11	15	10	4 to 12	126	2.7	--
BH-115	10/21/2013	807.44	15	9	7.39 to 12.39	15.8	0.9	--
BH-116	10/21/2013	808.03	20	0.5	(2)	--	--	--
BH-117	10/22/2013	807.87	15	12	10 to 15	4.25	0.1	0.088
BH-118	10/22/2013	804.68	20	5	(2)	--	--	--
BH-119	10/22/2013	805.15	20	1.5	(2)	--	--	--
BH-120	10/22/2013	805.56	15	1.7	(2)	--	--	--
BH-121	10/22/2013	805.78	20	No Clay	15 to 20	59.5	0.24	--
MW-19-13	10/21/2013	808.09	25	21.4	15 to 20	⁽⁴⁾	⁽⁴⁾	⁽⁴⁾

Notes:

Metals - Total and Dissolved Metals

Cyanide - Amenable cyanide

⁽¹⁾ Surveyed December 9, 2011⁽²⁾ No water present, screen not required⁽³⁾ MDEQ approved Site-specific background criteria; residential/non-residential criteria are below the background criteria⁽⁴⁾ New well location to be sampled as part of quarterly monitoring program

Attachment A

STRATIGRAPHY LOG (OVERBURDEN)

PAGE ____ OF ____

PROJECT NAME _____
 PROJECT NUMBER 12636
 CLIENT _____
 LOCATION _____

DRILLING CONTRACTOR _____
 DRILLER _____
 SURFACE ELEVATION _____
 WEATHER (A.M.) _____
 (P.M.) _____

HOLE DESIGNATION BH113
 DATE/TIME STARTED _____
 DATE/TIME COMPLETED _____
 DRILLING METHOD _____
 CRA SUPERVISOR SSH

STRATIGRAPHIC INTERVALS (DEPTHS IN $\frac{ft}{m}$ BGS)			SAMPLE DESCRIPTION	SAMPLE DETAILS										C H E M I C A L	A N A L Y S I S	G R A I N S I Z E	
F R O M	A T	T O	S A M P L E #	S A M P L E L I N E N O D E	PENETRATION RECORD SPLIT SPOON BLOWS (RECORD N-VALUES & RECOVERIES)						S A M P L E I N T E R V A L	P I D / F I D (ppm)					
					6"	6"	6"	6"	N	R							
0		5"															
5"		1															
1		2															
2		4															
4		5															
5																	
8		8															
8		14															
14		20															
NOTES AND COMMENTS			ORDER OF DESCRIPTORS: SOIL TYPE SYMBOL(S) - PRIMARY COMPONENT(S), (NATURE OF DEPOSIT), SECONDARY COMPONENTS, RELATIVE DENSITY/CONSISTENCY, GRAIN SIZE/PLASTICITY, GRADATION/STRUCTURE, COLOUR, MOISTURE CONTENT, SUPPLEMENTARY DESCRIPTORS NOTE: PLASTICITY DETERMINATION REQUIRES THE ADDITION OF MOISTURE IF THE SAMPLE IS TOO DRY TO ROLL (INDICATE IF MOISTURE WAS ADDED OR NOT).														
			DEPTH OF BOREHOLE CAVING _____			DEPTH OF FIRST GROUNDWATER ENCOUNTER _____			TOPSOIL THICKNESS _____			WATER LEVEL IN OPEN BOREHOLE ON COMPLETION _____			AFTER _____ HOURS _____		
			COMPLETION DETAILS: _____			NOTE: FOR EACH SPLIT-SPOON SAMPLE, RECORD BLOW COUNTS, N-VALUE, SAMPLE RECOVERY LENGTH, AND SAMPLE INTERVAL.											



STRATIGRAPHY LOG (OVERBURDEN)

PAGE ____ OF ____

PROJECT NAME _____
 PROJECT NUMBER 12636
 CLIENT _____
 LOCATION _____

DRILLING CONTRACTOR _____
 DRILLER _____
 SURFACE ELEVATION _____
 WEATHER (A.M.) _____
 (P.M.) _____

HOLE DESIGNATION BH114
 DATE/TIME STARTED 10/21/13
 DATE/TIME COMPLETED _____
 DRILLING METHOD _____
 CRA SUPERVISOR _____

STRATIGRAPHIC INTERVALS (DEPTHS IN ft/m BGS)			SAMPLE DESCRIPTION	SAMPLE DETAILS										S A M P L E #	S A M P L E L I N E N O D	P E N E T R A T I O N R E C O R D S P L I T S P O O N B L O W S (R E C O R D N - V A L U E S & R E C O V E R I E S)	S A M P L E I N T E R V A L	P I D / F I D (ppm)	C H E M I C A L	A N A L Y S I S	G R A I N S I Z E
F R O M	A T	T O	ORDER OF DESCRIPTORS: SOIL TYPE SYMBOL(S) - PRIMARY COMPONENT(S), (NATURE OF DEPOSIT), SECONDARY COMPONENTS, RELATIVE DENSITY/CONSISTENCY, GRAIN SIZE/PLASTICITY, GRADATION/STRUCTURE, COLOUR, MOISTURE CONTENT, SUPPLEMENTARY DESCRIPTORS NOTE: PLASTICITY DETERMINATION REQUIRES THE ADDITION OF MOISTURE IF THE SAMPLE IS TOO DRY TO ROLL (INDICATE IF MOISTURE WAS ADDED OR NOT).	6"	6"	6"	6"	N	R												
0		5"		asphalt																	
5"		2 1/2	silty sand moist to wet trace gravel, brown, fine to med																		
2 1/2		3 1/2	soft clay, silty, sandy, brown, wet																		
3 1/2		7	sand, fine, little silt, brown, moist/wet																		
7		8	silty clay, brown, wet, little sand																		
8		10	sand fine to med, little silt, moist to wet																		
10		11	brown/dark brown mottled clay, trace sand, little gravel, moist																		
11		15	silty clay, soft to med, grey moist																		
NOTES AND COMMENTS			DEPTH OF BOREHOLE CAVING _____		DEPTH OF FIRST GROUNDWATER ENCOUNTER _____		TOPSOIL THICKNESS _____														
			WATER LEVEL IN OPEN BOREHOLE ON COMPLETION _____		AFTER _____ HOURS _____																
			COMPLETION DETAILS: _____																		
			NOTE: FOR EACH SPLIT-SPOON SAMPLE, RECORD BLOW COUNTS, N-VALUE, SAMPLE RECOVERY LENGTH, AND SAMPLE INTERVAL		hydro punch screen 4'- set at 12'																
			NOTES:																		



STRATIGRAPHY LOG (OVERBURDEN)

PAGE B7115 OF

PROJECT NAME _____
 PROJECT NUMBER _____
 CLIENT _____
 LOCATION _____

DRILLING CONTRACTOR _____
 DRILLER _____
 SURFACE ELEVATION _____
 WEATHER (A.M.) _____
 (P.M.) _____

HOLE DESIGNATION _____
 DATE/TIME STARTED _____
 DATE/TIME COMPLETED _____
 DRILLING METHOD _____
 CRA SUPERVISOR _____

STRATIGRAPHIC INTERVALS (DEPTHS IN ft/m BGS)			SAMPLE DESCRIPTION	SAMPLE DETAILS										C H E M I C A L	A N A L Y S I S	G R A I N S I Z E
F R O M	A T	T O	ORDER OF DESCRIPTORS: SOIL TYPE SYMBOL(S) - PRIMARY COMPONENT(S), (NATURE OF DEPOSIT), SECONDARY COMPONENTS, RELATIVE DENSITY/CONSISTENCY, GRAIN SIZE/PLASTICITY, GRADATION/STRUCTURE, COLOUR, MOISTURE CONTENT, SUPPLEMENTARY DESCRIPTORS <small>NOTE: PLASTICITY DETERMINATION REQUIRES THE ADDITION OF MOISTURE IF THE SAMPLE IS TOO DRY TO ROLL (INDICATE IF MOISTURE WAS ADDED OR NOT).</small>	S A M P L E #	S A M P L E P E R T H I N O D E	PENETRATION RECORD SPLIT SPOON BLOWS (RECORD N-VALUES & RECOVERIES)						S A M P L E I N T E R V A L	P I D / F I D (ppm)			
						6"	8"	6"	8"	N	R					
0		5"	asphalt													
5"		11 1/2	silty clay, little sand, trace gravel, black streaks, dry													
11 1/2		3	brown sand, (silty, moist to dry, fine to med) rain													
3		9	silty clay, brown red silt, little sand, trace gravel, orange streaks													
7	6 1/2	7 1/2	sand brown, trace silt & gravel, fine to med, dry, wet													
7 1/2		9	clay / sand seams ≈ 6" thick, silty clay, little sand, wet, sand, fine silt, (fine gravel), wet													
9		12 1/2	brown/grey clay, silty, stiff, some sand & gravel													
12 1/2		15	grey clay, stiff, moist, trace silt & gravel													

DEPTH OF BOREHOLE CAVING _____ DEPTH OF FIRST GROUNDWATER BY COUNTER _____ TOPSOIL THICKNESS _____

WATER LEVEL IN OPEN BOREHOLE ON COMPLETION _____ AFTER _____ HOURS _____

COMPLETION DETAILS: _____

NOTE: FOR EACH SPLIT-SPOON SAMPLE, RECORD BLOW COUNTS, N-VALUE, SAMPLE RECOVERY LENGTH, AND SAMPLE INTERVAL.

NOTES: _____

NOTES AND COMMENTS: set MW (temp)
at 10' bgs



STRATIGRAPHY LOG (OVERBURDEN)

PAGE OF

BH116

PROJECT NAME _____
 PROJECT NUMBER _____
 CLIENT _____
 LOCATION _____

DRILLING CONTRACTOR _____
 DRILLER _____
 SURFACE ELEVATION _____
 WEATHER (A.M.) _____
 (P.M.) _____

HOLE DESIGNATION _____
 DATE/TIME STARTED _____
 DATE/TIME COMPLETED _____
 DRILLING METHOD _____
 CRA SUPERVISOR _____

STRATIGRAPHIC INTERVALS (DEPTHS IN ft/m BGS)			SAMPLE DESCRIPTION	SAMPLE DETAILS										C H E M I C A L	A N A L Y S I S	G R A I N S I Z E	
F R O M	A T	T O	ORDER OF DESCRIPTORS: SOIL TYPE SYMBOL(S) - PRIMARY COMPONENT(S), (NATURE OF DEPOSIT), SECONDARY COMPONENTS, RELATIVE DENSITY/CONSISTENCY, GRAIN SIZE/PLASTICITY, GRADATION/STRUCTURE, COLOUR, MOISTURE CONTENT, SUPPLEMENTARY DESCRIPTORS NOTE: PLASTICITY DETERMINATION REQUIRES THE ADDITION OF MOISTURE IF THE SAMPLE IS TOO DRY TO ROLL (INDICATE IF MOISTURE WAS ADDED OR NOT).	S A M P L E #	S A M P L E L I N E N O D E	PENETRATION RECORD SPLIT SPOON BLOWS (RECORD N-VALUES & RECOVERIES)						S A M P L E I N T E R V A L	P I D /				F I D (ppm)
						6"	6"	6"	6"	N	R						
0		5"	asphalt														
5"			brown/grey clay, little silt, trace gravel, clay, silt, trace sand														
3			little sand, more grey, less silt, trace fine gravel														
		7 1/2															
7 1/2			grey clay, trace sand/gravel, little silt, stiff, moist														
9		12	softer, more silt														
12		13	grey sand + gravel seam, moist to wet, fine to med trace silt														
13		20	grey clay, silt, soft, trace sand/gravel, moist														

DEPTH OF BOREHOLE CAVING _____ DEPTH OF FIRST GROUNDWATER ENCOUNTER _____ TOPSOIL THICKNESS _____
 WATER LEVEL IN OPEN BOREHOLE ON COMPLETION _____ AFTER _____ HOURS _____
 COMPLETION DETAILS: _____
 NOTE: FOR EACH SPLIT-SPOON SAMPLE, RECORD BLOW COUNTS, N-VALUE, SAMPLE RECOVERY LENGTH, AND SAMPLE INTERVAL
 NOTES: 12-13 - does not appear to be enough water bearing zone to sample



STRATIGRAPHY LOG (OVERBURDEN)

PROJECT NAME Coldwater Rd. RACER
 PROJECT NUMBER 12636-T12-01Y13
 CLIENT RACER
 LOCATION Flint, MI

DRILLING CONTRACTOR CRA Services
 DRILLER Ray Garcia
 SURFACE ELEVATION _____
 WEATHER _____

HOLE DESIGNATION BH-117
 DATE 10-22-13 0230
 DRILLING METHOD Geo-Probe
 CRA SUPERVISOR Eric Mickelson

STRATIGRAPHIC INTERVALS DEPTHS in ft/m BGS			SAMPLE DESCRIPTION	SAMPLE DETAILS							SAMPLE I.D.	ANALYTICAL SAMPLE DEPTH	SAMPLE TIME	
				S a m p l e #	S A M P L I N G M E T H O D	PENETRATION RECORD SPLIT SPOON BLOWS (RECORD N-VALUES AND RECOVERIES)								S A M P L E I N T E R V A L
6"	6"	6"	6"			N	R							
0		0.5	<u>Asphalt</u>								0-2.5	0.1		
0.5		2.5	<u>CL-Silty Clay - trace fine grained sand, firm, low plasticity, brown moist</u>	1	DP					90	2.5-5.0	0.2		
2.0											5.0-7.5	0.2		
2.5		3.6	<u>SM-Silty Sand - compact, fine grained, tan, moist</u>	2	DP					85	7.5-10	0.1		
3.6		10.6	<u>SP-Sand - few silt, compact, fine grained, tan to brownish-orange, moist</u>	3	DP					100	10-12.5	0.1		
	6.5		<u>wet</u>								12.5-15	0.2		
											15-17.5			
10.6		12.0	<u>ML-Silt - trace fine grained sand, compact, fine grained, moist</u>								17.5-20			
											20-22.5			
12.0		15.0	<u>CL-Clay - few silt stiff, low plasticity, gray, moist</u>								22.5-25			
	14.9		<u>fine sand seam (14.9'-15.0')</u>								25-27.5			
											27.5-30			
											30-32.5			
											32.5-35			
											35-37.5			
											37.5-40			
											40-42.5			
											42.5-45			
											45-47.5			
											47.5-50			

NOTE: FOR EACH SPLIT-SPOON SAMPLE, RECORD BLOW COUNTS, N-VALUE, SAMPLE RECOVERY LENGTH, AND SAMPLE INTERVAL

NOTES:

NOTES AND COMMENTS

STRATIGRAPHY LOG (OVERBURDEN)

PROJECT NAME Coldwater Rd.
 PROJECT NUMBER 12636-T12-01Y13
 CLIENT RACER
 LOCATION Flint, MI

DRILLING CONTRACTOR CRA Services
 DRILLER Roy Garza
 SURFACE ELEVATION _____
 WEATHER _____

HOLE DESIGNATION BH-118
 DATE 10-22-13
 DRILLING METHOD Geoprobe
 CRA SUPERVISOR Eric Mickelson

lines up with 113

STRATIGRAPHIC INTERVALS DEPTHS in ft/m BGS			SAMPLE DESCRIPTION	SAMPLE DETAILS											SAMPLE I.D.	ANALYTICAL SAMPLE DEPTH	SAMPLE TIME
				S a m p l e #	S A M P L I N G M E T H O D	PENETRATION RECORD SPLIT SPOON BLOWS (RECORD N-VALUES AND RECOVERIES)						S A M P L E I N T E R V A L	P I D / F I D (ppm)				
F R O M	A T	T O	6"			6"	6"	6"	N	R							
0		0.2	Vegetation	3									0-2.5	0.3			
0.2		1.7	ML-Silt - trace fine sand, compact, fine grained, greenish-brown, moist	1	DP							90	2.5-5.0	0.4			
0.2			ML-Silt										5.0-7.5	0.1			
1.7		3.2	CL-Silty Clay - trace fine grained sand, firm, low plasticity, brown, moist, occasional fine gravel	2	DP							90	7.5-10	0.1			
3.2													10-12.5	0.2			
3.2		5.0	SP-Sand - few silt, trace fine gravel, compact, fine grained, brown, moist	3	DP							100	12.5-15	0.3			
													15-17.5	0.1			
5.0		20.0	CL-Clay - few silt, trace fine sand, firm, low plasticity, light gray to light brown, moist	4	DP							100	17.5-20	0.0			
	8.9		soft, very moist, tree roots abundant (8.9'-9.7')										22.5-25				
	9.9		wet, fine sand (9.9'-10.0')										25-27.5				
	10.0		stiff, light brown (10.0'-10.1') moist										27.5-30				
	18.1		gray, stiff, moist (18.1'-20.0')										30-32.5				
													32.5-35				
													35-37.5				
													37.5-40				
													40-42.5				
													42.5-45				
													45-47.5				
													47.5-50				

NOTE: FOR EACH SPLIT-SPOON SAMPLE, RECORD BLOW COUNTS, N-VALUE, SAMPLE RECOVERY LENGTH, AND SAMPLE INTERVAL

NOTES AND COMMENTS

STRATIGRAPHY LOG (OVERBURDEN)

PROJECT NAME Coldwater Rd.
 PROJECT NUMBER 12636-T12-01413
 CLIENT RACER
 LOCATION Flint, MI

DRILLING CONTRACTOR CRA Services
 DRILLER Key Garza
 SURFACE ELEVATION
 WEATHER

HOLE DESIGNATION BH-119
 DATE 10-22-13
 DRILLING METHOD Geo Probe
 CRA SUPERVISOR Eric Mickelson

STRATIGRAPHIC INTERVALS DEPTHS in ft/m BGS			SAMPLE DESCRIPTION	SAMPLE DETAILS											SAMPLE I.D.	ANALYTICAL SAMPLE DEPTH	SAMPLE TIME
				S a m p l e #	S A M P L I N G M E T H O D	PENETRATION RECORD SPLIT SPOON BLOWS (RECORD N-VALUES AND RECOVERIES)						S A M P L E I N T E R V A L	P I D / I D	F I D			
6"	6"	6"	6"			N	R	(ppm)									
0	0.2		Vegetation											0-2.5	0.1		
0.2	0.5		ML-Silt - trace fine sand, compact, fine grained, brown, moist	1	DP							100		2.5-5.0	0.2		
														5.0-7.5	0.3		
1.5	20.0		CL-Silty Clay - trace fine sand, firm, low plasticity, brown to light gray, moist, occasional tree roots	2	DP							100		7.5-10	0.3		
														10-12.5	0.1		
	6.1		fine sand lense (0.01' thick), gray, wet	3	DP							100		12.5-15	0.0		
	14.0		gray, stiff (14.0'-20.0')	4	DP							100		15-17.5	0.1		
														17.5-20	0.2		
														20-22.5			
														22.5-25			
														25-27.5			
														27.5-30			
														30-32.5			
														32.5-35			
														35-37.5			
														37.5-40			
														40-42.5			
														42.5-45			
														45-47.5			
														47.5-50			

NOTE: FOR EACH SPLIT-SPOON SAMPLE, RECORD BLOW COUNTS, N-VALUE, SAMPLE RECOVERY LENGTH, AND SAMPLE INTERVAL

NOTES AND COMMENTS

STRATIGRAPHY LOG (OVERBURDEN)

PROJECT NAME Coldwater Rd.
 PROJECT NUMBER 12636-T12-01413
 CLIENT RACER
 LOCATION Flint, MI

DRILLING CONTRACTOR CRA Services
 DRILLER Key Gorza
 SURFACE ELEVATION _____
 WEATHER _____

HOLE DESIGNATION BH-120
 DATE 10-22-13
 DRILLING METHOD Geo Probe
 CRA SUPERVISOR Eric Mickelson

STRATIGRAPHIC INTERVALS			SAMPLE DESCRIPTION Order of Description: Soil Type Symbols(s) - Primary Components(s), (Nature Of Deposit), Secondary Components, Relative Density/Consistency, Grain Size/Plasticity, Gradation/Structure, Color, Moisture Content, Supplementary Descriptors	S a m p l e #	S A M P L I N G M E T H O D	SAMPLE DETAILS						S A M P L E I N T E R V A L S (ppm)	P I D / F I D	S A M P L E I D.	A N A L Y T I C A L S A M P L E D E P T H	S A M P L E T I M E
DEPTHS in ft/m BGS						PENETRATION RECORD SPLIT SPOON BLOWS (RECORD N-VALUES AND RECOVERIES)										
F R O M	A T	T O				6"	6"	6"	6"	N	R					
0		0.2	Vegetation								0-2.5	0.2				
0.2		1.7	SP-Sand - trace silt, compact, fine grained, brown, moist	1	DP					100	2.5-5.0	0.1				
1.7		15.0	CL-Silty Clay - trace fine sand, firm, low plasticity, brown, moist	2	DP					100	5.0-7.5	0.0				
	5.5		higher content of silt, very moist (5.5'-6.2')								10-12.5	0.1				
	6.8		stiff, occasional fine gravel (6.8'-15.0')	3	DP					100	12.5-15	0.0				
	10.0		gray, moderate plasticity (10.0'-15.0')								15-17.5					
											17.5-20					
											20-22.5					
											22.5-25					
											25-27.5					
											27.5-30					
											30-32.5					
											32.5-35					
											35-37.5					
											37.5-40					
											40-42.5					
											42.5-45					
											45-47.5					
											47.5-50					

NOTES AND COMMENTS

NOTE: FOR EACH SPLIT-SPOON SAMPLE, RECORD BLOW COUNTS, N-VALUE, SAMPLE RECOVERY LENGTH, AND SAMPLE INTERVAL

NOTES:

STRATIGRAPHY LOG (OVERBURDEN)

PROJECT NAME Coldwater Rd.
 PROJECT NUMBER 12636-T12-01413
 CLIENT RACER
 LOCATION Flint, MD

DRILLING CONTRACTOR CPA Services
 DRILLER Rey Garza
 SURFACE ELEVATION _____
 WEATHER _____

HOLE DESIGNATION BH-121
 DATE 10-22-13
 DRILLING METHOD Geo Probe
 CRA SUPERVISOR Eric Mickelson

STRATIGRAPHIC INTERVALS DEPTHS in ft/m BGS			SAMPLE DESCRIPTION	SAMPLE DETAILS											SAMPLE I.D.	ANALYTICAL SAMPLE DEPTH	SAMPLE TIME
				S a m p l e #	S A M P L I N G M E T H O D	PENETRATION RECORD SPLIT SPOON BLOWS (RECORD N-VALUES AND RECOVERIES)						S A M P L E I N T E R V A L	P I D / F I D D	(ppm)			
6"	6"	6"	6"			N	R										
0		0.2	Vegetation											0-2.5	0.3		
0.2		1.4	SP-Sand - trace silt, compact, fine grained, brown, moist	1	DP							100	2.5-5.0	0.7			
1.4		12.9	CL-Silty Clay - trace fine sand, firm, low plasticity, light brown, moist	2	DP							100	5.0-7.5	0.0			
		7.0	stiff, few silt (7.0' - 12.9')										7.5-10	0.0			
		8.7	gray (8.7' - 16.0')	3	DP							95	10-12.5	0.1			
12.9		20.0	SP-Sand - few silt, compact, fine grained, gray, wet										12.5-15	0.2			
		13.2	gray, silt seam (13.2' - 13.4')	4	DP							90	15-17.5	0.1			
		13.6	gray, silt seam (13.6' - 14.0')										17.5-20	0.0			
		14.1	gray, silt seam (14.1' - 14.2')										20-22.5				
		16.0	brown, trace silt, fine to medium grained, wet (16.0' - 20.0')										22.5-25				
													25-27.5				
													27.5-30				
													30-32.5				
													32.5-35				
													35-37.5				
													37.5-40				
													40-42.5				
													42.5-45				
													45-47.5				
													47.5-50				

NOTE: FOR EACH SPLIT-SPOON SAMPLE, RECORD BLOW COUNTS, N-VALUE, SAMPLE RECOVERY LENGTH, AND SAMPLE INTERVAL

NOTES AND COMMENTS

NOTES:

STRATIGRAPHY LOG (OVERBURDEN)

PROJECT NAME Coldwater Rd.
 PROJECT NUMBER 12636-T12-01713
 CLIENT RACER
 LOCATION Flint, MI

DRILLING CONTRACTOR CRA Services
 DRILLER Roy Garza
 SURFACE ELEVATION _____
 WEATHER _____

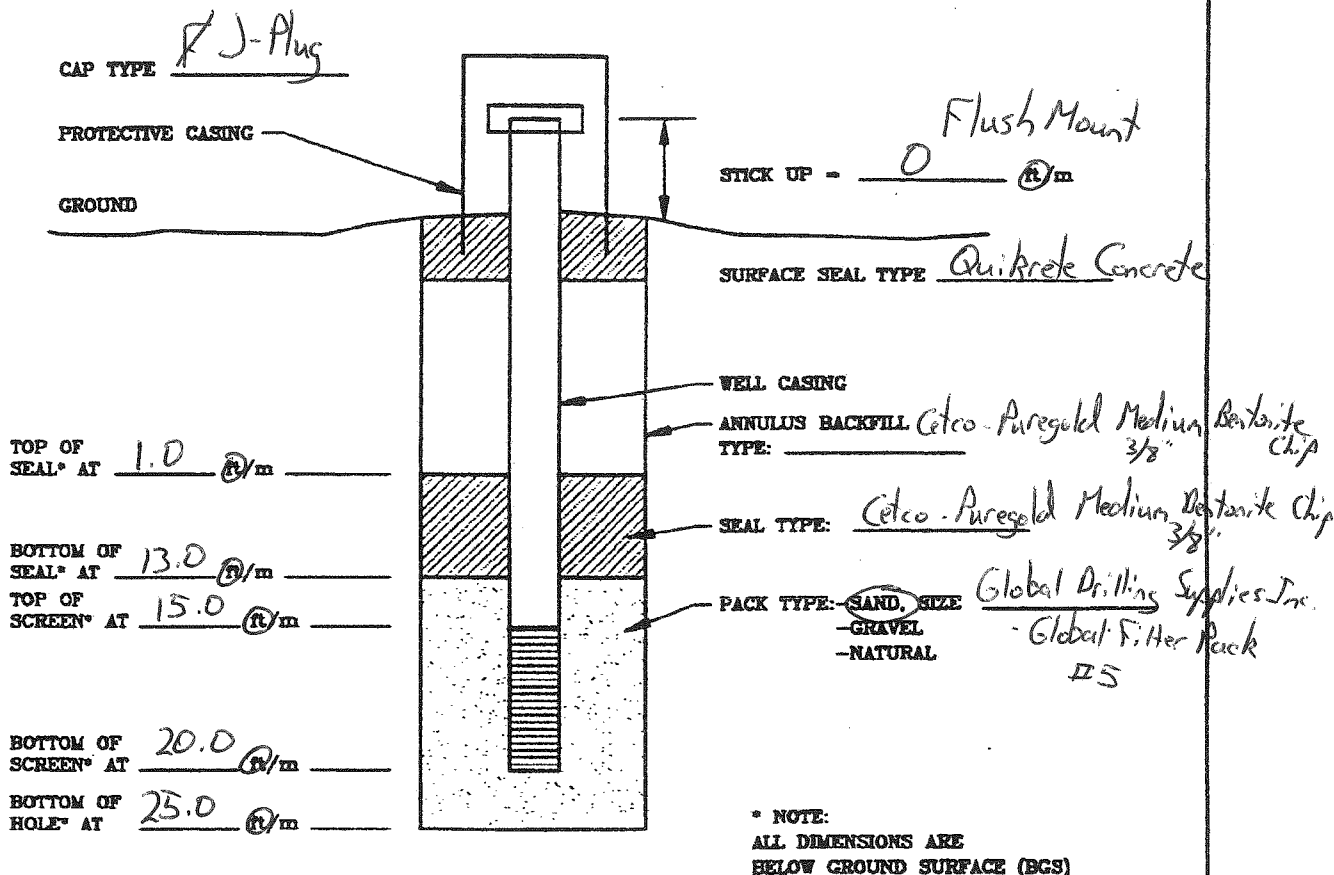
HOLE DESIGNATION MW-19-13
 DATE 10-22-13 0915
 DRILLING METHOD GeoProbe
 CRA SUPERVISOR Eric Mickelson

STRATIGRAPHIC INTERVALS			SAMPLE DESCRIPTION	SAMPLE DETAILS											SAMPLE I.D.	ANALYTICAL SAMPLE DEPTH	SAMPLE TIME
DEPTHS in ft/m BGS				Order of Description: Soil Type Symbols(s) - Primary Components(s), (Nature Of Deposit), Secondary Components, Relative Density/Consistency, Grain Size/Plasticity, Gradation/Structure, Color, Moisture Content, Supplementary Descriptors	S a m p l e #	S A M P L I N G M E T H O D	PENETRATION RECORD SPLIT SPOON BLOWS (RECORD N-VALUES AND RECOVERIES)						S A M P L E I N T E R V A L	P I D / F I D (ppm)			
F R O M	A T	T O					6"	6"	6"	6"	N	R					
0		0.5	Asphalt	1	DP							70	0-2.5	0.1			
0.5		4.4	CL-Silty Clay - trace fine grained sand, firm, low plasticity, brown, moist, occasional gravel	2	DP							70	2.5-5.0	0.2			
4.4		21.4	SP-Sand - few silt, compact, fine grained, light brown, moist										7.5-10	0.0			
	7.9		silt seam (0.02' thick)	3	DP							65	10-12.5	0.0			
	8.0		silt seam (0.02' thick)										12.5-15	0.3			
	9.1		clay seam (0.03' thick)	4	DP							50	15-17.5	0.2			
	9.6	13.5	clay seam (0.02' thick)										17.5-20	0.1			
	14.9		fine to medium grained (14.9' - 19.1'), wet	5	DP							40	20-22.5	0.1			
	19.1		silty clay, wet (19.1' - 19.4')										22.5-25	0.2			
	19.4		with fine gravel (19.4' - 20.0')										25-27.5				
	21.0		gray (21.0' - 21.4')										27.5-30				
21.4		25.0	CL-Clay - few silt, stiff, low plasticity, gray, moist										30-32.5				
													32.5-35				
													35-37.5				
													37.5-40				
													40-42.5				
													42.5-45				
													45-47.5				
													47.5-50				
NOTES AND COMMENTS			NOTE: FOR EACH SPLIT-SPOON SAMPLE, RECORD BLOW COUNTS, N-VALUE, SAMPLE RECOVERY LENGTH, AND SAMPLE INTERVAL														
			NOTES:														

OVERBURDEN INSTRUMENTATION LOG

PROJECT NAME Coldwater Rd. - RACER
 PROJECT NUMBER 12636-T12-01113
 CLIENT RAER Trust
 LOCATION Flint, MI

HOLE DESIGNATION MW-19-13
 DATE COMPLETED 10-22-13
 DRILLING METHOD HSA 4 1/4"
 CRA SUPERVISOR Eric Mickelson



SCREEN TYPE: continuous slot perforated louvre other: PVC

SCREEN MATERIAL: stainless steel plastic other: PVC

SCREEN LENGTH: 5.0 ft/m SCREEN DIAMETER: 2.0 in/cm SCREEN SLOT SIZE: 1/10 or .010

WELL CASING MATERIAL: PVC WELL CASING DIAMETER: 2.0 in/cm

HOLE DIAMETER: 8.5"

DEVELOPMENT: METHOD: _____ DURATION: _____

Attachment B



MEMORANDUM

TO: Mike Tomka REF. NO.: 012636

FROM: Nancy Bergstrom/tl/162/Det *et Fox* DATE: December 3, 2013

RE: **Analytical Results and Reduced Validation
Groundwater Monitoring
RACER - Peregrine Site
Genesee County, Michigan
October 2013**

1.0 Introduction

The following document details a reduced validation of analytical results for groundwater samples collected in support of the Groundwater Monitoring at the RACER Peregrine Site during October 2013. Samples were submitted to Test America Laboratories, Inc. , located in North Canton, Ohio. A sample collection and analysis summary is presented in Table 1. The validated analytical results are summarized in Table 2. A summary of the analytical methodology is presented in Table 3.

Standard Conestoga--Rovers & Associates (CRA) report deliverables were submitted by the laboratory. The final results and supporting quality assurance/quality control (QA/QC) data were assessed. Evaluation of the data was based on information obtained from the chain of custody form, finished report forms, method blank data, laboratory control samples (LCS), and field QC samples.

The QA/QC criteria by which these data have been assessed are outlined in the analytical methods referenced in Table 3 and applicable guidance from the documents entitled:

- i) "RCRA Facility Investigation (RFI) at Former Peregrin Inc. Coldwater Facility, Genesee Township, Michigan "QAPP", May 15, 2000
- ii) "USEPA Contract Laboratory Program National Functional Guidelines for Inorganic Data Review", "USEPA 540/R-94-013, February 1994

Item ii) will subsequently be referred to as the "Guidelines" in this Memorandum.

2.0 Sample Holding Time and Preservation

The sample holding time criteria and sample preservation requirements for the analyses are summarized in Table 3. Sample chain of custody documents and analytical reports were used to determine sample holding times. All samples were (prepared and) analyzed within the required holding times.

All samples were properly preserved, delivered on ice, and stored by the laboratory at the required temperature (4 +/- 2°C).

3.0 Laboratory Method Blank Analyses

Method blanks are prepared from a purified matrix and analyzed with investigative samples to determine the existence and magnitude of sample contamination introduced during the analytical procedures.

For this study, laboratory method blanks were analyzed at a minimum frequency of 1 per 20 investigative samples and/or 1 per analytical batch.

The method blank result was less than five times the investigative sample results, indicating that laboratory contamination was not a factor for this investigation.

4.0 Laboratory Control Sample Analyses

LCS are prepared and analyzed as samples to assess the analytical efficiencies of the methods employed, independent of sample matrix effects.

For this study, LCS were analyzed at a minimum frequency of 1 per 20 investigative samples and/or 1 per analytical batch.

The LCS contained all analytes of interest. LCS recoveries were assessed per the "Guidelines". All LCS recoveries were within the control limits, demonstrating acceptable analytical accuracy.

5.0 Field QA/QC Samples

The field QA/QC consisted of one field duplicate sample set.

Field Duplicate Sample Analysis

To assess the analytical and sampling protocol precision, one field duplicate sample was collected and submitted "blind" to the laboratory, as specified in Table 1. The RPDs associated with this duplicate sample must be less than 50 percent for water samples. If the reported concentration in either the investigative sample or its duplicate is less than five times the reporting limit (RL), the evaluation criteria is one times the RL value for water samples.

All field duplicate results were within acceptable agreement, demonstrating acceptable sampling and analytical precision.

6.0 Analyte Reporting

The laboratory reported detected results down to the laboratory's method detection limit (MDL) for each analyte. Positive analyte detections less than the RL but greater than the MDL were to be qualified as estimated (J) in Table 2. No positive analyte detections less than the PQL but greater than the MDL were reported.

7.0 Conclusion

Based on the assessment detailed in the foregoing, the data summarized in Table 2 are acceptable without qualification.

TABLE 1

**SAMPLE COLLECTION AND ANALYSIS SUMMARY
GROUNDWATER MONITORING
RACER - PEREGRINE SITE
GENESEE COUNTY, MICHIGAN
OCTOBER 2013**

<i>Sample Identification</i>	<i>Location</i>	<i>Matrix</i>	<i>Collection Date (mm/dd/yyyy)</i>	<i>Collection Time (hr:min)</i>	<u><i>Analysis/Parameters</i></u>		<i>Comments</i>
					<i>Total Manganese</i>	<i>Dissolved Manganese</i>	
GW-12636-102113-SSH-1301	BH-113	water	10/21/2013	15:05		X	
GW-12636-102113-SSH-1302	BH-114	water	10/21/2013	13:35		X	
GW-12636-102113-SSH-1303	BH-115	water	10/21/2013	13:04		X	
GW-12636-102213-SSH-1304	BH-117	water	10/22/2013	10:25	X	X	
GW-12636-102213-SSH-1305	BH-117	water	10/22/2013	10:30	X	X	Field duplicate of BH-117
GW-12636-102213-SSH-1306	BH-121	water	10/22/2013	16:30		X	

VALIDATED ANALYTICAL RESULTS SUMMARY
 GROUNDWATER MONITORING
 RACER - PEREGRINE SITE
 GENESEE COUNTY, MICHIGAN
 OCTOBER 2013

		BH-113	BH-114	BH-115
<i>Sample Location:</i>				
<i>Sample ID:</i>		GW-12636-102113-SSH-1301	GW-12636-102113-SSH-1302	GW-12636-102113-SSH-1303
<i>Sample Date:</i>		10/21/2013	10/21/2013	10/21/2013
	Units			
Manganese (total)	µg/L	--	--	--
Manganese (dissolved)	µg/L	1600	2700	900

**VALIDATED ANALYTICAL RESULTS SUMMARY
GROUNDWATER MONITORING
RACER - PEREGRINE SITE
GENESEE COUNTY, MICHIGAN
OCTOBER 2013**

		<i>BH-117</i>	<i>BH-117</i>	<i>BH-121</i>
<i>Sample Location:</i>				
<i>Sample ID:</i>		<i>GW-12636-102213-SSH-1304</i>	<i>GW-12636-102213-SSH-1305</i>	<i>GW-12636-102213-SSH-1306</i>
<i>Sample Date:</i>		<i>10/22/2013</i>	<i>10/22/2013</i>	<i>10/22/2013</i>
	<i>Units</i>			
Manganese (total)	µg/L	88	90	--
Manganese (dissolved)	µg/L	100	88	240

TABLE 3

ANALYTICAL METHODS AND HOLDING TIME CRITERIA
 GROUNDWATER MONITORING
 RACER - PEREGRINE SITE
 GENESEE COUNTY, MICHIGAN
 OCTOBER 2013

<i>Parameter</i>	<i>Method</i>	<i>Matrix</i>	<i>Preservation</i>	<i>Holding Time</i>	
				<i>Collection to Extraction (Days)</i>	<i>Collection or Extraction to Analysis (Days)</i>
Total and Dissolved Manganese	SW-846 6020	Water	water- pH < 2 and Iced, 4 ± 2° C	-	180

Notes:

SW-846 - "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods", SW-846, Third Edition, 1986, with subsequent revisions

TestAmerica

THE LEADER IN ENVIRONMENTAL TESTING

ANALYTICAL REPORT

TestAmerica Laboratories, Inc.

TestAmerica Canton

4101 Shuffel Street NW

North Canton, OH 44720

Tel: (330)497-9396

TestAmerica Job ID: 240-30497-1

Client Project/Site: 12636-T12-006, RACER Peregrine

For:

Conestoga-Rovers & Associates, Inc.

14496 Sheldon Road, Suite 200

Plymouth, Michigan 48170

Attn: Mr. Paul Wiseman



Authorized for release by:

10/28/2013 6:07:45 PM

Denise Heckler, Project Manager II

(330)966-9477

denise.heckler@testamericainc.com



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www.testamericainc.com

This report has been electronically signed and authorized by the signatory. Electronic signature is intended to be the legally binding equivalent of a traditionally handwritten signature.

Results relate only to the items tested and the sample(s) as received by the laboratory.

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Case Narrative

Client: Conestoga-Rovers & Associates, Inc.
Project/Site: 12636-T12-006, RACER Peregrine

TestAmerica Job ID: 240-30497-1

Job ID: 240-30497-1

Laboratory: TestAmerica Canton

Narrative

CASE NARRATIVE

Client: Conestoga-Rovers & Associates, Inc.

Project: 12636-T12-006, RACER Peregrine

Report Number: 240-30497-1

With the exceptions noted as flags or footnotes, standard analytical protocols were followed in the analysis of the samples and no problems were encountered or anomalies observed. In addition all laboratory quality control samples were within established control limits, with any exceptions noted below. Each sample was analyzed to achieve the lowest possible reporting limit within the constraints of the method. In some cases, due to interference or analytes present at high concentrations, samples were diluted. For diluted samples, the reporting limits are adjusted relative to the dilution required.

TestAmerica Canton attests to the validity of the laboratory data generated by TestAmerica facilities reported herein. All analyses performed by TestAmerica facilities were done using established laboratory SOPs that incorporate QA/QC procedures described in the application methods. TestAmerica's operations groups have reviewed the data for compliance with the laboratory QA/QC plan, and data have been found to be compliant with laboratory protocols unless otherwise noted below.

The test results in this report meet all NELAP requirements for parameters for which accreditation is required or available. Any exceptions to NELAP requirements are noted in this report. Pursuant to NELAP, this report may not be reproduced, except in full, without the written approval of the laboratory.

Calculations are performed before rounding to avoid round-off errors in calculated results.

All holding times were met and proper preservation noted for the methods performed on these samples, unless otherwise detailed in the individual sections below.

All solid sample results are reported on an "as received" basis unless otherwise indicated by the presence of a % solids value in the method header.

This laboratory report is confidential and is intended for the sole use of TestAmerica and its client.

RECEIPT

The samples were received on 10/23/2013; the samples arrived in good condition, properly preserved and on ice. The temperature of the coolers at receipt was 3.7 C.

DISSOLVED METALS (ICPMS)

Samples GW-12636-102113-SSH-1301 (240-30497-1), GW-12636-102113-SSH-1302 (240-30497-2), GW-12636-102113-SSH-1303 (240-30497-3), GW-12636-102113-SSH-1304 (240-30497-4), GW-12636-102113-SSH-1305 (240-30497-5) and GW-12636-102113-SSH-1306 (240-30497-6) were analyzed for dissolved metals (ICPMS) in accordance with EPA SW-846 Method 6020. The samples were prepared on 10/24/2013 and analyzed on 10/25/2013.

No difficulties were encountered during the metals analysis.

All quality control parameters were within the acceptance limits.

TOTAL RECOVERABLE METALS (ICPMS)

Samples GW-12636-102113-SSH-1304 (240-30497-4) and GW-12636-102113-SSH-1305 (240-30497-5) were analyzed for total recoverable metals (ICPMS) in accordance with EPA SW-846 Method 6020. The samples were prepared on 10/24/2013 and analyzed on 10/25/2013.

Case Narrative

Client: Conestoga-Rovers & Associates, Inc.
Project/Site: 12636-T12-006, RACER Peregrine

TestAmerica Job ID: 240-30497-1

Job ID: 240-30497-1 (Continued)

Laboratory: TestAmerica Canton (Continued)

Manganese was detected in method blank MB 240-106923/1-A at a level that was above the method detection limit but below the reporting limit. The value should be considered an estimate, and has been flagged. If the associated sample reported a result above the MDL and/or RL, the result has been flagged.

No other difficulties were encountered during the metals analysis.

All other quality control parameters were within the acceptance limits.

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Definitions/Glossary

Client: Conestoga-Rovers & Associates, Inc.
Project/Site: 12636-T12-006, RACER Peregrine

TestAmerica Job ID: 240-30497-1

Qualifiers

Metals

Qualifier	Qualifier Description
B	Compound was found in the blank and sample.
J	Result is less than the RL but greater than or equal to the MDL and the concentration is an approximate value.

Glossary

Abbreviation	These commonly used abbreviations may or may not be present in this report.
□	Listed under the "D" column to designate that the result is reported on a dry weight basis
%R	Percent Recovery
CNF	Contains no Free Liquid
DER	Duplicate error ratio (normalized absolute difference)
Dil Fac	Dilution Factor
DL, RA, RE, IN	Indicates a Dilution, Re-analysis, Re-extraction, or additional Initial metals/anion analysis of the sample
DLC	Decision level concentration
MDA	Minimum detectable activity
EDL	Estimated Detection Limit
MDC	Minimum detectable concentration
MDL	Method Detection Limit
ML	Minimum Level (Dioxin)
NC	Not Calculated
ND	Not detected at the reporting limit (or MDL or EDL if shown)
PQL	Practical Quantitation Limit
QC	Quality Control
RER	Relative error ratio
RL	Reporting Limit or Requested Limit (Radiochemistry)
RPD	Relative Percent Difference, a measure of the relative difference between two points
TEF	Toxicity Equivalent Factor (Dioxin)
TEQ	Toxicity Equivalent Quotient (Dioxin)

Sample Summary

Client: Conestoga-Rovers & Associates, Inc.
Project/Site: 12636-T12-006, RACER Peregrine

TestAmerica Job ID: 240-30497-1

Lab Sample ID	Client Sample ID	Matrix	Collected	Received
240-30497-1	GW-12636-102113-SSH-1301	Water	10/21/13 15:05	10/23/13 09:30
240-30497-2	GW-12636-102113-SSH-1302	Water	10/21/13 13:35	10/23/13 09:30
240-30497-3	GW-12636-102113-SSH-1303	Water	10/21/13 13:04	10/23/13 09:30
240-30497-4	GW-12636-102113-SSH-1304	Water	10/22/13 10:25	10/23/13 09:30
240-30497-5	GW-12636-102113-SSH-1305	Water	10/22/13 10:30	10/23/13 09:30
240-30497-6	GW-12636-102113-SSH-1306	Water	10/22/13 16:30	10/23/13 09:30

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Detection Summary

Client: Conestoga-Rovers & Associates, Inc.
 Project/Site: 12636-T12-006, RACER Peregrine

TestAmerica Job ID: 240-30497-1

Client Sample ID: GW-12636-102113-SSH-1301

Lab Sample ID: 240-30497-1

Analyte	Result	Qualifier	RL	MDL	Unit	Dil Fac	D	Method	Prep Type
Manganese	1600	B	5.0	0.41	ug/L	1		6020	Dissolved

Client Sample ID: GW-12636-102113-SSH-1302

Lab Sample ID: 240-30497-2

Analyte	Result	Qualifier	RL	MDL	Unit	Dil Fac	D	Method	Prep Type
Manganese	2700	B	5.0	0.41	ug/L	1		6020	Dissolved

Client Sample ID: GW-12636-102113-SSH-1303

Lab Sample ID: 240-30497-3

Analyte	Result	Qualifier	RL	MDL	Unit	Dil Fac	D	Method	Prep Type
Manganese	900	B	5.0	0.41	ug/L	1		6020	Dissolved

Client Sample ID: GW-12636-102113-SSH-1304

Lab Sample ID: 240-30497-4

Analyte	Result	Qualifier	RL	MDL	Unit	Dil Fac	D	Method	Prep Type
Manganese	88	B	5.0	0.41	ug/L	1		6020	Total
Manganese	100	B	5.0	0.41	ug/L	1		6020	Recoverable Dissolved

Client Sample ID: GW-12636-102113-SSH-1305

Lab Sample ID: 240-30497-5

Analyte	Result	Qualifier	RL	MDL	Unit	Dil Fac	D	Method	Prep Type
Manganese	90	B	5.0	0.41	ug/L	1		6020	Total
Manganese	88	B	5.0	0.41	ug/L	1		6020	Recoverable Dissolved

Client Sample ID: GW-12636-102113-SSH-1306

Lab Sample ID: 240-30497-6

Analyte	Result	Qualifier	RL	MDL	Unit	Dil Fac	D	Method	Prep Type
Manganese	240	B	5.0	0.41	ug/L	1		6020	Dissolved

This Detection Summary does not include radiochemical test results.

TestAmerica Canton

Method Summary

Client: Conestoga-Rovers & Associates, Inc.
Project/Site: 12636-T12-006, RACER Peregrine

TestAmerica Job ID: 240-30497-1

Method	Method Description	Protocol	Laboratory
6020	Metals (ICP/MS)	SW846	TAL CAN

Protocol References:

SW846 = "Test Methods For Evaluating Solid Waste, Physical/Chemical Methods", Third Edition, November 1986 And Its Updates.

Laboratory References:

TAL CAN = TestAmerica Canton, 4101 Shuffel Street NW, North Canton, OH 44720, TEL (330)497-9396



Client Sample Results

Client: Conestoga-Rovers & Associates, Inc.
Project/Site: 12636-T12-006, RACER Peregrine

TestAmerica Job ID: 240-30497-1

Method: 6020 - Metals (ICP/MS) - Total Recoverable

Client Sample ID: GW-12636-102113-SSH-1304

Lab Sample ID: 240-30497-4

Date Collected: 10/22/13 10:25

Matrix: Water

Date Received: 10/23/13 09:30

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Manganese	88	B	5.0	0.41	ug/L		10/24/13 09:27	10/25/13 16:10	1

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Client Sample Results

Client: Conestoga-Rovers & Associates, Inc.
Project/Site: 12636-T12-006, RACER Peregrine

TestAmerica Job ID: 240-30497-1

Method: 6020 - Metals (ICP/MS) - Total Recoverable

Client Sample ID: GW-12636-102113-SSH-1305

Lab Sample ID: 240-30497-5

Date Collected: 10/22/13 10:30

Matrix: Water

Date Received: 10/23/13 09:30

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Manganese	90	B	5.0	0.41	ug/L		10/24/13 09:27	10/25/13 16:18	1

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Client Sample Results

Client: Conestoga-Rovers & Associates, Inc.
Project/Site: 12636-T12-006, RACER Peregrine

TestAmerica Job ID: 240-30497-1

Method: 6020 - Metals (ICP/MS) - Dissolved

Client Sample ID: GW-12636-102113-SSH-1301

Lab Sample ID: 240-30497-1

Date Collected: 10/21/13 15:05

Matrix: Water

Date Received: 10/23/13 09:30

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Manganese	1600	B	5.0	0.41	ug/L		10/24/13 09:27	10/25/13 15:59	1

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Client Sample Results

Client: Conestoga-Rovers & Associates, Inc.
Project/Site: 12636-T12-006, RACER Peregrine

TestAmerica Job ID: 240-30497-1

Method: 6020 - Metals (ICP/MS) - Dissolved

Client Sample ID: GW-12636-102113-SSH-1302

Lab Sample ID: 240-30497-2

Date Collected: 10/21/13 13:35

Matrix: Water

Date Received: 10/23/13 09:30

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Manganese	2700	B	5.0	0.41	ug/L		10/24/13 09:27	10/25/13 16:02	1

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Client Sample Results

Client: Conestoga-Rovers & Associates, Inc.
Project/Site: 12636-T12-006, RACER Peregrine

TestAmerica Job ID: 240-30497-1

Method: 6020 - Metals (ICP/MS) - Dissolved

Client Sample ID: GW-12636-102113-SSH-1303

Lab Sample ID: 240-30497-3

Date Collected: 10/21/13 13:04

Matrix: Water

Date Received: 10/23/13 09:30

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Manganese	900	B	5.0	0.41	ug/L		10/24/13 09:27	10/25/13 16:06	1

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Client Sample Results

Client: Conestoga-Rovers & Associates, Inc.
Project/Site: 12636-T12-006, RACER Peregrine

TestAmerica Job ID: 240-30497-1

Method: 6020 - Metals (ICP/MS) - Dissolved

Client Sample ID: GW-12636-102113-SSH-1304

Lab Sample ID: 240-30497-4

Date Collected: 10/22/13 10:25

Matrix: Water

Date Received: 10/23/13 09:30

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Manganese	100	B	5.0	0.41	ug/L		10/24/13 09:27	10/25/13 16:14	1

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Client Sample Results

Client: Conestoga-Rovers & Associates, Inc.
Project/Site: 12636-T12-006, RACER Peregrine

TestAmerica Job ID: 240-30497-1

Method: 6020 - Metals (ICP/MS) - Dissolved

Client Sample ID: GW-12636-102113-SSH-1305

Lab Sample ID: 240-30497-5

Date Collected: 10/22/13 10:30

Matrix: Water

Date Received: 10/23/13 09:30

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Manganese	88	B	5.0	0.41	ug/L		10/24/13 09:27	10/25/13 16:22	1

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Client Sample Results

Client: Conestoga-Rovers & Associates, Inc.
Project/Site: 12636-T12-006, RACER Peregrine

TestAmerica Job ID: 240-30497-1

Method: 6020 - Metals (ICP/MS) - Dissolved

Client Sample ID: GW-12636-102113-SSH-1306

Lab Sample ID: 240-30497-6

Date Collected: 10/22/13 16:30

Matrix: Water

Date Received: 10/23/13 09:30

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Manganese	240	B	5.0	0.41	ug/L		10/24/13 09:27	10/25/13 16:26	1

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QC Association Summary

Client: Conestoga-Rovers & Associates, Inc.
 Project/Site: 12636-T12-006, RACER Peregrine

TestAmerica Job ID: 240-30497-1

Metals

Prep Batch: 106923

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
240-30497-1	GW-12636-102113-SSH-1301	Dissolved	Water	3005A	
240-30497-2	GW-12636-102113-SSH-1302	Dissolved	Water	3005A	
240-30497-3	GW-12636-102113-SSH-1303	Dissolved	Water	3005A	
240-30497-4	GW-12636-102113-SSH-1304	Dissolved	Water	3005A	
240-30497-4	GW-12636-102113-SSH-1304	Total Recoverable	Water	3005A	
240-30497-5	GW-12636-102113-SSH-1305	Dissolved	Water	3005A	
240-30497-5	GW-12636-102113-SSH-1305	Total Recoverable	Water	3005A	
240-30497-6	GW-12636-102113-SSH-1306	Dissolved	Water	3005A	
LCS 240-106923/2-A	Lab Control Sample	Total Recoverable	Water	3005A	
MB 240-106923/1-A	Method Blank	Total Recoverable	Water	3005A	

Analysis Batch: 107335

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
240-30497-1	GW-12636-102113-SSH-1301	Dissolved	Water	6020	106923
240-30497-2	GW-12636-102113-SSH-1302	Dissolved	Water	6020	106923
240-30497-3	GW-12636-102113-SSH-1303	Dissolved	Water	6020	106923
240-30497-4	GW-12636-102113-SSH-1304	Dissolved	Water	6020	106923
240-30497-4	GW-12636-102113-SSH-1304	Total Recoverable	Water	6020	106923
240-30497-5	GW-12636-102113-SSH-1305	Dissolved	Water	6020	106923
240-30497-5	GW-12636-102113-SSH-1305	Total Recoverable	Water	6020	106923
240-30497-6	GW-12636-102113-SSH-1306	Dissolved	Water	6020	106923
LCS 240-106923/2-A	Lab Control Sample	Total Recoverable	Water	6020	106923
MB 240-106923/1-A	Method Blank	Total Recoverable	Water	6020	106923

QC Sample Results

Client: Conestoga-Rovers & Associates, Inc.
 Project/Site: 12636-T12-006, RACER Peregrine

TestAmerica Job ID: 240-30497-1

Method: 6020 - Metals (ICP/MS)

Lab Sample ID: MB 240-106923/1-A
 Matrix: Water
 Analysis Batch: 107335

Client Sample ID: Method Blank
 Prep Type: Total Recoverable
 Prep Batch: 106923

Analyte	MB Result	MB Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Manganese	0.604	J	5.0	0.41	ug/L		10/24/13 09:27	10/25/13 15:27	1

Lab Sample ID: LCS 240-106923/2-A
 Matrix: Water
 Analysis Batch: 107335

Client Sample ID: Lab Control Sample
 Prep Type: Total Recoverable
 Prep Batch: 106923

Analyte	Spike Added	LCS Result	LCS Qualifier	Unit	D	%Rec	%Rec. Limits
Manganese	1000	1090		ug/L		109	80 - 120



Lab Chronicle

Client: Conestoga-Rovers & Associates, Inc.
 Project/Site: 12636-T12-006, RACER Peregrine

TestAmerica Job ID: 240-30497-1

Client Sample ID: GW-12636-102113-SSH-1301

Lab Sample ID: 240-30497-1

Date Collected: 10/21/13 15:05

Matrix: Water

Date Received: 10/23/13 09:30

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Prepared or Analyzed	Analyst	Lab
Dissolved	Prep	3005A			106923	10/24/13 09:27	ADS	TAL CAN
Dissolved	Analysis	6020		1	107335	10/25/13 15:59	RKT	TAL CAN

Client Sample ID: GW-12636-102113-SSH-1302

Lab Sample ID: 240-30497-2

Date Collected: 10/21/13 13:35

Matrix: Water

Date Received: 10/23/13 09:30

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Prepared or Analyzed	Analyst	Lab
Dissolved	Prep	3005A			106923	10/24/13 09:27	ADS	TAL CAN
Dissolved	Analysis	6020		1	107335	10/25/13 16:02	RKT	TAL CAN

Client Sample ID: GW-12636-102113-SSH-1303

Lab Sample ID: 240-30497-3

Date Collected: 10/21/13 13:04

Matrix: Water

Date Received: 10/23/13 09:30

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Prepared or Analyzed	Analyst	Lab
Dissolved	Prep	3005A			106923	10/24/13 09:27	ADS	TAL CAN
Dissolved	Analysis	6020		1	107335	10/25/13 16:06	RKT	TAL CAN

Client Sample ID: GW-12636-102113-SSH-1304

Lab Sample ID: 240-30497-4

Date Collected: 10/22/13 10:25

Matrix: Water

Date Received: 10/23/13 09:30

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Prepared or Analyzed	Analyst	Lab
Total Recoverable	Prep	3005A			106923	10/24/13 09:27	ADS	TAL CAN
Total Recoverable	Analysis	6020		1	107335	10/25/13 16:10	RKT	TAL CAN
Dissolved	Prep	3005A			106923	10/24/13 09:27	ADS	TAL CAN
Dissolved	Analysis	6020		1	107335	10/25/13 16:14	RKT	TAL CAN

Client Sample ID: GW-12636-102113-SSH-1305

Lab Sample ID: 240-30497-5

Date Collected: 10/22/13 10:30

Matrix: Water

Date Received: 10/23/13 09:30

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Prepared or Analyzed	Analyst	Lab
Total Recoverable	Prep	3005A			106923	10/24/13 09:27	ADS	TAL CAN
Total Recoverable	Analysis	6020		1	107335	10/25/13 16:18	RKT	TAL CAN
Dissolved	Prep	3005A			106923	10/24/13 09:27	ADS	TAL CAN
Dissolved	Analysis	6020		1	107335	10/25/13 16:22	RKT	TAL CAN

Lab Chronicle

Client: Conestoga-Rovers & Associates, Inc.
Project/Site: 12636-T12-006, RACER Peregrine

TestAmerica Job ID: 240-30497-1

Client Sample ID: GW-12636-102113-SSH-1306

Lab Sample ID: 240-30497-6

Date Collected: 10/22/13 16:30

Matrix: Water

Date Received: 10/23/13 09:30

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Prepared or Analyzed	Analyst	Lab
Dissolved	Prep	3005A			106923	10/24/13 09:27	ADS	TAL CAN
Dissolved	Analysis	6020		1	107335	10/25/13 16:26	RKT	TAL CAN

Laboratory References:

TAL CAN = TestAmerica Canton, 4101 Shuffel Street NW, North Canton, OH 44720, TEL (330)497-9396



Certification Summary

Client: Conestoga-Rovers & Associates, Inc.
Project/Site: 12636-T12-006, RACER Peregrine

TestAmerica Job ID: 240-30497-1

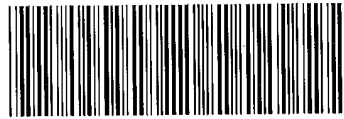
Laboratory: TestAmerica Canton

All certifications held by this laboratory are listed. Not all certifications are applicable to this report.

Authority	Program	EPA Region	Certification ID	Expiration Date
California	NELAP	9	01144CA	06-30-14
Connecticut	State Program	1	PH-0590	12-31-13
Florida	NELAP	4	E87225	06-30-14
Georgia	State Program	4	N/A	06-30-14
Illinois	NELAP	5	200004	07-31-14 *
Kansas	NELAP	7	E-10336	01-31-14
Kentucky	State Program	4	58	06-30-14
L-A-B	DoD ELAP		L2315	07-18-16
Nevada	State Program	9	OH-000482008A	07-31-14
New Jersey	NELAP	2	OH001	06-30-14
New York	NELAP	2	10975	04-01-14
Ohio VAP	State Program	5	CL0024	01-19-14
Pennsylvania	NELAP	3	68-00340	08-31-14 *
Texas	NELAP	6		08-31-14 *
USDA	Federal		P330-11-00328	08-26-14
Virginia	NELAP	3	460175	09-14-14
Washington	State Program	10	C971	01-12-14
Wisconsin	State Program	5	999518190	08-31-14

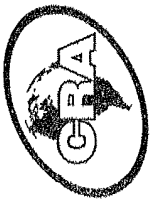
* Expired certification is currently pending renewal and is considered valid.

**CHAIN OF CUSTODY
AND
RECEIVING DOCUMENTS**



240-30497 Chain of Custody





CONESTOGA-ROVERS & ASSOCIATES

CHAIN OF CUSTODY RECORD

14496 Sheldon Road, Suite #200, Plymouth, Michigan 48170
Phone: (734) 453-5123 Fax: (734) 453-5201

COC NO.: **PL-11809**
PAGE **7** OF **7**
(See Reverse Side for Instructions)

3-7

Project No/Phase/Task Code: 17636		Laboratory Name: TestAmerica		Lab Location: North Canton OH		SSOW ID: 12636-T12-006	
Project Name: Roev Goldwater Rd		Lab Contact: D. Heiler		Lab Quote No: 1		Carrier: FedEx	
Project Location: Genesse Twp., MI		SAMPLE TYPE		ANALYSIS REQUESTED (See Back of COC for Definitions)			
Chemistry Contact: P. Wiseman		Matrix Code		Total Containers/Sample			
Sampler(s): S. Howmeyer		(see back of COC)		Other:			
SAMPLE IDENTIFICATION (Containers for each sample may be combined on one line)		DATE (mm/dd/yyyy)		TIME (hh:mm)		MS/MSD Request	
1 GW-12636-102113-SSH-1301		10/21/13		1505		WB G	
2 GW-12636-102113-SSH-1302		10/21/13		1335		WB G	
3 GW-12636-102113-SSH-1303		10/21/13		1304		WB G	
4 GW-12636-102213-SSH-1304		10/22/13		1025		WB G	
5 GW-12636-102213-SSH-1305		10/22/13		1030		WB G	
6 GW-12636-102213-SSH-1306		10/22/13		1130		WB G	
7							
8							
9							
10							
11							
12							
13							
14							
15							
TAT Required in business days (use separate COCs for different TATs):		DATE		TIME		DATE	
<input type="checkbox"/> 1 Day <input type="checkbox"/> 2 Days <input type="checkbox"/> 3 Days <input type="checkbox"/> 1 Week <input checked="" type="checkbox"/> 2 Week <input type="checkbox"/> Other:		CRA		10/22/13		1700	
RECEIVED BY: <i>[Signature]</i>		COMPANY		RECEIVED BY: <i>[Signature]</i>		COMPANY	
1. <i>[Signature]</i>		CRA		10/22/13		T.A.	
2.						10/23/13	
3.						930	
Notes/ Special Requirements:		Total Number of Containers:		All Samples in Cooler must be on COC		Notes/ Special Requirements:	

TestAmerica Canton Sample Receipt Form/Narrative
Canton Facility

Login # : 30497

Client CRA Site Name

Cooler unpacked by:

Cooler Received on 10-23-13 Opened on 10-23-13

FedEx: 1st Grd UPS FAS Stetson Client Drop Off TestAmerica Courier Other

TestAmerica Cooler # 260-215 Foam Box Client Cooler Box Other

Packing material used: Bubble Wrap Foam Plastic Bag None Other

COOLANT: Wet Ice Blue Ice Dry Ice Water None

- Cooler temperature upon receipt

IR GUN# A (CF +2 °C)	Observed Cooler Temp. _____ °C	Corrected Cooler Temp. _____ °C	
IR GUN# 4 (CF +1 °C)	Observed Cooler Temp. _____ °C	Corrected Cooler Temp. _____ °C	<input type="checkbox"/> See Multiple Cooler Form Corrected
IR GUN# 5 (CF +2 °C)	Observed Cooler Temp. _____ °C	Corrected Cooler Temp. _____ °C	
IR GUN# 8 (CF -0 °C)	Observed Cooler Temp. 3.7	Observed Cooler Temp. 3.7 °C	
- Were custody seals on the outside of the cooler(s)? If Yes Quantity _____ Yes No
 - Were custody seals on the outside of the cooler(s) signed & dated? Yes No NA
 - Were custody seals on the bottle(s)? Yes No
- Shippers' packing slip attached to the cooler(s)? Yes No
- Did custody papers accompany the sample(s)? Yes No
- Were the custody papers relinquished & signed in the appropriate place? Yes No
- Did all bottles arrive in good condition (Unbroken)? Yes No
- Could all bottle labels be reconciled with the COC? Yes No
- Were correct bottle(s) used for the test(s) indicated? Yes No
- Sufficient quantity received to perform indicated analyses? Yes No
- Were sample(s) at the correct pH upon receipt? Yes No NA pH Strip Lot# HC385663
- Were VOAs on the COC? Yes No
- Were air bubbles >6 mm in any VOA vials? Yes No NA
- Was a trip blank present in the cooler(s)? Yes No

Contacted PM _____ Date _____ by _____ via Verbal Voice Mail Other
Concerning _____

14. CHAIN OF CUSTODY & SAMPLE DISCREPANCIES

Samples processed by:

Blank lines for Chain of Custody and Sample Discrepancies.

15. SAMPLE CONDITION

Sample(s) _____ were received after the recommended holding time had expired.
Sample(s) _____ were received in a broken container.
Sample(s) _____ were received with bubble >6 mm in diameter. (Notify PM)

16. SAMPLE PRESERVATION

Sample(s) _____ were further preserved in the laboratory.
Time preserved: _____ Preservative(s) added/Lot number(s): _____

Temperature readings: _____

<u>Client Sample ID</u>	<u>Lab ID</u>	<u>Container Type</u>	<u>Container pH</u>	<u>Preservative Added (mls)</u>	<u>Lot #</u>
GW-12636-102113-SSH-1301	240-30497-A-1	Plastic 500ml - w/ Nitric - Dis.	<2	_____	_____
GW-12636-102113-SSH-1302	240-30497-A-2	Plastic 500ml - w/ Nitric - Dis.	<2	_____	_____
GW-12636-102113-SSH-1303	240-30497-A-3	Plastic 500ml - w/ Nitric - Dis.	<2	_____	_____
GW-12636-102113-SSH-1304	240-30497-A-4	Plastic 500ml - with Nitric Acid	<2	_____	_____
GW-12636-102113-SSH-1304	240-30497-B-4	Plastic 500ml - w/ Nitric - Dis.	<2	_____	_____
GW-12636-102113-SSH-1305	240-30497-A-5	Plastic 500ml - with Nitric Acid	<2	_____	_____
GW-12636-102113-SSH-1305	240-30497-B-5	Plastic 500ml - w/ Nitric - Dis.	<2	_____	_____
GW-12636-102113-SSH-1306	240-30497-A-6	Plastic 500ml - w/ Nitric - Dis.	<2	_____	_____



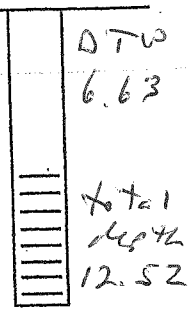
Attachment C

MONITORING WELL RECORD FOR LOW-FLOW PURGING

Project Data:

Project Name: _____
 Ref. No.: 12636

Date: 10/21/13
 Personnel: SSH



Monitoring Well Data:

Well No.: BH 113
 Vapour PID (ppm): _____
 Measurement Point: _____
 Constructed Well Depth (m/ft): _____
 Measured Well Depth (m/ft): _____
 Depth of Sediment (m/ft): _____

Saturated Screen Length (m/ft): _____
 Depth to Pump Intake (m/ft)⁽¹⁾: _____
 Well Diameter, D (cm/in): _____
 Well Screen Volume, V_s (L)⁽²⁾: _____
 Initial Depth to Water (m/ft): 6.63

Time	Pumping Rate (mL/min)	Depth to Water (m/ft)	Drawdown from Initial Water Level ⁽³⁾ (m/ft)	Temperature °C	Conductivity (mS/cm)	Turbidity NTU	DO (mg/L)	pH	ORP (mV)	Volume Purged, V _p (L)	No. of Well Screen Volumes Purged ⁽⁴⁾
1145		6.63									
1340	50/1.00										
1415						242				1.75 gal/s	
1430						141				2.5	
1455						64.6				3.5	
1500				17.60	4.30		1.83	8.01	-6		
1505	sample					86.8					

Notes:

- (1) The pump intake will be placed at the well screen mid-point or at a minimum of 0.6 m (2 ft) above any sediment accumulated at the well bottom.
- (2) The well screen volume will be based on a 1.52 metres (5-foot) screen length (L). For metric units, $V_s = \pi \cdot (r^2) \cdot L$ in mL, where r (r=D/2) and L are in cm. For Imperial units, $V_s = \pi \cdot (r^2) \cdot L \cdot (2.54)^3$, where r and L are in inches
- (3) The drawdown from the initial water level should not exceed 0.1 m (0.3 ft). The pumping rate should not exceed 600 mL/min.
- (4) Purging will continue until stabilization is achieved or until 20 well screen volumes have been purged (unless purge water remains visually turbid and appears to be clearing, or unless stabilization parameters are varying slightly outside of the stabilization criteria and appear to be stabilizing), No. of Well Screen Volumes Purged = V_p / V_s .
- (5) For conductivity, the average value of three readings < 1 mS/cm ± 0.005 mS/cm or where conductivity > 1 mS/cm ± 0.01 mS/cm.

well set 10' bgs ≈ 1115 ^{time}

MONITORING WELL RECORD FOR LOW-FLOW PURGING

Project Data:

Project Name: _____
 Ref. No.: 12636

Date: 10/21/13
 Personnel: SSH

Monitoring Well Data:

Well No.: BH115

Vapour PID (ppm): _____

Measurement Point: _____

Constructed Well Depth (m/ft): _____

Measured Well Depth (m/ft): _____

Depth of Sediment (m/ft): _____

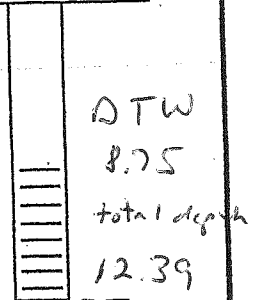
Saturated Screen Length (m/ft): _____

Depth to Pump Intake (m/ft)⁽¹⁾: _____

Well Diameter, D (cm/in): _____

Well Screen Volume, V_s (L)⁽²⁾: _____

Initial Depth to Water (m/ft): 8.75



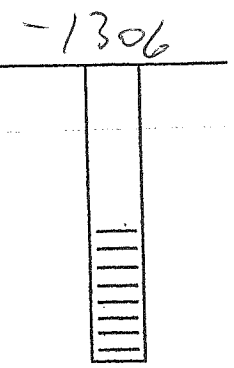
Time	Pumping Rate (mL/min)	Depth to Water (m/ft)	Drawdown from Initial Water Level ⁽³⁾ (m/ft)	Temperature °C	Conductivity (mS/cm)	Turbidity NTU	DO (mg/L)	pH	ORP (mV)	Volume Purged, V _p (L)	No. of Well Screen Volumes Purged ⁽⁴⁾
			Precision Required ⁽⁵⁾ :	±3%	±0.005 or 0.01 ⁽⁵⁾	±10%	±10%	±0.1 Units	±10 mV		
1510		8.75									
1513	50/100 mls										
1530						79.7				1591	
1545				16.69	5.87	62.1	1.67	8.05	-16	1.25 gals	
1550	sample										
1555						15.8					

Notes:

- The pump intake will be placed at the well screen mid-point or at a minimum of 0.6 m (2 ft) above any sediment accumulated at the well bottom.
- The well screen volume will be based on a 1.52 metres (5-foot) screen length (L). For metric units, $V_s = \pi \cdot (r^2) \cdot L$ in mL, where r (r=D/2) and L are in cm. For Imperial units, $V_s = \pi \cdot (r^2) \cdot L \cdot (2.54)^3$, where r and L are in inches
- The drawdown from the initial water level should not exceed 0.1 m (0.3 ft). The pumping rate should not exceed 600 mL/min.
- Purging will continue until stabilization is achieved or until 20 well screen volumes have been purged (unless purge water remains visually turbid and appears to be clearing, or unless stabilization parameters are varying slightly outside of the stabilization criteria and appear to be stabilizing), No. of Well Screen Volumes Purged = V_p/V_s .
- For conductivity, the average value of three readings < 1 mS/cm ±0.005 mS/cm or where conductivity > 1 mS/cm ±0.01 mS/cm.

temp. well set 10' bgs
 sample field filtered
 Diss. Manganese

MONITORING WELL RECORD FOR LOW-FLOW PURGING



Project Data:

Project Name: Coldwater PA
 Ref. No.: 12636

Date: 10/22/13
 Personnel: SSH

Monitoring Well Data:

Well No.: BH121
 Vapour PID (ppm): _____
 Measurement Point: _____
 Constructed Well Depth (m/ft): _____
 Measured Well Depth (m/ft): _____
 Depth of Sediment (m/ft): _____

Saturated Screen Length (m/ft): _____
 Depth to Pump Intake (m/ft)⁽¹⁾: _____
 Well Diameter, D (cm/in): _____
 Well Screen Volume, V_s (L)⁽²⁾: _____
 Initial Depth to Water (m/ft): 12.57

Time	Pumping Rate (mL/min)	Depth to Water (m/ft)	Drawdown from Initial Water Level ⁽³⁾ (m/ft)	Temperature °C	Conductivity (mS/cm)	Turbidity NTU	DO (mg/L)	pH	ORP (mV)	Volume Purged, V _p (L)	No. of Well Screen Volumes Purged ⁽⁴⁾

1600	50-100	12.57								1 pint - went dry	
1615						643				1 pint - went dry	
1630	sample					271					
1705	after sampling					59.5					

Notes:

- The pump intake will be placed at the well screen mid-point or at a minimum of 0.6 m (2 ft) above any sediment accumulated at the well bottom.
- The well screen volume will be based on a 1.52 metres (5-foot) screen length (L). For metric units, $V_s = \pi \cdot (r^2) \cdot L$ in mL, where r (r=D/2) and L are in cm. For Imperial units, $V_s = \pi \cdot (r^2) \cdot L \cdot (2.54)^3$, where r and L are in inches
- The drawdown from the initial water level should not exceed 0.1 m (0.3 ft). The pumping rate should not exceed 600 mL/min.
- Purging will continue until stabilization is achieved or until 20 well screen volumes have been purged (unless purge water remains visually turbid and appears to be clearing, or unless stabilization parameters are varying slightly outside of the stabilization criteria and appear to be stabilizing), No. of Well Screen Volumes Purged = V_p / V_s .
- For conductivity, the average value of three readings < 1 mS/cm ±0.005 mS/cm or where conductivity > 1 mS/cm ±0.01 mS/cm.

DTB 15.01

Attachment D

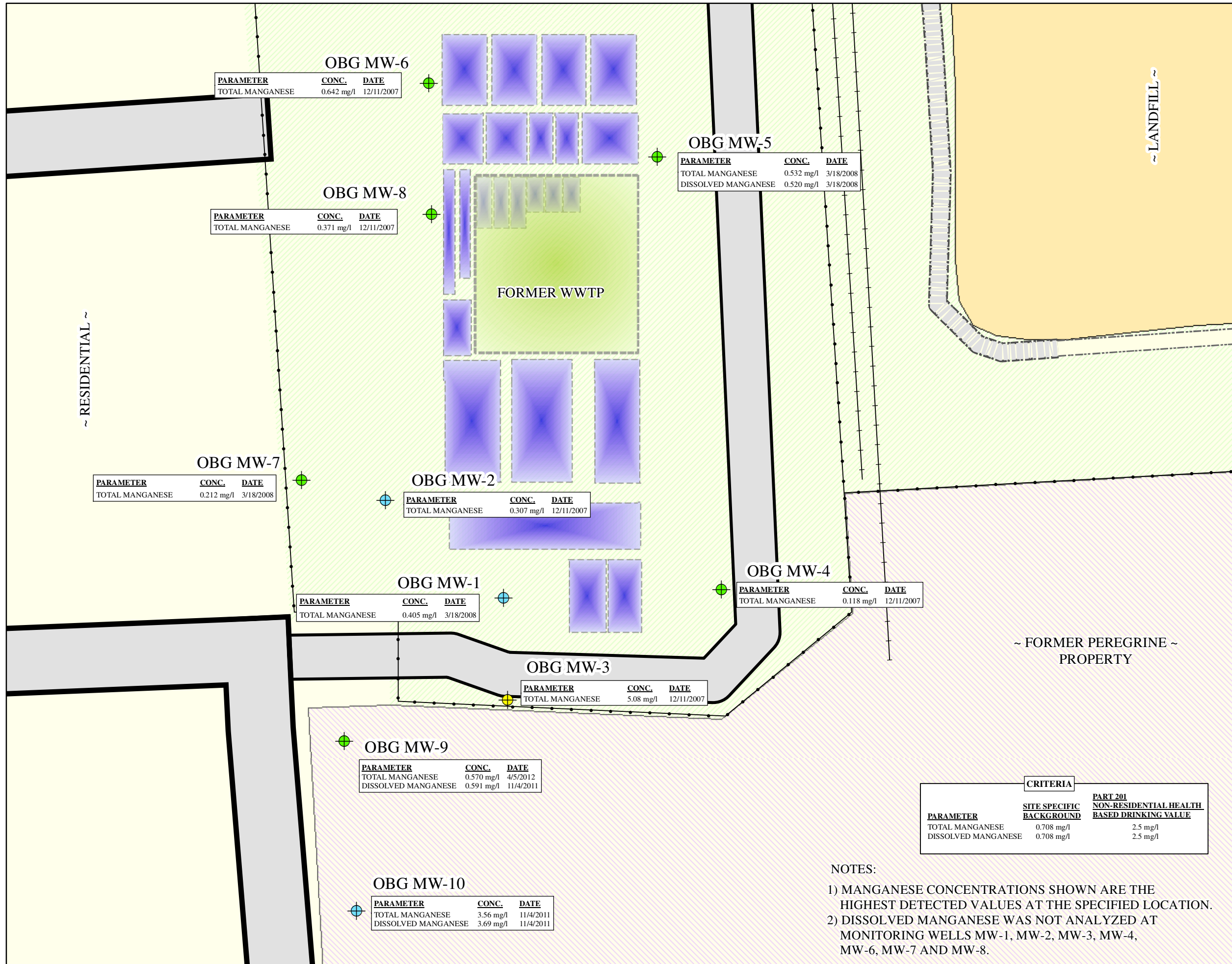







FIGURE 7

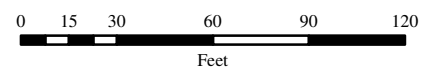


LEGEND

-  FORMER WWTP BUILDING
-  FORMER WWTP BASIN
-  MONITORING WELL THAT DELINEATES MANGANESE BELOW THE SITE SPECIFIC BACKGROUND VALUE
-  ON-SITE MONITORING WELL WITH MANGANESE CONCENTRATION ABOVE CLEANUP CRITERIA
-  MONITORING WELL

RACER TRUST
COLDWATER ROAD
FORMER WWTP
FLINT, MICHIGAN

**GROUNDWATER
DELINEATION WELLS**



NOVEMBER 2012
15388/48360-008



PARAMETER	CRITERIA	
	SITE SPECIFIC BACKGROUND	PART 201 NON-RESIDENTIAL HEALTH BASED DRINKING VALUE
TOTAL MANGANESE	0.708 mg/l	2.5 mg/l
DISSOLVED MANGANESE	0.708 mg/l	2.5 mg/l

- NOTES:
- 1) MANGANESE CONCENTRATIONS SHOWN ARE THE HIGHEST DETECTED VALUES AT THE SPECIFIED LOCATION.
 - 2) DISSOLVED MANGANESE WAS NOT ANALYZED AT MONITORING WELLS MW-1, MW-2, MW-3, MW-4, MW-6, MW-7 AND MW-8.