

TO
Christine Matlock, EGLE

COPIES
Joe Rogers, EGLE
John McCabe, EGLE
Dave Favero, RACER Trust

DATE
January 20, 2022

PROJECT NUMBER
30075941

FROM
Arcadis of Michigan, LLC

SUBJECT
RACER Lansing – Plant 2 Vault Closure Summary

Arcadis of Michigan, LLC (Arcadis) on behalf of Revitalizing Auto Communities Environmental Response (RACER) Trust has completed closure activities of the subsurface concrete vault at Plant 2 (site) in Lansing, Michigan. The proposed vault closure activities were detailed in the *Plant 2 Vault Scope of Work* (Arcadis 2021) and modified via email correspondence with the Michigan Department of Environment, Great Lakes and Energy (EGLE). Final approval of the Plant 2 vault closure was provided via email from Joe Rogers of EGLE on July 21, 2021, and via formal letter on October 27, 2021. The general location of Plant 2 is provided on **Figure 1** and the location of the subsurface vault structure at Plant 2 is provided on **Figure 2**.

Concrete Vault in Area 5-2 at Plant 2 – Structure Details

During previous investigations in Area 5-2, the concrete vault was discovered approximately 20-feet south of monitoring well P2-SB-37/MW-37 (**Figure 2**). The concrete vault was estimated to measure approximately 25-feet long (east to west), 4-feet wide, and 4-feet deep. The concrete slab covering the vault area was determined to be 10-inches thick at the time of initial investigation. Based on the water level at the time of initial investigations and approximate size of the vault structure it was estimated that an approximate volume of liquid contained in the vault was 1,500-gallons.

During vault closure activities, conducted on October 11-12, 2021, the concrete vault was determined to be 36-feet long (east to west), 6-feet wide, and 4-feet deep. The water level in surrounding monitoring wells at the time of the vault closure was approximately 1-foot below ground surface (bgs) and the water level in the vault was observed to be just below the concrete after accessing the vault through several concrete cores. The estimated volume of water was determined to be approximately 6,500-gallons contained within the Plant 2 vault structure.

Site Preparation and Concrete Coring

Prior to beginning liquid removal activities from the concrete vault structure, a private utility locate was conducted on October 11th, 2021, by FMCI to ensure that no subsurface utilities or other structures were in the vicinity of the work area where concrete coring was to take place. Arcadis was also present during utility locate to document FMCI findings. The area was cleared for utilities and the work area was cordoned off. Concrete coring was completed by Job Site Services (JSS) and a total of 5 concrete cores were completed through the top of the

concrete vault along its length for access. The concrete above the vault was found to be approximately 20-inches thick instead of 10-inches thick, which was documented during initial investigations.

Concrete Vault Closure Activities

After utility clearance and concrete coring activities, the liquids were pumped through the openings in the top of the vault into a vacuum truck. As detailed in the *Plant 2 Scope of Work* (Arcadis 2021), the liquids from the vault were to be loaded directly into a vacuum truck and then taken to US Ecology for disposal. However, due the larger than anticipated dimensions, more volume was present within the vault than the vacuum truck could transport. Therefore, the liquids were transferred from the vacuum truck into a frac tank staged on-site. As the liquid within the concrete vault was pumped, JSS completed power washing activities of the interior of the vault structure. Due to infiltration of groundwater from the surrounding soils, pressure washing was limited to approximately 20% of the vault. Due to the continuous influx of groundwater, flowable fill material was introduced to the vault while the liquid contents were pumped out at the opposite end of the vault. A total of 12,800-gallons of water was pumped into the on-site frac tank from the concrete vault, which also included wash water from pressure washing. A total of 37 cubic yards of flowable fill was used to fill the void space of the concrete vault to the surface including the concrete core locations. All vault closure activities were completed on October 12th, 2021, with additional flowable fill added to top off the vault the morning of October 13th, 2021.

Waste Characterization and Waste Disposal Activities

Since the liquids contained in the vault along with the wash water was combined into the frac tank on-site, a sample was collected for waste characterization on October 13, 2021. EGLE also indicated that they would like a sample analyzed of the wash water as outlined in the email from Joe Rogers of EGLE on July 21, 2021, and via formal letter on October 27, 2021. The water sample was submitted to Merit Laboratories, Inc. (Merit) in Lansing, Michigan for analysis of waste characterization parameters (VOCs, PCBs, TCLP SVOCs, TCLP Metals, pH, and flashpoint) and EGLE PFAS 28 Compounds. The laboratory analytical reports are included in **Attachment 1**.

The water was found to be nonhazardous but did contain low levels of several PFAS. The Plant 2 vault wastewater was approved for disposal at Valicor Environmental Services, Inc. (Valicor) in Inkster, Michigan. A total of 12,800-gallons was transported to the Valicor disposal facility by Valicor transport using vacuum trucks. The waste disposal manifests are provided in **Attachment 2**. The on-site frac tank was then cleaned by Young's Environmental Cleanup, Inc. (Young's) and the wash out material was also disposed of at Valicor and transported by Youngs. The waste manifest for the wash out water is also provided in **Attachment 2**.

Should you have any questions regarding the completed work, please contact David Favero at (217) 741-6235 or Tiffany Linder at (810) 225-1928.

References:

Arcadis. 2021. Plant 2 Vault Scope of Work, RACER Trust Lansing Industrial Land. Plants 2 & 3 MID 980 700 827, Lansing, Michigan. April 13, 2021.

RACER Lansing – Plant 2 Vault Closure Summary
EGLE
January 20, 2022

Enclosures:

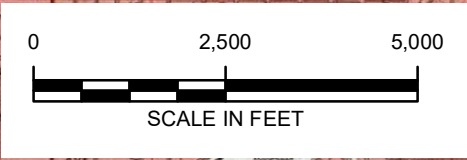
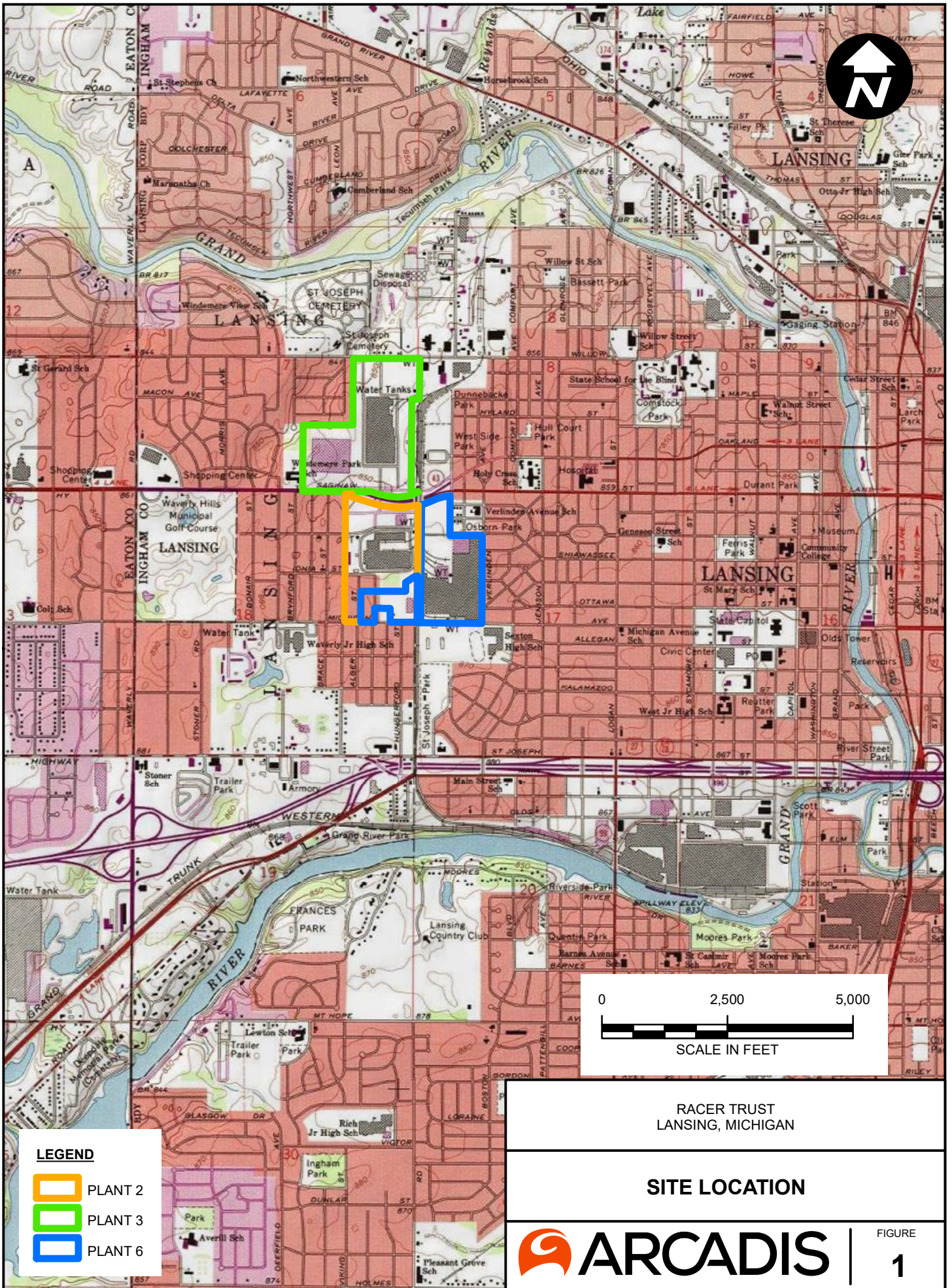
Figures

- 1 Site Location
- 2 Plant 2 Vault Location

Attachments

- 1 Waste Characterization Laboratory Analytical Reports
- 2 Waste Manifests

Figures



LEGEND

- PLANT 2
- PLANT 3
- PLANT 6

RACER TRUST
 LANSING, MICHIGAN

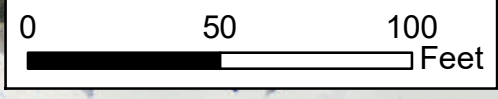
SITE LOCATION

FIGURE
1

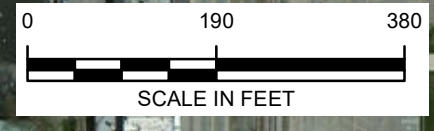
CITY: Novi DIV: ENV DB: TRY PIC: Jeff Barrett PM: Randy Christensen TM: Tiffany Linder TR: PROJECT NUMBER: 30075941 COORDINATE SYSTEM: NAD 1983 StatePlane Michigan South FIPS 2113 Feet Intl
 T:_ENV\RACER\Buffalo\MXD\2020 P2 P3 Corrective Measures Workplan\Plant2_ValutLocation.mxd PLOTTED: 1/4/2022 1:40:38 PM BY: KPullen



SEE INSET BELOW FOR A ZOOMED IN VIEW OF THE CONCRETE VAULT LOCATION.



1 inch = 50 feet



SCALE IN FEET

- LEGEND**
- LNAPL MONITORING WELL
 - CONCRETE VAULT
 - PLANT 2
 - PLANT 6

RACER TRUST
 PLANT 2
 LANSING, MICHIGAN

PLANT 2 VAULT LOCATION

Attachment 1

Waste Characterization Laboratory Analytical Reports



Analytical Laboratory Report

Report ID: S29262.01(01)
Generated on 10/27/2021

Report to

Attention: Tiffany Linder
Arcadis
28550 Cabot Drive
Suite 500
Novi, MI 48377

Phone: 248-994-2272 FAX:
Email: tiffany.linder@arcadis-us.com

Report produced by

Merit Laboratories, Inc.
2680 East Lansing Drive
East Lansing, MI 48823

Phone: (517) 332-0167 FAX: (517) 332-6333

Contacts for report questions:
John Lavery (johnlavery@meritlabs.com)
Barbara Ball (bball@meritlabs.com)

Report Summary

Lab Sample ID(s): S29262.01
Project: 30105710.01 / Plant 2 Vault Closure
Collected Date(s): 10/13/2021
Submitted Date/Time: 10/13/2021 14:45
Sampled by: A. Mandich
P.O. #: 30105710.01

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Maya Murshak
Technical Director



Analytical Laboratory Report

General Report Notes

Analytical results relate only to the samples tested, in the condition received by the laboratory.

Methods may be modified for improved performance.

Results reported on a dry weight basis where applicable.

'Not detected' indicates that parameter was not found at a level equal to or greater than the reporting limit (RL).

40 CFR Part 136 Table II Required Containers, Preservation Techniques and Holding Times for the Clean Water Act specify that samples for acrolein and acrylonitrile need to be preserved at a pH in the range of 4 to 5 or if not preserved, analyzed within 3 days of sampling.

QA/QC corresponding to this analytical report is a separate document with the same Merit ID reference and is available upon request.

Full accreditation certificates are available upon request. Starred (*) analytes are not NELAP accredited.

Samples are held by the lab for 30 days from the final report date unless a written request to hold longer is provided by the client.

Report shall not be reproduced except in full, without the written approval of Merit Laboratories, Inc.

Limits for drinking water samples, are listed as the MCL Limits (Maximum Contaminant Level Concentrations)

PFAS requirement: Section 9.3.8 of U.S. EPA Method 537.1 states "If the method analyte(s) found in the Field Sample is present in the

FRB at a concentration greater than 1/3 the MRL, then all samples collected with that FRB are invalid and must be recollected and reanalyzed."

Samples submitted without an accompanying FRB may not be acceptable for compliance purposes.

Wisconsin PFAs analysis: MDL = LOD; RL = LOQ. LOD and LOQ are adjusted for dilution.

Report Narrative

There is no additional narrative for this analytical report



Analytical Laboratory Report

Laboratory Certifications

Authority	Certification ID
Michigan DEQ	#9956
DOD ELAP/ISO 17025	#69699
WBENC	#2005110032
Ohio VAP	#CL0002
Indiana DOH	#C-MI-07
New York NELAC	#11814
North Carolina DENR	#680
North Carolina DOH	#26702
Alaska CSLAP	#17-001
Pennsylvania DEP	#68-05884
Wisconsin DNR	FID# 399147320

Qualifier Descriptions

Qualifier	Description
!	Result is outside of stated limit criteria
B	Compound also found in associated method blank
E	Concentration exceeds calibration range
F	Analysis run outside of holding time
G	Estimated result due to extraction run outside of holding time
H	Sample submitted and run outside of holding time
I	Matrix interference with internal standard
J	Estimated value less than reporting limit, but greater than MDL
L	Elevated reporting limit due to low sample amount
M	Result reported to MDL not RDL
O	Analysis performed by outside laboratory. See attached report.
R	Preliminary result
S	Surrogate recovery outside of control limits
T	No correction for total solids
X	Elevated reporting limit due to matrix interference
Y	Elevated reporting limit due to high target concentration
b	Value detected less than reporting limit, but greater than MDL
e	Reported value estimated due to interference
j	Analyte also found in associated method blank
p	Benzo(b)Fluoranthene and Benzo(k)Fluoranthene integrated as one peak.
x	Preserved from bulk sample

Glossary of Abbreviations

Abbreviation	Description
RL/RDL	Reporting Limit
MDL	Method Detection Limit
MS	Matrix Spike
MSD	Matrix Spike Duplicate
SW	EPA SW 846 (Soil and Wastewater) Methods
E	EPA Methods
SM	Standard Methods
LN	Linear
BR	Branched



Analytical Laboratory Report

Method Summary

Method	Version
ASTMD3278 - 96	ASTM Method D3278 - 96(2011)
E608.3	EPA Method 608.3 December 2016
N/A	Not Applicable
SW1311	SW 846 Method 1311 Revision 0 July 1992
SW3015A	SW 846 Method 3015A Revision 1 February 2007
SW3535A	SW 846 Method 3535A Revision 1 February 2007
SW5030C/8260C	SW 846 Method 8260C Revision 3 August 2006 / 5030C Revision 3 May 2003
SW6020A	SW 846 Method 6020A Revision 1 February 2007
SW7471B	SW 846 Method 7471B Revision 2 February 2007
SW8270D	SW 846 Method 8270D Revision 4 February 2007
SW9045D	SW 846 Method 9045D Revision 4 November 2004



Analytical Laboratory Report

Sample Summary (1 samples)

Sample ID	Sample Tag	Matrix	Collected Date/Time
S29262.01	P2 Vault	Groundwater	10/13/21 10:00



Analytical Laboratory Report

Lab Sample ID: S29262.01

Sample Tag: P2 Vault

Collected Date/Time: 10/13/2021 10:00

Matrix: Groundwater

COC Reference: 140966

Sample Containers

#	Type	Preservative(s)	Refrigerated?	Arrival Temp. (C)	Thermometer #
3	40ml Glass	HCL	Yes	4.1	IR
2	1L Amber	None	Yes	4.1	IR
2	32oz Glass	None	Yes	4.1	IR

Extraction / Prep.

Parameter	Result	Method	Run Date	Analyst	Flags
pH check for VOCs*	<2	N/A	10/18/21 11:30	BML	
Metal Digestion	Completed	SW3015A	10/25/21 10:30	CCM	
Extraction, PCB*	Completed	E608.3	10/13/21 17:00	JWR	
TCLP/SPLP BNA Extraction*	Completed	SW3535A	10/25/21 17:00	PTW	
Mercury Digestion*	Completed	SW7471B	10/26/21 16:15	JRH	

TCLP Extraction

Parameter	Result	Method	Run Date	Analyst	Flags
Initial Sample pH	<0.5%	SW1311	10/24/21 13:00 - 10/24/21	BJB	
pH after 3.5 ml HCl	<0.5%	SW1311	10/24/21 13:00 - 10/24/21	BJB	
% Solids	<0.5%	SW1311	10/24/21 13:00 - 10/24/21	BJB	
Sample Used g	<0.5%	SW1311	10/24/21 13:00 - 10/24/21	BJB	
Final Volume mL	<0.5%	SW1311	10/24/21 13:00 - 10/24/21	BJB	
TCLP Extraction Fluid	<0.5%	SW1311	10/24/21 13:00 - 10/24/21	BJB	
Final Extract pH	<0.5%	SW1311	10/24/21 13:00 - 10/24/21	BJB	

Inorganics

Method: ASTM D3278 - 96, Run Date: 10/14/21 14:30, Analyst: PL

Parameter	Result	RL	MDL	Units	Dilution	CAS#	Flags	Limits
Flash Point*	Not detected	180		oF	1			<140

Method: SW9045D, Run Date: 10/18/21 21:03, Analyst: ASB

Parameter	Result	RL	MDL	Units	Dilution	CAS#	Flags	Limits
pH/ Corrosivity*	8.18	0.01		STD Units	1			2-12.5

Metals

Method: SW6020A, Run Date: 10/25/21 13:04, Analyst: CCM

Parameter	Result	RL	MDL	Units	Dilution	CAS#	Flags	Limits
Arsenic, TCLP	Not detected	0.02		mg/L	25	7440-38-2		5.0
Barium, TCLP	Not detected	0.05		mg/L	25	7440-39-3		100.0
Cadmium, TCLP	Not detected	0.005		mg/L	25	7440-43-9		1.0
Chromium, TCLP	Not detected	0.05		mg/L	25	7440-47-3		5.0
Lead, TCLP	Not detected	0.03		mg/L	25	7439-92-1		5.0
Selenium, TCLP	Not detected	0.05		mg/L	25	7782-49-2		1.0
Silver, TCLP	Not detected	0.005		mg/L	25	7440-22-4		5.0

Method: SW7471B, Run Date: 10/26/21 20:50, Analyst: JRH

Parameter	Result	RL	MDL	Units	Dilution	CAS#	Flags	Limits
Mercury, TCLP*	Not detected	0.0005		mg/L	2	7439-97-6		0.2



Analytical Laboratory Report

Lab Sample ID: S29262.01 (continued)

Sample Tag: P2 Vault

Organics - PCBs/Pesticides

PCB, Method: E608.3, Run Date: 10/18/21 16:50, Analyst: JANB

Parameter	Result	RL	MDL	Units	Dilution	CAS#	Flags	Limits
PCB-1016	Not detected	0.1		ug/L	1	12674-11-2		
PCB-1221	Not detected	0.1		ug/L	1	11104-28-2		
PCB-1232	Not detected	0.1		ug/L	1	11141-16-5		
PCB-1242	0.9	0.1		ug/L	1	53469-21-9		
PCB-1248	Not detected	0.1		ug/L	1	12672-29-6		
PCB-1254	1	0.1		ug/L	1	11097-69-1		
PCB-1260	Not detected	0.1		ug/L	1	11096-82-5		
PCB, Total*	1.9	0.1		ug/L	1	1336-36-3		

Organics - Semi-Volatiles

TCLP Semi Volatiles, Method: SW8270D, Run Date: 10/26/21 19:12, Analyst: PL

Parameter	Result	RL	MDL	Units	Dilution	CAS#	Flags	Limits
2-Methylphenol (o-Cresol)	Not detected	1,000		ug/L	10	95-48-7		200,000
3-, 4-Methylphenol (p,m-Cresol)	Not detected	1,000		ug/L	10	3/4-CRESOL		200,000
Pentachlorophenol	Not detected	1,000		ug/L	10	87-86-5		100,000
2,4,5-Trichlorophenol	Not detected	1,000		ug/L	10	95-95-4		400,000
2,4,6-Trichlorophenol	Not detected	1,000		ug/L	10	88-06-2		2,000
2,4-Dinitrotoluene	Not detected	90		ug/L	10	121-14-2		130
Hexachlorobenzene	Not detected	90		ug/L	10	118-74-1		130
Hexachlorobutadiene	Not detected	100		ug/L	10	87-68-3		500
Hexachloroethane	Not detected	100		ug/L	10	67-72-1		3,000
Nitrobenzene	Not detected	100		ug/L	10	98-95-3		2,000
Pyridine	Not detected	100		ug/L	10	110-86-1		5,000

Organics - Volatiles

Volatile Organics - DEQ List, Method: SW5030C/8260C, Run Date: 10/18/21 17:26, Analyst: KAG

Parameter	Result	RL	MDL	Units	Dilution	CAS#	Flags	Limits
Acetone	Not detected	500		ug/L	10	67-64-1	Y	
Acrylonitrile	Not detected	20		ug/L	10	107-13-1	Y	
2-Butanone (MEK)	Not detected	250		ug/L	10	78-93-3	Y	200,000
Benzene	Not detected	10		ug/L	10	71-43-2	Y	500
n-Butylbenzene	Not detected	10		ug/L	10	104-51-8	Y	
Bromobenzene	Not detected	10		ug/L	10	108-86-1	Y	
Bromochloromethane	Not detected	10		ug/L	10	74-97-5	Y	
Bromodichloromethane	Not detected	10		ug/L	10	75-27-4	Y	
Bromoform	Not detected	10		ug/L	10	75-25-2	Y	
Bromomethane	Not detected	50		ug/L	10	74-83-9	Y	
sec-Butylbenzene	Not detected	10		ug/L	10	135-98-8	Y	
tert-Butylbenzene	Not detected	10		ug/L	10	98-06-6	Y	
Carbon disulfide	Not detected	50		ug/L	10	75-15-0	Y	
Carbon tetrachloride	Not detected	10		ug/L	10	56-23-5	Y	500
Chlorobenzene	Not detected	10		ug/L	10	108-90-7	Y	100,000
Chloroethane	Not detected	50		ug/L	10	75-00-3	Y	
Chloroform	Not detected	10		ug/L	10	67-66-3	Y	6,000
Chloromethane	Not detected	50		ug/L	10	74-87-3	Y	
1,1-Dichloroethane	280	10		ug/L	10	75-34-3	Y	
1,1-Dichloroethene	Not detected	10		ug/L	10	75-35-4	Y	700
1,2-Dibromo-3-chloropropane	Not detected	50		ug/L	10	96-12-8	Y	

Y-Elevated reporting limit due to high target concentration



Analytical Laboratory Report

Lab Sample ID: S29262.01 (continued)

Sample Tag: P2 Vault

Volatile Organics - DEQ List, Method: SW5030C/8260C, Run Date: 10/18/21 17:26, Analyst: KAG (continued)

Parameter	Result	RL	MDL	Units	Dilution	CAS#	Flags	Limits
1,2-Dibromoethane	Not detected	10		ug/L	10	106-93-4	Y	
1,2-Dichlorobenzene	Not detected	10		ug/L	10	95-50-1	Y	
1,2-Dichloroethane	Not detected	10		ug/L	10	107-06-2	Y	500
1,2-Dichloropropane	Not detected	10		ug/L	10	78-87-5	Y	
1,3-Dichlorobenzene	Not detected	10		ug/L	10	541-73-1	Y	
1,4-Dichlorobenzene	Not detected	10		ug/L	10	106-46-7	Y	7,500
cis-1,2-Dichloroethene	Not detected	10		ug/L	10	156-59-2	Y	
cis-1,3-Dichloropropene	Not detected	10		ug/L	10	10061-01-5	Y	
Dibromochloromethane	Not detected	50		ug/L	10	124-48-1	Y	
Dibromomethane	Not detected	50		ug/L	10	74-95-3	Y	
Dichlorodifluoromethane	Not detected	50		ug/L	10	75-71-8	Y	
Diethyl ether	Not detected	100		ug/L	10	60-29-7	Y	
trans-1,2-Dichloroethene	Not detected	10		ug/L	10	156-60-5	Y	
trans-1,3-Dichloropropene	Not detected	10		ug/L	10	10061-02-6	Y	
trans-1,4-Dichloro-2-butene	Not detected	10		ug/L	10	110-57-6	Y	
Ethylbenzene	Not detected	10		ug/L	10	100-41-4	Y	
2-Hexanone	Not detected	500		ug/L	10	591-78-6	Y	
Hexachloroethane	Not detected	50		ug/L	10	67-72-1	Y	3,000
p-Isopropyltoluene	Not detected	50		ug/L	10	99-87-6	Y	
Isopropylbenzene	Not detected	50		ug/L	10	98-82-8	Y	
2-Methylnaphthalene	Not detected	50		ug/L	10	91-57-6	Y	
4-Methyl-2-pentanone (MIBK)	Not detected	500		ug/L	10	108-10-1	Y	
tert-Methyl butyl ether (MTBE)	Not detected	50		ug/L	10	1634-04-4	Y	
Methyl iodide	Not detected	10		ug/L	10	74-88-4	Y	
Methylene chloride	Not detected	50		ug/L	10	75-09-2	Y	
Naphthalene	Not detected	50		ug/L	10	91-20-3	Y	
n-Propylbenzene	Not detected	10		ug/L	10	103-65-1	Y	
Styrene	Not detected	10		ug/L	10	100-42-5	Y	
1,1,1,2-Tetrachloroethane	Not detected	10		ug/L	10	630-20-6	Y	
1,1,1-Trichloroethane	150	10		ug/L	10	71-55-6	Y	
1,1,2,2-Tetrachloroethane	Not detected	10		ug/L	10	79-34-5	Y	
1,1,2-Trichloroethane	Not detected	10		ug/L	10	79-00-5	Y	
1,2,3-Trichlorobenzene	Not detected	50		ug/L	10	87-61-6	Y	
1,2,3-Trichloropropane	Not detected	10		ug/L	10	96-18-4	Y	
1,2,3-Trimethylbenzene	Not detected	10		ug/L	10	526-73-8	Y	
1,2,4-Trichlorobenzene	Not detected	50		ug/L	10	120-82-1	Y	
1,2,4-Trimethylbenzene	Not detected	10		ug/L	10	95-63-6	Y	
1,3,5-Trimethylbenzene	Not detected	10		ug/L	10	108-67-8	Y	
Tetrachloroethene	Not detected	10		ug/L	10	127-18-4	Y	700
Tetrahydrofuran*	Not detected	900		ug/L	10	109-99-9	Y	
Toluene	Not detected	10		ug/L	10	108-88-3	Y	
Trichloroethene	Not detected	10		ug/L	10	79-01-6	Y	500
Trichlorofluoromethane	Not detected	10		ug/L	10	75-69-4	Y	
Vinyl chloride	Not detected	10		ug/L	10	75-01-4	Y	200
o-Xylene	Not detected	10		ug/L	10	95-47-6	Y	
p,m-Xylene*	Not detected	20		ug/L	10		Y	

Y-Elevated reporting limit due to high target concentration

Merit Laboratories Login Checklist

Lab Set ID:S29262

Client:ARCADIS_NOVI (ARCADIS U.S., Inc.)

Project: 30105710.01 / Plant 2 Vault Closure

Submitted: 10/13/2021 14:45 Login User: SRS

Attention: Tiffany Linder

Address: Arcadis
28550 Cabot Drive
Suite 500
Novi, MI 48377

Phone: 248-994-2272 FAX:
Email: tiffany.linder@arcadis-us.com

Selection	Description	Note
Sample Receiving		
01.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Samples are received at 4C +/- 2C Thermometer # IR 4.1
02.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Received on ice/ cooling process begun
03.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	Samples shipped
04.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	Samples left in 24 hr. drop box
05.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	Are there custody seals/tape or is the drop box locked
Chain of Custody		
06.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	COC adequately filled out
07.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	COC signed and relinquished to the lab
08.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Sample tag on bottles match COC
09.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	Subcontracting needed? Subcontracted to:
Preservation		
10.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Do sample have correct chemical preservation
11.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	Completed pH checks on preserved samples? (no VOAs)
12.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	Did any samples need to be preserved in the lab?
Bottle Conditions		
13.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	All bottles intact
14.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Appropriate analytical bottles are used
15.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Merit bottles used
16.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Sufficient sample volume received
17.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	Samples require laboratory filtration
18.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Samples submitted within holding time
19.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	Do water VOC or TOX bottles contain headspace

Corrective action for all exceptions is to call the client and to notify the project manager.

Client Review By: _____ Date: _____



Analytical Laboratory Report

Report ID: S29263.01(01)
Generated on 10/29/2021

Report to

Attention: Tiffany Linder
Arcadis
28550 Cabot Drive
Suite 500
Novi, MI 48377

Phone: 248-994-2272 FAX:
Email: tiffany.linder@arcadis-us.com

Report produced by

Merit Laboratories, Inc.
2680 East Lansing Drive
East Lansing, MI 48823

Phone: (517) 332-0167 FAX: (517) 332-6333

Contacts for report questions:
John Lavery (johnlavery@meritlabs.com)
Barbara Ball (bball@meritlabs.com)

Report Summary

Lab Sample ID(s): S29263.01
Project: 30105710.01 / Plant 2 Vault Closure
Collected Date(s): 10/13/2021
Submitted Date/Time: 10/13/2021 14:45
Sampled by: A. Mandich
P.O. #: 30105710.01

Table of Contents

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Maya Murshak
Technical Director



Analytical Laboratory Report

General Report Notes

Analytical results relate only to the samples tested, in the condition received by the laboratory.

Methods may be modified for improved performance.

Results reported on a dry weight basis where applicable.

'Not detected' indicates that parameter was not found at a level equal to or greater than the reporting limit (RL).

40 CFR Part 136 Table II Required Containers, Preservation Techniques and Holding Times for the Clean Water Act specify that samples for acrolein and acrylonitrile need to be preserved at a pH in the range of 4 to 5 or if not preserved, analyzed within 3 days of sampling.

QA/QC corresponding to this analytical report is a separate document with the same Merit ID reference and is available upon request.

Full accreditation certificates are available upon request. Starred (*) analytes are not NELAP accredited.

Samples are held by the lab for 30 days from the final report date unless a written request to hold longer is provided by the client.

Report shall not be reproduced except in full, without the written approval of Merit Laboratories, Inc.

Limits for drinking water samples, are listed as the MCL Limits (Maximum Contaminant Level Concentrations)

PFAS requirement: Section 9.3.8 of U.S. EPA Method 537.1 states "If the method analyte(s) found in the Field Sample is present in the

FRB at a concentration greater than 1/3 the MRL, then all samples collected with that FRB are invalid and must be recollected and reanalyzed."

Samples submitted without an accompanying FRB may not be acceptable for compliance purposes.

Wisconsin PFAs analysis: MDL = LOD; RL = LOQ. LOD and LOQ are adjusted for dilution.

Report Narrative

Bottles not provided per method. Sample poured off to analyze.



Analytical Laboratory Report

Laboratory Certifications

Authority	Certification ID
Michigan DEQ	#9956
DOD ELAP/ISO 17025	#69699
WBENC	#2005110032
Ohio VAP	#CL0002
Indiana DOH	#C-MI-07
New York NELAC	#11814
North Carolina DENR	#680
North Carolina DOH	#26702
Alaska CSLAP	#17-001
Pennsylvania DEP	#68-05884
Wisconsin DNR	FID# 399147320

Qualifier Descriptions

Qualifier	Description
!	Result is outside of stated limit criteria
B	Compound also found in associated method blank
E	Concentration exceeds calibration range
F	Analysis run outside of holding time
G	Estimated result due to extraction run outside of holding time
H	Sample submitted and run outside of holding time
I	Matrix interference with internal standard
J	Estimated value less than reporting limit, but greater than MDL
L	Elevated reporting limit due to low sample amount
M	Result reported to MDL not RDL
O	Analysis performed by outside laboratory. See attached report.
R	Preliminary result
S	Surrogate recovery outside of control limits
T	No correction for total solids
X	Elevated reporting limit due to matrix interference
Y	Elevated reporting limit due to high target concentration
b	Value detected less than reporting limit, but greater than MDL
e	Reported value estimated due to interference
j	Analyte also found in associated method blank
p	Benzo(b)Fluoranthene and Benzo(k)Fluoranthene integrated as one peak.
x	Preserved from bulk sample

Glossary of Abbreviations

Abbreviation	Description
RL/RDL	Reporting Limit
MDL	Method Detection Limit
MS	Matrix Spike
MSD	Matrix Spike Duplicate
SW	EPA SW 846 (Soil and Wastewater) Methods
E	EPA Methods
SM	Standard Methods
LN	Linear
BR	Branched



Analytical Laboratory Report

Method Summary

Method	Version
ASTMD7979-19M	ASTM Method D7979 - 19 Modified (Isotopic Dilution)

Parameter Summary

Parameter	Synonym	Cas #
PFBA	Perfluorobutanoic Acid	375-22-4
PFPeA	Perfluoropentanoic Acid	2706-90-3
4:2 FTSA	4:2 Fluorotelomer Sulfonic Acid	757124-72-4
PFHxA	Perfluorohexanoic Acid	307-24-4
PFBS	Perfluorobutane sulfonic Acid	375-73-5
PFHpA	Perfluoroheptanoic Acid	375-85-9
PFPeS	Perfluoropentane Sulfonic Acid	2706-91-4
6:2 FTSA	6:2 Fluorotelomer Sulfonic Acid	27619-97-2
PFOA	Perfluorooctanoic Acid	335-67-1
PFHxS	Perfluorohexane Sulfonic Acid	355-46-4
PFHxS-LN	Perfluorohexane Sulfonic Acid - LN	355-46-4-LN
PFHxS-BR	Perfluorohexane Sulfonic Acid - BR	355-46-4-BR
PFNA	Perfluorononanoic Acid	375-95-1
8:2 FTSA	8:2 Fluorotelomer Sulfonic Acid	39108-34-4
PFHpS	Perfluoroheptane Sulfonic Acid	375-92-8
PFDA	Perfluorodecanoic Acid	335-76-2
N-MeFOSAA	N-methyl perfluorooctanesulfonamidoacetic acid	2355-31-9
EtFOSAA	N-Ethyl Perfluorooctane Sulfonamidoacetic Acid	2991-50-6
PFOS	Perfluorooctane Sulfonic Acid	1763-23-1
PFOS-LN	Perfluorooctane Sulfonic Acid - LN	1763-23-1-LN
PFOS-BR	Perfluorooctane Sulfonic Acid - BR	1763-23-1-BR
PFUnDA	Perfluoroundecanoic Acid	2058-94-8
PFNS	Perfluorononane Sulfonic Acid	68259-12-1
PFDoDA	Perfluorododecanoic Acid	307-55-1
PFDS	Perfluorodecane Sulfonic Acid	335-77-3
PFTTrDA	Perfluorotridecanoic Acid	72629-94-8
FOSA	Perfluorooctane Sulfonamide	754-91-6
PFTeDA	Perfluorotetradecanoic Acid	376-06-7
11Cl-PF3OUdS	11-chloroeicosafuoro-3-oxaundecane-1-sulfonic acid	763051-92-9
9Cl-PF3ONS	9-chlorohexadecafluoro-3-oxanone1-sulfonic acid	756426-58-1
ADONA	4,8-dioxa-3H-perfluorononanoic acid	919005-14-4
HFPO-DA	Hexafluoropropylene oxide dimer	13252-13-6



Analytical Laboratory Report

Sample Summary (1 samples)

Sample ID	Sample Tag	Matrix	Collected Date/Time
S29263.01	P2 Vault	Groundwater	10/13/21 10:00



Analytical Laboratory Report

Lab Sample ID: S29263.01

Sample Tag: P2 Vault

Collected Date/Time: 10/13/2021 10:00

Matrix: Groundwater

COC Reference: 140966

Sample Containers

#	Type	Preservative(s)	Refrigerated?	Arrival Temp. (C)	Thermometer #
1	32oz Glass	None	Yes	4.1	IR

Extraction / Prep.

Parameter	Result	Method	Run Date	Analyst	Flags
Initial wt. (g) / Final wt. (g) / Volume (ml)*	11.89/6.89/10	ASTMD7979-19M	10/21/21 08:00	KCV	

Organics

28 PFAs, Method: ASTMD7979-19M, Run Date: 10/25/21 20:29, Analyst: KCV

Parameter	Result	RL	MDL	Units	Dilution	CAS#	Flags
PFBA*	Not detected	40		ng/L	2	375-22-4	X1
PFPeA*	18	4.0		ng/L	2	2706-90-3	1
4:2 FTSA*	Not detected	2.0		ng/L	2	757124-72-4	1
PFHxA*	20	2.0		ng/L	2	307-24-4	1
PFBS*	2.4	2.0		ng/L	2	375-73-5	1
PFHpA*	20	2.0		ng/L	2	375-85-9	1
PFPeS*	Not detected	2.0		ng/L	2	2706-91-4	1
6:2 FTSA*	4.3	4.0		ng/L	2	27619-97-2	1
PFOA*	45	2.0		ng/L	2	335-67-1	1
PFHxS*	3.7	2.0		ng/L	2	355-46-4	1
PFHxS-LN*	3.2	2.0		ng/L	2	355-46-4-LN	1
PFHxS-BR*	Not detected	2.0		ng/L	2	355-46-4-BR	1
PFNA*	7.7	2.0		ng/L	2	375-95-1	1
8:2 FTSA*	5.9	4.0		ng/L	2	39108-34-4	1
PFHpS*	Not detected	2.0		ng/L	2	375-92-8	1
PFDA*	17	2.0		ng/L	2	335-76-2	1
N-MeFOSAA*	Not detected	2.0		ng/L	2	2355-31-9	1
EtFOSAA*	Not detected	4.0		ng/L	2	2991-50-6	1
PFOS*	34	2.0		ng/L	2	1763-23-1	1
PFOS-LN*	23	2.0		ng/L	2	1763-23-1-LN	1
PFOS-BR*	10	2.0		ng/L	2	1763-23-1-BR	1
PFUnDA*	Not detected	2.0		ng/L	2	2058-94-8	1
PFNS*	Not detected	2.0		ng/L	2	68259-12-1	1
PFDODA*	Not detected	2.0		ng/L	2	307-55-1	1
PFDS*	Not detected	2.0		ng/L	2	335-77-3	1
PFTTrDA*	Not detected	2.0		ng/L	2	72629-94-8	1
FOSA*	Not detected	2.0		ng/L	2	754-91-6	1
PFTeDA*	Not detected	4.0		ng/L	2	376-06-7	1
11Cl-PF3OUdS*	Not detected	2.0		ng/L	2	763051-92-9	1
9Cl-PF3ONS*	Not detected	2.0		ng/L	2	756426-58-1	1
ADONA*	Not detected	2.0		ng/L	2	919005-14-4	1
HFPO-DA*	Not detected	10		ng/L	2	13252-13-6	1

X-Elevated reporting limit due to matrix interference 1-Bottles not provided per method. Sample poured off to analyze.

Merit Laboratories Login Checklist

Lab Set ID:S29263

Client:ARCADIS_NOVI (ARCADIS U.S., Inc.)

Project: 30105710.01 / Plant 2 Vault Closure

Submitted: 10/13/2021 14:45 Login User: SRS

Attention: Tiffany Linder

Address: Arcadis
28550 Cabot Drive
Suite 500
Novi, MI 48377

Phone: 248-994-2272 FAX:
Email: tiffany.linder@arcadis-us.com

Selection	Description	Note
Sample Receiving		
01.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Samples are received at 4C +/- 2C Thermometer # IR 4.1
02.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Received on ice/ cooling process begun
03.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	Samples shipped
04.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	Samples left in 24 hr. drop box
05.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	Are there custody seals/tape or is the drop box locked
Chain of Custody		
06.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	COC adequately filled out
07.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	COC signed and relinquished to the lab
08.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Sample tag on bottles match COC
09.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	Subcontracting needed? Subcontracted to:
Preservation		
10.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	Do sample have correct chemical preservation
11.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	Completed pH checks on preserved samples? (no VOAs)
12.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	Did any samples need to be preserved in the lab?
Bottle Conditions		
13.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	All bottles intact
14.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	Appropriate analytical bottles are used
15.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Merit bottles used
16.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Sufficient sample volume received
17.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	Samples require laboratory filtration
18.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Samples submitted within holding time
19.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	Do water VOC or TOX bottles contain headspace

Corrective action for all exceptions is to call the client and to notify the project manager.

Client Review By: _____ Date: _____

Attachment 2

Waste Manifests

T-48

MANIFEST		1. Generator ID Number: MID980700827	2. Page 1 of 1	3. Emergency Response Phone: CHEMTREC (800)424-9300 (CCN #: 659847)		Waste Tracking Number: 38737	
5. Generator's Name and Mailing Address Racer Trust 2800 W Saginaw St Lansing, MI 48917 United States Generator's Phone:				Generator's Site Address (if different than mailing address)			
6. Transporter 1 Company Name Valicor Environmental Services, LLC				U.S. EPA ID Number: OHR000200386			
7. Transporter 2 Company Name				U.S. EPA ID Number			
8. Designated Facility Name and Site Address Valicor Environmental Services, LLC 27140 Princeton Ave, Inkster, 48141 Facility's Phone: (313) 724-8600				U.S. EPA ID Number: MIDD57002602			
9. Waste Shipping Name and Description		10. Containers No. Type		11. Total Quantity		12. Unit Wt./Vol.	Profile #
Non-Regulated Oily Waste Water		1 TT		7800		gallons	
13. Special Handling Instructions and Additional Information						Truck	16323 MI
						Trailer	VTT-21
						Arrival Date	11/15/2021 9:15 AM
14. GENERATOR'S/OFFER'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all aspects in proper condition for transport according to application internal and national governmental regulations.							
Generator's/Offer's Printed/Typed Name		Signature		Month	Day	Year	
X A. Mandich on behalf of RACER		X Andrew Mandich		11	15	21	
15. Transporter Acknowledge of Receipt of Materials							
Transporter 1 Printed/Typed Name		Signature		Month	Day	Year	
John Guiles		John H. Guiles		11	15	21	
Transporter 2 Printed/Typed Name		Signature		Month	Day	Year	
16. Discrepancy							
16a. Discrepancy Indication Space	Quantity	Type	Residue	Partial Rejection	Full Rejection		
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Manifest Reference Number:							
17. Designated Facility Owner or Operator: Certification of receipt of materials covered by the manifest except as noted in item 15a.							
Printed/Typed Name		Signature		Month	Day	Year	
Victoria Mak		Victoria Mak		11	15	21	

PH 8

NOV 15 AM 11:45

NOV 15 AM 11:53

MANIFEST		1. Generator ID Number: MID980700827	2. Page 1 of 1	3. Emergency Response Phone: CHEMTREC (800)424-9300 (CCN #: 659847)		Waste Tracking Number: 38738		14		
5. Generator's Name and Mailing Address: Racer Trust 2800 W Saginaw St Lansing, MI 48917 United States Generator's Phone:				Generator's Site Address (if different than mailing address)						
6. Transporter 1 Company Name: Vallicor Environmental Services, LLC				U.S. EPA ID Number: OHR000200386						
7. Transporter 2 Company Name:				U.S. EPA ID Number:						
8. Designated Facility Name and Site Address: Vallicor Environmental Services, LLC 27140 Princeton Ave, Inkster, 48141 Facility's Phone: (313) 724-8600				U.S. EPA ID Number: MIDD57002602						
9. Waste Shipping Name and Description		10. Containers No. Type		11. Total Quantity		12. Unit Wt./Vol.		Profile #		PO#
Non-Regulated Oily Waste Water		001		5,000		gallons				
13. Special Handling Instructions and Additional Information						Truck	16320 MI			
						Trailer	VIT-19			
						Arrival Date	11/15/2021 9:15 AM			
14. GENERATOR'S/OFFER'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all aspects in proper condition for transport according to application internal and national governmental regulations.										
Generator's/Offer's Printed/Typed Name				Signature		Month	Day	Year		
A. Mandison of Racer				A. Mandison		11	15	21		
15. Transporter Acknowledge of Receipt of Materials										
Transporter 1 Printed/Typed Name				Signature		Month	Day	Year		
David Lloyd				David Lloyd		11	15	21		
Transporter 2 Printed/Typed Name				Signature		Month	Day	Year		
16. Discrepancy										
16a. Discrepancy Indication Space		Quantity	Type	Residue	Partial Rejection	Full Rejection				
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>				
Manifest Reference Number:										
17. Designated Facility Owner or Operator: Certification of receipt of materials covered by the manifest except as noted in item 15a.										
Printed/Typed Name				Signature		Month	Day	Year		
Victoria Maki				Victoria Maki		11	15	21		

PH-8

12:15 pm

NOV 15 PM 1:24

NOV 15 PM 1:50

57
10-20

15% Solid 30793

NON-HAZARDOUS WASTE MANIFEST		1. Generator ID Number N/A	2. Page 1 of 1	3. Emergency Response Phone 800-486-3647	4. Waste Tracking Number 202100822		
5. Generator's Name and Mailing Address RACER Trust 500 Woodward Avenue, Suite 2650, Detroit, MI 48226 (248) 417-8449			Generator's Address (if different than mailing address) RACER Trust 2800 West Saginaw Avenue, Lansing, MI 48909				
6. Transporter 1 Company Name Young's Environmental Cleanup Inc.			U.S. EPA ID Number MID106889506				
7. Transporter 2 Company Name			U.S. EPA ID Number				
8. Designated Facility Name and Site Address Valicor 27140 Princeton Avenue Inkster, MI 48141 313-724-8600			U.S. EPA ID Number MID057002802				
9. Waste Shipping Name and Description			10. Containers		11. Total Quantity	12. Unit Wt./Vol.	
			No.	Type			
1. RCRA Non-Hazardous and Non DOT Regulated Liquid by-Product (Non-Hazardous Groundwater Containing PFAS)			001	TT	725	G	
2.							
3.							
4.							
13. Special Handling Instructions and Additional Information							
9.1. Contains Non-Hazardous Groundwater Approval #INK-WWT-001599 *If spilled, dike area, contain in drums WO# 30793 <div style="text-align: right;"> OCT 20 PM 12:58 OCT 20 PM 1:17 W/O OCT 20 PM 1:22 </div>							
14. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable International and national governmental regulations.							
Generator's/Offeror's Printed/Typed Name A. Mandich on Behalf of RACER			Signature <i>A. Mandich</i>		Month	Day	Year
					10	20	21
15. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____							
16. Transporter Acknowledgment of Receipt of Materials							
Transporter 1 Printed/Typed Name Brian TerBurgh			Signature <i>B. TerBurgh</i>		Month	Day	Year
					10	20	21
Transporter 2 Printed/Typed Name			Signature		Month	Day	Year
17. Discrepancy							
17a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection							
Manifest Reference Number:							
17b. Alternate Facility (or Generator)			U.S. EPA ID Number				
Facility's Phone:							
17c. Signature of Alternate Facility (or Generator)					Month	Day	Year
18. Designated Facility Owner or Operator: Certification of receipt of materials covered by the manifest except as noted in Item 17a							
Printed/Typed Name Victoria Maki			Signature <i>Victoria Maki</i>		Month	Day	Year
					10	20	21