

Transmitted via E-mail

Peter Quackenbush
Michigan Department of Environmental Quality, RMD
525 West Allegan Street
Constitution Hall, North Atrium
Lansing, MI 48909-7741

ENVIRONMENT

Subject:

Quarterly Progress Report – 4th Quarter 2011
Lansing Plants 2, 3, and 6 Industrial Land
USEPA I.D.s MID980700827 and MID005356928
2801 West Saginaw St, 2800 West Saginaw St, and 401 Verlinden St.
Lansing, Michigan

Date:
January 13, 2012

Contact:
Amy Hoeksema

Dear Mr. Quackenbush:

Phone:
810.225.1911

ARCADIS is submitting this Quarterly Progress Report on behalf of Revitalizing Auto Communities Environmental Response Trust (RACER Trust) for the Lansing Plants 2, 3, and 6 Sites in Lansing, Michigan (the Sites). This Quarterly Progress Report covers the period of October 1, 2011 through December 31, 2011. The following briefly summarizes the data collected, work performed, problems encountered, project schedule, and estimated percent complete for various activities. The activities performed were completed in accordance with the approved Resource Conservation and Recovery Act Facility Investigation (RFI) Work Plan, the Quality Assurance Project Plan (QAPP), and Field Sampling Plan (FSP) (ARCADIS, August 5, 2011).

Email:
Amy.Hoeksema@arcadis-us.com

Our ref:
B0064479
B0064480
B0064481

Data Collected During the 4th Quarter of 2011

The following samples were collected during the 4th Quarter of 2011. Summary tables of the data collected during the 2011 investigation activities, for each plant, are provided at the end of this report.

- Plant 2: Six groundwater monitoring wells were sampled between October 5 and October 18, 2011. The analysis completed at each monitoring wells consisted of Target Compound List (TCL) VOCs, TCL SVOCs, Target Analyte List (TAL) Metals and Polychlorinated Biphenyls (PCBs). In addition, one sample of Light Non-Aqueous Phase Liquid (LNAPL) was collected from Plant 2 and analyzed for Total Petroleum Hydrocarbon (TPH) Gasoline

Imagine the result

Range Organics (GRO) C-5 through C-10 and TPH Diesel Range Organics (DRO) C-10 through C-34.

- Plant 3: 23 groundwater monitoring wells were sampled between October 11 and November 29, 2011. The analysis completed at each monitoring wells consisted of TCL VOCs, TCL SVOCs, TAL Metals and PCBs. In addition, one sample of LNAPL was collected from Plant 3 and analyzed for PCBs and TPH GRO C5 through C-10 and TPH DRO C10 through C-34.
- Plant 6: 22 monitoring wells were sampled between October 13 and December 2, 2011. The analysis completed at each monitoring well consisted of TCL VOCs, TCL SVOCs, TAL Metals and PCBs.
- A complete summary of the data collected in 2011 will be provided in the RFI Phase I Activities Summary Report scheduled to be submitted by January 31, 2012.

Work Performed During the 4th Quarter of 2011

- October 4 through October 19, 2011: ARCADIS completed monitoring well development and groundwater sampling on the monitoring wells at Plants 2, 3, and 6. Samples collected from each well were analyzed for TCL VOCs, TCL SVOCs, TAL Metals and PCBs. Each well was gauged for total well depth and depth to water on October 4, 2011. The following table is a list of wells developed and sampled between October 5, 2011 and October 19, 2011.

Well ID	Date Developed	Date Sampled
PLANT 2		
P2-MW-1	7/20/11	10/10/11
P2-MW-2	7/22/11	10/10/11
P2-MW-3	7/19/11	10/10/11
P2-MW-4	7/22/11	10/5/11
MW-1	10/10/11	10/18/11
MW-2	10/10/11	10/18/11
MW-3	10/10/11	10/18/11
PLANT 3		
MW-91-3	10/6/11	10/19/11
MW-02-04	10/6/11	10/11/11
MW-04-02	10/6/11	10/11/11
UNK #12	10/6/11	10/19/11
MW-04-03	10/7/11	10/11/11
MW-93-1	10/7/11	DRY
MW-02-02	10/7/11	10/13/11
MW-02-01	10/10/11	10/12/11
MW-04-01	10/10/11	10/12/11

Well ID	Date Developed	Date Sampled
MW-91-5	10/10/11	10/12/11
MW-02-03	10/11/11	10/12/11
MW-91-2	10/11/11	10/13/11
MW-19	10/13/11	10/19/11
MW-1	10/13/11	10/19/11
MW-3	10/13/11	10/19/11
UNK #9	10/13/11	10/19/11
UNK #10	10/14/11	10/19/11
PLANT 6		
MWBP-12-UST5-6	10/5/11	10/10/11
MWBP-10-UST5-6	10/5/11	10/7/11
MW-03-06	10/5/11	10/7/11
MW-04-05	10/11/11	10/13/11
MW-04-06	10/11/11	10/17/11
MW-03-01	10/11/11	10/17/11
MW-03-02	10/11/11	10/17/11
MW-03-04	10/11/11	10/17/11
MW-04-01	10/12/11	10/18/11
MW-03-07	10/12/11	10/18/11
MW-02-01	10/12/11	10/17/11
MW-02-02	10/12/11	10/18/11
MW-02-03	10/12/11	10/17/11
B-BP-16	10/12/11	10/13/11
UNK #3	10/12/11	10/14/11
MWBP-12A-UST1-4	10/13/11	10/18/11
MWBP-13-UST1-4	10/13/11	10/18/11
P6-MW-1	8/5/11	10/18/11

- October 6, 2011: ARCADIS performed a free product bail down test on well P2-SB-37 (Plant 2) and well UNK #14 (Plant 3). Approximately 1.14 feet (ft.) of LNAPL was removed from UNK #14 with no recharge. Approximately 0.59 ft. of LNAPL was removed from P2-SB-37. After 4 days approximately 40% (0.24 ft.) of the initial LNAPL thickness had recovered. A sample was collected from UNK #14 and analyzed for TPH GRO C-5 through C-10 and TPH DRO C-10 through C-34. A sample was collected from P2-SB-37 and analyzed for TCL VOCs, TCL SVOCs, TAL Metals and PCBs. Investigation Derived Waste (IDW) generated from the bail down tests was collected and stored on site in a UN1H2/Y30 approved 5 gallon high density polyethylene (HDPE) pale, with screw down lid, and properly labeled.
- October 10, 2011: A representative from The Environmental Quality Company (EQ) collected composite samples from the IDW drums at each of the plants. After completion of the RFI Work Plan Phase I investigation

activities the following IDW quantity of drums were generated at each of the plants;

- Plant 2: soil drums=17; liquid drums=11
- Plant 3: soil drums=13; liquid drums=12
- Plant 6: soil drums=12; liquid drums=14

EQ was contracted by ARCADIS for the removal and disposal of the IDW material. On October 12, 2011 ARCADIS was informed that the analytical results from the composite sample collected from the drums containing liquid at Plant 3 came back above 5 mg/L for chromium and was therefore considered characteristically hazardous for waste code D007.

Consequently, on October 20, 2011 ARCADIS collected grab samples from each of the twelve drums containing liquid at Plant 3. These samples were sent to Merit Labs for analysis of Total Chromium. The results of this sampling showed 4 of the drums above 5 mg/L for chromium. Therefore, these drums were disposed as an EPA RCRA characteristically hazardous waste for waste code D007. The remaining 8 drums were found to be non-detect for chromium, and were consequently disposed as non-hazardous.

- November 4, 2011: ARCADIS contracted with Fibertec to repair the existing groundwater monitoring wells previously located by ARCADIS but that could not be accessed and sampled.

The following wells were repaired at Plant 3:

- MW-91-1: Removed and replaced the existing concrete well pad and flush mount cover.
- UNK #11: Removed and replaced the existing concrete well pad and flush mount cover.
- MW-22: Used a vacuum extraction truck to remove debris from the well casing. J-plug installed in MW-22 was found to still be in good condition. Removed and replaced concrete well pad and flush mount cover.

The following wells were repaired at Plant 6:

- MW-03-05: Removed and replaced the existing concrete well pad and flush mount cover.
- MWBP-10-UST1-4: Removed and replaced the existing concrete well pad and flush mount cover.
- MWBP-10A-UST1-4: Removed and replaced the existing concrete well pad and flush mount cover.
- MWBP-11-UST1-4: Removed and replaced the existing concrete well pad and flush mount cover.

- MWBP-12-UST1-4: Removed and replaced the existing concrete well pad and flush mount cover.
- November 7, 2011: EQ was on site to remove and dispose of the IDW drums at each of the plants. The following IDW drums were removed and disposed:
 - Plant 2: 11 drums containing non-hazardous liquid and 16 drums containing non-hazardous solid waste.
 - Plant 3: 8 drums containing non-hazardous liquid, 4 drums containing hazardous liquid and 13 drums containing non-hazardous solid waste.
 - Plant 6: 14 drums containing non-hazardous liquid and 6 drums containing non-hazardous solid waste.

Copies of each of the manifest are provided at the end of this report.

- November 15, 2011: Surveyors were at the Sites to measure coordinate information on the soil borings completed during the Phase I Investigation and top of casing (TOC) information on the newly installed monitoring wells at Plant 2 and Plant 6. The surveyors also completed a metal detector sweep and staked the location on those wells ARCADIS was unable to visually locate during the initial well inventory completed September 19-20, 2011.
- November 17 and 18, 2011: Fibertec returned to the Sites to finish repairing the monitoring wells that could not be previously accessed and to complete a ground penetrating radar (GPR) survey in the areas of those wells that ARCADIS could not visually locate during the initial well inventory in September 2011. Fibertec also installed stick-up well covers and well pads on select temporary wells installed during the Phase I investigation.

Fibertec completed the following at Plant 2:

- P2-SB-6: Installed a stick-up well cover and concrete well pad around the temporary well casing installed during the Phase I investigation.
- P2-SB-37: Installed a stick-up well cover and concrete well pad around the temporary well casing installed during the Phase I investigation.

Fibertec completed the following at Plant 3:

- Monitoring well MW-2 was located. This well was originally identified as UNK #12 by ARCADIS. After collecting depth to water and total

depth of the well ARCADIS was able to identify the well as MW-2 based on review of historical data and site maps.

- Found monitoring well MW-88-1. Flush mount buried in the grass.
- Found monitoring wells MW-04-04. Flush mount buried in the grass.
- MW-4: Removed and replaced the existing concrete well pad and flush mount cover.
- MW-5: Removed and replaced the existing concrete well pad and flush mount cover.
- MW-6: Removed and replaced the existing concrete well pad and flush mount cover.
- MW-23: Removed and replaced the existing concrete well pad and flush mount cover.
- CH-14-RO: Installed a stick-up well cover and concrete well pad around the temporary well casing installed during the Phase I investigation.
- P3-SB-7: Installed a stick-up well cover and concrete well pad around the temporary well casing installed during the Phase I investigation.

Fibertec completed the following at Plant 6:

- Found monitoring well SME-MW-2. Well was found to be damaged with no flush mount cover or j-plug present.
 - Found monitoring well SME-MW-4. No flush mount cover, but j-plug still in well.
 - Found monitoring B-BP-14. Cover still present but well appeared to be abandoned. Casing filled in, no j-plug.
 - P6-SB-18: Installed a stick-up well cover and concrete well pad around the temporary well casing installed during the Phase I investigation.
 - P6-SB-32: Installed a stick-up well cover and concrete well pad around the temporary well casing installed during the Phase I investigation.
 - P6-SB-7: Installed a stick-up well cover and concrete well pad around the temporary well casing installed during the Phase I investigation.
 - P6-SB-21: Installed a stick-up well cover and concrete well pad around the temporary well casing installed during the Phase I investigation.
 - P6-SB-37: Installed a stick-up well cover and concrete well pad around the temporary well casing installed during the Phase I investigation.
- November 22, 2011 through December 2, 2011: ARCADIS completed groundwater development and sampling on the recently repaired monitoring

wells at Plants 2, 3 and 6. Samples collected from each well were analyzed for TCL VOCs, TCL SVOCs, TAL Metals and PCBs. The following is a list of wells sampled during this time:

Well ID	Date Developed	Date Sampled
PLANT 3		
MW-4	11/22/11	11/28/11
MW-5	11/22/11	11/28/11
MW-6	11/22/11	11/28/11
UNK #11	11/22/11	11/29/11
MW-23	11/22/11	11/29/11
MW-91-1	11/22/11	11/29/11
MW-22	11/22/11	11/29/11
PLANT 6		
MWBP-10-UST1-4	11/23/11	12/02/11
MWBP-10A-UST1-4	11/23/11	12/02/11
MW-03-05	11/23/11	12/02/11
MWBP-12-UST1-4	11/23/11	12/02/11
MWBP-11-UST1-4	11/23/11	11/29/11
MW-03-08	11/23/11	12/02/11

- December 23, 2011: EQ arrived on site to remove and dispose of the remaining IDW drums. The following IDW was removed:
 - Plant 2: 1 drum containing non-hazardous solid waste and 1 5-gallon pail containing TSCA regulated PCB waste.
 - Plant 3: 2 drums containing non-hazardous liquid.
 - Plant 6: 2 drums containing non-hazardous liquid and 6 drums containing non-hazardous solid waste.

Copies of each of the manifest are provided at the end of this report.

Problems Encountered

- Plant 2: Groundwater monitoring well OW-4 could not be located.
- Plant 3: Groundwater monitoring wells MW-21, MW-24, MW-05-02, MW-91-6, MW-93-2, MW-93-3 and MW-91-4 could not be located. Monitoring well MW-93-1 was located, but was dry and could not be sampled. Monitoring wells MW-04-04 and MW-88-1 were located during the GPR survey, but could not be relocated during sampling due to snow cover.
- Plant 6: Groundwater monitoring wells B-BP-3, MW-1, MW-2, MW-3, MW-4, MWBP-11A-UST5-6, MW-03-03, MW-04-02, MW-04-03, MW-04-04, OW-2 and OW-4 could not be located. Monitoring wells B-BP-14 and MWBP-13A-

UST1-4 were located, but appeared to be abandoned. Monitoring wells SME-MW-2 and SMW-MW-4 were located, but appeared to be compromised and were therefore not sampled.

Project Schedule – Near-Term Milestone Activities Anticipated During the Next Quarter

- RFI Phase I Activities Summary Report will be submitted to MDEQ by January 31, 2012.
- The RFI Work Plan Matrix Addendum for Phase II investigation activities will be completed and submitted to MDEQ during the 1st quarter of 2012.
- Phase II investigation activities are planned to begin during the 2nd quarter of 2012.

Estimated percent complete per budget tracking estimate tables

Task	Task Description	Target Completion Date	Percent Completed
Task 1	Work Plans Investigation, Reporting		
	Work Plan, QAPP, FSP	08/25/11	100
	Phase I RFI Implementation	4Q 2011	100
	Phase II RFI Implementation	2Q 2012	0
	Site Risk Assessment	4Q 2012	0
	RI/RFI Report	TBD	0
	Quarterly Reports (estimated 40 total reports)	2020	18
	EI 725 Report	01/02/2014	0
	EI 750 Report	01/02/2015	0
Task 2	Corrective Measures Reporting / RAP	12/31/2015	
Task 3	Free Product Recovery System Install/LTM Wells Install	TBD	0
Task 4	Free Product Recovery Systems OMM	TBD	0
Task 5	In-Situ Groundwater Treatment Implementation	TBD	0
Task 6	Groundwater Monitoring	TBD	0
Task 7	RCRA Cap	TBD	0
Task 8	RCRA Cap OMM	TBD	0
Task 9	Well and System Abandonment	TBD	0

Notes:

- TBD – To Be Determined

If you have any questions, please call me.
Sincerely,

ARCADIS



Amy L. Hoeksema, C.P.G.
Project Manager

Attachments:

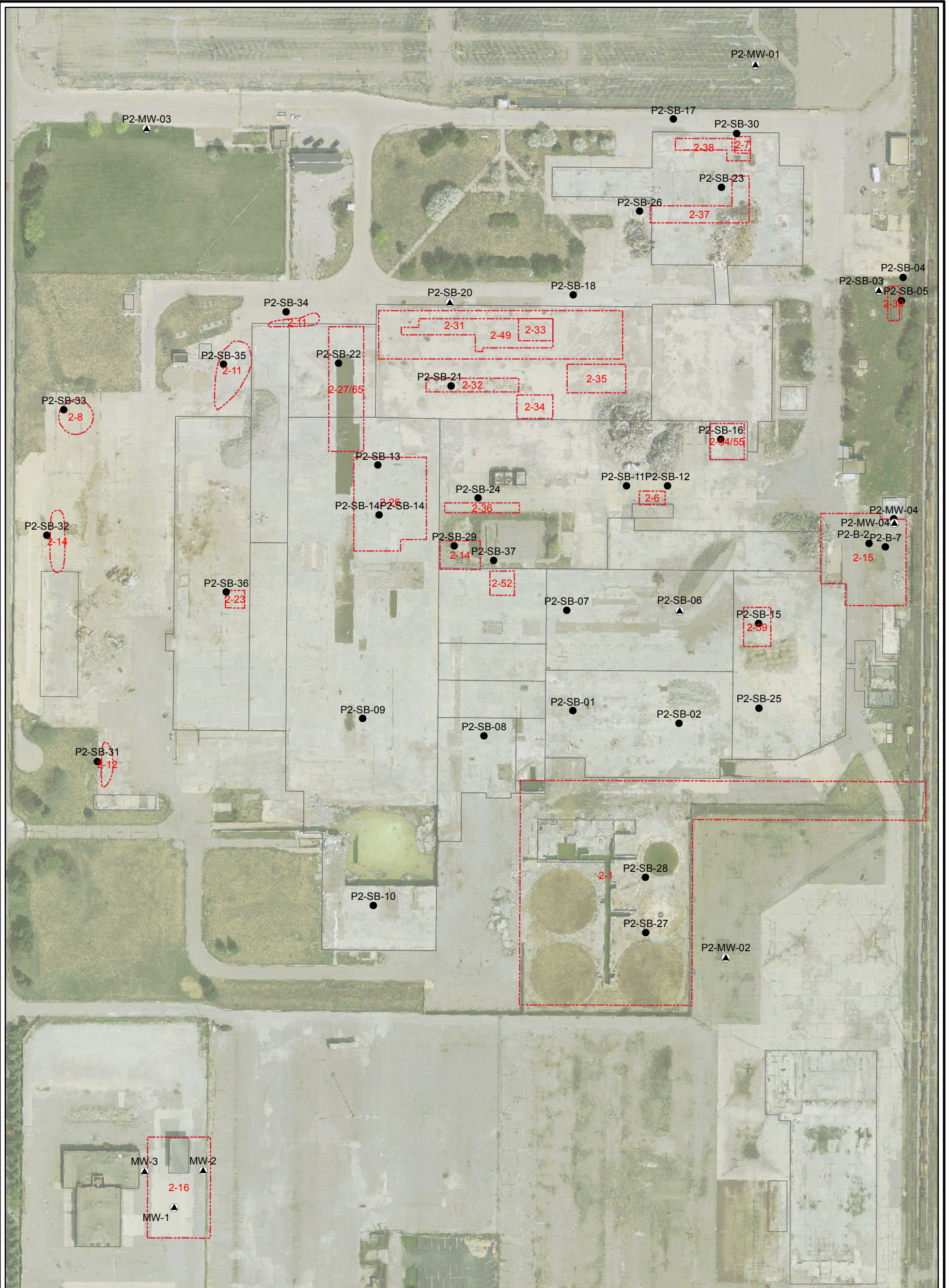
Plant 2 – Site Plan and Sample Location Map
Plant 3 – Site Plan and Sample Location map
Plant 6 – Site Plan and Sample Location Map
Plant 2 – IDW Manifests
Plant 3 – IDW Manifests
Plant 6 – IDW Manifests

Copies:

Joe Rogers (MDEQ)
John McCabe (MDEQ)
Deborah R. Mackenzie-Taylor (MDEQ)
Leonard Lipinski (MDEQ)
Grant Trigger (RACER)
Dave Favero (RACER)

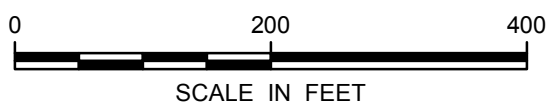


**Site Plan and Sample Location
Map – Plants 2, 3, & 6**



LEGEND

- ▲ MONITORING WELLS SAMPLED IN 2011
- 2011 SOIL BORINGS
- ▭ AREAS OF INTEREST
- ▭ FORMER BUILDING FOOTPRINT



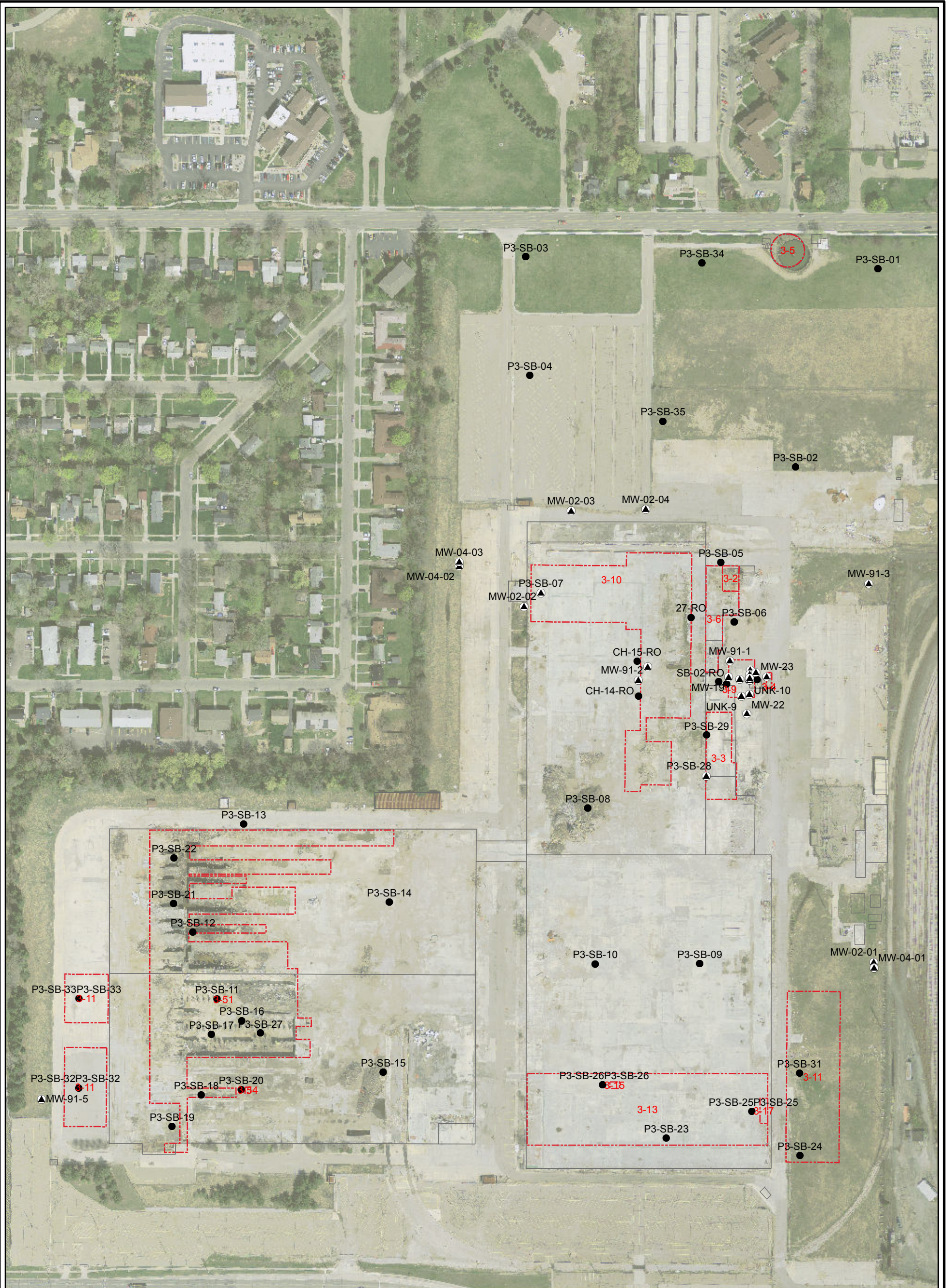
RACER Trust
Lansing, Michigan
Plant 2

**Site Plan and Sample
Location Summary - Plant 2**



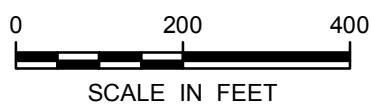
FIGURE

1



LEGEND

- ▲ MONITORING WELLS SAMPLED IN 2011
- 2011 SOIL BORINGS
- ▭ AREAS OF INTEREST
- ▭ FORMER BUILDING FOOTPRINT



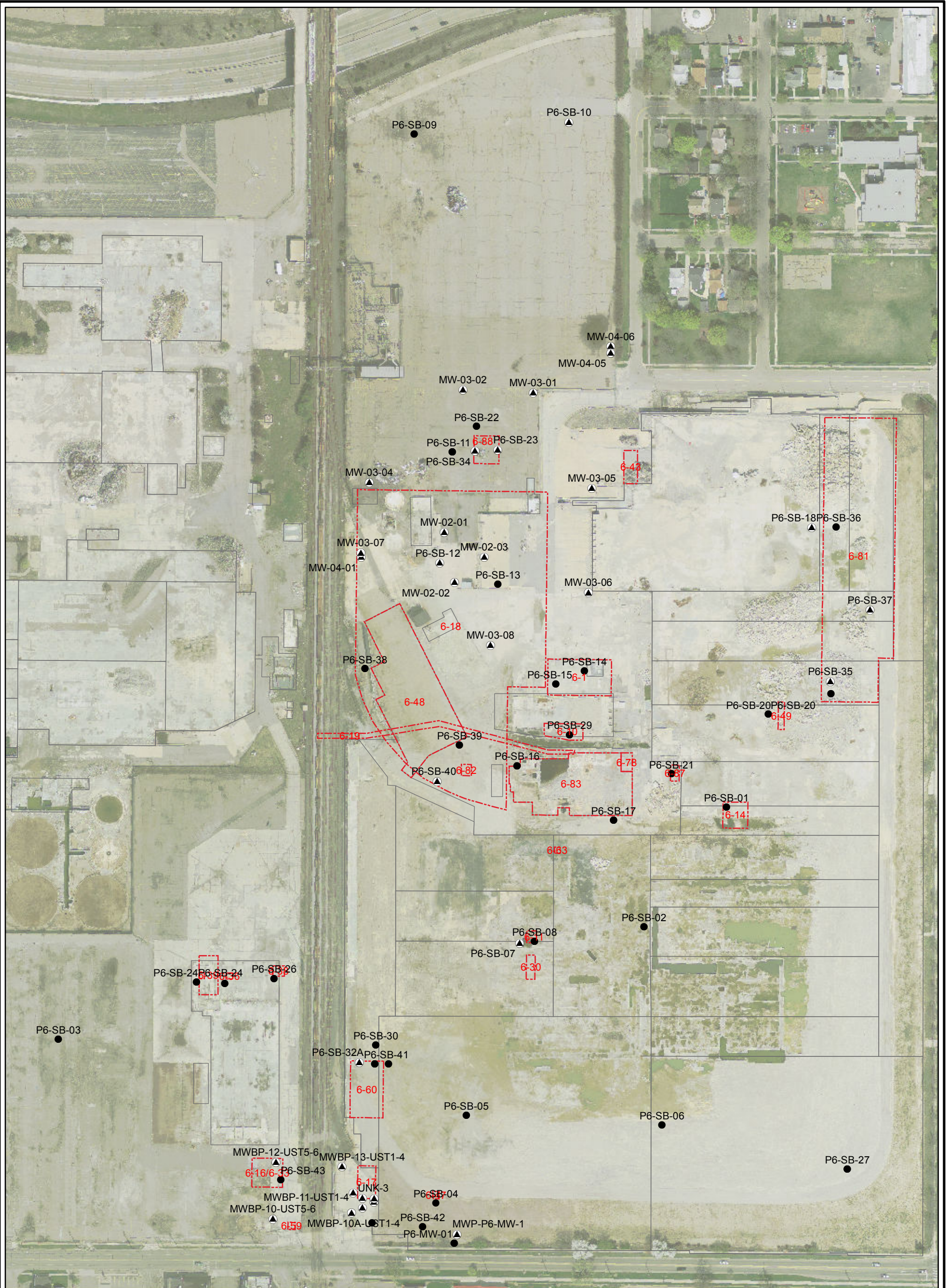
RACER Trust
Lansing, Michigan
Plant 3

**Site Plan and Sample
Location Summary - Plant 3**



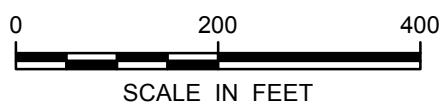
FIGURE

2



LEGEND

- ▲ MONITORING WELLS SAMPLED IN 2011
- 2011 SOIL BORINGS
- ▭ AREAS OF INTEREST
- ▭ FORMER BUILDING FOOTPRINT



RACER Trust
Lansing, Michigan
Plant 6

**Site Plan and Sample
Location Summary - Plant 6**



FIGURE

3



IDW Manifests – Plants 2, 3, & 6

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number MID 980 700 827	2. Page 1 of 1	3. Emergency Response Phone 313 347 1300	4. Manifest Tracking Number 008257834 JJK		
		5. Generator's Name and Mailing Address RACER TRUST 2930 ECORSE ROAD YPSILANTI, MI 48198 Generator's Phone: (313) 486-2908		Generator's Site Address (if different than mailing address) 2800 W SAGINAW LANSING, MI 48909			
6. Transporter 1 Company Name EQ INDUSTRIAL SERVICES				U.S. EPA ID Number MID 000 263 871			
7. Transporter 2 Company Name				U.S. EPA ID Number			
8. Designated Facility Name and Site Address EQ DETROIT, INC. 1923 FREDERICK DETROIT, MI 48211 Facility's Phone: (313) 347-1300				U.S. EPA ID Number MID 980 981 566			
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes	
		No.	Type				
	1. NON HAZARDOUS SOLID WASTE, NOT DOT NOT RCRA REGULATED	13	DM	1100	P		
	2. NON HAZARDOUS NON REGULATED LIQUID WASTE	2	DM	110	G	829L	
X	3. HAZARDOUS waste, liquid, n.o.s (CHROMIUM), 9. PGII, ERG #171	1	DM	1	G	0007	
	4.						
14. Special Handling Instructions and Additional Information 01 J117331DET / Non Haz Soil (plant #3) <i>DRIVER HAS EAG BOOK USA</i>							
15. 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. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.							
Generator's/Offeror's Printed/Typed Name <i>Ray March, on behalf of RACER</i>				Signature <i>Ray March</i>		Month Day Year <i>11 07 11</i>	
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____							
17. Transporter Acknowledgment of Receipt of Materials							
Transporter 1 Printed/Typed Name <i>Raymond Root</i>				Signature <i>Raymond Root</i>		Month Day Year <i>11 07 11</i>	
Transporter 2 Printed/Typed Name				Signature		Month Day Year	
18. Discrepancy							
18a. 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							
18b. Alternate Facility (or Generator) _____ U.S. EPA ID Number _____							
18c. Signature of Alternate Facility (or Generator) _____ Month Day Year _____							
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)							
1. NONE		2.		3.		4.	
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a							
Printed/Typed Name				Signature		Month Day Year	

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number MID 980 700 827	2. Page 1 of 1	3. Emergency Response Phone (313) 347-1300	4. Manifest Tracking Number 008257835 JJK	
5. Generator's Name and Mailing Address RACER TRUST 2930 ECORSE ROAD YPSILANTI, MI 48198		Generator's Site Address (if different than mailing address) 2801 W SAGINAW LANSING, MI 48909				
Generator's Phone: (313) 486-2806						
6. Transporter 1 Company Name EQ INDUSTRIAL SERVICES				U.S. EPA ID Number MID 000 263 871		
7. Transporter 2 Company Name				U.S. EPA ID Number		
8. Designated Facility Name and Site Address EQ DETROIT, INC. 1923 FREDERICK DETROIT, MI 48211		U.S. EPA ID Number MID 980 991 566				
Facility's Phone: (313) 347-1300						
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
		No.	Type			
	1. NON HAZARDOUS NON REGULATED LIQUID WASTE	11	DM	605	G	029L
	2. NON HAZARDOUS SOLID WASTE, NOT DOT NOT RCRA REGULATED	10	DM	11000	P	
	3.					
	4.					
14. Special Handling Instructions and Additional Information 01. J117330DET / Non Haz Waste (plant #1) 02. J117328DET / Non Haz Soil (plant #2)						
15. 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. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.						
Generator's/Offeror's Printed/Typed Name Liz Marsh, on behalf of RACER				Signature <i>Liz Marsh</i>		Month Day Year 11 07 11
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____						
17. Transporter Acknowledgment of Receipt of Materials						
Transporter 1 Printed/Typed Name Raymond Root				Signature <i>Raymond Root</i>		Month Day Year 11 07 11
Transporter 2 Printed/Typed Name				Signature		Month Day Year
18. Discrepancy						
18a. 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:						
18b. Alternate Facility (or Generator) U.S. EPA ID Number						
Facility's Phone:						
18c. Signature of Alternate Facility (or Generator)						Month Day Year
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)						
1. LIW	2. NONE	3.	4.			
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in item 18a						
Printed/Typed Name				Signature		Month Day Year

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number MID 005 356 928	2. Page 1 of 1	3. Emergency Response Phone (313) 347-1300	4. Manifest Tracking Number 008257833 JJK		
		5. Generator's Name and Mailing Address RACER TRUST 2930 ECORSE ROAD ATTN: GRANT TRIGGER YPSILANTI, MI 48198		Generator's Site Address (if different than mailing address) 401 NORTH VERLINDEN STREET LANSING, MI 48909			
6. Transporter 1 Company Name EQ INDUSTRIAL SERVICES		U.S. EPA ID Number MID 000 263 871		7. Transporter 2 Company Name U.S. EPA ID Number			
8. Designated Facility Name and Site Address EQ DETROIT, INC. 1923 FREDERICK DETROIT, MI 48211		Facility's Phone: (313) 347-1300		U.S. EPA ID Number MID 980 901 506			
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes	
		No.	Type				
	1. NON HAZARDOUS NON REGULATED LIQUID WASTE	14	DM	770	G	B20L	
	2. NON HAZARDOUS SOLID WASTE, NOT DOT NOT RCRA REGULATED	12 6	DM	4200	P		
	3.						
	4.						
14. Special Handling Instructions and Additional Information 01. J117333DET / Non Haz Water (Plant #6) 02. J117333DET / Non Haz Soil (plant #6)							
15. 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. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.							
Generator's/Offoror's Printed/Typed Name Liz Marsh, on behalf of RACER		Signature <i>Liz Marsh</i>		Month 11		Day 07	
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S.		Port of entry/exit:		Date leaving U.S.:			
17. Transporter Acknowledgment of Receipt of Materials							
Transporter 1 Printed/Typed Name Raymond Root		Signature <i>Raymond Root</i>		Month 11		Day 07	
Transporter 2 Printed/Typed Name		Signature		Month		Day	
18. Discrepancy							
18a. 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							
18b. Alternate Facility (or Generator) Manifest Reference Number: U.S. EPA ID Number							
18c. Signature of Alternate Facility (or Generator) Month Day Year							
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)							
1. LIW		2. NONE		3.		4.	
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a							
Printed/Typed Name		Signature		Month		Day	

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number MID 980 700 827	2. Page 1 of 1	3. Emergency Response Phone (313) 347-1300	4. Manifest Tracking Number 008255683 JJK	
5. Generator's Name and Mailing Address RACER TRUST 2930 ECORSE ROAD YPSILANTI, MI 48198 Generator's Phone: (313) 486-2909			Generator's Site Address (if different than mailing address) 2801 W SAGINAW LANSING, MI 48909			
6. Transporter 1 Company Name EQ INDUSTRIAL SERVICES				U.S. EPA ID Number MID 000 283 871		
7. Transporter 2 Company Name				U.S. EPA ID Number		
8. Designated Facility Name and Site Address EQ DETROIT, INC. 1923 FREDERICK DETROIT, MI 48211 Facility's Phone: (313) 347-1300				U.S. EPA ID Number MID 980 991 568		
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit WT./Vol.	13. Waste Codes
		No.	Type			
	1. NON HAZARDOUS SOLID WASTE, NOT DOT NOT RCRA REGULATED	1	DM	800	P	
	2.					
	3.					
	4.					
14. Special Handling Instructions and Additional Information 1117329DET / Non Haz Soil (plant #2) TR12451						
15. 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. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.						
Generator's/Offoror's Printed/Typed Name Elizabeth A. Marsh, on behalf of RACER				Signature Elizabeth A. Marsh		Month Day Year 12 23 11
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____ Transporter signature (for exports only): _____						
17. Transporter Acknowledgment of Receipt of Materials						
Transporter 1 Printed/Typed Name DAYLE BLAIR				Signature Dayle Blair		Month Day Year 12 23 11
Transporter 2 Printed/Typed Name				Signature		Month Day Year
18. Discrepancy						
18a. 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: _____						
18b. Alternate Facility (or Generator)				U.S. EPA ID Number		
Facility's Phone: _____						
18c. Signature of Alternate Facility (or Generator)						Month Day Year
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)						
1. NONE		2.		3.		4.
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a						
Printed/Typed Name				Signature		Month Day Year

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number MID 005 358 928	2. Page 1 of 1	3. Emergency Response Phone (313) 347-1300	4. Manifest Tracking Number 008255682 JJK		
5. Generator's Name and Mailing Address RACER TRUST 2830 ECORSE ROAD ATTN: GRANT TRIGGER YPSILANTI, MI 48198			Generator's Site Address (if different than mailing address) 401 NORTH VERLINDEN STREET LANSING, MI 48909				
Generator's Phone: (313) 486-2008							
6. Transporter 1 Company Name EQ INDUSTRIAL SERVICES			U.S. EPA ID Number MID 000 263 871				
7. Transporter 2 Company Name			U.S. EPA ID Number				
8. Designated Facility Name and Site Address EQ DETROIT, INC. 1923 FREDERICK DETROIT, MI 48211			U.S. EPA ID Number MID 980 991 566				
Facility's Phone: (313) 347-1300							
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes	
		No.	Type				
	1. NON HAZARDOUS NON REGULATED LIQUID WASTE	2		110	g	D291	
	2. NON HAZARDOUS SOLID WASTE, NOT DOT NOT RCRA REGULATED	60		4800	lb		
	3.						
	4.						
14. Special Handling Instructions and Additional Information 1. J117332DET / Non Haz Waste (Plant #6) 2. J117333DET / Non Haz Sol (plant #6) TR 12451							
15. 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. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.							
Generator's/Offoror's Printed/Typed Name Elizabeth A Marsh on behalf of RACER			Signature Elizabeth@thawk		Month 12	Day 23	Year 11
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____							
17. Transporter Acknowledgment of Receipt of Materials							
Transporter 1 Printed/Typed Name DAVID BLAIR			Signature David Blair		Month 12	Day 23	Year 11
Transporter 2 Printed/Typed Name			Signature		Month	Day	Year
18. Discrepancy							
18a. 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: _____							
18b. Alternate Facility (or Generator)					U.S. EPA ID Number		
Facility's Phone: _____							
18c. Signature of Alternate Facility (or Generator)					Month	Day	Year
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)							
1. LW	2. NONE	3.	4.				
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a							
Printed/Typed Name			Signature		Month	Day	Year

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number MID 980 700 827	2. Page 1 of 1	3. Emergency Response Phone (313) 347-1300	4. Manifest Tracking Number 008255681 JJK		
5. Generator's Name and Mailing Address RACER TRUST 2930 ECORSE ROAD YPSILANTI, MI 48196 Generator's Phone: (313) 489-2000			Generator's Site Address (if different than mailing address) 2800 W SAGINAW LANSING, MI 48909				
6. Transporter 1 Company Name EQ INDUSTRIAL SERVICES				U.S. EPA ID Number MID 000 263 871			
7. Transporter 2 Company Name				U.S. EPA ID Number			
8. Designated Facility Name and Site Address EG DETROIT, INC. 1923 FREDERICK DETROIT, MI 48211 Facility's Phone: (313) 347-1300			U.S. EPA ID Number MID 980 991 566				
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes	
		No.	Type				
	1. NON HAZARDOUS NON REGULATED LIQUID WASTE	2	DM	110	G	D09L	
	2.						
	3.						
	4.						
14. Special Handling Instructions and Additional Information K117105DET / Non Haz Waste (plant #3)							
15. 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. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.							
Generator's/Offeror's Printed/Typed Name Elizabeth A. Marsh, of RACER TRUST			Signature Elizabeth A Marsh		Month 12	Day 23	Year 11
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____							
17. Transporter Acknowledgment of Receipt of Materials							
Transporter 1 Printed/Typed Name			Signature		Month	Day	Year
Transporter 2 Printed/Typed Name			Signature		Month	Day	Year
18. Discrepancy							
18a. 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: _____							
18b. Alternate Facility (or Generator)					U.S. EPA ID Number		
Facility's Phone: _____							
18c. Signature of Alternate Facility (or Generator)					Month	Day	Year
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)							
1.	2.	3.	4.				
1.	LW						
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a							
Printed/Typed Name			Signature		Month	Day	Year

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number MID 980 700 827	2. Page 1 of 1	3. Emergency Response Phone (313) 347-1300	4. Manifest Tracking Number 008255684 JJK			
5. Generator's Name and Mailing Address RACER TRUST 2930 ECORSE ROAD YPSILANTI, MI 48198		Generator's Site Address (if different than mailing address) 2801 W SAGINAW LANSING, MI 48909						
Generator's Phone: (313) 486-2016					U.S. EPA ID Number MID 000 283 871			
6. Transporter 1 Company Name EQ INDUSTRIAL SERVICES					U.S. EPA ID Number			
7. Transporter 2 Company Name					U.S. EPA ID Number			
8. Designated Facility Name and Site Address VEOLIA ENV SVCS LLC TECHNICAL SOLUTIO HWY 73, 3.5 MILES WEST OF TAYLORS BAYOU PORT ARTHUR, TX 77640					U.S. EPA ID Number TXD 000 838 898			
Facility's Phone: (409) 736-2821								
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit WL/Vol.	13. Waste Codes		
		No.	Type					
x	1. RQ. UN2315, Polychlorinated biphenyls, liquid, 9. PGII, ERG #171	1	DF	2.2	K	0261	0043	0029
						0018	0026	0039
	2.							
	3.							
	4.							
14. Special Handling Instructions and Additional Information i. PTAVESIGTS / 243250 Free Product LNAPL / Storage Start Date 08/11/11, Container Id Number P2-PALC-1								
15. 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. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.								
Generator's/Offoror's Printed/Typed Name Elizabeth A Marsh				Signature <i>Elizabeth A Marsh</i>		Month 12	Day 23	Year 11
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____								
17. Transporter Acknowledgment of Receipt of Materials								
Transporter 1 Printed/Typed Name DAYLE BLAIR				Signature <i>Dayle Blair</i>		Month 12	Day 23	Year 11
Transporter 2 Printed/Typed Name				Signature		Month	Day	Year
18. Discrepancy								
18a. 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:								
18b. Alternate Facility (or Generator)						U.S. EPA ID Number		
Facility's Phone:								
18c. Signature of Alternate Facility (or Generator)						Month	Day	Year
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)								
1.		2.		3.		4.		
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in item 18a								
Printed/Typed Name				Signature		Month	Day	Year



Land Disposal Restriction & Certification Form

Please check the appropriate facility:

<input type="checkbox"/>	Clean Harbors El Dorado, LLC	309 American Circle, El Dorado, AR 71730	EPA ID # ARD 069 748 192
<input type="checkbox"/>	VonRoll America, Inc. (WTD)	1230 Saint George St, East Liverpool, OH 43920	EPA ID # OHD 980 613 341
<input checked="" type="checkbox"/>	Veolia ES Technical Solutions, LLC	Hgwy 73 (3.3 Mi W of Taylor Bayou), Port Arthur, TX 77640	EPA ID # TXD 000 838 896
<input type="checkbox"/>	Ross Incineration Services	36790 Giles Road, Grafton, OH 44044	EPA ID #OHD 048 415 665
<input type="checkbox"/>	Veolia ES Technical Solutions, LLC	7 Mobile Ave, Saugat, IL 62201	EPA ID # ILD 098 642 424

Generator Name: RACER TRUST U.S. EPA ID No.: MID980700827

Generator Address: 2801 W SAGINAW LANSING, MI 48909

Manifest Doc. No.:

Instructions

- Column 1: Identify all U.S. EPA hazardous waste codes that apply to this waste shipment.
- Column 2: Choose the appropriate treatability group: Non-Wastewater (NWW) or Wastewater (WW).
- Column 3: Enter the appropriate Subcategory, if applicable, and also enter "Contaminated Soil" or "Debris" if the waste will be treated using one of the alternative treatment technologies provided by 268.49 (c) - soil, or 268.45 - debris.
- Column 4: Enter the letter of the appropriate paragraph from pages 1-2 of this form.
- Column 5: For F001 - F005, F039, D001 - D043, Debris and Contaminated Soil: please enter the Reference Number(s) for any constituents in your waste stream subject to treatment. The Reference Number(s) can be found in the EQ Resource Guide, LDR/UHC Constituent Table.

Manifest Line Item	U.S. EPA Hazardous Waste Code (s)	NWW or WW	Subcategory	How Must the Waste be Managed?	Reference Number(s) of Hazardous Constituents contained in the waste. Complete for F001-F005, F039, D001-D043, Soil and Debris wastes.
9-1	026L, D043, D029, D018, D028, D039, D040	NWW		A	
9-2					
9-3					
9-4					

I hereby certify that all information submitted on this and all associated documents is complete and accurate to the best of my knowledge and information.

Generator Signature: Elizabeth A Marsh Title: Sr. Engineer, on behalf of
 Printed Name: Elizabeth A Marsh Date: 12/23/11 RACER

How Must the Waste Be Managed?

THIS CONTAMINATED SOIL DOES / DOES NOT CONTAIN LISTED HAZARDOUS WASTE AND DOES / DOES NOT EXHIBIT A
 (CIRCLE ONE) (CIRCLE ONE)
CHARACTERISTIC OF HAZARDOUS WASTE AND IS SUBJECT TO / COMPLIES WITH THE SOIL TREATMENT STANDARDS
 (CIRCLE ONE)

AS PROVIDED BY 268.49(c) OR THE UNIVERSAL TREATMENT STANDARDS. I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification and believe that it has been maintained and operated properly so as to comply with treatment standards specified in 40 CFR 268.49 without impermissible dilution of the prohibited wastes. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment.