



**CONESTOGA-ROVERS
& ASSOCIATES**

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August 8, 2012

Reference No. 007878

Ms. Jean Greensley
Project Manager
U.S. EPA, Region 5
Land and Chemicals Division
77 West Jackson Boulevard LU-9J
Chicago, Illinois
U.S.A. 60604-3507

Dear Ms. Jean Greensley:

Re: Request for Risk-Based Disposal Approval Pursuant to 40 CFR 761.61(c)
RACER Former Saginaw Malleable Iron Plant

RACER Trust is requesting approval for concrete exhibiting concentrations of polychlorinated biphenyl (PCB) less than or equal to 10 milligram per kilogram (mg/kg) remain on-Site pursuant to 40 CFR 761.61(c) – *Risk-based disposal approval*. Concrete exhibiting concentrations of PCBs equal to or less than 10 mg/kg is present in the concrete slab at the former Saginaw Malleable Iron Plant in Saginaw Michigan. This letter provides notification in accordance with 40 CFR 761.61 (a)(3).

The remedial activities proposed include removal and off-Site disposal of concrete with PCB concentrations greater than 10 mg/kg and management of remaining concentrations by restricting access and institutional controls. PCB impacted concrete above 10 mg/kg is proposed to remain in one area, the Melting Department Area (Figure 1). The PCB impacted concrete above 10 mg/kg is approximately 15-20 feet below the surface (fbs) of the slab and is encapsulated below 15-20 ft of flowable fill and capped with 6 inches of concrete. In addition there are three surficial concrete samples marginally above 10 mg/kg also identified in the Melting Department Area, which are intended to remain. PCB impacted soil above 10 mg/kg is also proposed to remain in two areas, the Melting Department Area and the I27.7 area. The PCB impacted soil is located below a minimum of 6-inches of concrete.

The remainder of the letter provides the following information:

- Nature of contamination including kinds of materials contaminated
- Procedures used to sample contaminated and adjacent areas and a site map showing PCB concentrations measured in all pre-cleanup characterization samples
- Location and extent of the PCB impacted area
- Remedial plan for PCB impacts at the site including approach, schedule, and disposal facilities



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- Written Certification as required by 40 CFR 761.61(a)(3)(E)

1.0 BACKGROUND

The Site consists of approximately 150 acres located along the Saginaw River adjacent to the southern boundary of the City of Saginaw, Michigan, as shown on Figure 1. The former SMI Plant occupied an area of approximately 1 million square feet (23 acres).

Operations at the facility consisted of activities associated with casting and heat treating iron. The SMI Plant had historically used PCBs and PCB items in several applications including transformers, capacitors, switch gear, hydraulic systems, kiln seals, and fluorescent light ballasts. Releases of PCBs to the concrete occurred during those standard Plant operations.

Decommissioning of the SMI Plant was initiated in 2006 and was completed in December 2010. The concrete floor slab is all that remains following the decommissioning activities.

2.0 PREVIOUS INVESTIGATIONS

The following section presents previous investigations and sample results related to PCBs in the concrete floor slab. The activities have been divided into two main groupings, historical (pre-2006) and recent (2006 to 2011). Historical concrete samples were collected and analyzed for PCBs in various locations at the Plant between 1998 and 2003 to provide adequate and relevant due care information prior to executing various Plant activities. Plant activities included installing, replacing, and moving machinery as a part of manufacturing operations.

More recently, between 2006 and 2011, extensive sampling of the concrete was conducted as part of decommissioning activities. The entire data set representing remaining PCB concentrations in the concrete floor slab will be used for remedy determination. A total number of 797 concrete samples were collected and analyzed for PCBs.

2.1 MELTING DEPARTMENT

Historical uses of PCBs in the former Melting Department Area portion of the plant included but are not limited to hydraulic oils, capacitors, and transformers. PCB use in the former Melting Department Area for the operation of induction and melting furnaces spanned over 5 years until PCB-containing hydraulic oil was replaced with non-PCB hydraulic oil in the early to mid 1970s. Figure 1 presents the location of the Former Melting Department Area.



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General Motors (previous owner) conducted a PCB investigation and remediation in the Melting Department Area between 1993 and 1996. The investigation involved identifying the extent of PCBs with bulk and wipe samples collected in each electrical room associated with the five furnaces. It is important to note that a portion of the Melting Department Area was located in the former basement of the former Plant. As a result of the investigation, in areas where PCB concentrations from the lower depth intervals (i.e., concrete adjacent to underlying soil) posed a potential migration threat, PCBs were excavated (soil and concrete). The areas where no potential migration threat was identified or where the exposure was considered low due to limited accessibility, were cleaned (removed bulk solids from floor, washed walls, and floor with high pressure water and low foaming non ionic liquid alkaline cleaner), rinsed, and encapsulated. Confirmatory wipe, core, and soil samples were collected between December 1995 and December 1996. In a portion of the basement PCBs in concrete were left in place because of the risk to the structural integrity of the building if the PCB impacted concrete was removed. PCBs in concrete were left in place and the basement was backfilled to the elevation of the main floor to contain the area. There were five separate areas (numbered 1 through 5) within the Melting Department Area that were comprised of the following components: capacitor room, control room, generator room, transformer room, hydraulic room, buss tunnel to pit, pit, and hall. The majority of PCBs in concrete left in place were located in the basement level (buss tunnel, buss tunnel to pit, and pit) within areas one and two. Seven surficial wall samples exhibiting concentrations ranging from 12 mg/kg to 500 mg/kg and seven surficial floor samples exhibiting concentrations ranging from 14 mg/kg to 1,700 mg/kg were left in place within an approximate area of 120 ft by 60 ft. In addition three main floor concrete samples in Area 1 were left in place exhibiting concentrations ranging from 11 mg/kg to 18 mg/kg.

As part of the Melting Department Area remediation, hydraulic room #2 was investigated and found to be impacted with PCBs in concrete and soil. The concrete floor was removed and replaced and soil was removed to a depth of 5-feet and replaced with clean fill. Two verification samples were collected following the concrete and soil removal. One of the two verification results was above 10 mg/kg at 41 mg/kg (S1188). See Figure 2 for the location of soil verification sample S1188.

A report entitled, "Melting Department Area Investigation and Remediation Report" was submitted to the Michigan Department of Environmental Quality (MDEQ) and U.S. EPA in April 1997 summarizing the work completed in the Melting Department Area.



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2.2 I27.7 AREA

In 1971, a transformer leaked PCB oil in the I27.7 area when it was dropped during installation. The accident resulted in the loss of the transformer oils onto the plant floor. Based on discussions with plant personnel who were present at that time, the oil collected in a small area of exposed soil around a column where no concrete was present. The exposed soil was covered with concrete in 1972.

Two concrete cores were completed in this area on October 23, 1997. The results of the concrete analysis were non-detect (0.33 mg/kg) with the exception of the bottom portion of one of the concrete cores which reported total PCBs at 1.9 mg/kg. One sample was collected from the soil beneath each concrete core. The soil samples had detectable levels of total PCBs of 5.7 mg/kg and 540 mg/kg. These results are consistent with the available information indicating that the concrete was placed after the spill.

A total of 11 soil borings were completed on January 16, 1998 (5) and April 14/15 (6), respectively, in the I27.7 manhole area to assist in delineating the extent of impacted soil. Soil borings were advanced to depths ranging from 6.5 feet to 15 feet below ground surface. The locations of the soil borings are presented on Figure 2.

2.3 HISTORICAL INVESTIGATIONS (PRE-2006)

A total of 515 concrete samples were analyzed for PCBs between 1998 and 2003 representing 337 sample locations. The following summarized the results:

- >50 mg/kg PCBs - 23 samples results (maximum concentration 106 mg/kg)
- >10 mg/kg and ≤50 mg/kg - 21 samples results
- ≤10 mg/kg - 471 sample results including 182 non-detects

2.4 RECENT INVESTIGATIONS (2006-2011)

Decommissioning activities were initiated in 2006 and completed in December 2010. A Facility Environmental Assessment (FEA) was conducted between December 2006 and January 2007 and identified PCBs in the concrete floor slab. The FEA included sampling areas of environmental interest including stained concrete floors. An additional sampling event was conducted between June 12 and June 25, 2007 to further investigate the PCB detections from the FEA. Various media were sampled and analyzed for PCBs including samples from walls and



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floors. Various iterations of delineation were conducted between February 2008 and October 2011 as the scope for what concrete was to be removed was adjusted. Twelve samples contained PCB concentrations greater than 50 mg/kg. Thirty seven samples contained PCB concentrations greater than 10 mg/kg and less than or equal to 50 mg/kg. Two hundred and thirty-three samples contained concentrations less than or equal to 10 mg/kg, including three samples reported as non-detect.

2.5 SUMMARY

In summary, PCB concentrations in concrete greater than 50 mg/kg were reported in 35 samples. PCB concentrations in concrete greater than 10 mg/kg and less than or equal to 50 mg/kg were reported in 58 samples. Seven hundred and four samples contained concentrations of PCBs in concrete less than or equal to 10 mg/kg, including 185 samples reported as non-detect.

Figures 3 presents databoxes summarizing the locations where PCBs in concrete were reported greater than or equal to 10 mg/kg.

3.0 REMEDIAL ACTIVITIES

3.1 PROPOSED END-USE

In order to identify the potential risks associated with the Site, the end-use must be contemplated to identify potential exposures. RACER is proposing to remove impacted concrete with PCBs greater than 10 mg/kg for off-Site disposal and restoration of areas where concrete is removed with concrete, maintaining the remainder of the slab in place, maintain the Site fencing, and restrict future uses to industrial in nature, which will result in minimal potential for exposure. For purposes of the remediation activities, RACER conservatively assumes that the area of the concrete floor slab will meet the definition of a "Low Occupancy Area" which is defined in 40 CFR 761.3 as,

"Any area where PCB remediation waste has been disposed of on-site and where occupancy for any individual not wearing dermal and respiratory protection for a calendar year is: ...less than 335 hours (an average of 6.7 hours per week) for bulk PCB remediation waste"

The Low Occupancy Area standards are defined in 40 CFR 761.61(a)(4)(i)(B) as,

"(1) The cleanup level for bulk PCB remediation waste in low occupancy areas is ≤ 25 ppm ...



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(2) Bulk PCB remediation wastes may remain at a cleanup site at concentrations >25 ppm and ≤50 ppm if the site is secured by a fence and marked with a sign including the ML mark.

(3) Bulk PCB remediation wastes may remain at a cleanup site at concentrations >25 ppm and ≤100 ppm if the site is covered with a cap meeting the requirements of paragraphs (a)(7) and (a)(8) of this section."

The High Occupancy Area standards are defined in 40 CFR 761.61(a)(4)(i)(A) as,

"(1) The cleanup level for bulk PCB remediation waste in high occupancy areas is ≤1 ppm ...

(2) Bulk PCB remediation wastes may remain at a cleanup site at concentrations >1 ppm and ≤10 ppm if the site is covered with a cap meeting the requirements of paragraphs (a)(7) and (a)(8) of this section."

3.2 PROPOSED REMEDIAL ACTIVITY

For the areas reporting elevated PCBs in concrete (select areas greater than 10 mg/kg), RACER proposes select removal of concrete. PCBs in concrete have been horizontally delineated to 10 mg/kg, with the exception of the Melting Department Area. Figures 4, 5 and 6 present the areas of proposed concrete removal. Areas on the figures highlighted in magenta will be excavated and disposed of as TSCA (>50 ppm PCBs) waste and areas highlighted in cyan will be excavated and disposed of as non-TSCA (<50 ppm PCBs) waste.

Excavated concrete will be disposed of off Site at an appropriate facility. Excavated areas will be restored with a minimum of 6 inches of concrete.

The following disposal facilities are proposed:

1. TSCA Waste (PCBs greater than or equal to 50 mg/kg)
Wayne Disposal, Inc. Site #2 Landfill
49350 N. I-94 Service Drive, Belleville, MI 48111
EPA ID# MID 00072483
2. Non-TSCA Waste (PCBs less than 50 mg/kg)
Peoples Landfill - Birch Run
4143 Rathburn Road, Birch Run, MI 48415

Figure 1 presents a summary of the remaining PCBs in surficial concrete, following the proposed remediation.



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3.3 COMPLETED REMEDIAL ACTIVITY - MELTING DEPARTMENT AREA

For the Melting Department Area, RACER reviewed the locations with PCB concentrations greater than 100 mg/kg (C169A [230 mg/kg], C165A [710 mg/kg], C175A [500 mg/kg], C161A [1700 mg/kg], C173A [230 mg/kg] and C171A [350 mg/kg]). The elevated PCB concentrations from these locations were addressed in the Melting Department Area Investigation and Remediation Report submitted to U.S. EPA. These locations were part of the Power Supply 2, specifically part of the Pit 2 and the BUSS Tunnel to Pit 2 and they were located in the former basement of the building 15 to 20 ft below the floor slab. In April 1997, as a part of remediation, the Pit 2 and the BUSS Tunnel to Pit 2 were filled with flowable fill (approximately 20 ft thick) and capped with 6 inches of concrete. This remedy preserved the structural integrity of the building and by the floor encapsulation, effectively eliminated the workers contact with remaining PCBs. The Melting Department Area Investigation and Remediation Report summarized the work and was submitted to U.S. EPA in April 1997. At this time, the PCBs remaining at depth under the concrete slab do not pose an unacceptable risk and RACER proposes leaving them in place.

The location (C191A) that exhibits a marginal exceedance (130 mg/kg) of the Low Occupancy with a cap standard (greater than 25 mg/kg and less than or equal to 100 mg/kg) is situated in the Power Supply 5, specifically in the BUSS Tunnel to Pit 5. The BUSS Tunnel was remediated in November 1996 (floors and walls were scraped, scrubbed, power washed, cleaned, rinsed, and encapsulated) as it was part of the Melting Department Area. The basement has been filled with clean fill (approximately 20 ft) and covered with 6-inches of concrete. At this time, the PCBs remaining at depth under the concrete slab do not pose and unacceptable risk and RACER proposes leaving them in place.

3.4 DEED RESTRICTIONS

Deed restrictions will be placed on the remaining PCB-impacted areas as required, consistent with 40 CFR 761.61(a)(8). The deed restriction will designate the areas of the property where impacted concrete remains and will consider re-development of the property. Figure 7 presents the areas where deed restrictions will be placed on the concrete slab.



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4.0 CERTIFICATION

The certification statement required under 40 CFR 761.61(a)(3)(E) is provided in Attachment A.

5.0 SCHEDULE

A contractor has been selected to complete the concrete removal and will conduct the work as soon as practicable pending U.S. EPA approval.

Should you have any questions, please do not hesitate to contact us.

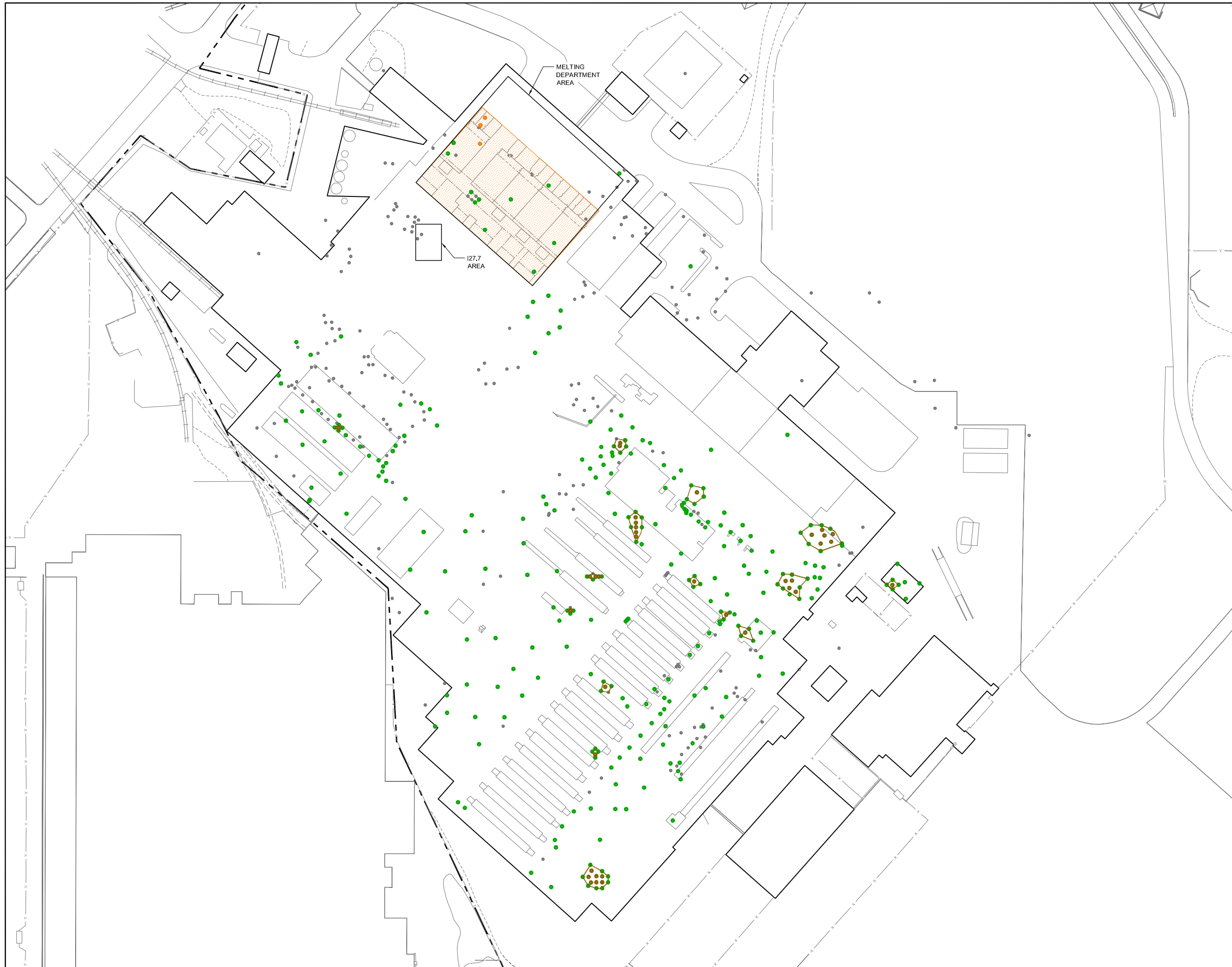
Yours truly,

CONESTOGA-ROVERS & ASSOCIATES

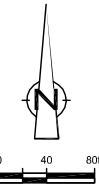
JEP/kf/1

Encl.

cc: Peter Ramanauskas, U.S. EPA
Sue Kaelber-Matlock, MDEQ
Dave Favero, RACER
Grant Trigger, RACER
Lisa Coffey, Arcadis



No.	Revision	Date	Initial



- LEGEND**
- RACER SAGINAW MALLEABLE IRON PLANT PROPERTY LINE (APPROX.)
 - BUILDING OUTLINE
 - x- FENCE LINE
 - PREVIOUSLY REMEDIATED
 - SHALLOW CONCRETE SAMPLE LOCATION (> 10 mg/kg PCB)
 - SHALLOW CONCRETE SAMPLE LOCATION (DETECTED TO 10 mg/kg PCB)
 - SHALLOW CONCRETE SAMPLE LOCATION (NON-DETECT PCB)
 - SHALLOW CONCRETE SAMPLE LOCATION PROPOSED FOR EXCAVATION
 - PROPOSED EXCAVATION LIMITS

NOTE: SHALLOW CONCRETE SAMPLE LOCATIONS ARE FROM SURFACE TO VARYING DEPTHS (½ INCH TO 6 INCHES).

SCALE VERIFICATION
THIS BAR MEASURES 1" ON ORIGINAL. ADJUST SCALE ACCORDINGLY.

Approved

DRAWING STATUS

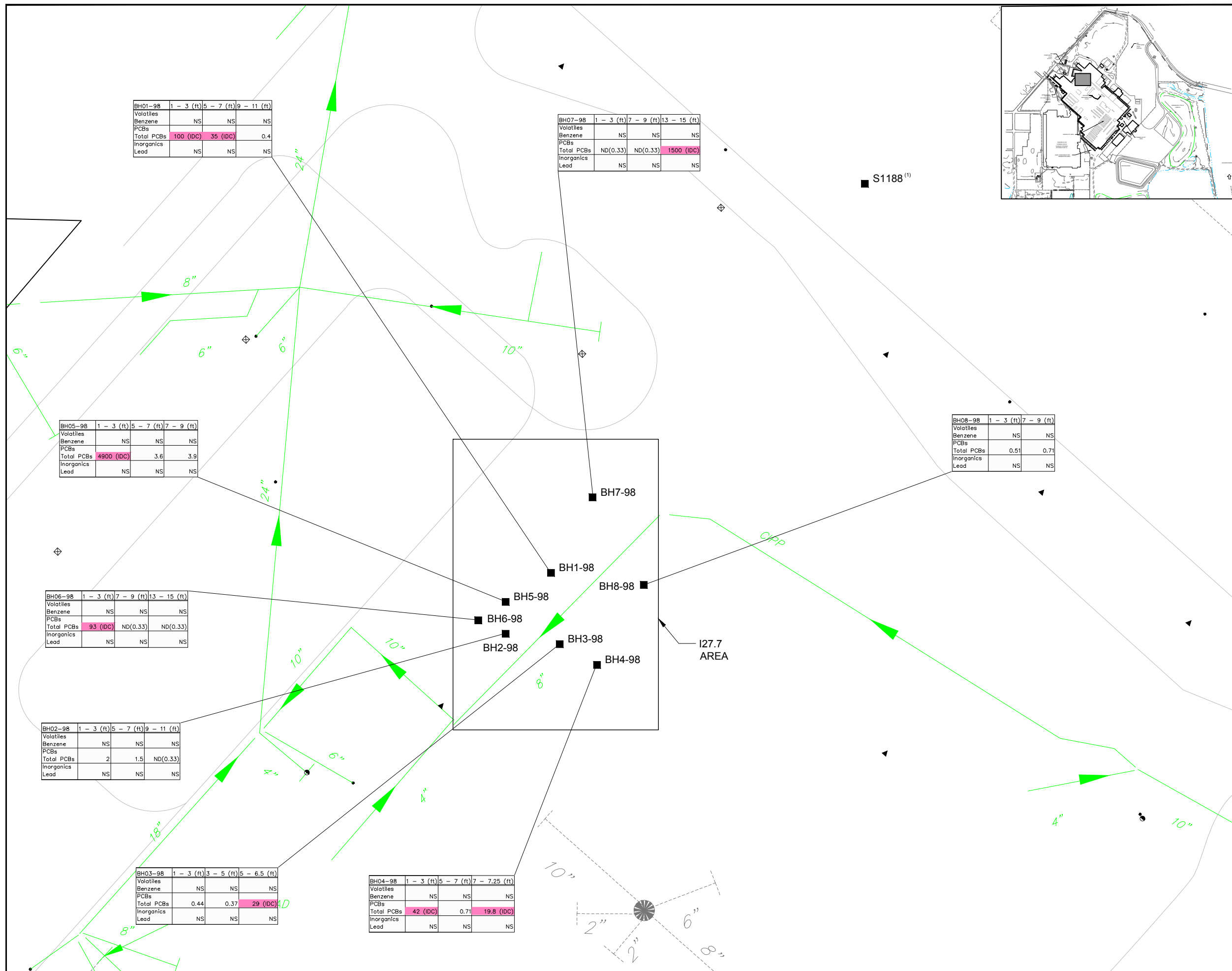
Status	Date	Initial

REVITALIZING AUTO COMMUNITIES ENVIRONMENTAL RESPONSE (RACER) SMI, SAGINAW, MICHIGAN
SAGINAW, MICHIGAN
SURFICIAL PCB CONCENTRATIONS



Source Reference:

Project Manager: MRT	Reviewed By: JEP	Date: JUNE 2012
Scale: 1:80	Project No: 07878-T05	Report No: GREE001
		Drawing No: 1



NO	Revision	Date	Initial

SCALE VERIFICATION

THIS BAR MEASURES 1" ON ORIGINAL. ADJUST SCALE ACCORDINGLY.

Approved

DRAWING STATUS

Status	Date	Initial

REVITALIZING AUTO COMMUNITIES ENVIRONMENTAL RESPONSE (RACER) SMI, SAGINAW, MICHIGAN

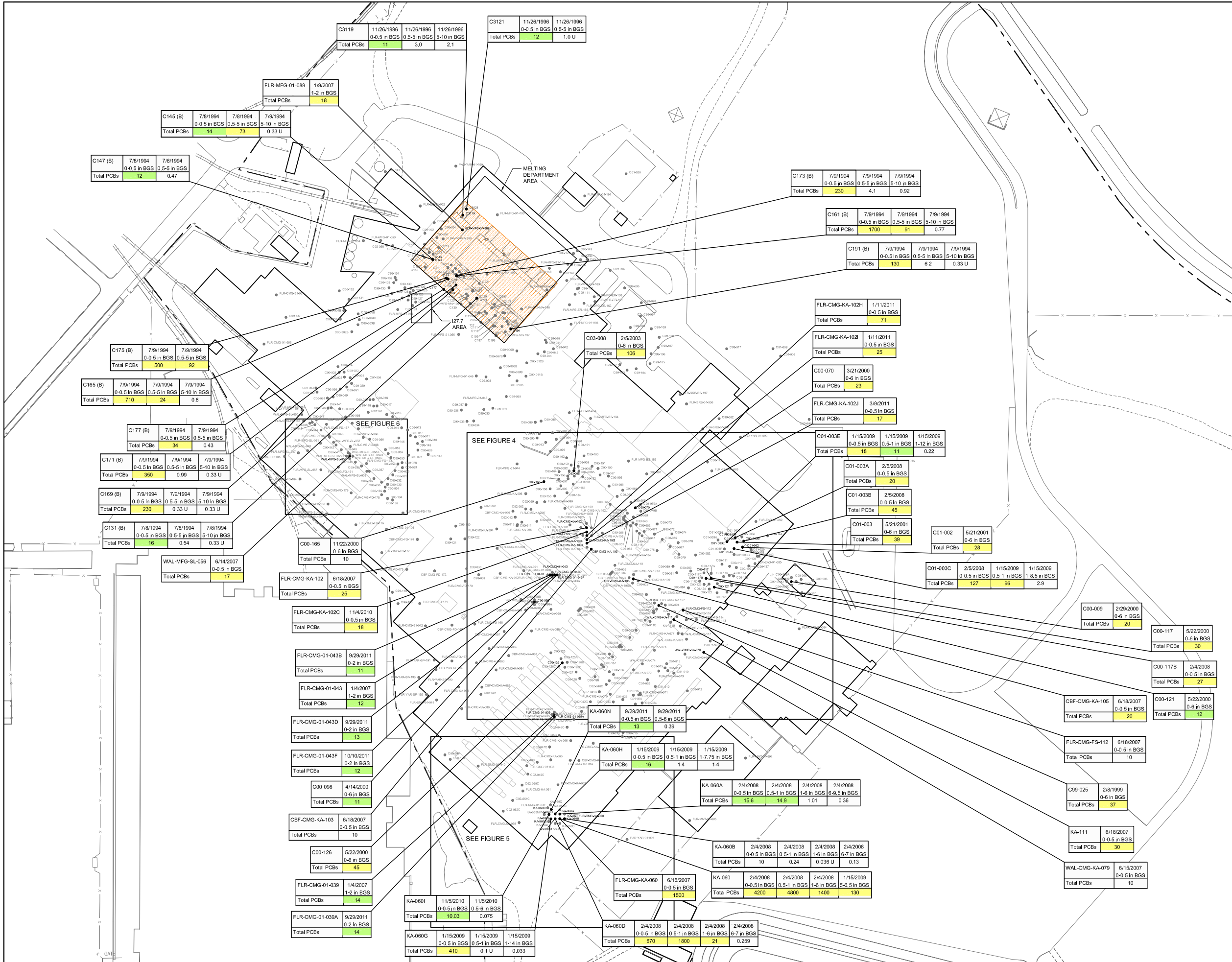
SOIL INVESTIGATIVE LOCATIONS

CONESTOGA-ROVERS & ASSOCIATES

Source Reference:

Project Manager:	Reviewed By:	Date:
MRT	JEP	JUNE 2012
Scale:	Project N°:	Report N°:
1:10	07878-T05	GREE001
		Drawing N°:
		2

07878-T05(GREE001)GN-WA002 AUG 8/2012



No.	Revision	Date	Initial

LEGEND

- RACOR SAGINAW MALLEABLE IRON PLANT PROPERTY LINE (APPROX.)
- BUILDING OUTLINE
- - - - - FENCE LINE
- CONCRETE FLOOR/BASEMENT WALL SAMPLE LOCATION (≥10 mg/kg PCB)
- CONCRETE FLOOR/BASEMENT WALL SAMPLE LOCATION (<10 mg/kg PCB)
- PREVIOUSLY REMEDIATED
- SAMPLE LOCATION
- SAMPLE DATE
- SAMPLE DEPTH BELOW GROUND SURFACE
- RESULT (mg/kg)
- PARAMETER
- >10 mg/kg PCB
- ≥16 mg/kg PCB
- (B) DENOTES SAMPLES COLLECTED FROM BASEMENT LEVEL

SCALE VERIFICATION

THIS BAR MEASURES 1" ON ORIGINAL. ADJUST SCALE ACCORDINGLY.

Approved _____

DRAWING STATUS

Status	Date	Initial

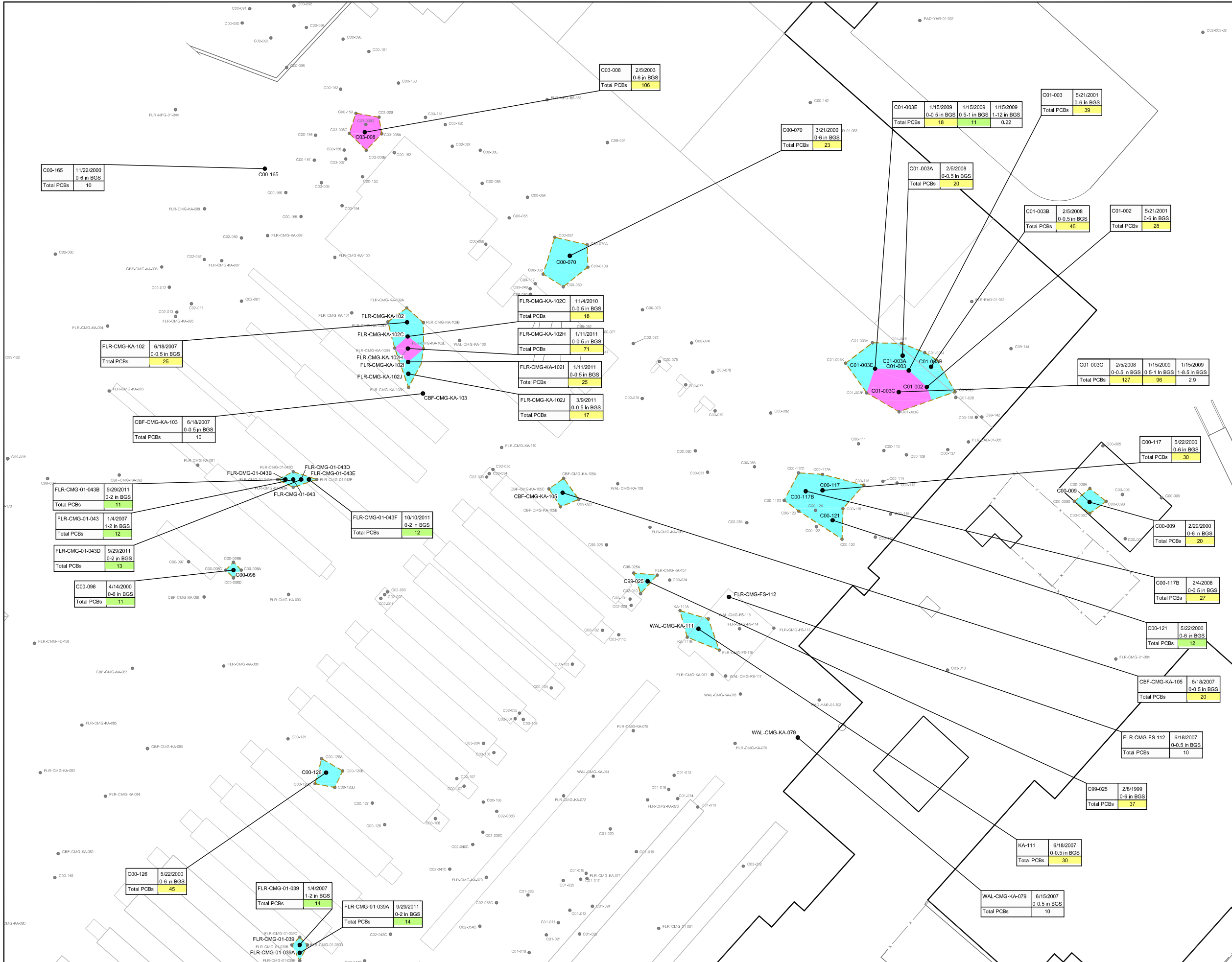
REVITALIZING AUTO COMMUNITIES ENVIRONMENTAL RESPONSE (RACOR) SMI, SAGINAW, MICHIGAN

SAGINAW, MICHIGAN

PCB INVESTIGATION SAMPLING RESULTS (CONCRETE)

Source Reference:

Project Manager: MRT	Reviewed By: JEP	Date: JUNE 2012
Scale: 1:100	Project No.: 07878-T05	Report No.: GREE001
		Drawing No.: 3



NO	Revision	Date	Initial

0 10 30ft

LEGEND

- RACER SAGINAW MALLEABLE IRON PLANT PROPERTY LINE (APPROX.)
- BUILDING OUTLINE
- - - FENCE LINE
- CONCRETE FLOOR/BASEMENT WALL SAMPLE LOCATION (≥10 mg/kg PCB)
- CONCRETE FLOOR/BASEMENT WALL SAMPLE LOCATION (<10 mg/kg PCB)
- PREVIOUSLY REMEDIATED
- SAMPLE LOCATION
- SAMPLE DATE
- SAMPLE DEPTH BELOW GROUND SURFACE
- RESULT (mg/kg)
- PARAMETER
- >10 mg/kg PCB
- >16 mg/kg PCB
- - - PROPOSED EXCAVATION LIMITS
- CONCRETE SLAB TO BE REMOVED AND DISPOSED OF AS NON-TSCA WASTE
- CONCRETE SLAB TO BE REMOVED AND DISPOSED OF AS TSCA WASTE

SCALE VERIFICATION

THIS BAR MEASURES 1" ON ORIGINAL. ADJUST SCALE ACCORDINGLY.

Approved

DRAWING STATUS

Status	Date	Initial

REVITALIZING AUTO COMMUNITIES ENVIRONMENTAL RESPONSE (RACER) SMI, SAGINAW, MICHIGAN

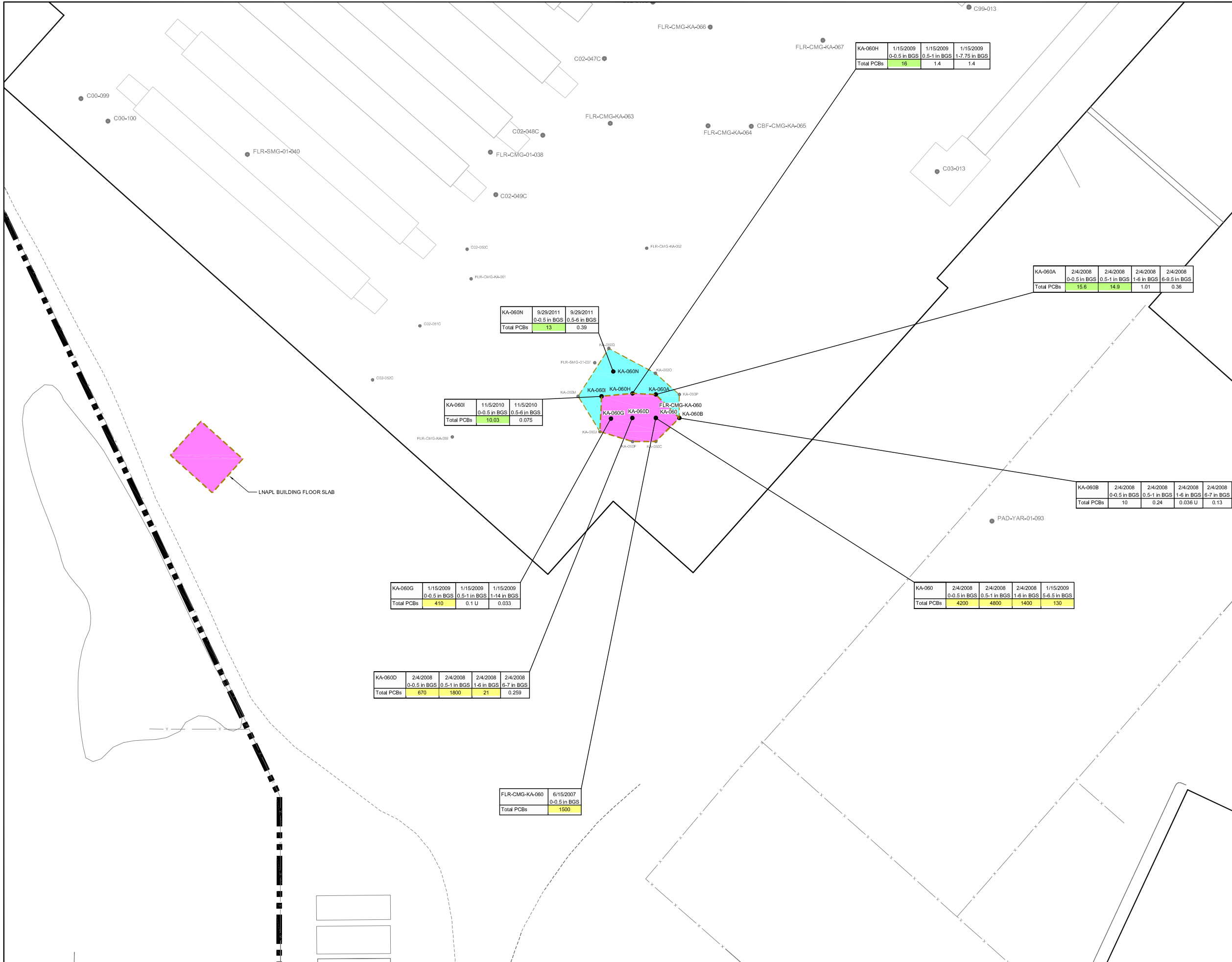
SAGINAW, MICHIGAN

PROPOSED CONCRETE SLAB REMOVAL

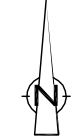
CONESTOGA-ROVERS & ASSOCIATES


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Project Manager:	Reviewed By:	Date:
MRT	JEP	JUNE 2012
Scale:	Project No.:	Report No.:
1:30	07878-T05	GREE001
		Drawing No.:
		4



NO	Revision	Date	Initial






LEGEND

- RACER SAGINAW MALLEABLE IRON PLANT PROPERTY LINE (APPROX.)
- BUILDING OUTLINE
- - - FENCE LINE
- CONCRETE FLOOR/BASEMENT WALL SAMPLE LOCATION (≥10 mg/kg PCB)
- CONCRETE FLOOR/BASEMENT WALL SAMPLE LOCATION (<10 mg/kg PCB)
- ▭ PREVIOUSLY REMEDIATED
- SAMPLE LOCATION
- SAMPLE DATE
- SAMPLE DEPTH BELOW GROUND SURFACE
- RESULT (mg/kg)
- PARAMETER
- >10 mg/kg PCB
- ≥16 mg/kg PCB
- - - PROPOSED EXCAVATION LIMITS
- CONCRETE SLAB TO BE REMOVED AND DISPOSED OF AS NON-TSCA WASTE
- CONCRETE SLAB TO BE REMOVED AND DISPOSED OF AS TSCA WASTE

SCALE VERIFICATION

THIS BAR MEASURES 1" ON ORIGINAL. ADJUST SCALE ACCORDINGLY.




Approved: _____

DRAWING STATUS

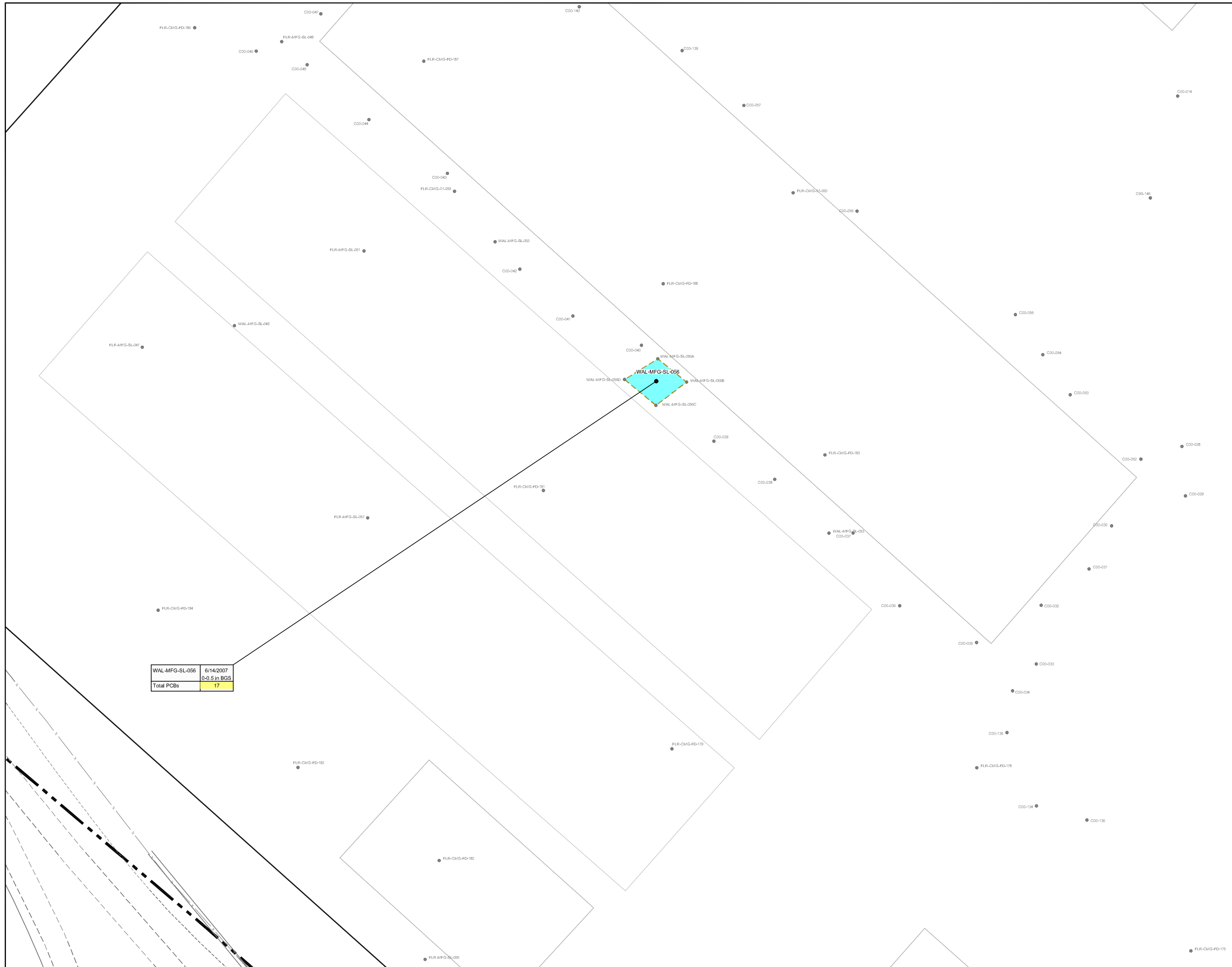
Status	Date	Initial

REVITALIZING AUTO COMMUNITIES
ENVIRONMENTAL RESPONSE (RACER)
SMI, SAGINAW, MICHIGAN
SAGINAW, MICHIGAN
PROPOSED CONCRETE SLAB REMOVAL


CONESTOGA-ROVERS & ASSOCIATES

Source Reference:

Project Manager:	Reviewed By:	Date:
MRT	JEP	JUNE 2012
Scale:	Project No.:	Report No.:
1:20	07878-T05	GREE001
		Drawing No.:
		5



WAL-MFG-SL-056	6/14/2007
0-0.5 in BGS	
Total PCBs	17

NO	Revision	Date	Initial

N

0 5 10ft

LEGEND

- RACER SAGINAW MALLEABLE IRON PLANT PROPERTY LINE (APPROX.)
- BUILDING OUTLINE
- x- FENCE LINE
- CONCRETE FLOOR/BASEMENT WALL SAMPLE LOCATION (≥10 mg/kg PCB)
- CONCRETE FLOOR/BASEMENT WALL SAMPLE LOCATION (<10 mg/kg PCB)
- PREVIOUSLY REMEDIATED
- SAMPLE LOCATION
- SAMPLE DATE
- SAMPLE DEPTH BELOW GROUND SURFACE
- RESULT (mg/kg)
- PARAMETER
- >10 mg/kg PCB
- ≥16 mg/kg PCB
- - - PROPOSED EXCAVATION LIMITS
- CONCRETE SLAB TO BE REMOVED AND DISPOSED OF AS NON-TSCA WASTE

C01-002	5/21/2001		
Total PCBs	28		

SCALE VERIFICATION

THIS BAR MEASURES 1" ON ORIGINAL. ADJUST SCALE ACCORDINGLY.

Approved

DRAWING STATUS

Status	Date	Initial

REVITALIZING AUTO COMMUNITIES ENVIRONMENTAL RESPONSE (RACER) SMI, SAGINAW, MICHIGAN

SAGINAW, MICHIGAN

PROPOSED CONCRETE SLAB REMOVAL



Source Reference:

Project Manager:	Reviewed By:	Date:
MRT	JEP	JUNE 2012
Scale:	Project N ^o :	Report N ^o :
1:10	07878-T05	GREE001
	Drawing N ^o :	
	6	



NO	Revision	Date	Initial

LEGEND

- RACER SAGINAW MALLEABLE IRON PLANT PROPERTY LINE (APPROX.)
- BUILDING OUTLINE
- FENCE LINE
- PCBs IN PORTIONS OF CONCRETE SLAB

SCALE VERIFICATION
THIS BAR MEASURES 1" ON ORIGINAL. ADJUST SCALE ACCORDINGLY.

Approved _____

DRAWING STATUS

Status	Date	Initial

**REVITALIZING AUTO COMMUNITIES
 ENVIRONMENTAL RESPONSE (RACER)
 SMI, SAGINAW, MICHIGAN
 SAGINAW, MICHIGAN**

**PROPOSED DEED RESTRICTIONS
AREA FOR CONCRETE SLAB**



Source Reference:

Project Manager: MRT	Reviewed By: JEP	Date: JUNE 2012
Scale: 1:100	Project N ^o : 07878-T05	Report N ^o : GREE001
		Drawing N ^o : 7

APPENDIX A

CERTIFICATION STATEMENT

CERTIFICATION STATEMENT

I certify that all sampling plans, sample collection procedures, sample preparation procedures, extraction procedures, and instrumental/chemical analysis procedures used to assess or characterize the PCB contamination at the cleanup site, are on file and are available for EPA inspection.



David Favero
Deputy Cleanup Manager - Michigan
RACER

August 8, 2012

Date