November 23, 2016

Michelle Kaysen (LU-9J)
United States Environmental Protection Agency
Land and Chemicals Division
77 W. Jackson Blvd
Chicago, IL 60604

RE: Corrective Action Complete with Controls Determination (CACC)
RACER Dort Highway Land, Grand Blanc, MI - MID005356944
FILE: 15388/62654/rep

Dear **Ms. Kaysen,**

O'Brien & Gere has prepared this Request for Resource Conservation and Recovery Act (RCRA) Corrective Action Complete with Controls Determination (CACC) on behalf of Revitalizing Auto Communities Environmental Response (RACER) Trust for the Dort Highway Land located in Grand Blanc, Michigan (Site).

1.0 INTRODUCTION

1.1 PURPOSE

This CACC is being submitted pursuant to the U.S. Environmental Protection Agency's (U.S. EPA) Performance Based Corrective Action Agreement (PBCAA) effective September 29, 2011, with the RACER Trust since the corrective measures to address contamination at the Site have been completed.

This request has been prepared according to the U.S. EPA Final Guidance on Completion of Corrective Action Activities at RCRA Facilities (U.S. EPA, February 2003). In particular, the Site meets the following criteria for issuing a CACC:

- ***Corrective Measures Defined*** - Corrective Measures were selected by U.S. EPA in its Final Decision dated June 6, 2016 (Final Decision), which is provided in **Attachment A**.
- ***Corrective Measures Complete and Compliance/ Monitoring Remaining –*** Corrective Measures are complete and Site-specific cleanup objectives have been met as discussed in Section 3.0. The only remaining activities are continued compliance with institutional controls, as discussed in Section 4.0. No ongoing operation and maintenance is required at the Site.

1.2 REPORT ORGANIZATION

The remainder of this Report is organized into the following sections:

Section 2.0 - Background - describes the Site, and summarizes the Site history, significant investigation and remediation activities and RCRA report submittals
Section 3.0 - Selected Corrective Measures – summarizes the Corrective Measures, objectives, and status

Section 4.0 - Remaining Corrective Measures Activities – summarizes the remaining activities at the Site associated with Corrective Action
Section 5.0 - Conclusions

2.0 BACKGROUND

2.1 SITE DESCRIPTION AND HISTORY

The Site is located in an industrial and commercial area of Grand Blanc, Michigan. The address for the Site is 6501 South Dort Highway but the Site may also be associated with10800 S. Saginaw Street, which is the address for the adjacent General Motors LLC (GM LLC) plant, which the Site was part of prior to General Motors Corporation's (GMC) (aka Motors Liquidation Company) 2009 bankruptcy (**Figure 1**).

The Site is presently owned by RACER Properties LLC, a wholly owned entity of RACER Trust. The Site is comprised of a 20-acre portion of what was formerly part of the adjacent GM LLC plant, and was known as "Area 2." The operational portion of the current GM LLC plant is now known as the Weld Tool Center (WTC).

The Site is currently unused, vacant land enclosed by a fence that separates it from the adjacent GM LLC plant (see **Figure 2**). The Site and a portion of the adjacent plant were constructed in 1942 as a tank arsenal by the United States Department of Defense. The Site was initially used as a test track for the tanks manufactured at the adjacent plant, and the property also included a pump house and water tank utilized for water storage for firefighting.

After World War II, the Site and plant were leased from the government by the Buick Motor Division and were later purchased by the former GMC in 1951. The Site was then used for die and other equipment storage during the manufacturing of automobile parts at the adjacent plant, and for water storage. During the Korean War, Fisher Body (a unit of the former GMC) produced Patton M-48 Medium Tanks at the plant, and the Site was again used as a tank test track.

In 1955, the Site was converted to automotive body metal fabricating and the Press Room was added to the plant. The former GMC stopped manufacturing automotive body parts in 2008 and began the demolition of the former Press Room, which concluded in 2010. The pump house and tank formerly at the Site were also decommissioned and demolished during this time. From 2010 until 2013 GM LLC fabricated, assembled, and repaired robotic systems for other automotive plants at the adjacent plant. In 2013 the plant was converted into a warehouse, which remains its use at the time this CACC request was prepared.

As a result of the former GMC bankruptcy proceedings (from 2009-2011), the Site, now known as the Dort Highway Land Site, remained with Motors Liquidation Company. Per the bankruptcy Settlement Agreement RACER Trust was created on March 31, 2011 and the Site was transferred to RACER Properties LLC on that same day. U.S. EPA and RACER entered into a PBCAA effective September 29, 2011. The Site has been addressed under the U.S. EPA RCRA Corrective Action program pursuant to that PBCAA.

The Site was not a facility that operated under interim status subject to Section 3005(e) of RCRA; however, RACER's obligation under the PBCAA was to investigate, stabilize and remediate releases of hazardous wastes or hazardous constituents at or from the Site that may present an unacceptable risk to human health or the environment, consistent with the RCRA Corrective Action standards.

2.2 INVESTIGATIONS

Previous Investigation Activities, 2005-2010

Investigations were conducted by the former GMC (aka MLC) in 2005, 2007, and 2010. RACER conducted more investigation work in August and September 2011 (Current Conditions and Floor Block Area Investigations, OBG, 2011), and 2012 and 2013 (Groundwater Investigation Report, OBG, 2012). The following information is presented in chronological order.

Two Phase I Environmental Site Assessments (Phase I ESAs) were conducted at the Site by the former GMC in 2005 and 2010. Both Phase I ESAs were conducted to evaluate the potential for the presence of contamination from past practices. The first Phase I ESA was conducted in 2005 concluded there were potential impacts to the Site from various sources, though data was not collected at that time to confirm.

In 2007, a Phase II Environmental Site Assessment (Phase II ESA) was conducted at the Site in response to the potential impacts identified from the 2005 Phase I ESA. Soil and groundwater samples were collected and analysis found polynuclear aromatic hydrocarbons (PAHs) and metals in the soil above industrial screening criteria. Groundwater at that time did not have impacts above residential drinking water criteria. Following this assessment, further delineation (*i.e.*, Delineation Investigation) was conducted in 2007 and confirmed the extent of areas with soil impacted by PAHs and metals. It was estimated in 2007 that approximately 2,600 cubic yards of soil were impacted.

In 2009, soil was excavated from across the majority of the Site to an approximate depth of 3 to 4 feet. Most of the contamination impacts identified during the 2007 Phase II ESA and Delineation Investigation were less than 3 feet deep, except in one location, the SS2-24 area, where impacts above the industrial criteria were encountered to depths of up to 6 feet. The impacted soils delineated during the Phase II ESA and Delineation Investigation were largely removed during the 2009 soil removal activities at the Site.

The second Phase I ESA concluded PAH-impacted soil remaining at the SS2-24 area. This area was previously identified as having PAH contamination at depths greater than the 2009 soil excavation. Following the 2009 soil excavation, it was estimated that 187 cubic yards of PAH-impacted soil remained on site. It was also noted that wooden floor blocks were observed in the southern portion of the Site and appeared stained with oil.

RACER Investigation Activities, 2011 – Present

Under the 2011 PBCAA, RACER conducted additional delineation to determine the nature and extent of any remaining contamination in the soil, to expand the groundwater investigation, and delineate the locations of the stained wooden floor blocks. A Site Conditions Investigation (OBG, 2011) and a Floor Block Area Investigation (OBG, 2011) were conducted in August and September 2011. The investigations assessed the Site conditions following the 2009 soil removal activities and evaluated the extent and potential impacts associated with the wooden floor blocks identified on the southern end of the Site during the 2010 Phase I ESA.

2.3 INTERIM MEASURES

Three separate interim measures (IMs) have been implemented at the Site:

- A small soil excavation to address mercury (Mercury-Contaminated Soil IM), which was completed in 2009 under the oversight of the Michigan Department Environmental Quality (MDEQ)
- A large, site-wide, soil excavation to address the top 3 to 4 feet of soil contaminated with metals and PAHs (Site-Wide Soil Excavation IM), which was completed in 2009 under the oversight of MDEQ
- The final floor block and soil excavation interim measure (Floor Block and Soil Excavation IM), which took place under the PBCAA, in 2011.

Details of each interim measure was presented in the Statement of Basis (**Attachment B**).

3.0 SELECTED CORRECTIVE MEASURES

3.1 SELECTED REMEDIES

U.S. EPA selected the following corrective measures as final remedies to address contamination at the Site.

Soil Excavation and Off-Site Disposal:

The completed soil interim measures constitute a portion of the final remedies for the Site. Interim measures were completed at the Site in 2009 and between December 2011 and January 2012. Remedial activities included soil excavation, removal of floor blocks, confirmation sampling and analysis, backfilling, and off-site disposal of contaminated soil and floor blocks. Interim measures also included site restoration activities that took place between January and March 2012, which included grading, topsoil placement, seeding, fertilizing, and mulching. Additional information is provided in **Attachment B**.

Site-Wide Land Use Restriction:

Land use at the entire Site is limited to nonresidential uses. A restriction was placed on the deed in 2015 to limit the future use of the property (**Attachment C**), and a nonresidential re-use scenario is consistent with the adjacent and surrounding land use.

Groundwater Use:

A groundwater use deed restriction was placed on the property in 2015 notifying potential future owners that groundwater contamination is present, groundwater cannot be used for potable purposes, and installation of a water supply well is prohibited (**Attachment C**).

3.2 INSTITUTIONAL CONTROLS

In order to implement the institutional controls (i.e., use restrictions) selected by U.S. EPA as part of the final corrective measures for the Site, a Declaration of Restrictive Covenant (RC) was recorded with the Genesee County Register of Deeds (RC-WHMD-111-14-010, dated April 1, 2015 and recorded April 7, 2015) (**Attachment C**). The RC was recorded to:

- Restrict land use at the entire Site to nonresidential uses
- Notify current and potential future owners that site soils, media and/or debris shall be managed in accordance with applicable requirements of RCRA and other relevant local, state and federal laws
- Notify current and potential future owners that a groundwater deed restriction was placed on the property, and that groundwater contamination is present, groundwater cannot be used for potable purposes, and installation of a water supply well is prohibited.

Upon successful implementation of alternative/additional corrective measures, if any, and upon approval from U.S. EPA, in consultation with the MDEQ, the Restrictive Covenant may be revised to eliminate those restrictions that are determined to no longer be necessary.

Additionally, as Site redevelopment activities may warrant, portions of the property may be separated for sale, and the RC for the individual parcel may be modified to only include restrictions appropriate for the parcel, upon U.S. EPA approval, in consultation with the MDEQ.

4.0 WELL ABANDONMENT

The on-site monitoring wells (MW-1 through MW-9 and MW2-1) were properly abandoned on November 2, 2016 in accordance with the MDEQ Abandoned Well Plugging Rules Summary.

Abandonment procedures for each of the ten Site monitoring wells consisted of slowly pouring bentonite chips into the well casing, filling from the bottom to the top of the well casing. Water was poured into the casing every 2 feet above the static water level to hydrate the bentonite. Then the monitoring well casing was removed 2 feet below grade and an additional 6 inches of bentonite chips was added to seal the top of the cut off casing. The hole was then backfilled with soil and the ground surface was restored. The well abandonment logs and photo log of activities are provided in **Attachment D** and **Attachment E**, respectively.

5.0 REMAINING CORRECTIVE MEASURES ACTIVITIES

Based on the Corrective Measures selected in the Final Decision (U.S. EPA, June 2016), remaining activities at the Site include:

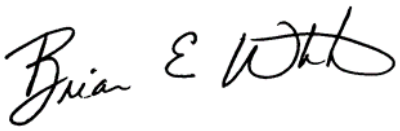
- Verification of compliance with the provisions of the Declaration of Restrictive Covenant RC-WHMD-111-14-010.

6.0 CONCLUSIONS

Implementation of the Corrective Measures for the Site, as outlined in the Final Decision, is complete. Monitoring activities are complete and no ongoing operation and maintenance is required at the Site.

Based on the information provided in this report, RACER is requesting a RCRA Corrective Action Complete with Controls Determination from U.S. EPA for the Dort Highway Land located in Grand Blanc, Michigan, U.S. EPA No. MID 005 356 944.

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



Brian E. White, PE
Senior Vice President

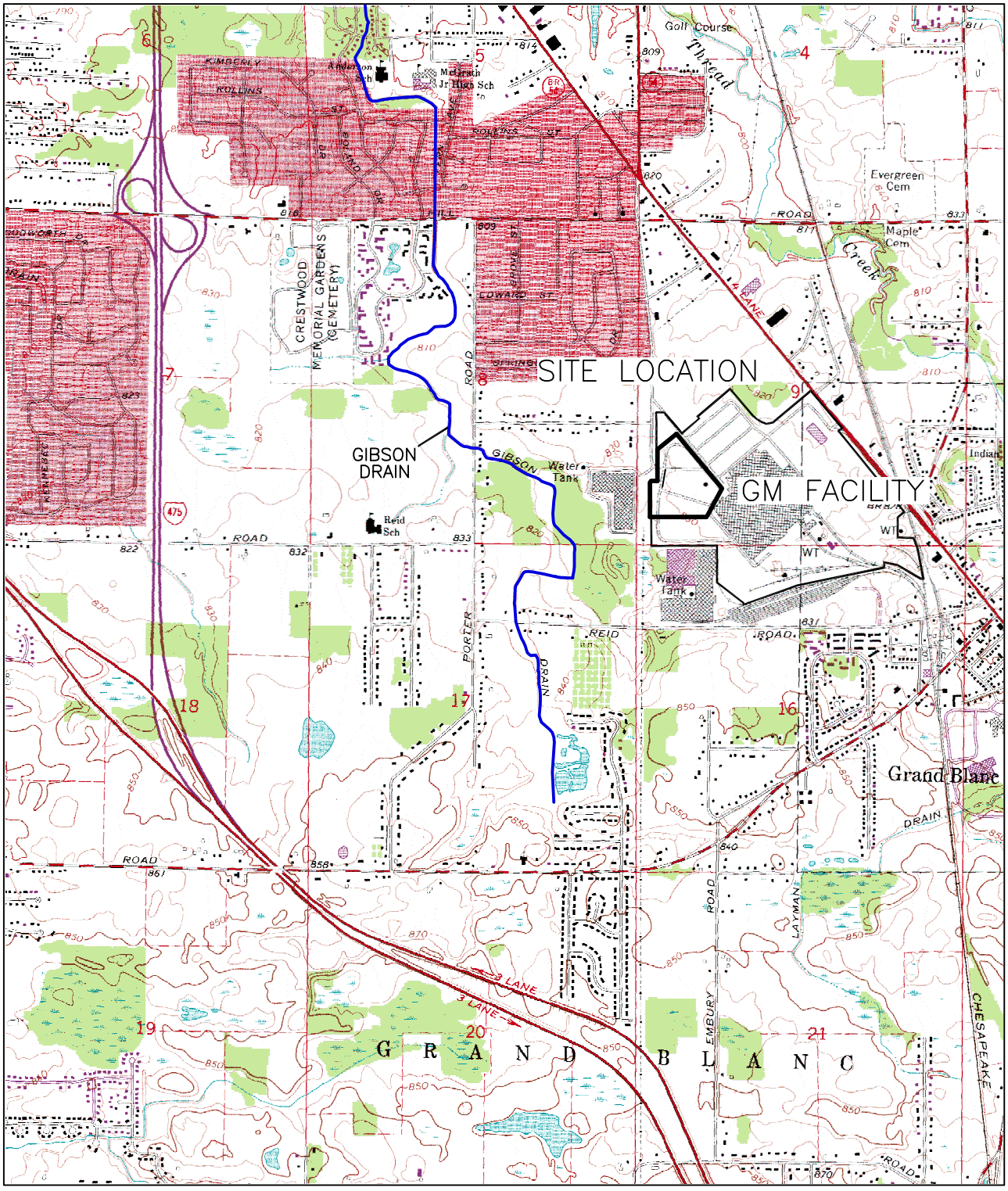
Very truly yours,
O'BRIEN & GERE ENGINEERS, INC.

Clifford S. Yantz
Scientist-3

ENCLOSURES:
Figure 1 – Site Location Map
Figure 2 – Site Layout
Attachment A – Final Decision
Attachment B – Statement of Basis
Attachment C – Declaration of Restrictive Covenant
Attachment D – Well Abandonment Logs
Attachment E – Well Abandonment Photo Log
Attachment F – Referenced Documents

Figures

FIGURE 1



MICHIGAN
QUADRANGLE LOCATION

RACER TRUST
DORT HIGHWAY LAND
GRAND BLANC, MICHIGAN

SITE LOCATION

0 1
APPROXIMATE SCALE
ONE MILE

TRUE NORTH

O'BRIEN & GERE
ENGINEERS INC.

14774/50136.001
JUNE 2013

06/07/13 078 TJK

I:\Racer-Trust.15388\50136.Dort-Highway\Docs\DWG\Sheets\001

FIGURE 2

DORT HIGHWAY

STORM WATER DISCHARGE STRUCTURES

MW-4

MW-3

MW-2

MW-1

APPROXIMATE FENCE LOCATION

MW-5

FORMER ACCESS ROADS & DIE STORAGE AREA

MW2-2 (DESTROYED)

MW-6

FORMER MISC. EQUIPMENT & MATERIAL STORAGE AREA

MW-9

Water Test For Tank (Buried)

PRIMARY GATE

MW2-1

Former Pumphouse

MW-8

MW-7

Pump House and tank have been demolished

CROCK SUMP

EMERGENCY EVACUATION ASSEMBLY AREA

TRUE NORTH

1"=120' 60 0 60

LEGEND

- MONITORING WELL LOCATION
- FORMER FLOOR BLOCK AREA
- APPROXIMATE RACER TRUST PROPERTY LINE
- FORMER TANK TEST TRACK AND DIE STORAGE ACCESS ROADS
- APPROXIMATE FENCE LOCATION
- SURFACE RUNOFF FLOW DIRECTION
- STORM WATER DISCHARGE STRUCTURE

SITE LAYOUT

RACER TRUST
DORT HIGHWAY LAND
GRAND BLANC, MICHIGAN

15388/50136.002
JUNE 2013

O'BRIEN & GERE ENGINEERS, INC.

Attachment A – Final Decision

FINAL DECISION

For

Soil and Groundwater Cleanup

The Dort Highway Land Site

Grand Blanc, Michigan

RACER Trust

Performance-Based Corrective Action Voluntary Agreement

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Final Decision
June 2016
Dort Highway Land

INTRODUCTION

This Final Decision (FD) is for the Dort Highway Land Site ("Site") located in Grand Blanc, Michigan (*see* Figure 1). This FD presents the selected corrective measures to address contamination at the Site pursuant to the U.S. Environmental Protection Agency's (EPA) September 29, 2011 Performance-based Voluntary Agreement (VA) with the Revitalizing Auto Communities Environmental Response (RACER) Trust. Included in this FD is a summary of the final selected remedies, interim measures taken at the facility, the investigations completed, and the public participation activities. Additional details relating to the facility conditions, the measures taken and all the alternatives considered are available in the Statement of Basis (Attachment 1) issued by EPA in April 2016. Prior to issuing this Final Decision, EPA presented the Statement of Basis to the public and stakeholders for review and comment from April 19, 2016 – May 19, 2016. EPA did not receive any comments on the proposed remedy presented in the Statement of Basis and presents the final selected remedies in this document.

SELECTED REMEDIES

EPA is selecting the following corrective measures as final remedies to address contamination at the Facility.

Soil Excavation and Off-Site Disposal: The completed soil interim measures will constitute the final remedies for the site. Interim measures were completed at the Site in 2009 and between December 2011 and January 2012. Remedial activities included soil excavation, removal of floor blocks, confirmation sampling and analysis, backfilling, and off-site disposal of contaminated soil and floor blocks. Interim measures also included site restoration activities that took place between January and March 2012, which included grading, topsoil placement, seeding, fertilizing and mulching. Additional information is provided in the *Interim Measures* section of this document.

Site-Wide Land Use Restriction: Land use at the entire Site will be limited to industrial and/or commercial uses. A restriction will be placed on the deed to limit the future use of the property; however, an industrial re-use scenario will be consistent with the adjacent and surrounding land use.

Groundwater Use: A groundwater deed restriction will be placed on the property notifying potential future owners that groundwater contamination is present, groundwater cannot be used for potable purposes, and installation of a water supply well is prohibited.

FACILITY BACKGROUND

The Site is located in an industrial and commercial area of Grand Blanc, Michigan. The current address for the Site (10800 S. Saginaw Street) is also associated with the adjacent General Motors LLC (GM) plant, and at some point a unique address for the Site may be established.

The Site is presently owned by RACER Properties, LLC, a wholly-owned subsidiary of RACER Trust, which received ownership of the Site following the bankruptcy of General Motors Corporation (former GM Corporation)/Motors Liquidation Company (MLC) and finalization of a Settlement Agreement through the bankruptcy court. The Site is comprised of a 20-acre portion of what was formerly part of the adjacent GM Site, and was known as "Area 2". The operational portion of the current GM plant is now known as the Weld Tool Center (WTC).

The Site is currently unused, vacant land enclosed by a fence that separates it from the adjacent GM facility (*see* Figure 2). The Site and a portion of the adjacent plant were constructed in 1942 as a tank arsenal by the United States Department of Defense. The Site was initially used as a test track for the tanks manufactured at the adjacent plant, and the property also included a pump house and water tank utilized for water storage for firefighting. After World War II, the Site and plant were leased from the government by the Buick Motor Division and were purchased by the former General Motors Corporation in 1951. The Site was then used for die and other equipment storage during the manufacturing of automobile parts at the adjacent plant, and for water storage. During the Korean War, Fisher Body (a unit of General Motors Company) produced Patton M-48 Medium Tanks at the plant, and the Site was again used as a tank test track. In 1955, the Site was converted to automotive body metal fabricating and the Press Room was added to the plant. The former GM Corporation stopped manufacturing automotive body parts in 2008 and began the demolition of the former Press Room, which concluded in 2010. The pump house and tank formerly located on the Site were also decommissioned and demolished during this time. GM currently fabricates, assembles and repairs robotic systems for automotive facilities at the adjacent plant.

As a result of the former GM bankruptcy proceedings (from 2009-2011), the Site, now known as the Dort Highway Land Site, was identified as excess property no longer needed by GM. RACER Trust, therefore, came into possession of this parcel of land. The Site has been addressed under the EPA RCRA Corrective Action program through a Voluntary Agreement (VA). The Dort Highway Land Site was not a facility that operated under interim status subject to Section 3005(e) of RCRA; however, RACER's obligation under the Agreement was to investigate, and as necessary, stabilize and remediate releases of hazardous wastes or hazardous constituents at or from the Site that may present an unacceptable risk to human health or the environment, consistent with the RCRA Corrective Action standards.

A full description of the facility's history, hydrogeological and ecological setting can be found in the attached Statement of Basis, pages 3-5.

INTERIM MEASURES

Three separate interim measures have been implemented at the Site: a small soil excavation to address mercury (Mercury-Contaminated Soil IM); a large, site-wide soil excavation to address the top three to four feet of soil contaminated with metals and PAHs (Site-Wide Soil Excavation IM); and, floor block and soil excavation to address the remaining PAH-contaminated soil (Floor Block and Soil Excavation IM). The final floor block and soil excavation interim measure took place under the EPA's VA, in 2011. The two other soil excavation interim measures took place in 2009 under the oversight of MDEQ. Details of each interim measure can be found in the attached Statement of Basis, pages 6-8.

INVESTIGATION

Previous Investigation Activities, 2005 – 2010

Investigations were conducted by GM in 2005, 2007, and 2010. RACER conducted the most recent investigation work in August and September 2011 (Current Conditions and Floor Block Area Investigations), and 2012 and 2013 (Groundwater Investigation).

The Phase I ESAs conducted at the Site by previous owners were not under this VA; one was conducted in 2005 for the former GM Corporation, and another was conducted in 2010, also for the former GM Corporation, which changed its name to Motors Liquidation Company (MLC) after the bankruptcy. Both Phase I ESAs were conducted to evaluate the existence of contamination from past practices. The first ESA conducted in 2005 concluded there were potential impacts to the Site from various sources, though data was not collected at that time to confirm. The second ESA was conducted in 2010, following some delineation work in 2007. Remedial activities and additional investigation had occurred between 2005 and 2010; therefore, the following information will be presented in chronological order.

In 2007, a Phase II ESA was conducted at the site in response to the potential impacts found from the 2005 Phase I ESA. Soil and groundwater samples were collected and analysis found polynuclear aromatic hydrocarbons (PAHs) and metals in the soil above industrial screening criteria. Groundwater at that time did not have any impacts above residential drinking water criteria. Following this assessment, further delineation was conducted in 2007 and confirmed the extent of areas with soil impacted by PAHs and metals. It was estimated in 2007 that approximately 2,600 cubic yards of soil was impacted.

In 2009, soil was excavated from across the majority of the Site to an approximate depth of 3-4 feet. Most of the contamination impacts identified during the 2007 Phase II ESA and Delineation Investigation were less than 3 feet deep, except in one location, the SS2-24 area, where impacts above the industrial criteria were encountered to depths of up to 6 feet. It appears that the impacted soils delineated during the Phase II ESA and Delineation Investigation were largely removed during the 2009 soil removal activities at the Site.

The second Phase I ESA conducted in 2010 occurred as a result of the GM bankruptcy and subsequent acquisition of this portion of the GM facility by the Trust. The ESA concluded PAH-

impacted soil remained at the SS2-24 area. This area was previously identified as having PAH contamination at depths greater than the 2009 soil excavation. Following the 2009 soil excavation, it was estimated that 187 cubic yards of PAH-impacted soil remained on site. It was also noted that wooden floor blocks were observed in the southern portion of the site and appeared stained with oil.

Recent Investigation Activities, 2011 – Present

Under the 2011 VA, RACER conducted additional contamination delineation to determine the nature and extent of any remaining contamination in the soil, to expand the groundwater investigation, and delineate the locations of the stained wooden floor blocks. A Site Conditions investigation and a Floor Block Area Investigation were conducted in August and September 2011. The investigations assessed the Site conditions following the 2009 soil removal activities and evaluated the extent and potential impacts associated with the wood floor blocks identified on the southern end of the Site during the 2010 Phase I ESA.

The attached Statement of Basis summarizes the investigation data, the human health risk assessment approach and conclusions, and the ecological risk assessment approach and conclusions, pages 8-12.

SCOPE OF CORRECTIVE ACTION

EPA and RACER Trust entered into the VA in order to investigate and, as necessary, remediate releases at the Site that may pose an unacceptable risk to human health or the environment. RACER received ownership of the Site following the bankruptcy of General Motors Corporation and finalization of a Settlement Agreement through the bankruptcy court. RACER's obligations with respect to this Site are subject to the terms, provisions, and limitations of that Settlement Agreement.

PUBLIC PARTICIPATION

Detailed summaries of each remedial alternative was presented and evaluated using EPA's threshold and balancing criteria on pages 12-17 of the attached Statement of Basis. The proposed remedies presented in the Statement of Basis were available for comment during the public comment period from April 19 – May 19, 2016.

EPA did not receive any comments or questions regarding the proposed remedy during the public comment period. The proposed remedy will be implemented and memorialized as the final remedy, as accepted by stakeholders.

The EPA administrative record is available at the following locations (please call for hours):

EPA, Region 5
7th Floor Record Center
77 W. Jackson Blvd.
Chicago, IL 60604
(312) 886-4253

Grand Blanc-McFarlen Library
515 Perry Road
Grand Blanc, MI 48439
(810) 694-5310

DECLARATION

Based on the information in this Final Decision and the Administrative Record compiled for this corrective action site, the EPA has determined that the selected remedies at the Dort Highway Land Site are appropriate and will be protective of human health and the environment.

Michael D. Harris for M.G.

Date: 6/06/2016

Margaret M. Guerriero
Director
Land and Chemicals Division
U.S. Environmental Protection Agency,
Region 5

Attachment B – Statement of Basis

STATEMENT OF BASIS

for

Proposed Soil and Groundwater Cleanup

The Dort Highway Land Site
Grand Blanc, Michigan

RACER Trust
Performance-Based Corrective Action Voluntary Agreement

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

STATEMENT OF BASIS
April 2016
Dort Highway Land

INTRODUCTION

This *Statement of Basis* (SB) is for the Dort Highway Land Site ("Site") located in Grand Blanc, Michigan (*see* Figure 1). This SB presents the proposed corrective measures to address contamination at the Site pursuant to the U.S. Environmental Protection Agency's (EPA) September 29, 2011 Performance-based Voluntary Agreement with the Revitalizing Auto Communities Environmental Response (RACER) Trust. EPA will select a final remedy only after the public comment period has ended and the information submitted during this time has been reviewed and considered. EPA is issuing this SB as part of its public participation responsibilities under the Resource Conservation and Recovery Act (RCRA).

This document summarizes information that can be found in greater detail in the *Corrective Measures Study* (CMS) and other documents contained in the administrative record for this Facility (*see* Attachment 1). EPA encourages the public to review these documents in order to gain a more comprehensive understanding of the Site and activities that have been conducted there under RCRA, 42 U.S.C. §6901 et seq.

EPA may modify the proposed remedy or select another remedy based on new information or public comments. Therefore, the public is encouraged to review and comment on all corrective measure alternatives. The public can be involved in the remedy selection process by reviewing the documents contained in the administrative record and submitting comments to the EPA during the public comment period. If requested during the public comment period, EPA will also host a public meeting to hear comments.

PROPOSED REMEDIES

EPA is proposing the following corrective measures as final remedies to address contamination at the Facility.

Soil Excavation and Off-Site Disposal: EPA is proposing that the completed soil interim measures constitute the final remedies for the site. Interim measures were completed at the Site in 2009 and between December 2011 and January 2012. Remedial activities included soil excavation, removal of floor blocks, confirmation sampling and analysis, backfilling, and off-site disposal of contaminated soil and floor blocks. Interim measures also included site restoration activities that took place between January and March 2012, which included grading, topsoil placement, seeding, fertilizing and mulching. Additional information is provided in the *Interim Measures* section of this document.

Site-Wide Land Use Restriction: Land use at the entire Site will be limited to industrial and/or commercial uses. A restriction will be placed on the deed to limit the future use of the property;

however, an industrial re-use scenario will be consistent with the adjacent and surrounding land use.

Groundwater Use: A groundwater deed restriction will be placed on the property notifying potential future owners that groundwater contamination is present, groundwater cannot be used for potable purposes, and installation of a water supply well is prohibited.

FACILITY BACKGROUND

Location and History

The Site is located in an industrial and commercial area of Grand Blanc, Michigan. The Site is located on and fronts Dort Highway. The current address for the Site (10800 S. Saginaw Street) is also associated with the adjacent General Motors LLC (GM) plant, and at some point a unique address for the Site may be established.

The Site is presently owned by RACER Properties, LLC, a wholly-owned subsidiary of RACER Trust, which received ownership of the Site following the bankruptcy of General Motors Corporation (former GM Corporation)/Motors Liquidation Company (MLC) and finalization of a Settlement Agreement through the bankruptcy court. The Site is comprised of a 20-acre portion of what was formerly part of the adjacent GM Site, and was known as "Area 2". The operational portion of the current GM plant is now known as the Weld Tool Center (WTC).

The Site is currently unused, vacant land enclosed by a fence that separates it from the adjacent GM facility (*see* Figure 2). The Site and a portion of the adjacent plant were constructed in 1942 as a tank arsenal by the United States Department of Defense. The Site was initially used as a test track for the tanks manufactured at the adjacent plant, and the property also included a pump house and water tank utilized for water storage for firefighting. After World War II, the Site and plant were leased from the government by the Buick Motor Division and were purchased by the former General Motors Corporation in 1951. The Site was then used for die and other equipment storage during the manufacturing of automobile parts at the adjacent plant, and for water storage. During the Korean War, Fisher Body (a unit of General Motors Company) produced Patton M-48 Medium Tanks at the plant, and the Site was again used as a tank test track. In 1955, the Site was converted to automotive body metal fabricating and the Press Room was added to the plant. The former GM Corporation stopped manufacturing automotive body parts in 2008 and began the demolition of the former Press Room, which concluded in 2010. The pump house and tank formerly located on the Site were also decommissioned and demolished during this time. GM currently fabricates, assembles and repairs robotic systems for automotive facilities at the adjacent plant.

As a result of the former GM bankruptcy proceedings (from 2009-2011), the Site, now known as the Dort Highway Land Site, was identified as excess property no longer needed by GM. RACER Trust, therefore, came into possession of this parcel of land. The Site has been addressed under the EPA RCRA Corrective Action program through a Voluntary Agreement (VA). The Dort Highway Land Site was not a facility that operated under interim status subject to Section 3005(e) of RCRA; however, RACER's obligation under the Agreement was to investigate, and as necessary, stabilize and remediate releases of hazardous wastes or hazardous

constituents at or from the Site that may present an unacceptable risk to human health or the environment, consistent with the RCRA Corrective Action standards.

Hydrogeological Setting

The Site is underlain by unconsolidated glacial drift soils to depths of about 120 to 160 feet beneath the Site, according to the Groundwater Resources Map Series for Grand Blanc Township (U of M – Flint, Nov. 1994)[1]. The soils underneath the Site consist of loam and clay loam from the Conover series with low infiltration rates. The native clay soils and discontinuous sand seams underlying surficial topsoil at the Site extend to the top of bedrock (*see* Figures 3a and 3b). The Groundwater Resources Maps indicate between 80 and 90 percent of the drift soils to a depth of 100 feet consist of clay in the area of the Site.

Bedrock in the area of the Site is a stratified sequence from the Paleozoic Era. The Bedrock Geology of Michigan map (MDNR, 1987)[2] indicates the Site is underlain by the Pennsylvanian age Saginaw Formation consisting of a fine-grained sandstone and siltstone inter-bedded with shale, limestone, coal and gypsum. The bedrock surface is reported to vary in elevation from about 680 to 720 feet above mean sea level (aMSL) beneath the Site and generally slopes toward the southwest.

The depth to groundwater at the Site is generally less than 12 feet below ground surface; however, this may be indicative of perched groundwater conditions due to the extent of competent clay. The Groundwater Resources Map Series for Grand Blanc Township (U of M – Flint, 1994) indicates the regional groundwater table exists at elevations of about 50 to 70 feet below grade (fbg). The Site area is gently sloped and based on local topography, the shallow perched groundwater flow direction appears to be generally towards the east, east of the Site toward Thread Creek located about two thirds of a mile northeast of the Site, and towards the west on the Site toward Gibson Drain located about a quarter mile west of the Site. However, deeper regional groundwater flow is reported to flow towards the northwest (U of M – Flint, 1994).

Ecological Setting

This 20-acre site is a vacant piece of property adjacent and connected to a 210-acre active industrial facility. The Site does not contain suitable ecological habitat for sustaining plants and animals. The surrounding land is also zoned mostly industrial or commercial, with a low potential for ecological habitat sufficient to support most wildlife (*see* Figure 4).

The ecological habitat review suggested that the Site is not likely to provide ecological habitat because it consists exclusively of barren soil or seeded grass areas surrounded by active industry. The surface of the Site has been highly altered by the removal of an average of approximately four feet of soils and fill materials.

[1] University of Michigan – Flint, 1994. Groundwater Resources Map Series, Grand Blanc Township, Genesee County, Michigan. Regional Groundwater Center. November
[2] Michigan Department of Natural Resources, 1987. Bedrock Geology of Michigan

No wetlands or other waters of the United States occur on the Site. Gibson Drain is the closest surface water body to the Site and is located approximately 1,300 ft southwest of the Site; however, Gibson Drain is a man-made drainage ditch and not a natural water body. Gibson Drain was installed to drain the former agricultural fields that once existed in the Site area. The closest natural water body to the Site is Thread Creek located approximately two thirds of a mile northeast and upgradient from the Site. Attachment 2 provides additional information to support the assessment of the site as habitat, determining that the site does not contain suitable ecological habitat.

Corrective Action Process

EPA and RACER Trust entered into the VA in order to investigate and, as necessary, remediate releases at the Site that may pose an unacceptable risk to human health or the environment. RACER received ownership of the Site following the bankruptcy of General Motors Corporation and finalization of a Settlement Agreement through the bankruptcy court. RACER's obligations with respect to this Site are subject to the terms, provisions, and limitations of that Settlement Agreement.

The Site has undergone several investigations and remedial activities both before and after the VA was signed; however, this Site is not subject to RCRA Corrective Action as discussed on page 3. The 20-acre parcel was utilized in a limited capacity by the adjacent GM facility. The previous investigations, remedial activities, and recent corrective action activities under this VA are described here for completeness. Additional details regarding the work described in the following paragraphs can be found in the *Investigation Results* section, later in this document.

Previous Investigation Activities, 2005 – 2010

Investigations were conducted by GM in 2005, 2007, and 2010. RACER conducted the most recent investigation work in August and September 2011 (Current Conditions and Floor Block Area Investigations), and 2012 and 2013 (Groundwater Investigation).

The Phase I ESAs conducted at the Site by previous owners were not under this VA; one was conducted in 2005 for the former GM Corporation, and another was conducted in 2010, also for the former GM Corporation, which changed its name to Motors Liquidation Company (MLC) after the bankruptcy. Both Phase I ESAs were conducted to evaluate the existence of contamination from past practices. The first ESA conducted in 2005 concluded there were potential impacts to the Site from various sources, though data was not collected at that time to confirm. The second ESA was conducted in 2010, following some delineation work in 2007. Remedial activities and additional investigation had occurred between 2005 and 2010; therefore, the following information will be presented in chronological order.

In 2007, a Phase II ESA was conducted at the site in response to the potential impacts found from the 2005 Phase I ESA. Soil and groundwater samples were collected and analysis found polynuclear aromatic hydrocarbons (PAHs) and metals in the soil above industrial screening criteria. Groundwater at that time did not have any impacts above residential drinking water criteria. Following this assessment, further delineation was conducted in 2007 and confirmed the

extent of areas with soil impacted by PAHs and metals. It was estimated in 2007 that approximately 2,600 cubic yards of soil was impacted.

In 2009, soil was excavated from across the majority of the Site to an approximate depth of 3-4 feet. Most of the contamination impacts identified during the 2007 Phase II ESA and Delineation Investigation were less than 3 feet deep, except in one location, the SS2-24 area, where impacts above the industrial criteria were encountered to depths of up to 6 feet. It appears that the impacted soils delineated during the Phase II ESA and Delineation Investigation were largely removed during the 2009 soil removal activities at the Site.

The second Phase I ESA conducted in 2010 occurred as a result of the GM bankruptcy and subsequent acquisition of this portion of the GM facility by the Trust. The ESA concluded PAH-impacted soil remained at the SS2-24 area. This area was previously identified as having PAH contamination at depths greater than the 2009 soil excavation. Following the 2009 soil excavation, it was estimated that 187 cubic yards of PAH-impacted soil remained on site. It was also noted that wooden floor blocks were observed in the southern portion of the site and appeared stained with oil.

Recent Investigation Activities, 2011 – Present

Under the 2011 Voluntary Agreement, RACER conducted additional contamination delineation to determine the nature and extent of any remaining contamination in the soil, to expand the groundwater investigation, and delineate the locations of the stained wooden floor blocks. A Site Conditions investigation and a Floor Block Area Investigation were conducted in August and September 2011. The investigations assessed the Site conditions following the 2009 soil removal activities and evaluated the extent and potential impacts associated with the wood floor blocks identified on the southern end of the Site during the 2010 Phase I ESA.

Interim Measures (IM) Taken

Three separate interim measures have been implemented at the Site: a small soil excavation to address mercury (Mercury-Contaminated Soil IM); a large, site-wide soil excavation to address the top three to four feet of soil contaminated with metals and PAHs (Site-Wide Soil Excavation IM); and, floor block and soil excavation to address the remaining PAH-contaminated soil (Floor Block and Soil Excavation IM). The final floor block and soil excavation interim measure took place under the EPA's Voluntary Agreement, in 2011. The two other soil excavation interim measures took place in 2009 under the oversight of MDEQ.

Mercury-Contaminated Soil IM

An area approximately 40-foot by 40-foot, to a depth of about 1.5 feet was remediated to remove mercury impacts in the former Subarea B-2. The area is located in the former miscellaneous equipment storage area, and was an area centered on surface soil sampling location SS2-20 (*see* Figure 6).

Under MDEQ oversight, approximately 90 cubic yards of soil were removed from the area and transported and properly disposed of off-site. Nine confirmatory samples were collected after the soil was removed pursuant to the MDEQ *Sampling Strategies and Statistics Training Materials* (S^3TM) *for Part 201 Cleanup Criteria* (MDEQ, 2002) guidance document. The analytical results for the nine confirmatory samples were below the MDEQ nonresidential drinking water protection criteria (1.7 mg/kg).

Site-Wide Soil Excavation IM

An average of 4 feet of soil was excavated from across the majority of the Site, as mentioned earlier (*see* Figure 5). The former GM conducted this site-wide excavation, prior to releasing this portion of the facility to RACER, for the purpose of using the soil to fill the basement of a building being demolished on another portion of the site (currently located on the GM facility, and not part of this Site). The excavation was conducted under MDEQ approval and oversight in 2009. Although the soil was contaminated with metals and PAHs, relocation of the soils from the Site to the basement of the former building was considered moving soils from one area of the Site to another area with similar impacts, and an acceptable practice according to MDEQ regulations. The area impacted with mercury was considered dissimilar to the metals and PAH contamination in the area, and MDEQ required the area be remediated to below drinking water quality criteria as described above. For this reason, the two excavation activities were conducted and managed separately.

(This site-wide soil excavation is being proposed as part of the final remedy because it removed most of the metal and PAH-contaminated soil from the Site. The floor block and soil excavation, described below, removed contamination that remained on-site after this 2009 excavation.)

Floor Block and Soil Excavation IM

A total of approximately 2,600 cubic yards (CY) of impacted soils existed prior to the 2009 soil removal activities, described above. Following the site-wide soil removal activities approximately 187 CY of PAH impacted soil still remained on site, not including the volume of floor blocks present.

In 2011, an investigation was performed to determine the exact nature and extent of the remaining contaminated soil and floor blocks. The investigation included soil samples, floor block samples, and excavation test pits to determine the locations of the buried floor blocks. No VOCs were detected in the soil samples, which confirmed previous Phase II ESA sample results for the Site. None of the soil, soil in contact with floor block, or floor block samples analyzed for RCRA metals and PCBs contained contamination above the MDEQ nonresidential soil cleanup criteria. PAHs were the only SVOC constituents detected at the Site in 2011, which confirmed previous investigation results.

Several PAH constituents were detected at concentrations above the MDEQ nonresidential direct contact and/or drinking water protection criteria in floor block samples within the former floor block area. The soil in contact with the floor blocks exceeded the nonresidential direct contact criteria for one or more of the following PAHs: benzo(a)anthracene, benzo(a)pyrene, and

benzo(b)fluoranthene, but at much lower concentrations (up to several orders of magnitude) than the floor blocks. In addition, bulk soil samples exceeded the nonresidential direct contact criteria for benzo(a)pyrene. Therefore, the floor blocks, soil in contact with the floor blocks, and the bulk soils were recommended for removal to eliminate potential future leaching to groundwater or direct contact exposure risks. The excavation proceeded as an IM to protect the groundwater and facilitate site stabilization and surface water runoff.

The IM implementation activities were completed at the Site between December 2011 and January 2012 including soil excavation, removal of floor blocks, confirmation sampling and analysis, backfilling, and off-Site disposal of approximately 3,105 tons of material containing PAHs. Remediation activities also included Site restoration activities that took place between January and March 2012, which included grading, topsoil placement, seeding, fertilizing and mulching. Seeding, fertilizing and mulching activities were delayed approximately eight weeks due to wet Site conditions following final grading.

Based on field observations during the IM implementation activities and confirmation sampling, removal of the floor blocks and impacted soil was achieved and the remediation of the former floor block area is considered complete.

SUMMARY OF FACILITY RISKS

Investigation Results

Soil

This section will detail all previous investigation activities described in the *Corrective Action Process* section above, including those conducted by previous owners, prior to this VA.

In 2007, a Phase II ESA was conducted at the site in response to the potential impacts found from the 2005 Phase I ESA. The purpose of the Phase II ESA was to provide sufficient information regarding the presence of and approximate extent of impacts from hazardous waste at the site, if any, to assist in making informed land management decisions (*see* Figure 6). The Phase II ESA included:

- Completion of 16 soil boring samples to depths of up to 10 feet below grade and collection of 20 surface soil samples.
- Installation of 2 monitoring wells (MW2-1 and MW2-2) to approximately 20 feet below grade to assess groundwater flow conditions and assess water quality through sample collection.
- Elevation survey of soil borings and monitoring well locations and top of casing elevations to use to accurately locate sample locations and to evaluate groundwater elevations and flow direction.

PAHs and metals were detected in the shallow soil in certain areas of the Site. The majority of impacts were detected in the former floor block area shown in Figure 6. Additional delineation was conducted to determine the extent of contamination and included an additional 12 soil boring samples to depths of up to 10 feet deep and 47 surface soil samples.

This investigation and delineation activity determined that PAHs and metals were impacting the soil from approximately ground level to three feet deep. The groundwater did not appear to be impacted from the soil, likely due to the clay content of the soil limiting infiltration and migration.

The investigation concluded that a total of approximately 2,599 cubic yards of impacted soils existed in 2007. Most of the contaminated soils, including most of the samples collected for the Phase II ESA and delineation investigation results were removed during the 2009 soil removal activities under MDEQ. Therefore, the data represented in the tables below will focus on current conditions. Figures 7 and 8 can be referenced to see the overall change in grade at the site associated with the 2009 soil removal activities. As shown in Figure 8, approximately 4 feet of soil was removed from across the site in 2009.

After the Site came under the ownership of RACER in 2011, an investigation was conducted to assess site conditions following the 2009 soil removal. The former floor block area (*see* Figure 6) visually appeared to still have historic floor block material present. Therefore, the 2011 investigation included the following:

- Collection of twenty surface soil samples (SS-1 through SS-20), five wood block samples (FB-01 through FB-05), and five samples of soil in contact with the floor blocks (FBS-01 through FBS-05) to confirm that impacted soils were removed from the Site area during the 2009 soil removal activities and to evaluate the remaining floor blocks and soil in contact with the floor blocks (*see* Figure 9).

The sample locations and analytical parameters were selected based on the analytical results from the Phase II ESA and delineation investigation, and were analyzed for the following parameters: volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), PAHs, metals, and PCBs.

The former floor block area was then further delineated and the investigation included:

- Excavation of twenty-eight test pits to depths of approximately 2 to 5 feet deep to help delineate the vertical and horizontal extent of floor blocks remaining at the Site.
- Collection of ten soil samples (FBS-06 through FBS-15) to further characterize the soil in the floor block area, in particular soil surrounding the floor blocks, but not in direct contact with the floor block (see Figure 9).
- Collection of two additional soil samples (SS-21 and SS-22) at a depth of approximately 4 feet deep from two test pits where a slight odor and darker colored soils, which appeared to be a layer of buried topsoil, were observed below the floor block.

The analytical results for the soil samples collected during the 2011 sampling events indicated that the 2009 soil removal activities effectively reme diated the Site for the impacts identified during the Phase II ESA and delineation investigation with the exception of PAH-impacted soil associated with the floor blocks observed in the former floor block area.

Several PAH constituents were detected at concentrations above the MDEQ nonresidential direct contact and/or drinking water protection criteria in floor block samples FB-01 through FB-05 within the former floor block area. The soil in contact with the floor blocks samples FBS-01,

FBS-02 and FBS-03 exceeded the nonresidential direct contact criteria for one or more of the following PAHs: benzo(a)anthracene, benzo(a)pyrene, and benzo(b)fluoranthene, but at much lower concentrations (up to several orders of magnitude) than the floor blocks themselves. In addition, bulk soil samples FBS-09, FBS-10, FBS-13 and FBS-14 exceeded the nonresidential direct contact criteria for benzo(a)pyrene. These bulk soil samples were associated with caches of floor blocks in two subareas of the former floor block area. A third subarea, was associated with the PAH impacts that were not fully removed during the previous soil removal activities as discussed in 2009. However, the bulk soil not associated with caches of floor blocks were below the nonresidential criteria. Therefore, the floor blocks, soil in contact with the floor blocks, and the bulk soils in the contaminated areas were recommended for removal to eliminate potential future leaching to groundwater or direct contact exposure risks.

The soil and floor block excavation and off-site disposal was conducted during December 2011 and January 2012. The activities were completed as an interim measure in order to avoid additional rainfall from spring and summer that could have potentially contaminated the otherwise uncontaminated groundwater from leaching.

The soil remaining on-site does not exceed any applicable screening criteria, see Table 1. There are no contaminants of concern at any sampling location with concentrations above the non-residential drinking water protection criteria or the non-residential direct contact criteria. Confirmatory sampling associated with the soil and floor block removal consisted of 38 samples along the sidewalls and floor of the excavation area. There are no constituents of concern detected at any of the confirmatory sample locations above these criteria.

(Due to the absence of exceedances over applicable screening criteria, the data has not been reproduced here. For transparency, see Table 1 for the soil and floor block data.)

Groundwater

The groundwater investigations were performed to assess groundwater quality and flow conditions at the Site. The previous investigation conducted by GM in 2006 included two groundwater monitoring locations, MW2-1 and MW2-2. In 2011, nine monitoring wells, MW-1 through MW-9 (see Figure 9), were installed, developed and subsequently sampled to assess Site-specific groundwater flow conditions and potential impacts to groundwater from previously discussed historical Site activities.

Static water levels and groundwater samples were collected from all the monitoring wells (Figure 2) during the initial groundwater sampling event that took place between June 27 and July 2, 2012. Subsequently, static water levels were collected on a quarterly basis along with groundwater samples from selected monitoring wells, including MW-2, MW-4, MW-7, MW-9 and MW2-1. These wells were selected for sampling based on the results from the initial groundwater sampling event.

The initial groundwater samples were analyzed for the presence of VOCs, SVOCs, and metals. Subsequently, groundwater samples were analyzed for the presence of dissolved and total selected metals based upon exceedances. The VOC and SVOC results confirm the results from historical groundwater sampling and indicate that SVOCs, in particular PAHs, do not appear to have leached from historical soil impacts at the Site, and that VOCs and SVOCs are not

constituents of concern (COCs) for Site groundwater. Therefore, VOCs and SVOCs were dropped from further analysis during the subsequent sampling events.

Arsenic and lead were the only Site-related metals detected in exceedance of groundwater screening criteria during the investigation. Arsenic was detected above the MDEQ nonresidential drinking water criteria of 0.01 mg/L at MW-2, MW2-1 and MW-7 during each of the four quarterly events. Arsenic was retained for analysis during the subsequent sampling events based on the initial groundwater sampling event results. Arsenic remains undetected in downgradient monitoring well MW-4.

Lead was detected at monitoring well MW-9 during the initial sampling event at a concentration of 0.006 mg/L, which is above the MDEQ nonresidential drinking water criterion of 0.004 mg/L. Lead was retained for analysis during the subsequent sampling events based on the initial groundwater sampling event results. Lead was either not detected or detected at the detection limit of 0.003 mg/L, which is below the drinking water criterion during the second and third sampling events. However, lead was detected above the drinking water criterion at MW-2, MW2-1, MW-7 and MW-9 and during the fourth groundwater sampling event at concentrations ranging from 0.005 mg/L to 0.021 mg/L. Monitoring wells MW-2 and MW-9 had the highest turbidity readings during the fourth sampling event, and MW-7 had its second highest turbidity during this sampling event. The dissolved and total results were within acceptable RPD, except during the March 2013 sampling event when the dissolved lead results in MW-7 and MW-9 were about a half to two thirds the total lead results. The Phase II ESA (O'Brien & Gere, 2007a) analytical results did not indicate that lead was a COC in the area surrounding monitoring wells MW-2, MW2-1, MW-7 and MW-9, and was only detected above the MDEQ nonresidential drinking water protection criterion at one soil sampling location (SS2-14) during the Phase II Investigation. SS2-14 was located near MW-5, and was excavated during the soil removal activities conducted by the former GM Corporation to fill in the former Press Room basement.

Ecological Risks

As discussed on page 4 and in Attachment 2, EPA found there was no suitable ecological habitat to assess or complete migration and exposure pathway to any ecological receptors on site.

Human Health Risks

All post-excavation soil and groundwater analytical results were compared to MDEQ Part 201 default, non-residential criteria for the protection of human health, including:

MDEQ Drinking Water
Groundwater Contact Protection criteria
Soil and Groundwater Volatilization to Indoor Air Inhalation criteria
Infinite Source Volatile Soil Inhalation criteria
Particulate Soil Inhalation criteria
Direct Contact criteria
Drinking Water criteria
Groundwater Contact criteria

There were no exceedances of these criteria except for MDEQ Drinking Water criteria for arsenic and lead. A maximum lead concentration in the groundwater was detected at 0.021 mg/L, above the MDEQ drinking water criteria of 0.004 mg/L. The MDEQ drinking water criteria for lead is more conservative than the federal criteria of 0.015 mg/L. Lead was detected in soil samples that were subsequently removed during the interim measure activities. The remaining impacts within the soil, although below applicable screening criteria, impact groundwater samples. Due to the discontinuous nature of the groundwater within the unconsolidated silty soils, it can be difficult to obtain groundwater samples without some soil entrainment.

The arsenic exceedances in the groundwater were detected at three wells. The highest exceedance was 0.035 mg/L compared to the MDEQ drinking water of 0.01 mg/L. However, the concentrations of arsenic detected in groundwater at the Site are within the range of what has been demonstrated by the United States Geological Survey (USGS) to be local and regional background levels (USGS FS-127-00, 2000)[3]. Elevated arsenic in groundwater is common in southeast Michigan due to glacial till soils that naturally contain arsenic. According to the MDEQ Water Well Viewer database, arsenic concentrations in the regional aquifer range from less than .01 mg/L to greater than 0.05 mg/L in the Site area. This information, in combination with the locations of exceedances not being suggestive of a groundwater plume, indicates that the dissolved phase arsenic is associated with the regional geology and is consistent with background.

Neither the lead nor the arsenic exceedances appear to constitute a groundwater plume based upon the low concentration gradients, the known background concentrations, and the lack of downgradient contamination. The drinking water criteria exceedances can be addressed by a restrictive covenant filed for the property that would prohibit potable use of groundwater at the Site.

The results of the investigations at the Site demonstrates that groundwater at the Site does not present a significant risk under current or future uses of the Site nor do the detected exceedances in the groundwater pose a significant risk due to potential off-site migration as a result of the Interim Measures conducted. Similarly, the confirmatory soil sampling results demonstrate that the Site soils are below the applicable criteria, including the drinking water protection and direct contact criteria.

SUMMARY OF ALTERNATIVES

This Statement of Basis considers a "no action" alternative, institutional controls, the interim measure soil excavations, and pump-and-treat as potential corrective measures for soil and groundwater. The evaluation of these alternatives includes a feasibility screening to assess the applicability and compatibility of the technology with site characteristics. A particular technology or combination of technologies is retained for further evaluation if it can be used effectively to meet remedial goals. The following is a brief description of each alternative considered:

[3] United States Geological Survey, *Arsenic in Groundwater in Genesee County, Michigan,* Fact Sheet FS-127-00, October 2000

Soil Remedy

No Action

The "no action" alternative is a baseline against which all other alternatives are considered. It would include terminating any remedial work currently taking place and eliminating any possible future work or long-term monitoring. The Agency evaluates all remedial alternatives against this baseline.

Institutional Controls

Institutional controls include legal deed restrictions or restrictive covenants, zoning ordinances, and other methods to prevent or reduce exposure to contamination that may result in potentially unacceptable risks for human health and the environment.

Deed restrictions in general are land and water use restrictions filed with the registrar of deeds for the local governing body. These restrictions can provide a means to make the current and future property owners aware of impacts present at the property, in the soil or groundwater. The restriction may, for example, indicate the installation of a groundwater well on the property for consumption or irrigation purposes is prohibited. Another example would include excavation restrictions and precautions as a requirement based upon the presence of deeper soil contamination.

Interim Measure Soil Excavations

As a proposed corrective measure for site soil, the previously described interim measures would be evaluated as potential final remedies. This would include all prior excavation work that has taken place at the site, including: the 2009 mercury "hot spot" soil excavation, the 2009 site-wide soil excavation, and the 2011 floor block and soil excavation. All three interim measures included soil sampling, excavation, confirmatory sampling, and off-site disposal. The mercury hot spot excavation removed and properly disposed of 90 cubic yards of soil. The site-wide soil excavation removed between 3-4' of soil from across the entire 20-acre site. The excavated soil contained PAHs and metals contamination. The 2011 floor block and soil excavation removed over 3,000 tons of PAH-contaminated floor block and soil.

Groundwater Remedy

No Action

The "no action" alternative is a baseline against which all other alternatives are considered. It would include terminating any remedial work currently taking place and eliminating any possible future work or long-term monitoring. The Agency evaluates all remedial alternatives against this baseline.

Institutional Controls

Institutional controls include legal deed restrictions or restrictive covenants, zoning ordinances, and other methods to prevent or reduce exposure to contamination that may result in potentially unacceptable risks for human health and the environment. The restriction may indicate the installation of a groundwater well on the property for consumption or irrigation purposes is prohibited.

Pump and Treat

This alternative involves pumping groundwater from impacted areas of the site into a centralized treatment system and discharging the treated groundwater either to a publicly owned treatment works (POTW) sanitary sewer, or through a permitted National Pollutant Discharge Elimination System (NPDES) outfall to surface water, which would likely be to the storm water ditch located adjacent to the Site that eventually discharges to Gibson Drain. The groundwater pump and treat system would include a series of wells outfitted with pumps to extract the groundwater, conveyance piping to transport the groundwater to the on-site treatment system and from the system to the discharge point, a treatment system designed to remove contamination and various electrical control systems needed to operate the entire system.

Proposed Remedial Alternatives

The remedial alternatives described above have been considered either independently or in combination for consideration as the proposed corrective measures alternative. The remedial alternatives further considered are as follows:

Soil Remedy Alternatives

Alternative 1: No Action
Alternative 2: Interim Measure Excavations and Institutional Controls

Groundwater Remedy Alternatives

Alternative 1: No Action
Alternative 2: Institutional Controls
Alternative 3: Pump-and-treat

EVALUATION OF THE PROPOSED REMEDY AND ALTERNATIVES

The evaluation of corrective measures alternatives considers the degree to which each potential corrective measure alternative satisfies EPA's threshold and balancing criteria. Remedies attaining all four threshold criteria are then weighed against the balancing criteria. The criteria, defined below, assist in determining the best possible remedial option.

Threshold criteria

1. Overall Protection: This criterion considers the ability of the remedial alternatives to protect human health and the environment, for both current and reasonably anticipated future receptors.
2. Attainment of Media Cleanup Standards: This criterion considers the ability of the remedial alternatives to attain the cleanup standards for that specific media.
3. Controlling the Sources of Releases: To the extent practicable, the remedial alternative must control the source of the release. This criterion considers the ability of the remedial alternatives to reduce or eliminate any further releases of hazardous substances that would pose a risk to human health and the environment.
4. Compliance with Waste Management Standards: This criterion considers the ability of the remedial alternatives to comply with applicable standards for waste management (*i.e.*, hazardous waste storage and transportation regulations, emissions limitations, etc.).

Balancing criteria

1. Long-term Reliability and Effectiveness: This criterion considers both the level of threat posed by hazardous constituents remaining in place and the adequacy of the remedial alternative and the risk associated with any treatment residuals compared to untreated waste.
2. Reduction of Toxicity, Mobility, or Volume of Wastes: This criterion considers the ability of the remedial alternatives to reduce the toxicity, mobility, or volume of waste significantly and permanently.
3. Short-term Effectiveness: This criterion evaluates the effects of the remedial alternatives on human health and the environment during their implementation period. It considers factors such as impacts from remedy construction, transportation, and air quality.
4. Implementability: This criterion considers the technical and administrative feasibility of implementing the selected remedial alternative.
5. Cost: This criterion considers the cost effectiveness of each alternative. Cost effectiveness is evaluated by comparing the costs proportional to the effectiveness achieved by the remedial alternative.
6. State and Community Acceptance: This criterion evaluates the issues and concerns the local community may have regarding the alternatives. U.S. EPA encourages community involvement in remedial alternatives and community acceptance will be considered in the remedial alternative selection. This criterion evaluates the technical and administrative issues and concerns the State may have regarding the alternatives. U.S. EPA coordinates with State agencies and State acceptance will be considered in the remedial alternative selection.
7. Sustainability: This criterion considers the sustainability of each alternative with regard to energy requirements; air emissions; water requirements including impacts on water resources; land and ecosystem impacts; and material consumption and waste generation. The sustainability evaluation was used in conjunction with the core elements of the RCRA corrective action alternatives evaluation to identify corrective measures alternatives that would balance effectiveness and sustainability.

Soil Remedy Alternatives

Alternative 1: No Action
No further action would not satisfy the threshold and balancing criterion. The extensive soil excavations that have already taken place at the site have eliminated any soil exceedances above industrial direct contact screening criteria, volatilization to indoor air, and groundwater protection criteria. However, "No Action" as a proposed remedy would not appropriately memorialize the interim measures or document the need for institutional controls since the site soil was not remediated to residential standards.

Alternative 2: Interim Measure Excavations and Institutional Controls
As previously stated, the prior soil excavations that took place as interim measures effectively remediated the site and, therefore, satisfy the threshold criteria. The excavation and off-site disposal of site-wide soil and contaminated floor blocks has left the site soil at levels below the cleanup standards. The site soil is currently below the industrial direct contact, volatilization to indoor air, and groundwater protection standards. These remedial actions also controlled potential secondary sources by eliminating the potential for soil contamination to leach into and contaminate the groundwater. The soil excavations also achieved the short and long-term effectiveness balancing criterion. The addition of the institutional controls (ICs), in the form of a deed restriction, will further support the long-term effectiveness of this remedy. The current fence that surrounds the perimeter of the site will also be maintained. The soil removal included confirmatory sampling compared to non-residential, industrial standards. The IC will ensure the future use of the land will remain industrial, in accordance with the cleanup.

Groundwater Remedy Alternatives

Alternative 1: No Action
No further action with the site groundwater would not prevent future land owners from using the groundwater for potable purposes, which would not be appropriate. Although it is unlikely for any groundwater use to occur from the perched water sampled on-site, and that water is minimally impacted, no further action is not appropriate.

Alternative 2: Institutional Controls
A groundwater use restriction filed on the property would meet the threshold criteria. Although the on-site shallow groundwater does not represent a potable aquifer based upon yield (the municipal drinking water wells are screened in bedrock around 300 feet deep), the institutional controls will serve to conservatively protect future landowners by notifying them of the impacts. Given the minimal nature of the impacts, and most screening criteria being met, the groundwater use restriction would also satisfy the balancing criteria and is the recommended remedy for groundwater contamination.

Alternative 3: Pump-and-treat
A groundwater pump-and-treat system would not be appropriate for this site given the nature of the impacts and the geology. On-site groundwater is impacted by one constituent, lead, that is very slightly above the drinking water criteria in limited locations. The presence of a plume is not discernable based on the low concentrations, absence of a gradient, and the limited locations. This alternative would not effectively achieve the threshold or balancing criteria based upon the

conceptual site model. Specifically, the "implementability" and "sustainability" of designing, permitting, and constructing such a system for these site circumstances would not be appropriate.

Cost

The cost to date for the site work, including the interim measure conducted under this Agreement and proposed as a final remedial alternative, is approximately $500,000. The estimated cost of the soil and groundwater institutional controls alternative is $4,000. The estimated cost to install a pump-and-treat system and operate it for five years is $455,000.

EPA's Proposed Remedy

Based upon a review of all the alternatives described above, EPA is proposing that the completed soil interim measures have adequately addressed the risk at the site and should be considered the final remedy with the addition of implementation of Institutional Controls at the site. For impacted groundwater, implementation of groundwater use restriction is appropriate and adequate to address the existing risk.

PUBLIC PARTICIPATION

EPA solicits input from the community on the cleanup methods proposed under each of the alternatives presented, and on EPA's preferred alternative as described in this document. EPA has set a public comment period from April 19 – May 19, 2016, to encourage public participation in the selection process. We encourage community members to submit any comments regarding these proposed remedies in writing by May 19, 2016. If requested during the public comment period, EPA will also host a public meeting to hear comments. To request a public meeting, contact EPA Project Manager Michelle Kaysen, below.

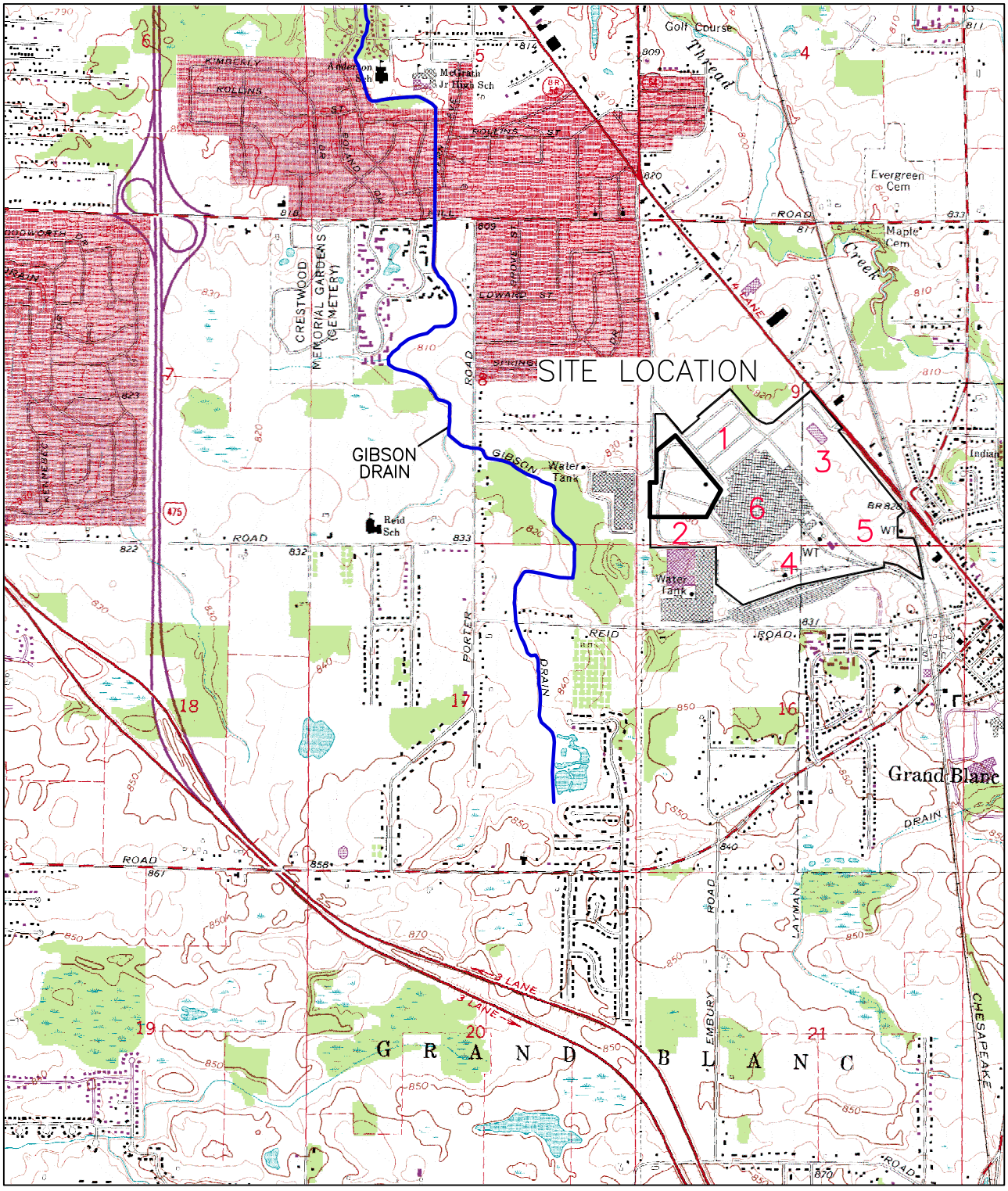
The EPA administrative record is available at the following locations (please call for hours):

EPA, Region 5
7th Floor Record Center
77 W. Jackson Blvd.
Chicago, IL 60604
(312) 886-4253

Grand Blanc-McFarlen Library
515 Perry Road
Grand Blanc, MI 48439
(810) 694-5310

EPA will summarize public comments and provide responses in the Response to Comments. EPA will draft the Response to Comments at the conclusion of the public comment period and incorporate the Response to Comments into the EPA administrative record. To send written comments or obtain further information, contact:

Michelle Kaysen (LU-9J)
77 W. Jackson Blvd
Chicago, IL 60604
(312) 886-4253
kaysen.michelle@epa.gov



MICHIGAN
QUADRANGLE LOCATION

14774/51434.001

RACER TRUST
DORT HIGHWAY LAND
GRAND BLANC, MICHIGAN

SITE LOCATION

0 1
APPROXIMATE SCALE
ONE MILE

TRUE NORTH

OBRIEN & GERE
ENGINEERS INC.

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03/26/14 078 CSY

NOTE: AERIAL PHOTO TAKEN IN APRIL 2012
SOURCE: ESRI®

— APPROXIMATE RACER TRUST PROPERTY LINE

14774/51434.002

RACER TRUST
DORT HIGHWAY LAND
GRAND BLANC, MICHIGAN

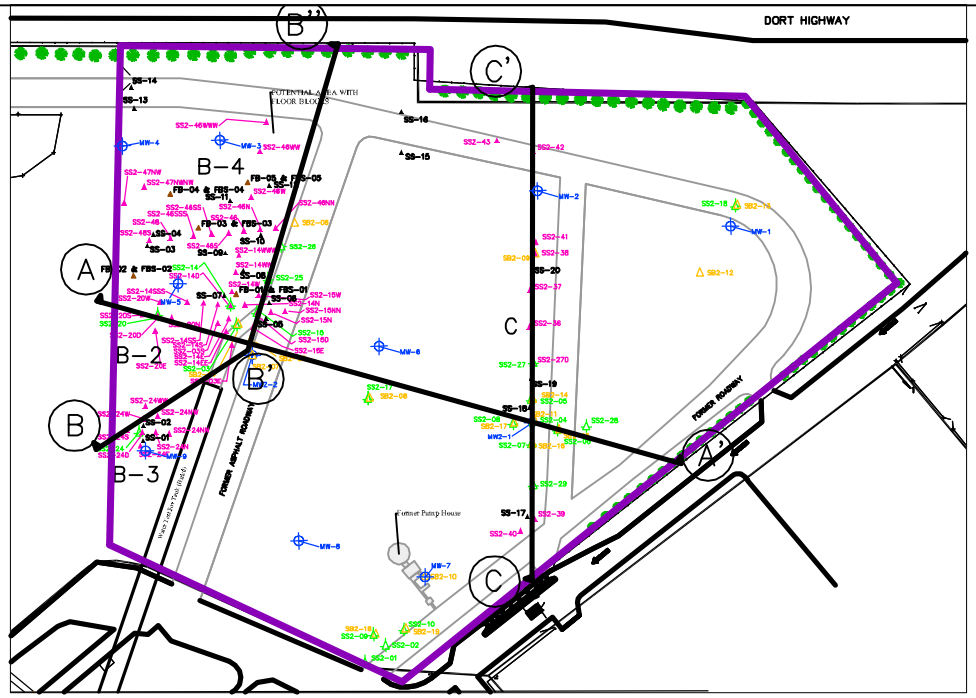
SITE AREA AERIAL PHOTO

0 4,000

APPROXIMATE SCALE
1" = 1,820'

TRUE NORTH

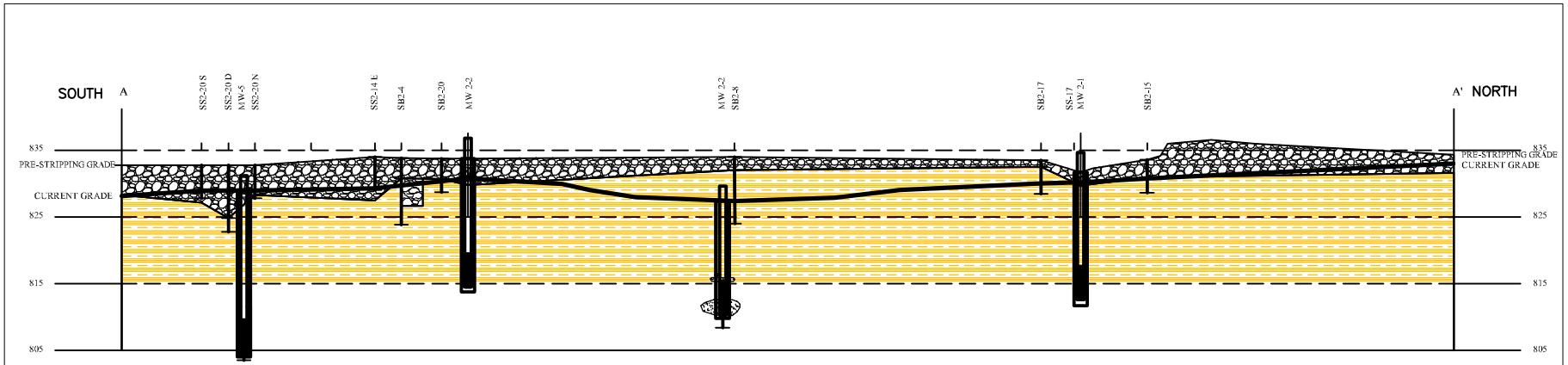
O'BRIEN & GERE ENGINEERS INC.



STATEMENT OF BASIS:
FIGURE 3A

LEGEND
- FILL SOIL
- CLAY
- CROSS SECTION
- SAND SEAM

RACER TRUST
DORT HIGHWAY LAND
GRAND BLANC, MICHIGAN



CROSS SECTION A-A'

GEOLOGIC CROSS SECTIONS

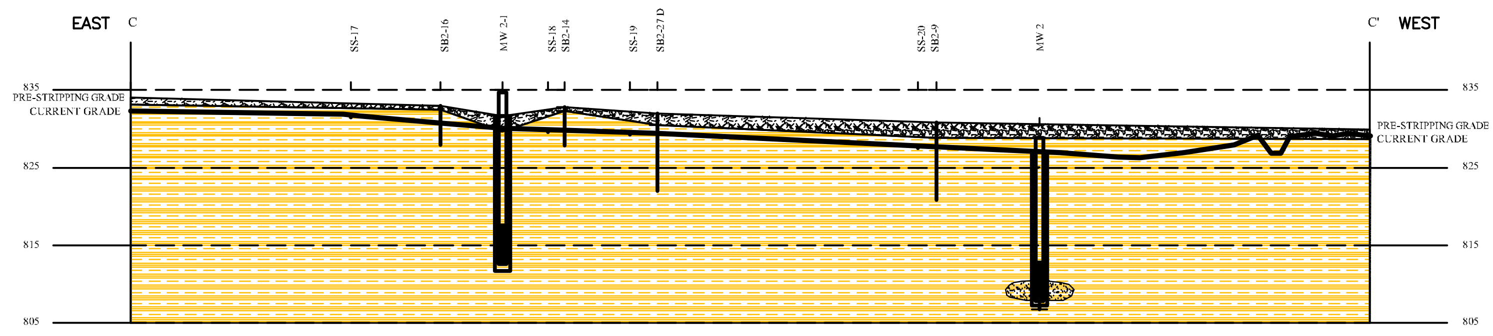
8 0 8
VERTICLE SCALE

40 0 40
HORIZONTAL SCALE

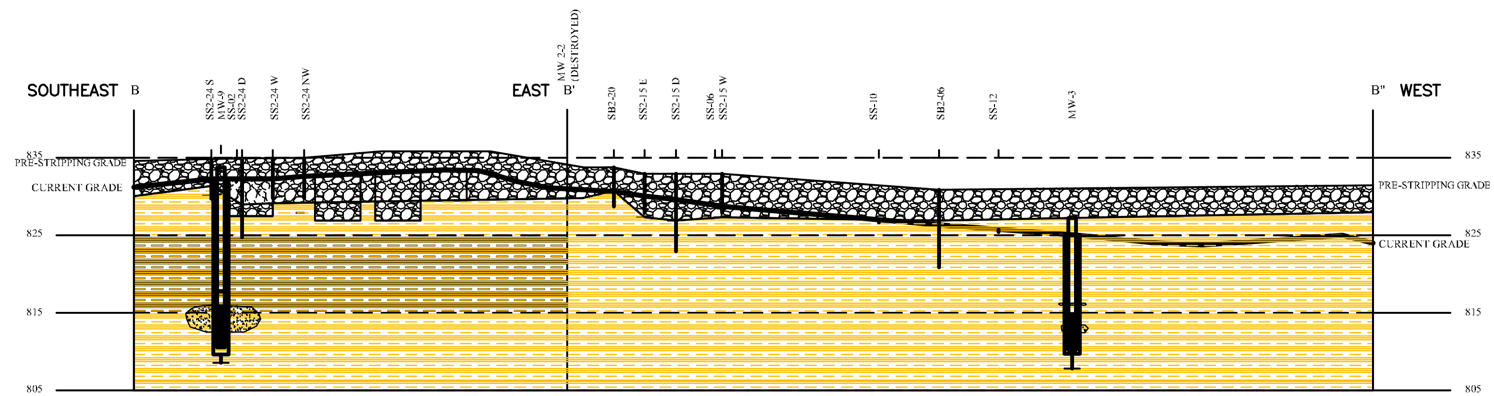
FILE NO. 15388-51434.003

O'BRIEN & GERE ENGINEERS, INC.

STATEMENT OF BASIS:
FIGURE 3B



CROSS SECTION C-C'



CROSS SECTION B-B'-B"

LEGEND

- FILL SOIL
- CLAY
- CROSS SECTION
- SAND SEAM

RACER TRUST
DORT HIGHWAY LAND
GRAND BLANC, MICHIGAN

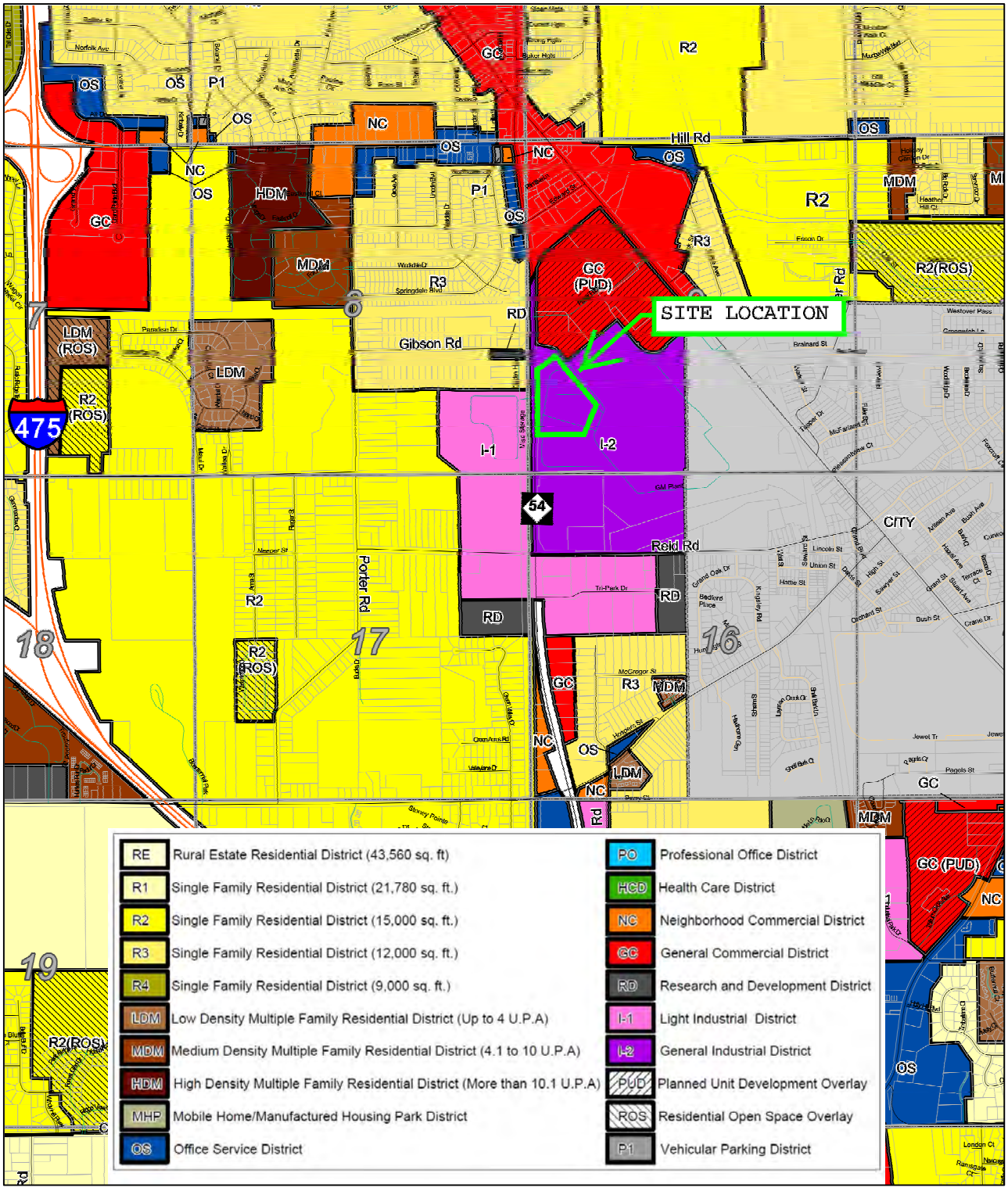
GEOLOGIC CROSS SECTIONS

8 0 8
VERTICLE SCALE

40 0 40
HORIZONTAL SCALE

FILE NO. 15388-51434.003

O'BRIEN & GERE ENGINEERS, INC.



MICHIGAN
SITE LOCATION

14774/51434.004

RACER TRUST
DORT HIGHWAY LAND
GRAND BLANC, MICHIGAN

SITE AREA ZONING MAP

0 1

APPROXIMATE SCALE
ONE MILE

TRUE NORTH

O'BRIEN & GERE
ENGINEERS INC.

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03/27/14 078 CSY

NOTE: AERIAL PHOTO TAKEN IN APRIL 2012
SOURCE: ESRI®

— APPROXIMATE RACER TRUST PROPERTY LINE

14774/51434.002

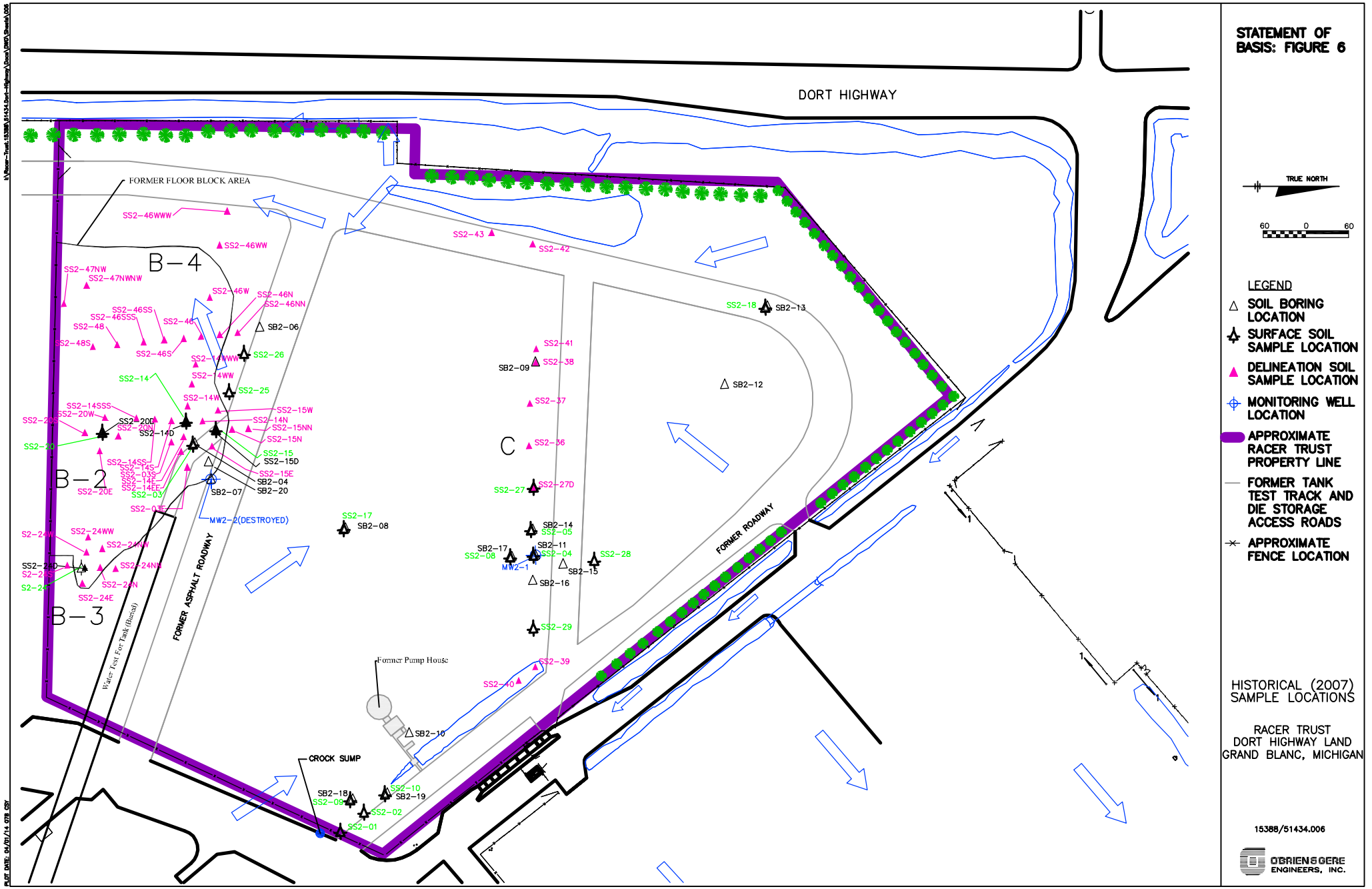
RACER TRUST
DORT HIGHWAY LAND
GRAND BLANC, MICHIGAN

SITE AERIAL PHOTO

0 440
APPROXIMATE SCALE
1" = 200'

TRUE NORTH

O'BRIEN & GERE ENGINEERS INC.



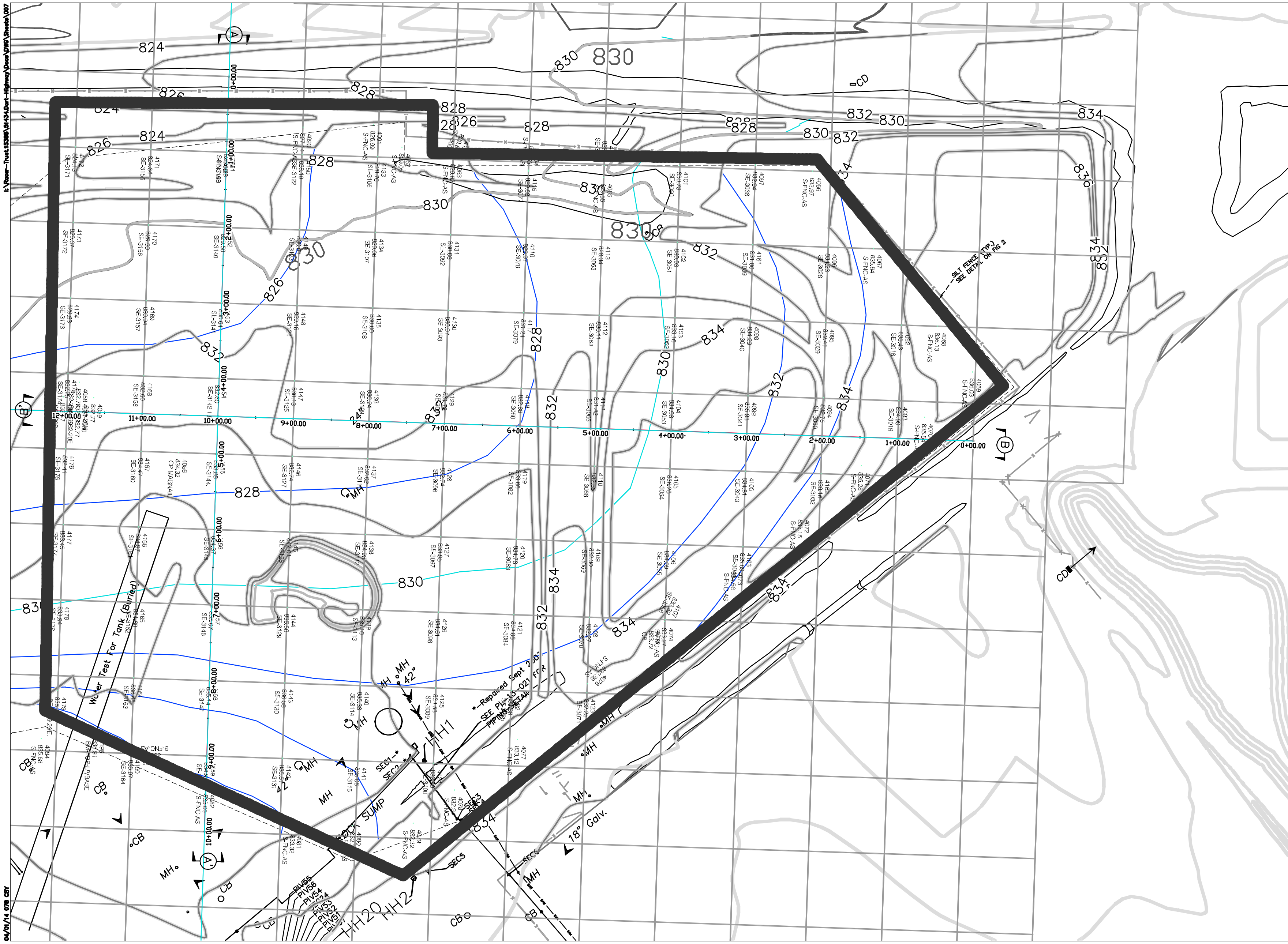
STATEMENT OF BASIS: FIGURE 6

HISTORICAL (2007) SAMPLE LOCATIONS

RACER TRUST
DORT HIGHWAY LAND
GRAND BLANC, MICHIGAN

15388/51434.006

OBRIEN & GERE ENGINEERS, INC.



STATEMENT OF BASIS: FIGURE 7

NOTES:

1. DRAWING FOR PRELIMINARY TAKE-OFFS ONLY. PROPOSED CONTOURS TO MATCH EXISTING AT BOUNDARY OF BORROW AREA. BOUNDARY OF BORROW AREA DELINEATED BY SILT FENCE LOCATION.

2. CONTRACTOR TO FOLLOW SOIL EROSION AND SEDIMENTATION REQUIREMENTS PER EXISTING PROJECT REQUIREMENTS.

TRUE NORTH

RACER TRUST
DORT HIGHWAY LAND

GRAND BLANC, MICHIGAN

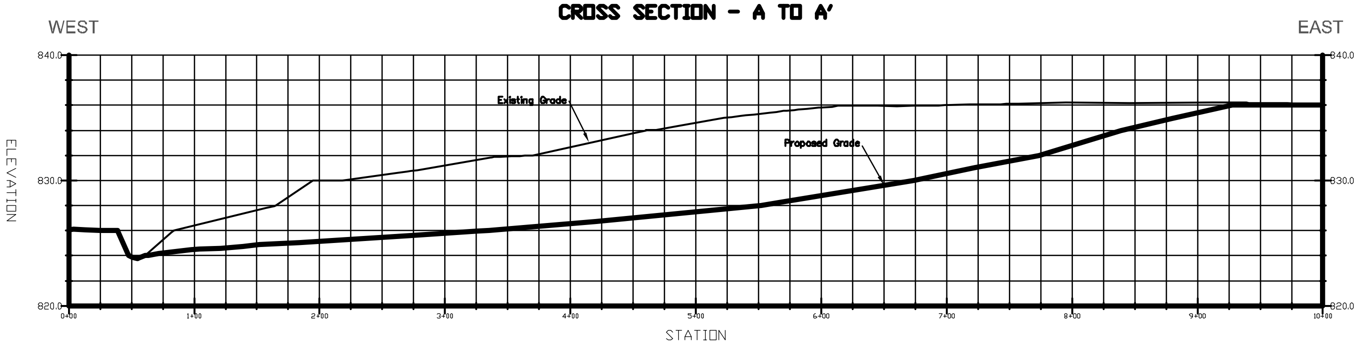
CUT & FILL MAP W/ GRID AS OF 2007

60 0 60

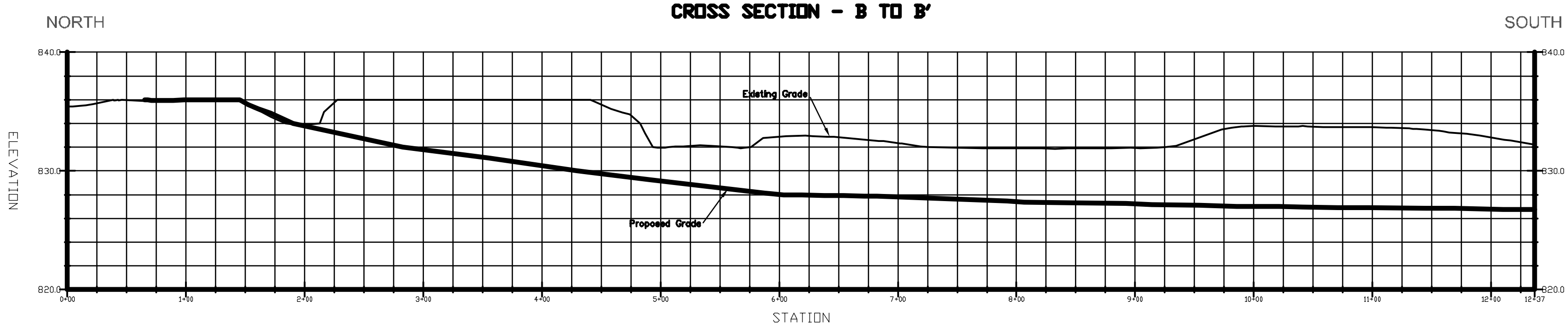
15388/51434.006

O'BRIEN & GERE

CROSS SECTION - A TO A'



CROSS SECTION - B TO B'



STATEMENT OF BASIS: FIGURE 8

RACER TRUST
DORT HIGHWAY LAND

GRAND BLANC, MICHIGAN

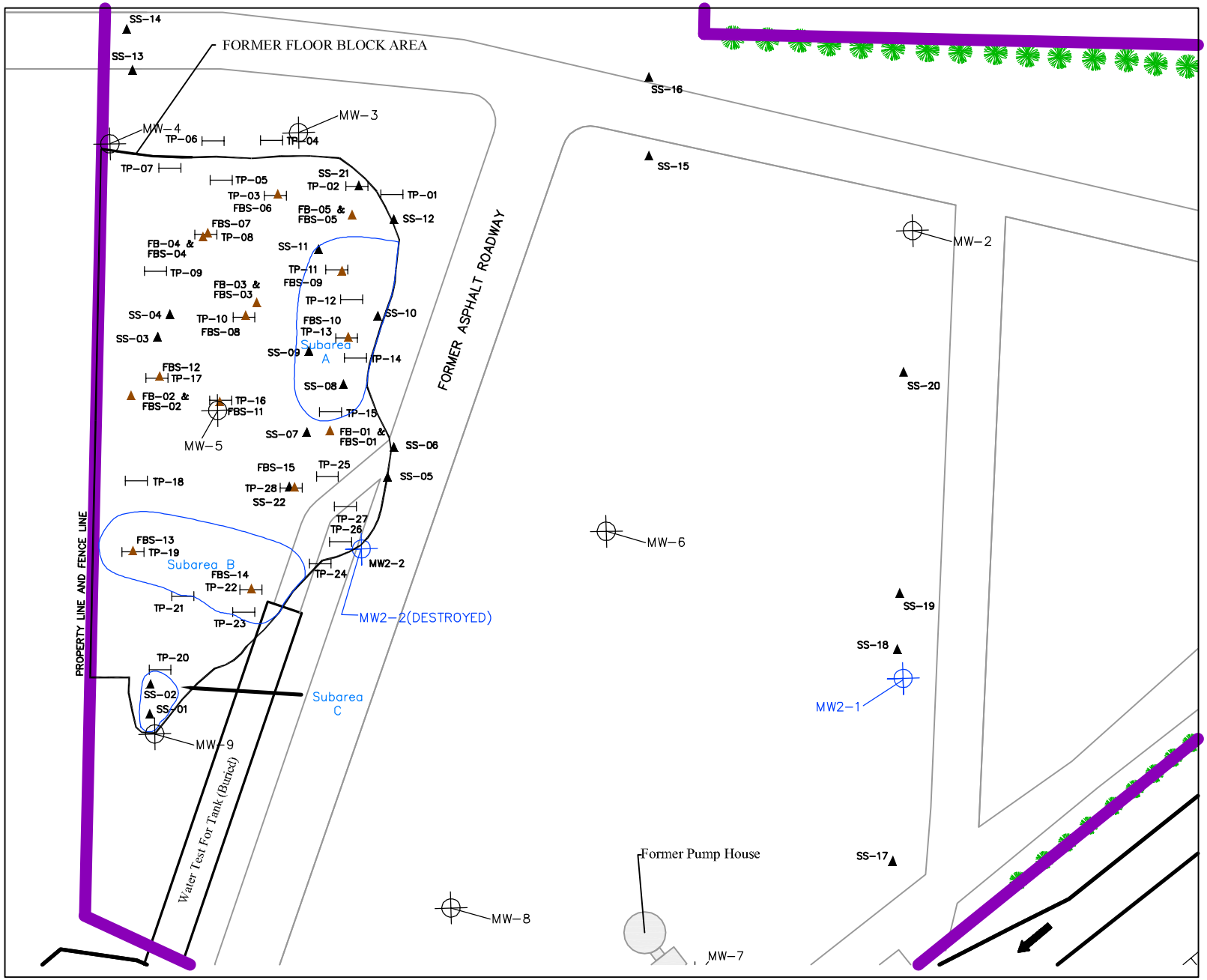
CUT & FILL PROFILE VIEWS AS OF 2007

5 0 5
VERTICAL SCALE

50 0 50
HORIZONTAL SCALE

15388/51434.008

O'BRIEN & GERE



STATEMENT OF BASIS: FIGURE 9

LEGEND

- MONITORING WELL LOCATION
- TEMPORARY MONITORING WELI LOCATION
- SURFACE SOIL/SOIL SAMPLE LOCATION
- FLOOR BLOCK & ASSOCIATED SOIL SAMPLE LOCATION
- TEST PIT LOCATION

TRUE NORTH

RACER TRUST
DORT HIGHWAY LAND
GRAND BLANC, MICHIGAN

2011 SITE CONDITIONS & FLOOR BLOCK INVESTIGATION SAMPLING LOCATIONS

80 0 80

15388/51434.009

O'BRIEN & GERE ENGINEERS INC.

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PLOT DATE: 04/01/14 078 CSY

Statement of Basis: Table 1
Summary of 2011 Soil, Floor Block and Confirmation Sample Analytical Results
RACER Trust - Dort Highway Land
Grand Blanc, Michigan

Parameter		MDEQ Criteria: Non-Residential Drinking Water Protection Criteria	MDEQ Criteria: Non-Residential Direct Contact Criteria	SS-03 (0'-0.1')	SS-04 (0'-0.1')	SS-05 (0'-0.1')	SS-06 (0'-0.1')	SS-07 (0'-0.1')	SS-07 CO-LOCATED (0'-0.1')	SS-12 (0'-0.1')	SS-13 (0'-0.1')	SS-14 (0'-0.1')	SS-14 CO-LOCATED (0'-0.1')
Arsenic	mg/kg	4.6	37	2.07	2.56	--	--	2.5	2.19	1.41	1.78	0.65	0.74
Barium	mg/kg	1300	1.3E+05	41.5	55	--	--	37	30.2	57.8	44.1	93.5	66
Cadmium	mg/kg	6	2100	<0.20	<0.20	--	--	<0.20	0.2	<0.20	0.24	0.2	<0.20
Chromium	mg/kg	1.0E+6 (D)	1.0E+6 (D)	3.82	2.96	--	--	7.45	3.27	3.57	2.97	3.94	3.53
Lead (Total)	mg/kg	700	900 (DD)	9.79	6	--	--	35	12.6	4.82	8.44	6.94	8.68
Acenaphthene	µg/kg	8.8E+05	1.3E+08	--	--	<300	<300	<300	<300	--	<330	<330	<330
Acenaphthylene	µg/kg	17000	5.2E+06	--	--	<300	<300	<300	<300	--	<330	<330	<330
Anthracene	µg/kg	41000	7.3E+08	--	--	<300	<300	600	<300	--	<330	<330	<330
Benzo(a)anthracene	µg/kg	NLL	80000	--	--	<300	<300	2,000	1,000	--	<330	<330	<330
Benzo(a)pyrene	µg/kg	NLL	8000	--	--	<300	<300	3,200	1,400	--	<330	<330	<330
Benzo(b)fluoranthene	µg/kg	NLL	80000	--	--	300	400	5,100	2,300	--	<330	<330	<330
Benzo(k)fluoranthene	µg/kg	NLL	8.0E+05	--	--	<300	300	5,200	2,300	--	<330	<330	<330
Benzo(ghi)perylene	µg/kg	NLL	7.0E+06	--	--	<300	<300	1,600	900	--	<330	<330	<330
Chrysene	µg/kg	NLL	8.0E+06	--	--	<300	<300	2,500	1,300	--	<330	<330	<330
Dibenzo(ah)anthracene	µg/kg	NLL	8000	--	--	<300	<300	<300	<300	--	<330	<330	<330
Fluoranthene	µg/kg	7.30E+05	1.3E+08	--	--	<300	<300	4,600	2,200	--	<330	<330	<330
Fluorene	µg/kg	8.9E+05	8.7E+07	--	--	<300	<300	300	<300	--	<330	<330	<330
Indeno(1,2,3-cd)pyrene	µg/kg	NLL	80000	--	--	<300	<300	1,600	900	--	<330	<330	<330
Naphthalene	µg/kg	1.00E+05	5.2E+07	--	--	<300	<300	<300	<300	--	<330	<330	<330
Phenanthrene	µg/kg	1.60E+05	5.2E+06	--	--	<300	<300	2,600	1,100	--	<330	<330	<330
Pyrene	µg/kg	4.8E+05	8.4E+07	--	--	<300	<300	3,800	1,700	--	<330	<330	<330
2-Methylnaphthalene	µg/kg	1.70E+05	2.6E+07	--	--	<300	<300	<300	<300	--	<330	<330	<330
1-Methylnaphthalene	µg/kg	NC	NC	--	--	<300	<300	<300	<300	--	<330	<330	<330

Exceeds nonresidential drinking water protection criteria

Exceeds nonresidential direct contact criteria

(D) Calculated criterion exceeds 100 percent

(DD) Hazardous substances causes developmental effects

(NLL) Means hazardous substances is not likely to leach under most soil conditions

(ID) Means insufficient data to develop criterion

(NC) Means no criterion or value is available

-- Not analyzed

* Elevated reporting limit for PAHs due to high target concentration

Equipment blanks, field blanks, trip blank, methanol blank were non-detect;
except field blank (FBK-01) which had a detection of 0.006 mg/L for barium

Statement of Basis: Table 1
Summary of 2011 Soil, Floor Block and Confirmation Sample Analytical Results
RACER Trust - Dort Highway Land
Grand Blanc, Michigan

Parameter		MDEQ Criteria: Non-Residential Drinking Water Protection Criteria	MDEQ Criteria: Non-Residential Direct Contact Criteria	SS-15 (0'-0.1')	SS-16 (0'-0.1')	SS-16 DUP-01 (0'-0.1')	SS-17 (0'-0.1')	SS-18 (0'-0.1')	SS-19 (0'-0.1')	SS-20 (0'-0.1')	SS-21 (2'-4')	SS-22 (0'-1.5')	SS-22 (0'-1.5') CO-LOCATED
Arsenic	mg/kg	4.6	37	1.35	1.8	1.92	--	--	--	--	--	--	--
Barium	mg/kg	1300	1.3E+05	63.6	53.2	44.4	--	--	--	--	--	--	--
Cadmium	mg/kg	6	2100	<0.20	0.21	0.22	--	--	--	--	--	--	--
Chromium	mg/kg	1.0E+6 (D)	1.0E+6 (D)	3.87	6.31	6.06	--	--	--	--	--	--	--
Lead (Total)	mg/kg	700	900 (DD)	7.36	12.6	13	--	--	--	--	--	--	--
Acenaphthene	µg/kg	8.8E+05	1.3E+08	<330	<330	<330	400	<300	<300	<300	<300	<300	<300
Acenaphthylene	µg/kg	17000	5.2E+06	<330	<330	<330	<300	<300	<300	<300	<300	<300	<300
Anthracene	µg/kg	41000	7.3E+08	<330	<330	<330	2,400	<300	<300	<300	<300	<300	<300
Benzo(a)anthracene	µg/kg	NLL	80000	<330	<330	<330	3,000	<300	<300	<300	<300	<300	<300
Benzo(a)pyrene	µg/kg	NLL	8000	<330	<330	<330	2,700	<300	<300	<300	<300	<300	<300
Benzo(b)fluoranthene	µg/kg	NLL	80000	<330	<330	<330	5,500	<300	<300	<300	<300	<300	<300
Benzo(k)fluoranthene	µg/kg	NLL	8.0E+05	<330	<330	<330	5,500	<300	<300	<300	<300	<300	<300
Benzo(ghi)perylene	µg/kg	NLL	7.0E+06	<330	<330	<330	900	<300	<300	<300	<300	<300	<300
Chrysene	µg/kg	NLL	8.0E+06	<330	<330	<330	3,100	<300	<300	<300	<300	<300	<300
Dibenzo(ah)anthracene	µg/kg	NLL	8000	<330	<330	<330	<300	<300	<300	<300	<300	<300	<300
Fluoranthene	µg/kg	7.30E+05	1.3E+08	<330	<330	<330	6,800	<300	<300	<300	<300	400	<300
Fluorene	µg/kg	8.9E+05	8.7E+07	<330	<330	<330	500	<300	<300	<300	<300	<300	<300
Indeno(1,2,3-cd)pyrene	µg/kg	NLL	80000	<330	<330	<330	900	<300	<300	<300	<300	<300	<300
Naphthalene	µg/kg	1.00E+05	5.2E+07	<330	<330	<330	<300	<300	<300	<300	<300	<300	<300
Phenanthrene	µg/kg	1.60E+05	5.2E+06	<330	<330	<330	5,700	<300	<300	<300	<300	<300	<300
Pyrene	µg/kg	4.8E+05	8.4E+07	<330	<330	<330	6,200	<300	<300	<300	<300	<300	<300
2-Methylnaphthalene	µg/kg	1.70E+05	2.6E+07	<330	<330	<330	<300	<300	<300	<300	<300	<300	<300
1-Methylnaphthalene	µg/kg	NC	NC	<330	<330	<330	<300	<300	<300	<300	<300	<300	<300

Exceeds nonresidential drinking water protection criteria

Exceeds nonresidential direct contact criteria

(D) Calculated criterion exceeds 100 percent

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Statement of Basis: Table 1
Summary of 2011 Soil, Floor Block and Confirmation Sample Analytical Results
RACER Trust - Dort Highway Land
Grand Blanc, Michigan

Parameter		MDEQ Criteria: Non-Residential Drinking Water Protection Criteria	MDEQ Criteria: Non-Residential Direct Contact Criteria	FBS-06 (0'-0.1')	FBS-07 (0'-0.1')	FBS-11 (0'-0.1')	FBS-12 (0'-0.1')
Arsenic	mg/kg	4.6	37	--	--	--	--
Barium	mg/kg	1300	1.3E+05	--	--	--	--
Cadmium	mg/kg	6	2100	--	--	--	--
Chromium	mg/kg	1.0E+6 (D)	1.0E+6 (D)	--	--	--	--
Lead (Total)	mg/kg	700	900 (DD)	--	--	--	--
Acenaphthene	µg/kg	8.8E+05	1.3E+08	<300	300	600	2,100
Acenaphthylene	µg/kg	17000	5.2E+06	<300	<300	<300	<300
Anthracene	µg/kg	41000	7.3E+08	<300	500	900	2,400
Benzo(a)anthracene	µg/kg	NLL	80000	<300	1,200	2,100	5,100
Benzo(a)pyrene	µg/kg	NLL	8000	<300	1,400	2,400	5,700
Benzo(b)fluoranthene	µg/kg	NLL	80000	<300	2,300	4,000	9,400
Benzo(k)fluoranthene	µg/kg	NLL	8.0E+05	<300	2,300	4,000	9,900
Benzo(ghi)perylene	µg/kg	NLL	7.0E+06	<300	800	1,300	2,800
Chrysene	µg/kg	NLL	8.0E+06	<300	1,300	2,500	5,900
Dibenzo(ah)anthracene	µg/kg	NLL	8000	<300	<300	<300	<300
Fluoranthene	µg/kg	7.30E+05	1.3E+08	<300	3,300	6,000	14,700
Fluorene	µg/kg	8.9E+05	8.7E+07	<300	400	700	2,100
Indeno(1,2,3-cd)pyrene	µg/kg	NLL	80000	<300	800	1,300	2,800
Naphthalene	µg/kg	1.00E+05	5.2E+07	<300	<300	<300	700
Phenanthrene	µg/kg	1.60E+05	5.2E+06	<300	2,500	4,500	12,800
Pyrene	µg/kg	4.8E+05	8.4E+07	<300	2,400	4,200	10,500
2-Methylnaphthalene	µg/kg	1.70E+05	2.6E+07	<300	<300	<300	400
1-Methylnaphthalene	µg/kg	NC	NC	<300	<300	<300	<300

Exceeds nonresidential drinking water protection criteria

Exceeds nonresidential direct contact criteria

(D) Calculated criterion exceeds 100 percent

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Statement of Basis: Table 1
Summary of 2011 Soil, Floor Block and Confirmation Sample Analytical Results
RACER Trust - Dort Highway Land
Grand Blanc, Michigan

Parameter		MDEQ Criteria		CS-A-1 (0.5')	CS-A-2 (0.5')	CS-A-3 (0.5')	CS-A-4 (0.5')	CS-A-6 (Reconfirmation Sample for CS-A-5) (0.5')	CF-A-1 (1.0')	CF-A-2 (1.0')
		Nonresidential Drinking Water Protection Criteria	Nonresidential Direct Contact Criteria							
Acenaphthene	µg/kg	8.8E+05	1.3E+08	<300	<300	<300	<300	<300	<300	<300
Acenaphthylene	µg/kg	17000	5.2E+06	<300	<300	<300	<300	<300	<300	<300
Anthracene	µg/kg	41000	7.3E+08	<300	300	<300	<300	<300	<300	<300
Benzo(a)anthracene	µg/kg	NLL	80000	<300	800	<300	<300	<300	<300	<300
Benzo(a)pyrene	µg/kg	NLL	8000	<300	800	<300	<300	<300	<300	<300
Benzo(b)fluoranthene	µg/kg	NLL	80000	<300	1,400	<300	<300	<300	<300	<300
Benzo(k)fluoranthene	µg/kg	NLL	8.0E+05	<300	1,400	<300	<300	<300	<300	<300
Benzo(ghi)perylene	µg/kg	NLL	7.0E+06	<300	500	<300	<300	<300	<300	<300
Chrysene	µg/kg	NLL	8.0E+06	<300	800	<300	<300	<300	<300	<300
Dibenzo(ah)anthracene	µg/kg	NLL	8000	<300	<300	<300	<300	<300	<300	<300
Fluoranthene	µg/kg	7.30E+05	1.3E+08	<300	2,100	<300	<300	<300	<300	<300
Fluorene	µg/kg	8.9E+05	8.7E+07	<300	<300	<300	<300	<300	<300	<300
Indeno(1,2,3-cd)pyrene	µg/kg	NLL	80000	<300	400	<300	<300	<300	<300	<300
Naphthalene	µg/kg	1.00E+05	5.2E+07	<300	<300	<300	<300	<300	<300	<300
Phenanthrene	µg/kg	1.60E+05	5.2E+06	<300	1,500	<300	<300	<300	<300	<300
Pyrene	µg/kg	4.8E+05	8.4E+07	<300	1,600	<300	<300	<300	<300	<300
2-Methylnaphthalene	µg/kg	1.70E+05	2.6E+07	<300	<300	<300	<300	<300	<300	<300
1-Methylnaphthalene	µg/kg	NC	NC	<300	<300	<300	<300	<300	<300	<300

Exceeds nonresidential drinking water protection criteria

Exceeds nonresidential direct contact criteria

CS-A-4 - Indicates sidewall confirmatory sample number 4 from Subarea A

CF-B-3 - Indicates floor confirmatory sample number 3 from Subarea B

(D) Calculated criterion exceeds 100 percent

(DD) Hazardous substances causes developmental effects

(NLL) Means hazardous substances is not likely to leach under most soil conditions

(ID) Means insufficient data to develop criterion

(NC) Means no criterion or value is available

-- Not analyzed

Statement of Basis: Table 1
Summary of 2011 Soil, Floor Block and Confirmation Sample Analytical Results
RACER Trust - Dort Highway Land
Grand Blanc, Michigan

Parameter		MDEQ Criteria		CF-A-3 (1.0')	CF-A-4 (1.0')	CF-A-5 (1.0')	CF-A-6 (1.0')	CF-A-7 (1.0')	CF-A-8 (1.0')	CF-A-9 (1.0')
		Nonresidential Drinking Water Protection Criteria	Nonresidential Direct Contact Criteria							
Acenaphthene	µg/kg	8.8E+05	1.3E+08	<300	<300	<300	<300	<300	<300	<300
Acenaphthylene	µg/kg	17000	5.2E+06	<300	<300	<300	<300	<300	<300	<300
Anthracene	µg/kg	41000	7.3E+08	<300	<300	<300	<300	<300	<300	<300
Benzo(a)anthracene	µg/kg	NLL	80000	<300	<300	<300	<300	<300	<300	<300
Benzo(a)pyrene	µg/kg	NLL	8000	<300	<300	<300	<300	<300	<300	<300
Benzo(b)fluoranthene	µg/kg	NLL	80000	<300	<300	<300	<300	<300	<300	<300
Benzo(k)fluoranthene	µg/kg	NLL	8.0E+05	<300	<300	<300	<300	<300	<300	<300
Benzo(ghi)perylene	µg/kg	NLL	7.0E+06	<300	<300	<300	<300	<300	<300	<300
Chrysene	µg/kg	NLL	8.0E+06	<300	<300	<300	<300	<300	<300	<300
Dibenzo(ah)anthracene	µg/kg	NLL	8000	<300	<300	<300	<300	<300	<300	<300
Fluoranthene	µg/kg	7.30E+05	1.3E+08	<300	<300	<300	<300	<300	<300	<300
Fluorene	µg/kg	8.9E+05	8.7E+07	<300	<300	<300	<300	<300	<300	<300
Indeno(1,2,3-cd)pyrene	µg/kg	NLL	80000	<300	<300	<300	<300	<300	<300	<300
Naphthalene	µg/kg	1.00E+05	5.2E+07	<300	<300	<300	<300	<300	<300	<300
Phenanthrene	µg/kg	1.60E+05	5.2E+06	<300	<300	<300	<300	<300	<300	<300
Pyrene	µg/kg	4.8E+05	8.4E+07	<300	<300	<300	<300	<300	<300	<300
2-Methylnaphthalene	µg/kg	1.70E+05	2.6E+07	<300	<300	<300	<300	<300	<300	<300
1-Methylnaphthalene	µg/kg	NC	NC	<300	<300	<300	<300	<300	<300	<300

Exceeds nonresidential drinking water protection criteria

Exceeds nonresidential direct contact criteria

CS-A-4 - Indicates sidewall confirmatory sample number 4 from Subarea A

CF-B-3 - Indicates floor confirmatory sample number 3 from Subarea B

(D) Calculated criterion exceeds 100 percent

(DD) Hazardous substances causes developmental effects

(NLL) Means hazardous substances is not likely to leach under most soil conditions

(ID) Means insufficient data to develop criterion

(NC) Means no criterion or value is available

-- Not analyzed

Statement of Basis: Table 1
Summary of 2011 Soil, Floor Block and Confirmation Sample Analytical Results
RACER Trust - Dort Highway Land
Grand Blanc, Michigan

Parameter		MDEQ Criteria		CS-B-1 (1.25')	CS-B-2 (1.0')	CS-B-3 (0.75')	CS-B-4 (0.75')	CS-B-5 (0.75')	CF-B-2 (1.5')	CF-B-3 (1.5')	CF-B-4 (1.5')
		Nonresidential Drinking Water Protection Criteria	Nonresidential Direct Contact Criteria								
Acenaphthene	µg/kg	8.8E+05	1.3E+08	800	<300	<300	<300	400	<300	<300	<300
Acenaphthylene	µg/kg	17000	5.2E+06	<300	<300	<300	<300	<300	<300	<300	<300
Anthracene	µg/kg	41000	7.3E+08	1,500	<300	300	500	1,000	<300	<300	<300
Benzo(a)anthracene	µg/kg	NLL	80000	3,000	600	800	1,700	1,900	1,000	1,000	800
Benzo(a)pyrene	µg/kg	NLL	8000	3,300	600	800	2,200	2,100	1,300	1,100	1,000
Benzo(b)fluoranthene	µg/kg	NLL	80000	5,300	1,000	1,400	3,600	3,400	2,100	1,700	1,700
Benzo(k)fluoranthene	µg/kg	NLL	8.0E+05	5,300	1,000	1,300	3,500	3,400	2,100	1,600	1,600
Benzo(ghi)perylene	µg/kg	NLL	7.0E+06	1,500	400	500	1,300	1,100	900	600	700
Chrysene	µg/kg	NLL	8.0E+06	3,100	700	800	2,000	2,100	1,100	1,100	1,000
Dibenzo(ah)anthracene	µg/kg	NLL	8000	<300	<300	<300	<300	<300	<300	<300	<300
Fluoranthene	µg/kg	7.30E+05	1.3E+08	8,100	1,300	1,800	3,500	5,100	1,900	1,900	2,000
Fluorene	µg/kg	8.9E+05	8.7E+07	700	<300	<300	<300	400	<300	<300	<300
Indeno(1,2,3-cd)pyrene	µg/kg	NLL	80000	1,500	300	500	1,200	1,000	800	600	600
Naphthalene	µg/kg	1.00E+05	5.2E+07	<300	<300	<300	<300	<300	<300	<300	<300
Phenanthrene	µg/kg	1.60E+05	5.2E+06	5,700	600	1,100	1,500	3,300	900	800	1,100
Pyrene	µg/kg	4.8E+05	8.4E+07	5,900	1,000	1,400	2,900	3,700	1,700	1,500	1,600
2-Methylnaphthalene	µg/kg	1.70E+05	2.6E+07	<300	<300	<300	<300	<300	<300	<300	<300
1-Methylnaphthalene	µg/kg	NC	NC	<300	<300	<300	<300	<300	<300	<300	<300

Exceeds nonresidential drinking water protection criteria

Exceeds nonresidential direct contact criteria

CS-A-4 - Indicates sidewall confirmatory sample number 4 from Subarea A

CF-B-3 - Indicates floor confirmatory sample number 3 from Subarea B

(D) Calculated criterion exceeds 100 percent

(DD) Hazardous substances causes developmental effects

(NLL) Means hazardous substances is not likely to leach under most soil conditions

(ID) Means insufficient data to develop criterion

(NC) Means no criterion or value is available

-- Not analyzed

Statement of Basis: Table 1
Summary of 2011 Soil, Floor Block and Confirmation Sample Analytical Results
RACER Trust - Dort Highway Land
Grand Blanc, Michigan

Parameter		MDEQ Criteria		CF-B-5 (1.5')	CF-B-6 (7.0')	CF-B-7 (1.5')	CF-B-8 (7.0')	CF-B-9 (1.5')	CF-B-10 (Reconfirmation Sample for CF-B-1) (2.5')	CF-B-11 (Reconfirmation Sample for CF-B-1) (2.5')
		Nonresidential Drinking Water Protection Criteria	Nonresidential Direct Contact Criteria							
Acenaphthene	µg/kg	8.8E+05	1.3E+08	300	700	<300	700	1,400	<300	<300
Acenaphthylene	µg/kg	17000	5.2E+06	<300	<300	<300	<300	<300	<300	<300
Anthracene	µg/kg	41000	7.3E+08	1,400	1,100	<300	<300	2,300	<300	<300
Benzo(a)anthracene	µg/kg	NLL	80000	3,200	2,300	300	500	4,500	<300	<300
Benzo(a)pyrene	µg/kg	NLL	8000	3,600	2,600	400	600	5,200	<300	<300
Benzo(b)fluoranthene	µg/kg	NLL	80000	6,100	4,400	600	900	8,600	<300	<300
Benzo(k)fluoranthene	µg/kg	NLL	8.0E+05	6,100	4,400	600	900	8,700	<300	<300
Benzo(ghi)perylene	µg/kg	NLL	7.0E+06	1,800	1,400	<300	300	2,300	<300	<300
Chrysene	µg/kg	NLL	8.0E+06	3,600	2,600	400	600	5,000	<300	<300
Dibenzo(ah)anthracene	µg/kg	NLL	8000	<300	<300	<300	<300	<300	<300	<300
Fluoranthene	µg/kg	7.30E+05	1.3E+08	8,100	5,800	800	1,000	13,000	<300	<300
Fluorene	µg/kg	8.9E+05	8.7E+07	400	700	<300	600	1,300	<300	<300
Indeno(1,2,3-cd)pyrene	µg/kg	NLL	80000	1,800	1,300	<300	<300	2,400	<300	<300
Naphthalene	µg/kg	1.00E+05	5.2E+07	<300	<300	<300	4,000	<300	<300	<300
Phenanthrene	µg/kg	1.60E+05	5.2E+06	4,700	3,600	400	900	9,500	<300	<300
Pyrene	µg/kg	4.8E+05	8.4E+07	6,000	4,600	600	800	9,200	<300	<300
2-Methylnaphthalene	µg/kg	1.70E+05	2.6E+07	<300	<300	<300	700	<300	<300	<300
1-Methylnaphthalene	µg/kg	NC	NC	<300	<300	<300	500	<300	<300	<300

Exceeds nonresidential drinking water protection criteria

Exceeds nonresidential direct contact criteria

CS-A-4 - Indicates sidewall confirmatory sample number 4 from Subarea A

CF-B-3 - Indicates floor confirmatory sample number 3 from Subarea B

(D) Calculated criterion exceeds 100 percent

(DD) Hazardous substances causes developmental effects

(NLL) Means hazardous substances is not likely to leach under most soil conditions

(ID) Means insufficient data to develop criterion

(NC) Means no criterion or value is available

-- Not analyzed

Statement of Basis: Table 1
Summary of 2011 Soil, Floor Block and Confirmation Sample Analytical Results
RACER Trust - Dort Highway Land
Grand Blanc, Michigan

Parameter		MDEQ Criteria		CS-C-1 (3.0')	CS-C-2 (3.0')	CS-C-3 (3.0')	CS-C-4 (3.0')	CS-C-5 (2.25')	CF-C-1 (5.0')	CF-C-3 (4.5')	CF-C-4 (4.5')	CF-C-5 (Reconfirmation Sample for CF-C-2) (6.0')
		Nonresidential Drinking Water Protection Criteria	Nonresidential Direct Contact Criteria									
Acenaphthene	µg/kg	8.8E+05	1.3E+08	<300	<300	<300	<300	<300	<300	1,900	<300	<300
Acenaphthylene	µg/kg	17000	5.2E+06	<300	<300	<300	<300	<300	<300	<300	<300	<300
Anthracene	µg/kg	41000	7.3E+08	<300	<300	<300	300	<300	400	4,000	<300	<300
Benzo(a)anthracene	µg/kg	NLL	80000	<300	<300	500	900	<300	900	6,200	<300	<300
Benzo(a)pyrene	µg/kg	NLL	8000	300	<300	600	1,100	<300	1,000	6,400	<300	<300
Benzo(b)fluoranthene	µg/kg	NLL	80000	500	<300	1,000	1800	400	1,600	10,300	<300	<300
Benzo(k)fluoranthene	µg/kg	NLL	8.0E+05	500	<300	1,000	1,800	400	1,600	10,600	<300	<300
Benzo(ghi)perylene	µg/kg	NLL	7.0E+06	<300	<300	400	700	<300	600	2,800	<300	<300
Chrysene	µg/kg	NLL	8.0E+06	300	<300	600	100	<300	1,100	6,300	<300	<300
Dibenzo(ah)anthracene	µg/kg	NLL	8000	<300	<300	<300	<300	<300	<300	<300	<300	<300
Fluoranthene	µg/kg	7.30E+05	1.3E+08	600	<300	1,300	2,000	600	2,200	18,500	<300	<300
Fluorene	µg/kg	8.9E+05	8.7E+07	<300	<300	<300	<300	<300	<300	1,400	<300	<300
Indeno(1,2,3-cd)pyrene	µg/kg	NLL	80000	<300	<300	400	700	<300	500	2,900	<300	<300
Naphthalene	µg/kg	1.00E+05	5.2E+07	<300	<300	<300	<300	<300	<300	<300	<300	<300
Phenanthrene	µg/kg	1.60E+05	5.2E+06	400	<300	600	1,100	<300	1,400	14,600	<300	<300
Pyrene	µg/kg	4.8E+05	8.4E+07	500	<300	1,000	1,600	400	1,700	21,800	<300	<300
2-Methylnaphthalene	µg/kg	1.70E+05	2.6E+07	<300	<300	<300	<300	<300	<300	<300	<300	<300
1-Methylnaphthalene	µg/kg	NC	NC	<300	<300	<300	<300	<300	<300	<300	<300	<300

Exceeds nonresidential drinking water protection criteria

Exceeds nonresidential direct contact criteria

CS-A-4 - Indicates sidewall confirmatory sample number 4 from Subarea A

CF-B-3 - Indicates floor confirmatory sample number 3 from Subarea B

(D) Calculated criterion exceeds 100 percent

(DD) Hazardous substances causes developmental effects

(NLL) Means hazardous substances is not likely to leach under most soil conditions

(ID) Means insufficient data to develop criterion

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-- Not analyzed

Attachment 1: Index to the Administrative Record

RACER Trust: Empowering America's Auto Communities

Commercial and Industrial Properties That Are Primed for Sale and Development

Environmental Cleanup
Economic Development
Properties/Sales
- Map View
- Searchable Database
- Buyer's Guide
- Sales Criteria
- Confidentiality Agreement
- Letter of Intent
- Purchase & Sale Agreement
- Licensing RACER Properties
- License Agreement
- Environmental Easement Agreement
- International Brochure
- Government Proposals to Acquire Properties
- How We're Cleaning Up
- How We're Revitalizing

Property Details

Facility ID:	12960
Facility Name:	Dort Highway Industrial Land
Address:	6515 S. Dort Highway
City:	Grand Blanc
State:	MI
Zip:	
County:	Genesee
Zoning:	
Land Size (Acres):	20.44
Latitude:	42.932359
Longitude:	-83.649259
Cleanup Manager:	Dave Favero, Grant Trigger

Associated Files

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Table 3-SPLP Results.xls	download

Attachment 2: Ecological Habitat

Ecological Habitat Characterization for the Dort Highway Land Site in Grand Blanc, Michigan

The purpose of this technical memorandum is to summarize results of the data review and site evaluation to identify potential ecological habitats requiring further evaluation at the Dort Highway Land Site (the "Site"). The initial steps in the risk assessment process involve: conducting a preliminary review of available site-specific data and a site visit, evaluate the nature and extent of contamination, characterize potential ecological receptors, and identify potential pathways of exposure.

The Site is located in Grand Blanc Township, Genesee County, Michigan. The Site is located in an industrial and commercial area of Grand Blanc. The current address for the Site, 10800 S. Saginaw Street, is also associated with the adjacent General Motors LLC (GM) plant. The Site is comprised of 20.44 acres of vacant land that was formerly part of the adjacent active GM facility. It is currently unused and vacant with a fence surrounding the property, separating it from the adjacent GM facility.

The 20 acre Site is zoned industrial and is a small portion of the otherwise industrial 210-acre GM complex. The surrounding land is also zoned industrial or commercial, with a low potential for ecological habitat sufficient to support most wildlife.

The surface of the Site has been highly altered by the stripping/removal of an average of approximately 4 feet of soils and fill materials during the demolition of the former Press Room located at the adjacent GM facility. The stripped material was used to fill in the former Press Room basement. The soil removal activities were completed in 2009 on the Site; however, the Site was not stabilized until 2012. In 2011 GM installed an approximate 1 to 4 foot high berm along the southern boundary of the Site to separate the GM and Site properties, and installed a new perimeter fence along the southern and eastern boundaries of the Site. Two soil erosion control drainage structures were installed in 2011 in the southwestern portion of the Site to allow discharge of Site storm water to the drainage ditch west of the Site along Dort Highway. In December 2011 through January 2012 additional remediation activities were completed to remove polynuclear aromatic hydrocarbon (PAH) constituent impacted buried wood floor blocks and some associated soil. The Site was stabilized by installation of the soil erosion control drainage structures, re-grading, and seeding, which provided for establishment of a grass vegetative cover.

The current topography of the Site is generally characterized by a gentle northeast to southwest slope along the southern and north central portions of the Site, a gentle northwest slope along the

eastern portion of the Site, and a gentle north to south slope along the very western portion of the Site. No wetlands or other waters of the United States occur on the Site. The ditch west of the Site discharges to a drainage ditch that flows to the west below Dort Highway and eventually discharges to Gibson Drain located approximately 1,300 ft southwest of the Site. Gibson Drain is the closest surface water body to the Site.

Gibson Drain is not a natural water body, but a man-made drainage ditch, classified as a canal by the USGS. Gibson Drain was installed to drain the former agricultural fields that once existed in the Site area. The closest natural water body to the Site is Thread Creek located approximately two thirds of a mile northeast of the Site. However, as explained above, surface drainage from the Site drains to the west toward Gibson Drain, not towards Thread Creek. The drainage divide for surface drainage toward Thread Creek is just east of the Site on the GM facility. In addition, shallow (<20 feet below grade [fbg]), apparently perched and not interconnected groundwater also flows toward the west and southwest at the Site. Based on topography and on-Site groundwater potentiometric surface contours, any groundwater flowing off-site to the west or southwest could eventually discharge to Gibson Drain. However, deeper regional groundwater flow is reported to be at depths of 50 to 70 fbg in the Site area and flows towards the northwest (University of Michigan – Flint, 1994).

Gibson Drain transitions to piped flow beneath a development about a mile northwest of the Site and just south and about a quarter mile north of Hill Road, before transitioning back to an open ditch approximately a third of a mile further north of Hill Road and the Site.

Conclusion

Based on the above information, the Site does not provide suitable, unique or specialized habitat for wildlife or plant species, and no wetlands or streams are present. Further, the Site and Site area do not contain habitat suitable for listed rare or endangered floral and/or fauna species.

EPA has determined that no further evaluation of risks to ecological receptors at the Site is warranted.

References

University of Michigan – Flint, 1994. Groundwater Resources Map Series, Grand Blanc Township, Genesee County, Michigan. Regional Groundwater Center. November.

Attachment C – Declaration of Restrictive Covenant

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John J. Gleason T20150017896
Genesee County Register MAIL

DECLARATION OF RESTRICTIVE COVENANT

MDEQ Reference Number: RC-WHMD-111-14-010
Facility MID Number: MID 005 356 944

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

This Restrictive Covenant is made on March 17, 2015, by RACER Properties LLC, the Grantor, whose address is 500 Woodward Street, Suite 1510, Detroit, Michigan 48226, and an entity wholly owned by the Revitalizing Auto Communities Environmental Response Trust (Trust) and the current fee title holder of the Property, for the benefit of the Grantee, State of Michigan, Department of Environment Quality (MDEQ), whose address is 525 West Allegan Street, P.O. Box 30473, Lansing, MI 48909-7926.

This Restrictive Covenant has been made to prohibit or restrict activities that could result in unacceptable exposure to environmental contamination present at the Property with the address of 6431 South Dort Highway, Grand Blanc, Genesee County, MI 48439; Tax Identification Number: 12-09-300-006, legally described in Exhibit 1 and depicted in Exhibit 2 (Property or Site). Recording of this Restrictive Covenant is designed to restrict exposures to groundwater on the Property, and require any future work, or other activities on the Property by or for the Owner, to be conducted in conformance with; i) applicable MDEQ soil relocation requirements including but not limited to MCL 324.20120c and any related administrative rules and MDEQ guidance; and ii) applicable due care obligations under MCL 324.20107a and associated administrative rules and guidance, as well as the Hazardous Waste Operations and Emergency Response Standard (HAZWOPER), 29 C.F.R. Part 1910.

The land and resource use restrictions contained in this Restrictive Covenant are based upon information available to United States Environmental Protection Agency (USEPA) at the time this document was recorded. Future changes in the environmental condition of the Property or changes in the cleanup criteria developed under Parts 111 and 201 of NREPA; the discovery of

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environmental conditions at the Property that were not known at the time this document was recorded; or use of the Property in a manner inconsistent with the restrictions described herein – each may result in this Restrictive Covenant not being protective of public health, safety, and welfare, and the environment. Additional restrictions may become necessary. Information pertaining to environmental conditions of the Property and Response Activities undertaken at the Property is on file with the United States Environmental Protection Agency Region 5, Land and Chemicals Division (USEPA).

Based on the results of site investigations, the Property contains hazardous substances in excess of the concentrations developed as the unrestricted residential criteria under Section 20120a(1)(a) or (17) of NREPA, 1994 PA 451, as amended. Exhibit 3 is a list of hazardous constituents above criteria in soil or groundwater at the Property and their associated criteria. MDEQ and USEPA recommend that prospective purchasers or users of the Property undertake appropriate due diligence prior to acquiring or using this Property, and undertake appropriate actions to comply with the requirements of Section 20107a of NREPA.

Summary of Corrective Measures

General Motors Corporation (GMC) performed investigations of the Property beginning in August 2005. In 2009, GMC stripped and removed the approximately upper four feet of soils and fill materials from the Property during the demolition of the former Press Room (which is on the adjacent plant property now owned by GMC's successor General Motors LLC), which resulted in the removal of approximately 130,000 cubic yards (CY) of material from the Property. This material was used to fill the Press Room basement. GMC removed these materials in accordance with the applicable MDEQ soil relocation requirements, including but not limited to MCL 324.20120c, such that any impacts in the relocated soils were moved to a similarly impacted area (i.e., the former Press Room). However, prior to the removal activities, GMC removed and disposed of at an appropriate off-site disposal facility an area approximately 40 feet by 40 feet to a depth of about 1.5 feet that was impacted by mercury, because such impacts were considered dissimilar to other potential impacts in the former Press Room area.

On March 31, 2011, the Trust took title to the Property, and subsequently conveyed it to RACER Properties LLC, an entity wholly owned by the Trust. The Trust was established and assumed the rights, title, and interest of Motors Liquidation Company (as successor to GMC) in and to the Property pursuant to an Environmental Response Trust Consent Decree and Settlement Agreement (Settlement Agreement) entered by the U.S. Bankruptcy Court for the Southern District of New York on March 29, 2011, in the case of *In re Motors Liquidation Company*, etc. et al., Debtors, Case No. 09-50026 (REG), among the Debtors, the United States of America, certain states including the State of Michigan, the Saint Regis Mohawk Tribe, and EPLET, LLC, (not individually but solely in its representative capacity as Administrative Trustee of the Trust).

The Trust entered into a Performance Based Corrective Action Agreement (Agreement) with USEPA for the Property effective September 29, 2011.

In 2011, pursuant to the Agreement, the Trust submitted to USEPA the Current Conditions Report and Floor Block Area Investigation Report. In November 2011, USEPA approved the

Sampling and Analysis Plan and Quality Control Document and the implementation of an Interim Remedial Measure (IRM) to address impacts associated with buried wood floor blocks within an approximately two-acre area along the southern portion of the Property. The Trust performed and completed the IRM between December 2011 and March 2012, including the removal of approximately 3,105 tons of impacted soil and floor blocks. Completion of the IRM is documented in the Corrective Measures Study (CMS) Report (O'Brien & Gere, 2013).

At the request of USEPA, the Trust performed a groundwater investigation between May 2012 and April 2013. The groundwater investigation included the installation and sampling of nine groundwater monitoring wells in addition to sampling an existing monitoring well.

The Trust's investigations identified above detected constituents in soil and groundwater above Residential, Groundwater Surface Water Interface (GSI), and Non-Residential default cleanup criteria. The investigations and results are described in the CMS Report, Environmental Indicator (EI) Report – Determination for Current Human Exposures (CA725), and EI Report – Migration of Contaminated Groundwater Under Control (CA750), which the Trust submitted to USEPA. USEPA approved the EI CA725 in October 2012, and the EI CA750 and CMS Report in September 2013. As this Restrictive Covenant will prohibit residential uses of the Property and prohibit most groundwater uses at the Property, constituents that only exceed Residential default criteria are not listed in the following paragraph.

The soil sampling results indicate no exceedances of MDEQ drinking water protection or direct contact criteria in the soil currently remaining at the Site. Constituents that exceed GSI protection default criteria in soil are mercury, polynuclear aromatic hydrocarbons (PAHs), and selenium; however, mercury, PAHs and selenium were not detected in groundwater during the Groundwater Investigation conducted in 2012 and 2013; therefore, they are not considered constituents of concern (COCs) for the Site. Constituents that exceed GSI or Non-Residential default criteria in groundwater are arsenic, lead, selenium, and silver. However, selenium and silver are not considered COCs for the Site because selenium was not detected during the Groundwater Investigation; and silver was only detected historically in MW2-2 and once in MW-9 above the GSI criterion, has not been detected above the drinking water or the GSI criteria in the downgradient monitoring wells, and is not migrating off-site. Based on the available information, the horizontal and vertical extent of the three dimensional volume of groundwater impacts at the Property appear to be stable or decreasing in size.

As of the date of this Restrictive Covenant, Grantor continues to perform activities in keeping with its goal to obtain from USEPA a formal RCRA "Corrective Action Complete with Controls" determination for the Property.

Definitions

"Agreement" shall mean the September 29, 2011, Performance Based Corrective Action Agreement between the Trust and USEPA.

"Grantee" shall mean MDEQ, its respective successor entities, and those persons or entities acting on its behalf.

"Grantor" shall mean RACER Properties LLC, an entity wholly-owned by the Trust, the title holder of the Property at the time this Restrictive Covenant was executed, or any future title holder of the Property or some relevant sub-portion of the Property.

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

"NREPA" shall mean the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended, MCL 324.101 *et seq*.

"Owner" means at any given time the then current fee title holder(s) and the holder(s) of a life estate of the Property or any portion thereof, including the fee title holder's lessees and those persons or entities authorized to act on its behalf.

"Part 111" shall mean Part 111, Hazardous Waste Management, of the NREPA.

"Part 201" shall mean Part 201, Environmental Remediation, of the NREPA.

"Property" shall mean the property the legal description of which is set forth in Exhibit 1, and as depicted in Exhibit 2, Survey of Property.

"Site" shall have the same meaning as "Property."

"USEPA" shall mean the United States Environmental Protection Agency, its successor entities, and those persons or entities acting on its behalf.

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

NOW THEREFORE,

Declaration of Land Use or Resource Use Restrictions

Grantor as current fee title holder of the Property, hereby declares and covenants that the Property, shall be subject to those restrictions on use described below, and intends that said restrictions and covenants shall run with the land, and may be enforced in perpetuity against the Owner by the following entities: (1) Grantor, if it is no longer Owner; (2) MDEQ; and (3) USEPA.

1. Land Use Prohibitions. The Owner shall prohibit all uses of the Property that are not compatible with or are inconsistent with the assumptions for the nonresidential cleanup criteria established pursuant to Section 324.20120a(1)(b) of NREPA. Uses that are

compatible with nonresidential cleanup criteria are generally described in Exhibit 4 (Description of Allowable Uses).

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

2. Activities Prohibited. Owner shall prohibit activities on the Property that may result in exposures to hazardous substances above the nonresidential cleanup criteria. These prohibited activities include:

   a. No drinking water wells may be installed or used on the Property.

   b. No groundwater extraction wells may be installed or used on the Property, except for wells and devices that are part of an MDEQ- or USEPA-approved response activity, and for short-term dewatering for construction purposes, provided the dewatering, including management and disposal of the groundwater, is conducted in accordance with all applicable environmental laws and does not cause or result in a new release, exacerbation of any pre-existing environmental condition, or any other violation of environmental laws.

   c. No contaminated soils may be relocated on the Property except as provided for under Part 201, Section 20120c, MCL 324.20120c.

   d. Owner shall not "treat", "store", "dispose", or release any Hazardous Substances, on, at, or below the Property, in a manner that would require a permit under RCRA, 42 U.S.C. §§ 6901 *et seq.* or Part 111, except pursuant to a plan, permit, or license approved in writing by MDEQ or USEPA, pursuant to these statutory authorities.

   e. If Owner elects to remove any slabs, pavement or other impervious surface on the Property, Owner shall be responsible for any and all obligations under environmental laws arising from any such removal, alteration or disturbance, whether or not caused by, arising from or related to, an environmental condition.

3. Monitoring Wells. The Owner shall not remove, disturb, or damage any monitoring wells on the Property without MDEQ or USEPA approval.

4. Contaminated Soil Management. The Owner shall manage contaminated soils, media and/or debris and all other soils located on the Property in accordance with the requirements of Part 111 and RCRA Subtitle C, the administrative rules promulgated pursuant to Part 111 and RCRA, and all other relevant state and federal laws, including but not limited to MCL 324.20120c; this provision regarding contaminated soil

management also applies in the event that the Owner elects to remove any slabs, pavement, or other impervious surface on the Property.

5. Access. The Owner shall grant to MDEQ and USEPA the right to enter the Property at reasonable times for the purpose of determining and monitoring compliance with this Restrictive Covenant, including the right to take samples, inspect the operation of corrective measures, and inspect any records relating thereto, and to perform any actions necessary to maintain compliance with Parts 111 and 201, applicable federal laws and regulations, and the USEPA Final Decision, and the subsequent CACC Report.

6. Transfer of Interest. The Grantor shall provide notice to USEPA and MDEQ at the addresses provided in Paragraph 7 of the Grantor's intent to transfer any interest in the Property, or any portion thereof, at least fourteen (14) business days prior to consummating the conveyance. A conveyance of title, easement, or other interest in the Property shall not be consummated by Grantor without adequate and complete provision for compliance with the terms and conditions of this Restrictive Covenant and the applicable provisions of Section 20116 of the NREPA. Grantor shall include in any instrument conveying any interest in any portion of the Property, including, but not limited to, deeds, leases, and mortgages, a notice which is in substantially the following form:

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

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

7. Notices. Any notice, demand, request, consent, approval, or communication that is required to be made or obtained under this Restrictive Covenant shall be made in writing; include a statement that the notice is being made pursuant to the requirements of this Restrictive Covenant; include the Facility MID Number: MID 005 356 944 and MDEQ Reference Number: RC-WHMD-111-14-010; and shall be served either personally, or sent via first class mail, postage prepaid, as follows:

For USEPA:

Director
Land and Chemicals Division (DR-8J)
U.S. Environmental Protection Agency, Region 5
77 West Jackson Blvd.
Chicago, IL 60604

with a copy to:

Office of Regional Counsel (C-14J)
U.S. Environmental Protection Agency, Region 5
77 West Jackson Blvd.
Chicago, IL 60604

For MDEQ:

Chief
Office of Waste Management and Radiological Protection
Michigan Department of Environmental Quality
P.O. Box 30241
Lansing, MI 48909-7741

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

9. Enforcement. Grantor is entitled to enforce the restrictions and covenants of this Restrictive Covenant by specific performance or other legal action in a court of competent jurisdiction against subsequent Owners of all or part of the Property. Grantor, on behalf of itself, and its successors in title, intends and agrees that MDEQ and USEPA are entitled to enforce the restrictions and covenants in this Restrictive Covenant by specific performance or other legal action in a court of competent jurisdiction against Grantor, as Owner, and thereafter against subsequent Owners of all or part of the Property. All remedies available hereunder shall be in addition to any and all other remedies at law or equity.

10. Third Party Beneficiary. Grantor, on behalf of itself and its successors, and assigns, hereby agrees that the United States, acting by and through USEPA, its successors and assigns shall be a third party beneficiary (Third Party Beneficiary) of all the benefits and rights set out in the restrictions, covenants, easements, exceptions, notifications, conditions and agreements herein, and that the Third Party Beneficiary shall have the right to enforce the restrictions described herein as if it was a party hereto. No other rights in third parties are intended by this Restrictive Covenant, and no other person or entity shall have any rights or authorities hereunder to enforce these restrictions, terms, conditions or obligations beyond Grantor, MDEQ, their successors, assigns, and the Third Party Beneficiary.

11. USEPA Entry and Access. Nothing in this Restrictive Covenant shall limit or otherwise affect USEPA's right of entry and access, or authority to undertake actions under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA, 42 U.S.C. §§ 9601 *et seq.*) or under the National Contingency Plan (40 C.F.R. Part 300),

and any successor statutory provisions, or other state or federal law. Grantor consents to officers, employees, contractors, and authorized representatives of USEPA entering and having continued access to this Property for the purposes described in Paragraph 5 (Access) of this Restrictive Covenant.

12. Modification/ Release/Rescission. Grantor or Owner may request in writing to MDEQ or USEPA, at the addresses provided in herein, modifications to, or release or rescission of, this Restrictive Covenant. This Restrictive Covenant may be modified, released or rescinded only with the written approval of MDEQ or USEPA. Any approved modification to, or release or rescission of, this Restrictive Covenant shall be filed with the appropriate Registrar of Deeds by the Grantor or Owner and a certified copy shall be returned to MDEQ and USEPA at the addresses provided herein.

13. Severability. If any provision of this Restrictive Covenant is held to be invalid by a court of competent jurisdiction, the invalidity of such provision shall not affect the validity of any other provisions of this Restrictive Covenant and all other provisions shall continue to remain in full force and effect.

14. Limitation on Liability. The Trust's, RACER Properties LLC's and the Administrative Trustee's liability under this Restrictive Covenant is limited by the terms and conditions of the Settlement Agreement, which are incorporated herein by reference.

15. Authority to Execute Restrictive Covenant. The undersigned person executing this Restrictive Covenant represents and certifies that he or she is duly authorized and has been empowered to execute and deliver this Restrictive Covenant.

16. Compliance with this Restrictive Covenant and Applicable Due Care Obligations. The Owner shall at all times comply with the conditions and restrictions of this Declaration of Restrictive Covenant and the applicable Due Care obligations under Section 107a of NREPA, MCLA 324.20107a, under the applicable Michigan administrative rules R299.51003, and under CERCLA, 42 U.S.C. § 9601, *et seq*. Owner agrees to maintain records of its activities to comply with this Declaration of Restrictive Covenant and applicable Due Care obligations, and shall timely supply copies of any records documenting such compliance upon request from RACER, MDEQ or USEPA.

17. Miscellaneous.

    a) Controlling Law. The interpretation and performance of this Restrictive Covenant shall be governed by the laws of the United States as to the obligations referred to in the Agreement and regulations of the State of Michigan for all other purposes hereunder (without reference to choice of laws principles thereof). The right to enforce the conditions and restrictions in this Restrictive Covenant are in addition to other rights and remedies that may be available, including, but not limited to, administrative and judicial remedies under CERCLA or Part 201 of the NREPA.

b) Liberal Construction. Any general rule of construction to the contrary notwithstanding, this Restrictive Covenant shall be liberally construed to affect the purpose of this Restrictive Covenant, and the policy and purpose of RCRA and the land use restrictions and prospective use limitations required by Part 201. If any provision of this Restrictive Covenant is found to be ambiguous, an interpretation consistent with the purpose of this Restrictive Covenant that would render the provision valid shall be favored over any interpretation that would render it invalid.

c) Entire Agreement. This Restrictive Covenant and its attachments and appendices supersedes all prior discussions, negotiations, understandings, or agreements relating to the matters addressed herein, all of which are merged herein.

[signature page follows]

IN WITNESS WHEREOF, RACER Properties LLC has caused this Restrictive Covenant, RC-WHMD-111-14-010, to be executed on this 17 day of March, 2015.

RACER PROPERTIES LLC

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

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

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

****

STATE OF Michigan
COUNTY OF Wayne

The foregoing instrument was acknowledged before me this 17th day of March, 2015, by ELLIOTT P. LAWS, as Managing Member of EPLET, LLC, acting solely in its representative capacity as Administrative Trustee of Revitalizing Auto Communities Environmental Response Trust as Sole Member of RACER Properties LLC, a Delaware limited liability company, on behalf of the company.

_____
Notary Public Signature

TRACIE L. NICHOLS
Notary Public, State of Michigan
County of Oakland
My Commission Expires 03-19-2017
Acting in the County of Wayne

Name of Notary Public Tracie L. Nichols
Notary Public, State of Michigan
County of Oakland
My Commission Expires: 3/19/17
Acting in the County of Wayne

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

Prepared by/Return to:
Carl Garvey, General Counsel
RACER Trust
500 Woodward Avenue, Suite 1510
Detroit, MI 48226

> MAIL $56

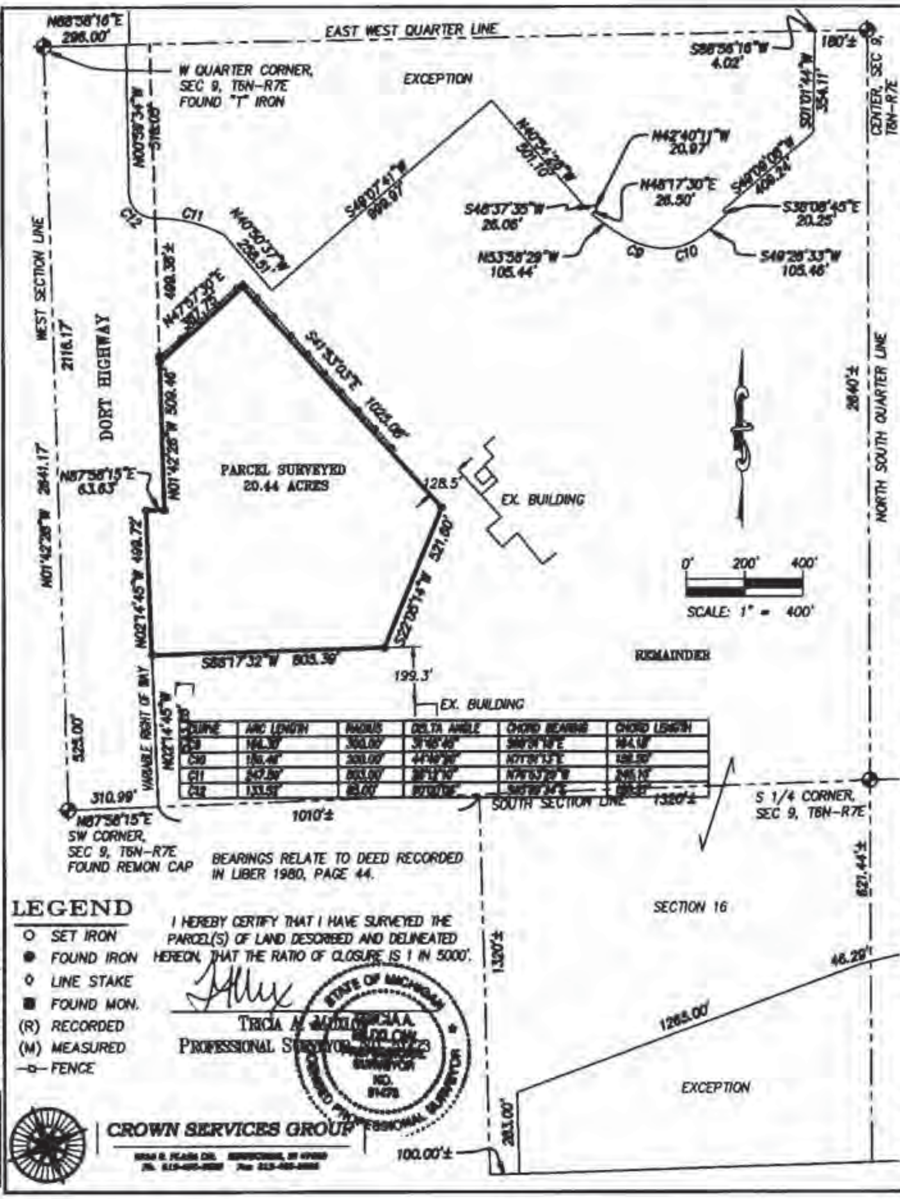
EXHIBIT 1
LEGAL DECRIPTION OF PROPERTY

PART OF THE SOUTHWEST QUARTER OF SECTION 9, TOWN 6 NORTH, RANGE 7 EAST, GRAND BLANC TOWNSHIP, GENESEE COUNTY, MICHIGAN; THENCE N 87 DEG 58 MIN 15 SEC E 310.99 FEET; THENCE N 02 DEG 14 MIN 45 SEC 2 W 523.28 FEET TO THE POINT OF BEGINNING; THENCE N 02 DEG 14 MIN SEC W 499.72 FEET; THENCE N 87 DEG 58 MIN 15 SEC E 63.63 FEET; THENCE N 01 DEG 42 MIN 28 SEC W 509.46 FEET; THENCE N 47 DEG 57 MIN 30 SEC E 387.75 FEET; THENCE S 41 DEG 53 MIN 03 SEC E 1025.08 FEET; THENCE S 22 DEG 05 MIN 14 SEC W 521.60 FEET; THENCE S 88 DEG 17 MIN 32 SEC W 805.39 FEET TO THE POINT OF BEGINNING. CONTAINING 20.44 ACRES.

Tax Identification Number: 12-09-300-006

EXHIBIT 2
SURVEY OF PROPERTY

[The survey drawing follows]



LEGAL DESCRIPTION OF PARCEL SURVEYED:
PART OF THE SOUTHWEST QUARTER OF SECTION 9, TOWN 6 NORTH, RANGE 7 EAST, GRAND BLANC TOWNSHIP, GENESEE COUNTY, MICHIGAN; THENCE N87°58'15"E 310.99 FEET; THENCE N02°14'45"W 523.28 FEET TO THE POINT OF BEGINNING; THENCE N02°14'45"W 499.72 FEET; THENCE N87°58'15"E 63.63 FEET; THENCE N01°42'28"W 509.46 FEET; THENCE N47°57'30"E 387.75 FEET; THENCE S41°53'03"E 1025.08 FEET; THENCE S22°05'14"W 521.60 FEET; THENCE S88°17'32"W 805.39 FEET TO THE POINT OF BEGINNING. CONTAINING 20.44 ACRES.

LEGAL DESCRIPTION OF REMAINDER:
ALL THAT PART OF THE SOUTHWEST 1/4 OF SECTION 9, TOWN 6 NORTH, RANGE 7 EAST, GRAND BLANC TOWNSHIP, GENESEE COUNTY, MICHIGAN, LYING EASTERLY OF THE EAST RIGHT OF WAY LINE OF DORT HIGHWAY AND DORT HIGHWAY. EXCEPTING THEREFROM THE FOLLOWING PREMISES CONVEYED BY COVENANT DEED RECORDED IN INSTRUMENT NO. 200512600009155, DESCRIBED AS: PART OF SECTION 9, TOWN 6 NORTH, RANGE 7 EAST, TOWNSHIP OF GRAND BLANC, GENESEE COUNTY, MICHIGAN, DESCRIBED AS FOLLOWS: BEGINNING AT A POINT ON THE EAST AND WEST 1/4 LINE, WHICH IS NORTH 88 DEGREES 58 MINUTES 16 SECONDS EAST, 296.00 FEET FROM THE WEST 1/4 CORNER OF SAID SECTION 9; THENCE NORTH 00 DEGREES 59 MINUTES 34 SECONDS WEST ALONG THE EAST RIGHT-OF-WAY LINE OF DORT HIGHWAY EXTENSION, 627.13 FEET TO THE SOUTHEASTERLY LINE OF CONSUMERS ENERGY COMPANY PROPERTY; THENCE NORTHEASTERLY ALONG SAID SOUTHEASTERLY LINE, NORTH 24 DEGREES 45 MINUTES 07 SECONDS EAST, 243.89 FEET AND NORTH 49 DEGREES 11 MINUTES 44 SECONDS EAST, 1186.67 FEET TO THE SOUTHWESTERLY LINE OF SAGINAW ROAD; THENCE SOUTH 40 DEGREES 55 MINUTES 25 SECONDS EAST ALONG SAID SOUTHWESTERLY LINE, 2093.21 FEET; THENCE SOUTH 88 DEGREES 56 MINUTES 16 SECONDS WEST, 4.02 FEET; THENCE SOUTH 01 DEGREES 01 MINUTES 44 SECONDS WEST, 354.11; THENCE SOUTH 49 DEGREES 09 MINUTES 08 SECONDS WEST 409.24 FEET; THENCE SOUTH 38 DEGREES 08 MINUTES 45 SECONDS EAST, 20.25 FEET; THENCE SOUTH 49 DEGREES 26 MINUTES 33 SECONDS WEST, 105.46 FEET; THENCE ON A CURVE TO THE RIGHT, HAVING A RADIUS OF 200.00 FEET, WITH A CHORD BEARING AND DISTANCE OF SOUTH 71 DEGREES 51 MINUTES 13 SECONDS WEST, 152.50 FEET; THENCE ON A CURVE TO THE RIGHT, HAVING A RADIUS OF 300.00 FEET, WITH A CHORD BEARING AND DISTANCE OF NORTH 69 DEGREES 51 MINUTES 18 SECONDS WEST, 164.18 FEET; THENCE NORTH 53 DEGREES 58 MINUTES 29 SECONDS WEST 105.44 FEET THENCE NORTH 48 DEGREES 17 MINUTES 30 SECONDS EAST, 26.50 FEET; THENCE NORTH 42 DEGREES 40 MINUTES 11 SECONDS WEST, 20.97 FEET; THENCE SOUTH 48 DEGREES 37 MINUTES 35 SECONDS WEST, 26.06 FEET; THENCE NORTH 40 DEGREES 54 MINUTES 28 SECONDS WEST 501.10 FEET; THENCE SOUTH 49 DEGREES 07 MINUTES 41 SECONDS WEST, 999.97 FEET; THENCE NORTH 40 DEGREES 50 MINUTES 37 SECONDS WEST, 258.51 FEET; THENCE ON A CURVE TO THE LEFT, HAVING A RADIUS OF 503.00 FEET WITH A CHORD BEARING AND DISTANCE OF NORTH 76 DEGREES 53 MINUTES 29 SECONDS WEST, 245.10 FEET; THENCE ON A CURVE TO THE RIGHT, HAVING A RADIUS OF 85.00 FEET, WITH A CHORD BEARING AND DISTANCE OF NORTH 45 DEGREES 59 MINUTES 34 SECONDS WEST, 120.21 FEET TO SAID EAST RIGHT OF WAY LINE OF DART HIGHWAY EXTENSION; THENCE NORTH 00 DEGREES 59 MINUTES 34 SECONDS WEST, ALONG SAID EAST LINE, 518.05 FEET TO THE PLACE OF BEGINNING.

TOGETHER WITH A NON-EXCLUSIVE TEMPORARY ACCESS ROADWAY EASEMENT FOR THE PURPOSE OF PERMITTING THE PASSAGE OF MOTOR VEHICLES AND PEDESTRIANS TO AND FROM DORT HIGHWAY, EVIDENCED OF RECORD BY ACCESS EASEMENT AGREEMENT (RACEWAY) RECORDED IN INSTRUMENT NO. 200407220078701, GENESEE COUNTY RECORDS.

ALL THAT PART OF THE NORTHEAST 1/4 OF THE NORTHWEST 1/4 OF SECTION 16 LYING NORTHERLY OF A LINE DESCRIBED AS: BEGINNING NORTH 89 DEGREES 41 MINUTES EAST, 100 FEET AND NORTH 00 DEGREES 05 MINUTES 20 SECONDS WEST 283.48 FEET FROM THE SOUTHWEST CORNER OF THE NORTHEAST 1/4 OF THE NORTHWEST 1/4; THENCE NORTH 70 DEGREES EAST TO THE NORTH-SOUTH 1/4 LINE OF SAID SECTION 16 AND THE POINT OF ENDING.

EXCEPTING THEREFROM THE FOLLOWING DESCRIBED PREMISES CONVEYED BY DEED RECORDED IN THE DEED LIBER 1331, PAGE 505 TO THE CHESAPEAKE AND OHIO RAILWAY COMPANY, DESCRIBED AS: PART OF SECTION 16, TOWN 6 NORTH, RANGE 7 EAST AND LOT 189 OF ASSESSOR'S PLAT NO. 3, CITY OF GRAND BLANC, TOWN 6 NORTH, RANGE 7 EAST, CITY OF GRAND BLANC AND TOWNSHIP OF GRAND BLANC, GENESEE COUNTY, MICHIGAN, DESCRIBED AS: BEGINNING AT A POINT ON THE EAST 1/8TH LINE OF SAID SECTION 16, WHICH IS NORTH 89 DEGREES 44 MINUTES EAST ALONG THE NORTH LINE OF SAID SECTION 16, 1331.59 FEET AND SOUTH 00 DEGREES 07 MINUTES 30 SECONDS WEST, 281.92 FEET FROM THE NORTH 1/4 POST OF SAID SECTION; THENCE SOUTH 77 DEGREES 33 MINUTES EAST, 218.76 FEET; THENCE 433.07 FEET ON A CURVE TO THE RI GHT, HAVING A RADIUS OF 683.87 FEET AND A CHORD BEARING AND DISTANCE OF SOUTH 59 DEGREES 24 MINUTES 30 SECONDS EAST, 425.87 FEET; THENCE NORTH 77 DEGREES 01 MINUTE EAST, 39.95 FEET, TO THE CHESAPEAKE AND OHIO RAILWAY COMPANY'S WESTERLY RIGHT-OF-WAY LINE; THENCE SOUTH 06 DEGREES 51 MINUTES EAST ALONG SAID WESTERLY RIGHT-OF-WAY LINE, 396.75 FEET; THENCE SOUTH 78 DEGREES 04 MINUTES WEST, 147.27 FEET; THENCE NORTH 10 DEGREES 54 MINUTES WEST, 56.65 FEET; THENCE SOUTH 78 DEGREES 58 MINUTES WEST, 100.55 FEET; THENCE NORTH 12 DEGREES 59 MINUTES WEST, 54.00 FEET; THENCE SOUTH 77 DEGREES 01 MINUTE WEST 138.00 FEET, THENCE SOUTH 12 DEGREES 59 MINUTES EAST, 44.00 FEET; THENCE SOUTH 77 DEGREES 01 MINUTE WEST, 283.62 FEET; THENCE SOUTH 00 DEGREES 07 MINUTES 30 SECONDS WEST, 296.52 FEET TO THE CENTER LINE OF REID ROAD; THENCE SOUTH 89 DEGREES 11 MINUTES WEST ALONG THE CENTER LINE OF REID ROAD, 1332.60 FEET; THENCE SOUTH 89 DEGREES 41 MINUTES WEST A LONG SAID CENTER LINE OF REID ROAD, 1238.75 FEET; THENCE NORTH 00 DEGREES 12 MINUTES EAST 283.00 FEET; THENCE NORTH 71 DEGREES 00 MINUTES EAST, 1265.00 FEET; THENCE NORTH 78 DEGREES 43 MINUTES EAST, 1403.49 FEET; THENCE NORTH 00 DEGREES 07 MINUTES 30 SECONDS EAST, 79.88 FEET TO THE PLACE OF BEGINNING. ALSO EXCEPTING THEREFROM THE FOLLOWING PREMISES CONVEYED BY SPECIAL WARRANTY DEED RECORDED IN MASTER LIBER 3402, PAGE 83, DESCRIBED AS: PART OF THE NORTHWEST 1/4 OF SECTION 16, TOWNSHIP 6 NORTH, RANGE 7 EAST, TOWNSHIP OF GRAND BLANC, GENESEE COUNTY, MICHIGAN, DESCRIBED AS: COMMENCING AT THE NORTHWEST CORNER OF SAID SECTION 16; THENCE SOUTH 89 DEGREES 57 MINUTES 10 SECONDS EAST ALONG THE NORTH LINE OF SAID SECTION 16, A DISTANCE OF 1334.40 FEET; THENCE SOUTH 00 DEGREES 05 MINUTES 20 SECONDS WEST 545.44 FEET TO THE POINT OF BEGINNING; THENCE SOUTH 48 DEGREES 47 MINUTES 10 SECONDS EAST 568.31 FEET; THENCE SOUTH 70 DEGREES 51 MINUTES 41 SECONDS WEST 347.48 FEET: THENCE SOUTH 00 DEGREES 05 MINUTES 20 SECONDS WEST 283.48 FEET TO THE CENTERLINE OF REID ROAD; THENCE SOUTH 89 DEGREES 41 MINUTES 00 SECONDS WEST ALONG SAID CENTERLINE 100.00 FEET; THENCE NORTH 00 DEGREES 05 MINUTES 20 SECONDS EAST 772.40 FEET TO THE POINT OF BEGINNING.

ALSO EXCEPTING PART OF THE SOUTHWEST QUARTER OF SECTION 9, TOWN 6 NORTH, RANGE 7 EAST, GRAND BLANC TOWNSHIP, GENESEE COUNTY, MICHIGAN; THENCE N87°58'15"E 310.99 FEET; THENCE N02°14'45"W 523.28 FEET TO THE POINT OF BEGINNING; THENCE N02°14'45"W 499.72 FEET; THENCE N87°58'15"E 63.63 FEET; THENCE N01°42'28"W 509.46 FEET; THENCE N47°57'30"E 387.75 FEET; THENCE S41°53'03"E 1025.08 FEET; THENCE S22°05'14"W 521.60 FEET; THENCE S88°17'32"W 805.39 FEET TO THE POINT OF BEGINNING.

MUXLOW
SURVEYING & ENGINEERING
4064 MAIN ST.
BROWN CITY, MI 48416
(810) 346-6300
(866) 610-6915 FAX

GENERAL MOTORS CORPORATION
300 RENAISSANCE CTR.
DETROIT, MI

MFD-WELD TOOL
DORT HIGHWAY

SECTION 9, T6N-R7E
GRAND BLANC TWP.
GENESEE CO., MI

BOUNDARY SURVEY

ISSUED FOR:

REVISIONS:

FILE: 9375
PROJECT MGR: TAM
DESIGNED BY:
DRAWN BY: PMN
SCALE: 1" = 400'
SHEET: 1 OF 1

BNDY
9375

EXHIBIT 3
HAZARDOUS SUBSTANCES ABOVE CRITERIA[1] IN SOILS OR GROUNDWATER

MEDIA	SUBSTANCE	CRITERIA EXCEEDED
Soil	Benzo(a)pyrene	RDC (2 mg/kg)
	Fluoranthene	GSIP (5.5 mg/kg)
	Naphthalene	GSIP (0.730 mg/kg)
	Phenanthrene	GSIP (2.1 mg/kg)
	Mercury	GSIP (0.50(M); 0.0012 mg/kg)
	Selenium	GSIP (0.4 mg/kg)
Groundwater	Arsenic	RDW (0.1 mg/L), NRDW (0.1 mg/L), GSI (0.1 mg/L)
	Lead	RDW (0.004 mg/L), NRDW (0.004 mg/L), GSI (0.014 mg/L)
	Silver	GSI (0.0002(M); 0.000006 mg/L)
	Selenium	GSI (0.005 mg/L)

GSIP – Groundwater Surface Water Interface Protection
RDC – Residential Direct Contact
RDW - Residential Drinking Water
NRDW – Non-residential Drinking Water
GSI – Groundwater Surface Water Interface
M – Calculated criterion is below the analytical target detection limit.

1 – MDEQ Part 201Generic Cleanup Criteria - Residential Soil and Groundwater Criteria, Table 1 and Table 2, dated December 30, 2013.

EXHIBIT 4
DESCRIPTION OF ALLOWABLE USES

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

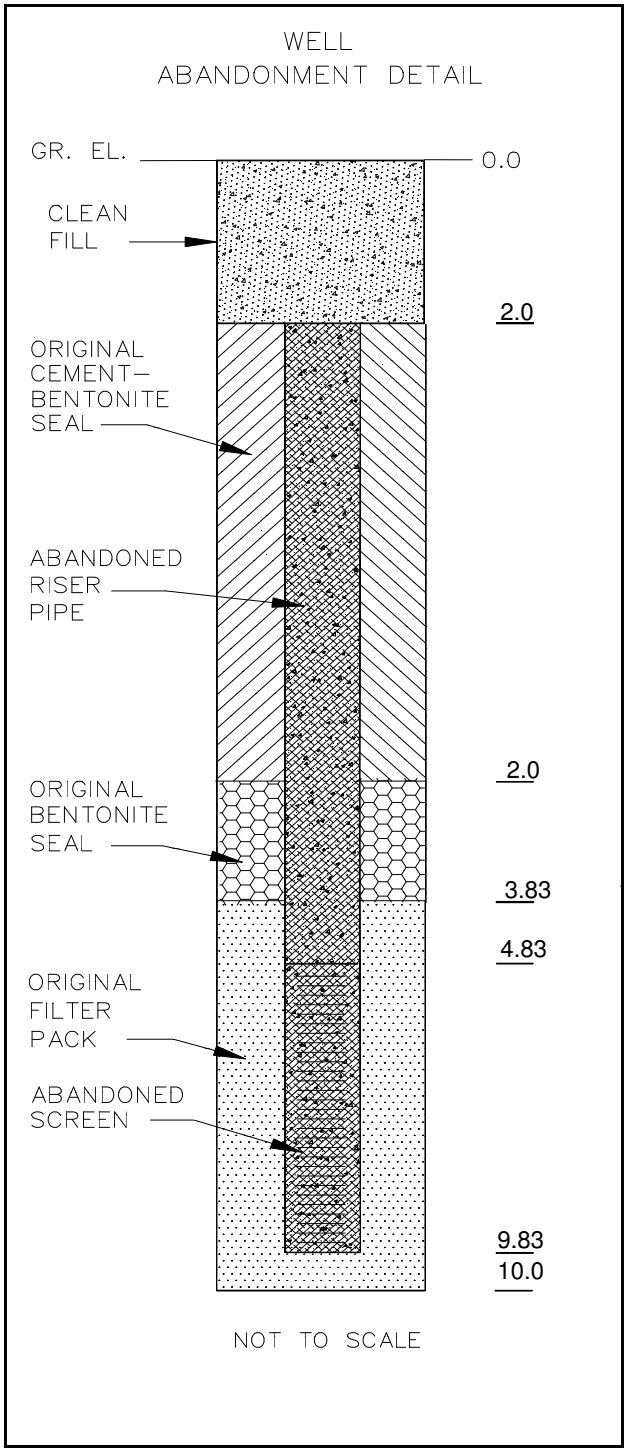
Any residential use is specifically prohibited from the non-residential land use category. This would include the primary use of the Property for human habitation and includes structures such as single family dwellings, multiple family structures, mobile homes, condominiums, and apartment buildings.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

Attachment D – Well Abandonment Logs

WELL ABANDONMENT LOG

Well ID: **MW-1**

Project:	Dort Highway Land	**Client:**	RACER Trust
Location:	Grand Blanc, Michigan	**Date Installed:**	May 30, 2012
Project No.:	62654	**Date Abandoned:**	November 2, 2016



Inspection Notes:

Inspector:	Kevin Schneider
Drilling Contractor:	N/A
Type of Well:	Environmental Monitoring Well

Height of Stickup (ft): 2.5'

Abandonment Method:

Type:	Backfilled In-Place with Bentonite
Date of Casing Removal:	N/A

Drilling Method:

Type:	Hollow-stem Auger	Diameter:	8.5"
Casing:	4.25"		

Seal(s):

Type:	Bentonite	Interval:	0 - 3.83 ft bg
Type:	N/A	Interval:	N/A
Volume:	125 Pounds		

Riser Pipe Left in Place:

Material:	Sch 40 PVC	Diameter:	2" ID
Interval:	2.5 (above grade) - 4.83 ft bg		

Screen Material Left In Place:

Material:	Sch 40 PVC	Diameter:	2" ID
Interval:	4.83 - 9.83 ft bg		

Notes:

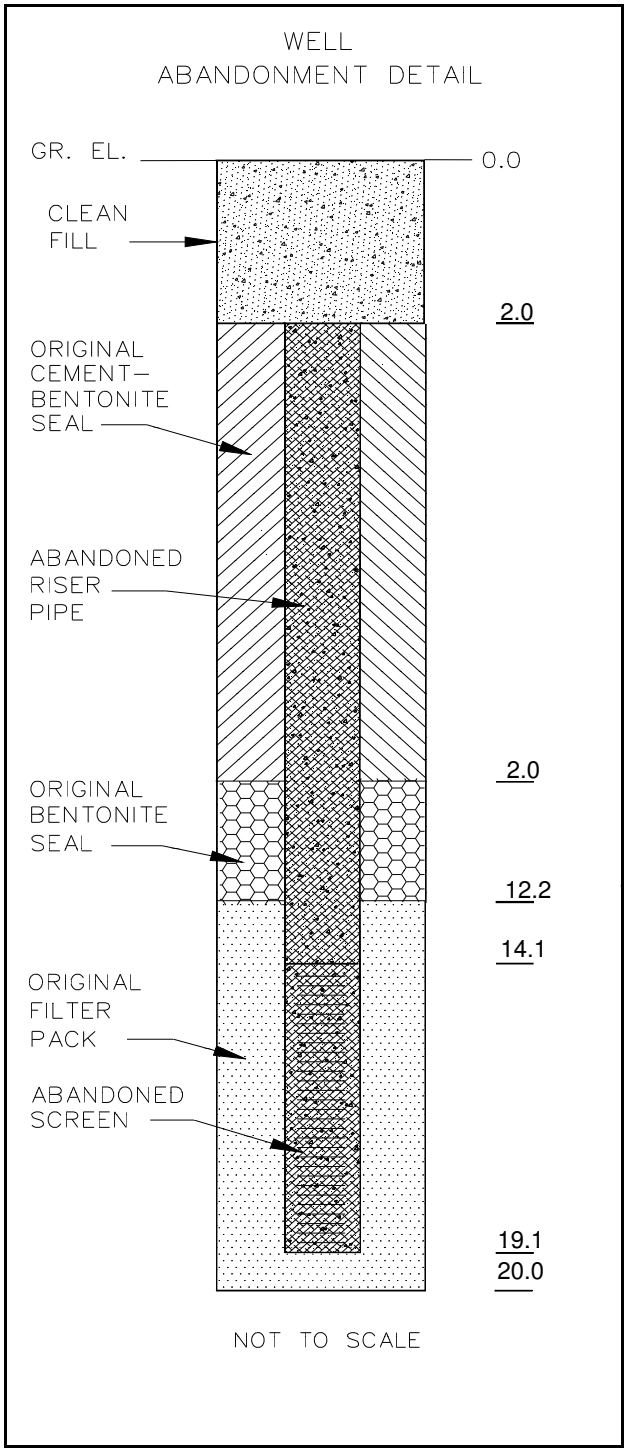
1. Riser pipe removed to a depth of 2.0 feet below grade and six inches of bentonite were placed over riser.
3. "NA" indicates not applicable.
4. "ft bg" indicates feet below grade.
5. All Elevations in feet above mean sea level.
6. Abandoned in accordance with GWQC Act (Part 127 of PA 368 of 1978).

O'BRIEN & GERE

WELL ABANDONMENT LOG

Well ID: **MW-2**

Project:	Dort Highway Land	**Client:**	RACER Trust
Location:	Grand Blanc, Michigan	**Date Installed:**	May 30, 2012
Project No.:	62654	**Date Abandoned:**	November 2, 2016



Inspection Notes:

Inspector:	Kevin Schneider
Drilling Contractor:	N/A
Type of Well:	Environmental Monitoring Well

Height of Stickup (ft): 2.5'

Abandonment Method:

Type:	Backfilled In-Place with Bentonite
Date of Casing Removal:	N/A

Drilling Method:

Type:	Hollow-stem Auger	Diameter:	8.5"
Casing:	4.25"		

Seal(s):

Type:	Bentonite	Interval:	0 - 12.2 ft bg
Type:	N/A	Interval:	N/A
Volume:	250 Pounds		

Riser Pipe Left in Place:

Material:	Sch 40 PVC	Diameter:	2" ID
Interval:	2.5 (above grade) - 14.1 ft bg		

Screen Material Left In Place:

Material:	Sch 40 PVC	Diameter:	2" ID
Interval:	14.1 - 19.1 ft bg		

Notes:

1. Riser pipe removed to a depth of 2.0 feet below grade. six inches of bentonite were placed over riser.
3. "NA" indicates not applicable.
4. "ft bg" indicates feet below grade.
5. All Elevations in feet above mean sea level.
6. Abandoned in accordance with GWQC Act (Part 127 of PA 368 of 1978).

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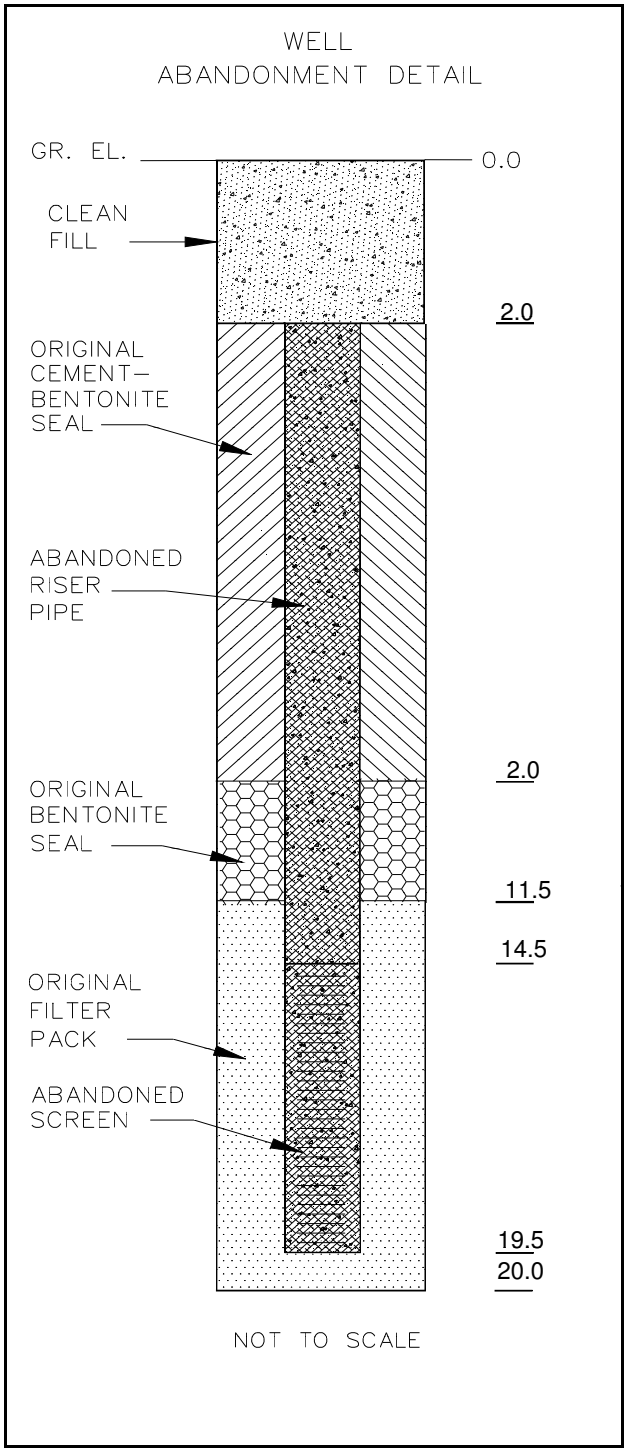
WELL ABANDONMENT LOG

Well ID: **MW2-1**

Project:	Dort Highway Land	**Client:**	RACER Trust
Location:	Grand Blanc, Michigan	**Date Installed:**	November 20, 2006
Project No.:	62654	**Date Abandoned:**	November 2, 2016



Inspection Notes:

Inspector:	Kevin Schneider
Drilling Contractor:	N/A
Type of Well:	Environmental Monitoring Well

Height of Stickup (ft): 2.0'

Abandonment Method:

Type:	Backfilled In-Place with Bentonite
Date of Casing Removal:	N/A

Drilling Method:

Type:	Hollow-stem Auger	Diameter:	8.5"
Casing:	4.25"		

Seal(s):

Type:	Bentonite	Interval:	0 - 11.5 ft bg
Type:	N/A	Interval:	N/A
Volume:			

Riser Pipe Left in Place:

Material:	Sch 40 PVC	Diameter:	2" ID
Interval:	2.0 (above grade) - 14.5 ft bg		

Screen Material Left In Place:

Material:	Sch 40 PVC	Diameter:	2" ID
Interval:	14.5 - 19.5 ft bg		

Notes:

1. Riser pipe removed to a depth of 2.0 feet below grade. six inches of bentonite were placed over riser.
3. "NA" indicates not applicable.
4. "ft bg" indicates feet below grade.
5. All Elevations in feet above mean sea level.
6. Abandoned in accordance with GWQC Act (Part 127 of PA 368 of 1978).

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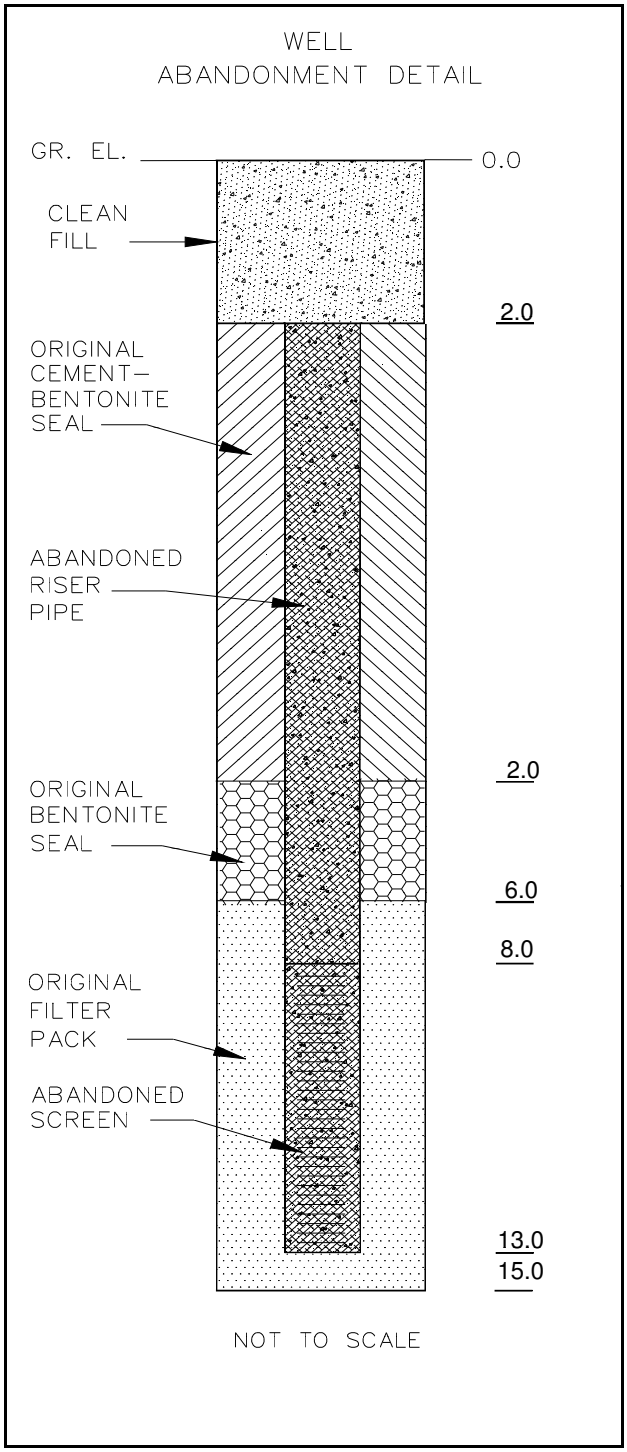
WELL ABANDONMENT LOG

Well ID: **MW-3**

Project:	Dort Highway Land	**Client:**	RACER Trust
Location:	Grand Blanc, Michigan	**Date Installed:**	May 30, 2012
Project No.:	62654	**Date Abandoned:**	November 2, 2016



Inspection Notes:

Inspector:	Kevin Schneider
Drilling Contractor:	N/A
Type of Well:	Environmental Monitoring Well

Height of Stickup (ft): 2.0'

Abandonment Method:

Type:	Backfilled In-Place with Bentonite
Date of Casing Removal:	N/A

Drilling Method:

Type:	Hollow-stem Auger	Diameter:	8.5"
Casing:	4.25"		

Seal(s):

Type:	Bentonite	Interval:	0 - 6.0 ft bg
Type:	N/A	Interval:	N/A
Volume:	200 Pounds		

Riser Pipe Left in Place:

Material:	Sch 40 PVC	Diameter:	2" ID
Interval:	2.0 (above grade) - 8.0 ft bg		

Screen Material Left In Place:

Material:	Sch 40 PVC	Diameter:	2" ID
Interval:	8.0 - 13.0 ft bg		

Notes:

1. Riser pipe removed to a depth of 2.0 feet below grade. six inches of bentonite were placed over riser.
3. "NA" indicates not applicable.
4. "ft bg" indicates feet below grade.
5. All Elevations in feet above mean sea level.
6. Abandoned in accordance with GWQC Act (Part 127 of PA 368 of 1978).

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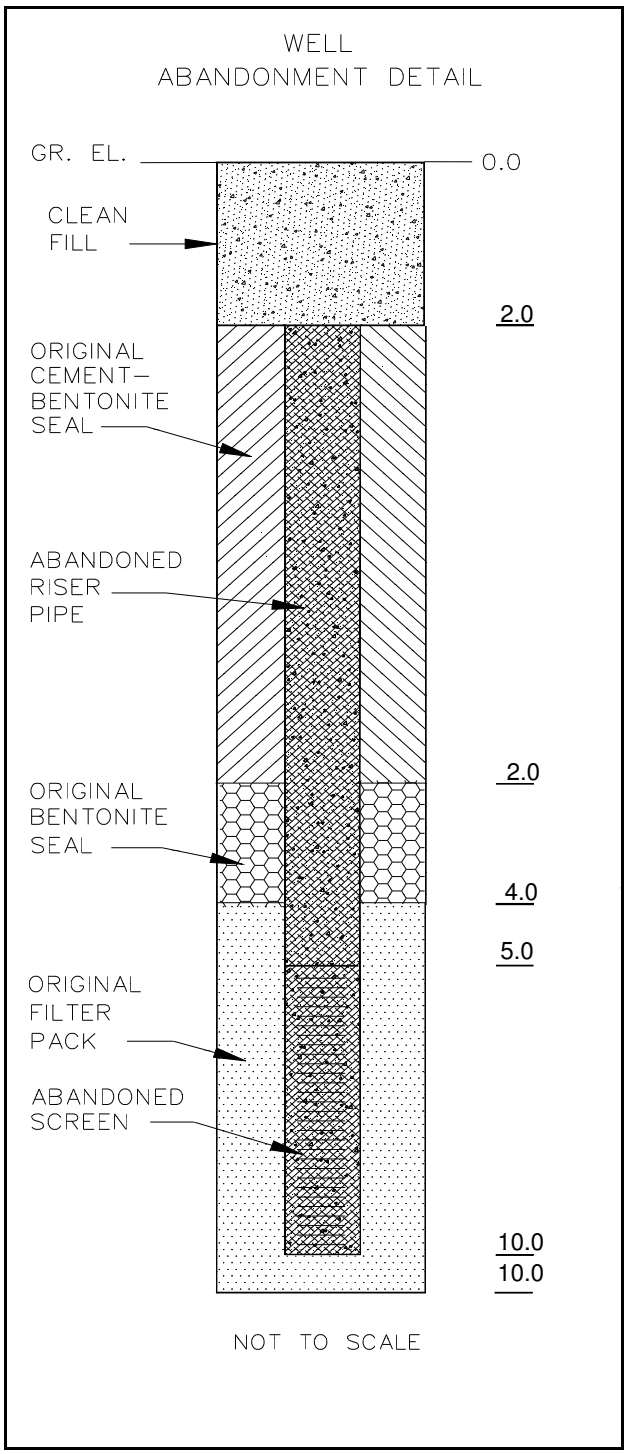
WELL ABANDONMENT LOG

Well ID: **MW-4**

Project:	Dort Highway Land	**Client:**	RACER Trust
Location:	Grand Blanc, Michigan	**Date Installed:**	May 31, 2012
Project No.:	62654	**Date Abandoned:**	November 2, 2016



Inspection Notes:

Inspector: Kevin Schneider
Drilling Contractor: N/A
Type of Well: Environmental Monitoring Well

Height of Stickup (ft):

Abandonment Method:

Type: Backfilled In-Place with Bentonite
Date of Casing Removal: N/A

Drilling Method:

Type: Hollow-stem Auger Diameter: 8.5"
Casing: 4.25"

Seal(s):

Type: Bentonite Interval: 0 - 4.0 ft bg
Type: N/A Interval: N/A
Volume: 100 Pounds

Riser Pipe Left in Place:

Material: Sch 40 PVC Diameter: 2" ID
Interval: 2.0 (above grade) - 5.0 ft bg

Screen Material Left In Place:

Material: Sch 40 PVC Diameter: 2" ID
Interval: 5.0 - 10.0 ft bg

Notes:

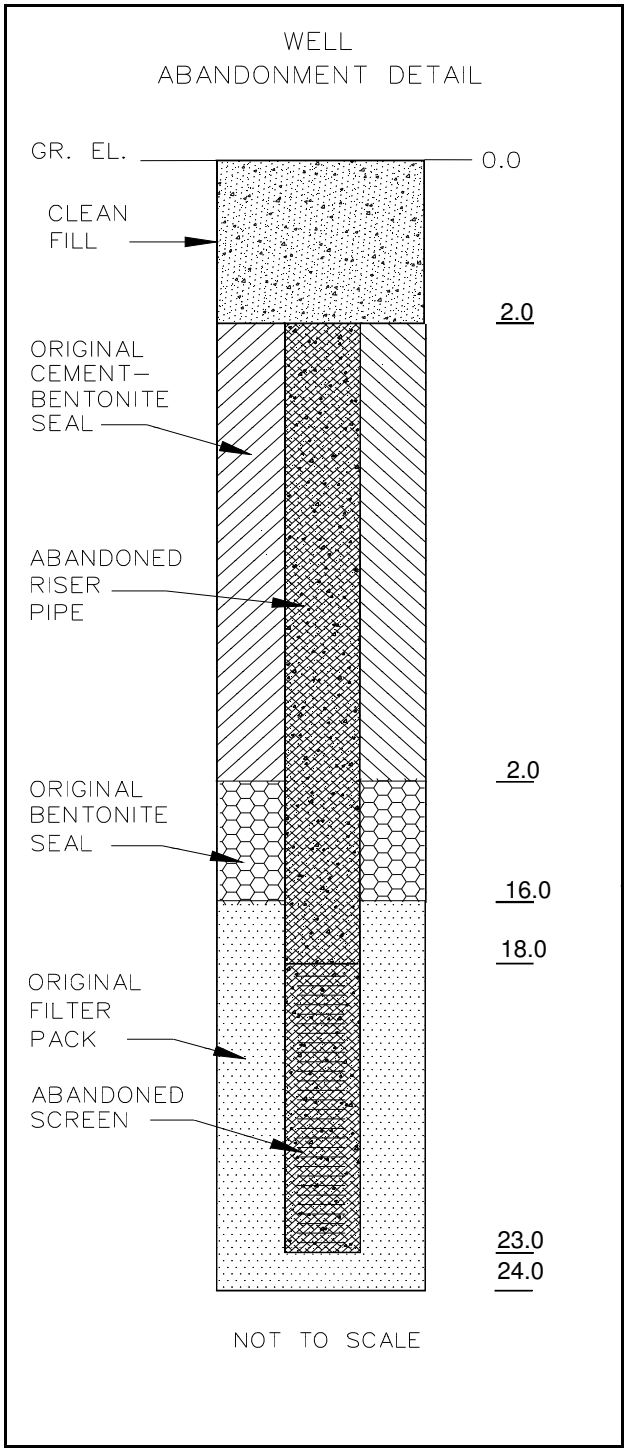
1. Riser pipe removed to a depth of 2.0 feet below grade. six inches of bentonite were placed over riser.
3. "NA" indicates not applicable.
4. "ft bg" indicates feet below grade.
5. All Elevations in feet above mean sea level.
6. Abandoned in accordance with GWQC Act (Part 127 of PA 368 of 1978).

O'BRIEN & GERE

WELL ABANDONMENT LOG

Well ID: **MW-5**

Project:	Dort Highway Land	**Client:**	RACER Trust
Location:	Grand Blanc, Michigan	**Date Installed:**	May 31, 2012
Project No.:	62654	**Date Abandoned:**	November 2, 2016



Inspection Notes:

Inspector:	Kevin Schneider
Drilling Contractor:	N/A
Type of Well:	Environmental Monitoring Well

Height of Stickup (ft): 2.0'

Abandonment Method:

Type:	Backfilled In-Place with Bentonite
Date of Casing Removal:	N/A

Drilling Method:

Type:	Hollow-stem Auger	Diameter:	8.5"
Casing:	4.25"		

Seal(s):

Type:	Bentonite	Interval:	0 - 16.0 ft bg
Type:	N/A	Interval:	N/A
Volume:	400 Pounds		

Riser Pipe Left in Place:

Material:	Sch 40 PVC	Diameter:	2" ID
Interval:	2.0 (above grade) - 18.0 ft bg		

Screen Material Left In Place:

Material:	Sch 40 PVC	Diameter:	2" ID
Interval:	18.0 - 23.0 ft bg		

Notes:

1. Riser pipe removed to a depth of 2.0 feet below grade. six inches of bentonite were placed over riser.
3. "NA" indicates not applicable.
4. "ft bg" indicates feet below grade.
5. All Elevations in feet above mean sea level.
6. Abandoned in accordance with GWQC Act (Part 127 of PA 368 of 1978).

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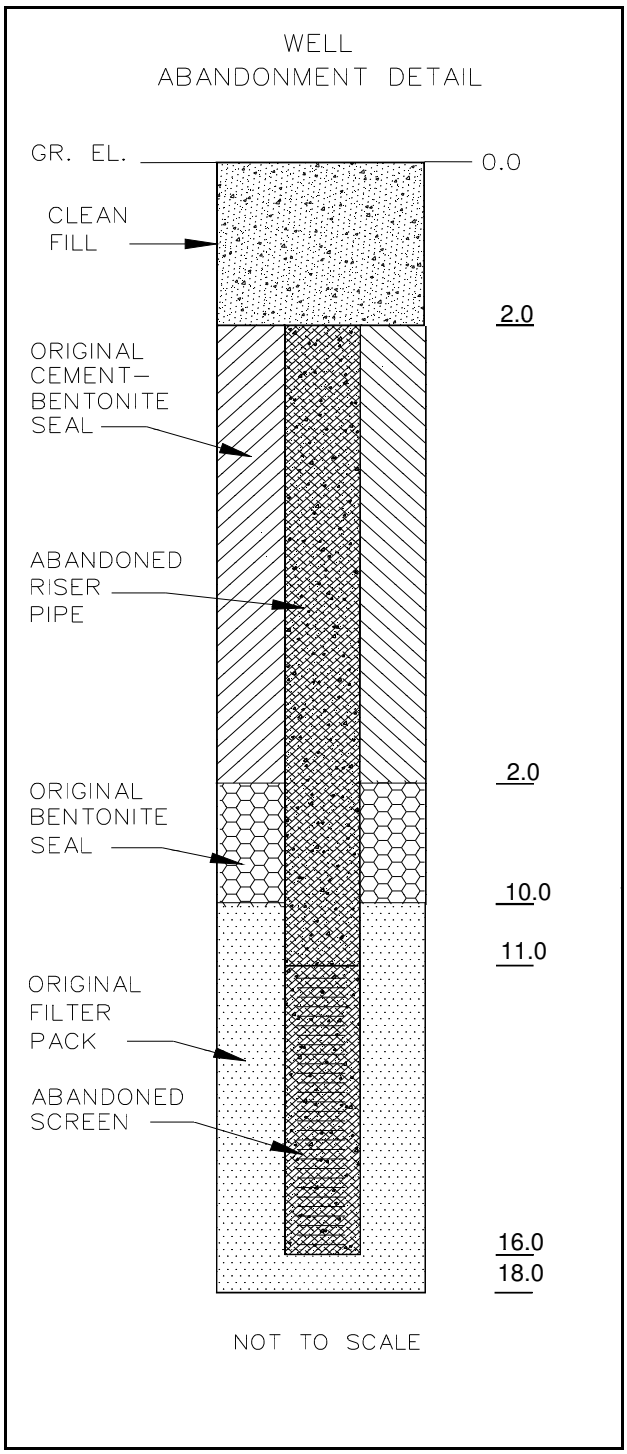
WELL ABANDONMENT LOG

Well ID: **MW-6**

Project:	Dort Highway Land	**Client:**	RACER Trust
Location:	Grand Blanc, Michigan	**Date Installed:**	June 8, 2012
Project No.:	62654	**Date Abandoned:**	November 2, 2016



Inspection Notes:

Inspector:	Kevin Schneider
Drilling Contractor:	N/A
Type of Well:	Environmental Monitoring Well

Height of Stickup (ft): 2.0'

Abandonment Method:

Type:	Backfilled In-Place with Bentonite
Date of Casing Removal:	N/A

Drilling Method:

Type:	Hollow-stem Auger	Diameter:	8.5"
Casing:	4.25"		

Seal(s):

Type:	Bentonite	Interval:	0 - 16.0 ft bg
Type:	N/A	Interval:	N/A
Volume:	300 Pounds		

Riser Pipe Left in Place:

Material:	Sch 40 PVC	Diameter:	2" ID
Interval:	2.0 (above grade) - 11.0 ft bg		

Screen Material Left In Place:

Material:	Sch 40 PVC	Diameter:	2" ID
Interval:	11.0 - 16.0 ft bg		

Notes:

1. Riser pipe removed to a depth of 2.0 feet below grade. six inches of bentonite were placed over riser.
3. "NA" indicates not applicable.
4. "ft bg" indicates feet below grade.
5. All Elevations in feet above mean sea level.
6. Abandoned in accordance with GWQC Act (Part 127 of PA 368 of 1978).

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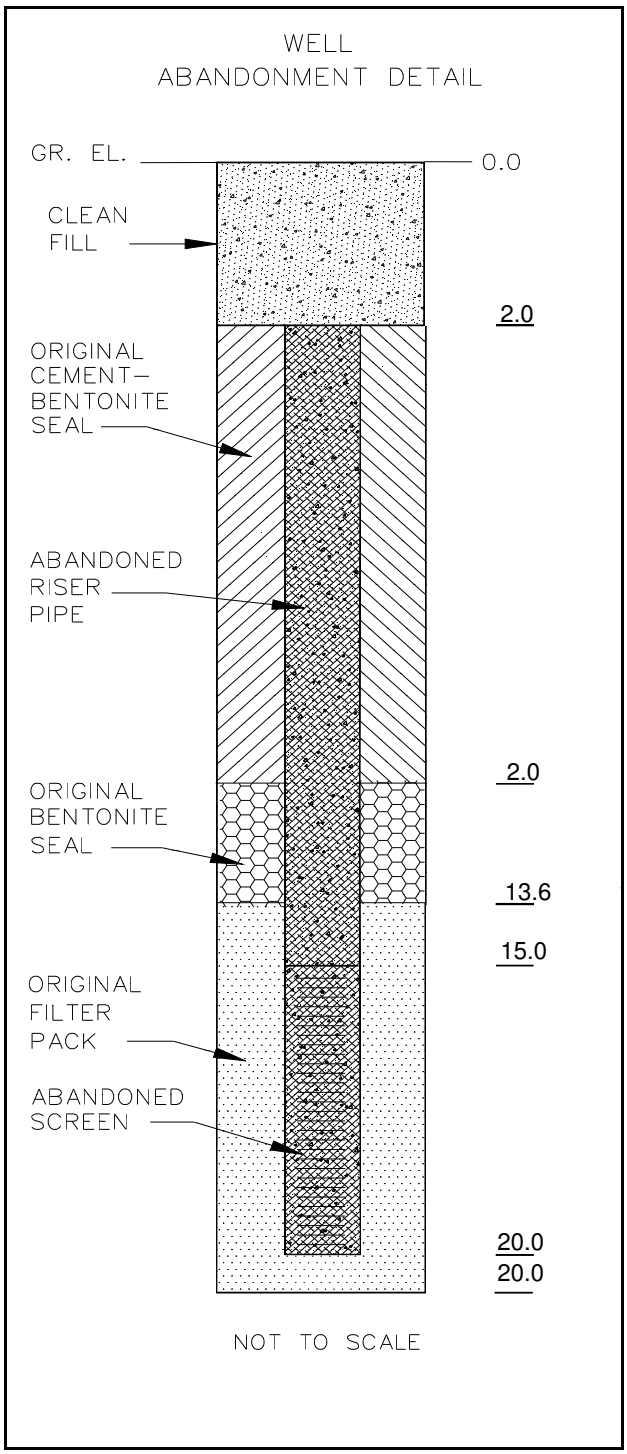
WELL ABANDONMENT LOG

Well ID: **MW-7**

Project:	Dort Highway Land	**Client:**	RACER Trust
Location:	Grand Blanc, Michigan	**Date Installed:**	June 8, 2012
Project No.:	62654	**Date Abandoned:**	November 2, 2016



Inspection Notes:

Inspector:	Kevin Schneider
Drilling Contractor:	N/A
Type of Well:	Environmental Monitoring Well

Height of Stickup (ft): 2.0'

Abandonment Method:

Type:	Backfilled In-Place with Bentonite
Date of Casing Removal:	N/A

Drilling Method:

Type:	Hollow-stem Auger	Diameter:	8.5"
Casing:	4.25"		

Seal(s):

Type:	Bentonite	Interval:	0 - 13.6 ft bg
Type:	N/A	Interval:	N/A
Volume:	200 Pounds		

Riser Pipe Left in Place:

Material:	Sch 40 PVC	Diameter:	2" ID
Interval:	2.0 (above grade) - 15.0 ft bg		

Screen Material Left In Place:

Material:	Sch 40 PVC	Diameter:	2" ID
Interval:	15.0 - 20.0 ft bg		

Notes:

1. Riser pipe removed to a depth of 2.0 feet below grade.
   six inches of bentonite were placed over riser.
3. "NA" indicates not applicable.
4. "ft bg" indicates feet below grade.
5. All Elevations in feet above mean sea level.
6. Abandoned in accordance with GWQC Act (Part 127 of PA 368 of 1978).

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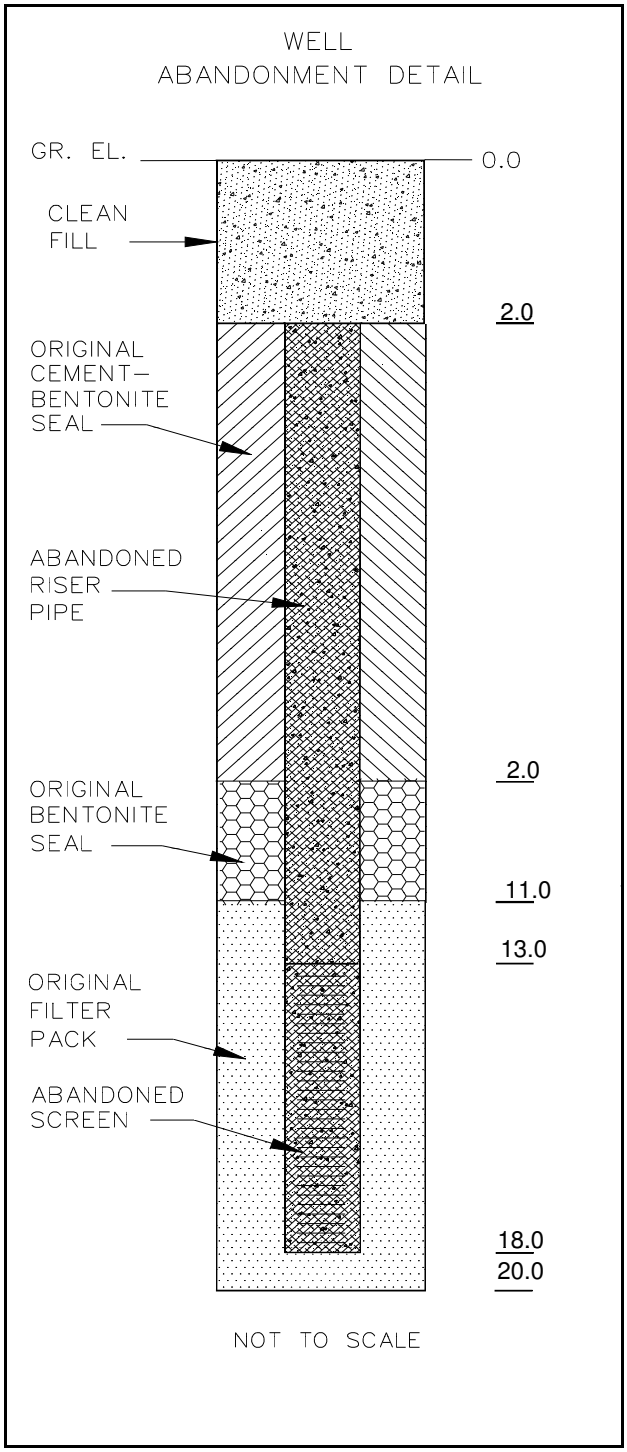
WELL ABANDONMENT LOG

Well ID: **MW-8**

Project:	Dort Highway Land	**Client:**	RACER Trust
Location:	Grand Blanc, Michigan	**Date Installed:**	June 8, 2012
Project No.:	62654	**Date Abandoned:**	November 2, 2016



Inspection Notes:

Inspector:	Kevin Schneider
Drilling Contractor:	N/A
Type of Well:	Environmental Monitoring Well

Height of Stickup (ft): 2.0'

Abandonment Method:

Type:	Backfilled In-Place with Bentonite
Date of Casing Removal:	N/A

Drilling Method:

Type:	Hollow-stem Auger	Diameter:	8.5"
Casing:	4.25"		

Seal(s):

Type:	Bentonite	Interval:	0 - 11.0 ft bg
Type:	N/A	Interval:	N/A
Volume:	200 Pounds		

Riser Pipe Left in Place:

Material:	Sch 40 PVC	Diameter:	2" ID
Interval:	2.0 (above grade) - 13.0 ft bg		

Screen Material Left In Place:

Material:	Sch 40 PVC	Diameter:	2" ID
Interval:	13.0 - 18.0 ft bg		

Notes:

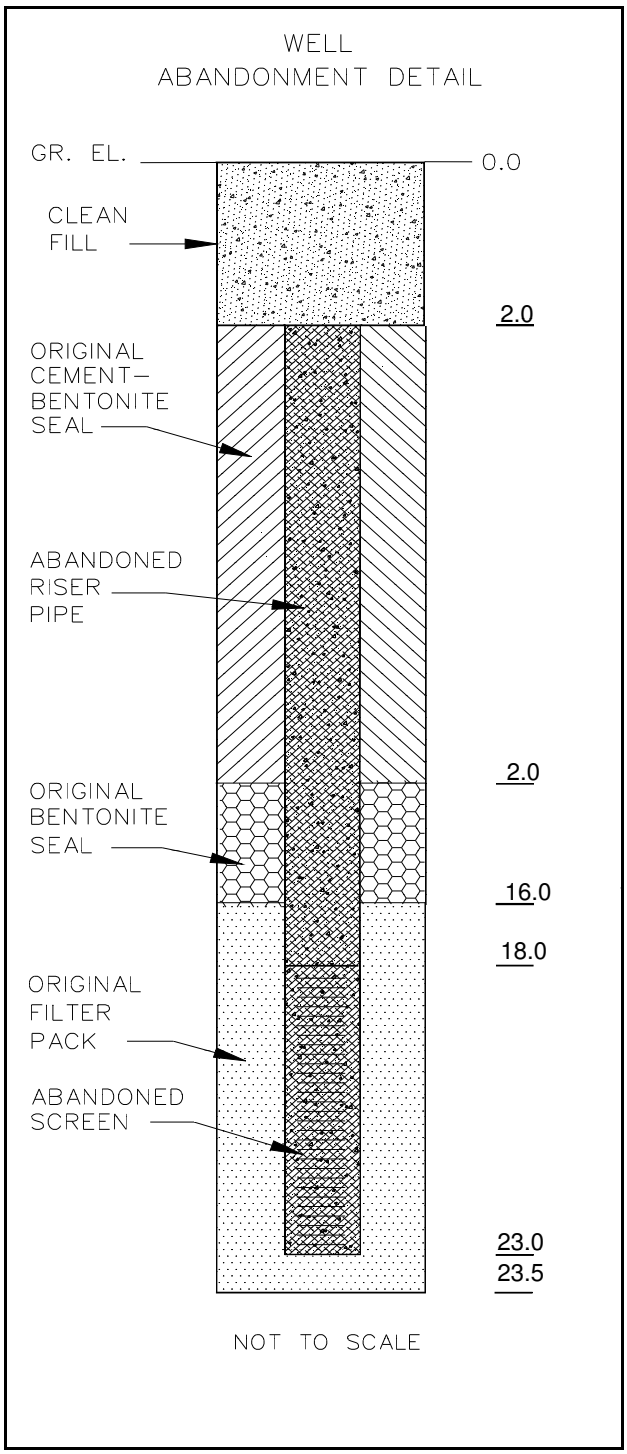
1. Riser pipe removed to a depth of 2.0 feet below grade. six inches of bentonite were placed over riser.
3. "NA" indicates not applicable.
4. "ft bg" indicates feet below grade.
5. All Elevations in feet above mean sea level.
6. Abandoned in accordance with GWQC Act (Part 127 of PA 368 of 1978).

O'BRIEN & GERE

WELL ABANDONMENT LOG

Well ID: **MW-9**

Project:	Dort Highway Land	**Client:**	RACER Trust
Location:	Grand Blanc, Michigan	**Date Installed:**	May 31, 2012
Project No.:	62654	**Date Abandoned:**	November 2, 2016



Inspection Notes:

Inspector:	Kevin Schneider
Drilling Contractor:	N/A
Type of Well:	Environmental Monitoring Well

Height of Stickup (ft): 2.0'

Abandonment Method:

Type:	Backfilled In-Place with Bentonite
Date of Casing Removal:	N/A

Drilling Method:

Type:	Hollow-stem Auger	Diameter:	8.5"
Casing:	4.25"		

Seal(s):

Type:	Bentonite	Interval:	0 - 16.0 ft bg
Type:	N/A	Interval:	N/A
Volume:	400 Pounds		

Riser Pipe Left in Place:

Material:	Sch 40 PVC	Diameter:	2" ID
Interval:	2.0 (above grade) - 18.0 ft bg		

Screen Material Left In Place:

Material:	Sch 40 PVC	Diameter:	2" ID
Interval:	18.0 - 23.0 ft bg		

Notes:

1. Riser pipe removed to a depth of 2.0 feet below grade. six inches of bentonite were placed over riser.
3. "NA" indicates not applicable.
4. "ft bg" indicates feet below grade.
5. All Elevations in feet above mean sea level.
6. Abandoned in accordance with GWQC Act (Part 127 of PA 368 of 1978).

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Attachment E – Well Abandonment Photo Log

ATTACHMENT E – PHOTOGRAPHIC LOG

CLIENT NAME:	SITE LOCATION:	PROJECT NO.
RACER Trust	Grand Blanc, Michigan	62654

PHOTO NO.	DATE:
1	11/2/2016

DESCRIPTION

Monitoring well MW-1 prior to abandonment.

CLIENT NAME:	SITE LOCATION:	PROJECT NO.
RACER Trust	Grand Blanc, Michigan	62654

PHOTO NO.	DATE:
2	11/2/2016

DESCRIPTION

Monitoring well MW-1 subsequent to filling well casing with bentonite chips.

CLIENT NAME:	SITE LOCATION:	PROJECT NO.
RACER Trust	Grand Blanc, Michigan	62654

PHOTO NO.	DATE:
3	11/2/2016

DESCRIPTION

Monitoring well MW-6 prior to abandonment.

CLIENT NAME:	SITE LOCATION:	PROJECT NO.
RACER Trust	Grand Blanc, Michigan	62654

PHOTO NO.	DATE:
4	11/2/2016

DESCRIPTION

Monitoring well MW-6 subsequent to filling well casing with bentonite chips.

Attachment F – Referenced Documents

ATTACHMENT F - REFERENCE DOCUMENTS

- O'Brien & Gere Engineers, Inc., 2005. Phase I Environmental Site Assessment, MFD – Grand Blanc (Site #029), Grand Blanc, Michigan. October.
- O'Brien & Gere Engineers, Inc., 2007. Phase II Environmental Site Assessment, MFD Area 2 – Grand Blanc (Site #029), Grand Blanc, Michigan. May.
- O'Brien & Gere Engineers, Inc., 2007. Delineation Investigation, MFD Area 2 – Grand Blanc (Site #029), Grand Blanc, Michigan. December.
- O'Brien & Gere Engineers, Inc., 2009. Additional Services – Area 2 Remediation Activities. April 20.
- O'Brien & Gere Engineers, Inc., 2010. Phase I Environmental Site Assessment, MLC Site #1296 – Dort Highway Land, Grand Blanc, Michigan. May.
- O'Brien & Gere. 2011. Site History and Current Conditions Report, Dort Highway Land, Grand Blanc, Michigan. Farmington Hills, Michigan. August.
- O'Brien & Gere. 2011. Floor Block Area Investigation & Corrective Measures Alternative Analysis, Dort Highway Land, Grand Blanc, Michigan. Farmington Hills, Michigan. October 28.
- O'Brien & Gere. 2012. Revised Groundwater Investigation Work Plan, Dort Highway Land, Grand Blanc, Michigan. Farmington Hills, Michigan. May 24.
- O'Brien & Gere. 2012. Groundwater Investigation Report, Dort Highway Land, Grand Blanc, Michigan. Farmington Hills, Michigan. August 13.
- U.S. EPA. 2012. Current Human Exposures Under Control (RCRA Corrective Action EI Determination – CA725), Dort Highway Land, Affronting Dort Highway, Grand Blanc, Michigan 48439. MID 005 356 944. Region V, Chicago, Illinois. October 25.
- O'Brien & Gere. 2013. Groundwater Investigation Report, Quarters 2-4, Dort Highway Land, Grand Blanc, Michigan. Farmington Hills, Michigan. May.
- O'Brien & Gere. 2013. Migration of Contaminated Groundwater Under Control (RCRA Corrective Action EI Determination – CA750), Dort Highway Land, Affronting Dort Highway, Grand Blanc, Michigan 48439. MID 005 356 944. June.
- O'Brien & Gere. 2013. Corrective Measures Study Report, Dort Highway Land, Grand Blanc, Michigan. Farmington Hills, Michigan. June.

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THERE'S A WAY