



Excavated Materials Management Plan

Former Willow Run Powertrain Redevelopment Area
Ypsilanti, Michigan

GHD | 14496 Sheldon Road Suite 200 Plymouth Michigan 48170
017358 | Report No 39 | June 2 2017



Table of Contents

1.	Introduction.....	1
2.	Properties Guided By Plan.....	1
3.	Materials Guided By Plan.....	1
4.	Overview of Excavated Material Management	2
4.1	Excavated Pavement Management in General	2
4.2	Excavated Soil Management in General	3
4.3	Site-specific Excavation Factors	3
4.4	Site-specific Excavated Material Management Factors.....	4
4.5	Approvals for Excavations and Options for Material Management	5
5.	Case-Specific Excavation Evaluations and Plans.....	7
6.	Documentation and Record Keeping	7
7.	Sources of Data Defining Site Conditions	8

Figure Index

Figure 1	Redevelopment Area Boundaries
Figure 2	General Process of Plan
Figure 3	Excavated Pavement Management
Figure 4	Options for Soil Management
Figure 5	Summary – Part 201 Soil Relocation Regulations
Figure 6	PCE Impacted Areas
Figure 7	Mn and As Impacted Areas
Figure 8	LNAPL Impacted Areas
Figure 9	Storm Sewers
Figure 10	Historic Electrical Ducts
Figure 11	Covered Area
Figure 12	Stormwater Catchment Area
Figure 13	Excavation Areas

Table Index

Table 1	Excavated Materials Management Summary
---------	--



Appendix Index

Appendix A	RCRA Restrictive Covenants
Appendix B	TSCA Restrictive Covenant
Appendix C	PCE Soil at Former Building 19 Area Not Listed Hazardous Waste
Appendix D	Use of Qualifying Excavated Material As Fill At The Covered Area
Appendix E	Excavation Area 2 – Swale to FFB- B
Appendix F	Excavation Area 3 – First Flush Basin C
Appendix G	Excavation Area 4 - Swale to FFB-C
Appendix H	Excavation Area 1 - First Flush Basin B
Appendix I	Excavation Area 5 - French Drain/Utility Trench
Appendix J	Landowners Approvals and Notifications to MDEQ
Appendix K	RACER and MDEQ Approval Form



1. Introduction

This Excavated Materials Management Plan (EMMP or Plan) has been prepared by GHD Services Inc. (GHD) on behalf of Revitalizing Automotive Communities Environmental Response Trust (RACER) to assist in the proper stewardship of soil and other materials which may be removed from the land surface in the course of creating new features to support the American Center for Mobility (ACM), Yankee Air Museum (YAM), and others at the area of the former Willow Run Powertrain facility (Willow Run). The Plan can assist in directing development activities at Willow Run undertaken by ACM, YAM, and RACER.

The objective of the Plan is: *To provide guidance for the efficient management of excavated soil and pavement at the property, including where appropriate beneficial re-uses, and contribute to the sustainability of ACM, YAM, and other operations in a responsible manner which is compliant with relevant regulations, restrictive covenants, and purchaser agreements.*

2. Properties Guided By Plan

Properties guided by the Plan encompass approximately 350 acres at the Willow Run area of Ypsilanti, Michigan, and collectively constitute the "Redevelopment Area" (Site) that is the subject of this Plan. Attached Figure 1 shows the location and boundary of the Site, which is in Section 12 of Ypsilanti Township of Washtenaw County with small portions on the east in Van Buren Township of Wayne County. Parties owning and/or conducting operations at the Site include the Willow Run Arsenal for Democracy (WRAD), ACM, YAM, RACER and the Wayne County Airport Authority (WCAA). The Plan provides guidance for activities which may be undertaken by property owners and operators either individually or collectively, and as may be relevant and appropriate for individual actions at specific parcels.

3. Materials Guided By Plan

Materials guided by this plan are of two general types:

- **Pavement** – constructed material previously serving as roadways or building flooring, which may be composed of concrete, asphalt, brick, and other masonry products, and will be removed in some areas and generally crushed and reused at the Site. The Plan addresses management of pavement, which is assumed to include minor amounts of additional infrastructure as is commonly encountered incidental to removal (e.g., piping, wiring, metal anchoring and reinforcing structures, etc.). Should an area of pavement excavation include an unusual amount of additional infrastructure, those materials are to be evaluated and managed as appropriate relative to their particular characteristics, regulations, and options. Pavement is considered to not contain foreign substances requiring specific management unless: 1) it is covered in whole or in part by lead-based paint, which by statute is considered "materially contaminated" or 2) it has been impacted by a specific historic contaminant release. (Note that "Typical surface oil staining on pavement and concrete from driveways, roadways, and parking lots is not material



contamination" per Section 11504(2)(e)(ii) of 1994 PA 451 as amended, the Natural Resources and Environmental Protection Act or NREPA).

- **Soil** – earth material, either naturally occurring or previously placed in the course of property use and development. Excavated soil may be impacted by a wide range of foreign substances and environmental conditions, necessitating a good understanding of its characteristics, as has been determined for much of the Site, or in some cases may need be further assessed, in order to confirm or make appropriate management decisions. In cases where soil is not expected to be impacted by foreign substances, excavation and re-use can proceed with monitoring of the activity provided that it is sufficient to notice unanticipated conditions and results in further evaluation and review/revision of soil management actions as may be needed.

4. Overview of Excavated Material Management

As a general practice, prior to excavating specific Site materials, Pre-Excavation Inquiry is performed to determine if the excavation area is one of concern that may require Case-specific Practices (and approvals), or if the material is clean soil and pavement that can be managed pursuant to Standard Practices as non-regulated material (i.e., re-use and disposal with no or limited regulatory obligations).

As described later in this Plan, several specific excavation areas have already proceeded through Pre-Excavation Inquiry and Case-specific practices are identified for five areas.

Options for the management of materials excavated from areas of concern are very dependent upon the characteristics of the materials (and potentially, characteristics of the locations being considered for disposition of the materials). If such conditions are not already sufficiently defined, additional assessments may be required in order to identify options for the fate of the materials. Additionally, Declarations of Restrictive Covenant (Deed Restrictions) establish specific requirements relative to portions of the Site. Deed Restrictions as detailed in Appendix A are imposed on the properties pursuant to NREPA Parts 111 and 201, and the federal Resource Conservation and Recovery Act (RCRA; and the "RCRA Deed Restrictions"). Deed Restrictions as detailed in Appendix B are imposed pursuant to NREPA Parts 111 and 201, RCRA, and the federal Toxic Substances Control Act (TSCA; and the "TSCA Deed Restrictions").

The attached Figure 2 illustrates the general overall process of the Plan, and serves to help direct the appropriate considerations for managing excavation that may be undertaken at areas on the Site, in addition to those which are specifically addressed in this Plan.

4.1 Excavated Pavement Management in General

Figure 3 illustrates general regulatory options for the management of excavated pavement, and particularly the conditions which allow for re-use for construction.

Key factors which influence whether or not re-use is allowed by statute as opposed to requiring specific regulatory approval are:

- Is material from a public right-of-way



- Will the re-use adversely impact state waters
- Does the material include exposed reinforcement bars
- Is it "contaminated"

Which factors are relevant depends on specific origins and uses of the material that satisfy the specific statutory definition of inertness which may be applicable.

Should re-use of the material not be allowable directly by statute, authorization for re-use may be possible via petition to the Michigan Department of Environmental Quality (MDEQ) for the material to be determined inert for a specific use (e.g., "Beneficial Use 2" – construction and road materials).

Absent statutory or agency approval that allows for use of excavated pavement on the Site, management as regulated waste will likely be necessary (e.g., as construction/demo debris or solid waste).

4.2 Excavated Soil Management in General

Figure 4 illustrates general regulatory options for the management of excavated soil from the Site. These options range from un-regulated with no restrictions on use to off-Site disposal at licensed facilities. Of particular importance for this Site is that contaminated soil which is relocated under Section 20120c of NREPA is by definition not regulated as solid waste under NREPA Part 115 (Section 11506(1)(o)).

On-Site soil which is impacted by foreign substances may be re-used under certain well understood and appropriately controlled circumstances provided it is not specifically regulated as "hazardous" waste once "generated" by excavation. A sound understanding of the characteristics of the excavated soil, and of the target destinations for its potential use is required. Figure 5 provides a summary of NREPA Part 201 Section 20120c soil relocation regulations, which can provide a basis for the re-use of impacted soil on-site.

PCE contaminated soil at the former Building 19 location (see Figure 6) may be regulated hazardous waste based upon soil characteristics and requires appropriate evaluation (e.g., "TCLP" analysis) once excavated. The source of the PCE in the soil has been evaluated and MDEQ concurs that the impacted soils are not regulated as "F-listed" hazardous waste (see Appendix C).

4.3 Site-specific Excavation Factors

Many areas of the Site have been characterized sufficiently to allow Pre-Excavation Inquiry to easily identify a potential excavation area as one of concern and therefore requiring consideration of performance according to case-specific practices (including the requirements of Deed Restrictions) as opposed to proceeding with standard practices (areas of clean soil and pavement that is not otherwise regulated or restricted).

Existing information characterizing Site conditions identifies particular areas impacted by past activities that indicate the need for case-specific procedures to be considered due to the presence of substances of concern. Additionally, there are structures at some locations of the Site which require specific care (either avoidance to maintain integrity or disturbance only according to



specifically approved plans). These areas are shown on attached Figures 6, 7, 8, 9, and 10 (as well as within the exhibits of Appendices A and B):

- Perchloroethylene (PCE) impacted areas – Figure 6
- Manganese (Mn) and Arsenic (As) impacted soils - Figure 7
- Light Non-Aqueous Phase Liquids (LNAPL) – Figure 8
- Historic storm sewer system - Figure 9
- Buried historic electrical duct system - Figure 10

At some locations at the Site, PCBs are present and are additional substances of concern which have been addressed by encapsulation in place. Excavation in these areas (Appendix B – exhibit 3) is prohibited by the TSCA Deed Restriction. *Concrete in these areas will not be removed and particular care will be taken to not disturb PCB impacted LNAPL and soil at the location identified as CRA-086M (see exhibit 9 of Appendix B).*

The RCRA Deed Restriction (Appendix A) establishes requirements for RACER and MDEQ approval for activities that would disturb the land surface for areas broader than those shown in Figures 6 - 10 as follows:

- Removal or interference with specified environmental monitoring structures
- Removal of surface cover (see Figure 11)
- Impacting of groundwater collection system function ("French Drain" identified in appendix I; in process of being installed)

4.4 Site-specific Excavated Material Management Factors

Anticipated site development includes the construction of above grade features for which "fill" material will be required. Excavated pavement and soil which is not impacted by contaminants nor otherwise subject to specific restrictions may generally be used for such "construction fill" (provided necessary geotechnical and construction specification requirements are satisfied).

Additionally, areas subject to requirements of deed restrictions provide MDEQ approved controls which allow the placement of some impacted materials at these areas, provided the integrity of the controls is maintained. In particular, the "Covered Area" (CA) of the Site as shown on Figure 11 (and RCRA Deed Restriction Exhibit 5) is an area for which certain "Qualifying Material" (QM) may be used for fill (subject to certain conditions). The CA has been established to have characteristics (existing conditions and controls) which provide appropriate long-term stewardship of QM. Appendix D provides information further describing the area and characteristics which allow for the placement of the QM at the CA.

Precipitation and fluids which may be present on the surface of much of the CA are captured by the Site stormwater management system and delivered for treatment at the Ypsilanti Community Utilities Authority (YCUA) wastewater treatment plant. The "catchment" area for which such water is collected and treated (Stormwater Catchment Area or "SCA") is shown on Figure 12. After October of 2017, treatment of the water from the SCA is anticipated to change from the YCUA to specific



features (swales, basins, etc.) yet to be constructed from which discharge to the waters of the state will be made subject to and consistent with stormwater discharge regulations.

Unless otherwise evaluated and found to be appropriate, staging areas for the temporary placement of excavated materials prior to placement on or off Site will be within the SCA of the CA, and will control short term hazards that may be posed by the material. Placement within this area limits the potential for exposure hazards and environmental impacts due to the inherent characteristics of the CA, such as barriers to infiltration, collection and control of runoff, and isolation from residential and public areas. Any further evaluation and management of such soils following staging must be completed in a timely manner pursuant to Section 20120c(2)(a) of NREPA or they may become subject to controls per other sections of NREPA (i.e., application of criteria of section 20120a(1) or (2)).

Particular care (cover, further isolation, etc.) may be needed for excavated materials placed within the SCA following termination of the stormwater discharge to the YCUA and management pursuant to stormwater requirements for individual systems and areas within the SCA.

4.5 Approvals for Excavations and Options for Material Management

The nature (location and magnitude) of excavations at the Site determines to what extent specific approvals are required from various parties such as: MDEQ, RACER, and landowners. It also impacts options for management of excavated material (which may involve specific approvals from the same parties and/or off-Site disposal facilities).

This Plan identifies three types of approvals RACER provides to facilitate redevelopment at the Site consistent with the objective of this Plan:

- Categorically Approved
- Conditionally Approved
- Specific Approval.

The applicability and nature of these approvals is described in the table below.



Nature of Excavation	Nature of Approval	Excavated Material Management Options
Temporary limited excavations of less than 1 sq yd and 0.5 yd deep at all locations other than PCE impacted area with surface cover restored (<i>de minimis</i> excavations)	Categorically Approved	• Return to excavation • Placement elsewhere on Site under cover • Placement as cover elsewhere with similar cover • Off-Site at licensed facility
Excavations outside of identified impacted areas of: • TSCA “closed” electrical duct system • Stormwater structures • PCE, Mn, & As • LNAPL	Conditionally Approved <u>Conditions of Approval:</u> • Cover of existing type or more robust will be re-established • Excavation will be suspended and specific evaluation/approval pursued upon discovery of unexpected conditions	• Return to excavation • Placement elsewhere on Site under cover • Placement elsewhere as cover if currently is cover or is demonstrated to not be impacted • Off-Site at licensed facility
Excavations within identified impacted areas , both currently identified and any new discoveries	Specific Approval	As per terms of approval

RACER and MDEQ may indicate approval with particular excavation activities through completion of the form provided as Appendix K of this plan.



5. Case-Specific Excavation Evaluations and Plans

Details of pavement and/or soil removal involving various degrees of excavation have been reviewed for five locations as shown on Figure 13:

1. First Flush Basin B (FFB-B)
2. Swale to FFB-B
3. First Flush Basin C (FFB-C)
4. Swales and Drainage-way to FFB-C
5. French Drain/Utility Trench

Each of these areas has been evaluated relative to the guidance of this Plan and specific pavement and/or soil management actions have been identified for consideration by RACER and MDEQ. These evaluations and excavated material management specifications are presented in Appendices E through I and Table 1 provides a summary of the approximate volumes from each area and where they will be placed. Appendix J provides documentation of landowner's approvals for soil relocations and notifications to MDEQ pursuant to Section 20120c of NREPA.

6. Documentation and Record Keeping

Following completion of conditionally approved and specifically approved excavation activities (including final placement of excavated material) the party undertaking the activity shall prepare a report (Summary Report) that summarizes the work, along with providing information to support any activities performed contrary to this Plan (in particular, demonstrations that the alternate activities were necessary and still protective of the public and environment).

The Summary Report, including documentation of the locations of excavations undertaken at the site, and of the disposition of the excavated materials, is to be developed and maintained by the parties conducting the activity, and provided to:

- MDEQ
- Owner and Operator of the excavated area
- Owner and Operator of the location(s) where excavated materials are placed
- RACER Trust

Additionally, documentation of the basis for the management of the material as performed and approved (e.g., material observation & testing records, disposal manifests, etc.) is to be maintained and provided to the same parties if requested.

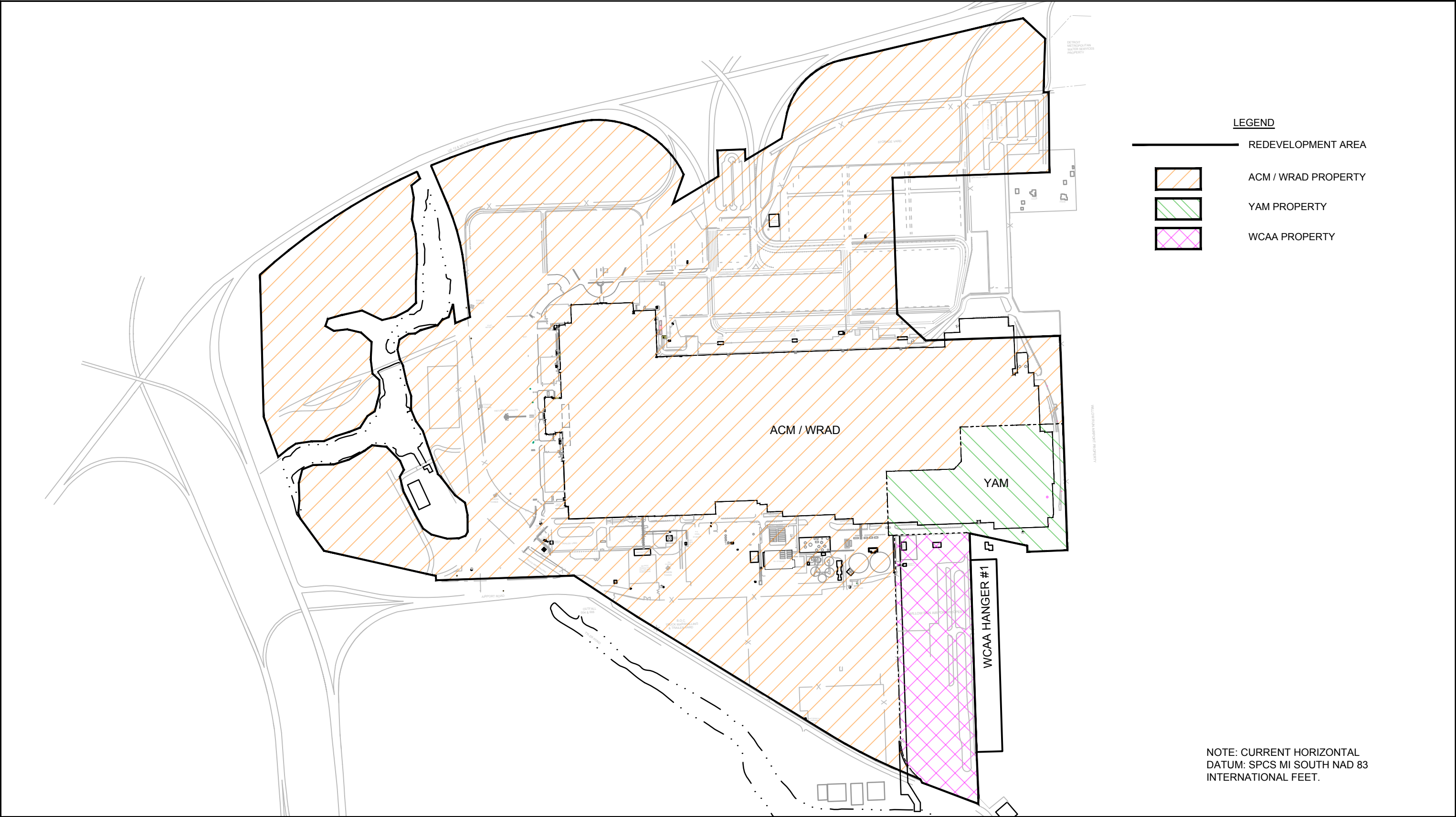


7. Sources of Data Defining Site Conditions

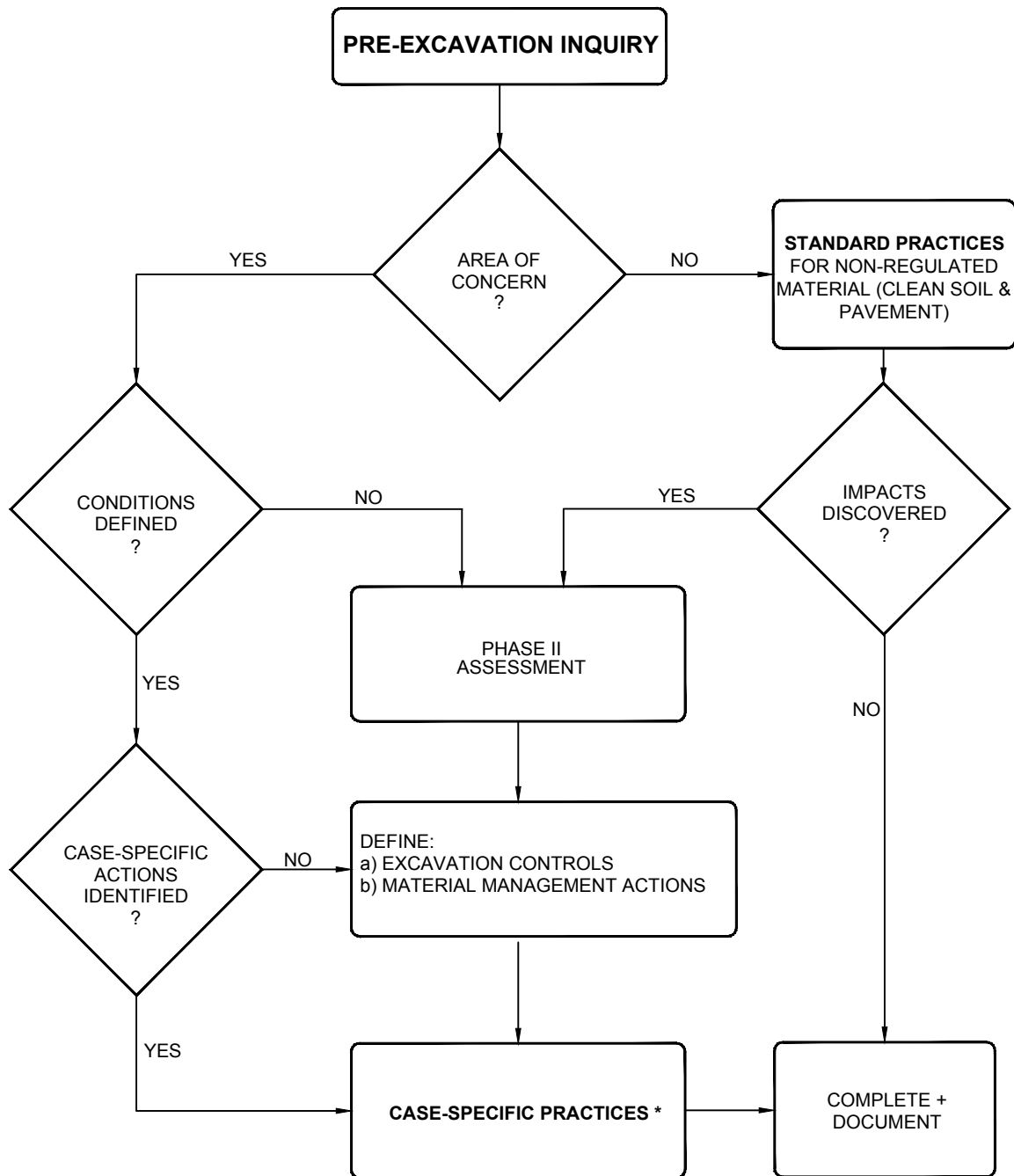
A large amount of data that establishes the nature of conditions at the Site and forms the basis for this Plan has been developed over many years and provided to MDEQ. The primary compilations of this information are as follows, and are available from RACER:

- Resource Conservation and Recovery Act Facility Investigation (RFI) Report (GHD, September 2013)
- Supplemental RFI Report No. 1 (GHD, March 2016)
- Current Conditions Report (GHD, July 2011)
- Various 2016 Investigations (PCE area, alignment borings, site development borings, Phase II, - GHD)

Figures



EXCAVATED MATERIALS MANAGEMENT PLAN
OVERVIEW



* MAY REQUIRE REGULATORY NOTICE
AND/OR APPROVAL

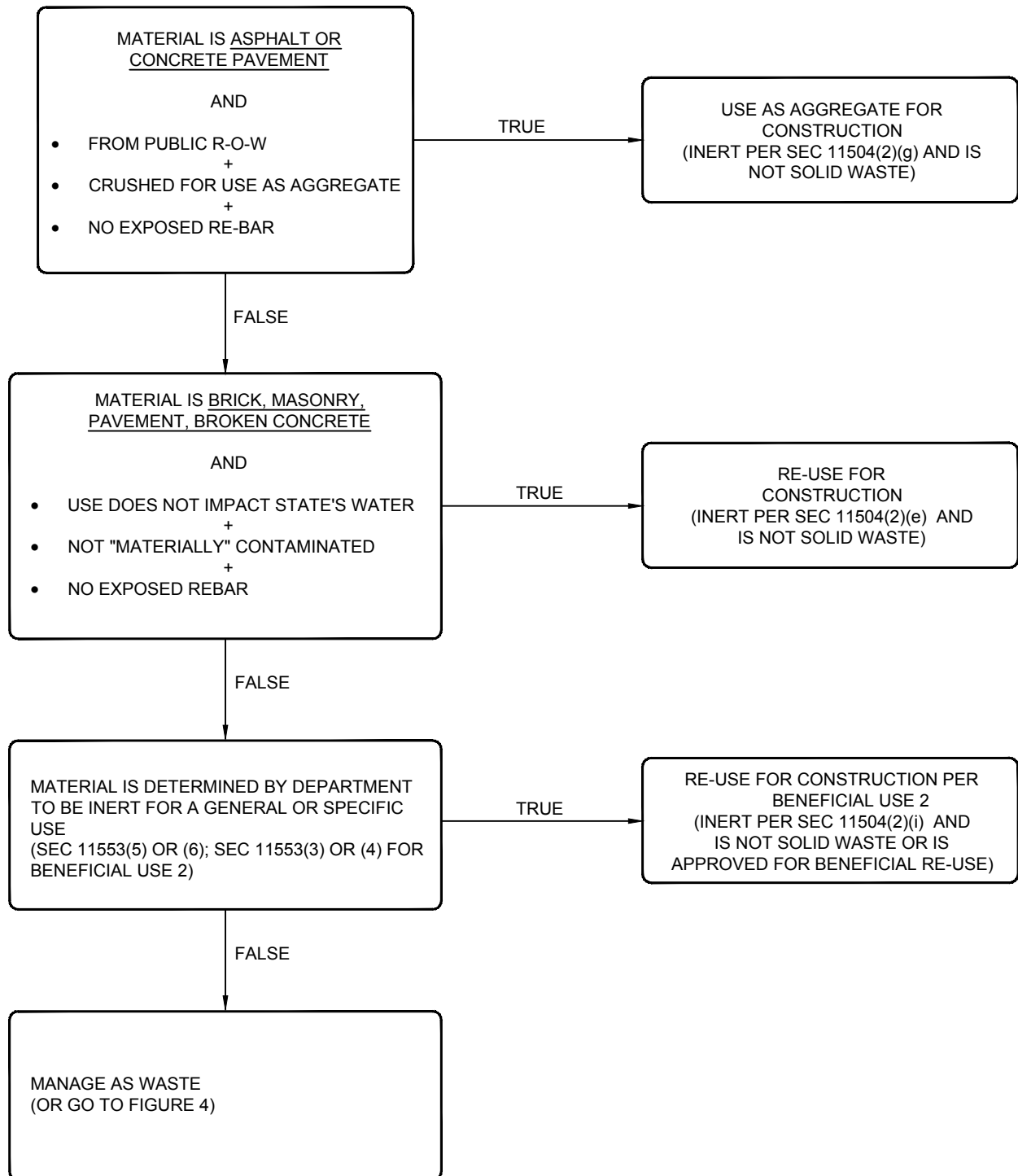


FORMER WILLOW RUN POWERTRAIN
REDEVELOPMENT AREA
YPSILANTY, MICHIGAN
EXCAVATED MATERIALS
MANAGEMENT PLAN

017358-T02
Mar 22, 2017

FIGURE 2

EXCAVATED PAVEMENT MANAGEMENT

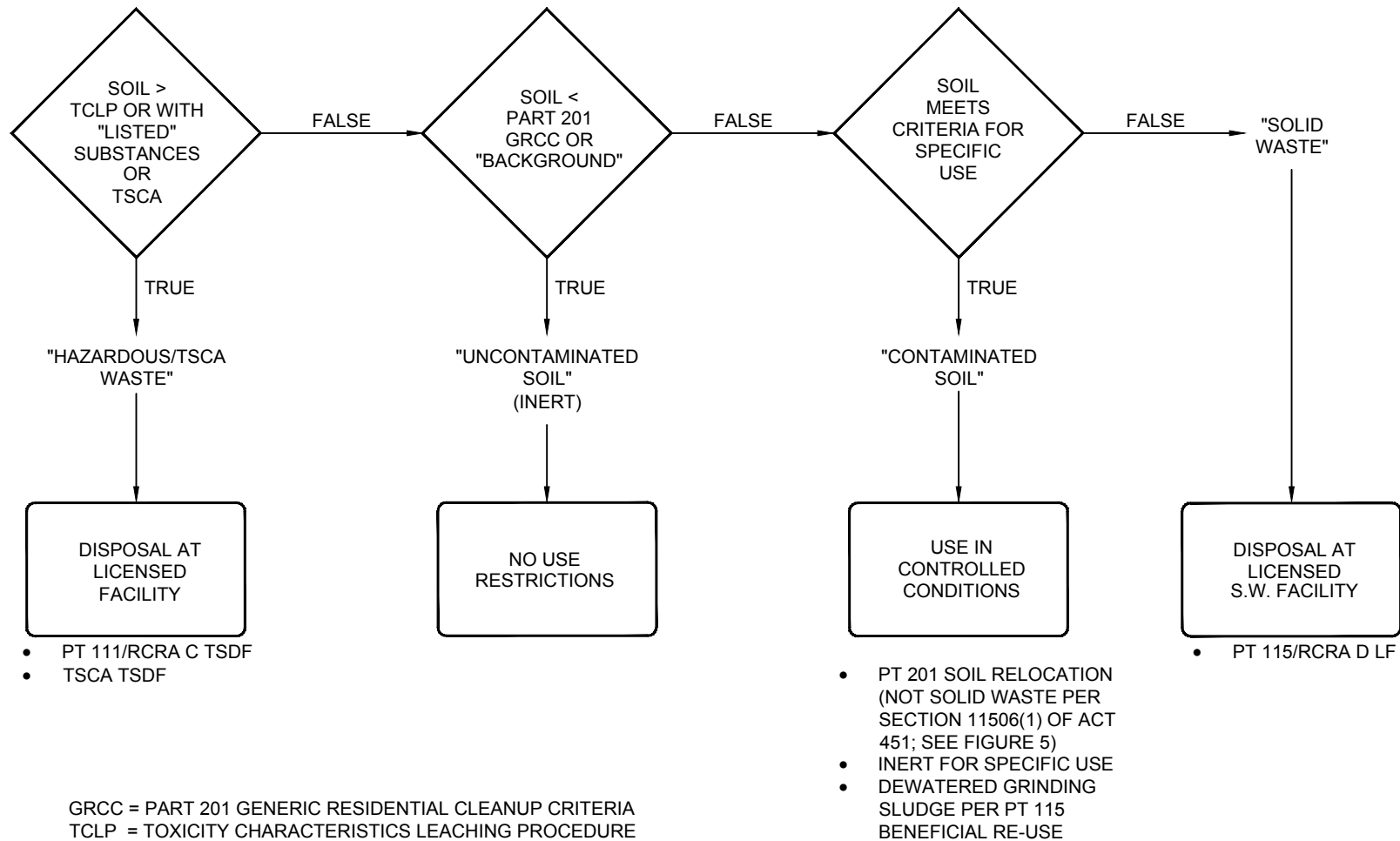


FORMER WILLOW RUN POWERTRAIN
REDEVELOPMENT AREA
YPSILANTI, MICHIGAN
EXCAVATED MATERIALS
MANAGEMENT PLAN

017358-T02
May 3, 2017

FIGURE 3

OPTIONS FOR SOIL MANAGEMENT
BASED ON CONSTITUENT CHARACTERISTICS



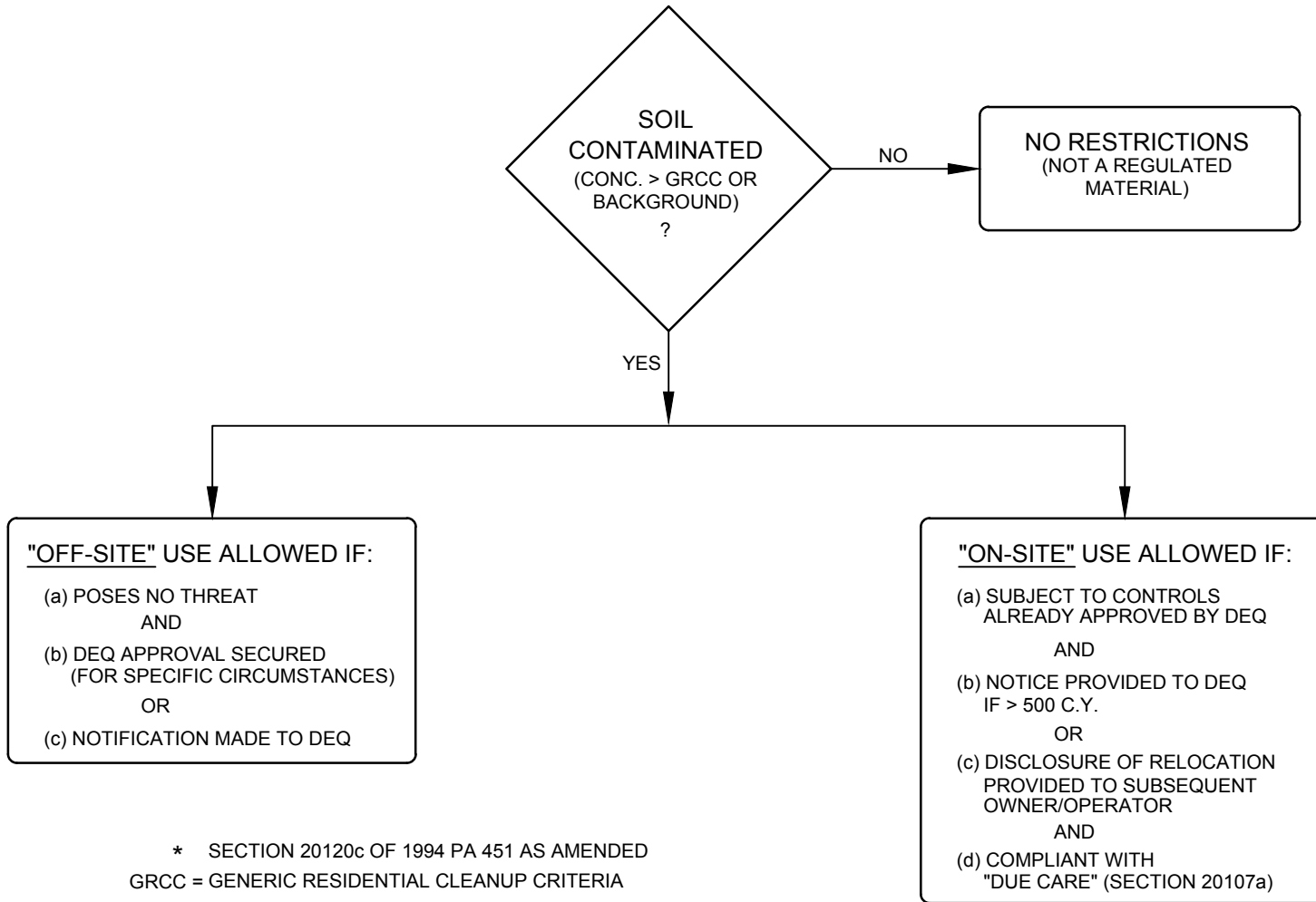
FORMER WILLOW RUN POWERTRAIN REDEVELOPMENT AREA
YPSILANTI, MICHIGAN

EXCAVATED MATERIALS MANAGEMENT PLAN

017358-T02
May 17, 2017

FIGURE 4

SUMMARY
PART 201 SOIL RELOCATION REGULATIONS*

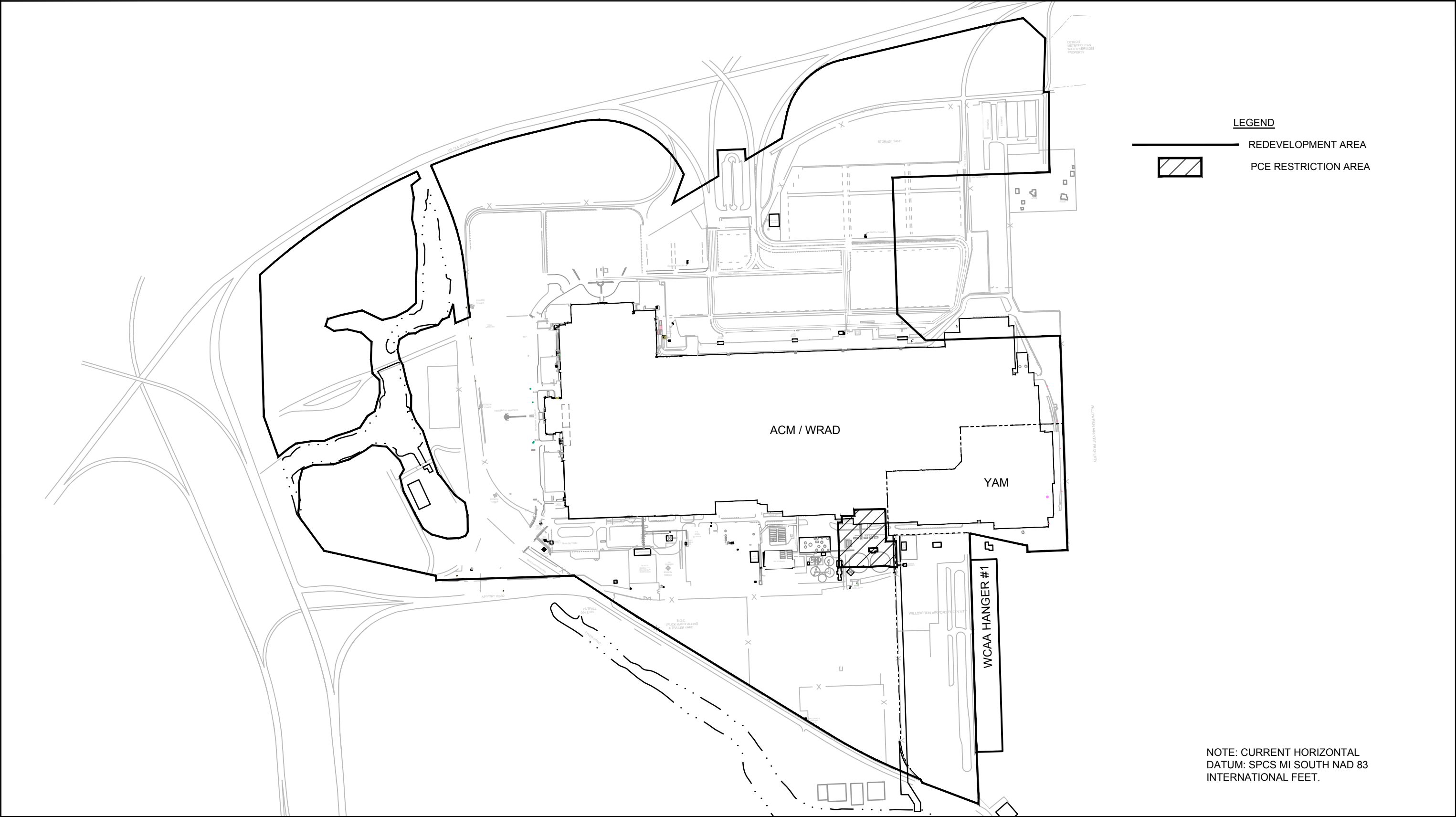


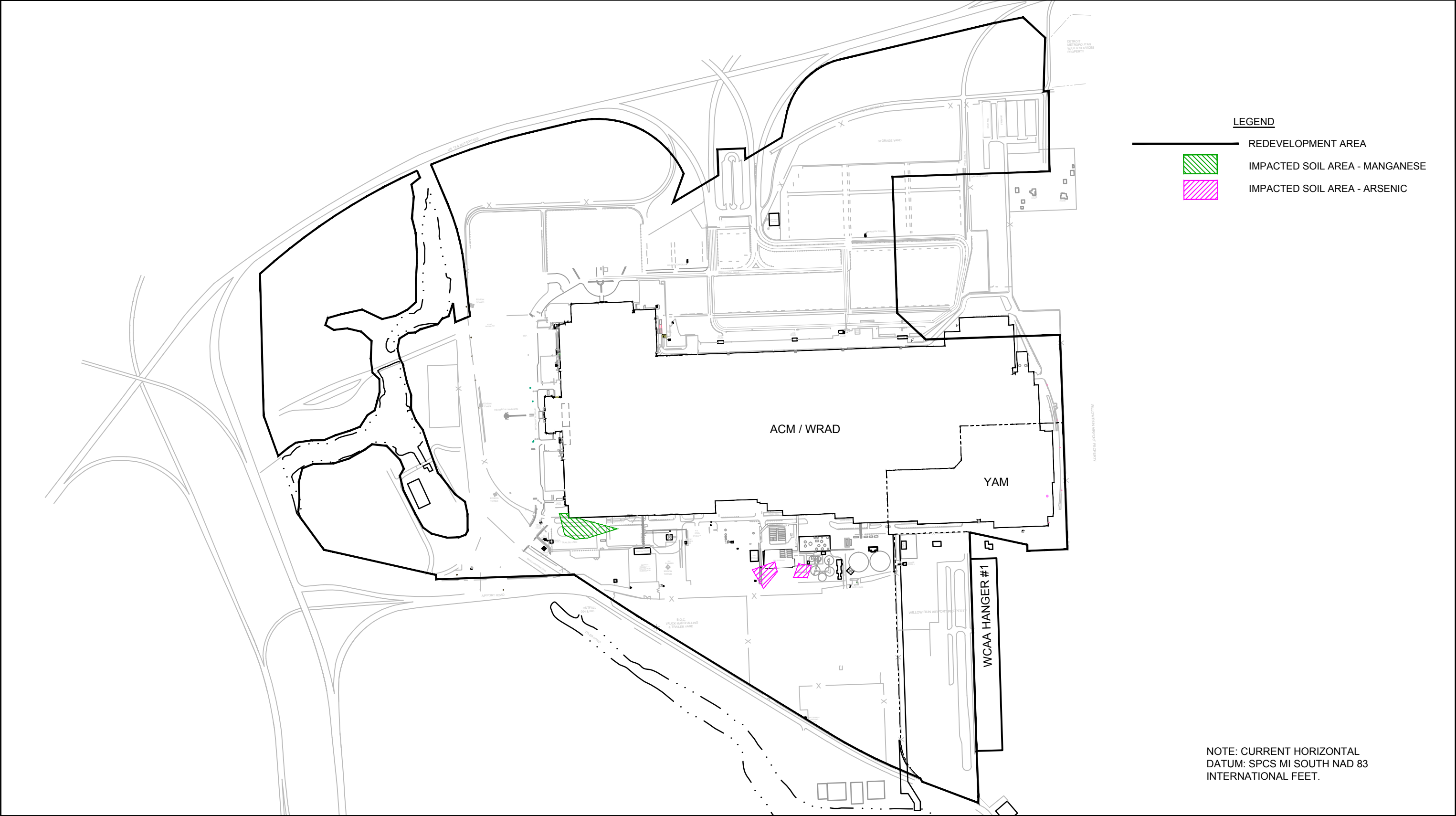
FORMER WILLOW RUN POWERTRAIN REDEVELOPMENT AREA
YPSILANTI, MICHIGAN

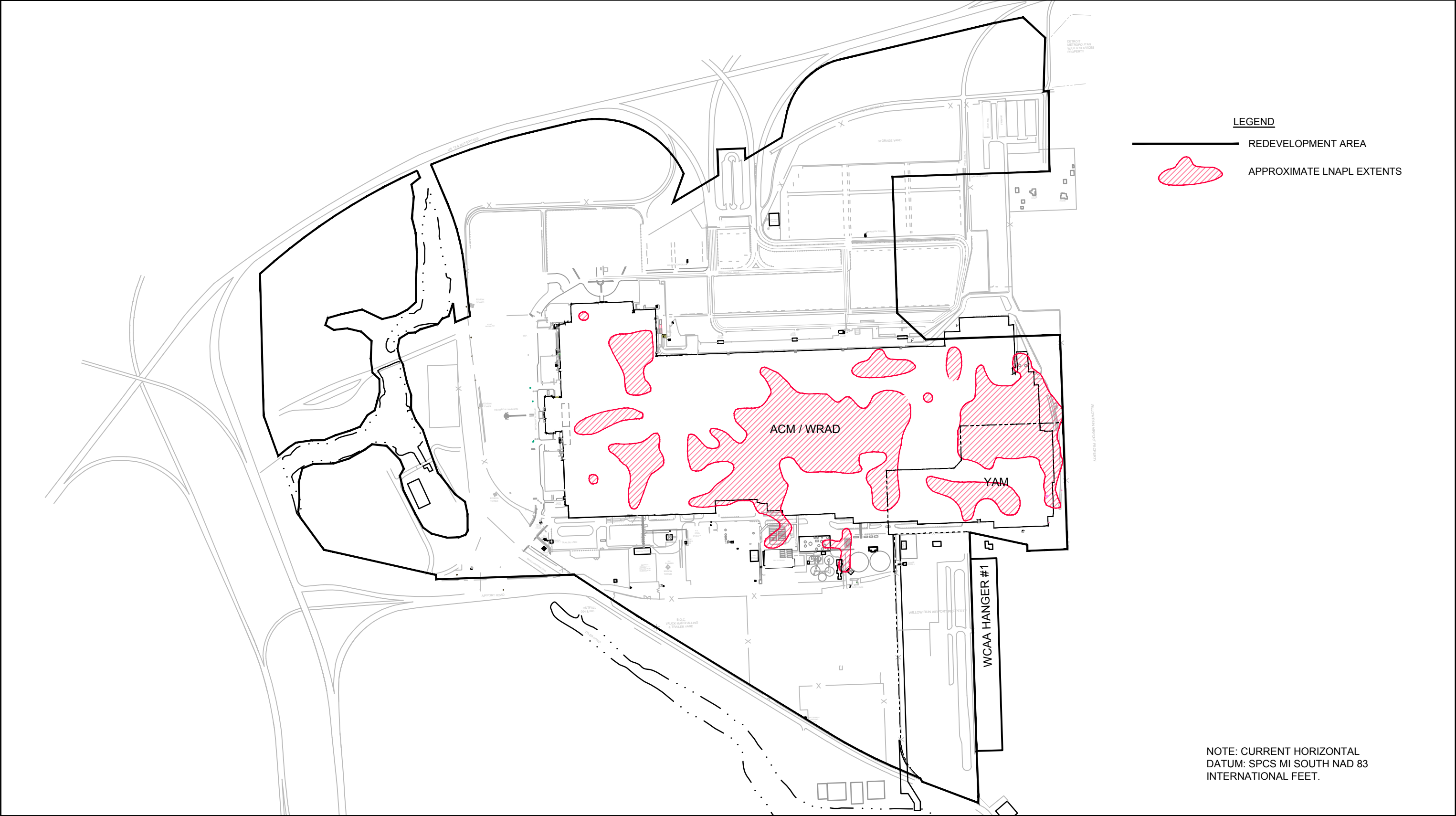
EXCAVATED MATERIALS MANAGEMENT PLAN

017358-T02
May 3, 2017

FIGURE 5







0 300 600ft



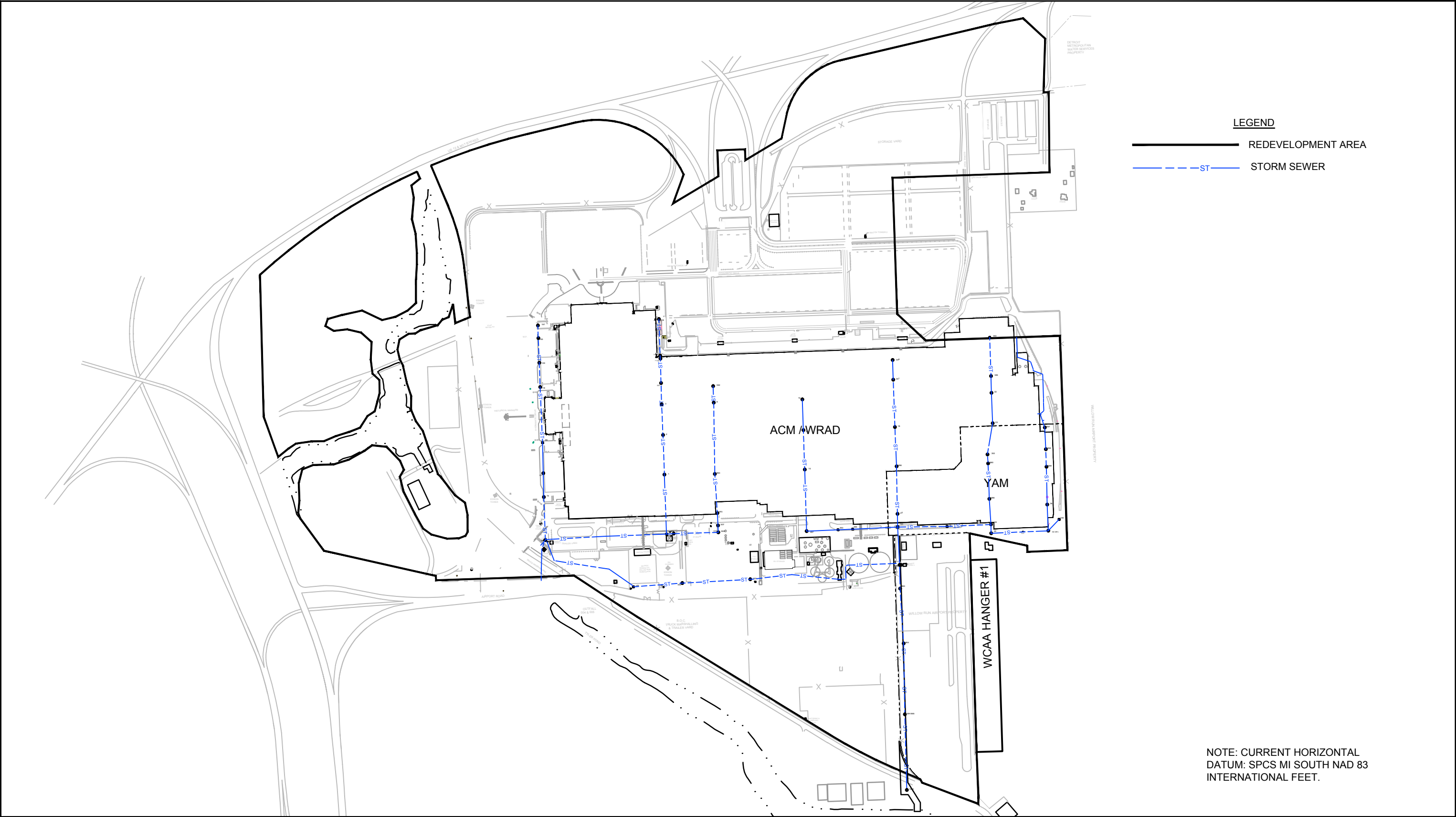
FORMER WILLOW RUN POWERTRAIN REDEVELOPMENT AREA
YPSILANTI, MICHIGAN

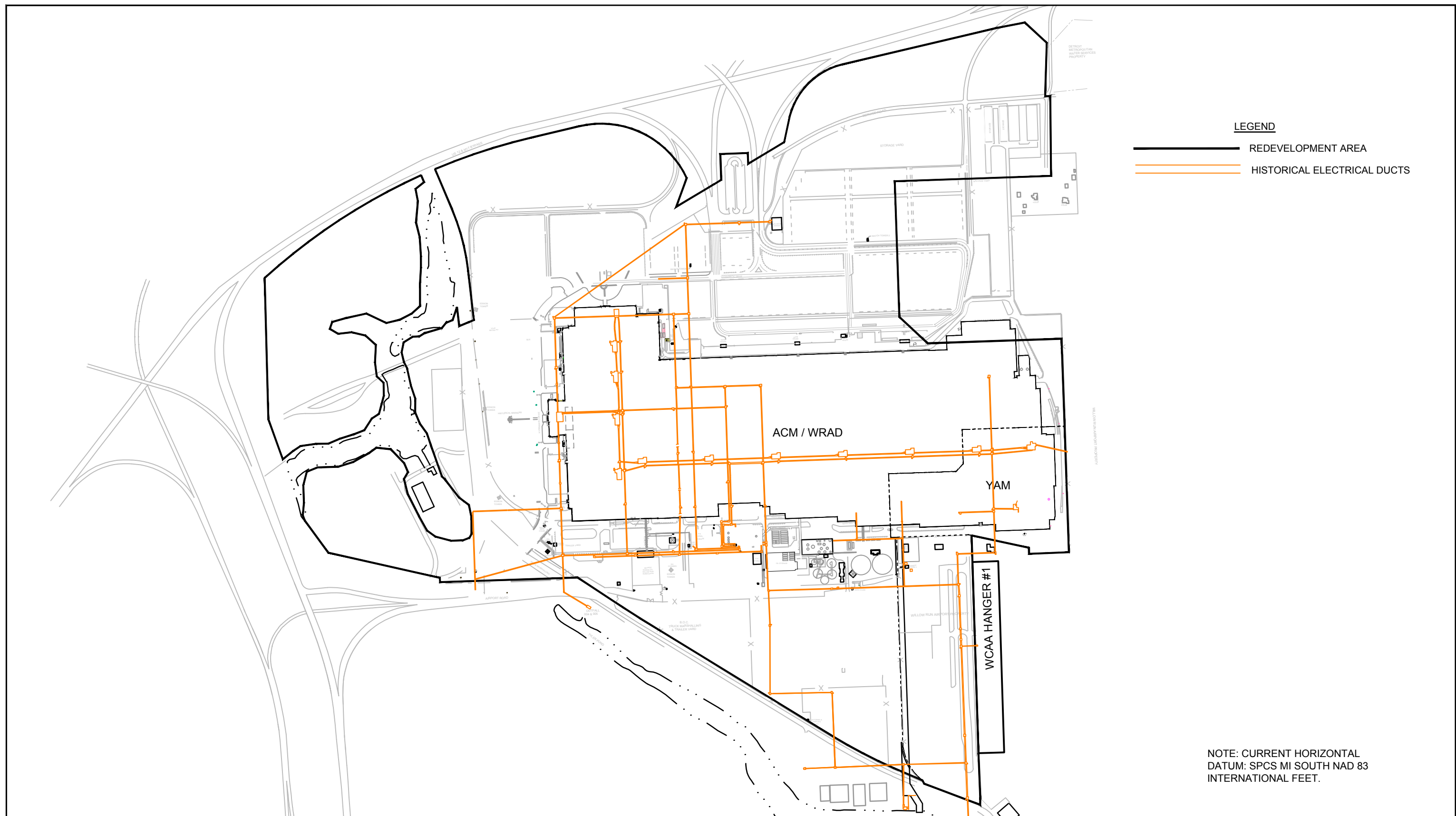
LNAPL AREAS
EXCAVATED MATERIALS MANAGEMENT PLAN

017358-T02

May 3, 2017

FIGURE 8





0 300 600ft



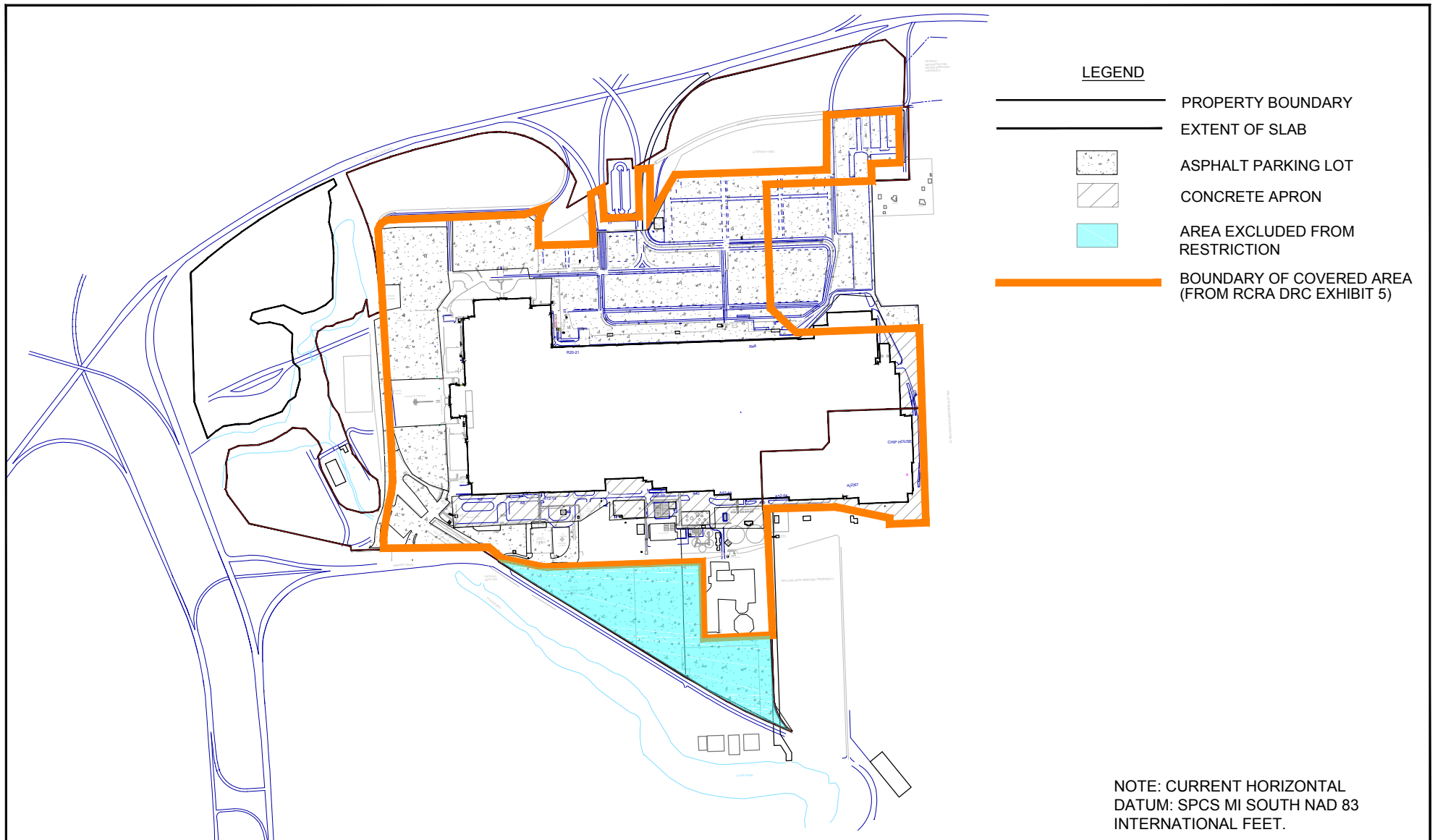
FORMER WILLOW RUN POWERTRAIN REDEVELOPMENT AREA
YPSILANTI, MICHIGAN

HISTORICAL ELECTRICAL DUCTS
EXCAVATED MATERIALS MANAGEMENT PLAN

017358-T02

May 3, 2017

FIGURE 10



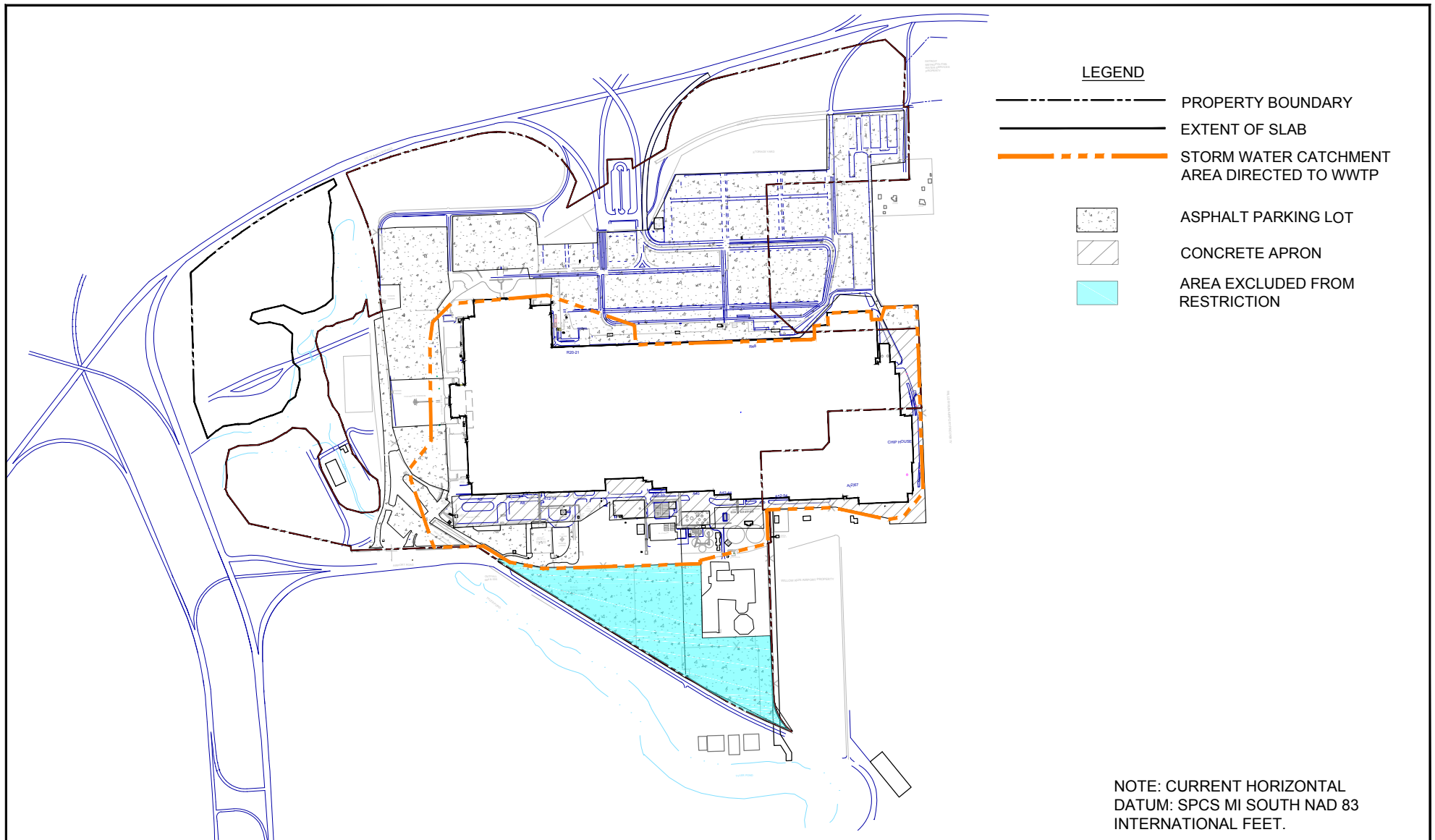
0 500 1000ft



FORMER POWERTRAIN PLANT
YPSILANTI, MICHIGAN
**BOUNDARY OF COVERED AREA
EXCAVATED MATERIALS MANAGMENT PLAN**

017358-T02
May 3, 2017

FIGURE 11



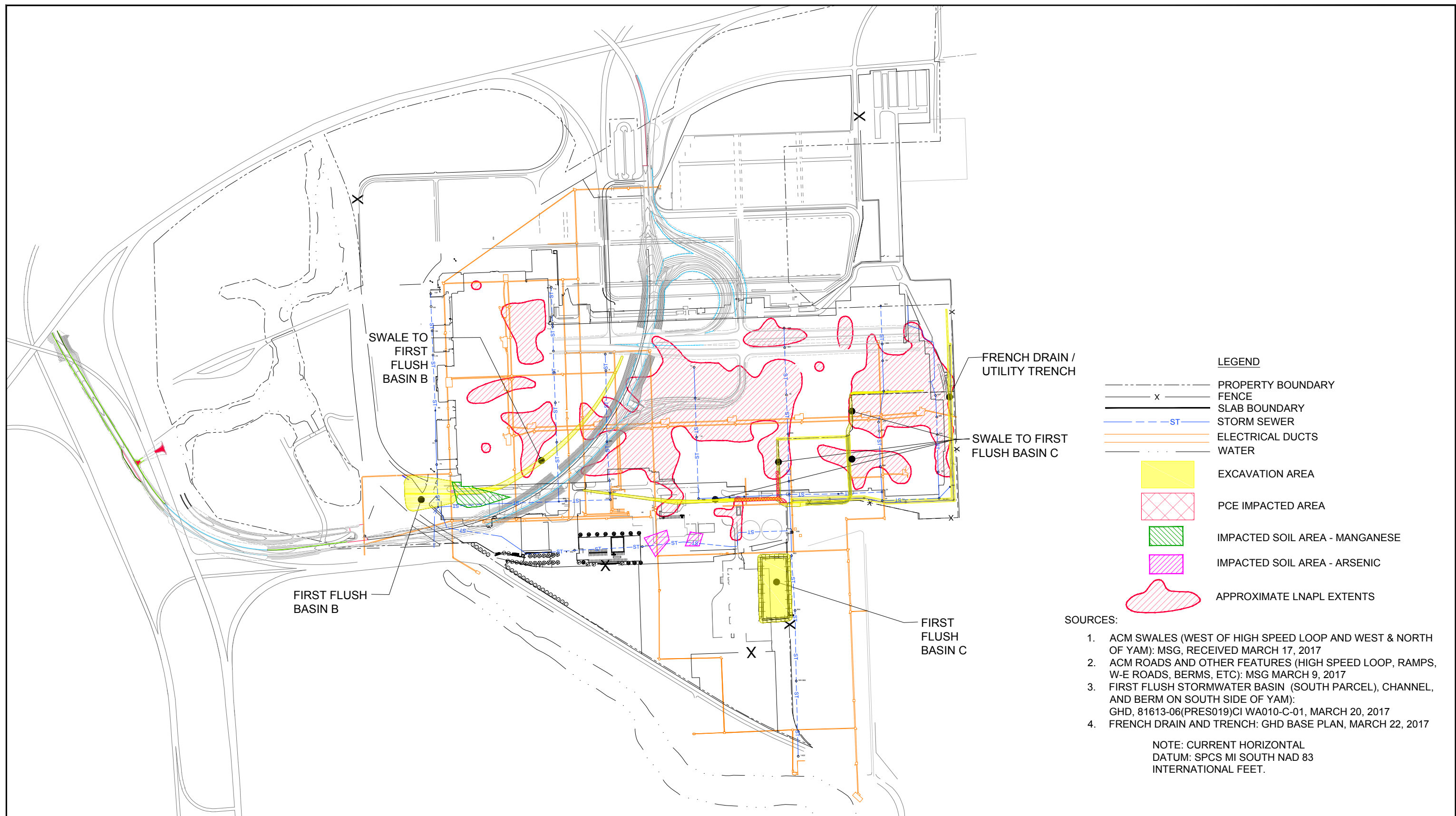
0 500 1000ft



FORMER POWERTRAIN PLANT
YPSILANTI, MICHIGAN
STORMWATER CATCHMENT AREA
EXCAVATED MATERIALS MANAGEMENT PLAN

017358-T02
May 3, 2017

FIGURE 12



0 300 600ft



FORMER WILLOW RUN POWERTRAIN REDEVELOPMENT AREA
YPSILANTI, MICHIGAN

EXCAVATION AREAS
EXCAVATED MATERIALS MANAGEMENT PLAN

017358-T02
May 30, 2017

FIGURE 13

Table

Table 1

**Summary of Materials to be Removed From Excavation Areas
Excavated Materials Management Plan
Former Willow Run Powertrain Redevelopment Area**

<u>Ref #</u>	<u>Appendix</u>	<u>Excavation Area</u>	<u>Est Pave (cu yd)</u>	<u>Est Soil (cu yd)</u>	<u>Est Tot Vol (cu yd)</u>	<u>Targeted Management Area(s)*</u>
1	H	First Flush Basin - B	1,600	13,600	15,200	Covered Area*
2	E	Swale to FFB-B	975	3,400	4,375	Covered Area*
3	F	First Flush Basin - C	4,700	22,100	26,800	Covered Area*
4	G	Swale & Drainageway to FFB-C	1,800	4,600	6,400	PCE Soil Off-Site Facility; Other to Covered Area*
5	I	French Drain/Utility Trench	1,000	6,200	7,200	Covered Area*

* For "Qualifying Material" : material that is not hazardous waste or containing LNAPL

Appendices

Appendix A

RCRA Restrictive Covenant

DECLARATION OF RESTRICTIVE COVENANT

By RACER Properties LLC

MDEQ Reference Number: WMRP – 111-16-____

Facility MID Number: MID 980 587 893

MDEQ Approval Date: ____ - 2016

2930 Ecorse Road

November 24, 2016

First American Title

725930

75

DECLARATION OF RESTRICTIVE COVENANT

By RACER Properties LLC

MDEQ Reference Number: *WMRP* – 111-16-____

Facility MID Number: MID 980 587 893

MDEQ Approval Date: ____ - 2016

2930 Ecorse Road

November 24, 2016

725930

DECLARATION OF RESTRICTIVE COVENANT

MDEQ Reference Number: *WMRP – 111-16-___*

Facility MID Number: MID 980 587 893

MDEQ Approval Date: ___ - 2016

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 November 4, 2016, by RACER Properties LLC, the Grantor, an entity wholly owned by the Revitalizing Auto Communities Environmental Response Trust (“**Trust**”) and the current fee title holder of the Property, such Property legally described in Exhibit 1 and depicted in Exhibit 2, the location of which is located at 2930 Ecorse Road in the Townships of Ypsilanti and Van Buren, Washtenaw and Wayne Counties, respectively, State of Michigan (“Property” or “Site”), 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 48909-7973 (“**Grantee**”).

This Restrictive Covenant has been made to prohibit or restrict activities that could result in unacceptable exposure to environmental contamination present at the Property. 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 MDEQ 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 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.

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. MDEQ recommends 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.

Definitions

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

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

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

"Settlement Agreement" shall mean the Environmental Response Trust Consent Decree and 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).

"USEPA" will 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, will have the same meaning in this document as in those statutes and rules as on the date this Restrictive Covenant is made.

Summary of Response Activity/Corrective Measures

The Site was originally developed in the 1940's as a bomber production plant. Over its long history (through 2010), the plant was used for various manufacturing operations. Environmental investigations at the Site have included the review of historical information and investigation of potential areas of impacts based on historical operations and overall plant coverage. A significant portion of the area beneath the former plant building footprint is impacted with Light Non-aqueous Phase Liquid (LNAPL) (~40 acres of the 80 acre slab). The LNAPL body is stable/non-migrating and mostly consists of unrecoverable residual oils including cutting oils, transmission fluids and lubricating oils. There are some localized areas of elevated levels of metals and chlorinated volatile organic compounds in soils and/or groundwater south of the former plant building that were identified during investigations. Restrictions to prevent disturbance or exposure to these areas are included in this Declaration. Contaminants are present above drinking water and GSI criteria in groundwater in various areas of the Site. As a corrective measure, a groundwater collection and treatment system designed to mitigate potential offsite migration of impacted groundwater has been proposed.

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, will be subject to those restrictions on use described below, and intends that said restrictions and covenants will 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; and (2) MDEQ.

1. Land Use Prohibitions. The Owner will prohibit all uses of the Property that are not compatible or consistent with the exposure assumptions for the nonresidential cleanup criteria under MCL 324.20120a(1)(b). Uses that are compatible with nonresidential cleanup criteria are generally described in the Description of Allowable Uses, attached hereto as Exhibit 3. Nonresidential Environmental Protection Standards are established under Part 201 of NREPA at MCL 324.20120 et seq. and the administrative rules under Part 111 of NREPA found at MAC 299.9629.
2. General Activities Prohibited. Owner will prohibit activities on the Property that may result in exposures above the nonresidential cleanup criteria. In the event of a conflict the specific prohibitions in paragraph 3 below control over these general prohibitions. The generally 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 approved response activity or corrective measure, 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. Except groundwater may be used for non-potable purposes if approved by the Trust and MDEQ in writing.*
 - c. *The Owner will not remove, disturb, interfere with, or damage any monitoring wells or soil gas ports on the Property without MDEQ approval.*
 - d. *Owner will 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 equivalent State Law, except pursuant to a plan or permit approved in writing by MDEQ.*
 - e. *No buildings or structures may be constructed on the Property unless the Owner has considered the potential for vapor intrusion, if any, and has taken steps to address such potential, if necessary, as may be required by the MDEQ.*
 - f. *The Owner will manage contaminated soils, media and/or debris and all other soils located on the Property whether encountered on the surface or during below grade work 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/media/debris management also applies in the event that the Owner elects to remove any slabs, pavement, or other impervious surface on the Property.*
3. Specific Activities Prohibited. Owner will prohibit the following specific activities on the Property that may result in exposures above the nonresidential cleanup criteria or otherwise disrupt, damage, interfere with or render less effective the applicable remedial measures. These prohibited activities include:
- a. *The Owner will not remove, disturb, interfere with, or damage any monitoring wells or soil gas ports if any, on the Property where located and as identified on the attached Exhibit 4 without written approval from the Trust and MDEQ. Owner will repair, relocate or replace as necessary any monitoring wells or soil gas ports damaged or destroyed by Owner.*

- b. *The Owner will not remove alter or disturb the slab, concrete apron or parking lot, roadways and pedestrian areas (in variable states of maintenance/degradation) on the Property where located and as identified on the attached Exhibit 5 without written approval from the Trust and MDEQ in accordance with technical specifications that may be established as a condition of such approval. Owner will perform any such removal, alteration or disturbance, 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. Trust shall not be responsible for any and all obligations under environmental laws arising from any such removal, alteration or disturbance by Owner.*
- c. *The Owner will not remove, destroy, alter, block, interfere with or prevent access to the existing storm sewer network beneath and in the vicinity of the primary manufacturing building footprint/slab area as identified and located on the attached Exhibit 6, including the designated manhole locations, without written approval from the Trust and MDEQ and in accordance with technical specifications that may be established as a condition of such approval.*
- d. *The Owner will not remove, disturb, penetrate, relocate, destroy or disturb the underground groundwater collection system including pre-existing storm sewer lines and french drain lines and their respective aboveground appurtenances as identified and located on the attached Exhibit 7 without written approval from the Trust and MDEQ and in accordance with technical specifications that may be established as a condition of such approval.*
- e. *The Owner will not disturb, remove or dig beneath the cover placed on those areas designated in Exhibit 8 and 9 to prevent exposure to soils containing elevated levels of manganese and arsenic, without written approval from the Trust and MDEQ and in accordance with technical specifications that may be established as a condition of such approval.*
- f. *The Owner will not disturb, remove or dig beneath the cover placed on those areas designated in Exhibit 10 to prevent exposure to soils containing elevated levels of volatile organic chemicals including perchloroethylene, without written approval from the Trust and MDEQ and in accordance with technical specifications that may be established as a condition of such approval.*
- g. *The Owner will not remove, disturb, or penetrate the former underground electrical duct system as identified on the attached Exhibit 11 to prevent the disturbance of any contamination including non-TSCA regulated PCBs, without written approval from the Trust and MDEQ and in accordance with technical specifications that may be established as a condition of such approval.*

4. Compliance with this Restrictive Covenant and Applicable Due Care Obligations. The Owner will at all times comply with the conditions and restrictions of this Restrictive Covenant and the applicable due care obligations under Section 20107a of NREPA and CERCLA, 42 U.S.C. § 9601 *et seq.* Owner agrees to maintain records of its applicable due care activities to the extent required by Section 20107a, and make copies of any such records available upon reasonable request from Grantor or the MDEQ.
5. Access. The Owner grants to the Trust and the MDEQ 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. Where a request for access includes accessing areas where proprietary activities and operations are occurring, both the Owner and any affected tenant must consent to the request, which consent may not be unreasonably withheld, conditioned or delayed. Nothing herein shall be construed as limiting or restricting, in any manner, the Trust's and MDEQ's access rights under any Environmental Easement Agreement recorded subsequent hereto.
6. Transfer of Interest. The Grantor will provide notice at the addresses provided in this document to MDEQ 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 will 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 will 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 WASHTENAW AND WAYNE COUNTY REGISTER OF DEEDS, LIBER _____, PAGE _____ and LIBER _____, PAGE _____ RESPECTIVELY.

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. Approvals; Notices. Any approval that is required to be made by, or obtained from, the Grantor, Trust or the Owner or any affected tenant under this Restrictive Covenant will not be unreasonably withheld by the Grantor, Trust or the Owner or any affected tenant. If a dispute over any such approval occurs, the MDEQ shall make the final approval decision.

Any notice, demand, request, consent, approval, or communication that is required to be made or obtained under this Restrictive Covenant will be made in writing; include a statement that the notice is being made pursuant to the requirements of this Restrictive Covenant; include the MDEQ Reference Number _____, the Facility MID Number _____; and will be served either personally, or sent via first class mail, postage prepaid, as follows:

For MDEQ:

Chief, Remediation and Redevelopment Division
Michigan Department of Environmental Quality
P.O. Box 30241
Lansing, MI 48909-7741

For RACER Trust:

Michigan Cleanup Manager
RACER Trust
500 Woodward, Suite 2650
Detroit, MI. 48226

8. Term. This Restrictive Covenant will run with the Property, and will 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.
9. Enforcement. Grantor and/or the Trust 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 is 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 will be in addition to any and all other remedies at law or equity.
10. 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.
11. Modification/ Release/Rescission. Grantor will request and seek MDEQ agreement to the rescission of all prior Environmental Restrictive Covenants placed on the Property (except for the TSCA Restrictive Covenant filed on _____, 2016), including without limitation: _____. Grantor or Owner may request in writing to MDEQ and the Trust 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 and the Trust. Any approved modification to, or release or rescission of, this Restrictive Covenant will be filed with the appropriate Registrar of Deeds by the Grantor or Owner and a certified copy will be returned to MDEQ at the addresses provided herein.

12. Severability. If any provision of this Restrictive Covenant is held to be invalid by a court of competent jurisdiction, the invalidity of such provision will not affect the validity of any other provisions of this Restrictive Covenant and all other provisions will continue to remain in full force and effect.
13. Settlement Agreement and Law. Nothing herein shall be construed as altering or in any way affecting the liability or obligations of the Trust, RACER Properties LLC, and/or the Administrative Trustee under the Settlement Agreement or under applicable law.
14. 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.
15. Miscellaneous.
 - a) Controlling Law. The interpretation and performance of this Restrictive Covenant will be governed by the laws of the United States as to the obligations referred to in the Settlement Agreement and the laws 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, Part 201 or Part 211 of the NREPA.
 - b) Liberal Construction. Any general rule of construction to the contrary notwithstanding, this Restrictive Covenant will 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 will 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, MDEQ Reference Number _____, to be executed on this 4th day of November, 2016.

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

DISTRICT/STATE OF Michigan
CITY/COUNTY OF Wayne

The foregoing instrument was acknowledged before me this 4th day of November, 2016, 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.

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

Tracie L. Nichols
Notary Public Signature

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:
Dawda, Mann, Mulcahy & Sadler, PLC
Dawda Mann Building
39533 Woodward Avenue, Suite 200
Bloomfield Hills, Michigan 48304
Attn: Edward C. Dawda
Ref # 11991 & 11992

**LIST OF EXHIBITS
RCRA DRC**

Exhibit 1	Legal Description of Property
Exhibit 2	Survey of Property
Exhibit 3	Description of Allowable Uses
Exhibit 4, 4a-f	Monitoring Well Locations
Exhibit 5, 5a-f	Location and Boundary of Ground Cover
Exhibit 6, 6a-d	Storm Sewer Areas
Exhibit 7, 7a-b	Groundwater Management System
Exhibit 8, 8a-c	Manganese Contaminated Soils
Exhibit 9, 9a-c	Arsenic Contaminated Soils
Exhibit 10, 10a-c	PCE Contaminated Soils
Exhibit 11, 11a-f	Former Electrical Duct System

EXHIBIT 1

LEGAL DESCRIPTION OF PROPERTY

FIRST AMERICAN TITLE INSURANCE COMPANY COMMITMENT FILE NO. 725930, PRINTED OCTOBER 18, 2016, REVISION J - SCHEDULE C:

LAND REFERRED TO IN THIS COMMITMENT, SITUATED IN THE COUNTY OF WAYNE, TOWNSHIP OF VAN BRUEN, STATE OF MICHIGAN, IS DESCRIBED AS FOLLOWS:

PARCEL 1:

THAT PART OF NORTHWEST 1/4 OF SECTION 7, TOWN 3 SOUTH, RANGE 8 EAST, VAN BUREN TOWNSHIP, WAYNE COUNTY, MICHIGAN, DESCRIBED AS: BEGINNING AT THE NORTHWEST CORNER OF SECTION 7 AND PROCEEDING SOUTH 01 DEGREE 25 MINUTES 10 SECONDS WEST ALONG THE WEST SECTION LINE 799.13 FEET; THENCE NORTH 89 DEGREES 57 MINUTES 40 SECONDS EAST 193.19 FEET; THENCE NORTH 00 DEGREES 02 MINUTES 20 SECONDS WEST 275.00 FEET; THENCE SOUTH 89 DEGREES 57 MINUTES 40 SECONDS WEST 153.16 FEET; THENCE NORTH 01 DEGREE 25 MINUTES 10 SECONDS EAST 525.40 FEET; THENCE SOUTH 87 DEGREES 34 MINUTES 10 SECONDS WEST ALONG THE NORTH SECTION LINE 33.07 FEET TO THE POINT OF BEGINNING.

EXCEPT:

PART OF THE NORTHWEST 1/4 OF SECTION 7, TOWN 3 SOUTH, RANGE 8 EAST, VAN BUREN TOWNSHIP, WAYNE COUNTY, MICHIGAN AND BEING MORE PARTICULARLY DESCRIBED AS FOLLOWS: COMMENCING AT THE NORTHEAST CORNER OF SECTION 12, TOWN 3 SOUTH, RANGE 7 EAST, YPSILANTI TOWNSHIP, WASHTENAW COUNTY, MICHIGAN; RUNNING THENCE SOUTH 01 DEGREE 27 MINUTES 26 SECONDS WEST ALONG THE EAST LINE OF SAID SECTION 12, A DISTANCE OF 33.00 FEET TO THE NORTHWEST CORNER OF SECTION 7, TOWN 3 SOUTH, RANGE 8 EAST, VAN BUREN TOWNSHIP, WAYNE COUNTY, MICHIGAN; THENCE NORTH 87 DEGREES 37 MINUTES 30 SECONDS EAST, ALONG THE NORTH LINE OF SAID SECTION 7, A DISTANCE OF 33.07 FEET TO A POINT; THENCE SOUTH 01 DEGREE 27 MINUTES 26 SECONDS WEST A DISTANCE OF 525.40 FEET TO THE POINT OF BEGINNING OF THE PARCEL OF LAND HEREIN BEING DESCRIBED; PROCEEDING THENCE FROM SAID POINT OF BEGINNING NORTH 89 DEGREES 59 MINUTES 56 SECONDS EAST A DISTANCE OF 153.16 FEET TO A POINT; THENCE SOUTH 00 DEGREES 00 MINUTES 04 SECONDS WEST A DISTANCE OF 275.00 FEET TO A POINT; THENCE SOUTH 89 DEGREES 59 MINUTES 56 SECONDS WEST A DISTANCE OF 193.17 FEET TO A POINT ON THE WEST LINE OF SAID SECTION 7; THENCE NORTH 01 DEGREE 27 MINUTES 26 SECONDS EAST ALONG THE WEST LINE OF SAID SECTION 7, A DISTANCE OF 275.10 FEET TO A POINT; THENCE SOUTH 89 DEGREES 58 MINUTES 35 SECONDS EAST A DISTANCE OF 33.01 FEET TO THE POINT OF BEGINNING.

PARCEL 2:

PART OF THE WEST 1/2 OF SECTION 7, TOWN 3 SOUTH, RANGE 8 EAST, VAN BUREN TOWNSHIP, WAYNE COUNTY, MICHIGAN, DESCRIBED AS: BEGINNING AT THE WEST 1/4 CORNER OF SECTION 7; THENCE NORTH 01 DEGREE 27 MINUTES 26 SECONDS EAST 855.18 FEET; THENCE SOUTH 24 DEGREES 17 MINUTES 05 SECONDS EAST 238.53 FEET; THENCE DUE SOUTH 768.31 FEET; THENCE SOUTH 41 DEGREES 23 MINUTES 40 SECONDS WEST 181.57 FEET; THENCE NORTH 00 DEGREES 02 MINUTES 43 SECONDS EAST 267.04 FEET TO THE PLACE OF BEGINNING.

ALSO:

PART OF THE NORTHWEST 1/4 OF SECTION 7, TOWN 3 SOUTH, RANGE 8 EAST, VAN BUREN TOWNSHIP, WAYNE COUNTY, MICHIGAN AND BEING MORE PARTICULARLY DESCRIBED AS FOLLOWS: COMMENCING AT THE NORTHEAST CORNER OF SECTION 12, TOWN 3 SOUTH, RANGE 7 EAST, YPSILANTI TOWNSHIP, WASHTENAW COUNTY, MICHIGAN; RUNNING THENCE SOUTH 01 DEGREE 27 MINUTES 26 SECONDS WEST ALONG THE EAST LINE OF SAID SECTION 12, A DISTANCE OF 33.00 FEET TO THE NORTHWEST CORNER OF SECTION 7, TOWN 3 SOUTH, RANGE 8 EAST, VAN BUREN TOWNSHIP, WAYNE COUNTY, MICHIGAN; THENCE NORTH 87 DEGREES 37 MINUTES 30 SECONDS EAST ALONG THE NORTH LINE OF SAID SECTION 7, A DISTANCE OF 33.07 FEET TO A POINT; THENCE SOUTH 01 DEGREE 27 MINUTES 26 SECONDS WEST A DISTANCE OF 525.40 FEET TO A POINT; THENCE NORTH 89 DEGREES 59 MINUTES 56 SECONDS EAST A DISTANCE OF 153.16 FEET TO A POINT; THENCE SOUTH 00 DEGREES 00 MINUTES 04 SECONDS WEST A DISTANCE OF 275.00 FEET TO A POINT; THENCE SOUTH 89 DEGREES 59 MINUTES 56 SECONDS WEST, ACROSS THE LINE COMMON TO SAID SECTIONS 7 AND 12 AND INTO SAID SECTION 12, A DISTANCE OF 425.10 FEET TO A POINT; THENCE SOUTH 00 DEGREES 00 MINUTES 35 SECONDS WEST

A DISTANCE OF 534.67 FEET TO A POINT; THENCE SOUTH 24 DEGREES 17 MINUTES 05 SECONDS EAST A DISTANCE OF 287.53 FEET TO A POINT; THENCE SOUTH 89 DEGREES 58 MINUTES 35 SECONDS EAST A DISTANCE OF 93.51 FEET TO A POINT ON THE WEST LINE OF SAID SECTION 7, SAID POINT BEING THE POINT OF BEGINNING OF THE PARCEL OF LAND HEREIN BEING DESCRIBED; PROCEEDING THENCE FROM SAID POINT OF BEGINNING SOUTH 89 DEGREES 58 MINUTES 35 SECONDS EAST A DISTANCE OF 93.07 FEET TO A POINT; THENCE SOUTH A DISTANCE OF 413.48 FEET TO A POINT; THENCE NORTH 24 DEGREES 17 MINUTES 05 SECONDS WEST A DISTANCE OF 238.46 FEET TO A POINT ON THE WEST LINE OF SAID SECTION 7; THENCE NORTH 01 DEGREE 27 MINUTES 26 SECONDS EAST ALONG THE WEST LINE OF SAID SECTION 7, A DISTANCE OF 196.22 FEET TO THE POINT OF BEGINNING.

EXCEPT THAT PART OF THE FOLLOWING DESCRIPTION LYING WITHIN ABOVE PARCEL 2:

PART OF THE WEST 1/2 OF SECTION 7, TOWN 3 SOUTH, RANGE 8 EAST, VAN BUREN TOWNSHIP, WAYNE COUNTY, MICHIGAN AND BEING MORE PARTICULARLY DESCRIBED AS FOLLOWS: BEGINNING AT THE WEST 1/4 CORNER OF SECTION 7, TOWN 3 SOUTH, RANGE 8 EAST, VAN BUREN TOWNSHIP, WAYNE COUNTY, MICHIGAN AND PROCEEDING THENCE FROM SAID POINT OF BEGINNING NORTH 01 DEGREE 27 MINUTES 26 SECONDS EAST, ALONG THE WEST LINE OF SAID SECTION 7, A DISTANCE OF 477.35 FEET TO A POINT; THENCE SOUTH 89 DEGREES 58 MINUTES 00 SECONDS EAST A DISTANCE OF 107.72 FEET TO A POINT; THENCE DUE SOUTH A DISTANCE OF 829.09 FEET TO A POINT; THENCE SOUTH 89 DEGREES 42 MINUTES 46 SECONDS WEST A DISTANCE OF 120.09 FEET TO A POINT ON THE WEST LINE OF SAID SECTION 7; THENCE NORTH 00 DEGREES 02 MINUTES 43 SECONDS EAST A DISTANCE OF 352.56 FEET TO THE POINT OF BEGINNING.

LAND IN THE COUNTY OF WASHTENAW, TOWNSHIP OF YPSILANTI, STATE OF MICHIGAN, IS DESCRIBED AS FOLLOWS:

PARCEL 3:

PART OF SECTION 12 AND THE SOUTHEAST 1/4 OF SECTION 1, TOWN 3 SOUTH, RANGE 7 EAST, YPSILANTI TOWNSHIP, WASHTENAW COUNTY, MICHIGAN, DESCRIBED AS BEGINNING AT NORTHEAST CORNER SECTION 12, THENCE SOUTH 01 DEGREES 27 MINUTES 26 SECONDS WEST 557.02 FEET ALONG EAST LINE SAID SECTION; THENCE NORTH 89 DEGREES 58 MINUTES 35 SECONDS WEST 994.29 FEET; THENCE SOUTH 00 DEGREES 01 MINUTES 25 SECONDS WEST 892.33 FEET; THENCE SOUTH 44 DEGREES 58 MINUTES 35 SECONDS EAST 253.84 FEET; THENCE SOUTH 89 DEGREES 58 MINUTES 35 SECONDS EAST 787.98 FEET; THENCE SOUTH 01 DEGREE 27 MINUTES 26 SECONDS WEST 1051.74 FEET ALONG EAST LINE SAID SECTION 12 TO EAST 1/4 CORNER SAID SECTION 12; THENCE SOUTH 00 DEGREES 02 MINUTES 43 SECONDS WEST 352.58 FEET ALONG EAST LINE SAID SECTION 12; THENCE SOUTH 89 DEGREES 42 MINUTES 46 SECONDS WEST 141.66 FEET; THENCE NORTH 40.00 FEET; THENCE NORTH 75 DEGREES 54 MINUTES 30 SECONDS WEST 404.79 FEET; THENCE WEST 473.73 FEET; THENCE SOUTH 00 DEGREES 08 MINUTES 45 SECONDS WEST 241.25 FEET; THENCE SOUTH 77 DEGREES 57 MINUTES 35 SECONDS WEST 4.93 FEET; THENCE SOUTH 00 DEGREES 03 MINUTES 01 SECONDS WEST 1102.74 FEET; THENCE ALONG ARC OF CURVE, CONCAVE TO THE NORTHEAST, RADIUS 334.72 FEET ARC DISTANCE 295.12 FEET CHORD SOUTH 25 DEGREES 12 MINUTES 33 MINUTES EAST 285.66 FEET; THENCE NORTH 64 DEGREES 36 MINUTES 55 SECONDS WEST 204.04 FEET; THENCE ALONG THE ARC OF A CURVE, CONCAVE TO THE NORTHEAST, RADIUS 3233.20 FEET ARC DISTANCE 454.26 FEET CHORD NORTH 60 DEGREES 35 MINUTES 25 SECONDS WEST 453.89 FEET; THENCE NORTH 56 DEGREES 33 MINUTES 55 SECONDS WEST 1484.43 FEET; THENCE ALONG ARC OF CURVE, CONCAVE TO THE NORTHEAST, RADIUS 3739.90 FEET ARC DISTANCE 130.30 FEET CHORD NORTH 55 DEGREES 34 MINUTES 02 SECONDS WEST 130.29 FEET; THENCE NORTH 54 DEGREES 34 MINUTES 09 SECONDS WEST 359.48 FEET; THENCE NORTH 89 DEGREES 55 MINUTES 54 SECONDS WEST 905.78 FEET; THENCE NORTH 00 DEGREES 03 MINUTES 30 SECONDS WEST 28.13 FEET; THENCE NORTH 75 DEGREES 21 MINUTES 04 SECONDS WEST 751.41 FEET; THENCE NORTH 34 DEGREES 14 MINUTES 31 SECONDS WEST 264.14 FEET; THENCE NORTH 17 DEGREES 41 MINUTES 20 SECONDS WEST 42.89 FEET; THENCE SOUTH 43 DEGREES 54 MINUTES 37 SECONDS EAST 4.23 FEET; THENCE NORTH 07 DEGREES 38 MINUTES 28 SECONDS EAST 76.94 FEET; THENCE NORTH 00 DEGREES 17 MINUTES 13 SECONDS WEST 116.77 FEET; THENCE NORTH 16 DEGREES 30 MINUTES 35 SECONDS EAST 91.37 FEET; THENCE NORTH 70 DEGREES 10 MINUTES 04 SECONDS EAST 76.60 FEET; THENCE SOUTH 89 DEGREES 59 MINUTES 08 SECONDS EAST 132.93 FEET; THENCE NORTH 74 DEGREES 57 MINUTES 39 SECONDS EAST 103.97 FEET; THENCE NORTH 62 DEGREES 44 MINUTES 44 SECONDS EAST 117.99 FEET; THENCE NORTH 56 DEGREES 19 MINUTES 26 SECONDS EAST 63.37 FEET; THENCE SOUTH 81 DEGREES 47 MINUTES 24 SECONDS EAST 95.70 FEET; THENCE SOUTH 41 DEGREES 29 MINUTES 39 SECONDS EAST 127.51 FEET;

THENCE SOUTH 20 DEGREES 59 MINUTES 39 SECONDS EAST 62.61 FEET; THENCE SOUTH 32 DEGREES 49 MINUTES 49 SECONDS WEST 51.48 FEET; THENCE SOUTH 11 DEGREES 53 MINUTES 00 SECONDS EAST 98.90 FEET; THENCE SOUTH 24 DEGREES 51 MINUTES 44 SECONDS EAST 167.55 FEET; THENCE SOUTH 26 DEGREES 55 MINUTES 41 SECONDS EAST 107.14 FEET; THENCE SOUTH 52 DEGREES 06 MINUTES 00 SECONDS EAST 67.16 FEET; THENCE SOUTH 73 DEGREES 01 MINUTES 57 SECONDS EAST 106.85 FEET; THENCE NORTH 89 DEGREES 36 MINUTES 14 SECONDS EAST 79.13 FEET; THENCE NORTH 71 DEGREES 50 MINUTES 27 SECONDS EAST 44.80 FEET; THENCE NORTH 31 DEGREES 22 MINUTES 45 SECONDS EAST 28.47 FEET; THENCE NORTH 01 DEGREE 45 MINUTES 03 SECONDS EAST 109.79 FEET; THENCE NORTH 09 DEGREES 38 MINUTES 11 SECONDS WEST 83.57 FEET; THENCE NORTH 51 DEGREES 10 MINUTES 30 SECONDS WEST 83.14 FEET; THENCE NORTH 35 DEGREES 44 MINUTES 20 SECONDS WEST 153.06 FEET; THENCE NORTH 44 DEGREES 45 MINUTES 42 SECONDS WEST 23.25 FEET; THENCE NORTH 17 DEGREES 35 MINUTES 43 SECONDS WEST 218.61 FEET; THENCE NORTH 16 DEGREES 24 MINUTES 34 SECONDS WEST 80.48 FEET; THENCE NORTH 33 DEGREES 34 MINUTES 36 SECONDS WEST 80.53 FEET; THENCE NORTH 20 DEGREES 43 MINUTES 09 SECONDS WEST 80.28 FEET; THENCE NORTH 02 DEGREES 37 MINUTES 46 SECONDS EAST 88.24 FEET; THENCE NORTH 16 DEGREES 05 MINUTES 51 SECONDS WEST 94.03 FEET; THENCE NORTH 10 DEGREES 35 MINUTES 29 SECONDS WEST 115.58 FEET; THENCE NORTH 25 DEGREES 11 MINUTES 25 SECONDS WEST 44.91 FEET; THENCE NORTH 11 DEGREES 32 MINUTES 30 SECONDS WEST 65.19 FEET; THENCE NORTH 13 DEGREES 43 MINUTES 37 SECONDS EAST 67.50 FEET; THENCE NORTH 60 DEGREES 18 MINUTES 26 SECONDS EAST 70.74 FEET; THENCE NORTH 89 DEGREES 01 MINUTES 39 SECONDS EAST 43.05 FEET; THENCE NORTH 60 DEGREES 36 MINUTES 22 SECONDS EAST 39.60 FEET; THENCE NORTH 75 DEGREES 28 MINUTES 45 SECONDS EAST 118.86 FEET; THENCE NORTH 40 DEGREES 42 MINUTES 55 SECONDS EAST 43.95 FEET; THENCE NORTH 69 DEGREES 36 MINUTES 11 SECONDS EAST 46.74 FEET; THENCE NORTH 20 DEGREES 37 MINUTES 49 SECONDS EAST 90.38 FEET TO POINT ON WESTERLY LINE OF RAILROAD R/W 100 FEET WIDE; THENCE SOUTH 04 DEGREES 36 MINUTES 50 SECONDS EAST 125.71 FEET ALONG SAID RAILROAD R/W LINE; THENCE NORTH 69 DEGREES 34 MINUTES 21 SECONDS EAST 69.21 FEET; THENCE NORTH 69 DEGREES 33 MINUTES 20 SECONDS EAST 34.73 FEET TO A POINT ON EASTERLY LINE OF SAID RAILROAD R/W; THENCE NORTH 04 DEGREES 36 MINUTES 50 SECONDS WEST 328.62 FEET ALONG EASTERLY LINE OF SAID RAILROAD R/W; THENCE ALONG THE ARC OF A CURVE, CONCAVE TO THE WEST, RADIUS 1462.69 FEET ARC DISTANCE 419.53 FEET CHORD NORTH 12 DEGREES 49 MINUTES 50 SECONDS WEST 418.09 FEET ALONG EASTERLY LINE OF SAID RAILROAD R/W; THENCE NORTH 20 DEGREES 55 MINUTES 15 SECONDS WEST 284.08 FEET ALONG EASTERLY LINE OF SAID RAILROAD R/W; THENCE FOLLOWING COURSES AND DISTANCE ALONG SOUTHERLY LINE ECORSE ROAD (M-17/US-12 BY-PASS), ALONG THE ARC OF A CURVE CONCAVE TO THE SOUTH, RADIUS 3967.56 FEET ARC DISTANCE 669.08 FEET, CHORD NORTH 73 DEGREES 52 MINUTES 13 SECONDS EAST 668.29 FEET; THENCE NORTH 78 DEGREES 42 MINUTES 05 SECONDS EAST 325.43 FEET; THENCE ALONG THE ARC OF A CURVE CONCAVE TO THE SOUTHWEST RADIUS 618.70 FEET ARC DISTANCE 845.04 FEET CHORD SOUTH 62 DEGREES 04 MINUTES 00 SECONDS EAST 780.87 FEET; THENCE SOUTH 22 DEGREES 10 MINUTES 00 SECONDS WEST 200.92 FEET; THENCE NORTH 61 DEGREES 05 MINUTES 34 SECONDS EAST 290.02 FEET; THENCE NORTH 61 DEGREES 03 MINUTES 56 SECONDS EAST 55.20 FEET; THENCE NORTH 00 DEGREES 01 MINUTE 50 SECONDS WEST 170.15 FEET; THENCE NORTH 89 DEGREES 57 MINUTES 30 SECONDS EAST 180.74 FEET; THENCE SOUTH 00 DEGREES 02 MINUTES 30 SECONDS EAST 70.42 FEET; THENCE NORTH 61 DEGREES 07 MINUTES 04 SECONDS EAST 275.27 FEET; THENCE ALONG THE ARC OF A CURVE CONCAVE TO THE SOUTHEAST RADIUS 2185.04 FEET ARC DISTANCE 177.67 FEET CHORD NORTH 14 DEGREES 11 MINUTES 51 SECONDS EAST 177.62 FEET; THENCE ALONG THE ARC OF A CURVE CONCAVE TO THE SOUTHEAST RADIUS 469.38 FEET ARC DISTANCE 509.49 FEET CHORD NORTH 47 DEGREES 37 MINUTES 21 SECONDS EAST 484.84 FEET; THENCE NORTH 78 DEGREES 43 MINUTES 06 SECONDS EAST 1050.35 FEET; THENCE ALONG THE ARC OF A CURVE CONCAVE TO THE SOUTH RADIUS 2161.92 FEET ARC DISTANCE 178.46 FEET CHORD NORTH 81 DEGREES 04 MINUTES 59 SECONDS EAST 178.41 FEET; THENCE SOUTH 45 DEGREES 13 MINUTES 15 SECONDS EAST 196.15 FEET TO THE EAST LINE OF SAID SECTION 1; THENCE SOUTH 03 DEGREES 46 MINUTES 45 SECONDS WEST 319.00 FEET ALONG EAST LINE OF SAID SECTION 1 TO POINT OF BEGINNING.

EXCEPT:

PART OF EAST 1/2 SECTION 12, TOWN 3 SOUTH, RANGE 7 EAST, YPSILANTI TOWNSHIP, WASHTENAW COUNTY, MICHIGAN DESCRIBED COMMENCING NORTHEAST CORNER SECTION 12 AND RUNNING THENCE SOUTH 01 DEGREE 27 MINUTES 26 SECONDS WEST ALONG THE EAST LINE OF SAID SECTION 12, 33.00 FEET TO THE NORTHWEST CORNER OF SECTION 7, TOWN 3 SOUTH, RANGE 8 EAST, VAN

BUREN TOWNSHIP, WAYNE COUNTY, MICHIGAN; THENCE NORTH 87 DEGREES 37 MINUTES 30 SECONDS EAST ALONG THE NORTH LINE OF SAID SECTION 7, 33.07 FEET; THENCE SOUTH 01 DEGREE 27 MINUTES 26 SECONDS WEST ALONG A LINE PARALLEL WITH THE LINE COMMON TO SAID SECTIONS 7 AND 12, 525.40 FEET TO A POINT; THENCE NORTH 89 DEGREES 58 MINUTES 35 SECONDS WEST CROSSING SAID COMMON SECTION LINE, 1027.30 FEET TO A POINT IN THE INTERIOR OF SAID SECTION 12; THENCE SOUTH 00 DEGREES 01 MINUTES 25 SECONDS WEST 892.33 FEET TO A POINT; THENCE SOUTH 44 DEGREES 58 MINUTES 35 SECONDS EAST 253.84 FEET TO A POINT; THENCE SOUTH 89 DEGREES 58 MINUTES 35 SECONDS EAST 787.98 FEET TO POINT ON THE EAST LINE OF SAID SECTION 12; THENCE SOUTH 01 DEGREE 27 MINUTES 26 SECONDS WEST 574.39 FEET TO THE POINT OF BEGINNING; PROCEEDING THENCE FROM SAID POINT OF BEGINNING SOUTH 01 DEGREE 27 MINUTES 26 SECONDS WEST ALONG THE EAST LINE OF SAID SECTION 12, 477.35 FEET TO THE EAST 1/4 CORNER OF SAID SECTION 12; THENCE SOUTH 00 DEGREES 02 MINUTES 43 SECONDS WEST ALONG THE EAST LINE OF SAID SECTION 12, 352.56 FEET TO A POINT; THENCE SOUTH 89 DEGREES 42 MINUTES 46 SECONDS WEST 141.66 FEET TO A POINT; THENCE NORTH 40.00 FEET TO A POINT; THENCE NORTH 75 DEGREES 54 MINUTES 30 SECONDS WEST 404.79 FEET TO A POINT; THENCE WEST 512.11 FEET TO A POINT; THENCE NORTH 00 DEGREES 02 MINUTES 00 SECONDS EAST 418.67 FEET TO A POINT; THENCE SOUTH 89 DEGREES 58 MINUTES 00 SECONDS EAST 443.50 FEET TO A POINT; THENCE NORTH 45 DEGREES 02 MINUTES 00 SECONDS EAST 69.30 FEET TO A POINT; THENCE NORTH 00 DEGREES 02 MINUTES 00 SECONDS EAST 224.85 FEET TO A POINT; THENCE SOUTH 89 DEGREES 58 MINUTES 00 SECONDS EAST 565.84 FEET TO THE POINT OF BEGINNING.

PARCEL 4:

PART OF NORTHWEST 1/4 OF SECTION 12, TOWN 3 SOUTH, RANGE 7 EAST, YPSILANTI TOWNSHIP, WASHTENAW COUNTY, MICHIGAN, DESCRIBED AS COMMENCING AT A POINT ON THE WEST LINE OF SECTION 12, DISTANT SOUTH 00 DEGREES 27 MINUTES 23 SECONDS WEST 966.09 FEET, AS MEASURED ALONG SAID SECTION LINE, FROM THE NORTHWEST CORNER OF SAID SECTION; PROCEEDING THENCE FROM SAID POINT OF BEGINNING ALONG SOUTHERLY LINE ECORSE ROAD (M-17/US-12 BY-PASS) ALONG THE ARC OF A CURVE CONCAVE TO THE SOUTHEAST RADIUS 3967.56 FEET ARC DISTANT 1235.00 FEET CHORD NORTH 58 DEGREES 39 MINUTES 51 SECONDS EAST 1230.02 FEET; THENCE SOUTH 20 DEGREES 55 MINUTES 15 SECONDS EAST 50.00 FEET ALONG WESTERLY LINE OF RAILROAD R/W 100 FEET WIDE; THENCE SOUTH 53 DEGREES 48 MINUTES 59 SECONDS WEST 71.30 FEET; THENCE SOUTH 08 DEGREES 34 MINUTES 55 SECONDS EAST 83.90 FEET; THENCE SOUTH 07 DEGREES 04 MINUTES 52 SECONDS WEST 137.67 FEET; THENCE SOUTH 11 DEGREES 57 MINUTES 20 SECONDS E 101.65 FEET; THENCE SOUTH 01 DEGREE 33 MINUTES 01 SECONDS EAST 127.84 FEET; THENCE SOUTH 02 DEGREES 01 MINUTES 48 SECONDS WEST 73.23 FEET; THENCE SOUTH 05 DEGREES 10 MINUTES 51 SECONDS WEST 98.66 FEET; THENCE SOUTH 02 DEGREES 06 MINUTES 41 SECONDS WEST 153.11 FEET; THENCE SOUTH 50 DEGREES 19 MINUTES 07 SECONDS WEST 74.99 FEET; THENCE SOUTH 64 DEGREES 54 MINUTES 53 SECONDS WEST 87.17 FEET; THENCE SOUTH 78 DEGREES 29 MINUTES 01 SECONDS WEST 90.60 FEET; THENCE NORTH 62 DEGREES 36 MINUTES 10 SECONDS WEST 144.02 FEET; THENCE SOUTH 79 DEGREES 41 MINUTES 35 SECONDS WEST 135.41 FEET; THENCE SOUTH 76 DEGREES 01 MINUTE 50 SECONDS WEST 96.30 FEET; THENCE SOUTH 21 DEGREES 00 MINUTES 09 SECONDS WEST 47.96 FEET; THENCE SOUTH 56 DEGREES 54 MINUTES 29 SECONDS EAST 63.20 FEET; THENCE NORTH 85 DEGREES 30 MINUTES 36 SECONDS EAST 89.47 FEET; THENCE SOUTH 74 DEGREES 40 MINUTES 08 SECONDS EAST 93.32 FEET; THENCE SOUTH 46 DEGREES 01 MINUTE 17 SECONDS EAST 92.21 FEET; THENCE SOUTH 04 DEGREES 37 MINUTES 27 SECONDS WEST 113.77 FEET; THENCE SOUTH 04 DEGREES 57 MINUTES 08 SECONDS EAST 92.83 FEET; THENCE SOUTH 44 DEGREES 23 MINUTES 10 SECONDS EAST 61.99 FEET; THENCE SOUTH 00 DEGREES 42 MINUTES 15 SECONDS WEST 85.68 FEET; THENCE SOUTH 17 DEGREES 03 MINUTES 22 SECONDS WEST 54.40 FEET; THENCE SOUTH 17 DEGREES 21 MINUTES 29 SECONDS WEST 68.54 FEET; THENCE SOUTH 58 DEGREES 55 MINUTES 04 SECONDS WEST 55.22 FEET; THENCE SOUTH 35 DEGREES 03 MINUTES 54 SECONDS WEST 92.30 FEET; THENCE SOUTH 70 DEGREES 49 MINUTES 58 SECONDS WEST 75.01 FEET; THENCE SOUTH 74 DEGREES 32 MINUTES 42 SECONDS WEST 91.61 FEET; THENCE SOUTH 69 DEGREES 02 MINUTES 34 SECONDS WEST 86.16 FEET; THENCE NORTH 88 DEGREES 37 MINUTES 01 SECONDS WEST 78.27 FEET; THENCE SOUTH 83 DEGREES 46 MINUTES 45 SECONDS WEST 104.57 FEET; THENCE SOUTH 58 DEGREES 22 MINUTES 14 SECONDS WEST 58.17 FEET; THENCE SOUTH 52 DEGREES 53 MINUTES 19 SECONDS WEST 87.86 FEET TO A POINT ON EASTERLY LINE WILLOW RUN EXPRESSWAY; THENCE NORTH 17 DEGREES 41 MINUTES 20 SECONDS WEST 281.68 FEET ALONG EASTERLY LINE OF SAID WILLOW RUN EXPRESSWAY TO POINT ON WEST LINE SECTION 12; THENCE NORTH 00 DEGREES 27 MINUTES 23 SECONDS EAST 927.30 FEET

ALONG WEST LINE SECTION 12 AND SAID EASTERLY LINE OF SAID WILLOW RUN EXPRESSWAY TO
POINT OF BEGINNING.

EXHIBIT 2
SURVEY OF PROPERTY

WIARD ROAD - WILLOW RUN EXPRESSWAY

SECTION 1, T. 3 S., R. 7 E.
ECORSE ROAD (M-17 | US-12 BY-PASS)

SECTION 6,
T. 3 S., R. 7 E.

PARCEL 4

PARCEL 1

OLD ECORSE ROAD

PARCEL 3

PARCEL 2

SECTION 12, T. 3 S., R. 7 E.

SECTION 7,
T. 3 S., R. 7 E.

AIRPORT DRIVE

AIRPORT DRIVE



David C. Adams & Son
Professional Land Surveyors, Inc.
25517 Five Mile Road
Detroit, Michigan 48239
Tel: 313-538-1222
Fax: 313-638-8438
www.DCAsurveys.com

PROJECT MAP
SCALE: NONE

YPSILANTI TWP.
WASHTENAW CO.

VAN BUREN TWP.
WAYNE CO.

RCRA DRC
Exhibit 2

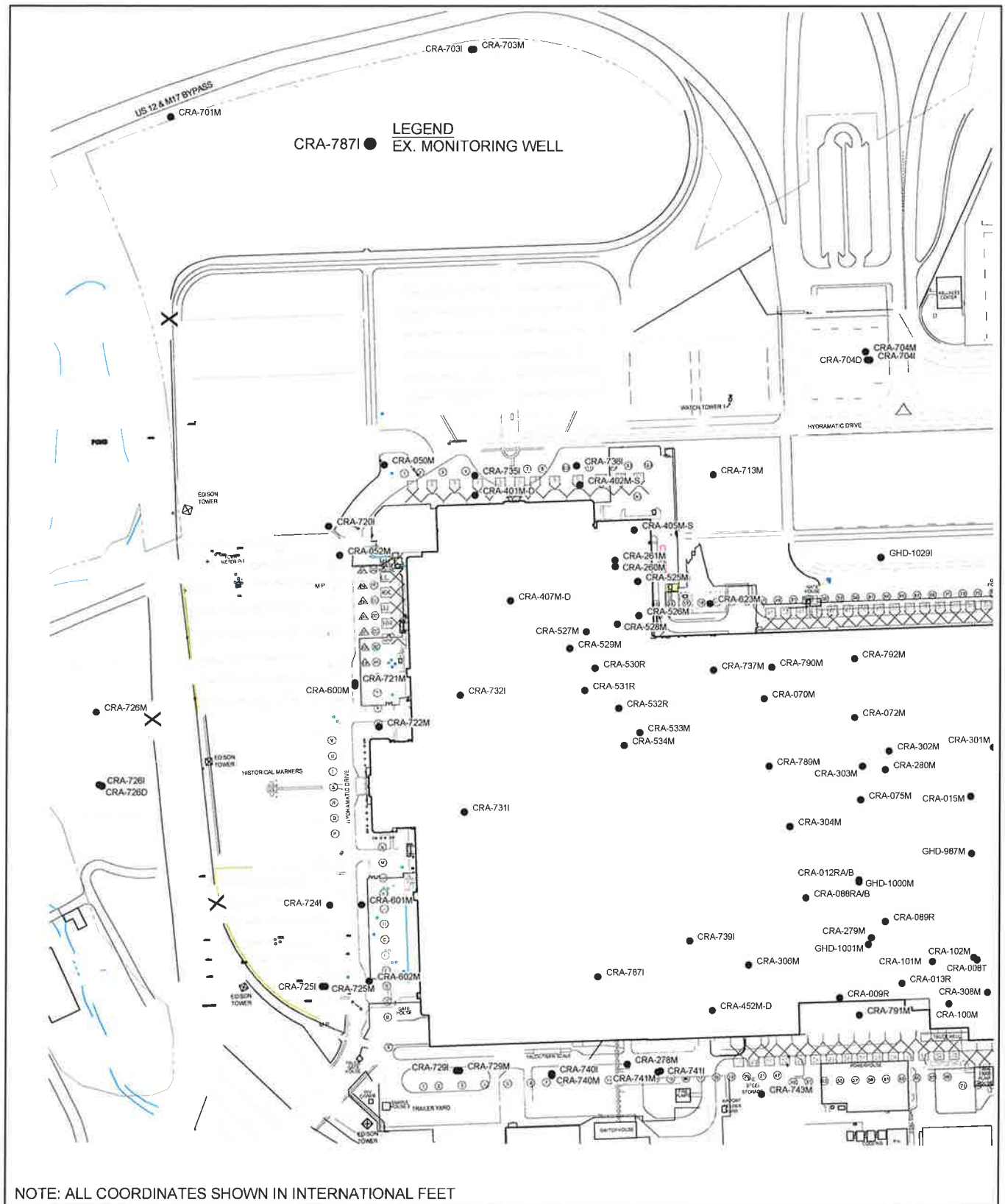
EXHIBIT 3

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, automotive testing and proving grounds 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.

EXHIBIT 4
MONITORING WELL LOCATIONS

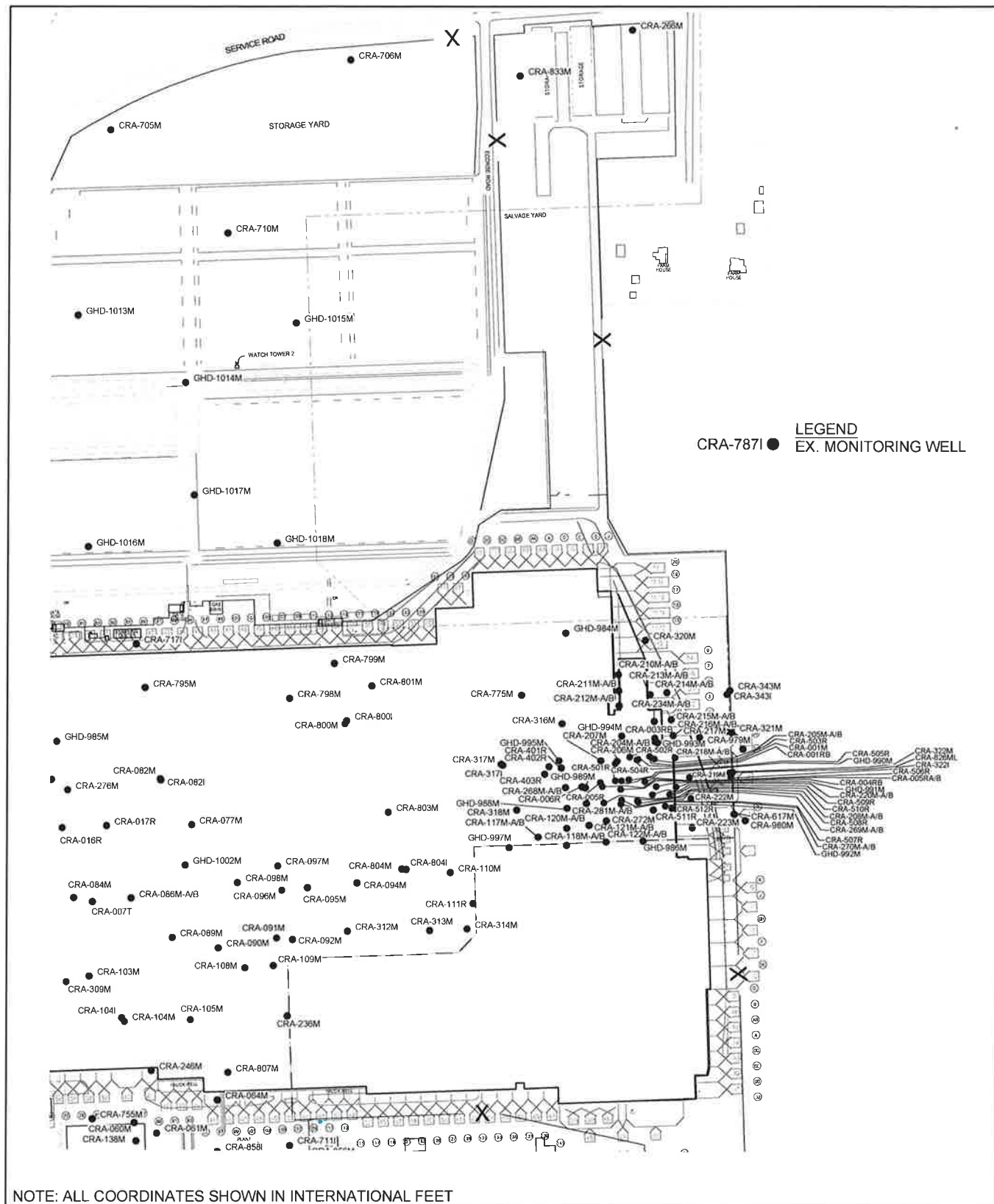


FORMER POWERTRAIN PLANT
YPSILANTI, MICHIGAN

RESTRICTIVE COVENANT
MONITORING WELL LOCATIONS

081613-09
Oct 27, 2016

RCRA DRC
EXHIBIT 4a



0 175 350ft

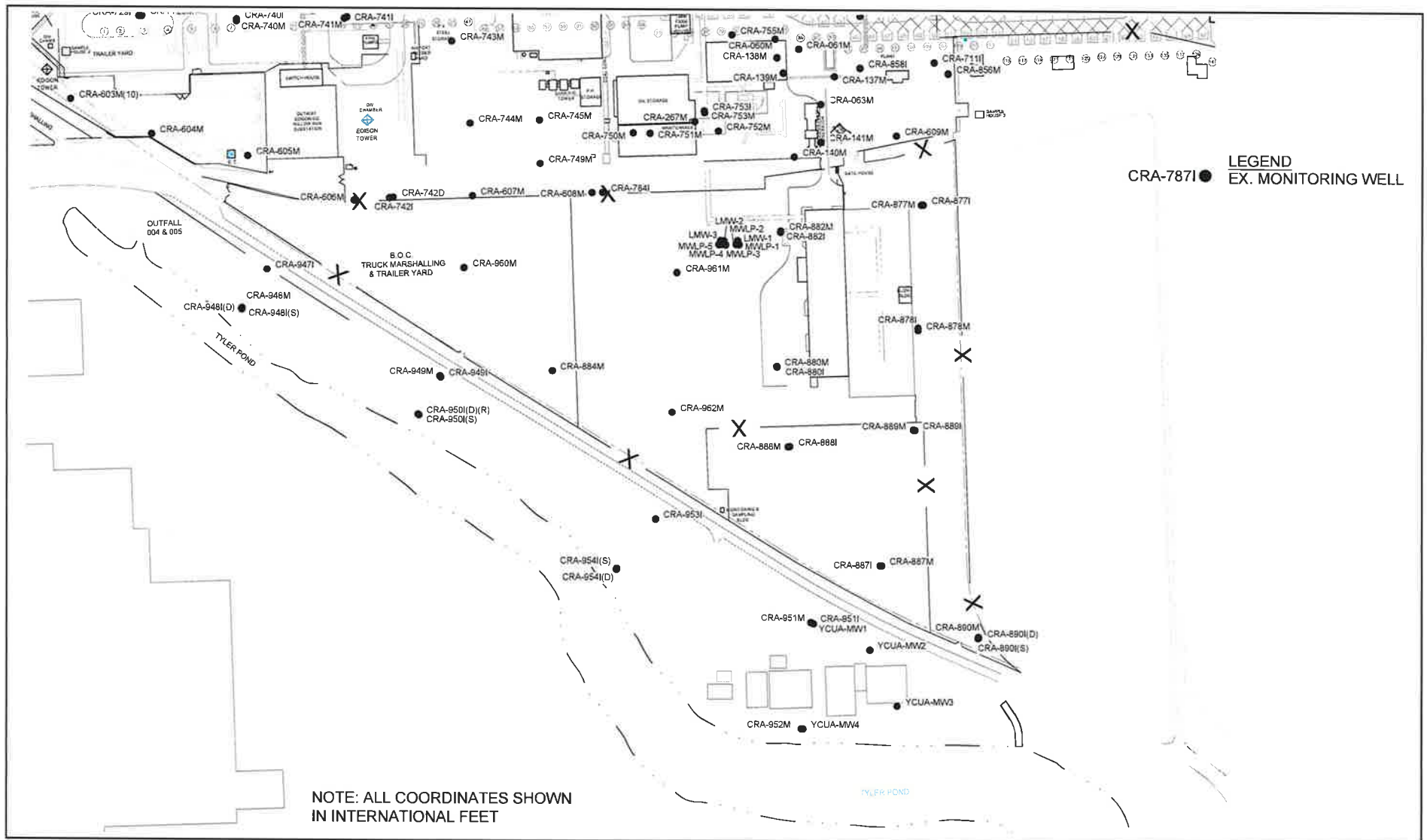


FORMER POWERTRAIN PLANT
YPSILANTI, MICHIGAN

RESTRICTIVE COVENANT
MONITORING WELL LOCATIONS

081613-09
Oct 27, 2016

RCRA DRC
EXHIBIT 4b



0 175 350ft



FORMER POWERTRAIN PLANT
YPSILANTI, MICHIGAN

RESTRICTIVE COVENANT
MONITORING WELL LOCATIONS

081613-09

Oct 28, 2016

RCRA DRC
EXHIBIT 4c

Well ID	Easting (X) (Int Ft.)	Northing (Y) (Int Ft.)	Well ID	Easting (X) (Int Ft.)	Northing (Y) (Int Ft.)
CRA-001M	13,345,841.32000	271,385.06400	CRA-110M	13,345,356.53000	271,092.38900
CRA-001RB	13,345,838.21000	271,383.83800	CRA-111R	13,345,416.18000	271,012.95700
CRA-003RB	13,345,884.17000	271,439.72400	CRA-117M-A/B	13,345,584.45300	271,183.59700
CRA-004RB	13,345,796.02000	271,307.15600	CRA-118M-A/B	13,345,658.20200	271,163.22100
CRA-005R	13,345,743.02200	271,325.02900	CRA-120M-A/B	13,345,658.84400	271,206.57700
CRA-005RA/B	13,345,748.20500	271,314.47000	CRA-121M-A/B	13,345,715.30100	271,213.71200
CRA-006R	13,345,696.90600	271,313.59500	CRA-122M-A/B	13,345,758.23200	271,171.04800
CRA-007T	13,344,427.61500	271,017.21900	CRA-137M	13,344,689.19400	270,351.39000
CRA-008T	13,344,278.68000	270,783.46000	CRA-138M	13,344,543.37000	270,397.23000
CRA-009R	13,343,919.68000	270,684.47000	CRA-139M	13,344,559.05000	270,359.54000
CRA-012RA/B	13,343,969.27400	270,990.16700	CRA-140M	13,344,587.59000	270,147.13000
CRA-013R	13,344,080.81000	270,722.58000	CRA-141M	13,344,655.23500	270,184.49000
CRA-015M	13,344,260.78000	271,206.44000	CRA-204M-A/B	13,345,885.69000	271,430.33700
CRA-016R	13,344,348.72000	271,207.85000	CRA-205M-A/B	13,345,882.45000	271,386.12900
CRA-017R	13,344,463.08000	271,213.49000	CRA-206M	13,345,786.81000	271,380.44000
CRA-050M	13,342,732.84000	272,065.72000	CRA-207M	13,345,744.39000	271,381.48900
CRA-052M	13,342,618.64000	271,830.92500	CRA-208M-A/B	13,345,752.51000	271,272.02000
CRA-060M	13,344,538.68000	270,444.57000	CRA-210M-A/B	13,345,789.38000	271,604.90000
CRA-061M	13,344,597.38500	270,418.94300	CRA-211M-A/B	13,345,790.60000	271,562.63100
CRA-063M	13,344,654.77000	270,281.07000	CRA-212M-A/B	13,345,791.27000	271,523.77200
CRA-064M	13,344,753.43000	270,503.59600	CRA-213M-A/B	13,345,872.07000	271,553.06000
CRA-070M	13,343,723.55000	271,459.47000	CRA-214M-A/B	13,345,915.74000	271,558.20200
CRA-072M	13,343,956.74200	271,411.09300	CRA-215M-A/B	13,345,927.39000	271,487.41200
CRA-075M	13,343,973.28000	271,197.45000	CRA-216M-A/B	13,345,932.62000	271,446.94900
CRA-077M	13,344,684.49000	271,216.60000	CRA-217M	13,346,002.44000	271,442.11800
CRA-082I	13,344,604.29000	271,331.75900	CRA-218M-A/B	13,345,938.16000	271,388.66400
CRA-082M	13,344,603.04000	271,334.98000	CRA-219M	13,345,975.67000	271,337.99600
CRA-084M	13,344,379.60000	271,027.75000	CRA-220M-A/B	13,345,941.12000	271,313.28200
CRA-086M-A/B	13,344,528.64000	271,025.84000	CRA-222M	13,345,979.63000	271,283.91600
CRA-088RA/B	13,343,832.57900	270,943.74500	CRA-223M	13,345,982.93000	271,208.22100
CRA-089M	13,344,634.91900	270,925.25600	CRA-234M-A/B	13,345,882.34000	271,483.38500
CRA-089R	13,344,037.39600	270,882.74300	CRA-236M	13,344,934.60000	270,720.34000
CRA-090M	13,344,754.80000	270,897.89000	CRA-246M	13,344,582.54000	270,579.73000
CRA-091M	13,344,906.08000	270,922.23500	CRA-260M	13,343,332.65080	271,801.77390
CRA-092M	13,344,947.52000	270,919.31700	CRA-261M	13,343,331.85290	271,818.24850
CRA-094M	13,345,112.99300	271,065.72200	CRA-266M	13,345,820.74000	273,275.94300
CRA-095M	13,344,985.12100	271,053.26900	CRA-267M	13,344,335.07000	270,235.54000
CRA-096M	13,344,919.51300	271,047.13100	CRA-268M-A/B	13,345,655.16000	271,311.85200
CRA-097M	13,344,908.60100	271,110.29600	CRA-269M-A/B	13,345,841.73000	271,273.92200
CRA-098M	13,344,803.74200	271,066.97500	CRA-270M-A/B	13,345,796.88000	271,268.52700
CRA-100M	13,344,204.27000	270,669.93000	CRA-272M	13,345,758.77000	271,225.35300
CRA-101M	13,344,160.78000	270,778.95000	CRA-276M	13,344,362.88800	271,305.87200
CRA-102M	13,344,269.22000	270,790.00000	CRA-278M	13,343,367.79300	270,512.50900
CRA-103M	13,344,419.79000	270,824.72000	CRA-279M	13,344,001.79900	270,840.59700
CRA-104I	13,344,505.31000	270,717.24200	CRA-280M	13,344,035.86200	271,275.68800
CRA-104M	13,344,512.33000	270,707.91100	CRA-281M-A/B	13,345,707.98000	271,270.47000
CRA-105M	13,344,682.67700	270,712.58900	CRA-301M	13,344,320.02339	271,334.02793
CRA-108M	13,344,824.03000	270,846.50300	CRA-302M	13,344,045.90071	271,324.11024
CRA-109M	13,344,898.30000	270,851.18900	CRA-303M	13,343,977.42602	271,284.27267



Former Powertrain Plant
Ypsilanti, Michigan

RCRA Restrictive Covenant
Monitoring Well Locations

RCRA DRC
Exhibit 4d

Well ID	Easting (X) (Int Ft.)	Northing (Y) (Int Ft.)	Well ID	Easting (X) (Int Ft.)	Northing (Y) (Int Ft.)
CRA-304M	13,343,791.08010	271,128.37840	CRA-602M	13,342,698.89000	270,727.58400
CRA-306M	13,343,684.82992	270,769.31869	CRA-603M(10)	13,342,755.16000	270,286.84060
CRA-308M	13,344,305.92580	270,699.52199	CRA-604M	13,342,960.17000	270,198.31670
CRA-309M	13,344,361.02465	270,810.25247	CRA-605M	13,343,203.77000	270,144.28000
CRA-312M	13,345,088.08000	270,941.15000	CRA-606M	13,343,472.56000	270,031.68000
CRA-313M	13,345,302.60933	270,941.64915	CRA-607M	13,343,772.08000	270,043.71000
CRA-314M	13,345,401.12000	270,945.65800	CRA-608M	13,344,074.92000	270,053.10200
CRA-316M	13,345,645.75100	271,477.66600	CRA-609M	13,344,846.64000	270,201.51200
CRA-317I	13,345,492.79000	271,369.77800	CRA-623M	13,343,581.00000	271,706.40570
CRA-317M	13,345,488.96000	271,372.88100	CRA-701M	13,342,175.77000	272,966.91700
CRA-318M	13,345,529.95341	271,253.80929	CRA-703I	13,342,956.51000	273,141.37200
CRA-320M	13,345,859.07200	271,693.81700	CRA-703M	13,342,962.90000	273,141.69200
CRA-321M	13,346,085.53000	271,454.51300	CRA-704D	13,343,987.97700	272,338.01200
CRA-322I	13,346,084.08000	271,340.81600	CRA-704I	13,343,994.03000	272,337.19900
CRA-322M	13,346,088.73000	271,351.40200	CRA-704M	13,343,982.81000	272,358.79700
CRA-343I	13,346,073.48000	271,553.66400	CRA-705M	13,344,466.81500	273,016.22500
CRA-343M	13,346,080.93000	271,563.31300	CRA-706M	13,345,089.17900	273,198.07700
CRA-401M-D	13,342,970.58030	271,987.02290	CRA-710M	13,344,773.24400	272,749.44700
CRA-401R	13,345,644.24000	271,362.97400	CRA-711I	13,344,941.61900	270,386.61100
CRA-402M-S	13,343,242.19760	272,013.47570	CRA-713M	13,343,587.77000	272,039.98000
CRA-402R	13,345,611.69000	271,366.13700	CRA-717I	13,344,539.24000	271,684.35300
CRA-403R	13,345,600.63000	271,346.91800	CRA-720I	13,342,590.17000	271,906.55500
CRA-405M-S	13,343,381.60200	271,896.29300	CRA-721M	13,342,658.70000	271,500.40400
CRA-407M-D	13,343,064.56241	271,713.11624	CRA-722M	13,342,721.87000	271,385.84820
CRA-452M-D	13,343,590.04700	270,652.24700	CRA-724I	13,342,596.15000	270,924.23100
CRA-501R	13,345,781.37300	271,373.75700	CRA-725I	13,342,578.64000	270,713.35700
CRA-502R	13,345,819.67600	271,390.40100	CRA-725M	13,342,584.81000	270,713.54400
CRA-503R	13,345,870.94100	271,392.23900	CRA-726D	13,342,004.20000	271,232.11200
CRA-504R	13,345,781.98000	271,329.27800	CRA-726I	13,341,996.19000	271,235.27900
CRA-505R	13,345,817.15000	271,332.42100	CRA-726M	13,341,988.42000	271,424.11600
CRA-506R	13,345,858.84000	271,327.10300	CRA-729I	13,342,927.49000	270,495.73400
CRA-507R	13,345,798.73000	271,279.48500	CRA-729M	13,342,934.83000	270,495.72500
CRA-508R	13,345,840.19000	271,277.78200	CRA-731I	13,342,945.25000	271,165.38530
CRA-509R	13,345,878.56000	271,293.36800	CRA-732I	13,342,933.84000	271,468.40270
CRA-510R	13,345,924.02000	271,294.72300	CRA-735I	13,342,969.83000	272,038.19700
CRA-511R	13,345,880.82700	271,253.37900	CRA-736I	13,343,233.67000	272,063.51200
CRA-512R	13,345,929.51500	271,257.40600	CRA-737M	13,343,591.17000	271,533.39480
CRA-525M	13,343,391.46847	271,763.20446	CRA-739I	13,343,529.49000	270,831.88000
CRA-526M	13,343,394.42181	271,674.62005	CRA-740I	13,343,174.30000	270,487.91500
CRA-527M	13,343,259.47187	271,632.82373	CRA-740M	13,343,174.55000	270,483.91900
CRA-528M	13,343,338.25898	271,652.65919	CRA-741I	13,343,453.85000	270,494.97000
CRA-529M	13,343,217.77900	271,589.37361	CRA-741M	13,343,447.58000	270,492.53300
CRA-530R	13,343,282.60112	271,538.10048	CRA-742D	13,343,571.89800	270,039.03500
CRA-531R	13,343,256.38069	271,480.75599	CRA-742I	13,343,562.24000	270,037.93300
CRA-532R	13,343,342.80000	271,434.48630	CRA-743M	13,343,719.29000	270,435.64000
CRA-533M	13,343,397.83000	271,371.33500	CRA-744M	13,343,765.91000	270,229.52000
CRA-534M	13,343,357.32000	271,338.02520	CRA-745M	13,343,940.90000	270,238.02300
CRA-600M	13,342,658.87000	271,492.53800	CRA-749M	13,343,943.06000	270,127.11000
CRA-601M	13,342,677.83000	270,925.28170	CRA-750M	13,344,179.57000	270,206.70600



Former Powertrain Plant
Ypsilanti, Michigan

RCRA Restrictive Covenant Monitoring Well Locations

RCRA DRC
Exhibit 4e

Well ID	Easting (X) (Int Ft.)	Northing (Y) (Int Ft.)	Well ID	Easting (X) (Int Ft.)	Northing (Y) (Int Ft.)
CRA-751M	13,344,221.90000	270,205.24000	CRA-950I(D)(R)	13,343,635.46000	269,490.51900
CRA-752M	13,344,395.08000	270,211.80000	CRA-950I(S)	13,343,637.83000	269,488.36000
CRA-753I	13,344,359.01000	270,263.41000	CRA-951I	13,344,634.49100	268,966.18600
CRA-753M	13,344,360.27000	270,259.17000	CRA-951M	13,344,631.65200	268,967.52900
CRA-755M	13,344,429.11000	270,454.77900	CRA-952M	13,344,606.95000	268,696.53800
CRA-775M	13,345,541.46200	271,552.01300	CRA-953I	13,344,236.42200	269,227.49200
CRA-784I	13,344,101.73000	270,053.67000	CRA-954I(D)	13,344,137.26200	269,100.74700
CRA-787I	13,343,292.00000	270,739.25970	CRA-954I(S)	13,344,137.71200	269,103.07000
CRA-789M	13,343,736.53000	271,284.63640	CRA-960M	13,343,751.35500	269,861.87500
CRA-790M	13,343,742.62000	271,541.33870	CRA-961M	13,344,290.68800	269,851.13800
CRA-791M	13,343,971.25000	270,640.29750	CRA-962M	13,344,277.77800	269,498.23500
CRA-792M	13,343,955.84000	271,563.35920	CRA-979M	13,346,115.41600	271,411.75800
CRA-795M	13,344,562.92000	271,571.25350	CRA-980M	13,346,121.52300	271,226.19200
CRA-798M	13,344,938.18000	271,543.88370	GHD-1000M	13,343,969.52000	270,984.82600
CRA-799M	13,345,052.25000	271,633.87610	GHD-1001M	13,343,993.89500	270,823.33100
CRA-800I	13,345,084.89000	271,485.81200	GHD-1002M	13,344,667.55600	271,112.59700
CRA-800M	13,345,080.24000	271,478.39130	GHD-1013M	13,344,384.69000	272,536.45200
CRA-801M	13,345,149.47000	271,575.96150	GHD-1014M	13,344,664.45000	272,362.25300
CRA-803M	13,345,193.09400	271,248.83500	GHD-1015M	13,344,951.57000	272,516.28400
CRA-804I	13,345,240.62200	271,100.87200	GHD-1016M	13,344,413.48000	271,936.43600
CRA-804M	13,345,229.07800	271,102.24100	GHD-1017M	13,344,688.15000	272,070.66100
CRA-807M	13,344,781.12100	270,574.71700	GHD-1018M	13,344,904.33000	271,946.14300
CRA-826ML	13,346,081.46600	271,350.52400	GHD-1029I	13,344,023.87000	271,825.70000
CRA-856M	13,344,977.50000	270,359.16800	GHD-984M	13,345,654.45700	271,713.13600
CRA-858I	13,344,754.20000	270,371.88000	GHD-985M	13,344,333.53000	271,432.61400
CRA-877I	13,344,914.93000	270,025.26200	GHD-986M	13,345,854.40700	271,172.93900
CRA-877M	13,344,910.01000	270,024.98100	GHD-987M	13,344,262.95900	271,058.58500
CRA-878I	13,344,901.92000	269,715.27900	GHD-988M	13,345,659.39500	271,258.48700
CRA-878M	13,344,901.81000	269,709.75300	GHD-989M	13,345,705.19500	271,311.32500
CRA-880I	13,344,543.73000	269,615.61600	GHD-990M	13,345,797.88900	271,329.70400
CRA-880M	13,344,543.59000	269,617.82000	GHD-991M	13,345,888.57200	271,314.20200
CRA-882I	13,344,553.37000	269,954.34800	GHD-992M	13,345,912.03800	271,263.69000
CRA-882M	13,344,553.79000	269,958.26700	GHD-993M	13,345,891.27300	271,428.22800
CRA-884M	13,343,974.42000	269,604.53900	GHD-994M	13,345,798.44900	271,445.63400
CRA-887I	13,344,805.66000	269,112.02900	GHD-995M	13,345,637.91200	271,381.08900
CRA-887M	13,344,810.07000	269,111.69200	GHD-997M	13,345,510.15400	271,157.42600
CRA-888I	13,344,577.13000	269,411.76500	LMW-1	13,344,444.90300	269,933.20500
CRA-888M	13,344,573.09000	269,411.29200	LMW-2	13,344,409.93500	269,932.72000
CRA-889I	13,344,893.54000	269,454.34900	LMW-3	13,344,401.19000	269,932.79900
CRA-889M	13,344,889.97000	269,454.54200	MWLP-1	13,344,448.41800	269,923.13200
CRA-890I(D)	13,345,057.32000	268,929.18300	MWLP-2	13,344,440.78600	269,923.52500
CRA-890I(S)	13,345,055.54000	268,927.41400	MWLP-3	13,344,414.25600	269,922.73600
CRA-890M	13,345,056.16000	268,931.05600	MWLP-4	13,344,405.78000	269,923.70500
CRA-947I	13,343,252.46700	269,856.29700	MWLP-5	13,344,396.94400	269,922.90300
CRA-948I(D)	13,343,188.25300	269,758.51700	YCUA-MW1	13,344,638.26100	268,963.81200
CRA-948I(S)	13,343,189.79000	269,757.04700	YCUA-MW2	13,344,780.05100	268,898.17600
CRA-948M	13,343,190.38600	269,760.49500	YCUA-MW3	13,344,850.32700	268,753.55200
CRA-949I	13,343,691.98900	269,587.23100	YCUA-MW4	13,344,610.64400	268,696.27800
CRA-949M	13,343,690.12300	269,590.00100			



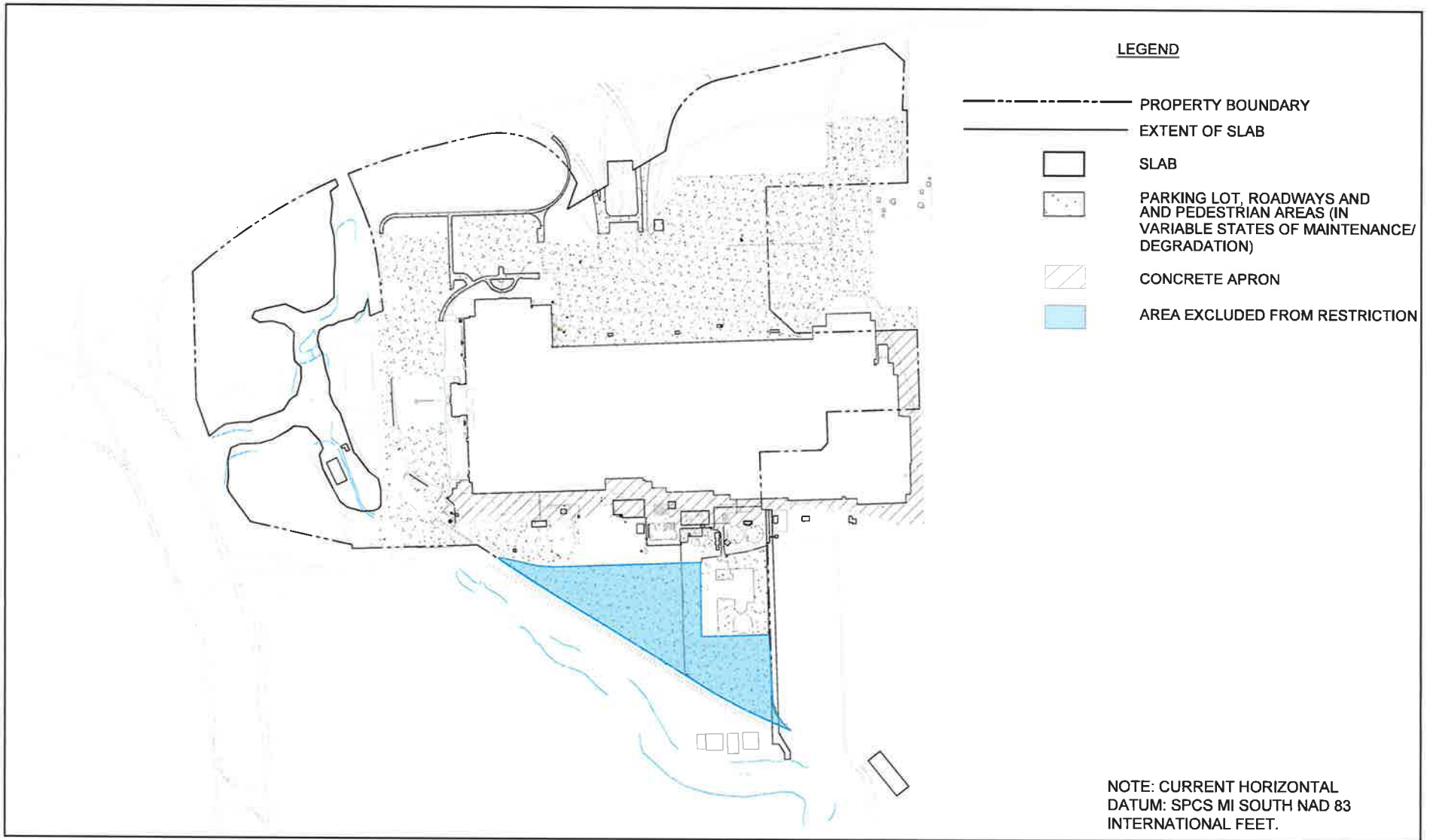
Former Powertrain Plant
Ypsilanti, Michigan

RCRA Restrictive Covenant Monitoring Well Locations

RCRA DRC
Exhibit 4f

EXHIBIT 5

Location and Boundary of Ground Cover



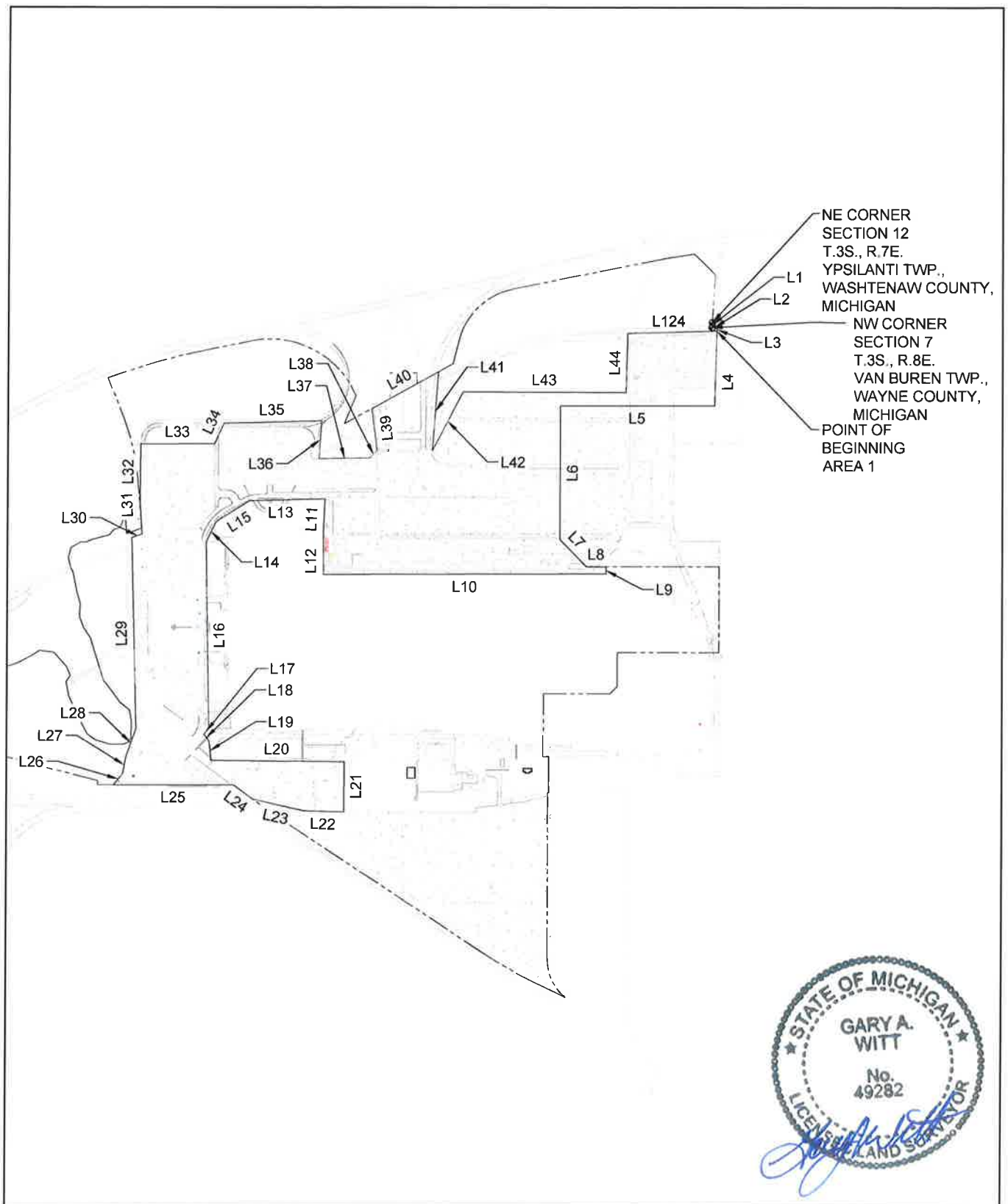
0 500 1000ft



FORMER POWERTRAIN PLANT
YPSILANTI, MICHIGAN
RESTRICTIVE COVENANT
LOCATION AND BOUNDARY OF GROUND COVER

081613-09
Nov 3, 2016

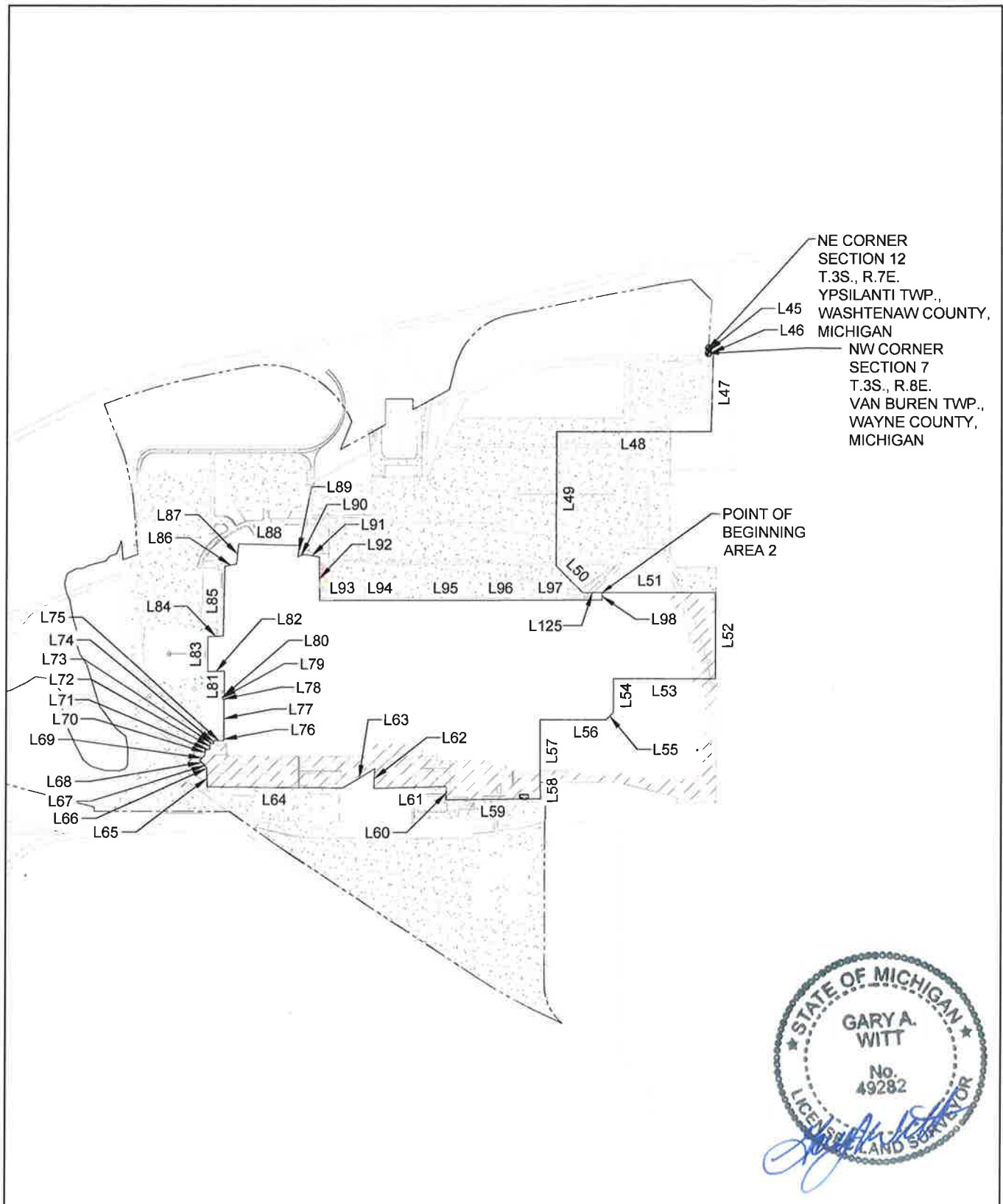
RCRA DRC
EXHIBIT 5



FORMER POWERTRAIN PLANT
YPSILANTI, MICHIGAN
RESTRICTIVE COVENANT
GROUND COVER - AREA 1

081613-09
Nov 3, 2016

RCRA DRC
EXHIBIT 5a



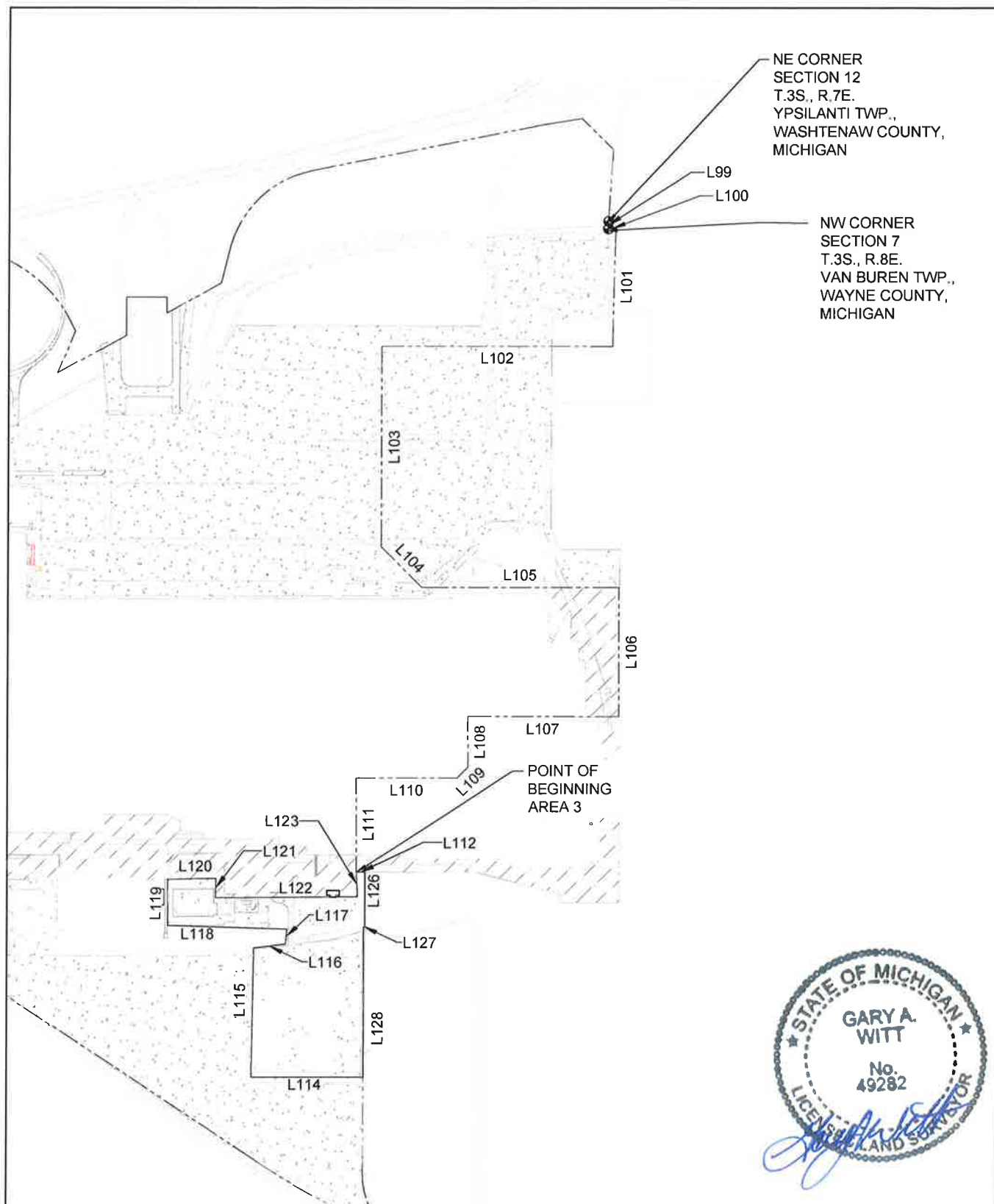
0 450 900ft



FORMER POWERTRAIN PLANT
YPSILANTI, MICHIGAN
RESTRICTIVE COVENANT
GROUND COVER - AREA 2

081613-09
Nov 3, 2016

RCRA DRC
EXHIBIT 5b



0 200 600ft



FORMER POWERTRAIN PLANT
YPSILANTI, MICHIGAN
RESTRICTIVE COVENANT
GROUND COVER - AREA 3

081613-09
Nov 3, 2016

RCRA DRC
EXHIBIT 5c

Parcel Line Table			Parcel Line Table			Parcel Line Table		
Line #	Direction	Length	Line #	Direction	Length	Line #	Direction	Length
L1	S01° 27' 26"W	33.00	L16	S01° 02' 22"E	1245.51	L31	N03° 19' 50"W	227.97
L2	N87° 37' 30"E	33.07	L17	S43° 55' 53"W	50.01	L32	N00° 26' 51"E	371.29
L3	S01° 27' 26"W	24.80	L18	S38° 30' 22"E	60.41	L33	N89° 49' 17"E	496.95
L4	S01° 27' 26"W	500.60	L19	S05° 48' 14"E	128.12	L34	N24° 04' 37"E	151.85
L5	N89° 58' 35"W	1027.30	L20	S89° 29' 18"E	889.85	L35	N88° 34' 21"E	653.50
L6	S00° 01' 25"W	892.33	L21	S00° 16' 27"W	335.39	L36	S03° 51' 03"W	253.22
L7	S44° 58' 35"E	253.84	L22	N88° 08' 02"W	263.06	L37	N89° 14' 47"E	336.66
L8	S89° 58' 35"E	129.96	L23	N77° 19' 03"W	349.81	L38	N41° 33' 22"E	69.10
L9	S00° 05' 34"W	48.52	L24	N54° 34' 09"W	160.56	L39	N06° 50' 27"W	280.42
L10	S89° 51' 21"W	1885.63	L25	N89° 55' 54"W	801.31	L40	N61° 05' 24"E	506.79
L11	N03° 04' 24"E	212.93	L26	N38° 02' 14"E	98.23	L41	S04° 11' 09"W	526.44
L12	N00° 15' 24"W	291.17	L27	N09° 51' 30"E	112.73	L42	N27° 43' 18"E	442.04
L13	S88° 36' 31"W	504.20	L28	N19° 01' 51"E	197.00	L43	S89° 50' 38"E	1088.32
L14	S26° 23' 42"W	154.29	L29	N01° 22' 11"W	1277.08	L44	N01° 33' 11"E	395.41
L15	S58° 09' 43"W	262.53	L30	N70° 26' 54"E	69.24	L124	N88° 32' 39"E	590.55

0 200 600ft



FORMER POWERTRAIN PLANT
YPSILANTI, MICHIGAN
RESTRICTIVE COVENANT
LOCATION AND BOUNDARY OF GROUND COVER

081613-09
Nov 3, 2016

RCRA DRC
EXHIBIT 5d

Parcel Line Table		
Line #	Direction	Length
L45	S01° 27' 26"W	33.00
L46	N87° 37' 30"E	33.07
L47	S01° 27' 26"W	525.40
L48	N89° 58' 35"W	1027.30
L49	S00° 01' 25"W	892.33
L50	S44° 58' 35"E	253.84
L51	S89° 58' 35"E	752.05
L125	S89° 58' 35"E	129.03
L52	DUE SOUTH	574.23
L53	N89° 58' 00"W	673.56
L54	S00° 02' 00"W	224.85
L55	S45° 02' 00"W	69.30
L56	N89° 58' 00"W	443.50
L57	S00° 02' 00"W	418.67
L58	S02° 43' 36"E	108.35
L59	S89° 28' 29"W	632.43
L60	N01° 30' 18"E	87.84
L61	S88° 32' 20"W	479.92
L62	N03° 04' 49"E	130.72

Parcel Line Table		
Line #	Direction	Length
L63	S59° 00' 43"W	249.23
L64	N89° 29' 18"W	907.03
L65	N01° 18' 41"W	113.30
L66	N15° 02' 55"W	19.76
L67	N41° 28' 38"W	26.75
L68	N48° 21' 24"W	33.63
L69	N43° 55' 53"E	50.01
L70	N02° 35' 08"E	37.41
L71	S89° 31' 28"E	31.07
L72	N00° 53' 45"E	42.38
L73	S88° 42' 08"E	23.29
L74	N06° 47' 25"E	19.06
L75	S89° 00' 49"E	66.24
L76	N12° 09' 42"E	18.12
L77	N00° 01' 34"W	258.81
L78	N88° 17' 52"W	9.04
L79	N01° 19' 22"W	18.71
L80	N88° 17' 53"E	10.11

Parcel Line Table		
Line #	Direction	Length
L81	N00° 21' 15"E	168.17
L82	S88° 38' 34"W	112.74
L83	N00° 06' 53"W	232.80
L84	N88° 36' 03"E	105.35
L85	N01° 01' 17"E	466.74
L86	N80° 22' 38"E	80.79
L87	N05° 48' 52"E	134.78
L88	S88° 34' 37"E	403.60
L89	S06° 59' 15"W	76.27
L90	N68° 46' 35"E	45.48
L91	S80° 32' 18"E	102.10
L92	S00° 15' 24"E	291.17
L93	N89° 18' 15"E	186.43
L94	N89° 59' 16"E	444.08
L95	N89° 58' 40"E	416.48
L96	N89° 53' 44"E	319.81
L97	N89° 49' 08"E	518.84
L98	N00° 05' 34"E	48.57

Parcel Line Table		
Line #	Direction	Length
L99	S01° 27' 26"W	33.00
L100	N87° 37' 30"E	33.07
L101	S01° 27' 26"W	525.40
L102	N89° 58' 35"W	1027.30
L103	S00° 01' 25"W	892.33
L104	S44° 58' 35"E	253.84
L105	S89° 58' 35"E	881.05
L106	DUE SOUTH	574.23
L107	N89° 58' 00"W	673.56
L108	S00° 02' 00"W	224.85

Parcel Line Table		
Line #	Direction	Length
L109	S45° 02' 00"W	69.30
L110	N89° 58' 00"W	443.50
L111	S00° 02' 00"W	418.67
L112	DUE EAST	38.38
L126	S00° 08' 45"W	241.25
L127	S77° 57' 35"E	4.93
L128	S00° 03' 01"W	668.65
L114	N89° 56' 07"W	499.07
L115	N00° 57' 10"E	573.62
L116	N82° 29' 56"E	143.56

Parcel Line Table		
Line #	Direction	Length
L117	N04° 50' 53"E	65.28
L118	N88° 13' 26"W	529.47
L119	N00° 37' 39"W	204.94
L120	N88° 32' 20"E	215.91
L121	S01° 30' 18"W	87.84
L122	N89° 28' 29"E	632.43
L123	N02° 43' 36"W	108.35



FORMER POWERTRAIN PLANT
YPSILANTI, MICHIGAN
RESTRICTIVE COVENANT

LOCATION AND BOUNDARY OF GROUND COVER

081613-09
Nov 3, 2016

RCRA DRC

EXHIBIT 5e

AREA 1

Part of Section 7, T3S-R8E, Van Buren Township, Wayne County, Michigan and part of Sections 1 and 12, T3S-R7E, Ypsilanti Township, Washtenaw County, Michigan, more particularly described as follows: Commencing at the Northeast Corner of Section 12, T3S-R7E, Ypsilanti Township, Wayne County, Michigan, thence along the East line of Section 12, S 01°27'26" W, 33.00 feet to the Northwest Corner of Section 7, T3S-R8E, Van Buren Township, Wayne County, Michigan; thence along the North line of Section 7, N 87°37'30" E 33.07 feet; thence along a line parallel to the West line of Section 7, S 01°27'26" W, 24.80 feet, to the POINT OF BEGINNING of the parcel to be described; thence continuing S 01°27'26" W, 500.60 feet; thence N 89°58'35" W, 1027.30 feet; thence S 00°01'25" W, 892.33 feet; thence S 44°58'35" E, 253.84 feet; thence S 89°58'35" E, 128.96 feet; thence S 00°05'34" W, 48.52 feet; thence S 89°51'21" W, 1885.63 feet; thence N 00°15'24" W, 291.17 feet; thence N 03°04'24" E, 212.93 feet; thence S 88°36'31" W, 504.20 feet; thence S 58°09'43" W, 262.53 feet; thence S 26°23'42" W, 154.29 feet; thence S 01°02'22" E, 1245.51 feet; thence S 43°55'53" W, 50.01 feet; thence S 38°30'22" E, 60.41 feet; thence S 05°48'14" E, 128.12 feet; thence S 89°29'18" E, 889.85 feet; thence S 00°16'27" W, 335.39 feet; thence N 88°08'02" W, 263.06 feet; thence N 77°19'03" W, 349.81 feet; thence N 54°34'09" W, 160.56 feet; thence N 89°55'54" W, 801.31 feet; thence N 38°02'14" E, 98.23 feet; thence N 09°51'30" E, 112.73 feet; thence N 19°01'51" E, 197.00 feet; thence N 01°22'11" W, 1277.08 feet; thence N 70°26'54" E, 69.24 feet; thence N 03°19'50" W, 227.97 feet; thence N 00°26'51" E, 371.29 feet; thence N 89°49'17" E, 496.95 feet; thence N 24°04'37" E, 151.85 feet; thence N 88°34'21" E, 653.50 feet; thence S 03°51'03" W, 253.22 feet; thence N 89°14'47" E, 336.66 feet; thence N 41°33'22" E, 69.10 feet; thence N 06°50'27" W, 280.42 feet; thence N 61°05'24" E, 506.79 feet; thence S 04°11'09" W, 526.44 feet; thence N 27°43'18" E, 442.04 feet; thence S 89°50'38" E, 1088.32 feet; thence N 01°33'11" E, 395.41 feet; thence N 88°32'39" E, 590.55 feet to the POINT OF BEGINNING, containing 88.94 acres, more or less.

AREA 2

Part of Section 7, T3S-R8E, Van Buren Township, Wayne County, Michigan and part of Sections 1 and 12, T3S-R7E, Ypsilanti Township, Washtenaw County, Michigan, more particularly described as follows: Commencing at the Northeast Corner of Section 12, T3S-R7E, Ypsilanti Township, Wayne County, Michigan, thence along the East line of Section 12, S 01°27'26" W, 33.00 feet to the Northwest Corner of Section 7, T3S-R8E, Van Buren Township, Wayne County, Michigan; thence along the North line of Section 7, N 87°37'30" E 33.07 feet; thence along a line parallel to the West line of Section 7, S 01°27'26" W, 525.40 feet; thence N 89°58'35" W, 1027.30 feet; thence S 00°01'25" W, 892.33 feet; thence S 44°58'35" E, 253.84 feet; thence S 89°58'35" E, 129.03 feet, to the POINT OF BEGINNING of the parcel to be described; thence continuing S 89°58'35" E, 752.02 feet; thence Due South 574.23 feet; thence N 89°58'00" W, 673.56 feet; thence S 00°02'00" W, 224.85 feet; thence S 45°02'00" W, 69.30 feet; thence N 89°58'00" W, 443.50 feet; thence S 00°02'00" W, 418.67 feet; ; thence S 02°43'36" E, 108.35 feet; thence S 89°28'29" W, 632.43 feet; thence N 01°30'18" E, 87.84 feet; thence S 88°32'20" W, 479.92 feet; thence N 03°04'49" E, 130.72 feet; thence S 59°00'43" W, 249.23 feet; thence N 89°29'18" W, 907.03 feet; thence N 01°18'41" W, 113.30 feet; thence N 15°02'55" W, 19.76 feet; thence N 41°28'38" W, 26.75 feet; thence N 48°21'24" W, 33.63 feet; thence N 43°55'53" E, 50.01 feet; thence N 02°35'08" E, 37.41 feet; thence S 89°31'28" E, 31.07 feet; thence N 00°53'45" E, 42.38 feet; thence S 88°42'08" E, 23.29



FORMER POWERTRAIN PLANT
YPSILANT, MICHIGAN

RESTRICTIVE COVENANT
LOCATION AND BOUNDARY OF GROUND COVER

081613-09
Nov. 2, 2016

RCRA DRC
Exhibit 5f

feet; thence N 06°47'25" E, 19.06 feet; thence S 89°00'49" E, 66.24 feet; thence N 12°09'42" E, 18.12 feet; thence N 00°01'34" W, 258.81 feet; thence N 88°17'52" W, 9.04 feet; thence N 01°19'22" W, 18.71 feet; thence N 88°17'53" E, 10.11 feet; thence N 00°21'15" E, 168.17 feet; thence S 88°38'34" W, 112.74 feet; thence N 00°06'53" W, 232.80 feet; thence N 88°36'03" E, 105.35 feet; thence N 01°01'17" E, 466.74 feet; thence N 80°22'38" E, 80.79 feet; thence N 05°48'52" E, 134.78 feet; thence S 88°34'37" E, 403.60 feet; thence S 06°59'15" W, 76.27 feet; thence N 68°46'35" E, 45.48 feet; thence S 80°32'18" E, 102.10 feet; thence S 00°15'24" E, 291.17 feet; thence N 89°18'15" E, 186.43 feet; thence N 89°59'16" E, 444.08 feet; thence N 89°58'40" E, 416.48 feet; thence N 89°53'44" E, 319.81 feet; thence N 89°49'08" E, 518.84 feet; thence N 00°05'34" E, 39.05 feet; thence continuing N 00°05'34" E, 9.52 feet to the POINT OF BEGINNING, containing 85.47 acres, more or less.

AREA 3

Part of Section 7, T3S-R8E, Van Buren Township, Wayne County, Michigan and part of Sections 1 and 12, T3S-R7E, Ypsilanti Township, Washtenaw County, Michigan, more particularly described as follows: Commencing at the Northeast Corner of Section 12, T3S-R7E, Ypsilanti Township, Wayne County, Michigan, thence along the East line of Section 12, S 01°27'26" W, 33.00 feet to the Northwest Corner of Section 7, T3S-R8E, Van Buren Township, Wayne County, Michigan; thence along the North line of Section 7, N 87°37'30" E 33.07 feet; thence along a line parallel to the West line of Section 7, S 01°27'26" W, 525.40 feet; thence N 89°58'35" W, 1027.30 feet; thence S 00°01'25" W, 892.33 feet; thence S 44°58'35" E, 253.84 feet; thence S 89°58'35" E, 881.05 feet; thence Due South 574.23 feet; thence N 89°58'00" W, 673.56 feet; thence S 00°02'00" W, 224.85 feet; thence S 45°02'00" W, 69.30 feet; thence N 89°58'00" W, 443.50 feet; thence S 00°02'00" W, 418.67 feet, to the POINT OF BEGINNING of the parcel to be described; thence Due East 38.38 feet; thence S 00°08'45" W, 241.25 feet; thence S 77°57'35" W, 4.93 feet; thence along the easterly line of an existing concrete roadway, S 00°03'01" W, 668.65 feet; thence N 89°56'07" W, 499.07 feet; thence N 00°57'10" E, 573.62 feet; thence N 82°29'56" E, 143.56 feet; thence N 04°50'53" E, 65.28 feet; thence N 88°13'26" W, 529.47 feet; thence N 00°37'39" W, 204.94 feet; thence N 88°32'20" E, 215.91 feet; thence S 01°30'18" W, 87.84 feet; thence N 89°28'29" E, 632.43 feet; thence N 02°43'36" W, 108.35 feet to the POINT OF BEGINNING, containing 10.49 acres, more or less.



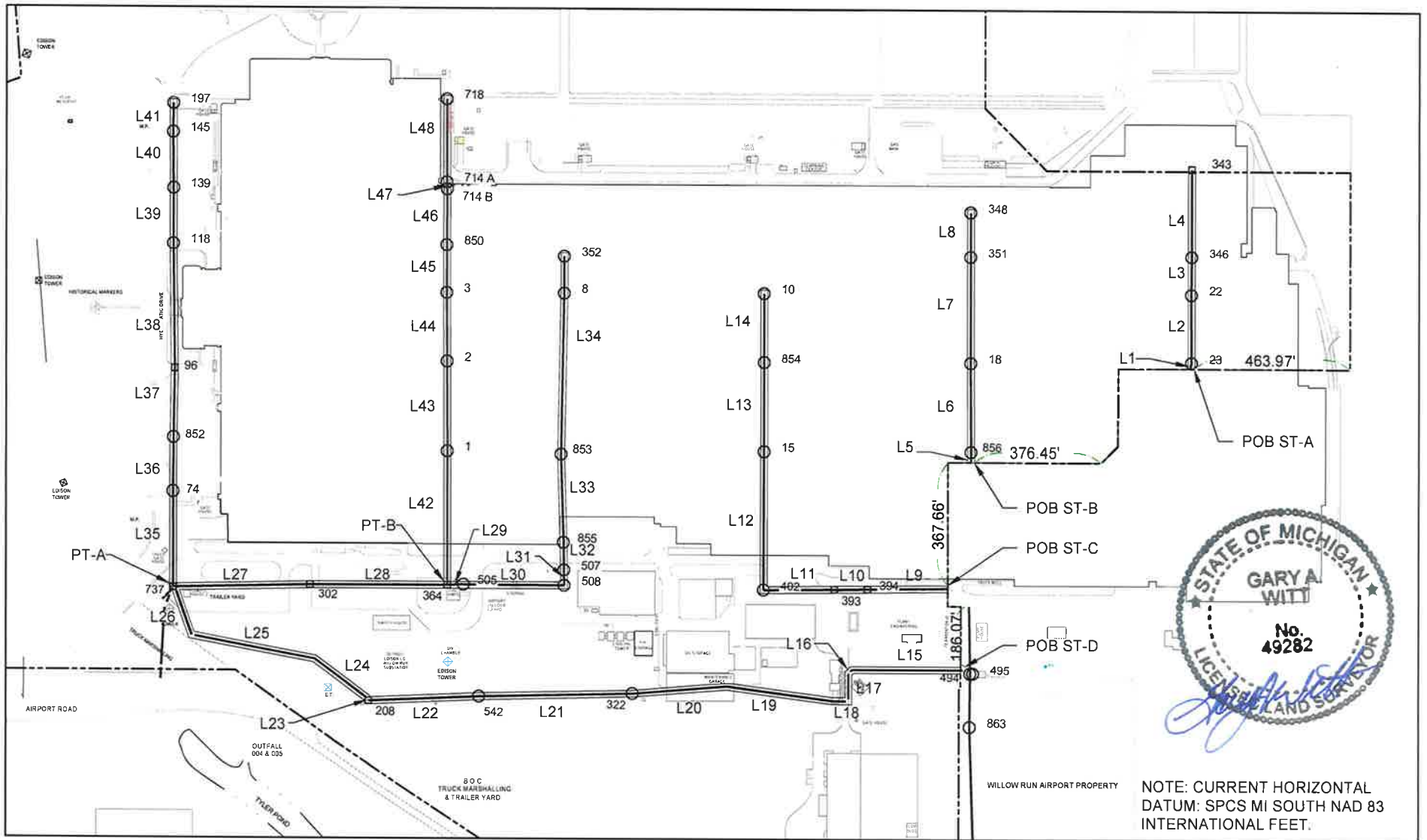
FORMER POWERTRAIN PLANT
YPSILANT, MICHIGAN

RESTRICTIVE COVENANT
LOCATION AND BOUNDARY OF GROUND COVER

081613-09
Nov. 2, 2016

RCRA DRC
Exhibit 5f

EXHIBIT 6
STORM SEWER AREAS



0 200 400ft



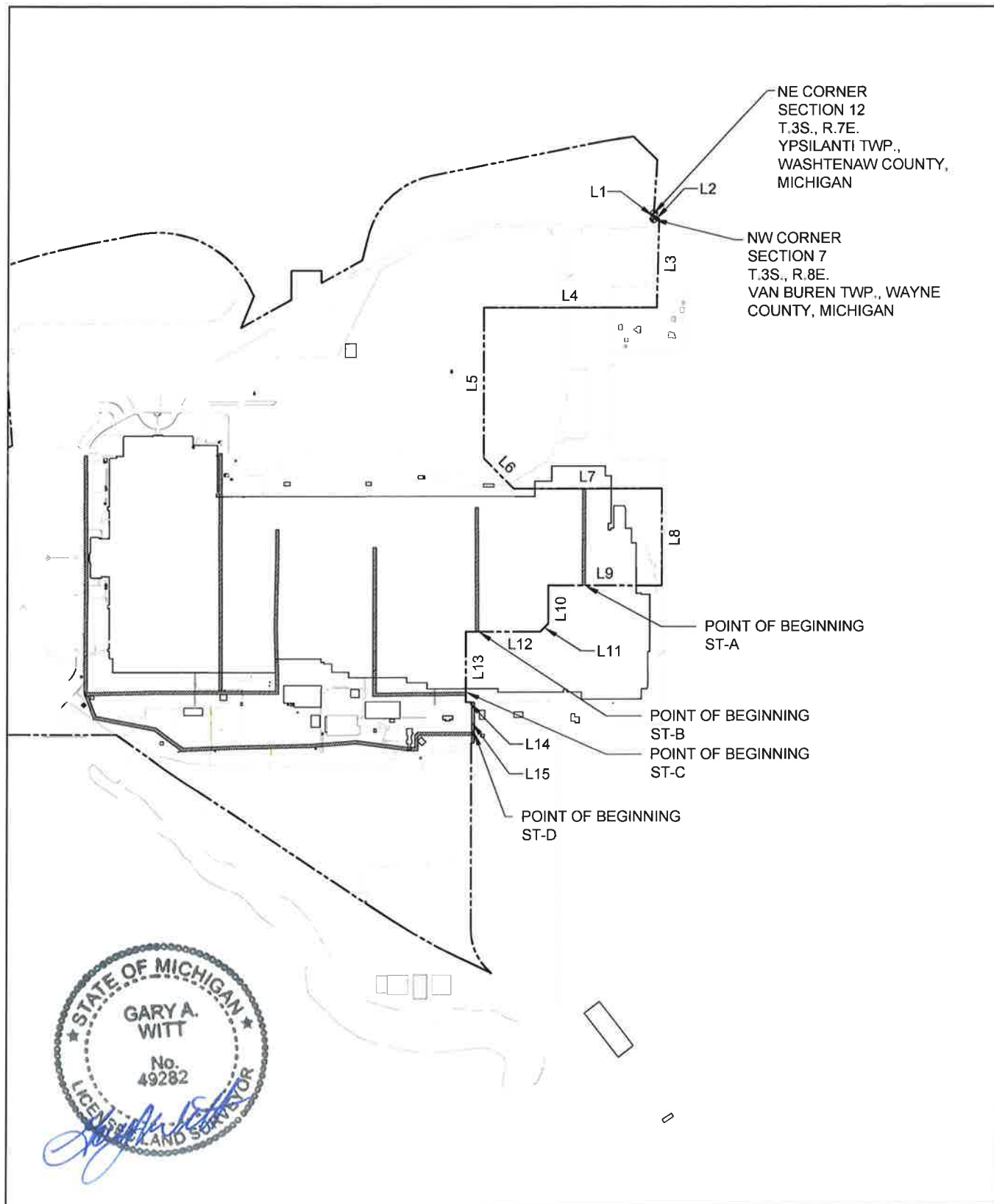
FORMER POWERTRAIN PLANT
YPSILANTI, MICHIGAN
RESTRICTIVE COVENANT
STORM SEWER LINES AND MANHOLES

081613-09

Nov 2, 2016

RCRA DRC

EXHIBIT 6a



0 400 800ft



FORMER POWERTRAIN PLANT
YPSILANTI, MICHIGAN

RESTRICTIVE COVENANT

LOCATION OF STORM SEWER LINES AND MANHOLES

081613-09
Nov 3, 2016

RCRA DRC

EXHIBIT 6b

Parcel Line Table		
Line #	Direction	Length
L1	N1° 27' 26"E	33.00
L2	S87° 37' 30"W	33.07
L3	N1° 27' 26"E	525.40
L4	S89° 58' 35"E	1027.30
L5	N0° 01' 25"E	892.33
L6	N44° 58' 35"W	253.84
L7	N89° 58' 35"W	881.05
L8	N0° 00' 03"W	574.21
L9	S89° 58' 05"E	673.57
L10	N0° 02' 00"E	224.85
L11	N45° 02' 00"E	69.30
L12	S89° 58' 00"E	443.50
L13	N0° 02' 00"E	418.67
L14	N90° 00' 00"W	38.38
L15	N0° 08' 45"E	241.25

Parcel Line ST-A Table		
Line #	Direction	Length
L1	N11° 17' 47"E	17.99
L2	N00° 07' 20"W	198.86
L3	N00° 26' 35"E	110.25
L4	N00° 01' 55"E	253.73

Parcel Line ST-B Table		
Line #	Direction	Length
L5	N00° 49' 14"E	30.54
L6	N00° 20' 37"W	257.61
L7	N00° 04' 39"W	310.07
L8	N00° 04' 05"W	128.86

Parcel Line ST-C Table		
Line #	Direction	Length
L9	S89° 19' 32"W	233.20
L10	S89° 33' 59"W	96.05
L11	S89° 23' 14"W	205.46
L12	N00° 10' 34"E	402.88
L13	N00° 01' 31"W	257.77
L14	N00° 01' 34"W	201.57

Parcel Line ST-D Table		
Line #	Direction	Length
L15	S89° 58' 21"W	314.79
L16	S44° 58' 21"W	15.34
L17	S00° 01' 39"E	80.27
L18	S89° 58' 21"W	42.87
L19	N82° 19' 51"W	312.73
L20	S85° 26' 31"W	274.64
L21	S88° 49' 50"W	445.63
L22	S87° 33' 56"W	314.58
L23	N53° 12' 35"W	202.27
L24	N79° 16' 53"E	362.42
L25	N21° 03' 42"W	149.75
L26	N88° 45' 42"E	396.48
L27	N89° 57' 38"E	397.74
L28	N87° 50' 42"E	44.37
L29	S89° 38' 07"E	294.56
L30	N00° 57' 51"E	45.23
L31	N00° 50' 38"W	80.34
L32	N01° 41' 32"W	256.60
L33	N01° 03' 44"W	467.28
L34	N00° 02' 15"E	108.16
L35	N00° 03' 16"E	278.57
L36	N00° 17' 41"E	156.50
L37	N00° 52' 29"E	199.58
L38	N00° 34' 49"W	364.57
L39	N00° 01' 18"E	158.84
L40	N00° 26' 28"W	160.46
L41	N00° 26' 19"E	83.49
L42	N00° 04' 28"W	389.61
L43	N00° 10' 11"W	259.14
L44	N00° 27' 15"W	200.98
L45	N00° 16' 02"E	139.51
L46	N00° 15' 31"E	159.59
L47	N02° 21' 38"W	20.25
L48	N00° 01' 03"E	239.52



FORMER POWERTRAIN PLANT
YPSILANTI, MICHIGAN

RESTRICTIVE COVENANT
STORM SEWER LINES AND MANHOLES

081613-09
Nov 3, 2016

RCRA DRC
EXHIBIT 6c

Storm Sewer

Storm Line A

20 foot wide storm sewer easement laying 10 feet on each side of the following described centerline.

Part of Section 7, T3S-R8E, Van Buren Township, Wayne County, Michigan and part of Sections 1 and 12, T3S-R7E, Ypsilanti Township, Washtenaw County, Michigan, more particularly described as follows: Commencing at the Northeast Corner of Section 12, T3S-R7E, Ypsilanti Township, Wayne County, Michigan, thence along the East line of Section 12, S 01°27'26" W, 33.00 feet to the Northwest Corner of Section 7, T3S-R8E, Van Buren Township, Wayne County, Michigan; thence along the North line of Section 7, N 87°37'30" E 33.07 feet; thence along a line parallel to the West line of Section 7, S 01°27'26" W, 525.40 feet; thence N 89°58'35" W, 1027.30 feet; thence S 00°01'25" W, 892.33 feet; thence S 44°58'35" E, 253.84 feet; thence S 89°58'35" E, 881.05 feet; thence due South 574.23 feet; thence N 89°58'00" W, 463.97 feet to the POINT OF BEGINNING, of the line to be described; thence N 11°17'47" E, 17.99 feet; thence N 00°07'20" W, 198.86 feet; thence N 00°26'35" E, 110.25 feet; thence N 00°01'55" W, 253.73 feet to the POINT OF TERMINUS.

Storm Line B

20 foot wide storm sewer easement laying 10 feet on each side of the following described centerline.

Part of Section 7, T3S-R8E, Van Buren Township, Wayne County, Michigan and part of Sections 1 and 12, T3S-R7E, Ypsilanti Township, Washtenaw County, Michigan, more particularly described as follows: Commencing at the Northeast Corner of Section 12, T3S-R7E, Ypsilanti Township, Wayne County, Michigan, thence along the East line of Section 12, S 01°27'26" W, 33.00 feet to the Northwest Corner of Section 7, T3S-R8E, Van Buren Township, Wayne County, Michigan; thence along the North line of Section 7, N 87°37'30" E 33.07 feet; thence along a line parallel to the West line of Section 7, S 01°27'26" W, 525.40 feet; thence N 89°58'35" W, 1027.30 feet; thence S 00°01'25" W, 892.33 feet; thence S 44°58'35" E, 253.84 feet; thence S 89°58'35" E, 881.05 feet; thence due South 574.23 feet; thence N 89°58'00" W, 673.56 feet; thence S 00°02'00" W, 224.85 feet; thence S 45°02'00" W, 69.30 feet; thence N 89°58'00" W, 376.45 feet to the POINT OF BEGINNING, of the line to be described; thence N 00°49'14" E, 30.54 feet; thence N 00°20'37" W, 257.61 feet; thence N 00°04'39" W, 310.07 feet; thence N 00°04'05" W, 128.86 feet to the POINT OF TERMINUS.

Storm Line C

20 foot wide storm sewer easement laying 10 feet on each side of the following described centerline.

Part of Section 7, T3S-R8E, Van Buren Township, Wayne County, Michigan and part of Sections 1 and 12, T3S-R7E, Ypsilanti Township, Washtenaw County, Michigan, more particularly described as follows: Commencing at the Northeast Corner of Section 12, T3S-R7E, Ypsilanti Township, Wayne County, Michigan, thence along the East line of Section 12, S 01°27'26" W, 33.00 feet to the Northwest Corner of Section 7, T3S-R8E, Van Buren Township, Wayne County, Michigan; thence along the North line of Section 7, N 87°37'30" E 33.07 feet; thence along a line parallel to the West line of Section 7, S 01°27'26" W, 525.40 feet;



FORMER POWERTRAIN PLANT
YPSILANT, MICHIGAN

RESTRICTIVE COVENANT
LOCATION OF STORM SEWER LINES AND MANHOLES

081613-09
Oct. 31, 2016

RCRA DRC
Exhibit 6d

thence N 89°58'35" W, 1027.30 feet; thence S 00°01'25" W, 892.33 feet; thence S 44°58'35" E, 253.84 feet; thence S 89°58'35" E, 881.05 feet; thence due South 574.23 feet; thence N 89°58'00" W, 673.56 feet; thence S 00°02'00" W, 224.85 feet; thence S 45°02'00" W, 69.30 feet; thence N 89°58'00" W, 443.50 feet; thence S 00°02'00" W, 367.66 feet; to the POINT OF BEGINNING, of the line to be described; thence S 89°19'32" W, 233.20 feet; thence S 89°33'59" W, 96.05 feet; thence S 89°23'14" W, 205.46 feet; thence N 00°10'34" E, 402.88 feet; thence N 00°01'31" W, 257.77 feet; thence N 00°01'34" W, 201.57 feet to the POINT OF TERMINUS.

Storm Line D

20 foot wide storm sewer easement laying 10 feet on each side of the following described centerline.

Part of Section 7, T3S-R8E, Van Buren Township, Wayne County, Michigan and part of Sections 1 and 12, T3S-R7E, Ypsilanti Township, Washtenaw County, Michigan, more particularly described as follows: Commencing at the Northeast Corner of Section 12, T3S-R7E, Ypsilanti Township, Wayne County, Michigan, thence along the East line of Section 12, S 01°27'26" W, 33.00 feet to the Northwest Corner of Section 7, T3S-R8E, Van Buren Township, Wayne County, Michigan; thence along the North line of Section 7, N 87°37'30" E 33.07 feet; thence along a line parallel to the West line of Section 7, S 01°27'26" W, 525.40 feet; thence N 89°58'35" W, 1027.30 feet; thence S 00°01'25" W, 892.33 feet; thence S 44°58'35" E, 253.84 feet; thence S 89°58'35" E, 881.05 feet; thence due South 574.23 feet; thence N 89°58'00" W, 673.56 feet; thence S 00°02'00" W, 224.85 feet; thence S 45°02'00" W, 69.30 feet; thence N 89°58'00" W, 443.50 feet; thence S 00°02'00" W, 418.67 feet; thence Due East 38.38 feet; thence S 00°08'45" W, 186.07 feet to the POINT OF BEGINNING, of the line to be described; thence S 89°58'21" W, 314.79 feet; thence S 44°58'21" W, 15.34 feet; thence S 00°01'39" E, 80.27 feet; thence S 89°58'21" W, 42.87 feet; thence N 82°19'51" W, 312.73 feet; thence S 85°26'31" W, 274.64 feet; thence S 88°49'50" W, 445.63 feet; thence S 87°33'56" W, 314.58 feet; thence N 53°12'35" W, 202.27 feet; thence N 79°16'53" W, 362.42 feet; thence N 21°03'42" W, 149.75 feet to Point A; thence continuing N 88°45'42" E, 396.48 feet; thence N 89°57'38" E, 397.74 feet to Point B; thence continuing N 87°50'42" E, 44.37 feet; thence S 89°38'07" E, 294.56 feet; thence N 00°57'51" W, 45.23 feet; thence N 00°50'38" W, 80.34 feet; thence N 01°41'32" W, 256.60 feet; thence N 01°03'44" E, 467.28 feet; thence N 00°02'15" E, 108.16 feet to the POINT OF TERMINUS.

Thence continuing from POINT A, N 00°03'16" W, 278.57 feet; thence N 00°17'41" E, 156.50 feet; thence N 00°52'29" E, 199.58 feet; thence N 00°34'49" W, 364.57 feet; thence N 00°01'18" E, 158.84 feet; thence N 00°26'28" W, 160.46 feet; thence N 00°26'19" E, 83.49 feet to the POINT OF TERMINUS.

Thence continuing from POINT B, N 00°04'28" W, 389.61 feet; thence N 00°10'11" W, 259.14 feet; thence N 00°27'15" W, 200.98 feet; thence N 00°16'02" E, 139.51 feet; thence N 00°15'31" E, 159.59 feet; thence N 02°21'38" W, 20.25 feet; thence N 00°01'03" E, 239.52 feet to the POINT OF TERMINUS.



FORMER POWERTRAIN PLANT
YPSILANT, MICHIGAN

RESTRICTIVE COVENANT
LOCATION OF STORM SEWER LINES AND MANHOLES

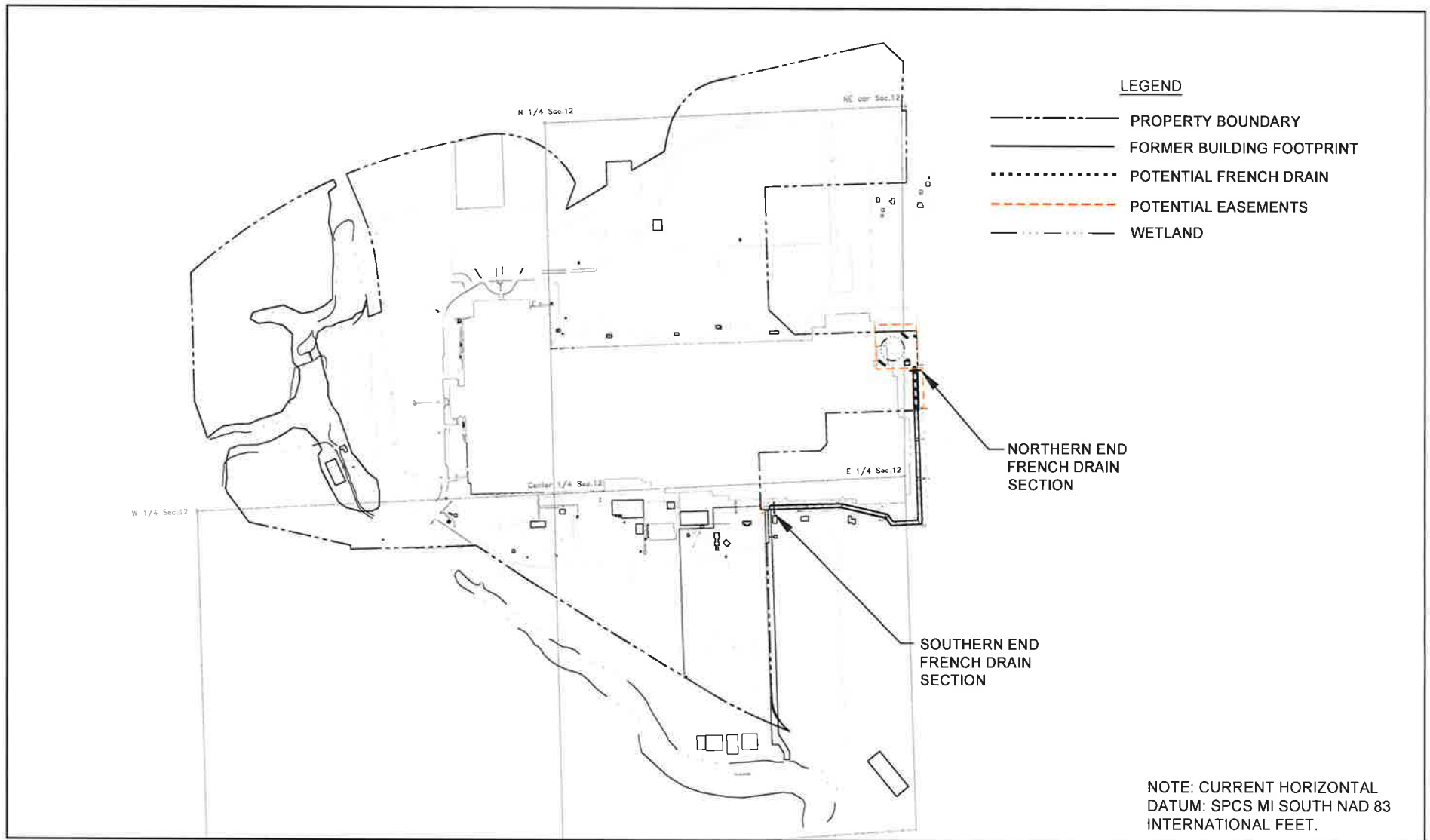


081613-09
Oct. 31, 2016

RCRA DRC
Exhibit 6d

EXHIBIT 7

Groundwater Management System



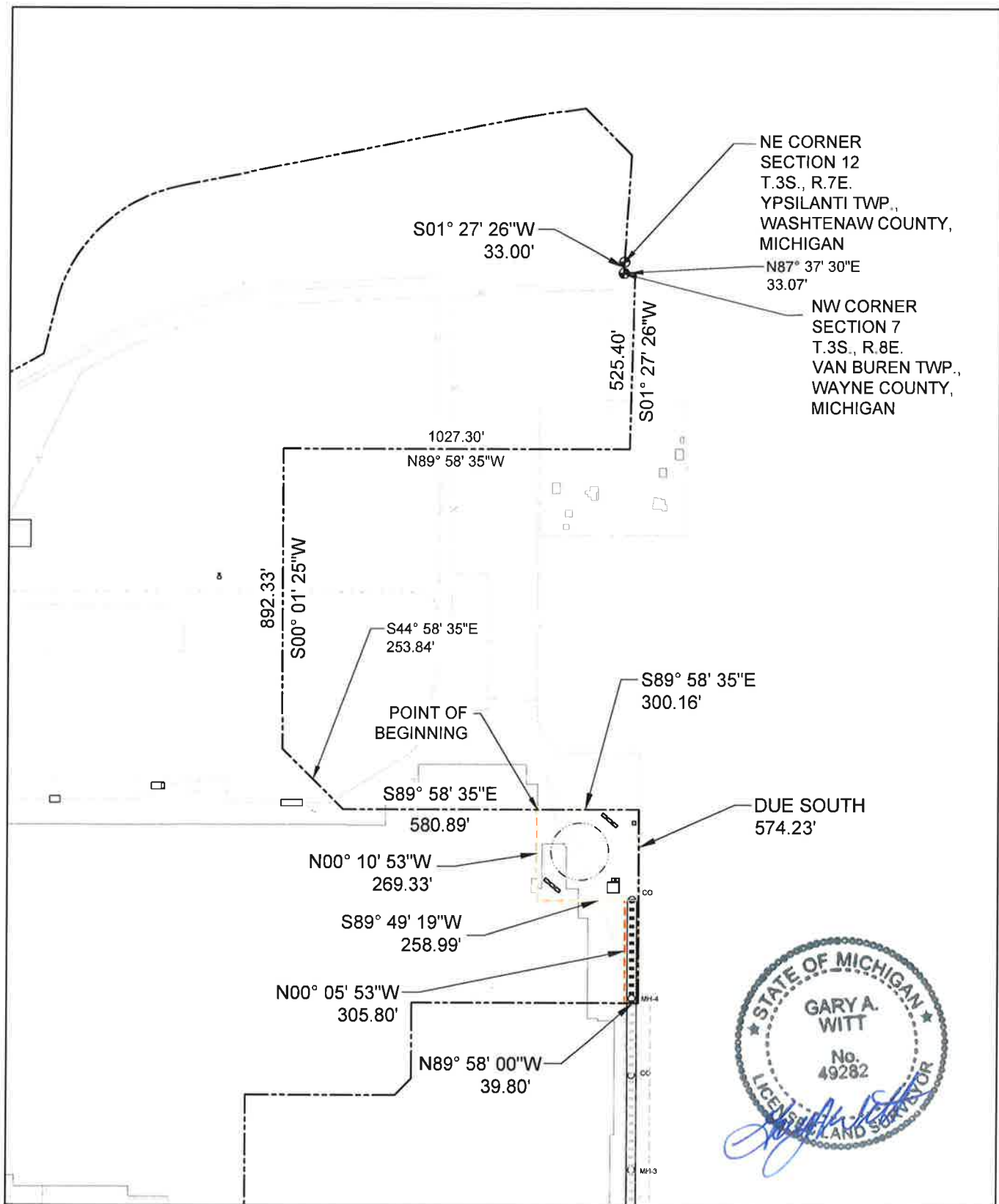
0 500 1000ft



FORMER POWERTRAIN PLANT
YPSILANTI, MICHIGAN
RESTRICTIVE COVENANT
LOCATION OF GROUNDWATER MANAGEMENT SYSTEM

081613-09
Oct 28, 2016

RCRA DRC
EXHIBIT 7



FORMER POWERTRAIN PLANT
YPSILANTI, MICHIGAN
RESTRICTIVE COVENANT
LOCATION OF GROUNDWATER MANAGEMENT SYSTEM EXHIBIT 7a

081613-09
Nov 1, 2016

RCRA DRC

GROUNDWATER MANAGEMENT

Part of Section 7, T3S-R8E, Van Buren Township, Wayne County, Michigan and part of Sections 1 and 12, T3S-R7E, Ypsilanti Township, Washtenaw County, Michigan, more particularly described as follows: Commencing at the Northeast Corner of Section 12, T3S-R7E, Ypsilanti Township, Wayne County, Michigan, thence along the East line of Section 12, S 01°27'26" W, 33.00 feet to the Northwest Corner of Section 7, T3S-R8E, Van Buren Township, Wayne County, Michigan; thence along the North line of Section 7, N 87°37'30" E 33.07 feet; thence along a line parallel to the West line of Section 7, S 01°27'26" W, 525.40 feet; thence N 89°58'35" W, 1027.30 feet; thence S 00°01'25" W, 892.33 feet; thence S 44°58'35" E, 253.84 feet; thence S 89°58'35" E, 580.89 feet to the POINT OF BEGINNING of the parcel to be described; thence continuing S 89°58'35" E, 300.16 feet; thence due South, 574.23 feet; thence N 89°58'00" W, 39.80 feet; thence N 00°05'53" W, 305.81 feet; thence S 89°49'19" W, 258.99 feet; thence N 00°10'53" W, 269.33 feet to the POINT OF BEGINNING, containing 2.13 acres, more or less.



FORMER POWERTRAIN PLANT
YPSILANT, MICHIGAN

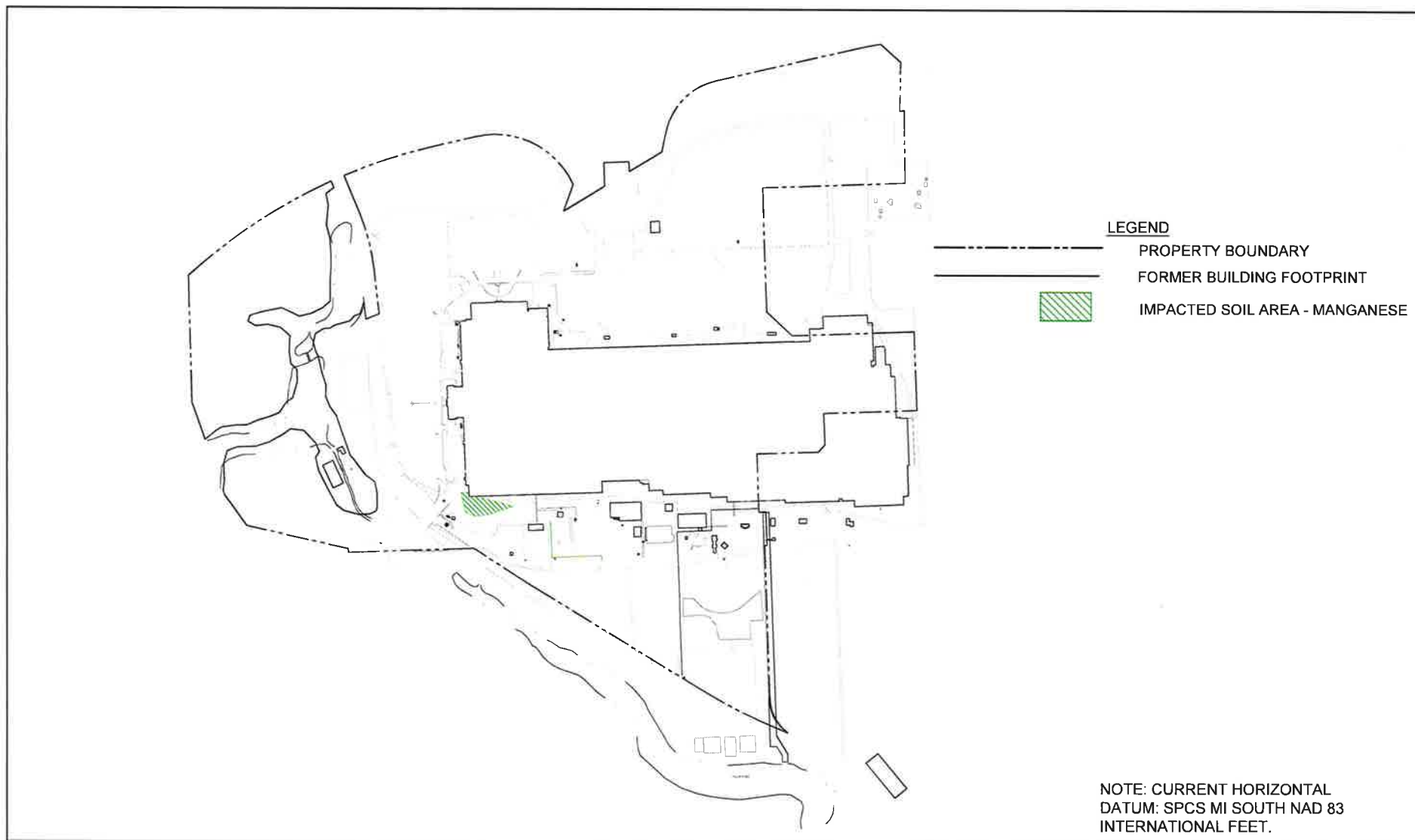
RESTRICTIVE COVENANT
LOCATION OF GROUNDWATER MANAGEMENT SYSTEM

081613-09
Oct. 31, 2016

RCRA DRC
Exhibit 7b

EXHIBIT 8

Managanese Contaminated Soils



0 500 1000ft

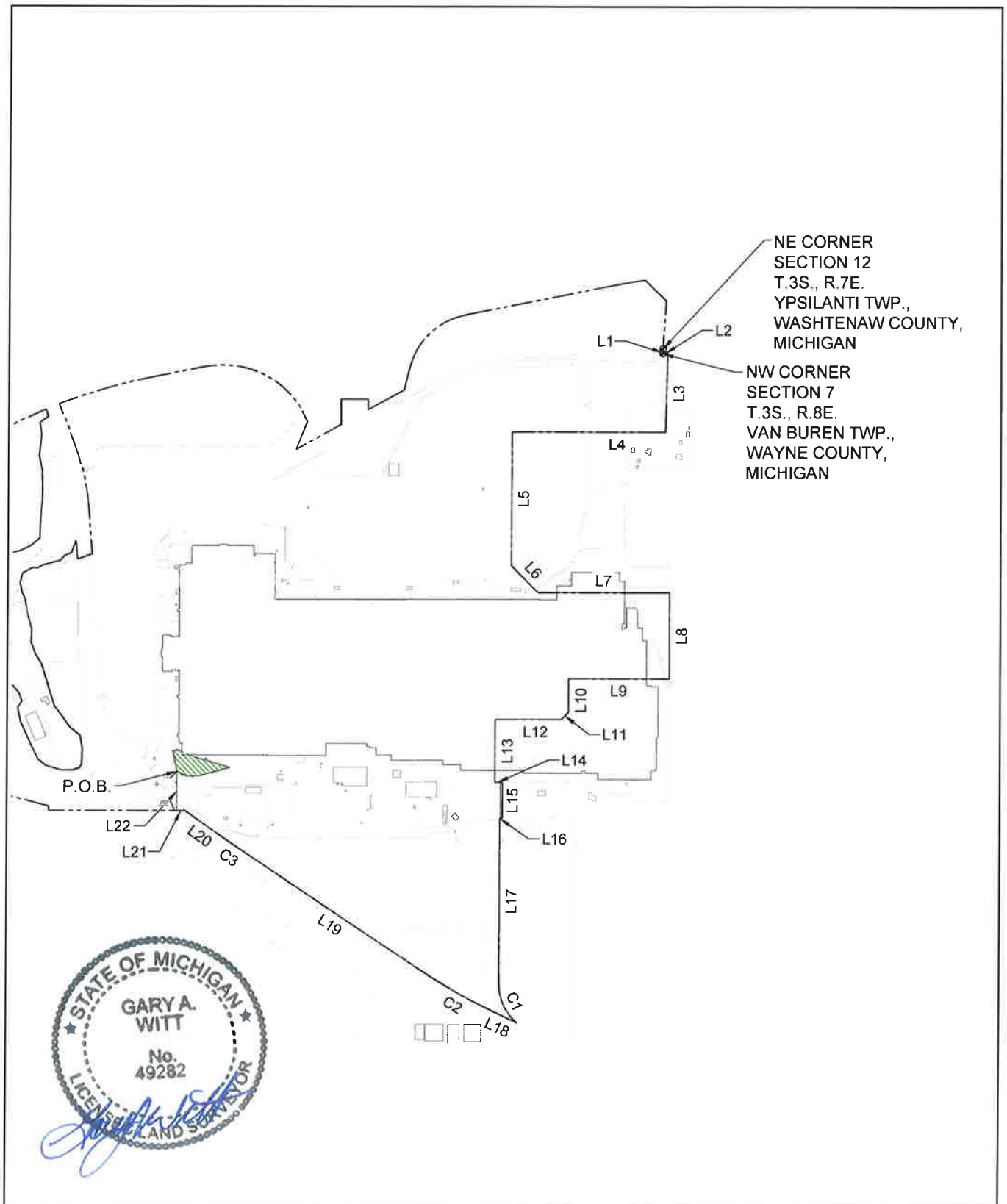


FORMER POWERTRAIN PLANT
YPSILANTI, MICHIGAN

RESTRICTIVE COVENANT
LOCATION OF MANGANESE CONTAMINATED SOILS

081613-09
Oct 28, 2016

RCRA DRC
EXHIBIT 8

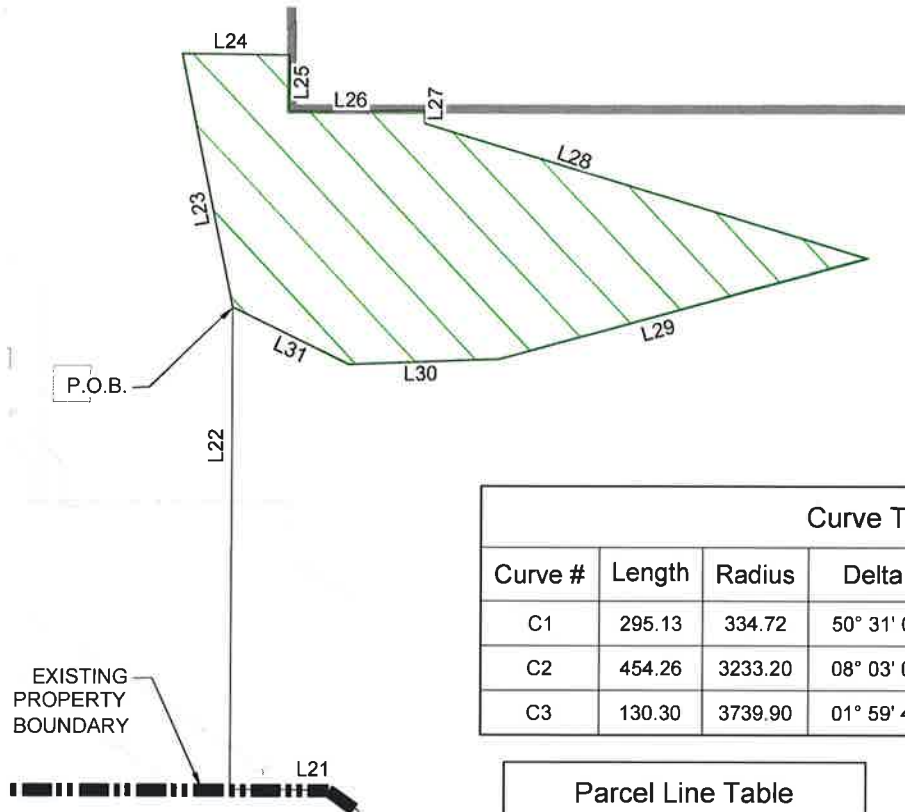


FORMER POWERTRAIN PLANT
YPSILANTI, MICHIGAN

RESTRICTIVE COVENANT
LOCATION OF MANGANESE CONTAMINATED SOILS

081613-09
Nov 1, 2016

RCRA DRC
EXHIBIT 8a



Curve Table

Curve #	Length	Radius	Delta	Chord Direction	Chord Len
C1	295.13	334.72	50° 31' 07"	S25° 12' 32"E	285.66
C2	454.26	3233.20	08° 03' 00"	N60° 35' 25"W	453.89
C3	130.30	3739.90	01° 59' 46"	N55° 34' 02"W	130.29

Parcel Line Table

Line #	Direction	Length
L1	S01° 27' 26"W	33.00
L2	N87° 37' 30"E	33.07
L3	S01° 27' 26"W	525.40
L4	N89° 58' 35"W	1027.30
L5	S00° 01' 25"W	892.33
L6	S44° 58' 35"E	253.84
L7	S89° 58' 35"E	881.05
L8	DUE SOUTH	574.23
L9	N89° 58' 00"W	673.56
L10	S00° 02' 00"W	224.85
L11	S45° 02' 00"W	69.30
L12	N89° 58' 00"W	443.50
L13	S00° 02' 00"W	418.67
L14	DUE EAST	38.38
L15	S00° 08' 45"W	241.25
L16	S77° 57' 35"W	4.93

Parcel Line Table

Line #	Direction	Length
L17	S00° 03' 01"W	1102.74
L18	N64° 36' 55"W	204.04
L19	N56° 33' 35"W	1484.43
L20	N54° 34' 09"W	359.48
L21	N89° 55' 54"W	54.68
L22	N00° 04' 06"E	262.67
L23	N11° 22' 14"W	141.09
L24	S89° 17' 30"E	58.30
L25	S00° 37' 23"W	30.73
L26	N89° 40' 55"E	74.75
L27	S02° 04' 16"E	7.02
L28	S73° 07' 30"E	252.30
L29	S74° 39' 12"W	207.88
L30	S87° 53' 04"W	82.26
L31	N64° 06' 35"W	71.04



FORMER POWERTRAIN PLANT
YPSILANTI, MICHIGAN

RESTRICTIVE COVENANT
LOCATION OF MANGANESE CONTAMINATED SOILS

081613-09
Nov 1, 2016

RCRA DRC
EXHIBIT 8b

Manganese

Part of Section 7, T3S-R8E, Van Buren Township, Wayne County, Michigan and part of Sections 1 and 12, T3S-R7E, Ypsilanti Township, Washtenaw County, Michigan, more particularly described as follows: Commencing at the Northeast Corner of Section 12, T3S-R7E, Ypsilanti Township, Wayne County, Michigan, thence along the East line of Section 12, S 01°27'26" W, 33.00 feet to the Northwest Corner of Section 7, T3S-R8E, Van Buren Township, Wayne County, Michigan; thence along the North line of Section 7, N 87°37'30" E 33.07 feet; thence along a line parallel to the West line of Section 7, S 01°27'26" W, 525.40 feet; thence N 89°58'35" W, 1027.30 feet; thence S 00°01'25" W, 892.33 feet; thence S 44°58'35" E, 253.84 feet; thence S 89°58'35" E, 881.05 feet; thence due South 574.23 feet; thence N 89°58'00" W, 673.56 feet; thence S 00°02'00" W, 224.85 feet; thence S 45°02'00" W, 69.30 feet; thence N 89°58'00" W, 443.50 feet; thence S 00°02'00" W, 418.67 feet; thence Due East 38.38 feet; thence S 00°08'45" W, 241.25 feet; thence S 77°57'35" W, 4.93 feet; thence along the easterly line of an existing concrete roadway, S 00°03'01" W, 1102.74 feet; thence along the easterly edge of roadway, along arc of a curve, concave to the Northeast, having a radius of 334.72 feet, a central angle of 50°31'07", an arc distance of 295.13 feet (chord bearing S 25°12'33" E, 285.66 feet); thence N 64°36'55" W, along a line not tangent to the foregoing curve, 204.04 feet to a point of curve; thence along the arc of a curve concave to the Northeast, having a radius of 3233.20 feet, a central angle of 08°03'00", an arc distance of 454.26 feet (chord bearing N 60°35'25" W, 453.89 feet) to a point of tangent; thence N 56°33'55" W, 1484.43 feet to a point of curve; thence along the arc of a curve, concave to the Northeast, having a radius of 3739.90 feet, a central angle of 01°59'46", an arc distance of 130.30 feet (chord bearing N 55°34'02" W, 130.29 feet) to a point of tangent; thence N 54°34'09" W, 359.48 feet to a point on the southerly line of the former general motors corporation, hydra-matic division, Willow Run plant property; thence along property line, N 89°55'54" W, 54.68 feet; thence N 00°04'06" E, 262.67 feet, to the POINT OF BEGINNING of the parcel to be described; thence N 11°22'14" W, 141.09 feet; thence S 89°17'30" E, 58.30 feet; thence S 00°37'23" W, 30.73 feet; thence N 89°40'55" E, 74.75 feet; thence S 02°04'16" E, 7.02 feet; thence S 73°07'30" E, 252.30 feet; thence S 74°39'12" W, 207.88 feet; thence S 87°53'04" W, 82.26 feet; thence N 64°06'35" W, 71.04 feet to the POINT OF BEGINNING, containing 0.76 acres, more or less.



FORMER POWERTRAIN PLANT
YPSILANT, MICHIGAN

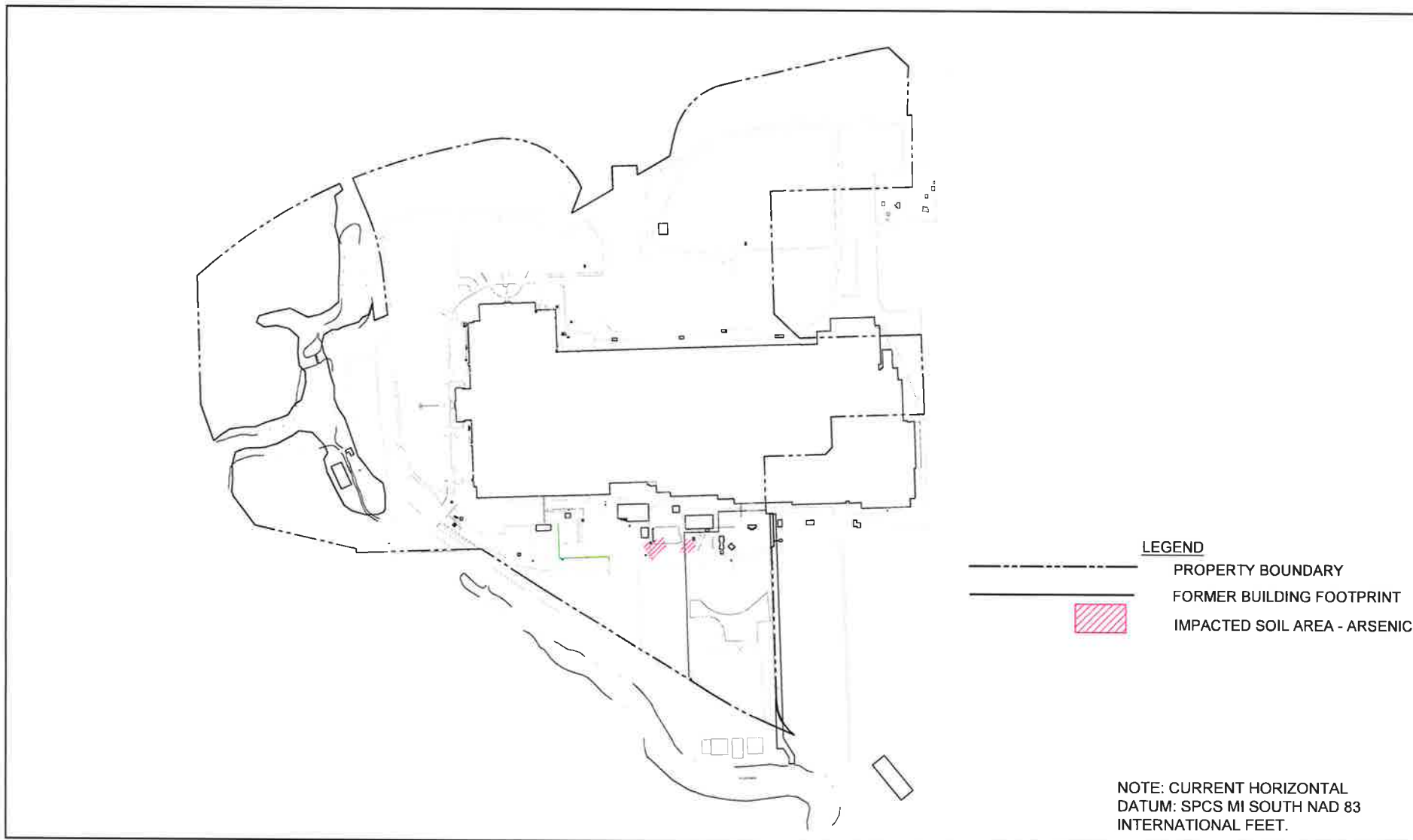
RESTRICTIVE COVENANT
LOCATION OF MANGANESE CONTAMINATED SOILS

081613-09
Oct. 31, 2016

RCRA DRC
Exhibit 8C

EXHIBIT 9

Arsenic Contaminated Soils



0 500 1000ft

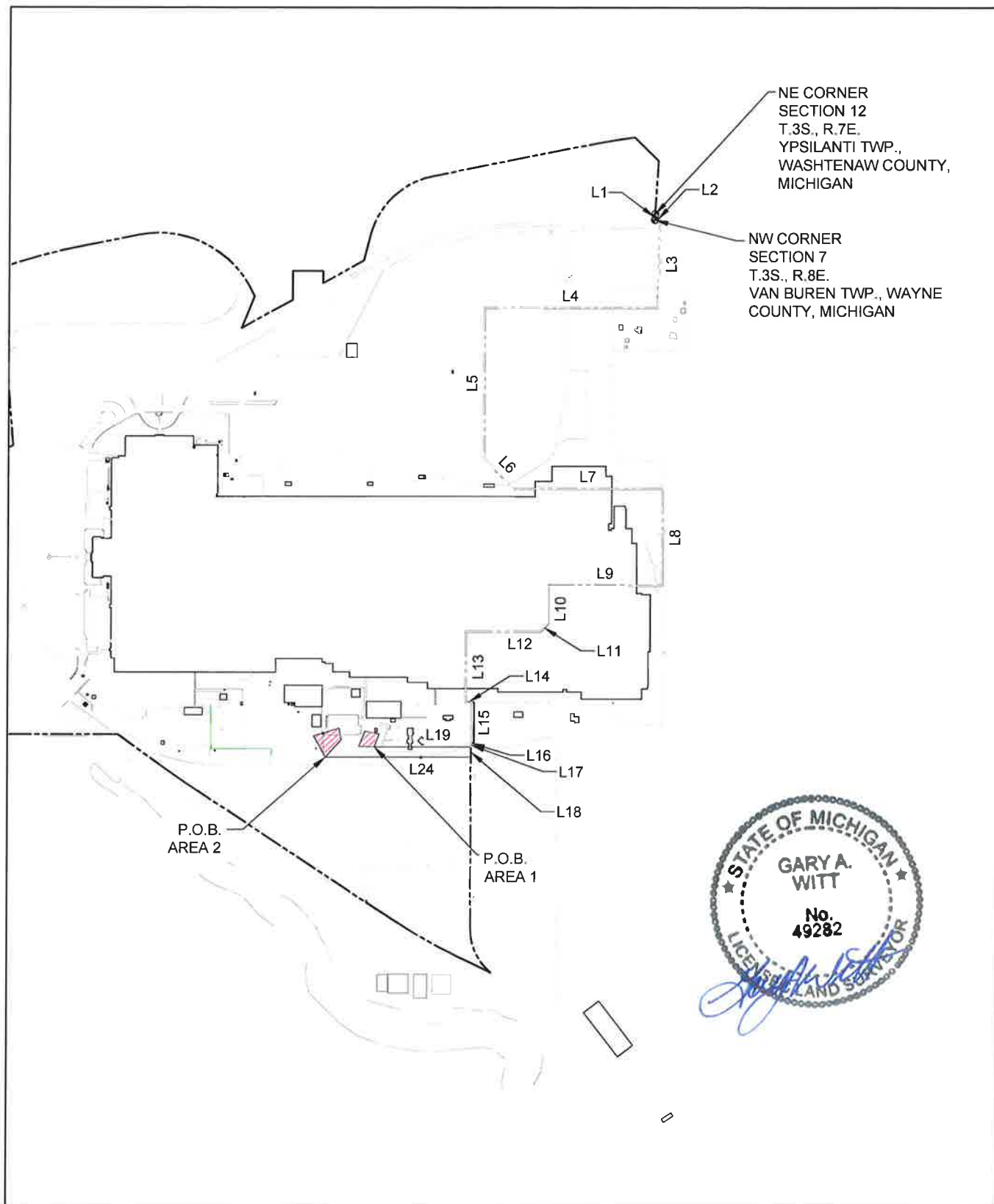


FORMER POWERTRAIN PLANT
YPSILANTI, MICHIGAN

RESTRICTIVE COVENANT
LOCATION OF ARSENIC CONTAMINATED SOILS

081613-09
Oct 28, 2016

RCRA DRC
EXHIBIT 9



0 400 800ft

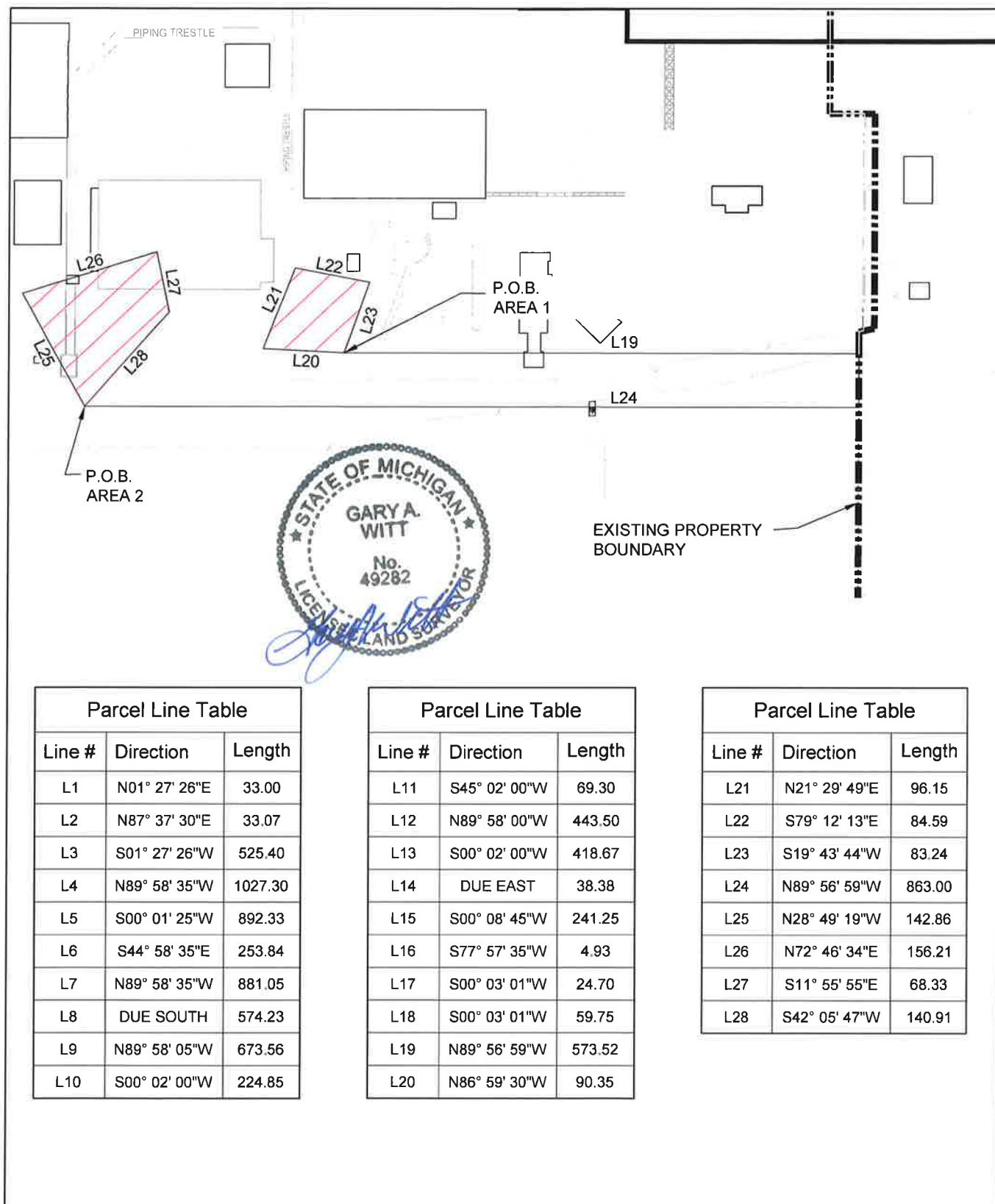


FORMER POWERTRAIN PLANT
YPSILANTI, MICHIGAN

RESTRICTIVE COVENANT
LOCATION OF ARSENIC CONTAMINATED SOILS

081613-09
Nov 1, 2016

RCRA DRC
EXHIBIT 9a



FORMER POWERTRAIN PLANT
YPSILANTI, MICHIGAN

RESTRICTIVE COVENANT
LOCATION OF ARSENIC CONTAMINATED SOILS

081613-09
Nov 1, 2016

RCRA DRC
EXHIBIT 9b

Arsenic Area 1

Part of Section 7, T3S-R8E, Van Buren Township, Wayne County, Michigan and part of Sections 1 and 12, T3S-R7E, Ypsilanti Township, Washtenaw County, Michigan, more particularly described as follows: Commencing at the Northeast Corner of Section 12, T3S-R7E, Ypsilanti Township, Wayne County, Michigan, thence along the East line of Section 12, S 01°27'26" W, 33.00 feet to the Northwest Corner of Section 7, T3S-R8E, Van Buren Township, Wayne County, Michigan; thence along the North line of Section 7, N 87°37'30" E 33.07 feet; thence along a line parallel to the West line of Section 7, S 01°27'26" W, 525.40 feet; thence N 89°58'35" W, 1027.30 feet; thence S 00°01'25" W, 892.33 feet; thence S 44°58'35" E, 253.84 feet; thence S 89°58'35" E, 881.05 feet; thence due South 574.23 feet; thence N 89°58'00" W, 673.56 feet; thence S 00°02'00" W, 224.85 feet; thence S 45°02'00" W, 69.30 feet; thence N 89°58'00" W, 443.50 feet; thence S 00°02'00" W, 418.67 feet; thence Due East 38.38 feet; thence S 00°08'45" W, 241.25 feet; thence S 77°57'35" W, 4.93 feet; thence along the easterly line of an existing concrete roadway, S 00°03'01" W, 24.70 feet; thence N 89°56'59" W, 573.52 feet, to the POINT OF BEGINNING of the parcel to be described; thence N 86°59'30" W, 90.35 feet; thence N 21°29'49" E, 96.15 feet; thence S 79°12'13" E, 84.59 feet; thence S 19°43'44" W, 83.24 feet to the POINT OF BEGINNING, containing 0.17 acres, more or less.

Arsenic Area 2

Part of Section 7, T3S-R8E, Van Buren Township, Wayne County, Michigan and part of Sections 1 and 12, T3S-R7E, Ypsilanti Township, Washtenaw County, Michigan, more particularly described as follows: Commencing at the Northeast Corner of Section 12, T3S-R7E, Ypsilanti Township, Wayne County, Michigan, thence along the East line of Section 12, S 01°27'26" W, 33.00 feet to the Northwest Corner of Section 7, T3S-R8E, Van Buren Township, Wayne County, Michigan; thence along the North line of Section 7, N 87°37'30" E 33.07 feet; thence along a line parallel to the West line of Section 7, S 01°27'26" W, 525.40 feet; thence N 89°58'35" W, 1027.30 feet; thence S 00°01'25" W, 892.33 feet; thence S 44°58'35" E, 253.84 feet; thence S 89°58'35" E, 881.05 feet; thence due South 574.23 feet; thence N 89°58'00" W, 673.56 feet; thence S 00°02'00" W, 224.85 feet; thence S 45°02'00" W, 69.30 feet; thence N 89°58'00" W, 443.50 feet; thence S 00°02'00" W, 418.67 feet; thence Due East 38.38 feet; thence S 00°08'45" W, 241.25 feet; thence S 77°57'35" W, 4.93 feet; thence along the easterly line of an existing concrete roadway, S 00°03'01" W, 84.45 feet; thence N 89°56'59" W, 863.00 feet, to the POINT OF BEGINNING of the parcel to be described; thence N 28°49'19" W, 142.86 feet; thence N 72°46'34" E, 156.21 feet; thence S 11°55'55" E, 68.33 feet; thence S 42°05'47" W, 140.91 feet to the POINT OF BEGINNING, containing 0.34 acres, more or less.



FORMER POWERTRAIN PLANT
YPSILANT, MICHIGAN

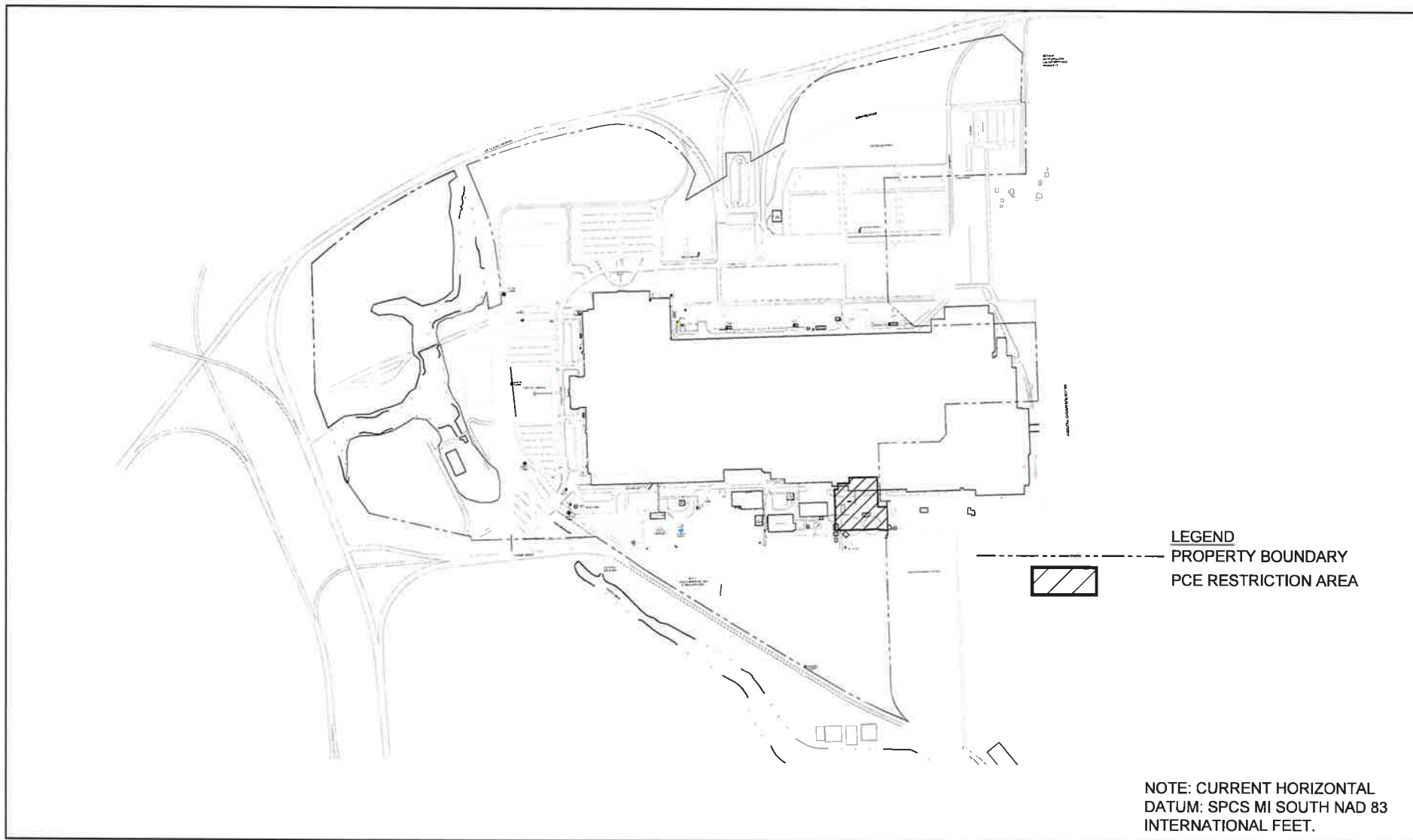
RESTRICTIVE COVENANT
LOCATION OF ARSENIC CONTAMINATED SOILS

081613-09
Oct. 31, 2016

RCRA DRC
Exhibit 9C

EXHIBIT 10

PCE Contaminated Soils



0 500 1000ft

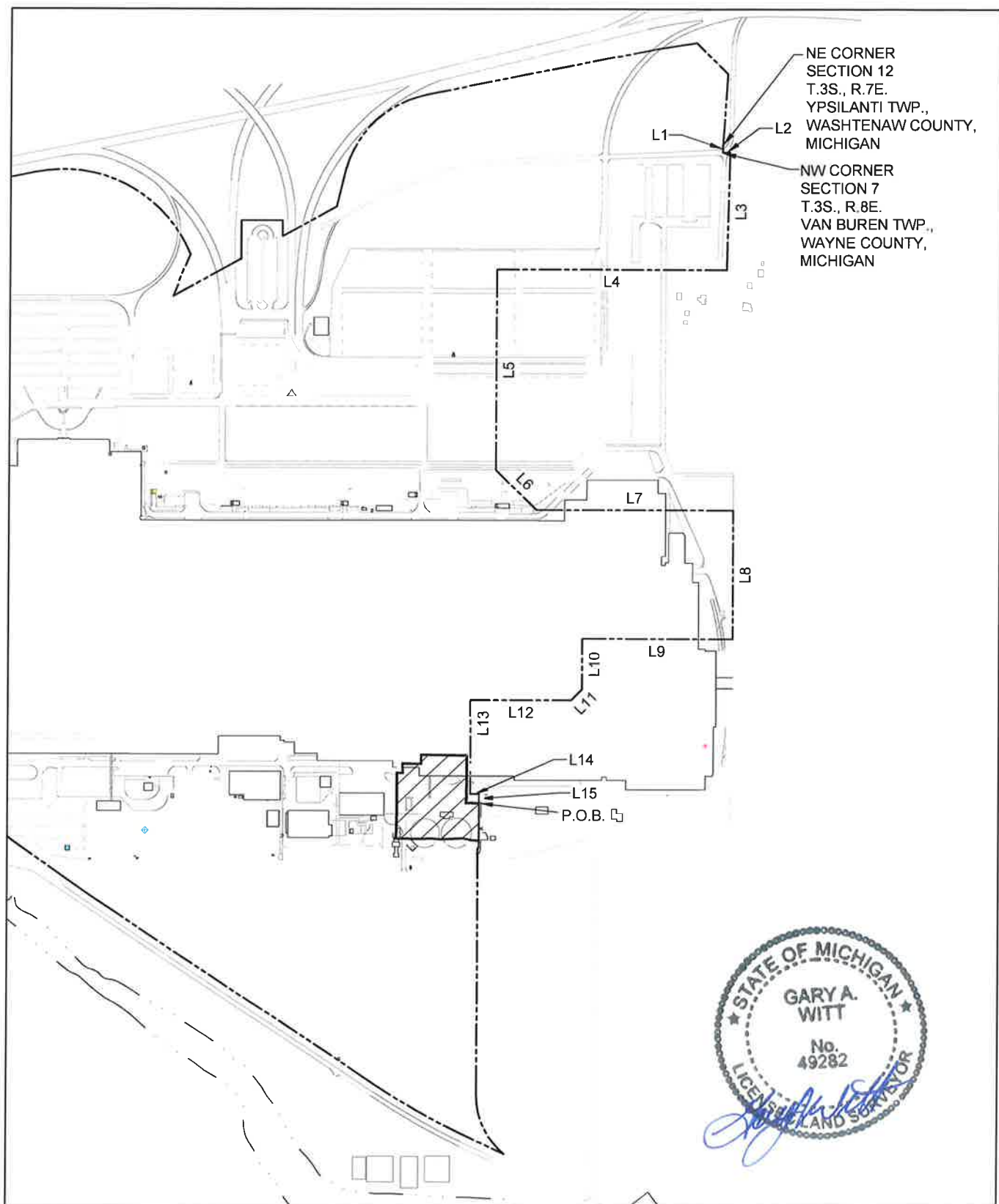


FORMER POWERTRAIN PLANT
 YPSILANTI, MICHIGAN
 RESTRICTIVE COVENANT
 LOCATION OF PCE CONTAMINATED SOILS

081613-09

Oct 28, 2016

RCRA DRC
 EXHIBIT 10



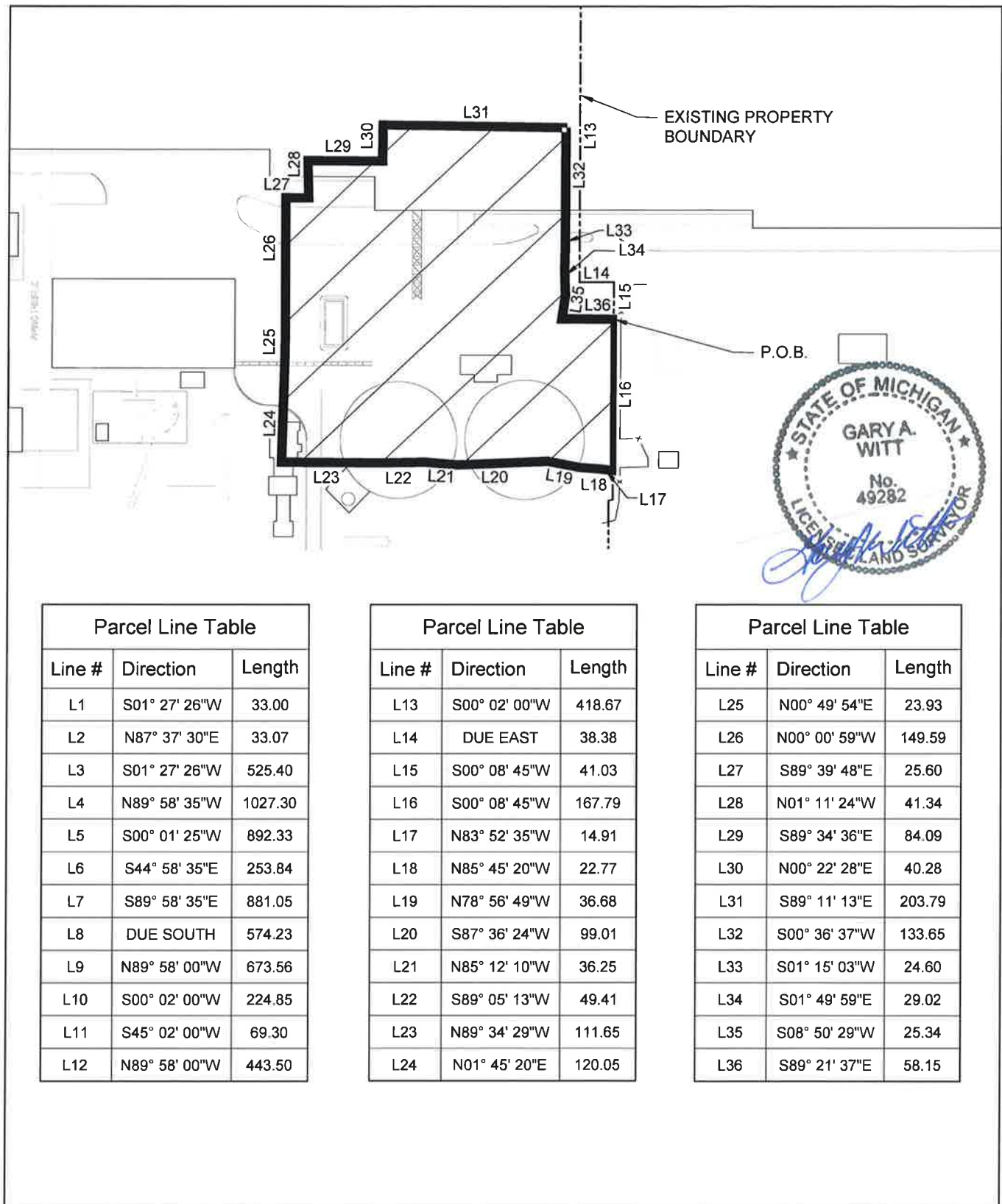
0 300 600ft



FORMER POWERTRAIN PLANT
YPSILANTI, MICHIGAN
RESTRICTIVE COVENANT
LOCATION OF PCE CONTAMINATED SOILS

081613-09
Nov 1, 2016

RCRA DRC
EXHIBIT 10a



Parcel Line Table		
Line #	Direction	Length
L1	S01° 27' 26"W	33.00
L2	N87° 37' 30"E	33.07
L3	S01° 27' 26"W	525.40
L4	N89° 58' 35"W	1027.30
L5	S00° 01' 25"W	892.33
L6	S44° 58' 35"E	253.84
L7	S89° 58' 35"E	881.05
L8	DUE SOUTH	574.23
L9	N89° 58' 00"W	673.56
L10	S00° 02' 00"W	224.85
L11	S45° 02' 00"W	69.30
L12	N89° 58' 00"W	443.50

Parcel Line Table		
Line #	Direction	Length
L13	S00° 02' 00"W	418.67
L14	DUE EAST	38.38
L15	S00° 08' 45"W	41.03
L16	S00° 08' 45"W	167.79
L17	N83° 52' 35"W	14.91
L18	N85° 45' 20"W	22.77
L19	N78° 56' 49"W	36.68
L20	S87° 36' 24"W	99.01
L21	N85° 12' 10"W	36.25
L22	S89° 05' 13"W	49.41
L23	N89° 34' 29"W	111.65
L24	N01° 45' 20"E	120.05

Parcel Line Table		
Line #	Direction	Length
L25	N00° 49' 54"E	23.93
L26	N00° 00' 59"W	149.59
L27	S89° 39' 48"E	25.60
L28	N01° 11' 24"W	41.34
L29	S89° 34' 36"E	84.09
L30	N00° 22' 28"E	40.28
L31	S89° 11' 13"E	203.79
L32	S00° 36' 37"W	133.65
L33	S01° 15' 03"W	24.60
L34	S01° 49' 59"E	29.02
L35	S08° 50' 29"W	25.34
L36	S89° 21' 37"E	58.15



FORMER POWERTRAIN PLANT
YPSILANTI, MICHIGAN

RESTRICTIVE COVENANT

LOCATION OF PCE CONTAMINATED SOILS EXHIBIT 10b

081613-09

Nov 1, 2016

RCRA DRC

PCE

Part of Section 7, T3S-R8E, Van Buren Township, Wayne County, Michigan and part of Sections 1 and 12, T3S-R7E, Ypsilanti Township, Washtenaw County, Michigan, more particularly described as follows: Commencing at the Northeast Corner of Section 12, T3S-R7E, Ypsilanti Township, Wayne County, Michigan, thence along the East line of Section 12, S 01°27'26" W, 33.00 feet to the Northwest Corner of Section 7, T3S-R8E, Van Buren Township, Wayne County, Michigan; thence along the North line of Section 7, N 87°37'30" E 33.07 feet; thence along a line parallel to the West line of Section 7, S 01°27'26" W, 525.40 feet; thence N 89°58'35" W, 1027.30 feet; thence S 00°01'25" W, 892.33 feet; thence S 44°58'35" E, 253.84 feet; thence S 89°58'35" E, 881.05 feet; thence due South 574.23 feet; thence N 89°58'00" W, 673.56 feet; thence S 00°02'00" W, 224.85 feet; thence S 45°02'00" W, 69.30 feet; thence N 89°58'00" W, 443.50 feet; thence S 00°02'00" W, 418.67 feet; thence Due East 38.38 feet; thence S 00°08'45" W, 41.03 feet, to the POINT OF BEGINNING of the parcel to be described; thence continuing S 00°08'45" W, 167.79 feet; thence N 83°52'35" W, 14.91 feet; thence N 85°45'20" W, 22.77 feet; thence N 78°56'49" W, 36.68 feet; thence S 87°36'24" W, 99.01 feet; thence N 85°12'10" W, 36.25 feet; thence S 89°05'13" W, 49.41 feet; thence N 89°34'29" W, 111.65 feet; thence N 01°45'20" E, 120.05 feet; thence N 00°49'54" E, 23.93 feet; thence N 00°00'59" W, 149.59 feet; thence S 89°39'48" E, 25.60 feet; thence N 01°11'24" W, 41.34 feet; thence S 89°34'36" E, 84.09 feet; thence N 00°22'28" E, 40.28 feet; thence S 89°11'13" E, 203.79 feet; thence S 00°36'37" W, 133.65 feet; thence S 01°15'03" W, 24.60 feet; thence S 01°49'59" E, 29.02 feet; thence S 08°50'29" W, 25.34 feet; thence S 89°21'37" E, 58.15 feet to the POINT OF BEGINNING, containing 2.77 acres, more or less.



FORMER POWERTRAIN PLANT
YPSILANT, MICHIGAN

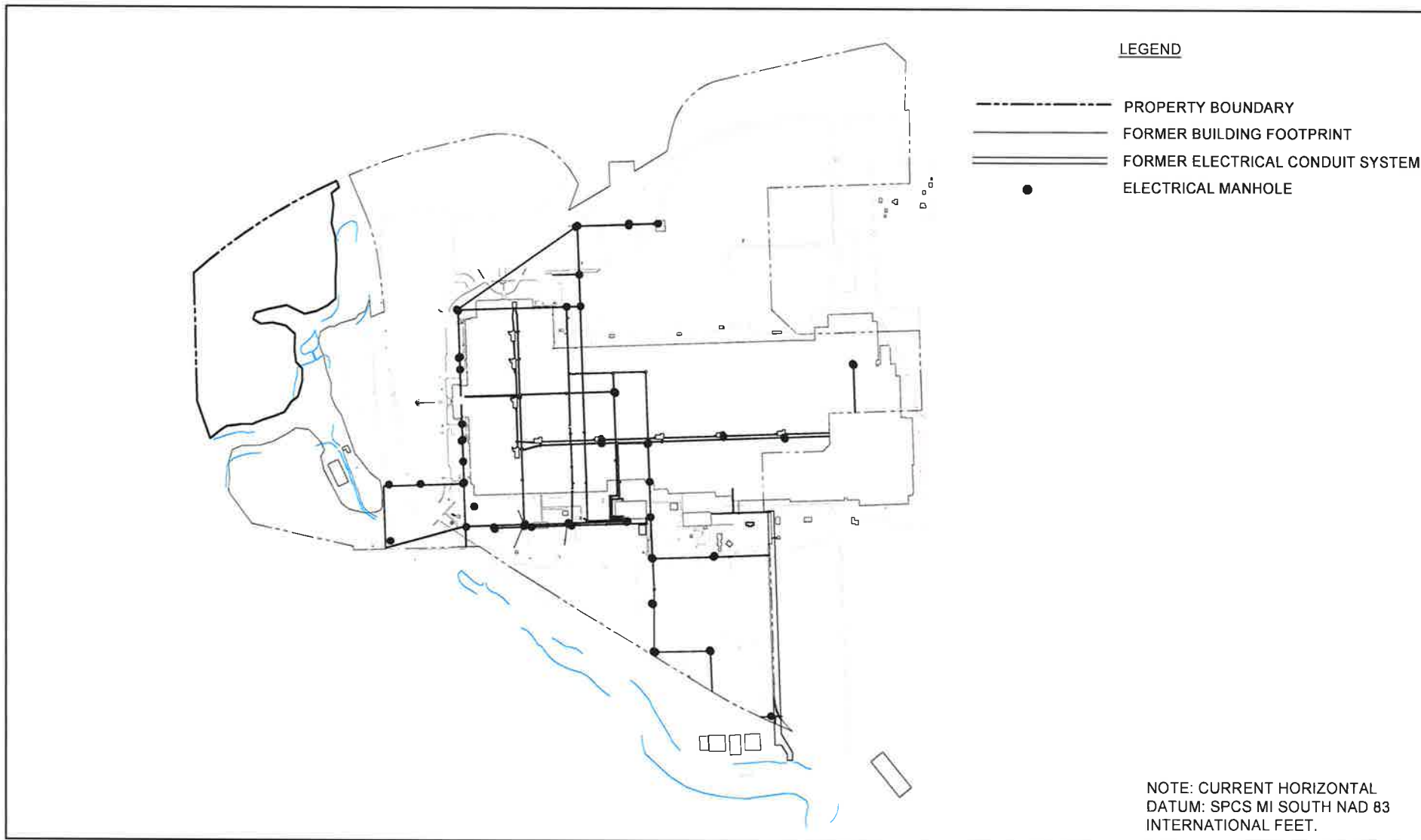
RESTRICTIVE COVENANT
LOCATION OF PCE CONTAMINATED SOILS

081613-09
Oct. 31, 2016

RCRA DRC
Exhibit 10C

EXHIBIT 11

Former Electrical Duct System



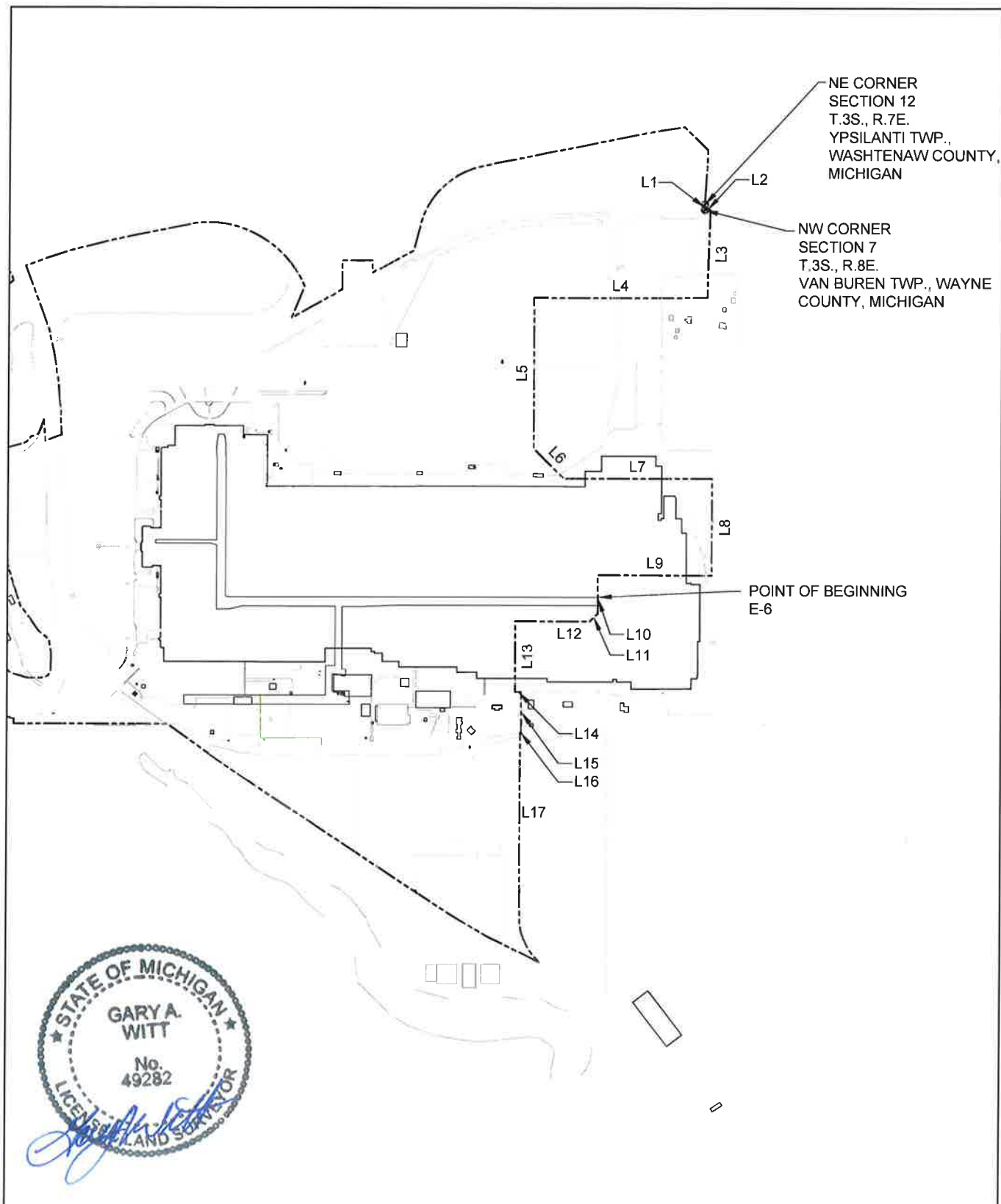
0 500 1000ft



FORMER POWERTRAIN PLANT
YPSILANTI, MICHIGAN
RESTRICTIVE COVENANT
LOCATION OF FORMER ELECTRICAL DUCT SYSTEM

081613-09
Oct 28, 2016

RCRA DRC
EXHIBIT 11



FORMER POWERTRAIN PLANT
YPSILANTI, MICHIGAN

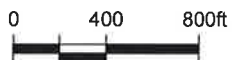
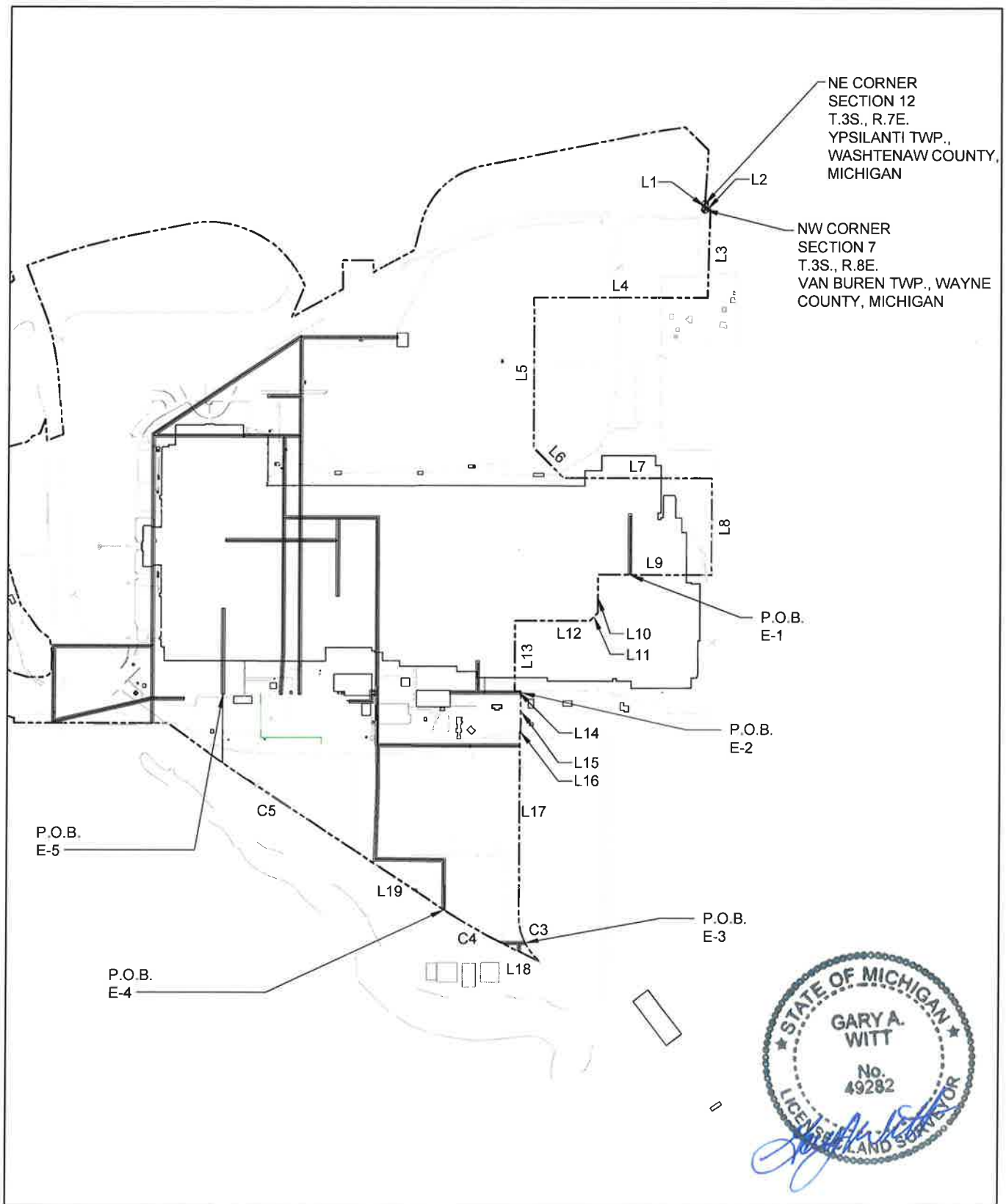
081613-09
Nov 2, 2016

RESTRICTIVE COVENANT

RCRA DRC

LOCATION OF FORMER ELECTRICAL DUCT SYSTEM

EXHIBIT 11



FORMER POWERTRAIN PLANT
YPSILANTI, MICHIGAN

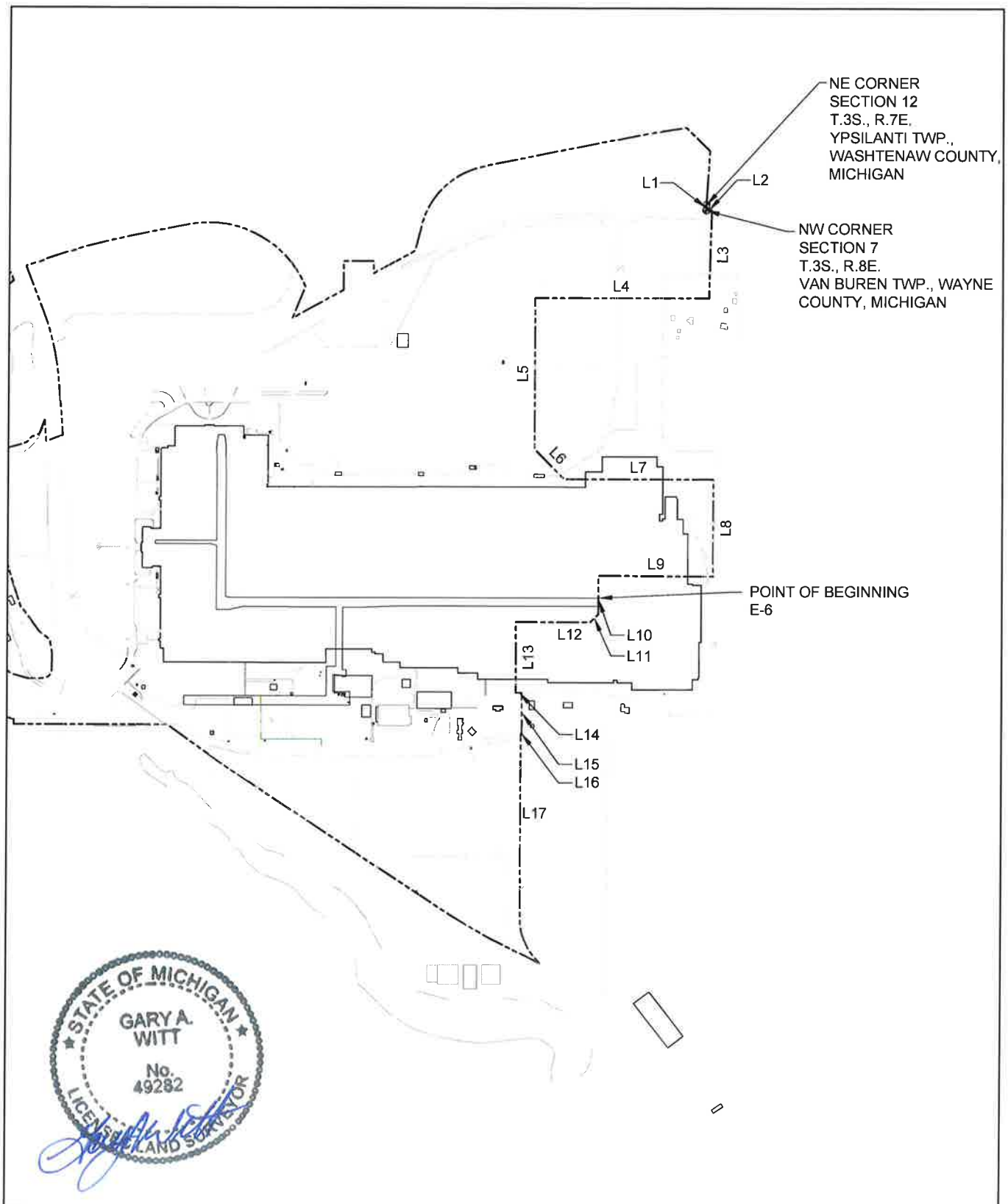
081613-09
Nov 3, 2016

RESTRICTIVE COVENANT

RCRA DRC

LOCATION OF FORMER ELECTRICAL DUCT SYSTEM

EXHIBIT 11a



0 400 800ft



FORMER POWERTRAIN PLANT
YPSILANTI, MICHIGAN

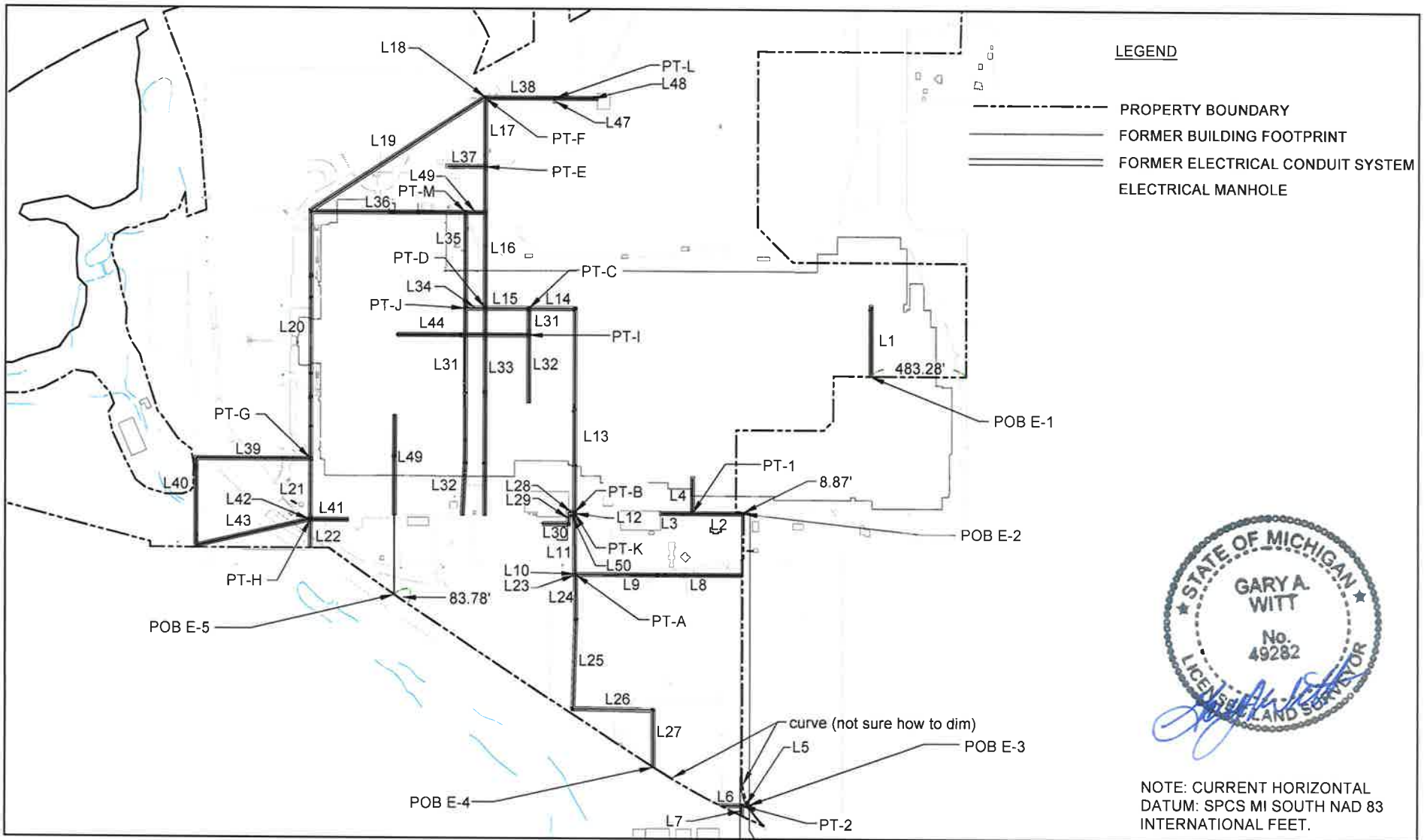
RESTRICTIVE COVENANT

LOCATION OF FORMER ELECTRICAL DUCT SYSTEM

081613-09
Nov 3, 2016

RCRA DRC

EXHIBIT 11b



0 350 700ft

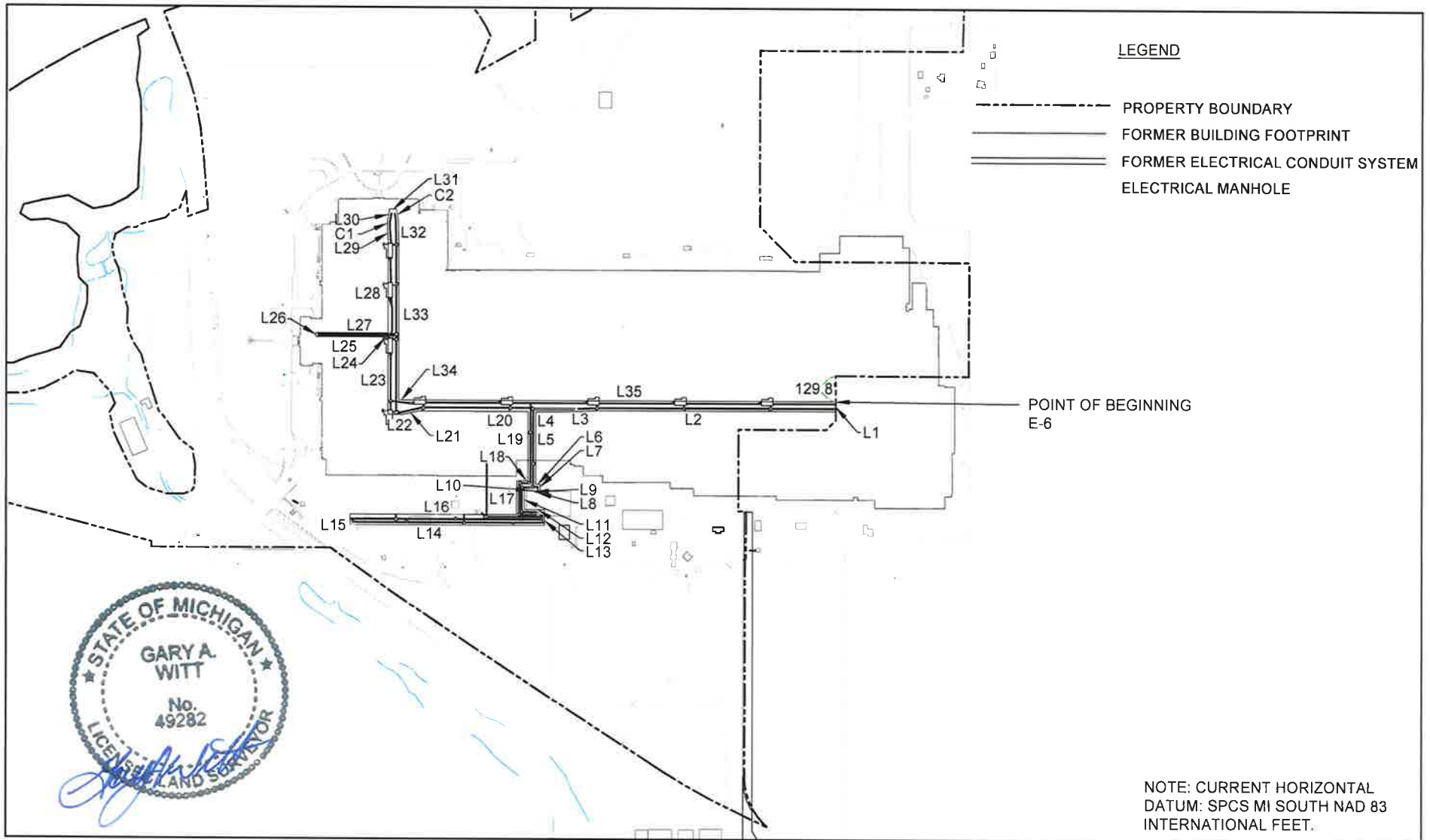


FORMER POWERTRAIN PLANT
YPSILANTI, MICHIGAN
RESTRICTIVE COVENANT
LOCATION OF FORMER ELECTRICAL DUCT SYSTEM

081613-09

Nov 2, 2016

RCRA DRC
EXHIBIT 11c



0 350 700ft



FORMER POWERTRAIN PLANT
YPSILANTI, MICHIGAN
RESTRICTIVE COVENANT
LOCATION OF FORMER ELECTRICAL DUCT SYSTEM

081613-09

Nov 3, 2016

RCRA DRC

EXHIBIT 11d

Parcel Line Table		
Line #	Direction	Length
L1	N1° 27' 26"E	33.00
L2	S87° 37' 30"W	33.07
L3	N1° 27' 26"E	525.40
L4	S89° 58' 35"E	1027.30
L5	N00° 01' 25"E	892.33
L6	N44° 58' 35"W	253.84
L7	N89° 58' 35"W	881.05
L8	DUE SOUTH	574.23
L9	S89° 58' 00"E	673.56
L10	N00° 02' 00"E	224.85
L11	N45° 02' 00"E	69.30
L12	S89° 58' 00"E	443.50
L13	N00° 02' 00"E	418.67
L14	DUE EAST	38.38
L15	N00° 08' 45"E	241.25
L16	S77° 57' 35"W	4.93
L17	S00° 05' 01"W	1102.74
L18	N64° 36' 55"W	204.04
L19	N56° 33' 55"W	1484.43

Parcel Curve Table					
Curve #	Length	Radius	Delta	Chord Bearing	Chord Distance
C3	295.13	334.72	50° 31' 07"	S25° 12' 33"E	285.66
C4	454.26	3233.20	08° 03' 00"	N60° 35' 25"W	453.89
C5	83.78	3379.90	01° 17' 01"	N55° 55' 25"W	83.78

Parcel Line E-6 Table		
Line #	Direction	Length
L1	S00° 02' 00"W	50.00
L2	S89° 59' 59"W	1211.47
L3	S87° 59' 02"W	210.02
L4	S89° 43' 56"W	99.04
L5	S00° 00' 40"E	371.65
L6	N89° 59' 20"E	23.30
L7	S00° 00' 40"E	40.72
L8	DUE WEST	25.76
L9	N00° 00' 40"W	9.00
L10	N86° 17' 06"W	53.67
L11	S00° 54' 10"W	100.29
L12	S89° 12' 33"E	102.47
L13	S00° 00' 40"E	80.53
L14	S89° 59' 20"W	983.92
L15	N00° 00' 40"W	54.79
L16	N89° 59' 20"E	842.50
L17	N00° 43' 37"E	175.43
L18	S89° 32' 48"E	54.56
L19	N00° 00' 40"W	352.55
L20	N89° 43' 56"W	550.80
L21	S76° 57' 25"W	88.35
L22	S89° 59' 20"W	71.13
L23	N00° 00' 40"W	382.40
L24	N75° 03' 55"W	34.31
L25	S89° 59' 20"W	331.41
L26	N00° 00' 40"W	20.00
L27	N89° 59' 20"E	364.56
L28	N00° 00' 40"W	475.93
L29	N04° 08' 12"W	58.65
L30	N10° 08' 19"E	52.31
L31	N89° 59' 20"E	34.24
L32	S01° 07' 00"E	148.43
L33	S00° 00' 40"E	759.53
L34	S83° 22' 08"E	30.71
L35	N89° 59' 55"E	2183.75

Parcel Curve E-6 Table					
Curve #	Length	Radius	Delta	Chord Bearing	Chord Distance
C1	41.09	165.32	14° 14' 31"	N03° 01' 03"E	40.99
C2	53.67	165.32	18° 36' 09"	S10° 25' 05"E	53.44



FORMER POWERTRAIN PLANT
YPSILANTI, MICHIGAN

RESTRICTIVE COVENANT

LOCATION OF FORMER ELECTRICAL DUCT SYSTEM

081613-09
Nov 3, 2016

RCRA DRC

EXHIBIT 11e

Parcel Line E-1 Table		
Line #	Direction	Length
L1	N00° 00' 40"W	351.54

Parcel Line E-2 Table		
Line #	Direction	Length
L2	S89° 58' 59"W	259.73
L3	S89° 58' 59"W	155.43
L4	DUE NORTH	178.48

Parcel Line E-3 Table		
Line #	Direction	Length
L5	S89° 37' 11"W	33.56
L6	S89° 37' 11"W	106.71
L7	S01° 47' 26"W	51.08

Parcel Line E-5 Table		
Line #	Direction	Length
L49	N00° 00' 40"W	510.28

Parcel Line E-4 Table		
Line #	Direction	Length
L8	S89° 59' 10"W	438.02
L9	S89° 42' 04"W	410.0
L10	N13° 48' 21"W	5.07
L11	N00° 27' 33"W	312.21
L12	N00° 27' 33"W	34.29
L13	N00° 00' 40"W	999.57
L14	S89° 59' 20"W	235.25
L15	S89° 59' 20"W	221.80
L16	N00° 00' 40"W	720.21
L17	N00° 00' 40"W	351.23
L18	N00° 00' 40"W	4.92
L19	S56° 32' 20"W	1057.81
L20	S00° 00' 40"E	1258.66
L21	S00° 00' 40"E	310.88
L22	S00° 00' 40"E	145.39
L23	S13° 48' 21"E	3.85
L24	S00° 30' 52"E	212.76
L25	S01° 44' 54"W	461.44
L26	S89° 13' 55"E	407.43
L27	S00° 21' 25"E	293.81
L28	S89° 59' 20"W	32.94
L29	S00° 00' 40"E	58.83
L30	S89° 59' 20"W	130.86
L31	S00° 00' 40"E	135.90
L32	S00° 00' 40"E	330.66
L33	S00° 00' 40"E	1050.79
L34	DUE WEST	100.11
L35	N00° 00' 40"W	485.69
L36	S89° 59' 20"W	782.50
L37	S89° 59' 20"W	191.69
L38	N89° 59' 23"E	351.08
L47	N89° 59' 23"E	209.89
L39	S89° 59' 20"W	580.58
L40	S00° 00' 40"E	455.47
L41	N89° 59' 20"E	192.20
L42	S89° 59' 20"W	7.90
L43	S76° 42' 59"W	588.40
L44	S89° 59' 21"W	666.93
L45	S00° 00' 40"E	792.07
L46	S02° 45' 40"W	2559.04
L48	S00° 00' 40"E	13.93
L49	S89° 59' 19"W	100.10
L50	S87° 18' 37"W	33.11



FORMER POWERTRAIN PLANT
YPSILANTI, MICHIGAN

RESTRICTIVE COVENANT

LOCATION OF FORMER ELECTRICAL DUCT SYSTEM

081613-09
Nov 3, 2016

RCRA DRC

EXHIBIT 11F

Electrical Duct System

Electrical Duct 1

20 foot wide easement laying 10 feet on each side of the following described centerline.

Part of Section 7, T3S-R8E, Van Buren Township, Wayne County, Michigan and part of Sections 1 and 12, T3S-R7E, Ypsilanti Township, Washtenaw County, Michigan, more particularly described as follows: Commencing at the Northeast Corner of Section 12, T3S-R7E, Ypsilanti Township, Wayne County, Michigan, thence along the East line of Section 12, S 01°27'26" W, 33.00 feet to the Northwest Corner of Section 7, T3S-R8E, Van Buren Township, Wayne County, Michigan; thence along the North line of Section 7, N 87°37'30" E 33.07 feet; thence along a line parallel to the West line of Section 7, S 01°27'26" W, 525.40 feet; thence N 89°58'35" W, 1027.30 feet; thence S 00°01'25" W, 892.33 feet; thence S 44°58'35" E, 253.84 feet; thence S 89°58'35" E, 881.05 feet; thence due South 574.23 feet; thence N 89°58'00" W, 483.28 feet, to the POINT OF BEGINNING of the parcel to be described; thence N 00°00'40" W, 351.54 feet to the POINT OF TERMINUS.

Electrical Duct 2

20 foot wide easement laying 10 feet on each side of the following described centerline.

Part of Section 7, T3S-R8E, Van Buren Township, Wayne County, Michigan and part of Sections 1 and 12, T3S-R7E, Ypsilanti Township, Washtenaw County, Michigan, more particularly described as follows: Commencing at the Northeast Corner of Section 12, T3S-R7E, Ypsilanti Township, Wayne County, Michigan, thence along the East line of Section 12, S 01°27'26" W, 33.00 feet to the Northwest Corner of Section 7, T3S-R8E, Van Buren Township, Wayne County, Michigan; thence along the North line of Section 7, N 87°37'30" E 33.07 feet; thence along a line parallel to the West line of Section 7, S 01°27'26" W, 525.40 feet; thence N 89°58'35" W, 1027.30 feet; thence S 00°01'25" W, 892.33 feet; thence S 44°58'35" E, 253.84 feet; thence S 89°58'35" E, 881.05 feet; thence Due South 574.23 feet; thence N 89°58'00" W, 673.56 feet; thence S 00°02'00" W, 224.85 feet; thence S 45°02'00" W, 69.30 feet; thence N 89°58'00" W, 443.50 feet; thence S 00°02'00" W, 418.67 feet; thence Due East 38.38 feet; thence S 00°08'45" W, 8.87 feet to the POINT OF BEGINNING, of the line to be described; thence S 89°58'59" W, 259.73 feet to Point K; thence continuing S 89°58'59" W, 155.43 feet to the POINT OF TERMINUS.

Thence continuing from POINT K, Due North, 178.48 feet to the POINT OF TERMINUS.

Electrical Duct 3

20 foot wide easement laying 10 feet on each side of the following described centerline.

Part of Section 7, T3S-R8E, Van Buren Township, Wayne County, Michigan and part of Sections 1 and 12, T3S-R7E, Ypsilanti Township, Washtenaw County, Michigan, more particularly described as follows: Commencing at the Northeast Corner of Section 12, T3S-R7E, Ypsilanti Township, Wayne County, Michigan, thence along the East line of Section 12, S 01°27'26" W, 33.00 feet to the Northwest Corner of Section 7, T3S-R8E, Van Buren Township, Wayne County, Michigan; thence along the North line of Section 7, N 87°37'30" E 33.07 feet; thence along a line parallel to the West line of Section 7, S 01°27'26" W, 525.40 feet; thence N 89°58'35" W, 1027.30 feet; thence S 00°01'25" W, 892.33 feet; thence S 44°58'35" E, 253.84 feet; thence S 89°58'35" E, 881.05 feet; thence Due South 574.23 feet; thence



FORMER POWERTRAIN PLANT
YPSILANT, MICHIGAN

RESTRICTIVE COVENANT
LOCATION OF ELECTRICAL DUCT SYSTEM

081613-09
Oct. 31, 2016

RCRA DRC
Exhibit 11g

N 89°58'00" W, 673.56 feet; thence S 00°02'00" W, 224.85 feet; thence S 45°02'00" W, 69.30 feet; thence N 89°58'00" W, 443.50 feet; thence S 00°02'00" W, 418.67 feet; thence Due East 38.38 feet; thence S 00°08'45" W, 241.25 feet; thence S 77°57'35" W, 4.93 feet; thence along the easterly line of an existing concrete roadway, S 00°03'01" W, 1102.74 feet; thence along the easterly edge of roadway, Southerly along an arc left, having a length of 154.83 feet, a radius of 334.72 feet, a central angle of 26°30'08", and a chord which bears S 13°12'03" E, 153.45 feet, to the POINT OF BEGINNING, of the line to be described; thence S 89°37'11" W, 33.56 feet to POINT L; thence continuing S 89°37'11" W, 106.71 feet to the POINT OF TERMINUS. Thence continuing from POINT L, S 01°47'26" W, 51.08 feet to the POINT OF TERMINUS

Electrical Duct 4

20 foot wide easement laying 10 feet on each side of the following described centerline.

Part of Section 7, T3S-R8E, Van Buren Township, Wayne County, Michigan and part of Sections 1 and 12, T3S-R7E, Ypsilanti Township, Washtenaw County, Michigan, more particularly described as follows: Commencing at the Northeast Corner of Section 12, T3S-R7E, Ypsilanti Township, Wayne County, Michigan, thence along the East line of Section 12, S 01°27'26" W, 33.00 feet to the Northwest Corner of Section 7, T3S-R8E, Van Buren Township, Wayne County, Michigan; thence along the North line of Section 7, N 87°37'30" E 33.07 feet; thence along a line parallel to the West line of Section 7, S 01°27'26" W, 525.40 feet; thence N 89°58'35" W, 1027.30 feet; thence S 00°01'25" W, 892.33 feet; thence S 44°58'35" E, 253.84 feet; thence S 89°58'35" E, 881.05 feet; thence Due South 574.23 feet; thence N 89°58'00" W, 673.56 feet; thence S 00°02'00" W, 224.85 feet; thence S 45°02'00" W, 69.30 feet; thence N 89°58'00" W, 443.50 feet; thence S 00°02'00" W, 418.67 feet; thence Due East 38.38 feet; thence S 00°08'45" W, 241.25 feet; thence S 77°57'35" W, 4.93 feet; thence along the easterly line of an existing concrete roadway, S 00°03'01" W, 81.74 feet; to the POINT OF BEGINNING, of the line to be described; thence S 89°59'10" W, 438.02 feet; thence N 89°42'04" W, 410.00 feet to Point A; thence N 13°48'21" W, 5.07 feet; thence N 00°27'33" W, 295.58 feet to Point K; thence N 00°27'33" W, 16.63 feet to Point B; thence continuing N 00°27'33" W, 34.29 feet; thence N 00°00'40" W, 999.57 feet; thence S 89°59'20" W, 235.25 feet to Point C; thence continuing S 89°59'20" W, 221.80 feet to Point D; thence N 00°00'40" W, 720.21 feet to Point E; thence continuing N 00°00'40" W, 351.23 feet to Point F; thence continuing N 00°00'40" W, 4.92 feet; thence S 56°32'20" W, 1057.81 feet; thence S 00°00'40" E, 1258.66 feet to Point G; thence continuing S 00°00'40" E, 310.88 feet to Point H; thence continuing S 00°00'40" E, 145.39 feet to the POINT OF TERMINUS. Thence continuing from Point A, S 13°48'21" E, 3.85 feet; thence S 00°30'52" E, 212.76 feet; thence S 01°44'54" W, 461.44 feet; thence S 89°13'55" E, 407.43 feet; thence S 00°21'25" E, 293.81 feet to the POINT OF TERMINUS. Thence continuing from Point B, S 89°59'20" W, 32.94 feet; thence S 00°00'40" E, 58.83 feet; thence S 89°59'20" W, 130.86 feet to the POINT OF TERMINUS. Thence continuing from Point C, S 00°00'42" E, 135.90 feet to Point I; thence continuing S 00°00'42" E, 330.66 feet to the POINT OF TERMINUS. Thence continuing from Point D, S 00°00'40" E, 1050.79 feet to the POINT OF TERMINUS. Thence continuing from Point D, Due West, 100.11 feet to Point J; thence N 00°00'40" W, 485.69 feet to POINT M; thence S 89°59'20" W, 782.50 feet to the POINT OF TERMINUS. Thence continuing from Point E, S 89°59'20" W, 191.69 feet to the POINT OF TERMINUS. Thence continuing from Point F, N 89°59'23" E, 351.08 feet to POINT L; thence N 89°59'23" E, 209.89 feet to the POINT OF TERMINUS.



FORMER POWERTRAIN PLANT
YPSILANT, MICHIGAN

RESTRICTIVE COVENANT
LOCATION OF ELECTRICAL DUCT SYSTEM

081613-09
Oct. 31, 2016

RCRA DRC
Exhibit 11g

Thence continuing from Point G, S 89°59'20" W, 580.58 feet; thence S 00°00'40" E, 455.47 feet to the POINT OF TERMINUS.

Thence continuing from Point H, N 89°59'20" E, 192.20 feet to the POINT OF TERMINUS.

Thence continuing from Point H, S 89°59'20" W, 7.90 feet; thence S 76°42'59" W, 588.40 feet to the POINT OF TERMINUS.

Thence continuing from Point I, S 89°59'21" W, 666.93 feet to the POINT OF TERMINUS.

Thence continuing from Point J, S 00°00'40" E, 792.07 feet; thence S 02°45'40" W, 259.04 feet to the POINT OF TERMINUS.

Thence continuing from Point K, N 87°18'37" W, 33.11 feet to the POINT OF TERMINUS.

Thence continuing from Point L, S 00°00'40" E, 13.93 feet to the POINT OF TERMINUS.

Thence continuing from Point M, N 89°59'19" E, 100.10 feet to the POINT OF TERMINUS.

Electrical Duct 5

20 foot wide easement laying 10 feet on each side of the following described centerline.

Part of Section 7, T3S-R8E, Van Buren Township, Wayne County, Michigan and part of Sections 1 and 12, T3S-R7E, Ypsilanti Township, Washtenaw County, Michigan, more particularly described as follows: Commencing at the Northeast Corner of Section 12, T3S-R7E, Ypsilanti Township, Wayne County, Michigan, thence along the East line of Section 12, S 01°27'26" W, 33.00 feet to the Northwest Corner of Section 7, T3S-R8E, Van Buren Township, Wayne County, Michigan; thence along the North line of Section 7, N 87°37'30" E 33.07 feet; thence along a line parallel to the West line of Section 7, S 01°27'26" W, 525.40 feet; thence N 89°58'35" W, 1027.30 feet; thence S 00°01'25" W, 892.33 feet; thence S 44°58'35" E, 253.84 feet; thence S 89°58'35" E, 881.05 feet; thence due South 574.23 feet; thence N 89°58'00" W, 673.56 feet; thence S 00°02'00" W, 224.85 feet; thence S 45°02'00" W, 69.30 feet; thence N 89°58'00" W, 443.50 feet; thence S 00°02'00" W, 418.67 feet; thence Due East 38.38 feet; thence S 00°08'45" W, 241.25 feet; thence S 77°57'35" W, 4.93 feet; thence along the easterly line of an existing concrete roadway, S 00°03'01" W, 1102.74 feet; thence along the easterly edge of roadway, thence Southeasterly along an arc left, having a length of 295.13 feet, a radius of 334.72 feet, a central angle of 50°31'08", and a chord which bears S 25°12'32" E, 285.66 feet; thence along a line not tangent to the foregoing curve, N 64°36'55" W, 204.04 feet to a point of curve; thence Northwesterly along an arc right, having a length of 454.26 feet, a radius of 3233.20 feet, a central angle of 08°03'00", and a chord which bears N 60°35'25" W, 453.89 feet; thence N 56°33'55" W, 1484.43 feet; thence Northwesterly along an arc right, having a length of 83.78 feet, a radius of 3739.90 feet, a central angle of 01°17'01", and a chord which bears N 55°55'25" W, 83.78 feet; thence Due North, 406.19 feet, to the POINT OF BEGINNING of the line to be described; thence N 00°00'40" W, 510.28 feet to the POINT OF TERMINUS.

Electrical Duct 6

Part of Section 7, T3S-R8E, Van Buren Township, Wayne County, Michigan and part of Sections 1 and 12, T3S-R7E, Ypsilanti Township, Washtenaw County, Michigan, more particularly described as follows: Commencing at the Northeast Corner of Section 12, T3S-R7E, Ypsilanti Township, Wayne County, Michigan, thence along the East line of Section 12, S 01°27'26" W, 33.00 feet to the Northwest Corner of Section 7, T3S-R8E, Van Buren Township, Wayne County, Michigan; thence along the North line of Section 7, N 87°37'30" E



FORMER POWERTRAIN PLANT
YPSILANT, MICHIGAN

RESTRICTIVE COVENANT
LOCATION OF ELECTRICAL DUCT SYSTEM

081613-09
Oct. 31, 2016

RCRA DRC
Exhibit 11g

33.07 feet; thence along a line parallel to the West line of Section 7, S 01°27'26" W, 525.40 feet; thence N 89°58'35" W, 1027.30 feet; thence S 00°01'25" W, 892.33 feet; thence S 44°58'35" E, 253.84 feet; thence S 89°58'35" E, 881.05 feet; thence Due South 574.23 feet; thence N 89°58'00" W, 673.56 feet; thence S 00°02'00" W, 129.80 feet, to the POINT OF BEGINNING, of the parcel to be described; thence continuing S 00°02'00" W, 50.00 feet; thence S 89°59'59" W, 1211.47 feet; thence S 87°59'02" W, 210.02 feet; thence N 89°43'56" W, 99.04 feet; thence S 00°00'40" E, 371.65 feet; thence N 89°59'20" E, 23.30 feet; thence S 00°00'40" E, 40.72 feet; thence Due West, 25.76 feet; thence N 00°00'40" W, 9.00 feet; thence N 86°17'06" W, 53.67 feet; thence S 00°54'10" W, 100.29 feet; thence S 89°12'33" E, 102.47 feet; thence S 00°00'40" E, 80.53 feet; thence S 89°59'20" W, 983.92 feet; thence N 00°00'40" W, 54.79 feet; thence N 89°59'20" E, 842.50 feet; thence N 00°43'37" E, 175.43 feet; thence S 89°32'49" E, 54.56 feet; thence N 00°00'40" W, 352.55 feet; thence N 89°43'56" W, 550.80 feet; thence S 76°57'25" W, 88.35 feet; thence S 89°59'20" W, 71.13 feet; thence N 00°00'40" W, 382.40 feet; thence N 75°03'55" W, 34.31 feet; thence S 89°59'20" W, 331.41 feet; thence N 00°00'40" W, 20.00 feet; thence N 89°59'20" E, 364.56 feet; thence N 00°00'40" W, 475.93 feet; thence N 04°06'12" W, 58.65 feet; thence Northerly along an arc right, having a length of 41.09 feet, a radius of 165.32 feet, a central angle of 14°14'31", and a chord which bears N 03°01'03" E, 40.99 feet; thence N 10°08'19" E, 52.31 feet; thence N 89°59'20" E, 34.24 feet; thence Southerly along an arc right, having a length of 53.67 feet, a radius of 165.32 feet, a central angle of 18°36'09", and a chord which bears S 10°25'05" E, 53.44 feet; thence S 01°07'00" E, 148.43 feet; thence S 00°00'40" E, 759.53 feet; thence S 83°22'08" E, 30.71 feet; thence N 89°59'55" E, 2183.75 feet to the POINT OF BEGINNING, containing 6.00 acres, more or less.



FORMER POWERTRAIN PLANT
YPSILANT, MICHIGAN

RESTRICTIVE COVENANT
LOCATION OF ELECTRICAL DUCT SYSTEM

081613-09
Oct. 31, 2016

RCRA DRC
Exhibit 11g

Appendix B

TSCA Restrictive Covenant

**DECLARATION OF RESTRICTIVE COVENANT
TSCA ISSUES**

By RACER Properties LLC

MDEQ Reference Numbers: RC-OWMRP-111-16-__

Facility MID Number: MID ____

MDEQ Approval Date: ____, 2016

2930 Ecorse Road

November 4, 2016

First American Title

725930

67

**DECLARATION OF RESTRICTIVE COVENANT
TSCA ISSUES**

MDEQ Reference Numbers: RC-OWMRP-111-16-____

Facility MID Number: MID _____

MDEQ Approval Date: _____, 2016

This Declaration of Restrictive Covenant (Restrictive Covenant) is made to protect public health, safety, or welfare, or the environment pursuant to the provisions of Part 111, Hazardous Waste Management, Michigan Compiled Laws (MCL) 324.11101, *et seq.* (Part 111); 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.*; 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.*; and the Toxic Substances Control Act, 15 U.S.C. §§ 2601 *et seq.* (TSCA), and the administrative rules promulgated pursuant to these statutes.

This Restrictive Covenant is made on November 4, 2016 by RACER Properties LLC, the Grantor, an entity wholly owned by the Revitalizing Auto Communities Environmental Response Trust ("Trust") and the current fee title holder of the Property, such Property legally described in Exhibit 1 and depicted in Exhibit 2, the location of which is located at 2930 Ecorse Road in the Townships of Ypsilanti and Van Buren, Washtenaw and Wayne Counties, respectively, State of Michigan ("Property" or "Site"), for the benefit of the Grantee, State of Michigan, Department of Environment Quality (MDEQ), the address of which is 525 West Allegan Street, P.O. Box 30473, Lansing, MI 48909-7973 and the United States Environmental Protection Agency (USEPA), the address of which is 77 West Jackson, Chicago, IL 60604.

This Restrictive Covenant has been prepared and recorded to prevent damage to or disturbance of any component of the constructed remedy/corrective measures, to prohibit or restrict activities that could result in unacceptable exposure to environmental contamination, and to provide notification of polychlorinated biphenyls ("PCB") Remediation Waste or PCB Bulk Product Waste present at the Property. Recording of this Restrictive Covenant is designed to prevent damage or disturbance to portions of the former electrical duct work, cable pull vaults, below grade electrical substations, as well as, the former powerhouse basement, KK basement (confirm label) and ancillary facilities that have been covered, enclosed or sealed in place to contain potential migration or contact with PCB wastes; to restrict future use of the areas where PCB Remediation Wastes or Bulk Product Wastes have been disposed of on the Property to "Low Occupancy Area" use as defined pursuant to TSCA in Part 761.3 of Title 40 of the Code of Federal Regulations (40 CFR Part 761.3); and to require any future work in areas where PCB Remediation Wastes or PCB Bulk Product Wastes have been disposed of on the Property by or for the Owner, be conducted in conformance with TSCA, and all other relevant state and federal laws.

The land and resource use restrictions contained in this Restrictive Covenant are based upon information available to MDEQ and the USEPA at the time this document was recorded. Future changes in the environmental condition of the Property or changes in the PCB cleanup criteria developed; the discovery of additional PCB Remediation Wastes or PCB Bulk Product Wastes 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, or welfare, or 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 MDEQ, Remediation and Redevelopment Division.

Based on the results of Site investigations, the Property contains hazardous substances in soil and groundwater 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 and above TSCA levels per 40 CFR Part 761.3.

MDEQ recommends 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 Response Activity/Corrective Measures

The Site was originally developed in the 1940's as a bomber production plant. Over its long history (through 2010), the plant was used for various manufacturing operations. Environmental investigations at the Site have included the review of historical information and investigation of potential areas of impacts based on historical operations and overall plant coverage. A significant portion of the area beneath the former plant building footprint is impacted with Light Non-aqueous Phase Liquid (LNAPL) (~40 acres of the 80 acre slab). The LNAPL body is stable/non-migrating and mostly consists of unrecoverable residual oils including cutting oils, transmission fluids and lubricating oils. There are some localized areas of elevated levels of metals and chlorinated volatile organic compounds in soils and/or groundwater south of the former plant building that were identified during investigations. Contaminants are present above drinking water and GSI criteria in groundwater in various areas of the site. As a corrective measure, groundwater collection and treatment system designed to mitigate potential offsite migration of impacted groundwater has been proposed.

The majority of the primary manufacturing plant was demolished beginning in the fall of 2013 with completion in the spring of 2015. As the demolition work was being completed a previously unknown below grade former electrical power distribution system was discovered throughout the Site. Subsequent investigations and field surveys have determined at least portions of this system contain historical power cables containing PCBs, a portion of which are not TSCA regulated, and former substations impacted with PCBs. Most of this system will be encapsulated in place with restrictions to ensure encasement of and to prevent disturbance of the PCB materials. (See Exhibit 3)

Definitions

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

"Grantor" shall mean RACER Properties LLC, an entity wholly-owned by the Trust and the current 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) 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 NREPA, in effect at the time of the recording of this restrictive covenant.

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

"TSCA" shall mean the Toxic Substances Control Act, as amended, 15 U.S.C. §2601 *et seq.*

"TSCA Restricted Area" shall mean that portion of the site as described in the TSCA deed restricted area in Exhibit 3.

"Settlement Agreement" shall mean the Environmental Response Trust Consent Decree and 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).

"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, or TSCA and 40 CFR Part 761, 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 TSCA Restricted Area has been used for disposal of PCB Remediation Waste and PCB Bulk Product Waste and the Owner shall prohibit all uses of the Property not in accordance with Low Occupancy Area as defined in 40 CFR 761.3. The Owner is required to apply to USEPA at 77 West Jackson, Chicago, IL 60604, under 40 CFR 761.61(a), for approval to change this Low Occupancy Area use restriction.
2. **Notification of PCB Remediation Waste.** This provision provides the notification required by 40 CFR Part 761.61(a)(8)(i)(A) that PCB Remediation Waste and PCB Bulk Product Waste is present in the TSCA Restricted Area. The definition and limits of the TSCA Restricted Area and the features included within the TSCA Restricted Area shall be as defined and approved by US EPA or modified as approved by US EPA. The PCB Remediation Waste is present at:
 - a. The former powerhouse basement beneath a flowable fill/concrete cover, compacted aggregate, and a 4 inch concrete cap placed level to existing grade as depicted on Exhibits 4, 4a and 4b at concentrations less than 100 parts per million (ppm). The cap/cover over this area must be maintained in perpetuity per 40 CFR Part 761.61(a)(8) and the provisions of this Restrictive Covenant.
 - b. The former substation area known as KK7 beneath compacted aggregate and a 6 inch concrete cap placed level to the existing grade as depicted on Exhibits 5, 5a and 5b at concentrations less than 100 parts per million (ppm). The cap/cover over this area must be maintained in perpetuity per 40 CFR Part 761.61(a)(8) and the provisions of this Restrictive Covenant.
 - c. The former substation area known as Substation D located a minimum of 8 inches beneath the surface of the original concrete floor as depicted on Exhibits 6, 6a and 6b at concentrations less than 100 ppm. The cap/cover over this designated area, as depicted in Exhibit 6b, must be maintained in perpetuity per 40 CFR Part 761.61(a)(8) and the provisions of this Restrictive Covenant.
 - d. The electrical duct and cable vault system encapsulated within concrete encased duct work and concrete filled vaults as typically depicted on Exhibit 10. The concrete encapsulation around the electrical duct system and the vault encasement (not including the surface of the slab), as illustrated in Exhibit 10a, must be maintained in perpetuity per 40 CFR Part 761.61(a)(8) and the provisions

of this Restrictive Covenant subject to EPA final approval and designation of appropriate legal descriptions, as and if, necessary..

- e. The electrical duct pull vault E-19A filled with concrete as depicted in Exhibits 7, 7a and 7b. Oil with PCBs over 100 ppm was found and removed from the vault. The concrete encasement of the vault and the concrete slab covering this vault, as illustrated in Exhibit 7a, must be maintained in perpetuity per 40 CFR 761.61(a)(8) and the provisions of this Restrictive Covenant.
- f. The former below grade electrical substations and equipment rooms located a minimum of 8 inches beneath the surface of the original concrete floor as depicted on Exhibit 8a and 8b at unknown concentrations. The cap/cover over these designated areas and the concrete and other fill materials must be maintained in perpetuity per 40 CFR Part 761.61(a)(8) and the provisions of this Restrictive Covenant.
- g. Light non-aqueous liquid with PCBs of 86 ppm was identified in monitoring well CRA-086M. The concrete cap (former building slab) in the area depicted in Exhibit 9 and Exhibit 9a must be maintained in perpetuity per 40 CFR Part 761.61(a)(8) and the provisions of this Restrictive Covenant.

3. Activities Prohibited. Owner shall prohibit activities on the TSCA Restricted Area that may damage or disturb any component of the constructed remedy or that may result in exposures to hazardous substances above the nonresidential cleanup criteria. These prohibited activities include:

- a. Installation or use of any below grade device that may penetrate any of the cap or cover materials.
- b. Activities that interfere with, disrupt, damage or cause removal of any element of the corrective measures, including the performance of operation and maintenance activities, monitoring, or other measures necessary to ensure the effectiveness of the cap and cover materials.
- c. Activities that would remove, penetrate, cut into or otherwise disturb the below grade electrical duct system encased in concrete as depicted on Exhibit 10. Any excavation, drilling or other below grade activity within 10 feet either side of the centerline of the surveyed location of the electrical duct system as designated on Exhibit 10.
- d. Constructing a building or structure of any type, in the TSCA Restricted Area except if such building or structure is part of an MDEQ-approved response activity.

Subparts a through d of this provision can be modified or rescinded pursuant to the provisions of Paragraph 10.

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, TSCA, 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. Health and Safety Requirement. The Owner shall follow and require that all contractors follow appropriate Health and Safety requirements for all intrusive excavation activities performed at the Property.
6. Access. The Owner shall grant to MDEQ and USEPA, and the Trust the right to enter the TSCA Restricted Area at 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 TSCA and other applicable federal laws and regulations. The Owner may also grant access to the MDEQ and USEPA to other parts of the Property not described in Exhibit 3 if such access is necessary and appropriate to monitor compliance with this Restrictive Covenant and will not interfere in any material respect with the development of the Property or ongoing business operations and activities of the Owner or any tenant on the Property. Where a request for access includes accessing areas where proprietary activities and operations are occurring, both the Owner and any affected tenant must consent to the request, which consent may not be unreasonably withheld, conditioned or delayed. Nothing herein shall be construed as limiting or restricting, in any manner, the Trust's and MDEQ's access rights under any Environmental Easement Agreement recorded subsequent hereto.
7. Transfer of Interest. The Owner shall provide notice to MDEQ and USEPA, and the Trust at the addresses provided in Paragraph 8 of the Owner'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 Owner 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. Owner 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 _____ 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.

8. Approvals; Notices Any approval that is required to be made by, or obtained from, the Grantor, Trust or the Owner or any affected tenant under this Restrictive Covenant will not be unreasonably withheld by the Grantor, Trust or the Owner or any affected tenant. If a dispute over any such approval occurs, the MDEQ shall make the final approval decision. 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 and shall: include a statement that the notice is being made pursuant to the requirements of this Restrictive Covenant; include the Michigan Facility Identification Number: MID 005 356 688 and MDEQ Reference Numbers: RC-OWMRP-111-15-013; and be served either personally, or sent via first class mail, postage prepaid, as follows:

For MDEQ:

Remediation and Redevelopment Division Chief
Michigan Department of Environmental Quality
P.O. Box 30426
Lansing, MI 48909-7926

and

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

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 the Trust:

Michigan Cleanup Manager
RACER Trust
500 Woodward Avenue, Suite 2650
Detroit, MI 48226

9. Term. This Restrictive Covenant shall run with the Property, and shall be binding on the 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.
10. 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 the part of the Property that includes the TSCA Restricted Area. 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 the part of the Property that includes the TSCA Restricted Area. All remedies available hereunder shall be in addition to any and all other remedies at law or equity.
11. Modification/Release/Rescission. Grantor or Owner may request in writing to MDEQ and USEPA, and the Trust at the addresses provided in Paragraph 7, 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 and USEPA, and the Trust. 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 of such modification or release or rescission returned to MDEQ USEPA, and the Trust at the addresses provided in Paragraph 7.
12. 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.
13. Settlement Agreement and Law. Nothing herein shall be construed as altering or in any way affecting the liability or obligations of the Trust, RACER Properties LLC, and/or the Administrative Trustee under the Settlement Agreement or under applicable law.
14. 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.
15. 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 20107a of NREPA, MCLA 324.20107a, and under the Comprehensive Environmental Response,

Compensation, and Liability Act (CERCLA), 42 U.S.C. §§ 9601, *et seq.* Owner agrees to maintain records of its activities to the extent required by Section 20107a and make copies of any such records upon reasonable request from Grantor or MDEQ or USEPA.

16. 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 Settlement Agreement and the laws 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, not limited to, administrative and judicial remedies under TSCA.
- b) Liberal Construction. Any general rule of construction to the contrary notwithstanding, this Restrictive Covenant shall be liberally construed to effect the purpose of this Restrictive Covenant, and the policy and purpose of TSCA. 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 TSCA matters addressed herein, all of which are merged herein.

[signature page follows]

IN WITNESS WHEREOF, RACER Properties LLC has caused this Restrictive Covenant, RC-OWMRP-111-_____, to be executed on this 4th day of November, 2016.

RACER PROPERTIES LLC

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

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

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

DISTRICT/STATE OF Michigan)
CITY/COUNTY OF Wayne) ss.

The foregoing instrument was acknowledged before me this 4th day of November, 2016, by ELLIOTT P. LAWS, not individually, but acting solely in his capacity as Managing Member of EPLET, LLC, a Delaware limited liability company, acting solely in its capacity as Administrative Trustee of Revitalizing Auto Communities Environmental Response Trust, a New York trust, as Sole Member of RACER Properties LLC, a Delaware limited liability company, on behalf of said limited liability company and said trust.

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

Tracie L. Nichols
Notary Public Signature
Name of Notary Public Tracie L. Nichols
Notary Public, District/State of Michigan
City/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 2650
Detroit, MI 48226

**LIST OF EXHIBITS
TSCA DRC**

Exhibit 1	Legal Description of Property
Exhibit 2	Survey of Property
Exhibit 3	TSCA Restricted Area
Exhibit 4	Powerhouse Basement Location
Exhibit 4a	Powerhouse Basement Delineation Sample Locations
Exhibit 4b	Powerhouse Basement Fill and Cap Cross Section
Exhibit 4c-e	Location of Powerhouse Basement – Legal Survey
Exhibit 5	Substation A (KK7) Location
Exhibit 5a	KK7 Delineation Sample Locations
Exhibit 5b	KK7 Fill and Cap Cross Section
Exhibit 5c-e	Location of KK7 Substation – Legal Survey
Exhibit 6	Substation D Location
Exhibit 6a	Substation D Restricted Area
Exhibit 6b	Substation D Cross Section
Exhibit 6c-e	Location of Substation D Restricted Area – Legal Survey
Exhibit 7	E-19A Vault Location
Exhibit 7a	E-19A Vault Soil Delineation
Exhibit 7b	E-19A Vault Cross Section
Exhibit 7c-e	Location of E-19A Restricted Area – Legal Survey
Exhibit 8	Substations B,C,E,F,G,H & I Locations
Exhibit 8a	Substations B,C,E,F,G,H & I Restricted Areas
Exhibit 8b	Substations B,C,E,F,G,H & I Cross Section
Exhibit 8c-f	Location of Substations Restricted Area – Legal Survey
Exhibit 9	Monitoring Well CRA-086M Location
Exhibit 9a	Monitoring Well CRA-086M Location
Exhibit 9b-d	Location of Monitoring Well CRA-086M Restricted Area – Legal Survey
Exhibit 10	Location of Former Electrical Duct System
Exhibit 10a	PCB Impacted Area Cross Section

EXHIBIT 1
LEGAL DESCRIPTION OF PROPERTY

PROPERTY DESCRIPTIONS FROM DCA SURVEY NO. 20071-REVISED – 10/18/2016

FIRST AMERICAN TITLE INSURANCE COMPANY COMMITMENT FILE NO. 725930, PRINTED OCTOBER 18, 2016, REVISION J - SCHEDULE C:

LAND REFERRED TO IN THIS COMMITMENT, SITUATED IN THE COUNTY OF WAYNE, TOWNSHIP OF VAN BRUEN, STATE OF MICHIGAN, IS DESCRIBED AS FOLLOWS:

PARCEL 1:

THAT PART OF NORTHWEST 1/4 OF SECTION 7, TOWN 3 SOUTH, RANGE 8 EAST, VAN BUREN TOWNSHIP, WAYNE COUNTY, MICHIGAN, DESCRIBED AS: BEGINNING AT THE NORTHWEST CORNER OF SECTION 7 AND PROCEEDING SOUTH 01 DEGREE 25 MINUTES 10 SECONDS WEST ALONG THE WEST SECTION LINE 799.13 FEET; THENCE NORTH 89 DEGREES 57 MINUTES 40 SECONDS EAST 193.19 FEET; THENCE NORTH 00 DEGREES 02 MINUTES 20 SECONDS WEST 275.00 FEET; THENCE SOUTH 89 DEGREES 57 MINUTES 40 SECONDS WEST 153.16 FEET; THENCE NORTH 01 DEGREE 25 MINUTES 10 SECONDS EAST 525.40 FEET; THENCE SOUTH 87 DEGREES 34 MINUTES 10 SECONDS WEST ALONG THE NORTH SECTION LINE 33.07 FEET TO THE POINT OF BEGINNING.

EXCEPT:

PART OF THE NORTHWEST 1/4 OF SECTION 7, TOWN 3 SOUTH, RANGE 8 EAST, VAN BUREN TOWNSHIP, WAYNE COUNTY, MICHIGAN AND BEING MORE PARTICULARLY DESCRIBED AS FOLLOWS: COMMENCING AT THE NORTHEAST CORNER OF SECTION 12, TOWN 3 SOUTH, RANGE 7 EAST, YPSILANTI TOWNSHIP, WASHTENAW COUNTY, MICHIGAN; RUNNING THENCE SOUTH 01 DEGREE 27 MINUTES 26 SECONDS WEST ALONG THE EAST LINE OF SAID SECTION 12, A DISTANCE OF 33.00 FEET TO THE NORTHWEST CORNER OF SECTION 7, TOWN 3 SOUTH, RANGE 8 EAST, VAN BUREN TOWNSHIP, WAYNE COUNTY, MICHIGAN; THENCE NORTH 87 DEGREES 37 MINUTES 30 SECONDS EAST, ALONG THE NORTH LINE OF SAID SECTION 7, A DISTANCE OF 33.07 FEET TO A POINT; THENCE SOUTH 01 DEGREE 27 MINUTES 26 SECONDS WEST A DISTANCE OF 525.40 FEET TO THE POINT OF BEGINNING OF THE PARCEL OF LAND HEREIN BEING DESCRIBED; PROCEEDING THENCE FROM SAID POINT OF BEGINNING NORTH 89 DEGREES 59 MINUTES 58 SECONDS EAST A DISTANCE OF 153.16 FEET TO A POINT; THENCE SOUTH 00 DEGREES 00 MINUTES 04 SECONDS WEST A DISTANCE OF 275.00 FEET TO A POINT; THENCE SOUTH 89 DEGREES 59 MINUTES 58 SECONDS WEST A DISTANCE OF 193.17 FEET TO A POINT ON THE WEST LINE OF SAID SECTION 7; THENCE NORTH 01 DEGREE 27 MINUTES 26 SECONDS EAST ALONG THE WEST LINE OF SAID SECTION 7, A DISTANCE OF 275.10 FEET TO A POINT; THENCE SOUTH 89 DEGREES 58 MINUTES 35 SECONDS EAST A DISTANCE OF 33.01 FEET TO THE POINT OF BEGINNING.

PARCEL 2:

PART OF THE WEST 1/2 OF SECTION 7, TOWN 3 SOUTH, RANGE 8 EAST, VAN BUREN TOWNSHIP, WAYNE COUNTY, MICHIGAN, DESCRIBED AS: BEGINNING AT THE WEST 1/4 CORNER OF SECTION 7; THENCE NORTH 01 DEGREE 27 MINUTES 26 SECONDS EAST 855.18 FEET; THENCE SOUTH 24 DEGREES 17 MINUTES 05 SECONDS EAST 238.53 FEET; THENCE DUE SOUTH 768.31 FEET; THENCE SOUTH 41 DEGREES 23 MINUTES 40 SECONDS WEST 181.57 FEET; THENCE NORTH 00 DEGREES 02 MINUTES 43 SECONDS EAST 287.04 FEET TO THE PLACE OF BEGINNING.

ALSO:

PART OF THE NORTHWEST 1/4 OF SECTION 7, TOWN 3 SOUTH, RANGE 8 EAST, VAN BUREN TOWNSHIP, WAYNE COUNTY, MICHIGAN AND BEING MORE PARTICULARLY DESCRIBED AS FOLLOWS: COMMENCING AT THE NORTHEAST CORNER OF SECTION 12, TOWN 3 SOUTH, RANGE 7 EAST, YPSILANTI TOWNSHIP, WASHTENAW COUNTY, MICHIGAN; RUNNING THENCE SOUTH 01 DEGREE 27 MINUTES 26 SECONDS WEST ALONG THE EAST LINE OF SAID SECTION 12, A DISTANCE OF 33.00 FEET TO THE NORTHWEST CORNER OF SECTION 7, TOWN 3 SOUTH, RANGE 8 EAST, VAN BUREN TOWNSHIP, WAYNE COUNTY, MICHIGAN; THENCE NORTH 87 DEGREES 37 MINUTES 30 SECONDS EAST ALONG THE NORTH LINE OF SAID SECTION 7, A DISTANCE OF 33.07 FEET TO A POINT; THENCE SOUTH 01 DEGREE 27 MINUTES 26 SECONDS WEST A DISTANCE OF 525.40 FEET TO A POINT; THENCE NORTH 89 DEGREES 59 MINUTES 56 SECONDS EAST A DISTANCE OF 153.16 FEET TO A POINT; THENCE SOUTH 00 DEGREES 00 MINUTES 04 SECONDS WEST A DISTANCE OF 275.00 FEET TO A POINT; THENCE SOUTH 89 DEGREES 59 MINUTES 56 SECONDS WEST, ACROSS THE LINE COMMON TO SAID SECTIONS 7 AND 12 AND INTO SAID SECTION 12, A DISTANCE OF 425.10 FEET TO A POINT; THENCE SOUTH 00 DEGREES 00 MINUTES 35 SECONDS WEST

A DISTANCE OF 534.67 FEET TO A POINT; THENCE SOUTH 24 DEGREES 17 MINUTES 05 SECONDS EAST A DISTANCE OF 287.53 FEET TO A POINT; THENCE SOUTH 89 DEGREES 58 MINUTES 35 SECONDS EAST A DISTANCE OF 93.51 FEET TO A POINT ON THE WEST LINE OF SAID SECTION 7, SAID POINT BEING THE POINT OF BEGINNING OF THE PARCEL OF LAND HEREIN BEING DESCRIBED; PROCEEDING THENCE FROM SAID POINT OF BEGINNING SOUTH 89 DEGREES 58 MINUTES 35 SECONDS EAST A DISTANCE OF 93.07 FEET TO A POINT; THENCE SOUTH A DISTANCE OF 413.48 FEET TO A POINT; THENCE NORTH 24 DEGREES 17 MINUTES 05 SECONDS WEST A DISTANCE OF 238.46 FEET TO A POINT ON THE WEST LINE OF SAID SECTION 7; THENCE NORTH 01 DEGREE 27 MINUTES 26 SECONDS EAST ALONG THE WEST LINE OF SAID SECTION 7, A DISTANCE OF 196.22 FEET TO THE POINT OF BEGINNING.

EXCEPT THAT PART OF THE FOLLOWING DESCRIPTION LYING WITHIN ABOVE PARCEL 2:

PART OF THE WEST 1/2 OF SECTION 7, TOWN 3 SOUTH, RANGE 8 EAST, VAN BUREN TOWNSHIP, WAYNE COUNTY, MICHIGAN AND BEING MORE PARTICULARLY DESCRIBED AS FOLLOWS: BEGINNING AT THE WEST 1/4 CORNER OF SECTION 7, TOWN 3 SOUTH, RANGE 8 EAST, VAN BUREN TOWNSHIP, WAYNE COUNTY, MICHIGAN AND PROCEEDING THENCE FROM SAID POINT OF BEGINNING NORTH 01 DEGREE 27 MINUTES 26 SECONDS EAST, ALONG THE WEST LINE OF SAID SECTION 7, A DISTANCE OF 477.35 FEET TO A POINT; THENCE SOUTH 89 DEGREES 58 MINUTES 00 SECONDS EAST A DISTANCE OF 107.72 FEET TO A POINT; THENCE DUE SOUTH A DISTANCE OF 829.09 FEET TO A POINT; THENCE SOUTH 89 DEGREES 42 MINUTES 46 SECONDS WEST A DISTANCE OF 120.09 FEET TO A POINT ON THE WEST LINE OF SAID SECTION 7; THENCE NORTH 00 DEGREES 02 MINUTES 43 SECONDS EAST A DISTANCE OF 352.56 FEET TO THE POINT OF BEGINNING.

LAND IN THE COUNTY OF WASHTENAW, TOWNSHIP OF YPSILANTI, STATE OF MICHIGAN, IS DESCRIBED AS FOLLOWS:

PARCEL 3:

PART OF SECTION 12 AND THE SOUTHEAST 1/4 OF SECTION 1, TOWN 3 SOUTH, RANGE 7 EAST, YPSILANTI TOWNSHIP, WASHTENAW COUNTY, MICHIGAN, DESCRIBED AS BEGINNING AT NORTHEAST CORNER SECTION 12, THENCE SOUTH 01 DEGREES 27 MINUTES 26 SECONDS WEST 557.02 FEET ALONG EAST LINE SAID SECTION; THENCE NORTH 89 DEGREES 58 MINUTES 35 SECONDS WEST 994.29 FEET; THENCE SOUTH 00 DEGREES 01 MINUTES 25 SECONDS WEST 892.33 FEET; THENCE SOUTH 44 DEGREES 58 MINUTES 35 SECONDS EAST 253.84 FEET; THENCE SOUTH 89 DEGREES 58 MINUTES 35 SECONDS EAST 787.98 FEET; THENCE SOUTH 01 DEGREE 27 MINUTES 26 SECONDS WEST 1051.74 FEET ALONG EAST LINE SAID SECTION 12 TO EAST 1/4 CORNER SAID SECTION 12; THENCE SOUTH 00 DEGREES 02 MINUTES 43 SECONDS WEST 352.58 FEET ALONG EAST LINE SAID SECTION 12; THENCE SOUTH 89 DEGREES 42 MINUTES 46 SECONDS WEST 141.66 FEET; THENCE NORTH 40.00 FEET; THENCE NORTH 75 DEGREES 54 MINUTES 30 SECONDS WEST 404.79 FEET; THENCE WEST 473.73 FEET; THENCE SOUTH 00 DEGREES 08 MINUTES 45 SECONDS WEST 241.25 FEET; THENCE SOUTH 77 DEGREES 57 MINUTES 35 SECONDS WEST 4.93 FEET; THENCE SOUTH 00 DEGREES 03 MINUTES 01 SECONDS WEST 1102.74 FEET; THENCE ALONG ARC OF CURVE, CONCAVE TO THE NORTHEAST, RADIUS 334.72 FEET ARC DISTANCE 295.12 FEET CHORD SOUTH 25 DEGREES 12 MINUTES 33 MINUTES EAST 285.66 FEET; THENCE NORTH 64 DEGREES 36 MINUTES 55 SECONDS WEST 204.04 FEET; THENCE ALONG THE ARC OF A CURVE, CONCAVE TO THE NORTHEAST, RADIUS 3233.20 FEET ARC DISTANCE 454.26 FEET CHORD NORTH 60 DEGREES 35 MINUTES 25 SECONDS WEST 453.89 FEET; THENCE NORTH 56 DEGREES 33 MINUTES 55 SECONDS WEST 1484.43 FEET; THENCE ALONG ARC OF CURVE, CONCAVE TO THE NORTHEAST, RADIUS 3739.90 FEET ARC DISTANCE 130.30 FEET CHORD NORTH 55 DEGREES 34 MINUTES 02 SECONDS WEST 130.29 FEET; THENCE NORTH 54 DEGREES 34 MINUTES 09 SECONDS WEST 359.48 FEET; THENCE NORTH 89 DEGREES 55 MINUTES 54 SECONDS WEST 905.78 FEET; THENCE NORTH 00 DEGREES 03 MINUTES 30 SECONDS WEST 28.13 FEET; THENCE NORTH 75 DEGREES 21 MINUTES 04 SECONDS WEST 751.41 FEET; THENCE NORTH 34 DEGREES 14 MINUTES 31 SECONDS WEST 264.14 FEET; THENCE NORTH 17 DEGREES 41 MINUTES 20 SECONDS WEST 42.89 FEET; THENCE SOUTH 43 DEGREES 54 MINUTES 37 SECONDS EAST 4.23 FEET; THENCE NORTH 07 DEGREES 38 MINUTES 28 SECONDS EAST 76.94 FEET; THENCE NORTH 00 DEGREES 17 MINUTES 13 SECONDS WEST 116.77 FEET; THENCE NORTH 16 DEGREES 30 MINUTES 35 SECONDS EAST 91.37 FEET; THENCE NORTH 70 DEGREES 10 MINUTES 04 SECONDS EAST 76.60 FEET; THENCE SOUTH 89 DEGREES 59 MINUTES 08 SECONDS EAST 132.93 FEET; THENCE NORTH 74 DEGREES 57 MINUTES 39 SECONDS EAST 103.97 FEET; THENCE NORTH 62 DEGREES 44 MINUTES 44 SECONDS EAST 117.99 FEET; THENCE NORTH 56 DEGREES 19 MINUTES 26 SECONDS EAST 63.37 FEET; THENCE SOUTH 81 DEGREES 47 MINUTES 24 SECONDS EAST 95.70 FEET; THENCE SOUTH 41 DEGREES 29 MINUTES 39 SECONDS EAST 127.51 FEET;

THENCE SOUTH 20 DEGREES 59 MINUTES 39 SECONDS EAST 62.61 FEET; THENCE SOUTH 32 DEGREES 49 MINUTES 49 SECONDS WEST 51.48 FEET; THENCE SOUTH 11 DEGREES 53 MINUTES 00 SECONDS EAST 98.90 FEET; THENCE SOUTH 24 DEGREES 51 MINUTES 44 SECONDS EAST 167.55 FEET; THENCE SOUTH 26 DEGREES 55 MINUTES 41 SECONDS EAST 107.14 FEET; THENCE SOUTH 52 DEGREES 06 MINUTES 00 SECONDS EAST 67.16 FEET; THENCE SOUTH 73 DEGREES 01 MINUTES 57 SECONDS EAST 106.85 FEET; THENCE NORTH 89 DEGREES 36 MINUTES 14 SECONDS EAST 79.13 FEET; THENCE NORTH 71 DEGREES 50 MINUTES 27 SECONDS EAST 44.80 FEET; THENCE NORTH 31 DEGREES 22 MINUTES 45 SECONDS EAST 28.47 FEET; THENCE NORTH 01 DEGREE 45 MINUTES 03 SECONDS EAST 109.79 FEET; THENCE NORTH 09 DEGREES 38 MINUTES 11 SECONDS WEST 83.57 FEET; THENCE NORTH 51 DEGREES 10 MINUTES 30 SECONDS WEST 83.14 FEET; THENCE NORTH 35 DEGREES 44 MINUTES 20 SECONDS WEST 153.06 FEET; THENCE NORTH 44 DEGREES 45 MINUTES 42 SECONDS WEST 23.25 FEET; THENCE NORTH 17 DEGREES 35 MINUTES 43 SECONDS WEST 218.61 FEET; THENCE NORTH 16 DEGREES 24 MINUTES 34 SECONDS WEST 80.48 FEET; THENCE NORTH 33 DEGREES 34 MINUTES 36 SECONDS WEST 80.53 FEET; THENCE NORTH 20 DEGREES 43 MINUTES 09 SECONDS WEST 80.28 FEET; THENCE NORTH 02 DEGREES 37 MINUTES 46 SECONDS EAST 88.24 FEET; THENCE NORTH 16 DEGREES 05 MINUTES 51 SECONDS WEST 94.03 FEET; THENCE NORTH 10 DEGREES 35 MINUTES 29 SECONDS WEST 115.58 FEET; THENCE NORTH 25 DEGREES 11 MINUTES 25 SECONDS WEST 44.91 FEET; THENCE NORTH 11 DEGREES 32 MINUTES 30 SECONDS WEST 65.19 FEET; THENCE NORTH 13 DEGREES 43 MINUTES 37 SECONDS EAST 67.50 FEET; THENCE NORTH 60 DEGREES 18 MINUTES 26 SECONDS EAST 70.74 FEET; THENCE NORTH 89 DEGREES 01 MINUTES 39 SECONDS EAST 43.05 FEET; THENCE NORTH 60 DEGREES 36 MINUTES 22 SECONDS EAST 39.60 FEET; THENCE NORTH 75 DEGREES 28 MINUTES 45 SECONDS EAST 118.86 FEET; THENCE NORTH 40 DEGREES 42 MINUTES 55 SECONDS EAST 43.95 FEET; THENCE NORTH 69 DEGREES 36 MINUTES 11 SECONDS EAST 46.74 FEET; THENCE NORTH 20 DEGREES 37 MINUTES 49 SECONDS EAST 90.38 FEET TO POINT ON WESTERLY LINE OF RAILROAD R/W 100 FEET WIDE; THENCE SOUTH 04 DEGREES 36 MINUTES 50 SECONDS EAST 125.71 FEET ALONG SAID RAILROAD R/W LINE; THENCE NORTH 69 DEGREES 34 MINUTES 21 SECONDS EAST 69.21 FEET; THENCE NORTH 69 DEGREES 33 MINUTES 20 SECONDS EAST 34.73 FEET TO A POINT ON EASTERLY LINE OF SAID RAILROAD R/W; THENCE NORTH 04 DEGREES 36 MINUTES 50 SECONDS WEST 328.62 FEET ALONG EASTERLY LINE OF SAID RAILROAD R/W; THENCE ALONG THE ARC OF A CURVE, CONCAVE TO THE WEST, RADIUS 1462.69 FEET ARC DISTANCE 419.53 FEET CHORD NORTH 12 DEGREES 49 MINUTES 50 SECONDS WEST 418.09 FEET ALONG EASTERLY LINE OF SAID RAILROAD R/W; THENCE NORTH 20 DEGREES 55 MINUTES 15 SECONDS WEST 284.08 FEET ALONG EASTERLY LINE OF SAID RAILROAD R/W; THENCE FOLLOWING COURSES AND DISTANCE ALONG SOUTHERLY LINE ECORSE ROAD (M-17/US-12 BY-PASS), ALONG THE ARC OF A CURVE CONCAVE TO THE SOUTH, RADIUS 3967.56 FEET ARC DISTANCE 669.08 FEET, CHORD NORTH 73 DEGREES 52 MINUTES 13 SECONDS EAST 668.29 FEET; THENCE NORTH 78 DEGREES 42 MINUTES 05 SECONDS EAST 326.43 FEET; THENCE ALONG THE ARC OF A CURVE CONCAVE TO THE SOUTHWEST RADIUS 618.70 FEET ARC DISTANCE 845.04 FEET CHORD SOUTH 62 DEGREES 04 MINUTES 00 SECONDS EAST 780.87 FEET; THENCE SOUTH 22 DEGREES 10 MINUTES 00 SECONDS WEST 200.92 FEET; THENCE NORTH 61 DEGREES 05 MINUTES 34 SECONDS EAST 290.02 FEET; THENCE NORTH 81 DEGREES 03 MINUTES 56 SECONDS EAST 55.20 FEET; THENCE NORTH 00 DEGREES 01 MINUTE 50 SECONDS WEST 170.15 FEET; THENCE NORTH 89 DEGREES 57 MINUTES 30 SECONDS EAST 180.74 FEET; THENCE SOUTH 00 DEGREES 02 MINUTES 30 SECONDS EAST 70.42 FEET; THENCE NORTH 61 DEGREES 07 MINUTES 04 SECONDS EAST 275.27 FEET; THENCE ALONG THE ARC OF A CURVE CONCAVE TO THE SOUTHEAST RADIUS 2185.04 FEET ARC DISTANCE 177.67 FEET CHORD NORTH 14 DEGREES 11 MINUTES 51 SECONDS EAST 177.62 FEET; THENCE ALONG THE ARC OF A CURVE CONCAVE TO THE SOUTHEAST RADIUS 469.38 FEET ARC DISTANCE 509.49 FEET CHORD NORTH 47 DEGREES 37 MINUTES 21 SECONDS EAST 484.84 FEET; THENCE NORTH 78 DEGREES 43 MINUTES 06 SECONDS EAST 1050.35 FEET; THENCE ALONG THE ARC OF A CURVE CONCAVE TO THE SOUTH RADIUS 2161.92 FEET ARC DISTANCE 178.46 FEET CHORD NORTH 81 DEGREES 04 MINUTES 59 SECONDS EAST 178.41 FEET; THENCE SOUTH 45 DEGREES 13 MINUTES 15 SECONDS EAST 186.15 FEET TO THE EAST LINE OF SAID SECTION 1; THENCE SOUTH 03 DEGREES 46 MINUTES 45 SECONDS WEST 319.00 FEET ALONG EAST LINE OF SAID SECTION 1 TO POINT OF BEGINNING.

EXCEPT:

PART OF EAST 1/2 SECTION 12, TOWN 3 SOUTH, RANGE 7 EAST, YPSILANTI TOWNSHIP, WASHTENAW COUNTY, MICHIGAN DESCRIBED COMMENCING NORTHEAST CORNER SECTION 12 AND RUNNING THENCE SOUTH 01 DEGREE 27 MINUTES 26 SECONDS WEST ALONG THE EAST LINE OF SAID SECTION 12, 33.00 FEET TO THE NORTHWEST CORNER OF SECTION 7, TOWN 3 SOUTH, RANGE 8 EAST, VAN

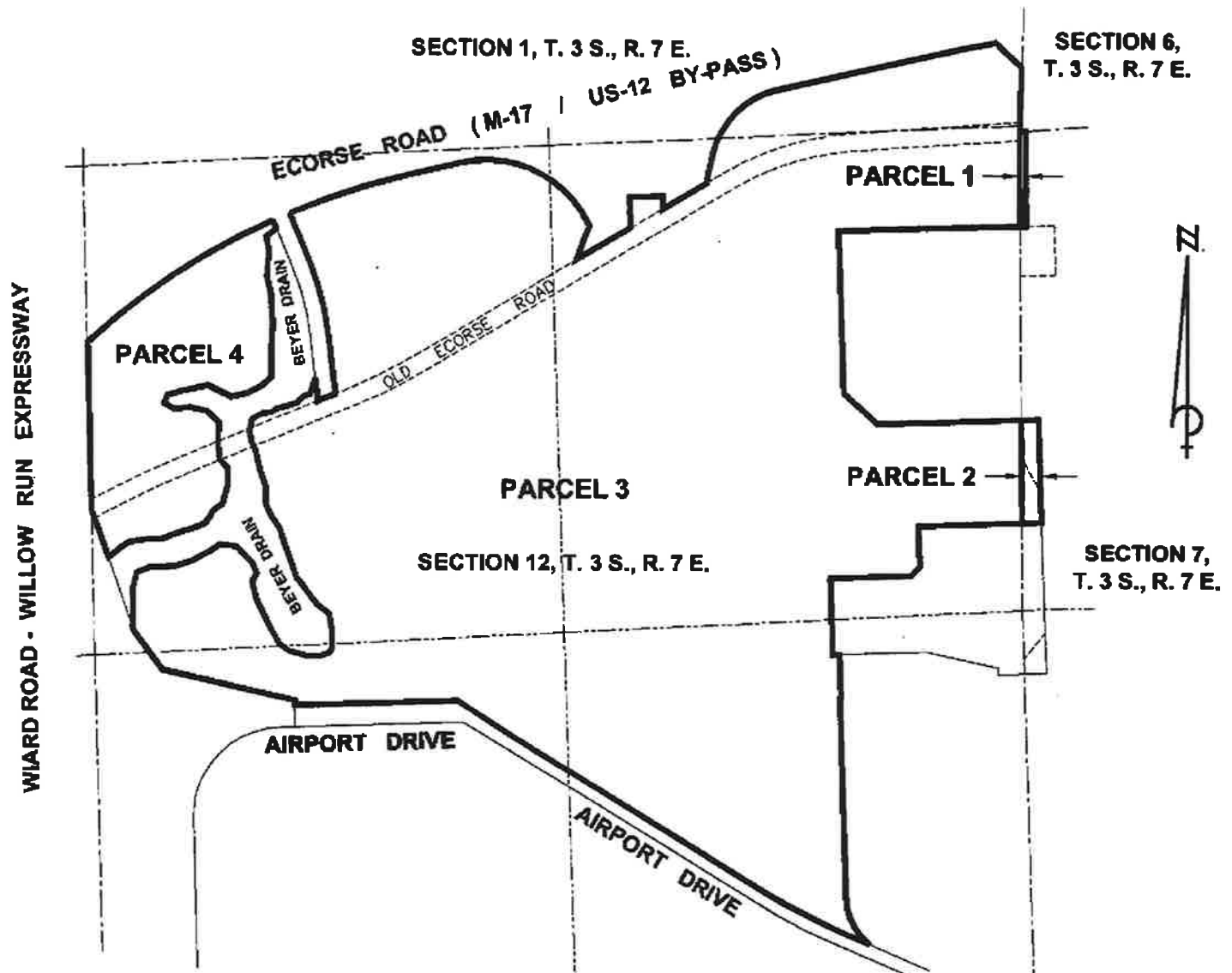
BUREN TOWNSHIP, WAYNE COUNTY, MICHIGAN; THENCE NORTH 87 DEGREES 37 MINUTES 30 SECONDS EAST ALONG THE NORTH LINE OF SAID SECTION 7, 33.07 FEET; THENCE SOUTH 01 DEGREE 27 MINUTES 26 SECONDS WEST ALONG A LINE PARALLEL WITH THE LINE COMMON TO SAID SECTIONS 7 AND 12, 525.40 FEET TO A POINT; THENCE NORTH 89 DEGREES 58 MINUTES 35 SECONDS WEST CROSSING SAID COMMON SECTION LINE, 1027.30 FEET TO A POINT IN THE INTERIOR OF SAID SECTION 12; THENCE SOUTH 00 DEGREES 01 MINUTES 25 SECONDS WEST 892.33 FEET TO A POINT; THENCE SOUTH 44 DEGREES 58 MINUTES 35 SECONDS EAST 253.84 FEET TO A POINT; THENCE SOUTH 89 DEGREES 58 MINUTES 35 SECONDS EAST 787.98 FEET TO POINT ON THE EAST LINE OF SAID SECTION 12; THENCE SOUTH 01 DEGREE 27 MINUTES 26 SECONDS WEST 574.39 FEET TO THE POINT OF BEGINNING; PROCEEDING THENCE FROM SAID POINT OF BEGINNING SOUTH 01 DEGREE 27 MINUTES 26 SECONDS WEST ALONG THE EAST LINE OF SAID SECTION 12, 477.35 FEET TO THE EAST 1/4 CORNER OF SAID SECTION 12; THENCE SOUTH 00 DEGREES 02 MINUTES 43 SECONDS WEST ALONG THE EAST LINE OF SAID SECTION 12, 352.56 FEET TO A POINT; THENCE SOUTH 89 DEGREES 42 MINUTES 46 SECONDS WEST 141.66 FEET TO A POINT; THENCE NORTH 40.00 FEET TO A POINT; THENCE NORTH 75 DEGREES 54 MINUTES 30 SECONDS WEST 404.79 FEET TO A POINT; THENCE WEST 512.11 FEET TO A POINT; THENCE NORTH 00 DEGREES 02 MINUTES 00 SECONDS EAST 418.67 FEET TO A POINT; THENCE SOUTH 89 DEGREES 58 MINUTES 00 SECONDS EAST 443.50 FEET TO A POINT; THENCE NORTH 45 DEGREES 02 MINUTES 00 SECONDS EAST 69.30 FEET TO A POINT; THENCE NORTH 00 DEGREES 02 MINUTES 00 SECONDS EAST 224.85 FEET TO A POINT; THENCE SOUTH 89 DEGREES 58 MINUTES 00 SECONDS EAST 565.84 FEET TO THE POINT OF BEGINNING.

PARCEL 4:

PART OF NORTHWEST 1/4 OF SECTION 12, TOWN 3 SOUTH, RANGE 7 EAST, YPSILANTI TOWNSHIP, WASHTENAW COUNTY, MICHIGAN, DESCRIBED AS COMMENCING AT A POINT ON THE WEST LINE OF SECTION 12, DISTANT SOUTH 00 DEGREES 27 MINUTES 23 SECONDS WEST 966.09 FEET, AS MEASURED ALONG SAID SECTION LINE, FROM THE NORTHWEST CORNER OF SAID SECTION; PROCEEDING THENCE FROM SAID POINT OF BEGINNING ALONG SOUTHERLY LINE ECORSE ROAD (M-17/US-12 BY-PASS) ALONG THE ARC OF A CURVE CONCAVE TO THE SOUTHEAST RADIUS 3967.56 FEET ARC DISTANT 1235.00 FEET CHORD NORTH 58 DEGREES 39 MINUTES 51 SECONDS EAST 1230.02 FEET; THENCE SOUTH 20 DEGREES 55 MINUTES 15 SECONDS EAST 50.00 FEET ALONG WESTERLY LINE OF RAILROAD R/W 100 FEET WIDE; THENCE SOUTH 53 DEGREES 48 MINUTES 59 SECONDS WEST 71.30 FEET; THENCE SOUTH 08 DEGREES 34 MINUTES 55 SECONDS EAST 83.90 FEET; THENCE SOUTH 07 DEGREES 04 MINUTES 52 SECONDS WEST 137.67 FEET; THENCE SOUTH 11 DEGREES 57 MINUTES 20 SECONDS E 101.65 FEET; THENCE SOUTH 01 DEGREE 33 MINUTES 01 SECONDS EAST 127.84 FEET; THENCE SOUTH 02 DEGREES 01 MINUTES 48 SECONDS WEST 73.23 FEET; THENCE SOUTH 05 DEGREES 10 MINUTES 51 SECONDS WEST 98.66 FEET; THENCE SOUTH 02 DEGREES 06 MINUTES 41 SECONDS WEST 153.11 FEET; THENCE SOUTH 50 DEGREES 19 MINUTES 07 SECONDS WEST 74.99 FEET; THENCE SOUTH 64 DEGREES 54 MINUTES 53 SECONDS WEST 87.17 FEET; THENCE SOUTH 78 DEGREES 29 MINUTES 01 SECONDS WEST 90.60 FEET; THENCE NORTH 62 DEGREES 36 MINUTES 10 SECONDS WEST 144.02 FEET; THENCE SOUTH 79 DEGREES 41 MINUTES 35 SECONDS WEST 135.41 FEET; THENCE SOUTH 76 DEGREES 01 MINUTE 50 SECONDS WEST 96.30 FEET; THENCE SOUTH 21 DEGREES 00 MINUTES 09 SECONDS WEST 47.96 FEET; THENCE SOUTH 56 DEGREES 54 MINUTES 29 SECONDS EAST 63.20 FEET; THENCE NORTH 85 DEGREES 30 MINUTES 36 SECONDS EAST 89.47 FEET; THENCE SOUTH 74 DEGREES 40 MINUTES 08 SECONDS EAST 93.32 FEET; THENCE SOUTH 46 DEGREES 01 MINUTE 17 SECONDS EAST 92.21 FEET; THENCE SOUTH 04 DEGREES 37 MINUTES 27 SECONDS WEST 113.77 FEET; THENCE SOUTH 04 DEGREES 57 MINUTES 08 SECONDS EAST 92.83 FEET; THENCE SOUTH 44 DEGREES 23 MINUTES 10 SECONDS EAST 61.99 FEET; THENCE SOUTH 00 DEGREES 42 MINUTES 15 SECONDS WEST 85.68 FEET; THENCE SOUTH 17 DEGREES 03 MINUTES 22 SECONDS WEST 54.40 FEET; THENCE SOUTH 17 DEGREES 21 MINUTES 29 SECONDS WEST 68.54 FEET; THENCE SOUTH 58 DEGREES 55 MINUTES 04 SECONDS WEST 55.22 FEET; THENCE SOUTH 35 DEGREES 03 MINUTES 54 SECONDS WEST 92.30 FEET; THENCE SOUTH 70 DEGREES 49 MINUTES 58 SECONDS WEST 75.01 FEET; THENCE SOUTH 74 DEGREES 32 MINUTES 42 SECONDS WEST 91.61 FEET; THENCE SOUTH 69 DEGREES 02 MINUTES 34 SECONDS WEST 86.16 FEET; THENCE NORTH 88 DEGREES 37 MINUTES 01 SECONDS WEST 78.27 FEET; THENCE SOUTH 83 DEGREES 46 MINUTES 45 SECONDS WEST 104.57 FEET; THENCE SOUTH 58 DEGREES 22 MINUTES 14 SECONDS WEST 58.17 FEET; THENCE SOUTH 52 DEGREES 53 MINUTES 19 SECONDS WEST 87.86 FEET TO A POINT ON EASTERLY LINE WILLOW RUN EXPRESSWAY; THENCE NORTH 17 DEGREES 41 MINUTES 20 SECONDS WEST 281.68 FEET ALONG EASTERLY LINE OF SAID WILLOW RUN EXPRESSWAY TO POINT ON WEST LINE SECTION 12; THENCE NORTH 00 DEGREES 27 MINUTES 23 SECONDS EAST 927.30 FEET

ALONG WEST LINE SECTION 12 AND SAID EASTERLY LINE OF SAID WILLOW RUN EXPRESSWAY TO
POINT OF BEGINNING.

EXHIBIT 2
SURVEY OF PROPERTY



David C. Adams & Son
Professional Land Surveyors, Inc.
25517 Five Mile Road
Detroit, Michigan 48220
Tel: 313-636-1222
Fax: 313-636-4438
www.DCASurveys.com

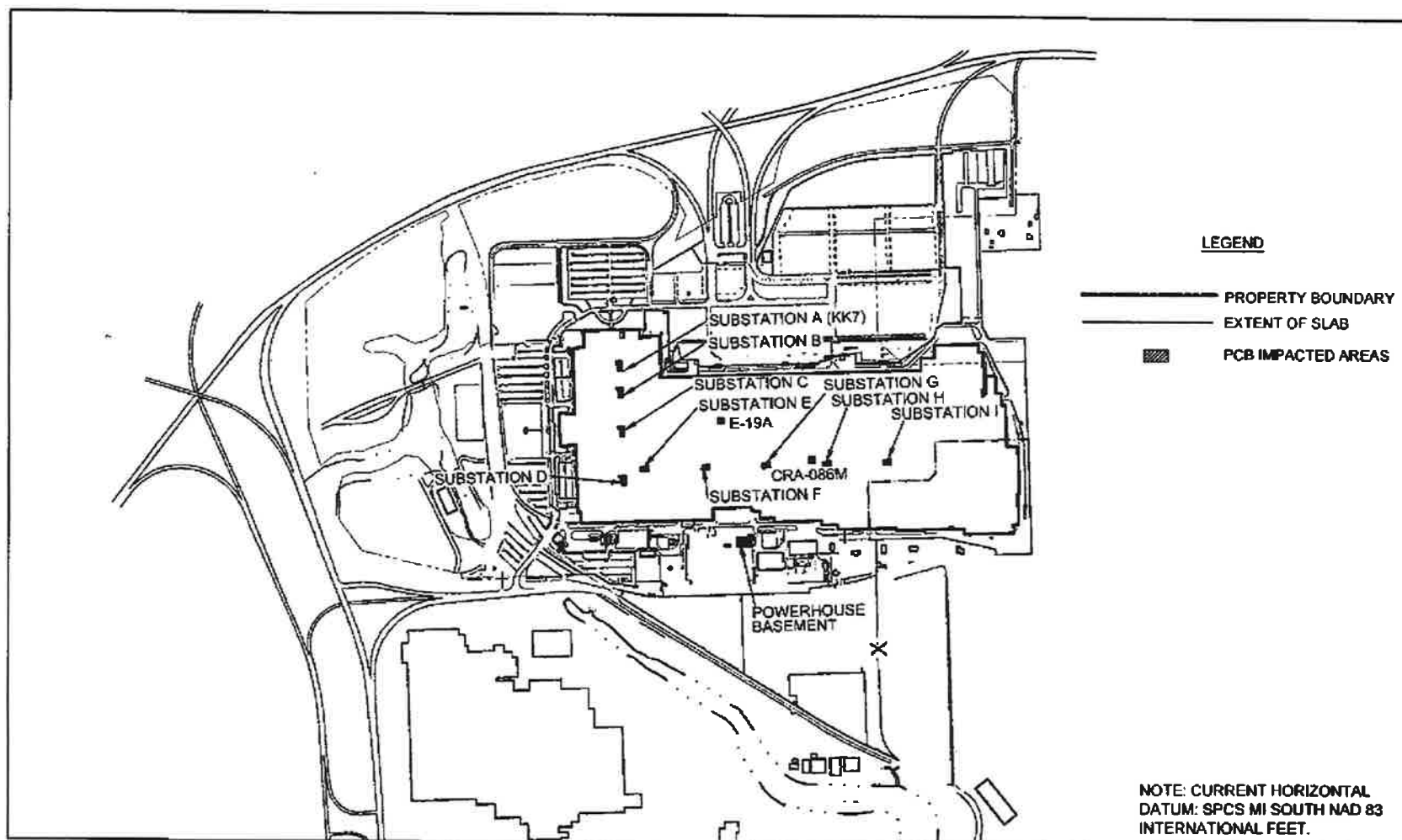
PROJECT MAP
SCALE: NONE

YPSILANTI TWP.
WASHTENAW CO.

VAN BUREN TWP.
WAYNE CO.

TSCA DRC
Exhibit 2

EXHIBIT 3
TSCA RESTRICTED AREA

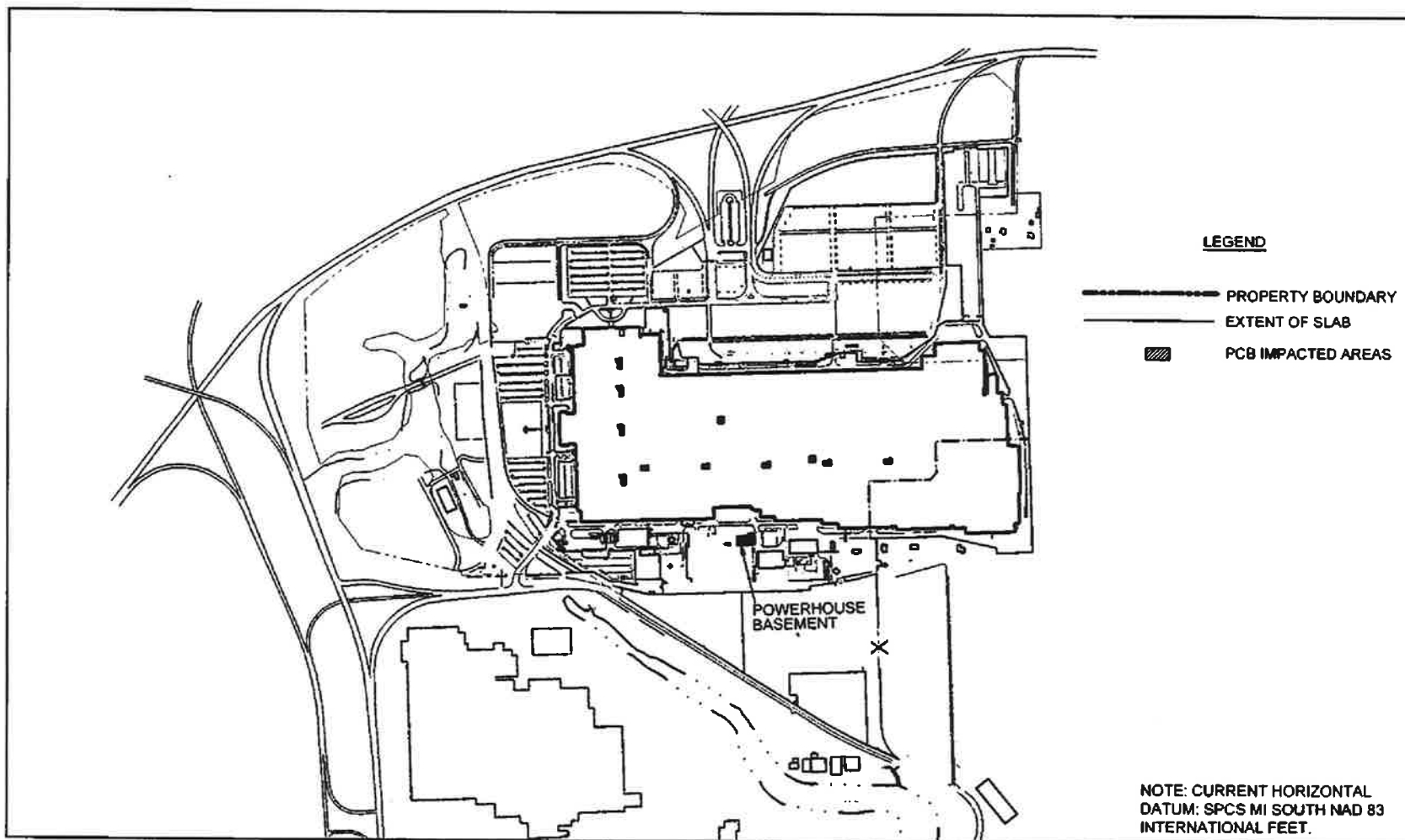


FORMER POWERTRAIN PLANT
YPSILANTI MICHIGAN
TSCA RESTRICTED AREA
PCB RESTRICTIVE COVENANT

081613-09
Oct 28, 2016

**TSCA DRC
EXHIBIT 3**

EXHIBIT 4
POWERHOUSE BASEMENT



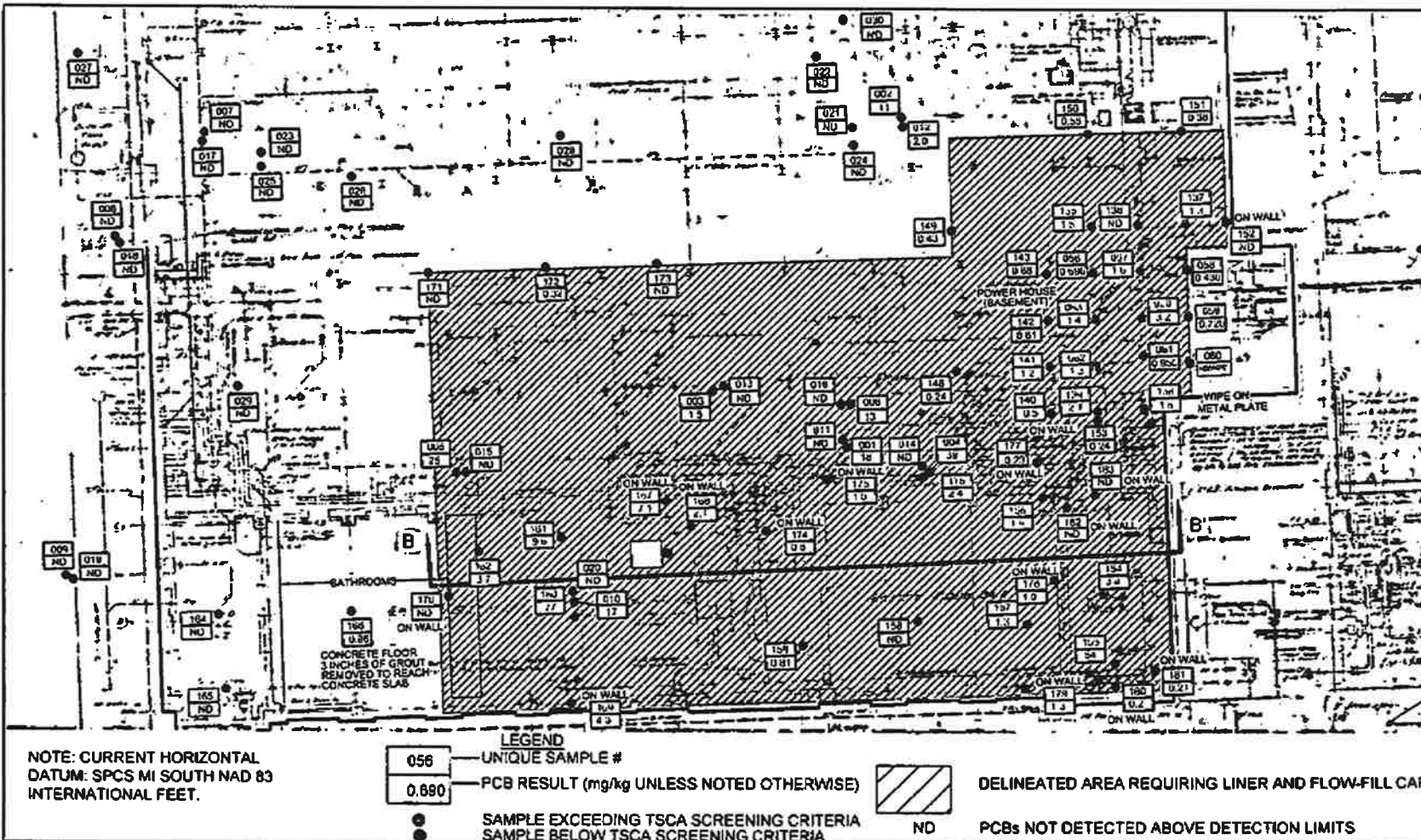
0 500 1000ft



FORMER POWERTRAIN PLANT
YPSILANTI MICHIGAN
POWERHOUSE BASEMENT LOCATION
PCB RESTRICTIVE COVENANT

081613-09
Oct 28, 2016

**TSCA DRC
EXHIBIT 4**



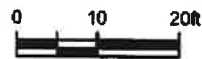
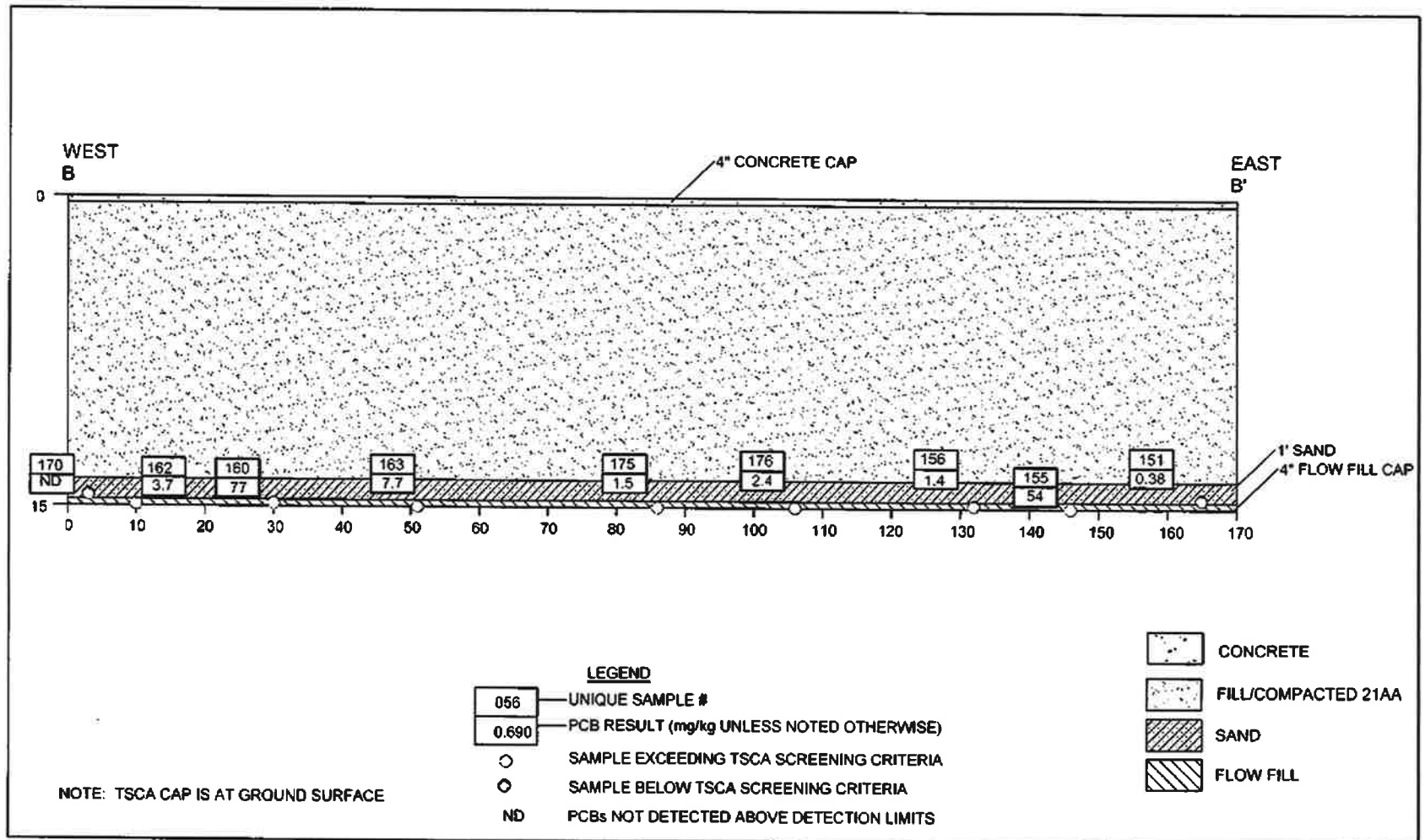
Source: ALBERT KAHN ASSOCIATES DRAWING POWER HOUSE FOR AIRPLANE PARTS MANUFACTURING BUILDING JOB No. 18688 SHEET 18-M, BASEMENT AND OPERATING FLOOR PLANS, PLUMBING, HEATING, AND VENTILATION ISSUED 5/1/1942.



FORMER POWERTRAIN PLANT
YPSILANTI, MICHIGAN
PCB RESTRICTIVE COVENANT
POWERHOUSE BASEMENT DE

081613-09
Nov 2, 2016

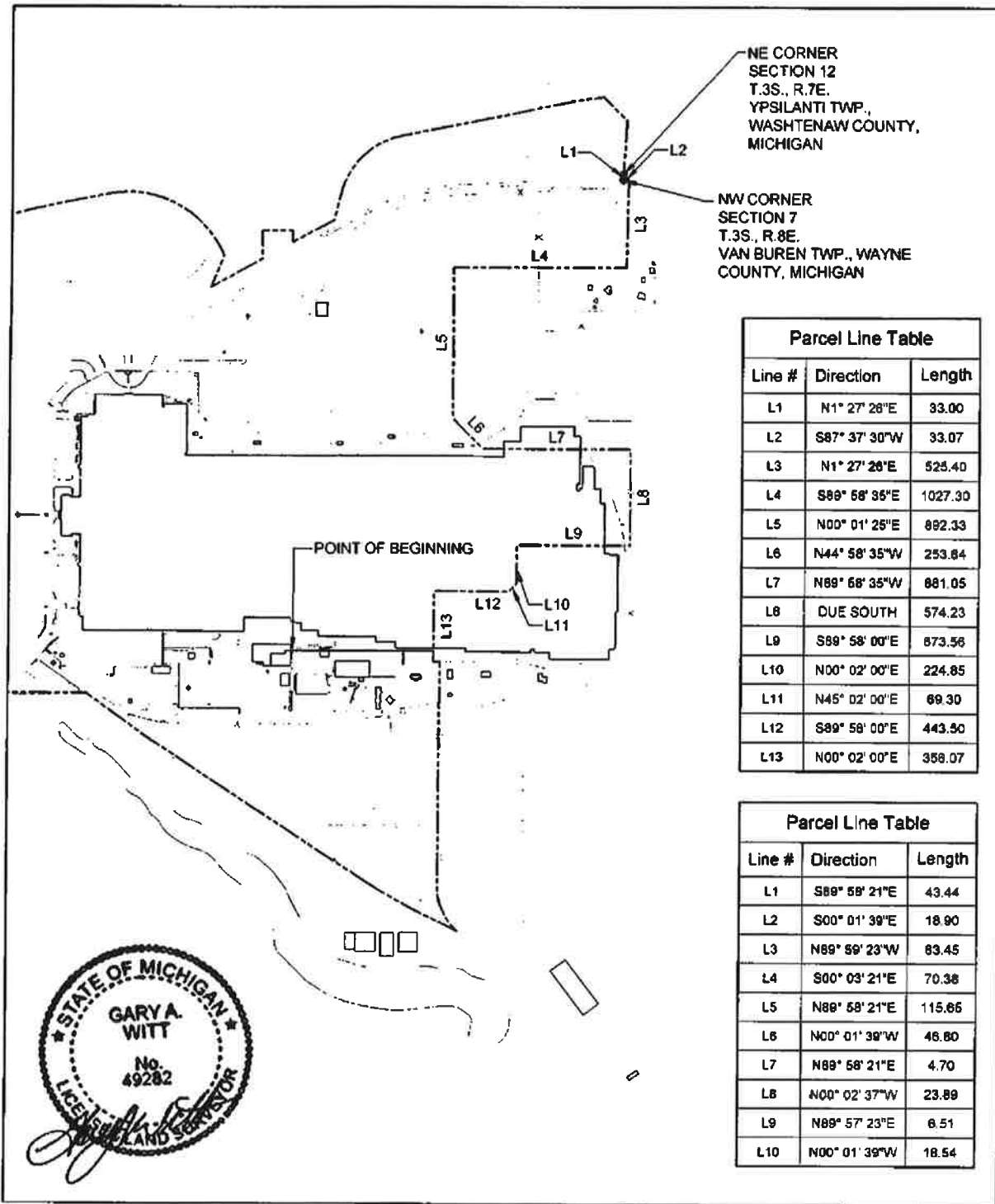
TSCA DRC
EXHIBIT 4a

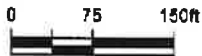
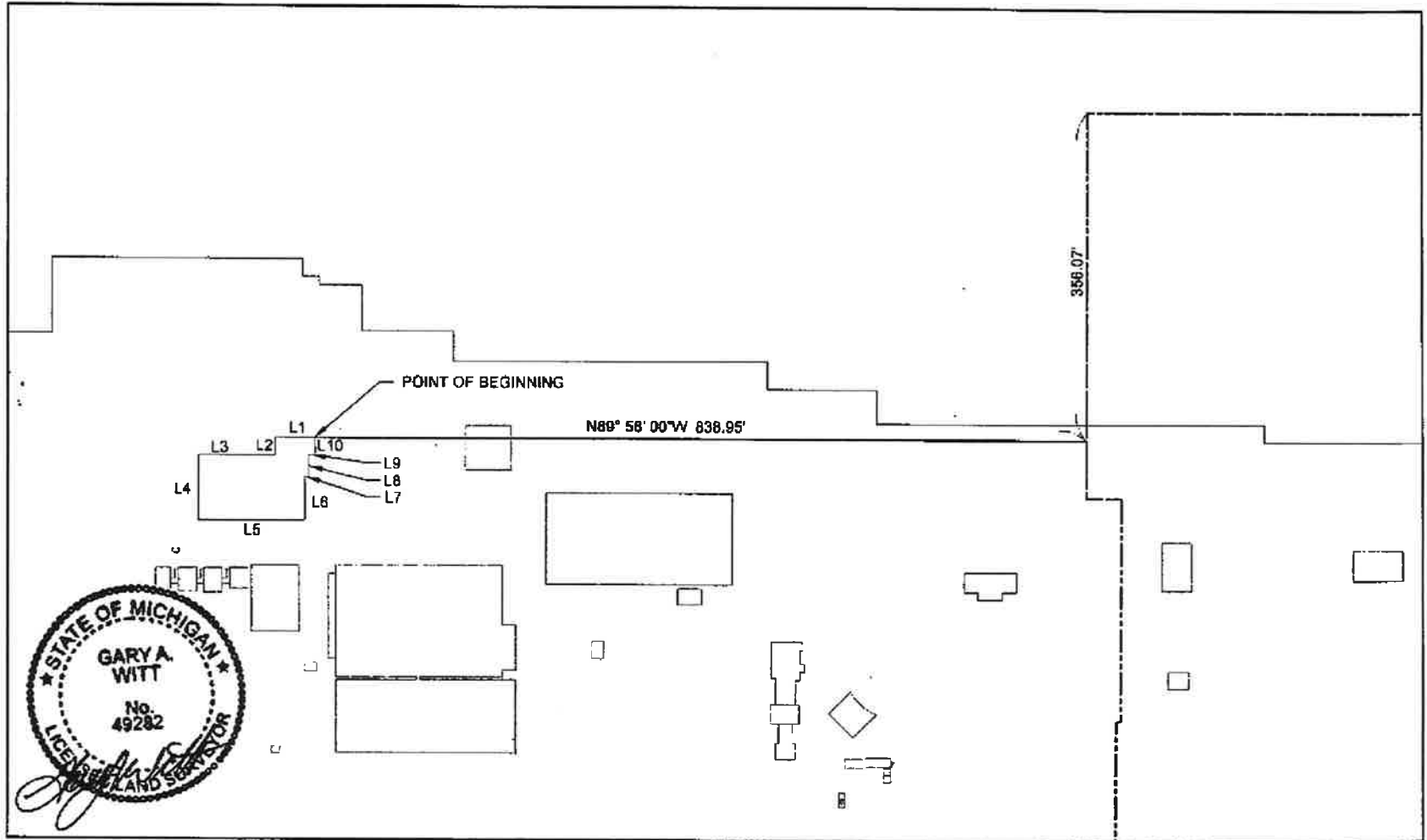


FORMER POWERTRAIN PLANT
YPSILANTI, MICHIGAN
PCB RESTRICTIVE COVENANT
POWERHOUSE BASEMENT FILL AND CAP CROSS SECTION

081613-09
Nov 3, 2016

TSCA DRC
EXHIBIT 4b





FORMER POWERTRAIN PLANT
YPSILANTI, MICHIGAN

RESTRICTIVE COVENANT
LOCATION OF FORMER POWERHOUSE BASEMENT

081613-09
Nov 1, 2016

TSCA DRC
EXHIBIT 4d

POWERHOUSE BASEMENT

Part of Section 7, T3S-R8E, Van Buren Township, Wayne County, Michigan and part of Sections 1 and 12, T3S-R7E, Ypsilanti Township, Washtenaw County, Michigan, more particularly described as follows: Commencing at the Northeast Corner of Section 12, T3S-R7E, Ypsilanti Township, Wayne County, Michigan, thence along the East line of Section 12, S 01°27'26" W, 33.00 feet to the Northwest Corner of Section 7, T3S-R8E, Van Buren Township, Wayne County, Michigan; thence along the North line of Section 7, N 87°37'30" E 33.07 feet; thence along a line parallel to the West line of Section 7, S 01°27'26" W, 525.40 feet; thence N 89°58'35" W, 1027.30 feet; thence S 00°01'25" W, 892.33 feet; thence S 44°58'35" E, 253.84 feet; thence S 89°58'35" E, 881.05 feet; thence due South 574.23 feet; thence N 89°58'00" W, 673.56 feet; thence S 00°02'00" W, 224.85 feet; thence S 45°02'00" W, 69.30 feet; thence N 89°58'00" W, 443.50 feet; thence S 00°02'00" W, 356.07 feet; thence N 89°58'00" W, 838.95 feet, to the POINT OF BEGINNING of the parcel to be described; thence S 89°58'21" W, 43.44 feet; thence S 00°01'39" E, 18.90 feet; thence N 89°59'23" W, 83.45 feet; thence S 00°03'21" E, 70.38 feet; thence N 89°58'21" E, 115.65 feet; thence N 00°01'39" W, 46.80 feet; thence N 89°58'21" E, 4.70 feet; thence N 00°02'37" W, 23.89 feet; thence N 89°57'23" E, 6.51 feet; thence N 00°01'39" W, 18.54 feet; thence due North, 0.00 feet to the POINT OF BEGINNING, containing 0.21 acres, more or less.



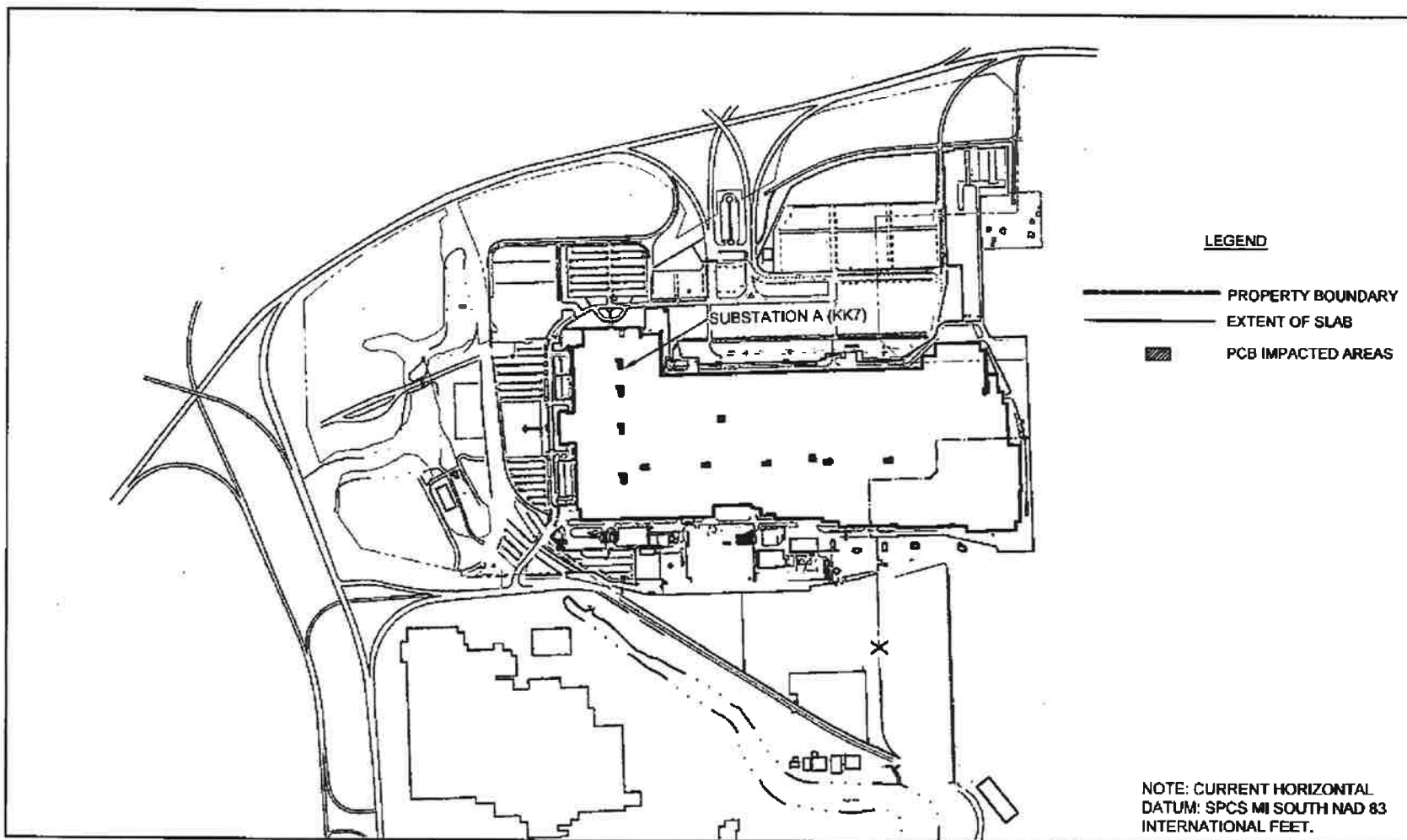
FORMER POWERTRAIN PLANT
YPSILANT, MICHIGAN

RESTRICTIVE COVENANT
LOCATION OF POWERHOUSE BASEMENT

081613-09
Oct. 31, 2016

TSCA DRC
Exhibit 4e

EXHIBIT 6
SUBSTATION A (KK7)

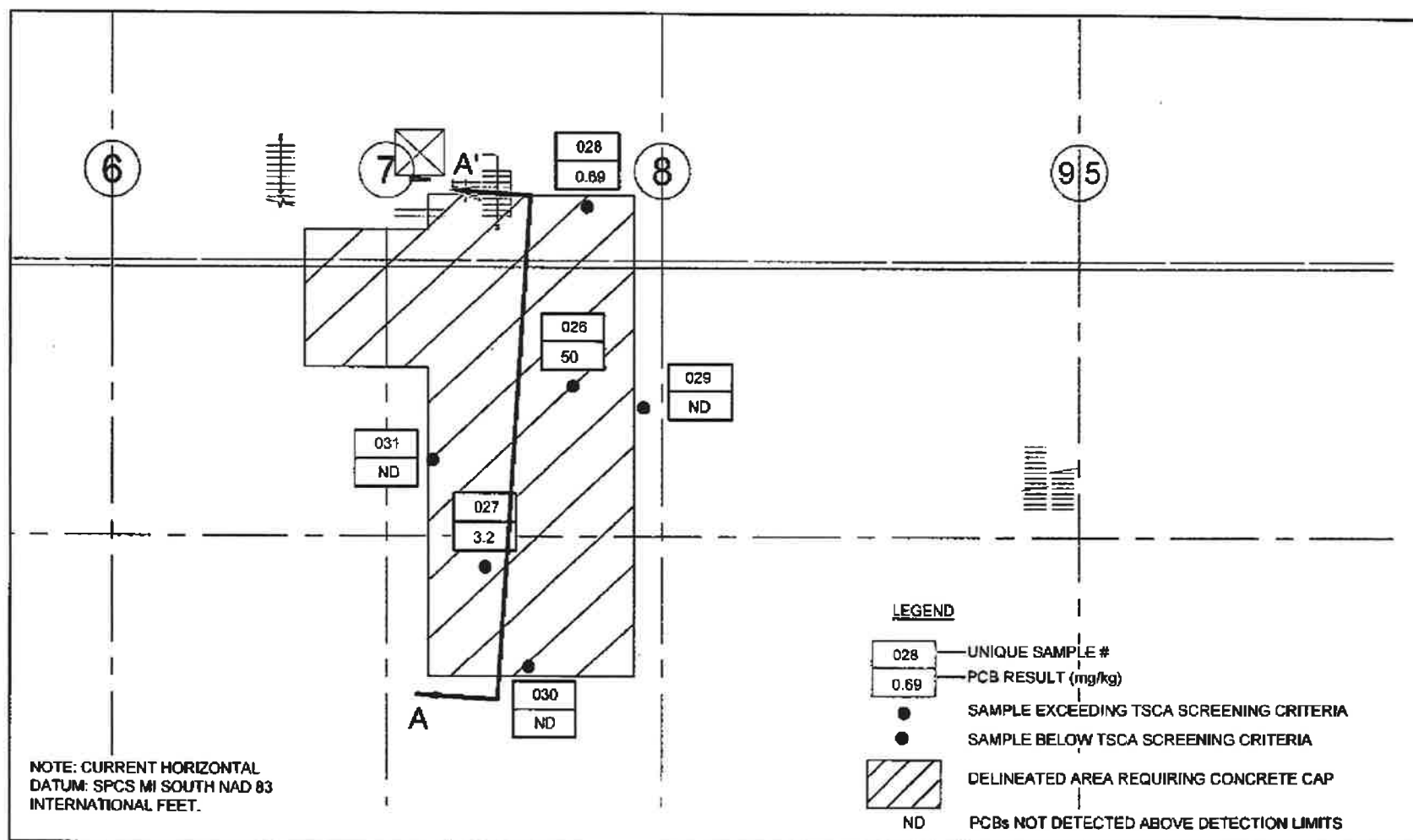


FORMER POWERTRAIN PLANT
YPSILANTI MICHIGAN
SUBSTATION A (KK7) LOCATION
PCB RESTRICTIVE COVENANT

081613-09
Oct 28, 2016

**TSCA DRC
EXHIBIT 5**

CAD File: MdnewinprB1000\9081613\081613-PRES081613-08(PRES020)\081613-08(PRES020)\GNW081613-08(PRES020)\GN-D6011.dwg



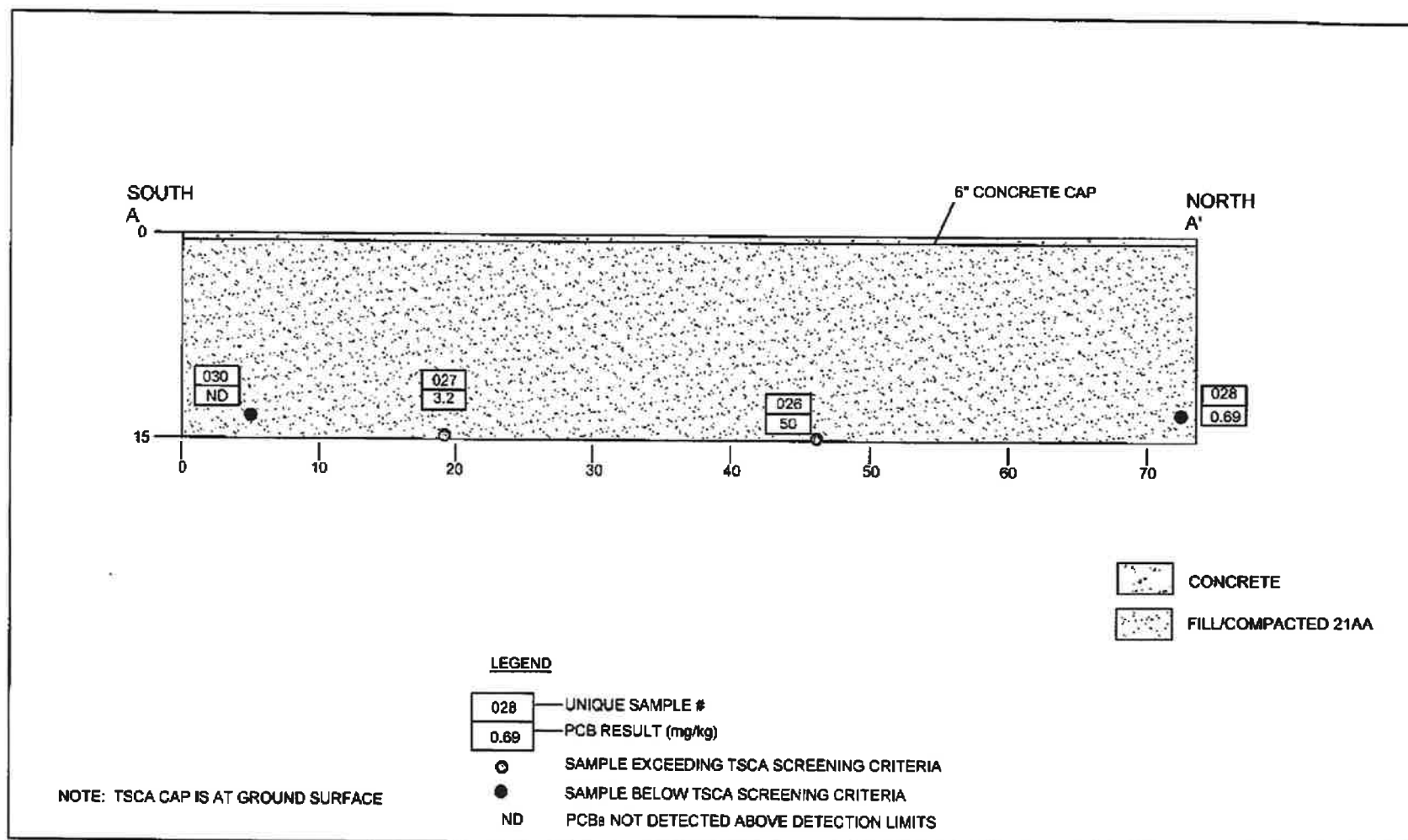
0 10 20ft



FORMER POWERTRAIN PLANT
YPSILANTI, MICHIGAN
PCB RESTRICTIVE COVENANT
KK7 DELINEATION SAMPLE LOCATIONS

081613-09
Oct 28, 2016

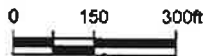
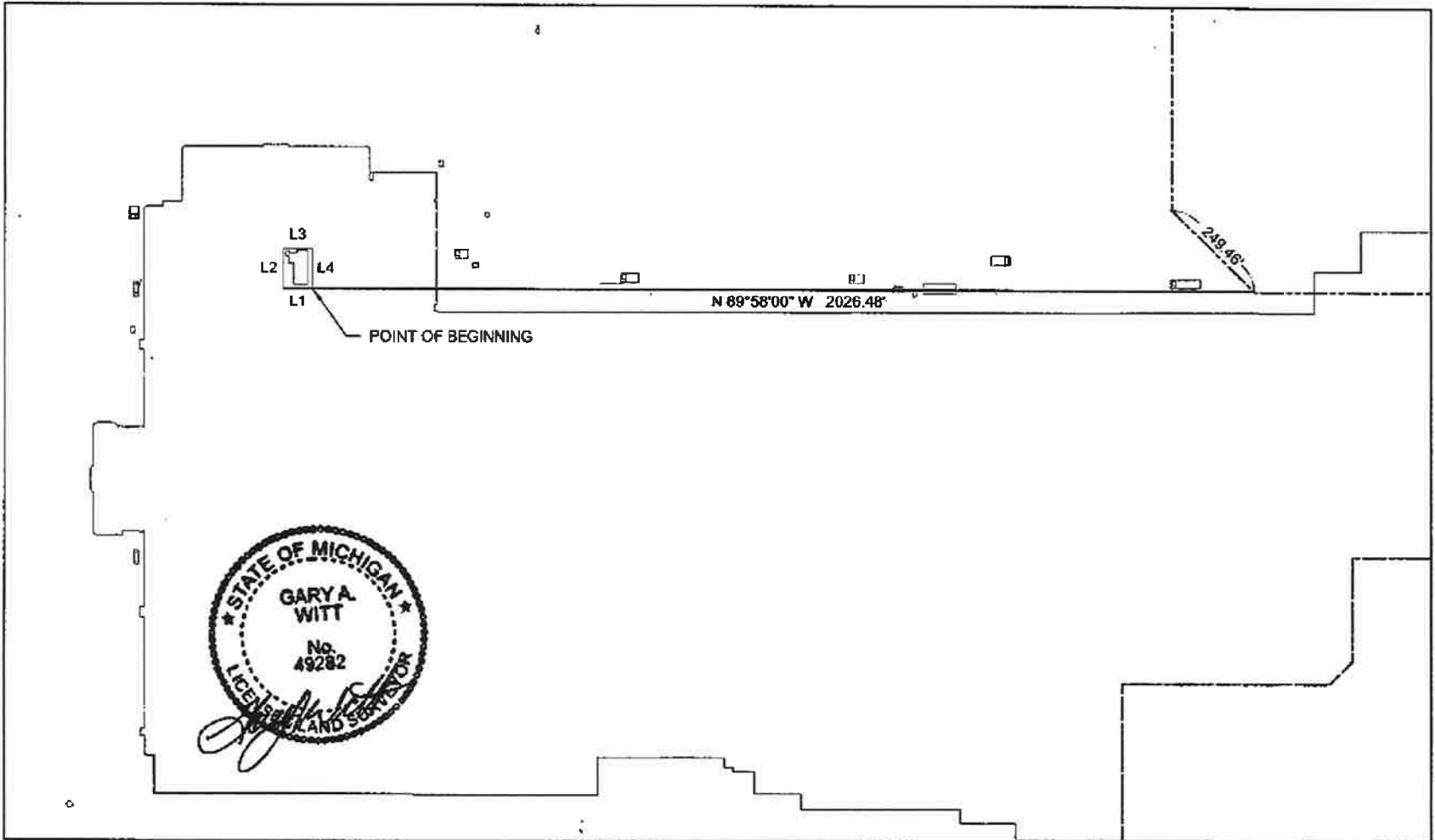
TSCA DRC
EXHIBIT 5a



FORMER POWERTRAIN PLANT
YPSILANTI, MICHIGAN
PCB RESTRICTIVE COVENANT
KK7 FILL AND CAP CROSS SECTION

081613-09
Nov 3, 2016

TSCA DRC
EXHIBIT 5b



FORMER POWERTRAIN PLANT
YPSILANTI, MICHIGAN

RESTRICTIVE COVENANT
LOCATION OF FORMER KK7 SUBSTATION

081613-09
Nov 2, 2016

TSCA DRC
EXHIBIT 5d

KK7 SUBSTATION

Part of Section 7, T3S-R8E, Van Buren Township, Wayne County, Michigan and part of Sections 1 and 12, T3S-R7E, Ypsilanti Township, Washtenaw County, Michigan, more particularly described as follows: Commencing at the Northeast Corner of Section 12, T3S-R7E, Ypsilanti Township, Wayne County, Michigan, thence along the East line of Section 12, S 01°27'26" W, 33.00 feet to the Northwest Corner of Section 7, T3S-R8E, Van Buren Township, Wayne County, Michigan; thence along the North line of Section 7, N 87°37'30" E 33.07 feet; thence along a line parallel to the West line of Section 7, S 01°27'26" W, 525.40 feet; thence N 89°58'35" W, 1027.30 feet; thence S 00°01'25" W, 892.33 feet; thence S 44°58'35" E, 249.46 feet; thence N 89°58'00" W, 2026.48 feet, to the POINT OF BEGINNING of the parcel to be described; thence S 89°57'20" W, 64.24 feet; thence N 00°02'40" W, 85.73 feet; thence N 89°57'20" E, 64.24 feet; thence S 00°02'40" E, 85.73 feet to the POINT OF BEGINNING, containing 0.13 acres, more or less.



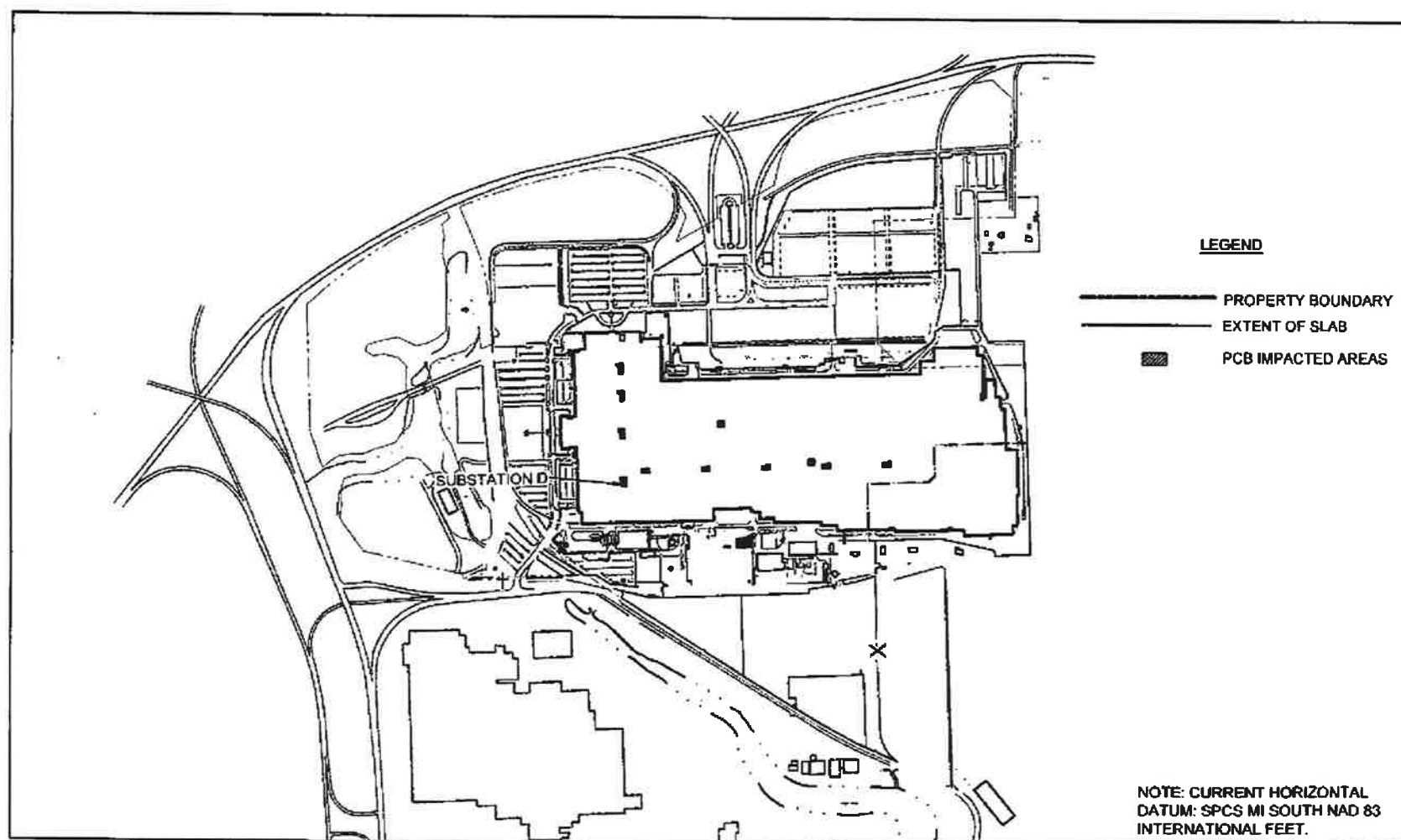
FORMER POWERTRAIN PLANT
YPSILANT, MICHIGAN

RESTRICTIVE COVENANT
LOCATION OF FORMER KK7 SUBSTATION

081613-09
Nov. 1, 2016

TSCA DRC
Exhibit 5e

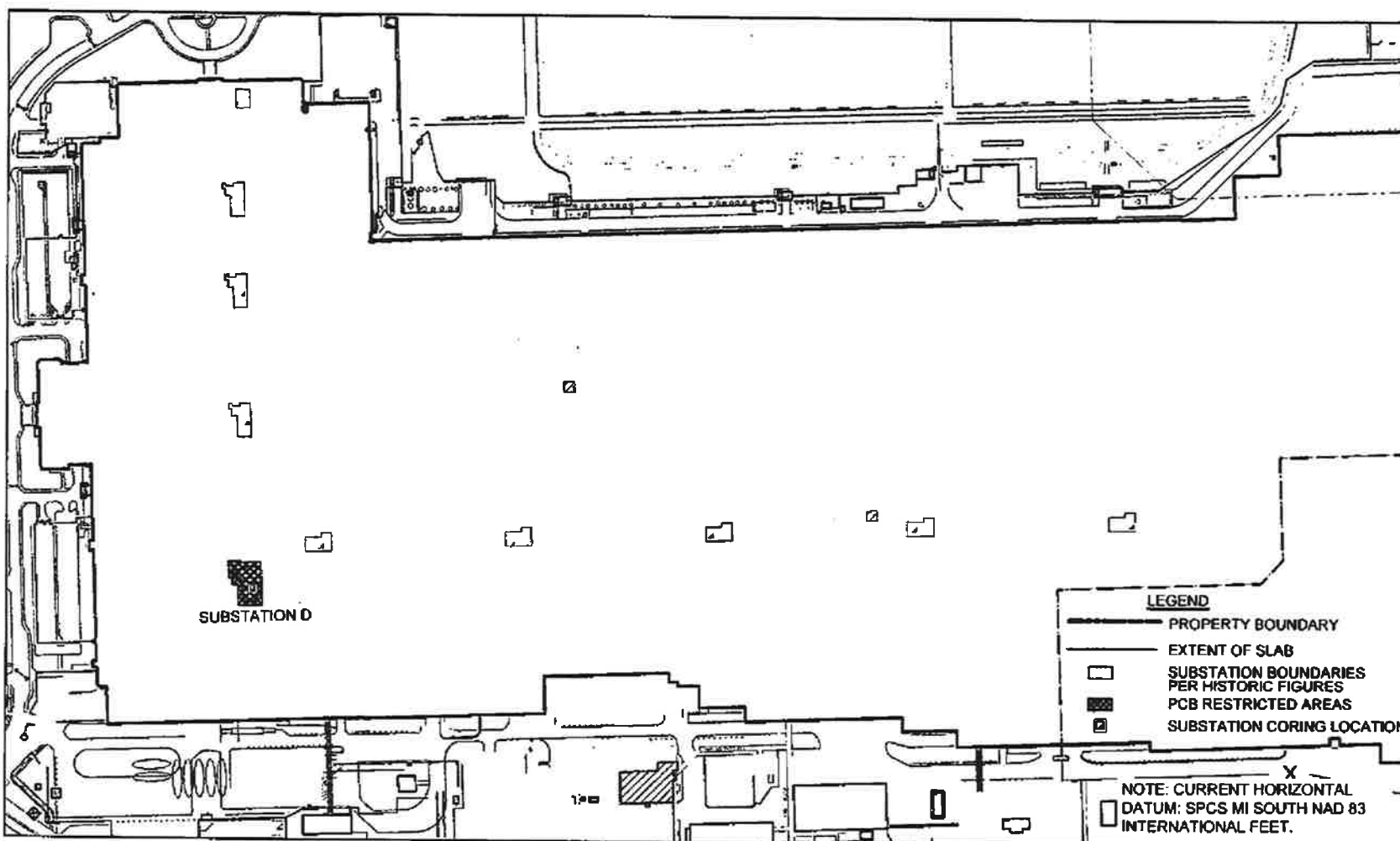
EXHIBIT 6
SUBSTATION D



FORMER POWERTRAIN PLANT
YPSILANTI MICHIGAN
SUBSTATION D LOCATION
PCB RESTRICTIVE COVENANT

081613-09
Oct 28, 2016

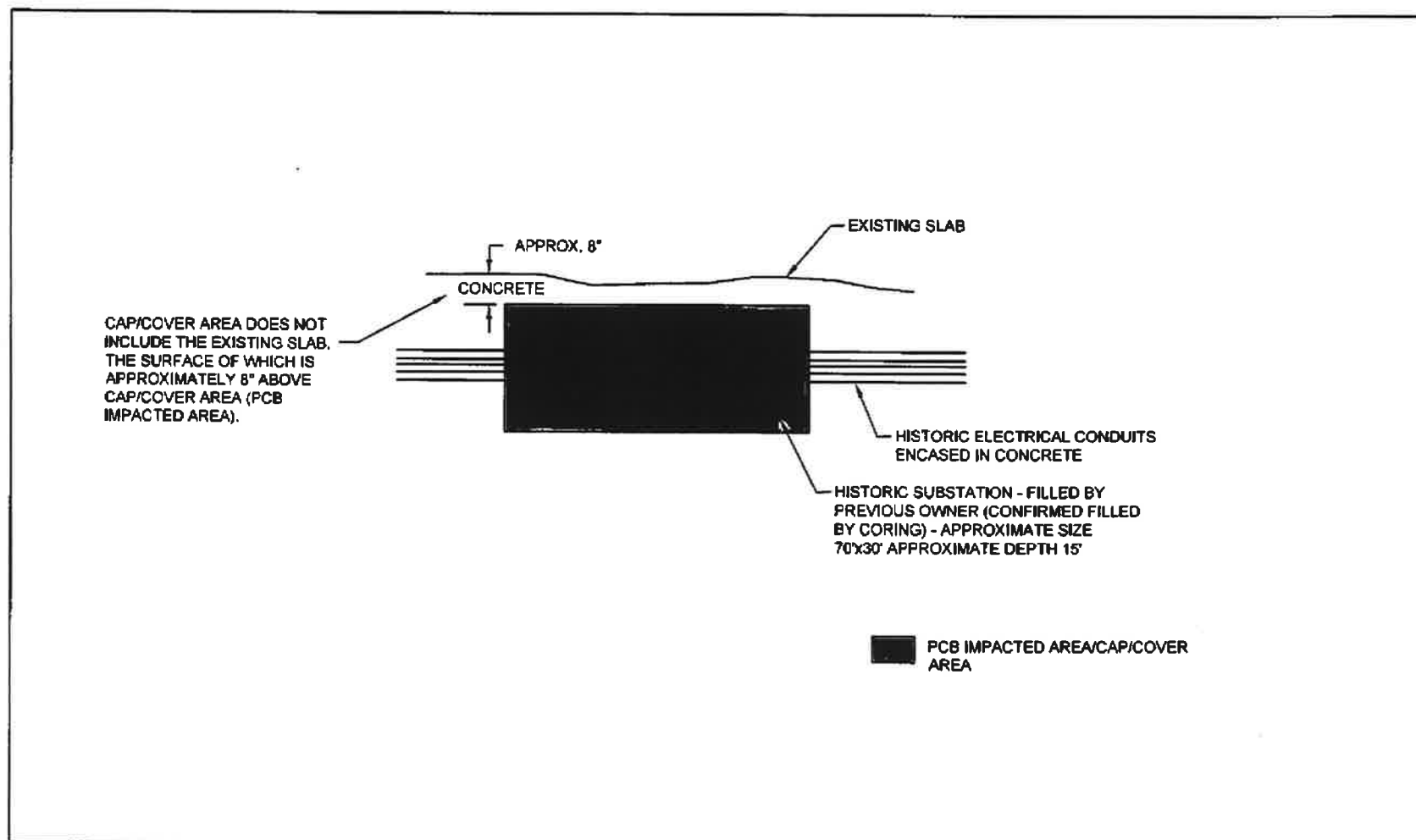
TSCA DRC
EXHIBIT 6



**FORMER POWERTRAIN PLANT
YPSILANTI MICHIGAN
SUBSTATION D RESTRICTED AREA
PCB RESTRICTIVE COVENANT**

081613-09
Oct 28, 2016

TSCA DRC
EXHIBIT 6a



**FORMER POWERTRAIN PLANT
YPSILANTI MICHIGAN
SUBSTATION D CROSS SECTION
PCB RESTRICTIVE COVENANT**

081613-09
Nov 2, 2016

TSCA DRC
EXHIBIT 6b

SUBSTATION D

Part of Section 7, T3S-R8E, Van Buren Township, Wayne County, Michigan and part of Sections 1 and 12, T3S-R7E, Ypsilanti Township, Washtenaw County, Michigan, more particularly described as follows: Commencing at the Northeast Corner of Section 12, T3S-R7E, Ypsilanti Township, Wayne County, Michigan, thence along the East line of Section 12, S 01°27'26" W, 33.00 feet to the Northwest Corner of Section 7, T3S-R8E, Van Buren Township, Wayne County, Michigan; thence along the North line of Section 7, N 87°37'30" E 33.07 feet; thence along a line parallel to the West line of Section 7, S 01°27'26" W, 525.40 feet; thence N 89°58'35" W, 1027.30 feet; thence S 00°01'25" W, 892.33 feet; thence S 44°58'35" E, 253.84 feet; thence S 89°58'35" E, 881.05 feet; thence due South 574.23 feet; thence N 89°58'00" W, 673.56 feet; thence S 00°02'00" W, 224.85 feet; thence S 45°02'00" W, 69.30 feet; thence N 89°58'00" W, 443.50 feet; thence S 00°02'00" W, 356.07 feet; thence N 89°58'00" W, 838.95 feet, to the POINT OF BEGINNING of the parcel to be described; thence S 89°58'21" W, 43.44 feet; thence S 00°01'39" E, 18.90 feet; thence N 89°59'23" W, 83.45 feet; thence S 00°03'21" E, 70.38 feet; thence N 89°58'21" E, 115.65 feet; thence N 00°01'39" W, 46.80 feet; thence N 89°58'21" E, 4.70 feet; thence N 00°02'37" W, 23.89 feet; thence N 89°57'23" E, 6.51 feet; thence N 00°01'39" W, 18.54 feet; thence due North, 0.00 feet to the POINT OF BEGINNING, containing 0.21 acres, more or less.



FORMER POWERTRAIN PLANT
YPSILANT, MICHIGAN

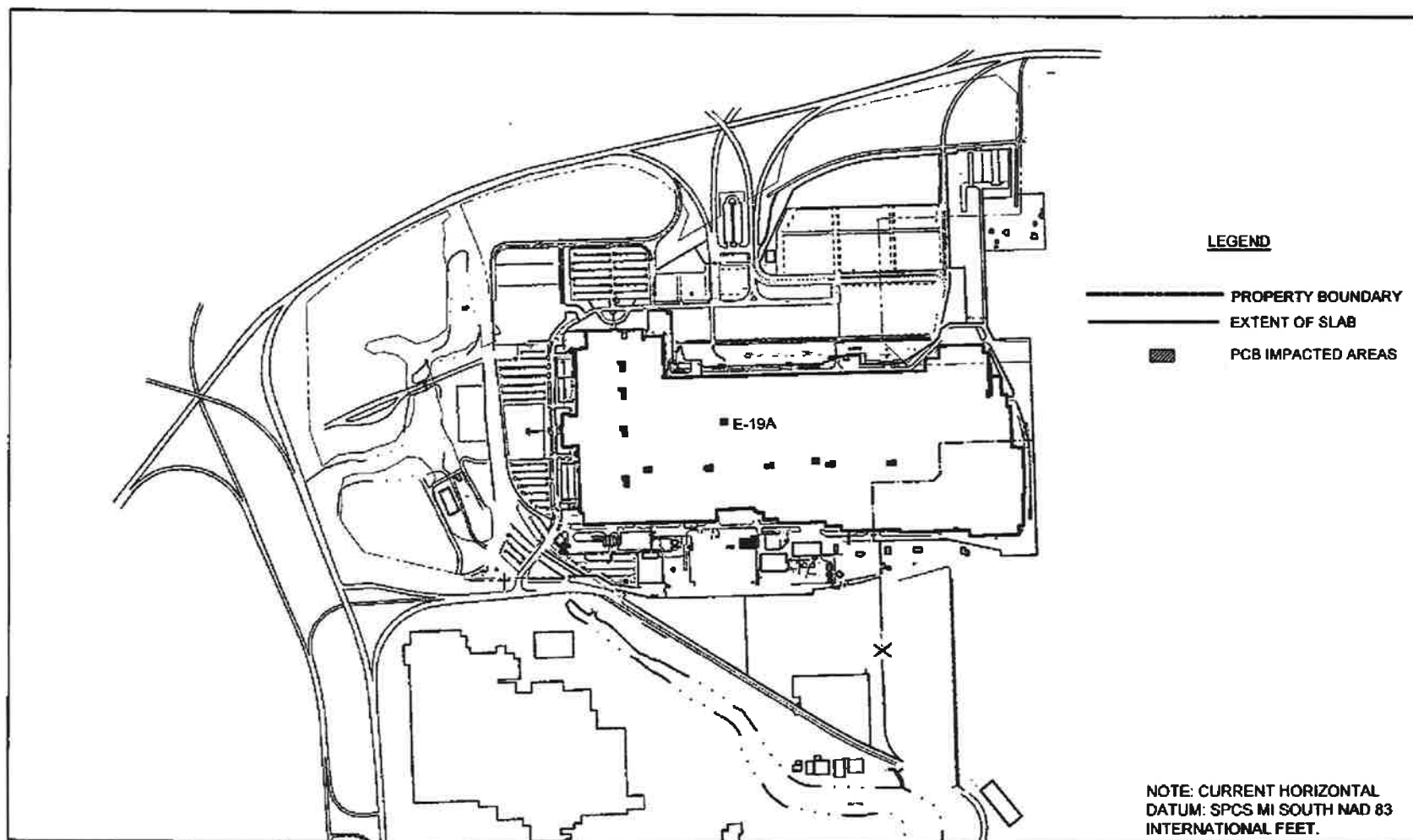
RESTRICTIVE COVENANT
LOCATION OF SUBSTATION D RESTRICTED AREA

081613-09
Oct. 31, 2016

TSCA DRC
Exhibit 6e

EXHIBIT 7

E-19A Vault



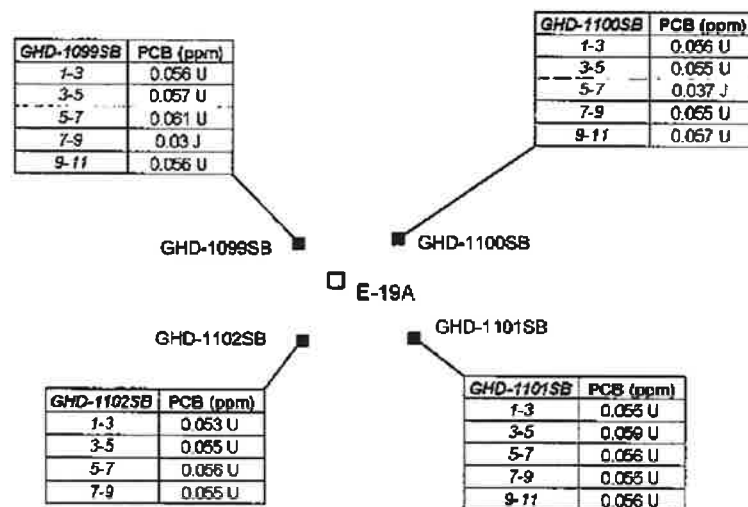
0 500 1000ft



FORMER POWERTRAIN PLANT
YPSILANTI MICHIGAN
E-19A VAULT LOCATION
PCB RESTRICTIVE COVENANT

081613-09
Oct 28, 2016

TSCA DRC
EXHIBIT 7



LEGEND

LOCATION -	GHD-1101SB	PCB (ppm)	-(mg/kg)
DEPTH -	1-3	0.055 U	- RESULTS
	3-5	0.059 U	
	5-7	0.056 U	
	7-9	0.055 U	
	9-11	0.056 U	

U - NOT DETECTED AT THE ASSOCIATED REPORTING LIMIT.
 J - ESTIMATED CONCENTRATION.
 P - THE %RPD BETWEEN THE PRIMARY AND CONFIRMATION COLUMN/DETECTOR IS >40%. THE LOWER VALUE HAS BEEN REPORTED.

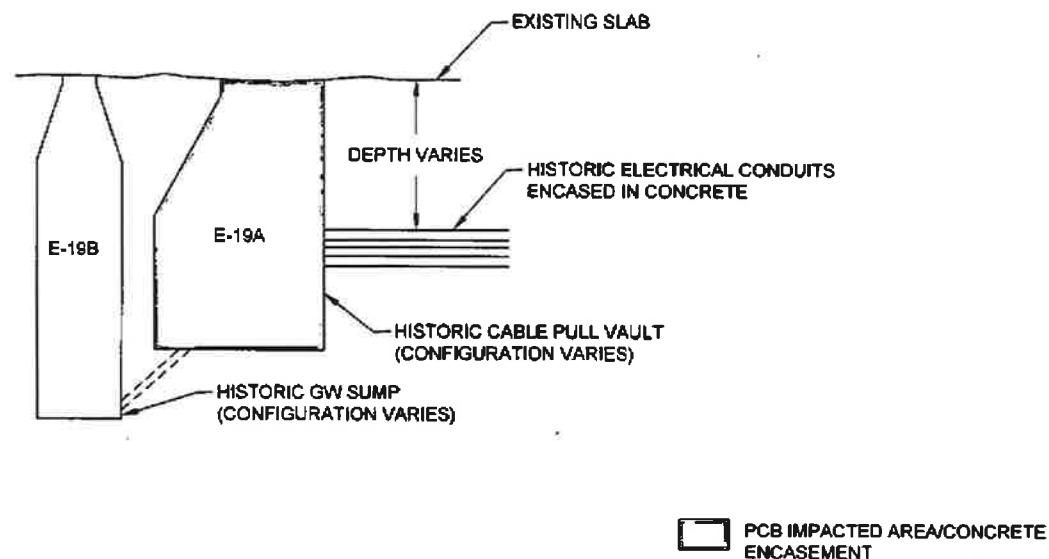
NOTE: CURRENT HORIZONTAL DATUM: SPCS MI SOUTH NAD 83 INTERNATIONAL FEET.



FORMER POWERTRAIN PLANT
 YPSILANTI MICHIGAN
E-19A VAULT SOIL DELINEATION
PCB RESTRICTIVE COVENANT

081613-09
 Oct 28, 2016

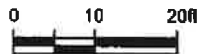
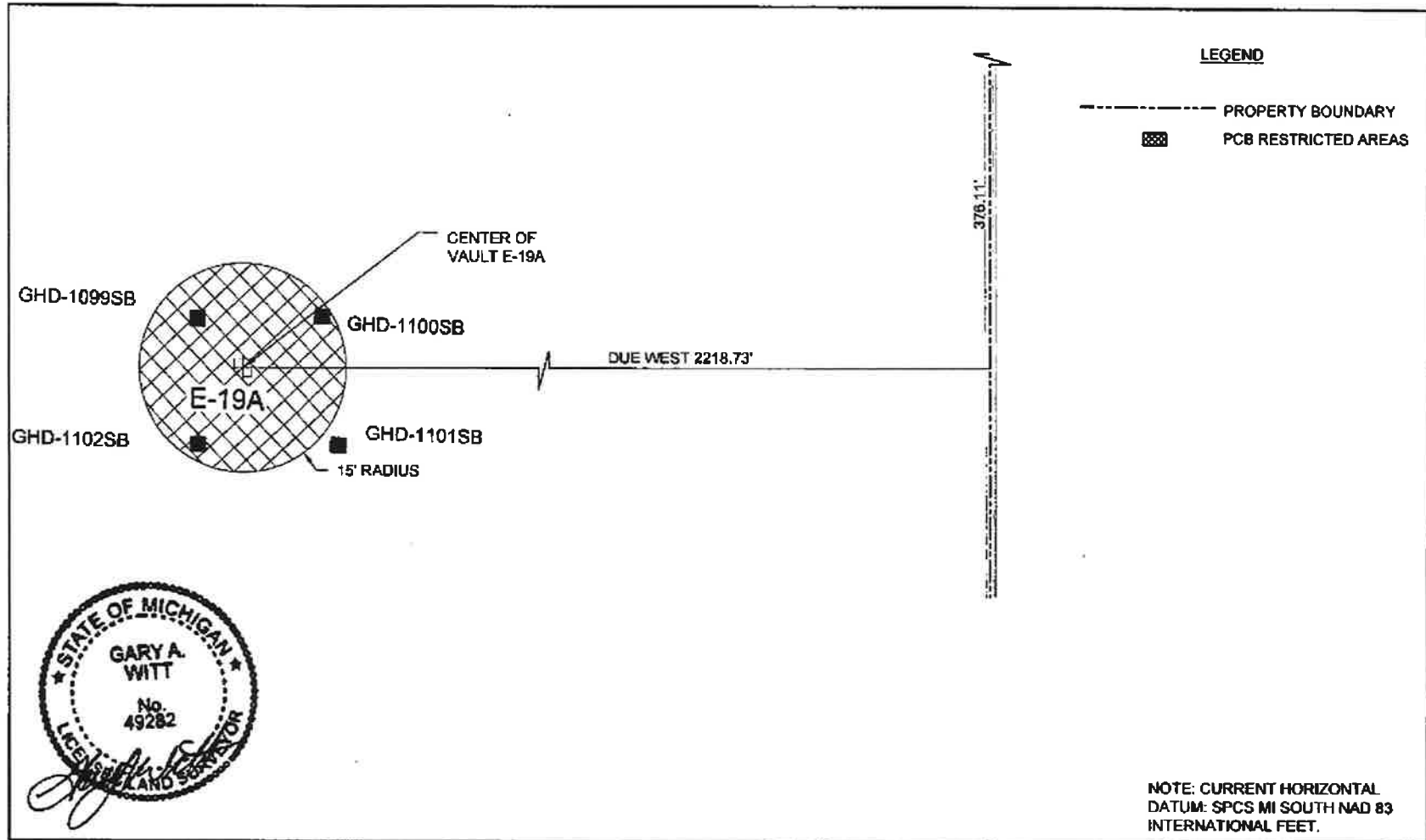
TSCA DRC
EXHIBIT 7a



FORMER POWERTRAIN PLANT
YPSILANTI MICHIGAN
E-19A VAULT CROSS SECTION
PCB RESTRICTIVE COVENANT

081613-09
Nov 2, 2016

TSCA DRC
EXHIBIT 7b



FORMER POWERTRAIN PLANT
 YPSILANTI MICHIGAN
 E-19A VAULT RESTRICTED AREA
 PCB RESTRICTIVE COVENANT

081613-09
 Nov 2, 2016

**TSCA DRC
 EXHIBIT 7d**

15 foot radius easement being centered on Vault E-19A, having a center point being described as follows:

Part of Section 7, T3S-R8E, Van Buren Township, Wayne County, Michigan and part of Sections 1 and 12, T3S-R7E, Ypsilanti Township, Washtenaw County, Michigan, more particularly described as follows: Commencing at the Northeast Corner of Section 12, T3S-R7E, Ypsilanti Township, Wayne County, Michigan, thence along the East line of Section 12, S 01°27'26" W, 33.00 feet to the Northwest Corner of Section 7, T3S-R8E, Van Buren Township, Wayne County, Michigan; thence along the North line of Section 7, N 87°37'30" E 33.07 feet; thence along a line parallel to the West line of Section 7, S 01°27'26" W, 525.40 feet; thence N 89°58'35" W, 1027.30 feet; thence S 00°01'25" W, 892.33 feet; thence S 44°58'35" E, 253.84 feet; thence S 89°58'35" E, 881.05 feet; thence Due South 376.11 feet; thence Due West 2218.73 feet to the center of a 15 foot radius easement.



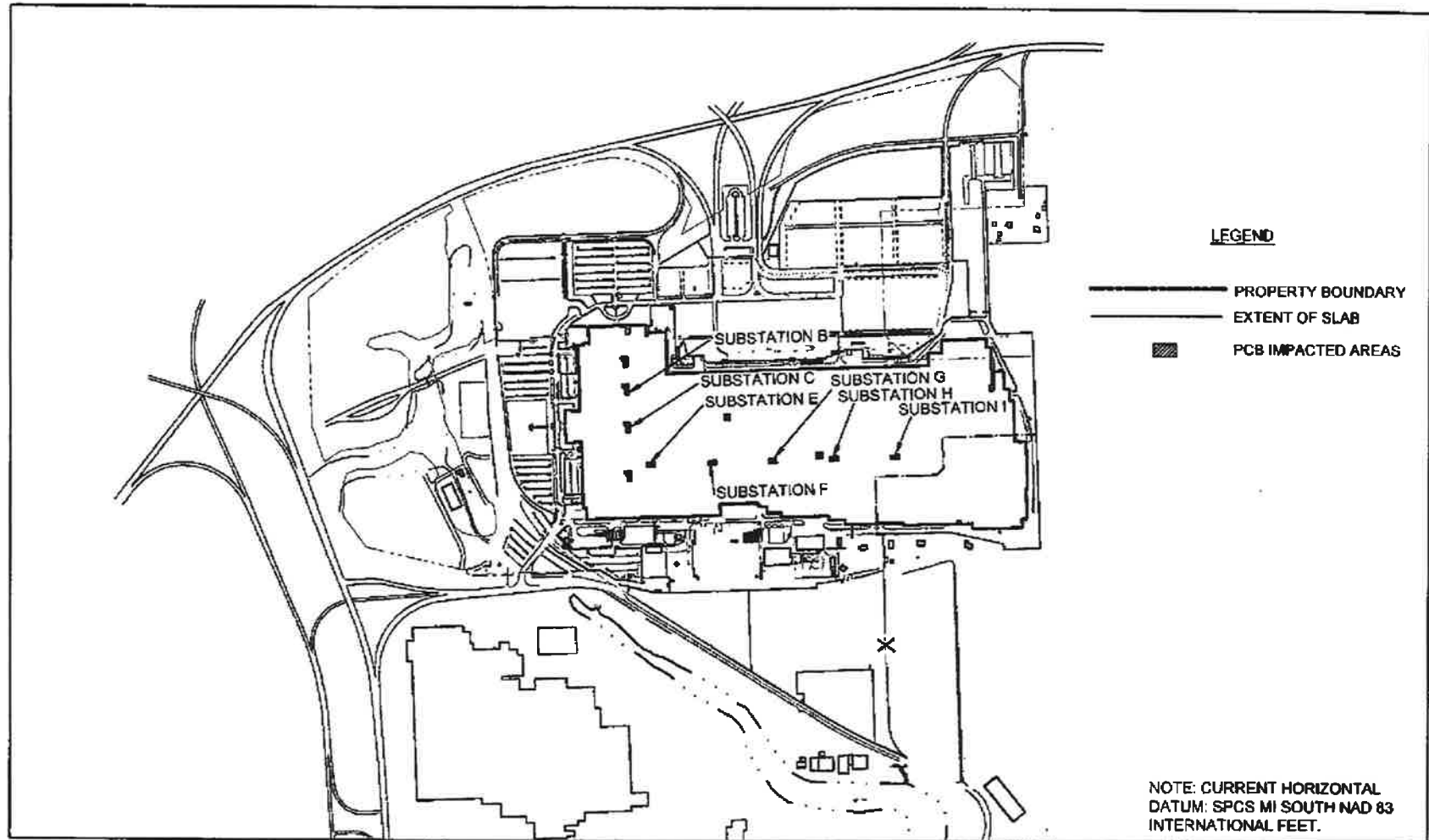
FORMER POWERTRAIN PLANT
YPSILANT, MICHIGAN

RESTRICTIVE COVENANT
LOCATION OF E-19A VAULT

081613-09
Nov. 2, 2016

TSCA DRC
Exhibit 7e

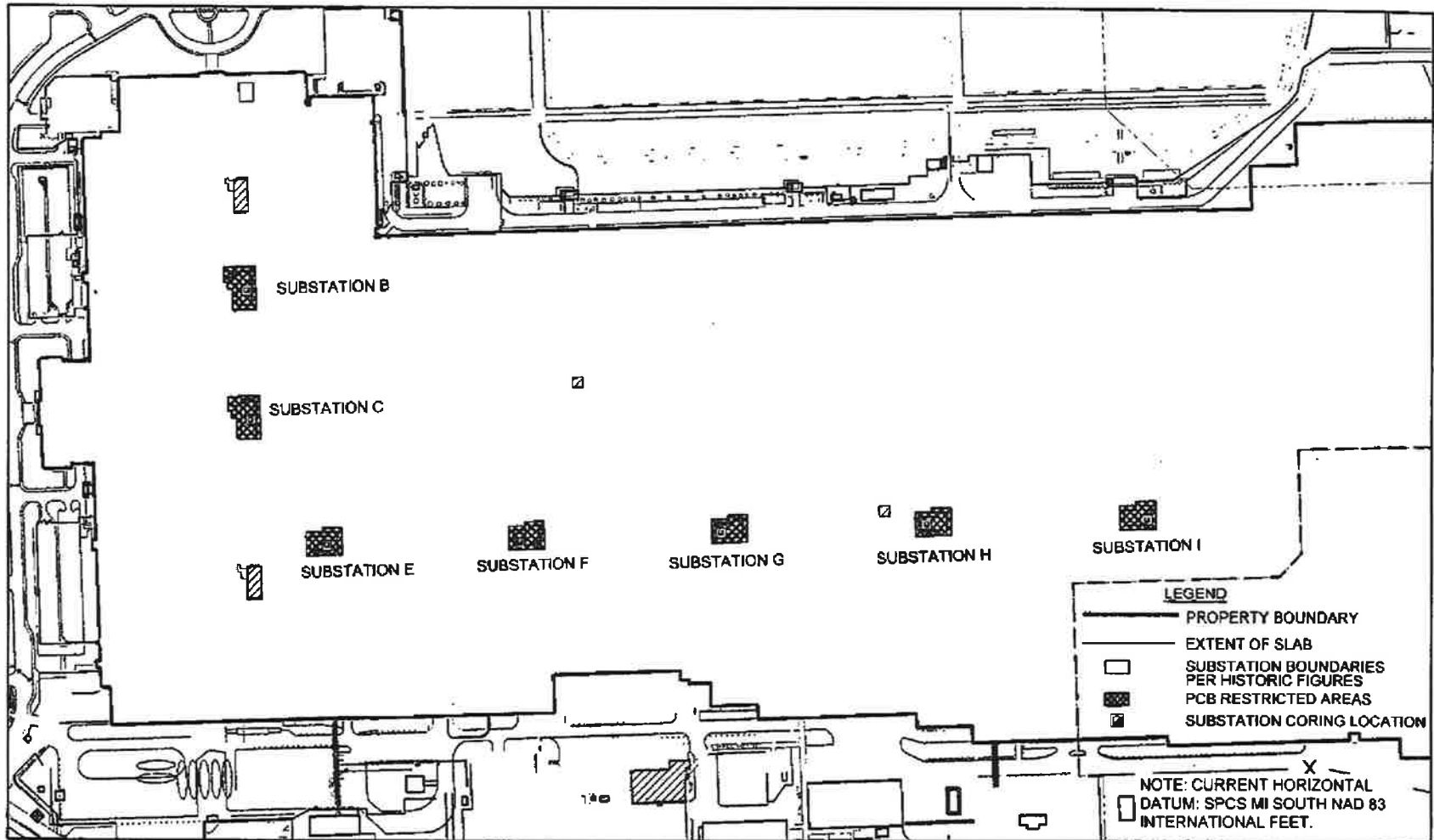
EXHIBIT 8
SUBSTATIONS B,C,E,F,G,H & I



**FORMER POWERTRAIN PLANT
YPSILANTI MICHIGAN
SUBSTATIONS B, C, E, F, G, H & I LOCATIONS
PCB RESTRICTIVE COVENANT**

081613-09
Oct 28, 2016

TSCA DRC
EXHIBIT 8



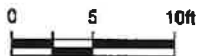
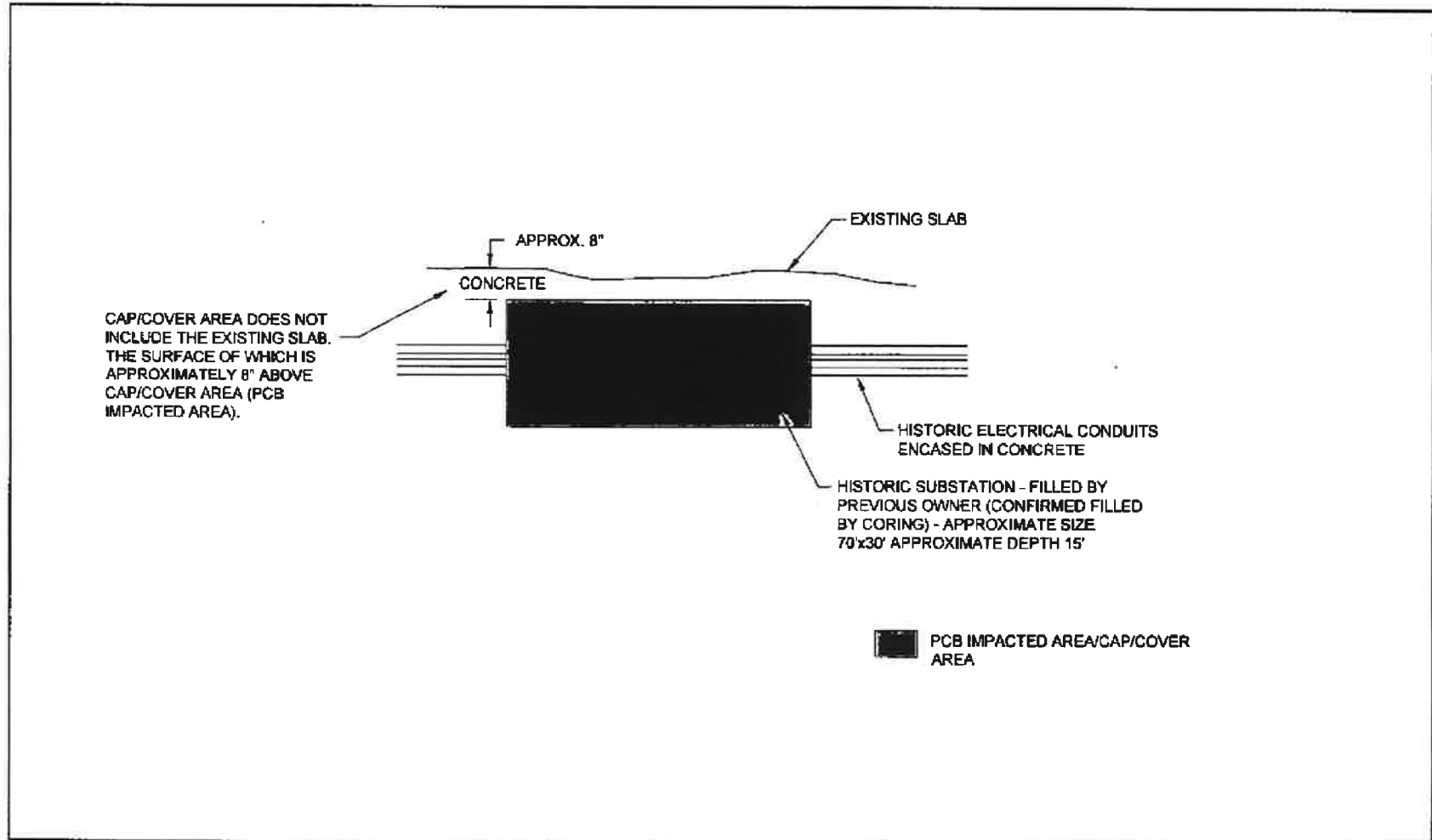
0 150 300ft



FORMER POWERTRAIN PLANT
YPSILANTI MICHIGAN
SUBSTATIONS B, C, E, F, G, H & I RESTRICTED AREAS
PCB RESTRICTIVE COVENANT

081613-09
Oct 28, 2016

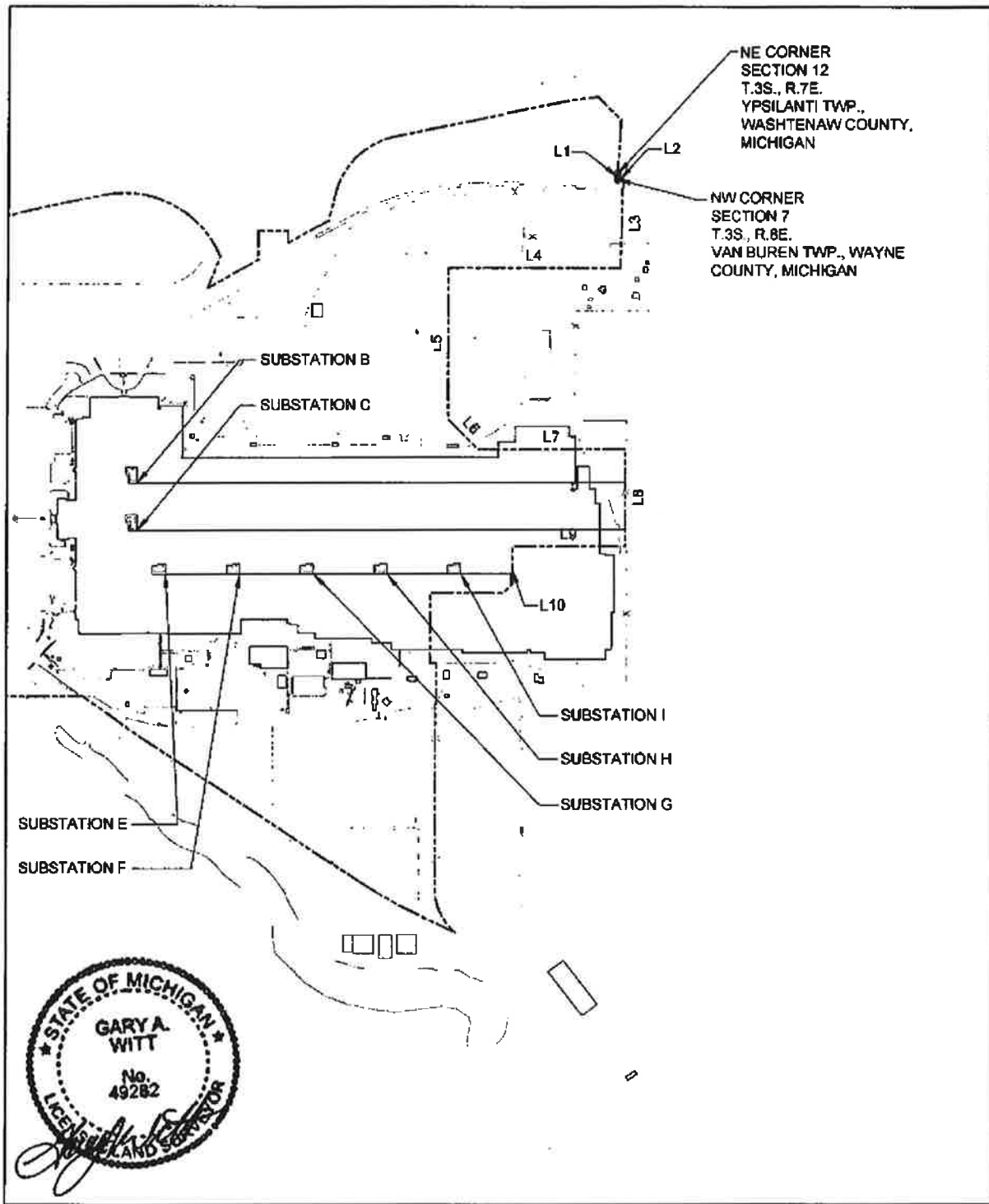
TSCA DRC
EXHIBIT 8a

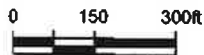
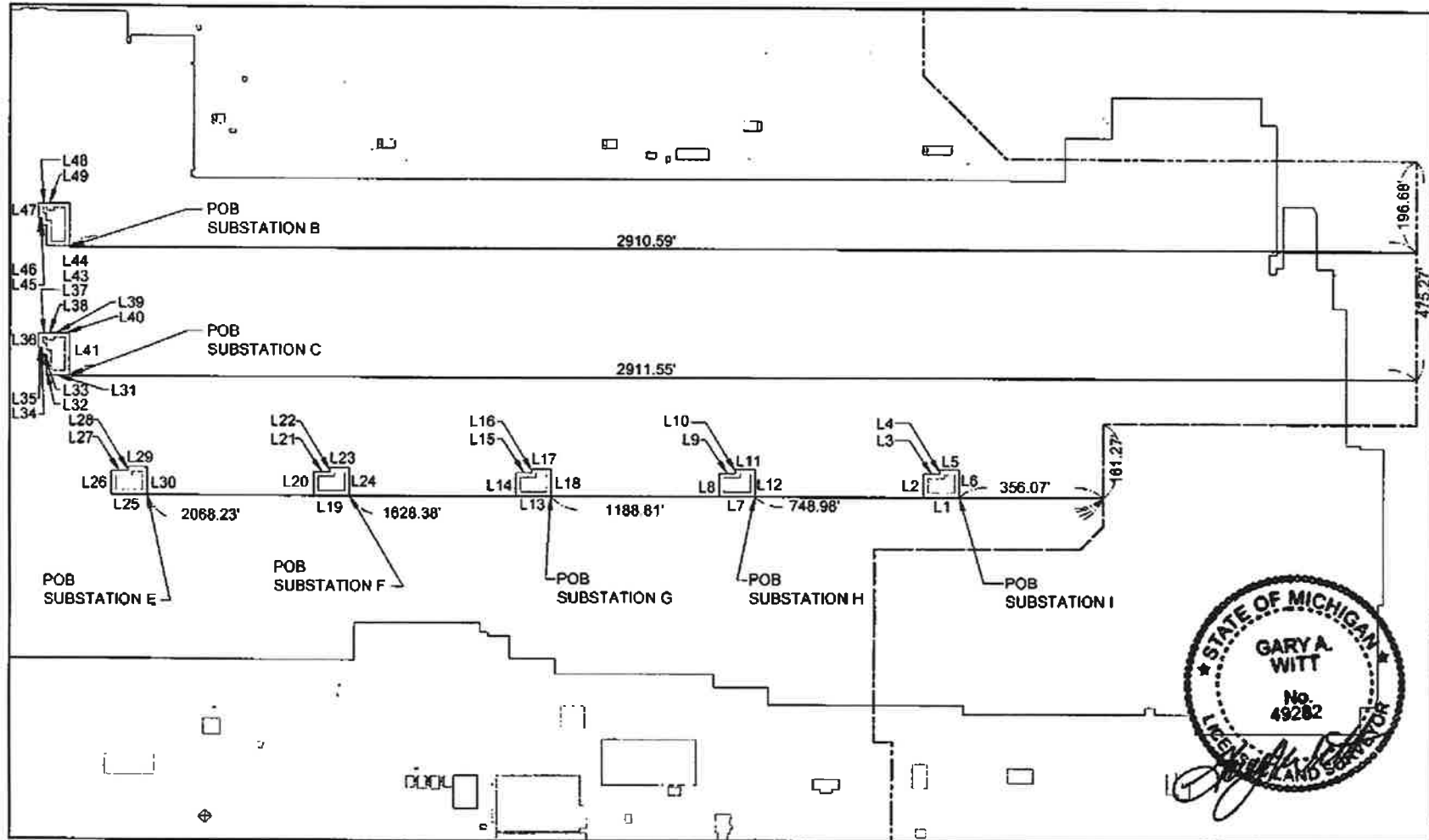


FORMER POWERTRAIN PLANT
YPSILANTI MICHIGAN
SUBSTATIONS B, C, E, F, G, H & I CROSS SECTION
PCB RESTRICTIVE COVENANT

081613-09
Nov 2, 2016

TSCA DRC
EXHIBIT 8b





FORMER POWERTRAIN PLANT
YPSILANTI, MICHIGAN

SUBSTATIONS B, C, E, F, G, H & I RESTRICTED AREAS
PCB RESTRICTIVE COVENANT

081613-09
Nov 2, 2016

TSCA DRC
EXHIBIT 8d

Line #	Direction	Length
L1	N1° 27' 26"E	33.00
L2	S87° 37' 30"W	33.07
L3	N1° 27' 26"E	525.40
L4	S89° 58' 35"E	1027.30
L5	N0° 01' 25"E	892.33
L6	N44° 68' 35"W	253.84
L7	N89° 58' 35"W	881.05
L8	S0° SOUTH	574.23
L9	S89° 58' 00"E	673.56
L10	N0° 02' 00"E	224.85

Line #	Direction	Length
L19	N89° 59' 27"W	77.48
L20	N00° 00' 33"E	51.57
L21	S89° 59' 15"E	35.49
L22	N00° 00' 45"E	8.50
L23	S89° 59' 16"E	41.99
L24	S00° 00' 33"W	60.08

Line #	Direction	Length
L1	N88° 59' 27"W	77.48
L2	N00° 00' 45"E	51.49
L3	S89° 59' 15"E	35.49
L4	N00° 00' 45"E	8.50
L5	S89° 59' 15"E	41.99
L6	S00° 00' 45"W	59.98

Line #	Direction	Length
L26	N89° 59' 16"W	77.48
L26	N00° 00' 45"E	51.49
L27	S89° 59' 15"E	35.49
L28	N00° 00' 45"E	8.50
L29	S89° 59' 15"E	41.99
L30	S00° 00' 45"W	59.96

Line #	Direction	Length
L7	N89° 58' 27"W	77.48
L8	N00° 00' 45"E	51.52
L9	S89° 59' 15"E	35.48
L10	N00° 00' 45"E	8.50
L11	S89° 59' 15"E	41.00
L12	S00° 00' 45"W	60.01

Line #	Direction	Length
L31	N89° 59' 15"W	50.24
L32	N00° 00' 45"E	45.73
L33	N89° 59' 15"W	11.00
L34	N00° 00' 45"E	15.49
L35	N89° 59' 15"W	5.74
L36	N00° 00' 45"E	31.58
L37	S89° 59' 15"E	24.15
L38	N00° 00' 45"E	0.83
L39	N89° 59' 31"E	33.05
L40	S89° 24' 27"E	10.76
L41	S00° 00' 45"W	93.54

Line #	Direction	Length
L13	N89° 59' 27"W	77.47
L14	N00° 00' 33"E	51.54
L15	S89° 59' 15"E	35.49
L16	N00° 00' 45"E	6.50
L17	S89° 59' 16"E	41.99
L18	S00° 00' 45"W	60.08

Line #	Direction	Length
L42	N88° 59' 15"W	50.24
L43	N00° 00' 45"E	46.73
L44	N88° 58' 15"W	11.00
L45	N00° 00' 45"E	15.48
L46	N89° 59' 15"W	8.74
L47	N00° 00' 45"E	31.58
L48	S89° 59' 15"E	24.15
L49	N00° 00' 45"E	0.63
L50	N88° 58' 31"E	43.82
L51	S00° 00' 45"W	93.64



**FORMER POWERTRAIN PLANT
YPSILANTI, MICHIGAN
SUBSTATIONS B, C, E, F, G,
H & I RESTRICTED AREAS
PCB RESTRICTIVE COVENANT**

081613-09
Nov 2, 2016

TSCA DRC

EXHIBIT 8e

SUBSTATION B

Part of Section 7, T3S-R8E, Van Buren Township, Wayne County, Michigan and part of Sections 1 and 12, T3S-R7E, Ypsilanti Township, Washtenaw County, Michigan, more particularly described as follows: Commencing at the Northeast Corner of Section 12, T3S-R7E, Ypsilanti Township, Wayne County, Michigan, thence along the East line of Section 12, S 01°27'26" W, 33.00 feet to the Northwest Corner of Section 7, T3S-R8E, Van Buren Township, Wayne County, Michigan; thence along the North line of Section 7, N 87°37'30" E 33.07 feet; thence along a line parallel to the West line of Section 7, S 01°27'26" W, 525.40 feet; thence N 89°58'35" W, 1027.30 feet; thence S 00°01'25" W, 892.33 feet; thence S 44°58'35" E, 253.84 feet; thence S 89°58'35" E, 881.05 feet; thence Due South, 196.68 feet; ; thence due West, 2910.59 feet, to the POINT OF BEGINNING of the parcel to be described; thence N 89°59'15" W, 50.24 feet; thence N 00°00'45" E, 45.73 feet; thence N 89°59'15" W, 11.00 feet; thence N 00°00'45" E, 15.49 feet; thence N 89°59'15" W, 6.74 feet; thence N 00°00'45" E, 31.58 feet; thence S 89°59'15" E, 24.15 feet; thence N 00°00'45" E, 0.83 feet; thence S 89°59'15" E, 43.82 feet; thence S 00°00'45" W, 93.64 feet to the POINT OF BEGINNING, containing 0.12 acres, more or less.

SUBSTATION C

Part of Section 7, T3S-R8E, Van Buren Township, Wayne County, Michigan and part of Sections 1 and 12, T3S-R7E, Ypsilanti Township, Washtenaw County, Michigan, more particularly described as follows: Commencing at the Northeast Corner of Section 12, T3S-R7E, Ypsilanti Township, Wayne County, Michigan, thence along the East line of Section 12, S 01°27'26" W, 33.00 feet to the Northwest Corner of Section 7, T3S-R8E, Van Buren Township, Wayne County, Michigan; thence along the North line of Section 7, N 87°37'30" E 33.07 feet; thence along a line parallel to the West line of Section 7, S 01°27'26" W, 525.40 feet; thence N 89°58'35" W, 1027.30 feet; thence S 00°01'25" W, 892.33 feet; thence S 44°58'35" E, 253.84 feet; thence S 89°58'35" E, 881.05 feet; thence Due South, 475.27 feet; thence S 89°58'21" W, 2910.60 feet, to the POINT OF BEGINNING of the parcel to be described; thence N 89°59'15" W, 50.24 feet; thence N 00°00'45" E, 45.73 feet; thence N 89°59'15" W, 11.00 feet; thence N 00°00'45" E, 15.49 feet; thence N 89°59'15" W, 6.74 feet; thence N 00°00'45" E, 31.58 feet; thence S 89°59'15" E, 24.15 feet; thence N 00°00'45" E, 0.83 feet; thence N 89°59'31" E, 33.06 feet; thence S 89°24'27" E, 10.76 feet; thence S 00°00'45" W, 93.54 feet to the POINT OF BEGINNING, containing 0.12 acres, more or less.

SUBSTATION E

Part of Section 7, T3S-R8E, Van Buren Township, Wayne County, Michigan and part of Sections 1 and 12, T3S-R7E, Ypsilanti Township, Washtenaw County, Michigan, more particularly described as follows: Commencing at the Northeast Corner of Section 12, T3S-R7E, Ypsilanti Township, Wayne County, Michigan, thence along the East line of Section 12, S 01°27'26" W, 33.00 feet to the Northwest Corner of Section 7, T3S-R8E, Van Buren Township, Wayne County, Michigan; thence along the North line of Section 7, N 87°37'30" E 33.07 feet; thence along a line parallel to the West line of Section 7, S 01°27'26" W, 525.40 feet; thence N 89°58'35" W, 1027.30 feet; thence S 00°01'25" W, 892.33 feet; thence S 44°58'35" E,



FORMER POWERTRAIN PLANT
YPSILANTI, MICHIGAN

RESTRICTIVE COVENANT
LOCATION OF SUBSTATIONS

081613-09
Oct. 31, 2016

TSCA DRC
Exhibit 8f

253.84 feet; thence S 89°58'35" E, 881.05 feet; thence Due South 574.23 feet; thence N 89°58'00" W, 673.56 feet; thence S 00°02'00" W, 161.27 feet; thence N 89°59'27" W, 2068.23 feet, to the POINT OF BEGINNING of the parcel to be described; thence N 89°59'15" W, 77.48 feet; thence N 00°00'45" E, 51.49 feet; thence S 89°59'15" E, 35.49 feet; thence N 00°00'45" E, 8.50 feet; thence S 89°59'15" E, 41.99 feet; thence S 00°00'45" W, 59.98 feet to the POINT OF BEGINNING, containing 0.10 acres, more or less.

SUBSTATION F

Part of Section 7, T3S-R8E, Van Buren Township, Wayne County, Michigan and part of Sections 1 and 12, T3S-R7E, Ypsilanti Township, Washtenaw County, Michigan, more particularly described as follows: Commencing at the Northeast Corner of Section 12, T3S-R7E, Ypsilanti Township, Wayne County, Michigan, thence along the East line of Section 12, S 01°27'26" W, 33.00 feet to the Northwest Corner of Section 7, T3S-R8E, Van Buren Township, Wayne County, Michigan; thence along the North line of Section 7, N 87°37'30" E 33.07 feet; thence along a line parallel to the West line of Section 7, S 01°27'26" W, 525.40 feet; thence N 89°58'35" W, 1027.30 feet; thence S 00°01'25" W, 892.33 feet; thence S 44°58'35" E, 253.84 feet; thence S 89°58'35" E, 881.05 feet; thence Due South 574.23 feet; thence N 89°58'00" W, 673.56 feet; thence S 00°02'00" W, 161.27 feet; thence N 89°59'27" W, 1628.38 feet, to the POINT OF BEGINNING of the parcel to be described; thence continuing N 89°59'27" W, 77.48 feet; thence N 00°00'33" E, 51.57 feet; thence S 89°59'15" E, 35.49 feet; thence N 00°00'45" E, 8.50 feet; thence S 89°59'15" E, 41.99 feet; thence S 00°00'33" W, 60.06 feet to the POINT OF BEGINNING, containing 0.10 acres, more or less

SUBSTATION G

Part of Section 7, T3S-R8E, Van Buren Township, Wayne County, Michigan and part of Sections 1 and 12, T3S-R7E, Ypsilanti Township, Washtenaw County, Michigan, more particularly described as follows: Commencing at the Northeast Corner of Section 12, T3S-R7E, Ypsilanti Township, Wayne County, Michigan, thence along the East line of Section 12, S 01°27'26" W, 33.00 feet to the Northwest Corner of Section 7, T3S-R8E, Van Buren Township, Wayne County, Michigan; thence along the North line of Section 7, N 87°37'30" E 33.07 feet; thence along a line parallel to the West line of Section 7, S 01°27'26" W, 525.40 feet; thence N 89°58'35" W, 1027.30 feet; thence S 00°01'25" W, 892.33 feet; thence S 44°58'35" E, 253.84 feet; thence S 89°58'35" E, 881.05 feet; thence Due South 574.23 feet; thence N 89°58'00" W, 673.56 feet; thence S 00°02'00" W, 161.27 feet; thence N 89°59'27" W, 1188.81 feet, to the POINT OF BEGINNING of the parcel to be described; thence continuing N 89°59'27" W, 77.47 feet; thence N 00°00'33" E, 51.54 feet; thence S 89°59'15" E, 35.49 feet; thence N 00°00'45" E, 8.50 feet; thence S 89°59'15" E, 41.99 feet; thence S 00°00'45" W, 60.03 feet to the POINT OF BEGINNING, containing 0.10 acres, more or less.



FORMER POWERTRAIN PLANT
YPSILANTI, MICHIGAN

RESTRICTIVE COVENANT
LOCATION OF SUBSTATIONS

081613-09
Oct. 31, 2016

TSCA DRC
Exhibit 8f

SUBSTATION H

Part of Section 7, T3S-R8E, Van Buren Township, Wayne County, Michigan and part of Sections 1 and 12, T3S-R7E, Ypsilanti Township, Washtenaw County, Michigan, more particularly described as follows: Commencing at the Northeast Corner of Section 12, T3S-R7E, Ypsilanti Township, Wayne County, Michigan, thence along the East line of Section 12, S 01°27'26" W, 33.00 feet to the Northwest Corner of Section 7, T3S-R8E, Van Buren Township, Wayne County, Michigan; thence along the North line of Section 7, N 87°37'30" E 33.07 feet; thence along a line parallel to the West line of Section 7, S 01°27'26" W, 525.40 feet; thence N 89°58'35" W, 1027.30 feet; thence S 00°01'25" W, 892.33 feet; thence S 44°58'35" E, 253.84 feet; thence S 89°58'35" E, 881.05 feet; thence Due South 574.23 feet; thence N 89°58'00" W, 673.56 feet; thence S 00°02'00" W, 161.27 feet; thence N 89°59'27" W, 748.99 feet, to the POINT OF BEGINNING of the parcel to be described; thence continuing N 89°59'27" W, 77.48 feet; thence N 00°00'45" E, 51.52 feet; thence S 89°59'15" E, 35.49 feet; thence N 00°00'45" E, 8.50 feet; thence S 89°59'15" E, 41.99 feet; thence S 00°00'45" W, 60.01 feet to the POINT OF BEGINNING, containing 0.10 acres, more or less.

SUBSTATION I

Part of Section 7, T3S-R8E, Van Buren Township, Wayne County, Michigan and part of Sections 1 and 12, T3S-R7E, Ypsilanti Township, Washtenaw County, Michigan, more particularly described as follows: Commencing at the Northeast Corner of Section 12, T3S-R7E, Ypsilanti Township, Wayne County, Michigan, thence along the East line of Section 12, S 01°27'26" W, 33.00 feet to the Northwest Corner of Section 7, T3S-R8E, Van Buren Township, Wayne County, Michigan; thence along the North line of Section 7, N 87°37'30" E 33.07 feet; thence along a line parallel to the West line of Section 7, S 01°27'26" W, 525.40 feet; thence N 89°58'35" W, 1027.30 feet; thence S 00°01'25" W, 892.33 feet; thence S 44°58'35" E, 253.84 feet; thence S 89°58'35" E, 881.05 feet; thence Due South 574.23 feet; thence N 89°58'00" W, 673.56 feet; thence S 00°02'00" W, 161.27 feet; thence N 89°59'27" W, 309.16 feet, to the POINT OF BEGINNING of the parcel to be described; thence continuing N 89°59'27" W, 77.48 feet; thence N 00°00'45" E, 51.49 feet; thence S 89°59'15" E, 35.49 feet; thence N 00°00'45" E, 8.50 feet; thence S 89°59'15" E, 41.99 feet; thence S 00°00'45" W, 59.98 feet to the POINT OF BEGINNING, containing 0.10 acres, more or less.



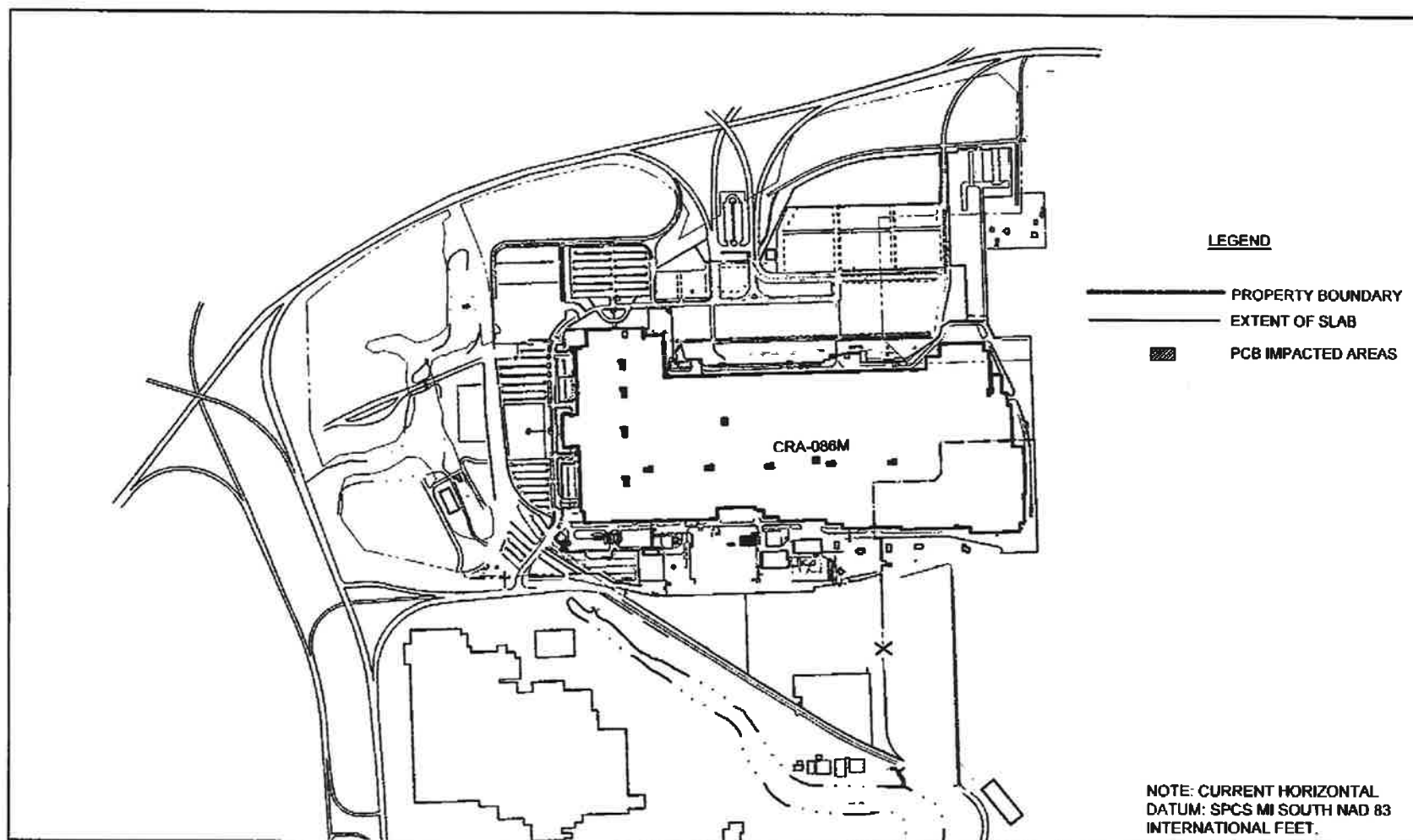
FORMER POWERTRAIN PLANT
YPSILANT, MICHIGAN

RESTRICTIVE COVENANT
LOCATION OF SUBSTATIONS

081613-09
Oct. 31, 2016

TSCA DRC
Exhibit 8f

EXHIBIT 9
Monitoring Well CRA-096M



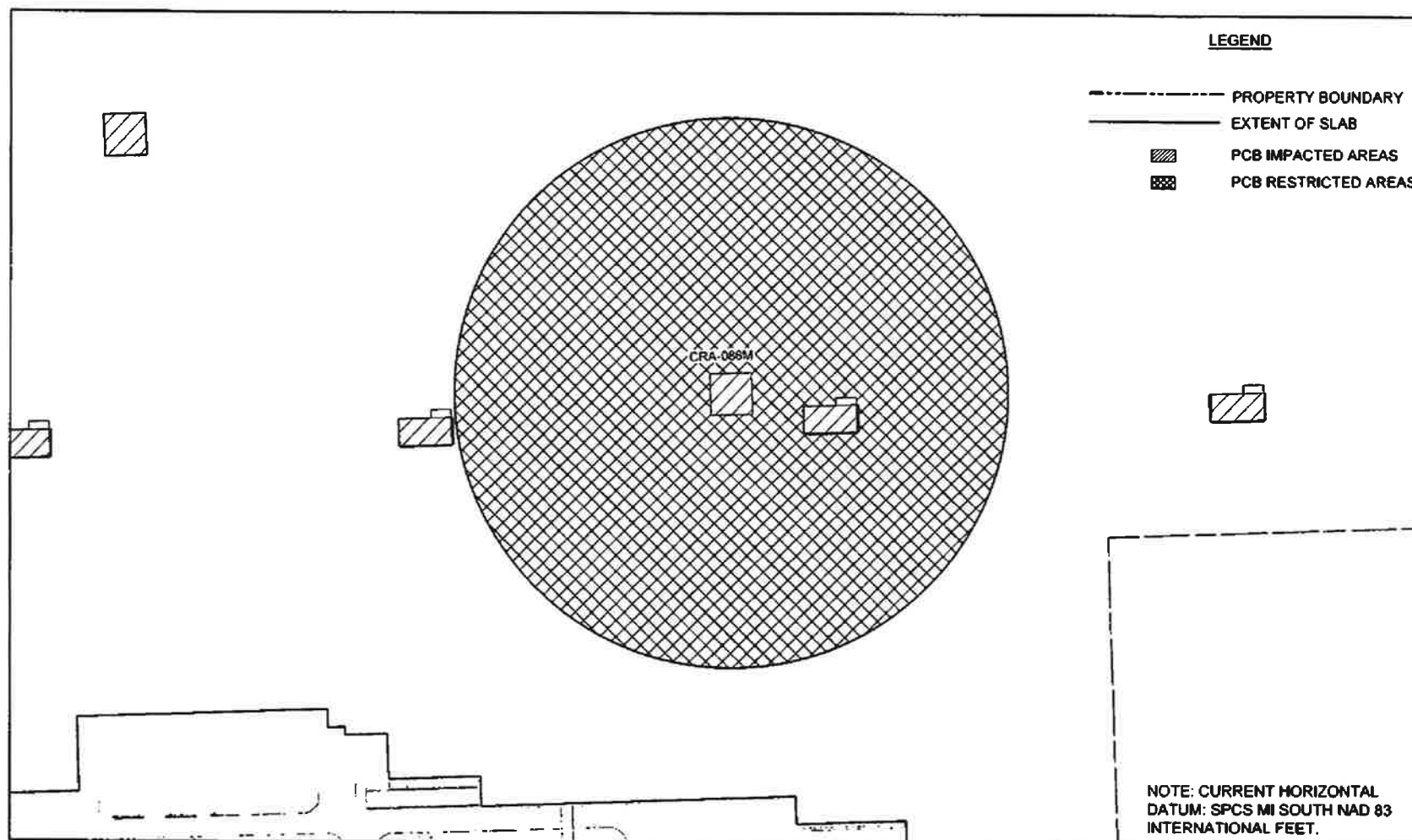
0 500 1000ft



FORMER POWERTRAIN PLANT
YPSILANTI MICHIGAN
MONITORING WELL CRA-086M LOCATION
PCB RESTRICTIVE COVENANT

081613-09
Oct 28, 2016

TSCA DRC
EXHIBIT 9



0 75 150ft



FORMER POWERTRAIN PLANT
YPSILANTI MICHIGAN
MONITORING WELL CRA-086M LOCATION
PCB RESTRICTIVE COVENANT

081613-09
Oct 28, 2016

TSCA DRC
EXHIBIT 9a

200 foot radius easement being centered on Monitoring Well CRA-086M, having a center point being described as follows:

Part of Section 7, T3S-R8E, Van Buren Township, Wayne County, Michigan and part of Sections 1 and 12, T3S-R7E, Ypsilanti Township, Washtenaw County, Michigan, more particularly described as follows: Commencing at the Northeast Corner of Section 12, T3S-R7E, Ypsilanti Township, Wayne County, Michigan, thence along the East line of Section 12, S 01°27'26" W, 33.00 feet to the Northwest Corner of Section 7, T3S-R8E, Van Buren Township, Wayne County, Michigan; thence along the North line of Section 7, N 87°37'30" E 33.07 feet; thence along a line parallel to the West line of Section 7, S 01°27'26" W, 525.40 feet; thence N 89°58'35" W, 1027.30 feet; thence S 00°01'25" W, 892.33 feet; thence S 44°58'35" E, 253.84 feet; thence S 89°58'35" E, 881.05 feet; thence due South 574.23 feet; thence N 89°58'00" W, 673.56 feet; thence S 00°02'00" W, 224.85 feet; thence S 45°02'00" W, 69.30 feet; thence N 89°58'00" W, 443.50 feet; thence S 00°02'00" W, 103.59 feet; thence Due West 894.93 feet to the center of a 200 foot radius easement.



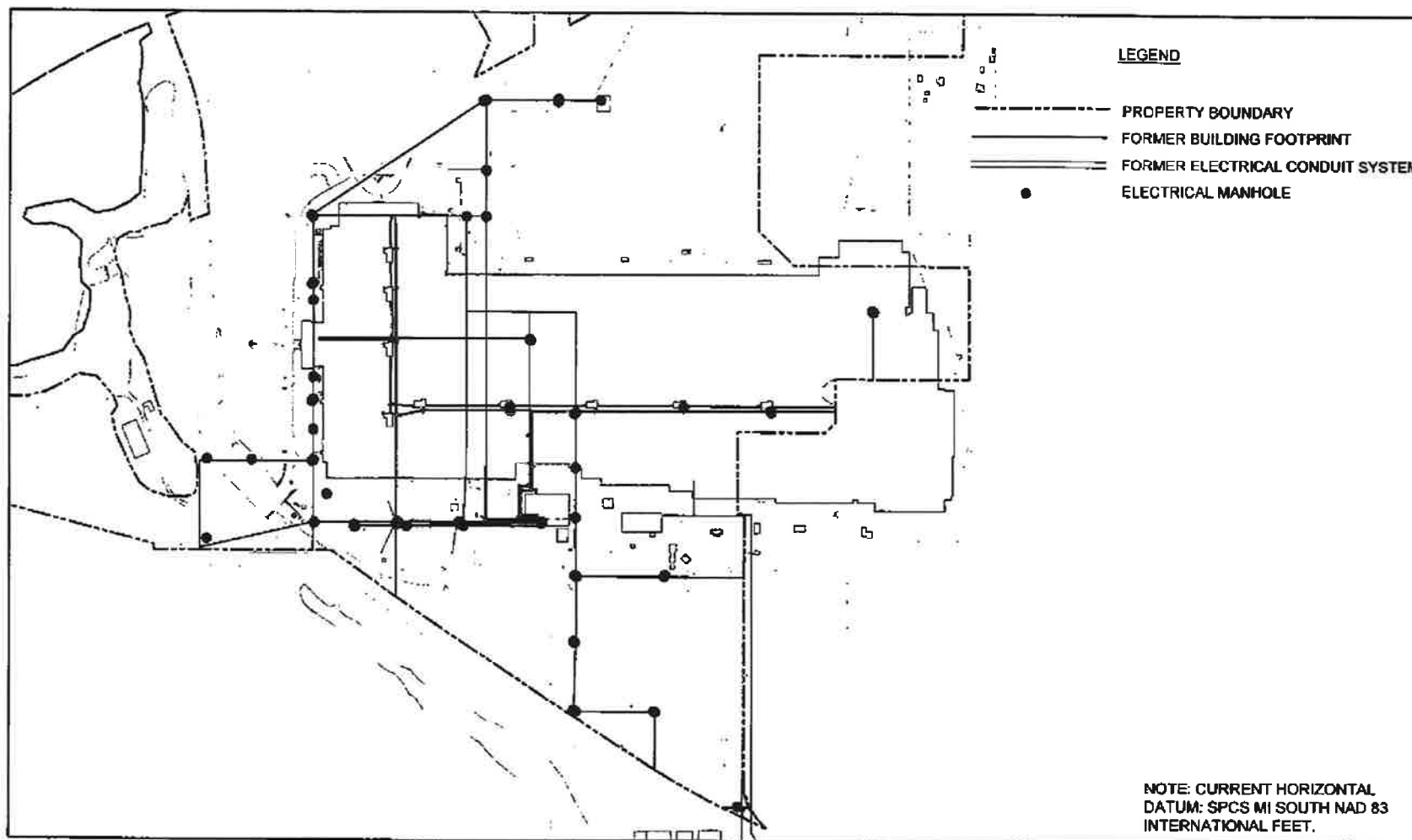
FORMER POWERTRAIN PLANT
YPSILANT, MICHIGAN

RESTRICTIVE COVENANT
LOCATION OF MONITORING WELL CRA-086M

081613-09
Nov. 2, 2016

TSCA DRC
Exhibit 9d

EXHIBIT 10
Former Electrical Duct System



0 350 700ft



FORMER POWERTRAIN PLANT
YPSILANTI, MICHIGAN
LOCATION OF FORMER ELECTRICAL DUCT SYSTEM
PCB RESTRICTIVE COVENANT

081613-09
Nov 2, 2016

TSCA DRC
EXHIBIT 10

Appendix C

PCE Soil at Former Building 19 Area Not Listed Hazardous Waste

From: Ferritto, James (DEQ) <FERRITTOJ@michigan.gov>
Sent: Wednesday, February 15, 2017 9:05 AM
To: Landale, Beth; Grant Trigger (gtrigger@racertrust.org); Bains, Amandeep
Cc: Lund, Kevin (DEQ); Slayton, David (DEQ); McCabe, John (DEQ); Bean, Lawrence (DEQ); Sonnenberg, Tim (DEQ)
Subject: PCE-contaminated soils from the former Building 19, Former Willow Run Powertrain Site, Ypsilanti, Michigan

Beth, Grant, Amandeep,

This note serves to summarize our telephone discussion on February 2, 2017 regarding the characterization of PCE-impacted soils at the former "Building 19" site at the former Willow Run Powertrain facility in Ypsilanti. In addition, this note memorializes how DEQ came to the conclusion that the PCE-impacted soils at the Building 19 location would not be considered F-listed waste when being disposed.

Information was provided to DEQ from GHD in their memo dated February 1, 2017 and discussed during our phone call that allows DEQ to concur that the presence of PCE in the subsurface soils would not automatically be considered an F listed waste when being disposed. Just the same, the soils would still need to be evaluated for PCE (and possibly other analytes') toxicity using TCLP methods. This memo does not convey any opinion as to the toxicity of the contaminants within the soil samples collected, or those proposed for collection at the site.

As we discussed, initially, I cited several reasons why the soils excavated and generated in the immediate vicinity of Building 19 could *likely* be considered a listed waste. This was based on several assumed factors based on limited information. Historical records are few at this time but suggest the site had two underground PCE storage tanks, and, had laundering/scouring capabilities within the building. I had naturally assumed the PCE was used as part of the laundering facilities, but we have no concrete evidence of the manner in which it was specifically used and thus whether it was spent or virgin product before being released into the environment. In addition, because environmentally sound and safe handling practices of PCE hadn't evolved to the standards that they are today, it would be unlikely that all of the spent PCE would be captured after use such that some could not have been somehow spilled or released into the environment. Hence, my initial conclusion that excavated soils from the vicinity of Building 19 should be managed as F-listed waste. It should be noted here that the soils could still be considered characteristically hazardous for PCE (and/or other contaminants). A toxicity evaluation of the contaminated soils is not covered here but should be completed before disposal begins.

In their aforementioned memo, GHD articulates their position as to why the soils should not automatically be considered *listed* hazardous waste when being disposed. In summary, they cite several reasons, which, after further consideration, I believe are valid and pertinent to their argument. Some of the key elements of the GHD memo are summarized below:

1. "RACER has made a good faith effort to determine the source" – DEQ concurs that GHD and RACER have made a good faith effort to research the history of operations at the former Building 19 site and source of PCE in the underlying soils. DEQ also understands that the available information regarding the presence of the two PCE USTs,

and the use of on-site glove washer/scouring equipment, was only listed on a historical air permit inspection form that contained limited information. The DEQ has not received other records discussing the use of PCE at the site as they appear to be unavailable. Essentially, DEQ can only assume, but cannot confirm, the PCE identified in the soils at the Building 19 site was used specifically for its solvent properties. There is no concrete information supporting this position.

2. A determination as to how the PCE ended up in the soils, and the nature of its use before being released, cannot be verified and therefore cannot be attached to a listed waste code. There is apparently no evidence that the PCE was either spent or unused, and therefore, we cannot assign either an "F" or "P" listing to the soils when they are exhumed. Additionally, we cannot assure the solvent contained a total of 10% or more of PCE, which is another means to evaluate whether the waste meets the definition in Table 203a of Rule 299.9220 of Part 111.
3. The waste soils could still be considered characteristically hazardous if they fail the TCLP testing for PCE or possibly any other analytes including metals or other VOCs. DEQ is of the opinion that once the soils are excavated and therefore "generated", that act begins the point when they would be considered a waste, per se, and thus require proper management.
4. The attachments and other information provided in the GHD memo were helpful to staff in making our decision on the disposition of these soils.

In general, DEQ agrees with the premise of GHD's memo and its appendices/attachments. However, please note that if additional information, data, or facts come to light that could otherwise change DEQ's position as to the characterization of the subject soils, DEQ reserves the right to make that determination. It should also be noted that this concurrence with GHD applies only to the PCE-impacted soils at the former Building 19 location on the Willow Run Powertrain facility. Any other impacted media from this or other locations will need to be evaluated and characterized separately from the subject contaminated soils.

Please feel free to contact me at the number below if anyone has any questions.

Jim

Jim Ferritto
Michigan Department of Environmental Quality
Waste Management and Radiological Protection Division
Hazardous Waste Section
120 W. Chapin Street
Cadillac, Michigan 49601

Phn 231-876-4454
Fax 231-775-1511
ferrittoj@michigan.gov

This e-mail has been scanned for viruses

Appendix D

Use of Qualifying Excavated Materials As Fill At The Covered Area

USE OF QUALIFYING EXCAVATED MATERIAL AS FILL AT THE COVERED AREA

Material excavated at many locations at the site is often already well characterized, understood to be similar to soil already addressed by controls established at the Site, and can serve a useful purpose by being relocated within the Site where additional material (fill) is needed to support new uses of the property. Maintaining and as necessary re-establishing the approved controls (pursuant to MDEQ and RACER approval) is necessary. Uses of certain excavated material as fill at the Site may not be desired or allowed for a variety of reasons (e.g., material is a regulated hazardous waste, particularly “conservative” management is desired for material of certain characteristics, geotechnical characteristics of the material, etc.). This appendix provides guidance as to materials that may be used as fill at the Covered Area of the site (Qualifying Material – “QM”) relative to the presence or absence of potentially polluting substances.

Description of Covered Area

The Covered Area (CA) of the Site is that established by the Declarations of Restrictive Covenant (DRC) which describe all property to which the DRC applies and specifically in Exhibit 5 (RCRA DRC). The CA constitutes a “facility” pursuant to Part 201 of NREPA due to the presence of substances in soil and groundwater at concentrations exceeding generic residential cleanup criteria. Potential hazards posed by the substances are mitigated by a combination of: land use controls (prohibition of residential uses and extraction of groundwater for uses other than to support remedial actions); the presence of cover material that limits direct contact, infiltration of precipitation, and prevents airborne particulate exposures; stormwater collection systems; and a groundwater collection and treatment system to address potential off-Site migration of impacted groundwater.

Qualifications for Excavated Material Use as Fill at Covered Area of Site

Excavated material may be placed within the CA based on any of the following three qualifications and general conditions:

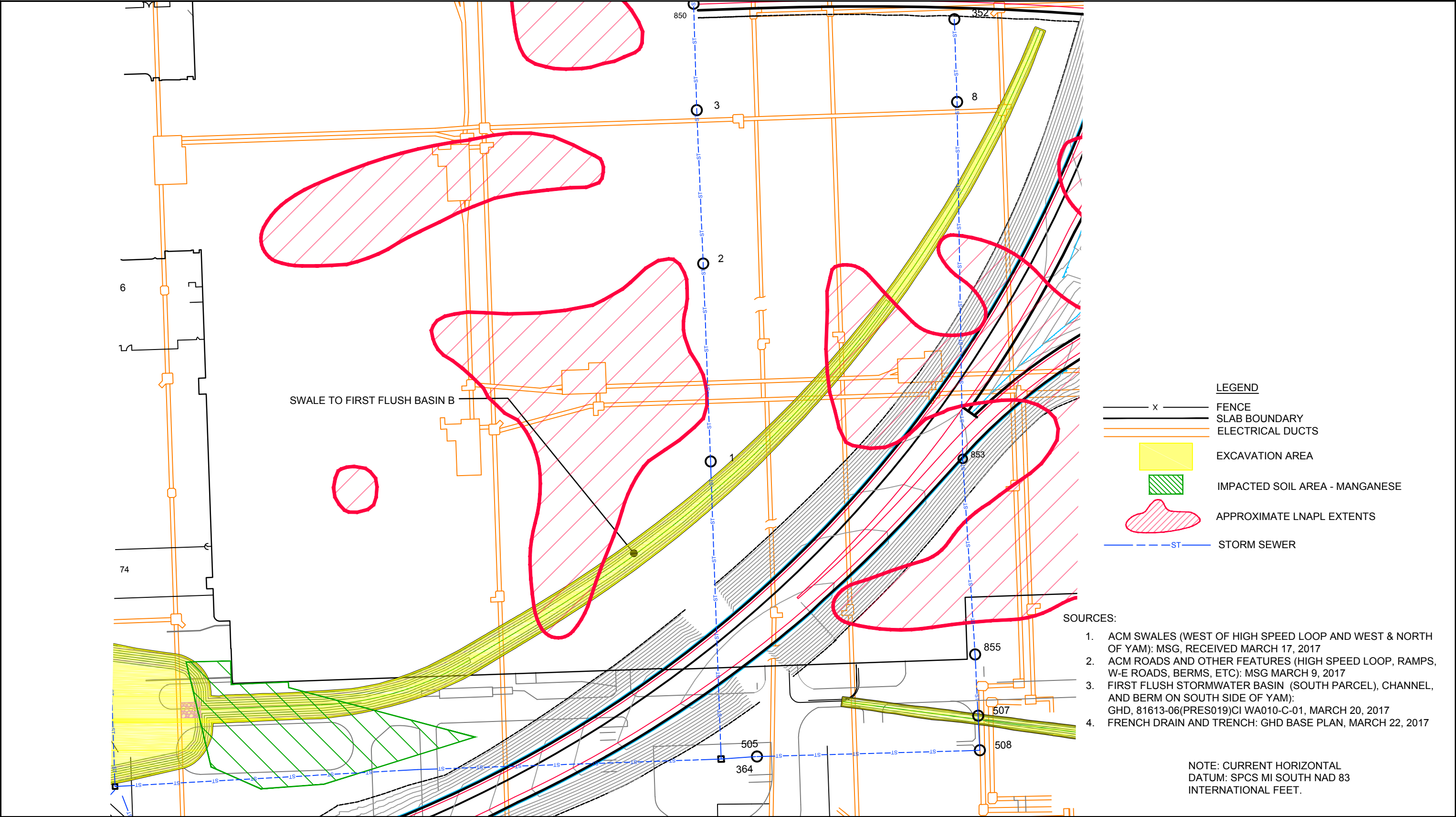
1. Excavated material is not solid waste as it is pavement that is excluded from the definition of solid waste and used for construction or it is soil that is not impacted by

substances at concentrations exceeding generic residential cleanup criteria. Such material (soil and pavement) is not subject to obligations for cover or other actions to address potential exposures to substances within the material. Soil erosion and nuisance dust control may be necessary, and obligations of the Deed Restriction relative to not interfering with the function of various aspects of the CA such as the cover, monitoring structures, etc. must be met (unless specifically approved by MDEQ and RACER)

2. Excavated material originates from within the CA and is not hazardous waste nor does it contain light non-aqueous phase liquids (LNAPL), and is used for construction fill with clean cover re-established per approvals from MDEQ and RACER. Such soil is relocated pursuant to the provisions of Section 20120c of NREPA rather than addressed as solid waste subject to the provisions of Part 115 of NREPA. Pavement from the building slab and concrete apron areas is not necessarily impacted and required to be covered but managing in this manner is a conservative (protective) approach.
3. Material originates from the Site but outside of the CA and is not hazardous waste nor does it contain LNAPL and is used for construction fill with cover re-established. Such soil is managed in a conservative manner and in compliance with NREPA Section 20120c based upon the fact that it is part of the property which is a facility per Part 201 and although not suspected to be impacted, may not have been investigated in detail. Soil management in this manner (i.e., subject to controls established for the CA) ensures mitigation of the potential hazards that might be posed by other soils at the Site should substances exceeding relevant criteria be present. Pavement from the area is not necessarily impacted and required to be covered and could also be managed as per item 1 above.

Appendix E

Excavation Area 2 - Swale to FFB-B



WORKSHEET FOR REVIEW OF TARGETED EXCAVATION AREA

Area (name/project): **Swale to FFB-B**

Location: From SW Corner To Center of Slab (see fig 10 and fig E-1)

Details of Anticipated Excavation

Excavation into: pavement and shallow soil

Approximate volume to be removed from location = 975 cu yd pavement & 3,400 cu yd soil

Nature of Targeted Excavation Area

Subject to RCRA Deed Restriction? Yes. Electrical Vault E-19A is TSCA deed restricted

- (b) – disturbance of slab,
- (c) – disturbance of storm sewer network (dependent on depth)
- (g) - disturbance of electrical duct network (potentially)

Subject to TSCA Deed Restriction? Yes- North end of swale extends over/through Electrical Vault E-19A

Area Known to be Impacted By: LNAPL- Yes; PCE- No; As- No; Mn- Yes

Pavement in contact with LNAPL/PCE/As-Mn? Potentially LNAPL & Mn

Pavement “materially contaminated” (e.g., lead based paint)? Not expected

Pavement a public right-of-way? No

Data on Substances in Soil?: Yes, 48 soil samples collected from this area. Sample collection dates range from 1989-2016.

Excavated material “hazardous waste”? Not expected

Substances in soil exceeding Generic Residential Criteria (substances & criteria):

- Aluminum: Drinking water protection
- Antimony: Site background levels
- Arsenic: Drinking water protection, GSI
- Barium: Site background levels
- Beryllium: Site background levels
- Cadmium: Site background levels
- Chromium: Site background levels
- Cobalt: Drinking water protection, GSI
- Copper: Site background levels

- Iron: Site background levels, drinking water protection
- Lead: Site background levels
- Manganese: Site background levels, drinking water protection, GSI,
- Nickel: Site background levels
- Selenium: GSI
- Thallium: Site background levels
- Vanadium: Site background levels
- Zinc: Site background levels
- 3&4-Methylphenol: GSI
- Benzo(a)anthracene: Direct contact
- Benzo(a)pyrene: Direct contact
- Benzo(b)fluoranthene: Direct contact
- Fluoranthene: Drinking water protection, GSI
- Fluorene: GSI
- Phenanthrene: GSI
- Pyrene: Drinking water protection, GSI

Substances in soil exceeding Generic Non-residential Criteria (substances & criteria):

- Aluminum: NR drinking water protection
- Arsenic: NR drinking water protection
- Cobalt: NR drinking water protection
- Iron: NR drinking water protection
- Manganese: NR drinking water protection, NR particulate soil inhalation
- Fluoranthene: NR drinking water protection
- Pyrene: NR drinking water protection

Draft Findings as to Excavation & Material Management

1. Requires approval of MDEQ and RACER
2. Standard dust and soil erosion/sediment controls must be provided as appropriate
3. Excavation to proceed in manner that prevents (and demonstrates) fugitive dust is not generated and transported beyond excavation area, temporary staging areas and final placement area. (i.e., adequate observation & monitoring of conditions, controls such as wetting and cover, etc.)
4. Storm sewer is not to be disturbed, unless done pursuant to specifically approved action plan
5. Electrical duct network to not be disturbed without RACER and MDEQ approval. TSCA deed restricted area (Electrical Vault E-19A) requires replacement of any excavated concrete i.e. concrete cover must be re-installed
6. Impermeable cover to be re-established on excavated area

7. Excavated soil unless impacted by LNAPL may be placed within Covered Area of property provided clean cover material is established. Several sections of the swale to FFB-B will go through known areas of LNAPL. Most starting depths of LNAPL in these areas are 7-8 feet below ground surface. There are two areas where LNAPL is present at a depth of 0.2-1 ft below ground surface, however, these areas are not directly in the path of the swale.
8. Excavated pavement may be re-used for construction (unless found impacted by LNAPL)

Guidance For Excavators

Swale to FFB-B

SOIL &/OR PAVEMENT SHOULD NOT BE RETURNED TO THE EXCAVATION AND SHALL BE STAGED IN DESIGNATED AREAS FOR FURTHER EVALUATION IN ANY OF THE FOLLOWING CASES:

- Material contains oily substances
- Material is noticeably different in appearance (unusually dark stains & or sudden odor) from adjacent excavated material

IF SOIL &/OR PAVEMENT DO NOT DISPLAY THE ABOVE CHARACTERISTICS, IT CAN BE:

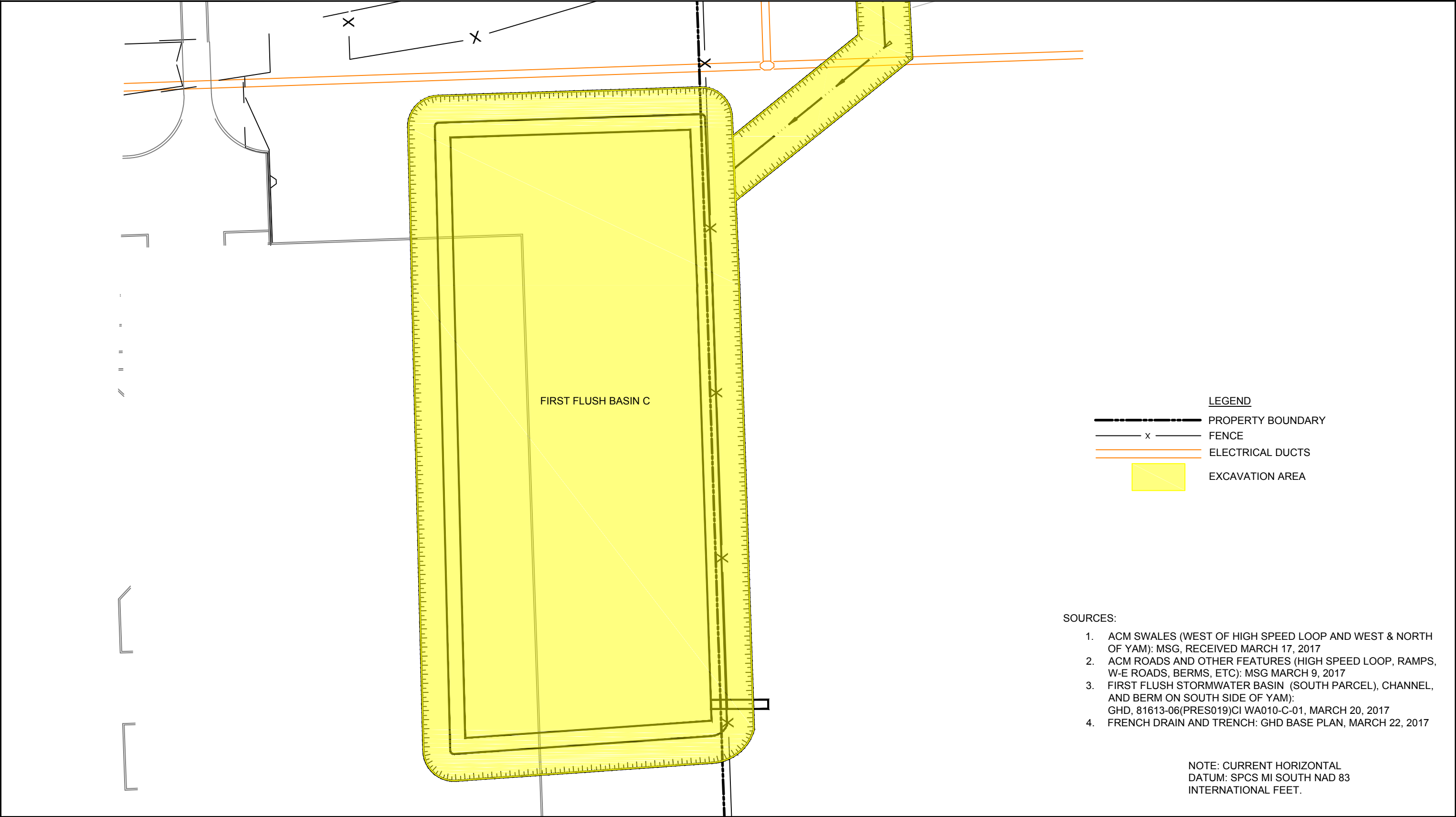
- Re-used in excavation
- Staged in designated areas for reuse elsewhere on site.

SPECIAL CONSIDERATIONS:

- Historic electrical ductwork – concrete not to be crushed and re-used. Shall be disposed offsite at an appropriately licensed facility. (Per Figure Fig E-1; - 5-6 electrical duct crossings). TSCA deed restricted area (Electrical Vault E-19A) requires replacement of any excavated concrete i.e. concrete cover must be re-installed
- LNAPL (oily soils) expected to be encountered in several sections of the swale to FFB-B. Most starting depths in these areas are 7-8 ft below ground surface
- Manganese Impacted soils expected to be encountered at the southern tip of the swale to FFB-B. Generation and transport of fugitive dust during excavation and staging of such soils is to be prevented. Impermeable cover to be re-established on excavated area

Appendix F

Excavation Area 3 - First Flush Basin C



WORKSHEET FOR REVIEW OF TARGETED EXCAVATION AREA

Area (name/project): **First Flush Basin C (FFB-C)**

Location: South of Former Large Storage Tank Area (see fig 10 and fig F-1)

Details of Anticipated Excavation

Excavation into: both pavement and soil

Approximate volume to be removed from location = 4,700 cu yd pavement; 22,100 cu yd soil

Nature of Targeted Excavation Area

Subject to RCRA Deed Restriction? Yes

- (b) – disturbance of slab, concrete apron, parking lot, etc.

Subject to TSCA Deed Restriction? No

Known to be Impacted By: LNAPL- No; PCE- No; As- No; Mn- No

Pavement in contact with LNAPL/PCE/As-Mn? No

Pavement “materially contaminated” (e.g., lead based paint)? Not expected

Pavement a public right-of-way? No

Data on Substances in Soil?: Yes, 4 soil samples collected from this area. Sample collection dates were from 2013.

Excavated material “hazardous waste”? Not expected

Substances in soil exceeding Generic Residential Criteria (substances & criteria):

- Aluminum: Drinking water protection
- Cobalt: Drinking water protection, GSI
- Manganese: Drinking water protection, GSI

Substances in soil exceeding Generic Non-residential Criteria (substances & criteria):

- Aluminum: NR drinking water protection
- Cobalt: NR drinking water protection
- Manganese: NR drinking water protection

Draft Findings as to Excavation & Material Management

1. Requires approval of MDEQ and RACER
2. Standard dust and soil erosion/sedimentation controls must be provided as appropriate
3. Impermeable cover to be re-established on excavated area
4. Excavated pavement may be reused for construction
5. Excavated soil may be placed within Covered Area of property provided clean impermeable cover material is re-established
6. No LNAPL data points in the area of FFB-C. LNAPL not expected to be encountered

Guidance For Excavators

FFB-C

SOIL &/OR PAVEMENT SHOULD NOT BE RETURNED TO THE EXCAVATION AND SHALL BE STAGED IN DESIGNATED AREAS FOR FURTHER EVALUATION IN ANY OF THE FOLLOWING CASES:

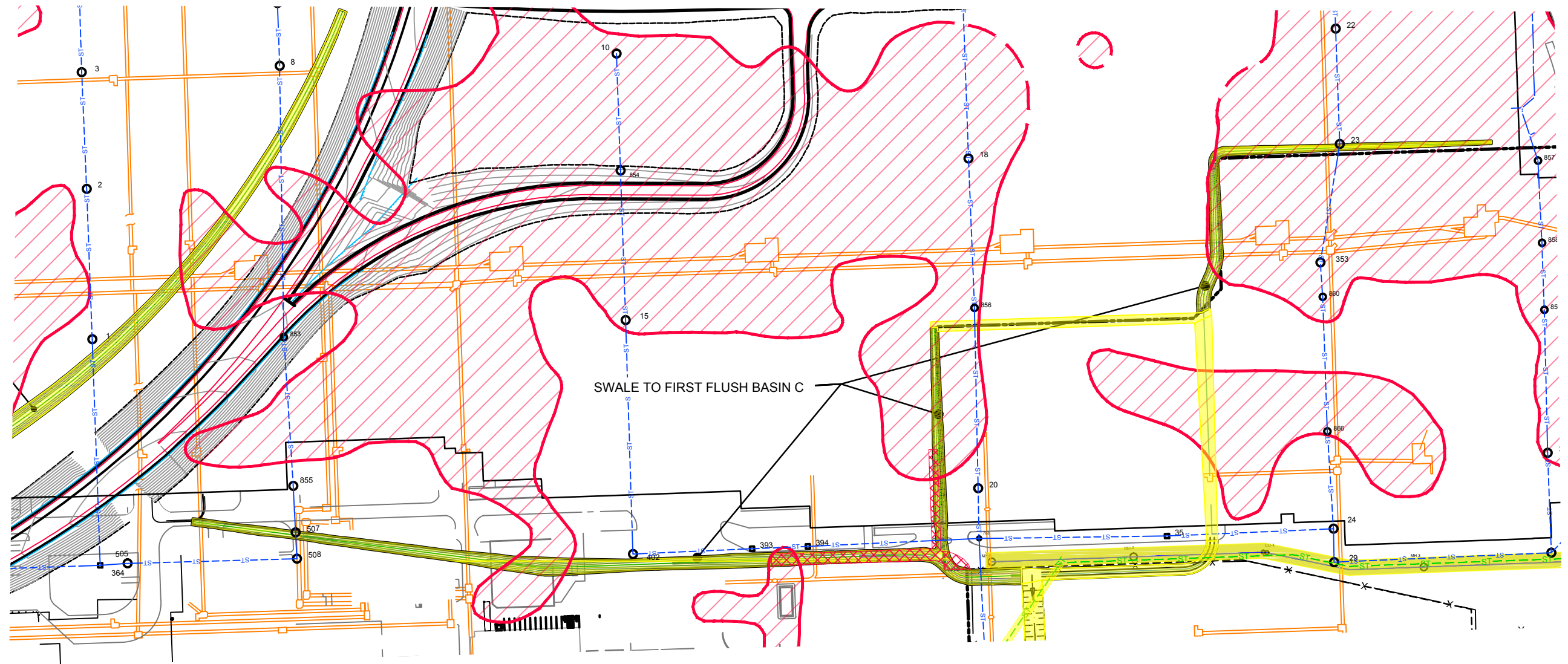
- *Material contains oily substances*
- *Material is noticeably different in appearance (unusually dark stains & or sudden odor) from adjacent excavated material*

IF SOIL &/OR PAVEMENT DO NOT DISPLAY THE ABOVE CHARACTERISTICS, IT CAN BE:

- *Re-used in excavation*
- *Staged in designated areas for reuse elsewhere on site.*

Appendix G

Excavation Area 4 - Swale to FFB-C



LEGEND

	PROPERTY BOUNDARY
	FENCE
	SLAB BOUNDARY
	WATER
	ELECTRICAL DUCTS
	EXCAVATION AREA
	PCE IMPACTED AREA
	APPROXIMATE LNAPL EXTENTS
	STORM SEWER

SOURCES:

1. ACM SWALES (WEST OF HIGH SPEED LOOP AND WEST & NORTH OF YAM): MSG, RECEIVED MARCH 17, 2017
2. ACM ROADS AND OTHER FEATURES (HIGH SPEED LOOP, RAMPS, W-E ROADS, BERMS, ETC): MSG MARCH 9, 2017
3. FIRST FLUSH STORMWATER BASIN (SOUTH PARCEL), CHANNEL, AND BERM ON SOUTH SIDE OF YAM): GHD, 81613-06(PRES019)CI WA010-C-01, MARCH 20, 2017
4. FRENCH DRAIN AND TRENCH: GHD BASE PLAN, MARCH 22, 2017

NOTE: CURRENT HORIZONTAL DATUM: SPCS MI SOUTH NAD 83 INTERNATIONAL FEET.

0 100 200ft



FORMER WILLOW RUN POWERTRAIN REDEVELOPMENT AREA
YPSILANTI, MICHIGAN

SWALE TO FIRST FLUSH BASIN C
EXCAVATED MATERIALS MANAGEMENT PLAN

017358-T02

Apr 6, 2017

FIGURE G-1

WORKSHEET FOR REVIEW OF TARGETED EXCAVATION AREA

Area (name/project): **Swale to FFB-C** (includes Bioswales 4AB & 4CD; and N-S swale/drainage-way; also includes an area of PCE contamination and remediation)

Location: SE Quadrant of Slab (see fig 10 and G-1)

Details of Anticipated Excavation

Excavation into: pavement and soil

Approximate volume to be removed from location = 1,800 cu yd pavement; 4,600 cu yd soil

Nature of Targeted Excavation Area

Subject to RCRA Deed Restriction? Yes

- (b) – disturbance of slab,
- (c) – disturbance of storm sewer network (dependent on depth)
- (f) – disturbance of PCE impacted soil
- (g) – disturbance of electrical duct network (potentially)

Subject to TSCA Deed Restriction? Yes, (Former Powerhouse Basement)

Area Known to be Impacted By: LNAPL- Yes; PCE- Yes; As- No; Mn- No

Pavement in contact with LNAPL/PCE/As-Mn? Potentially LNAPL

Pavement “materially contaminated” (e.g., lead based paint)? Not expected

Pavement a public right-of-way? No

Data on Substances in Soil?: Yes, approximately 800 soil samples. Collected from 1989 to 2017.

Excavated material “hazardous waste”? Not expected

Substances in soil exceeding Generic Residential Criteria (substances & criteria):

- 1,1-Dichloroethene: Soil volatilization to indoor air inhalation
- 1,2-Dibromo-3-chloropropane (DBCP): Drinking water protection
- Benzene: Drinking water protection, GSI, soil volatilization to indoor air inhalation
- Chlorobenzene: GSI
- cis-1,2-Dichloroethene: Drinking water protection, GSI, soil volatilization to indoor air inhalation
- Ethylbenzene: Drinking water protection, GSI

- Methylene chloride: Drinking water protection
- o-Xylene: Drinking water protection
- Tetrachloroethene: Drinking water protection, GSI, soil volatilization to indoor air inhalation, infinite source volatile soil inhalation, finite VSIC for 5 meter source thickness, direct contact, soil saturation concentration screening levels
- Toluene: Drinking water protection, GSI
- Trichloroethene: Drinking water protection, GSI, soil volatilization to indoor air inhalation, infinite source volatile soil inhalation, finite VSIC for 5 meter source thickness, finite VSIC for 2 meter source thickness, direct contact
- Vinyl chloride: Drinking water protection, GSI, soil volatilization to indoor air inhalation
- Xylenes (total): GSI
- Naphthalene: GSI
- Phenanthrene: GSI
- Aluminum: Drinking water protection
- Cobalt : Drinking water protection, GSI
- Iron: Drinking water protection, GSI, direct contact
- Manganese: water protection, GSI, particulate soil inhalation, direct contact

Substances in soil exceeding Generic Non-residential Criteria (substances & criteria):

- 1,2-Dibromo-3-chloropropane (DBCP): Nr drinking water protection
- Benzene: Nr drinking water protection
- cis-1,2-Dichloroethene: Nr drinking water protection, nr soil volatilization to indoor air inhalation
- Ethylbenzene: Nr drinking water protection
- Methylene chloride: Nr drinking water protection
- o-Xylene: Nr drinking water protection
- Tetrachloroethene: Nr drinking water protection, nr soil volatilization to indoor air inhalation, nr infinite source volatile soil inhalation, nr finite VSIC for 5 meter source thickness
- Toluene: Nr drinking water protection
- Trichloroethene: Nr drinking water protection, nr soil volatilization to indoor air inhalation, nr infinite source volatile soil inhalation, nr finite VSIC for 5 meter source thickness, nr finite VSIC for 2 meter source thickness
- Vinyl chloride: Nr drinking water protection
- Aluminum: Nr drinking water protection
- Cobalt : : Nr drinking water protection
- Iron: Nr drinking water protection
- Manganese: Nr drinking water protection, nr particulate soil inhalation

Draft Findings as to Excavation & Material Management

1. Requires approval of MDEQ and RACER
2. Standard dust and soil erosion/sediment controls must be provided as appropriate
3. Excavation at PCE area to proceed with:
 - a. Perimeter monitoring for VOCs and contingency plan for exceedance of benchmark triggers
 - b. Soil to be characterized and managed via appropriate off-site disposal
4. Storm sewer is not to be disturbed, unless done pursuant to specifically approved action plan
5. Electrical ductwork shall not be disturbed without RACER and MDEQ approval. TSCA deed restricted area (former Power House basement) requires replacement of any excavated concrete i.e. concrete cover must be re-installed
6. Impermeable cover to be re-established on excavated area
7. Excavated pavement may be re-used for construction (unless found impacted by LNAPL)
8. Non PCE impacted soil, unless impacted by LNAPL, may be placed within Covered Area of property provided clean cover material is established .Several sections of the swale to FFB-C will go through known areas of LNAPL. Most starting depths of LNAPL in these areas are 1-7 feet below ground surface.

Guidance For Excavators

Swale to FFB-C

SOIL &/OR PAVEMENT SHOULD NOT BE RETURNED TO THE EXCAVATION AND SHALL BE STAGED IN DESIGNATED AREAS FOR FURTHER EVALUATION IN ANY OF THE FOLLOWING CASES:

- *Material contains oily substances*
- *Material is noticeably different in appearance (unusually dark stains & or sudden odor) from adjacent excavated material*

IF SOIL &/OR PAVEMENT DO NOT DISPLAY THE ABOVE CHARACTERISTICS, IT CAN BE:

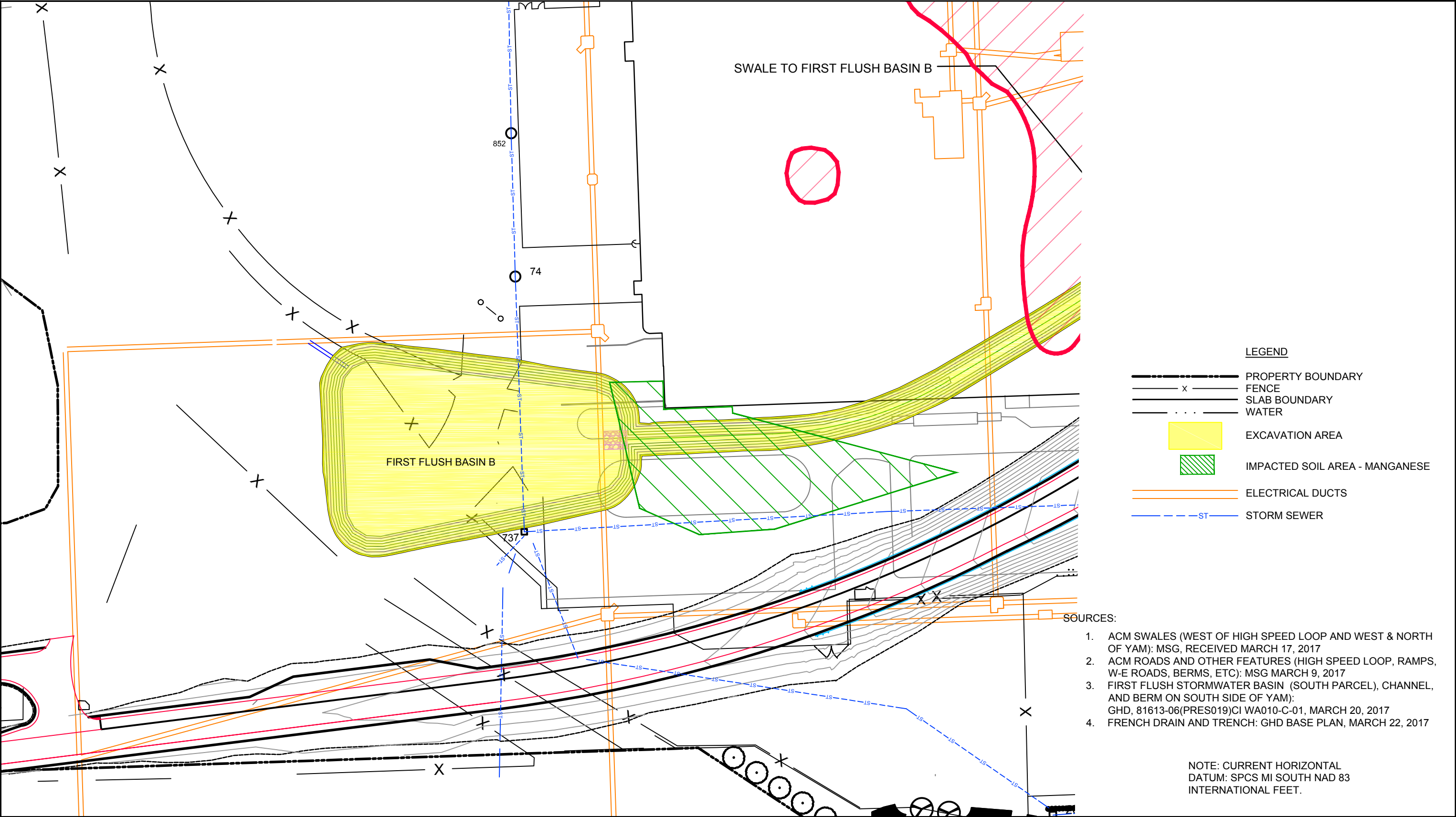
- *Re-used in excavation*
- *Staged in designated areas for reuse elsewhere on site.*

SPECIAL CONSIDERATIONS:

- *Historic electrical ductwork – concrete not to be crushed and re-used. Shall be disposed offsite at an appropriately licensed facility. (Per Figure Fig G-1; - 2-3 electrical duct crossings). TSCA deed restricted area (former Power House basement) requires replacement of any excavated concrete i.e. concrete cover must be re-installed*
- *LNAPL (oily soils) expected to be encountered from several sections of the swale to FFB-C. Most starting depths of LNAPL are 1-7 ft below ground surface*
- *PCE Impacted Area- Per Figure G-1, any excavation done in the PCE impacted area requires perimeter monitoring for VOCs and a contingency plan for exceedance of benchmark triggers. Excavated soil from this area needs to be characterized and managed via appropriate off-site disposal*

Appendix H

Excavation Area 1 - First Flush Basin B



WORKSHEET FOR REVIEW OF TARGETED EXCAVATION AREA

Area (name/project): First Flush Basin B (FFB-B)

Location: At/Off SW Corner of Main Slab (see fig 10 and Fig H-1)

Details of Anticipated Excavation

Excavation into: both pavement and soil

Approximate volume to be removed from location = 1,600 cu yd pavement; 13,600 cu yd soil

Nature of Targeted Excavation Area

Subject to RCRA Deed Restriction? Yes

- (b) – disturbance of slab, concrete apron, parking lot, etc.
- (e) - disturbance of cover and excavation in Mn impacted area
- (g) - disturbance of electrical duct network

Subject to TSCA Deed Restriction? No

Known to be Impacted By: LNAPL- No; PCE- No; As- No; Mn- Yes

Pavement in contact with LNAPL/PCE/As-Mn? Potentially Mn

Pavement “materially contaminated” (e.g., lead based paint)? Not expected

Pavement a public right-of-way? No

Data on Substances in Soil: Yes, 45 soil samples collected from this area. Sample collection dates range from 1987-2013. A few data points on east of area

Excavated material “hazardous waste”? Not expected

Substances in soil exceeding Generic Residential Criteria (substances & criteria):

- Manganese – Drinking water protection, GSI, particulate soil inhalation
- Iron – Drinking water protection

Substances in soil exceeding Generic Non-residential Criteria (substances & criteria):

- Manganese – Particulate soil inhalation
- Iron – Drinking water protection

Draft Findings as to Excavation & Material Management

1. Requires approval of MDEQ and RACER
2. Standard dust and soil erosion/sediment controls must be provided as appropriate
3. Excavation to proceed in manner that prevents (and demonstrates) fugitive dust i generation and transport beyond excavation area, temporary staging areas and final placement area. (i.e., adequate observation & monitoring of conditions, controls such as wetting and cover, etc.)
4. Storm sewer is not to be disturbed, unless done pursuant to specifically approved action plan
5. Electrical duct network to not be disturbed without RACER and MDEQ approval
6. Impermeable cover to be re-established on excavated area
7. Excavated soil may be placed within Covered Area of property provided clean cover material is established
8. Excavated pavement may be re-used for construction
9. No LNAPL data points in the area of FFB-B. LNAPL not expected to be encountered

Guidance For Excavators FFB-B

SOIL &/OR PAVEMENT SHOULD NOT BE RETURNED TO THE EXCAVATION AND SHALL BE STAGED IN DESIGNATED AREAS FOR FURTHER EVALUATION IN ANY OF THE FOLLOWING CASES:

- *Material contains oily substances*
- *Material is noticeably different in appearance (unusually dark stains & or sudden odor) from adjacent excavated material*

IF SOIL &/OR PAVEMENT DO NOT DISPLAY THE ABOVE CHARACTERISTICS, IT CAN BE:

- *Re-used in excavation*
- *Staged in designated areas for reuse elsewhere on site.*

SPECIAL CONSIDERATIONS:

- *Historic electrical ductwork – concrete not to be crushed and re-used. Shall be disposed offsite at an appropriately licensed facility. (Per Figure Fig H-1; - 1-2 electrical duct crossings)*
- *Manganese Impacted soils expected to be encountered on the east side of FFB-B. Generation and transport of fugitive dust during excavation and staging of such soils is to be prevented. Impermeable cover to be re-established on excavated area*

Appendix I

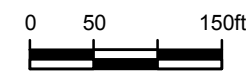
Excavation Area 5 - French Drain/Utility Trench



- LEGEND**
- PROPERTY BOUNDARY
 - x --- FENCE
 - ===== SLAB BOUNDARY
 - ===== ELECTRICAL DUCTS
 - EXCAVATION AREA
 - APPROXIMATE LNAPL EXTENTS
 - ST--- STORM SEWER

- SOURCES:**
1. ACM SWALES (WEST OF HIGH SPEED LOOP AND WEST & NORTH OF YAM): MSG, RECEIVED MARCH 17, 2017
 2. ACM ROADS AND OTHER FEATURES (HIGH SPEED LOOP, RAMPS, W-E ROADS, BERMS, ETC): MSG MARCH 9, 2017
 3. FIRST FLUSH STORMWATER BASIN (SOUTH PARCEL), CHANNEL, AND BERM ON SOUTH SIDE OF YAM): GHD, 81613-06(PRES019)CI WA010-C-01, MARCH 20, 2017
 4. FRENCH DRAIN AND TRENCH: GHD BASE PLAN, MARCH 22, 2017

NOTE: CURRENT HORIZONTAL DATUM: SPCS MI SOUTH NAD 83 INTERNATIONAL FEET.



FORMER WILLOW RUN POWERTRAIN REDEVELOPMENT AREA
YPSILANTI, MICHIGAN

**FRENCH DRAIN
EXCAVATED MATERIALS MANAGEMENT PLAN**

017358-T02
Apr 27, 2017

FIGURE I-1

WORKSHEET FOR REVIEW OF TARGETED EXCAVATION AREA

Area (name/project): **French Drain/Utility Trench**

Location: East & South Sides of YAM Property (see fig 10 and fig I-1)

Details of Anticipated Excavation

Excavation into: pavement and soil

Approximate volume to be removed from location: 1,000 cu yd pavement and 6,200 cu yd soil

Nature of Targeted Excavation Area

Subject to RCRA Deed Restriction? Yes

- (b) – disturbance of slab,
- (g) – disturbance of electrical duct network

Subject to TSCA Deed Restriction? No – Non-TSCA regulated PCBs in present in historical electrical duct work

Area Known to be Impacted By: LNAPL- Yes; PCE- No; As- No; Mn- No

Pavement in contact with LNAPL/PCE/As-Mn? Potentially LNAPL

Pavement “materially contaminated” (e.g., lead based paint)? Not expected

Pavement a public right-of-way? No

Data on Substances in Soil?: Yes, 80 soil samples collected from this area. Sample collection dates range from 1991-2017

Excavated material “hazardous waste”? Not expected

Substances in soil exceeding Generic Residential Criteria (substances & criteria):

- Benzene: Drinking water protection
- Ethylbenzene: GSI
- Tetrachloroethene: Drinking water protection, GSI
- Trichloroethene: Drinking water protection
- Vinyl chloride: Drinking water protection, GSI, soil volatilization to indoor air inhalation
- Phenanthrene: GSI
- Iron: Drinking water protection

Substances in soil exceeding Generic Non-residential Criteria (substances & criteria):

- Benzene: Nr drinking water protection
- Tetrachloroethene: Nr drinking water protection
- Trichloroethene: Nr drinking water protection
- Vinyl chloride: Nr drinking water protection
- Iron: Nr drinking water protection

Draft Findings as to Excavation & Material Management

1. Requires approval of MDEQ and RACER
2. Standard dust and soil erosion/sediment controls must be provided as appropriate
3. Electrical duct network shall not be disturbed without RACER and MDEQ approval
4. Impermeable cover to be re-established on excavated area
5. Excavated pavement may be re-used for construction (unless found impacted by LNAPL)
6. Excavated soil unless impacted by LNAPL may be placed within Covered Area of property provided clean cover material is established. Several sections of the French drain will go through known areas of LNAPL. Most depths of LNAPL in these areas are 0.5-8 feet below ground surface

Guidance For Excavators

French Drain/Utility Trench

SOIL &/OR PAVEMENT SHOULD NOT BE RETURNED TO THE EXCAVATION AND SHALL BE STAGED IN DESIGNATED AREAS FOR FURTHER EVALUATION IN ANY OF THE FOLLOWING CASES:

- *Material contains oily substances*
- *Material is noticeably different in appearance (unusually dark stains & or sudden odor) from adjacent excavated material*

IF SOIL &/OR PAVEMENT DO NOT DISPLAY THE ABOVE CHARACTERISTICS, IT CAN BE:

- *Re-used in excavation*
- *Staged in designated areas for reuse elsewhere on site.*

SPECIAL CONSIDERATIONS:

- *Historic electrical ductwork – concrete not to be crushed and re-used. Shall be disposed offsite at an appropriately licensed facility. (Per Figure Fig I-1; = 2-3 electrical duct crossings)*
- *LNAPL (oily soils) expected to be encountered on the north/south trench run on east Side of YAM. Depth of LNAPL varies from 0.5-8 ft below ground surface*

Appendix J

Landowners Approvals and Notifications to MDEQ

Landowner approvals and notification documents will be added and considered part of this plan when completed and issued by involved parties.

Appendix K

RACER and MDEQ Approval Form

DRAFT (6-2-17)

EXAMPLE EXCAVATION REVIEW AND APPROVAL FORM

Willow Run Powertrain Redevelopment Area Proposed Excavation Review

Submittal No./Ref. _____

Proposed Excavation/Redevelopment Area:

Submitted By: _____ (name & signature) Date: _____

The review of the proposed excavation and redevelopment activities described in the submittal and/or area referenced above is limited to general compliance with the overall environmental remediation of the former Willow Run Powertrain Site including modifications to deed restrictions requiring Revitalizing Auto Communities Environmental Response Trust (RACER) and Michigan Department of Environmental Quality (MDEQ) approval. The contractor is responsible for performing the work in accordance with property owners obligations, regulatory requirements, and consistent with the Excavated Materials Management Plan (GHD, June 2017) including specific conditions of approval specified in the plan or as identified below.

COMMENTS

ACTION

- ☐ Reviewed. Accepted without comment.
- ☐ Reviewed. Exceptions Noted. Resubmission not required.
- ☐ Reviewed. Exceptions Noted. Revise and resubmit.
- ☐ Other. _____

APPROVED BY:

RACER	MDEQ
Name:	Name:
Signature:	Signature:
Date:	Date:

www.ghd.com

