



Memorandum

To: Peter Ramanauskas/EPA

Ref. No.: 017322

From: Thomas Kinney/MC/ds/36

Date: 10/12/2015

CC: Dave Favero/RACER; Grant Trigger/RACER

Re: PCB Excavation

1. Introduction

GHD Services Inc. (GHD) is providing this summary on behalf of Revitalizing Auto Communities Environmental Response (RACER) Trust of the excavation of PCB impacted soil located in the southern portion of the Site at the former PCC-Validation (Site) facility located in Pontiac, Michigan.

2. Background

The PCB soil impacts were first discovered during a 2009 Phase II Environmental Site Assessment (ESA) at a depth of 12-14 feet (ft) below ground surface (bgs) at BH72-08 (located in the southern portion of former Plant 3). The PCB impacts at BH72-08 were delineated to below 1 part per million (ppm) by soil samples collected in 2012 from borings BH102-12, BH103-12, BH104-12, BH105-12 and BH106-12. In 2014 SME collected soil samples near BH72-08 on behalf of the purchaser (M1 Concourse, LLC) of the PCC-Validation property. Soil borings were installed near and around BH72-08 and PCBs were detected in certain soil samples above 100 ppm. SME conducted a second round of soil borings and sampling in 2015 to further delineate the impacts discovered in 2014. Although helpful, the delineation borings were inadequate to fully delineate impacts for purposes of excavation. GHD submitted a work plan for pre-excavation sampling dated August 20, 2015 to fulfill any data gaps from SME's 2015 investigation. The EPA responded with an email dated August 26, 2015 with additional requests for analysis and the EPA's suggested additional boring locations (which were added to the work plan). The additional field work to fulfill data gaps was completed on August 31, 2015 and results were summarized and presented to the EPA in an email dated September 11, 2015. On September 24, 2015 a notification for self-implemented removal of PCBs (excavation work) was sent to the EPA for review. On August 25, 2015, the EPA responded with a request for additional sampling and field verification for the excavation work (which was added to the work plan). The excavation work, sampling and field verification was completed on October 9, 2015 and further discussed below.

September

3. PCB EXCAVATION

On October 9, 2015, PCB impacts exceeding 100 ppm were excavated and removed from the Site. The following work was completed:

-) Prior to excavation, five areas (A, B, C, D, and E) were surveyed and flagged (figure 1). Ground surface elevations were collected from the five areas.
-) Five separate areas (A, B, C, D, and E) were excavated to varying depths.
-) Geology of excavated areas was fairly consistent. Fill material (sand/clay mix) was encountered from surface to approximately 3-6 feet below ground surface (bgs). Asphalt (former parking lot?) was encountered in each excavation at approximately 3-6 feet bgs. Stiff, blue/gray clay was encountered below the asphalt to maximum depth excavated.
-) Approximately 50-60 cubic yards (waiting on manifests for confirmation) of soil was removed from the five separate areas.
-) Field test kits and soil analytical results (pending) were conducted in Areas A, C and E. Soil samples (for test kits and soil analysis) were collected from depths of known PCB impacts.
-) Field test kits (to 50 PPM) were used to verify the southern side of excavation A.
-) Field test kits (to 50 PPM) were used to verify the southern, eastern and western sides of excavation C.
-) Field test kits (to 50 PPM) were used to verify the northern, southern, eastern and western sides of excavation E.
-) All field tests kits were negative (<50 PPM) except the eastern sidewall of excavation C.
-) Based on the positive field test kit at the eastern sidewall of excavation C, an additional 3.5 feet of sidewall was over-excavated. Re-tested sidewall samples of the over excavated eastern sidewall was negative (<50 PPM). See figure 1 for over-excavated sidewall area.
-) Soil samples were collected from each field test kit location and submitted for laboratory analysis. Results are pending.
-) Following excavation, the areas were re-surveyed and ground surface elevations from the base of the excavations were collected from the five areas.

Figure 1 provides a map with excavation boundaries (surveyed from floor of excavation corners) and field test sample locations. See Table 1 for a sample key and test kit results summary. See Table 2 for a summary of excavation elevations. A photographic log of excavations and field test kits are provided in Attachment 1.

4. Closing

Upon completion of the excavation (and awaiting analytical results), PCB impacts exceeding 100 PPM have been delineated and are assumed to have been removed. Any risk for potential exposure is mitigated by the proposed clay cap to be installed by SME and M1. Further, the area will be deed restricted and designated low occupancy. No future excavation or mitigation (other than indicated above) is anticipated at this time.

Encl: Figure 1 – Excavation overview diagram
Table 1 – Sample key and test kit results
Table 2- Excavation summary
Attachment 1 – Photographic log of excavation and field test kits

Manifests included

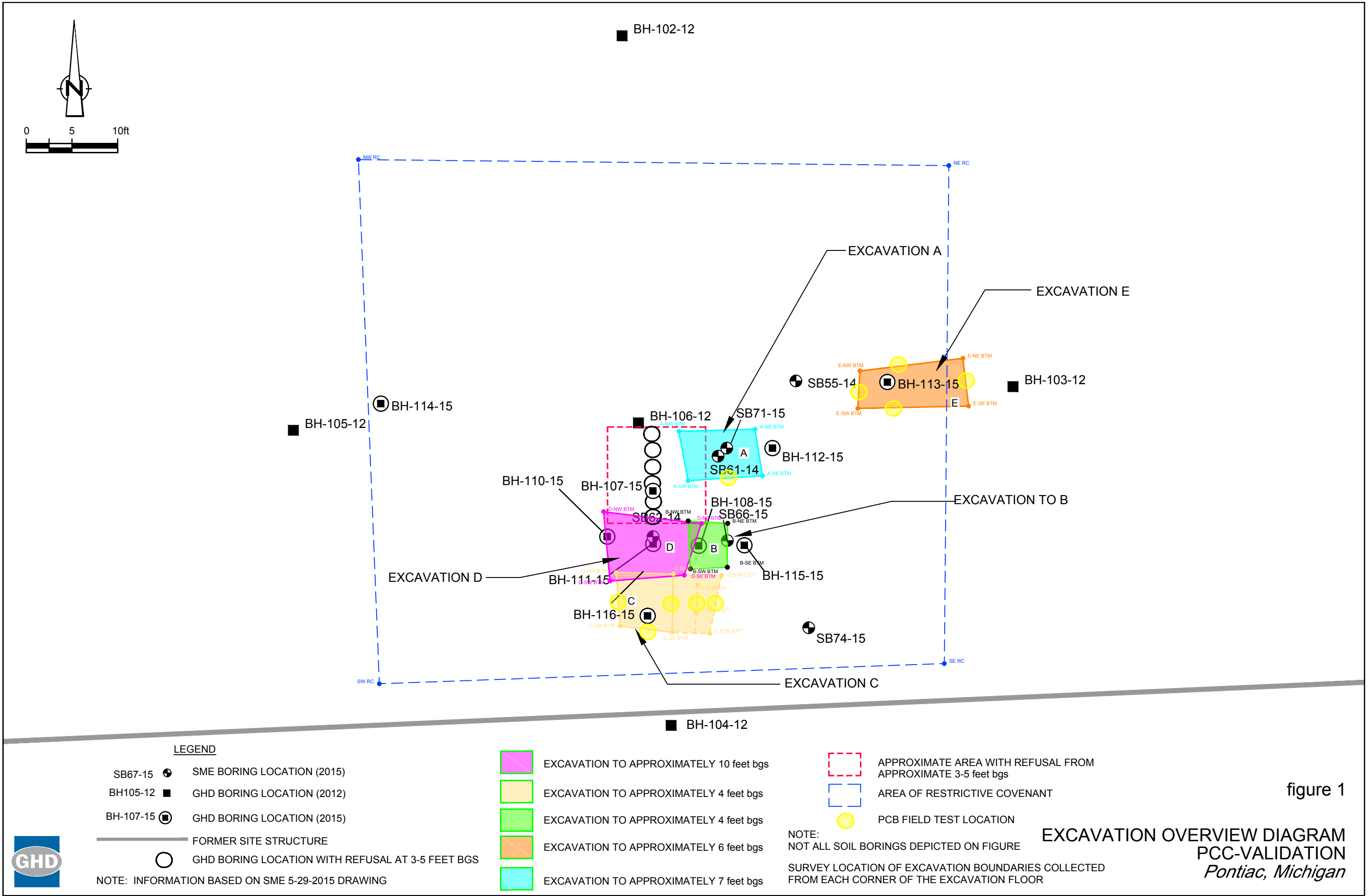


figure 1

Table 1

Sample Key and Test Kit Results
PCC-Validation
Pontiac, Michigan

Sample ID (For Lab Analysis)	Location Description	Soil Boring and Depth Historic PCB Impacts Encountered (Ft BGS)	Depth Soil Sample Collected for Test Kit/Laboratory Analysis (Ft BGS)	Field Test Kit Results	PCB Lab Analytical Results (PPM)		Notes
EXCAVATION A							
NA	North Sidewall	NA	NA	NA	NA		
SO-17322-100915-MC-005	South Sidewall	SB71-15 (5-5.5)	(4-6)	<50 PPM	44		
NA	East Sidewall	NA	NA	NA	NA		
NA	West Sidewall	NA	NA	NA	NA		
EXCAVATION B							
NA	North Sidewall	NA	NA	NA	NA		
NA	South Sidewall	NA	NA	NA	NA		
NA	East Sidewall	NA	NA	NA	NA		
NA	West Sidewall	NA	NA	NA	NA		
EXCAVATION C							
SO-17322-100915-MC-008	West Sidewall	BH116-15 (2-4)	(2-4)	<50 PPM	0.020		
SO-17322-100915-MC-006	South Sidewall	BH116-15 (2-4)	(2-4)	<50 PPM	0.860		
NA	East Sidewall	BH116-15 (2-4)	(2-4)	>50 PPM***	NA		
NA	East Sidewall + 1.5*	BH116-15 (2-4)	(2-4)	>50 PPM***	NA		
SO-17322-100915-MC-009	East Sidewall +3.5**	BH116-15 (2-4)	(2-4)	<50 PPM	0.081		
EXCAVATION D							
NA	North Sidewall	NA	NA	NA	NA		
NA	South Sidewall	NA	NA	NA	NA		
NA	East Sidewall	NA	NA	NA	NA		
NA	West Sidewall	NA	NA	NA	NA		
EXCAVATION E							
SO-17322-100915-MC-001	North Sidewall	BH113-15(4-6)	(4-6)	<50 PPM	Non-Detect		
SO-17322-100915-MC-003/010	South Sidewall	BH113-15(4-6)	(4-6)	<50 PPM	Non-Detect/Non-Detect		Duplicate sample ID - SO-17322-100915-MC-010
SO-17322-100915-MC-002	East Sidewall	BH113-15(4-6)	(4-6)	<50 PPM	0.029		
SO-17322-100915-MC-004	West Sidewall	BH113-15(4-6)	(4-6)	<50 PPM	Non-Detect		MS/MSD

Notes:

* - Represents 1.5 foot over excavation of eastern sidewall

** - Represents 3.5 foot over excavation of eastern sidewall

***- Indicates field test exceeded 50 PPM. The sidewall was over excavated until field test indicated <50 PPM.

NA - Sample not collected, not analyzed or data not available

Ft BGS - Feet below ground surface

Table 2

Excavation Summary
PCC-Validation
Pontiac, Michigan

Survey Location Description	Starting Ground Surface Elevation (Ft AMSL)	Final Ground Surface Elevation (Ft AMSL)*	Total Depth Excavated (Ft BGS)	Proposed Depth Excavated (Ft BGS)	Analytical Results
EXCAVATION A					
North-West Corner	955.017	948.111	6.91	7	SB71-15 (5-5.5) 140 PPM SB71-15 (7-7.5) 12 PPM
North-East Corner	954.622	947.657	6.96	7	
South-West Corner	954.234	948.193	6.04	7	
South-East Corner	954.16	947.713	6.45	7	
EXCAVATION B					
North-West Corner	953.517	949.584	3.93	4	BH108-15 (2-4) 110 PPM BH108-15 (4-6) 1.9 PPM
North-East Corner	953.312	949.387	3.93	4	
South-West Corner	952.888	949.254	3.63	4	
South-East Corner	952.803	949.266	3.54	4	
EXCAVATION C					
North-West Corner	953.167	948.727	4.44	4	BH116-15 (2-4) 160 PPM BH116-15 (4-6) 0.54 PPM
South-West Corner	952.152	948.638	3.51	4	
North-East Corner+3.5**	952.838	948.547	4.29	4	
South-East Corner+3.5**	952.25	948.374	3.88	4	
EXCAVATION D					
North-West Corner	953.786	944.286	9.50	10	BH111-15 (8-10) 140 PPM BH111-15 (10-12) 5.8 PPM
North-East Corner	953.431	943.585	9.85	10	
South-West Corner	953.188	943.967	9.22	10	
South-East Corner	952.878	943.431	9.45	10	
EXCAVATION E					
North-West Corner	954.746	948.817	5.93	6	BH113-15 (4-6) 120 PPM BH113-15 (6-8) <50 PPM East sidewall 0.029 PPM
North-East Corner	953.28	948.531	4.75	6	
South-West Corner	954.892	948.774	6.12	6	
South-East Corner	953.503	948.572	4.93	6	

Notes:

* - Final ground surface elevations collected from floor of excavations at specified locations

** - Represents 3.5 foot overexcavation of eastern sidewall

Ft AMSL - Feet above mean sea level

Ft BGS - Feet below ground surface



Excavation A facing North sidewall



Site Photographs



Excavation B facing East sidewall



Site Photographs



Excavation C facing east sidewall at 0 foot over excavation



Site Photographs



Excavation C facing east sidewall at 1.5 foot over excavation



Site Photographs



Excavation C facing east sidewall at 3.5 foot over excavation



Site Photographs



Excavation D facing Northeast corner



Site Photographs



Excavation E facing West sidewall



Site Photographs



Field test kit results for excavation E – North, South, East and West sidewalls



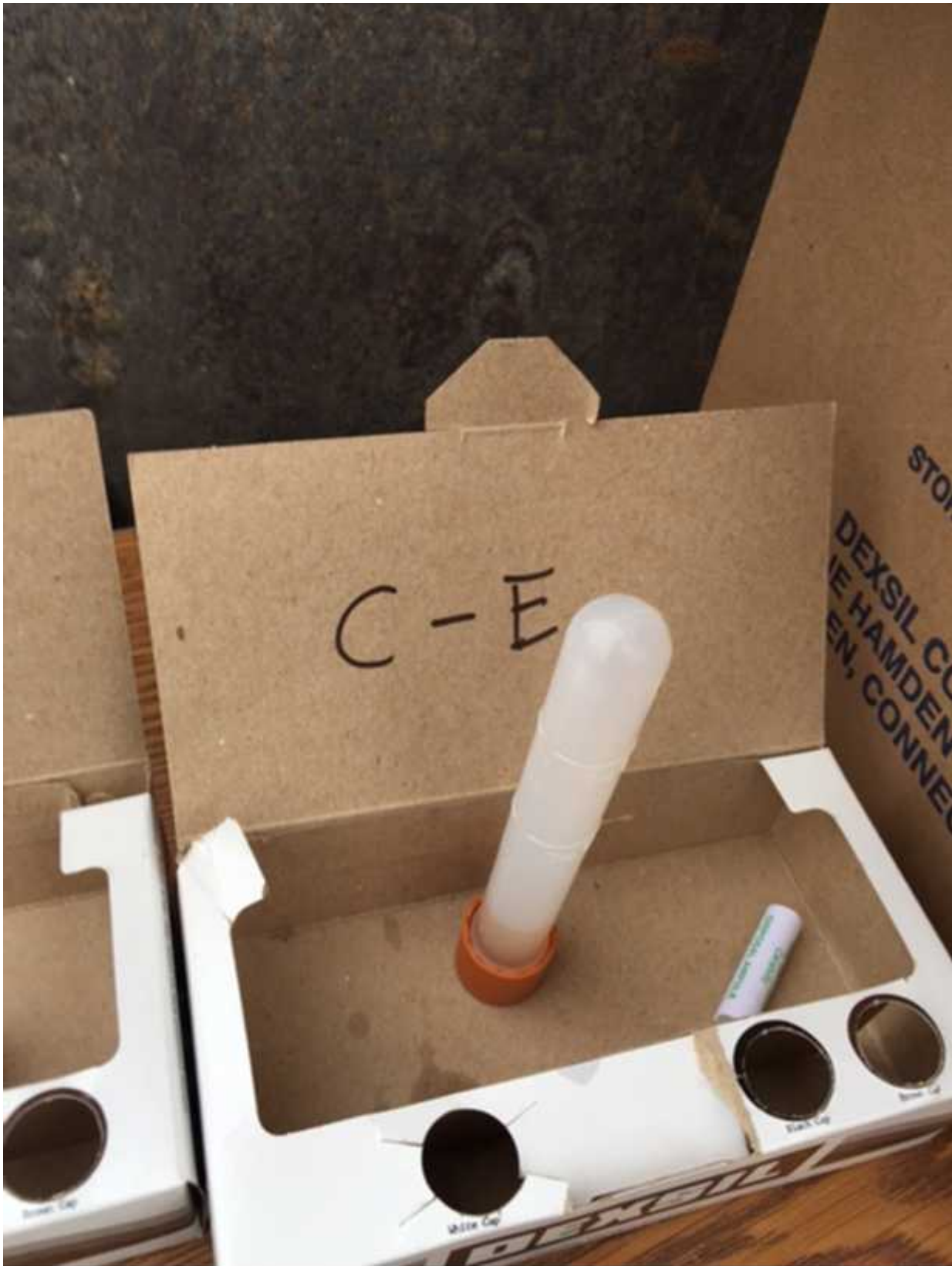
Site Photographs



Field test kit results for excavation C – South, East (0 foot over excavation) and West sidewalls & Excavation E – South Sidewall



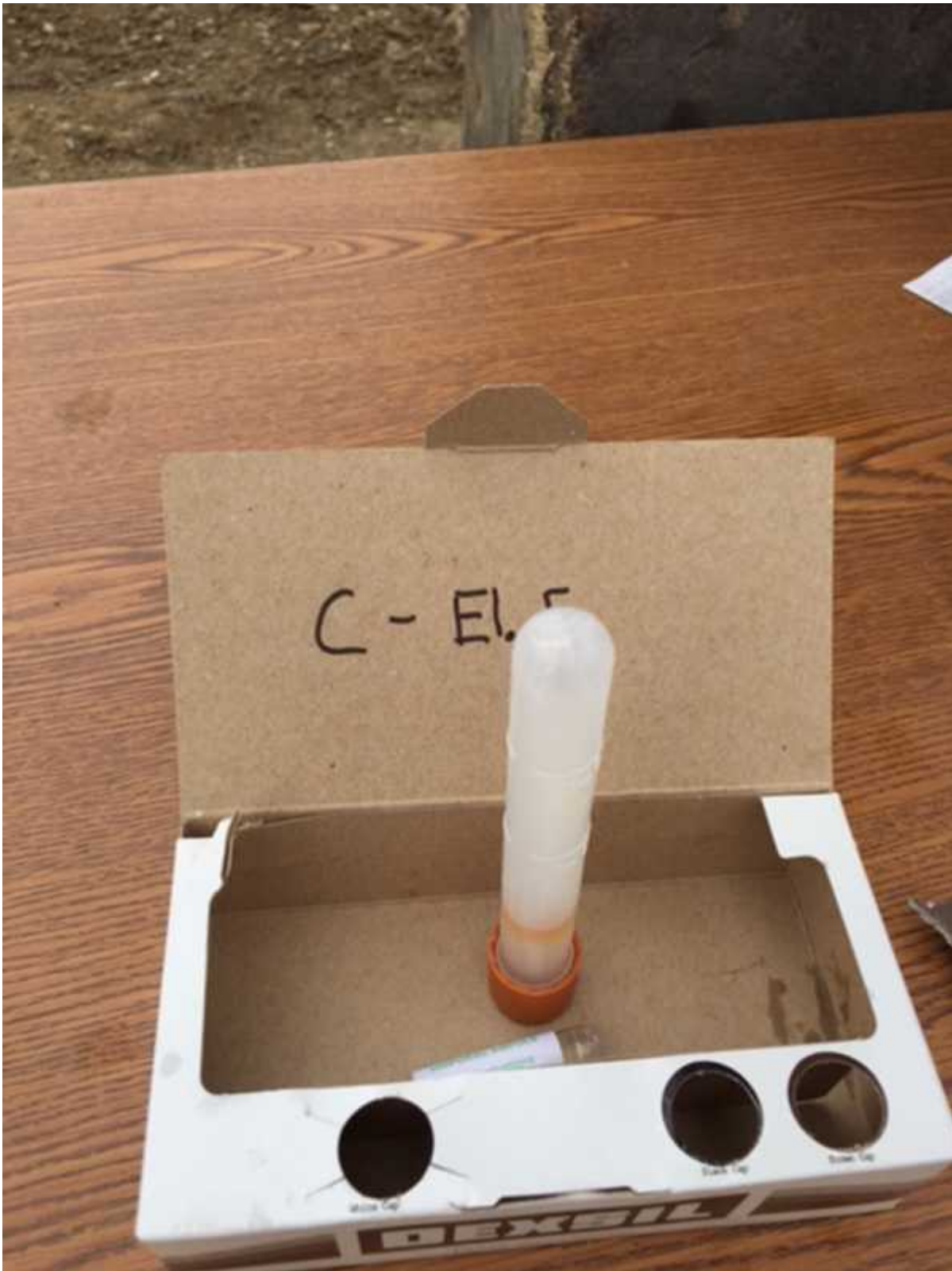
Site Photographs



(Close-up photo) Field test kit results for excavation C – East 0 feet over excavated sidewall



Site Photographs



Field test kit results for excavation C – East 1.5 feet over excavated sidewall



Site Photographs



Field test kit results for excavation C – East 3.5 feet over excavated sidewall



Site Photographs

Wayne Disposal, Inc.
49350 North I-94 Service Drive, Belleville, Michigan 48111

Receipt

JOB SITE SERVICES INC
4395 WILDER ROAD
BAY CITY, MI 48706

Receipt ID: 1256945
EQ Account #: 9015
Manifest / BOL: 015169790JJK
Transporter: SC
Date: 10/09/2015
Time In: 12:12 PM
Time Out: 1:12 PM

Line	Description Generator	Qty. Unit
1 - 1	J158052WDI - PCB Impacted Soil	60.820 TONS
	Hazardous Surcharge Ton	60.820 TONS
	MID980568836 RACER TRUST	
	Gross: 182,240 Tare: 60,600 Net: 121,640	
2	Wayne Disposal Host Community Agreement Royalty Fee	60.820 TONS
	MID980568836 RACER TRUST	
	Gross: 182,240 Tare: 60,600 Net: 121,640	

Wayne Disposal, Inc.
49350 North I-94 Service Drive, Belleville, Michigan 48111

Receipt

JOB SITE SERVICES INC
4395 WILDER ROAD
BAY CITY, MI 48706

Receipt ID: 1256965
EQ Account #: 9015
Manifest / BOL: 015169791JJK
Transporter: SC
Date: 10/12/2015
Time In: 7:29 AM
Time Out: 8:44 AM

Line	Description Generator	Qty. Unit
1 - 1	J158052WDI - PCB Impacted Soil	42.970 TONS
	Hazardous Surcharge Ton	42.970 TONS
	MID980568836 RACER TRUST	
	Gross: 149,000 Tare: 63,060 Net: 85,940	
2	Wayne Disposal Host Community Agreement Royalty Fee	42.970 TONS
	MID980568836 RACER TRUST	
	Gross: 149,000 Tare: 63,060 Net: 85,940	

NO SALVAGING ON PREMISES