



MEMORANDUM

19 August 2011
File No. 37517-003

TO: RACER Trust: Grant Trigger
MDEQ: Karen Williams

C: RACER Trust David Favero

FROM: Haley & Aldrich of Michigan
Derek C. Kaiding, P.E.

SUBJECT: Evaluation of Soil Data Generated by The Traverse Group at
6241 Cass Avenue, Detroit, MI, Site # 1294

We have evaluated the above-referenced soil data in context with the current Non-Residential Generic Cleanup Criteria and Screening Levels of Part 201 of the Michigan Natural Resources and Environmental Protection Act, 1994 Public Act 451 (Part 201), dated 25 March 2011. Based on this review we have concluded that no further action is warranted regarding arsenic-/lead-contaminated soil, if future use is restricted to non-residential. However, limited additional delineation of PAH-contaminated soil is recommended, consistent with the 26 May 2010 Remediation Cost Estimate Summary (RCES) for this property. Additional background and discussion of these issues are provided below.

As you know, the referenced data are reported in partial reports prepared by The Traverse Group (Traverse) for GM related to Phase II and Phase III Environmental Site Assessment work performed in March and August 2007 (Traverse 2007a and 2007b). These reports present screening results and associated conclusions regarding the referenced data, with respect to the superseded 12 December 2004 Part 201 Residential & Commercial I Generic Cleanup Criteria and Screening Levels. The RCES for this property was prepared based on these screening results and associated conclusions. The RCES calls for further investigation and follow-up remediation of arsenic-/lead-contaminated soil, as well as PAH-contaminated soil.

We have reviewed the instances where the Traverse reports identify arsenic, lead, and/or PAHs to exceed the superseded 12 December 2004 Part 201 Residential & Commercial I Generic Cleanup Criteria and Screening Levels, and have, as appropriate, compared the reported concentrations of these contaminants to the corresponding 25 March 2011 Part 201 Generic Cleanup Criteria and Screening Levels.

Traverse 2007b indicates that the Drinking Water Protection and Groundwater/Surface Water Interface Protection pathways are not relevant for the property. This conclusion appears to have been adopted by the RCES, since there is no consideration of these pathways in the RCES. As such, the only potentially "actionable" exceedances of the superseded 12 December 2004 Part 201 Residential & Commercial I Generic Cleanup Criteria and Screening Levels pertains to the Direct Contact pathway. Further, the RCES considers that the future use of the property will be restricted to commercial uses via deed

restrictions. Accordingly, we have compared the concentrations of arsenic, lead, and PAHs identified by Traverse to exceed the associated superseded 12 December 2004 Part 201 Residential & Commercial I Direct Contact Cleanup Criteria to the associated the 25 March 2011 Part 201 Nonresidential Generic Direct Contact Cleanup Criteria.

Based on our comparison of the referenced data to the current Part 201 Nonresidential Generic Direct Contact Cleanup Criteria, no arsenic- or lead-containing soil warrants further investigation or remediation, and only one instance of PAH-containing soil warrants further investigation and possible remediation.

The RCES considers 150 cubic yards of arsenic-/lead-contaminated soil needing to be removed and disposed. This remediation is not warranted based on the criteria comparisons and intended future use noted above.

As for PAH-contaminated soil, such instances involve soil boring locations identified by Traverse 2007b as locations GP-3 and DB-3, as well as location GP-5. Benzo(a)pyrene concentrations of 2,600 micrograms per kilogram (ug/kg) and 2,400 ug/kg were reported in association with the 2- to 4-foot depth interval at locations GP-3 and GP-5, respectively. These concentrations do not exceed the associated 25 March 2011 Part 201 Nonresidential Generic Direct Contact Cleanup Criteria (8,000 ug/kg). Therefore, no further action is warranted at these locations. A benzo(a)pyrene concentration of 12,400 ug/kg was reported in association with the 2- to 4-foot depth interval location DB-3, which is denoted (Traverse 2007b) to be among the points of delineation associated with location GP-3. This concentration does exceed the 25 March 2011 Part 201 Nonresidential Generic Direct Contact Cleanup Criteria, and warrants further action.

A Draft Site Map dated 14 May 2009, that was prepared by ARCADIS as a member of Encore Environmental Consultants, LLC (DRAFT Site Map), illustrates sampling location DB-3 relative to nearby sampling locations denoted as GP-3, DB-1, DB-2, and DB-4. Based on the review of the DRAFT Site Map, the extent of benzo(a) pyrene exceeding the current Part 201 Nonresidential Generic Direct Contact Cleanup Criteria at location DB-3 appears to be delineated to the north and northeast by location DB-1, DB-2, and GP-3, but further delineation appears to be needed to the east, south, and west.

The estimated PAH-contaminated soil volume subject to removal (Traverse 2007b) of 150 cubic yards apparently involved soil associated with both of the separate areas involving locations GP-3 and DB-3, as well as location GP-5. Since our evaluation concludes that no further action is warranted at locations GP-3 or GP-5, based on the discussions provided above, the volume of soil subject to removal at location DB-3 would be expected to be less than 150 cubic yards. Although, this volume cannot be further evaluated without additional field reconnaissance, since the Draft Site Map does not present an associated scale.

Unless you wish otherwise, we will proceed with our development of a scope of work, cost estimate, and schedule to cover the initial steps to characterize the PAH-contaminated soil at location DB-3, consistent with the RCES.

If you have any questions concerning this information, or would like to discuss these matters in more detail, please do not hesitate to call us.

DCK/

References:

Encore Environmental Consultants, LLC, 2009, *Draft Site Map*. 14 May 2009.

The Traverse Group, 2007a. *Draft Phase II Environmental Site Assessment - Summary of Findings, General Motors Parking Lot 8, 6241 Cass Avenue Detroit, Wayne County, Michigan 48202*. 16 March 2007.

The Traverse Group, 2007b. *Draft Lot 8 Delineation – Summary of Findings, General Motors Parking Lot 8, 6241 Cass Avenue, Detroit, Wayne County, Michigan 48202*. 27 August 2007.