



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 • (217) 782-2829

PAT QUINN, GOVERNOR

LISA BONNETT, DIRECTOR

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217/524-3300

December 23, 2014

Certified Mail

7012 0470 0001 2976 3793

RACER Properties, LLC
Attn: Robert W. Hare, P.E.
2930 Ecorse Road
Ypsilanti, MI 48198

Re: 1838040024 -- Vermilion County
General Motors Landfill
Permit No. 1985-7-OP
Supplemental Permit No. 2013-382-SP
Log No. 2013-382
Permit Landfill 807 File
Permit Approval

Dear Mr. Hare:

Supplemental permit is hereby granted to RACER Trust Landfill, as owner and Revitalizing Auto Communities Environmental Response Trust operator, to modify the maintenance of the above referenced facility pursuant to 35 Illinois Administrative Code (hereinafter IAC) Subtitle G, Part 807, all in accordance with the application prepared and signed and sealed by Steven E. Davis, P.E., signature dated July 29, 2013 of Conestoga-Rovers and Associates. Final plans, specifications, application and supporting documents as submitted and approved shall constitute part of this permit and are identified on the records of the Illinois Environmental Protection Agency (Illinois EPA), Bureau of Land by the permit number(s) and log number(s) designated in the heading above.

Supplemental Permit No. 2013-382 approves:

- A. Intrawell values for the List 1 and List parameters at wells G14D, G14S, G45S, G04S and G05S;
- B. Abandonment of wells P-1S, G19S, G31D, G32S, G41D, G42S, G42DR, and G46S;
- C. Installation of a new downgradient well at the boring location containing the temporarily well currently referred to as G47; and

D. New statistical methodology.

Pursuant to Section 39(a) of the Illinois Environmental Protection Act (Act) this permit is issued subject to the development, operating and reporting requirements for Solid Waste Facilities in 35 Ill. Adm. Code, Part 807, the standard conditions attached hereto, and the following special conditions. In case of conflict between the permit application and these conditions (both standard and special), the conditions of this permit shall govern.

1. Your monitoring program has been approved and revised in accordance with Attachments A and B to this permit and is subject to the conditions contained therein. In Attachment A, Conditions 4, 6, 17, and 18 were revised and Condition 25 was deleted. A new condition 25 was added. In Attachment B, the statistics were removed and a table of intrawell values was added.
2. During the post-closure care period, water quality records shall be maintained at the office of the site operator and shall be reviewed quarterly. A water quality report shall be submitted quarterly. If the owner/operator or the Illinois EPA's Bureau of Land determines that adverse trends are developing, further investigation is to be performed. If corrective action becomes necessary, a plan is to be developed by the operator and submitted to the Permit Section, Bureau of Land for approval.
3. During the post-closure care period, the owner and operator shall monitor gas, water and settling and shall take whatever remedial action is necessary to abate any gas, water or settling problems which appear during that time. Post-closure groundwater monitoring shall be conducted and reported to the Illinois EPA on a quarterly basis for the monitoring wells and parameters identified in Attachment A of Supplemental Permit No. 2010-389-SP.
4. The Illinois EPA reserves the right to require installation of additional monitoring devices, to alter the selection of parameters to be analyzed and to alter monitoring frequencies as may be necessary to fulfill the intent of the Environmental Protection Act.
5. This permit is subject to review and modification by the Illinois EPA as deemed necessary to fulfill the intent and purpose of the Environmental Protection Act, and all applicable environmental rules and regulations.
6. The Illinois EPA has certified the closure of this site. The three-year minimum post-closure care period began August 31, 2000.
7. Financial assurance shall be maintained by the operator in accordance with 35 Ill. Adm. Code, Subtitle G, Part 807, Subpart F in an amount equal to the current cost estimate for closure and post-closure care. The current cost estimate is \$272,114.20.

8. The operator shall file revised cost estimates for post-closure care at least every two years in accordance with 35 Ill. Adm. Code, Subtitle G, Part 807, Subpart F. The next revised cost estimates are due on or before January 1, 2012.

NOTE: As of December 22, 2014, the operator has not complied with this condition.

9. Prior conduct certification is no longer required because this facility has been certified to have completed closure.
10. Effective upon issuance of Supplemental Permit No. 2007-376-SP, the permittee (s) shall submit a 39(i) certification and supporting documentation to demonstrate compliance with Section 39(i) of the Act within 30 days of any of the following events:
 - a. The owner or officer of the owner, or operator, or any employee who has control over operating decisions regarding the facility has violated federal, State, or local laws, regulations, standards, or ordinances in the operation of waste management facilities or sites; or
 - b. The owner or operator or officer of the owner, or operator, or any employee who has control over operating decisions regarding the facility has been convicted in this or another State of any crime which is a felony under the laws of this State, or conviction of a felony in a federal court; or
 - c. The owner or operator or officer of the owner, or operator, or any employee who has control over operating decisions regarding this facility has committed an act of gross carelessness or incompetence in handling, storing, processing, transporting, or disposing of waste.
 - d. A new person is associated with the owner or operator who can sign the application form(s) or who has control over operating decisions regarding the facility, such as corporate officer or a delegated employee.

Except as modified in the above documents, the site shall be maintained in accordance with the terms and conditions of Permit No. 1985-7-OP, dated March 18, 1985, and with other permits issued for this site.

The original and two (2) copies of all certifications, logs, reports, and groundwater monitoring chemical analysis forms which are required to be submitted to the Illinois EPA by the permittee should be mailed to the following address:

Illinois Environmental Protection Agency
Permit Section
Bureau of Land -- #33
1021 North Grand Avenue East
Post Office Box 19276
Springfield, Illinois 62794-9276

The applicant may appeal this final decision to the Illinois Pollution Control Board pursuant to Section 40 of the Act by filing a petition for a hearing within 35 days after the date of issuance of the final decision. However, the 35-day period may be extended for a period of time not to exceed 90 days by written notice from the applicant and the Illinois EPA within the initial 35-day appeal period. If the owner or operator wishes to receive a 90-day extension, a written request that includes a statement of the date the final decision was received, along with a copy of this decision, must be sent to the Illinois EPA as soon as possible.

For information regarding the request for an extension, please contact:

Illinois Environmental Protection Agency
Division of Legal Counsel
1021 North Grand Avenue East
Post Office Box 19276
Springfield, IL 62794-9276
217/782-5544

For information regarding the filing of an appeal, please contact:

Illinois Pollution Control Board, Clerk
State of Illinois Center
100 West Randolph, Suite 11-500
Chicago, IL 60601
312/814-3620

Work required by this permit, your application or the regulations may also be subject to other laws governing professional services, such as the Illinois Professional Land Surveyor Act of 1989, the Professional Engineering Practice Act of 1989, the Professional Geologist Licensing Act, and the Structural Engineering Licensing Act of 1989. This permit does not relieve anyone from compliance with these laws and the regulations adopted pursuant to these laws. All work that falls within the scope and definitions of these laws must be performed in compliance with them. The Illinois EPA may refer any discovered violation of these laws to the appropriate regulating authority.

Sincerely,



Stephen F. Nightingale, P.E.
Manager, Permit Section
Bureau of Land


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Attachment: Standard Conditions
Attachment A: Monitoring Program
Attachment B: Statistical Methods

cc: Steven E. Davis, P.E., Conestoga-Rovers and Associates
Vermilion County Health Department

STANDARD CONDITIONS FOR CONSTRUCTION/DEVELOPMENT PERMITS
ISSUED BY THE ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
BUREAU OF LAND

August 22, 2001

The Illinois Environmental Protection Act (Illinois Revised Statutes, Chapter 111-1/2, Section 1039) grants the Environmental Protection Agency authority to impose conditions on permits which it issues.

These standard conditions shall apply to all permits which the Agency issues for construction or development projects which require permits under the Bureau of Land. Special conditions may also be imposed in addition to these standard conditions.

1. Unless this permit has been extended or it has been voided by a newly issued permit, this permit will expire two years after date of issuance unless construction or development on this project has started on or prior to that date.
2. The construction or development of facilities covered by this permit shall be done in compliance with applicable provisions of Federal laws and regulations, the Illinois Environmental Protection Act, and Rules and Regulations adopted by the Illinois Pollution Control Board.
3. There shall be no deviations from the approved plans and specifications unless a written request for modification of the project, along with plans and specifications as required, shall have been submitted to the Agency and a supplemental written permit issued.
4. The permittee shall allow any agent duly authorized by the Agency upon the presentation of credentials:
 - a. to enter at reasonable times the permittee's premises where actual or potential effluent, emissions or noise sources are located or where any activity is to be conducted pursuant to this permit.
 - b. to have access to and copy at reasonable times any records required to be kept under the terms and conditions of this permit.
 - c. to inspect at reasonable times, including during any hours of operation of equipment constructed or operated under this permit, such equipment or monitoring methodology or equipment required to be kept, used, operated, calibrated and maintained under this permit.
 - d. to obtain and remove at reasonable times samples of any discharge or emission of pollutants.

- e. to enter at reasonable times and utilize any photographic, recording, testing, monitoring or other equipment for the purpose of preserving, testing, monitoring, or recording any activity, discharge, or emission authorized by this permit.
5. The issuance of this permit:
- a. shall not be considered as in any manner affecting the title of the premises upon which the permitted facilities are to be located;
 - b. does not release the permittee from any liability for damage to person or property caused by or resulting from the construction, maintenance, or operation of the proposed facilities;
 - c. does not release the permittee from compliance with other applicable statutes and regulations of the United States, of the State of Illinois, or with applicable local laws, ordinances and regulations;
 - d. does not take into consideration or attest to the structural stability of any units or parts of the project;
 - e. in no manner implies or suggests that the Agency (or its officers, agents or employees) assumes any liability, directly or indirectly, for any loss due to damage, installation, maintenance, or operation of the proposed equipment or facility.
6. Unless a joint construction/operation permit has been issued, a permit for operating shall be obtained from the Agency before the facility or equipment covered by this permit is placed into operation.
7. These standard conditions shall prevail unless modified by special conditions.
8. The Agency may file a complaint with the Board for modification, suspension or revocation of a permit:
- a. upon discovery that the permit application contained misrepresentations, misinformation or false statements or that all relevant facts were not disclosed; or
 - b. upon finding that any standard or special conditions have been violated; or
 - c. upon any violation of the Environmental Protection Act or any Rule or Regulation effective there under as a result of the construction or development authorized by this permit.

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ATTACHMENT A

Monitoring Program

To identify any releases from the facility and demonstrate compliance with the applicable groundwater quality standards, the groundwater monitoring program is approved as follows:

1. The monitoring program must be capable of determining background groundwater quality hydraulically upgradient of and unaffected by the units and to detect any discharge of contaminants from any part of a potential source of discharge from the units. The Illinois EPA reserves the right to require installation of additional monitoring wells as may be necessary to satisfy the requirements of this permit.
2. The groundwater monitoring program shall include consistent sampling and analysis procedures to assure that monitoring results will provide a reliable indication of groundwater quality in the zone being monitored. As approved in Log No. 2004-318, the operator shall perform low-flow sampling procedures at all wells at the facility.
3. The permittee shall sample all groundwater monitoring points for all potential sources of contamination on a quarterly basis in accordance with Condition No. 21 including a minimum of three (3) years after certification of closure.
4. The permittee shall use the methods used and approved in Supplemental Permit Application Log No. 2013-382 to statistically evaluate the groundwater monitoring data. Specifically, a prediction limit at 99% confidence shall be calculated, using a minimum of four consecutive quarters of data.
5. For each sampling event, using the methods in Condition No. 4 above, the permittee must determine if a significant change in groundwater quality has occurred by: Comparing sample results from each downgradient well to the upgradient well's background data established during the first year of monitoring. This comparison must evaluate each parameter for each well.
6. The permittee shall conclude that a significant change in groundwater quality has occurred if the results of the evaluation in Condition No. 5 above indicate that the value for any parameter exceeds:
 - a. The intrawell background value established for that parameter at the 99% confidence level (listed in Attachment B); or

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- b. The Class IV groundwater quality standards listed in Subpart D of 35 Ill. Adm. Code 620 Standards (this class applies until an adequate demonstration has been made by the Permittee that another class applies pursuant to Subpart B of 35 Ill. Adm. Code 620 Standards); or
 - c. For organic parameters two (2) times the Practical Quantitation Limit (PQL) for a single parameter or any two (2) or more parameters exceed the PQL in the same well.
7. Within forty-five (45) days of the original sample date, the permittee may resample and test the determination made in Condition No. 6 above. If the evaluation of the resample result confirms the determination made in Condition No. 6 above, the permittee must conclude that a significant change in groundwater quality has occurred.
8. In the event a significant change in groundwater quality has occurred or has been confirmed, the permittee shall:
- a. Notify the Illinois EPA, Division of Land Pollution Control, Permit Section, in writing, within ten (10) days of the change in groundwater quality, identifying each well and each parameter;
 - b. Submit an assessment monitoring plan within thirty (30) days of the significant change as determined in Condition No. 6 or Condition No. 7 above in the form of a supplemental permit application. The assessment monitoring plan shall include appropriate methods for determining the source of the increase, the potential threat to human health and the environment and the concentration and extent of the contaminants if any. The assessment monitoring plan shall, at a minimum, include expanded sampling requirements for the affected well(s) and shall be implemented within thirty (30) days of approval from the Illinois EPA.
 - c. Submit assessment report, based on and including the data and information generated from the completion of Condition No. 8b above to the Illinois EPA within ninety (90) days of approval of the assessment monitoring plan.
 - d. Propose a corrective action plan if assessment monitoring indicates that the facility has impacted groundwater. The corrective action plan shall be submitted within thirty (30) days of approval of the assessment report required by Condition 8c above in the form of a supplemental permit application and include appropriate response action to address any impact of the facility. The plan shall be implemented within thirty (30) days of Illinois EPA approval.

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- d. Propose a corrective action plan if assessment monitoring indicates that the facility has impacted groundwater. The corrective action plan shall be submitted within thirty (30) days of approval of the assessment report required by Condition 8c above in the form of a supplemental permit application and include appropriate response action to address any impact of the facility. The plan shall be implemented within thirty (30) days of Illinois EPA approval.
9. All monitoring wells shall be constructed in a manner that maintains the integrity of the bore hole and prevents contamination of the samples and groundwater. The casing material shall be inert so as not to affect the water sample.
10. A padlocked protective cover must be installed over the portion of the well casing extending above the ground surface to protect against damage.
11. Wells shall be easily visible and identified with the Illinois EPA monitoring point designation.
12. Should any well become consistently dry or unserviceable, a replacement well shall be provided within ten (10) feet of the existing well. This well shall monitor the same zone as the existing well and constructed in accordance with the current Illinois EPA groundwater monitor well construction standards at the time that the wells are replaced. A replacement well which is more than ten (10) feet from the existing well or which does not monitor the same geologic zone must be approved via a Supplemental Permit and designated as a new well.
13. Within sixty (60) days of installation of any groundwater and/or leachate monitoring well, boring logs compiled by a qualified geologist, well development data and as-built diagrams shall be submitted to the Illinois EPA utilizing the enclosed "Well Completion Report" form. For each well installed pursuant to this permit one form must be completed. As-built diagrams, for each monitoring point installed, shall include the horizontal location to the nearest 0.1 foot (grid coordinates), the type and inner diameter of casing material used, type and length of screen packing material used, type and length of seals used, type of backfill used, finishing details, groundwater levels, elevation of stick-up (top of casing), ground surface elevation, bottom elevation, interval screened and screen slot size and depth. All elevations or levels are to be measured and reported to the nearest 0.01 foot MSL.
14. All borings/wells not used as monitoring points shall be backfilled in accordance with the attached Illinois EPA monitor well plugging procedures.

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15. The Illinois EPA shall be notified in writing at least fifteen (15) days prior to the installation of all new and replacement monitoring wells. All newly required monitoring wells should be installed within sixty (60) days of the issuance of this permit.
16. Surveyed elevation of stick-up is to be reported when the well is installed (with as-built diagrams) and every two (2) years, or whenever the elevation changes.
17. The following monitoring points are to be used in the groundwater monitoring program for this facility. These monitoring points supersede all previously required monitoring points and represent the entire list of monitoring points now required for this facility.

<u>Applicant Designation</u>	<u>Former Ill EPA Designation</u>	<u>New Ill EPA Designation</u>
*G-19S	*G-19S	----
G-30D	G-30D	P01S
*G-30DA	*G-31D	----
G-14S	G-14S	G01S
G-14D	G-14D	G01D
G34SR	G45S	G02S
#G47	----	#G03S
*G-32S	*G-32S	----
*G-41S	*G-41S	----
*G-41D	*G-41D	----
*G-42S	*G-42S	----
*R42D	*R42D	----
G43	G43D	G04S
G44	G44D	G05S

+ represents upgradient monitoring point(s)

represents monitor point(s) added to the monitoring program

* represents monitor point(s) deleted from the monitoring program

18. The concentration or values for the parameters contained in Lists 1, 2, and 3 shall be determined for samples collected from the groundwater monitoring points and reported according to the schedule in Condition No. 21 and evaluated in accordance with Condition No. 5.

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LIST 1

FIELD PARAMETERS

STORET NUMBER

*Bottom of Well Elevation (ft. ref MSL)	72020
Depth to Water (ft. below land surface)	72019
Depth to Water (ft. from measuring point)	72109
Elevation of Groundwater Surface (ft. ref MSL)	71993
pH (units, unfiltered)	00400
Specific Conductance (umhos/cm, unfiltered)	00094
Temperature of Water Sample (deg F)	00011

(* = Reported Annually)

LIST 2

ROUTINE INDICATOR PARAMETERS

STORET NUMBER PQL (ug/L unless
 otherwise noted)

FILTERED

Ammonia as (N) Diss (mg/L)	00608	--- (mg/L)
Arsenic As, Diss (ug/L)	01000	---
Cadmium Cd, Diss (ug/L)	01025	---
Chloride Cl, Diss (mg/L)	00941	--- (mg/L)
Iron Fe, Diss (ug/L)	01046	---
Lead Pb, Diss (ug/L)	01049	---
Manganese Mn, Diss (ug/L)	01056	---

UNFILTERED

Mercury Hg, Diss (ug/L)	71890	---
Sulfate SO ₄ , Diss (mg/L)	00946	--- (mg/L)
Total Dissolved Solids (TDS, mg/L)	70300	--- (mg/L)
Cyanide CN, Total (mg/L)	00720	--- (mg/L)
Total Organic Carbon (TOC) (mg/L)	00680	---
Total Organic Halogens (TOX) (ug/L)	78115	---
Phenol (ug/L)	32730	---

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LIST 3 -- INORGANIC ANNUAL PARAMETERS [SOURCE: 35 Ill. Adm. Code 620.410]

INORGANIC PARAMETERS

Constituent (Unfiltered, ug/L unless otherwise noted)	<u>STORET</u>	PQL (ug/L unless otherwise noted)
Antimony	01097	---
Arsenic	01002	5.0
Barium	01007	20.0
Beryllium	01012	---
Boron	01022	40
Cadmium	01027	2.0
Chloride (mg/L)	00940	1.0 (mg/L)
Chromium	01034	10.0
Cobalt	01037	50.0
Copper	01042	25
Cyanide (mg/L)	00720	0.1 (mg/L)
Fluoride (mg/L)	00951	0.1 (mg/L)
Iron	01045	40.0
Lead	01051	5.0
Manganese	01055	15.0
Mercury	71900	0.2
Nickel	01067	40.0
Nitrate as N (mg/L)	00620	1.0 (mg/L)
Perchlorate	61209	--
Selenium	01147	5.0
Silver	01077	10.0
Sulfate (mg/L)	00945	1.0 (mg/L)
Thallium	01059	---
Total Dissolved Solids	70300	10.0 (mg/L)
Vanadium	01087	--
Zinc	01092	20.0

*Denotes a carcinogen

+Practical Quantitation Limits (PQLs) as based on GC/MS Methods listed in 35 IAC Subtitle G
Part 724 Appendix I

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19. All monitoring points shall be maintained in accordance with the approved permit application such that the required samples and measurements may be obtained.
20. Sampling should commence concurrently with issuance of the permit. Statistical evaluations should be performed for all parameters that have an established background. The established background should be taken over one year and include at least 4 sampling events. The parameter list included with this permit supersedes any previous list. The first quarterly statistical evaluations shall be performed on samples taken during the months of July-August, 1995 and the results submitted to the Illinois EPA by October 15, 1995.
21. The schedule for sample collection and submission of quarterly monitoring results is as follows:

<u>Sampling Quarter</u>	<u>Sampling Due</u>	<u>Report Due Date</u>
Jan-Feb (1st)	List 1 and 2	April 15
April-May (2nd)	List 1, 2, and 3	July 15
July-Aug (3rd)	List 1 and 2	October 15
Oct-Nov (4th)	List 1 and 2	January 15

- 1 - Field Parameters
- 2 - Indicator Parameters
- 3 - Annual Parameters

P01S (formerly G20D) shall be monitored quarterly for groundwater elevation only.

22. Annually, the operator shall prepare an assessment of the monitoring program which shall include an evaluation of the groundwater flow direction and the hydraulic gradients at the facility. This assessment shall be submitted with the monitoring results due on July 15, 1995.
23. Information required by Conditions 18 and 21 in Attachment A must be submitted in an electronic format. The information is to be submitted, as fixed-width text files formatted as found at www.epa.state.il.us/land/regulatory-programs/permits-and-management/index.html.
24. Supplemental Permit Application Log No. 2006-290 approved the removal of all organic parameters from the 35 IAC 620 parameter list. However, the facility must monitor all

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groundwater monitoring wells for all of the 35 Ill. Adm. Code 620 parameters, including organic parameters, before post-closure certification can be granted to the facility.

25. As approved in Application Log No. 2013-382, the operator shall perform the following activities:

- Install a new downgradient well at the boring location containing the temporarily well currently referred to as G47, and provide the boring log and well completion report to the Illinois EPA.
- Establish intrawell values for all List 1, List 2, and List 3 parameters at new well G03S (formerly G47); for TOX at wells G02S (formerly G45S), G04S (formerly G43D), and G05S (formerly G44D); and for the inorganic List 3 parameters at all wells. Intrawell values shall be calculated using a minimum of four consecutive quarters of data, beginning with the 4th quarter 2014, and the statistical methods referenced in Supplemental Permit Application Log No. 2013-382.
- Remove wells P-1S, G19S, G31D, G32S, G41D, G42S, G42DR, and G46S from the monitoring program and properly seal each hole. For only those wells that are drilled through the waste and screened in native material, they shall be overdrilled and have the casing removed. All exploratory borings drilled to the east of the landfill that were used to determine an upgradient locations should be properly abandoned as well. All documentation demonstrating abandonment of the wells shall be submitted to the Illinois EPA, the Illinois Department of Public Health, and the Vermillion County Health Department.
- Conduct at least one leachate sampling event from the leachate monitoring point/manhole for characterization and comparison to historical data from former wells screened in waste.
- Construct a facility map that shows the current groundwater monitoring network, as well as the new designations for each well.

All of the information listed above shall be submitted to the Illinois EPA in the form of a Supplemental Permit Application, no later than October 31, 2015.

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ATTACHMENT B

Intrawell Values

Parameter	G01D (G14D)	G01S (G14S)	G02S (G45S)	G03S (G47)	G04S (G43D)	G05S (G44D)
pH	5.67 - 8.295	4.029 - 9.931	5.817 - 7.728	*****	6.004 - 7.966	4.701 - 9.288
Specific Conductance	1800	1917	2977	*****	3854	1524
Arsenic(d)	47.96	48.98	29.03	*****	26.25	5
Cadmium(d)	2.5	2.5	2.5	*****	5	5
TOC	12.38	4.187	6.18	*****	25.55	10.74
Chloride(d)	27.78	14.32	59.43	*****	446	78.21
Cyanide(t)	0.1	0.1	0.1	*****	0.1	0.1
TOX	30	30	*****	*****	*****	*****
Iron(d)	197	194.4	9680	*****	6905	2223
Lead(d)	1.5	1.5	1.5	*****	3	3
Manganese(d)	208	174.1	1102	*****	6548	6728
Mercury(d)	0.13	0.14	0.11	*****	0.2	0.2
ammonia(d)	0.1446	0.25	1.508	*****	5.191	3.093
Phenols(t)	597.6	2323	3643	*****	2178	2763
TDS	810.6	7990	1210	*****	1236	1144
Sulfate(d)	207.7	210.8	338.9	*****	720.3	206



021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276



7012 0470 0001 2976 3793

NIXIE 481986048-IN 01/05/15

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RACER Properties, LLC
Attn: Mr. Robert Hare, P.E.
2930 Ecorse Road
Ypsilanti, MI 48198

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