SOIL CONTAINING PCB CLEANUP COMPLETION SUMMARY REPORT

FORMER GRAND RAPIDS METAL PLANT
300 36th STREET SW
WYOMING, MICHIGAN

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MAY 2013
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1.0 INTRODUCTION /APPLICABILITY

Conestoga-Rovers & Associates (CRA) has prepared this Soil Containing Polychlorinated Biphenyl (PCB) Cleanup Completion Summary Report (Report) on behalf of Revitalizing Auto Communities Environmental Response (RACER) Trust for the former Grand Rapids Metal Plant property located at 300 36th Street SW in Wyoming, Michigan (Site). The Site location is presented on Figure 1.1. A Site Plan is presented on Figure 1.2.

A Self-Implementing Plan (SIP) was prepared for PCB Area Nos. 1 and 2 and submitted to the United States Environmental Protection Agency (U.S. EPA) – Region 5, the Michigan Department of Environmental Quality (MDEQ), and the Kent County Health Department (KCHD) on June 7, 2012 in accordance with the procedures set forth in 40 Code of Federal Regulations (CFR) 761.61(a) of the Toxic Substances Control Act (TSCA) regarding the characterization and remediation of polychlorinated biphenyl (PCB) remediation waste. U.S. EPA conditionally approved the SIP in correspondence dated August 6, 2012. This Report has been prepared for submittal to the United States Environmental Protection Agency (U.S. EPA) – Region 5 in accordance with Condition No. 3 specified in U.S. EPA's August 6, 2012 approval of the SIP. A copy of the approved SIP is presented in Appendix A.

General Motors Corporation (GMC) initiated automotive manufacturing operations at the Site in 1936. Operations ceased at the Site on June 30, 2010. GMC filed for bankruptcy under Chapter 11 of the United States Bankruptcy Code on June 1, 2009. On July 10, 2009, pursuant to a bankruptcy court order, Motors Liquidation Company (MLC) retained ownership of the Site, and on October 20, 2010 entered into a settlement agreement with federal and state governmental authorities regarding MLC's environmental obligations at its remaining properties. According to the terms of the settlement agreement, RACER Trust became effective March 31, 2011 and interests in the Site were transferred to RACER Trust at that time to conduct, manage, and fund cleanup at the 89 sites formerly owned by MLC, including the Site. The Site was sold to Thunder Ventures, who then transferred the property to the City of Wyoming Brownfield Redevelopment Authority (WBRA) on June 28, 2011; however, RACER Trust retains certain responsibilities related to subsurface contamination associated with historical operations at the Site by GMC.

In 2012, the Site underwent redevelopment activities including decommissioning, demolition, and property re-grading by contractors on behalf of Thunder Ventures. The majority of the historical structures at the Site were decommissioned and demolished, and the Site is currently being marketed for future redevelopment.

Based on discussions with representatives of the WBRA, PCB Area Nos. 1 and 2 may be utilized in a manner in the future that would meet the definition of a High Occupancy Area under 40 CFR 761. The scope of the June 7, 2012 SIP was limited to specific subsurface areas of the Site only, identified as PCB Area Nos. 1 and 2. Additional areas where PCBs were detected in soil above the High Occupancy Area Cleanup Level of 1 part per million (ppm)/1 milligram per kilogram (mg/kg) for bulk remediation waste (without further conditions) are present at the Site outside the former Main Manufacturing Building footprint. These areas were not addressed in the SIP and will be further evaluated and addressed, as applicable, in accordance with 40 CFR 761.61 at a later date.

2.0 SITE CHARACTERIZATION

Site characterization was completed prior to removal activities as presented in the approved SIP. A copy of the SIP is presented in Appendix A.

3.0 NOTIFICATION AND CERTIFICATION

The SIP was filed with the U.S. EPA, MDEQ, and KCHD in accordance with 40 CFR 761(a)(3)(i) on June 7, 2012, which was greater than 30 days prior to the cleanup initiation date of August 22, 2012.

4.0 CLEANUP LEVELS

As discussed in Section 1.0 and in the SIP, the cleanup level utilized for this work was the High Occupancy Area Cleanup Level of 1 ppm/1 mg/kg for bulk remediation waste (without further conditions) in 40 CFR 761(a)(4)(i)(A).

5.0 SITE CLEANUP

The bulk PCB remediation waste removal activities were conducted on August 22, 2012. Additional details on the specific activities performed are presented below.

5.1 SOIL EXCAVATION ACTIVITIES

Prior to mobilization, the areas in which removal activities were required were identified by locating previously surveyed boring locations. The prior boring locations were utilized to mark the extents of the anticipated excavation boundaries.

Site preparation activities included constructing haul roads for waste transportation vehicles, construction of a temporary decontamination pad, and demarcation of excavation areas within their current demolition work areas.

Soils containing concentrations of PCBs greater than 1 ppm were excavated using a hydraulic excavator. Figures 5.1 and 5.2 show the final excavation extents of PCB Area No. 1 and PCB Area No. 2, respectively. Excavated soils were transferred directly from the excavation into haul trucks for transportation to the landfill. The trucks were equipped with covers to prevent the loss of any soils during transportation.

A total of approximately 45 tons or 30 cubic yards (cy) (based on a conversion of 1.5 tons per cy) of soil containing PCBs were removed from PCB Area No. 1. A total of approximately 121.5 tons or 81 cy of soil containing PCBs were removed from PCB Area No. 2. The soil removed from PCB Area No. 2 also included the soil pile adjacent to the excavation area that was generated by on-Site demolition activities. All soils were transported to and disposed of at Waste Management, Inc.'s Autumn Hills Landfill in Zeeland, Michigan, in accordance with 40 CFR 761.61(a)(5).

5.2 SOIL EXCAVATION BACKFILLING ACTIVITIES

Upon receipt of the analytical results for the verification soil samples indicating that PCBs were not detected at a concentration above 1 ppm (see Section 6.0), the excavations were backfilled. Crushed concrete fill generated on-Site during the demolition activities was utilized to backfill each excavation cavity. All final grading and compaction of fill materials was completed as part of the decommissioning and demolition scope of work.

5.3 DECONTAMINATION

Decontamination was completed in accordance with the self-implementing procedures described in 40 CFR 761.79(c)(2). Equipment which contacted PCB-impacted material, including the excavator and non-disposable sampling equipment, was decontaminated with a high-pressure steam cleaner and a detergent solution. Decontamination materials were disposed as described in Section 5.4.

5.4 TRANSPORTATION AND OFF-SITE DISPOSAL

Transportation and disposal were required for the waste stream in accordance with 40 CFR 761.61(a)(5)(v)(A) for bulk PCB remediation waste containing PCBs less than 50 ppm. A minimum 15-day notification was provided to the disposal facility prior to the first shipment of the waste.

Excavated materials were direct-loaded into trucks. Water generated during decontamination activities was left in the decontamination pad to allow for complete evaporation. The decontamination pad materials were stored in a 55-gallon drum that contained soil cuttings from the SIP investigation sampling. The soils, decontamination pad materials, and personal protective equipment (PPE) generated during implementation of the cleanup were disposed of at Autumn Hills Landfill in Zeeland, Michigan.

The waste manifests for the soils and other materials were prepared in accordance with 40 CFR 761 Subpart K *PCB Waste Disposal Records and Reports*. A copy of the disposal documentation is presented in Appendix B.

6.0 VERIFICATION SAMPLING

Verification sampling was conducted consistent with 40 CFR 761 Subpart O "Sampling to Verify Completion of Self-Implementing Cleanup and On-Site Disposal of Bulk PCB Remediation Waste and Porous Surfaces." Table 6.1 presents a sample key for the final verification samples.

After completion of excavation activities, verification samples were collected at five-foot intervals horizontally and vertically. The soils were composited in the field and sent to the laboratory for analysis. Laboratory analytical results from the sampling after excavation activities indicated that PCBs at concentrations above 1 ppm were no longer present in any of the excavation floor and sidewalls.

Figures 6.1 and 6.2 present the verification sample locations for PCB Area No. 1 and PCB Area No. 2, respectively. Table 6.2 presents the analytical results for the final verification samples. The complete data deliverables provided by the laboratories that performed the analysis of the samples during the PCB cleanup activities are available upon request.

7.0 CAP REQUIREMENTS

A cap was not utilized as part of this cleanup.

8.0 DEED RESTRICTIONS

Deed restrictions were not utilized as part of this cleanup.

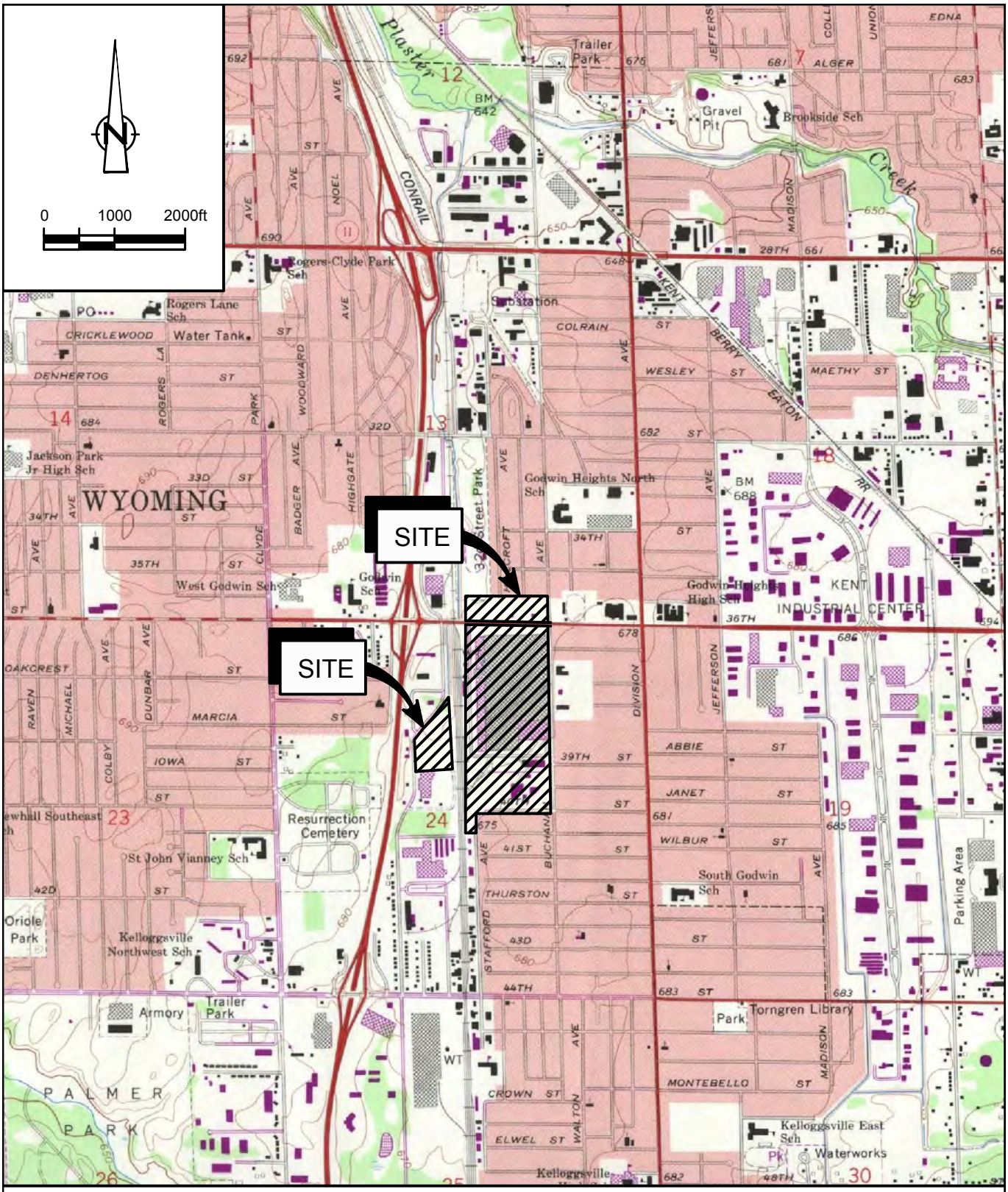
9.0 RECORDKEEPING

During completion of the cleanup activities, a logbook was maintained to document all activities completed on Site including weather, personnel participating in the cleanup activities, cleanup activities conducted, and other relevant information.

As identified in the SIP, all sampling plans, sample collection procedures, sample preparation procedures, extraction procedures, and instrument/chemical analysis procedures used to assess or characterize the PCB contamination related to the investigation and cleanup activities will be maintained in the following location and accessible for inspection by U.S. EPA:

- Conestoga-Rovers & Associates, Inc.
  Attn: Jennifer Quigley, P.E.
  200 West Allegan Street, Suite 300
  Plainwell, Michigan 49080-1397

Records will be kept consistent with 40 CFR 761.61(a)(9).



SOURCE: USGS QUADRANGLE MAP
GRAND RAPIDS - EAST - MICHIGAN

figure 1.1

SITE LOCATION
FORMER GRAND RAPIDS METAL PLANT
Wyoming, Michigan

017360-T05(030)GN-DE001 FEB 12/2013

RESIDENTIAL

COMMERCIAL

COMMERCIAL/INDUSTRIAL

COMMERCIAL/RESIDENTIAL

RESIDENTIAL

RESIDENTIAL

BUCHANAN STREET

367TH STREET

407TH STREET

STAFFORD

CLAY AVE.

CLAY AVE

PCB AREA NO. 1

PCB AREA NO. 2

FORMER MAIN MANUFACTURING BUILDING

FORMER RACK MAKE-UP BUILDING

FORMER POWER HOUSE

FORMER USED OIL AST

FORMER PRESS STAGING BUILDING

FORMER WWTP

FORMER BALER HOUSE

PUMP HOUSE

500,000 GALLON WATER STORAGE TANK

PRIMARY SWITCH HOUSE

GUARD HOUSE

TRUCK SCALE PIT

STORM SEWER PUMP HOUSE

METAL STORAGE SHED

STORM WATER RETENTION BASIN

EMPLOYEE ENTRANCE BUILDING

0 100 250ft

LEGEND

APPROXIMATE PROPERTY BOUNDARY

AREA OF PCB IMPACTED SOIL EXCAVATION

FENCE

RAILROAD

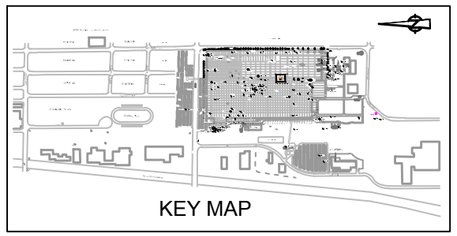
COLE DRAIN

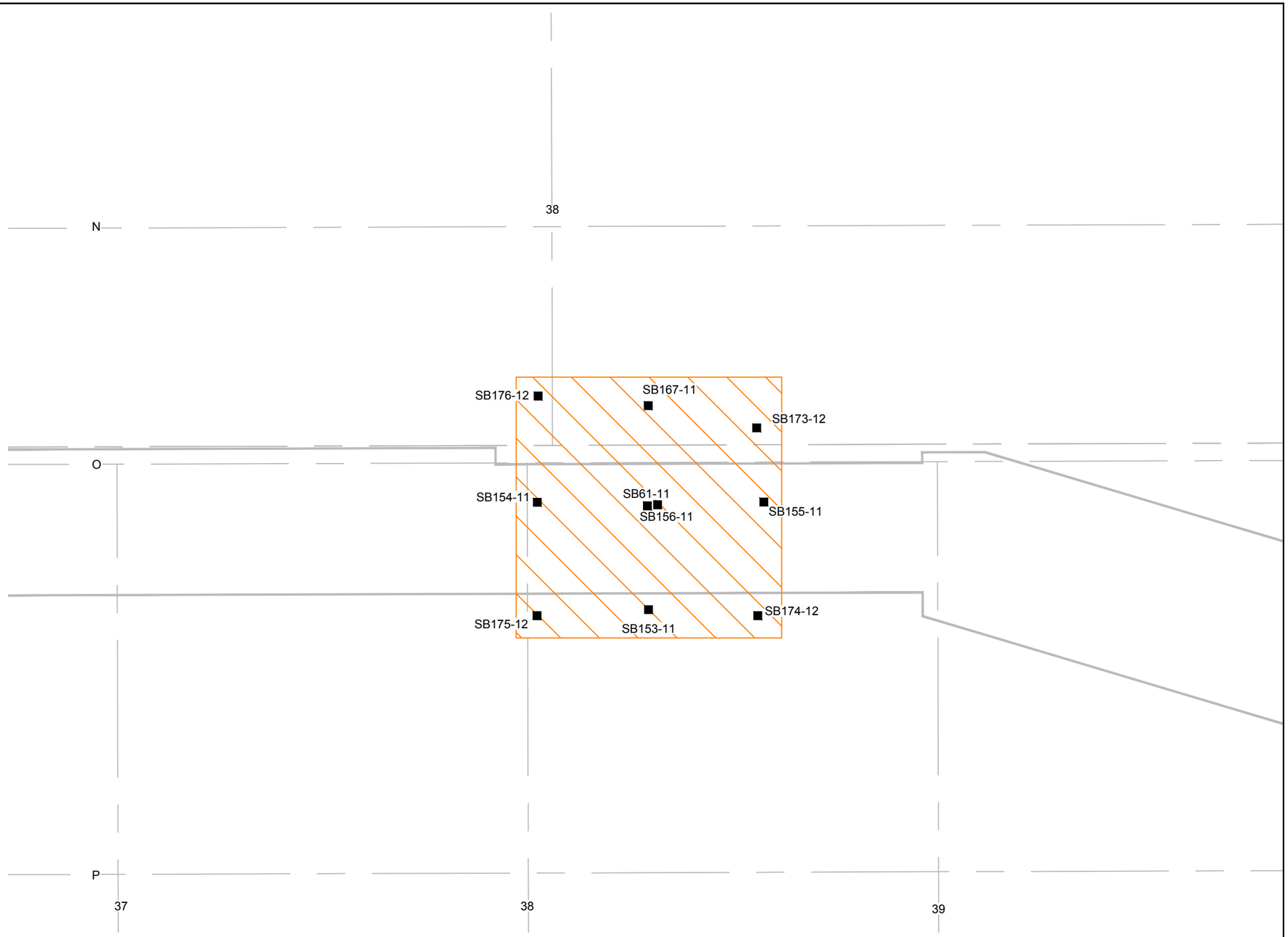
figure 1.2

SITE PLAN
FORMER GRAND RAPIDS METAL PLANT
Wyoming, Michigan

017360-T05(030)GN-DE002 FEB 12/2013

0 5 10ft





LEGEND

■ SB156-11 SOIL BORING LOCATION

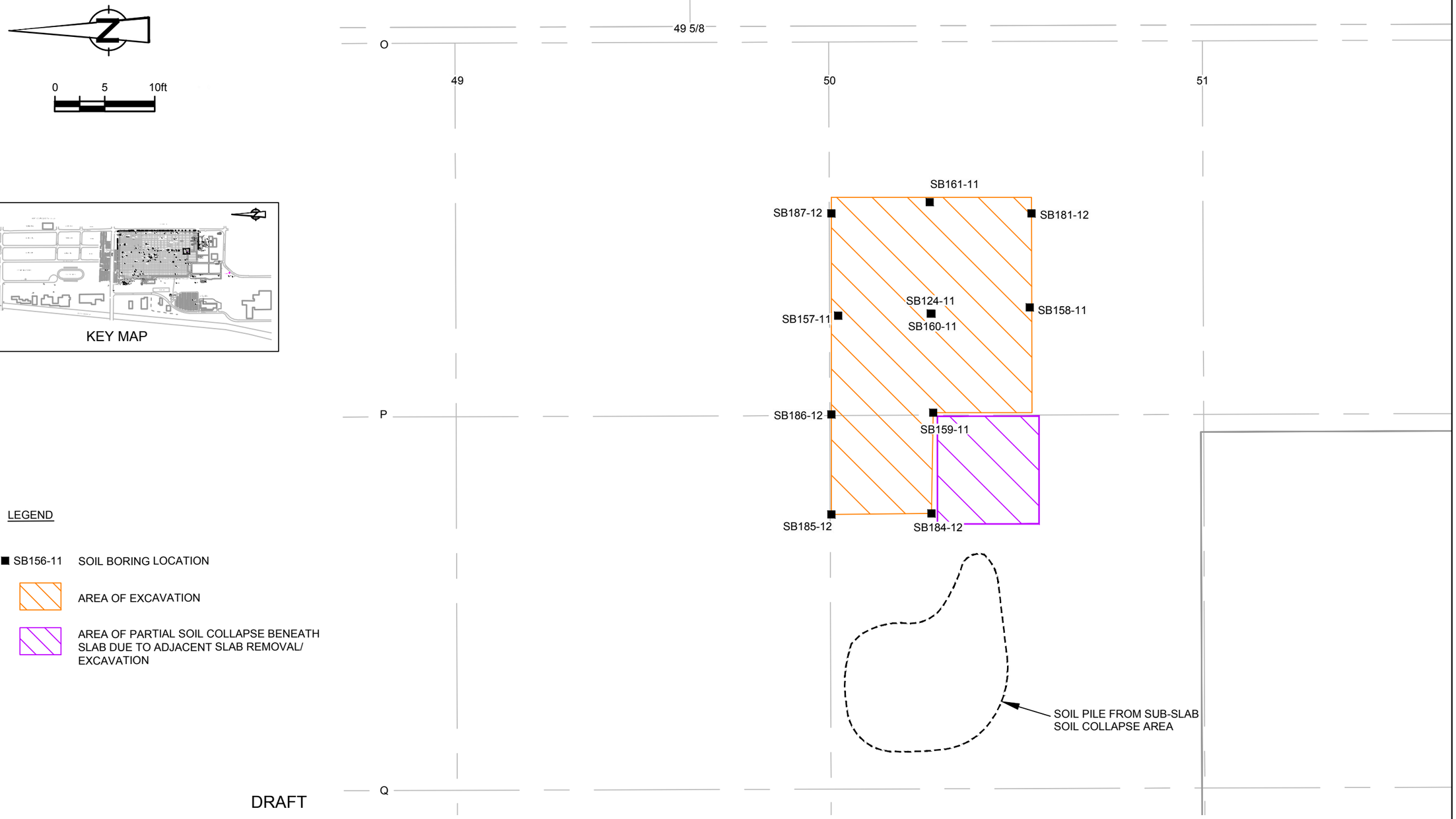
AREA OF EXCAVATION

DRAFT

figure 5.1

PCB AREA NO. 1 - EXCAVATION AREA
FORMER GRAND RAPIDS METAL PLANT
Wyoming, Michigan

017360-T05(030)GN-DE003 APR 04/2013



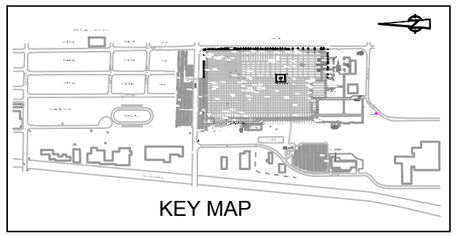
DRAFT

figure 5.2

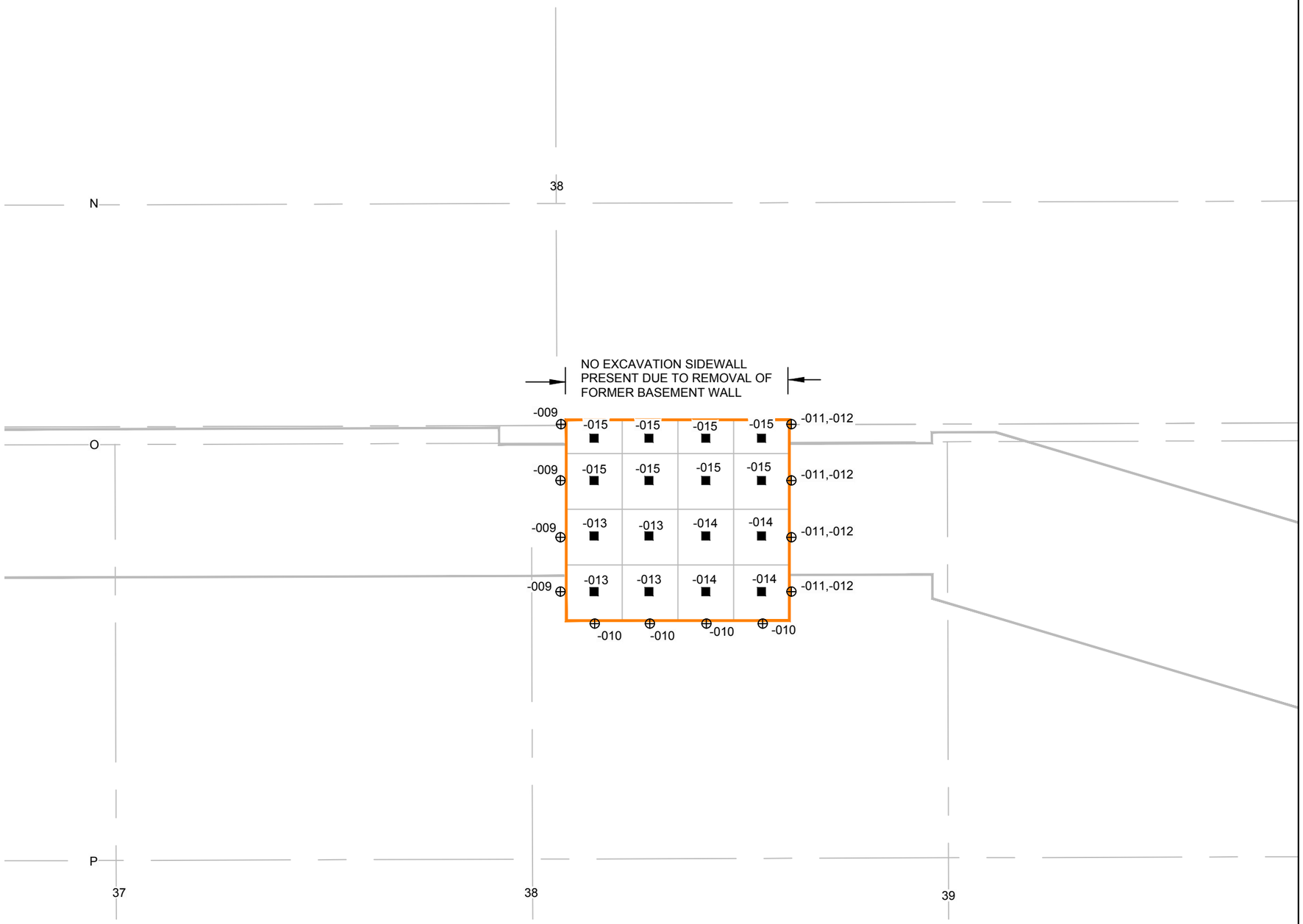
PCB AREA NO. 2 - EXCAVATION AREA
FORMER GRAND RAPIDS METAL PLANT
Wyoming, Michigan

017360-T05(030)GN-DE004 APR 04/2013

0 5 10ft



KEY MAP



LEGEND

LIMITS OF EXCAVATION

■ COMPOSITE VERIFICATION SAMPLE GRAB LOCATION - FLOOR

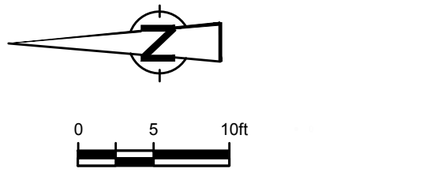
⊕ COMPOSITE VERIFICATION SAMPLE GRAB LOCATION - SIDEWALL

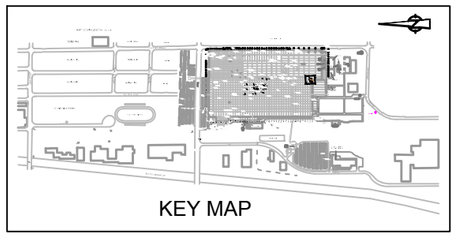
NOTE: "-009" DENOTES SUFFIX OF SAMPLE ID FOR CORRESPONDING COMPOSITE VERIFICATION SAMPLE PRESENTED IN TABLE 2.1.

DRAFT

figure 6.1

PCB AREA NO. 1 - VERIFICATION SAMPLE LOCATIONS
FORMER GRAND RAPIDS METAL PLANT
Wyoming, Michigan





LEGEND

LIMIT OF EXCAVATION

■ COMPOSITE VERIFICATION SAMPLE GRAB LOCATION - FLOOR

⊕ COMPOSITE VERIFICATION SAMPLE GRAB LOCATION - SIDEWALL

△ EX-SITU COMPOSITE SOIL SAMPLE GRAB LOCATION - SOIL PILE, Q-50

NOTE: "-009" DENOTES SUFFIX OF SAMPLE ID FOR CORRESPONDING COMPOSITE VERIFICATION SAMPLE PRESENTED IN TABLE 2.1.

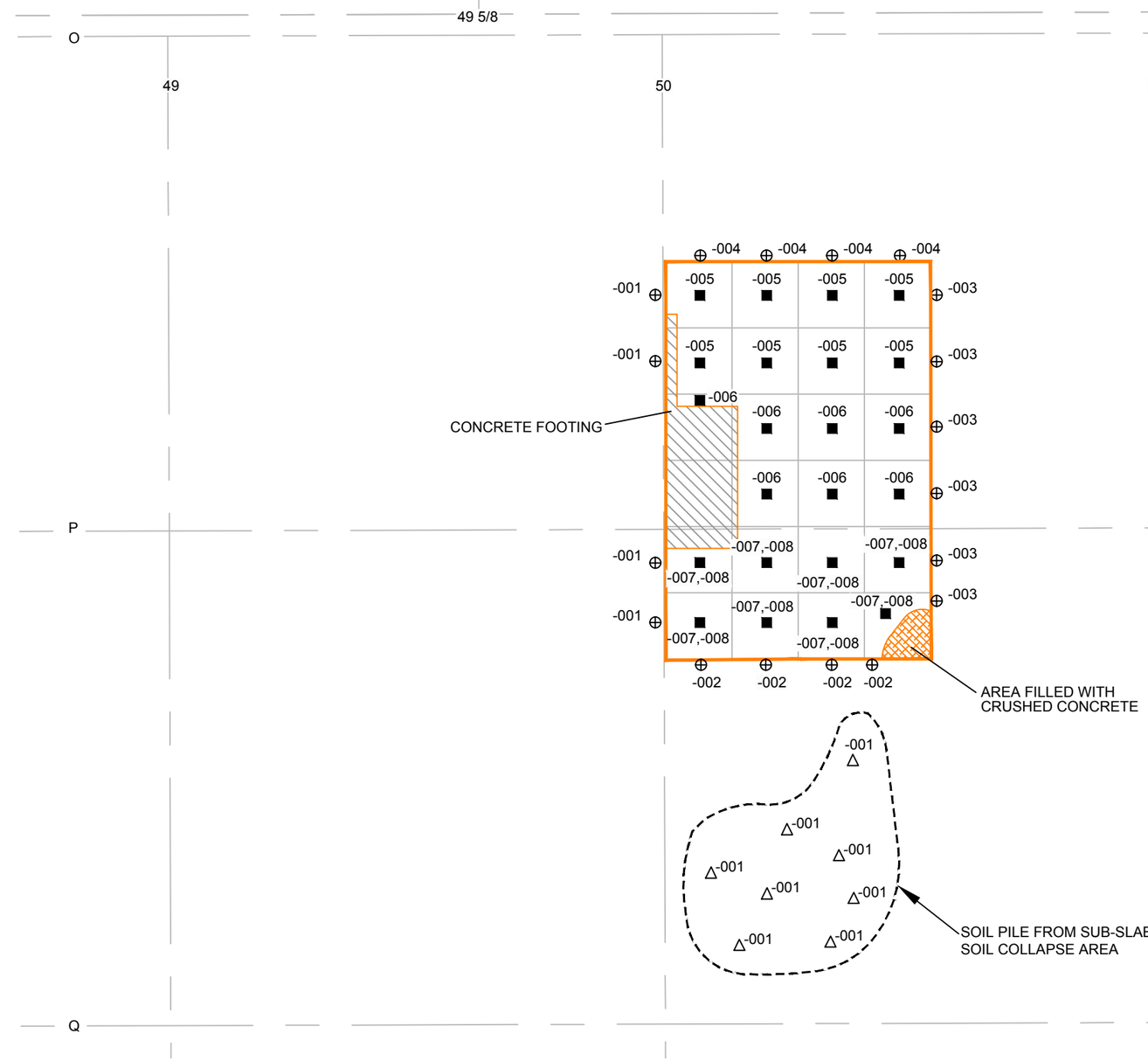


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figure 6.2

PCB AREA NO. 2 - VERIFICATION SAMPLE LOCATIONS
FORMER GRAND RAPIDS METAL PLANT
Wyoming, Michigan

VERIFICATION SAMPLE SUMMARY
SOIL CONTAINING PCB CLEANUP COMPLETION SUMMARY REPORT
FORMER GRAND RAPIDS METAL PLANT
WYOMING, MICHIGAN

Sample Date	*Sample Identification*	*Sample Location*	*Matrix*	*Sample Depth (ft bgs)*	*QC Sample*	*Analysis*
6/15/2012	SO-17360-061512-EB-001	PCB Area Soil Pile - Q-50	Soil	-		PCBs
8/22/2012	SO-17360-082212-EB-013	PCB Area No. 1 - Floor Composite -013	Soil	3		PCBs
8/22/2012	SO-17360-082212-EB-014	PCB Area No. 1 - Floor Composite -014	Soil	3		PCBs
8/22/2012	SO-17360-082212-EB-015	PCB Area No. 1 - Floor Composite -015	Soil	3	MS/MSD	PCBs
8/22/2012	SO-17360-082212-EB-009	PCB Area No. 1 - North Sidewall	Soil	1.5		PCBs
8/22/2012	SO-17360-082212-EB-011	PCB Area No. 1 - South Sidewall	Soil	1.5	Duplicate	PCBs
8/22/2012	SO-17360-082212-EB-012	PCB Area No. 1 - South Sidewall	Soil	1.5		PCBs
8/22/2012	SO-17360-082212-EB-010	PCB Area No. 1 - West Sidewall	Soil	1.5		PCBs
8/22/2012	SO-17360-082212-EB-004	PCB Area No. 2 - East Sidewall	Soil	1.5		PCBs
8/22/2012	SO-17360-082212-EB-005	PCB Area No. 2 - Floor Composite -005	Soil	3		PCBs
8/22/2012	SO-17360-082212-EB-006	PCB Area No. 2 - Floor Composite -006	Soil	3		PCBs
8/22/2012	SO-17360-082212-EB-007	PCB Area No. 2 - Floor Composite -007	Soil	3	Duplicate	PCBs
8/22/2012	SO-17360-082212-EB-008	PCB Area No. 2 - Floor Composite -008	Soil	3		PCBs
8/22/2012	SO-17360-082212-EB-001	PCB Area No. 2 - North Sidewall	Soil	1.5		PCBs
8/22/2012	SO-17360-082212-EB-003	PCB Area No. 2 - South Sidewall	Soil	1.5		PCBs
8/22/2012	SO-17360-082212-EB-002	PCB Area No. 2 - West Sidewall	Soil	1.5		PCBs

Notes:
PCBs - Polychlorinated Biphenyls
QC - Quality Control
MS/MSD - Matrix Spike /Matrix Spike Duplicate

TABLE 6.2

VERFICIATION SAMPLING ANALYTICAL RESULTS
SOIL CONTAINING PCB CLEANUP COMPLETION SUMMARY REPORT
FORMER GRAND RAPIDS METAL PLANT
WYOMING, MICHIGAN

Sample Location		*PCB Area No. 1 North Sidewall*	*PCB Area No. 1 South Sidewall*	*PCB Area No. 1 South Sidewall*	*PCB Area No. 1 West Sidewall*	*PCB Area No. 1 Floor Composite -013*	*PCB Area No. 1 Floor Composite -014*
Sample Identification		*SO-17360-082212-EB-009*	*SO-17360-082212-EB-011*	*SO-17360-082212-EB-012*	*SO-17360-082212-EB-010*	*SO-17360-082212-EB-013*	*SO-17360-082212-EB-014*
Sample Date		*8/22/2012*	*8/22/2012*	*8/22/2012*	*8/22/2012*	*8/22/2012*	*8/22/2012*
Sample Type				*Duplicate*			
Sample Depth		*(1.5-) ft BGS*	*(1.5-) ft BGS*	*(1.5-) ft BGS*	*(1.5-) ft BGS*	*(3) ft BGS*	*(3) ft BGS*
	Units						
Polychlorinated Biphenyls (PCBs)							
Aroclor-1016 (PCB-1016)	ug/kg	350 U	350 U	350 U	350 U	350 U	350 U
Aroclor-1221 (PCB-1221)	ug/kg	350 U	350 U	350 U	350 U	350 U	350 U
Aroclor-1232 (PCB-1232)	ug/kg	350 U	350 U	350 U	350 U	350 U	350 U
Aroclor-1242 (PCB-1242)	ug/kg	350 U	350 U	350 U	350 U	350 U	350 U
Aroclor-1248 (PCB-1248)	ug/kg	350 U	350 U	350 U	350 U	350 U	350 U
Aroclor-1254 (PCB-1254)	ug/kg	11 J	350 U	350 U	7.7 J	24 J	15 J
Aroclor-1260 (PCB-1260)	ug/kg	350 U	350 U	350 U	350 U	350 U	350 U
Total PCBs	ug/kg	11 J	ND	ND	7.7 J	24 J	15 J

TABLE 6.2

VERFICIATION SAMPLING ANALYTICAL RESULTS
SOIL CONTAINING PCB CLEANUP COMPLETION SUMMARY REPORT
FORMER GRAND RAPIDS METAL PLANT
WYOMING, MICHIGAN

Sample Location		*PCB Area No. 1 Floor Composite -015*	*PCB Area No. 2 East Sidewall*	*PCB Area No. 2 North Sidewall*	*PCB Area No. 2 South Sidewall*	*PCB Area No. 2 West Sidewall*
Sample Identification		*SO-17360-082212-EB-015*	*SO-17360-082212-EB-004*	*SO-17360-082212-EB-001*	*SO-17360-082212-EB-003*	*SO-17360-082212-EB-002*
Sample Date		*8/22/2012*	*8/22/2012*	*8/22/2012*	*8/22/2012*	*8/22/2012*
Sample Type						
Sample Depth		*(3) ft BGS*	*(1.5-) ft BGS*	*(1.5-) ft BGS*	*(1.5-) ft BGS*	*(1.5-) ft BGS*
	Units					
Polychlorinated Biphenyls (PCBs)						
Aroclor-1016 (PCB-1016)	ug/kg	350 U	350 U	340 U	350 U	340 U
Aroclor-1221 (PCB-1221)	ug/kg	350 U	350 U	340 U	350 U	340 U
Aroclor-1232 (PCB-1232)	ug/kg	350 U	350 U	340 U	350 U	340 U
Aroclor-1242 (PCB-1242)	ug/kg	350 U	350 U	340 U	350 U	340 U
Aroclor-1248 (PCB-1248)	ug/kg	350 U	350 U	340 U	350 U	340 U
Aroclor-1254 (PCB-1254)	ug/kg	38 J	350 U	51 J	130 J	340 U
Aroclor-1260 (PCB-1260)	ug/kg	26 J	350 U	340 U	20 J	340 U
Total PCBs	ug/kg	64 J	ND	51 J	150 J	ND

TABLE 6.2

VERFICIATION SAMPLING ANALYTICAL RESULTS
SOIL CONTAINING PCB CLEANUP COMPLETION SUMMARY REPORT
FORMER GRAND RAPIDS METAL PLANT
WYOMING, MICHIGAN

Sample Location		*PCB Area No. 2 Floor Composite -005*	*PCB Area No. 2 Floor Composite -006*	*PCB Area No. 2 Floor Composite -007*	*PCB Area No. 2 Floor Composite -008*	*PCB Area Soil Pile - Q-50*
Sample Identification		*SO-17360-082212-EB-005*	*SO-17360-082212-EB-006*	*SO-17360-082212-EB-007*	*SO-17360-082212-EB-008*	*SO-17360-061512-EB-001*
Sample Date		*8/22/2012*	*8/22/2012*	*8/22/2012*	*8/22/2012*	*6/15/2012*
Sample Type					*Duplicate*	
Sample Depth		*(3-) ft BGS*	*(3-) ft BGS*	*(3-) ft BGS*	*(3-) ft BGS*	*-*
	Units					
Polychlorinated Biphenyls (PCBs)						
Aroclor-1016 (PCB-1016)	ug/kg	350 U	350 U	350 U	340 U	340 U
Aroclor-1221 (PCB-1221)	ug/kg	350 U	350 U	350 U	340 U	340 U
Aroclor-1232 (PCB-1232)	ug/kg	350 U	350 U	350 U	340 U	340 U
Aroclor-1242 (PCB-1242)	ug/kg	350 U	350 U	350 U	340 U	340 U
Aroclor-1248 (PCB-1248)	ug/kg	350 U	350 U	350 U	340 U	340 U
Aroclor-1254 (PCB-1254)	ug/kg	13 J	37 J	12 J	7 J	340 U
Aroclor-1260 (PCB-1260)	ug/kg	350 U	350 U	350 U	340 U	340 U
Total PCBs	ug/kg	13 J	37 J	12 J	7 J	ND

APPENDIX A

SELF-IMPLEMENTING PLAN

SELF-IMPLEMENTING PLAN FOR THE REMEDIATION OF PCB-IMPACTED SOILS PURSUANT TO 40 CFR 761.61(a)

FORMER GRAND RAPIDS METAL PLANT
300 36th STREET SW
WYOMING, MICHIGAN

Prepared by:
Conestoga-Rovers & Associates

200 W. Allegan Street, Suite 300
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web: http://www.CRAworld.com

JUNE 2012
REF. NO. 017360 (28)

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1.0 INTRODUCTION/PURPOSE OF REPORT

Conestoga-Rovers & Associates (CRA) has prepared this Self-Implementing Plan (SIP) on behalf of Revitalizing Auto Communities Environmental Response (RACER) Trust for the former Grand Rapids Metal Plant property located at 300 36th Street SW in Wyoming, Michigan (Site). The Site location is presented on Figure 1.1. This SIP has been prepared for submittal to the United States Environmental Protection Agency (U.S. EPA) – Region 5, the Michigan Department of Environmental Quality (MDEQ), and the Kent County Health Department (KCHD) in accordance with the procedures set forth in 40 Code of Federal Regulations (CFR) 761.61(a) of the Toxic Substances Control Act (TSCA) regarding the characterization and remediation of polychlorinated biphenyl (PCB) remediation waste.

General Motors Corporation (GMC) initiated automotive manufacturing operations at the Site in 1936. Operations ceased at the Site on June 30, 2010. GMC filed for bankruptcy under Chapter 11 of the United States Bankruptcy Code on June 1, 2009. On July 10, 2009, pursuant to a bankruptcy court order, Motors Liquidation Company (MLC) retained ownership of the Site, and on October 20, 2010 entered into a settlement agreement with federal and state governmental authorities regarding MLC's environmental obligations at its remaining properties. According to the terms of the settlement agreement, RACER Trust became effective March 31, 2011 and interests in the Site were transferred to RACER Trust at that time to conduct, manage, and fund cleanup at the 89 sites formerly owned by MLC, including the Site. The Site was sold to the City of Wyoming Brownfield Redevelopment Authority (WBRA) on June 28, 2011; however, RACER Trust retains certain responsibilities related to subsurface contamination associated with historical operations at the Site by GMC. As such, the scope of this SIP is limited to specific subsurface areas of the Site only, as described in subsequent sections.

The Site is currently undergoing redevelopment activities including decommissioning, demolition, and property re-grading by contractors on behalf of the WBRA. The majority of the historical structures at the Site have been decommissioned and demolished, or are undergoing demolition at this time.

This SIP is being filed with the U.S. EPA, MDEQ, and the KCHD in accordance with 40 CFR 761.61(a)(3)(i). RACER Trust respectfully requests an expedited review of this SIP in order to assist the on-going redevelopment efforts of the WBRA's contractors in the removal of the former Main Manufacturing Building slab and re-grading activities in a timely manner.

2.0 SITE BACKGROUND/HISTORY

2.1 SITE DESCRIPTION

The Site is located at 300 36th Street SW and consists of approximately 88 acres of land. The Site historically included an approximately 2 million square-foot Main Manufacturing Building and several outlying buildings and ancillary structures (Wastewater Treatment Plant [WWTP], Power House, Press Staging Building, Primary Switch House, Baler House, Rack Make-Up Building, South Fire Pump House, West Fire Pump House, Storm Sewer Pump House, Cooling Tower Pump House, Metal Storage Shed, and Guard House), asphalt and concrete-paved areas, a stormwater retention pond, and vegetated and landscaped areas. The majority of the historical structures at the Site have been decommissioned and demolished, or are undergoing demolition at this time. Figure 2.1 presents a Site plan.

2.2 ENVIRONMENTAL SETTING

The Site is located in a mixed industrial, commercial, residential and recreational area in the City of Wyoming, Michigan with Buchanan Ave SW and mixed industrial/residential to the east, mixed recreational and residential to the north, railroad tracks and mixed commercial/industrial to the west, and 40th Street SW and residential to the south as further discussed below.

The Site is abutted to the north by Price and Company, Godwin Heights Public Schools athletic fields and residential properties, with Hillcroft Park located beyond.

The Site is abutted to the east by Buchanan Street followed by an Amoco gas station, Tint Factory, N&A Auto Repair, Prestige Transport, LLC, Steil Property Management, RSP Investment Property, Inc., MSC Industrial Supply Co., Clean Rooms International, Independent Glass, Chase Creative Unlimited, Ter Molen & Hart Sheet Metal, Tracer Tool & Die Co., United Auto Workers (UAW) Hall, Conical Tapered Mills, a vacant commercial/industrial building, a vacant lot, Mark Maker Company, and residential properties.

The Site is abutted to the south by 40th Street followed by Accurate Alignment & Brake and residential properties.

The Site is abutted to the west by railroad tracks, Cole Drain, Consumers high-tension power lines, Consumers Service Center, The Macomb Group, and Clay Avenue followed by Ryder Truck, Cummins, a vacant commercial/industrial building, K-Mac Plastics,

Floyd's Electric, Consolidated Metal Products, Inc., Rose Pest Solutions, Donald Engineering, and Earl Jourdan Auto Parts.

2.3 SITE HISTORY

GMC initiated automotive manufacturing operations at the Site in 1936. Additional buildings were constructed and the Site was expanded several times between 1937 and 2006. Primary operations conducted at the Site consisted of metal fabrication and assembly for consumer vehicles. Operations ceased at the Site on June 30, 2010. The Site is currently on the Michigan Act 451, Part 201 Site List (Site Identification No. 41000115) and RACER Trust is conducting Site-wide investigation and monitoring activities associated with the listing.

The Site is currently undergoing redevelopment activities including decommissioning, demolition, and property re-grading by contractors on behalf of the WBRA. The majority of the historical structures at the Site have been decommissioned and demolished, or are undergoing demolition at this time.

2.4 HISTORICAL USAGE OF PCBs

As part of initial facility decommissioning, a draft Facility Environmental Assessment (FEA) was performed by CRA in October 2010, which included an evaluation of above grade potential PCB-containing or impacted materials. Additionally, as part of the on-going investigations and assessments being conducted at the Site associated with the Michigan Act 451, Part 201 listing, a Current Conditions Report (CCR) was prepared by CRA in December 2010, which included an evaluation of potential PCB-containing materials. As previously indicated, the scope of this SIP is limited to specific subsurface areas of the Site only, as described in subsequent sections.

The scope of work for the FEA and CCR included a Site walkthroughs of accessible Site structures, interviews with Site personnel, and a Site file review to identify potential PCB-containing materials known or suspected to have been used at the Site. Information was compiled on Site during the Site inspection, file review and interviews by CRA. Information obtained included Site drawings, Site environmental records, and copies of miscellaneous lists (equipment, wastes, etc.).

According to historical document reviews and interviews with Site personnel, the known historical uses of PCBs at the Site included: fluorescent light ballasts, hydraulic oils in machinery, and dielectric oil within transformers and capacitors. Potential PCB-

containing materials or PCB-containing materials observed included: dielectric fluids; impacted concrete and metal surfaces; light ballasts; natural gas lines; non-electrical oil-containing equipment such as elevators, air compressors and dock levelers; and solid PCB bulk product materials (i.e., floor block).

3.0 SITE CHARACTERIZATION

As identified in Section 2.3, the Site is on the Michigan Act 451, Part 201 sites list and is currently undergoing investigation and cleanup on a voluntary basis. Numerous subsurface investigations have been conducted at the Site between 1981 and 2012, which primarily evaluated non-PCB related areas of concern.

This section addresses specific subsurface evaluations conducted relative to delineation of two areas (PCB Area No. 1 and PCB Area No. 2) where PCBs were identified during a Site-wide investigation at concentrations above the High Occupancy Area Cleanup Level of 1 ppm/1 mg/kg for bulk remediation waste (without further conditions) set forth in TSCA. These two areas are being addressed at this time as the new property owner implements redevelopment activities in the area of the former Main Manufacturing Building footprint. Additional areas of PCB detections in soil above the 1 mg/kg High Occupancy Area Cleanup Level are present at the Site outside the former Main Manufacturing Building footprint; however, are not addressed in this SIP. These areas will be further evaluated and addressed, as applicable, in accordance with 40 CFR 761.61 at a later date.

3.1 SOIL BORING INSTALLATION/SOIL SAMPLING

PCB Area Nos. 1 and 2 were investigated in February and September 2011, and April 2012 through the installation of soil borings and the collection of soil samples.

Soil borings were advanced utilizing a rotosonic or direct-push (i.e., Geoprobe®) drill rig with continuous Macrocore® sampling. The Macrocore® samples were logged, examined by a CRA geologist for visual/olfactory evidence of impact, and screened with an 11.7 electron volt (eV) bulb photoionization detector (PID). The stratigraphic soil boring logs are presented in Appendix A. Soil samples, including Quality Assurance/Quality Control (QA/QC) samples, were collected from the soil boring locations for laboratory analysis as described in Sections 3.1.1 and 3.1.2. A sample summary is presented in Table 3.1.

Soil cuttings were screened with an 11.7 eV bulb PID and examined for visual/olfactory indication of contamination. All soil cuttings were containerized in Department of Transportation (DOT)-approved 55-gallon drums labeled for future characterization and off-Site disposal.

Upon completion of soil sample collection, each soil boring was abandoned by backfilling the soil boring annulus with bentonite chips to the ground surface and properly hydrating.

A survey was completed for the soil boring locations. Soil boring locations and elevations were surveyed, with elevations to the nearest 0.01-foot. The elevations were referenced to a designated above mean sea level benchmark.

3.1.1 PCB AREA NO. 1

A Site-wide investigation was conducted in February 2012. As part of this investigation, one soil boring, SB61-11, was advanced in the central portion of the former Main Manufacturing Building. Soil samples were collected for chemical analysis from the 1 to 3-foot interval immediately beneath the concrete floor slab (0 to 1-foot interval was comprised on concrete floor slab) and from the 18 to 20-foot interval (immediately above the water table). The soil samples were submitted to the laboratory for chemical analysis for PCBs, Target Compound List (TCL) volatile organic compounds (VOCs), polynuclear aromatic hydrocarbons (PNAs), and Target Analyte List (TAL) metals (minus earth metals). Based on the analytical results, PCBs were detected in the soil sample collected from 1 to 3 feet bgs from SB61-11 at a concentration of 4.4 mg/kg.

Based on the detection of PCBs above 1 mg/kg in the shallow soil sample collected from SB61-11, five additional soil borings were advanced in September 2011, SB153-11 through SB156-11 and SB167-11. Soil borings SB153-11 through SB155-11 and SB167-11 were advanced on 10-foot spacing directly to the north, south, east, and west of SB61-11 and SB156-11 was advanced adjacent to SB61-11. Soil samples were collected from SB153-11 through SB155-11 and SB167-11 for chemical analysis for PCBs in 2-foot intervals beginning immediately beneath the concrete floor slab and continuing to approximately 10 feet bgs. Soil samples collected from the interval immediately beneath the floor slab were analyzed by the laboratory, with the underlying 2-foot interval samples placed on hold at the laboratory pending receipt of the initial analysis for the known impacted interval. Soil samples were collected from SB156-11 for chemical analysis for PCBs in 2-foot intervals beginning immediately beneath the concrete floor slab and continuing to approximately 10 feet bgs. The soil samples collected from the 0.5 to 2.5-foot and 2.5 to 4.0-foot intervals were analyzed by the laboratory, with the underlying 2-foot interval samples placed on hold at the laboratory pending receipt of the initial analysis for the known impacted interval. Based on the analytical results, PCBs were not detected in any of the samples collected. Therefore, the deeper samples were not analyzed by the laboratory.

Based on the results of the February and September 2011 investigations, four additional soil borings, SB173-12 through SB176-12, were advanced in April 2012. Soil borings SB173-12 through SB176-12 were advanced on 10-foot spacing to the northeast, northwest, southeast, and southwest of SB61-11/SB156-11 to complete the required delineation grid of the area. Soil samples were collected from SB173-12 through SB176-12 for chemical analysis for PCBs in 2-foot intervals beginning immediately beneath the concrete floor slab and continuing to approximately 10 feet bgs. It should be noted that in SB173-12, the concrete slab was 2 feet thick, so the interval for the initial soil sample was the 2 to 4-foot interval, with refusal from concrete encountered below this level. Soil samples collected from the interval immediately beneath the floor slab and the subsequent interval were analyzed by the laboratory, with the underlying 2-foot interval samples placed on hold at the laboratory pending receipt of the initial analysis for the known impacted interval. Based on the analytical results, PCBs were not detected in any of the samples collected at a concentration above 1 mg/kg. Therefore, the deeper samples were not analyzed by the laboratory.

Stratigraphic soil boring logs are presented in Appendix A. Table 3.1 presents a sample summary. Table 3.2 presents a summary of PCB analytical results for PCB Area No. 1. Figure 3.1 presents the sample locations and results for PCBs.

3.1.2 PCB AREA NO. 2

A Site-wide investigation was conducted in February 2011. As part of this investigation, one soil boring, SB124-11, was advanced in the central portion of the former Main Manufacturing Building. Soil samples were collected for chemical analysis from the 1 to 3-foot interval immediately beneath the concrete floor slab (0 to 1-foot interval was comprised on concrete floor slab) and from the 17 to 19-foot interval (immediately above the water table). The soil samples were submitted to the laboratory for chemical analysis for PCBs, TCL VOCs, PNAs, and TAL metals (minus earth metals). Based on the analytical results, PCBs were detected in the soil sample collected from 1 to 3 feet bgs from SB124-11 at a concentration of 1.3 mg/kg.

Based on the detection of PCBs above 1 mg/kg in the shallow soil sample collected from SB124-11, five additional soil borings were advanced in September 2011, SB157-11 through SB161-11. Soil borings SB157-11 through SB159-11 and SB161-11 were advanced on 10-foot spacing directly to the north, south, east, and west of SB124-11 and SB160-11 was advanced adjacent to SB124-11. Soil samples were collected from SB157-11 through SB159-11 and SB161-11 for chemical analysis for PCBs in 2-foot intervals beginning immediately beneath the concrete floor slab and continuing to approximately 10 feet bgs. Soil samples collected from the interval immediately beneath the floor slab were

analyzed by the laboratory, with the underlying 2-foot interval samples placed on hold at the laboratory pending receipt of the initial analysis for the known impacted interval. Soil samples were collected from SB160-11 for chemical analysis for PCBs in 2-foot intervals beginning immediately beneath the concrete floor slab and continuing to approximately 10 feet bgs. The soil samples collected from the 0.5 to 2.5-foot and 2.5 to 4.0-foot intervals were analyzed by the laboratory, with the underlying 2-foot interval samples placed on hold at the laboratory pending receipt of the initial analysis for the known impacted interval. Based on the analytical results, PCBs were detected in the soil sample collected from the 0.6 to 2.6-foot interval from SB159-11 at a concentration of 1.1 mg/kg. Therefore, the soil samples from the 2.6 to 4-foot and 4 to 6-foot intervals were analyzed by the laboratory. The analytical results for the deeper interval samples collected from SB159-11 and the shallow interval samples from the remainder of the borings did not indicate the presence of PCBs at concentrations above 1 mg/kg. Therefore, additional deeper samples were not analyzed by the laboratory

Based on the results of the February and September 2011 investigations, seven additional soil borings, SB181-12 through SB187-12, were planned for April 2012 to complete the required delineation grid of the area. Upon mobilization to the Site to conduct the delineation activities, it was identified that previous soil excavation activities had been conducted in the area immediately to the southwest of the delineation area and the concrete and underlying partially collapsed soil to the southwest of SB159-11 area was determined to be unstable and unsafe for the situation of the drill rig for the advancement of soil borings, SB182-12 and SB183-12. According to individuals associated with the on-going redevelopment activities, the materials that were excavated to the south-southwest of the delineation area were stockpiled on the concrete floor slab of the former Main Manufacturing Building immediately adjacent to the delineation and excavated areas. This material appears to be approximately 30 cubic yards in volume. An 8-point composite sample of this material will be collected to confirm that PCBs are not detected at a concentration of 1 ppm in the excavated material. Soil borings SB181-12 and SB184-12 through SB187-12 were advanced on 10-foot spacing to the northeast, northwest, southeast, and southwest of SB124-11/SB160-11 and SB159-11. Soil samples were collected from SB181-12 and SB184-12 through SB187-12 for chemical analysis for PCBs in 2-foot intervals beginning immediately beneath the concrete floor slab and continuing to approximately 10 feet bgs. Soil samples collected from the interval immediately beneath the floor slab and the subsequent interval were analyzed by the laboratory, with the underlying 2-foot interval samples placed on hold at the laboratory pending receipt of the initial analysis for the known impacted interval. Based on the analytical results, PCBs were not detected in any of the samples collected at a concentration above 1 mg/kg. Therefore, the deeper samples were not analyzed by the laboratory.

Stratigraphic soil boring logs are presented in Appendix A. Table 3.1 presents a sample summary. Table 3.3 presents a summary of PCB analytical results for PCB Area No. 2. Figure 3.2 presents the sample locations and results for PCBs.

3.2 ANALYTICAL METHODS

The soil samples were submitted under chain-of-custody protocols to Test America Laboratories of North Canton, Ohio or TriMatrix Laboratories of Grand Rapids, Michigan. The soil samples were extracted and analyzed for individual Aroclors (Aroclors 1016, 1221, 1232, 1242, 1248, 1254, and 1260) and total PCBs utilizing U.S.EPA Method 3540C/3550C for extraction/preparation and Method 8082/8082A for chemical analysis consistent with SW-846 "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods" 3rd Edition, and promulgated updates, November 1986.

Copies of analytical reports will be maintained and available for review by U.S. EPA as identified in Section 6.0.

3.3 DATA VALIDATION

All analytical data was assessed utilizing quality control criteria established by the Quality Assurance Project Plan (QAPP) for the on-going Part 201 investigation work at the Site. Data validation memoranda outlining the details of the data validation will be maintained and available for review by U.S. EPA as identified in Section 6.0.

4.0 CLEANUP PLAN/REMEDIATION APPROACH

Based on the pre-cleanup characterization results, soil materials within the boundaries of the delineation to less than 1 ppm will be removed via excavation for off-Site disposal.

Soils will be removed to approximately 3 feet bgs for PCB Area Nos. 1 and 2. Approximately 250 cubic yards of material is anticipated to be removed from PCB Area No. 1 and approximately 390 cubic yards of material is anticipated to be removed from PCB Area No. 2 for off-Site disposal. For PCB Area No. 2, soil will also be removed from the area originally anticipated to be delineated through soil borings SB182-12 and SB183-12, to the extent of the area previously excavated during redevelopment activities (see Section 3.1.2). The anticipated extent of the proposed excavations for PCB Area Nos. 1 and 2 is presented on Figures 3.1 and 3.2, respectively.

Based on the pre-cleanup characterization, all materials have a PCB concentration of less than 50 ppm. These materials will be disposed of at Waste Management's Autumn Hills Landfill in Zeeland, Michigan, in accordance with 40 CFR 761.61 (a)(5).

5.0 SOIL VERIFICATION

Pre-cleanup characterization was conducted in accordance with the requirements of 40 CFR 761 Subpart N. As identified in Sections 3.0 and 4.0, results were compared to the cleanup standard of 1.0 ppm for bulk PCB remediation waste located in high-occupancy areas per 40 CFR 761.61(a)(4)(i)(A) and excavation will be conducted in the delineated extent to this cleanup level. No further verification sampling is proposed under 40 CFR 761; however, one additional floor soil sample from PCB Area No. 1 and one additional floor soil sample from PCB Area No. 2 will be collected for analysis for PCBs to meet MDEQ requirements.

6.0 PLAN CERTIFICATION

Pursuant to 40 CFR 761.61 (a)(3)(i)(E), all sampling plans, sample collection procedures, sample preparation procedures, extraction procedures, and instrument/chemical analysis procedures used to assess or characterize the PCB contamination related to the investigation and cleanup activities specified herein will be maintained in the following location and accessible for inspection by U.S. EPA:

- Conestoga-Rovers & Associates, Inc.
  Attn: Jennifer Quigley, P.E.
  200 West Allegan Street, Suite 300
  Plainwell, Michigan 49080-1397

Barbara VanDuren — 6/6/12

Property Owner's Representative Signature — *Date*

Barbara Van Duren

Property Owner's Representative Printed Name

1155 28th Street SW, Wyoming, MI 49509

Address of Property Owner

Jennifer Quigley FOR DAVE FAVERO — 6/1/12

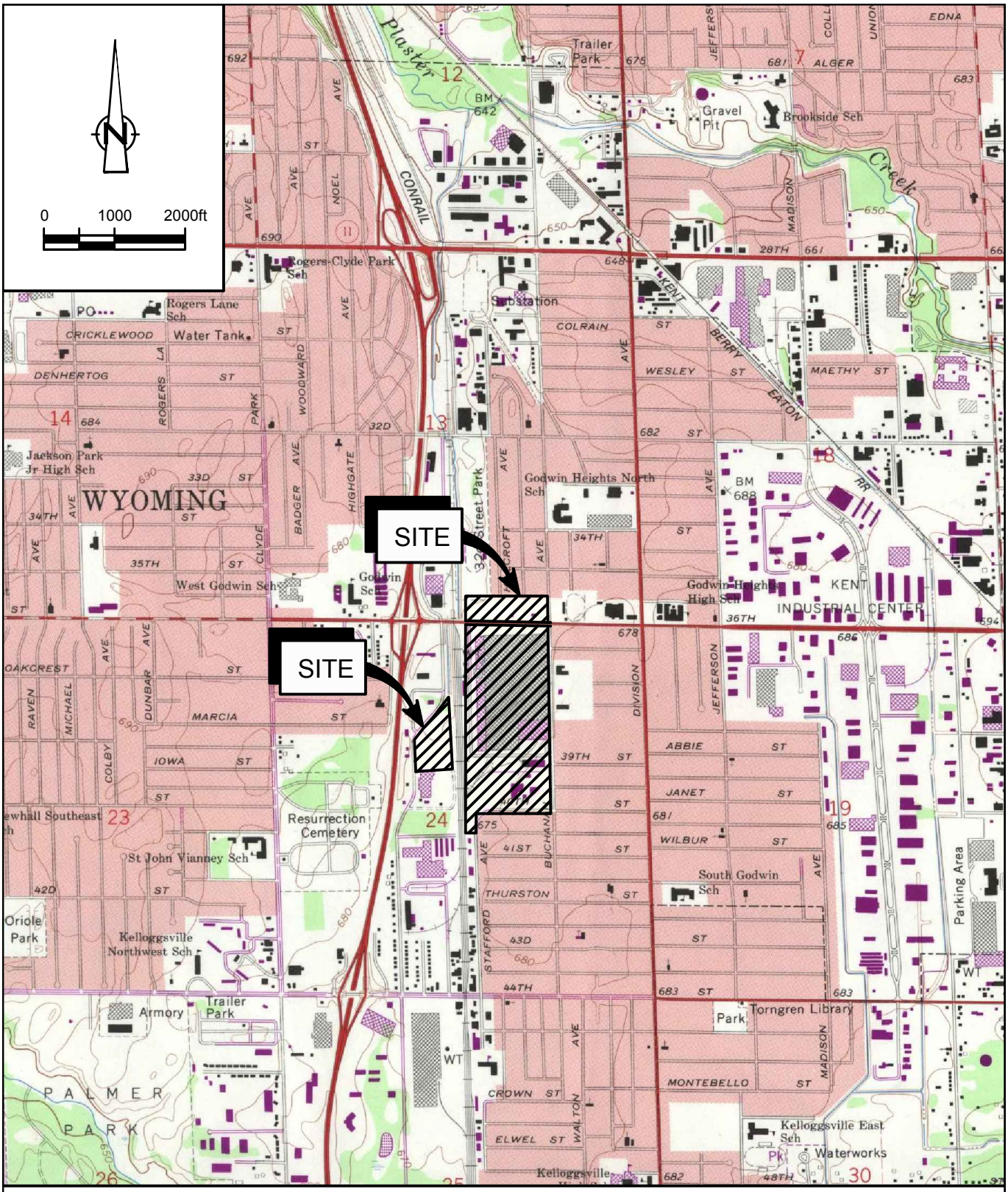
Cleanup Party's Representative Signature — *Date*

David Favero, Deputy Cleanup Manager

Cleanup Party's Representative Printed Name

2930 Ecorse Road, Ypsilanti, MI 48198

Address of Cleanup Party



SOURCE: USGS QUADRANGLE MAP;
GRAND RAPIDS WEST, MICHIGAN

figure 1.1

GRAND RAPIDS

SITE LOCATION
FORMER GRAND RAPIDS METAL PLANT
Wyoming, Michigan

017360-T05(028)GN-DE005 MAY 31/2012

RESIDENTIAL

COMMERCIAL

COMMERCIAL/INDUSTRIAL

COMMERCIAL/RESIDENTIAL

RESIDENTIAL

RESIDENTIAL

BUCHANAN STREET

367TH STREET

407TH STREET

STAFFORD

FORMER MAIN MANUFACTURING BUILDING

FORMER RACK MAKE-UP BUILDING

FORMER POWER HOUSE

PUMP HOUSE

500,000 GALLON WATER STORAGE TANK

FORMER USED OIL AST

FORMER PRESS STAGING BUILDING

FORMER WWTP

FORMER BALER HOUSE

PRIMARY SWITCH HOUSE

GUARD HOUSE

TRUCK SCALE PIT

STORM SEWER PUMP HOUSE

METAL STORAGE SHED

STORM WATER RETENTION BASIN

CLAY AVE.

EMPLOYEE ENTRANCE BUILDING

0 100 250ft

LEGEND

APPROXIMATE PROPERTY BOUNDARY

AREA OF PCB IMPACTED SOIL EVALUATION

FENCE

RAILROAD

COLE DRAIN

figure 1.2

SITE PLAN
FORMER GRAND RAPIDS METAL PLANT
Wyoming, Michigan

017360-T05(028)GN-DE006 MAY 31/2012

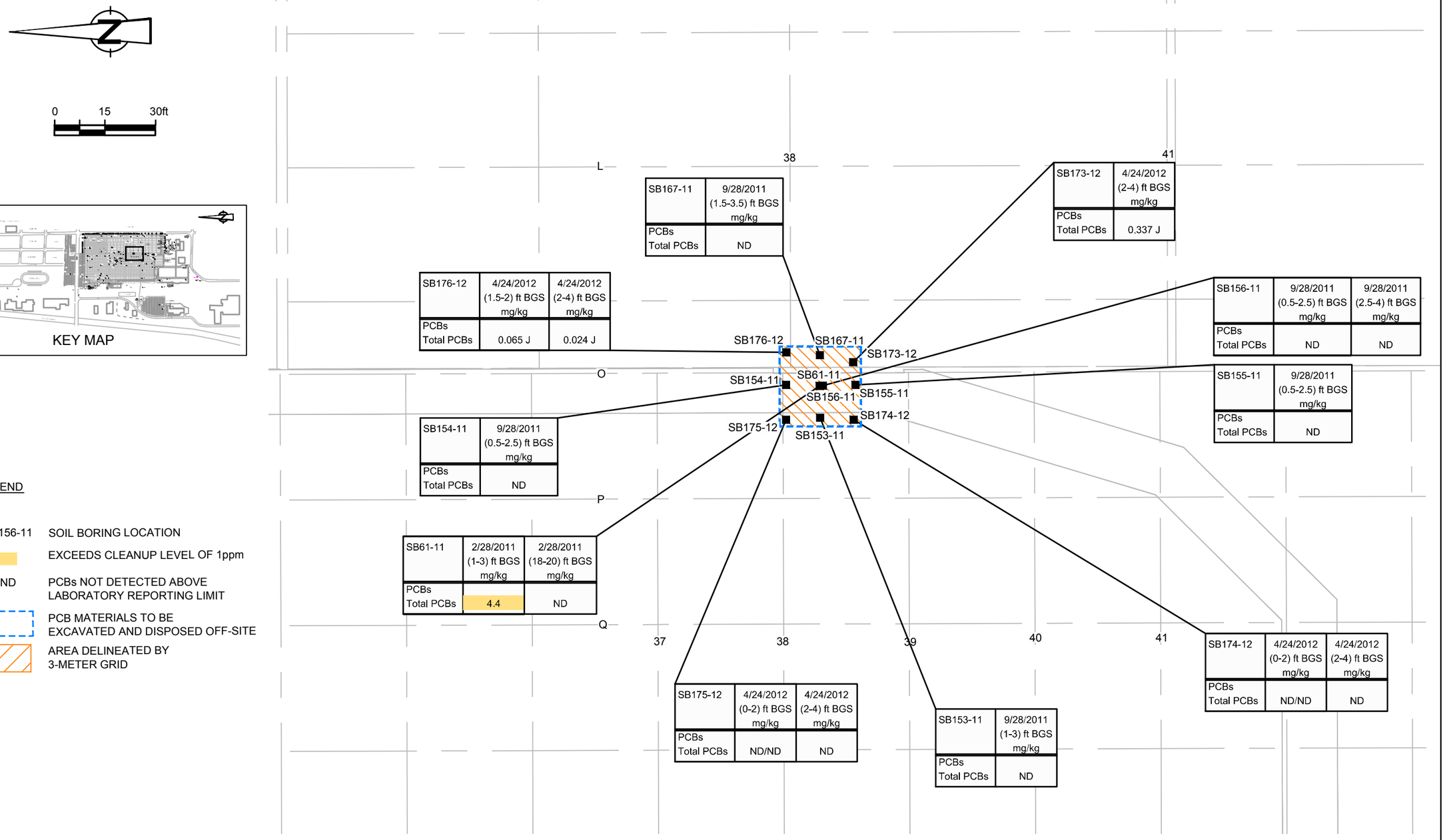
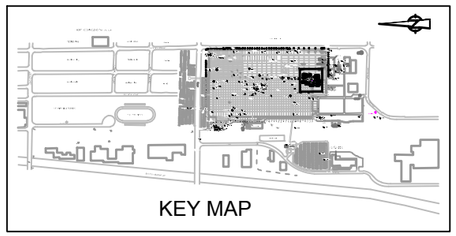


figure 3.1

DRAFT

PCB AREA NO. 1 - DELINEATION SAMPLE LOCATIONS
FORMER GRAND RAPIDS METAL PLANT
Wyoming, Michigan

0 15 30ft



SB187-12	4/23/2012 (0-2) ft BGS mg/kg	4/23/2012 (2-4) ft BGS mg/kg
PCBs Total PCBs	0.15 J	ND

SB161-11	9/27/2011 (0.5-2.5) ft BGS mg/kg
PCBs Total PCBs	ND

SB181-12	4/23/2012 (0-2) ft BGS mg/kg	4/23/2012 (2-4) ft BGS mg/kg
PCBs Total PCBs	ND	0.0054 J

SB157-11	9/27/2011 (0.7-2.7) ft BGS mg/kg
PCBs Total PCBs	ND

SB158-11	9/27/2011 (0.5-2.5) ft BGS mg/kg
PCBs Total PCBs	ND

SB160-11	9/27/2011 (0.5-2.5) ft BGS mg/kg	9/27/2011 (2.5-4) ft BGS mg/kg
PCBs Total PCBs	ND	ND

SB159-11	9/27/2011 (0.6-2.6) ft BGS mg/kg	9/27/2011 (2.6-4) ft BGS mg/kg	9/27/2011 (4-6) ft BGS mg/kg
PCBs Total PCBs	1.1	ND	ND

SB124-11	2/21/2011 (1-3) ft BGS mg/kg	2/21/2011 (17-19) ft BGS mg/kg
PCBs Total PCBs	1.3	ND

SB186-12	4/23/2012 (0-2) ft BGS mg/kg	4/23/2012 (2-4) ft BGS mg/kg
PCBs Total PCBs	0.11 J	0.047 J/0.05 J

SB185-12	4/23/2012 (0-2) ft BGS mg/kg	4/23/2012 (2-4) ft BGS mg/kg
PCBs Total PCBs	ND	ND

SB184-12	4/23/2012 (0-2) ft BGS mg/kg	4/23/2012 (2-4) ft BGS mg/kg
PCBs Total PCBs	ND	ND

O P Q R

49 5/8 49 50 51 52 1/4

SB161-11 SB187-12 SB181-12 SB124-11 SB157-11 SB158-11 SB160-11 SB186-12 SB159-11 SB185-12 SB184-12

LEGEND

■ SB156-11 SOIL BORING LOCATION

EXCEEDS CLEANUP LEVEL OF 1ppm

ND PCBs NOT DETECTED ABOVE LABORATORY REPORTING LIMIT

PCB MATERIALS TO BE EXCAVATED AND DISPOSED OFF-SITE

AREA DELINEATED BY 3-METER GRID

AREA OF PARTIAL SOIL COLLAPSE BENEATH SLAB DUE TO ADJACENT SLAB REMOVAL/ EXCAVATION

DRAFT

figure 3.2

PCB AREA NO. 2 - DELINEATION SAMPLE LOCATIONS
FORMER GRAND RAPIDS METAL PLANT
Wyoming, Michigan

SAMPLE SUMMARY
SELF IMPLEMENTING PLAN
FORMER GRAND RAPIDS METAL PLANT
WYOMING, MICHIGAN

Sample Date	*Sample Identification*	*Sample Location*	*Matrix*	*Sample Depth (ft bgs)*			*QC Sample*	*Analysis*
2/21/2011	SO-17360-022111-DR-105	SB124-11	Soil	1	to	3		PCBs
2/21/2011	SO-17360-022111-DR-106	SB124-11	Soil	17	to	19		PCBs
2/28/2011	SO-17360-022811-DR-134	SB61-11	Soil	1	to	3		PCBs
2/28/2011	SO-17360-022811-DR-135	SB61-11	Soil	18	to	20		PCBs
9/27/2011	S-17360-092711-EM-009	SB159-11	Soil	0.6	to	2.6		PCBs
9/27/2011	S-17360-092711-EM-010	SB159-11	Soil	2.6	to	4		PCBs
9/27/2011	S-17360-092711-EM-011	SB159-11	Soil	4	to	6		PCBs
9/27/2011	SO-17360-092711-EM-012	SB159-11	Soil	6	to	8		PCBs[1]
9/27/2011	SO-17360-092711-EM-013	SB159-11	Soil	8	to	10		PCBs[1]
9/27/2011	S-17360-092711-EM-014	SB158-11	Soil	0.5	to	2.5		PCBs
9/27/2011	SO-17360-092711-EM-015	SB158-11	Soil	2.5	to	4		PCBs[1]
9/27/2011	SO-17360-092711-EM-016	SB158-11	Soil	4	to	6		PCBs[1]
9/27/2011	SO-17360-092711-EM-017	SB158-11	Soil	6	to	8		PCBs[1]
9/27/2011	SO-17360-092711-EM-018	SB158-11	Soil	8	to	10		PCBs[1]
9/27/2011	S-17360-092711-EM-019	SB161-11	Soil	0.5	to	2.5		PCBs
9/27/2011	SO-17360-092711-EM-020	SB161-11	Soil	2.5	to	4		PCBs[1]
9/27/2011	SO-17360-092711-EM-021	SB161-11	Soil	4	to	6		PCBs[1]
9/27/2011	SO-17360-092711-EM-022	SB161-11	Soil	6	to	8		PCBs[1]
9/27/2011	SO-17360-092711-EM-023	SB161-11	Soil	8	to	10		PCBs[1]
9/27/2011	S-17360-092711-EM-024	SB160-11	Soil	0.5	to	2.5		PCBs
9/27/2011	S-17360-092711-EM-025	SB160-11	Soil	2.5	to	4		PCBs
9/27/2011	SO-17360-092711-EM-026	SB160-11	Soil	4	to	6		PCBs[1]
9/27/2011	SO-17360-092711-EM-027	SB160-11	Soil	6	to	8		PCBs[1]
9/27/2011	SO-17360-092711-EM-028	SB160-11	Soil	8	to	10		PCBs[1]
9/27/2011	S-17360-092711-EM-029	SB157-11	Soil	0.7	to	2.7		PCBs
9/27/2011	SO-17360-092711-EM-030	SB157-11	Soil	2.7	to	5		PCBs[1]
9/27/2011	SO-17360-092711-EM-031	SB157-11	Soil	5	to	7		PCBs[1]
9/28/2011	S-17360-092811-EM-038	SB154-11	Soil	0.5	to	2.5		PCBs
9/28/2011	SO-17360-092811-EM-039	SB154-11	Soil	2.5	to	4		PCBs[1]
9/28/2011	SO-17360-092811-EM-040	SB154-11	Soil	4	to	6		PCBs[1]
9/28/2011	SO-17360-092811-EM-041	SB154-11	Soil	6	to	8		PCBs[1]
9/28/2011	SO-17360-092811-EM-042	SB154-11	Soil	8	to	10		PCBs[1]
9/28/2011	S-17360-092811-EM-043	SB156-11	Soil	0.5	to	2.5		PCBs
9/28/2011	S-17360-092811-EM-044	SB156-11	Soil	2.5	to	4		PCBs
9/28/2011	SO-17360-092811-EM-045	SB156-11	Soil	4	to	6		PCBs[1]
9/28/2011	SO-17360-092811-EM-046	SB156-11	Soil	6	to	8		PCBs[1]
9/28/2011	SO-17360-092811-EM-047	SB156-11	Soil	8	to	10		PCBs[1]
9/28/2011	S-17360-092811-EM-048	SB155-11	Soil	0.5	to	2.5		PCBs
9/28/2011	SO-17360-092811-EM-049	SB155-11	Soil	2.5	to	4		PCBs[1]
9/28/2011	SO-17360-092811-EM-050	SB155-11	Soil	4	to	6		PCBs[1]
9/28/2011	SO-17360-092811-EM-051	SB155-11	Soil	6	to	8		PCBs[1]
9/28/2011	SO-17360-092811-EM-052	SB155-11	Soil	8	to	10		PCBs[1]
9/28/2011	S-17360-092811-EM-053	SB153-11	Soil	1	to	3		PCBs
9/28/2011	SO-17360-092811-EM-054	SB153-11	Soil	3	to	5		PCBs[1]
9/28/2011	SO-17360-092811-EM-055	SB153-11	Soil	5	to	7		PCBs[1]
9/28/2011	SO-17360-092811-EM-056	SB153-11	Soil	7	to	9		PCBs[1]
9/28/2011	SO-17360-092811-EM-057	SB153-11	Soil	9	to	10		PCBs[1]
9/28/2011	S-17360-092811-EM-058	SB167-11	Soil	1.5	to	3.5		PCBs
9/28/2011	SO-17360-092811-EM-059	SB167-11	Soil	3.5	to	5.5		PCBs[1]
9/28/2011	SO-17360-092811-EM-060	SB167-11	Soil	5.5	to	7.5		PCBs[1]
9/28/2011	SO-17360-092811-EM-061	SB167-11	Soil	7.5	to	9.5		PCBs[1]
4/23/2012	SO-17360-042312-EB-001	SB186-12	Soil	0	to	2		PCBs
4/23/2012	SO-17360-042312-EB-002	SB186-12	Soil	2	to	4		PCBs
4/23/2012	SO-17360-042312-EB-003	SB186-12	Soil	2	to	4	Duplicate (-002)	PCBs
4/23/2012	SO-17360-042312-EB-004	SB186-12	Soil	4	to	6		PCBs[1]
4/23/2012	SO-17360-042312-EB-005	SB186-12	Soil	4	to	6	Duplicate (-004)	PCBs[1]
4/23/2012	SO-17360-042312-EB-006	SB186-12	Soil	6	to	8	MS/MSD	PCBs[1]
4/23/2012	SO-17360-042312-EB-007	SB186-12	Soil	8	to	10		PCBs[1]
4/23/2012	SO-17360-042312-EB-008	SB185-12	Soil	0	to	2		PCBs
4/23/2012	SO-17360-042312-EB-009	SB185-12	Soil	2	to	4		PCBs
4/23/2012	SO-17360-042312-EB-010	SB185-12	Soil	4	to	6		PCBs[1]

SAMPLE SUMMARY
SELF IMPLEMENTING PLAN
FORMER GRAND RAPIDS METAL PLANT
WYOMING, MICHIGAN

Sample Date	*Sample Identification*	*Sample Location*	*Matrix*	*Sample Depth (ft bgs)*			*QC Sample*	*Analysis*
4/23/2012	SO-17360-042312-EB-011	SB185-12	Soil	6	to	8		PCBs[1]
4/23/2012	SO-17360-042312-EB-012	SB185-12	Soil	8	to	10		PCBs[1]
4/23/2012	SO-17360-042312-EB-013	SB184-12	Soil	0	to	2		PCBs
4/23/2012	SO-17360-042312-EB-014	SB184-12	Soil	2	to	4		PCBs
4/23/2012	SO-17360-042312-EB-015	SB184-12	Soil	4	to	6		PCBs[1]
4/23/2012	SO-17360-042312-EB-016	SB184-12	Soil	6	to	8		PCBs[1]
4/23/2012	SO-17360-042312-EB-017	SB184-12	Soil	6	to	8	Duplicate (-016)	PCBs[1]
4/23/2012	SO-17360-042312-EB-018	SB184-12	Soil	8	to	10		PCBs[1]
4/23/2012	SO-17360-042312-EB-019	SB187-12	Soil	0	to	2		PCBs
4/23/2012	SO-17360-042312-EB-020	SB187-12	Soil	2	to	4		PCBs
4/23/2012	SO-17360-042312-EB-021	SB187-12	Soil	4	to	6		PCBs[1]
4/23/2012	SO-17360-042312-EB-022	SB187-12	Soil	6	to	8		PCBs[1]
4/23/2012	SO-17360-042312-EB-023	SB187-12	Soil	8	to	10		PCBs[1]
4/23/2012	SO-17360-042312-EB-024	SB181-12	Soil	0	to	2	MS/MSD	PCBs
4/23/2012	SO-17360-042312-EB-025	SB181-12	Soil	2	to	4		PCBs
4/23/2012	SO-17360-042312-EB-026	SB181-12	Soil	4	to	6		PCBs[1]
4/23/2012	SO-17360-042312-EB-027	SB181-12	Soil	6	to	8		PCBs[1]
4/23/2012	SO-17360-042312-EB-028	SB181-12	Soil	8	to	10		PCBs[1]
4/24/2012	S-17360-042412-EM-052	SB176-12	Soil	1.5	to	2	MS/MSD	PCBs
4/24/2012	S-17360-042412-EM-053	SB176-12	Soil	2	to	4		PCBs
4/24/2012	S-17360-042412-EM-054	SB176-12	Soil	4	to	6		PCBs[1]
4/24/2012	S-17360-042412-EM-055	SB176-12	Soil	6	to	8		PCBs[1]
4/24/2012	S-17360-042412-EM-056	SB176-12	Soil	8	to	10	MS/MSD	PCBs[1]
4/24/2012	S-17360-042412-EM-057	SB175-12	Soil	0	to	2		PCBs
4/24/2012	S-17360-042412-EM-058	SB175-12	Soil	0	to	2	Duplicate (-057)	PCBs
4/24/2012	S-17360-042412-EM-059	SB175-12	Soil	2	to	4		PCBs
4/24/2012	S-17360-042412-EM-060	SB175-12	Soil	4	to	6		PCBs[1]
4/24/2012	S-17360-042412-EM-061	SB175-12	Soil	6	to	8		PCBs[1]
4/24/2012	S-17360-042412-EM-062	SB175-12	Soil	8	to	10		PCBs[1]
4/24/2012	S-17360-042412-EM-063	SB175-12	Soil	8	to	10	Duplicate (-062)	PCBs[1]
4/24/2012	S-17360-042412-EM-064	SB174-12	Soil	0	to	2		PCBs
4/24/2012	S-17360-042412-EM-065	SB174-12	Soil	0	to	2		PCBs
4/24/2012	S-17360-042412-EM-066	SB174-12	Soil	2	to	4		PCBs
4/24/2012	S-17360-042412-EM-067	SB174-12	Soil	4	to	6		PCBs[1]
4/24/2012	S-17360-042412-EM-068	SB174-12	Soil	4	to	6	Duplicate (-067)	PCBs[1]
4/24/2012	S-17360-042412-EM-069	SB174-12	Soil	6	to	8		PCBs[1]
4/24/2012	S-17360-042412-EM-070	SB174-12	Soil	8	to	10		PCBs[1]
4/24/2012	S-17360-042412-EM-071	SB173-12	Soil	2	to	4		PCBs

Notes:

PCBs - Polychlorinated Biphenyls

QC - Quality Control

MS/MSD - Matrix Spike /Matrix Spike Duplicate

[1] - The sample was submitted to the analytical laboratory on hold, but not analyzed.

TABLE 3.2

SUMMARY OF ANAYLTICAL RESULTS FOR PCB AREA NO. 1
SELF IMPLEMENTING PLAN
FORMER GRAND RAPIDS METAL PLANT
WYOMING, MICHIGAN

Sample Location			*SB61-11*	*SB61-11*	*SB153-11*	*SB154-11*	*SB155-11*	*SB156-11*	*SB156-11*
Sample Identification		Toxic	*SO-17360-022811-DR-134*	*SO-17360-022811-DR-135*	*S-17360-092811-EM-053*	*S-17360-092811-EM-038*	*S-17360-092811-EM-048*	*S-17360-092811-EM-043*	*S-17360-092811-EM-044*
Sample Date		Substances	*2/28/2011*	*2/28/2011*	*9/28/2011*	*9/28/2011*	*9/28/2011*	*9/28/2011*	*9/28/2011*
Sample Depth		Control	*(1-3) ft BGS*	*(18-20) ft BGS*	*(1-3) ft BGS*	*(0.5-2.5) ft BGS*	*(0.5-2.5) ft BGS*	*(0.5-2.5) ft BGS*	*(2.5-4) ft BGS*
Sample Type		Act [1]							
	Units								
PCBs									
Aroclor-1016 (PCB-1016)	ug/kg	--	2900 U	270 U	34 U	35 U	34 U	35 U	35 UJ
Aroclor-1221 (PCB-1221)	ug/kg	--	2900 U	270 U	34 U	35 U	34 U	35 U	35 UJ
Aroclor-1232 (PCB-1232)	ug/kg	--	2900 U	270 U	34 U	35 U	34 U	35 U	35 UJ
Aroclor-1242 (PCB-1242)	ug/kg	--	2900 U	270 U	34 U	35 U	34 U	35 U	35 UJ
Aroclor-1248 (PCB-1248)	ug/kg	--	2900 U	270 U	34 U	35 U	34 U	35 U	35 UJ
Aroclor-1254 (PCB-1254)	ug/kg	--	4400	270 U	34 U	35 U	34 U	35 U	35 UJ
Aroclor-1260 (PCB-1260)	ug/kg	--	2900 U	270 U	34 U	35 U	34 U	35 U	35 UJ
Total PCBs	ug/kg	1000	**4400**	ND	ND	ND	ND	ND	ND

Notes:

[1] Cleanup Level of 1 ppm for Bulk PCB Remediation Waste for High Occupancy Areas without further conditions per 40 CFR 761.61(a)(4)(i)(A)

Exceeds 1 ppm Cleanup Level

U - Not present at or above the associated value.

J - Estimated concentration.

-- Criteria not available

TABLE 3.2

SUMMARY OF ANAYLTICAL RESULTS FOR PCB AREA NO. 1
SELF IMPLEMENTING PLAN
FORMER GRAND RAPIDS METAL PLANT
WYOMING, MICHIGAN

Sample Location			*SB167-11*	*SB173-12*	*SB174-12*	*SB174-12*	*SB174-12*	*SB175-12*	*SB175-12*
Sample Identification		Toxic	*S-17360-092811-EM-058*	*S-17360-042412-EM-071*	*S-17360-042412-EM-064*	*S-17360-042412-EM-065*	*S-17360-042412-EM-066*	*S-17360-042412-EM-057*	*S-17360-042412-EM-058*
Sample Date		Substances	*9/28/2011*	*4/24/2012*	*4/24/2012*	*4/24/2012*	*4/24/2012*	*4/24/2012*	*4/24/2012*
Sample Depth		Control	*(1.5-3.5) ft BGS*	*(2-4) ft BGS*	*(0-2) ft BGS*	*(0-2) ft BGS*	*(2-4) ft BGS*	*(0-2) ft BGS*	*(0-2) ft BGS*
Sample Type		Act [1]				*Duplicate*			*Duplicate*
	Units								
PCBs									
Aroclor-1016 (PCB-1016)	ug/kg	--	35 U	360 U	350 U	350 U	350 U	350 U	350 U
Aroclor-1221 (PCB-1221)	ug/kg	--	35 U	360 U	350 U	350 U	350 U	350 U	350 U
Aroclor-1232 (PCB-1232)	ug/kg	--	35 U	360 U	350 U	350 U	350 U	350 U	350 U
Aroclor-1242 (PCB-1242)	ug/kg	--	35 U	27 J	350 U	350 U	350 U	350 U	350 U
Aroclor-1248 (PCB-1248)	ug/kg	--	35 U	360 U	350 U	350 U	350 U	350 U	350 U
Aroclor-1254 (PCB-1254)	ug/kg	--	35 U	180 J	350 U	350 U	350 U	350 U	350 U
Aroclor-1260 (PCB-1260)	ug/kg	--	35 U	130 J	350 U	350 U	350 U	350 U	350 U
Total PCBs	ug/kg	1000	ND	337 J	ND	ND	ND	ND	ND

Notes:

[1] Cleanup Level of 1 ppm for Bulk PCB Remediation Waste for High Occupancy Areas without further conditions per 40 CFR 761.61(a)(4)(i)(A)

: Exceeds 1 ppm Cleanup Level

U - Not present at or above the associated value.

J - Estimated concentration.

-- Criteria not available

TABLE 3.2

SUMMARY OF ANAYLTICAL RESULTS FOR PCB AREA NO. 1
SELF IMPLEMENTING PLAN
FORMER GRAND RAPIDS METAL PLANT
WYOMING, MICHIGAN

Sample Location			*SB175-12*	*SB176-12*	*SB176-12*
Sample Identification		Toxic	*S-17360-042412-EM-059*	*S-17360-042412-EM-052*	*S-17360-042412-EM-053*
Sample Date		Substances	*4/24/2012*	*4/24/2012*	*4/24/2012*
Sample Depth		Control	*(2-4) ft BGS*	*(1.5-2) ft BGS*	*(2-4) ft BGS*
Sample Type		Act [1]			
	Units				
PCBs					
Aroclor-1016 (PCB-1016)	ug/kg	--	340 U	350 U	350 U
Aroclor-1221 (PCB-1221)	ug/kg	--	340 U	350 U	350 U
Aroclor-1232 (PCB-1232)	ug/kg	--	340 U	350 U	350 U
Aroclor-1242 (PCB-1242)	ug/kg	--	340 U	14 J	350 U
Aroclor-1248 (PCB-1248)	ug/kg	--	340 U	350 U	350 U
Aroclor-1254 (PCB-1254)	ug/kg	--	340 U	350 U	350 U
Aroclor-1260 (PCB-1260)	ug/kg	--	340 U	51 J	24 J
Total PCBs	ug/kg	1000	ND	65 J	24 J

Notes:

[1] Cleanup Level of 1 ppm for Bulk PCB Remediation Waste for High Occupancy Areas without further conditions per 40 CFR 761.61(a)(4)(i)(A)

: Exceeds 1 ppm Cleanup Level

U - Not present at or above the associated value.

J - Estimated concentration.

-- Criteria not available

TABLE 3.3

SUMMARY OF ANALYTICAL RESULTS FOR PCB AREA NO. 2
SELF IMPLEMENTING PLAN
FORMER GRAND RAPIDS METAL PLANT
WYOMING, MICHIGAN

Sample Location			*SB124-11*	*SB124-11*	*SB157-11*	*SB158-11*	*SB159-11*	*SB159-11*	*SB159-11*
Sample Identification		Toxic	*SO-17360-022111-DR-105*	*SO-17360-022111-DR-106*	*S-17360-092711-EM-029*	*S-17360-092711-EM-014*	*S-17360-092711-EM-009*	*S-17360-092711-EM-010*	*S-17360-092711-EM-011*
Sample Date		Substances	*2/21/2011*	*2/21/2011*	*9/27/2011*	*9/27/2011*	*9/27/2011*	*9/27/2011*	*9/27/2011*
Sample Depth		Control	*(1-3) ft BGS*	*(17-19) ft BGS*	*(0.7-2.7) ft BGS*	*(0.5-2.5) ft BGS*	*(0.6-2.6) ft BGS*	*(2.6-4) ft BGS*	*(4-6) ft BGS*
Sample Type		Act [1]							
	Units								
PCBs									
Aroclor-1016 (PCB-1016)	ug/kg	--	340 U	270 U	34 U	33 U	170 U	34 U	34 U
Aroclor-1221 (PCB-1221)	ug/kg	--	340 U	270 U	34 U	33 U	170 U	34 U	34 U
Aroclor-1232 (PCB-1232)	ug/kg	--	340 U	270 U	34 U	33 U	170 U	34 U	34 U
Aroclor-1242 (PCB-1242)	ug/kg	--	340 U	270 U	34 U	33 U	170 U	34 U	34 U
Aroclor-1248 (PCB-1248)	ug/kg	--	340 U	270 U	34 U	33 U	170 U	34 U	34 U
Aroclor-1254 (PCB-1254)	ug/kg	--	1300	270 U	34 U	33 U	1100	34 U	34 U
Aroclor-1260 (PCB-1260)	ug/kg	--	340 U	270 U	34 U	33 U	170 U	34 U	34 U
Total PCBs	ug/kg	1000	**1300**	ND	ND	ND	**1100**	ND	ND

Notes:

Notes:

[1] Cleanup Level of 1 ppm for Bulk PCB Remediation Waste for High Occupancy Areas without further conditions per 40 CFR 761.61(a)(4)(i)(A)

Exceeds 1 ppm Cleanup Level

U - Not present at or above the associated value.

J - Estimated concentration.

-- Criteria not available

TABLE 3.3

SUMMARY OF ANALYTICAL RESULTS FOR PCB AREA NO. 2
SELF IMPLEMENTING PLAN
FORMER GRAND RAPIDS METAL PLANT
WYOMING, MICHIGAN

Sample Location			*SB160-11*	*SB160-11*	*SB161-11*	*SB181-12*	*SB181-12*	*SB184-12*	*SB184-12*
Sample Identification		Toxic	*S-17360-092711-EM-024*	*S-17360-092711-EM-025*	*S-17360-092711-EM-019*	*SO-17360-042312-EB-024*	*SO-17360-042312-EB-025*	*SO-17360-042312-EB-013*	*SO-17360-042312-EB-014*
Sample Date		Substances	*9/27/2011*	*9/27/2011*	*9/27/2011*	*4/23/2012*	*4/23/2012*	*4/23/2012*	*4/23/2012*
Sample Depth		Control	*(0.5-2.5) ft BGS*	*(2.5-4) ft BGS*	*(0.5-2.5) ft BGS*	*(0-2) ft BGS*	*(2-4) ft BGS*	*(0-2) ft BGS*	*(2-4) ft BGS*
Sample Type		Act [1]							
	Units								
PCBs									
Aroclor-1016 (PCB-1016)	ug/kg	--	34 U	34 U	34 U	350 U	340 U	350 U	340 U
Aroclor-1221 (PCB-1221)	ug/kg	--	34 U	34 U	34 U	350 U	340 U	350 U	340 U
Aroclor-1232 (PCB-1232)	ug/kg	--	34 U	34 U	34 U	350 U	340 U	350 U	340 U
Aroclor-1242 (PCB-1242)	ug/kg	--	34 U	34 U	34 U	350 U	340 U	350 U	340 U
Aroclor-1248 (PCB-1248)	ug/kg	--	34 U	34 U	34 U	350 U	340 U	350 U	340 U
Aroclor-1254 (PCB-1254)	ug/kg	--	34 U	34 U	34 U	350 U	340 U	350 U	340 U
Aroclor-1260 (PCB-1260)	ug/kg	--	34 U	34 U	34 U	350 U	5.4 J	350 U	340 U
Total PCBs	ug/kg	1000	ND	ND	ND	ND	5.4 J	ND	ND

Notes:

Notes:

[1] Cleanup Level of 1 ppm for Bulk PCB Remediation Wa
for High Occupancy Areas without further conditions pe
40 CFR 761.61(a)(4)(i)(A)

Exceeds 1 ppm Cleanup Level

U - Not present at or above the associated value.

J - Estimated concentration.

-- Criteria not available

TABLE 3.3

SUMMARY OF ANALYTICAL RESULTS FOR PCB AREA NO. 2
SELF IMPLEMENTING PLAN
FORMER GRAND RAPIDS METAL PLANT
WYOMING, MICHIGAN

Sample Location			*SB185-12*	*SB185-12*	*SB186-12*	*SB186-12*	*SB186-12*	*SB187-12*	*SB187-12*
Sample Identification		Toxic	*SO-17360-042312-EB-008*	*SO-17360-042312-EB-009*	*SO-17360-042312-EB-001*	*SO-17360-042312-EB-002*	*SO-17360-042312-EB-003*	*SO-17360-042312-EB-019*	*SO-17360-042312-EB-020*
Sample Date		Substances	*4/23/2012*	*4/23/2012*	*4/23/2012*	*4/23/2012*	*4/23/2012*	*4/23/2012*	*4/23/2012*
Sample Depth		Control	*(0-2) ft BGS*	*(2-4) ft BGS*	*(0-2) ft BGS*	*(2-4) ft BGS*	*(2-4) ft BGS*	*(0-2) ft BGS*	*(2-4) ft BGS*
Sample Type		Act [1]					*Duplicate*		
	Units								
PCBs									
Aroclor-1016 (PCB-1016)	ug/kg	--	350 U	350 U	1800 U	360 U	360 U	350 U	340 U
Aroclor-1221 (PCB-1221)	ug/kg	--	350 U	350 U	1800 U	360 U	360 U	350 U	340 U
Aroclor-1232 (PCB-1232)	ug/kg	--	350 U	350 U	1800 U	360 U	360 U	350 U	340 U
Aroclor-1242 (PCB-1242)	ug/kg	--	350 U	350 U	1800 U	360 U	360 U	350 U	340 U
Aroclor-1248 (PCB-1248)	ug/kg	--	350 U	350 U	1800 U	360 U	360 U	350 U	340 U
Aroclor-1254 (PCB-1254)	ug/kg	--	350 U	350 U	110 J	50 J	47 J	150 J	340 U
Aroclor-1260 (PCB-1260)	ug/kg	--	350 U	350 U	1800 U	360 U	360 U	350 U	340 U
Total PCBs	ug/kg	1000	ND	ND	110 J	50 J	47 J	150 J	ND

Notes:

Notes:

[1] Cleanup Level of 1 ppm for Bulk PCB Remediation Wa
for High Occupancy Areas without further conditions pe
40 CFR 761.61(a)(4)(i)(A)

Exceeds 1 ppm Cleanup Level

U - Not present at or above the associated value.

J - Estimated concentration.

-- Criteria not available

APPENDIX A

STRATIGRAPHIC SOIL BORING LOGS

STRATIGRAPHIC AND INSTRUMENTATION LOG (OVERBURDEN)

PROJECT NAME: FORMER GRAND RAPIDS METAL PLANT
PROJECT NUMBER: 017360
CLIENT: RACER
LOCATION: WYOMING, MI

HOLE DESIGNATION: SB124-11
DATE COMPLETED: February 21, 2011
DRILLING METHOD: DIRECT PUSH
FIELD PERSONNEL: D. RIVERS

NORTHING: 510664.87
EASTING: 12773559.48

DEPTH ft BGS	STRATIGRAPHIC DESCRIPTION & REMARKS	ELEV. ft	BOREHOLE	SAMPLE NUMBER	SAMPLE INTERVAL	SAMPLE REC (%)	SAMPLE 'N' VALUE	SAMPLE PID (ppm)
	GROUND SURFACE	681.07						
0	CONCRETE	680.27						0.1
2	SP-SAND (FILL), trace silt and fine gravel, compact, fine to coarse grained, poorly graded, brown, moist - fine grained, light brown at 3.0ft BGS			1-3' -105 1MC		80		0.2
4			BACKFILLED WITH BENTONITE CHIPS					
6								0.2
8				2MC		85		0.2
10	SP-SAND (native), trace fine gravel, compact, fine to coarse grained, poorly graded, medium brown, moist - light brown at 9.5ft BGS	672.07						0.3
12	- with fine to coarse gravel at 10.0ft BGS	669.07		3MC		70		
14	SP/GP-SAND AND GRAVEL, compact, fine to coarse sand, fine gravel, poorly graded, medium brown, moist	666.07						0.2
16	SP-SAND, with fine to coarse gravel, compact, fine to coarse grained, poorly graded, light brown, moist - trace fine gravel at 16.0ft BGS							0.2
18				4MC 17-19' -106		70		0.2
20	- fine grained, no gravel, wet at 19.5ft BGS - with fine to coarse gravel, fine to coarse grained at 20.0ft BGS							
22	- trace fine gravel, fine to medium grained, trace coarse grained at 21.0ft BGS							
24								
26	END OF BOREHOLE @ 25.0ft BGS	656.07						
28								
30								
32								
34								

NOTES: MEASURING POINT ELEVATIONS MAY CHANGE; REFER TO CURRENT ELEVATION TABLE

CHEMICAL ANALYSIS ( )

OVERBURDEN LOG 017360-T05WIN.GPJ CRA_CORP.GDT 6/2/11

STRATIGRAPHIC AND INSTRUMENTATION LOG (OVERBURDEN)

PROJECT NAME: FORMER GRAND RAPIDS METAL PLANT
PROJECT NUMBER: 017360
CLIENT: RACER
LOCATION: WYOMING, MI

HOLE DESIGNATION: SB61-11
DATE COMPLETED: February 28, 2011
DRILLING METHOD: DIRECT PUSH
FIELD PERSONNEL: D. RIVERS

NORTHING: 511113.56
EASTING: 12773581.31
GROUND SURFACE 681.06

DEPTH ft BGS	STRATIGRAPHIC DESCRIPTION & REMARKS	ELEV. ft
	WOOD BLOCK FLOOR	680.86
	CONCRETE	680.36
2	SP-SAND (FILL), trace silt, compact, fine grained, poorly graded, brown, moist - trace fine gravel, dark brown at 1.9ft BGS	
4	- orange brown at 3.0ft BGS	
6	- light brown at 6.0ft BGS	
8	- fine to medium grained, trace coarse grained, brown at 8.1ft BGS	
10		
12	SP-SAND (native), trace fine gravel, compact, fine to medium grained, trace coarse grained, poorly graded, tan/beige, moist	669.56
14	- with fine gravel at 13.5ft BGS	
16	- fine grained, trace medium to coarse grained at 16.1ft BGS	
18	- fine to medium grained, trace coarse grained, trace fine to coarse gravel at 17.3ft BGS - with fine gravel, fine to coarse grained at 18.4ft BGS	
20	- trace fine gravel at 18.9ft BGS - wet at 20.0ft BGS	
22	SM-SAND, some silt, compact, fine grained, poorly graded, brown, wet	658.76
24	SP-SAND, trace silt, with fine gravel, compact, fine to coarse grained, poorly graded, brown, wet	657.16 656.06
26	END OF BOREHOLE @ 25.0ft BGS	
28	NOTE: ABANDONED FOLLOWING SAMPLE COLLECTION AND BACKFILLED WITH BENTONITE CHIPS	
30		
32		
34		

TEMP MONITORING WELL

WELL DETAILS
Screened interval:
661.06 to 656.06ft
20.00 to 25.00ft BGS
Length: 5ft

SAMPLE NUMBER	INTERVAL	REC (%)	'N' VALUE	PID (ppm)
1-3' -134				0.2
1MC		85		0.2
				0.2
2MC		75		0.2
				0.2
3MC		70		0.3
				0.5
4MC		90		0.5
18-20' -135				0.4
5MC		80		0.5

NOTES: MEASURING POINT ELEVATIONS MAY CHANGE; REFER TO CURRENT ELEVATION TABLE

CHEMICAL ANALYSIS (1-3' -134, 18-20' -135)

OVERBURDEN LOG 017360-T05WIN.GPJ CRA_CORP.GDT 6/2/11

STRATIGRAPHIC AND INSTRUMENTATION LOG (OVERBURDEN)

PROJECT NAME: FORMER GRAND RAPIDS METAL PLANT
PROJECT NUMBER: 017360
CLIENT: RACER TRUST
LOCATION: WYOMING, MI

HOLE DESIGNATION: SB153-11
DATE COMPLETED: September 28, 2011
DRILLING METHOD: DIRECT PUSH
FIELD PERSONNEL: E. MICKELSON

NORTHING: 511113.46
EASTING: 12773571.84
GROUND SURFACE 681.08

DEPTH ft BGS	STRATIGRAPHIC DESCRIPTION & REMARKS	ELEV. ft	BOREHOLE	SAMPLE NUMBER	SAMPLE INTERVAL	REC (%)	'N' VALUE	PID (ppm)
0	CONCRETE	680.28						
2	SP-SAND, trace silt, compact, fine grained, poorly graded, brown, moist - light tan at 2.9ft BGS - dark brown at 3.5ft BGS - orange brown at 4.4ft BGS		BACKFILLED WITH BENTONITE CHIPS	1-3' -053 1GP		60		0.1
4				3-5' -054				2.0
6				5-7' -055				0.0
8				2GP 7-9' -056		65		0.0
10	END OF BOREHOLE @ 10.0ft BGS	671.08		9-10' -057				
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14								
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34								

NOTES: MEASURING POINT ELEVATIONS MAY CHANGE; REFER TO CURRENT ELEVATION TABLE

CHEMICAL ANALYSIS ( )

OVERBURDEN LOG 017360-T05WIN.GPJ CRA_CORP.GDT 1/12/12

STRATIGRAPHIC AND INSTRUMENTATION LOG (OVERBURDEN)

PROJECT NAME: FORMER GRAND RAPIDS METAL PLANT
PROJECT NUMBER: 017360
CLIENT: RACER TRUST
LOCATION: WYOMING, MI

HOLE DESIGNATION: SB154-11
DATE COMPLETED: September 28, 2011
DRILLING METHOD: DIRECT PUSH
FIELD PERSONNEL: E. MICKELSON

NORTHING: 511123.58
EASTING: 12773581.62
GROUND SURFACE 681.06

DEPTH ft BGS	STRATIGRAPHIC DESCRIPTION & REMARKS	ELEV. ft	BOREHOLE	SAMPLE NUMBER	SAMPLE INTERVAL	SAMPLE REC (%)	SAMPLE 'N' VALUE	SAMPLE PID (ppm)
0	CONCRETE	680.56						
2	SP-SAND, trace silt and fine gravel, compact, fine grained, poorly graded, orange brown, moist			0.5-2.5' -038				0.0
				1GP		50		
4	- brown from 3.5 to 3.9ft BGS			2.5-4' -039				0.0
			BACKFILLED WITH BENTONITE CHIPS	4-6' -040				
6								0.0
				6-8' -041 2GP		60		
8								
	- with medium gravel at 9.1ft BGS			8-10' -042				0.0
10	END OF BOREHOLE @ 10.0ft BGS	671.06						
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34								

NOTES: MEASURING POINT ELEVATIONS MAY CHANGE; REFER TO CURRENT ELEVATION TABLE

CHEMICAL ANALYSIS ( )

OVERBURDEN LOG 017360-T05WIN.GPJ CRA_CORP.GDT 1/12/12

STRATIGRAPHIC AND INSTRUMENTATION LOG (OVERBURDEN)

PROJECT NAME: FORMER GRAND RAPIDS METAL PLANT
PROJECT NUMBER: 017360
CLIENT: RACER TRUST
LOCATION: WYOMING, MI

HOLE DESIGNATION: SB155-11
DATE COMPLETED: September 28, 2011
DRILLING METHOD: DIRECT PUSH
FIELD PERSONNEL: E. MICKELSON

NORTHING: 511102.95
EASTING: 12773581.65

DEPTH ft BGS	STRATIGRAPHIC DESCRIPTION & REMARKS	ELEV. ft	BOREHOLE	SAMPLE NUMBER	SAMPLE INTERVAL	SAMPLE REC (%)	SAMPLE 'N' VALUE	SAMPLE PID (ppm)
	GROUND SURFACE	681.03						
0	CONCRETE	680.53						
2	SP-SAND, trace silt, compact, fine grained, poorly graded, light brown, moist			0.5-2.5' -048				0.0
				1GP		50		
4	- orange brown from 3.9 to 4.0ft BGS - orange brown at 4.1ft BGS			2.5-4' -049				0.1
			BACKFILLED WITH BENTONITE CHIPS	4-6' -050				
6								0.0
				6-8' -051				
8				2GP		70		
				8-10' -052				0.0
10	END OF BOREHOLE @ 10.0ft BGS	671.03						
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NOTES: MEASURING POINT ELEVATIONS MAY CHANGE; REFER TO CURRENT ELEVATION TABLE

CHEMICAL ANALYSIS

OVERBURDEN LOG 017360-T05WIN.GPJ CRA_CORP.GDT 1/12/12

STRATIGRAPHIC AND INSTRUMENTATION LOG (OVERBURDEN)

PROJECT NAME: FORMER GRAND RAPIDS METAL PLANT
PROJECT NUMBER: 017360
CLIENT: RACER TRUST
LOCATION: WYOMING, MI

HOLE DESIGNATION: SB156-11
DATE COMPLETED: September 28, 2011
DRILLING METHOD: DIRECT PUSH
FIELD PERSONNEL: E. MICKELSON

NORTHING: 511112.63
EASTING: 12773581.4

DEPTH ft BGS	STRATIGRAPHIC DESCRIPTION & REMARKS	ELEV. ft	BOREHOLE	SAMPLE NUMBER	SAMPLE INTERVAL	SAMPLE REC (%)	SAMPLE 'N' VALUE	SAMPLE PID (ppm)
	GROUND SURFACE	681.04						
0	CONCRETE	680.54						
2	SP-SAND, trace silt, compact, fine grained, poorly graded, brown, moist			0.5-2.5' -043				1.2
				1GP		50		
4	- orange brown at 3.8ft BGS			2.5-4' -044				0.0
			BACKFILLED WITH BENTONITE CHIPS	4-6' -045				
6								0.0
				6-8' -046				
8				2GP		70		
				8-10' -047				0.0
10	END OF BOREHOLE @ 10.0ft BGS	671.04						
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34								

NOTES: MEASURING POINT ELEVATIONS MAY CHANGE; REFER TO CURRENT ELEVATION TABLE

CHEMICAL ANALYSIS

STRATIGRAPHIC AND INSTRUMENTATION LOG (OVERBURDEN)

PROJECT NAME: FORMER GRAND RAPIDS METAL PLANT
PROJECT NUMBER: 017360
CLIENT: RACER TRUST
LOCATION: WYOMING, MI

HOLE DESIGNATION: SB157-11
DATE COMPLETED: September 27, 2011
DRILLING METHOD: DIRECT PUSH
FIELD PERSONNEL: E. MICKELSON

NORTHING: 510674.12
EASTING: 12773559.28

DEPTH ft BGS	STRATIGRAPHIC DESCRIPTION & REMARKS	ELEV. ft	BOREHOLE	SAMPLE NUMBER	SAMPLE INTERVAL	SAMPLE REC (%)	SAMPLE 'N' VALUE	SAMPLE PID (ppm)
	GROUND SURFACE	681.07						
0	CONCRETE	680.37						
2	SP-SAND, trace silt, compact, fine grained, poorly graded, orange brown, moist			0.7-2.7' -029 1GP		50		0.0
4	- few medium gravel from 4.0 to 4.5ft BGS			2.7-5' -030				0.0
6			BACKFILLED WITH BENTONITE CHIPS	2GP 5-7' -031		60		0.0
7	- REFUSAL at 7.0ft BGS	674.07						
8	END OF BOREHOLE @ 7.0ft BGS							

NOTES: MEASURING POINT ELEVATIONS MAY CHANGE; REFER TO CURRENT ELEVATION TABLE

CHEMICAL ANALYSIS ( )

OVERBURDEN LOG 017360-T05WIN.GPJ CRA_CORP.GDT 1/12/12

STRATIGRAPHIC AND INSTRUMENTATION LOG (OVERBURDEN)

PROJECT NAME: FORMER GRAND RAPIDS METAL PLANT
PROJECT NUMBER: 017360
CLIENT: RACER TRUST
LOCATION: WYOMING, MI

HOLE DESIGNATION: SB158-11
DATE COMPLETED: September 27, 2011
DRILLING METHOD: DIRECT PUSH
FIELD PERSONNEL: E. MICKELSON

NORTHING: 510654.99
EASTING: 12773560.11

DEPTH ft BGS	STRATIGRAPHIC DESCRIPTION & REMARKS	ELEV. ft	BOREHOLE	SAMPLE NUMBER	SAMPLE INTERVAL	SAMPLE REC (%)	SAMPLE 'N' VALUE	SAMPLE PID (ppm)
	GROUND SURFACE	681.04						
0	CONCRETE	680.54						
0	SP-SAND, trace silt, compact, fine grained, poorly graded, orange brown, moist			0.5-2.5' -014				0.0
2				1GP 2.5-4' -015		60		0.0
4	- black, potential fly-ash, lightweight from 3.5 to 3.7ft BGS		BACKFILLED WITH BENTONITE CHIPS	4-6' -016				0.0
6				6-8' -017 2GP		70		0.0
8				8-10' -018				0.0
10	END OF BOREHOLE @ 10.0ft BGS	671.04						
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30								
32								
34								

NOTES: MEASURING POINT ELEVATIONS MAY CHANGE; REFER TO CURRENT ELEVATION TABLE

CHEMICAL ANALYSIS

STRATIGRAPHIC AND INSTRUMENTATION LOG (OVERBURDEN)

PROJECT NAME: FORMER GRAND RAPIDS METAL PLANT
PROJECT NUMBER: 017360
CLIENT: RACER TRUST
LOCATION: WYOMING, MI

HOLE DESIGNATION: SB159-11
DATE COMPLETED: September 27, 2011
DRILLING METHOD: DIRECT PUSH
FIELD PERSONNEL: E. MICKELSON

NORTHING: 510664.63
EASTING: 12773549.59

DEPTH ft BGS	STRATIGRAPHIC DESCRIPTION & REMARKS	ELEV. ft	BOREHOLE	SAMPLE NUMBER	SAMPLE INTERVAL	SAMPLE REC (%)	SAMPLE 'N' VALUE	SAMPLE PID (ppm)
	GROUND SURFACE	681.05						
0	CONCRETE	680.45						
2	SP-SAND, trace silt, compact, fine grained, poorly graded, light brown, moist - rock debris from 2.1 to 2.3ft BGS			0.6-2.6' -009 1GP 2.6-4' -010		70		0.0 0.0
4	- trace fine gravel from 4.1 to 4.4ft BGS		BACKFILLED WITH BENTONITE CHIPS	4-6' -011				0.0
6				6-8' -012 2GP		60		0.0
8				8-10' -013				0.0
10	END OF BOREHOLE @ 10.0ft BGS	671.05						
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32								
34								

NOTES: MEASURING POINT ELEVATIONS MAY CHANGE; REFER TO CURRENT ELEVATION TABLE

CHEMICAL ANALYSIS ⬭

STRATIGRAPHIC AND INSTRUMENTATION LOG (OVERBURDEN)

PROJECT NAME: FORMER GRAND RAPIDS METAL PLANT
PROJECT NUMBER: 017360
CLIENT: RACER TRUST
LOCATION: WYOMING, MI

HOLE DESIGNATION: SB160-11
DATE COMPLETED: September 27, 2011
DRILLING METHOD: DIRECT PUSH
FIELD PERSONNEL: E. MICKELSON

NORTHING: 510664.8
EASTING: 12773559.48

GROUND SURFACE 681.04

DEPTH ft BGS	STRATIGRAPHIC DESCRIPTION & REMARKS	ELEV. ft	BOREHOLE	SAMPLE NUMBER	SAMPLE INTERVAL	SAMPLE REC (%)	SAMPLE 'N' VALUE	SAMPLE PID (ppm)
0	CONCRETE	680.54						
2	SP-SAND, trace silt, compact, fine grained, poorly graded, orange brown, moist			0.5-2.5' -024				0.0
				1GP		70		
4	- black, potential fly-ash, lightweight from 3.5 to 3.6ft BGS			2.5-4' -025				0.0
			BACKFILLED WITH BENTONITE CHIPS	4-6' -026				
6								0.0
				6-8' -027 2GP		65		
8								0.0
				8-10' -028				
10	END OF BOREHOLE @ 10.0ft BGS	671.04						
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14								
16								
18								
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30								
32								
34								

NOTES: MEASURING POINT ELEVATIONS MAY CHANGE; REFER TO CURRENT ELEVATION TABLE

CHEMICAL ANALYSIS

OVERBURDEN LOG 017360-T05WIN.GPJ CRA_CORP.GDT 1/12/12

STRATIGRAPHIC AND INSTRUMENTATION LOG (OVERBURDEN)

PROJECT NAME: FORMER GRAND RAPIDS METAL PLANT
PROJECT NUMBER: 017360
CLIENT: RACER TRUST
LOCATION: WYOMING, MI

HOLE DESIGNATION: SB161-11
DATE COMPLETED: September 27, 2011
DRILLING METHOD: DIRECT PUSH
FIELD PERSONNEL: E. MICKELSON

NORTHING: 510664.98
EASTING: 12773570.64
GROUND SURFACE ELEV. ft: 681.09

DEPTH ft BGS	STRATIGRAPHIC DESCRIPTION & REMARKS	ELEV. ft	BOREHOLE	SAMPLE NUMBER	SAMPLE INTERVAL	SAMPLE REC (%)	SAMPLE 'N' VALUE	SAMPLE PID (ppm)
0	CONCRETE	680.59						
2	SP-SAND, trace silt, compact, fine grained, poorly graded, orange brown, moist			0.5-2.5' -019				0.0
				1GP		75		
4	- black, potential fly-ash, lightweight from 3.5 to 3.7ft BGS			2.5-4' -020				0.0
			BACKFILLED WITH BENTONITE CHIPS	4-6' -021				
6								0.0
				6-8' -022 2GP		80		
8								
				8-10' -023				0.0
10	END OF BOREHOLE @ 10.0ft BGS	671.09						
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28								
30								
32								
34								

NOTES: MEASURING POINT ELEVATIONS MAY CHANGE; REFER TO CURRENT ELEVATION TABLE

CHEMICAL ANALYSIS ( )

OVERBURDEN LOG 017360-T05WIN.GPJ CRA_CORP.GDT 1/12/12

STRATIGRAPHIC AND INSTRUMENTATION LOG (OVERBURDEN)

PROJECT NAME: FORMER GRAND RAPIDS METAL PLANT
PROJECT NUMBER: 017360
CLIENT: RACER TRUST
LOCATION: WYOMING, MI

HOLE DESIGNATION: SB173-12
DATE COMPLETED: April 24, 2012
DRILLING METHOD: ROTOSONIC
FIELD PERSONNEL: E. MICKELSON

DEPTH ft BGS	STRATIGRAPHIC DESCRIPTION & REMARKS	ELEV. ft	BOREHOLE	SAMPLE NUMBER	SAMPLE INTERVAL	SAMPLE REC (%)	SAMPLE 'N' VALUE	SAMPLE PID (ppm)
	NORTHING: 511103.6 EASTING: 12773588.4 GROUND SURFACE	681.10						
0	CONCRETE							0.0
2	SP-SAND, trace fine gravel and silt, compact fine grained, poorly graded, dark brown, moist	679.60	BACKFILLED WITH BENTONITE CHIPS	1RS (2-4' -071)				
4	- REFUSAL at 4.0ft BGS END OF BOREHOLE @ 4.0ft BGS	677.10						0.0
6								
8								
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12								
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26								
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30								
32								
34								

NOTES: MEASURING POINT ELEVATIONS MAY CHANGE; REFER TO CURRENT ELEVATION TABLE

CHEMICAL ANALYSIS ( )

OVERBURDEN LOG 017360-T05WIN.GPJ CRA_CORP.GDT 6/1/12

STRATIGRAPHIC AND INSTRUMENTATION LOG (OVERBURDEN)

PROJECT NAME: FORMER GRAND RAPIDS METAL PLANT
PROJECT NUMBER: 017360
CLIENT: RACER TRUST
LOCATION: WYOMING, MI

HOLE DESIGNATION: SB174-12
DATE COMPLETED: April 24, 2012
DRILLING METHOD: ROTOSONIC
FIELD PERSONNEL: E. MICKELSON

NORTHING: 511103.5
EASTING: 12773571.3
GROUND SURFACE 680.80

DEPTH ft BGS	STRATIGRAPHIC DESCRIPTION & REMARKS	ELEV. ft	BOREHOLE	SAMPLE NUMBER	SAMPLE INTERVAL	SAMPLE REC (%)	SAMPLE 'N' VALUE	SAMPLE PID (ppm)
0	CONCRETE	680.30		0-2' -064/ 065				0.0
2	SP-SAND, trace fine gravel and silt, compact, fine grained, poorly graded, brown, moist - 1" thick piece of slag at 1.8ft BGS		BACKFILLED WITH BENTONITE CHIPS	1RS 2-4' -066				0.0
4	- no gravel, light brown at 4.7ft BGS			4-6' -067/ 068				0.0
6				6-8' -069 2RS				0.0
8	- with fine gravel at 9.3ft BGS			8-10' -070				
10	END OF BOREHOLE @ 10.0ft BGS	670.80						
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14								
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32								
34								

NOTES: MEASURING POINT ELEVATIONS MAY CHANGE; REFER TO CURRENT ELEVATION TABLE

CHEMICAL ANALYSIS ( )

OVERBURDEN LOG 017360-T05WIN.GPJ CRA_CORP.GDT 6/1/12

STRATIGRAPHIC AND INSTRUMENTATION LOG (OVERBURDEN)

PROJECT NAME: FORMER GRAND RAPIDS METAL PLANT
PROJECT NUMBER: 017360
CLIENT: RACER TRUST
LOCATION: WYOMING, MI

HOLE DESIGNATION: SB175-12
DATE COMPLETED: April 24, 2012
DRILLING METHOD: ROTOSONIC
FIELD PERSONNEL: E. MICKELSON

NORTHING: 511123.6
EASTING: 12773571.3

GROUND SURFACE 681.00

DEPTH ft BGS	STRATIGRAPHIC DESCRIPTION & REMARKS	ELEV. ft	BOREHOLE	SAMPLE NUMBER	SAMPLE INTERVAL	SAMPLE REC (%)	SAMPLE 'N' VALUE	SAMPLE PID (ppm)
0	CONCRETE	680.50	BACKFILLED WITH BENTONITE CHIPS	0-2' -057/ 058				0.0
2	SP-SAND, trace fine gravel and silt, compact, fine grained, poorly graded, brown, moist			1RS 2-4' -059				
4	- no gravel, light brown at 4.0ft BGS			4-6' -060				0.0
6				6-8' -061 2RS				0.0
8				8-10' -062/ 063				0.0
10	- trace gravel, brown at 9.8ft BGS	671.00						
	END OF BOREHOLE @ 10.0ft BGS							
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34								

NOTES: MEASURING POINT ELEVATIONS MAY CHANGE; REFER TO CURRENT ELEVATION TABLE

CHEMICAL ANALYSIS ( )

OVERBURDEN LOG 017360-T05WIN.GPJ CRA_CORP.GDT 6/1/12

STRATIGRAPHIC AND INSTRUMENTATION LOG (OVERBURDEN)

PROJECT NAME: FORMER GRAND RAPIDS METAL PLANT
PROJECT NUMBER: 017360
CLIENT: RACER TRUST
LOCATION: WYOMING, MI

HOLE DESIGNATION: SB176-12
DATE COMPLETED: April 24, 2012
DRILLING METHOD: ROTOSONIC
FIELD PERSONNEL: E. MICKELSON

NORTHING: 511123.5
EASTING: 12773591.3

DEPTH ft BGS	STRATIGRAPHIC DESCRIPTION & REMARKS	ELEV. ft	BOREHOLE	SAMPLE NUMBER	SAMPLE INTERVAL	SAMPLE REC (%)	SAMPLE 'N' VALUE	SAMPLE PID (ppm)
	GROUND SURFACE	681.40						
0	CONCRETE							
		679.90						0.0
2	SP-SAND, with fine gravel, trace silt, compact, fine grained, poorly graded, brown, moist - shards of glass at 2.8ft BGS		BACKFILLED WITH BENTONITE CHIPS	1.5-2' -052 1RS 2-4' -053				0.0
4				4-6' -054				0.0
6	- 0.03" small black slag seam at 7.2ft BGS			6-8' -055 2RS				0.0
8				8-10' -056				0.0
10	END OF BOREHOLE @ 10.0ft BGS	671.40						
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30								
32								
34								

NOTES: MEASURING POINT ELEVATIONS MAY CHANGE; REFER TO CURRENT ELEVATION TABLE

CHEMICAL ANALYSIS ( )

OVERBURDEN LOG 017360-T05WIN.GPJ CRA_CORP.GDT 6/1/12

STRATIGRAPHIC AND INSTRUMENTATION LOG (OVERBURDEN)

PROJECT NAME: FORMER GRAND RAPIDS METAL PLANT
PROJECT NUMBER: 017360
CLIENT: RACER TRUST
LOCATION: WYOMING, MI

HOLE DESIGNATION: SB181-12
DATE COMPLETED: April 23, 2012
DRILLING METHOD: ROTOSONIC
FIELD PERSONNEL: E. BATENBURG

NORTHING: 510654.8
EASTING: 12773569.5

DEPTH ft BGS	STRATIGRAPHIC DESCRIPTION & REMARKS	ELEV. ft	BOREHOLE	SAMPLE NUMBER	SAMPLE INTERVAL	SAMPLE REC (%)	SAMPLE 'N' VALUE	SAMPLE PID (ppm)
	GROUND SURFACE	681.00						
0	CONCRETE	680.50		0-2' -024				0.1
2	SP-SAND, trace fine gravel, compact, fine grained, poorly graded, dark brown, moist - trace cinders and coarse gravel at 2.0ft BGS		BACKFILLED WITH BENTONITE CHIPS	1DP 2-4' -025		75		0.2
4	- 6" layer of slag, cinders, coal fragments, black at 3.6ft BGS - light brown at 4.0ft BGS			4-6' -026				0.3
6				6-8' -027 2DP		60		0.1
8				8-10' -028				0.2
10	- trace silt at 9.5ft BGS END OF BOREHOLE @ 10.0ft BGS	671.00						
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14								
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32								
34								

NOTES: MEASURING POINT ELEVATIONS MAY CHANGE; REFER TO CURRENT ELEVATION TABLE

CHEMICAL ANALYSIS ( )

OVERBURDEN LOG 017360-T05WIN.GPJ CRA_CORP.GDT 6/1/12

STRATIGRAPHIC AND INSTRUMENTATION LOG (OVERBURDEN)

PROJECT NAME: FORMER GRAND RAPIDS METAL PLANT
PROJECT NUMBER: 017360
CLIENT: RACER TRUST
LOCATION: WYOMING, MI

HOLE DESIGNATION: SB184-12
DATE COMPLETED: April 23, 2012
DRILLING METHOD: ROTOSONIC
FIELD PERSONNEL: E. BATENBURG

NORTHING: 510664.8
EASTING: 12773539.5
GROUND SURFACE ELEV. ft: 681.00

DEPTH ft BGS	STRATIGRAPHIC DESCRIPTION & REMARKS	ELEV. ft
0	CONCRETE	680.50
2	SP-SAND, trace fine gravel, compact, fine grained, poorly graded, brown, moist - dark brown at 2.5ft BGS	
4	- trace coarse gravel, light brown at 3.5ft BGS - 2.5" seam of slag, cinders, coal fragments, black at 4.0ft BGS	
6		
8	- trace silt at 7.5ft BGS	
10	END OF BOREHOLE @ 10.0ft BGS	671.00
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16		
18		
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22		
24		
26		
28		
30		
32		
34		

BOREHOLE: BACKFILLED WITH BENTONITE CHIPS

SAMPLE NUMBER	INTERVAL	REC (%)	'N' VALUE	PID (ppm)
0-2' -013				0.1
1DP 2-4' -014		60		0.1
4-6' -015				0.7
6-8' -016/ 017' 2DP		75		0.3
8-10' -018				0.2

NOTES: MEASURING POINT ELEVATIONS MAY CHANGE; REFER TO CURRENT ELEVATION TABLE

CHEMICAL ANALYSIS ( )

OVERBURDEN LOG 017360-T05WIN.GPJ CRA_CORP.GDT 6/1/12

STRATIGRAPHIC AND INSTRUMENTATION LOG (OVERBURDEN)

PROJECT NAME: FORMER GRAND RAPIDS METAL PLANT
PROJECT NUMBER: 017360
CLIENT: RACER TRUST
LOCATION: WYOMING, MI

HOLE DESIGNATION: SB185-12
DATE COMPLETED: April 23, 2012
DRILLING METHOD: ROTOSONIC
FIELD PERSONNEL: E. BATENBURG

NORTHING: 510674.8
EASTING: 12773539.4
GROUND SURFACE ELEV. ft: 681.10

DEPTH ft BGS	STRATIGRAPHIC DESCRIPTION & REMARKS	ELEV. ft	BOREHOLE	SAMPLE NUMBER	SAMPLE INTERVAL	SAMPLE REC (%)	SAMPLE 'N' VALUE	SAMPLE PID (ppm)
0	CONCRETE	680.60		0-2' -008				0.2
2	SP-SAND, trace fine and coarse gravel, compact, fine grained, poorly graded, brown, moist		BACKFILLED WITH BENTONITE CHIPS	1DP 2-4' -009		60		0.2
4	- trace coal fragments at 3.0ft BGS - light brown at 4.0ft BGS			4-6' -010				0.1
6	- brown at 5.0ft BGS - trace cinders, slag, coal fragments at 6.0ft BGS			6-8' -011 2DP		75		0.8
8	- trace silt, light brown at 6.5ft BGS			8-10' -012				0.3
10	END OF BOREHOLE @ 10.0ft BGS	671.10						
12								
14								
16								
18								
20								
22								
24								
26								
28								
30								
32								
34								

NOTES: MEASURING POINT ELEVATIONS MAY CHANGE; REFER TO CURRENT ELEVATION TABLE

CHEMICAL ANALYSIS ( )

OVERBURDEN LOG 017360-T05WIN.GPJ CRA_CORP.GDT 6/1/12

STRATIGRAPHIC AND INSTRUMENTATION LOG (OVERBURDEN)

PROJECT NAME: FORMER GRAND RAPIDS METAL PLANT
PROJECT NUMBER: 017360
CLIENT: RACER TRUST
LOCATION: WYOMING, MI

HOLE DESIGNATION: SB186-12
DATE COMPLETED: April 23, 2012
DRILLING METHOD: ROTOSONIC
FIELD PERSONNEL: E. BATENBURG

NORTHING: 510674.8
EASTING: 12773549.4

DEPTH ft BGS	STRATIGRAPHIC DESCRIPTION & REMARKS	ELEV. ft	BOREHOLE	SAMPLE NUMBER	SAMPLE INTERVAL	SAMPLE REC (%)	SAMPLE 'N' VALUE	SAMPLE PID (ppm)
	GROUND SURFACE	681.00						
0	CONCRETE	680.50		0-2' -001				0.2
2	SP-SAND, fine and coarse gravel, compact, poorly graded, brown, moist		BACKFILLED WITH BENTONITE CHIPS	1DP 2-4' -002/ 003		25		0.3
4	- dark brown from 4.5 to 5.0ft BGS			4-6' -004/ 005				0.7
6				6-8' -006 2DP		25		0.4
8	- trace coal fragments, dark brown and black coal smears, possible fly ash at 7.5ft BGS - light brown at 8.0ft BGS			8-10' -007				0.1
10	END OF BOREHOLE @ 10.0ft BGS	671.00						
12								
14								
16								
18								
20								
22								
24								
26								
28								
30								
32								
34								

NOTES: MEASURING POINT ELEVATIONS MAY CHANGE; REFER TO CURRENT ELEVATION TABLE

CHEMICAL ANALYSIS ( )

OVERBURDEN LOG 017360-T05WIN.GPJ CRA_CORP.GDT 6/1/12

STRATIGRAPHIC AND INSTRUMENTATION LOG (OVERBURDEN)

PROJECT NAME: FORMER GRAND RAPIDS METAL PLANT
PROJECT NUMBER: 017360
CLIENT: RACER TRUST
LOCATION: WYOMING, MI

HOLE DESIGNATION: SB187-12
DATE COMPLETED: April 23, 2012
DRILLING METHOD: ROTOSONIC
FIELD PERSONNEL: E. BATENBURG

NORTHING: 510674.8
EASTING: 12773569.5

GROUND SURFACE 681.00

DEPTH ft BGS	STRATIGRAPHIC DESCRIPTION & REMARKS	ELEV. ft	BOREHOLE	SAMPLE NUMBER	SAMPLE INTERVAL	SAMPLE REC (%)	SAMPLE 'N' VALUE	SAMPLE PID (ppm)
0	CONCRETE	680.50		0-2' -019				0.2
2	SP-SAND, trace fine gravel, compact, fine grained, poorly graded, brown, moist - trace cinders and slag at 2.5ft BGS - 1" seam of black slag, coal fragments and cinders at 3.0ft BGS - 3" seam of black slag, coal fragments and cinders at 3.5ft BGS - light brown at 3.7ft BGS - brown at 5.0ft BGS		BACKFILLED WITH BENTONITE CHIPS	1DP 2-4' -020		85		0.5
4				4-6' -021				0.3
6								
8				6-8' -022 2DP		50		0.0
10	END OF BOREHOLE @ 10.0ft BGS	671.00		8-10' -023				0.1
12								
14								
16								
18								
20								
22								
24								
26								
28								
30								
32								
34								

NOTES: MEASURING POINT ELEVATIONS MAY CHANGE; REFER TO CURRENT ELEVATION TABLE

CHEMICAL ANALYSIS ( )

OVERBURDEN LOG 017360-T05WIN.GPJ CRA_CORP.GDT 6/1/12

APPENDIX B

WASTE DISPOSAL DOCUMENTATION

NON-HAZARDOUS MANIFEST

WASTE MANAGEMENT

NON-HAZARDOUS MANIFEST | 1. Generator's US EPA ID No. | Manifest Doc No. | 2. Page 1 of 1

3. Generator's Mailing Address:
RACER TRUST
300 36TH STREET SW
GRAND RAPIDS, MI 49548

4. Generator's Phone 217-741-6235

Generator's Site Address (If different than mailing):
RACER TRUST
300 36TH STREET SW
GRAND RAPIDS, MI 49548
KENT COUNTY

A. Manifest Number WMNA T 69636

B. State Generator's ID

5. Transporter 1 Company Name Cordes #293

6. US EPA ID Number

C. State Transporter's ID
D. Transporter's Phone

7. Transporter 2 Company Name

8. US EPA ID Number

E. State Transporter's ID
F. Transporter's Phone

9. Designated Facility Name and Site Address
Autumn Hills Landfill
700 56th Ave
Zeeland, MI 49464

10. US EPA ID Number

G. State Facility ID
H. State Facility Phone 616-688-5777

GENERATOR

11. Description of Waste Materials	12. Containers No.	12. Containers Type	13. Total Quantity	14. Unit Wt./Vol.	I. Misc. Comments
a. PCB Impacted Soils WM Profile # 110321MI	1	Truck	45649	Kg	
b. WM Profile #					
c. WM Profile #					
d. WM Profile #					

J. Additional Descriptions for Materials Listed Above
Color: Brown to grey, No Odor, Solid
OSD 8/22/12
Load 001

K. Disposal Location
Cell | Level
Grid

15. Special Handling Instructions and Additional Information

Purchase Order # 40-4048767 EMERGENCY CONTACT / PHONE NO.: James VanAssche/ 734-453-5123

16. GENERATOR'S CERTIFICATE:
I hereby certify that the above-described materials are not hazardous wastes as defined by CFR Part 261 or any applicable state law, have been fully and accurately described, classified and packaged and are in proper condition for transportation according to applicable regulations.

Printed Name	Signature "On behalf of"	Month	Day	Year
Earl Batenburg	RACER TRUST	8	22	12

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed Name	Signature	Month	Day	Year
Rick Simons		8	22	12

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed Name	Signature	Month	Day	Year

FACILITY

19. Certificate of Final Treatment/Disposal
I certify, on behalf of the above listed treatment facility, that to the best of my knowledge, the above-described waste was managed in compliance with all applicable laws, regulations, permits and licenses on the dates listed above.

20. Facility Owner or Operator: Certification of receipt of non-hazardous materials covered by this manifest.

Printed Name	Signature	Month	Day	Year
Barb VanDam		8	22	12

White- TREATMENT, STORAGE, DISPOSAL FACILITY COPY
Blue- GENERATOR #2 COPY
Yellow- GENERATOR #1 COPY
Pink- FACILITY USE ONLY
Gold- TRANSPORTER #1 COPY

NON-HAZARDOUS MANIFEST

WASTE MANAGEMENT

NON-HAZARDOUS MANIFEST	1. Generator's US EPA ID No.	Manifest Doc No.	2. Page 1 of 1	

3. Generator's Mailing Address:
RACER TRUST
300 36TH STREET SW
GRAND RAPIDS, MI 49548
4. Generator's Phone 217-741-6235

Generator's Site Address (If different than mailing):
RACER TRUST
300 36TH STREET SW
GRAND RAPIDS, MI 49548
KENT COUNTY

A. Manifest Number: WMNA T 69615
B. State Generator's ID

5. Transporter 1 Company Name	6. US EPA ID Number	C. State Transporter's ID
Cordes F293		D. Transporter's Phone
7. Transporter 2 Company Name	8. US EPA ID Number	E. State Transporter's ID
		F. Transporter's Phone
9. Designated Facility Name and Site Address	10. US EPA ID Number	G. State Facility ID
Autumn Hills Landfill 700 56th Ave Zeeland, MI 49464		H. State Facility Phone 616-688-5777

GENERATOR

11. Description of Waste Materials	12. Containers No.	12. Containers Type	13. Total Quantity	14. Unit Wt./Vol.	I. Misc. Comments
a. PCB Impacted Soils	1	Truck	40633	Kg	
WM Profile # 110321MI					
b.					
WM Profile #					
c.					
WM Profile #					
d.					
WM Profile #					

J. Additional Descriptions for Materials Listed Above
Color: Brown to grey, No Odor, Solid
OSD 8/22/12
Load 003

K. Disposal Location
Cell | Level
Grid

15. Special Handling Instructions and Additional Information

Purchase Order # 40-4048767 EMERGENCY CONTACT / PHONE NO.: James VanAssche/ 734-453-5123

16. GENERATOR'S CERTIFICATE:
I hereby certify that the above-described materials are not hazardous wastes as defined by CFR Part 261 or any applicable state law, have been fully and accurately described, classified and packaged and are in proper condition for transportation according to applicable regulations.

Printed Name	Signature "On behalf of"	Month	Day	Year
Earl Batenburg	RACER TRUST	8	22	12

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials				
Printed Name	Signature	Month	Day	Year
Rick Simons		8	22	12
18. Transporter 2 Acknowledgement of Receipt of Materials				
Printed Name	Signature	Month	Day	Year

FACILITY

19. Certificate of Final Treatment/Disposal
I certify, on behalf of the above listed treatment facility, that to the best of my knowledge, the above-described waste was managed in compliance with all applicable laws, regulations, permits and licenses on the dates listed above.

20. Facility Owner or Operator: Certification of receipt of non-hazardous materials covered by this manifest.

Printed Name	Signature	Month	Day	Year
Barb VanDam		8	22	12

White- TREATMENT, STORAGE, DISPOSAL FACILITY COPY Blue- GENERATOR #2 COPY Yellow- GENERATOR #1 COPY

Pink- FACILITY USE ONLY Gold- TRANSPORTER #1 COPY

NON-HAZARDOUS MANIFEST

WASTE MANAGEMENT

NON-HAZARDOUS MANIFEST

1. Generator's US EPA ID No. Manifest Doc No.

2. Page 1 of

A. Manifest Number WMNA T 69635

B. State Generator's ID

GENERATOR

3. Generator's Mailing Address:
RACER TRUST
300 36TH STREET SW
GRAND RAPIDS, MI 49548

4. Generator's Phone 217-741-6235

Generator's Site Address (If different than mailing):
RACER TRUST
300 36TH STREET SW
GRAND RAPIDS, MI 49548
KENT COUNTY

5. Transporter 1 Company Name: Cordes

6. US EPA ID Number

C. State Transporter's ID

D. Transporter's Phone

7. Transporter 2 Company Name

8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address
Autumn Hills Landfill
700 56th Ave
Zeeland, MI 49464

10. US EPA ID Number

G. State Facility ID

H. State Facility Phone 616-688-5777

11. Description of Waste Materials	12. Containers No.	12. Containers Type	13. Total Quantity	14. Unit Wt./Vol.	I. Misc. Comments
a. PCB Impacted Soils WM Profile # 110321MI	1	Truck	49124	Kg	
b. WM Profile #					
c. WM Profile #					
d. WM Profile #					

J. Additional Descriptions for Materials Listed Above

Color: Brown to grey, No Odor, Solid
CRD 8/22/12
LOAD 002

K. Disposal Location

Cell | Level
Grid

15. Special Handling Instructions and Additional Information

Purchase Order # 40-4048767 EMERGENCY CONTACT / PHONE NO.: James VanAssche/ 734-453-5123

16. GENERATOR'S CERTIFICATE:
I hereby certify that the above-described materials are not hazardous wastes as defined by CFR Part 261 or any applicable state law, have been fully and accurately described, classified and packaged and are in proper condition for transportation according to applicable regulations.

Printed Name	Signature "On behalf of"	Month	Day	Year
Earl Baterbury	RACER TRUST	8	22	12

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed Name	Signature	Month	Day	Year
Al Rook		8	22	12

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed Name	Signature	Month	Day	Year

FACILITY

19. Certificate of Final Treatment/Disposal
I certify, on behalf of the above listed treatment facility, that to the best of my knowledge, the above-described waste was managed in compliance with all applicable laws, regulations, permits and licenses on the dates listed above.

20. Facility Owner or Operator: Certification of receipt of non-hazardous materials covered by this manifest

Printed Name	Signature	Month	Day	Year
Barb VanDam		8	22	12

White- TREATMENT, STORAGE, DISPOSAL FACILITY COPY Blue- GENERATOR #2 COPY Yellow- GENERATOR #1 COPY

Pink- FACILITY USE ONLY Gold- TRANSPORTER #1 COPY

Customer Summary Report
Criteria: 08/08/2012 12:00 AM to 09/05/2012 11:59 PM
Business Unit Name: Autumn Hills Landfill - S03730 (USA)
Date: Sep 05 2012, 1:42:30 PM - Central Standard Time
Profile: 110321MI

Ticket Date	Ticket ID	Customer	Generator	Manifest	Truck	Material
8/22/2012	360567	CRA	129-RACERTRUST300	T69636	CON293-15	Cont Soil Sp. W.-Tons
8/22/2012	360582	CRA	129-RACERTRUST300	t69635	CON101-53	Cont Soil Sp. W.-Tons
8/22/2012	360603	CRA	129-RACERTRUST300	T69615	CON293-15	Cont Soil Sp. W.-Tons
Material Total	3					

Origin	Rate	Rate Unit	Rate Qty	Yards	Tons	Material Revenue	Tax Revenue	Surcharge Revenue	Total
MI-KENT	$13.00	TON	56.19	40	56.19	$730.47	$0.00	$386.96	$1,117.43
MI-KENT	$13.00	TON	60.98	40	60.98	$792.74	$0.00	$418.66	$1,211.40
MI-KENT	$13.00	TON	50.01	40	50.01	$650.13	$0.00	$346.07	$996.20
			167.18	120	167.18	$2,173.34	$0.00	$1,151.69	$3,325.03

NON-HAZARDOUS MANIFEST

WASTE MANAGEMENT

NON-HAZARDOUS MANIFEST | 1. Generator's US EPA ID No. | Manifest Doc No. | 2. Page 1 of 1

3. Generator's Mailing Address:
RACER TRUST
~~300 36TH STREET SW~~ 2930 Ecorse Rd
~~GRAND RAPIDS, MI 49548~~ Ypsilanti, MI 48198
4. Generator's Phone 217-741-6235

Generator's Site Address (If different than mailing):
RACER TRUST
300 36TH STREET SW
GRAND RAPIDS, MI 49548
KENT COUNTY

A. Manifest Number: WMNA T 69617
B. State Generator's ID

5. Transporter 1 Company Name: ER 21 K+D Industrial Services
6. US EPA ID Number: MID 072790 710
C. State Transporter's ID: mi-275
D. Transporter's Phone: 616-784-8900

7. Transporter 2 Company Name
8. US EPA ID Number
E. State Transporter's ID
F. Transporter's Phone

9. Designated Facility Name and Site Address
Autumn Hills Landfill
700 56th Ave
Zeeland, MI 49464
10. US EPA ID Number
G. State Facility ID
H. State Facility Phone 616-688-5777

GENERATOR

11. Description of Waste Materials	12. Containers No.	12. Containers Type	13. Total Quantity	14. Unit Wt./Vol.	I. Misc. Comments
a. PCB Impacted Soils	1	DM	363	Kg	(55 gal)
WM Profile # 110321MI					
b.					
WM Profile #					
c.					
WM Profile #					
d.					
WM Profile #					

J. Additional Descriptions for Materials Listed Above
Color: Brown to grey, No Odor, Solid
O.S.D. 4/12/13
Load 001

K. Disposal Location
Cell | Level
Grid

15. Special Handling Instructions and Additional Information

Purchase Order # ~~40-4048767~~ EB 40-4057407
EMERGENCY CONTACT / PHONE NO.: ~~James VanAssche/ 734-453-5123~~

16. GENERATOR'S CERTIFICATE:
I hereby certify that the above-described materials are not hazardous wastes as defined by CFR Part 261 or any applicable state law, have been fully and accurately described, classified and packaged and are in proper condition for transportation according to applicable regulations.

Printed Name: Earl Batenburg | Signature "On behalf of" RACER TRUST | Month 4 | Day 12 | Year 13

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed Name: Kevin Simpson | Signature | Month 4 | Day 12 | Year 13

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed Name | Signature | Month | Day | Year

FACILITY

19. Certificate of Final Treatment/Disposal
I certify, on behalf of the above listed treatment facility, that to the best of my knowledge, the above-described waste was managed in compliance with all applicable laws, regulations, permits and licenses on the dates listed above.

20. Facility Owner or Operator: Certification of receipt of non-hazardous materials covered by this manifest
Printed Name: Barb VanDam | Signature: B VanDam | Month 4 | Day 12 | Year 13

White- TREATMENT, STORAGE, DISPOSAL FACILITY COPY | Blue- GENERATOR #2 COPY | Yellow- GENERATOR #1 COPY
Pink FACILITY USE ONLY | Gold TRANSPORTER #1 COPY