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ATTACHMENT I

Figure 1 – “Property Location Map”
Figure 2 – “Boring Location Plan”
Figure 3 – “Log of Geoprobes”
Figure 4 – “Soil Boring Locations with Soil Analytical Results”
Figure 5 – “Soil Boring Locations with Groundwater Analytical Results”
Tru-Line Surveying PC Survey

ATTACHMENT II

Table 1a – Soil Samples Collected December 20, 2010 Compared to Residential
Table 1b – Soil Samples Collected December 20, 2010 Compared to Non-Residential
Table 2 – Groundwater Samples Collected December 20, 2010
1.0 INTRODUCTION

On behalf of Kent County Republican Committee, the future Operator (Operator), and 725 Lake Michigan Drive, LLC, the Owner (Developer), NTH Consultants, Ltd. (NTH) has prepared this Due Care Plan for the property located at 725 Lake Michigan Drive, NW in Grand Rapids, Kent County, Michigan (property). The preparation of this Due Care Plan is funded by the City of Grand Rapids through a Brownfield Assessment Grant awarded to the City of Grand Rapids by the US Environmental Protection Agency (USEPA). The property is also identified by Parcel No. 41-13-25-152-017. The approximate location of the property is shown on Figure No. 1 “Property Location Map” in Attachment I. The limits of the property are shown on a survey of the property by Tru-Line Surveying P.C. in Attachment I.

The property is located in a mixed residential and commercial use area of Grand Rapids, bordered by Lake Michigan Drive to the south and National Avenue to the west. Figure No. 2 “Boring Location Plan” in Attachment I depicts the property relative to surrounding areas. The source of Figure 2 is an aerial photograph obtained from the Grand Valley Metropolitan Council Geographic Information System website.

The Developer acquired the property January 13, 2011. On that same date, the Developer sold the property. The future operations by the Developer and/or Operator will not involve the storage or use of hazardous substances. The Developer and Operator submitted Baseline Environmental Assessments (BEAs) to the Michigan Department of Environmental Quality (MDEQ) on June 10, 2011.

The purpose of the Due Care Plan is to assist the Developer and the Operator, with satisfying “due care” obligations described in Section 20107a of Part 201 (Environmental Remediation) of the Michigan Natural Resources and Environmental Protection Act (1994 P.A. 451, as amended), and in compliance with associated Administrative Rules R299.51001-R299.51021, effective December 21, 2002.

Section 20107a applies to owners and operators who have knowledge that their property is a “facility” as defined by Part 201. The term facility is defined as any area, place, or property where a hazardous substance is present in concentrations greater than the Part 201 Generic Residential Cleanup Criteria. Pursuant to Part 201, Section 7a(1) requires that a person who owns or operates property that he/she has knowledge is a “facility” do the following:
• To undertake measures to prevent exacerbation of existing contamination;
• To exercise due care by undertaking response activity necessary to mitigate unacceptable exposure to hazardous substances and allow for the intended use of the property in a manner that protects the public health and safety; and
• To take reasonable precautions against the reasonably foreseeable acts or omissions of a third party and the consequences that could result from those acts or omissions.
• To provide reasonable cooperation, assistance, and access to the persons that are authorized to conduct response activities at the facility, including the cooperation and access necessary for the installation, integrity, operation, and maintenance of any complete or partial response activity at the facility. Nothing in this subdivision shall be interpreted to provide any right of access not expressly authorized by law, including access authorized pursuant to a warrant or a court order, or to preclude access allowed pursuant to a voluntary agreement.
• To comply with any land use or resource use restrictions established or relied on in connection with the response activities at the facility.
• To not impede the effectiveness or integrity of any land use or resource use restriction employed at the facility in connection with response activities.

The Operator has the following initial and future plans for the property:

• Remodel the existing building interior for office space; and
• Potentially resurface existing parking and update landscape areas.

This Due Care Plan provides guidelines for meeting “due care” obligations during future occupancy of the property. Additionally, general guidelines for meeting due care obligations during construction activities are also included.
2.0 DETAILED CHARACTERISTICS OF PROPERTY USE

This section provides details on the current and proposed uses of the property.

2.1 Current Property Use

The property is approximately 0.40 acres in size and contains one slab-on-grade building that is comprised of brick masonry and metal-siding. According to the property survey, the building’s footprint is approximately 6,200 square-feet. The portion of the property not covered by the building is largely asphalt and concrete covered with a few grass areas.

2.2 Proposed Future Use

The Developer will own the title to the property until such time as the operator pays in full the amount due under the land contract. The Operator will utilize the building as commercial office space. Operation by the Developer and Operator will not involve the storage or use of hazardous substances.

2.3 Proposed Construction Activities

No current construction activities are planned for the property except as described in Section 3.5.2.

3.0 HAZARDOUS SUBSTANCE INFORMATION

This section describes the known environmental conditions on the property, including the nature and extent of hazardous substances identified, and presents an exposure pathway evaluation.

3.1 Summary of Environmental Studies

Data on environmental conditions at the property were developed through a Phase I Environmental Site Assessment (ESA) and a Baseline Environmental Assessment (BEA) performed at the property. These studies are briefly summarized below. Refer to the referenced reports for additional details.
3.1.1 Phase I ESA

NTH performed a Phase I ESA study on the property, the results of which are presented in a report dated January 2, 2011. The Phase I ESA was conducted through the City of Grand Rapids’ Brownfield Assessment Grant from the USEPA. As discussed in the Phase I ESA, the following evidence of recognized environmental conditions (RECs) associated with the property were identified:

- Several former residential structures occupied the Property and on at least three previous occasions existing structures were demolished and new structures built. No structural or demolition records on the former structures could be obtained from reasonably ascertainable historical records. It is unclear whether or not the former structures had basements, and if so, how the basements were filled (i.e., no information available regarding the environmental nature or origin of the fill materials.) If basements were present, then the environmental nature and origin of the fill soil used to backfill the basement excavations is unknown. Urban fill often contains elevated concentrations of heavy metals and petroleum constituents.

Due to the above RECs, a Phase II ESA study was implemented to evaluate potential impacts to the property.

3.1.2 Phase II Environmental Site Assessment

NTH performed a Phase II ESA at the property to evaluate each REC identified during the Phase I ESA. The results of this study are summarized below.

The Phase II ESA consisted of advancing four (4) soil borings, designated as B-1 through B-4, at the approximate locations depicted on the Boring Location Plan, Figure 2 in Attachment I. These boring locations were selected, to assess possible locations of demolished former structures. Subsurface conditions observed at each explored location are presented on the Log of Geoprobes, Figure 3, in the BEA report.

The subsurface conditions at the property consist of topsoil and/or asphalt followed by fill comprised of varying amounts of sand, gravel, organics, concrete and debris. The fill was underlain by sand and clay layers to a maximum explored depth of 16 feet below ground surface (bgs). Groundwater was encountered at one boring location at a depth of approximately 7 feet bgs.
Soil samples collected from the borings were submitted for laboratory analysis for volatile organic compounds (VOCs), polynuclear aromatic hydrocarbons (PNAs) and Michigan 10 metals. The analytical results were compared to Michigan Department of Environmental Quality (MDEQ) established residential cleanup criteria (Generic Residential Soil Cleanup Criteria, Table 2, published in MDEQ RD Op Memo No. 1, Attachment 1, dated March 25, 2011, which have been established pursuant to 1994 P.A. 451, Part 201, as amended (Part 201).

The groundwater sample collected from B-2 was submitted for laboratory analysis for VOCs, PNAs and Michigan 10 metals. The analytical results were compared to MDEQ established residential cleanup criteria (Generic Residential Groundwater Cleanup Criteria, Table 1, published in MDEQ RD Op Memo No. 1, Attachment 1, dated March 25, 2011), which have been established pursuant to Part 201. There were insufficient quantities of groundwater available for additional laboratory analysis.

The results of hazardous substances concentrations detected in the soil and groundwater sample analyses along with the applicable Part 201 criteria are summarized in Tables 1 and 2, respectively in Attachment II.

3.2 Hazardous Substances Identification

For the purposes of this Due Care Plan, contaminant concentrations have been compared to the following generic soil and groundwater cleanup criteria for residential and/or non-residential land use established pursuant to Part 201:

- Generic Groundwater Cleanup Criteria for all categories (i.e. residential and non-residential), Table 1 in MDNRE-Remediation and Redevelopment Division (RRD) Operational Memorandum No. 1, Attachment 1, dated January 23, 2006 (R 299.5744).
- Generic Soil Cleanup Criteria for the residential category, Table 2 in MDNRE-RRD Operational Memorandum No. 1, Attachment 1, dated January 23, 2006 (R 299.5744).
- Generic Soil Cleanup Criteria for the non-residential category, Table 3 in MDNRE-RRD Operational Memorandum No. 1, Attachment 1, dated January 23, 2006 (R 299.5744).
The BEA at the property confirmed the presence of hazardous substances at concentrations above applicable Part 201 Generic Residential Cleanup Criteria (GRCC) in soil samples. Soil contaminants detected are summarized on Table 1 and Table 2 in Attachment II, and summarized below.

<table>
<thead>
<tr>
<th>Contaminant</th>
<th>CAS Number</th>
<th>Sample Location</th>
<th>Highest Concentration</th>
<th>Residential Criteria Exceeded</th>
<th>Non-Residential Criteria Exceeded</th>
</tr>
</thead>
<tbody>
<tr>
<td>Benzo(a)pyrene</td>
<td>50328</td>
<td>B-3 (2-3’)</td>
<td>9,100</td>
<td>Direct Contact</td>
<td>Direct Contact</td>
</tr>
<tr>
<td>Fluoranthene</td>
<td>206440</td>
<td>B-3 (2-3’)</td>
<td>25,000</td>
<td>GSIP</td>
<td>GSIP</td>
</tr>
<tr>
<td>Phenanthrene</td>
<td>85018</td>
<td>B-3 (2-3’)</td>
<td>27,000</td>
<td>GSIP</td>
<td>GSIP</td>
</tr>
<tr>
<td>Mercury</td>
<td>7439976</td>
<td>B-1 (6-7’) and B-3 (2-3’)</td>
<td>400</td>
<td>GSIP</td>
<td>GSIP</td>
</tr>
<tr>
<td>Selenium</td>
<td>7782492</td>
<td>B-2 (6-7’)</td>
<td>730</td>
<td>GSIP</td>
<td>GSIP</td>
</tr>
</tbody>
</table>

GSIP – Groundwater Surface Water Interface Protection

NTH’s Phase II ESA at the property confirmed the presence of the following hazardous substances in groundwater samples above applicable Part 201 residential criteria:

<table>
<thead>
<tr>
<th>Contaminant</th>
<th>CAS Number</th>
<th>Sample Location</th>
<th>Highest Concentration</th>
<th>Residential Criteria Exceeded</th>
<th>Non-Residential Criteria Exceeded</th>
</tr>
</thead>
<tbody>
<tr>
<td>Lead</td>
<td>7439921</td>
<td>B-2W</td>
<td>98</td>
<td>DWC, GSI</td>
<td>DWC, GSI</td>
</tr>
<tr>
<td>Zinc</td>
<td>7440666</td>
<td>B-2W</td>
<td>170</td>
<td>GSI</td>
<td>GSI</td>
</tr>
</tbody>
</table>

DWC – Drinking Water Criteria

GSI – Groundwater Surface Water Interface Criteria

As noted above, Figure 4 “Soil Boring Locations with Soil Analytical Results” and Figure 5 “Soil Boring Locations with Groundwater Analytical Results” in Attachment I depict the boring locations and a brief summary of hazardous substances detected in analyzed samples. Since the above-listed compounds are present above the applicable Part 201 generic residential cleanup criteria, the property is considered a “facility.”

According to Section 20101(1)(a) of Part 201 of NREPA (1994 P.A. 451, as amended), “facility means any area, place, or property where a hazardous substance in excess of the concentrations which satisfy the requirements of Section 20120a(1)(a) or (17) or the cleanup criteria for unrestricted residential use under Part 213 has been released, deposited, disposed of, or otherwise comes to be located. Facility does not include any area, place, or property at which response activities have been completed which satisfy the cleanup criteria for the residential category provided for in section 20120a(1)(a) and (17) or at which corrective action has been completed under Part 213 which satisfies cleanup criteria for unrestricted residential use.”
3.3 Environmental Conditions

This section discusses the current and previous environmental conditions at the property.

3.3.1 Free Product
Based on the Phase I ESA, free product was not previously present on the property. Based on the soil and groundwater sampling conducted for the BEA, free product is not currently present on the property.

3.3.2 Free Phase Liquids
Based on the Phase I ESA, free phase liquids were not previously present on the property. Based on the soil and groundwater sampling conducted for the BEA, free phase liquids are not currently present on the property.

3.3.3 Soil Contamination above any Residential Criteria
Based on the Phase I ESA, soil contamination above any residential criteria was not previously assessed on the property. Based on the soil sampling conducted for the BEA, soil contamination above any residential criteria is present on the property as discussed in Section 3.2.

3.3.4 Soil Contamination above any Non-Residential Criteria
Based on the Phase I ESA, soil contamination above any non-residential criteria was not previously assessed on the property. Based on the soil sampling conducted for the BEA, soil contamination above any non-residential criteria is present on the property as discussed in Section 3.2.

3.3.5 Soil Aesthetic Impacts
Based on the Phase I ESA, soil aesthetic impacts were not previously assessed on the property. Based on the soil sampling conducted for the BEA, soil aesthetic impacts are present on the property due to the stained soils noted on the Log of Geoprobes at two boring locations.

3.3.6 Groundwater Contamination above any Residential Criteria
Based on the Phase I ESA, groundwater contamination above residential criteria was not previously assessed on the property. Based on the groundwater sampling conducted for the BEA, groundwater contamination above residential criteria is present on the property as discussed in Section 3.2.
3.3.7 Groundwater Contamination above any Non-Residential Criteria

Based on the Phase I ESA, groundwater contamination above non-residential criteria was not previously assessed on the property. Based on the groundwater sampling conducted for the BEA, groundwater contamination above non-residential criteria is present on the property as discussed in Section 3.2.

3.3.8 Groundwater Contamination above Acute Inhalation Screening Level

Based on the Phase I ESA, groundwater contamination above the acute inhalation screening level was not previously assessed on the property. Based on the groundwater sampling conducted for the BEA, groundwater contamination above the acute inhalation screening level is not present on the property as discussed in Section 3.2.

3.3.9 Groundwater Aesthetic Impacts

Based on the Phase I ESA, groundwater aesthetic impacts were not previously assessed on the property. Based on the groundwater sampling conducted for the BEA, groundwater aesthetic impacts are not present on the property due to the fact that odors were not noted during groundwater sampling.

3.3.10 Soil Gas Contamination Above Residential Screening Levels

Based on the Phase I ESA, soil gas contamination above residential criteria was not previously assessed on the property. Based on the soil and groundwater sampling conducted for the BEA, soil gas contamination above residential criteria is not present on the property due to the fact that residential Soil Volatilization to Indoor Air Inhalation Criteria (SVIIC) and residential Groundwater Volatilization to Indoor Air Inhalation Criteria (GVIIC) were not exceeded as discussed in Section 3.2.

3.3.11 Soil Gas Contamination Above Non-Residential Screening Levels

Based on the Phase I ESA, soil gas contamination above non-residential criteria was not previously assessed on the property. Based on the soil and groundwater sampling conducted for the BEA, soil gas contamination above non-residential criteria is not present on the property due to the fact that non-residential SVIIC and non-residential GVIIC were not exceeded as discussed in Section 3.2.
3.3.12 Conditions Immediately Dangerous to Life and Health

Based on the Phase I ESA, conditions immediately dangerous to life and health were not previously assessed on the property. Based on the soil and groundwater sampling conducted for the BEA, conditions immediately dangerous to life and health are not present on the property based on the chemical concentrations as discussed in Section 3.2.

3.3.13 Fire & Explosion Hazards Related to Releases

Based on the Phase I ESA, fire and explosion hazards related to releases were not previously assessed on the property. Based on the soil and groundwater sampling conducted for the BEA, fire and explosion hazards related to releases are not present on the property based on the chemical concentrations as discussed in Section 3.2.

3.3.14 Contamination Existing in Drinking Water Supply

Based on the Phase I ESA, contamination existing in drinking water supply was not previously assessed on the property. Based on the soil and groundwater sampling conducted for the BEA, contamination existing in drinking water supply was not assessed during the BEA sampling. According to the Phase I ESA the nearest Drinking Water Supply Well is located over 1 mile away from the property.

3.3.15 Imminent Threat to Drinking Water Supply

Based on the Phase I ESA, contamination existing in drinking water supply was not previously assessed on the property. Based on the soil and groundwater sampling conducted for the BEA, contamination existing in drinking water supply was not assessed during the BEA sampling. According to the Phase I ESA the nearest Drinking Water Supply Well is located over 1 mile away from the property.

3.4 Environmental Media

3.4.1 Soil

Soil is known to be affected at the property based on the soil samples collected for the BEA (Table No. 1a and 1b, Attachment I).
3.4.2 **Groundwater**  
Groundwater is known to be affected at the property based on the groundwater samples collected for the BEA (Table No. 2, Attachment I).

3.4.3 **Soil Vapor**  
Soil Vapor was not directly assessed during BEA activities; however, soil and groundwater contamination detected at the property are below their respective volatilization to indoor air and ambient air criteria.

3.4.4 **Surface Water**  
Surface water was not assessed during the BEA activities; the nearest surface water body, the Grand River, is over 0.5 miles east of the Property thus making it unlikely that contamination from the property will reach the water body.

3.4.5 **Surface Water Sediments**  
Surface water sediments were not assessed during the BEA activities; the nearest surface water body, the Grand River, is over 0.5 miles east of the Property thus making it unlikely that contamination from the property will reach the water body.

3.5 **Exposure Pathway Evaluation**  
Based on available information, contaminated subsurface soils and groundwater have been detected on the property resulting from either historic use and storage of hazardous substances, or use of contaminated fill material. The following assessment of potential human exposure pathways is based on existing conditions and the plans for future construction and redevelopment activities proposed for the property.

In accordance with MDEQ Operational Memorandum No. 1 dated December 10, 2004, a pathway is considered *relevant* when the exposure route exists, even if exposure controls are or will be relied upon to prevent exposure, and even if detected contaminant concentrations are less than applicable criteria. Based on observed surface and subsurface conditions, the location of the property, and our review of readily available geologic and hydrogeologic data, none of the exposure pathways evaluated can be eliminated, or considered
irrelevant. An exposure pathway is considered *applicable* if the exposure pathway is relevant and is not reliably restricted by a restrictive covenant or other allowed mechanism.

### 3.5.1 Evaluation of Potentially Applicable Exposure Pathways

**Groundwater Ingestion (DWC and DWP):** This pathway relates to contaminants dissolved in the groundwater, or chemicals absorbed on the soil being dissolved into water passing through the impacted soil, leaching the contaminants from the soil into the groundwater, and groundwater being drawn from the ground and ingested as drinking water. This pathway is *not likely to be applicable* to this property because it is serviced by a municipal water supply and the contaminated soil is located within the building footprint. Additionally, there will be no use of groundwater during future operation of the property or during construction activities.

**Groundwater Volatilization to Indoor Air Criteria (GVIIC):** This pathway accounts for vapor to be inhaled by people present on the Property. Groundwater is present beneath the onsite building. Future construction activities, including building rehabilitation, are currently planned on the property. This pathway is *applicable* to the property. However, no volatile compounds have been detected in samples collected at the property above GVIIC.

**Groundwater Contact Criteria (GCC):** This pathway accounts for human dermal contact with contaminated groundwater. Groundwater was encountered at the Property at a depth of approximately 7 below the ground surface. Future construction activities, including excavation, are not currently planned on the property. The building is planned to be remodeled without subsurface disturbances. It is possible that excavations, especially utility repair work could be completed at the property in the future. This pathway is *applicable* to the property.

**Groundwater-Surface Water Interface / Protection (GSI and GSIP) Criteria:** This pathway involves migration of contaminants through the groundwater or chemicals absorbed on the soil being dissolved into water passing through the impacted soil, and venting to a surface water body or wetland. On-site and nearby stormwater drains discharge through the cities stormwater system to the Grand River; therefore, this pathway is *applicable* to the property.
**Soil Direct Contact Criteria (DCC):** This pathway accounts for human dermal contact with or ingestion of contaminated soil. The property is currently covered by buildings and paved areas. Future construction activities, including excavation, are not currently planned on the property, but are possible by others, e.g. utility repairs. Therefore, this pathway is applicable to the property.

**Soil Volatilization to Indoor Air Criteria (SVIIC):** This pathway relates to contaminants volatilizing from the soil and migrating through the vadose zone soils, accumulating in an enclosed space such as a basement, building, utility trench etc., and then being inhaled by an occupant of the property. This pathway is applicable to the property. However, no volatile compounds have been detected in samples collected at the property above SVIIC.

**Soil Volatilization to Ambient Air (VSIC):** This pathway considers contaminants volatilizing from contaminated soils, migrating to the ground surface through vadose zone soils, venting to the atmosphere, and then being inhaled by people. This pathway is applicable to the property. However, no volatile compounds have been detected in samples collected at the property above VSIC.

**Soil Particulate Inhalation Criteria (PSIC):** This exposure pathway accounts for chemicals being absorbed onto soil particles and those contaminated particles becoming airborne and inhaled by people. This pathway is applicable to the property. However, no compounds have been detected in samples collected at the property above PSIC.

### 3.5.2 Applicable Land Use Category

The Operator intends to remodel the existing structure into office areas. The parking area may be re-paved. Until the property is redeveloped, the Operator intends to secure the building to prevent trespassers and will post signs around the property stating that trespassing is prohibited and the property is contaminated. No chemicals will be used or stored at the property.

During construction at the property, construction workers will be performing various activities. No excavations are planned, however, future site work, including utility work, may include excavations. During construction activities, access to the affected portions of the property will be restricted by fencing and/or security. For these
types of activities, the land use category and receptors are considered non-residential in nature due to the restricted access to the public and relatively short duration of their work.

For evaluating potential future exposure pathways to contamination at the property, generic residential and non-residential generic cleanup criteria have been considered.

### 3.5.3 Known Contamination and Potential Exposure Pathways

Based on the contaminants and contaminant concentrations detected at the property, an evaluation of the relevant and applicable exposure pathways, and the proposed land use, the following exposure pathways are potentially complete at the property:

- Soil Direct Contact (DCC)
- Groundwater Ingestion and Contact (DWP and DWC)
- GSI Protection (GSIP and GSI)

The locations of the soil and groundwater samples with contaminant concentrations are depicted on Figures No. 4 and 5 in Attachment I, and the contamination concentrations are reported in Tables 1 and 2 in Attachment II.

### 4.0 PLAN FOR RESPONSE ACTIVITIES

This section provides a plan for response activities to satisfy the Operator’s obligations under Section 20107a and the associated Part 201 Administrative Rules. Response activities are based on the current property conditions and the Developer plans to remodel the building for commercial office space.

As outlined in the previous section, hazardous substances were detected at levels exceeding applicable MDEQ generic cleanup criteria. Based on anticipated construction activities and intended future use of the property, response activities will be performed to 1) prevent exacerbation of contamination, 2) mitigate potential exposures, and 3) take reasonable precautions. Response actions are summarized below for both the occupancy phase and the potential future construction phase at the property:
<table>
<thead>
<tr>
<th>Criterion Exceeded</th>
<th>Hazardous Substance(s) Exceeding Criteria</th>
<th>Response to Assess or Mitigate Potential Exposures (Post Construction Phase)</th>
<th>Response to Assess or Mitigate Potential Exposures (Construction Phase)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Residential / Non-Residential DWC/DWP</td>
<td>Lead</td>
<td>Property is serviced by municipal water supply. Restrict all non-environmental monitoring well installations on the property via restrictive covenant.</td>
<td>Property is serviced by municipal water supply; groundwater use at the property will be restricted.</td>
</tr>
<tr>
<td>GSI/GSIP</td>
<td>Fluoranthene, Phenanthrene, Mercury, Selenium</td>
<td>Maintain capped areas to reduce precipitation infiltration.</td>
<td>Require that new utilities near or below the groundwater table be impervious to water infiltration.</td>
</tr>
<tr>
<td>DCC</td>
<td>Benzo(a)pyrene</td>
<td>Maintain capped areas or landscape to reduce direct contact with soil.</td>
<td>Require contractor to have a health and safety plan. Minimize workers contact with soil. Limit site access.</td>
</tr>
</tbody>
</table>

### 4.1 Description of Response Activities

The Operator plans to remodel the existing building, and potentially re-surface the parking areas. These activities are not anticipated to involve excavations into the soil or groundwater.

### 4.2 Construction Health and Safety Plan

The General Contractor will develop and implement a Health and Safety Plan (HASP) in accordance with regulatory requirements including the Occupational Safety and Health Act of 1970, 29 CFR 1910.120 and the Michigan Occupational Safety and Health Act.

### 4.3 Soil Excavation / Relocation Activities

The property is a facility and as such excavated soils will be managed in accordance with Section 20120c of Part 201. All excavated soils and other materials should be appropriately managed, such that:

- Contaminated materials that must be removed from the property will be transported for disposal at a licensed disposal facility, after proper characterization testing.
- If it is necessary to stockpile contaminated soil on the property prior to disposal, it will be placed/stored in a predetermined location, as selected by the Developer or its authorized representative(s). The staging area(s) are limited to impermeable area or those areas containing soil contaminated with similar types and similar concentrations of hazardous substances. Clean areas are not to be used for staging of contaminated materials without placement of impervious barriers between the in-place soils.
and the temporarily stockpiled contaminated materials. Stockpiled materials are to be covered with appropriate material to mitigate fugitive dust and runoff due to precipitation.

- Off the property disposal activities will be recorded with appropriate documentation, including, but not limited to: manifests, trucking logs, landfill weigh tickets, or other documentation.
- Prior to leaving the property, trucks and other equipment will be brushed clean of dirt, as appropriate. If brushing is not sufficient to remove excess dirt and dust, then additional cleaning procedures may be necessary, such as the use of high-pressure steam washing using potable water. If necessary, decontamination will take place at the fringe of identified contaminated zones.
- Open excavation areas will be sprayed with a dust suppressant as often as needed to prevent airborne dispersion of dust, unless the areas are wet, snow-covered, or frozen.
- If construction plans call for soil relocation off the property, then the Developer will provide the MDEQ notification of the following within 14 days of the soil relocation:
  - Location from which the soil was removed,
  - Location at which the soil was disposed,
  - Approximate volume of soil removed,
  - The basis on which a determination was made that the soil does not present a threat to public health, safety, or welfare or the environment, and

Excavation and backfill for activities such as utility construction shall be done in a manner consistent with generally accepted engineering practices.

### 4.4 Groundwater and Stormwater Management

New utilities at the property are not planned to be installed below the groundwater table and therefore groundwater should not be encountered during potential future construction activities. Additionally, as the Operator’s future construction plans include the remodel of the structure and resurfacing of the parking areas, there should be no excavations that would encounter groundwater. If it becomes necessary for construction crews to perform deep excavations, then groundwater will be appropriately managed, if encountered.

If it becomes necessary to implement dewatering on the property, then the water will be managed in accordance with applicable regulations. Any significant quantity of groundwater will be sampled and analyzed
in order to characterize the water for appropriate disposal. Based on the analytical results, recommendations and disposal options will be determined. Disposal options may consist of, but are not limited to, the following:

- Direct discharge to storm or sanitary sewer systems,
- On property treatment prior to discharge, or
- Collection and transport as liquid industrial waste off property for treatment and disposal.

Should stormwater accumulate within an excavation such that dewatering becomes necessary, then the accumulated stormwater shall be managed as described above for groundwater.

4.5 Release of Hazardous Materials from Construction Use

Temporary containers of hazardous substances that constitute significant use may be brought on the property during typical construction activities, such as fuels for construction vehicles. Construction related hazardous substances will be stored with secondary containment to prevent spillage from impacting the property. Temporary fuel tanks will have secondary spill containment. If there is a release of hazardous materials on the property from usage during construction activities (e.g., released from temporary storage tanks, etc.), actions consistent with requirements of Part 31 (Water Resources Protection), Part 201, Part 111 (Hazardous Waste Management), and / or Part 115 (Solid Waste Management), as applicable, may be implemented, including:

- Stop or prevent the release at its source,
- Determine the extent and severity of the release;
- Identify and eliminate threats of fire or explosion, or direct contact hazards;
- Report the release to the owner or their authorized representative;
- Report the release, if subject to reportable quantities, to the MDNRE project coordinator or, if unavailable, the Pollution Emergency Alerting System (PEAS: 1-800-292-4706); and
- Pursue immediate response activities necessary to achieve applicable cleanup criteria.

If there is a failure of the secondary containment or similar feature identified above and if a release occurs as a result of the failure, the BEA previously prepared for this property does not provide an exemption to liability for response activity necessary to address contamination resulting from the failure. Cleanup of the release
attributable to failure of the containment controls will be the responsibility of the person(s) who caused the release.

4.6 Previously Known and Unknown Contamination and Abandoned Containers

If evidence of previously unknown contamination is encountered during future construction activities, such as staining or discolored soil, chemical odors, and/or the presence of fill material, then this Plan may need to be modified. Contamination that may be encountered will be characterized and managed in accordance with applicable provisions of Part 201, Part 111, Part 115, and / or if appropriate, Part 213 (Leaking Underground Storage Tanks) of Act 451. Impacted soils will be characterized in-place or will be properly staged in a designated area until characterization is completed and appropriate disposal or relocation options are determined. Additionally, appropriate response actions will immediately be taken to prevent, abate, or minimize a release or threat of release.

USTs, drums, or other containers that may be encountered during construction activities will be emptied of their contents (if any) and / or removed and disposed as appropriate. Prior to removal, the contents will be characterized in order to determine proper management and disposal requirements. Characterization, removal, remediation, verification, closure, and additional management activities, as appropriate and necessary, will be conducted in accordance with applicable requirements, guidelines, and rules of state and federal law, including, Part 111, Part 115, Part 121 (Liquid Industrial Waste), Part 201, and Part 213 of Act 451; 40 CFR 261 and 262 of the Resource Conservation and Recovery Act; and the Toxic Substance Control Act (40 CFR 761).

4.7 Notifications

As circumstances warrant, the Developer will provide a written notice, by a method that provides proof of delivery, of the general nature and extent of contamination on the property and potential unacceptable exposures to all of the following (R 299.51013(6)):

- Easement holders of record
- Utility franchise holders of record
- Owners or operators of public utilities that serve the property
Adjacent property owners
The MDEQ

The property is serviced by City of Grand Rapids for storm and sanitary sewers and for municipal water. Consumer’s Energy supplies natural gas and electric to the property.

4.8 Post-Closure Plan

4.8.1 CAP Inspection and Maintenance
The Developer has the responsibility to monitor and maintain the cap on the property. The asphalt parking area surface will be maintained. Any disturbance or removal of the asphalt cap must be replaced within 14 days of completing the work that required the disturbance.

The Developer will have the responsibility to ensure that the asphalt cap is inspected and maintained. Inspections will be performed at least twice per year. The inspection will include visual observations to determine whether the cap has eroded such that the underlying soil is visible.

If damage or disturbance of the cover material is noted during inspections, routine landscaping maintenance, or at any other time, the cover materials will be reapplied to the necessary thickness to match cap specifications. Written records of inspections and any repairs will be maintained indefinitely.

4.8.2 Restrictive Covenant Against Groundwater Usage Onsite
A Restrictive Covenant (RC) preventing onsite groundwater usage will need to be instituted for the Property. The RC would be in accordance with the current MDEQ requirements and restrictions pursuant to Section 20114c(3) of Part 201, Environmental Remediation, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (NREPA), MCL 324.20101 et seq.

Pursuant to Section 20114c(5) of Part 201, a copy of the recorded Declaration of Restrictive Covenant shall be provided to the Michigan Department of Environmental Quality within 30 days after recording with the appropriate Register of Deeds. The responsibility for maintaining compliance with this Plan remains with the owner.
5.0 COMPLIANCE WITH SECTION 7A OBLIGATIONS

5.1 Exacerbation [Sec. 7(a)(1)]
Neither the Operator nor the Developer will exacerbate existing contamination during future construction activities or during the intended future use. Compliance with this Plan will result in the following response activities designed to prevent exacerbation:

- Compliance with Part 201 (Sec. 20121c) soil relocation provisions, as appropriate and as outlined in this Plan.
- Groundwater and/or stormwater management activities, as outlined in this Plan.
- Management of any existing contamination that was not previously known, as outlined in this Plan.
- Response activities to address a release resulting from construction activities, as outlined in this Plan.

5.2 Mitigate Unacceptable Exposures [Sec. 7(a)(2)]
Regarding any construction work done during the term of the land contract, between the Developer and the Operator, the Operator will undertake efforts to mitigate unacceptable exposures of hazardous substances to construction workers, utility workers, and others that could possibly occur in the future by undertaking the following activities as outlined in this Plan:

- Notifying contractors of existing contamination and requirements for a property-specific Health and Safety Plan if construction activities will be performed in the impacted area, or if previously unknown contamination or abandoned containers are found.
- The contractor will store any stockpiled soil on plastic sheeting and cover any stockpiled soil overnight or during any rain event.
- Complete and file a restrictive covenant for the property restricting the use of groundwater.

5.3 Reasonable Precautions [Sec. 7(a)(3)]
Given the nature of the identified contamination at the property and the property use, it is considered unlikely that a third party could come into contact with the groundwater contamination. However, both the Operator and the Developer will take reasonable precautions against the actions of third parties through the following activities:
• Notifying contractors of existing contamination and requirements for a property specific Health and Safety Plan if construction activities will be performed in the impacted area, or if previously unknown contamination or abandoned containers are found.

Should future construction or utility work be necessary in the area of impact, both the Operator and the Developer, as circumstances warrant, will provide a written notice of the general nature and extent of contamination on the property and potential unacceptable exposures to all of the following in accordance with R 299.51013(6):

• Easement holders of record,
• Utility franchise holders of record, and
• The owners or operators of all public utilities that serve the property.

5.4 Access [Sec. 7 a(4)]

Both the Operator and the Developer will provide reasonable cooperation, assistance, and access to the persons that are authorized to conduct response activities at the facility, including the cooperation and access necessary for the installation, integrity, operation, and maintenance of any complete or partial response activity at the facility.

5.5 Compliance with Land and Resource Use Restrictions [Sec. 7 a(5)]

Both the Operator and the Developer will comply with any land use or resource use restrictions established or relied on in connection with the response activities at the facility.

5.6 Integrity of Land and Resource Use Restriction [Sec. 7 a(6)]

The Developer will not impede the effectiveness or integrity of any land use or resource use restriction employed at the facility in connection with response activities.
ATTACHMENT I
Project No.: 74-090095-10
Project Name: Former Berger Supply, Grand Rapids, MI
Project Address: 725 Lake Michigan Drive, Grand Rapids, MI
Title: Property Location Map
Source: USGS 1996 Topographic Map

Property
## LOG OF GEOPROBES

<table>
<thead>
<tr>
<th>PROBE NO.</th>
<th>GROUND SURFACE ELEV.</th>
<th>DEPTH (FT)</th>
<th>SOIL DESCRIPTION</th>
<th>DISCRETE SAMPLE INFO.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>SAMPLE NO.</td>
</tr>
<tr>
<td>B-1</td>
<td>0-1.0</td>
<td>TOP SOIL – BROWN SAND WITH SOME ORGANICS</td>
<td>S-1</td>
<td>0</td>
</tr>
<tr>
<td></td>
<td>1.0-3.5</td>
<td>BROWN SAND</td>
<td>S-2</td>
<td>2.5</td>
</tr>
<tr>
<td></td>
<td>3.5-7</td>
<td>BROWN TO GRAY SAND (BLACK STAINING FROM 6 TO 7 FEET)</td>
<td>S-3* (6-7)</td>
<td>5</td>
</tr>
<tr>
<td></td>
<td>7-7.5</td>
<td>FILL: CONCRETE, DEBRIS AND GRAVEL</td>
<td>S-4</td>
<td>7.5</td>
</tr>
<tr>
<td></td>
<td>7.5-16</td>
<td>DARK BROWN SILTY SAND WITH TRACE ORGANICS</td>
<td>S-5</td>
<td>10</td>
</tr>
<tr>
<td></td>
<td></td>
<td>WATER NOT ENCOUNTERED</td>
<td>S-6</td>
<td>12.5</td>
</tr>
<tr>
<td></td>
<td></td>
<td>END OF BORING</td>
<td>S-7</td>
<td>15</td>
</tr>
<tr>
<td>B-2</td>
<td>0-0.25</td>
<td>ASPHALT</td>
<td>S-1</td>
<td>0</td>
</tr>
<tr>
<td></td>
<td>0.25-7</td>
<td>BROWN SAND AND GRAVEL WITH STONES AND WOOD DEBRIS (STAINING AT 6 FEET)</td>
<td>S-2</td>
<td>0.25</td>
</tr>
<tr>
<td></td>
<td>7-12</td>
<td>GRAY SILTY CLAY WITH TRACE GRAVEL</td>
<td>S-3</td>
<td>2.5</td>
</tr>
<tr>
<td></td>
<td></td>
<td>WATER ENCOUNTERED AT 7 FEET BGS</td>
<td>S-4* (6-7)</td>
<td>5</td>
</tr>
<tr>
<td></td>
<td></td>
<td>SCREEN SET FROM 7 TO 12 FEET BGS</td>
<td>S-5</td>
<td>7.5</td>
</tr>
<tr>
<td></td>
<td></td>
<td>END OF BORING</td>
<td>S-6</td>
<td>10</td>
</tr>
<tr>
<td>B-3</td>
<td>0-0.25</td>
<td>ASPHALT</td>
<td>S-1</td>
<td>0</td>
</tr>
<tr>
<td></td>
<td>0.25-2</td>
<td>BROWN SAND WITH SOME GRAVEL</td>
<td>S-2</td>
<td>0.25</td>
</tr>
<tr>
<td></td>
<td>2-6</td>
<td>BROWN SILTY CLAY WITH SOME GRAVEL (STONE AND DEBRIS PRESENT AT 3 FEET)</td>
<td>S-3* (2-3)</td>
<td>2.5</td>
</tr>
<tr>
<td></td>
<td>6-8</td>
<td>GRAY SILTY CLAY WITH TRACE GRAVEL</td>
<td>S-4</td>
<td>5</td>
</tr>
<tr>
<td></td>
<td></td>
<td>WATER NOT ENCOUNTERED</td>
<td>S-5</td>
<td>7.5</td>
</tr>
<tr>
<td></td>
<td></td>
<td>END OF BORING</td>
<td>S-6</td>
<td>12</td>
</tr>
<tr>
<td>B-4</td>
<td>0-0.25</td>
<td>ASPHALT</td>
<td>S-1</td>
<td>0</td>
</tr>
<tr>
<td></td>
<td>0.25-2.5</td>
<td>BROWN SAND WITH SOME GRAVEL AND TRACE DEBRIS</td>
<td>S-2</td>
<td>0.25</td>
</tr>
<tr>
<td></td>
<td>2.5-3.5</td>
<td>BROWN SILTY CLAY</td>
<td>S-3* (2-3)</td>
<td>2.5</td>
</tr>
<tr>
<td></td>
<td>3.5-6.5</td>
<td>BROWN SAND TRACE GRAVEL</td>
<td>S-4</td>
<td>5</td>
</tr>
<tr>
<td></td>
<td>6.5-8</td>
<td>BROWN SILTY SAND WITH SOME ORGANICS</td>
<td>S-6</td>
<td>15</td>
</tr>
</tbody>
</table>

### NOTES:

1. GEOPROBES BACKFILLED WITH HYDRATED BENTONITE CHIPS AFTER OBTAINING SOIL AND/OR WATER SAMPLES.
2. GEOPROBE DRILLING INSPECTED BY AARON LAMMERS OF NTH CONSULTANTS, LTD.
3. SOIL CLASSIFICATION BASED SOLELY ON VISUAL OBSERVATION.
4. * - SAMPLE SUBMITTED FOR ANALYTICAL TESTING.

**DRILLED BY:** West Michigan Drilling  **DATE:** 12-20-2010  **FIGURE NO:** 3
Survey for: Bill Stenower
13285 48th Avenue
Coopersville, MI 49404

Re: 725 Lake Michigan Drive NW

Description: Lot 25, also the South 34 feet of Lot 27, West Broadway Street Scriber's Addition, also Lots 26 and 28 except the North 44 feet of Lot 28 and except beginning at the Southeast corner of said Lot 26; thence West 60 feet; thence North 88 feet; thence East 78 feet; thence 28; thence South 88 feet to beginning, Gold Street Scriber's Addition, City of Grand Rapids, Kent County, Michigan, according to the recorded plat thereof.

Maurice J. Rosema P.S. no. 27459

STATE OF MICHIGAN
LICENSED PROFESSIONAL SURVEYOR

MAURICE J.
ROSEMA
LAND SURVEYOR
NO.
27459

TRU-LINE SURVEYING P.C.
1388A Belden Street, P.O. Box 725, Jenison, Michigan 49429
Telephone (616) 457-1711, FAX (616) 457-3742

File No.: 10195 Date: 6/24/2010
ATTACHMENT II
### TABLE No. 1a - Residential Soil Samples Collected on December 20, 2010

<table>
<thead>
<tr>
<th>Sample ID</th>
<th>1</th>
<th>2</th>
<th>3</th>
<th>4</th>
<th>3-DUP</th>
</tr>
</thead>
<tbody>
<tr>
<td>Collection Date</td>
<td>12/20/10</td>
<td>12/20/10</td>
<td>12/20/10</td>
<td>12/20/10</td>
<td>12/20/10</td>
</tr>
<tr>
<td>Soil Depth (Feet Below Grade)</td>
<td>7</td>
<td>4</td>
<td>3</td>
<td>3</td>
<td>3</td>
</tr>
<tr>
<td>Groundwater Protection Criteria</td>
<td>6-7</td>
<td>6-7</td>
<td>2-3</td>
<td>2-3</td>
<td>2-3</td>
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</tbody>
</table>

#### VOC ANALYTICAL METHOD

<table>
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<tr>
<th>SAMPLE ID</th>
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<th>3</th>
<th>4</th>
<th>3-DUP</th>
</tr>
</thead>
<tbody>
<tr>
<td>TEC (ug/kg)</td>
<td>U</td>
<td>U</td>
<td>619</td>
<td>700</td>
<td>580</td>
</tr>
<tr>
<td>Direct Contact</td>
<td>Csat/Background Collection Date</td>
<td>12/20/10</td>
<td>12/20/10</td>
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<tr>
<td>Limits</td>
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<tr>
<td>Direct Contact Criteria</td>
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<td>2,200,000</td>
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<tr>
<td>Screening Levels</td>
<td>GCP Criteria</td>
<td>Infinite Source Volatile Soil Inhalation Criteria (VSIC-Infinite)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Direct Contact</td>
<td>3,500,000,000</td>
<td>5,000,000,000</td>
<td>5,000,000,000</td>
<td>5,000,000,000</td>
<td>5,000,000,000</td>
</tr>
<tr>
<td>Direct Contact</td>
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<td>2,000,000,000</td>
<td>2,000,000,000</td>
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</tr>
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</table>

#### PNA ANALYTICAL METHOD

<table>
<thead>
<tr>
<th>SAMPLE ID</th>
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<th>2</th>
<th>3</th>
<th>4</th>
<th>3-DUP</th>
</tr>
</thead>
<tbody>
<tr>
<td>Concentration</td>
<td>3550B/8270C</td>
<td>3550B/8270C</td>
<td>3550B/8270C</td>
<td>3550B/8270C</td>
<td>3550B/8270C</td>
</tr>
<tr>
<td>Direct Contact Criteria</td>
<td>2600,000</td>
<td>2600,000</td>
<td>2600,000</td>
<td>2600,000</td>
<td>2600,000</td>
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<tr>
<td>Direct Contact Criteria</td>
<td>175,000,000</td>
<td>175,000,000</td>
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<tr>
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<td>7,000,000,000</td>
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<td>7,000,000,000</td>
<td>7,000,000,000</td>
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</tr>
<tr>
<td>Direct Contact Criteria</td>
<td>370,000,000</td>
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</tbody>
</table>

#### METALS ANALYTICAL METHOD

<table>
<thead>
<tr>
<th>SAMPLE ID</th>
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<th>3</th>
<th>4</th>
<th>3-DUP</th>
</tr>
</thead>
<tbody>
<tr>
<td>Concentration</td>
<td>1300</td>
<td>930</td>
<td>930</td>
<td>930</td>
<td>930</td>
</tr>
<tr>
<td>Direct Contact Criteria</td>
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</tr>
<tr>
<td>Direct Contact Criteria</td>
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<td>7,000,000,000</td>
</tr>
</tbody>
</table>

Notes:

- Only parameters with at least one detection, or a laboratory reporting limit exceeding one or more criteria have been included on this table. Refer to the laboratory data report for a full list of compounds/elements analyzed.
- CONC = Concentration
- U = Parameter not detected above the laboratory reporting limit. Refer to the laboratory data report for additional details, including MDL's achieved by the laboratory.
- A blank cell indicates that the parameter was not tested for that sample.
- *Criteria are draft and/or estimated by the MDEQ using surrogate toxicity information.

---

Table Checked By: GRJ PAGE 1 OF 1
TABLE No. 1b - Non-Residential

725 Lake Michigan Drive
Grand Rapids, Michigan

<table>
<thead>
<tr>
<th>Sample ID</th>
<th>B-1</th>
<th>B-2</th>
<th>B-3</th>
<th>B-4</th>
<th>B-3DUP</th>
</tr>
</thead>
<tbody>
<tr>
<td>VOCs (ug/kg)</td>
<td>CONC.</td>
<td>CONC.</td>
<td>CONC.</td>
<td>CONC.</td>
<td>CONC.</td>
</tr>
<tr>
<td>Benzene</td>
<td>U</td>
<td>U</td>
<td>570</td>
<td>500</td>
<td>500</td>
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<tr>
<td>Toluene</td>
<td>U</td>
<td>U</td>
<td>11,000</td>
<td>9,400</td>
<td>9,400</td>
</tr>
<tr>
<td>Xylenes</td>
<td>U</td>
<td>U</td>
<td>11,000</td>
<td>11,000</td>
<td>11,000</td>
</tr>
<tr>
<td>Acetophenone</td>
<td>U</td>
<td>U</td>
<td>3,700</td>
<td>2,900</td>
<td>2,900</td>
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<tr>
<td>Anisole</td>
<td>U</td>
<td>U</td>
<td>3,500</td>
<td>3,500</td>
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</tr>
<tr>
<td>Xylenes</td>
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<td>U</td>
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<tr>
<td>Acetone</td>
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<tr>
<td>Solvent</td>
<td>U</td>
<td>U</td>
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<tr>
<td>Toluene</td>
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<td>U</td>
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<tr>
<td>Propane</td>
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<td>U</td>
<td>1,350</td>
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<tr>
<td>Total</td>
<td>U</td>
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</tbody>
</table>

Notes:
- Only parameters with at least one detection, or a laboratory reporting limit exceeding one or more criteria have been included on this table. Refer to the laboratory data report for a full list of compounds/elements analyzed.
- VOCs = Volatile organic compounds
- U = Parameter not detected above the laboratory reporting limit. Refer to the laboratory data report for additional details, including MDL's achieved by the laboratory.
- A blank cell indicates that the parameter was not tested for that sample.
- All results reported on dry weight basis.

**Criteria Footnotes**
- NA = Criteria Not Applicable or Not Available
- N.L. = Not Likely to Leach
- U = Parameter not detected above the laboratory reporting limit.
- CONC. = Concentration
- Criteria: NA = Criteria Not Applicable or Not Available
- N.L. = Not Likely to Leach
- U = Parameter not detected above the laboratory reporting limit.
- CONC. = Concentration
- (C) = The calculated risk-based criterion is greater than the generic soil saturation (Csat) screening level
- (D) = Calculated criteria exceeds 100 percent, hence it is reduced to 100 percent or 1.0E+9 parts per billion (ppb)
- B = Soils not tested for this compound
- A blank cell indicates that the parameter was not tested for that sample.
- All results reported on dry weight basis.
- *Criteria are draft and/or estimated by the MDEQ using surrogate toxicity information.

Table Checked By: GRJ
PAGE 1 OF 1
### TABLE No. 2
Summary of Analytical Data
Groundwater Samples Collected on December 20, 2010
725 Lake Michigan Drive, Grand Rapids, Michigan

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>VOCs (ug/L)</td>
<td>CONC.</td>
<td>CONC.</td>
<td>CONC.</td>
<td>CONC.</td>
<td>CONC.</td>
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<tr>
<td>PMA ANALYTICAL METHOD</td>
<td>8230</td>
<td>8230</td>
<td>TDLx</td>
<td>DWC</td>
<td>GWIC</td>
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<tr>
<td>PNA ANALYTICAL METHOD</td>
<td>8270</td>
<td>8270</td>
<td>Various</td>
<td>Various</td>
<td>Various</td>
</tr>
<tr>
<td>METALS (ug/L)</td>
<td>CONC.</td>
<td>CONC.</td>
<td>CONC.</td>
<td>CONC.</td>
<td>CONC.</td>
</tr>
<tr>
<td>Arsenic</td>
<td>U</td>
<td>U</td>
<td>10 (L)</td>
<td>TDL</td>
<td>10</td>
</tr>
<tr>
<td>Barium</td>
<td>410</td>
<td>220</td>
<td>100</td>
<td>TDL</td>
<td>2,000</td>
</tr>
<tr>
<td>Cadmium</td>
<td>U</td>
<td>U</td>
<td>1</td>
<td>2.0 (A)</td>
<td>TDL</td>
</tr>
<tr>
<td>Chromium, Total</td>
<td>17</td>
<td>11</td>
<td>10</td>
<td>TDL</td>
<td>130 (G,X)</td>
</tr>
<tr>
<td>Copper</td>
<td>U</td>
<td>U</td>
<td>4</td>
<td>1,000 (E)</td>
<td>TDL</td>
</tr>
<tr>
<td>Lead</td>
<td>98</td>
<td>98</td>
<td>3</td>
<td>4 (L)</td>
<td>TDL</td>
</tr>
<tr>
<td>Mercury, Total</td>
<td>U</td>
<td>U</td>
<td>0.200</td>
<td>TDL</td>
<td>2.0 (A)</td>
</tr>
<tr>
<td>Selenium</td>
<td>U</td>
<td>U</td>
<td>5</td>
<td>50 (A)</td>
<td>TDL</td>
</tr>
<tr>
<td>Silver</td>
<td>U</td>
<td>U</td>
<td>0.2</td>
<td>TDL</td>
<td>0.2</td>
</tr>
<tr>
<td>Zinc</td>
<td>170</td>
<td>110</td>
<td>50</td>
<td>2,400</td>
<td>TDL</td>
</tr>
</tbody>
</table>

**Notes:**
- **CONC.** = Concentration
- **U** = Parameter not detected above the laboratory reporting limit. Refer to the laboratory data report for additional details, including MDL’s achieved by the laboratory.
- **NA** = Not Analyzed
- **(G)** = Criteria is pH and/or water hardness dependent. A hardness value of 100 mg CaCO₃/L has been used. Refer to Footnote G in MDEQ Op. Memo. No. 1, Attachment 1, dated June 27, 2005.
- **(L)** = Criteria for lead are derived using a biologically based model, as allowed for under Section 20120a(10) of the NREPA, and are not calculated using the algorithms and assumptions specified in pathway-specific rules.
- **(X) =** GSI criteria is not protective of surface water used as a source of drinking water. Refer to Footnote X in MDEQ Operational Memorandum No. 1, Attachment 1, dated June 27, 2005.

Checked By: GRJ