ANALYSIS OF BROWNFIELDS CLEANUP ALTERNATIVES (ABCA)

200 BLUE STAR HIGHWAY REDEVELOPMENT LOCATED AT 200 BLUE STAR HIGHWAY DOUGLAS, ALLEGAN COUNTY, MICHIGAN 49406

FY22 EPA BROWNFIELD CLEANUP GRANT BF 00E03211

April 9, 2024

Prepared for

The City of the Village of Douglas
86 West Center Street
Douglas, Michigan 49406

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1.0 INTRODUCTION AND BACKGROUND

This Analysis of Brownfields Cleanup Alternatives (ABCA) Report is an evaluation to document brownfield cleanup planning related to prospective site redevelopment of the 200 Blue Star Redevelopment project located at 200 Blue Star Highway, Douglas, Michigan, referred to herein as "subject property" or the "site", see Figure 1. This ABCA has been prepared for the City of the Village of Douglas ("the City") pursuant to the requirement specified in the City's cooperative Agreement with the U.S. Environmental Protection Agency (EPA) (BF-00E03211).

The City was awarded an EPA Brownfield Cleanup Grant in 2022 to assist with polychlorinated biphenyls (PCBs) cleanup activities on the subject property that will allow the City to position the property for redevelopment. Cleanup activities will contribute to reducing threats posed by the PCB contaminated soil present onsite. Although the site is also impacted by contamination from volatile organic compounds (VOCs), the scope of this EPA Brownfield Cleanup Grant will only address PCB contamination on the site. Cleanup and mitigation of the impacts from the VOC contamination will be addressed using additional brownfield redevelopment incentives at the state and local levels.

1.1: Subject property Location and Description

The subject property consists of one parcel totaling 7.18 acres located the west side of Blue Star Highway and the east side of Ferry Street (Chase Road), north of the Blue Star Highway and Ferry Street intersection in the City of Douglas, Michigan (Figure 1). The subject property consists of a vacant lot that includes a 146,761-square foot concrete slab/foundation associated with the former nonresidential building in the central portion, with grass along the property perimeters and in the rights-of-way, and asphalt and concrete pavement throughout the remainder of the property. The concrete slab/foundation is surrounded by a 6-foot tall chain link security fence to prevent access to the area by unauthorized persons, and is equipped with signage bearing the Large polychlorinated biphenyls (PSB) Mark (M_L) in accordance with 40 CFR 761.40, indicating that the area contains PCBs. The subject property is currently vacant with no current operations.

Subject Property Location/Address	200 Blue Star Highway, Douglas, Michigan
Number of Parcels and Acreage	One parcel containing 7.18 acres
Number of Building(s)	None
Current Property Use	Industrial
Current Zoning	C-2: General Commercial

The subject property location is depicted on Figure 1, Site Location Map. A diagram of the subject property and adjoining properties is included as Figure 2, Generalized Diagram of the Subject Property and Surrounding Area.

1.2: Subject property History and Previous Use(s)

The subject property is located at 200 Blue Star Highway and consists of a single parcel of approximately 7.18 acres. By 1938, it was initially developed as a fallow orchard with two small

structures. By the 1940s, the property was redeveloped to include two utility buildings and a 150,300 square foot, single-story industrial building with approximately 15 truck bays facing Blue Star Highway. From the 1940's through the mid-1970's the property's extensive history included plating, buffing, zinc die casting, metal forming, stamping, phosphatizing, and painting metal parts. Between the years of 1976 and 2014, the property was owned and occupied by Haworth Inc. (formerly Haworth Manufacturing) who used the facility to manufacture furniture. In 2019, the City acquired the subject property and demolished the buildings in 2022.

1.3: Previous Assessment Findings

The following is a list of previous environmental investigations performed on the property;

Name of Report	Date of Report	Prepared by
Phase I ESA	8/2015	Environmental Resources Management Michigan, Inc. (ERM)
Phase II ESA	10/9/2015	ERM
Remedial Alternatives Evaluation (RAE)	5/11/2018	GHD Services Inc. (GHD)
Polychlorinated Biphenyl (PCB) Cleanup Plan and Application for Risk-Based Cleanup and Disposal Approval (Cleanup Plan)	8/3/2018	GHD
Groundwater Sampling Results and Summary	3/13/2019	GHD
Phase I ESA	3/18/2019	PM Environmental (PM)
Baseline Environmental Assessment	5/2/2018	PM
Phase II ESA	10/2022	Tetra Tech, Inc.

<u>Phase II ESA – 10/9/15 (ERM)</u>
A Phase II Environmental Site Assessment (ESA) was completed for the subject property by ERM dated October 9, 2015. The Phase II ESA was conducted to assess the following Recognized Environmental Conditions (RECs) that were identified in a prior Phase I ESA completed by ERM in August 2015:

- Volatile Organic Compounds contamination documented beneath the subject building and subsequent Michigan Department of Environment Great Lakes and Energy (EGLE) sub-slab and indoor air sampling, which identified concentrations VOCs above the [then] current EGLE Nonresidential Recommended Interim Action Screening Levels (RIASLs) for vapor intrusion:

- Three 6,000-gallon underground storage tanks (USTs) located southwest of the building, two 500-gallon USTs located east and west of the building, three concrete waste treatment tanks beneath the concrete slab in the eastern portion of the building, and a 17,500-gallon fuel oil UST that was once located on leased land across Ferry Street, to the west of the subject property, which were all reported to have been removed, but no soil sampling documentation was available;

- The structural integrity of floor drains and trench drains in the subject property building;

- Former die casting operations conducted between the 1950s and 1971.

Subsurface investigation activities were conducted in the former die cast pit area (east room) of the subject property building, which is not currently used for warehousing. No other former operational areas of the subject property building, or exterior locations were included in the Phase II ESA other than a former vent pipe area located east of the subject property building's east exterior wall. Investigation activities included the advancement of 10 soil borings and the collection of soil samples for analysis of PCBs. Groundwater was not encountered in any of the soil borings advanced during ERM's August 2015 site investigation.

Soil analytical results identified concentrations of PCBs above 1.0 part per million (ppm) at three of the boring locations, however, the horizontal and vertical extent of PCB impacts were not defined within the Toxic Substances Control Act (TSCA) subpart D cleanup standards for unrestricted land use.

In addition, ERM collected six 24-hour indoor air samples at representative locations in the building for laboratory analysis of VOCs. No concentrations of VOCs were identified in any of the indoor air samples collected from the subject property building above laboratory method detection limits (MDLs).

ERM also traced a vent pipe along the eastern wall of the subject property building, which was suspected of being associated with a former fuel oil UST. No USTs were identified, and no sampling was completed. The other UST basins identified as RECs were not assessed.

Remedial Alternative Evaluation – 5/11/18 (GHD)

A Remedial Alternatives Evaluation (RAE) for the subject property was completed by GHD dated May 11, 2018. GHD reviewed previous reports that documented the nature and extent of trichloroethene (TCE) and PCB impacts at the subject property to evaluate remedial alternatives for the risks associated with the VOC groundwater plume and PCBs in soil for the vapor intrusion and direct contact pathways, respectively.

The RAE documented that ERM completed additional site investigations in December 2015, August, November, and December 2016, and January 2017 to attempt to delineate the horizontal and vertical extent of PCB impacts at the subject property. The soil analytical results identified concentrations of PCBs above 100.0 ppm at several locations ranging from 1 to 15.5 ft below ground surface (bgs). The horizontal extent of impacts was delineated within the TSCA subpart D cleanup standard for Low-Occupancy areas of 100 ppm.

ERM also collected concrete samples from the surface and lower layers of the concrete slab in the east room (warehouse). Concentrations of PCBs greater than 1.0 ppm were identified in all of the deeper intervals at concentrations ranging from 3.4 parts per million (ppm) to 5,600 ppm. The locations of the highest concentrations of PCBs were identified around the north and east pits, where concentrations exceeded 100 ppm. In addition, 10 surface concrete samples from the west room in the northwestern portion of the building were collected, none of which contained PCB concentrations exceeding 10 ppm, which is appropriate for high-occupancy use under the TSCA subpart D cleanup standards.

PCB Cleanup and Application for Risk-Based Cleanup and Disposal Approval – 8/3/18 (GHD)

In June 2018, GHD conducted an additional site investigation to vertically delineate the extent of PCB impacts greater than 1 ppm and 100 ppm, respectively, and/or confirm soil boring refusal depths encountered by ERM during previous site investigations in the central portion of the east room between 12.0 and 15.0 feet bgs to evaluate 27 identified data gaps. GHD concluded that the drilling work confirmed refusal at 21 of the 27 data gaps between 12.0 and 15.0 feet below

ground surface (bgs). At the remaining six soil boring locations, soil samples were collected at depths to 19.0 to 20.0 feet bgs, none of which identified concentrations of PCBs above laboratory method detection limits (MDLs). Based on these results, GHD assumed vertical delineation in the east room at approximately 18.0 to 20.0 feet bgs. Additional vertical delineation would be required to fully define the vertical extent of PCB impacts to within the TSCA subpart D cleanup standards below refusal depths.

The results of GHD's investigation are included in a PCB Cleanup Plan (Cleanup Plan), dated August 3, 2018. GHD's Cleanup Plan contains a Draft PCB Cleanup Plan that was completed by ERM in 2017. Included within the plan is documentation of additional sampling that was conducted by ERM to evaluate PCBs impacts to groundwater and soil gas. Sampling included the installation of four temporary monitoring wells to a depth of approximately 40 feet bgs downgradient to the north of the east room for collection of groundwater samples. No concentrations of PCBs were identified above laboratory MDLs. Three soil gas samples collected in the east room identified no concentrations of PCBs above laboratory MDLs.

Concrete floor sampling was also conducted in the east and west rooms. PCB concentrations in concrete above 100 ppm were not identified in the west room. In the north central portion of the east room, PCB concentrations exceeding 100 ppm were detected and fully delineated. Along the east and north walls, PCB concentrations were greater than 1 ppm but less than 5 ppm. All other delineation samples collected from the east room were below 1 ppm or below laboratory detection limits.

Based on these results, GHD presented the following recommended approach in the Cleanup Plan, which envisioned Low-Occupancy uses of the subject property, as defined under TSCA:

- PCBs ≤ 100 ppm – leave in place and cap with an epoxy seal;
- PCBs > 100 ppm from 0.0 to 5.0 feet bgs – excavate to 5.0 feet bgs and dispose of offsite;
- PCBs > 100 ppm greater than 5.0 feet bgs – leave in place and cap with an epoxy seal; and
- PCBs > 1 ppm – cap with an epoxy seal all areas that exceed 1 ppm.

Additional recommended activities included:

- Collection of confirmation soil samples in the planned PCB excavation area following TSCA verification of soil remediation guidance.
- No PCB removal activities of soil or concrete to be completed in the west room; and
- Recording deed restrictions for the subject property consistent TSCA requirements.

<u>Groundwater Sampling Results and Summary - 3/13/2019 (GHD)</u>
Groundwater monitoring results dated 2019 document similar concentrations as previously identified. Sampling results indicate that the chlorinated VOCs present in groundwater have not mobilized the PCBs present in the impacted soils to groundwater.

<u>Phase II ESA – 10/2022 (Tetra Tech, Inc.)</u>
A Phase II ESA was completed for the subject property by Tetra Tech, Inc. in October 2022 under EPA's Targeted Brownfields Assessment (TBA) program. The Phase II ESA was conducted to further delineate the extent of polychlorinated biphenyl (PCB) contamination in concrete and shallow soil in the areas where the former East and West Rooms were located (northern portion of the building slab area). Based on prior assessments, these areas have greater impact from

PCBs compared to the rest of the site. In addition, waste characterization samples were collected from the concrete and shallow soils to determine the appropriate disposal categories.

A total of 30 concrete core borings were advanced in the former East and West Room areas of the site to a maximum depth of 3 feet. Within the former East Room area, PCB Aroclor-1254 was detected in 19 samples above the TSCA regulated criteria of 1.0 mg/kg but below the criteria of 50.0 mg/kg, and in 7 samples where the concentrations were above the TSCA waste criteria of 50 mg/kg. No PCB concentrations were detected in the concrete sample collected within former West Room area.

Soil samples were analyzed for PCBs, TCLP VOCs, TCLP SVOCs, and TCLP metals. The soil samples were analyzed for PCBs to determine the required disposal method of the soil. In addition, some samples were analyzed for TCLP parameters to determine if they exceeded hazardous waste criteria in 40 CFR 261.24. Within the former East Room area, PCB Aroclor-1254 was detected in five (5) samples above the TSCA regulated criteria of 1.0 mg/kg but below the criteria of 50.0 mg/kg, and in one sample where the concentrations were above the TSCA waste criteria of 50 mg/kg. No PCB concentrations were detected in the concrete sample collected within former West Room area.

1.4: Project Goals

The City's intent is to better position the property for redevelopment by addressing the PCB contamination known to exist at the site. The City will retain ownership of the property and oversee the cleanup activities until the property can be sold to a developer and redeveloped.

The City intends to engage in PCB cleanup activities to achieve Risk-Based Low-Occupancy TSCA cleanup standards. The magnitude of these costs along with additional costs necessary to implement due care response activities exceeds the capabilities of available brownfield tax increment financing, as well as other state cleanup programs. Cleanup of PCB contamination to the Risk-Based Low-Occupancy TSCA standard will eliminate a significant cleanup cost, which would make state brownfield tax increment financing feasible to implement the necessary due care response activities available for redeveloping property.

In fall of 2023, the City retained a planning consultant to develop three conceptual site development plans for the site to determine the site's highest and best use with respect to the goals and objectives of the City's Master Plan as well as other planning and visioning documents that were developed for the Blue Star Highway corridor. Once these conceptual development plans were developed, the City held a public meeting and a survey to obtain public feedback and comment, which was used to select the preferred concept.

The preferred conceptual site development plan that was selected includes the redevelopment of the property into mixed-uses that include the following:

- a linear park and gathering area for passive recreational activities and outdoor movies,
- two mixed use, two-story buildings that feature ground floor commercial uses and residential units above,
- four two story live-work residential spaces that could be used for senior housing and/or affordable housing,
- reforested greenspace and vegetative buffers,

- a new public road with on street parking in the location where the former East and West Rooms were located, and
- courtyards and sidewalks.

The preferred conceptual site plan and renderings are included as Attachment A.

The project goals for this ABCA are to identify, evaluate, and select an appropriate cleanup plan to address the soil, groundwater, and soil gas impacts identified at the subject property. Based on the preliminary redevelopment concept, the goal of the ABCA also relate to activities likely required to achieve compliance with the Risk-Based Low-Occupancy TSCA cleanup standards with the implementation of cleanup activities, as it pertains to documented soil, groundwater, and soil gas impacts at the subject property.

2.0 APPLICABLE REGULATIONS AND CLEANUP STANDARDS

2.1: Law and Regulations Applicable to the Cleanup

Laws and regulations that are applicable to this cleanup include the Federal Toxic Substances Control Act (15 U.S.C. chapter 53, subchapter 1, sections 2601-2629) and Brownfields Revitalization Act (Pub. L. 107-118, 115 stat. 2356), the Federal Davis-Bacon Act (Ch. 411, 46 Stat. 1494) and Michigan Parts 111, 115, and 201. Federal, state, and local laws regarding procurement of contractors to conduct the cleanup will be followed. As described herein, all cleanup will be in accordance with the State of Michigan regulations and Federal TSCA regulations. All applicable permits and documentation (i.e. One-Call, Project Notification Forms, etc.) will be obtained prior to the work commencing, and all work will be conducted in accordance with the conditions for approval. Pertinent laws and regulations applicable to the contaminant of concern for this ABCA are detailed in the following subsections.

2.1.1: Cleanup Standards for Major Contaminants

Documented soil, groundwater, and soil gas impacts were identified at the subject property and compared to TSCA subpart D cleanup standards. These standards are described as follows:

Standard	No Action	Appropriate Cap w/Deed Restriction	Removal Required
High-Occupancy Area (≥335 hours/year)	≤1 ppm	>1 to ≤10 ppm	>10 ppm
Low-Occupancy Area (<335 hours/year)	≤25 ppm w/ deed restriction	>25 to ≤100 ppm	>100 ppm

ppm = parts per million

Cleanup activities will be undertaken in a manner compliant with TSCA subpart D cleanup standards, federal Occupational Safety and Health Administration (OSHA), and/or Michigan Occupational Safety and Health Administration (MIOSHA), as applicable.

The regulations also require work practice standards designed to eliminate or minimize the release of contaminated soil during the cleanup process. The objective of the contamination cleanup or mitigation is to reduce or eliminate the potential risk of exposure to site occupants and to workers and the public during remediation at the subject property. In order to be considered

effective, the remedial alternative selected for the subject property needs to minimize the potential for human exposure to contaminated soil.

2.2: Cleanup Oversight Responsibility

An environmental professional will oversee cleanup remediation activities which will include reporting to EPA upon completion.

3.0 POTENTIAL CLEANUP ALTERNATIVES

The sections below provide an outline of the conceptual alternatives to achieve TSCA subpart D compliance in relation to identified contamination on the subject property.

Multiple potential alternatives have been selected for further evaluation and comparison:

- Alternative #1: No Action
  - No action
- Alternative #2:
  - Comprehensive Cleanup to Achieve Compliance with Michigan's Part 201 Cleanup Criteria, and federal Self-Implementing High-Occupancy TSCA (no surface cap). Specifically, the Michigan Part 201 Residential Generic Cleanup Criteria and federal TSCA Self-Implementing High-Occupancy Standards will be utilized.
- Alternative #3:
  - Cleanup of Former East and West Room Areas to Achieve Compliance with TSCA Risk-Based Low-Occupancy Standards.

Each alternative was evaluated for applicability to the subject property and its feasibility and are further discussed in the following sections.

3.1: Alternative #1: "No Action"

The "no action" cleanup alternative is included in the evaluation as a standard to compare other remedial action in order to compare and contrast any significant reduction in subject property risk, as necessary. For the "no action" alternative, no action to remediate the issues identified at the subject property would take place and the contaminants would remain in place. This alternative does not include a means to mitigate or eliminate potential exposure both during and following redevelopment and does not meet the objectives of the project.

3.1.1: Effectiveness

This alternative is not effective in controlling the release of contaminants or achieving project goals. Contamination will remain in the ground and potentially cause issues related to the development activities including soil management.

3.1.2: Implementability

The 'No Action' alternative is simple to implement since no activities will be conducted.

3.1.3: Cost

No direct costs associated with this alternative; however, potential environmental and financial liabilities would not be addressed and may result in additional management costs during development.

3.2: Alternatives to "No Action"

The following Tables document Alternatives 2 and 3 for an easier comparison of Effectiveness, Implementability and Cost.

Alternatives to "No Action" CONCEPTUAL CLEANUP OPTIONS

Alternative 2: Comprehensive Cleanup to Achieve Compliance with Michigan's Part 201 Cleanup Criteria, and federal Self-Implementing High-Occupancy TSCA					
	Advantages/Disadvantages	**Conceptual Budgetary Costs**	**Effectiveness Feasibility**	**Anticipated Cleanup Standard**	**Timeframe**
Comprehensive Cleanup of PCB/VOCs, and Metals above Part 201 Residential and Nonresidential Cleanup Criteria and, Volatilization to Indoor Air Pathway (VIAP) Screening Levels, and TSCA High-Occupancy Criteria. Removal of Contaminated Materials	**Advantages** • Removal of all contamination from the site that represents a potential unacceptable exposure risk to occupants. • Facilitates unrestricted use of the property. • Potential exposure risks via the groundwater ingestion pathway controlled using a Restrictive Covenant **Disadvantages** • A groundwater contaminant plume originating from the site already extends greater than 1,600 feet offsite to the north/northwest such that cleanup of all contamination on the site will not address the offsite plume area. • Not cost feasible when compared to other alternatives. • Additional evaluation and delineation studies needed to completely delineate the vertical and horizontal extent of contamination relative to current EGLE VIAP Screening Levels or Volatilization to Indoor Air Criteria (VIAC) issued by EGLE • Additional feasibility and pilot testing required to implement cleanup. • The contaminant types onsite require different cleanup technologies such that a combination of extensive excavation coupled with remediation system operation, possible in-situ groundwater treatment, and long-term groundwater monitoring would be required • Cleanup activities would require years to achieve.	Greater than $1,000,000	Effectively removes occupant contaminant exposure conditions	Part 201: Drinking Water, Ground-Water Surface Water Interface, Direct Contact, and Volatilization to Indoor Air Inhalation Cleanup Criteria TSCA Subpart D Cleanup Standards (Risk-Based High-Occupancy)	Five to ten years (or greater)

Alternative 3: Cleanup of Contaminated Areas to Achieve Compliance with TSCA Risk-Based Low-Occupancy Standards.					
	Advantages/Disadvantages	**Conceptual Budgetary Costs**	**Effectiveness Feasibility**	**Anticipated Cleanup Standard**	**Timeframe**
Cleanup of PCBs to Achieve Risk-Based TSCA Low-Occupancy Subpart D Cleanup Standards Utilization of Traditional Brownfield TIF to address Due Care Compliance (i.e. vapor mitigation, institutional controls, etc.)	**Advantages** • Cost feasible • Risk Based Approach allows source removal while implementing targeted engineering and institutional controls to facilitate reuse and redevelopment consistent with a low-occupancy land use as defined under TSCA. • Allows EPA input to Risk-Based TSCA Cleanup Workplan/Approach that is submitted to EPA prior to implementation; • Allows leveraging of state brownfield TIF programs for non-PCB impacts; • Reduces waste generation compared to Alternative 2 or a more conservative Self-Implementing standard under TSCA. • Moderate property disruption relative to other options. • Timeframe for cleanup activities significantly reduced compared to Alternative 2. • Maximizes redevelopment/reuse potential relative to PCB impacts including those consistent with Low-Occupancy uses and mixed Residential/Commercial land uses; • Redevelopment features, like building pads, parking lots and driveways can be adopted or implemented to meet risk-based cleanup requirements and/or controls. **Disadvantages** • Only addresses TSCA subpart D cleanup standards. Additional institutional controls likely needed. • Surface barriers, vapor intrusion controls, or institutional controls may still be needed, which will require operation and maintenance. • Annual inspections and documentation may be required to demonstrate compliance with Due Care obligations and the institutional and engineering controls required for Risk-Based TSCA Closure;	±$500,000 to $600,000 PCBs are Removed to Meet Risk-Based Low-Occupancy Standards, and Engineering/ Institutional Controls Implemented	Effective, achieves compliance with Risk-Based TSCA subpart D Low-Occupancy cleanup standards.	TSCA Subpart D Cleanup Standards (Risk-Based Low-Occupancy)	6-12 months

4.0 RECOMMENDED CLEANUP ALTERNATIVE

Given the cost feasibility involving cleanup of the PCB contamination on the property, the recommended cleanup option is Alternative 3: Cleanup of PCB Contaminated Areas to Achieve Compliance with Risk-Based Low-Occupancy TSCA Subpart D Cleanup Standards.

While still a viable option for remediation, the costs associated with Alternative 2 is not economical as the total remediation costs are estimated to be greater than the property's value. In addition, a comprehensive cleanup of the property would not address the existing offsite groundwater contaminant plume which has migrated greater than 1,600-feet to the north/northwest. Cleanup of the PCB contaminations to TSCA Risk-Based Low-Occupancy Standards would effectively utilize EPA Brownfield Cleanup funding to address a portion of remedial activities needed, which would allow the leveraging of state brownfield TIF incentives to redevelop the site. Neither program would provide enough funding to fully address the cleanup of the PCB contamination and address due care response activities on their own.

Following the implementation of cleanup activities, The City will submit a Risk-Based TSCA Closure Report to EPA documenting compliance with TSCA subpart D. It is understood that the Closure Report will need to include requirements for post-closure actions including inspections and operation and maintenance activities, as applicable.

5.0 REFERENCES

The following previous site investigations, some of which are available from public sources.

Name of Report	Date of Report	Prepared by
Phase II ESA	10/9/2015	Environmental Resources Management Michigan, Inc. (ERM)
Remedial Alternatives Evaluation (RAE)	5/11/2018	GHD Services Inc. (GHD)
PCB Cleanup Plan and Application for Risk-Based Cleanup and Disposal Approval (Cleanup Plan)	8/3/2018	GHD
Groundwater Sampling Results and Summary	3/13/2019	GHD
Phase II ESA	10/2022	Tetra Tech, Inc.

In addition, the following published sources were utilized during completion of this ABCA:

- TSCA Part 761 "Polychlorinated Biphenyls Manufacturing, Processing, Distribution in Commerce, and Use Prohibitions", Subpart D "Storage and Disposal";
- "Part 201 Cleanup Criteria and Part 213 Risk-based Screening Levels," Revised December 2013 and in accordance with Section 20120a(1);
- EGLE Operational Memorandum No. 4 "Site Characterization and Remediation Verification – Attachment 10, Peer Review Draft Groundwater Not in an Aquifer," February 2007;
- EGLE Operational Memorandum No. 2 "Sampling and Analysis," October 22, 2004, Revised July 5, 2007;
- EGLE Guidance Document for the Vapor Intrusion Pathway, May 2013;

- Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process, ASTM, ASTM Designation E 1527-13, Published November 2013.

FIGURES

Figure 1

Site Vicinity Map

ALLEGAN COUNTY

FIGURE 1

PROPERTY VICINITY MAP

UNITED STATES GEOLOGICAL SERVEY, 7.5 MINUTE SERIES

SAUGATUCK, MI QUADRANGLE, 1951. PHOTO REVISED 1975.

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PROJ:
INDUSTRIAL PROPERTY
200 BLUE STAR HIGHWAY
DOUGLAS, MI

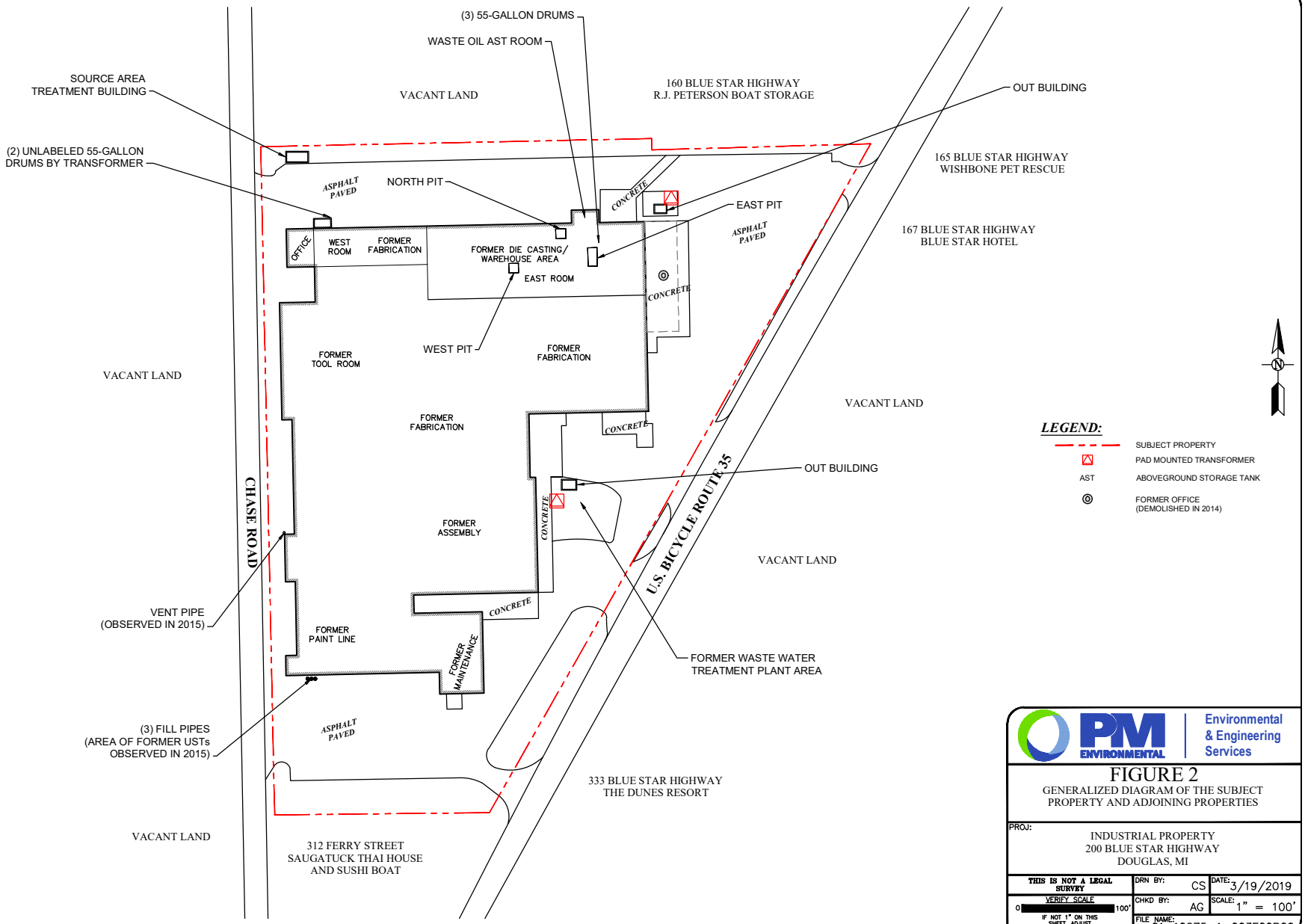
THIS IS NOT A LEGAL SURVEY

VERIFY SCALE
0 2,000'
IF NOT 1" ON THIS SHEET, ADJUST SCALES ACCORDINGLY.

DRN BY: CS
DATE: 3/19/2019
CHKD BY: AG
SCALE: 1" = 2,000'
FILE NAME: 01-10275-1-003F00R00

Figure 2

Generalized Diagram of the Subject Property and Adjoining Properties



PM ENVIRONMENTAL
Environmental & Engineering Services

FIGURE 2

GENERALIZED DIAGRAM OF THE SUBJECT PROPERTY AND ADJOINING PROPERTIES

PROJ:
INDUSTRIAL PROPERTY
200 BLUE STAR HIGHWAY
DOUGLAS, MI

THIS IS NOT A LEGAL SURVEY	DRN BY: CS	DATE: 3/19/2019
VERIFY SCALE 0 100' IF NOT 1" ON THIS SHEET, ADJUST SCALES ACCORDINGLY.	CHKD BY: AG	SCALE: 1" = 100'
	FILE NAME: 01-10275-1-003F00R00	

Figure 3

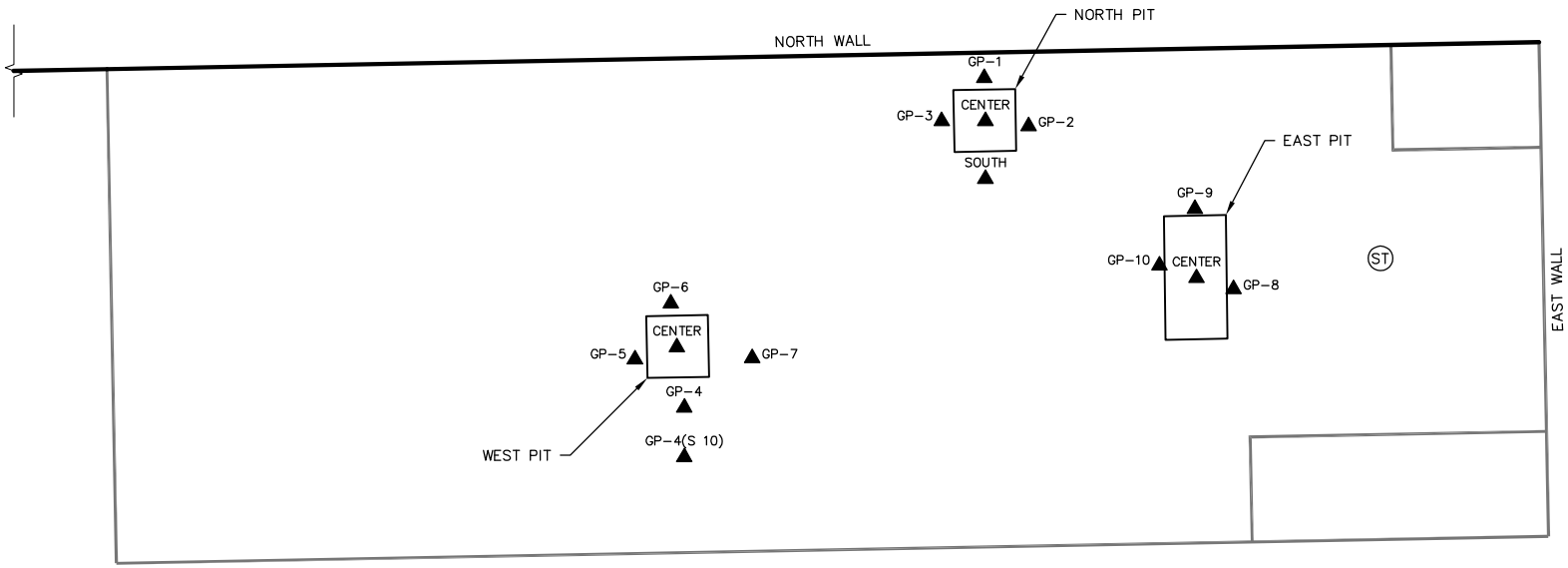
Boring Location Maps
Phase II ESA
(ERM, 2015)

SITE LAYOUT MAP

CADD Review RMK	ERM®	**HAWORTH DOUGLAS PLANT** 200 BLUE STAR HIGHWAY DOUGLAS, MICHIGAN	CHK'D BY: CO
DRAWN BY: GML			0317523
Date Drawn/Rev'd 07/24/15		Environmental Resources Management	FIGURE 1

R:\Cadd\ClntA-D\Buckman MacDonald\0317523\0317523-01.dwg, SITE LAYOUT MAP, 9/28/2015 9:54:58 AM, GML

SITE PITS AND BORING LOCATION MAP



LEGEND

ST STORM WATER CATCH BASIN

GP-7 ▲ GEOPROBE SOIL BORING LOCATION

N

0 20 40

SCALE (IN FEET)

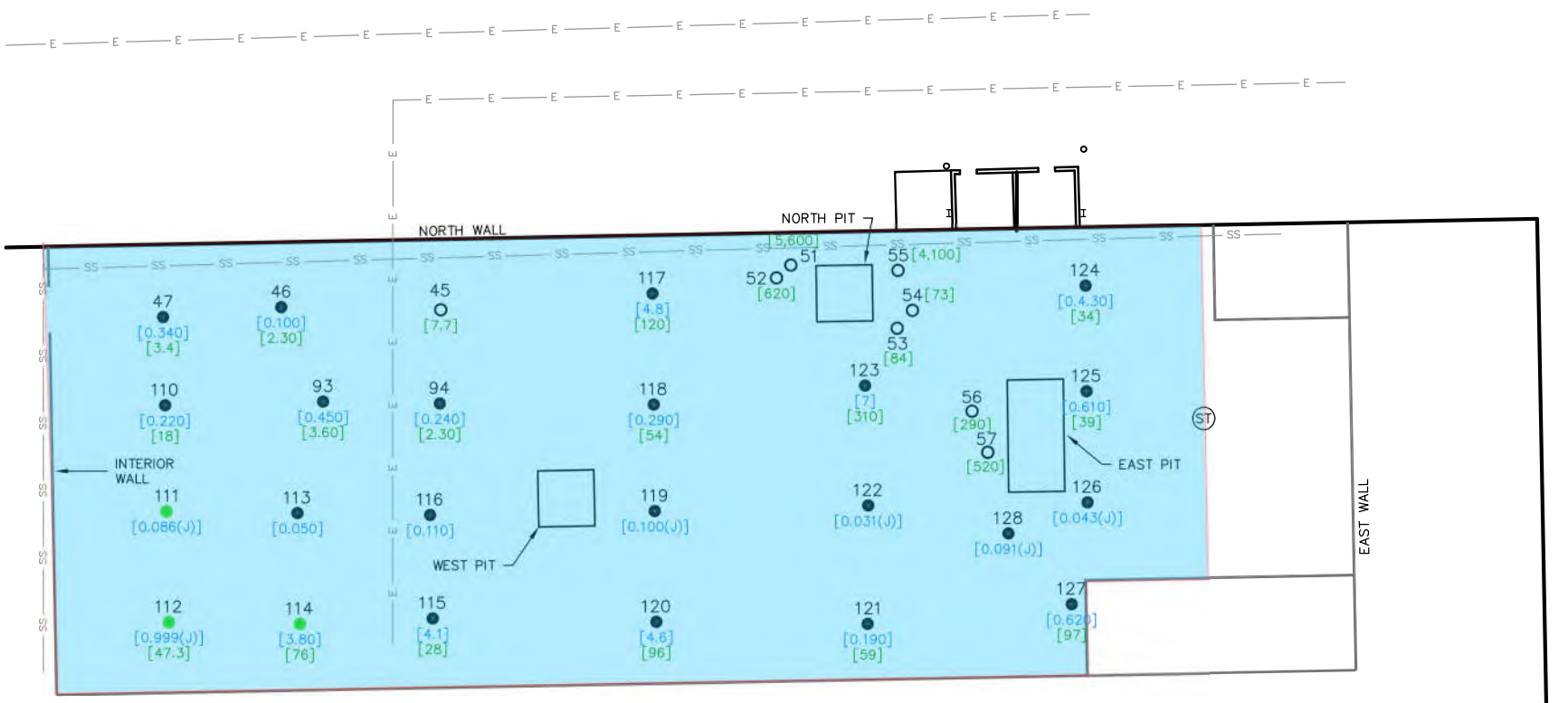
Drawn By GML	ERM®	HAWORTH DOUGLAS PLANT 200 BLUE STAR HIGHWAY DOUGLAS, MICHIGAN	CHK'D DRR
CADD Review RMK			0317523
Date Drawn/Rev'd 09/28/15		Environmental Resources Management	FIGURE 2

R:\Cadd\Clnt\A-D\Buckman MacDonald\0317523\0317523-01.dwg, SITE PIT-BORING LOCATION, 9/29/2015 9:01:55 AM, GML

Figure 4

Site Investigation Maps
Remedial Alternative Evaluation
(GHD, 8/2016 and 12/2016)

EAST ROOM – CONCRETE RESULTS



NOTE:
1. ALL SAMPLES WHERE COLLECTED FROM THE SURFACE OF THE CONCRETE.
2. PCB CONCENTRATIONS ARE REPORTED IN ppm

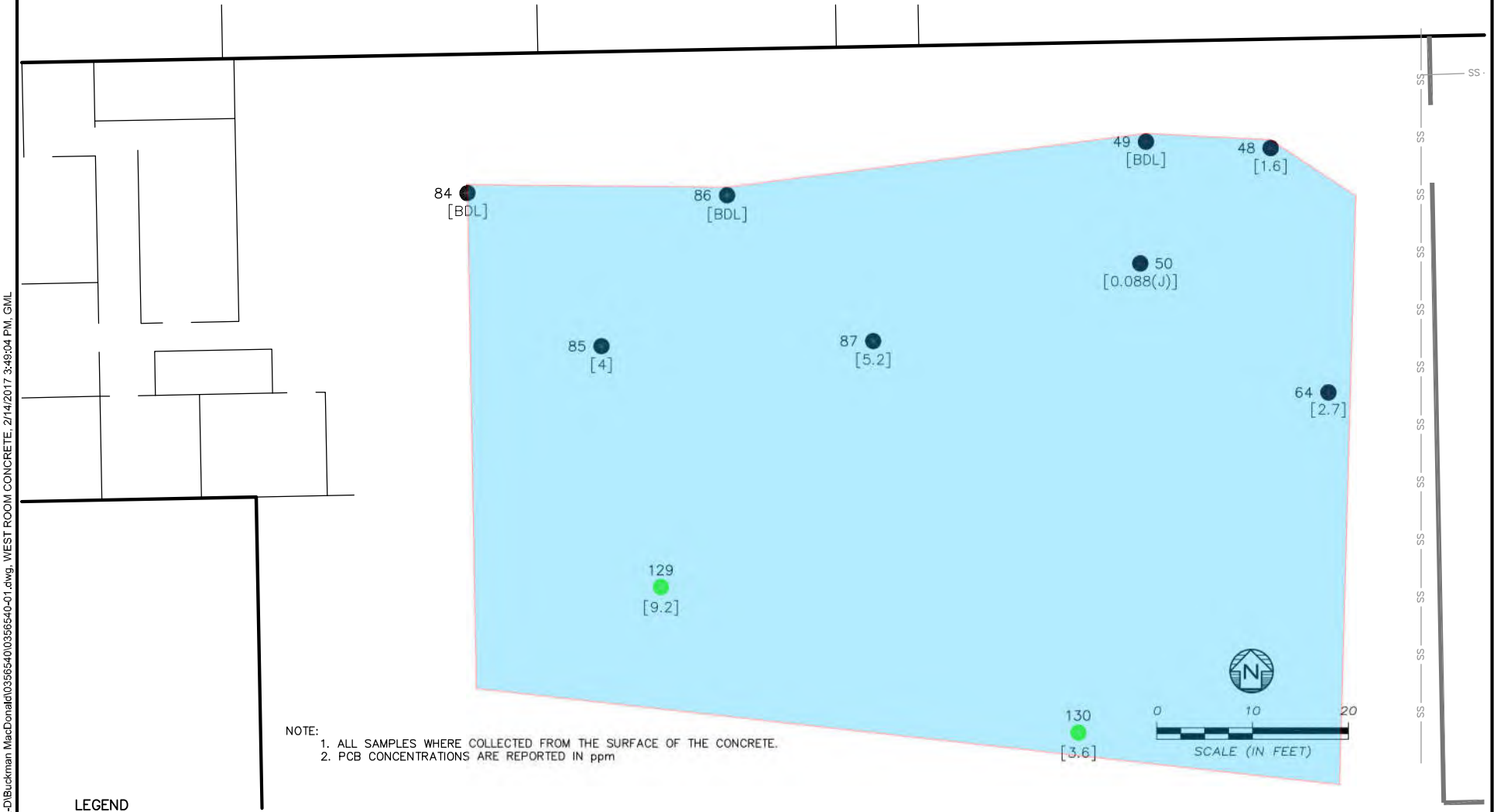
LEGEND

- (ST) STORM WATER CATCH BASIN
- AUGUST 2016 CONCRETE SAMPLE LOCATION
- DECEMBER 2016 CONCRETE SAMPLE LOCATION
- JAN. 2017 CONCRETE SAMPLE LOCATION
- [0.100] SURFACE CONCRETE RESULTS
- [2.30] LOWER CONCRETE LAYER RESULTS

Drawn By GML	ERM	FORMER CHASE MANUFACTURING PROPERTY 200 BLUE STAR HIGHWAY DOUGLAS, MICHIGAN	CHK'D DRR
CADD Review RMK			0356540
Date Drawn/Rev'd 9/28/15–12/22/16		Environmental Resources Management	FIGURE 2B

F:\Team\DMM\ClntA-D\Buckman MacDonald\0356540\0356540-01.dwg, EAST ROOM CONCRETE, 2/14/2017 3:54:22 PM, GML

WEST ROOM – CONCRETE RESULTS



NOTE:
1. ALL SAMPLES WHERE COLLECTED FROM THE SURFACE OF THE CONCRETE.
2. PCB CONCENTRATIONS ARE REPORTED IN ppm

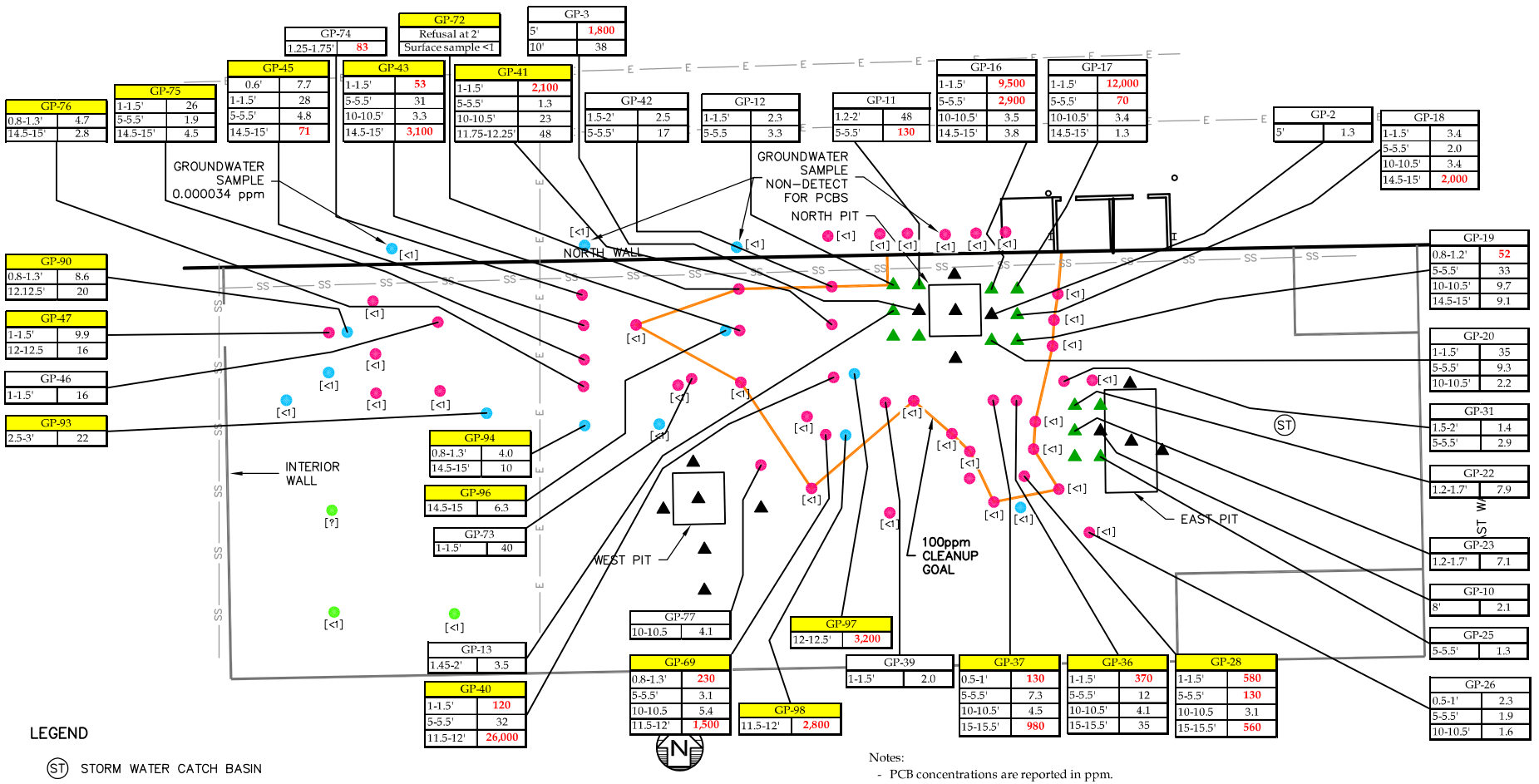
LEGEND

- NOV.–DEC. CONCRETE SAMPLE LOCATION
- JAN. 2017 CONCRETE SAMPLE LOCATION
- [4] RESULTS
- [BDL] BELOW DETECTABLE LIMITS

Drawn By GML	ERM	FORMER CHASE MANUFACTURING PROPERTY 200 BLUE STAR HIGHWAY DOUGLAS, MICHIGAN	CHK'D AD
CADD Review RMK			0356540
Date Drawn/Rev'd 9/28/15–12/22/16		Environmental Resources Management	FIGURE 3B

F:\Team\DMM\ClntA-D\Buckman MacDonald\0356540\0356540-01.dwg, WEST ROOM CONCRETE, 2/14/2017 3:49:04 PM, GML

EAST ROOM – SOIL RESULTS



LEGEND

- (ST) STORM WATER CATCH BASIN
- ▲ SEPTEMBER 2015 GEOPROBE SOIL BORING LOCATION
- ▲ DECEMBER 2015 GEOPROBE SOIL BORING LOCATION
- ● AUGUST 2016 GEOPROBE SOIL BORING LOCATION
- ● NOV.–DEC. 2016 GEOPROBE SOIL BORING LOCATION
- ● JANUARY 2017 GEOPROBE SOIL BORING LOCATION
- [<1] RESULTS ARE LESS THAN 1 mg/kg FOR ALL SAMPLES COLLECTED AT THIS LOCATION

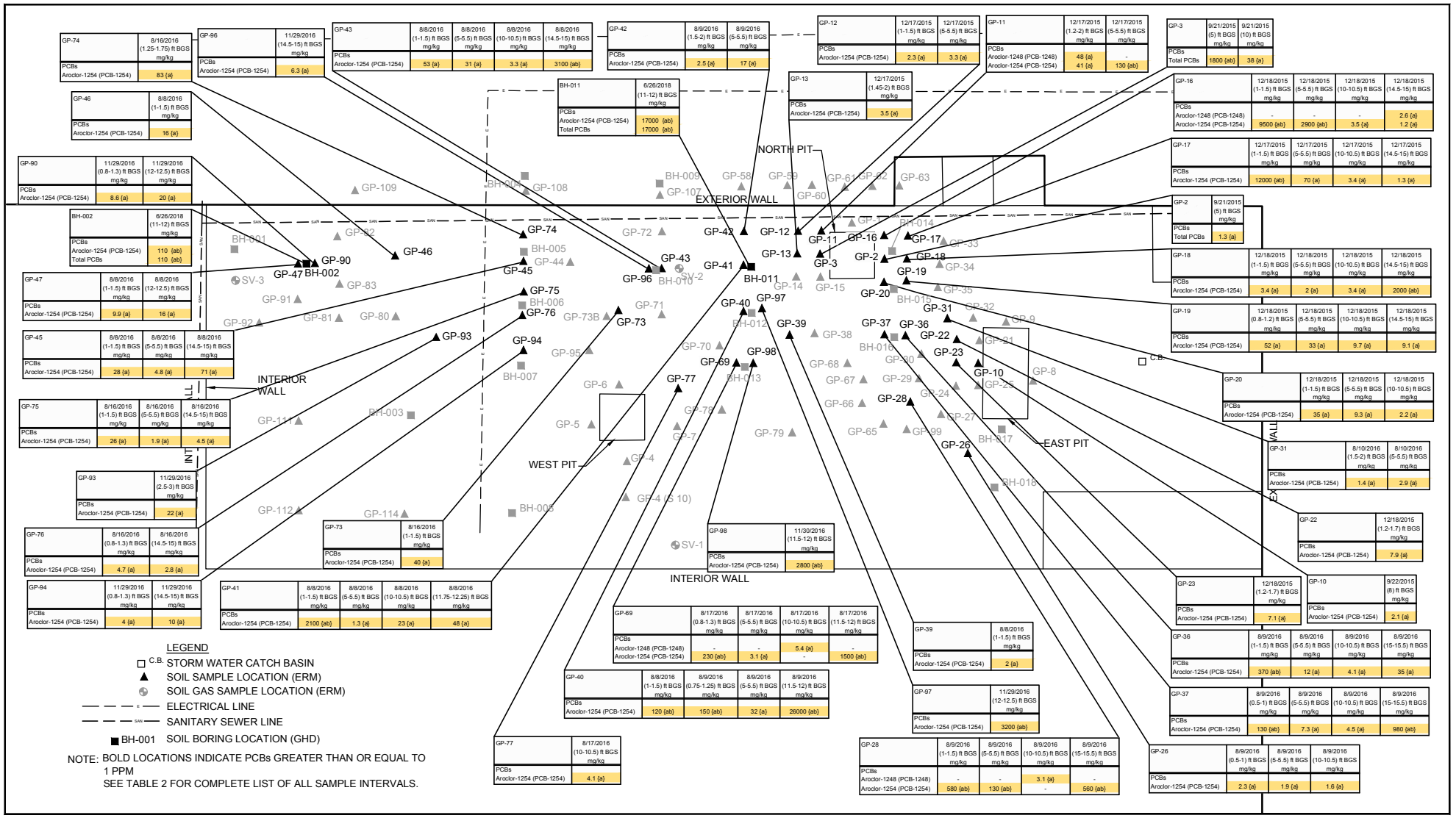
Notes:
- PCB concentrations are reported in ppm.
- Samples analyzed using EPA Method 8082 and concentrations shown are the sum of Aroclor 1248 and Aroclor 1254.
- Red colored values exceed the referenced >50 ppm TSCA standard.
- Yellow highlights represent boring locations where refusal was encountered and the drill rig was unable to advance.

Drawn By GML	FORMER CHASE MANUFACTURING PROPERTY	CHK'D DRR	
CADD Review RMK	200 BLUE STAR HIGHWAY DOUGLAS, MICHIGAN	0356540	
Date Drawn/Rev'd 9/28/15–12/22/16	Environmental Resources Management	FIGURE 2A	

F:\Team\DM\V\ClntA-D\Buckman MacDonald\0356540\0356540-01.dwg, EAST ROOM SOIL, 2/14/2017 3:59:00 PM, GML

Figure 5

Site Investigation Maps
PCB Cleanup and Application Risk-Based Disposal
(GHD, 12/2015 - 6/2018)



Source: Microsoft Product Screen Shot(s) Reprinted with permission from Microsoft Corporation, Acquisition Date [unknown], Accessed: 2018

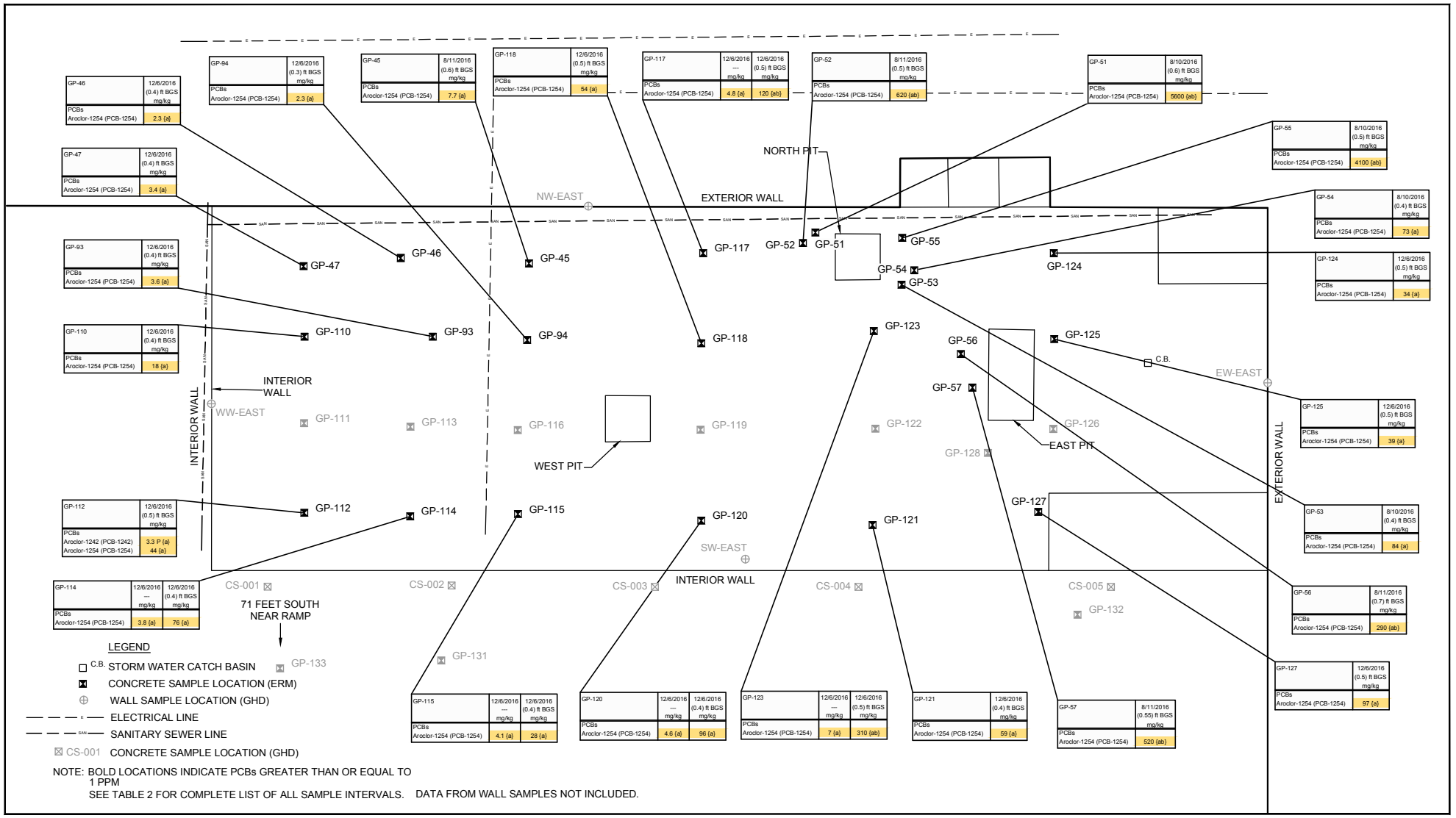
HAWORTH
200 BLUE STAR HIGHWAY
DOUGLAS, MICHIGAN

11152042-02
Jul 31, 2018

EAST ROOM PCB SOIL SAMPLE LOCATIONS AND RESULTS

FIGURE 3

CAD File: I:\drawings\11150000s\11152042\11152042-REPORTS\11152042-02(001)GN-DE003.dwg



Source: Microsoft Product Screen Shot(s) Reprinted with permission from Microsoft Corporation, Acquisition Date [unknown], Accessed: 2018

0 10 20ft

Coordinate System: STATE PLANE MI-NAD83

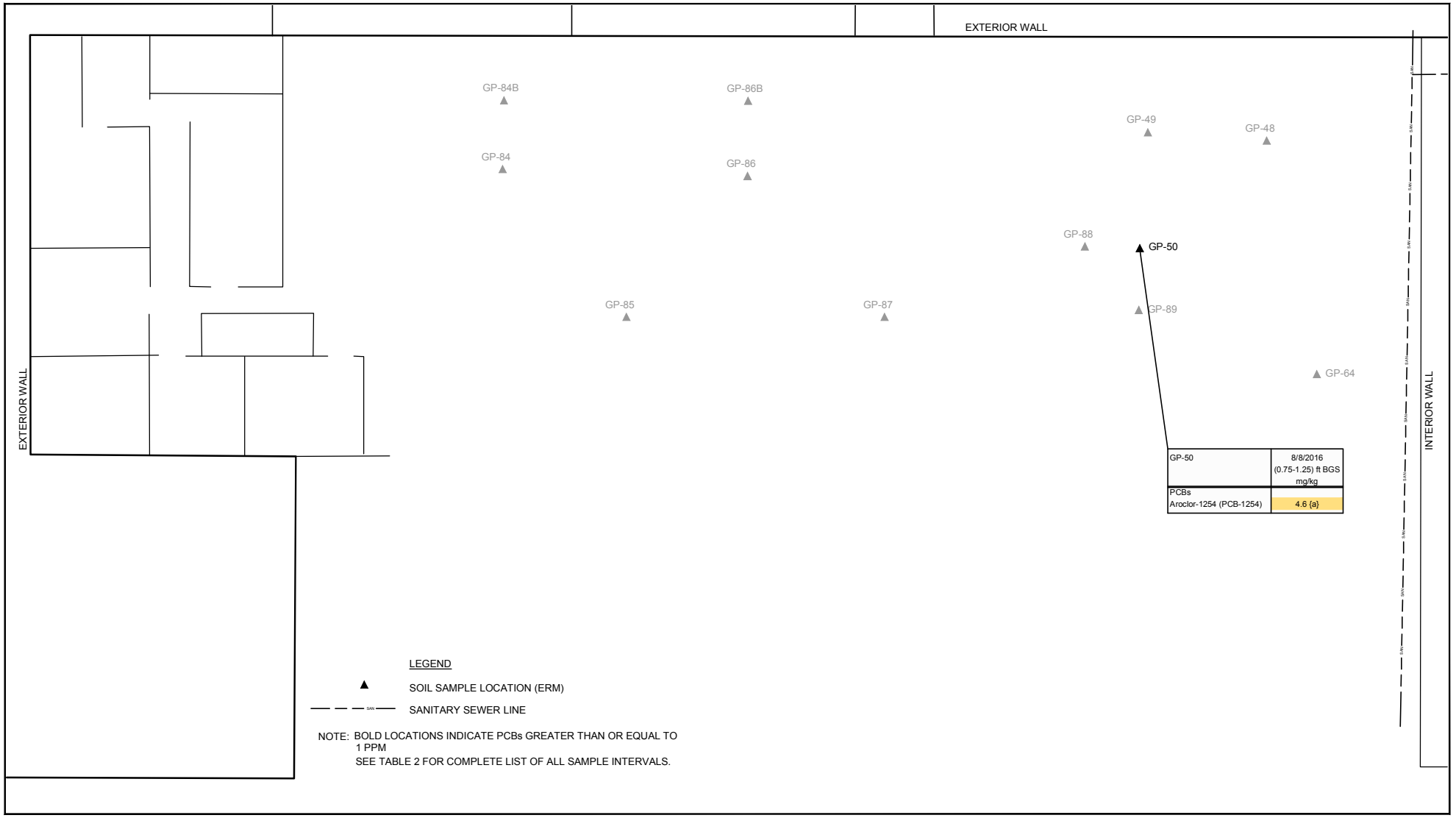
HAWORTH
200 BLUE STAR HIGHWAY
DOUGLAS, MICHIGAN

11152042-02
Jul 31, 2018

EAST ROOM PCB CONCRETE SAMPLE LOCATIONS AND RESULTS

FIGURE 4

CAD File: I:\drawings\11150000s\11152042\11152042-REPORTS\11152042-02(001)GN-DE004.dwg



0 5 10ft

Coordinate System:
STATE PLANE
MI-NAD83

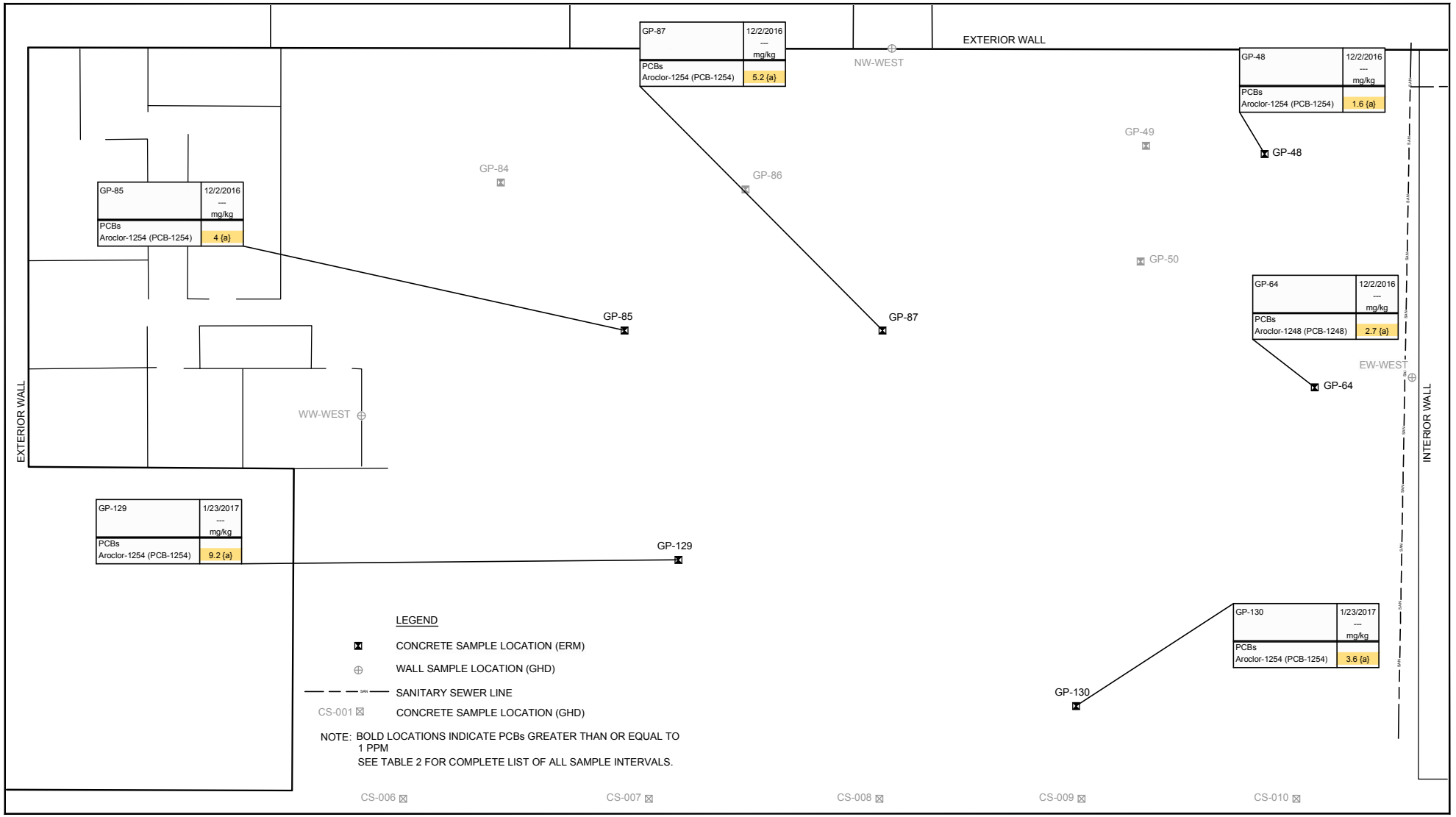
HAWORTH
200 BLUE STAR HIGHWAY
DOUGLAS, MICHIGAN

11152042-02
Jul 31, 2018

WEST ROOM PCB SOIL SAMPLE LOCATONS AND RESULTS

FIGURE 5

CAD File: I:\drawings\11150000s\11152042\11152042-REPORTS\11152042-02(001)GN-DE005.dwg



Source: Microsoft Product Screen Shot(s) Reprinted with permission from Microsoft Corporation, Acquisition Date [unknown], Accessed: 2018

0 5 10ft

Coordinate System:
STATE PLANE
MI-NAD83

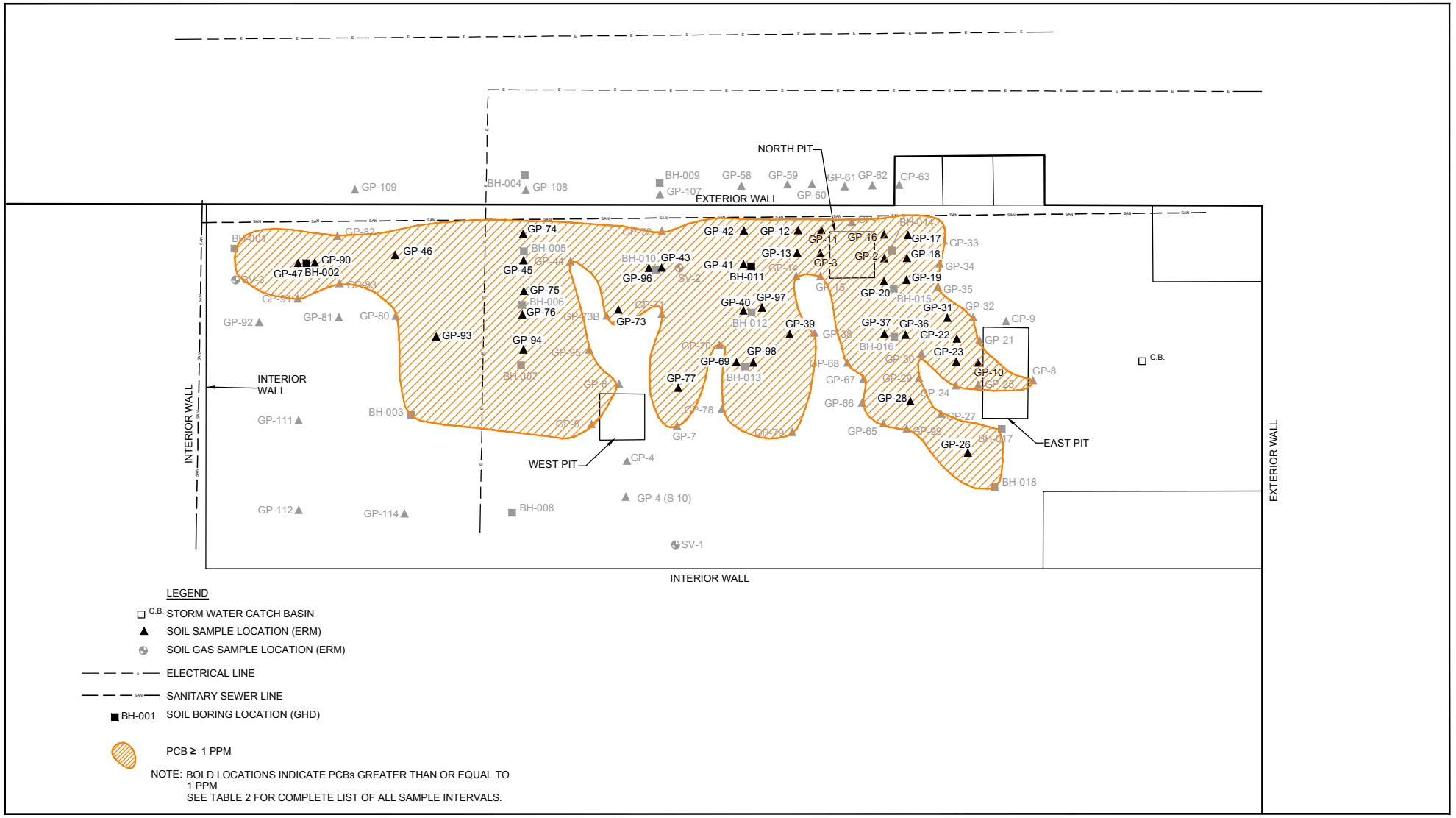
HAWORTH
200 BLUE STAR HIGHWAY
DOUGLAS, MICHIGAN

11152042-02
Jul 31, 2018

WEST ROOM PCB CONCRETE SAMPLE LOCATIONS AND RESULTS

FIGURE 6

CAD File: I:\drawings\11150000s\11152042\11152042-REPORTS\11152042-02(001)GN-DE006.dwg



LEGEND

- C.B. STORM WATER CATCH BASIN
- ▲ SOIL SAMPLE LOCATION (ERM)
- SOIL GAS SAMPLE LOCATION (ERM)
- ELECTRICAL LINE
- SANITARY SEWER LINE
- ■ BH-001 SOIL BORING LOCATION (GHD)
- PCB ≥ 1 PPM

NOTE: BOLD LOCATIONS INDICATE PCBs GREATER THAN OR EQUAL TO 1 PPM
SEE TABLE 2 FOR COMPLETE LIST OF ALL SAMPLE INTERVALS.

Source: Microsoft Product Screen Shot(s) Reprinted with permission from Microsoft Corporation, Acquisition Date [unknown], Accessed: 2018

0 10 20ft

Coordinate System:
STATE PLANE
MI-NAD83

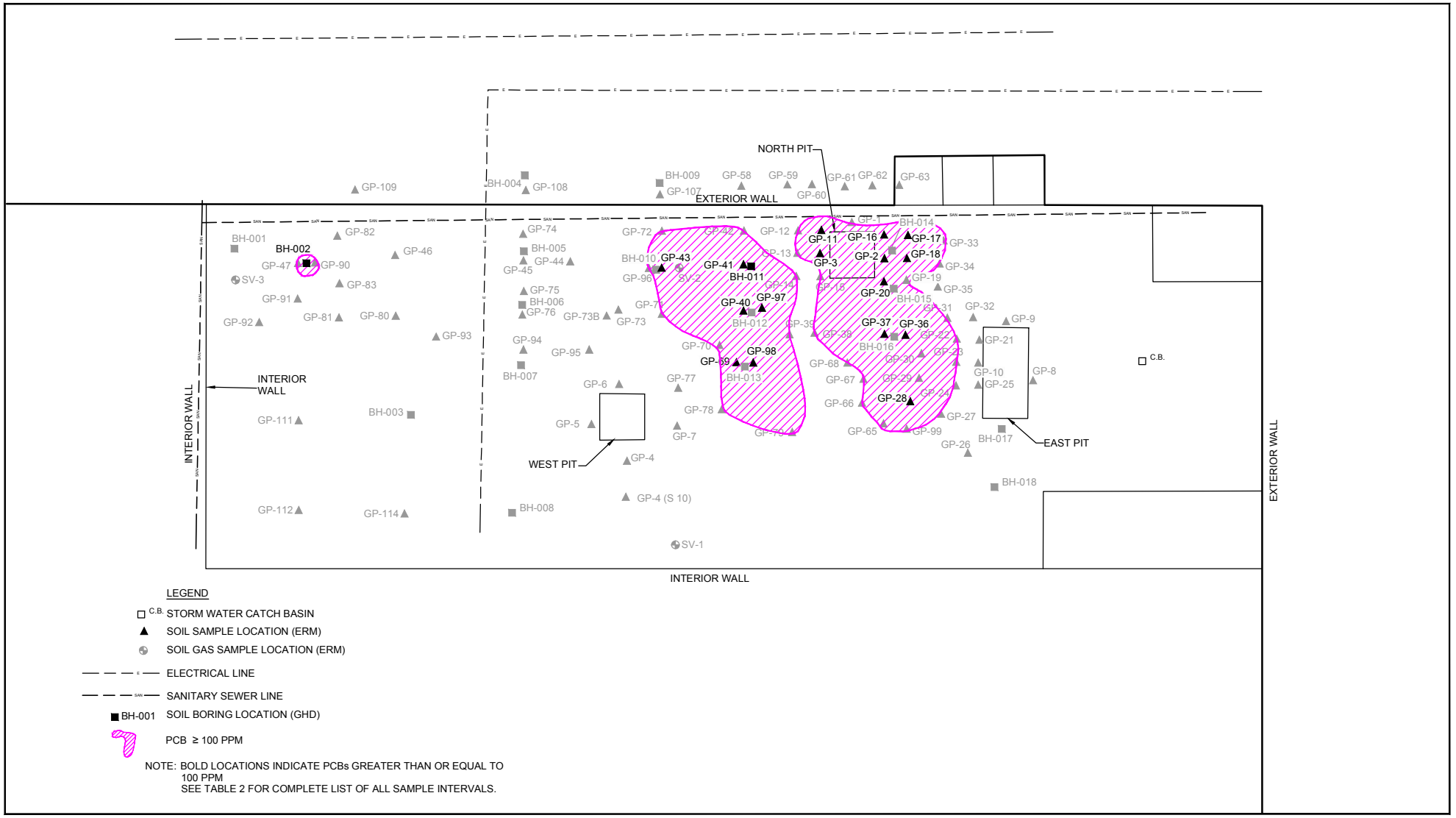
HAWORTH
200 BLUE STAR HIGHWAY
DOUGLAS, MICHIGAN

11152042-02
Jul 31, 2018

EAST ROOM SOIL DELIINEATION TO 1 PPM

FIGURE 7

CAD File: I:\drawings\11150000s\11152042\11152042-REPORTS\11152042-02(001)GN-DE010.dwg



LEGEND

- C.B. STORM WATER CATCH BASIN
- ▲ SOIL SAMPLE LOCATION (ERM)
- SOIL GAS SAMPLE LOCATION (ERM)
- ELECTRICAL LINE
- SANITARY SEWER LINE
- ■ BH-001 SOIL BORING LOCATION (GHD)
- PCB ≥ 100 PPM

NOTE: BOLD LOCATIONS INDICATE PCBs GREATER THAN OR EQUAL TO 100 PPM
SEE TABLE 2 FOR COMPLETE LIST OF ALL SAMPLE INTERVALS.

Source: Microsoft Product Screen Shot(s) Reprinted with permission from Microsoft Corporation, Acquisition Date [unknown], Accessed: 2018

0 10 20ft

Coordinate System:
STATE PLANE
MI-NAD83

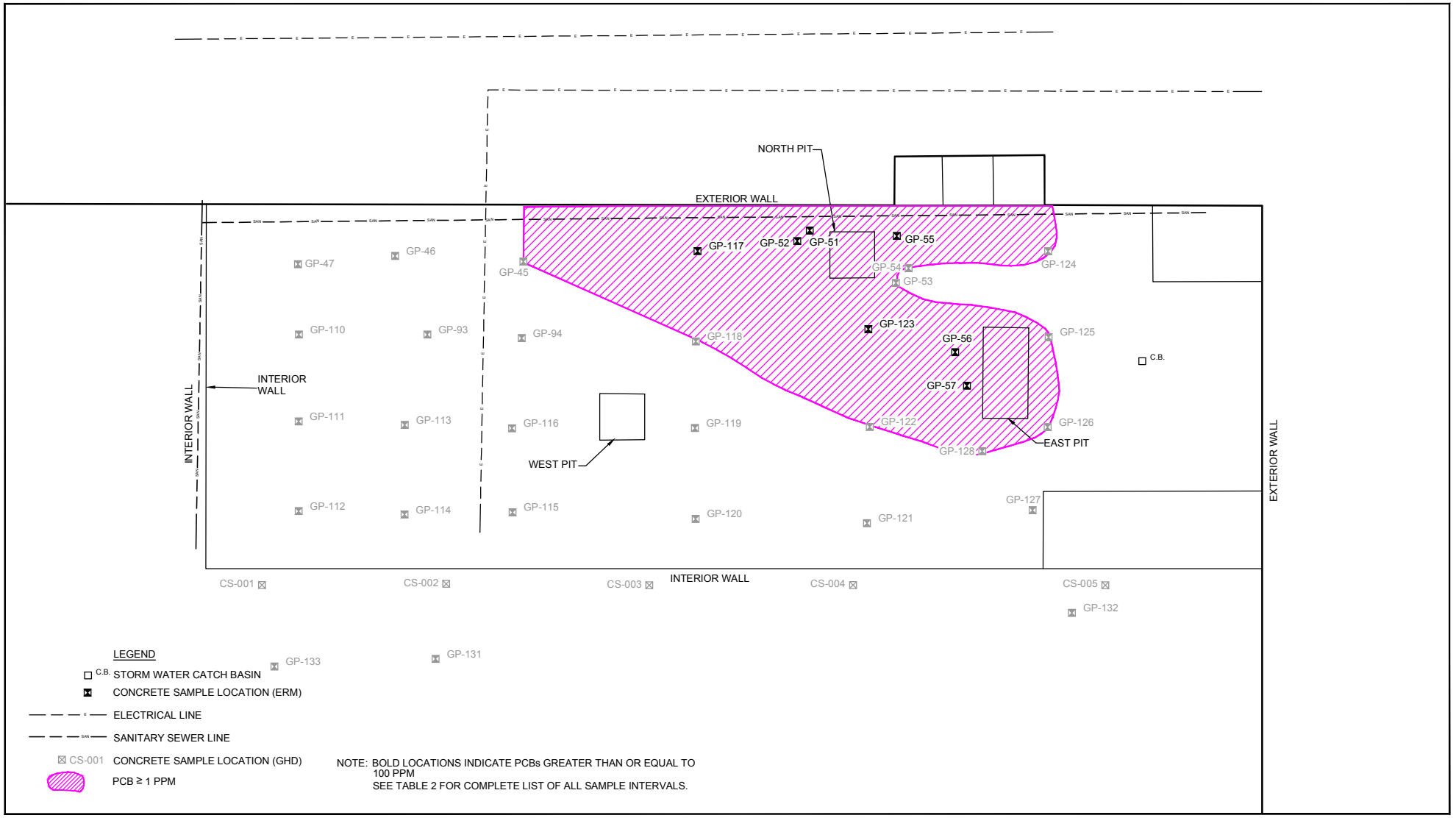
HAWORTH
200 BLUE STAR HIGHWAY
DOUGLAS, MICHIGAN

11152042-02
Jul 31, 2018

EAST ROOM SOIL DELINEATION TO 100 PPM

FIGURE 8

CAD File: I:\drawings\11150000s\11152042\11152042-REPORTS\11152042-02(001)GN-DE009.dwg



Source: Microsoft Product Screen Shot(s) Reprinted with permission from Microsoft Corporation, Acquisition Date [unknown], Accessed: 2018

0 10 20ft

Coordinate System:
STATE PLANE
MI-NAD83

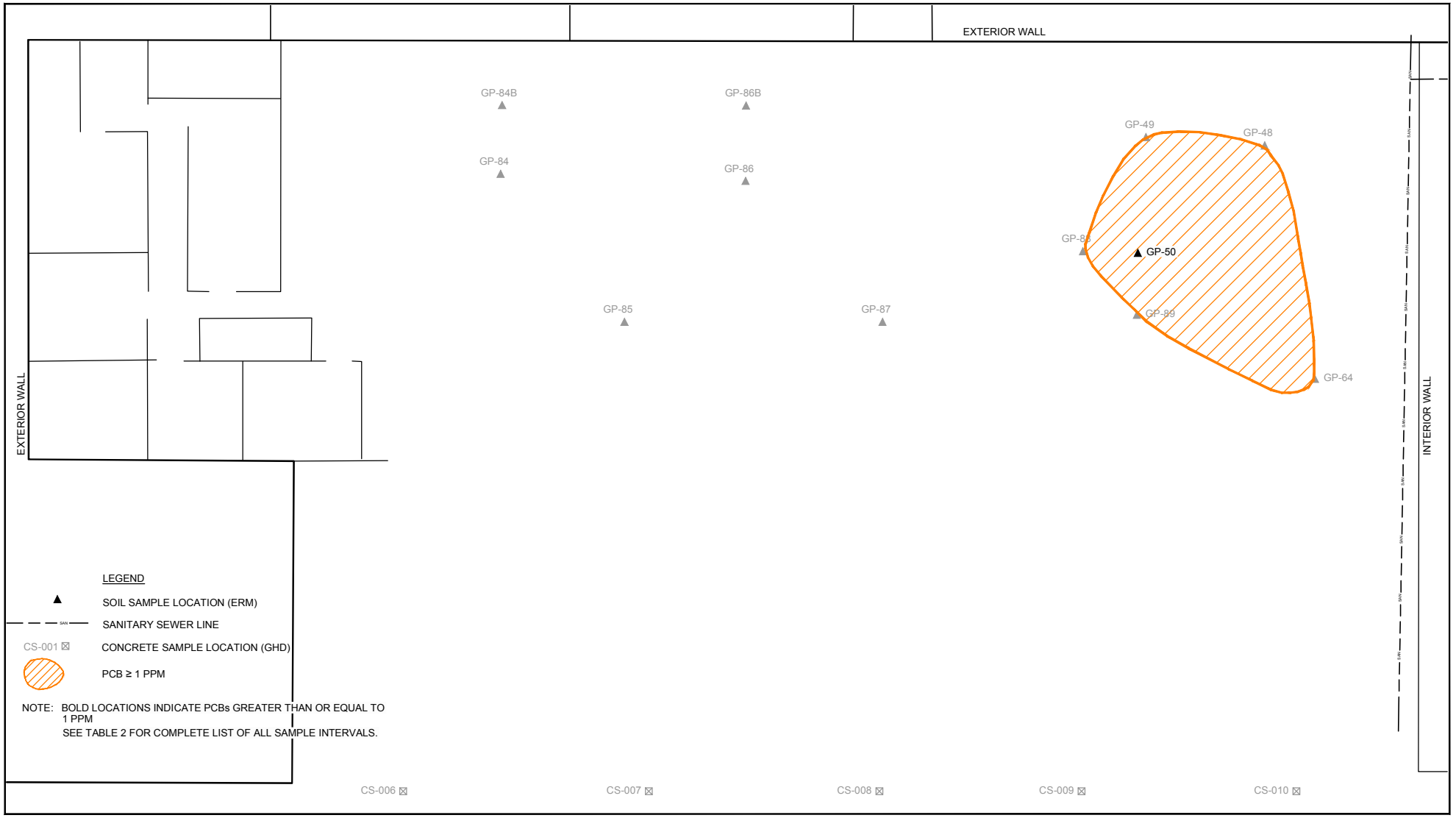
HAWORTH
200 BLUE STAR HIGHWAY
DOUGLAS, MICHIGAN

11152042-02
Jul 31, 2018

EAST ROOM CONCRETE DELINEATION TO 100 PPM

FIGURE 9

CAD File: I:\drawings\11150000s\11152042\11152042-REPORTS\11152042-02(001)GN-DE011.dwg



0 5 10ft

Coordinate System:
STATE PLANE
MI-NAD83

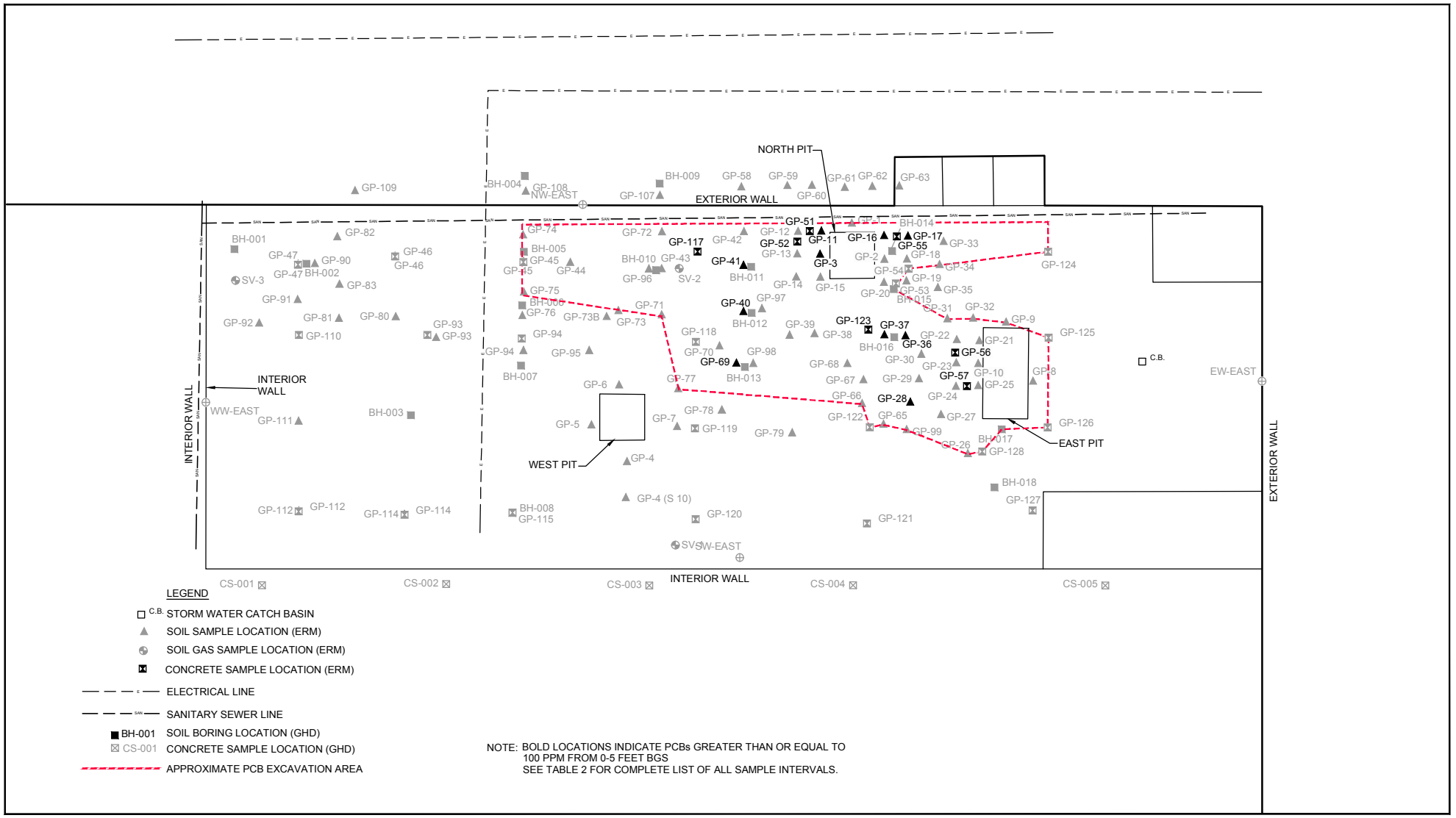
HAWORTH
200 BLUE STAR HIGHWAY
DOUGLAS, MICHIGAN

11152042-02
Jul 31, 2018

WEST ROOM SOIL DELINEATION TO 1 PPM

FIGURE 10

CAD File: I:\drawings\11150000s\11152042\11152042-REPORTS\11152042-02(001)GN-DE012.dwg



LEGEND

- C.B. STORM WATER CATCH BASIN
- SOIL SAMPLE LOCATION (ERM)
- SOIL GAS SAMPLE LOCATION (ERM)
- CONCRETE SAMPLE LOCATION (ERM)
- ELECTRICAL LINE
- SANITARY SEWER LINE
- BH-001 SOIL BORING LOCATION (GHD)
- CS-001 CONCRETE SAMPLE LOCATION (GHD)
- APPROXIMATE PCB EXCAVATION AREA

NOTE: BOLD LOCATIONS INDICATE PCBs GREATER THAN OR EQUAL TO 100 PPM FROM 0-5 FEET BGS
SEE TABLE 2 FOR COMPLETE LIST OF ALL SAMPLE INTERVALS.

Source: Microsoft Product Screen Shot(s) Reprinted with permission from Microsoft Corporation, Acquisition Date [unknown], Accessed: 2018

0 10 20ft

Coordinate System:
STATE PLANE
MI-NAD83

HAWORTH
200 BLUE STAR HIGHWAY
DOUGLAS, MICHIGAN

11152042-02
Jul 31, 2018

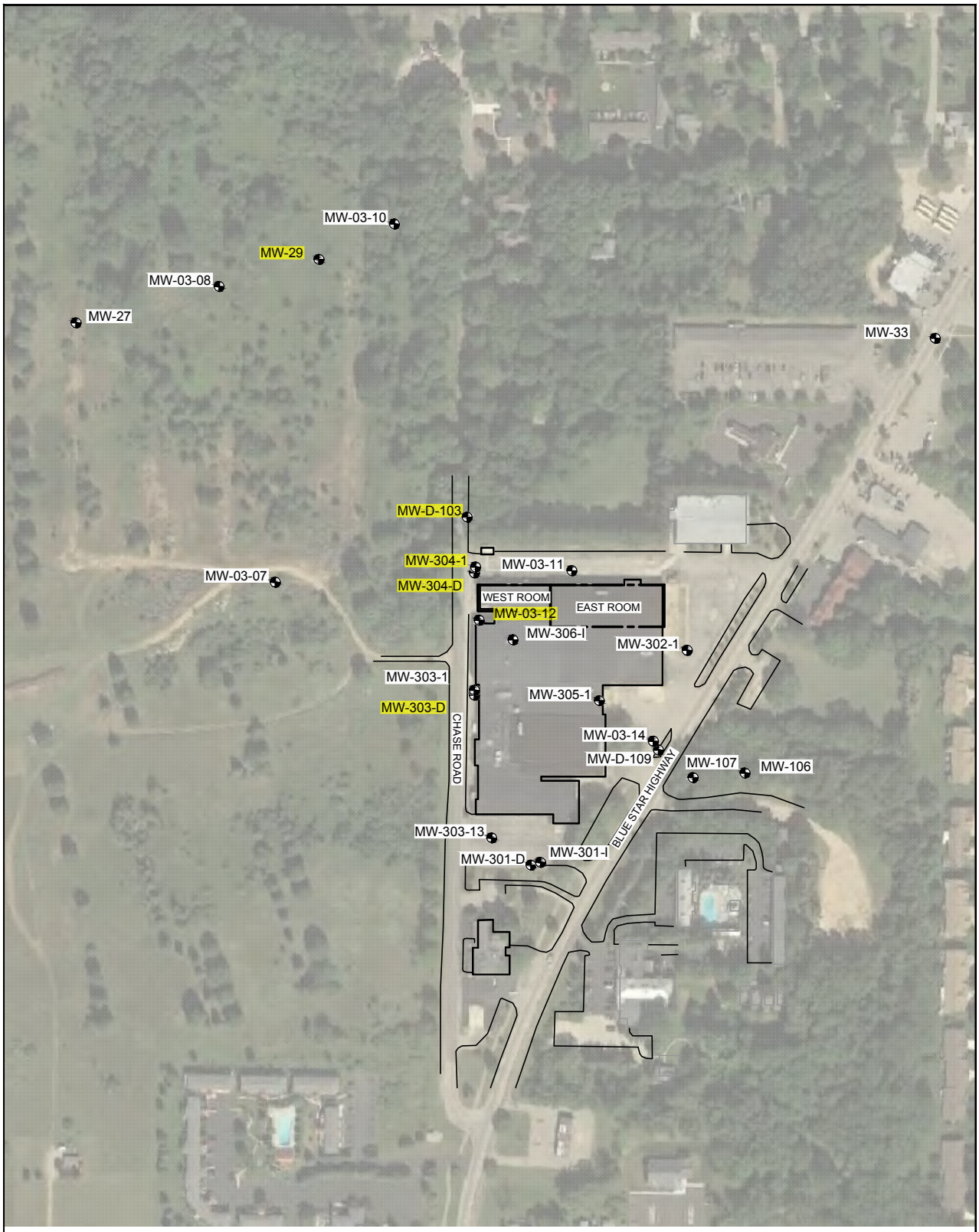
EAST ROOM EXCAVATION BOUNDARIES (5 FEET BGS)

FIGURE 11

CAD File: I:\drawings\11150000s\11152042\11152042-REPORTS\11152042-02(001)GN-DE013.dwg

Figure 6

Groundwater Sampling Results Map
Groundwater Sampling Results Summary
(GHD, 3/2019)



NOTE: WELL LOCATIONS FROM WESTON SOLUTIONS FIGURE 2

LEGEND

- AREA
- MW-D-103 INDICATES WELL SAMPLED
- MW-03-07 MONITORING WELL

Source: GOOGLE EARTH (DIGITAL GLOBE 9/9/2017)

0 100 200ft

Coordinate System:
STATE PLANE
MI-NAD83

HAWORTH
200 BLUE STAR HIGHWAY
DOUGLAS, MICHIGAN

11152042-04
Mar 12, 2019

SITE MAP MONITORING WELL LOCATIONS

FIGURE 2

CAD File: I:\drawings\11150000s\11152042\11152042-REPORTS\11152042-04(001)\11152042-04(001)GN-DE001.dwg

Figure 7

Soil and Concrete Sampling Results Maps
Phase II ESA
(Tetra Tech, 10/2022)

Legend

Approximate Site Boundary

Former Haworth Property Site
200 S. Blue Star Highway
Douglas, Allegan County, MI

Figure 2
Site Layout Map

TETRA TECH

Prepared For: US EPA	Prepared By: Tetra Tech

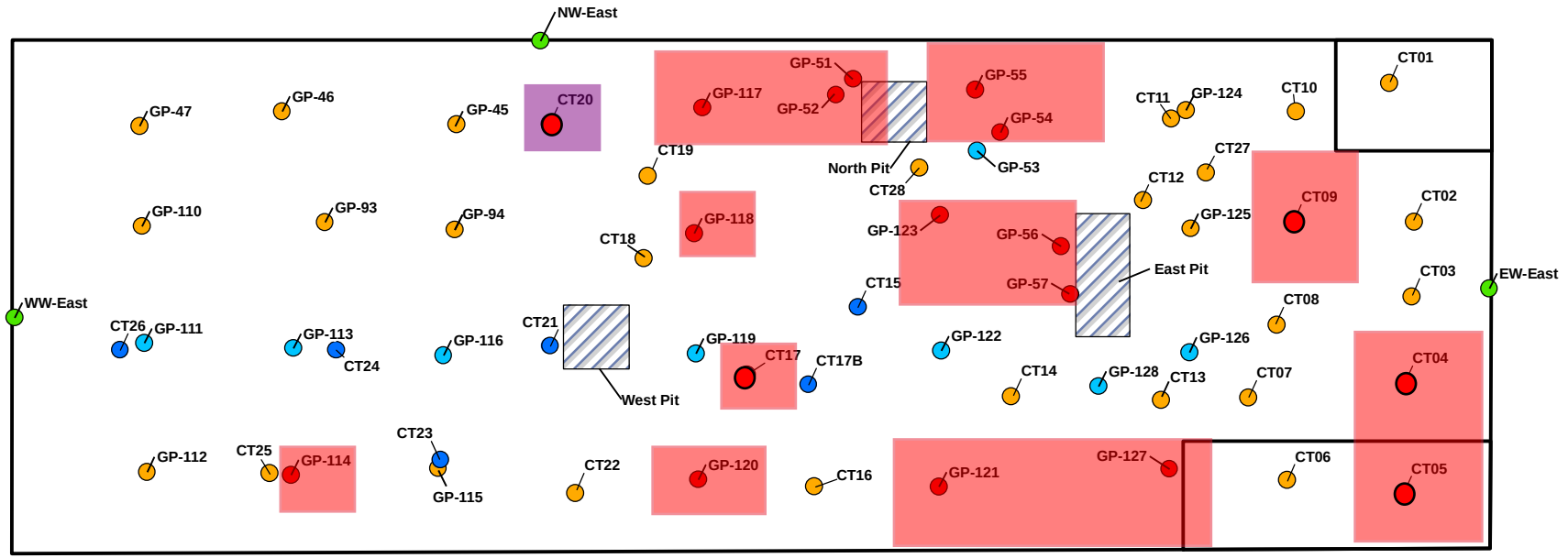
File Path: G:\IG\G9031-START V\Michigan\Former Haworth Property Site\mxd\Fig2-SiteLayout.mxd

Date Saved: 1/14/2022

EPA Contract No.: 68HE0519D0005

TO/TOLIN: F0107-0001CI110

Coordinate System: NAD 1983 StatePlane Michigan South FIPS 2113 Feet
Projection: Lambert Conformal Conic
Datum: North American 1983
Units: Foot US



Legend

- **Concrete Core Sample (Tetra Tech)** PCB < 1 mg/kg
- **Wall Sample Location (GHD)**
- **Concrete Sample (ERM) - Surficial samples with PCB below detection limit**
- **Concrete Sample - PCB between 1 and 50 mg/kg**
- **Concrete Sample - PCB > 50 mg/kg**

mg/kg = milligrams per kilogram

- **East Room**
- **Exceeds 50 mg/kg in shallow concrete (less than 12 inches)**
- **Exceeds 50 mg/kg in deep concrete (up to 36 inches)**

Former Haworth Property Site
200 S. Blue Star Highway
Douglas, Allegan County, MI

Figure 3
East Room
Concrete Sample Locations

TETRA TECH

Prepared For: US EPA	Prepared By: Tetra Tech

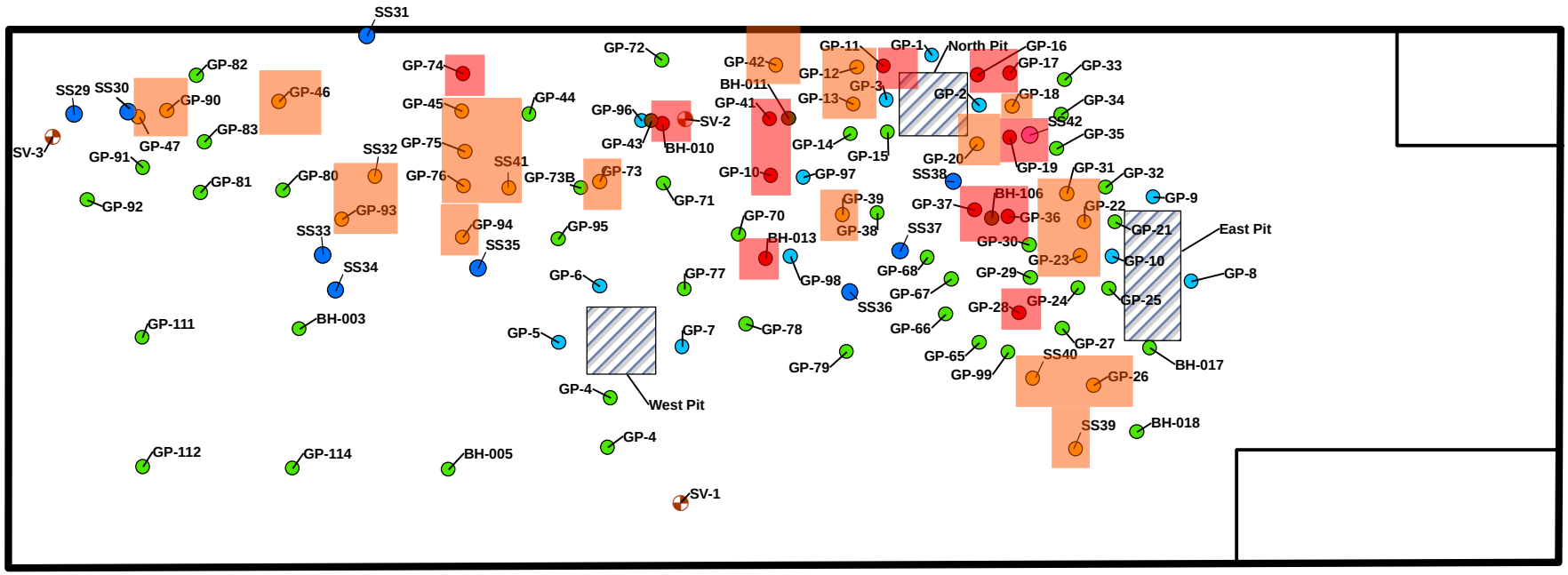
File Path: G:\G\G9031-START V\Michigan\Former Haworth Property Site\mxd\2022-09\Fig3-EastRoomConcreteSamples.mxd

Date Saved: 9/29/2022

EPA Contract No.: 68HE0519D0005

TO/TOLIN: F0107-0001CI110

Coordinate System: NAD 1983 StatePlane Michigan South FIPS 2113 Feet
Projection: Lambert Conformal Conic
Datum: North American 1983
Units: Foot US



20 0 20

Feet

Legend

- **Soil Boring (Tetra Tech)** PCBs < 1 mg/kg
- **Soil Sample Location (ERM) - no sample collected from the 0 to 4 foot depth interval**
- **Soil Sample Location - PCB Between 1 and 50 mg/kg**
- **PCB between 1 and 50 mg/kg**
- **PCB exceeds 50 mg/kg**
- Soil Sample Location (ERM) - PCB Below 1 mg/kg
- Soil Sample Location - PCB Exceeds 50 mg/kg
- Soil Sample Location (GRD)
- Soil Gas Sample Location (ERM)
- East Room

Note:
Sample PCB concentrations represent the 0 to 4 foot depth interval only.

Former Haworth Property Site
200 S. Blue Star Highway
Douglas, Allegan County, MI

Figure 4
East Room
Soil Sample Locations

TETRA TECH

Prepared For: US EPA | Prepared By: Tetra Tech

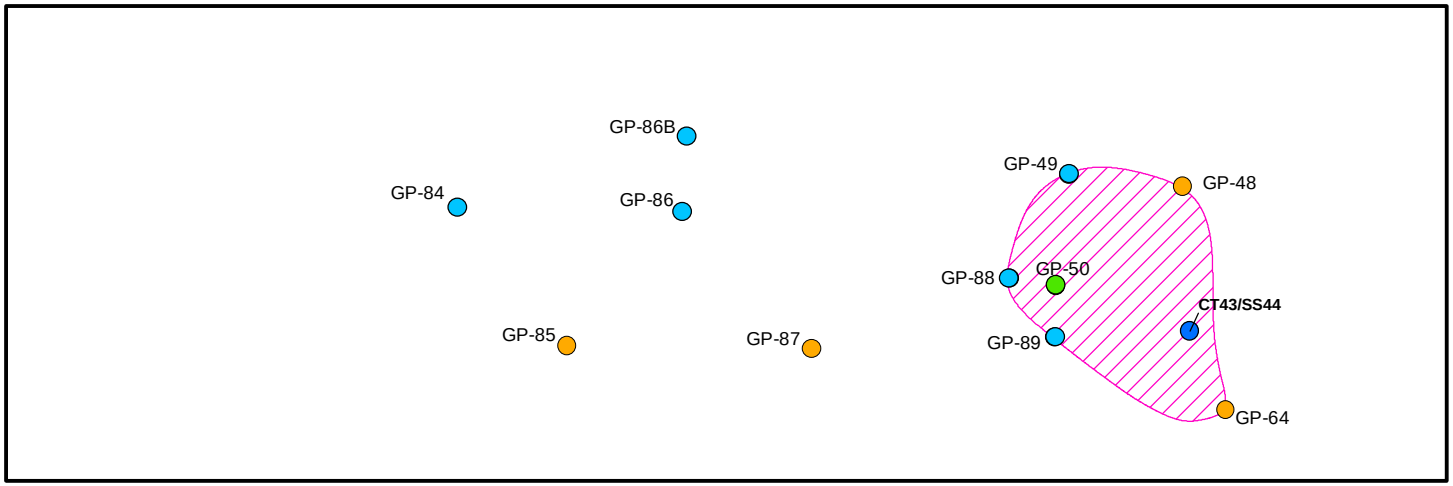
File Path: G:\G\G9031-START V\Michigan\Former Haworth Property Site\mxd\2022-09\Fig4-EastRoomSoilSamplesT.mxd

Date Saved: 9/30/2022

EPA Contract No.: 68HE0519D0005

TO/TOLIN: F0107-0001CI110

Coordinate System: NAD 1983 StatePlane Michigan South FIPS 2113 Feet
Projection: Lambert Conformal Conic
Datum: North American 1983
Units: Foot US



N

Legend

- Concrete and Soil Sample (Tetra Tech) PCB < 1 mg/kg
- Historic Concrete Sample PCB between 1 and 50 mg/kg
- Historic Soil Sample PCB between 1 and 50 mg/kg
- Historic Concrete or Soil Sample PCB < 1 mg/kg
- PCB-Contaminated Area- Soil
- West Room

10 0 10
Feet

Former Haworth Property Site
200 S. Blue Star Highway
Douglas, Allegan County, MI

Figure 5
West Room Sample Locations

TETRA TECH

Prepared For: US EPA | Prepared By: Tetra Tech

File Path: G:\G\G9031-START V\Michigan\Former Haworth Property Site\mxd\2022-09\Fig5-WestRoomSample.mxd

Date Saved: 10/4/2022

EPA Contract No.: 68HE0519D0005

TO/TOLIN: F0107-0001CI110

Coordinate System: NAD 1983 StatePlane Michigan South FIPS 2113 Feet
Projection: Lambert Conformal Conic
Datum: North American 1983
Units: Foot US

TABLES

Table 1

Site Investigation Data Tables
Phase II ESA
(ERM, 2015)

Table 1 - Summary of Soil Sampling Results
Haworth - Douglas
200 Blue Star Hwy, Douglas, Michigan

Parameter	CAS Number	Analytical Results																				
		Drinking Water Protection Criteria		Soil Volatilization to Indoor Air Inhalation Criteria		Direct Contact Criteria		TSCA, Subpart D Cleanup Standards		Groundwater Surface Water Interface Protection Criteria	GP-1 5'	GP-1 8'	GP-1 15'	GP-2 5'	GP-2 8'	GP-2 15'	GP-3 5'	GP-3 10'	GP-3 15'	GP-4 3'	GP-4 (S10) 5'
		Residential	Non Residential	Residential	Non Residential	Residential	Non Residential	Uncapped	Capped		9/21/2015	9/21/2015	9/21/2015	9/21/2015	9/21/2015	9/21/2015	9/21/2015	9/21/2015	9/21/2015	9/21/2015	9/22/2015
PCBs USEPA 8082 (µg/Kg)																						
Aroclor 1248	12672-29-6	NLL	NLL	5,200,000	16,000,000	4,000	16,000	1,000	10,000	NLL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
Aroclor 1254	11097-69-1	NLL	NLL	5,200,000	16,000,000	**4,000**	**16,000**	**1,000**	**10,000**	NLL	BDL	BDL	BDL	**1,300**	BDL	BDL	**1,800,000**	**38,000**	BDL	**160**	BDL

Analytical Results																			
GP-4 (S10) 8'	GP-4 (S10) 15'	GP-5 5'	GP-5 8'	GP-5 15'	GP-6 5'	GP-6 8'	GP-6 15'	GP-7 5'	GP-7 8'	GP-7 15'	GP-8 5'	GP-8 8'	GP-8 15'	GP-9 5'	GP-9 8'	GP-9 15'	GP-10 5'	GP-10 8'	GP-10 15'
9/22/2015	9/22/2015	9/21/2015	9/21/2015	9/21/2015	9/22/2015	9/22/2015	9/22/2015	9/22/2015	9/22/2015	9/22/2015	9/22/2015	9/22/2015	9/22/2015	9/22/2015	9/22/2015	9/22/2015	9/22/2015	9/22/2015	9/22/2015
BDL	BDL	BDL	BDL	BDL	**340**	BDL	BDL	**98**	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
BDL	BDL	**82**	BDL	BDL	**150**	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	**110**	**2,100**	**270**

Notes:
- Cleanup criteria per MDEQ RRD Operational Memorandum #1, Attachment 1, 12/30/13.
- BDL Indicates Below Detection Limit.
- NLL Indicates parameter is not likely to leach under most soil conditions.
- Red values exceed the referenced residential direct contact criteria.
- Red boarder color cell exceed the referenced non-residential direct contact criteria.
- Yellow highlighted cells exceed TSCA uncapped cleanup standard.
- Cross hatched cells exceed TSCA capped cleanup standard.

Buckman

ERM

Table 2

Site Investigation Data Tables
PCB Cleanup and Application Risk-Based Disposal and Approval
(GHD, 12/2015 – 6/2018)

Table 2

Summary of Soil Analytical Results
Former Douglas Michigan Facility
200 Blue Star Highway
Douglas, Michigan 49406

Area				EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST
Sample Location:				BH-002	BH-003	BH-003	BH-003	BH-003	BH-003	BH-004	BH-004	BH-004	BH-009	BH-009
Sample Date:				6/26/2018	6/27/2018	6/27/2018	6/27/2018	6/27/2018	6/27/2018	6/26/2018	6/26/2018	6/26/2018	6/26/2018	6/26/2018
Sample Depth:				(11-12) ft BGS	(1-2) ft BGS	(4-5) ft BGS	(9-10) ft BGS	(14-15) ft BGS	(19-20) ft BGS	(9-10) ft BGS	(14-15) ft BGS	(19-20) ft BGS	(9-10) ft BGS	(14-15) ft BGS
Matrix		a	b	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil
	Units													
PCBs														
Aroclor-1016 (PCB-1016)	mg/kg	1	100	5.3 U	0.055 U	0.054 U	0.064 U	0.06 U	0.058 U	0.057 U	0.064 U	0.052 U	0.06 U	0.062 U
Aroclor-1221 (PCB-1221)	mg/kg	1	100	5.3 U	0.055 U	0.054 U	0.064 U	0.06 U	0.058 U	0.057 U	0.064 U	0.052 U	0.06 U	0.062 U
Aroclor-1232 (PCB-1232)	mg/kg	1	100	5.3 U	0.055 U	0.054 U	0.064 U	0.06 U	0.058 U	0.057 U	0.064 U	0.052 U	0.06 U	0.062 U
Aroclor-1242 (PCB-1242)	mg/kg	1	100	5.3 U	0.055 U	0.054 U	0.064 U	0.06 U	0.058 U	0.057 U	0.064 U	0.052 U	0.06 U	0.062 U
Aroclor-1248 (PCB-1248)	mg/kg	1	100	5.3 U	0.055 U	0.054 U	0.064 U	0.06 U	0.058 U	0.057 U	0.064 U	0.052 U	0.06 U	0.062 U
Aroclor-1254 (PCB-1254)	mg/kg	1	100	**110[ab]**	0.055 U	0.054 U	0.064 U	0.06 U	0.058 U	0.057 U	0.064 U	0.052 U	0.06 U	0.062 U
Aroclor-1260 (PCB-1260)	mg/kg	1	100	5.3 U	0.055 U	0.054 U	0.064 U	0.06 U	0.058 U	0.057 U	0.064 U	0.052 U	0.06 U	0.062 U
Total PCBs	mg/kg	1	100	**110[ab]**	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND

Area				EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST
Sample Location:				BH-009	BH-010	BH-011	BH-017	BH-017	BH-017	BH-017	BH-018	BH-018	BH-018	BH-018
Sample Date:				6/26/2018	6/27/2018	6/26/2018	6/27/2018	6/27/2018	6/27/2018	6/27/2018	6/27/2018	6/27/2018	6/27/2018	6/27/2018
Sample Depth:				(19-20) ft BGS	(19-20) ft BGS	(11-12) ft BGS	(1-2) ft BGS	(4-5) ft BGS	(9-10) ft BGS	(9-10) ft BGS	(1-2) ft BGS	(4-5) ft BGS	(9-10) ft BGS	(14-15) ft BGS
Matrix		a	b	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil
	Units									Duplicate				
PCBs														
Aroclor-1016 (PCB-1016)	mg/kg	1	100	0.055 U	0.05 U	1100 U	0.051 U	0.056 U	0.06 U	0.061 U	0.057 U	0.049 U	0.059 U	0.06 U
Aroclor-1221 (PCB-1221)	mg/kg	1	100	0.055 U	0.05 U	1100 U	0.051 U	0.056 U	0.06 U	0.061 U	0.057 U	0.049 U	0.059 U	0.06 U
Aroclor-1232 (PCB-1232)	mg/kg	1	100	0.055 U	0.05 U	1100 U	0.051 U	0.056 U	0.06 U	0.061 U	0.057 U	0.049 U	0.059 U	0.06 U
Aroclor-1242 (PCB-1242)	mg/kg	1	100	0.055 U	0.05 U	1100 U	0.051 U	0.056 U	0.06 U	0.061 U	0.057 U	0.049 U	0.059 U	0.06 U
Aroclor-1248 (PCB-1248)	mg/kg	1	100	0.055 U	0.05 U	1100 U	0.051 U	0.16	0.06 U	0.061 U	0.057 U	0.049 U	0.059 U	0.06 U
Aroclor-1254 (PCB-1254)	mg/kg	1	100	0.055 U	0.05 U	**17000[ab]**	0.46	0.056 U	0.28	0.24	0.3	0.049 U	0.059 U	0.06 U
Aroclor-1260 (PCB-1260)	mg/kg	1	100	0.055 U	0.05 U	1100 U	0.051 U	0.056 U	0.06 U	0.061 U	0.057 U	0.049 U	0.059 U	0.06 U
Total PCBs	mg/kg	1	100	ND	ND	**17000[ab]**	0.46	0.16	0.28	0.24	0.3	ND	ND	ND

Area				EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST
Sample Location:				BH-018	GP-1	GP-1	GP-1	GP-2	GP-2	GP-2	GP-3	GP-3	GP-3	GP-4
Sample Date:				6/27/2018	9/21/2015	9/21/2015	9/21/2015	9/21/2015	9/21/2015	9/21/2015	9/21/2015	9/21/2015	9/21/2015	9/21/2015
Sample Depth:				(19-20) ft BGS	(5) ft BGS	(8) ft BGS	(15) ft BGS	(5) ft BGS	(8) ft BGS	(15) ft BGS	(5) ft BGS	(10) ft BGS	(15) ft BGS	(3) ft BGS
Matrix		a	b	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil
	Units													
PCBs														
Aroclor-1016 (PCB-1016)	mg/kg	1	100	0.059 U	--	--	--	--	--	--	--	--	--	--
Aroclor-1221 (PCB-1221)	mg/kg	1	100	0.059 U	--	--	--	--	--	--	--	--	--	--
Aroclor-1232 (PCB-1232)	mg/kg	1	100	0.059 U	--	--	--	--	--	--	--	--	--	--
Aroclor-1242 (PCB-1242)	mg/kg	1	100	0.059 U	--	--	--	--	--	--	--	--	--	--
Aroclor-1248 (PCB-1248)	mg/kg	1	100	0.059 U	--	--	--	--	--	--	--	--	--	--
Aroclor-1254 (PCB-1254)	mg/kg	1	100	0.059 U	--	--	--	--	--	--	--	--	--	--
Aroclor-1260 (PCB-1260)	mg/kg	1	100	0.059 U	--	--	--	--	--	--	--	--	--	--
Total PCBs	mg/kg	1	100	ND	BDL	BDL	BDL	**1.3[a]**	BDL	BDL	**1800[ab]**	**38[a]**	BDL	0.16

Table 2

Summary of Soil Analytical Results
Former Douglas Michigan Facility
200 Blue Star Highway
Douglas, Michigan 49406

Area				EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST
Sample Location:				GP-4 (S 10)	GP-4 (S 10)	GP-4 (S 10)	GP-5	GP-5	GP-5	GP-6	GP-6	GP-6	GP-7	GP-7
Sample Date:				9/22/2015	9/22/2015	9/22/2015	9/21/2015	9/21/2015	9/21/2015	9/22/2015	9/22/2015	9/22/2015	9/22/2015	9/22/2015
Sample Depth:				(5) ft BGS	(8) ft BGS	(15) ft BGS	(5) ft BGS	(8) ft BGS	(15) ft BGS	(5) ft BGS	(8) ft BGS	(15) ft BGS	(5) ft BGS	(8) ft BGS
Matrix		a	b	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil
	Units													
PCBs														
Aroclor-1016 (PCB-1016)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1221 (PCB-1221)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1232 (PCB-1232)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1242 (PCB-1242)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1248 (PCB-1248)	mg/kg	1	100	--	BDL	BDL	BDL	BDL	BDL	0.34	BDL	BDL	0.098	BDL
Aroclor-1254 (PCB-1254)	mg/kg	1	100	--	BDL	BDL	0.082	BDL	BDL	0.15	BDL	BDL	BDL	BDL
Aroclor-1260 (PCB-1260)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Total PCBs	mg/kg	1	100	BDL	--	--	--	--	--	--	--	--	--	--

Area				EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST
Sample Location:				GP-7	GP-8	GP-8	GP-8	GP-9	GP-9	GP-9	GP-10	GP-10	GP-10	GP-11
Sample Date:				9/22/2015	9/22/2015	9/22/2015	9/22/2015	9/22/2015	9/22/2015	9/22/2015	9/22/2015	9/22/2015	9/22/2015	12/17/2015
Sample Depth:				(15) ft BGS	(5) ft BGS	(8) ft BGS	(15) ft BGS	(5) ft BGS	(8) ft BGS	(15) ft BGS	(5) ft BGS	(8) ft BGS	(15) ft BGS	(1.2-2) ft BGS
Matrix		a	b	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil
	Units													
PCBs														
Aroclor-1016 (PCB-1016)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1221 (PCB-1221)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1232 (PCB-1232)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1242 (PCB-1242)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1248 (PCB-1248)	mg/kg	1	100	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	**48[a]**
Aroclor-1254 (PCB-1254)	mg/kg	1	100	BDL	BDL	BDL	BDL	BDL	BDL	BDL	0.11	**2.1[a]**	0.27	**41[a]**
Aroclor-1260 (PCB-1260)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Total PCBs	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--

Area				EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST
Sample Location:				GP-11	GP-11	GP-11	GP-12	GP-12	GP-12	GP-12	GP-13	GP-13	GP-13	GP-13
Sample Date:				12/17/2015	12/18/2015	12/18/2015	12/17/2015	12/17/2015	12/18/2015	12/18/2015	12/17/2015	12/17/2015	12/17/2015	12/17/2015
Sample Depth:				(5-5.5) ft BGS	(10-10.5) ft BGS	(14.5-15) ft BGS	(1-1.5) ft BGS	(5-5.5) ft BGS	(10-10.5) ft BGS	(14.5-15) ft BGS	(1.45-2) ft BGS	(5-5.5) ft BGS	(10-10.5) ft BGS	(14.5-15) ft BGS
Matrix		a	b	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil
	Units													
PCBs														
Aroclor-1016 (PCB-1016)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1221 (PCB-1221)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1232 (PCB-1232)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1242 (PCB-1242)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1248 (PCB-1248)	mg/kg	1	100	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
Aroclor-1254 (PCB-1254)	mg/kg	1	100	**130[ab]**	BDL	BDL	**2.3[a]**	**3.3[a]**	BDL	BDL	**3.5[a]**	0.46	BDL	BDL
Aroclor-1260 (PCB-1260)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Total PCBs	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--

Table 2

Summary of Soil Analytical Results
Former Douglas Michigan Facility
200 Blue Star Highway
Douglas, Michigan 49406

Area				EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST
Sample Location:				GP-14	GP-14	GP-14	GP-14	GP-15	GP-15	GP-15	GP-15	GP-16	GP-16	GP-16
Sample Date:				12/17/2015	12/17/2015	12/17/2015	12/17/2015	12/17/2015	12/17/2015	12/17/2015	12/17/2015	12/18/2015	12/18/2015	12/18/2015
Sample Depth:				(1-1.5) ft BGS	(5-5.5) ft BGS	(10-10.5) ft BGS	(14.5-15) ft BGS	(2.3-2.8) ft BGS	(5-5.5) ft BGS	(10-10.5) ft BGS	(14.5-15) ft BGS	(1-1.5) ft BGS	(5-5.5) ft BGS	(10-10.5) ft BGS
Matrix		a	b	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil
	Units													
PCBs														
Aroclor-1016 (PCB-1016)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1221 (PCB-1221)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1232 (PCB-1232)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1242 (PCB-1242)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1248 (PCB-1248)	mg/kg	1	100	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
Aroclor-1254 (PCB-1254)	mg/kg	1	100	0.29	BDL	BDL	BDL	0.26	BDL	BDL	BDL	**9500[ab]**	**2900[ab]**	**3.5[a]**
Aroclor-1260 (PCB-1260)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Total PCBs	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--

Area				EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST
Sample Location:				GP-16	GP-17	GP-17	GP-17	GP-17	GP-18	GP-18	GP-18	GP-18	GP-19	GP-19
Sample Date:				12/18/2015	12/17/2015	12/17/2015	12/17/2015	12/17/2015	12/18/2015	12/18/2015	12/18/2015	12/18/2015	12/18/2015	12/18/2015
Sample Depth:				(14.5-15) ft BGS	(1-1.5) ft BGS	(5-5.5) ft BGS	(10-10.5) ft BGS	(14.5-15) ft BGS	(1-1.5) ft BGS	(5-5.5) ft BGS	(10-10.5) ft BGS	(14.5-15) ft BGS	(0.8-1.2) ft BGS	(5-5.5) ft BGS
Matrix		a	b	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil
	Units													
PCBs														
Aroclor-1016 (PCB-1016)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1221 (PCB-1221)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1232 (PCB-1232)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1242 (PCB-1242)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1248 (PCB-1248)	mg/kg	1	100	**2.6[a]**	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
Aroclor-1254 (PCB-1254)	mg/kg	1	100	**1.2[a]**	**12000[ab]**	**70[a]**	**3.4[a]**	**1.3[a]**	**3.4[a]**	**2[a]**	**3.4[a]**	**2000[ab]**	**52[a]**	**33[a]**
Aroclor-1260 (PCB-1260)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Total PCBs	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--

Area				EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST
Sample Location:				GP-19	GP-19	GP-20	GP-20	GP-20	GP-21	GP-21	GP-21	GP-21	GP-22	GP-22
Sample Date:				12/18/2015	12/18/2015	12/18/2015	12/18/2015	12/18/2015	12/18/2015	12/18/2015	12/18/2015	12/18/2015	12/18/2015	12/18/2015
Sample Depth:				(10-10.5) ft BGS	(14.5-15) ft BGS	(1-1.5) ft BGS	(5-5.5) ft BGS	(10-10.5) ft BGS	(1.2-1.7) ft BGS	(5-5.5) ft BGS	(10-10.5) ft BGS	(14.5-15) ft BGS	(1.2-1.7) ft BGS	(5-5.5) ft BGS
Matrix		a	b	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil
	Units													
PCBs														
Aroclor-1016 (PCB-1016)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1221 (PCB-1221)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1232 (PCB-1232)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1242 (PCB-1242)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1248 (PCB-1248)	mg/kg	1	100	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
Aroclor-1254 (PCB-1254)	mg/kg	1	100	**9.7[a]**	**9.1[a]**	**35[a]**	**9.3[a]**	**2.2[a]**	0.37	BDL	BDL	BDL	**7.9[a]**	0.25
Aroclor-1260 (PCB-1260)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Total PCBs	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--

Table 2

Summary of Soil Analytical Results
Former Douglas Michigan Facility
200 Blue Star Highway
Douglas, Michigan 49406

Area				EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST
Sample Location:				GP-22	GP-22	GP-23	GP-23	GP-23	GP-23	GP-24	GP-24	GP-24	GP-24	GP-25
Sample Date:				12/18/2015	12/18/2015	12/18/2015	12/18/2015	12/18/2015	12/18/2015	12/18/2015	12/18/2015	12/18/2015	12/18/2015	12/18/2015
Sample Depth:				(10-10.5) ft BGS	(14.5-15) ft BGS	(1.2-1.7) ft BGS	(5-5.5) ft BGS	(10-10.5) ft BGS	(14.5-15) ft BGS	(1-1.5) ft BGS	(5-5.5) ft BGS	(10-10.5) ft BGS	(14.5-15) ft BGS	(1-1.5) ft BGS
Matrix		a	b	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil
	Units													
PCBs														
Aroclor-1016 (PCB-1016)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1221 (PCB-1221)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1232 (PCB-1232)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1242 (PCB-1242)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1248 (PCB-1248)	mg/kg	1	100	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
Aroclor-1254 (PCB-1254)	mg/kg	1	100	0.2	BDL	**7.1[a]**	BDL	0.31	BDL	0.16	BDL	BDL	BDL	0.096
Aroclor-1260 (PCB-1260)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Total PCBs	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--

Area				EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST
Sample Location:				GP-25	GP-25	GP-25	GP-26	GP-26	GP-26	GP-26	GP-26	GP-27	GP-28	GP-28
Sample Date:				12/18/2015	12/18/2015	12/18/2015	8/9/2016	8/9/2016	8/9/2016	8/9/2016	8/9/2016	8/9/2016	8/9/2016	8/9/2016
Sample Depth:				(5-5.5) ft BGS	(10-10.5) ft BGS	(14.5-15) ft BGS	(0.5-1) ft BGS	(5-5.5) ft BGS	(10-10.5) ft BGS	(15-15.5) ft BGS	(19.5-20) ft BGS	(0.5-1) ft BGS	(1-1.5) ft BGS	(5-5.5) ft BGS
Matrix		a	b	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil
	Units													
PCBs														
Aroclor-1016 (PCB-1016)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1221 (PCB-1221)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1232 (PCB-1232)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1242 (PCB-1242)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1248 (PCB-1248)	mg/kg	1	100	0.88	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
Aroclor-1254 (PCB-1254)	mg/kg	1	100	0.41	BDL	BDL	**2.3[a]**	**1.9[a]**	**1.6[a]**	BDL	BDL	0.85	**580[ab]**	**130[ab]**
Aroclor-1260 (PCB-1260)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Total PCBs	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--

Area				EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST
Sample Location:				GP-28	GP-28	GP-29	GP-29	GP-29	GP-29	GP-29	GP-30	GP-30	GP-30	GP-30
Sample Date:				8/9/2016	8/9/2016	8/9/2016	8/9/2016	8/9/2016	8/9/2016	8/9/2016	8/9/2016	8/9/2016	8/9/2016	8/9/2016
Sample Depth:				(10-10.5) ft BGS	(15-15.5) ft BGS	(1-1.5) ft BGS	(5-5.5) ft BGS	(10-10.5) ft BGS	(15-15.5) ft BGS	(19.5-20) ft BGS	(1.1-1.6) ft BGS	(5-5.5) ft BGS	(10-10.5) ft BGS	(15-15.5) ft BGS
Matrix		a	b	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil
	Units													
PCBs														
Aroclor-1016 (PCB-1016)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1221 (PCB-1221)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1232 (PCB-1232)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1242 (PCB-1242)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1248 (PCB-1248)	mg/kg	1	100	**3.1[a]**	BDL	0.58	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
Aroclor-1254 (PCB-1254)	mg/kg	1	100	BDL	**560[ab]**	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
Aroclor-1260 (PCB-1260)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Total PCBs	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--

Table 2

Summary of Soil Analytical Results
Former Douglas Michigan Facility
200 Blue Star Highway
Douglas, Michigan 49406

Area				EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST
Sample Location:				GP-30	GP-31	GP-31	GP-31	GP-31	GP-31	GP-32	GP-32	GP-32	GP-32	GP-32
Sample Date:				8/9/2016	8/10/2016	8/10/2016	8/10/2016	8/10/2016	8/10/2016	8/9/2016	8/9/2016	8/9/2016	8/9/2016	8/9/2016
Sample Depth:				(19.5-20) ft BGS	(1.5-2) ft BGS	(5-5.5) ft BGS	(10-10.5) ft BGS	(15-15.5) ft BGS	(19.5-20) ft BGS	(1.5-2) ft BGS	(5-5.5) ft BGS	(10-10.5) ft BGS	(15-15.5) ft BGS	(19.5-20) ft BGS
Matrix		a	b	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil
	Units													
PCBs														
Aroclor-1016 (PCB-1016)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1221 (PCB-1221)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1232 (PCB-1232)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1242 (PCB-1242)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1248 (PCB-1248)	mg/kg	1	100	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
Aroclor-1254 (PCB-1254)	mg/kg	1	100	BDL	**1.4[a]**	**2.9[a]**	BDL	BDL	BDL	0.34	BDL	BDL	BDL	BDL
Aroclor-1260 (PCB-1260)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Total PCBs	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--

Area				EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST
Sample Location:				GP-33	GP-33	GP-33	GP-33	GP-33	GP-34	GP-34	GP-34	GP-34	GP-34	GP-34
Sample Date:				8/9/2016	8/9/2016	8/9/2016	8/9/2016	8/9/2016	8/9/2016	8/9/2016	8/9/2016	8/9/2016	8/9/2016	8/9/2016
Sample Depth:				(1-1.5) ft BGS	(5-5.5) ft BGS	(10-10.5) ft BGS	(15-15.5) ft BGS	(19.5-20) ft BGS	(1.25-1.75) ft BGS	(5-5.5) ft BGS	(7.5-8) ft BGS	(10-10.5) ft BGS	(15-15.5) ft BGS	(19.5-20) ft BGS
Matrix		a	b	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil
	Units													
PCBs														
Aroclor-1016 (PCB-1016)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1221 (PCB-1221)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1232 (PCB-1232)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1242 (PCB-1242)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1248 (PCB-1248)	mg/kg	1	100	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
Aroclor-1254 (PCB-1254)	mg/kg	1	100	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
Aroclor-1260 (PCB-1260)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Total PCBs	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--

Area				EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST
Sample Location:				GP-35	GP-35	GP-35	GP-35	GP-35	GP-36	GP-36	GP-36	GP-36	GP-37	GP-37
Sample Date:				8/10/2016	8/10/2016	8/10/2016	8/10/2016	8/10/2016	8/9/2016	8/9/2016	8/9/2016	8/9/2016	8/9/2016	8/9/2016
Sample Depth:				(1.25-1.75) ft BGS	(5-5.5) ft BGS	(10-10.5) ft BGS	(15-15.5) ft BGS	(19.5-20) ft BGS	(1-1.5) ft BGS	(5-5.5) ft BGS	(10-10.5) ft BGS	(15-15.5) ft BGS	(0.5-1) ft BGS	(5-5.5) ft BGS
Matrix		a	b	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil
	Units													
PCBs														
Aroclor-1016 (PCB-1016)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1221 (PCB-1221)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1232 (PCB-1232)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1242 (PCB-1242)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1248 (PCB-1248)	mg/kg	1	100	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
Aroclor-1254 (PCB-1254)	mg/kg	1	100	0.45	BDL	BDL	BDL	BDL	**370[ab]**	**12[a]**	**4.1[a]**	**35[a]**	**130[ab]**	**7.3[a]**
Aroclor-1260 (PCB-1260)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Total PCBs	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--

Table 2

Summary of Soil Analytical Results
Former Douglas Michigan Facility
200 Blue Star Highway
Douglas, Michigan 49406

Area				EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST
Sample Location:				GP-37	GP-37	GP-38	GP-38	GP-38	GP-38	GP-38	GP-39	GP-39	GP-39	GP-39
Sample Date:				8/9/2016	8/9/2016	8/8/2016	8/8/2016	8/8/2016	8/8/2016	8/8/2016	8/8/2016	8/8/2016	8/8/2016	8/8/2016
Sample Depth:				(10-10.5) ft BGS	(15-15.5) ft BGS	(1-1.5) ft BGS	(5-5.5) ft BGS	(10-10.5) ft BGS	(15-15.5) ft BGS	(19.5-20) ft BGS	(1-1.5) ft BGS	(5-5.5) ft BGS	(10-10.5) ft BGS	(15-15.25) ft BGS
Matrix		a	b	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil
	Units													
PCBs														
Aroclor-1016 (PCB-1016)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1221 (PCB-1221)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1232 (PCB-1232)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1242 (PCB-1242)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1248 (PCB-1248)	mg/kg	1	100	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
Aroclor-1254 (PCB-1254)	mg/kg	1	100	**4.5[a]**	**980[ab]**	0.73	BDL	BDL	BDL	BDL	**2[a]**	BDL	BDL	BDL
Aroclor-1260 (PCB-1260)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Total PCBs	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--

Area				EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST
Sample Location:				GP-39	GP-40	GP-40	GP-40	GP-40	GP-40	GP-41	GP-41	GP-41	GP-41	GP-42
Sample Date:				8/8/2016	8/8/2016	8/9/2016	8/9/2016	8/9/2016	8/9/2016	8/8/2016	8/8/2016	8/8/2016	8/8/2016	8/9/2016
Sample Depth:				(19.5-20) ft BGS	(1-1.5) ft BGS	(0.75-1.25) ft BGS	(5-5.5) ft BGS	(10-10.5) ft BGS	(11.5-12) ft BGS	(1-1.5) ft BGS	(5-5.5) ft BGS	(10-10.5) ft BGS	(11.75-12.25) ft BGS	(1.5-2) ft BGS
Matrix		a	b	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil
	Units													
PCBs														
Aroclor-1016 (PCB-1016)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1221 (PCB-1221)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1232 (PCB-1232)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1242 (PCB-1242)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1248 (PCB-1248)	mg/kg	1	100	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	3.9 U	24 U	BDL
Aroclor-1254 (PCB-1254)	mg/kg	1	100	BDL	**120[ab]**	**150[ab]**	**32[a]**	0.22	**26000[ab]**	**2100[ab]**	**1.3[a]**	**23[a]**	**48[a]**	**2.5[a]**
Aroclor-1260 (PCB-1260)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Total PCBs	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--

Area				EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST
Sample Location:				GP-42	GP-42	GP-42	GP-42	GP-43	GP-43	GP-43	GP-43	GP-44	GP-44	GP-44
Sample Date:				8/9/2016	8/9/2016	8/9/2016	8/9/2016	8/8/2016	8/8/2016	8/8/2016	8/8/2016	8/8/2016	8/8/2016	8/8/2016
Sample Depth:				(5-5.5) ft BGS	(10-10.5) ft BGS	(15-15.5) ft BGS	(19.5-20) ft BGS	(1-1.5) ft BGS	(5-5.5) ft BGS	(10-10.5) ft BGS	(14.5-15) ft BGS	(1-1.5) ft BGS	(5-5.5) ft BGS	(10-10.5) ft BGS
Matrix		a	b	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil
	Units													
PCBs														
Aroclor-1016 (PCB-1016)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1221 (PCB-1221)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1232 (PCB-1232)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1242 (PCB-1242)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1248 (PCB-1248)	mg/kg	1	100	BDL	BDL	BDL	BDL	BDL	3.8 U	BDL	460 U	BDL	BDL	BDL
Aroclor-1254 (PCB-1254)	mg/kg	1	100	**17[a]**	BDL	BDL	BDL	**53[a]**	**31[a]**	**3.3[a]**	**3100[ab]**	0.19	0.79	BDL
Aroclor-1260 (PCB-1260)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Total PCBs	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--

Table 2

Summary of Soil Analytical Results
Former Douglas Michigan Facility
200 Blue Star Highway
Douglas, Michigan 49406

Area				EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST
Sample Location:				GP-44	GP-44	GP-45	GP-45	GP-45	GP-45	GP-46	GP-46	GP-46	GP-46	GP-46
Sample Date:				8/8/2016	8/8/2016	8/8/2016	8/8/2016	8/8/2016	8/8/2016	8/8/2016	8/8/2016	8/8/2016	8/8/2016	8/8/2016
Sample Depth:				(15-15.5) ft BGS	(19.5-20) ft BGS	(1-1.5) ft BGS	(5-5.5) ft BGS	(10-10.5) ft BGS	(14.5-15) ft BGS	(1-1.5) ft BGS	(5-5.5) ft BGS	(10-10.5) ft BGS	(15-15.5) ft BGS	(19.5-20) ft BGS
Matrix		a	b	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil
	Units													
PCBs														
Aroclor-1016 (PCB-1016)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1221 (PCB-1221)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1232 (PCB-1232)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1242 (PCB-1242)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1248 (PCB-1248)	mg/kg	1	100	BDL	BDL	BDL	1.9 U	BDL	8.7 U	BDL	BDL	BDL	BDL	BDL
Aroclor-1254 (PCB-1254)	mg/kg	1	100	BDL	BDL	**28[a]**	**4.8[a]**	BDL	**71[a]**	**16[a]**	BDL	BDL	BDL	BDL
Aroclor-1260 (PCB-1260)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Total PCBs	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--

Area				EAST	EAST	EAST	EAST	WEST	WEST	WEST	WEST	WEST	WEST	WEST
Sample Location:				GP-47	GP-47	GP-47	GP-47	GP-48	GP-48	GP-48	GP-48	GP-48	GP-49	GP-49
Sample Date:				8/8/2016	8/8/2016	8/8/2016	8/8/2016	8/8/2016	8/8/2016	8/8/2016	8/8/2016	8/8/2016	8/8/2016	8/8/2016
Sample Depth:				(1-1.5) ft BGS	(5-5.5) ft BGS	(10-10.5) ft BGS	(12-12.5) ft BGS	(0.5-1) ft BGS	(5-5.5) ft BGS	(10-10.5) ft BGS	(15-15.5) ft BGS	(19.5-20) ft BGS	(2-2.5) ft BGS	(5-5.5) ft BGS
Matrix		a	b	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil
	Units													
PCBs														
Aroclor-1016 (PCB-1016)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1221 (PCB-1221)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1232 (PCB-1232)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1242 (PCB-1242)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1248 (PCB-1248)	mg/kg	1	100	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
Aroclor-1254 (PCB-1254)	mg/kg	1	100	**9.9[a]**	0.27	BDL	**16[a]**	BDL	BDL	BDL	BDL	BDL	BDL	BDL
Aroclor-1260 (PCB-1260)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Total PCBs	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--

Area				WEST	WEST	WEST	WEST	WEST	WEST	WEST	WEST	EAST	EAST	EAST
Sample Location:				GP-49	GP-49	GP-49	GP-50	GP-50	GP-50	GP-50	GP-50	GP-58	GP-58	GP-58
Sample Date:				8/8/2016	8/8/2016	8/8/2016	8/8/2016	8/8/2016	8/8/2016	8/8/2016	8/8/2016	8/9/2016	8/9/2016	8/9/2016
Sample Depth:				(10-10.5) ft BGS	(15-15.5) ft BGS	(19.5-20) ft BGS	(0.75-1.25) ft BGS	(5-5.5) ft BGS	(10-10.5) ft BGS	(15-15.5) ft BGS	(19.5-20) ft BGS	(0.25-0.75) ft BGS	(5-5.5) ft BGS	(10-10.5) ft BGS
Matrix		a	b	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil
	Units													
PCBs														
Aroclor-1016 (PCB-1016)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1221 (PCB-1221)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1232 (PCB-1232)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1242 (PCB-1242)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1248 (PCB-1248)	mg/kg	1	100	BDL	BDL	BDL	2 U	BDL	BDL	BDL	BDL	BDL	BDL	BDL
Aroclor-1254 (PCB-1254)	mg/kg	1	100	BDL	BDL	BDL	**4.6[a]**	BDL	BDL	BDL	BDL	BDL	BDL	BDL
Aroclor-1260 (PCB-1260)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Total PCBs	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--

Table 2

Summary of Soil Analytical Results
Former Douglas Michigan Facility
200 Blue Star Highway
Douglas, Michigan 49406

Area				EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST
Sample Location:				GP-58	GP-58	GP-59	GP-59	GP-59	GP-59	GP-59	GP-60	GP-60	GP-60	GP-60
Sample Date:				8/9/2016	8/9/2016	8/9/2016	8/9/2016	8/9/2016	8/9/2016	8/9/2016	8/9/2016	8/9/2016	8/9/2016	8/9/2016
Sample Depth:				(15-15.5) ft BGS	(19.5-20) ft BGS	(0.25-0.75) ft BGS	(5-5.5) ft BGS	(10-10.5) ft BGS	(15-15.5) ft BGS	(19.5-20) ft BGS	(0.25-0.75) ft BGS	(5-5.5) ft BGS	(10-10.5) ft BGS	(15-15.5) ft BGS
Matrix		a	b	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil
	Units													
PCBs														
Aroclor-1016 (PCB-1016)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1221 (PCB-1221)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1232 (PCB-1232)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1242 (PCB-1242)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1248 (PCB-1248)	mg/kg	1	100	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
Aroclor-1254 (PCB-1254)	mg/kg	1	100	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
Aroclor-1260 (PCB-1260)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Total PCBs	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--

Area				EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST
Sample Location:				GP-60	GP-61	GP-61	GP-61	GP-61	GP-61	GP-62	GP-62	GP-62	GP-62	GP-62
Sample Date:				8/9/2016	8/10/2016	8/10/2016	8/10/2016	8/10/2016	8/10/2016	8/10/2016	8/10/2016	8/10/2016	8/10/2016	8/10/2016
Sample Depth:				(19.5-20) ft BGS	(0.25-0.75) ft BGS	(5-5.5) ft BGS	(10-10.5) ft BGS	(15-15.5) ft BGS	(19.5-20) ft BGS	(1-1.5) ft BGS	(5-5.5) ft BGS	(10-10.5) ft BGS	(15-15.5) ft BGS	(19.5-20) ft BGS
Matrix		a	b	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil
	Units													
PCBs														
Aroclor-1016 (PCB-1016)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1221 (PCB-1221)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1232 (PCB-1232)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1242 (PCB-1242)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1248 (PCB-1248)	mg/kg	1	100	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
Aroclor-1254 (PCB-1254)	mg/kg	1	100	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
Aroclor-1260 (PCB-1260)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Total PCBs	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--

Area				EAST	EAST	EAST	EAST	EAST	WEST	WEST	WEST	WEST	WEST	EAST
Sample Location:				GP-63	GP-63	GP-63	GP-63	GP-63	GP-64	GP-64	GP-64	GP-64	GP-64	GP-65
Sample Date:				8/10/2016	8/10/2016	8/10/2016	8/10/2016	8/10/2016	8/8/2016	8/8/2016	8/8/2016	8/8/2016	8/8/2016	8/16/2016
Sample Depth:				(1-1.5) ft BGS	(5-5.5) ft BGS	(10-10.5) ft BGS	(15-15.5) ft BGS	(19.5-20) ft BGS	(2-2.5) ft BGS	(5-5.5) ft BGS	(10-10.5) ft BGS	(15-15.5) ft BGS	(19.5-20) ft BGS	(1-1.5) ft BGS
Matrix		a	b	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil
	Units													
PCBs														
Aroclor-1016 (PCB-1016)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1221 (PCB-1221)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1232 (PCB-1232)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1242 (PCB-1242)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1248 (PCB-1248)	mg/kg	1	100	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
Aroclor-1254 (PCB-1254)	mg/kg	1	100	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
Aroclor-1260 (PCB-1260)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Total PCBs	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--

Table 2

Summary of Soil Analytical Results
Former Douglas Michigan Facility
200 Blue Star Highway
Douglas, Michigan 49406

Area				EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST
Sample Location:				GP-65	GP-65	GP-65	GP-65	GP-66	GP-66	GP-66	GP-66	GP-66	GP-67	GP-67
Sample Date:				8/16/2016	8/16/2016	8/16/2016	8/16/2016	8/16/2016	8/16/2016	8/16/2016	8/16/2016	8/16/2016	8/16/2016	8/16/2016
Sample Depth:				(5-5.5) ft BGS	(10-10.5) ft BGS	(15-15.5) ft BGS	(19.5-20) ft BGS	(1-1.5) ft BGS	(5-5.5) ft BGS	(10-10.5) ft BGS	(16-16.5) ft BGS	(19.5-20) ft BGS	(1-1.5) ft BGS	(5-5.5) ft BGS
Matrix		a	b	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil
	Units													
PCBs														
Aroclor-1016 (PCB-1016)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1221 (PCB-1221)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1232 (PCB-1232)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1242 (PCB-1242)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1248 (PCB-1248)	mg/kg	1	100	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
Aroclor-1254 (PCB-1254)	mg/kg	1	100	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
Aroclor-1260 (PCB-1260)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Total PCBs	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--

Area				EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST
Sample Location:				GP-67	GP-67	GP-67	GP-68	GP-68	GP-68	GP-68	GP-68	GP-69	GP-69	GP-69
Sample Date:				8/16/2016	8/16/2016	8/16/2016	8/17/2016	8/17/2016	8/17/2016	8/17/2016	8/17/2016	8/17/2016	8/17/2016	8/17/2016
Sample Depth:				(10-10.5) ft BGS	(15-15.5) ft BGS	(19.5-20) ft BGS	(1-1.5) ft BGS	(5-5.5) ft BGS	(10-10.5) ft BGS	(15-15.5) ft BGS	(19.5-20) ft BGS	(0.8-1.3) ft BGS	(5-5.5) ft BGS	(10-10.5) ft BGS
Matrix		a	b	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil
	Units													
PCBs														
Aroclor-1016 (PCB-1016)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1221 (PCB-1221)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1232 (PCB-1232)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1242 (PCB-1242)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1248 (PCB-1248)	mg/kg	1	100	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	5.4[a]
Aroclor-1254 (PCB-1254)	mg/kg	1	100	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	230[ab]	3.1[a]	BDL
Aroclor-1260 (PCB-1260)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Total PCBs	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--

Area				EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST
Sample Location:				GP-69	GP-70	GP-70	GP-70	GP-70	GP-70	GP-71	GP-71	GP-71	GP-71	GP-71
Sample Date:				8/17/2016	8/16/2016	8/16/2016	8/16/2016	8/16/2016	8/16/2016	8/16/2016	8/16/2016	8/16/2016	8/16/2016	8/16/2016
Sample Depth:				(11.5-12) ft BGS	(1.75-2.25) ft BGS	(5-5.5) ft BGS	(10-10.5) ft BGS	(15-15.5) ft BGS	(19.5-20) ft BGS	(1-1.5) ft BGS	(5-5.5) ft BGS	(10-10.5) ft BGS	(15-15.5) ft BGS	(19.5-20) ft BGS
Matrix		a	b	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil
	Units													
PCBs														
Aroclor-1016 (PCB-1016)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1221 (PCB-1221)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1232 (PCB-1232)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1242 (PCB-1242)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1248 (PCB-1248)	mg/kg	1	100	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
Aroclor-1254 (PCB-1254)	mg/kg	1	100	1500[ab]	BDL	BDL	BDL	BDL	BDL	0.29	BDL	BDL	BDL	BDL
Aroclor-1260 (PCB-1260)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Total PCBs	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--

Table 2

Summary of Soil Analytical Results
Former Douglas Michigan Facility
200 Blue Star Highway
Douglas, Michigan 49406

Area				EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST
Sample Location:				GP-72	GP-73	GP-73B	GP-73B	GP-73B	GP-73B	GP-74	GP-74	GP-74	GP-74	GP-74
Sample Date:				8/16/2016	8/16/2016	8/16/2016	8/16/2016	8/16/2016	8/16/2016	8/16/2016	8/16/2016	8/16/2016	8/16/2016	8/16/2016
Sample Depth:				(1-1.5) ft BGS	(1-1.5) ft BGS	(5-5.5) ft BGS	(10-10.5) ft BGS	(15-15.5) ft BGS	(19.5-20) ft BGS	(1.25-1.75) ft BGS	(5-5.5) ft BGS	(10-10.5) ft BGS	(15-15.5) ft BGS	(19.5-20) ft BGS
Matrix		a	b	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil
	Units													
PCBs														
Aroclor-1016 (PCB-1016)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1221 (PCB-1221)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1232 (PCB-1232)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1242 (PCB-1242)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1248 (PCB-1248)	mg/kg	1	100	BDL	BDL	0.21	BDL	BDL	BDL	BDL	BDL	BDL	0.24	BDL
Aroclor-1254 (PCB-1254)	mg/kg	1	100	BDL	**40[a]**	BDL	BDL	BDL	BDL	**83[a]**	BDL	BDL	BDL	BDL
Aroclor-1260 (PCB-1260)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Total PCBs	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--

Area				EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST
Sample Location:				GP-75	GP-75	GP-75	GP-75	GP-76	GP-76	GP-76	GP-76	GP-77	GP-77	GP-77
Sample Date:				8/16/2016	8/16/2016	8/16/2016	8/16/2016	8/16/2016	8/16/2016	8/16/2016	8/16/2016	8/17/2016	8/17/2016	8/17/2016
Sample Depth:				(1-1.5) ft BGS	(5-5.5) ft BGS	(10-10.5) ft BGS	(14.5-15) ft BGS	(0.8-1.3) ft BGS	(5-5.5) ft BGS	(10-10.5) ft BGS	(14.5-15) ft BGS	(0.9-1.4) ft BGS	(5-5.5) ft BGS	(10-10.5) ft BGS
Matrix		a	b	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil
	Units													
PCBs														
Aroclor-1016 (PCB-1016)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1221 (PCB-1221)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1232 (PCB-1232)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1242 (PCB-1242)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1248 (PCB-1248)	mg/kg	1	100	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
Aroclor-1254 (PCB-1254)	mg/kg	1	100	**26[a]**	**1.9[a]**	BDL	**4.5[a]**	**4.7[a]**	BDL	0.62	**2.8[a]**	BDL	BDL	**4.1[a]**
Aroclor-1260 (PCB-1260)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Total PCBs	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--

Area				EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST
Sample Location:				GP-77	GP-77	GP-78	GP-78	GP-78	GP-78	GP-78	GP-79	GP-79	GP-79	GP-79
Sample Date:				8/17/2016	8/17/2016	8/17/2016	8/17/2016	8/17/2016	8/17/2016	8/17/2016	8/17/2016	8/17/2016	8/17/2016	8/17/2016
Sample Depth:				(15-15.5) ft BGS	(19.5-20) ft BGS	(1-1.5) ft BGS	(5-5.5) ft BGS	(10-10.5) ft BGS	(15-15.5) ft BGS	(19.5-20) ft BGS	(1-1.5) ft BGS	(5-5.5) ft BGS	(10-10.5) ft BGS	(15-15.5) ft BGS
Matrix		a	b	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil
	Units													
PCBs														
Aroclor-1016 (PCB-1016)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1221 (PCB-1221)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1232 (PCB-1232)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1242 (PCB-1242)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1248 (PCB-1248)	mg/kg	1	100	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
Aroclor-1254 (PCB-1254)	mg/kg	1	100	BDL	BDL	0.96	0.36	BDL	BDL	BDL	0.68	BDL	BDL	BDL
Aroclor-1260 (PCB-1260)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Total PCBs	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--

Table 2

Summary of Soil Analytical Results
Former Douglas Michigan Facility
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Area				EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST
Sample Location:				GP-79	GP-80	GP-80	GP-80	GP-80	GP-80	GP-81	GP-81	GP-81	GP-81	GP-81
Sample Date:				8/17/2016	8/17/2016	8/17/2016	8/17/2016	8/17/2016	8/17/2016	8/17/2016	8/17/2016	8/17/2016	8/17/2016	8/17/2016
Sample Depth:				(19.5-20) ft BGS	(0.8-1.3) ft BGS	(5-5.5) ft BGS	(10-10.5) ft BGS	(15-15.5) ft BGS	(19.5-20) ft BGS	(0.9-1.4) ft BGS	(5-5.5) ft BGS	(10-10.5) ft BGS	(15-15.5) ft BGS	(19.5-20) ft BGS
Matrix		a	b	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil
	Units													
PCBs														
Aroclor-1016 (PCB-1016)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1221 (PCB-1221)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1232 (PCB-1232)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1242 (PCB-1242)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1248 (PCB-1248)	mg/kg	1	100	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
Aroclor-1254 (PCB-1254)	mg/kg	1	100	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
Aroclor-1260 (PCB-1260)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Total PCBs	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--

Area				EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	WEST
Sample Location:				GP-82	GP-82	GP-82	GP-82	GP-82	GP-83	GP-83	GP-83	GP-83	GP-83	GP-84
Sample Date:				8/17/2016	8/17/2016	8/17/2016	8/17/2016	8/17/2016	8/16/2016	8/16/2016	8/17/2016	8/17/2016	8/17/2016	11/28/2016
Sample Depth:				(1-1.5) ft BGS	(5-5.5) ft BGS	(10-10.5) ft BGS	(15-15.5) ft BGS	(19.5-20) ft BGS	(5-5.5) ft BGS	(10-10.5) ft BGS	(0.9-1.4) ft BGS	(15-15.5) ft BGS	(19.5-20) ft BGS	(0.6-1.1) ft BGS
Matrix		a	b	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil
	Units													
PCBs														
Aroclor-1016 (PCB-1016)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1221 (PCB-1221)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1232 (PCB-1232)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1242 (PCB-1242)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1248 (PCB-1248)	mg/kg	1	100	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
Aroclor-1254 (PCB-1254)	mg/kg	1	100	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	0.096 J
Aroclor-1260 (PCB-1260)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Total PCBs	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--

Area				WEST	WEST	WEST	WEST	WEST	WEST	WEST	WEST	WEST	WEST	WEST
Sample Location:				GP-84	GP-84B	GP-84B	GP-85	GP-85	GP-84	GP-84	GP-84B	GP-84B	GP-85	GP-85
Sample Date:				11/28/2016	11/29/2016	11/29/2016	11/28/2016	11/29/2016	11/28/2016	11/28/2016	11/29/2016	11/29/2016	11/28/2016	11/29/2016
Sample Depth:				(5-5.5) ft BGS	(10-10.5) ft BGS	(15-15.5) ft BGS	(0.85-1.35) ft BGS	(5-5.5) ft BGS	(0.6-1.1) ft BGS	(5-5.5) ft BGS	(10-10.5) ft BGS	(15-15.5) ft BGS	(0.85-1.35) ft BGS	(5-5.5) ft BGS
Matrix		a	b	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil
	Units													
PCBs														
Aroclor-1016 (PCB-1016)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1221 (PCB-1221)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1232 (PCB-1232)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1242 (PCB-1242)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1248 (PCB-1248)	mg/kg	1	100	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
Aroclor-1254 (PCB-1254)	mg/kg	1	100	BDL	BDL	BDL	BDL	BDL	0.096 J	BDL	BDL	BDL	BDL	BDL
Aroclor-1260 (PCB-1260)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Total PCBs	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--

Table 2

Summary of Soil Analytical Results
Former Douglas Michigan Facility
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Area				WEST	WEST	WEST	WEST	WEST	WEST	WEST	WEST	WEST	WEST	WEST
Sample Location:				GP-85	GP-85	GP-86	GP-86	GP-86B	GP-86B	GP-87	GP-87	GP-87	GP-87	GP-88
Sample Date:				11/29/2016	11/29/2016	11/29/2016	11/29/2016	11/29/2016	11/29/2016	11/29/2016	11/29/2016	11/29/2016	11/29/2016	11/29/2016
Sample Depth:				(10-10.5) ft BGS	(15-15.5) ft BGS	(0.6-1.1) ft BGS	(5-5.5) ft BGS	(10-10.5) ft BGS	(15-15.5) ft BGS	(0.75-1.25) ft BGS	(5-5.5) ft BGS	(10-10.5) ft BGS	(15-15.5) ft BGS	(0.8-1.3) ft BGS
Matrix		a	b	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil
	Units													
PCBs														
Aroclor-1016 (PCB-1016)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1221 (PCB-1221)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1232 (PCB-1232)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1242 (PCB-1242)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1248 (PCB-1248)	mg/kg	1	100	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
Aroclor-1254 (PCB-1254)	mg/kg	1	100	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
Aroclor-1260 (PCB-1260)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Total PCBs	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--

Area				WEST	WEST	WEST	WEST	WEST	WEST	WEST	WEST	WEST	EAST	EAST
Sample Location:				GP-88	GP-88	GP-88	GP-88	GP-89	GP-89	GP-89	GP-89	GP-89	GP-90	GP-90
Sample Date:				11/29/2016	11/29/2016	11/29/2016	11/29/2016	11/29/2016	11/29/2016	11/29/2016	11/29/2016	11/29/2016	11/29/2016	11/29/2016
Sample Depth:				(5-5.5) ft BGS	(10-10.5) ft BGS	(15-15.5) ft BGS	(19.5-20) ft BGS	(0.7-1.2) ft BGS	(5-5.5) ft BGS	(10-10.5) ft BGS	(15-15.5) ft BGS	(19.5-20) ft BGS	(0.8-1.3) ft BGS	(12-12.5) ft BGS
Matrix		a	b	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil
	Units													
PCBs														
Aroclor-1016 (PCB-1016)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1221 (PCB-1221)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1232 (PCB-1232)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1242 (PCB-1242)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1248 (PCB-1248)	mg/kg	1	100	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
Aroclor-1254 (PCB-1254)	mg/kg	1	100	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	**8.6[a]**	**20[a]**
Aroclor-1260 (PCB-1260)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Total PCBs	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--

Area				EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST
Sample Location:				GP-91	GP-92	GP-92	GP-92	GP-92	GP-92	GP-93	GP-93	GP-93	GP-94	GP-94
Sample Date:				11/29/2016	11/29/2016	11/29/2016	11/29/2016	11/29/2016	11/29/2016	11/29/2016	11/29/2016	11/29/2016	11/29/2016	11/29/2016
Sample Depth:				(3) ft BGS	(0.95-1.45) ft BGS	(5-5.5) ft BGS	(10-10.5) ft BGS	(15-15.5) ft BGS	(19.5-20) ft BGS	(2.5-3) ft BGS	(5-5.5) ft BGS	(10-10.5) ft BGS	(0.8-1.3) ft BGS	(5-5.5) ft BGS
Matrix		a	b	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil
	Units													
PCBs														
Aroclor-1016 (PCB-1016)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1221 (PCB-1221)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1232 (PCB-1232)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1242 (PCB-1242)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1248 (PCB-1248)	mg/kg	1	100	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
Aroclor-1254 (PCB-1254)	mg/kg	1	100	0.63	BDL	BDL	BDL	BDL	BDL	**22[a]**	BDL	0.59	**4[a]**	0.29
Aroclor-1260 (PCB-1260)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Total PCBs	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--

Table 2

Summary of Soil Analytical Results
Former Douglas Michigan Facility
200 Blue Star Highway
Douglas, Michigan 49406

Area				EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST
Sample Location:				GP-94	GP-94	GP-95	GP-95	GP-95	GP-95	GP-95	GP-96	GP-97	GP-98	GP-99
Sample Date:				11/29/2016	11/29/2016	11/29/2016	11/29/2016	11/29/2016	11/29/2016	11/29/2016	11/29/2016	11/29/2016	11/30/2016	11/29/2016
Sample Depth:				(10-10.5) ft BGS	(14.5-15) ft BGS	(0.9-1.4) ft BGS	(5-5.5) ft BGS	(10-10.5) ft BGS	(15-15.5) ft BGS	(19.5-20) ft BGS	(14.5-15) ft BGS	(12-12.5) ft BGS	(11.5-12) ft BGS	(0.7-1.2) ft BGS
Matrix		a	b	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil
	Units													
PCBs														
Aroclor-1016 (PCB-1016)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1221 (PCB-1221)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1232 (PCB-1232)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1242 (PCB-1242)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1248 (PCB-1248)	mg/kg	1	100	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
Aroclor-1254 (PCB-1254)	mg/kg	1	100	BDL	10[a]	0.61	BDL	BDL	BDL	BDL	6.3[a]	3200[ab]	2800[ab]	0.35
Aroclor-1260 (PCB-1260)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Total PCBs	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--

Area				EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST
Sample Location:				GP-99	GP-99	GP-99	GP-99	GP-107	GP-107	GP-107	GP-108	GP-108	GP-108	GP-109
Sample Date:				11/29/2016	11/30/2016	11/30/2016	11/30/2016	12/1/2016	12/1/2016	12/1/2016	12/1/2016	12/1/2016	12/1/2016	12/1/2016
Sample Depth:				(5-5.5) ft BGS	(10-10.5) ft BGS	(15-15.5) ft BGS	(19.5-20) ft BGS	(0.6-1.1) ft BGS	(5-5.5) ft BGS	(8-8.5) ft BGS	(0.6-1.1) ft BGS	(5-5.5) ft BGS	(8-8.5) ft BGS	(0.5-1) ft BGS
Matrix		a	b	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil
	Units													
PCBs														
Aroclor-1016 (PCB-1016)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1221 (PCB-1221)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1232 (PCB-1232)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1242 (PCB-1242)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1248 (PCB-1248)	mg/kg	1	100	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
Aroclor-1254 (PCB-1254)	mg/kg	1	100	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	0.061 J
Aroclor-1260 (PCB-1260)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Total PCBs	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--

Area				EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST
Sample Location:				GP-109	GP-109	GP-111	GP-112	GP-112	GP-112	GP-112	GP-114	GP-114	GP-114	GP-114
Sample Date:				12/1/2016	12/1/2016	1/20/2017	1/20/2017	1/20/2017	1/20/2017	1/20/2017	1/20/2017	1/20/2017	1/20/2017	1/20/2017
Sample Depth:				(5-5.5) ft BGS	(8-8.5) ft BGS	-	-	(5) ft BGS	(10) ft BGS	(15) ft BGS	-	(5) ft BGS	(10) ft BGS	(15) ft BGS
Matrix		a	b	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil
	Units													
PCBs														
Aroclor-1016 (PCB-1016)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1221 (PCB-1221)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1232 (PCB-1232)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1242 (PCB-1242)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1248 (PCB-1248)	mg/kg	1	100	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
Aroclor-1254 (PCB-1254)	mg/kg	1	100	BDL	BDL	BDL	BDL	BDL	BDL	BDL	0.45	BDL	BDL	BDL
Aroclor-1260 (PCB-1260)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--
Total PCBs	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--

Notes:
1. ERM data based on ERM's 2017 Draft PCB Cleanup Plan and Application for Risk-Based Cleanup and Disposal Approval. No laboratory analytical reports were provided by ERM.
2. GHD laboratory analytical reports are provided in Appendix C.
U - Not detected at the associated reporting limit.
J - Estimated concentration.

Table 3

Summary of Concrete Analytical Results
Former Douglas Michigan Facility
200 Blue Star Highway
Douglas, Michigan 49406

Area				EAST	EAST	EAST	EAST	EAST	WEST	WEST	WEST	WEST	WEST	EAST	EAST
Sample Location:				CS-001	CS-002	CS-003	CS-004	CS-005	CS-006	CS-007	CS-008	CS-009	CS-010	East Wall	North Wall
Sample Date:				6/25/2018	6/25/2018	6/25/2018	6/25/2018	6/25/2018	6/25/2018	6/25/2018	6/25/2018	6/25/2018	6/25/2018	6/25/2018	6/25/2018
Sample Depth:				-	-	-	-	-	-	-	-	-	-	-	-
Sample Type:		a	b	Concrete	Concrete	Concrete	Concrete	Concrete	Concrete	Concrete	Concrete	Concrete	Concrete	Concrete	Concrete
PCBs	**Units**														
Aroclor-1016 (PCB-1016)	mg/kg	1	100	0.12 U	0.11 U	0.11 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.099 U	0.098 U	0.5 U
Aroclor-1221 (PCB-1221)	mg/kg	1	100	0.12 U	0.11 U	0.11 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.099 U	0.098 U	0.5 U
Aroclor-1232 (PCB-1232)	mg/kg	1	100	0.12 U	0.11 U	0.11 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.099 U	0.098 U	0.5 U
Aroclor-1242 (PCB-1242)	mg/kg	1	100	0.12 U	0.11 U	0.11 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.099 U	0.098 U	0.5 U
Aroclor-1248 (PCB-1248)	mg/kg	1	100	0.12 U	0.11 U	0.11 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.099 U	0.098 U	0.5 U
Aroclor-1254 (PCB-1254)	mg/kg	1	100	0.12 U	0.11 U	0.11 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.099 U	**1.1[a]**	**4.1[a]**
Aroclor-1260 (PCB-1260)	mg/kg	1	100	0.12 U	0.11 U	0.11 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.099 U	0.098 U	0.5 U
Total PCBs	mg/kg	1	100	ND	ND	ND	ND	ND	ND	ND	ND	ND	0	**1.1[a]**	**4.1[a]**

Area				EAST	EAST	WEST	WEST	WEST	EAST	EAST	EAST	EAST	EAST	WEST	WEST
Sample Location:				North Wall (Dup)	West Wall	East Wall	North Wall	West Wall	GP-45	GP-46	GP-46	GP-47	GP-47	GP-48	GP-49
Sample Date:				6/25/2018	6/25/2018	6/25/2018	6/25/2018	6/25/2018	8/11/2016	12/6/2016	12/6/2016	12/6/2016	12/6/2016	12/2/2016	12/2/2016
Sample Depth:				-	-	-	-	-	(0.6) ft BGS	-	(0.4) ft BGS	-	(0.4) ft BGS	-	-
Sample Type:		a	b	Concrete	Concrete	Concrete	Concrete	Concrete	Concrete	Concrete	Concrete	Concrete	Concrete	Concrete	Concrete
PCBs	**Units**														
Aroclor-1016 (PCB-1016)	mg/kg	1	100	0.5 U	0.099 U	0.099 U	0.098 U	0.098 U	--	--	--	--	--	--	--
Aroclor-1221 (PCB-1221)	mg/kg	1	100	0.5 U	0.099 U	0.099 U	0.098 U	0.098 U	--	--	--	--	--	--	--
Aroclor-1232 (PCB-1232)	mg/kg	1	100	0.5 U	0.099 U	0.099 U	0.098 U	0.098 U	--	--	--	--	--	--	--
Aroclor-1242 (PCB-1242)	mg/kg	1	100	0.5 U	0.099 U	0.099 U	0.098 U	0.098 U	--	--	--	--	--	--	--
Aroclor-1248 (PCB-1248)	mg/kg	1	100	0.5 U	0.099 U	0.099 U	0.098 U	0.098 U	BDL	BDL	BDL	BDL	BDL	BDL	BDL
Aroclor-1254 (PCB-1254)	mg/kg	1	100	**3.5[a]**	0.42	0.22	0.6	0.15	**7.7[a]**	0.1	**2.3[a]**	0.34	**3.4[a]**	**1.6[a]**	BDL
Aroclor-1260 (PCB-1260)	mg/kg	1	100	0.5 U	0.099 U	0.099 U	0.098 U	0.098 U	--	--	--	--	--	--	--
Total PCBs	mg/kg	1	100	**3.5[a]**	0.42	0.22	0.6	0.15	--	--	--	--	--	--	--

Area				WEST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	WEST	WEST	WEST	WEST
Sample Location:				GP-50	GP-51	GP-52	GP-53	GP-54	GP-55	GP-56	GP-57	GP-64	GP-84	GP-85	GP-86
Sample Date:				12/2/2016	8/10/2016	8/11/2016	8/10/2016	8/10/2016	8/10/2016	8/11/2016	8/11/2016	12/2/2016	12/2/2016	12/2/2016	12/2/2016
Sample Depth:				-	(0.6) ft BGS	(0.5) ft BGS	(0.4) ft BGS	(0.4) ft BGS	(0.5) ft BGS	(0.7) ft BGS	(0.55) ft BGS	-	-	-	-
Sample Type:		a	b	Concrete	Concrete	Concrete	Concrete	Concrete	Concrete	Concrete	Concrete	Concrete	Concrete	Concrete	Concrete
PCBs	**Units**														
Aroclor-1016 (PCB-1016)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1221 (PCB-1221)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1232 (PCB-1232)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1242 (PCB-1242)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1248 (PCB-1248)	mg/kg	1	100	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	**2.7[a]**	BDL	BDL	BDL
Aroclor-1254 (PCB-1254)	mg/kg	1	100	0.088 J	**5600[ab]**	**620[ab]**	**84[a]**	**73[a]**	**4100[ab]**	**290[ab]**	**520[ab]**	BDL	BDL	**4[a]**	BDL
Aroclor-1260 (PCB-1260)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--	--
Total PCBs	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--	--

Area				WEST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST
Sample Location:				GP-87	GP-93	GP-93	GP-94	GP-94	GP-110	GP-110	GP-111	GP-112	GP-112	GP-113	GP-114
Sample Date:				12/2/2016	12/6/2016	12/6/2016	12/6/2016	12/6/2016	12/6/2016	12/6/2016	12/6/2016	12/6/2016	12/6/2016	12/6/2016	12/6/2016
Sample Depth:				-	-	(0.4) ft BGS	-	(0.3) ft BGS	-	(0.4) ft BGS	-	-	(0.5) ft BGS	-	-
Sample Type:		a	b	Concrete	Concrete	Concrete	Concrete	Concrete	Concrete	Concrete	Concrete	Concrete	Concrete	Concrete	Concrete
PCBs	**Units**														
Aroclor-1016 (PCB-1016)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1221 (PCB-1221)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1232 (PCB-1232)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1242 (PCB-1242)	mg/kg	1	100	--	--	--	--	--	--	--	--	0.089 J	**3.3 P[a]**	BDL	BDL
Aroclor-1248 (PCB-1248)	mg/kg	1	100	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
Aroclor-1254 (PCB-1254)	mg/kg	1	100	**5.2[a]**	0.45	**3.6[a]**	0.24	**2.3[a]**	0.22	**18[a]**	0.086 J	0.91	**44[a]**	0.05 J	**3.8[a]**
Aroclor-1260 (PCB-1260)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--	--
Total PCBs	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--	--

Table 3

Summary of Concrete Analytical Results
Former Douglas Michigan Facility
200 Blue Star Highway
Douglas, Michigan 49406

Area				EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST
Sample Location:				GP-114	GP-115	GP-115	GP-116	GP-117	GP-117	GP-118	GP-118	GP-119	GP-120	GP-120	GP-121
Sample Date:				12/6/2016	12/6/2016	12/6/2016	12/6/2016	12/6/2016	12/6/2016	12/6/2016	12/6/2016	12/6/2016	12/6/2016	12/6/2016	12/6/2016
Sample Depth:				(0.4) ft BGS	-	(0.4) ft BGS	-	-	(0.5) ft BGS	-	(0.5) ft BGS	-	-	(0.4) ft BGS	-
Sample Type:		a	b	Concrete	Concrete	Concrete	Concrete	Concrete	Concrete	Concrete	Concrete	Concrete	Concrete	Concrete	Concrete
PCBs	**Units**														
Aroclor-1016 (PCB-1016)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1221 (PCB-1221)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1232 (PCB-1232)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1242 (PCB-1242)	mg/kg	1	100	BDL	BDL	BDL	BDL	BDL	--	--	--	--	--	--	--
Aroclor-1248 (PCB-1248)	mg/kg	1	100	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
Aroclor-1254 (PCB-1254)	mg/kg	1	100	**76[a]**	**4.1[a]**	**28[a]**	0.11	**4.8[a]**	**120[ab]**	0.29	**54[a]**	0.1 J	**4.6[a]**	**96[a]**	0.19
Aroclor-1260 (PCB-1260)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--	--
Total PCBs	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--	--

Area				EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST	EAST
Sample Location:				GP-121	GP-122	GP-123	GP-123	GP-124	GP-124	GP-125	GP-125	GP-126	GP-127	GP-127	GP-128
Sample Date:				12/6/2016	12/6/2016	12/6/2016	12/6/2016	12/6/2016	12/6/2016	12/6/2016	12/6/2016	12/6/2016	12/6/2016	12/6/2016	12/6/2016
Sample Depth:				(0.4) ft BGS	-	-	(0.5) ft BGS	-	(0.5) ft BGS	-	(0.5) ft BGS	-	-	(0.5) ft BGS	-
Sample Type:		a	b	Concrete	Concrete	Concrete	Concrete	Concrete	Concrete	Concrete	Concrete	Concrete	Concrete	Concrete	Concrete
PCBs	**Units**														
Aroclor-1016 (PCB-1016)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1221 (PCB-1221)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1232 (PCB-1232)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1242 (PCB-1242)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--	--
Aroclor-1248 (PCB-1248)	mg/kg	1	100	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
Aroclor-1254 (PCB-1254)	mg/kg	1	100	**59[a]**	0.031 JP	**7[a]**	**310[ab]**	0.43	**34[a]**	0.61	**39[a]**	0.043 J	0.62	**97[a]**	0.091 J
Aroclor-1260 (PCB-1260)	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--	--
Total PCBs	mg/kg	1	100	--	--	--	--	--	--	--	--	--	--	--	--

Area				WEST	WEST	EAST	EAST	EAST
Sample Location:				GP-129	GP-130	GP-131	GP-132	GP-133
Sample Date:				1/23/2017	1/23/2017	1/23/2017	1/23/2017	1/23/2017
Sample Depth:				-	-	-	-	-
Sample Type:		a	b	Concrete	Concrete	Concrete	Concrete	Concrete
PCBs	**Units**							
Aroclor-1016 (PCB-1016)	mg/kg	1	100	--	--	--	--	--
Aroclor-1221 (PCB-1221)	mg/kg	1	100	--	--	--	--	--
Aroclor-1232 (PCB-1232)	mg/kg	1	100	--	--	--	--	--
Aroclor-1242 (PCB-1242)	mg/kg	1	100	--	--	--	--	--
Aroclor-1248 (PCB-1248)	mg/kg	1	100	BDL	BDL	BDL	BDL	BDL
Aroclor-1254 (PCB-1254)	mg/kg	1	100	**9.2[a]**	**3.6[a]**	BDL	BDL	BDL
Aroclor-1260 (PCB-1260)	mg/kg	1	100	--	--	--	--	--
Total PCBs	mg/kg	1	100	--	--	--	--	--

Notes:
1. ERM data based on ERM's 2017 Draft PCB Cleanup Plan and Application for Risk-Based Cleanup and Disposal Approval. No laboratory analytical reports were provided by ERM.
2. GHD laboratory analytical reports are provided in Appendix C.
U - Not detected at the associated reporting limit.
J - Estimated concentration.

Table 4

Summary of Other Sample Results (Groundwater, Soil Gas and Wipe Samples)
Former Douglas Michigan Facility
200 Blue Star Highway
Douglas, Michigan 49406

Wipe Sample Results		
Area		**EAST**
Sample Location:		**SW-EAST**
Sample Date:		**6/25/2018**
Matrix		**Wipe**
PCBs	**Units**	
Aroclor-1016 (PCB-1016)	ug/wipe	0.50 U
Aroclor-1221 (PCB-1221)	ug/wipe	0.50 U
Aroclor-1232 (PCB-1232)	ug/wipe	0.50 U
Aroclor-1242 (PCB-1242)	ug/wipe	0.50 U
Aroclor-1248 (PCB-1248)	ug/wipe	0.50 U
Aroclor-1254 (PCB-1254)	ug/wipe	0.38 J
Aroclor-1260 (PCB-1260)	ug/wipe	0.50 U
Total PCBs	ug/wipe	0.38 J

Groundwater Sample Results					
Area		**EAST**	**EAST**	**EAST**	**EAST**
Sample Location:		**GP-61**	**GP-107**	**GP-108**	**GP-109**
Sample Date:		**August 2016**	**Nov./Dec. 2016**	**Nov./Dec. 2016**	**Nov./Dec. 2016**
Matrix		**Groundwater**	**Groundwater**	**Groundwater**	**Groundwater**
PCBs	**Units**				
Total PCBs	ug/L	ND	ND	ND	ND

Soil Gas Sample Results				
Area		**EAST**	**EAST**	**EAST**
Sample Location:		**SV-1**	**SV-2**	**SV-3**
Sample Date:		**Nov./Dec. 2016**	**Nov./Dec. 2016**	**Nov./Dec. 2016**
Matrix		**Soil Gas**	**Soil Gas**	**Soil Gas**
PCBs	**Units**			
Total PCBs	ug/m3	ND	ND	ND

Notes:
1. ERM data based on ERM's 2017 Draft PCB Cleanup Plan and Application for Risk-Based Cleanup and Disposal Approval. Laboratory reports were not provided by ERM.
2. GHD laboratory analytical reports are provided in Appendix C.
U - Not detected at the associated reporting limit.
J - Estimated concentration.

Table 3

Groundwater Sampling Results Map
Groundwater Sampling Results Summary
(GHD, 3/2019)

Table 1

Sample Analysis Summary
Former Douglas Facility
Douglas, Michigan

Sample ID	Location Description	Collection Date (mm/dd/yy)	Sample Type	Matrix Code	QA/QC	Parent ID	Analysis
Rinsate-11152042-012319-JY-001	NA	1/23/2019	Groundwater	WG	Rinsate		VOCs, PCBs
TB-11152042-012319	NA	1/23/2019	Groundwater	WG	TB		VOCs
GW-11152042-012319-JY-001	MW-29	1/23/2019	Groundwater	WG			VOCs, PCBs
GW-11152042-012319-JY-002	MW-D-103	1/23/2019	Groundwater	WG			VOCs, PCBs
GW-11152042-012319-JY-003	MW304I	1/23/2019	Groundwater	WG			VOCs, PCBs
GW-11152042-012319-JY-004	MW-304I	1/23/2019	Groundwater	WG	Duplicate	- JY-003	VOCs, PCBs
GW-11152042-012319-JY-005	MW-304D	1/23/2019	Groundwater	WG			VOCs, PCBs
GW-11152042-012319-JY-006	MW-3-12	1/23/2019	Groundwater	WG	MS/MSD		VOCs, PCBs
GW-11152042-012419-JY-007	MW-303D	1/24/2019	Groundwater	WG			VOCs, PCBs

Notes:
QA/QC - Quality Assurance/Quality Control
Parent ID - Orignal sample from which a duplicate sample was collected from.
WG - Groundwater Sample
VOCs - Volatile organic compounds
PCBs - Polychlorinated biphenyls

Table 2

Summary of Groundwater Analytical Results
Former Douglas Facility
Douglas, Michigan

Sample Location:		MDEQ Generic Groundwater Cleanup Criteria: Residential and Nonresidential [1]					MW-29	MW-303D	MW-304D	MW-304I	MW-304I	MW-3-12	MW-D-103
Sample Identification:		Residential Drinking Water	Non-Residential Drinking Water	Groundwater Surface Water Interface	Residential Groundwater Volatilization to Indoor Air Inhalation	Non-Residential Groundwater Volatilization to Indoor Air Inhalation	1/23/2019	1/24/2019	1/23/2019	1/23/2019	1/23/2019 Duplicate	1/23/2019	1/23/2019
Sample Type:													
Sample Depth:													
		a	**b**	**c**	**d**	**e**							
Polychlorinated Biphenyls (PCBs)	**Units**												
Aroclor-1016 (PCB-1016)	ug/L	0.5	0.5	0.2	45	45	0.097 U	0.095 U	0.095 U	0.099 U	0.098 U	0.095 U	0.095 U
Aroclor-1221 (PCB-1221)	ug/L	0.5	0.5	0.2	45	45	0.097 U	0.095 U	0.095 U	0.099 U	0.098 U	0.095 U	0.095 U
Aroclor-1232 (PCB-1232)	ug/L	0.5	0.5	0.2	45	45	0.097 U	0.095 U	0.095 U	0.099 U	0.098 U	0.095 U	0.095 U
Aroclor-1242 (PCB-1242)	ug/L	0.5	0.5	0.2	45	45	0.097 U	0.095 U	0.095 U	0.099 U	0.098 U	0.095 U	0.095 U
Aroclor-1248 (PCB-1248)	ug/L	0.5	0.5	0.2	45	45	0.097 U	0.095 U	0.095 U	0.099 U	0.098 U	0.095 U	0.095 U
Aroclor-1254 (PCB-1254)	ug/L	0.5	0.5	0.2	45	45	0.097 U	0.095 U	0.095 U	0.099 U	0.098 U	0.095 U	0.095 U
Aroclor-1260 (PCB-1260)	ug/L	0.5	0.5	0.2	45	45	0.097 U	0.095 U	0.095 U	0.099 U	0.098 U	0.095 U	0.095 U
Total PCBs	ug/L	0.5	0.5	0.2	45	45	ND	ND	ND	ND	ND	ND	ND
Volatile Organic Compounds (VOCs)													
1,1,1-Trichloroethane	ug/L	200	200	89	660000	1300000	200 U	1.0 U	2.0 U	**250 J[abc]**	**290 J[abc]**	2.8 J	1000 U
1,1,2,2-Tetrachloroethane	ug/L	8.5	35	78	12000	77000	200 U	1.0 U	2.0 U	1000 U	1000 U	8.0 U	1000 U
1,1,2-Trichloroethane	ug/L	5	5	330	17000	110000	200 U	1.0 U	2.0 U	1000 U	1000 U	8.0 U	1000 U
1,1-Dichloroethane	ug/L	880	2500	740	1000000	2300000	200 U	1.0 U	2.0 U	1000 U	1000 U	8.0 U	1000 U
1,1-Dichloroethene	ug/L	7	7	130	200	1300	200 U	1.0 U	2.0 U	1000 U	1000 U	8.0 U	1000 U
1,2,4-Trichlorobenzene	ug/L	70	70	99	300000	300000	200 U	1.0 U	2.0 U	1000 U	1000 U	8.0 U	1000 U
1,2-Dibromo-3-chloropropane (DBCP)	ug/L	0.2	0.2	NA	220	1200	400 U	2.0 U	4.0 U	2000 U	2000 U	16 U	2000 U
1,2-Dibromoethane (Ethylene dibromide)	ug/L	0.05	0.05	5.7	2400	15000	200 U	1.0 U	2.0 U	1000 U	1000 U	8.0 U	1000 U
1,2-Dichlorobenzene	ug/L	600	600	13	160000	160000	200 U	1.0 U	2.0 U	1000 U	1000 U	8.0 U	1000 U
1,2-Dichloroethane	ug/L	5	5	360	9600	59000	200 U	1.0 U	2.0 U	1000 U	1000 U	8.0 U	1000 U
1,2-Dichloropropane	ug/L	5	5	230	16000	36000	200 U	1.0 U	2.0 U	1000 U	1000 U	8.0 U	1000 U
1,3-Dichlorobenzene	ug/L	6.6	19	28	18000	41000	200 U	1.0 U	2.0 U	1000 U	1000 U	8.0 U	1000 U
1,4-Dichlorobenzene	ug/L	75	75	17	16000	74000	200 U	1.0 U	2.0 U	1000 U	1000 U	8.0 U	1000 U
2-Butanone (Methyl ethyl ketone) (MEK)	ug/L	13000	38000	2200	240000000	240000000	2000 U	10 U	20 U	10000 U	10000 U	80 U	10000 U
2-Hexanone	ug/L	1000	2900	ID	4200000	8700000	2000 U	10 U	20 U	10000 U	10000 U	80 U	10000 U
4-Methyl-2-pentanone (Methyl isobutyl ketone) (MIBK)	ug/L	1800	5200	ID	20000000	20000000	2000 U	10 U	20 U	10000 U	10000 U	80 U	10000 U
Acetone	ug/L	730	2100	1700	1000000000	1000000000	2000 U	10 U	20 U	10000 U	10000 U	80 U	10000 U
Benzene	ug/L	5	5	200	5600	35000	200 U	1.0 U	2.0 U	1000 U	1000 U	8.0 U	1000 U
Bromodichloromethane	ug/L	80	80	ID	4800	37000	200 U	1.0 U	2.0 U	1000 U	1000 U	8.0 U	1000 U
Bromoform	ug/L	80	80	ID	470000	3100000	200 U	1.0 U	2.0 U	1000 U	1000 U	8.0 U	1000 U
Bromomethane (Methyl bromide)	ug/L	10	29	5	4000	9000	200 U	1.0 U	2.0 U	1000 U	1000 U	8.0 U	1000 U
Carbon disulfide	ug/L	800	2300	ID	250000	550000	200 U	1.0 U	2.0 U	1000 U	1000 U	8.0 U	1000 U
Carbon tetrachloride	ug/L	5	5	38	370	2400	200 U	1.0 U	2.0 U	1000 U	1000 U	8.0 U	1000 U
Chlorobenzene	ug/L	100	100	25	210000	470000	200 U	1.0 U	2.0 U	1000 U	1000 U	8.0 U	1000 U
Chloroethane	ug/L	430	1700	1100	5700000	5700000	200 U	1.0 U	2.0 U	1000 U	1000 U	8.0 U	1000 U
Chloroform (Trichloromethane)	ug/L	80	80	350	28000	180000	200 U	1.0 U	2.0 U	1000 U	1000 U	8.0 U	1000 U
Chloromethane (Methyl chloride)	ug/L	260	1100	ID	8600	45000	200 U	1.0 U	2.0 U	1000 U	1000 U	8.0 U	1000 U
cis-1,2-Dichloroethene	ug/L	70	70	620	93000	210000	**1700[abc]**	0.25 J	1.7 J	**1100[abc]**	**1200[abc]**	5.7 J	**9100[abc]**
cis-1,3-Dichloropropene	ug/L	NA	NA	NA	NA	NA	200 U	1.0 U	2.0 U	1000 U	1000 U	8.0 U	1000 U
Cyclohexane	ug/L	NA	NA	NA	NA	NA	200 U	1.0 U	2.0 U	1000 U	1000 U	8.0 U	1000 U
Dibromochloromethane	ug/L	80	80	ID	14000	110000	200 U	1.0 U	2.0 U	1000 U	1000 U	8.0 U	1000 U
Dichlorodifluoromethane (CFC-12)	ug/L	1700	4800	ID	220000	300000	200 U	1.0 U	2.0 U	1000 U	1000 U	8.0 U	1000 U
Ethylbenzene	ug/L	74	74	18	110000	170000	200 U	1.0 U	2.0 U	1000 U	1000 U	8.0 U	1000 U
Isopropyl benzene	ug/L	800	2300	28	56000	56000	200 U	1.0 U	2.0 U	1000 U	1000 U	8.0 U	1000 U
Methyl acetate	ug/L	NA	NA	NA	NA	NA	2000 U	10 U	20 U	10000 U	10000 U	80 U	10000 U
Methyl cyclohexane	ug/L	NA	NA	NA	NA	NA	200 U	1.0 U	2.0 U	1000 U	1000 U	8.0 U	1000 U
Methyl tert butyl ether (MTBE)	ug/L	40	40	7100	47000000	47000000	200 U	1.0 U	2.0 U	1000 U	1000 U	8.0 U	1000 U
Methylene chloride	ug/L	5	5	1500	220000	1400000	1000 U	5.0 U	10 U	5000 U	5000 U	40 U	5000 U
Styrene	ug/L	100	100	80	170000	310000	200 U	1.0 U	2.0 U	1000 U	1000 U	8.0 U	1000 U
Tetrachloroethene	ug/L	5	5	60	25000	170000	200 U	1.0 U	2.0 U	1000 U	1000 U	1.2 J	1000 U
Toluene	ug/L	790	790	270	530000	530000	200 U	1.0 U	2.0 U	1000 U	1000 U	8.0 U	1000 U
trans-1,2-Dichloroethene	ug/L	100	100	1500	85000	200000	94 J	1.0 U	0.42 J	1000 U	1000 U	8.0 U	**660 J[ab]**
trans-1,3-Dichloropropene	ug/L	NA	NA	NA	NA	NA	200 U	1.0 U	2.0 U	1000 U	1000 U	8.0 U	1000 U
Trichloroethene	ug/L	5	5	200	2200	4900	**5000[abcde]**	**6.1[ab]**	**47[ab]**	**25000[abcde]**	**27000[abcde]**	**140[ab]**	**23000[abcde]**
Trichlorofluoromethane (CFC-11)	ug/L	2600	7300	NA	1100000	1100000	200 U	1.0 U	2.0 U	1000 U	1000 U	8.0 U	1000 U
Trifluorotrichloroethane (CFC-113)	ug/L	170000	170000	32	170000	170000	200 U	1.0 U	2.0 U	1000 U	1000 U	8.0 U	1000 U
Vinyl chloride	ug/L	2	2	13	1100	13000	200 U	1.0 U	2.0 U	1000 U	1000 U	8.0 U	1000 U
Xylenes (total)	ug/L	280	280	49	190000	190000	400 U	2.0 U	4.0 U	2000 U	2000 U	16 U	2000 U

Notes:
-- Not analyzed.
ug/L - Microgram per liter.
[1] MDEQ (Michigan) Generic groundwater cleanup criteria, administrative rule R 299.44 effective December 30, 2013, pursuant to Part 201 of 1994 PA 451 as amended (Part 201 Groundwater Criteria).
NA - Criteria not available.
U - Not present at or above the associated value.
ID - Insufficient data to develop criterion.
2.6[ab] Indicates a concentration exceedance of Part 201 Cleanup Criteria.
J - Indicates an estimated value.

Table 4

Sample Analytical Summary Tables
Phase II ESA
(Tetra Tech, 10/2022)

TABLE B-1

FORMER HAWORTH PROPERTY SITE - CONCRETE PCB RESULTS SUMMARY

				East Room														
			Sample Location	CT01	CT02		CT03	CT04	CT05	CT06	CT07	CT08	CT09	CT10			CT11	CT12	CT13
Analyte	TSCA Regulated Criteria	TSCA Waste Criteria	Depth interval (inches)	0-4	0-12	12-16	0-12	0-11.5	0-12	0-12	0-12	0-12	0-7.5	0-12	12-24	24-36	0-12	0-9	0-12
Aroclor-1016	1	50		0.33 U	3.0 U	0.33 U	5.0 U	20 U	20 U	1.0 U	6.0 U	2.0 U	30 U	0.33 U	1.0 U	3.0 U	3.0 U	5.0 U	0.33 U
Aroclor-1221	1	50		0.33 U	3.0 U	0.33 U	5.0 U	20 U	20 U	1.0 U	6.0 U	2.0 U	30 U	0.33 U	1.0 U	3.0 U	3.0 U	5.0 U	0.33 U
Aroclor-1232	1	50		0.33 U	3.0 U	0.33 U	5.0 U	20 U	20 U	1.0 U	6.0 U	2.0 U	30 U	0.33 U	1.0 U	3.0 U	3.0 U	5.0 U	0.33 U
Aroclor-1242	1	50		0.33 U	3.0 U	0.33 U	5.0 U	20 U	20 U	1.0 U	6.0 U	2.0 U	30 U	0.33 U	1.0 U	3.0 U	3.0 U	5.0 U	0.33 U
Aroclor-1248	1	50		0.33 U	3.0 U	0.33 U	5.0 U	20 U	20 U	1.0 U	6.0 U	2.0 U	30 U	0.33 U	1.0 U	3.0 U	3.0 U	5.0 U	0.33 U
Aroclor-1254	1	50		1.7	26	0.33 U	28	94	126	6.0	39	13	262	0.7	7.0	20	13	34	1.9
Aroclor-1260	1	50		0.33 U	3.0 U	0.33 U	5.0 U	20 U	20 U	1.0 U	6.0 U	2.0 U	30 U	0.33 U	1.0 U	3.0 U	3.0 U	5.0 U	0.33 U

Notes:

mg/kg - milligrams per kilogram

TSCA - Toxic Substances Control Act

Results and criteria are provided in mg/kg

Result exceeds the TSCA-regulated criteria of 1.0 mg/kg

Result exceeds TSCA waste criteria of 50.0 mg/kg

U - The result was not detected above the laboratory reporting limit

UJ - The analyte was not detected above the laboratory reporting limit, which is considered approximate due to deficiencies in the quality control criteria

TABLE B-1

FORMER HAWORTH PROPERTY SITE - CONCRETE PCB RESULTS SUMMARY

				East Room																
			Sample Location	CT14	CT15	CT16	CT17			CT17B	CT18	CT19		CT20			CT21			
Analyte	TSCA Regulated Criteria	TSCA Waste Criteria	Depth interval (inches)	0-11	0-8	0-12	0-12	12-24	24-36	0-9	0-9.5	0-12	12-19	0-12	12-24	24-36	0-12	12-24	24-36	
Aroclor-1016	1	50		5.0 U	0.33 U	5.0 U	100 U	1.0 U	0.33 U	0.33 U	0.50 U	0.33 U	0.33 U	1000 U	1000 U	30 U	0.33 U	0.33 U	0.33 U	
Aroclor-1221	1	50		5.0 U	0.33 U	5.0 U	100 U	1.0 U	0.33 U	0.33 U	0.50 U	0.33 U	0.33 U	1000 U	1000 U	30 U	0.33 U	0.33 U	0.33 U	
Aroclor-1232	1	50		5.0 U	0.33 U	5.0 U	100 U	1.0 U	0.33 U	0.33 U	0.50 U	0.33 U	0.33 U	1000 U	1000 U	30 U	0.33 U	0.33 U	0.33 U	
Aroclor-1242	1	50		5.0 U	0.33 U	5.0 U	100 U	1.0 U	0.33 U	0.33 U	0.50 U	0.33 U	0.33 U	1000 U	1000 U	30 U	0.33 U	0.33 U	0.33 U	
Aroclor-1248	1	50		5.0 U	0.33 U	5.0 U	100 U	1.0 U	0.33 U	0.33 U	0.50 U	0.33 U	0.33 U	1000 U	1000 U	30 U	0.33 U	0.33 U	0.33 U	
Aroclor-1254	1	50		50	0.33 U	23	405	6.0	0.33 U	0.33 U	2.4	0.33 U	3.5	8920	3660	253	0.33 U	0.33 U	0.33 U	
Aroclor-1260	1	50		5.0 U	0.33 U	5.0 U	100 U	1.0 U	0.33 U	0.33 U	0.50 U	0.33 U	0.33 U	1000 U	1000 U	30 U	0.33 U	0.33 U	0.33 U	

Notes:

mg/kg - milligrams per kilogram

TSCA - Toxic Substances Control Act

Results and criteria are provided in mg/kg

Result exceeds the TSCA-regulated criteria of 1.0 mg/kg

Result exceeds TSCA waste criteria of 50.0 mg/kg

U - The result was not detected above the laboratory reporting limit

UJ - The analyte was not detected above the laboratory reporting limit, which is considered approximate due to deficiencies in the quality control criteria

TABLE B-1

FORMER HAWORTH PROPERTY SITE - CONCRETE PCB RESULTS SUMMARY

				East Room										West Room
			Sample Location	CT22	CT23	CT24			CT25	CT26			CT27	CT28	CT43
Analyte	TSCA Regulated Criteria	TSCA Waste Criteria	Depth interval (inches)	0-12	0-5.5	0-12	12-24	24-36	0-12	0-12	12-24	24-36	0-12	0-12	0-6.5
Aroclor-1016	1	50		1.00 U	0.33 U	0.33 U	0.33 U	0.33 U	5.0 U	0.33 U	0.33 U	0.33 U	1.0 U	0.50 U	0.33 U
Aroclor-1221	1	50		1.00 U	0.33 U	0.33 U	0.33 U	0.33 U	5.0 U	0.33 U	0.33 U	0.33 U	1.0 U	0.50 U	0.33 U
Aroclor-1232	1	50		1.00 U	0.33 U	0.33 U	0.33 U	0.33 U	5.0 U	0.33 U	0.33 U	0.33 U	1.0 U	0.50 U	0.33 U
Aroclor-1242	1	50		1.00 U	0.33 U	0.33 U	0.33 U	0.33 U	5.0 U	0.33 U	0.33 U	0.33 U	1.0 U	0.50 U	0.33 U
Aroclor-1248	1	50		1.00 U	0.33 U	0.33 U	0.33 U	0.33 U	5.0 U	0.33 U	0.33 U	0.33 U	1.0 U	0.50 U	0.33 U
Aroclor-1254	1	50		9.0	0.33 U	0.33 U	0.33 U	0.33 U	29	0.33 U	0.33 U	0.33 U	2.5	3.2	0.33 U
Aroclor-1260	1	50		1.00 U	0.33 U	0.33 U	0.33 U	0.33 U	5.0 U	0.33 U	0.33 U	0.33 U	1.0 U	0.50 U	0.33 U

Notes:

mg/kg - milligrams per kilogram

TSCA - Toxic Substances Control Act

Results and criteria are provided in mg/kg

Result exceeds the TSCA-regulated criteria of 1.0 mg/kg

Result exceeds TSCA waste criteria of 50.0 mg/kg

U - The result was not detected above the laboratory reporting limit

UJ - The analyte was not detected above the laboratory reporting limit, which is considered approximate due to deficiencies in the quality control criteria

TABLE B-2

FORMER HAWORTH PROPERTY SITE - SOIL PCB RESULTS SUMMARY

				East Room													
			Sample Location	SS29				SS30				SS31				SS32	
Analyte	TSCA Regulated Criteria	TSCA Waste Criteria	Depth interval (inches)	0-12	12-24	24-36	36-48	0-12	12-24	24-36	36-48	0-12	12-24	24-36	36-48	0-12	12-24
Aroclor-1016	1	50		0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U
Aroclor-1221	1	50		0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U
Aroclor-1232	1	50		0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U
Aroclor-1242	1	50		0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U
Aroclor-1248	1	50		0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U
Aroclor-1254	1	50		0.33	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	4.5	0.50
Aroclor-1260	1	50		0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U

Notes:

mg/kg - milligrams per kilogram

TSCA - Toxic Substances Control Act

Results and criteria are provided in mg/kg

Result exceeds the TSCA-regulated criteria of 1.0 mg/kg

Result exceeds TSCA waste criteria of 50.0 mg/kg

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UJ - The analyte was not detected above the laboratory reporting limit, which is considered approximate due to deficiencies in the quality control criteria

J - The result is considered approximate

TABLE B-2

FORMER HAWORTH PROPERTY SITE - SOIL PCB RESULTS SUMMARY

				East Room															
			Sample Location	SS33				SS34						SS35				SS36			
Analyte	TSCA Regulated Criteria	TSCA Waste Criteria	Depth interval (inches)	0-12	12-24	24-36	36-48	0-12	0-12 DUP	12-24	12-24 DUP	24-36	36-48	0-12	12-48	24-36	36-48	0-12	12-24	24-36	36-48
Aroclor-1016	1	50		0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U
Aroclor-1221	1	50		0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U
Aroclor-1232	1	50		0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U
Aroclor-1242	1	50		0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U
Aroclor-1248	1	50		0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U
Aroclor-1254	1	50		0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U
Aroclor-1260	1	50		0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U

Notes:

mg/kg - milligrams per kilogram

TSCA - Toxic Substances Control Act

Results and criteria are provided in mg/kg

Result exceeds the TSCA-regulated criteria of 1.0 mg/kg

Result exceeds TSCA waste criteria of 50.0 mg/kg

U - The result was not detected above the laboratory reporting limit

UJ - The analyte was not detected above the laboratory reporting limit, which is considered approximate due to deficiencies in the quality control criteria

J - The result is considered approximate

TABLE B-2

FORMER HAWORTH PROPERTY SITE - SOIL PCB RESULTS SUMMARY

				East Room															
			Sample Location	SS37				SS38						SS39					
Analyte	TSCA Regulated Criteria	TSCA Waste Criteria	Depth interval (inches)	0-12	12-24	24-36	36-48	0-12	0-12 DUP	12-24	12-24 DUP	24-36	36-48	0-12	0-12 DUP	12-24	12-24 DUP	24-36	36-48
Aroclor-1016	1	50		0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	3.0 U	0.33 U	0.33 U	0.33 U	0.33 U
Aroclor-1221	1	50		0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	3.0 U	0.33 U	0.33 U	0.33 U	0.33 U
Aroclor-1232	1	50		0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	3.0 U	0.33 U	0.33 U	0.33 U	0.33 U
Aroclor-1242	1	50		0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	3.0 U	0.33 U	0.33 U	0.33 U	0.33 U
Aroclor-1248	1	50		0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	3.0 U	0.33 U	0.33 U	0.33 U	0.33 U
Aroclor-1254	1	50		0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	1.3 J	8.0 J	0.50 J	0.33 UJ	0.33 U	0.33 U
Aroclor-1260	1	50		0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	0.33 U	3.0 U	0.33 U	0.33 U	0.33 U	0.33 U

Notes:

mg/kg - milligrams per kilogram

TSCA - Toxic Substances Control Act

Results and criteria are provided in mg/kg

Result exceeds the TSCA-regulated criteria of 1.0 mg/kg

Result exceeds TSCA waste criteria of 50.0 mg/kg

U - The result was not detected above the laboratory reporting limit

UJ - The analyte was not detected above the laboratory reporting limit, which is considered approximate due to deficiencies in the quality control criteria

J - The result is considered approximate

TABLE B-2

FORMER HAWORTH PROPERTY SITE - SOIL PCB RESULTS SUMMARY

				East Room							West Room
			Sample Location	SS40				SS41	SS42		SS44
Analyte	TSCA Regulated Criteria	TSCA Waste Criteria	Depth interval (inches)	0-12	12-24	24-36	36-48	0-48	0-48	0-48 DUP	0-12
Aroclor-1016	1	50		3.0 U	0.50 U	0.33 U	0.33 U	5.0 U	15 U	15 U	0.33 U
Aroclor-1221	1	50		3.0 U	0.50 U	0.33 U	0.33 U	5.0 U	15 U	15 U	0.33 U
Aroclor-1232	1	50		3.0 U	0.50 U	0.33 U	0.33 U	5.0 U	15 U	15 U	0.33 U
Aroclor-1242	1	50		3.0 U	0.50 U	0.33 U	0.33 U	5.0 U	15 U	15 U	0.33 U
Aroclor-1248	1	50		3.0 U	0.50 U	0.33 U	0.33 U	5.0 U	15 U	15 U	0.33 U
Aroclor-1254	1	50		13	4.6	0.33 U	0.33 U	46	63 J	134 J	0.80
Aroclor-1260	1	50		3.0 U	0.50 U	0.33 U	0.33 U	5.0 U	15 U	15 U	0.33 U

Notes:

mg/kg - milligrams per kilogram

TSCA - Toxic Substances Control Act

Results and criteria are provided in mg/kg

Result exceeds the TSCA-regulated criteria of 1.0 mg/kg

Result exceeds TSCA waste criteria of 50.0 mg/kg

U - The result was not detected above the laboratory reporting limit

UJ - The analyte was not detected above the laboratory reporting limit, which is considered approximate due to deficiencies in the quality control criteria

J - The result is considered approximate

TABLE B-3

FORMER HAWORTH PROPERTY SITE - WASTE DISPOSAL RESULTS SUMMARY

			Soil				Concrete			IDW	
			East Room			West Room	East Room		West Room		
		Sample Location	SS41		SS42	SS44	CT27	CT28	CT43	SSWASTE	CTWASTE
Analyte	Disposal Criteria	Depth interval (inches)	0-48	0-48 DUP	0-48	0-12	0-12	0-12	0-6.5		
Benzene, TCLP	0.5		0.10 U	0.10 U	0.10 U	0.10 U	0.10 U	0.10 U	0.10 U	0.10 U	0.10 U
Carbon tetrachloride, TCLP	0.5		0.10 U	0.10 U	0.10 U	0.10 U	0.10 U	0.10 U	0.10 U	0.10 U	0.10 U
Chlorobenzene, TCLP	100		0.10 U	0.10 U	0.10 U	0.10 U	0.10 U	0.10 U	0.10 U	0.10 U	0.10 U
Chloroform, TCLP	6		0.10 U	0.10 U	0.10 U	0.10 U	0.10 U	0.10 U	0.10 U	0.10 U	0.10 U
1,4-Dichlorobenzene, TCLP	7.5		0.10 U	0.10 U	0.10 U	0.10 U	0.10 U	0.10 U	0.10 U	0.10 U	0.10 U
1,2-Dichloroethane, TCLP	0.5		0.10 U	0.10 U	0.10 U	0.10 U	0.10 U	0.10 U	0.10 U	0.10 U	0.10 U
1,1-Dichloroethene, TCLP	0.7		0.10 U	0.10 U	0.10 U	0.10 U	0.10 U	0.10 U	0.10 U	0.10 U	0.10 U
2-Butanone (MEK), TCLP	200		1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
Tetrachloroethene, TCLP	0.7		0.10 U	0.10 U	0.10 U	0.10 U	0.10 U	0.10 U	0.10 U	0.10 U	0.10 U
Trichloroethene, TCLP	0.5		0.10 U	0.10 U	0.10 U	0.10 U	0.10 U	0.10 U	0.10 U	0.10 U	0.10 U
Vinyl chloride, TCLP	0.2		0.10 U	0.10 U	0.10 U	0.10 U	0.10 U	0.10 U	0.10 U	0.10 U	0.10 U
2-Methylphenol (o-Cresol), TCLP	200		1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
3-, 4-Methylphenol (p,m-Cresol), TCLP	200		1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
Pentachlorophenol, TCLP	100		1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
2,4,5-Trichlorophenol, TCLP	400		1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
2,4,6-Trichlorophenol, TCLP	2		1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
2,4-Dinitrotoluene, TCLP	0.13		0.090 U	0.090 U	0.090 U	0.090 U	0.090 U	0.090 U	0.090 U	0.090 U	0.090 U
Hexachlorobenzene, TCLP	0.13		0.090 U	0.090 U	0.090 U	0.090 U	0.090 U	0.090 U	0.090 U	0.090 U	0.090 U
Hexachlorobutadiene, TCLP	0.5		0.10 U	0.10 U	0.10 U	0.10 U	0.10 U	0.10 U	0.10 U	0.10 U	0.10 U
Hexachloroethane, TCLP	3		0.10 U	0.10 U	0.10 U	0.10 U	0.10 U	0.10 U	0.10 U	0.10 U	0.10 U
Nitrobenzene, TCLP	2		0.10 U	0.10 U	0.10 U	0.10 U	0.10 U	0.10 U	0.10 U	0.10 U	0.10 U
Pyridine, TCLP	5		0.10 U	0.10 U	0.10 U	0.10 U	0.10 U	0.10 U	0.10 U	0.10 UJ	0.10 UJ
Arsenic, TCLP	5		0.020 U	0.020 U	0.020 U	0.020 U	0.020 U	0.020 U	0.020 U	0.020 U	0.020 U
Barium, TCLP	100		0.090	0.28	0.24	0.34	0.38	0.14	0.15	0.33	0.20
Cadmium, TCLP	1		0.0050 U	0.0050 U	0.0050 U	0.0050	0.0050 U	0.0050 U	0.0050 U	0.0050 U	0.0050 U
Chromium, TCLP	5		0.050 U	0.050 U	0.050 U	0.050 U	0.080	0.070	0.070	0.050 U	0.080
Lead, TCLP	5		0.030 U	0.030 U	0.030 U	0.030 U	0.030 U	0.030 U	0.030 U	0.030 U	0.030 U
Mercury, TCLP	0.2		0.00050 U	0.00050 U	0.00050 U	0.00050 U	0.00050 U	0.00050 U	0.00050 U	0.00050 U	0.00050 U
Selenium, TCLP	1		0.050 U	0.050 U	0.050 U	0.050 U	0.050 U	0.050 U	0.050 U	0.050 U	0.050 U
Silver, TCLP	5		0.0050 U	0.0050 U	0.0050 U	0.0050 U	0.0050 U	0.0050 U	0.0050 U	0.0050 U	0.0050 U

Notes

IDW - Investigative Derived Waste

mg/L - milligrams per liter

Results and criteria are provided in mg/L

U - The result was not detected above the laboratory reporting limit

UJ - The analyte was not detected above the laboratory reporting limit, which is considered approximate due to deficiencies in the quality control criteria

ATTACHMENTS

Attachment A

Preferred Site Conceptual Plan and Renderings

DOUGLAS MICHIGAN

sheet of 1 | 1

REVISED CONCEPT

200 BLUE STAR HIGHWAY
DOUGLAS, MI 49406

ILLUSTRATIVE CONCEPT PLAN

02.06.24

QUICK CONCEPT STATS

Parcel Size = 7.2 acres

Linear Park Size = 0.5 acres

Proposed Trees = +157 trees

- Reforested Buffers = ±0.7 acres

Potential Total Dwelling Unit Range = 46 to 92 units

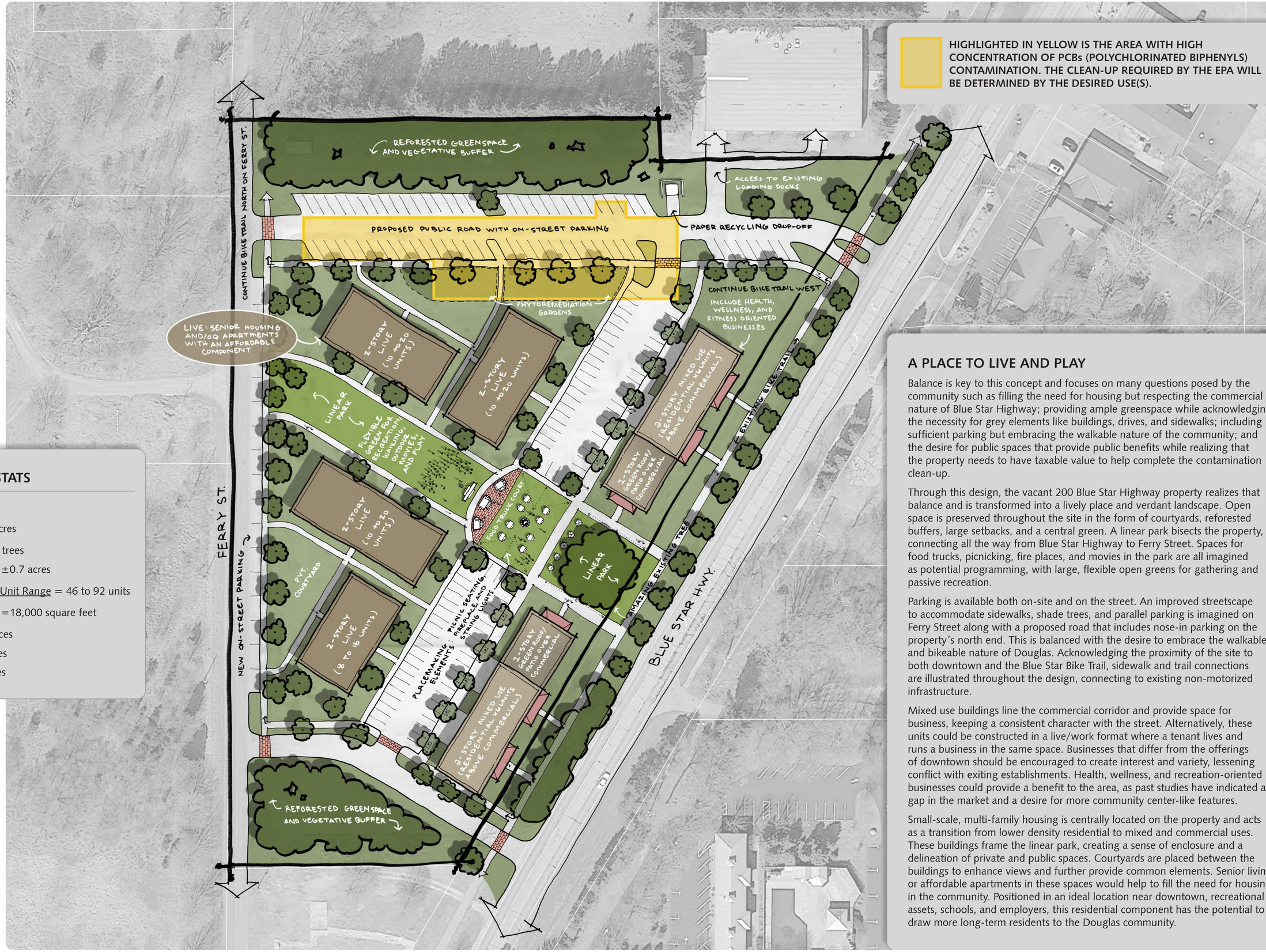
Total Commercial Space =18,000 square feet

Total Parking = 174 spaces

- Off-street = 88 spaces
- On-street = 86 spaces

0' 20' 40' 80'

williams&works
engineers | surveyors | planners



HIGHLIGHTED IN YELLOW IS THE AREA WITH HIGH CONCENTRATION OF PCBs (POLYCHLORINATED BIPHENYLS) CONTAMINATION. THE CLEAN-UP REQUIRED BY THE EPA WILL BE DETERMINED BY THE DESIRED USE(S).

A PLACE TO LIVE AND PLAY

Balance is key to this concept and focuses on many questions posed by the community such as filling the need for housing but respecting the commercial nature of Blue Star Highway; providing ample greenspace while acknowledging the necessity for grey elements like buildings, drives, and sidewalks; including sufficient parking but embracing the walkable nature of the community; and the desire for public spaces that provide public benefits while realizing that the property needs to have taxable value to help complete the contamination clean-up.

Through this design, the vacant 200 Blue Star Highway property realizes that balance and is transformed into a lively place and verdant landscape. Open space is preserved throughout the site in the form of courtyards, reforested buffers, large setbacks, and a central green. A linear park bisects the property, connecting all the way from Blue Star Highway to Ferry Street. Spaces for food trucks, picnicking, fire places, and movies in the park are all imagined as potential programming, with large, flexible open greens for gathering and passive recreation.

Parking is available both on-site and on the street. An improved streetscape to accommodate sidewalks, shade trees, and parallel parking is imagined on Ferry Street along with a proposed road that includes nose-in parking on the property's north end. This is balanced with the desire to embrace the walkable and bikeable nature of Douglas. Acknowledging the proximity of the site to both downtown and the Blue Star Bike Trail, sidewalk and trail connections are illustrated throughout the design, connecting to existing non-motorized infrastructure.

Mixed use buildings line the commercial corridor and provide space for business, keeping a consistent character with the street. Alternatively, these units could be constructed in a live/work format where a tenant lives and runs a business in the same space. Businesses that differ from the offerings of downtown should be encouraged to create interest and variety, lessening conflict with exiting establishments. Health, wellness, and recreation-oriented businesses could provide a benefit to the area, as past studies have indicated a gap in the market and a desire for more community center-like features.

Small-scale, multi-family housing is centrally located on the property and acts as a transition from lower density residential to mixed and commercial uses. These buildings frame the linear park, creating a sense of enclosure and a delineation of private and public spaces. Courtyards are placed between the buildings to enhance views and further provide common elements. Senior living or affordable apartments in these spaces would help to fill the need for housing in the community. Positioned in an ideal location near downtown, recreational assets, schools, and employers, this residential component has the potential to draw more long-term residents to the Douglas community.


NOODLE HOUSE