

MEMO

ASTI Environmental

Date: May 3, 2017

To: David Stollman

From: Brian Kuberski

Subject: Potential Due Care, 7850 E. Jefferson Avenue, Detroit, MI (ASTI Project No. 10105)

The following list is based on the report titled Limited Subsurface Investigation dated April 25, 2017 for the property located at 7850 E. Jefferson, Detroit, Michigan (the Property). The Property is currently vacant and may be developed with a high-rise apartment building and parking areas. The potential due care activities listed below are based on this intended future use, and any change to that use may require modifications to the Due Care Plan. Development plans have not been provided to ASTI. The below discussed potential due care obligations are based on similar developments with similar impacts. For a detailed discussion on due care obligations and necessary response activities, completion of a Due Care Plan after determining development plans is recommended.

Background

A Limited Subsurface Investigation was completed by ASTI on April 7, 2017 consisting of the advancement of five soil borings and collection of five soil samples. The metal mercury was detected in three soil sample above the Generic Residential Cleanup Criteria (GRCC) for groundwater surface water interface protection. The meal lead was detected in a soil sample collected at 0.5-1.5 feet below ground surface above the GRCC for direct contact.

Based on the information provided to ASTI that the Property will be developed for multi-family residential, the GRCC would be the appropriate criteria to compare the analytical data to determine the potential due care obligations. The likely applicable pathways for due care would be the soil volatilization to indoor air inhalation (SVIAI), particulate soil inhalation (PSI), and direct contact (DC). Based on the limited sampling completed, there is a potential unacceptable risk due to the detection of lead above the GRCC for DC.

Pre-Construction

The following activities will need to be implemented:

1. Prior to utility construction, the Property owner and/or occupant will provide notice to all third parties including, but not limited to, utility contractors or subcontractors conducting work on the Property that might come into contact with groundwater or soil. Contractors shall be notified in writing of the general nature and extent of contamination in the groundwater and soil.

Construction

The following activities will likely be needed during construction:

2. Construction plans are recommended to be reviewed by an environmental professional prior to commencement of construction.
3. The proposed parking and drive areas will be paved to act as a contact barrier to mitigate direct contact



10448 Citation Drive, #100
P.O. Box 2160
Brighton, Michigan 48116
Phone: 810.225.2800 Fax: 810.225.3800

and particulate inhalation risks.

4. Any proposed green space will be covered with a minimum of 12 inches of uncontaminated materials to act as a contact barrier to mitigate direct contact risks.
5. All soils excavated from the Property will be transported off site for disposal in a Type II landfill in accordance with applicable laws and regulations, or will be sufficiently characterized to document alternative disposal options. Copies of load tickets, bills of lading, or manifests for each load sent to the landfill will be maintained by the owner or operator.
6. Any groundwater encountered during dewatering activities will be stored on the Property and transported off the Property for disposal in accordance with applicable laws and regulations. Copies of manifests for each shipment transported for disposal will be maintained by the owner or operator.

Operation

The following activities will likely be needed after construction:

7. All third parties, including, but not limited to, utility contractors or subcontractors conducting work on the Property who may come into contact with soil or groundwater shall be notified in writing of the general nature and extent of contamination in the soil.
8. The paving and green space cover will be inspected by maintenance personnel on at least a semi-annual basis in April and September to document that they continue to provide an adequate barrier. Inspection findings will be documented on a form.
9. Reasonable cooperation, assistance, and access will be provided to persons that are authorized to conduct monitoring or response activities at the facility. Said persons include, but are not limited to, previous owners and the Michigan Department of Environmental Quality.
10. All work involving contact, or the potential for contact, with soil shall be completed in compliance with applicable federal, state, and local environmental health and safety requirements.
11. All soils excavated from the Property will be transported off site for disposal in a Type II landfill in accordance with applicable laws and regulations, or will be sufficiently characterized to document alternative disposal options. Copies of load tickets, bills of lading, or manifests for each load sent to the landfill will be maintained by the owner or operator.



10448 Citation Drive, #100
P.O. Box 2160
Brighton, Michigan 48116
Phone: 810.225.2800 Fax: 810.225.3800