

RESPONSE ACTIVITY PLAN

for

Pittsfield Charter Township

of the

Undeveloped Parcel (3.98 acres)

**Southwest Corner of West Waters Road and
Oak Valley Drive (Parcel: L-12-07-200-03)**

Pittsfield Township, Michigan 48103

Revised:

February 13, 2019

ECT No. 180469-0300

Document Review

The dual signatory process is an integral part of Environmental Consulting & Technology, Inc.'s (ECT's) Document Review Policy No. 9.03. All ECT documents undergo technical/peer review prior to dispatching these documents to any outside entity.

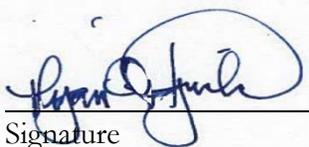
The environmental assessment described herein was conducted by the undersigned employees of ECT. ECT's investigation consisted solely of the activities described in the Introduction of this report, and in accordance with the Terms and Conditions of the Standard Consulting Services Agreement signed prior to initiation of the assessment, as applicable.

We declare that, to the best of our professional knowledge and belief, we meet the definition of environmental professionals as defined in §312.10 of 40 C.F.R. 312. We have the specific qualifications based on education, training, and experience to assess a property of the nature, history, and setting of the Subject Property. We have developed and performed the all appropriate inquiries in conformance with the standards and practices set forth in 40 C.F.R. Part 312.

This document has been authored and reviewed by the following employees:

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December 5, 2018

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December 5, 2018

Date

Table of Contents

<u>Section</u>	<u>Page</u>
1.0 Introduction	1
2.0 Background	2
2.1 Summary of Environmental Findings	2
3.0 Detailed Characteristics of Proposed Property Use	3
4.0 Hazardous Substance Information	9
4.1 Location of Hazardous Substances	9
4.2 Exposure Pathways and Exceeding Criteria	10
5.0 Plan for Response Activities	11
5.1 Soil Management Plan	11
5.1.1 Health and Safety Plan	11
5.1.2 Control of Work Area	11
5.1.3 Soil Characterization	11
5.1.4 Unexpected Conditions	13
5.1.5 Soil Stockpile Management	13
5.1.6 Dust Control	13
5.1.7 Surface Water Protection	13
5.1.8 Decontamination	13
6.0 Evaluation and Demonstration of Compliance with Section 7A Obligations	14
6.1 Exacerbation	14
6.2 Preventing Unacceptable Human Risk	14
6.3 Taking Reasonable Precautions	14
6.4 Reasonable Cooperation with Response Activities	14
6.5 Use Restriction Compliance	15
6.6 Effectiveness or Integrity of Use Restrictions	15

7.0	Notification Requirements	16
7.1	Rule 1013 Notice - Utility/Easement Holders	16
7.2	Rule 1015 Notice -Abandoned Containers	16
7.3	Rule 1017 Notice - Migrating Contamination	16
7.4	Rule 1019 Notice -Fire/Explosion Hazards	16
7.5	Soil Movement Notice	17
8.0	Compliance with Land Use Restrictions and Institutional Controls	11
8.1	Cooperation, Assistance, and Access	11
8.2	Compliance with Information Requests and Administrative Subpoenas	11
9.0	Limitations	12
10.0	References	13

TABLES

Table 1 – Soil Analytical Summary

FIGURES

Figure 1 – Site Location Map
Figure 2 – Site and Surrounding Properties Map
Figure 3 – Boring Location Map

List of Acronyms

AAI	All Appropriate Inquiry
ASTM	American Society for Testing and Materials
BEA	Baseline Environmental Assessment
bgs	Below ground surface
DC	Direct Contact
DWP	Drinking Water Protection
ECT	Environmental Consulting & Technology, Inc.
ESA	Environmental Site Assessment
GRCC	Generic Residential Cleanup Criteria
GSI	Groundwater Surface Water Interface
MBSS	Michigan Background Soil Survey
MDEQ	Michigan Department of Environmental Quality
NREPA	Natural Resources and Environmental Protection Act
RCRA	Resource Conservation and Recovery Act
RAP	Response Activity Plan
REC	Recognized Environmental Condition
ug/kg	Micrograms per kilograms

1.0 Introduction

Environmental Consulting & Technology, Inc. (ECT) has prepared this Response Activity Plan (RAP) for the undeveloped parcel located at the southwest corner of the intersection of West Waters Road and Oak Valley Drive, in Pittsfield Charter Township, Washtenaw County, Michigan (hereafter referred to as the Subject Property).

Appropriate due diligence and limited subsurface investigation activities have been conducted at the Subject Property as a prerequisite to property use activities and property transfer. In October 2018, ECT's Phase II Environmental Site Assessment (ESA) produced reliable data to show shallow soil at the Subject Property are affected with concentrations of contaminants originating from historic on-site land uses that qualify the Subject Property as a "Facility" pursuant Part 201 of the Natural Resources and Environmental Protection Act (NREPA), Public Act 451 of 1994, as amended. Accordingly, the Subject Property's current and prospective owners (referred to hereafter as the Submitters) hereby acknowledge due care obligations pursuant to Section 20107a of Part 201 of NREPA with respect to:

- Preventing exacerbation of the pre-existing contamination.
- Preventing unacceptable human exposure and mitigating fire and explosion hazards to allow for the intended use of the Subject Property in a manner that protects public health and safety.
- Taking reasonable precautions against the reasonably foreseeable acts or omissions of a third party.
- Providing reasonable cooperation, assistance, and access to persons authorized to conduct response activities at the Subject Property, including the cooperation and access necessary for the installation, operation, and maintenance of any response activity at the Subject Property.
- Complying with any land use or resource use restrictions established or relied on in connection with any response activity at the Subject Property.
- Not impeding the effectiveness or integrity of any land use engineering control or resource use restriction employed at the Subject Property in connection with any response activity.

This plan provides the information to document due care compliance based on the results of the subsurface investigation activities completed by ECT, and describes the activities that shall be undertaken at the Subject Property to demonstrate compliance with Section 20107a of Part 201 of NREPA.

2.0 Background

The Subject Property is comprised of a single parcel (#L-12-07-200-003) containing approximately 3.98 acres of undeveloped land. The Subject Property is part of the Northwest $\frac{1}{4}$ of Section 7, Township 3 South, Range 6 East, in Washtenaw County, Michigan and is situated along the south side of West Waters Road and along the west side of Oak Valley Drive. Additionally, ECT extrapolated the latitude and longitude for the approximate center of the Subject Property, which are 42.2424710 and 83.7719150 degrees, respectively.

The Subject Property is undeveloped and currently covered by grass and dense woodland. Overhead utility lines transect through the south-central portion of the Subject Property, and a drain is located within the vegetated area throughout the southern portion of the Subject Property. The elevation of the Subject Property is approximately three (3) feet higher than the sidewalk bordering to the north. The surrounding area is a mixture of residential and commercial properties. The location of the Subject Property is indicated on **Figure 1**, Site Location Map. The general layout of the property is presented on **Figure 2**, Site and Surrounding Properties Map. The legal description of the Subject Property is below:

Parcel #L-12-07-200-003: “*OLD SID – L-12-007-019-00 PI 7-5H-1 COM AT N $\frac{1}{4}$ COR OF SEC 7, TH W 649.95 FT ON N/L OF SECTO POB, TH W 292 FT ON SAID N/L, TH DEFL 89-42-30 LFT 594 FT, TH DEFL 90-17-30 LFT 292 FT, TH DEFL 89-42-30 LFT 594 FT TO POB PART NW $\frac{1}{4}$ SEC 7 T3S R6E 3.98 AC.”

2.1 Summary of Environmental Findings

On August 10, 2018, ECT, on behalf of the Client, completed a Phase I ESA in general conformance with the scope and limitations of ASTM Practice E 1527-13 for the Subject Property. The Phase I ESA identified one (1) recognized environmental condition (REC) in connection with the Subject Property which is as follows:

- A geotechnical survey conducted on the Subject Property indicated that the site has been filled with compacted sand and occasional broken brick and concrete. There were no records available that provided information as to when the site was filled, the origin of the fill material, or if the fill material has been characterized for potential contaminants.

Based on a review of reasonably ascertainable historical records, the Subject Property has historically been used as agricultural land as early as 1937 through approximately the late 1980's. Currently, the Subject Property was undeveloped, covered by grass and densely vegetated woodland.

3.0 Detailed Characteristics of Proposed Property Use

The Submitters intend to hold the Subject Property and maintain it in a manner consistent with local zoning and land-use ordinances. (Operations will not involve the use of hazardous substances in a manner that would be considered a significant hazardous substance use as defined in Rule 901[o].) Key considerations that are pertinent to this type of Subject Property activity with respect to its due care compliance documentation are:

- The Submitters will not use or store significant quantities of hazardous substances or petroleum products at or on the Subject Property other than those quantities typically associated with routine Subject Property maintenance.
- The prospective owner of the Subject Property intends to utilize the parcel for passive recreation use and open green space.

4.0 Hazardous Substance Information

4.1 Location of Hazardous Substances

In evaluating the sample locations and analytical testing parameters described herein, the Submitters relied upon their consultants' best judgment of the hazardous substances most likely to be present as contaminants at the Subject Property based upon a variety of factors, including the results of a historical property use review and physical site reconnaissance performed in general conformance with the scope and limitations of American Society for Testing and Materials (ASTM) Practice E 1527-13. As a result of the identified REC in association with the Subject Property, site investigation activities were performed in September 2017. The results of the investigation are described in ECT's Phase II ESA, dated October 15, 2018. The investigation included the collection of four shallow soil samples by hand auger methods. The Boring Location Map is provided as **Figure 3**, which is a scaled site map depicting sample locations, depths, and contaminant concentrations.

The Soil Analytical Summary is provided as **Table 1** and compares the soil results to applicable Michigan Department of Environmental Quality (MDEQ) Part 201 Generic Residential Cleanup Criteria (GRCC). Although several results exceed the GRCC, the MDEQ allows comparison of these concentrations to a regionally based criteria that is more reflective of naturally occurring metals based on the local glacial geology. As such, these results are compared to the Michigan Background Soil Survey (MBSS) for topsoil within the Huron-Erie Glacial Lobe Area. A summary of the analytical soil results is presented below:

- Arsenic was detected in all soil samples at concentrations ranging between 6,300 to 9,700 micrograms per kilograms (ug/kg). Although these concentrations exceed the GRCC for drinking water protection (DWP) (4,600 ug/kg), groundwater surface water interface (GSI) (4,600 ug/kg) criteria, and direct contact (DC) (7,600 ug/kg) criteria at locations HA-1 and HA-2, they do not exceed the MBSS background criteria (11,000 ug/kg).
- Chromium (total) was detected in all soil samples at concentrations ranging between 17,800 to 21,900 ug/kg. Although the concentrations of chromium (total) in the soil samples collected from boring HA-2, HA-3, and HA-4 exceed the GSI (3,300 ug/kg) criteria, they do not exceed the MBSS background criteria (37,000 ug/kg).
- Selenium was detected in all soil samples at concentrations ranging between 6,000 to 7,700 ug/kg. The concentrations of selenium in all soil samples exceed the DWP (4,000 ug/kg) and GSI (400 ug/kg) criteria of the GRCC, as well as the MBSS background criteria (3,900 – 4,700 ug/kg).
- Other metals were detected in the soil samples; however, the concentrations were below their respective GRCC.
- PCBs were not detected in the soil samples.

Groundwater was not encountered during the investigation.

4.2 Exposure Pathways and Exceeding Criteria

Concentrations of selenium collected from the fill material on the Subject Property in September 2018 exceed the MDEQ Part 201 GRCC and MBSS, which present possible exposure pathways via migration to drinking water receptors and leaching to groundwater and migration to a GSI receptor. The Subject Property and surrounding properties are provided with potable water from Ypsilanti Community Utilities Authority; therefore, the groundwater migration to a drinking water receptor is not a significant exposure pathway. The fill material is reported to lie on the upper three feet of the Subject Property. Below the fill, ECT observed mostly brown clay with some sand. Based on the shallowness of the fill, hazardous substances will not migrate deeper into the groundwater aquifer; therefore, the leaching to groundwater and migration to a GSI receptor is not a significant exposure pathway.

Possible exposure pathways for impacted soil are as follows:

- Soil leaching to groundwater and migration to a drinking water receptor
- Soil leaching to a groundwater and migration to a GSI receptor
- Soil volatilization to an indoor air inhalation receptor
- Soil volatilization to an ambient air inhalation receptor
- Soil direct contact

Summary of Hazardous Substance Exceeding Generic Criteria and MBSS

Hazardous Substance	CAS #	Concentration	Sample Location	Criteria Exceeded
Selenium	7782-49-2	6,000 - 7,700 ug/kg	HA-1, 2, 3, and 4	DWP (4,000 ug/kg) GSI (400 ug/kg) MBSS (4,700 ug/kg)

5.0 Plan for Response Activities

The Submitters will implement response activities to prevent and mitigate unacceptable contaminant exposure to employees, consultants and contractors, the local public and environment.

The fill material with exceeding concentrations of selenium is covered by vegetation, which makes exacerbation through relocation of contaminated materials unlikely. Because shallow impacted soils are known to be present, due care activities with respect to the removal, relocation, and handling of soils will be necessary.

5.1 Soil Management Plan

Although extensive site grading activities are not anticipated and restricted only to the path system and park features, soil contamination may be encountered during construction. Please note that only a conceptual plan for the park has been prepared, however mass grading or excavation activities are not likely. All personnel, whether employees of the Township or contractors, conducting excavation or other soil-disturbing operations must be made aware that there is a potential for encountering contamination, and must know the procedures for dealing with contamination.

5.1.1 Health and Safety Plan

A health and safety plan that addresses the potential exposure to site contaminants and provides requirements to control such exposure, including appropriate engineering and administrative controls and personal protective equipment will be developed prior to any soil-disturbing activities.

In addition, open excavations will be demarcated with barricades and caution tape during periods of inactivity and at the end of each workday to reduce the potential of personnel falling into the excavations. The excavations will be maintained to mitigate physical hazards to personnel working in or entering the area after work is completed.

5.1.2 Control of Work Area

Before any soil-disturbing activities are conducted at the site, the Township or its contractor performing the work shall secure the work area to limit access to only those staff that are authorized. Excavation and construction activities shall be performed in a manner that minimizes worker exposure and protects the environment from site contaminants. A designated work area boundary shall be established for excavation and construction activities.

5.1.3 Soil Characterization

As a first step, the Township will devise and implement a sampling and analysis plan that utilizes incremental sampling methods to conduct additional sampling at the site. Based on the preliminary sampling data collected as part of the Phase II ESA, as well as discussion with MDEQ staff, the additional samples will be submitted to a commercial laboratory for the following analysis:

Contaminant	Criteria Exceeded	Analysis
Arsenic	DC, DWP, GSI	Total Arsenic – EPA Method 6020 SPLP Arsenic – EPA Method 1312
Chromium	GSI	Total Chromium – EPA Method 6020
Selenium	DWP, GSI	Total Selenium – EPA Method 6020 SPLP Selenium – EPA Method 1312
Polycyclic Aromatic Hydrocarbons (PAHs)		EPA Method 8270

The results of the sampling will be used for comparison to the Part 201 Generic Residential Cleanup Criteria (GRCC). Should the results not exceed any of the Part 201 GRCC, no additional response activities will be implemented. For contaminants that exceed the Part 201 GRCC, the Township and its consultant will develop site-specific criteria for recreational use. If the contaminant concentrations exceed the site-specific criteria, the Township will incorporate the appropriate engineering controls into the final engineering and site grading design. The engineering controls will be designed based on the site-specific criteria, and are as follows:

Direct Contact – The following engineering controls will be incorporated into the final site plan to eliminate the direct contact pathway:

Cover: Use of a soil barrier will be used if it feasible within the context of the final site design. Areas with soils exceeding the site-specific, direct contact criteria will be covered using two (2) feet of clean topsoil with an underlying geotextile fabric and stabilized with a specified seed mix to minimize erosion.

Removal: If cover is not feasible with respect to the final site design, or does not mitigate direct contact from the public, the soil will be excavated, transported to an appropriate facility for disposal, and replaced with clean fill. If excavation becomes necessary, additional analysis of the soils may be required by the disposal facility.

Drinking Water Protection – The Township does not intend to utilize groundwater resources for the purposes of drinking water or irrigation. In addition, connection to the water utility is mandatory per the Township Code of Ordinances.

Chapter 36 Utilities, Part 1 – Water and Sewerage System, Section 36-12

“Connection to the water and sewerage system; time limit. It shall be the duty of each owner, each occupant, and each person having control of an inhabited building to which a sanitary sewer and water main of the system shall become available, to connect the building sewer and water service line of said building with the sewer and water system within six months after notice of availability is sent at the direction of the Township Board of Trustees by United States mail addressed to the owner, occupant or person at the post office address of the building. After the expiration of the six-month period, it shall be unlawful for the owner, occupant or person to maintain or use a septic tank, cesspool or any other private means of disposal of sanitary sewage, or to continue to operate a private water supply in the building.”

Groundwater Surface Interface – Contaminated soils on the site will be managed either by cover, or removal, therefore the redevelopment of the Subject Property into a recreational use area will not exacerbate current conditions.

A preliminary conceptual design of the park includes the use of rain garden areas. To prevent stormwater infiltration through contaminated material, the rain garden areas will be excavated two (2) feet below the proposed grade, lined with a non-permeable geotextile fabric, backfilled with clean topsoil, and planted with native species. Excavated material will either be stored and capped on the site or transported to a disposal facility.

5.1.4 Unexpected Conditions

Excavation, grading or other soil-disturbing activities should immediately cease upon the discovery of potentially contaminated soil or other materials not previously identified (e.g., underground sumps or tanks). Evidence of potentially contaminated soil or other material includes, but is not limited to:

- Discolored soil;
- Odors;
- Readings on monitoring equipment indicating potential presence of contaminants;
- Presence of buried wastes, drums, pipes or other debris

5.1.5 Soil Stockpile Management

Soil stockpiles, if used, shall be covered with material adequate to prevent soil transport by wind or rainwater runoff. Covers shall be maintained in good condition. When not covered, soil stockpile surfaces will be kept visibly moist by water spray, as necessary.

5.1.6 Dust Control

During excavation, all exposed soil surfaces shall be kept visibly moist by water spray or covered with continuous heavy-duty plastic sheeting or other covering to minimize emissions of particulates into the atmosphere. Parking areas, staging areas, and traffic pathways on the site shall be cleaned as necessary to control dust emissions. Soil loaded into transport vehicles for off-site disposal shall be covered with tarps or other covering to minimize emissions into the atmosphere. The covering shall be in good condition, joined at the seams, and securely anchored.

5.1.7 Surface Water Protection

Excavated soil shall be managed in a way that will not cause sediment to enter storm water runoff. The best management practices listed below shall be applied to any excavation or construction work as applicable.

- Designating a completely contained area away from storm drains for refueling or maintenance work that must be performed at the site.
- Cleaning up all spills and leaks using dry methods (e.g., absorbent materials, rags).
- Dry-sweeping dirt from paved surfaces, for general cleanup.
- Implementing soil erosion and sedimentation control measures to protect storm drains and open water features using silt fencing, earth dikes, check dams or other controls to divert, trap and filter runoff.
- Not allowing rainfall or runoff to contact contaminated soil or debris.
- Scheduling excavation work for dry-weather periods, when possible.
- Avoiding over-application by water trucks for dust control.

5.1.8 Decontamination

Construction and excavation equipment should be performed using a brush or power washers (if appropriate) to loosen dirt. Cleaning water shall be discharged to the sanitary sewer in accordance with local requirements and shall not be allowed to discharge into the storm sewer system or surface water features.

6.0 Evaluation and Demonstration of Compliance with Section 7A Obligations

The due care obligations of the Submitters are described in Section 1.0, above. This section describes how the Submitters will comply with these obligations.

6.1 Exacerbation

Exacerbation occurs when an activity causes existing contamination to migrate beyond the original area of impact or the boundary of the Subject Property; accordingly, the proposed Subject Property use must not exacerbate existing contamination. The source of hazardous substances at the Subject Property has been covered by grass, and that makes exacerbation through relocation of contaminated materials unlikely.

6.2 Preventing Unacceptable Human Risk

An evaluation of existing site conditions has been completed; this evaluation has demonstrated that minimal potential exists for exposure to shallow soil contaminants based on known contaminant concentrations and their respective exposure pathways relevant to the intended use of the Subject Property.

6.3 Taking Reasonable Precautions

Precautions will be taken against the reasonably foreseeable acts or omissions of a third party. Personnel who may work at the Subject Property in the future will be notified by the Submitters of the presence and nature of existing contamination and will be provided access to this due care compliance documentation guidance.

Hazardous substances are not present at concentrations that present a fire or explosive hazard.

If excavation activities are conducted on the Subject Property, appropriate health and safety procedures will be followed. Health and safety procedures will apply to the Submitters, contractors and subcontractors, utility companies and their subcontractors, and public entities and their contractors. The Submitters will inform utility companies or public entities, whose contractors and subcontractors are not hired by the Submitters, of the presence of hazardous substances in the fill material.

6.4 Reasonable Cooperation with Response Activities

In the event additional response activities are required at the Subject Property in the future, the Submitters will provide reasonable cooperation, assistance, and access to authorized and qualified professionals to conduct

these activities, including the cooperation and access necessary for the installation, operation, and maintenance of any remedial action components.

6.5 Use Restriction Compliance

Restrictions on land or resource use have not been established or required in connection with the planned property use and response activities. If any land use or resource restrictions are placed on the Subject Property as a result of future investigations or findings, the Submitters will ensure compliance as appropriate.

6.6 Effectiveness or Integrity of Use Restrictions

Restrictions on land use or resource use have not been established or required in connection with the planned property use or response activities. If any land use or resource use restrictions are placed on the Subject Property as a result of future investigations or findings, the effectiveness and integrity of these restrictions will not be impeded.

7.0 Notification Requirements

The Submitters will maintain this documentation that due care obligations have been evaluated and response actions beyond those described in Section 5.0 are not warranted based on the planned use of the Subject Property. If requested, this documentation will be provided to the MDEQ.

The following provides a discussion of the notification requirements pertaining to utilities, easement holders, abandoned containers, migrating contamination, fire and explosion hazards, and soil movement.

7.1 Rule 1013 Notice - Utility/Easement Holders

Appropriate health and safety procedures will be followed during any future excavation activities that may be conducted at the Subject Property. Health and safety procedures will apply to the Submitters, contractors and subcontractors, utility companies and their subcontractors, and public entities and their contractors. The Submitters will inform utility companies or public entities, whose contractors and subcontractors are not hired by the Submitters, of the presence of shallow soil contamination at the Subject Property. Copies of this due care compliance documentation guidance will be provided to any construction contractors prior to performing subsurface activities at the Subject Property in order to inform these parties of due care precautions.

7.2 Rule 1015 Notice -Abandoned Containers

Based on the all appropriate inquiry and additional investigation conducted by the Submitters, there are no known abandoned containers on the Subject Property.

7.3 Rule 1017 Notice - Migrating Contamination

A geotechnical survey conducted on the Subject Property indicated that the site has been filled with compacted sand and occasional broken brick and concrete. The fill, identified with exceeding concentrations of selenium, is reported to lie on the upper three feet of the Subject Property. Below the fill, ECT observed mostly brown clay with some sand. Based on the shallowness of the fill, hazardous substances will not migrate deeper into the groundwater aquifer.

7.4 Rule 1019 Notice -Fire/Explosion Hazards

No known fire or explosion hazards are associated with the residual hazardous substances; therefore, a Rule 1019 notice is not required.

7.5 Soil Movement Notice

Any relocation of contaminated soil at the Subject Property will be consistent with Part 201 Rule 299.5542 (Relocation of Soil; notification of department under Section 20120c of NREPA). All soil removed from areas that have been shown to be impacted will be properly characterized and properly disposed.

8.0 Compliance with Land Use Restrictions and Institutional Controls

The Submitters will comply with any established land use restrictions and/or institutional controls and will not impede the effectiveness or integrity of any institutional control employed in connection with a response action.

8.1 Cooperation, Assistance, and Access

The Submitters will provide full cooperation, assistance, and access to persons who are authorized to conduct response actions at the Subject Property.

8.2 Compliance with Information Requests and Administrative Subpoenas

The Submitters will comply with any request for information issued by government agencies or authorities having jurisdiction.

The Submitters will maintain up-to-date documentation (such as photographs) of compliance with applicable due care responsibilities and continuing obligations, as applicable, and will make such documentation available to the MDEQ upon request.

9.0 Limitations

This response activity plan has been prepared based on the results of sampling and analytical testing performed in September 2018, together with an understanding of the Submitters' planned use of the Subject Property. In the event that the planned use of the Subject Property changes significantly, the due care compliance documentation guidance provided in this response activity plan should be revised to reflect the changes. Regardless of the intended use of the Subject Property, this due care compliance documentation guidance provided in this response activity plan is not intended for use as a site-specific health and safety plan.

10.0 References

Phase I Environmental Site Assessment, Undeveloped Parcel (3.98 acres), West Waters Road and Oak Valley Drive, Ann Arbor, Michigan, prepared by Environmental Consulting & Technology, Inc., August 10, 2018.

Phase II Environmental Site Assessment, Undeveloped Parcel (3.98 acres), West Waters Road and Oak Valley Drive, Ann Arbor, Michigan, prepared by Environmental Consulting & Technology, Inc., October 15, 2018.

Soils Investigation: Condominium Development, Waters Road and Oak Valley Drive, prepared by McDowell and Associates, December 30, 1998.