BASELINE ENVIRONMENTAL ASSESSMENT

Conducted Pursuant to Section 20126(1)(c) of 1994 PA 451, Part 201, as amended, and the Rules promulgated thereunder

FORMER KLEIN TOOLS PROPERTY 121 WATER STREET JONESVILLE, MICHIGAN

SME Project Number: LE61837A January 27, 2011





Submitter Information

MICHIGAN DEPARTMENT OF NATURAL RESOURCES AND ENVIRONMENT – REMEDIATION DIVISION PO BOX 30426, LANSING, MICHIGAN 48909-7926, Phone 517-373-9837, Fax 517-373-2637

FOR DNRE	
V.————	

Baseline Environmental Assessment Submittal Form

This form is for submittal of a Baseline Environmental Assessment (BEA), as defined by the Environmental Remediation, Part 201 of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended, and the Part 201 Rules promulgated thereunder, for the purpose of establishing an exemption to liability pursuant to Section 20126(1)(c) for a new owner or operator of property that is a facility as defined by Section 20101(1)(r). The BEA report must be conducted either prior to or within 45 days after becoming the owner or operator, whichever is earliest. This form and the BEA report must be submitted within 6 months of becoming the owner or operator whichever is earliest. A separate BEA is required for each legal entity that is or will be a new owner or operator of the property. To maintain the exemption to liability, the owner and operator must also disclose the BEA to any subsequent purchaser or transferee before conveying interest in the property pursuant to Section 20126(1)(c) and Rule 919. An owner or operator of a facility also has due care obligations under Section 20107a with respect to any existing contamination to prevent unacceptable exposure; prevent exacerbation; take reasonable precautions; provide reasonable cooperation, assistance, and access to authorized persons taking response activities at the property. Documentation of due care evaluations and response activities need to be available, but not submitted, to the DNRE within 8 months of becoming the owner or operator of a facility.

Name of legal entity that will own or operate the property: Village of Jonesville	Contact for BEA questions if different from submitter				
Address: 265 East Chicago Street	Name & Title: Brian S. Trent, P.E.; Project Engineer Company: Soil and Materials Engineers, Inc.				
City: Jonesville State: Michigan Zip: 49250	Company. Son and Materials Engineers, Inc.				
Contact person (Name & Title): Adam Smith; Village Manager	Address: 4705 Clyde Park Ave. SW				
T-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1	City: Grand Rapids State: Michigan Zip: 49509				
Telephone: (517) 849-2104 E-Mail: manager@jonesville.org	Telephone: (616) 406-1756 E-Mail: trent@sme-usa.com				
Property Information	2012年1月1日 - 1月1日 - 1月1				
Street Address of Property: 121 Water Street	County: Hillsdale				
City: Jonesville State: Michigan Zip: 49250	City/Village/Township: Jonesville				
Property Tax ID (include all applicable IDs): 06-060-001-004, 06-060-001-034, 06-060-001-036, and 06-060-001-038	Town: 6S Range: 3W Section: 4 Quarter: NW Quarter-Quarter: NE				
Address according to tax records, if different than above (include all applicable addresses):	Decimal Degrees Latitude: 41.9836 Decimal Degrees Longitude: 84.6643				
City: State: Zip: Status of submitter relative to the property (check all that apply):	Reference point for latitude and longitude: Center of site Main/front door Front gate/main entrance Other				
Former Current Prospective					
Owner	Collection method: Survey ☐ GPS ☐ Interpolation ☒				
	auto, E of a line polation Z				
Applicable Dates (provide date for all that are relevant):	MM/DD/YYYY				
Date All Appropriate Inquiry (AAI) Report or Phase I Environment	al Assessment Report completed: 12/28/2010				
Date Baseline Environmental Assessment Report conducted: 0	1/27/2011				
Date submitter first became the owner: 12/28/2010					
Date submitter first became the owner: 12/28/2010					
<u>Date submitter first became the owner:</u> 12/28/2010 <u>Date submitter first became the operator (if prior to ownership):</u>					
-					
Date submitter first became the operator (if prior to ownership):	<u>rs:</u>				
Date submitter first became the operator (if prior to ownership): Anticipated date of becoming the owner for prospective owners:					
Date submitter first became the operator (if prior to ownership): Anticipated date of becoming the owner for prospective owners: Anticipated date of becoming the operator for prospective operator if former owner or operator of this property, prior dates of being the	e owner or operator:				
Date submitter first became the operator (if prior to ownership): Anticipated date of becoming the owner for prospective owners: Anticipated date of becoming the operator for prospective operator	e owner or operator: apply):				
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Date submitter first became the operator (if prior to ownership): Anticipated date of becoming the owner for prospective owners: Anticipated date of becoming the operator for prospective operator if former owner or operator of this property, prior dates of being the source of contamination at the property (check all that are known to Facility regulated under Part 201, other source, or source unknown Part 201 Site ID, if known: Leaking Underground Storage Tank regulated pursuant to Part 21	e owner or operator: papply): n 3				
Date submitter first became the operator (if prior to ownership): Anticipated date of becoming the owner for prospective owners: Anticipated date of becoming the operator for prospective operator. If former owner or operator of this property, prior dates of being the source of contamination at the property (check all that are known to Facility regulated under Part 201, other source, or source unknown Part 201 Site ID, if known: Leaking Underground Storage Tank regulated pursuant to Part 21 Part 211/213. Facility ID, if known:	e owner or operator: papply): n 3				

Ch	eck the appropriate response to each of the following questions:	YES	NO
1.	Is the property at which the BEA was conducted a "facility" as defined by Section 20101?	\boxtimes	
2.	Is the All Appropriate Inquiry (AAI) compliant with 40 CFR 312, or is the Phase I Environmental Assessment compliant with ASTM E1527-05?	\boxtimes	
3.	Was the BEA, including the AAI and sampling, conducted either prior to or within 45 days of the date of becoming the owner, operator, or of foreclosure, whichever is earliest, or within the alternate time-frames provided in Part 201 Rule 905(3) for submitters involved in oil and gas development under Part 615 or 625 property, or Rule 905(9) for property acquired through condemnation procedures?		
4.	Is this BEA being submitted to the department within 6 months of the submitter first becoming the owner or operator, or foreclosing?		
5.	If the BEA relies on studies or data prepared by others or conducted for other purposes, does the BEA provide sufficient rationale to demonstrate that the data are reliable and relevant to define conditions at the property at the time of purchase, occupancy, or foreclosure?	\boxtimes	
6.	Does this BEA contain the legal description of the property addressed by the BEA?	\boxtimes	
7.	Does this BEA contain the environmental analytical results, a scaled map showing the sample locations, and the basis for the determination that the property is a facility as defined by Section 20101(1)(f)?		

Environmental Professional Signature:

I certify that to the best of my knowledge and belief, this BEA and all related materials are true, accurate, and complete and that I performed, or was responsible for the performance of, an All Appropriate Inquiry in conformance with the scope and limitations of the All Appropriate Inquiry Rule, 40 CFR 312 or a Phase I Environmental Site Assessment in conformance with the scope and limitations of the ASTM E1527-05 and have provided the sampling and analysis that confirm the property is a facility as defined by Section 20101(1)(r). Any exceptions to, or deletions from, the All Appropriate Inquiry Rule or ASTM E1527-05 are described in Section 1 of the BEA report. I understand that intentionally submitting false information in a BEA is a felony and may result in fines of up to \$25,000 for each violation.

Signature:

Date:

2/2/11

Printed Name: Brian S. Trent, P.E.

Company: Soil and Materials Engineers, Inc.

Mailing Address: 4705 Clyde Park Ave. SW

City: Grand Rapids

State: Michigan

Zip: 49509

Telephone: (616) 406-1756

E-Mail: trent@sme-usa.com

Submitter Signature:

With my signature below, I certify that to the best of my knowledge and belief, this BEA and all related materials are true, accurate, and complete. I understand that intentionally submitting false information in a BEA is a felony and may result in fines of up to \$25,000 for each violation.

Signature:

Printed Name: Adam Smith

Title and Relationship of signatory to submitter: Village Manager

Address: 265 East Chicago Street

Telephone: (517) 849-2104

Date: 2/1/11

City: Jonesville

State: Michigan Zip: 49250

E-Mail: manager@jonesville.org

Contents of BEA Report - Former Klein Tools Property, Jonesville, Michigan

Contents of BEA Report - Former Klein Tools Property,	Jonesville, Michigan	
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e. Discussion of data gaps identified in the AAI or Phase I and how they affect this BEA.	2.1	6
f. Discussion of the sampling completed, including the purpose and methods. If the data was not collected by the submitter or environmental professional, the demonstration that the data are reliable and relevant to define the conditions at the property.	4.0, 4.1, 4.1.1, 4.1.2, 4.1.3, 4.2	8-12
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1. INTRODUCTION

This report presents the results of a BEA of the former Klein Tools property, located at 121 Water Street in the Village of Jonesville, Hillsdale County, Michigan, 49250, hereinafter referred to as the "Property". The approximate Property location is shown on Figure 1 "Property Location Map". Soil and Materials Engineers, Inc. (SME) prepared this BEA report for disclosure to the Michigan Department of Natural Resources and Environment (MDNRE) on behalf of the Village of Jonesville, the Property owner. The Village of Jonesville can be contacted at:

265 East Chicago Street Jonesville, Michigan 49250 Phone: (517) 849 – 2104 Email: manager@jonesville.org

The Village of Jonesville acquired the Property on December 28, 2010. The Village of Jonesville plans to redevelop the Property in the future; however, currently the building on the Property is being leased to a local manufacturer for storage of idle manufacturing machinery and supplies. The anticipated future use is for mixed recreational, commercial and/or industrial use.

SME prepared this BEA report pursuant to Section 20126 of Part 201 of the Natural Resources and Environmental Protection Act (NREPA), Public Act 451 of 1994, as amended (Part 201). This report is intended to meet the requirements of a BEA and was prepared in general accordance with the Administrative Rules for Part 201, effective December 21, 2002, as amended, and the MDNRE "Baseline Environmental Assessment Submittal Form", form EQP 4025 (12/10), including the attached guidance document "Contents of a BEA Report". SME is submitting this BEA to the MDNRE for disclosure in accordance with Section 20126(1)(c)(ii) of Part 201. This BEA was conducted and completed on January 27, 2011.

1.1 Historical Uses and All Appropriate Inquiry Findings

Historical uses of the Property were evaluated through a Phase I Environmental Site Assessment (ESA) completed by SME. SME completed the Phase I ESA report for the Property on December 28, 2010 on behalf of the Village of Jonesville. The SME Phase I ESA is included as Appendix A.

The Property is comprised of four parcels, the main parcel along the St. Joseph River, a small parcel to the north of the main parcel, and two parcels east of Water Street.

As of 1884, the earliest date of readily ascertainable historical records for the main parcel along the St. Joseph River, this parcel was occupied by the Jonesville Woolen Mill building



located on the central portion of the parcel, as well as a restaurant, an engineering business, a steam printing business, and a meat market along Chicago Street. During the commercial/industrial history of this parcel, the following occupied the parcel after 1884: a fire house, hardware store, tin shop, photo shop, shed, ice house, agricultural implements store, wagon shop, bowling alley, paint shop, dwelling, machine shop, laundry cleaning and pressing business, printing business, carpenter shop, auto garage, hardware store, auto repair facility, hay rack factory, auto sales business, and lodge/hall. Vaco Products, a manufacturer of metal hand tools, operated on the Property from 1945 until 1986, when Klein purchased the Property and continued the manufacturing of hand tools until approximately 2008. Since 2008, a local manufacturer has leased the building for storage of idle manufacturing machinery.

As of 1892, the earliest date of readily ascertainable historical records for the northern parcel, this parcel on the west side of Water Street was a creamery. By 1907, the creamery was vacant and was demolished prior to 1913. After 1913, the parcel was occupied by a residence and a Baptist church. In 1972, this parcel is listed in a city directory as storage for Vaco Products and remained as such until sometime between 1984 and 1990.

The earliest date of readily ascertainable historical records for the eastern parcels, the portion of the Property on the east side of Water Street, was 1884. Since 1884, the parcels have been occupied by residences and a hotel. These buildings were demolished between 1968 and 1972 and the parcels were subsequently used as parking areas for the adjacent Vaco Products manufacturing facility.

The current building is heated with natural gas; however, some historical structures on the Property were documented to have used coal for heating. Additional undocumented heating sources may have been used in other historical structures on the Property.

At the time of SME's reconnaissance, the building on the Property was a vacant manufacturing facility which was being leased and used for machinery storage. A vacant lot and gravel driveway was located north of the manufacturing facility, and an asphalt parking lot was located on the east side of Water Street (eastern parcels). The remainder of the Property was paved with asphalt or concrete.

The Phase I ESA revealed no evidence of recognized environmental conditions in connection with the Property, except for the following:

Two previous environmental investigations were conducted on the Property. These
investigations included soil borings and monitoring wells to evaluate some of the
RECs listed below. Investigations by NTH Consultants, Ltd. in 2008 and ERM in
2010 indicated that volatile organic compounds (VOCs), polynuclear aromatic
hydrocarbons (PAHs), and metals were detected at concentrations exceeding
Michigan's Generic Residential and Commercial I Cleanup Criteria. Soil-

concentrations of VOCs, PAHs, and metals exceeded the drinking water protection (DWP) criteria, groundwater surface water interface protection (GSIP) criteria, and/or direct contact criteria (DCC). Groundwater concentrations exceeded the drinking water criteria (DWC).

- The property was historically used for numerous commercial and industrial operations, many of which would have involved the storage and use of hazardous substances, as well as generation of waste materials. Limited information exists regarding hazardous substance use, handling, and disposal as part of these commercial/industrial applications.
- The current manufacturing building contains several areas in which hazardous substances were known to have been used or stored in significant quantities, including an oil drum overflow pit, two coolant catch pits, a trichloroethylene (TCE) vapor polisher area, a black oxide coating area, and several material storage areas. The unknown material handling procedures, significant hazardous substances used, and varying structural conditions of these areas constitute areas in which hazardous substances may have been released to the subsurface.
- A former employee at the Property filed a complaint reports with local and state agencies in 2006. The complaint reported that a former employee had dumped spent trichloroethene (TCE) out the back loading dock door and that during installation of a sewer in this area, workers noted odorous soils in this area. A subsequent Phase II ESA confirmed the presence of TCE in soil and groundwater in this area. The report also indicated that a hole was drilled through the floor of the black oxide area to drain accumulated liquids through the floor and that oil leaked through the floor in the draw furnace area.
- The owner questionnaire indicated the former presence of an on-site septic field or dry well; monitoring wells; underground sumps, lines, basins, or tanks; above ground and underground storage tank(s); and barrel or drum storage areas throughout the current building. Follow-up interviews of the owner's representative and former site manager indicated the specific locations of some of these structures or areas was not known; therefore, the potential exists for subsurface contamination throughout the manufacturing plant for the above noted items to impact soil and/or groundwater.
- A former gas station was located on the northwest corner of Chicago and Water Streets, which is within the footprint of the existing manufacturing building. Limited information is available regarding the soil and/or groundwater conditions in the area of this former gas station.
- Several pole mounted electrical transformers on the west side of the building were documented as formerly containing polychlorinated biphenyls (PCBs).
- An open LUST site and two former manufacturing facilities are located immediately south of the Property. Limited or no information regarding the conditions at these



sites was available. Furthermore, three underground storage tanks are depicted in the Chicago Street right-of-way in historic Sanborn Fire Insurance Maps. If releases from these sources have occurred, impacted groundwater could migrate to the Property.

• The general soil profile from soil borings performed by others indicated that up to eight feet of fill material containing brick, slag, cinders, coal, and other debris exists across the Property. In addition, numerous structures were demolished at the Property since the late 1800's. The nature and extent of backfill material used is undocumented. Fill material of this nature commonly contains hazardous substances such as PAHs and metals.

There were no exceptions to, or deletions from, the All Appropriate Inquiry Rule 40 CFR 312 or ASTM E1527-05 in the conduct of the Phase I ESA. SME identified three data gaps in connection with the Phase I ESA. A chain-of-title search was not completed prior to the Phase I ESA completion, the first known use of the Property was not identified, and a local unit of government official was not interviewed. Several sources of information were used to compile a detailed history of the site; therefore, these data gaps did not impair SME's ability to identify RECs in connection with the Property.

SME identified one limitation in connection with the Phase I ESA. The building floor was substantially covered with machinery and supplies currently being stored in the building, which prevented observations of much of the building's floor. SME performed the site reconnaissance with a Klein staff member knowledgeable of the processes formerly employed and structures currently and formerly present in the building floor; therefore, this limitation did not significantly impair SME's ability to identify RECs in connection with the Property. Further, due to the historic industrial activities and other RECs identified in connection with the Property, it is unlikely that significant additional RECs would have been identified if the building's floor was not covered.

1.2 Basis for BEA

SME performed a Phase II ESA at the Property on December 1 and 2, 2010. Previous subsurface investigation activities were completed by NTH Consultants, Ltd. (NTH) in November 2008 and by Environmental Resources Management (ERM) in May 2010. Data from the NTH Phase II ESA and the Phase II ESA report prepared by ERM are included in Appendices B and C, respectively. Investigation procedures, soil boring logs, and laboratory analytical results from SME's Phase II ESA are included in Appendices C, D, and E, respectively. The results of the investigations identified soil and groundwater contamination at concentrations greater than applicable Part 201 Residential and Commercial I Generic Cleanup



Criteria (Part 201 criteria). Contaminants detected in the soil and/or groundwater at levels exceeding Part 201 criteria included arsenic, chromium, copper, lead, mercury, selenium, silver, zinc, benzene, cis-1,2-dichloroethylene, naphthalene, trichloroethylene, 1,2,4-trimethylbenzene, vinyl chloride, xylenes, acenaphthene, acenaphthylene, benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, dibenzo(a,h)anthracene, fluoranthene, fluorene, indeno(1,2,3-c,d)pyrene, and phenanthrene. Based on these results, the Property is considered a "facility" as defined by Part 201, Section 20101(1)(r), and a BEA was prepared.



2. PROPERTY DESCRIPTION

The Property's is collectively known as 121 Water Street in the Village of Jonesville, Hillsdale County, Michigan, 49250; however, the Property is comprised of four legal parcels, as follows:

- 06-060-001-038 Main plant parcel which contains the factory building (121 Water Street);
- 06-060-001-004 Vacant parcel to the north of a Consumers Energy electrical substation and main plant parcel (no street address);
- 06-060-001-036 Northern parking lot parcel at the southeast corner of Water Street and North Street (no street address);
- 06-060-001-034 Southern parking lot parcel on the east side of Water Street, north of the unnamed alley (no street address).

The legal descriptions and boundary survey drawings for the Property are included in Appendix G of this BEA report.

The Property is located adjacent to the St. Joseph River, north of Chicago Street/US-12, with parcels on both the west and east sides of Water Street. The main parcel is occupied by one industrial building. The building is primarily one story; however a second story office area is located on the northeast portion of the building. The plant building is generally built slab-ongrade with steel and cinder block construction and is serviced by natural gas and electricity and by municipal storm and sanitary sewers and water service. The main floor of the building is approximately 64,100 square feet, with an approximately 4,400 square foot second story office area. The remainder of this parcel is comprised of asphalt or concrete paved driveways. At the time of the conduct of this BEA, the building on the Property was being leased by a local manufacturer for storage of idle machinery and supplies. The Property was most recently known for its use as a manufacturing facility which produced screwdrivers and other hand tools.

The northern parcel of the Property is a vacant lot. The two parcels east of Water Street are asphalt paved parking lots. The surrounding area is comprised of primarily commercial and retail properties to the east, west, and south, and residential properties to the north.

Photographs illustrating observed Property conditions and surrounding areas, taken by SME on November 24, 2010, are included in Appendix B of the SME Phase I ESA report (Appendix A).



3. KNOWN CONTAMINATION

Subsurface contamination was identified through SME's Phase II ESA of the Property in December 2010, as well as a Phase II ESA by NTH in November 2008 and a Phase II Investigation by ERM in May 2010. An overview of these investigations is summarized in the following subsections.

3.1 Phase II ESAs

3.1.1 NTH Phase II ESA – November 2008

NTH conducted a limited Phase II ESA of the Property on November 12, 2008. NTH advanced 13 direct push soil borings (B-1 through B-13) and installed and sampled two (2) temporary monitoring wells at soil borings B-4 and B-9 to evaluate recognized environmental conditions (RECs) identified in a 2008 NTH Phase I ESA for the Property. The approximate locations of the direct push borings are shown on Figure 2 "Property Features and Soil Boring Location Diagram". Details of sampling rationale were not made available to SME; however, data from the NTH Phase II ESA that was provided to SME are included in Appendix B.

3.1.2 ERM Phase II Investigation – May 2010

ERM conducted a limited Phase II ESA of the Property on March 23 and 24, 2010. ERM installed six (6) temporary wells, MW-1S (shallow), MW-1D (deep), and MW-2 through MW5 to assess an area where NTH identified chlorinated volatile organic compounds in soil and groundwater. The soil and groundwater at each location was sampled and analyzed. The approximate locations of the direct push borings are shown on Figure 2 "Property Features and Soil Boring Location Diagram". Results of the Phase II ESA are presented in ERM's Report of Phase II Investigation, dated May 25, 2010, which is included in Appendix C. Refer to the attached report for additional details regarding the ERM Phase II Investigation.

3.1.3 SME Phase II ESA – December 2010

SME conducted a Phase II ESA of the Property on December 1 and 2, 2010. SME advanced 26 direct push soil borings (SB1 through SB26) and installed and sampled 13 temporary monitoring wells in soil boring SB2, SB3, SB5, SB7, SB9, SB12, SB14, SB16, SB18, SB20, SB21, SB23, and SB24 to assess recognized environmental conditions identified in the SME Phase I ESA and to facilitate Property acquisition. The approximate locations of the direct



push borings are shown on Figure 2 "Property Features and Soil Boring Location Diagram". The location and purpose each boring is summarized in the following table.

Boring	Location / Purpose of Boring			
SB1	Northern parcel to assess potential fill material in location of former structures.			
SB2	Northwest Property corner near St. Joseph River to assess potential fill material and			
3.02	potential for migration of contaminants to river.			
SB3	Near St. Joseph River to assess potential fill material and potential for migration of			
505	contaminants to river.			
SB4	Reported "tar pit" area to assess potential petroleum impact and fill material.			
SB5	In manufacturing plant adjacent to oil pit to assess potential pit leakage.			
SB6	In oil-stained room in manufacturing plant to assess potential seepage of oil through			
BB 0	floor and to assess potential fill material under building from former structures.			
SB7	In footprint of historical hay rack factory to assess potential fill material.			
SB8	Adjacent to building and pole-mounted transformer to assess potential fill material			
550	and potential for historic polychlorinated biphenyl (PCB) leakage.			
SB9 and SB10	In manufacturing plant to assess subsurface conditions in machine repair area and			
SD) and SD10	potential fill material in footprint of historical machine shop.			
SB11 - SB13 To assess subsurface conditions near former oil storage area and TCE				
SB14	To assess subsurface conditions between reported TCE dumping area and St. Joseph			
5517	River.			
SB15	Adjacent to a pole-mounted transformer to assess potential for historic PCB leakage.			
SB16	Near St. Joseph River to assess potential fill material and potential for migration of			
3D10	contaminants to river.			
SB17 and SB18	In manufacturing plant adjacent to coolant catch pit to assess potential pit leakage.			
SB19	In manufacturing plant to assess potential fill material from former blacksmith shop,			
5019	wagon shop, and painting shop.			
SB20	Adjacent to black oxide process area to assess potential leakage of containment area.			
SB21	In manufacturing plant to assess former printing shop area and former gas station.			
SB22	In manufacturing plant to assess former photo shop and auto garage.			
SB23	In manufacturing plant to assess subsurface in area of former TCE vapor polisher.			
SB24	Near St. Joseph River to assess potential fill material and potential for migration of			
SD24	contaminants to river.			
SB25 and SB26	Eastern parking lots to assess potential fill material from former residential structures.			

SME selected soil samples based on intervals with visual or olfactory observations of impact (i.e. unnatural staining, odors, presence of debris, etc.) or positive photoionization detector (PID) readings. Alternatively, if none of the above conditions was observed, a near surface soil sample was typically collected from selected borings. Soil samples for laboratory



analysis were not collected from several soil borings based on the rationale discussed in the following table below.

Boring	Rationale for Not Collecting a Soil Sample		
SB4	Target tar-like substance was not encountered in the boring.		
SB6	No visual, olfactory, or PID evidence of impact in the boring.		
SB10	No visual, olfactory, or PID evidence of impact in the boring.		
SB11	Refusal in shallow concrete did not allow for collection of a soil sample.		
SB17	No visual, olfactory, or PID evidence of pit leakage in the boring.		
SB24	No visual, olfactory, or PID evidence of impact in the boring. A groundwater sample was collected in lieu of a soil sample.		

SME submitted a total of 21 soil samples for analysis. In addition, two duplicate soil samples and one methanol blank were submitted for quality assurance and quality control (QA/QC) purposes. The following table provides the analyses requested at each location and the rationale for each soil sample collected.

Boring and Depth	Analytical Parameters	Rationale		
SB1 0'-2'	PAHs, Metals	Fill material containing cinders and slag.		
SB2 0'-2'	PAHs, Metals	Fill material containing cinders and slag.		
SB3 0'-2'	PAHs, Metals	Fill material containing brick, concrete, and slag.		
SB5 0.5'-2.5'	VOCs, PAHs, Metals	Soil at depth coincident with bottom of oil pit.		
SB7 6'-8'	VOCs, PAHs, Metals	Fill material containing brick, glass, cinders, and slag. PID reading of 5 parts per million (ppm).		
SB7 10'-11'	VOCs, PAHs, Metals	PID reading of 12 ppm.		
SB8 0'-2'	VOCs, PCBs	Fill material containing brick, concrete, cinders, and slag. Directly below pole-mounted transformer known to have been historically filled with PCB-containing oil.		
SB9 4.5'-5.5'	PAHs, Metals	Fill material containing cinders and slag.		
SB12 0.25'-2'	VOCs, PAHs	Fill material containing brick, glass, cinders, and slag. PID reading of 2.6 ppm.		
SB13 0.25'-2'	VOCs, PAHs	Fill material containing cinders and slag. PID reading of 19 ppm.		
SB14 0'-2'	VOCs, PAHs, Metals	Fill material containing brick and slag.		
SB15 0'-2'	PCBs	Directly below pole-mounted transformer known to have been historically filled with PCB-containing oil.		
SB16 0'-2'	VOCs, PAHs, Metals	Fill material containing cinders. PID reading of 2 ppm.		
SB18 2'-3'	VOCs, PAHs, Metals	Fill meterial containing aindows and also DID 1: C2		
SB19 0.5'-2.5'	PAHs, Metals	Fill material containing cinders and slag.		

Boring and Depth	Analytical Parameters	Rationale		
SB20 6'-7'	VOCs, PAHs, Metals	Fill material containing cinders and slag. PID reading of 3 ppm.		
SB21 5'-7'	PAHs, Metals	PID reading of 2 ppm.		
SB22 0.5'-2'	VOCs, PAHs, Metals	Immediately below floor slab to assess near surface conditions		
SB23 2.5'-4.5'	VOCs, PAHs, Metals	Fill material containing brick, cinders, and slag.		
SB25 0.25'-2'	VOCs, Arsenic	PID reading of 3 ppm.		
SB26 0.25'-2'	Arsenic	Immediately below asphalt pavement to assess near surface conditions.		

Metals = Arsenic, Chromium, Copper, Lead, Mercury, Selenium, Silver, and Zinc

PAHs = Polynuclear Aromatic Hydrocarbons

VOCs = Volatile Organic Compounds

PCBs = Polychlorinated Biphenyls

SME installed and sampled 13 temporary monitoring wells on the Property. In addition, SME collected a field blank, a trip blank, and a duplicate groundwater sample for QA/QC purposes. The following table provides the analyses requested at each location and the rationale for each groundwater sample collected.

Temporary Well and Screen Interval	Analytical Parameters	Rationale
SB2 13.5'-18.5'		
SB7 6.5'-11.5'	VOCs, PAHs,	To assess groundwater migrating toward the St. Joseph River
SB16 7'-12'	Metals	near the Groundwater-Surface Water Interface (GSI).
SB24 9'-14'		water interface (GBI).
SB3 10'-15'	VOCs, PAHs, Metals, Hexavalent Chromium	To assess groundwater migrating toward the St. Joseph River near the GSI.
SB5 4'-9'	VOCs, PAHs, Metals	To assess groundwater conditions below the oil catch pit.
SB9 4.5'-9.5'	VOCs, PAHs,	To assess groundwater conditions below the machine repair
	Metals	area.
SB12 3'-8'	VOCs, PAHs, Metals	To assess groundwater conditions near the reported TCE dumping area.
SB14 7'-12'	VOCs, PAHs, Metals	To assess groundwater migrating downgradient of the reported TCE dumping area toward the St. Joseph River near the GSI.
SB18 5'-10'	VOCs, PAHs, Metals	To assess groundwater conditions below the coolant catch pit.
SB20 6'-11' VOCs, PAHs, Metals, Hexavalent Chromium		To assess groundwater conditions near the black oxide process containment area.
SB21 5'-10'	VOCs, PAHs, Metals	To assess groundwater conditions downgradient of the former gas station.



Temporary Well and Screen Interval	Analytical Parameters	Rationale			
SB23 6'-11'	VOCs, PAHs, Metals	To assess groundwater conditions near the former TCE vapor polisher area.			

Metals = Arsenic, Chromium, Copper, Lead, Mercury, Selenium, Silver, and Zinc

PAHs = Polynuclear Aromatic Hydrocarbons

VOCs = Volatile Organic Compounds

SME submitted soil and groundwater samples collected for chemical analyses to Fibertec Environmental Services, Inc. in Holt, Michigan. The samples were analyzed by the following United States Environmental Protection Agency (USEPA) analytical methods:

- VOCs USEPA Method 8260B
- PAHs USEPA Method 8270C
- Arsenic, chromium (total), copper, lead, selenium, silver, and zinc) USEPA Method 6020A
- Mercury USEPA Method 7471A
- Hexavalent Chromium USEPA Method7196A
- PCBs USEPA Method 8082A

Laboratory analytical data reports and chain-of-custodies are included in Appendix F. Refer to SME's Phase II ESA Field Procedures in Appendix D for additional details on sampling and QA/QC procedures.

3.2 Subsurface Conditions

Near surface fill materials were encountered in several borings on the Property from the surface or immediately below surface pavement to depths ranging from 2 to 15 feet below grade. The fill was primarily silty sand and gravel with varying amounts of debris including brick, concrete, slag, and cinders. The fill material was underlain by sand with varying amounts of silt and gravel to the terminus of the most borings, which, with few exceptions as indicated on the Soil Boring Logs in Appendix E, ranged from 8 to 16 feet below grade. At soil borings SB2, SB3, SB7, SB12, and SB13, organic silt and/or peat were encountered below the fill and sand layers at depths ranging from 7.5 to 15 feet below grade. The peat layer was penetrated at only one location (SB2). Underlying the peat at this location was silty gravel to a maximum depth explored of 20 feet below grade. Groundwater was encountered at the Property at depths ranging from 3.5 to 15 feet below ground surface. Soil boring SB11 was terminated due to refusal of the drill tooling on a shallow buried concrete slab. Refer to the Direct Push Soil Boring Logs



included in Appendix E for additional details. Stratification lines on the logs indicate a general transition between soil types, and are not intended to show an area of exact geological change.

SME evaluated soil samples in the field for evidence of environmental impact. Soil samples were screened in the field for approximate total concentrations of detectable VOCs using a portable photoionization detector (PID). Field screening results are included on the Direct Push Soil Boring Logs in Appendix E. PID readings over 5 ppm and/or chemical odors were noted at soil borings SB7, SB12, SB13, and SB20.

3.3 Summary of Contamination

Chemical testing results were compared to Part 201 Generic Residential Cleanup Criteria to determine if the site qualifies as a Part 201 "facility." The results for analyses of soil and groundwater samples as part of the SME Phase II ESA are presented on Tables 1 and 2, respectively. The results for analyses of soil and groundwater samples as part of the NTH and ERM investigations are included in Appendices B and C, respectively. The following tables summarize the constituents detected in soil and groundwater at concentrations exceeding Part 201 generic residential cleanup criteria. Data from the SME, NTH, and ERM investigations are included.

Soil Concentrations Exceeding Part 201 Cleanup Criteria

Parameter	CAS No. Part 201 Cas No. Cleanup Criteria Exceeded		Locations and Sample Depths (in feet) Exceeding Part 201 Criteria		Maximum Concentration (μg/kg)	
Benzene	71432	DWP	SB13 0.25-2	SB18 2-3	290	
Cis-1,2-dichloroethylene	156592	DWP	SB13 0.25-2		7,100	
Ethylbenzene	100414	GSIP	B-5 0-2		490	
Naphthalene	91203	GSIP	SB18 2-3		8,500	
Toluene	108883	GSIP	B-5 0-2		0,000	
Trichloroethylene	79016	DWP, GSIP, SVIIC	B-5 0-2 B-6 0-2 SB/MW-1 0-1 SB7 6-8 SB8 0-2	SB12 0.25-2 SB13 0.25-2 SB14 0-2 SB23 2.5-4.5	18,000	
1,2,4-Trimethylbenzene	95636	GSIP	SB13 0.25-2		700	
Vinyl chloride	75014	DWP, GSIP, SVIIC	SB13 0.25-2		400	
Xylenes	1330207	GSIP	B-5 0-2	SB18 2-3	730	
Acenaphthene	83329	GSIP	SB18 2-3		12,000	
Acenaphthylene	208968	DWP	SB18 2-3		9,100	
Benzo(a)anthracene	56553	DCC	SB18 2-3		60,000	
Benzo(a)pyrene	50328	DCC	B-13 0-2 SB7 6-8	SB18 2-3 SB23 2.5-4.5	50,000	

Parameter	CAS No.	Part 201 Generic Cleanup Criteria Exceeded		and Sample Depths (in feet) Part 201 Criteria	Maximum Concentration (μg/kg)
Benzo(b)fluoranthene	205992	DCC	SB18 2-3		65,000
Dibenzo(a,h)anthracene	53703	DCC	SB18 2-3		5,200
Fluoranthene	206440	GSIP	B-13 0-2 SB7 6-8	SB18 2-3	140,000
Fluorene	86737	GSIP	SB18 2-3		16,000
Indeno(1,2,3-c,d)pyrene	193395	DCC	SB18 2-3		21,000
Phenanthrene	85018	DWP, GSIP	B-13 0-2	SB18 2-3	140,000
Arsenic	7440382	DWP, GSIP, DCC	B-1 0-2 B-2 8-10 B-3 12-14 B-4 12-14 B-5 0-2 B-6 0-2 B-8 0-2 B-11 6-8 B-13 0-2 SB1 0-2 SB2 0-2 SB3 0-2	SB5 0.5-2.5 SB7 6-8 SB7 10-11 SB9 4.5-5.5 SB14 0-2 SB16 0-2 SB18 2-3 SB19 0.5-2.5 SB20 6-7 SB21 5-7 SB23 2.5-4.5 SB25 0.25-2	110,000
Chromium	16065831	DWP, GSIP	SB3 0-2 SB7 6-8	SB20 6-7	87,000
Copper	7440508	GSIP	B-3 12-14 B-11 6-8	SB7 6-8 SB20 6-7	550,000
Lead	7439921	DWP, DCC	B-11 6-8 SB7 6-8	SB18 2-3 SB20 6-7	1,700,000
Mercury	7439966	DWP, GSIP	B-3 12-14 B-5 0-2 B-8 0-2 B-11 6-8 B-13 0-2 SB2 0-2	SB3 0-2 SB7 6-8 SB18 2-3 SB19 0.5-2.5 SB20 6-7 SB23 2.5-4.5	5,300
Selenium	7782492	GSIP	B-3 12-14 B-4 12-14 B-11 6-8 SB2 0-2 SB3 0-2 SB5 0.5-2.5 SB7 6-8 SB7 10-11	SB9 4.5-5.5 SB14 0-2 SB18 2-3 SB19 0.5-2.5 SB20 6-7 SB21 5-7 SB23 2.5-4.5	2,000
Silver	7440224	GSIP	B-3 12-14 B-11 6-8	B-13 0-2	3,100
Zinc	7440666	GSIP	B-3 12-14 B-5 0-2 B-9 10-12 B-11 6-8	B-13 0-2 SB7 6-8 SB20 6-7	3,800,000

DWP = Drinking Water Protection Criteria, GSIP = Groundwater Surface Water Interface Protection Criteria, SVIIC = Soil Volatilization to Indoor Air Inhalation Criteria, DCC = Direct Contact Criteria



Groundwater Concentrations Exceeding Part 201 Cleanup Criteria

Parameter	CAS No.	Part 201 Generic Cleanup Criteria Exceeded	(in	Screen Interval feet) rt 201 Criteria	Maximum Concentration (µg/L)
Trichloroethylene	79016	DWC	B-4 10-15 MW-1S 4-9 MW-1D 10-15	MW-3 8-13 MW-5 9-14 SB14 7-12	20
Vinyl chloride	75014	DWC	MW-2 7-12	SB14 7-12	3.1
Fluoranthene	206440	GSI	SB2 13.5-18.5		2.0
Arsenic	7440382	DWC	B-4 10-15 SB2 13.5-18.5	SB7 6.5-11.5	15
Copper	7440508	GSI	SB2 13.5-18.5	SB3 10-15	29
Lead	7439921	DWC, GSI	SB2 13.5-18.5 SB7 6.5-11.5 SB9 4.5-9.5 SB12 3-8	SB16 7-12 SB18 5-10 SB21 5-10	600
Zinc DWC = Drinking Water	7440666	GSI	SB2 13.5-18.5		380

DWC = Drinking Water Criteria, GSI = Groundwater Surface Water Interface Criteria

3.4 Abandoned Containers

No known abandoned aboveground storage tanks (ASTs), underground storage tanks (USTs), or abandoned containers were observed or known to be present on the Property at the time this BEA was conducted.



4. LIKELIHOOD OF OTHER CONTAMINATION

Based on the results of the Phase I ESAs and limited Phase II ESA, SME identified no on-site areas of concern other than those addressed by the assessment activities described herein. The location of the soil borings and the analytical testing program were selected based on known historical uses of the Property and associated Part 201 hazardous substances that would be likely indicators of historic releases, and observations during the limited Phase II ESA investigation. SME cannot guarantee all potential contaminants or the extent of contamination has been identified. Unknown and/or undetected contamination resulting from historical activities or off site sources may be present on the Property.



5. CONCLUSIONS

Based on the results of SME's limited Phase II ESA, in conjunction with previous investigations by NTH and ERM summarized herein, the Property meets the definition of a "facility", as defined by Section 20101 of PA 451, Part 201, as amended, because of the presence of numerous VOCs, PAHs, and metals in soil and trichloroethylene, vinyl chloride, fluoranthene, arsenic, copper, lead, and zinc in groundwater at concentrations greater than the Part 201 Generic Residential Cleanup Criteria.

In the process of obtaining information in preparation of this BEA, procedures were followed that represent current reasonable and accepted engineering and hydrogeological practices and principles, in a manner consistent with the level of care and skill ordinarily exercised by members of these professions.

Based on subsurface, analytical, and historical data which have been collected, this BEA has been prepared to provide a basis to demonstrate the existing facility conditions at the time of purchase by the Village of Jonesville.



6. IDENTIFICATION OF AUTHOR AND ENVIRONMENTAL PROFESSIONAL, DATE BEA WAS CONDUCTED, AND DATE BEA WAS COMPLETED

The Author and Environmental Professional responsible for the conduct of this Baseline Environmental Assessment (BEA) was Mr. Brian S. Trent, P.E. Senior technical review was provided by Mr. Keith Egan, Ohio CP#259. Resumes of Mr. Trent and Mr. Egan are included in Appendix H.

This BEA was conducted on January 27, 2011 and completed on January 27, 2011 in accordance with Section 20126(1)(c)(i) of Part 201.

Contact information for Mr. Brian S. Trent, P.E. is provided below:

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Phone: (616) 406 – 1756

Email: trent@sme-usa.com



7. REFERENCES

- 1. Soil and Materials Engineers, Inc., Phase I Environmental Site Assessment Former Klein Tools Property, 121 Water Street, Jonesville, Michigan, dated December 28, 2010.
- 2. Environmental Resources Management, Report of Phase II Environmental Investigation, Klein Tools, Inc., 121 Water Street, Jonesville, Michigan, dated May 25, 2010.
- 3. NTH Consultants, Ltd., Phase II Environmental Site Assessment Data, Former Klein Tool Property, Jonesville, Michigan, November 2008 data.
- 4. Part 201 of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended, and the Part 9 and Part 10 Rules, dated December 21, 2002.
- 5. Michigan Department of Natural Resources and Environment (MDNRE) Form EQP 4025, Baseline Environmental Assessment Submittal Form Contents of a BEA Report, dated December 2010.
- 6. The MDNRE, Part 201 Generic Residential Cleanup Criteria and Screening Levels presented in the MDNRE RRD's Operational Memorandum No. 1, dated January 23, 2006.



FIGURES

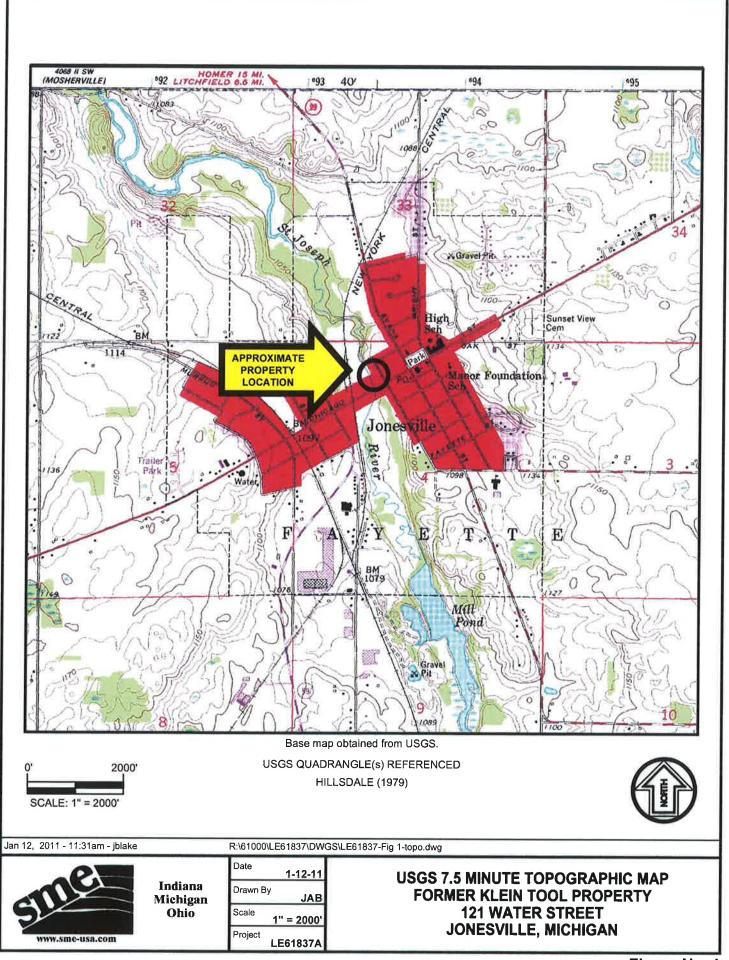
Figure 1: Property Location Map

Figure 2: Property Features and Soil Boring Location Diagram

Figure 3: Part 201 Criteria Exceedance Diagram – Soil

Figure 4: Part 201 Criteria Exceedance Diagram - Groundwater





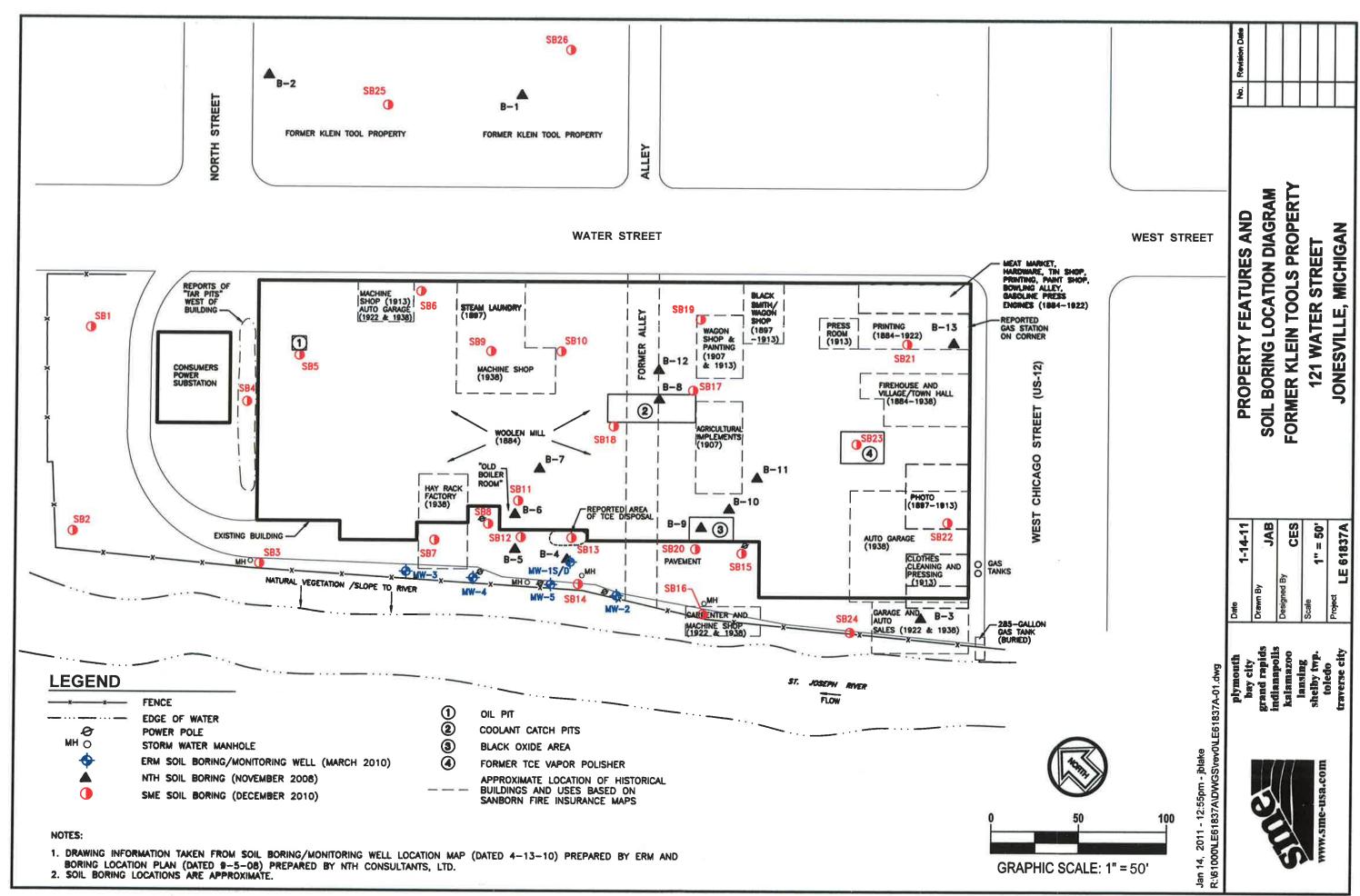
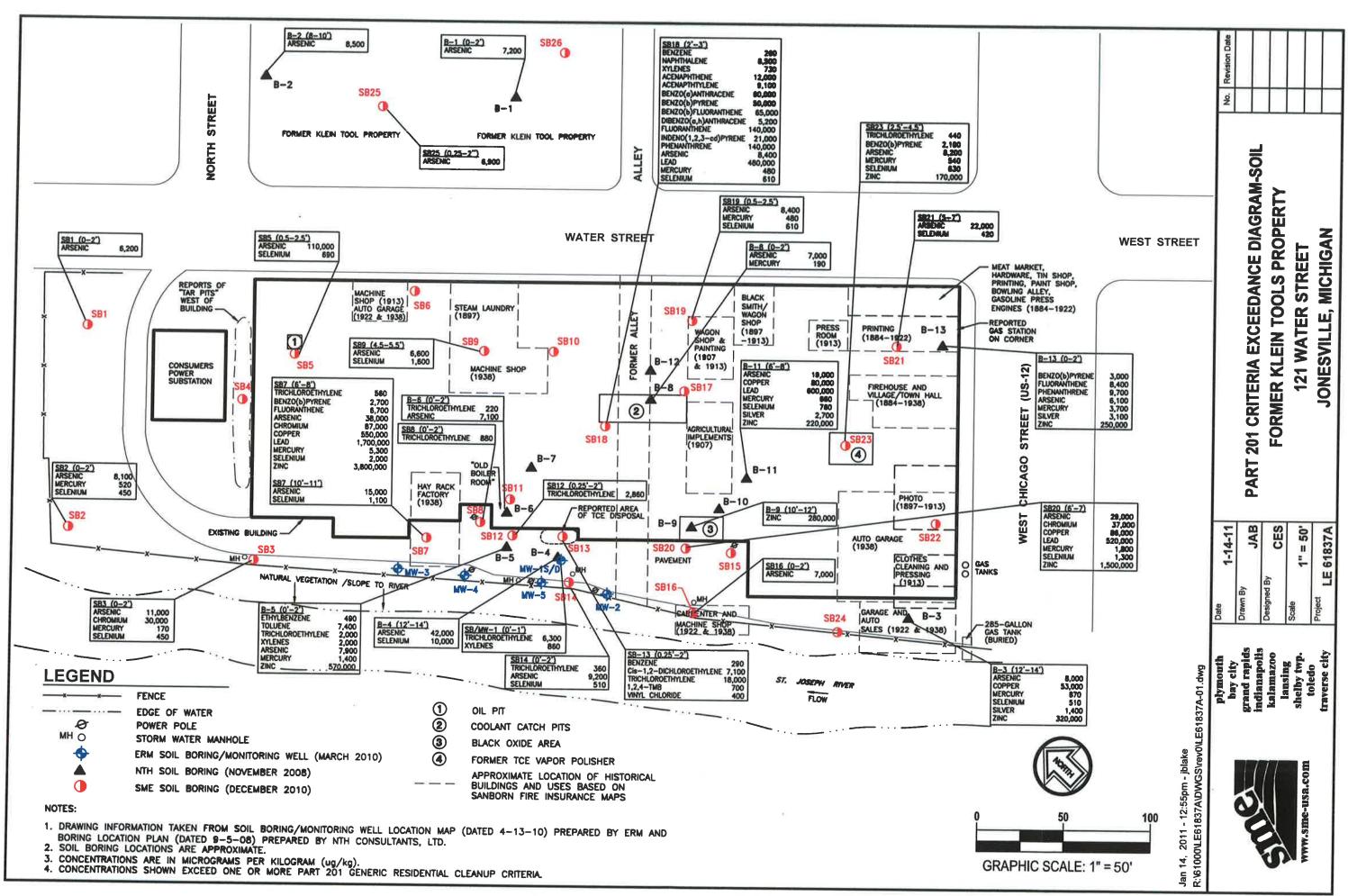


Figure No. 2



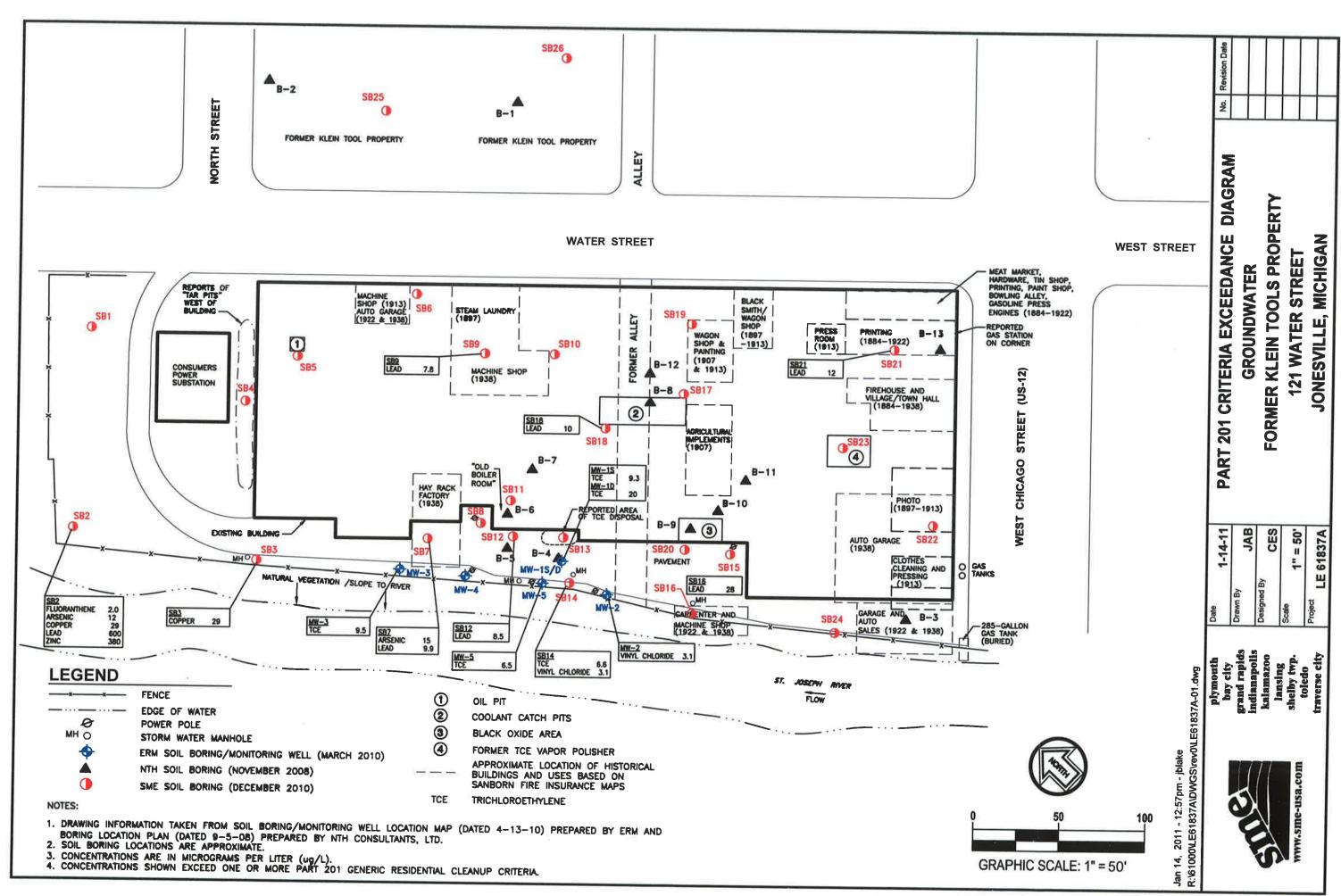


Figure No. 4

TABLES

Table 1: Soil Analytical Results

Table 2: Groundwater Analytical Results



TABLE 1 KLEIN TOOLS PROPERTY JONESVILLE, MICHIGAN SOIL ANALYTICAL RESULTS SME Project No. LE61837A Page 1 of 2

Constituent VOCs (ug/kg)		Delation Water				nup Criteria and Screening L	evels							Depth Belo	ople ID ow Grade (ft.) Collected					
VDCs (nertea)	CAS Number	Protection Criteria	Groundwater Surface Water	Groundwater Contact	Soil Volatilization to Indoor Air	Infinite Source Volatile	Particulate Soil Inhalation	Direct Contact	SB1	SB2	SB3	SB5	DUPI	SB7	SB7	SB8	SB9	SB12	SB13	
VOCs (norter)	i i i i i i i i i i i i i i i i i i i	Criteria	Interface Protection Criteria	Protection	Inhalation	Soll Inhalation Criteria	Criteria	Criteria	0'-2"	0'-2'	0'-2'	0.5'-2.5'	SB5 Duplicate	6'-8'	10'-11'	0'-2'	4.5'-5.5'	0.25'-2'	0.25'-2'	
			Criteria	Criteria	Criteria	 			12/1/2010	12/1/2010	12/1/2010	12/1/2010	12/1/2010	12/1/2010	12/1/2010	12/1/2010	12/1/2010	12/1/2010	12/1/2010	- 0
enzene	71-43-2	100	4,000***	220,000	1 (00													720 312010	12/02/10	-
Butylbenzene	104-51-8	1,600	ID	120,000	1,600 ID	13,000	380,000,000	180,000	#	22		<50	<50	<50	<67	<50		<50	<50	T
s-1,2-Dichloroethylene	156-59-2	1,400	12,000	640,000	22,000	ID	ID	2,500,000				<50	<50	<50	<67	<50		<50	290	1
ms-1,2-Dichloroethylene	156-60-5	2,000	30,000	1,400,000	23,000	180,000	2,300,000,000	640,000				<50	<50	<50	<67	<50		260	7,100	+
thylbenzene	100-41-4	1,500	360	140,000	87,000	280,000	4,700,600,000	1,400,000	166	722		<50	<50	<50	<67	<s0< td=""><td></td><td><50</td><td>280</td><td>1</td></s0<>		<50	280	1
laphthalene	91-20-3	35,000	870	2,100,000	250,000	720,000 300,000	10,000,000,000	140,000	- 4	722	. 4	<50	<50	<50	<67	<50	4	<50	140	1
oluene	108-88-3	16,000	2,800	250,000	250,000		200,000,000	16,000,000	164	722		<330	<330	<330	<330	<330		<330	700	1
richloroethylene	79-01-6	100	4,000***	440,000	7,100	2,800,000	27,000,000,000	250,000	\#	722		<50	<50	<50	<67	61	-	<50	170	+-
2,3-Trimethylbenzene	526-73-8	NA	NA NA	NA NA	NA NA	78,000	1,800,000,000	500,000	194	122		75	190	510	<67	880	244	2,800	18,000	1
2,4-Trimethylbenzene	95-63-6	2,100	570	110,000	110,000	NA 21,000,000	NA.	NA NA	144			<100	<100	<100	<100	<100	344	<100	760	1
3,5-Trimethylbenzene	108-67-8	1,800	1,100	94,000			82,000,000,000	110,000			-	<100	<100	<100	<100	<100	122	<100	700	_
'inyl chloride	75-01-4	40	300	20,000	94,000	16,000,000	82,000,000,000	94,000	244			<100	<100	<100	<100	<100	200	<100	420	1
(ylenes	1330-20-7	5,600	700	150,000	270	4,200	350,000,000	3,800	**			<40	<40	<40	<67	<40	796	<40	400	1
Other Analyzed VOCs	Varies	Varies	Varies	150,000 Varies	150,000 Varies	46,000,000	290,000,000,000	150,000			- 7	<150	<150	<150	<200	<150	199	<150	490	1
PAHs (ug/kg)		111112	Yanto	Varies	Varies	Varies	Varies	Varies	144	**	721	<rl< td=""><td><rl.< td=""><td><rl< td=""><td><rl< td=""><td><rl< td=""><td></td><td><rl< td=""><td><rl< td=""><td>+</td></rl<></td></rl<></td></rl<></td></rl<></td></rl<></td></rl.<></td></rl<>	<rl.< td=""><td><rl< td=""><td><rl< td=""><td><rl< td=""><td></td><td><rl< td=""><td><rl< td=""><td>+</td></rl<></td></rl<></td></rl<></td></rl<></td></rl<></td></rl.<>	<rl< td=""><td><rl< td=""><td><rl< td=""><td></td><td><rl< td=""><td><rl< td=""><td>+</td></rl<></td></rl<></td></rl<></td></rl<></td></rl<>	<rl< td=""><td><rl< td=""><td></td><td><rl< td=""><td><rl< td=""><td>+</td></rl<></td></rl<></td></rl<></td></rl<>	<rl< td=""><td></td><td><rl< td=""><td><rl< td=""><td>+</td></rl<></td></rl<></td></rl<>		<rl< td=""><td><rl< td=""><td>+</td></rl<></td></rl<>	<rl< td=""><td>+</td></rl<>	+
Accnaphthene	83-32-9	300,000	4,400	970,000	100,000,000	01.000														-
cenaphtylene	208-96-8	5,900	1D	440,000	190,000,000	81,000,000	14,000,000,000	41,000,000	<330	<330	<330	<330	<330	<330	<330		<330	<330	940	T
anthracene	120-12-7	41,000	ID ID	41,000	1,600,000	2,200,000	2,300,000,000	1,600,000	<330	<330	<330	<330	<330	460	<330		<330	560	<330	1
enzo(a)anthracene	56-55-3	NLL	NLL	NLL	1,000,000,000	1,400,000,000	67,000,000,000	230,000,000	<330	<330	<330	<330	<330	1,200	440	144	<330	<330	900	+
lenzo(a)pyrene	50-32-8	NLL	NLL	NLL	NLV	NLV	ID	20,000	<330	990	1,100	<330	<330	3,300	1,500		470	970	2,600	+
lenzo(b)fluoranthene	205-99-2	NLL	NLL	NLL.	NLV	NLV	1,500,000	2,000	<330	890	1,100	<330	<330	2,700	1,000		<330	2,000	1,900	+
enzo(g,li,i)perylene	191-24-2	NLL	NLL	NLL	ID	1D	ID	20,000	<330	1,200	1,600	<330	<330	3,300	1,200		430	2,700	3,300	+-
enzo(k)fluoranthene	207-08-9	NLL	NLL.	NLL	NLV	NLV	800,000,000	2,500,000	<330	670	540	<330	<330	2,100	<330		<330	520	<330	+
hrysene	218-01-9	NLL	NLL	NLL	NLV	NLV	ID	200,000	<330	430	540	<330	<330	1,100	550		<330	660	990	+
Dibenzo(a,h)anthracene	53-70-3	NLL	NLL	NLL.	ID	ID	1D	2,000,000	<330	940	1,100	<330	<330	3,200	1,400		540	2,800	4,600	+
luoranthene	206-44-0	750,000	5,500	730,000	NLV	NLV	1D	2,000	<330	<330	<330	<330	<330	630	<330		<330	<330	<330	+
luorene	86-73-7	390,000	5,300	890,000	1,000,000,000 (D)	740,000,000	9,300,000,000	46,000,000	<330	2,100	2,300	<330	<330	6,700	2,600		670	1,600	5,100	+
ndeno(1,2,3-ed)pyrene	193-39-5	NLL	NLL NLL	NLL.	580,000,000	130,000,000	9,300,000,000	27,000,000	<330	<330	<330	<330	<330	430	<330		<330	<330	1,100	+
-Methylnapthalene	91-57-6	57,000	ID	5,500,000	NLV	NLV	ID	20,000	<330	760	690	<330	<330	1,700	<330		<330	770	470	+
aphthalene	91-20-3	35,000	870	2,100,000	ID	ID	1D	8,100,000	<330	<330	<330	<330	<330	<330	<330		1,200	<330	2,500	+
henanthrene	85-01-8	56,000	5,300	1,100,000	250,000	300,000	200,000,000	16,000,000	<330	<330	<330		**				750	-5.70	2,000	-
утеле	129-00-0	480,000	1D	480,000	2,800,000 1,000,000,000 (D)	160,000	6,700,000	1,600,000	<330	1,200	990	<330	<330	4,300	1,400		1,400	<1400	4,200	\vdash
PCBs (ug/kg)		400,000	10	400,000	1,000,000,000 (D)	650,000,000	6,700,000,000	29,000,000	<330	1,800	2,000	<330	<330	5,800	2,300	**	620	3,800	6,400	-
CB ₅	1336-36-3	NLL	NLL	NLL	3,000,000	210.000													0,100	
Metals (ug/kg)		7,110	1100	Nut	3,000,000	240,000	5,200,000	4,000		44	¥4(***		<rl.< td=""><td></td><td>44</td><td>- 1</td><td></td></rl.<>		44	- 1	
rsenic	7440-38-2	5,800^	70,000***	2,000,000	MAN	1000														
hromium, total**	16065-83-1	30,000	18,000*	140,000,000	NLV	NLV	720,000	7,600	6,200	8,100	11,000	110,000	26,000	38,000	15,000		6,600	- D. T		
opper.	7440-50-8	5,800,000	73,000*	1,000,000,000	NLV	NLV	330,000,000	2,500,000	5,500	9,300	30,000	13,000	10,000	87,000	1,900	- ,-	3,400	241		
cad	7439-92-1	700,000	2,500,000*	ID	NLV	NLV	130,000,000	20,000,000	8,900	33,000	61,000	30,000	15,000	550,000	2,100		8,500	-	2	
lercury	7439-96-6	1,700	130	47000	NLV	NLV	100,000,000	:400,000	61,000	290,000	120,000	40,000	20,000	1,700,000	2,800		8,700	-	- 2	
elenium	7782-49-2	4,000	410^	78,000,000	48,000	52,000	20,000,000	160,000	130	520	170	54	56	5,300	95		94		2	
	7440-22-4	4,500	1,000^	200,000,000	NLV	NLV	130,000,000	2,600,000	360	450	450	690	650	2,000	1,100		1,600		- 2	
lver	7440-66-6	2,400,000	170,000*	1,000,000,000	NLV	NLV	6,700,000	2,500,000	<100	220	110	<100	<100	820	<100		<100			
	7440-00-0	2,400,000	170,000		NLV	NLV	ID	170,000,000	91,000	150,000	150,000	120,000		3,800,000			>1.00			-

TABLE 1 KLEIN TOOLS PROPERTY JONESVILLE, MICHIGAN SOIL ANALYTICAL RESULTS SME Project No. LE61837A Page 2 of 2

		Part 201 Soil Generic Residential and Commercial I Cleanup Criteria and Screening Levels Drinking Water Groundwater Groundwater Soil Voluntification					evels		Sample ID Depth Below Grade (ft.) Date Collected										
Constituent	CAS Number	Protection Criteria	Surface Water Interface Protection Criteria	Contact Protection	Soil Volatilization to Indoor Air Inhalation	Infinite Source Volatile Soil Inhalation Criteria	Particulate Soil Inhalation Criteria	Direct Contact Criteria	SB15 0'-2'	SB16 0'+2'	SB18	SB19	SB20	SB21	SB22	SB23	SB25	DUP3	T
VOCs (ug/kg)			Criteria	Criteria	Criteria			, salar	12/1/2010	12/1/2010	2'-3'	0.5'-2.5'	6'-7'	5'-7'	0.5'-2'	2.5'-4.5'	0.25'-2'	SB25 Duplicate	0 = 1
zene	71-43-2	100	4,000***	220,000	1.700						1222010	1 12/2/2010	12/1/2010	12/2/2010	12/2/2010	12/2/2010	12/2/2010	12/2/2010	
utylbenzene	104-51-8	1,600	ID	120,000	1,600	13,000	380,000,000	180,000	-	<50	260		<50						
1,2-Dichloroethylene	156-59-2	1,400	12,000	640,000	ID 22,000	ID ID	ID	2,500,000	-	<50	<50		<50		<50	<50	<50	<50	
s-1,2-Dichloroethylene /Ibenzene	156-60-5	2,000	30,000	1,400,000	23,000	180,000	2,300,000,000	640,000	-	<50	<50		<50		<50	<50	<50	<50	
hthalene	100-41-4	1,500	360	140,000	87,000	280,000	4,700,000,000	1,400,000	-	<50	<50		<50	-	<50	<50	<50	<50	
ntmiene	91-20-3	35,000	870	2,100,000	250,000	720,000	10,000,000,000	140,000	-	<50	69	-	<50		<50	<50	<50	<50	
hloroethylene	108-88-3	16,000	2,800	250,000	250,000	300,000	200,000,000	16,000,000	-	<330	8,500	742	<330		<50	<50	<50	<50	
3-Trimethylbenzene	79-01-6	100	4,000***	440,000	7,100	2,800,000	27,000,000,000	250,000		<50	690	<u></u>	<50		<330	<330	<330	<330	
4-Trimethylbenzene	526-73-8	. NA	NA	NA	NA NA	78,000 NA	1,800,000,000	500,000		<50	60		<50	-	<50 <50	<50	<50	<50	\perp
-Trimethylbenzene	95-63-6	2,100	570	110,000	110,000	21,000,000	NA NA	NA NA	-	<100	<100		<100		<100	440	<50	<50	
1 chloride	108-67-8	1,800	1,100	94,000	94,000	16,000,000	82,000,000,000	110,000	-	<100	260	-	<100		<100	<100	<100	<100	-
nes	75-01-4	40	300	20,000	270	4,200	82,000,000,000	94,000		<100	<100	-	<100		<100	<100	<100	<100	
r Analyzed VOCs	1330-20-7	5,600	700	150,000	150,000	46,000,000	350,000,000	3,800		<40	<40		<40		<40	<100	<100	<100	-
PAHs (ug/kg)	Varies	Varies	Varies	Varies	Varies	40,000,000 Varies	290,000,000,000 Varies	150,000	20	<150	730	-	<150	_	<150	<40 <150	<40	<40	1
aphthene	83.33.0					711103	varies	Varies	**	<rl< td=""><td><rl.< td=""><td>2441</td><td><rl< td=""><td>122</td><td><rl< td=""><td><150 <rl< td=""><td><150</td><td><150</td><td>-</td></rl<></td></rl<></td></rl<></td></rl.<></td></rl<>	<rl.< td=""><td>2441</td><td><rl< td=""><td>122</td><td><rl< td=""><td><150 <rl< td=""><td><150</td><td><150</td><td>-</td></rl<></td></rl<></td></rl<></td></rl.<>	2441	<rl< td=""><td>122</td><td><rl< td=""><td><150 <rl< td=""><td><150</td><td><150</td><td>-</td></rl<></td></rl<></td></rl<>	122	<rl< td=""><td><150 <rl< td=""><td><150</td><td><150</td><td>-</td></rl<></td></rl<>	<150 <rl< td=""><td><150</td><td><150</td><td>-</td></rl<>	<150	<150	-
aphtylene	83-32-9 208-96-8	300,000	4,400	970,000	190,000,000	81,000,000	14,000,000,000	11 000 000								-RL	<rl.< td=""><td><rl.< td=""><td>1</td></rl.<></td></rl.<>	<rl.< td=""><td>1</td></rl.<>	1
racene		5,900	ID	440,000	1,600,000	2,200,000	2,300,000,000	41,000,000		<330	12,000	<330	630	<330	<330	<330			_
o(a)anthracene	120-12-7 56-55-3	41,000	1D	41,000	1,000,000,000	1,400,000,000	67,000,000,000	1,600,000		<330	9,100	340	<330	<330	<330	680			-
p(a)pyrene	50-32-8	NLL	NLL	NLL	NLV	NLV	ID	230,000,000		<330	35,000	1,000	<330	<330	<330	580	-	-	-
p(b)fluoranthene	205-99-2	NLL	NLL	NLL	NLV	NLV	1,500,000	20,000		<330	60,000	2,400	400	<330	<330	2,000	-		-
Xg,h,i)perylene	191-24-2	NLL	NLL	NLL	ID	ID	ID	2,000		<330	50,000	1,800	<330	<330	<330	2,100			\vdash
(k)fluoranthene	207-08-9	NLL	NLL	NLL	NLV	NLV	800,000,000	2,500,000	-	<330	65,000	2,300	360	<330	<330	3,200	-		\vdash
ene	218-01-9	NLL	NLL	NLL	NLV	NLV	ID	200,000		<330	14,000	960	<330	<330	<330	1,100	_ :		\vdash
zo(a,h)anthracene	53-70-3	NLL NLL	NLL	NLL	ID	ID.	ID	2,000,000		<330	24,000	798	<330	<330	<330	1,100	-	-	
anthene	206-44-0	750,000	NLL.	NLL	NLV	NLV	ID	2.000		<330	54,000	2,100	<330	<330	<330	2,100			
nic	86-73-7	390,000	5,500	730,000	1,000,000,000 (D)	740,000,000	9,300,000,000	46,000,000		<330	5,200	<330	<330	<330	<330	<330	140		
(1,2,3-cd)pyrene	193-39-5	NLL	5,300 NLL	890,000	580,000,000	130,000,000	9,300,000,000	27,000,000		<330 <330	140,000	4,600	780	<330	400	4,500	-		
hylnapthalene	91-57-6	57,000	ID ID	NLL	NLV	NLV	ID	20,000	-	<330	16,000	<330	600	<330	<330	<330			
halene	91-20-3	35,000	870	5,500,000	ID	ID	ID	8,100,000	-	<330	21,000	1,200	<330	<330	<330	1,400			-
nthrene	85-01-8	56,000	5,300	2,100,000	250,000	300,000	200,000,000	16,000,000		<330	8,600	<330	<330	<330	<330	<330			
	129-00-0	480,000	ID	1,100,000	2,800,000	160,000	6,700,000	1,600,000		<330	140.000	<330		<330	**		***		
PCBs (ug/kg)			10	480,000	1,000,000,000 (D)	650,000,000	6,700,000,000	29,000,000		<330	140,000	3,900	1,300	<330	<330	3,200			
	1336-36-3	NLL	NLL	NLL.						550	120,000	4,000	610	<330	350	3,900	-	-	_
Metals (ug/kg)			NEL	NLL.	3,000,000	240,000	5,200,000	4,000	<rl t<="" td=""><td>- T</td><td>- T</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td></rl>	- T	- T								
5	7440-38-2	5,800^	70,000***	2,000,000											+-	**		(44)	
ium, total**	16065-83-1	30,000	18,000	140,000,000	NLV	NLV	720,000	7,600	2	7,000	8,400	C700							
	7440-50-8	5,800,000	73.000*	1,000,000,000	NLV	NLV	330,000,000	2,500,000		7,800	13,000	6,600 8,000	29,000	22,000	4,400	8,200	6,900	28,000	
	7439-92-1	700,000	2,500,000*		NLV	NLV	130,000,000	20,000,000		16,000	16,000		37,000	5,500	4,700	9,300		-	
У	7439-96-6	1,700			9701.35		100,000,000	400,000					Control Control			25,000			
m.	7782-49-2	4,000						160,000		74									
	7440-22-4	4,500						2,600,000								540			
	7440-66-6	2,400,000	170,000*					2,500,000		<100								**	
				1,000,000,000	NLv	NLV	ID	170,000,000		59,000						210			
s = Volatile Organic Compounds; PAHs = Ecutrations reported in micrograms per kilogrighted and bolded concentrations exceed the adlector that the associated parameters were in taken from RRD Operational Memorand Criterion not available. Analytical result was less than the respective sufficient data to develop criterion. Chemical is not likely to volatilize data to develop criterion. Chemical is not likely to volatilize data to develop criterion. The compound of the comp	7782-49-2 7440-22-4 7440-66-6 Polynuclear Aromatic Hydroca ram (ug/kg). most restrictive applicable Pa not analyzed for that sample. um #1, Table 2. Soil: Resident ve reporting limit. criterion because it was greate on depends on the water hardn	1,700 4,000 4,500 2,400,000 rbons rt 201 cleanup criteria and sial and Commercial I Part 20	130^ 410^ 1,000^ 170,000* creening levels, where available of Generic Cleanup Criteria and	nd Screening levels, dated J		NLV 52,000 NLV NLV NLV NLV NLV NLV NLV	20,000,000 130,000,000 6,700,000 ID	160,000 2,600,000 2,500,000 170,000,000	**	140,000 74 390 <100	480,000 480 610 130 82,000	19,000 320,000 520 660 240 140,000	86,000 520,000 1,800 1,300 290 1,500,000	16,000 7,800 <50 429 <100 37,000	7,900 29,000 67 200 <100 29,000	330,000 540 630	-		

TABLE 2 KLEIN TOOLS PROPERTY JONESVILLE, MICHIGAN GROUNDWATER ANALYTICAL RESULTS SME Project No. LE61837A Page 1 of 1

		Part 201 Groundwa	ater Generic Residential and Co	ommercial I Cleanup Criteria a	Sample ID Screen Interval (ft.) Date Collected								
Constituent	CAS Number	Drinking Water Criteria	Groundwater Surface Water Interface Criteria	Groundwater Volatilization to Indoor Air Inhalation Criteria	Groundwater Contact Criteria	SB2 13.5'-18.5' 12/2/2010	SB3 10'-15' 12/2/2010	SB5 4'-9' 12/2/2010	DUP2 SB5 Duplicate 12/2/2010	SB7 6.5'-11.5' 12/2/2010	SB9 4.5'-9.5' 12/2/2010	SB12 3'-8' 12/2/2010	
VOCs (ug/L)										12/2/2010	1222010	12/2/2010	
1,1-Dichloroethane	75343	880	740	1,000,000									
cis-1,2-Dichloroethylene	156592	70	620	1,000,000	2,400,000	<1.0	<1,0	<1.0	<1.0	1.1	<1.0	<1.0	
Frichloroethylene	79016	5	200***	93,000	200,000	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	
Vinyl chloride	75014	2	15	15,000	22,000	<1.0	<1.0	1.1	1.1	1.8	<1.0	<1.0 1.4	
Other Analyzed VOCs	Varies	Varies	Varies	1,100	1,000	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0		
PAHs (ug/L)		127,00	Varies	Varies	Varies	<rl< td=""><td><rl< td=""><td><rl< td=""><td><rl< td=""><td><rl< td=""><td><rl< td=""><td><1.0 <rl< td=""></rl<></td></rl<></td></rl<></td></rl<></td></rl<></td></rl<></td></rl<>	<rl< td=""><td><rl< td=""><td><rl< td=""><td><rl< td=""><td><rl< td=""><td><1.0 <rl< td=""></rl<></td></rl<></td></rl<></td></rl<></td></rl<></td></rl<>	<rl< td=""><td><rl< td=""><td><rl< td=""><td><rl< td=""><td><1.0 <rl< td=""></rl<></td></rl<></td></rl<></td></rl<></td></rl<>	<rl< td=""><td><rl< td=""><td><rl< td=""><td><1.0 <rl< td=""></rl<></td></rl<></td></rl<></td></rl<>	<rl< td=""><td><rl< td=""><td><1.0 <rl< td=""></rl<></td></rl<></td></rl<>	<rl< td=""><td><1.0 <rl< td=""></rl<></td></rl<>	<1.0 <rl< td=""></rl<>	
luoranthene	206440	210	1,6								-ACE	-KL	
Other Analyzed PAHs	Varies	Varies		210	210	2.0	<1.0	<1.0	<1.0	<1.0	<1.0	- 43	
Total Metals (ug/L)		Varies	Varies	Varies	Varies	<rl< td=""><td><rl< td=""><td><rl< td=""><td><rl< td=""><td><rl< td=""><td><rl< td=""><td><1.0</td></rl<></td></rl<></td></rl<></td></rl<></td></rl<></td></rl<>	<rl< td=""><td><rl< td=""><td><rl< td=""><td><rl< td=""><td><rl< td=""><td><1.0</td></rl<></td></rl<></td></rl<></td></rl<></td></rl<>	<rl< td=""><td><rl< td=""><td><rl< td=""><td><rl< td=""><td><1.0</td></rl<></td></rl<></td></rl<></td></rl<>	<rl< td=""><td><rl< td=""><td><rl< td=""><td><1.0</td></rl<></td></rl<></td></rl<>	<rl< td=""><td><rl< td=""><td><1.0</td></rl<></td></rl<>	<rl< td=""><td><1.0</td></rl<>	<1.0	
Arsenic	7440382	10	150444						133	-105	\KL	<rl< td=""></rl<>	
Chromium, total **	7440473	100	150***	NLV	4,300	12	<5.0	<5.0	<5.0	15	-5.0		
hromium, hexavalent	18540299	100	100*	NLV	290,000,000	<10	<10	<10	<10	<10	<5.0	7.2	
opper	7440508	1,000	11	NLV	460,000	** :	<5.0				<10	<10	
ead	7439921	4	14*	NLV	7,400,000	29	32	<4.0	<4.0	<4.0	7.9		
Mercury	7439976	2		NLV	ID	600	29	<3.0	<3.0	9.9	7.8	<4.0	
elenium	7782492	50	0.0013	56	56	< 0.20	<0,20	<0.20	<0.20	<0.20	<0.20	8.5	
ilver	7440224	34	0.2	NLV	970,000	<5.0	<5.0	<5.0	<5.0	<5.0	<0.20	<0.20	
inc	7440666	2,400	170*	NLV	1,500,000	< 0.20	<0.20	<0.20	<0.20	<0.20	<0.20	<5.0	
	1000	2,100	170*	NLV	110,000,000	380	120	<50	<50	62	<50	< 0.20	

		Part 201 Groundwa	ater Generic Residential and Co	ommercial I Cleanup Criteria a	Sample ID Screen Interval (ft.) Date Collected								
Constituent	CAS Number	Drinking Water Criteria	Groundwater Surface Water Interface Criteria	Groundwater Volatilization to Indoor Air Inhalation Criteria	Groundwater Contact Criteria	SB14 7'-12' 12/2/2010	SB16 7'-12' 12/2/2010	SB18 5'-10' 12/2/2010	SB20 6'-11' 12/2/2010	SB21 5'-10' 12/2/2010	SB23 6'-11' 12/2/2010	SB24 9'-14' 12/2/2010	
VOCs (ug/L)											12/2/2010	12/2/2010	
1,1-Dichloroethane	75343	880	740	1.000.000									
cis-1,2-Dichloroethylene	156592	70	620	1,000,000	2,400,000	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	
Trichloroethylene	79016	5	200***	93,000	200,000	5,5	<1.0	<1.0	<1.0	<1.0.	<1,0	<1.0	
/inyl chloride	75014	2	15	15,000	22,000	6.6	1.9	<1.0	<1.0	<1.0	<1.0	1.2	
Other Analyzed VOCs	Varies	Varies	Varies	1,100	1,000	2.2	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	
PAHs (ug/L)		Turies	varies	Varies	Varies	<rl< td=""><td><rl.< td=""><td><rl< td=""><td><rl< td=""><td><rl< td=""><td><rl< td=""><td><1.0</td></rl<></td></rl<></td></rl<></td></rl<></td></rl.<></td></rl<>	<rl.< td=""><td><rl< td=""><td><rl< td=""><td><rl< td=""><td><rl< td=""><td><1.0</td></rl<></td></rl<></td></rl<></td></rl<></td></rl.<>	<rl< td=""><td><rl< td=""><td><rl< td=""><td><rl< td=""><td><1.0</td></rl<></td></rl<></td></rl<></td></rl<>	<rl< td=""><td><rl< td=""><td><rl< td=""><td><1.0</td></rl<></td></rl<></td></rl<>	<rl< td=""><td><rl< td=""><td><1.0</td></rl<></td></rl<>	<rl< td=""><td><1.0</td></rl<>	<1.0	
luoranthene	206440	210	16							765	- ALL	<rl< td=""></rl<>	
Other Analyzed PAHs	Varies	Varies	1.6	210	210	<1.0	<1.0	<1.0	<1.0	<1.2	-10		
Total Metals (ug/L)	Varies	Varies	Varies	Varies	Varies	<rl< td=""><td><rl< td=""><td><rl< td=""><td><rl< td=""><td><rl< td=""><td><1.0 <rl< td=""><td><1.0</td></rl<></td></rl<></td></rl<></td></rl<></td></rl<></td></rl<>	<rl< td=""><td><rl< td=""><td><rl< td=""><td><rl< td=""><td><1.0 <rl< td=""><td><1.0</td></rl<></td></rl<></td></rl<></td></rl<></td></rl<>	<rl< td=""><td><rl< td=""><td><rl< td=""><td><1.0 <rl< td=""><td><1.0</td></rl<></td></rl<></td></rl<></td></rl<>	<rl< td=""><td><rl< td=""><td><1.0 <rl< td=""><td><1.0</td></rl<></td></rl<></td></rl<>	<rl< td=""><td><1.0 <rl< td=""><td><1.0</td></rl<></td></rl<>	<1.0 <rl< td=""><td><1.0</td></rl<>	<1.0	
Arsenic	7440382	10	150444						100	-IC	· KL	<rl< td=""></rl<>	
hromium, total **	7440473	100	150***	NLV	4,300	5.3	<5.0	<5.0	<5.0	5,3	-6.0		
hromium, hexavalent	18540299	100	100*	NLV	290,000,000	<10	<10	<10	<10	<10	<5,0	<5.0	
Opper	7440508	1,000	11	NLV	460,000	***	**		<5.0	- 10	<10	<10	
ead	7439921	4	13*	NLV	7,400,000	<4.0	<4.0	<4.0	<4.0	10	-4.0	**	
fercury	7439976	2	14*	NLV	ID	<3.0	28	10	<3.0	17	<4.0	<4.0	
elenium	7782492	50	0.0013	56	56	< 0.20	<0.20	<0.20	<0.20	<0.20	<3.0	<3.0	
ilver	7440224	34	5	NLV	970,000	<5.0	<5.0	<5.0	<5.0	<5.0	<0.20	<0.20	
inc	7440666	2,400	0.2	NLV	1,500,000	<0.20	<0.20	<0.20	<0.20	<0.20	<5.0	<5.0	
00)	7173000	2,400	170*	NLV	110,000,000	<50	<50	<50	<50	<0.20	<0.20 <50	< 0.20	

- Notes:

 1. VOCs= Volatile Organic Compounds; PAHs = Polynuclear Aromatic Hydrocarbons.

 2. Concentrations reported in micrograms per liter (ug/L).

 3. Highlighted and bolded concentrations exceed most restrictive applicable Part 201 cleanup criteria and screening levels, where available.

- 3. Highlighted and bolded concentrations exceed most restrictive applicable Part 201 cleanup criteria and screening levels, where available.
 4. indicates that the associated parameters were not analyzed for that sample.
 5. Criteria taken from RRD Operational Memorandum #1, Table 1. Groundwater: Residential and Industrial-Commercial Part 201 Generic Cleanup Criteria and Screening levels, dated January 23, 2006.
 6. Target analyte concentrations were compared to Part 201 Flammability and Explosivity Screening Levels and Acute Inhalation Screening Levels, which were not shown on this table because there were no exceedances.
 7. <RL Analytical result was less than the respective reporting limit.

- 8. ID Insufficient data to develop criterion.
 9. NLV Hazardous substance is not likely to volatilize under most conditions.
 10. * Groundwater Surface Water Interface Criterion depends on the water hardness of the receiving water. In accordance with MDNRE Operational Memo No. 5, a water hardness of 150 mg CaCO3/L was used for the waters of the southern lower peninsula of Michigan. The criteria are protective for surface water that is used as a drinking water source.
 11. ** Total Chromium value is compared to the Chromium III criteria because Hexavalent chromium was analyzed at two groundwater sample locations at the site and was not detected in either sample.
 12. *** Criterion is not protective of surface water that is used as a drinking water source.