



Environmental & Engineering Services Nationwide



## DOCUMENTATION OF DUE CARE COMPLIANCE

### Commercial Property

395 North Mason Street | Mason, Michigan  
PM Project Number R242.10061.000.0003

*Prepared for:*

### Caledonia Farmers Elevator

240 S. Maple Street  
Caledonia, Michigan 49316

*Prepared by:*

**PM Environmental, a Pinchin Company**  
3340 Ranger Road  
Lansing, Michigan 48906

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## Michigan Locations

September 9, 2024

Mr. Bryan DeRuiter  
Caledonia Farmers Elevator  
240 S. Maple Street  
Caledonia, Michigan 49316

**RE: Documentation of Due Care Compliance for the Commercial Property  
Located at 395 North Mason Street, Mason, Michigan  
Parcel IDs: 33-19-10-05-452-004  
PM Environmental, Inc. Project No. R242.10061.000.0003**

Dear Mr. DeRuiter:

Enclosed is a copy of the Documentation of Due Care Compliance prepared in accordance with Rule 1003(5) of Section 20107(a) of P.A. 451, as amended by PM Environmental, Inc. (PM).

If you have any questions regarding the information in this report, please contact us at 800-313-2966.

Sincerely,  
**PM Environmental, A Pinchin Company**



Aaron Snow  
Project Scientist

Andrea Galli

**Andrea Galli**  
National Manager – Site Investigation Services

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## **1.0 INTRODUCTION**

This Documentation of Due Care Compliance (DDCC) was prepared on behalf of Caledonia Farmers Elevator for the commercial property (Parcel ID: 33-19-10-05-452-004) located at 395 North Mason Street, Mason, Ingham County, Michigan (hereafter referred to as the “subject property”; Figure 1), in accordance with Rule 1003(5) of Section 20107a of Part 201 of the Natural Resources and Environmental Protection Act (NREPA), P.A. 451 of 1994 (Part 201), as amended. The Part 10 Rules require that documentation be maintained demonstrating that the owner or operator of contaminated property is in compliance with Section 7a of Part 201. Documentation of an owner's or operator's compliance with their Section 7a obligations must be made available to the Michigan Department of Environment, Great Lakes, and Energy (EGLE) upon request.

Section 7a of Part 201 imposes “due care” obligations on owners and operators of contaminated properties that are generally described as 1) prevent exacerbation; 2) mitigate unacceptable exposure and operate in a manner that protects the public health and safety; 3) take reasonable precautions against third party omissions; 4) reasonably cooperate with parties authorized to conduct response activities; 5) comply with land or resource use restrictions; and, 6) not impede any land or resource use restrictions.

This report is representative of the current and intended use as outlined in Section 1.1 and 1.2. If changes to the property use, zoning, operations, and/or layout occur, re-evaluation of potential exposure pathways and associated amendments to this report may be required.

### **1.1 Site Description and Background**

The subject property consists of one parcel totaling 0.60 acres and is located on the west side of North Mason Street, north of North Street (Figure 1). The property is developed with one 1,320 square foot warehouse building, with a partially covered bulk chemical storage area (Figure 2). The remainder of the property consists of gravel and groomed grass areas. The property is currently utilized for bulk fertilizer, fuel, herbicide, and pesticide storage and distribution.

Standard and other historical sources documented that the subject property was initially developed in at least 1938, with unknown operations. Three aboveground storage tanks (ASTs), which likely held liquid fertilizers, were installed in the northern portion of the property sometime between 1938 and 1950 and were removed during the 1990s. The current building was constructed in 1975 with a partially covered bulk chemical storage area constructed to the south during the 1990s. The property has been occupied by a bulk petroleum and/or bulk fertilizer, pesticide, fuel, and herbicide operation since at least 1950 and potentially since at least 1938.

### **1.2 Intended Use of the Subject Property**

Caledonia Farmers Elevator intends to sell the property at auction on October 29, 2024.

The subject property is currently zoned M-1: Light Manufacturing. The zoning is consistent with a Nonresidential property use in accordance with Part 201.

Municipal water and sewer, natural gas, electrical, and telecommunications utilities are available to the subject property. The property is not currently connected to public utilities; however, these services are available for future developments, and no water wells or private septic systems are present onsite.

### **1.3 Summary of Previous Site Investigations**

PM reviewed the following previous environmental reports completed for the subject property.

Name of Report	Date of Report	Company that Prepared Report
Phase I Environmental Site Assessment (ESA)	1997	Engineering & Testing Services, Inc. (ETS)
Limited Phase II ESA	1997	
Phase I ESA	December 16, 2015	
Baseline Environmental Assessment (BEA)	January 8, 2016	PM

PM reviewed a Phase I ESA completed in 1997 by ETS for the Mason Elevator Property, which included the subject property. At the time of the Phase I ESA, the subject property was occupied by the current operations. ETS documented similar historical information as included in PM's December 2015 Phase I ESA (Refer to Section 1.4.1). The historical bulk petroleum storage operations were identified as a recognized environmental condition (REC).

As a result of the Phase I ESA, a Limited Phase II ESA was performed in 1997 to assess the former UST area. A map depicting the locations of the soil samples and location of the former underground storage tank (UST) basin was not provided. However, the text indicates three soil samples were collected from the former UST basin and were analyzed for benzene, toluene, ethylbenzene, and xylene (collectively known as BTEX), and polynuclear aromatic hydrocarbons (PNAs). The analytical results provided were below laboratory method detection limits (MDLs) for BTEX and most PNAs. Concentrations of phenanthrene, fluoranthene, and pyrene were detected in one of the soil samples above laboratory MDLs, but below the most restrictive Part 201 Generic Cleanup Criteria (GCC). Due to the limited scope of the 1997 Limited Phase II ESA, the bulk fertilizer, herbicide, and pesticide storage was not assessed at that time.

#### **2015 Phase I ESA**

PM performed a Phase I ESA for the subject property dated December 16, 2015, in conformance with the scope and limitations of ASTM Practice E 1527-13 (i.e., the 'ASTM Standard').

The following onsite RECs were identified in PM's December 16, 2015 Phase I ESA:

- The subject property has been occupied by a bulk petroleum and/or bulk pesticide and herbicide operations since at least 1950 and potentially since at least 1938. The subject property has been utilized for bulk storage and mixing of agricultural chemicals, including pesticides, herbicides, fertilizers, etc., since at least 1950. Additionally, bulk storage of diesel and/or gasoline is also present. The bulk chemical storage has historically occurred in the northern and central portions of the subject property. A floor drain was observed in the southeastern portion of the covered bulk chemical storage area. The floor drain has no outlet; therefore, likely discharges to the ground surface. Based on the long time period of operations, the potential exists for a release to have occurred and for subsurface contamination to be present.
- The subject property formerly contained four USTs, the locations of which are unknown. The USTs were installed in 1981 and were removed in 1988. Based on the

long time period of bulk chemical storage operations and the known historical use of USTs, the potential exists for additional USTs to have been historically present. The potential exists for orphan USTs to be present on the property and/or for a release to have occurred.

The following adjoining and/or nearby RECs were identified:

- The east adjoining property, identified as 340 North Street, has been occupied by a bulk chemical company (Americhem), with bulk chemical storage throughout the property, since at least the 1950s. Review of EGLE records documents at least 18 USTs were formerly present on the property. Additionally, EGLE records document that the property has had at least 39 registered ASTs. The bulk storage included various oils, fuels, and solvents. Benzene, ethylbenzene, tetrachloroethylene (PCE), toluene, trichloroethylene (TCE), vinyl chloride, and xylenes have impacted the groundwater and soils of the site. The contamination plume extends offsite and encompasses a large portion of Mason. Additionally, based on the large scale of solvent storage and the sand geology, the potential for the migration of vapor is present. Based on the close proximity from the subject property to the area of operations (less than 100 feet), the long term of bulk storage (since at least the 1950s), the regional sand geology, and the large scale of operations, the potential exists for a release to have occurred on this property and to have migrated onto the subject property.
- The southwest adjoining property, identified as 402 North Street, has been occupied by a bulk chemical storage company since at least the 1930s. Review of the regulatory database indicates that the property formerly contained at least 11 ASTs used to store bulk fuel. Additionally, the property contained a 560-gallon gasoline UST and a 2,000-gallon kerosene UST which were removed in 1990. Based on the long time period of operations, the groundwater flow direction (towards the subject property), and the regional sand geology, the potential exists for a release to have occurred on this property and to have migrated onto the subject property.
- The northwest adjoining property, identified as 454 North Street, was occupied by various industrial operations from at least the 1930s until 2014. Review of EGLE records document a naphthalene plume in two separate zones on the Americhem property (340 North Street); and therefore, it was concluded two sources may be present. The records suggest that this property is hydraulically upgradient of the documented Americhem plume and may be a source of the naphthalene. Review of the BEA performed for this property in 1999 indicates soils and groundwater have been impacted with various volatile organic compounds (VOCs) and PNAs above current EGLE Part 201 GCC. Additionally, the figures depict a former wastewater treatment plant and sludge handling company were located along the east property boundary (nearest the subject property). Based on this information, the groundwater flow direction (towards the property), and the long-term manufacturing operations, the potential exists for a release to have occurred and to have migrated onto the subject property.

## **2015 Phase II ESA**

On December 17, 2015, PM completed a geophysical survey investigation utilizing ground penetrating radar (GPR) at the subject property to investigate the potential for orphan USTs and to clear soil boring locations of private utilities. No anomalies consistent with the presence of orphan USTs were identified during the geophysical survey investigation. The GPR survey area is depicted on Figure 2.

On December 17, 2015, PM completed the field portion of the Phase II ESA consisting of the advancement of five soil borings (SB-1 through SB-5), the installation of five temporary monitoring wells (TMW-1 through TMW-5), and the collection of two soil samples and five groundwater samples for laboratory analysis of VOCs, PNAs, nitrate, nitrite, ammonia, pesticides, herbicides, total phosphorous, arsenic, and lead, or some combination thereof. The soil boring/temporary monitoring well locations are depicted on Figures 3 and 4.

Based on the concentrations identified during the previous site investigation, PM completed a BEA (BEA ID: B201602139LA) dated January 8, 2016 for the new owner to obtain liability protection for the existing contamination.

### **1.4 Geology and Hydrogeology**

The soil stratigraphy at the subject property consists of sand to a depth of at least 20.0 feet bgs, the maximum depth explored.

Groundwater was encountered within each of PM's soil boring locations at depths between 5.91 and 7.30 feet below ground surface (bgs).

### **1.5 Contaminated Media on the Subject Property**

PM compared the analytical results of the soil and groundwater samples collected from the subject property with the EGLE Generic Cleanup Criteria and Screening Levels as presented in Part 201 Rules 299.1 through 299.50, dated December 21, 2020 entitled "Cleanup Criteria Requirements for Response Activity", in accordance with Section 21323a(1)(b)(i) using the Residential and Nonresidential cleanup criteria.

PM also compared the analytical results of the soil and groundwater samples collected from the subject property with the EGLE Volatilization to Indoor Air Inhalation Pathway (VIAP) screening levels (September 4, 2020, updated February 2024). Although not an enforceable standard or a standard by which documentation of due care compliance may be demonstrated, the available VIAP screening levels are consistent with EGLE provided site specific values and are a means to discuss risk and potential due care requirements for a property.

The soil and groundwater analytical results are summarized in Tables 1, 2, and 3, and on Figures 3 and 4.

#### **1.5.1 Summary of Soil Analytical Results**

PM's December 2015 soil analytical results are summarized on Figure 3 and in Table 1.

No concentrations of VOCs and PNAs were detected in either of the soil samples collected from the subject property at SB-1 (1.0-2.0 feet bgs) and SB-2 (3.0-4.0 feet bgs) above laboratory MDLs.

A concentration of ammonia (unionized fraction) was detected in the soil sample collected from SB-2 (3.0-4.0 feet bgs) above the Part 201 Groundwater Surface Water Interface Protection (GSIP) cleanup criteria. A concentration ammonia was detected in the soil sample collected from SB-1 (1.0-2.0 feet bgs) above laboratory MDLs but below the most restrictive Part 201 Residential cleanup criteria. Concentrations of nitrate were detected in each of the soil samples collected from the subject property above the laboratory MDLs but below the most restrictive Part 201 Residential cleanup criteria. No concentrations of nitrite were detected in either soil samples collected above laboratory MDLs.

No concentrations of pesticides and herbicides were detected in either of the soil samples collected from the subject property above laboratory MDLs.

Concentrations of total phosphorous were detected in the soil samples collected from SB-1 (1.0-2.0 feet bgs) and SB-2 (3.0-4.0 feet bgs) above the Part 201 GSIP cleanup criteria.

Concentrations of arsenic and lead were detected in each of the soil samples collected from the subject property above laboratory MDLs but below the Michigan Statewide Default Background Levels (SDBLs) or most restrictive Part 201 Residential cleanup criteria.

### **1.5.2 Summary of Groundwater Analytical Results**

PM's December 2015 groundwater analytical results are summarized on Figure 4 and in Tables 2 and 3.

Concentrations of 2-methylnaphthalene, naphthalene, and 1,2,4-trimethylbenzene (TMB) were detected in the groundwater sample collected from TMW-5 above the Part 201 Groundwater Surface Water Interface (GSI) cleanup criteria. Concentrations of various other VOCs were detected in the each of the remaining groundwater samples collected from the subject property (TMW-1 through TMW-4) above laboratory MDLs, but below the most restrictive Part 201 Residential cleanup criteria.

Concentrations of 2-methylnaphthalene and naphthalene were detected in the groundwater samples collected from TMW-4 and TMW-5 above the Part 201 GSI cleanup criteria. No concentrations of PNAs were detected in the remaining groundwater samples collected from the subject property (TMW-1 through TMW-3) above laboratory MDLs.

Concentrations of nitrate were detected in the groundwater samples collected from TMW-1 and TMW-3 above the Part 201 Residential and Nonresidential Drinking Water (DW) cleanup criteria. Concentrations of nitrate were also detected in each of the remaining two select groundwater samples analyzed (TMW-2 and TMW-4) above laboratory MDLs but below the most restrictive Part 201 Residential cleanup criteria.

A concentration of nitrite was detected in the groundwater sample collected from TMW-1 above the Part 201 Residential and Nonresidential DW cleanup criteria. No other concentrations of nitrite were detected in the remaining select groundwater samples analyzed (TMW-2, TMW-3, and TMW-4) above laboratory MDLs.

A concentration of ammonia was detected in the groundwater sample collected from TMW-1 above the Part 201 Residential and Nonresidential DW cleanup criteria. Concentrations of ammonia (unionized fraction) were also detected in the groundwater samples collected from TMW-1 and TMW-2 above the Part 201 GSI cleanup criteria. Concentrations of ammonia were detected in the groundwater samples collected from TMW-3 and TMW-4 above laboratory MDLs, but below the most restrictive Part 201 Residential cleanup criteria.

No concentrations of pesticides were detected in any of the select groundwater samples analyzed above laboratory MDLs.

A concentration of the herbicide dicamba was detected in the groundwater sample collected from TMW-2 above the Part 201 Residential and Nonresidential DW cleanup criteria. No other concentrations of herbicides were detected in the select groundwater samples analyzed (TMW-1, TMW-3, and TMW-4) above laboratory MDLs.

Concentrations of total phosphorous were detected in the groundwater samples collected from TMW-1 and TMW-3 above the Part 201 GSI cleanup criteria. Concentrations of total phosphorous were detected in the remaining select groundwater samples analyzed (TMW-2 and TMW-4) above laboratory MDLs, but below the most restrictive Part 201 Residential cleanup criteria.

Concentrations of arsenic were detected in the groundwater sample collected from TMW-1 above the Part 201 Residential and Nonresidential DW and GSI cleanup criteria. A concentration of lead was also detected in the groundwater sample collected from TMW-1 above the Part 201 Residential and Nonresidential DW cleanup criteria. No concentrations of arsenic and lead were detected in the remaining select groundwater sample analyzed from TMW-2 above laboratory MDLs.

## **2.0 EXPOSURE PATHWAY EVALUATION**

The following exposure pathways were evaluated and determined to be complete/potentially complete. Exposure pathways are eliminated when they are determined not to be complete or it is demonstrated that unacceptable exposures do not exist and that response activities are not required to prevent or mitigate unacceptable exposures.

The subject property is currently zoned M-1: Light Manufacturing. The intended use and zoning are consistent with a Nonresidential property use as defined under Part 201.

The following exposure pathway analysis is based on the currently known information collected during the previous and current site investigations. If evidence is discovered of additional impact, the exposure pathways will need to be re-evaluated.

Exposure Pathway Evaluation		
Complete Pathway?	Relevant Property Conditions	Explanation, if not complete
Drinking water pathway is not complete	A person cannot drink groundwater because groundwater is not being used on the property for any purpose.	No potable water wells are present or will be installed on the property and municipal water is available to the property.

<b>Exposure Pathway Evaluation</b>		
<b>Complete Pathway?</b>	<b>Relevant Property Conditions</b>	<b>Explanation, if not complete</b>
Direct contact pathway is complete	A person can come in contact with contaminated soils on the property (below surface construction or utility activities).	
Soil particulate inhalation pathway is complete	A person can inhale ambient air particulates from substances present in soils (with or without vegetation) via wind erosion of contaminated soils and vehicle traffic.	
Soil volatilization to ambient air pathway is complete	A person can inhale ambient air that contains vapors from volatile substances present in soil.	
Volatilization to indoor air pathway is complete	A person can inhale substances in indoor air from volatile substances present in soil, groundwater, and soil gas because a building is present.	
Groundwater-Surface Water Interface Pathway is not complete	A person cannot come in contact with surface water on the property where groundwater is venting to the surface water with contaminants that would present human exposure concerns (e.g., pH exceedances).	Surface water is not present on the subject property

<b>OTHER PATHWAYS AND DUE CARE CONSIDERATIONS</b>	
Migration Via Utility Corridors	Utility corridors on or adjacent to the subject property may represent pathways for contaminant migration, but were not specifically assessed by PM. Utility corridors may additionally act as a conduit for vapor and direct contact exposure to parties completing subsurface work. Therefore, written notices will be provided to utility franchise holders of record, and the owners and/or operators of all public utilities that serve the subject property (Appendix A).
Fire and Explosion Hazards	No compounds were identified above the flammability and explosivity screening level and no non-aqueous phase liquid (NAPL) was identified.
Soil and Groundwater Management	In the event that soil and/or groundwater are to be moved at the subject property, additional characterization will be required to determine proper disposal. Water on the property is municipally supplied, and the property owner will assure that groundwater is not utilized for any purpose.

### **3.0 PLAN FOR RESPONSE ACTIVITIES**

No target analytes were identified during the current site investigation necessitating response activities to control unacceptable exposure based on the current and intended Nonresidential use of the property. However, activities to comply with Section 7a, as outlined in Section 4.0, are still required.

## **Notices**

Based on the exceedances of the Part 201 Residential and Nonresidential DW and GSIP/GSI cleanup criteria, written notices will be provided to utility franchise holders of record, and the owners and/or operators of all public utilities that serve the subject property within 45 days of initial ownership or operation of the subject property (Appendix A).

If changes to the property use, zoning, operations, and/or layout occur, re-evaluation of potential exposure pathways and associated amendments to this report will be required. Additionally, if legislative changes to vapor intrusion guidance are introduced, re-evaluation of the vapor intrusion pathway may be required.

## **4.0 EVALUATION AND DEMONSTRATION OF COMPLIANCE WITH SECTION 7A OBLIGATIONS**

The following sections provide documentation that the proposed usage of the subject property will be in compliance with Section 7a obligations.

### **4.1 Exacerbation (Section 7a(1)(a))**

The following measures will be undertaken to prevent exacerbation of existing contamination:

- In the event the property owner or occupant, or a third party intends to move soil or groundwater (if encountered), proper characterization and/or proper disposal will be completed.
- If construction activities occur in the future, control measures will be planned and implemented in a manner as to not increase offsite property migration along subsurface utility, sewer, or structure corridors.
- The subject property is connected to municipal water and the owner will assure that the groundwater on the property is not utilized for any purpose, except for wells and devices that are part of an EGLE-approved response activity. Short-term dewatering for construction purposes is permitted, provided the dewatering, including management and disposal of the groundwater, is conducted in accordance with all applicable local, state, and federal laws and regulations and does not cause or result in the exacerbation of contamination, or any other violation of local, state, and federal environmental laws and regulations including, but not limited to, Parts 201/213 of the NREPA, as amended.

### **4.2 Due Care (Section 7a(1)(b))**

Based on the current and anticipated use, due care will be exercised to allow for the intended use of the facility in a manner that protects the public health and safety.

The owner/operator will ensure that groundwater at the subject property is not utilized for any purpose.

In the event that previously unknown sources of contamination are discovered on the subject property during future investigation, development, and/or construction activities, an appropriate

course of action will be implemented to evaluate the nature of the source, the extent of the contamination as feasible, and the appropriate course of action to prevent unacceptable exposure to subject property occupants and onsite workers, and prevent exacerbation of existing contamination.

#### **4.3 Reasonable Precautions (Section 7a(1)(c))**

Reasonable precautions will be taken against the reasonable foreseeable acts or omissions of a third party and the consequences that are foreseeable could result from those acts or omissions.

Third parties who intend to perform subsurface work on the property will be notified prior to beginning work to allow proper management of impacted soil (if present) to prevent exacerbation and to comply with Section 7a.

Notices will be provided to utility companies and easement holders as notification to allow proper management of impacted groundwater (if present) and to prevent unacceptable exposure to comply with Section 7a within the statutory guidelines (Appendix A).

#### **4.4 Reasonable Cooperation, Assistance, and Access (Section 7a(1)(d))**

Reasonable cooperation, assistance, and access will be provided to the persons (i.e. including liable parties) that are authorized to conduct response activities at the facility, including the cooperation and access necessary for the installation, integrity, operation, and maintenance of any complete or partial response activity at the facility.

Third parties who intend to perform subsurface work on the property will be notified prior to beginning work to allow proper management of impacted soil and groundwater (if present) to prevent exacerbation and to comply with Section 7a.

#### **4.5 Use Restriction Compliance (Section 7a(1)(e))**

No land use or resource use restrictions are in place for the subject property. In the event that any other land use or resource use restriction is placed on the property, the owner will comply with them.

#### **4.6 Effectiveness or Integrity of Use Restrictions (Section 7a(1)(f))**

As discussed in Section 4.5, no land use or resource use restrictions are known or required in connection with the subject property.

In the event that any land use or resource use restrictions are placed on the property, the effectiveness and integrity of the land use or resource restrictions employed at the property will not be impeded.

### **5.0 DUE CARE DOCUMENTATION**

Documentation is to be maintained for the subject property, demonstrating that the subject property is in compliance with Section 7a of Part 201. Any requested compliance documentation must be made available to EGLE upon request. Compliance documentation includes, but is not limited to the following:

*Documentation of Due Care Compliance for the Commercial Property  
Located at 395 North Mason Street, Mason, Michigan  
Parcel Identification #: 33-19-10-05-452-004  
PM Project No. R242.10061.000.0003; September 9, 2024*

- Documentation of subsurface construction activities in impacted areas, including any soil, groundwater, and/or soil gas sampling/characterization reports and waste disposal manifests.
- Copies of notices to third party contractors who may work sub-grade on the subject property, including excavation contractors and utility employees.
- Documentation of additional investigations and/or mitigation measures to prevent unacceptable exposures (if applicable).

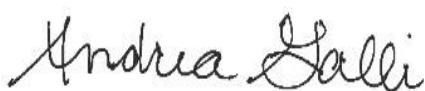
If you have questions regarding this report, please contact PM at 800.313.2966.

**REPORT PREPARED BY:**



Aaron Snow  
Project Scientist

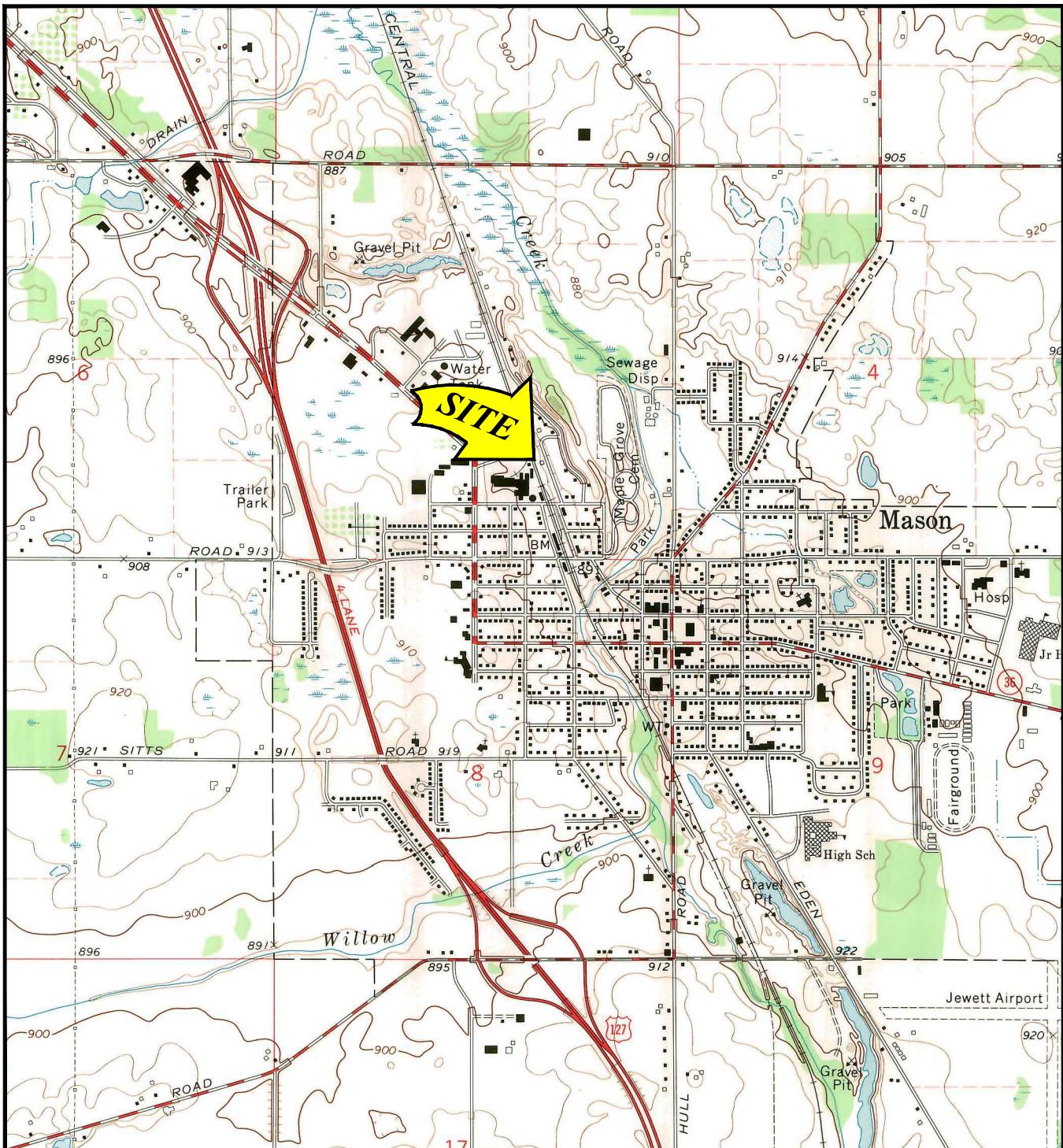
**REPORT REVIEWED BY:**



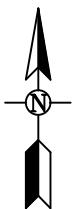
Andrea Galli  
National Manager – Site Investigation Services

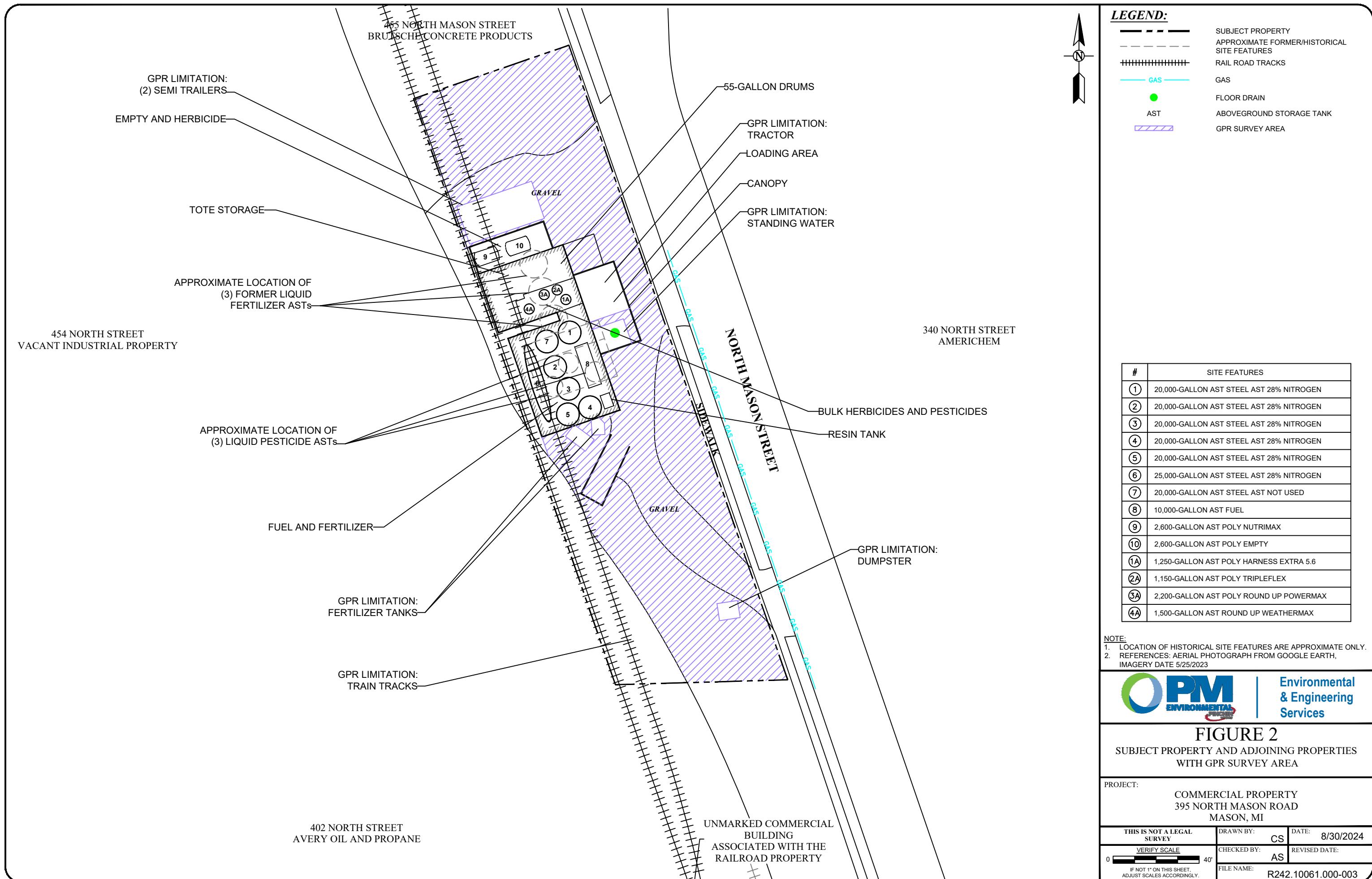
# Figures

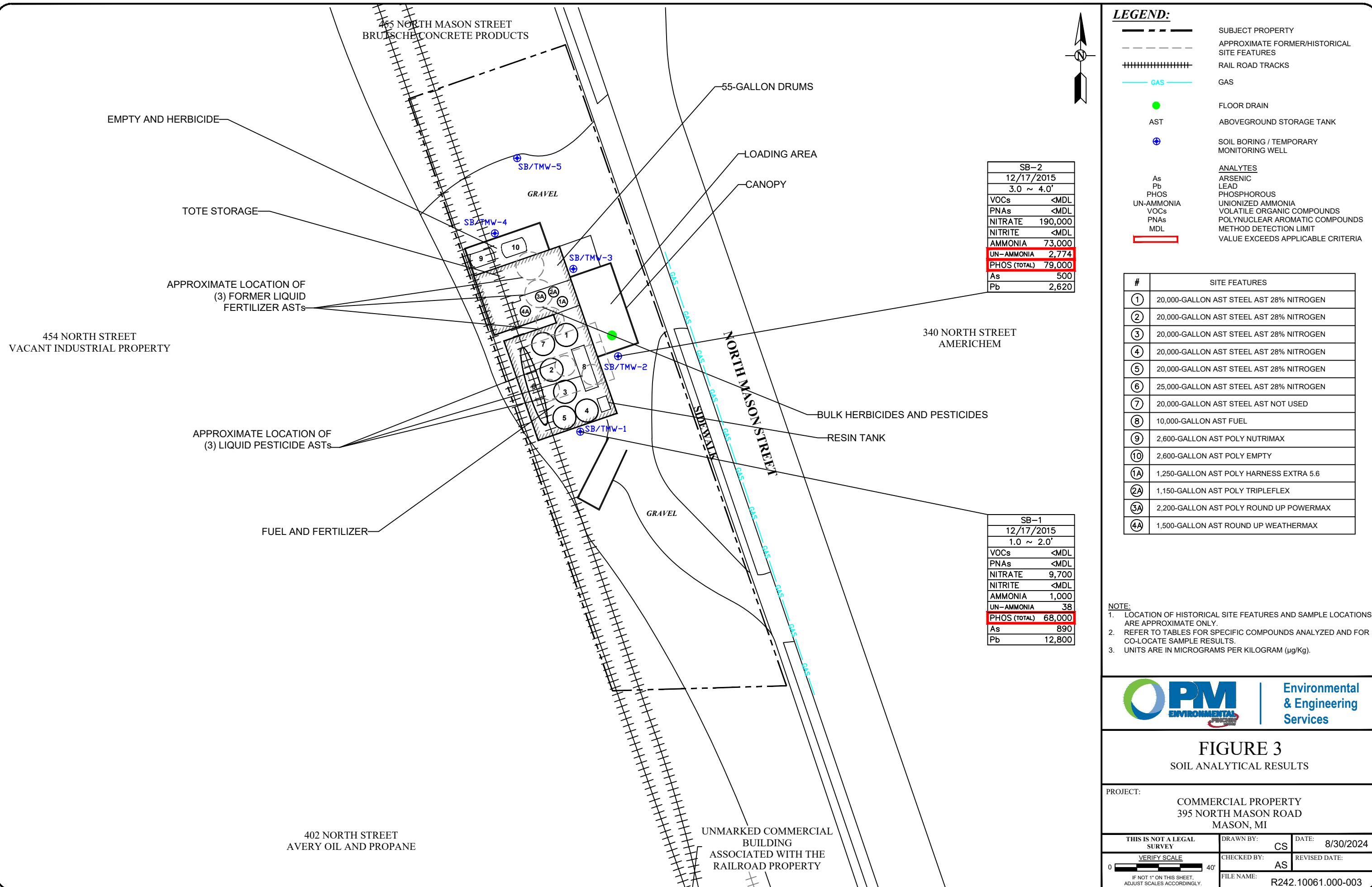


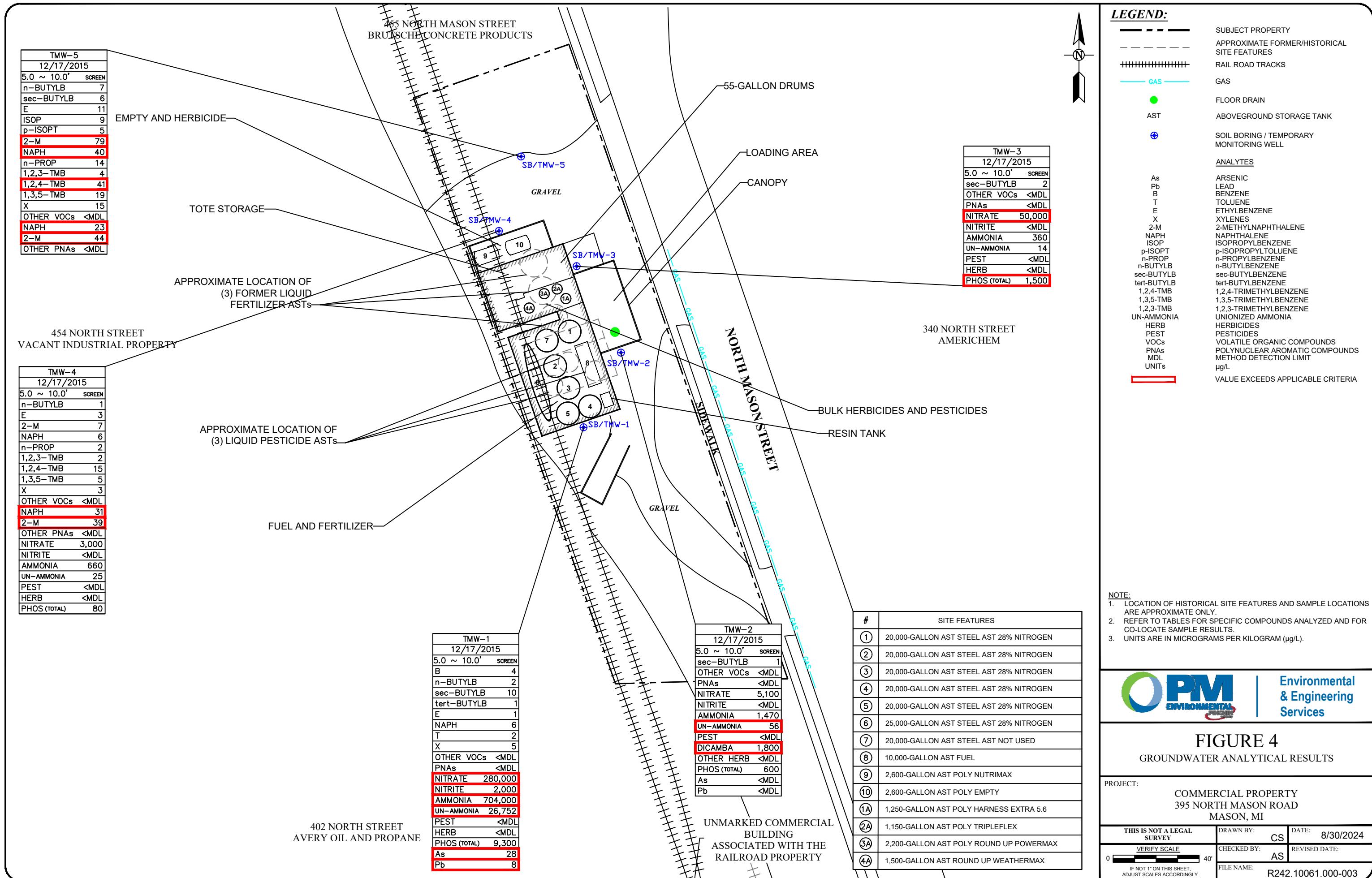


**INGHAM COUNTY**  
**FIGURE 1**  
**PROPERTY VICINITY MAP**  
**UNITED STATES GEOLOGICAL SURVEY, 7.5 MINUTE SERIES**  
**MASON, MI QUADRANGLE, 1993.**









# Tables



**TABLE 1**  
**SUMMARY OF SOIL ANALYTICAL RESULTS**  
**VOCs, PNAs, NITROGEN COMPOUNDS, PESTICIDES, HERBICIDES, PHOSPHORUS, AND METALS**  
**395 NORTH MASON STREET, MASON, MICHIGAN**  
**PM PROJECT # R242.10061.000.0003**

Volatile Organic Compounds (VOCs), Polynuclear Aromatic Hydrocarbons (PNAs), Nitrogen Compounds, Pesticides, Herbicides, Phosphorus, and Metals ( $\mu\text{g/Kg}$ )			VOCs	PNAs	Nitrate	Nitrite	Ammonia	Unionized Ammonia (CC)	Pesticides	Herbicides	Total Phosphorous	Arsenic	Lead
Chemical Abstract Service Number (CAS#)			Various	Various	14797558	14797650	7664417	7664417	Various	Various	7723140	7440382	7439921
Sample ID	Sample Date	Sample Depth (feet bgs)	VOCs	PNAs	Nitrogen Compounds				Pesticides	Herbicides	Phosphorous	Metals	
SB-1	12/17/2015	1.0-2.0	<MDL	<MDL	9,700	<3,000	1,000	38	<MDL	<MDL	<b>68,000</b>	890	12,800
SB-2	12/17/2015	3.0-4.0	<MDL	<MDL	190,000	<3,300	73,000	<b>2,774</b>	<MDL	<MDL	<b>79,000</b>	500	2,620
Cleanup Criteria Requirements for Response Activity (R 299.1 - R 299.50) Generic Soil Cleanup Criteria Tables 2 and 3: Residential and Non-Residential Part 201 Generic Cleanup Criteria and Screening Levels/Part 213 Risk-Based Screening Levels, December 21, 2020 EGLE Volatilization to Indoor Air Pathway (VIAP) Screening Levels, February 28, 2024													
Residential ( $\mu\text{g/Kg}$ )													
Statewide Default Background Levels			NA	NA	NA	NA	NA	NA	NA	NA	NA	5,800	21,000
Drinking Water Protection (Res DWP)			Various	Various	2.0E+5 {N}	20,000 {N}	ID	NA	Various	Various	1.30E+06	4,600	7.00E+05
Groundwater Surface Water Interface Protection (GSIP)			Various	Various	ID	NA	{CC}	580 (CC)	Various	Various	20,000 {EE}	4,600	7.0E+06 (G,X)
Soil Volatilization to Indoor Air Inhalation (Res SVII)			Various	Various	NLV	NLV	ID	NA	Various	Various	NLV	NLV	NLV
Ambient Air Infinite Source Volatile Soil Inhalation (Res VSI)			Various	Various	NLV	NLV	ID	NA	Various	Various	NLV	NLV	NLV
Ambient Air Finite VSI for 5 Meter Source Thickness			Various	Various	NLV	NLV	ID	NA	Various	Various	NLV	NLV	NLV
Ambient Air Finite VSI for 2 Meter Source Thickness			Various	Various	NLV	NLV	ID	NA	Various	Various	NLV	NLV	NLV
Ambient Air Particulate Soil Inhalation (Res PSI)			Various	Various	ID	ID	6.70E+09	NA	Various	Various	6.70E+07	7.20E+05	1.00E+08
Direct Contact (Res DC)			Various	Various	ID	ID	ID	NA	Various	Various	1.0E+09 {D}	7,600	4.00E+05
Nonresidential ( $\mu\text{g/Kg}$ )													
Drinking Water Protection (Nonres DWP)			Various	Various	2.0E+5 {N}	20,000 {N}	ID	NA	Various	Various	4.80E+06	4,600	7.00E+05
Soil Volatilization to Indoor Air Inhalation (Nonres SVII)			Various	Various	NLV	NLV	ID	NA	Various	Various	NLV	NLV	NLV
Ambient Air Infinite Source Volatile Soil Inhalation (Nonres VSI)			Various	Various	NLV	NLV	ID	NA	Various	Various	NLV	NLV	NLV
Ambient Air Finite VSI for 5 Meter Source Thickness			Various	Various	NLV	NLV	ID	NA	Various	Various	NLV	NLV	NLV
Ambient Air Finite VSI for 2 Meter Source Thickness			Various	Various	NLV	NLV	ID	NA	Various	Various	NLV	NLV	NLV
Ambient Air Particulate Soil Inhalation (Nonres PSI)			Various	Various	ID	ID	2.90E+09	NA	Various	Various	2.80E+08	9.10E+05	4.40E+07
Direct Contact (Nonres DC)			Various	Various	ID	ID	ID	NA	Various	Various	1.0E+09 {D}	37,000	9.0E+5 {DD}
Screening Levels ( $\mu\text{g/Kg}$ )													
Soil Saturation Concentration Screening Levels (C <sub>sat</sub> )			Various	Various	NA	NA	1.00E+07	NA	Various	Various	NA	NA	NA
Residential Volatilization to Indoor Air Pathway Screening Level (VIAP)			Various	Various	NA	NA	DATA	NA	Various	Various	NA	NL	NL
Nonresidential Volatilization to Indoor Air Pathway Screening Level (VIAP)			Various	Various	NA	NA	DATA	NA	Various	Various	NA	NL	NL

Criteria/RBSL Exceeded

**BOLD** Value Exceeds Criteria

Value Exceeds Screening Level

underline Screening Level Exceeded

$\mu\text{g/Kg}$  Micrograms Per Kilogram

bgs Below Ground Surface

<MDL Not detected at levels above the laboratory Method Detection Limit (MDL)

NA Not Applicable

NL Not Listed

NLV Not Likely to Volatilize

ID Insufficient Data

{ } Other Alpha notation, please refer to EGLE Footnotes R 299.49 Footnotes for Generic Cleanup Criteria Tables, December 21, 2020

( ) Other Alpha notation, please refer to EGLE Guidance for the Vapor Intrusion Pathway Appendix D.1 Footnotes, February 28, 2024

DATA Insufficient physical chemical parameters to calculate a VIAP screening level for specified media. If detections are present in specified media, health-based soil vapor value should be used to evaluate risk.

(G) Metal GSIP Criteria for Surface Water Not Protected for Drinking Water Use based on 339 mg/L CaCO<sub>3</sub> Hardness: Station ID 330018, Sycamore Creek at Holt Road, Alaledon Township, MI.

TABLE 2  
SUMMARY OF GROUNDWATER ANALYTICAL RESULTS  
VOCs AND PNAs  
395 NORTH MASON STREET, MASON, MI  
PM PROJECT # R242.10061.000.0003

Volatile Organic Compounds (VOCs) and Polynuclear Aromatic Hydrocarbons (PNAs) (µg/L)				Benzene	n-Butylbenzene	sec-Butylbenzene	tert-Butylbenzene	Ethylbenzene	Isopropylbenzene	p-Isopropyltoluene	2-Methylnaphthalene	Naphthalene	n-Propylbenzene	Toluene	1,2,3-Trimethylbenzene*	1,2,4-Trimethylbenzene	1,3,5-Trimethylbenzene	Xylenes	Other VOCs	Naphthalene	2-Methylnaphthalene	Other PNAs		
Chemical Abstract Service Number (CAS#)				71432	104518	135988	98066	100414	98828	99876	91576	91203	103651	108883	526738	95636	108678	1330207	Various	91203	91576	Various		
Sample ID	Sample Date	Screen Depth (bgs)	Depth to Groundwater (bgs)	VOCs																		PNAs		
TMW-1	12/17/2015	5.0-10.0	7.3	4	2	10	1	1	<5	<5	<5	6	<1	2	<1	<1	<1	5	<MDL	<5	<5	<MDL		
TMW-2	12/17/2015	5.0-10.0	5.91	<1	<1	1	<1	<1	<5	<5	<5	<5	<1	<1	<1	<1	<1	<3	<MDL	<5	<5	<MDL		
TMW-3	12/17/2015	5.0-10.0	5.94	<1	<1	2	<1	<1	<5	<5	<5	<5	<1	<1	<1	<1	<1	<3	<MDL	<5	<5	<MDL		
TMW-4	12/17/2015	5.0-10.0	6.8	<1	1	<1	<1	3	<5	<5	7	6	2	<1	2	15	5	3	<MDL	31	39	<MDL		
TMW-5	12/17/2015	5.0-10.0	6.5	<1	7	6	<1	11	9	5	79	40	14	<1	4	41	19	15	<MDL	23	44	<MDL		

Cleanup Criteria Requirements for Response Activity (R 299.1 - R 299.50)  
Generic Groundwater Cleanup Criteria Table 1: Residential and Non-Residential Part 201 Generic Cleanup Criteria and Screening Levels/Part 213 Risk-Based Screening Levels, December 21, 2020  
EGLE Volatilization to Indoor Air Pathway (VIAP) Screening Levels, February 28, 2024

Residential/Nonresidential (µg/L)																			
Residential Drinking Water (Res DW)	5.0 {A}	80	80	80	74 {E}	800	NL	260	520	80	790 {E}	63 {E}	63 {E}	72 {E}	280 {E}	Various	520	260	Various
Residential Health Based Drinking Water Values	NL	NL	NL	NL	700 {E}	NL	NL	NL	NL	1,000 {E}	NL	1,000 {E}	1,000 {E}	10,000 {E}	Various	NL	NL	Various	
Nonresidential Drinking Water (Nonres DW)	5.0 {A}	230	230	230	74 {E}	2,300	NL	750	1,500	230	790 {E}	63 {E}	63 {E}	72 {E}	280 {E}	Various	1,500	750	Various
Nonresidential Health Based Drinking Water Values	NL	NL	NL	NL	700 {E}	NL	NL	NL	NL	1,000 {E}	NL	1,000 {E}	2,900 {E}	2,900 {E}	10,000 {E}	Various	NL	NL	Various
Groundwater Surface Water Interface (GSI)	200 {X}	ID	ID	ID	18	28	NL	19	11	ID	270	17	17	45	49	Various	11	19	Various
Residential Groundwater Volatilization to Indoor Air Inhalation (Res GVII) <sup>1</sup>	5,600	ID	ID	ID	1.10E+05	56,000 {S}	NL	25,000 {S}	31,000 {S}	ID	5.3E+5 {S}	56,000 {S}	56,000 {S}	61,000 {S}	1.9E+5 {S}	Various	31,000 {S}	25,000 {S}	Various
Nonresidential Groundwater Volatilization to Indoor Air Inhalation (Nonres GVII) <sup>1</sup>	35,000	ID	ID	ID	T	56,000 {S}	NL	25,000 {S}	31,000 {S}	ID	5.3E+5 {S}	56,000 {S}	56,000 {S}	61,000 {S}	1.9E+5 {S}	Various	31,000 {S}	25,000 {S}	Various
Screening Levels (µg/L)																			
Residential Shallow Volatilization to Indoor Air Pathway Screening Level (VIAP) <sup>2</sup>	1.0	44	270	7.7E-02 {M}	2.8	0.60 {M}	NL	66	4.2 {M}	43 {DD}	300 {FF}	43 {JT}	25 {JT}	18 {JT}	75 {J}	Various	4.2 {M}	66	Various
Residential Volatilization to Indoor Air Pathway Screening Level (VIAP) <sup>3</sup>	28	1,100	8,100	1.8	74	15	NL	2,000	130	6,100 {DD}	41,000	1,200 {JT}	670 {JT}	470 {JT}	2,000 {J}	Various	130	2,000	Various
Nonresidential Shallow Volatilization to Indoor Air Pathway Screening Level (VIAP) <sup>4</sup>	17	720	790	1.4	56	13	NL	230	23	970 {DD}	6,600 {FF}	300 {JT}	240 {JT}	220 {JT}	810 {J}	Various	23	230	Various
Nonresidential Volatilization to Indoor Air Pathway Screening Level (VIAP) <sup>5</sup>	130	3,100	18,000 {S}	5.3	350	71	NL	5,900	590	6,100 {DD}	59,000 {EE}	3,600 {JT}	2,000 {JT}	1,400 {JT}	5,900 {J}	Various	590	5,900	Various
Water Solubility	1.75E+06	NA	NA	NA	1.69E+05	56,000	NL	25,000	31,000	NA	5.26E+05	56,000	56,000	61,000	1.86E+05	Various	3.10E+04	2.46E+04	Various
Flammability and Explosivity Screening Level	68,000	ID	ID	ID	43,000	29,000	NL	ID	NA	ID	61,000	56,000 {S}	56,000 {S}	ID	70,000	Various	ID	ID	Various

Criteria/RBSL Exceeded

**BOLD** Value Exceeds Criteria

Value Exceeds Screening Level

underline Screening Level Exceeded

<sup>1</sup> Tier 1 GVII Criteria based on 3 meter (or greater) groundwater depth

<sup>2</sup> Screening Levels based on depth to groundwater less than 10.0 feet

<sup>3</sup> Screening Levels based on depth to groundwater greater than 10.0 feet and not in contact with the building foundation

<sup>4</sup> Screening Levels based on depth to groundwater less than 5.0 feet

<sup>5</sup> Screening Levels based on depth to groundwater greater than 5.0 feet and not in contact with the building foundation

µg/L Micrograms Per Liter

bgs Below Ground Surface

<MDL Not detected at levels above the laboratory Method Detection Limit (MDL)

NA Not Applicable

NL Not Listed

ID Insufficient Data

{ } Other Alpha notation, please refer to EGLE Footnotes R 299.49 Footnotes for Generic Cleanup Criteria Tables, December 21, 2020

( ) Other Alpha notation, please refer to EGLE Guidance for the Vapor Intrusion Pathway Appendix D.1 Footnotes, February 28, 2024

TABLE 3  
 SUMMARY OF GROUNDWATER ANALYTICAL RESULTS  
 NITRATE, NITRITE, AMMONIA, PESTICIDES, HERBICIDES, PHOSPHORUS, AND METALS  
 395 NORTH MASON STREET, MASON MICHIGAN  
 PM PROJECT # R242.10061.000.0003

Nitrate, Nitrite, Ammonia, Pesticides, Herbicides, Phosphorus, and Metals ( $\mu\text{g/L}$ )				Nitrate	Nitrite	Ammonia	Unionized Ammonia (C <sub>C</sub> )	Pesticides	Dicamba	Other Herbicides	Total Phosphorous	Arsenic	Lead
Chemical Abstract Service Number (CAS#)				14797558	14797650	7664417	7664417	Various	1918009	Various	7723140	7440382	7439921
Sample ID	Sample Date	Screen Depth (bgs)	Depth to Groundwater (bgs)	Nitrogen Compounds				Pesticides	Herbicides		Phosphorous	Metals	
TMW-1	12/17/2015	5.0-10.0	7.3	280,000	2,000	704,000	26,752	<MDL	<1.1	<MDL	9,300	28	8
TMW-2	12/17/2015	5.0-10.0	5.91	5,100	<100	1,470	56	<MDL	1,800	<MDL	600	<2	<3
TMW-3	12/17/2015	5.0-10.0	5.94	50,000	<1,000	360	14	<MDL	<1.2	<MDL	1,500	NA	NA
TMW-4	12/17/2015	5.0-10.0	6.8	3,000	<100	660	25	<MDL	<1	<MDL	80	NA	NA
TMW-5	12/17/2015	5.0-10.0	6.5	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
<b>Cleanup Criteria Requirements for Response Activity (R 299.1 - R 299.50)</b> <b>Generic Groundwater Cleanup Criteria Table 1: Residential and Non-Residential Part 201 Generic Cleanup Criteria and Screening Levels/Part 213 Risk-Based Screening Levels, December 21, 2020</b> <b>EGLE Volatilization to Indoor Air Pathway (VIAP) Screening Levels, February 28, 2024</b>													
<b>Residential/Nonresidential (<math>\mu\text{g/L}</math>)</b>													
Residential Drinking Water (Res DW)				10,000 (A,N)	1,000 (A,N)	10,000 (N)	NA	Various	220	Various	63,000	10 {A}	4.0 {L}
Residential Health Based Drinking Water Values				NL	NL	NL	NA	Various	NL	Various	NL	NL	NL
Nonresidential Drinking Water (Nonres DW)				10,000 (A,N)	1,000 (A,N)	10,000 (N)	NA	Various	630	Various	2.40E+05	10 {A}	4.0 {L}
Nonresidential Health Based Drinking Water Values				NL	NL	NL	NA	Various	NL	Various	NL	NL	NL
Groundwater Surface Water Interface (GSI)				ID	NA	(CC)	29 (CC)	Various	NA	Various	1,000 (EE)	10	40 {G,X}
Residential Groundwater Volatilization to Indoor Air Inhalation (Res GVII) <sup>1</sup>				NLV	NLV	3.20E+06	NA	Various	NLV	Various	NLV	NLV	NLV
Nonresidential Groundwater Volatilization to Indoor Air Inhalation (Nonres GVII) <sup>1</sup>				NLV	NLV	7.10E+06	NA	Various	NLV	Various	NLV	NLV	NLV
<b>Screening Levels (<math>\mu\text{g/L}</math>)</b>													
Residential Shallow Volatilization to Indoor Air Pathway Screening Level (VIAP) <sup>2</sup>				NA	NA	1,900 (FF)	NA	Various	NA	Various	NA	NA	NA
Residential Volatilization to Indoor Air Pathway Screening Level (VIAP) <sup>3</sup>				NA	NA	1.2E+06	NA	Various	NA	Various	NA	NA	NA
Nonresidential Shallow Volatilization to Indoor Air Pathway Screening Level (VIAP) <sup>4</sup>				NA	NA	4,600 (FF)	NA	Various	NA	Various	NA	NA	NA
Nonresidential Volatilization to Indoor Air Pathway Screening Level (VIAP) <sup>5</sup>				NA	NA	2.7E+06 (EE)	NA	Various	NA	Various	NA	NA	NA
Water Solubility				NA	NA	5.30E+08	NA	Various	4.50E+06	Various	NA	NA	NA
Flammability and Explosivity Screening Level				ID	ID	ID	ID	Various	ID	Various	ID	ID	ID

  Criteria/RBSL Exceeded

**BOLD** Value Exceeds Criteria

  Value Exceeds Screening Level

underline Screening Level Exceeded

<sup>1</sup> Tier 1 GVII Criteria based on 3 meter (or greater) groundwater depth

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$\mu\text{g/L}$  Micrograms Per Liter

bgs Below Ground Surface

<MDL Not detected at levels above the laboratory Method Detection Limit (MDL)

NA Not Applicable

NL Not Listed

NLV Not Likely to Volatilize

ID Insufficient Data

{G} Metal GSI Criteria for Surface Water Not Protected for Drinking Water Use based on 339 mg/L CaCO<sub>3</sub> Hardness: Station ID 330018, Sycamore Creek at Holt Road, Alaledon Township, MI.

{ } Other Alpha notation, please refer to EGLE Footnotes R 299.49 Footnotes for Generic Cleanup Criteria Tables, December 21, 2020

# Appendix A





**Corporate Headquarters**  
Lansing, Michigan  
3340 Ranger Road, Lansing, MI 48906  
**f:** 877.884.6775  
**t:** 517.321.3331

**Michigan Locations**  
Berkley  
Grand Rapids  
Oak Park  
Lansing

September 6, 2024

Brian Trent  
Consumers Energy  
1945 West Parnall Road  
Jackson, Michigan 49201

**RE: Commercial Property**  
**Located at 395 North Mason Street, Mason, Michigan**  
**PM Project No. R242.10061.000.0003**

Dear Mr. Trent,

PM Environmental, Inc. (PM) is providing written notice to public utilities that serve the commercial property located at 395 North Mason Street, Mason, Ingham County, Michigan on behalf of Caledonia Farmers Elevator. This notice is being provided to satisfy the reporting requirements for due care obligations under Rule 1013 of Section 20107(a) of Part 201 of the Natural Resources and Environmental Protection Act (NREPA), P.A. 451 of 1994 (Part 201).

Analytical results from subsurface investigations have identified concentrations of volatile organic compounds (VOCs), nitrogen compounds (nitrate, nitrite, and ammonia), total phosphorous, arsenic, and lead in the soil and/or groundwater samples collected from SB/TMW-1, SB/TMW-2, TMW-4, and TMW-5 above the Part 201 Residential and Nonresidential Drinking Water (DW), Groundwater Surface Water Interface Protection (GSIP), and Groundwater Surface Water Interface (GSI) cleanup criteria. Refer to the attached Figures 3 and 4, and Tables 1, 2, and 3 for additional information regarding the location of the impact. Aside from the locations identified above, additional areas not assessed by PM may be present with elevated contaminant concentrations above Nonresidential cleanup criteria.

All contractors who may work sub-grade on the subject site, including excavation contractors and utility employees, are advised to take appropriate safety precautions when working on the property. 40-Hour hazardous materials safety training, personal protection equipment, and site safety plans may be necessary if working subsurface at the subject site. Soil or groundwater must be characterized prior to movement on the subject property or prior to removal from the subject property. Additional documentation concerning the existing subsurface contamination is available upon request.

Please contact us at 800-313-2966 if you have any questions or require any additional information.

Sincerely,  
PM Environmental, Inc.

Aaron Snow  
Project Scientist

Enclosure



**Corporate Headquarters**  
Lansing, Michigan  
3340 Ranger Road, Lansing, MI 48906  
**f:** 877.884.6775  
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**Michigan Locations**  
Berkley  
Grand Rapids  
Oak Park  
Lansing

September 6, 2024

City of Mason  
Public Works Department  
435 North Jefferson  
Mason, Michigan 48854

**RE: Commercial Property**  
**Located at 395 North Mason Street, Mason, Michigan**  
**PM Project No. R242.10061.000.0003**

To Whom It May Concern:

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Sincerely,  
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Aaron Snow  
Project Scientist

Enclosure



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3340 Ranger Road, Lansing, MI 48906  
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**t:** 517.321.3331

**Michigan Locations**  
Berkley      Oak Park  
Grand Rapids      Lansing

September 6, 2024

Mr. James Scott  
Wide Open West (WOW)  
P.O. Box 360  
Potterville, Michigan 48876

**RE: Commercial Property**  
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**PM Project No. R242.10061.000.0003**

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Project Scientist

Enclosure