



MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY – REMEDIATION DIVISION
 PO BOX 30426, LANSING, MICHIGAN 48909-7926, Phone 517-373-9837, Fax 517-373-2637

Request for DEQ Review of Response Activity Plan

This form is required for submittal of a request for the DEQ to review a Response Activity Plan, under Section 20114b, Part 201, Environmental Remediation, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended.

Type of Response Activity Plan being Submitted:

| | | | |
|---|--------------------------|----------------------------------|--------------------------|
| Remedial Investigation | <input type="checkbox"/> | Site Specific Criteria | <input type="checkbox"/> |
| Evaluation Plan | <input type="checkbox"/> | Mixing Zone | <input type="checkbox"/> |
| Feasibility Study | <input type="checkbox"/> | Section 20118(5) and (6) Request | <input type="checkbox"/> |
| Remedial Action Plan | <input type="checkbox"/> | Institutional Controls | <input type="checkbox"/> |
| Interim Response Plan | <input type="checkbox"/> | Due Care Plan | <input type="checkbox"/> |
| Other, Specify: Baseline Assessment and Response Plan | | | |

Facility Information:

| | | | |
|---|-----------------|------------|--|
| Facility Name: Melching, Inc. | | | |
| Physical Address of Property: 2400 Lakeshore Drive | | | |
| City: Muskegon | State: Michigan | Zip: 49443 | |
| Property Tax ID (include all applicable IDs): 61-24-205-598-0001-00 | | | |

Submitter Information:

| | | | |
|---|---------------------------------------|---|-------------------------------------|
| Entity/person requesting review: Melching, Inc. | | | |
| Contact Person (name and title): Kurt Koella, Lakeshore Environmental, Inc., Senior Project Manager | | | |
| Submitter Address: 2400 Lakeshore Drive | | | |
| City: Muskegon | State: Michigan | Zip: 49443 | |
| Telephone: 616-837-1214 | E-Mail: dougmelching@melchingdemo.com | | |
| Relationship of contact person to the submitter: Environmental Consultant, Authorized Agent | | | |
| Submitter is Owner of the Property | <input checked="" type="checkbox"/> | Submitter is Operator of the Property | <input checked="" type="checkbox"/> |
| Submitter is Not Owner of the Property | <input type="checkbox"/> | Submitter is Not Operator of the Property | <input type="checkbox"/> |
| Owner Name: Doug Melching | Company: Melching, Inc. | | |
| Address: 2400 Lakeshore Drive | City: Muskegon | State: MI | Zip: 49443 |
| E-Mail: dougmelching@melchingdemo.com | | | |
| Telephone: 616-837-1214 | | | |

RECEIVED
 MAY 07 2012
 RRD-MDEQ
 GRAND RAPIDS DISTRICT

Submitter's Consultant Information:

| | | | |
|---|-------------------|--|------------|
| Name: Kurt Koella | | | |
| Title: Senior Project Manager | | | |
| Organization/Company: Lakeshore Environmental, Inc. | | | |
| Consultant Address: 803 VerHoeks Street | City: Grand Haven | State: Michigan | Zip: 49417 |
| Telephone: 616-844-5050 | | E-Mail: kurtk@lakeshoreenvironmental.com | |

Locational Data:

| | | | |
|---|--|-----------------|--|
| County: Muskegon | City/Village/Township: City of Muskegon | | |
| Town: 10N Range: 17W Section: 34, 35 | Quarter: Quarter-Quarter: | | |
| Decimal Degrees Latitude: 43 12' 53.58" N | Decimal Degrees Longitude: 86 18' 20.56" W | | |
| Reference Point for Latitude and Longitude: | | | |
| Center of site | <input type="checkbox"/> | Main/front door | <input type="checkbox"/> |
| Front gate/main entrance | <input type="checkbox"/> | Other | <input checked="" type="checkbox"/> Powerplant Stack |
| Collection Method: | | | |

Request for DEQ Review of Response Activity Plan

Survey GPS Interpolation

The following questions assist DEQ in evaluating the Response Activity Plan Submittal:

Known or Suspected Contaminant(s) Type (Check all that apply):

Petroleum Volatile Organic Compounds Metals Other sulfate, sodium

Current Site Status (Check all that apply):

Undergoing property transfer Active operations Inactive operation

Current Property Use:

Residential/Institutional (including schools, nursing homes, hospitals, etc.)
 Non-residential

Anticipated Property Use:

Residential/Institutional (including schools, nursing homes, hospitals, etc.)
 Non-residential

Estimated Area of Contamination Addressed in Response Action Plan (Cumulative):

Currently undetermined < 0.5 acre > 0.5 acre

Migration:

| | | | |
|--|--------------------------|-------------------------------------|-------------------------------------|
| | Yes | No | Unknown |
| Has contamination migrated beyond the property boundaries? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Has the Notice of Migration been submitted? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Facility Investigation Status:

Ongoing Complete

Facility Response Activity Status (Check all that apply):

None IR Implemented Response Activity Ongoing Response Activity Completed

Drinking Water Supply for Facility (Check all that apply):

Municipal Private Well(s) No Current Water Supply Municipal Available

On-site Well(s) (Check all that apply):

Drinking Water Industrial/Commercial Production Agricultural/Irrigation No well on-site
 Approximate Depth of Well(s): 40 feet. Well was properly abandoned.

Local Drinking Water Supply:

Is facility in a designated Wellhead Protection Area? Yes No
 Distance to nearest off-site drinking water well: >5 miles Private Municipal

Surface Water Bodies on or Adjacent to Facility (Check all that apply):

Wetlands Ditch Stream/River Lake/Pond

Local Surface Water Bodies:

Distance to nearest wetland: Ditch: Stream/River: 2 miles Lake/Pond: Site on Muskegon Lake

Have other plans been submitted for this facility?

Facility Name, if different than this submittal: NA
 Date and Name of most recent submittal:

Facility/Property Subject to (Check all that apply):

| | |
|--|-------------------------------------|
| Consent Agreement or other legal agreement with DEQ | <input type="checkbox"/> |
| Corrective Action under Part 111 or RCRA (Hazardous Waste) | <input type="checkbox"/> |
| Part 115 (Solid Waste) | <input type="checkbox"/> |
| Part 615 (Oil & Gas) | <input type="checkbox"/> |
| Part 201 (Environmental Remediation) | <input checked="" type="checkbox"/> |
| Part 213 (Leaking Underground Storage Tanks) | <input type="checkbox"/> |

Request for DEQ Review of Response Activity Plan

Are/were the following present at the facility (Check all that apply):

| | Current | Previous | Unknown |
|--|-------------------------------------|-------------------------------------|-------------------------------------|
| Free product | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Free phase liquid | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Soil contamination above any residential criteria | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| Soil contamination above any non-residential criteria | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| Soil aesthetic impacts | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Groundwater contamination above any residential criteria | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Groundwater contamination above any non-residential criteria | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Groundwater contamination above the Acute Inhalation Screening Level | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Groundwater aesthetic impacts | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Soil Gas contamination above residential screening levels | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Soil Gas contamination above non-residential screening levels | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Conditions immediately dangerous to life or health (IDLH) | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Fire & Explosion hazards related to releases | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Contamination existing in drinking water supply | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Imminent threat to drinking water supply | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Environmental Media Known to be Affected:

| | Current | Previous | Unknown |
|-------------------------|-------------------------------------|-------------------------------------|-------------------------------------|
| Soil | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| Groundwater | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Soil Vapor | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Surface Water | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Surface Water Sediments | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Environmental Professional Signature:

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

Signature: *Kurt Koella*

Date: *5-4-12*

Printed Name: Kurt Koella

Company of Environmental Professional: Lakeshore Environmental, Inc.

Address: 803 VerHoeks Street

City: Grand Haven

State: Michigan

Zip: 49417

Telephone: 616-844-5050

E-mail address: kurtk@lakeshoreenvironmental.com

Submitter Signature:

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

Signature: *Doug Melching (LCC)*

Date: *5-4-12*

Printed name: Doug Melching

Title/Relationship of signatory to submitter: President

Address: 2400 Lakeshore Drive

City: Muskegon

State: Michigan

Zip: 49443

Telephone: 616-837-1214

E-Mail address: dougmelching@melchingdemo.com

This form and the response activity plan should be submitted to the DEQ Remediation Division District Office unless the response activity is related to a facility that is regulated by another DEQ Division. If regulated by another division, contact should be made with that division for information on where to submit the form and plan.

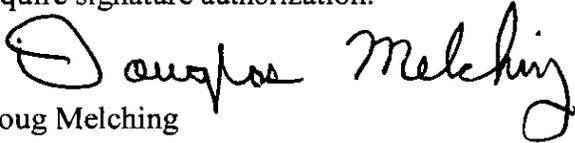
April 16, 2012

Doug Melching, *Melching Inc.*
Melching Demolition & Dismantling
16942 Woodlane Drive
Nunica, MI 49448

Re: Agent Authorization

Michigan Department of Environmental Quality:

I have provided this letter to formally authorize Kurt C. Koella of Lakeshore Environmental, Inc., Grand Haven, Michigan, to act on my behalf with respect to any environmental issues that pertain to your regulatory authority. This specifically includes, but is not limited to, permitting activities that require signature authorization.

A handwritten signature in black ink that reads "Doug Melching". The signature is written in a cursive style with a large, stylized initial "D".

Doug Melching
President



Baseline Assessment and Response Plan

**Melching, Inc.
2400 Lakeshore Drive
Muskegon, Michigan**

*Formerly:
Sappi Fine Paper
DEQ Facility ID No. 61000359:
GW1810237*

PREPARED FOR:

Michigan Department of Environmental Quality
350 Ottawa Ave., NW, Unit 10, Grand Rapids, Michigan 49503

May 2012

*Lakeshore Environmental, Inc. Project Number:
10-339*



Western Michigan Office:
803 VerHoeks Street
Grand Haven, Michigan 49417
P: 616-844-5050 F: 616-844-5053
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Western Michigan

Mid-Michigan

Northern Ohio

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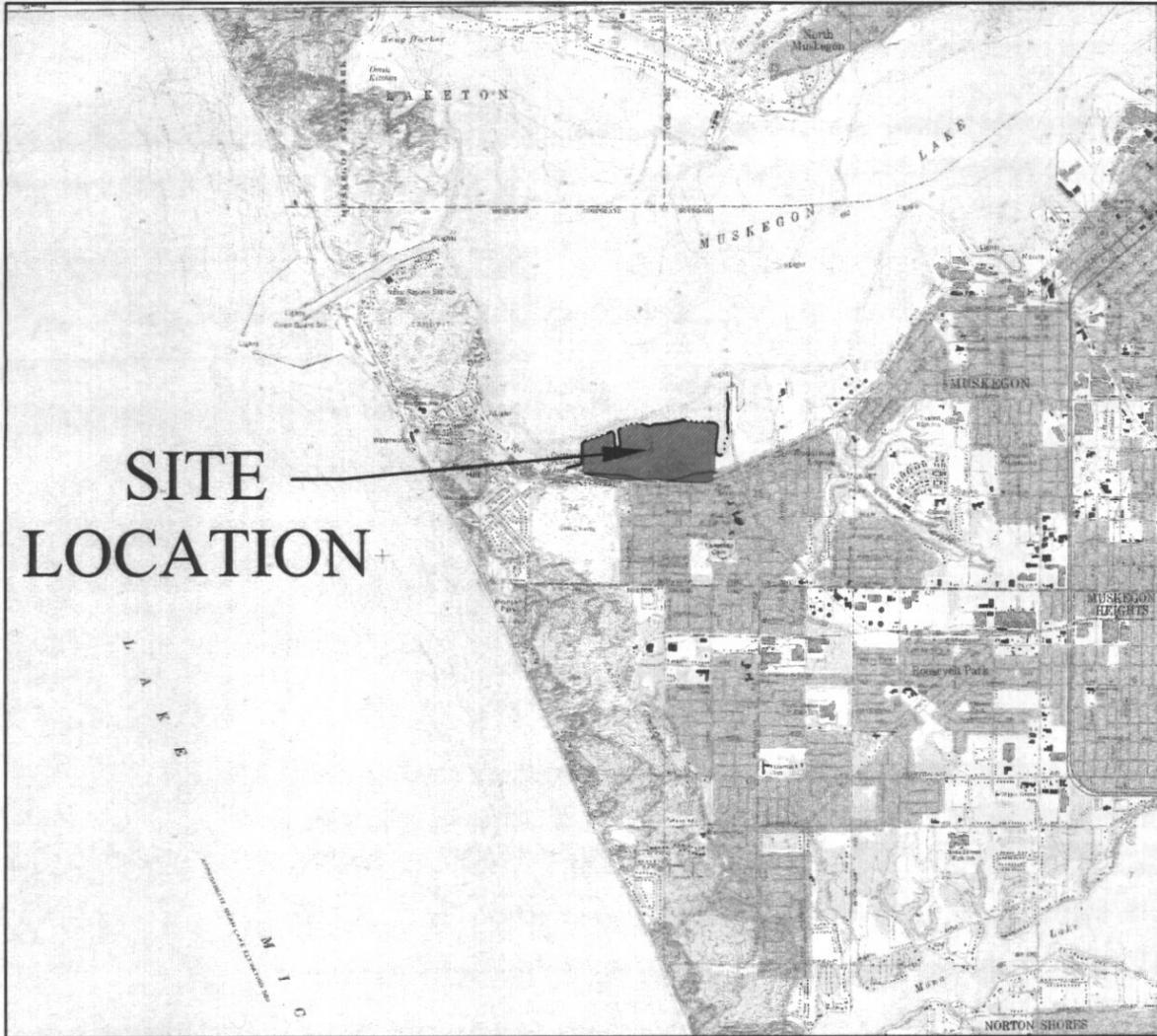
| | |
|------------|--|
| Appendix A | Soil Boring Logs and Summary Table |
| Appendix B | Hydraulic Conductivity Testing Data |
| Appendix C | DEQ Items of Concern |
| Appendix D | Storm Water Retention Basin Testing Data |
| Appendix E | Analytical Data for Groundwater/GSI Sampling |
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1.0 Introduction/Objective

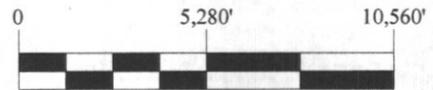
The Melching, Inc. (Melching) property is located at 2400 Lakeshore Drive, Muskegon, Michigan (Figure 1). Melching purchased the property (herein referenced as the Site) from S.D. Warren Company dba Sappi Fine Paper (Sappi) on August 25, 2011. Melching took occupancy and began moving their base of operations to the Site on August 31, 2011. Demolition activities were initiated on September 28, 2011. Prior to purchase by Melching, Sappi filed deed restrictions relating to the use of the Site, presumably for risk management purposes. These deed restrictions applied in varying degrees to both the Site as a whole (to the extent located north of Lakeshore Drive), and to seven specific areas within the Site where Sappi believed there was a potential for environmental degradation or where closure of past releases had occurred.

On January 26, 2012, the Michigan Department of Environmental Quality (DEQ) issued a Violation Notice to Sappi regarding releases at the Sappi (former SD Warren) paper mill. Sappi forwarded the letter to Melching on January 30, 2012. The DEQ letter requested a written commitment from Sappi to address the releases that the DEQ had identified. A meeting was held on March 22, 2012, with representatives of the DEQ, Sappi, and Melching to discuss environmental liability and to formulate a strategy to address outstanding issues. During the meeting, it was agreed that Melching is the party that will respond to the DEQ concerns, and that on or before May 4, 2012, Melching would: 1) submit a status report with a conceptual site model and work plan, and 2) conduct a site tour for DEQ staff.

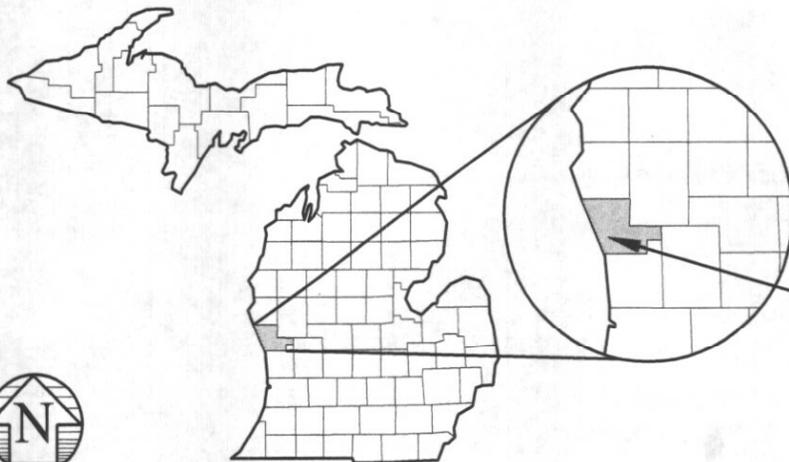
The objective of this report, titled "Baseline Assessment and Response Plan" is to fulfill the May 4, 2012 commitment to provide a status report with conceptual site model and work plan. A comprehensive site tour with DEQ District Remediation Division staff was completed on April 24, 2012, and on April 26, 2012, DEQ Director Wyant, Remediation Division Acting Chief Couture, and District Air Quality and Remediation Division Staff toured the site.



USGS TOPO 7.5 QUAD
MUSKEGON WEST, MICH 1980



SCALE: 1" = 1/2 MILE



NE 1/4 SECTION 34, & NW 1/4
SECTION 35, T10N, R17W,
CITY OF MUSKEGON,
MUSKEGON COUNTY,
MICHIGAN



**Lakeshore
Environmental, Inc.**
Scientists | Engineers | Planners

SITE LOCATION MAP

61-24-205-598-0001-00

2400 LAKSHORE DRIVE
MUSKEGON, MI 49441

JOB 10-339-01

APRIL 2012

FIGURE 1

2.0 Conceptual Site Model (Hydrogeology)

2.1 General Geologic Setting

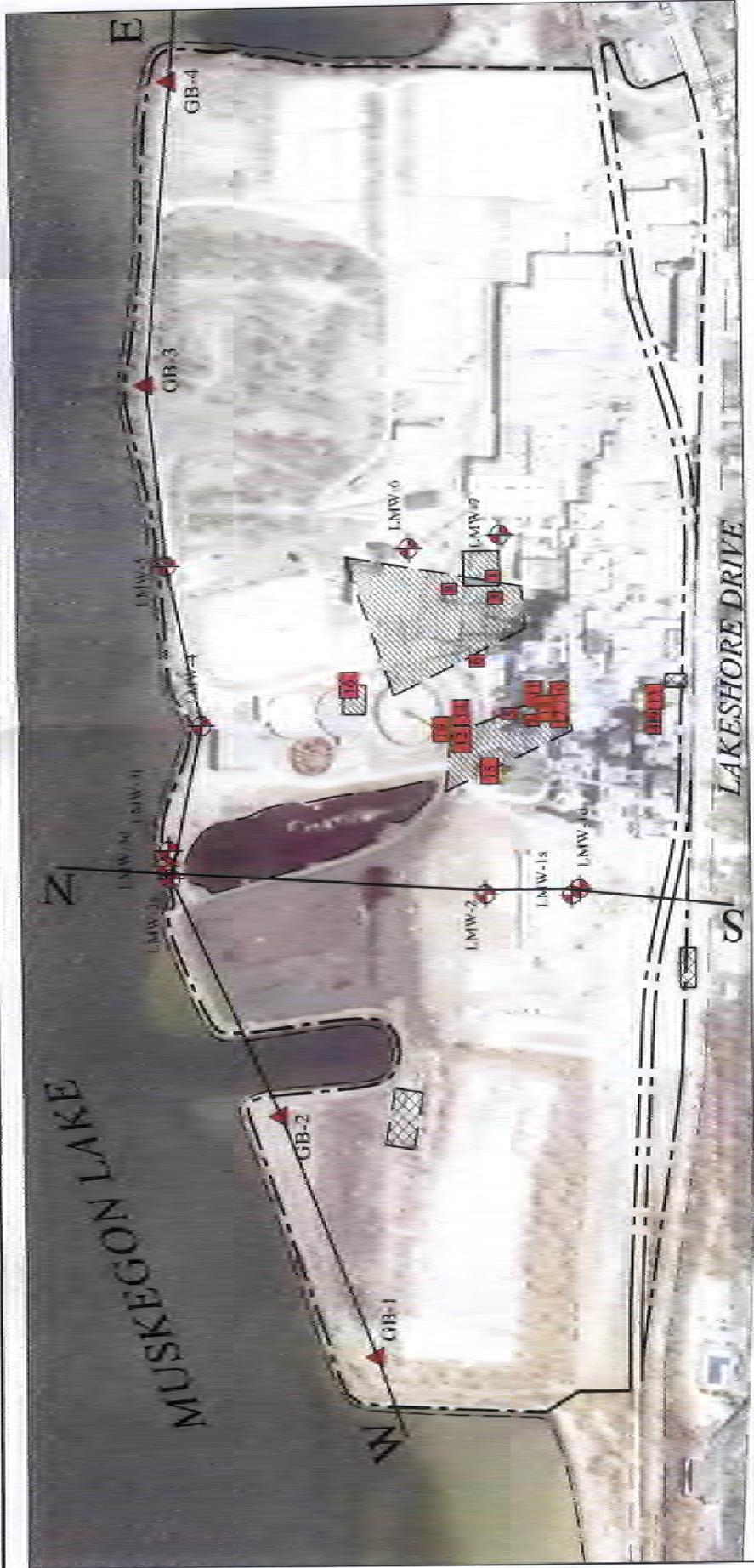
The Melching site is located on the south shore of Muskegon Lake in a physiographic region known as the Michigan Lake Border Plain, which is characterized by land of low relief and low altitude. The low relief and altitude are the result of glacial erosion followed by post glacial deposition of lacustrine (lake) clay and sand in several large glacial lakes. While dune sand is present along the Lake Michigan shoreline west of the site, none is present at the site. In general, the stratigraphy below the south shore of Muskegon Lake is composed of approximately 5 to 45 feet of lacustrine sand deposited primarily in glacial Lake Nipissing (4,000 years ago). Approximately 130 feet of lacustrine clay (with occasional thin layers of sand) is present below the sand that was deposited primarily in the bottom of glacial Lake Chicago (Calumet Phase 11,200 to 11,800 years ago). Below the extensive clay deposit is approximately 15 feet of glacial till (a gravel, silt, and clay mixture) from the advance and retreat of the Lake Michigan Lobe of the Wisconsin glacier (13,000 to 30,000 years ago). Sandstone bedrock is present below the till, at a total depth of 200 feet below the present ground surface, which represents the land surface prior to the arrival of the most recent glacier.

Though not geologic in origin, the south shore of Muskegon Lake was historically filled with lumbering wastes in the 1800's, followed in certain areas with other fill from unknown sources in the 1900's. In fact, the first known use of the Site was Rogers Sawmill in 1874.

2.2 Site Stratigraphy

To determine the site stratigraphy, Lakeshore completed 11 soil borings at select locations to prepare geologic cross sections. The borings were completed utilizing direct push methods (Geoprobe) and continuous core samples were collected for evaluation. The location of these soil borings is provided in Figure 2 (Soil Boring and Monitoring Well Location Map). The soil boring logs are provided in Appendix A. Figure 3 (East to West Geologic Cross Section) illustrates the site stratigraphy along the north margin of the site adjacent to Muskegon Lake. A review of Figure 3 reveals the stratigraphy consists of 15 to 16 feet of fill material composed primarily of dark brown sand in the east grading to sand, wood, and lime in the west. The fill sand does not appear to be spent foundry sand. The fill sand does contain trace amounts of wood, gravel, coal, lime, and brick. A two to three foot thick layer of wood and peat is located below the fill sand that likely represents the former bottom of Muskegon Lake prior to filling. A 12 to 35 foot thick layer of gray fine sand with shells is located below the wood and peat. Gray clay (with varves) is located below the fine sand layer, with the top of the clay sloping from 30 feet in depth in the east to 52 feet in depth in the west.

Figure 4 (North to South Geologic Cross Section) illustrates the stratigraphy through the central portion of the site. In the south (LMW-1) the stratigraphy consists of 8 feet of densely compacted wood chips above 4 feet of sand fill with bricks. A one foot layer of wood and peat is then encountered. Light brown fine sand (natural) extends from the peat to 49 feet in depth, at which point dense gray clay is encountered. Although no borings were completed farther south of LMW-1 (in the vicinity of the railroad tracks), the soils are reported to be natural sand (Roscommon and AuGres) to the depth of clay. In the north, directly north of the stormwater retention basin (former surge basin) the subsurface was found to consist of 18 feet of brown fill sand, one (1) foot of wood and peat, then 32 feet of gray fine sand. Soft gray clay was encountered at a depth of 51 feet.



LEGEND

- LMW-5
- GB
-
-
-
-

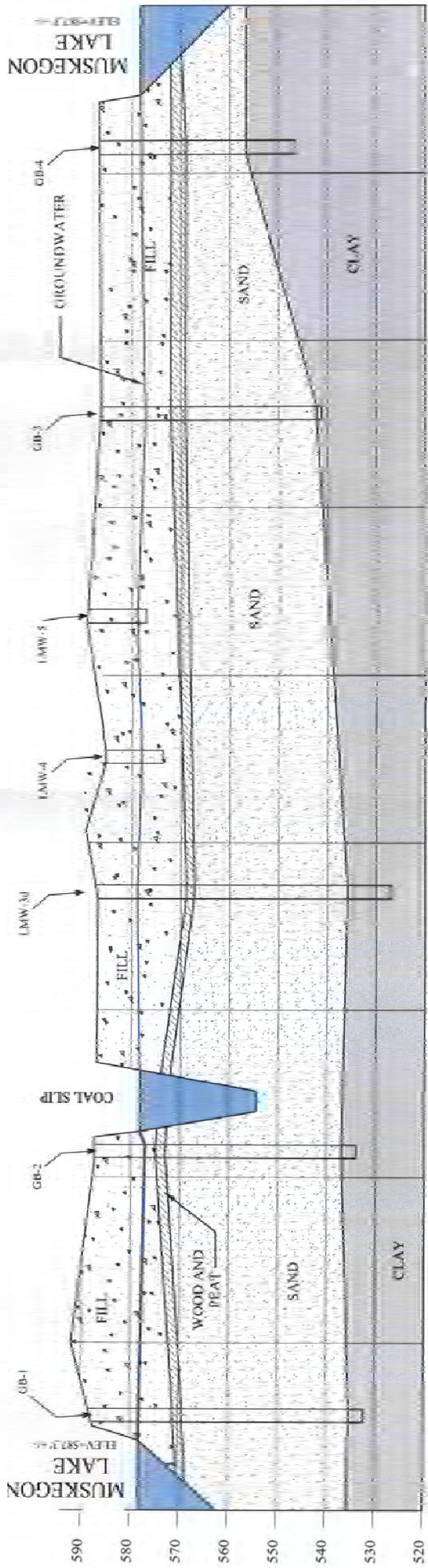


SOIL BORING AND MONITORING WELL LOCATION MAP

2400 LAKESHORE DRIVE
MUSKEGON, MICHIGAN

JOB #: 05-139-01 MAY 2012 FIGURE 2





W

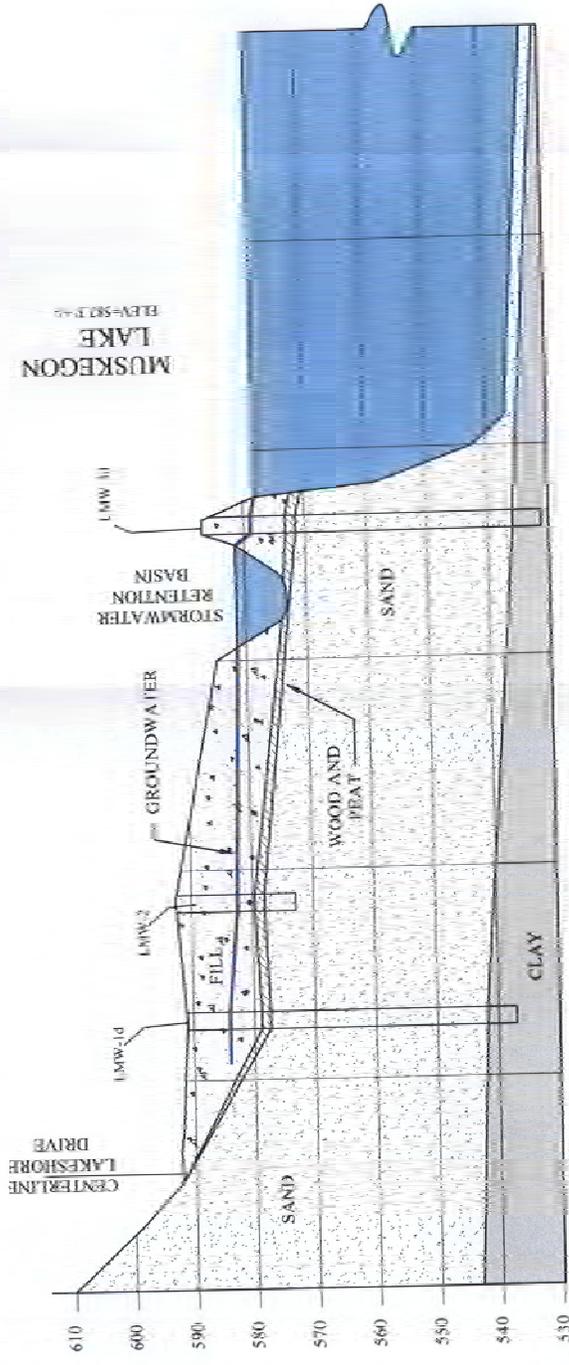
HORIZONTAL SCALE: 1" = 300'
 VERTICAL SCALE: 1"=20'
 15X EXAGGERATION

E



CROSS SECTION
 EAST-WEST
 2400 LAKESHORE DRIVE
 MUSKEGON, MICHIGAN
 JOB # 10-330
 MAY 2012

FIGURE 3



N

S

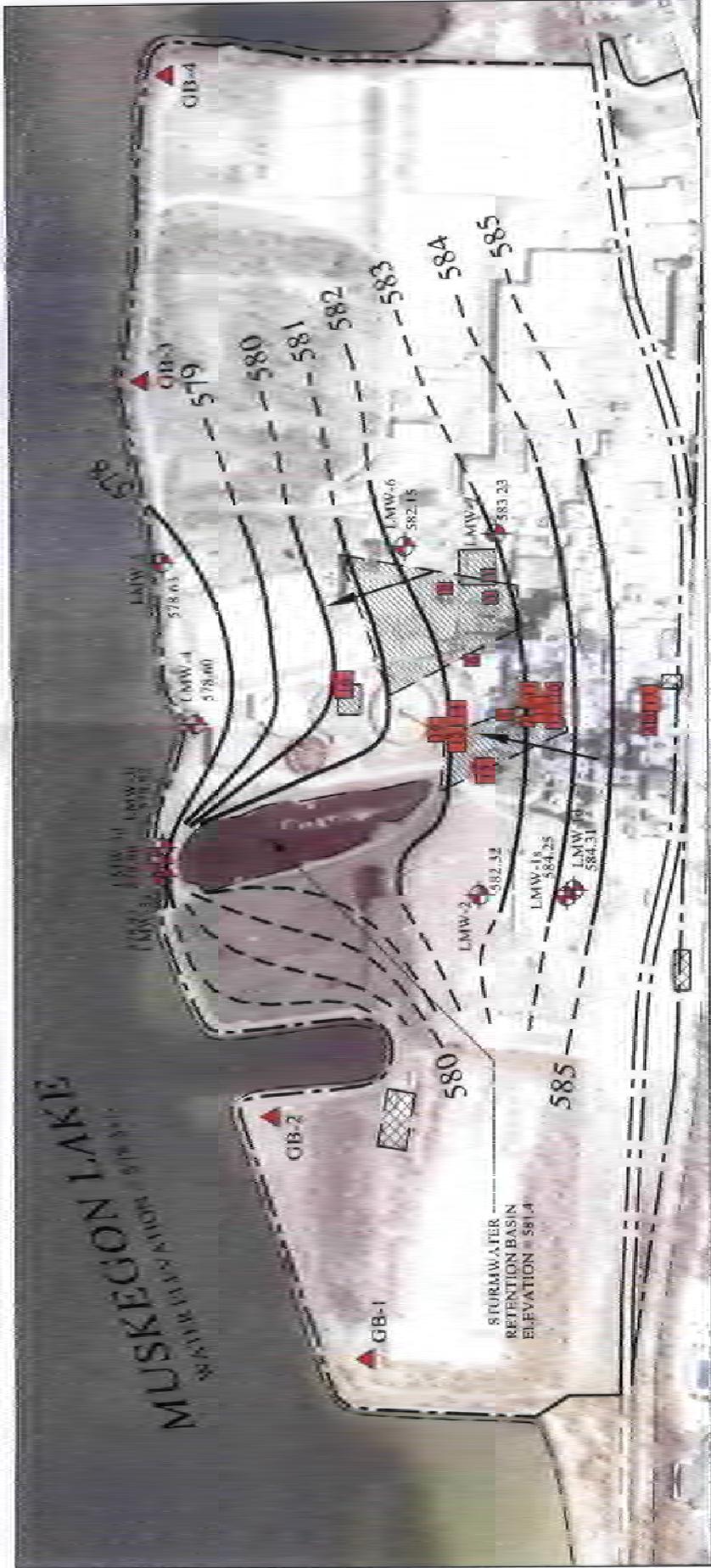
HORIZONTAL SCALE: 1" = 300'
 VERTICAL SCALE: 1" = 20'
 15X EXAGGERATION



CROSS SECTION
 NORTH-SOUTH
 2400 LAKESHORE DRIVE
 MUSKIEGON, MICHIGAN



JOB # 10-339 MAY 2012 FIGURE 4



LAKESHORE DRIVE

LEGEND

- LMW-5
- 578.63
- GB
- 578
-
-
- MDEQ AREAS OF CONCERN
- DIRECTION OF GROUNDWATER FLOW

- MONITORING WELL
- GROUNDWATER ELEVATION
- GEOLOGICAL BORING
- GROUNDWATER ELEVATION CONTOUR
- RESTRICTED AREAS
- CLOSED RESTRICTED AREAS
- MDEQ AREAS OF CONCERN
- DIRECTION OF GROUNDWATER FLOW

STORMWATER RETENTION BASIN ELEVATION = 581.4



GROUNDWATER ELEVATION CONTOUR MAP
 2400 LAKESHORE DRIVE
 MUSKEGON, MICHIGAN

JOB # 10-339-01 MAY 2012 FIGURE 5