981023



The Dow Chemical Company Midland, MI 48674

March 28, 2023

Ms. Colleen Moynihan Remediation Project Manager U.S. Environmental Protection Agency, Region 5 Cleveland Office 25063 Center Ridge Road Westlake, OH 44145

Re: Revised Advisory Sign Survey and Inventory Tech Memorandum Settlement Agreement No. V-W-10-C-942 The Tittabawassee River/Saginaw River and Bay Site Dow Submittal Number: 2023.011

Ms. Moynihan:

Attached please find the revised Advisory Sign Survey and Inventory Tech Memorandum (Tech Memo). This Tech Memo was developed in accordance with Settlement Agreement No. V-W-10-C-942 (2010 AOC). Please let me know if you have any questions or concerns.

Sincerely,

James F. Strunk, Jr. Authorized Representative The Dow Chemical Company Project Coordinator

CC: Daniel Dailey, EGLE Diane Russell, U.S. EPA Lisa Williams, U.S. Fish and Wildlife

ADVISORY SIGN SURVEY AND INVENTORY TECHNICAL MEMORANDUM



Prepared by: Tittabawassee and Saginaw River Team

Prepared for and submitted by: The Dow Chemical Company

> March 2023 Rev 1

Dow Submittal Number: 2023.011

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Acronyms and Abbreviations

AOC	Administrative Settlement Agreement and Order on Consent
DU	decision unit
EGLE	Michigan Department of Environment, Great Lakes, and Energy
GDIWP	General Design and Implementation Work Plan
ICS	incremental composite sampling
IRA	Interim Response Activities
ppt	parts per trillion
SOW	Statement of Work
SWAC	surface-weighted average concentration
TEQ	toxic equivalence
USEPA	United States Environmental Protection Agency

1 Introduction

This technical memorandum was prepared in accordance with the *Administrative Settlement Agreement and Order on Consent* (AOC; USEPA 2010) for The Tittabawassee River/Saginaw River & Bay Site ("Site") (Settlement Agreement No. V-W-10-C-942), and Section 3 of the Statement of Work (SOW; Attachment A of AOC), effective January 21, 2010 ("Settlement Agreement") (2010 AOC). The United States Environmental Agency (USEPA) requested that The Dow Chemical Company (Dow) conduct a survey to inventory soil advisory signage present at public parks and areas where the public may be accessing the Tittabawassee River. This technical memorandum summarizes the results of the survey.

2 Background

Interim Response Activities (IRAs) have been conducted since 2004 for the Tittabawassee River Floodplain under the regulatory authority of Part 111, Hazardous Waste Management, of the Natural Resources and Environmental Protection Act, 1994 PA 451 as amended, as required by Dow's Hazardous Waste Management Facility Operating License. An IRA activity was conducted with the primary objective to develop, place, and maintain signs advising the public of the potential for exposure to dioxins and furans at public parks, unofficial public high use areas and public access fishing sites. The advisory signs were placed prior to a comprehensive sampling effort on the Tittabawasee River from 2006 to 2009 and the development of preliminary remedial goals by USEPA and EGLE. Parks that were identified by Michigan Department of Environment, Great Lakes, and Energy (EGLE, formerly Michigan Department of Environmental Quality) for the placement of signs include Imerman Memorial Park, West Michigan Park, Freeland Festival Park, Caldwell Boat Launch, Center Road Boat Launch, Greenpoint Nature Center, and Shiawassee National Wildlife Refuge. EGLE has also identified "unofficial high public use" areas for placement of signs, including Dice Road pumping station, Smith's Crossing area, Dow-owned property along the Tittabawassee River that is accessible for fishing, and the former Germania Golf Course. The signs were intended to inform the public of potentially contaminated media (e.g., sediments, soils, fish) in areas that are used by the public. These signs were developed by EGLE and Michigan Department of Health and Human Services and are intended to provide simple, clear and accurate information that would allow the public to make informed personal decisions regarding potential exposure to existing contamination while the investigations and cleanups were initiated by Dow and USEPA.

Following the 2010 AOC, advisory signs and community education transitioned to USEPA oversight under Task 3 of the SOW. As a result, USEPA requested that Dow conduct an inventory of advisory signage for the Tittabawassee River in public parks and public use areas.

3 Summary of Floodplain Evaluation of Public Use Areas

All public parks and public use areas along the Tittabawassee have been evaluated under the 2015 Floodplain AOC. The properties were evaluated under the Segment-Specific Work Plans for each floodplain segment.

3.1 Inventory and Location of Advisory Signs

The public park/public use areas identified in the IRA Work Plan are listed below along with the segment location and property identification number.

- Public Parks
 - Caldwell Boat Launch, Segment 2 (S2_02_DU02)
 - Freeland Festival Park, Segment 3 (S3_095_DU01)
 - o Imerman Memorial Park, Segment 5 (S5_02-03_DU01 through DU04)
 - West Michigan Park, Segment 7 (S7_001_DU01)
 - Center Road Boat Launch, Segment 7 (S7_025_DU01)
 - Greenpoint Nature Center, Segment 7 (S7_056_DU01 through 04)
 - Shiawassee National Wildlife Refuge, Segment 7 (S7_120-123_DU01 through DU25)
- Other public use areas
 - Dow-owned property along the Tittabawassee River that is accessible for fishing, Segment 2 (S2_01_DU01)
 - Smith's Crossing area, Segment 2 (S2_10-13_DU01 through DU21)
 - Dice Road pumping station, Segment 4 (S4_111_DU01)
 - Former Germania Golf Course, Segment 7 (S7_051a_DU01 though DU04)

Signs were also located in additional locations beyond those identified in the IRA Work Plan. All areas where advisory signs were located are included in Table 1 and shown on Figures 1 through 8. A summary of the results of the evaluation for each public use area is provided in Appendix A along with the Tittabawassee River Floodplain Evaluation Flow Chart.

3.2 Inventory and Results

In November and December 2021 Dow conducted a survey to identify the locations and types of advisory signs present in public use areas along the Tittabawassee River. Areas surveyed included public parks and known public use areas which were identified during IRA activities. The survey was conducted during leaf off conditions so that the signs could be located easier. Each location was visited, and a survey was conducted by foot to locate advisory signs. A summary of the location and sign types is provided in Table 1 and depicted on Figures 1 through 8. During the survey it was noted that contact information currently present on the advisory signs is out of date.

3.3 Results of Evaluation under the 2015 Floodplain AOC

The General Design and Implementation Work Plan (GDIWP) (Dow 2015) established a set of decision rules for the assessment and remediation process for floodplain properties. Decisions are based on current land use (i.e., maintained residential or other), and land use was (and continues to be) verified as part of the process. Decision Units (DUs, i.e., areas where individual remedial decisions are made) are assigned for each property based on its land use and area. A surface-weighted average concentration (SWAC) based on existing data is then estimated for each DU to determine whether additional sampling is required. A DU is further evaluated by incremental composite sampling (ICS) if its SWAC is greater than 90 parts per trillion toxic equivalence [ppt TEQ] for maintained residential land use or 1,600 ppt TEQ for other land use. Remedy is completed on a DU if the ICS result is greater than 200 ppt TEQ (maintained residential land use).

All properties identified in this Tech Memo were evaluated following the GDIWP. All properties were classified as other land use. None of the properties required sampling or cleanup as outlined in the GDIWP. Appendix A provides the Tittabawassee River Floodplain Evaluation Flow Chart, a table summarizing the results of the evaluation, and figures depicting the properties and associated DUs.

4 Summary and Recommendations

The results of the survey identified soil contact advisory signs within most of the public access areas. All the public access areas along the Tittabawassee River have been evaluated under the 2015 AOC for the Tittabawassee Floodplain. Results of those evaluations have not identified any public access areas within the Tittabawassee River floodplain that require floodplain remedy. Based upon those evaluations, Dow recommends that soil contact advisory signage should be removed from public access areas. Dow will work with the USEPA to develop a communication strategy for communicating with the municipalities regarding these changes to advisory signs in public parks.

5 References

Dow. 2015. Tittabawassee River Floodplain General Design and Implementation Work Plan. June 15, 2015.

- USEPA. 2010. Administrative Settlement Agreement and Order on Consent for Remedial Investigation, Feasibility Study and/or Engineering Evaluation and Cost Analysis, and Response Design. CERCLA Docket No. V-W-10-C-942. The Tittabawassee River/Saginaw River and Bay Site. Effective Date: January 21, 2010.
- USEPA. 2015. Administrative Settlement Agreement and Order on Consent for Removal Action. CERCLA Docket No. V-W-15-C-018. Tittabawassee River Eight-Year Floodplain of the Tittabawassee River, Saginaw River and Bay Site. Effective Date: January 8, 2015.

Table 1. Advisory Sign Survey-Tittabawassee River

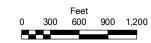
Location	Date Observed	Sign Observed	Sign Condition	Photo Number	Notes	Coordinates (X, Y)		
Fishing Area upstream of Reach	12/2/2021	Soil Advisory (white)	fair	4448	N/A	-84.20531382	43.57932462	
JK		Fish Advisory	fair	4449		-84.20531172	43.57925144	
		Soil Advisory (white)	fair	4450		-84.20432392	43.57574341	
		Fish Advisory	good	4451	N/A	-84.20432718	43.57573327	
Reach JK	12/2/2021	Soil Advisory (white)	fair	4452		-84.20435962	43.57504406	
Reduit JK	12/2/2021	Fish Advisory Contaminated soil	fair	4453		-84.2043556	43.57504746	
		Authorized Personnel Only	good	4454	There were multiple of these signs posted on containment fence - fence is falling over	-84.2032175	43.57387881	
		Soil Advisory (white)	poor	4455	N/A	-84.19613396	43.57194129	
		Fish Advisory	poor	4456		-84.19615231	43.57188157	
Caldwell Boat		Soil Advisory (white)	fair	4457	During leaf on, sign may be more hidden	-84.19594687	43.5718975	
Launch	12/2/2021	Fish Advisory	fair	4458 4459	During leaf on, sign may be more hidden	-84.19541068 -84.19512344	43.57145083 43.57030531	
Launch		Fish Advisory Soil Advisory (white)	good fair	4459	•	-84.19512344	43.57030531	
		Fish Advisory	fair	4460	N/A	-84.19559726	43.57032514	
		Fish Advisory	good	4462		-84.19521924	43.57023562	
Smith's Crossing	12/2/2021	None	NA	NA	NA	NA	NA	
area	12/2/2021	Fish Advisory	good	4463		-84.12702005	43.5253359	
		Fish Advisory	good	4463	N/A	-84.12702003	43.52535199	
Freeland Festival	12/2/2021	Soil Advisory (white)	poor	4464		-84.12709842	43.52691019	
Park	,_,	Fish Advisory	poor	4466	Sign in decent condition but posted far from any parking lot or traffic area	-84.12875997	43.52695411	
Dice Rd Pumping Station	12/2/2021	Fish Advisory	good	4467	N/A	-84.09617842	43.46594957	
		Soil Advisory (white)	good	4468	N/A	-84.07902083	43.45837137	
		Soil Advisory (blue) TR remediation and	good good	4469 4470-4471	Unsure if phone numbers are accurate	-84.07880131 -84.07872009	43.45847895 43.45853268	
		bank restoration Soil Advisory (white)	good	4472		-84.07897021	43.45874445	
		Soil Advisory (white)	good	4473		-84.0790158	43.45777676	
		Soil Advisory (white)	good	4473		-84.07718285	43.45735515	
Imerman	12/2/2021	Soil Advisory (white)	good	4475		-84.08137389	43.45352814	
Memorial Park	12/2/2021	Soil Advisory (white)	good	4476		-84.08156952	43.45347261	
		Fish Advisory	good	4477	N/A	-84.08174001	43.45341708	
		Soil Advisory (white)	good	4478		-84.081882	43.45344842	
		Soil Advisory (white)	good	4479		-84.08185006	43.45366497	
		Soil Advisory (white)	good	4480		-84.0816561	43.45557663	
		Fish Advisory Soil Advisory (white)	good good	4481 4482	•	-84.08177882 -84.08170363	43.45750476 43.45767047	
		Fish Advisory	good	4482		-84.08170303	43.45786196	
		Soil Advisory (white)	good	4483		-84.04618037	43.43750395	
Fishing spot at		Fish Advisory	good	4485		-84.04632135	43.43743995	
State and 47	12/2/2021	Soil Advisory (white)	good	4486	N/A	-84.04624256	43.43749159	
bridge		Fish Advisory	good	4487		-84.04628028	43.43767565	
		Soil Advisory (white)	good	4488		-84.04839646	43.43733266	
Thomas Township welcome center	12/2/2021	Fish Advisory	good	4489	N/A	-84.04647022	43.41632321	
		Soil Advisory (white)	good	4490		-84.02911808	43.40214204	
		Fish Advisory	good	4491		-84.02913946	43.40214271	
		Soil Advisory (white)	good	4492	4	-84.029047	43.40140125	
		Fish Advisory	good	4493		-84.02905849	43.40137619	
West Michigan	12/2/2024	Soil Advisory (white)	good	4494	N/A	-84.02905983	43.40137912	
Park	12/2/2021		4	-84.02906142	43.40137661 43.40138763			
		Soil Advisory (white) Fish Advisory	good	4496 4497	4	-84.02905698 -84.02905698	43.40138763	
		Soil Advisory (blue)	good fair	4497	1	-84.02905698	43.40138763	
		Soil Advisory (bide)	poor	4498	Near railroad tracks. Sign falling off post	-84.03202903	43.40281331	
		Fish Advisory	poor	4500	Near railroad tracks. Sign hidden	-84.03181219	43.40274713	
		Soil Advisory (white)	fair	4501		-84.01734662	43.39526456	
		Fish Advisory	good	4502		-84.01741913	43.39519403	
Center Rd Boat	12/2/2021	Fish Advisory	good	4503		-84.01761652	43.39486349	
Launch	16/2/2021	Soil Advisory (white)	good	4504	170	-84.01734595	43.39469485	
		Fish Advisory	good	4505	4	-84.01689442	43.39456723	
		Soil Advisory (blue)	good	4506		-84.01574853	43.39468676	
Freeland Memorial Park	12/14/2021	TR remediation and bank restoration	fair	4507	N/A	-84.1240371	43.52334776	
Germania Golf Course/SWNR	12/14/2021	Fish Advisory	good	4508	West side of road down walkway	-83.98572841	43.39515049	
Greenpoint Nature	12/14/2021	Fish Advisory	good	4509	N/A	-83.98377257	43.39248118	
Center	14/14/2021	Soil Advisory (yellow)	good	4510	17/15	-83.98410877	43.3922783	

Sign condition:

good: Sign is in good condition, is legible, and clearly posted fair: Sign has minor defects, fading, or is partially hidden poor: Sign is illegible, out of sight, or in non-working order



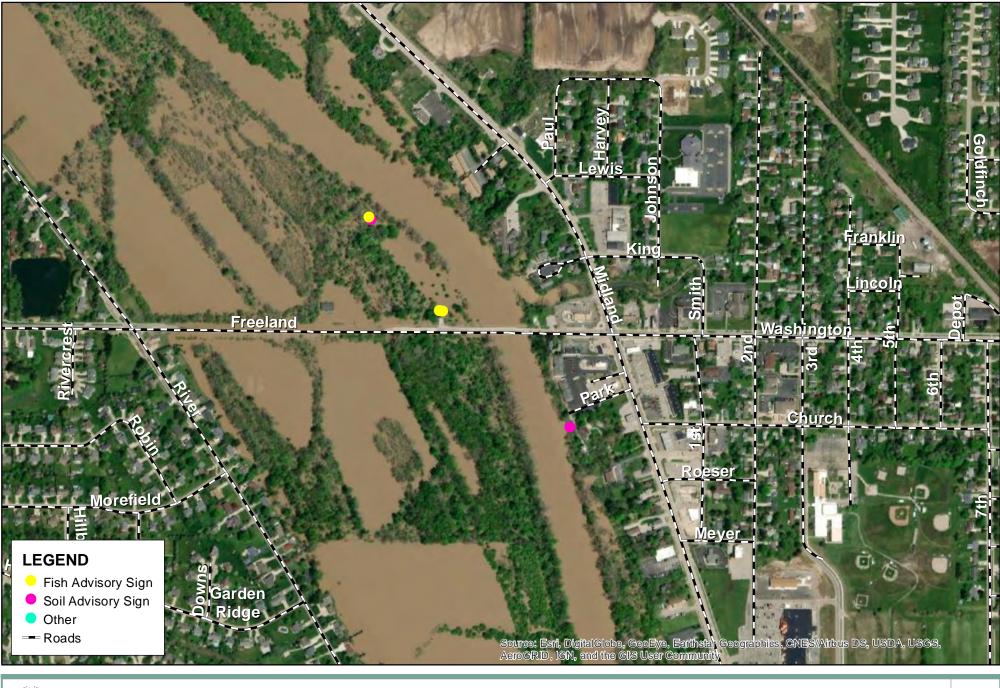




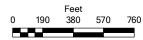
Reach JK and Caldwell Boat Launch Advisory Sign Inventory Tech Memo

Figure

1



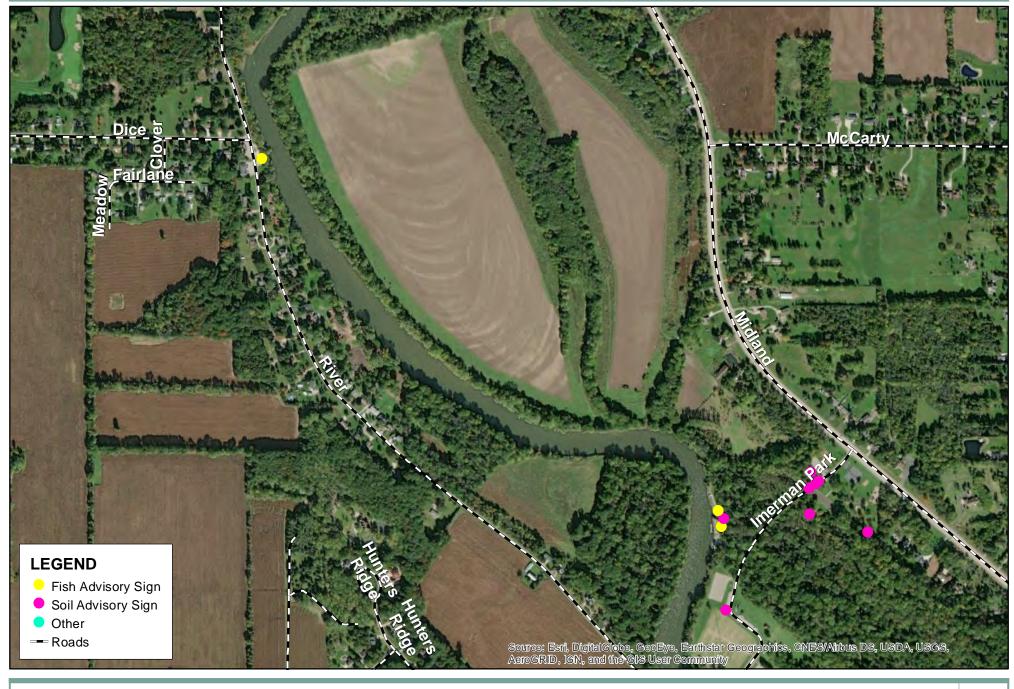


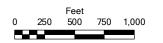


Freeland Festival Park Advisory Sign Inventory Tech Memo

Figure

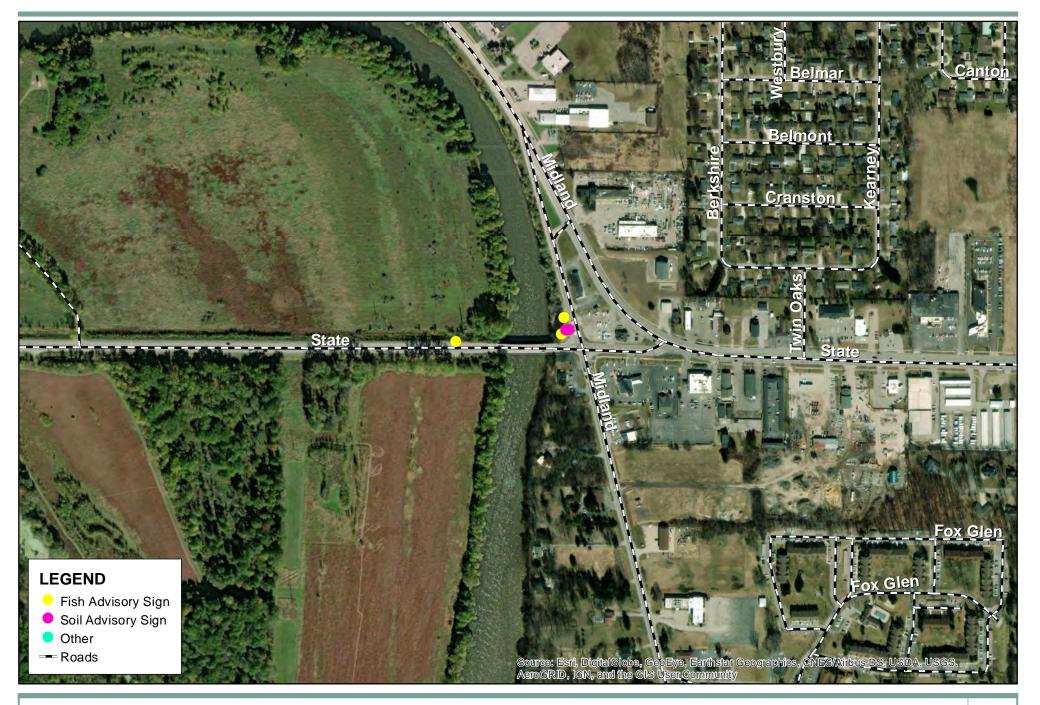
2



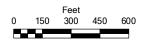


 Imerman Park and Dice Road Pump Station
 Figure

 Advisory Sign Inventory Tech Memo
 3



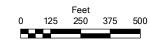




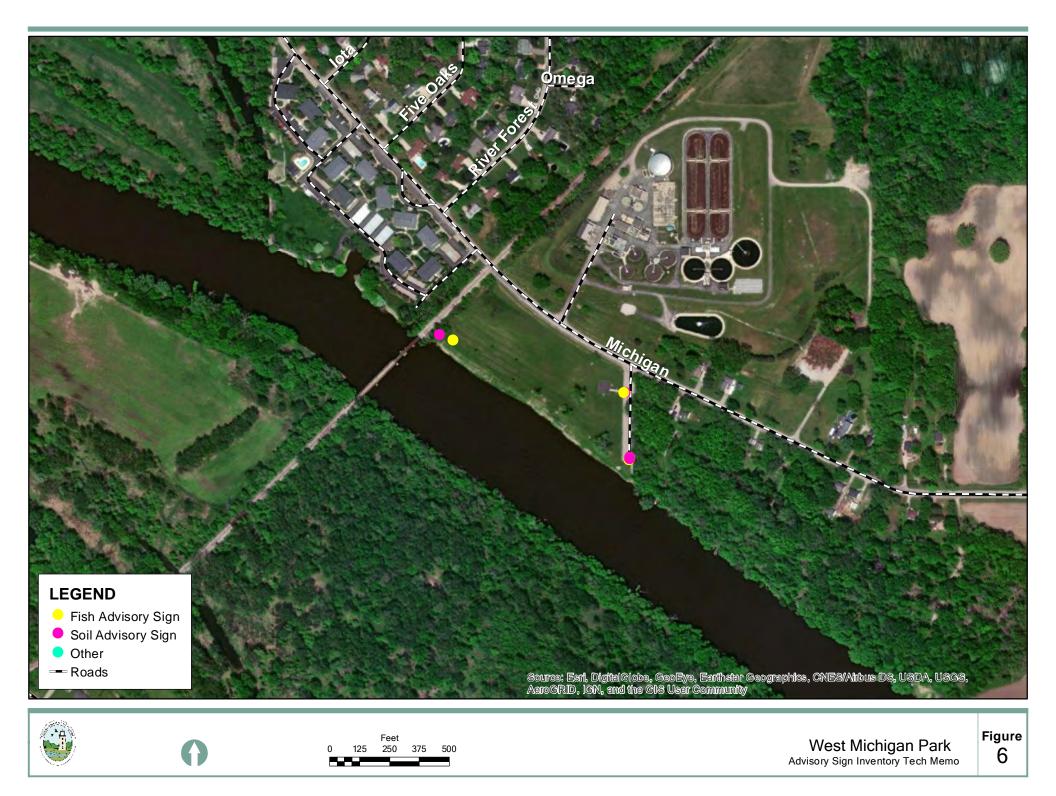
State Street and M47 Fishing Spot Advisory Sign Inventory Tech Memo





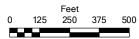


Thomas Township Welcome Center Advisory Sign Inventory Tech Memo







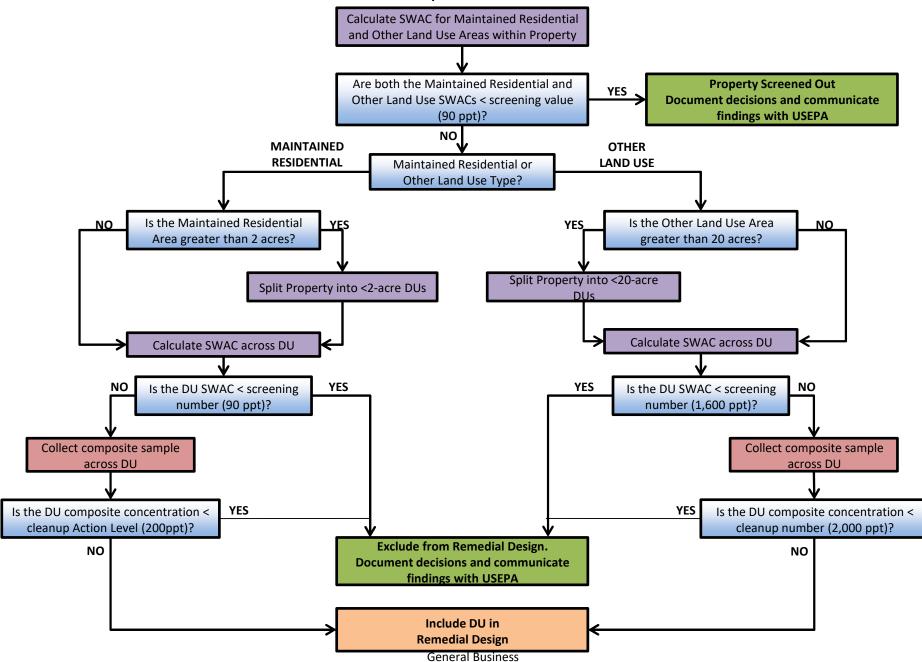


Figure

7



Tittabawassee River Floodplain Evaluation Process



Appendix A
Summary of Public Use Area Floodplain Evaluation

Property ID	DU ID	Maintained or Other?	DU Area (acres)	Curren	t DU Concentration (ppt TEQ) ¹
SEGMENT 2					
S2_01	S2_01_DU01	Other	0.82	57	(SWAC)
S2_02	S2_02_DU02	Other	2.18	232	(ICS Result)
S2_10-13	S2_10-13_DU01	Other	20.07	622	(SWAC)
S2_10-13	S2_10-13_DU02	Other	20.06	1,101	(SWAC)
S2_10-13	S2_10-13_DU03	Other	20.09	874	(SWAC)
S2_10-13	S2_10-13_DU04	Other	20.05	390	(SWAC)
S2_10-13	S2_10-13_DU05	Other	20.12	332	(SWAC)
S2_10-13	S2_10-13_DU06	Other	20.07	286	(SWAC)
S2_10-13	S2_10-13_DU07	Other	20.05	266	(SWAC)
S2_10-13	S2_10-13_DU08	Other	20.11	649	(SWAC)
S2_10-13	S2_10-13_DU09	Other	20.06	1,244	(SWAC)
S2_10-13	S2_10-13_DU10	Other	20.08	781	(SWAC)
S2_10-13	S2_10-13_DU11	Other	20.09	674	(SWAC)
S2_10-13	S2_10-13_DU12	Other	20.11	435	(SWAC)
S2_10-13	S2_10-13_DU13	Other	20.13		(SWAC)
S2_10-13	S2_10-13_DU14	Other	20.11	452	(SWAC)
S2_10-13	S2_10-13_DU15	Other	20.10		(ICS Result)
	S2_10-13_DU16	Other	20.07		(SWAC)
S2_10-13	S2_10-13_DU17	Other	20.10		(SWAC)
	S2_10-13_DU18	Other	20.14		(SWAC)
	S2_10-13_DU19	Other	20.04		(SWAC)
	 S2_10-13_DU20	Other	20.16		(SWAC)
	S2_10-13_DU21	Other	20.24		(SWAC)
SEGMENT 3					
S3_095	S3_095_DU01	Other	12.08	807	(SWAC)
SEGMENT 4			<u> </u>		
S4_111	S4_111_DU01	Other	0.15	50	(SWAC)
SEGMENT 5					
S5 002-003	S5 002-003 DU01	Other	19.21	557	(SWAC)
	S5 002-003 DU02	Other	19.25		(SWAC)
	S5 002-003 DU03	Other	19.24		(SWAC)
S5 002-003	S5_002-003_DU04	Other	20.38		(SWAC)
SEGMENT 7			<u> </u>	,	
S7_001	S7_001_DU01	Other	8.63	49	(SWAC)
S7_025	S7 025 DU01	Other	18.20		(SWAC)
S7_051a	S7_051a_DU01	Other	17.64		(SWAC)
S7_051a	S7_051a_DU02	Other	18.12		(SWAC)
S7_051a	S7_051a_DU03	Other	18.19		(SWAC)
S7_051a	S7_051a_DU04	Other	18.28		(SWAC)
S7_056	S7_056_DU01	Other	17.23		(SWAC)
S7_056	S7_056_DU02	Other	17.24		(SWAC)

Appendix A
Summary of Public Use Area Floodplain Evaluation

Property ID	DU ID	Maintained or Other?	DU Area (acres)	Curren	t DU Concentration (ppt TEQ) ¹
S7_056	S7_056_DU03	Other	17.31	632	(SWAC)
S7_056	S7_056_DU04	Other	17.30	441	(SWAC)
S7_120-123	S7_120-123_DU01	Other	18.65	97	(SWAC)
S7_120-123	S7_120-123_DU02	Other	19.88	220	(SWAC)
S7_120-123	S7_120-123_DU03	Other	20.35	221	(SWAC)
S7_120-123	S7_120-123_DU04	Other	19.92	222	(SWAC)
S7_120-123	S7_120-123_DU05	Other	20.00	271	(SWAC)
S7_120-123	S7_120-123_DU06	Other	20.05	319	(SWAC)
S7_120-123	S7_120-123_DU07	Other	20.06	383	(SWAC)
S7_120-123	S7_120-123_DU08	Other	19.48	470	(SWAC)
S7_120-123	S7_120-123_DU09	Other	19.96	464	(SWAC)
S7_120-123	S7_120-123_DU10	Other	20.05	288	(SWAC)
S7_120-123	S7_120-123_DU11	Other	20.04	226	(SWAC)
S7_120-123	S7_120-123_DU12	Other	20.01	217	(SWAC)
S7_120-123	S7_120-123_DU13	Other	19.97	201	(SWAC)
S7_120-123	S7_120-123_DU14	Other	20.00	175	(SWAC)
S7_120-123	S7_120-123_DU15	Other	20.01	155	(SWAC)
S7_120-123	S7_120-123_DU16	Other	20.01	166	(SWAC)
S7_120-123	S7_120-123_DU17	Other	20.08	207	(SWAC)
S7_120-123	S7_120-123_DU18	Other	20.02	235	(SWAC)
S7_120-123	S7_120-123_DU19	Other	20.03	322	(SWAC)
S7_120-123	S7_120-123_DU20	Other	20.04	377	(SWAC)
S7_120-123	S7_120-123_DU21	Other	20.07	392	(SWAC)
S7_120-123	S7_120-123_DU22	Other	20.15	355	(SWAC)
S7_120-123	S7_120-123_DU23	Other	19.96	279	(SWAC)
S7_120-123	S7_120-123_DU24	Other	20.14	291	(SWAC)
S7_120-123	S7_120-123_DU25	Other	20.32	205	(SWAC)

Notes:

1. Current DU concentration is given as the estimated SWAC where sampling has not yet been conducted in a DU, as the ICS result where sampling has been completed, but remedy has not been conducted.

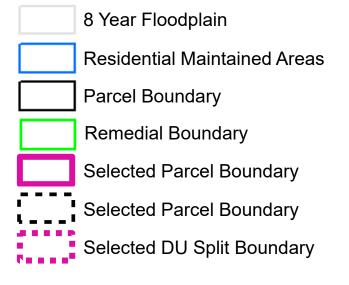
DU: Decision unit

ICS: Incremental composite sampling

ppt TEQ: parts per trillion toxic equivalence

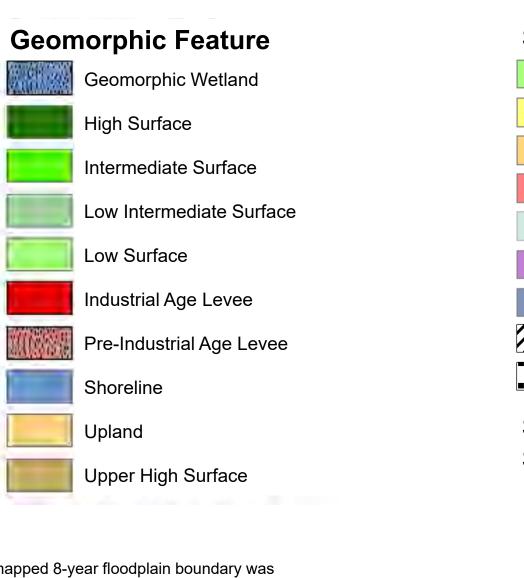
SWAC: Surface-weighted average concentration

General Information





All parcel maps are oriented with north at the top of the page



- Notes:
- 1. Proxy values were assigned in 2015 to geomorphic polygons where the mapped 8-year floodplain boundary was identified outside the FEMA 100-year floodplain boundary (used as the outer boundary during the 2006-2008 site characterization work). A similar process was used to assign proxy concentrations as used by ATS.
- 2. SAC concentrations are indicated with black labels and sample concentrations are indicated with white labels in parcel maps as space permits.



Segment 2 Properties - Legend Tittabawassee River Floodplain Post-Removal Site Control Plan

SAC Surface TEQ (ppt)

- ≤ 100
- 101-1000
- 1001-2000
- 2001-3000
- 3001-4000
- 4001-5000
- > 5000
- Proxy Areas 2015 Extensions (see Note 1)
- Proxy Areas 2006-2008 (by ATS)

Sample Locations Surface TEQ (ppt)

≤ 90

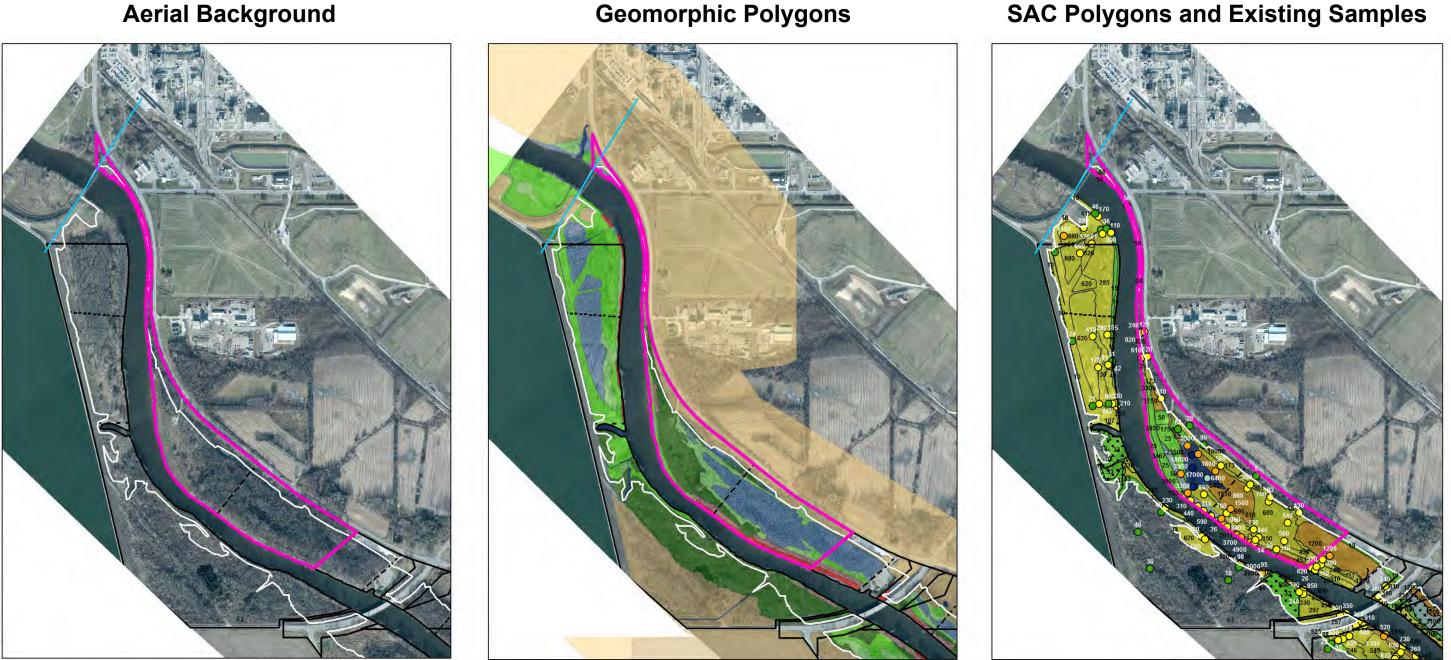
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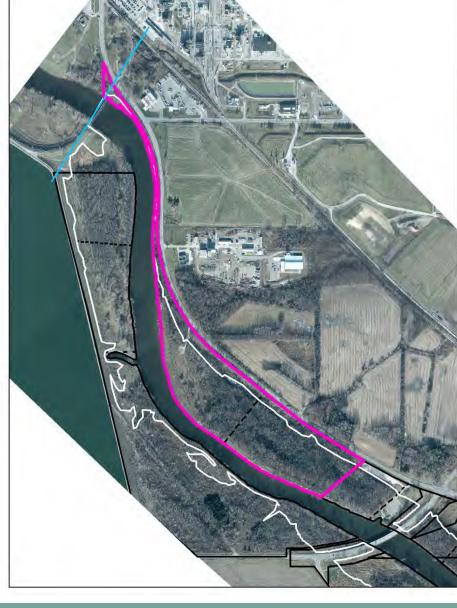
- 91-1000
- 1001-5000
- 5001-10000
- > 10000

Figure LEGEND

Area of Maintained Land in 8-Year Floodplain: 0.0 acres Area of Other Land in 8-Year Floodplain: 40.5 acres







Decision Unit ID – S2_01_DU01 through S2_01_DU03 Tittabawassee River Floodplain Post-Removal Site Control Plan

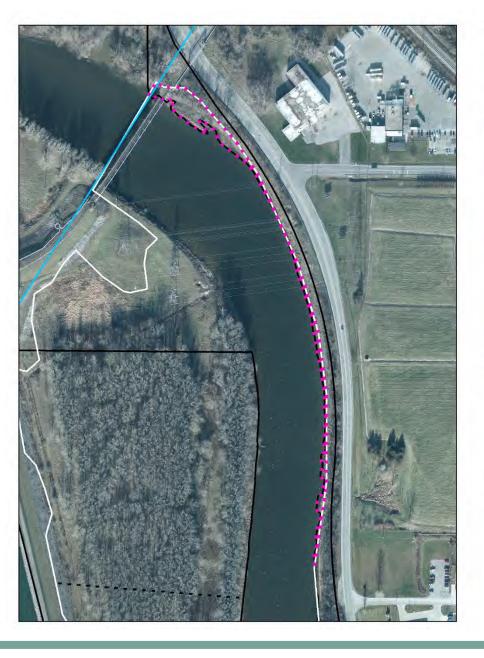
Rev 0 — July 27th, 2021

LAND USE VERIFIED

SAC Polygons and Existing Samples

Figure S2_01

Aerial Background



Geomorphic Polygons





Decision Unit ID – S2_01_DU01 Tittabawassee River Floodplain Post-Removal Site Control Plan

Rev 0 — July 27th, 2021

LAND USE VERIFIED

SAC Polygons and Existing Samples



Figure S2_01_1 Area in 8-year Floodplain: 9.5 acres

Area of Maintained Land in 8-Year Floodplain: 0.0 acres Area of Other Land in 8-Year Floodplain: 9.5 acres



Aerial Background

Geomorphic Polygons







Decision Unit ID – S2_02_DU01 and S2_02_DU02 Tittabawassee River Floodplain Post-Removal Site Control Plan

Rev 0 — July 27th, 2021

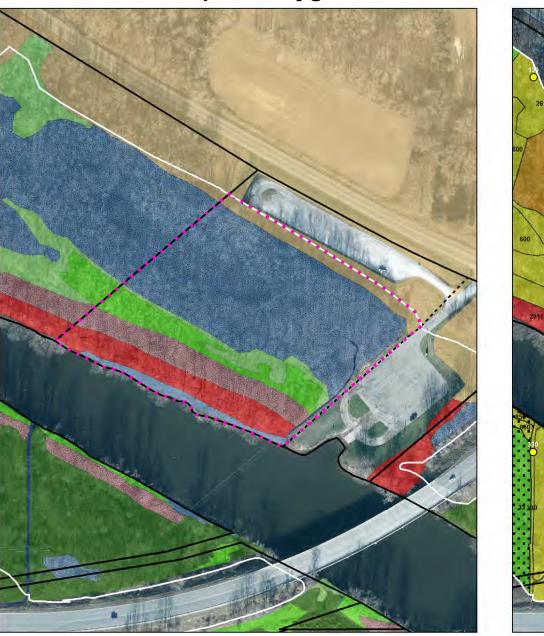
LAND USE VERIFIED

SAC Polygons and Existing Samples

Figure S2_02 Area of DU: 7.3 acres



Geomorphic Polygons





Decision Unit ID – S2_02_DU01 Tittabawassee River Floodplain Post-Removal Site Control Plan

Rev 0 — July 27th, 2021

LAND USE VERIFIED

SAC Polygons and Existing Samples

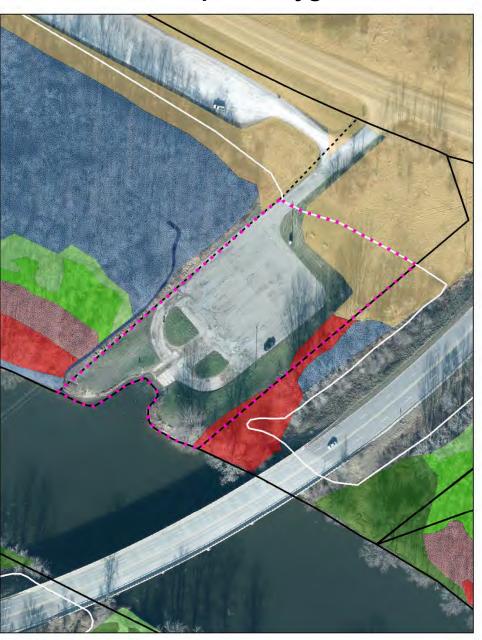


Figure S2_02_1



Aerial Background

Geomorphic Polygons



SAC Polygons and Existing Samples



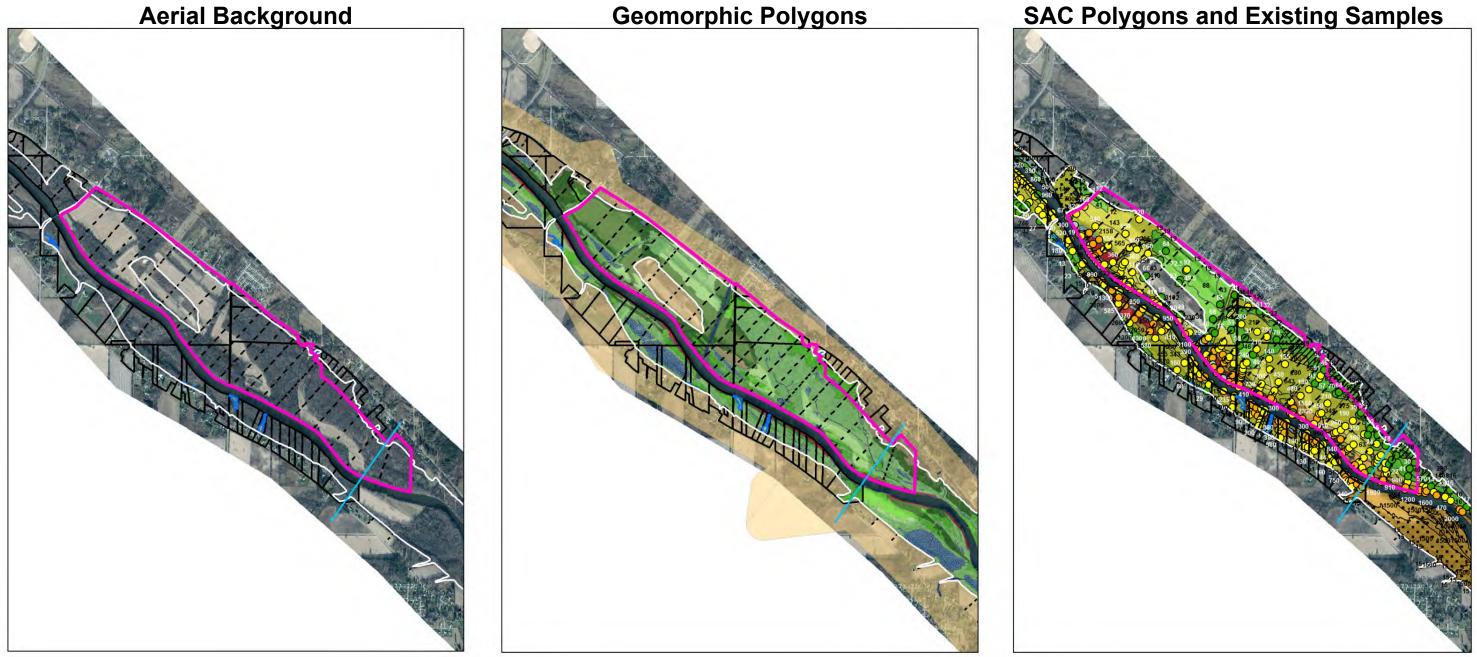


Decision Unit ID – S2_02_DU02 Tittabawassee River Floodplain Post-Removal Site Control Plan

Rev 0 — July 27th, 2021

LAND USE VERIFIED

Figure S2_02_2 Area of Maintained Land in 8-Year Floodplain: 0.0 acres Area of Other Land in 8-Year Floodplain: 421.5 acres



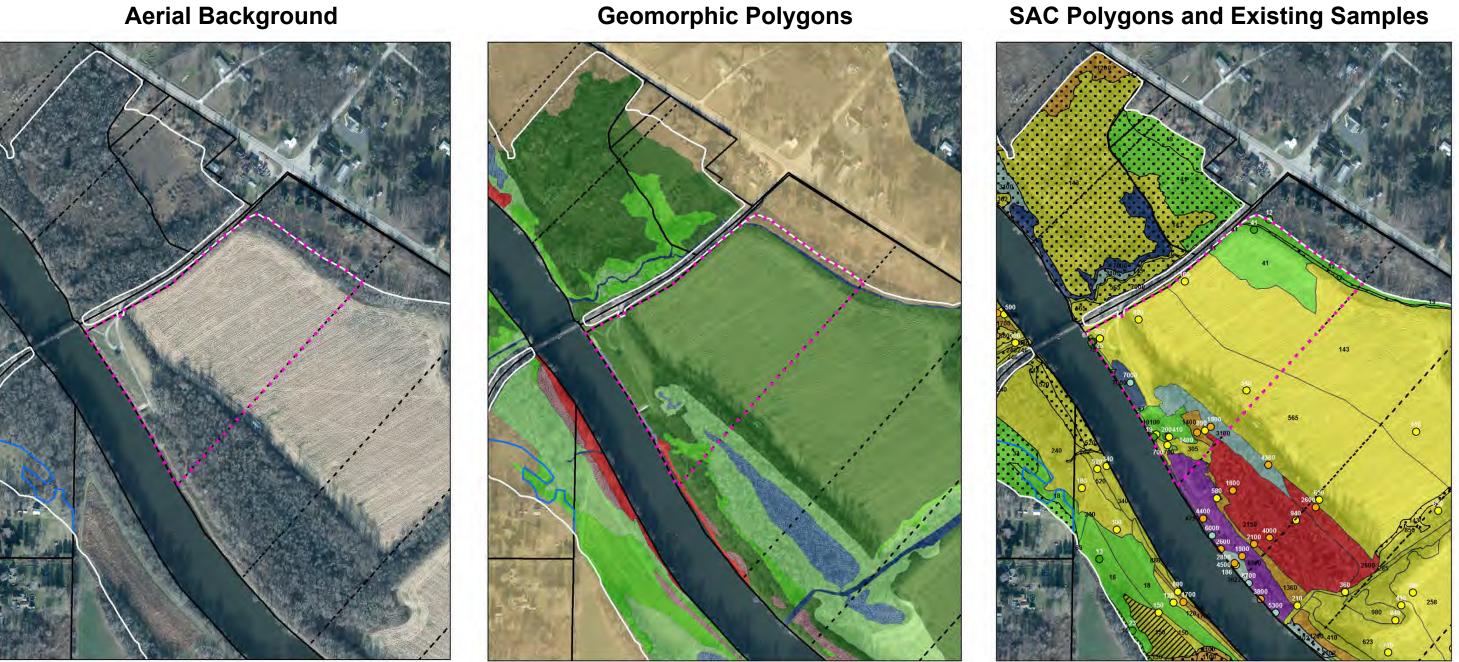


Decision Unit ID – S2_10-13_DU01 through S2_10-13_DU21 Tittabawassee River Floodplain Post-Removal Site Control Plan

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LAND USE VERIFIED

Figure S2_10-13







S2_10-13_DU01 Tittabawassee River Floodplain Post-Removal Site Control Plan

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LAND USE VERIFIED

SAC Polygons and Existing Samples



Geomorphic Polygons



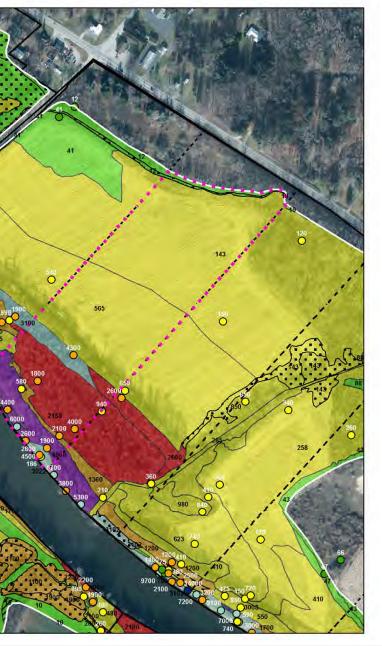


Tittabawassee River Floodplain Post-Removal Site Control Plan

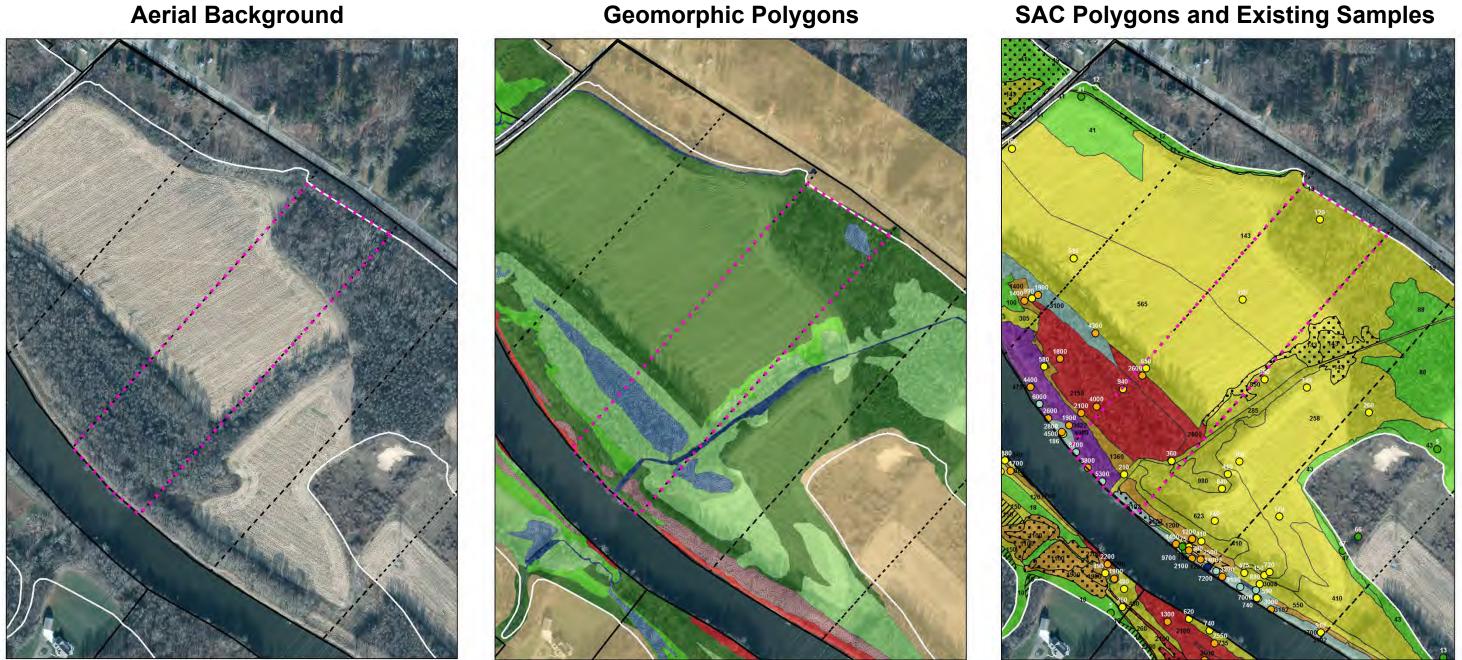
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LAND USE VERIFIED

SAC Polygons and Existing Samples



S2_10-13_DU02







S2_10-13_DU03 Tittabawassee River Floodplain Post-Removal Site Control Plan

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LAND USE VERIFIED

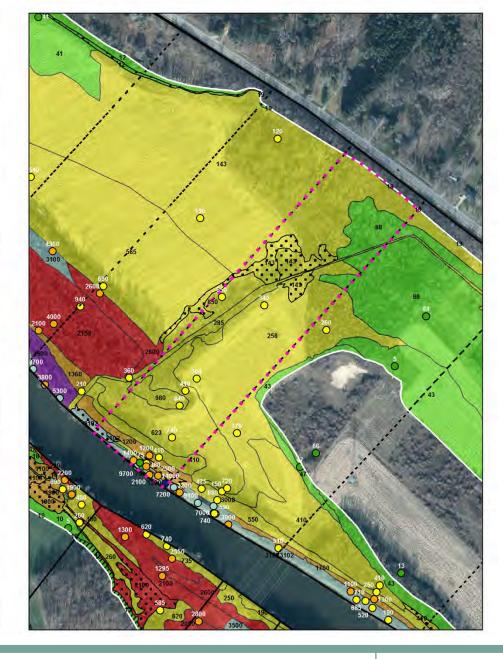
SAC Polygons and Existing Samples



Geomorphic Polygons



SAC Polygons and Existing Samples

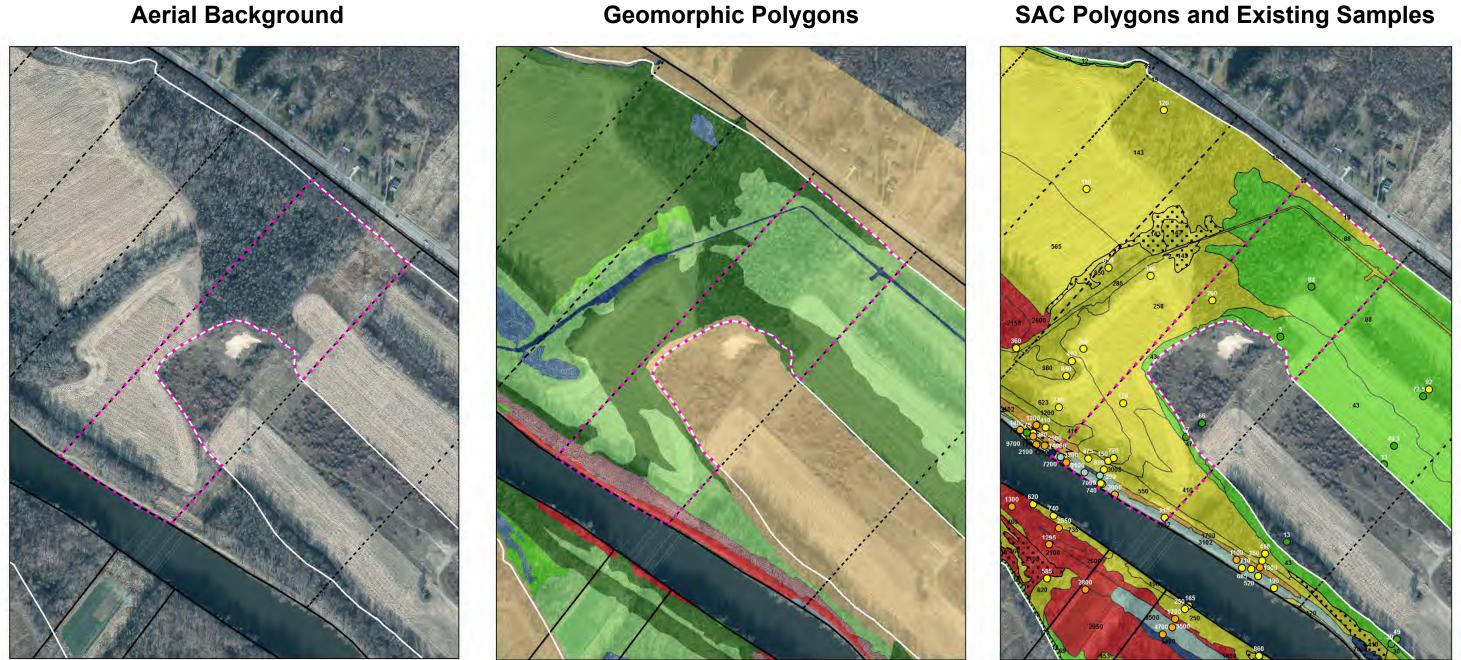




S2_10-13_DU04 Tittabawassee River Floodplain Post-Removal Site Control Plan

Rev 0 — July 27th, 2021

LAND USE VERIFIED



Geomorphic Polygons

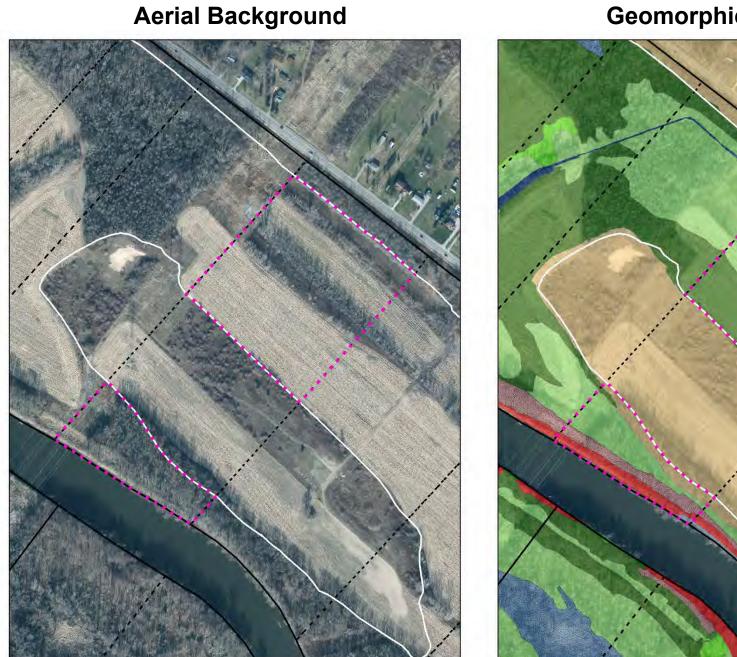


S2_10-13_DU05 Tittabawassee River Floodplain Post-Removal Site Control Plan

Rev 0 — July 27th, 2021

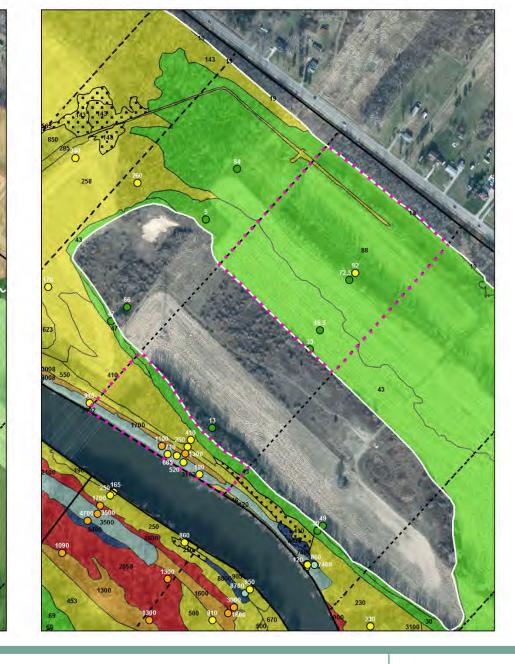
LAND USE VERIFIED

SAC Polygons and Existing Samples



Geomorphic Polygons

SAC Polygons and Existing Samples



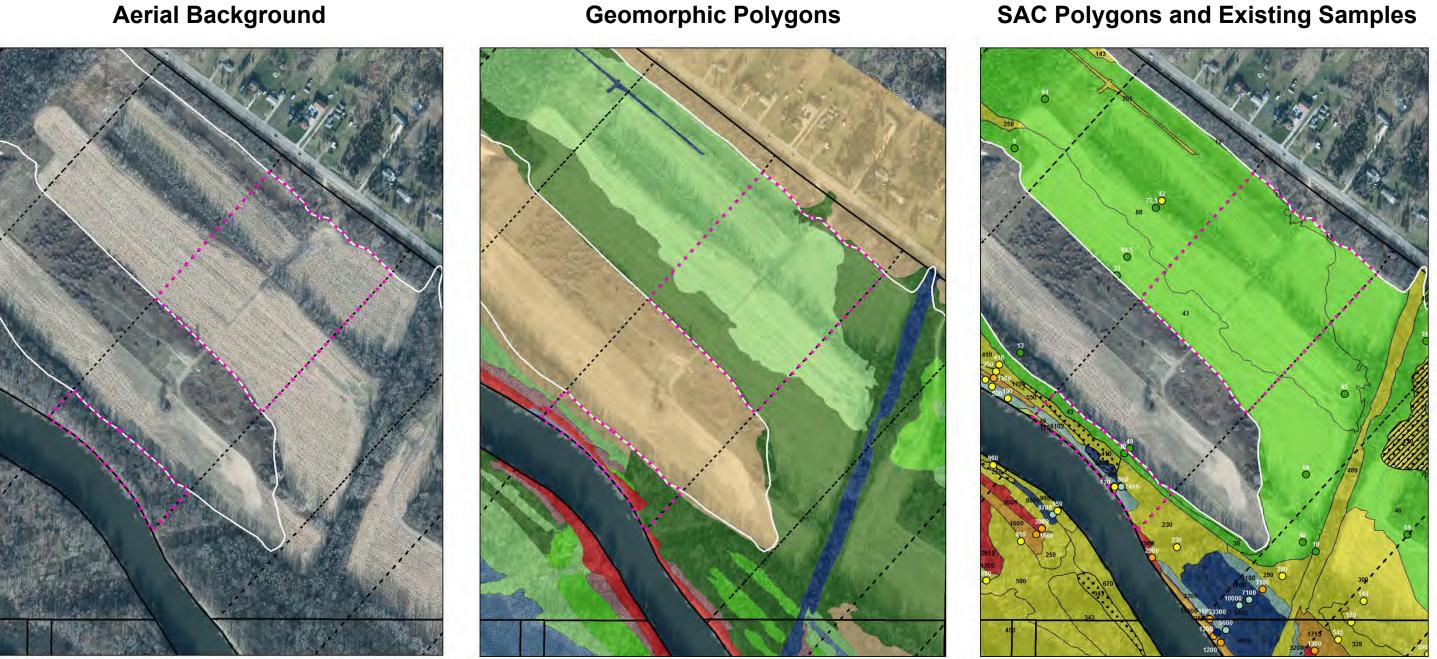


Tittabawassee River Floodplain Post-Removal Site Control Plan

Rev 0 — July 27th, 2021

LAND USE VERIFIED

S2_10-13_DU06



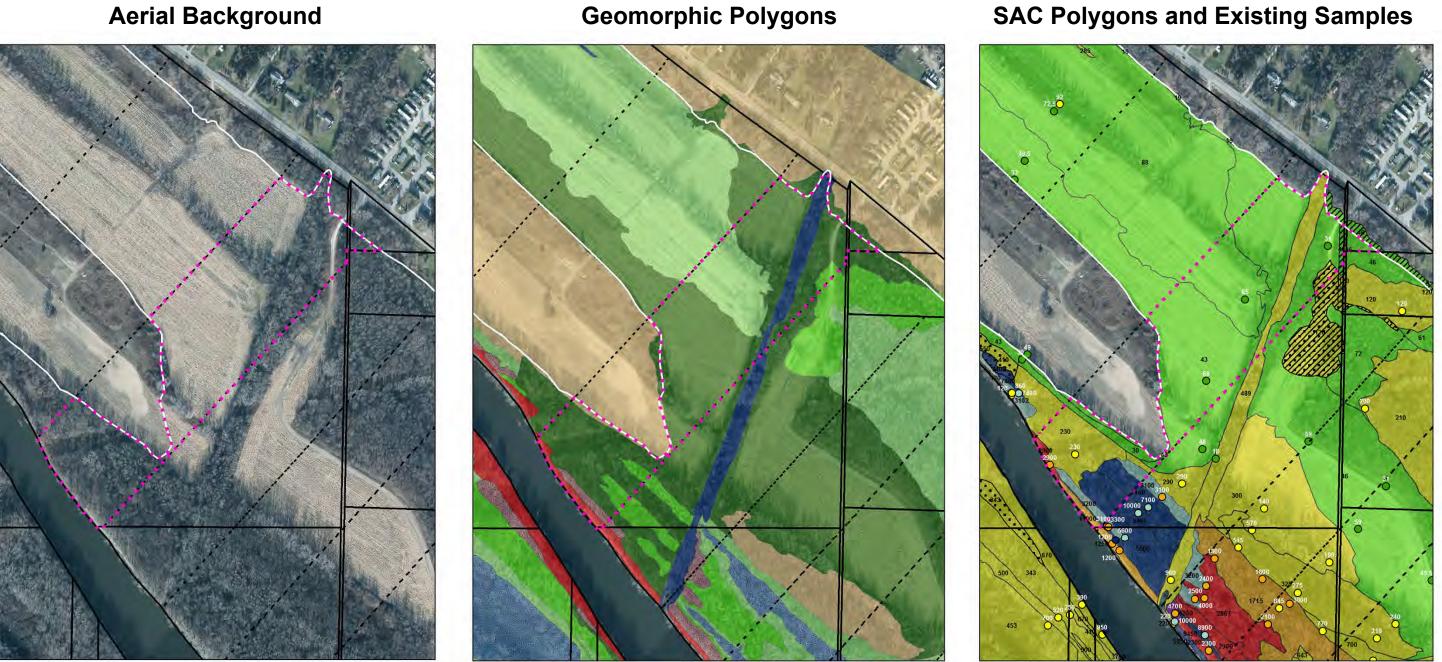


S2_10-13_DU07 Tittabawassee River Floodplain Post-Removal Site Control Plan

Rev 0 — July 27th, 2021

LAND USE VERIFIED

SAC Polygons and Existing Samples

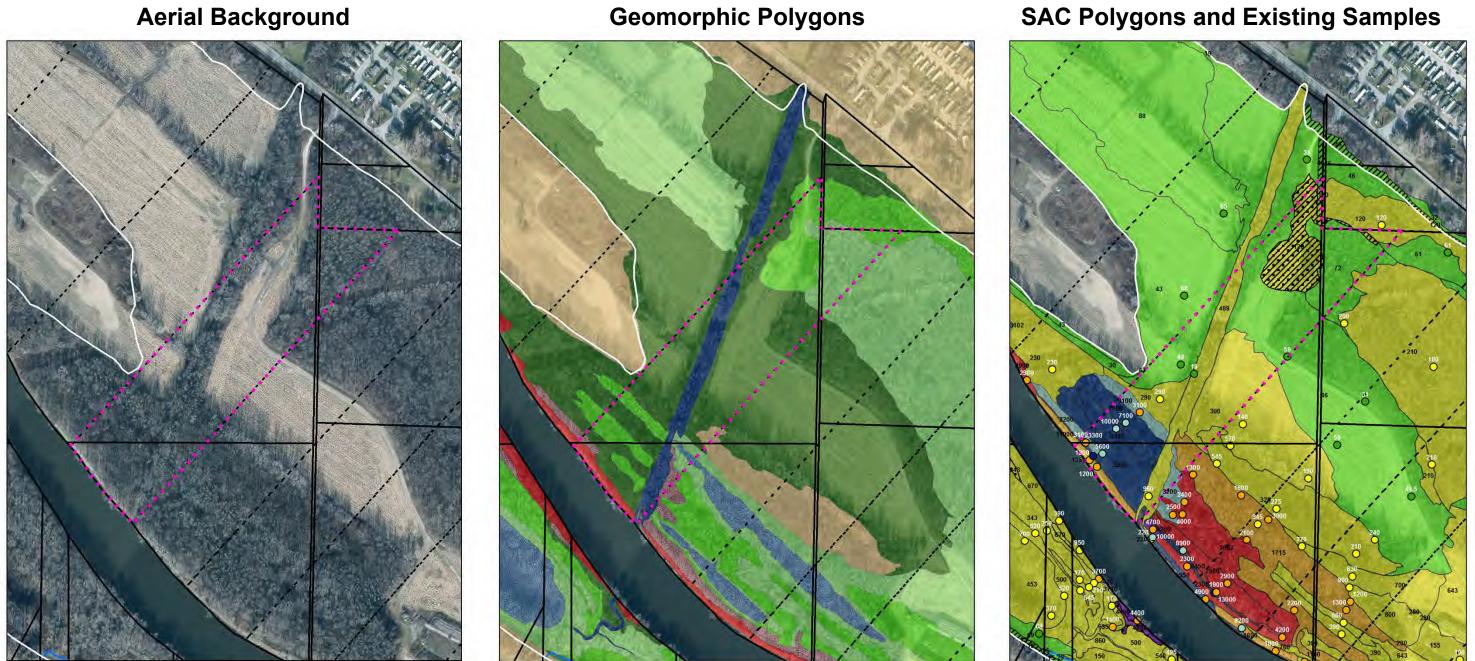




S2_10-13_DU08 Tittabawassee River Floodplain Post-Removal Site Control Plan

Rev 0 — July 27th, 2021

LAND USE VERIFIED



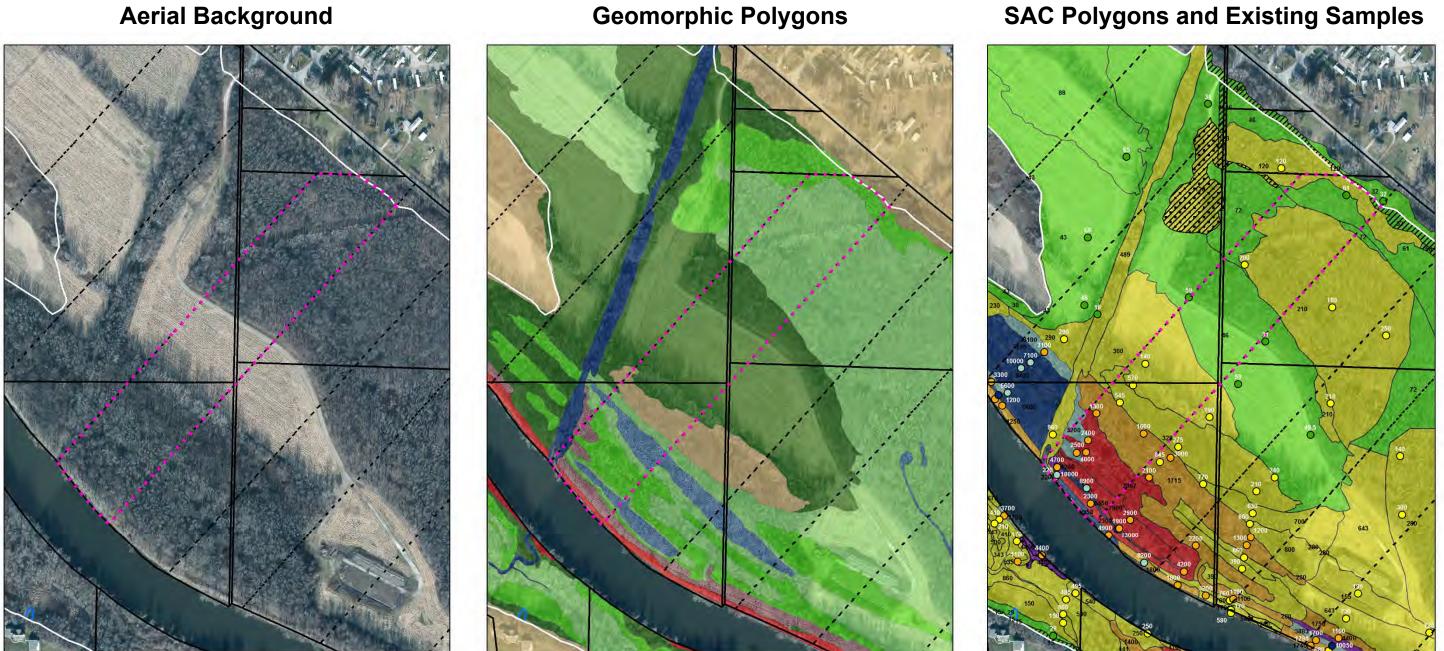


Tittabawassee River Floodplain Post-Removal Site Control Plan

Rev 0 — July 27th, 2021

LAND USE VERIFIED

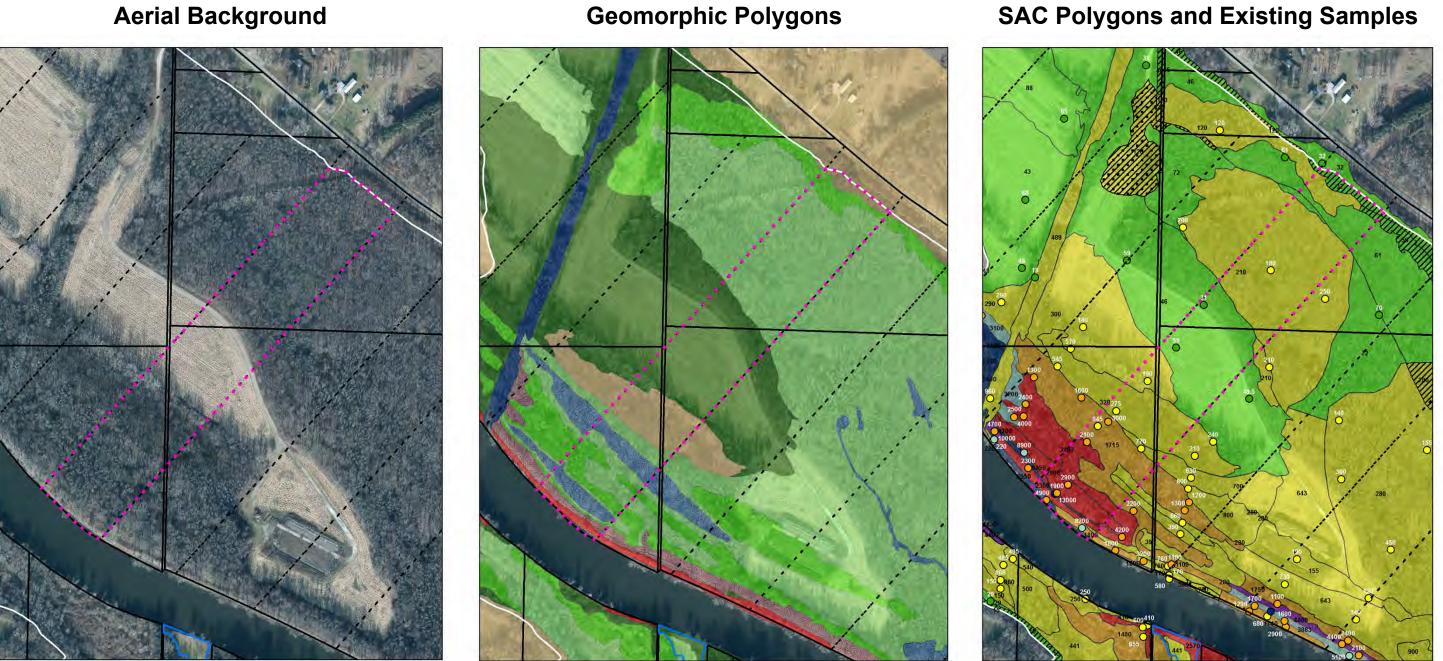
S2_10-13_DU09



S2_10-13_DU10 Tittabawassee River Floodplain Post-Removal Site Control Plan

Rev 0 — July 27th, 2021

LAND USE VERIFIED





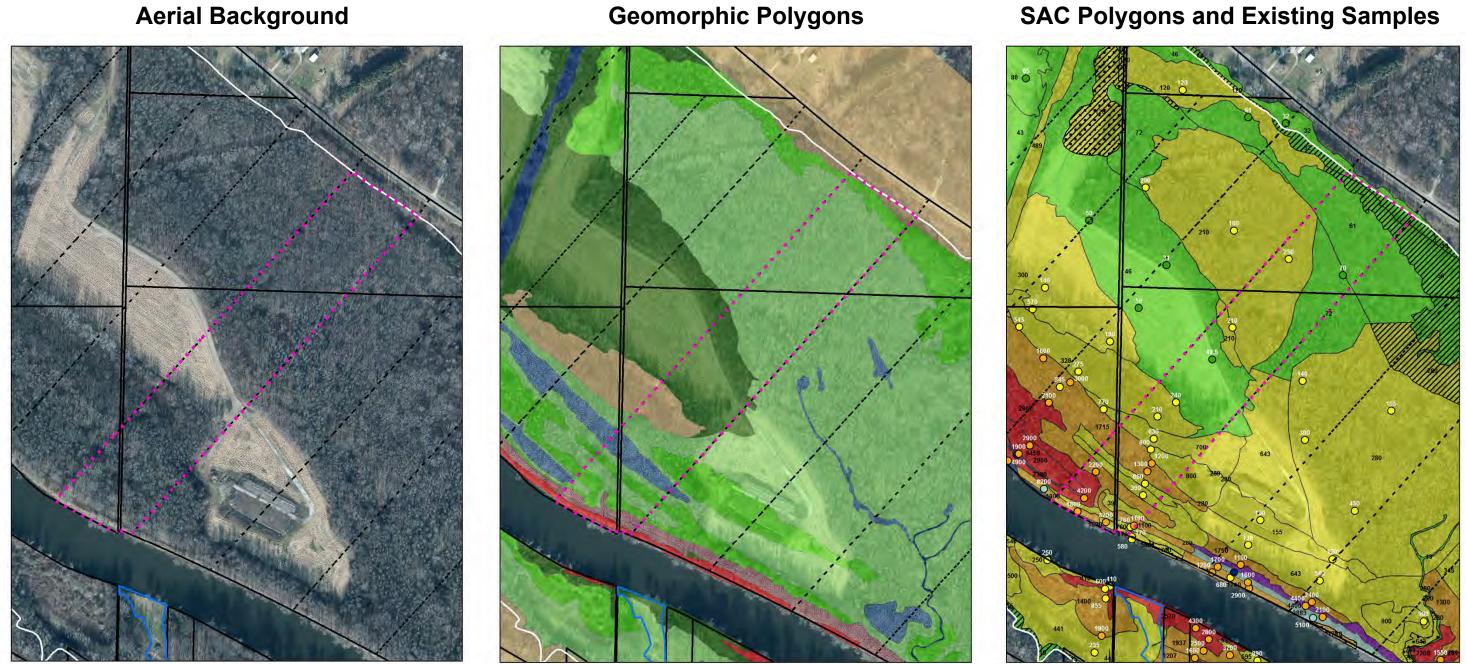


Rev 0 — July 27th, 2021

LAND USE VERIFIED

SAC Polygons and Existing Samples

S2_10-13_DU11

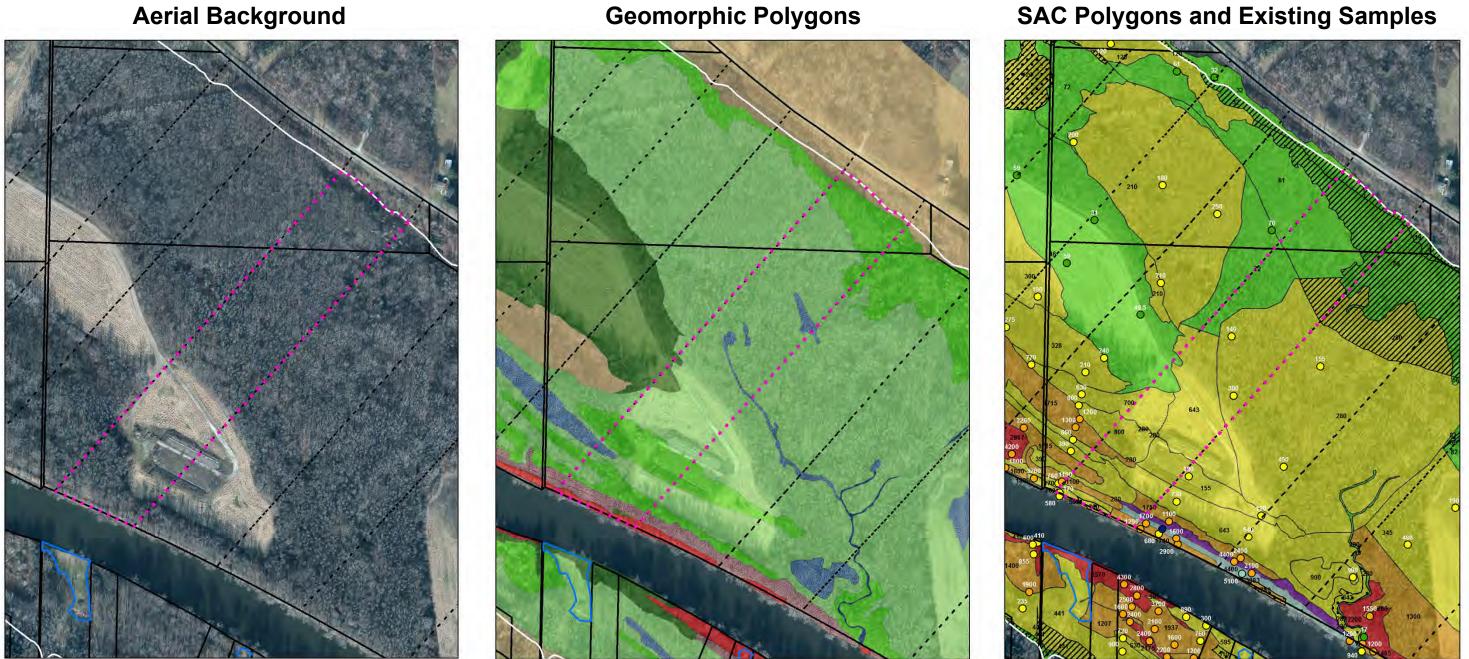




S2_10-13_DU12 Tittabawassee River Floodplain Post-Removal Site Control Plan

Rev 0 — July 27th, 2021

LAND USE VERIFIED

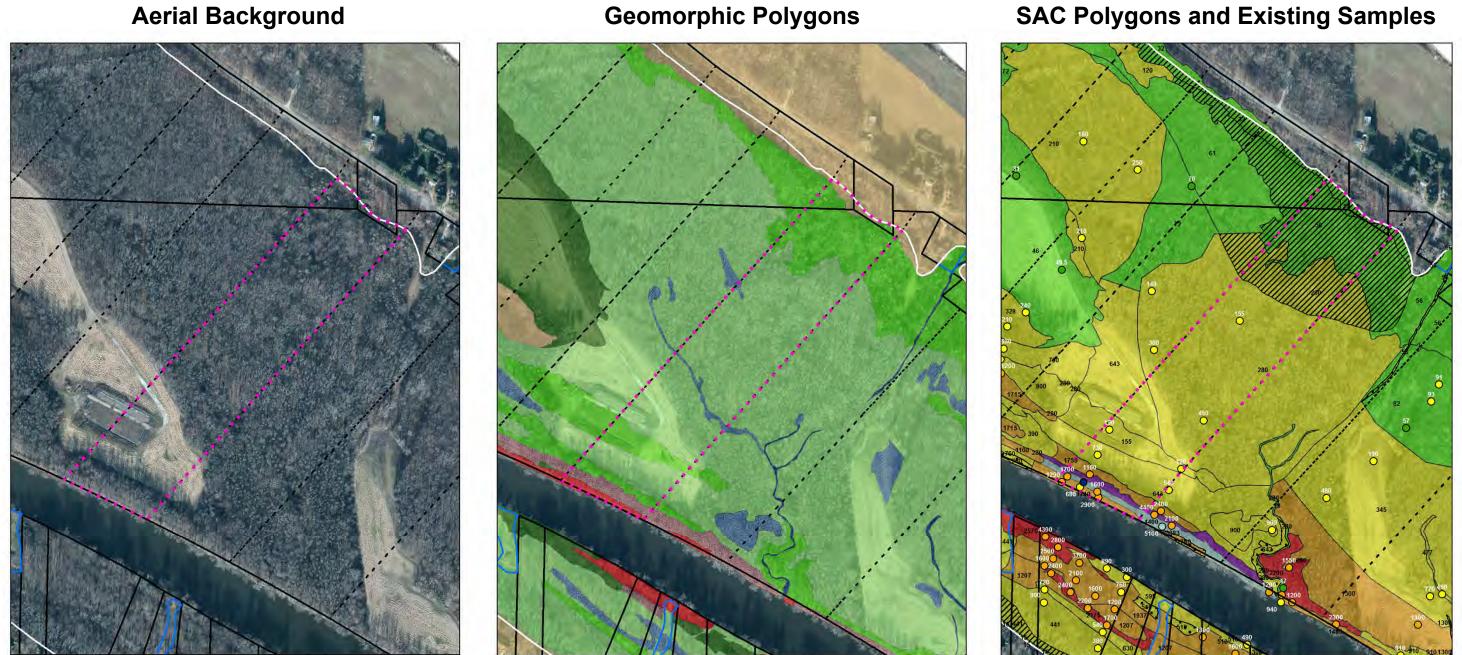




S2_10-13_DU13 Tittabawassee River Floodplain Post-Removal Site Control Plan

Rev 0 — July 27th, 2021

LAND USE VERIFIED

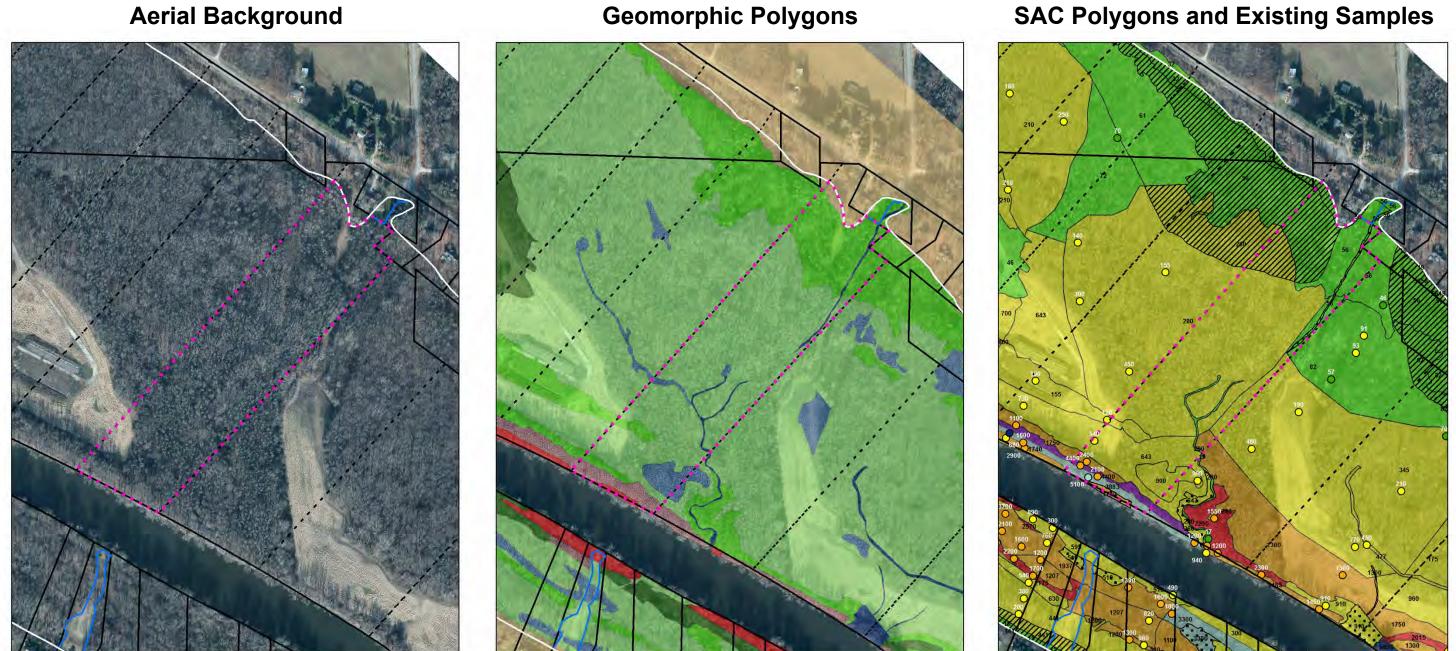




S2_10-13_DU14 Tittabawassee River Floodplain Post-Removal Site Control Plan

Rev 0 — July 27th, 2021

LAND USE VERIFIED



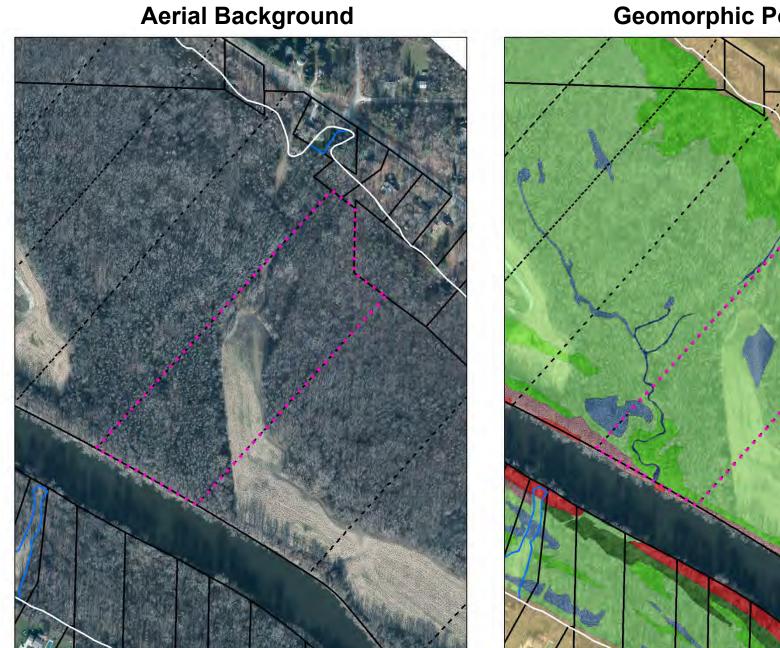


S2_10-13_DU15 Tittabawassee River Floodplain Post-Removal Site Control Plan

Rev 0 — July 27th, 2021

LAND USE VERIFIED

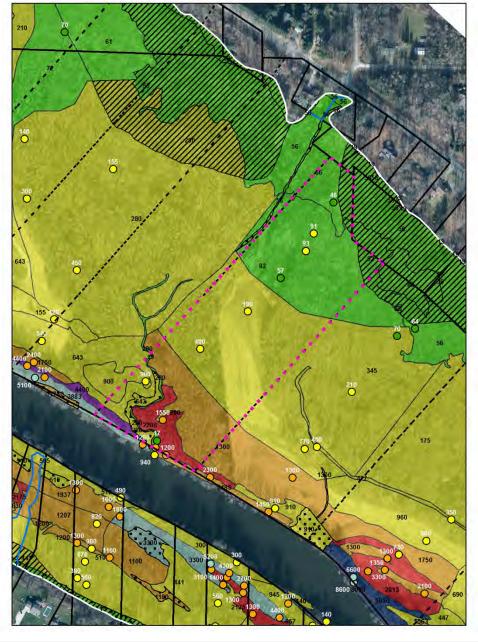
SAC Polygons and Existing Samples



Geomorphic Polygons









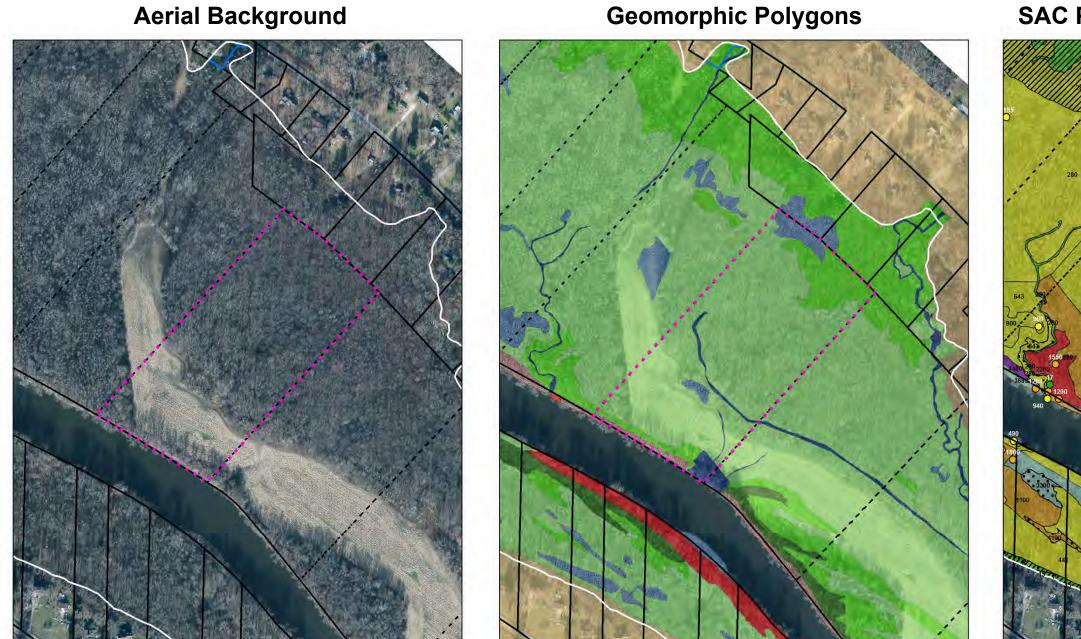
Tittabawassee River Floodplain Post-Removal Site Control Plan

Rev 0 — July 27th, 2021

LAND USE VERIFIED

SAC Polygons and Existing Samples

S2_10-13_DU16





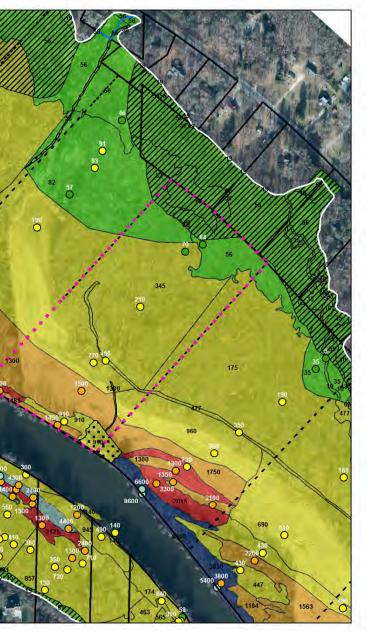


Tittabawassee River Floodplain Post-Removal Site Control Plan

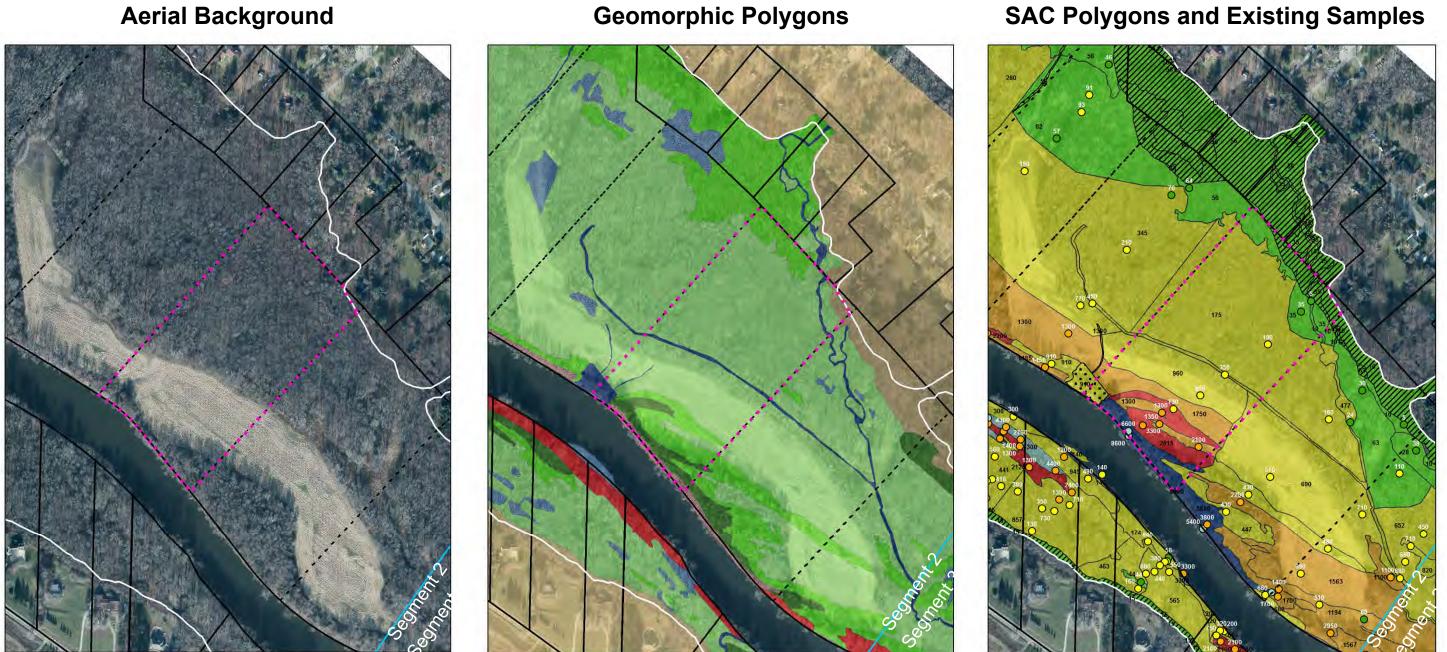
Rev 0 — July 27th, 2021

LAND USE VERIFIED

SAC Polygons and Existing Samples



S2_10-13_DU17



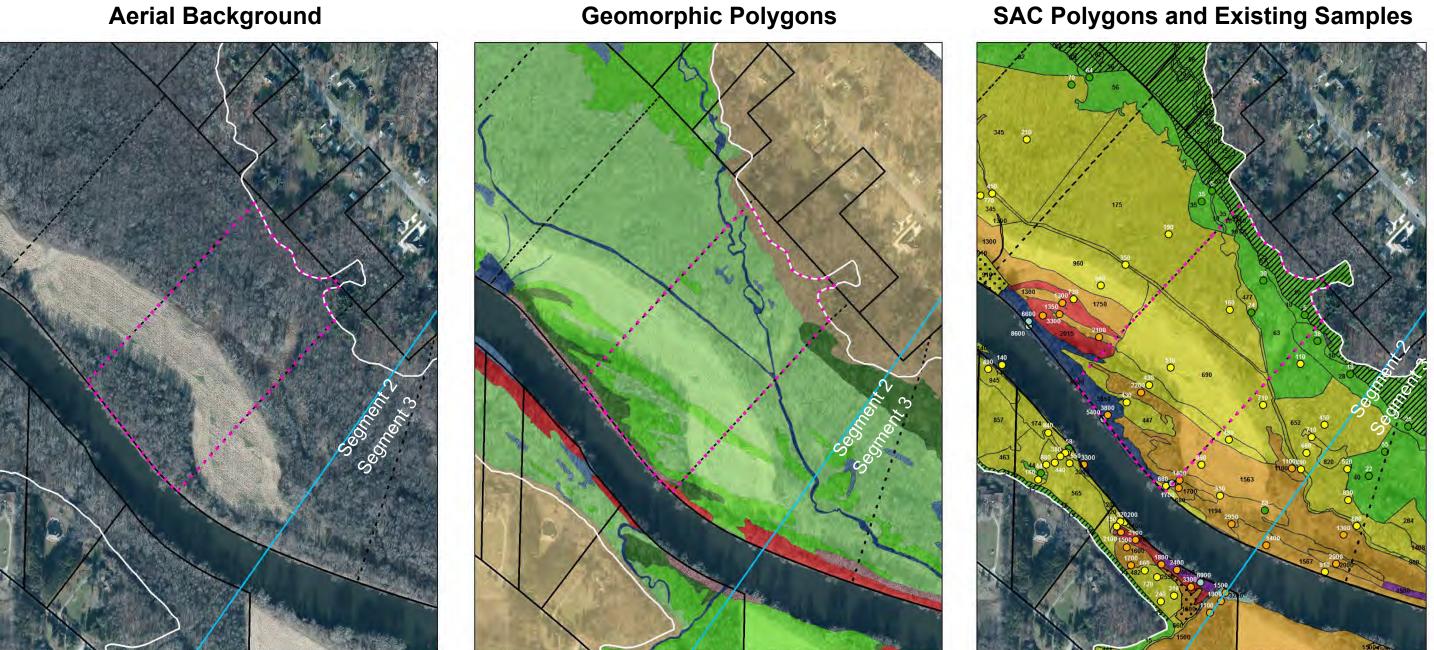


S2_10-13_DU18 Tittabawassee River Floodplain Post-Removal Site Control Plan

Rev 0 — July 27th, 2021

LAND USE VERIFIED

SAC Polygons and Existing Samples

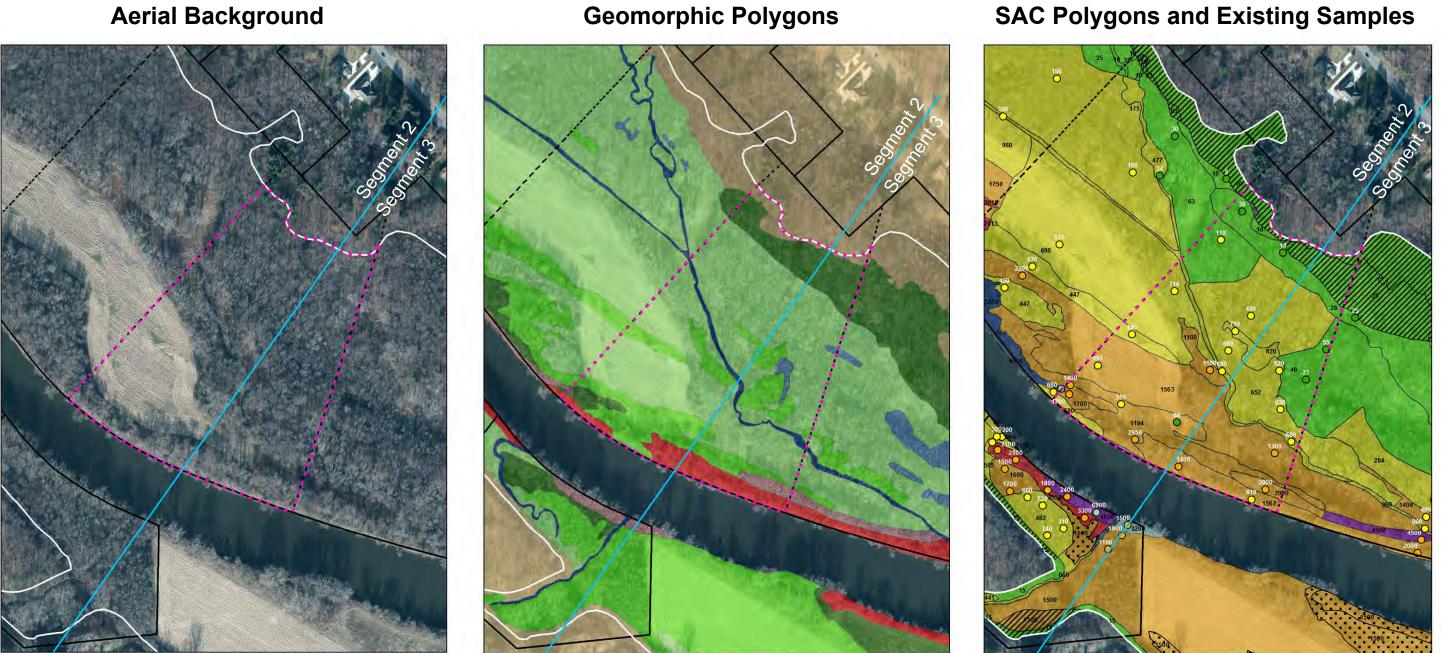




S2_10-13_DU19 Tittabawassee River Floodplain Post-Removal Site Control Plan

Rev 0 — July 27th, 2021

LAND USE VERIFIED

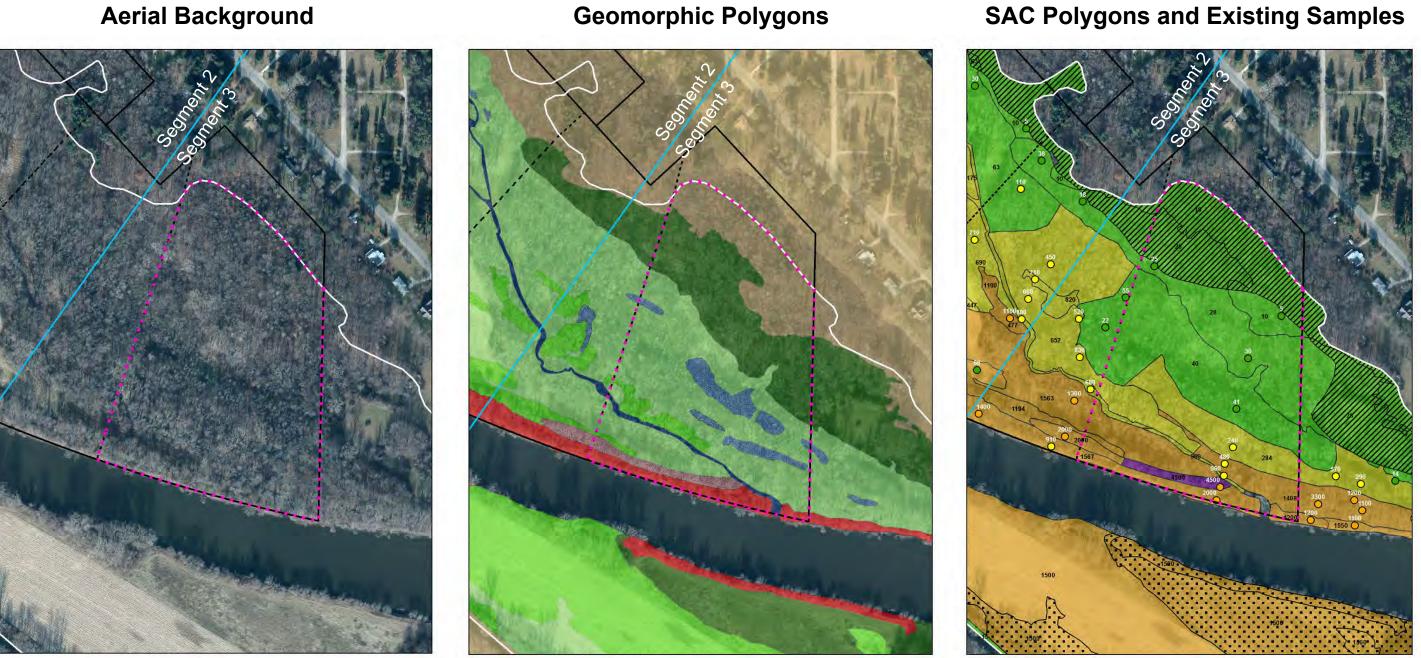




S2_10-13_DU20 Tittabawassee River Floodplain Post-Removal Site Control Plan

Rev 0 — July 27th, 2021

LAND USE VERIFIED





S2_10-13_DU21 Tittabawassee River Floodplain Post-Removal Site Control Plan

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LAND USE VERIFIED

Area of Maintained Land in 8-Year Floodplain: 0.0 acres Area of Other Land in 8-Year Floodplain: 2.9 acres

Aerial Background



Geomorphic Polygons







Decision Unit ID – S2_14_DU01 Tittabawassee River Floodplain Post-Removal Site Control Plan

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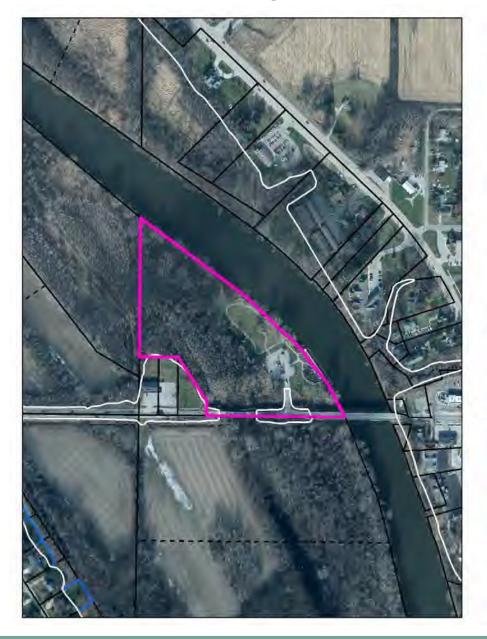
LAND USE VERIFIED

SAC Polygons and Existing Samples

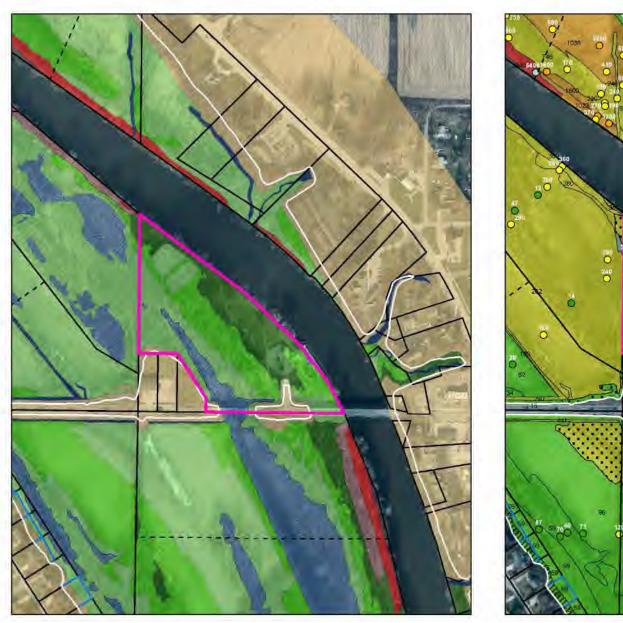
Figure S2_14 Area in 8-year Floodplain: 12.08 acres

Area of Maintained Land in 8-Year Floodplain: 0.00 acres Area of Other Land in 8-Year Floodplain: 12.08 acres

Aerial Background



Geomorphic Polygons





Note - barrier covers were placed in this parcel area. This parcel map therefore includes an updated SWAC estimate that incorporates a revised concentration for this cover area.

Decision Unit ID – S3_095_DU01 Tittabawassee River Floodplain Post-Removal Site Control Plan

Rev 0 — July 27th, 2021

LAND USE VERIFIED

SAC Polygons and Existing Samples



Figure S3_095

Area of Maintained Land in 8-Year Floodplain: 0.00 acres Area of Other Land in 8-Year Floodplain: 0.15 acres

Geomorphic Polygons

Aerial Background





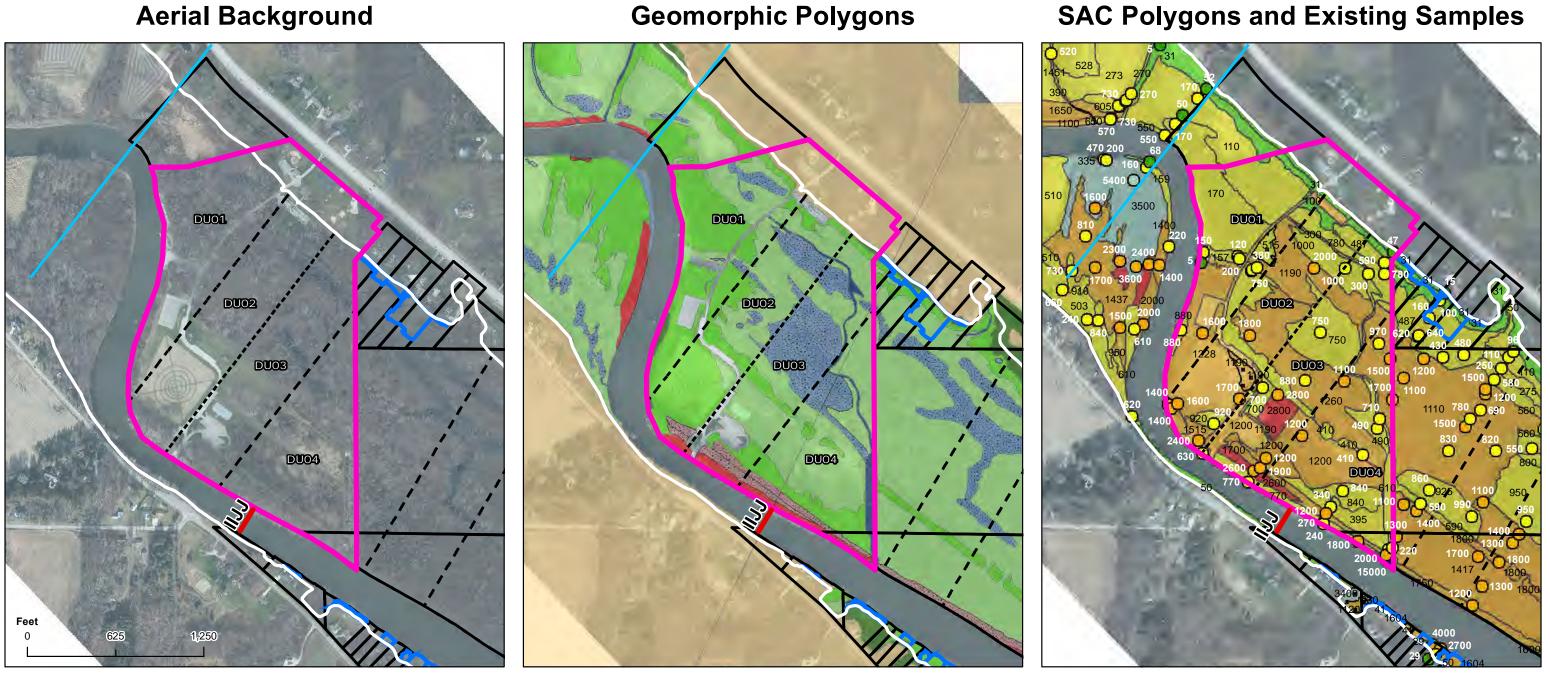
Rev 0 — July 27th, 2021 SCREENED OUT

SAC Polygons and Existing Samples

Decision Unit ID – S4_111_DU01 Tittabawassee River Floodplain Post-Removal Site Control Plan Appendix B

Figure S4_111 Area of Maintained Land in 8-Year Floodplain: 0.00 acres Area of Other Land in 8-Year Floodplain: 78.08 acres

Aerial Background



Decision Unit ID – S5_002-003_DU01 through DU04 Tittabawassee River Floodplain Post-Removal Site Control Plan Appendix B



Rev 0 — July 27th, 2021

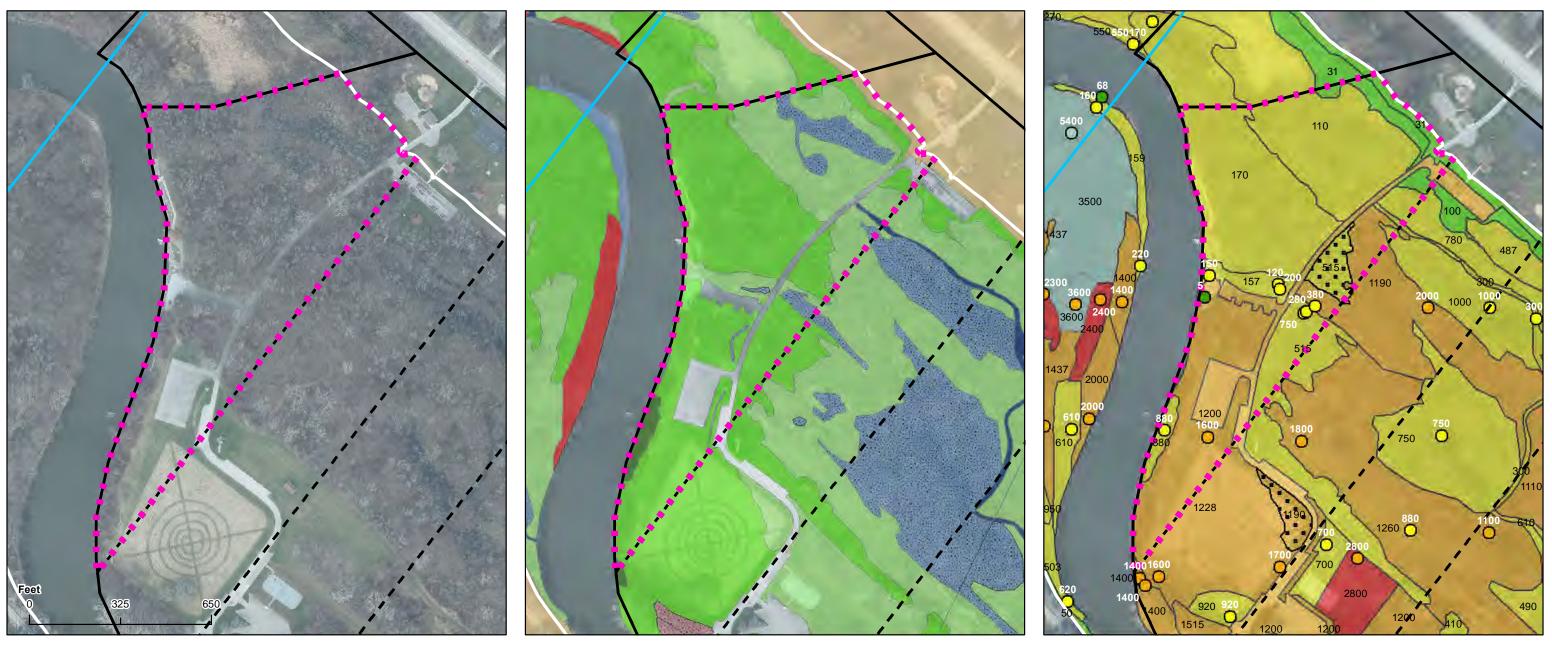
COMBINED PARCELS LAND USE VERIFIED

SAC Polygons and Existing Samples

Figure S5_002-003

Area of DU01: 19.21 acres

Aerial Background



Geomorphic Polygons



Rev 0 — July 27th, 2021

LAND USE VERIFIED **COMBINED PARCELS**

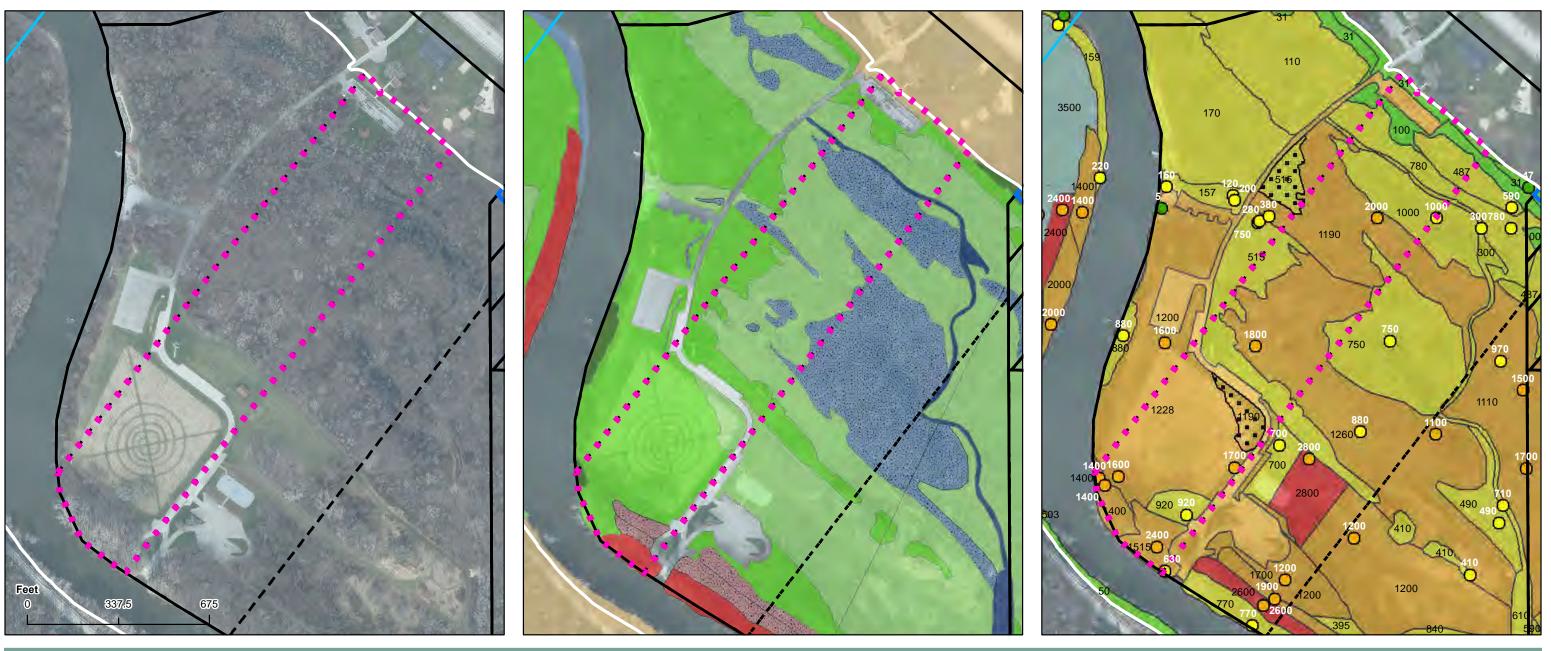
SAC Polygons and Existing Samples

Decision Unit ID – S5_002-003_DU01 Tittabawassee River Floodplain Post-Removal Site Control Plan Appendix B

Figure S5_002-003_1

Area of DU02: 19.25 acres

Aerial Background



Geomorphic Polygons



Rev 0 — July 27th, 2021

LAND USE VERIFIED **COMBINED PARCELS**

SAC Polygons and Existing Samples

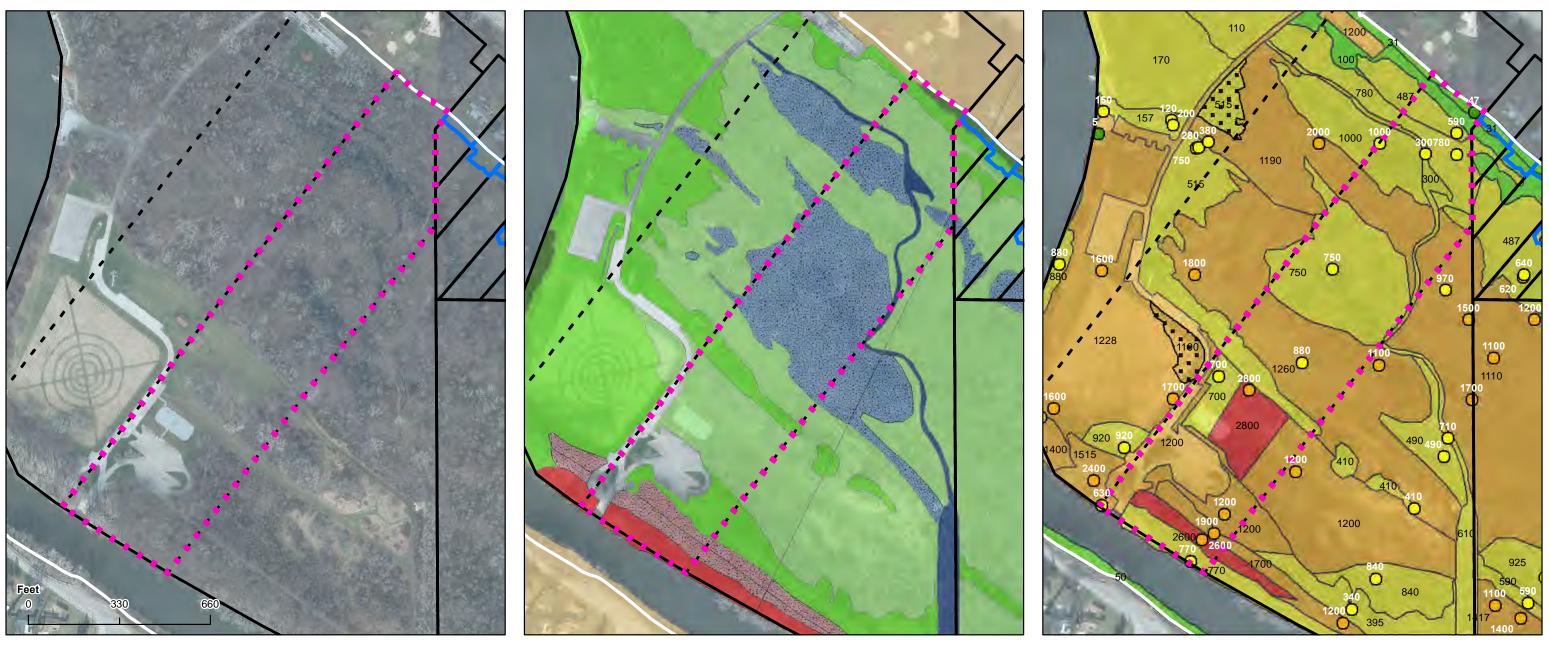


Figure S5_002-

003_2

Area of DU03: 19.24 acres

Aerial Background



Geomorphic Polygons



Rev 0 — July 27th, 2021

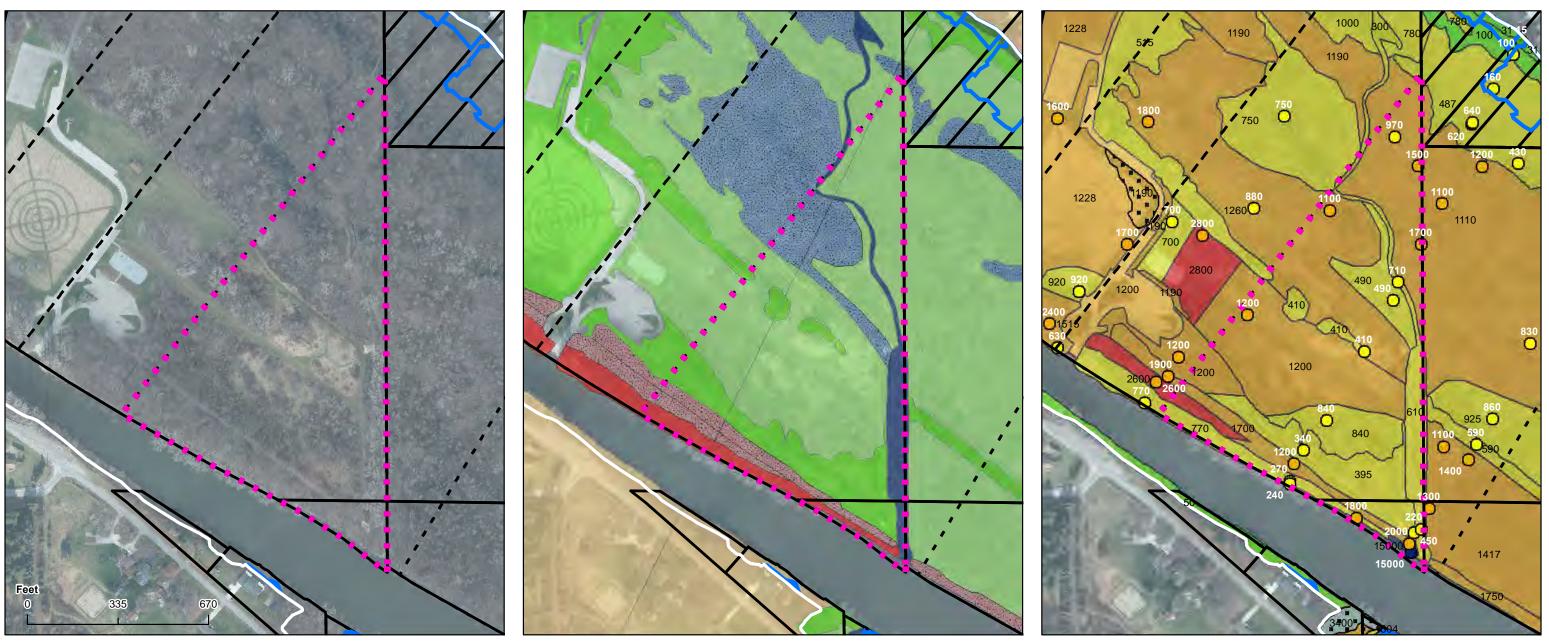
LAND USE VERIFIED **COMBINED PARCELS**

SAC Polygons and Existing Samples



Area of DU04: 20.38 acres

Aerial Background



Geomorphic Polygons





Rev 0 — July 27th, 2021

LAND USE VERIFIED **COMBINED PARCELS**

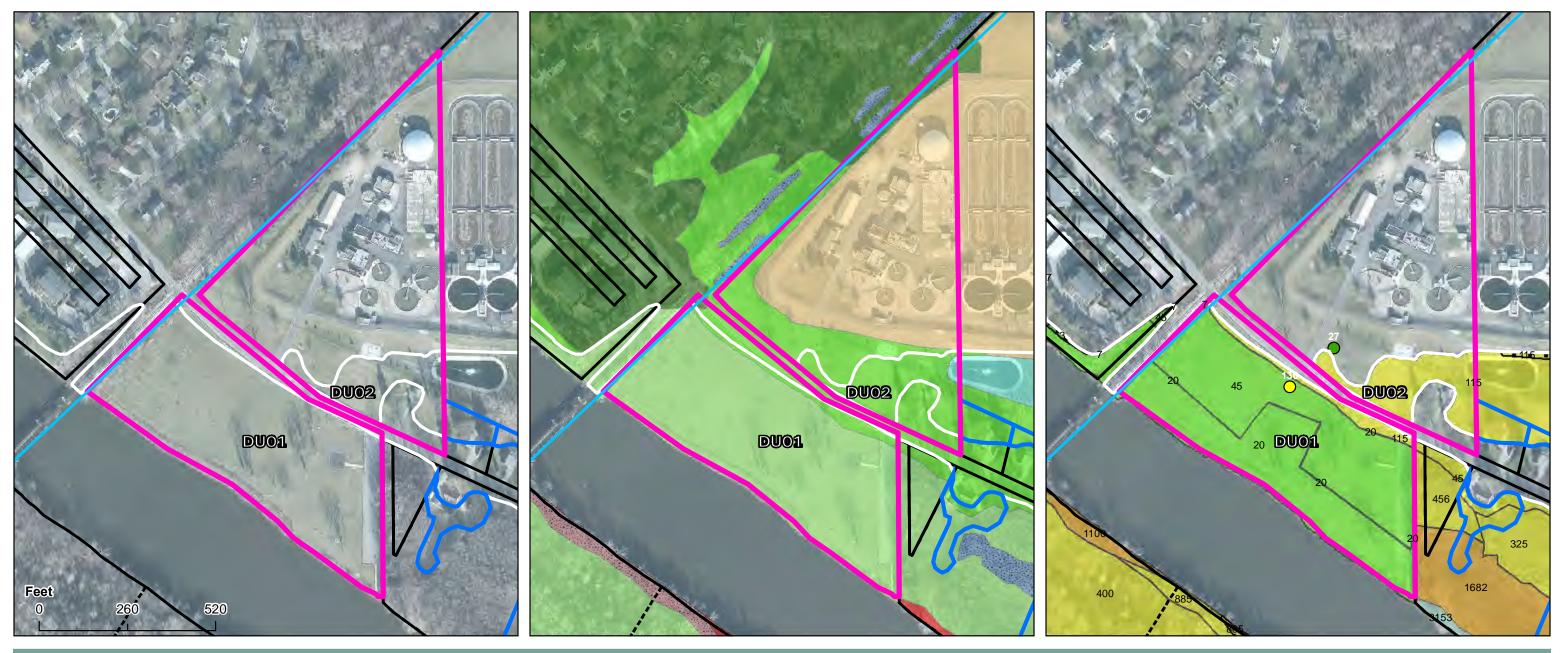
SAC Polygons and Existing Samples

Decision Unit ID – S5_002-003_DU04 Tittabawassee River Floodplain Post-Removal Site Control Plan Appendix B

Figure S5_002-003_4

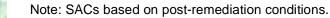
Area of Maintained Land in 8-Year Floodplain: 0.00 acres Area of Other Land in 8-Year Floodplain (DU01 and DU02): 8.63 acres

Aerial Background



Geomorphic Polygons





Rev 0 — July 27th, 2021 SCREENED OUT

SAC Polygons and Existing Samples

Decision Unit ID – S7_001_DU01 and DU02 Tittabawassee River Floodplain Post-Removal Site Control Plan Appendix B

Figure S7_001 Area of DU: 7.35 acres

Aerial Background







Note: SACs based on post-remediation conditions.

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SAC Polygons and Existing Samples

Decision Unit ID – S7_001_DU01 Tittabawassee River Floodplain Post-Removal Site Control Plan Appendix B

Figure S7_001_1 Area of Maintained Land in 8-Year Floodplain: 0.00 acres Area of Other Land in 8-Year Floodplain: 18.20 acres

Aerial Background Geomorphic Polygons SAC Polygons and Existing Samples 464 C 5700 O 300 Feet 455 910



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Decision Unit ID – S7_025_DU01 Tittabawassee River Floodplain Post-Removal Site Control Plan Appendix B

Figure S7_025 **Geomorphic Polygons**

Aerial Background

DU04 DU04 DU01 DU01 UOS **DU02** DU02 DUOS DUOS Feet 1,000 0 500

Decision Unit ID – S7_051_DU01 through DU04 Tittabawassee River Floodplain Post-Removal Site Control Plan Appendix B



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SAC Polygons and Existing Samples

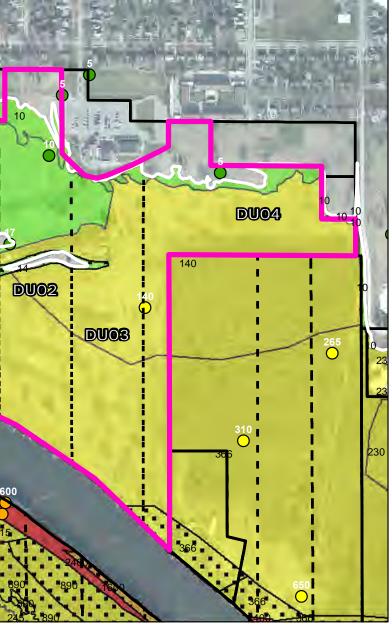
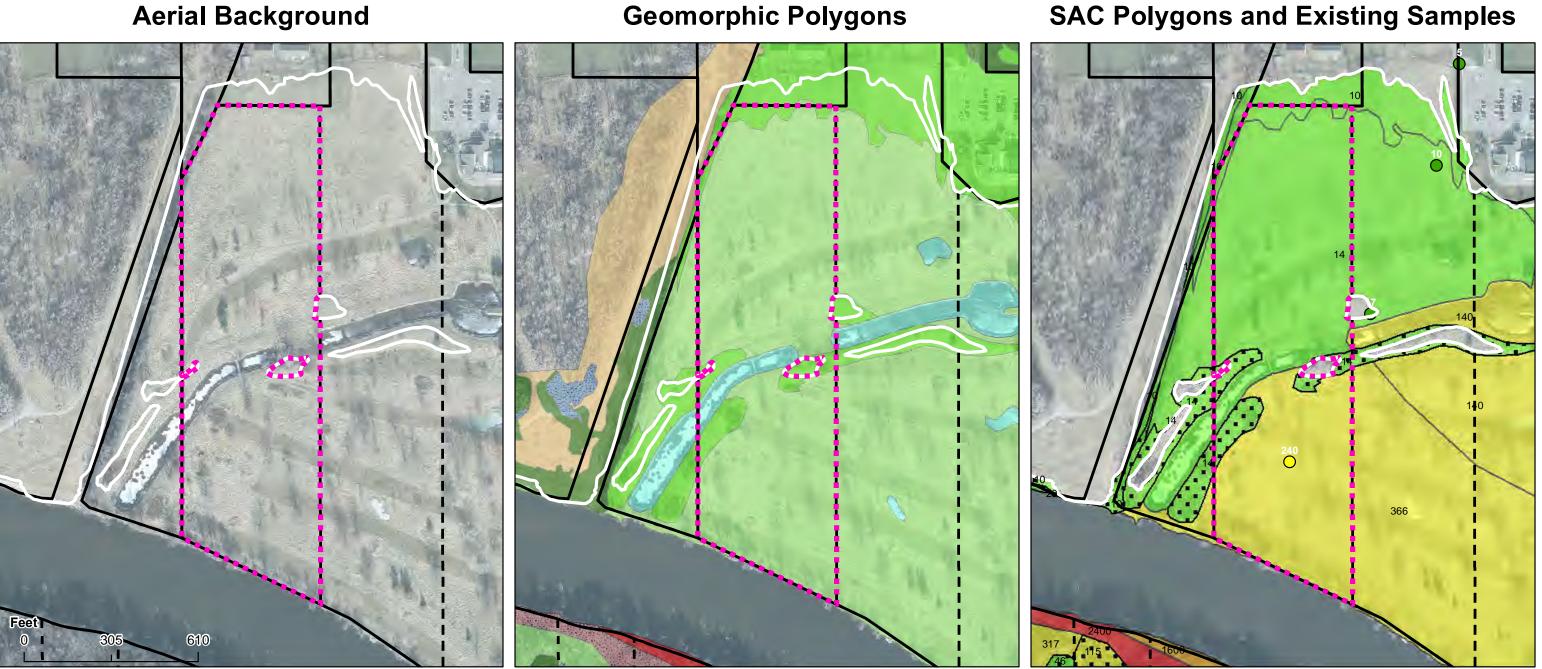


Figure S7_051a Area of DU: 17.64 acres

Aerial Background







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SAC Polygons and Existing Samples

Decision Unit ID – S7_051a_DU01 Tittabawassee River Floodplain Post-Removal Site Control Plan Appendix B

Figure S7_051a _1

Area of DU: 18.12 acres

Geomorphic Polygons

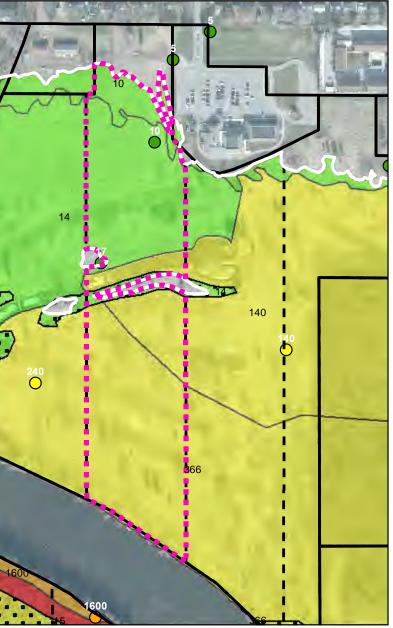
Aerial Background

Feet



Rev 0 — July 27th, 2021 LAND USE VERIFIED

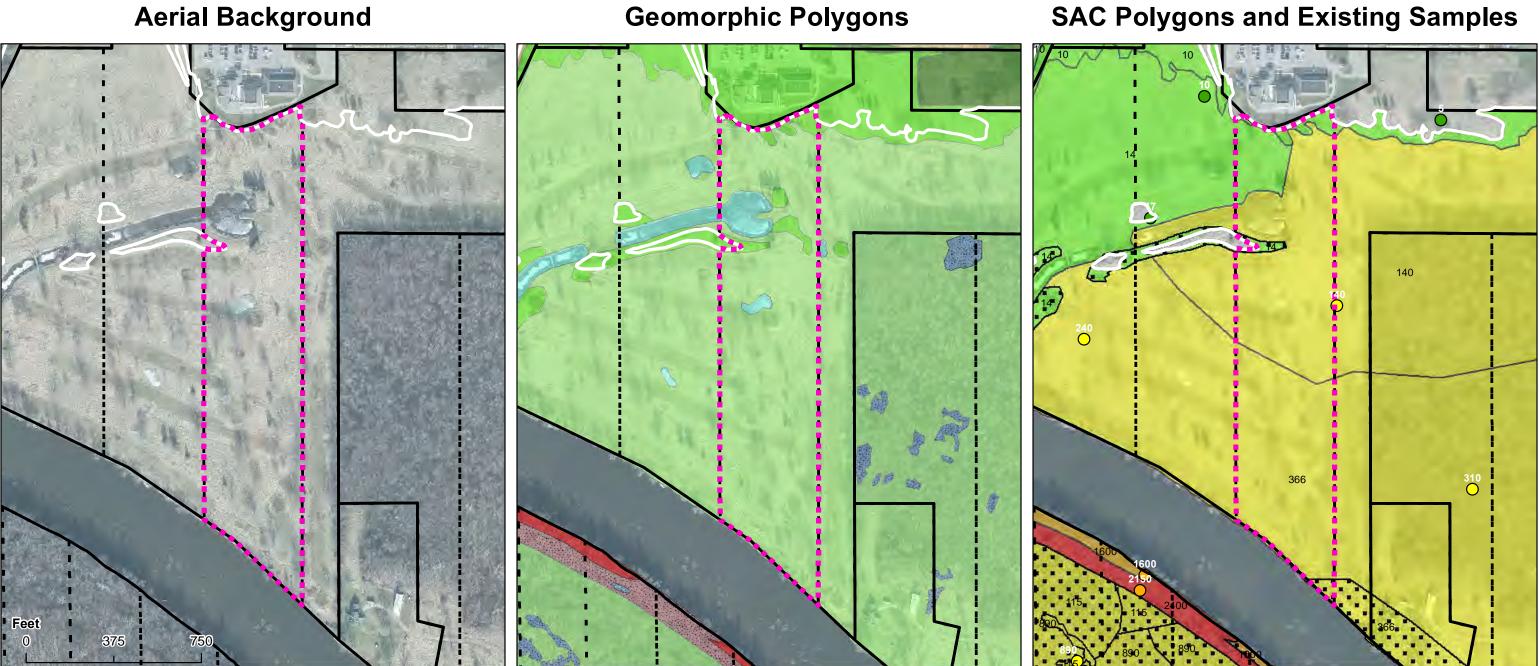
SAC Polygons and Existing Samples



Decision Unit ID – S7_051a_DU02 Tittabawassee River Floodplain Post-Removal Site Control Plan Appendix B

Figure S7_051a _2

Area of DU: 18.19 acres





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Decision Unit ID – S7_051a_DU03 Tittabawassee River Floodplain Post-Removal Site Control Plan Appendix B

Figure S7_051a _3

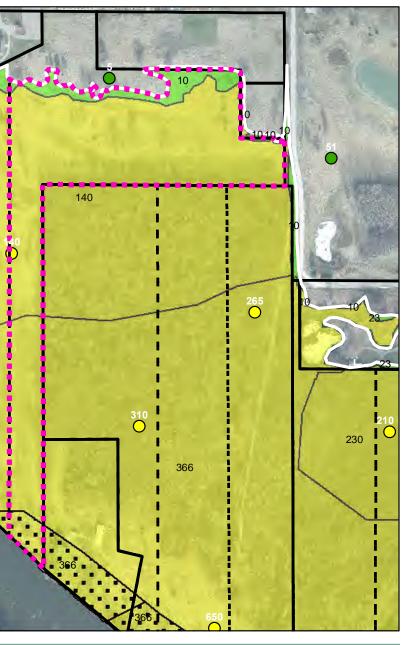
Area of DU: 18.28 acres

Aerial Background Geomorphic Polygons Fee 400



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SAC Polygons and Existing Samples



Decision Unit ID – S7_051a_DU04 S7_051a Tittabawassee River Floodplain Post-Removal Site Control Plan Appendix B

Figure

_4

Geomorphic Polygons 140 366 **DU01** DU01 DUO2 DUO3 DUO2 DUO3 DU04 DU04 **ATPOLICY**

Aerial Background





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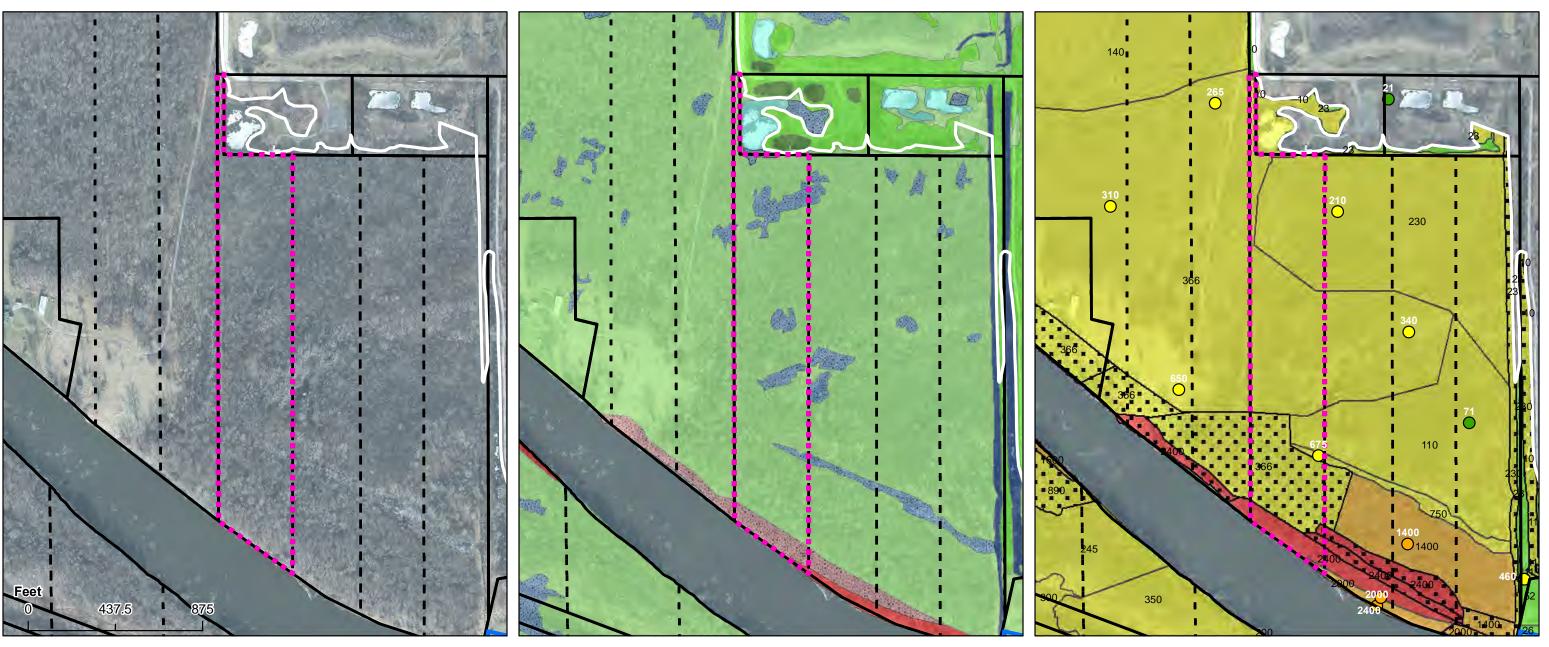
SAC Polygons and Existing Samples



Tittabawassee River Floodplain Post-Removal Site Control Plan Appendix B

Figure S7_056 Area of DU: 17.23 acres

Aerial Background



Geomorphic Polygons

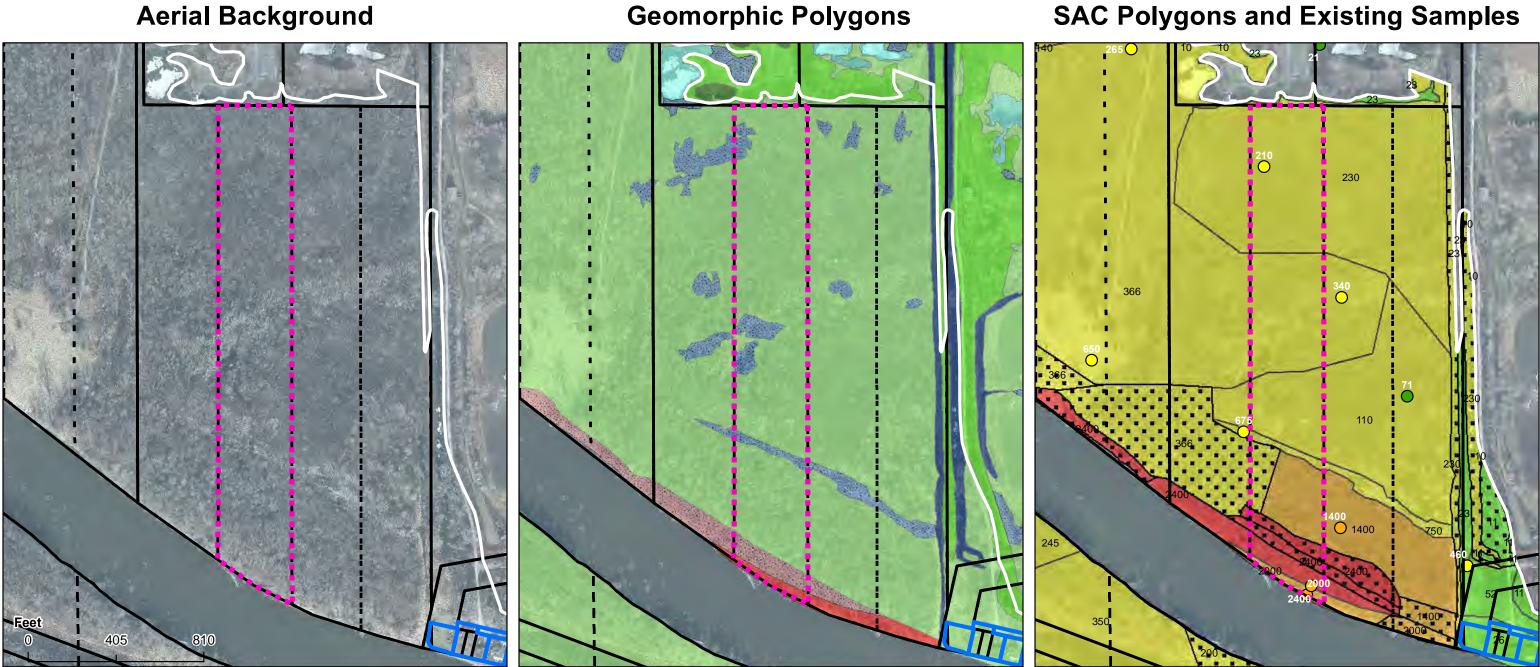


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SAC Polygons and Existing Samples

Decision Unit ID – S7_056_DU01 Tittabawassee River Floodplain Post-Removal Site Control Plan Appendix B

Area of DU: 17.24 acres



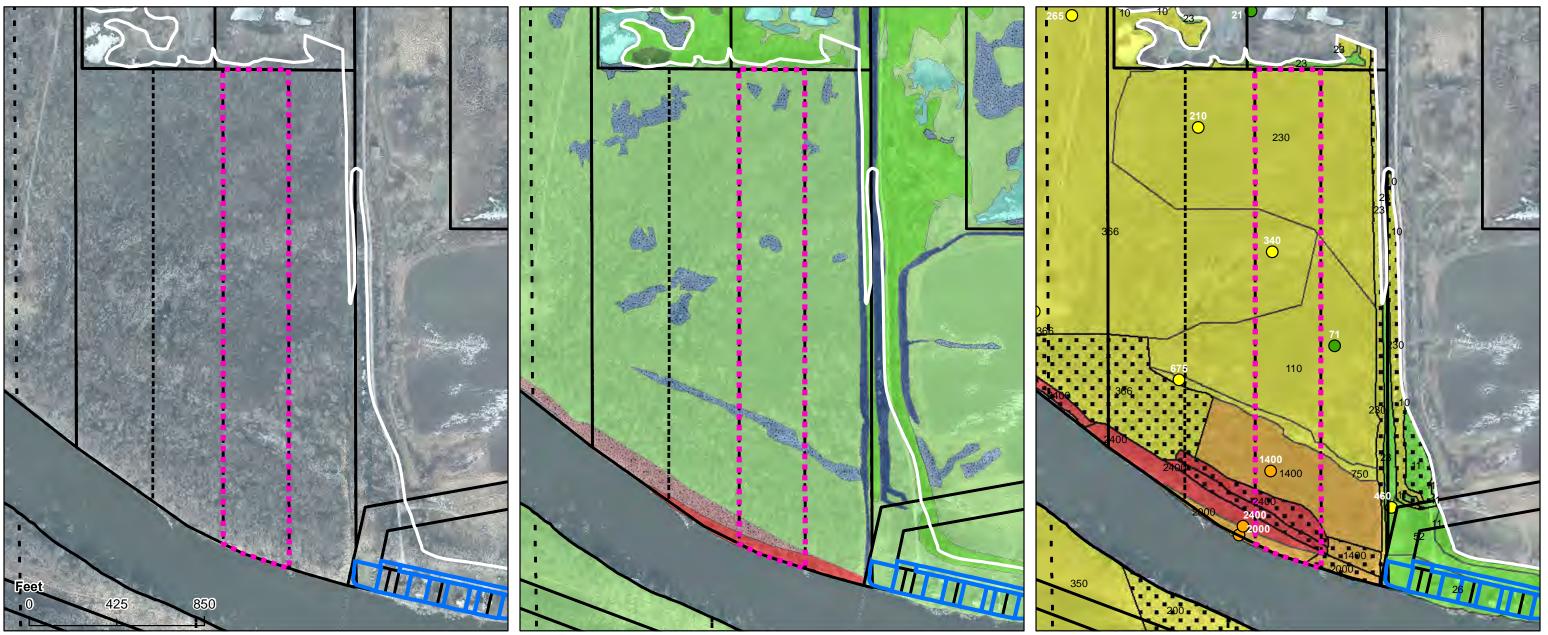


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Decision Unit ID – S7_056_DU02 Tittabawassee River Floodplain Post-Removal Site Control Plan Appendix B

Area of DU: 17.31 acres





Geomorphic Polygons





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SAC Polygons and Existing Samples

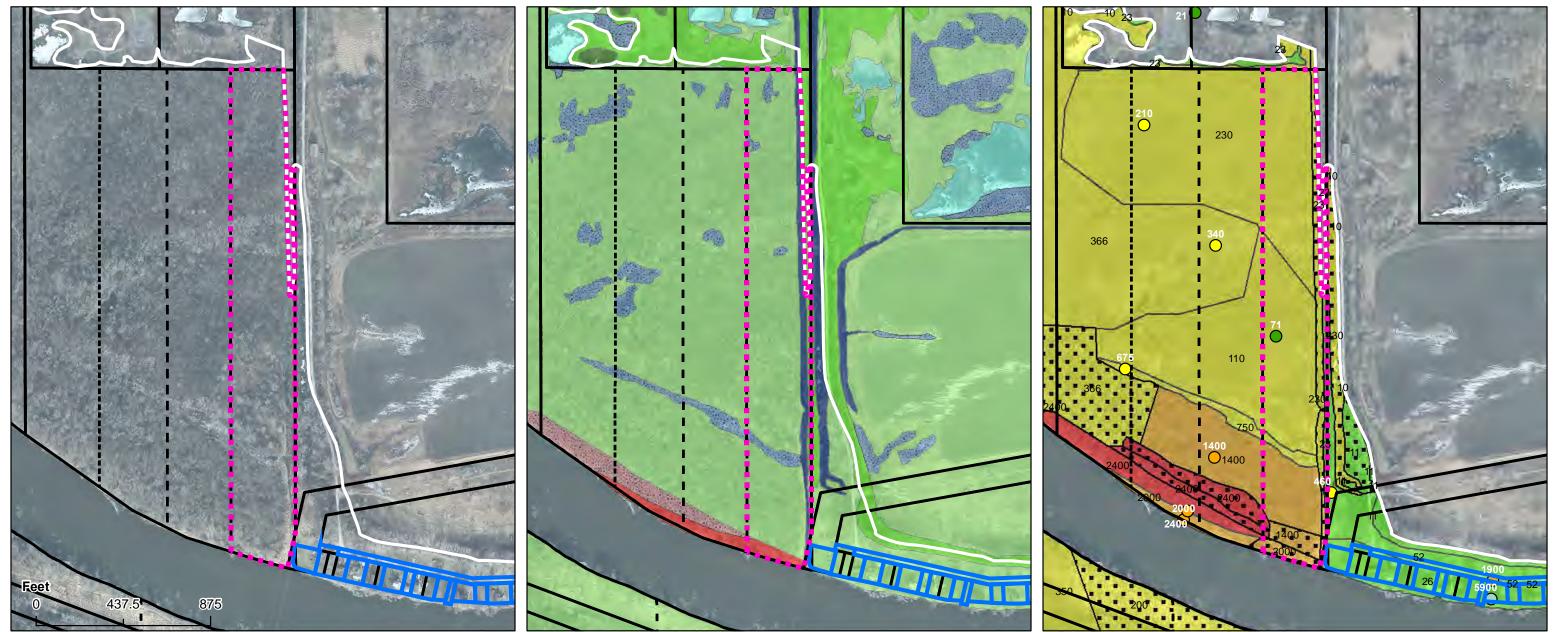
Decision Unit ID – S7_056_DU03 Tittabawassee River Floodplain Post-Removal Site Control Plan Appendix B

Area of DU: 17.30 acres

Aerial Background





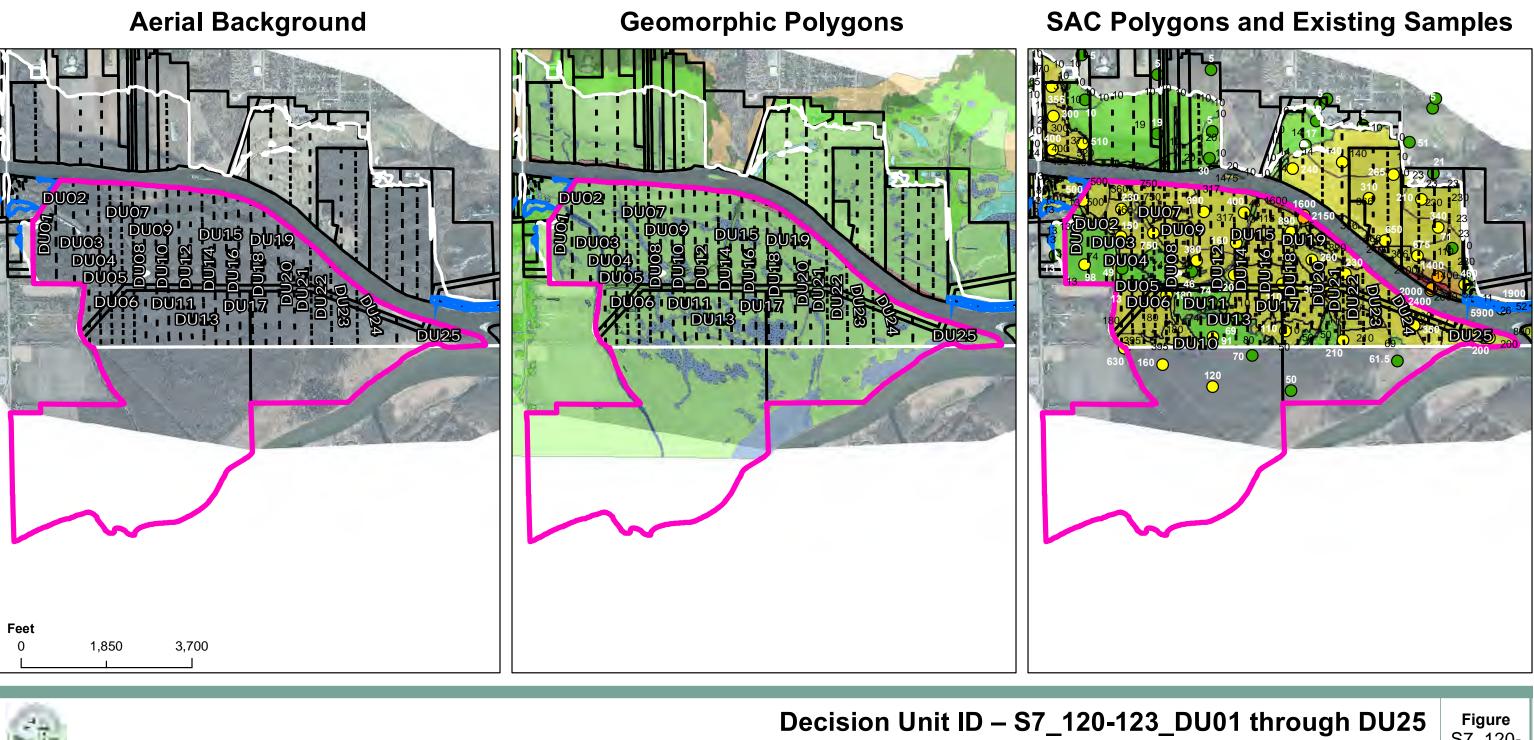




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SAC Polygons and Existing Samples

Decision Unit ID – S7_056_DU04 Tittabawassee River Floodplain Post-Removal Site Control Plan Appendix B





Tittabawassee River Floodplain Post-Removal Site Control Plan Appendix B

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S7_120-123

Area of DU: 18.65 acres

Aerial Background



Geomorphic Polygons





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SAC Polygons and Existing Samples

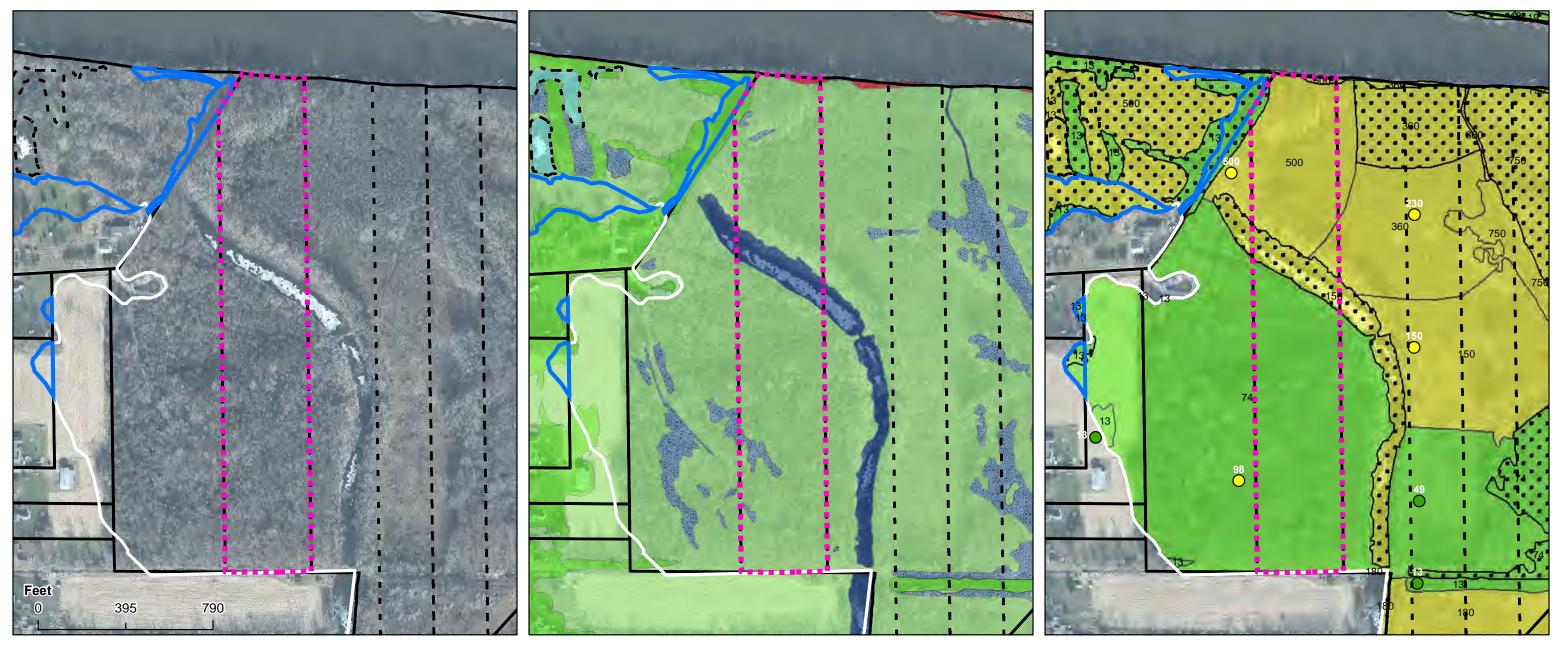
Decision Unit ID – S7_120-123_DU01 Tittabawassee River Floodplain Post-Removal Site Control Plan Appendix B

Figure S7_120-123_1

Area of DU: 19.88 acres

Aerial Background

Geomorphic Polygons





Decision Unit ID – S7_120-123_DU02 Tittabawassee River Floodplain Post-Removal Site Control Plan Appendix B

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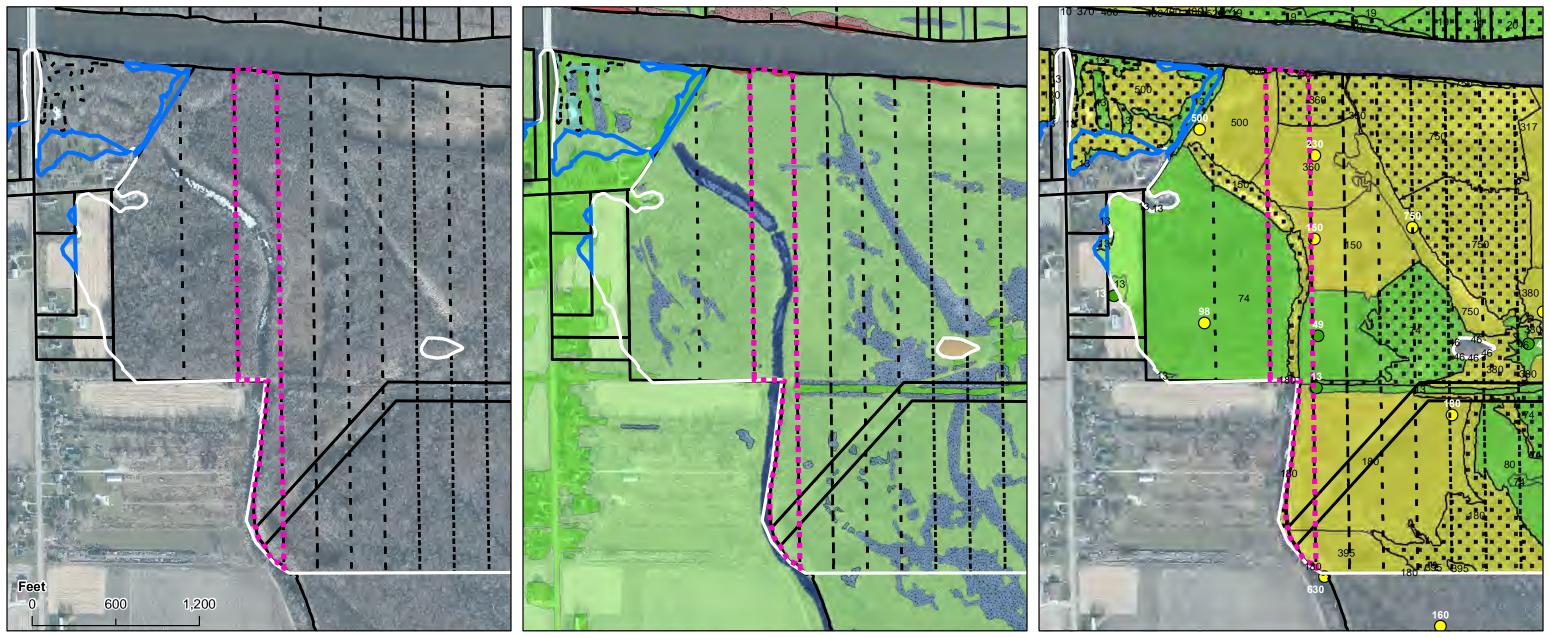
SAC Polygons and Existing Samples

Figure S7_120-123_2

Aerial Background



SAC Polygons and Existing Samples





Decision Unit ID – S7_120-123_DU03 Tittabawassee River Floodplain Post-Removal Site Control Plan Appendix B

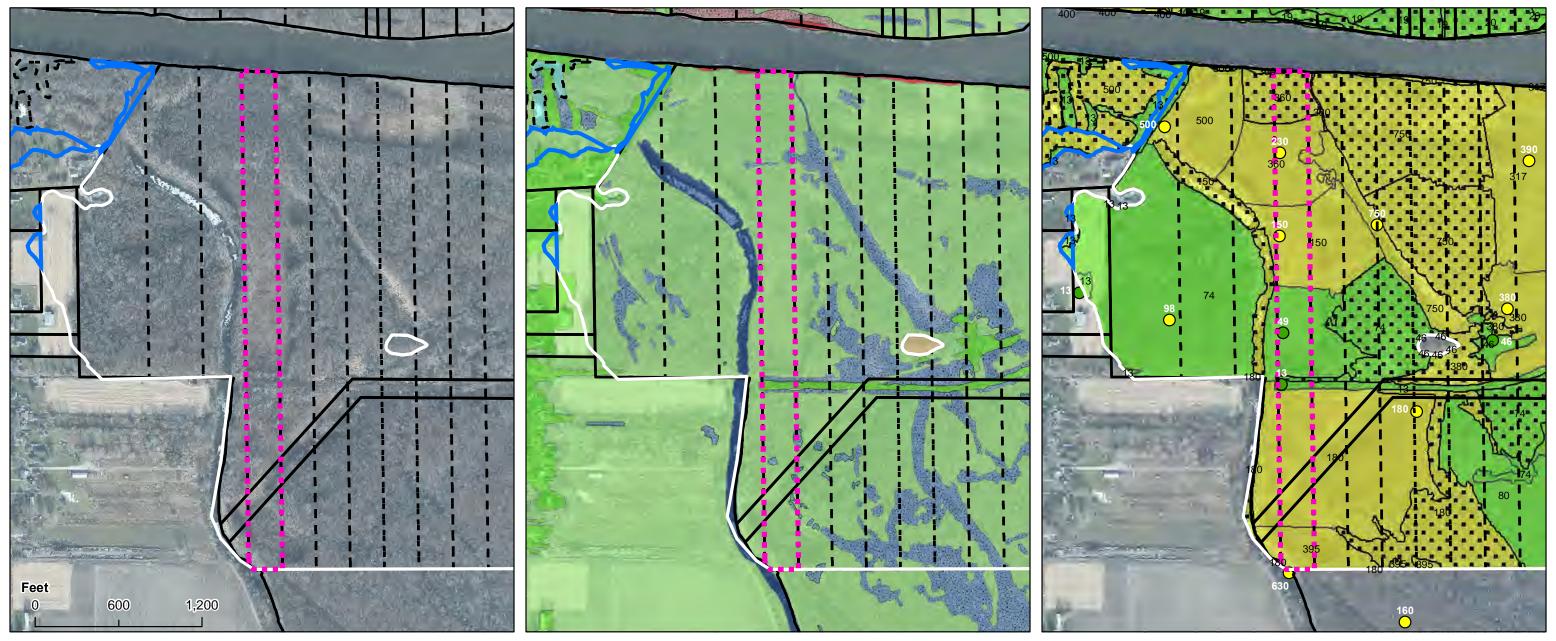
Rev 0 — July 27th, 2021

Figure S7_120-123_3 Area of DU: 19.92 acres

Aerial Background









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SAC Polygons and Existing Samples

Decision Unit ID – S7_120-123_DU04 Tittabawassee River Floodplain Post-Removal Site Control Plan Appendix B

Area of DU: 20.00 acres

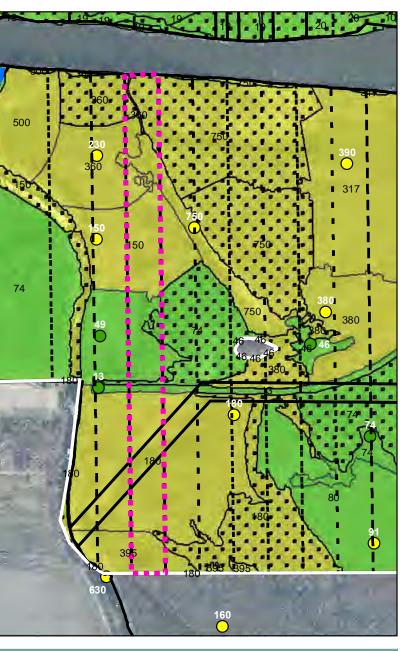
Aerial Background Geomorphic Polygons Feet 1,200 0 600

Decision Unit ID – S7_120-123_DU05 Tittabawassee River Floodplain Post-Removal Site Control Plan Appendix B

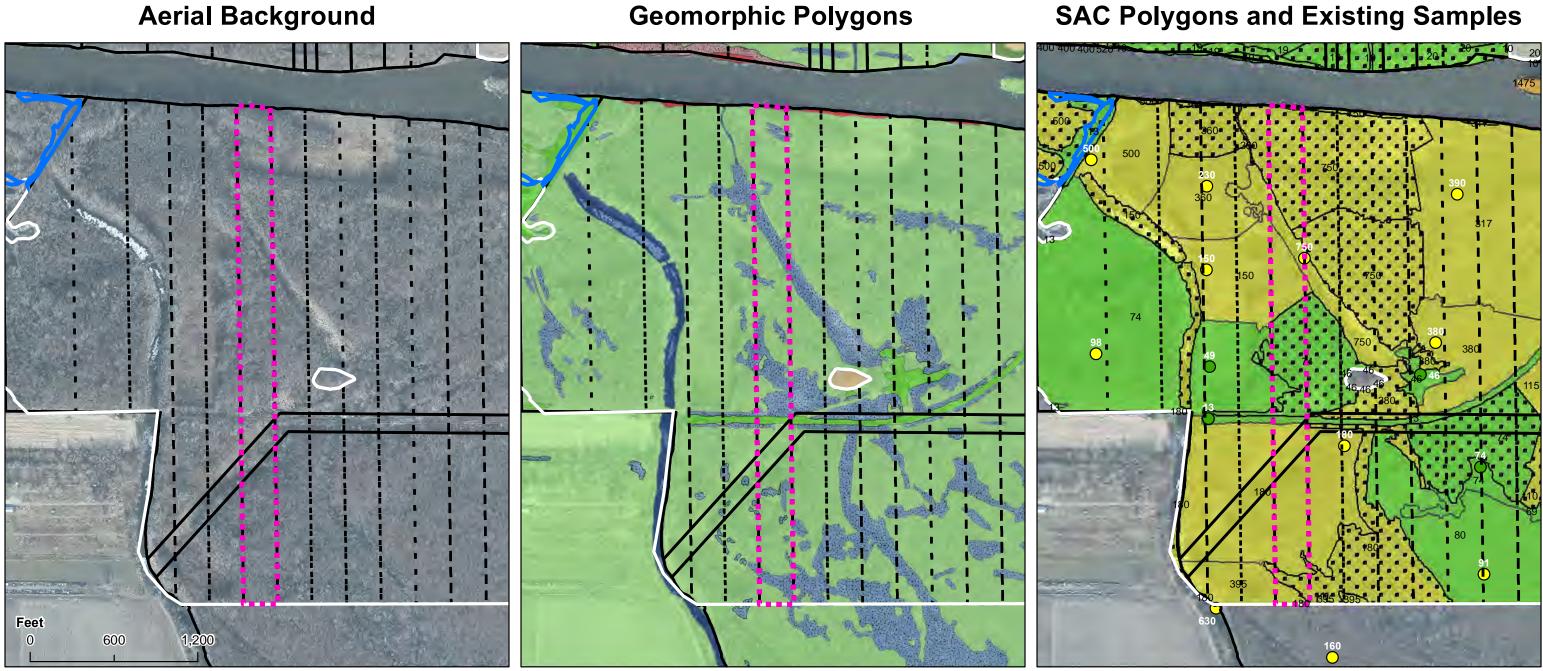


Rev 0 — July 27th, 2021

SAC Polygons and Existing Samples



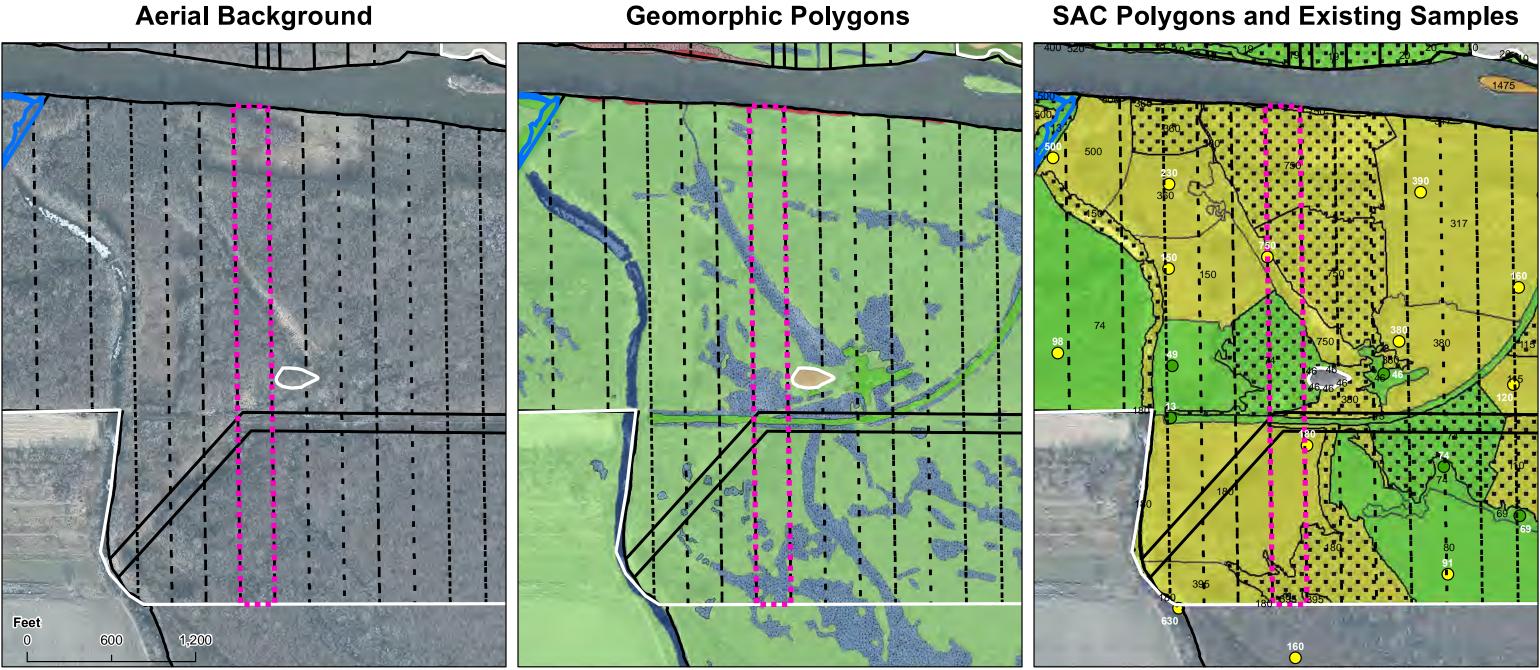
Area of DU: 20.05 acres





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Decision Unit ID – S7_120-123_DU06 Tittabawassee River Floodplain Post-Removal Site Control Plan Appendix B





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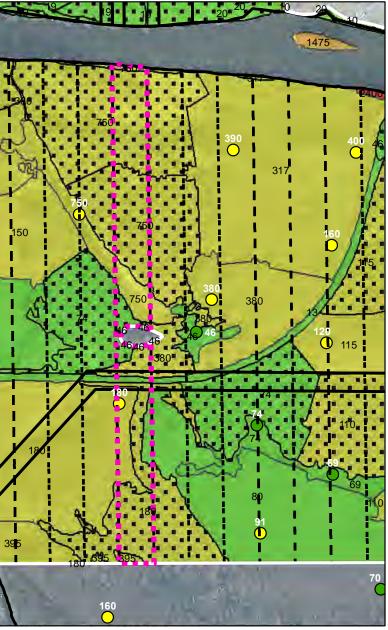
Decision Unit ID – S7_120-123_DU07 Tittabawassee River Floodplain Post-Removal Site Control Plan Appendix B

Area of DU: 19.48 acres

Aerial Background Geomorphic Polygons SAC Polygons and Existing Samples 20 20 500 Feet 1,200 0 600



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Decision Unit ID – S7_120-123_DU08 Tittabawassee River Floodplain Post-Removal Site Control Plan Appendix B

Area of DU: 19.96 acres

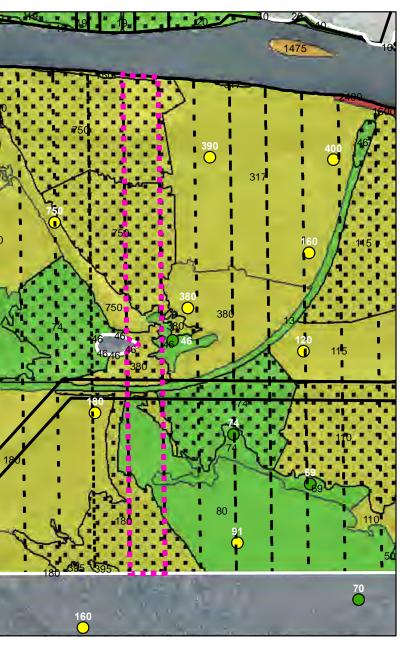
Aerial Background Geomorphic Polygons Feet 1,200 0 600

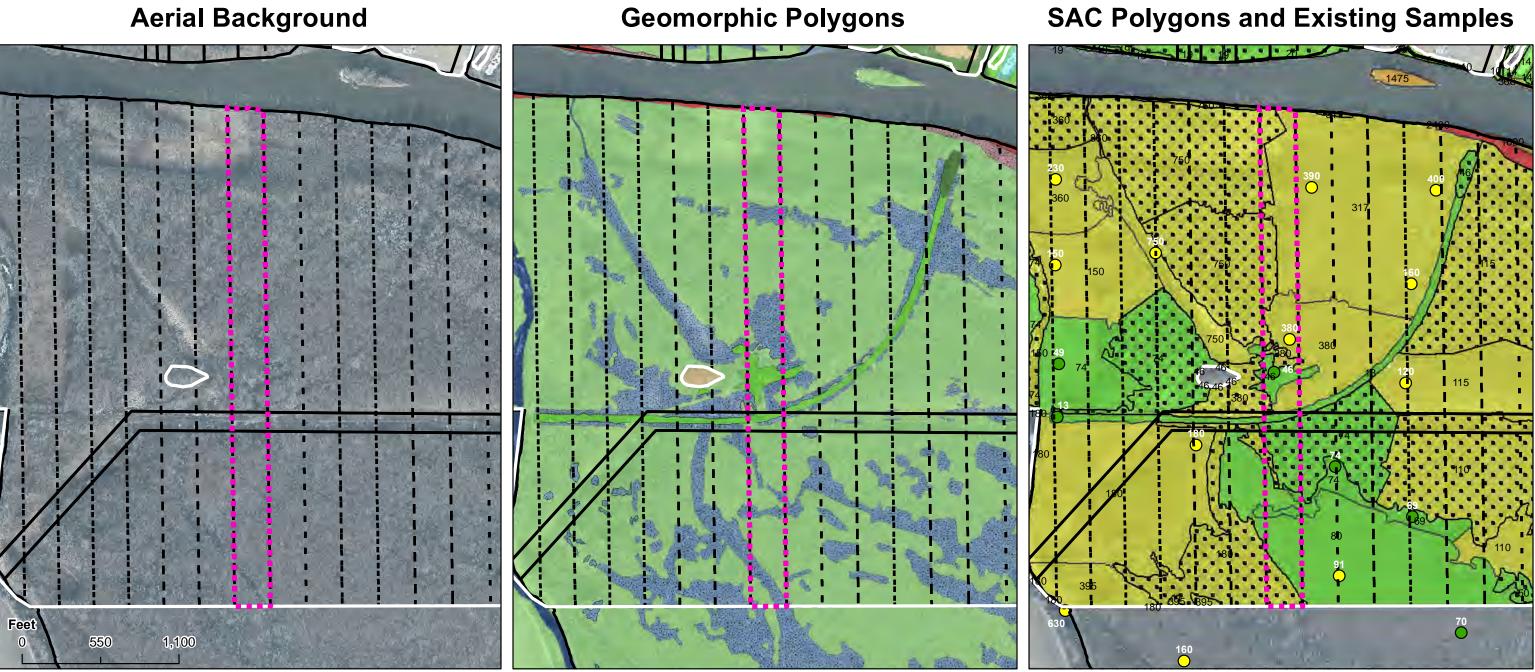
Decision Unit ID – S7_120-123_DU09 Tittabawassee River Floodplain Post-Removal Site Control Plan Appendix B



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SAC Polygons and Existing Samples





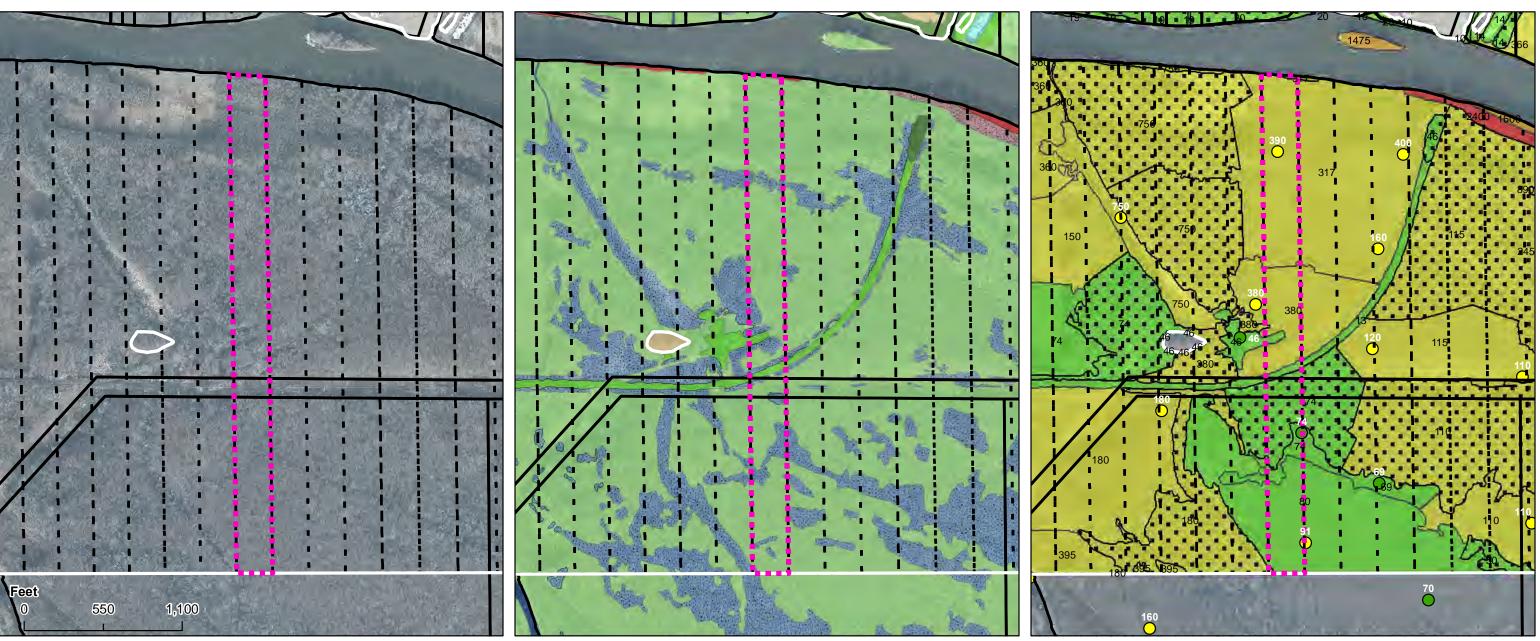


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Decision Unit ID – S7_120-123_DU10 Tittabawassee River Floodplain Post-Removal Site Control Plan Appendix B

Area of DU: 20.04 acres

Aerial Background



Geomorphic Polygons





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SAC Polygons and Existing Samples

Decision Unit ID – S7_120-123_DU11 Tittabawassee River Floodplain Post-Removal Site Control Plan Appendix B

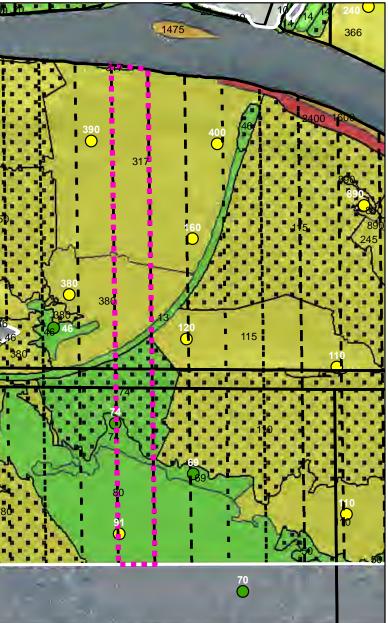
Area of DU: 20.01 acres

Aerial Background Geomorphic Polygons SAC Polygons and Existing Samples 70 () Feet 1,100 550



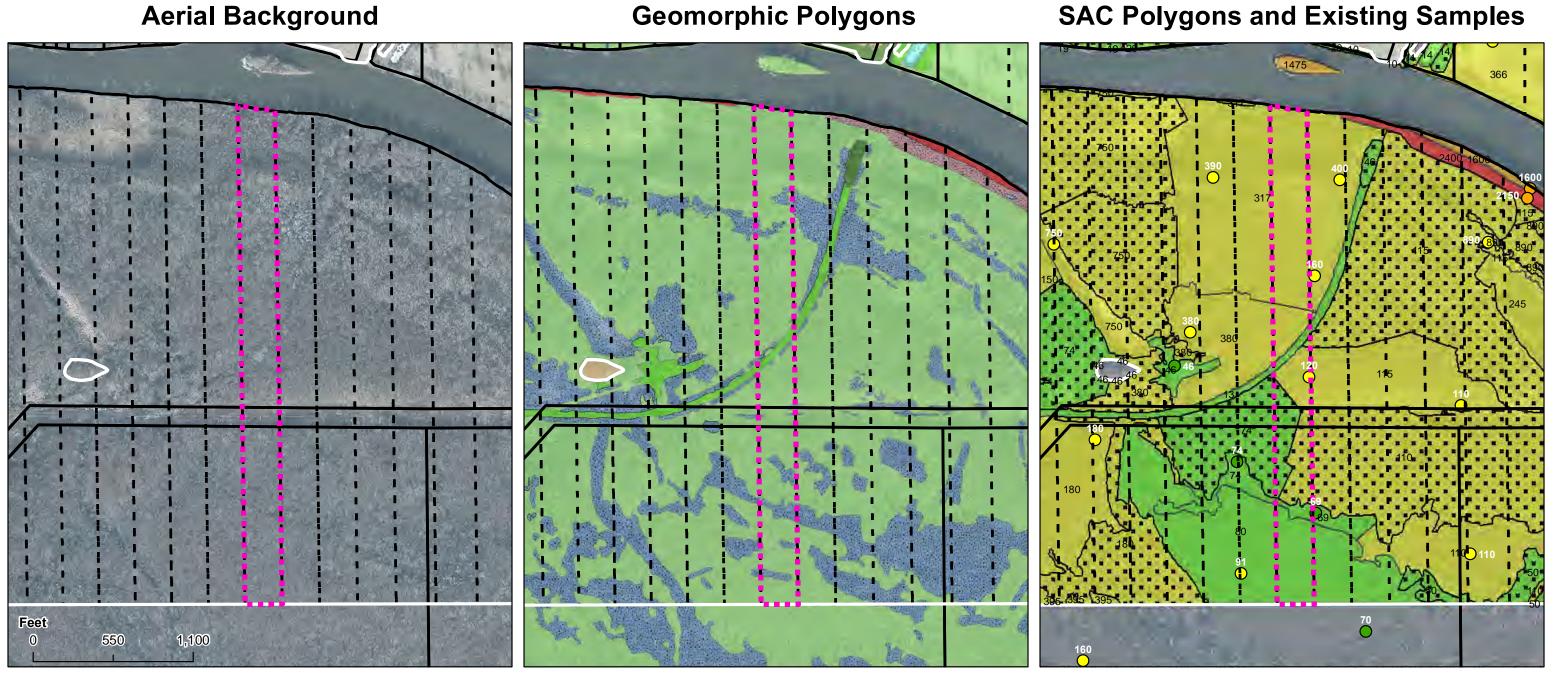
Decision Unit ID – S7_120-123_DU12 Tittabawassee River Floodplain Post-Removal Site Control Plan Appendix B

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Area of DU: 19.97 acres

Aerial Background





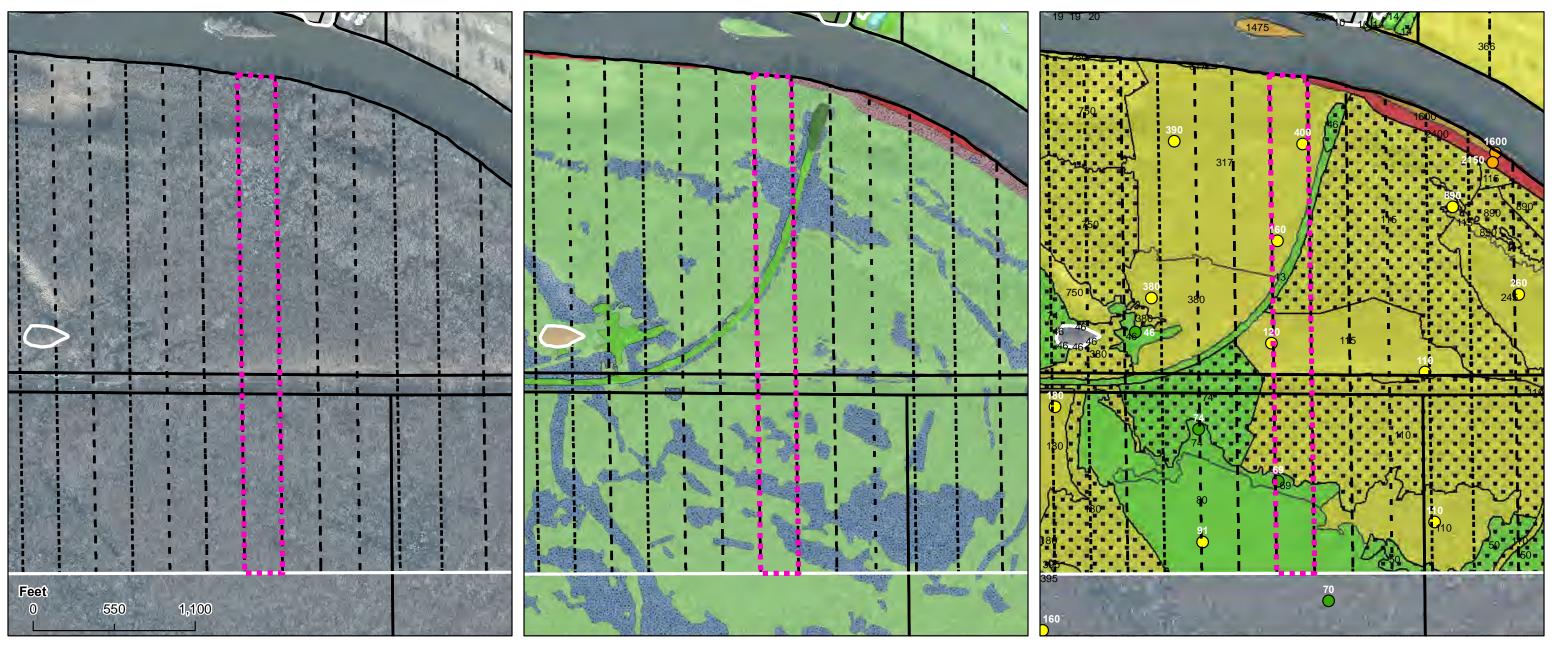
Decision Unit ID – S7_120-123_DU13 Tittabawassee River Floodplain Post-Removal Site Control Plan Appendix B

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SAC Polygons and Existing Samples

Area of DU: 20.00 acres

Aerial Background



Geomorphic Polygons



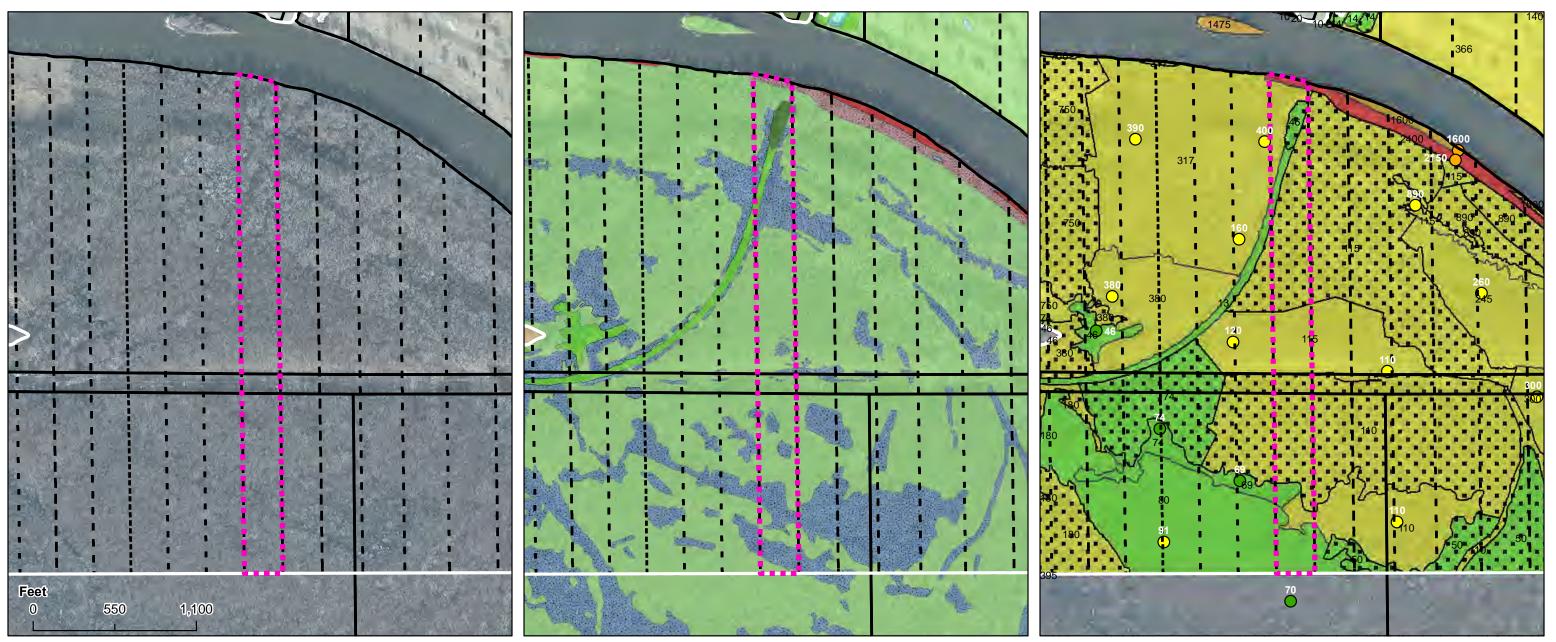
Decision Unit ID – S7_120-123_DU14 Tittabawassee River Floodplain Post-Removal Site Control Plan Appendix B

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SAC Polygons and Existing Samples

Area of DU: 20.01 acres

Aerial Background



Geomorphic Polygons



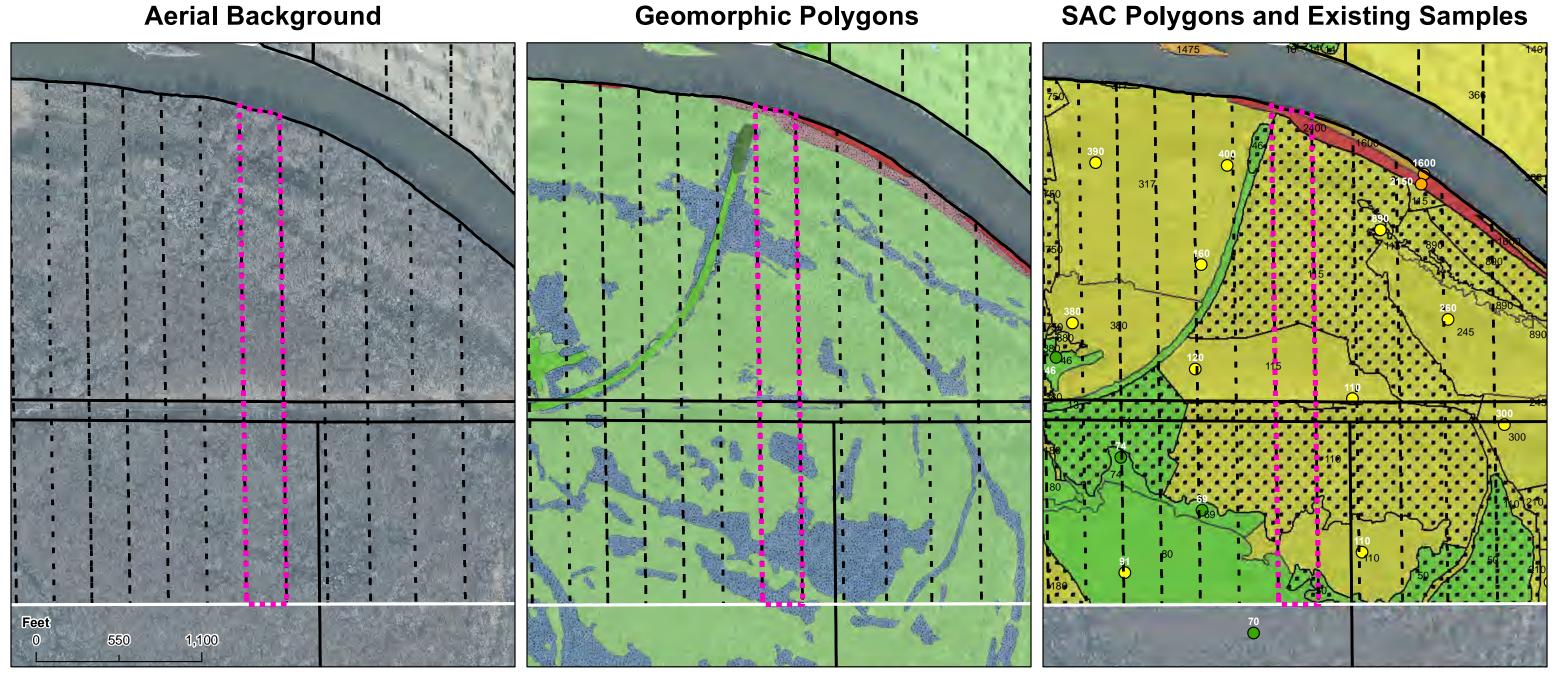
Decision Unit ID – S7_120-123_DU15 Tittabawassee River Floodplain Post-Removal Site Control Plan Appendix B

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SAC Polygons and Existing Samples

Area of DU: 20.01 acres

Aerial Background





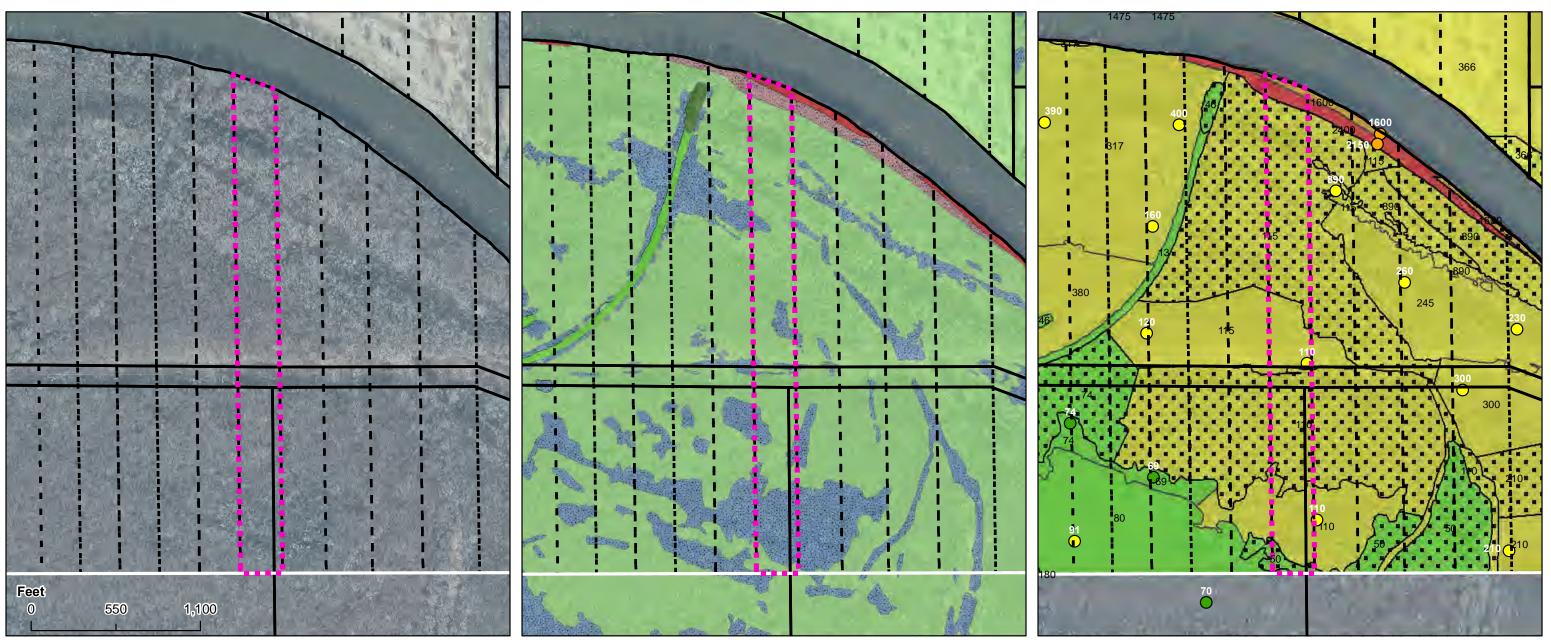
Decision Unit ID – S7_120-123_DU16 Tittabawassee River Floodplain Post-Removal Site Control Plan Appendix B

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SAC Polygons and Existing Samples

Area of DU: 20.08 acres

Aerial Background



Geomorphic Polygons



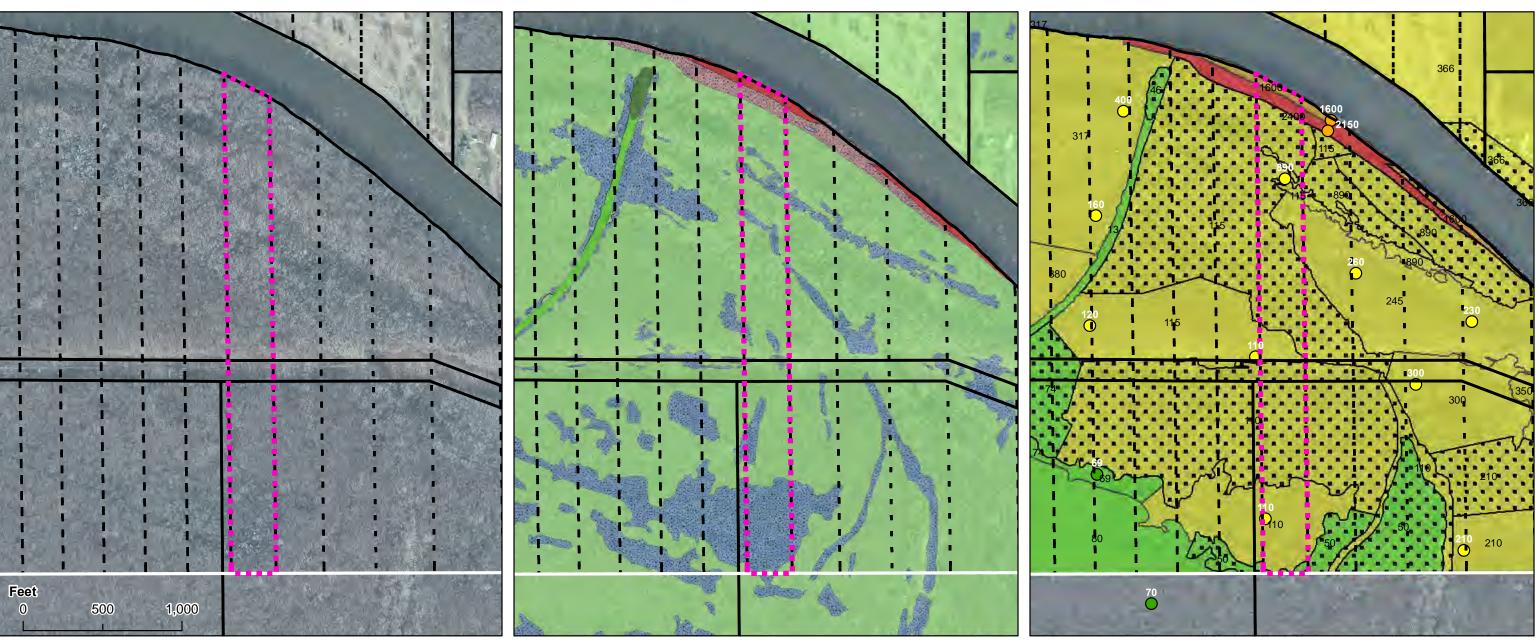
Decision Unit ID – S7_120-123_DU17 Tittabawassee River Floodplain Post-Removal Site Control Plan Appendix B

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SAC Polygons and Existing Samples

Area of DU: 20.02 acres

Aerial Background



Geomorphic Polygons

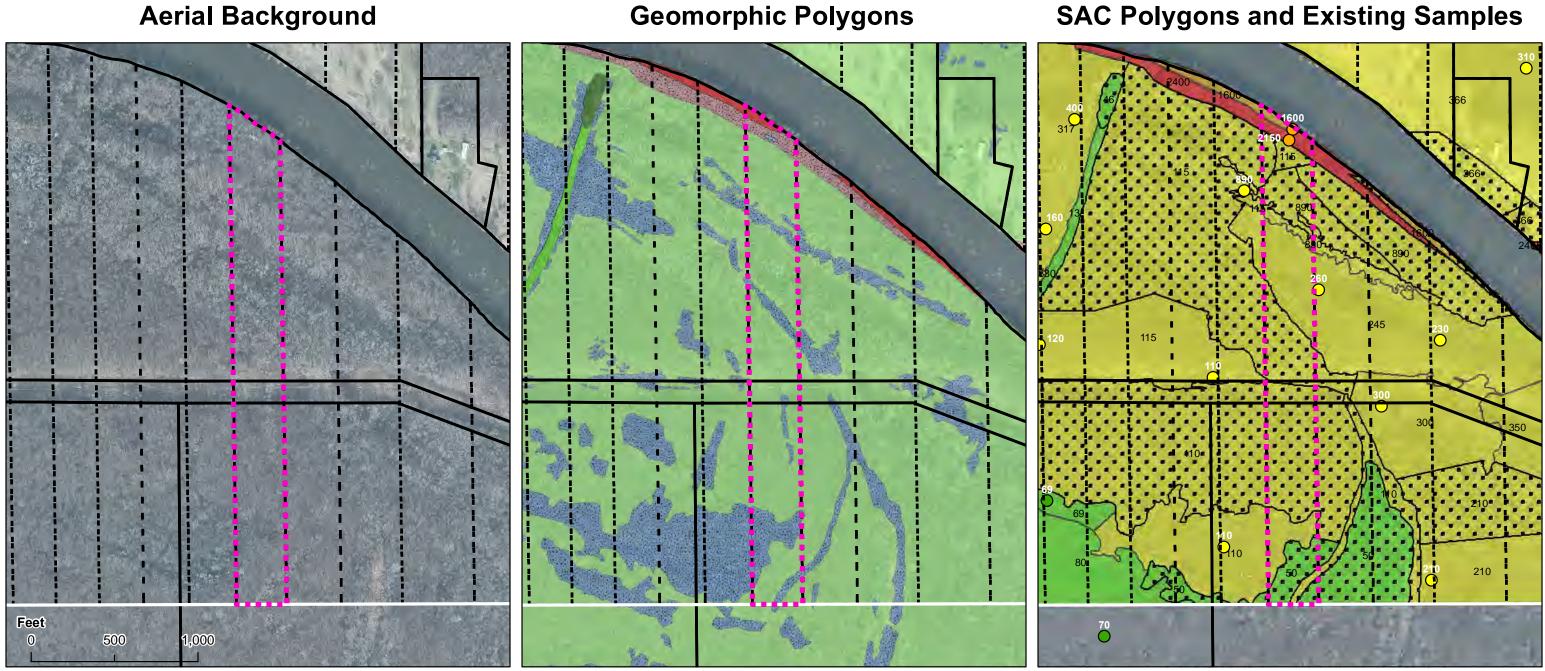


Decision Unit ID – S7_120-123_DU18 Tittabawassee River Floodplain Post-Removal Site Control Plan Appendix B

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SAC Polygons and Existing Samples

Area of DU: 20.03 acres



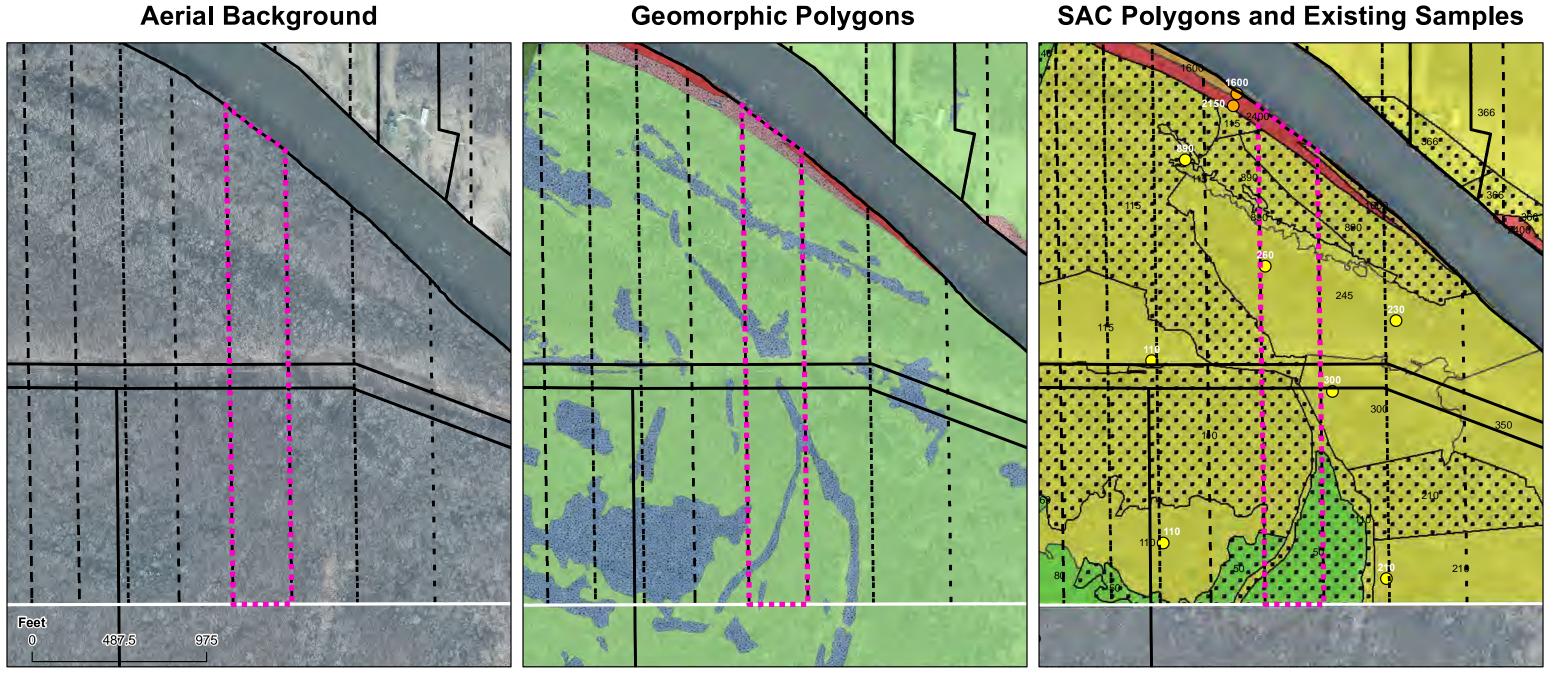


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Decision Unit ID – S7_120-123_DU19 Tittabawassee River Floodplain Post-Removal Site Control Plan Appendix B

Area of DU: 20.04 acres

Aerial Background







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SAC Polygons and Existing Samples

Decision Unit ID – S7_120-123_DU20 Tittabawassee River Floodplain Post-Removal Site Control Plan Appendix B

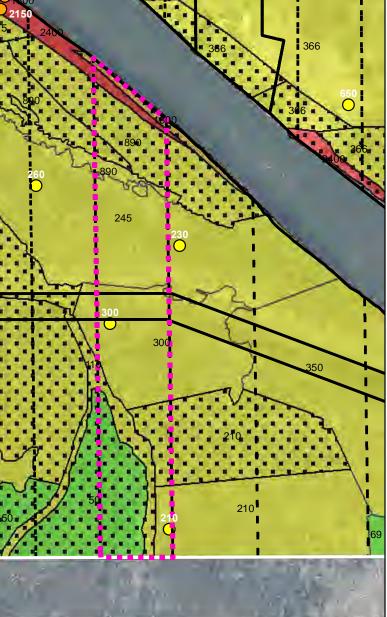
Area of DU: 20.07 acres

SAC Polygons and Existing Samples **Aerial Background Geomorphic Polygons** 210 Feet 890 445 1



Decision Unit ID – S7_120-123_DU21 Tittabawassee River Floodplain Post-Removal Site Control Plan Appendix B

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Area of DU: 20.15 acres

Aerial Background Geomorphic Polygons Feet 780 390 .



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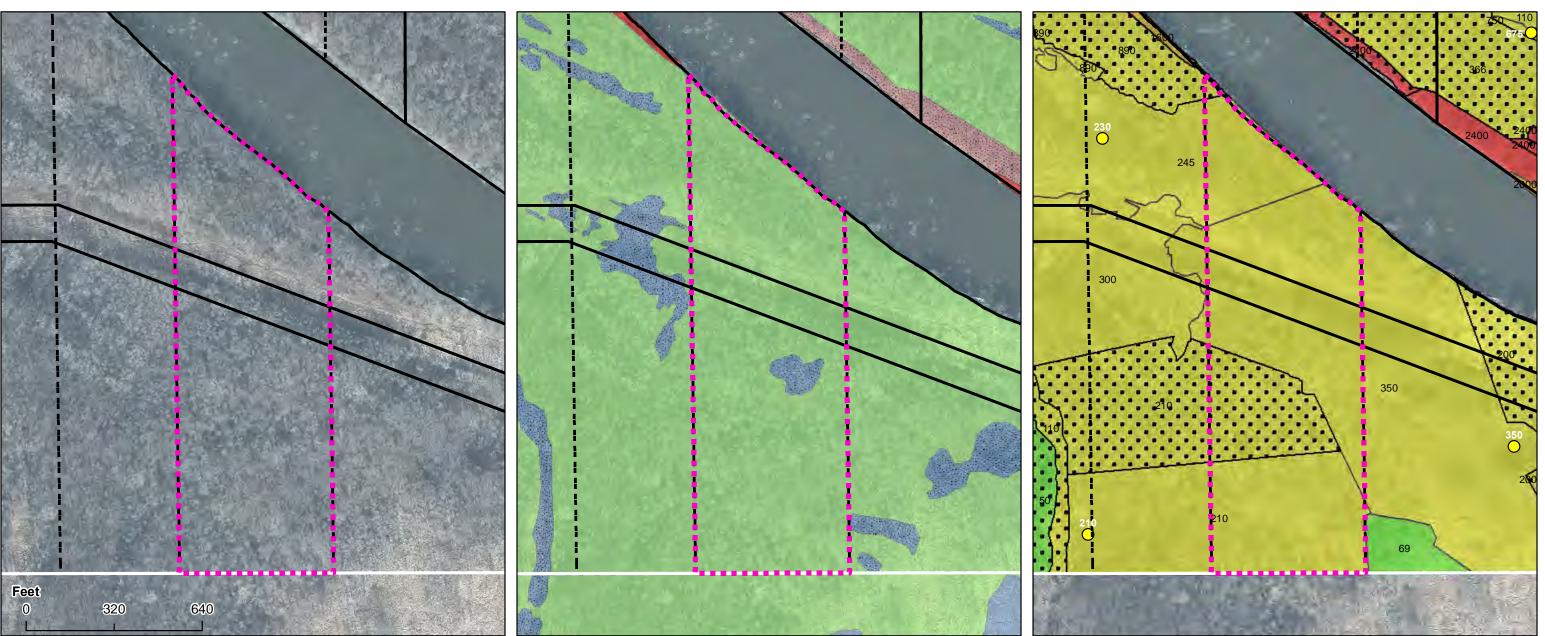
SAC Polygons and Existing Samples



Decision Unit ID – S7_120-123_DU22 Tittabawassee River Floodplain Post-Removal Site Control Plan Appendix B

Area of DU: 19.96 acres

Aerial Background



Geomorphic Polygons





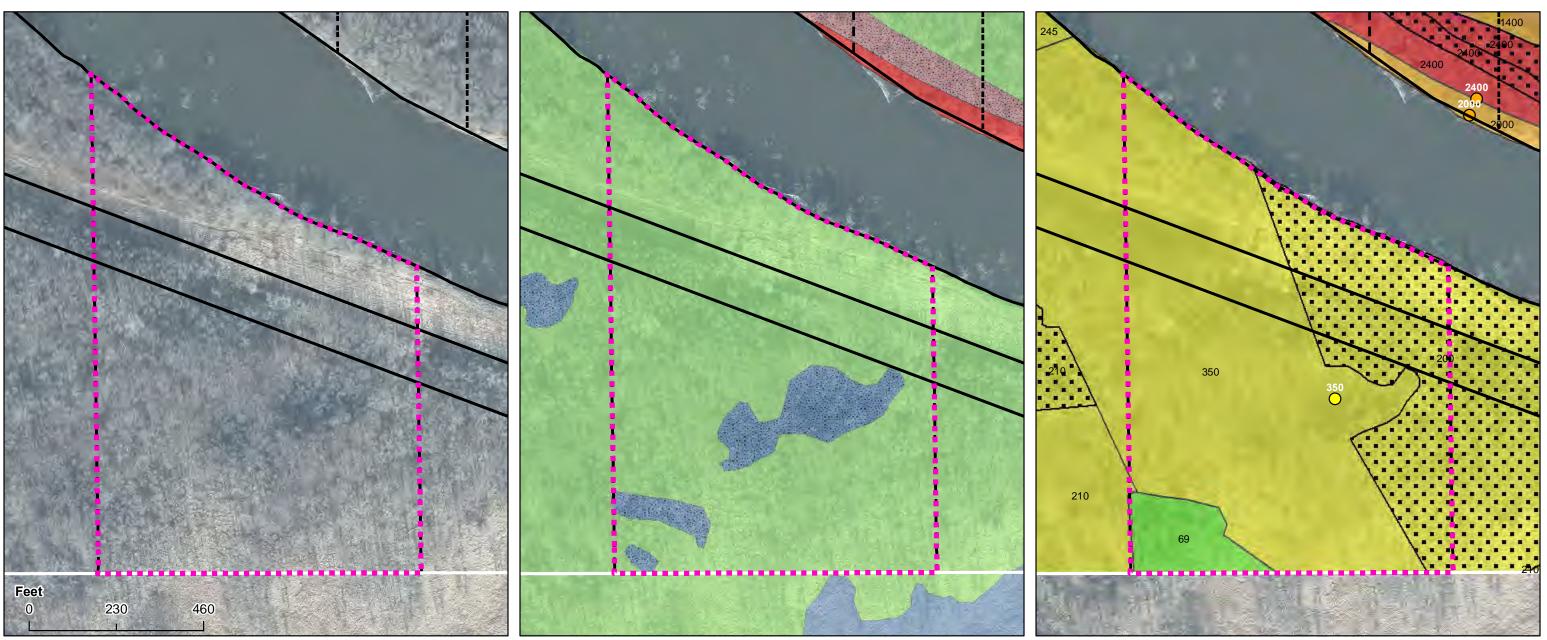
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SAC Polygons and Existing Samples

Decision Unit ID – S7_120-123_DU23 Tittabawassee River Floodplain Post-Removal Site Control Plan Appendix B

Area of DU: 20.14 acres

Aerial Background



Geomorphic Polygons





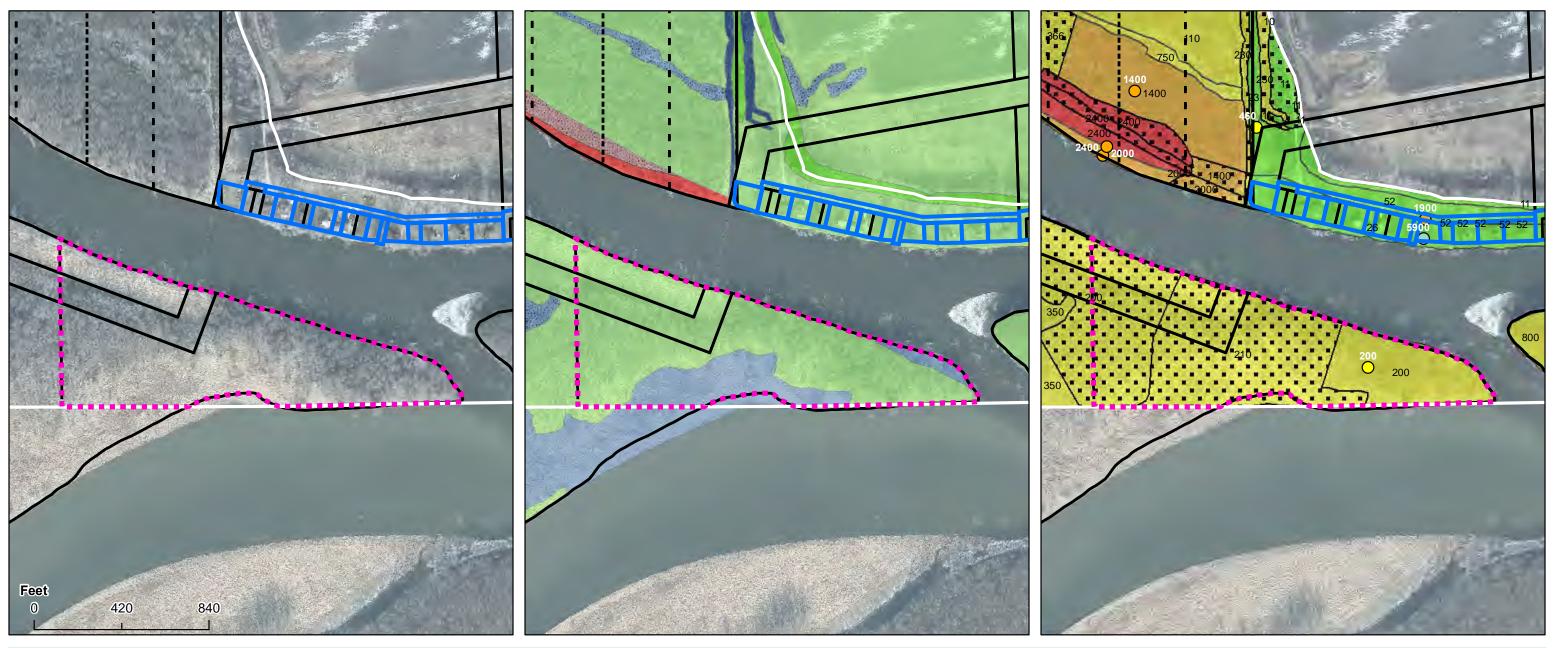
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SAC Polygons and Existing Samples

Decision Unit ID – S7_120-123_DU24 Tittabawassee River Floodplain Post-Removal Site Control Plan Appendix B

Area of DU: 20.32 acres

Aerial Background



Geomorphic Polygons



Decision Unit ID – S7_120-123_DU25 Tittabawassee River Floodplain Post-Removal Site Control Plan Appendix B

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SAC Polygons and Existing Samples