



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

March 13, 2006

REPLY TO THE ATTENTION OF:

Kim D. Tucker-Billingslea
GM WFG – Remediation Team
PCC Central M/C: 483-520-190
2000 Centerpoint Parkway
Pontiac, Michigan 48341

RE: Response to Comments and Final Decision
General Motors – Livonia Site
MID 005 356 621

Dear Ms. Billingslea:

The United States Environmental Protection Agency (U.S. EPA) has selected the final corrective action remedy for the General Motors site, located at 13000 Eckles Road, Livonia, Michigan. Enclosed is the U.S. EPA's Final Decision as well as the Response to Comments from the public.

The remedy includes soil excavation, engineering and institutional controls, implementation of a French drain collection system and barrier wall, a groundwater treatment system and a groundwater monitoring program with a contingency plan at on-site and off-site areas. These mechanisms will be used to address soil and groundwater contamination as well as future land use at the site.

The next step in the process will be negotiating an administrative order on consent requiring General Motors to implement the final remedy. I will be in contact with you in the near future to discuss the process.

If you have any questions about the above matter, please contact me at (312) 886-0656.

Sincerely,

A handwritten signature in black ink, reading "Daniel Patulski", is written over a horizontal line.

Daniel Patulski
EPA Project Manager

Enclosures

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

**RCRA FINAL DECISION
AND RESPONSE TO COMMENTS
SELECTION OF REMEDIAL ALTERNATIVE**

FOR

**GENERAL MOTORS CORPORATION
13000 ECKLES ROAD SITE
LIVONIA, MICHIGAN**

**FINAL DECISION AND RESPONSE TO COMMENTS
SELECTION OF REMEDIAL ALTERNATIVE
FOR
GENERAL MOTORS CORPORATION
13000 EKLES ROAD SITE
LIVONIA, MICHIGAN**

Introduction

The United States Environmental Protection Agency (U.S. EPA) presents this Resource Conservation and Recovery Act (RCRA) Final Decision and Response to Comments for the General Motors facility, located on 13000 Eckles Road, Livonia, Michigan. Included in this document is the previously issued Statement of Basis (Attachment 1). The Statement of Basis outlined remedial alternatives possible at the facility as well as U.S. EPA's proposed remedy and was made available to the public for review and comment on September 2, 2005. The public was notified of the public comment period in the local Livonia Observer Newspaper. There were a number of comments received during the 45-day public comment period, which ended October 18, 2005.

Selected Remedy

U.S. EPA has selected the following remedial actions as the remedy to address contaminated media at the General Motors facility:

To address soil contamination:

- Soil excavation/removal at AOI 5, AOI 27, AOI 31, AOI 37
- Engineering and Institutional controls at AOI 39

To address groundwater contamination:

- French drain collection system and barrier wall in Area 1
- Groundwater treatment system at AOI 31
- Implementation of annual groundwater monitoring program, including LNAPL removal, with contingency plan at on-site and off-site areas.

To address land use:

Institutional controls will be imposed in all site areas where risk based levels do not meet drinking water standards.

Public Participation

The public comment period was announced through a newspaper advertisement in the Livonia Observer newspaper. The public comment period ran from September 2, 2005 through October 18, 2005. The Statement of Basis and supporting Administrative Record were placed in the Livonia Public Library in Livonia, Michigan and the U.S. EPA, Region 5, Waste, Pesticides and Toxics Division office for public review prior to and during the public comment period.

Public Comments and Concerns

Presented below are the significant comments received during the public comment period and the responses to them:

1. **Comment:** Several meeting attendees requested that soil on their property be tested for chemicals of concern associated with the GM facility.

Response: Soil samples were collected both on-site and off-site of the GM property (Figure 1) to address the public's concern about potential releases from the GM facility onto residential properties southeast of the facility. The sampling took place on December 7 and was designed to address potential releases of PCBs and TCE from the site in areas which had the greatest likelihood of being contaminated via an airborne route of transport. Separate samples were collected for PCB and TCE analysis, conducted at U.S. EPA's Central Regional Laboratory in Chicago. The results of those analyses are attached to this document. Of the nine locations sampled for PCBs, eight locations did not show any presence of PCBs in the surficial soil (Table 1). PCBs were identified on the GM property at Location 1 at a concentration of 0.001 parts per million (ppm), which is well below any level of concern for human health. TCE was also sampled in soil at the same nine locations but was not detected at any location.

2. **Comment:** A commenter asked why arrangements were previously made to "sink" wells in their backyard but subsequently refused to do so?

Response: GM conducted a residential investigation in December 2000, using a geoprobe to collect groundwater samples in the right-of-way along Grantland Avenue. Based on those sample results and evaluation of groundwater flow in that area, a determination was made as to where to install monitoring wells to best

define the extent of the TCE impacted groundwater. It was concluded that installing monitoring wells in some of the previously considered back yards was not necessary or appropriate.

3. Comment: A commenter asked what are acceptable levels of PCBs and TCE?

Response: As a general premise, acceptable levels of contaminants such as PCBs and TCE are levels that provide adequate protection to the receptors (population) that are potentially being effected. The levels considered acceptable (safe) depend on a variety of factors, including the media (e.g., soil or groundwater) the receptor is being exposed to; the route of exposure (e.g., through direct contact to skin, inhalation or ingestion); the contaminant in question; and, the length of time the receptor is exposed. The Michigan Department of Environmental Quality (MDEQ) and U.S. EPA have developed screening levels that can be used to determine if further evaluation of the contaminant(s) is necessary. These screening levels are developed using all of the exposure variables in determining an acceptable concentration, and reflects the most conservative assessment of impacts on human health.

If contaminant concentrations at a facility or residence do not exceed the screening level, then it is generally considered protective of human health. If the concentrations are above the screening level, then a site specific risk assessment is performed to address the site specific exposure scenario that a person is subjected to, to determine what contaminant level is considered protective of human health.

For PCBs, the direct contact screening criteria in soil, developed under the MDEQ Part 201 Generic Cleanup Criteria for a residential scenario, is 4 parts per million (ppm). Under an industrial/commercial scenario, a concentration up to 22 ppm may be considered protective. For PCBs in groundwater using the Part 201 Criteria, the screening level for direct contact is 3.3 parts per billion (ppb). Results from data on PCB's were below direct contact screening criteria for both soil and groundwater and, therefore, protective of human health.

For TCE, the Part 201 screening criteria for direct contact in residential soil is 500 ppm, which is also the screening level for industrial/commercial use. For TCE in groundwater using the Part 201 criteria, the screening level for direct contact is 37,000 ppb. Results from data on TCE were below direct contact screening criteria for both soil and groundwater and, therefore, protective of human health.

4. Comment: A commenter asked for proof that gases can not be expelled from soil, water and wells?

Response: Contaminants found in soil and groundwater have the ability to volatilize out to air depending on a number of conditions that exist within the particular media. One of the significant factors in groundwater is the water solubility of a contaminant. The Michigan DEQ has established general criteria

for contaminant levels in soil and groundwater that are considered acceptable in meeting the "volatilization to indoor air inhalation criteria". For PCBs, the concentration in groundwater is 45 ppb and in soil is 3,000 ppm. For TCE, the concentration in groundwater is 15,000 ppb and in soil is 71 ppm. The acceptable levels in soil that volatilize to ambient air (outdoor air) are substantially higher than for the indoor scenario. For both PCB's and TCE, the levels in soil and groundwater were below the indoor air inhalation criteria and, therefore, protective of human health.

5. **Comment:** A commenter asked if a copy could be obtained of the final action on the corrective measures for the GM facility.

Response: A copy of the Response to Comments and Final Decision Document will be mailed to all participants who submitted comments and/or attended the public meeting on October 5, 2005.

6. **Comment:** A commenter requested a copy of a diagram or map with sections marked with numbers that were presented at the public meeting on October 5, 2005.

Response: A diagram of the facility layout that identifies the locations of AOIs is attached to this decision document.

7. **Comment:** A commenter asked why the city of Livonia denied the commenter the option of having a permit for a new groundwater well for non-potable use.

Response: The City of Livonia has authority to develop policies related to their community. The appropriate city officials should be contacted concerning their decisions made on behalf of the City.

8. **Comment:** A commenter wanted to know what the groundwater test results were for the wells located along the southern end of the GM property.

Response: Groundwater data have been generated at the GM property since around 1989 and continue to the present. Data are located in a number of reports, including the Current Conditions Report, the RFI Report and Supplemental RFI Report. These data were later evaluated and used to address a requirement for determining if migration of contaminated groundwater was under control. This determination was presented in the Environmental Indicator CA750 Report, dated October 2004. This report provides the best summary of the voluminous amount of groundwater data collected at the site and off-site of the property. The report is available at the Livonia Public Library under the title, "Resource Conservation and Recovery Act Environmental Indicator CA750 Report Determination of Migration of Contaminated Groundwater Under Control", October 28, 2004.

9. **Comment:** Concern was expressed over the potentially higher levels of contaminants historically in groundwater at the site than they are presently, (e.g., TCE) and the effects of exposure to the off-site residents.

Response: As was described under Response #8, groundwater data have been generated at the GM facility since around 1989. Prior to that time, neither GM nor the U.S. EPA have information regarding the concentrations of contaminants in groundwater at the site. It can not be determined exactly when the groundwater became contaminated and what the concentrations were initially.

10. **Comment:** A commenter asked that the U.S. EPA send a written statement from an outside source that supports U.S. EPA's accusation that gases are not expelled from the wells on resident's property.

Response: See Response # 4 above.

11. **Comment:** A commenter expressed concern over red dust that had blown onto their property in the past and settled on various structures. The dust would eat the paint off the cars. GM paid to have the cars repainted. The dust was apparently analyzed by Michigan Department of Environmental Quality and the result given to the residents was that the dust was vegetation.

Response: There was no record found or knowledge of any payment to refinish cars where paint had been effected by historical operations at the GM facility. During demolition activities, necessary and appropriate actions to comply with all federal, state and the Occupational Health and Safety Administration (OSHA) standards for worker and community safety were implemented. Additionally, the Wayne County Department of Environment, Air Quality Division, monitored activities at the site and did not find any nuisance dust problems.

12. **Comment:** A commenter asked to have soil tested on their property even though it was their belief that soil had already been tested when wells were put in on their property and requested that the sample results from soil and groundwater over the past 40 years be shared with the commenter.

Response: See Responses # 1 and # 8 for information on soil and groundwater results.

13. **Comment:** A commenter asked what determinations are made to label the property as a "Brownfield".

Response: The Small Business Liability Relief and Brownfields Revitalization Act defines a brownfield site as "real property, the expansion, redevelopment, or reuse of which may be complicated by the presence or potential presence of a hazardous substance, pollutant, or contaminant". It can include sites that are contaminated by petroleum or a petroleum product. There are criteria for a site to

qualify for Brownfields funding. Typically, sites such as the GM facility in Livonia do not qualify as a Brownfields site because it is being addressed under RCRA corrective action and is, therefore, exempt. However, there is an add-back procedure that allows some sites to get back into the Brownfields program. If a site meets those criteria, then an application needs to be completed and submitted to the U.S. EPA or State agency for review and determination.

14. **Comment:** A commenter asked the U.S. EPA to respond to information from an environmental biologist that the property from Eckles Road all the way to Newburgh Lake was contaminated.

Response: Contamination in Newburgh Lake was addressed through an investigation and restoration project performed by Wayne County beginning in 1993. A summary of the "Newburgh Lake Restoration Project" can be found on the web under www.rougeriver.com/techtop/newburgh/index.html. In summary, Wayne County undertook a project to restore Newburgh Lake to full recreational use and included dredging the lake bottom to make it deeper where sediment accumulation and nutrient rich water had led to excessive growth of aquatic plants. While implementing that project, Wayne County encountered contaminants in the lake bottom sediments, some containing toxic substances which required removal and disposal. According to reports concerning Newburgh Lake, the lake had been polluted by a variety of sources.

Part of the contamination of Newburgh Lake sediments appeared to be due to runoff from a stormwater sewer outfall, downstream of the place where the Middle Rouge River enters the lake. Stormwater runoff is water that runs over the ground during a rain or snow event. This stormwater picks up pollutants found in oil, grease, fertilizers, failing septic tanks, pesticides and other sources from industrial as well as residential properties.

Wayne County has not identified any specific street boundaries in connection with stormwater runoff that contributed to the contamination of the Newburgh Lake sediment.

15. **Comment:** A commenter requested a map or diagram of the underground body of water that flows from the GM facility and under the resident's homes.

Response: A good way to address the flow of groundwater from the facility is to show the diagrams on groundwater depth and flow. This information is presented in Figures 3.1 and 3.2 of the RFI Supplemental Report and attached to this decision document. The shallow groundwater present at the GM site flows in a southeasterly direction with the depth to groundwater occurring at about 8-12 feet below ground surface.

16. **Comment:** A commenter requested a copy of a site map that has all of the sections and sites that are referred to on the paperwork shared at the October meeting.

Response: See Response # 6.

17. **Comment:** A commenter asked why there were so many results from tests on the north side of the GM property.

Response: A number of Areas of Interest (AOIs) were identified along the north side of the GM property and were associated with plant operations. Sampling was performed at those AOIs, the same as all of the other AOIs located throughout the facility. The purpose for the sampling was to determine whether contaminants existed at the AOIs at levels that were considered unacceptable. As a result of those investigations, remedial measures were performed at several AOIs as part of interim measures activities or were included in the final corrective measures for the site.

18. **Comment:** A commenter asked whether consideration was given to test for anything other than TCE.

Response: The sampling conducted at the GM facility included analysis for a full array of constituents at all of the AOIs, including 19 metals, 48 volatile organic compounds (VOCs such as TCE) and 66 semi-volatile organic compounds (SVOCs). PCBs were also included in the analysis. A complete list of the above constituents can be found in Appendix D of the RFI Report.

19. **Comment:** A commenter asked what was stored in the concrete by the railroad tracks and was it leaking out and migrating southeast?

Response: After extensive review of the records, no specific information could be found nor knowledge acquired about the above activity. The ongoing RCRA corrective action activities at the GM facility is a U.S. EPA program that incorporates a very detailed process that is designed to investigate and guide the cleanup of any contaminated air, groundwater, surface water or soil that has resulted from past activities from regulated facilities. During the investigation, information is compiled from areas for actual or potential releases. These areas are evaluated and the extent of contamination, if present, is identified. Corrective measures are then developed and implemented to appropriately address the contaminants. Therefore, even though there is no specific knowledge of this activity, this area would have been included in the corrective action process if there was a recognized potential for release due to GM's operations..

20. **Comment:** A commenter wanted to know about the round concrete tower or building on the south side that leaked for years.

Response: After extensive review of the records, no specific information could be found nor knowledge acquired about the above activity. See Response #19 above.

21. **Comment:** A commenter wanted to know about the area at the end of their street where the railroad cars were parked with barrels.

Response: After extensive review of the records, no specific information could be found nor knowledge acquired about the above activity. See Response #19 above.

22. **Comment:** A commenter wanted to know who kept removing the manhole cover by the parked train in the field and why.

Response: After extensive review of the records, no specific information could be found nor knowledge acquired about the above activity. See Response #19 above.

23. **Comment:** A commenter wanted to know if the U.S. EPA has ever located the concrete slab that was not a building foundation that was used for chrome bumper racks and possibly where many full barrels were buried.

Response: After extensive review of the records, no specific information could be found nor knowledge acquired about the above activity. See Response #19 above.

24. **Comment:** A commenter questioned the language in the Statement of Basis (pg. 5) that only 2 of the 3 groundwater wells were inactive since many of the residents used groundwater wells until around 1990. This was also a time when contaminant levels in groundwater were presumably higher.

Response: The reference made in the Statement of Basis about the use of three residential wells was based on a timeframe when RCRA facility investigations were ongoing at the GM facility. The U.S. EPA has no knowledge of previous historical use of the wells in question. However, it needs to be noted that the above three wells are located outside of the defined groundwater plume. In addition, seven water samples collected from the two inactive residential wells, the one active well and three residential sumps located down-gradient of the site did not show any constituents above human health risk-based criteria.

25. **Comment:** A commenter asked why air quality hasn't been a topic of concern.

Response: The site has historically maintained air permits from Wayne County Air Pollution Control Division (APCD) or the State of Michigan. These permits addressed emissions from all of the air sources from the site. Air emission issues would have been dealt with by that permitting agency. No issues have been identified relating to air emissions from the site. Also, corrective action at the site

began after the Agreement was signed in October, 2001, which was after the site ceased operations and the plant structures were demolished.

- 26. Comment:** A commenter requested a copy of the CA750 report and supplemental CA750 monthly sampling.

Response: A copy of the CA750 Report is available at the Livonia Public Library for review. Additional groundwater data generated to date that is related to the CA750 monitoring program is attached to this document.

- 27. Comment:** A commenter asked why Alternative 1 would be proposed.

Response: Alternative 1 was considered as one of the options for addressing groundwater monitoring at the site on the basis that the groundwater treatment system and on-going monitoring program would be effective as a corrective measure for addressing TCE contamination. However, Alternative 2 was chosen as the most appropriate corrective measure alternative for the site.

- 28. Comment:** A commenter questioned why Alternative 1 or Alternative 2 would be selected for addressing soil at AOI 27.

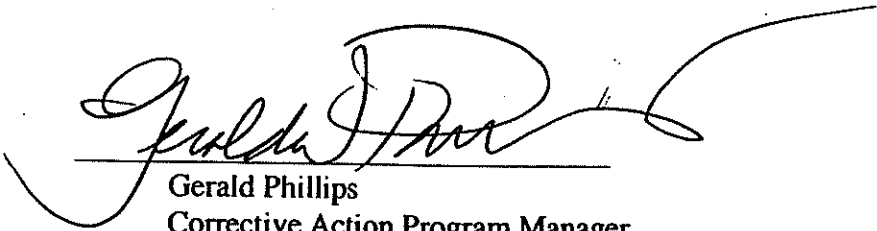
Response: Alternative 1 and 2 were considered as options for addressing soil contamination at AOI # 27 because they would not result in any current unacceptable risk to human health. However, because they may not be protective for potential future use of the land, Alternative 3 was chosen as the most appropriate alternative for the site.

Future Actions

Over a 90-day period, the U.S. EPA and General Motors will pursue negotiating an administrative order on consent (AOC) requiring General Motors to implement the selected remedy. If those negotiations fail to result in a signed AOC, the U.S. EPA may pursue other enforcement alternatives to achieve a final remedy for the site.

Declaration

Based upon the Administrative Record compiled for this corrective action at the General Motors facility in Livonia, Michigan, the U.S. EPA has determined that the selected remedy is appropriate and is protective of human health and the environment.



Gerald Phillips
Corrective Action Program Manager
Waste, Pesticides and Toxics Division
U.S. EPA Region 5

3/18/06
Date

ATTACHMENTS

**STATEMENT OF BASIS
FOR
GENERAL MOTORS CORPORATION
13000 ECKLES ROAD SITE
LIVONIA, MICHIGAN**

INTRODUCTION

This Statement of Basis (SB) for the General Motors Corporation (GMC), 13000 Eckles Road Site in Livonia, Michigan, is being issued by the United States Environmental Protection Agency (U.S. EPA) to fulfill part of its public participation responsibilities under the Resource Conservation and Recovery Act (RCRA). The SB explains the proposed remedy at GMC. This remedy is proposed for addressing soil and groundwater at the facility. In addition, the SB includes summaries of other remedies analyzed for this facility. The U.S. EPA will select a final remedy for the facility only after the public comment period has ended and the information submitted during this time has been reviewed and considered.

This document summarizes information that can be found in greater detail in the Facility Investigation Report and amended RFI report, Corrective Measures Proposal, and site assessment reports, as well as other documents contained in the administrative record for the GMC facility. U.S. EPA encourages the public to review these other documents in order to gain a more comprehensive understanding of the facility and RCRA activities that have been conducted there.

The U.S. EPA may modify the proposed remedy or select another remedy based on new information or public comments. Therefore, the public is encouraged to review and comment on all alternatives. The public can be involved in the remedy selection process by reviewing the documents contained in the administrative record. U.S. EPA will inform the public of the location and availability of the administrative record and the schedule for the public meeting.

PROPOSED REMEDY

Contaminated soils have been removed from the facility and groundwater has been and continues to be treated during ongoing corrective measures activities performed by GMC. The U.S. EPA proposes the following remedy to address the remaining contaminated soils and groundwater at the GMC facility:

Soils

AOI 5 - Remediation of benzo(a)pyrene impacted soil at AOI 5 was performed as part of an interim measure through excavation and disposal of contaminated soil at a proper landfill facility. A cleanup criteria of 8 mg/kg was met in soils at AOI 5.

AOI 27 - Soil in this area will be excavated, characterized, and transported off-site for proper disposal. Cleanup will meet human health criteria of 10^{-4} risk for cumulative cancer risk and a hazard index of 1.

AOI 31 - Remediation of PCB impacted soil at AOI 31 was performed as part of an interim measure through excavation and disposal at a licensed landfill. A cleanup criteria of 1 mg/kg was met in soils at AOI 31.

AOI 37 - Soil in this area will be excavated, characterized, and transported off-site for proper disposal. Cleanup will meet human health criteria of 10^{-4} risk for cumulative cancer risk and a hazard index of 1.

AOI 39 - A soil management plan will be developed to control particulate emissions from surface soil (i.e. dust control) at selected areas within AOI 39 to address the risk from exposure to industrial particulate soil inhalation.

Groundwater

1. Groundwater monitoring program

A long-term groundwater monitoring program will be implemented to verify that concentrations of constituents remain below human health risk-based criteria at the up-gradient property boundary, on-site, at property boundary monitoring wells, and at off-site monitoring wells down-gradient of the site. Specifically, the groundwater monitoring program will include annual or semi-annual groundwater sampling at the site's perimeter and off-site monitoring wells down-gradient of Area 1 and AOI 31 to confirm that concentrations in these areas continue to decline and the off-site migration of impacted groundwater is being controlled through the ongoing corrective measures. Additionally, monitoring wells at the interior of the site will be sampled to confirm that concentrations of constituents remain at or below levels that are protective of human health and the environment under current and reasonably expected future land use at the site. Monitoring wells located at up-gradient boundary locations will also be sampled to identify concentrations of constituents migrating onto the site in the vicinity of AOI 33.

2. French drain collection system

A French drain collection system was installed in 1980 south of Area 1 to control the off-site migration of chromium and nickel-impacted groundwater. The collected groundwater is being treated at an on-site treatment plant. The French drain collection system was expanded in 2004 with a barrier wall surrounding Area 1. The purpose of the barrier wall is to eliminate the migration of nickel-

impacted groundwater off-site. The effectiveness of the French drain collection system and Area 1 barrier wall will be monitored as part of the proposed long-term groundwater monitoring program.

3. Groundwater treatment system

Based on a field pilot test performed at AOI 31 to evaluate the effectiveness of treating TCE-impacted groundwater originating from that area, a full-scale on-site interim measures was initiated in 2005 to control the migration of TCE-impacted groundwater off-site. This treatment technology will continue as the final corrective measures for addressing TCE-impacted groundwater at AOI 31.

Institutional Controls

Institutional controls will be imposed on selected areas of the site, where contaminant concentrations in soil are above levels that allow unrestricted access, to restrict land use for industrial or commercial purposes. The use of groundwater will also be restricted to industrial or commercial purposes.

Administrative Order

During implementation of the corrective measures, an Administrative Order on Consent will be negotiated with GMC to provide an enforceable instrument for ensuring that financial assurance is and remains in place for completing corrective measures and any long-term requirements for Operations and Maintenance (O & M), including groundwater monitoring and institutional controls, are properly adhered to until the measures are completed or deemed unnecessary.

FACILITY BACKGROUND

Site Description

The site is located at 13000 Eckles Road, in the City of Livonia, Wayne County, Michigan. The site encompasses approximately 120 acres on the western edge of Livonia. The site is surrounded by industrial or commercial properties with the exception of a residential neighborhood, located southeast of the site. Coil spring and bumper manufacturing was historically conducted in the approximately 2.1 million square-foot former main building and associated support buildings at the site.

At the time of GMC's purchase in 1953, the site was used for agricultural activities. The spring and bumper building was constructed between 1953 and 1954 as the initial phase of development of the site. Additional development at the site continued until 1989. The site was used for the fabrication of coil springs, bumpers, and strut assemblies for vehicles from the site's development in 1953 to approximately July 2000.

Historically, the site contained the following buildings: a two story spring and bumper plant with substation and fan house buildings situated on the plant's roof, a single-story Marshalling Building, a three-story new industrial wastewater treatment plant (WWTP), a three-story powerhouse, a two-story incinerator building, a single-story mud house (for handling sludge), a single-story oil storage building, a single-story sampling building, and two single-story structures with basement areas. The remainder of the buildings were steel-framed structures with concrete slab-on-grade floors. Two below-grade water reservoirs were also located at the northwest end of the site.

Current Operations

All site structures, except the groundwater collection/treatment operation buildings on the southwest corner of the site, have been environmentally decommissioned and demolished. Former building concrete floor slabs remain in place, with the exception of the Marshalling Building slab that has been removed. A six-foot high security fence topped with barbed wire is located along the perimeter of the site and all gates are locked when the site is inactive.

The groundwater collection/treatment operation in the southwest corner of the site collects groundwater impacted by the historical chrome plating operations through a French drain system. Groundwater is collected and treated by pH adjustment, addition of sodium bisulfite, lime, a polymer flocculent, and a final pH adjustment. The water is treated at a maximum rate of approximately 70 gallons per minute, then batch discharged to the Detroit Water and Sewerage Department (DWSD). No other activities are currently conducted at the site.

Surface Water Hydrology

No surface water bodies exist at the site. The Rouge River and Newburgh Lake are the prominent hydrologic features in the vicinity of the site. Newburgh Lake is located approximately ¼-mile southwest of the site. In addition, Gunn Branch Creek was historically located on the adjacent property to the north of the site (beyond the Chesapeake and Ohio Railroad tracks).

The Rouge River is used for flood control and recreational purposes. The northern and central portion of Wayne County is located within the Rouge River Drainage Basin and consists of an area of approximately 187 square miles. It includes three tributaries prior to discharging into the Detroit River: Upper Rouge River, Middle Rouge River, and Lower Rouge River. The Detroit River discharges into Lake Erie, which is located approximately 40 miles southeast of the site.

Water Supply and Groundwater Use

The DWSD provides the potable water supply to the site and the local area from its Springwells Plant, located near Warren Road and Wyoming Avenue in Detroit. The

Springwells Plant is located approximately 10 miles southeast of the site. The water source for the Springwells Plant is the Detroit River.

Based on documents reviewed, one water supply well historically existed on the site. The water supply well was installed in 1954 and was located approximately 135 feet east of Eckles Road on the west side of the site. The well was used for the sprinkler system at the site. This well was 145 feet deep, however, the screened interval was unknown.

During RFI activities, three water supply wells were identified in the residential neighborhood located southeast of the site. Two of the wells were inactive and the third well was used for non-potable use (e.g., garden/lawn watering). These wells are located outside of the defined AOI 31 groundwater plume. In addition, seven water samples were collected from the two inactive residential well pipes, the one active residential non-potable well, and three residential sumps down-gradient of AOI 31 to characterize the nature of groundwater in the residential neighborhood down-gradient of AOI 31. No constituents in the residential groundwater samples were detected above human health risk-based criteria.

PRE-RCRA FACILITY INVESTIGATION

Extensive environmental investigations have been conducted at the site prior to the RCRA Facility Investigation (RFI). Historical data in addition to other existing information have been evaluated qualitatively and quantitatively to identify conditions that warrant further investigation. The qualitative review considered sample locations and depths, constituents analyzed, analytical methods, and any related field observations. The quantitative review was based on a comparison of the historical data for soil and groundwater samples with Michigan Act 451, Part 201 generic cleanup criteria that the Michigan Department of Environmental Quality (MDEQ) has developed under the authority of the Natural Resources and Environmental Protection Act.

The results of the comparisons of pre-RFI data to the Part 201 generic criteria facilitated the development of the RFI scope of work since this historical data had been collected from a majority of the AOIs identified at the site. In addition, a pre-RFI investigation conducted in 1980 provided data which prompted GMC to proactively install the groundwater extraction system (French drain) in Area 1.

RCRA FACILITY INVESTIGATION

The RFI was conducted in a phased approach, with ten phases of field investigations being implemented during the period of September 2002 through October 2004. Additionally, due to potential redevelopment, four stages of the RFI were conducted at AOI 31 on an accelerated timetable during the period of June 2002 through December 2002. One additional round of groundwater monitoring was conducted at

AOI 31 in July 2003. The data from the entire field investigations are presented in the RFI Report and Supplement to the RFI Report.

The RFI field investigation was designed to determine if a release of hazardous waste or constituents had occurred, and where a potentially significant release was identified, to characterize the nature and extent of hazardous constituents in the environmental media.

When data of sufficient quality and quantity had been collected, the data were used to support decisions regarding the need for interim or corrective measures. Human health and ecological risk assessments were conducted to provide a basis for determining whether the presence of hazardous constituents in environmental media at the site poses a significant risk to human health and the environment that would warrant corrective measures.

COMPLETED INTERIM MEASURES

Groundwater Collection/Treatment System

In 1980-81, a French drain collection system was installed along the southwest boundary of the site to collect groundwater with elevated concentrations of nickel and chromium. The elevated concentrations of these metals in groundwater resulted from the nickel and chrome plating of bumpers conducted at the site from 1954 until 1993. The system collects approximately 100,000 gallons per day of impacted groundwater. The collected groundwater is treated at an on-site treatment plant and then batch discharged to the DWSD municipal sewer system.

AOI 31 Soil

Due to potential redevelopment activities in AOI 31, the presence of polychlorinated biphenyls (PCBs) in soil in AOI 31 was characterized and delineated on an accelerated schedule from the main RFI activities. Following an approved cleanup plan, approximately 28 tons of soil with PCB concentrations ≥ 50 ppm were excavated and disposed of during August 2003 at the EQ Toxic Substances Control Act (TSCA) landfill in Wayne, Michigan and approximately 360 tons of soil with PCBs < 50 ppm were excavated and disposed of as non-hazardous soil at Waste Management's Woodland Meadows landfill in Romulus, Michigan.

An additional stage of excavation was conducted in November 2003 where approximately 300 tons of PCB contaminated soil was removed and disposed of at the appropriate landfills. A final stage of excavation was conducted in December 2003 where approximately 23 tons of low level PCBs was properly disposed of. Subsequent field screening and analytical results showed PCBs below 1ppm.

AOI 5 Soil

During the RFI, benzo(a)pyrene was detected in a shallow soil sample at a concentration higher than the Part 201 generic industrial direct contact criteria. The impacted soil was vertically and horizontally delineated and in August 2003, soil from an excavation was removed and properly disposed of off-site. In November 2003, an additional volume of soil was removed and disposed of off-site. Verification sampling showed soil was below the cleanup goal of 8 ppm.

AOI 31 Groundwater

Based on results of the RFI, trichloroethene (TCE) was detected in groundwater from AOI 31 monitoring wells at on-site and off-site locations at concentrations greater than screening criteria. Potassium permanganate (KMnO_4) was applied to the groundwater to treat the TCE in April 2004 as a pilot project. Following the application and subsequent groundwater monitoring, injection wells and monitoring wells were installed up-gradient and down-gradient of existing wells to monitor the results of the applications. Based on the success of the pilot project, a full scale on-site implementation of the treatment program was initiated in May 2005 and is presently ongoing.

Area 1 Groundwater

Based on historical and RFI results, nickel and chromium were detected in groundwater samples from Area 1. A collection trench was installed in 1980 to collect contaminated groundwater along the south boundary of the site. RFI results identified nickel in monitoring wells south of Amrhein Road at concentrations above screening criteria. A soil-bentonite and jet grout barrier wall was installed around Area 1 in fall of 2004 and appears to be controlling groundwater flow from this area of the site.

SUMMARY OF FACILITY RISKS

Human Health Risk Evaluation

During the implementation of the RFI, the sampling results from each area were compared with conservative generic and/or site specific risk-based screening criteria to identify whether a potentially significant release of hazardous constituents to the environment had occurred and to assess the adequacy of characterization of potentially significant releases. It was determined that adequate data had been collected from each AOI and the three additional areas to support a risk evaluation.

The significance of potential exposure to soil at and adjacent to the site was evaluated based on current and reasonably expected future land use. Potential receptors considered in this evaluation included on-site and off-site routine workers, on-site and off-site construction workers, site-redevelopment workers, trespassers, and off-site residents. The evaluations for all of the receptors, with the exception of the site-redevelopment workers, were conducted on an area specific basis. Due to the

uncertainty of the redevelopment plans for the site, the site-redevelopment worker evaluation was conducted on a location-by-location basis for soil and groundwater.

Of the areas evaluated, only three AOIs were identified as posing a potentially significant risk. Specifically, the cumulative site-related cancer risk and noncancer hazard index (HI) for on-site routine workers and site-redevelopment workers exposed to soil in AOI 27 and AOI 37 were estimated to be above the U.S. EPA's cumulative cancer risk limit of 10^{-4} and HI limit of 1. Poly-aromatic hydrocarbons were the primary contributor to the cancer risk estimate at AOI 27 and PCBs were the primary contributor to the HI at AOI 37. In addition, the noncancer HI for site-redevelopment workers exposed to soil in certain locations at AOI 39 was estimated to be above the U.S. EPA's HI limit of 1. The primary contributor to the noncancer hazard was manganese via inhalation of particulates.

The significance of potential exposure to groundwater at and adjacent to the site was evaluated based on current and reasonably expected future use of shallow overburden groundwater at and adjacent to the site. Potential receptors considered in the evaluation included on-site and off-site routine workers, on-site and off-site construction workers, site-redevelopment workers, and off-site residents. Based on the assessment of risks associated with potential non-potable exposures to constituents in shallow groundwater, constituent concentrations detected in groundwater at the individual investigation areas, the site perimeter wells, and off-site monitoring wells were determined to not pose any significant risk for any of the receptors, with the exception of site-redevelopment workers under certain circumstances. Specifically, the noncancer HI for site-redevelopment workers exposed to groundwater at specific locations in Area 1, Area 3, AOI 22 (which is in Area 3), and General area were estimated to be above the U.S. EPA's HI limit of 1. The primary contributors to the noncancer hazard were chromium and nickel at Area 1, Area 3, and AOI 22; and nickel at the General area via dermal contact.

Ecological Risk Evaluation

An ecological risk assessment was prepared to develop information necessary to determine whether there is the potential for unacceptable risk of adverse ecological effects resulting from site-related hazardous constituent concentrations in environmental media. The risk assessment included identification of AOIs with hazardous constituents, habitat and potentially complete exposure pathways; habitat characterization; and quantitative risk analysis.

Based on the results of a habitat characterization and a review of existing site information, there is adequate information to determine that ecological risks are negligible at the site. Currently, only the areas east of Area 2 and in the vicinity of AOI 31 were found to provide habitat for ecological receptors. No further ecological risk assessment tasks were conducted for the site because there are no releases of hazardous constituents associated with areas that currently provide-potential habitat.

In addition, these areas currently provide limited habitat and are likely to be significantly altered during the course of planned development.

SUMMARY OF CORRECTIVE MEASURES OPTIONS

Groundwater

The human health risk assessment determined that the current groundwater conditions do not pose a significant risk under current and reasonably expected future land use at and around the site with the exception of the site-redevelopment worker exposure scenario at locations in Area 1, Area 3, AOI 22, and General area. The primary contributors to the risk are chromium and nickel via dermal contact with the groundwater. Interim Measures have been implemented at Area 1 and AOI 31 to control the migration of impacted groundwater. Although concentrations of TCE in groundwater at AOI 31 do not pose a significant risk under current and reasonably expected future land use on-site or off-site, TCE was identified in groundwater samples collected from off-site monitoring wells at concentrations greater than screening criteria. The Interim Measure for AOI 31 groundwater is being implemented to control the migration of TCE-impacted groundwater.

Summary of Alternatives

The following Interim Measures are proposed as part of the final Corrective Measures for site groundwater:

1. French Drain Collection System and Area 1 Barrier Wall – The French drain collection system and Area 1 wall, discussed above under Completed Interim Measures, control the migration of chromium and nickel-impacted groundwater at Area 1.
2. Groundwater Treatment System - As discussed above under Completed Interim Measures, chemical oxidation of TCE-impacted groundwater is being conducted at AOI 31 to reduce the concentration of TCE in groundwater and, thereby, control its migration off-site.

The following two additional groundwater alternatives are considered:

Alternative 1: No Further Action – The no action alternative would require no activity as the selected Corrective Measure. This alternative would consist of completing the semi-annual sampling of select monitoring wells identified in the CA 750 Report and the supplemental CA 750 monthly sampling, both to be completed in 2005.

Alternative 2: Implementation of Annual Groundwater Monitoring Program with Contingency Plan - This alternative would require sampling of select on-site and off-site monitoring wells to confirm that constituents are not migrating off-site at

unacceptable risk based concentrations, with contingencies for additional Corrective Measures if constituent concentrations approach the risk-based criteria that are pertinent to current and reasonably expected future groundwater use immediately down-gradient of the site. During the monitoring period, evaluation of groundwater conditions will continue, and/or the need for any additional Corrective Measures.

Following completion of the CA 750 groundwater monitoring program and supplemental CA 750 groundwater monitoring in December 2005, a long-term groundwater monitoring plan will be developed based on the results of the CA 750 monitoring, identifying the monitoring wells to be sampled, the parameters to be analyzed, and the frequency and expected duration of the long-term monitoring program.

Additionally, institutional controls will be in place that will limit the use of groundwater at the site and reference a groundwater management plan for any activities that may include excavation for large construction activities conducted at locations in Area 1, Area 3, AOI 22, and General area.

Soil

AOI 5

The following Interim Measure is proposed as the final Corrective Measure for AOI 5 soil:

AOI 5 Soil Excavation - As discussed above under Completed Interim Measures, benzo(a) pyrene-impacted soil at AOI 5 was excavated and disposed at a proper landfill facility. Verification sampling showed benzo(a) pyrene was not present in soil at concentrations greater than 8 mg/kg.

AOI 27

The following three Corrective Measures alternatives are considered for AOI 27:

Alternative 1: No Further Action - The no action alternative would require no activity as the selected Corrective Measure. This alternative would result in no current unacceptable risks to human health, but would not be protective of potential site redevelopment workers or future routine workers.

Alternative 2: Engineering and Institutional Controls - A plan to install a protective barrier (pavement, concrete, etc.) and control any construction activities that require removal of the protective barrier would be implemented. The plan would include a yearly inspection to identify and repair any cracks in the protective barrier, and procedures to ensure that the proper health and safety controls are used during any subsurface construction/maintenance activities. In

addition, institutional controls will be imposed that limit the use of the land to industrial/commercial uses.

Alternative 3: Soil Excavation/Removal of Impacted Soil - Impacted soil in this area will be excavated, characterized, and transported off-site for proper disposal until estimates of cumulative cancer risk and HI would be reduced to levels that do not exceed acceptable limits of 10^{-4} and 1, respectively.

AOI 31

The following Interim Measure is proposed as a final Corrective Measure for AOI 31:

AOI 31 Soil Excavation - As discussed above under Completed Interim Measures, PCB-impacted soil at AOI 31 was excavated and disposed at a licensed landfill facility until a cleanup criteria of 1 mg/kg was achieved.

AOI 37

The following three Corrective Measures alternatives are considered for AOI 37:

Alternative 1: No Further Action - The no further action alternative would require no activity as the selected Corrective Measure. This alternative would result in no current unacceptable risks to human health, but would not be protective of potential site redevelopment workers or future routine workers.

Alternative 2: Engineering and Institutional Controls - A plan to install a protective barrier (pavement, concrete, etc.) and control any construction activities that require removal of the protective barrier, would be implemented. The plan would include a yearly inspection to identify and repair any cracks in the protective barrier, and procedures to ensure that the proper health and safety controls are used during any subsurface construction/maintenance activities. In addition, institutional controls would be imposed to restrict land use to industrial/commercial uses.

Alternative 3: Soil Excavation/Removal of Impacted Soil - Soil in this area would be excavated, characterized, and transported off-site for proper disposal until estimates of cumulative cancer risk and HI would be reduced to levels that do not exceed acceptable limits of 10^{-4} and 1, respectively.

AOI 39

The following three Corrective Measures alternatives are considered for AOI 39:

Alternative 1: No Further Action - The no action alternative would require no activity as the selected Corrective Measure. This alternative would result in no

current unacceptable risks to human health, but would not be protective of potential site redevelopment workers. Additionally, this alternative would not preclude that AOI 39 would not be subject to vehicular traffic accessing other areas of the site.

Alternative 2: Engineering and Institutional Controls - A plan would be developed and implemented at the site to control particulate emissions (i.e., dust control) during any large construction or other site activity that creates dust in areas of exposed fill for prolonged periods. In addition, institutional controls will be imposed to restrict land use to industrial/commercial uses.

Alternative 3: Soil Excavation/Removal of Impacted Soil - Soil in this area would be excavated, characterized, and transported off-site for proper disposal until estimates of cumulative cancer risk and HI would be reduced to levels that do not exceed acceptable limits of 10^{-4} and 1, respectively.

EVALUATION OF PROPOSED CORRECTIVE MEASURES

The Corrective Measures alternatives discussed above were evaluated using the General Remedy Standards and Decision Factors criteria discussed below. Based on that evaluation, the following recommended alternatives were chosen:

Groundwater

French Drain Collection and Treatment System – Interim Measure

Area 1 Barrier Wall - Interim Measure

Groundwater Treatment System at AOI 31 – Interim Measure

Implementation of Annual Groundwater Monitoring Program, including LNAPL Removal, with Contingency Plan – Alternative 2

Soils

Soil Excavation at AOI 5 – Interim Measure

Soil Excavation/Removal at AOI 27 – Alternative 3

Soil Excavation at AOI 31 – Interim Measure

Soil Excavation at AOI 37 – Alternative 3

Engineering and Institutional Controls at AOI 39 – Alternative 2

Institutional Controls

Institutional Controls (ICs) will be imposed in all site areas where risk based levels that allow for unrestricted land use are not achieved and groundwater does not meet drinking water standards. An Administrative Order on Consent will be used as the enforceable instrument to ensure the ICs and O & M requirements are met.

General Remedy Standards

Overall Protection of Human Health and the Environment - The above selected alternatives will provide adequate protection of human health and the environment. The overburden groundwater at the interior of the site, at the site perimeter, and down-gradient of the site, do not present a current unacceptable risk. Alternative 2 for the site groundwater ensures that no unacceptable exposure will occur, and the Interim Measures will mitigate off-site migration. The soil excavation/removal of impacted soil identified in alternative 3 for both AOI 27 and AOI 37 soils will ensure that acceptable levels of future potential human exposure will be attained by eliminating the soil contributing to the unacceptable risks. The potential risks will be eliminated by removing the soil with elevated concentrations of constituents. The engineering and institutional controls identified in alternative 2 for AOI 39 soils will be implemented as a means of preventing and or controlling potential exposures to identified potential risks.

Attainment of Media Cleanup Standards - The selected remedy to monitor site and down-gradient groundwater quality will ensure that the concentrations will continue to be below the appropriate risk-based groundwater criteria. Contaminants in soil have or will achieve risk based criteria based on the completed Interim Measures and Corrective Measures identified in alternative 3 for AOI 27 and AOI 37 and alternative 2 for AOI 39.

Controlling the Sources of Releases - The selected alternatives supplement the Interim Measures performed at Area 1 and AOI 31 to control the migration of impacted groundwater. Contaminants in soil at AOI 5, AOI 27, AOI 31, and AOI 37 have been or will be excavated and removed as part of Corrective Measures at the site.

Compliance with Applicable Standards for Waste Management - No wastes will be generated as part of the selected alternative, with the exception of excavated soil from AOIs 27 and 37, and minimal amounts of purge water generated during implementation of the groundwater sampling program for the site. All waste generated from the selected alternatives and any contingencies of the groundwater monitoring program will comply with applicable standards.

Remedy Decision Factors

Long Term Reliability and Effectiveness - The removal of impacted soils in AOIs 27 and 37 will result in acceptable risk that is both reliable and effective since the impacted soil will no longer be available at the site. In the event that groundwater conditions are identified above screening criteria, contingency plans will be implemented. In addition, since the site is planned for redevelopment as an industrial

and commercial business park and the uncertainties of such plans, the proposed Corrective Measures will allow for the greatest flexibility during redevelopment. The requirements for long term maintenance and implementation of engineering and institutional controls will ensure the site is protective of human health and the environment. Deed restrictions will be implemented in such a way that they continue with the land when the property, or a portion thereof, transfers ownership.

Reduction of Toxicity, Mobility, or Volume of Wastes - The results of the groundwater monitoring program will be used to verify RFI conclusions that natural processes are ongoing at the site and that in conjunction with the results of the Interim Measures in Area 1 and AOI 31, will continue to reduce the toxicity and/or mobility of the constituents of concern. The soil removal Interim Measures proposed for AOI 27 and 37 will immediately reduce the volume of impacted soil, which will be confirmed by sampling and supplemental risk assessments. The engineering and institutional controls to be implemented at AOI 39 will reduce the particulate inhalation exposures, and thus the mobility of the constituent of concern.

Short-Term Effectiveness - The surrounding community will not be affected by the remedial efforts described herein with the exception of off-site groundwater sampling. In addition, on-site workers are not at risk of exposure to the impacted soil and groundwater under the current scenario.

Implementation - The selected remedy alternatives can be implemented with minimal engineering and administrative procedures and with no impact to the surrounding community with the exception of continued off-site groundwater sampling. The field work and reporting associated with the groundwater monitoring program are routine type activities and can easily be implemented. Potential contingency measures associated with the groundwater monitoring program would also be easily implemented if necessary. Implementation of the soil excavation will depend on risk-based estimates. AOIs 27 and 37 are currently easily accessible for construction activities.

Costs - Costs associated with the groundwater monitoring program are minimal unless contingent activities are necessary. The soil excavation activities can be completed with modest costs and will provide certainty that a portion of the site can be redeveloped without concern for future workers at the site. The implementation of engineering and institutional controls at the site will also involve minimal costs.

PUBLIC PARTICIPATION

The U.S. EPA is soliciting comments from the public on corrective measures alternatives presented in this document for the GMC facility. The U.S. EPA has scheduled a public comment period of 45 days from September 2, 2005 to October 18, 2005, in order to encourage public participation in the decision process. During the public comment period, the U.S. EPA will accept written comments on the proposed action. The public

may submit written comment, questions, and request a public meeting at the following address:

Mr. Daniel Patulski
Environmental Protection Agency
77 West Jackson Boulevard, DW-8J
Chicago, Illinois 60604
Telephone No.: (312) 886-0656

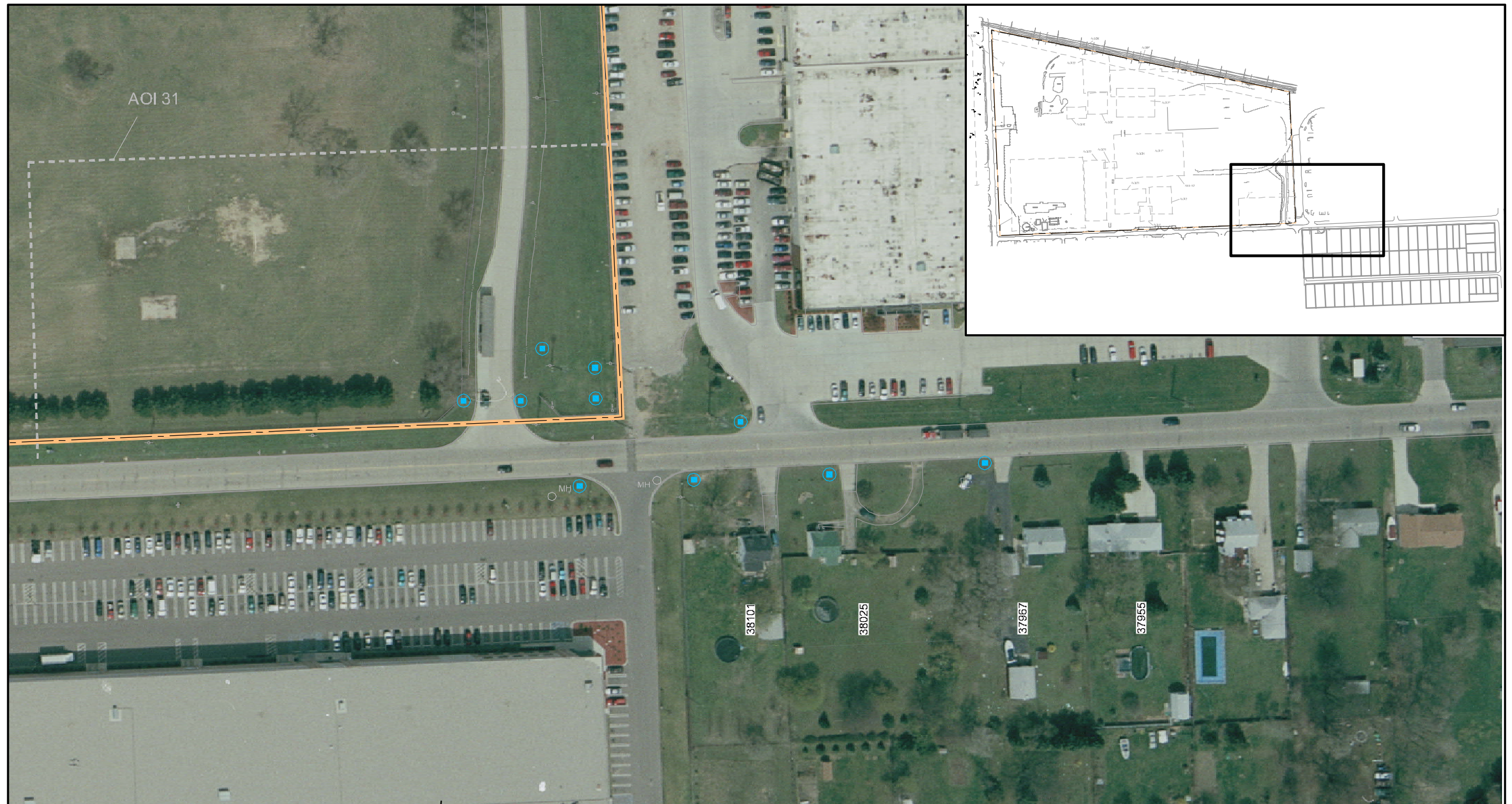
The administrative record is available for review at the following two locations:

Livonia Public Library
32777 Five Mile Road
Livonia, Michigan 48154

and

United States Environmental Protection Agency
77 West Jackson Boulevard, DW-8J
Chicago, Illinois 60604
Attention: Daniel Patulski

After U.S. EPA's consideration of the public comments that are received, they will be summarized and responses will be provided in a Response to Comments document. The Response to Comments document will be drafted after the conclusion of the public comment period and will be incorporated into the administrative record.



LEGEND

■ PROPOSED BOREHOLE

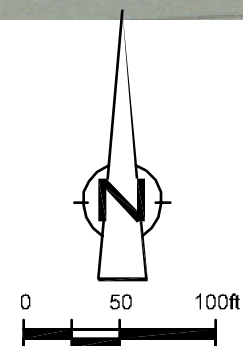


figure 1

PROPOSED SOIL BORING LOCATIONS
13000 ECKLES ROAD SITE
LIVONIA, MICHIGAN

TABLE 1

Soil Sampling Results for PCBs and TCE at the GM Livonia Site and Adjacent Residences

<u>LOCATION</u>	<u>Sampling Results (ppm¹)</u>	
	<u>PCBs</u>	<u>TCE</u>
<u>On-Site 1</u>	0.001	U ²
<u>On-Site 2</u>	U	U
<u>On-Site 3</u>	U	U
<u>On-Site 4</u>	U	U
<u>On-Site 5</u>	U	U
<u>FEDEX 6</u>	U	U
<u>McKiddy Residence</u>	U	U
<u>Admiral Tool 7</u>	U	U
<u>Hogan Residence</u>	U	U
<u>Fetter Residence</u>	U	U

1. ppm (parts per million)

2. U (Undetected)

TABLE 1
GROUNDWATER SAMPLE RESULTS
CA 750 MONITORING EVENT #2 - DECEMBER 2004
13000 ECKLES ROAD SITE
LIVONIA, MICHIGAN

Primary Area of Interest:	AOI 31	AOI 31	AOI 31	AOI 31	AOI 31	AOI 31	AOI 31	AOI 31	AOI 31
Secondary Area of Interest:	AOI 31	AOI 31	AOI 31	AOI 31	AOI 31	AOI 31	AOI 31	AOI 31	AOI 31
Sample Location:	MW-211D	MW-211S	MW-212D	MW-212S	MW-214D	MW-214S	MW-216D	MW-216S	MW-217D
Sample ID:	GW-121404-JY-015	GW-121404-JY-014	GW-121404-MM-018	GW-121404-MM-019	GW-121604-JY-025	GW-121604-JY-026	GW-121404-JY-017	GW-121404-JY-016	GW-121404-MM-023
Sample Date:	12/14/2004	12/14/2004	12/14/2004	12/14/2004	12/16/2004	12/16/2004	12/14/2004	12/14/2004	12/14/2004
Matrix:	WG	WG	WG	WG	WG	WG	WG	WG	WG
Volatile Organic Compounds	<i>Units</i>								
1,1,1-Trichloroethane	ug/L	1.0 U	8.6	1.0 U	39	1.0 U	1.0 U	1.0 U	1.0 U
1,1,2,2-Tetrachloroethane	ug/L	1.0 U	1.0 U	1.0 U	1.4 U	1.0 UJ	1.0 UJ	1.0 U	1.0 U
1,1,2-Trichloroethane	ug/L	1.0 U	1.0 U	1.0 U	1.4 U	1.0 U	1.0 U	1.0 U	1.0 U
1,1-Dichloroethane	ug/L	1.0 U	1.0 U	1.0 U	0.96 J	1.0 U	1.0 U	1.0 U	1.0 U
1,1-Dichloroethene	ug/L	1.0 U	1.0 U	1.0 U	1.2 J	1.0 U	1.0 U	1.0 U	1.0 U
1,2,4-Trichlorobenzene	ug/L	5.0 U	5.0 U	5.0 U	7.2 UJ	5.0 U	5.0 U	5.0 U	5.0 UJ
1,2-Dibromo-3-chloropropane (DBCP)	ug/L	1.0 U	1.0 U	1.0 U	1.4 U	1.0 U	1.0 U	1.0 U	1.0 U
1,2-Dibromoethane (Ethylene Dibromide)	ug/L	1.0 U	1.0 U	1.0 U	1.4 U	1.0 U	1.0 U	1.0 U	1.0 U
1,2-Dichlorobenzene	ug/L	1.0 U	1.0 U	1.0 U	1.4 U	1.0 U	1.0 U	1.0 U	1.0 U
1,2-Dichloroethane	ug/L	1.0 U	1.0 U	1.0 U	1.4 U	1.0 U	1.0 U	1.0 U	1.0 U
1,2-Dichloropropane	ug/L	1.0 U	1.0 U	1.0 U	1.4 U	1.0 U	1.0 U	1.0 U	1.0 U
1,3-Dichlorobenzene	ug/L	1.0 U	1.0 U	1.0 U	1.4 U	1.0 U	1.0 U	1.0 U	1.0 U
1,4-Dichlorobenzene	ug/L	1.0 U	1.0 U	1.0 U	1.4 U	1.0 U	1.0 U	1.0 U	1.0 U
2-Butanone (Methyl Ethyl Ketone)	ug/L	25 U	25 U	25 U	36 U	25 UJ	25 UJ	25 U	25 U
2-Hexanone	ug/L	50 U	50 U	50 U	72 U	50 UJ	50 UJ	50 U	50 U
4-Methyl-2-Pentanone (Methyl Isobutyl Ketone)	ug/L	50 U	50 U	50 U	72 U	50 UJ	50 UJ	50 U	50 U
Acetone	ug/L	25 U	25 U	25 U	36 UJ	25 UJ	25 UJ	25 U	25 UJ
Benzene	ug/L	1.0 U	1.0 U	1.0 U	1.4 U	1.0 U	1.0 U	1.0 U	1.0 U
Bromodichloromethane	ug/L	1.0 U	1.0 U	1.0 U	1.4 U	1.0 U	1.0 U	1.0 U	1.0 U
Bromoform	ug/L	1.0 U	1.0 U	1.0 U	1.4 U	1.0 U	1.0 U	1.0 U	1.0 U
Bromomethane (Methyl Bromide)	ug/L	1.0 U	1.0 U	1.0 U	1.4 U	1.0 U	1.0 U	1.0 U	1.0 U
Carbon disulfide	ug/L	5.0 U	5.0 U	5.0 U	7.2 U	5.0 U	5.0 U	5.0 U	5.0 U
Carbon tetrachloride	ug/L	1.0 U	1.0 U	1.0 U	1.4 U	1.0 U	1.0 U	1.0 U	1.0 U
Chlorobenzene	ug/L	1.0 U	1.0 U	1.0 U	1.4 U	1.0 U	1.0 U	1.0 U	1.0 U
Chloroethane	ug/L	1.0 U	1.0 U	1.0 U	1.4 U	1.0 U	1.0 U	1.0 U	1.0 U
Chloroform (Trichloromethane)	ug/L	1.0 U	1.0 U	1.0 U	0.33 J	1.0 U	1.0 U	1.0 U	1.0 U
Chloromethane (Methyl Chloride)	ug/L	1.0 U	1.0 U	1.0 U	1.4 U	1.0 U	1.0 U	1.0 U	1.0 U
cis-1,2-Dichloroethene	ug/L	1.0 U	1.0 U	1.0 U	1.4 U	1.0 U	1.0 U	1.0 U	1.0 U
cis-1,3-Dichloropropene	ug/L	1.0 U	1.0 U	1.0 U	1.4 U	1.0 U	1.0 U	1.0 U	1.0 U
Cyclohexane	ug/L	1.0 U	1.0 U	1.0 U	1.4 U	1.0 U	1.0 U	1.0 U	1.0 U
Dibromochloromethane	ug/L	1.0 U	1.0 U	1.0 U	1.4 U	1.0 U	1.0 U	1.0 U	1.0 U
Dichlorodifluoromethane (CFC-12)	ug/L	1.0 U	1.0 U	1.0 U	1.4 U	1.0 UJ	1.0 UJ	1.0 U	1.0 U
Ethylbenzene	ug/L	1.0 U	1.0 U	1.0 U	1.4 U	1.0 U	1.0 U	1.0 U	1.0 U
Isopropylbenzene	ug/L	5.0 U	5.0 U	5.0 U	7.2 U	5.0 U	5.0 U	5.0 U	5.0 U
Methyl acetate	ug/L	10 U	10 U	10 U	14 U	10 UJ	10 UJ	10 U	10 U
Methyl cyclohexane	ug/L	1.0 U	1.0 U	1.0 U	1.4 U	1.0 U	1.0 U	1.0 U	1.0 U
Methyl Tert Butyl Ether	ug/L	5.0 U	5.0 U	5.0 U	7.2 U	5.0 U	5.0 U	5.0 U	5.0 U
Methylene chloride	ug/L	5.0 U	5.0 U	5.0 U	7.2 U	5.0 U	5.0 U	5.0 U	5.0 U
Styrene	ug/L	1.0 U	1.0 U	1.0 U	1.4 U	1.0 U	1.0 U	1.0 U	1.0 U
Tetrachloroethene	ug/L	1.0 U	1.0 U	1.0 U	1.4 U	1.0 U	1.0 U	1.0 U	1.0 U
Toluene	ug/L	1.0 U	1.0 U	1.0 U	1.4 U	1.0 U	1.0 U	1.0 U	1.0 U
trans-1,2-Dichloroethene	ug/L	1.0 U	1.0 U	1.0 U	1.4 U	1.0 U	1.0 U	1.0 U	1.0 U
trans-1,3-Dichloropropene	ug/L	1.0 U	1.0 U	1.0 U	1.4 U	1.0 U	1.0 U	1.0 U	1.0 U
Trichloroethene	ug/L	1.0 U	1.0 U	1.0 U	3.5	1.0 U	1.0 U	1.0 U	1.0 U
Trichlorofluoromethane (CFC-11)	ug/L	1.0 U	1.0 U	1.0 U	1.4 U	1.0 UJ	1.0 UJ	1.0 U	1.0 U
Trifluorotrchloroethane (Freon 113)	ug/L	1.0 U	1.0 U	1.0 U	1.4 U	1.0 U	1.0 U	1.0 U	1.0 U
Vinyl chloride	ug/L	1.0 U	1.0 U	1.0 U	1.4 U	1.0 U	1.0 U	1.0 U	1.0 U
Xylene (total)	ug/L	3.0 U	3.0 U	3.0 U	4.3 U	3.0 U	3.0 U	3.0 U	3.0 U
Metals									
Chromium III (Trivalent)	mg/L	--	--	--	--	--	--	--	--
Chromium Total	mg/L	--	--	--	--	--	--	--	--
Chromium VI (Hexavalent)	mg/L	--	--	--	--	--	--	--	--
Nickel	mg/L	--	--	--	--	--	--	--	--

Notes:**U-Not present at or above the associated value****UJ-Estimated reporting limit**

TABLE 1
GROUNDWATER SAMPLE RESULTS
CA 750 MONITORING EVENT #2 - DECEMBER 2004
13000 ECKLES ROAD SITE
LIVONIA, MICHIGAN

Page 2 of 3

<i>Primary Area of Interest:</i>		AOI 31	AOI 31	AOI 31	AOI 37	Area 01	Area 01	Area 01	Area 01	Area 01
<i>Secondary Area of Interest:</i>		AOI 31	AOI 31	AOI 31	AOI 28/AOI 37	Area 01	Area 01	Area 01	Area 01	Area 01
<i>Sample Location:</i>		MW-217S	MW-217S	MW-303S	MW-28-3S	HA-MW-12	MW-OS-3D	MW-OS-4D	MW-OS-4D	MW-OS-4S
<i>Sample ID:</i>		GW-121404-MM-021	GW-121404-MM-022	GW-121404-MM-020	GW-121304-MM-010	GW-121304-MM-011	GW-121304-MM-012	GW-121304-JY-002	GW-121304-JY-003	GW-121304-JY-001
<i>Sample Date:</i>		12/14/2004	12/14/2004	12/14/2004	12/13/2004	12/13/2004	12/13/2004	12/13/2004	12/13/2004	12/13/2004
<i>Matrix:</i>		WG	WG	WG	WG	WG	WG	WG	WG	WG
	<i>Units</i>		<i>Dupl.</i>						<i>Dupl.</i>	
Volatile Organic Compounds										
1,1,1-Trichloroethane	ug/L	16	17	1.0 U	130	--	--	--	--	--
1,1,2,2-Tetrachloroethane	ug/L	1.0 U	1.0 U	1.0 U	5.6 U	--	--	--	--	--
1,1,2-Trichloroethane	ug/L	1.0 U	1.0 U	1.0 U	5.6 U	--	--	--	--	--
1,1-Dichloroethane	ug/L	0.28 J	0.26 J	1.0 U	11	--	--	--	--	--
1,1-Dichloroethene	ug/L	1.3	1.4	1.0 U	6.1	--	--	--	--	--
1,2,4-Trichlorobenzene	ug/L	5.0 U	5.0 UJ	5.0 U	28 U	--	--	--	--	--
1,2-Dibromo-3-chloropropane (DBCP)	ug/L	1.0 U	1.0 U	1.0 U	5.6 U	--	--	--	--	--
1,2-Dibromoethane (Ethylene Dibromide)	ug/L	1.0 U	1.0 U	1.0 U	5.6 U	--	--	--	--	--
1,2-Dichlorobenzene	ug/L	1.0 U	1.0 U	1.0 U	5.6 U	--	--	--	--	--
1,2-Dichloroethane	ug/L	1.0 U	1.0 U	1.0 U	5.6 U	--	--	--	--	--
1,2-Dichloropropane	ug/L	1.0 U	1.0 U	1.0 U	5.6 U	--	--	--	--	--
1,3-Dichlorobenzene	ug/L	1.0 U	1.0 U	1.0 U	5.6 U	--	--	--	--	--
1,4-Dichlorobenzene	ug/L	1.0 U	1.0 U	1.0 U	5.6 U	--	--	--	--	--
2-Butanone (Methyl Ethyl Ketone)	ug/L	25 UJ	25 U	25 UJ	140 UJ	--	--	--	--	--
2-Hexanone	ug/L	50 UJ	50 U	50 UJ	280 U	--	--	--	--	--
4-Methyl-2-Pentanone (Methyl Isobutyl Ketone)	ug/L	50 U	50 U	50 U	280 U	--	--	--	--	--
Acetone	ug/L	25 UJ	25 UJ	25 UJ	140 UJ	--	--	--	--	--
Benzene	ug/L	1.0 U	1.0 U	1.0 U	5.6 U	--	--	--	--	--
Bromodichloromethane	ug/L	1.0 U	1.0 U	1.0 U	5.6 U	--	--	--	--	--
Bromoform	ug/L	1.0 U	1.0 U	1.0 U	5.6 U	--	--	--	--	--
Bromomethane (Methyl Bromide)	ug/L	1.0 U	1.0 U	1.0 U	5.6 U	--	--	--	--	--
Carbon disulfide	ug/L	5.0 U	5.0 U	5.0 U	28 U	--	--	--	--	--
Carbon tetrachloride	ug/L	1.0 U	1.0 U	1.0 U	5.6 U	--	--	--	--	--
Chlorobenzene	ug/L	1.0 U	1.0 U	1.0 U	5.6 U	--	--	--	--	--
Chloroethane	ug/L	1.0 U	1.0 U	1.0 U	1.6 J	--	--	--	--	--
Chloroform (Trichloromethane)	ug/L	0.56 J	0.51 J	0.69 J	5.6 U	--	--	--	--	--
Chloromethane (Methyl Chloride)	ug/L	1.0 U	1.0 U	1.0 U	5.6 U	--	--	--	--	--
cis-1,2-Dichloroethene	ug/L	1.0 U	1.0 U	1.0 U	20	--	--	--	--	--
cis-1,3-Dichloropropene	ug/L	1.0 U	1.0 U	1.0 U	5.6 U	--	--	--	--	--
Cyclohexane	ug/L	1.0 U	1.0 U	1.0 U	5.6 U	--	--	--	--	--
Dibromochloromethane	ug/L	1.0 U	1.0 U	1.0 U	5.6 U	--	--	--	--	--
Dichlorodifluoromethane (CFC-12)	ug/L	1.0 U	1.0 U	1.0 U	5.6 UJ	--	--	--	--	--
Ethylbenzene	ug/L	1.0 U	1.0 U	1.0 U	5.6 U	--	--	--	--	--
Isopropylbenzene	ug/L	5.0 U	5.0 U	5.0 U	28 U	--	--	--	--	--
Methyl acetate	ug/L	10 U	10 U	10 U	56 U	--	--	--	--	--
Methyl cyclohexane	ug/L	1.0 U	1.0 U	1.0 U	5.6 U	--	--	--	--	--
Methyl Tert Butyl Ether	ug/L	5.0 U	5.0 U	5.0 U	28 U	--	--	--	--	--
Methylene chloride	ug/L	5.0 U	5.0 U	5.0 U	28 U	--	--	--	--	--
Styrene	ug/L	1.0 U	1.0 U	1.0 U	5.6 U	--	--	--	--	--
Tetrachloroethene	ug/L	1.0 U	1.0 U	1.0 U	5.6 U	--	--	--	--	--
Toluene	ug/L	1.0 U	1.0 U	1.0 U	5.6 U	--	--	--	--	--
trans-1,2-Dichloroethene	ug/L	1.0 U	1.0 U	1.0 U	1.9 J	--	--	--	--	--
trans-1,3-Dichloropropene	ug/L	1.0 U	1.0 U	1.0 U	5.6 U	--	--	--	--	--
Trichloroethene	ug/L	1.0 U	1.0 U	1.0 U	12	--	--	--	--	--
Trichlorofluoromethane (CFC-11)	ug/L	1.0 U	1.0 U	1.0 U	5.6 U	--	--	--	--	--
Trifluorotrichloroethane (Freon 113)	ug/L	1.0 U	1.0 U	1.0 U	5.6 U	--	--	--	--	--
Vinyl chloride	ug/L	1.0 U	1.0 U	1.0 U	5.6 U	--	--	--	--	--
Xylene (total)	ug/L	3.0 U	3.0 U	3.0 U	17 U	--	--	--	--	--
Metals										
Chromium III (Trivalent)	mg/L	--	--	--	--	0.020 U	0.020 U	0.020 U	0.020 U	0.020 U
Chromium Total	mg/L	--	--	--	--	0.0050 U	0.0050 U	0.0050 U	0.0050 U	0.0050 U
Chromium VI (Hexavalent)	mg/L	--	--	--	--	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U
Nickel	mg/L	--	--	--	--	0.011 J	48.6 J	29.0 J	30.1 J	0.092 J

Notes:

U-Not present at or above the associated value

UJ-Estimated reporting limit

TABLE 1
GROUNDWATER SAMPLE RESULTS
CA 750 MONITORING EVENT #2 - DECEMBER 2004
13000 ECKLES ROAD SITE
LIVONIA, MICHIGAN

Primary Area of Interest:	Area 01	Area 01	Area 01	Area 03/AOI 21	Area 03/AOI 21	Area 03/AOI 21	None	None	None
Secondary Area of Interest:	Area 01	Area 01	Area 01	Area 01/Area 03/AOI 21	Area 01/Area 03/AOI 21	Area 01/Area 03/AOI 21	NA	NA	NA
Sample Location:	MW-OS-9D	MW-OS-9S	MW-OS-10D	MW-A1-10D	MW-A1-10S	MW-A1-10S	Trip Blank	Trip Blank	Trip Blank
Sample ID:	GW-121304-JY-005	GW-121304-JY-004	GW-121304-JY-006	GW-121304-MM-009	GW-121304-MM-007	GW-121304-MM-008	TB-121304-MM-013	TB-121404-MM-024	TB-121604-JY-027
Sample Date:	12/13/2004	12/13/2004	12/13/2004	12/13/2004	12/13/2004	12/13/2004	12/13/2004	12/14/2004	12/16/2004
Matrix:	WG	WG	WG	WG	WG	WG Dupl.	WGQ fail	WGQ fail	WGQ fail
Volatile Organic Compounds	Units								
1,1,1-Trichloroethane	ug/L	--	--	--	0.34 J	47	49	1.0 U	1.0 U
1,1,2,2-Tetrachloroethane	ug/L	--	--	--	1.0 U	2.0 U	2.0 U	1.0 U	1.0 U
1,1,2-Trichloroethane	ug/L	--	--	--	1.0 U	2.0 U	2.0 U	1.0 U	1.0 U
1,1-Dichloroethane	ug/L	--	--	--	1.6	11	11	1.0 U	1.0 U
1,1-Dichloroethene	ug/L	--	--	--	0.62 J	2.9	2.4	1.0 U	1.0 U
1,2,4-Trichlorobenzene	ug/L	--	--	--	5.0 UJ	10 U	10 U	5.0 U	5.0 U
1,2-Dibromo-3-chloropropane (DBCP)	ug/L	--	--	--	1.0 UJ	2.0 U	2.0 U	1.0 U	1.0 U
1,2-Dibromoethane (Ethylene Dibromide)	ug/L	--	--	--	1.0 U	2.0 U	2.0 U	1.0 U	1.0 U
1,2-Dichlorobenzene	ug/L	--	--	--	1.0 U	2.0 U	2.0 U	1.0 U	1.0 U
1,2-Dichloroethane	ug/L	--	--	--	1.0 U	2.0 U	2.0 U	1.0 U	1.0 U
1,2-Dichloropropane	ug/L	--	--	--	1.0 U	2.0 U	2.0 U	1.0 U	1.0 U
1,3-Dichlorobenzene	ug/L	--	--	--	1.0 U	2.0 U	2.0 U	1.0 U	1.0 U
1,4-Dichlorobenzene	ug/L	--	--	--	1.0 U	2.0 U	2.0 U	1.0 U	1.0 U
2-Butanone (Methyl Ethyl Ketone)	ug/L	--	--	--	25 UJ	50 UJ	50 UJ	25 UJ	25 UJ
2-Hexanone	ug/L	--	--	--	50 UJ	100 U	100 U	50 U	50 UJ
4-Methyl-2-Pentanone (Methyl Isobutyl Ketone)	ug/L	--	--	--	50 U	100 U	100 U	50 U	50 UJ
Acetone	ug/L	--	--	--	25 UJ	50 UJ	50 UJ	25 UJ	1.3 J
Benzene	ug/L	--	--	--	1.0 U	2.0 U	2.0 U	1.0 U	1.0 U
Bromodichloromethane	ug/L	--	--	--	1.0 U	2.0 U	2.0 U	1.0 U	1.0 U
Bromoform	ug/L	--	--	--	1.0 U	2.0 U	2.0 U	1.0 U	1.0 U
Bromomethane (Methyl Bromide)	ug/L	--	--	--	1.0 U	2.0 U	2.0 U	1.0 U	1.0 U
Carbon disulfide	ug/L	--	--	--	5.0 U	10 U	10 U	5.0 U	5.0 U
Carbon tetrachloride	ug/L	--	--	--	1.0 U	2.0 U	2.0 U	1.0 U	1.0 U
Chlorobenzene	ug/L	--	--	--	1.0 U	2.0 U	2.0 U	1.0 U	1.0 U
Chloroethane	ug/L	--	--	--	1.0 U	2.0 U	2.0 U	1.0 U	1.0 U
Chloroform (Trichloromethane)	ug/L	--	--	--	1.0 U	2.0 U	2.0 U	1.0 U	1.0 U
Chloromethane (Methyl Chloride)	ug/L	--	--	--	1.0 UJ	2.0 U	2.0 U	1.0 U	0.54 J
cis-1,2-Dichloroethene	ug/L	--	--	--	1.0 U	2.0 U	2.0 U	1.0 U	1.0 U
cis-1,3-Dichloropropene	ug/L	--	--	--	1.0 U	2.0 U	2.0 U	1.0 U	1.0 U
Cyclohexane	ug/L	--	--	--	1.0 U	2.0 U	2.0 U	1.0 U	1.0 U
Dibromochloromethane	ug/L	--	--	--	1.0 U	2.0 U	2.0 U	1.0 U	1.0 U
Dichlorodifluoromethane (CFC-12)	ug/L	--	--	--	1.0 UJ	2.0 UJ	2.0 UJ	1.0 UJ	1.0 UJ
Ethylbenzene	ug/L	--	--	--	1.0 U	2.0 U	2.0 U	1.0 U	1.0 U
Isopropylbenzene	ug/L	--	--	--	5.0 U	10 U	10 U	5.0 U	5.0 U
Methyl acetate	ug/L	--	--	--	10 U	20 U	20 U	10 U	10 UJ
Methyl cyclohexane	ug/L	--	--	--	1.0 U	2.0 U	2.0 U	1.0 U	1.0 U
Methyl Tert Butyl Ether	ug/L	--	--	--	5.0 U	10 U	10 U	5.0 U	5.0 U
Methylene chloride	ug/L	--	--	--	5.0 U	10 U	10 U	0.59 J	5.0 U
Styrene	ug/L	--	--	--	1.0 U	2.0 U	2.0 U	1.0 U	1.0 U
Tetrachloroethene	ug/L	--	--	--	1.0 U	2.0 U	2.0 U	1.0 U	1.0 U
Toluene	ug/L	--	--	--	1.0 U	2.0 U	2.0 U	1.0 U	0.26 J
trans-1,2-Dichloroethene	ug/L	--	--	--	1.0 U	2.0 U	2.0 U	1.0 U	1.0 U
trans-1,3-Dichloropropene	ug/L	--	--	--	1.0 U	2.0 U	2.0 U	1.0 U	1.0 U
Trichloroethene	ug/L	--	--	--	1.0 U	2.0 U	2.0 U	1.0 U	1.0 U
Trichlorofluoromethane (CFC-11)	ug/L	--	--	--	1.0 U	2.0 U	2.0 U	1.0 U	1.0 UJ
Trifluorotrchloroethane (Freon 113)	ug/L	--	--	--	1.0 U	2.0 U	2.0 U	1.0 U	1.0 U
Vinyl chloride	ug/L	--	--	--	0.64 J	2.0 U	2.0 U	1.0 U	1.0 U
Xylene (total)	ug/L	--	--	--	3.0 U	6.0 U	6.0 U	3.0 U	3.0 U
Metals									
Chromium III (Trivalent)	mg/L	0.020 U	0.020 U	0.020 U	--	--	--	--	--
Chromium Total	mg/L	0.0050 U	0.0050 U	0.0050 U	--	--	--	--	--
Chromium VI (Hexavalent)	mg/L	0.02 U	0.02 U	0.02 U	--	--	--	--	--
Nickel	mg/L	0.025 U	0.010 J	0.025 U	--	--	--	--	--

Notes:

U-Not present at or above the associated value

UJ-Estimated reporting limit

TABLE 2
GROUNDWATER SAMPLE RESULTS - NICKEL
CA 750 MONITORING EVENT #2 - DEC 2004 AND SUPPLEMENTAL SAMPLING - MARCH 2005
13000 ECKLES ROAD SITE
LIVONIA, MICHIGAN

AOI:	Area 01	Area 01	Area 01	Area 01	Area 01	Area 01	Area 01	Area 01	Area 01
Sample Location:	HA-15	HA-16	MW-OS-2D	MW-OS-4D	MW-OS-5D	MW-OS-6D	MW-OS-7D	MW-OS-7D	MW-OS-8D
Sample ID:	GW-030905-MM-036	GW-030905-MM-034	GW-030905-DCR-035	GW-030905-DCR-033	GW-030905-MM-032	GW-030905-DCR-029	GW-030905-DCR-040	GW-030905-DCR-041	GW-030905-MM-030
Sample Date:	3/9/2005	3/9/2005	3/9/2005	3/9/2005	3/9/2005	3/9/2005	3/9/2005	3/9/2005	3/9/2005
OnSite:	On-Site	Off-Site	Off-Site	Off-Site	Off-Site	Off-Site	Off-Site	Off-Site	Off-Site
Sampling Reason:	CA 750 SUPPLEMENTAL SAMPLING	CA 750 SUPPLEMENTAL SAMPLING	CA 750 SUPPLEMENTAL SAMPLING	CA 750 SUPPLEMENTAL SAMPLING	CA 750 SUPPLEMENTAL SAMPLING	CA 750 SUPPLEMENTAL SAMPLING	CA 750 SUPPLEMENTAL SAMPLING	CA 750 SUPPLEMENTAL SAMPLING	CA 750 SUPPLEMENTAL SAMPLING
								Duplicate	
Metals (mg/L)									
Nickel	95.9	1230	0.0055 J	3.5	0.0057 J	0.024 J	0.0081 J	0.0086 J	0.0032 J

	Area 01	Area 01	Area 01	Area 01/Area 03/AOI 22
	MW-OS-8D	OW-30	OW-31	MW-22-2D
	GW-030905-MM-031	GW-030905-DCR-037	GW-030905-MM-039	GW-030905-MM-038
	3/9/2005	3/9/2005	3/9/2005	3/9/2005
	Off-Site	On-Site	On-Site	On-Site
	CA 750 SUPPLEMENTAL SAMPLING	CA 750 SUPPLEMENTAL SAMPLING	CA 750 SUPPLEMENTAL SAMPLING	CA 750 SUPPLEMENTAL SAMPLING
	Duplicate			
Metals (mg/L)				
Nickel	0.0035 J	18.1	0.034	144

Notes:

U-Not present at or above the associated value

UJ-Estimated reporting limit

TABLE 1
SUPPLEMENTAL CA 750 SAMPLING EVENT - APRIL 2005 AND SEMI-ANNUAL CA 750 SAMPLING EVENT - MAY 2005 SAMPLE RESULTS
13000 ECKLES ROAD SITE
LIVONIA, MICHIGAN

<i>AOI:</i>	<i>Area 01</i>	<i>Area 01</i>	<i>Area 01</i>	<i>Area 01</i>	<i>Area 01</i>	<i>Area 01</i>
<i>Sample Location:</i>	<i>HA-15</i>	<i>HA-16</i>	<i>HA-16</i>	<i>MW-OS-3D</i>	<i>MW-OS-4D</i>	<i>MW-OS-5D</i>
<i>Sample ID:</i>	<i>GW-041405-DCR-049</i>	<i>GW-041405-DCR-042</i>	<i>GW-041405-DCR-043</i>	<i>GW-041405-DCR-044</i>	<i>GW-041405-DCR-048</i>	<i>GW-041405-DCR-047</i>
<i>Sample Date:</i>	<i>4/14/2005</i>	<i>4/14/2005</i>	<i>4/14/2005</i>	<i>4/14/2005</i>	<i>4/14/2005</i>	<i>4/14/2005</i>
	<i>CA 750 GW Monitoring-April 05</i>	<i>CA 750 GW Monitoring-April 05</i>	<i>CA 750 GW Monitoring-April 05</i>	<i>CA 750 GW Monitoring-April 05</i>	<i>CA 750 GW Monitoring-April 05</i>	<i>CA 750 GW Monitoring-April 05</i>
			<i>Duplicate</i>			
<i>Volatiles</i>	<i>Units</i>					
1,1,1-Trichloroethane	ug/L	--	--	--	--	--
1,1,2,2-Tetrachloroethane	ug/L	--	--	--	--	--
1,1,2-Trichloroethane	ug/L	--	--	--	--	--
1,1-Dichloroethane	ug/L	--	--	--	--	--
1,1-Dichloroethene	ug/L	--	--	--	--	--
1,2,4-Trichlorobenzene	ug/L	--	--	--	--	--
1,2-Dibromo-3-chloropropane (DBCP)	ug/L	--	--	--	--	--
1,2-Dibromoethane (Ethylene Dibromide)	ug/L	--	--	--	--	--
1,2-Dichlorobenzene	ug/L	--	--	--	--	--
1,2-Dichloroethane	ug/L	--	--	--	--	--
1,2-Dichloropropane	ug/L	--	--	--	--	--
1,3-Dichlorobenzene	ug/L	--	--	--	--	--
1,4-Dichlorobenzene	ug/L	--	--	--	--	--
2-Butanone (Methyl Ethyl Ketone)	ug/L	--	--	--	--	--
2-Hexanone	ug/L	--	--	--	--	--
4-Methyl-2-Pentanone (Methyl Isobutyl Ketone)	ug/L	--	--	--	--	--
Acetone	ug/L	--	--	--	--	--
Benzene	ug/L	--	--	--	--	--
Bromodichloromethane	ug/L	--	--	--	--	--
Bromoform	ug/L	--	--	--	--	--
Bromomethane (Methyl Bromide)	ug/L	--	--	--	--	--
Carbon disulfide	ug/L	--	--	--	--	--
Carbon tetrachloride	ug/L	--	--	--	--	--
Chlorobenzene	ug/L	--	--	--	--	--
Chloroethane	ug/L	--	--	--	--	--
Chloroform (Trichloromethane)	ug/L	--	--	--	--	--
Chloromethane (Methyl Chloride)	ug/L	--	--	--	--	--
cis-1,2-Dichloroethene	ug/L	--	--	--	--	--
cis-1,3-Dichloropropene	ug/L	--	--	--	--	--
Cyclohexane	ug/L	--	--	--	--	--
Dibromochloromethane	ug/L	--	--	--	--	--
Dichlorodifluoromethane (CFC-12)	ug/L	--	--	--	--	--
Ethylbenzene	ug/L	--	--	--	--	--
Isopropylbenzene	ug/L	--	--	--	--	--
Methyl acetate	ug/L	--	--	--	--	--
Methyl cyclohexane	ug/L	--	--	--	--	--
Methyl Tert Butyl Ether	ug/L	--	--	--	--	--
Methylene chloride	ug/L	--	--	--	--	--
Styrene	ug/L	--	--	--	--	--
Tetrachloroethene	ug/L	--	--	--	--	--
Toluene	ug/L	--	--	--	--	--
trans-1,2-Dichloroethene	ug/L	--	--	--	--	--
trans-1,3-Dichloropropene	ug/L	--	--	--	--	--
Trichloroethene	ug/L	--	--	--	--	--
Trichlorofluoromethane (CFC-11)	ug/L	--	--	--	--	--
Trifluorotrichloroethane (Freon 113)	ug/L	--	--	--	--	--
Vinyl chloride	ug/L	--	--	--	--	--
Xylene (total)	ug/L	--	--	--	--	--
<i>Metals</i>						
Nickel	mg/L	46.9	1240	1160	31.0	1.5
						0.0069 J

Notes:

U - Not detected above provided detection limit

J - Numerical value is an estimated quantity

TABLE 1
SUPPLEMENTAL CA 750 SAMPLING EVENT - APRIL 2005 AND SEMI-ANNUAL CA 750 SAMPLING EVENT - MAY 2005 SAMPLE RESULTS
13000 ECKLES ROAD SITE
LIVONIA, MICHIGAN

AOI:	Area 01	Area 01	AOI 31	AOI 31	AOI 31	AOI 31
Sample Location:	MW-OS-6D	MW-OS-7D	MW-211D	MW-211S	MW-211S	MW-212D
Sample ID:	GW-041405-DCR-045	GW-041405-DCR-046	GW-051805-BF-055	GW-051805-BF-053	GW-051805-BF-054	GW-051805-BF-057
Sample Date:	4/14/2005	4/14/2005	5/18/2005	5/18/2005	5/18/2005	5/18/2005
	CA 750 GW Monitoring-April 05	CA 750 GW Monitoring-April 05	CA 750 Sampling Event - May 05	CA 750 Sampling Event - May 05	CA 750 Sampling Event - May 05	CA 750 Sampling Event - May 05
					Duplicate	
Volatiles	Units					
1,1,1-Trichloroethane	ug/L	--	1.0 U	6.6	6.4	1.0 U
1,1,2,2-Tetrachloroethane	ug/L	--	1.0 U	1.0 U	1.0 U	1.0 U
1,1,2-Trichloroethane	ug/L	--	1.0 U	1.0 U	1.0 U	1.0 U
1,1-Dichloroethane	ug/L	--	1.0 U	1.0 U	1.0 U	1.0 U
1,1-Dichloroethene	ug/L	--	1.0 U	1.0 U	1.0 U	1.0 U
1,2,4-Trichlorobenzene	ug/L	--	1.0 U	1.0 U	1.0 U	1.0 U
1,2-Dibromo-3-chloropropane (DBCP)	ug/L	--	2.0 U	2.0 U	2.0 U	2.0 U
1,2-Dibromoethane (Ethylene Dibromide)	ug/L	--	1.0 U	1.0 U	1.0 U	1.0 U
1,2-Dichlorobenzene	ug/L	--	1.0 U	1.0 U	1.0 U	1.0 U
1,2-Dichloroethane	ug/L	--	1.0 U	1.0 U	1.0 U	1.0 U
1,2-Dichloropropane	ug/L	--	1.0 U	1.0 U	1.0 U	1.0 U
1,3-Dichlorobenzene	ug/L	--	1.0 U	1.0 U	1.0 U	1.0 U
1,4-Dichlorobenzene	ug/L	--	1.0 U	1.0 U	1.0 U	1.0 U
2-Butanone (Methyl Ethyl Ketone)	ug/L	--	10 U	10 U	10 U	10 U
2-Hexanone	ug/L	--	10 U	10 U	10 U	10 U
4-Methyl-2-Pentanone (Methyl Isobutyl Ketone)	ug/L	--	10 U	10 U	10 U	10 U
Acetone	ug/L	--	10 U	10 U	10 U	10 U
Benzene	ug/L	--	1.0 U	1.0 U	1.0 U	1.0 U
Bromodichloromethane	ug/L	--	1.0 U	1.0 U	1.0 U	1.0 U
Bromoform	ug/L	--	1.0 U	1.0 U	1.0 U	1.0 U
Bromomethane (Methyl Bromide)	ug/L	--	1.0 U	1.0 U	1.0 U	1.0 U
Carbon disulfide	ug/L	--	1.0 U	1.0 U	1.0 U	1.0 U
Carbon tetrachloride	ug/L	--	1.0 U	1.0 U	1.0 U	1.0 U
Chlorobenzene	ug/L	--	1.0 U	1.0 U	1.0 U	1.0 U
Chloroethane	ug/L	--	1.0 U	1.0 U	1.0 U	1.0 U
Chloroform (Trichloromethane)	ug/L	--	1.0 U	1.0 U	1.0 U	1.0 U
Chloromethane (Methyl Chloride)	ug/L	--	1.0 U	1.0 U	1.0 U	1.0 U
cis-1,2-Dichloroethene	ug/L	--	1.0 U	1.0 U	1.0 U	1.0 U
cis-1,3-Dichloropropene	ug/L	--	1.0 U	1.0 U	1.0 U	1.0 U
Cyclohexane	ug/L	--	1.0 U	1.0 U	1.0 U	1.0 U
Dibromochloromethane	ug/L	--	1.0 U	1.0 U	1.0 U	1.0 U
Dichlorodifluoromethane (CFC-12)	ug/L	--	1.0 U	1.0 U	1.0 U	1.0 U
Ethylbenzene	ug/L	--	1.0 U	1.0 U	1.0 U	1.0 U
Isopropylbenzene	ug/L	--	1.0 U	1.0 U	1.0 U	1.0 U
Methyl acetate	ug/L	--	10 U	10 U	10 U	10 U
Methyl cyclohexane	ug/L	--	1.0 U	1.0 U	1.0 U	1.0 U
Methyl Tert Butyl Ether	ug/L	--	5.0 U	5.0 U	5.0 U	5.0 U
Methylene chloride	ug/L	--	1.0 U	1.0 U	1.0 U	1.0 U
Styrene	ug/L	--	1.0 U	1.0 U	1.0 U	1.0 U
Tetrachloroethene	ug/L	--	1.0 U	1.0 U	1.0 U	1.0 U
Toluene	ug/L	--	1.0 U	1.0 U	1.0 U	1.0 U
trans-1,2-Dichloroethene	ug/L	--	1.0 U	1.0 U	1.0 U	1.0 U
trans-1,3-Dichloropropene	ug/L	--	1.0 U	1.0 U	1.0 U	1.0 U
Trichloroethene	ug/L	--	1.0 U	1.0 U	1.0 U	1.0 U
Trichlorofluoromethane (CFC-11)	ug/L	--	1.0 U	1.0 U	1.0 U	1.0 U
Trifluorotrichloroethane (Freon 113)	ug/L	--	1.0 U	1.0 U	1.0 U	1.0 U
Vinyl chloride	ug/L	--	1.0 U	1.0 U	1.0 U	1.0 U
Xylene (total)	ug/L	--	2.0 U	2.0 U	2.0 U	2.0 U
Metals						
Nickel	mg/L	0.033	0.012 J	--	--	--

Notes:

U - Not detected above provided detection limit

J - Numerical value is an estimated quantity

TABLE 1
SUPPLEMENTAL CA 750 SAMPLING EVENT - APRIL 2005 AND SEMI-ANNUAL CA 750 SAMPLING EVENT - MAY 2005 SAMPLE RESULTS
13000 ECKLES ROAD SITE
LIVONIA, MICHIGAN

AOI:	AOI 31	AOI 31	AOI 31	AOI 31	AOI 31	AOI 31
Sample Location:	MW-212S	MW-214D	MW-214S	MW-216D	MW-216S	MW-217D
Sample ID:	GW-051805-BF-056	GW-052005-BF-063	GW-052005-BF-064	GW-051905-BF-061	GW-051905-BF-060	GW-051905-BF-059
Sample Date:	5/18/2005	5/20/2005	5/20/2005	5/19/2005	5/19/2005	5/19/2005
	CA 750 Sampling Event - May 05	CA 750 Sampling Event - May 05	CA 750 Sampling Event - May 05	CA 750 Sampling Event - May 05	CA 750 Sampling Event - May 05	CA 750 Sampling Event - May 05
Volatiles	Units					
1,1,1-Trichloroethane	ug/L	49	1.0 U	1.0 U	1.0 U	1.0 U
1,1,2,2-Tetrachloroethane	ug/L	2.5 U	1.0 U	1.0 U	1.0 U	1.0 U
1,1,2-Trichloroethane	ug/L	2.5 U	1.0 U	1.0 U	1.0 U	1.0 U
1,1-Dichloroethane	ug/L	0.65 J	1.0 U	1.0 U	1.0 U	1.0 U
1,1-Dichloroethene	ug/L	1.5 J	1.0 U	1.0 U	1.0 U	1.0 U
1,2,4-Trichlorobenzene	ug/L	2.5 U	1.0 U	0.34 JB	1.0 U	1.0 U
1,2-Dibromo-3-chloropropane (DBCP)	ug/L	5.0 U	2.0 U	2.0 U	2.0 U	2.0 U
1,2-Dibromoethane (Ethylene Dibromide)	ug/L	2.5 U	1.0 U	1.0 U	1.0 U	1.0 U
1,2-Dichlorobenzene	ug/L	2.5 U	1.0 U	1.0 U	1.0 U	1.0 U
1,2-Dichloroethane	ug/L	2.5 U	1.0 U	1.0 U	1.0 U	1.0 U
1,2-Dichloropropane	ug/L	2.5 U	1.0 U	1.0 U	1.0 U	1.0 U
1,3-Dichlorobenzene	ug/L	2.5 U	1.0 U	1.0 U	1.0 U	1.0 U
1,4-Dichlorobenzene	ug/L	2.5 U	1.0 U	1.0 U	1.0 U	1.0 U
2-Butanone (Methyl Ethyl Ketone)	ug/L	25 U	10 U	10 U	10 U	10 U
2-Hexanone	ug/L	25 U	10 U	10 U	10 U	10 U
4-Methyl-2-Pentanone (Methyl Isobutyl Ketone)	ug/L	25 U	10 U	10 U	10 U	10 U
Acetone	ug/L	25 U	10 U	10 U	10 U	10 U
Benzene	ug/L	2.5 U	1.0 U	1.0 U	1.0 U	1.0 U
Bromodichloromethane	ug/L	2.5 U	1.0 U	1.0 U	1.0 U	1.0 U
Bromoform	ug/L	2.5 U	1.0 U	1.0 U	1.0 U	1.0 U
Bromomethane (Methyl Bromide)	ug/L	2.5 U	1.0 U	1.0 U	1.0 U	1.0 U
Carbon disulfide	ug/L	2.5 U	1.0 U	1.0 U	1.0 U	1.0 U
Carbon tetrachloride	ug/L	2.5 U	1.0 U	1.0 U	1.0 U	1.0 U
Chlorobenzene	ug/L	2.5 U	1.0 U	1.0 U	1.0 U	1.0 U
Chloroethane	ug/L	2.5 U	1.0 U	1.0 U	1.0 U	1.0 U
Chloroform (Trichloromethane)	ug/L	2.5 U	1.0 U	1.0 U	0.19 J	1.0 U
Chloromethane (Methyl Chloride)	ug/L	2.5 U	1.0 U	1.0 U	1.0 U	1.0 U
cis-1,2-Dichloroethene	ug/L	2.5 U	1.0 U	1.0 U	1.0 U	1.0 U
cis-1,3-Dichloropropene	ug/L	2.5 U	1.0 U	1.0 U	1.0 U	1.0 U
Cyclohexane	ug/L	2.5 U	1.0 U	1.0 U	1.0 U	1.0 U
Dibromochloromethane	ug/L	2.5 U	1.0 U	1.0 U	1.0 U	1.0 U
Dichlorodifluoromethane (CFC-12)	ug/L	2.5 U	1.0 U	1.0 U	1.0 U	1.0 U
Ethylbenzene	ug/L	2.5 U	1.0 U	1.0 U	1.0 U	1.0 U
Isopropylbenzene	ug/L	2.5 U	1.0 U	1.0 U	1.0 U	1.0 U
Methyl acetate	ug/L	25 U	10 U	10 U	10 U	10 U
Methyl cyclohexane	ug/L	2.5 U	1.0 U	1.0 U	1.0 U	1.0 U
Methyl Tert Butyl Ether	ug/L	12 U	5.0 U	5.0 U	5.0 U	5.0 U
Methylene chloride	ug/L	2.5 U	1.0 U	1.0 U	1.0 U	1.0 U
Styrene	ug/L	2.5 U	1.0 U	1.0 U	1.0 U	1.0 U
Tetrachloroethene	ug/L	2.5 U	1.0 U	1.0 U	1.0 U	1.0 U
Toluene	ug/L	2.5 U	1.0 U	1.0 U	1.0 U	1.0 U
trans-1,2-Dichloroethene	ug/L	2.5 U	1.0 U	1.0 U	1.0 U	1.0 U
trans-1,3-Dichloropropene	ug/L	2.5 U	1.0 U	1.0 U	1.0 U	1.0 U
Trichloroethene	ug/L	11	1.0 U	1.0 U	1.0 U	1.0 U
Trichlorofluoromethane (CFC-11)	ug/L	2.5 U	1.0 U	1.0 U	1.0 U	1.0 U
Trifluorotrichloroethane (Freon 113)	ug/L	2.5 U	1.0 U	1.0 U	1.0 U	1.0 U
Vinyl chloride	ug/L	2.5 U	1.0 U	1.0 U	1.0 U	1.0 U
Xylene (total)	ug/L	5.0 U	2.0 U	2.0 U	2.0 U	2.0 U
Metals						
Nickel	mg/L	--	--	--	--	--

Notes:

U - Not detected above provided detection limit

J - Numerical value is an estimated quantity

TABLE 1
SUPPLEMENTAL CA 750 SAMPLING EVENT - APRIL 2005 AND SEMI-ANNUAL CA 750 SAMPLING EVENT - MAY 2005 SAMPLE RESULTS
13000 ECKLES ROAD SITE
LIVONIA, MICHIGAN

AOI:	AOI 31		AOI 31		AOI 28/AOI 37		Area 01/Area 03/AOI 21		Area 01/Area 03/AOI 21	
Sample Location:	MW-217S		MW-303S		MW-28-3S		MW-A1-10D		MW-A1-10S	
Sample ID:	GW-051905-BF-058		GW-052005-BF-065		GW-051805-BF-052		GW-051805-BF-051		GW-051805-BF-050	
Sample Date:	5/19/2005		5/20/2005		5/18/2005		5/18/2005		5/18/2005	
	CA 750 Sampling Event - May 05		CA 750 Sampling Event - May 05		CA 750 Sampling Event - May 05		CA 750 Sampling Event - May 05		CA 750 Sampling Event - May 05	
Volatiles	Units									
1,1,1-Trichloroethane	ug/L	22		1.0 U		34		1.1		45
1,1,2,2-Tetrachloroethane	ug/L	1.0 U		1.0 U		1.7 U		1.0 U		2.0 U
1,1,2-Trichloroethane	ug/L	1.0 U		1.0 U		1.7 U		1.0 U		2.0 U
1,1-Dichloroethane	ug/L	0.97 J		1.0 U		4.4		1.8		16
1,1-Dichloroethene	ug/L	3.7		1.0 U		0.84 J		0.59 J		1.0 J
1,2,4-Trichlorobenzene	ug/L	1.0 U		1.0 U		1.7 U		1.0 U		2.0 U
1,2-Dibromo-3-chloropropane (DBCP)	ug/L	2.0 U		2.0 U		3.3 U		2.0 U		4.0 U
1,2-Dibromoethane (Ethylene Dibromide)	ug/L	1.0 U		1.0 U		1.7 U		1.0 U		2.0 U
1,2-Dichlorobenzene	ug/L	1.0 U		1.0 U		1.7 U		1.0 U		2.0 U
1,2-Dichloroethane	ug/L	1.0 U		1.0 U		1.7 U		1.0 U		2.0 U
1,2-Dichloropropane	ug/L	1.0 U		1.0 U		1.7 U		1.0 U		2.0 U
1,3-Dichlorobenzene	ug/L	1.0 U		1.0 U		1.7 U		1.0 U		2.0 U
1,4-Dichlorobenzene	ug/L	1.0 U		1.0 U		1.7 U		1.0 U		2.0 U
2-Butanone (Methyl Ethyl Ketone)	ug/L	10 U		10 U		17 U		10 U		20 U
2-Hexanone	ug/L	10 U		10 U		17 U		10 U		20 U
4-Methyl-2-Pentanone (Methyl Isobutyl Ketone)	ug/L	10 U		10 U		17 U		10 U		20 U
Acetone	ug/L	10 U		10 U		17 U		10 U		20 U
Benzene	ug/L	1.0 U		1.0 U		1.7 U		1.0 U		2.0 U
Bromodichloromethane	ug/L	1.0 U		1.0 U		1.7 U		1.0 U		2.0 U
Bromoform	ug/L	1.0 U		1.0 U		1.7 U		1.0 U		2.0 U
Bromomethane (Methyl Bromide)	ug/L	1.0 U		1.0 U		1.7 U		1.0 U		2.0 U
Carbon disulfide	ug/L	1.0 U		1.0 U		1.7 U		1.0 U		2.0 U
Carbon tetrachloride	ug/L	1.0 U		1.0 U		1.7 U		1.0 U		2.0 U
Chlorobenzene	ug/L	1.0 U		1.0 U		1.7 U		1.0 U		2.0 U
Chloroethane	ug/L	1.0 U		1.0 U		1.8		1.0 U		2.0 U
Chloroform (Trichloromethane)	ug/L	0.63 J		0.42 J		1.7 U		1.0 U		2.0 U
Chloromethane (Methyl Chloride)	ug/L	1.0 U		1.0 U		1.7 U		1.0 U		2.0 U
cis-1,2-Dichloroethene	ug/L	0.27 J		1.0 U		6.5		1.0 U		2.0 U
cis-1,3-Dichloropropene	ug/L	1.0 U		1.0 U		1.7 U		1.0 U		2.0 U
Cyclohexane	ug/L	1.0 U		1.0 U		1.7 U		1.0 U		2.0 U
Dibromochloromethane	ug/L	1.0 U		1.0 U		1.7 U		1.0 U		2.0 U
Dichlorodifluoromethane (CFC-12)	ug/L	1.0 U		1.0 U		1.7 U		1.0 U		2.0 U
Ethylbenzene	ug/L	1.0 U		1.0 U		1.7 U		1.0 U		2.0 U
Isopropylbenzene	ug/L	1.0 U		1.0 U		1.7 U		1.0 U		2.0 U
Methyl acetate	ug/L	10 U		10 U		17 U		10 U		20 U
Methyl cyclohexane	ug/L	1.0 U		1.0 U		1.7 U		1.0 U		2.0 U
Methyl Tert Butyl Ether	ug/L	5.0 U		5.0 U		8.4 U		5.0 U		10 U
Methylene chloride	ug/L	1.0 U		1.0 U		1.7 U		1.0 U		2.0 U
Styrene	ug/L	1.0 U		1.0 U		1.7 U		1.0 U		2.0 U
Tetrachloroethene	ug/L	1.0 U		1.0 U		1.7 U		1.0 U		2.0 U
Toluene	ug/L	1.0 U		1.0 U		1.7 U		1.0 U		2.0 U
trans-1,2-Dichloroethene	ug/L	1.0 U		1.0 U		0.70 J		1.0 U		2.0 U
trans-1,3-Dichloropropene	ug/L	1.0 U		1.0 U		1.7 U		1.0 U		2.0 U
Trichloroethene	ug/L	1.0 U		1.0 U		4.7		1.0 U		2.0 U
Trichlorofluoromethane (CFC-11)	ug/L	1.0 U		1.0 U		1.7 U		1.0 U		2.0 U
Trifluorotrichloroethane (Freon 113)	ug/L	1.0 U		1.0 U		1.7 U		1.0 U		2.0 U
Vinyl chloride	ug/L	1.0 U		1.0 U		1.7 U		0.94 J		2.0 U
Xylene (total)	ug/L	2.0 U		2.0 U		3.3 U		2.0 U		4.0 U
Metals										
Nickel	mg/L	--		--		--		--		--

Notes:

U - Not detected above provided detection limit

J - Numerical value is an estimated quantity

TABLE 1
SUPPLEMENTAL CA 750 GROUNDWATER SAMPLE ANALYTICAL RESULTS
13000 ECKLES ROAD SITE
LIVONIA, MICHIGAN

<i>Area of Interest:</i>			<i>Area 01</i>	<i>Area 01</i>	<i>Area 01</i>	<i>Area 01</i>	<i>General</i>
<i>Sample Location:</i>		<i>Construction Worker</i>	<i>HA-14</i>	<i>HA-14</i>	<i>HA-15</i>	<i>MW-27</i>	<i>MW-S-8D</i>
<i>Sample ID:</i>		<i>Groundwater</i>	<i>GW-081205-DCR-059</i>	<i>GW-081205-DCR-060</i>	<i>GW-081205-DCR-061</i>	<i>GW-081205-DCR-058</i>	<i>GW-081205-DCR-062</i>
<i>Sample Date:</i>		<i>Contact Criteria</i>	<i>8/12/2005</i>	<i>8/12/2005</i>	<i>8/12/2005</i>	<i>8/12/2005</i>	<i>8/12/2005</i>
<i>Matrix:</i>			<i>WG</i>	<i>WG</i>	<i>WG</i>	<i>WG</i>	<i>WG</i>
				<i>Duplicate</i>			
<i>Metals</i>	<i>Units</i>						
Nickel	mg/L	2,400	130	134	69.5	29.6	20.1

TABLE 1

January 13, 2006

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**SUPPLEMENTAL CA 750 GROUNDWATER SAMPLE ANALYTICAL RESULTS
13000 ECKLES ROAD SITE
LIVONIA, MICHIGAN**

<i>Area of Interest:</i>		<i>Area 01</i>	<i>Area 01</i>	<i>Area 01</i>	<i>Area 01</i>	<i>Area 01</i>	<i>Area 01</i>	
<i>Sample Location:</i>	<i>Construction Worker</i>	<i>HA-14</i>	<i>HA-14</i>	<i>HA-14</i>	<i>HA-14</i>	<i>HA-15</i>	<i>HA-15</i>	
<i>Sample ID:</i>	<i>Groundwater</i>	<i>GW-092505-DCR-100</i>	<i>GW-102205-DCR-122</i>	<i>GW-112705-DCR-126</i>	<i>GW-112705-DCR-127</i>	<i>GW-092505-DCR-102</i>	<i>GW-102205-DCR-124</i>	
<i>Sample Date:</i>	<i>Contact Criteria</i>	<i>9/25/2005</i>	<i>10/22/2005</i>	<i>11/27/2005</i>	<i>11/27/2005</i>	<i>9/25/2005</i>	<i>10/22/2005</i>	
<i>Sample Matrix:</i>		<i>WG</i>	<i>WG</i>	<i>WG</i>	<i>WG</i>	<i>WG</i>	<i>WG</i>	
					<i>Duplicate</i>			
<i>Metals</i>	<i>Units</i>							
Nickel	mg/L	2,400	146 J	127	104	107	68.1 J	22.9

TABLE 1

January 13, 2006

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**SUPPLEMENTAL CA 750 GROUNDWATER SAMPLE ANALYTICAL RESULTS
13000 ECKLES ROAD SITE
LIVONIA, MICHIGAN**

<i>Area of Interest:</i>		<i>Area 01</i>	<i>Area 01</i>	<i>Area 01</i>	<i>Area 01</i>	<i>Area 01</i>	<i>Area 01</i>	<i>Area 01</i>
<i>Sample Location:</i>		<i>HA-15</i>	<i>MW-27</i>	<i>MW-27</i>	<i>MW-27</i>	<i>MW-S-8D</i>	<i>MW-S-8D</i>	<i>MW-S-8D</i>
<i>Sample ID:</i>		<i>GW-112705-DCR-129</i>	<i>GW-092505-DCR-101</i>	<i>GW-102205-DCR-123</i>	<i>GW-112705-DCR-128</i>	<i>GW-092505-DCR-103</i>	<i>GW-102205-DCR-125</i>	<i>GW-112705-DCR-130</i>
<i>Sample Date:</i>		<i>11/27/2005</i>	<i>9/25/2005</i>	<i>10/22/2005</i>	<i>11/27/2005</i>	<i>9/25/2005</i>	<i>10/22/2005</i>	<i>11/27/2005</i>
<i>Sample Matrix:</i>		<i>WG</i>	<i>WG</i>	<i>WG</i>	<i>WG</i>	<i>WG</i>	<i>WG</i>	<i>WG</i>
<i>Metals</i>	<i>Units</i>							
Nickel	mg/L	58.3	21.6 J	14.9	9.4	1.4 J	79.8	19.0

TABLE 2

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AOI 31 INTERIM MEASURE GROUNDWATER SAMPLE RESULTS
13000 ECKLES ROAD SITE
LIVONIA, MICHIGAN

<i>Area of Interest:</i>		<i>AOI 31</i>	<i>AOI 31</i>	<i>AOI 31</i>	<i>AOI 31</i>	<i>AOI 31</i>	<i>AOI 31</i>	<i>AOI 31</i>	<i>AOI 31</i>
<i>Sample Location:</i>		<i>MW1-01</i>	<i>MW3D-02</i>	<i>MW3S-02</i>	<i>MW5S-02</i>	<i>MW-101</i>	<i>MW-102</i>	<i>MW-103D</i>	<i>MW-103S</i>
<i>Sample ID:</i>		<i>GW-12607-102005-JY-106</i>	<i>GW-12607-102005-JY-108</i>	<i>GW-12607-102005-JY-107</i>	<i>GW-12607-102005-JY-105</i>	<i>GW-12607-102005-JY-110</i>	<i>GW-12607-102105-JY-117</i>	<i>GW-12607-102105-JY-116</i>	<i>GW-12607-102105-JY-115</i>
<i>Sample Date:</i>		<i>10/20/2005</i>	<i>10/20/2005</i>	<i>10/20/2005</i>	<i>10/20/2005</i>	<i>10/20/2005</i>	<i>10/21/2005</i>	<i>10/21/2005</i>	<i>10/21/2005</i>
<i>On-site:</i>		<i>On-Site</i>	<i>On-Site</i>	<i>On-Site</i>	<i>On-Site</i>	<i>On-Site</i>	<i>On-Site</i>	<i>On-Site</i>	<i>On-Site</i>
<i>Sampling Event:</i>		<i>AOI 31 GW Interim Measure</i>	<i>AOI 31 GW Interim Measure</i>	<i>AOI 31 GW Interim Measure</i>	<i>AOI 31 GW Interim Measure</i>	<i>AOI 31 GW Interim Measure</i>	<i>AOI 31 GW Interim Measure</i>	<i>AOI 31 GW Interim Measure</i>	<i>AOI 31 GW Interim Measure</i>
<i>Volatile Organic Compounds</i>									
	<i>Units</i>								
1,1,1-Trichloroethane	ug/L	1.1	1.0 U	25	1.7	20	22	1.0 U	57
1,1,2,2-Tetrachloroethane	ug/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.4 U	1.0 UJ	2.0 U
1,1,2-Trichloroethane	ug/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.4 U	1.0 UJ	2.0 U
1,1-Dichloroethane	ug/L	1.0 U	1.0 U	3.9	1.0 U	0.30 J	1.4 U	1.0 UJ	2.0 U
1,1-Dichloroethene	ug/L	1.0 U	1.0 U	0.40 J	1.0 U	0.19 J	1.1 J	1.0 U	2.5
1,2,4-Trichlorobenzene	ug/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.4 U	1.0 U	2.0 U
1,2-Dibromo-3-chloropropane (DBCP)	ug/L	2.0 U	2.0 U	2.0 U	2.0 U	2.0 U	2.9 U	2.0 U	4.0 U
1,2-Dibromoethane (Ethylene Dibromide)	ug/L	1.0 UJ	1.0 UJ	1.0 UJ	1.0 UJ	1.0 UJ	1.4 U	1.0 U	2.0 U
1,2-Dichlorobenzene	ug/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.4 U	1.0 U	2.0 U
1,2-Dichloroethane	ug/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.4 U	1.0 U	2.0 U
1,2-Dichloropropane	ug/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.4 U	1.0 UJ	2.0 U
1,3-Dichlorobenzene	ug/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.4 U	1.0 U	2.0 U
1,4-Dichlorobenzene	ug/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.4 U	1.0 U	2.0 U
2-Butanone (Methyl Ethyl Ketone)	ug/L	10 U	10 U	2.4 J	10 U	11	14 U	10 UJ	20 U
2-Hexanone	ug/L	10 U	10 U	1.2 J	10 U	1.0 J	14 U	10 UJ	20 U
4-Methyl-2-Pentanone (Methyl Isobutyl Ketone)	ug/L	10 U	10 U	0.90 J	10 U	1.1 J	14 U	10 UJ	20 U
Acetone	ug/L	10 UJ	10 UJ	10 UJ	10 UJ	46 J	14 U	10 U	20 U
Benzene	ug/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.4 U	1.0 UJ	2.0 U
Bromodichloromethane	ug/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.4 U	1.0 U	2.0 U
Bromoform	ug/L	1.0 UJ	1.0 UJ	1.0 UJ	1.0 UJ	1.0 UJ	1.4 U	1.0 U	2.0 U
Bromomethane (Methyl Bromide)	ug/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	7.9	1.0 U	2.0 U
Carbon disulfide	ug/L	1.0 U	1.0 U	1.7	1.0 U	1.0 U	1.4 U	1.0 U	2.0 U
Carbon tetrachloride	ug/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.4 U	1.0 U	2.0 U
Chlorobenzene	ug/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.4 U	1.0 U	2.0 U
Chloroethane	ug/L	1.0 U	1.0 U	0.69 J	1.0 U	1.0 U	7.6	1.0 U	2.0 U
Chloroform (Trichloromethane)	ug/L	1.0 U	1.0 U	0.50 J	1.0 U	0.18 J	1.4 U	1.0 U	2.0 U
Chloromethane (Methyl Chloride)	ug/L	1.0 UJ	1.0 UJ	1.0 UJ	1.0 UJ	1.0 UJ	8.4	1.0 U	2.0 U
cis-1,2-Dichloroethene	ug/L	1.0 U	1.0 U	8.8	1.0 U	0.38 J	0.46 J	1.0 UJ	0.78 J
cis-1,3-Dichloropropene	ug/L	1.0 UJ	1.0 UJ	1.0 UJ	1.0 UJ	1.0 UJ	1.4 U	1.0 UJ	2.0 U
Cyclohexane	ug/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.4 U	1.0 UJ	2.0 U
Dibromochloromethane	ug/L	1.0 UJ	1.0 UJ	1.0 UJ	1.0 UJ	1.0 UJ	1.4 U	1.0 U	2.0 U
Dichlorodifluoromethane (CFC-12)	ug/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	3.0 J	1.0 UJ	2.0 U
Ethylbenzene	ug/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.4 U	1.0 UJ	2.0 U
Isopropylbenzene	ug/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.4 U	1.0 U	2.0 U
Methyl acetate	ug/L	10 U	10 U	10 U	10 U	10 U	14 U	10 UJ	20 U
Methyl cyclohexane	ug/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.4 U	1.0 UJ	2.0 U
Methyl Tert Butyl Ether	ug/L	5.0 U	5.0 U	5.0 U	5.0 U	5.0 U	7.2 U	5.0 U	10 U
Methylene chloride	ug/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.4 U	1.0 UJ	2.0 U
Styrene	ug/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.4 U	1.0 UJ	2.0 U
Tetrachloroethene	ug/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.4 U	1.0 U	2.0 U
Toluene	ug/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.4 U	1.0 U	2.0 U
trans-1,2-Dichloroethene	ug/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.4 U	1.0 UJ	2.0 U
trans-1,3-Dichloropropene	ug/L	1.0 UJ	1.0 UJ	1.0 UJ	1.0 UJ	1.0 UJ	1.4 U	1.0 U	2.0 U
Trichloroethene	ug/L	1.0 U	1.0 U	25	3.7	30	49	1.0 U	65
Trichlorofluoromethane (CFC-11)	ug/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	3.8	1.0 U	2.0 U
Trifluorotrichloroethane (Freon 113)	ug/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.4 U	1.0 U	2.0 U
Vinyl chloride	ug/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	7.1	1.0 U	2.0 U
Xylene (total)	ug/L	2.0 U	2.0 U	2.0 U	2.0 U	2.0 U	2.9 U	2.0 UJ	4.0 U
<i>Metals</i>									
Manganese	mg/L	0.038	0.33	0.20	0.015 U	1.2	0.82	0.11	0.0047 J
Manganese (Dissolved)	mg/L	0.041	0.32	0.18	0.0044 J	0.41	0.66	0.095	0.011 J
Potassium	mg/L	3.7 J	2.4 J	294	4.0 J	286	18.3	1.2 J	4.3 J
Potassium (Dissolved)	mg/L	3.7 J	2.3 J	305	3.8 J	273	17.3	1.1 J	4.2 J
<i>Biological</i>									
Aerobic TCE Specific Microbial Population	CFU/mL	140	60	1100	780	3200	190	130	910
Aerobic Total Microbial Population	CFU/mL	55	210	40000	110	31000	910	20	9500
Anaerobic TCE Specific Microbial Population	CFU/mL	110	750	10000	260	3100	140	130	2100
Anaerobic Total Microbial Population	CFU/mL	150	460	12000	280	12000	660	5200	6600
<i>General Chemistry</i>									
Chloride	mg/L	5.3	381	4.8	11.3	7.8	14.2	164	31.1
Conductivity	nS/cm	0.659	2.45	1.115	0.885	1.277	0.895	0.875	0.982
Dissolved Oxygen	mg/L	2.08	0.22	0.08	2.15	0.16	0.24	0.45	0.24
Oxidation reduction potential	milliVolts	-6	-188	97	484	592	421	-222	411
pH Field	s.u.	7.13	7.16	7.44	7.02	7.72	7.03	7.45	7.02
Temperature	Deg C	13.8	14.9	17	13	15.8	12.8	10.8	11.3
Total Dissolved Solids (TDS)	mg/L	400	1200	780	520	850	540	620 J	590
Total Suspended Solids (TSS)	mg/L	5.0	6.0	4.0	5.0	9.0	4.0 U	6.0	4.0 U
Turbidity	NTU	1.99	1.13	0.7	1.19	11.9	2.04	3.82	1.0 <

TABLE 2

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AOI 31 INTERIM MEASURE GROUNDWATER SAMPLE RESULTS
13000 ECKLES ROAD SITE
LIVONIA, MICHIGAN

<i>Area of Interest:</i>		<i>AOI 31</i>	<i>AOI 31</i>	<i>AOI 31</i>	<i>AOI 31</i>	<i>AOI 31</i>	<i>AOI 31</i>	<i>AOI 31</i>	<i>AOI 31</i>
<i>Sample Location:</i>		<i>MW-104D</i>	<i>MW-104S</i>	<i>MW-105D</i>	<i>MW-105D</i>	<i>MW-105S</i>	<i>MW-202D</i>	<i>MW-202S</i>	<i>MW4S-02</i>
<i>Sample ID:</i>		<i>GW-12607-102105-JY-118</i>	<i>GW-12607-102105-JY-119</i>	<i>GW-12607-102005-JY-111</i>	<i>GW-12607-102005-JY-112</i>	<i>GW-12607-102005-JY-113</i>	<i>GW-12607-102105-JY-120</i>	<i>GW-12607-102105-JY-121</i>	<i>GW-12607-102005-JY-109</i>
<i>Sample Date:</i>		<i>10/21/2005</i>	<i>10/21/2005</i>	<i>10/20/2005</i>	<i>10/20/2005</i>	<i>10/20/2005</i>	<i>10/21/2005</i>	<i>10/21/2005</i>	<i>10/20/2005</i>
<i>Onsite:</i>		<i>On-Site</i>	<i>On-Site</i>	<i>On-Site</i>	<i>On-Site</i>	<i>On-Site</i>	<i>Off-Site</i>	<i>Off-Site</i>	<i>On-Site</i>
<i>Sampling Event:</i>		<i>AOI 31 GW Interim Measure</i>	<i>AOI 31 GW Interim Measure</i>	<i>AOI 31 GW Interim Measure</i>	<i>AOI 31 GW Interim Measure</i>	<i>AOI 31 GW Interim Measure</i>	<i>AOI 31 GW Interim Measure</i>	<i>AOI 31 GW Interim Measure</i>	<i>AOI 31 GW Interim Measure</i>
<i>Volatile Organic Compounds</i>					<i>Duplicate</i>				
1,1,1-Trichloroethane	ug/L	1.0 U	8.3	1.0 U	1.0 U	15	1.0 U	41	48
1,1,2,2-Tetrachloroethane	ug/L	1.0 U	2.0 U	1.0 U	1.0 U	1.0 U	1.0 U	3.3 U	1.0 U
1,1,2-Trichloroethane	ug/L	1.0 U	2.0 U	1.0 U	1.0 U	1.0 U	1.0 U	3.3 U	1.0 U
1,1-Dichloroethane	ug/L	1.0 U	2.0 U	1.0 U	1.0 U	1.0 U	1.0 U	3.3 U	0.80 J
1,1-Dichloroethene	ug/L	1.0 U	2.0 U	1.0 U	1.0 U	0.21 J	1.0 U	2.2 J	0.77 J
1,2,4-Trichlorobenzene	ug/L	1.0 U	2.0 U	1.0 U	1.0 U	1.0 U	1.0 U	3.3 U	1.0 U
1,2-Dibromo-3-chloropropane (DBCP)	ug/L	2.0 U	4.0 U	2.0 U	2.0 U	2.0 U	2.0 U	6.7 U	2.0 U
1,2-Dibromoethane (Ethylene Dibromide)	ug/L	1.0 U	2.0 U	1.0 UJ	1.0 UJ	1.0 UJ	1.0 U	3.3 U	1.0 UJ
1,2-Dichlorobenzene	ug/L	1.0 U	2.0 U	1.0 U	1.0 U	1.0 U	1.0 U	3.3 U	1.0 U
1,2-Dichloroethane	ug/L	1.0 U	2.0 U	1.0 U	1.0 U	1.0 U	1.0 U	3.3 U	1.0 U
1,2-Dichloropropane	ug/L	1.0 U	2.0 U	1.0 U	1.0 U	1.0 U	1.0 U	3.3 U	1.0 U
1,3-Dichlorobenzene	ug/L	1.0 U	2.0 U	1.0 U	1.0 U	1.0 U	1.0 U	3.3 U	1.0 U
1,4-Dichlorobenzene	ug/L	1.0 U	2.0 U	1.0 U	1.0 U	1.0 U	1.0 U	3.3 U	1.0 U
2-Butanone (Methyl Ethyl Ketone)	ug/L	10 U	24	10 U	10 U	10 U	10 U	33 U	2.3 J
2-Hexanone	ug/L	10 U	6.4 J	10 U	10 U	10 U	10 U	33 U	10 U
4-Methyl-2-Pentanone (Methyl Isobutyl Ketone)	ug/L	10 UJ	2.4 J	10 U	10 U	10 U	10 U	33 U	10 U
Acetone	ug/L	10 UJ	120	10 UJ	10 UJ	10 UJ	10 U	33 U	10 UJ
Benzene	ug/L	1.0 U	2.0 U	1.0 U	1.0 U	1.0 U	1.0 U	3.3 U	1.0 U
Bromodichloromethane	ug/L	1.0 U	2.0 U	1.0 U	1.0 U	1.0 U	1.0 U	3.3 U	1.0 U
Bromoform	ug/L	1.0 U	2.0 U	1.0 UJ	1.0 UJ	1.0 UJ	1.0 U	3.3 U	1.0 UJ
Bromomethane (Methyl Bromide)	ug/L	1.0 U	2.0 U	1.0 U	1.0 U	1.0 U	1.0 U	3.3 U	1.0 U
Carbon disulfide	ug/L	1.0 U	2.0 U	1.0 U	1.0 U	1.0 U	1.0 U	3.3 U	1.0 U
Carbon tetrachloride	ug/L	1.0 U	2.0 U	1.0 U	1.0 U	1.0 U	1.0 U	3.3 U	1.0 U
Chlorobenzene	ug/L	1.0 U	2.0 U	1.0 U	1.0 U	1.0 U	1.0 U	3.3 U	1.0 U
Chloroethane	ug/L	1.0 U	2.0 U	1.0 U	1.0 U	1.0 U	1.0 U	3.3 U	1.0 U
Chloroform (Trichloromethane)	ug/L	1.0 U	0.32 J	1.0 U	1.0 U	1.0 U	1.0 U	3.3 U	0.33 J
Chloromethane (Methyl Chloride)	ug/L	1.0 U	2.0 U	1.0 UJ	1.0 UJ	1.0 UJ	1.0 U	0.51 J	1.0 UJ
cis-1,2-Dichloroethene	ug/L	1.0 UJ	2.0 U	1.0 U	1.0 U	1.8 J	1.0 U	1.8 J	1.0 U
cis-1,3-Dichloropropene	ug/L	1.0 U	2.0 U	1.0 UJ	1.0 UJ	1.0 UJ	1.0 U	3.3 U	1.0 UJ
Cyclohexane	ug/L	1.0 U	2.0 U	1.0 U	1.0 U	1.0 U	1.0 U	3.3 U	1.0 U
Dibromochloromethane	ug/L	1.0 U	2.0 U	1.0 UJ	1.0 UJ	1.0 UJ	1.0 U	3.3 U	1.0 UJ
Dichlorodifluoromethane (CFC-12)	ug/L	1.0 U	2.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.1 J	1.0 U
Ethylbenzene	ug/L	1.0 U	2.0 U	1.0 U	1.0 U	1.0 U	1.0 U	3.3 U	1.0 U
Isopropylbenzene	ug/L	1.0 U	2.0 U	1.0 U	1.0 U	1.0 U	1.0 U	3.3 U	1.0 U
Methyl acetate	ug/L	10 U	20 U	10 U	10 U	10 U	10 U	33 U	10 U
Methyl cyclohexane	ug/L	1.0 U	2.0 U	1.0 U	1.0 U	1.0 U	1.0 U	3.3 U	1.0 U
Methyl Tert Butyl Ether	ug/L	5.0 U	10 U	5.0 U	5.0 U	5.0 U	5.0 U	17 U	5.0 U
Methylene chloride	ug/L	1.0 U	2.0 U	1.0 U	1.0 U	1.0 U	1.0 U	3.3 U	1.0 U
Styrene	ug/L	1.0 U	2.0 U	1.0 U	1.0 U	1.0 U	1.0 U	3.3 U	1.0 U
Tetrachloroethene	ug/L	1.0 U	2.0 U	1.0 U	1.0 U	1.0 U	1.0 U	3.3 U	1.0 U
Toluene	ug/L	1.0 U	2.0 U	1.0 U	1.0 U	1.0 U	1.0 U	3.3 U	1.0 U
trans-1,2-Dichloroethene	ug/L	1.0 U	2.0 U	1.0 U	1.0 U	1.0 U	1.0 U	3.3 U	1.0 U
trans-1,3-Dichloropropene	ug/L	1.0 U	2.0 U	1.0 UJ	1.0 UJ	1.0 UJ	1.0 U	3.3 U	1.0 UJ
Trichloroethene	ug/L	1.0 U	3.6	1.0 U	1.0 U	1.0	1.0 U	120	54
Trichlorofluoromethane (CFC-11)	ug/L	1.0 U	2.0 U	1.0 U	1.0 U	1.0 U	1.0 U	0.81 J	1.0 U
Trifluorotrichloroethane (Freon 113)	ug/L	1.0 U	2.0 U	1.0 U	1.0 U	1.0 U	1.0 U	3.3 U	1.0 U
Vinyl chloride	ug/L	1.0 U	2.0 U	1.0 U	1.0 U	1.0 U	1.0 U	0.71 J	1.0 U
Xylene (total)	ug/L	2.0 U	4.0 U	2.0 U	2.0 U	2.0 U	2.0 U	6.7 U	2.0 U
<i>Metals</i>									
Manganese	mg/L	0.17	2.4	0.15	0.15	0.015 U	0.16	0.0014 J	0.59
Manganese (Dissolved)	mg/L	0.16	0.62	0.15	0.15	0.0068 J	0.17	0.0062 J	0.56
Potassium	mg/L	2.7 J	417	1.8 J	1.7 J	2.9 J	3.5 J	5.5	241
Potassium (Dissolved)	mg/L	2.4 J	414	1.8 J	1.7 J	3.0 J	3.4 J	5.5	233
<i>Biological</i>									
Aerobic TCE Specific Microbial Population	CFU/mL	450	170	210	130	980	ND	50	650
Aerobic Total Microbial Population	90	20000	1000	100	280	100	ND	30	25000
Anaerobic TCE Specific Microbial Population	CFU/mL	15	80	350	640	190	50	55	8100
Anaerobic Total Microbial Population	CFU/mL	2700	1700	880	1600	590	140	40	16000
<i>General Chemistry</i>									
Chloride	mg/L	433	9.7	405	436	9.5	444	211	4.3
Conductivity	nS/cm	2.18	1.303	1.7	1.7	0.818	2.17	13.27	0.975
Dissolved Oxygen	mg/L	0.2	0.19	0.19	0.19	2.23	0.19	2.76	0.35
Oxidation reduction potential	milliVolts	-240	575	-261	-261	560	-224	428	-177
pH Field	s.u.	7.29	7.15	7.3	7.3	7.11	7.2	7.16	7.52
Temperature	Deg C	13	14.7	12.6	12.6	13.6	14.9	16.7	16.1
Total Dissolved Solids (TDS)	mg/L	1200	1200	1200	1300	440	1200	690	660
Total Suspended Solids (TSS)	mg/L	7.0	11	17	11	4.0 U	8.0	4.0 U	4.0 U
Turbidity	NTU	1.7	4.53	2.52	2.52	1.0 <	1.15	1.0 <	3.88

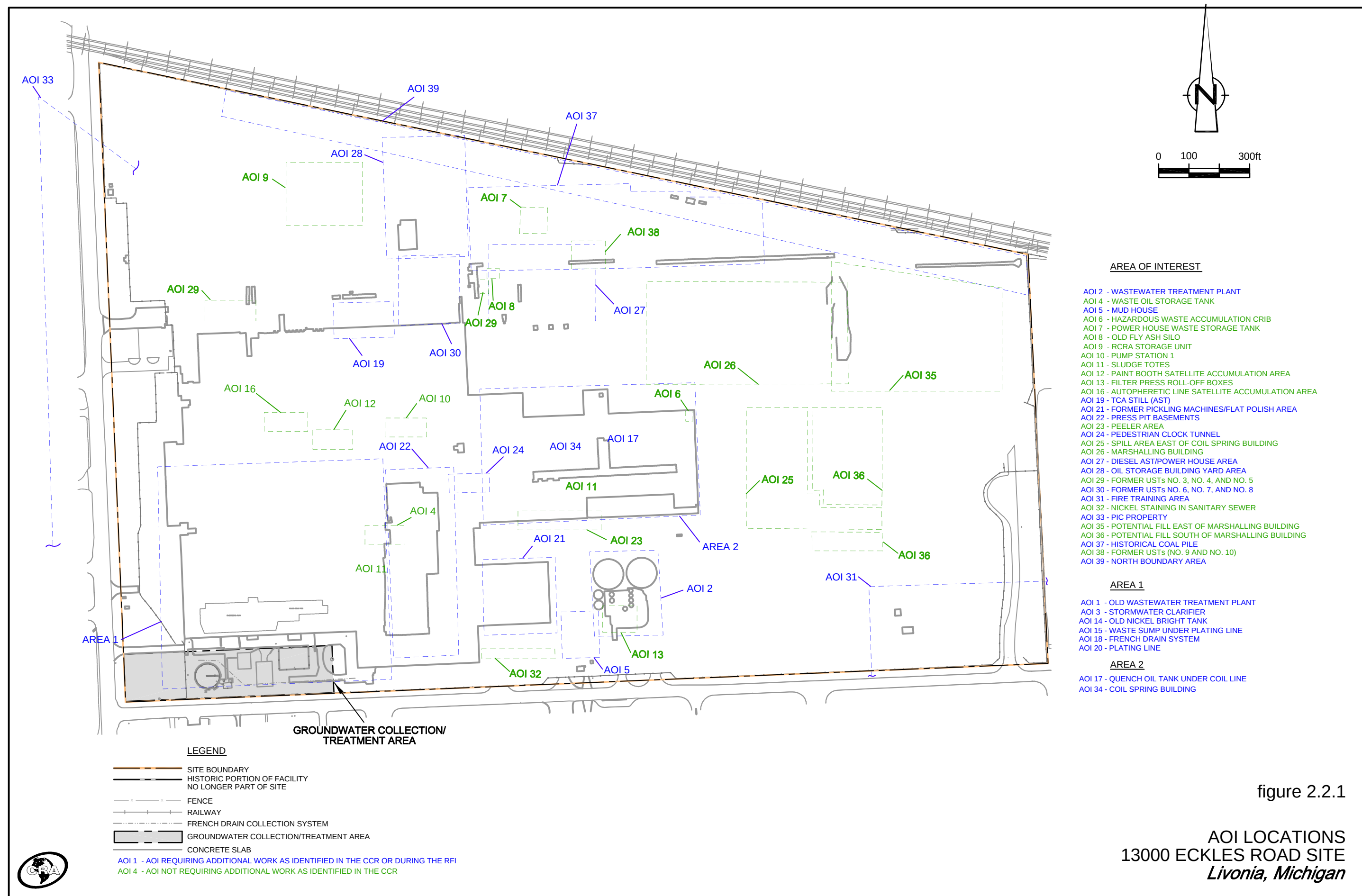
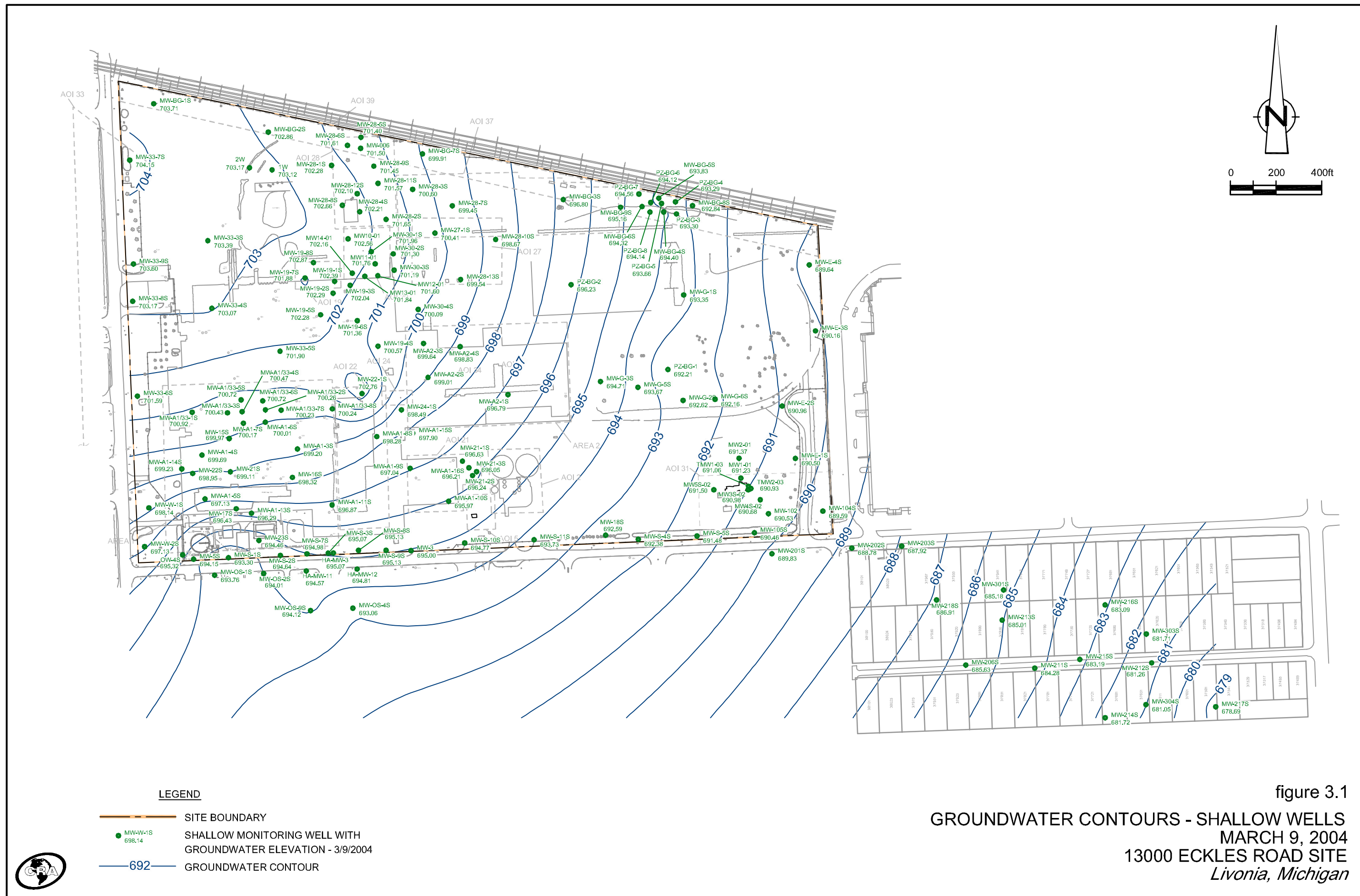
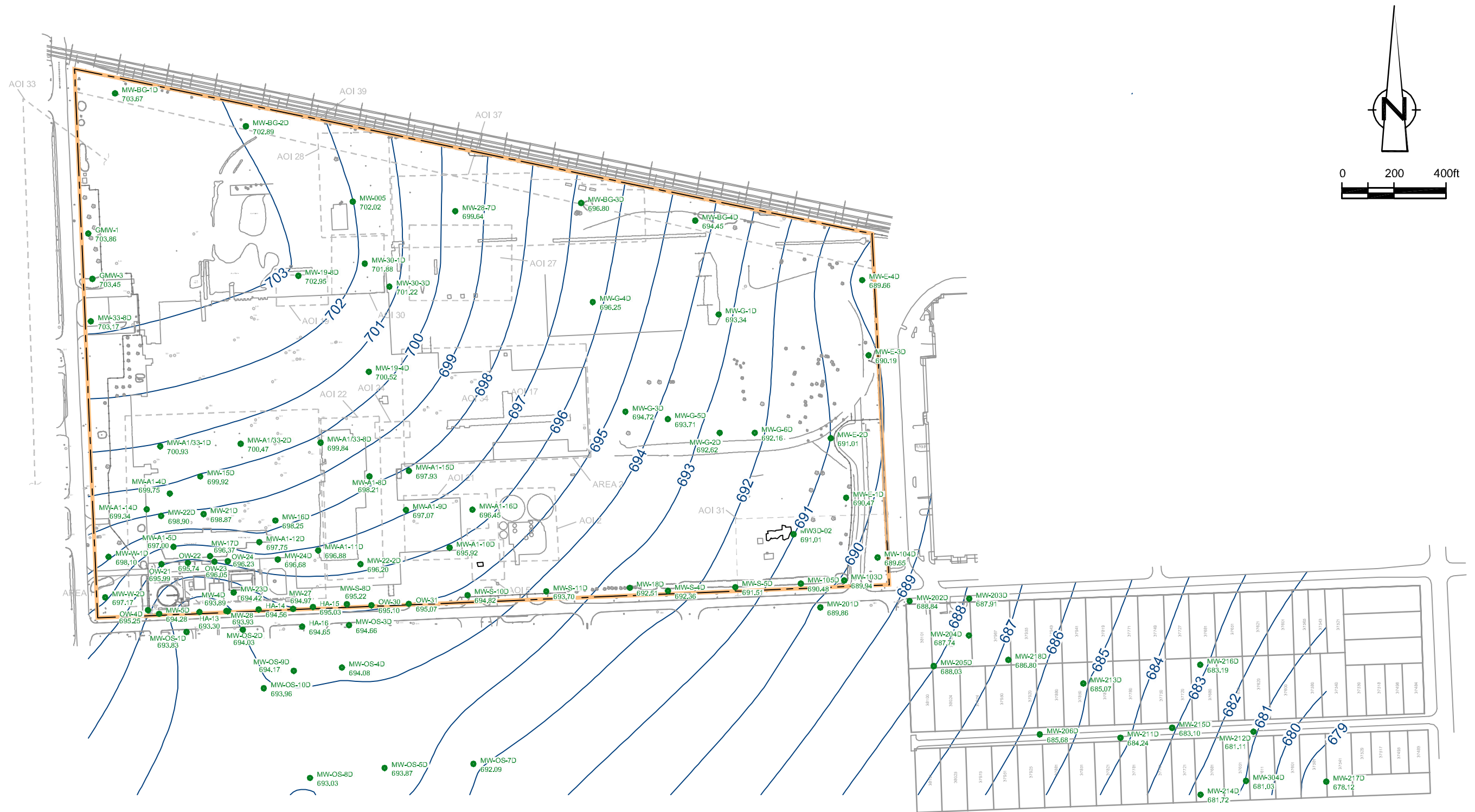


figure 2.2.1

AOI LOCATIONS
13000 ECKLES ROAD SITE
Livonia, Michigan





LEGEND

- SITE BOUNDARY
- MW-E-3D
690.19 DEEP MONITORING WELL WITH
GROUNDWATER ELEVATION - 3/9/2004
- 692 GROUNDWATER CONTOUR

figure 3.2
GROUNDWATER CONTOURS - DEEP WELLS
MARCH 9, 2004
13000 ECKLES ROAD SITE
Livonia, Michigan

