DRAFT

DUE CARE PLAN
SECTION 7A COMPLIANCE ANALYSIS
GENERAL MOTORS PARKING LOT 8
6241 CASS AVENUE
DETROIT, MICHIGAN 48202

PREPARED FOR:

ENCORE
MAIL CODE: 483-520-190
2000 CENTERPOINT PARKWAY
PONTIAC, MICHIGAN 48341

October 3, 2007

Project Number: RM073499-001

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***DRAFT* DUE CARE PLAN**
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***DRAFT* DUE CARE PLAN**
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1.0 INTRODUCTION

The Traverse Group was retained by ENCORE, a wholly owned subsidy of General Motors Corporation, to prepare a Section 7a Compliance Analysis (i.e., Due Care Plan) of the property located commonly known as Parking Lot 8, located at 6241 Cass Avenue, in the City of Detroit, Wayne County, Michigan (i.e., the "subject site"). This Due Care Plan has been prepared to meet obligations of an owner/operator as defined in Section 20107a of Part 201 of the Natural Resources and Environmental Protection Act (NREPA), Public Act 451 of 1994, as amended.

Section 20107a imposes affirmative obligations on an owner/operator of a facility, as defined by the NREPA as any area, place, or property where a contaminant is present in concentrations greater than the MDEQ Generic Residential Cleanup Criteria (GRCC).

The primary obligations of an owner/operator under Section 7a includes:

- Undertake measures to prevent exacerbation of existing contamination;
- Exercise due care by undertaking response activity necessary to mitigate unacceptable exposure to hazardous substances, mitigate fire and explosion hazards due to hazardous substances, and allow for the intended use of the facility in a manner that protects public health and safety; and
- Take reasonable precautions against the reasonably foreseeable acts or omissions of a third party and the consequences that could result from those acts or omissions.

This Due Care Plan provides information about the known environmental concerns, distribution and concentrations of contaminants, as well as appropriate response activities at the subject site. Response activities include those activities necessary to minimize or eliminate potential risks resulting from exposure to soil, groundwater, and airborne contaminants. Exposure to contaminants could occur during routine site activities such as site inspections and utility clearances, subsurface utility work or interim response activities undertaken by ENCORE as part of future uses of the site.

This Due Care Plan is also intended to provide guidance and appropriate precautions regarding the potential discovery of or exposure to additional contamination during future site activities undertaken by ENCORE. However, this Due Care Plan does not provide guidance regarding remedial or emergency response, site development, or health and safety activities performed by others. Specifically, if future site activities differ from those uses detailed in Section 2.2, revisions to this Due Care Plan will be necessary to address Section 7a requirements. In consideration of this information, this Due Care Plan should be considered a living document that may be revised as appropriate to reflect future changes in site uses.

The Due Care Plan has been developed based on observations made by The Traverse Group during site assessment activities, as well as information provided in the documents listed below:

- *Phase I Environmental Site Assessment* prepared by EnecoTech, Inc. on October 22, 1996.
- *Phase I Environmental Site Assessment,* prepared by The Traverse Group and dated January 31, 2005;
- *Phase I Environmental Site Assessment Update,* prepared by The Traverse Group and dated December 22, 2006;
- *Phase II Environmental Site Assessment – Summary of Findings,* prepared by The Traverse Group and dated April 3, 2007; and
- *Draft Lot 8 Delineation – Summary of Findings,* prepared by The Traverse Group and dated August 27, 2007.

Copies of these documents are not appended to this Due Care Plan; however, these materials are maintained on file by ENCORE. As necessary, this Due Care Plan may be amended, as needed, based on field conditions encountered during site activities or changes in future land use by the current owner/operator.

2.0 SITE CHARACTERISTICS

The following subsections describe the: 1) characteristics of the site; 2) current site use conditions; and 3) planned future use conditions, as it pertains to Section 7a obligations.

2.1 Site Description

The subject site is located at 6241 Cass Avenue on the northwestern corner of Cass and Amsterdam Avenues, in the City of Detroit, Wayne County, Michigan (**Figure 1**). In general, the site is rectangular shaped and is comprised of approximately 1.4-acres of land. The site consists of a fenced asphalt parking lot. The legal description of the subject property is provided below for reference purposes only:

Ward/Item No.: 02/002155-6

Legal Description: W PART OF O LO 116 DES AS FOLS BEG AT A PTE IN W LINE CASS AVE 80 FT WD BG ALSO IN N LINE AMSTERDAM AVE 50 FT WD TH 67D 01M 35S W 165 FT TH N 22D 443M 25S W 375.17 TH N 63D 29M 26S E 161.35 FT TH S 31D 09M 47S E 27.18 FT TH S 22D 43M 25S 358.22 FT TO P O B SUB PT CASS FARM L1 P175-6 PLATS, W C R 2/103 385.40 IRREG

2.1.1 Utility Service

Potable water and sewage disposal services for the subject site are provided by the Detroit Water and Sewerage Department (DWSD). Electrical utility service for the subject site is provided by DTE Energy. A review of natural gas utility service maps indicates that Michcon provides natural gas to the area serving the site and surrounding properties.

2.2 Planned Site Use

Currently, the site is used as a parking lot. The owner/operator of the subject site (i.e., ENCORE) intends to lease the property to a third party for continued use as a parking lot. If the use of the subject site changes, revisions or amendments to this Due Care Plan will be completed by the owner/operator.

2.3 Evaluation of Potential Human Exposure Risks Based on Planned Site Uses

In accordance with Section 7a, the potential human exposure risks associated with this property have been identified for the current and future land use as indicated in this section and above in Section 2.2. This document will not cover remedial response activities or site development activities on the part of other site activities or third parties.

A complete human exposure pathway is comprised of a source (e.g., soil containing a contaminant), an exposure route or relevant pathway (e.g., inhalation of the airborne soil particulate or vapor, or direct contact with the soil), and a receptor (e.g., a person standing at the face of an excavation, or a person placing pipe in an excavated trench, etc.). The source medium at this site consists of soil. The applicable criteria have been identified for each relevant human exposure pathway. Applicable criteria are chemical-specific concentrations that have been developed by the MDEQ. GRCC soil and groundwater cleanup goals and screening levels are based on typical human activities under a variety of land use scenarios.

The land use of the subject site is described by the MDEQ Part 201 definition of land use under Commercial IV Criteria. The human exposure risk evaluation for the subject property is described in the following subsections.

2.3.1 Soil Contamination – Risks from Direct Contact Exposures

Laboratory analytical results from the previous environmental investigations indicated that concentrations of target parameters were detected above the MDEQ's Commercial IV Direct Contact (DC) Criteria. However, the possibility of dermal exposure to contaminants in the soil is not likely based on the proposed uses at the subject property. Therefore, the direct contact pathway for soil at the subject property is not complete provided the asphalt paving at the subject site remains intact. However, in the event that subsurface workers are present at the subject site (i.e. utility workers), the direct contact pathway would be relevant and complete.

2.3.2 Soil Contamination – Risks from Ambient Air Inhalation Exposures

Laboratory analytical results of the previous environmental investigation indicated that concentrations of target parameters were not detected above the MDEQ's Commercial IV Soil

Volatilization to Ambient Air (SVAA) Criteria. Therefore, volatile emissions of contaminants in soil at the subject property to ambient air do not pose a significant exposure risk to on-site occupants and visitors.

2.3.3 Soil Contamination – Risks from Indoor Air Inhalation Exposures

Laboratory analytical results of the previous environmental investigation indicated that concentrations of target parameters were not detected above the MDEQ's Commercial IV Soil Volatilization to Indoor Air Inhalation (SVIA) Criteria. Further, no structures currently exist at the subject site. Therefore, volatile emissions of soil at the subject property to indoor air do not pose a significant exposure risk to on-site occupants or visitors.

2.3.4 Soil Contamination – Risk of Injury from Drinking Water Uses of Groundwater

Based on the results of site investigation activities, contamination has not been identified in the soil at the subject property exceeding the MDEQ's Commercial IV Drinking Water Protection (DWP) Criteria. Additionally, groundwater was not encountered on the subject property in previous environmental investigations. Therefore, the soil contamination leaching to groundwater at the subject property does not pose a significant exposure risk to on-site occupants or visitors.

2.3.5 Groundwater Contamination – Risks from Direct Contact Exposures

Groundwater was not encountered during the course of subsurface investigation and this pathway is not complete. Therefore, the Commercial IV Groundwater Contact Protection (GCP) Criteria at the subject property does not pose a significant exposure risk to on-site occupants or visitors.

2.3.6 Groundwater Contamination – Risk to Surface Water Resources

Groundwater was not encountered during the course of subsurface investigation and this pathway is not complete. Additionally, this pathway is not considered relevant as the subject property is serviced by the City of Detroit's combined sanitary and storm sewer system, which is processed by publicly owned and operated sewage treatment facilities. Therefore, the Groundwater Surface Water Interface (GSI) Criteria is not considered a relevant exposure pathway at the subject property and does not pose a significant exposure risk to on-site occupants or visitors.

2.3.7 Groundwater Contamination – Risks to Drinking Water Uses

Groundwater was not encountered during the course of subsurface investigation and this pathway is not complete. Additionally, this pathway is not considered relevant as the subject property is serviced by the City of Detroit's municipal water system. Therefore, ingestion of contaminated groundwater does not pose a significant exposure risk to on-site occupants or visitors.

2.3.8 Groundwater Contamination – Risks from Dermal (Utility) Exposures

Groundwater was not encountered during the course of subsurface investigation and this pathway is not complete. Therefore, this exposure pathway is not a relevant exposure pathway and does not pose a significant exposure risk to on-site occupants or visitors.

2.3.9 Groundwater Contamination Risks for Indoor Air Hazards

Groundwater was not encountered during the course of subsurface investigation rendering this pathway incomplete. Further, no structures currently exist at the subject site. Therefore, this exposure pathway is not a relevant exposure pathway and does not pose a significant exposure risk to on-site occupants or visitors.

2.3.10 Potential for Fire and Explosion

The nature and concentrations of the contaminants detected on the subject site are not indicative of a fire or explosion hazard. Therefore, this is not considered to be a relevant exposure concern at the subject property and does not pose a significant exposure risk to on-site occupants or visitors.

3.0 HAZARDOUS SUBSTANCE INFORMATION

The following sections: 1) present analytical data from previous investigations and provides a comparison with the applicable MDEQ Cleanup Criteria for the relevant exposure pathways (evaluated in Section 2.3 of this Due Care Plan) and the appropriate Commercial IV land use category; 2) briefly describe the potential fate and transport mechanisms of the chemical constituents detected; 3) assess the potential for health risks presented by volatilization of chemical constituents to indoor or ambient air; and 4) assess the fire and explosion hazards presented by the chemical constituents detected.

3.1 Known Contamination

Available analytical data evaluated in this Due Care Plan were collected by The Traverse Group. Soil samples were collected and analyzed for volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), and the 13 Priority Pollutant Metals, as appropriate, based on known historical operations. A summary of the analytical data is presented in **Table 1**, Summary of Soil Sample Analysis VOCs; **Table 2**, Summary of Soil Sample Analysis SVOCs; and **Table 3**, Summary of Soil Sample Analysis Metals.

Based on historical information and previous investigation results, contamination exceeding applicable MDEQ Cleanup Criteria for relevant exposure pathways for benzo(a)pyrene were identified. Soil sampling locations are depicted in **Figure 2**. Sampling locations identified to exceed applicable cleanup criteria for soil are depicted on **Figure 3**.

The following soil boring location depicted contamination at a concentration that exceeded applicable MDEQ Commercial IV Cleanup Criteria:

DB-3 (2-4')

- Benzo(a)pyrene was detected at a concentration of 12,400 ug/kg which is above the MDEQ's Commercial IV DC Criteria (11,000 ug/kg).

3.2 Chemical Fate and Transport Overview

The fate and transport of chemicals in the environment is dependent on interactions between the properties of the chemical and the physical conditions of the property both above ground and below ground. For instance, chemical properties (e.g. volatility, specific gravity, etc.) influence the manner in which a chemical is transported through water, air, and/or soil. Physical conditions of the site (e.g., geology, hydrogeology, etc.) determine the availability of media to which a chemical can be transported. Additionally, surficial barriers such as pavement can restrict the movement of chemicals through the environment and may limit the volatilization or other exfiltration processes of VOCs into the ambient air. Conversely, surface barriers that limit infiltration of precipitation into the underlying soil restrict the vertical transport of chemicals through the soil.

3.2.1 Semi-volatile Organic Compounds

SVOCS are generally considered relatively mobile and unstable. Thus SVOC concentrations at the site have likely changed over time through biological and chemical degradation and migration from the original point of release. SVOCs detected above applicable criteria at the site include benzo(a)pyrene. SVOCs may volatilize from soil pore spaces directly to ambient air or to indoor air via cracks in concrete floor slabs.

4.0 PLAN FOR RESPONSE ACTIVITY

The following subsections of this Due Care Plan describe proposed operational controls that will be implemented during current site use conditions, including third party activities, to prevent or mitigate unacceptable exposure to hazardous substances.

4.1 Additional Site Investigation Activities

If future site development activities or changes in the planned use of the site occur, revisions to this Due Care Plan should be performed to limit contaminant exposure to occupants or contractors. Depending on the change in site uses contemplated, additional site specific soil data may need to be collected to further evaluate exposure risk at the site. If this scenario is encountered, the owner/operator may need to conduct additional due care site investigation. This investigation may involve the collection and analysis of additional soil samples.

4.2 Worker Safety

Worker safety is the responsibility of the contractor, trade, or utility service provider. This Due Care Plan provides site-specific environmental data the site worker can use to prepare their site-specific Health and Safety Plan (HASP). The use of authorized and trained personnel will be required during any site activities. Site personnel will use safety equipment to prevent direct contact of site soils (i.e., gloves, boots, etc.) known to contain substances at concentrations greater than the applicable DC Criteria.

Site personnel will also be required to exercise due care to prevent unreasonable exposures to potential unidentified contaminants by using appropriate personal protective equipment

including respiratory protection when disturbing on-site soils where soils have not been investigated.

4.3 Soil Handling Activities

In the event that earth-moving activities (e.g., subsurface work for new or repaired utilities) will be performed at the site, precautions will need to taken to meet owner/operator due care obligations. Consequently, soil generated by excavation activities will be stockpiled on plastic sheeting (or an equivalent engineering control) in a designated area on-site and covered with plastic sheeting. The stockpiled soil piles will be properly sampled and characterized by an environmental professional. Based on the soil characterization, the soil piles will either be properly disposed, or used as on-site backfill. Soil characterization requirements (e.g., type of analysis, number of tests, etc.) will be determined by the environmental professional and the disposal facility.

An authorized environmental professional will be designated to provide guidance and on-site supervision of excess soil handling and disposal, including collecting soil samples for chemical analysis, as necessary. Verification of remediation sampling will be performed if appropriate. Areas sampled for verification of remediation will be backfilled with clean fill.

Backhoes, excavators, pumps, temporary storage tanks, and other construction equipment will be adequately decontaminated if contact is made with grossly contaminated soils. Decontamination rinsate and other wastes from decontamination procedures will be properly collected on-site and be properly characterized for off-site disposal in accordance with state and federal guidelines.

4.4 Engineering Controls

Currently, the site is a maintained asphalt parking lot. Engineering controls on the site consist of maintaining the asphalt parking lot to prohibit dermal contact with contaminated soils on-site.

4.5 Wastes Generated During Future Site Investigation Activities

Based on the future use of the site, no investigative derived wastes are anticipated to be generated. However, in the event that additional due care site investigation activities are performed, wastes generated from these activities (i.e., soil cuttings) may be generated. If these

wastes are generated they will be containerized appropriately and staged on-site for future off-site disposal. The wastes will be properly characterized, transported, and disposed in accordance with applicable state and federal guidelines.

4.6 Protection of Public Health and Safety

Mitigating factors that address general protection of the public during any subsurface utility trenching or parking lot repair or replacement activities will be included in the contractor's HASP.

If subsurface utility trenching or parking lot repair or replacement activities are required and contaminated soils are discovered, the contractor shall stockpile the soil and maintain a barrier or appropriate surface cover over the contaminated soil that will be exposed.

If the asphalt surface is removed, the contractor will employ security measures to restrict access to the site (i.e., the site will be fenced in and access will be restricted).

4.7 Identification of Unknown Contamination

During any activity that involves contact with subsurface soils (i.e., excavation), there is the potential to encounter contamination or other buried containers or structures that are remnants of historical land use. Contact with contaminated soils or buried items can have an adverse effect on human health or the environment if not handled properly. Therefore, if unanticipated concerns are encountered (e.g., underground storage tanks, piping, buried drums, or other underground structures), a designated environmental professional will be notified immediately so an assessment of the potential for employee exposure or environmental impact can be conducted. A determination involving the environmental professional, the owner/operator, and the site work contractors will be performed to determine appropriate response actions and whether or not subsurface activities will continue. Notification to the MDEQ will be made if required.

Upon discovery of any abandoned waste containers, workers are to refrain from opening or moving such containers until the designated environmental professional and owner/operator has been consulted for further instructions. In the event that previously unidentified contamination is

identified during site activities, an addendum to this Due Care Plan will be prepared as appropriate.

4.8 Unforeseen Future Land Use by Owner/Operator

In the event that future site use conditions change on the part of the owner/operator, this Due Care Plan will be amended, as necessary. In the event that ownership or site operational control is transferred to another party, a separate Due Care Plan will be prepared to address the specific site uses and the associated due care obligations.

4.9 Other Considerations

As part of site redevelopment, maintenance, renovation, or public work activities, various situations may be encountered that have the potential to affect the owner/operator's due care obligations or require compliance with other environmental and health and safety regulations that are outside of the purview of this plan. The following sections of this plan provide limited information to assist the owner/operator with enacting appropriate response measures.

4.9.1 General Facility Maintenance and Renovation Activities

In the event that future site renovation plans involve activities that will disturb surface or subsurface soils, the owner/operator will need to evaluate whether violations of their due care obligations may occur and is subject to the guidance provided in this Due Care Plan. Examples of these activities may include (but are not necessarily limited to): site excavation, concrete or asphalt pavement removal, and the installation of new utilities or foundation footings. If these activities exceed the guidance provided within this Due Care Plan, revisions to this plan should be completed prior to the commencement of these activities. Once these revisions have been completed, the procedures outlined in the revised Due Care Plan should be enacted to meet the owner/operator's due care obligations.

4.9.2 Other Third Party Activities

Third parties, which may include utility workers with access to the site, right of way easements, and the property boundaries, could potentially be exposed to on-site soil via direct contact, airborne particulate inhalation, and inhalation of contaminants that have volatilized from soil.

Occasional subsurface utility work performed in close proximity to the site could result in worker exposure to contamination and may be the result of typical utility service repairs or modifications to utilities and roadway features that border or passes through the subject site. Because of this potential, exposure to contaminants would be entirely dependent on the distribution of contaminants in proximity to the work location(s). Prior to the commencement of these activities, the owner/operator may consider to notify contractors of pertinent information contained in this Due Care Plan and other site investigation documents so that potential health and environmental risks can be appropriately managed.

5.0 EVALUATION AND DEMONSTRATION OF SECTION 7A COMPLIANCE

The following subsections describe how the pre-development activities at the property affect the owner/operator Section 7aCA obligations. The discussion addresses the following items:

- How the proposed property use by owner/operator (i.e., ENCORE) will not exacerbate existing contamination or increase response costs;
- How exposure to contamination will be eliminated, prevented, or mitigated and communicated to third parties; and
- What precautions will be taken against the reasonably foreseeable acts or omissions of a third party and how these precautions will be effective.

5.1 Exacerbation

The planned uses of the site by ENCORE will not exacerbate existing contamination. Operational controls will be implemented during any construction or subsurface activities to either prevent or mitigate the release or spread of contaminated soil.

The proposed operational and engineering controls will not increase response costs because, pursuant to Section 7a, Rule 1007, the increase in handling and response costs would likely be small in relation to the total cost to remediate the property to meet Residential and Commercial I land use criteria.

5.2 Due Care Obligations

Subsurface activities, construction of buildings, and/or parking lot repair or replacement will be conducted in a manner that protects human health and the environment in accordance with the contractor's HASP. The contractor's HASP will comply with regulations and guidance regarding handling hazardous materials and include provisions to prevent contamination in the form of soil, sediment, water, or airborne particulate from leaving the site (as described in Section 4.0).

In accordance with Section 7a, Rule 1017, if the owner/operator has knowledge that a hazardous substance is emanating from, has emanated from, or is likely to be emanating from the property and migrating beyond the boundaries of the property then the MDEQ will be notified in writing within the timeframes specified in Rule 1017(2). The owner/operator will undertake appropriate response activities in accordance with Rule 1017(4) as necessary to mitigate unacceptable exposures to hazardous substances everywhere within the facility and to comply with applicable laws and regulations.

5.3 Reasonable Precautions

Effective precautions will be taken against the reasonable foreseeable acts or omissions of a third party. Personnel who may work at the site during any subsurface activities, building construction, and parking lot repair or replacement activities in the future, and who may come into contact with subsurface soils will be notified by the owner/operator of the presence and nature of the existing contamination will be provided access to this Due Care Plan. Ideally, such notification will occur as part of the proposal and project scoping process so that the appropriate precautions can be budgeted and incorporated in the scope of work as necessary.

Workers will be required to conduct their activities in a manner consistent with this Due Care Plan and the specified measures described herein.

Site access during any construction activities will be restricted to prevent trespassing. Only personnel escorted by owner/operator or its designated representatives will be allowed into the restricted access areas. Signage will be appropriately posted to identify no entry of restricted access to unauthorized parties.

5.4 Compliance Documentation

Rule 1003(4) of Part 10 of Section 21017aCA requires documentation of compliance with Due Care provisions to be made available to MDEQ upon request. Preparation of this plan only partially fulfills this requirement. Additional record-keeping may include:

- Information regarding the installation and maintenance of exposure barriers or other engineering controls not visible to inspection;
- Documentation of the response activities and other measures implemented to mitigate unacceptable exposures such as work schedule adjustments and personal protective equipment used during demolition and removal activities. This may include air monitoring results, as appropriate; and
- Documentation of the measures implemented to mitigate exacerbation of contamination, such as photographs of work practices and daily construction field logs.

6.0 REFERENCES

During the completion of this Due Care Plan, various documents were utilized to aid in its completion. Data presentation, summaries, and conclusions in this plan are general in nature and should not be considered apart from respective documents:

- *Phase I Environmental Site Assessment* prepared by EnecoTech, Inc. on October 22, 1996.
- *Phase I Environmental Site Assessment,* prepared by The Traverse Group and dated January 31, 2005;
- *Phase I Environmental Site Assessment Update,* prepared by The Traverse Group and dated December 22, 2006;
- *Phase II Environmental Site Assessment – Summary of Findings,* prepared by The Traverse Group and dated April 3, 2007;
- *Draft Lot 8 Delineation – Summary of Findings,* prepared by The Traverse Group and dated August 27, 2007;

- *Instructions for Preparing and Disclosing Baseline Environmental Assessments and Section 7a Compliance Analyses to the Michigan Department of Environmental Quality and for Requesting Optional Determinations, Michigan Department of Environmental Quality,* dated March 11, 1999; and

7.0 LIMITATIONS

The information and opinions provided in this Due Care Plan are for the exclusive use of ENCORE. No distribution to or reliance by other parties may occur without the express written permission of The Traverse Group. The Traverse Group will not distribute this report without consent or as required by law or by a Court order. The information and opinions contained in this plan are given in light of that assignment. This Due Care Plan must be reviewed and relied upon only in conjunction with the terms and conditions expressly agreed upon by the parties and as limited therein. Any third parties who have been extended the right to rely on the contents of this plan by The Traverse Group (which is expressly required prior to any third-party release), agrees to be bound by the original terms and conditions entered into by The Traverse Group and ENCORE.

Subject to the above and the terms and conditions, The Traverse Group accepts responsibility for the competent performance of its duties in executing the assignment and preparing this document in accordance with the normal standards of the profession, but disclaims any responsibility for consequential damages. Although The Traverse Group believes that information presented in this Due Care Plan is reliable, The Traverse Group cannot warrant or guarantee that the information provided is exhaustive or that the information provided by ENCORE or third parties is complete or accurate.

8.0 QUALIFICATIONS AND SIGNATURES OF PROFESSIONALS

Professional services provided by The Traverse Group and its findings and recommendations were prepared in accordance with customary principles and practices in the fields of environmental science and engineering. This warranty is in lieu of all other warranties either expressed or implied. This firm is not responsible for independent conclusions, opinions or recommendations made by others based on the field exploration data presented in this document. It is noted that the information used to prepare this Due Care Plan is based on environmental site assessments that are inherently limited in the sense that conclusions are drawn and recommendations developed from information obtained from limited research and site evaluation. The results and conclusions presented herein are based solely on the aforementioned results of these investigations. Additionally, the passage of time may result in a change in the environmental characteristics of the subject site and properties located in the surrounding area.

During the preparation of this Due Care Plan, the following environmental professionals were involved in its completion.

Prepared By:

DRAFT

Julie S. Barton
Environmental Scientist

Reviewed By:

DRAFT

Deanna L. Hutsell, EIT
Project Manager

FIGURES

TABLES

APPENDIX A

ACKNOWLEDGEMENT SIGNATURE SHEET

ACKNOWLEDGEMENT SIGNATURE SHEET

I have read, acknowledged, and understand the referenced Due Care Plan and agree to implement the preventative and cautionary measures described.

Signature	Printed Name	Type of Work Performed	Representing

DRAFT Table 1
Summary of Soil Sample Analysis - VOCs
6241 Cass Avenue
Detroit, Michigan

	Industrial and Commercial II, III, and IV Criteria																		
Chemical	**Groundwater Contact Protection Criteria (µg/kg)**	**Soil Volatilization to Indoor Air Inhalation Criteria (µg/kg)**	**Infinite Source Volatile Soil Inhalation Criteria (VSIC) (µg/kg)**	**Particulate Soil Inhalation Criteria (µg/kg)**	**Commercial IV Direct Contact Criteria (µg/kg)**	**Soil Saturation Concentration Screening Levels (µg/kg)**	**Most Stringent Criteria (µg/kg)**	**GP-1 (8-10')**	**GP-1 (8-10') Duplicate**	**GP-2 (2-4')**	**GP-3 (2-4)**	**GP-4 (4-6')**	**GP-5 (4-6')**	**TP-1 (West Bottom)**	**TP-1 (West Bottom) Duplicate**	**TP-1 (South Wall)**	**TP-2 (North Wall)**	**TP-2 (South Wall)**	**MDL (µg/kg)**
Date Collected								3/6/2007	3/6/2007	3/6/2007	3/6/2007	3/6/2007	3/6/2007	3/7/2007	3/7/2007	3/7/2007	3/7/2007	3/7/2007	
PID Reading (ppmv)								11.3	11.3	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
VOCs (EPA Method 8260)																			
Acetone (I)	110,000,000(C)	110,000,000(C)	160,000,000	170,000,000,000	86,000,000	110,000,000	86,000,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	1,000
Acrylonitrile (I)	280,000	35,000	17,000	58,000,000	87,000	8,300,000	17,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	2,500
Benzene (I)	220,000	8,400	45,000	470,000,000	400,000(C)	400,000	8,400	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	50
Bromodichloromethane	280,000	6,400	31,000	110,000,000	570,000	1,500,000	6,400	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	100
Bromoform	870,000(C)	770,000	3,100,000	3,600,000,000	870,000(C)	870,000	770,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
Bromomethane	1,400,000	1,600	13,000	150,000,000	1,200,000	2,200,000	1,600	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	200
n-Butylbenzene	120,000	ID	ID	ID	9,400,000	10,000,000	120,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	50
sec-Butylbenzene	88,000	ID	ID	ID	9,400,000	10,000,000	88,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	50
tert-Butylbenzene (I)	180,000	ID	ID	ID	9,400,000	10,000,000	180,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	50
Carbon tetrachloride	92,000	990	12,000	170,000,000	390,000(C)	390,000	990	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	50
Chlorobenzene (I)	260,000(C)	220,000	920,000	2,100,000,000	260,000(C)	260,000	220,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	50
Chloroethane	950,000(C)	950,000(C)	36,000,000	290,000,000,000	950,000(C)	950,000	950,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	250
Chloroform	1,500,000(C)	38,000	150,000	1,600,000,000	1,500,000(C)	1,500,000	38,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
Chloromethane (I)	1,100,000(C)	10,000	120,000	2,600,000,000	1,100,000(C)	1,100,000	10,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	250
Dibromochloromethane	360,000	21,000	80,000	160,000,000	580,000	610,000	21,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	250
1,2-Dichlorobenzene	210,000(C)	210,000(C)	46,000,000	44,000,000,000	210,000(C)	210,000	210,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	100
1,3-Dichlorobenzene	51,000	ID	ID	ID	170,000(C)	170,000	51,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	100
1,4-Dichlorobenzene	140,000	100,000	260,000	570,000,000	2,200,000	NA	100,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	100
1,1-Dichloroethane	890,000(C)	430,000	2,500,000	15,000,000,000	890,000(C)	890,000	430,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	50
1,2-Dichloroethane (I)	380,000	11,000	21,000	150,000,000	490,000	1,200,000	11,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	50
1,1-Dichloroethene (I)	220,000	330	3,700	78,000,000	570,000(C)	570,000	330	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	50
cis-1,2-Dichloroethene	640,000(C)	41,000	210,000	1,000,000,000	640,000(C)	640,000	41,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	50
trans-1,2-Dichloroethene	1,400,000(C)	43,000	330,000	2,100,000,000	1,400,000(C)	1,400,000	43,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	50
1,2-Dichloropropane (I)	320,000	7,400	30,000	120,000,000	550,000(C)	550,000	7,400	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	50
cis-1,3-Dichloropropane	**	**	**	**	**	**	**	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	50
trans-1,3-Dichloropropene	110,000	5,400	60,000	590,000,000	290,000	620,000	5,400	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	50
Ethylbenzene (I)	140,000(C)	140,000(C)	2,400,000	13,000,000,000	140,000(C)	140,000	140,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	50
Isopropylbenzene	390,000(C)	390,000(C)	2,000,000	2,600,000,000	390,000(C)	390,000	390,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	250
2-Methylnaphthalene	5,500,000	ID	ID	ID	31,000,000	NA	5,500,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	330
Methylene chloride	2,300,000(C)	240,000	700,000	8,300,000,000	2,300,000(C)	2,300,000	240,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	100
4-Methyl-2-pentanone (MIBK) (I)	2,700,000(C)	2,700,000(C)	53,000,000	60,000,000,000	2,700,000(C)	2,700,000	2,700,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	2,500
Methyl tert-butyl ether (MTBE)	5,900,000(C)	5,900,000(C)	30,000,000	88,000,000,000	5,900,000(C)	5,900,000	5,900,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	250
Naphthalene	2,100,000	470,000	350,000	88,000,000	61,000,000	NA	350,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	330
n-Propylbenzene (I)	300,000	ID	ID	ID	590,000,000	9,400,000	10,000,000	300,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	100
Styrene	270,000	520,000(C)	3,300,000	6,900,000,000	520,000(C)	520,000	270,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	50
1,1,1,2-Tetrachloroethane	440,000(C)	33,000	120,000	530,000,000	440,000(C)	440,000	33,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	100
1,1,2,2-Tetrachloroethane	94,000	23,000	34,000	68,000,000	290,000	870,000	23,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	50
Tetrachloroethene	88,000(C)	60,000	600,000	6,800,000,000	88,000(C)	88,000	60,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	50
Toluene (I)	250,000(C)	250,000(C)	3,300,000	12,000,000,000	250,000(C)	250,000	250,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	100
1,2,3-Trichlorobenzene	**	**	**	**	**	**	**	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	250
1,2,4-Trichlorobenzene	1,100,000	1,100,000(C)	34,000,000	11,000,000,000	1,100,000(C,DD)	1,100,000	1,100,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	250
1,1,1-Trichloroethane	460,000(C)	460,000	4,500,000	29,000,000,000	460,000(C)	460,000	460,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	50
1,1,2-Trichloroethane	420,000	24,000	57,000	250,000,000	920,000(C)	920,000	24,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	50
Trichloroethylene	440,000	37,000	260,000	2,300,000,000	500,000(C,DD)	500,000	37,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	70	50
Trichlorofluoromethane	560,000(C)	560,000(C)	110,000,000	1,700,000,000,000	560,000(C)	560,000	560,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	100
1,2,4-Trimethylbenzene (I)	110,000(C)	110,000(C)	25,000,000	36,000,000,000	110,000(C)	110,000	110,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	100
1,3,5-Trimethylbenzene (I)	94,000(C)	94,000(C)	19,000,000	36,000,000,000	94,000(C)	94,000	94,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	100
Vinyl chloride	20,000	2,800	29,000	890,000,000	40,000	490,000	2,800	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	40
Xylenes (I)	150,000(C)	150,000(C)	54,000,000	130,000,000,000	150,000(C)	150,000	150,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	150

DD=Hazardous substance causes developmental effects. Residential and Commercial I DCC are protective of both prenatal and postnatal exposure. Industrial and Commercial II, III, & IV DCC are protective for an adult pregnant receptor. C=Value presented is a screening level based on the chemical-specific generic soil saturation concentration (Csat) since the calculated risk-based criterion is greater than Csat. I=Hazardous substance may exhibit the characteristic of ignitability as defined in 40 CFR 261.21. ID=Inadequate date to develop criterion. J=Hazardous substance may be present in several isomer forms. Isomer-specific concentrations must be added together for comparison to criteria. M=Calculated criterion is below the analytical target detection limit (TDL), therefore, the criterion defaults to the TDL. NA=Criterion or value is not available or, as is the case for Csat, not applicable. ND=Analyte not detected above method detection limits. NR=Analysis for this parameter was not requested. R=Hazardous substance may exhibit the characteristic of reactivity as defined in 40 CFR 261.23. W=Concentrations of trihalomethanes in soil must be added together to determine compliance with the DWPC of 2,000 ug/kg. X=The GSI criterion shown is not protective for surface water that is used as a drinking water source. **- Hazardous substance does not have criteria published in Operational Memorandum No. 18. ND=No laboratory detections.

Where two numbers are present in a cell, the first number is the Target Detection Limit (TDL) and the second number is the risk-based value

DRAFT Table 2
Summary of Soil Sample Analysis - SVOCs
6241 Cass Avenue
Detroit, Michigan

	Industrial and Commercial II, III, and IV Criteria																					
Chemical	**Groundwater Contact Protection Criteria (µg/kg)**	**Soil Volatilization to Indoor Air Criteria (µg/kg)**	**Infinite Source Volatile Soil Inhalation Criteria (VSIC) (µg/kg)**	**Particulate Soil Inhalation Criteria (µg/kg)**	**Commercial IV Direct Contact Criteria (µg/kg)**	**Soil Saturation Concentration Screening Levels (µg/kg)**	**Most Stringent Criteria (µg/kg)**	**GP-1 (8-10')**	**GP-1 (8-10') Duplicate**	**GP-2 (2-4')**	**GP-3 (2-4)**	**GP-4 (4-6')**	**GP-5 (4-6')**	**TP-1 (West Bottom)**	**TP-1 (West Bottom) Duplicate**	**TP-1 (South Wall)**	**TP-2 (North Wall)**	**TP-2 (South Wall)**	**DB-1 (2-4')**	**DB-2 (2-4')**	**DB-2 (10-12')**	**DB-3 (2-4')**	**DB-4 (2-4')**	**DB-4 (10-12')**
Date Collected								3/6/2007	3/6/2007	3/6/2007	3/6/2007	3/6/2007	3/6/2007	3/7/2007	3/7/2007	3/7/2007	3/7/2007	3/7/2007	8/2/2007	8/2/2007	8/2/2007	8/2/2007	8/2/2007	8/2/2007
PID Reading (ppmv)								11.3	11.3	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.2	0.3	0.2	0.3	0.3	0.2
SVOCs (EPA Method 8270)																								
Acenaphthene	970,000	350,000,000	97,000,000	6,200,000,000	150,000,000	NA	970,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	320	ND	555	ND	ND
Acenaphthylene	440,000	3,000,000	2,700,000	1,000,000,000	6,100,000	NA	440,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	776	ND	2,170	ND	ND
Anthracene	41,000	1,000,000,000(D)	1,600,000,000	29,000,000,000	860,000,000	NA	41,000	ND	ND	ND	1,100	ND	ND	ND	ND	ND	ND	ND	ND	1,410	ND	2,250	ND	ND
Benz(a)anthracene(Q)	NLL	NLV	NLV	ID	110,000	NA	110,000	ND	ND	ND	2,800	ND	2,100	ND	ND	ND	ND	ND	131	<1,850	ND	13,700	ND	ND
Benzo(b)fluoranthene(Q)	NLL	ID	ID	ID	110,000	NA	110,000	ND	ND	ND	2,300	ND	2,000	ND	ND	ND	ND	ND	121	<2,330	ND	14,400	ND	ND
Benzo(k)fluoranthene(Q)	NLL	NLV	NLV	ID	1,100,000	NA	1,100,000	ND	ND	ND	1,900	ND	2,000	ND	ND	ND	ND	ND	ND	3,220	ND	8,410	ND	ND
Benzo(g,h,i)perylene	NLL	NLV	NLV	350,000,000	9,500,000	NA	9,500,000	ND	ND	ND	1,500	ND	1,600	ND	ND	ND	ND	ND	ND	1,400	ND	2,350	ND	ND
Benzo(a)pyrene(Q)	NLL	NLV	NLV	1,900,000	11,000	NA	11,000	ND	ND	ND	2,600	ND	2,400	ND	ND	ND	ND	ND	108	6,580	ND	**12,400**	ND	ND
Bis(2-chloroethoxy)methane	**	**	**	**	**	**	**	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NR	NR	NR	NR	NR	NR
Bis(2-chloroethyl)ether (I)	110,000	44,000	13,000	12,000,000	68,000	2,200,000	13,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NR	NR	NR	NR	NR	NR
Bis(2-chloroisopropyl)ether	**	**	**	**	**	**	**	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NR	NR	NR	NR	NR	NR
Bis(2-ethylhexyl)phthalate	NLL	NLV	NLV	890,000,000	10,000,000(C)	10,000,000	10,000,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NR	NR	NR	NR	NR	NR
Butyl benzyl phthalate	310,000(C)	NLV	NLV	21,000,000,000	310,000(C)	310,000	310,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NR	NR	NR	NR	NR	NR
2-Chloronaphthalene	**	**	**	**	**	**	**	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NR	NR	NR	NR	NR	NR
4-Chloro-3-methylphenol	3,000,000	NLV	NLV	ID	17,000,000	NA	3,000,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NR	NR	NR	NR	NR	NR
2-Chlorophenol	1,900,000	ID	ID	ID	5,300,000	19,000,000	1,900,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NR	NR	NR	NR	NR	NR
4-Chlorophenyl phenyl ether	**	**	**	**	**	**	**	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NR	NR	NR	NR	NR	NR
Chrysene (Q)	NLL	ID	ID	ID	11,000,000	NA	11,000,000	ND	ND	ND	3,100	ND	2,200	ND	ND	ND	ND	ND	104	ND	ND	ND	ND	ND
Dibenzo(a,h)anthracene(Q)	NLL	NLV	NLV	ID	11,000	NA	11,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	641	ND	1,100	ND	ND
Dibenzofuran	ID	ID	ID	ID	ID	NA	ID	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NR	NR	NR	NR	NR	NR
Di-n-butyl phthalate	760,000(C)	NLV	NLV	1,500,000,000	760,000(C)	760,000	760,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NR	NR	NR	NR	NR	NR
2,4-Dichlorophenol	960,000	NLV	NLV	2,300,000,000	1,800,000(C,DD)	1,800,000	960,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NR	NR	NR	NR	NR	NR
Diethyl phthalate	740,000(C)	NLV	NLV	1,500,000,000	740,000(C)	740,000	740,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NR	NR	NR	NR	NR	NR
2,4-Dimethylphenol	10,000,000	NLV	NLV	2,100,000,000	43,000,000	NA	10,000,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NR	NR	NR	NR	NR	NR
Dimethyl phthalate	790,000(C)	NLV	NLV	1,500,000,000	790,000(C)	790,000	790,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NR	NR	NR	NR	NR	NR
4,6-Dinitro-2-methylphenol	**	**	**	**	**	**	**	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NR	NR	NR	NR	NR	NR
2,4-Dinitrophenol	**	**	**	**	**	**	**	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NR	NR	NR	NR	NR	NR
2,4-Dinitrotoluene	170,000	NLV	NLV	20,000,000	260,000	NA	170,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NR	NR	NR	NR	NR	NR
2,6-Dinitrotoluene	**	**	**	**	**	**	**	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NR	NR	NR	NR	NR	NR
Di-n-octyl phthalate	140,000,000(C)	NLV	NLV	ID	26,000,000	140,000,000	26,000,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NR	NR	NR	NR	NR	NR
Fluoranthene	730,000	1,000,000,000(D)	890,000,000	4,100,000,000	170,000,000	NA	730,000	ND	ND	ND	7,000	ND	2,600	ND	ND	ND	ND	ND	249	ND	ND	ND	ND	ND
Fluorene	890,000	1,000,000,000(D)	150,000,000	4,100,000,000	100,000,000	NA	890,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	407	ND	720	ND	ND
Hexachlorobenzene (C-66)	8,200	220,000	56,000	8,500,000	49,000	NA	8,200	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NR	NR	NR	NR	NR	NR
Hexachlorobutadiene (C-46)	350,000(C)	350,000(C)	460,000	180,000,000	350,000(C)	350,000	350,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NR	NR	NR	NR	NR	NR
Hexachlorocyclopentadiene (C-56)	720,000(C)	56,000	60,000	5,900,000	720,000(C)	720,000	56,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NR	NR	NR	NR	NR	NR
Hexachloroethane	110,000	79,000	660,000	100,000,000	860,000	NA	79,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NR	NR	NR	NR	NR	NR
Indeno(1,2,3-cd)pyrene(Q)	NLL	NLV	NLV	ID	110,000	NA	110,000	ND	ND	ND	1,400	ND	1,400	ND	ND	ND	ND	ND	ND	1,620	ND	2,780	ND	ND
Isophorone	2,400,000(C)	NLV	NLV	8,200,000,000	2,400,000(C)	2,400,000	2,400,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NR	NR	NR	NR	NR	NR
2-Methylnaphthalene	5,500,000	ID	ID	ID	31,000,000	NA	5,500,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	230	ND	338	ND	ND
2-Methylphenol (o-Cresol) (J)	16,000,000	NLV	NLV	2,900,000,000	43,000,000	NA	16,000,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NR	NR	NR	NR	NR	NR
3-Methylphenol (m-Cresol) (J)	16,000,000	NLV	NLV	2,900,000,000	43,000,000	NA	16,000,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NR	NR	NR	NR	NR	NR
4-Methylphenol (p-Cresol) (J)	16,000,000	NLV	NLV	2,900,000,000	43,000,000	NA	16,000,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NR	NR	NR	NR	NR	NR
Naphthalene	2,100,000	470,000	350,000	88,000,000	61,000,000	NA	350,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	352	ND	500	ND	ND
2-Nitroaniline	**	**	**	**	**	**	**	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NR	NR	NR	NR	NR	NR
3-Nitroaniline	**	**	**	**	**	**	**	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NR	NR	NR	NR	NR	NR
4-Nitroaniline	**	**	**	**	**	**	**	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NR	NR	NR	NR	NR	NR
Nitrobenzene (I)	220,000	170,000	64,000	21,000,000	390,000	490,000	64,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NR	NR	NR	NR	NR	NR
2-Nitrophenol	1,600,000	NLV	NLV	ID	2,400,000	NA	1,600,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NR	NR	NR	NR	NR	NR
4-Nitrophenol	**	**	**	**	**	**	**	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NR	NR	NR	NR	NR	NR
N-Nitrosodiphenylamine	700,000	NLV	NLV	ID	9,200,000	NA	700,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NR	NR	NR	NR	NR	NR
N-Nitroso-di-n-propylamine	7,200	NLV	NLV	2,000,000	6,400	1,500,000	6,400	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NR	NR	NR	NR	NR	NR
Pentachlorophenol	4,300	NLV	NLV	130,000,000	490,000	NA	4,300	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NR	NR	NR	NR	NR	NR
Phenanthrene	1,100,000	5,100,000	190,000	2,900,000	6,100,000	NA	190,000	ND	ND	ND	4,700	ND	700	ND	ND	ND	ND	ND	230	4,120	ND	14,100	ND	ND
Phenol	12,000,000(C)	NLV	NLV	18,000,000,000	12,000,000(C,DD)	12,000,000	12,000,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NR	NR	NR	NR	NR
Pyrene	480,000	1,000,000,000(D)	780,000,000	2,900,000,000	110,000,000	NA	480,000	ND	ND	ND	6,000	ND	2,500	ND	ND	ND	ND	ND	185	ND	ND	ND	ND	ND
2,4,5-Trichlorophenol	9,100,000	NLV	NLV	10,000,000,000	86,000,000	NA	9,100,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NR	NR	NR	NR	NR	NR
2,4,6-Trichlorophenol	200,000	NLV	NLV	1,300,000,000	3,900,000	NA	200,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NR	NR	NR	NR	NR	NR

DD=Hazardous substance causes developmental effects. Residential and Commercial I DCC are protective of both prenatal and postnatal exposure. Industrial and Commercial II, III, & IV DCC are protective for an adult pregnant receptor. C=Value presented is a screening level based on the chemical-specific generic soil saturation concentration (Csat) since the calculated risk-based criterion is greater than Csat. I=Hazardous substance may exhibit the characteristic of ignitability as defined in 40 CFR 261.21. ID=Inadequate date to develop criterion. J=Hazardous substance may be present in several isomer forms. Isomer-specific concentrations must be added together for comparison to criteria. M=Calculated criterion is below the analytical target detection limit (TDL), therefore, the criterion defaults to the TDL. NA=Criterion or value is not available or, as is the case for Csat, not applicable. ND=Analyte not detected above method detection limits. NR=Analysis for this parameter was not requested. R=Hazardous substance may exhibit the characteristic of reactivity as defined in 40 CFR 261.23. W=Concentrations of trihalomethanes in soil must be added together to determine compliance with the DWPC of 2,000 ug/kg. X=The GSI criterion shown is not protective for surface water that is used as a drinking water source. **- Hazardous substance does not have criteria published in Operational Memorandum No. 18. ND=No laboratory detections.

Where two numbers are present in a cell, the first number is the Target Detection Limit (TDL) and the second number is the risk-based value
Highlighted and shaded values exceed one or more listed Cleanup Criteria.

DRAFT Table 2
Summary of Soil Sample Analysis - SVOCs
6241 Cass Avenue
Detroit, Michigan

	Industrial and Commercial II, III, and IV Criteria																
Chemical	**Groundwater Contact Protection Criteria (µg/kg)**	**Soil Volatilization to Indoor Air Criteria (µg/kg)**	**Infinite Source Volatile Soil Inhalation Criteria (VSIC) (µg/kg)**	**Particulate Soil Inhalation Criteria (µg/kg)**	**Commercial IV Direct Contact Criteria (µg/kg)**	**Soil Saturation Concentration Screening Levels (µg/kg)**	**Dup 1 DP-4 (10-12')**	**DB-5 (2-4')**	**DB-5 (10-12')**	**DB-6 (2-4')**	**DB-6 (10-12')**	**DB-7 (2-4')**	**DB-7 (10-12')**	**DB-8 (2-4')**	**DB-8 (10-12')**	**MDL (µg/kg)**
Date Collected							8/2/2007	8/2/2007	8/2/2007	8/2/2007	8/2/2007	8/2/2007	8/2/2007	8/2/2007	8/2/2007	
PID Reading (ppmv)							0.2	0.3	0.2	0.2	0.1	0.2	0.2	0.1	0.1	
SVOCs (EPA Method 8270)																
Acenaphthene	970,000	350,000,000	97,000,000	6,200,000,000	150,000,000	NA	ND	ND	ND	ND	ND	ND	ND	ND	ND	330
Acenaphthylene	440,000	3,000,000	2,700,000	1,000,000,000	6,100,000	NA	ND	ND	ND	ND	ND	ND	ND	ND	ND	330
Anthracene	41,000	1,000,000,000(D)	1,600,000,000	29,000,000,000	860,000,000	NA	60.2	ND	ND	ND	ND	ND	ND	ND	ND	330
Benz(a)anthracene(Q)	NLL	NLV	NLV	ID	110,000	NA	99	61.7	ND	ND	ND	103	ND	ND	ND	330
Benzo(b)fluoranthene(Q)	NLL	ID	ID	ID	110,000	NA	89.3	73.9	ND	ND	ND	106	ND	ND	ND	330
Benzo(k)fluoranthene(Q)	NLL	NLV	NLV	ID	1,100,000	NA	ND	76.8	ND	ND	ND	ND	ND	ND	ND	330
Benzo(g,h,i)perylene	NLL	NLV	NLV	350,000,000	9,500,000	NA	47.3	ND	ND	ND	ND	ND	ND	ND	ND	330
Benzo(a)pyrene(Q)	NLL	NLV	NLV	1,900,000	11,000	NA	70.9	44	ND	ND	ND	99.8	ND	ND	ND	330
Bis(2-chloroethoxy)methane	**	**	**	**	**	**	NR	NR	NR	NR	NR	NR	NR	NR	NR	330
Bis(2-chloroethyl)ether (I)	110,000	44,000	13,000	12,000,000	68,000	2,200,000	NR	NR	NR	NR	NR	NR	NR	NR	NR	100
Bis(2-chloroisopropyl)ether	**	**	**	**	**	**	NR	NR	NR	NR	NR	NR	NR	NR	NR	330
Bis(2-ethylhexyl)phthalate	NLL	NLV	NLV	890,000,000	10,000,000(C)	10,000,000	NR	NR	NR	NR	NR	NR	NR	NR	NR	330
Butyl benzyl phthalate	310,000(C)	NLV	NLV	21,000,000,000	310,000(C)	310,000	NR	NR	NR	NR	NR	NR	NR	NR	NR	330
2-Chloronaphthalene	**	**	**	**	**	**	NR	NR	NR	NR	NR	NR	NR	NR	NR	330
4-Chloro-3-methylphenol	3,000,000	NLV	NLV	ID	17,000,000	NA	NR	NR	NR	NR	NR	NR	NR	NR	NR	280
2-Chlorophenol	1,900,000	ID	ID	ID	5,300,000	19,000,000	NR	NR	NR	NR	NR	NR	NR	NR	NR	330
4-Chlorophenyl phenyl ether	**	**	**	**	**	**	NR	NR	NR	NR	NR	NR	NR	NR	NR	330
Chrysene (Q)	NLL	ID	ID	ID	11,000,000	NA	70.9	46.9	ND	ND	ND	84.4	ND	ND	ND	330
Dibenzo(a,h)anthracene(Q)	NLL	NLV	NLV	ID	11,000	NA	ND	ND	ND	ND	ND	ND	ND	ND	ND	330
Dibenzofuran	ID	ID	ID	ID	ID	NA	NR	NR	NR	NR	NR	NR	NR	NR	NR	330
Di-n-butyl phthalate	760,000(C)	NLV	NLV	1,500,000,000	760,000(C)	760,000	NR	NR	NR	NR	NR	NR	NR	NR	NR	330
2,4-Dichlorophenol	960,000	NLV	NLV	2,300,000,000	1,800,000(C,DD)	1,800,000	NR	NR	NR	NR	NR	NR	NR	NR	NR	330
Diethyl phthalate	740,000(C)	NLV	NLV	1,500,000,000	740,000(C)	740,000	NR	NR	NR	NR	NR	NR	NR	NR	NR	330
2,4-Dimethylphenol	10,000,000	NLV	NLV	2,100,000,000	43,000,000	NA	NR	NR	NR	NR	NR	NR	NR	NR	NR	330
Dimethyl phthalate	790,000(C)	NLV	NLV	1,500,000,000	790,000(C)	790,000	NR	NR	NR	NR	NR	NR	NR	NR	NR	330
4,6-Dinitro-2-methylphenol	**	**	**	**	**	**	NR	NR	NR	NR	NR	NR	NR	NR	NR	830
2,4-Dinitrophenol	**	**	**	**	**	**	NR	NR	NR	NR	NR	NR	NR	NR	NR	1,700
2,4-Dinitrotoluene	170,000	NLV	NLV	20,000,000	260,000	NA	NR	NR	NR	NR	NR	NR	NR	NR	NR	330
2,6-Dinitrotoluene	**	**	**	**	**	**	NR	NR	NR	NR	NR	NR	NR	NR	NR	330
Di-n-octyl phthalate	140,000,000(C)	NLV	NLV	ID	26,000,000	140,000,000	NR	NR	NR	NR	NR	NR	NR	NR	NR	330
Fluoranthene	730,000	1,000,000,000(D)	890,000,000	4,100,000,000	170,000,000	NA	228	104	ND	ND	ND	149	ND	ND	ND	330
Fluorene	890,000	1,000,000,000(D)	150,000,000	4,100,000,000	100,000,000	NA	35.3	ND	ND	ND	ND	ND	ND	ND	ND	330
Hexachlorobenzene (C-66)	8,200	220,000	56,000	8,500,000	49,000	NA	NR	NR	NR	NR	NR	NR	NR	NR	NR	330
Hexachlorobutadiene (C-46)	350,000(C)	350,000(C)	460,000	180,000,000	350,000(C)	350,000	NR	NR	NR	NR	NR	NR	NR	NR	NR	50
Hexachlorocyclopentadiene (C-56)	720,000(C)	56,000	60,000	5,900,000	720,000(C)	720,000	NR	NR	NR	NR	NR	NR	NR	NR	NR	1,000
Hexachloroethane	110,000	79,000	660,000	100,000,000	860,000	NA	NR	NR	NR	NR	NR	NR	NR	NR	NR	300
Indeno(1,2,3-cd)pyrene(Q)	NLL	NLV	NLV	ID	110,000	NA	33.7	ND	ND	ND	ND	ND	ND	ND	ND	330
Isophorone	2,400,000(C)	NLV	NLV	8,200,000,000	2,400,000(C)	2,400,000	NR	NR	NR	NR	NR	NR	NR	NR	NR	330
2-Methylnaphthalene	5,500,000	ID	ID	ID	31,000,000	NA	ND	ND	ND	ND	ND	ND	ND	ND	ND	330
2-Methylphenol (o-Cresol) (J)	16,000,000	NLV	NLV	2,900,000,000	43,000,000	NA	NR	NR	NR	NR	NR	NR	NR	NR	NR	330
3-Methylphenol (m-Cresol) (J)	16,000,000	NLV	NLV	2,900,000,000	43,000,000	NA	NR	NR	NR	NR	NR	NR	NR	NR	NR	330
4-Methylphenol (p-Cresol) (J)	16,000,000	NLV	NLV	2,900,000,000	43,000,000	NA	NR	NR	NR	NR	NR	NR	NR	NR	NR	330
Naphthalene	2,100,000	470,000	350,000	88,000,000	61,000,000	NA	ND	ND	ND	ND	ND	ND	ND	ND	ND	330
2-Nitroaniline	**	**	**	**	**	**	NR	NR	NR	NR	NR	NR	NR	NR	NR	830
3-Nitroaniline	**	**	**	**	**	**	NR	NR	NR	NR	NR	NR	NR	NR	NR	830
4-Nitroaniline	**	**	**	**	**	**	NR	NR	NR	NR	NR	NR	NR	NR	NR	830
Nitrobenzene (I)	220,000	170,000	64,000	21,000,000	390,000	490,000	NR	NR	NR	NR	NR	NR	NR	NR	NR	50
2-Nitrophenol	1,600,000	NLV	NLV	ID	2,400,000	NA	NR	NR	NR	NR	NR	NR	NR	NR	NR	330
4-Nitrophenol	**	**	**	**	**	**	NR	NR	NR	NR	NR	NR	NR	NR	NR	1,700
N-Nitrosodiphenylamine	700,000	NLV	NLV	ID	9,200,000	NA	NR	NR	NR	NR	NR	NR	NR	NR	NR	330
N-Nitroso-di-n-propylamine	7,200	NLV	NLV	2,000,000	6,400	1,500,000	NR	NR	NR	NR	NR	NR	NR	NR	NR	330
Pentachlorophenol	4,300	NLV	NLV	130,000,000	490,000	NA	NR	NR	NR	NR	NR	NR	NR	NR	NR	20
Phenanthrene	1,100,000	5,100,000	190,000	2,900,000	6,100,000	NA	257	58.1	ND	ND	ND	82.3	ND	ND	ND	330
Phenol	12,000,000(C)	NLV	NLV	18,000,000,000	12,000,000(C,DD)	12,000,000	NR	NR	NR	NR	NR	NR	NR	NR	NR	330
Pyrene	480,000	1,000,000,000(D)	780,000,000	2,900,000,000	110,000,000	NA	208	101	ND	ND	ND	141	ND	ND	ND	330
2,4,5-Trichlorophenol	9,100,000	NLV	NLV	10,000,000,000	86,000,000	NA	NR	NR	NR	NR	NR	NR	NR	NR	NR	330
2,4,6-Trichlorophenol	200,000	NLV	NLV	1,300,000,000	3,900,000	NA	NR	NR	NR	NR	NR	NR	NR	NR	NR	330

DD=Hazardous substance causes developmental effects. Residential and Commercial I DCC are protective of both prenatal and postnatal exposure. IV DCC are protective for an adult pregnant receptor. C=Value presented is a screening level based on the chemical-specific generic soil saturation cc calculated risk-based criterion is greater than Csat. I=Hazardous substance may exhibit the characteristic of ignitability as defined in 40 CFR 261.21. criterion. J=Hazardous substance may be present in several isomer forms. Isomer-specific concentrations must be added together for comparison to below the analytical target detection limit (TDL), therefore, the criterion defaults to the TDL. NA=Criterion or value is not available or, as is the case for not detected above method detection limits. NR=Analysis for this parameter was not requested. R=Hazardous substance may exhibit the characteris 261.23. W=Concentrations of trihalomethanes in soil must be added together to determine compliance with the DWPC of 2,000 ug/kg. X=The GSI crit surface water that is used as a drinking water source. **- Hazardous substance does not have criteria published in Operational Memorandum No. 18.

Where two numbers are present in a cell, the first number is the Target Detection Limit (TDL) and the second number is the risk-based value
Highlighted and shaded values exceed one or more listed Cleanup Criteria.

DRAFT Table 3
Summary of Soil Sample Analysis - Metals and PCBs
6241 Cass Avenue
Detroit, Michigan

			Industrial and Commercial II, III, and IV Criteria																				
Chemical	**Chemical Abstract Service (CAS) Number**	**Statewide Default Background Levels (µg/kg)**	**Groundwater Contact Protection Criteria (µg/kg)**	**Soil Volatilization to Indoor Air Criteria (µg/kg)**	**Infinite Source Volatile Soil Inhalation Criteria (VSIC) (µg/kg)**	**Particulate Soil Inhalation Criteria (µg/kg)**	**Commercial IV Direct Contact Criteria (µg/kg)**	**Soil Saturation Concentration Screening Levels (µg/kg)**	**Most Stringent Criteria (µg/kg)**	**GP-1 (8-10')**	**GP-1 (8-10') Duplicate**	**GP-2 (2-4')**	**GP-3 (2-4)**	**GP-4 (4-6')**	**GP-5 (4-6')**	**TP-1 (West Bottom)**	**TP-1 (West Bottom) Duplicate**	**TP-1 (South Wall)**	**TP-2 (North Wall)**	**TP-2 (South Wall)**	**DB-9 (3-5)**	**DB-10 (2-4)**	**DB-10 (6-8)**
Date Collected										3/6/2007	3/6/2007	3/6/2007	3/6/2007	3/6/2007	3/6/2007	3/7/2007	3/7/2007	3/7/2007	3/7/2007	3/7/2007	8/2/2007	8/2/2007	8/2/2007
PID Reading (ppmv)										11.3	11.3	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0			
METALS (EPA Method 6020)																							
Antimony	7440360	NA	49,000,000	NLV	NLV	5,900,000	700,000	NA	700,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NR	NR	NR
Arsenic	7440382	5,800	2,000,000	NLV	NLV	910,000	41,000	NA	41,000	1,350	1,690	810	1,840	750	1,060	1,350	1,300	420	390	8,900	1,470	2,470	6,600
Beryllium	7440417	NA	1,000,000,000(D)	NLV	NLV	590,000	1,600,000	NA	590,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NR	NR	NR
Cadmium (B)	7440439	1,200	230,000,000	NLV	NLV	2,200,000	2,100,000	NA	2,100,000	ND	ND	ND	360	ND	220	ND	ND	320	ND	480	NR	NR	NR
Chromium (B,H)	18540299	18,000	140,000,000	NLV	NLV	240,000	9,600,000	NA	240,000	4,900	5,500	ND	5,100	6,900	5,000	4,300	5,200	4,800	5,200	6,200	NR	NR	NR
Copper (B)	7440508	32,000	1,000,000,000(D)	NLV	NLV	59,000,000	76,000,000	NA	59,000,000	4,900	5,800	2,400	56,500	5,900	7,500	9,700	5,200	18,100	4,800	41,000	NR	NR	NR
Lead (B) total	7439921	21,000	ID	NLV	NLV	44,000,000	400,000	NA	400,000	4,700	5,600	10,800	109,000	6,600	9,800	4,800	4,200	10,700	9,300	517,000	2,450	2,350	136,000
Mercury (Total) (B,Z)	varies	130	47,000	89,000	62,000	8,800,000	600,000	NA	47,000	ND	ND	ND	62	ND	ND	ND	ND	ND	ND	147	NR	NR	NR
Nickel (B)	7440020	20,000	1,000,000,000(D)	NLV	NLV	16,000,000	150,000,000	NA	16,000,000	6,900	8,200	1,300	7,000	7,200	5,500	6,600	9,000	4,600	5,600	10,500	NR	NR	NR
Selenium (B)	7782492	410	78,000,000	NLV	NLV	59,000,000	10,000,000	NA	10,000,000	640	550	350	500	510	730	470	480	200	ND	760	NR	NR	NR
Silver (B)	7440224	1,000	200,000,000	NLV	NLV	2,900,000	9,400,000	NA	2,900,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NR	NR	NR
Thallium (B)	7440280	NA	15,000,000	NLV	NLV	ID	130,000	NA	130,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	1,740	NR	NR	NR
Zinc (B)	7440666	47,000	1,000,000,000(D)	NLV	NLV	ID	660,000,000	NA	660,000,000	18,000	18,600	4,800	78,400	20,100	38,000	18,200	17,300	20,200	31,800	195,000	NR	NR	NR
Polychlorinated Biphenyls (PCBs) (EPA Method 8082)																							
PCBs (J,T)	1336363	NA	NLL	16,000,000	810,000	6,500,000	(T)	NA	810,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NR	NR	NR

B=Background, as defined in Rule 299.5701(c), may be substituted if higher than the calculated cleanup criteria. D=Calculated criterion exceeds 100%; hence, it is reduced to 100% (i.e., 1.0E+9 ppb). G=GSI criterion is pH or water hardness dependent. H=Valence-specific chromium data (Cr III and Cr VI) must be compared to the corresponding valence-specific cleanup criteria. If analytical data are provided for "total" chromium only, then values for Cr VI must be applied as the cleanup criteria. NA=Criterion or value is not available or, as is the case for Csat, not applicable. ND=Analyte not detected above method detection limits. NLV=Hazardous substance is not likely to volatilize under most conditions. developed using "relative potential potencies" (RPPs) to benzo(a)pyrene. S= Criterion defaults to the hazardous substance-specific water solubility limit. X=The GSI criterion shown is not protective for surface water that is used as a drinking water source.

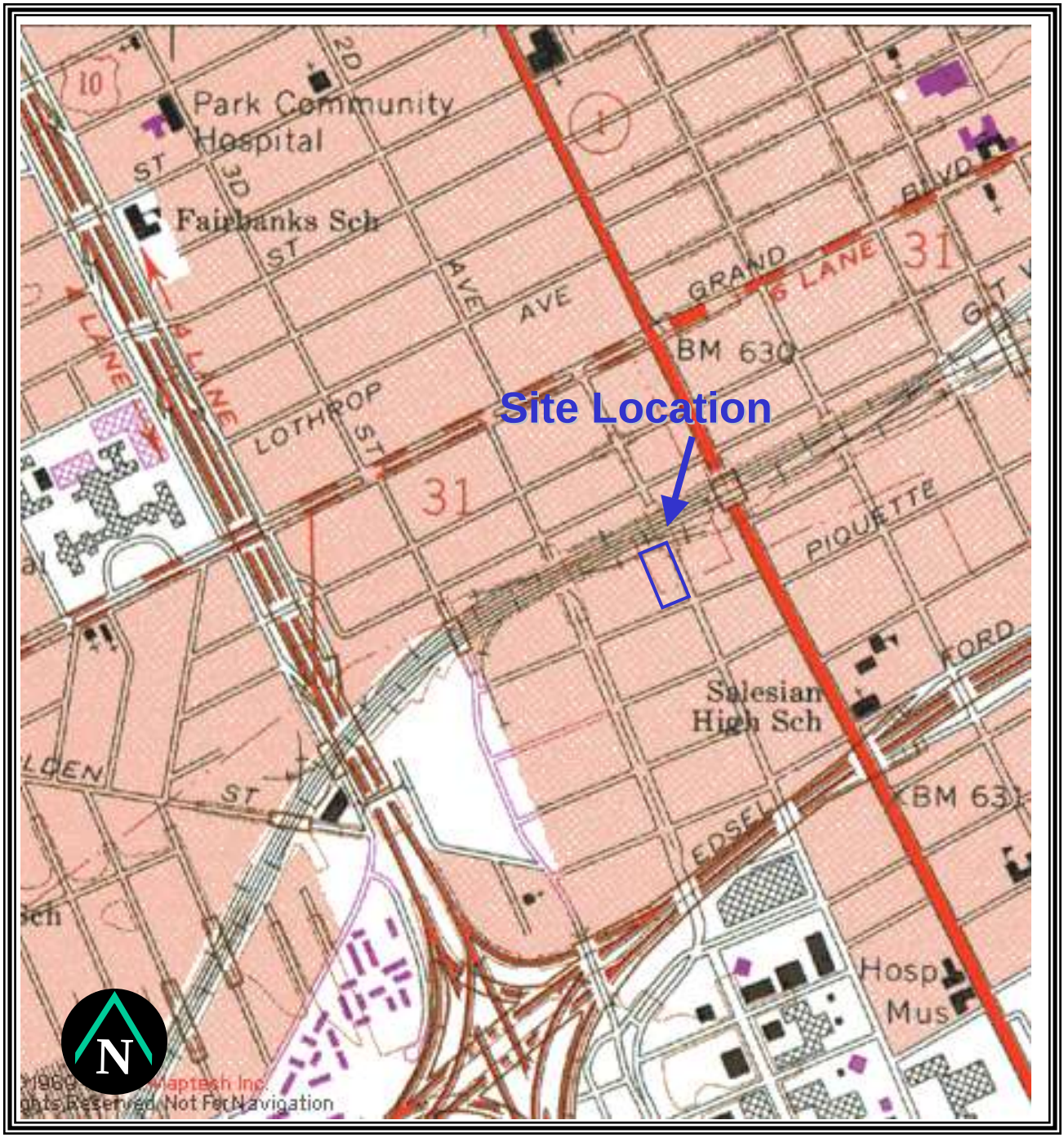
Where two numbers are present in a cell, the first number is the Target Detection Limit (TDL) and the second number is the risk-based value
Highlighted and shaded values exceed one or more listed Cleanup Criteria.

DRAFT Table 3
Summary of Soil Sample Analysis - Metals and PCBs
6241 Cass Avenue
Detroit, Michigan

			Industrial and Commercial II, III, and IV Criteria										
Chemical	**Chemical Abstract Service (CAS) Number**	**Statewide Default Background Levels (µg/kg)**	**Groundwater Contact Protection Criteria (µg/kg)**	**Soil Volatilization to Indoor Air Criteria (µg/kg)**	**Infinite Source Volatile Soil Inhalation Criteria (VSIC) (µg/kg)**	**Particulate Soil Inhalation Criteria (µg/kg)**	**Commercial IV Direct Contact Criteria (µg/kg)**	**Soil Saturation Concentration Screening Levels (µg/kg)**	**Most Stringent Criteria (µg/kg)**	**DB-11 (2-4)**	**DB-11 (10-12)**	**Dup 2 DP-11 (10-12)**	**MDL (µg/kg)**
Date Collected										8/2/2007	8/2/2007	8/2/2007	
PID Reading (ppmv)													
METALS (EPA Method 6020)													
Antimony	7440360	NA	49,000,000	NLV	NLV	5,900,000	700,000	NA	700,000	NR	NR	NR	1000
Arsenic	7440382	5,800	2,000,000	NLV	NLV	910,000	41,000	NA	41,000	5,580	5,110	5,950	2,000
Beryllium	7440417	NA	1,000,000,000(D)	NLV	NLV	590,000	1,600,000	NA	590,000	NR	NR	NR	500
Cadmium (B)	7440439	1,200	230,000,000	NLV	NLV	2,200,000	2,100,000	NA	2,100,000	NR	NR	NR	200
Chromium (B,H)	18540299	18,000	140,000,000	NLV	NLV	240,000	9,600,000	NA	240,000	NR	NR	NR	2,000
Copper (B)	7440508	32,000	1,000,000,000(D)	NLV	NLV	59,000,000	76,000,000	NA	59,000,000	NR	NR	NR	1,000
Lead (B) total	7439921	21,000	ID	NLV	NLV	44,000,000	400,000	NA	400,000	31,300	7,980	47,100	10,000
Mercury (Total) (B,Z)	varies	130	47,000	89,000	62,000	8,800,000	600,000	NA	47,000	NR	NR	NR	50
Nickel (B)	7440020	20,000	1,000,000,000(D)	NLV	NLV	16,000,000	150,000,000	NA	16,000,000	NR	NR	NR	1,000
Selenium (B)	7782492	410	78,000,000	NLV	NLV	59,000,000	10,000,000	NA	10,000,000	NR	NR	NR	200
Silver (B)	7440224	1,000	200,000,000	NLV	NLV	2,900,000	9,400,000	NA	2,900,000	NR	NR	NR	100
Thallium (B)	7440280	NA	15,000,000	NLV	NLV	ID	130,000	NA	130,000	NR	NR	NR	500
Zinc (B)	7440666	47,000	1,000,000,000(D)	NLV	NLV	ID	660,000,000	NA	660,000,000	NR	NR	NR	1,000
Polychlorinated Biphenyls (PCBs) (EPA Method 8082)													
PCBs (J,T)	1336363	NA	NLL	16,000,000	810,000	6,500,000	(T)	NA	810,000	NR	NR	NR	330

B=Background, as defined in Rule 299.5701(c), may be substituted if higher than the calculated cleanup criteria. D=Calculated criterion exceeds 100%; hence, it is reduced to 100% (i.e., 1. hardness dependent. H=Valence-specific chromium data (Cr III and Cr VI) must be compared to the corresponding valence-specific cleanup criteria. If analytical data are provided for "total" applied as the cleanup criteria. NA=Criterion or value is not available or, as is the case for Csat, not applicable. ND=Analyte not detected above method detection limits. NLV=Hazardous s conditions. developed using "relative potential potencies" (RPPs) to benzo(a)pyrene. S= Criterion defaults to the hazardous substance-specific water solubility limit. X=The GSI criterion sh used as a drinking water source.

Where two numbers are present in a cell, the first number is the Target Detection Limit (TDL) and the second number is the risk-based value
Highlighted and shaded values exceed one or more listed Cleanup Criteria.



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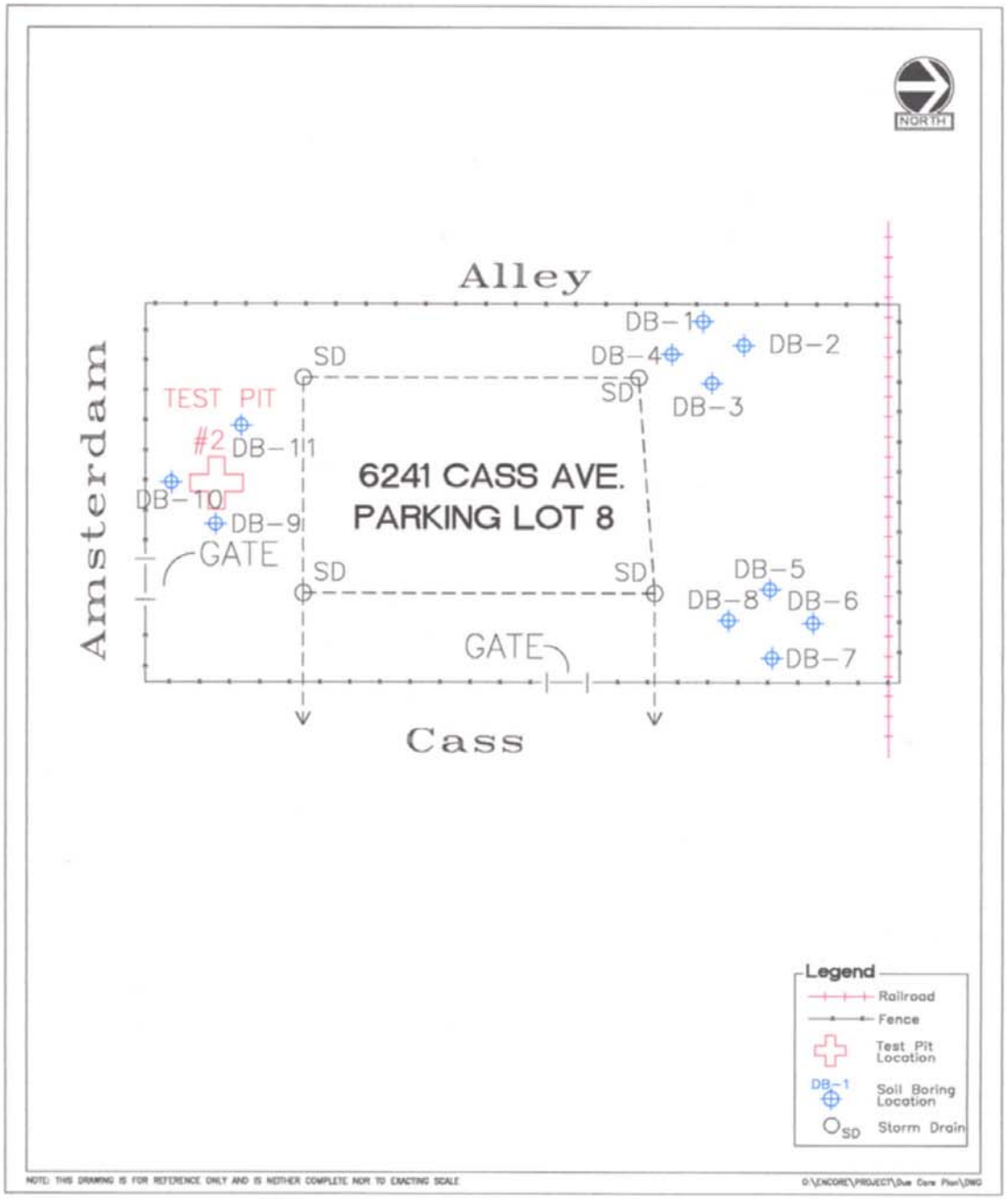
Taken from the 1968, Detroit, Michigan 7.5 Series U.S.G.S. Topographic Quadrangle, photorevised 1973 and 1980

THE TRAVERSE GROUP

FIGURE 1
SITE LOCATION AND TOPOGRAPHIC MAP
PARKING LOT 8
6241 CASS AVENUE
DETROIT, MICHIGAN



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RM073499 REV: 10/03/07 JB CHKD: DH

FIGURE 2
SOIL BORING AND SOIL SAMPLING LOCATIONS
PARKING LOT 8 - 6241 CASS AVENUE
DETROIT, MICHIGAN

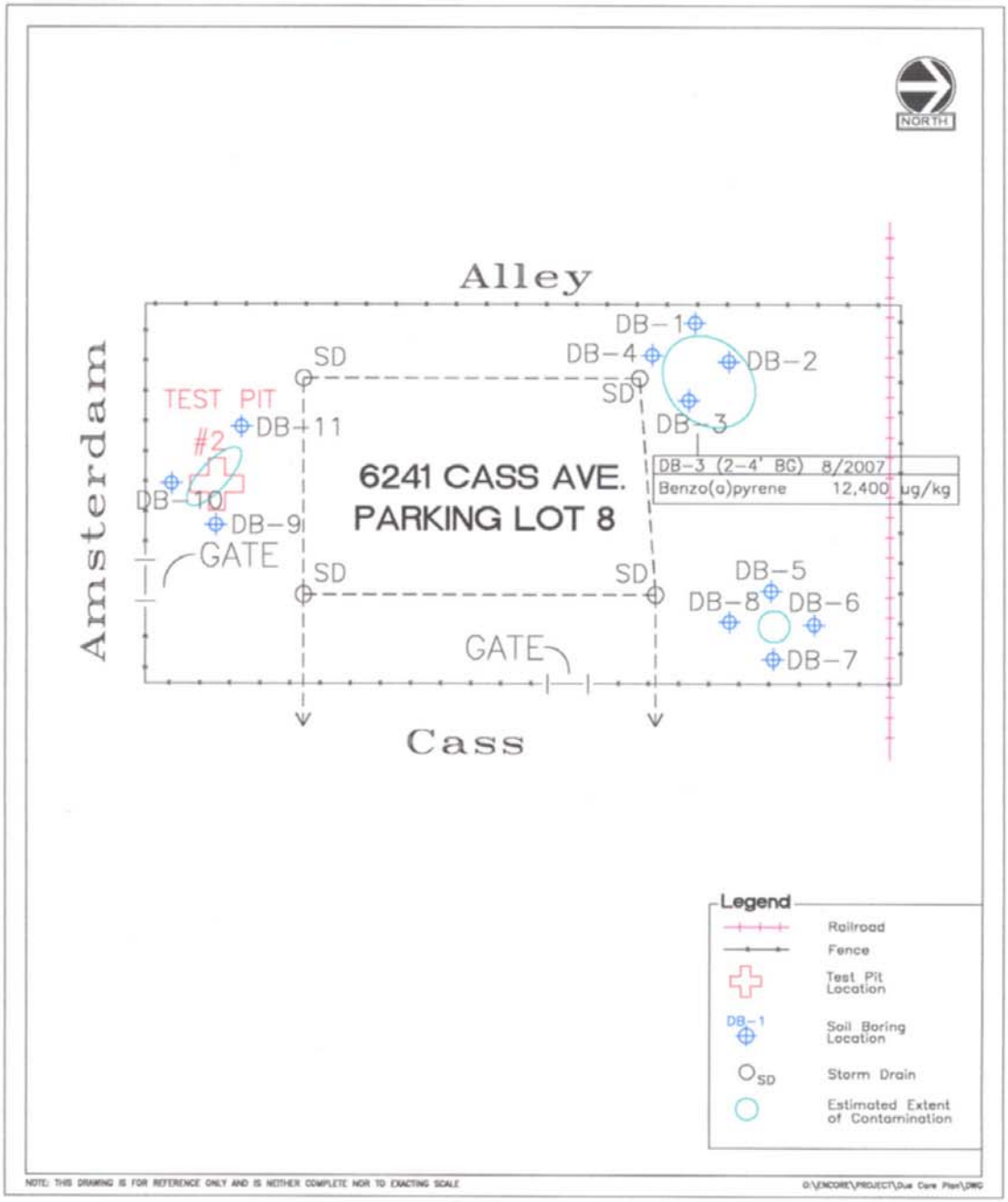

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FIGURE 3
SOIL SAMPLING LOCATIONS WITH
CONCENTRATIONS EXCEEDING COMMERCIAL IV CRITERIA
PARKING LOT 8 - 6241 CASS AVENUE
DETROIT, MICHIGAN