



REMOVAL ACTION CONSTRUCTION REPORT TEXTILE ROAD SITE WASHTENAW COUNTY, MICHIGAN

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LIST OF ACRONYMS/SHORT FORMS

AI	- Additional Investigation
Altech	- Altech Services L.L.C.
AOC	- Administrative Order by Consent
bgs	- below ground surface
Carleton Farms	- Carleton Farms Landfill
CET	- Carlo Environmental Technologies, Inc.
COCs	- Contaminants of Concern
CRA	- Conestoga-Rovers & Associates
cu. yds.	- cubic yards
DOT	- Department of Transport
E&E	- Ecology and Environment, Inc.
EA	- Excavation Area
EECA	- Engineering Evaluation and Cost Analysis
EOC	- Extent of Contamination
EQ	- The Environmental Quality Company
Ford	- Ford Motor Company
Group	- collectively REALM and H&S and any additional parties to Co-operating Parties Group
H&S	- Holtzman and Silverman Realty Company
HASP	- Health and Safety Plan
MDEQ	- Michigan Department of Environmental Quality
MDNR	- Michigan Department of Natural Resources
NOVA	- Nova Consultants Inc.
OSC	- On-Scene Coordinator
OSHA	- Occupational Safety & Health Administration
PCBs	- Polychlorinated Biphenyls
PID	- Photoionization Detector
QAPP	- Quality Assurance Project Plan
Quanterra	- Quanterra Incorporated
RA	- Removal Action
REALM	- Remediation and Liability Management Company, Inc.
Report	- Removal Action Construction Report
SAP	- Sampling and Analysis Plan
Site	- Textile Road Site
SOW	- Scope of Work
SPL	- Southern Petroleum Laboratories
SVOCs	- Semi-Volatile Organic Compounds

LIST OF ACRONYMS/SHORT FORMS

SWQD	- Surface Water Quality Division
TSCA	- Toxic Substances Control Act
U.S. EPA	- United States Environmental Protection Agency
VOCs	- Volatile Organic Compounds
VSR	- Verification of Soil Remediation
WD	- Wayne Disposal, Inc.
Work Plan	- Removal Action Work Plan dated August 5, 1999
Ypsilanti Township	- Charter Township of Ypsilanti

1.0 INTRODUCTION

1.1 GENERAL

This document presents the Removal Action Construction Report (Report) for the implementation of the United States Environmental Protection Agency (U.S. EPA) approved Removal Action Work Plan dated August 5, 1999, as amended August 17, 1999 (Work Plan), for the Textile Road Site located in Ypsilanti Township, Washtenaw County, Michigan (Site). This Report has been prepared by Conestoga-Rovers & Associates, Inc. (CRA) on behalf of the Remediation and Liability Management Company Inc. (REALM), a wholly owned Subsidiary of General Motors Corporation, and the Holtzman and Silverman Realty Company (H&S) [collectively REALM and H&S, and any additional parties are referred to as the Cooperating Parties Group (Group)] and is being submitted in accordance with Section V, Paragraph 2.6 of the Administrative Order by Consent (AOC) for the Site (Docket No. V-W-'99-C-562). The AOC was entered into between and by the Group and the U.S. EPA and became effective of September 23, 1999.

This Report certifies the completion of the Removal Action (RA) activities in accordance with the approved Work Plan. The Work Plan implementation was conducted during the period of October 19, 1999 to June 26, 2000. The Work Plan implementation involved the excavation and disposal of soil material containing polychlorinated biphenyls (PCBs) and other hazardous substances from five areas of the Site, the disposal of the material at appropriately permitted facilities, backfilling of the excavations, grading the Site for proper drainage, and the installation of groundwater monitoring wells to monitor the long term effectiveness of the RA.

The Site location is presented on Figure 1.1. The general layout of the Site showing the conditions prior to initiation of the RA activities is presented on Figure 1.2.

1.2 PROJECT BACKGROUND

The Site is an inactive industrial property located to the southeast of the corner of Textile Road and Bunton Road in Ypsilanti Township, Washtenaw County, Michigan. The Site is bounded to the north by Textile Road, to the west by Bunton Road, to the east by a Ford Motor Company (Ford) manufacturing plant and to the south by an agricultural property. The Site was used for agricultural purposes until the late 1940's when gravel extraction and operations were initiated. The gravel extraction and filling operations ceased in 1973. In 1983, attention was drawn to the Site when a local resident notified

the Michigan Department of Natural Resources (MDNR) of the presence of 55-gallon drums. The drums were removed and a number of environmental investigations were completed. The Site background is summarized in further detail in the report entitled "Summary of Prior Site investigations and Identification of Data Gaps Report" (CRA, 1992).

An Extent of Contamination Study (EOC) (CRA 1994a), and an Engineering Evaluation and Cost Analysis (EECA) (CRA 1994b) were conducted at the Site. An Additional Investigative (AI) Study (CRA 1995) was conducted by CRA to provide supplemental information to the EOC/EECA Reports. An addendum to the EECA report was prepared in February 1996 presenting a re-evaluation of the on-Site disposal cell and off-Site disposal RA alternatives for the Site. Based on the findings from the latter report, which provided a detailed estimate of soil volume with respective levels of PCB contamination, CRA prepared the Work Plan for remediation of the Site.

The objective of the RA was to excavate and remove soil containing hazardous substances which exceed the established cleanup criteria from the property for disposal at appropriately permitted landfills. For areas of the Site which are zoned for residential and commercial use (approximate 50 acres and 12 acres, respectively), the objective was to achieve the equivalent of an Act 451, Part 201 generic cleanup. Figure 1.3 illustrates the current zoning of the Site. To ensure the long term effectiveness of the removal action a groundwater monitoring program will be implemented.

1.3 PRE REMOVAL ACTION SITE DESCRIPTION

A complete description of the Site conditions, environmental setting, and characterization prior to initiating the RA activities can be found in Section 1.0 and Section 2.0 of the Work Plan. The Site is generally flat with occasional fill mounds located across the Site. Three man-made ponds are located on the Site as shown on Figure 1.2. The surface materials at the Site consist of various amounts of earth fill, building rubble, and native soils.

The Site geology consists of 15 to 22 feet of surficial sand or fill material which consists of mixed sands, gravels, clays, and fill. A glacial clay unit exists immediately below the fill material in the area and is continuous across the Site and the region surrounding the Site. The thickness of the clay ranges from approximately 14 to 18 feet. The clay is underlain by a lower sands unit which consists of glacially derived sand, gravel, and silt and extends from 30 to 130 feet below ground surface (bgs). Antrim shale bedrock has been encountered below the lower sands unit.

In general, the Site consists of an upper water table zone, clay aquitard, lower sands aquifer, and bedrock shale aquitard. The groundwater elevation contours for the upper water table zone indicate a general groundwater flow direction of northwest and is expected to ultimately discharge to Ford Lake. The lower sands aquifer flows north with a slight eastward component. The clay aquitard is a low permeability unit which hydraulically separates the upper water table zone from the lower sands aquifer.

Investigations have been conducted at the Site to characterize the extent of contamination at the Site. During the EOC and AI studies, numerous soil borings, monitoring wells, surface water samples, and sediment samples were installed or collected to characterize the Site. The samples were analyzed for various chemicals including volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), PCBs, pesticides, and inorganics. Comprehensive data reviews are provided in the EOC and AI documents. Based on the results of the sampling, a list of contaminants of concern (COCs) was developed. The sample results from the EOC and the list of COCs are summarized in Table 1.1 for the upper sand/fill unit and in Table 1.2 for the upper water table zone.

1.4 SITE ZONING

Prior to initiating the RA, the Group entered into a Consent Judgement with Ypsilanti Township to modify the zoning to be consistent with the objectives of the RA and to support future Site re-development (see Figure 1.3). The Consent Judgement was filed in the Grant Court for the County of Washtenaw on October 27, 1999. A copy of the Consent Judgement is presented in Appendix A. Following the completion of the RA, the zoning boundary was surveyed to obtain the new legal description of the property. A copy of the legal survey is provided with the Consent Judgement in Appendix A. The legal description for the two parcels on the Site (Parcel A, B-1 Local Business and Parcel B, R-4 Residential) are as follows:

Parcel A Legal Description (North of Ponds - Local Business) (see Figure 1.3)

A Parcel being part of the NW 1/4 of Section 25, Town 3 South, Range 7 East, Ypsilanti Township, Washtenaw County, Michigan.

More Particularly Described as: Beginning at the NW corner (P.O.B.) of said Section 25, Thence N 86° 48' 41" E, along the North Section Line, 1019.04', Thence S 01° 21' 55" E 513.16', Thence S 70° 21' 56" W 353.28', Thence N 71° 26' 46" W 409.29', Thence

N 11° 06' 21 " W 121.15', Thence S 72° 03' 30" W 143.55', Thence S 86° 48' 41" W, Parallel to the North Section Line, 140.26' to a point on the West Line of said Section, Thence N 01° 21' 40" W, along the West Section Line, 378.06 to the NW corner (P.O.B.) of said Section 25', Said parcel containing 11.63 acres of land, more or less, Subject to easements and restrictions of record, if any.

Parcel B Legal Description (Residential Area) (see Figure 1.3)

A Parcel being part of the NW 1/4 of Section 25, Town 3 South, Range 7 East, Ypsilanti Township, Washtenaw County, Michigan.

More Particularly Described as: Commencing at the NW corner of said Section 25, Thence N 86° 48' 41" E, along the North Section Line, 1019.04', Thence S 01° 21' 55" E 513.16' to the Point of Beginning (P.O.B.), Thence S 01° 21' 55" E 2123.24', Thence S 87° 10' 08" W 1019.04' to a point on the East-West 1/4 Line of said Section (As Monumented), Thence N 01° 21' 40" W, along the West Section Line, 2251.99', Thence N 86° 48' 41" E, Parallel to the North Section Line, 140.26', Thence N 72° 03' 30" E 143.55', Thence S 11° 06' 21" E 121.15', Thence S 71° 26' 46" E 409.29', Thence N 70° 21' 56" E 353.28' to the Point of Beginning (P.O.B.), Said parcel containing 49.95 acres of land, more or less, Subject to easements and restrictions of record, if any.

1.5 CLEANUP OBJECTIVES

Cleanup objectives for the Site were established in the Work Plan based on Michigan Act 451, Part 201 Generic Residential and Commercial Category IV cleanup criteria. The cleanup objectives for PCBs was to remove PCB containing soil from residential areas to below 1.2 mg/kg (Michigan Act 451, Part 201 Generic Residential Soil Direct Contact Criteria) and to remove PCB containing soil from commercial areas to below 26 mg/kg (Michigan Act 451, Part 201 Generic Commercial Category IV Soil Direct Contact Criteria). It should be noted that the Michigan Act 451, Part 201 Generic Soil Direct Contact Criteria were revised in June 2000 to reflect changes made by the Michigan Department of Environmental Quality (MDEQ) in the risk based assumptions used to develop these criteria. The current PCB cleanup criteria under Michigan Act 451, Part 201 are 4.0 mg/kg for Generic Residential Soil Direct Contact and 32.0 mg/kg for Generic Commercial Category IV Soil Direct Contact.

In addition, the Work Plan required removal of soil material to below the Michigan Act 451, Part 201 Residential and Commercial criteria for vinyl chloride and phenanthrene. Therefore, following removal of PCB material to the appropriate cleanup

objectives and verification sampling, soil samples were collected from each excavation area to ensure cleanup had occurred to the vinyl chloride and phenanthrene criteria. The cleanup objective for vinyl chloride and phenanthrene were based on the Michigan Act 451, Part 201 Groundwater Surface Water Interface Criteria of 300 µg/kg for vinyl chloride and 2,300 µg/kg for phenanthrene.

1.6 REPORT ORGANIZATION

This Report is organized in the following sections:

- i) Section 1.0 presents the Site location and background, and the organization of the Report;
- ii) Section 2.0 presents a summary of the Scope of Work (SOW) for the Work Plan implementation;
- iii) Section 3.0 presents details of on-Site project management including implementation personnel, contractor and subcontractors, and Site security;
- iv) Section 4.0 presents details of the RA Site activities, including excavation, disposal, and backfilling;
- v) Section 5.0 summarizes the verification sampling and analysis which was conducted to ensure the objectives of the RA were met;
- vi) Section 6.0 provides a list of references; and
- vii) Section 7.0 provides conclusions and certification of the Work Plan implementation.

This Report includes the following appendices:

- Appendix A Property Zoning Consent Judgement
- Appendix B Removal Action Photographic Log
- Appendix C Soil Erosion Control and Earth Balancing Plan
- Appendix D Carleton Farms Disposal Documentation
- Appendix E Wayne Disposal, Inc. Manifests
- Appendix F PCB Liquid Disposal Documentation
- Appendix G Wastewater Treatment Facility Effluent Sample Results
- Appendix H June 9, 2000 Letter to Mr. P.C. Lall Regarding Final Closeout Activities
- Appendix I Groundwater Monitoring Wells Boring Logs
- Appendix J Summary of PCB Verification Sample Results

Appendix K	Verification Sample QA/QC Validation Memorandum
Appendix L	Surface Water And Excavation Water Analytical Results

2.0 SCOPE OF WORK

This Section provides a summary of the RA activities that were conducted at the Site consistent with the Work Plan. Specific activities conducted to complete the Work Plan included the following:

- development and implementation of a Site-specific Health and Safety and Contingency and Emergency Response Plan;
- mobilization of construction facilities, material, equipment, and personnel necessary to perform the work;
- provision and maintenance of construction facilities and temporary controls;
- Site preparation including:
 - work zone identification,
 - the provision of utilities,
 - construction of an earthen berm to stabilize the north shoreline of Pond No. 1,
 - construction of staging facilities,
 - construction of access roads, and
 - clearing and grubbing of existing vegetation;
- provision of Site security;
- implementation of environmental controls;
- survey and layout of soil excavations areas;
- excavation of contaminated soil;
- staging/characterization of contaminated soil;
- verification of soil cleanup levels;
- backfilling/grading of excavated areas with appropriate material;
- transportation and disposal of waste material at appropriate disposal facilities in accordance with State and Federal regulations;
- placement of a material cover in areas of the Site zoned commercial at the time of the RA implementation which continue to contain material above Michigan Act 451, Part 201 Residential Cleanup Criteria and below Michigan Act 451, Part 201 Commercial Cleanup Criteria (consistent with Site zoning);
- removal of miscellaneous debris and disposal at appropriate off-Site facilities; and
- RA closeout activities including:
 - surficial cleanup of tracked areas,

- on-Site restoration,
- decontamination of Site equipment and facilities,
- management of wastewaters, and
- demobilization of construction facilities and equipment from the Site.

The RA sampling and analysis activities were conducted in accordance with the Sampling and Analysis Plan (SAP) and Quality Assurance Project Plan (QAPP) included as appendices to the Work Plan. RA activities were also conducted in accordance with the Site Health and Safety Plan (HASP) and Project Specifications also included as appendices to the Work Plan.

Figure 2.1 presents a general Site layout of construction facilities utilized during implementation of the RA. Table 2.1 presents a summary of the major activities conducted to fulfill the requirements of the Work Plan. The specific Work Plan implementation activities are discussed in Sections 4.0 and 5.0. A photographic log of the Work Plan implementation is provided in Appendix B.

All work activities completed during the Work Plan implementation were conducted at the Site in a manner designed to maintain the integrity of existing structures and equipment, and minimize the risk of potential impact to human health, welfare, and the environment.

3.0 PROJECT MANAGEMENT

3.1 GENERAL

Figure 3.1 summarizes project organizational chart and key personnel on Site during implementation of the Work Plan.

3.2 WORK PLAN CERTIFICATION AND OVERSIGHT

CRA of Romulus, Michigan was retained by the Group to provide construction contract administration and third party certification to ensure that soil excavation, removal and disposal activities were conducted at the Site in accordance with the Work Plan. CRA's responsibilities as Engineer included coordination of project with direction from the Group, providing management and administration services during the implementation of RA, management of the procurement of all contractors including the Removal Action Contractor, subcontractor analytical laboratories, and surveyor/sampling subcontractor.

U.S. EPA oversight of the Work Plan implementation was provided by the U.S. EPA On-Scene Coordinator (OSC). Daily oversight was provided for U.S. EPA by representatives from Ecology and Environment, Inc. (E&E).

3.3 CONTRACTOR / SUBCONTRACTORS

The contractor retained by Group to implement the Work Plan was Carlo Environmental Technologies Inc. (CET) of Clinton Township, Michigan. CET completed the work activities for the Work Plan between October 19, 1999 and June 26, 2000.

CET retained the following subcontractors and suppliers to complete the Work Plan activities:

- AON Risk Services of Michigan;
- Jackie's Transport, Inc.;
- Brighton Analytical, Inc.;
- Consumer Supply, Inc.;
- Detroit Edison;
- GE Capital Modular Space;
- Michigan Barricading;

- A.F. Smith Electric;
- Autumn Industrial, Inc.;
- Carleton Farms Landfill;
- Calcaterra & Associates;
- Dart Trucking Company, Inc.;
- Pro Act;
- Harry Fox;
- London Aggregates;
- Atwell Hicks; and
- Will's Trucking, Inc.

CRA retained the following subcontractors during the implementation of the Work Plan:

- Southern Petroleum Laboratories (SPL) from Holly Springs, North Carolina provided laboratory services;
- Quanterra Incorporated (Quanterra), from North Canton, Ohio provided laboratory services for air characterization and groundwater/surface water purposes;
- NOVA Consultants Inc. (NOVA) of Novi, Michigan provided the soil and surface water sample collection and surveying services; and
- Altech Services L.L.C. (Altech) of Southfield, Michigan for drilling and well abandonment services.

3.4 PROJECT DOCUMENTATION AND MONITORING

CRA maintained a daily Site logbook for documentation of all activities that occurred at the Site. Other records which were maintained on Site on a daily basis included weather conditions, on-Site personnel, visitors, work activities conducted, air monitoring, disposal details, and disposal manifests.

3.5 SITE SECURITY

Throughout the Work Plan implementation, CET maintained Site security by conducting security inspections of the perimeter security fence on a biweekly basis and by maintaining a log of individuals entering and exiting the Site. During periods of

inactivity at the Site, the area remained gated and locked. A sign was placed at the main entrance to the Site indicating the nature of the Site activities and U.S. EPA contact numbers.

In general, no significant security issues arose during the RA implementation. Only minor repairs to seven locations of the perimeter security fence were required in early November 1999 after mobilization to the Site. Thereafter, no additional breakage of the security fencing was observed for the remainder of the RA.

4.0 REMOVAL ACTION ACTIVITIES

4.1 SITE PREPARATION

Site preparation work began on October 19, 1999 with the pre-mobilization meeting between the Group, CRA, and CET. CET began mobilization activities to the Site on October 22, 1999. Following surveying of the excavation areas and borrow area, clearing and grubbing activities were initiated. Trees and brush cleared from the Site was chipped and staged on-Site for future use during the construction activities. Stumps removed from areas which contained PCB contamination at levels above 26 mg/kg were left in place for off-Site disposal during excavation activities. Stumps removed from other areas of the Site were chipped and staged on-Site. Figure 4.1 presents a layout of the areas from which material was removed during the RA.

Additional Site preparation activities, including installation of the access roads, mobilization and setup of Site trailers, construction of the soil staging facility and wastewater treatment facility, and set up of the equipment and personnel decontamination facilities. The installation of construction facilities was completed by CET on November 17, 1999. The layout of the Site construction facilities is presented on Figure 2.1.

Prior to mobilizing to the Site and during mobilization activities, CET was required by the Project Specifications, Appendix D to the Work Plan, to obtain permits and submit various project plans outlining the procedures to be used during the removal action. The following work plans, provided in Appendix C, were submitted by CET and approved by CRA:

- Site Health and Safety and Emergency Response Plan;
- Soil Erosion and Earth Balancing Plan (and associated permit);
- Soil Excavation and Handling Plan; and
- Wastewater Management Plan.

4.2 SITE CONTROLS

As specified in Section 3.7 of the Work Plan, CET maintained environmental controls including fugitive particulate control, erosion control, and stormwater control at the Site throughout the duration of the project.

Prior to initiating excavation activities, CET submitted a Soil Excavation and Handling Plan outlining the fugitive particulate control measures to minimize the emissions of particulate matter less than 10 microns (PM₁₀) in size which are likely to remain airborne and be carried off Site. The Soil Excavation and Handling Plan was reviewed and approved by CRA.

To stabilize the north shore of Pond No. 1 and to prevent infiltration of surface water into Site excavations, a surface water control berm was constructed along the north end of Pond No. 1. The material for this berm was excavated from the on-Site borrow area and consisted of sandy gravel material. The berm was approximately 50 feet in width from the shoreline and was constructed of approximately 3,200 cubic yards (cu. yd.) of borrow area material. As specified in CET's Soil Excavation and Handling Plan and required by State of Michigan regulations, CET conducted weekly inspections of the erosion control systems, including the berm, and conducted repairs as necessary.

In addition to the Site controls, CET applied to the Charter Township of Ypsilanti (Ypsilanti Township) for a Soil Erosion Control and Earth Balancing Plan which was reviewed and approved on November 29, 1999. The resulting permit was displayed at the Site throughout the duration of the project. A copy of the Soil Erosion Control and Earth Balancing Plan and associated permit is provided in Appendix C.

4.3 HEALTH AND SAFETY AND EMERGENCY RESPONSE

In addition to the Site specific HASP prepared by CRA and submitted as an appendix to the Work Plan, CET developed, implemented, and maintained a Site-specific Health and Safety and Contingency and Emergency Response Plan for the RA construction activities. CET incorporated the on-Site contingency and emergency response plan into the Site specific HASP. The HASP was developed by CET and reviewed and approved by CRA. A copy of the approved HASP was maintained by CET at the Site throughout the duration of the project.

As part of the monitoring activities, CET conducted air monitoring for fugitive emissions during excavation activities. Organic vapor was monitored using a photoionization detector (PID) while particulate levels were monitored using a real-time particulate monitor. In addition to the monitoring conducted by CET, CRA conducted organic vapor and particulate monitoring to confirm the results of CET's monitoring. Prior to initiating any excavation activities, three days of background readings for organic vapor and particulate material were conducted by both CET and CRA. Monitoring of organic vapor and particulate levels was continued throughout the

duration of excavation activities. Monitoring for organic vapor and particulate levels was conducted two times per day at one upwind and two downwind locations during excavating and backfilling activities. The results of the organic vapor and particulate monitoring are summarized in Table 4.1. No exceedances of the organic vapor or particulate action levels occurred during the project, and therefore control measures were not required.

During excavation of material containing PCBs at concentrations of 50 mg/kg or greater, CRA conducted PCB air sampling as required by the Work Plan. PCB air samples were collected continuously for 24-hour periods three days prior to initiating excavation activities and for a total of nine days during excavation at the locations shown on Figure 4.2. Following the nine days of PCB air monitoring, no detections of PCBs in the air samples occurred above the Site action levels and the PCB air monitoring was discontinued in accordance with the Work Plan. The weather conditions during the PCB air monitoring are summarized in Table 4.2. The results of the PCB air monitoring are summarized in Table 4.3. The organic vapor, particulate, and PCB air monitoring was conducted in accordance with the air monitoring protocols outlined in Section 19.0 of the Site Health and Safety Plan, Appendix C of the Work Plan, and the sampling procedures and protocols provide in the Sampling and Analysis Plan and Quality Assurance Project Plan, Appendix A and Appendix B, respectively, of the Work Plan.

In addition to the Occupational Safety & Health Administration (OSHA) requirements outlined in the HASP, CET conducted daily health and safety meetings on-Site and conducted weekly health and safety refresher meetings to discuss issues related to the work. No reportable health and safety issues were identified during the implementation of the Work Plan.

4.4 SOIL EXCAVATION, BACKFILLING, AND FINAL GRADING

The Work Plan delineated five separate areas of contamination based on sampling conducted during the EOC and AI. The boundaries of these five areas were established based on the data collected in the EOC and AI and were developed to be conservative in order to avoid inadvertently leaving contamination in place. The approximate field boundaries of the five areas was surveyed by CET prior to initiating the excavations. In general, soil excavation proceeded from areas with the highest concentrations of PCBs to areas with lower levels of PCBs to avoid cross contamination. However, in some instances this procedure was not practical due to access restrictions or equipment availability. For example, along the southern boundary of Excavation Area (EA) 4 material containing PCBs at concentrations of 26 mg/kg to 50 mg/kg [i.e., material not

regulated by the Toxic Substances Control Act (non-TSCA material)] was removed first because this area would only have been accessible from within the excavation once the material containing 50 mg/kg or greater of PCBs was removed.

The actual excavations were generally somewhat smaller laterally than those estimated in the Work Plan because of the conservative assumptions used in estimating the limits. The actual limits of each excavation area were based upon actual confirmation samples and are presented on Figure 4.1. In some cases, the excavation areas were divided into smaller areas based on the material encountered once excavation had begun, as discussed below.

Table 4.4 presents specific progress and sequencing of the soil excavation, backfilling and removal activities. Excavation activities began on November 19, 1999. Excavation and off-Site disposal of soil containing PCBs was completed on February 15, 2000. The total excavation volumes from each excavation area are summarized in Table 4.5. Soil removal was initiated in EA4 because it contained some of the most highly contaminated material. Following removal of a strip of non-TSCA regulated material from EA4, excavation in EA1 was conducted while final approvals for TSCA disposal were obtained. Once TSCA approval to dispose of material at the Wayne Disposal, Inc. (WD) landfill was obtained, TSCA regulated material was excavated from EA4. Following excavation in EA4, excavation was initiated in EA3 followed by EA2. The final excavation area, EA5, was excavated last as it contained the lowest concentrations of PCB material.

The soil excavation, backfilling, and final grading activities were conducted in accordance with the Project Specifications, Appendix D of the Work Plan. The following subsections provide a more detailed description of the excavation activities in each area and any difficulties encountered.

4.4.1 EXCAVATION AREA 1

Excavation in EA1 commenced on November 20, 1999 with the eastern portion of the excavation near the Site trailers (EA1-E). Based on visual observations and verification sample results, the excavation area was ultimately divided into three smaller areas, EA1-E, EA1-W and EA1-S. Material removed from EA1-E was staged on the stockpile area for sampling and was determined to contain PCBs at concentrations of less than 26 mg/kg. This material was therefore used as backfill in EA4. Material excavated from EA1-W contained a mixture of both TSCA and non-TSCA material. Following completion of EA1-W, a test trench was excavated to the south of EA1-W to determine if

additional debris or oily material existed which could potentially impact the groundwater quality. Significant amounts of debris and oily material were encountered and the test trench was expanded and became EA1-S. The material excavated from EA1-S contained a mixture of both TSCA and non-TSCA material.

A fourth smaller area, EA1-C was excavated immediately south of MW1U-93. The area, EA1-C is located at the western most end of EA1-E. Excavation of EA1-C was initiated because the estimated extent of excavation in this area provided in the Work Plan required the removal of MW1U-93. However, since the actual excavations in this area were smaller than the original estimate, removal of MW1U-93 to complete the excavation was not required. Therefore, to ensure that no material existed immediately upgradient of MW1U-93 which could impact groundwater quality, EA1-C was excavated for visual observation and verification sampling. The excavation was observed to contain sandy and gravely gray fill material. Verification samples were collected and the area was backfilled.

Prior to backfilling of the excavations EA1-W and EA1-S, three additional test trenches were excavated to the south of EA1-W and EA1-S to confirm that no additional material in this area required removal as shown on Figure 4.1. Some construction debris was encountered in the test trenches but no oily material or material which contained PCBs was present.

Excavation and backfilling in EA1 was completed February 15, 2000. A total of approximately 2,800 cu. yds. of material was excavated from EA1.

4.4.2 EXCAVATION AREA 2

Excavation in EA2 commenced December 18, 1999. Excavation and backfilling of the area was completed on February 9, 2000. Removal of material from EA2 exceeded what was originally expected in the RA Work Plan. During excavation some construction debris and filter cloth was encountered along the north side of EA2. As a result, additional material was excavated and sampled from this area. Results indicated that the material contained PCBs of less than 26 mg/kg, however the material was sent to Carleton Farms for disposal as it was not suitable for use as backfill material.

Subsequently, a discontinuous, thick sheen of oil was also encountered on the surface of water in EA2. A sample of the EA2 oil was collected and submitted for PCB analysis (Sample No. L-4770-122099-NOVA-183). This oil sheen was determined to contain PCBs at 190 mg/kg. It is suspected that the oil encountered in EA2 was from several drums

which were encountered during the excavation. The drums were staged on the soil stockpile area and removed from the Site with TSCA regulated soil material. CET removed the oil for off-Site disposal as PCB liquid and collected the water for on-Site treatment from the excavations. As a result of these actions no additional oil was observed from the area.

However, additional excavation along the north side of EA2 was conducted to remove debris and soil to meet the cleanup criteria. Once the excavation of soil materials was complete, backfilling commenced February 7, 2000 in EA2. A total of approximately 2,260 cu. yds. of material was excavated from EA2.

4.4.3 EXCAVATION AREA 3

Excavation in EA3 commenced on December 11, 1999. Excavation and backfilling in EA3 was completed February 23, 2000. In keeping with the concept of excavating from the highest contaminated area to the lower contaminated areas, excavation in EA3 was initiated in the southeast corner of the anticipated excavation area. As the excavation moved out from the area of higher concentrations, the soil material changed from the black oily material which typically contained PCBs at concentrations of greater than 50 mg/kg to a brown and gray fill material. Therefore, samples were collected from the sidewalls and floor to evaluate the amount of additional excavation which was required. With the exception of some isolated areas, the verification samples generally met the cleanup criteria for EA-3. As a result, EA3 was divided into four smaller excavations, EA3-SE, EA3-NE, EA3-SW, EA3-NW, rather than one large excavation as originally anticipated. It is expected that the east west division of this area is due to the haul road which runs up to center of the Site.

During excavation of EA3-NW, a thin, discontinuous layer of oil was observed on the surface of the water in the excavation. A sample of the oil in EA3-NW indicated that the material contained PCBs at 57 mg/kg (Sample No. L-4770-120199-SM-075). Therefore, approximately one and one half 55-gallon drums of oil/oily water were collected from the excavation on December 11, 1999 for off-Site disposal as PCB liquid.

As the excavation progressed at EA3-NW, more oil was discovered on the water surface. The oil was appearing as a thin, discontinuous layer of oil emanating from a gravel layer encountered at approximately 8-10 feet bgs, near the top of the upper water table zone. To investigate the source of the oil observed in EA3-NW, the Group requested a three-week extension to the project schedule for execution on January 14, 2000. This request was approved by the U.S. EPA OSC and the investigation proceeded with the

excavation of four test trenches at approximately 10 feet north, south, northwest, and west of EA3-NW. The test trenches were excavated to evaluate the horizontal extent of oil product observed. Based on visual observations of the test trenches, the excavation continued north and west toward the test pits by stripping off the overburden material which was verified to meet the cleanup criteria and excavating the visually contaminated material for off-Site disposal. The excavation continued until all the oil and oily soil had been removed from the excavation. The excavations were left open for several days to ensure that the cleanup was completed. Final verification sampling for EA3-NW was conducted on February 8, 2000. All oil observed in EA3 was collected and placed in 55-gallon drums for off-Site disposal as liquid PCBs. Grading of the area around EA3 began on February 14, 2000 and completion of the cover area and fine grading was conducted during the spring.

A total of approximately 4,700 cu. yds. of material was removed from EA3, approximately 75 percent of which was sent to WD as TSCA material.

4.4.4 EXCAVATION AREA 4

Excavation of EA4 commenced on November 19, 1999. Excavation and backfilling was completed on February 9, 2000. During the period of excavation, a substantial amount of rags and filter cloth was discovered. CET expanded the southeast portion of EA4 beyond the limits identified in the RA Work Plan toward the Ford property as black, oily material was encountered. A total of approximately 6,000 cu. yds. of material was excavated from EA4. Material excavated from EA4 contained both TSCA and non-TSCA material. As a result, all material excavated from this area was disposed of off-Site at the appropriate landfill. Grading of the area around EA4 began on February 14, 2000 and completion of the cover area and fine grading was conducted during the spring.

4.4.5 EXCAVATION AREA 5

Excavation at EA5 began on January 3, 2000. Excavation and backfilling was completed by February 8, 2000. A total of approximately 1,600 cu yds. of material was excavated from EA5. No appreciable issues occurred in this area. Most of the material was used for backfilling EA3, with the remainder sent as TSCA material to WD. Following completion of the excavation, six test trenches were excavated south of EA5 to ensure that all material had been removed as shown on Figure 4.1. During the excavation of Test Trench No. 4, some dark colored sand material was encountered. The material was sampled and determined to meet Michigan Act 451, Part 201 residential soil criteria.

However, due to the potential for this area to be redeveloped as a residential land use, the dark colored sand was excavated and used as backfill in EA3. Backfill material for EA5 was taken from the borrow area.

4.5 SOIL HANDLING AND PCB CHARACTERIZATION

Excavated materials were either directly loaded onto a truck for off-Site disposal or transported to the soil staging/stockpile area for temporary storage and waste characterization purposes. The temporary storage allowed for waste characterization of the material to determine appropriate use or disposal. Material which contained concentrations of PCBs below the commercial criteria was excavated and either directly placed into an excavation as backfill or staged in the vicinity of an excavation for future backfilling. The methodology for waste characterization was conducted in accordance with Section 3.9.2 and Appendix A, Sampling and Analysis Plan, of the Work Plan.

Material that could not be directly loaded to off-Site disposal vehicles was placed in up to 500 cu. yd. stockpiles on the stockpile area. The stockpile area consisted of a bermed and lined area to collect any stormwater generated from stockpiles. Approximately 12 inches of clean sand was placed on top of the liner during construction of the berm to prevent damage to the liner during loading of trucks for off-Site disposal. Composite samples of each stockpile were collected to verify the field screening for PCB concentration and proper waste characterization. The results of the soil stockpile analysis for PCBs are summarized in Table 4.6. Each stockpile was maintained such that the potential for cross contamination was minimized. Any material which came in contact with TSCA material on the stockpile area was disposed of as TSCA material at WD. Stockpiles were covered at the end of each day to prevent precipitation from being contaminated by the soil material.

Following removal of the final excavated material from the stockpile area, five composite samples were collected from the floor of the stockpile area to characterize the stockpile facility material for disposal. The results of the five composite samples are provided in Table 4.6. The stockpile floor material contained PCBs at concentrations greater than 26 mg/kg but less than 50 mg/kg and was therefore excavated and disposed of at an off-Site landfill as non-TSCA material.

Material used for construction of the Site access roads was collected and stockpiled near excavation areas EA3 or EA4. A composite sample was taken of each stockpile of access road material using the same procedures as the soil stockpiles and submitted for PCB analysis. The results of the access road samples are presented in Table 4.6. All access

road material sample results were below 26 mg/kg PCBs and were therefore used as backfill in EA3 and EA4.

4.6 TRANSPORTATION AND DISPOSAL

Non-liquid material excavated from the Site was placed in Department of Transportation (DOT) approved vehicles for shipment to either the WD TSCA permitted landfill located in Belleville, Michigan (MID 048 090 633) or to Carleton Farms Landfill (Carleton Farms) located in New Boston, Michigan, a Michigan Type II sanitary landfill. Prior to disposal of any non-liquid material, samples of the material were collected and sent to each landfill for profiling, characterization, and waste approval. Material excavated from areas which were suspected to contain PCB concentrations of less than 50 mg/kg but greater than 26 mg/kg were stockpiled for characterization to confirm the material was suitable for disposal at Carleton Farms. Only material from excavations which had been verified to contain no material containing PCBs at concentrations of 50 mg/kg or greater either through Site characterization, or through verification sampling of the excavation, were allowed to be directly loaded into DOT approved vehicles for disposal at Carleton Farms.

Material which was suspected to contain PCBs at 50 mg/kg or greater was typically loaded directly into DOT approved vehicles for disposal at WD. Occasionally, small amounts of TSCA material, or material which potentially contained PCB concentrations of less than 50 mg/kg were staged on the stockpile area for characterization. A summary of the material sent to Carleton Farms Landfill is provided in Table 4.7. A complete set of disposal manifests to Carleton Farms Landfill is provided in Appendix D. A summary of the material sent to WD is provided in Table 4.8. All disposal documentation of loads sent to WD is provided in Appendix E.

A total of 14,819.07 tons of excavated material was taken off-Site for disposal. Of that total amount 5,647.10 tons was disposed at Carleton Farms Landfill, while the remaining 9,171.97 tons of material was sent to WD.

At the start of the Work Plan implementation, approximately 50 drums located at the north end of the Site from previous investigative activities were opened and determined to be empty. The drums were crushed and were sent off-Site for disposal at Carleton Farms Landfill. The remainder of the drums from previous investigative activities contained decontamination and monitoring well purge water. The contents were consolidated into a frac tank for treatment in the on-Site treatment system. The drums were crushed and sent to Carleton Farms Landfill for disposal as non-hazardous waste.

Liquid oil material which was collected from EA2 and EA3 was collected by CET and stored in drums for characterization and disposal. The oil material contained greater than 50 mg/kg PCBs and therefore required disposal under TSCA. CET arranged for the material to be disposed of by The Environmental Quality Company (EQ). EQ ultimately shipped a total of six drums of oil material to Environmental Recycling of Bowling Green, Ohio. Environmental Recycling was not able to manage the oil at their facility and subsequently transferred the six drums to Trans-Cycle Industries Inc. in Pell City, Alabama. Trans-Cycle Industries, Inc. emptied the drums and sent the liquid by tanker truck to Chemical Waste Management's facility in Port Author, Texas for incineration. The drums were disposed of by metals cleaning and recycling by Trans-Cycle Industries, Inc. at their Pell City, Alabama facility. The liquid was incinerated by Chemical Waste Management at their Port Author, Texas facility in April 2000. Disposal documentation including certificates of destruction for the PCB liquids is provided in Appendix F.

4.7 WASTEWATER MANAGEMENT

CET developed and submitted a Wastewater Management Plan for the collection and treatment of groundwater and surface water which accumulated on-Site during the RA or was encountered in Site excavations. The on-Site wastewater treatment facility was mobilized to the Site and began operation during the week of December 20, 1999. The wastewater treatment facility consisted of a series of filters to remove particles from the water followed by carbon absorption to remove any PCBs. Prior to mobilization of the treatment system, CET collected water from the decontamination area, Site excavations, and the on-Site drums from previous investigations in a frac tank for later treatment.

Startup of the system consisted of re-circulation of the water in the frac tank through the treatment system and back to the frac tank. The system was allowed to operate so that at a minimum the entire volume of the frac tank was run through the treatment system. A sample was collected from the frac tank and submitted by CET for chemical analysis. Sample results indicated a high pH in the frac tank which was suspected to be a result of the flushing out of the new treatment system. Re-circulation of the system was continued and the pH monitored on-Site until the pH was within an acceptable range. Once CET was satisfied that the water met the discharge criteria, U.S. EPA requested a final sample of the frac tank prior to discharging to Pond No. 2.

Following the initial startup of the wastewater treatment facility, CET's Wastewater Management Plan outlined a procedure for water from the excavations to be collected in

a frac tank prior to treatment. Once sufficient water was collected, CET proposed to operate the treatment system and discharge the water to Pond No. 2 with sampling of the effluent at a frequency of one sample per week. CET's proposed operation of the wastewater treatment facility was in accordance with the Project Specifications included in the Work Plan.

On January 5, 2000 the U.S. EPA OSC raised concerns about water from EA2 which had come in contact with the oil from EA2 which contained PCBs at 190 mg/kg. The U.S. EPA indicated that the water which came in contact with the oil should be collected and treated separately as TSCA material. CRA's on-Site representative, immediately informed CET of the U.S. EPA's request and inspected the pumping configuration for water being removed from EA2 for treatment. CRA's on-Site representative discovered that CET was collecting water from EA2, sending the water to the treatment facility for treatment, and directly discharging to Pond No. 2 without prior storage in the frac tank. CRA immediately collected a sample of the effluent and instructed CET to shut down the treatment system. Approximately 9,100 gallons of water had been treated by CET in this manner. CRA immediately notified the U.S. EPA OSC of the incident and filed an incident report with U.S. EPA. CRA collected a sample of the water from Pond No. 2 near the point of discharge for PCB analysis. The effluent sample from the treatment system and the Pond No. 2 surface water sample did not contain PCBs at detectable levels.

Following the incident on January 5, 2000, CET acquired additional frac tanks to store treated effluent from the system prior to discharge as requested by the U.S. EPA OSC. The three additional frac tanks allowed water to be treated, sampled, and stored pending the results of the effluent sample, then discharged once the effluent was confirmed to meet the effluent criteria. A summary of the effluent sample results collected from the wastewater treatment system, including the startup sampling, is provided in Table 4.9. A total of approximately 190,000 gallons of water was collected from excavations and treated on Site during the implementation of the RA Work Plan. The wastewater treatment facility effluent results are provided in Appendix G.

4.8 GROUNDWATER MONITORING

CRA collected groundwater samples from the existing monitoring wells on February 24, 28, and 29, 2000 prior to demobilizing from the Site. The groundwater samples were submitted for analysis for VOCs, SVOCs, PCBs, beryllium, iron, and manganese. A summary of groundwater monitoring results are presented in Table 4.10. The location of the monitoring wells sampled in February, 2000 are shown on Figure 4.4.

Groundwater samples were collected and analyzed in accordance with the protocols identified in the Sampling and Analysis Plan and the Quality Assurance Project Plan, Appendix A and Appendix B, respectively, of the Work Plan.

Following review of the groundwater results by the U.S. EPA OSC during the Site final inspection conducted on June 1, 2000, it was determined that several of the wells could be abandoned as they will no longer be required for the monitoring program. The specific details of the well installation and abandonment was provided in a letter from CRA to the U.S. EPA OSC dated June 9, 2000 (included as Appendix H). The work outlined in the June 9, 2000 letter was conducted during the period of June 21 to 26, 2000. The following monitoring wells, were abandoned and installed as part of the RA activities:

- MW1U-93 and MW1D-93 was abandoned and replaced by MW3U-00 which was located slightly north of the current monitoring wells at the property line;
- MW1U-00 and MW4U-00 were installed along the north property line, one each to the east and west of MW3U-00;
- MW2D-93 was abandoned, however, MW2U-93 remains in place as part of the monitoring network; and
- MW3U-93, MW3D-93, MW4U-93, MW5U-93, and MW6U-93 were abandoned as they will not be required for the groundwater monitoring program.

At each monitoring well scheduled to be abandoned, an attempt was made to first remove the well casing from the ground. If this was not achievable the well casing was cut off between two and three feet below the ground surface, and the well was pressure grouted with cement/bentonite grout to the top of the casing. If the well casing could be removed, the annulus of the well was pressure grouted with cement/bentonite grout while the casing was removed. Following grouting of the wells, any well protection structures were removed and the area around the well was graded to match existing conditions.

Figure 4.5 shows the monitoring well network which will be used for the long term groundwater monitoring program. Boring logs for the groundwater monitoring program are provided in Appendix I.

The well abandonments were conducted in general accordance with Michigan Act 368 (Public Health Code) Rules 325.1601, and Rules 325.1662 through 325.1670. Under Michigan regulations, only the drinking water well abandonments are legally required to be reported to the public health department.

5.0 VERIFICATION SAMPLING

Excavations were advanced in each of the excavation areas until visual or olfactory evidence suggested that the appropriate material had been removed and the cleanup objectives met. Verification samples were then collected by NOVA or CRA from the wall and the floor of the excavation. The minimum number of samples for each excavation area was selected based on the Michigan Department of Environmental Quality (MDEQ) guidance document, Verification of Soil Remediation, April 1994 (VSR). Following collection of the verification samples, the sample locations were surveyed for future reference. Sample collection and analysis was conducted in accordance with the protocols identified in the Sampling and Analysis Plan and Quality Assurance Project Plan, Appendix A and Appendix B, respectively of the Work Plan.

Table 5.1 presents a summary of the final PCB verification sample results for each of the five excavation areas. All verification sample results, including samples which were above criteria and required additional excavation are summarized in Appendix J. Quality Assurance/Quality Control validation memoranda for the verification samples are provided in Appendix K. Verification samples which did not meet the required criteria were re-excavated and sampled until the appropriate cleanup criteria had been met. The PCB verification criteria applicable for each area is summarized below:

- Excavation Area 1 - 1.2 mg/kg;
- Excavation Area 2 - 1.2 mg/kg;
- Excavation Area 3 - 26 mg/kg;
- Excavation Area 4 - 26 mg/kg; and
- Excavation Area 5 - 1.2 mg/kg.

Figures 5.1 through 5.4 present the verification sample locations for each of excavation areas EA1 through EA5. Once each excavation area had been determined to meet the applicable PCB cleanup criteria, additional soil samples were collected and submitted for analysis for vinyl chloride and phenanthrene. The results of the vinyl chloride and phenanthrene samples is presented in Table 5.2. Upon verification that the vinyl chloride and phenanthrene results met the applicable standard of 300 µg/kg for vinyl chloride and 2,300 µg/kg for phenanthrene, the excavation was backfilled and graded.

Following completion of the RA activities, one surface water sample was collected from the north end of Pond No. 1 to verify that the pond had not been impacted by the RA as required by the Work Plan. In addition, during the implementation of the RA, a surface water sample was collected from Pond No. 2 (January 5, 2000 direct discharge incident).

The sample locations of the surface water samples are presented on Figure 5.5. The results of the surface water samples are provided in Table 5.3. Water samples were also collected in excavations EA1-W and EA4 during the removal process. These results are included in Table 5.4. The surface water and excavation water analytical results and chain of custody records are provided in Appendix L.

6.0 REFERENCES

- CRA, 1992 "Summary of Prior Site Investigations and Identification of Data Gaps Report", EOC/EECA Study, Textile Road Site, Waterloo, Ontario, November 1992.
- CRA, 1994a "Task 8, Extent of Contamination (EOC) Study Report, Textile Road Site", Waterloo, Ontario, February 1994.
- CRA, 1994b "Engineering, Evaluation, and Cost Analysis (EE/CA) Report, Textile Road Site", Waterloo, Ontario, November 1994.
- CRA, 1995 "Additional Investigation Study Report, Textile Road Site", Waterloo Ontario, December 1995.
- CRA, 1996 "Re-Evaluation of Select Removal Action Alternatives: Addendum to EE/CA, Textile Road Site", Waterloo, Ontario, February 1996.
- MDEQ, 1994 "Guidance Document Verification of Soil Remediation", Environmental Response Division, Waste Management Division, April 1994, Revision 1.

7.0 SUMMARY, CONCLUSIONS, AND CERTIFICATION

The following summarizes the activities conducted to comply with the U.S. EPA approved Work Plan:

- removal of approximately 50 drums from previous investigative activities and disposal of emptied and crushed drums to Carleton Farms Landfill;
- removal and disposal of 9,171.97 tons of non-liquid TSCA PCB material at Wayne Disposal, Inc.;
- removal and disposal of 5,647.10 tons of non-liquid non TSCA material at Carleton Farms landfill;
- removal and appropriate consolidation of approximately 1,362 tons of excavated material containing PCBs at less than 26 mg/kg in the designated on-Site consolidation area;
- collection and verification of soil samples under U.S. EPA oversight from excavation walls and floors to ensure soil cleanup criteria was met;
- collection of samples of surface water encountered during excavation for on-Site treatment at the water treatment facility;
- backfilling and grading of excavated areas with clean soil;
- establishment of a vegetative cover over the area of the Site which continues to contain PCBs in excess of the Michigan Act 451, Part 201 residential cleanup criteria;
- collection of groundwater samples from existing monitoring wells; and
- installation of new monitoring wells and abandonment of monitoring wells no longer required for the on-Site groundwater monitoring network.

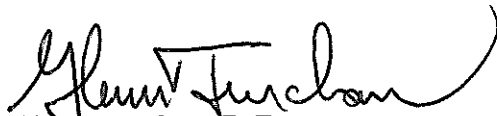
A summary of excavation, backfilling, and disposal quantities is provided in Table 7.1. A good faith cost estimate of project costs incurred to comply with the AOC is provided in Table 7.2.

Under penalty of law, I certify that, to the best of my knowledge, after appropriate inquiries of all relevant persons involved in the implementation of the Work Plan and preparation of this Report, the information submitted is accurate and complete, and the activities were conducted in accordance and with the requirements of the U.S. EPA approved Work Plan.

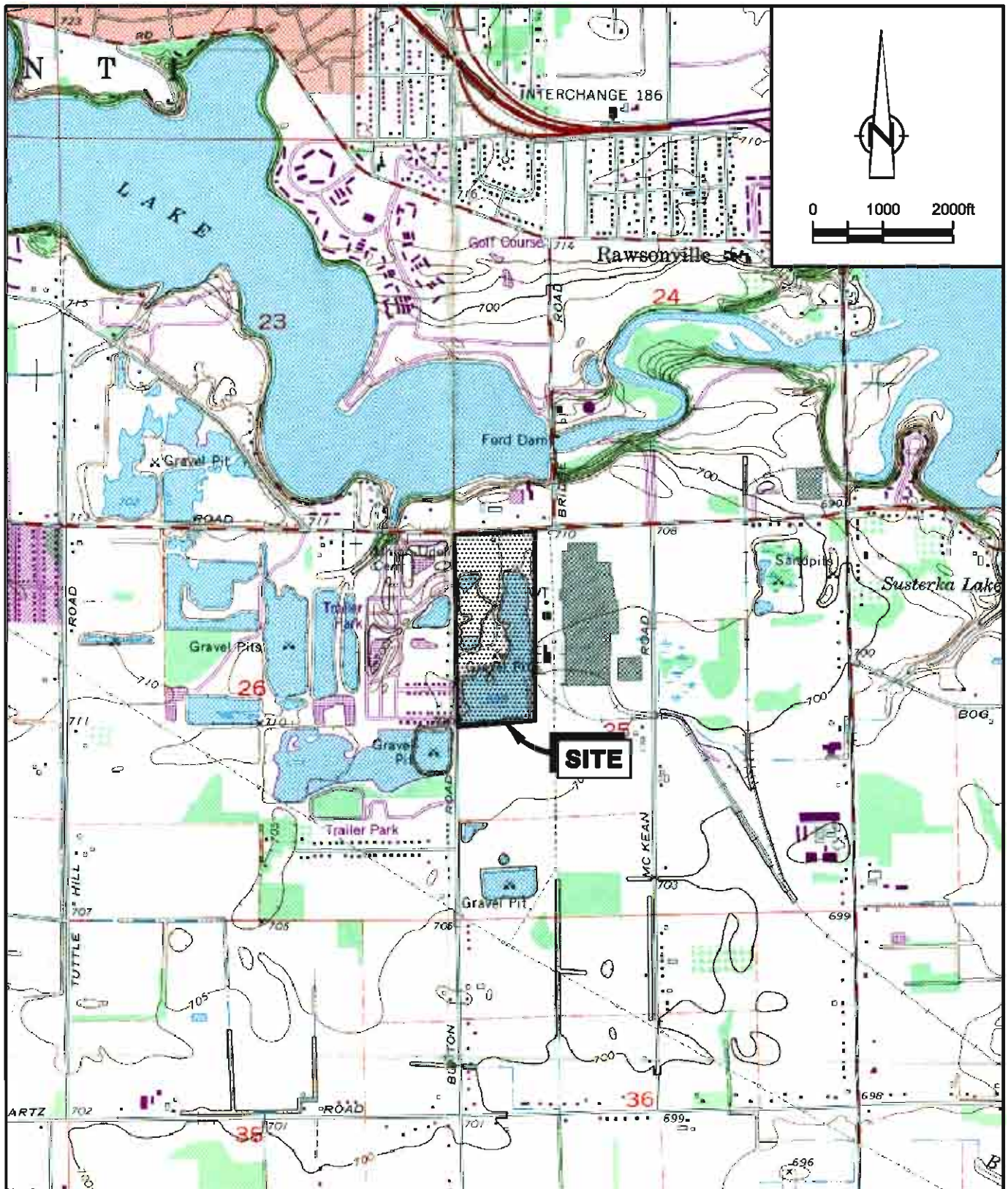
CONESTOGA-ROVERS & ASSOCIATES



Gregory A. Carli, P. Eng.



Glenn Turchan, P. Eng.



SOURCE: USGS QUADRANGLE MAP,
YPSILANTI EAST, MICHIGAN



figure 1.1
SITE LOCATION
TEXTILE ROAD SITE
Washtenaw County, Michigan

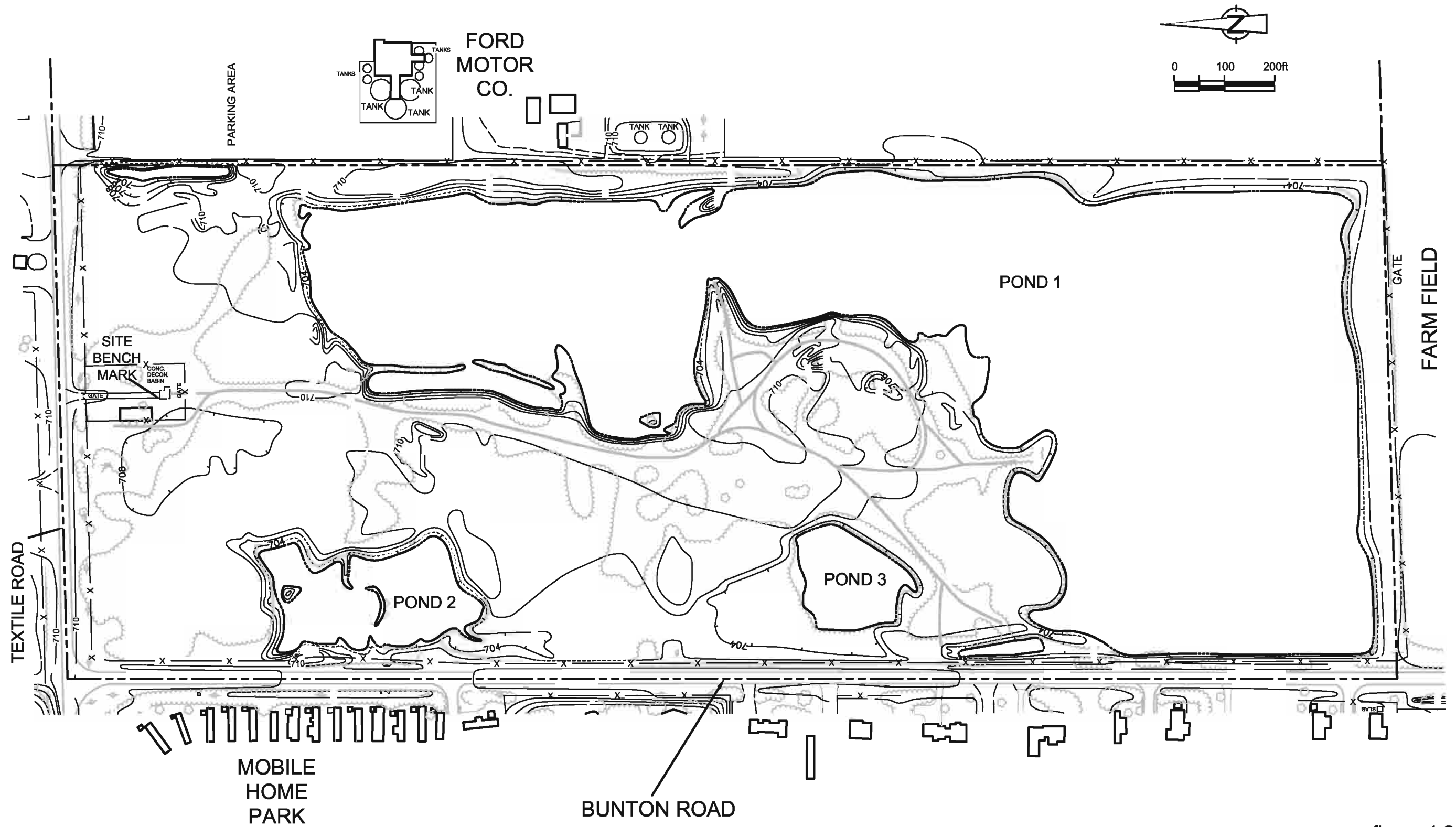
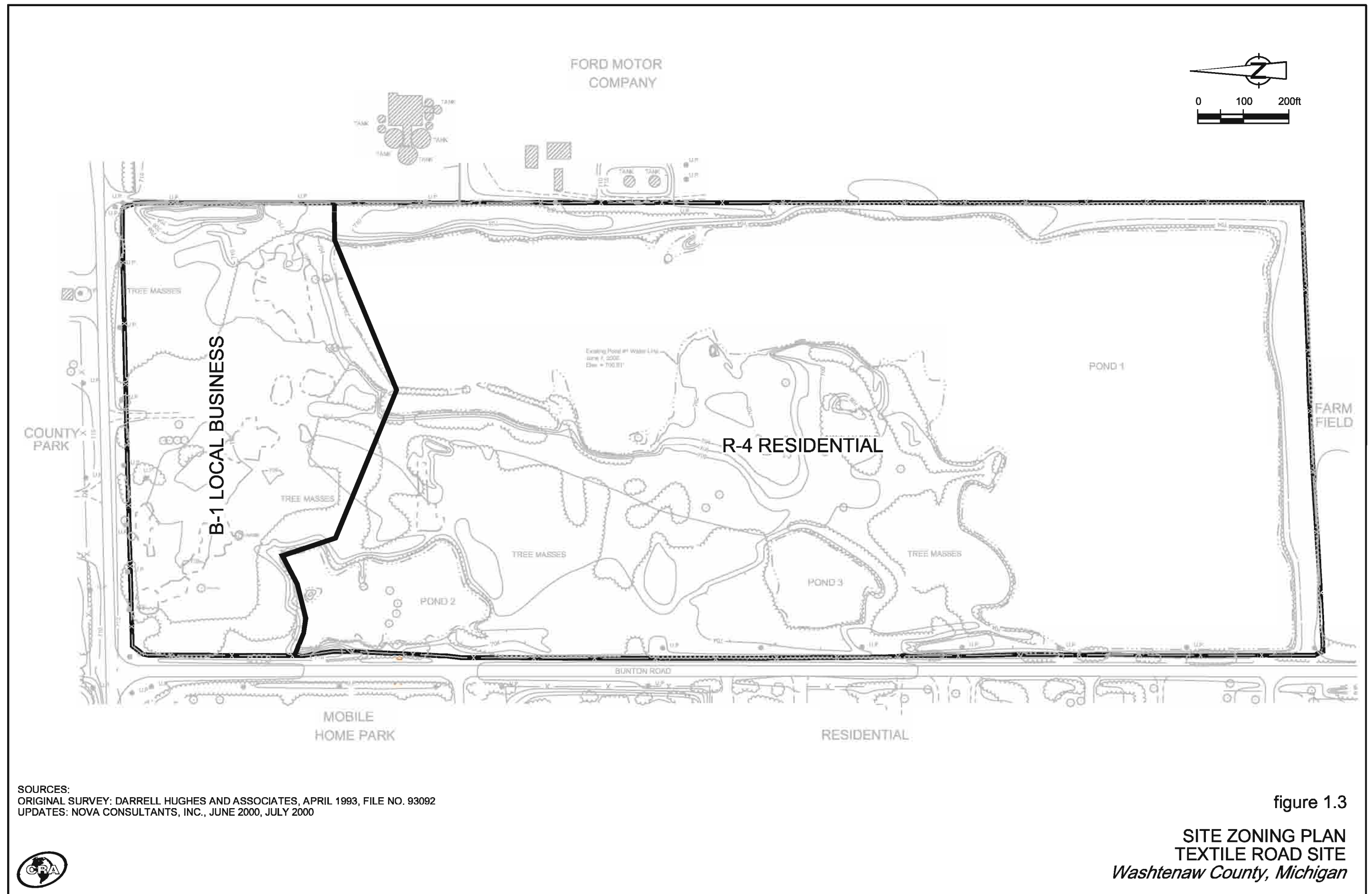


figure 1.2

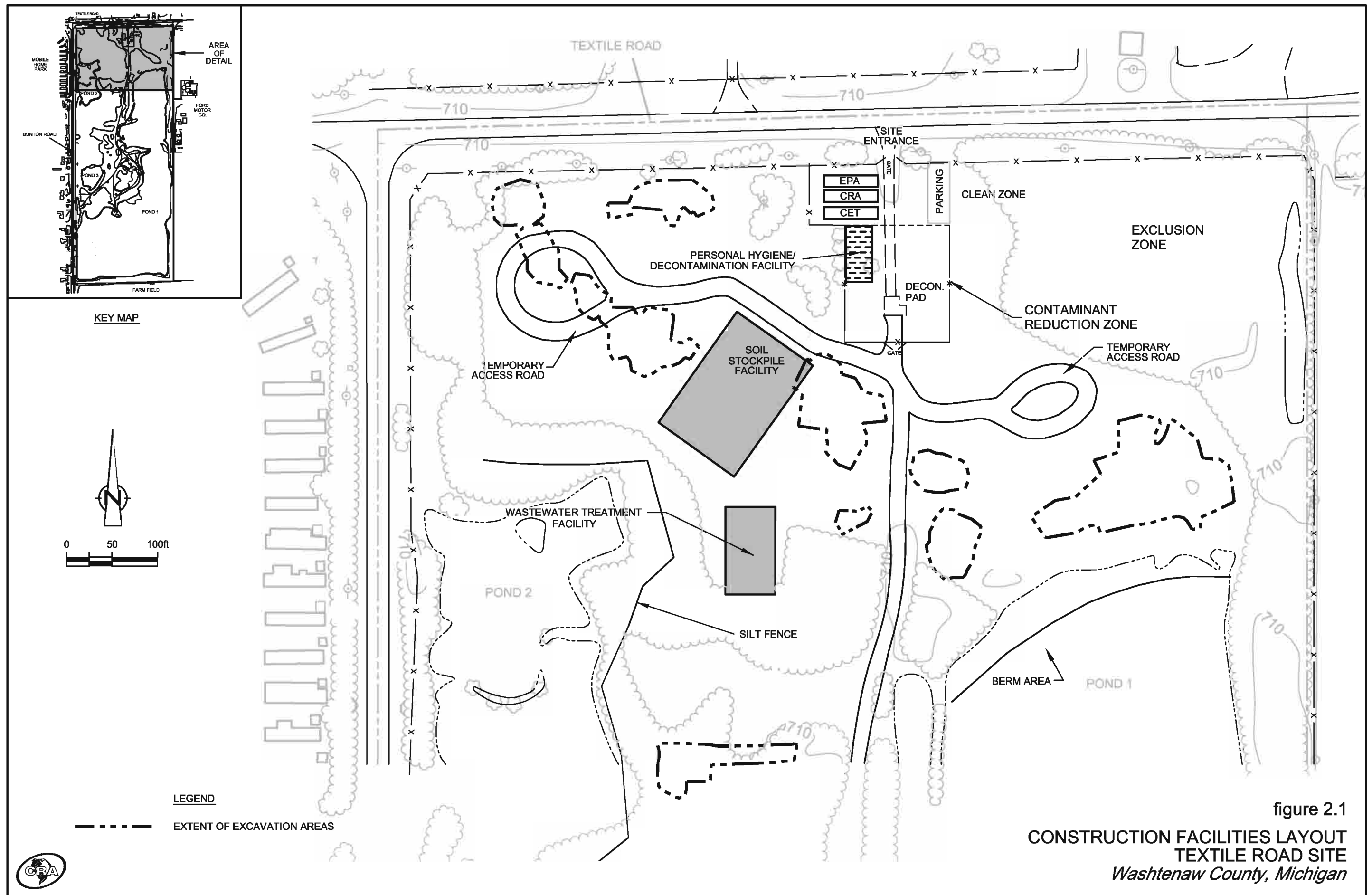
PRE-REMOVAL ACTION SITE CONDITIONS
 TEXTILE ROAD SITE
 Washtenaw County, Michigan





SOURCES:
ORIGINAL SURVEY: DARRELL HUGHES AND ASSOCIATES, APRIL 1993, FILE NO. 93092
UPDATES: NOVA CONSULTANTS, INC., JUNE 2000, JULY 2000





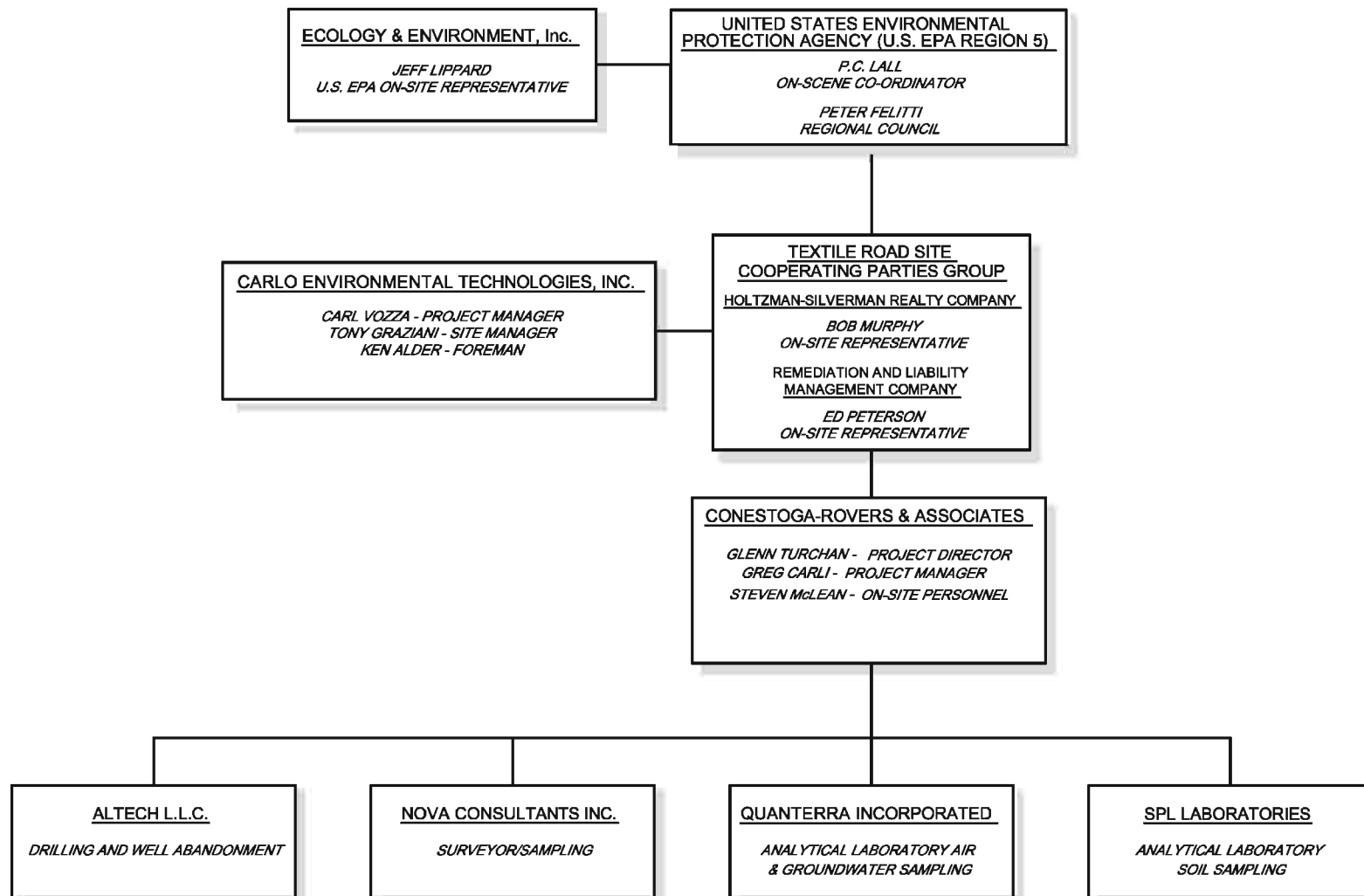


figure 3.1
PROJECT ORGANIZATIONAL CHART
TEXTILE ROAD SITE
Washtenaw County, Michigan



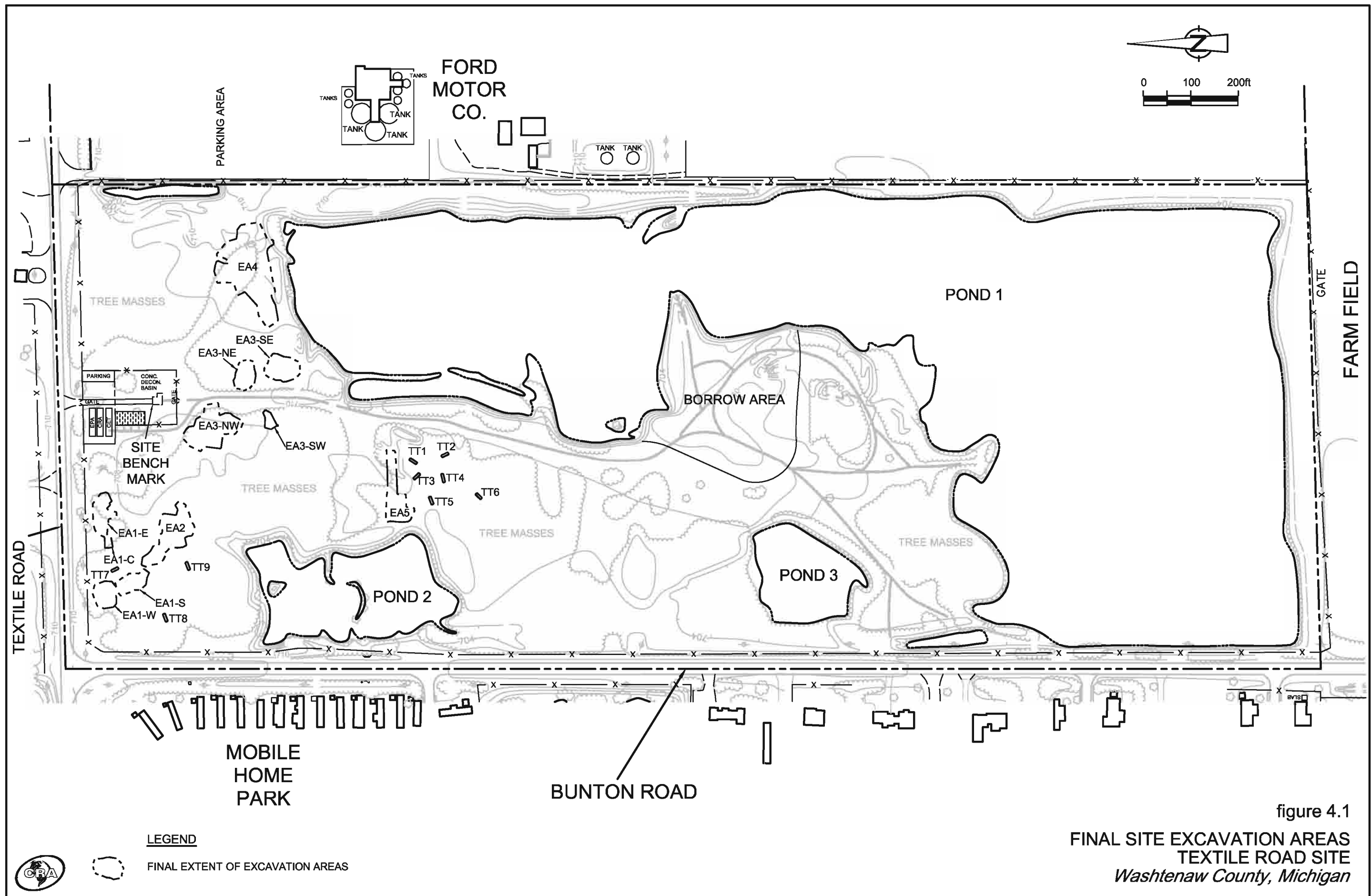
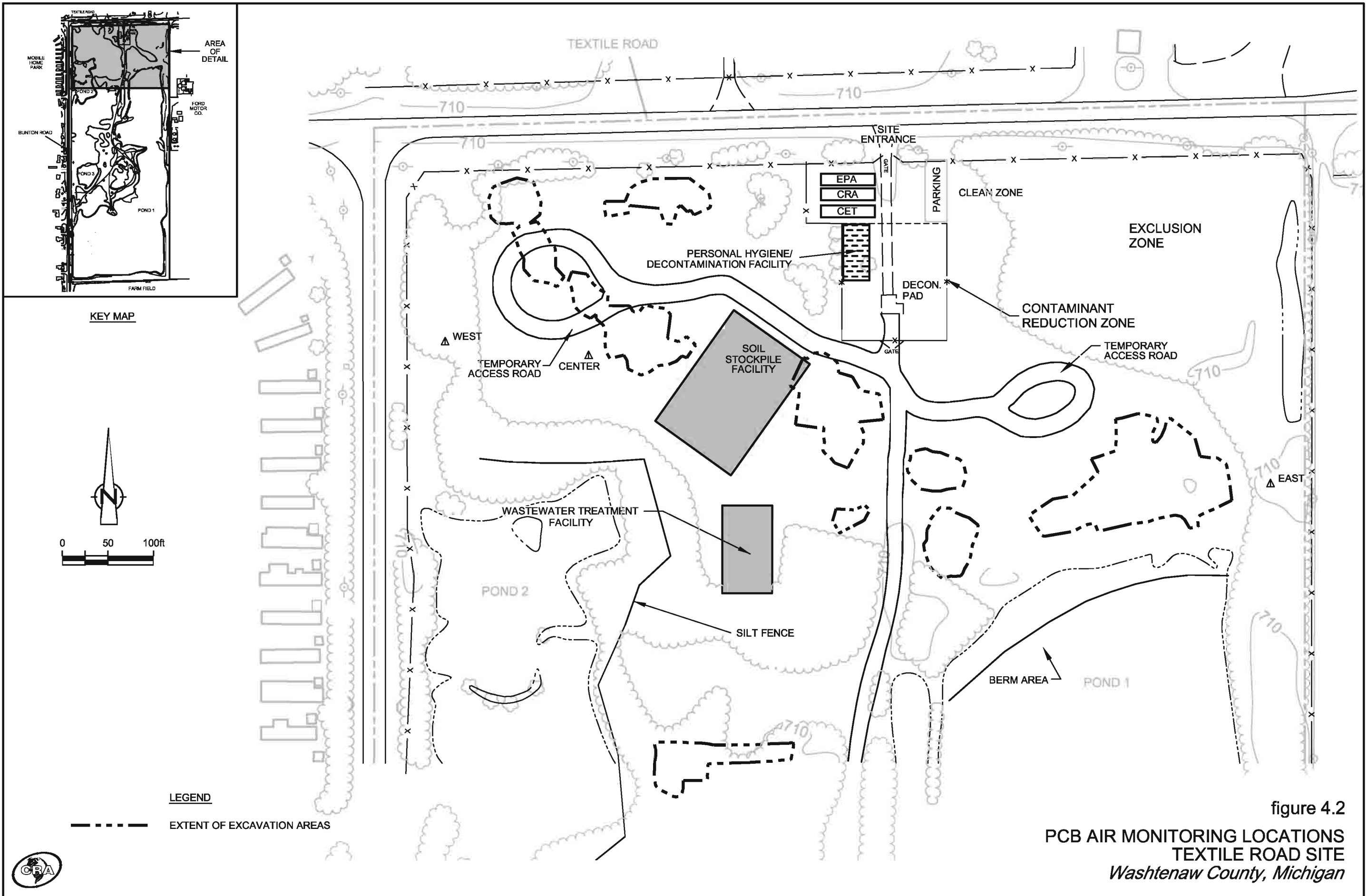
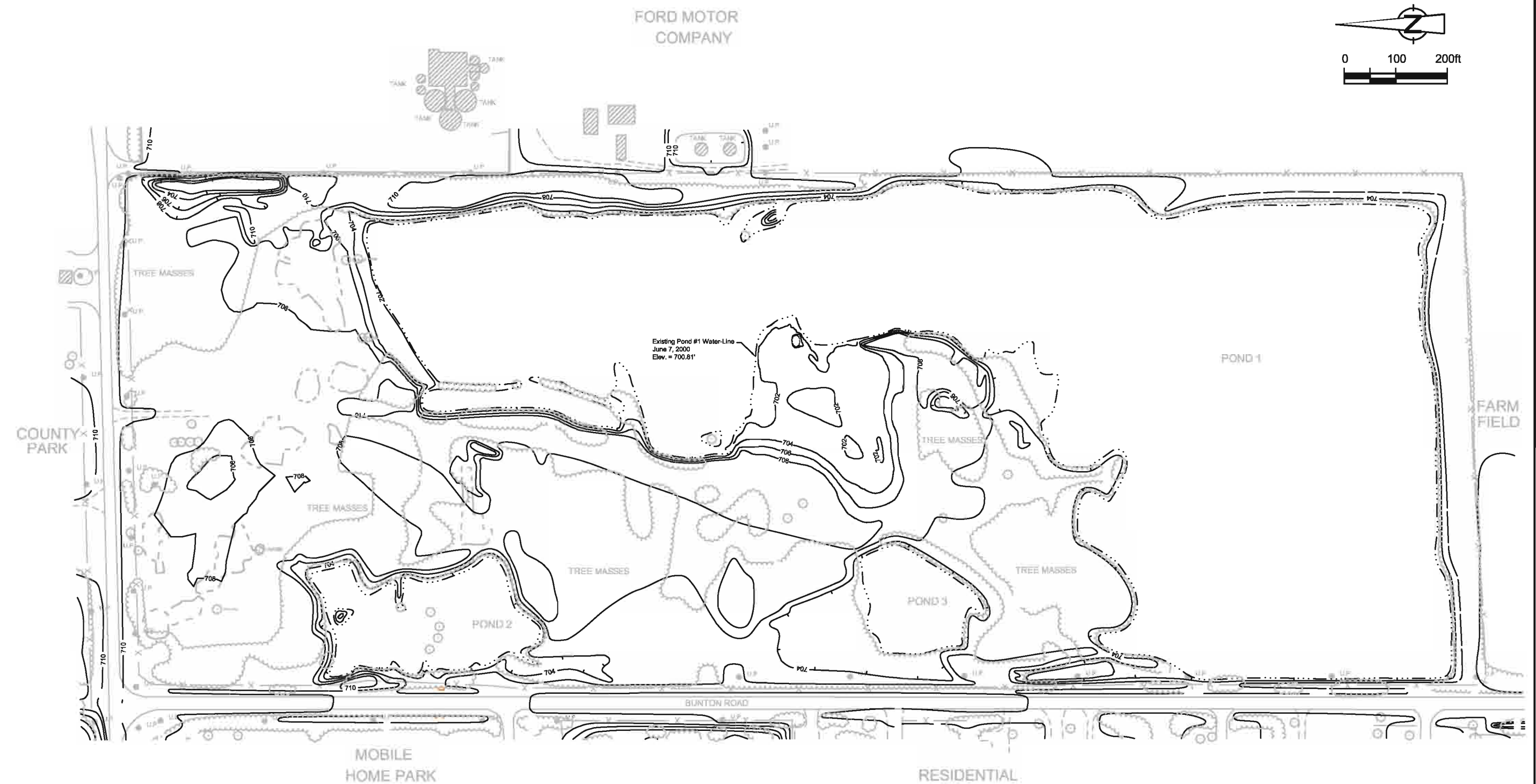


figure 4.1
 FINAL SITE EXCAVATION AREAS
 TEXTILE ROAD SITE
 Washtenaw County, Michigan





SOURCES:
 ORIGINAL SURVEY: DARRELL HUGHES AND ASSOCIATES, APRIL 1993, FILE NO. 93092
 UPDATES: NOVA CONSULTANTS, INC., JUNE 2000, JULY 2000



04770-00(024)GN-WA006 AUG 11/2000

figure 4.3

FINAL GRADING PLAN
TEXTILE ROAD SITE
Washtenaw County, Michigan

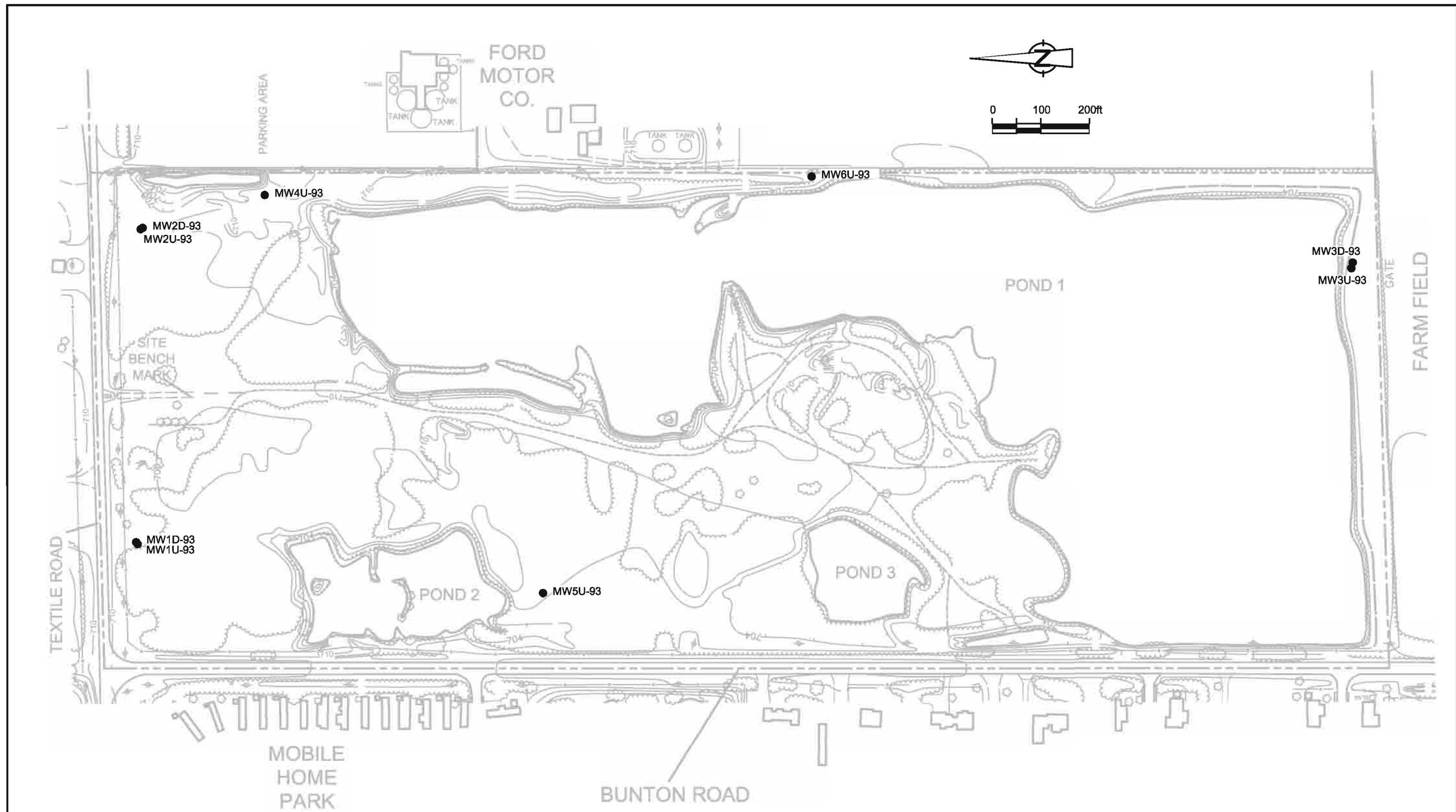
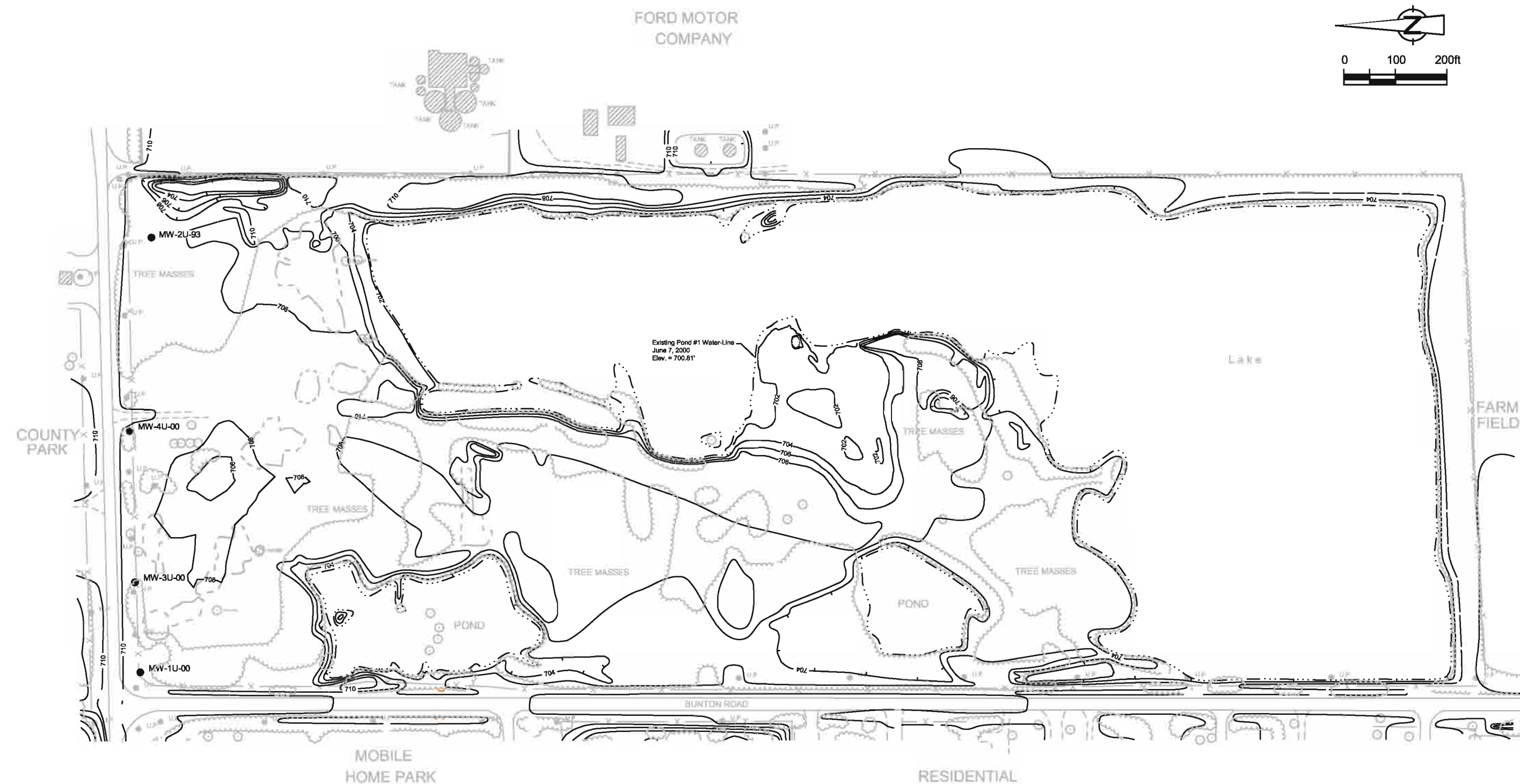


figure 4.4

PRE-REMOVAL ACTION MONITORING WELL LOCATIONS
 TEXTILE ROAD SITE
 Washtenaw County, Michigan





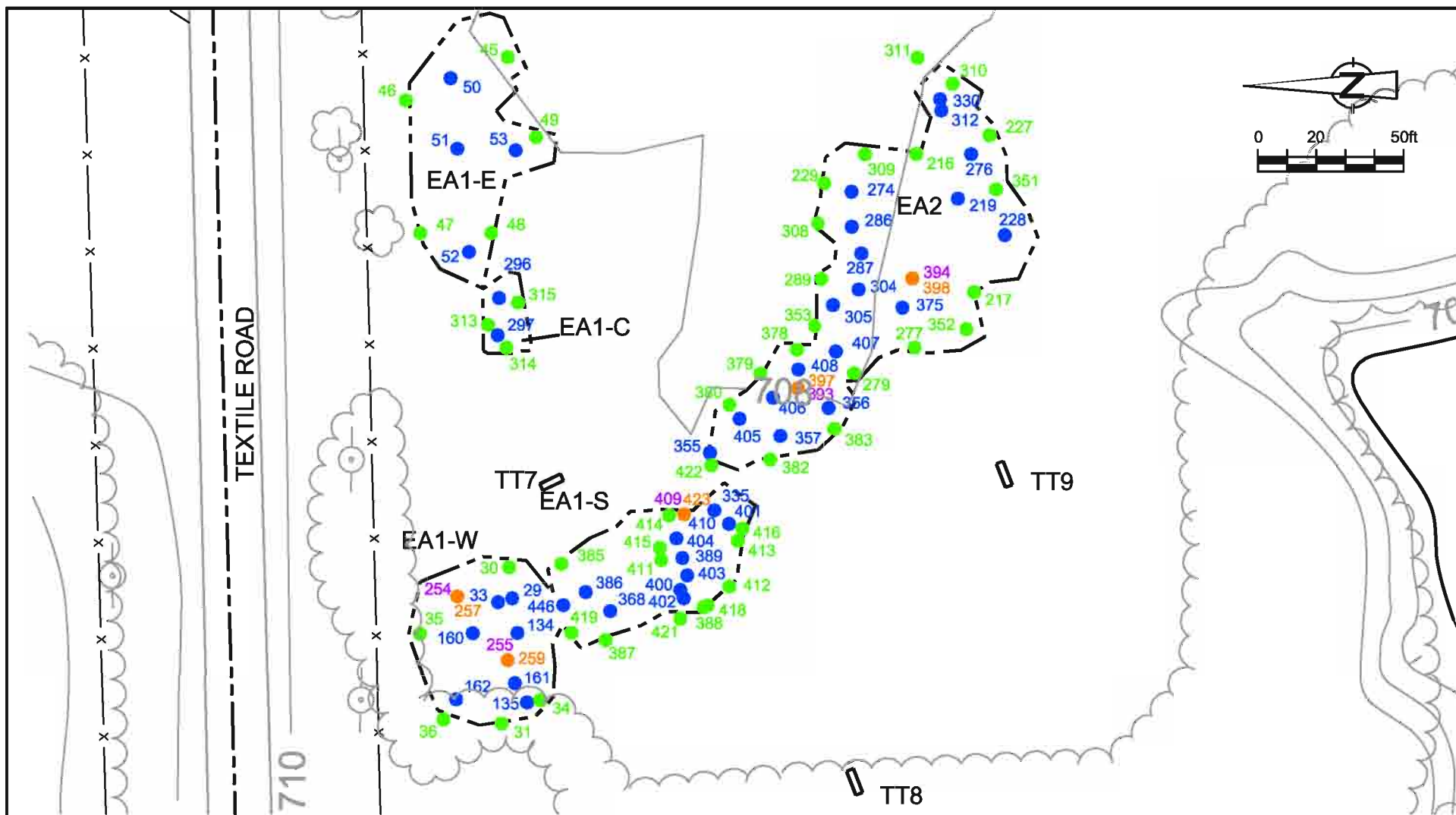
SOURCES:
 ORIGINAL SURVEY: DARRELL HUGHES AND ASSOCIATES, APRIL 1993, FILE NO. 93092
 UPDATES: NOVA CONSULTANTS, INC., JUNE 2000, JULY 2000



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figure 4.5

POST-REMOVAL ACTION MONITORING WELL LOCATIONS
 TEXTILE ROAD SITE
 Washtenaw County, Michigan



LEGEND

- EXTENT OF EXCAVATION AREAS
- 100 FLOOR PCB SAMPLE LOCATION
- 100 WALL PCB SAMPLE LOCATION
- 100 VOC SAMPLE LOCATION
- 100 SVOC SAMPLE LOCATION

figure 5.1

VERIFICATION SAMPLE LOCATIONS
EXCAVATION AREAS 1 AND 2
TEXTILE ROAD SITE
Washtenaw County, Michigan



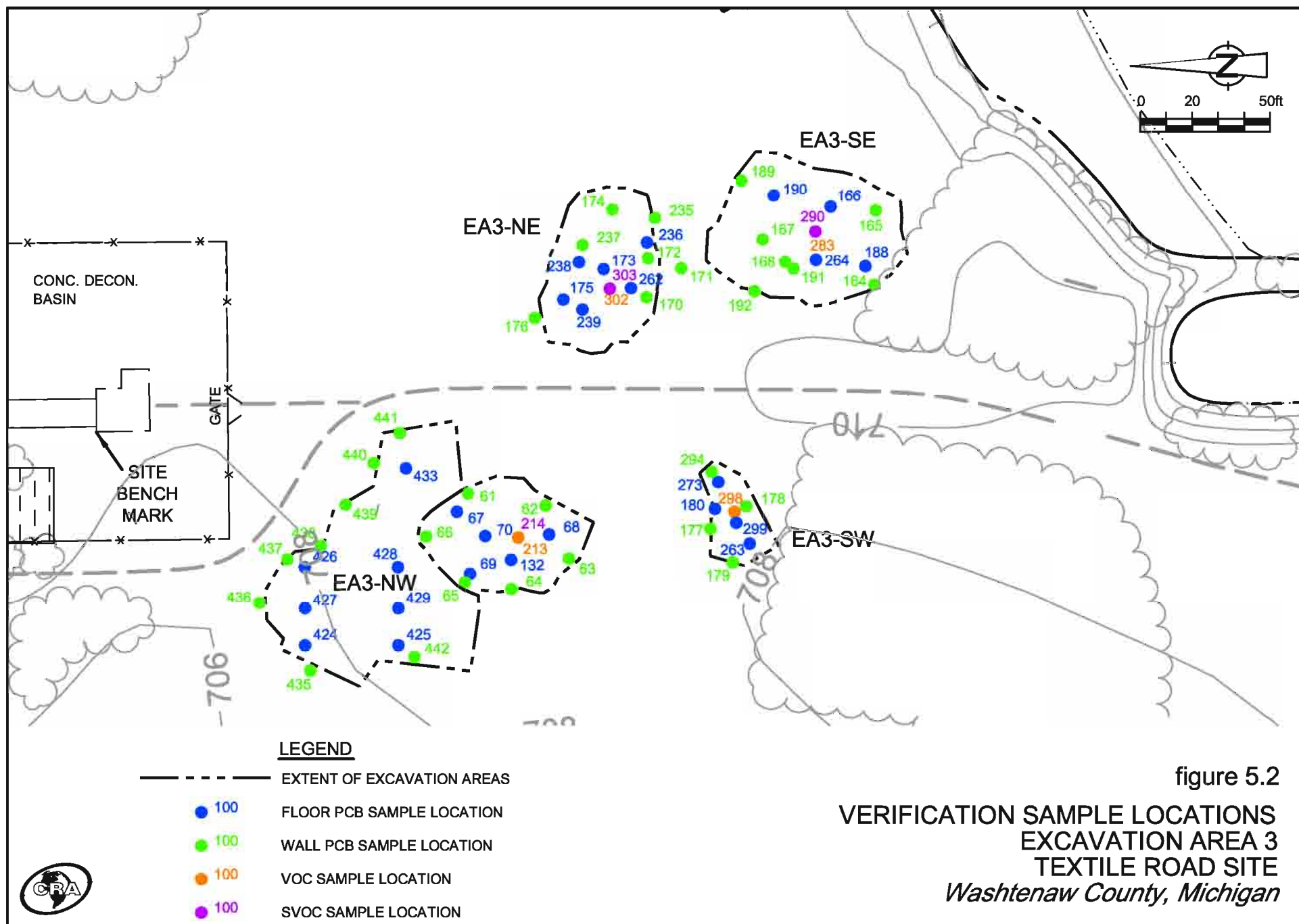
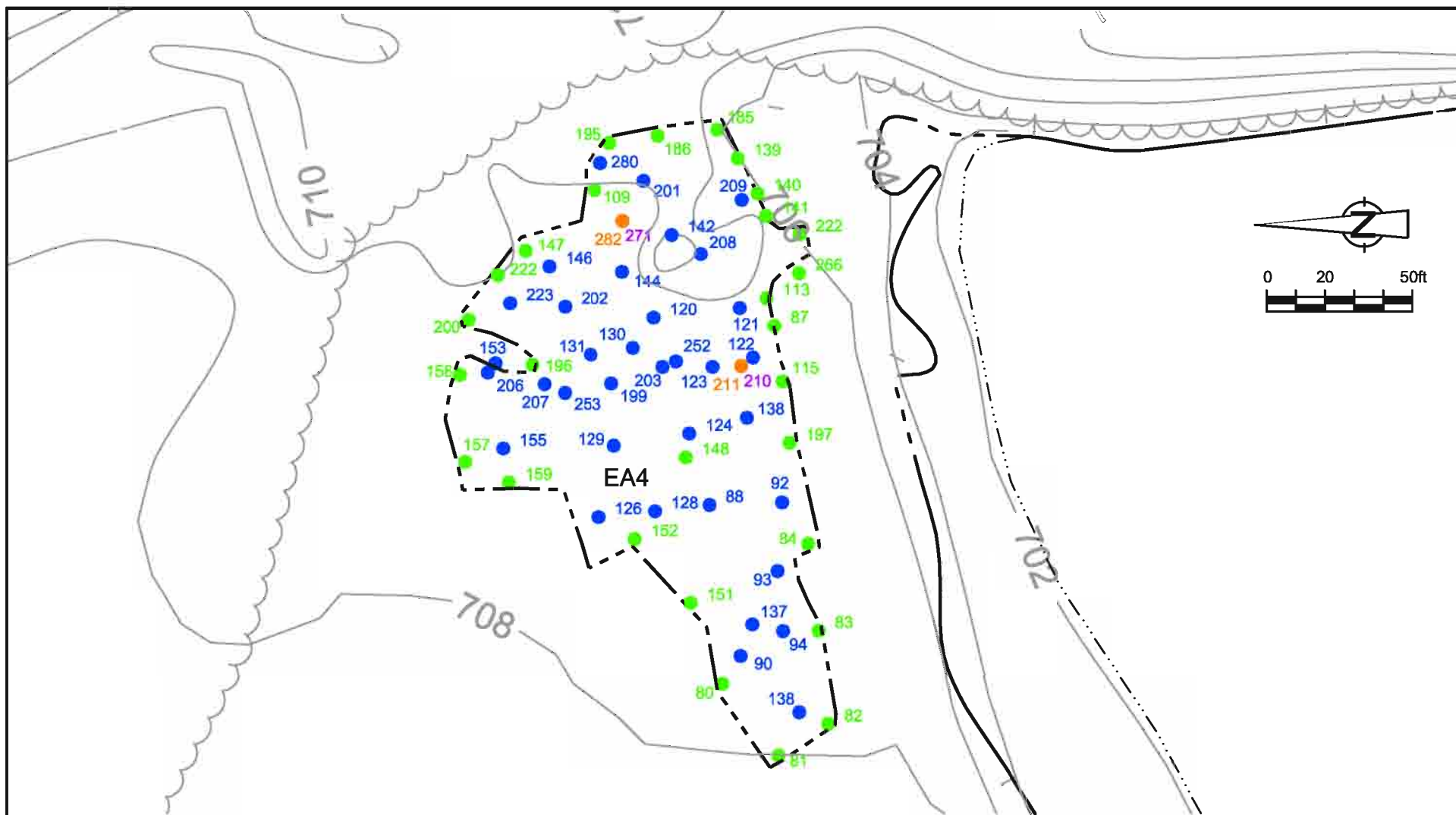


figure 5.2



LEGEND

- EXTENT OF EXCAVATION AREAS
- 100 FLOOR PCB SAMPLE LOCATION
- 100 WALL PCB SAMPLE LOCATION
- 100 VOC SAMPLE LOCATION
- 100 SVOC SAMPLE LOCATION

figure 5.3

**VERIFICATION SAMPLE LOCATIONS
EXCAVATION AREA 4
TEXTILE ROAD SITE
Washtenaw County, Michigan**



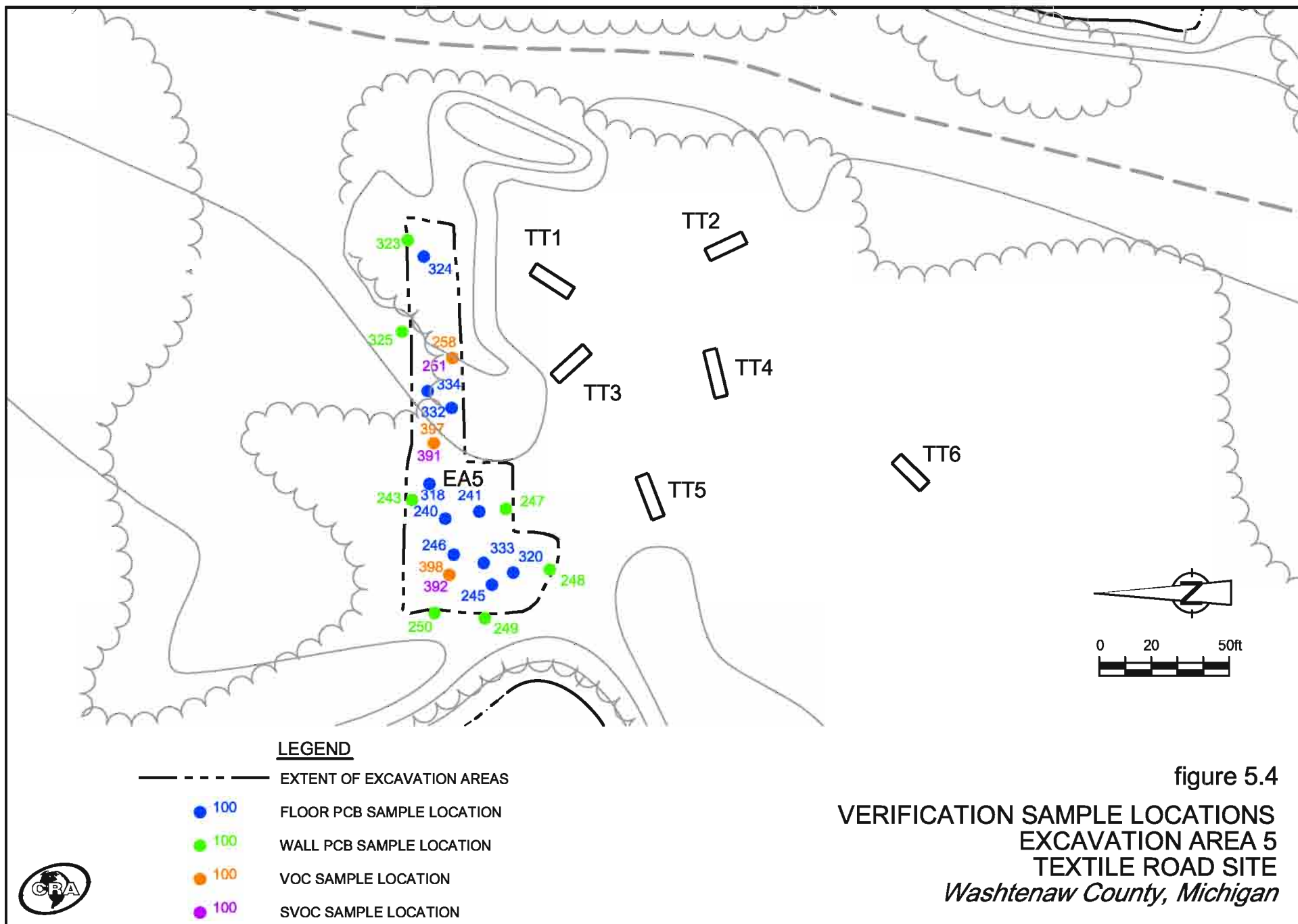
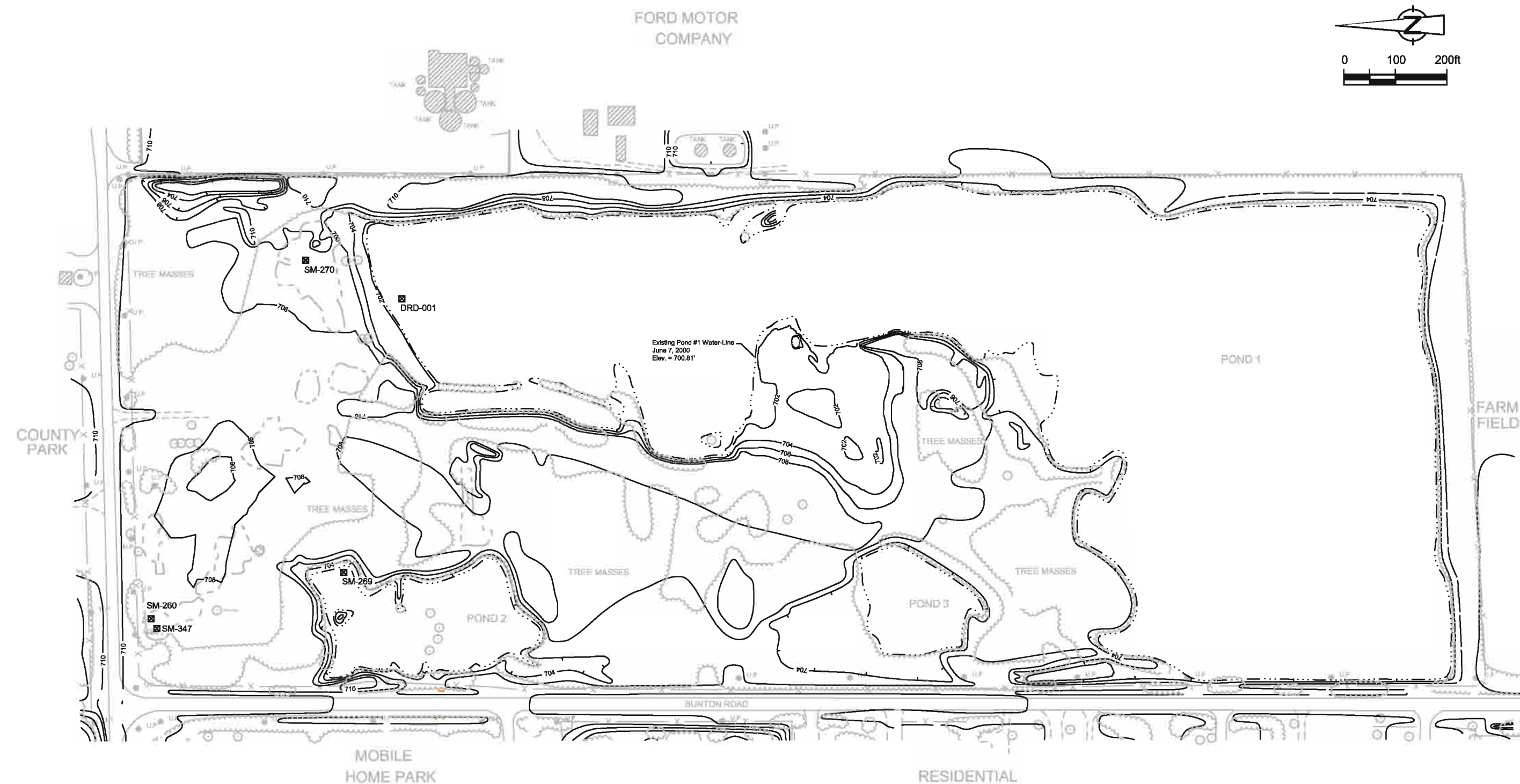


figure 5.4





SOURCES:
 ORIGINAL SURVEY: DARRELL HUGHES AND ASSOCIATES, APRIL 1993, FILE NO. 93092
 UPDATES: NOVA CONSULTANTS, INC., JUNE 2000, JULY 2000



04770-00(024)GN-WA009 AUG 11/2000

figure 5.5

SURFACE AND EXCAVATION WATER SAMPLE LOCATIONS
TEXTILE ROAD SITE
Washtenaw County, Michigan

TABLE 1.1

SUMMARY OF EOC SAMPLE RESULTS
 EXCEEDING APPLICABLE SOIL CRITERIA IN UPPER SAND/FILL UNIT
 REMOVAL ACTION CONSTRUCTION REPORT
 TEXTILE ROAD SITE,
 WASHTENAW COUNTY, MICHIGAN

Parameter	# Occurrences/ Analyses	Range (mg/kg)	Background		Direct Contact Criteria (3)		Site COC
			State Default	Site- Specific(2)	Generic	Generic	
					Residential (mg/kg)	Commercial Cat. IV (mg/kg)	
<u>Polychlorinated Biphenyls (PCBs)</u>							
Aroclor-1254 (1)	42/95	0.041-310	NA	NA	1.2	26	Yes
Aroclor-1260 (1)	10/95	0.044-24	NA	NA	1.2	26	Yes
<u>Volatile Organic Compounds (VOCs)</u>							
None							
<u>Inorganics</u>							
Arsenic	16/16	3.6J-65	5.8	9.6	6.6	330	No (4)

Notes:

- (1) - Parameter identified as COC in EOC Study Report.
 (2) - Site-Specific Background values as calculated and presented in EOC Study Report.
 (3) - Michigan Act 451, Part 201 Generic Cleanup Criteria, May 1999.
 (4) - Omitted from EOC Study Report COC list as naturally occurring constituent.

 - Exceeds associated soil cleanup level.

TABLE 1.2
SUMMARY OF EOC SAMPLE RESULTS
EXCEEDING APPLICABLE GROUNDWATER CRITERIA IN UPPER WATER TABLE ZONE
REMOVAL ACTION CONSTRUCTION REPORT
TEXTILE ROAD SITE,
WASHTENAW COUNTY, MICHIGAN

<i>Parameter</i>	<i># Occurrences/Analyses</i>		<i>Range</i>	<i>Background</i>	<i>Residential</i>	<i>Ind/Comm</i>	<i>GSI</i>	<i>Site</i>
	<i>Round 1</i>	<i>Round 2</i>	<i>(mg/L)</i>	<i>Site-Specific (2)</i>	<i>Drinking Water (3)</i>	<i>Drinking Water (3)</i>	<i>Criteria (3)</i>	<i>COC</i>
<u>PCBs</u>								
Aroclor-1254 (1)	1/6	1/6	0.0084-0.012	NA	0.0005	0.0005	IP	Yes
<u>VOCs</u>								
Acetone	4/6	8/6	0.014-1.7	NA	0.73	2.1	1.7	No (4)
Benzene (1)	1/6	1/6	0.002-0.003	NA	0.005	0.005	0.2	No
Vinyl Chloride (1)	1/6	1/6	0.009-0.014	NA	0.002	0.002	0.015	Yes
<u>BNAs</u>								
Benzo(k)fluoranthene (1)	1/6	--	0.005	NA	0.012	0.048	NA	No
Bis(2-ethylhexyl)phthalate	4/6	6/6	0.003JB-0.42B	NA	0.006	0.006	IP	No (4)
Phenanthrene	2/6	1/6	0.003J-0.011J	NA	0.026	0.075	0.005	Yes
<u>Inorganics (Filtered)</u>								
Beryllium	--	1/6	0.0053	0.0025	0.004	0.004	1.2	Yes
Iron	6/6	6/6	0.25-10	0.65	0.3	0.3	NA	Yes
Manganese (1)	6/6	6/6	0.020-0.82	0.106	0.05	0.05	NA	Yes

Notes:

- (1) - Parameter identified as COC in EOC Study Report.
(2) - Site-Specific Background values as calculated and presented in EOC Study Report.
(3) - Michigan Act 451, Part 201 Generic Cleanup Criteria, May 1999.
(4) - Omitted from EOC Study Report COC list as laboratory contaminant.
NV - No Value
ID - In Development

- Exceeds associated groundwater cleanup level.

TABLE 2.1

**SUMMARY OF REMOVAL ACTION ACTIVITIES
REMOVAL ACTION CONSTRUCTION REPORT
TEXTILE ROAD SITE
WASHTENAW COUNTY, MICHIGAN**

<i>Date</i>	<i>Description</i>
September 17, 1999	Formal bidding period for the Excavation and Off-Site disposal contract was initiated.
October 14, 1999	Carlo Environmental Technologies, Inc. (CET) of Clinton Township, Michigan was selected as the Removal Action Contractor.
October 19, 1999	Pre-mobilization meeting was held at CRA's Romulus, Michigan offices.
October 20, 1999	Filmed pre-existing Site conditions.
October 22, 1999	CET began mobilization activities to the Site.
October 28, 1999	CRA initiated background air monitoring.
October 30, 1999	CRA completed background air monitoring.
November 1, 1999	CET began clearing and grubbing activities and access road construction.
November 5, 1999	CET installed construction facilities and erosion control systems.
November 15, 1999	CET started taking borrow fill from east end of point to build berm in north end of Pond 1.
November 18, 1999	- Construction Progress Meeting No. 1 with representatives from U.S. EPA, the Group, CET and CRA. - The surface water control berm along the north end of Pond No. 1 completed.
November 19, 1999	- Started removing overburden and excavating at the Southeast corner of EA4. - Started excavating the east and west portions of EA1.
November 23, 1999	- Began hauling material from stockpile facility to Carleton Farms. - NOVA collected verification samples from EA1-E.
November 26, 1999	Continued excavating from EA1-W.
November 29, 1999	- Continued hauling material from stockpiles. - NOVA collected verification samples from EA1-W.
November 30, 1999	- Construction Progress Meetings No. 2 held with representatives from U.S. EPA, the Group, CET, and CRA. - Continued excavating non-TSCA material from EA4.
December 1, 1999	Began excavation and disposal of TSCA material from EA4 to WD.

TABLE 2.1

**SUMMARY OF REMOVAL ACTION ACTIVITIES
REMOVAL ACTION CONSTRUCTION REPORT
TEXTILE ROAD SITE
WASHTENAW COUNTY, MICHIGAN**

<i>Date</i>	<i>Description</i>
December 2, 1999	• CET began excavating EA3. • NOVA initiated verification sampling in EA4.
December 3, 1999	• CET excavated TSCA material from the center floor of EA1-W.
December 7, 1999	• Construction Progress Meeting No. 3 with representatives from U.S. EPA, the Group, CET and CRA. • Started backfilling EA1E following confirmatory sampling with borrow area material.
December 8, 1999	• Excavated TSCA hot spots in EA4. • Conducted verification sampling in EA4.
December 10, 1999	• NOVA conducted verification sampling in EA4. • Two drums excavated in EA3 in the east area, north side – one full of a black solid, obsidian appearing material, petroleum odor. The second drum had similar material, open ended labeled “potassium cyanide” in the yellow band circling drum, and skull and crossbones on side. Both drums were placed on stockpile area and covered visqueen.
December 11, 1999	• Some oil was encountered in the northwest portion of EA3-NW. The oil was tested and determined to contain PCBs at 57 ppm. CET collected the oil and stored the material in drums pending disposal. • Continued excavation in EA1-W from the floor.
December 13, 1999	• CET began dewatering EA4 for backfilling portions of the excavation.
December 14, 1999	• Construction Progress Meeting No. 4 with representatives from the Group, CET and CRA.
December 16, 1999	• Continued excavation in EA3-SE and EA3-NE.
December 18, 1999	• Finished excavating floors and walls in EA4. • Finished excavating EA3-SE.
December 20, 1999	• CET began discharging water collected from Site excavations from the on-Site water treatment system to Pond No. 2.

TABLE 2.1

**SUMMARY OF REMOVAL ACTION ACTIVITIES
REMOVAL ACTION CONSTRUCTION REPORT
TEXTILE ROAD SITE
WASHTENAW COUNTY, MICHIGAN**

<i>Date</i>	<i>Description</i>
December 21, 1999	• Construction Progress Meeting No. 5 with representatives from U.S. EPA, the Group, CET and CRA. • Excavation of material from EA4 was substantially completed. CET began backfilling portions of EA4, which were verified to meet the cleanup criteria. • Additional excavation in EA2 initiated based on verification sample results.
December 22, 1999	• A second frac truck arrived and placed within containment area to expand water treatment capacity. • CET pumped water from EA4 for backfilling.
December 23, 1999	• CET shut down for holiday season.
December 29, 1999	• NOVA collected verification samples from various excavations.
January 3, 2000	• CET resumed Site activities following shutdown. • Excavation in EA1, EA2, and EA3 continued. EA1 was expanded to include an additional area to the south of EA1-W. EA2 was expanded to the northwest toward EA1 to remove filter cloth and suspect material. Oil encounter in EA2 containing 190 ppm PCBs. Oil Removal by CET for off-Site disposal. • Excavation in EA5 was initiated. The material was either stockpiled for sampling or used as backfill material in portions of EA3.
January 4, 2000	• Construction Progress Meeting No. 6 with representatives from U.S. EPA, the Group, CET and CRA. • NOVA continued verification sampling from various excavations.
January 5, 2000	• CET set up drum vac in EA3-NW to remove additional oil which had been encountered.
January 7, 2000	• NOVA collecting VOC / SVOCs verification samples from EA2 and EA4. • Excavated floor of EA3-SW based on VOC / SVOC verification results. • Continued excavation of walls in EA2 to northwest. Found drums, most of which were dry, rusted, crushed, and open-ended. A few drums were wet, oily and open-ended. The soil was observed to contain oil and with petroleum odor.

TABLE 2.1

**SUMMARY OF REMOVAL ACTION ACTIVITIES
REMOVAL ACTION CONSTRUCTION REPORT
TEXTILE ROAD SITE
WASHTENAW COUNTY, MICHIGAN**

<i>Date</i>	<i>Description</i>
January 10, 1999	- CET conducted additional backfilling of EA4 with material from borrow area. CET also staged borrow fill near EA1 excavations for backfilling. - NOVA collected verification samples and surveyed points from EA2, EA3 and EA4.
January 11, 2000	- Construction Progress Meeting No. 7 with representatives from U.S. EPA, the Group, MDEQ-SWQD, CET, and CRA. - NOVA collected verification samples from EA3-SW floors.
January 12, 2000	- Excavated EA3-NW walls. Excavated where black material was in north half and placed the material in a small TSCA pile. Observed oily gravel at water table with petroleum odor. - Continued excavation from EA5.
January 13, 2000	- NOVA conducted verification sampling in EA5. - CET continued sampling and treatment of water collected from excavations.
January 17, 2000	EA3-NW was expanded via test pits and further excavated to determine the extent of free product observed in the excavation based on U.S. EPA schedule extension.
January 18, 2000	- Construction Meeting No. 8 with representatives <u>from</u> U.S. EPA, the Group, CET, and CRA. Deleted: form - Excavated test trenches south of EA1 and encountered small amounts of oily black cloth, strong petroleum odor, sprocket chains, cans and other debris.
January 20, 2000	- Excavated material from test trenches south of EA1-W (new excavation area EA1-S). - CET began pumping water from EA1-W for backfilling. - NOVA collected verification samples from various excavations.
January 21, 2000	No Site activity due to cold weather.
January 24, 2000	- CET started excavating hot spots for north wall of EA1-S. - NOVA collected verification samples from EA2 and EA1-S.

TABLE 2.1

**SUMMARY OF REMOVAL ACTION ACTIVITIES
REMOVAL ACTION CONSTRUCTION REPORT
TEXTILE ROAD SITE
WASHTENAW COUNTY, MICHIGAN**

<i>Date</i>	<i>Description</i>
January 25, 2000	• CET crew not on-Site due to cold. • NOVA finished verification sampling from EA1, EA2 and EA5, and surveyed.
January 27, 2000	• CET crew not on-Site due to cold weather.
January 31, 2000	• Additional excavation conducted to remove oily material and hot spots identified through verification sampling and investigation in EA3-NW. • CET backfilled EA3-NE and EA3-SE up to ground surface.
February 1, 2000	• Construction Progress Meeting No. 9 with representatives from U.S. EPA, the Group, CET, and CRA. • CET completed excavation in EA5. • Excavated in EA1-S where area of TSCA were identified from verification sampling. • Excavated 3 test pits near EA3-NW to further identify extent of oily material.
February 2, 2000	• Completed excavation in EA2. • Periodic excavation continued in the southern portion of EA1-S. • NOVA resampled EA1 and EA2 areas that were previously above criteria.
February 3, 2000	• Continued excavation in EA3-NW to remove oil material. • Backfilled EA2 using material from borrow area.
February 4, 2000	• CET off-Site for the day for their 8 hour OSHA refreshers.
February 7, 2000	• CET backfilled EA2 and EA5 using material from borrow area.
February 8, 2000	• CET finished excavation in EA3 -NW. All oil observed in EA3 was collected and placed in 55-gallon drums for off-Site disposal as TSCA PCB liquid. Final verification sampling was conducted.
February 9, 2000	• Three test pits were excavated in the vicinity of EA1-S to confirm that additional excavation was not required.
February 11, 2000	• Checked EA3-NW and found no new oil present.
February 14, 2000	• CET began grading EA4 using some borrow material.

TABLE 2.1

**SUMMARY OF REMOVAL ACTION ACTIVITIES
REMOVAL ACTION CONSTRUCTION REPORT
TEXTILE ROAD SITE
WASHTENAW COUNTY, MICHIGAN**

<i>Date</i>	<i>Description</i>
February 15, 2000	- Construction Progress Meeting No. 10 with representatives from U.S. EPA, the Group, CET, and CRA. - CET began backfilling EA1-S and EA3-NW. - CET began removal of the soil stockpile facility following the receipt of the results for PCB soil sampled collected by CRA. The PCB samples ranged from non-detected to 36 mg/kg and therefore the soil was sent off-Site for disposal at Carleton Farms Landfill.
February 16, 2000	- Stockpile facility removal complete. - CET brought sand up from borrow area to finish backfilling EA1-S.
February 17, 2000	Dewatered and backfilled EA3-NW. Observed no new oil in excavation.
February 18, 2000	U.S. EPA and CET trailers were removed from Site.
February 21, 2000	CET continued demobilization activities during the weeks of February 21, 2000 to March 7, 2000, including decontamination of equipment, removal of carbon from the water treatment system for off-Site disposal, removal of Site trailers, and removal of equipment no longer required at the Site.
February 23, 2000	Backfilling of remaining excavation EA3-NW completed.
February 24, 2000	CET crew not on-Site. Ground was too wet to haul from the borrow area for consolidation area cover.
February 25, 2000	CET demobilized excavator.
February 29, 2000	ProAct on-Site to use vac system to drum vac carbon out of vessels from treatment system.
March 28, 2000	- CET returned to the Site to complete the fine grading activities and placement of six inches of clean borrow area material in the vicinity of the consolidated area and to place 6-8 inches of imported topsoil over the consolidation area. - CET continued closeout activities including demolition of the Site building and removal of miscellaneous Site debris. - Twenty drums of carbon removed from the water treatment system were removed for disposal at WD.
April 24, 2000	During the week of April 24, 2000, CET completed placement of the seed over the consolidation area and spread wood chips to prevent erosion.

TABLE 2.1

SUMMARY OF REMOVAL ACTION ACTIVITIES
REMOVAL ACTION CONSTRUCTION REPORT
TEXTILE ROAD SITE
WASHTENAW COUNTY, MICHIGAN

<i>Date</i>	<i>Description</i>
June 1, 2000	• Site inspection with representatives of U.S. EPA, E&E, the Group, CET and CRA.
June 23, 2000	• CRA and Altech on-Site to install monitoring wells and conduct monitoring well abandonment.
June 26, 2000	• Monitoring well abandonment and installation complete.
June 27, 2000	• CET and Group initiate Site maintenance.

TABLE 4.1

**ORGANIC VAPOR AND PARTICULATE AIR MONITORING RESULTS
REMOVAL ACTION CONSTRUCTION REPORT
TEXTILE ROAD SITE
WASHTENAW COUNTY, MICHIGAN**

Date	Time	Upwind Location		Downwind Location No. 1		Downwind Location No. 2		Work Zone Action Level	
		Organic Vapor (ppm)	Respirable Dust (mg/m ³)	Organic Vapor (ppm)	Respirable Dust (mg/m ³)	Organic Vapor (ppm)	Respirable Dust (mg/m ³)	Organic Vapor (ppm)	Respirable Dust (mg/m ³)
11/11/99	10:30 AM	0.0	0.02	0.0	0.00	0.0	0.00	10	2.5
	3:00 PM	0.0	0.02	0.0	0.02	0.0	0.00	10	2.5
11/12/99	10:30 AM	0.0	0.02	0.0	0.00	0.0	0.00	10	2.5
11/15/99	1:30 PM	0.0	0.00	0.0	0.00	0.0	0.00	10	2.5
	4:30 PM	0.0	0.00	0.0	0.00	0.0	0.05-0.12	10	2.5
11/16/99	8:30 AM	0.0	0.02	0.0	0.00	0.0	0.09	10	2.5
	4:10 PM	0.0	0.03	0.0	0.02	0.0	0.03-0.11	10	2.5
11/17/99	4:30 PM	0.0	0.00	0.0	0.02	0.0	0.02	10	2.5
11/18/99	7:30 AM	0.0	0.00	0.0	0.00	0.0	0.00	10	2.5
11/19/99	9:50 AM	0.0	0.08-0.21	0.0	0.19-0.21	0.0	0.19-0.21	10	2.5
11/20/99	7:00 AM	0.0	0.00-0.02	0.0	0.02	0.0	0.00	10	2.5
	2:45 PM	0.0	0.00	0.0	0.00-0.02	0.0	0.00-0.02	10	2.5
11/22/99	3:00 PM	0.0	0.02	0.0	0.02-0.08	0.0	0.00	10	2.5
11/23/99	2:30 PM	1.6	0.04	0.00-0.90	0.08-0.12	0.8	0.02	10	2.5
11/24/99	4:00 PM	0.0	0.00	0.0	0.02	0.0	0.02-0.04	10	2.5
11/26/99	Rain, no monitoring conducted								
11/30/99	4:00 PM	0.0	0.02-0.08	0.0	0.00-0.02	0.0	0.00-0.02	10	2.5
12/01/99	11:15 AM	0.0	0.02-0.08	0.0	0.02-0.08	0.0	0.02-0.08	10	2.5
12/02/99	9:30 AM	0.0	0.02-0.06	0.0	0.02-0.06	0.0	0.02-0.06	10	2.5
	11:25 AM	0.0	0.02-0.00	0.0	0.08-0.00	0.0	0.02-0.04	10	2.5
12/03/99	12:00 PM	0.0	0.08-0.10	0.0	0.08-0.10	0.0	0.08-0.10	10	2.5
12/04/99	1:30 PM	1.8-2.1 ⁽¹⁾	0.08-0.12	1.8-2.1 ⁽¹⁾	0.08-0.12	1.8-2.1 ⁽¹⁾	0.08-0.12	10	2.5
12/06/99	12:00 PM	0.0-1.8	0.00-0.02	0.0-1.8	0.02	0.0-1.8	0.00-0.02	10	2.5
12/08/99	2:00 PM	0.0	0.00-0.02	0.0	0.02-0.04	0.0	0.02	10	2.5
12/09/99	10:30 AM	0.0	0.00	0.0	0.02	0.0	0.02	10	2.5
12/11/99	12:00 PM	0.0	0.00	0.0	0.00	0.0	0.00	10	2.5
12/15/99	7:30 AM	0.0	0.00	0.0	0.02	0.0	0.00	10	2.5
12/16/99	12:00 PM	0.0	0.00	0.0	0.02-0.00	0.0	0.00	10	2.5
12/17/99	12:00 PM	0.0	0.00	0.0	0.00-0.02	0.0	0.00	10	2.5
12/18/99	3:00 PM	0.0-1.2	0.02-0.00	0.0-1.2	0.00	0.0-1.2	0.02-0.00	10	2.5
12/20/99	1:00 PM	0.0	0.00	0.0	0.00-0.02	0.0	0.00	10	2.5
12/21/99	12:00 PM	1.1	0.00	0.8	0.00-0.02	1.1	0.02-0.00	10	2.5

TABLE 4.1

**ORGANIC VAPOR AND PARTICULATE AIR MONITORING RESULTS
REMOVAL ACTION CONSTRUCTION REPORT
TEXTILE ROAD SITE
WASHTENAW COUNTY, MICHIGAN**

Date	Time	Upwind Location		Downwind Location No. 1		Downwind Location No. 2		Work Zone Action Level	
		Organic Vapor (ppm)	Respirable Dust (mg/m ³)	Organic Vapor (ppm)	Respirable Dust (mg/m ³)	Organic Vapor (ppm)	Respirable Dust (mg/m ³)	Organic Vapor (ppm)	Respirable Dust (mg/m ³)
12/23/99	10:45 AM	0.0-1.2	0.00-0.02	0.0-1.2	0.00	0.0-1.2	0.00	10	2.5
01/03/00	Rain, no monitoring conducted							10	2.5
01/04/00	AM	0.0	0.00	0.0	0.00	0.0	0.00	10	2.5
01/07/00	12:00 PM	Heavy Snow Flurries, no monitoring conducted					10	2.5	
01/13/00	2:00 PM	0.0	0.00	0.0	0.00	0.0	0.00	10	2.5
01/18/00	5:00 PM	0.0	0.00	0.0	0.00	0.0	0.00	10	2.5
01/24/00	12:00 PM	(2)	0.00-0.07	(2)	0.00-0.05	(2)	0.00-0.05	10	2.5
01/28/00	AM	0.0	0.00-0.02	0.0	0.00-0.02	0.0	0.00-0.02	10	2.5
	PM	0.0	0.00-0.02	0.0	0.00-0.02	0.0	0.00-0.02	10	2.5
01/31/00	AM	0.0	0.00	0.0	0.00-0.02	0.0	0.00	10	2.5
	PM	0.0	0.00	0.0	0.00	0.0	0.00-0.02	10	2.5

Notes:

- (1) - Background readings taken in trailer at 1.1 ppm, therefore data is suspect.
 (2) - PID malfunctioned, no reading taken.

TABLE 4.2

**PCB AIR MONITORING WEATHER CONDITIONS
REMOVAL ACTION CONSTRUCTION REPORT
TEXTILE ROAD SITE
WASHTENAW COUNTY, MICHIGAN**

<i>Date</i>	<i>Temperature (° F)</i>			<i>Precipitation (inches)</i>	<i>Wind Speed (mph)</i>	<i>Wind Direction</i>
	<i>Low</i>	<i>High</i>	<i>Average</i>			
10/27/95 ⁽¹⁾	28.9	73.9	50	NA	4 - 19	SE - SSW
10/28/95 ⁽¹⁾	39	73	59	NA	4 - 5	NNE - SSE
10/29/95 ⁽¹⁾	28.9	75	56	NA	4 - 23	SSW
11/17/95	24.1	57	44.3	Trace	4 - 12	S - SW
11/18/95	39	62.1	49.2	0.03	9 - 13	WSW - SSW
11/21/95	37.9	64	54.8	0.12	4 - 14	WSW - SSW
11/22/95	46.9	66.9	55.6	0.12	6 - 14	SE - SSW
11/28/95	23	39	30.5	NA	5 - 18	WNW - NNW
11/29/95	19	35.1	25.1	NA	3 - 10	NW - SE
11/30/95	17.1	37.9	33.5	NA	8 - 14	SSW - S
12/01/95	34	50	43.1	NA	6 - 10	SSE - S
12/02/95	48	51.1	49.6	NA	11 - 14	SSW - SW

Notes:

(1) - Days where Background Sampling was Conducted

NA - Precipitation Information Not Available

TABLE 4.3

**PCB AIR MONITORING RESULTS
REMOVAL ACTION CONSTRUCTION REPORT
TEXTILE ROAD SITE
WASHTENAW COUNTY, MICHIGAN**

<i>Sample Stop Date</i>	<i>Sample ID</i>		<i>Location</i>	<i>Unit</i>	<i>Start</i>		<i>Stop</i>		<i>Sample Duration</i>		<i>Average Flow Rate (m³/min)</i>	<i>Total Volume (m³)</i>
					<i>Date</i>	<i>Time</i>	<i>Date</i>	<i>Time</i>	<i>(hrs:mins)</i>	<i>(minutes)</i>		
10/29/99	A-4770-102899-SM-001	(1)	North	Unit 5	10/28/99	17:00	10/29/99	17:02	24:02	1442	0.24	343
10/29/99	A-4770-102899-SM-002	(1)	West	Unit 7	10/28/99	17:11	10/29/99	17:15	24:04	1444	0.25	354
10/29/99	A-4770-102899-SM-003	(1)	East	Unit 9	10/28/99	17:25	10/29/99	17:25	24:00	1440	0.23	336
10/30/99	A-4770-102999-SM-004	(1)	North	Unit 5	10/29/99	17:15	10/29/99	17:15	24:00	1440	0.24	342
10/30/99	A-4770-102999-SM-005	(1)	West	Unit 7	10/29/99	17:20	10/29/99	17:20	24:00	1440	0.24	348
10/30/99	A-4770-102999-SM-006	(1)	East	Unit 9	10/29/99	17:30	10/29/99	17:35	24:05	1445	0.24	340
10/30/99	A-4770-102999-SM-007	(1)	East Duplicate	Unit 3	10/29/99	17:35	10/29/99	17:40	24:05	1445	0.22	314
10/31/99	A-4770-103099-SM-008	(1)	North	Unit 5	10/30/99	17:20	10/31/99	17:20	24:00	1440	0.24	348
10/31/99	A-4770-103099-SM-009	(1)	West	Unit 7	10/30/99	17:25	10/31/99	17:30	24:05	1445	0.24	347
10/31/99	A-4770-103099-SM-010	(1)	East	Unit 9	10/30/99	17:35	10/31/99	17:40	24:05	1445	0.24	344
11/19/99	A-4770-111899-SM-013		West	Unit 5	11/18/99	16:00	11/19/99	16:15	24:15	1455	0.25	357
11/19/99	A-4770-111899-SM-014		Center	Unit 7	11/18/99	16:10	11/19/99	16:25	24:15	1455	0.24	354
11/19/99	A-4770-111899-SM-015		East	Unit 9	11/18/99	16:20	11/19/99	16:30	24:10	1450	0.24	349
11/19/99	A-4770-111899-SM-016		FB	NA	11/18/99	16:10	11/19/99	16:25	24:15	1455	0.24	355
11/20/99	A-4770-111999-SM-019		West	Unit 5	11/19/99	16:20	11/20/99	16:00	23:40	1420	0.24	346
11/20/99	A-4770-111999-SM-020		Center	Unit 7	11/19/99	16:30	11/20/99	16:20	23:50	1430	0.24	345
11/20/99	A-4770-111999-SM-021		East	Unit 9	11/19/99	16:35	11/20/99	16:30	23:55	1435	0.24	344
11/20/99	A-4770-111999-SM-022		East Duplicate	Unit 3	11/19/99	16:40	11/20/99	16:35	23:55	1435	0.23	334
11/23/99	A-4770-112299-SM-025		West	Unit 5	11/22/99	16:00	11/23/99	16:00	24:00	1440	0.24	350
11/23/99	A-4770-112299-SM-026		Center	Unit 7	11/22/99	16:15	11/23/99	16:20	24:05	1445	0.24	349
11/23/99	A-4770-112299-SM-027		East	Unit 9	11/22/99	16:25	11/23/99	16:30	24:05	1445	0.24	345
11/23/99	A-4770-112299-SM-028		FB	NA	11/22/99	16:15	11/23/99	16:15	24:00	1440	0.24	349

TABLE 4.3

**PCB AIR MONITORING RESULTS
REMOVAL ACTION CONSTRUCTION REPORT
TEXTILE ROAD SITE
WASHTENAW COUNTY, MICHIGAN**

Sample Stop Date	Sample ID	Location	Unit	<i>Polychlorinated Biphenyls (PCBs) Concentration ($\mu\text{g}/\text{m}^3$)</i>							Total PCB Conc. (2) ($\mu\text{g}/\text{m}^3$)	Action Level ($\mu\text{g}/\text{m}^3$)
				Aroclor 1016	Aroclor 1221	Aroclor 1232	Aroclor 1242	Aroclor 1248	Aroclor 1254	Aroclor 1260		
10/29/99	A-4770-102899-SM-001	⁽¹⁾ North	Unit 5	(0.0022)	(0.0022)	(0.0022)	(0.0022)	(0.0022)	(0.0022)	(0.0022)	(0.0088)	1200
10/29/99	A-4770-102899-SM-002	⁽¹⁾ West	Unit 7	(0.0021)	(0.0021)	(0.0021)	(0.0021)	(0.0021)	(0.0021)	(0.0021)	(0.0084)	1200
10/29/99	A-4770-102899-SM-003	⁽¹⁾ East	Unit 9	(0.0022)	(0.0022)	(0.0022)	(0.0022)	(0.0022)	(0.0022)	(0.0022)	(0.0088)	1200
10/30/99	A-4770-102999-SM-004	⁽¹⁾ North	Unit 5	(0.0022)	(0.0022)	(0.0022)	(0.0022)	(0.0022)	(0.0022)	(0.0022)	(0.0088)	1200
10/30/99	A-4770-102999-SM-005	⁽¹⁾ West	Unit 7	(0.0022)	(0.0022)	(0.0022)	(0.0022)	(0.0022)	(0.0022)	(0.0022)	(0.0088)	1200
10/30/99	A-4770-102999-SM-006	⁽¹⁾ East	Unit 9	(0.0022)	(0.0022)	(0.0022)	(0.0022)	(0.0022)	(0.0022)	(0.0022)	(0.0088)	1200
10/30/99	A-4770-102999-SM-007	⁽¹⁾ East Duplicate	Unit 3	(0.0024)	(0.0024)	(0.0024)	(0.0024)	(0.0024)	(0.0024)	(0.0024)	(0.0096)	1200
10/31/99	A-4770-103099-SM-008	⁽¹⁾ North	Unit 5	(0.0022)	(0.0022)	(0.0022)	(0.0022)	(0.0022)	(0.0022)	(0.0022)	(0.0088)	1200
10/31/99	A-4770-103099-SM-009	⁽¹⁾ West	Unit 7	(0.0022)	(0.0022)	(0.0022)	(0.0022)	(0.0022)	(0.0022)	(0.0022)	(0.0088)	1200
10/31/99	A-4770-103099-SM-010	⁽¹⁾ East	Unit 9	(0.0022)	(0.0022)	(0.0022)	(0.0022)	(0.0022)	(0.0022)	(0.0022)	(0.0088)	1200
11/19/99	A-4770-111899-SM-013	West	Unit 5	(0.0021)	(0.0021)	(0.0021)	(0.0021)	(0.0021)	(0.0021)	(0.0021)	(0.0084)	1,200
11/19/99	A-4770-111899-SM-014	Center	Unit 7	(0.0021)	(0.0021)	(0.0021)	(0.0021)	(0.0021)	(0.0021)	(0.0021)	(0.0084)	1,200
11/19/99	A-4770-111899-SM-015	East	Unit 9	(0.0021)	(0.0021)	(0.0021)	(0.0021)	(0.0021)	0.0049	(0.0021)	0.0049	1,200
11/19/99	A-4770-111899-SM-016	FB	NA	(0.0021)	(0.0021)	(0.0021)	(0.0021)	(0.0021)	(0.0021)	(0.0021)	(0.0084)	1,200
11/20/99	A-4770-111999-SM-019	West	Unit 5	(0.0022)	(0.0022)	(0.0022)	(0.0022)	(0.0022)	(0.0022)	(0.0022)	(0.0088)	1,200
11/20/99	A-4770-111999-SM-020	Center	Unit 7	(0.0022)	(0.0022)	(0.0022)	(0.0022)	(0.0022)	(0.0022)	(0.0022)	(0.0088)	1,200
11/20/99	A-4770-111999-SM-021	East	Unit 9	(0.0022)	(0.0022)	(0.0022)	(0.0022)	(0.0022)	0.0028	(0.0022)	0.0028	1,200
11/20/99	A-4770-111999-SM-022	East Duplicate	Unit 3	(0.0022)	(0.0022)	(0.0022)	(0.0022)	(0.0022)	(0.0022)	(0.0022)	(0.0088)	1,200
11/23/99	A-4770-112299-SM-025	West	Unit 5	(0.0021)	(0.0021)	(0.0021)	(0.0021)	(0.0021)	(0.0021)	(0.0021)	(0.0084)	1,200
11/23/99	A-4770-112299-SM-026	Center	Unit 7	(0.0021)	(0.0021)	(0.0021)	(0.0021)	(0.0021)	(0.0021)	(0.0021)	(0.0084)	1,200
11/23/99	A-4770-112299-SM-027	East	Unit 9	(0.0022)	(0.0022)	(0.0022)	(0.0022)	(0.0022)	0.0032	(0.0022)	0.0032	1,200
11/23/99	A-4770-112299-SM-028	FB	NA	(0.0022)	(0.0022)	(0.0022)	(0.0022)	(0.0022)	(0.0022)	(0.0022)	(0.0088)	1,200

TABLE 4.3
PCB AIR MONITORING RESULTS
REMOVAL ACTION CONSTRUCTION REPORT
TEXTILE ROAD SITE
WASHTENAW COUNTY, MICHIGAN

<i>Sample Stop Date</i>	<i>Sample ID</i>	<i>Location</i>	<i>Unit</i>	<i>Start</i>		<i>Stop</i>		<i>Sample Duration</i>		<i>Average Flow Rate (m³/min)</i>	<i>Total Volume (m³)</i>
				<i>Date</i>	<i>Time</i>	<i>Date</i>	<i>Time</i>	<i>(hrs:mins)</i>	<i>(minutes)</i>		
11/24/99	A-4770-112399-SM-040	West	Unit 5	11/23/99	14:20	11/24/99	15:00	24:40	1480	0.24	360
11/24/99	A-4770-112399-SM-041	Center	Unit 7	11/23/99	14:30	11/24/99	15:10	24:40	1480	0.24	357
11/24/99	A-4770-112399-SM-042	East	Unit 9	11/23/99	14:40	11/24/99	15:20	24:30	1470	0.24	352
11/24/99	A-4770-112399-SM-043	East Duplicate	Unit 3	11/23/99	14:45	11/24/99	15:25	24:40	1480	0.24	349
11/30/99	A-4770-113099-SM-057	West	Unit 5	11/29/99	14:50	12/01/99	15:00	24:50	1490	0.24	364
11/30/99	A-4770-113099-SM-058	Center	Unit 7	11/29/99	14:55	12/01/99	15:15	24:20	1460	0.24	352
11/30/99	A-4770-113099-SM-059	East	Unit 9	11/29/99	15:10	12/01/99	15:30	24:20	1460	0.24	352
11/30/99	A-4770-113099-SM-060	FB	NA	11/29/99	15:00	12/01/99	15:15	24:15	1455	0.24	353
12/01/99	A-4770-120199-SM-076	West	Unit 5	11/30/99	15:15	12/01/99	16:00	24:45	1485	0.24	362
12/01/99	A-4770-120199-SM-077	Center	Unit 7	11/30/99	15:30	12/01/99	16:10	24:40	1480	0.24	355
12/01/99	A-4770-120199-SM-078	East	Unit 9	11/30/99	15:45	12/01/99	16:25	24:40	1480	0.24	356
12/01/99	A-4770-120199-SM-079	East Duplicate	Unit 3	11/30/99	15:55	12/01/99	16:30	24:35	1475	0.24	349
12/02/99	A-4770-120299-SM-096	West	Unit 5	12/01/99	16:10	12/02/99	16:00	23:50	1430	0.25	351
12/02/99	A-4770-120299-SM-097	Center	Unit 7	12/01/99	16:15	12/02/99	16:10	23:55	1435	0.24	351
12/02/99	A-4770-120299-SM-098	East	Unit 9	12/01/99	16:30	12/02/99	16:25	23:55	1435	0.24	346
12/02/99	A-4770-120299-SM-099	FB	NA	12/01/99	16:15	12/02/99	16:10	23:55	1435	0.24	351
12/03/99	A-4770-120399-SM-101	West	Unit 5	12/02/99	16:05	12/03/99	16:15	24:10	1450	0.24	351
12/03/99	A-4770-120399-SM-102	Center	Unit 7	12/02/99	16:15	12/03/99	16:25	24:10	1450	0.24	352
12/03/99	A-4770-120399-SM-103	East	Unit 9	12/02/99	16:25	12/03/99	16:35	24:10	1450	0.24	350
12/03/99	A-4770-120399-SM-104	FB	NA	12/02/99	16:20	12/03/99	16:20	24:00	1440	0.24	351
12/04/99	A-4770-120499-SM-105	West	Unit 5	12/03/99	16:20	12/04/99	14:00	21:40	1300	0.24	318
12/04/99	A-4770-120499-SM-106	Center	Unit 7	12/03/99	16:30	12/04/99	14:05	21:25	1285	0.24	311
12/04/99	A-4770-120499-SM-107	East	Unit 9	12/03/99	16:40	12/04/99	14:15	21:25	1285	0.24	311
12/04/99	A-4770-120499-SM-108	East Duplicate	Unit 3	12/03/99	16:45	12/04/99	14:20	21:25	1285	0.24	308

TABLE 4.3

**PCB AIR MONITORING RESULTS
REMOVAL ACTION CONSTRUCTION REPORT
TEXTILE ROAD SITE
WASHTENAW COUNTY, MICHIGAN**

Sample Stop Date	Sample ID	Location	Unit	Aroclor 1016	Polychlorinated Biphenyls (PCBs) Concentration (µg/m ³)						Total PCB Conc. (2) (µg/m ³)	Action Level (µg/m ³)
					Aroclor 1221	Aroclor 1232	Aroclor 1242	Aroclor 1248	Aroclor 1254	Aroclor 1260		
11/24/99	A-4770-112399-SM-040	West	Unit 5	(0.0021)	(0.0021)	(0.0021)	(0.0021)	(0.0021)	(0.0021)	(0.0021)	(0.0084)	1,200
11/24/99	A-4770-112399-SM-041	Center	Unit 7	(0.0021)	(0.0021)	(0.0021)	(0.0021)	(0.0021)	(0.0021)	(0.0021)	(0.0084)	1,200
11/24/99	A-4770-112399-SM-042	East	Unit 9	(0.0021)	(0.0021)	(0.0021)	(0.0021)	(0.0021)	0.0037	(0.0021)	0.0037	1,200
11/24/99	A-4770-112399-SM-043	East Duplicate	Unit 3	(0.0022)	(0.0022)	(0.0022)	(0.0022)	(0.0022)	(0.0022)	(0.0022)	(0.0088)	1,200
11/30/99	A-4770-113099-SM-057	West	Unit 5	(0.0021)	(0.0021)	(0.0021)	(0.0021)	(0.0021)	(0.0021)	(0.0021)	(0.0084)	1,200
11/30/99	A-4770-113099-SM-058	Center	Unit 7	(0.0021)	(0.0021)	(0.0021)	(0.0021)	(0.0021)	(0.0021)	(0.0021)	(0.0084)	1,200
11/30/99	A-4770-113099-SM-059	East	Unit 9	(0.0021)	(0.0021)	(0.0021)	(0.0021)	(0.0021)	(0.0021)	(0.0021)	(0.0084)	1,200
11/30/99	A-4770-113099-SM-060	FB	NA	(0.0021)	(0.0021)	(0.0021)	(0.0021)	(0.0021)	(0.0021)	(0.0021)	(0.0084)	1,200
12/01/99	A-4770-120199-SM-076	West	Unit 5	(0.0021)	(0.0021)	(0.0021)	(0.0021)	(0.0021)	(0.0021)	(0.0021)	(0.0084)	1,200
12/01/99	A-4770-120199-SM-077	Center	Unit 7	(0.0021)	(0.0021)	(0.0021)	(0.0021)	(0.0021)	(0.0021)	(0.0021)	(0.0084)	1,200
12/01/99	A-4770-120199-SM-078	East	Unit 9	(0.0021)	(0.0021)	(0.0021)	(0.0021)	(0.0021)	(0.0021)	(0.0021)	(0.0084)	1,200
12/01/99	A-4770-120199-SM-079	East Duplicate	Unit 3	(0.0022)	(0.0022)	(0.0022)	(0.0022)	(0.0022)	(0.0022)	(0.0022)	(0.0088)	1,200
12/02/99	A-4770-120299-SM-096	West	Unit 5	(0.0021)	(0.0021)	(0.0021)	(0.0021)	(0.0021)	(0.0021)	(0.0021)	(0.0084)	1,200
12/02/99	A-4770-120299-SM-097	Center	Unit 7	(0.0021)	(0.0021)	(0.0021)	(0.0021)	(0.0021)	(0.0021)	(0.0021)	(0.0084)	1,200
12/02/99	A-4770-120299-SM-098	East	Unit 9	(0.0022)	(0.0022)	(0.0022)	(0.0022)	(0.0022)	(0.0022)	(0.0022)	(0.0088)	1,200
12/02/99	A-4770-120299-SM-099	FB	NA	(0.0021)	(0.0021)	(0.0021)	(0.0021)	(0.0021)	(0.0021)	(0.0021)	(0.0084)	1,200
12/03/99	A-4770-120399-SM-101	West	Unit 5	(0.0021)	(0.0021)	(0.0021)	(0.0021)	(0.0021)	(0.0021)	(0.0021)	(0.0084)	1,200
12/03/99	A-4770-120399-SM-102	Center	Unit 7	(0.0021)	(0.0021)	(0.0021)	(0.0021)	(0.0021)	(0.0021)	(0.0021)	(0.0084)	1,200
12/03/99	A-4770-120399-SM-103	East	Unit 9	(0.0021)	(0.0021)	(0.0021)	(0.0021)	(0.0021)	0.0049	(0.0021)	0.0049	1,200
12/03/99	A-4770-120399-SM-104	FB	NA	(0.0021)	(0.0021)	(0.0021)	(0.0021)	(0.0021)	(0.0021)	(0.0021)	(0.0084)	1,200
12/04/99	A-4770-120499-SM-105	West	Unit 5	(0.0024)	(0.0024)	(0.0024)	(0.0024)	(0.0024)	(0.0024)	(0.0024)	(0.0096)	1,200
12/04/99	A-4770-120499-SM-106	Center	Unit 7	(0.0024)	(0.0024)	(0.0024)	(0.0024)	(0.0024)	(0.0024)	(0.0024)	(0.0096)	1,200
12/04/99	A-4770-120499-SM-107	East	Unit 9	(0.0024)	(0.0024)	(0.0024)	(0.0024)	(0.0024)	0.0090	(0.0024)	0.0090	1,200
12/04/99	A-4770-120499-SM-108	East Duplicate	Unit 3	(0.0024)	(0.0024)	(0.0024)	(0.0024)	(0.0024)	(0.0024)	(0.0024)	(0.0096)	1,200

TABLE 4.3
PCB AIR MONITORING RESULTS
REMOVAL ACTION CONSTRUCTION REPORT
TEXTILE ROAD SITE
WASHTENAW COUNTY, MICHIGAN

<i>Sample</i> <i>Stop Date</i>	<i>Sample ID</i>	<i>Location</i>	<i>Unit</i>	<i>Start</i>		<i>Stop</i>		<i>Sample Duration</i>		<i>Average</i> <i>Flow Rate</i> (m ³ /min)	<i>Total</i> <i>Volume</i> (m ³)
				<i>Date</i>	<i>Time</i>	<i>Date</i>	<i>Time</i>	(hrs:mins)	(minutes)		

Notes:
(1) - Background Sample
FB - Field Blank

TABLE 4.3

PCB AIR MONITORING RESULTS
REMOVAL ACTION CONSTRUCTION REPORT
TEXTILE ROAD SITE
WASHTENAW COUNTY, MICHIGAN

<i>Sample</i> <i>Stop Date</i>	<i>Sample ID</i>	<i>Location</i>	<i>Unit</i>	<i>Polychlorinated Biphenyls (PCBs) Concentration (µg/m³)</i>						<i>Aroclor</i> <i>1260</i>	<i>Total PCB</i> <i>Conc. (2)</i> <i>(µg/m³)</i>	<i>Action</i> <i>Level</i> <i>(µg/m³)</i>
				<i>Aroclor</i> <i>1016</i>	<i>Aroclor</i> <i>1221</i>	<i>Aroclor</i> <i>1232</i>	<i>Aroclor</i> <i>1242</i>	<i>Aroclor</i> <i>1248</i>	<i>Aroclor</i> <i>1254</i>			

Notes:
(1) - Background Sample
FB - Field Blank

TABLE 4.4

**SOIL EXCAVATION, BACKFILLING, AND DISPOSAL ACTIVITIES
REMOVAL ACTION CONSTRUCTION REPORT
TEXTILE ROAD SITE
WASHTENAW COUNTY, MICHIGAN**

Date	Excavation From	Transport To	Approximate Quantity (cu. yd.)	Amount Sent Off-Site				Backfilling
				Carleton Farms Landfill		Wayne Disposal		
				(tons)	(load)	(tons)	(load)	
11/19/1999	EA4	stockpile	375					
11/22/1999	EA1-E	stockpile						
11/23/1999	stockpile	CF	69	69	2			
11/24/1999	EA1-E	stockpile	200					
	stockpile	CF	396	396	10			
11/26/1999	EA1-E	stockpile	50					
11/29/1999	stockpile	CF	465	262	12			
11/30/1999	EA4	stockpile	500					
12/1/1999	EA4	WD	330			346	15	
12/2/1999	EA4	WD	638			726	29	
12/3/1999	EA1-NW	WD	440			554	20	
12/4/1999	stockpile	CF	608	635	16			
12/6/1999	EA4	WD	374			418	17	
12/7/1999	EA4	WD	462			502	21	
12/8/1999	EA4	WD	594			578	27	
12/9/1999	EA4	WD	682			709	31	
12/10/1999	EA4	WD	638			676	29	
12/11/1999	EA1 W	stockpile	40					
	EA3 NW	stockpile	30					
12/13/1999	EA3 SE	WD	418			468	19	
	stockpile	CF	38	1	38			
12/14/1999	EA3 SE	WD	110			110	5	
12/15/1999	EA3 SE	stockpile						
		WD	418			393	19	
12/16/1999	EA3 NE	stockpile						
	EA3 SE	stockpile						
		WD	506			535	23	
12/17/1999	EA3 NE	WD/stockpile						
	EA4 and EA3 SE	WD	428.07			610	27	
12/18/1999	EA2	stockpile						
12/20/1999	EA4	WD	330			379	15	
12/21/1999	EA4	WD	242			256	11	
	EA2	stockpile						
12/22/1999		WD	176			209	8	
12/23/1999	EA4	stockpile	50					
	stockpile	CF	722	949	19			
	EA4	WD	93			144	6	
1/3/2000	EA4	stockpile	20					
	EA3 SE	stockpile	7					
	EA5	stockpile	920					
	stockpile	CF	76	80	2			
1/4/2000	stockpile	WD	44			50	2	
1/5/2000	EA3 SE	direct load						
	EA3 SE	stockpile	20					
	EA2 E	stockpile	20					
	stockpile	CF	76	107	2			
1/7/2000	EA3 SW	stockpile						
	EA2 NW, W, SW	stockpile	500					
1/10/2000	stockpile	CF	152	168	4			
1/12/2000	EA3 NW	stockpile	240					
	EA2 E	stockpile						
	EA5 S		10					
1/13/2000	stockpile	WD	264			311	12	
1/14/2000	stockpile	EA3 SE	600					
	stockpile	WD	374			448	17	
1/17/2000	stockpile	WD	154			186	7	
	stockpile	CF	456	568	12			
1/18/2000		--						EA4
1/20/2000	EA1 S, W, and E	stockpile						EA1
	EA2 SW	EA3 NE						
	EA5	stockpile	40					

TABLE 4.4

**SOIL EXCAVATION, BACKFILLING, AND DISPOSAL ACTIVITIES
REMOVAL ACTION CONSTRUCTION REPORT
TEXTILE ROAD SITE
WASHTENAW COUNTY, MICHIGAN**

Date	Excavation From	Transport To	Approximate Quantity (cu. yd.)	Amount Sent Off-Site				Backfilling
				Carleton Farms Landfill		Wayne Disposal		
				(tons)	(load)	(tons)	(load)	
1/24/2000	EA1 S	stockpile	300					
	EA2	stockpile	520					
1/26/2000	stockpile (EA5)	direct load	38	33	1			
1/28/2000	EA3 NW overburden	EA3 NE						
1/31/2000	EA3 NW	WD	242			297	11	
	borrow area	--						EA2
	borrow area	--						EA3 NE & SE
	EA3 NW	stockpile	160					
2/1/2000	stockpile	WD	286			297	13	
	EA1 S	CF	722	795	19			
2/2/2000	EA1 S	CF	152	155	4			
	EA2 W							
2/3/2000	EA3 NW	staging area						
	borrow area	EA2						
2/7/2000		EA5						
	EA3 NW	staging area						
2/8/2000	EA3 NW	staging area						
2/9/2000	borrow area	--						EA4
		--						EA2
2/14/2000	staged area (EA3 NW)	CF	608	780	16			
	borrow area	EA4						
2/15/2000	EA3 NW	CF	570	649	15			
								EA1 S
2/16/2000	staging area	CF	114	69	3			
	construction materials							
2/17/2000	borrow area	--						EA3 NW
2/18/2000	EA5	--						EA3 NW
		--						EA5
2/22/2000	staging area	CF	570	344	15			EA3 NW
	construction materials							
2/23/2000	road stone & borrow area	backfill						EA3 NW
	misc. debris	CF	76	45	2			
Total			17,373	5,647	135	9,172	385	

Notes:

WD - Wayne Disposal

CF - Carleton Farms

EA - Excavation Area

cu. yd. - Cubic Yards

TABLE 4.5

**SUMMARY OF EXCAVATION AREA VOLUMES
REMOVAL ACTION CONSTRUCTION REPORT
TEXTILE ROAD SITE
WASHTENAW COUNTY, MICHIGAN**

<i>Excavation Area</i>	<i>Maximum Area (ft²)</i>	<i>Maximum Depth (ft)</i>	<i>Estimated Volume (cu. yd.)</i>
EA1 - E	3,297.97	12	1,155.51
EA1 - W	2,399.28	12	840.64
EA1 - S	2,269.82	10	795.28
Subtotal EA1	7,967.07		2,791.43
EA2	6,455.97	12	2,261.98
EA3 - NE	2,289.41	12	802.14
EA3 - SE	3,300.50	9	1,156.40
EA3 - SW	703.64	12	246.53
EA3 - NW	7,010.52	9	2,456.28
Subtotal EA3	13,304.07		4,661.35
EA4	17,235.21	11	6,038.71
EA5	4,622.73	15	1,619.67
TOTAL	49,585.05		17,373.13

TABLE 4.6

**SOIL STOCKPILE FACILITY PCB CHARACTERIZATION RESULTS
REMOVAL ACTION CONSTRUCTION REPORT
TEXTILE ROAD SITE
WASHTENAW COUNTY, MICHIGAN**

<i>Sample Id.</i>	<i>Date</i>	<i>Sample No.</i>	<i>Stockpile No.</i>							
S-4770-111999-SM-017	11/19/99	017	1	ND (2.1)	ND (4.3)	ND (2.1)	ND (2.1)	ND (2.1)	28 (2.1)	ND (2.1)
S-4770-111999-SM-018	11/19/99	018	2	ND (2.2)	ND (4.5)	ND (2.2)	ND (2.2)	ND (2.2)	34 (2.2)	ND (2.2)
S-4770-112299-SM-023	11/22/99	023	3	ND (2)	ND (4.1)	ND (2)	ND (2)	ND (2)	11 (2)	ND (2)
S-4770-112299-SM-024	11/22/99	024	4	ND (1.9)	ND (3.8)	ND (1.9)	ND (1.9)	ND (1.9)	34 (1.9)	ND (1.9)
S-4770-112899-SM-044	11/28/99	044	5	ND (0.37)	ND (0.37)	ND (0.37)	ND (0.37)	ND (0.37)	ND (0.37)	ND (0.37)
S-4770-113099-SM-055	11/30/99	055	6	ND (0.37)	ND (0.75)	ND (0.37)	ND (0.37)	ND (0.37)	5 (0.37)	ND (0.37)
S-4770-113099-SM-056	11/30/99	056	7	ND (8.3)	ND (17)	ND (8.3)	ND (8.3)	ND (8.3)	210 (8.3)	ND (8.3)
S-4770-122099-SM-184	12/20/99	184	8	ND (2)	ND (4)	ND (2)	ND (2)	ND (2)	36 (2)	ND (2)

TABLE 4.7

**CARLETON FARMS LANDFILL DISPOSAL SUMMARY
REMOVAL ACTION CONSTRUCTION REPORT
TEXTILE ROAD SITE
WASHTENAW COUNTY, MICHIGAN**

<i>Disposal Date</i>	<i>Loads per Day</i>	<i>Weight (tons)</i>	<i>Est. Volume (cubic yards)</i>
11/23/1999	2	69	76
11/24/1999	10	396	380
11/29/1999	12	262	456
12/4/1999	16	635	608
12/13/1999	1	38	38
12/23/1999	19	949	722
1/3/2000	2	80	76
1/5/2000	2	107	76
1/10/2000	4	168	152
1/17/2000	12	568	456
1/28/2000	1	33	38
2/1/2000	19	795	722
2/2/2000	4	155	152
2/14/2000	16	780	608
2/15/2000	15	649	570
TOTAL	135	5,647	5,092

TABLE 4.8

**WAYNE DISPOSAL, INC. DISPOSAL SUMMARY
REMOVAL ACTION CONSTRUCTION REPORT
TEXTILE ROAD SITE
WASHTENAW COUNTY, MICHIGAN**

<i>Disposal Date</i>	<i>Loads per Day</i>	<i>Weight (tons)</i>	<i>Est. Volume (cubic yards)</i>
12/1/1999	15	346	315
12/2/1999	29	726	660
12/3/1999	20	554	504
12/6/1999	17	418	380
12/7/1999	21	502	456
12/8/1999	27	578	525
12/9/1999	31	709	644
12/10/1999	29	676	614
12/13/1999	19	468	426
12/14/1999	5	110	100
12/15/1999	19	393	357
12/16/1999	24	535	487
12/17/1999	27	610	555
12/20/1999	15	379	345
12/21/1999	11	256	232
12/22/1999	8	209	190
12/23/1999	6	144	131
1/4/2000	2	50	45
1/13/2000	12	311	283
1/14/2000	17	448	407
1/17/2000	7	186	169
1/31/2000	11	297	270
2/1/2000	13	297	270
TOTAL	385	9,172	8,366

TABLE 4.9

**WASTEWATER TREATMENT SYSTEM EFFLUENT SAMPLE RESULTS
REMOVAL ACTION CONSTRUCTION REPORT
TEXTILE ROAD SITE
WASHTENAW COUNTY, MICHIGAN**

<i>Sample ID Date Sampled</i>	<i>Detection Limit</i>	<i>START UP-1 12/15/99</i>	<i>WW-1 12/15/99</i>	<i>WW-3 01/05/00</i>	<i>WW-4 01/12/00</i>	<i>WW-5 01/13/00</i>	<i>WW-6 01/21/00</i>	<i>WW-9 02/16/00</i>	<i>WW-10 02/17/00</i>	<i>WW-11 02/22/00</i>	<i>WW-12 02/23/00</i>	<i>WW-13 02/28/00</i>
<u>Metals, mg/L</u>												
Arsenic	0.1	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Cadmium	0.003	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Chromium	0.05	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Copper	0.02	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Iron	0.1	1.3	ND	0.87	0.73	0.35	0.59	1.6	1.1	1.3	0.12	0.94
Lead	0.05	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Mercury	0.0002	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Nickel	0.05	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.06
Silver	0.0005	ND	ND	ND	ND	ND	ND	ND	ND	0.0005	ND	ND
Zinc	0.02	0.04	0.26	2.3	1.4	0.92	1.5	9.0	1.6	2.5	0.25	4.4
<u>Inorganics, mg/L</u>												
Hardness by Calculation	5	NA	NA	460	220	250	230	750	570	560	N/A	350
pH ⁽¹⁾	NA	7.4	10.5	7.9	7.6	8.4	8.1	7.2	7.7	7.3	7.3	7.1
Phosphorous (total)	0.005	ND(0.02)	1.5	0.16	0.03	0.06	ND	0.04	ND(0.02)	0.10	0.04	0.11
Total Cyanide	0.005	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Total Suspended Solids	10	17	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
<u>Organics, mg/L</u>												
BOD5	2	57	ND	19	2.8	8.5	6.2	ND	7.1	8.8	7.2	4.8
Oil & Grease	5	11	ND	33	11	7	10	ND	28	10	16	16
Phenol (4-AAP)	0.01	0.04	0.02	0.06	0.03	ND	0.04	0.03	0.06	0.04	0.02	0.02
<u>Volatile Organic Compounds (VOCs), ug/L</u>												
Benzene	1	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Toluene	1	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Ehtyl benzene	1	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Xylenes	3	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
<u>Polychlorinated Biphenyls (PCBs), ug/L</u>												
Aroclor 1016	0.2	ND	ND	ND	ND	ND	ND	ND	ND	ND(0.5)	ND	ND
Aroclor 1221	0.2	ND	ND	ND	ND	ND	ND	ND	ND	ND(0.5)	ND	ND
Aroclor 1232	0.4	ND	ND	ND	ND	ND	ND	ND	ND	ND(1.0)	ND	ND
Aroclor 1242	0.2	ND	ND	ND	ND	ND	ND	ND	ND	ND(0.5)	ND	ND
Aroclor 1248	0.2	ND	ND	ND	ND	ND	ND	ND	ND	ND(0.5)	ND	ND
Aroclor 1254	0.2	ND	ND	ND	ND	ND	ND	ND	ND	ND(0.5)	ND	ND
Aroclor 1260	0.2	ND	ND	ND	ND	ND	ND	ND	ND	ND(0.5)	ND	ND

Notes:

(1) - Units Not Applicable

NA - Not Analyzed

ND - Not Detected at the Reporting Limit

Sample No. WW-2, WW-7, and WW-8 consisted of CET internal wastewater treatment system samples and was not provided to CRA.

TABLE 4.10
GROUNDWATER SAMPLE RESULTS
REMOVAL ACTION CONSTRUCTION REPORT
TEXTILE ROAD SITE
WASHTENAW COUNTY, MICHIGAN

Sample Location Sample ID (L-4770-) Sample Date	Michigan Act 451, Part 201 Criteria		EOC Study Report		MW1-D	MW1-U	MW2-D	MW2-U	MW4-U	MW5-U	MW5-U	MW6-U
	Residential Drinking Water	Groundwater/Surface Water Interface	Background Concentration		022400-SM-455	022400-SM-456	022900-SM-462	022400-SM-457	022800-SM-461	022800-SM-458	022800-SM-459	022800-SM-460
			Upper Aquifer	Lower Aquifer	02/24/00	02/24/00	02/29/00	02/24/00	02/28/00	02/28/00	02/28/00 Duplicate	02/28/00
<u>Volatile Organic Compounds (VOCs), ug/L</u>												
Benzene	5	200	--	--	ND (1.0)	ND (1.0)	ND (1.0)	4.8	ND (1.0)	ND (1.0)	ND (1.0)	ND (1.0)
Chlorobenzene	100	47	--	--	ND (1.0)	3.7	ND (1.0)	ND (1.0)	ND (1.0)	ND (1.0)	ND (1.0)	ND (1.0)
<u>Semi-Volatile Organic Compounds (SVOCs), ug/L</u>												
bis(2-Ethylhexyl) phthalate	6	32	--	--	1,200	ND (5.0)	150	ND (5.0)	ND (5.0)	ND (5.0)	ND (5.0)	ND (5.0)
<u>Polychlorinated Biphenyls (PCBs)¹, ug/L</u>												
Aroclor 1254	0.5	0.2	--	--	ND (1.0)	6.9	ND (1.0)	ND (1.0)	ND (1.0)	ND (1.0)	ND (1.0)	ND (1.0)
Aroclor 1260	0.5	0.2	--	--	ND (1.0)	0.70 J	ND (1.0)R	ND (1.0)	ND (1.0)R	ND (1.0)R	ND (1.0)R	ND (1.0)R
<u>Inorganics, mg/L</u>												
Iron	0.3	N/A	7.123	0.65	0.65 J	21.0 J	2.6	4.9 J	1.3	5.2 J	5.9 J	ND (0.12)U
Manganese	0.05	N/A	0.25	0.106	0.056	1.3	0.048	0.48	0.17	0.25	0.24	0.13

Notes:

☐ - Value exceeds applicable criteria or background concentrations.

N/A - Not Available or Applicable.

ND () - Not detected above stated quantitation limit in parenthesis.

J - Qualified as an estimated value.

ND()U - The analyte was analyzed for, but was not detected above the reported sample quantitation limit in parenthesis.

R - The sample results were rejected due to serious deficiencies in the ability to analyze the sample

and meet quality control criteria. The presence or absence of the analyte cannot be verified.

¹ - PCB were reported by the laboratory down to their method detection limit (MDL) of 0.19 µg/L for all aroclors.

TABLE 5.1

**FINAL PCB SOIL VERIFICATION SAMPLE RESULTS
REMOVAL ACTION CONSTRUCTION REPORT
TEXTILE ROAD SITE
WASHTENAW COUNTY, MICHIGAN**

Sample Id.	Date	Sample No	Area	Type	Aroclor 1016	Aroclor 1221	Aroclor 1232	Aroclor 1242	Aroclor 1248	Aroclor 1254		Cleanup Level (mg/kg)
S-4770-112999-NOVA-045	11/29/99	045	1-E	Wall	ND (0.38)	ND (0.38)	ND (0.38)	ND (0.38)	ND (0.38)	ND (0.38)	ND (0.38)	1.2
S-4770-112999-NOVA-046	11/29/99	046	1-E	Wall	ND (0.36)	ND (0.36)	ND (0.36)	ND (0.36)	ND (0.36)	ND (0.36)	ND (0.36)	1.2
S-4770-112999-NOVA-047	11/29/99	047	1-E	Wall	ND (0.38)	ND (0.38)	ND (0.38)	ND (0.38)	ND (0.38)	ND (0.38)	ND (0.38)	1.2
S-4770-112999-NOVA-048	11/29/99	048	1-E	Wall	ND (0.38)	ND (0.38)	ND (0.38)	ND (0.38)	ND (0.38)	0.38 (0.38)	ND (0.38)	1.2
S-4770-112999-NOVA-049	11/29/99	049	1-E	Wall	ND (0.36)	ND (0.36)	ND (0.36)	ND (0.36)	ND (0.36)	ND (0.36)	ND (0.36)	1.2
S-4770-112999-NOVA-050	11/29/99	050	1-E	Floor	ND (0.39)	ND (0.39)	ND (0.39)	ND (0.39)	ND (0.39)	ND (0.39)	ND (0.39)	1.2
S-4770-112999-NOVA-051	11/29/99	051	1-E	Floor	ND (0.38)	ND (0.38)	ND (0.38)	ND (0.38)	ND (0.38)	ND (0.38)	ND (0.38)	1.2
S-4770-112999-NOVA-052	11/29/99	052	1-E	Floor	ND (0.39)	ND (0.39)	ND (0.39)	ND (0.39)	ND (0.39)	ND (0.39)	ND (0.39)	1.2
S-4770-112999-NOVA-053	11/29/99	053	1-E	Floor	ND (0.38)	ND (0.38)	ND (0.38)	ND (0.38)	ND (0.38)	ND (0.38)	ND (0.38)	1.2
S-4770-112999-NOVA-054	11/29/99	054	1-E	Duplicate of 053	ND (0.39)	ND (0.39)	ND (0.39)	ND (0.39)	ND (0.39)	ND (0.39)	ND (0.39)	1.2
S-4770-011200-NOVA-296	01/12/00	296	1-C	Floor	ND (0.41)	ND (0.41)	ND (0.41)	ND (0.41)	ND (0.41)	ND (0.41)	ND (0.41)	1.2
S-4770-011200-NOVA-297	01/12/00	297	1-C	Floor	ND (0.41)	ND (0.41)	ND (0.41)	ND (0.41)	ND (0.41)	ND (0.41)	ND (0.41)	1.2
S-4770-011200-NOVA-313	01/12/00	313	1-C	Wall	ND (0.35)	ND (0.35)	ND (0.35)	ND (0.35)	ND (0.35)	ND (0.35)	ND (0.35)	1.2
S-4770-011200-NOVA-314	01/12/00	314	1-C	Wall	ND (0.39)	ND (0.39)	ND (0.39)	ND (0.39)	ND (0.39)	ND (0.39)	ND (0.39)	1.2
S-4770-011200-NOVA-315	01/12/00	315	1-C	Wall	ND (0.43)	ND (0.44)	ND (0.43)	ND (0.43)	ND (0.43)	0.52 (0.43)	ND (0.43)	1.2

TABLE 5.1

**FINAL PCB SOIL VERIFICATION SAMPLE RESULTS
REMOVAL ACTION CONSTRUCTION REPORT
TEXTILE ROAD SITE
WASHTENAW COUNTY, MICHIGAN**

Sample Id.	Date	Sample No	Area	Type	Polychlorinated Biphenyl (PCB) Soil Results (mg/kg)								Cleanup
					Aroclor 1016	Aroclor 1221	Aroclor 1232	Aroclor 1242	Aroclor 1248	Aroclor 1254	Aroclor 1260	Level (mg/kg)	
S-4770-020200-NOVA-417	02/02/00	417	1-S	Duplicate of 416	ND (0.34)	ND (0.34)	ND (0.34)	ND (0.34)	ND (0.34)	ND (0.34)	ND (0.34)	1.2	
S-4770-020200-NOVA-418	02/02/00	418	1-S		Wall	ND (0.34)	ND (0.34)	ND (0.34)	ND (0.34)	ND (0.34)	0.5 (0.34)	ND (0.34)	1.2
S-4770-020200-NOVA-419	02/02/00	419	1-S	Wall	ND (0.35)	ND (0.35)	ND (0.35)	ND (0.35)	ND (0.35)	ND (0.35)	0.64 (0.35)	1.2	
S-4770-020200-NOVA-420	02/02/00	420	1-S	Duplicate of 419	ND (0.35)	ND (0.35)	ND (0.35)	ND (0.35)	ND (0.35)	1.1 (0.35)	1.1 (0.35)	1.2	
S-4770-020200-NOVA-421	02/02/00	421	1-S		Wall	ND (0.36)	ND (0.36)	ND (0.36)	ND (0.36)	ND (0.36)	ND (0.36)	ND (0.36)	1.2
S-4770-020900-SM-446	02/09/00	446	1-S	Floor	ND (0.34)	ND (0.34)	ND (0.34)	ND (0.34)	ND (0.34)	ND (0.34)	ND (0.34)	1.2	
S-4770-112399-NOVA-029	11/23/99	029	1-W	Floor	ND (0.37)	ND (0.37)	ND (0.37)	ND (0.37)	ND (0.37)	ND (0.37)	ND (0.37)	1.2	
S-4770-112399-NOVA-030	11/23/99	030	1-W	Wall	ND (0.36)	ND (0.36)	ND (0.36)	ND (0.36)	ND (0.36)	ND (0.36)	ND (0.36)	1.2	
S-4770-112399-NOVA-031	11/23/99	031	1-W	Wall	ND (0.38)	ND (0.38)	ND (0.38)	ND (0.38)	ND (0.38)	ND (0.38)	ND (0.38)	1.2	
S-4770-112399-NOVA-033	11/23/99	033	1-W	Floor	ND (0.41)	ND (0.41)	ND (0.41)	ND (0.41)	ND (0.41)	ND (0.41)	0.57 (0.41)	1.2	
S-4770-112399-NOVA-034	11/23/99	034	1-W	Wall	ND (0.38)	ND (0.38)	ND (0.38)	ND (0.38)	ND (0.38)	ND (0.38)	ND (0.38)	1.2	
S-4770-112399-NOVA-035	11/23/99	035	1-W	Wall	ND (0.35)	ND (0.35)	ND (0.35)	ND (0.35)	ND (0.35)	ND (0.35)	ND (0.35)	1.2	
S-4770-112399-NOVA-036	11/23/99	036	1-W	Wall	ND (0.46)	ND (0.46)	ND (0.46)	ND (0.46)	ND (0.46)	ND (0.46)	ND (0.46)	1.2	
S-4770-112399-NOVA-038	11/23/99	038	1-W	Floor	ND (0.41)	ND (0.41)	ND (0.41)	ND (0.41)	ND (0.41)	ND (0.41)	ND (0.41)	1.2	
S-4770-121199-SM-134	12/11/99	134	1-W	Floor	ND (0.42)	ND (0.42)	ND (0.42)	ND (0.42)	ND (0.42)	ND (0.42)	ND (0.42)	1.2	
S-4770-121199-SM-135	12/11/99	135	1-W	Floor	ND (0.42)	ND (0.42)	ND (0.42)	ND (0.42)	ND (0.42)	ND (0.42)	ND (0.42)	1.2	
S-4770-121199-SM-136	12/11/99	136	1-W	Floor	ND (0.4)	ND (0.4)	ND (0.4)	ND (0.4)	ND (0.4)	ND (0.4)	ND (0.4)	1.2	
S-4770-121599-NOVA-160	12/15/99	160	1-W	Floor	ND (0.41)	ND (0.41)	ND (0.41)	ND (0.41)	ND (0.41)	ND (0.41)	ND (0.41)	1.2	
S-4770-121599-NOVA-161	12/15/99	161	1-W	Floor	ND (0.42)	ND (0.42)	ND (0.42)	ND (0.42)	ND (0.42)	ND (0.42)	ND (0.42)	1.2	
S-4770-121599-NOVA-162	12/15/99	162	1-W	Floor	ND (0.4)	ND (0.4)	ND (0.4)	ND (0.4)	ND (0.4)	ND (0.4)	ND (0.4)	1.2	
S-4770-122999-NOVA-216	12/29/99	216	2	Wall	ND (0.34)	ND (0.34)	ND (0.34)	ND (0.34)	ND (0.34)	ND (0.34)	ND (0.34)	1.2	
S-4770-122999-NOVA-217	12/29/99	217	2	Wall	ND (0.4)	ND (0.4)	ND (0.4)	ND (0.4)	ND (0.4)	ND (0.4)	ND (0.4)	1.2	
S-4770-122999-NOVA-219	12/29/99	219	2	Floor	ND (0.4)	ND (0.4)	ND (0.4)	ND (0.4)	ND (0.4)	ND (0.4)	ND (0.4)	1.2	
S-4770-122999-NOVA-221	12/29/99	221	2	Duplicate of 219	ND (0.39)	ND (0.39)	ND (0.39)	ND (0.39)	ND (0.39)	ND (0.39)	ND (0.39)	1.2	
S-4770-010300-NOVA-227	01/03/00	227	2		Wall	ND (0.35)	ND (0.35)	ND (0.35)	ND (0.35)	ND (0.35)	ND (0.35)	ND (0.35)	1.2
S-4770-010300-NOVA-228	01/03/00	228	2	Floor	ND (0.38)	ND (0.38)	ND (0.38)	ND (0.38)	ND (0.38)	ND (0.38)	ND (0.38)	1.2	
S-4770-010300-NOVA-229	01/03/00	229	2	Wall	ND (0.39)	ND (0.39)	ND (0.39)	ND (0.39)	ND (0.39)	1.0 (0.39)	0.49 (0.39)	1.2	
S-4770-010700-NOVA-274	01/07/00	274	2	Floor	ND (0.39)	ND (0.39)	ND (0.39)	ND (0.39)	ND (0.39)	1.2 (0.39)	0.43 (0.39)	1.2	
S-4770-010700-NOVA-277	01/07/00	277	2	Wall	ND (0.39)	ND (0.39)	ND (0.39)	ND (0.39)	ND (0.39)	0.82 (0.39)	ND (0.39)	1.2	
S-4770-010700-NOVA-279	01/07/00	279	2	Wall	ND (0.38)	ND (0.38)	ND (0.38)	ND (0.38)	ND (0.38)	ND (0.38)	ND (0.38)	1.2	
S-4770-011000-NOVA-286	01/10/00	286	2	Floor	ND (0.4)	ND (0.4)	ND (0.4)	ND (0.4)	ND (0.4)	0.46 (0.4)	ND (0.4)	1.2	
S-4770-011000-NOVA-287	01/10/00	287	2	Floor	ND (0.39)	ND (0.39)	ND (0.39)	ND (0.39)	ND (0.39)	ND (0.39)	ND (0.39)	1.2	
S-4770-011000-NOVA-289	01/10/00	289	2	Wall	ND (0.38)	ND (0.38)	ND (0.38)	ND (0.38)	ND (0.38)	ND (0.38)	ND (0.38)	1.2	
S-4770-011200-NOVA-304	01/12/00	304	2	Floor	ND (0.41)	ND (0.42)	ND (0.41)	ND (0.41)	ND (0.41)	0.8 (0.41)	ND (0.41)	1.2	
S-4770-011200-NOVA-305	01/12/00	305	2	Floor	ND (0.41)	ND (0.41)	ND (0.41)	ND (0.41)	ND (0.41)	ND (0.41)	ND (0.41)	1.2	
S-4770-011200-NOVA-308	01/12/00	308	2	Wall	ND (0.39)	ND (0.39)	ND (0.39)	ND (0.39)	ND (0.39)	ND (0.39)	ND (0.39)	1.2	
S-4770-011200-NOVA-309	01/12/00	309	2	Wall	ND (0.36)	ND (0.37)	ND (0.36)	ND (0.36)	ND (0.36)	ND (0.36)	ND (0.36)	1.2	
S-4770-011200-NOVA-310	01/12/00	310	2	Wall	ND (0.36)	ND (0.36)	ND (0.36)	ND (0.36)	ND (0.36)	ND (0.36)	ND (0.36)	1.2	

TABLE 5.1

**FINAL PCB SOIL VERIFICATION SAMPLE RESULTS
REMOVAL ACTION CONSTRUCTION REPORT
TEXTILE ROAD SITE
WASHTENAW COUNTY, MICHIGAN**

Sample Id.	Date	Sample No	Area	Type	Polychlorinated Biphenyl (PCB) Soil Results (mg/kg)								Cleanup
					Aroclor 1016	Aroclor 1221	Aroclor 1232	Aroclor 1242	Aroclor 1248	Aroclor 1254	Aroclor 1260	Level (mg/kg)	
S-4770-011200-NOVA-311	01/12/00	311	2	Wall	ND (0.43)	ND (0.43)	ND (0.43)	ND (0.43)	ND (0.43)	ND (0.43)	ND (0.43)	1.2	
S-4770-011200-NOVA-312	01/12/00	312	2	Floor	ND (0.39)	ND (0.39)	ND (0.39)	ND (0.39)	ND (0.39)	ND (0.39)	ND (0.39)	1.2	
S-4770-011700-NOVA-330	01/17/00	330	2	Floor	ND (0.39)	ND (0.39)	ND (0.39)	ND (0.39)	ND (0.39)	ND (0.39)	ND (0.39)	1.2	
S-4770-012400-NOVA-351	01/24/00	351	2	Wall	ND (0.38)	ND (0.38)	ND (0.38)	ND (0.38)	ND (0.38)	ND (0.38)	ND (0.38)	1.2	
S-4770-012400-NOVA-352	01/24/00	352	2	Wall	ND (0.38)	ND (0.38)	ND (0.38)	ND (0.38)	ND (0.38)	ND (0.38)	ND (0.38)	1.2	
S-4770-012400-NOVA-353	01/24/00	353	2	Wall	ND (0.38)	ND (0.38)	ND (0.38)	ND (0.38)	ND (0.38)	ND (0.38)	ND (0.38)	1.2	
S-4770-012400-NOVA-355	01/24/00	355	2	Floor	ND (0.4)	ND (0.4)	ND (0.4)	ND (0.4)	ND (0.4)	ND (0.4)	ND (0.4)	1.2	
S-4770-012400-NOVA-356	01/24/00	356	2	Floor	ND (0.41)	ND (0.41)	ND (0.41)	ND (0.41)	ND (0.41)	ND (0.41)	ND (0.41)	1.2	
S-4770-012400-NOVA-357	01/24/00	357	2	Floor	ND (0.42)	ND (0.42)	ND (0.42)	ND (0.42)	ND (0.42)	ND (0.42)	ND (0.42)	1.2	
S-4770-012400-SM-375	01/24/00	375	2	Floor	ND (0.42)	ND (0.42)	ND (0.42)	ND (0.42)	ND (0.42)	ND (0.42)	ND (0.42)	1.2	
S-4770-012500-NOVA-378	01/25/00	378	2	Wall	ND (0.35)	ND (0.35)	ND (0.35)	ND (0.35)	ND (0.35)	ND (0.35)	ND (0.35)	1.2	
S-4770-012500-NOVA-379	01/25/00	379	2	Wall	ND (0.35)	ND (0.35)	ND (0.35)	ND (0.35)	ND (0.35)	0.65 (0.35)	ND (0.35)	1.2	
S-4770-012500-NOVA-382	01/25/00	382	2	Wall	ND (0.35)	ND (0.35)	ND (0.35)	ND (0.35)	ND (0.35)	1.0 (0.35)	ND (0.35)	1.2	
S-4770-012500-NOVA-383	01/25/00	383	2	Wall	ND (0.36)	ND (0.36)	ND (0.36)	ND (0.36)	ND (0.36)	1.1 (0.36)	ND (0.36)	1.2	
S-4770-012500-NOVA-384	01/25/00	384	2	Duplicate of 383	ND (0.36)	ND (0.36)	ND (0.36)	ND (0.36)	ND (0.36)	0.94 (0.36)	ND (0.36)	1.2	
S-4770-020200-NOVA-405	02/02/00	405	2		Floor	ND (0.4)	ND (0.4)	ND (0.4)	ND (0.4)	ND (0.4)	ND (0.4)	ND (0.4)	1.2
S-4770-020200-NOVA-406	02/02/00	406	2		Floor	ND (0.4)	ND (0.4)	ND (0.4)	ND (0.4)	ND (0.4)	ND (0.4)	ND (0.4)	1.2
S-4770-020200-NOVA-407	02/02/00	407	2	Floor	ND (0.41)	ND (0.41)	ND (0.41)	ND (0.41)	ND (0.41)	ND (0.41)	ND (0.41)	1.2	
S-4770-020200-NOVA-408	02/02/00	408	2	Floor	ND (0.42)	ND (0.42)	ND (0.42)	ND (0.42)	ND (0.42)	ND (0.42)	ND (0.42)	1.2	
S-4770-020200-NOVA-422	02/02/00	422	2	Wall	ND (0.35)	ND (0.35)	ND (0.35)	ND (0.35)	ND (0.35)	ND (0.35)	ND (0.35)	1.2	
S-4770-122099-NOVA-170	12/20/99	170	3-NE	Wall	ND (0.35)	ND (0.35)	ND (0.35)	ND (0.35)	ND (0.35)	ND (0.35)	ND (0.35)	26.0	
S-4770-122099-NOVA-171	12/20/99	171	3-NE	Wall	ND (0.39)	ND (0.39)	ND (0.39)	ND (0.39)	ND (0.39)	ND (0.39)	ND (0.39)	26.0	
S-4770-122099-NOVA-172	12/20/99	172	3-NE	Wall	ND (2)	ND (4)	ND (2)	ND (2)	ND (2)	8.4 (2)	ND (2)	26.0	
S-4770-122099-NOVA-174	12/20/99	174	3-NE	Wall	ND (0.48)	ND (0.48)	ND (0.48)	ND (0.48)	ND (0.48)	4.0 (0.48)	ND (0.48)	26.0	
S-4770-122099-NOVA-175	12/20/99	175	3-NE	Floor	ND (1.1)	ND (2.3)	ND (1.1)	ND (1.1)	ND (1.1)	9.8 (1.1)	ND (1.1)	26.0	
S-4770-122099-NOVA-176	12/20/99	176	3-NE	Wall	ND (1.8)	ND (3.7)	ND (1.8)	ND (1.8)	ND (1.8)	7.4 (1.8)	ND (1.8)	26.0	
S-4770-122099-NOVA-182	12/20/99	182	3-NE	Duplicate of 179	ND (0.34)	ND (0.34)	ND (0.34)	ND (0.34)	ND (0.34)	ND (0.34)	ND (0.34)	26.0	
S-4770-122199-NOVA-188	12/21/99	188	3-NE		Floor	ND (0.36)	ND (0.73)	ND (0.36)	ND (0.36)	ND (0.36)	1.0 (0.36)	ND (0.36)	26.0
S-4770-122199-NOVA-189	12/21/99	189	3-NE	Wall	ND (0.35)	ND (0.35)	ND (0.35)	ND (0.35)	ND (0.35)	ND (0.35)	ND (0.35)	26.0	
S-4770-122199-NOVA-190	12/21/99	190	3-NE	Floor	ND (0.38)	ND (0.76)	ND (0.38)	ND (0.38)	ND (0.38)	1.3 (0.38)	ND (0.38)	26.0	
S-4770-122199-NOVA-191	12/21/99	191	3-NE	Wall	ND (0.48)	ND (0.48)	ND (0.48)	ND (0.48)	ND (0.48)	ND (0.48)	ND (0.48)	26.0	
S-4770-122199-NOVA-192	12/21/99	192	3-NE	Wall	ND (0.45)	ND (0.45)	ND (0.45)	ND (0.45)	ND (0.45)	0.48 (0.45)	ND (0.45)	26.0	
S-4770-122199-NOVA-194	12/21/99	194	3-NE	Duplicate of 192	ND (0.42)	ND (0.42)	ND (0.42)	ND (0.42)	ND (0.42)	3.1 (0.42)	ND (0.42)	26.0	
S-4770-010400-NOVA-235	01/04/00	235	3-NE		Wall	ND (0.36)	ND (0.36)	ND (0.36)	ND (0.36)	ND (0.36)	0.37 (0.36)	ND (0.36)	26.0
S-4770-010400-NOVA-236	01/04/00	236	3-NE	Floor	ND (0.39)	ND (0.39)	ND (0.39)	ND (0.39)	ND (0.39)	ND (0.39)	ND (0.39)	26.0	
S-4770-010400-NOVA-237	01/04/00	237	3-NE	Wall	ND (0.35)	ND (0.35)	ND (0.35)	ND (0.35)	ND (0.35)	ND (0.35)	ND (0.35)	26.0	
S-4770-010400-NOVA-239	01/04/00	239	3-NE	Floor	ND (1.9)	ND (3.8)	ND (1.9)	ND (1.9)	ND (1.9)	3.5 (1.9)	ND (1.9)	26.0	
S-4770-010500-NOVA-262	01/05/00	262	3-NE	Floor	ND (0.38)	ND (0.38)	ND (0.38)	ND (0.38)	ND (0.38)	ND (0.38)	ND (0.38)	26.0	

TABLE 5.1

**FINAL PCB SOIL VERIFICATION SAMPLE RESULTS
REMOVAL ACTION CONSTRUCTION REPORT
TEXTILE ROAD SITE
WASHTENAW COUNTY, MICHIGAN**

Sample Id.	Date	Sample No	Area	Type	<u>Polychlorinated Biphenyl (PCB) Soil Results (mg/kg)</u>							Cleanup Level (mg/kg)
					Aroclor 1016	Aroclor 1221	Aroclor 1232	Aroclor 1242	Aroclor 1248	Aroclor 1254	Aroclor 1260	
S-4770-120199-NOVA-061	12/01/99	061	3-NW	Wall	ND (0.34)	ND (0.35)	ND (0.34)	ND (0.34)	ND (0.34)	0.52 (0.34)	ND (0.34)	26.0
S-4770-120199-NOVA-062	12/01/99	062	3-NW	Wall	ND (1.1)	ND (2.2)	ND (1.1)	ND (1.1)	ND (1.1)	5.4 (1.1)	ND (1.1)	26.0
S-4770-120199-NOVA-063	12/01/99	063	3-NW	Wall	ND (0.4)	ND (0.81)	ND (0.4)	ND (0.4)	ND (0.4)	9.1 (0.4)	ND (0.4)	26.0
S-4770-120199-NOVA-064	12/01/99	064	3-NW	Wall	ND (0.36)	ND (0.73)	ND (0.36)	ND (0.36)	ND (0.36)	1.9 (0.36)	ND (0.36)	26.0
S-4770-120199-NOVA-065	12/01/99	065	3-NW	Wall	ND (0.62)	ND (1.3)	ND (0.62)	ND (0.62)	ND (0.62)	11 (0.62)	ND (0.62)	26.0
S-4770-120199-NOVA-066	12/01/99	066	3-NW	Wall	ND (0.34)	ND (0.7)	ND (0.34)	ND (0.34)	ND (0.34)	ND (0.34)	0.94 (0.34)	26.0
S-4770-120199-NOVA-067	12/01/99	067	3-NW	Floor	ND (0.34)	ND (0.34)	ND (0.34)	ND (0.34)	ND (0.34)	1.1 (0.34)	ND (0.34)	26.0
S-4770-120199-NOVA-068	12/01/99	068	3-NW	Floor	ND (0.34)	ND (0.69)	ND (0.34)	ND (0.34)	ND (0.34)	0.77 (0.34)	ND (0.34)	26.0
S-4770-120199-NOVA-069	12/01/99	069	3-NW	Floor	ND (1.2)	ND (2.3)	ND (1.2)	ND (1.2)	ND (1.2)	14 (1.2)	ND (1.2)	26.0
S-4770-120199-NOVA-070	12/01/99	070	3-NW	Floor	ND (1.4)	ND (2.9)	ND (1.4)	ND (1.4)	ND (1.4)	3.3 (1.4)	ND (1.4)	26.0
S-4770-120199-SM-074	12/01/99	074	3-NW	Soil	ND (4.9)	ND (10)	ND (4.9)	ND (4.9)	ND (4.9)	ND (4.9)	ND (4.9)	26.0
S-4770-121199-SM-132	12/11/99	132	3-NW	Floor	ND (0.4)	ND (0.4)	ND (0.4)	ND (0.4)	ND (0.4)	ND (0.4)	ND (0.4)	26.0
S-4770-121199-SM-133	12/11/99	133	3-NW	Wall	ND (0.46)	ND (0.46)	ND (0.46)	ND (0.46)	ND (0.46)	ND (0.46)	ND (0.46)	26.0
S-4770-020300-SM-424	02/03/00	424	3-NW	Floor	ND (0.4)	ND (0.4)	ND (0.4)	ND (0.4)	ND (0.4)	ND (0.4)	ND (0.4)	26.0
S-4770-020300-SM-425	02/03/00	425	3-NW	Floor	ND (0.42)	ND (0.42)	ND (0.42)	ND (0.42)	ND (0.42)	ND (0.42)	ND (0.42)	26.0
S-4770-020300-SM-426	02/03/00	426	3-NW	Floor	ND (0.41)	ND (0.41)	ND (0.41)	ND (0.41)	ND (0.41)	ND (0.41)	ND (0.41)	26.0
S-4770-020300-SM-427	02/03/00	427	3-NW	Floor	ND (0.39)	ND (0.39)	ND (0.39)	ND (0.39)	ND (0.39)	ND (0.39)	ND (0.39)	26.0
S-4770-020300-SM-428	02/03/00	428	3-NW	Floor	ND (0.41)	ND (0.41)	ND (0.41)	ND (0.41)	ND (0.41)	ND (0.41)	ND (0.41)	26.0
S-4770-020300-SM-429	02/03/00	429	3-NW	Floor	ND (0.4)	ND (0.4)	ND (0.4)	ND (0.4)	ND (0.4)	ND (0.4)	ND (0.4)	26.0
S-4770-020800-NOVA-433	02/08/00	433	3-NW	Floor	ND (0.42)	ND (0.42)	ND (0.42)	ND (0.42)	ND (0.42)	ND (0.42)	ND (0.42)	26.0
S-4770-020800-NOVA-434	02/08/00	434	3-NW	Duplicate of 433	ND (0.42)	ND (0.42)	ND (0.42)	ND (0.42)	ND (0.42)	ND (0.42)	ND (0.42)	26.0
S-4770-020800-NOVA-435	02/08/00	435	3-NW	Wall	ND (0.35)	ND (0.35)	ND (0.35)	ND (0.35)	ND (0.35)	ND (0.35)	ND (0.35)	26.0
S-4770-020800-NOVA-436	02/08/00	436	3-NW	Wall	ND (0.35)	ND (0.35)	ND (0.35)	ND (0.35)	ND (0.35)	ND (0.35)	ND (0.35)	26.0
S-4770-020800-NOVA-437	02/08/00	437	3-NW	Wall	ND (0.35)	ND (0.35)	ND (0.35)	ND (0.35)	ND (0.35)	ND (0.35)	ND (0.35)	26.0
S-4770-020800-NOVA-438	02/08/00	438	3-NW	Wall	ND (0.34)	ND (0.34)	ND (0.34)	ND (0.34)	ND (0.34)	ND (0.34)	ND (0.34)	26.0
S-4770-020800-NOVA-439	02/08/00	439	3-NW	Wall	ND (0.35)	ND (0.35)	ND (0.35)	ND (0.35)	ND (0.35)	ND (0.35)	ND (0.35)	26.0
S-4770-020800-NOVA-440	02/08/00	440	3-NW	Wall	ND (0.34)	ND (0.34)	ND (0.34)	ND (0.34)	ND (0.34)	ND (0.34)	ND (0.34)	26.0
S-4770-020800-NOVA-441	02/08/00	441	3-NW	Wall	ND (0.34)	ND (0.34)	ND (0.34)	ND (0.34)	ND (0.34)	1.0 (0.34)	ND (0.34)	26.0
S-4770-020800-NOVA-442	02/08/00	442	3-NW	Wall	ND (0.34)	ND (0.34)	ND (0.34)	ND (0.34)	ND (0.34)	1.1 (0.34)	ND (0.34)	26.0
S-4770-122099-NOVA-164	12/20/99	164	3-SE	Wall	ND (0.34)	ND (0.34)	ND (0.34)	ND (0.34)	ND (0.34)	0.34 (0.34)	ND (0.34)	26.0
S-4770-122099-NOVA-165	12/20/99	165	3-SE	Wall	ND (0.47)	ND (0.96)	ND (0.47)	ND (0.47)	ND (0.47)	9.3 (0.47)	ND (0.47)	26.0
S-4770-122099-NOVA-166	12/20/99	166	3-SE	Floor	ND (0.43)	ND (0.87)	ND (0.43)	ND (0.43)	ND (0.43)	0.82 (0.43)	ND (0.43)	26.0
S-4770-122099-NOVA-167	12/20/99	167	3-SE	Wall	ND (0.36)	ND (0.36)	ND (0.36)	ND (0.36)	ND (0.36)	1.9 (0.36)	ND (0.36)	26.0
S-4770-122099-NOVA-168	12/20/99	168	3-SE	Wall	ND (1.2)	ND (2.4)	ND (1.2)	ND (1.2)	ND (1.2)	18 (1.2)	ND (1.2)	26.0
S-4770-010500-NOVA-264	01/05/00	264	3-SE	Floor	ND (0.39)	ND (0.39)	ND (0.39)	ND (0.39)	ND (0.39)	ND (0.39)	ND (0.39)	26.0
S-4770-121599-NOVA-163	12/15/99	163	3-SW	Floor	ND (0.51)	ND (0.51)	ND (0.51)	ND (0.51)	ND (0.51)	1.3 (0.51)	ND (0.51)	26.0
S-4770-122099-NOVA-177	12/20/99	177	3-SW	Wall	ND (0.45)	ND (0.45)	ND (0.45)	ND (0.45)	ND (0.45)	ND (0.45)	ND (0.45)	26.0
S-4770-122099-NOVA-178	12/20/99	178	3-SW	Wall	ND (0.36)	ND (0.36)	ND (0.36)	ND (0.36)	ND (0.36)	0.62 (0.36)	ND (0.36)	26.0

TABLE 5.1

**FINAL PCB SOIL VERIFICATION SAMPLE RESULTS
REMOVAL ACTION CONSTRUCTION REPORT
TEXTILE ROAD SITE
WASHTENAW COUNTY, MICHIGAN**

Sample Id.	Date	Sample No	Area	Type	Polychlorinated Biphenyl (PCB) Soil Results (mg/kg)								Cleanup
					Aroclor 1016	Aroclor 1221	Aroclor 1232	Aroclor 1242	Aroclor 1248	Aroclor 1254	Aroclor 1260	Level (mg/kg)	
S-4770-122099-NOVA-179	12/20/99	179	3-SW	Wall	ND (0.5)	ND (0.5)	ND (0.5)	ND (0.5)	ND (0.5)	ND (0.5)	ND (0.5)	26.0	
S-4770-010300-NOVA-230	01/03/00	230	3-SW	Wall	ND (2.5)	ND (5.2)	ND (2.5)	ND (2.5)	ND (2.5)	14 (2.5)	ND (2.5)	26.0	
S-4770-010300-NOVA-231	01/03/00	231	3-SW	Duplicate of 230	ND (0.51)	ND (0.51)	ND (0.51)	ND (0.51)	ND (0.51)	ND (0.51)	ND (0.51)	26.0	
S-4770-010500-NOVA-263	01/05/00	263	3-SW		Floor	ND (1.7)	ND (3.5)	ND (1.7)	ND (1.7)	ND (1.7)	4.5 (1.7)	ND (1.7)	26.0
S-4770-010700-SM-273	01/07/00	273	3-SW	Floor	ND (0.41)	ND (0.41)	ND (0.41)	ND (0.41)	ND (0.41)	ND (0.41)	ND (0.41)	26.0	
S-4770-011100-NOVA-294	01/11/00	294	3-SW	Wall	ND (0.34)	ND (0.7)	ND (0.34)	ND (0.34)	ND (0.34)	0.97 (0.34)	ND (0.34)	26.0	
S-4770-120299-NOVA-080	12/02/99	080	4	Wall	ND (2.3)	ND (4.7)	ND (2.3)	ND (2.3)	ND (2.3)	21 (2.3)	ND (2.3)	26.0	
S-4770-120299-NOVA-081	12/02/99	081	4	Wall	ND (0.34)	ND (0.34)	ND (0.34)	ND (0.34)	ND (0.34)	ND (0.34)	ND (0.34)	26.0	
S-4770-120299-NOVA-082	12/02/99	082	4	Wall	ND (0.55)	ND (0.55)	ND (0.55)	ND (0.55)	ND (0.55)	ND (0.55)	ND (0.55)	26.0	
S-4770-120299-NOVA-083	12/02/99	083	4	Wall	ND (0.69)	ND (1.4)	ND (0.69)	ND (0.69)	ND (0.69)	5.2 (0.69)	ND (0.69)	26.0	
S-4770-120299-NOVA-084	12/02/99	084	4	Wall	ND (1.1)	ND (2.1)	ND (1.1)	ND (1.1)	ND (1.1)	11 (1.1)	ND (1.1)	26.0	
S-4770-120299-NOVA-087	12/02/99	087	4	Wall	ND (1.6)	ND (3.2)	ND (1.6)	ND (1.6)	ND (1.6)	18 (1.6)	ND (1.6)	26.0	
S-4770-120299-NOVA-088	12/02/99	088	4	Floor	ND (0.65)	ND (1.3)	ND (0.65)	ND (0.65)	ND (0.65)	2.2 (0.65)	ND (0.65)	26.0	
S-4770-120299-NOVA-092	12/02/99	092	4	Duplicate of 091	ND (0.6)	ND (1.2)	ND (0.6)	ND (0.6)	ND (0.6)	4.9 (0.6)	ND (0.6)	26.0	
S-4770-120299-NOVA-093	12/02/99	093	4		Floor	ND (1.4)	ND (2.8)	ND (1.4)	ND (1.4)	ND (1.4)	18 (1.4)	ND (1.4)	26.0
S-4770-120299-NOVA-094	12/02/99	094	4	Floor	ND (0.36)	ND (0.36)	ND (0.36)	ND (0.36)	ND (0.36)	ND (0.36)	ND (0.36)	26.0	
S-4770-120899-NOVA-109	12/08/99	109	4	Wall	ND (2)	ND (4)	ND (2)	ND (2)	ND (2)	19 (2)	ND (2)	26.0	
S-4770-120899-NOVA-113	12/08/99	113	4	Wall	ND (4.1)	ND (8.3)	ND (4.1)	ND (4.1)	ND (4.1)	24 (4.1)	ND (4.1)	26.0	
S-4770-120899-NOVA-115	12/08/99	115	4	Wall	ND (0.34)	ND (0.34)	ND (0.34)	ND (0.34)	ND (0.34)	ND (0.34)	ND (0.34)	26.0	
S-4770-120899-NOVA-120	12/08/99	120	4	Floor	ND (0.38)	ND (0.78)	ND (0.38)	ND (0.38)	ND (0.38)	1.9 (0.38)	ND (0.38)	26.0	
S-4770-120899-NOVA-121	12/08/99	121	4	Floor	ND (1.8)	ND (3.7)	ND (1.8)	ND (1.8)	ND (1.8)	8.8 (1.8)	ND (1.8)	26.0	
S-4770-120899-NOVA-122	12/08/99	122	4	Floor	ND (0.35)	ND (0.35)	ND (0.35)	ND (0.35)	ND (0.35)	1.1 (0.35)	ND (0.35)	26.0	
S-4770-120899-NOVA-123	12/08/99	123	4	Floor	ND (1.4)	ND (2.7)	ND (1.4)	ND (1.4)	ND (1.4)	8.1 (1.4)	ND (1.4)	26.0	
S-4770-120899-NOVA-124	12/08/99	124	4	Floor	ND (1)	ND (2.1)	ND (1)	ND (1)	ND (1)	7.0 (1)	ND (1)	26.0	
S-4770-121099-NOVA-126	12/10/99	126	4	Floor	ND (0.45)	ND (0.46)	ND (0.45)	ND (0.45)	ND (0.45)	1.9 (0.45)	ND (0.45)	26.0	
S-4770-121099-NOVA-127	12/10/99	127	4	Duplicate of 126	ND (0.47)	ND (0.96)	ND (0.47)	ND (0.47)	ND (0.47)	0.55 (0.47)	ND (0.47)	26.0	
S-4770-121099-NOVA-128	12/10/99	128	4		Floor	ND (0.53)	ND (1.1)	ND (0.53)	ND (0.53)	ND (0.53)	1.3 (0.53)	ND (0.53)	26.0
S-4770-121099-NOVA-129	12/10/99	129	4	Floor	ND (0.59)	ND (0.59)	ND (0.59)	ND (0.59)	ND (0.59)	ND (0.59)	ND (0.59)	26.0	
S-4770-121099-NOVA-130	12/10/99	130	4	Floor	ND (0.58)	ND (0.58)	ND (0.58)	ND (0.58)	ND (0.58)	0.78 (0.58)	ND (0.58)	26.0	
S-4770-121099-NOVA-131	12/10/99	131	4	Floor	ND (0.55)	ND (0.55)	ND (0.55)	ND (0.55)	ND (0.55)	ND (0.55)	ND (0.55)	26.0	
S-4770-121399-NOVA-137	12/13/99	137	4	Floor	ND (0.41)	ND (0.41)	ND (0.41)	ND (0.41)	ND (0.41)	1.9 (0.41)	ND (0.41)	26.0	
S-4770-121399-NOVA-138	12/13/99	138	4	Floor	ND (0.62)	ND (1.3)	ND (0.62)	ND (0.62)	ND (0.62)	11 (0.62)	ND (0.62)	26.0	
S-4770-121399-NOVA-139	12/13/99	139	4	Wall	ND (0.37)	ND (0.37)	ND (0.37)	ND (0.37)	ND (0.37)	1.0 (0.37)	ND (0.37)	26.0	
S-4770-121399-NOVA-140	12/13/99	140	4	Wall	ND (0.39)	ND (0.8)	ND (0.39)	ND (0.39)	ND (0.39)	5.1 (0.39)	ND (0.39)	26.0	
S-4770-121399-NOVA-141	12/13/99	141	4	Wall	ND (0.42)	ND (0.42)	ND (0.42)	ND (0.42)	ND (0.42)	ND (0.42)	ND (0.42)	26.0	
S-4770-121399-NOVA-142	12/13/99	142	4	Floor	ND (0.73)	ND (1.5)	ND (0.73)	ND (0.73)	ND (0.73)	7.1 (0.73)	ND (0.73)	26.0	
S-4770-121399-NOVA-144	12/13/99	144	4	Floor	ND (0.63)	ND (1.3)	ND (0.63)	ND (0.63)	ND (0.63)	1.3 (0.63)	ND (0.63)	26.0	
S-4770-121399-NOVA-145	12/13/99	145	4	Floor	ND (10)	ND (20)	ND (10)	ND (10)	ND (10)	29 (10)	ND (10)	26.0	
S-4770-121399-NOVA-146	12/13/99	146	4	Floor	ND (0.63)	ND (0.63)	ND (0.63)	ND (0.63)	ND (0.63)	1.5 (0.63)	ND (0.63)	26.0	

TABLE 5.1

**FINAL PCB SOIL VERIFICATION SAMPLE RESULTS
REMOVAL ACTION CONSTRUCTION REPORT
TEXTILE ROAD SITE
WASHTENAW COUNTY, MICHIGAN**

Sample Id.	Date	Sample No	Area	Type	Polychlorinated Biphenyl (PCB) Soil Results (mg/kg)								Cleanup
					Aroclor 1016	Aroclor 1221	Aroclor 1232	Aroclor 1242	Aroclor 1248	Aroclor 1254	Aroclor 1260	Level (mg/kg)	
S-4770-121399-NOVA-147	12/13/99	147	4	Wall	ND (0.52)	ND (0.52)	ND (0.52)	ND (0.52)	ND (0.52)	ND (0.52)	ND (0.52)	26.0	
S-4770-121399-NOVA-148	12/13/99	148	4	Wall	ND (2.2)	ND (4.5)	ND (2.2)	ND (2.2)	ND (2.2)	31 (2.2)	ND (2.2)	26.0	
S-4770-121399-NOVA-151	12/13/99	151	4	Wall	ND (0.43)	ND (0.43)	ND (0.43)	ND (0.43)	ND (0.43)	1.3 (0.43)	ND (0.43)	26.0	
S-4770-121399-NOVA-152	12/13/99	152	4	Wall	ND (0.78)	ND (1.6)	ND (0.78)	ND (0.78)	ND (0.78)	6.0 (0.78)	ND (0.78)	26.0	
S-4770-121399-NOVA-154	12/13/99	154	4	Duplicate of 140	ND (1.7)	ND (3.4)	ND (1.7)	ND (1.7)	ND (1.7)	24 (1.7)	ND (1.7)	26.0	
S-4770-121599-NOVA-155	12/15/99	155	4	Floor	ND (0.8)	ND (1.6)	ND (0.8)	ND (0.8)	ND (0.8)	7.4 (0.8)	ND (0.8)	26.0	
S-4770-121599-NOVA-156	12/15/99	156	4	Duplicate of 155	ND (0.75)	ND (1.5)	ND (0.75)	ND (0.75)	ND (0.75)	7.2 (0.75)	ND (0.75)	26.0	
S-4770-121599-NOVA-157	12/15/99	157	4	Wall	ND (0.54)	ND (1.1)	ND (0.54)	ND (0.54)	ND (0.54)	3.8 (0.54)	ND (0.54)	26.0	
S-4770-121599-NOVA-158	12/15/99	158	4	Wall	ND (0.34)	ND (0.69)	ND (0.34)	ND (0.34)	ND (0.34)	0.72 (0.34)	ND (0.34)	26.0	
S-4770-121599-NOVA-159	12/15/99	159	4	Wall	ND (0.45)	ND (0.92)	ND (0.45)	ND (0.45)	ND (0.45)	4.9 (0.45)	ND (0.45)	26.0	
S-4770-122199-NOVA-185	12/21/99	185	4	Wall	ND (0.35)	ND (0.35)	ND (0.35)	ND (0.35)	ND (0.35)	ND (0.35)	ND (0.35)	26.0	
S-4770-122199-NOVA-186	12/21/99	186	4	Wall	ND (0.34)	ND (0.34)	ND (0.34)	ND (0.34)	ND (0.34)	1.7 (0.34)	ND (0.34)	26.0	
S-4770-122199-NOVA-195	12/21/99	195	4	Wall	ND (1.9)	ND (3.8)	ND (1.9)	ND (1.9)	ND (1.9)	18 (1.9)	ND (1.9)	26.0	
S-4770-122299-NOVA-196	12/22/99	196	4	Wall	ND (0.41)	ND (0.41)	ND (0.41)	ND (0.41)	ND (0.41)	0.56 (0.41)	ND (0.41)	26.0	
S-4770-122299-NOVA-197	12/22/99	197	4	Wall	ND (0.48)	ND (0.48)	ND (0.48)	ND (0.48)	ND (0.48)	ND (0.48)	ND (0.48)	26.0	
S-4770-122299-NOVA-199	12/22/99	199	4	Floor	ND (0.39)	ND (0.39)	ND (0.39)	ND (0.39)	ND (0.39)	ND (0.39)	ND (0.39)	26.0	
S-4770-122299-NOVA-200	12/22/99	200	4	Wall	ND (0.34)	ND (0.34)	ND (0.34)	ND (0.34)	ND (0.34)	ND (0.34)	ND (0.34)	26.0	
S-4770-122299-NOVA-201	12/22/99	201	4	Floor	ND (0.99)	ND (2)	ND (0.99)	ND (0.99)	ND (0.99)	8.9 (0.99)	ND (0.99)	26.0	
S-4770-122299-NOVA-202	12/22/99	202	4	Floor	ND (0.37)	ND (0.37)	ND (0.37)	ND (0.37)	ND (0.37)	ND (0.37)	ND (0.37)	26.0	
S-4770-122299-NOVA-206	12/22/99	206	4	Floor	ND (0.38)	ND (0.38)	ND (0.38)	ND (0.38)	ND (0.38)	ND (0.38)	ND (0.38)	26.0	
S-4770-122299-NOVA-208	12/22/99	208	4	Floor	ND (0.39)	ND (0.39)	ND (0.39)	ND (0.39)	ND (0.39)	ND (0.39)	ND (0.39)	26.0	
S-4770-122299-NOVA-209	12/22/99	209	4	Floor	ND (0.4)	ND (0.4)	ND (0.4)	ND (0.4)	ND (0.4)	ND (0.4)	ND (0.4)	26.0	
S-4770-010300-NOVA-222	01/03/00	222	4	Wall	ND (0.56)	ND (0.56)	ND (0.56)	ND (0.56)	ND (0.56)	ND (0.56)	ND (0.56)	26.0	
S-4770-010300-NOVA-223	01/03/00	223	4	Floor	ND (0.4)	ND (0.4)	ND (0.4)	ND (0.4)	ND (0.4)	ND (0.4)	ND (0.4)	26.0	
S-4770-010400-NOVA-252	01/04/00	252	4	Floor	ND (0.37)	ND (0.37)	ND (0.37)	ND (0.37)	ND (0.37)	ND (0.37)	ND (0.37)	26.0	
S-4770-010400-NOVA-253	01/04/00	253	4	Floor	ND (4.6)	ND (9.4)	ND (4.6)	ND (4.6)	ND (4.6)	21 (4.6)	ND (4.6)	26.0	
S-4770-010500-SM-266	01/05/00	266	4	Wall	ND (1.1)	ND (2.3)	ND (1.1)	ND (1.1)	ND (1.1)	22 (1.1)	ND (1.1)	26.0	
S-4770-010700-SM-280	01/07/00	280	4	Floor	ND (0.88)	ND (1.8)	ND (0.88)	ND (0.88)	ND (0.88)	3.7 (0.88)	ND (0.88)	26.0	
S-4770-010400-NOVA-240	01/04/00	240	5	Floor	ND (0.39)	ND (0.39)	ND (0.39)	ND (0.39)	ND (0.39)	ND (0.39)	ND (0.39)	1.2	
S-4770-010400-NOVA-241	01/04/00	241	5	Floor	ND (0.42)	ND (0.42)	ND (0.42)	ND (0.42)	ND (0.42)	ND (0.42)	ND (0.42)	1.2	
S-4770-010400-NOVA-243	01/04/00	243	5	Wall	ND (0.35)	ND (0.35)	ND (0.35)	ND (0.35)	ND (0.35)	ND (0.35)	ND (0.35)	1.2	
S-4770-010400-NOVA-245	01/04/00	245	5	Floor	ND (0.39)	ND (0.39)	ND (0.39)	ND (0.39)	ND (0.39)	ND (0.39)	ND (0.39)	1.2	
S-4770-010400-NOVA-246	01/04/00	246	5	Floor	ND (0.59)	ND (1.2)	ND (0.59)	ND (0.59)	ND (0.59)	3.8 (0.59)	ND (0.59)	1.2	
S-4770-010400-NOVA-247	01/04/00	247	5	Wall	ND (0.42)	ND (0.42)	ND (0.42)	ND (0.42)	ND (0.42)	ND (0.42)	ND (0.42)	1.2	
S-4770-010400-NOVA-248	01/04/00	248	5	Wall	ND (0.52)	ND (0.52)	ND (0.52)	ND (0.52)	ND (0.52)	ND (0.52)	ND (0.52)	1.2	
S-4770-010400-NOVA-249	01/04/00	249	5	Wall	ND (0.45)	ND (0.45)	ND (0.45)	ND (0.45)	ND (0.45)	ND (0.45)	ND (0.45)	1.2	
S-4770-010400-NOVA-250	01/04/00	250	5	Wall	ND (0.52)	ND (0.52)	ND (0.52)	ND (0.52)	ND (0.52)	ND (0.52)	ND (0.52)	1.2	
S-4770-010400-NOVA-251	01/04/00	251	5	Floor	ND (0.49)	ND (0.99)	ND (0.49)	ND (0.49)	ND (0.49)	ND (0.49)	ND (0.49)	1.2	
S-4770-010400-NOVA-256	01/04/00	256	5	Duplicate of 240	ND (0.41)	ND (0.41)	ND (0.41)	ND (0.41)	ND (0.41)	ND (0.41)	ND (0.41)	1.2	

TABLE 5.1

**FINAL PCB SOIL VERIFICATION SAMPLE RESULTS
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TEXTILE ROAD SITE
WASHTENAW COUNTY, MICHIGAN**

Sample Id.	Date	Sample No	Area	Type	<u>Polychlorinated Biphenyl (PCB) Soil Results (mg/kg)</u>							Cleanup Level (mg/kg)
					Aroclor 1016	Aroclor 1221	Aroclor 1232	Aroclor 1242	Aroclor 1248	Aroclor 1254	Aroclor 1260	
S-4770-011200-NOVA-318	01/12/00	318	5	Floor	ND (0.41)	ND (0.41)	ND (0.41)	ND (0.41)	ND (0.41)	ND (0.41)	ND (0.41)	1.2
S-4770-011200-NOVA-319	01/12/00	319	5	Duplicate of 318	ND (0.4)	ND (0.4)	ND (0.4)	ND (0.4)	ND (0.4)	ND (0.4)	ND (0.4)	1.2
S-4770-011200-NOVA-320	01/12/00	320	5	Floor	ND (0.41)	ND (0.41)	ND (0.41)	ND (0.41)	ND (0.41)	ND (0.41)	ND (0.41)	1.2
S-4770-011300-NOVA-323	01/13/00	323	5	Wall	ND (0.48)	ND (0.48)	ND (0.48)	ND (0.48)	ND (0.48)	ND (0.48)	ND (0.48)	1.2
S-4770-011300-NOVA-324	01/13/00	324	5	Floor	ND (0.41)	ND (0.41)	ND (0.41)	ND (0.41)	ND (0.41)	ND (0.41)	ND (0.41)	1.2
S-4770-011300-NOVA-325	01/13/00	325	5	Wall	ND (0.46)	ND (0.46)	ND (0.46)	ND (0.46)	ND (0.46)	ND (0.46)	ND (0.46)	1.2
S-4770-012000-NOVA-332	01/20/00	332	5	Floor	ND (0.34)	ND (0.34)	ND (0.34)	ND (0.34)	ND (0.34)	ND (0.34)	ND (0.34)	1.2
S-4770-012000-NOVA-333	01/20/00	333	5	Floor	ND (0.38)	ND (0.38)	ND (0.38)	ND (0.38)	ND (0.38)	ND (0.38)	ND (0.38)	1.2
S-4770-020100-SM-399	02/01/00	399	5	Floor	ND (0.4)	ND (0.4)	ND (0.4)	ND (0.4)	ND (0.4)	ND (0.4)	ND (0.4)	1.2

Notes:

ND - Not Detected at the Reporting Limit

TABLE 5.2

**VOC AND SVOC VERIFICATION RESULTS
REMOVAL ACTION CONSTRUCTION REPORT
TEXTILE ROAD SITE
WASHTENAW COUNTY, MICHIGAN**

<i>Sample Id.</i>	<i>Date</i>	<i>Sample No.</i>	<i>Area</i>		<i>Cleanup Level (ug/kg)</i>
S-4770-010400-NOVA-254	01/04/00	254	1-W		2,300
S-4770-010400-NOVA-255	01/04/00	255	1-W		2,300
S-4770-010400-NOVA-257	01/04/00	257	1-W	ND (50)	300
S-4770-010400-NOVA-259	01/04/00	259	1-W	ND (50)	300
S-4770-020200-NOVA-409	02/02/00	409	1-S		2,300
S-4770-020200-NOVA-423	02/02/00	423	1-S	ND (50)	300
S-4770-021000-SM-447	02/10/00	447	1-S		2,300
S-4770-021000-SM-448	02/10/00	448	1-S	ND (50)	300
S-4770-012500-NOVA-393 ⁽¹⁾	01/25/00	393	2		2,300
S-4770-012500-NOVA-394	01/25/00	394	2		2,300
S-4770-012500-NOVA-397	01/25/00	397	2	ND (50)	300
S-4770-012500-NOVA-398 ⁽²⁾	01/25/00	398	2	ND (50)	300
S-4770-122299-NOVA-213	12/22/99	213	3-NW		2,300
S-4770-122299-NOVA-214	12/22/99	214	3-NW	ND (50)	300
S-4770-011000-NOVA-283	01/10/00	283	3-SE	ND (50)	300
S-4770-011000-NOVA-291	01/10/00	291	3-SE		2,300
S-4770-011200-NOVA-298	01/12/00	298	3-SW	ND (50)	300
S-4770-011200-NOVA-299	01/12/00	299	3-SW		2,300
S-4770-011200-NOVA-300	01/12/00	300	3-SW	ND (50)	300
S-4770-011200-NOVA-301	01/12/00	301	3-SW		2,300
S-4770-011200-NOVA-302	01/12/00	302	3-NE	ND (50)	300
S-4770-011200-NOVA-303	01/12/00	303	3-NE		2,300
S-4770-122299-NOVA-210	12/22/99	210	4		2,300
S-4770-122299-NOVA-211	12/22/99	211	4	ND (50)	300
S-4770-122299-NOVA-212	12/22/99	212	4	ND (50)	300
S-4770-010700-NOVA-271	01/07/00	271	4		2,300
S-4770-011000-NOVA-282	01/10/00	282	4	ND (50)	300
S-4770-011000-NOVA-290	01/10/00	290	4		2,300
S-4770-010400-NOVA-251	01/04/00	251	5		2,300
S-4770-010400-NOVA-258	01/04/00	258	5	ND (50)	300
S-4770-012500-NOVA-391	01/25/00	391	5		2,300
S-4770-012500-NOVA-392	01/25/00	392	5		2,300
S-4770-012500-NOVA-395	01/25/00	395	5	ND (50)	300
S-4770-012500-NOVA-396	01/25/00	396	5	ND (50)	300

Notes:

ND - Not Detected at the Reporting Limit

(1) - Sample did not meet criteria, re-excavated and sampled as Sample No. 394

(2) - QA/AC Duplicate

TABLE 5.3

**SURFACE WATER SAMPLE RESULTS
REMOVAL ACTION CONSTRUCTION REPORT
TEXTILE ROAD SITE
WASHTENAW COUNTY, MICHIGAN**

<i>Sample ID</i>	<i>L-4770-010600-SM269</i>	<i>W-4770-062200-DRD-001</i>
<i>Date Sampled</i>	<i>01/06/00</i>	<i>06/22/00</i>

Volatile Organic Compounds (VOCs), ug/L

Vinyl Chloride	NA	ND (2)
Methylene Chloride	NA	

Semi Volatile Organic Compounds (SVOCs), ug/L

Phenanthrene	NA	ND (5)
--------------	----	--------

Polychlorinated Biphenyls (PCBs), ug/L

Aroclor 1016	ND (1)	ND (1)
Aroclor 1221	ND (1)	ND (1)
Aroclor 1232	ND (1)	ND (1)
Aroclor 1242	ND (1)	ND (1)
Aroclor 1248	ND (1)	ND (1)
Aroclor 1254	ND (1)	ND (1)
Aroclor 1260	ND (1)	ND (1)

Inorganics, mg/L

Beryllium	NA	ND (0.005)
Iron	NA	ND (0.1)
Manganese	NA	0.045 (0.015)

Notes:

NA - Not Analyzed

ND - Not Detected at Reporting Limit

TABLE 5.4

**EXCAVATION WATER SAMPLE RESULTS
REMOVAL ACTION CONSTRUCTION REPORT
TEXTILE ROAD SITE
WASHTENAW COUNTY, MICHIGAN**

<i>Sample ID</i>	<i>L-4770-010400-SM260</i>	<i>L-4770-010600-SM270</i>	<i>L-4770-012000-SM347</i>
<i>Date Sampled</i>	<i>01/04/00</i>	<i>01/06/00</i>	<i>01/12/00</i>

Volatile Organic Compounds (VOCs), ug/L

Vinyl Chloride	NA	NA	NA
----------------	----	----	----

Semi Volatile Organic Compounds (SVOCs), ug/L

Phenanthrene	NA	NA	NA
--------------	----	----	----

Polychlorinated Biphenyls (PCBs), ug/L

Aroclor 1016	ND (4)	ND (4)	ND (1)
Aroclor 1221	ND (4)	ND (4)	ND (1)
Aroclor 1232	ND (4)	ND (4)	ND (1)
Aroclor 1242	ND (4)	ND (4)	ND (1)
Aroclor 1248	ND (4)	ND (4)	ND (1)
Aroclor 1254	17 (4)	14 (4)	1.4 (1)
Aroclor 1260	ND (4)	ND (4)	ND (1)

Inorganic, mg/L

Beryllium	NA	NA	NA
Iron	NA	NA	NA
Manganese	NA	NA	NA

Notes:

MDL - Method Detection Limit

NA - Not Analyzed

TABLE 7.1
REMOVAL ACTION EXCAVATION, BACKFILL, AND DISPOSAL SUMMARY
REMOVAL ACTION CONSTRUCTION REPORT
TEXTILE ROAD SITE
WASHTENAW COUNTY, MICHIGAN

Excavation Area	In Place Volume (1) (cu. yd.)	Excavated Volume (2) (cu. yd.)	Material Sent off-Site				Volume Backfilled on-Site (cu.yd.) (3)
			Carleton Farms		Wayne Disposal		
			Truck Volume (cu. yd.)	Tonnage (tons)	Truck Volume (cu. yd.)	Tonnage (tons)	
EA1 - E/C	1,156	1,213	-	-	-	-	1,213
EA1 - W	841	883	277	305	135	149	471
EA1 - S	795	810	380	390	430	446	-
Subtotal EA1	2,791	2,906	657	695	565	594	1,684
EA2	2,262	2,556	1,297	1,484	859	945	400
EA3 - NE	802	822	495	550	327	359	-
EA3 - SE	1,156	1,185	715	782	471	517	-
EA3 - SW	247	253	152	162	100	110	-
EA3 - NW	2,456	2,641	632	805	1,000	1,098	1,009
Subtotal EA3	4,661	4,901	1,994	2,299	1,898	2,084	1,009
EA4	6,039	6,158	1,114	1,136	5,044	5,549	-
EA5	1,620	1,701	30	33	-	-	1,671
TOTAL	17,373	18,222	5,092	5,647	8,366	9,172	4,763

Notes:

- (1) - Refer to Table 4.4 for calculations, estimated based on survey information.
- (2) - Estimated based on-Site equipment and off-Site truck capacities.
- (3) - Represents ex-situ volume.

TABLE 7.2

**REMOVAL ACTION COST SUMMARY
TEXTILE ROAD SITE REMOVAL ACTION
WASHTENAW COUNTY, MICHIGAN**

Removal Action Contractors

A. Mob/Demob, Construction Facilities, etc.	\$199,000
B. Excavation, Backfilling, & Grading	\$125,100
C. Transportation & Off-Site Disposal	\$1,124,600
D. On-Site Waste Consolidation Cover	\$72,000
E. Monitoring Well Installation & Abandonment	\$8,900
Subtotal	<u>\$1,529,600</u>

Engineering/Construction Contract Administration & Management

A. Conestoga-Rovers & Associates	\$180,000
B. Air Monitoring Sample Analysis	\$17,700
C. Verification Sampling & Analysis	\$87,700
Subtotal	<u>\$285,400</u>

U.S. EPA Oversight Costs

A. Reimbursement of Costs for AOC	\$194,882
B. U.S. EPA Costs Invoiced to February 2000	\$60,229
C. U.S. EA Costs March to September 2000	\$0 ⁽¹⁾
Subtotal	<u>\$255,111</u>
Total	<u><u>\$2,070,111</u></u>

Note:

- ⁽¹⁾ U.S. EPA oversight costs for the period of March to September 2000 have not been invoiced to the Group at this time.

APPENDIX A

PROPERTY ZONING CONSENT JUDGEMENT

MCLAIN & WINTERS

4770

ATTORNEYS AND COUNSELORS AT LAW

61 N. HURON
YPSILANTI, MICHIGAN 48197
(734) 481-1120

DENNIS O. McLAIN
WM. DOUGLAS WINTERS
ANGELA B. KING

FAX (734) 481-8909
E-MAIL: mwatty@voyager.net

November 15, 1999

Peter Felitti
U.S. EPA, Region 5
77 W. Jackson Blvd., C-14J
Chicago, IL 60604-3590

Rec'd CRA
NOV 22 1999

Re: EPA/Textile Road Site

Consent Judgment Including Declaratory Relief entered 10/27/99

Dear Mr. Felitti:

Please find enclosed a "*True Copy*" of the *Consent Judgment Including Declaratory Relief* entered by Washtenaw County Circuit Court Judge Donald E. Shelton on October 27, 1999 which revised or amended the zoning boundaries between the commercial and residential property as illustrated in Exhibit C attached thereto.

This *Exhibit C* is, of course, the same document referenced as "*Figure 1.4*" in the *Removal Action Work Plan* which was approved by the "*Textile Road Site Cooperating Parties Group*," as well as the U.S. EPA on September 23, 1999.

While I realize your office has probably already received a copy of the *Consent Judgment Including Declaratory Relief*, since I had previously advised I would forward a copy of said *Judgment* upon entry by the Court, I wanted to take a moment and forward a copy of said *Consent Judgment* so as to insure your file would be complete in all matters pertaining to the revised "*commercial/residential zoning boundary*" at the Textile Road site.

If after review of the *Consent Judgment* you have any questions or I can be of further assistance, please contact me.

Very truly yours,

Wm. Douglas Winters

rsk
enclosures

cc: P.C. Lall
Denise Gawlinski
Troy Taylor
David Novello
Edward Peterson
Gregory A. Carli
Karen Lovejoy Roe
Brenda L. Stumbo
Larry Doe

MCLAIN & WINTERS

ATTORNEYS AND COUNSELORS AT LAW

61 N. HURON
YPSILANTI, MICHIGAN 48197
(734) 481-1120

DENNIS O. McLAIN
WM. DOUGLAS WINTERS
ANGELA B. KING

FAX (734) 481-8909
E-MAIL: mwatty@voyager.net

November 15, 1999

Troy Taylor
Attorney at Law
41820 W. Six Mile, Ste. 103
Northville, MI 48167

Re: EPA/Textile Rd. site

Dear Troy:

As I am sure your file reflects, I previously received correspondence from Ed Peterson, dated November 2, 1999, in which, in accordance with the ***Consent Judgment***, he enclosed a check for \$10,000 made payable to the Charter Township of Ypsilanti, which has been remitted and processed accordingly. As we discussed during our conversation at the Washtenaw County Courthouse on October 27, 1999, once the "***clean up***" of the Textile Road Site has been completed and approved by the U.S. EPA, the constituent members of the Textile Road Site Group will then "***quit claim***" their respective interests to the party or parties who in turn will execute the "***Deed Restrictions***" pertaining to a mobile home park as set forth in the ***Consent Judgment***. I would appreciate if you would keep me apprised as to when the constituent members of the Textile Road Site Group transfer their respective legal interests so as to insure the "***Deed Restrictions***" are recorded with the Washtenaw County Register of Deeds.

In that regard, it is my understanding the ***Consent Judgment Including Declaratory Relief*** has been filed with the Washtenaw County Register of Deeds and I would appreciate if you would confirm the Liber and Page number reflected on said ***Consent Judgment***, as well as forward a copy of the recorded ***Consent Judgment*** once it has been received from the Register of Deeds.

In addition, I previously received "***transmittal correspondence***" from Project Manager Greg Carli, dated October 28, 1999, in which he advised that the parties were currently in the process of obtaining a "***...legal survey of the zoning boundary at this time***" and, as stated by Mr. Carli, a copy will be forwarded both to my attention and the Township upon completion of that survey. I would appreciate if you would continue to keep me apprised as to the status of that survey so as to insure that issue can be brought to closure as soon as possible.

Troy Taylor
re: EPA/Textile Rd. Site
November 15, 1999
page 2

Finally, please find enclosed a copy of a letter addressed to U.S. EPA attorney Peter Felitti confirming the entry of the *Consent Judgment* which amended and revised the zoning boundary separating the commercial and residential property at the Textile Road Site. As stated to Mr. Felitti, this "revised zoning boundary" referred to as "*Exhibit C*" in the *Consent Judgment* is, of course, the same document referred to as Figure 1.4 in the approved *Removal Action Work Plan*.

In closing, I would appreciate if you, along with Mr. Peterson and Mr. Carli, keep me apprised as to the status of the clean up being conducted at the Textile Road Site so as to insure all parties are in compliance with both the letter and spirit of the *Administrative Consent Order*, *Removal Action Work Plan*, and the *Consent Judgment Including Declaratory Relief*.

If after review of this correspondence you have any questions or I can be of further assistance, please contact me. Thanking you in advance for your continued courtesy and cooperation, I remain...

Very truly yours,

Wm. Douglas Winters

rsk.

enclosures

cc: David Novello
Ed Peterson
Greg Carli
Karen Lovejoy Roe
Brenda L. Stumbo
Larry Doe
Bob Beaugrand

STATE OF MICHIGAN

IN THE CIRCUIT COURT FOR THE COUNTY OF WASHTENAW

GENERAL MOTORS CORPORATION, a
Delaware corporation and HOLTZMAN-
SILVERMAN REALTY CO., a Michigan
co-partnership,

Plaintiffs and Counter-Defendants,

vs

THE CHARTER TOWNSHIP OF YPSILANTI,
a Michigan municipal corporation,

Defendant and Counter-Plaintiff.

Case No. 99- 11047 -CE
Hon. *Donald E. Shelton*

A TRUE COPY
[Signature]
ATTORNEY AT LAW

CONSENT JUDGMENT INCLUDING DECLARATORY RELIEF

OCT 27 1999

This matter having come to be heard upon the motion of the Plaintiffs and Counter-Plaintiff for an entry of a Consent Judgment Including Declaratory Relief. The Defendant and the Counter-Defendants deny liability but consent to a settlement of these claims as set forth in this Consent Judgment. There being no objections to this Consent Judgment and it appearing to the Court that a judgment should be entered:

IT IS HEREBY ORDERED AND ADJUDGED, that the Administrative Order by Consent ("AOC") and Work Plan ("Work Plan") attached to the Complaint and incorporated into this Order by reference set forth an appropriate cleanup plan for the Textile Road Site. Implementation of the cleanup plan can best proceed if the zoning boundaries are amended to conform with Exhibit C to the Complaint which is attached hereto.

IT IS ACCORDINGLY FURTHER ORDERED AND ADJUDGED, that effective upon execution of this Consent Judgment, the zoning boundaries of the Textile Road property, being the west 1019.04 feet of the northwest one-quarter (NW ¼) of Section 25, Town 3 South, Range 7 East, Ypsilanti Township, Washtenaw County, Michigan, sidwell no. 11-25-200-002, shall be and

hereby are amended as provided in Exhibit C to the Complaint and also attached hereto, which change shall be incorporated into the Township's zoning plats, plans and maps as soon as practicable.

IT IS FURTHER ORDERED AND ADJUDGED that except for temporary construction trailers, as may be required to implement the Work Plan or as may be permitted by the Township's normal temporary use permit process, the Textile Road Cooperating Parties shall restrict and prohibit any activity and/or use of said Textile Road property, as described above, for any purposes involving the placement, assemblage, or storage of "Mobile Homes", specifically including, but not limited to, the development of a "Mobile Home Park" defined by Ypsilanti Township Ordinance No. 74, adopted May 17, 1994, as follows:

Mobile home: Any building or structure, transportable in one or more sections, which is built on a chassis and designed to be sold as a dwelling with or without permanent foundation, when connected to the required utilities, and includes the plumbing, heating, air conditioning and electrical systems contained in the structure. Mobile home does not include recreational equipment.

Mobile home park: Any plot of ground upon which three or more mobile homes, occupied for dwelling or sleeping purposes, are located.

IT IS FURTHER ORDERED AND ADJUDGED that the activity and use restrictions defined herein shall run with the property and shall be binding upon all future owners, successors, lessees or assigns, and their authorized agents, employees, or persons acting under their direction and control, and shall continue until the Charter Township of Ypsilanti agrees to modify, amend or repeal said restrictions. In such case, the restrictive covenant shall be modified, amended or repealed by a written instrument between the Township and the then owner.

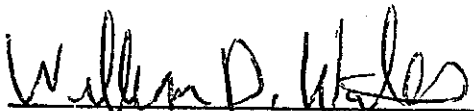
IT IS FURTHER ORDERED AND ADJUDGED that the Textile Road Cooperating Parties shall reimburse the Township \$10,000 within fifteen (15) days of the date of this Order.

IT IS FURTHER ORDERED AND ADJUDGED that the Textile Road Cooperating Parties' Complaint and the Counterclaim of the Township shall be dismissed with prejudice and without costs subject to the terms of this Order.

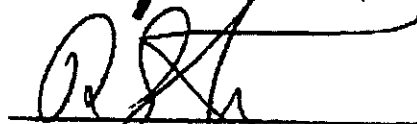
/s/ DONALD E. SHELTON

Circuit Court Judge

Consent to Entry:


William D. Winters (P28965)
Attorney for the Charter Township of Ypsilanti


Troy R. Taylor (P40776)
Attorney for General Motors Corporation


Richard G. Stoll
David P. Novello
Attorneys for Holtzman-Silverman Realty Co.

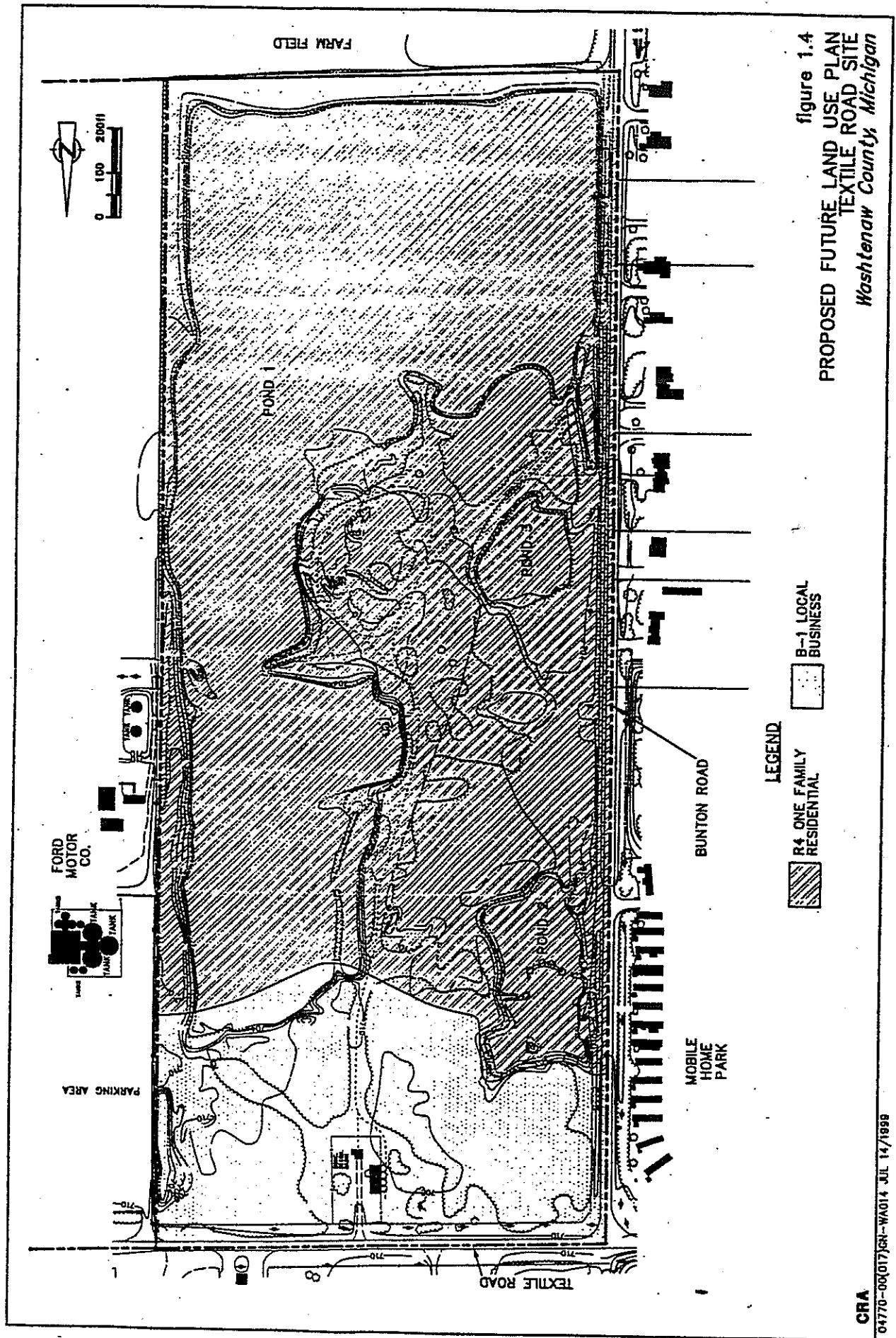


figure 1.4
 PROPOSED FUTURE LAND USE PLAN
 TEXTILE ROAD SITE
 Washtenaw County, Michigan

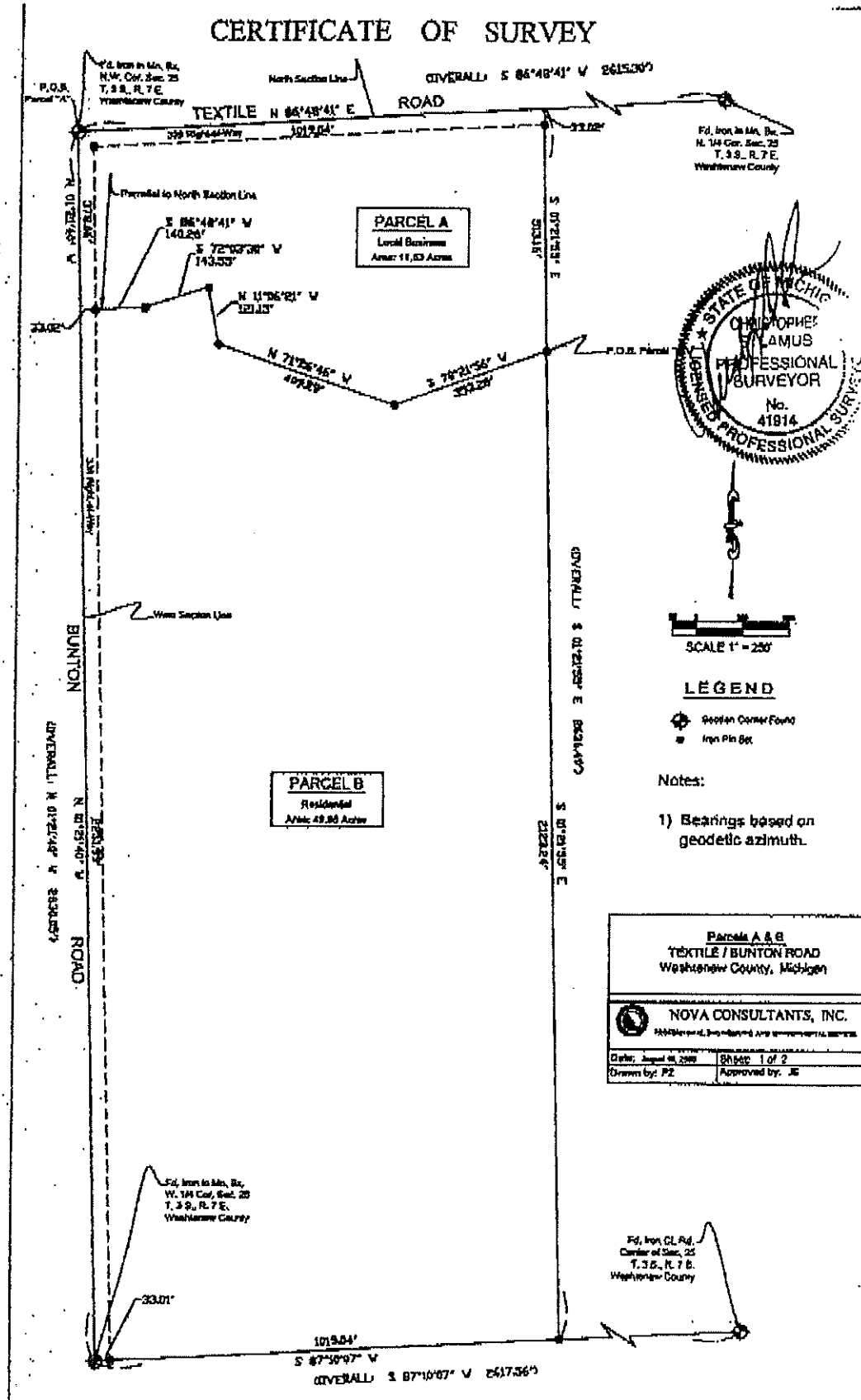
LEGEND

R4 ONE FAMILY RESIDENTIAL

B-1 LOCAL BUSINESS

CRA

04770-00(017)381-WA014 JUL 14/1898



CERTIFICATE OF SURVEY

Overall Legal Description (As Furnished by Client)

The West 1019.04' (15.14 chains in width) of the NW 1/4 of Section 25, Town 3 South, Range 7 East, Ypsilanti Township, Washtenaw County, Michigan. Subject to easements and restrictions of record, if any.

Parcel A Legal Description (North of Ponds - Local Business)

A Parcel being part of the NW 1/4 of Section 25, Town 3 South, Range 7 East, Ypsilanti Township, Washtenaw County, Michigan.

More Particularly Described as: Beginning at the NW corner (P.O.B.) of said Section 25, Thence N 86° 48' 41" E, along the North Section Line, 1019.04', Thence S 01° 21' 55" E 513.16', Thence S 70° 21' 56" W, 353.28', Thence N 71° 26' 46" W 409.29', Thence N 11° 06' 21" W 121.15', Thence S 72° 03' 30" W 143.55', Thence S 86° 48' 41" W, Parallel to the North Section Line, 140.26' to a point on the West Line of said Section, Thence N 01° 21' 40" W, along the West Section Line, 378.06' to the NW corner (P.O.B.) of said Section 25, Said parcel containing 11.63 acres of land, more or less, Subject to easements and restrictions of record, if any.

Parcel B Legal Description (Residential Area)

A Parcel being part of the NW 1/4 of Section 25, Town 3 South, Range 7 East, Ypsilanti Township, Washtenaw County, Michigan.

More Particularly Described as: Commencing at the NW corner of said Section 25, Thence N 86° 48' 41" E, along the North Section Line, 1019.04', Thence S 01° 21' 55" E 513.16' to the Point of Beginning (P.O.B.), Thence S 01° 21' 55" E 2123.24', Thence S 87° 10' 07" W 1019.04' to a point on the East - West 1/4 Line of said Section (As Monumented), Thence N 01° 21' 40" W, along the West Section Line, 2251.99', Thence N 86° 48' 41" E, Parallel to the North Section Line, 140.26', Thence N 72° 03' 30" E 143.55', Thence S 11° 06' 21" E 121.15', Thence S 71° 26' 46" E 409.29', Thence N 70° 21' 56" E 353.28' to the Point of Beginning (P.O.B.), Said parcel containing 49.95 acres of land, more or less, Subject to easements and restrictions of record, if any.

Witness to Section Corners

Witness to N.W. Corner

Fd. 1" Iron
N38°W 80.00' P.K. IN P. POLE
N02°E 158.85' P.K. IN P. POLE
S46°E 44.80' P.K. IN P. POLE
S21°W 80.50' P.K. IN P. POLE

Witness to N. 1/4 Corner

Fd. 1" Iron
N48°W 80.81' SPIKE IN P. POLE
N0°W 48.85' SPIKE IN P. POLE
S37°E 75.98' SPIKE IN P. POLE
S21°W 85.38' SPIKE IN 10" PIPE

Witness to W. 1/4 Corner

Fd. 1" Iron
N8°W 105.78' P.K. IN 24" TWIN ASH
S80°E 34.82' P.K. IN 12" ASH
S14°E 103.88' P.K. IN 18" MAPLE
N86°W 39.58' P.K. IN 30" ASH

Witness to Center of Section

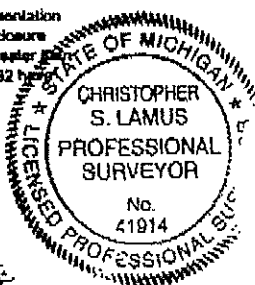
Fd. 1" Iron
N43°W 58.50' P.K. IN P. POLE
N78°E 76.32' P.K. IN P. POLE
S82°E 23.55' P.K. IN P. POLE
S58°W 80.88' P.K. IN SUPPORT POLE

SURVEYOR'S NOTES

1) PARCELS A & B SUBJECT TO ANY EASEMENTS OR RESTRICTIONS OF RECORD, IF ANY.

I hereby certify that this plat and description is a true representation of a survey made under my direction; and that the ratio of closure on the unadjusted field observations of such survey was greater than 1 in 5,000; and that all of the requirements of Public Act 132 have been complied with.

CHRISTOPHER S. LAMUS, P.S. 41914



Parcels A & B
TEXTILE / BUNTON ROAD
Washtenaw County, Michigan



NOVA CONSULTANTS, INC.
PROFESSIONAL SURVEYING AND GEOTECHNICAL SERVICES

Date: August 14, 2000
Drawn by: FZ

Sheet: 2 of 2
Approved by: [Signature]