

**PHASE I ENVIRONMENTAL SITE ASSESSMENT
PARKING LOT 8
6241 AMSTERDAM AND 406 CASS
DETROIT, MICHIGAN 48202**

PREPARED FOR:

GMAC AND/OR GMAC BANK

ENCORE ENVIRONMENTAL CONSORTIUM, LLC

DATE: MAY 15, 2009

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(Signature)

Brad Saunders

(Type Name)

Project Manager

(Title)

ENCORE

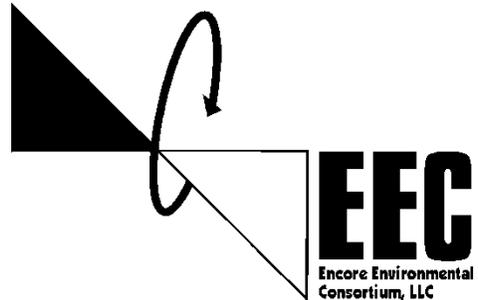


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1.0 INTRODUCTION

A Phase I Environmental Site Assessment (ESA) has been performed of Parking Lot 8 located at 6241 Amsterdam and 406 Cass in Detroit, Michigan 48202 (herein referred to as “the Site”; see Figure 1 and Figures 2A and 2B in Appendix A).

The purpose of this Phase I ESA was to identify and document the current and historical environmental conditions of the Site and the presence of substances which indicate an existing, past, or potential adverse environmental impact to the air, soil, groundwater or surface waters as a result of operations on the Site and adjacent and surrounding properties, and which indicate that further investigation may be necessary to evaluate potential environmental liabilities associated with the Site. The investigation was also intended to identify Recognized Environmental Conditions (RECs) as defined by the American Society for Testing and Materials (ASTM) E 1527-00.

The ASTM standard defines a REC as *“the presence or likely presence of any hazardous substances or petroleum products on a property (Site) under conditions that indicate an existing release, a past release, or a material threat of a release of any hazardous substances or petroleum products into structures on a property or into the ground, groundwater, or surface water of the property. The term includes hazardous substances or petroleum products even under conditions in compliance with laws. The term is not intended to include de minimis conditions that generally do not present a material risk of harm to public health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies. Conditions determined to be de minimis are not recognized environmental conditions.”*

The conclusions regarding the potential impact of RECs on the Site are intended to help the client and other users of the report evaluate the “business environmental risk” associated with the Site, as defined in the ASTM E 1527-00 Standard. The ASTM Standard defines “business environmental risk” as *“a risk which can have a material environmental or environmentally-driven financial impact on the business associated with the current or planned use of a parcel of commercial real estate.”*

1.1 SCOPE OF WORK

The following scope of work was undertaken, in accordance with ASTM Phase I ESA Standard requirements and client-specified requirements:

Task 1

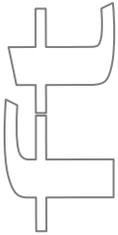
A Site reconnaissance was conducted to visually and physically observe the Site in an effort to obtain information suggesting Recognized Environmental Conditions of potential concern, including:

- Observing and recording the physical setting of the Site.
- Observing and documenting the property and land use, including abutting and surrounding properties.
- Interviewing the current property owner/tenants/maintenance chief to obtain information on current and past operations that may have led to a release of oil, gasoline, solvents, or hazardous material(s) to the soil or ground water and information regarding the presence of underground storage tanks (USTs), hydraulic lifts, asbestos, lead-based paint, polychlorinated biphenyls (PCBs), etc. on site.
- Observing and documenting the Site conditions that may be indicative of past and present releases and practices, including taking color photographs showing the general property and surrounding areas.

- Observing and documenting the presence and/or absence and the condition and apparent regulatory compliance status of prior and current aboveground storage tanks (ASTs), USTs, chemical storage areas, hydraulic lifts, septic fields, drainage systems, oil/water separators, central vehicle fluid (i.e., oil, grease, transmission fluid, etc.) dispensing systems, etc., including taking color photographs showing the location and condition of these observed areas.
- Observing and recording the presence or absence of chemical substances and/or debris on site, including the number of drums/containers, size, estimated quantity, and a description/identification of the contents where possible.

Task 2

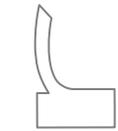
A Site history review was performed to evaluate previous ownership and land use including:



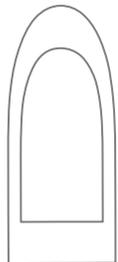
- Local geology/hydrogeology;
- Groundwater well inventory;
- Groundwater use;
- Interviews with local officials from the fire marshal's office, town or city engineer's and assessor's office, etc.;
- Review of information from town or city historical societies, libraries, etc.; and
- Review of historic aerial photographs, Sanborn or other fire insurance maps, etc.

Task 3

An electronic database search report was generated for the Site by Environmental Data Resources, Inc. (EDR) to complete the environmental records review. The database search was used to identify properties that may be listed in the referenced Agency records, located within the ASTM-specified search radii indicated below. The databases reviewed included, but were not limited to:



<u>Database</u>	<u>Search Radius</u>
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A summary of information is provided for each of the above-listed databases in Section 2 of this report. The complete environmental database report is provided in Appendix D.

The database search was supplemented with inquiries with appropriate regulatory agencies and municipalities regarding the Site, and to the extent practicable, adjacent properties. Inquiries were made with regulatory agencies with regard to basic regulatory compliance issues for the subject property, such as Site drainage, permits, etc.

Task 4

A preliminary asbestos, PCB, lead-based paint, and radon review was performed based on: observations of the Site reconnaissance and property location, the age(s) of the buildings, building materials, discussions with the owner/tenant/operator and the local utility company, and the results of the database search discussed in Task 3.

Task 5 The findings of the ESA have been documented in this report, which presents a professional opinion as to the environmental disposition of the Site with regard to the presence of Recognized Environmental Conditions or other or other environmental issues.

1.2 EXCEPTIONS AND DEVIATIONS

1.2.1 Exceptions

No exceptions to ASTM E1527-00 were taken during this Phase I ESA.

1.2.2 Deviations

Deviations from the ASTM Standard 1527-00 included the addition of several client-specified, non-ASTM considerations.

- Preliminary review of potential for radon gas presence and accumulation;
- Preliminary Asbestos-Containing Material (ACM) evaluation;
- Preliminary lead-based paint presence evaluation;
- Preliminary Wetlands Identification; and
- Preliminary observations regarding potential environmental regulatory compliance issues.

Evaluation of the Site for these criteria was performed for the purpose of providing a general indication of potential problems; this assessment does not serve as a substitute for radon/ACM/lead paint testing, wetlands delineation or a regulatory compliance audit.

2.0 ASSESSMENT FINDINGS

Information obtained from the sources and activities described in Section 1.0 are presented in the following section. Information supporting the observations in this report is provided in the Appendices. The Site Location, Site Map, and Surrounding Properties Map are provided in Appendix A. A list of contacts used to prepare this Phase I ESA report is provided in Appendix B. Appendix B also includes environmental correspondence records from telephone interviews and/or visits and resultant data collected. Photographic documentation is provided in Appendix C. The environmental database report is provided in Appendix D. Historical information is provided in Appendix E. Previous reports are referenced in Appendix F. Resumes of the EEC personnel who prepared this Phase I ESA are provided in Appendix G.

2.1 SITE RECONNAISSANCE



On May 8, 2009, EEC completed the Site reconnaissance. The Site reconnaissance included an inspection of the Site and its structures, review of relevant Site records made available to EEC, visual observations of adjacent properties as viewed from the Site and surrounding roadways, and interviews with individuals associated with the Site. EEC was accompanied during the Site reconnaissance by a Site representative. Site personnel provided information regarding facility operations and historical Site uses.

2.1.1 Site Location and Description



The Site is currently a vacant paved parking lot. The Site is zoned SD2, Special Use. The Site consists of one 1.4 acre parcel of land. According to historical references, the Detroit Motor Company, a lead smelting building, and two fire department structures existed on the Site as early as 1897. The Cadillac Motor Car Company replaced the Detroit Motor Company building prior to 1910. The Cadillac Motor Car Company building encompassed the Site, except for the fire department structures. The Cadillac Motor Car Company was present until sometime before 1941 when the entire building was removed along with the fire department structures. A used car sales building was present on the southern portion of the Site from prior to 1941 until prior to 1951, when it was replaced with a different automobile sales and service building in the same vicinity. This structure was present until prior to 1961, when it was removed from the Site. A second structure was present on the northeastern portion of the Site from before 1941 until before 1977, when it was removed. From prior to 1977 until present, the Site has been vacant and used as a surface parking lot.



The general area consists of commercial areas. The Site is accessed from the west via two entrances from Cass Avenue, and from the south via one entrance from Amsterdam. Refer to Figures 1-3 in Appendix A for additional Site features and information. Photographs of the Site are included in Appendix C.

2.1.2 Adjacent Properties

An automobile tour of adjacent properties was conducted to identify any RECs that may adversely affect the Site. The tour was conducted from public rights-of-way and did not involve entry onto any of the adjacent properties. The adjacent properties are shown on the attached Figure 3 in Appendix A.

Grand Trunk Western Railroad exists immediately north, northeast, and northwest of the Site. A parking structure, West Baltimore Street, and commercial land use exist further north and northwest of the Site, beyond Grand Trunk Western Railroad. To the northeast of the Site, beyond Grand Trunk Western Railroad, exists a surface parking lot, West Baltimore Street, and a commercial building. Cass Avenue

exists immediately east of the Site, beyond which exists a surface parking lot. The intersection of Cass Avenue and Amsterdam Street exists southeast of the Site, beyond which exists Dalgleish Cadillac. Amsterdam Street exists immediately south and southwest of the Site, beyond which exists Thompson Elementary School. An alley exists immediately west of the Site, beyond which exists the Westcott Building, which houses offices.

No RECs or other environmental issues were noted in association with the adjacent properties.

2.1.3 Underground Storage Tanks

According to Site personnel and the Environmental Data Resources (EDR) report, there are no underground storage tanks (USTs) currently present at the Site and no USTs were known to have historically existed at the Site. Evidence of former USTs observed by EEC during the Site reconnaissance included patches in the asphalt pavement in various locations across the Site. According to previous reports, up to nine USTs may have been installed at the Site. In June 2004, an electromagnetic (EM) survey was conducted across the Site in an attempt to identify existing USTs or piping. Three areas (southern portion, southwestern portion, and western portion) on the Site were identified in the survey that potentially contained USTs. In March 2007, three test pits were excavated in these areas to a depth of approximately six feet below ground level (bgl). A pipe was discovered in the southwestern test pit, and the test pit excavation was extended to trace the pipe to its ends. The type of pipe was not able to be determined.

Soil samples were collected from each of the test pits and submitted to a laboratory to be analyzed for volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), polychlorinated biphenyls (PCBs), and priority pollutant metals list. VOCs, SVOCs, and PCBs were not detected in the soil samples from the test pits. The test pits in the southern and western portions of the Site (TP-1 and TP-3, respectively) contained concentrations of metals below the applicable criteria. The test pit in the southwestern portion of the Site (TP-2) contained arsenic and lead at concentrations greater than the Michigan Department of Environmental Quality (MDEQ) Generic Residential Direct Contact (GRDC) Cleanup Criterion. Based on these results, it was determined that the Site would be classified as a “facility” as defined by Section 20107a of Part 201 of the Natural Resources and Environmental Protection Act (NREPA), 1994 PA 451, as amended (Part 201). In August 2007 three soil borings were installed surrounding TP-2 to delineate the identified arsenic and lead impacts. Laboratory results from the soil samples indicated that the horizontal and vertical extent of arsenic and lead impacts were defined. The applicable land use scenario for the Site is Commercial IV, and the concentrations of arsenic and lead detected in TP-2 are below the levels deemed safe for the Commercial IV land use scenario. The concentrations of arsenic and lead greater than the MDEQ – GRDC Cleanup Criteria but less than the Commercial IV Criteria are considered an other environmental issue.

No RECs were noted in association with USTs at the Site.

2.1.4 Aboveground Storage Tanks

According to Site personnel, no aboveground storage tanks (ASTs) are currently present at the Site. No ASTs were observed by EEC during the Site reconnaissance and no records of ASTs were listed at the Site in the EDR report. ASTs previously existed at the Site during the Cadillac Motor Company operations. According to historical references two 25,000-gallon tanks were present on the eastern portion of the Site, apparently located on the roof of the building over an elevator and stairwell. ASTs located in other sections of the building west of the Site are labeled as being a water tank, and the

historical reference indicates that the building contained automatic sprinklers. Therefore, EEC concludes that the 25,000-gallon ASTs located on the eastern portion of the Site likely contained water.

No RECs or other environmental issues were noted in association with ASTs at the Site.

2.1.5 Hydraulic Equipment and Elevators

According to Site personnel, no hydraulic lifts currently exist or historically existed at the Site, and EEC did not observe evidence of hydraulic lifts or elevators during the Site reconnaissance. According to historical documentation, three elevators were present on the Site during the Cadillac Motor Car Company operation. Given the timeframe of construction (approximately 1910) it is likely that the elevators were electrically operated with motor control rooms located on the roof of the former building. No other elevators were identified to have existed on the Site.

No RECs or other environmental issues were noted in association with hydraulic lifts or elevators at the Site.

2.1.6 Site Drainage and Discharge

At the time of the Site reconnaissance, EEC observed five storm water drains located in the asphalt parking lot areas across the Site. According to Site personnel, the storm drains discharge to the City of Detroit storm sewer system.

According to Site personnel, no wastewater-generating activities currently are performed at the Site, and EEC did not observe evidence of wastewater-generating activities at the Site. According to historical references and previous reports, various commercial and industrial operations have occurred at the Site. According to previous reports sanitary sewer systems were present in the vicinity of the Site since the late 1800's. Therefore, it is likely that wastewater generated during previous Site operations discharged to the sanitary sewer system.

No RECs or other environmental issues were noted in association with site drainage and discharge.

2.1.7 Other Hazardous Substances and Petroleum Products

According to Site personnel, no petroleum or hazardous substances currently are stored or used at the Site, and EEC did not observe any evidence of petroleum or hazardous substances stored or used at the Site. According to historical references and previous reports, the previous historical manufacturing and automobile service operations at the Site used petroleum and hazardous substances including oils, varnishes, and solvents. In addition, two railroad spurs were located along the northern portion of the Site, in the vicinity of the current elevated railroad tracks.

According to previous reports, a Phase II ESA was conducted in March 2007 to assess the potential for impacts to the Site from former operations. Soil borings were completed in the vicinity of former storage areas, manufacturing operations, and near the railroad spur locations. Groundwater was not encountered to a depth of 14 feet below ground level (bgl). Soil samples were collected from the soil borings and submitted to a laboratory to be analyzed for VOCs, SVOCs, PCBs, and priority pollutant metals list. Two samples contained concentrations of benzo(a)pyrene (BAP) at concentrations greater than the MDEQ - GRDC Cleanup Criterion. Other polynuclear aromatic hydrocarbons (PAHs) were detected at concentrations below the MDEQ-GRDC. Based on these results, it was determined that the Site would be

classified as a “facility” as defined by Section 20107a of Part 201. Results for VOCs and the remaining SVOCs were non-detect, and the metals results were either non-detect or were detected below background concentrations. An additional subsurface investigation was conducted in August 2007 to delineate the identified soil impacts. Concentrations of BAP were identified in the western portion of the Site above the MDEQ Generic Commercial IV Direct Contact (GCDC) Cleanup Criterion; however, the two areas of BAP impacts were delineated. The Commercial IV land use scenario is the appropriate designation for the current use of the Site as a parking lot. The presence of soil impacts at concentrations above the MDEQ land use scenario generic criteria requires the Site to remediate the impacts or impose a land use restriction on the deed that eliminates the potential for contact with the impacted soil. There is no record of the impacts having been remediated or of a land use restriction having been placed on the deed controlling operations in the impacted area. Based on the lack of documentation of remediation or land use restriction in the vicinity of the BAP impacts, the concentrations of BAP in soil exceeding the MDEQ-GRDC Criterion represents a REC. In addition, residual concentrations of PAHs in the soil on the Site represent an other environmental issue.

During the Phase II ESA and delineation subsurface investigation the following identified areas of concern were not investigated: the former lead smelting building (Detroit Motor Company); the former varnishing/finishing area and former oil storage room (Cadillac Motor Car Company); and a former unknown structure in the northeastern portion of the Site. Furthermore, only one soil boring was completed in the vicinity of the former ground-level railroad spurs, which spanned approximately 150 feet within the northern border Site. The former lead smelting building, former varnishing/finishing area and former oil storage room, former unknown structure in the northeastern portion of the Site, and former ground-level railroad spurs spanning the northern border of the Site represent RECs..

2.1.8 Suspect Asbestos-Containing Building Materials

An asbestos survey was not conducted as part of this Phase I ESA. No structures or discarded building materials containing suspect asbestos containing materials (ACM) were observed by EEC during the Site reconnaissance. Historical references indicate the Site has been developed land from as early as 1897 until prior to 1977. Therefore, asbestos containing materials may have been present at the Site; however no structures are present on the Site. No other environmental issues were noted in association with asbestos-containing materials.

2.1.9 Lead-Based Paint

A lead-based paint survey was not conducted as part of this Phase I ESA. No painted building structures or discarded painted materials containing suspect lead-based paint were observed by EEC during the Site reconnaissance. Historical references indicate the Site has been developed land from as early as 1897 until prior to 1977. Therefore, lead-based paint may have been present at the Site while developed; however no buildings are present on the Site. No other environmental issues were noted in association with lead-based paint.

2.1.10 Polychlorinated Biphenyls

Site personnel did not have knowledge of PCB-containing materials formerly or currently present at the Site. The Site is currently vacant land; therefore, electricity is currently not supplied to the Site.

No RECs or other environmental issues were noted in association with potential PCB-containing materials at the Site.

2.1.11 Radon Gas

Information regarding radon concentrations in the Site vicinity was obtained by EDR. Details regarding this information are presented in the Geocheck® Addendum to the EDR Radius Map Report, which is attached as Appendix D.

Wayne County is located within Radon Zone 3, where indoor radon levels are less than 2 picocuries per liter (pCi/L). This information was derived from the USEPA Radon Map, which is based on indoor radon screening samples compiled by the EPA, geologic and soil analysis, and the foundations types typically found within each zone. The Michigan State Database for zip code 48202 reported an average radon activity of 0.6 pCi/L from 1 sites tested. The Federal Area Radon Information for the 48202 zip code reported an average radon activity of 0.9 pCi/L in basement areas. No radon data was reported for first floor or second floor living areas. No basement areas exist at the Site. According to Site personnel, no radon testing has been conducted at the Site. These concentrations compare favorably to the EPA safety standard for radon gas in residences of 4 pCi/L and the United States Council on Radiation Protection and Measurement (NCRP) standard of 8 pCi/L. In consideration of typical Wayne County radon levels and area property radon data for basement areas, radon is not considered an other environmental issue at the Site.

2.1.12 Wetlands Identification

A wetland survey or delineation was not conducted for this Phase I ESA. EEC contracted EDR to conduct a records search of the U.S. Fish and Wildlife Service National Wetlands Inventory (NWI) for the Site and surrounding area. The EDR report indicated that NWI electronic data coverage was not available for the Site and surrounding properties. State wetland coverage was not available for the Site. Federal Emergency Management Agency (FEMA) flood plain panel data was available for the Site and surrounding area, which indicated that the Site is not located within a 100-year or 500-year flood zone. No Federal 100-year or 500-year flood zone areas are depicted within 1 mile of the Site. The nearest mapped surface water is a pond which is located 1 mile southwest of the Site.

During the Site reconnaissance, EEC personnel did not observe wetland-type vegetation (i.e., cattails and grasses) on the Site. The EDR report does not identify the Site as being located within a Federal or state wetland. Therefore, based on the information obtained from EDR and the Site reconnaissance, the Site does not appear to contain wetlands.

2.1.13 Solid and Special Waste

The Site contact did not have knowledge of former or current solid waste generation activities at the Site. EEC did not observe activities which would generate solid waste or special waste at the time of the Site reconnaissance; however EEC did observe one small dumpster that contained general refuse in the northeastern portion of the Site. No staining or stressed vegetation was observed at the Site.

No RECs or other environmental issues were noted in association with solid or special waste.

2.1.14 Hazardous Waste

Hazardous waste is not generated on the Site, as the Site is currently used as a parking lot. The EDR report did not identify occupants or hazardous waste listings for the Site. No evidence of on-site

hazardous waste disposal was observed by EEC during the Site reconnaissance. In addition, a review of historical documents indicated no evidence of on-site disposal activities.

No RECs or other environmental issues were noted in association with hazardous waste generation, handling, or disposal.

2.1.15 Air Emissions

According to Site personnel, there is currently no operable equipment at the Site that requires air emissions permitting or testing. During the Site reconnaissance, EEC did not observe or detect such operable air emission sources.

No RECs or other environmental issues were noted in association with air emissions.

2.1.16 Spills/Releases

No Site releases were identified in the EDR regulatory database search. According to Site personnel, there were no documented releases or spills at the Site to the environment. No evidence of spills or releases was observed by EEC at the Site during the Site reconnaissance. However, according to previous reports, concentrations of benzo(a)pyrene and lead were detected in soil above the MDEQ generic residential cleanup criteria. Details regarding RECs and other environmental issues associated with the soil impacts are presented in Sections 2.1.3 and 2.1.7.

2.1.17 CERCLA Liability Potential

The Site is not listed on the NPL or in the State Hazardous Waste Site Database. There is no documentation that the Site has received notification from any government agency or third party of liability as a potential responsible party for any hazardous waste treatment, storage, or disposal on site. There is no documentation that the Site has defended any environmental-related claims or litigation asserted by any governmental agency or third party, and no potential claims or litigation presently exist.

2.2 SITE HISTORY REVIEW

2.2.1 Property Usage

City Directories

EEC contracted EDR to perform a City Directory search of the Site and the surrounding addresses. EDR reviewed local sources including Polk's City Directory and Bresser's Criss-Cross Directory. Area listings for the Site and surrounding properties were available from EDR for the years 1941 to 2009, and are presented below.

City Directory Site Listings

YEAR	ADDRESS	LISTING
1941, 1956, 1964, 1968, 1973, 1979, 1984, 1989, 1994, 1999, 2004, and 2009	Not Listed	No Listings

City Directory Surrounding Properties Listings

YEAR	ADDRESS	LISTING
1941	6110 Cass Avenue	American Electrical Heater Company
	6111 Cass Avenue	Jerry McCarthy Chevrolet
	6160 Cass Avenue	Buick Motor Division GM Sales Corp.
	6164 Cass Avenue	Buick Motor Division GM Sales Corp.
	6200 Cass Avenue	Harvey Mack Pontiac
	6225 Cass Avenue	Park Rite Co.
	6300 Cass Avenue	Germain Co.
1956	6110 Cass Avenue	American Electrical Heater Company
	6143 Cass Avenue	Associated Refrigerator Serv.
	6164 Cass Avenue	Buick Retail Sales Store
	6225 Cass Avenue	Park Rite Co.
	6300 Cass Avenue	Germain Co.
1964	6110 Cass Avenue	American Electrical Heater Company
	6164 Cass Avenue	Vacant
	6265 Cass Avenue	Argonaut Div. GMC (parking lot)
1968	6110 Cass Avenue	American Electrical Heater Company
	6160 Cass Avenue	C. Dalgleish Cadillac (new car sales)
	6164 Cass Avenue	C. Dalgleish Cadillac (parking lot)
	6265 Cass Avenue	Argonaut Div. GMC (parking lot)
1973	6110 Cass Avenue	American Electrical Heater Company
	6160 Cass Avenue	C. Dalgleish Cadillac (new car sales)
	6265 Cass Avenue	Argonaut Div. GMC (parking lot)
1979	6110 Cass Avenue	American Electrical Heater Company American Beauty Electric
	6160 Cass Avenue	C. Dalgleish Cadillac
1984	6110 Cass Avenue	American Electrical Heater Company AB Soldering Irons
	6160 Cass Avenue	Dalgleish Cadillac, Inc
1989	6110 Cass Avenue	American Electrical Heater Company American Beauty Soldering Irons
	6160 Cass Avenue	Dalgleish Cadillac, Inc
1994	6110 Cass Avenue	American Electrical Heater Company
	6160 Cass Avenue	Dalgleish Cadillac, Inc
1999	6160 Cass Avenue	Dalgleish Cadillac, Inc
2004	6160 Cass Avenue	Dalgleish Cadillac-Peugeot
2009	6160 Cass Avenue	Dalgleish Cadillac Oldsmobile



The EDR City Directory report with the Site and adjacent street address listings is included in Appendix E. No RECs or other environmental issues were noted in association with the City Directory search.

Sanborn® Fire Insurance Maps

Sanborn® Fire Insurance Maps assist in the identification of historic land use and commonly indicate the existence and location of aboveground and underground storage tanks, structures, improvements and facility operations. Sanborn® Fire Insurance Maps for the Site and adjoining areas from 1897, 1910, 1941, 1951, 1953, 1957, 1961, 1977, 1989, 1991, 1996, and 2002 were reviewed by EEC. Sanborn® Fire

Insurance Maps are included in Appendix E. The following is a summary of EEC's interpretation of features observed on the Sanborn® Fire Insurance Maps



Map Year	EEC Interpretation
1897	<p>The 1897 Sanborn® Map depicts the Fire Engine Company No. 17 located on the southern portion of the Site. The Fire Department consists of two buildings, the main fire hall and a storage building for shavings and wagons. In addition, the Detroit Motor Company is depicted along the northern portion of the Site. A railroad spurs is shown along the north side of the Detroit Motor Company building. The operation was comprised of an electrical department, offices, and a machining area on the Site. Depicted just south of the Detroit Motor Company is a small structure shown as being used for lead smelting. This was likely associated with the Detroit Motor Company operation. Two railroad lines are depicted north and northeast of the Site, beyond which existed commercial buildings, another railroad, and residences. Vacant and undeveloped land existed east of the Site across Cass Avenue. The intersection of Cass and Amsterdam is depicted southeast of the Site, beyond which existed the Citizens Street Railway Car Barns and vacant land. Amsterdam Street is depicted south and southwest of the Site, beyond which existed vacant land. Vacant and undeveloped land existed west of the Site, except for a portion of the Detroit Motor Company building and a small structure.</p>
1910	<p>The 1910 Sanborn® Map depicts the Fire Engine Company No. 17 still located on the southern portion of the Site. The Detroit Motor Company is no longer depicted along the northern portion of the Site. The Cadillac Motor Car Company encompasses the majority of the Site. Operations include wood working, a wash room testing room, oil storage, offices, and varnishing and finishing areas. Three elevators are depicted between the offices and manufacturing areas. A second railroad spur is shown along the northern portion of the Site. A warehouse for the Cadillac Motor Car Company is depicted east of the Site across Cass Avenue and across the intersection of Cass and Amsterdam southeast of the Site. Commercial and manufacturing structures depicted south and southwest of the Site. A portion of the Cadillac Motor Car Company is depicted west of the Site. No additional significant discernible changes are depicted to the surrounding properties from the 1897 Sanborn® Map</p>
1941	<p>The 1941 Sanborn® Map depicts the Cadillac Motor Car Company has been removed from the Site, and is replaced by a small used auto sales building in the southern portion of the Site, and a small unknown structure located in the northeastern portion of the Site. A post office building is depicted north beyond the railroad lines, and a parking garage is depicted northeast of the Site beyond the railroad lines. The properties to the east across Cass Avenue and to the south across Amsterdam are shown as vacant except for a small used auto sales building on each property. The Buick Service Station building is depicted southeast of the Site, connected to a factory building to the south. Commercial structures are shown to the southwest and west of the Site.</p>
1951	<p>The 1951 Sanborn® Map depicts the Site primarily the same as in the 1941 Sanborn® Map, with the exception of the used auto sales building in the southern portion of the Site has been removed and replaced with an used auto sales and service building slightly north of the former building. No additional significant discernible changes are depicted to the Site and surrounding properties from the 1941 Sanborn® Map.</p>

Map Year	EEC Interpretation
1953	The 1953 Sanborn® Map depicts the Site and surrounding properties primarily the same as in the 1951 Sanborn® Map.
1957	The 1957 Sanborn® Map depicts the Site and surrounding properties primarily the same as in the 1953 Sanborn® Map.
1961	The 1961 Sanborn® Map depicts the used auto sales and service building as being removed from the Site. No significant discernable changes are depicted to the surrounding properties from the 1957 Sanborn® Map.
1977	The 1977 Sanborn® Map depicts the unknown building as being removed from the Site, and the Site is depicted as being used for parking. The post office building is no longer depicted to the north of the Site, and has been replaced by auto parking. No other significant discernable changes are depicted to the surrounding properties from the 1961 Sanborn® Map.
1989	The 1989 Sanborn® Map depicts the Site and surrounding properties primarily the same as in the 1977 Sanborn® Map.
1991	The 1991 Sanborn® Map depicts the Site and surrounding properties primarily the same as in the 1989 Sanborn® Map.
1996	The 1996 Sanborn® Map depicts the Site and surrounding properties primarily the same as in the 1991 Sanborn® Map.
2002	The 2002 Sanborn® Map depicts the Site and surrounding properties primarily the same as in the 1996 Sanborn® Map.

Details regarding RECs associated with the Site’s former manufacturing uses are provided in Sections 2.1.3 and 2.1.7. No other environmental issues were noted in association with review of Sanborn® Fire Insurance Maps.

Topographic Maps

Topographic maps assist in the identification of regional land and development features. Topographic maps were obtained from EDR. Topographic maps for the Site and adjoining areas from 1905, 1947, 1952, 1968, 1973 and 1980 were reviewed by EEC. Topographic maps are included in Appendix E. The following is a summary of EEC's interpretation of features observed on the topographic maps.

Map Year & Information	EEC Interpretation
1905 Detroit Quadrangle; Series = 15 Scale = 1 : 62,500	The 1905 topographic map depicts the Site at approximately 630 feet above mean sea level. The Site is depicted with two structures. Heavy development and residential properties associated with the City of Detroit is depicted in all directions of the Site. The Grand Trunk rail road is depicted north and northeast, of the Site. The Detroit River is depicted further south of the Site.
1947 Detroit Quadrangle; Series = 7.5 Scale = 1 : 24,000	The 1947 topographic map depicts the Site as vacant and undeveloped land. The buildings are no longer depicted on the Site. Less residential development is depicted north, southeast, and south of the Site. No additional significant discernible changes are depicted to the surrounding properties from the 1905 topographic map.
1952 Detroit Quadrangle; Series = 7.5 Scale = 1 : 24,000	The 1952 topographic map depicts the Site as heavily developed. Additional commercial development is depicted in all directions of the Site. No additional significant discernible changes are depicted to the surrounding properties from the 1947 topographic map.

Map Year & Information	EEC Interpretation
1968 Detroit Quadrangle; Series = 7.5 Scale = 1 : 24,000	The 1968 topographic map depicts the Site and surrounding properties as heavily developed, with few individual buildings depicted. No other significant discernible changes are depicted to the surrounding properties from the 1952 topographic map.
1973 Detroit Quadrangle; Series = 7.5 Scale = 1 : 24,000	The 1973 topographic map depicts no significant discernible changes to the Site or surrounding properties from the 1968 topographic map.
1980 Detroit Quadrangle; Series = 7.5 Scale = 1 : 24,000	The 1980 topographic map depicts no significant discernible changes to the Site or surrounding properties from the 1973 topographic map.

Details regarding RECs associated with the Site's former manufacturing uses are provided in Sections 2.1.3 and 2.1.7. No other environmental issues were noted in association with review of historic topographic maps.

Aerial Photographs

Aerial photographs assist in the identification of Site features and outdoor activities of potential environmental concern. Aerial photographs were obtained from EDR. Aerial photographs for the years 1937, 1949, 1957, 1962, 1972, 1985, 1993, 2000, and 2005 were reviewed by EEC and are included in Appendix E. The following is a summary of EEC's interpretation of features observed on the aerial photographs.

Map Year & Scale	EEC Interpretation
1937 Scale: 1"=500'	The 1937 aerial photograph depicts the Site as vacant. Commercial structures are depicted in all directions of the Site. The Grand Trunk rail road is depicted north and northeast of the Site.
1949 Scale: 1"=500'	The 1949 aerial photograph depicts a building in the southern portion and another structure in the northeastern portion of the Site. No significant discernible changes to surrounding properties are depicted from the 1937 aerial photograph.
1957 Scale: 1"=500'	The 1957 aerial photograph depicts no significant discernible changes to the Site or surrounding properties from the 1949 aerial photograph.
1962 Scale: 1"=500'	The 1962 aerial photograph depicts the Site as vacant. No significant discernible changes to the surrounding properties are depicted from the 1957 aerial photograph.
1972 Scale: 1"=600'	The 1972 aerial photograph depicts no significant discernible changes to the Site or surrounding properties from the 1962 aerial photograph.
1985 Scale: 1"=500'	The 1985 aerial photograph depicts no significant discernible changes to the Site or surrounding properties from the 1972 aerial photograph.
1993 Scale: 1"=600'	The 1993 aerial photograph depicts items stored on the western portion of the Site. No significant discernible changes to the surrounding properties are depicted from the 1985 aerial photograph.

Map Year & Scale	EEC Interpretation
2000 Scale: 1"=500'	The 2000 aerial photograph depicts the Site as vacant. No significant discernible changes to the surrounding properties are depicted from the 1993 aerial photograph.
2005 Scale: 1"=501'	The 2005 aerial photograph depicts no significant discernible changes to the Site or surrounding properties from the 2000 aerial photograph.

Details regarding a REC associated with the former structures in the northeastern portion of the Site are provided in Section 2.1.7. No other environmental issues were noted in association with review of the aerial photographs.

2.2.2 Regional Geology

Information regarding the regional and Site-specific geology in the Site vicinity was obtained from the GeoCheck Addendum to the EDR Radius Map Report and previous reports. The Site is located approximately 630 feet above mean sea level, and the area slopes gradually to the east-northeast.

EDR regional soil data was not available. Underlying the surface, shallow, and deeper soils are the bedrock deposits classified as Paleozoic Era, Devonian System, and Middle Devonian Series.

2.2.3 Regional Hydrogeology

Information regarding the regional hydrogeology of the Site vicinity was obtained from the Geocheck Addendum to the EDR Radius Map Report and a previous report. One AQUIFLOW® point was identified between 0.5 mile and 1 mile south-southeast of the Site. Groundwater flow direction was indicated as varied at the AQUIFLOW point; however, the average depth to groundwater at this well was 6.5 feet bgl. Previous reports indicate groundwater was not encountered to a depth of 14 feet bgl. Based on the area topography indicated in the EDR Report and nearby surface water bodies, the inferred localized groundwater flow direction is likely south-southwest. However, localized groundwater flow direction may vary based on several factors. A hydrogeologic investigation would be required to make a more definitive determination of the localized groundwater flow direction.

2.2.4 Previous Investigations

EEC reviewed the following previous investigative reports relevant to the Site.

- Enecotech Environmental Consultants (Enecotech), Phase I ESA, Part of Outlot 116, Northwest Corner of Amsterdam and Cass Avenues, Detroit, Wayne County, MI; October 22, 1996.
- In October of 1996, Enecotech conducted a Phase I ESA at the Site to identify and document the current condition of the property, and the presence of substances that indicate an existing, past, or potential adverse impact to the Site. The following is a summary of the findings of the report.
 - Previous Site uses included industrial use as part of automobile and motor manufacturing operations (lead smelting, varnishing/finishing areas, machine shop and electrical department) from at least 1897 through 1910. The 1910 Sanborn Fire Insurance Map identified numerous ASTs (up to 25,000-gallon capacity), that likely held paints, thinners or solvents.

- A soil pile (approximately 5 cubic yards) was observed on Site. The source of the soil was unknown.
- One CERCLIS-NFRAP facility was identified 0.25 miles northwest of the Site, in the anticipated upgradient direction. The facility was also listed as on the SQG, FINDS, RAATS, and TSCA databases. File information was unavailable at the time the report was written. The facility was considered a potential concern pending additional file review.
- One LUST facility was identified approximately 0.2 miles northwest of the Site, in the anticipated upgradient direction. File information was unavailable at the time the report was written. The facility was considered a potential concern pending additional file review.
- Several adjoining properties were identified by historical records as having previous industrial operations with the potential for releases. However, only Dalglish Cadillac was identified in the environmental database search report. Due to the nature of the land use in the area, past usage of the surrounding properties was listed as a potential concern.

- The Traverse Group, Inc. (TGI), Phase I ESA, Parking Lot 8, 6241 Cass Avenue, Detroit, MI 48202; January 31, 2005.

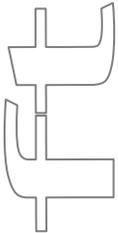
- In January of 2005, TGI conducted a Phase I ESA at the Site to identify and document the current condition of the property, and the presence of substances that indicate an existing, past, or potential adverse impact to the Site. The following is a summary of the findings of the report.

- The Site was formerly developed as part of a large industrial parcel occupied by the Detroit Motor Company and the Fire Engine Company Number 17 since at least 1897. The presence of operations included lead smelting, varnishing/finishing areas, machine shop and electrical department since at least 1897 represented a REC.
- The possible presence of two 25,000-gallon tank with unknown contents, up to nine USTs, a history of heating oil usage, and the presence of an oil house on Site represent RECs due to the unknown environmental status of the tanks.
- The 1910 Sanborn Map depicts railroad tracks on the northern side of the former Site Building. It was stated that railroad ties are known to contain oily substances (creosols), and that the railroad could have been used to transport raw materials and fuel loading or unloading activities could have occurred, which represented a REC.
- Two areas of suspect buried USTs were identified during an electromagnetic survey of the Site. These locations corresponded with asphalt patches and suspect UST locations associated with the former firehouse and Cadillac Car Company Test Room area. The test was deemed inconclusive.
- Auto Manufacturing, a foundry, a UST, at least two 25,000-gallon tanks and a railroad spur were historically been located on the west adjoining property. The unknown status of the tanks and the industrial history represented a REC.

- The Traverse Group, Inc. (TGI), Phase I ESA Update, Parking Lot 8, 6241 Cass Avenue, Detroit, MI 48202; December 22, 2006.

- In December of 2006, TGI conducted a Phase I ESA Update at the Site to identify and document the current condition of the property, and the presence of substances that indicate an existing, past, or potential adverse impact to the Site. The findings of the report were the same as from the original Phase I ESA conducted in January 2005.
- The Traverse Group, Inc. (TGI), Phase II ESA, General Motors Parking Lot 8, 6241 Cass Avenue, Detroit, Wayne County, MI 48202; March 16, 2007.

- In March of 2007, TGI conducted a Phase II ESA at the Site to investigate the RECs identified in the Phase I ESA Update, and to evaluate if areas of the Site constituted a “facility,” as that term is defined under Part 201 of the Natural Resources and Environmental Protection Act (NREPA), 1994 PA 451, as amended (Part 201). The following is a summary of the findings and conclusions of the report.



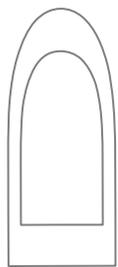
- Three test pits were excavated at the Site in the areas of geophysical anomalies previously identified in June 2004. Two of the test pits were excavated in a “plus-sign shape”, with the third test pit excavated in an east-west orientation. During the test pitting, TTG encountered concrete and brick debris. In one of the test pits a metal pipe was discovered, and the excavation was extended to find the ends of the pipe. TGI was able to uncover the pipe, but could not determine the type of pipe it was (i.e., electrical conduit, water pipe, etc.).



- Five soil borings (GP-1 through GP-5) were advanced to address various RECs using a Geoprobe rig. The borings were advanced to depths ranging from 5 to 15 feet bgl. Groundwater was not encountered in the borings. Each boring contained brown to gray fill materials from beneath the pavement to a depth of approximately four feet bgl, underlain by brown and gray clay with trace gravel to the terminus of the boring. Elevated PID readings were encountered only in GP-1 (11.3 parts-per-million (ppm) at nine feet bgl).



- A total of eleven (11) soil samples were collected for laboratory analysis: one from each soil boring; a duplicate sample from GP-1; three from Test Pit #1; and two from Test Pit #2. Soil samples were analyzed for VOCs, SVOCs, polychlorinated biphenyls (PCBs), and priority pollutant metals. Benzo(a)pyrene was detected in two samples (GP-3 at 2,600 ug/kg and GP-5 at 2,400 ug/kg) at concentrations above the Michigan Department of Environmental Quality (MDEQ) Generic Residential Direct Contact (GRDC) Criterion. Lead was detected in Test Pit #2 at 517,000 ug/kg, which is greater than the MDEQ GRDC Criterion for lead. All other results were less than the applicable MDEQ criteria or were non-detect.



- TGI concluded that based on the results, the Site would be classified as a “facility” as defined by Section 20107a of Part 201.

- The Traverse Group, Inc. (TGI), Debris Disposal and Parking Lot Restoration, Parking Lot 8, 6241 Cass Avenue, Detroit, MI 48202; July 25, 2007.

- In July of 2007, TGI oversaw the surface restoration of the test pit areas on the Site and the loading, transportation and disposal of excess debris and soils generated by the test pitting activities conducted in March 2007. TGI collected a composite sample of the excess debris and soil for characterization; the results of which indicated that the material was not hazardous by characteristic. Approximately 41 tons were disposed at Waste Management’s Sauk Hills Landfill. The test pit areas were repaved by placing approximately six-inches of crushed limestone in each of the test pits, compacted to within four inches of the surrounding surface. Asphalt was then placed on the limestone base and finished to grade.

- The Traverse Group, Inc. (TGI), Draft Lot 8 Delineation – Summary of Findings, General Motors Parking Lot 8, 6241 Cass Avenue, Detroit, Wayne County, MI 48202; August 27, 2007.
 - In August of 2007, TGI conducted a subsequent site investigation in an attempt to determine the horizontal and vertical extents of the impacts identified in the Phase II ESA conducted in March 2007, and to evaluate if areas of the Site constituted a “facility,” as that term is defined under Part 201 of the Natural Resources and Environmental Protection Act (NREPA), 1994 PA 451, as amended (Part 201). The following is a summary of the findings and conclusions of the report.
 - Eleven soil borings (DB-1 through DB-11) were advanced to address various RECs using a Geoprobe rig. The borings were advanced to depths ranging from 5 to 12 feet bgl. Groundwater was not encountered in the borings. Each boring contained brown to gray fill materials from beneath the pavement to a depth of approximately four feet bgl, underlain by brown and gray clay with trace gravel to the terminus of the boring. Elevated PID readings were encountered only in GP-1 (11.3 parts-per-million (ppm) at nine feet bgl).
 - A total of twenty (20) soil samples were collected for laboratory analysis. The soil samples that were collected from the DB-1 through DB-8 soil boring locations were submitted for laboratory analysis of PNAs by United States Environmental Protection Agency (USEPA) Method 8270. The soil samples that were collected from the DB-9 through DB-11 soil boring locations were analyzed for lead and arsenic by USEPA Method 6020. Benzo(a)pyrene was detected in two samples (DB-2 (2-4’) at 6,580 ug/kg and DB-3 (2-4’) at 12,400 ug/kg) at concentrations above the MDEQ GRDC Criterion. All other results were less than the applicable MDEQ criteria or were non-detect.
 - TGI concluded that based on the results, the horizontal and vertical extents of the lead and benzo(a)pyrene impacts at the Site had been defined. TGI estimated approximately 150 cubic yards of soil contaminated with lead and arsenic was present on the southern portion of the subject property. Additionally, approximately 150 cubic yards of soil contaminated with benzo(a)pyrene was present on the northeastern portion of the subject property.
- The Traverse Group, Inc. (TGI), Draft Due Care Plan, Section 7a Compliance Analysis, General Motors Parking Lot 8, 6241 Cass Avenue, Detroit, Wayne County, MI 48202; October 3, 2007.
 - In October of 2007, TGI prepared a draft Due Care Plan to meet the obligations of an owner/operator of a “facility” as defined in Section 20107a of Part 201 and to provide information about the known environmental concerns, distribution and concentrations of contaminants, as well as appropriate response activities at the Site. The following is a summary of the findings and conclusions of the report.
 - The planned current and future use of the Site was described as remaining as a paved, automobile parking lot. As such, the applicable land use scenario was described as being Commercial IV.
 - The primary potential exposure route was identified as direct dermal contact with the impacted soil during earth-moving, construction, or utility work activities.
 - The area identified as containing concentrations of benzo(a)pyrene above the MDEQ Generic Commercial IV Criterion included soil borings DB-1 through DB-4, and included GP-3 and Test Pit #3. All other potential exposure pathways were either incomplete or did not contain concentrations of chemicals greater than the MDEQ Generic Commercial IV Criteria.

The previous reports are referenced in Section 6.0 and Appendix F.

2.3 FEDERAL, STATE, AND LOCAL AGENCY FILE REVIEW

2.3.1 Environmental Database Search

EEC contracted Environmental Data Resources, Inc. (EDR) to conduct a search of federal and state environmental databases. Based on the Site address, the database searches were completed to assist in the identification of conditions at the Site. The complete EDR Radius Map Report is attached as Appendix D. The following is a list of databases reviewed and respective search distances from the center of the Site:

FEDERAL DATABASES



- National Priority List (NPL) – 1 mile
- Proposed NPL – 1 mile
- Delisted NPL Sites – 1 mile
- NPL Liens – Target Property
- Comprehensive Environmental Response, Compensation, and Liability Act Information System (CERCLIS) – 0.5 mile
- CERCLIS – No Further Remedial Action Planned (CERC-NFRAP) – 0.5 mile
- CERCLA Lien Information (LIENS 2) – Target Property
- Corrective Action Reports (CORRACTS) – 1 mile
- Resource Conservation and Recovery Information System permitted treatment, storage, and disposal facilities (RCRA-TSDF) – 0.5 mile
- RCRA small/large quantity generators of hazardous waste (RCRA-SQG/RCRA-LQG) – 0.25 mile
- RCRA conditionally exempt small quantity generator of hazardous waste (RCRA-CESQG) – 0.25 mile
- RCRA non-generator of hazardous waste (RCRA-NonGen) – Target property
- Engineering Controls Site Listing (US ENG CONTROLS) – 0.5 mile
- Institutional Controls Site Listing (US INST CONTROL) – 0.5 mile
- Emergency Response Notification System (ERNS) – Target property
- Hazardous Materials Information Reporting System (HMIRS) – Target Property
- DOT Office of Pipeline Safety Incident and Accident Data (DOT OPS) – Target Property
- Clandestine Drug Labs (US CDL) – Target Property
- Brownfields Sites (US BROWNFIELDS) – 0.5 mile
- Department of Defense Sites (DOD) – 1 mile
- Formerly Used Defense Sites (FUDS) – 1 mile
- Land Use Control Information System (LUCIS) – 0.5 mile
- Superfund (CERCLA) Consent Decrees (CONSENT) – 1 mile
- Records of Decision (ROD) – 1 mile
- Uranium Mill Tailings Sites (UMTRA) – 0.5 mile
- Open Dump Inventory (ODI) – 0.5 mile
- Torres Martinez Reservation Illegal Dump Site Locations (DEBRIS REGION 9) – 0.5 mile
- Mines Master Index File (MINES) – 0.25 mile
- Toxic Chemical Release Inventory System (TRIS) – Target Property
- Toxic Substances Control Act (TSCA) – Target Property
- FIFRA/TSCA Tracking System (FTTS) – Target Property
- Historic FIFRA/TSCA Tracking System (HIST FTTS) – Target Property
- FIFRA Section 7 Tracking Systems (STTS) – Target Property
- Integrated Compliance Information System (ICIS) – Target Property

- PCB Activity Database System (PADS) – Target Property
- Material Licensing Tracking System (MLTS) – Target Property
- Radiation Information Database (RADINFO) – Target Property
- Facility Index System (FINDS) – Target Property
- RCRA Administrative Action Tracking System (RAATS) – Target Property
- State Coalition for Remediation of Drycleaners Listing (SCRD DRYCLEANERS) – 0.5 mile

STATE/LOCAL DATABASES

- Michigan Department of Environmental Quality (MDEQ) Contaminated Sites List (SHWS)– 1 mile
- Delisted List of Contaminated Sites (DEL SHWS) – 1 mile
- MDEQ Solid Waste Facilities Database (SWF/LF) – 0.5 mile
- MDEQ Inactive Solid Waste Facilities (HIST LF) – 0.5 mile
- MDEQ Leaking Underground Storage Tank Sites (LUST) – 0.5 mile
- MDEQ Underground Storage Tank Facility List (UST) – 0.25 mile
- MDEQ Registered Aboveground Storage Tanks (AST) – 0.25 mile
- MDEQ Lien List (LIENS) – Target Property
- Spills (Spills) – Target Property
- MDEQ Engineering and Institutional Controls (AUL) – 0.5 mile
- Drycleaners (DRYCLEANERS) – 0.25 mile
- Brownfields Sites (BROWNFIELDS) – 0.5 mile
- Clandestine Drug Lab Listing (CDL) – Target Property
- MDEQ National Pollutant Discharge Elimination System List (NPDES) – Target Property
- MDEQ Permit and Emissions Inventory Data (AIRS) – Target Property
- MDEQ Baseline Environmental Assessment Database (BEA) – 0.5 mile

TRIBAL RECORDS

- Indian Reservations (INDIAN RESERV) – 1 mile
- Indian ODI (INDIAN ODI) – 0.5 mile
- Indian LUST (INDIAN LUST) – 0.5 mile
- Indian UST (INDIAN UST) – 0.25 mile
- Indian VCP (INDIAN VCP) – 0.5 mile

EDR PROPRIETARY HISTORICAL DATABASES

- Manufactured Gas Plants – 1 mile
- EDR Historical Auto Stations – 0.25 mile
- EDR Historical Cleaners – 0.25 mile

OTHER DATABASES

- Federal Emergency Management Agency (FEMA) Flood Zone Data – 1 mile
- National Wetlands Inventory (NWI) – Not available
- AQUIFLOW – 1 mile
- Radon – Federal and State Radon Information – Target Property
- Federal USGS, Federal FRDS, and State Wells – 1 mile

Based on a review of the EDR database report, the Site was not identified in any of the searched databases; therefore, additional environmental information relevant to the Site was not obtained from the EDR report.

Based on review of the EDR database report, 127 mapped facilities on 14 database listings were identified within one mile of the Site. The databases identified include: CERCLIS, CERCLIS-NFRAP, RCRA-CORRACTS, RCRA-CESQG, RCRA-SQG, RCRA-NonGen, BEA, LUST, UST, SHWS, AST, Brownfields, Historical Cleaners, and Historical Auto Stations. The following is a summary of the mapped properties identified within 1/8-mile of the Site:

Surrounding Properties Database Listings – Within 1/8-Mile

Entity Listed / Address	Location Relative to Site	Database	Comments / Status of Listing
Home Laundry Co. 6238 Cass Ave, Detroit, MI	<0.125 mile ENE	Historical Cleaners	<ul style="list-style-type: none"> The facility is listed as a laundry in 1926. No further information is included in the listing.
Brake Service Corp. 6204 Cass Ave, Detroit, MI	<0.125 mile SE	Historical Auto Stations	<ul style="list-style-type: none"> The facility is listed as an automobile repairing facility in 1926. No further information is included in the listing.
TEF Four LLC 435 Amsterdam Detroit, MI 48202	<0.125 mile SSW	RCRA-SQG	<ul style="list-style-type: none"> EPA ID: MIK227822129. A former small quantity generator of hazardous waste. No TSD activities or violations are reported.
University Prep Elementary II 435 Amsterdam Detroit, MI 48202	<0.125 mile SSW	UST	<ul style="list-style-type: none"> Facility ID: 00042091. One 2,000-gallon used oil UST was installed on an unknown date and removed from the ground on April 4, 2008.
Dagleish Cadillac-Oldsmobile Inc. 6160 Cass Ave Detroit, MI 48202	<0.125 mile SE	FINDS RCRA-SQG LUST UST	<ul style="list-style-type: none"> RCRA information system EPA ID: MID006530737. A conditionally exempt small quantity generator of hazardous waste. No TSD activities or violations are reported. Facility ID 00006357. Leak Number C-0103-93. A release of an unknown substance occurred on January 13, 1993. The case was closed on January 23, 1995. Facility ID 00006357. One 4,000-gallon gasoline UST was installed on February 6, 1976 and removed on January 19, 1993. One 1,500-gallon used oil UST was installed on February 5, 1978 and removed on July 18, 1990. One 1,000-gallon gasoline UST was installed on an unknown date and removed on June 16, 1994. Eight 30-gallon hydraulic oil USTs were present on the facility: five were installed on February 6, 1976; two were installed on February 5, 1981; and one was installed on February 6, 1984. All of the hydraulic oil USTs were removed on June 16, 1994.

Entity Listed / Address	Location Relative to Site	Database	Comments / Status of Listing
6200 Second Street Detroit, MI	<0.125 mile SW	US Brownfields	<ul style="list-style-type: none"> The recipient of the Brownfield funding was listed as the Wayne County Brownfield Redevelopment Authority. A Phase I Environmental Assessment was completed on September 30, 2000.
James Martin Chevrolet, Inc. 6250 Woodward Detroit, MI 48202	<0.125 mile ENE	RCRA-SQG FINDS LUST UST	<ul style="list-style-type: none"> EPA ID: MID064186984. A small quantity generator of hazardous waste. No TSD activities are reported. No TSD activities or violations are reported. RCRA information system. Facility ID: 00002582. Leak ID: C-1912-92. A release of gasoline occurred on October 28, 1992 and was closed on October 19, 1993 One 3,000-gallon gasoline UST was installed on May 5, 1976 and removed on November 1, 1993. One 4,000-gallon gasoline UST was installed on July 18, 1994 and is listed as currently in use.
Superior Auto Sales and Service 6227 Woodward Ave Detroit, MI	<0.125 mile ENE	Historical Auto Stations	<ul style="list-style-type: none"> The facility is listed as an automobile repairing facility in 1926. No further information is included in the listing.
American Electrical Heater Co 6110 Cass Detroit, MI 48202	<0.125 mile SSE	FINDS RCRA-NonGen	<ul style="list-style-type: none"> RCRA Info program EPA ID MID985584192. The facility does not generate hazardous waste. No TSD activities or violations are reported.
Baltimore-Cass Parking Company 65 W Baltimore Detroit, MI 48202	<0.125 mile North	RCRA-NonGen	<ul style="list-style-type: none"> EPA ID MIK667994966. The facility does not generate hazardous waste. No TSD activities or violations are reported.
Auto Enterprises, Inc 65 W Baltimore Detroit, MI	<0.125 mile North	Historical Auto Stations	<ul style="list-style-type: none"> The facility is listed as an automobile garage facility in 1926 (Donald Thurber), 1935 (Detroit Garages), and 1940 (Detroit Garages). The facility is listed as an automobile repairing facility in 1965 (Auto Enterprises, Inc). No further information is included in the listing.
Cass Car Storage Co 65 W Baltimore Detroit, MI	<0.125 mile North	Historical Auto Stations	<ul style="list-style-type: none"> The facility is listed as an automobile garage facility in 1956. No further information is included in the listing.

Entity Listed / Address	Location Relative to Site	Database	Comments / Status of Listing
Puritan Stations, Inc Office 403 W Baltimore Ave Detroit, MI	<0.125 mile WNW	Historical Auto Stations	<ul style="list-style-type: none"> The facility is listed as gasoline and oil service station in 1940. No further information is included in the listing.
Wayne State University 435 Burroughs Detroit, MI 48202	<0.125 mile South	RCRA- NonGen	<ul style="list-style-type: none"> EPA ID MIK325852192. The facility does not generate hazardous waste. No TSDF activities or violations are reported.
Asterand Inc 440 Burroughs St Detroit, MI 48202	<0.125 mile South	RCRA- CESQG	<ul style="list-style-type: none"> EPA ID: MIK346614647. A small quantity generator of hazardous waste. No TSDF activities are reported. No TSDF activities or violations are reported.
Techone 440 Burroughs St Detroit, MI 48202	<0.125 mile South	RCRA-SQG FINDS	<ul style="list-style-type: none"> EPA ID: MID980793988. A small quantity generator of hazardous waste. No TSDF activities are reported. No TSDF activities are reported. The facility had two violations on January 16, 2007; one of a state regulation and one generators-manifest. Both violations were corrected on March 27, 2007. RCRA information system.
Former Chevrolet Creative Services (CSS) Property 440 Burroughs St Detroit, MI 48202	<0.125 mile South	LUST UST BEA	<ul style="list-style-type: none"> Facility ID: 00041401. Leak Number C-0390-03. A release of an unreported substance occurred on October 2, 2003. The case status is listed as open. Facility ID: 00041401. The facility is listed as closed. One 1,000-gallon UST of unknown contents was on an unknown dated and removed from the ground on September 19, 2003. BEA Number: 1912. A Category N BEA was submitted by Wayne State University on December 27, 2002. A determination is pending.
Unisys Corp 700 Amsterdam St Detroit, MI 48232	<0.125 mile WSW	UST FINDS RCRA- NonGen	<ul style="list-style-type: none"> Facility ID: 00001557. The facility is listed as closed. One 1,000-gallon gasoline UST was installed on April 1, 1971 and removed from on September 30, 1990. One 10,000-gallon gasoline UST was installed on March 31, 1976 and removed January 13, 1992. RCRA Info program EPA ID MID985568211. The facility does not generate hazardous waste. No TSDF activities or violations are reported.

Entity Listed / Address	Location Relative to Site	Database	Comments / Status of Listing
Wayne State University 461 Burroughs St Detroit, MI 48202	<0.125 mile South	RCRA- CESQG	<ul style="list-style-type: none"> EPA ID: MIK222418931. A small quantity generator of hazardous waste. No TSDf activities are reported. No TSDf activities or violations are reported.
NextEnergy Center 461 Burroughs St Detroit, MI 48202	<0.125 mile South	RCRA- CESQG	<ul style="list-style-type: none"> EPA ID: MIK574228680. A small quantity generator of hazardous waste. No TSDf activities are reported. No TSDf activities or violations are reported.
Baltimore-Cass Parking Company 65 W Baltimore Detroit, MI 48202	<0.125 mile North	UST LUST	<ul style="list-style-type: none"> Facility ID: 00006491. The facility is listed as closed. Three 2,000-gallon gasoline USTs were installed on January 28, 1979 and removed from on July 2, 1990. Facility ID: 00006491. Leak Number C-0298-06. A release of gasoline & diesel occurred on May 27, 2003. The case status is listed as open.
Baltimore-Cass Parking Company 31 - 65 W Baltimore Detroit, MI 48202	<0.125 mile North	BEA	<ul style="list-style-type: none"> BEA No. 3089. A BEA was submitted on March 20, 2006 under the no hazardous substance category for disclosure only.
Boulevard Heating Plant 475 W Baltimore Detroit, MI	<0.125 mile WNW	BEA	<ul style="list-style-type: none"> BEA No. 1982. A BEA was submitted on April 1, 2003, under the different hazardous substance category for disclosure only.
Gold Max 28 W Baltimore Detroit, MI	<0.125 mile NNE	Historical Cleaners	<ul style="list-style-type: none"> The facility is listed as a laundry in 1926. No further information is included in the listing.
Woodward Laundry 6335 Woodward Detroit, MI	<0.125 mile NNE	Historical Cleaners	<ul style="list-style-type: none"> The facility is listed as a laundry in 1926. No further information is included in the listing.

The following SHWS and open LUST database listings were identified within 1 mile of the Site:

Surrounding Properties Database Listings – Within 1Mile of the Site

Entity Listed / Address	Location Relative to Site	Database	Comments / Status of Listing
65 Piquette Property 65 Piquette Detroit, MI	0.125 to 0.25 mile E	SHWS	<ul style="list-style-type: none"> Facility ID 82001639: A commercial printing facility is listed as the source. The SAM score was 17 out of 48. The facility status is listed as inactive.

Entity Listed / Address	Location Relative to Site	Database	Comments / Status of Listing
Stainless Inc 310 Piquette St Detroit, MI 48202	0.25 to 0.5 mile ENE	FINDS LUST RCRA-NonGen	<ul style="list-style-type: none"> • RCRA Info Program. • Facility ID: 50000809. Leak Number C-0390-93. A release of gasoline occurred on May 16, 1990. The case status is listed as open. • EPA ID MID005369723. The facility does not generate hazardous waste. No TSD activities or violations are reported.
John R & I-94 Gas Station 5901 John R St Detroit, MI 48202	0.25 to 0.5 mile ESE	LUST UST	<ul style="list-style-type: none"> • Facility ID: 00041226. Leak Number C-0208-02. A release of an unknown substance occurred on March 27, 2002. The case status is listed as open. • Facility ID: 00041226. The facility is listed as active. Three USTs were installed on January 1, 1993: one 12,000-gallon gasoline; one 8,000-gallon gasoline; and one 6,000-gallon diesel. All tanks are listed as temporarily out of use at an unspecified date.
Heritage Investment Co Inc 411 Piquette, Ave Detroit, MI 48202	0.25 to 0.5 mile ENE	LUST UST	<ul style="list-style-type: none"> • Facility ID: 00041274. Leak Number C-0595-02. A release of unknown substances occurred on October 28, 2002. The case status is listed as open. • Leak Number C-0672-02. A release of gasoline and diesel occurred on November 25, 2002. The case status is listed as open. • Facility ID: 00041274. The facility is listed as closed. Twelve USTs were installed on unknown dates. All USTs were removed between October 25 and November 6, 2002.

EEC reviewed information on the mapped properties based on information provided in the EDR report, respective distances from the Site, and hydrological relationships with respect to the Site. No RECs or other environmental issues were identified relative to the Site.

A total of 20 unmapped or “orphan” facilities were identified in the vicinity of the Site in the EDR report. Based on the available information the facility listed in the orphan summary does not currently appear to present any RECs or other environmental issues relative to the Site.

2.3.2 Regulatory Agency Contacts

Regulatory agencies were contacted for information regarding the Site. Regulatory correspondence is included in Appendix B. The information obtained from the contacts is summarized in the following paragraphs:

- EEC searched the EPA Envirofacts Internet site for available environmental information related to the Site. The Site was not listed on the Envirofacts database.
- EEC searched the EPA Enforcement and Compliance History Online (ECHO) Internet site for available environmental information related to the Site. The Site was not listed on the ECHO database.
- EEC submitted a Freedom of Information Act (FOIA) request to the Michigan Department of Environmental Quality (MDEQ) to obtain all available records regarding current and former USTs/ASTs, LUST releases, hazardous waste storage and use inspections or violations, air and discharge permits, and any environmental non-compliance issues for the Site. Responses from the Land and Water Management Division, Waste and Hazardous Materials Division, Air Quality Division, Remediation and Redevelopment Division, and Water Bureau are pending.
- EEC searched the MDEQ - Underground and Leaking Underground Storage Tank databases on the Internet. The Site is not listed on the UST or LUST databases
- EEC searched the MDEQ – Waste and Hazardous Material Division database on the Internet. The Site is not listed on the database.
- EEC submitted a FOIA request to the City of Detroit Department of Environmental Affairs to obtain all available records regarding current and former USTs/ASTs, LUST releases, hazardous waste storage and use inspections or violations, air and discharge permits, and any environmental non-compliance issues for the Site. A response is pending.
- EEC submitted a FOIA request to the City of Detroit Health and Wellness Promotion Department to obtain all available records regarding current and former USTs/ASTs, LUST releases, hazardous waste storage and use inspections or violations, air and discharge permits, and any environmental non-compliance issues for the Site. A response is pending.
- EEC submitted a FOIA request to the City of Detroit Buildings and Safety Engineering Department to obtain all available records regarding code violations, building safety issues, and environmental non-compliance issues for the Site. A response is pending.
- EEC searched the City of Detroit Planning and Development Department Zoning Map for zoning information regarding the Site. The Site is zoned SD-2, Special Purpose.

No RECs or other environmental issues were noted in association with regulatory agency contact information for the Site.

2.3.3 Water Well Survey

No groundwater wells or monitoring wells were observed by EEC at the Site, listed at the Site in the EDR report, or stated to be present by Site personnel.

EDR conducted a records search of the Federal USGS, Federal Reporting Data System (FRDS) Public Water Supply (PWS) System, and State databases of wells located within approximately one mile of the Site. No Federal FRDS, Federal USGS wells or State wells were identified within 1 mile of the Site. No public water supply wells were identified within 1 mile of the Site.

2.3.4 Utility Services

The Site is vacant and therefore there is no electrical, natural gas or potable water service. In the vicinity of the Site, electricity and natural gas services are provided by DTE Energy, and water and sanitary sewer services are provided in the vicinity of the Site by the City of Detroit. Storm sewer services are provided to the Site by the City of Detroit. Trash removal services are not supplied to the Site.

No other environmental issues were noted in association with the utility services.



3.0 CONCLUSIONS

Encore Environmental Consortium, LLC (EEC) has conducted a Phase I Environmental Site Assessment (ESA) of Parking Lot 8 located at 6241 Amsterdam and 406 Cass located in Dearborn, Michigan 48126 (herein referred to as “the Site”). The purpose of the Phase I ESA was to identify and document the current and historical environmental conditions of the Site and the presence of substances which indicate an existing, past, or potential adverse environmental impact to the air, soil, groundwater, or surface waters as a result of operations on the Site and adjacent and surrounding properties, and which indicate that further investigation may be necessary to evaluate potential environmental liabilities associated with the Site.

This Phase I ESA was performed in general accordance with the American Society for Testing and Materials (ASTM) E 1527-00 Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process, and other client-specified requirements. The investigation was intended to identify Recognized Environmental Conditions (RECs) as defined by the ASTM E 1527-00 Standard.

A. RECOGNIZED ENVIRONMENTAL CONDITIONS

This assessment has revealed no evidence of RECs in connection with the Site except the following:

- According to previous reports, a Phase II ESA was conducted in March 2007 to assess the potential for impacts to the Site from former operations. Soil borings were completed in the vicinity of former storage areas, manufacturing operations, and near the railroad spur locations. Groundwater was not encountered to a depth of 14 feet below ground level (bgl). Soil samples were collected from the soil borings and submitted to a laboratory to be analyzed for volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), polychlorinated biphenyls (PCBs), and priority pollutant metals list. Two samples contained concentrations of benzo(a)pyrene (BAP) at concentrations in soil greater than the Michigan Department of Environmental Quality (MDEQ) Generic Residential Direct Contact (GRDC) Soil Cleanup Criterion. Other polynuclear aromatic hydrocarbons (PAHs) were detected at concentrations below the MDEQ-GRDC. Based on these results, it was determined that the Site would be classified as a “facility” as defined by Section 20107a of Part 201 of the Natural Resources and Environmental Protection Act (NREPA), 1994 PA 451, as amended (Part 201). Results for VOCs and the remaining SVOCs were non-detect, and the metals results were either non-detect or were detected below background concentrations. An additional subsurface investigation was conducted in August 2007 to delineate the identified soil impacts. Concentrations of BAP were identified in the western portion of the Site above the MDEQ Generic Commercial IV Direct Contact (GCDC) Cleanup Criterion; however, the two areas of BAP impacts were delineated. The Commercial IV land use scenario is the appropriate designation for the current use of the Site as a parking lot. The presence of soil impacts at concentrations above the MDEQ land use scenario generic criteria requires the Site to remediate the impacts or impose a land use restriction on the deed that eliminates the potential for contact with the impacted soil. There is no record of the impacts having been remediated or of a land use restriction having been placed on the deed controlling operations in the impacted area. Based on the lack of documentation of remediation or land use restriction in the vicinity of the BAP impacts, the concentrations of BAP in soil exceeding the MDEQ-GRDC Criterion represents a REC. In addition, residual concentrations of PAHs in the soil on the Site represent an other environmental issue.
- During the Phase II ESA and delineation subsurface investigation the following identified areas of concern were not investigated: the former lead smelting building (Detroit Motor Company); the former varnishing/finishing area and former oil storage room (Cadillac Motor Car Company);

and a former unknown structure in the northeastern portion of the Site. Furthermore, only one soil boring was completed in the vicinity of the former ground-level railroad spurs, which spanned approximately 150 feet within the northern border Site. The former lead smelting building, former varnishing/finishing area and former oil storage room, former unknown structure in the northeastern portion of the Site, and former ground-level railroad spurs spanning the northern border of the Site represent RECs.

B. HISTORICAL RECs

This assessment has not revealed evidence of historical REC in connection with the Site.

C. OTHER ENVIRONMENTAL ISSUES

In addition to the ASTM Standard, this assessment evaluated other client-specified criteria for the Site. With the exception of the other environmental issue described above, this assessment has revealed no evidence of additional other environmental issues at the Site.



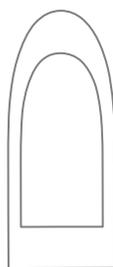
4.0 QUALIFICATIONS AND LIMITATIONS

This Report was prepared pursuant to the agreement dated January 2, 2002 with Encore Environmental Consortium, LLC (“EEC”). All uses of this Report are subject to, and deemed acceptance of, the conditions and restrictions contained in the referenced Agreement. The observations and conclusions described in this Report are based solely on the scope of services provided pursuant to the Agreement. EEC has not performed any additional observations, investigations, studies, or other testing not specified in the Agreement. EEC shall not be liable for the existence of any condition the discovery of which would have required the performance of services not authorized under the Agreement.

This Report is prepared for the exclusive use of GM Worldwide Real Estate. Use of this Report by any person or entity other than GM Worldwide Real Estate shall be at such other person’s or entity’s sole risk, and shall be without legal exposure or liability to EEC.

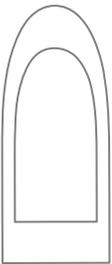
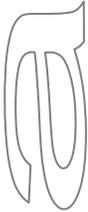
 This Report reflects Site conditions observed and described by records available to EEC as of the date of the Report. The passage of time may result in significant changes in site conditions or technology which could alter the findings and/or recommendations of the Report. Accordingly, EEC shall bear no liability for deviations from observed conditions or available records after the date of the Report.

 EEC shall not be responsible for conditions or consequences arising from relevant facts that were concealed, withheld or not fully disclosed at the time the assessment was conducted.



5.0 REFERENCES

1. Enecotech Environmental Consultants, Phase I ESA, Part of Outlot 116, Northwest Corner of Amsterdam and Cass Avenues, Detroit, Wayne County, MI; October 22, 1996.
2. The Traverse Group, Inc. (TGI), Phase I ESA, Parking Lot 8, 6241 Cass Avenue, Detroit, MI 48202; January 31, 2005.
3. The Traverse Group, Inc. (TGI), Phase I ESA Update, Parking Lot 8, 6241 Cass Avenue, Detroit, MI 48202; December 22, 2006.
4. The Traverse Group, Inc. (TGI), Phase II ESA, General Motors Parking Lot 8, 6241 Cass Avenue, Detroit, Wayne County, MI 48202; March 16, 2007.
5. The Traverse Group, Inc. (TGI), Debris Disposal and Parking Lot Restoration, Parking Lot 8, 6241 Cass Avenue, Detroit, MI 48202; July 25, 2007.
6. The Traverse Group, Inc. (TGI), Draft Lot 8 Delineation – Summary of Findings, General Motors Parking Lot 8, 6241 Cass Avenue, Detroit, Wayne County, MI 48202; August 27, 2007.
7. The Traverse Group, Inc. (TGI), Draft Due Care Plan, Section 7a Compliance Analysis, General Motors Parking Lot 8, 6241 Cass Avenue, Detroit, Wayne County, MI 48202; October 3, 2007.

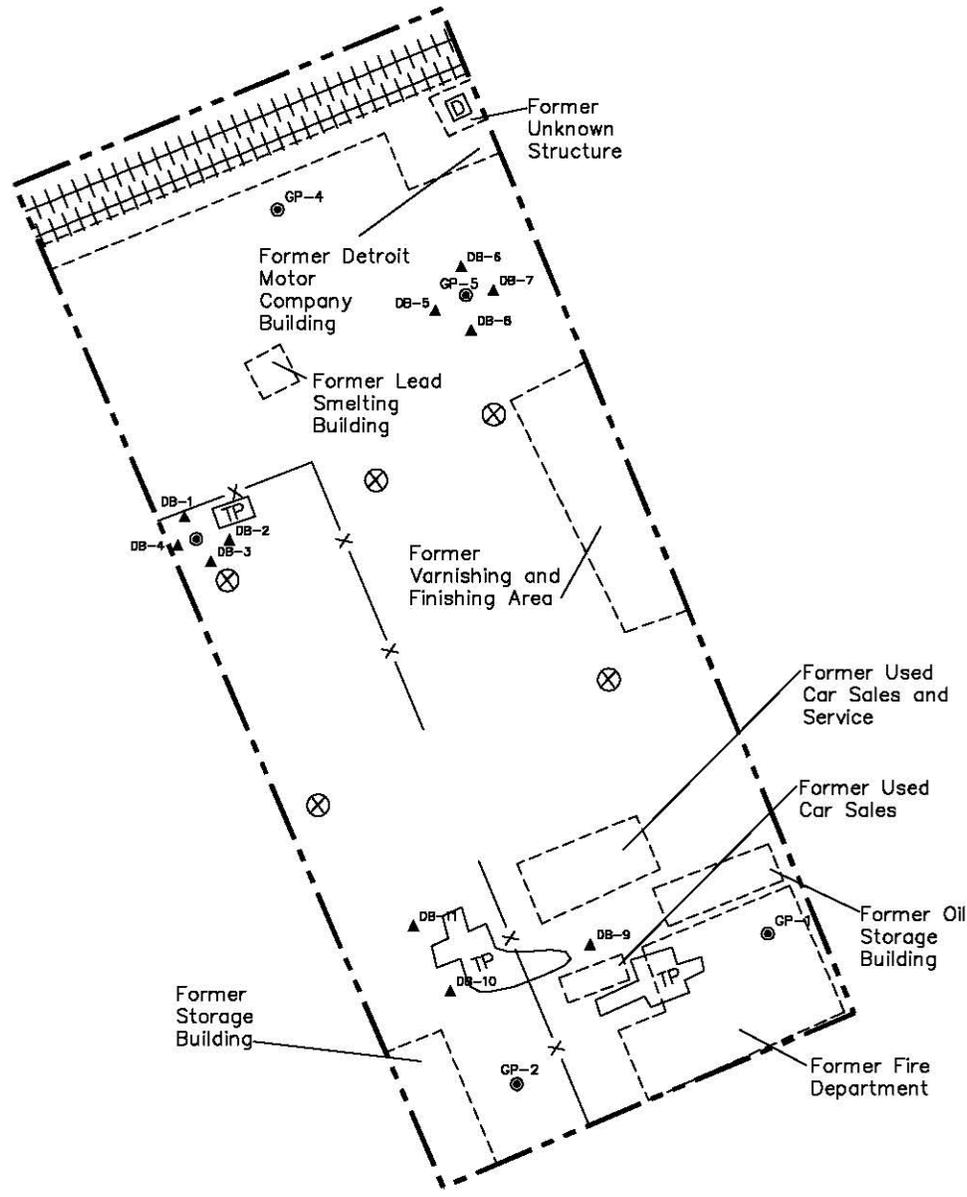


APPENDIX A

Figures

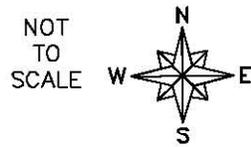
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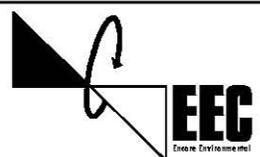
LEGEND

- SITE BOUNDARY
- X- FENCE LINE
- ++++ RAILROAD TRACKS
- ⊗ STORMWATER DRAIN
- D TRASH DUMPSTER
- TP TEST PIT
- PREVIOUS SOIL BORING (TGI; MARCH 2007)
- ▲ PREVIOUS SOIL BORING (TGI; AUGUST 2007)
- FORMER STRUCTURE



PARKING LOT 8
 6241 CASS AND 406 AMSTERDAM
 DETROIT, MICHIGAN 48202

SITE MAP



FIGURE

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APPENDIX B

Contacts and Correspondence

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APPENDIX C

Photographs

DAVID RABBIT

APPENDIX D

Environmental Database Report

(On CD)

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APPENDIX E

Historical Information

(On CD)

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D

APPENDIX F

Previous Reports

EFF
RA
D

APPENDIX G

Personnel Resumes

(On CD)

OFFICE
OF
THE
ATTORNEY GENERAL