



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
LANSING



DAN WYANT  
DIRECTOR

August 25, 2011

Mr. Jeffrey Lippert  
United States Environmental Protection Agency  
Region 5  
Emergency Response Branch  
9311 Groh Road  
Grosse Ile, Michigan 48138

Dear Mr. Lippert:

SUBJECT: Lyndon Street Drum Site  
8100 Lyndon Street, Detroit, Wayne County, Michigan  
MERA No. 82002784  
Applicable, Relevant, and Appropriate Requirements (ARARS)

This letter is in response to your Action Memorandum letter dated August 22, 2011, requesting that the Department of Environmental Quality (DEQ) identify all ARARS in regards to the proposed cleanup at the subject site. As described in your letter, the United States Environmental Protection Agency (EPA) will be funding a time critical removal action to remove several containers of solid waste which is considered hazardous. The material(s) are likely to be RCRA characteristic or listed wastes.

The response activities described in the action memorandum comply with the state regulations governing the following:

1. DEQ cleanup criteria found in Part 201, Environmental Remediation, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (NREPA) and the Part 201 Administrative Rules.
2. Protection of natural resources found in Part 17, Environmental Protection, of NREPA, and the Part 17 Administrative Rules.
3. Waste handling regulations found in Part 111 and Part 115, of NREPA, and the Part 111 and Part 115 Administrative Rules.

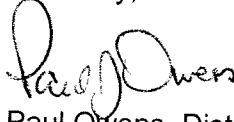
Three potential areas not addressed in the action memorandum include the handling of fugitive dust, the direct contact of soils, and the protection of waters of the State. The State regulations governing these three issues are:

1. Fugitive dust found in Part 55, Air Pollution Control, of the NREPA, and the Part 55 Administrative Rules.
2. Direct contact of soils found in Part 201, Environmental Remediation, of NREPA, and the Part 201 Administrative Rules.

3. Protection of waters of the State found in Part 31, Water Resources Protection, of NREPA, and the Part 31 Administrative Rules.

If you have any questions regarding this matter, please contact Joseph DeGrazia at 586-753-3812; at [degraziaj@michigan.gov](mailto:degraziaj@michigan.gov); or at the DEQ, Southeast Michigan District Office, 27700 Donald Court, Warren, Michigan, 48092.

Sincerely,

A handwritten signature in black ink, appearing to read "Paul Owens". The signature is fluid and cursive, with the first name "Paul" and last name "Owens" clearly distinguishable.

Paul Owens, District Supervisor  
Southeast Michigan District Office  
Remediation Division  
586-753-3821

cc: Mr. Joseph DeGrazia, DEQ