



JENNIFER M. GRANHOLM
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
SOUTHEAST MICHIGAN DISTRICT OFFICE



STEVEN E. CHESTER
DIRECTOR

September 10, 2008

CERTIFIED MAIL – 7005 3110 0003 0525 3232

Mr. Gerald Fodale
Fodale Group, LLC
1600 East Grand Boulevard
Detroit, Michigan 48211

Dear Mr. Fodale:

SUBJECT: Summary Scope of Work for 2900 Orleans Street, Detroit, Wayne County
DEQ Site ID No: 82002593

This letter is to advise you of conditions that are present at 2900 Orleans Street, Detroit, Wayne County, Michigan (Site), which are regulated under Part 201¹ and to provide comments on the Scope of Work (SOW) dated August 29, 2008.

Sampling performed by staff of the Department of Environmental Quality (DEQ), Remediation and Redevelopment (RRD) at the Site detected polychlorinated biphenyls in the soil at 6.9 parts per million (ppm). The concentrations of this hazardous substances exceed the residential cleanup requirements of Section 20120a(1)(a) or (17) of the NREPA, and Part 7 of the Part 201 Administrative Rules (Part 201 Rules). Therefore, the property constitutes a "facility" regulated under Part 201.

The DEQ received a letter from Atwell-Hicks, Incorporated (Atwell) acting on behalf of Fodale, LLC, regarding the SOW at the Site on August 29, 2008. The DEQ has reviewed the SOW and has the following comments:

1. Atwell's SOW is a document that was written for Mr. Tyler Tennent outlining the work that Atwell would be conducting. This is not a Work Plan for a Remedial Investigation (RI). The document should be rewritten as a Work Plan and not a SOW. At a minimum, the RI Work Plan should contain the following:
 - Introduction
 - Site Background
 - Areas of Concern
 - Project Tasks
 - Sampling Plan
 - Project Schedule
 - A scaled drawing illustrating the locations of the proposed 20 soil borings and current Site conditions

1. The U.S. Environmental Protection Agency (U.S. EPA) has also reviewed Atwell's SOW and provided comments (enclosed). The DEQ has reviewed the U.S. EPA's comments and is in concurrence. Rather than reiterating U.S. EPA's comments in this letter, please review the U.S. EPA's comments and incorporate them into an RI Work Plan in the aforementioned format.
2. The Site will eventually require a Remedial Action Plan for closure. Upon completion of the RI, a summary report should be submitted to the DEQ where the findings of the RI are discussed in detail. Based upon the results of the RI, the Fodale Group, LLC should then submit an Interim Response Action Plan (IRAP). The IRAP process appears to be the most applicable approach for this site. More information regarding the IRAP process can be found in R 299.5526 of the Part 201 Rules. This allows for approval of a portion of a RAP, and facilitates the completion of more immediate response actions, which are needed to address the contaminants at this site. The IRAP should be followed by a RAP to address other pathways and administrative issues.

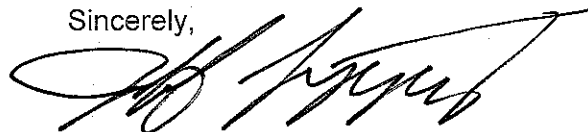
The DEQ requests your written response regarding these matters within 14 days of receipt of this letter.

The DEQ advises you to become familiar with Part 201 and the Part 201 Rules, and to take the necessary steps to comply with any statutory obligations you may have.

The files used to prepare this notice are located in the Southeast Michigan District Office, DEQ, RRD, 27700 Donald Court, Warren, Michigan 48092. If you wish to review the files or if you have questions regarding this letter, please contact me. For more information on environmental remediation in Michigan, including Part 201 and the Part 201 Rules, guidance, and reporting forms, please refer to www.michigan.gov/deq on the internet, and click on "Land/Land Cleanup," or you may contact our office.

Thank you for your prompt attention to this matter.

Sincerely,



Jeff Lippert, Project Manager
Southeast Michigan District
Remediation and Redevelopment Division
586-753-3857

Enclosure

cc: Ms. Lori Kozel, Weston Solutions of Michigan, Incorporated
Mr. Brian Kelly, U.S. EPA
Mr. Oladipo Oyinsan, DEQ
M. Paul Owens, DEQ
Ms. Michelle Bakun, DEQ
cc/enc: Mr. Tyler Tennent, Dawda, Mann, Mulcahy & Sadler, PLC
Mr. Allan Longyear, Atwell-Hicks, LLC