(11th) 4/21/06

SQUIRE, SANDERS & DEMPSEY L.L.P.

1300 Huntington Center
41 South High Street
Columbus, Ohio 43215-6197

Office: +1.614.365.2700
Fax: +1.614.365.2499

SQUIRE SANDERS | LEGAL COUNSEL WORLDWIDE

EPA Region 5 Records Ctr.
366611

jdemonte@ssd.com
614-365-2809

April 21, 2006

VIA FEDERAL EXPRESS

Elise S. Feldman
U.S. Department of Justice
Environmental Enforcement Section
Environmental and Natural Resources Division
601 D Street, Mailroom 2121
Washington DC 20004

Re: EaglePicher Holdings, Inc., et al., No. 05-12601 (Bankr. S.D. Ohio)

Dear Elise:

We are providing you an eleventh round of documents relative to several properties that are proposed for inclusion in the custodial trusts under EaglePicher's First Amended Joint Plan of Reorganization. The enclosed disc contains documents bates-numbered MI0012544 to MI0013212, which relate to the Inkster, Michigan site. These documents are being provided to Jonathan Pierce of the Michigan Attorney General's office. As indicated previously, this production is not a waiver of any right or privilege concerning the documents or the informal requests, including the attorney-client privilege, all of which the Debtors expressly reserve.

If you have any additional questions regarding this production or with respect to the additional issues addressed herein, please do not hesitate to let us know.

Very truly yours,

/s/ Jessica E. DeMonte

Jessica E. DeMonte

Enclosure

cc: Jon Gulch (via Fed Ex)
Jonathan Pierce (Michigan, via Fed Ex)
Paul Harper (via email)
Stephen D. Lerner (via email)
Scott A. Kane (via email)
Karen A. Winters (via email)
Patrick J. Brooks (via email)

JED/acp

U.S. ENVIRONMENTA
PROTECTION AGENC

APR 25 2006

OFFICE OF REGIONA
COUNSEL

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
SOUTHEAST MICHIGAN DISTRICT OFFICE

JENNIFER M. GRANHOLM
GOVERNOR

STEVEN E. CHESTER
DIRECTOR

JAN 31 2003

January 30, 2003

Mr. Doug Rommeck, CHMM
Eagle-Picher Automotive
2638 Princess Street
Inkster, Michigan 48141

Dear Mr. Rommeck:

SUBJECT: Groundwater Investigation and Remediation
Wolverine Gasket Facility
2638 Princess Street, Inkster, Wayne County, Michigan

I have reviewed the January 27, 2003 letter from your environmental consultant, ARCADIS of Southfield, Michigan regarding the proposed investigative and remedial activities at the subject facility. Thank you for providing a prompt submittal of upcoming action items to this office following our January 23, 2003 meeting.

The letter summarizes the action items that Wolverine Gasket will undertake at the site including: enhancing the existing groundwater treatment system, investigating the source of elevated benzene concentrations in groundwater in well MW-9, and assessing the location and orientation of subsurface utilities. It is my understanding that ARCADIS proposes to complete all of the proposed action items by July 31, 2003. I concur with ARCADIS' list of action items and the July 31 deadline for their completion. You are hereby authorized to proceed. Please provide a report documenting the results of each action item to this office by July 31, 2003.

As we discussed last week during our meeting, I will be transferring to the Department of Environmental Quality (DEQ) Cadillac District Office effective Monday, February 3, 2003. At that time, this project will be transferred to another DEQ project manager. I am unaware who that individual will be at this time, so in the event that you have any questions after tomorrow, please contact Mr. Steve Kitler at 734-953-1458.

Sincerely,

James J. Ferritto, Jr., Senior Geologist
Southeast Michigan District Office
Remediation and Redevelopment Division
734-953-1429

cc: Mr. Steven Kitler, DEQ

38980 SEVEN MILE ROAD • LIVONIA, MICHIGAN 48152-1006
www.michigan.gov • (734) 953-8900

ARCADIS

Infrastructure, buildings, environment, communications

JAN 29 2003

ARCADIS G&M of Michigan, LLC
25200 Telegraph Road
Southfield
Michigan 48034
Tel 248 936 8000
Fax 248 936 8111
www.arcadis-us.com

Mr. James Ferrito, C.P.G.
Michigan Department of Environmental Quality
38980 Seven Mile Road
Livonia, Michigan 48152-1006

ENVIRONMENTAL

Subject:
January 23, 2003 Site Strategy Meeting for the Wolverine Gasket Site Located in Inkster, Michigan.

Date:
January 27, 2003

Contact:
Kevin Wilson

Phone:
8708

Email:
kwilson@arcadis-us.com

Our ref:
MI000745.0005

Dear Mr. Ferrito:

Thank you for taking the time to meet with Wolverine Gasket and ARCADIS to discuss the redesign plans for the groundwater treatment system; the results of the November 11, 2002 site investigation; and the overall site strategy. The following pages summarize the results of our discussions and identify action items and the schedule that will be implemented as Wolverine Gasket moves toward industrial closure at the site.

Groundwater Treatment System

As presented in the Remedial Action Plan, the objective of the remedial method is to enhance the biodegradation of the hydrocarbon mass in the perched aquifer by adding oxygen to the aquifer. The current groundwater treatment system was designed to accomplish this by adding oxygen in the form of hydrogen peroxide to the perched aquifer. Wolverine Gasket is planning to upgrade the system by adding an air stripper to the treatment process and rehabilitating or replacing the groundwater injection trench. Wolverine Gasket is also planning to apply for an industrial wastewater discharge permit to discharge a portion of the treated water to the sanitary sewer. These changes should enhance the groundwater remediation performance at the site. The air stripper will treat the extracted groundwater, providing treated water saturated with oxygen that can be injected into the perched aquifer. Replacement or rehabilitation of the groundwater infiltration trench is necessary to deliver the oxygen-enriched water to the perched aquifer. Discharging a portion of the treated water to the sanitary sewer will allow the groundwater treatment system to better achieve hydraulic control.

The redesign of the system and installation of the new components are expected to require approximately six months. Therefore, assuming that both the industrial

wastewater discharge permit and the air discharge permit can be obtained within that time frame, the enhanced groundwater treatment system should be operational by July 31, 2003. Additional information regarding the enhanced design of the groundwater treatment system, including expected system performance, redesign details, and a performance monitoring schedule, will be provided to the Michigan Department of Environmental Quality at a future date.

Investigation Results

The November 11, 2002 site investigation identified a substantial benzene concentration in the westernmost monitoring well (Monitoring Well MW-9). This benzene concentration is approximately three times greater than any previously identified benzene concentration at the site. We believe this indicates a different benzene source, which may be located off the Wolverine Gasket property. To further investigate this possibility, Wolverine Gasket intends to submit a request through the Freedom of Information Act (FOIA) to collect information on the presence of contamination on adjacent properties. In addition to submitting the FOIA request, Wolverine Gasket intends to resample the monitoring well during the next groundwater monitoring event. Based on the results of the FOIA and the groundwater monitoring Wolverine Gasket will evaluate the need to conduct further investigative activities to the west of the Wolverine Gasket property boundary.

The FOIA request will be submitted followed by review of any documentation that may be obtained. This review should be completed within six months of obtaining the site data.

Utility Assessment

Wolverine Gasket intends to review existing site information and determine a strategy for locating the pathway of the existing storm-water management system. This strategy could involve dye tracing, video logging, or radio frequency tracing. These activities will be completed in conjunction with the investigation of offsite sources.

Wolverine Gasket intends to undertake the above activities focusing on the system upgrade as a separate issue from the investigation results. Wolverine Gasket expects that the site will be closed using a limited industrial closure strategy.

If you have any questions or comments with regard to this letter, please contact Doug Rommeck at (313) 724-2006.

Sincerely,

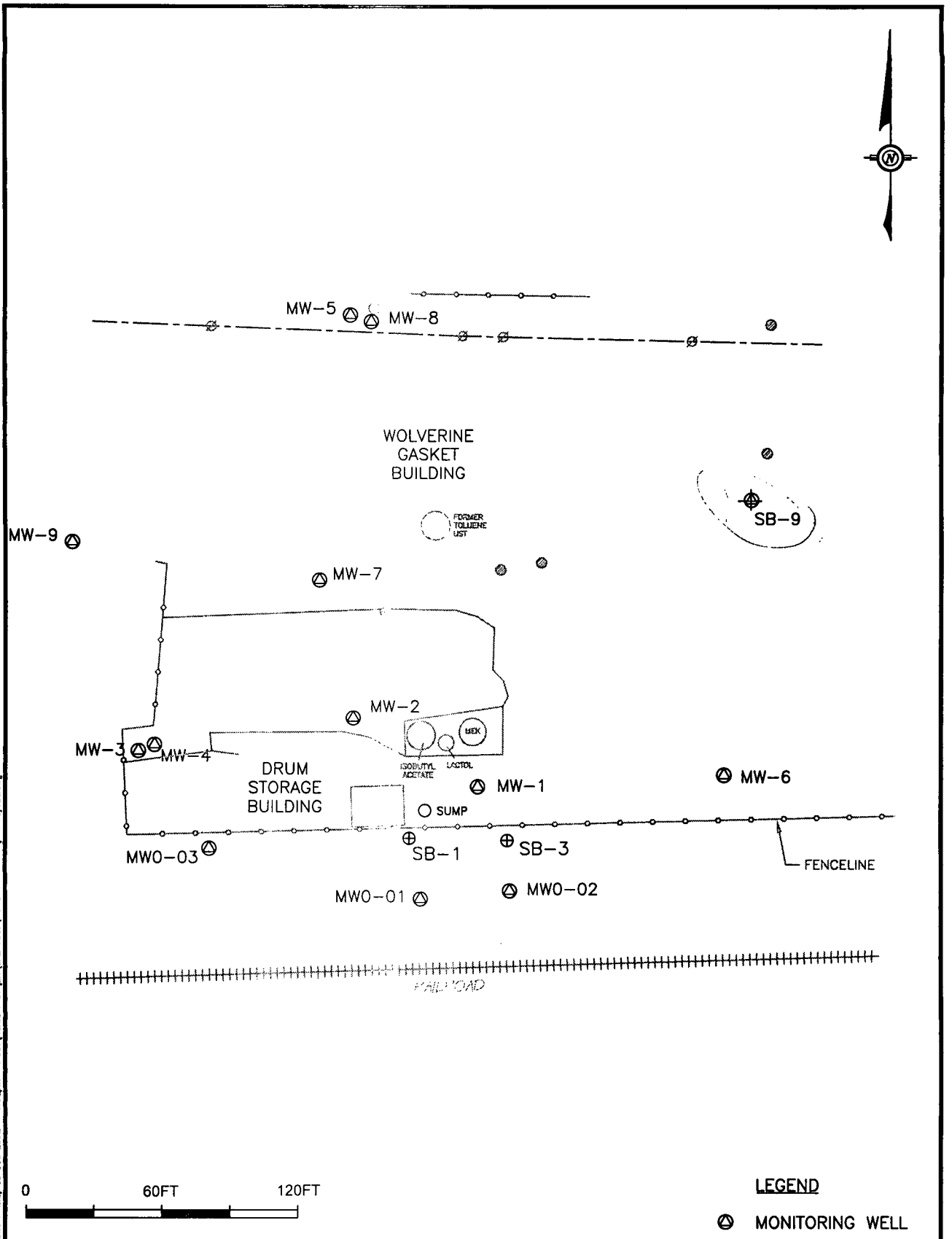
ARCADIS G&M of Michigan, LLC.

Kevin R. Wilson
Geologist

Joseph A. Quinnan, P.E./P.G.
Principal Engineer

Robert A. Ferree, C.P.G.
Vice President

Copies:
Douglas Rommeck, C.H.M.M. – Wolverine Gasket



ARCADIS
25200 TELEGRAPH ROAD
SOUTHFIELD, MICHIGAN 48034
TEL: 248.936.8000
FAX: 248.936.8111

SITE LAYOUT MAP
EAGLE-PICHER
AUTOMOTIVE GROUP
WOLVERINE GASKET DIVISION
INKSTER, MICHIGAN

DATE	PROJECT MANAGER	DRAWING NAME
23-SEP-02	J. QUINNAN	site layout
DRAWN TRY	LEAD DESIGN PROF.	CHECKED K. WILSON
PROJECT NUMBER		FIGURE NUMBER
MI000745.0003		2

User Name : kralson Date\Time : Thu, 05 Dec 2002 - 4:32pm Path\Name : G:\ER\CAD Files\Wolverine Gasket\site layout.dwg

Fibertec
environmental
services

ANALYTICAL LABORATORY RESULTS

CLIENT IDENTIFICATION:	ARCADIS G & M	SAMPLE MATRIX:	SOIL
FIBERTEC PROJECT NO:	71047	FIBERTEC SAMPLE NUMBER:	002

CLIENT SAMPLE INFORMATION

PROJECT IDENTIFICATION:	WOLVERINE GASKET INKSTER, MI	CLIENT SAMPLE DESCRIPTION:	SB-9 8'-9'
PROJECT NUMBER:	MI000745.0005.00002	CLIENT SAMPLE NUMBER:	2
SAMPLE DATE:	11/11/2002	CHAIN OF CUSTODY NUMBER:	24165

COMMENTS: ALL RESULTS REPORTED ON AN AS RECEIVED, WET WEIGHT BASIS

DEFINITIONS: ND = NOT DETECTED AT OR ABOVE REPORTING LIMIT; RL = REPORTING LIMIT
N/A = NOT AVAILABLE OR NOT APPLICABLE

ANALYTE	RESULT	UNITS	RL	METHOD	BATCH	EXTRACTION DATE	ANALYSIS DATE	TECH. INIT.
ACETONE	ND	ug/Kg	750	5035/8260	23922	11/11/2002	11/19/2002	BP
ACROLEIN	ND	ug/Kg	50	5035/8260	23922	11/11/2002	11/19/2002	BP
ACRYLONITRILE	ND	ug/Kg	2,500	5035/8260	23922	11/11/2002	11/19/2002	BP
BENZENE	ND	ug/Kg	50	5035/8260	23922	11/11/2002	11/19/2002	BP
BROMOBENZENE	ND	ug/Kg	100	5035/8260	23922	11/11/2002	11/19/2002	BP
BROMOCHLOROMETHANE	ND	ug/Kg	100	5035/8260	23922	11/11/2002	11/19/2002	BP
BROMODICHLOROMETHANE	ND	ug/Kg	100	5035/8260	23922	11/11/2002	11/19/2002	BP
BROMOFORM	ND	ug/Kg	100	5035/8260	23922	11/11/2002	11/19/2002	BP
BROMOMETHANE	ND	ug/Kg	250	5035/8260	23922	11/11/2002	11/19/2002	BP
2-BUTANONE	ND	ug/Kg	750	5035/8260	23922	11/11/2002	11/19/2002	BP
N-BUTYLBENZENE	ND	ug/Kg	50	5035/8260	23922	11/11/2002	11/19/2002	BP
CARBON DISULFIDE	ND	ug/Kg	250	5035/8260	23922	11/11/2002	11/19/2002	BP
CARBON TETRACHLORIDE	ND	ug/Kg	50	5035/8260	23922	11/11/2002	11/19/2002	BP
CHLOROBENZENE	ND	ug/Kg	50	5035/8260	23922	11/11/2002	11/19/2002	BP
CHLOROETHANE	ND	ug/Kg	250	5035/8260	23922	11/11/2002	11/19/2002	BP
2-CHLOROETHYL VINYL ETHER	ND	ug/Kg	5,000	5035/8260	23922	11/11/2002	11/19/2002	BP
CHLOROFORM	ND	ug/Kg	50	5035/8260	23922	11/11/2002	11/19/2002	BP
CHLOROMETHANE	ND	ug/Kg	250	5035/8260	23922	11/11/2002	11/19/2002	BP
2-CHLOROTOLUENE	ND	ug/Kg	50	5035/8260	23922	11/11/2002	11/19/2002	BP
4-CHLOROTOLUENE	ND	ug/Kg	50	5035/8260	23922	11/11/2002	11/19/2002	BP
DIBROMOCHLOROMETHANE	ND	ug/Kg	100	5035/8260	23922	11/11/2002	11/19/2002	BP
1,2-DIBROMO-3-CHLOROPROPANE	ND	ug/Kg	250	5035/8260	23922	11/11/2002	11/19/2002	BP
DIBROMOMETHANE	ND	ug/Kg	100	5035/8260	23922	11/11/2002	11/19/2002	BP
1,2-DICHLOROBENZENE	ND	ug/Kg	100	5035/8260	23922	11/11/2002	11/19/2002	BP
1,3-DICHLOROBENZENE	ND	ug/Kg	100	5035/8260	23922	11/11/2002	11/19/2002	BP

1914 Holloway Drive Holt, Michigan 48842 Telephone: (517) 699-0345 Facsimile: (517) 699-0388
7794 Boardwalk Road Brighton, Michigan 48116 Telephone: (248) 446-5700 Facsimile: (248) 446-5701

Fibertec
environmental
services

ANALYTICAL LABORATORY RESULTS

CLIENT IDENTIFICATION:	ARCADIS G & M	SAMPLE MATRIX:	**SOIL**
FIBERTEC PROJECT NO:	71047	FIBERTEC SAMPLE NUMBER:	**002**

CLIENT SAMPLE INFORMATION

PROJECT IDENTIFICATION:	WOLVERINE GASKET INKSTER, MI	CLIENT SAMPLE DESCRIPTION:	**SB-9 8'-9'**
PROJECT NUMBER:	MI000745.0005.00002	CLIENT SAMPLE NUMBER:	**2**
SAMPLE DATE:	11/11/2002	CHAIN OF CUSTODY NUMBER:	**24165**

COMMENTS: ALL RESULTS REPORTED ON AN AS RECEIVED, WET WEIGHT BASIS

DEFINITIONS: ND = NOT DETECTED AT OR ABOVE REPORTING LIMIT; RL = REPORTING LIMIT
N/A = NOT AVAILABLE OR NOT APPLICABLE

ANALYTE	RESULT	UNITS	RL	METHOD	BATCH	EXTRACTION DATE	ANALYSIS DATE	TECH. INIT.
1,4-DICHLOROBENZENE	ND	ug/Kg	100	5035/8260	23922	11/11/2002	11/19/2002	BP
DICHLORODIFLUOROMETHANE	ND	ug/Kg	250	5035/8260	23922	11/11/2002	11/19/2002	BP
1,1-DICHLOROETHANE	ND	ug/Kg	50	5035/8260	23922	11/11/2002	11/19/2002	BP
1,2-DICHLOROETHANE	ND	ug/Kg	50	5035/8260	23922	11/11/2002	11/19/2002	BP
CIS-1,2-DICHLOROETHENE	ND	ug/Kg	50	5035/8260	23922	11/11/2002	11/19/2002	BP
TRANS-1,2-DICHLOROETHENE	ND	ug/Kg	50	5035/8260	23922	11/11/2002	11/19/2002	BP
1,1-DICHLOROETHENE	ND	ug/Kg	50	5035/8260	23922	11/11/2002	11/19/2002	BP
1,2-DICHLOROPROPANE	ND	ug/Kg	50	5035/8260	23922	11/11/2002	11/19/2002	BP
1,3-DICHLOROPROPANE	ND	ug/Kg	50	5035/8260	23922	11/11/2002	11/19/2002	BP
2,2-DICHLOROPROPANE	ND	ug/Kg	50	5035/8260	23922	11/11/2002	11/19/2002	BP
1,1-DICHLOROPROPENE	ND	ug/Kg	50	5035/8260	23922	11/11/2002	11/19/2002	BP
CIS-1,3-DICHLOROPROPENE	ND	ug/Kg	50	5035/8260	23922	11/11/2002	11/19/2002	BP
TRANS-1,3-DICHLOROPROPENE	ND	ug/Kg	50	5035/8260	23922	11/11/2002	11/19/2002	BP
ETHYLBENZENE	ND	ug/Kg	50	5035/8260	23922	11/11/2002	11/19/2002	BP
ETHYLENE DIBROMIDE	ND	ug/Kg	50	5035/8260	23922	11/11/2002	11/19/2002	BP
HEXACHLOROBUTADIENE	ND	ug/Kg	50	5035/8260	23922	11/11/2002	11/19/2002	BP
2-HEXANONE	ND	ug/Kg	2,500	5035/8260	23922	11/11/2002	11/19/2002	BP
IODOMETHANE	ND	ug/Kg	100	5035/8260	23922	11/11/2002	11/19/2002	BP
ISOPROPYLBENZENE	ND	ug/Kg	250	5035/8260	23922	11/11/2002	11/19/2002	BP
4-METHYL-2-PENTANONE	ND	ug/Kg	2,500	5035/8260	23922	11/11/2002	11/19/2002	BP
METHYLENE CHLORIDE	ND	ug/Kg	250	5035/8260	23922	11/11/2002	11/19/2002	BP
2-METHYLNAPHTHALENE	ND	ug/Kg	250	5035/8260	23922	11/11/2002	11/19/2002	BP
MTBE	ND	ug/Kg	250	5035/8260	23922	11/11/2002	11/19/2002	BP
NAPHTHALENE	ND	ug/Kg	250	5035/8260	23922	11/11/2002	11/19/2002	BP
N-PROPYLBENZENE	ND	ug/Kg	100	5035/8260	23922	11/11/2002	11/19/2002	BP

1914 Holloway Drive Holt, Michigan 48842 Telephone: (517) 699-0345 Facsimile: (517) 699-0388
7794 Boardwalk Road Brighton, Michigan 48116 Telephone: (248) 446-5700 Facsimile: (248) 446-5701

Fibertec
environmental
services

ANALYTICAL LABORATORY RESULTS

CLIENT IDENTIFICATION:	ARCADIS G & M	SAMPLE MATRIX:	SOIL
FIBERTEC PROJECT NO:	71047	FIBERTEC SAMPLE NUMBER:	002

CLIENT SAMPLE INFORMATION

PROJECT IDENTIFICATION:	WOLVERINE GASKET INKSTER, MI	CLIENT SAMPLE DESCRIPTION:	SB-9 8'-9'
PROJECT NUMBER:	MI000745.0005.00002	CLIENT SAMPLE NUMBER:	2
SAMPLE DATE:	11/11/2002	CHAIN OF CUSTODY NUMBER:	24165

COMMENTS: ALL RESULTS REPORTED ON AN AS RECEIVED, WET WEIGHT BASIS

DEFINITIONS: ND = NOT DETECTED AT OR ABOVE REPORTING LIMIT; RL = REPORTING LIMIT
N/A = NOT AVAILABLE OR NOT APPLICABLE

ANALYTE	RESULT	UNITS	RL	METHOD	BATCH	EXTRACTION DATE	ANALYSIS DATE	TECH. INIT.
SEC-BUTYLBENZENE	ND	ug/Kg	50	5035/8260	23922	11/11/2002	11/19/2002	BP
STYRENE	ND	ug/Kg	50	5035/8260	23922	11/11/2002	11/19/2002	BP
TERT-BUTYLBENZENE	ND	ug/Kg	50	5035/8260	23922	11/11/2002	11/19/2002	BP
1,1,1,2-TETRACHLOROETHANE	ND	ug/Kg	100	5035/8260	23922	11/11/2002	11/19/2002	BP
1,1,2,2-TETRACHLOROETHANE	ND	ug/Kg	100	5035/8260	23922	11/11/2002	11/19/2002	BP
TETRACHLOROETHENE	ND	ug/Kg	50	5035/8260	23922	11/11/2002	11/19/2002	BP
TOLUENE	ND	ug/Kg	50	5035/8260	23922	11/11/2002	11/19/2002	BP
1,2,3-TRICHLOROBENZENE	ND	ug/Kg	250	5035/8260	23922	11/11/2002	11/19/2002	BP
1,2,4-TRICHLOROBENZENE	ND	ug/Kg	250	5035/8260	23922	11/11/2002	11/19/2002	BP
1,1,1-TRICHLOROETHANE	ND	ug/Kg	50	5035/8260	23922	11/11/2002	11/19/2002	BP
1,1,2-TRICHLOROETHANE	ND	ug/Kg	50	5035/8260	23922	11/11/2002	11/19/2002	BP
TRICHLOROETHENE	ND	ug/Kg	50	5035/8260	23922	11/11/2002	11/19/2002	BP
TRICHLOROFLUOROMETHANE	ND	ug/Kg	100	5035/8260	23922	11/11/2002	11/19/2002	BP
1,2,3-TRICHLOROPROPANE	ND	ug/Kg	100	5035/8260	23922	11/11/2002	11/19/2002	BP
1,2,4-TRIMETHYLBENZENE	ND	ug/Kg	100	5035/8260	23922	11/11/2002	11/19/2002	BP
1,3,5-TRIMETHYLBENZENE	ND	ug/Kg	100	5035/8260	23922	11/11/2002	11/19/2002	BP
VINYL ACETATE	ND	ug/Kg	2,500	5035/8260	23922	11/11/2002	11/19/2002	BP
VINYL CHLORIDE	ND	ug/Kg	100	5035/8260	23922	11/11/2002	11/19/2002	BP
TOTAL XYLENES	ND	ug/Kg	150	5035/8260	23922	11/11/2002	11/19/2002	BP

1914 Holloway Drive Holt, Michigan 48842 Telephone: (517) 699-0345 Facsimile: (517) 699-0388
7794 Boardwalk Road Brighton, Michigan 48116 Telephone: (248) 446-5700 Facsimile: (248) 446-5701

Fibertec
environmental
services

ANALYTICAL LABORATORY RESULTS

CLIENT IDENTIFICATION:	ARCADIS G & M	SAMPLE MATRIX:	SOIL
FIBERTEC PROJECT NO:	71047	FIBERTEC SAMPLE NUMBER:	003

CLIENT SAMPLE INFORMATION

PROJECT IDENTIFICATION:	WOLVERINE GASKET INKSTER, MI	CLIENT SAMPLE DESCRIPTION:	MW-9 7'-8'
PROJECT NUMBER:	MI000745.0005.00002	CLIENT SAMPLE NUMBER:	3
SAMPLE DATE:	11/11/2002	CHAIN OF CUSTODY NUMBER:	24165

COMMENTS: ALL RESULTS REPORTED ON AN AS RECEIVED, WET WEIGHT BASIS
* RAISED RL DUE TO SAMPLE MATRIX

DEFINITIONS: ND = NOT DETECTED AT OR ABOVE REPORTING LIMIT; RL = REPORTING LIMIT
N/A = NOT AVAILABLE OR NOT APPLICABLE

ANALYTE	RESULT	UNITS	RL	METHOD	BATCH	EXTRACTION DATE	ANALYSIS DATE	TECH. INIT.
ACETONE	ND	ug/Kg	750	5035/8260	23922	11/11/2002	11/19/2002	BP
ACROLEIN	ND	ug/Kg	50	5035/8260	23922	11/11/2002	11/19/2002	BP
ACRYLONITRILE	ND	ug/Kg	2,500	5035/8260	23922	11/11/2002	11/19/2002	BP
BENZENE	35,000	ug/Kg	5,000*	5035/8260	23922	11/11/2002	11/20/2002	BP
BROMOBENZENE	ND	ug/Kg	100	5035/8260	23922	11/11/2002	11/19/2002	BP
BROMOCHLOROMETHANE	ND	ug/Kg	100	5035/8260	23922	11/11/2002	11/19/2002	BP
BROMODICHLOROMETHANE	ND	ug/Kg	100	5035/8260	23922	11/11/2002	11/19/2002	BP
BROMOFORM	ND	ug/Kg	100	5035/8260	23922	11/11/2002	11/19/2002	BP
BROMOMETHANE	ND	ug/Kg	250	5035/8260	23922	11/11/2002	11/19/2002	BP
2-BUTANONE	ND	ug/Kg	750	5035/8260	23922	11/11/2002	11/19/2002	BP
N-BUTYLBENZENE	ND	ug/Kg	50	5035/8260	23922	11/11/2002	11/19/2002	BP
CARBON DISULFIDE	ND	ug/Kg	250	5035/8260	23922	11/11/2002	11/19/2002	BP
CARBON TETRACHLORIDE	ND	ug/Kg	50	5035/8260	23922	11/11/2002	11/19/2002	BP
CHLOROBENZENE	42,000	ug/Kg	5,000*	5035/8260	23922	11/11/2002	11/20/2002	BP
CHLOROETHANE	ND	ug/Kg	250	5035/8260	23922	11/11/2002	11/19/2002	BP
2-CHLOROETHYL VINYL ETHER	ND	ug/Kg	5,000	5035/8260	23922	11/11/2002	11/19/2002	BP
CHLOROFORM	ND	ug/Kg	50	5035/8260	23922	11/11/2002	11/19/2002	BP
CHLOROMETHANE	ND	ug/Kg	250	5035/8260	23922	11/11/2002	11/19/2002	BP
2-CHLOROTOLUENE	ND	ug/Kg	50	5035/8260	23922	11/11/2002	11/19/2002	BP
4-CHLOROTOLUENE	ND	ug/Kg	50	5035/8260	23922	11/11/2002	11/19/2002	BP
DIBROMOCHLOROMETHANE	ND	ug/Kg	100	5035/8260	23922	11/11/2002	11/19/2002	BP
1,2-DIBROMO-3-CHLOROPROPANE	ND	ug/Kg	250	5035/8260	23922	11/11/2002	11/19/2002	BP
DIBROMOMETHANE	ND	ug/Kg	100	5035/8260	23922	11/11/2002	11/19/2002	BP
1,2-DICHLOROBENZENE	ND	ug/Kg	100	5035/8260	23922	11/11/2002	11/19/2002	BP
1,3-DICHLOROBENZENE	ND	ug/Kg	100	5035/8260	23922	11/11/2002	11/19/2002	BP

1914 Holloway Drive Holt, Michigan 48842 Telephone: (517) 699-0345 Facsimile: (517) 699-0388
7794 Boardwalk Road Brighton, Michigan 48116 Telephone: (248) 446-5700 Facsimile: (248) 446-5701

Fibertec
environmental
services

ANALYTICAL LABORATORY RESULTS

CLIENT IDENTIFICATION:	ARCADIS G & M	SAMPLE MATRIX:	SOIL
FIBERTEC PROJECT NO:	71047	FIBERTEC SAMPLE NUMBER:	003

CLIENT SAMPLE INFORMATION

PROJECT IDENTIFICATION:	WOLVERINE GASKET INKSTER, MI	CLIENT SAMPLE DESCRIPTION:	MW-9 7'-8'
PROJECT NUMBER:	MI000745.0005.00002	CLIENT SAMPLE NUMBER:	3
SAMPLE DATE:	11/11/2002	CHAIN OF CUSTODY NUMBER:	24165

COMMENTS: ALL RESULTS REPORTED ON AN AS RECEIVED, WET WEIGHT BASIS
* RAISED RL DUE TO SAMPLE MATRIX

DEFINITIONS: ND = NOT DETECTED AT OR ABOVE REPORTING LIMIT; RL = REPORTING LIMIT
N/A = NOT AVAILABLE OR NOT APPLICABLE

ANALYTE	RESULT	UNITS	RL	METHOD	BATCH	EXTRACTION DATE	ANALYSIS DATE	TECH. INIT.
1,4-DICHLOROBENZENE	ND	ug/Kg	100	5035/8260	23922	11/11/2002	11/19/2002	BP
DICHLORODIFLUOROMETHANE	ND	ug/Kg	250	5035/8260	23922	11/11/2002	11/19/2002	BP
1,1-DICHLOROETHANE	ND	ug/Kg	50	5035/8260	23922	11/11/2002	11/19/2002	BP
1,2-DICHLOROETHANE	ND	ug/Kg	50	5035/8260	23922	11/11/2002	11/19/2002	BP
CIS-1,2-DICHLOROETHENE	ND	ug/Kg	50	5035/8260	23922	11/11/2002	11/19/2002	BP
TRANS-1,2-DICHLOROETHENE	ND	ug/Kg	50	5035/8260	23922	11/11/2002	11/19/2002	BP
1,1-DICHLOROETHENE	ND	ug/Kg	50	5035/8260	23922	11/11/2002	11/19/2002	BP
1,2-DICHLOROPROPANE	ND	ug/Kg	50	5035/8260	23922	11/11/2002	11/19/2002	BP
1,3-DICHLOROPROPANE	ND	ug/Kg	50	5035/8260	23922	11/11/2002	11/19/2002	BP
2,2-DICHLOROPROPANE	ND	ug/Kg	50	5035/8260	23922	11/11/2002	11/19/2002	BP
1,1-DICHLOROPROPENE	ND	ug/Kg	50	5035/8260	23922	11/11/2002	11/19/2002	BP
CIS-1,3-DICHLOROPROPENE	ND	ug/Kg	50	5035/8260	23922	11/11/2002	11/19/2002	BP
TRANS-1,3-DICHLOROPROPENE	ND	ug/Kg	50	5035/8260	23922	11/11/2002	11/19/2002	BP
ETHYLBENZENE	1,400	ug/Kg	50	5035/8260	23922	11/11/2002	11/19/2002	BP
ETHYLENE DIBROMIDE	ND	ug/Kg	50	5035/8260	23922	11/11/2002	11/19/2002	BP
HEXACHLOROBUTADIENE	ND	ug/Kg	50	5035/8260	23922	11/11/2002	11/19/2002	BP
2-HEXANONE	ND	ug/Kg	2,500	5035/8260	23922	11/11/2002	11/19/2002	BP
IODOMETHANE	ND	ug/Kg	100	5035/8260	23922	11/11/2002	11/19/2002	BP
ISOPROPYLBENZENE	340	ug/Kg	250	5035/8260	23922	11/11/2002	11/19/2002	BP
4-METHYL-2-PENTANONE	ND	ug/Kg	2,500	5035/8260	23922	11/11/2002	11/19/2002	BP
METHYLENE CHLORIDE	ND	ug/Kg	250	5035/8260	23922	11/11/2002	11/19/2002	BP
2-METHYLNAPHTHALENE	ND	ug/Kg	250	5035/8260	23922	11/11/2002	11/19/2002	BP
MTBE	ND	ug/Kg	250	5035/8260	23922	11/11/2002	11/19/2002	BP
NAPHTHALENE	ND	ug/Kg	250	5035/8260	23922	11/11/2002	11/19/2002	BP
N-PROPYLBENZENE	110	ug/Kg	100	5035/8260	23922	11/11/2002	11/19/2002	BP

1914 Holloway Drive Holt, Michigan 48842 Telephone: (517) 699-0345 Facsimile: (517) 699-0388
7794 Boardwalk Road Brighton, Michigan 48116 Telephone: (248) 446-5700 Facsimile: (248) 446-5701

Fibertec
environmental
services

ANALYTICAL LABORATORY RESULTS

CLIENT IDENTIFICATION:	ARCADIS G & M	SAMPLE MATRIX:	**SOIL**
FIBERTEC PROJECT NO:	71047	FIBERTEC SAMPLE NUMBER:	**003**

CLIENT SAMPLE INFORMATION

PROJECT IDENTIFICATION:	WOLVERINE GASKET INKSTER, MI	CLIENT SAMPLE DESCRIPTION:	**MW-9 7'-8'**
PROJECT NUMBER:	MI000745.0005.00002	CLIENT SAMPLE NUMBER:	**3**
SAMPLE DATE:	11/11/2002	CHAIN OF CUSTODY NUMBER:	**24165**

COMMENTS: ALL RESULTS REPORTED ON AN AS RECEIVED, WET WEIGHT BASIS
* RAISED RL DUE TO SAMPLE MATRIX

DEFINITIONS: ND = NOT DETECTED AT OR ABOVE REPORTING LIMIT; RL = REPORTING LIMIT
N/A = NOT AVAILABLE OR NOT APPLICABLE

ANALYTE	RESULT	UNITS	RL	METHOD	BATCH	EXTRACTION DATE	ANALYSIS DATE	TECH. INIT.
SEC-BUTYLBENZENE	ND	ug/Kg	50	5035/8260	23922	11/11/2002	11/19/2002	BP
STYRENE	ND	ug/Kg	50	5035/8260	23922	11/11/2002	11/19/2002	BP
TERT-BUTYLBENZENE	ND	ug/Kg	50	5035/8260	23922	11/11/2002	11/19/2002	BP
1,1,1,2-TETRACHLOROETHANE	ND	ug/Kg	100	5035/8260	23922	11/11/2002	11/19/2002	BP
1,1,2,2-TETRACHLOROETHANE	ND	ug/Kg	100	5035/8260	23922	11/11/2002	11/19/2002	BP
TETRACHLOROETHENE	ND	ug/Kg	50	5035/8260	23922	11/11/2002	11/19/2002	BP
TOLUENE	ND	ug/Kg	50	5035/8260	23922	11/11/2002	11/19/2002	BP
1,2,3-TRICHLOROBENZENE	ND	ug/Kg	250	5035/8260	23922	11/11/2002	11/19/2002	BP
1,2,4-TRICHLOROBENZENE	ND	ug/Kg	250	5035/8260	23922	11/11/2002	11/19/2002	BP
1,1,1-TRICHLOROETHANE	ND	ug/Kg	50	5035/8260	23922	11/11/2002	11/19/2002	BP
1,1,2-TRICHLOROETHANE	ND	ug/Kg	50	5035/8260	23922	11/11/2002	11/19/2002	BP
TRICHLOROETHENE	ND	ug/Kg	50	5035/8260	23922	11/11/2002	11/19/2002	BP
TRICHLOROFLUOROMETHANE	ND	ug/Kg	100	5035/8260	23922	11/11/2002	11/19/2002	BP
1,2,3-TRICHLOROPROPANE	ND	ug/Kg	100	5035/8260	23922	11/11/2002	11/19/2002	BP
1,2,4-TRIMETHYLBENZENE	ND	ug/Kg	100	5035/8260	23922	11/11/2002	11/19/2002	BP
1,3,5-TRIMETHYLBENZENE	ND	ug/Kg	100	5035/8260	23922	11/11/2002	11/19/2002	BP
VINYL ACETATE	ND	ug/Kg	2,500	5035/8260	23922	11/11/2002	11/19/2002	BP
VINYL CHLORIDE	ND	ug/Kg	100	5035/8260	23922	11/11/2002	11/19/2002	BP
TOTAL XYLENES	ND	ug/Kg	150	5035/8260	23922	11/11/2002	11/19/2002	BP

1914 Holloway Drive Holt, Michigan 48842 Telephone: (517) 699-0345 Facsimile: (517) 699-0388
7794 Boardwalk Road Brighton, Michigan 48116 Telephone: (248) 446-5700 Facsimile: (248) 446-5701

Fibertec
environmental
services

ANALYTICAL LABORATORY RESULTS

CLIENT IDENTIFICATION:	ARCADIS G & M	SAMPLE MATRIX:	SOIL
FIBERTEC PROJECT NO:	71047	FIBERTEC SAMPLE NUMBER:	001

CLIENT SAMPLE INFORMATION

PROJECT IDENTIFICATION:	WOLVERINE GASKET INKSTER, MI	CLIENT SAMPLE DESCRIPTION:	MW-8 7'-8'
PROJECT NUMBER:	MI000745.0005.00002	CLIENT SAMPLE NUMBER:	1
SAMPLE DATE:	11/11/2002	CHAIN OF CUSTODY NUMBER:	24165

COMMENTS: ALL RESULTS REPORTED ON AN AS RECEIVED, WET WEIGHT BASIS

DEFINITIONS: ND = NOT DETECTED AT OR ABOVE REPORTING LIMIT; RL = REPORTING LIMIT
N/A = NOT AVAILABLE OR NOT APPLICABLE

ANALYTE	RESULT	UNITS	RL	METHOD	BATCH	EXTRACTION DATE	ANALYSIS DATE	TECH. INIT.
ACETONE	ND	ug/Kg	750	5035/8260	23922	11/11/2002	11/19/2002	BP
ACROLEIN	ND	ug/Kg	50	5035/8260	23922	11/11/2002	11/19/2002	BP
ACRYLONITRILE	ND	ug/Kg	2,500	5035/8260	23922	11/11/2002	11/19/2002	BP
BENZENE	ND	ug/Kg	50	5035/8260	23922	11/11/2002	11/19/2002	BP
BROMOBENZENE	ND	ug/Kg	100	5035/8260	23922	11/11/2002	11/19/2002	BP
BROMOCHLOROMETHANE	ND	ug/Kg	100	5035/8260	23922	11/11/2002	11/19/2002	BP
BROMODICHLOROMETHANE	ND	ug/Kg	100	5035/8260	23922	11/11/2002	11/19/2002	BP
BROMOFORM	ND	ug/Kg	100	5035/8260	23922	11/11/2002	11/19/2002	BP
BROMOMETHANE	ND	ug/Kg	250	5035/8260	23922	11/11/2002	11/19/2002	BP
2-BUTANONE	ND	ug/Kg	750	5035/8260	23922	11/11/2002	11/19/2002	BP
N-BUTYLBENZENE	ND	ug/Kg	50	5035/8260	23922	11/11/2002	11/19/2002	BP
CARBON DISULFIDE	ND	ug/Kg	250	5035/8260	23922	11/11/2002	11/19/2002	BP
CARBON TETRACHLORIDE	ND	ug/Kg	50	5035/8260	23922	11/11/2002	11/19/2002	BP
CHLOROBENZENE	3,800	ug/Kg	50	5035/8260	23922	11/11/2002	11/19/2002	BP
CHLOROETHANE	ND	ug/Kg	250	5035/8260	23922	11/11/2002	11/19/2002	BP
2-CHLOROETHYL VINYL ETHER	ND	ug/Kg	5,000	5035/8260	23922	11/11/2002	11/19/2002	BP
CHLOROFORM	ND	ug/Kg	50	5035/8260	23922	11/11/2002	11/19/2002	BP
CHLOROMETHANE	ND	ug/Kg	250	5035/8260	23922	11/11/2002	11/19/2002	BP
2-CHLOROTOLUENE	ND	ug/Kg	50	5035/8260	23922	11/11/2002	11/19/2002	BP
4-CHLOROTOLUENE	ND	ug/Kg	50	5035/8260	23922	11/11/2002	11/19/2002	BP
DIBROMOCHLOROMETHANE	ND	ug/Kg	100	5035/8260	23922	11/11/2002	11/19/2002	BP
1,2-DIBROMO-3-CHLOROPROPANE	ND	ug/Kg	250	5035/8260	23922	11/11/2002	11/19/2002	BP
DIBROMOMETHANE	ND	ug/Kg	100	5035/8260	23922	11/11/2002	11/19/2002	BP
1,2-DICHLOROBENZENE	ND	ug/Kg	100	5035/8260	23922	11/11/2002	11/19/2002	BP
1,3-DICHLOROBENZENE	ND	ug/Kg	100	5035/8260	23922	11/11/2002	11/19/2002	BP

1914 Holloway Drive Holt, Michigan 48842 Telephone: (517) 699-0345 Facsimile: (517) 699-0388
7794 Boardwalk Road Brighton, Michigan 48116 Telephone: (248) 446-5700 Facsimile: (248) 446-5701

Fibertec
environmental
services

ANALYTICAL LABORATORY RESULTS

CLIENT IDENTIFICATION:	ARCADIS G & M	SAMPLE MATRIX:	SOIL
FIBERTEC PROJECT NO:	71047	FIBERTEC SAMPLE NUMBER:	001

CLIENT SAMPLE INFORMATION

PROJECT IDENTIFICATION:	WOLVERINE GASKET INKSTER, MI	CLIENT SAMPLE DESCRIPTION:	MW-8 7'-8'
PROJECT NUMBER:	MI000745.0005.00002	CLIENT SAMPLE NUMBER:	1
SAMPLE DATE:	11/11/2002	CHAIN OF CUSTODY NUMBER:	24165

COMMENTS: ALL RESULTS REPORTED ON AN AS RECEIVED, WET WEIGHT BASIS

DEFINITIONS: ND = NOT DETECTED AT OR ABOVE REPORTING LIMIT; RL = REPORTING LIMIT
N/A = NOT AVAILABLE OR NOT APPLICABLE

ANALYTE	RESULT	UNITS	RL	METHOD	BATCH	EXTRACTION DATE	ANALYSIS DATE	TECH. INIT.
1,4-DICHLOROBENZENE	ND	ug/Kg	100	5035/8260	23922	11/11/2002	11/19/2002	BP
DICHLORODIFLUOROMETHANE	ND	ug/Kg	250	5035/8260	23922	11/11/2002	11/19/2002	BP
1,1-DICHLOROETHANE	91	ug/Kg	50	5035/8260	23922	11/11/2002	11/19/2002	BP
1,2-DICHLOROETHANE	ND	ug/Kg	50	5035/8260	23922	11/11/2002	11/19/2002	BP
CIS-1,2-DICHLOROETHENE	ND	ug/Kg	50	5035/8260	23922	11/11/2002	11/19/2002	BP
TRANS-1,2-DICHLOROETHENE	ND	ug/Kg	50	5035/8260	23922	11/11/2002	11/19/2002	BP
1,1-DICHLOROETHENE	ND	ug/Kg	50	5035/8260	23922	11/11/2002	11/19/2002	BP
1,2-DICHLOROPROPANE	ND	ug/Kg	50	5035/8260	23922	11/11/2002	11/19/2002	BP
1,3-DICHLOROPROPANE	ND	ug/Kg	50	5035/8260	23922	11/11/2002	11/19/2002	BP
2,2-DICHLOROPROPANE	ND	ug/Kg	50	5035/8260	23922	11/11/2002	11/19/2002	BP
1,1-DICHLOROPROPENE	ND	ug/Kg	50	5035/8260	23922	11/11/2002	11/19/2002	BP
CIS-1,3-DICHLOROPROPENE	ND	ug/Kg	50	5035/8260	23922	11/11/2002	11/19/2002	BP
TRANS-1,3-DICHLOROPROPENE	ND	ug/Kg	50	5035/8260	23922	11/11/2002	11/19/2002	BP
ETHYLBENZENE	ND	ug/Kg	50	5035/8260	23922	11/11/2002	11/19/2002	BP
ETHYLENE DIBROMIDE	ND	ug/Kg	50	5035/8260	23922	11/11/2002	11/19/2002	BP
HEXACHLOROBUTADIENE	ND	ug/Kg	50	5035/8260	23922	11/11/2002	11/19/2002	BP
2-HEXANONE	ND	ug/Kg	2,500	5035/8260	23922	11/11/2002	11/19/2002	BP
IODOMETHANE	ND	ug/Kg	100	5035/8260	23922	11/11/2002	11/19/2002	BP
ISOPROPYLBENZENE	ND	ug/Kg	250	5035/8260	23922	11/11/2002	11/19/2002	BP
4-METHYL-2-PENTANONE	ND	ug/Kg	2,500	5035/8260	23922	11/11/2002	11/19/2002	BP
METHYLENE CHLORIDE	ND	ug/Kg	250	5035/8260	23922	11/11/2002	11/19/2002	BP
2-METHYLNAPHTHALENE	ND	ug/Kg	250	5035/8260	23922	11/11/2002	11/19/2002	BP
MTBE	ND	ug/Kg	250	5035/8260	23922	11/11/2002	11/19/2002	BP
NAPHTHALENE	ND	ug/Kg	250	5035/8260	23922	11/11/2002	11/19/2002	BP
N-PROPYLBENZENE	ND	ug/Kg	100	5035/8260	23922	11/11/2002	11/19/2002	BP

1914 Holloway Drive Holt, Michigan 48842 Telephone: (517) 699-0345 Facsimile: (517) 699-0388
7794 Boardwalk Road Brighton, Michigan 48116 Telephone: (248) 446-5700 Facsimile: (248) 446-5701

Fibertec
environmental
services

ANALYTICAL LABORATORY RESULTS

CLIENT IDENTIFICATION:	ARCADIS G & M	SAMPLE MATRIX:	SOIL
FIBERTEC PROJECT NO:	71047	FIBERTEC SAMPLE NUMBER:	001

CLIENT SAMPLE INFORMATION

PROJECT IDENTIFICATION:	WOLVERINE GASKET INKSTER, MI	CLIENT SAMPLE DESCRIPTION:	MW-8 7'-8'
PROJECT NUMBER:	MI000745.0005.00002	CLIENT SAMPLE NUMBER:	1
SAMPLE DATE:	11/11/2002	CHAIN OF CUSTODY NUMBER:	24165

COMMENTS: ALL RESULTS REPORTED ON AN AS RECEIVED, WET WEIGHT BASIS

DEFINITIONS: ND = NOT DETECTED AT OR ABOVE REPORTING LIMIT; RL = REPORTING LIMIT
N/A = NOT AVAILABLE OR NOT APPLICABLE

ANALYTE	RESULT	UNITS	RL	METHOD	BATCH	EXTRACTION DATE	ANALYSIS DATE	TECH. INIT.
SEC-BUTYLBENZENE	ND	ug/Kg	50	5035/8260	23922	11/11/2002	11/19/2002	BP
STYRENE	ND	ug/Kg	50	5035/8260	23922	11/11/2002	11/19/2002	BP
TERT-BUTYLBENZENE	ND	ug/Kg	50	5035/8260	23922	11/11/2002	11/19/2002	BP
1,1,1,2-TETRACHLOROETHANE	ND	ug/Kg	100	5035/8260	23922	11/11/2002	11/19/2002	BP
1,1,2,2-TETRACHLOROETHANE	ND	ug/Kg	100	5035/8260	23922	11/11/2002	11/19/2002	BP
TETRACHLOROETHENE	ND	ug/Kg	50	5035/8260	23922	11/11/2002	11/19/2002	BP
TOLUENE	ND	ug/Kg	50	5035/8260	23922	11/11/2002	11/19/2002	BP
1,2,3-TRICHLOROBENZENE	ND	ug/Kg	250	5035/8260	23922	11/11/2002	11/19/2002	BP
1,2,4-TRICHLOROBENZENE	ND	ug/Kg	250	5035/8260	23922	11/11/2002	11/19/2002	BP
1,1,1-TRICHLOROETHANE	ND	ug/Kg	50	5035/8260	23922	11/11/2002	11/19/2002	BP
1,1,2-TRICHLOROETHANE	ND	ug/Kg	50	5035/8260	23922	11/11/2002	11/19/2002	BP
TRICHLOROETHENE	ND	ug/Kg	50	5035/8260	23922	11/11/2002	11/19/2002	BP
TRICHLOROFLUOROMETHANE	ND	ug/Kg	100	5035/8260	23922	11/11/2002	11/19/2002	BP
1,2,3-TRICHLOROPROPANE	ND	ug/Kg	100	5035/8260	23922	11/11/2002	11/19/2002	BP
1,2,4-TRIMETHYLBENZENE	ND	ug/Kg	100	5035/8260	23922	11/11/2002	11/19/2002	BP
1,3,5-TRIMETHYLBENZENE	ND	ug/Kg	100	5035/8260	23922	11/11/2002	11/19/2002	BP
VINYL ACETATE	ND	ug/Kg	2,500	5035/8260	23922	11/11/2002	11/19/2002	BP
VINYL CHLORIDE	ND	ug/Kg	100	5035/8260	23922	11/11/2002	11/19/2002	BP
TOTAL XYLENES	ND	ug/Kg	150	5035/8260	23922	11/11/2002	11/19/2002	BP

1914 Holloway Drive Holt, Michigan 48842 Telephone: (517) 699-0345 Facsimile: (517) 699-0388
7794 Boardwalk Road Brighton, Michigan 48116 Telephone: (248) 446-5700 Facsimile: (248) 446-5701

Fibertec
environmental
services

November 21, 2002

Fibertec Project # 71047
Project Identification: Wolverine Gasket Inkster, MI/ MI000745.0005.00002

Mr. Kevin Wilson
Arcadis G & M
25200 Telegraph Road
Southfield, MI 48034

Dear Mr. Wilson,

Thank you for selecting Fibertec Environmental Services as your analytical laboratory. The samples you submitted have been analyzed as requested and the results compiled in the enclosed report. Please note samples will be disposed of 30 days after reporting date.

If you have any questions regarding these results or if we may be of further assistance to you, please contact me at (517) 699-0345.

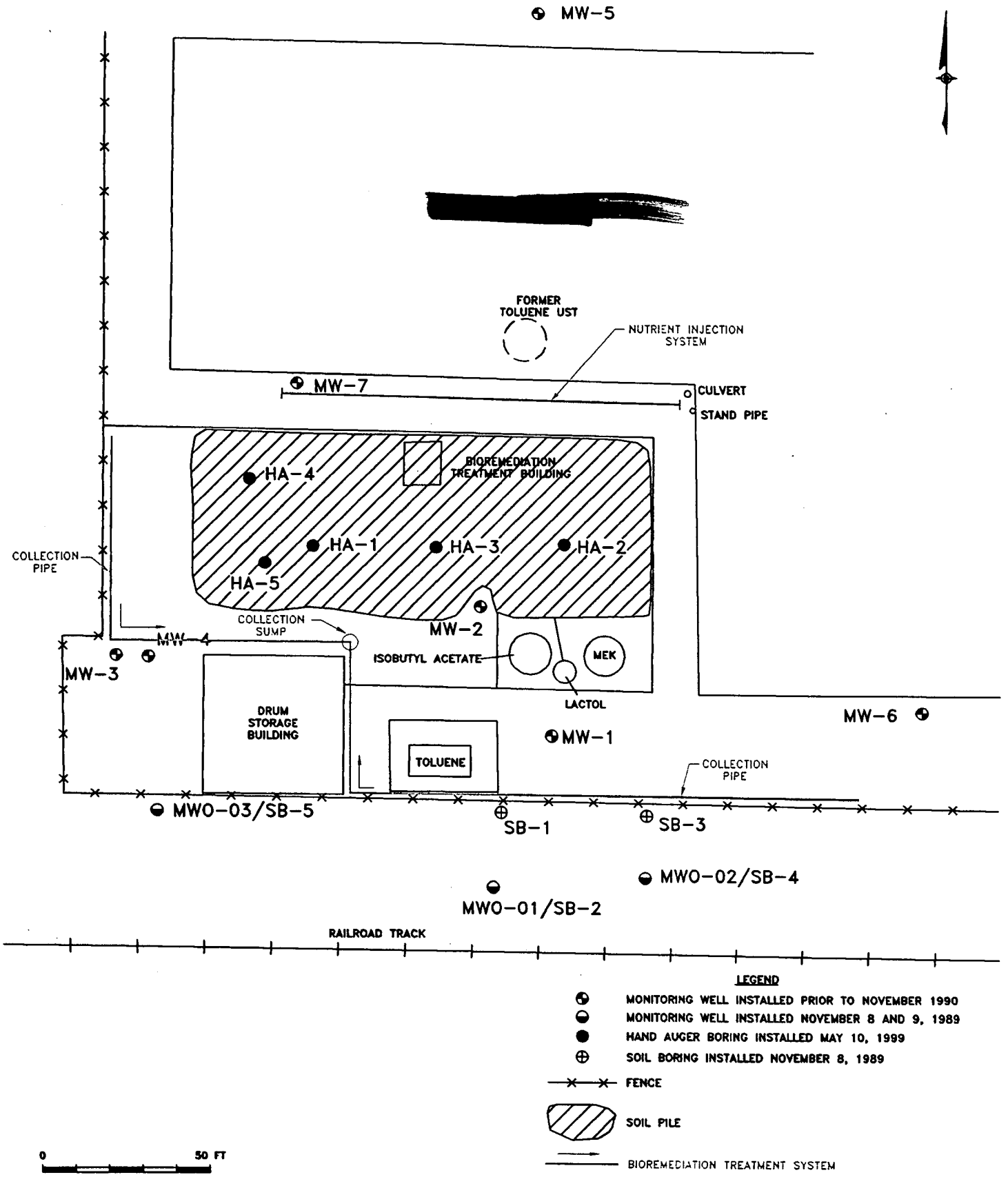
Sincerely,

Daryl P. Strandbergh
Laboratory Director

DPS/kc

Enclosures

1914 Holloway Drive Holt, Michigan 48842 Telephone: (517) 699-0345 Facsimile: (517) 699-0388
7794 Boardwalk Road Brighton, Michigan 48116 Telephone: (248) 446-5700 Facsimile: (248) 466-5701



ARCADIS GERAGHTY&MILLER

6397 Emerald Parkway
Suite 120, Dublin, OH 43016
Tel: 614/764-2300 Fax: 614/764-1270

MONITORING WELL/SOIL BORING LOCATIONS

[redacted]

DATE	PROJECT MANAGER	DRAWING NAME
03JUN99	J. VENN	EAGLE\EAGLE-1
DRAWN	LEAD DESIGN PROF.	CHECKED
R. SMITH		J. VENN
PROJECT NUMBER		FIGURE NUMBER
MI000745.0001		2

MI0012559

Wolverine Gasket Division-Inkster Remediation Proposal

Remediation Options	Trench Replacement	Passive w/ no SVE	Passive w/SVE	Aggressive w/ no SVE	Aggressive w/ SVE	Stockpile Removal
Installation Cost	$36,000	$103,850	$112,900	$110,250	$139,700	$74,000
Annual O & M Cost	$8,400	$28,800	$37,800	$30,000	$39,000	0
Estimated Years of operation	7	5	5	3	3	0
Year 1 Total Cost	$44,400	$112,250	$150,700	$140,250	$178,700	$74,000
Year 2 Total Cost	$52,800	$141,050	$188,500	$170,250	$217,700	0
Year 3 Total Cost	$61,200	$169,850	$217,300	$200,250	$256,700	0
Total Cost of Option	$310,800	$227,450	$274,900	$200,250	$256,700	$74,000
% Budget Uncertainty	(+/-) 20%	(+/-) 20%	(+/-) 20%	(+/-) 20%	(+/-) 20%	(+/-) 15%

MI0012560

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
SOUTHEAST MICHIGAN DISTRICT OFFICE

JENNIFER M. GRANHOLM
GOVERNOR

STEVEN E. CHESTER
DIRECTOR

JAN 31 2003

January 30, 2003

Mr. Doug Rommeck, CHMM
Eagle-Picher Automotive
2638 Princess Street
Inkster, Michigan 48141

Dear Mr. Rommeck:

SUBJECT: Groundwater Investigation and Remediation
Wolverine Gasket Facility
2638 Princess Street, Inkster, Wayne County, Michigan

I have reviewed the January 27, 2003 letter from your environmental consultant, ARCADIS of Southfield, Michigan regarding the proposed investigative and remedial activities at the subject facility. Thank you for providing a prompt submittal of upcoming action items to this office following our January 23, 2003 meeting.

The letter summarizes the action items that Wolverine Gasket will undertake at the site including: enhancing the existing groundwater treatment system, investigating the source of elevated benzene concentrations in groundwater in well MW-9, and assessing the location and orientation of subsurface utilities. It is my understanding that ARCADIS proposes to complete all of the proposed action items by July 31, 2003. I concur with ARCADIS' list of action items and the July 31 deadline for their completion. You are hereby authorized to proceed. Please provide a report documenting the results of each action item to this office by July 31, 2003.

As we discussed last week during our meeting, I will be transferring to the Department of Environmental Quality (DEQ) Cadillac District Office effective Monday, February 3, 2003. At that time, this project will be transferred to another DEQ project manager. I am unaware who that individual will be at this time, so in the event that you have any questions after tomorrow, please contact Mr. Steve Kitler at 734-953-1458.

Sincerely,

James J. Ferritto, Jr., Senior Geologist
Southeast Michigan District Office
Remediation and Redevelopment Division
734-953-1429

cc: Mr. Steven Kitler, DEQ

FACSIMILE TRANSMISSION

WOLVERINE GASKET DIVISION

INKSTER, MICHIGAN

FAX: 313/562-8248

TO: MI DEQ

Date: Thursday, October 31, 2002

ATTN: **Mr. Jim Ferritto**
Fax: 734/953-1544
FROM: Douglas Rommeck

Number of pages including cover: 6

SUBJECT: Wolverine Gasket –Inkster Project

Jim,
Please find the results for the sampling event that occurred on 9/27/02. I have enclosed the groundwater flow map that has been revised from when we met on 9/27/02. If you are available the afternoon of Friday, Nov. 1, I would like to call and review the results and make a determination on the 3rd monitoring well that may be installed on 11/11/02. If you need to immediately contact me, I can be reached at 517/439-0547.

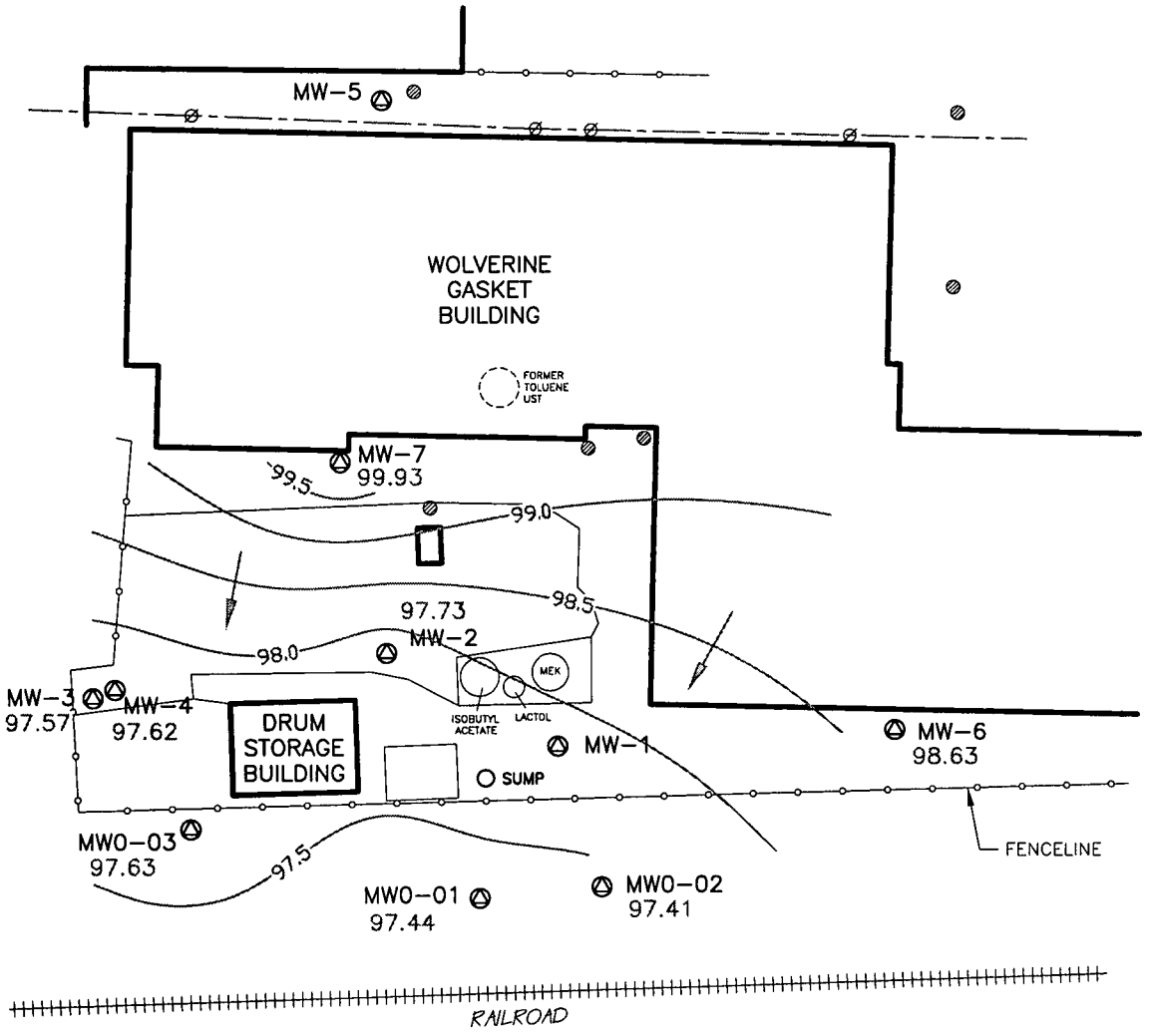
Table 1. Summary of Groundwater-Elevation Data, Eagle-Picher Automotive Group, Wolverine Gasket Division, Inkster, Michigan.

Well Designation		Well TOC Elevation (ft)	Total Depth (ft BTOC)	Depth to Water (ft BTOC)	Groundwater Elevation (ft)
MW-6	5/11/1999	101.34	3.61	1.21	100.13
	2/2/2000			2.24	99.10
	7/27/2000			2.75	98.59
	11/13/2000			0.36	100.98
	5/22/2001			1.36	99.98
	1/14/2002			1.34	100.00
	9/27/2002			2.71	98.63
MW-7	5/11/1999	100.53	5.80	1.67	98.86
	2/2/2000			2.29	98.24
	7/27/2000			2.19	98.34
	11/13/2000			1.05	99.48
	5/22/2001			0.87	99.66
	1/14/2002			1.53	99.00
	9/27/2002			0.60	99.93
MWO-1	5/11/1999	104.15	8.71	3.61	100.54
	2/2/2000			4.61	99.54
	7/27/2000			5.34	98.81
	11/13/2000			3.68	100.47
	5/22/2001			3.66	100.49
	1/14/2002			3.05	101.10
	9/27/2002			6.71	97.44
MWO-2	5/11/1999	103.52	8.75	3.05	100.47
	2/2/2000			4.02	99.50
	7/27/2000			4.75	98.77
	11/13/2000			3.11	100.41
	5/22/2001			3.10	100.42
	1/14/2002			3.62	99.90
	9/27/2002			6.11	97.41
MWO-3	5/11/1999	103.97	8.78	3.49	100.48
	2/2/2000			4.43	99.54
	7/27/2000			5.21	98.76
	11/13/2000			3.46	100.51
	5/22/2001			3.22	100.75
	1/14/2002			3.32	100.65
	9/27/2002			6.34	97.63

Notes:

-- Water level was not measured.
ft BTOC Feet below top of casing.
TOC Top of casing, based on relative datum of 100.0 feet established at Wolverine Gasket Plant.

g:\common\eagle picher\3rdqtr02\table 1-gw elev



LEGEND

⊘	MANHOLE
⊘	MONITORING WELL
97.57	GROUNDWATER ELEVATION
— 98.0 —	GROUNDWATER–ELEVATION CONTOUR
→	GROUNDWATER–FLOW DIRECTION

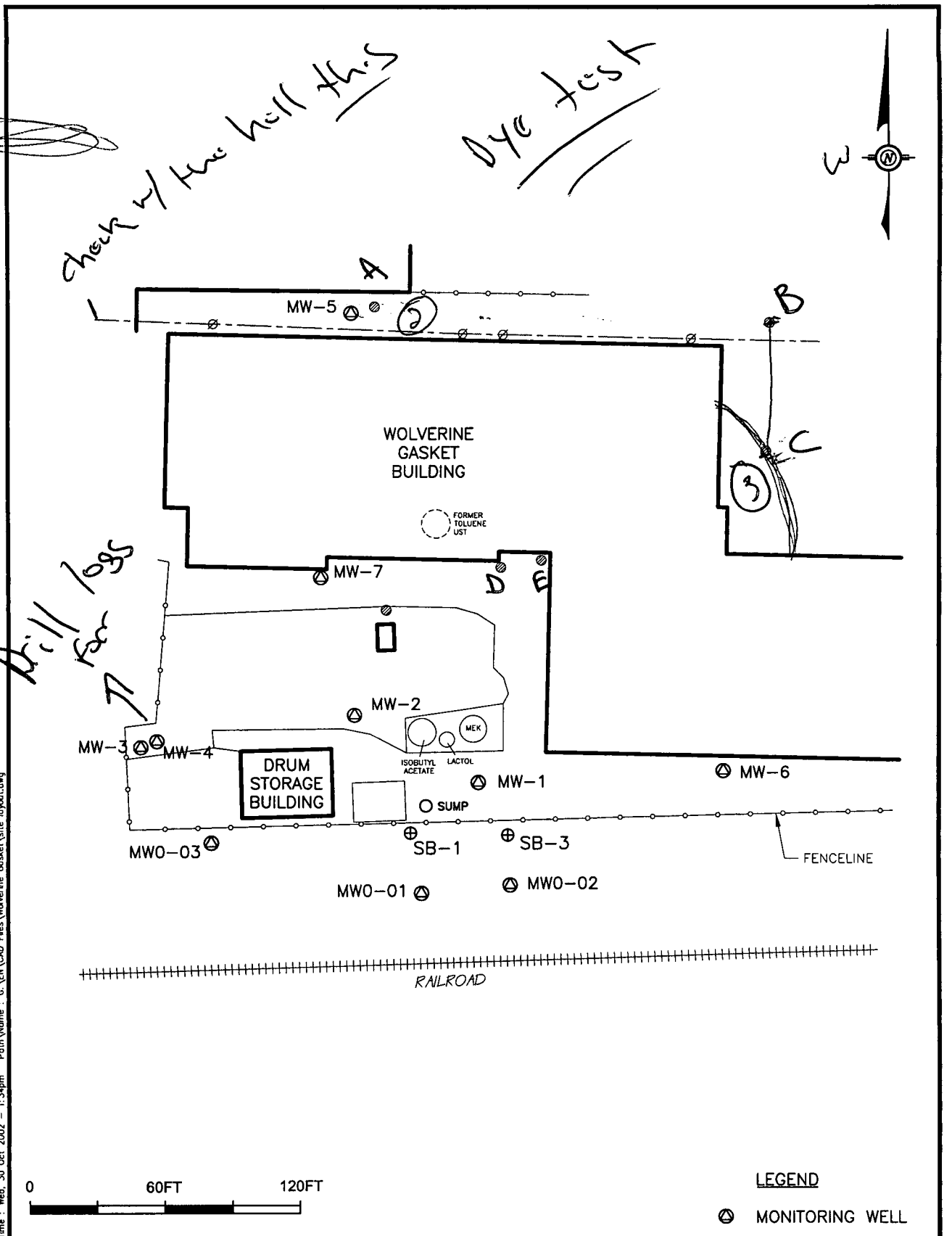
0 60FT 120FT

ARCADIS
25200 TELEGRAPH ROAD
SOUTHFIELD, MICHIGAN 48034
TEL: 248.936.8000
FAX: 248.936.8111

PERCHED GROUNDWATER
ELEVATION SEPTEMBER 27, 2002
EAGLE-PICHER AUTOMOTIVE GROUP
WOLVERINE GASKET DIVISION
INKSTER, MICHIGAN

DATE	PROJECT MANAGER	DRAWING NAME
23-OCT-02	J. QUINNAN	site layout
DRAWN	LEAD DESIGN PROF.	CHECKED
TRY		K. WILSON
PROJECT NUMBER		FIGURE NUMBER
MI000745.0003		3

User Name : TYarbrough Date\Time : Wed, 30 Oct 2002 - 1:35pm Path\Name : G:\EN\CAD Files\Wolverine Gasket\site layout.dwg



User Name : TYarbrough Date\Time : Wed, 30 Oct 2002 – 1:34pm Path\Name : G:\EN\CAD Files\Wolverine Gasket\site layout.dwg

ARCADIS
25200 TELEGRAPH ROAD
SOUTHFIELD, MICHIGAN 48034
TEL: 248.936.8000
FAX: 248.936.8111

SITE LAYOUT MAP
EAGLE-PICHER
AUTOMOTIVE GROUP
WOLVERINE GASKET DIVISION
INKSTER, MICHIGAN

DATE	PROJECT MANAGER	DRAWING NAME
23-SEP-02	J. QUINNAN	site layout
DRAWN	LEAD DESIGN PROF.	CHECKED
TRY		K. WILSON
PROJECT NUMBER		FIGURE NUMBER
MI000745.0003		2

ARCADIS

ARCADIS G&M of Michigan, LLC
25200 Telegraph Road
Southfield
Michigan 48034
Tel 248 936 8000
Fax 248 936 8111

MEMO

To:
Mr. Doug Rommeck
Wolverine Gasket
2638 Princess Street
Inkster, Michigan 48141

Copies:
Kevin Wilson - ARCADIS

From:
Joe Quinnan

Date:
24 October 2003

ARCADIS Project No.:
MI00745

Subject:
Engineering Cost Estimate – Groundwater Remediation Using Injection Wells And Existing Recovery Trench, Wolverine Gasket, Inkster, Michigan

Preliminary Design

Pursuant to your request, ARCADIS has prepared an engineering cost estimate to design & install a groundwater remediation system at Wolverine Gasket's Inkster, Michigan facility (site). The injection well design approach was developed to minimize waste disposal costs (soil and groundwater) associated with the trench-based design provided earlier this year. The injection well design affords Wolverine Gasket greater flexibility in operation, while still providing the capability to remediate the groundwater impacts at the site.

The key features and assumptions used in developing the preliminary the injection well design and engineering cost estimate are summarized below:

- The remedial system will rely on the existing groundwater recovery trench to maintain hydraulic control of the plume during injection operations. An air-stripper will be added to the system to treat recovered groundwater and add oxygen to the water prior to re-injection within the plume. Hydrogen peroxide may also be used to boost the dissolved oxygen concentrations and enhance the performance of the system. As with the trench-based design, the stripper will be sized to allow expansion of the system if additional treatment is required.
- The preliminary design will utilize 60 injection wells to provide oxygenated groundwater within the on-site plume. The injection wells will be installed on 15-foot spacing in a hexagonal pattern between the building and the recovery trench. The injection wells will be operated in two to four zones that will be cycled periodically to distribute oxygenated water throughout the plume.

- The treatment system (air stripper, pumps, distribution manifold, and controls) will be housed in the existing storage building. Existing peroxide equipment will be used, if possible, to minimize cost. However, this engineering cost estimate does assume that the equipment will be replaced.
- The design of the treatment system will be completed after completing a limited number of confirmatory soil borings to establish the aquifer thickness. The design of the system controls is limited to mechanical control of the recovery trench pump(s), air stripper, chemical metering pump, and injection pump. It is assumed that the different injection zone configurations will be achieved through manual connections at the individual injection well wellheads.
- The system is designed for seasonal operation only. All distribution lines will be run across the ground surface to the treatment unit within the storage building.
- ARCADIS' cost estimate includes initial start-up of the system and monthly operations and maintenance (O&M) from April through November. O&M includes two non-routine visits per year.

ARCADIS has also included an engineering cost estimate to enhance the natural degradation of the surface soils within the footprint of the treatment area, if Wolverine Gasket decides not to dispose of these materials. The recommended approach would involve an initial effort to remove debris from the pile, followed by tilling and planting. This approach will aerate the soils and increase the porosity, enhancing the aerobic degradation of the VOCs.

Cost-Estimate

The engineering cost estimate to perform the scope of services summarized above is as follows:

System Installation	Probable Cost	Contingency	
Engineering and Design	$10,000	$2,000	20%
Geoprobe	$2,500	$375	15%
Injection Well Installation	$29,000	$4,350	15%
Existing System Decommissioning	$4,500	$900	20%
System Installation	$36,600	$5,490	15%
Subtotal	**$82,600**	**$13,115**	**16%**

Need to get waste figure

185.00

Hydrogen peroxide

Start-Up and O&M	Probable Cost	Contingency	
System Start-Up	$6,200	$930	15%
Monthly O&M 3 month	$13,400	$2,000	15%
Subtotal	**$19,600**	**$2,930**	**15%**

Enhanced Soil Pile Treatment	Probable Cost	Contingency	
Initial Grubbing	$2,200	$440	20%
Annual Tilling (2x per year)	$3,250	$650	20%
Subtotal	**$5,450**	**$1,090**	**20%**

Based on the engineering cost estimates above, ARCADIS estimates that initial costs for implementation and O&M in 2004 (April through November) will likely range between approximately $102,000 and $117,000. If the enhanced soil pile treatment is implemented, the likely costs for 2004 would range between $5,500 and $6,500.

ARCADIS anticipates that the groundwater treatment will require approximately 3 to 5 years to meet industrial closure standards, depending on whether the soil pile is disposed of during the first year or treated on-site. Based on these assumptions, the likely cost to complete the remediation of the groundwater plume will range between approximately $160,000 and $214,000. This is considerably less than the aggressive trench system (w/ no soil treatment), which ranged from approximately $198,000 to $255,000 for the same duration of treatment. In addition, this remedial strategy will eliminate waste disposal (non-hazardous) costs on the order of $25,000 to $40,000 that would be incurred under the trench-based design.

ARCADIS

ARCADIS G&M of Michigan, LLC
25200 Telegraph Road
Southfield
Michigan 48034
Tel 248 936 8000
Fax 248 936 8111

MEMO

Subject:
Wolverine Gasket Remediation Meeting
Agenda

Date:
August 8, 2003

- Cost

From:
Kevin Wilson

Drafted by:
KRW

Department:
Environmental

ARCADIS Project No.:
MI000745

To:
Doug Rommeck – Wolverine Gasket
Joe Quinnan – ARCADIS

Copies:

Topics of Discussion

- Tentative schedule for project implementation
- Means of cost control
- Other site issues

Schedule

Design of trench – 3 to 4 weeks
(by September 5)
Solicitation of Bids – 2 to 3 weeks
(by September 26)
Installation – 1 week
(by October 10)

Other Issues

Future plans for remedial system upgrade
FOIA information
Utility assessment
Off-site impact

Cost Control

Contracting
Bid spec/ design detail

ARCADIS

Infrastructure, buildings, environment, communications

ARCADIS G&M of Michigan, LLC
25200 Telegraph Road
Southfield
Michigan 48034
Tel 248 936 8000
Fax 248 936 8111
www.arcadis-us.com

Mr. James Ferrito, C.P.G.
Michigan Department of Environmental Quality
38980 Seven Mile Road
Livonia, Michigan 48152-1006

ENVIRONMENTAL

Subject:
January 23, 2003 Site Strategy Meeting for the Wolverine Gasket Site Located in Inkster, Michigan.

Date:
January 27, 2003

Contact:
Kevin Wilson

Phone:
8708

Email:
kwilson@arcadis-us.com

Our ref:
MI000745.0005

Dear Mr. Ferrito:

Thank you for taking the time to meet with Wolverine Gasket and ARCADIS to discuss the redesign plans for the groundwater treatment system; the results of the November 11, 2002 site investigation; and the overall site strategy. The following pages summarize the results of our discussions and identify action items and the schedule that will be implemented as Wolverine Gasket moves toward industrial closure at the site.

Groundwater Treatment System

As presented in the Remedial Action Plan, the objective of the remedial method is to enhance the biodegradation of the hydrocarbon mass in the perched aquifer by adding oxygen to the aquifer. The current groundwater treatment system was designed to accomplish this by adding oxygen in the form of hydrogen peroxide to the perched aquifer. Wolverine Gasket is planning to upgrade the system by adding an air stripper to the treatment process and rehabilitating or replacing the groundwater injection trench. Wolverine Gasket is also planning to apply for an industrial wastewater discharge permit to discharge a portion of the treated water to the sanitary sewer. These changes should enhance the groundwater remediation performance at the site. The air stripper will treat the extracted groundwater, providing treated water saturated with oxygen that can be injected into the perched aquifer. Replacement or rehabilitation of the groundwater infiltration trench is necessary to deliver the oxygen-enriched water to the perched aquifer. Discharging a portion of the treated water to the sanitary sewer will allow the groundwater treatment system to better achieve hydraulic control.

The redesign of the system and installation of the new components are expected to require approximately six months. Therefore, assuming that both the industrial

MI0012570

wastewater discharge permit and the air discharge permit can be obtained within that time frame, the enhanced groundwater treatment system should be operational by July 31, 2003. Additional information regarding the enhanced design of the groundwater treatment system, including expected system performance, redesign details, and a performance monitoring schedule, will be provided to the Michigan Department of Environmental Quality at a future date.

Investigation Results

The November 11, 2002 site investigation identified a substantial benzene concentration in the westernmost monitoring well (Monitoring Well MW-9). This benzene concentration is approximately three times greater than any previously identified benzene concentration at the site. We believe this indicates a different benzene source, which may be located off the Wolverine Gasket property. To further investigate this possibility, Wolverine Gasket intends to submit a request through the Freedom of Information Act (FOIA) to collect information on the presence of contamination on adjacent properties. In addition to submitting the FOIA request, Wolverine Gasket intends to resample the monitoring well during the next groundwater monitoring event. Based on the results of the FOIA and the groundwater monitoring Wolverine Gasket will evaluate the need to conduct further investigative activities to the west of the Wolverine Gasket property boundary.

The FOIA request will be submitted followed by review of any documentation that may be obtained. This review should be completed within six months of obtaining the site data.

Utility Assessment

Wolverine Gasket intends to review existing site information and determine a strategy for locating the pathway of the existing storm-water management system. This strategy could involve dye tracing, video logging, or radio frequency tracing. These activities will be completed in conjunction with the investigation of offsite sources.

Wolverine Gasket intends to undertake the above activities focusing on the system upgrade as a separate issue from the investigation results. Wolverine Gasket expects that the site will be closed using a limited industrial closure strategy.

If you have any questions or comments with regard to this letter, please contact Doug Rommeck at (313) 724-2006.

Sincerely,

ARCADIS G&M of Michigan, LLC.

Kevin R. Wilson
Geologist

Joseph A. Quinnan, P.E./P.G.
Principal Engineer

Robert A. Ferree, C.P.G.
Vice President

Copies:
Douglas Rommeck, C.H.M.M. – Wolverine Gasket

ARCADIS

Infrastructure, buildings, environment, communications

JUL 17 2003

July 10, 2003
Project No: MI000745.0005
Invoice No: 0049645

WOLVERINE GASKET
ATTN: DOUGLAS ROMMECK
ENVIRONMENTAL COORDINATOR
2638 PRINCESS STREET
INKSTER MI 48141

REMEDIATION SYSTEM REPAIR

Professional Services: May 24, 2003 through June 27, 2003

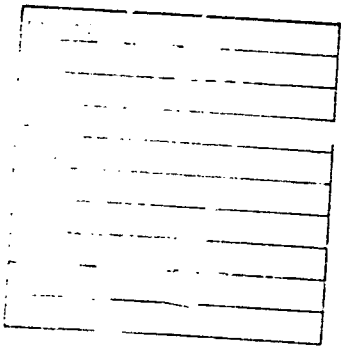
Task: 00001 EAGLEPICH/REMEDIATION SYSTEM REPAIR

Professional Personnel

	Hours	Rate	Amount	
PROJECT STAFF I				
WILSON, KEVIN	2.50	90.00	225.00	
CLERICAL/WRD PRO				
CAMPBELL, JULIE	0.10	44.00	4.40	
Totals	2.60		229.40	
Total Labor				**229.40**

Total this task **$229.40**

Total this invoice **$229.40**



Part of a bigger picture

Bank: Wells Fargo Bank West, NA
Bank routing (ABA) number: 102000076
Account number: 1018164751
Account name: ARCADIS G&M, Inc Lockbox Account

Please Remit To: ARCADIS G&M, Inc
Dept. 547, Denver, Colorado 80291-0547, 720 344 3500
TERMS: Net 30 days

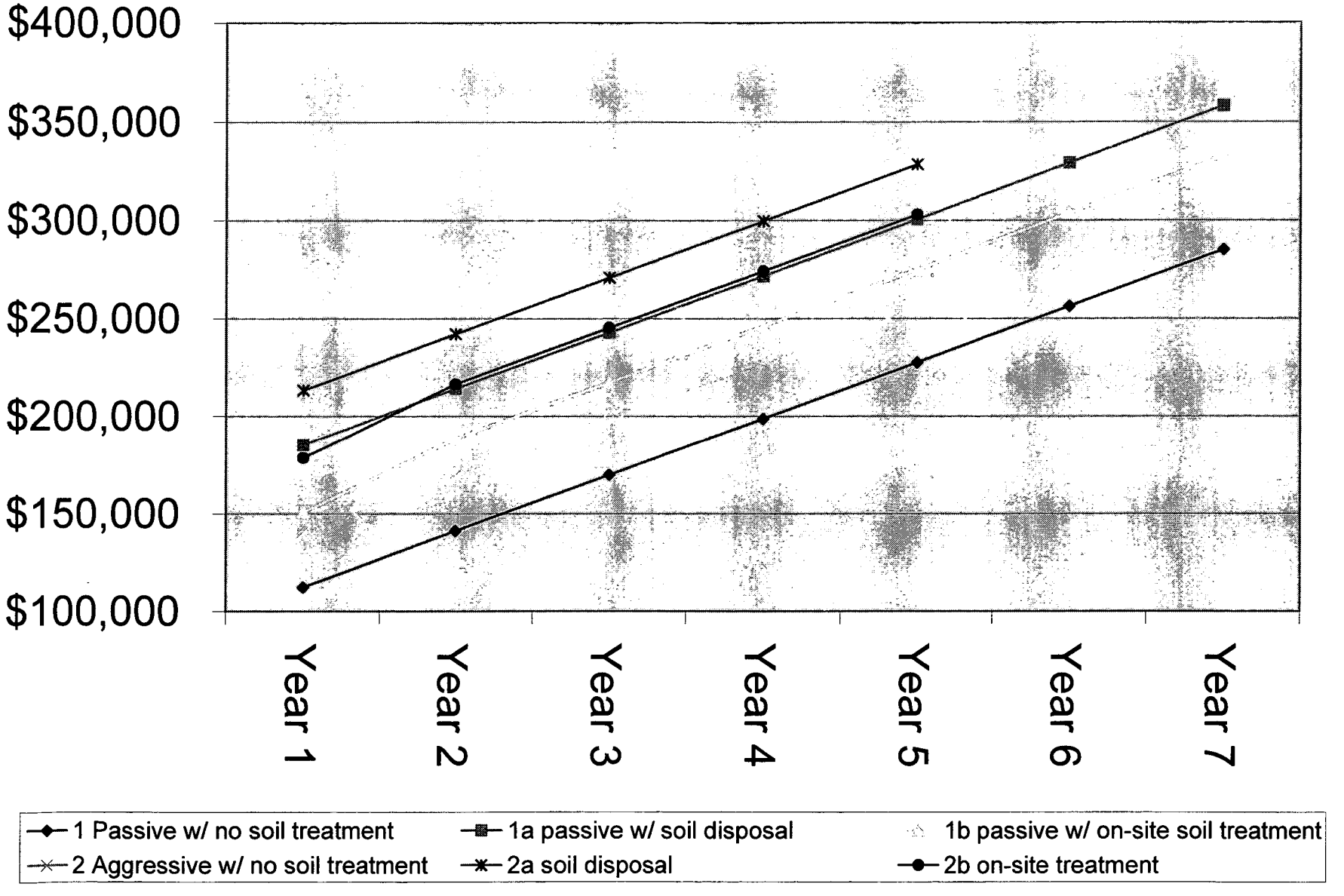
MI0012573

Upgrade to Trench to Passive

Wolverine Gasket Division-Inkster Remediation Proposal

Remediation Options	Trench Replacement	Passive w/ no SVE	Passive w/SVE	Aggressive w/ no SVE	Aggressive w/ SVE	Stockpile Removal
Installation Cost	$36,000	$103,850	$112,900	$110,250	$139,700	$74,000
Annual O & M Cost	$8,400	$28,800	$37,800	$30,000	$39,000	0
Estimated Years of operation	7	5	5	3	3	0
Year 1 Total Cost	$44,400	$112,250	$150,700	$140,250	$178,700	$74,000
Year 2 Total Cost	$52,800	$141,050	$188,500	$170,250	$217,700	0
Year 3 Total Cost	$61,200	$169,850	$217,300	$200,250	$256,700	0
Total Cost of Option	$310,800	$227,450	$274,900	$200,250	$256,700	$74,000
% Budget Uncertainty	(+/-) 20%	(+/-) 20%	(+/-) 20%	(+/-) 20%	(+/-) 20%	(+/-) 15%

MI0012574


$400,000
$350,000
$300,000
$250,000
$200,000
$150,000
$100,000
Year 1
Year 2
Year 3
Year 4
Year 5
Year 6
Year 7
1 Passive w/ no soil treatment
1a passive w/ soil disposal
1b passive w/ on-site soil treatment
2 Aggressive w/ no soil treatment
2a soil disposal
2b on-site treatment

MI0012575

Wolverine Gasket Division-Inkster Remediation Option Summary

Trench Replacement **Secondary Recommendation**

Optimize existing remediation system. Replace existing infiltration trench to accommodate volume of water with out allowing surface exposure. System would be engineered and installed to allow for future expansion or upgrade to additional remediation options. Injection of nutrients and oxygen would be engineered to achieve optimal conditions. This option would meet minimal MI DEQ requirements of having the system running with a written operating procedure.

Passive w/no Soil Vapor Extraction (SVE) **Primary Recommendation**

Replace existing infiltration trench. Upgrade remediation system to include sanitary sewer discharge, air stripper and carbon unit. This option will obtain hydraulic control of groundwater and produce a "cleaner" infiltration stream back into the project. Reengineering the infiltration point to enhance biodegradation of the constituents of concern.

Passive w/ SVE

Identical to the above summary with an additional SVE unit constructed to enhance remediation of the soil overburden area on-site.

Aggressive w/ no SVE

Redesign the system to make the project a "closed loop" pump and treat/bioremediation unit. Infiltration trench would be enclosed with the withdraw piping along the perimeter. Water would be drawn from all four sides of the property, treating and injected back into the center of the property. This would cut in half the draw time and increase oxygen content throughout the property. Increasing oxygen, enhancing the breakdown of the constituents of concern.

Aggressive w/ SVE

Identical to the above summary with an additional SVE unit constructed to enhance remediation of the soil overburden area on-site.

ARCADIS

Infrastructure, buildings, environment, communications

ARCADIS G&M, Inc.
25200 Telegraph Road
Southfield
Michigan 48034
Tel 248 936 8000
Fax 248 936 8111

ENVIRONMENTAL

Douglas Rommeck, CHMM
Eagle-Picher Automotive
Wolverine Gasket Division
2638 Princess Street
Inkster, Michigan 48141

Subject:
Cost Estimate for Remedial System Evaluation and Repair at the Wolverine Gasket Facility.
ARCADIS Project No. MI000745.0005

Detroit Division
5 September 2002

Contact:
Kevin R. Wilson

Extension:
8708

Dear Mr. Rommeck:

ARCADIS is pleased to provide you with this cost estimate to conduct an evaluation and repair of the remediation system at the Wolverine Gasket facility located at 2638 Princess Street in Inkster, Michigan.

Scope of Work

ARCADIS is prepared to conduct the following activities:

- Evaluate the current condition of the groundwater treatment system and make recommendations for repair of the system.
- Replace the pump on the remedial system to return it to operational status.
- Hire a licensed surveyor to survey the existing monitoring wells and storm sewer invert elevations to a site benchmark.
- Collect a full round of water levels and prepare a new groundwater flow map.
- Review the historical data and prepare both groundwater and soil impact maps.
- Prepare a radius of influence map during operation of the groundwater treatment system.
- Conduct a round of groundwater sampling using the low flow sampling technique.
- Attend 2 meetings with Wolverine Gasket and 1 meeting with the Michigan Department of Environmental Quality to discuss the remedial options for the site.

Fees

The groundwater sampling of the site will be conducted for the lump sum cost of $2,000. The remainder of the tasks will be conducted on a time and materials basis according to the Fee Schedule provided in the April 26, 1999 Services Agreement. The costs associated with the time and materials tasks are estimated to be $8,000.

ARCADIS

Douglas Rommeck,
CHMM
September 5, 2002

ARCADIS appreciates the opportunity to be of service to Wolverine Gasket in this matter, if you have any questions or concerns regarding this cost estimate please contact either of the undersigned at (248) 936-8000.

Sincerely,

ARCADIS G&M, Inc.

Kevin R. Wilson
Staff Geologist

Robert A. Ferree, CPG
Vice President

ARCADIS

Infrastructure, buildings, environment, communications

ARCADIS G&M, Inc.
25200 Telegraph Road
Southfield
Michigan 48034
Tel 248 936 8444
Fax 248 936 8445

TELEFAX

ENVIRONMENTAL

To:
Doug Rommeck
Hillsdale Tool

Copies:
Copies

Fax:
(517) 439-5953

Total pages:
3

Date:
5 September 2002

Subject:
Cost Estimate for Wolverine Gasket Site

ARCADIS G&M Project No.:
MI000745.0005

From:
Kevin R. Wilson

Extension:
8708

If you do not receive all pages, please call to let us know as soon as possible.

Doug,

I have attached the cost estimate you requested. I have also checked on the schedule for Tuesday the 17th. It appears as though both Joe and Mark will be available in the afternoon, but not in the morning. So I would suggest showing up around 2 or 3 pm whichever works best for you.

Sincerely,

THIS MESSAGE IS INTENDED ONLY FOR THE USE OF THE INDIVIDUAL OR ENTITY TO WHICH IT IS ADDRESSED AND MAY CONTAIN INFORMATION THAT IS PRIVILEGED, CONFIDENTIAL, AND EXEMPT FROM DISCLOSURE UNDER APPLICABLE LAW.
If the reader of this message is not the intended recipient, or the employee or agent responsible for delivering the message to the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this communication is strictly prohibited. If you have received this communication in error, please notify us immediately by telephone and return the original message to us at the above address via the U.S. postal service.

document2

9-14-92

Superior
ENVIRONMENTAL CORP

RECEIVED
SEP 14 1992
ENV. RESPONSE DIV
DETROIT DIST OFC.

REPORT OF
HYDROGEOLOGICAL WORK PLAN
WOLVERINE GASKET COMPANY
2638 PRINCESS STREET
INKSTER, MI 48141

SEPTEMBER 8, 1992

011

DETROIT DISTRICT
51 Summit Street
Brighton, MI 48116-1834
313-229-8872 Fax 229-7262

Providing Professional Environmental Services From Offices Throughout The Great Lakes and The Southeast United States

Corporate Offices
MUSKEGON, MI
2201 Wolf Lake Road
Muskegon, MI 49442-4845
616-788-5558 Fax 788-5450

REPORT OF
HYDROGEOLOGICAL WORK PLAN
WOLVERINE GASKET COMPANY
2638 PRINCESS STREET
INKSTER, MI 48141
PROJECT NO. 129101D
SEPTEMBER 8, 1992

INTRODUCTION

Superior Environmental Corp (Superior) is pleased to present the following workplan to define the lateral and vertical extent of petroleum hydrocarbon contamination beneath the building at the referenced site. The proposed work is based on site information provided by Wolverine Gasket, a hydrogeologic investigation completed by others, and our experience at this site.

Based upon our review, the source of potential impact is the former Toluene Underground Storage Tank (UST), located in the south central area of the building's western wing. The intent of this work plan is to define the extent of contamination resulting from the UST and associated distribution piping.

SCOPE OF WORK

The scope of work proposed by Superior is as follows:

- Perform a 10 point soil gas survey in the area of the former UST to determine the presence or absence of volatile contaminants in the subsurface environment.

- Based upon the results of the soil gas survey, completion of a minimum of four to six soil borings in the area surrounding the former Toluene UST (see Figure 1 - Site Map with Proposed Soil Boring Locations).

- Field screening of soils encountered with a photoionization detector (PID)

- Based on initial field screening results, completing additional borings farther away from the apparent source area in an attempt to define "clean" conditions.

- Selection of soil samples from each boring for analytical determination of Toluene and total Xylene concentrations. If no readings register on the PID throughout the boring, two samples will be submitted to confirm clean conditions in the upper and lower zone. If readings register on the PID, one sample will be taken from the zone which registered the highest PID reading, in order to establish maximum contaminant levels in relation to distance from the source. The second sample will be taken from the bottom of the boring.

- Backfill and grouting of all boreholes if subsurface water is not encountered.
- Completion of select soil borings as monitoring wells if collectible quantities of subsurface water are encountered. The soil borings will either be completed as temporary wells or as permanent wells based on location and/or site conditions within the building.
- Drum and sample auger cuttings.
- Submit auger cutting samples for disposal characteristics.
- If subsurface water is encountered, install monitoring wells with screened intervals within the first water-bearing zone encountered.

Monitoring Wells to include the following:

- Screened intervals five feet in length and consisting of 2-inch ID, Stainless Steel with machine-cut, 0.010-inch slots. Screens to be installed with a maximum of 2.5 feet below the water table.
- Two-inch Galvanized risers to ground surface.
- Number 7 silica filter sand from the terminus of the borehole to levels one to two feet above the screen/riser pipe joints.
- Bentonite pellet seals, approximately one foot thick based on site conditions, placed above the filter packs.
- Bentonite/cement slurry grout, placed in accordance to the Michigan Water Well Grouting Manual, from the bentonite seals to approximately one foot BGL.
- Locking, flush-mount protective casings grouted in place with concrete to form aprons and complete well installation.
- Develop the wells using a surge block and diaphragm pump.
- Place development water in DOT-approved 55-gallon drums, sample, and analyze for disposal.
- Allow wells to stabilize, collect static water levels, sample wells using a Teflon bailer.
- Place water samples in appropriate sample containers with Teflon lined septa.
- Prepare chains of custody for all samples and ship to an approved fixed-base laboratory for analytical determination of Toluene and total Xylenes concentrations.

Report

Upon complete definition of site conditions, Superior will prepare a report detailing the environmental conditions of the site and the type of corrective action, if any, recommended. At a minimum, the report will consist of the following:

- Introduction
- Scope of Services
- Methods
- Geologic/Hydrogeologic Conditions
- Groundwater Elevation and Contour Data
- Results
- Conclusions

The report will outline corrective action measures, as appropriate.

METHODS

Soil Gas Survey

Superior will obtain soil gas samples from 10 locations around the former UST. The purpose of the soil gas samples will be to determine the presence of contaminants and to provide a resource to direct the soil boring investigations. Superior will perform the soil gas survey by installing a hard driven probe 5 feet into the soils below the buidling foundation. A vacuum will be applied to the probe to extract vapors from the native soils using a vacuum pump. The exhaust from the vacuum pump will be screened utilizing a PID.

Superior will record the maximum and average sustained Total VOC reading from each probe to determine the relative impact potential at each monitoring point. In addition Superior will capture a sample of the airstream, using a gastight locking syringe, for injection into a portable gas chromatograph (PGC). The PGC will be used to determine the Toluene and Xylene concentration in the soil gas.

The results of the PGC will be use in conjuction with the PID readings to determine the presence or absence of subsurface impact at the site.

Soil Borings

The soil boring program discussed below is contingent upon the presence of impacted soils. If impacted soils are not encountered, Superior does not anticipate further site work.

At present the soil borings will be placed in locations detailed in Figure 1 - Site Plan. However, Superior may modify the locations if the soil gas survey indicates the need for the change. The soil borings will be advanced below the extent of impact (estimated to be within the upper 12 feet) using dry drilling methods and 3 inch diameter solid stem augers. A geologist will supervise the soil boring emplacement. Auger cuttings will be placed in Department of Transportation (DOT) approved 55-gallon drums for evaluation and disposal. Soil samples will be obtained from auger flights or utilizing portable augers and/or spoon sampling equipment.

Soil samples will be field screened with a PID, geologically logged by a geologist, along with the field screened readings, and placed in 4 ounce, Teflon capped, glass sample jars. The samples will be stored in a cooler maintained at 4 degrees Celsius.

Decontamination

All the tools (spatulas, knives, hand augers, etc.) used by the geologist will be decontaminated between samples with a phosphate-free solution wash and a deionized water triple rinse. The decontamination water and latex gloves used by the field crew will be placed in 55-gallon drums pending disposition.

Superior will perform the soil gas survey by drilling a 1 inch diameter hole through the concrete floor. A probe will be driven approximately 5 feet into the soils below the floor of he building. A vacuum pump will be used to extract soil gas from the slotted tip of the probe. The evacuated gas will be screened with a PID. The maximum and the average sustained VOC concentrations will be recorded. A gas sample will be drawn from the air stream using a sealable hypodermic needle. The gas will be injected into a portable gas chomatógraph (PGC) to give the concentration of Toluene and Xylenes in the air stream. The results will be used to determine if the area is impacted, and if so the areas most substantially impacted.

All drilling tools and well supplies will be decontaminated prior to and between use. Decontaminations will be accomplished by high pressure/temperature washer and/or phosphate-free solution wash and rinse. All decontamination by-products will be placed in 55-gallon drums for disposition.

Analysis

Following completion of each soil boring, Superior will select two sample for the analytical determination of Toluene and total Xylenes concentrations per U.S. Environmental Protection Agency (EPA) approved methods. Proper Chain-of-Custody protocols will be used to track sample handling and shipment.

Monitoring Wells

If subsurface water is encountered during boring operations, select borings may be completed as monitoring wells. The screened interval will be set to straddle the vadose zone/saturated zone interface. A maximum of three (3) feet of well screen will be installed below the vadose zone/saturated zone interface.

Construction

The monitoring wells will be constructed of 2 inch Galvanized casing with five (5) feet of 0.010 inch slot screened interval. Number 7 silica sand will be placed in the annular space around the screened section to provide a sand pack for the screen. The sand pack will extend approximately one (1) foot to two (2) feet above the well screen. Bentonite pellets will be placed a minimum of one (1) foot above the sand pack to seal the pack and prevent vertical migration of vadose water. The grouting procedure will be consistent with Section 6 of the Michigan Water Well Grouting Manual, published in 1988 by the Michigan Department of Public Health, Ground Water Quality Control Section. The well heads will be fitted with locking caps and flush-mount, traffic-rated vaults to limit unauthorized access and minimize surface water infiltration.

Decontamination

All drilling tools and well supplies will be decontaminated prior to and between use. Decontaminations will be accomplished by high pressure/temperature washer and/or phosphate-free solution wash and rinse. All decontamination by-products will be placed in 55-gallon drums for disposition.

Static Level Determination and Well Development

Prior to the developing and sampling of the wells, the static water levels will be acquired to the nearest 0.01 foot using an electronic air/water interface probe. The probe will be decontaminated before and after use, using a phosphate-free solution wash and a deionized water triple rinse. The monitoring wells will be developed with a surge block and diaphragm pump to increase the

hydraulic communication between wells and the native formation. During development, care will be taken to prevent damage to the well screens. The development process will continue until the well water is essentially sediment-free. When the wells are properly developed, the pump will be decontaminated by flushing with a phosphate-free solution wash and deionized water triple rinse. Development water will be placed in 55-gallon drums for disposition. The wells will be allowed to recover (but not for more than 3 hours) prior to sampling.

Analysis

Water samples will be obtained, using a Teflon bailer, from the screened interval of the monitoring wells and placed in preserved (1:1 HCl), 40 milliliter, Teflon capped glass VOA vials. The bailer will be decontaminated before and after use, using a phosphate-free solution wash and deionized water triple rinse. All decontamination water will be stored in 55-gallon drums for disposition. The water filled VOAs will be packed in protective wrapping and placed in a cooler maintained at 4 degrees Celsius for transportation to an independent laboratory.

The laboratory will analyze the water sample for Toluene and Xylene constituents per EPA approved methods. Proper chain-of-custody forms will be carefully documented. Quality control samples will be included. An equipment rinse will be included to provide quality assurance of the decontamination process and a duplicate field sample to provide quality assurance of the laboratory procedures.

Surveying

Upon completion of the borings/monitoring well, a land survey will be performed to locate the borings/wells to the nearest foot. A site map will be prepared which shows all borings/wells relative to site features. The borings/wells will be identified by a number and letter designation. Top of casing and ground elevations will be obtained. The top of casing elevations will be to the nearest 0.01 foot and the ground elevations will be to the nearest 0.1 foot.

Abandonment

In the event that water is not encountered in the boring, the boring will be properly abandoned. The abandoned boring will be filled from the bottom towards the surface with a bentonite/cement grout. The grouting procedure will be consistent with Section 6 of the Michigan Water Well Grouting Manual published, in 1988, by the Michigan Department of Public Health, Ground Water Quality Control Section. Using a tremie pipe, the grout is applied in one continuous event to prevent segregation, dilution, or bridging of the sealant. The bentonite/cement grout will be covered with a concrete cap. The concrete cap will be covered with asphalt.

FIGURE

Rommeck, Doug

From: James Ferritto [FERRITTJ@michigan.gov]
Sent: Wednesday, September 04, 2002 3:52 PM
To: Rommeck, Doug
Subject: Wolverine Gasket, Inkster, MI

Doug,

Per our conversation today, here's what I believe are important discussion items that your consultant should be able to address when we meet.

1. Identify all the issues with the current groundwater treatment system that prohibit it from operating continuously as designed. They should be prepared to recommend the necessary actions that will keep the system running in the winter as that seems to have been a historical problem with the current design. Keeping the system operating continuously is important because we have significant levels of contaminants that are above several applicable cleanup criteria.

2. Collect current water level readings from all wells at the site, and use these data to verify the groundwater flow direction. Establishing a current benchmark with rod and level may be necessary.

3. Use all current and historical date to establish an estimated extent of soil and groundwater contamination. There will likely be "blind spots" or data gaps that will have to be addressed, but we can go over them in our meeting.

4. A treatment system inspection schedule should be prepared with actions developed in the event the system goes down again. I would imagine weekly inspections would be appropriate and would help eliminate long periods of inoperation.

5. An updated radius of influence that the treatment system induces, when operational, should also be presented.

I believe that covers the more pressing matters. If you have any others, please feel to add them to the list. This meeting will be a good step in the right direction. As far as schedule goes, we can try to set something up for the week of September 23 if it works with your schedule as well. Give me a call or reply to this email with a tentative meeting date and time and we'll go from there.

Thanks.

Jim Ferritto, CPG
Geologist
MDEQ - ERD
38980 W. Seven Mile Rd.
Livonia, MI 48152-1006

PH: (734) 953-1429
FAX: (734) 953-1544
email: ferrittj@michigan.gov

MI0012588

ARCADIS

Table 2. Summary of Groundwater Analytical Data, Eagle-Picher Automotive Group, Wolverine Gasket Division, Inkster, Michigan.

Sample ID: Date Sampled:	Benzene	Toluene	Ethylbenzene	Xylenes
MW-1				
5/11/1999	3,300	720	110	220
9/20/1999	**15,000**	160	310	460
2/2/2000	NS	NS	NS	NS
7/17/2000	8,400	12,000	750	3,100
11/14/2000	**13,000**	1,300	180	550
5/22/2001	580	460	210	840
1/14/2002	6200	63	62	120
MW-2				
5/11/1999	270	**120,000**	3,000	14,000
9/20/1999	6,500	5,500	20,000	29,000
2/2/2000	<100	**140,000**	4,000	20,000
7/17/2000	190	**120,000**	2,600	13,000
11/14/2000	110	**69,000**	720	3,300
5/22/2001	320	**140,000**	3,600	17,000
1/14/2002	<500	**32,000**	1,200	5,500
MW-3				
5/11/1999	1,300	8,100	800	3,200
9/20/1999	**12,000**	1,500	6,500	5,200
2/2/2000	6,500	7,600	960	3,800
7/17/2000	5,900	6,700	970	3,400
11/14/2000	7,700	470	200	350
5/22/2001	4,100	3,100	470	1,800
1/14/2002	7,400	2,500	520	1,500
MW-6				
5/11/1999	<1.0	1.6	<1.0	<3.0
9/20/1999	NS	NS	NS	NS
2/2/2000	<1.0	<1.0	<1.0	<3.0
7/17/2000	NS	NS	NS	NS
11/14/2000	<1.0	<1.0	<1.0	<3.0
5/22/2001	<1.0	<1.0	<1.0	<3.0
1/14/2002	<1.0	<1.0	<1.0	<3.0
Groundwater Contract Criteria	11,000	530,000	170,000	186,000
Flammability and Explosivity Screening Level	34,000	31,000	22,000	35,000

See page 3 for notes.

ARCADIS

Table 2. Summary of Groundwater Analytical Data, Eagle-Picher Automotive Group, Wolverine Gasket Division, Inkster, Michigan.

Sample ID: Date Sampled:	Benzene	Toluene	Ethylbenzene	Xylenes
MW-7				
5/11/1999	**9,900**	**35,000**	11,000	**44,000**
9/20/1999	6,500	4,900	18,000	24,000
2/2/2000	**12,000**	**36,000**	11,000	**56,000**
7/17/2000	4,600	26,000	7,400	32,000
11/14/2000	8,800	14,000	5,000	22,000
5/22/2001	2,600	4,400	2,400	10,000
1/14/2002	6,400	9,400	4,800	20,000
MWO-01				
5/11/1999	<1.0	<1.0	<1.0	<3.0
9/20/1999	<1.0	<1.0	<1.0	<3.0
2/2/2000	<1.0	<1.0	<1.0	<3.0
7/17/2000	<1.0	<1.0	<1.0	<3.0
11/14/2000	<1.0	<1.0	<1.0	<3.0
5/22/2001	<1.0	<1.0	<1.0	<3.0
1/14/2002	<1.0	<1.0	<1.0	<3.0
MWO-02				
5/11/1999	<1.0	<1.0	<1.0	<3.0
9/20/1999	<1.0	<1.0	<1.0	<3.0
2/2/2000	<1.0	<1.0	<1.0	<3.0
7/17/2000	<1.0	<1.0	<1.0	<3.0
11/14/2000	<1.0	<1.0	<1.0	<3.0
5/22/2001	<1.0	<1.0	<1.0	<3.0
1/14/2002	<1.0	<1.0	<1.0	<3.0
Groundwater Contract Criteria	11,000	530,000	170,000	186,000
Flammability and Explosivity Screening Level	34,000	31,000	22,000	35,000

See page 3 for notes.

ARCADIS

Table 2. Summary of Groundwater Analytical Data, Eagle-Picher Automotive Group, Wolverine Gasket Division, Inkster, Michigan.

Sample ID: Date Sampled:	Benzene	Toluene	Ethylbenzene	Xylenes
MWO-03				
5/11/1999	<1.0	<1.0	<1.0	<3.0
9/20/1999	<1.0	<1.0	<1.0	<3.0
2/2/2000	<1.0	<1.0	<1.0	<3.0
7/17/2000	<1.0	<1.0	<1.0	<3.0
11/14/2000	<1.0	<1.0	<1.0	<3.0
5/22/2001	<1.0	<1.0	<1.0	<3.0
1/14/2002	<1.0	<1.0	<1.0	<3.0
Sump				
5/11/1999	NS	NS	NS	NS
9/20/1999	NS	NS	NS	NS
2/2/2000	8,000	31,000	1,000	5,000
7/17/2000	<1.0	<1.0	<1.0	<3.0
11/14/2000	NS	NS	NS	NS
5/22/2001	NS	NS	NS	NS
1/14/2002	NS	NS	NS	NS
Groundwater Contract Criteria	11,000	530,000	170,000	186,000
Flammability and Explosivity Screening Level	34,000	31,000	22,000	35,000

Notes:

< Constituent concentration was less than indicated concentration.

NS Constituent was not sampled during monitoring event.

All units reported in micrograms per liter (μg/L).

Bold values indicate concentrations exceeding relevant criteria.

Table 5. Groundwater Analytical Data; Volatile Organic Compounds; Eagle-Picher Automotive, Wolverine Gasket Division, Inkster, Michigan.

Sample ID:	MW-1	MW-2	MW-3	MW-5	MW-6	MW-7	MWO-01	MWO-02	MWO-03	Groundwater Contact Criteria	Flammability and Explosivity Screening Level
Date Sampled:	5/11/99	5/11/99	5/11/99	5/11/99	5/11/99	5/11/99	5/11/99	5/11/99	5/11/99		
Ethylbenzene	110	3,000	800	<1.0	<1.0	11,000	<1.0	<1.0	<1.0	170,000	22,000
Ethylene Dibromide	<1.0	<100	<1.0	<1.0	<1.0	<100	<1.0	<1.0	<1.0	16	ID
Hexachlorobutadiene	<5.0	<500	<5.0	<5.0	<5.0	<500	<5.0	<5.0	<5.0	200	ID
2-Hexanone	<50	<5,000	<50	<50	<50	<5,000	<50	<50	<50	480,000	ID
Iodomethane	<1.0	<100	<1.0	<1.0	<1.0	<100	<1.0	<1.0	<1.0	NA	NA
Isobutyl Acetate	<10	<1,000	<10	<10	<10	<1,000	<10	<10	<10	NA	NA
Isopropylbenzene	<1.0	<100	4	<1.0	<1.0	<100	<1.0	<1.0	<1.0	56,000	ID
Methylene Chloride	<5.0	<500	<5.0	<5.0	<5.0	<500	<5.0	<5.0	<5.0	110,000	ID
2-Methylnaphthalene	<5.0	<500	<5.0	<5.0	<5.0	<500	<5.0	<5.0	<5.0	32,000	ID
4-Methyl-2-Pentanone	<50	<5,000	<50	<50	<50	<5,000	<50	<50	<50	12,000,000	ID
Methyl tert-butyl Ether	<50	<5,000	<50	<50	<50	<5,000	<50	<50	<50	650,000	ID
Naphthalene	<5.0	<500	<5.0	<5.0	<5.0	<500	<5.0	<5.0	<5.0	31,000	31,000
n-Propylbenzene	<1.0	<100	<1.0	<1.0	<1.0	<100	<1.0	<1.0	<1.0	ID	ID
Styrene	<1.0	<100	<1.0	<1.0	<1.0	<100	<1.0	<1.0	<1.0	3,200	68,000
1,1,1,2-Tetrachloroethane	<1.0	<100	<1.0	<1.0	<1.0	<100	<1.0	<1.0	<1.0	11,000	ID
1,1,2,2-Tetrachloroethane	<1.0	<100	<1.0	<1.0	<1.0	<100	<1.0	<1.0	<1.0	2,100	ID
Tetrachloroethene	<1.0	<100	<1.0	<1.0	<1.0	<100	<1.0	<1.0	<1.0	5,100	ID
Toluene	720	120,000	8,100	<1.0	1.6	35,000	<1.0	<1.0	<1.0	530,000	31,000
1,2,3-Trichlorobenzene	<5.0	<500	<5.0	<5.0	<5.0	<500	<5.0	<5.0	<5.0	NA	NA
1,2,4-Trichlorobenzene	<5.0	<500	<5.0	<5.0	<5.0	<500	<5.0	<5.0	<5.0	15,000	ID
1,1,1-Trichloroethane	<1.0	<100	<1.0	<1.0	<1.0	<100	<1.0	<1.0	<1.0	220,000	ID
1,1,2-Trichloroethane	<1.0	<100	<1.0	<1.0	<1.0	<100	<1.0	<1.0	<1.0	9,500	1,800,000
Trichloroethene	<1.0	<100	<1.0	<1.0	<1.0	<100	<1.0	<1.0	<1.0	11,000	ID
Trichlorofluoromethane	<1.0	<100	<1.0	<1.0	<1.0	<100	<1.0	<1.0	<1.0	1,100,000	ID
1,2,3-Trichloropropane	<1.0	<100	<1.0	<1.0	<1.0	<100	<1.0	<1.0	<1.0	74,000	ID
1,2,4-Trimethylbenzene	1.9	<100	<1.0	<1.0	<1.0	<100	<1.0	<1.0	<1.0	160,000	ID
1,3,5-Trimethylbenzene	<1.0	<100	<1.0	<1.0	<1.0	<100	<1.0	<1.0	<1.0	210,000	ID
Vinyl Acetate	<50	<5,000	<50	<50	<50	<5,000	<50	<50	<50	7,700,000	880,000
Vinyl Chloride	<1.0	<100	<1.0	<1.0	<1.0	<100	<1.0	<1.0	<1.0	290	17,000
Xylenes	220	14,000	3,200	<3.0	<3.0	44,000	<3.0	<3.0	<3.0	190,000	35,000

Notes:

< Less than.

NA Cleanup criteria not available for listed compound.

ID Inadequate data to develop cleanup criteria.

Bold Concentration equals or exceeds applicable cleanup criteria.

All compound concentrations shown in micrograms per liter (ug/L).

Cleanup criteria published in the Integrated Table of Part 201 Cleanup Criteria, May 28, 1999.

Table 4. Soil Analytical Data; Volatile Organic Compounds; Eagle-Picher Automotive, Wolverine Gasket Division, Inkster, Michigan.

Sample ID:	HA-1	HA-1	HA-2	HA-2	HA-3	HA-4	HA-5	Groundwater Contact Protection Criteria	Industrial Direct Contact Criteria	Soil Volatilization Indoor Air Criteria	Soil Saturation Concentration Screening Levels
Date Sampled:	5/10/99	5/10/99	5/10/99	5/10/99	5/10/99	5/10/99	5/10/99				
Sample Depth:	0-2'	4-5'	0-1'	4-5'	4-5'	4-5'	2-3'				
1,1-Dichloropropene	<50	<50	<50	<50	<50	<50	<50	NA	NA	NA	NA
cis-1,3-Dichloropropene	<50	<50	<50	<50	<50	<50	<50	52,000	140,000	79	620,000
trans-1,3-Dichloropropene	<50	<50	<50	<50	<50	<50	<50	52,000	140,000	79	620,000
Ethylbenzene	98	16,000	77	4,100	6,600	12,000	7,900	140,000	140,000	140,000	140,000
Ethylene Dibromide	<50	<50	<50	<50	<50	<50	<50	320	290	670	890,000
Hexachlorobutadiene	<50	<50	<50	<50	<50	<50	<50	340,000	350,000	130,000	350,000
2-Hexanone	<250	<250	<250	<250	<250	<250	<250	2,500,000	2,500,000	990,000	2,500,000
Iodomethane	<100	<100	<100	<100	<100	<100	<100	NA	NA	NA	NA
Isopropylbenzene	<100	220	<100	<100	130	200	<100	390,000	390,000	390,000	390,000
Methylene Chloride	<250	<250	<250	<250	<250	<250	<250	2,200,000	2,300,000	45,000	2,300,000
2-Methylnaphthalene	<250	<250	<250	<250	<250	<250	<250	7,100,000	160,000,000	ID	NA
4-Methyl-2-Pentanone	<250	<250	<250	<250	<250	<250	<250	2,700,000	2,700,000	2,700,000	27,000,000
Methyl tert-butyl Ether	<250	<250	<250	<250	<250	<250	<250	6,000,000	6,000,000	6,000,000	6,000,000
Naphthalene	<250	630	<250	<250	<250	<250	<250	2,000,000	160,000,000	42,000,000	NA
n-Propylbenzene	<100	120	<100	<100	<100	110	<100	ID	8,200,000	ID	10,000,000
Styrene	<50	<50	<50	<50	<50	<50	<50	85,000	520,000	240,000	520,000
1,1,1,2-Tetrachloroethane	<100	<100	<100	<100	<100	<100	<100	220,000	950,000	12,000	980,000
1,1,2,2-Tetrachloroethane	<100	<100	<100	<100	<100	<100	<100	42,000	120,000	4,300	870,000
Tetrachloroethene	<50	<50	<50	<50	<50	<50	<50	88,000	88,000	11,000	88,000
Toluene	720	28,000	150	340	1,300,000	18,000	7,800	250,000	250,000	250,000	250,000
1,2,3-Trichlorobenzene	<250	<250	<250	<250	<250	<250	<250	NA	NA	NA	NA
1,2,4-Trichlorobenzene	<250	<250	<250	<250	<250	<250	<250	890,000	1,100,000	1,100,000	1,100,000
1,1,1-Trichloroethane	<50	<50	<50	<50	<50	<50	<50	460,000	460,000	250,000	460,000
1,1,2-Trichloroethane	<50	<50	<50	<50	<50	<50	<50	190,000	440,000	4,600	920,000
Trichloroethene	<50	<50	<50	<50	<50	<50	<50	220,000	500,000	7,000	500,000
Trichlorofluoromethane	<250	<250	<250	<250	<250	<250	<250	560,000	560,000	560,000	560,000
1,2,3-Trichloropropane	<100	<100	<100	<100	<100	<100	<100	830,000	830,000	ID	830,000
1,2,4-Trimethylbenzene	<100	<100	<100	<100	<100	<100	<100	110,000	110,000	110,000	110,000
1,3,5-Trimethylbenzene	<100	<100	<100	<100	<100	<100	<100	94,000	94,000	94,000	94,000
Vinyl Acetate	<250	<250	<250	<250	<250	<250	<250	2,400,000	2,400,000	790,000	2,400,000
Vinyl Chloride	<100	<100	<100	<100	<100	<100	<100	5,800	11,000	28	490,000
Xylenes	1,300	80,000	730	8,700	30,000	54,000	85,000	150,000	150,000	150,000	150,000

Notes:

<	Less than.
NA	Cleanup criteria not available for listed compound.
ID	Inadequate data to develop cleanup criteria.
Bold	Concentration equals or exceeds applicable cleanup criteria.

All compound concentrations shown in micrograms per kilogram (ug/kg).
Cleanup criteria published in the Integrated Table of Part 201 Cleanup Criteria, May 28, 1999.

Table 5. Groundwater Analytical Data; Volatile Organic Compounds; Eagle-Picher Automotive, Wolverine Gasket Division, Inkster, Michigan.

Sample ID: Date Sampled:	MW-1 5/11/99	MW-2 5/11/99	MW-3 5/11/99	MW-5 5/11/99	MW-6 5/11/99	MW-7 5/11/99	MWO-01 5/11/99	MWO-02 5/11/99	MWO-03 5/11/99	Groundwater Contact Criteria	Flammability and Explosivity Screening Level
Acetone	<100	<10,000	<100	<100	<100	<10,000	<100	<100	<100	31,000,000	7,500,000
Acrolein	<5.0	<500	<5.0	<5.0	<5.0	<500	<5.0	<5.0	<5.0	3,400,000	3,300,000
Acrylonitrile	<1.0	<100	<1.0	<1.0	<1.0	<100	<1.0	<1.0	<1.0	8,100	ID
Benzene	3,300	270	1,300	<1.0	<1.0	9,900	<1.0	<1.0	<1.0	9,400	34,000
Bromobenzene	<1.0	<100	<1.0	<1.0	<1.0	<100	<1.0	<1.0	<1.0	9,900	ID
Bromochloromethane	<1.0	<100	<1.0	<1.0	<1.0	<100	<1.0	<1.0	<1.0	NA	NA
Bromodichloromethane	<1.0	<100	<1.0	<1.0	<1.0	<100	<1.0	<1.0	<1.0	11,000	ID
Bromoform	<1.0	<100	<1.0	<1.0	<1.0	<100	<1.0	<1.0	<1.0	100,000	ID
Bromomethane	<1.0	<100	<1.0	<1.0	<1.0	<100	<1.0	<1.0	<1.0	65,000	ID
2-Butanone	<50	<5,000	<50	<50	<50	<5,000	<50	<50	<50	240,000,000	ID
n-Butylbenzene	<1.0	<100	<1.0	<1.0	<1.0	<100	<1.0	<1.0	<1.0	ID	ID
sec-Butylbenzene	<1.0	<100	<1.0	<1.0	<1.0	<100	<1.0	<1.0	<1.0	ID	ID
tert-Butylbenzene	<1.0	<100	<1.0	<1.0	<1.0	<100	<1.0	<1.0	<1.0	ID	ID
Carbon Disulfide	<50	<5,000	<50	<50	<50	<5,000	<50	<50	<50	1,100,000	6,500
Carbon Tetrachloride	<1.0	<100	<1.0	<1.0	<1.0	<100	<1.0	<1.0	<1.0	1,600	ID
Chlorobenzene	1,800	56,000	20,000	<1.0	<1.0	180,000	<1.0	<1.0	<1.0	68,000	79,000
Chloroethane	<1.0	<100	<1.0	<1.0	<1.0	<100	<1.0	<1.0	<1.0	200,000	56,000
2-Chloroethyl Vinyl Ether	<10	<1,000	<10	<10	<10	<1,000	<10	<10	<10	ID	ID
Chloroform	<1.0	<100	<1.0	<1.0	<1.0	<100	<1.0	<1.0	<1.0	96,000	ID
Chloromethane	<1.0	<100	<1.0	<1.0	<1.0	<100	<1.0	<1.0	<1.0	110,000	18,000
2-Chlorotoluene	<1.0	<100	<1.0	<1.0	<1.0	<100	<1.0	<1.0	<1.0	35,000	ID
4-Chlorotoluene	<1.0	<100	<1.0	<1.0	<1.0	<100	<1.0	<1.0	<1.0	35,000	ID
Dibromochloromethane	<1.0	<100	<1.0	<1.0	<1.0	<100	<1.0	<1.0	<1.0	9,500	ID
1,2-Dibromo-3-Chloropropane	<1.0	<100	<1.0	<1.0	<1.0	<100	<1.0	<1.0	<1.0	ID	ID
Dibromomethane	<1.0	<100	<1.0	<1.0	<1.0	<100	<1.0	<1.0	<1.0	510,000	ID
1,2-Dichlorobenzene	<1.0	<100	<1.0	<1.0	<1.0	<100	<1.0	<1.0	<1.0	160,000	ID
1,3-Dichlorobenzene	<1.0	<100	<1.0	<1.0	<1.0	<100	<1.0	<1.0	<1.0	110,000	ID
1,4-Dichlorobenzene	<1.0	<100	<1.0	<1.0	<1.0	<100	<1.0	<1.0	<1.0	2,800	ID
Dichlorodifluoromethane	<1.0	<100	<1.0	<1.0	<1.0	<100	<1.0	<1.0	<1.0	300,000	ID
1,1-Dichloroethane	<1.0	<100	<1.0	<1.0	<1.0	<100	<1.0	<1.0	<1.0	2,100,000	ID
1,2-Dichloroethane	<1.0	<100	<1.0	<1.0	<1.0	<100	<1.0	<1.0	<1.0	11,000	ID
1,1-Dichloroethene	<1.0	<100	<1.0	<1.0	<1.0	<100	<1.0	<1.0	<1.0	9,000	48,000
cis-1,3-Dichloroethene	<1.0	<100	<1.0	<1.0	<1.0	<100	<1.0	<1.0	<1.0	170,000	270,000
trans-1,3-Dichloroethene	<1.0	<100	<1.0	<1.0	<1.0	<100	<1.0	<1.0	<1.0	190,000	120,000
1,2-Dichloropropane	<1.0	<100	<1.0	<1.0	<1.0	<100	<1.0	<1.0	<1.0	7,500	270,000
1,3-Dichloropropane	<1.0	<100	<1.0	<1.0	<1.0	<100	<1.0	<1.0	<1.0	NA	NA
2,2-Dichloropropane	<1.0	<100	<1.0	<1.0	<1.0	<100	<1.0	<1.0	<1.0	NA	NA
1,1-Dichloropropene	<1.0	<100	<1.0	<1.0	<1.0	<100	<1.0	<1.0	<1.0	NA	NA
cis-1,3-Dichloropropene	<1.0	<100	<1.0	<1.0	<1.0	<100	<1.0	<1.0	<1.0	2,600	ID
trans-1,3-Dichloropropene	<1.0	<100	<1.0	<1.0	<1.0	<100	<1.0	<1.0	<1.0	2,600	ID

See notes of page 2.

Table 4. Soil Analytical Data; Volatile Organic Compounds; Eagle-Picher Automotive, Wolverine Gasket Division, Inkster, Michigan.

Sample ID:	HA-1	HA-1	HA-2	HA-2	HA-3	HA-4	HA-5	Groundwater Contact Protection Criteria	Industrial Direct Contact Criteria	Soil Volatilization to Indoor Air Criteria	Soil Saturation Concentration Screening Levels
Date Sampled:	5/10/99	5/10/99	5/10/99	5/10/99	5/10/99	5/10/99	5/10/99				
Sample Depth:	0-2'	4-5'	0-1'	4-5'	4-5'	4-5'	2-3'				
Acetone	<750	<750	<750	<750	<750	<750	<750	100,000,000	74,000,000	110,000,000	110,000,000
Acrolein	<50	<50	<50	<50	<50	<50	<50	23,000,000	12,000,000	760	23,000,000
Acrylonitrile	<250	<250	<250	<250	<250	<250	<250	160,000	46,000	35,000	8,300,000
Benzene	<50	<50	<50	<50	<50	<50	<50	190,000	400,000	8,400	400,000
Bromobenzene	<50	<50	<50	<50	<50	<50	<50	300,000	760,000	580,000	760,000
Bromochloromethane	<100	<100	<100	<100	<100	<100	<100	NA	NA	NA	NA
Bromodichloromethane	<100	<100	<100	<100	<100	<100	<100	220,000	400,000	6,400	1,500,000
Bromoform	<100	<100	<100	<100	<100	<100	<100	870,000	870,000	770,000	870,000
Bromomethane	<250	<250	<250	<250	<250	<250	<250	1,300,000	1,000,000	1,600	2,200,000
2-Butanone	<250	<250	<250	<250	<250	<250	<250	27,000,000	27,000,000	27,000,000	27,000,000
n-Butylbenzene	<50	<50	<50	<50	<50	<50	<50	ID	8,200,000	ID	10,000,000
sec-Butylbenzene	<50	<50	<50	<50	<50	<50	<50	ID	8,200,000	ID	10,000,000
tert-Butylbenzene	<50	<50	<50	<50	<50	<50	<50	ID	8,200,000	ID	10,000,000
Carbon Disulfide	<250	<250	<250	<250	<250	<250	<250	280,000	280,000	140,000	280,000
Carbon Tetrachloride	<50	<50	<50	<50	<50	<50	<50	32,000	190,000	990	390,000
Chlorobenzene	1,800	190,000	330	51,000	67,000	130,000	160,000	260,000	260,000	220,000	260,000
Chloroethane	<250	<250	<250	<250	<250	<250	<250	970,000	970,000	970,000	970,000
2-Chloroethyl Vinyl Ether	<250	<250	<250	<250	<250	<250	<250	ID	ID	ID	1,900,000
Chloroform	<50	<50	<50	<50	<50	<50	<50	1,500,000	1,500,000	38,000	1,500,000
Chloromethane	<250	<250	<250	<250	<250	<250	<250	1,100,000	1,100,000	12,000	1,100,000
2-Chlorotoluene	<50	<50	<50	<50	<50	<50	<50	500,000	500,000	500,000	500,000
4-Chlorotoluene	<50	<50	<50	<50	<50	<50	<50	500,000	500,000	500,000	500,000
Dibromochloromethane	<100	<100	<100	<100	<100	<100	<100	190,000	300,000	21,000	610,000
1,2-Dibromo-3-Chloropropane	<250	<250	<250	<250	<250	<250	<250	ID	2,100	ID	ID
Dibromomethane	<100	<100	<100	<100	<100	<100	<100	1,900,000	210,000	ID	2,000,000
1,2-Dichlorobenzene	<100	<100	<100	<100	<100	<100	<100	210,000	210,000	210,000	210,000
1,3-Dichlorobenzene	<100	<100	<100	<100	<100	<100	<100	200,000	200,000	ID	200,000
1,4-Dichlorobenzene	<100	<100	<100	<100	<100	<100	<100	60,000	1,000,000	100,000	NA
Dichlorodifluoromethane	<250	<250	<250	<250	<250	<250	<250	1,000,000	1,000,000	1,000,000	1,000,000
1,1-Dichloroethane	<50	<50	<50	<50	<50	<50	<50	790,000	790,000	790,000	790,000
1,2-Dichloroethane	<50	<50	<50	<50	<50	<50	<50	220,000	270,000	11,000	1,200,000
1,1-Dichloroethene	<50	<50	<50	<50	<50	<50	<50	180,000	580,000	330	580,000
cis-1,2-Dichloroethene	<50	<50	<50	<50	<50	<50	<50	640,000	640,000	640,000	640,000
trans-1,2-Dichloroethene	<50	<50	<50	<50	<50	<50	<50	1,400,000	1,400,000	1,400,000	1,400,000
1,2-Dichloropropane	<50	<50	<50	<50	<50	<50	<50	150,000	360,000	7,400	550,000
1,3-Dichloropropane	<50	<50	<50	<50	<50	<50	<50	NA	NA	420	NA
2,2-Dichloropropane	<50	<50	<50	<50	<50	<50	<50	NA	NA	NA	NA

See Notes on page 2.

FACSIMILE TRANSMISSION

WOLVERINE GASKET DIVISION

INKSTER, MICHIGAN

FAX: 313/562-8248

TO: MI DEQ Date: Monday, August 19, 2002

ATTN: **Mr. Jim Ferritto**
Fax: 734/953-1544
FROM: Douglas Rommeck

Number of pages including cover: 9

SUBJECT: Eagle Picher Automotive-Wolverine Gasket Division, Inkster

---

Mr. Ferritto,

As requested, please find the site layout map and analytical data for the Wolverine Gasket, Inkster facility. The next groundwater sampling event will be September 27, 2002.

If I can answer any additional information, I can be reached at 313/724-2006.

Thank you,

Douglas Rommeck
Eagle Picher Automotive

ARCADIS

Table 2. Summary of Groundwater Analytical Data, Eagle-Picher Automotive Group, Wolverine Gasket Division, Inkster, Michigan.

Sample ID: Date Sampled:	Benzene	Toluene	Ethylbenzene	Xylenes
MW-1				
5/11/1999	3,300	720	110	220
9/20/1999	**15,000**	160	310	460
2/2/2000	NS	NS	NS	NS
7/17/2000	8,400	12,000	750	3,100
11/14/2000	**13,000**	1,300	180	550
5/22/2001	580	460	210	840
1/14/2002	6200	63	62	120
MW-2				
5/11/1999	270	**120,000**	3,000	14,000
9/20/1999	6,500	5,500	20,000	29,000
2/2/2000	<100	**140,000**	4,000	20,000
7/17/2000	190	**120,000**	2,600	13,000
11/14/2000	110	**69,000**	720	3,300
5/22/2001	320	**140,000**	3,600	17,000
1/14/2002	<500	**32,000**	1,200	5,500
MW-3				
5/11/1999	1,300	8,100	800	3,200
9/20/1999	**12,000**	1,500	6,500	5,200
2/2/2000	6,500	7,600	960	3,800
7/17/2000	5,900	6,700	970	3,400
11/14/2000	7,700	470	200	350
5/22/2001	4,100	3,100	470	1,800
1/14/2002	7,400	2,500	520	1,500
MW-6				
5/11/1999	<1.0	1.6	<1.0	<3.0
9/20/1999	NS	NS	NS	NS
2/2/2000	<1.0	<1.0	<1.0	<3.0
7/17/2000	NS	NS	NS	NS
11/14/2000	<1.0	<1.0	<1.0	<3.0
5/22/2001	<1.0	<1.0	<1.0	<3.0
1/14/2002	<1.0	<1.0	<1.0	<3.0
Groundwater Contract Criteria	11,000	530,000	170,000	186,000
Flammability and Explosivity Screening Level	34,000	31,000	22,000	35,000

See page 3 for notes.

ARCADIS

Table 2. Summary of Groundwater Analytical Data, Eagle-Picher Automotive Group, Wolverine Gasket Division, Inkster, Michigan.

Sample ID: Date Sampled:	Benzene	Toluene	Ethylbenzene	Xylenes
MW-7				
5/11/1999	**9,900**	**35,000**	11,000	**44,000**
9/20/1999	6,500	4,900	18,000	24,000
2/2/2000	**12,000**	**36,000**	11,000	**56,000**
7/17/2000	4,600	26,000	7,400	32,000
11/14/2000	8,800	14,000	5,000	22,000
5/22/2001	2,600	4,400	2,400	10,000
1/14/2002	6,400	9,400	4,800	20,000
MWO-01				
5/11/1999	<1.0	<1.0	<1.0	<3.0
9/20/1999	<1.0	<1.0	<1.0	<3.0
2/2/2000	<1.0	<1.0	<1.0	<3.0
7/17/2000	<1.0	<1.0	<1.0	<3.0
11/14/2000	<1.0	<1.0	<1.0	<3.0
5/22/2001	<1.0	<1.0	<1.0	<3.0
1/14/2002	<1.0	<1.0	<1.0	<3.0
MWO-02				
5/11/1999	<1.0	<1.0	<1.0	<3.0
9/20/1999	<1.0	<1.0	<1.0	<3.0
2/2/2000	<1.0	<1.0	<1.0	<3.0
7/17/2000	<1.0	<1.0	<1.0	<3.0
11/14/2000	<1.0	<1.0	<1.0	<3.0
5/22/2001	<1.0	<1.0	<1.0	<3.0
1/14/2002	<1.0	<1.0	<1.0	<3.0
Groundwater Contract Criteria	11,000	530,000	170,000	186,000
Flammability and Explosivity Screening Level	34,000	31,000	22,000	35,000

See page 3 for notes.

ARCADIS

Table 2. Summary of Groundwater Analytical Data, Eagle-Picher Automotive Group, Wolverine Gasket Division, Inkster, Michigan.

Sample ID: Date Sampled:	Benzene	Toluene	Ethylbenzene	Xylenes
MWO-03				
5/11/1999	<1.0	<1.0	<1.0	<3.0
9/20/1999	<1.0	<1.0	<1.0	<3.0
2/2/2000	<1.0	<1.0	<1.0	<3.0
7/17/2000	<1.0	<1.0	<1.0	<3.0
11/14/2000	<1.0	<1.0	<1.0	<3.0
5/22/2001	<1.0	<1.0	<1.0	<3.0
1/14/2002	<1.0	<1.0	<1.0	<3.0
Sump				
5/11/1999	NS	NS	NS	NS
9/20/1999	NS	NS	NS	NS
2/2/2000	8,000	31,000	1,000	5,000
7/17/2000	<1.0	<1.0	<1.0	<3.0
11/14/2000	NS	NS	NS	NS
5/22/2001	NS	NS	NS	NS
1/14/2002	NS	NS	NS	NS
Groundwater Contract Criteria	11,000	530,000	170,000	186,000
Flammability and Explosivity Screening Level	34,000	31,000	22,000	35,000

Notes:
< Constituent concentration was less than indicated concentration.
NS Constituent was not sampled during monitoring event.
All units reported in micrograms per liter (μg/L).
Bold values indicate concentrations exceeding relevant criteria.

Analytical Results MW-1 Toluene & Xylene (ug/L)

Date Sampled	Contaminate	MW-1 (ppb)	Date Sampled	Contaminate	MW-1 (ppb)
5/92	**Toluene**	**273,000**	9/99	**Toluene**	**160**
5/92	Xylenes	6,000	9/99	Xylenes	460
12/92	**Toluene**	**110,000**	2/00	**Toluene**	Not Sampled
12/92	Xylenes	8,700	2/00	Xylenes	Not Sampled
5/93	**Toluene**	**71,000**	7/00	**Toluene**	12,000
5/93	Xylenes	8,700	7/00	**Xylenes**	3,100
12/93	**Toluene**	**6,600**	11/00	**Toluene**	1,300
12/93	Xylenes	1,900	11/00	Xylenes	550
8/94	**Toluene**	**73,000**	5/01	**Toluene**	460
8/94	Xylenes	4,700	5/01	Xylenes	840
11/94	**Toluene**	**34,000**	1/02	**Toluene**	63
11/94	Xylenes	2,100	1/02	Xylenes	120
4/95	**Toluene**	**41,000**		**Toluene**	
4/95	Xylenes	5,600		Xylenes	
11/95	**Toluene**	**16,000**		**Toluene**	
11/95	Xylenes	3,200		Xylenes	
5/99	**Toluene**	**720**		**Toluene**	
5/99	Xylenes	220		Xylenes	

Analytical Results MW-2 Toluene & Xylene (ug/L)

Date Sampled	Contaminate	MW-2 (ppb)	Date Sampled	Contaminate	MW-2 (ppb)
5/92	**Toluene**	**98,000**	9/99	**Toluene**	**5,500**
5/92	Xylenes	nd	9/99	Xylenes	29,000
12/92	**Toluene**	**390,000**	2/00	**Toluene**	**140,000**
12/92	Xylenes	12,000	2/00	Xylenes	20,000
5/93	**Toluene**	**200,000**	7/00	**Toluene**	**120,000**
5/93	Xylenes	14,000	7/00	**Xylenes**	13,000
12/93	**Toluene**	**1,300**	11/00	**Toluene**	**69,000**
12/93	Xylenes	400		Xylenes	3,300
8/94	**Toluene**	**230,000**	5/01	**Toluene**	140,000
8/94	Xylenes	nd	5/01	Xylenes	17,000
11/94	**Toluene**	**110,000**	1/02	**Toluene**	<1
11/94	Xylenes	3,900	1/02	Xylenes	5,500
4/95	**Toluene**	**61,000**		**Toluene**	
4/95	Xylenes	6,100		Xylenes	
11/95	**Toluene**	**190,000**		**Toluene**	
11/95	Xylenes	7,000		Xylenes	
5/99	**Toluene**	**120,000**		**Toluene**	
5/99	Xylenes	14,000		Xylenes	

Analytical Results MW-3 Toluene & Xylene (ug/L)

Date Sampled	Contaminate	MW-3 (ppb)	Date Sampled	Contaminate	MW-3 (ppb)
5/92	**Toluene**	**3,500**	9/99	**Toluene**	**1,500**
5/92	Xylenes	1,700	9/99	Xylenes	5,200
12/92	**Toluene**	**12,000**	2/00	**Toluene**	**7,600**
12/92	Xylenes	3,800	2/00	Xylenes	3,800
5/93	**Toluene**	**11,000**	7/00	**Toluene**	**6,700**
5/93	Xylenes	3,700	7/00	**Xylenes**	3,400
12/93	**Toluene**	**3,500**	11/00	**Toluene**	**470**
12/93	Xylenes	1,800	11/00	Xylenes	350
8/94	**Toluene**	**22,000**	5/01	**Toluene**	**3,100**
8/94	Xylenes	4,600	5/01	Xylenes	1,800
11/94	**Toluene**	**9,300**	1/02	**Toluene**	2,500
11/94	Xylenes	2,600	1/02	Xylenes	1,500
4/95	**Toluene**	**7,600**		**Toluene**	
4/95	Xylenes	2,100		Xylenes	
11/95	**Toluene**	**24,000**		**Toluene**	
11/95	Xylenes	5,700		Xylenes	
5/99	**Toluene**	**8,100**		**Toluene**	
5/99	Xylenes	3,200		Xylenes	

Analytical Results MW-7 Toluene & Xylene (ug/L)

Date Sampled	Contaminate	MW-7 (ppb)	Date Sampled	Contaminate	MW-7 (ppb)
5/92	**Toluene**	**4,000**	9/99	**Toluene**	**4,900**
5/92	Xylenes	56,000	9/99	Xylenes	24,000
12/92	**Toluene**	**47,000**	2/00	**Toluene**	**12,000**
12/92	Xylenes	58,000	2/00	Xylenes	56,000
5/93	**Toluene**	**780,000**	7/00	**Toluene**	**26,000**
5/93	Xylenes	15,000	7/00	**Xylenes**	32,000
12/93	**Toluene**	**12,000**	**11/00**	**Toluene**	**14,000**
12/93	Xylenes	20,000	11/00	Xylenes	22,000
8/94	**Toluene**	**28,000**	5/01	**Toluene**	**4,400**
8/94	Xylenes	30,000	5/01	Xylenes	10,000
11/94	**Toluene**	**16,000**	1/02	**Toluene**	9,400
11/94	Xylenes	15,000	1/02	Xylenes	20,00
4/95	**Toluene**	**56,000**		**Toluene**	
4/95	Xylenes	51,000		Xylenes	
11/95	**Toluene**	**37,000**		**Toluene**	
11/95	Xylenes	41,000		Xylenes	
5/99	**Toluene**	**35,000**		**Toluene**	
5/99	Xylenes	44,000		Xylenes	

* * * COMMUNICATION RESULT REPORT (AUG.19.2002 8:55AM) * * *

TTI WOLVERINE GASKET

FILE	MODE	OPTION	ADDRESS (GROUP)	RESULT	PAGE
596	MEMORY TX		17349531544	OK	P. 9/9

REASON FOR ERROR
E-1) HANG UP OR LINE FAIL
E-2) BUSY
E-3) NO ANSWER
E-4) NO FACSIMILE CONNECTION

FACSIMILE TRANSMISSION
WOLVERINE GASKET DIVISION
INKSTER, MICHIGAN
FAX: 313/562-8248

TO: MI DEQ

Date: Monday, August 19, 2002

ATTN: **Mr. Jim Ferritto**
Fax: 734/953-1544
FROM: Douglas Rommeck

Number of pages including cover: 9

SUBJECT: Eagle Picher Automotive-Wolverine Gasket Division, Inkster

---

Mr. Ferritto,

Table 1. Summary of Groundwater Elevation Data, Eagle-Picher Automotive Group, Wolverine Gasket Division, Inkster, Michigan.

Well Designation		Well TOC Elevation (ft)	Total Depth (ft BTOC)	Depth to Water (ft BTOC)	Groundwater Elevation (ft)
MW-1	5/11/1999	100.50	12.71	0.04	100.46
	2/2/2000			--	--
	7/27/2000			1.75	98.75
	11/13/2000			0.30	100.20
	5/22/2001			0.00	100.50
	1/14/2002			0.25	100.25
	9/27/2002			--	--
	11/11/2002			2.31	98.19
	12/12/2002			--	--
MW-2	5/11/1999	103.62	13.45	3.46	100.16
	2/2/2000			4.38	99.24
	7/27/2000			4.86	98.76
	11/13/2000			3.26	100.36
	5/22/2001			3.05	100.57
	1/14/2002			3.24	100.38
	9/27/2002			5.89	97.73
	11/11/2002			4.89	98.73
	12/12/2002			4.94	98.68
MW-3	5/11/1999	103.44	11.95	3.15	100.29
	2/2/2000			4.06	99.38
	7/27/2000			4.77	98.67
	11/13/2000			2.86	100.58
	5/22/2001			3.79	99.65
	1/14/2002			2.90	100.54
	9/27/2002			5.87	97.57
	11/11/2002			4.90	98.54
	12/12/2002			4.82	98.62
MW-4	5/11/1999	103.47	12.90	3.18	100.29
	2/2/2000			4.10	99.37
	7/27/2000			4.76	98.71
	11/13/2000			3.03	100.44
	5/22/2001			2.82	100.65
	1/14/2002			2.98	100.49
	9/27/2002			5.85	97.62
	11/11/2002			4.87	98.60
	12/12/2002			4.86	98.61

See notes on page 3.

MI0012605

Table 1. Summary of Groundwater Elevation Data, Eagle-Picher Automotive Group, Wolverine Gasket Division, Inkster, Michigan.

Well Designation		Well TOC Elevation (ft)	Total Depth (ft BTOC)	Depth to Water (ft BTOC)	Groundwater Elevation (ft)
MW-5	5/11/1999	101.42	35.65	23.53	77.89
	2/2/2000			23.73	77.69
	7/27/2000			23.44	77.98
	11/13/2000			23.09	78.33
	5/22/2001			23.00	78.42
	1/14/2002			23.19	78.23
	9/27/2002			22.92	78.50
	11/11/2002			23.33	78.09
	12/12/2002			23.33	78.09
MW-6	5/11/1999	101.34	3.61	1.21	100.13
	2/2/2000			2.24	99.10
	7/27/2000			2.75	98.59
	11/13/2000			0.36	100.98
	5/22/2001			1.36	99.98
	1/14/2002			1.34	100.00
	9/27/2002			2.71	98.63
	11/11/2002			2.59	98.75
	12/12/2002			3.00	98.34
MW-7	5/11/1999	100.53	5.80	1.67	98.86
	2/2/2000			2.29	98.24
	7/27/2000			2.19	98.34
	11/13/2000			1.05	99.48
	5/22/2001			0.87	99.66
	1/14/2002			1.53	99.00
	9/27/2002			0.60	99.93
	11/11/2002			1.03	99.50
	12/12/2002			2.60	97.93
MW-8	11/11/2002	101.78	11.12	8.60	93.18
	12/12/2002			8.65	93.13
MW-9	11/11/2002	100.39	11.63	--	--
	12/12/2002			2.40	97.99

See notes on page 3.

Table 1. Summary of Groundwater Elevation Data, Eagle-Picher Automotive Group, Wolverine Gasket Division, Inkster, Michigan.

Well Designation		Well TOC Elevation (ft)	Total Depth (ft BTOC)	Depth to Water (ft BTOC)	Groundwater Elevation (ft)
MWO-1	5/11/1999	104.15	8.71	3.61	100.54
	2/2/2000			4.61	99.54
	7/27/2000			5.34	98.81
	11/13/2000			3.68	100.47
	5/22/2001			3.66	100.49
	1/14/2002			3.05	101.10
	9/27/2002			6.71	97.44
	11/11/2002			5.90	98.25
	12/12/2002			5.64	98.51
MWO-2	5/11/1999	103.52	8.75	3.05	100.47
	2/2/2000			4.02	99.50
	7/27/2000			4.75	98.77
	11/13/2000			3.11	100.41
	5/22/2001			3.10	100.42
	1/14/2002			3.62	99.90
	9/27/2002			6.11	97.41
	11/11/2002			5.33	98.19
	12/12/2002			5.00	98.52
MWO-3	5/11/1999	103.97	8.78	3.49	100.48
	2/2/2000			4.43	99.54
	7/27/2000			5.21	98.76
	11/13/2000			3.46	100.51
	5/22/2001			3.22	100.75
	1/14/2002			3.32	100.65
	9/27/2002			6.34	97.63
	11/11/2002			5.21	98.76
	12/12/2002			5.34	98.63

Notes:

-- Water level was not measured.
ft BTOC Feet below top of casing.
TOC Top of casing, based on relative datum of 100.0 feet established at Wolverine Gasket Plant

Table 2. Soil Analytical Results, Wolverine Gasket Division, Inkster, Michigan.

Soil Boring Identification Depth of Sample Date	MW-8 7'-8' 11/11/2002	MW-9 7'-8' 11/11/2002	SB-10 8'-9' 11/11/2002	Drinking Water Protection Criteria	Groundwater/ Surface-water Interface Protection Criteria	Groundwater Contact Criteria	Soil Volatilization to Indoor Air Criteria	Direct Contact Criteria
Benzene	<50	**35,000**	<50	**100**	**4,000**	220,000	**8,400**	400,000
Chlorobenzene	**3,800**	**42,000**	<50	**2,000**	**940**	260,000	**990**	390,000
1,1-Dichloroethane	91	<50	<50	50,000	ID	890,000	430,000	890,000
Ethylbenzene	<50	**1,400**	<50	1,500	**360**	140,000	140,000	140,000
Toluene	<50	<50	<50	16,000	2,800	250,000	250,000	250,000
Total Xylenes	<150	<150	<150	5,600	700	150,000	150,000	150,000

Notes:

BOLD Exceeds criteria.

Cleanup criteria published in the Operational Memorandum #18, Part 201 of PA 451, Jone 2000.
Concentrations are in micrograms per kilogram.

Table 3. Groundwater Analytical Results, Wolverine Gasket Division, Inkster, Michigan.

Well Identification Date	MW-8 11/11/2002	MW-9 11/11/2002	Drinking Water Criteria	Groundwater/ Surface-water Criteria	Groundwater Volatilization to Indoor Air	Groundwater Contact Criteria	Flammability/ Explosivity Screening Level
Benzene	**16**	**47,000**	**5**	**200**	**36,000**	**11,000**	**34,000**
Chlorobenzene	**370**	**7,600**	**100**	**47**	470,000	86,000	79,000
1,1-Dichloroethane	59	ND	2,500	ID	2,300,000	2,400,000	190,000
Ethylbenzene	12	**110**	**74**	**18**	170,000	170,000	22,000
Toluene	6.6	<1.0	790	140	530,000	530,000	31,000
Total Xylenes	**50**	**250**	280	**35**	190,000	190,000	35,000

Notes:

BOLD Exceeds criteria.

Cleanup criteria published in the Operational Memorandum #18, Part 201 of PA 451, Jone 2000.
Concentrations are in micrograms per liter.

	Unit Type	Number of Units	Unit Cost	Extended Cost	+/- Uncertainty	Source
Groundwater - Aggressive Option						
Pre-Installation						
Civil Engineering and Design	lump sum	1	$4,500	$4,500	20%	
Mechanical Engineering and Design	lump sum	1	$3,500	$3,500	20%	
Electrical Engineering and Design	lump sum	1	$2,000	$2,000	20%	
Air Discharge Permiting (by Wolverine)	lump sum	1	$0	$0	0%	
Water Discharge Permiting	lump sum	1	$3,000	$3,000	15%	
Subtotal				**$13,000**	**19%**	
Installation						
Civil Mob/Demob	lump sum	1	$2,500	$2,500	10%	ESS
Disconnect Existing Injection Trench	lump sum	1	$500	$500	5%	ESS
Extend Withdrawal Trench						
Trenching	lump sum	1	$9,000	$9,000	10%	ESS
Piping and Backfill	lump sum	1	$7,500	$7,500	15%	ESS
Install Sump, Pump, and Connect	lump sum	1	$5,000	$5,000	15%	ESS
Install New Injection Trench & Connect						
Trenching	lump sum	1	$7,500	$7,500	10%	ESS
Piping & Backfill	lump sum	1	$7,000	$7,000	15%	ESS
Connection to Injection Trench	lump sum	1	$1,000	$1,000	10%	ESS
Connection to Sewer	lump sum	1	$1,000	$1,000	20%	
Trench Dewatering	lump sum	1	$5,000	$5,000	50%	
Install Asphalt	lump sum	1	$6,500	$6,500	20%	ESS
Building Construction (12' x 12')	lump sum	1	$10,000	$10,000	20%	
Procure Air Stripper	each	1	$5,000	$5,000	10%	
Procure Vapor Phase Carbon Units (1,000 lbs)	each	2	$3,500	$7,000	25%	
Procure Electrical Controls	lump sum	1	$2,000	$2,000	20%	
Mechanical Installation/Modification						
Labor	lump sum	1	$4,000	$4,000	20%	
Materials	lump sum	1	$1,000	$1,000	10%	
Electrical Installation/Modification						
Labor	lump sum	1	$3,000	$3,000	20%	
Materials	lump sum	1	$1,000	$1,000	10%	
Power Drop	lump sum	1	$3,500	$3,500	20%	
Subtotal				**$89,000**	**18%**	
System Startup (1st month)						
Labor	lump sum	1	$3,000	$3,000	20%	
Expenses	lump sum	1	$1,000	$1,000	20%	
Peroxide Costs	lump sum	1	$300	$300	5%	
Air Sample Analysis	each	6	$200	$1,200	10%	
Water Discharge Sample Analysis (1st)	each	1	$1,000	$1,000	10%	
Water Discharge Sample Analysis	each	3	$250	$750	10%	
Vapor Phase Carbon	lump sum	0	$1,000	$0	25%	
Reporting	lump sum	1	$1,000	$1,000	15%	
Subtotal				**$8,250**	**15%**	
Monthly OM&M (average per month)						
Routine OM&M						
Labor	lump sum	1	$500	$500	20%	
Expenses	lump sum	1	$150	$150	10%	
Peroxide Costs	lump sum	1	$100	$100	5%	
Air Sample Analysis	lump sum	1	$200	$200	10%	
Water Discharge Sample Analysis	lump sum	1	$250	$250	20%	
Vapor Phase Carbon - Purchase/Dispose	lump sum	1	$600	$600	25%	
Non-Routine O&M						
Labor	lump sum	1	$100	$100	20%	
Expenses	lump sum	1	$100	$100	20%	
Reporting	lump sum	1	$500	$500	15%	
Subtotal				**$2,500**	**18%**	
Total for Option (with 1 year OM&M)				**$140,250**	**±**	**$25,070**
Injection Well Option (replaces injection trench option)						
Install New Injection Wells & Connect						
Well Install	each	8	$500	$4,000	20%	
Trenching	feet	200	$20	$4,000	20%	
Labor	lump sum	1	$2,000	$2,000	20%	
Revised Total for Aggressive Option				**$134,750**		

	Unit Type	Number of Units	Unit Cost	Extended Cost	+/- Uncertainty	Source
Soil - SVE Stockpile						
Pre-Installation						
Civil Engineering and Design	lump sum	1	$2,500	$2,500	20%	
Mechanical Engineering and Design	lump sum	1	$2,500	$2,500	20%	
Electrical Engineering and Design	lump sum	1	$1,000	$1,000	20%	
Air Discharge Permiting (by Woverine)	lump sum	1	$0	$0	0%	
Misc	lump sum	0	$0	$0	0%	
Subtotal				**$6,000**	**20%**	
Installation						
Add Trench Soils to Stockpile	lump sum	1	$1,000.00	$1,000	10%	ESS
Install SVE Trenches						
Trenching	lump sum	1	$2,100	$2,100	15%	ESS
Horizontal Well Installation & Backfill	lump sum	1	$2,500	$2,500	15%	ESS
Connect and Pipe Wells to Building	lump sum	1	$1,200	$1,200	10%	ESS
Install Liner CAP, Soil Cover, and Seed	lump sum	1	$3,500	$3,500	20%	ESS
Building Addition Construction	lump sum	1	$2,000	$2,000	20%	
Procure SVE Pump Station (blower,tank,controls)	each	1	$3,500	$3,500	20%	
Procure Vapor Phase Aqueous Carbon	each	2	$0	$0	0%	
Procure Manifold & Abovegrade Piping	each	1	$1,000	$1,000	10%	
Procure Additional Electrical Controls	lump sum	1	$1,000	$1,000	25%	
Mechanical Installation						
Labor	lump sum	1	$1,500	$1,500	20%	
Materials	lump sum	1	$1,000	$1,000	10%	
Electrical Installation						
Labor	lump sum	1	$1,000	$1,000	20%	
Materials	lump sum	1	$500	$500	10%	
Power Drop	lump sum	1	$1,000	$1,000	20%	
Subtotal				**$22,800**	**17%**	
System Startup (1st Month)						
Labor	lump sum	1	$100	$100	20%	
Expenses	lump sum	1	$50	$50	20%	
Air Sample Analysis	each	0	$200	$0	0%	
Vapor Phase Carbon	lump sum	1	$300	$300	20%	
Reporting	lump sum	1	$200	$200	15%	
Subtotal				**$650**	**18%**	
Monthly OM&M (per month)						
Routine OM&M						
Labor	lump sum	1	$100	$100	20%	
Expenses	lump sum	1	$50	$50	10%	
Air Sample Analysis	lump sum	0	$100	$0	20%	
Vapor Phase Carbon - Purchase/Dispose	lump sum	1	$300	$300	25%	
Non-Routine O&M						
Labor	lump sum	1	$50	$50	20%	
Expenses	lump sum	1	$50	$50	20%	
Reporting	lump sum	1	$200	$200	15%	
Subtotal				**$750**	**20%**	
Total for Option (with 1 year OM&M)				**$38,450**	**±**	**$7,030**

Passive w/no soil treatment

	Unit Type	Number of Units	Unit Cost	Extended Cost	+/- Uncertainty	Source
Groundwater - Passive Option						
Pre-Installation						
Civil Engineering and Design	lump sum	1	$3,500	$3,500	20%	
Mechanical Engineering and Design	lump sum	1	$3,500	$3,500	20%	
Electrical Engineering and Design	lump sum	1	$2,000	$2,000	20%	
Air Discharge Monitoring (by Wolverine)	lump sum	1	$0	$0	0%	
Water Discharge Permiting	lump sum	1	$3,000	$3,000	15%	
Subtotal				**$12,000**	**19%**	
Installation						
Civil Mob/Demob	lump sum	1	$2,000	$2,000	10%	ESS
Disconnect Existing Injection Trench	lump sum	1	$500	$500	5%	ESS
Install New Injection Trench & Connect						
Trenching	lump sum	1	$7,500	$7,500	10%	ESS
Piping and Backfill	lump sum	1	$7,000	$7,000	15%	ESS
Connection to Injection Trench	lump sum	1	$500	$500	5%	ESS
Connection to Sewer	lump sum	1	$1,000	$1,000	20%	
Install Asphalt	lump sum	1	$4,000	$4,000	20%	ESS
Trench Dewatering	lump sum	1	$5,000	$5,000	50%	
* Building Construction (12' x 12')	lump sum	1	$10,000	$10,000	20%	
Procure Air Stripper	each	1	$5,000	$5,000	10%	
Procure Vapor Phase Carbon Units (1,000 lb)	each	2	$3,500	$7,000	25%	
Procure Electrical Controls	lump sum	1	$2,000	$2,000	20%	
Mechanical Installation/Modification						
Labor	lump sum	1	$4,000	$4,000	20%	
Materials	lump sum	1	$1,000	$1,000	10%	
Electrical Installation/Modification						
Labor	lump sum	1	$3,000	$3,000	20%	
Materials	lump sum	1	$1,000	$1,000	10%	
Power Drop	lump sum	1	$3,000	$3,000	20%	
Subtotal				**$63,500**	**20%**	
System Startup (1st month)						
Labor	lump sum	1	$3,000	$3,000	20%	
Expenses	lump sum	1	$1,000	$1,000	20%	
Air Sample Analysis	each	6	$200	$1,200	10%	
Water Discharge Sample Analysis (1st)	each	1	$1,000	$1,000	10%	
Water Discharge Sample Analysis	each	3	$250	$750	10%	
Vapor Phase Carbon	lump sum	0	$1,000	$0	25%	
Reporting	lump sum	1	$1,000	$1,000	15%	
Subtotal				**$7,950**	**16%**	
						83,450
Monthly OM&M (average per month)						
Routine OM&M						
Labor	lump sum	1	$500	$500	20%	
Expenses	lump sum	1	$150	$150	10%	
Air Sample Analysis	lump sum	1	$200	$200	10%	
Water Discharge Sample Analysis	lump sum	1	$250	$250	20%	
Vapor Phase Carbon - Purchase/Dispose	lump sum	1	$600	$600	25%	
Non-Routine O&M						
Labor	lump sum	1	$100	$100	20%	
Expenses	lump sum	1	$100	$100	20%	
Reporting	lump sum	1	$500	$500	15%	
Subtotal				**$2,400**	**19%**	
Total for Option (with 1 year OM&M)				**$112,250**	**±**	**$21,295**

Cost to Convert to Assessing

Cost to aggressively maintain status QUO.

All Range

SCENARIOS

1. MAINTAIN EXISTING SYS.
2. GW - PASSIVE
3. GW - AGGRESSIVE
4. GW - PASSIVE / AGGRESSIVE
5. SOIL - SVE
6. SOIL - DISPOSAL
7. OXIDATION IN-PLACE (OOM $)

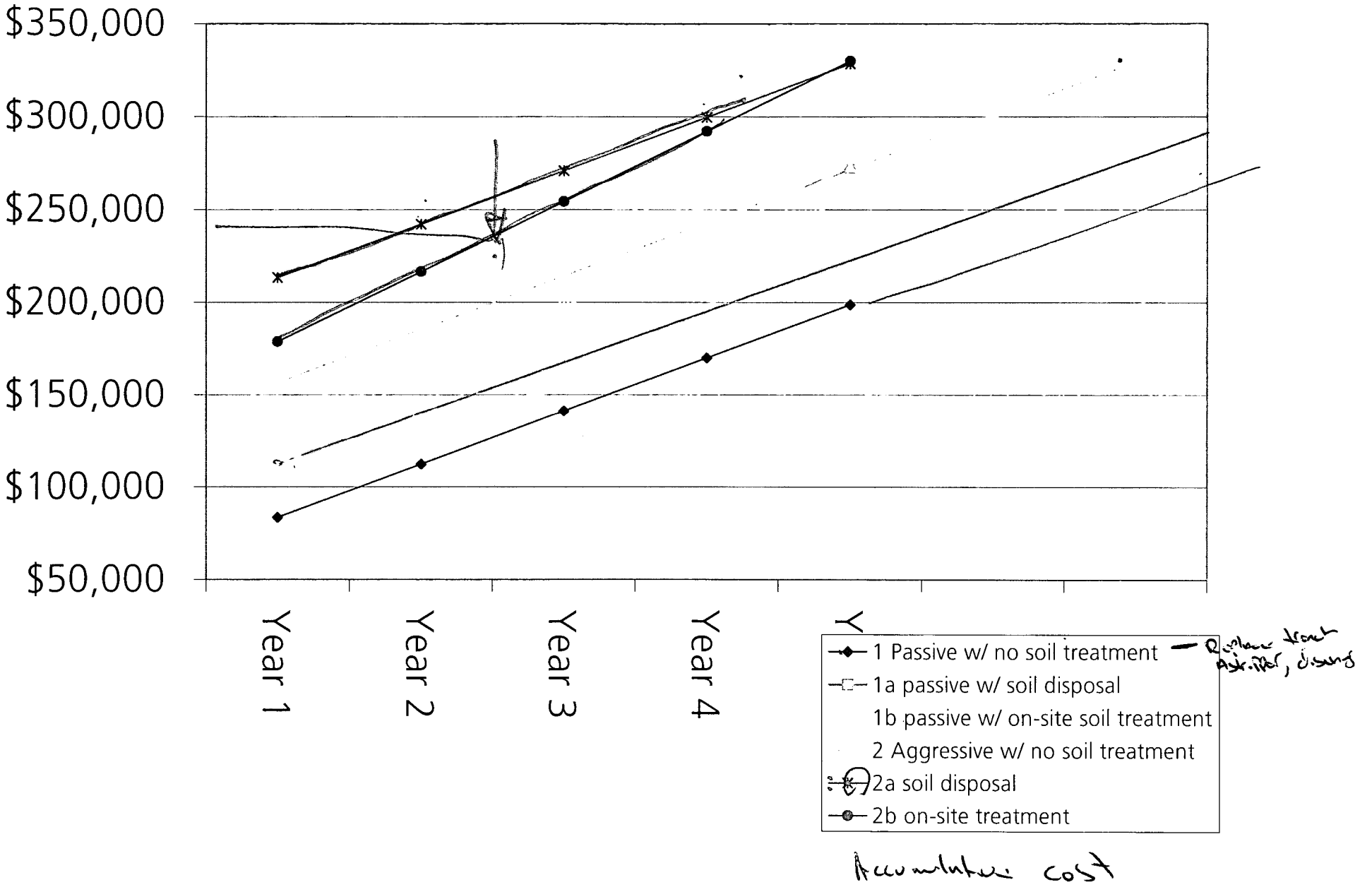
	Unit Type	Number of Units	Unit Cost	Extended Cost	+/- Uncertainty	Source
Groundwater - Aggressive Option						
Pre-Installation						
Civil Engineering and Design	lump sum	1	$4,500	$4,500	20%	
Mechanical Engineering and Design	lump sum	1	$3,500	$3,500	20%	
Electrical Engineering and Design	lump sum	1	$2,000	$2,000	20%	
Air Discharge Permiting (by Wolverine)	lump sum	1	$0	$0	0%	
Water Discharge Permiting	lump sum	1	$3,000	$3,000	15%	
Subtotal				**$13,000**	**19%**	
Installation						
Civil Mob/Demob	lump sum	1	$2,500	$2,500	10%	ESS
Disconnect Existing Injection Trench	lump sum	1	$500	$500	5%	ESS
Extend Withdrawal Trench						
Trenching	lump sum	1	$9,000	$9,000	10%	ESS
Piping and Backfill	lump sum	1	$7,500	$7,500	15%	ESS
Install Sump, Pump, and Connect	lump sum	1	$5,000	$5,000	15%	ESS
Install New Injection Trench & Connect						
Trenching	lump sum	1	$7,500	$7,500	10%	ESS
Piping & Backfill	lump sum	1	$7,000	$7,000	15%	ESS
Connection to Injection Trench	lump sum	1	$1,000	$1,000	10%	ESS
Connection to Sewer	lump sum	1	$1,000	$1,000	20%	
Trench Dewatering	lump sum	1	$5,000	$5,000	50%	
Install Asphalt	lump sum	1	$6,500	$6,500	20%	ESS
Building Construction (12' x 12')	lump sum	1	$10,000	$10,000	20%	
Procure Air Stripper	each	1	$5,000	$5,000	10%	
Procure Vapor Phase Carbon Units (1,000 lbs)	each	2	$3,500	$7,000	25%	
Procure Electrical Controls	lump sum	1	$2,000	$2,000	20%	
Mechanical Installation/Modification						
Labor	lump sum	1	$4,000	$4,000	20%	
Materials	lump sum	1	$1,000	$1,000	10%	
Electrical Installation/Modification						
Labor	lump sum	1	$3,000	$3,000	20%	
Materials	lump sum	1	$1,000	$1,000	10%	
Power Drop	lump sum	1	$3,500	$3,500	20%	
Subtotal				**$89,000**	**18%**	
System Startup (1st month)						
Labor	lump sum	1	$3,000	$3,000	20%	
Expenses	lump sum	1	$1,000	$1,000	20%	
Peroxide Costs	lump sum	1	$300	$300	5%	
Air Sample Analysis	each	6	$200	$1,200	10%	
Water Discharge Sample Analysis (1st)	each	1	$1,000	$1,000	10%	
Water Discharge Sample Analysis	each	3	$250	$750	10%	
Vapor Phase Carbon	lump sum	0	$1,000	$0	25%	
Reporting	lump sum	1	$1,000	$1,000	15%	
Subtotal				**$8,250**	**15%**	
Monthly OM&M (average per month)						
Routine OM&M						
Labor	lump sum	1	$500	$500	20%	
Expenses	lump sum	1	$150	$150	10%	
Peroxide Costs	lump sum	1	$100	$100	5%	
Air Sample Analysis	lump sum	1	$200	$200	10%	
Water Discharge Sample Analysis	lump sum	1	$250	$250	20%	
Vapor Phase Carbon - Purchase/Dispose	lump sum	1	$600	$600	25%	
Non-Routine O&M						
Labor	lump sum	1	$100	$100	20%	
Expenses	lump sum	1	$100	$100	20%	
Reporting	lump sum	1	$500	$500	15%	
Subtotal				**$2,500**	**18%**	
Total for Option (with 1 year OM&M)				**$140,250**	**±**	**$25,070**
Injection Well Option (replaces injection trench option)						
Install New Injection Wells & Connect						
Well Install	each	8	$500	$4,000	20%	
Trenching	feet	200	$20	$4,000	20%	
Labor	lump sum	1	$2,000	$2,000	20%	
Revised Total for Aggressive Option				**$134,750**		

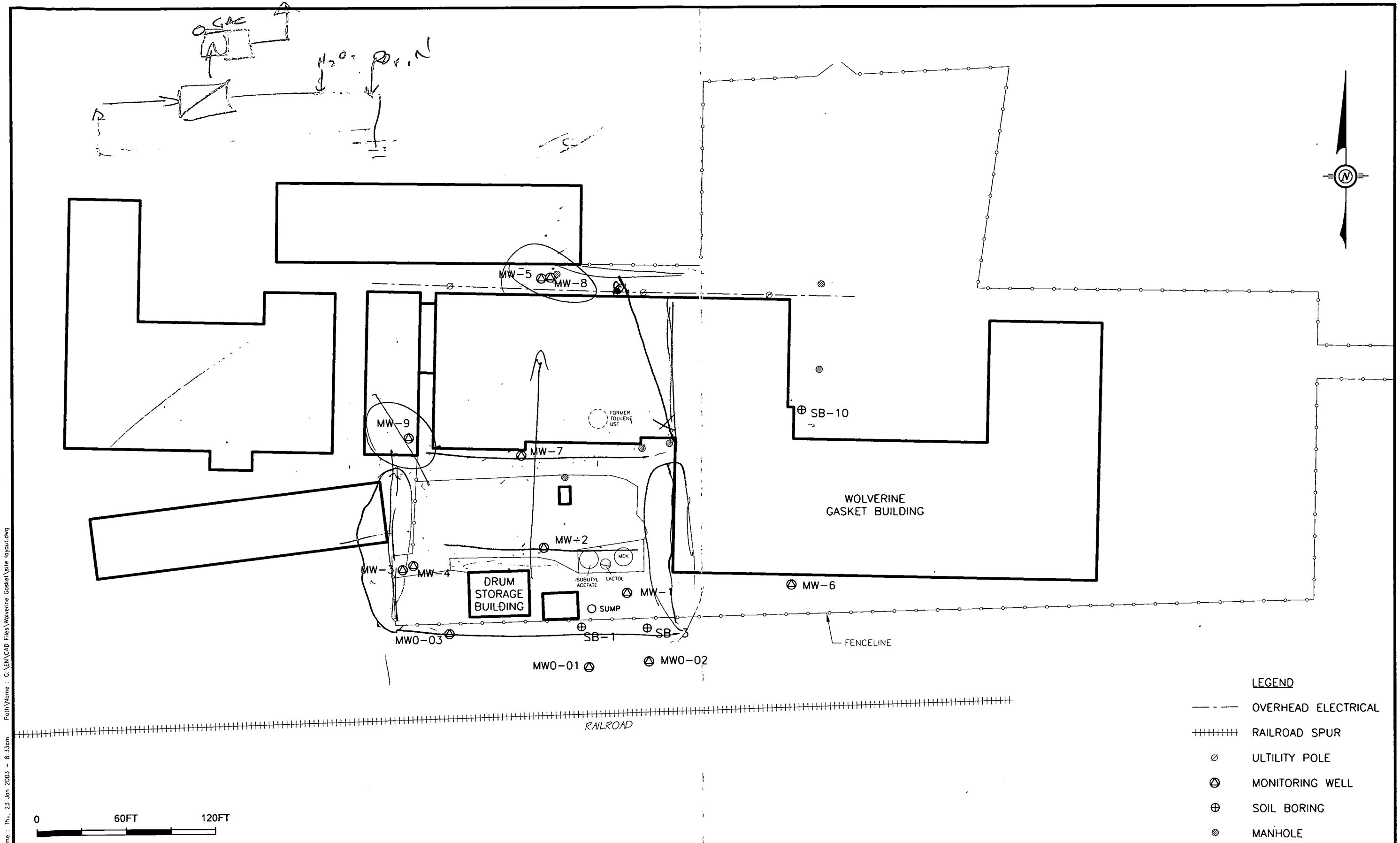
	Unit Type	Number of Units	Unit Cost	Extended Cost	+/- Uncertainty	Source
Soil - SVE Stockpile						
Pre-Installation						
Civil Engineering and Design	lump sum	1	$2,500	$2,500	20%	
Mechanical Engineering and Design	lump sum	1	$2,500	$2,500	20%	
Electrical Engineering and Design	lump sum	1	$1,000	$1,000	20%	
Air Discharge Permiting (by Woverine)	lump sum	1	$0	$0	0%	
Misc	lump sum	0	$0	$0	0%	
Subtotal				**$6,000**	**20%**	
Installation						
Add Trench Soils to Stockpile	lump sum	1	$1,000.00	$1,000	10%	ESS
Install SVE Trenches						
Trenching	lump sum	1	$2,100	$2,100	15%	ESS
Horizontal Well Installation & Backfill	lump sum	1	$2,500	$2,500	15%	ESS
Connect and Pipe Wells to Building	lump sum	1	$1,200	$1,200	10%	ESS
Install Liner CAP, Soil Cover, and Seed	lump sum	1	$3,500	$3,500	20%	ESS
Building Addition Construction	lump sum	1	$2,000	$2,000	20%	
Procure SVE Pump Station (blower,tank,controls)	each	1	$3,500	$3,500	20%	
Procure Vapor Phase Aqueous Carbon	each	2	$0	$0	0%	
Procure Manifold & Abovegrade Piping	each	1	$1,000	$1,000	10%	
Procure Additional Electrical Controls	lump sum	1	$1,000	$1,000	25%	
Mechanical Installation						
Labor	lump sum	1	$1,500	$1,500	20%	
Materials	lump sum	1	$1,000	$1,000	10%	
Electrical Installation						
Labor	lump sum	1	$1,000	$1,000	20%	
Materials	lump sum	1	$500	$500	10%	
Power Drop	lump sum	1	$1,000	$1,000	20%	
Subtotal				**$22,800**	**17%**	
System Startup (1st Month)						
Labor	lump sum	1	$100	$100	20%	
Expenses	lump sum	1	$50	$50	20%	
Air Sample Analysis	each	0	$200	$0	0%	
Vapor Phase Carbon	lump sum	1	$300	$300	20%	
Reporting	lump sum	1	$200	$200	15%	
Subtotal				**$650**	**18%**	
Monthly OM&M (per month)						
Routine OM&M						
Labor	lump sum	1	$100	$100	20%	
Expenses	lump sum	1	$50	$50	10%	
Air Sample Analysis	lump sum	0	$100	$0	20%	
Vapor Phase Carbon - Purchase/Dispose	lump sum	1	$300	$300	25%	
Non-Routine O&M						
Labor	lump sum	1	$50	$50	20%	
Expenses	lump sum	1	$50	$50	20%	
Reporting	lump sum	1	$200	$200	15%	
Subtotal				**$750**	**20%**	→ 750 x 12
Total for Option (with 1 year OM&M)				**$38,450**	**±**	**$7,030**

Cnl EG

	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7
1 Passive w/ no soil treatment	$83,450	$112,250	$141,050	$169,850	$198,650		
1a passive w/ soil disposal	$156,450	$185,250	$214,050	$242,850	$271,650	$300,450	$329,250
1b passive w/ on-site soil treatment	$121,900	$159,700	$197,500	$235,300	$273,100		
2 Aggressive w/ no soil treatment	$140,250	$169,050	$197,850	$226,650	$255,450		
2a soil disposal	$213,250	$242,050	$270,850	$299,650	$328,450		
2b on-site treatment	$178,700	$216,500	$254,300	$292,100	$329,900		

MI0012616


$350,000
$300,000
$250,000
$200,000
$150,000
$100,000
$50,000
Year 1
Year 2
Year 3
Year 4
1 Passive w/ no soil treatment
1a passive w/ soil disposal
1b passive w/ on-site soil treatment
2 Aggressive w/ no soil treatment
2a soil disposal
2b on-site treatment
Accumulative cost



User Name : Tyrbrough Date\Time : Thu, 23 Jan 2003 - 8:33am Path\Name : C:\EM\CAD Files\Wolverine Gasket\site layout.dwg

ARCADIS

25200 TELEGRAPH ROAD
SOUTHFIELD, MICHIGAN 48034
TEL: 248.936.8000 FAX: 248.936.8111

SITE LAYOUT MAP
EAGLE-PICHER AUTOMOTIVE GROUP
WOLVERINE GASKET DIVISION
INKSTER, MICHIGAN

DATE	PROJECT MANAGER	DRAWING FILE
08-JAN-03	J. QUINNAN	site layout
DRAWN	LEAD DESIGN PROF.	CHECKED
TRY		K. WILSON
PROJECT NUMBER		FIGURE NUMBER
MI000745.0003		2

MI00012618

	Unit Type	Number of Units	Unit Cost	Extended Cost	+/- Uncertainty	Source
Soil - SVE Stockpile						
Pre-Installation						
Civil Engineering and Design	lump sum	1	$2,500	$2,500	20%	
Mechanical Engineering and Design	lump sum	1	$2,500	$2,500	20%	
Electrical Engineering and Design	lump sum	1	$1,000	$1,000	20%	
Air Discharge Permiting (by Woverine)	lump sum	1	$0	$0	0%	
Misc	lump sum	0	$0	$0	0%	
Subtotal				**$6,000**	**20%**	
Installation						
Add Trench Soils to Stockpile	lump sum	1	$1,000.00	$1,000	10%	ESS
Install SVE Trenches						
Trenching	lump sum	1	$2,100	$2,100	15%	ESS
Horizontal Well Installation & Backfill	lump sum	1	$2,500	$2,500	15%	ESS
Connect and Pipe Wells to Building	lump sum	1	$1,200	$1,200	10%	ESS
Install Liner CAP, Soil Cover, and Seed	lump sum	1	$3,500	$3,500	20%	ESS
Building Addition Construction	lump sum	1	$2,000	$2,000	20%	
Procure SVE Pump Station (blower,tank,controls)	each	1	$3,500	$3,500	20%	
Procure Vapor Phase Aqueous Carbon	each	2	$0	$0	0%	
Procure Manifold & Abovegrade Piping	each	1	$1,000	$1,000	10%	
Procure Additional Electrical Controls	lump sum	1	$1,000	$1,000	25%	
Mechanical Installation						
Labor	lump sum	1	$1,500	$1,500	20%	
Materials	lump sum	1	$1,000	$1,000	10%	
Electrical Installation						
Labor	lump sum	1	$1,000	$1,000	20%	
Materials	lump sum	1	$500	$500	10%	
Power Drop	lump sum	1	$1,000	$1,000	20%	
Subtotal				**$22,800**	**17%**	
System Startup (1st Month)						
Labor	lump sum	1	$100	$100	20%	
Expenses	lump sum	1	$50	$50	20%	
Air Sample Analysis	each	0	$200	$0	0%	
Vapor Phase Carbon	lump sum	1	$300	$300	20%	
Reporting	lump sum	1	$200	$200	15%	
Subtotal				**$650**	**18%**	
Monthly OM&M (per month)						9,000
Routine OM&M						
Labor	lump sum	1	$100	$100	20%	
Expenses	lump sum	1	$50	$50	10%	
Air Sample Analysis	lump sum	0	$100	$0	20%	
Vapor Phase Carbon - Purchase/Dispose	lump sum	1	$300	$300	25%	
Non-Routine O&M						
Labor	lump sum	1	$50	$50	20%	
Expenses	lump sum	1	$50	$50	20%	
Reporting	lump sum	1	$200	$200	15%	
Subtotal				**$750**	**20%**	
Total for Option (with 1 year OM&M)				**$38,450**	**±**	**$7,030**

39450
133,300

Passive

(28,800)

3 177,400

4 186,550

5 195,700

150,700

149,950

37,700

121,150

+ 750

MI0012620

	Year 1	Year 2	Year 3	Year 4
1 Passive w/ no soil treatment	$112,250	$141,050	$169,850	$198,650
1a passive w/ soil disposal	$185,250	$214,050	$242,850	$271,650
1b passive w/ on-site soil treatment	$150,700	$188,500	$217,300	$246,100
2 Aggressive w/ no soil treatment	$140,250	$169,050	$197,850	$226,650
2a soil disposal	$213,250	$242,050	$270,850	$299,650
2b on-site treatment	$178,700	$216,500	$245,300	$274,100

May 14th

Summary of site options

100 drum

Option	Estimated Installation Cost	Comments
Trench Replacement	$36,000	Plus O&M costs $700/month(peroxide and 1 check-up) 100,000 (7) Will require a longer treatment time Cannot waste any water to the sewer. Some additional tests should be run to optimize the system
→ upgrade Passive Option	$83,450	Plus O&M costs $2,400 per month 230,000 (5) Assumes wasting of water to the sewer ($750 of O&M cost and $1,000 of installation cost) System optimization will be done based on system O&M sampling
Aggressive Option	$110,250	Plus O&M costs of $2,500 per month $130,000 (3) Assumes wasting of water to the sewer ($750 of O&M cost and $1,000 of installation cost) System optimization will be done based on system O&M sampling
Upgrade from Passive to Aggressive	$50,300	O&M costs increase from $2,400 to $2,500 per month
Soil Disposal Costs	$73,500	From EQ cost estimate of 450 tons at $163 per ton
Chemical Oxidation	>$200,000	Not recommended due to safety concerns. High oxygen levels throughout the site High Temperatures in the subsurface We would need to do approximately $20,000 to $50,000 worth of testing to design the system The costs could escalate based on actual oxygen demand and could be as high as $500,000. Oxidation would be the fastest approach

Tolvine Investigate

ER DEQ
John Pawloski
→ 246/1720

MI0012622

97,250

	Unit Type	Number of Units	Unit Cost	Extended Cost	+/- Uncertainty	Source
Groundwater - Aggressive Option						
Pre-Installation						
Civil Engineering and Design	lump sum	1	$4,500	$4,500	20%	
Mechanical Engineering and Design	lump sum	1	$3,500	$3,500	20%	
Electrical Engineering and Design	lump sum	1	$2,000	$2,000	20%	
Air Discharge Permiting (by Wolverine)	lump sum	1	$0	$0	0%	
Water Discharge Permiting	lump sum	1	$3,000	$3,000	15%	
Subtotal				**$13,000**	**19%**	
Installation						
Civil Mob/Demob	lump sum	1	$2,500	$2,500	10%	ESS
Disconnect Existing Injection Trench	lump sum	1	$500	$500	5%	ESS
Extend Withdrawal Trench						
Trenching	lump sum	1	$9,000	$9,000	10%	ESS
Piping and Backfill	lump sum	1	$7,500	$7,500	15%	ESS
Install Sump, Pump, and Connect	lump sum	1	$5,000	$5,000	15%	ESS
Install New Injection Trench & Connect						
Trenching	lump sum	1	$7,500	$7,500	10%	ESS
Piping & Backfill	lump sum	1	$7,000	$7,000	15%	ESS
Connection to Injection Trench	lump sum	1	$1,000	$1,000	10%	ESS
Connection to Sewer	lump sum	1	$1,000	$1,000	20%	
Trench Dewatering	lump sum	1	$5,000	$5,000	50%	
Install Asphalt	lump sum	1	$6,500	$6,500	20%	ESS
Building Construction (12' x 12')	lump sum	1	$10,000	$10,000	20%	
Procure Air Stripper	each	1	$5,000	$5,000	10%	
Procure Vapor Phase Carbon Units (1,000 lbs)	each	2	$3,500	$7,000	25%	
Procure Electrical Controls	lump sum	1	$2,000	$2,000	20%	
Mechanical Installation/Modification						
Labor	lump sum	1	$4,000	$4,000	20%	
Materials	lump sum	1	$1,000	$1,000	10%	
Electrical Installation/Modification						
Labor	lump sum	1	$3,000	$3,000	20%	
Materials	lump sum	1	$1,000	$1,000	10%	
Power Drop	lump sum	1	$3,500	$3,500	20%	
Subtotal				**$89,000**	**18%**	
System Startup (1st month)						
Labor	lump sum	1	$3,000	$3,000	20%	
Expenses	lump sum	1	$1,000	$1,000	20%	
Peroxide Costs	lump sum	1	$300	$300	5%	
Air Sample Analysis	each	6	$200	$1,200	10%	
Water Discharge Sample Analysis (1st)	each	1	$1,000	$1,000	10%	
Water Discharge Sample Analysis	each	3	$250	$750	10%	
Vapor Phase Carbon	lump sum	0	$1,000	$0	25%	
Reporting	lump sum	1	$1,000	$1,000	15%	
Subtotal				**$8,250**	**15%**	
Monthly OM&M (average per month)						
Routine OM&M						
Labor	lump sum	1	$500	$500	20%	
Expenses	lump sum	1	$150	$150	10%	
Peroxide Costs	lump sum	1	$100	$100	5%	
Air Sample Analysis	lump sum	1	$200	$200	10%	
Water Discharge Sample Analysis	lump sum	1	$250	$250	20%	
Vapor Phase Carbon - Purchase/Dispose	lump sum	1	$600	$600	25%	
Non-Routine O&M						
Labor	lump sum	1	$100	$100	20%	
Expenses	lump sum	1	$100	$100	20%	
Reporting	lump sum	1	$500	$500	15%	
Subtotal				**$2,500**	**18%**	
Total for Option (with 1 year OM&M)				**$140,250**	**±**	**$25,070**
Injection Well Option (replaces injection trench option)						
Install New Injection Wells & Connect						
Well Install	each	8	$500	$4,000	20%	
Trenching	feet	200	$20	$4,000	20%	
Labor	lump sum	1	$2,000	$2,000	20%	
Revised Total for Aggressive Option				**$134,750**		

	Unit Type	Number of Units	Unit Cost	Extended Cost	+/- Uncertainty	Source
Groundwater - Passive Option						
Pre-Installation						
Civil Engineering and Design	lump sum	1	$3,500	$3,500	20%	
Mechanical Engineering and Design	lump sum	1	$3,500	$3,500	20%	
Electrical Engineering and Design	lump sum	1	$2,000	$2,000	20%	
Air Discharge Monitoring (by Wolverine)	lump sum	1	$0	$0	0%	
Water Discharge Permiting	lump sum	1	$3,000	$3,000	15%	
Subtotal				**$12,000**	**19%**	
Installation						
Civil Mob/Demob	lump sum	1	$2,000	$2,000	10%	ESS
Disconnect Existing Injection Trench	lump sum	1	$500	$500	5%	ESS
Install New Injection Trench & Connect						
Trenching	lump sum	1	$7,500	$7,500	10%	ESS
Piping and Backfill	lump sum	1	$7,000	$7,000	15%	ESS
Connection to Injection Trench	lump sum	1	$500	$500	5%	ESS
Connection to Sewer	lump sum	1	$1,000	$1,000	20%	
Install Asphalt	lump sum	1	$4,000	$4,000	20%	ESS
Trench Dewatering	lump sum	1	$5,000	$5,000	50%	
Building Construction (12' x 12')	lump sum	1	$10,000	$10,000	20%	
Procure Air Stripper	each	1	$5,000	$5,000	10%	
Procure Vapor Phase Carbon Units (1,000 lb)	each	2	$3,500	$7,000	25%	
Procure Electrical Controls	lump sum	1	$2,000	$2,000	20%	
Mechanical Installation/Modification						
Labor	lump sum	1	$4,000	$4,000	20%	
Materials	lump sum	1	$1,000	$1,000	10%	
Electrical Installation/Modification						
Labor	lump sum	1	$3,000	$3,000	20%	
Materials	lump sum	1	$1,000	$1,000	10%	
Power Drop	lump sum	1	$3,000	$3,000	20%	
Subtotal				**$63,500**	**20%**	
System Startup (1st month)						
Labor	lump sum	1	$3,000	$3,000	20%	
Expenses	lump sum	1	$1,000	$1,000	20%	
Air Sample Analysis	each	6	$200	$1,200	10%	
Water Discharge Sample Analysis (1st)	each	1	$1,000	$1,000	10%	
Water Discharge Sample Analysis	each	3	$250	$750	10%	
Vapor Phase Carbon	lump sum	0	$1,000	$0	25%	
Reporting	lump sum	1	$1,000	$1,000	15%	
Subtotal				**$7,950**	**16%**	
Monthly OM&M (average per month)						
Routine OM&M						
Labor	lump sum	1	$500	$500	20%	
Expenses	lump sum	1	$150	$150	10%	
Air Sample Analysis	lump sum	1	$200	$200	10%	
Water Discharge Sample Analysis	lump sum	1	$250	$250	20%	
Vapor Phase Carbon - Purchase/Dispose	lump sum	1	$600	$600	25%	
Non-Routine O&M						
Labor	lump sum	1	$100	$100	20%	
Expenses	lump sum	1	$100	$100	20%	
Reporting	lump sum	1	$500	$500	15%	
Subtotal				**$2,400**	**19%**	
Total for Option (with 1 year OM&M)				**$112,250**	**±**	**$21,295**

	Unit Type	Number of Units	Unit Cost	Extended Cost	+/- Uncertainty	Source
Groundwater - Passive Option						
Pre-Installation						
Civil Engineering and Design	lump sum	1	$3,500	$3,500	20%	
Mechanical Engineering and Design	lump sum	1	$3,500	$3,500	20%	
Electrical Engineering and Design	lump sum	1	$2,000	$2,000	20%	
Air Discharge Monitoring (by Wolverine)	lump sum	1	$0	$0	0%	
Water Discharge Permiting	lump sum	1	$3,000	$3,000	15%	
Subtotal				**$12,000**	**19%**	
Installation						
Civil Mob/Demob	lump sum	1	$2,000	$2,000	10%	ESS
Disconnect Existing Injection Trench	lump sum	1	$500	$500	5%	ESS
Install New Injection Trench & Connect						
Trenching	lump sum	1	$7,500	$7,500	10%	ESS
Piping and Backfill	lump sum	1	$7,000	$7,000	15%	ESS
Connection to Injection Trench	lump sum	1	$500	$500	5%	ESS
Connection to Sewer	lump sum	1	$1,000	$1,000	20%	
Install Asphalt	lump sum	1	$4,000	$4,000	20%	ESS
Trench Dewatering	lump sum	1	$5,000	$5,000	50%	
Building Construction (12' x 12')	lump sum	1	$10,000	$10,000	20%	
Procure Air Stripper	each	1	$5,000	$5,000	10%	
Procure Vapor Phase Carbon Units (1,000 lb)	each	2	$3,500	$7,000	25%	
Procure Electrical Controls	lump sum	1	$2,000	$2,000	20%	
Mechanical Installation/Modification						
Labor	lump sum	1	$4,000	$4,000	20%	
Materials	lump sum	1	$1,000	$1,000	10%	
Electrical Installation/Modification						
Labor	lump sum	1	$3,000	$3,000	20%	
Materials	lump sum	1	$1,000	$1,000	10%	
Power Drop	lump sum	1	$3,000	$3,000	20%	
Subtotal				**$63,500**	**20%**	
System Startup (1st month)						
Labor	lump sum	1	$3,000	$3,000	20%	
Expenses	lump sum	1	$1,000	$1,000	20%	
Air Sample Analysis	each	6	$200	$1,200	10%	
Water Discharge Sample Analysis (1st)	each	1	$1,000	$1,000	10%	
Water Discharge Sample Analysis	each	3	$250	$750	10%	
Vapor Phase Carbon	lump sum	0	$1,000	$0	25%	
Reporting	lump sum	1	$1,000	$1,000	15%	
Subtotal				**$7,950**	**16%**	
Monthly OM&M (average per month)						
Routine OM&M						
Labor	lump sum	1	$500	$500	20%	
Expenses	lump sum	1	$150	$150	10%	
Air Sample Analysis	lump sum	1	$200	$200	10%	
Water Discharge Sample Analysis	lump sum	1	$250	$250	20%	
Vapor Phase Carbon - Purchase/Dispose	lump sum	1	$600	$600	25%	
Non-Routine O&M						
Labor	lump sum	1	$100	$100	20%	
Expenses	lump sum	1	$100	$100	20%	
Reporting	lump sum	1	$500	$500	15%	
Subtotal				**$2,400**	**19%**	
Total for Option (with 1 year OM&M)				**$112,250**	**±**	**$21,295**

ARCADIS

Infrastructure, buildings, environment, communications

ARCADIS G&M of Michigan, LLC
25200 Telegraph Road
Southfield
Michigan 48034
Tel 248 936 8000
Fax 248 936 8111
www.arcadis-us.com

ENVIRONMENTAL

Douglas Rommeck, CHMM
Eagle-Picher Automotive Group
Wolverine Gasket Division
2638 Princess Street
Inkster, Michigan 48141

Subject:
Proposal to Design a Replacement Injection Trench for the Remedial System Located at the Wolverine Gasket Facility in Inkster, Michigan.

Date:
August 19, 2003

Contact:
Kevin Wilson

Phone:
(248) 936-8708

Email:
kwilson@arcadis-us.com

Our ref:
MI000745.0006

Dear Mr. Rommeck:

ARCADIS is pleased to present this proposal to redesign the injection trench for the groundwater remediation system located at the Wolverine Gasket facility in Inkster, Michigan.

Scope of Work

ARCADIS will conduct the following activities:

- Design and prepare design drawings for a replacement infiltration trench for the existing groundwater treatment system.
    - The trench will be designed to function initially as an infiltration trench and will be connected to the existing groundwater treatment system.
    - The design will include features that will enable the trench to be used as a withdrawl trench and also for expansion.
    - Design drawings will include details related to the new trench construction and specify materials to be used.
- Prepare limited bid documents and solicit bids to construct the trench as designed.
    - Assumes bid specifications to consist of design drawings and summary of activities to be completed.

- Assumes coordination and management of the bid process including responses to design questions.
- Assumes that one pre-bid meeting will be held at the site.

- Provide suitable oversight of the trench construction to verify that it is installed meeting the design specifications.
  - Assumes trench installation will be completed within a three day period.

ARCADIS understands that Wolverine Gasket will hold the contract and pay the contractor directly for the trench installation work.

Fees

These tasks will be conducted on a time and materials basis according to the Fee Schedule provided in the April 26, 1999 Services Agreement. The costs associated with the time and materials tasks are estimated to be $12,800 and are outlined in the attached cost breakdown table.

Schedule

The design activities will begin immediately upon authorization to proceed and are expected to require approximately two weeks to complete. The bidding process will require approximately three weeks to complete. The installation of the trench is expected to be completed within a one week period. It is ARCADIS understanding that Wolverine Gasket intends to have the trench designed, installed, and operational by the middle of October 2003.

Use or disclosure of information contained on this sheet is subject to the restriction and disclaimer located on the signature page of this document.

ARCADIS

Douglas Rommeck
August 19, 2003

ARCADIS appreciates the opportunity to be of service to Wolverine Gasket in this matter, if you have any questions or concerns regarding this cost estimate please contact either of the undersigned at (248) 936-8000.

Sincerely,
ARCADIS G&M of Michigan, LLC

Kevin R. Wilson
Staff Geologist

Robert A. Ferree, CPG
Vice President

This proposal and its contents shall not be duplicated, used, or disclosed—in whole or in part—for any purpose other than to evaluate the proposal. This proposal is not intended to be binding or form the terms of a contract. The scope and price of this proposal will be superseded by the contract. If this proposal is accepted and a contract is awarded to ARCADIS as a result of—or in connection with—the submission of this proposal, ARCADIS and/or the client shall have the right to make appropriate revisions of its terms, including scope and price, for purposes of the contract. Further, client shall have the right to duplicate, use, or disclose the data contained in this proposal only to the extent provided in the resulting contract.

P:\EN\Common\Eagle Picher\Proposals\Trench Redesign.doc

ARCADIS

Table 1. Trench Redesign and Installation, Cost Breakdown by Task; Wolverine Gasket Facility, Inkster, Michigan.

Activity	Labor Category	2003 Budget Items					
		Labor Hours	Labor Rate	Labor Cost	Non-Labor Charges		Total Budget
					Contractor	Expenses	
Task 00001	Principal Engineer	6	$ 142	$ 852	$ -	$ 288	
Trench Redesign	Senior Engineer	4	$ 121	$ 484			
Design Drawings	Project Engineer	12	$ 105	$ 1,260			
Bid specifications	Staff Engineer	32	$ 90	$ 2,880			
Bidder Coordination	Engineer II	0	$ 76	$ -			
Bid Meeting	Drafter	16	$ 65	$ 1,040			
	Administrative Support	4	$ 44	$ 176			$ 6,980
Task 00002	Principal Engineer	0	$ 142	$ -	$ -	$ 592	
Trench Installation	Senior Engineer	0	$ 121	$ -			
	Project Engineer	4	$ 105	$ 420			
	Staff Engineer	4	$ 90	$ 360			
	Engineer I	40	$ 59	$ 2,360			
	Drafter	0	$ 65	$ -			
	Administrative Support	2	$ 44	$ 88			$ 3,820
Task 000PL	Principal Engineer	1	$ 142	$ 71	$ -	$ 6	
Planning	Senior Engineer	1	$ 121	$ 61			
	Project Engineer	1	$ 105	$ 105			
	Staff Engineer	1	$ 90	$ 45			
	Engineer I	0	$ 59	$ -			
	Drafter	0	$ 65	$ -			
	Administrative Support	1	$ 44	$ 22			$ 310
Task 000PM	Principal Engineer	2	$ 142	$ 284	$ -	$ -	
Project Management	Senior Engineer	0	$ 121	$ -			
	Project Engineer	4	$ 105	$ 420			
	Engineer I	0	$ 59	$ -			
	Drafter	0	$ 65	$ -			
	Technical Editor	0	$ 65	$ -			
	Administrative Support	4	$ 44	$ 176			$ 880
Task 000QC	Principal Engineer	4	$ 142	$ 568	$ -	$ -	
Quality Control	Senior Engineer	2	$ 121	$ 242			
	Staff Engineer	0	$ 105	$ -			
	Engineer I	0	$ 59	$ -			
	Drafter	0	$ 65	$ -			
	Technical Editor	0	$ 65	$ -			
	Administrative Support	0	$ 44	$ -			$ 810
TOTAL		143		$ 11,914	$ -	$ 886	$ 12,800

MI0012629

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
SOUTHEAST MICHIGAN DISTRICT OFFICE

JENNIFER M. GRANHOLM
GOVERNOR

STEVEN E. CHESTER
DIRECTOR

JAN 31 2003

January 30, 2003

Mr. Doug Rommeck, CHMM
Eagle-Picher Automotive
2638 Princess Street
Inkster, Michigan 48141

Dear Mr. Rommeck:

SUBJECT: Groundwater Investigation and Remediation
Wolverine Gasket Facility
2638 Princess Street, Inkster, Wayne County, Michigan

I have reviewed the January 27, 2003 letter from your environmental consultant, ARCADIS of Southfield, Michigan regarding the proposed investigative and remedial activities at the subject facility. Thank you for providing a prompt submittal of upcoming action items to this office following our January 23, 2003 meeting.

The letter summarizes the action items that Wolverine Gasket will undertake at the site including: enhancing the existing groundwater treatment system, investigating the source of elevated benzene concentrations in groundwater in well MW-9, and assessing the location and orientation of subsurface utilities. It is my understanding that ARCADIS proposes to complete all of the proposed action items by July 31, 2003. I concur with ARCADIS' list of action items and the July 31 deadline for their completion. You are hereby authorized to proceed. Please provide a report documenting the results of each action item to this office by July 31, 2003.

As we discussed last week during our meeting, I will be transferring to the Department of Environmental Quality (DEQ) Cadillac District Office effective Monday, February 3, 2003. At that time, this project will be transferred to another DEQ project manager. I am unaware who that individual will be at this time, so in the event that you have any questions after tomorrow, please contact Mr. Steve Kitler at 734-953-1458.

Sincerely,

James J. Ferritto, Jr., Senior Geologist
Southeast Michigan District Office
Remediation and Redevelopment Division
734-953-1429

cc: Mr. Steven Kitler, DEQ

38980 SEVEN MILE ROAD • LIVONIA, MICHIGAN 48152-1006
www.michigan.gov • (734) 953-8905

Wolverine Gasket Division-Inkster Remediation Proposal

Remediation Options	Trench Replacement	Passive w/ no SVE	Passive w/SVE	Aggressive w/ no SVE	Aggressive w/ SVE	Stockpile Removal
Installation Cost	$36,000	$103,850	$112,900	$110,250	$139,700	$74,000
Annual O & M Cost	$8,400	$28,800	$37,800	$30,000	$39,000	0
Estimated Years of operation	7	5	5	3	3	0
Year 1 Total Cost	$44,400	$112,250	$150,700	$140,250	$178,700	$74,000
Year 2 Total Cost	$52,800	$141,050	$188,500	$170,250	$217,700	0
Year 3 Total Cost	$61,200	$169,850	$217,300	$200,250	$256,700	0
Total Cost of Option	$310,800	$227,450	$274,900	$200,250	$256,700	$74,000
% Budget Uncertainty	(+/-) 20%	(+/-) 20%	(+/-) 20%	(+/-) 20%	(+/-) 20%	(+/-) 15%

MI0012631

Wolverine Gasket Division-Inkster Remediation Option Summary

Trench Replacement

Optimize existing remediation system. Replace existing infiltration trench to accommodate volume of water with out allowing surface exposure. System would be engineered and installed to allow for future expansion or upgrade to additional remediation option. Inject of nutrients and oxygen would be engineered to achieve optimal conditions. This option would meet minimal MI DEQ requirements of having the system running with a written operating procedure.

Passive w/no SVE

Replace existing infiltration trench. Upgrade remediation system to include sanitary sewer discharge, air stripper and carbon unit. This option will obtain hydraulic control of groundwater and produce a "cleaner" infiltration stream back into the project. Reengineering the infiltration point to enhance biodegradation of the constituents of concern.

Passive w/ SVE

Identical to the above summary with an additional SVE unit constructed to enhance remediation of the soil overburden area on-site.

Aggressive w/ no SVE

Redesign the system to make the project a "closed loop" pump and treat/bioremediation unit. Infiltration trench would be enclosed with the withdraw piping along the perimeter. Water would be drawn from all four sides of the property, treating and injected back into the center of the property. This would cut in half the drawi time and increase oxygen content throughout the property. Increasing oxygen, enhance the breakdown of the constituents of concern.

Aggressive w/ SVE

Identical to the above summary with an additional SVE unit constructed to enhance remediation of the soil overburden area on-site.

Option	Installation Budget Proposal	Annual O & M Cost	Estimated Operational Years	Mangement Summary
Trench Replacement	$40,000	$8,500	7	Optimize existing system. Meet the minimal MI DEQ requirement of the system running. Allow for future upgrade to project to eliminate operational years.
Passive Option	$85,000	$29,000	5	Reengineer to enhance treatment.
Aggressive Option	$112,000	$30,000	3	Reengineer system to enhance treatment and cut operational years in half.
Upgrade from Passive to Aggressive	$52,000	$30,000		Option to upgrade from passive to aggressive proposal. All options will be implemented for future upgrades.
Soil Disposal	$75,000	0		Key to the project. Soil needs to be either disposed of or treatment engineered into design upgrades

Redo

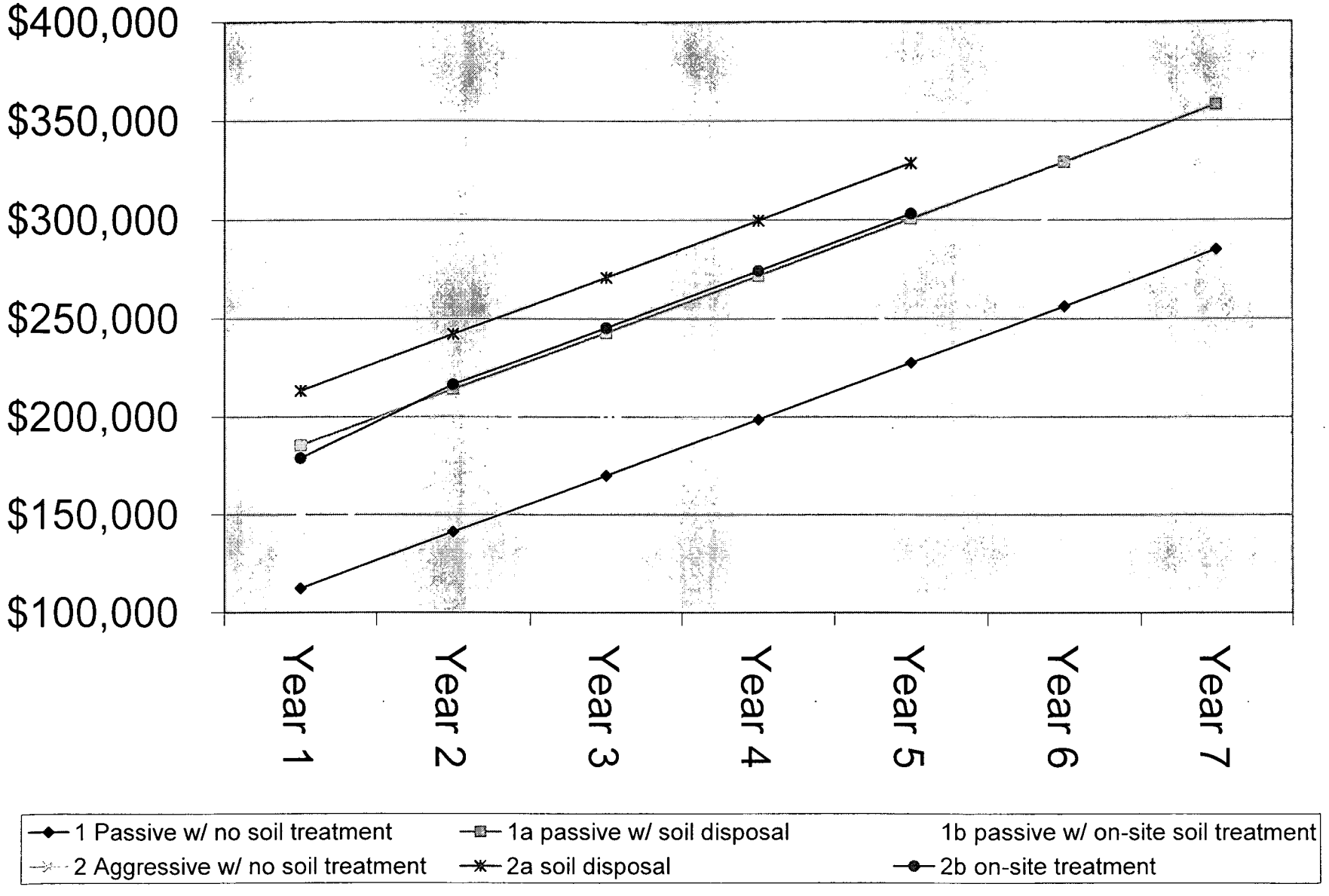
Wolverine Gasket Division-Inkster Remediation Proposal

Remediation Options	Trench Replacement	Passive w/ no SVE	Passive w/SVE	Aggressive w/ no SVE	Aggressive w/ SVE	Stockpile Removal
Installation Cost	$36,000	$103,850	$112,900	$110,250	$139,700	$74,000
Annual O & M Cost	$8,400	$28,800	$37,800	$30,000	$39,000	0
Estimated Years of operation	7	5	5	3	3	0
Year 1 Total Cost	$44,400	$112,250	$150,700	$140,250	$178,700	$74,000
Year 2 Total Cost	$52,800	$141,050	$188,500	$170,250	$217,700	0
Year 3 Total Cost	$61,200	$169,850	$217,300	$200,250	$256,700	0
Total Cost of Option	$310,800	$227,450	$274,900	$200,250	$256,700	$74,000
% Budget Uncertainty	(+/-) 20%	(+/-) 20%	(+/-) 20%	(+/-) 20%	(+/-) 20%	(+/-) 15%

MI0012634

	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7
1 Passive w/ no soil treatment	$112,250	$141,050	$169,850	$198,650	$227,450	$256,250	$285,050
1a passive w/ soil disposal	$185,250	$214,050	$242,850	$271,650	$300,450	$329,250	$358,050
1b passive w/ on-site soil treatment	$150,700	$188,500	$217,300	$246,100	$274,900	$303,700	$332,500
2 Aggressive w/ no soil treatment	$140,250	$169,050	$197,850	$226,650	$255,450		
2a soil disposal	$213,250	$242,050	$270,850	$299,650	$328,450		
2b on-site treatment	$178,700	$216,500	$245,300	$274,100	$302,900		

MI0012635


$400,000
$350,000
$300,000
$250,000
$200,000
$150,000
$100,000
Year 1
Year 2
Year 3
Year 4
Year 5
Year 6
Year 7
1 Passive w/ no soil treatment
1a passive w/ soil disposal
1b passive w/ on-site soil treatment
2 Aggressive w/ no soil treatment
2a soil disposal
2b on-site treatment

MI00126636

	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7
1 Passive w/ no soil treatment	$112,250	$141,050	$169,850	$198,650	$227,450	$256,250	$285,050
1a passive w/ soil disposal	$185,250	$214,050	$242,850	$271,650	$300,450	$329,250	$358,050
1b passive w/ on-site soil treatment	$150,700	$188,500	$217,300	$246,100	$274,900	$303,700	$332,500
2 Aggressive w/ no soil treatment	$140,250	$169,050	$197,850	$226,650	$255,450		
2a soil disposal	$213,250	$242,050	$270,850	$299,650	$328,450		
2b on-site treatment	$178,700	$216,500	$245,300	$274,100	$302,900		

Trench 44'400

37,800

~~517/849-9918~~

517/849-2017

Stacy Greene

171,100 (2)
208,900 (3)

MI0012637

Summary of site options

Option	Estimated Installation Cost	Comments
Trench Replacement	$36,000	Plus O&M costs $700/month(peroxide and 1 check-up) (7) Will require a longer treatment time Cannot waste any water to the sewer Some additional tests should be run to optimize the system
Passive Option	$83,450	Plus O&M costs $2,400 per month (5) Assumes wasting of water to the sewer ($750 of O&M cost and $1,000 of installation cost) System optimization will be done based on system O&M sampling
Aggressive Option	$110,250	Plus O&M costs of $2,500 per month (3) Assumes wasting of water to the sewer ($750 of O&M cost and $1,000 of installation cost) System optimization will be done based on system O&M sampling
Upgrade from Passive to Aggressive	$50,300	O&M costs increase from $2,400 to $2,500 per month
Soil Disposal Costs	$73,500	From EQ cost estimate of 450 tons at $163 per ton
Chemical Oxidation	>$200,000	Not recommended due to safety concerns. High oxygen levels throughout the site High Temperatures in the subsurface We would need to do approximately $20,000 to $50,000 worth of testing to design the system The costs could escalate based on actual oxygen demand and could be as high as $500,000. Oxidation would be the fastest approach

MI0012638

CONESTOGA-ROVERS
& ASSOCIATES

2055 Niagara Falls Blvd., Suite #3, Niagara Falls, NY 14304
Telephone: 716-297-6150 Facsimile: 716-297-2265
www.CRAworld.com

EaglePicher Automotive
2638 Princess Street
Inkster, MI. 48141

Attention: Mr. Doug Rommeck

Invoice # : 60850
Project : 035298
Project Name : Eagle-Picher - Feasibility Study
Invoice Group : **
Invoice Date : 03/18/2005
Purchase Order : 000324
Wolverine Project #04-104

TERMS: Net 30 Days. Service Charge of 1½% per month payable on overdue accounts.

For Professional Services Rendered through: 2/27/2005

Total Project Fee Authorized	120,000.00
Percent Complete as of 2/27/2005	25.00
Fee Earned To Date	30,000.00
Less Previous Billings	22,500.00
Current Billing Amount	7,500.00
Amount Due this Invoice	**7,500.00**

Tom Kinney

REMITTANCE ADDRESS
Conestoga-Rovers & Associates, Inc.
Department 406
P.O. Box 8000
Buffalo, NY 14267

EQUAL EMPLOYMENT OPPORTUNITY EMPLOYER

Eddie Gammold
814/883-3202

EaglePicher Automotive
Wolverine Division

EaglePicher Automotive Wolverine Gasket
2638 Princess Street
Inkster, MI 48141
Tel (313) 562-6400
Fax (313) 562-8248

Supp

Invoice	Supplier	Invoice Date	Due Date	PO	Shipper No	Discount Due Date	Discount Available	Amount	Balance	Status
49207	Conestoga	9/22/04	1/5/05	000324	49207		0.00	7,500.00	0.00	Fulfilled 219415
54318	Conestoga	12/14/04	1/20/05	001547	54318		0.00	363.56	0.00	Fulfilled 219830
55130	Conestoga	12/22/04	1/21/05	000324	55130		0.00	7,500.00	0.00	Fulfilled 219989
54390	Conestoga	12/14/04	2/21/05	001625	037950		0.00	454.24	0.00	Fulfilled 219989
56074	Conestoga	1/11/05	3/21/05	001765	56074		0.00	5,693.86	0.00	Fulfilled 220425
58780	Conestoga	2/17/05	3/21/05	001547	58780		0.00	107.00	0.00	Fulfilled 220425
58781	Conestoga	2/17/05	3/21/05	001757	58781		0.00	90.98	0.00	Fulfilled 220425
Invoice Count: 7						**Totals:**	**0.00**	**21,709.64**	**0.00**	

Plexus Online 6/17/05 3:17 PM cmcdaniel

Invoice Detail

Vendor Number 3453 CONESTOGA-ROVERS & ASSOC. Invoice Text NO
Invoice Number 45875 Description 04-104 toluene
P.O. Number
Hold Payment N Hold Reason
Voucher Number

Pay Next Run N
Bank Code 1
Discount Amount .00 Payment Code CHECKS
Amount Due .00 Selected for Payment N

Dates
Invoice 7/22/04
Entered 9/14/04
Discount 9/20/04
Due 9/20/04

Type	Posting Date	Transaction Amount	Discount Amount	Reference Number
INV	9/14/04	7500.00	.00	
PAY	9/21/04	7500.00-	.00	216931

F3=Exit F4=PO Inquiry F7=Fold F9=New Inquiry
F14=Text

EaglePicher Automotive
Wolverine Division

EaglePicher Automotive Wolverine Gasket
2638 Princess Street
Inkster, MI 48141
Tel (313) 562-6400
Fax (313) 562-8248

BLANKET PURCHASE ORDER 000324

Supplier: Conestoga-Rovers & Associates
14496 Sheldon Road
Suite 200
Plymouth, MI 48170
Phone: 734-453-5123
Fax: 734-453-5201

Attention: Thomas Kinney

Ship To: Wolverine Gasket Inkster
2638 Princess St.
Inkster, MI 48141

Bill To: Attn: Accounts Payable
2638 Princess Street
Inkster, MI 48141

PO No: 000324
PO Date: 5/10/04
Due Date:
PO Revision: 1
Revision Date: 9/8/04
Assigned Buyer: Melissa Countryman

Blanket Order: 5/1/04 - 4/30/09
Pymt Terms: Net 30 days
FOB: Other-Buyer defined
Freight Terms:
Note: CAPITAL PROJECT #04-104
Invoices as billed and approved by Ray Dewyer.

ITEMS

Item:Rel	Description	Status	Account	Due Date	Order Quantity	Unit Price	Setup Charge	Extended Price
1:0	Blanket Order to cover environmental and remediation services as outlined in proposal 35298 dated March 5, 2004 which is attached as exhibit A. Contract to cover tasks necessary to achieve remediational objective from May 1, 2004 through April 31, 2009. Completion of tasks at total billing less than above value will result in shared savings as follows: 10% to CRA and 90% to Wolverine. Budget tracking will be provided through CRA on a quarterly basis to Ray Dewyer. Costs for all tasks necessary to achieve remedial objective are to be invoiced on a lump sum basis. The total lump sum charges will be $120,000.00 and will be invoiced over a 5-year period. Lump sum payments of $7,500.00 will be due on a quarterly basis for the first three years. Payments will consist of 12 quarterly payments starting 30 days after the first injection and every three months thereafter for 3 years. Wolverine Project 04-104.	-	2190-01-00		12.00 Each	7,500.00/Each		
1:3		Planned	2190-01-00	6/30/04	1 Each	7,500.00/Each	0	7,500.00
1:1	Inkster Remediation Project	Firm	2190-01-00	9/30/04	1 Each	7,500.00/Each	0	7,500.00
1:2		Planned	2190-01-00	12/30/04	1 Each	7,500.00/Each	0	7,500.00
1:8		Planned	2190-01-00	3/30/05	1 Each	7,500.00/Each	0	7,500.00
1:9		Planned	2190-01-00	6/30/05	1 Each	7,500.00/Each	0	7,500.00
1:6		Planned	2190-01-00	9/30/05	1 Each	7,500.00/Each	0	7,500.00
1:7		Planned	2190-01-00	12/30/05	1 Each	7,500.00/Each	0	7,500.00

Plexus Online 9/8/04 2:19 PM tworniak

PURCHASE ORDER

EaglePicher Automotive
Wolverine Division

EaglePicher Automotive Wolverine Gasket
2638 Princess Street
Inkster, MI 48141
Tel (313) 562-6400
Fax (313) 562-8248

BLANKET PURCHASE ORDER 000324

ITEMS

Item:Rel	Description	Status	Account	Due Date	Order Quantity	Unit Price	Setup Charge	Extended Price
1:4		Planned	2190-01-00	3/30/06	1 Each	7,500.00/Each	0	7,500.00
1:5		Planned	2190-01-00	6/30/06	1 Each	7,500.00/Each	0	7,500.00
1:10		Planned	2190-01-00	9/30/06	1 Each	7,500.00/Each	0	7,500.00
1:11		Planned	2190-01-00	12/30/06	1 Each	7,500.00/Each	0	7,500.00
1:12		Planned	2190-01-00	3/30/07	1 Each	7,500.00/Each	0	7,500.00
				Total	**12**			**90,000.00**
2:0	The remaining 2 years will be invoiced at $3,750.00 per quarter, consisting of 8 quarterly payments.	-	2190-01-00		8.0 Each	3,750.00/Each		
2:1		Planned	2190-01-00	9/30/07	1 Each	3,750.00/Each	0	3,750.00
2:2		Planned	2190-01-00	12/30/07	1 Each	3,750.00/Each	0	3,750.00
2:3		Planned	2190-01-00	3/30/08	1 Each	3,750.00/Each	0	3,750.00
2:4		Planned	2190-01-00	6/30/08	1 Each	3,750.00/Each	0	3,750.00
2:5		Planned	2190-01-00	9/30/08	1 Each	3,750.00/Each	0	3,750.00
2:6		Planned	2190-01-00	12/30/08	1 Each	3,750.00/Each	0	3,750.00
2:7		Planned	2190-01-00	3/30/09	1 Each	3,750.00/Each	0	3,750.00
2:8		Planned	2190-01-00	6/30/09	1 Each	3,750.00/Each	0	3,750.00
				Total	**8**			**30,000.00**

Total: 120,000.00

NOTES

Melissa Courtigma

Attention Service Suppliers: By acceptance of this purchase order, you agree to conform to Eagle Picher safety policies and procedures.

This purchase order is subject to EaglePicher Automotive, Wolverine Gasket Division standard terms and conditions which are available at http://www.eaglepicher.com. If you are unable to locate this website or have difficulty retrieving the terms and conditions, please contact the issuer of this order.

Plexus Online 9/8/04 2:19 PM tworniak

PURCHASE ORDER

WOLVERINE GASKET DIVISION

A DIVISION OF EAGLE-PICHER INDUSTRIES, INC.

ORDER NUMBER 000324

THIS NUMBER MUST APPEAR ON ALL CORRESPONDENCE, INVOICES, SHIPPING PAPERS AND PACKAGES.

DATE REQUIRED	SHIP VIA	F.O.B.	TERMS	REQ. BY	DATE ISSUED
		Other-Buyer defined	Net 30 days	D. Rommeck	05/10/04

To

Conestoga-Rovers & Associates
14496 Sheldon Road, Suite 200
Plymouth, MI 48170
Attn: Thomas Kinney

SHIP TO

- [X] **INKSTER DIV.** 2638 PRINCESS ST., INKSTER, MI 48141 PHONE: 313-562-6400 • FAX: 313-562-8248
- [ ] **EAGLE-PICHER AUTOMOTIVE** 2424 JOHN DALY, INKSTER, MI 48141 PHONE: 313-278-5956 • FAX: 313-278-3546
- [ ] **BLACKSBURG DIV.** 201 INDUSTRIAL PARK RD. S.E., BLACKSBURG, VA 24060 PHONE: 540-552-7674 • FAX: 540-552-6082
- [ ] **LEESBURG DIV.** 10825 C.R. 44, LEESBURG, FL 34788 PHONE: 352-787-3015 • FAX: 352-728-3712
- [ ] **CEDAR RUN DIV.** 3175 STATE ST., BLACKSBURG, VA 24060 PHONE: 540-953-1742 • FAX: 540-961-2346

MAIL ALL INVOICES TO INKSTER OFFICE

SALES TAX
[ ] APPLIES [ ] DOES NOT APPLY INDUSTRIAL PROCESSING

[X] **NO TRUCK DELIVERIES WILL BE RECEIVED AFTER 3:00 P.M.**

PLEASE FURNISH THE MATERIAL SPECIFIED BELOW, SUBJECT TO TERMS AND CONDITIONS HEREIN NAMED, WHICH ARE A PART OF THIS CONTRACT.

QUANTITY	DESCRIPTION	PRICE
1 lt	Blanket order to cover environmental and remediation services as outlined in Proposal #35298 dated March 5, 2004, which is attached as Exhibit A.	$120,000.00/lt as outlined in payment schedule and Proposal.
	Contract to cover tasks necessary to achieve remediational objective from May 1, 2004 through April 31, 2009.	
	Completion of tasks at total billing less than above value will result in shared savings as follows: 10% to CRA and 90% to Wolverine. Budget tracking will be provided through CRA on a quarterly basis to Dewyer.	Invoiced as billed and approved by Ray Dewyer.
	Costs for all tasks necessary to achieve remedial objective are to be invoiced on a lump sum basis. The total lump sum charges will be $120,000.00 and will be invoiced overa 5-year period. Lump sum payments of $7,500.00 will be due on a quarterly basis for the first 3 years. Payments will consist of 12 quarterly payments starting 30 days after the first injection and every three months thereafter for 3 years.	
	The remaining 2 years will be invoiced at $3,750.00 per quarter, consisting of 8 quarterly payments. Reference Wolverine Project #04-104.	

CONFIRMING VERBAL ORDER TO: _____ ON: _____

ACCOUNT CLASS: 2000-1690-00 | FACTORY ORDER NUMBER: | BUYER: TW

MAIL INVOICES, AND ORIGINAL BILLS OF LADING, ORIGINAL EXPRESS RECEIPT ON DAY OF SHIPMENT. RENDER ALL INVOICES IN DUPLICATE. ALL SHIPMENTS MUST CONTAIN PACKING SLIPS.

ACKNOWLEDGE THIS ORDER PROMPTLY, GIVING DATE YOU INTEND TO MAKE SHIPMENT. NOTIFY US IMMEDIATELY IF UNABLE TO FILL ORDER AS SPECIFIED.

IF MATERIAL IS NOT IN ACCORDANCE WITH OUR SPECIFICATIONS, OR IS IN ANY WAY DEFECTIVE, IT WILL BE RETURNED TO YOU AT YOUR EXPENSE, PLUS ANY TRANSPORTATION CHARGES PAID BY US.

CONDITIONS

Wolverine Gasket Division reserves the right to cancel this order or any part thereof, if material is not shipped according to deliveries specified, or for causes due to any acts or demands of the United States Government, or to fires, strikes, or other causes beyond its control. Wolverine Gasket Division further reserves the right to cancel this order if material is not in accordance with blue prints, approved samples, or specifications, or is defective in workmanship or material, or is not satisfactory to them. If the terms and conditions stipulated herein do not meet with your approval, inform us promptly before making shipment, otherwise we will consider your acceptance of this order to have been made under the conditions named.

It is a condition of this order, and by filling it you will be deemed to have agreed thereto, that you will, at your own cost and expense, defend us from any and all suits for infringement of letters patent, copyright, and/or trade mark, which suit or suits result from the use or sale of any goods, devices, or apparatus sold and delivered to us under this order, and will indemnify and hold us harmless in any such suit or suits.

This order is placed by the purchaser with the understanding, and in accepting the seller agrees, that no Federal or State statute has been violated in the manufacture or sale of the items covered by this order.

Any invoices issued against this purchase order must contain the following certification: "We hereby certify that the goods covered by this invoice were produced in compliance with all applicable requirements of sections 6, 7, and 12 of the Fair Labor Standards Act, as amended, and of regulations and orders of the United States Department of Labor issued under section 14 thereof."

WOLVERINE GASKET DIVISION

PURCHASING AGENT

FORM 4MM 16124 REV. A

ORIGINAL

MI0012645

CONESTOGA-ROVERS
& ASSOCIATES

14496 Sheldon Road, Suite #200, Plymouth, MI 48170
Telephone: 734-453-5123 Facsimile: 734-453-5201
www.CRAworld.com

March 5, 2004

Reference No. 35298

Mr. Doug Rommeck
EaglePicher Automotive
2424 John Daly Road
Inkster, Michigan 48141

Dear Mr. Rommeck:

Re: Proposal for Professional Services
Remediation Services
EaglePicher Automotive
Wolverine Gasket Division
2638 Princess Street
Inkster, Michigan

Conestoga-Rovers & Associates, Inc. (CRA) is providing this Proposal for Professional Services (Proposal) to provide Remediation Services for EaglePicher Automotive (EaglePicher) for the facility located at 2638 Princess Street in Inkster, Michigan (Site). This proposal describes the work needed to remediate the Site to acceptable levels that will achieve EaglePicher's goals for the Site while complying with the applicable regulations.

Based on information obtained in the Site file review, elevated concentrations of benzene, toluene, ethylbenzene, and xylene (BTEX) and chlorobenzene were detected at levels above relevant cleanup criteria in soil and perched groundwater at the Site. To address the contamination, soil was excavated from a trench along the perimeter of the Site and groundwater extraction piping was installed in the trench. The trench was backfilled with imported gravel and the excavated soils were stockpiled on-Site. The soil pile is approximately 4 feet above ground surface, and contains approximately 1,100 cubic yards of impacted material (primarily sand and clay with some construction debris (broken concrete and asphalt). BTEX and chlorobenzene detected in the stockpiled soils were present at concentrations below relevant cleanup criteria except for toluene, which was detected at up to 1,300 milligrams per kilogram (mg/Kg). It is CRA's understanding that the portion of the soil pile appearing to contain the most elevated toluene levels was subsequently removed and disposed of off-Site as a "U-listed" waste. It is estimated that approximately 12 cubic yards of stockpiled soil were removed. The remaining stockpiled soils are considered to be a continuing source of impact to perched groundwater.

The perched water was collected from the recovery trench, pumped to a collection building north of well MW-2, supplemented with hydrogen peroxide and nutrients, and then re-injected into an infiltration gallery or "trench" located between the southern wall of the Wolverine

Gasket building (building) and the soil pile. This closed-loop treatment system was installed and operated in the early 1990's and shut down prior to 1999.

An underground pipeline going from the Lactol aboveground storage tank (AST) to the building had a documented release. The reports on file state that the Lactol consists of a mixture of constituents, with toluene and xylenes being the primary constituents. CRA performed an on-line review of MSDSs that indicate toluene is typically present at between 10 and 18 percent of Lactol spirits. The underground Lactol piping was removed and free product was pumped out of the excavation. The release from this Lactol pipeline appears to have been the source of the soil and groundwater contamination south of the building (and the source of contamination for the soil pile).

Additionally, an underground storage tank (UST) that reportedly contained toluene was removed in the early 1960's from beneath the building, but this area has not been investigated.

The depth to perched groundwater varies from approximately 0.5 to 1.5 feet. Groundwater is present in a shallow perched water-bearing zone that appears to flow to the north beneath the building. However, there is some localized perched groundwater flow to the south near the southern perimeter of the Site. Sandy soils are typically present within the upper 1.5 feet near the southern end of the building to 5.5 feet near the southern property line. Clays and silty clays are present beneath this surficial perched water-bearing sand and appear to be greater than 20 feet thick.

The known contamination is present primarily in the area south of the building and does not extend off-site to the south beyond the recovery trench (based on analytical from the three off-Site wells). However, benzene is present to the west of the building (MW-9) at greater concentrations (47 mg/l) than detected in any of the other existing monitoring wells. It is possible that the benzene detected near the western end of the Site is from an off-Site source. However, the extent of the BTEX (benzene) plume has not been delineated to the west and the source has not been clearly identified.

Elevated concentrations of chlorobenzene and BTEX have also been detected at well MW-8, north of the building. It is believed that these elevated detections are a result of groundwater migration and contaminant transport from the documented spill south of the building to the area north of the building (possibly via utility corridors).

This Proposal is presented in the following titled sections:

Section 1.0	Scope of Work
Section 2.0	Project Experience
Section 3.0	Project Team
Section 4.0	Cost Estimate
Section 5.0	Schedule

1.0 SCOPE OF WORK

This Scope of Work (SOW) has been prepared based on a review of EaglePicher's files and conversations between EaglePicher and CRA. The SOW will consist of the following tasks:

Task 1	Review and assessment of reports and Site information;
Task 2	Focused feasibility analysis;
Task 3	Preferred remedial alternatives

1.1 REVIEW AND ASSESSMENT OF REPORTS AND SITE INFORMATION

This initial document review to gain familiarity with the available materials has been performed ***at CRA's expense***. Subsequent analyses of the existing data and information has been utilized as the basis to perform a focused feasibility analysis and further refine the scope of work as described in Section 1.2.

1.2 FOCUSED FEASIBILITY ANALYSIS

The focused feasibility analysis evaluated the selection of remedial alternatives for treatment of the soil pile and the perched groundwater beneath the Site. Due to the undefined extent of perched groundwater contamination to the west and north, a limited additional site investigation is recommended prior to initiating the remedial activities. Any soil or groundwater contamination that may be present beneath the building is not being addressed at this time, and was not included in this analysis, as this area has not been investigated. The remedial alternatives assume that free product is not present on-Site.

The following remedial technologies were reviewed as part of the focused feasibility analysis and are further outlined in Table 1.

i) natural attenuation;

ii) enhanced bioremediation;

iii) excavation;

iv) biopile;

v) denitrification;

vi) biosparging;

vii) bioslurping;

viii) chemical oxidation; and

ix) soil vapor extraction.

1.3 PREFERRED REMEDIAL ALTERNATIVES

The technologies presented in Section 1.2 have been compared based on effectiveness, implementability, and cost. This comparison is provided in Table 1. Based on an evaluation of the technologies with respect to these considerations, enhanced bioremediation is the preferred remedial alternative for treatment of the perched groundwater. Additionally, CRA recommends that the soil pile either be assessed to determine if it is an on-going source to groundwater contamination, or be removed from the Site. The Site groundwater can only be effectively remediated if all on-going sources are eliminated. Additionally, the soil pile will have to be addressed in order to obtain closure from the Michigan Department of Environmental Quality (MDEQ) under Part 201 of PA 451.

STOCKPILED SOIL (SOIL PILE)

Based on a review of historical groundwater analytical results, the concentrations in the Site monitoring wells (MW-1 and MW-7) have undergone significant attenuation; however, the BTEX concentrations in the wells closest to the soil pile have not decreased (MW-2 and MW-3). This indicates that leaching from the soil pile appears to be a continuing source of contamination to the perched groundwater. Accordingly soil assessment is warranted.

CRA recommends collecting soil samples from the existing soil pile and/or the unsaturated soils immediately below the soil pile to evaluate whether the soil pile is a current contaminant source of the shallow perched groundwater. Based on a review of the data obtained from HA-1 through HA-5, collected within the soil pile, the most elevated VOC concentrations were present at the base of the soil pile or within the soils beneath the soil pile (the 4 to 5 foot sample interval). CRA will sample 10 locations utilizing a Geoprobe or hand-auger sampling method. The soils will be continuously sampled until groundwater is encountered, approximately 1-foot below ground surface (bgs). One sample will be collected from each location for laboratory testing of VOCs. The sample will be selected from the interval with the greatest field evidence of impact, based on visual, olfactory, and photoionization detector (PID) readings. If no significant impact is observed, the sample will be collected from the 2-foot interval straddling the base of the soil pile and the upper portion of the vadose zone soils.

The soil samples will be examined by a CRA geologist for soil type, moisture, color, visual and olfactory evidence of impact, and screened for total VOCs with a PID. Collected soils will be described and classified according to the Unified Soil Classification System (USCS).

CRA recommends proceeding with remediation of the perched groundwater if the results of the soil sampling indicate that the current levels of VOCs in the stockpiled soil are not an apparent threat to leach to perched groundwater at levels exceeding applicable industrial standards. If the VOC concentrations are elevated enough to cause continuing impact to the perched groundwater, then CRA does not recommend remediating the perched groundwater until the soil has been removed.

Soil removal involves the removal, transportation, and off-Site disposal of the stockpiled soil and the unsaturated soils beneath the stockpiled soil. This alternative would remove the "hot spot" soils, and would expedite the cleanup of site perched groundwater by eliminating a source of contamination. It is estimated that there are approximately 1,100 to 1,300 cubic yards of contaminated soil in the soil pile and the unsaturated soils beneath the pile.

The disposal requirements for the soil will depend on the source of the contamination and/or the physical characteristics of the soil. Based on CRA's review of the historical documentation, the Lactol pipeline release was the only documented source of contamination for the soil pile (soil pile came from a recovery trench excavation related to the Lactol pipeline release). Conversations with site personnel have indicated that the source of contamination may also be from a leaking UST that was previously removed which may have contained toluene and/or chlorobenzene. While toluene is a constituent in Lactol, chlorobenzene is not. Cholobenzene was identified in the soil pile at elevated concentrations. Therefore, Lactol does not appear to be the source of the chlorobenzene. However, there is no documentation to support that a UST was leaking chlorobenzene or that a release of chlorobenzene from other sources occurred. EPA

has specifically addressed situations like this and states: "Where a facility owner/operator makes a good faith effort to determine if a material is a listed hazardous waste but cannot make such a determination because documentation regarding a source of contamination, contaminant, or waste is unavailable or inconclusive, EPA has stated that one may assume the source, contaminant or waste is not listed hazardous waste, and therefore, provided the material in question does not exhibit a characteristic of hazardous waste, RCRA requirements do not apply." (USEPA, Management of Remediation Waste Under RCRA, October 14, 1998, EPA530-F-98-026) .

If there is no documentation that supports a release to the soil, other than the Lactol release, the contaminated soil would not be considered a U-listed hazardous waste. The soil would need to be sampled and analyzed Toxic Characteristics Leachate Procedure (TCLP) to determine if it is characteristically hazardous waste. Based on a review of the analytical results from HA-1 through HA-5, the soil does not appear to be a characteristic waste. A TCLP analysis of the soils will be completed prior to requesting landfill acceptance of the waste. A cost estimate has been provided assuming the soils can be disposed of as non-hazardous.

If the soil is a characteristically hazardous waste, the soil could be treated on-site (in tanks or containers) to remove the characteristic and treat the underlying hazardous constituents (UHCs) in accordance with the land disposal requirements (LDR). Treatment other than that conducted in tanks or containers (e.g., incineration, land treatment, or treatment in surface impoundments) would require a permit. On-site treatment in tanks and/or containers is likely to be more costly than excavation and off-site disposal as a hazardous waste. On-site treatment is also not a highly recommended option based on the fact that the material must all be rendered non-hazardous within 90 days; otherwise the facility would be in violation of RCRA for storing hazardous waste without a permit.

ENHANCED BIOREMEDIATION OF PERCHED GROUNDWATER

Prior to initiating perched groundwater remediation, CRA recommends limited additional site assessment to delineate the extent of groundwater contamination to the west of the Site, north of the building, beneath the soil pile, and immediately northeast of the soil pile. The assessment would consist of one day of exploration with a Geoprobe and up to 10 groundwater samples for volatile organic compounds (VOCs). A survey will be performed on the existing wells and the Geoprobe locations. The results of the limited site assessment activities would better define the area(s) where remedial efforts need to be concentrated.

Biodegradation in groundwater can be enhanced by addition of hydrogen peroxide. This can be accomplished through Geoprobe injection points across the Site. If necessary, nutrients can also be added or microbial inoculation can be performed to further enhance biodegradation

processes. If monitoring shows that conditions are anaerobic, nitrate and sulfate can be added; nitrate and sulfate would act as an electron acceptor for degradation of the various Site-specific contaminants through the denitrification and sulfate reduction processes.

It is assumed that the hydrogen peroxide will be injected into the saturated soils with up to 60 injection points spaced no more than 20 feet apart. CRA currently proposes that four applications of hydrogen peroxide will be performed. The first two applications will be applied within the first 6 months. The remaining applications will either be applied at 6-month intervals or annually, depending on the groundwater monitoring results. The existing monitoring wells MW-1, MW-2, MW-3, MW-7, MW-8, and MW-9 can be used for monitoring effectiveness of the treatment. An additional two or three monitoring wells may be required based on the delineation activities with the Geoprobe. CRA currently proposes that groundwater monitoring would be conducted from each of these wells on a quarterly basis. Additionally, once per year, the other four existing monitoring wells will be sampled (MW-6, MWO-01, MWO-02, and MWO-03). The samples will be analyzed for VOCs and limited natural attenuation parameters. The proposed timeframes and quantities for applications of hydrogen peroxide and groundwater monitoring intervals may change based on results and MDEQ requirements.

Fenton's Reagent solution can also be applied directly into injection points near MW-2 , MW-3, MW-7, and MW-9, where contaminant concentrations are highest. This will rapidly reduce contaminant concentrations at these locations via in-situ chemical oxidation. Once the concentrations are reduced, biodegradation can be enhanced by the injection of nutrients at these hot spot locations.

2.0 PROJECT EXPERIENCE

CRA's remedial treatment technology expertise has been demonstrated on a wide variety of projects at numerous facilities including Superfund sites, automotive manufacturing facilities, gasoline stations, chemical manufacturing facilities, coal-tar sites, railroad facilities, petroleum refineries, wood treatment facilities, and hazardous waste landfills. CRA has excelled at the design, construction, and operation of advanced biological, physical, and chemical treatment systems for industrial effluents and contaminated groundwater and soil. CRA can provide EaglePicher with a Statement of Qualifications outlining our experience with soil and groundwater remediation if you would like additional information regarding our capabilities.

CRA has developed an Innovative Technology Group (ITG) dedicated to the identification, development, evaluation, and application of innovative approaches for site remediation. The Group assists CRA Project Managers and external clients in reviewing Site conditions and recommending innovative technologies that may be potentially applicable to the Site.

CRA has a construction group that has extensive experience with remediation system installations and operation and maintenance. Utilization of our internal construction group allows us to provide turnkey operations with quicker systems installations and at substantial cost savings.

3.0 PROJECT TEAM

The Project Team will be comprised primarily of individuals from CRA's Plymouth, Michigan office. Various staff from this office have extensive experience providing site investigation, feasibility analysis, remediation system design, construction/installation, operation and maintenance, closure activities, and regulatory expertise.

The Project Team individuals have been selected from personnel who have successfully and effectively completed numerous remediation projects of similar size and nature as your project in Inkster, Michigan. Details on key project personnel are provided below:

Mr. Fred Blicke, P.E. - Senior Project Engineer/Principal-in-Charge - Mr. Blickle is a senior engineer and Principal with CRA. Mr. Blickle's professional experience spans over 20 years and encompasses all aspects of environmental engineering including remediation services, negotiation with regulatory agencies, expert testimony, and overall client representation. Mr. Blickle will ensure that the overall service level meets or exceeds EaglePicher's expectations.

Mr. Tom Kinney, CPG, CP - Project Manager - Mr. Kinney is a hydrogeologist/project manager with 20 years of hydrogeologic/environmental consulting experience. Mr. Kinney has experience with hydrogeologic investigations, remedial investigations/feasibility studies, remediation system installations, operation and maintenance, and closure activities for numerous automotive manufacturing facilities, gasoline stations, and other industrial facilities. Mr. Kinney will provide day-to-day coordination of the efforts of the Project Team and be responsible for reporting and communications with EaglePicher.

Mr. Alan Weston, Ph.D. - Innovative Technology Scientist - Dr. Weston is Director of the CRA Innovative Technology Group and has over 25 years of experience in hazardous waste site

remediation. Until July 1998, Dr. Weston was Director of Remedial Programs for Occidental Chemical Corporation (OxyChem), managing investigation and remediation at all OxyChem's active plant sites, including selection of remedial alternatives and treatability studies. While with CRA, Dr. Weston has designed numerous innovative remedial programs that have lead to successfull remediation projects.

Mr. Gary Klepper - Regulatory Specialist - Mr. Klepper has over 25 years of experience with the MDEQ and CRA. His most recent position with the MDEQ being Supervisor of the Southeastern Michigan District. He also spent 6 years as Site Assessment Unit Chief of the Groundwater Quality and Environmental Response Divisions in Jackson, Michigan. Mr. Klepper has a thorough understanding of MDEQ regulations and is familiar with many agency personnel that may have some oversight role for this project.

Other staff will be added to the Project Team as needed.

4.0 COST ESTIMATE

The initial document review to gain familiarity with the available materials (Task 1) was performed ***at CRA's expense***. CRA has performed a focused feasibility analysis and selected a preferred remedial alternative for the stockpiled soil and for the perched groundwater. CRA's cost estimate for the enhanced bioremediation of the perched groundwater is summarized below and detailed in Table 2.

Perched groundwater remediation	$120,000

The perched groundwater remediation can be accomplished without the removal of the stockpiled soil, however, further leaching of contaminants from the soil into the groundwater may prevent an effective perched groundwater remediation. The results of the soil pile sampling and one round of groundwater monitoring will allow CRA to evaluate the threat of further leaching of contaminants from the soil into the groundwater.

CRA's services for the perched groundwater remediation will be based on a Lump Sum amount of $120,000 to be paid over a 5-year period.

CRA will guarantee the cleanup of the perched groundwater to acceptable levels (below industrial criteria for direct contact, volatilization to indoor air, and flammability/explosivity) within 5-years, based on the following assumptions:

- Concentrations of toluene, chlorobenzene, or other VOCs do not continue to leach from the stockpiled soil to the perched water at levels above the applicable industrial criteria (this assumption is contingent upon the results of the proposed soil pile sampling and one round of groundwater monitoring) ;
- The extent of perched groundwater contamination is not greater than depicted by the prior consultants;
- No new releases occur;
- No off-Site sources of contamination migrate on-Site;
- No separate phase product is present; and
- The concentrations of contaminants below the building are not known, therefore, contaminant levels beneath the building cannot be guaranteed to be remediated to acceptable industrial criteria.

Closure reporting and any required closure verification sampling is not included in this cost estimate.

5.0 SCHEDULE

CRA will commence the Services described above upon written acceptance of this Proposal. CRA anticipates we will perform the soil pile evaluation, limited site assessment, one round of groundwater monitoring, and a survey of the existing groundwater monitoring wells and new Geoprobe sampling locations within one month of obtaining authorization to proceed. If the soil is not required to be removed from the Site, injections will begin within 2-months of obtaining authorization to proceed. Additional injections will be conducted every 6-months or annually for up to four injections. CRA anticipates that the known contamination in perched groundwater will be remediated to the applicable industrial criteria within 5-years or less. If EaglePicher requires a different schedule, CRA can adjust our schedule to meet your project goals.

CONESTOGA-ROVERS
& ASSOCIATES

We appreciate the opportunity to present this Proposal to EaglePicher. Please feel free to contact the undersigned at (734) 453-5123 should you require clarification or further information on any aspect of this Proposal.

Yours truly,

CONESTOGA-ROVERS & ASSOCIATES

Thomas M. Kinney, C.P.G.

Frederick W. Blickle, P.E.

TK/mw/2/PR/Det.
Encl.

c.c.: Tom Johnson, CRA

TABLE 1

SUMMARY OF POTENTIAL REMEDIAL TECHNOLOGIES
EAGLEPICHER AUTOMOTIVE
INKSTER, MICHIGAN

	Description	*Effectiveness*	*Implementability*	*Cost*
Natural Attenuation	Naturally occurring microorganisms metabolize contaminants into less toxic or nontoxic compounds. Takes place under aerobic or anaerobic conditions. Site conditions can be enhanced, if necessary, to speed up degradation.	***Soil Pile*** • Is not effective in treating high concentrations found in source areas, and will take long time frame for complete treatment. • Reaching cleanup criteria is uncertain without lab and pilot tests. ***Perched Water*** • Most effective in treating residual contamination and dissolved phase contaminants in perched water. • Reaching cleanup criteria is uncertain without lab and pilot tests.	• Easy to implement. • Relies on conventional construction methods and materials. Requires handling of non-toxic nutrients and/or microbial inoculates. • Could be applied to treat low contamination levels in both soil and perched water. • Nutrients could be injected directly into either soil or perched water to enhance NA. Additional injection wells/points and monitoring wells would be required. • Laboratory treatability study and pilot test would be required to further evaluate anticipated effectiveness/treatment duration.	Low
In situ Enhanced Bioremediation	Involves injection of nutrients and suitable electron acceptors and carbon/energy sources to enhance activity of naturally occurring microorganisms to metabolize contaminants into less toxic or nontoxic compounds. By-products are mainly carbon dioxide and water. Can take place under aerobic or anaerobic conditions.	***Soil Pile*** • Can be effective in treating moderate concentrations found in source areas, but may take long time frame for complete treatment. Frequent injections required. ***Perched Water*** • Most effective in treating residual contamination and dissolved phase contaminants in perched water.	• Easy to implement. • Relies on conventional construction methods and materials. Requires handling of non-toxic nutrients and/or microbial inoculates. • Could be applied to treat both soil and perched water. • Nutrients could be injected directly into either soil or perched water. Additional injection wells/points and monitoring wells would be required. • Laboratory treatability study and pilot test would be required to further evaluate anticipated effectiveness/treatment duration.	Low
Excavation and Disposal	Involves removal of contaminated soils and disposal off-Site in accordance with applicable rules and regulations	***Soil Pile*** • Effective in removing highly contaminated soils from Site. • Additional technology may be required to treat residual contamination. ***Perched Water*** • Not applicable. An additional treatment technology would be needed for treatment of perched water	• Easy to implement. • Relies on conventional construction methods and materials. • Could be applied concurrent with or subsequent to other technologies. • Continued liability issues.	High
Biopile	Treatment of contaminated soil by ex situ enhanced biodegradation processes. Microbial activities are stimulated by aeration and/or the addition of organic substrates, minerals, nutrients, and moisture.	***Soil Pile*** • Can be effective in treating high concentrations found in source areas, but may take long time frame for complete treatment. Frequent injections required. • Aerobic degradation stimulated by injection or extraction of air. • Effective for treatment of BTEX. ***Perched Water*** • Not effective for perched water treatment; therefore, a perched water remedy would be required.	• Easy to implement. • Relies on conventional construction methods and materials. Requires handling of non-toxic nutrients and/or microbial inoculates. • Air could be injected directly into the soil. • Laboratory treatability study and pilot test would be required to further evaluate anticipated effectiveness/treatment duration. • Low airflow rates can be used to reduce amount of vapor emissions generated. • Short treatment timeframe. • Laboratory treatability study and pilot test would be required to further evaluate anticipated effectiveness/treatment duration.	Low to Medium

MI0012657

TABLE 1

SUMMARY OF POTENTIAL REMEDIAL TECHNOLOGIES
EAGLEPICHER AUTOMOTIVE
INKSTER, MICHIGAN

Technology Type	*Description*	*Effectiveness*	*Implementability*	*Cost*
Denitrification	Biodegradation process whereby nitrate is used as electron acceptor to enhance microbial degradation.	***Soil Pile*** • Can be effective in treating BTEX and chlorobenzene under anaerobic conditions, but may take long time frame for complete treatment. Frequent injections required. ***Perched Water*** • Most effective in treating residual BTEX contamination and dissolved phase contaminants in perched water.	• Easy to implement if Site conditions are currently anaerobic. • Relies on conventional construction methods and materials. Requires handling of non-toxic nutrients and/or microbial inoculates. • Could be applied to treat both soil and perched water • Nitrate could be injected directly into either soil or perched water. Additional perched water injection wells/points and monitoring wells would be required. • Laboratory treatability study and pilot test would be required to further evaluate anticipated effectiveness/treatment duration.	Low to medium
In situ Biosparging	Injection of air/methane into perched water below level of contamination to enhance biodegradation. Oxygen is injected at low flow rates so that vapors are not generated in vadose zone	***Soil Pile*** • Not effective in treating the soil pile soils. ***Perched Water*** • Effective in treating dissolved phase contaminants in perched water. • An air or oxygen stream would be effective in enhancing aerobic conditions.	• Moderately easy to implement. • Relies on conventional construction methods and materials. • Operated at lower extraction rates than SVE systems. • No surface vapor treatment system required. • Laboratory treatability study and pilot test would be required to further evaluate anticipated effectiveness/treatment duration.	Low to Medium
Bioslurping	Involves vacuum extraction of perched water and vapor extraction to remove volatiles.	***Soil Pile*** • Not applicable. ***Perched Water*** • Effective in treating dissolved phase and light nonaqueous phase liquid (LNAPL) in perched water. • Promotes movement of air in unsaturated zone, thereby increasing oxygen content and enhancing aerobic biodegradation.	• Difficult to implement. • Relies on conventional construction methods and materials. • Recovered water and air would require on-Site treatment. • Treated water could be reinjected or discharged to storm or sanitary sewer. Permits may be required. • Laboratory treatability study and pilot test would be required to further evaluate anticipated effectiveness/treatment duration.	Medium to High
Chemical Oxidation	Application of oxidizing agents, via injection into soils or perched water at or above the level of contamination, that break carbon bonds in chlorinated compounds and converts them into nonhazardous compounds, primarily carbon dioxide and water.	***Soil Pile*** • Effective in treating high concentrations found in source areas. Would be effective in treating the soil pile. • May not be expected to achieve cleanup levels. NA may be required to treat residual contamination. ***Perched Water*** • Effective in treating dissolved phase contaminants in perched water. • Effective in treating residual contamination. • Oxidizing agents can temporarily adversely impact microbial population during treatment.	• Easy to implement. • Relies on conventional construction methods and materials. Requires handling of oxidizing agents. • Could be applied to treat both soil and perched water. • Additional injection points and monitoring wells would be required. • Laboratory treatability study and pilot test would be required to further evaluate anticipated effectiveness/treatment duration.	Medium
SVE	Injection of air into unsaturated soils below level of contamination to enhance biodegradation. Vapors are generated, percolate up through surface soils and are collected and treated by SVE system.	***Soil Pile*** • Effective in treating soil pile soils. • Silty clay soil matrix would reduce effectiveness of SVE. • Effective in treating residual contamination. ***Perched Water*** • Not effective for treatment of perched water.	• Moderately easy to implement. • Relies on conventional construction methods and materials. • Vapor treatment system required.	Medium

MI0012658

TABLE 2

COST ESTIMATE - PERCHED GROUNDWATER TREATMENT
EAGLEPICHER AUTOMOTIVE
INKSTER, MICHIGAN

Description	*Units*	*Quantity*	*Unit Price*	*Total*
Project Mgmt/Work Plan/HASP/QAPP/Engineering	LS	1	$ 8,000.00	$ 8,000.00
CRA Laboratory Testing (NA parameters)	LS	1	$ 5,000.00	$ 5,000.00
Geoprobe exploration & well installation(3)	LS	1	$ 4,500.00	$ 4,500.00
Equipment and Reagent Cost				
Supply of Hydrogen Peroxide	LS	1	$ 16,000.00	$ 16,000.00
Supply of Fertilizer and Nutrients	LS	1	$ 6,000.00	$ 6,000.00
Geoprobe Injections	LS	1	$ 22,000.00	$ 22,000.00
CRA Oversight(drilling & injections)	LS	1	$ 17,500.00	$ 17,500.00
Monitoring and Reporting (20 events)	LS	1	$ 20,000.00	$ 20,000.00
Analytical Laboratory	LS	1	$ 21,000.00	$ 21,000.00
		TOTAL COST		$ 120,000.00

CRA 35298Romm-2-T2D-PR

AGREEMENT

REMEDIATION OF PERCHED GROUNDWATER
WOLVERINE GASKET DIVISION
2638 PRINCESS STREET
INKSTER, MICHIGAN

Agreement made this ____ day of April, 2004, by and between EaglePicher Automotive (EaglePicher), hereinafter referred to as "The Owner" and CRA Incorporated, hereinafter referred to as the "Contractor".

Contractor is engaged in the business of providing environmental engineering and remediation services according to the nature of the Work requirements represented by The Owner, and has represented that these services include, without limitation, non-hazardous and hazardous site work, including but not limited to, engineering design, regulatory interaction, and site remediation services.

In consideration of the mutual covenants, terms, privileges, and obligations hereof and the mutual benefits to be derived here from, and intending to be legally bound hereby, the parties hereby agree as follows:

ARTICLE 1
SCOPE OF WORK

Contractor agrees to perform for The Owner, the services and Scope of Work (the "Work") detailed in Contractor's final proposal dated *March 5, 2004,* which is attached as Exhibit A and which is incorporated as part of this agreement.

ARTICLE 2
COMPENSATION

As full and complete compensation for the Work, The Owner shall pay Contractor, upon presentation of invoices, on the following basis:

1) Costs for all tasks necessary to achieve the remedial objective are to be invoiced on a lump sum basis. The total lump sum charges will be **$120,000.00** and will be invoiced over a 5-year period. Lump sum payments of $7,500.00 will be due on a quarterly basis for the first 3 years. Payments will consist of 12 quarterly payments starting 30 days after the first injection and every 3 months thereafter for 3 years. The remaining 2 years will be invoiced at $3,750.00 per quarter, consisting of 8 quarterly payments.

2) Completion of all tasks at a total billing cost of less than $120,000 will result in a bonus of 10 percent of the savings realized being paid to CRA. A budget tracking will be provided to EaglePicher on a quarterly basis.

MI0012660

ARTICLE 3
CONTRACTOR'S REPRESENTATIONS AND WARRANTIES

A. Professional Responsibility

Contractor represents and warrants that the services to be performed by it and its subcontractors hereunder shall be performed, and its findings obtained and prepared, in accordance with generally accepted practices and principles of the Environmental Remediation Industry. Contractor further represents and warrants that he is authorized and/or licensed to perform the Work hereunder and that all employees have been appropriately trained and instructed in accordance with applicable health and safety requirements. Upon request, Contractor will provide copies of such authorization, training records, and/or licenses.

B. Compliance with Laws

Contractor represents and warrants that it understands the current known hazards which are present to persons, property, and the environment in performing the Work specified hereunder and has developed the requisite expertise and training programs for undertaking such Work. Contractor further represents and warrants that it and its subcontractors shall perform all services hereunder in a safe manner and in compliance with applicable federal, state, and local laws, rules, regulations, and orders. In addition and not in derogation of the foregoing, Contractor represents and warrants that it and all its employees, agents, and subcontractors are and shall remain familiar with all applicable regulations issued by the Michigan Department of Environmental Quality (MDEQ), Occupational Safety and Health Administration (OSHA), and any other relevant federal, state, or local governmental bodies governing the performance of the scope of Work hereunder.

C. Conflict of Interest

Contractor represents, warrants, and confirms that neither Contractor nor any of Contractor's subcontractors has, or has had any commitment to perform services for others which conflict with the interest of The Owner or Contractor's obligations hereunder. Further, Contractor warrants that, for the duration of the services to be performed hereunder, Contractor will not propose to or enter into agreement that would conflict with the interest of The Owner or Contractor's obligations under this agreement.

D. Performance of Remedial Objective

Contractor warrants that its services in performing the scope of work will accomplish the remedial objective. Contractor guarantees the cleanup of the perched groundwater to acceptable levels (below industrial criteria for direct contact, volatilization to indoor air, and

MI0012661

flammability/explosivity) within 5-years, based on the assumptions detailed the final proposal (Exhibit A).

ARTICLE 4
CONTRACTOR RESPONSIBILITIES

A. Contractor will provide all supervision, labor, materials, tools, equipment, and subcontracted items necessary for the performance and completion of the Work.

B. Contractor shall be responsible for the payment of all taxes covering the services to be performed; including the payment of all applicable taxes covering its employees.

C. Contractor shall complete the Work in accordance with the scope presented in Exhibit A.

D. Contractor shall provide appropriate insurance for the Work as provided in Article 5.

E. Contractor shall notify The Owner if it is served notice of a violation of any law, ordinance, or regulation, which may affect and/or arise out of the performance of the Work.

ARTICLE 5
INSURANCE

Contractor shall carry at its expense and shall require all of its subcontractors to carry, during the term of this Agreement, the minimum insurance coverages set forth below:

Type	*Limits*
Workers' Compensation	Statutory
Comprehensive General Liability (including specific coverage for contractual liability, broad form property damage liability, and personal injury liability)	$5,000,000 each occurrence $5,000,000 aggregate
Employer's Liability Insurance	$500,000 each occurrence
Automobile Liability (covering vehicles owned, hired, or non-owned)	$1,000,000 each person
Bodily Injury	$1,000,000 each occurrence
Property Damage	$1,000,000 each occurrence
Environmental Impairment Liability	$5,000,000 each occurrence $5,000,000 aggregate.

MI0012662

Should the Owner require additional insurance or increased coverage, Contractor will secure such additional insurance with The Owner bearing the expense of such additions. General Liability Insurance shall include coverage for completed operations, contractual liability, and independent contractor coverage under this Agreement. Contractor agrees to furnish to The Owner, insurance certificate(s) reflecting Contractor's compliance with the requirements of this Article. Insurance certificate(s) for commercial general liability and environmental impairment liability shall name the Owner as an additional insured and contain an endorsement providing that the insurance will not be cancelled or changed for any reason whatsoever without the insurer first giving The Owner thirty (30) days prior written notice.

ARTICLE 6
CONFIDENTIALITY

Contractor and its employees, officers, agents, and directors shall treat The Work as confidential and proprietary to The Owner and shall not disclose to others during or subsequent to the term of this Agreement, except as is necessary to perform this Agreement (and then only on a confidential basis satisfactory to both parties), any information whether verbal or written, or any description whatsoever (including any technical information, computer data or programs, experience or data) regarding The Owner's plans, programs, plants, processes, products, costs, equipment, operations, or customers which may come within the knowledge of Contractor, its officers, or their employees in the performance of this Agreement, without in each instance securing the prior written consent of The Owner.

Contractor shall also treat as confidential and shall not disclose to others, except as required as law, information relating to the chemical composition and quantity of the materials contained in the facility.

Nothing contained within this Article shall prevent Contractor from disclosing to others or using in any manner information, which Contractor can show:

a. Has been published and has become part of the public domain other than by acts, omissions or fault of Contractor or its employees;
b. Has been furnished or made known to Contractor by third parties (other than those acting directly or indirectly for or on behalf of Contractor) as a matter of legal right without restrictions on its disclosure; or
c. Was in Contractor's possession prior to the disclosure thereof by The Owner to Contractor. Provided, however, Contractor shall not release, or cause or allow the release of, information to the communication media, except as required by law, concerning the existence of terms of this Agreement and its Exhibits, without in each instance securing the prior written consent of The Owner.

MI0012663

In the event that Contractor shall be required by subpoena, court, or administrative order (hereinafter "the Order") to disclose any of the information deemed by this Agreement to be confidential and/or proprietary, Contractor shall give immediate written notice to The Owner. Upon receipt of same, The Owner expressly reserve the right to interpose all objections it may have to the disclosure of its information. The foregoing obligations shall survive the termination or expiration of this Agreement and shall continue until a specific written release is given by The Owner.

For purposes of this Article, information means any handwritten, typewritten, printed, recorded, or graphic matter including computer-generated mediums, however produced or reproduced and regardless of whether created by Contractor, The Owner, or some other entity.

ARTICLE 7
INDEMNIFICATION

Contractor agrees to and shall indemnify, defend, and hold harmless, The Owner and its employees and agents from and against any and all claims, demands, causes, penalties, losses, damages, expenses, and other liabilities of any kind (including but not limited to reasonable attorney's fees, court costs, and other expenses related thereto) caused by, arising out of, or attributable to the negligent act or omission or reckless or willful misconduct of Contractor, its subcontractors, agents, or employees in performing the Work under this Agreement,

ARTICLE 8
INDEPENDENT CONTRACTOR

At all times, Contractor and its subcontractors, shall be considered independent contractor. Contractor and its subcontractors are not, and shall not hold themselves out as, the agents, servants, employees, or representative in any manner, of The Owner.

ARTICLE 9
ASSIGNMENT, DELEGATION, AND SUBCONTRACT

Contractor may not assign, delegate, or subcontract the services or duties to be performed hereunder without the prior written consent of The Owner. Any assignment, delegation, or subcontract, with or without The Owner's consent, shall not operate to relieve Contractor of its responsibilities hereunder and, notwithstanding any such assignment, delegation, or subcontract, Contractor shall remain obligated to The Owner in these undertakings.

MI0012664

ARTICLE 10
FORCE MAJEURE

Each party to this Agreement shall not be liable to the other for failure to perform its obligations hereunder if and to the extent that such failure to perform is caused by or results from causes beyond its control, including, without limitation, strikes, lockouts, or other labor disputes; civil disturbances; fires, acts of God; or acts of the public enemy.

ARTICLE 11
MISCELLANEOUS

It is understood that the Contractor has no authority whatever, expressed or implied, by virtue of this Agreement to commit The Owner, in any way to perform in any manner or to pay money for services or material.

This Agreement and any exhibit attached pursuant thereto shall be governed by the laws of the State of Michigan.

The terms of this Agreement and of any of the schedules executed pursuant hereto and incorporated herein shall be read and interpreted, if possible, so that there is no conflict between them. To the extent there is such conflict, the terms of the applicable schedule shall prevail.

IN WITNESS WHEREOF, The Owner and Contractor have executed this Agreement effective as of the day and year first written above.

Date: _____

By: _____

Title: _____

EaglePicher Automotive

Date: _____

By: _____

Title: _____

Conestoga-Rovers & Associates, Inc.

MI0012665

EaglePicher Automotive Wolverine Division

EaglePicher Automotive Wolverine Gasket
2638 Princess Street
Inkster, MI 48141
Tel (313) 562-6400
Fax (313) 562-8248

BLANKET PURCHASE ORDER 000324

Supplier: Conestoga-Rovers & Associates
14496 Sheldon Road
Suite 200
Plymouth, MI 48170
Phone: 734-453-5123
Fax: 734-453-5201

Attention: Thomas Kinney

Ship To: Wolverine Gasket Inkster
2638 Princess St.
Inkster, MI 48141

Bill To: Attn: Accounts Payable
2638 Princess Street
Inkster, MI 48141

PO No: 000324
PO Date: 5/10/04
Due Date:
PO Revision: 1
Revision Date: 9/8/04
Assigned Buyer: Melissa Countryman

Blanket Order: 5/1/04 - 4/30/09
Pymt Terms: Net 30 days
FOB: Other-Buyer defined
Freight Terms:
Note: CAPITAL PROJECT #04-104
Invoices as billed and approved by Ray Dewyer.

ITEMS

Item:Rel	Description	Status	Account	Due Date	Order Quantity	Unit Price	Setup Charge	Extended Price
1:0	Blanket Order to cover environmental and remediation services as outlined in proposal 35298 dated March 5, 2004 which is attached as exhibit A. Contract to cover tasks necessary to achieve remediational objective from May 1, 2004 through April 31, 2009. Completion of tasks at total billing less than above value will result in shared savings as follows: 10% to CRA and 90% to Wolverine. Budget tracking will be provided through CRA on a quarterly basis to Ray Dewyer. Costs for all tasks necessary to achieve remedial objective are to be invoiced on a lump sum basis. The total lump sum charges will be $120,000.00 and will be invoiced over a 5-year period. Lump sum payments of $7,500.00 will be due on a quarterly basis for the first three years. Payments will consist of 12 quarterly payments starting 30 days after the first injection and every three months thereafter for 3 years. Wolverine Project 04-104.	-	2190-01-00		12.00 Each	7,500.00/Each		
1:3		Planned	2190-01-00	6/30/04	1 Each	7,500.00/Each	0	7,500.00
1:1	Inkster Remediation Project	Firm	2190-01-00	9/30/04	1 Each	7,500.00/Each	0	7,500.00
1:2		Planned	2190-01-00	12/30/04	1 Each	7,500.00/Each	0	7,500.00
1:8		Planned	2190-01-00	3/30/05	1 Each	7,500.00/Each	0	7,500.00
1:9		Planned	2190-01-00	6/30/05	1 Each	7,500.00/Each	0	7,500.00
1:6		Planned	2190-01-00	9/30/05	1 Each	7,500.00/Each	0	7,500.00
1:7		Planned	2190-01-00	12/30/05	1 Each	7,500.00/Each	0	7,500.00

Plexus Online 9/8/04 2:19 PM tworniak

EaglePicher Automotive
Wolverine Division

EaglePicher Automotive Wolverine Gasket
2638 Princess Street
Inkster, MI 48141
Tel (313) 562-6400
Fax (313) 562-8248

BLANKET PURCHASE ORDER 000324

ITEMS

Item:Rel	Description	Status	Account	Due Date	Order Quantity	Unit Price	Setup Charge	Extended Price
1:4		Planned	2190-01-00	3/30/06	1 Each	7,500.00/Each	0	7,500.00
1:5		Planned	2190-01-00	6/30/06	1 Each	7,500.00/Each	0	7,500.00
1:10		Planned	2190-01-00	9/30/06	1 Each	7,500.00/Each	0	7,500.00
1:11		Planned	2190-01-00	12/30/06	1 Each	7,500.00/Each	0	7,500.00
1:12		Planned	2190-01-00	3/30/07	1 Each	7,500.00/Each	0	7,500.00
				Total	**12**			**90,000.00**
2:0	The remaining 2 years will be invoiced at $3,750.00 per quarter, consisting of 8 quarterly payments.	-	2190-01-00		8.0 Each	3,750.00/Each		
2:1		Planned	2190-01-00	9/30/07	1 Each	3,750.00/Each	0	3,750.00
2:2		Planned	2190-01-00	12/30/07	1 Each	3,750.00/Each	0	3,750.00
2:3		Planned	2190-01-00	3/30/08	1 Each	3,750.00/Each	0	3,750.00
2:4		Planned	2190-01-00	6/30/08	1 Each	3,750.00/Each	0	3,750.00
2:5		Planned	2190-01-00	9/30/08	1 Each	3,750.00/Each	0	3,750.00
2:6		Planned	2190-01-00	12/30/08	1 Each	3,750.00/Each	0	3,750.00
2:7		Planned	2190-01-00	3/30/09	1 Each	3,750.00/Each	0	3,750.00
2:8		Planned	2190-01-00	6/30/09	1 Each	3,750.00/Each	0	3,750.00
				Total	**8**			**30,000.00**

Total: 120,000.00

NOTES

Melissa Countryman

Attention Service Suppliers: By acceptance of this purchase order, you agree to conform to Eagle Picher safety policies and procedures.

This purchase order is subject to EaglePicher Automotive, Wolverine Gasket Division standard terms and conditions which are available at http://www.eaglepicher.com. If you are unable to locate this website or have difficulty retrieving the terms and conditions, please contact the issuer of this order.

Plexus Online 9/8/04 2:19 PM tworniak

WOLVERINE GASKET DIVISION
2638 PRINCESS STREET
INKSTER, MICHIGAN 48141
PHONE (313) 562-6400 FAX (313) 562-5427

PURCHASE ORDER REQUISITION / RELEASE

Project # ~~04~~ 104
PO # 000324

SEND ALL INVOICES TO

SHIP

- [x] INKSTER DIVISION, 2638 PRINCESS ST., INKSTER, MI 48141, (313) 562-6400
- [ ] BLACKSBURG DIVISION, 201 INDUSTRIAL PARK RD. S.E., BLACKSBURG, VA 24060, (540) 552-6082
- [ ] LEESBURG DIVISION, 10825 C.R. 44, LEESBURG, FL 34788, (352) 787-3015
- [ ] CEDAR RUN DIVISION, 3175 STATE STREET, BLACKSBURG, VA 24060, (540) 953-1742

SUPPLIER	Conestoga - Rovers	SUPPLIER#	P.O. NO. 000324
ADDRESS		TELEPHONE	RELEASE NO.
CITY	STATE	ZIP	DATE

FOR DEPT	TO BE USED FOR		CONFIRMED DATE 7/1/04
DEL. REQ.	F.O.B. POINT	TERMS	CONFIRMED TO

			ACCOUNT CODE	PRICE	
	Inkster Remediation		2000762109		
	Project				
				7,500	LT
	Total			7,500	
			RECEIVED AUG 31 2004		

SIGNED: APPROVED (DEPT. HEAD) AUTHORIZED (PURCHASING) M Country 9/1/04

FORM 4MM06126 REV: B

RECEIVING

MI0012668

WOLVERINE GASKET DIVISION
2638 PRINCESS STREET
INKSTER, MICHIGAN 48141
PHONE (313) 562-6400 FAX (313) 562-5427

SEND ALL INVOICES TO

PURCHASE ORDER REQUISITION / RELEASE

Project # 04-104
PO # 000324

SHIP TO

- [x] INKSTER DIVISION, 2638 PRINCESS ST., INKSTER, MI 48141, (313) 562-6400
- [ ] BLACKSBURG DIVISION, 201 INDUSTRIAL PARK RD. S.E., BLACKSBURG, VA 24060, (540) 552-6082
- [ ] LEESBURG DIVISION, 10825 C.R. 44, LEESBURG, FL 34788, (352) 787-3015
- [ ] CEDAR RUN DIVISION, 3175 STATE STREET, BLACKSBURG, VA 24060, (540) 953-1742

SUPPLIER	Conestoga - Rovers	SUPPLIER#	P.O. NO.
ADDRESS		TELEPHONE	RELEASE NO.
CITY		STATE / ZIP	DATE

FOR DEPT	TO BE USED FOR		CONFIRMED DATE 7/1/04
DEL. REQ.	F.O.B. POINT	TERMS	CONFIRMED TO

QTY.	DESCRIPTION	DEPT.	ACCOUNT CODE	PRICE	U/M
	Inkster Remediation Project			7,500	LS
	Total			7,500	

RECEIVED AUG 31 2004

SIGNED | APPROVED (DEPT. HEAD) | AUTHORIZED (PURCHASING)

FORM 4MM06126 REV: B

ORIGINATOR

MI0012669

PURCHASE ORDER

WOLVERINE GASKET DIVISION

A DIVISION OF EAGLE-PICHER INDUSTRIES, INC.

ORDER NUMBER 000324

THIS NUMBER MUST APPEAR ON ALL CORRESPONDENCE, INVOICES, SHIPPING PAPERS AND PACKAGES.

DATE REQUIRED	SHIP VIA	F.O.B.	TERMS	REQ. BY	DATE ISSUED
		Other-Buyer defined	Net 30 days	D. Rommeck	05/10/04

To

Conestoga-Rovers & Associates
14496 Sheldon Road, Suite 200
Plymouth, MI 48170
Attn: Thomas Kinney

SHIP TO

- [X] **INKSTER DIV.** 2638 PRINCESS ST., INKSTER, MI 48141 PHONE: 313-562-6400 • FAX: 313-562-8248
- [ ] **EAGLE-PICHER AUTOMOTIVE** 2424 JOHN DALY, INKSTER, MI 48141 PHONE: 313-278-5956 • FAX: 313-278-3546
- [ ] **BLACKSBURG DIV.** 201 INDUSTRIAL PARK RD. S.E., BLACKSBURG, VA 24060 PHONE: 540-552-7674 • FAX: 540-552-6082
- [ ] **LEESBURG DIV.** 10825 C.R. 44, LEESBURG, FL 34788 PHONE: 352-787-3015 • FAX: 352-728-3712
- [ ] **CEDAR RUN DIV.** 3175 STATE ST., BLACKSBURG, VA 24060 PHONE: 540-953-1742 • FAX: 540-961-2346

MAIL ALL INVOICES TO INKSTER OFFICE

SALES TAX
[ ] APPLIES [ ] DOES NOT APPLY INDUSTRIAL PROCESSING

[X] **NO TRUCK DELIVERIES WILL BE RECEIVED AFTER 3:00 P.M.**

PLEASE FURNISH THE MATERIAL SPECIFIED BELOW, SUBJECT TO TERMS AND CONDITIONS HEREIN NAMED, WHICH ARE A PART OF THIS CONTRACT.

QUANTITY	DESCRIPTION	PRICE
1 lt	Blanket order to cover environmental and remediation services as outlined in Proposal #35298 dated March 5, 2004, which is attached as Exhibit A. Contract to cover tasks necessary to achieve remediational objective from May 1, 2004 through April 31, 2009. Completion of tasks at total billing less than above value will result in shared savings as follows: 10% to CRA and 90% to Wolverine. Budget tracking will be provided through CRA on a quarterly basis to Dewyer. Costs for all tasks necessary to achieve remedial objective are to be invoiced on a lump sum basis. The total lump sum charges will be $120,000.00 and will be invoiced overa 5-year period. Lump sum payments of $7,500.00 will be due on a quarterly basis for the first 3 years. Payments will consist of 12 quarterly payments starting 30 days after the first injection and every three months thereafter for 3 years. The remaining 2 years will be invoiced at $3,750.00 per quarter, consisting of 8 quarterly payments. Reference Wolverine Project #04-104. CONFIRMING VERBAL ORDER TO: _____ ON: _____	$120,000.00/1t as outlined in payment schedule and Proposal. Invoiced as billed and approved by Ray Dewyer.

ACCOUNT CLASS: 2000-1690-00 | FACTORY ORDER NUMBER: | BUYER: TW

MAIL INVOICES, AND ORIGINAL BILLS OF LADING, ORIGINAL EXPRESS RECEIPT ON DAY OF SHIPMENT. RENDER ALL INVOICES IN DUPLICATE. ALL SHIPMENTS MUST CONTAIN PACKING SLIPS.

ACKNOWLEDGE THIS ORDER PROMPTLY, GIVING DATE YOU INTEND TO MAKE SHIPMENT. NOTIFY US IMMEDIATELY IF UNABLE TO FILL ORDER AS SPECIFIED.

IF MATERIAL IS NOT IN ACCORDANCE WITH OUR SPECIFICATIONS, OR IS IN ANY WAY DEFECTIVE, IT WILL BE RETURNED TO YOU AT YOUR EXPENSE, PLUS ANY TRANSPORTATION CHARGES PAID BY US.

CONDITIONS

Wolverine Gasket Division reserves the right to cancel this order or any part thereof, if material is not shipped according to deliveries specified, or for causes due to any acts or demands of the United States Government, or to fires, strikes, or other causes beyond its control. Wolverine Gasket Division further reserves the right to cancel this order if material is not in accordance with blue prints, approved samples, or specifications, or is defective in workmanship or material, or is not satisfactory to them. If the terms and conditions stipulated herein do not meet with your approval, inform us promptly before making shipment, otherwise we will consider your acceptance of this order to have been made under the conditions named.

It is a condition of this order, and by filling it you will be deemed to have agreed thereto, that you will, at your own cost and expense, defend us from any and all suits for infringement of letters patent, copyright, and/or trade mark, which suit or suits result from the use or sale of any goods, devices, or apparatus sold and delivered to us under this order, and will *indemnify and hold us harmless* in any such suit or suits.

This order is placed by the purchaser with the understanding, and in accepting the seller agrees, that no Federal or State statute has been violated in the manufacture or sale of the items covered by this order.

Any invoices issued against this purchase order must contain the following certification: "We hereby certify that the goods covered by this invoice were produced in compliance with all applicable requirements of sections 6, 7, and 12 of the Fair Labor Standards Act, as amended, and of regulations and orders of the United States Department of Labor issued under section 14 thereof."

WOLVERINE GASKET DIVISION

PURCHASING AGENT

FORM 4MM 16124 REV. A

ORIGINAL

MI0012670

SEVERN TRENT LABORATORIES, INC.

PRELIMINARY DATA SUMMARY

The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Conestoga Rovers & Assoc., Inc

Lot #: A4F170188 WOLVERINE GASKET **Date Reported:** 6/30/04

Project Number: 35298

Client Sample ID: GW-35298-061604-BF-001

Sample #: 001 Date Sampled: 06/16/04 09:40 Date Received: 06/17/04 Matrix: WATER

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD	
Volatile Organics by GC/MS					In Review
1,2,4-Trimethylbenzene	ND	1.0	ug/L	SW846 8260B	
Acetone	ND	25	ug/L	SW846 8260B	
Benzene	ND	1.0	ug/L	SW846 8260B	
Bromodichloromethane	ND	1.0	ug/L	SW846 8260B	
Bromoform	ND	1.0	ug/L	SW846 8260B	
Bromomethane	ND	1.0	ug/L	SW846 8260B	
2-Butanone	ND	25	ug/L	SW846 8260B	
Carbon disulfide	ND	5.0	ug/L	SW846 8260B	
Carbon tetrachloride	ND	1.0	ug/L	SW846 8260B	
Chlorobenzene	ND	1.0	ug/L	SW846 8260B	
Chloroethane	ND	1.0	ug/L	SW846 8260B	
Chloroform	ND	1.0	ug/L	SW846 8260B	
Chloromethane	ND	1.0	ug/L	SW846 8260B	
Cyclohexane	ND	1.0	ug/L	SW846 8260B	
Dibromochloromethane	ND	1.0	ug/L	SW846 8260B	
1,2-Dibromo-3-chloro-propane	ND	1.0	ug/L	SW846 8260B	
1,2-Dibromoethane	ND	1.0	ug/L	SW846 8260B	
1,2-Dichlorobenzene	ND	1.0	ug/L	SW846 8260B	
1,3-Dichlorobenzene	ND	1.0	ug/L	SW846 8260B	
1,4-Dichlorobenzene	ND	1.0	ug/L	SW846 8260B	
Dichlorodifluoromethane	ND	1.0	ug/L	SW846 8260B	
1,1-Dichloroethane	ND	1.0	ug/L	SW846 8260B	
1,2-Dichloroethane	ND	1.0	ug/L	SW846 8260B	
1,1-Dichloroethene	ND	1.0	ug/L	SW846 8260B	
cis-1,2-Dichloroethene	ND	1.0	ug/L	SW846 8260B	
trans-1,2-Dichloroethene	ND	1.0	ug/L	SW846 8260B	
1,2-Dichloropropane	ND	1.0	ug/L	SW846 8260B	
cis-1,3-Dichloropropene	ND	1.0	ug/L	SW846 8260B	
trans-1,3-Dichloropropene	ND	1.0	ug/L	SW846 8260B	
Ethylbenzene	ND	1.0	ug/L	SW846 8260B	
2-Hexanone	ND	50	ug/L	SW846 8260B	
Isopropylbenzene	ND	5.0	ug/L	SW846 8260B	
Methyl acetate	ND	10	ug/L	SW846 8260B	
Methylene chloride	ND	5.0	ug/L	SW846 8260B	
Methylcyclohexane	ND	1.0	ug/L	SW846 8260B	
4-Methyl-2-pentanone	ND	50	ug/L	SW846 8260B	

(Continued on next page)

SEVERN TRENT LABORATORIES, INC.

PRELIMINARY DATA SUMMARY

The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Conestoga Rovers & Assoc., Inc

Lot #: A4F170188 WOLVERINE GASKET **Date Reported:** 6/30/04

Project Number: 35298

Client Sample ID: GW-35298-061604-BF-001

Sample #: 001 Date Sampled: 06/16/04 09:40 Date Received: 06/17/04 Matrix: WATER

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD
Volatile Organics by GC/MS				In Review
Methyl tert-butyl ether	ND	5.0	ug/L	SW846 8260B
Styrene	ND	1.0	ug/L	SW846 8260B
1,1,2,2-Tetrachloroethane	ND	1.0	ug/L	SW846 8260B
Tetrachloroethene	ND	1.0	ug/L	SW846 8260B
Toluene	**1.1**	**1.0**	**ug/L**	**SW846 8260B**
1,2,4-Trichloro-benzene	ND	5.0	ug/L	SW846 8260B
1,1,1-Trichloroethane	ND	1.0	ug/L	SW846 8260B
1,1,2-Trichloroethane	ND	1.0	ug/L	SW846 8260B
Trichloroethene	ND	1.0	ug/L	SW846 8260B
Trichlorofluoromethane	ND	1.0	ug/L	SW846 8260B
1,1,2-Trichloro-1,2,2-trifluoroethane	ND	1.0	ug/L	SW846 8260B
Vinyl chloride	ND	1.0	ug/L	SW846 8260B
Xylenes (total)	ND	2.0	ug/L	SW846 8260B

Client Sample ID: GW-35298-061604-BF-002 6P 3-04

Sample #: 002 Date Sampled: 06/16/04 11:00 Date Received: 06/17/04 Matrix: WATER

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD
Volatile Organics by GC/MS				In Review
1,2,4-Trimethylbenzene	ND	17	ug/L	SW846 8260B
Acetone	ND	420	ug/L	SW846 8260B
Benzene	ND	17	ug/L	SW846 8260B
Bromodichloromethane	ND	17	ug/L	SW846 8260B
Bromoform	ND	17	ug/L	SW846 8260B
Bromomethane	ND	17	ug/L	SW846 8260B
2-Butanone	ND	420	ug/L	SW846 8260B
Carbon disulfide	ND	83	ug/L	SW846 8260B
Carbon tetrachloride	ND	17	ug/L	SW846 8260B
Chlorobenzene	**500**	**17**	**ug/L**	**SW846 8260B**
Chloroethane	ND	17	ug/L	SW846 8260B
Chloroform	ND	17	ug/L	SW846 8260B
Chloromethane	ND	17	ug/L	SW846 8260B
Cyclohexane	ND	17	ug/L	SW846 8260B
Dibromochloromethane	ND	17	ug/L	SW846 8260B
1,2-Dibromo-3-chloro-propane	ND	17	ug/L	SW846 8260B

(Continued on next page)

SEVERN TRENT LABORATORIES, INC.

PRELIMINARY DATA SUMMARY

The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Conestoga Rovers & Assoc., Inc

Lot #: A4F170188 WOLVERINE GASKET **Date Reported:** 6/30/04

Project Number: 35298

Client Sample ID: GW-35298-061604-BF-002

Sample #: 002 Date Sampled: 06/16/04 11:00 Date Received: 06/17/04 Matrix: WATER

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD	
Volatile Organics by GC/MS					In Review
1,2-Dibromoethane	ND	17	ug/L	SW846 8260B	
1,2-Dichlorobenzene	ND	17	ug/L	SW846 8260B	
1,3-Dichlorobenzene	ND	17	ug/L	SW846 8260B	
1,4-Dichlorobenzene	ND	17	ug/L	SW846 8260B	
Dichlorodifluoromethane	ND	17	ug/L	SW846 8260B	
1,1-Dichloroethane	ND	17	ug/L	SW846 8260B	
1,2-Dichloroethane	ND	17	ug/L	SW846 8260B	
1,1-Dichloroethene	ND	17	ug/L	SW846 8260B	
cis-1,2-Dichloroethene	ND	17	ug/L	SW846 8260B	
trans-1,2-Dichloroethene	ND	17	ug/L	SW846 8260B	
1,2-Dichloropropane	ND	17	ug/L	SW846 8260B	
cis-1,3-Dichloropropene	ND	17	ug/L	SW846 8260B	
trans-1,3-Dichloropropene	ND	17	ug/L	SW846 8260B	
Ethylbenzene	ND	17	ug/L	SW846 8260B	
2-Hexanone	ND	830	ug/L	SW846 8260B	
Isopropylbenzene	ND	83	ug/L	SW846 8260B	
Methyl acetate	ND	170	ug/L	SW846 8260B	
Methylene chloride	ND	83	ug/L	SW846 8260B	
Methylcyclohexane	ND	17	ug/L	SW846 8260B	
4-Methyl-2-pentanone	ND	830	ug/L	SW846 8260B	
Methyl tert-butyl ether	ND	83	ug/L	SW846 8260B	
Styrene	ND	17	ug/L	SW846 8260B	
1,1,2,2-Tetrachloroethane	ND	17	ug/L	SW846 8260B	
Tetrachloroethene	ND	17	ug/L	SW846 8260B	
Toluene	ND	17	ug/L	SW846 8260B	
1,2,4-Trichloro-benzene	ND	83	ug/L	SW846 8260B	
1,1,1-Trichloroethane	ND	17	ug/L	SW846 8260B	
1,1,2-Trichloroethane	ND	17	ug/L	SW846 8260B	
Trichloroethene	ND	17	ug/L	SW846 8260B	
Trichlorofluoromethane	ND	17	ug/L	SW846 8260B	
1,1,2-Trichloro-1,2,2-trifluoroethane	ND	17	ug/L	SW846 8260B	
Vinyl chloride	ND	17	ug/L	SW846 8260B	
Xylenes (total)	ND	33	ug/L	SW846 8260B	

(Continued on next page)

SEVERN TRENT LABORATORIES, INC.

PRELIMINARY DATA SUMMARY

The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Conestoga Rovers & Assoc., Inc

Lot #: A4F170188 WOLVERINE GASKET **Date Reported:** 6/30/04

Project Number: 35298

Client Sample ID: GW-35298-061604-BF-003 GP04-04

Sample #: 003 Date Sampled: 06/16/04 11:45 Date Received: 06/17/04 Matrix: WATER

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD	
Volatile Organics by GC/MS					In Review
1,2,4-Trimethylbenzene	ND	500	ug/L	SW846 8260B	
Acetone	ND	12000	ug/L	SW846 8260B	
Benzene	**2800**	**500**	**ug/L**	**SW846 8260B**	
Bromodichloromethane	ND	500	ug/L	SW846 8260B	
Bromoform	ND	500	ug/L	SW846 8260B	
Bromomethane	ND	500	ug/L	SW846 8260B	
2-Butanone	ND	12000	ug/L	SW846 8260B	
Carbon disulfide	ND	2500	ug/L	SW846 8260B	
Carbon tetrachloride	ND	500	ug/L	SW846 8260B	
Chlorobenzene	**15000**	**500**	**ug/L**	**SW846 8260B**	
Chloroethane	ND	500	ug/L	SW846 8260B	
Chloroform	ND	500	ug/L	SW846 8260B	
Chloromethane	ND	500	ug/L	SW846 8260B	
Cyclohexane	ND	500	ug/L	SW846 8260B	
Dibromochloromethane	ND	500	ug/L	SW846 8260B	
1,2-Dibromo-3-chloro-propane	ND	500	ug/L	SW846 8260B	
1,2-Dibromoethane	ND	500	ug/L	SW846 8260B	
1,2-Dichlorobenzene	ND	500	ug/L	SW846 8260B	
1,3-Dichlorobenzene	ND	500	ug/L	SW846 8260B	
1,4-Dichlorobenzene	ND	500	ug/L	SW846 8260B	
Dichlorodifluoromethane	ND	500	ug/L	SW846 8260B	
1,1-Dichloroethane	ND	500	ug/L	SW846 8260B	
1,2-Dichloroethane	ND	500	ug/L	SW846 8260B	
1,1-Dichloroethene	ND	500	ug/L	SW846 8260B	
cis-1,2-Dichloroethene	ND	500	ug/L	SW846 8260B	
trans-1,2-Dichloroethene	ND	500	ug/L	SW846 8260B	
1,2-Dichloropropane	ND	500	ug/L	SW846 8260B	
cis-1,3-Dichloropropene	ND	500	ug/L	SW846 8260B	
trans-1,3-Dichloropropene	ND	500	ug/L	SW846 8260B	
Ethylbenzene	ND	500	ug/L	SW846 8260B	
2-Hexanone	ND	25000	ug/L	SW846 8260B	
Isopropylbenzene	ND	2500	ug/L	SW846 8260B	
Methyl acetate	ND	5000	ug/L	SW846 8260B	
Methylene chloride	ND	2500	ug/L	SW846 8260B	
Methylcyclohexane	ND	500	ug/L	SW846 8260B	
4-Methyl-2-pentanone	ND	25000	ug/L	SW846 8260B	

(Continued on next page)

SEVERN TRENT LABORATORIES, INC.

PRELIMINARY DATA SUMMARY

The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Conestoga Rovers & Assoc., Inc

Lot #: A4F170188 WOLVERINE GASKET **Date Reported:** 6/30/04

Project Number: 35298

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD	
Client Sample ID: GW-35298-061604-BF-003					
Sample #: 003 Date Sampled: 06/16/04 11:45 Date Received: 06/17/04 Matrix: WATER					
Volatile Organics by GC/MS					In Review
Methyl tert-butyl ether	ND	2500	ug/L	SW846 8260B	
Styrene	ND	500	ug/L	SW846 8260B	
1,1,2,2-Tetrachloroethane	ND	500	ug/L	SW846 8260B	
Tetrachloroethene	ND	500	ug/L	SW846 8260B	
Toluene	**1200**	**500**	**ug/L**	**SW846 8260B**	
1,2,4-Trichloro-benzene	ND	2500	ug/L	SW846 8260B	
1,1,1-Trichloroethane	ND	500	ug/L	SW846 8260B	
1,1,2-Trichloroethane	ND	500	ug/L	SW846 8260B	
Trichloroethene	ND	500	ug/L	SW846 8260B	
Trichlorofluoromethane	ND	500	ug/L	SW846 8260B	
1,1,2-Trichloro-1,2,2-trifluoroethane	ND	500	ug/L	SW846 8260B	
Vinyl chloride	ND	500	ug/L	SW846 8260B	
Xylenes (total)	ND	1000	ug/L	SW846 8260B	
Client Sample ID: GW-35298-061604-BF-004					
Sample #: 004 Date Sampled: 06/16/04 12:30 Date Received: 06/17/04 Matrix: WATER					
Volatile Organics by GC/MS					In Review
1,2,4-Trimethylbenzene	ND	3.3	ug/L	SW846 8260B	
Acetone	ND	83	ug/L	SW846 8260B	
Benzene	**13**	**3.3**	**ug/L**	**SW846 8260B**	
Bromodichloromethane	ND	3.3	ug/L	SW846 8260B	
Bromoform	ND	3.3	ug/L	SW846 8260B	
Bromomethane	ND	3.3	ug/L	SW846 8260B	
2-Butanone	ND	83	ug/L	SW846 8260B	
Carbon disulfide	ND	17	ug/L	SW846 8260B	
Carbon tetrachloride	ND	3.3	ug/L	SW846 8260B	
Chlorobenzene	**110**	**3.3**	**ug/L**	**SW846 8260B**	
Chloroethane	ND	3.3	ug/L	SW846 8260B	
Chloroform	ND	3.3	ug/L	SW846 8260B	
Chloromethane	ND	3.3	ug/L	SW846 8260B	
Cyclohexane	ND	3.3	ug/L	SW846 8260B	
Dibromochloromethane	ND	3.3	ug/L	SW846 8260B	
1,2-Dibromo-3-chloro-propane	ND	3.3	ug/L	SW846 8260B	

(Continued on next page)

SEVERN TRENT LABORATORIES, INC.

PRELIMINARY DATA SUMMARY

The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Conestoga Rovers & Assoc., Inc

Lot #: A4F170188 WOLVERINE GASKET **Date Reported:** 6/30/04

Project Number: 35298

Client Sample ID: GW-35298-061604-BF-004

Sample #: 004 Date Sampled: 06/16/04 12:30 Date Received: 06/17/04 Matrix: WATER

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD	
Volatile Organics by GC/MS					In Review
1,2-Dibromoethane	ND	3.3	ug/L	SW846 8260B	
1,2-Dichlorobenzene	ND	3.3	ug/L	SW846 8260B	
1,3-Dichlorobenzene	ND	3.3	ug/L	SW846 8260B	
1,4-Dichlorobenzene	ND	3.3	ug/L	SW846 8260B	
Dichlorodifluoromethane	ND	3.3	ug/L	SW846 8260B	
1,1-Dichloroethane	ND	3.3	ug/L	SW846 8260B	
1,2-Dichloroethane	ND	3.3	ug/L	SW846 8260B	
1,1-Dichloroethene	ND	3.3	ug/L	SW846 8260B	
cis-1,2-Dichloroethene	ND	3.3	ug/L	SW846 8260B	
trans-1,2-Dichloroethene	ND	3.3	ug/L	SW846 8260B	
1,2-Dichloropropane	ND	3.3	ug/L	SW846 8260B	
cis-1,3-Dichloropropene	ND	3.3	ug/L	SW846 8260B	
trans-1,3-Dichloropropene	ND	3.3	ug/L	SW846 8260B	
Ethylbenzene	ND	3.3	ug/L	SW846 8260B	
2-Hexanone	ND	170	ug/L	SW846 8260B	
Isopropylbenzene	ND	17	ug/L	SW846 8260B	
Methyl acetate	ND	33	ug/L	SW846 8260B	
Methylene chloride	ND	17	ug/L	SW846 8260B	
Methylcyclohexane	ND	3.3	ug/L	SW846 8260B	
4-Methyl-2-pentanone	ND	170	ug/L	SW846 8260B	
Methyl tert-butyl ether	ND	17	ug/L	SW846 8260B	
Styrene	ND	3.3	ug/L	SW846 8260B	
1,1,2,2-Tetrachloroethane	ND	3.3	ug/L	SW846 8260B	
Tetrachloroethene	ND	3.3	ug/L	SW846 8260B	
Toluene	**12**	**3.3**	**ug/L**	**SW846 8260B**	
1,2,4-Trichloro-benzene	ND	17	ug/L	SW846 8260B	
1,1,1-Trichloroethane	ND	3.3	ug/L	SW846 8260B	
1,1,2-Trichloroethane	ND	3.3	ug/L	SW846 8260B	
Trichloroethene	ND	3.3	ug/L	SW846 8260B	
Trichlorofluoromethane	ND	3.3	ug/L	SW846 8260B	
1,1,2-Trichloro-1,2,2-trifluoroethane	ND	3.3	ug/L	SW846 8260B	
Vinyl chloride	ND	3.3	ug/L	SW846 8260B	
Xylenes (total)	ND	6.7	ug/L	SW846 8260B	

(Continued on next page)

SEVERN TRENT LABORATORIES, INC.

PRELIMINARY DATA SUMMARY

The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Conestoga Rovers & Assoc., Inc

Lot #: A4F170188 WOLVERINE GASKET **Date Reported:** 6/30/04

Project Number: 35298

Client Sample ID: GW-35298-061604-BF-006

Sample #: 005 Date Sampled: 06/16/04 13:35 Date Received: 06/17/04 Matrix: WATER

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD	
Volatile Organics by GC/MS					In Review
1,2,4-Trimethylbenzene	ND	1.4	ug/L	SW846 8260B	
Acetone	ND	36	ug/L	SW846 8260B	
Benzene	**6.2**	**1.4**	**ug/L**	**SW846 8260B**	
Bromodichloromethane	ND	1.4	ug/L	SW846 8260B	
Bromoform	ND	1.4	ug/L	SW846 8260B	
Bromomethane	ND	1.4	ug/L	SW846 8260B	
2-Butanone	ND	36	ug/L	SW846 8260B	
Carbon disulfide	ND	7.2	ug/L	SW846 8260B	
Carbon tetrachloride	ND	1.4	ug/L	SW846 8260B	
Chlorobenzene	**45**	**1.4**	**ug/L**	**SW846 8260B**	
Chloroethane	ND	1.4	ug/L	SW846 8260B	
Chloroform	ND	1.4	ug/L	SW846 8260B	
Chloromethane	ND	1.4	ug/L	SW846 8260B	
Cyclohexane	ND	1.4	ug/L	SW846 8260B	
Dibromochloromethane	ND	1.4	ug/L	SW846 8260B	
1,2-Dibromo-3-chloro-propane	ND	1.4	ug/L	SW846 8260B	
1,2-Dibromoethane	ND	1.4	ug/L	SW846 8260B	
1,2-Dichlorobenzene	ND	1.4	ug/L	SW846 8260B	
1,3-Dichlorobenzene	ND	1.4	ug/L	SW846 8260B	
1,4-Dichlorobenzene	ND	1.4	ug/L	SW846 8260B	
Dichlorodifluoromethane	ND	1.4	ug/L	SW846 8260B	
1,1-Dichloroethane	ND	1.4	ug/L	SW846 8260B	
1,2-Dichloroethane	ND	1.4	ug/L	SW846 8260B	
1,1-Dichloroethene	ND	1.4	ug/L	SW846 8260B	
cis-1,2-Dichloroethene	ND	1.4	ug/L	SW846 8260B	
trans-1,2-Dichloroethene	ND	1.4	ug/L	SW846 8260B	
1,2-Dichloropropane	ND	1.4	ug/L	SW846 8260B	
cis-1,3-Dichloropropene	ND	1.4	ug/L	SW846 8260B	
trans-1,3-Dichloropropene	ND	1.4	ug/L	SW846 8260B	
Ethylbenzene	ND	1.4	ug/L	SW846 8260B	
2-Hexanone	ND	72	ug/L	SW846 8260B	
Isopropylbenzene	ND	7.2	ug/L	SW846 8260B	
Methyl acetate	ND	14	ug/L	SW846 8260B	
Methylene chloride	ND	7.2	ug/L	SW846 8260B	
Methylcyclohexane	ND	1.4	ug/L	SW846 8260B	
4-Methyl-2-pentanone	ND	72	ug/L	SW846 8260B	

(Continued on next page)

SEVERN TRENT LABORATORIES, INC.

PRELIMINARY DATA SUMMARY

The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Conestoga Rovers & Assoc., Inc
WOLVERINE GASKET
Project Number: 35298

Lot #: A4F170188 **Date Reported:** 6/30/04

Client Sample ID: GW-35298-061604-BF-006
Sample #: 005 Date Sampled: 06/16/04 13:35 Date Received: 06/17/04 Matrix: WATER

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD	
Volatile Organics by GC/MS					In Review
Methyl tert-butyl ether	ND	7.2	ug/L	SW846 8260B	
Styrene	ND	1.4	ug/L	SW846 8260B	
1,1,2,2-Tetrachloroethane	ND	1.4	ug/L	SW846 8260B	
Tetrachloroethene	ND	1.4	ug/L	SW846 8260B	
Toluene	**5.2**	**1.4**	**ug/L**	**SW846 8260B**	
1,2,4-Trichloro-benzene	ND	7.2	ug/L	SW846 8260B	
1,1,1-Trichloroethane	ND	1.4	ug/L	SW846 8260B	
1,1,2-Trichloroethane	ND	1.4	ug/L	SW846 8260B	
Trichloroethene	ND	1.4	ug/L	SW846 8260B	
Trichlorofluoromethane	ND	1.4	ug/L	SW846 8260B	
1,1,2-Trichloro-1,2,2-trifluoroethane	ND	1.4	ug/L	SW846 8260B	
Vinyl chloride	ND	1.4	ug/L	SW846 8260B	
Xylenes (total)	ND	2.9	ug/L	SW846 8260B	

Client Sample ID: GW-35298-061604-BF-005
Sample #: 006 Date Sampled: 06/16/04 13:30 Date Received: 06/17/04 Matrix: WATER

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD	
Volatile Organics by GC/MS					In Review
1,2,4-Trimethylbenzene	ND	1.0	ug/L	SW846 8260B	
Acetone	ND	25	ug/L	SW846 8260B	
Benzene	**5.1**	**1.0**	**ug/L**	**SW846 8260B**	
Bromodichloromethane	ND	1.0	ug/L	SW846 8260B	
Bromoform	ND	1.0	ug/L	SW846 8260B	
Bromomethane	ND	1.0	ug/L	SW846 8260B	
2-Butanone	ND	25	ug/L	SW846 8260B	
Carbon disulfide	ND	5.0	ug/L	SW846 8260B	
Carbon tetrachloride	ND	1.0	ug/L	SW846 8260B	
Chlorobenzene	**37**	**1.0**	**ug/L**	**SW846 8260B**	
Chloroethane	ND	1.0	ug/L	SW846 8260B	
Chloroform	ND	1.0	ug/L	SW846 8260B	
Chloromethane	ND	1.0	ug/L	SW846 8260B	
Cyclohexane	ND	1.0	ug/L	SW846 8260B	
Dibromochloromethane	ND	1.0	ug/L	SW846 8260B	
1,2-Dibromo-3-chloro-propane	ND	1.0	ug/L	SW846 8260B	

(Continued on next page)

SEVERN TRENT LABORATORIES, INC.

PRELIMINARY DATA SUMMARY

The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Conestoga Rovers & Assoc., Inc

Lot #: A4F170188

WOLVERINE GASKET

Project Number: 35298

Date Reported: 6/30/04

Client Sample ID: GW-35298-061604-BF-005

Sample #: 006 Date Sampled: 06/16/04 13:30 Date Received: 06/17/04 Matrix: WATER

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD	
Volatile Organics by GC/MS					In Review
1,2-Dibromoethane	ND	1.0	ug/L	SW846 8260B	
1,2-Dichlorobenzene	ND	1.0	ug/L	SW846 8260B	
1,3-Dichlorobenzene	ND	1.0	ug/L	SW846 8260B	
1,4-Dichlorobenzene	ND	1.0	ug/L	SW846 8260B	
Dichlorodifluoromethane	ND	1.0	ug/L	SW846 8260B	
1,1-Dichloroethane	ND	1.0	ug/L	SW846 8260B	
1,2-Dichloroethane	ND	1.0	ug/L	SW846 8260B	
1,1-Dichloroethene	ND	1.0	ug/L	SW846 8260B	
cis-1,2-Dichloroethene	ND	1.0	ug/L	SW846 8260B	
trans-1,2-Dichloroethene	ND	1.0	ug/L	SW846 8260B	
1,2-Dichloropropane	ND	1.0	ug/L	SW846 8260B	
cis-1,3-Dichloropropene	ND	1.0	ug/L	SW846 8260B	
trans-1,3-Dichloropropene	ND	1.0	ug/L	SW846 8260B	
Ethylbenzene	**1.3**	**1.0**	**ug/L**	**SW846 8260B**	
2-Hexanone	ND	50	ug/L	SW846 8260B	
Isopropylbenzene	ND	5.0	ug/L	SW846 8260B	
Methyl acetate	ND	10	ug/L	SW846 8260B	
Methylene chloride	ND	5.0	ug/L	SW846 8260B	
Methylcyclohexane	ND	1.0	ug/L	SW846 8260B	
4-Methyl-2-pentanone	ND	50	ug/L	SW846 8260B	
Methyl tert-butyl ether	ND	5.0	ug/L	SW846 8260B	
Styrene	ND	1.0	ug/L	SW846 8260B	
1,1,2,2-Tetrachloroethane	ND	1.0	ug/L	SW846 8260B	
Tetrachloroethene	ND	1.0	ug/L	SW846 8260B	
Toluene	**5.2**	**1.0**	**ug/L**	**SW846 8260B**	
1,2,4-Trichloro-benzene	ND	5.0	ug/L	SW846 8260B	
1,1,1-Trichloroethane	ND	1.0	ug/L	SW846 8260B	
1,1,2-Trichloroethane	ND	1.0	ug/L	SW846 8260B	
Trichloroethene	ND	1.0	ug/L	SW846 8260B	
Trichlorofluoromethane	ND	1.0	ug/L	SW846 8260B	
1,1,2-Trichloro-1,2,2-trifluoroethane	ND	1.0	ug/L	SW846 8260B	
Vinyl chloride	ND	1.0	ug/L	SW846 8260B	
Xylenes (total)	**2.9**	**2.0**	**ug/L**	**SW846 8260B**	

(Continued on next page)

SEVERN TRENT LABORATORIES, INC.

PRELIMINARY DATA SUMMARY

The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Conestoga Rovers & Assoc., Inc

Lot #: A4F170188 WOLVERINE GASKET **Date Reported:** 6/30/04

Project Number: 35298

Client Sample ID: S-35298-061604-BF-007

Sample #: 007 Date Sampled: 06/16/04 14:10 Date Received: 06/17/04 Matrix: SOLID

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD
Volatile Organics by GC/MS				In Review
1,2,4-Trimethylbenzene	ND	270	ug/kg	SW846 8260B
Acetone	ND	810	ug/kg	SW846 8260B
Benzene	ND	54	ug/kg	SW846 8260B
Bromodichloromethane	ND	110	ug/kg	SW846 8260B
Bromoform	ND	110	ug/kg	SW846 8260B
Bromomethane	ND	270	ug/kg	SW846 8260B
2-Butanone	ND	810	ug/kg	SW846 8260B
Carbon disulfide	ND	270	ug/kg	SW846 8260B
Carbon tetrachloride	ND	54	ug/kg	SW846 8260B
Chlorobenzene	ND	54	ug/kg	SW846 8260B
Chloroethane	ND	270	ug/kg	SW846 8260B
Chloroform	ND	54	ug/kg	SW846 8260B
Chloromethane	ND	270	ug/kg	SW846 8260B
Cyclohexane	ND	1300	ug/kg	SW846 8260B
Dibromochloromethane	ND	54	ug/kg	SW846 8260B
1,2-Dibromo-3-chloro-propane	ND	270	ug/kg	SW846 8260B
1,2-Dibromoethane	ND	270	ug/kg	SW846 8260B
1,2-Dichlorobenzene	ND	110	ug/kg	SW846 8260B
1,3-Dichlorobenzene	ND	110	ug/kg	SW846 8260B
1,4-Dichlorobenzene	ND	110	ug/kg	SW846 8260B
Dichlorodifluoromethane	ND	110	ug/kg	SW846 8260B
1,1-Dichloroethane	ND	54	ug/kg	SW846 8260B
1,2-Dichloroethane	ND	54	ug/kg	SW846 8260B
1,1-Dichloroethene	ND	54	ug/kg	SW846 8260B
cis-1,2-Dichloroethene	ND	54	ug/kg	SW846 8260B
trans-1,2-Dichloroethene	ND	54	ug/kg	SW846 8260B
1,2-Dichloropropane	ND	54	ug/kg	SW846 8260B
cis-1,3-Dichloropropene	ND	54	ug/kg	SW846 8260B
trans-1,3-Dichloropropene	ND	54	ug/kg	SW846 8260B
Ethylbenzene	ND	54	ug/kg	SW846 8260B
2-Hexanone	ND	2700	ug/kg	SW846 8260B
Isopropylbenzene	ND	270	ug/kg	SW846 8260B
Methyl acetate	ND	1300	ug/kg	SW846 8260B
Methylene chloride	ND	270	ug/kg	SW846 8260B
Methylcyclohexane	ND	1300	ug/kg	SW846 8260B
4-Methyl-2-pentanone	ND	2700	ug/kg	SW846 8260B

(Continued on next page)

SEVERN TRENT LABORATORIES, INC.

PRELIMINARY DATA SUMMARY

The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Conestoga Rovers & Assoc., Inc

Lot #: A4F170188

WOLVERINE GASKET

Project Number: 35298

Date Reported: 6/30/04

Client Sample ID: S-35298-061604-BF-007

Sample #: 007 Date Sampled: 06/16/04 14:10 Date Received: 06/17/04 Matrix: SOLID

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD	
Volatile Organics by GC/MS					In Review
Methyl tert-butyl ether	ND	270	ug/kg	SW846 8260B	
Styrene	ND	54	ug/kg	SW846 8260B	
1,1,2,2-Tetrachloroethane	ND	110	ug/kg	SW846 8260B	
Tetrachloroethene	ND	54	ug/kg	SW846 8260B	
Toluene	ND	110	ug/kg	SW846 8260B	
1,2,4-Trichloro-benzene	ND	270	ug/kg	SW846 8260B	
1,1,1-Trichloroethane	ND	54	ug/kg	SW846 8260B	
1,1,2-Trichloroethane	ND	54	ug/kg	SW846 8260B	
Trichloroethene	ND	54	ug/kg	SW846 8260B	
Trichlorofluoromethane	ND	110	ug/kg	SW846 8260B	
1,1,2-Trichloro-1,2,2-trifluoroethane	ND	270	ug/kg	SW846 8260B	
Vinyl chloride	ND	110	ug/kg	SW846 8260B	
Xylenes (total)	ND	540	ug/kg	SW846 8260B	

Results and reporting limits have been adjusted for dry weight.

Inorganic Analysis					Reviewed
Total Residue as Percent Solids	**83.3**	**10.0**	**%**	**MCAWW 160.3 MOD**	

Client Sample ID: S-35298-061604-BF-008

Sample #: 008 Date Sampled: 06/16/04 14:47 Date Received: 06/17/04 Matrix: SOLID

Volatile Organics by GC/MS					In Review
1,2,4-Trimethylbenzene	ND	53000	ug/kg	SW846 8260B	
Acetone	ND	160000	ug/kg	SW846 8260B	
Benzene	ND	11000	ug/kg	SW846 8260B	
Bromodichloromethane	ND	21000	ug/kg	SW846 8260B	
Bromoform	ND	21000	ug/kg	SW846 8260B	
Bromomethane	ND	53000	ug/kg	SW846 8260B	
2-Butanone	ND	160000	ug/kg	SW846 8260B	
Carbon disulfide	ND	53000	ug/kg	SW846 8260B	
Carbon tetrachloride	ND	11000	ug/kg	SW846 8260B	
Chlorobenzene	**520000**	**11000**	**ug/kg**	**SW846 8260B**	

(Continued on next page)

SEVERN TRENT LABORATORIES, INC.

PRELIMINARY DATA SUMMARY

The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Conestoga Rovers & Assoc., Inc
WOLVERINE GASKET
Project Number: 35298

Lot #: A4F170188 **Date Reported:** 6/30/04

Client Sample ID: S-35298-061604-BF-008
Sample #: 008 Date Sampled: 06/16/04 14:47 Date Received: 06/17/04 Matrix: SOLID

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD	
Volatile Organics by GC/MS					In Review
Chloroethane	ND	53000	ug/kg	SW846 8260B	
Chloroform	ND	11000	ug/kg	SW846 8260B	
Chloromethane	ND	53000	ug/kg	SW846 8260B	
Cyclohexane	ND	250000	ug/kg	SW846 8260B	
Dibromochloromethane	ND	11000	ug/kg	SW846 8260B	
1,2-Dibromo-3-chloro-propane	ND	53000	ug/kg	SW846 8260B	
1,2-Dibromoethane	ND	53000	ug/kg	SW846 8260B	
1,2-Dichlorobenzene	ND	21000	ug/kg	SW846 8260B	
1,3-Dichlorobenzene	ND	21000	ug/kg	SW846 8260B	
1,4-Dichlorobenzene	ND	21000	ug/kg	SW846 8260B	
Dichlorodifluoromethane	ND	21000	ug/kg	SW846 8260B	
1,1-Dichloroethane	ND	11000	ug/kg	SW846 8260B	
1,2-Dichloroethane	ND	11000	ug/kg	SW846 8260B	
1,1-Dichloroethene	ND	11000	ug/kg	SW846 8260B	
cis-1,2-Dichloroethene	ND	11000	ug/kg	SW846 8260B	
trans-1,2-Dichloroethene	ND	11000	ug/kg	SW846 8260B	
1,2-Dichloropropane	ND	11000	ug/kg	SW846 8260B	
cis-1,3-Dichloropropene	ND	11000	ug/kg	SW846 8260B	
trans-1,3-Dichloropropene	ND	11000	ug/kg	SW846 8260B	
Ethylbenzene	**58000**	**11000**	**ug/kg**	**SW846 8260B**	
2-Hexanone	ND	530000	ug/kg	SW846 8260B	
Isopropylbenzene	ND	53000	ug/kg	SW846 8260B	
Methyl acetate	ND	250000	ug/kg	SW846 8260B	
Methylene chloride	ND	53000	ug/kg	SW846 8260B	
Methylcyclohexane	ND	250000	ug/kg	SW846 8260B	
4-Methyl-2-pentanone	ND	530000	ug/kg	SW846 8260B	
Methyl tert-butyl ether	ND	53000	ug/kg	SW846 8260B	
Styrene	ND	11000	ug/kg	SW846 8260B	
1,1,2,2-Tetrachloroethane	ND	21000	ug/kg	SW846 8260B	
Tetrachloroethene	ND	11000	ug/kg	SW846 8260B	
Toluene	**24000**	**21000**	**ug/kg**	**SW846 8260B**	
1,2,4-Trichloro-benzene	ND	53000	ug/kg	SW846 8260B	
1,1,1-Trichloroethane	ND	11000	ug/kg	SW846 8260B	
1,1,2-Trichloroethane	ND	11000	ug/kg	SW846 8260B	
Trichloroethene	ND	11000	ug/kg	SW846 8260B	

(Continued on next page)

SEVERN TRENT LABORATORIES, INC.

PRELIMINARY DATA SUMMARY

The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Conestoga Rovers & Assoc., Inc
WOLVERINE GASKET
Project Number: 35298

Lot #: A4F170188 **Date Reported:** 6/30/04

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD	
Client Sample ID: S-35298-061604-BF-008					
Sample #: 008 Date Sampled: 06/16/04 14:47 Date Received: 06/17/04 Matrix: SOLID					
Volatile Organics by GC/MS					In Review
Trichlorofluoromethane	ND	21000	ug/kg	SW846 8260B	
1,1,2-Trichloro-1,2,2-trifluoroethane	ND	53000	ug/kg	SW846 8260B	
Vinyl chloride	ND	21000	ug/kg	SW846 8260B	
Xylenes (total)	**260000**	**110000**	**ug/kg**	**SW846 8260B**	
Results and reporting limits have been adjusted for dry weight.					
Inorganic Analysis					Reviewed
Total Residue as Percent Solids	**78.0**	**10.0**	**%**	**MCAWW 160.3 MOD**	
Client Sample ID: TRIP BLANK-35298-061604-BF-009					
Sample #: 009 Date Sampled: 06/16/04 14:47 Date Received: 06/17/04 Matrix: WATER					
Volatile Organics by GC/MS					In Review
1,2,4-Trimethylbenzene	ND	1.0	ug/L	SW846 8260B	
Acetone	ND	25	ug/L	SW846 8260B	
Benzene	ND	1.0	ug/L	SW846 8260B	
Bromodichloromethane	ND	1.0	ug/L	SW846 8260B	
Bromoform	ND	1.0	ug/L	SW846 8260B	
Bromomethane	ND	1.0	ug/L	SW846 8260B	
2-Butanone	ND	25	ug/L	SW846 8260B	
Carbon disulfide	ND	5.0	ug/L	SW846 8260B	
Carbon tetrachloride	ND	1.0	ug/L	SW846 8260B	
Chlorobenzene	ND	1.0	ug/L	SW846 8260B	
Chloroethane	ND	1.0	ug/L	SW846 8260B	
Chloroform	ND	1.0	ug/L	SW846 8260B	
Chloromethane	ND	1.0	ug/L	SW846 8260B	
Cyclohexane	ND	1.0	ug/L	SW846 8260B	
Dibromochloromethane	ND	1.0	ug/L	SW846 8260B	
1,2-Dibromo-3-chloro-propane	ND	1.0	ug/L	SW846 8260B	
1,2-Dibromoethane	ND	1.0	ug/L	SW846 8260B	
1,2-Dichlorobenzene	ND	1.0	ug/L	SW846 8260B	
1,3-Dichlorobenzene	ND	1.0	ug/L	SW846 8260B	

(Continued on next page)

SEVERN TRENT LABORATORIES, INC.

PRELIMINARY DATA SUMMARY

The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Conestoga Rovers & Assoc., Inc
WOLVERINE GASKET
Project Number: 35298

Lot #: A4F170188 **Date Reported:** 6/30/04

Client Sample ID: TRIP BLANK-35298-061604-BF-009
Sample #: 009 Date Sampled: 06/16/04 14:47 Date Received: 06/17/04 Matrix: WATER

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD	
Volatile Organics by GC/MS					In Review
1,4-Dichlorobenzene	ND	1.0	ug/L	SW846 8260B	
Dichlorodifluoromethane	ND	1.0	ug/L	SW846 8260B	
1,1-Dichloroethane	ND	1.0	ug/L	SW846 8260B	
1,2-Dichloroethane	ND	1.0	ug/L	SW846 8260B	
1,1-Dichloroethene	ND	1.0	ug/L	SW846 8260B	
cis-1,2-Dichloroethene	ND	1.0	ug/L	SW846 8260B	
trans-1,2-Dichloroethene	ND	1.0	ug/L	SW846 8260B	
1,2-Dichloropropane	ND	1.0	ug/L	SW846 8260B	
cis-1,3-Dichloropropene	ND	1.0	ug/L	SW846 8260B	
trans-1,3-Dichloropropene	ND	1.0	ug/L	SW846 8260B	
Ethylbenzene	ND	1.0	ug/L	SW846 8260B	
2-Hexanone	ND	50	ug/L	SW846 8260B	
Isopropylbenzene	ND	5.0	ug/L	SW846 8260B	
Methyl acetate	ND	10	ug/L	SW846 8260B	
Methylene chloride	ND	5.0	ug/L	SW846 8260B	
Methylcyclohexane	ND	1.0	ug/L	SW846 8260B	
4-Methyl-2-pentanone	ND	50	ug/L	SW846 8260B	
Methyl tert-butyl ether	ND	5.0	ug/L	SW846 8260B	
Styrene	ND	1.0	ug/L	SW846 8260B	
1,1,2,2-Tetrachloroethane	ND	1.0	ug/L	SW846 8260B	
Tetrachloroethene	ND	1.0	ug/L	SW846 8260B	
Toluene	ND	1.0	ug/L	SW846 8260B	
1,2,4-Trichloro-benzene	ND	5.0	ug/L	SW846 8260B	
1,1,1-Trichloroethane	ND	1.0	ug/L	SW846 8260B	
1,1,2-Trichloroethane	ND	1.0	ug/L	SW846 8260B	
Trichloroethene	ND	1.0	ug/L	SW846 8260B	
Trichlorofluoromethane	ND	1.0	ug/L	SW846 8260B	
1,1,2-Trichloro-1,2,2-trifluoroethane	ND	1.0	ug/L	SW846 8260B	
Vinyl chloride	ND	1.0	ug/L	SW846 8260B	
Xylenes (total)	ND	2.0	ug/L	SW846 8260B	

(Continued on next page)

SEVERN TRENT LABORATORIES, INC.

PRELIMINARY DATA SUMMARY

The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Conestoga Rovers & Assoc., Inc
WOLVERINE GASKET
Project Number: 35298

Lot #: A4F170188 **Date Reported:** 6/30/04

Client Sample ID: S-35298-061604-BF-010
Sample #: 010 Date Sampled: 06/16/04 11:40 Date Received: 06/17/04 Matrix: SOLID

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD
Volatile Organics by GC/MS				In Review
1,2,4-Trimethylbenzene	ND	46000	ug/kg	SW846 8260B
Acetone	ND	140000	ug/kg	SW846 8260B
Benzene	ND	9300	ug/kg	SW846 8260B
Bromodichloromethane	ND	19000	ug/kg	SW846 8260B
Bromoform	ND	19000	ug/kg	SW846 8260B
Bromomethane	ND	46000	ug/kg	SW846 8260B
2-Butanone	ND	140000	ug/kg	SW846 8260B
Carbon disulfide	ND	46000	ug/kg	SW846 8260B
Carbon tetrachloride	ND	9300	ug/kg	SW846 8260B
Chlorobenzene	**260000**	**9300**	**ug/kg**	**SW846 8260B**
Chloroethane	ND	46000	ug/kg	SW846 8260B
Chloroform	ND	9300	ug/kg	SW846 8260B
Chloromethane	ND	46000	ug/kg	SW846 8260B
Cyclohexane	ND	220000	ug/kg	SW846 8260B
Dibromochloromethane	ND	9300	ug/kg	SW846 8260B
1,2-Dibromo-3-chloro-propane	ND	46000	ug/kg	SW846 8260B
1,2-Dibromoethane	ND	46000	ug/kg	SW846 8260B
1,2-Dichlorobenzene	ND	19000	ug/kg	SW846 8260B
1,3-Dichlorobenzene	ND	19000	ug/kg	SW846 8260B
1,4-Dichlorobenzene	ND	19000	ug/kg	SW846 8260B
Dichlorodifluoromethane	ND	19000	ug/kg	SW846 8260B
1,1-Dichloroethane	ND	9300	ug/kg	SW846 8260B
1,2-Dichloroethane	ND	9300	ug/kg	SW846 8260B
1,1-Dichloroethene	ND	9300	ug/kg	SW846 8260B
cis-1,2-Dichloroethene	ND	9300	ug/kg	SW846 8260B
trans-1,2-Dichloroethene	ND	9300	ug/kg	SW846 8260B
1,2-Dichloropropane	ND	9300	ug/kg	SW846 8260B
cis-1,3-Dichloropropene	ND	9300	ug/kg	SW846 8260B
trans-1,3-Dichloropropene	ND	9300	ug/kg	SW846 8260B
Ethylbenzene	**22000**	**9300**	**ug/kg**	**SW846 8260B**
2-Hexanone	ND	460000	ug/kg	SW846 8260B
Isopropylbenzene	ND	46000	ug/kg	SW846 8260B
Methyl acetate	ND	220000	ug/kg	SW846 8260B
Methylene chloride	ND	46000	ug/kg	SW846 8260B
Methylcyclohexane	ND	220000	ug/kg	SW846 8260B
4-Methyl-2-pentanone	ND	460000	ug/kg	SW846 8260B

(Continued on next page)

SEVERN TRENT LABORATORIES, INC.

PRELIMINARY DATA SUMMARY

The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Lot #: A4F170188

Conestoga Rovers & Assoc., Inc
WOLVERINE GASKET
Project Number: 35298

Date Reported: 6/30/04

Client Sample ID: S-35298-061604-BF-010
Sample #: 010 Date Sampled: 06/16/04 11:40 Date Received: 06/17/04 Matrix: SOLID

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD	
Volatile Organics by GC/MS					In Review
Methyl tert-butyl ether	ND	46000	ug/kg	SW846 8260B	
Styrene	ND	9300	ug/kg	SW846 8260B	
1,1,2,2-Tetrachloroethane	ND	19000	ug/kg	SW846 8260B	
Tetrachloroethene	ND	9300	ug/kg	SW846 8260B	
Toluene	**63000**	**19000**	**ug/kg**	**SW846 8260B**	
1,2,4-Trichloro-benzene	ND	46000	ug/kg	SW846 8260B	
1,1,1-Trichloroethane	ND	9300	ug/kg	SW846 8260B	
1,1,2-Trichloroethane	ND	9300	ug/kg	SW846 8260B	
Trichloroethene	ND	9300	ug/kg	SW846 8260B	
Trichlorofluoromethane	ND	19000	ug/kg	SW846 8260B	
1,1,2-Trichloro-1,2,2-trifluoroethane	ND	46000	ug/kg	SW846 8260B	
Vinyl chloride	ND	19000	ug/kg	SW846 8260B	
Xylenes (total)	**100000**	**93000**	**ug/kg**	**SW846 8260B**	

Results and reporting limits have been adjusted for dry weight.

Inorganic Analysis					Reviewed
Total Residue as Percent Solids	**90.7**	**10.0**	**%**	**MCAWW 160.3 MOD**	

Client Sample ID: S-35298-061604-BF-011
Sample #: 011 Date Sampled: 06/16/04 15:10 Date Received: 06/17/04 Matrix: SOLID

Volatile Organics by GC/MS					In Review
1,2,4-Trimethylbenzene	ND	29000	ug/kg	SW846 8260B	
Acetone	ND	86000	ug/kg	SW846 8260B	
Benzene	ND	5800	ug/kg	SW846 8260B	
Bromodichloromethane	ND	12000	ug/kg	SW846 8260B	
Bromoform	ND	12000	ug/kg	SW846 8260B	
Bromomethane	ND	29000	ug/kg	SW846 8260B	
2-Butanone	ND	86000	ug/kg	SW846 8260B	
Carbon disulfide	ND	29000	ug/kg	SW846 8260B	
Carbon tetrachloride	ND	5800	ug/kg	SW846 8260B	
Chlorobenzene	**150000**	**5800**	**ug/kg**	**SW846 8260B**	

(Continued on next page)

SEVERN TRENT LABORATORIES, INC.

PRELIMINARY DATA SUMMARY

The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Conestoga Rovers & Assoc., Inc

Lot #: A4F170188 WOLVERINE GASKET **Date Reported:** 6/30/04

Project Number: 35298

Client Sample ID: S-35298-061604-BF-011

Sample #: 011 Date Sampled: 06/16/04 15:10 Date Received: 06/17/04 Matrix: SOLID

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD	
Volatile Organics by GC/MS					In Review
Chloroethane	ND	29000	ug/kg	SW846 8260B	
Chloroform	ND	5800	ug/kg	SW846 8260B	
Chloromethane	ND	29000	ug/kg	SW846 8260B	
Cyclohexane	ND	140000	ug/kg	SW846 8260B	
Dibromochloromethane	ND	5800	ug/kg	SW846 8260B	
1,2-Dibromo-3-chloro-propane	ND	29000	ug/kg	SW846 8260B	
1,2-Dibromoethane	ND	29000	ug/kg	SW846 8260B	
1,2-Dichlorobenzene	ND	12000	ug/kg	SW846 8260B	
1,3-Dichlorobenzene	ND	12000	ug/kg	SW846 8260B	
1,4-Dichlorobenzene	ND	12000	ug/kg	SW846 8260B	
Dichlorodifluoromethane	ND	12000	ug/kg	SW846 8260B	
1,1-Dichloroethane	ND	5800	ug/kg	SW846 8260B	
1,2-Dichloroethane	ND	5800	ug/kg	SW846 8260B	
1,1-Dichloroethene	ND	5800	ug/kg	SW846 8260B	
cis-1,2-Dichloroethene	ND	5800	ug/kg	SW846 8260B	
trans-1,2-Dichloroethene	ND	5800	ug/kg	SW846 8260B	
1,2-Dichloropropane	ND	5800	ug/kg	SW846 8260B	
cis-1,3-Dichloropropene	ND	5800	ug/kg	SW846 8260B	
trans-1,3-Dichloropropene	ND	5800	ug/kg	SW846 8260B	
Ethylbenzene	**10000**	**5800**	**ug/kg**	**SW846 8260B**	
2-Hexanone	ND	290000	ug/kg	SW846 8260B	
Isopropylbenzene	ND	29000	ug/kg	SW846 8260B	
Methyl acetate	ND	140000	ug/kg	SW846 8260B	
Methylene chloride	ND	29000	ug/kg	SW846 8260B	
Methylcyclohexane	ND	140000	ug/kg	SW846 8260B	
4-Methyl-2-pentanone	ND	290000	ug/kg	SW846 8260B	
Methyl tert-butyl ether	ND	29000	ug/kg	SW846 8260B	
Styrene	ND	5800	ug/kg	SW846 8260B	
1,1,2,2-Tetrachloroethane	ND	12000	ug/kg	SW846 8260B	
Tetrachloroethene	ND	5800	ug/kg	SW846 8260B	
Toluene	**53000**	**12000**	**ug/kg**	**SW846 8260B**	
1,2,4-Trichloro-benzene	ND	29000	ug/kg	SW846 8260B	
1,1,1-Trichloroethane	ND	5800	ug/kg	SW846 8260B	
1,1,2-Trichloroethane	ND	5800	ug/kg	SW846 8260B	
Trichloroethene	ND	5800	ug/kg	SW846 8260B	

(Continued on next page)

SEVERN TRENT LABORATORIES, INC.

PRELIMINARY DATA SUMMARY

The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Conestoga Rovers & Assoc., Inc
WOLVERINE GASKET
Project Number: 35298

Lot #: A4F170188 **Date Reported:** 6/30/04

Client Sample ID: S-35298-061604-BF-011
Sample #: 011 Date Sampled: 06/16/04 15:10 Date Received: 06/17/04 Matrix: SOLID

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD	
Volatile Organics by GC/MS					In Review
Trichlorofluoromethane	ND	12000	ug/kg	SW846 8260B	
1,1,2-Trichloro-1,2,2-trifluoroethane	ND	29000	ug/kg	SW846 8260B	
Vinyl chloride	ND	12000	ug/kg	SW846 8260B	
Xylenes (total)	ND	58000	ug/kg	SW846 8260B	

Results and reporting limits have been adjusted for dry weight.

Inorganic Analysis					Reviewed
Total Residue as Percent Solids	**82.4**	**10.0**	**%**	**MCAWW 160.3 MOD**	

Client Sample ID: S-35298-061604-BF-012
Sample #: 012 Date Sampled: 06/16/04 15:20 Date Received: 06/17/04 Matrix: SOLID

Volatile Organics by GC/MS					In Review
1,2,4-Trimethylbenzene	ND	2700000	ug/kg	SW846 8260B	
Acetone	ND	8100000	ug/kg	SW846 8260B	
Benzene	ND	540000	ug/kg	SW846 8260B	
Bromodichloromethane	ND	1100000	ug/kg	SW846 8260B	
Bromoform	ND	1100000	ug/kg	SW846 8260B	
Bromomethane	ND	2700000	ug/kg	SW846 8260B	
2-Butanone	ND	8100000	ug/kg	SW846 8260B	
Carbon disulfide	ND	2700000	ug/kg	SW846 8260B	
Carbon tetrachloride	ND	540000	ug/kg	SW846 8260B	
Chlorobenzene	**15000000**	**540000**	**ug/kg**	**SW846 8260B**	
Chloroethane	ND	2700000	ug/kg	SW846 8260B	
Chloroform	ND	540000	ug/kg	SW846 8260B	
Chloromethane	ND	2700000	ug/kg	SW846 8260B	
Cyclohexane	ND	13000000	ug/kg	SW846 8260B	
Dibromochloromethane	ND	540000	ug/kg	SW846 8260B	
1,2-Dibromo-3-chloro-propane	ND	2700000	ug/kg	SW846 8260B	
1,2-Dibromoethane	ND	2700000	ug/kg	SW846 8260B	
1,2-Dichlorobenzene	ND	1100000	ug/kg	SW846 8260B	
1,3-Dichlorobenzene	ND	1100000	ug/kg	SW846 8260B	

(Continued on next page)

SEVERN TRENT LABORATORIES, INC.

PRELIMINARY DATA SUMMARY

The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Conestoga Rovers & Assoc., Inc

Lot #: A4F170188 WOLVERINE GASKET **Date Reported:** 6/30/04

Project Number: 35298

Client Sample ID: S-35298-061604-BF-012

Sample #: 012 Date Sampled: 06/16/04 15:20 Date Received: 06/17/04 Matrix: SOLID

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD	
Volatile Organics by GC/MS					In Review
1,4-Dichlorobenzene	ND	1100000	ug/kg	SW846 8260B	
Dichlorodifluoromethane	ND	1100000	ug/kg	SW846 8260B	
1,1-Dichloroethane	ND	540000	ug/kg	SW846 8260B	
1,2-Dichloroethane	ND	540000	ug/kg	SW846 8260B	
1,1-Dichloroethene	ND	540000	ug/kg	SW846 8260B	
cis-1,2-Dichloroethene	ND	540000	ug/kg	SW846 8260B	
trans-1,2-Dichloroethene	ND	540000	ug/kg	SW846 8260B	
1,2-Dichloropropane	ND	540000	ug/kg	SW846 8260B	
cis-1,3-Dichloropropene	ND	540000	ug/kg	SW846 8260B	
trans-1,3-Dichloropropene	ND	540000	ug/kg	SW846 8260B	
Ethylbenzene	**1300000**	**540000**	**ug/kg**	**SW846 8260B**	
2-Hexanone	ND	27000000	ug/kg	SW846 8260B	
Isopropylbenzene	ND	2700000	ug/kg	SW846 8260B	
Methyl acetate	ND	13000000	ug/kg	SW846 8260B	
Methylene chloride	ND	2700000	ug/kg	SW846 8260B	
Methylcyclohexane	ND	13000000	ug/kg	SW846 8260B	
4-Methyl-2-pentanone	ND	27000000	ug/kg	SW846 8260B	
Methyl tert-butyl ether	ND	2700000	ug/kg	SW846 8260B	
Styrene	ND	540000	ug/kg	SW846 8260B	
1,1,2,2-Tetrachloroethane	ND	1100000	ug/kg	SW846 8260B	
Tetrachloroethene	ND	540000	ug/kg	SW846 8260B	
Toluene	**3800000**	**1100000**	**ug/kg**	**SW846 8260B**	
1,2,4-Trichloro-benzene	ND	2700000	ug/kg	SW846 8260B	
1,1,1-Trichloroethane	ND	540000	ug/kg	SW846 8260B	
1,1,2-Trichloroethane	ND	540000	ug/kg	SW846 8260B	
Trichloroethene	ND	540000	ug/kg	SW846 8260B	
Trichlorofluoromethane	ND	1100000	ug/kg	SW846 8260B	
1,1,2-Trichloro-1,2,2-trifluoroethane	ND	2700000	ug/kg	SW846 8260B	
Vinyl chloride	ND	1100000	ug/kg	SW846 8260B	
Xylenes (total)	**5800000**	**5400000**	**ug/kg**	**SW846 8260B**	

Results and reporting limits have been adjusted for dry weight.

(Continued on next page)

SEVERN TRENT LABORATORIES, INC.

PRELIMINARY DATA SUMMARY

The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Conestoga Rovers & Assoc., Inc

Lot #: A4F170188 WOLVERINE GASKET **Date Reported:** 6/30/04

Project Number: 35298

Client Sample ID: S-35298-061604-BF-012

Sample #: 012 Date Sampled: 06/16/04 15:20 Date Received: 06/17/04 Matrix: SOLID

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD	
Inorganic Analysis					Reviewed
Total Residue as Percent Solids	**86.1**	**10.0**	**%**	**MCAWW 160.3 MOD**	

Client Sample ID: S-35298-061604-BF-013

Sample #: 013 Date Sampled: 06/16/04 15:36 Date Received: 06/17/04 Matrix: SOLID

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD	
Volatile Organics by GC/MS					In Review
1,2,4-Trimethylbenzene	ND	290000	ug/kg	SW846 8260B	
Acetone	ND	880000	ug/kg	SW846 8260B	
Benzene	ND	59000	ug/kg	SW846 8260B	
Bromodichloromethane	ND	120000	ug/kg	SW846 8260B	
Bromoform	ND	120000	ug/kg	SW846 8260B	
Bromomethane	ND	290000	ug/kg	SW846 8260B	
2-Butanone	ND	880000	ug/kg	SW846 8260B	
Carbon disulfide	ND	290000	ug/kg	SW846 8260B	
Carbon tetrachloride	ND	59000	ug/kg	SW846 8260B	
Chlorobenzene	**920000**	**59000**	**ug/kg**	**SW846 8260B**	
Chloroethane	ND	290000	ug/kg	SW846 8260B	
Chloroform	ND	59000	ug/kg	SW846 8260B	
Chloromethane	ND	290000	ug/kg	SW846 8260B	
Cyclohexane	ND	1400000	ug/kg	SW846 8260B	
Dibromochloromethane	ND	59000	ug/kg	SW846 8260B	
1,2-Dibromo-3-chloro-propane	ND	290000	ug/kg	SW846 8260B	
1,2-Dibromoethane	ND	290000	ug/kg	SW846 8260B	
1,2-Dichlorobenzene	ND	120000	ug/kg	SW846 8260B	
1,3-Dichlorobenzene	ND	120000	ug/kg	SW846 8260B	
1,4-Dichlorobenzene	ND	120000	ug/kg	SW846 8260B	
Dichlorodifluoromethane	ND	120000	ug/kg	SW846 8260B	
1,1-Dichloroethane	ND	59000	ug/kg	SW846 8260B	
1,2-Dichloroethane	ND	59000	ug/kg	SW846 8260B	
1,1-Dichloroethene	ND	59000	ug/kg	SW846 8260B	
cis-1,2-Dichloroethene	ND	59000	ug/kg	SW846 8260B	
trans-1,2-Dichloroethene	ND	59000	ug/kg	SW846 8260B	
1,2-Dichloropropane	ND	59000	ug/kg	SW846 8260B	
cis-1,3-Dichloropropene	ND	59000	ug/kg	SW846 8260B	

(Continued on next page)

SEVERN TRENT LABORATORIES, INC.

PRELIMINARY DATA SUMMARY

The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Conestoga Rovers & Assoc., Inc

Lot #: A4F170188 WOLVERINE GASKET **Date Reported:** 6/30/04

Project Number: 35298

Client Sample ID: S-35298-061604-BF-013

Sample #: 013 Date Sampled: 06/16/04 15:36 Date Received: 06/17/04 Matrix: SOLID

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD	
Volatile Organics by GC/MS					In Review
trans-1,3-Dichloropropene	ND	59000	ug/kg	SW846 8260B	
Ethylbenzene	**99000**	**59000**	**ug/kg**	**SW846 8260B**	
2-Hexanone	ND	2900000	ug/kg	SW846 8260B	
Isopropylbenzene	ND	290000	ug/kg	SW846 8260B	
Methyl acetate	ND	1400000	ug/kg	SW846 8260B	
Methylene chloride	ND	290000	ug/kg	SW846 8260B	
Methylcyclohexane	ND	1400000	ug/kg	SW846 8260B	
4-Methyl-2-pentanone	ND	2900000	ug/kg	SW846 8260B	
Methyl tert-butyl ether	ND	290000	ug/kg	SW846 8260B	
Styrene	ND	59000	ug/kg	SW846 8260B	
1,1,2,2-Tetrachloroethane	ND	120000	ug/kg	SW846 8260B	
Tetrachloroethene	ND	59000	ug/kg	SW846 8260B	
Toluene	**440000**	**120000**	**ug/kg**	**SW846 8260B**	
1,2,4-Trichloro-benzene	ND	290000	ug/kg	SW846 8260B	
1,1,1-Trichloroethane	ND	59000	ug/kg	SW846 8260B	
1,1,2-Trichloroethane	ND	59000	ug/kg	SW846 8260B	
Trichloroethene	ND	59000	ug/kg	SW846 8260B	
Trichlorofluoromethane	ND	120000	ug/kg	SW846 8260B	
1,1,2-Trichloro-1,2,2-trifluoroethane	ND	290000	ug/kg	SW846 8260B	
Vinyl chloride	ND	120000	ug/kg	SW846 8260B	
Xylenes (total)	ND	590000	ug/kg	SW846 8260B	

Results and reporting limits have been adjusted for dry weight.

Volatile Organics by GC/MS					In Review
1,2,4-Trimethylbenzene	ND	59000	ug/kg	SW846 8260B	
Acetone	ND	180000	ug/kg	SW846 8260B	
Benzene	ND	12000	ug/kg	SW846 8260B	
Bromodichloromethane	ND	23000	ug/kg	SW846 8260B	
Bromoform	ND	23000	ug/kg	SW846 8260B	
Bromomethane	ND	59000	ug/kg	SW846 8260B	
2-Butanone	ND	180000	ug/kg	SW846 8260B	
Carbon disulfide	ND	59000	ug/kg	SW846 8260B	
Carbon tetrachloride	ND	12000	ug/kg	SW846 8260B	
Chlorobenzene	**1400000 E**	**12000**	**ug/kg**	**SW846 8260B**	

(Continued on next page)

SEVERN TRENT LABORATORIES, INC.

PRELIMINARY DATA SUMMARY

The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Conestoga Rovers & Assoc., Inc

Lot #: A4F170188

WOLVERINE GASKET

Project Number: 35298

Date Reported: 6/30/04

Client Sample ID: S-35298-061604-BF-013

Sample #: 013 Date Sampled: 06/16/04 15:36 Date Received: 06/17/04 Matrix: SOLID

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD	
Volatile Organics by GC/MS					In Review
Chloroethane	ND	59000	ug/kg	SW846 8260B	
Chloroform	ND	12000	ug/kg	SW846 8260B	
Chloromethane	ND	59000	ug/kg	SW846 8260B	
Cyclohexane	ND	280000	ug/kg	SW846 8260B	
Dibromochloromethane	ND	12000	ug/kg	SW846 8260B	
1,2-Dibromo-3-chloro-propane	ND	59000	ug/kg	SW846 8260B	
1,2-Dibromoethane	ND	59000	ug/kg	SW846 8260B	
1,2-Dichlorobenzene	ND	23000	ug/kg	SW846 8260B	
1,3-Dichlorobenzene	ND	23000	ug/kg	SW846 8260B	
1,4-Dichlorobenzene	ND	23000	ug/kg	SW846 8260B	
Dichlorodifluoromethane	ND	23000	ug/kg	SW846 8260B	
1,1-Dichloroethane	ND	12000	ug/kg	SW846 8260B	
1,2-Dichloroethane	ND	12000	ug/kg	SW846 8260B	
1,1-Dichloroethene	ND	12000	ug/kg	SW846 8260B	
cis-1,2-Dichloroethene	ND	12000	ug/kg	SW846 8260B	
trans-1,2-Dichloroethene	ND	12000	ug/kg	SW846 8260B	
1,2-Dichloropropane	ND	12000	ug/kg	SW846 8260B	
cis-1,3-Dichloropropene	ND	12000	ug/kg	SW846 8260B	
trans-1,3-Dichloropropene	ND	12000	ug/kg	SW846 8260B	
Ethylbenzene	**160000**	**12000**	**ug/kg**	**SW846 8260B**	
2-Hexanone	ND	590000	ug/kg	SW846 8260B	
Isopropylbenzene	ND	59000	ug/kg	SW846 8260B	
Methyl acetate	ND	280000	ug/kg	SW846 8260B	
Methylene chloride	ND	59000	ug/kg	SW846 8260B	
Methylcyclohexane	ND	280000	ug/kg	SW846 8260B	
4-Methyl-2-pentanone	ND	590000	ug/kg	SW846 8260B	
Methyl tert-butyl ether	ND	59000	ug/kg	SW846 8260B	
Styrene	ND	12000	ug/kg	SW846 8260B	
1,1,2,2-Tetrachloroethane	ND	23000	ug/kg	SW846 8260B	
Tetrachloroethene	ND	12000	ug/kg	SW846 8260B	
Toluene	**690000 E**	**23000**	**ug/kg**	**SW846 8260B**	
1,2,4-Trichloro-benzene	ND	59000	ug/kg	SW846 8260B	
1,1,1-Trichloroethane	ND	12000	ug/kg	SW846 8260B	
1,1,2-Trichloroethane	ND	12000	ug/kg	SW846 8260B	
Trichloroethene	ND	12000	ug/kg	SW846 8260B	

(Continued on next page)

SEVERN TRENT LABORATORIES, INC.

PRELIMINARY DATA SUMMARY

The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Conestoga Rovers & Assoc., Inc

Lot #: A4F170188 — WOLVERINE GASKET — **Date Reported:** 6/30/04

Project Number: 35298

Client Sample ID: S-35298-061604-BF-013

Sample #: 013 Date Sampled: 06/16/04 15:36 Date Received: 06/17/04 Matrix: SOLID

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD	
Volatile Organics by GC/MS					In Review
Trichlorofluoromethane	ND	23000	ug/kg	SW846 8260B	
1,1,2-Trichloro-1,2,2-trifluoroethane	ND	59000	ug/kg	SW846 8260B	
Vinyl chloride	ND	23000	ug/kg	SW846 8260B	
Xylenes (total)	**650000**	**120000**	**ug/kg**	**SW846 8260B**	

Results and reporting limits have been adjusted for dry weight.

E Estimated result. Result concentration exceeds the calibration range.

Inorganic Analysis					Reviewed
Total Residue as Percent Solids	**86.5**	**10.0**	**%**	**MCAWW 160.3 MOD**	

Client Sample ID: S-35298-061604-BF-014

Sample #: 014 Date Sampled: 06/16/04 15:50 Date Received: 06/17/04 Matrix: SOLID

Volatile Organics by GC/MS					In Review
1,2,4-Trimethylbenzene	ND	5400	ug/kg	SW846 8260B	
Acetone	ND	16000	ug/kg	SW846 8260B	
Benzene	ND	1100	ug/kg	SW846 8260B	
Bromodichloromethane	ND	2200	ug/kg	SW846 8260B	
Bromoform	ND	2200	ug/kg	SW846 8260B	
Bromomethane	ND	5400	ug/kg	SW846 8260B	
2-Butanone	ND	16000	ug/kg	SW846 8260B	
Carbon disulfide	ND	5400	ug/kg	SW846 8260B	
Carbon tetrachloride	ND	1100	ug/kg	SW846 8260B	
Chlorobenzene	**37000**	**1100**	**ug/kg**	**SW846 8260B**	
Chloroethane	ND	5400	ug/kg	SW846 8260B	
Chloroform	ND	1100	ug/kg	SW846 8260B	
Chloromethane	ND	5400	ug/kg	SW846 8260B	
Cyclohexane	ND	26000	ug/kg	SW846 8260B	
Dibromochloromethane	ND	1100	ug/kg	SW846 8260B	
1,2-Dibromo-3-chloro-propane	ND	5400	ug/kg	SW846 8260B	
1,2-Dibromoethane	ND	5400	ug/kg	SW846 8260B	
1,2-Dichlorobenzene	ND	2200	ug/kg	SW846 8260B	

(Continued on next page)

SEVERN TRENT LABORATORIES, INC.

PRELIMINARY DATA SUMMARY

The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Conestoga Rovers & Assoc., Inc
WOLVERINE GASKET
Project Number: 35298

Lot #: A4F170188 **Date Reported:** 6/30/04

Client Sample ID: S-35298-061604-BF-014
Sample #: 014 Date Sampled: 06/16/04 15:50 Date Received: 06/17/04 Matrix: SOLID

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD
Volatile Organics by GC/MS				In Review
1,3-Dichlorobenzene	ND	2200	ug/kg	SW846 8260B
1,4-Dichlorobenzene	ND	2200	ug/kg	SW846 8260B
Dichlorodifluoromethane	ND	2200	ug/kg	SW846 8260B
1,1-Dichloroethane	ND	1100	ug/kg	SW846 8260B
1,2-Dichloroethane	ND	1100	ug/kg	SW846 8260B
1,1-Dichloroethene	ND	1100	ug/kg	SW846 8260B
cis-1,2-Dichloroethene	ND	1100	ug/kg	SW846 8260B
trans-1,2-Dichloroethene	ND	1100	ug/kg	SW846 8260B
1,2-Dichloropropane	ND	1100	ug/kg	SW846 8260B
cis-1,3-Dichloropropene	ND	1100	ug/kg	SW846 8260B
trans-1,3-Dichloropropene	ND	1100	ug/kg	SW846 8260B
Ethylbenzene	**3000**	**1100**	**ug/kg**	**SW846 8260B**
2-Hexanone	ND	54000	ug/kg	SW846 8260B
Isopropylbenzene	ND	5400	ug/kg	SW846 8260B
Methyl acetate	ND	26000	ug/kg	SW846 8260B
Methylene chloride	ND	5400	ug/kg	SW846 8260B
Methylcyclohexane	ND	26000	ug/kg	SW846 8260B
4-Methyl-2-pentanone	ND	54000	ug/kg	SW846 8260B
Methyl tert-butyl ether	ND	5400	ug/kg	SW846 8260B
Styrene	ND	1100	ug/kg	SW846 8260B
1,1,2,2-Tetrachloroethane	ND	2200	ug/kg	SW846 8260B
Tetrachloroethene	ND	1100	ug/kg	SW846 8260B
Toluene	ND	2200	ug/kg	SW846 8260B
1,2,4-Trichloro-benzene	ND	5400	ug/kg	SW846 8260B
1,1,1-Trichloroethane	ND	1100	ug/kg	SW846 8260B
1,1,2-Trichloroethane	ND	1100	ug/kg	SW846 8260B
Trichloroethene	ND	1100	ug/kg	SW846 8260B
Trichlorofluoromethane	ND	2200	ug/kg	SW846 8260B
1,1,2-Trichloro-1,2,2-trifluoroethane	ND	5400	ug/kg	SW846 8260B
Vinyl chloride	ND	2200	ug/kg	SW846 8260B
Xylenes (total)	ND	11000	ug/kg	SW846 8260B

Results and reporting limits have been adjusted for dry weight.

(Continued on next page)

SEVERN TRENT LABORATORIES, INC.

PRELIMINARY DATA SUMMARY

The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Conestoga Rovers & Assoc., Inc

Lot #: A4F170188 WOLVERINE GASKET **Date Reported:** 6/30/04

Project Number: 35298

Client Sample ID: S-35298-061604-BF-014

Sample #: 014 Date Sampled: 06/16/04 15:50 Date Received: 06/17/04 Matrix: SOLID

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD	
Inorganic Analysis					Reviewed
Total Residue as Percent Solids	**86.7**	**10.0**	**%**	**MCAWW 160.3 MOD**	

Client Sample ID: S-35298-061604-BF-015

Sample #: 015 Date Sampled: 06/16/04 16:10 Date Received: 06/17/04 Matrix: SOLID

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD	
Volatile Organics by GC/MS					In Review
1,2,4-Trimethylbenzene	ND	1300000	ug/kg	SW846 8260B	
Acetone	ND	3800000	ug/kg	SW846 8260B	
Benzene	ND	260000	ug/kg	SW846 8260B	
Bromodichloromethane	ND	510000	ug/kg	SW846 8260B	
Bromoform	ND	510000	ug/kg	SW846 8260B	
Bromomethane	ND	1300000	ug/kg	SW846 8260B	
2-Butanone	ND	3800000	ug/kg	SW846 8260B	
Carbon disulfide	ND	1300000	ug/kg	SW846 8260B	
Carbon tetrachloride	ND	260000	ug/kg	SW846 8260B	
Chlorobenzene	ND	260000	ug/kg	SW846 8260B	
Chloroethane	ND	1300000	ug/kg	SW846 8260B	
Chloroform	ND	260000	ug/kg	SW846 8260B	
Chloromethane	ND	1300000	ug/kg	SW846 8260B	
Cyclohexane	ND	6200000	ug/kg	SW846 8260B	
Dibromochloromethane	ND	260000	ug/kg	SW846 8260B	
1,2-Dibromo-3-chloro-propane	ND	1300000	ug/kg	SW846 8260B	
1,2-Dibromoethane	ND	1300000	ug/kg	SW846 8260B	
1,2-Dichlorobenzene	ND	510000	ug/kg	SW846 8260B	
1,3-Dichlorobenzene	ND	510000	ug/kg	SW846 8260B	
1,4-Dichlorobenzene	ND	510000	ug/kg	SW846 8260B	
Dichlorodifluoromethane	ND	510000	ug/kg	SW846 8260B	
1,1-Dichloroethane	ND	260000	ug/kg	SW846 8260B	
1,2-Dichloroethane	ND	260000	ug/kg	SW846 8260B	
1,1-Dichloroethene	ND	260000	ug/kg	SW846 8260B	
cis-1,2-Dichloroethene	ND	260000	ug/kg	SW846 8260B	
trans-1,2-Dichloroethene	ND	260000	ug/kg	SW846 8260B	
1,2-Dichloropropane	ND	260000	ug/kg	SW846 8260B	
cis-1,3-Dichloropropene	ND	260000	ug/kg	SW846 8260B	

(Continued on next page)

SEVERN TRENT LABORATORIES, INC.

PRELIMINARY DATA SUMMARY

The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Conestoga Rovers & Assoc., Inc
WOLVERINE GASKET
Project Number: 35298

Lot #: A4F170188 **Date Reported:** 6/30/04

Client Sample ID: S-35298-061604-BF-015
Sample #: 015 Date Sampled: 06/16/04 16:10 Date Received: 06/17/04 Matrix: SOLID

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD	
Volatile Organics by GC/MS					In Review
trans-1,3-Dichloropropene	ND	260000	ug/kg	SW846 8260B	
Ethylbenzene	ND	260000	ug/kg	SW846 8260B	
2-Hexanone	ND	13000000	ug/kg	SW846 8260B	
Isopropylbenzene	ND	1300000	ug/kg	SW846 8260B	
Methyl acetate	ND	6200000	ug/kg	SW846 8260B	
Methylene chloride	ND	1300000	ug/kg	SW846 8260B	
Methylcyclohexane	ND	6200000	ug/kg	SW846 8260B	
4-Methyl-2-pentanone	ND	13000000	ug/kg	SW846 8260B	
Methyl tert-butyl ether	ND	1300000	ug/kg	SW846 8260B	
Styrene	ND	260000	ug/kg	SW846 8260B	
1,1,2,2-Tetrachloroethane	ND	510000	ug/kg	SW846 8260B	
Tetrachloroethene	ND	260000	ug/kg	SW846 8260B	
Toluene	**6200000**	**510000**	**ug/kg**	**SW846 8260B**	
1,2,4-Trichloro-benzene	ND	1300000	ug/kg	SW846 8260B	
1,1,1-Trichloroethane	ND	260000	ug/kg	SW846 8260B	
1,1,2-Trichloroethane	ND	260000	ug/kg	SW846 8260B	
Trichloroethene	ND	260000	ug/kg	SW846 8260B	
Trichlorofluoromethane	ND	510000	ug/kg	SW846 8260B	
1,1,2-Trichloro-1,2,2-trifluoroethane	ND	1300000	ug/kg	SW846 8260B	
Vinyl chloride	ND	510000	ug/kg	SW846 8260B	
Xylenes (total)	ND	2600000	ug/kg	SW846 8260B	

Results and reporting limits have been adjusted for dry weight.

Inorganic Analysis					Reviewed
Total Residue as Percent Solids	**86.7**	**10.0**	**%**	**MCAWW 160.3 MOD**	

Client Sample ID: S-35298-061604-BF-016
Sample #: 016 Date Sampled: 06/16/04 16:21 Date Received: 06/17/04 Matrix: SOLID

Volatile Organics by GC/MS					In Review
1,2,4-Trimethylbenzene	ND	130000	ug/kg	SW846 8260B	
Acetone	ND	390000	ug/kg	SW846 8260B	

(Continued on next page)

SEVERN TRENT LABORATORIES, INC.

PRELIMINARY DATA SUMMARY

The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Conestoga Rovers & Assoc., Inc
WOLVERINE GASKET
Project Number: 35298

Lot #: A4F170188 **Date Reported:** 6/30/04

Client Sample ID: S-35298-061604-BF-016
Sample #: 016 Date Sampled: 06/16/04 16:21 Date Received: 06/17/04 Matrix: SOLID

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD	
Volatile Organics by GC/MS					In Review
Benzene	ND	26000	ug/kg	SW846 8260B	
Bromodichloromethane	ND	53000	ug/kg	SW846 8260B	
Bromoform	ND	53000	ug/kg	SW846 8260B	
Bromomethane	ND	130000	ug/kg	SW846 8260B	
2-Butanone	ND	390000	ug/kg	SW846 8260B	
Carbon disulfide	ND	130000	ug/kg	SW846 8260B	
Carbon tetrachloride	ND	26000	ug/kg	SW846 8260B	
Chlorobenzene	**280000**	**26000**	**ug/kg**	**SW846 8260B**	
Chloroethane	ND	130000	ug/kg	SW846 8260B	
Chloroform	ND	26000	ug/kg	SW846 8260B	
Chloromethane	ND	130000	ug/kg	SW846 8260B	
Cyclohexane	ND	630000	ug/kg	SW846 8260B	
Dibromochloromethane	ND	26000	ug/kg	SW846 8260B	
1,2-Dibromo-3-chloro-propane	ND	130000	ug/kg	SW846 8260B	
1,2-Dibromoethane	ND	130000	ug/kg	SW846 8260B	
1,2-Dichlorobenzene	ND	53000	ug/kg	SW846 8260B	
1,3-Dichlorobenzene	ND	53000	ug/kg	SW846 8260B	
1,4-Dichlorobenzene	ND	53000	ug/kg	SW846 8260B	
Dichlorodifluoromethane	ND	53000	ug/kg	SW846 8260B	
1,1-Dichloroethane	ND	26000	ug/kg	SW846 8260B	
1,2-Dichloroethane	ND	26000	ug/kg	SW846 8260B	
1,1-Dichloroethene	ND	26000	ug/kg	SW846 8260B	
cis-1,2-Dichloroethene	ND	26000	ug/kg	SW846 8260B	
trans-1,2-Dichloroethene	ND	26000	ug/kg	SW846 8260B	
1,2-Dichloropropane	ND	26000	ug/kg	SW846 8260B	
cis-1,3-Dichloropropene	ND	26000	ug/kg	SW846 8260B	
trans-1,3-Dichloropropene	ND	26000	ug/kg	SW846 8260B	
Ethylbenzene	ND	26000	ug/kg	SW846 8260B	
2-Hexanone	ND	1300000	ug/kg	SW846 8260B	
Isopropylbenzene	ND	130000	ug/kg	SW846 8260B	
Methyl acetate	ND	630000	ug/kg	SW846 8260B	
Methylene chloride	ND	130000	ug/kg	SW846 8260B	
Methylcyclohexane	ND	630000	ug/kg	SW846 8260B	
4-Methyl-2-pentanone	ND	1300000	ug/kg	SW846 8260B	
Methyl tert-butyl ether	ND	130000	ug/kg	SW846 8260B	
Styrene	ND	26000	ug/kg	SW846 8260B	

(Continued on next page)

SEVERN TRENT LABORATORIES, INC.

PRELIMINARY DATA SUMMARY

The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Conestoga Rovers & Assoc., Inc

Lot #: A4F170188 WOLVERINE GASKET **Date Reported:** 6/30/04

Project Number: 35298

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD	
Client Sample ID: S-35298-061604-BF-016					
Sample #: 016 Date Sampled: 06/16/04 16:21 Date Received: 06/17/04 Matrix: SOLID					
Volatile Organics by GC/MS					In Review
1,1,2,2-Tetrachloroethane	ND	53000	ug/kg	SW846 8260B	
Tetrachloroethene	ND	26000	ug/kg	SW846 8260B	
Toluene	**580000**	**53000**	**ug/kg**	**SW846 8260B**	
1,2,4-Trichloro-benzene	ND	130000	ug/kg	SW846 8260B	
1,1,1-Trichloroethane	ND	26000	ug/kg	SW846 8260B	
1,1,2-Trichloroethane	ND	26000	ug/kg	SW846 8260B	
Trichloroethene	ND	26000	ug/kg	SW846 8260B	
Trichlorofluoromethane	ND	53000	ug/kg	SW846 8260B	
1,1,2-Trichloro-1,2,2-trifluoroethane	ND	130000	ug/kg	SW846 8260B	
Vinyl chloride	ND	53000	ug/kg	SW846 8260B	
Xylenes (total)	ND	260000	ug/kg	SW846 8260B	
Results and reporting limits have been adjusted for dry weight.					
Inorganic Analysis					Reviewed
Total Residue as Percent Solids	**79.6**	**10.0**	**%**	**MCAWW 160.3 MOD**	
Client Sample ID: S-35298-061604-BF-017					
Sample #: 017 Date Sampled: 06/16/04 16:35 Date Received: 06/17/04 Matrix: SOLID					
Volatile Organics by GC/MS					In Review
1,2,4-Trimethylbenzene	ND	870000	ug/kg	SW846 8260B	
Acetone	ND	2600000	ug/kg	SW846 8260B	
Benzene	ND	170000	ug/kg	SW846 8260B	
Bromodichloromethane	ND	350000	ug/kg	SW846 8260B	
Bromoform	ND	350000	ug/kg	SW846 8260B	
Bromomethane	ND	870000	ug/kg	SW846 8260B	
2-Butanone	ND	2600000	ug/kg	SW846 8260B	
Carbon disulfide	ND	870000	ug/kg	SW846 8260B	
Carbon tetrachloride	ND	170000	ug/kg	SW846 8260B	
Chlorobenzene	**490000**	**170000**	**ug/kg**	**SW846 8260B**	
Chloroethane	ND	870000	ug/kg	SW846 8260B	
Chloroform	ND	170000	ug/kg	SW846 8260B	

(Continued on next page)

SEVERN TRENT LABORATORIES, INC.

PRELIMINARY DATA SUMMARY

The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Conestoga Rovers & Assoc., Inc

Lot #: A4F170188 WOLVERINE GASKET **Date Reported:** 6/30/04

Project Number: 35298

Client Sample ID: S-35298-061604-BF-017

Sample #: 017 Date Sampled: 06/16/04 16:35 Date Received: 06/17/04 Matrix: SOLID

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD	
Volatile Organics by GC/MS					In Review
Chloromethane	ND	870000	ug/kg	SW846 8260B	
Cyclohexane	ND	4200000	ug/kg	SW846 8260B	
Dibromochloromethane	ND	170000	ug/kg	SW846 8260B	
1,2-Dibromo-3-chloro-propane	ND	870000	ug/kg	SW846 8260B	
1,2-Dibromoethane	ND	870000	ug/kg	SW846 8260B	
1,2-Dichlorobenzene	ND	350000	ug/kg	SW846 8260B	
1,3-Dichlorobenzene	ND	350000	ug/kg	SW846 8260B	
1,4-Dichlorobenzene	ND	350000	ug/kg	SW846 8260B	
Dichlorodifluoromethane	ND	350000	ug/kg	SW846 8260B	
1,1-Dichloroethane	ND	170000	ug/kg	SW846 8260B	
1,2-Dichloroethane	ND	170000	ug/kg	SW846 8260B	
1,1-Dichloroethene	ND	170000	ug/kg	SW846 8260B	
cis-1,2-Dichloroethene	ND	170000	ug/kg	SW846 8260B	
trans-1,2-Dichloroethene	ND	170000	ug/kg	SW846 8260B	
1,2-Dichloropropane	ND	170000	ug/kg	SW846 8260B	
cis-1,3-Dichloropropene	ND	170000	ug/kg	SW846 8260B	
trans-1,3-Dichloropropene	ND	170000	ug/kg	SW846 8260B	
Ethylbenzene	ND	170000	ug/kg	SW846 8260B	
2-Hexanone	ND	8700000	ug/kg	SW846 8260B	
Isopropylbenzene	ND	870000	ug/kg	SW846 8260B	
Methyl acetate	ND	4200000	ug/kg	SW846 8260B	
Methylene chloride	ND	870000	ug/kg	SW846 8260B	
Methylcyclohexane	ND	4200000	ug/kg	SW846 8260B	
4-Methyl-2-pentanone	ND	8700000	ug/kg	SW846 8260B	
Methyl tert-butyl ether	ND	870000	ug/kg	SW846 8260B	
Styrene	ND	170000	ug/kg	SW846 8260B	
1,1,2,2-Tetrachloroethane	ND	350000	ug/kg	SW846 8260B	
Tetrachloroethene	ND	170000	ug/kg	SW846 8260B	
Toluene	**7100000**	**350000**	**ug/kg**	**SW846 8260B**	
1,2,4-Trichloro-benzene	ND	870000	ug/kg	SW846 8260B	
1,1,1-Trichloroethane	ND	170000	ug/kg	SW846 8260B	
1,1,2-Trichloroethane	ND	170000	ug/kg	SW846 8260B	
Trichloroethene	ND	170000	ug/kg	SW846 8260B	
Trichlorofluoromethane	ND	350000	ug/kg	SW846 8260B	
1,1,2-Trichloro-1,2,2-trifluoroethane	ND	870000	ug/kg	SW846 8260B	

(Continued on next page)

SEVERN TRENT LABORATORIES, INC.

PRELIMINARY DATA SUMMARY

The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Conestoga Rovers & Assoc., Inc
WOLVERINE GASKET
Project Number: 35298

Lot #: A4F170188 **Date Reported:** 6/30/04

Client Sample ID: S-35298-061604-BF-017
Sample #: 017 Date Sampled: 06/16/04 16:35 Date Received: 06/17/04 Matrix: SOLID

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD	
Volatile Organics by GC/MS					In Review
Vinyl chloride	ND	350000	ug/kg	SW846 8260B	
Xylenes (total)	ND	1700000	ug/kg	SW846 8260B	

Results and reporting limits have been adjusted for dry weight.

Inorganic Analysis					Reviewed
Total Residue as Percent Solids	**88.0**	**10.0**	**%**	**MCAWW 160.3 MOD**	

Client Sample ID: S-35298-061604-BF-018
Sample #: 018 Date Sampled: 06/16/04 16:40 Date Received: 06/17/04 Matrix: SOLID

Volatile Organics by GC/MS					In Review
1,2,4-Trimethylbenzene	ND	170000	ug/kg	SW846 8260B	
Acetone	ND	500000	ug/kg	SW846 8260B	
Benzene	ND	34000	ug/kg	SW846 8260B	
Bromodichloromethane	ND	67000	ug/kg	SW846 8260B	
Bromoform	ND	67000	ug/kg	SW846 8260B	
Bromomethane	ND	170000	ug/kg	SW846 8260B	
2-Butanone	ND	500000	ug/kg	SW846 8260B	
Carbon disulfide	ND	170000	ug/kg	SW846 8260B	
Carbon tetrachloride	ND	34000	ug/kg	SW846 8260B	
Chlorobenzene	**620000**	**34000**	**ug/kg**	**SW846 8260B**	
Chloroethane	ND	170000	ug/kg	SW846 8260B	
Chloroform	ND	34000	ug/kg	SW846 8260B	
Chloromethane	ND	170000	ug/kg	SW846 8260B	
Cyclohexane	ND	800000	ug/kg	SW846 8260B	
Dibromochloromethane	ND	34000	ug/kg	SW846 8260B	
1,2-Dibromo-3-chloro-propane	ND	170000	ug/kg	SW846 8260B	
1,2-Dibromoethane	ND	170000	ug/kg	SW846 8260B	
1,2-Dichlorobenzene	ND	67000	ug/kg	SW846 8260B	
1,3-Dichlorobenzene	ND	67000	ug/kg	SW846 8260B	
1,4-Dichlorobenzene	ND	67000	ug/kg	SW846 8260B	
Dichlorodifluoromethane	ND	67000	ug/kg	SW846 8260B	
1,1-Dichloroethane	ND	34000	ug/kg	SW846 8260B	

(Continued on next page)

SEVERN TRENT LABORATORIES, INC.

PRELIMINARY DATA SUMMARY

The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Conestoga Rovers & Assoc., Inc

Lot #: A4F170188 WOLVERINE GASKET **Date Reported:** 6/30/04

Project Number: 35298

Client Sample ID: S-35298-061604-BF-018

Sample #: 018 Date Sampled: 06/16/04 16:40 Date Received: 06/17/04 Matrix: SOLID

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD	
Volatile Organics by GC/MS					In Review
1,2-Dichloroethane	ND	34000	ug/kg	SW846 8260B	
1,1-Dichloroethene	ND	34000	ug/kg	SW846 8260B	
cis-1,2-Dichloroethene	ND	34000	ug/kg	SW846 8260B	
trans-1,2-Dichloroethene	ND	34000	ug/kg	SW846 8260B	
1,2-Dichloropropane	ND	34000	ug/kg	SW846 8260B	
cis-1,3-Dichloropropene	ND	34000	ug/kg	SW846 8260B	
trans-1,3-Dichloropropene	ND	34000	ug/kg	SW846 8260B	
Ethylbenzene	**50000**	**34000**	**ug/kg**	**SW846 8260B**	
2-Hexanone	ND	1700000	ug/kg	SW846 8260B	
Isopropylbenzene	ND	170000	ug/kg	SW846 8260B	
Methyl acetate	ND	800000	ug/kg	SW846 8260B	
Methylene chloride	ND	170000	ug/kg	SW846 8260B	
Methylcyclohexane	ND	800000	ug/kg	SW846 8260B	
4-Methyl-2-pentanone	ND	1700000	ug/kg	SW846 8260B	
Methyl tert-butyl ether	ND	170000	ug/kg	SW846 8260B	
Styrene	ND	34000	ug/kg	SW846 8260B	
1,1,2,2-Tetrachloroethane	ND	67000	ug/kg	SW846 8260B	
Tetrachloroethene	ND	34000	ug/kg	SW846 8260B	
Toluene	**840000**	**67000**	**ug/kg**	**SW846 8260B**	
1,2,4-Trichloro-benzene	ND	170000	ug/kg	SW846 8260B	
1,1,1-Trichloroethane	ND	34000	ug/kg	SW846 8260B	
1,1,2-Trichloroethane	ND	34000	ug/kg	SW846 8260B	
Trichloroethene	ND	34000	ug/kg	SW846 8260B	
Trichlorofluoromethane	ND	67000	ug/kg	SW846 8260B	
1,1,2-Trichloro-1,2,2-trifluoroethane	ND	170000	ug/kg	SW846 8260B	
Vinyl chloride	ND	67000	ug/kg	SW846 8260B	
Xylenes (total)	ND	340000	ug/kg	SW846 8260B	

Results and reporting limits have been adjusted for dry weight.

Inorganic Analysis					Reviewed
Total Residue as Percent Solids	**82.6**	**10.0**	**%**	**MCAWW 160.3 MOD**	

(Continued on next page)

SEVERN TRENT LABORATORIES, INC.

PRELIMINARY DATA SUMMARY

The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Conestoga Rovers & Assoc., Inc

Lot #: A4F170188

WOLVERINE GASKET

Project Number: 35298

Date Reported: 6/30/04

Client Sample ID: BLANK-35298-061604-BF-019

Sample #: 019 Date Sampled: 06/16/04 16:40 Date Received: 06/17/04 Matrix: WATER

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD	
Volatile Organics by GC/MS					In Review
1,2,4-Trimethylbenzene	ND	1.0	ug/L	SW846 8260B	
Acetone	ND	25	ug/L	SW846 8260B	
Benzene	ND	1.0	ug/L	SW846 8260B	
Bromodichloromethane	ND	1.0	ug/L	SW846 8260B	
Bromoform	ND	1.0	ug/L	SW846 8260B	
Bromomethane	ND	1.0	ug/L	SW846 8260B	
2-Butanone	ND	25	ug/L	SW846 8260B	
Carbon disulfide	ND	5.0	ug/L	SW846 8260B	
Carbon tetrachloride	ND	1.0	ug/L	SW846 8260B	
Chlorobenzene	ND	1.0	ug/L	SW846 8260B	
Chloroethane	ND	1.0	ug/L	SW846 8260B	
Chloroform	ND	1.0	ug/L	SW846 8260B	
Chloromethane	ND	1.0	ug/L	SW846 8260B	
Cyclohexane	ND	1.0	ug/L	SW846 8260B	
Dibromochloromethane	ND	1.0	ug/L	SW846 8260B	
1,2-Dibromo-3-chloro-propane	ND	1.0	ug/L	SW846 8260B	
1,2-Dibromoethane	ND	1.0	ug/L	SW846 8260B	
1,2-Dichlorobenzene	ND	1.0	ug/L	SW846 8260B	
1,3-Dichlorobenzene	ND	1.0	ug/L	SW846 8260B	
1,4-Dichlorobenzene	ND	1.0	ug/L	SW846 8260B	
Dichlorodifluoromethane	ND	1.0	ug/L	SW846 8260B	
1,1-Dichloroethane	ND	1.0	ug/L	SW846 8260B	
1,2-Dichloroethane	ND	1.0	ug/L	SW846 8260B	
1,1-Dichloroethene	ND	1.0	ug/L	SW846 8260B	
cis-1,2-Dichloroethene	ND	1.0	ug/L	SW846 8260B	
trans-1,2-Dichloroethene	ND	1.0	ug/L	SW846 8260B	
1,2-Dichloropropane	ND	1.0	ug/L	SW846 8260B	
cis-1,3-Dichloropropene	ND	1.0	ug/L	SW846 8260B	
trans-1,3-Dichloropropene	ND	1.0	ug/L	SW846 8260B	
Ethylbenzene	ND	1.0	ug/L	SW846 8260B	
2-Hexanone	ND	50	ug/L	SW846 8260B	
Isopropylbenzene	ND	5.0	ug/L	SW846 8260B	
Methyl acetate	ND	10	ug/L	SW846 8260B	
Methylene chloride	ND	5.0	ug/L	SW846 8260B	
Methylcyclohexane	ND	1.0	ug/L	SW846 8260B	
4-Methyl-2-pentanone	ND	50	ug/L	SW846 8260B	

(Continued on next page)

SEVERN TRENT LABORATORIES, INC.

PRELIMINARY DATA SUMMARY

The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Conestoga Rovers & Assoc., Inc

Lot #: A4F170188 WOLVERINE GASKET **Date Reported:** 6/30/04

Project Number: 35298

Client Sample ID: BLANK-35298-061604-BF-019

Sample #: 019 Date Sampled: 06/16/04 16:40 Date Received: 06/17/04 Matrix: WATER

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD	
Volatile Organics by GC/MS					In Review
Methyl tert-butyl ether	ND	5.0	ug/L	SW846 8260B	
Styrene	ND	1.0	ug/L	SW846 8260B	
1,1,2,2-Tetrachloroethane	ND	1.0	ug/L	SW846 8260B	
Tetrachloroethene	ND	1.0	ug/L	SW846 8260B	
Toluene	**1.7**	**1.0**	**ug/L**	**SW846 8260B**	
1,2,4-Trichloro-benzene	ND	5.0	ug/L	SW846 8260B	
1,1,1-Trichloroethane	ND	1.0	ug/L	SW846 8260B	
1,1,2-Trichloroethane	ND	1.0	ug/L	SW846 8260B	
Trichloroethene	ND	1.0	ug/L	SW846 8260B	
Trichlorofluoromethane	ND	1.0	ug/L	SW846 8260B	
1,1,2-Trichloro-1,2,2-trifluoroethane	ND	1.0	ug/L	SW846 8260B	
Vinyl chloride	ND	1.0	ug/L	SW846 8260B	
Xylenes (total)	ND	2.0	ug/L	SW846 8260B	

SEVERN TRENT LABORATORIES, INC.

PRELIMINARY DATA SUMMARY

The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Conestoga Rovers & Assoc., Inc

Lot #: A4F180175 WOLVERINE GASKET **Date Reported:** 7/07/04

Project Number: 35298

Client Sample ID: GW-35298-061704-BF-020

Sample #: 001 Date Sampled: 06/17/04 11:05 Date Received: 06/18/04 Matrix: WATER

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD	
Volatile Organics by GC/MS					Reviewed
1,2,4-Trimethylbenzene	ND	1.4	ug/L	SW846 8260B	
Acetone	ND	36	ug/L	SW846 8260B	
Benzene	ND	1.4	ug/L	SW846 8260B	
Bromodichloromethane	ND	1.4	ug/L	SW846 8260B	
Bromoform	ND	1.4	ug/L	SW846 8260B	
Bromomethane	ND	1.4	ug/L	SW846 8260B	
2-Butanone	ND	36	ug/L	SW846 8260B	
Carbon disulfide	ND	7.2	ug/L	SW846 8260B	
Carbon tetrachloride	ND	1.4	ug/L	SW846 8260B	
Chlorobenzene	**42**	**1.4**	**ug/L**	**SW846 8260B**	
Chloroethane	ND	1.4	ug/L	SW846 8260B	
Chloroform	ND	1.4	ug/L	SW846 8260B	
Chloromethane	ND	1.4	ug/L	SW846 8260B	
Cyclohexane	ND	1.4	ug/L	SW846 8260B	
Dibromochloromethane	ND	1.4	ug/L	SW846 8260B	
1,2-Dibromo-3-chloro-propane	ND	1.4	ug/L	SW846 8260B	
1,2-Dibromoethane	ND	1.4	ug/L	SW846 8260B	
1,2-Dichlorobenzene	ND	1.4	ug/L	SW846 8260B	
1,3-Dichlorobenzene	ND	1.4	ug/L	SW846 8260B	
1,4-Dichlorobenzene	ND	1.4	ug/L	SW846 8260B	
Dichlorodifluoromethane	ND	1.4	ug/L	SW846 8260B	
1,1-Dichloroethane	ND	1.4	ug/L	SW846 8260B	
1,2-Dichloroethane	ND	1.4	ug/L	SW846 8260B	
1,1-Dichloroethene	ND	1.4	ug/L	SW846 8260B	
cis-1,2-Dichloroethene	ND	1.4	ug/L	SW846 8260B	
trans-1,2-Dichloroethene	ND	1.4	ug/L	SW846 8260B	
1,2-Dichloropropane	ND	1.4	ug/L	SW846 8260B	
cis-1,3-Dichloropropene	ND	1.4	ug/L	SW846 8260B	
trans-1,3-Dichloropropene	ND	1.4	ug/L	SW846 8260B	
Ethylbenzene	ND	1.4	ug/L	SW846 8260B	
2-Hexanone	ND	72	ug/L	SW846 8260B	
Isopropylbenzene	ND	7.2	ug/L	SW846 8260B	
Methyl acetate	ND	14	ug/L	SW846 8260B	
Methylene chloride	ND	7.2	ug/L	SW846 8260B	
Methylcyclohexane	ND	1.4	ug/L	SW846 8260B	
4-Methyl-2-pentanone	ND	72	ug/L	SW846 8260B	

(Continued on next page)

SEVERN TRENT LABORATORIES, INC.

PRELIMINARY DATA SUMMARY

The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Conestoga Rovers & Assoc., Inc

Lot #: A4F180175 WOLVERINE GASKET **Date Reported:** 7/07/04

Project Number: 35298

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD	
Client Sample ID: GW-35298-061704-BF-020					
Sample #: 001 Date Sampled: 06/17/04 11:05 Date Received: 06/18/04 Matrix: WATER					
Volatile Organics by GC/MS					Reviewed
Methyl tert-butyl ether	ND	7.2	ug/L	SW846 8260B	
Styrene	ND	1.4	ug/L	SW846 8260B	
1,1,2,2-Tetrachloroethane	ND	1.4	ug/L	SW846 8260B	
Tetrachloroethene	ND	1.4	ug/L	SW846 8260B	
Toluene	ND	1.4	ug/L	SW846 8260B	
1,2,4-Trichloro-benzene	ND	7.2	ug/L	SW846 8260B	
1,1,1-Trichloroethane	ND	1.4	ug/L	SW846 8260B	
1,1,2-Trichloroethane	ND	1.4	ug/L	SW846 8260B	
Trichloroethene	ND	1.4	ug/L	SW846 8260B	
Trichlorofluoromethane	ND	1.4	ug/L	SW846 8260B	
1,1,2-Trichloro-1,2,2-trifluoroethane	ND	1.4	ug/L	SW846 8260B	
Vinyl chloride	ND	1.4	ug/L	SW846 8260B	
Xylenes (total)	ND	2.9	ug/L	SW846 8260B	
Client Sample ID: GW-35298-061704-BF-021					
Sample #: 002 Date Sampled: 06/17/04 11:25 Date Received: 06/18/04 Matrix: WATER					
Volatile Organics by GC/MS					Reviewed
1,2,4-Trimethylbenzene	ND	1.0	ug/L	SW846 8260B	
Acetone	ND	25	ug/L	SW846 8260B	
Benzene	ND	1.0	ug/L	SW846 8260B	
Bromodichloromethane	ND	1.0	ug/L	SW846 8260B	
Bromoform	ND	1.0	ug/L	SW846 8260B	
Bromomethane	ND	1.0	ug/L	SW846 8260B	
2-Butanone	ND	25	ug/L	SW846 8260B	
Carbon disulfide	ND	5.0	ug/L	SW846 8260B	
Carbon tetrachloride	ND	1.0	ug/L	SW846 8260B	
Chlorobenzene	**5.5**	**1.0**	**ug/L**	**SW846 8260B**	
Chloroethane	ND	1.0	ug/L	SW846 8260B	
Chloroform	ND	1.0	ug/L	SW846 8260B	
Chloromethane	ND	1.0	ug/L	SW846 8260B	
Cyclohexane	ND	1.0	ug/L	SW846 8260B	
Dibromochloromethane	ND	1.0	ug/L	SW846 8260B	
1,2-Dibromo-3-chloro-propane	ND	1.0	ug/L	SW846 8260B	

(Continued on next page)

SEVERN TRENT LABORATORIES, INC.

PRELIMINARY DATA SUMMARY

The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Conestoga Rovers & Assoc., Inc

Lot #: A4F180175 WOLVERINE GASKET **Date Reported:** 7/07/04

Project Number: 35298

Client Sample ID: GW-35298-061704-BF-021

Sample #: 002 Date Sampled: 06/17/04 11:25 Date Received: 06/18/04 Matrix: WATER

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD
Volatile Organics by GC/MS				Reviewed
1,2-Dibromoethane	ND	1.0	ug/L	SW846 8260B
1,2-Dichlorobenzene	ND	1.0	ug/L	SW846 8260B
1,3-Dichlorobenzene	ND	1.0	ug/L	SW846 8260B
1,4-Dichlorobenzene	ND	1.0	ug/L	SW846 8260B
Dichlorodifluoromethane	ND	1.0	ug/L	SW846 8260B
1,1-Dichloroethane	ND	1.0	ug/L	SW846 8260B
1,2-Dichloroethane	ND	1.0	ug/L	SW846 8260B
1,1-Dichloroethene	ND	1.0	ug/L	SW846 8260B
cis-1,2-Dichloroethene	ND	1.0	ug/L	SW846 8260B
trans-1,2-Dichloroethene	ND	1.0	ug/L	SW846 8260B
1,2-Dichloropropane	ND	1.0	ug/L	SW846 8260B
cis-1,3-Dichloropropene	ND	1.0	ug/L	SW846 8260B
trans-1,3-Dichloropropene	ND	1.0	ug/L	SW846 8260B
Ethylbenzene	ND	1.0	ug/L	SW846 8260B
2-Hexanone	ND	50	ug/L	SW846 8260B
Isopropylbenzene	ND	5.0	ug/L	SW846 8260B
Methyl acetate	ND	10	ug/L	SW846 8260B
Methylene chloride	ND	5.0	ug/L	SW846 8260B
Methylcyclohexane	ND	1.0	ug/L	SW846 8260B
4-Methyl-2-pentanone	ND	50	ug/L	SW846 8260B
Methyl tert-butyl ether	ND	5.0	ug/L	SW846 8260B
Styrene	ND	1.0	ug/L	SW846 8260B
1,1,2,2-Tetrachloroethane	ND	1.0	ug/L	SW846 8260B
Tetrachloroethene	ND	1.0	ug/L	SW846 8260B
Toluene	ND	1.0	ug/L	SW846 8260B
1,2,4-Trichloro-benzene	ND	5.0	ug/L	SW846 8260B
1,1,1-Trichloroethane	ND	1.0	ug/L	SW846 8260B
1,1,2-Trichloroethane	ND	1.0	ug/L	SW846 8260B
Trichloroethene	ND	1.0	ug/L	SW846 8260B
Trichlorofluoromethane	ND	1.0	ug/L	SW846 8260B
1,1,2-Trichloro-1,2,2-trifluoroethane	ND	1.0	ug/L	SW846 8260B
Vinyl chloride	ND	1.0	ug/L	SW846 8260B
Xylenes (total)	ND	2.0	ug/L	SW846 8260B

(Continued on next page)

SEVERN TRENT LABORATORIES, INC.

PRELIMINARY DATA SUMMARY

The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Conestoga Rovers & Assoc., Inc

Lot #: A4F180175 WOLVERINE GASKET **Date Reported:** 7/07/04

Project Number: 35298

Client Sample ID: GW-35298-061704-BF-022

Sample #: 003 Date Sampled: 06/17/04 11:50 Date Received: 06/18/04 Matrix: WATER

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD	
Volatile Organics by GC/MS					Reviewed
1,2,4-Trimethylbenzene	ND	1.0	ug/L	SW846 8260B	
Acetone	ND	25	ug/L	SW846 8260B	
Benzene	ND	1.0	ug/L	SW846 8260B	
Bromodichloromethane	ND	1.0	ug/L	SW846 8260B	
Bromoform	ND	1.0	ug/L	SW846 8260B	
Bromomethane	ND	1.0	ug/L	SW846 8260B	
2-Butanone	ND	25	ug/L	SW846 8260B	
Carbon disulfide	ND	5.0	ug/L	SW846 8260B	
Carbon tetrachloride	ND	1.0	ug/L	SW846 8260B	
Chlorobenzene	ND	1.0	ug/L	SW846 8260B	
Chloroethane	ND	1.0	ug/L	SW846 8260B	
Chloroform	ND	1.0	ug/L	SW846 8260B	
Chloromethane	ND	1.0	ug/L	SW846 8260B	
Cyclohexane	ND	1.0	ug/L	SW846 8260B	
Dibromochloromethane	ND	1.0	ug/L	SW846 8260B	
1,2-Dibromo-3-chloro-propane	ND	1.0	ug/L	SW846 8260B	
1,2-Dibromoethane	ND	1.0	ug/L	SW846 8260B	
1,2-Dichlorobenzene	ND	1.0	ug/L	SW846 8260B	
1,3-Dichlorobenzene	ND	1.0	ug/L	SW846 8260B	
1,4-Dichlorobenzene	ND	1.0	ug/L	SW846 8260B	
Dichlorodifluoromethane	ND	1.0	ug/L	SW846 8260B	
1,1-Dichloroethane	ND	1.0	ug/L	SW846 8260B	
1,2-Dichloroethane	ND	1.0	ug/L	SW846 8260B	
1,1-Dichloroethene	ND	1.0	ug/L	SW846 8260B	
cis-1,2-Dichloroethene	ND	1.0	ug/L	SW846 8260B	
trans-1,2-Dichloroethene	ND	1.0	ug/L	SW846 8260B	
1,2-Dichloropropane	ND	1.0	ug/L	SW846 8260B	
cis-1,3-Dichloropropene	ND	1.0	ug/L	SW846 8260B	
trans-1,3-Dichloropropene	ND	1.0	ug/L	SW846 8260B	
Ethylbenzene	ND	1.0	ug/L	SW846 8260B	
2-Hexanone	ND	50	ug/L	SW846 8260B	
Isopropylbenzene	ND	5.0	ug/L	SW846 8260B	
Methyl acetate	ND	10	ug/L	SW846 8260B	
Methylene chloride	ND	5.0	ug/L	SW846 8260B	
Methylcyclohexane	ND	1.0	ug/L	SW846 8260B	
4-Methyl-2-pentanone	ND	50	ug/L	SW846 8260B	

(Continued on next page)

SEVERN TRENT LABORATORIES, INC.

PRELIMINARY DATA SUMMARY

The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Conestoga Rovers & Assoc., Inc

Lot #: A4F180175 WOLVERINE GASKET **Date Reported:** 7/07/04

Project Number: 35298

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD	
Client Sample ID: GW-35298-061704-BF-022					
Sample #: 003 Date Sampled: 06/17/04 11:50 Date Received: 06/18/04 Matrix: WATER					
Volatile Organics by GC/MS					Reviewed
Methyl tert-butyl ether	ND	5.0	ug/L	SW846 8260B	
Styrene	ND	1.0	ug/L	SW846 8260B	
1,1,2,2-Tetrachloroethane	ND	1.0	ug/L	SW846 8260B	
Tetrachloroethene	ND	1.0	ug/L	SW846 8260B	
Toluene	ND	1.0	ug/L	SW846 8260B	
1,2,4-Trichloro-benzene	ND	5.0	ug/L	SW846 8260B	
1,1,1-Trichloroethane	ND	1.0	ug/L	SW846 8260B	
1,1,2-Trichloroethane	ND	1.0	ug/L	SW846 8260B	
Trichloroethene	ND	1.0	ug/L	SW846 8260B	
Trichlorofluoromethane	ND	1.0	ug/L	SW846 8260B	
1,1,2-Trichloro-1,2,2-trifluoroethane	ND	1.0	ug/L	SW846 8260B	
Vinyl chloride	ND	1.0	ug/L	SW846 8260B	
Xylenes (total)	ND	2.0	ug/L	SW846 8260B	
Client Sample ID: GW-35298-061704-BF-023					
Sample #: 004 Date Sampled: 06/17/04 12:25 Date Received: 06/18/04 Matrix: WATER					
Volatile Organics by GC/MS					Reviewed
1,2,4-Trimethylbenzene	ND	1.0	ug/L	SW846 8260B	
Acetone	ND	25	ug/L	SW846 8260B	
Benzene	ND	1.0	ug/L	SW846 8260B	
Bromodichloromethane	ND	1.0	ug/L	SW846 8260B	
Bromoform	ND	1.0	ug/L	SW846 8260B	
Bromomethane	ND	1.0	ug/L	SW846 8260B	
2-Butanone	ND	25	ug/L	SW846 8260B	
Carbon disulfide	ND	5.0	ug/L	SW846 8260B	
Carbon tetrachloride	ND	1.0	ug/L	SW846 8260B	
Chlorobenzene	**6.1**	**1.0**	**ug/L**	**SW846 8260B**	
Chloroethane	ND	1.0	ug/L	SW846 8260B	
Chloroform	ND	1.0	ug/L	SW846 8260B	
Chloromethane	ND	1.0	ug/L	SW846 8260B	
Cyclohexane	ND	1.0	ug/L	SW846 8260B	
Dibromochloromethane	ND	1.0	ug/L	SW846 8260B	
1,2-Dibromo-3-chloro-propane	ND	1.0	ug/L	SW846 8260B	

(Continued on next page)

SEVERN TRENT LABORATORIES, INC.

PRELIMINARY DATA SUMMARY

The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Conestoga Rovers & Assoc., Inc

Lot #: A4F180175 WOLVERINE GASKET **Date Reported:** 7/07/04

Project Number: 35298

Client Sample ID: GW-35298-061704-BF-023

Sample #: 004 Date Sampled: 06/17/04 12:25 Date Received: 06/18/04 Matrix: WATER

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD	
Volatile Organics by GC/MS					Reviewed
1,2-Dibromoethane	ND	1.0	ug/L	SW846 8260B	
1,2-Dichlorobenzene	ND	1.0	ug/L	SW846 8260B	
1,3-Dichlorobenzene	ND	1.0	ug/L	SW846 8260B	
1,4-Dichlorobenzene	ND	1.0	ug/L	SW846 8260B	
Dichlorodifluoromethane	ND	1.0	ug/L	SW846 8260B	
1,1-Dichloroethane	ND	1.0	ug/L	SW846 8260B	
1,2-Dichloroethane	ND	1.0	ug/L	SW846 8260B	
1,1-Dichloroethene	ND	1.0	ug/L	SW846 8260B	
cis-1,2-Dichloroethene	ND	1.0	ug/L	SW846 8260B	
trans-1,2-Dichloroethene	ND	1.0	ug/L	SW846 8260B	
1,2-Dichloropropane	ND	1.0	ug/L	SW846 8260B	
cis-1,3-Dichloropropene	ND	1.0	ug/L	SW846 8260B	
trans-1,3-Dichloropropene	ND	1.0	ug/L	SW846 8260B	
Ethylbenzene	ND	1.0	ug/L	SW846 8260B	
2-Hexanone	ND	50	ug/L	SW846 8260B	
Isopropylbenzene	ND	5.0	ug/L	SW846 8260B	
Methyl acetate	ND	10	ug/L	SW846 8260B	
Methylene chloride	ND	5.0	ug/L	SW846 8260B	
Methylcyclohexane	ND	1.0	ug/L	SW846 8260B	
4-Methyl-2-pentanone	ND	50	ug/L	SW846 8260B	
Methyl tert-butyl ether	ND	5.0	ug/L	SW846 8260B	
Styrene	ND	1.0	ug/L	SW846 8260B	
1,1,2,2-Tetrachloroethane	ND	1.0	ug/L	SW846 8260B	
Tetrachloroethene	ND	1.0	ug/L	SW846 8260B	
Toluene	ND	1.0	ug/L	SW846 8260B	
1,2,4-Trichlorobenzene	ND	5.0	ug/L	SW846 8260B	
1,1,1-Trichloroethane	ND	1.0	ug/L	SW846 8260B	
1,1,2-Trichloroethane	ND	1.0	ug/L	SW846 8260B	
Trichloroethene	ND	1.0	ug/L	SW846 8260B	
Trichlorofluoromethane	ND	1.0	ug/L	SW846 8260B	
1,1,2-Trichloro-1,2,2-trifluoroethane	ND	1.0	ug/L	SW846 8260B	
Vinyl chloride	ND	1.0	ug/L	SW846 8260B	
Xylenes (total)	ND	2.0	ug/L	SW846 8260B	

(Continued on next page)

SEVERN TRENT LABORATORIES, INC.

PRELIMINARY DATA SUMMARY

The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Conestoga Rovers & Assoc., Inc

Lot #: A4F180175 WOLVERINE GASKET **Date Reported:** 7/07/04

Project Number: 35298

Client Sample ID: GW-35298-061704-BF-024

Sample #: 005 Date Sampled: 06/17/04 16:00 Date Received: 06/18/04 Matrix: WATER

PARAMETER		RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD	
Trace Inductively Coupled Plasma (ICP) Metals						Reviewed
Iron		**2.2**	**0.10**	**mg/L**	**SW846 6010B**	
Manganese		**3.2**	**0.015**	**mg/L**	**SW846 6010B**	
Iron	**Dissolved**	**2.2**	**0.10**	**mg/L**	**SW846 6010B**	
Manganese	**Dissolved**	**3.5**	**0.015**	**mg/L**	**SW846 6010B**	
Volatile Organics by GC/MS						Reviewed
1,2,4-Trimethylbenzene		ND	1200	ug/L	SW846 8260B	
Acetone		ND	31000	ug/L	SW846 8260B	
Benzene		**44000**	**1200**	**ug/L**	**SW846 8260B**	
Bromodichloromethane		ND	1200	ug/L	SW846 8260B	
Bromoform		ND	1200	ug/L	SW846 8260B	
Bromomethane		ND	1200	ug/L	SW846 8260B	
2-Butanone		ND	31000	ug/L	SW846 8260B	
Carbon disulfide		ND	6200	ug/L	SW846 8260B	
Carbon tetrachloride		ND	1200	ug/L	SW846 8260B	
Chlorobenzene		**8600**	**1200**	**ug/L**	**SW846 8260B**	
Chloroethane		ND	1200	ug/L	SW846 8260B	
Chloroform		ND	1200	ug/L	SW846 8260B	
Chloromethane		ND	1200	ug/L	SW846 8260B	
Cyclohexane		ND	1200	ug/L	SW846 8260B	
Dibromochloromethane		ND	1200	ug/L	SW846 8260B	
1,2-Dibromo-3-chloro-propane		ND	1200	ug/L	SW846 8260B	
1,2-Dibromoethane		ND	1200	ug/L	SW846 8260B	
1,2-Dichlorobenzene		ND	1200	ug/L	SW846 8260B	
1,3-Dichlorobenzene		ND	1200	ug/L	SW846 8260B	
1,4-Dichlorobenzene		ND	1200	ug/L	SW846 8260B	
Dichlorodifluoromethane		ND	1200	ug/L	SW846 8260B	
1,1-Dichloroethane		ND	1200	ug/L	SW846 8260B	
1,2-Dichloroethane		ND	1200	ug/L	SW846 8260B	
1,1-Dichloroethene		ND	1200	ug/L	SW846 8260B	
cis-1,2-Dichloroethene		ND	1200	ug/L	SW846 8260B	
trans-1,2-Dichloroethene		ND	1200	ug/L	SW846 8260B	
1,2-Dichloropropane		ND	1200	ug/L	SW846 8260B	
cis-1,3-Dichloropropene		ND	1200	ug/L	SW846 8260B	
trans-1,3-Dichloropropene		ND	1200	ug/L	SW846 8260B	

(Continued on next page)

SEVERN TRENT LABORATORIES, INC.

PRELIMINARY DATA SUMMARY

The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Conestoga Rovers & Assoc., Inc

Lot #: A4F180175 WOLVERINE GASKET **Date Reported:** 7/07/04

Project Number: 35298

Client Sample ID: GW-35298-061704-BF-024

Sample #: 005 Date Sampled: 06/17/04 16:00 Date Received: 06/18/04 Matrix: WATER

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD
Volatile Organics by GC/MS				Reviewed
Ethylbenzene	ND	1200	ug/L	SW846 8260B
2-Hexanone	ND	62000	ug/L	SW846 8260B
Isopropylbenzene	ND	6200	ug/L	SW846 8260B
Methyl acetate	ND	12000	ug/L	SW846 8260B
Methylene chloride	ND	6200	ug/L	SW846 8260B
Methylcyclohexane	ND	1200	ug/L	SW846 8260B
4-Methyl-2-pentanone	ND	62000	ug/L	SW846 8260B
Methyl tert-butyl ether	ND	6200	ug/L	SW846 8260B
Styrene	ND	1200	ug/L	SW846 8260B
1,1,2,2-Tetrachloroethane	ND	1200	ug/L	SW846 8260B
Tetrachloroethene	ND	1200	ug/L	SW846 8260B
Toluene	ND	1200	ug/L	SW846 8260B
1,2,4-Trichloro-benzene	ND	6200	ug/L	SW846 8260B
1,1,1-Trichloroethane	ND	1200	ug/L	SW846 8260B
1,1,2-Trichloroethane	ND	1200	ug/L	SW846 8260B
Trichloroethene	ND	1200	ug/L	SW846 8260B
Trichlorofluoromethane	ND	1200	ug/L	SW846 8260B
1,1,2-Trichloro-1,2,2-trifluoroethane	ND	1200	ug/L	SW846 8260B
Vinyl chloride	ND	1200	ug/L	SW846 8260B
Xylenes (total)	ND	2500	ug/L	SW846 8260B
Inorganic Analysis				Reviewed
Nitrite as N	ND	0.10	mg/L	MCAWW 300.0A
Nitrate as N	ND	0.10	mg/L	MCAWW 300.0A
Phosphate as P, Ortho	ND	0.50	mg/L	MCAWW 300.0A
Sulfate	ND	1.0	mg/L	MCAWW 300.0A
Ammonia Nitrogen	**0.2**	**0.2**	**mg/L**	**MCAWW 350.3**
Sulfide	ND	1.0	mg/L	MCAWW 376.1
Total Organic Carbon	**13**	**1**	**mg/L**	**MCAWW 415.1**

(Continued on next page)

SEVERN TRENT LABORATORIES, INC.

PRELIMINARY DATA SUMMARY

The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Conestoga Rovers & Assoc., Inc
WOLVERINE GASKET
Project Number: 35298

Lot #: A4F180175 **Date Reported:** 7/07/04

Client Sample ID: GW-35298-061704-BF-025
Sample #: 006 Date Sampled: 06/17/04 16:07 Date Received: 06/18/04 Matrix: WATER

PARAMETER		RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD	
Trace Inductively Coupled Plasma (ICP) Metals						Reviewed
Iron		**3.3**	**0.10**	**mg/L**	**SW846 6010B**	
Manganese		**1.3**	**0.015**	**mg/L**	**SW846 6010B**	
Iron	**Dissolved**	**2.2**	**0.10**	**mg/L**	**SW846 6010B**	
Manganese	**Dissolved**	**1.2**	**0.015**	**mg/L**	**SW846 6010B**	
Volatile Organics by GC/MS						Reviewed
1,2,4-Trimethylbenzene		ND	420	ug/L	SW846 8260B	
Acetone		ND	10000	ug/L	SW846 8260B	
Benzene		**8700**	**420**	**ug/L**	**SW846 8260B**	
Bromodichloromethane		ND	420	ug/L	SW846 8260B	
Bromoform		ND	420	ug/L	SW846 8260B	
Bromomethane		ND	420	ug/L	SW846 8260B	
2-Butanone		ND	10000	ug/L	SW846 8260B	
Carbon disulfide		ND	2100	ug/L	SW846 8260B	
Carbon tetrachloride		ND	420	ug/L	SW846 8260B	
Chlorobenzene		**14000**	**420**	**ug/L**	**SW846 8260B**	
Chloroethane		ND	420	ug/L	SW846 8260B	
Chloroform		ND	420	ug/L	SW846 8260B	
Chloromethane		ND	420	ug/L	SW846 8260B	
Cyclohexane		ND	420	ug/L	SW846 8260B	
Dibromochloromethane		ND	420	ug/L	SW846 8260B	
1,2-Dibromo-3-chloro-propane		ND	420	ug/L	SW846 8260B	
1,2-Dibromoethane		ND	420	ug/L	SW846 8260B	
1,2-Dichlorobenzene		ND	420	ug/L	SW846 8260B	
1,3-Dichlorobenzene		ND	420	ug/L	SW846 8260B	
1,4-Dichlorobenzene		ND	420	ug/L	SW846 8260B	
Dichlorodifluoromethane		ND	420	ug/L	SW846 8260B	
1,1-Dichloroethane		ND	420	ug/L	SW846 8260B	
1,2-Dichloroethane		ND	420	ug/L	SW846 8260B	
1,1-Dichloroethene		ND	420	ug/L	SW846 8260B	
cis-1,2-Dichloroethene		ND	420	ug/L	SW846 8260B	
trans-1,2-Dichloroethene		ND	420	ug/L	SW846 8260B	
1,2-Dichloropropane		ND	420	ug/L	SW846 8260B	
cis-1,3-Dichloropropene		ND	420	ug/L	SW846 8260B	
trans-1,3-Dichloropropene		ND	420	ug/L	SW846 8260B	

(Continued on next page)

SEVERN TRENT LABORATORIES, INC.

PRELIMINARY DATA SUMMARY

The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Conestoga Rovers & Assoc., Inc

Lot #: A4F180175

WOLVERINE GASKET

Date Reported: 7/07/04

Project Number: 35298

Client Sample ID: GW-35298-061704-BF-025

Sample #: 006 Date Sampled: 06/17/04 16:07 Date Received: 06/18/04 Matrix: WATER

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD	
Volatile Organics by GC/MS					Reviewed
Ethylbenzene	**620**	**420**	**ug/L**	**SW846 8260B**	
2-Hexanone	ND	21000	ug/L	SW846 8260B	
Isopropylbenzene	ND	2100	ug/L	SW846 8260B	
Methyl acetate	ND	4200	ug/L	SW846 8260B	
Methylene chloride	ND	2100	ug/L	SW846 8260B	
Methylcyclohexane	ND	420	ug/L	SW846 8260B	
4-Methyl-2-pentanone	ND	21000	ug/L	SW846 8260B	
Methyl tert-butyl ether	ND	2100	ug/L	SW846 8260B	
Styrene	ND	420	ug/L	SW846 8260B	
1,1,2,2-Tetrachloroethane	ND	420	ug/L	SW846 8260B	
Tetrachloroethene	ND	420	ug/L	SW846 8260B	
Toluene	ND	420	ug/L	SW846 8260B	
1,2,4-Trichloro-benzene	ND	2100	ug/L	SW846 8260B	
1,1,1-Trichloroethane	ND	420	ug/L	SW846 8260B	
1,1,2-Trichloroethane	ND	420	ug/L	SW846 8260B	
Trichloroethene	ND	420	ug/L	SW846 8260B	
Trichlorofluoromethane	ND	420	ug/L	SW846 8260B	
1,1,2-Trichloro-1,2,2-trifluoroethane	ND	420	ug/L	SW846 8260B	
Vinyl chloride	ND	420	ug/L	SW846 8260B	
Xylenes (total)	**1400**	**830**	**ug/L**	**SW846 8260B**	
Inorganic Analysis					Reviewed
Nitrite as N	ND	0.10	mg/L	MCAWW 300.0A	
Nitrate as N	ND	0.10	mg/L	MCAWW 300.0A	
Phosphate as P, Ortho	ND	0.50	mg/L	MCAWW 300.0A	
Sulfate	**45.3**	**1.0**	**mg/L**	**MCAWW 300.0A**	
Ammonia Nitrogen	ND	0.2	mg/L	MCAWW 350.3	
Sulfide	ND	1.0	mg/L	MCAWW 376.1	
Total Organic Carbon	**10**	**1**	**mg/L**	**MCAWW 415.1**	

(Continued on next page)

SEVERN TRENT LABORATORIES, INC.

PRELIMINARY DATA SUMMARY

The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Lot #: A4F180175

Conestoga Rovers & Assoc., Inc
WOLVERINE GASKET
Project Number: 35298

Date Reported: 7/07/04

Client Sample ID: TRIP BLANK-35298-061704-BF-026
Sample #: 007 Date Sampled: 06/17/04 16:07 Date Received: 06/18/04 Matrix: WATER

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD	
Volatile Organics by GC/MS					Reviewed
1,2,4-Trimethylbenzene	ND	1.0	ug/L	SW846 8260B	
Acetone	ND	25	ug/L	SW846 8260B	
Benzene	ND	1.0	ug/L	SW846 8260B	
Bromodichloromethane	ND	1.0	ug/L	SW846 8260B	
Bromoform	ND	1.0	ug/L	SW846 8260B	
Bromomethane	ND	1.0	ug/L	SW846 8260B	
2-Butanone	ND	25	ug/L	SW846 8260B	
Carbon disulfide	ND	5.0	ug/L	SW846 8260B	
Carbon tetrachloride	ND	1.0	ug/L	SW846 8260B	
Chlorobenzene	ND	1.0	ug/L	SW846 8260B	
Chloroethane	ND	1.0	ug/L	SW846 8260B	
Chloroform	ND	1.0	ug/L	SW846 8260B	
Chloromethane	ND	1.0	ug/L	SW846 8260B	
Cyclohexane	ND	1.0	ug/L	SW846 8260B	
Dibromochloromethane	ND	1.0	ug/L	SW846 8260B	
1,2-Dibromo-3-chloro-propane	ND	1.0	ug/L	SW846 8260B	
1,2-Dibromoethane	ND	1.0	ug/L	SW846 8260B	
1,2-Dichlorobenzene	ND	1.0	ug/L	SW846 8260B	
1,3-Dichlorobenzene	ND	1.0	ug/L	SW846 8260B	
1,4-Dichlorobenzene	ND	1.0	ug/L	SW846 8260B	
Dichlorodifluoromethane	ND	1.0	ug/L	SW846 8260B	
1,1-Dichloroethane	ND	1.0	ug/L	SW846 8260B	
1,2-Dichloroethane	ND	1.0	ug/L	SW846 8260B	
1,1-Dichloroethene	ND	1.0	ug/L	SW846 8260B	
cis-1,2-Dichloroethene	ND	1.0	ug/L	SW846 8260B	
trans-1,2-Dichloroethene	ND	1.0	ug/L	SW846 8260B	
1,2-Dichloropropane	ND	1.0	ug/L	SW846 8260B	
cis-1,3-Dichloropropene	ND	1.0	ug/L	SW846 8260B	
trans-1,3-Dichloropropene	ND	1.0	ug/L	SW846 8260B	
Ethylbenzene	ND	1.0	ug/L	SW846 8260B	
2-Hexanone	ND	50	ug/L	SW846 8260B	
Isopropylbenzene	ND	5.0	ug/L	SW846 8260B	
Methyl acetate	ND	10	ug/L	SW846 8260B	
Methylene chloride	ND	5.0	ug/L	SW846 8260B	
Methylcyclohexane	ND	1.0	ug/L	SW846 8260B	
4-Methyl-2-pentanone	ND	50	ug/L	SW846 8260B	

(Continued on next page)

SEVERN TRENT LABORATORIES, INC.

PRELIMINARY DATA SUMMARY

The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Lot #: A4F180175

Conestoga Rovers & Assoc., Inc
WOLVERINE GASKET
Project Number: 35298

Date Reported: 7/07/04

Client Sample ID: TRIP BLANK-35298-061704-BF-026
Sample #: 007 Date Sampled: 06/17/04 16:07 Date Received: 06/18/04 Matrix: WATER

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD	
Volatile Organics by GC/MS					Reviewed
Methyl tert-butyl ether	ND	5.0	ug/L	SW846 8260B	
Styrene	ND	1.0	ug/L	SW846 8260B	
1,1,2,2-Tetrachloroethane	ND	1.0	ug/L	SW846 8260B	
Tetrachloroethene	ND	1.0	ug/L	SW846 8260B	
Toluene	ND	1.0	ug/L	SW846 8260B	
1,2,4-Trichloro-benzene	ND	5.0	ug/L	SW846 8260B	
1,1,1-Trichloroethane	ND	1.0	ug/L	SW846 8260B	
1,1,2-Trichloroethane	ND	1.0	ug/L	SW846 8260B	
Trichloroethene	ND	1.0	ug/L	SW846 8260B	
Trichlorofluoromethane	ND	1.0	ug/L	SW846 8260B	
1,1,2-Trichloro-1,2,2-trifluoroethane	ND	1.0	ug/L	SW846 8260B	
Vinyl chloride	ND	1.0	ug/L	SW846 8260B	
Xylenes (total)	ND	2.0	ug/L	SW846 8260B	

Client Sample ID: GW-35298-061704-BF-027
Sample #: 008 Date Sampled: 06/17/04 12:50 Date Received: 06/18/04 Matrix: WATER

Volatile Organics by GC/MS					Reviewed
1,2,4-Trimethylbenzene	ND	1.0	ug/L	SW846 8260B	
Acetone	ND	25	ug/L	SW846 8260B	
Benzene	ND	1.0	ug/L	SW846 8260B	
Bromodichloromethane	ND	1.0	ug/L	SW846 8260B	
Bromoform	ND	1.0	ug/L	SW846 8260B	
Bromomethane	ND	1.0	ug/L	SW846 8260B	
2-Butanone	ND	25	ug/L	SW846 8260B	
Carbon disulfide	ND	5.0	ug/L	SW846 8260B	
Carbon tetrachloride	ND	1.0	ug/L	SW846 8260B	
Chlorobenzene	ND	1.0	ug/L	SW846 8260B	
Chloroethane	ND	1.0	ug/L	SW846 8260B	
Chloroform	ND	1.0	ug/L	SW846 8260B	
Chloromethane	ND	1.0	ug/L	SW846 8260B	
Cyclohexane	ND	1.0	ug/L	SW846 8260B	
Dibromochloromethane	ND	1.0	ug/L	SW846 8260B	
1,2-Dibromo-3-chloro-propane	ND	1.0	ug/L	SW846 8260B	

(Continued on next page)

SEVERN TRENT LABORATORIES, INC.

PRELIMINARY DATA SUMMARY

The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Conestoga Rovers & Assoc., Inc
WOLVERINE GASKET
Project Number: 35298

Lot #: A4F180175 **Date Reported:** 7/07/04

Client Sample ID: GW-35298-061704-BF-027
Sample #: 008 Date Sampled: 06/17/04 12:50 Date Received: 06/18/04 Matrix: WATER

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD	
Volatile Organics by GC/MS					Reviewed
1,2-Dibromoethane	ND	1.0	ug/L	SW846 8260B	
1,2-Dichlorobenzene	ND	1.0	ug/L	SW846 8260B	
1,3-Dichlorobenzene	ND	1.0	ug/L	SW846 8260B	
1,4-Dichlorobenzene	ND	1.0	ug/L	SW846 8260B	
Dichlorodifluoromethane	ND	1.0	ug/L	SW846 8260B	
1,1-Dichloroethane	ND	1.0	ug/L	SW846 8260B	
1,2-Dichloroethane	ND	1.0	ug/L	SW846 8260B	
1,1-Dichloroethene	ND	1.0	ug/L	SW846 8260B	
cis-1,2-Dichloroethene	ND	1.0	ug/L	SW846 8260B	
trans-1,2-Dichloroethene	ND	1.0	ug/L	SW846 8260B	
1,2-Dichloropropane	ND	1.0	ug/L	SW846 8260B	
cis-1,3-Dichloropropene	ND	1.0	ug/L	SW846 8260B	
trans-1,3-Dichloropropene	ND	1.0	ug/L	SW846 8260B	
Ethylbenzene	ND	1.0	ug/L	SW846 8260B	
2-Hexanone	ND	50	ug/L	SW846 8260B	
Isopropylbenzene	ND	5.0	ug/L	SW846 8260B	
Methyl acetate	ND	10	ug/L	SW846 8260B	
Methylene chloride	ND	5.0	ug/L	SW846 8260B	
Methylcyclohexane	ND	1.0	ug/L	SW846 8260B	
4-Methyl-2-pentanone	ND	50	ug/L	SW846 8260B	
Methyl tert-butyl ether	ND	5.0	ug/L	SW846 8260B	
Styrene	ND	1.0	ug/L	SW846 8260B	
1,1,2,2-Tetrachloroethane	ND	1.0	ug/L	SW846 8260B	
Tetrachloroethene	ND	1.0	ug/L	SW846 8260B	
Toluene	ND	1.0	ug/L	SW846 8260B	
1,2,4-Trichloro-benzene	ND	5.0	ug/L	SW846 8260B	
1,1,1-Trichloroethane	ND	1.0	ug/L	SW846 8260B	
1,1,2-Trichloroethane	ND	1.0	ug/L	SW846 8260B	
Trichloroethene	ND	1.0	ug/L	SW846 8260B	
Trichlorofluoromethane	ND	1.0	ug/L	SW846 8260B	
1,1,2-Trichloro-1,2,2-trifluoroethane	ND	1.0	ug/L	SW846 8260B	
Vinyl chloride	ND	1.0	ug/L	SW846 8260B	
Xylenes (total)	ND	2.0	ug/L	SW846 8260B	

SEVERN TRENT LABORATORIES, INC.

PRELIMINARY DATA SUMMARY

The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Conestoga Rovers & Assoc., Inc PAGE 1

Lot #: A4F190114 WOLVERINE GASKET **Date Reported:** 7/02/04

Project Number: 35298

Client Sample ID: GW-35298-061704-BF-028

Sample #: 001 Date Sampled: 06/18/04 09:00 Date Received: 06/19/04 Matrix: WATER

PARAMETER		RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD	
Trace Inductively Coupled Plasma (ICP) Metals						Reviewed
Iron		**0.85**	**0.10**	**mg/L**	**SW846 6010B**	
Manganese		**0.35**	**0.015**	**mg/L**	**SW846 6010B**	
Iron	**Dissolved**	**0.16**	**0.10**	**mg/L**	**SW846 6010B**	
Manganese	**Dissolved**	**0.37**	**0.015**	**mg/L**	**SW846 6010B**	
Volatile Organics by GC/MS						In Review
1,2,4-Trimethylbenzene		ND	25	ug/L	SW846 8260B	
Acetone		ND	620	ug/L	SW846 8260B	
Benzene		**59**	**25**	**ug/L**	**SW846 8260B**	
Bromodichloromethane		ND	25	ug/L	SW846 8260B	
Bromoform		ND	25	ug/L	SW846 8260B	
Bromomethane		ND	25	ug/L	SW846 8260B	
2-Butanone		ND	620	ug/L	SW846 8260B	
Carbon disulfide		ND	120	ug/L	SW846 8260B	
Carbon tetrachloride		ND	25	ug/L	SW846 8260B	
Chlorobenzene		**650**	**25**	**ug/L**	**SW846 8260B**	
Chloroethane		ND	25	ug/L	SW846 8260B	
Chloroform		ND	25	ug/L	SW846 8260B	
Chloromethane		ND	25	ug/L	SW846 8260B	
Cyclohexane		ND	25	ug/L	SW846 8260B	
Dibromochloromethane		ND	25	ug/L	SW846 8260B	
1,2-Dibromo-3-chloro-propane		ND	25	ug/L	SW846 8260B	
1,2-Dibromoethane		ND	25	ug/L	SW846 8260B	
1,2-Dichlorobenzene		ND	25	ug/L	SW846 8260B	
1,3-Dichlorobenzene		ND	25	ug/L	SW846 8260B	
1,4-Dichlorobenzene		ND	25	ug/L	SW846 8260B	
Dichlorodifluoromethane		ND	25	ug/L	SW846 8260B	
1,1-Dichloroethane		**39**	**25**	**ug/L**	**SW846 8260B**	
1,2-Dichloroethane		ND	25	ug/L	SW846 8260B	
1,1-Dichloroethene		ND	25	ug/L	SW846 8260B	
cis-1,2-Dichloroethene		ND	25	ug/L	SW846 8260B	
trans-1,2-Dichloroethene		ND	25	ug/L	SW846 8260B	
1,2-Dichloropropane		ND	25	ug/L	SW846 8260B	
cis-1,3-Dichloropropene		ND	25	ug/L	SW846 8260B	
trans-1,3-Dichloropropene		ND	25	ug/L	SW846 8260B	

(Continued on next page)

SEVERN TRENT LABORATORIES, INC.

PRELIMINARY DATA SUMMARY

The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Conestoga Rovers & Assoc., Inc

Lot #: A4F190114

WOLVERINE GASKET

Project Number: 35298

Date Reported: 7/02/04

Client Sample ID: GW-35298-061704-BF-028

Sample #: 001 Date Sampled: 06/18/04 09:00 Date Received: 06/19/04 Matrix: WATER

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD	
Volatile Organics by GC/MS					In Review
Ethylbenzene	ND	25	ug/L	SW846 8260B	
2-Hexanone	ND	1200	ug/L	SW846 8260B	
Isopropylbenzene	ND	120	ug/L	SW846 8260B	
Methyl acetate	ND	250	ug/L	SW846 8260B	
Methylene chloride	ND	120	ug/L	SW846 8260B	
Methylcyclohexane	ND	25	ug/L	SW846 8260B	
4-Methyl-2-pentanone	ND	1200	ug/L	SW846 8260B	
Methyl tert-butyl ether	ND	120	ug/L	SW846 8260B	
Styrene	ND	25	ug/L	SW846 8260B	
1,1,2,2-Tetrachloroethane	ND	25	ug/L	SW846 8260B	
Tetrachloroethene	ND	25	ug/L	SW846 8260B	
Toluene	**190**	**25**	**ug/L**	**SW846 8260B**	
1,2,4-Trichloro-benzene	ND	120	ug/L	SW846 8260B	
1,1,1-Trichloroethane	ND	25	ug/L	SW846 8260B	
1,1,2-Trichloroethane	ND	25	ug/L	SW846 8260B	
Trichloroethene	ND	25	ug/L	SW846 8260B	
Trichlorofluoromethane	ND	25	ug/L	SW846 8260B	
1,1,2-Trichloro-1,2,2-trifluoroethane	ND	25	ug/L	SW846 8260B	
Vinyl chloride	ND	25	ug/L	SW846 8260B	
Xylenes (total)	**74**	**50**	**ug/L**	**SW846 8260B**	
Inorganic Analysis					Reviewed
Nitrite as N	**0.11**	**0.10**	**mg/L**	**MCAWW 300.0A**	
Nitrate as N	**0.32**	**0.10**	**mg/L**	**MCAWW 300.0A**	
Phosphate as P, Ortho	**2.3**	**0.50**	**mg/L**	**MCAWW 300.0A**	
Sulfate	**36.9**	**1.0**	**mg/L**	**MCAWW 300.0A**	
Ammonia Nitrogen	**7.3**	**1.0**	**mg/L**	**MCAWW 350.3**	
Sulfide	ND	1.0	mg/L	MCAWW 376.1	
Total Organic Carbon	**35**	**1**	**mg/L**	**MCAWW 415.1**	

(Continued on next page)

SEVERN TRENT LABORATORIES, INC.

PRELIMINARY DATA SUMMARY

The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Conestoga Rovers & Assoc., Inc

Lot #: A4F190114 WOLVERINE GASKET **Date Reported:** 7/02/04

Project Number: 35298

Client Sample ID: GW-35298-061704-BF-029

Sample #: 002 Date Sampled: 06/18/04 09:30 Date Received: 06/19/04 Matrix: WATER

PARAMETER		RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD	
Trace Inductively Coupled Plasma (ICP) Metals						Reviewed
Iron		**16.2**	**0.10**	**mg/L**	**SW846 6010B**	
Manganese		**0.52**	**0.015**	**mg/L**	**SW846 6010B**	
Iron	**Dissolved**	**16.9**	**0.10**	**mg/L**	**SW846 6010B**	
Manganese	**Dissolved**	**0.54**	**0.015**	**mg/L**	**SW846 6010B**	
Volatile Organics by GC/MS						In Review
1,2,4-Trimethylbenzene		ND	710	ug/L	SW846 8260B	
Acetone		ND	18000	ug/L	SW846 8260B	
Benzene		**20000**	**710**	**ug/L**	**SW846 8260B**	
Bromodichloromethane		ND	710	ug/L	SW846 8260B	
Bromoform		ND	710	ug/L	SW846 8260B	
Bromomethane		ND	710	ug/L	SW846 8260B	
2-Butanone		ND	18000	ug/L	SW846 8260B	
Carbon disulfide		ND	3600	ug/L	SW846 8260B	
Carbon tetrachloride		ND	710	ug/L	SW846 8260B	
Chlorobenzene		**3400**	**710**	**ug/L**	**SW846 8260B**	
Chloroethane		ND	710	ug/L	SW846 8260B	
Chloroform		ND	710	ug/L	SW846 8260B	
Chloromethane		ND	710	ug/L	SW846 8260B	
Cyclohexane		ND	710	ug/L	SW846 8260B	
Dibromochloromethane		ND	710	ug/L	SW846 8260B	
1,2-Dibromo-3-chloro-propane		ND	710	ug/L	SW846 8260B	
1,2-Dibromoethane		ND	710	ug/L	SW846 8260B	
1,2-Dichlorobenzene		ND	710	ug/L	SW846 8260B	
1,3-Dichlorobenzene		ND	710	ug/L	SW846 8260B	
1,4-Dichlorobenzene		ND	710	ug/L	SW846 8260B	
Dichlorodifluoromethane		ND	710	ug/L	SW846 8260B	
1,1-Dichloroethane		ND	710	ug/L	SW846 8260B	
1,2-Dichloroethane		ND	710	ug/L	SW846 8260B	
1,1-Dichloroethene		ND	710	ug/L	SW846 8260B	
cis-1,2-Dichloroethene		ND	710	ug/L	SW846 8260B	
trans-1,2-Dichloroethene		ND	710	ug/L	SW846 8260B	
1,2-Dichloropropane		ND	710	ug/L	SW846 8260B	
cis-1,3-Dichloropropene		ND	710	ug/L	SW846 8260B	
trans-1,3-Dichloropropene		ND	710	ug/L	SW846 8260B	

(Continued on next page)

SEVERN TRENT LABORATORIES, INC.

PRELIMINARY DATA SUMMARY

The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Conestoga Rovers & Assoc., Inc

Lot #: A4F190114 WOLVERINE GASKET **Date Reported:** 7/02/04

Project Number: 35298

Client Sample ID: GW-35298-061704-BF-029

Sample #: 002 Date Sampled: 06/18/04 09:30 Date Received: 06/19/04 Matrix: WATER

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD	
Volatile Organics by GC/MS					In Review
Ethylbenzene	ND	710	ug/L	SW846 8260B	
2-Hexanone	ND	36000	ug/L	SW846 8260B	
Isopropylbenzene	ND	3600	ug/L	SW846 8260B	
Methyl acetate	ND	7100	ug/L	SW846 8260B	
Methylene chloride	ND	3600	ug/L	SW846 8260B	
Methylcyclohexane	ND	710	ug/L	SW846 8260B	
4-Methyl-2-pentanone	ND	36000	ug/L	SW846 8260B	
Methyl tert-butyl ether	ND	3600	ug/L	SW846 8260B	
Styrene	ND	710	ug/L	SW846 8260B	
1,1,2,2-Tetrachloroethane	ND	710	ug/L	SW846 8260B	
Tetrachloroethene	ND	710	ug/L	SW846 8260B	
Toluene	ND	710	ug/L	SW846 8260B	
1,2,4-Trichloro-benzene	ND	3600	ug/L	SW846 8260B	
1,1,1-Trichloroethane	ND	710	ug/L	SW846 8260B	
1,1,2-Trichloroethane	ND	710	ug/L	SW846 8260B	
Trichloroethene	ND	710	ug/L	SW846 8260B	
Trichlorofluoromethane	ND	710	ug/L	SW846 8260B	
1,1,2-Trichloro-1,2,2-trifluoroethane	ND	710	ug/L	SW846 8260B	
Vinyl chloride	ND	710	ug/L	SW846 8260B	
Xylenes (total)	ND	1400	ug/L	SW846 8260B	
Inorganic Analysis					Reviewed
Nitrite as N	ND	0.50	mg/L	MCAWW 300.0A	
Nitrate as N	ND	0.10	mg/L	MCAWW 300.0A	
Phosphate as P, Ortho	ND	0.50	mg/L	MCAWW 300.0A	
Sulfate	ND	1.0	mg/L	MCAWW 300.0A	
Ammonia Nitrogen	**0.9**	**0.2**	**mg/L**	**MCAWW 350.3**	
Sulfide	ND	1.0	mg/L	MCAWW 376.1	
Total Organic Carbon	**8**	**1**	**mg/L**	**MCAWW 415.1**	

(Continued on next page)

SEVERN TRENT LABORATORIES, INC.

PRELIMINARY DATA SUMMARY

The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Conestoga Rovers & Assoc., Inc

Lot #: A4F190114 WOLVERINE GASKET **Date Reported:** 7/02/04

Project Number: 35298

Client Sample ID: GW-35298-061704-BF-032

Sample #: 003 Date Sampled: 06/18/04 12:00 Date Received: 06/19/04 Matrix: WATER

PARAMETER		RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD	
Trace Inductively Coupled Plasma (ICP) Metals						Reviewed
Iron		**7.8**	**0.10**	**mg/L**	**SW846 6010B**	
Manganese		**0.59**	**0.015**	**mg/L**	**SW846 6010B**	
Iron	**Dissolved**	**8.1**	**0.10**	**mg/L**	**SW846 6010B**	
Manganese	**Dissolved**	**0.65**	**0.015**	**mg/L**	**SW846 6010B**	
Volatile Organics by GC/MS						In Review
1,2,4-Trimethylbenzene		ND	250	ug/L	SW846 8260B	
Acetone		ND	6200	ug/L	SW846 8260B	
Benzene		ND	250	ug/L	SW846 8260B	
Bromodichloromethane		ND	250	ug/L	SW846 8260B	
Bromoform		ND	250	ug/L	SW846 8260B	
Bromomethane		ND	250	ug/L	SW846 8260B	
2-Butanone		ND	6200	ug/L	SW846 8260B	
Carbon disulfide		ND	1200	ug/L	SW846 8260B	
Carbon tetrachloride		ND	250	ug/L	SW846 8260B	
Chlorobenzene		**8500**	**250**	**ug/L**	**SW846 8260B**	
Chloroethane		ND	250	ug/L	SW846 8260B	
Chloroform		ND	250	ug/L	SW846 8260B	
Chloromethane		ND	250	ug/L	SW846 8260B	
Cyclohexane		ND	250	ug/L	SW846 8260B	
Dibromochloromethane		ND	250	ug/L	SW846 8260B	
1,2-Dibromo-3-chloro-propane		ND	250	ug/L	SW846 8260B	
1,2-Dibromoethane		ND	250	ug/L	SW846 8260B	
1,2-Dichlorobenzene		ND	250	ug/L	SW846 8260B	
1,3-Dichlorobenzene		ND	250	ug/L	SW846 8260B	
1,4-Dichlorobenzene		ND	250	ug/L	SW846 8260B	
Dichlorodifluoromethane		ND	250	ug/L	SW846 8260B	
1,1-Dichloroethane		ND	250	ug/L	SW846 8260B	
1,2-Dichloroethane		ND	250	ug/L	SW846 8260B	
1,1-Dichloroethene		ND	250	ug/L	SW846 8260B	
cis-1,2-Dichloroethene		ND	250	ug/L	SW846 8260B	
trans-1,2-Dichloroethene		ND	250	ug/L	SW846 8260B	
1,2-Dichloropropane		ND	250	ug/L	SW846 8260B	
cis-1,3-Dichloropropene		ND	250	ug/L	SW846 8260B	
trans-1,3-Dichloropropene		ND	250	ug/L	SW846 8260B	

(Continued on next page)

SEVERN TRENT LABORATORIES, INC.

PRELIMINARY DATA SUMMARY

The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Conestoga Rovers & Assoc., Inc

Lot #: A4F190114 WOLVERINE GASKET **Date Reported:** 7/02/04

Project Number: 35298

Client Sample ID: GW-35298-061704-BF-032

Sample #: 003 Date Sampled: 06/18/04 12:00 Date Received: 06/19/04 Matrix: WATER

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD	
Volatile Organics by GC/MS					In Review
Ethylbenzene	**370**	**250**	**ug/L**	**SW846 8260B**	
2-Hexanone	ND	12000	ug/L	SW846 8260B	
Isopropylbenzene	ND	1200	ug/L	SW846 8260B	
Methyl acetate	ND	2500	ug/L	SW846 8260B	
Methylene chloride	ND	1200	ug/L	SW846 8260B	
Methylcyclohexane	ND	250	ug/L	SW846 8260B	
4-Methyl-2-pentanone	ND	12000	ug/L	SW846 8260B	
Methyl tert-butyl ether	ND	1200	ug/L	SW846 8260B	
Styrene	ND	250	ug/L	SW846 8260B	
1,1,2,2-Tetrachloroethane	ND	250	ug/L	SW846 8260B	
Tetrachloroethene	ND	250	ug/L	SW846 8260B	
Toluene	**7500**	**250**	**ug/L**	**SW846 8260B**	
1,2,4-Trichloro-benzene	ND	1200	ug/L	SW846 8260B	
1,1,1-Trichloroethane	ND	250	ug/L	SW846 8260B	
1,1,2-Trichloroethane	ND	250	ug/L	SW846 8260B	
Trichloroethene	ND	250	ug/L	SW846 8260B	
Trichlorofluoromethane	ND	250	ug/L	SW846 8260B	
1,1,2-Trichloro-1,2,2-trifluoroethane	ND	250	ug/L	SW846 8260B	
Vinyl chloride	ND	250	ug/L	SW846 8260B	
Xylenes (total)	**1400**	**500**	**ug/L**	**SW846 8260B**	
Inorganic Analysis					Reviewed
Nitrite as N	ND	0.10	mg/L	MCAWW 300.0A	
Nitrate as N	ND	0.10	mg/L	MCAWW 300.0A	
Phosphate as P, Ortho	ND	0.50	mg/L	MCAWW 300.0A	
Sulfate	**68.5**	**1.0**	**mg/L**	**MCAWW 300.0A**	
Ammonia Nitrogen	**0.5**	**0.2**	**mg/L**	**MCAWW 350.3**	
Sulfide	ND	1.0	mg/L	MCAWW 376.1	
Total Organic Carbon	**14**	**1**	**mg/L**	**MCAWW 415.1**	

(Continued on next page)

SEVERN TRENT LABORATORIES, INC.

PRELIMINARY DATA SUMMARY

The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Conestoga Rovers & Assoc., Inc

Lot #: A4F190114 WOLVERINE GASKET **Date Reported:** 7/02/04

Project Number: 35298

Client Sample ID: GW-35298-061704-BF-033

Sample #: 004 Date Sampled: 06/18/04 12:20 Date Received: 06/19/04 Matrix: WATER

PARAMETER		RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD	
Trace Inductively Coupled Plasma (ICP) Metals						Reviewed
Iron		**1.7**	**0.10**	**mg/L**	**SW846 6010B**	
Manganese		**1.3**	**0.015**	**mg/L**	**SW846 6010B**	
Iron	**Dissolved**	**1.6**	**0.10**	**mg/L**	**SW846 6010B**	
Manganese	**Dissolved**	**1.3**	**0.015**	**mg/L**	**SW846 6010B**	
Volatile Organics by GC/MS						In Review
1,2,4-Trimethylbenzene		ND	3300	ug/L	SW846 8260B	
Acetone		ND	83000	ug/L	SW846 8260B	
Benzene		**14000**	**3300**	**ug/L**	**SW846 8260B**	
Bromodichloromethane		ND	3300	ug/L	SW846 8260B	
Bromoform		ND	3300	ug/L	SW846 8260B	
Bromomethane		ND	3300	ug/L	SW846 8260B	
2-Butanone		ND	83000	ug/L	SW846 8260B	
Carbon disulfide		ND	17000	ug/L	SW846 8260B	
Carbon tetrachloride		ND	3300	ug/L	SW846 8260B	
Chlorobenzene		**86000**	**3300**	**ug/L**	**SW846 8260B**	
Chloroethane		ND	3300	ug/L	SW846 8260B	
Chloroform		ND	3300	ug/L	SW846 8260B	
Chloromethane		ND	3300	ug/L	SW846 8260B	
Cyclohexane		ND	3300	ug/L	SW846 8260B	
Dibromochloromethane		ND	3300	ug/L	SW846 8260B	
1,2-Dibromo-3-chloro-propane		ND	3300	ug/L	SW846 8260B	
1,2-Dibromoethane		ND	3300	ug/L	SW846 8260B	
1,2-Dichlorobenzene		ND	3300	ug/L	SW846 8260B	
1,3-Dichlorobenzene		ND	3300	ug/L	SW846 8260B	
1,4-Dichlorobenzene		ND	3300	ug/L	SW846 8260B	
Dichlorodifluoromethane		ND	3300	ug/L	SW846 8260B	
1,1-Dichloroethane		ND	3300	ug/L	SW846 8260B	
1,2-Dichloroethane		ND	3300	ug/L	SW846 8260B	
1,1-Dichloroethene		ND	3300	ug/L	SW846 8260B	
cis-1,2-Dichloroethene		ND	3300	ug/L	SW846 8260B	
trans-1,2-Dichloroethene		ND	3300	ug/L	SW846 8260B	
1,2-Dichloropropane		ND	3300	ug/L	SW846 8260B	
cis-1,3-Dichloropropene		ND	3300	ug/L	SW846 8260B	
trans-1,3-Dichloropropene		ND	3300	ug/L	SW846 8260B	

(Continued on next page)

SEVERN TRENT LABORATORIES, INC.

PRELIMINARY DATA SUMMARY

The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Conestoga Rovers & Assoc., Inc

Lot #: A4F190114

WOLVERINE GASKET

Project Number: 35298

Date Reported: 7/02/04

Client Sample ID: GW-35298-061704-BF-033

Sample #: 004 Date Sampled: 06/18/04 12:20 Date Received: 06/19/04 Matrix: WATER

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD	
Volatile Organics by GC/MS					In Review
Ethylbenzene	**4200**	**3300**	**ug/L**	**SW846 8260B**	
2-Hexanone	ND	170000	ug/L	SW846 8260B	
Isopropylbenzene	ND	17000	ug/L	SW846 8260B	
Methyl acetate	ND	33000	ug/L	SW846 8260B	
Methylene chloride	ND	17000	ug/L	SW846 8260B	
Methylcyclohexane	ND	3300	ug/L	SW846 8260B	
4-Methyl-2-pentanone	ND	170000	ug/L	SW846 8260B	
Methyl tert-butyl ether	ND	17000	ug/L	SW846 8260B	
Styrene	ND	3300	ug/L	SW846 8260B	
1,1,2,2-Tetrachloroethane	ND	3300	ug/L	SW846 8260B	
Tetrachloroethene	ND	3300	ug/L	SW846 8260B	
Toluene	**9000**	**3300**	**ug/L**	**SW846 8260B**	
1,2,4-Trichloro-benzene	ND	17000	ug/L	SW846 8260B	
1,1,1-Trichloroethane	ND	3300	ug/L	SW846 8260B	
1,1,2-Trichloroethane	ND	3300	ug/L	SW846 8260B	
Trichloroethene	ND	3300	ug/L	SW846 8260B	
Trichlorofluoromethane	ND	3300	ug/L	SW846 8260B	
1,1,2-Trichloro-1,2,2-trifluoroethane	ND	3300	ug/L	SW846 8260B	
Vinyl chloride	ND	3300	ug/L	SW846 8260B	
Xylenes (total)	**15000**	**6700**	**ug/L**	**SW846 8260B**	
Inorganic Analysis					Reviewed
Nitrite as N	ND	0.10	mg/L	MCAWW 300.0A	
Nitrate as N	ND	0.10	mg/L	MCAWW 300.0A	
Phosphate as P, Ortho	**1.1**	**0.50**	**mg/L**	**MCAWW 300.0A**	
Sulfate	**11.5**	**1.0**	**mg/L**	**MCAWW 300.0A**	
Ammonia Nitrogen	**12**	**1.0**	**mg/L**	**MCAWW 350.3**	
Sulfide	ND	1.0	mg/L	MCAWW 376.1	
Total Organic Carbon	**15**	**1**	**mg/L**	**MCAWW 415.1**	

Table 2. Summary of Groundwater Analytical Data, Eagle-Picher Automotive Group, Wolverine Gasket Division, Inkster, Michigan.

Constituent Sample Identification Date Sampled	Benzene	Toluene	Ethylbenzene	Xylenes
MW-1				
11/14/2000	**13,000**	1,300	180	550
5/22/2001	580	460	210	840
1/14/2002	6200	63	62	120
9/27/2002	NS	NS	NS	NS
MW-2				
11/14/2000	110	**69,000**	720	3,300
5/22/2001	320	**140,000**	3,600	17,000
1/14/2002	<1.0	**32,000**	1,200	5,500
9/27/2002	78	**100,000**	4,400	21,000
MW-3				
11/14/2000	7,700	470	200	350
5/22/2001	4,100	3,100	470	1,800
1/14/2002	7,400	2,500	520	1,500
9/27/2002	15,000	670	520	1,200
MW-6				
11/14/2000	<1.0	<1.0	<1.0	<3.0
5/22/2001	<1.0	<1.0	<1.0	<3.0
1/14/2002	<1.0	<1.0	<1.0	<3.0
9/27/2002	<1.0	<1.0	<1.0	<3.0
MW-7				
11/14/2000	8,800	14,000	5,000	22,000
5/22/2001	2,600	4,400	2,400	10,000
1/14/2002	6,400	9,400	4,800	20,000
9/27/2002	6,600	410	760	3,000
Groundwater Contract Criteria	11,000	530,000	170,000	186,000
Flammability and Explosivity Screening Level	34,000	31,000	22,000	35,000

See page 2 for notes.

g:common\eagle picher\3rdqtr02\table 2 gw data

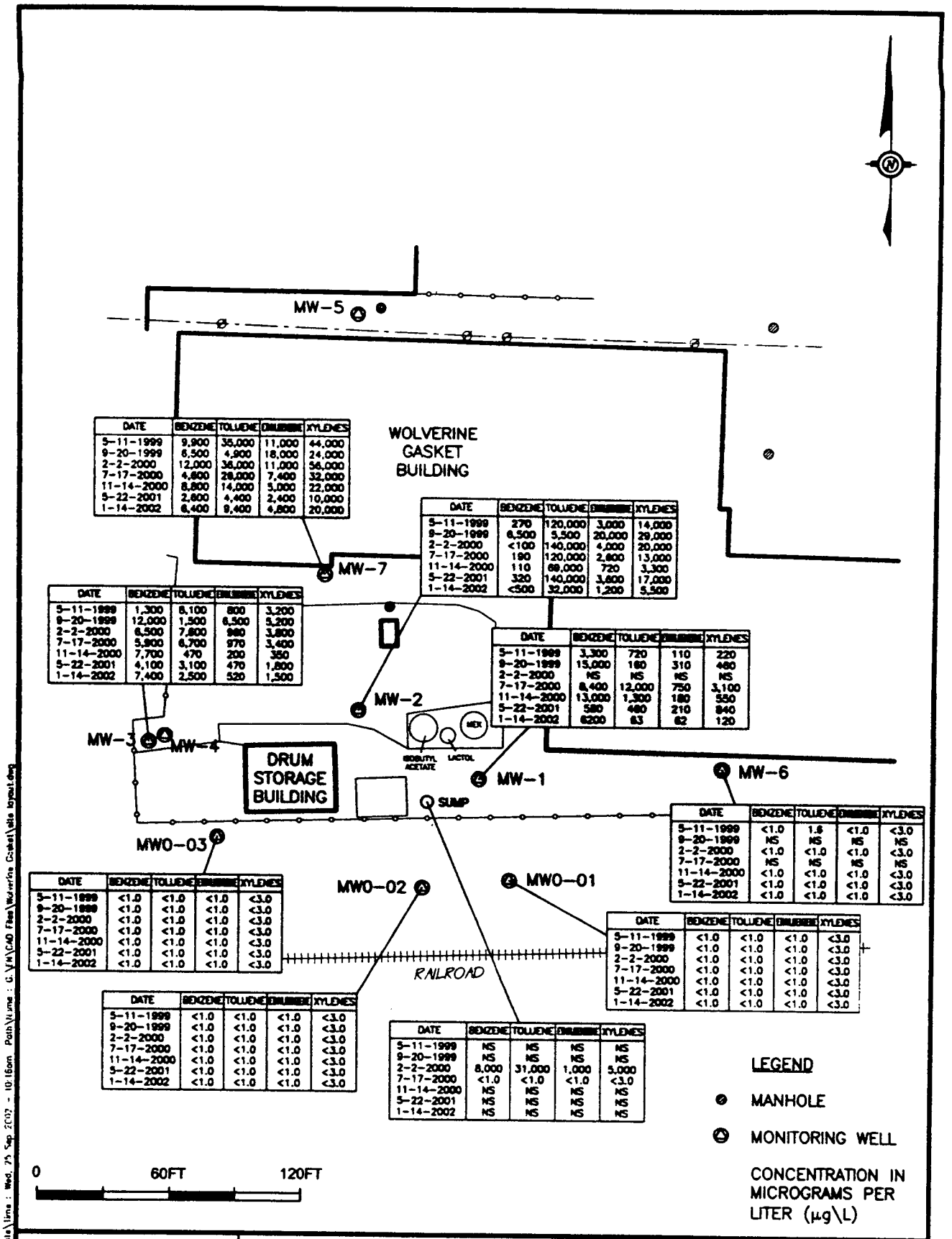
Table 2. Summary of Groundwater Analytical Data, Eagle-Picher Automotive Group, Wolverine Gasket Division, Inkster, Michigan.

Constituent Sample Identification Date Sampled	Benzene	Toluene	Ethylbenzene	Xylenes
MWO-01				
11/14/2000	<1.0	<1.0	<1.0	<3.0
5/22/2001	<1.0	<1.0	<1.0	<3.0
1/14/2002	<1.0	<1.0	<1.0	<3.0
9/27/2002	<1.0	<1.0	<1.0	<3.0
MWO-02				
11/14/2000	<1.0	<1.0	<1.0	<3.0
5/22/2001	<1.0	<1.0	<1.0	<3.0
1/14/2002	<1.0	<1.0	<1.0	<3.0
9/27/2002	**3.0**	**3.3**	**1.4**	**<3.0**
MWO-03				
11/14/2000	<1.0	<1.0	<1.0	<3.0
5/22/2001	<1.0	<1.0	<1.0	<3.0
1/14/2002	<1.0	<1.0	<1.0	<3.0
9/27/2002	<1.0	<1.0	<1.0	<3.0
Groundwater Contract Criteria	11,000	530,000	170,000	186,000
Flammability and Explosivity Screening Level	34,000	31,000	22,000	35,000

Notes:

< Constituent concentration was less than indicated concentration.
NS Constituent was not sampled during monitoring event.
All units reported in micrograms per liter (µg/L).
Bold values indicate concentrations exceeding relevant criteria.

g:common\eagle picher\3rdqtr02\table 2 gw data



DATE	BENZENE	TOLUENE	ETHYLBENZENE	XYLENES
5-11-1999	9,900	35,000	11,000	44,000
9-20-1999	6,500	4,900	18,000	24,000
2-2-2000	12,000	36,000	11,000	56,000
7-17-2000	4,600	28,000	7,400	32,000
11-14-2000	8,800	14,000	5,000	22,000
5-22-2001	2,600	4,400	2,400	10,000
1-14-2002	6,400	9,400	4,800	20,000

DATE	BENZENE	TOLUENE	ETHYLBENZENE	XYLENES
5-11-1999	270	120,000	3,000	14,000
9-20-1999	6,500	5,500	20,000	29,000
2-2-2000	<100	140,000	4,000	20,000
7-17-2000	190	120,000	2,600	13,000
11-14-2000	110	69,000	720	3,300
5-22-2001	320	140,000	3,600	17,000
1-14-2002	<500	32,000	1,200	5,500

DATE	BENZENE	TOLUENE	ETHYLBENZENE	XYLENES
5-11-1999	1,300	8,100	800	3,200
9-20-1999	12,000	1,500	6,500	5,200
2-2-2000	6,500	7,800	980	3,800
7-17-2000	5,900	6,700	970	3,400
11-14-2000	7,700	470	200	350
5-22-2001	4,100	3,100	470	1,800
1-14-2002	7,400	2,500	520	1,500

DATE	BENZENE	TOLUENE	ETHYLBENZENE	XYLENES
5-11-1999	3,300	720	110	220
9-20-1999	15,000	160	310	460
2-2-2000	NS	NS	NS	NS
7-17-2000	8,400	12,000	750	3,100
11-14-2000	13,000	1,300	180	550
5-22-2001	580	480	210	840
1-14-2002	6200	83	82	120

DATE	BENZENE	TOLUENE	ETHYLBENZENE	XYLENES
5-11-1999	<1.0	1.6	<1.0	<3.0
9-20-1999	NS	NS	NS	NS
2-2-2000	<1.0	<1.0	<1.0	<3.0
7-17-2000	NS	NS	NS	NS
11-14-2000	<1.0	<1.0	<1.0	<3.0
5-22-2001	<1.0	<1.0	<1.0	<3.0
1-14-2002	<1.0	<1.0	<1.0	<3.0

DATE	BENZENE	TOLUENE	ETHYLBENZENE	XYLENES
5-11-1999	<1.0	<1.0	<1.0	<3.0
9-20-1999	<1.0	<1.0	<1.0	<3.0
2-2-2000	<1.0	<1.0	<1.0	<3.0
7-17-2000	<1.0	<1.0	<1.0	<3.0
11-14-2000	<1.0	<1.0	<1.0	<3.0
5-22-2001	<1.0	<1.0	<1.0	<3.0
1-14-2002	<1.0	<1.0	<1.0	<3.0

DATE	BENZENE	TOLUENE	ETHYLBENZENE	XYLENES
5-11-1999	<1.0	<1.0	<1.0	<3.0
9-20-1999	<1.0	<1.0	<1.0	<3.0
2-2-2000	<1.0	<1.0	<1.0	<3.0
7-17-2000	<1.0	<1.0	<1.0	<3.0
11-14-2000	<1.0	<1.0	<1.0	<3.0
5-22-2001	<1.0	<1.0	<1.0	<3.0
1-14-2002	<1.0	<1.0	<1.0	<3.0

DATE	BENZENE	TOLUENE	ETHYLBENZENE	XYLENES
5-11-1999	<1.0	<1.0	<1.0	<3.0
9-20-1999	<1.0	<1.0	<1.0	<3.0
2-2-2000	<1.0	<1.0	<1.0	<3.0
7-17-2000	<1.0	<1.0	<1.0	<3.0
11-14-2000	<1.0	<1.0	<1.0	<3.0
5-22-2001	<1.0	<1.0	<1.0	<3.0
1-14-2002	<1.0	<1.0	<1.0	<3.0

DATE	BENZENE	TOLUENE	ETHYLBENZENE	XYLENES
5-11-1999	NS	NS	NS	NS
9-20-1999	NS	NS	NS	NS
2-2-2000	8,000	31,000	1,000	5,000
7-17-2000	<1.0	<1.0	<1.0	<3.0
11-14-2000	NS	NS	NS	NS
5-22-2001	NS	NS	NS	NS
1-14-2002	NS	NS	NS	NS

LEGEND

MANHOLE

MONITORING WELL

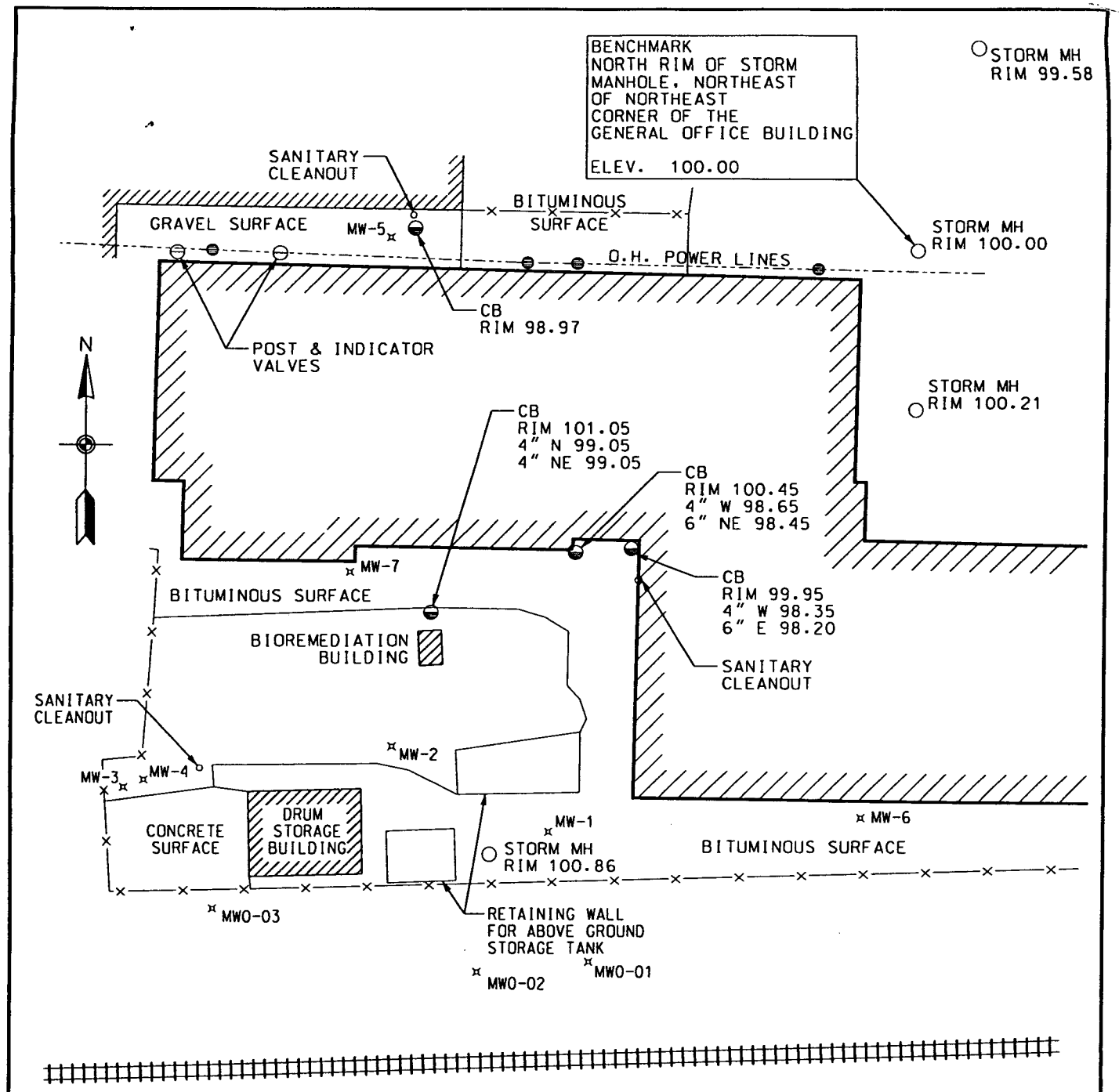
CONCENTRATION IN MICROGRAMS PER LITER (µg\L)

ARCADIS
25200 TELEGRAPH ROAD
SOUTHFIELD, MICHIGAN 48034
TEL: 248.936.8000
FAX: 248.936.8111

HISTORICAL GROUNDWATER IMPACTS
EAGLE-PICHER AUTOMOTIVE
WOLVERINE GASKET DIVISION
INKSTER, MICHIGAN

DATE	PROJECT MANAGER	DRAWING NAME
23-SEP-02	J. QUINNAN	site layout
DRAWN TRY	LEAD DESIGN PROF.	CHECKED K. WILSON
PROJECT NUMBER		FIGURE NUMBER
MI000745.0003		3

User Name : Trabrough Data\Jma : Wed, 25 Sep 2002 - 10:16am Path\Jume : G:\JM\CAD Files\Wolverine Gasket\site layout.dwg



MONITORING WELL	NORTHING	EASTING	TOP OF CASING	GROUND
MW-1	4997.7421	4975.2996	100.50	101.02
MW-2	5028.1949	4919.7637	103.62	102.24
MW-3	5013.5422	4825.0109	103.44	101.56
MW-4	5016.2744	4832.1062	103.47	101.71
MW-5	5208.0127	4918.4811	101.42	99.28
MW-6	5002.9457	5084.6427	101.34	101.47
MW-7	5089.8358	4904.8012	100.53	100.87
MWO-01	4951.8188	4989.5615	103.52	101.73
MWO-02	4948.1689	4949.7250	104.15	102.36
MWO-03	4970.6323	4856.2297	103.97	102.14

LEGEND
- STORM MH
- STORM MH
- SANITARY CLEANOUT
- MW-2 MONITORING WELL

EAGLE - PICHER AUTOMOTIVE
WOLVERINE GASKET DIVISION
2638 PRINCESS STREET
INKSTER, MICHIGAN

DATE 09/18/02
DRN PVMW
CHD REH

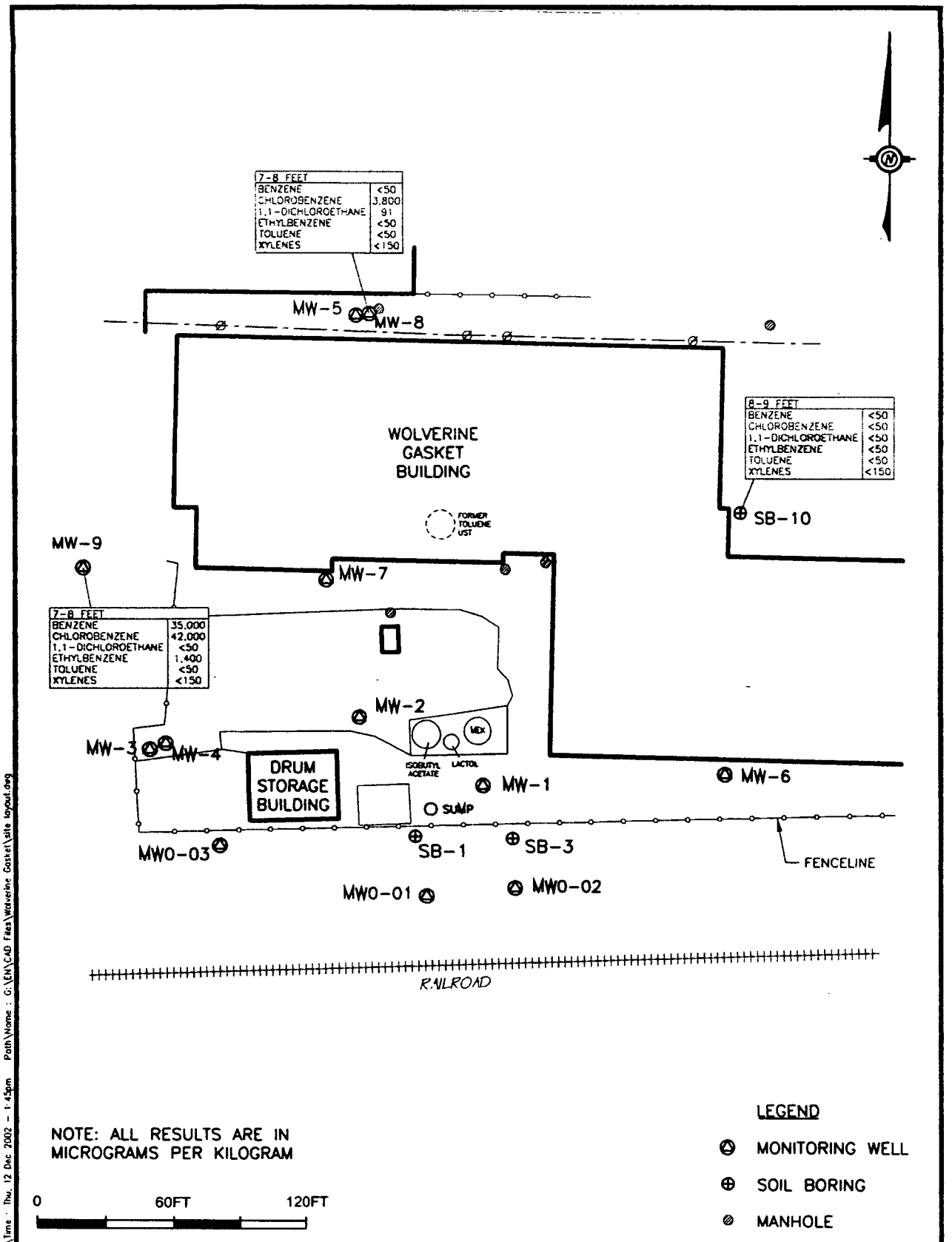
Wilcox Professional Services
ISO 9001 CERTIFIED

CLIENT: ARCADIS GERAGHTY & MILLER

SCALE 1"=50'
F.B. 910 PG. 69
SHEET 1 OF 1
JOB NO. 2002-481

p:\PROJECTS\2002\400\2002-481\cadd\2002481(2D).dgn 09/19/2002 09:28:29 AM

MI0012728



NOTE: ALL RESULTS ARE IN MICROGRAMS PER KILOGRAM

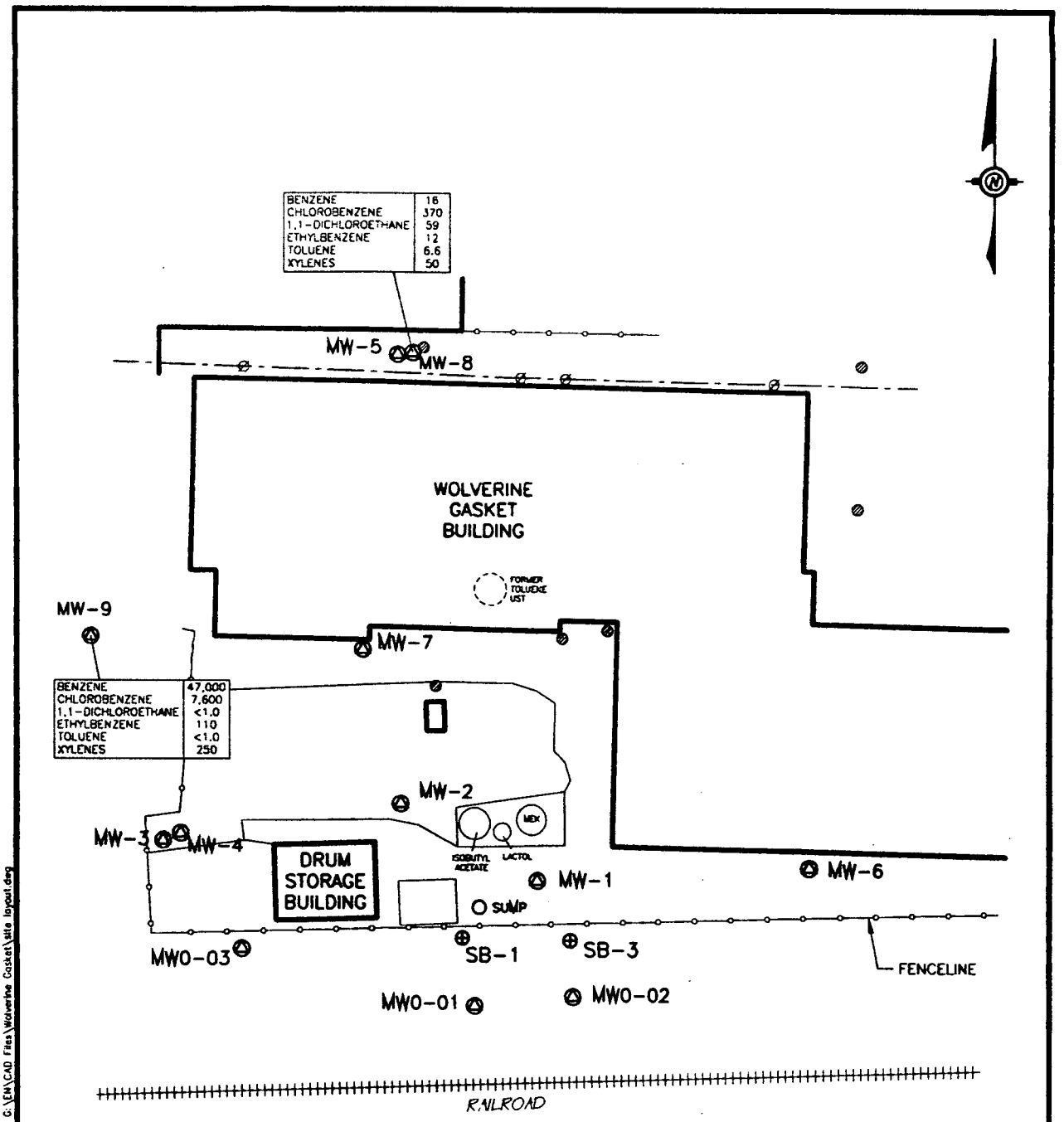
0 60FT 120FT

LEGEND

- MONITORING WELL
- SOIL BORING
- MANHOLE

User Name : Trarbrough Date\Time : Thu, 12 Dec 2002 - 1:45pm Path\Name : G:\EN\CAD Files\Wolverine Gasket\site layout.dwg

ARCADIS 25200 TELEGRAPH ROAD SOUTHFIELD, MICHIGAN 48034 TEL: 248.936.8000 FAX: 248.936.8111	SOIL ANALYTICAL RESULTS NOVEMBER 11, 2002 EAGLE-PICHER AUTOMOTIVE GROUP WOLVERINE GASKET DIVISION INKSTER, MICHIGAN	DATE 09-DEC-02	PROJECT MANAGER J. QUINNAN	DRAWING NAME site layout
		DRAWN TRY	LEAD DESIGN PROF.	CHECKED K. WILSON
		PROJECT NUMBER MI000745.0003		FIGURE NUMBER 5



NOTE: ALL RESULTS ARE IN MICROGRAMS PER LITER

0 60FT 120FT

LEGEND

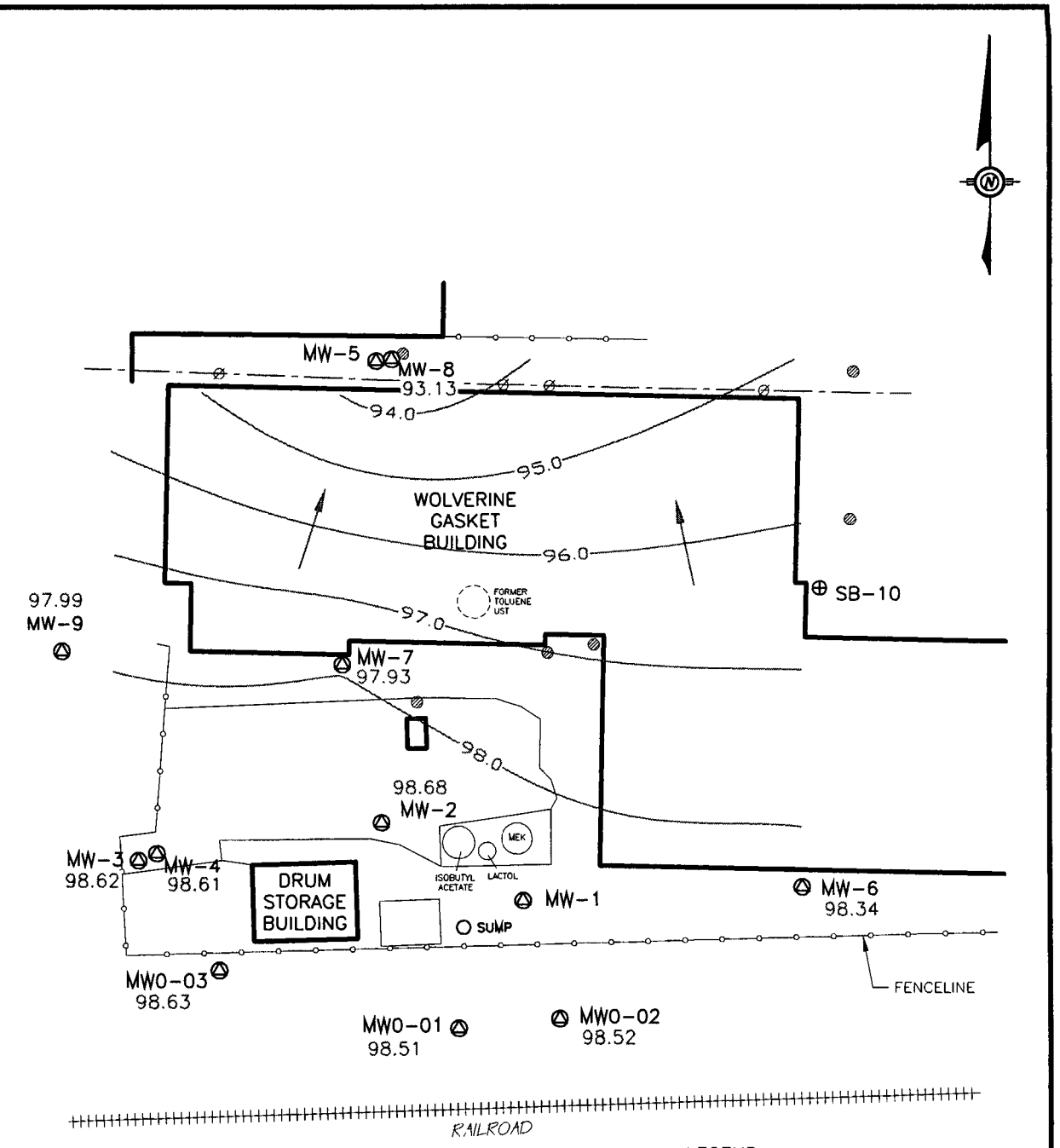
- MONITORING WELL
- SOIL BORING
- MANHOLE

User Name : Trarbough Date\Time : Thu, 12 Dec 2002 - 1:45pm Path\Name : G:\EM\CAD Files\Wolverine Gasket\site layout.dwg

ARCADIS
25200 TELEGRAPH ROAD
SOUTHFIELD, MICHIGAN 48034
TEL: 248.936.8000
FAX: 248.936.8111

GW ANALYTICAL RESULTS
NOVEMBER 11, 2002
EAGLE-PICHER AUTOMOTIVE GROUP
WOLVERINE GASKET DIVISION
INKSTER, MICHIGAN

DATE	PROJECT MANAGER	DRAWING NAME
09-DEC-02	J. QUINNAN	site layout
DRAWN TRY	LEAD DESIGN PROF.	CHECKED K. WILSON
PROJECT NUMBER		FIGURE NUMBER
MI000745.0003		6



LEGEND

⊘	MANHOLE
⊕	SOIL BORING
△	MONITORING WELL
97.57	GROUNDWATER ELEVATION
— 98.0 —	GROUNDWATER-ELEVATION CONTOUR
→	GROUNDWATER-FLOW DIRECTION

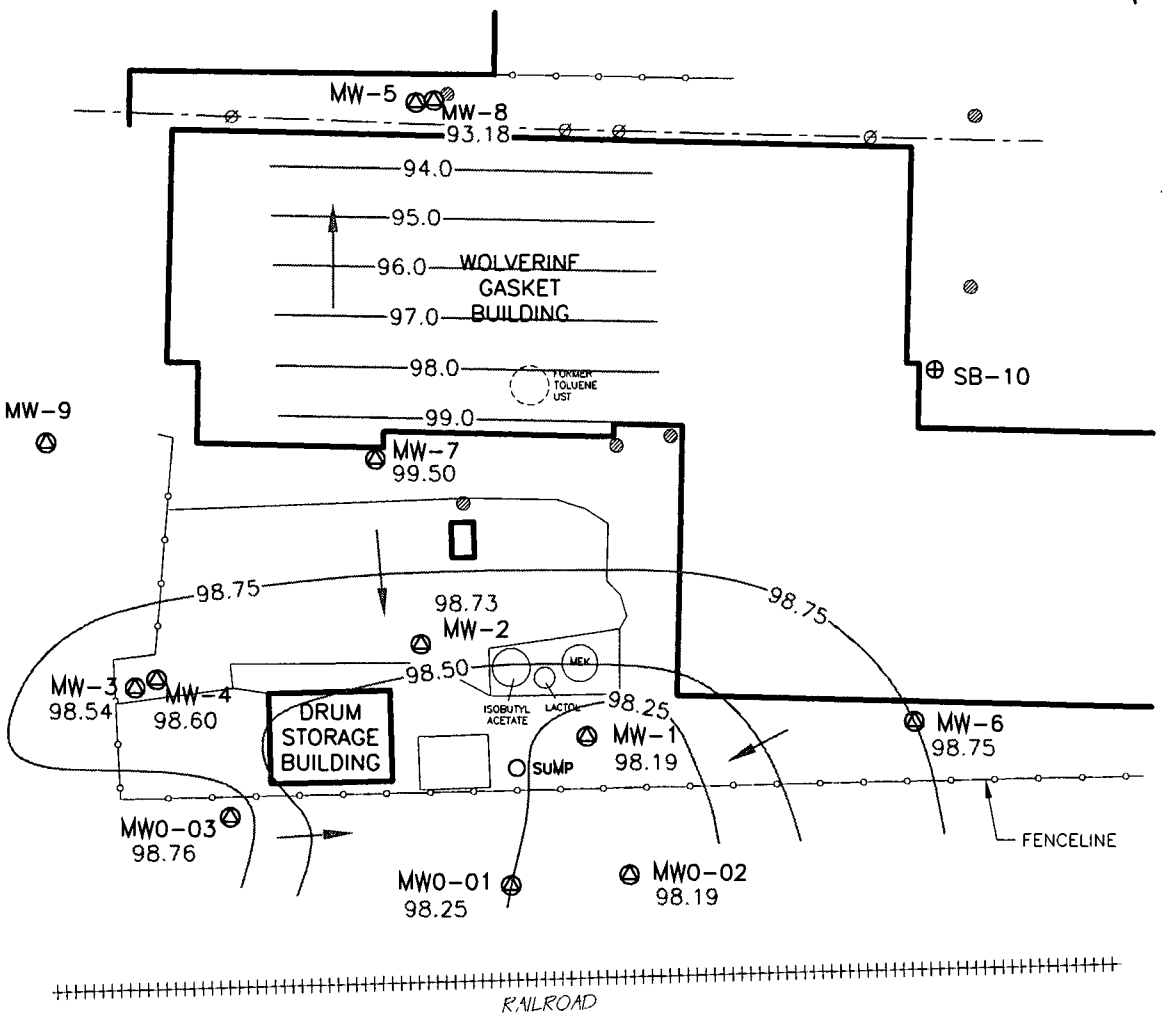
0 60FT 120FT

ARCADIS
25200 TELEGRAPH ROAD
SOUTHFIELD, MICHIGAN 48034
TEL: 248.936.8000
FAX: 248.936.8111

PERCHED GROUNDWATER
ELEVATION DECEMBER 12, 2002
EAGLE-PICHER AUTOMOTIVE GROUP
WOLVERINE GASKET DIVISION
INKSTER, MICHIGAN

DATE	PROJECT MANAGER	DRAWING NAME
23-OCT-02	J. QUINNAN	site layout
DRAWN	LEAD DESIGN PROF.	CHECKED
TRY		K. WILSON
PROJECT NUMBER		FIGURE NUMBER
MI000745.0003		4

User Name : Tranbrough Date\Time : Thu, 12 Dec 2002 - 1:44pm Path\Name : G:\EN\CAD Files\Wolverine Gasket\site layout.dwg



LEGEND

⊘	MANHOLE
⊕	SOIL BORING
△	MONITORING WELL
97.57	GROUNDWATER ELEVATION
— 98.0 —	GROUNDWATER-ELEVATION CONTOUR
→	GROUNDWATER-FLOW DIRECTION

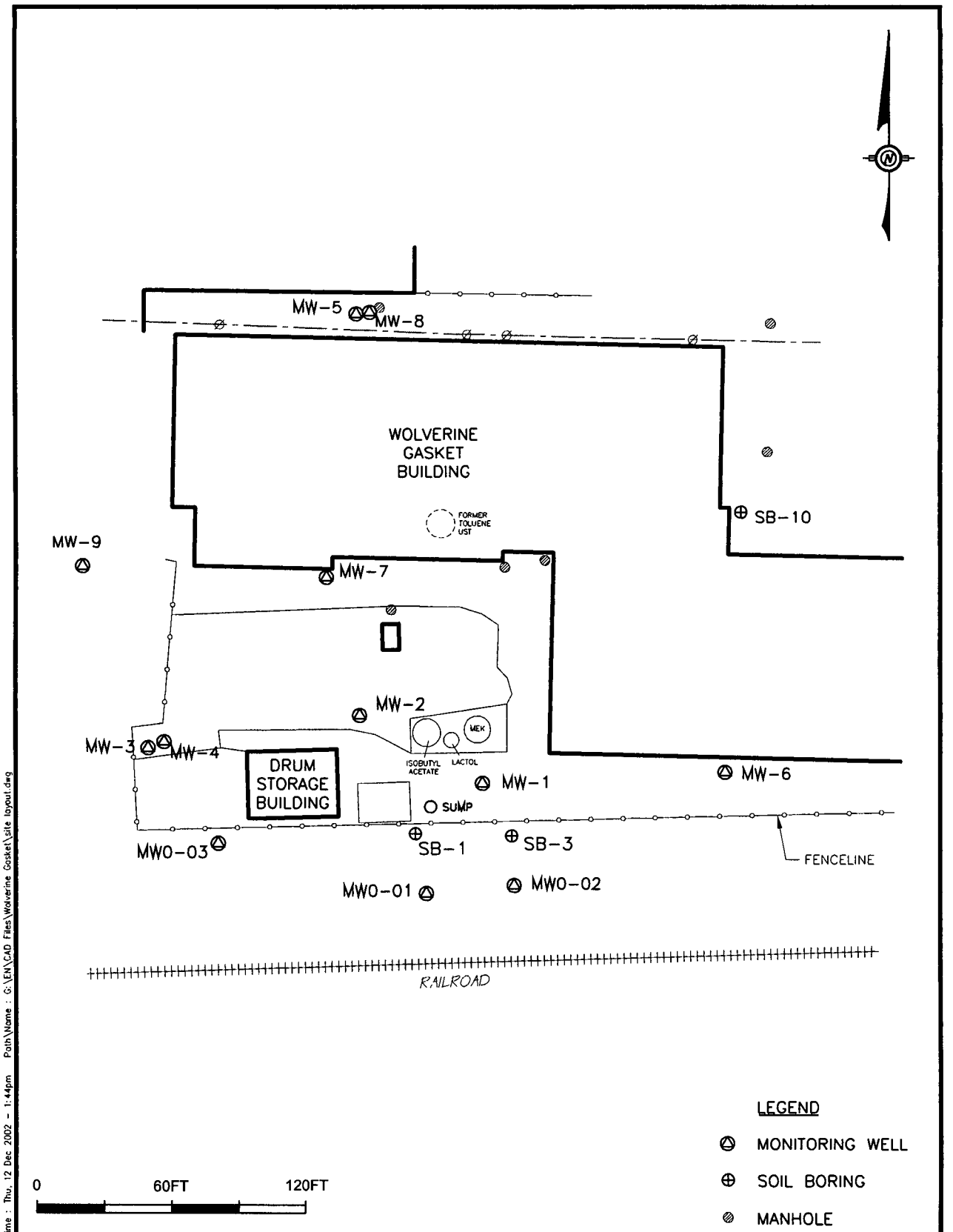
0 60FT 120FT

ARCADIS
25200 TELEGRAPH ROAD
SOUTHFIELD, MICHIGAN 48034
TEL: 248.936.8000
FAX: 248.936.8111

PERCHED GROUNDWATER
ELEVATION NOVEMBER 11, 2002
EAGLE-PICHER AUTOMOTIVE GROUP
WOLVERINE GASKET DIVISION
INKSTER, MICHIGAN

DATE	PROJECT MANAGER	DRAWING NAME
23-OCT-02	J. QUINNAN	site layout
DRAWN	LEAD DESIGN PROF.	CHECKED
TRY		K. WILSON
PROJECT NUMBER		FIGURE NUMBER
MI000745.0003		3

User Name : TYarbrough Date\Time : Thu, 12 Dec 2002 - 1:44pm Path\Name : G:\EN\CAD Files\Wolverine Gasket\site layout.dwg

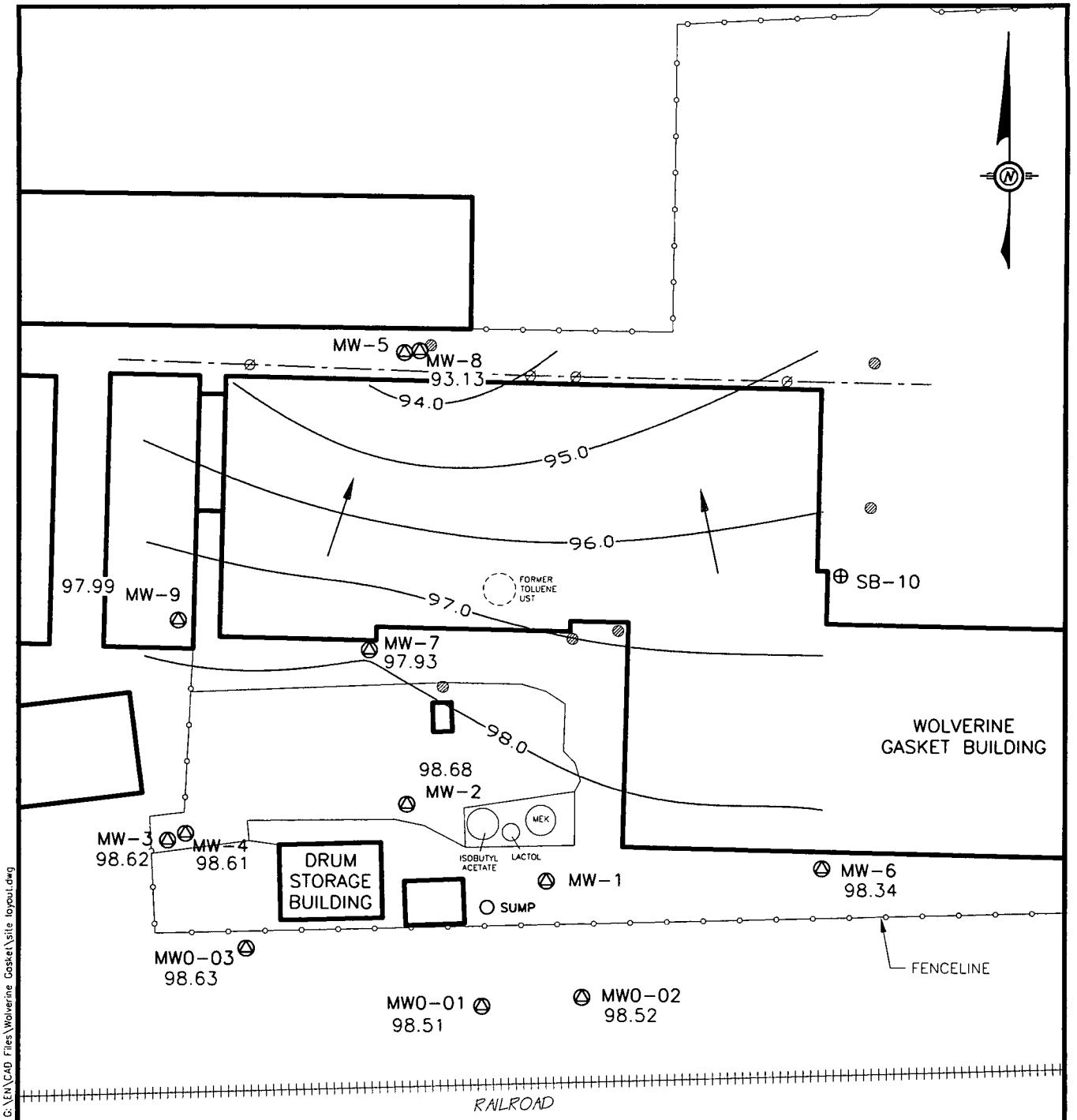


User Name : Trarbrough Date\Time : Thu, 12 Dec 2002 - 1:44pm Path\Name : G:\EN\CAD Files\Wolverine Gasket\site layout.dwg

ARCADIS
25200 TELEGRAPH ROAD
SOUTHFIELD, MICHIGAN 48034
TEL: 248.936.8000
FAX: 248.936.8111

SITE LAYOUT MAP
EAGLE-PICHER
AUTOMOTIVE GROUP
WOLVERINE GASKET DIVISION
INKSTER, MICHIGAN

DATE	PROJECT MANAGER	DRAWING NAME
23-SEP-02	J. QUINNAN	site layout
DRAWN	LEAD DESIGN PROF.	CHECKED
TRY		K. WILSON
PROJECT NUMBER		FIGURE NUMBER
MI000745.0003		2



LEGEND

⊘	MANHOLE
⊕	SOIL BORING
△	MONITORING WELL
97.57	GROUNDWATER ELEVATION
— 98.0 —	GROUNDWATER-ELEVATION CONTOUR
→	GROUNDWATER-FLOW DIRECTION

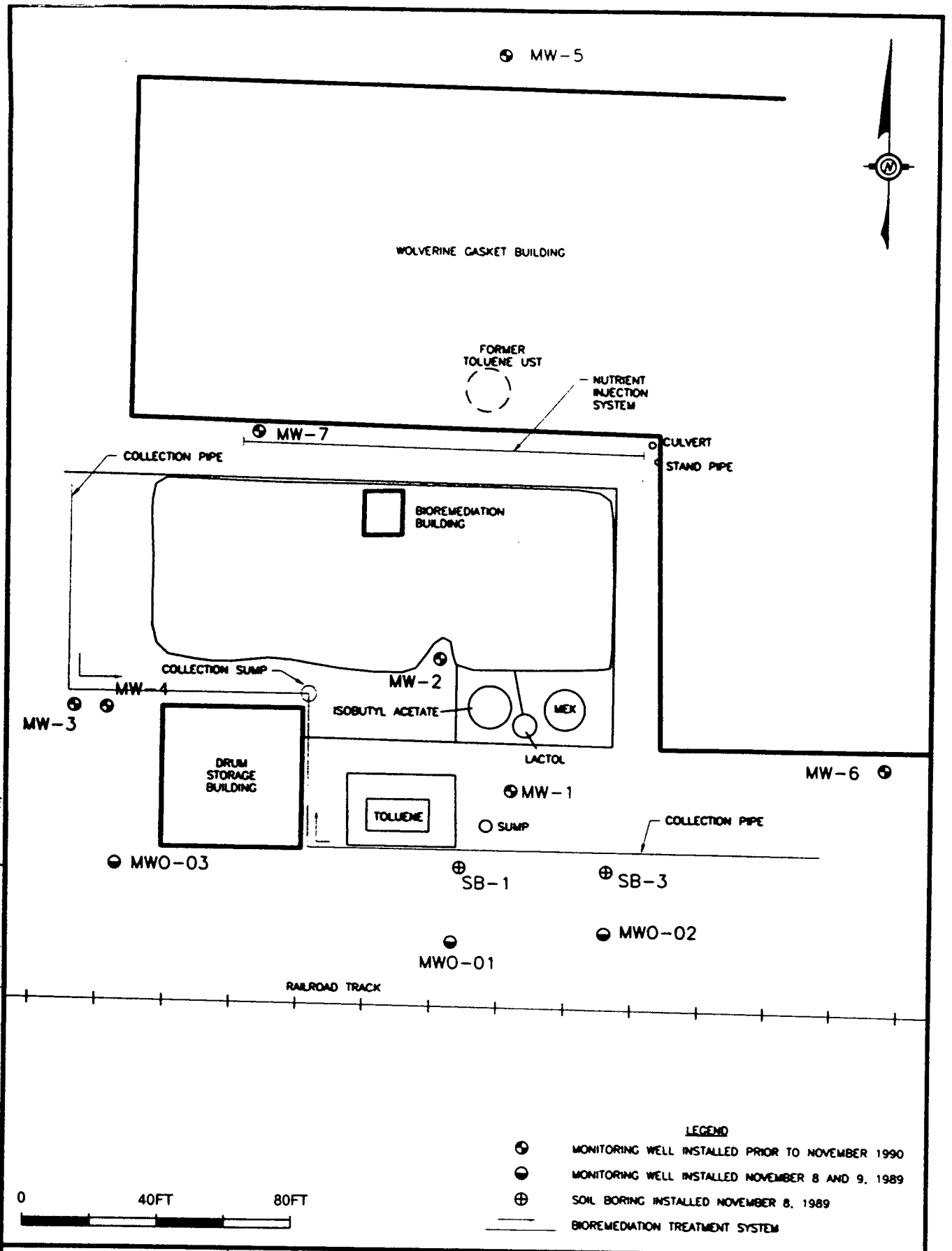
0 60FT 120FT

ARCADIS
25200 TELEGRAPH ROAD
SOUTHFIELD, MICHIGAN 48034
TEL: 248.936.8000
FAX: 248.936.8111

PERCHED GROUNDWATER ELEVATION DECEMBER 12, 2002
EAGLE-PICHER AUTOMOTIVE GROUP
WOLVERINE GASKET DIVISION
INKSTER, MICHIGAN

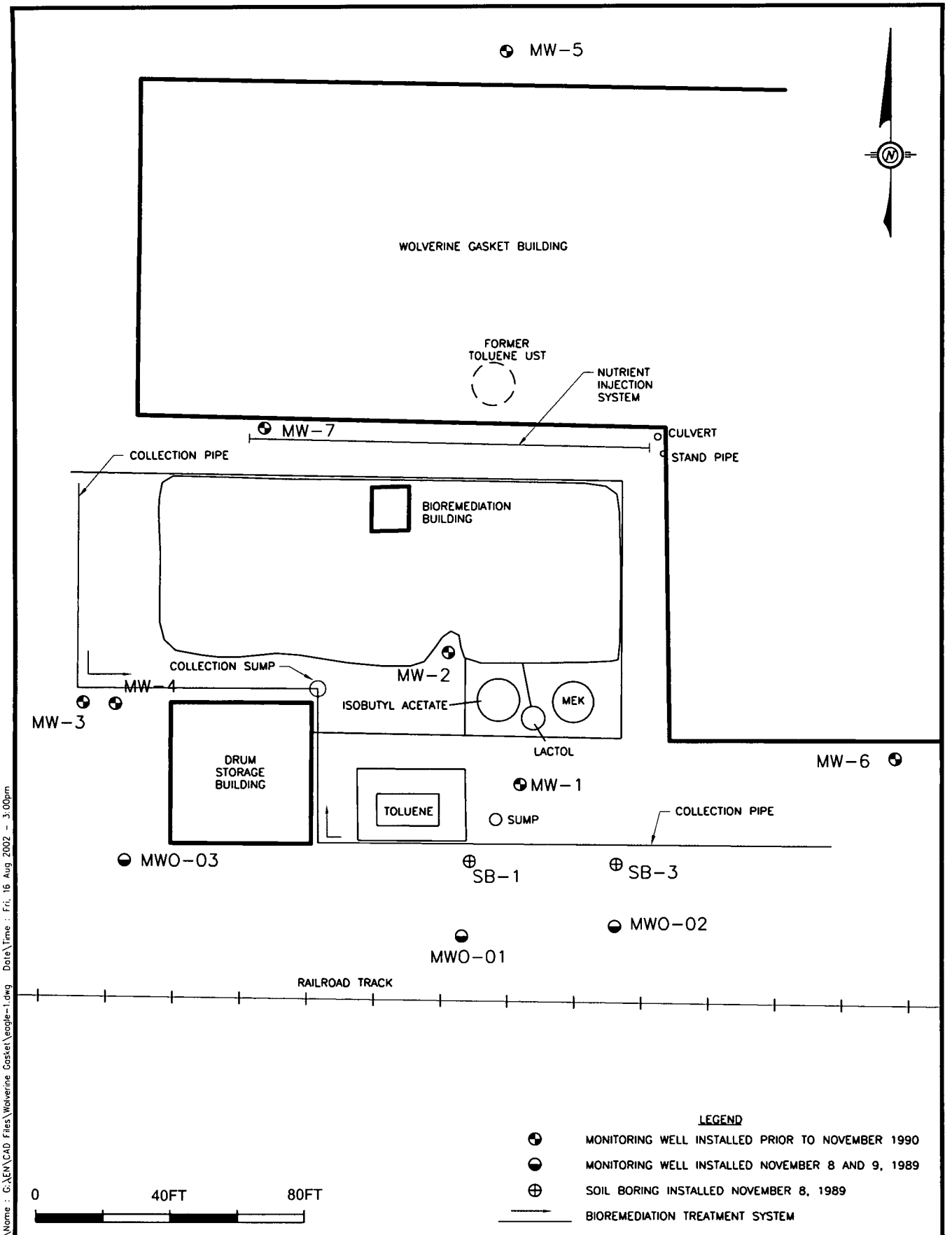
DATE	PROJECT MANAGER	DRAWING NAME
23-OCT-02	J. QUINNAN	site layout
DRAWN	LEAD DESIGN PROF.	CHECKED
TRY		K. WILSON
PROJECT NUMBER		FIGURE NUMBER
MI000745.0003		4

User Name : TYarbrough Date\Time : Thu, 23 Jan 2003 - 8:33am Path\Name : G:\EN\CAD Files\Wolverine Gasket\site layout.dwg



User Name: TYarbrough Path\Name: G:\EN\CAD Files\Wolverine Gasket\eagle-1.dwg Date\Time: Fri, 16 Aug 2002 - 3:00pm

ARCADIS 25200 TELEGRAPH ROAD SOUTHFIELD, MICHIGAN 48034 TEL: 248.936.8444 FAX: 248.936.8445	SITE LAYOUT MAP EAGLE-PICHER AUTOMOTIVE WOLVERINE GASKET DIVISION INKSTER, MICHIGAN	DATE 15-AUG-02 DRAWN TRY PROJECT NUMBER MI000745.0003	PROJECT MANAGER J. QUINNAN LEAD DESIGN PROF. DRAWING NAME eagle-1 CHECKED K. WILSON FIGURE NUMBER 2

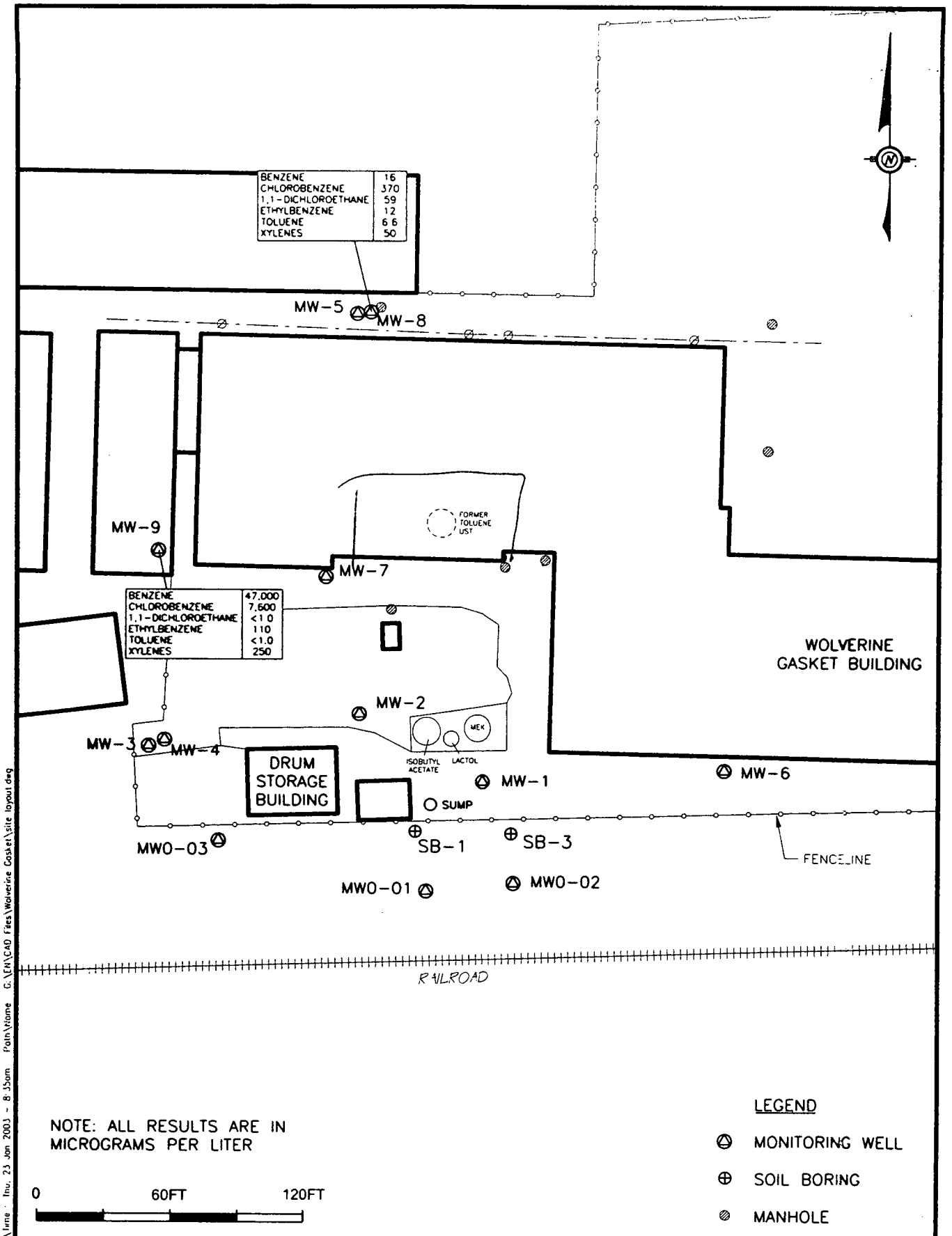


ARCADIS
25200 TELEGRAPH ROAD
SOUTHFIELD, MICHIGAN 48034
TEL: 248.936.8444
FAX: 248.936.8445

SITE LAYOUT MAP
EAGLE-PICHER AUTOMOTIVE
WOLVERINE GASKET DIVISION
INKSTER, MICHIGAN

DATE	PROJECT MANAGER	DRAWING NAME
15-AUG-02	J. QUINNAN	eagle-1
DRAWN TRY	LEAD DESIGN PROF.	CHECKED K WILSON
PROJECT NUMBER		FIGURE NUMBER
MI000745.0003		2

User Name : Tyarbrough Path\Name : G:\EN\CAD Files\Wolverine Gasket\eagle-1.dwg Date\Time : Fri, 16 Aug 2002 - 3:00pm



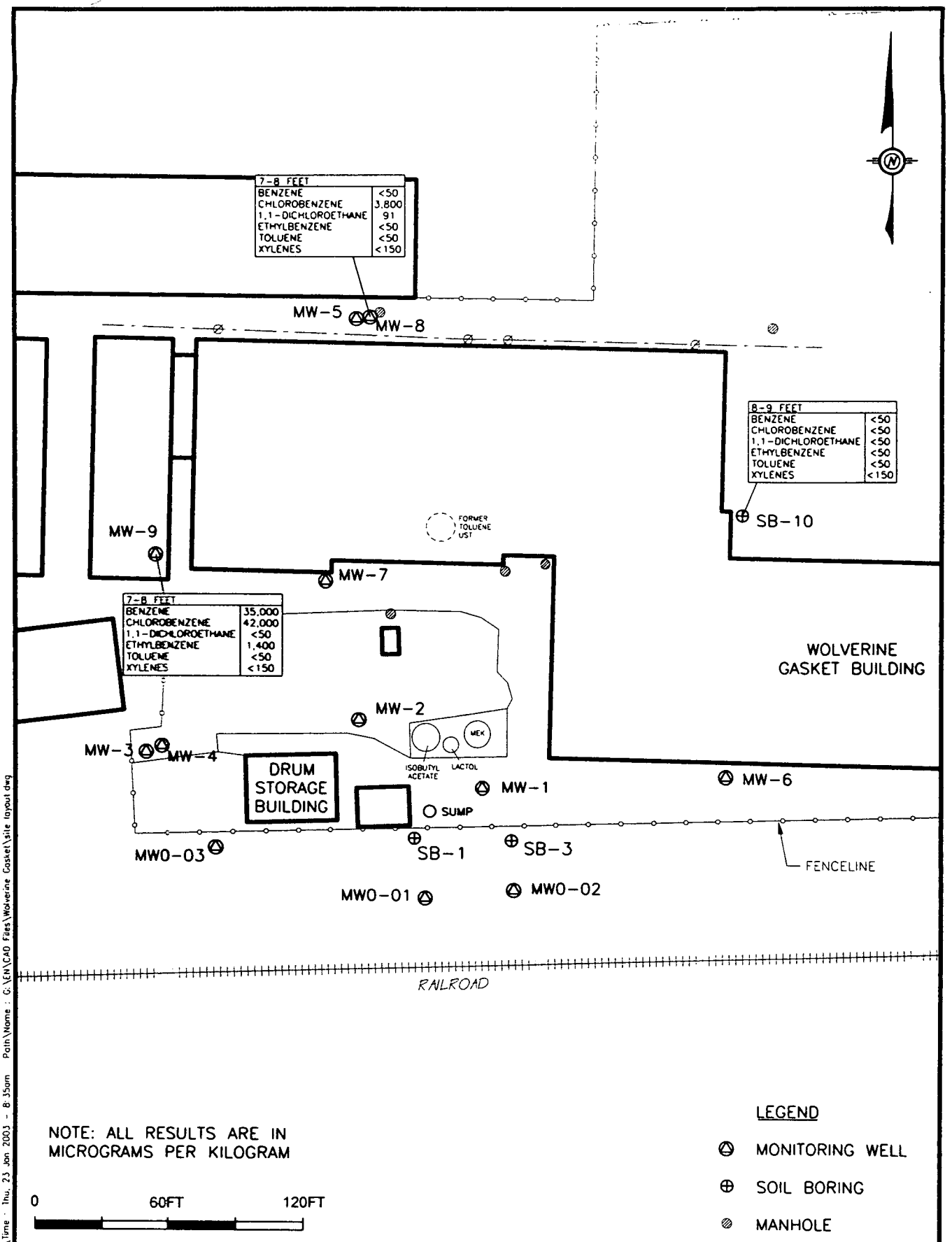
ARCADIS

25200 TELEGRAPH ROAD
SOUTHFIELD, MICHIGAN 48034
TEL: 248.936.8000
FAX: 248.936.8111

GW ANALYTICAL RESULTS
NOVEMBER 11, 2002
EAGLE-PICHER AUTOMOTIVE GROUP
WOLVERINE GASKET DIVISION
INKSTER, MICHIGAN

DATE	PROJECT MANAGER	DRAWING NAME
09-DEC-02	J. QUINNAN	site layout
DRAWN	LEAD DESIGN PROF.	CHECKED
TRY		K. WILSON
PROJECT NUMBER		FIGURE NUMBER
MI000745.0003		6

User Name: TTarbrough Date/Time: Thu, 23 Jan 2003 - 8:35am Path:\Home G:\EN\CAD Files\Wolverine Gasket\site layout.dwg



User Name : TYarbrough Date\Time : Thu, 23 Jan 2003 - 8:35am Path\Name : G:\EN\CAD Files\Wolverine Gasket\site layout.dwg

ARCADIS

25200 TELEGRAPH ROAD
SOUTHFIELD, MICHIGAN 48034
TEL: 248.936.8000
FAX: 248.936.8111

SOIL ANALYTICAL RESULTS
NOVEMBER 11, 2002
EAGLE-PICHER AUTOMOTIVE GROUP
WOLVERINE GASKET DIVISION
INKSTER, MICHIGAN

DATE	PROJECT MANAGER	DRAWING NAME
09-DEC-02	J. QUINNAN	site layout
DRAWN TRY	LEAD DESIGN PROF.	CHECKED K. WILSON
PROJECT NUMBER		FIGURE NUMBER
MI000745.0003		5

MI0012738

CONESTOGA-ROVERS
& ASSOCIATES

December 14, 2004 Reference No. 37248

Mr. Doug Rommeck
EaglePicher Automotive
2638 Princess St.
Inkster, Michigan 48141

Dear Mr. Rommeck:

Re: Soil Removal Summary
EaglePicher Automotive
Wolverine Gasket Division
Inkster, Michigan

Conestoga-Rovers & Associates (CRA) is providing this letter to summarize the activities and results regarding the removal of soil from the soil pile south of the building located at 2638 Princess St. Inkster, Michigan 48141.

SPLP Sampling

CRA collected two composite soil samples from the upper 2-1/2 feet of the soil pile for laboratory analysis of the results from the Synthetic Precipitation Leaching Procedure (SPLP) for Volatile Organic Compounds (VOCs) on September 23, 2004. Each composite sample consisted of 5 hand-auger locations. A total of 10 hand-augured holes were completed. The location of each hand-auger sample point and the corresponding sample identification number can be found in Figure 1. The samples were shipped on ice to Severn Trent Laboratories in North Canton Ohio for analysis. The Final SPLP VOC analytical results are presented in Appendix A. There were no exceedences of RCRA TCLP criteria. Additionally, the results did not exceed Part 201 generic criteria.

Soil Excavation and Removal

The soil excavation began on Monday October 25, 2004. CRA arrived onsite Tuesday, October 26, 2004. Environmental Management Alternatives (EMA) removed approximately 2 to 2-1/2 half feet of soil from the top of the soil pile and stockpiled this soil on-Site to be used as backfill after the excavation was completed. EMA then excavated the remainder of the soil pile to a depth of approximately 2 feet below original grade. The excavated soil was screened for impact using field observations including visual and olfactory observations, Photo Ionization Detector (PID) monitoring, and the results of chlorobenzene specific field tests (Draeger tubes). CRA used historical analytical results (Figure 2) and field observations to assess whether the soil may be hazardous. CRA cross-referenced historical soil analytical results with their corresponding PID readings (Table 1). Based on a review of Table 1 field screening was conducted with a PID.

PID readings that were greater than 700 ppm required further analysis with chlorobenzene specific Draeger tubes if the soil was going to be transported offsite. If field monitoring indicated that high concentrations of cholorobenzene were present, EaglePicher was notified and the highly impacted soils were left in the bottom of the excavation. The field notes relating to the soil removal are presented in Appendix B.

EMA loaded, transported, and disposed of the soil at Michigan Disposal Waste Treatment Facility. EMA then backfilled the open excavation with the stockpiled soil that was obtained from the top 2 to 2-1/2 feet of the original soil pile and the location was graded.

Yours truly,

CONESTOGA-ROVERS & ASSOCIATES

Thomas Kinney

Thomas M. Kinney, CPG

BF/eb/3/Det.

c.c.: Tom Johnson, CRA

FIGURES

MI0012741

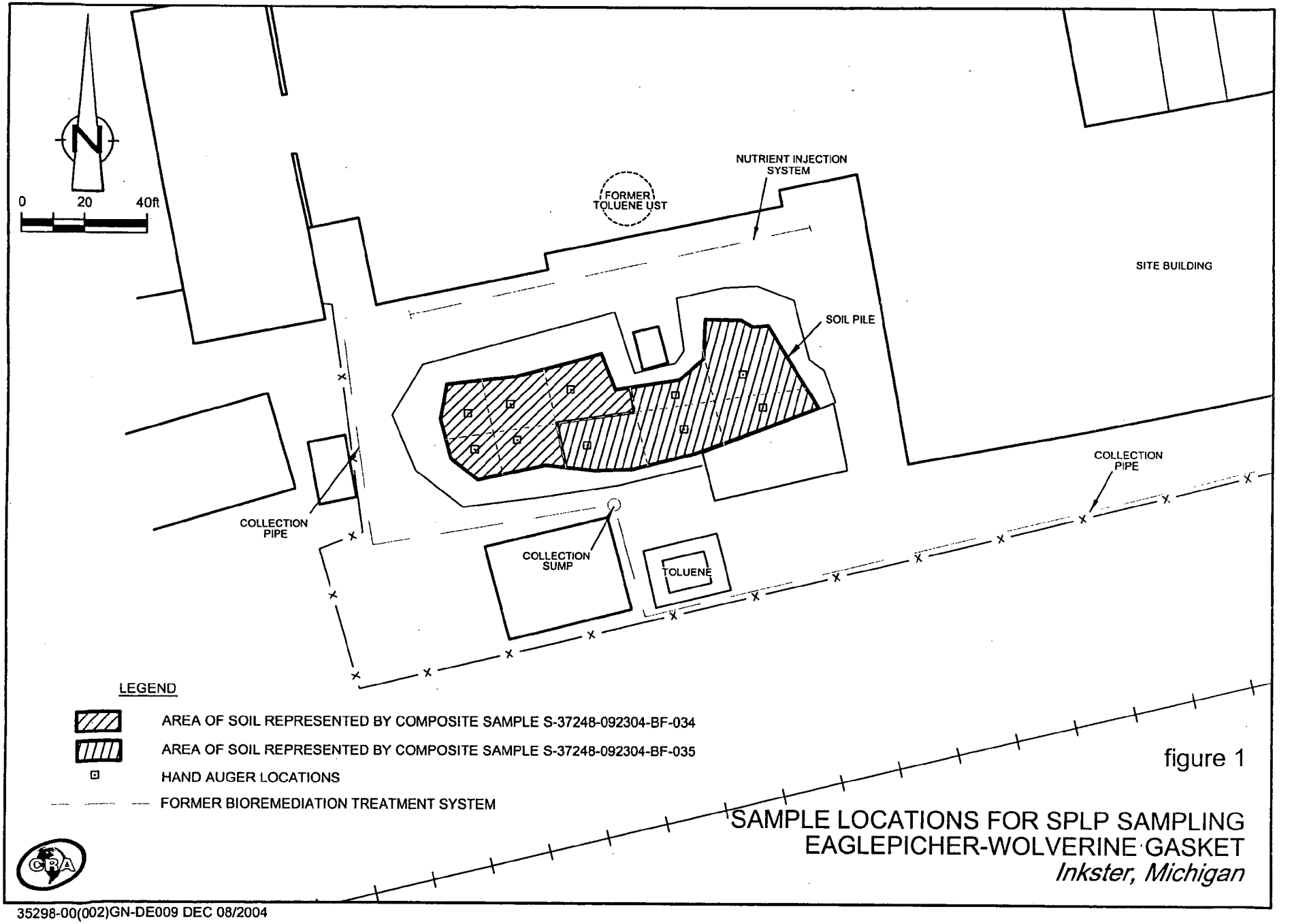
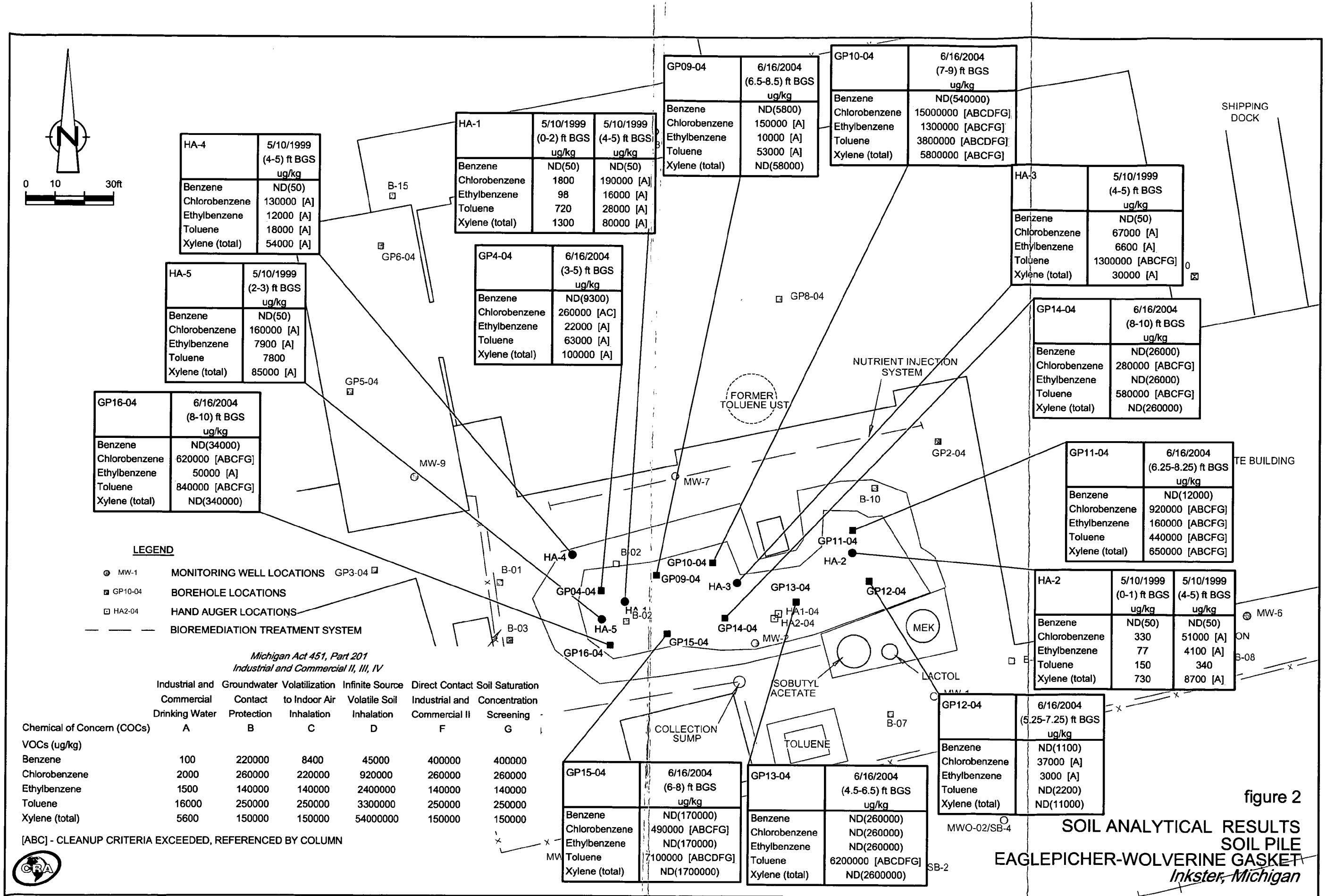


figure 1

SAMPLE LOCATIONS FOR SPLP SAMPLING
EAGLEPICHER-WOLVERINE GASKET
Inkster, Michigan

35298-00(002)GN-DE009 DEC 08/2004

MI0012742


N
0 10 30ft
HA-4 | 5/10/1999 (4-5) ft BGS ug/kg
Benzene ND(50)
Chlorobenzene 130000 [A]
Ethylbenzene 12000 [A]
Toluene 18000 [A]
Xylene (total) 54000 [A]
HA-5 | 5/10/1999 (2-3) ft BGS ug/kg
Benzene ND(50)
Chlorobenzene 160000 [A]
Ethylbenzene 7900 [A]
Toluene 7800
Xylene (total) 85000 [A]
GP16-04 | 6/16/2004 (8-10) ft BGS ug/kg
Benzene ND(34000)
Chlorobenzene 620000 [ABCFG]
Ethylbenzene 50000 [A]
Toluene 840000 [ABCFG]
Xylene (total) ND(340000)
HA-1 | 5/10/1999 (0-2) ft BGS ug/kg | 5/10/1999 (4-5) ft BGS ug/kg
Benzene ND(50) ND(50)
Chlorobenzene 1800 190000 [A]
Ethylbenzene 98 16000 [A]
Toluene 720 28000 [A]
Xylene (total) 1300 80000 [A]
GP4-04 | 6/16/2004 (3-5) ft BGS ug/kg
Benzene ND(9300)
Chlorobenzene 260000 [AC]
Ethylbenzene 22000 [A]
Toluene 63000 [A]
Xylene (total) 100000 [A]
GP09-04 | 6/16/2004 (6.5-8.5) ft BGS ug/kg
Benzene ND(5800)
Chlorobenzene 150000 [A]
Ethylbenzene 10000 [A]
Toluene 53000 [A]
Xylene (total) ND(58000)
GP10-04 | 6/16/2004 (7-9) ft BGS ug/kg
Benzene ND(540000)
Chlorobenzene 15000000 [ABCDFG]
Ethylbenzene 1300000 [ABCFG]
Toluene 3800000 [ABCDFG]
Xylene (total) 5800000 [ABCFG]
HA-3 | 5/10/1999 (4-5) ft BGS ug/kg
Benzene ND(50)
Chlorobenzene 67000 [A]
Ethylbenzene 6600 [A]
Toluene 1300000 [ABCFG]
Xylene (total) 30000 [A]
GP14-04 | 6/16/2004 (8-10) ft BGS ug/kg
Benzene ND(26000)
Chlorobenzene 280000 [ABCFG]
Ethylbenzene ND(26000)
Toluene 580000 [ABCFG]
Xylene (total) ND(260000)
GP11-04 | 6/16/2004 (6.25-8.25) ft BGS ug/kg
Benzene ND(12000)
Chlorobenzene 920000 [ABCFG]
Ethylbenzene 160000 [ABCFG]
Toluene 440000 [ABCFG]
Xylene (total) 650000 [ABCFG]
HA-2 | 5/10/1999 (0-1) ft BGS ug/kg | 5/10/1999 (4-5) ft BGS ug/kg
Benzene ND(50) ND(50)
Chlorobenzene 330 51000 [A]
Ethylbenzene 77 4100 [A]
Toluene 150 340
Xylene (total) 730 8700 [A]
GP12-04 | 6/16/2004 (5.25-7.25) ft BGS ug/kg
Benzene ND(1100)
Chlorobenzene 37000 [A]
Ethylbenzene 3000 [A]
Toluene ND(2200)
Xylene (total) ND(11000)
GP15-04 | 6/16/2004 (6-8) ft BGS ug/kg
Benzene ND(170000)
Chlorobenzene 490000 [ABCFG]
Ethylbenzene ND(170000)
Toluene 7100000 [ABCDFG]
Xylene (total) ND(1700000)
GP13-04 | 6/16/2004 (4.5-6.5) ft BGS ug/kg
Benzene ND(260000)
Chlorobenzene ND(260000)
Ethylbenzene ND(260000)
Toluene 6200000 [ABCDFG]
Xylene (total) ND(2600000)
SHIPPING DOCK
B-15
GP6-04
GP8-04
GP5-04
GP2-04
NUTRIENT INJECTION SYSTEM
FORMER TOLUENE UST
MW-9
MW-7
B-10
GP11-04
HA-2
HA-4
B-02
GP10-04
GP09-04
HA-3
GP13-04
GP12-04
GP3-04
B-01
GP04-04
HA-1
B-02
HA1-04
HA2-04
HA-5
B-03
GP14-04
GP15-04
MW-2
GP16-04
MEK
LACTOL
SOBUTYL ACETATE
COLLECTION SUMP
TOLUENE
B-07
MW-6
B-08
MWO-02/SB-4
SB-2
LEGEND
MW-1 MONITORING WELL LOCATIONS
GP10-04 BOREHOLE LOCATIONS
HA2-04 HAND AUGER LOCATIONS
BIOREMEDIATION TREATMENT SYSTEM
Michigan Act 451, Part 201
Industrial and Commercial II, III, IV
Chemical of Concern (COCs) | Industrial and Commercial Drinking Water A | Groundwater Contact Protection B | Volatilization to Indoor Air Inhalation C | Infinite Source Volatile Soil Inhalation D | Direct Contact Industrial and Commercial II F | Soil Saturation Concentration Screening G
VOCs (ug/kg)
Benzene 100 220000 8400 45000 400000 400000
Chlorobenzene 2000 260000 220000 920000 260000 260000
Ethylbenzene 1500 140000 140000 2400000 140000 140000
Toluene 16000 250000 250000 3300000 250000 250000
Xylene (total) 5600 150000 150000 54000000 150000 150000
[ABC] - CLEANUP CRITERIA EXCEEDED, REFERENCED BY COLUMN
CRA
37248-00(ROMM003)GN-DE001 DEC 10/2004
figure 2
SOIL ANALYTICAL RESULTS
SOIL PILE
EAGLEPICHER-WOLVERINE GASKET
Inkster, Michigan

MI0012743

TABLES

MI0012744

TABLE 1

SUMMARY OF JUNE 2004 SOIL RESULTS
PHOTOIONIZATION DETECTOR READINGS
WOLVERINE GASKET INKSTER FACILITY
INKSTER, MICHIGAN

Sample Location / Sample Depth(ft BGS)	PID [1] (ppm)	Chlorobenzene [2]	Ethylbenzene [2]	Toluene [2]	Xylene (total) [2]
GP4-04 (0-2.5) [3]	0.1				
GP4-04 (2.5-5.0)	26.2				
GP4-04 (3.0-5.0) [4]		260	22	63	100
GP4-04 (5-7.5)	10.1				
GP4-04 (7.5-10.0)	5.7				
GP09-04 (0-2.5)	1.5				
GP09-04 (2.5-5.0)	9.5				
GP09-04 (5-7.5)	24.1				
GP09-04 (6.5-8.5)		150	10	53	ND(58)
GP09-04 (7.5-10.0)	1267				
GP10-04 (0-2.5)	6.8				
GP10-04 (2.5-5.0)	7.2				
GP10-04 (5-7.5)	712				
GP10-04 (7.0-9.0)		15000	1300	3800	5800
GP10-04 (7.5-10.0)	1105				
GP11-04 (0-2.5)	2.3				
GP11-04 (2.5-5.0)	51.7				
GP11-04 (5-7.5)	57				
GP11-04 (6.25-8.25)		920	160	440	650
GP11-04 (7.5-10.0)	1000				
GP12-04 (0-2.5)	1.4				
GP12-04 (2.5-5.0)	3.1				
GP12-04 (5-7.5)	109				
GP12-04 (5.25-7.25)		37	3	ND(2.2)	ND(11)
GP12-04 (7.5-10.0)	18.7				
GP13-04 (0-2.5)	3.0				
GP13-04 (2.5-5.0)	1256				
GP13-04 (4.5-6.5)		ND(260)	ND(260)	6200	ND(2600)
GP13-04 (5-7.5)	1275				
GP13-04 (7.5-10.0)	308				
GP14-04 (0-2.5)	2.7				
GP14-04 (2.5-5.0)	29.6				
GP14-04 (5-7.5)	40.2				
GP14-04 (7.5-10.0)	396				
GP14-04 (8.0-10.0)		280	ND(26)	580	ND(260)
GP15-04 (0-2.5)	2.7				
GP15-04 (2.5-5.0)	25.4				
GP15-04 (5.0-7.5)	1416				
GP15-04 (6.0-8.0)		490	ND (170)	7100	ND(1700)
GP15-04 (7.5-10.0)	408				
GP16-04 (0-2.5)	4.2				
GP16-04 (2.5-5.0)	5.4				
GP16-04 (5-7.5)	42.6				
GP16-04 (7.5-10.0)	466				
GP16-04 (8.0-10.0)		620	50	840	ND(340)

Notes:
[1] PID - Photoionization Detector, results in parts per million
[2] Analytical Laboratory Results, results in milligrams/kilograms (mg/kg)

APPENDICES

A

MI0012747

APPENDIX A

ANALYTICAL REPORT

MI0012748

SEVERN TRENT STL

STL North Canton
4101 Shuffel Drive NW
North Canton, OH 44720

Tel: 330 497 9396 Fax: 330 497 0772
www.stl-inc.com

ANALYTICAL REPORT

PROJECT NO. 37248

EAGLE PICHER/WOLVERINE GASKET

Lot #: A4I240399

Paul Wiseman

Conestoga Rovers & Assoc., Inc
14496 Sheldon Rd Suite 200
Plymouth, MI 48170

SEVERN TRENT LABORATORIES, INC.

Kenneth J. Kuzior
Project Manager

October 19, 2004

CASE NARRATIVE

A4I240399

The following report contains the analytical results for two solid samples submitted to STL North Canton by Conestoga-Rovers & Associates, Inc. from the Eagle Picher/Wolverine Gasket Site, project number 37248. The samples were received September 24, 2004, according to documented sample acceptance procedures.

STL utilizes USEPA approved methods in all analytical work. The samples presented in this report were analyzed for the parameter(s) listed on the analytical methods summary page in accordance with the method(s) indicated. Preliminary results were provided to Chemistry Department on October 08, 2004. A summary of QC data for these analyses is included at the back of the report.

STL North Canton attests to the validity of the laboratory data generated by STL facilities reported herein. All analyses performed by STL facilities were done using established laboratory SOPs that incorporate QA/QC procedures described in the applicable methods. STL's operations groups have reviewed the data for compliance with the laboratory QA/QC plan, and data have been found to be compliant with laboratory protocols unless otherwise noted below.

All solid sample results are reported on an "as received" basis unless otherwise indicated by a dry weight adjustment footnote at the bottom of the analytical report page. The list of parameters which are never reported on a dry weight basis is included on the Sample Summary.

The test results in this report meet all NELAP requirements for parameters for which accreditation is required or available. Any exceptions to NELAP requirements are noted in this report. Pursuant to NELAP, this report may not be reproduced, except in full, without the written approval of the laboratory.

If you have any questions, please call the Project Manager, Kenneth J. Kuzior, at 330-497-9396.

This report is sequentially paginated. The final page of the report is labeled as "END OF REPORT."

CASE NARRATIVE (continued)

SUPPLEMENTAL QC INFORMATION

SAMPLE RECEIVING

The temperature of the cooler upon sample receipt was 5.8°C.

See STL's Cooler Receipt Form for additional information.

GC/MS VOLATILES

The analytical results met the requirements of the laboratory's QA/QC program.

GENERAL CHEMISTRY

The analytical results met the requirements of the laboratory's QA/QC program.

QUALITY CONTROL ELEMENTS OF SW-846 METHODS

STL North Canton conducts a quality assurance/quality control (QA/QC) program designed to provide scientifically valid and legally defensible data. Toward this end, several types of quality control indicators are incorporated into the QA/QC program, which is described in detail in QA Policy, QA-003. These indicators are introduced into the sample testing process to provide a mechanism for the assessment of the analytical data.

QC BATCH

Environmental samples are taken through the testing process in groups called QUALITY CONTROL BATCHES (QC batches). A QC batch contains up to twenty environmental samples of a similar matrix (water, soil) that are processed using the same reagents and standards. STL North Canton requires that each environmental sample be associated with a QC batch.

Several quality control samples are included in each QC batch and are processed identically to the twenty environmental samples. These QC samples include a METHOD BLANK (MB), a LABORATORY CONTROL SAMPLE (LCS) and, where appropriate, a MATRIX SPIKE/MATRIX SPIKE DUPLICATE (MS/MSD) pair or a MATRIX SPIKE/SAMPLE DUPLICATE (MS/DU) pair. If there is insufficient sample to perform an MS/MSD or an MS/DU, then a LABORATORY CONTROL SAMPLE DUPLICATE (LCSD) is included in the QC batch.

LABORATORY CONTROL SAMPLE

The Laboratory Control Sample is a QC sample that is created by adding known concentrations of a full or partial set of target analytes to a matrix similar to that of the environmental samples in the QC batch. The LCS analyte recovery results are used to monitor the analytical process and provide evidence that the laboratory is performing the method within acceptable guidelines. All control analytes indicated by a bold type in the LCS must meet acceptance criteria. Failure to meet the established recovery guidelines requires the repreparation and reanalysis of all samples in the QC batch. The only exception is that if the LCS recoveries are biased high and the associated sample is ND (non-detected) for the parameter(s) of interest, the batch is acceptable.

At times, a Laboratory Control Sample Duplicate (LCSD) is also included in the QC batch. An LCSD is a QC sample that is created and handled identically to the LCS. Analyte recovery data from the LCSD is assessed in the same way as that of the LCS. The LCSD recoveries, together with the LCS recoveries, are used to determine the reproducibility (precision) of the analytical system. Precision data are expressed as relative percent differences (RPDs). If the RPD fails for an LCS/LCSD and yet the recoveries are within acceptance criteria, the batch is still acceptable.

METHOD BLANK

The Method Blank is a QC sample consisting of all the reagents used in analyzing the environmental samples contained in the QC batch. Method Blank results are used to determine if interference or contamination in the analytical system could lead to the reporting of false positive data or elevated analyte concentrations. All target analytes must be below the reporting limits (RL) or the associated sample(s) must be ND except under the following circumstances:

- Common organic contaminants may be present at concentrations up to 5 times the reporting limits. Common metals contaminants may be present at concentrations up to 2 times the reporting limit, or the reported blank concentration must be twenty fold less than the concentration reported in the associated environmental samples. (See common laboratory contaminants listed below.)

Volatile (GC or GC/MS)	Semivolatile (GC/MS)	Metals
Methylene chloride	Phthalate Esters	Copper
Acetone		Iron
2-Butanone		Zinc
		Lead*

- *for analyses run on TJA Trace ICP, ICPMS or GFAA only*

QUALITY CONTROL ELEMENTS OF SW-846 METHODS
(Continued)

- Organic blanks will be accepted if compounds detected in the blank are present in the associated samples at levels 10 times the blank level. Inorganic blanks will be accepted if elements detected in the blank are present in the associated samples at 20 times the blank level.

- Blanks will be accepted if the compounds/elements detected are not present in any of the associated environmental samples.

Failure to meet these Method Blank criteria requires the repreparation and reanalysis of all samples in the QC batch.

MATRIX SPIKE/MATRIX SPIKE DUPLICATE

A Matrix Spike and a Matrix Spike Duplicate are a pair of environmental samples to which known concentrations of a full or partial set of target analytes are added. The MS/MSD results are determined in the same manner as the results of the environmental sample used to prepare the MS/MSD. The analyte recoveries and the relative percent differences (RPDs) of the recoveries are calculated and used to evaluate the effect of the sample matrix on the analytical results. Due to the potential variability of the matrix of each sample, the MS/MSD results may not have an immediate bearing on any samples except the one spiked; therefore, the associated batch MS/MSD may not reflect the same compounds as the samples contained in the analytical report. When these MS/MSD results fail to meet acceptance criteria, the data is evaluated. If the LCS is within acceptance criteria, the batch is considered acceptable. The acceptance criteria do not apply to samples that are diluted for organics if the native sample amount is 4x the concentration of the spike.

For certain methods, a Matrix Spike/Sample Duplicate (MS/DU) may be included in the QC batch in place of the MS/MSD. For the parameters (i.e. pH, ignitability) where it is not possible to prepare a spiked sample, a Sample Duplicate may be included in the QC batch. However, a Sample Duplicate is less likely to provide usable precision statistics depending on the likelihood of finding concentrations below the standard reporting limit. When the Sample Duplicate result fails to meet acceptance criteria, the data is evaluated.

SURROGATE COMPOUNDS

In addition to these batch-related QC indicators, each organic environmental and QC sample is spiked with surrogate compounds. Surrogates are organic chemicals that behave similarly to the analytes of interest and that are rarely present in the environment. Surrogate recoveries are used to monitor the individual performance of a sample in the analytical system.

If surrogate recoveries are biased high in the LCS, LCSD, or the Method Blank, and the associated sample(s) are ND, the batch is acceptable. Otherwise, if the LCS, LCSD, or Method Blank surrogate(s) fail to meet recovery criteria, the entire sample batch is reprepped and reanalyzed. If the surrogate recoveries are outside criteria for environmental samples, the samples will be reprepped and reanalyzed unless there is objective evidence of matrix interference or if the sample dilution is greater than the threshold outlined in the associated method SOP.

For the GC/MS BNA methods, the surrogate criterion is that two of the three surrogates for each fraction must meet acceptance criteria. The third surrogate must have a recovery of ten percent or greater.

For the Pesticide, PCB, and PAH methods, the surrogate criterion is that one of two surrogate compounds must meet acceptance criteria.

STL North Canton Certifications and Approvals:

Alabama (#41170), California (#01144CA), Connecticut (#PH-0590), Florida (#E87225), Illinois (#100439), Kansas (#E10336), Massachusetts (#M-OH048), Maryland (#272), Minnesota (#39-999-348), New Jersey (#OH001), New York (#10975), Ohio (#6090), OhioVAP (#CL0024), Rhode Island (#237), South Carolina (#92007001, #92007002, #92007003), Tennessee (#02903), Utah (#QUAN9), Virginia (#00011), West Virginia (#210), Wisconsin (#999518190),NAVY, ARMY, USDA Soil Permit, ACIL Seal of Excellence – Participating Lab Status Award (#82)

Y:\HerrenD\FORMS\New exp inserts\sw846 2-2-04.doc, Revised: 01/28/04 DJL

EXECUTIVE SUMMARY - Detection Highlights

A4I240399

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD
S-37248-092304-BF-034 09/23/04 10:20	**001**			
Percent Solids	91.9	10.0	%	MCAWW 160.3 MOD
S-37248-092304-BF-035 09/23/04 10:40	**002**			
Chlorobenzene	1.5	1.0	ug/L	SW846 8260B
Percent Solids	91.4	10.0	%	MCAWW 160.3 MOD

ANALYTICAL METHODS SUMMARY

A4I240399

PARAMETER	ANALYTICAL METHOD
Total Residue as Percent Solids	MCAWW 160.3 MOD
Volatile Organics by GC/MS	SW846 8260B

References:

MCAWW "Methods for Chemical Analysis of Water and Wastes", EPA-600/4-79-020, March 1983 and subsequent revisions.

SW846 "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods", Third Edition, November 1986 and its updates.

SAMPLE SUMMARY

A4I240399

WO #	SAMPLE#	CLIENT SAMPLE ID	SAMPLED DATE	SAMP TIME
GQ448	001	S-37248-092304-BF-034	09/23/04	10:20
GQ46J	002	S-37248-092304-BF-035	09/23/04	10:40

NOTE(S):

- The analytical results of the samples listed above are presented on the following pages.
- All calculations are performed before rounding to avoid round-off errors in calculated results.
- Results noted as "ND" were not detected at or above the stated limit.
- This report must not be reproduced, except in full, without the written approval of the laboratory.
- Results for the following parameters are never reported on a dry weight basis: color, corrosivity, density, flashpoint, ignitability, layers, odor, paint filter test, pH, porosity pressure, reactivity, redox potential, specific gravity, spot tests, solids, solubility, temperature, viscosity, and weight.

Conestoga-Rovers & Associates, Inc.

Client Sample ID: S-37248-092304-BF-034

SPLP GC/MS Volatiles

Lot-Sample #...:	A4I240399-001	Work Order #...:	GQ4482AD	Matrix.....:	SO
Date Sampled...:	09/23/04 10:20	Date Received..:	09/24/04		
Leach Date.....:	10/05/04	Prep Date.....:	10/07/04	Analysis Date..:	10/07/04
Leach Batch #..:	P428002	Prep Batch #...:	4282216		
Dilution Factor:	1				
% Moisture.....:	8.1	Method.....:	SW846 8260B		

PARAMETER	RESULT	REPORTING LIMIT	UNITS
Benzene	ND	1.0	ug/L
Carbon tetrachloride	ND	1.0	ug/L
Chlorobenzene	ND	1.0	ug/L
Chloroform	ND	1.0	ug/L
1,2-Dichloroethane	ND	1.0	ug/L
1,1-Dichloroethylene	ND	1.0	ug/L
Methyl ethyl ketone	ND	10	ug/L
Tetrachloroethylene	ND	1.0	ug/L
Trichloroethylene	ND	1.0	ug/L
Vinyl chloride	ND	1.0	ug/L

SURROGATE	PERCENT RECOVERY	RECOVERY LIMITS
Dibromofluoromethane	100	(59 - 138)
1,2-Dichloroethane-d4	110	(61 - 130)
Toluene-d8	98	(60 - 143)
4-Bromofluorobenzene	82	(47 - 158)

NOTE(S):

Analysis performed in accordance with USEPA Synthetic Precipitation Leaching Procedure Method 1312

Conestoga-Rovers & Associates, Inc.

Client Sample ID: S-37248-092304-BF-035

SPLP GC/MS Volatiles

Lot-Sample #...:	A4I240399-002	Work Order #...:	GQ46J2AD	Matrix.....:	SO
Date Sampled...:	09/23/04 10:40	Date Received..:	09/24/04		
Leach Date.....:	10/05/04	Prep Date.....:	10/07/04	Analysis Date..:	10/07/04
Leach Batch #..:	P428002	Prep Batch #...:	4282216		
Dilution Factor:	1				
% Moisture.....:	8.6	Method.....:	SW846 8260B		

PARAMETER	RESULT	REPORTING LIMIT	UNITS
Benzene	ND	1.0	ug/L
Carbon tetrachloride	ND	1.0	ug/L
Chlorobenzene	**1.5**	**1.0**	**ug/L**
Chloroform	ND	1.0	ug/L
1,2-Dichloroethane	ND	1.0	ug/L
1,1-Dichloroethylene	ND	1.0	ug/L
Methyl ethyl ketone	ND	10	ug/L
Tetrachloroethylene	ND	1.0	ug/L
Trichloroethylene	ND	1.0	ug/L
Vinyl chloride	ND	1.0	ug/L

SURROGATE	PERCENT RECOVERY	RECOVERY LIMITS
Dibromofluoromethane	104	(59 - 138)
1,2-Dichloroethane-d4	110	(61 - 130)
Toluene-d8	95	(60 - 143)
4-Bromofluorobenzene	90	(47 - 158)

NOTE(S):

Analysis performed in accordance with USEPA Synthetic Precipitation Leaching Procedure Method 1312

Conestoga-Rovers & Associates, Inc.

Client Sample ID: S-37248-092304-BF-034

General Chemistry

Lot-Sample #...: A4I240399-001 Work Order #...: GQ448 Matrix.....: SO
Date Sampled...: 09/23/04 10:20 Date Received..: 09/24/04
% Moisture.....: 8.1

PARAMETER	RESULT	RL	UNITS	METHOD	PREPARATION-ANALYSIS DATE	PREP BATCH #
Percent Solids	91.9	10.0	%	MCAWW 160.3 MOD	09/27-09/28/04	4271516

Dilution Factor: 1

MI0012759

Conestoga-Rovers & Associates, Inc.

Client Sample ID: S-37248-092304-BF-035

General Chemistry

Lot-Sample #...: A4I240399-002 Work Order #...: GQ46J Matrix.....: SO
Date Sampled...: 09/23/04 10:40 Date Received..: 09/24/04
% Moisture.....: 8.6

PARAMETER	RESULT	RL	UNITS	METHOD	PREPARATION-ANALYSIS DATE	PREP BATCH #
Percent Solids	91.4	10.0	%	MCAWW 160.3 MOD	09/27-09/28/04	4271516

Dilution Factor: 1

SEVERN TRENT STL

QUALITY CONTROL SECTION

MI0012761

METHOD BLANK REPORT

SPLP GC/MS Volatiles

Client Lot #...: A4I240399
MB Lot-Sample #: A4J060000-045
Leach Date.....: 10/05/04
Leach Batch #..: P428002
Dilution Factor: 1

Work Order #...: GRWTR1AA
Prep Date.....: 10/07/04
Prep Batch #...: 4282216

Matrix.....: SOLID
Analysis Date..: 10/07/04

PARAMETER	RESULT	REPORTING LIMIT	UNITS	METHOD
Benzene	ND	1.0	ug/L	SW846 8260B
Carbon tetrachloride	ND	1.0	ug/L	SW846 8260B
Chlorobenzene	ND	1.0	ug/L	SW846 8260B
Chloroform	ND	1.0	ug/L	SW846 8260B
1,2-Dichloroethane	ND	1.0	ug/L	SW846 8260B
1,1-Dichloroethylene	ND	1.0	ug/L	SW846 8260B
Methyl ethyl ketone	ND	10	ug/L	SW846 8260B
Tetrachloroethylene	ND	1.0	ug/L	SW846 8260B
Trichloroethylene	ND	1.0	ug/L	SW846 8260B
Vinyl chloride	ND	1.0	ug/L	SW846 8260B

SURROGATE	PERCENT RECOVERY	RECOVERY LIMITS
Dibromofluoromethane	97	(59 - 138)
1,2-Dichloroethane-d4	107	(61 - 130)
Toluene-d8	97	(60 - 143)
4-Bromofluorobenzene	91	(47 - 158)

NOTE(S):

Calculations are performed before rounding to avoid round-off errors in calculated results.

MI0012762

LABORATORY CONTROL SAMPLE DATA REPORT

GC/MS Volatiles

Client Lot #...: A4I240399 Work Order #...: GR5X11AA-LCS Matrix.....: SOLID
LCS Lot-Sample#: A4J080000-216 GR5X11AC-LCSD
Prep Date.....: 10/07/04 Analysis Date..: 10/07/04
Prep Batch #...: 4282216
Dilution Factor: 1

PARAMETER	SPIKE AMOUNT	MEASURED AMOUNT	UNITS	PERCENT RECOVERY	RPD	METHOD
Benzene	10	9.8	ug/L	98		SW846 8260B
	10	9.9	ug/L	99	1.7	SW846 8260B
Chlorobenzene	10	10	ug/L	101		SW846 8260B
	10	10	ug/L	102	1.2	SW846 8260B
1,1-Dichloroethylene	10	9.7	ug/L	97		SW846 8260B
	10	9.9	ug/L	99	2.3	SW846 8260B
Trichloroethylene	10	10	ug/L	101		SW846 8260B
	10	10	ug/L	104	3.1	SW846 8260B
Toluene	10	10	ug/L	100		SW846 8260B
	10	10	ug/L	104	3.2	SW846 8260B

SURROGATE	PERCENT RECOVERY	RECOVERY LIMITS
Dibromofluoromethane	95	(59 - 138)
	98	(59 - 138)
1,2-Dichloroethane-d4	104	(61 - 130)
	107	(61 - 130)
Toluene-d8	101	(60 - 143)
	104	(60 - 143)
4-Bromofluorobenzene	109	(47 - 158)
	109	(47 - 158)

NOTE(S):

Calculations are performed before rounding to avoid round-off errors in calculated results.

Bold print denotes control parameters

MI0012763

LABORATORY CONTROL SAMPLE EVALUATION REPORT

GC/MS Volatiles

Client Lot #...: A4I240399 Work Order #...: GR5X11AA-LCS Matrix.....: SOLID
LCS Lot-Sample#: A4J080000-216 GR5X11AC-LCSD
Prep Date.....: 10/07/04 Analysis Date..: 10/07/04
Prep Batch #...: 4282216
Dilution Factor: 1

PARAMETER	PERCENT RECOVERY	RECOVERY LIMITS	RPD	RPD LIMITS	METHOD
Benzene	98	(75 - 129)			SW846 8260B
	99	(75 - 129)	1.7	(0-20)	SW846 8260B
Chlorobenzene	101	(75 - 127)			SW846 8260B
	102	(75 - 127)	1.2	(0-22)	SW846 8260B
1,1-Dichloroethylene	97	(55 - 142)			SW846 8260B
	99	(55 - 142)	2.3	(0-27)	SW846 8260B
Trichloroethylene	101	(70 - 131)			SW846 8260B
	104	(70 - 131)	3.1	(0-23)	SW846 8260B
Toluene	100	(71 - 130)			SW846 8260B
	104	(71 - 130)	3.2	(0-24)	SW846 8260B

SURROGATE	PERCENT RECOVERY	RECOVERY LIMITS
Dibromofluoromethane	95	(59 - 138)
	98	(59 - 138)
1,2-Dichloroethane-d4	104	(61 - 130)
	107	(61 - 130)
Toluene-d8	101	(60 - 143)
	104	(60 - 143)
4-Bromofluorobenzene	109	(47 - 158)
	109	(47 - 158)

NOTE(S):

Calculations are performed before rounding to avoid round-off errors in calculated results.

Bold print denotes control parameters

MI0012764

METHOD BLANK REPORT

General Chemistry

Client Lot #...: A4I240399 Matrix.....: SOLID

PARAMETER	RESULT	REPORTING LIMIT	UNITS	METHOD	PREPARATION-ANALYSIS DATE	PREP BATCH #
Percent Solids		Work Order #: GQ79Q1AA		MB Lot-Sample #:	A4I270000-516	
	ND	10.0	%	MCAWW 160.3 MOD	09/27-09/28/04	4271516
		Dilution Factor: 1				

NOTE(S):

Calculations are performed before rounding to avoid round-off errors in calculated results.

MI0012765

SAMPLE DUPLICATE EVALUATION REPORT

General Chemistry

Client Lot #...: A4I240399 Work Order #...: GQ6TV-SMP Matrix.....: SOLID
GQ6TV-DUP

Date Sampled...: 09/24/04 Date Received..: 09/25/04

% Moisture.....: 10

PARAM	RESULT	DUPLICATE RESULT	UNITS	RPD	RPD LIMIT	METHOD	PREPARATION-ANALYSIS DATE	PREP BATCH #
						SD Lot-Sample #: A4I270149-001		
Percent Solids								
	89.7	91.5	%	1.9	(0-20)	MCAWW 160.3 MOD	09/27-09/28/04	4271516

Dilution Factor: 1

MI0012766

Cooler! 341 Page 1 of 1

CRA

CONESTOGA-ROVERS & ASSOCIATES, INC.
14496 Sheldon Road, Suite 200
Plymouth, MI 48170 • (734) 453-5123

CHAIN OF CUSTODY RECORD

SHIPPED TO (Laboratory Name): STL N Canton

REFERENCE NUMBER: 37248

PROJECT NAME: EaglePicher

SAMPLER'S SIGNATURE: [signature] PRINTED NAME: Ben Fruchey

SEQ. No.	DATE	TIME		SAMPLE TYPE	No. OF CONTAINERS	SPLP	VOCs	Dry wt.	2 week TAT							REMARKS
1	9-23-04	1020	S-37248-092304-BF034	Soil	2	X	X		X							
2	9-23-04	1040	S "	-035	Soil	2	X	X		X							CRA Contact Kathy Shaw
			BCF													
TOTAL NUMBER OF CONTAINERS					4											

RELINQUISHED BY:	DATE/TIME	RECEIVED BY:	DATE/TIME
1. [signature]	DATE: 9-23-04 TIME: 1200	1.	DATE: TIME:
2.	DATE: TIME:	2.	DATE: TIME:
3.	DATE: TIME:	1.	DATE: TIME:

METHOD OF SHIPMENT: FED EX AIR BILL No. 6741 0644 5885

White -Fully Executed Copy Pink -Shipper Copy
Yellow -Receiving Laboratory Copy Goldenrod -Sampler Copy

26661

SAMPLE TEAM: Ben Fruchey

RECEIVED FOR LABORATORY BY: [signature]
DATE: 9-24-04 TIME: ~~9:24~~ 0930

1001 (FORMS)-APRIL 29, 93-REV.0-(C)(F-01)

STL North Canton

STL Cooler Receipt Form/Narrative **Lot Number:** A4I240399
North Canton Facility

Client: CRA Project: Eagle Picher Quote#: _____
Cooler Received on: 9-24-04 Opened on: 9-24-04 by: _____ (Signature)

Fedx ☒ Client Drop Off ☐ UPS ☐ DHL ☐ FAS ☐ Other: _____
STL Cooler No# M341 Foam Box ☐ Client Cooler ☐ Other ____

1. Were custody seals on the outside of the cooler? Yes ☐ No ☒ Intact? Yes ☐ No ☐ NA ☒
   If YES, Quantity —
   Were the custody seals signed and dated? Yes ☐ No ☐ NA ☒
2. Shipper's packing slip attached to this form? Yes ☒ No ☐ NA ☐
3. Did custody papers accompany the samples? Yes ☒ No ☐ Relinquished by client? Yes ☒ No ☐
4. Did you sign the custody papers in the appropriate place? Yes ☒ No ☐
5. Packing material used: Bubble Wrap ☒ Foam ☒ None ☐ Other: _____
6. Cooler temperature upon receipt 5-8 °C (see back of form for multiple coolers/temp)

METHOD: Temp Vial ☐ Coolant & Sample ☒ Against Bottles ☐ IR ☐ ICE/H_2O Slurry ☐
COOLANT: Wet Ice ☒ Blue Ice ☐ Dry Ice ☐ Water ☐ None ☐

7. Did all bottles arrive in good condition (Unbroken)? Yes ☒ No ☐
8. Could all bottle labels and/or tags be reconciled with the COC? Yes ☒ No ☐
9. Were samples at the correct pH? (record below/on back) Yes ☐ No ☐ NA ☒
10. Were correct bottles used for the tests indicated? Yes ☒ No ☐
11. Were air bubbles >6 mm in any VOA vials? Yes ☐ No ☐ NA ☒
12. Sufficient quantity received to perform indicated analyses? Yes ☒ No ☐

Contacted PM _____ Date: _____ by: _____ via Voice Mail ☐ Verbal ☐ Other ☐
Concerning: _____

√

1. CHAIN OF CUSTODY

The following discrepancies occurred:
COC = S-37248-092304-BF-034; labels = #034 } will
-035; labels = #035 } log pkl
Cod encore's w/ samples - archive each COC
encore - per KJK

2. SAMPLE CONDITION

Sample(s) _____ were received after the recommended holding time had expired.
Sample(s) _____ were received in a broken container.

3. SAMPLE PRESERVATION

Sample(s) _____ were further preserved in sample receiving to meet recommended pH level(s). *Nitric Acid Lot #052804-HNO3; Sulfuric Acid Lot # 011-504-H2SO4; Sodium Hydroxide Lot # -082404-NaOH; Hydrochloric Acid Lot # 100902-HCl; Sodium Hydroxide and Zinc Acetate Lot # 071604-CH3COO2ZN/NaOH*
Sample(s) _____ were received with bubble > 6 mm in diameter (cc: PM)

4. Other (see below or back)

Client ID	pH	Date	Initials

STL Cooler Receipt Form/Narrative
North Canton Facility

Client ID	pH	Date	Initials

Cooler	Temp	Method	Coolant

Discrepancies Cont.

SEVERN TRENT STL

END OF REPORT

MI0012770

B

MI0012771

APPENDIX B

COPY OF FIELD NOTES PERTAINING TO SOIL PILE EXCAVATION AND REMOVAL

MI0012772

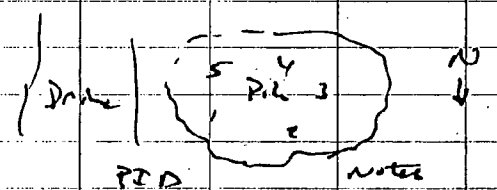
10-26-04 (36) 37248

TASK: Soil Excavation & Monitoring
Personnel: B Fruchey
Contractor: NA
Weather: 50's
H&S: Level D
Iso: PID 04620

0830: CRA Onsite, Calibrate PID w/ 100 ppm Isobutylene to 100

0900 Grab 5 random Samples from soil pile to measure PID

Truck [redacted] b/t 10-26-04



	PID	
#1	161	
#2	21.3	
#3	18.7	
#4	123	
#5	96.4	
#6	29.8	Taken at same loc as 1 after several buckets had been removed
#7	70.1	10' E of 3

10-26-04 (37) 37248

		PID
0930	Sample #8	62.6

→ from fresh sfc where soil is being loaded
→ 2nd Gravel Train Backing In

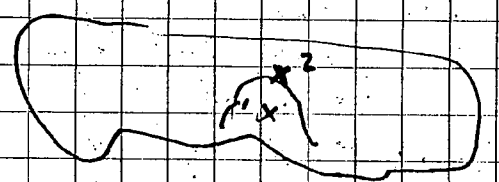
Note: Soils w/ most visual & olfactory signs of impact are measured w/ PID.

1000	Sample #9	27.6

from fresh excavation being loaded into truck

1015 Truck offsite, continuing excavation

1016



Excavating at location marked with an x'. Dug into dk black sand. Strong odor 1064 on PID. Did not remove any of the sand. Left it in the hole

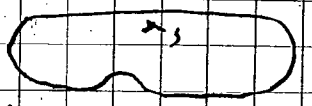
1030 #2 Black Soil 1004 → PID
Soil Did not go into pile to be moved offsite

MI0012773

10-26-04 (38) 37248

1045 20' East of Shack
at grade, operator thought
he smelled something, checked
out soil, no odors or PID
→ Note: Did test pit
~1½' below grade → dk
black and gravel sand
Very strong odor
1999 → PID
Remove upper 1½' → leave → 22"
black soil in hole
Brown soil ~ 4" above
contact → PID 23.9
1110 Excavated down to dk
black layer
1200 Called MissDig For Locate
Starting Monday at 0800
Miss Dig # B430 00761
1220 Truck onsite to load
Took sample from front
of soil pile, no odor, PID 1.2
1315 Excavating Next to Injection
Shack, more black dirt ~2' BG
Strong solvent like odor PID >2000
Leave Dirt in hole

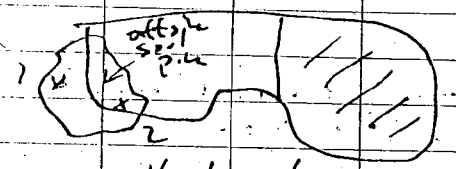
10-26-04 (39) 37248

1325 

Took sample From Floor at
location x → PID 19.2
1345 Call from Qwest worldwide
area is clear,
Also, loading gravel train
took sample from pile
where loader is pulling from
slight odor, PID 55.1
Impacts are strong near
the injection shed, on west
side
1415 MEK, Lactol & DIBK tanks
being prepped to pick up
M.E.K } O_2 20.9 %LEL 0
Lactol } CO ppm 0 H_2S 0
EMA took measurements inside
both tanks
Tanks had been open since
last Christmas
1430 Gravel Train onsite, took
sample from front of
pile PID 44.2 slight
odor

10-26-04 (40) 37248

1510 Done excavating hole for Day



Hachured area has been excavated. Took two soil samples from pile

(1) strong odor, black
PID → 182

(2) moderate to strong odor
black, PID → 131

→ Trucks will be loaded w/ soil from soil pile at 0600

BLF

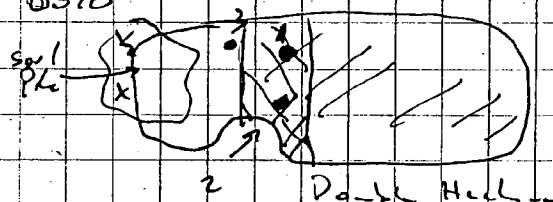
10-27-04 (41) 37248

TASK: Soil Pile Excavation
Personnel: B Fruchey
Contractor: NA
Weather: 50's - 60's partly sun
H&S: Level D
Iso: PID 04620
water level 04679

0750 CRA Onsite Calibrate PID w/ 100ppm Isobutylene to 100

0800 DTW on MW-7 1.94

0810



Hachured area excavated

Double Hachured area new excavation

Took 2 samples from floor
Location • 1 → PID 6.7
• 2 → 9.3

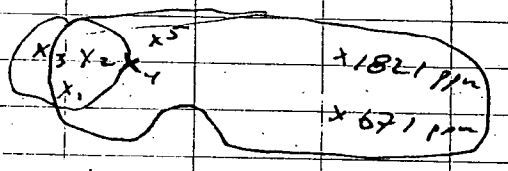
2 Samples from soil Pile
X_1 & X_2
PID → 10.7 → 12.2

0920 Took 2 samples from pile
26.2, 10.1 ppm

1 From X_3 above, PID 33.8, black soil, sweet smell

10-27-04 (42) 37248

0930 Excavator stirs up soil & mixes it in hole → ~4'26
2 PID readings w/ Dogs in hole



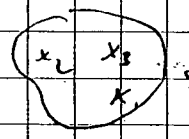
Take 3 more samples from p.k
x_1 → 50.1
x_2 → 30.7
x_3 → 83.5

1000 Took 2 more samples at x_4 & x_5
x_4 → 65.1 Both were of
x_5 → 63.2 samples that was going to stay in hole

1030 MW-2 DTW → 4.6 - 3.3 ft BGS
Took Draper Tube → Soil at Loc x_5 - clean, 300 ppm after 6 Pumps. Measures both Benzene & chloro benzene
Soil did not go into p.k

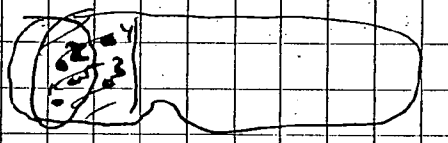
10-27-04 (43) 37248

1145 → More excavation



Soil P.k - N of old Tank Area →
← N
x_1 → 51.5
x_2 → 101
x_3 → 85.7

1430



Excavating the land area
Took 2 samples from remainder of soil p.k as it was being loaded
1 → 60.2
2 → 45.7
3 → 32.7
4 → 84.2
5 → 60.1
} From P.k to be removed
Soil Bags Removed from location
Note @ 1130 applied 1st H_2O_2 treatment to western 1/3
Mixing batch for middle 1/3

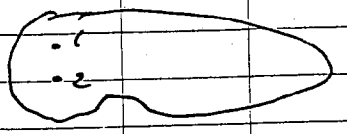
MI0012776

10-27-04 (44) 37248

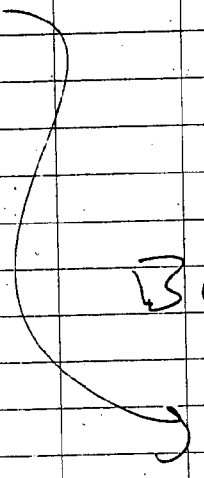
1500 Took 2 more samples from bottom of excavated area on w side of excavation

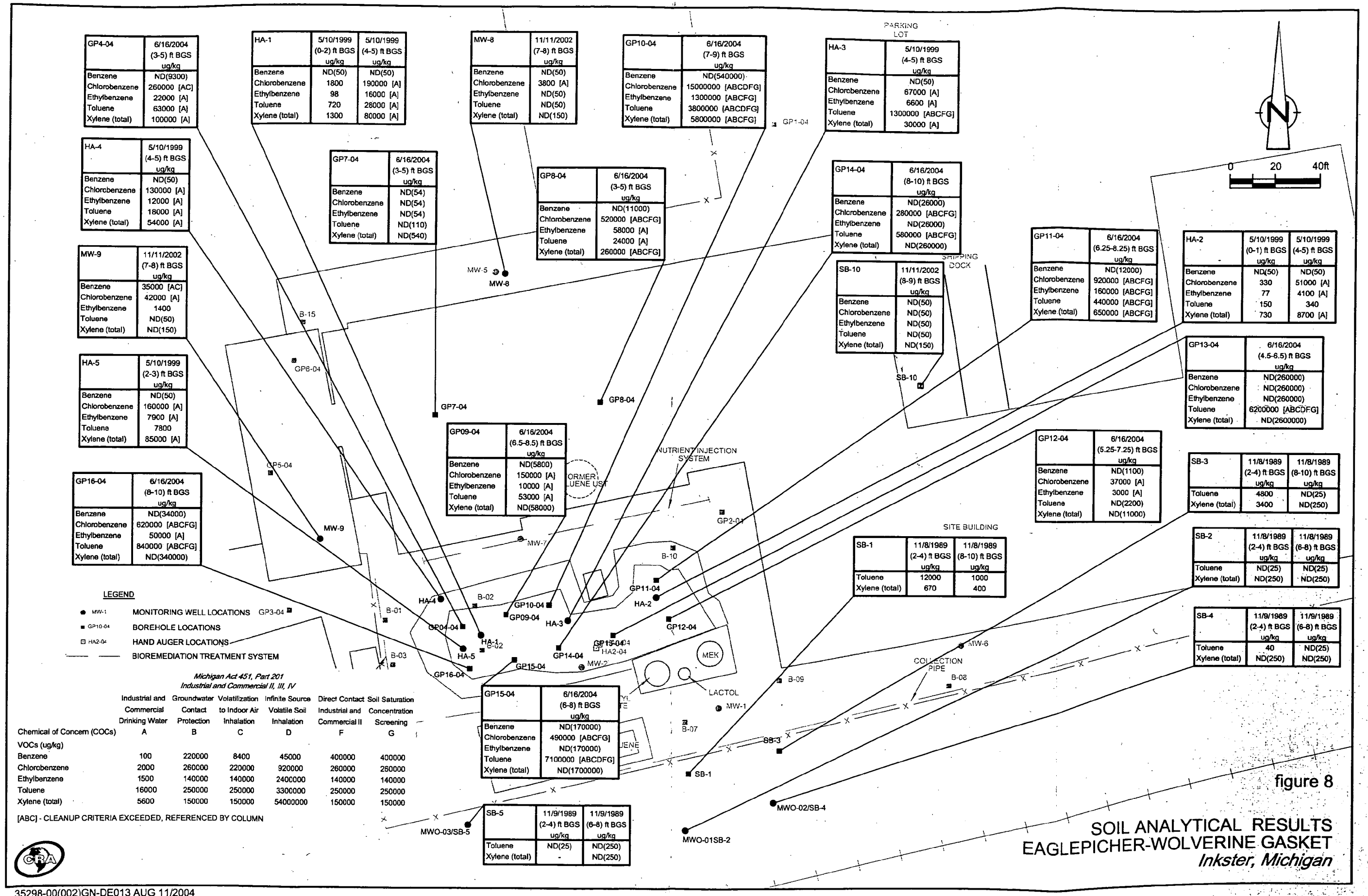
1. 67.1

2. 42.7



both samples are representative of what went into truck





GP4-04	6/16/2004 (3-5) ft BGS ug/kg
Benzene	ND(9300)
Chlorobenzene	260000 [AC]
Ethylbenzene	22000 [A]
Toluene	63000 [A]
Xylene (total)	100000 [A]

HA-1	5/10/1999 (0-2) ft BGS ug/kg	5/10/1999 (4-5) ft BGS ug/kg
Benzene	ND(50)	ND(50)
Chlorobenzene	1800	190000 [A]
Ethylbenzene	98	16000 [A]
Toluene	720	28000 [A]
Xylene (total)	1300	80000 [A]

MW-8	11/11/2002 (7-8) ft BGS ug/kg
Benzene	ND(50)
Chlorobenzene	3800 [A]
Ethylbenzene	ND(50)
Toluene	ND(50)
Xylene (total)	ND(150)

GP10-04	6/16/2004 (7-9) ft BGS ug/kg
Benzene	ND(540000)
Chlorobenzene	15000000 [ABCDFG]
Ethylbenzene	1300000 [ABCFG]
Toluene	3800000 [ABCDFG]
Xylene (total)	5800000 [ABCFG]

HA-3	5/10/1999 (4-5) ft BGS ug/kg
Benzene	ND(50)
Chlorobenzene	67000 [A]
Ethylbenzene	6600 [A]
Toluene	1300000 [ABCFG]
Xylene (total)	30000 [A]

HA-4	5/10/1999 (4-5) ft BGS ug/kg
Benzene	ND(50)
Chlorobenzene	130000 [A]
Ethylbenzene	12000 [A]
Toluene	18000 [A]
Xylene (total)	54000 [A]

GP7-04	6/16/2004 (3-5) ft BGS ug/kg
Benzene	ND(54)
Chlorobenzene	ND(54)
Ethylbenzene	ND(54)
Toluene	ND(110)
Xylene (total)	ND(540)

GP8-04	6/16/2004 (3-5) ft BGS ug/kg
Benzene	ND(11000)
Chlorobenzene	520000 [ABCFG]
Ethylbenzene	58000 [A]
Toluene	24000 [A]
Xylene (total)	260000 [ABCFG]

GP14-04	6/16/2004 (8-10) ft BGS ug/kg
Benzene	ND(26000)
Chlorobenzene	280000 [ABCFG]
Ethylbenzene	ND(26000)
Toluene	580000 [ABCFG]
Xylene (total)	ND(260000)

MW-9	11/11/2002 (7-8) ft BGS ug/kg
Benzene	35000 [AC]
Chlorobenzene	42000 [A]
Ethylbenzene	1400
Toluene	ND(50)
Xylene (total)	ND(150)

SB-10	11/11/2002 (8-9) ft BGS ug/kg
Benzene	ND(50)
Chlorobenzene	ND(50)
Ethylbenzene	ND(50)
Toluene	ND(50)
Xylene (total)	ND(150)

GP11-04	6/16/2004 (6.25-8.25) ft BGS ug/kg
Benzene	ND(12000)
Chlorobenzene	920000 [ABCFG]
Ethylbenzene	160000 [ABCFG]
Toluene	440000 [ABCFG]
Xylene (total)	650000 [ABCFG]

HA-2	5/10/1999 (0-1) ft BGS ug/kg	5/10/1999 (4-5) ft BGS ug/kg
Benzene	ND(50)	ND(50)
Chlorobenzene	330	51000 [A]
Ethylbenzene	77	4100 [A]
Toluene	150	340
Xylene (total)	730	8700 [A]

HA-5	5/10/1999 (2-3) ft BGS ug/kg
Benzene	ND(50)
Chlorobenzene	160000 [A]
Ethylbenzene	7900 [A]
Toluene	7800
Xylene (total)	85000 [A]

GP13-04	6/16/2004 (4.5-6.5) ft BGS ug/kg
Benzene	ND(260000)
Chlorobenzene	ND(260000)
Ethylbenzene	ND(260000)
Toluene	6200000 [ABCDFG]
Xylene (total)	ND(2600000)

GP09-04	6/16/2004 (6.5-8.5) ft BGS ug/kg
Benzene	ND(5800)
Chlorobenzene	150000 [A]
Ethylbenzene	10000 [A]
Toluene	53000 [A]
Xylene (total)	ND(58000)

GP12-04	6/16/2004 (5.25-7.25) ft BGS ug/kg
Benzene	ND(1100)
Chlorobenzene	37000 [A]
Ethylbenzene	3000 [A]
Toluene	ND(2200)
Xylene (total)	ND(11000)

SB-3	11/8/1989 (2-4) ft BGS ug/kg	11/8/1989 (8-10) ft BGS ug/kg
Toluene	4800	ND(25)
Xylene (total)	3400	ND(250)

GP16-04	6/16/2004 (8-10) ft BGS ug/kg
Benzene	ND(34000)
Chlorobenzene	620000 [ABCFG]
Ethylbenzene	50000 [A]
Toluene	840000 [ABCFG]
Xylene (total)	ND(340000)

SB-1	11/8/1989 (2-4) ft BGS ug/kg	11/8/1989 (8-10) ft BGS ug/kg
Toluene	12000	1000
Xylene (total)	670	400

SB-2	11/8/1989 (2-4) ft BGS ug/kg	11/8/1989 (6-8) ft BGS ug/kg
Toluene	ND(25)	ND(25)
Xylene (total)	ND(250)	ND(250)

SB-4	11/9/1989 (2-4) ft BGS ug/kg	11/9/1989 (6-8) ft BGS ug/kg
Toluene	40	ND(25)
Xylene (total)	ND(250)	ND(250)

GP15-04	6/16/2004 (6-8) ft BGS ug/kg
Benzene	ND(170000)
Chlorobenzene	490000 [ABCFG]
Ethylbenzene	ND(170000)
Toluene	7100000 [ABCDFG]
Xylene (total)	ND(1700000)

SB-5	11/9/1989 (2-4) ft BGS ug/kg	11/9/1989 (6-8) ft BGS ug/kg
Toluene	ND(25)	ND(250)
Xylene (total)	-	ND(250)

Michigan Act 451, Part 201
Industrial and Commercial II, III, IV

Chemical of Concern (COCs)	Industrial and Commercial Drinking Water A	Groundwater Contact Protection B	Volatilization to Indoor Air Inhalation C	Infinite Source Volatile Soil Inhalation D	Direct Contact Industrial and Commercial II F	Soil Saturation Concentration Screening G
VOCs (ug/kg)						
Benzene	100	220000	8400	45000	400000	400000
Chlorobenzene	2000	260000	220000	920000	260000	260000
Ethylbenzene	1500	140000	140000	2400000	140000	140000
Toluene	16000	250000	250000	3300000	250000	250000
Xylene (total)	5600	150000	150000	54000000	150000	150000

[ABC] - CLEANUP CRITERIA EXCEEDED, REFERENCED BY COLUMN

figure 8

SOIL ANALYTICAL RESULTS
EAGLEPICHER-WOLVERINE GASKET
Inkster, Michigan

35298-00(002)GN-DE013 AUG 11/2004

MI0012778

Recon mgmt

Mapping

City Hall
Hillsdale

Register of Deeds
517/437-2231

Marty Bookman
248/540-0160

419/[illegible] City Assessor office
353-1330

Joyce
437

BoB
Mulholland
800/624-5302

Tom
419/396-0795

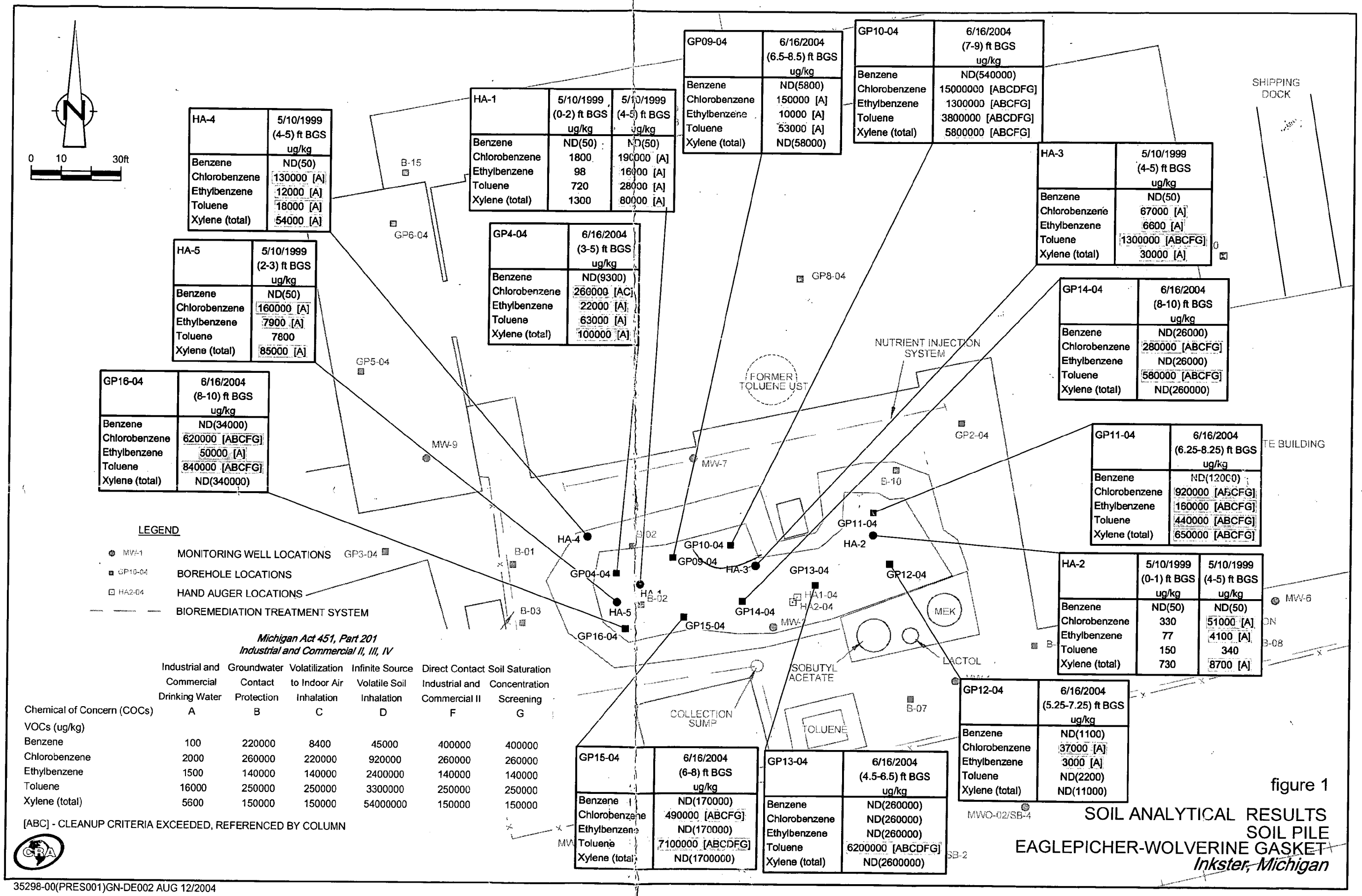
Jeanne
313/388-8178

Dan
313

Kathy Wilson
517/788-5250

Ed
313/388-2975

1-800-



HA-4	5/10/1999 (4-5) ft BGS ug/kg
Benzene	ND(50)
Chlorobenzene	130000 [A]
Ethylbenzene	12000 [A]
Toluene	18000 [A]
Xylene (total)	54000 [A]

HA-5	5/10/1999 (2-3) ft BGS ug/kg
Benzene	ND(50)
Chlorobenzene	160000 [A]
Ethylbenzene	7900 [A]
Toluene	7800
Xylene (total)	85000 [A]

GP16-04	6/16/2004 (8-10) ft BGS ug/kg
Benzene	ND(34000)
Chlorobenzene	620000 [ABCFG]
Ethylbenzene	50000 [A]
Toluene	840000 [ABCFG]
Xylene (total)	ND(340000)

HA-1	5/10/1999 (0-2) ft BGS ug/kg	5/10/1999 (4-5) ft BGS ug/kg
Benzene	ND(50)	ND(50)
Chlorobenzene	1800	190000 [A]
Ethylbenzene	98	16000 [A]
Toluene	720	28000 [A]
Xylene (total)	1300	80000 [A]

GP4-04	6/16/2004 (3-5) ft BGS ug/kg
Benzene	ND(9300)
Chlorobenzene	260000 [AC]
Ethylbenzene	22000 [A]
Toluene	63000 [A]
Xylene (total)	100000 [A]

GP09-04	6/16/2004 (6.5-8.5) ft BGS ug/kg
Benzene	ND(5800)
Chlorobenzene	150000 [A]
Ethylbenzene	10000 [A]
Toluene	53000 [A]
Xylene (total)	ND(58000)

GP10-04	6/16/2004 (7-9) ft BGS ug/kg
Benzene	ND(540000)
Chlorobenzene	15000000 [ABCDFG]
Ethylbenzene	1300000 [ABCFG]
Toluene	3800000 [ABCDFG]
Xylene (total)	5800000 [ABCFG]

HA-3	5/10/1999 (4-5) ft BGS ug/kg
Benzene	ND(50)
Chlorobenzene	67000 [A]
Ethylbenzene	6600 [A]
Toluene	1300000 [ABCFG]
Xylene (total)	30000 [A]

GP14-04	6/16/2004 (8-10) ft BGS ug/kg
Benzene	ND(26000)
Chlorobenzene	280000 [ABCFG]
Ethylbenzene	ND(26000)
Toluene	580000 [ABCFG]
Xylene (total)	ND(260000)

GP11-04	6/16/2004 (6.25-8.25) ft BGS ug/kg
Benzene	ND(12000)
Chlorobenzene	920000 [ABCFG]
Ethylbenzene	160000 [ABCFG]
Toluene	440000 [ABCFG]
Xylene (total)	650000 [ABCFG]

HA-2	5/10/1999 (0-1) ft BGS ug/kg	5/10/1999 (4-5) ft BGS ug/kg
Benzene	ND(50)	ND(50)
Chlorobenzene	330	51000 [A]
Ethylbenzene	77	4100 [A]
Toluene	150	340
Xylene (total)	730	8700 [A]

GP12-04	6/16/2004 (5.25-7.25) ft BGS ug/kg
Benzene	ND(1100)
Chlorobenzene	37000 [A]
Ethylbenzene	3000 [A]
Toluene	ND(2200)
Xylene (total)	ND(11000)

GP15-04	6/16/2004 (6-8) ft BGS ug/kg
Benzene	ND(170000)
Chlorobenzene	490000 [ABCFG]
Ethylbenzene	ND(170000)
Toluene	7100000 [ABCDFG]
Xylene (total)	ND(1700000)

GP13-04	6/16/2004 (4.5-6.5) ft BGS ug/kg
Benzene	ND(260000)
Chlorobenzene	ND(260000)
Ethylbenzene	ND(260000)
Toluene	6200000 [ABCDFG]
Xylene (total)	ND(2600000)

Michigan Act 451, Part 201
Industrial and Commercial II, III, IV

Chemical of Concern (COCs)	Industrial and Commercial Drinking Water A	Groundwater Contact Protection B	Volatilization to Indoor Air Inhalation C	Infinite Source Volatile Soil Inhalation D	Direct Contact Industrial and Commercial II F	Soil Saturation Concentration Screening G
VOCs (ug/kg)						
Benzene	100	220000	8400	45000	400000	400000
Chlorobenzene	2000	260000	220000	920000	260000	260000
Ethylbenzene	1500	140000	140000	2400000	140000	140000
Toluene	16000	250000	250000	3300000	250000	250000
Xylene (total)	5600	150000	150000	54000000	150000	150000

[ABC] - CLEANUP CRITERIA EXCEEDED, REFERENCED BY COLUMN

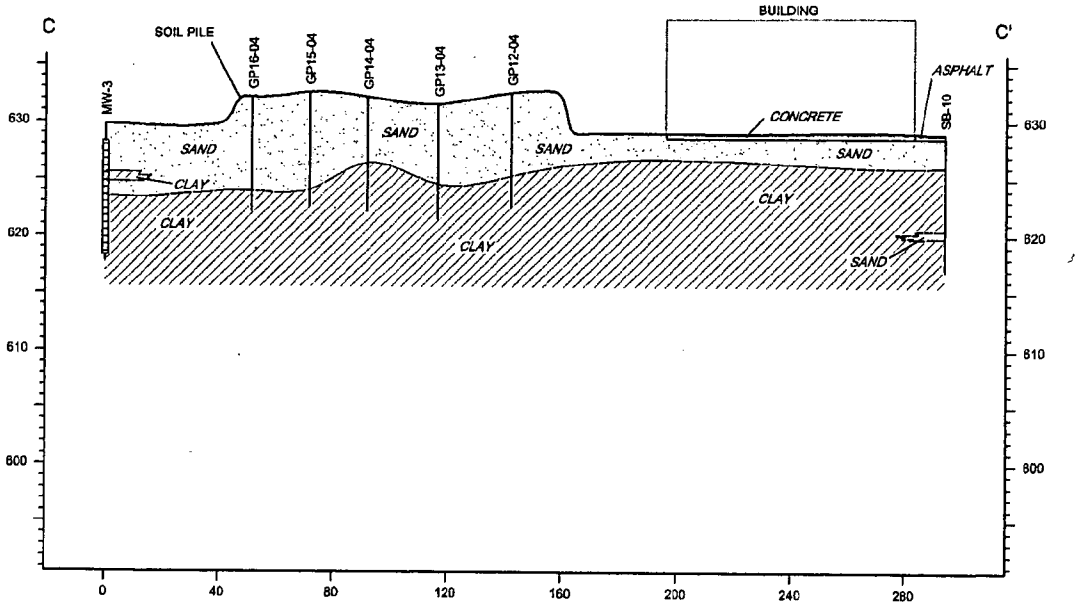
CRA

figure 1

SOIL ANALYTICAL RESULTS
SOIL PILE
EAGLEPICHER-WOLVERINE GASKET
Inkster, Michigan

35298-00(PRES001)GN-DE002 AUG 12/2004

MI0012780



HORIZONTAL SCALE: 1"=40'
VERTICAL SCALE: 1"=10'

LEGEND

- SAND
- CLAY
- ASPHALT/CONCRETE

MW-O-01 — WELL I.D.
WELL
WELL SCREEN

figure 6

C-C' CROSS SECTION
EAGLEPICHER - WOLVERINE GASKET
Inkster, Michigan

35298-00(002)GN-DE011 AUG 09/2004

MI0012781

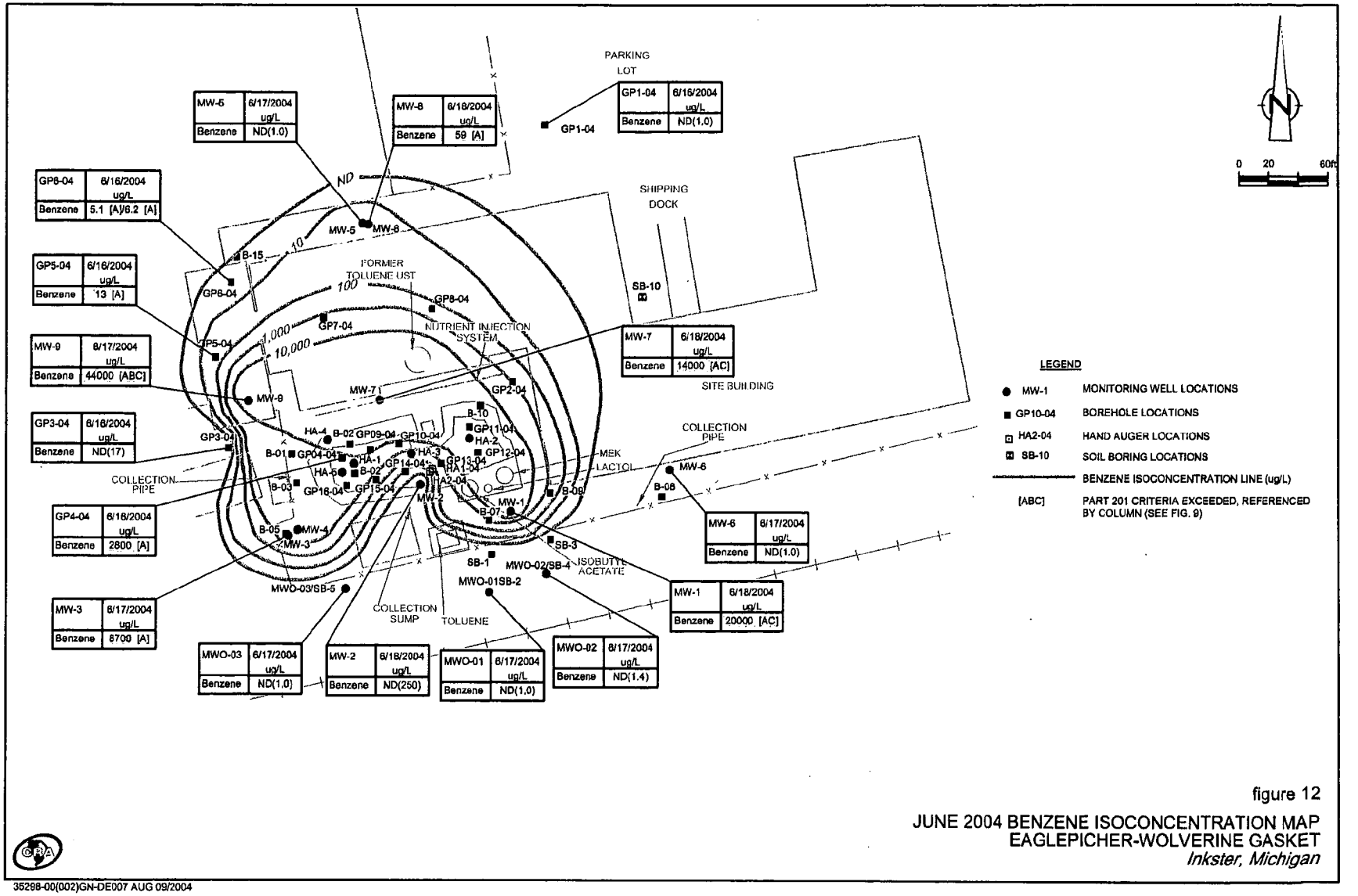


figure 12

JUNE 2004 BENZENE ISOCONCENTRATION MAP
EAGLEPICHER-WOLVERINE GASKET
Inkster, Michigan

35298-00(002)GN-DE007 AUG 09/2004

MI0012782

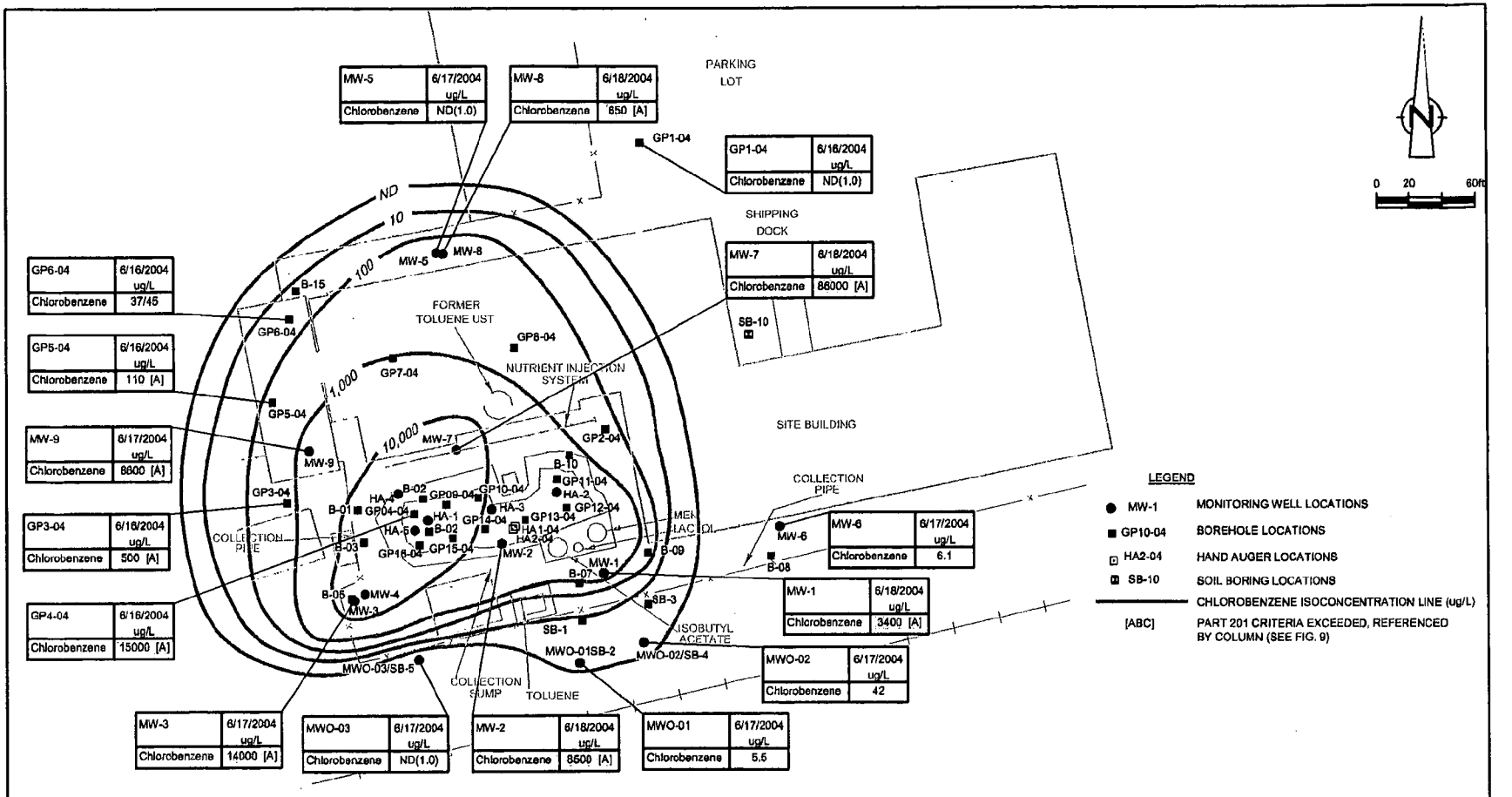


figure 11

JUNE 2004 CHLOROBENZENE ISOCONCENTRATION MAP
EAGLEPICHER-WOLVERINE GASKET
Inkster, Michigan

35298-00(002)GN-DE003 AUG 09/2004

MI0012783

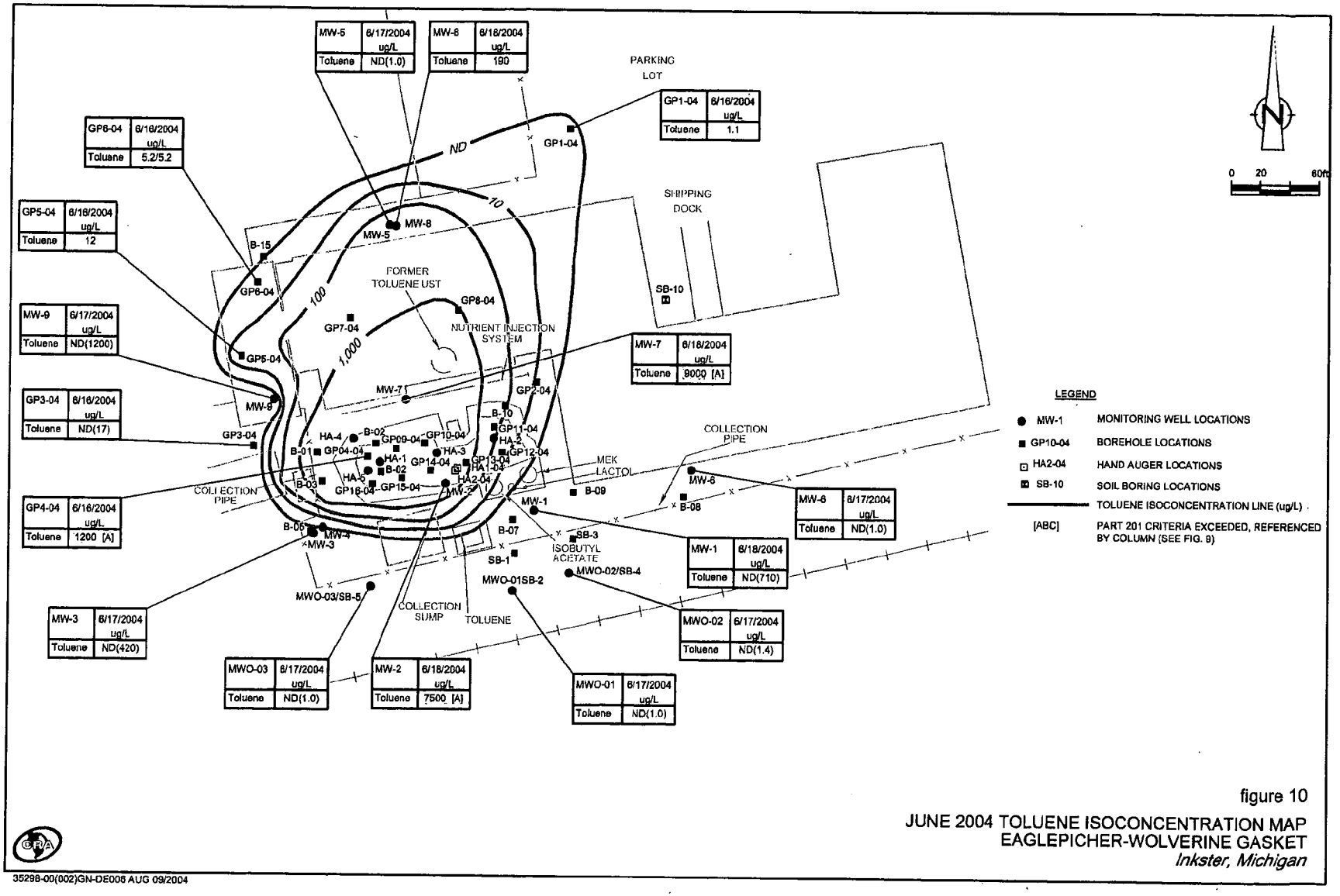


figure 10

JUNE 2004 TOLUENE ISOCONCENTRATION MAP
EAGLEPICHER-WOLVERINE GASKET
Inkster, Michigan

35298-00(002)GN-DE008 AUG 09/2004

MI0012784

Summary of site options

Option	Estimated Installation Cost	Comments
Trench Replacement	$36,000	Plus O&M costs $700/month(peroxide and 1 check-up) Will require a longer treatment time Cannot waste any water to the sewer Some additional tests should be run to optimize the system
Passive Option	$83,450	Plus O&M costs $2,400 per month Assumes wasting of water to the sewer ($750 of O&M cost and $1,000 of installation cost) System optimization will be done based on system O&M sampling
Aggressive Option	$110,250	Plus O&M costs of $2,500 per month Assumes wasting of water to the sewer ($750 of O&M cost and $1,000 of installation cost) System optimization will be done based on system O&M sampling
Upgrade from Passive to Aggressive	$50,300	O&M costs increase from $2,400 to $2,500 per month
Soil Disposal Costs	$73,500	From EQ cost estimate of 450 tons at $163 per ton
Chemical Oxidation	>$200,000	Not recommended due to safety concerns. High oxygen levels throughout the site High Temperatures in the subsurface We would need to do approximately $20,000 to $50,000 worth of testing to design the system The costs could escalate based on actual oxygen demand and could be as high as $500,000. Oxidation would be the fastest approach

MI00012785

Rommeck, Doug

From: Dan Giesler [dgiesler@ema-env.com]
Sent: Friday, October 22, 2004 11:28 AM
To: margaret.levigne@eqonline.com; Brian Surane
Cc: PBENOIST@ema-env.com; Rommeck, Doug
Subject: Wolverine

Margy and Brian:

I wanted to touch base with you both with regard to the project we are doing at Wolverine in Inkster, MI next week. We are going to start loading Tuesday morning and would like to get trucks scheduled at the site starting at 7:00 a.m. If we could have the first one at 7:00 and stagger the next two 30 minutes that would be optimal as we cannot have too many trucks at the site at once due to space constraints. We estimate that there will be approximately 15 loads at 50 tons each. Per our conversation, Margaret will over-night Doug Rommeck 20 manifests so he can review them on Monday.

Our main concern is turn time on the trucks. We want to make sure that EQ will flip the manifests quickly so we can get it over to the Non-Haz Landfill and back to Wolverine. At a minimum we would like 3 turns per day on the trucks. Given the locations of each facility it should work.

I understand that this is by no means a major project, but it one that is very visible within Eagle Picher's corporate hierarchy and needs to go off with out any problems. I really appreciate both of you supporting EMA and EP on this project and I look forwarding to completing it in a successful and timely manner.

Please call me if you have any questions.

Daniel J. Giesler

Environmental Management Alternatives, Inc.
10627 Midwest Industrial Dr.
St. Louis, MO 63132
314-785-6425 Office
314-785-6426 Fax
314-518-9367 Mobile

www.ema-env.com

THE ENVIRONMENTAL QUALITY COMPANY ®

Generator Approval Notification **October 22, 2004**

Customer: ENVIRONMENTAL MGMT. ALTERNATIVE
Fax: (314) 785-6426

~~CHERYL JAMES~~
WOLVERINE GASKET & MFG.
2638 PRINCESS
INKSTER, MI 48141

This Generator Approval Notification acknowledges the acceptability of waste material(s) into the EQ environmental protection facility identified below and ensures that this facility has the appropriate permit(s) issued by federal and state regulatory agencies to properly transport, treat, and/or dispose of the waste material(s).

EQ FACILITY: Michigan Disposal Waste Treatment Plant (MID000724831)
49350 North I-94 Service Drive, Belleville, Michigan 48111

Approval Number: 101904TBB

Generator EPA ID #: MID005354386 **Approved Container:** TONS **Expires On:** 10/21/2005
Waste Common Name: contaminated soil
Comments: NO FREE LIQUIDS.

Primary Waste Code: SLUD

The Approval(s) listed above are based upon characterization information supplied to EQ by the Customer and the generator (if other than the Customer). The Customer is ultimately responsible for the accuracy and completeness of all such information, whether provided by the Customer or the generator. The Customer must notify the EQ Resource Team immediately upon knowledge of any changes to this information. This Approval and all wastes which are transported, delivered, or tendered to EQ under this Approval shall be subject to the attached Standard Terms and Conditions.

The Approval(s) will expire on the date(s) noted. Any new Approvals obtained from EQ on future business will be valid for a period of one (1) year from the date of issuance. Within 60 days of the Approval Expiration Date, you will be notified of the requirements for recertification.

EQ Tracking #_____

WASTE CHARACTERIZATION REPORT

TO EXPEDITE YOUR WASTE APPROVAL, PLEASE COMPLETE THIS FORM ENTIRELY

Please Choose One EQ Management Facility

☒ **Michigan Disposal Waste Treatment Plant** (Stabilization and Treatment)	49350 N. I-94 Service Drive, Belleville, MI 48111 Phone: 800-592-5489 Fax: 800-592-5329	EPA ID # MID 000 724 831
☐ **Wayne Disposal, Inc. Site #2 Landfill** (Hazardous & Chemical Waste Landfill)	49350 N. I-94 Service Drive, Belleville, MI 48111 Phone: 800-592-5489 Fax: 800-592-5329	EPA ID # MID 048 090 633
☐ **EQ Resource Recovery, Inc.** (Solvent Recycling, Fuel Blending, WW Treatment)	36345 Van Born Road, Romulus, MI 48174 Phone: 866-373-8357 Fax: 734-326-4033	EPA ID # MID 060 975 844
☐ **EQ Transfer & Processing** (Drum Transfer/Non-Hazardous Waste Processing)	1010 Old Rawsonville Rd., Ypsilanti, MI 48198 Phone: 734-547-1000 Fax: 734-480-9195	EPA ID # MIR 000 033 969
☐ **EQ Indianapolis** (Drum Transfer/Non-Hazardous Waste Processing)	4000 West 10th Street, Indianapolis, IN 46222 Phone: 317-247-7160 Fax: 317-247-7170	EPA ID # IND 161 049 309
☐ **EQ Atlanta** (Drum Transfer/Non-Hazardous Waste Processing)	5600 Fulton Industrial Blvd South, Atlanta, GA 30336 Phone: 404-494-3520 Fax: 404-494-3560	EPA ID # MI0 000 131 292

Section 1 – Generator & Customer Information

SIC # ____

Generator EPA ID # MID005354386

Generator WOLVERINE GASKET

Facility Address 2638 PRINCESS ST.

City INKSTER State MI Zip

County ____

Mailing Address (if different) SAME

City ____ State ____ Zip ____-____

Generator Contact DOUG ROMMECK

Title ____

Phone ____ Fax ____

EQ Customer No. 3340

Invoicing Company EMA

Address 10627 MIDWEST INDUSTRIAL BLVD.

City ST. LOUIS State MO Zip 63132

Country ____

Invoicing Contact DAN GIESLER

Phone 314-785-6425 Fax 314-785-6426

Technical Contact PETE BENOIST

Phone 314-785-6425 Fax 314-785-6426

Section 2 – Shipping & Packaging Information

2.1) Shipping Volume 1000 TONS
Shipping Frequency ☐ One Time Only ☒ Annual

2.2) DOT Shipping Name NON RCRA/NON DOT REGULATED

Density ____ lbs./gallon or lbs./cubic yard (or) Specific Gravity ____.

2.3) Packaging **(check all that apply)**
- ☐ Bulk Solid (Yd^3 < 2000 lbs/yd^3)
- ☒ Bulk Solid (Ton >2000 lbs/yd^3)
- ☐ Bulk Liquids (Gallon)
- ☐ Cubic Yard Boxes/Bags
- ☐ Drums
- ☐ Other (palletized, 5 gal. Pail, etc.) ____

Quoted bulk disposal charges for solid materials will be billed by the cubic yard, if the waste density is less than 2,000 lbs./cy. If waste density is greater than 2,000 lbs./cy, then bulk disposal charges will be billed by the ton, regardless of the approved container.

Section 3 – Physical Characteristics

Waste Common Name: CONTAMINATED SOIL

3.1) Color BROWN
3.2) Odor MILD
3.3) Physical State at 70°F **(check all that apply)**
☒ Solid ☐ Dust ☐ Liquid ☐ Sludge

3.4) Does this waste contain? **(check all that apply)**
☐ Free Liquids ☐ Biodegradable Sorbants ☐ Powders
☐ Metal Fines ☐ Oily Residue ☒ None

3.5) Does this waste contain? **(check all that apply)**
☐ Asbestos – friable ☐ Pyrophoric Waste
☐ Asbestos – non-friable ☐ Reactive Waste
☐ Dioxins ☐ Shock Sensitive Waste
☐ Furans ☐ Radioactive Waste
☐ Biohazard ☐ Explosives
☒ None

3.6) Describe the composition of the waste (i.e. key chemical compounds, soil, water, ppe, debris, etc.)

SOIL to 100%
_____ ____ to ____%
_____ ____ to ____%
_____ ____ to ____%
Total = 100%

3.7) Does this waste contain >50% contaminated soil? ☒ Yes ☐ No

3.8) Does this waste contain >50% debris by volume? ☐ Yes ☒ No
(Debris is greater than 2.5 inches in size.)

Dec 07 2004 10:06AM HP LASERJET 3330 p.2

MI0012788

Section 4 – Generating Process and Regulatory Information

4.1) Provide a *detailed* description of the process (es) generating this waste (attach flow diagram if available).
EXCAVATION OF SOIL AROUND PLANT

Based upon RCRA waste regulations (40 CFR 261) and Michigan Act 451 Rules: Waste Code (s)

4.2) Is this an **EPA RCRA** listed hazardous waste (F, K, P or U)? ☐ Yes ☒ No ____

4.3) Is this a **MICHIGAN** hazardous waste (Other than RCRA)? ☐ Yes ☒ No ____

4.4) Is this a **MICHIGAN** non-hazardous liquid industrial waste? ☐ Yes ☒ No ____

4.5) Is this a **UNIVERSAL** waste? ☐ Yes ☒ No

4.6) Does this waste exceed **LDR** treatment standards? ☐ Yes ☒ No

4.7) Is this an **EPA RCRA** characteristic hazardous waste (D001-D043)? ☐ Yes ☒ No ____

4.8) What is the flash point of this waste? ☐ <90°F ☐ 90-140°F ☐ 140-199°F ☒ >200°F

4.9) Is the waste an oxidizer? ☐ Yes ☒ No

4.10) What is the pH of this waste? ☐ ≤2 ☐ 2-4.9 ☒ 5-10 ☐ 10.1-12.4 ☐ ≥12.5

4.11) Does this waste contain reactive cyanide ≥ 250 ppm? ☐ Yes ☒ No

4.12) Does this waste contain reactive sulfide ≥ 500 ppm? ☐ Yes ☒ No

4.13) Is the waste surcharge exempt? ☐ Yes ☒ No

Code		Regulatory Level TCLP (mg/l)	Concentration (if above)
D004	Arsenic	5	☒ Below ☐ Above ____
D005	Barium	100	☒ Below ☐ Above ____
D006	Cadmium	1	☒ Below ☐ Above ____
D007	Chromium	5	☒ Below ☐ Above ____
D008	Lead	5	☒ Below ☐ Above ____
D009	Mercury	0.2	☒ Below ☐ Above ____
D010	Selenium	1	☒ Below ☐ Above ____
D011	Silver	5	☒ Below ☐ Above ____
D012	Endrin	0.02	☒ Below ☐ Above ____
D013	Lindate	0.4	☒ Below ☐ Above ____
D014	Methoxychlor	10	☒ Below ☐ Above ____
D015	Toxaphene	0.5	☒ Below ☐ Above ____
D016	2,4-D	10	☒ Below ☐ Above ____
D017	2,4,5-TP (Silvex)	1	☒ Below ☐ Above ____
D018	Benzene	0.5	☒ Below ☐ Above ____
D019	Carbon Tetrachloride	0.5	☒ Below ☐ Above ____
D020	Chlordane	0.03	☒ Below ☐ Above ____
D021	Chlorobenzene	100	☒ Below ☐ Above ____
D022	Chloroform	6.0	☒ Below ☐ Above ____
D023	o-Cresol	200	☒ Below ☐ Above ____

Code		Regulatory Level TCLP (mg/l)	Concentration (if above)
D024	m-Cresol	200	☒ Below ☐ Above ____
D025	p-Cresol	200	☒ Below ☐ Above ____
D026	Cresols	200	☒ Below ☐ Above ____
D027	1,4-Dichlorobenzez	7.5	☒ Below ☐ Above ____
D028	1,2-Dicholoroethane	0.5	☒ Below ☐ Above ____
D029	1,1-Dichloroethylene	0.7	☒ Below ☐ Above ____
D030	2,4-Dinitrotoluene	0.13	☒ Below ☐ Above ____
D031	Heptachlor	0.008	☒ Below ☐ Above ____
D032	Hexachlorobenzene	0.13	☒ Below ☐ Above ____
D033	Hexachlorobutadiene	0.5	☒ Below ☐ Above ____
D034	Hexachloroethane	3.0	☒ Below ☐ Above ____
D035	Methyl Ethyl Ketone	200	☒ Below ☐ Above ____
D036	Nitrobenzene	2	☒ Below ☐ Above ____
D037	Pentachlorophenol	100	☒ Below ☐ Above ____
D038	Pyridine	5	☒ Below ☐ Above ____
D039	Tetrachloroethylene	0.7	☒ Below ☐ Above ____
D040	Trichloroethylene	0.5	☒ Below ☐ Above ____
D041	2,4,5-Trichlorophenol	400	☒ Below ☐ Above ____
D042	2,4,6-Trichlorophenol	2	☒ Below ☐ Above ____
D043	Vinyl Chloride	0.2	☒ Below ☐ Above ____

4.14) The hazardous constituent information is based on: ☐ Analysis (Please attach for review) ☒ Generator Knowledge ☐ Both

4.15) If this is a characteristic (D-coded) hazardous waste, does it contain underlying hazardous constituents (List in Section 5)? ☐ Yes ☐ No ☒ N/A

Section 5 – Constituent Information

Review the following items in the EQ Resource Guide and indicate their concentrations below:
1) **MVOC** (Michigan Volatile Organic Compounds) 2) **CCVOC** (Subpart CC Volatile Organic Compounds)
3) **UHC** (Underlying Hazardous Constituents 4) **TRI** (Toxic Release Inventory Constituents)
Indicate all constituents in your waste stream, their concentrations, and circle Yes or No for UHC:

UHC?	
☐ Yes ☐ No	
☐ Yes ☐ No	
☐ Yes ☐ No	

UHC?	
☐ Yes ☐ No	
☐ Yes ☐ No	
☐ Yes ☐ No	

Dec 07 2004 10:06AM HP LASERJET 3330 p.3

MI0012789

Section 6 – PCB & TSCA Information

6.1) What is the concentration of PCBs in the waste? ☒ None ☐ 0-5 ppm ☐ 6-49 ppm ☐ 50-499 ppm ☐ 500+ ppm

6.2) Does the waste contain PCB contamination from a source with a concentration ≥ 50 ppm? ☐ Yes ☒ No

6.3) Does this waste contain free liquids? (Use paint filter test) ☐ Yes ☒ No

6.4) Has this waste been processed into a non-liquid form? ☐ Yes ☒ No

If yes, what was the concentration of PCBs prior to processing? ☒ N/A ☐ 0-499 ppm ☐ 500+ ppm

6.5) Is the non-liquid PCB waste in the form of soil, rags, debris, or other contaminated media? ☐ Yes ☒ No

6.6) Are you a PCB capacitor manufacturer or a PCB equipment manufacturer? ☐ Yes ☒ No

6.7) Has the PCB Article (e.g., transformer, hydraulic machine, PCB-contaminated electrical equipment) been drained/flushed of all PCBs and decontaminated in accordance with 40 CFR 761.60(b)? ☒ N/A ☐ Yes ☐ No

Section 7 – Benzene NESHAP Information

NESHAP SIC CODES		
2812	2836	2875
2813	2841	2879
2816	2842	2891
2819	2843	2892
2821	2844	2893
2822	2851	2895
2823	2861	2899
2824	2865	2911
2833	2869	3312
2834	2873	4953
2835	2874	9511

7.1) Does this waste stream contain Benzene? (if "no" to 7.1, please skip to Section 8) ☐ Yes ☒ No

7.2) Does the waste stream come from a facility with one of the SIC codes listed under NESHAP? ☐ Yes ☒ No

7.3) Does your company manage wastes from facilities with Total Annual Benzene (TAB) ≥10 Mg/year? ☐ Yes ☒ No

If you answered "NO" to question 7.2 AND 7.3, please skip to Section 8.

7.4) Does the waste contain >10% water? ☐ Yes ☒ No

7.5) What is the TAB quantity for your facility? _____ Mg/Year

7.6) Does the waste contain >1.0 mg/kg total Benzene? ☐ Yes ☒ No

7.7) What is the total Benzene concentration in your waste? _____ Percent or _____ ppmw.
(Do not use TCLP analytical results. Acceptable laboratory methods include 8020, 8240, 8260, 602 and 624.)

Section 8 – Waste Constituent Information

Complete for Michigan Disposal Waste Treatment Plant, Wayne Disposal, and EQT&P

8.1) Does this waste contain any "Potentially Odorous Constituents" as defined in the EQ Resource Guide? ☐ Yes ☒ No

8.2) Does this waste contain any MVOC constituents as defined in the EQ Resource Guide? ☐ Yes ☒ No

8.3) Is this waste subject to Subpart CC regulation (i.e., contain >500 ppm (VOCs) Volatile Organic Compounds)? ☐ Yes ☒ No

If 8.1, 8.2, or 8.3 is "yes" – please indicate the constituents and their concentrations in the table provided in Section 5.

Section 9 – Reclamation/Recycling/Fuel Blending

Complete for EQ Resource Recovery ONLY.

9.1) Heat value (BTU/lb.) _____ Chlorine (%) _____ Water (%) _____ Solids (%) _____

9.2) Is this material a recoverable petroleum product? ☐ Yes ☒ No

9.3) Is this material for waste water treatment? ☐ Yes ☒ No

If you answered 9.2 or 9.3 "yes" – please attach the **Wastewater Addendum Form** found in the EQ Resource Guide.

Section 10 – Certification

I certify that all information (including attachments) is complete and factual and is an accurate representation of the known and suspected hazards, pertaining to the waste described herein. I authorize EQ's Resource Team to add supplemental information to the waste approval file, provided I am contacted and give verbal permission. I authorize EQ's Resource Team to obtain a sample from any waste shipment for purposes of verification and confirmation.

Generator Signature _____ Printed Name Don Gecko

Company _____ Title _____ Date 10/13/04

The generator's signature MUST appear on the EQ Waste Characterization Report. If the generator has authorized a third party to certify this document, a written notice (on generator letterhead) must accompany this submittal. Although the EQ Resource Team is authorized to make certain modifications to the information provided on this form, the addition or removal of waste codes and waste constituents must be documented by the generator.

Dec 07 2004 10:06AM HP LASERJET 3330 p.4

MI0012790

SAMPLE RESULTS REPORT

Report Date : 5/6/2004

Environmental Quality Company
49350 North I-94 Service Drive
Belleville, MI 48111

REPORT TO

EQ Approvals
Attn: Margaret Levigne

NC/BS

Sample ID: AA33791
Tracking Number: 69246
Generator: WOLVERINE GASKET
Waste Name: SOIL

F SERIES 1 TO 5 SCAN

Analyte Name	Result	Units	MDL	Analysis Date
CARBON TETRACHLORIDE	Less Than	PPM	6.0	05/06/2004
METHYLENE CHLORIDE	Less Than	PPM	30	05/06/2004
TETRACHLOROETHYLENE	Less Than	PPM	6.0	05/06/2004
1,1,1-TRICHLOROETHANE	Less Than	PPM	6.0	05/06/2004
TRICHLOROETHYLENE	Less Than	PPM	6.0	05/06/2004
TRICHLOROFLUOROMETHANE	Less Than	PPM	30	05/06/2004
1,1,2TRICHLORO1,2,2TRIFLUOROETHANE	Less Than	PPM	30	05/06/2004
CHLOROBENZENE	Less Than	PPM	6.0	05/06/2004
1,2-DICHLOROBENZENE	Less Than	PPM	6.0	05/06/2004
ACETONE	Less Than	PPM	160	05/06/2004
N-BUTYL ALCOHOL	Less Than	PPM	2.6	05/06/2004
ETHYL ACETATE	Less Than	PPM	33	05/06/2004
ETHYL BENZENE	Less Than	PPM	10	05/06/2004
METHYL ISOBUTYL KETONE	Less Than	PPM	33	05/06/2004
XYLENE	Less Than	PPM	30	05/06/2004
ETHYL ETHER	Less Than	PPM	160	05/06/2004
ISOBUTANOL	Less Than	PPM	170	05/06/2004
METHYL ETHYL KETONE	Less Than	PPM	36	05/06/2004
PYRIDINE	Less Than	PPM	16	05/06/2004
TOLUENE	Less Than	PPM	10	05/06/2004
CRESOL	Less Than	PPM	5.6	05/06/2004
NITROBENZENE	Less Than	PPM	14	05/06/2004
1,1,2-TRICHLOROETHANE	Less Than	PPM	6.0	05/06/2004
BENZENE	Less Than	PPM	10	05/06/2004

FLASHPOINT

Analyte Name	Result	Units	MDL	Analysis Date
FLASHPOINT	>140	DEG F	70	05/06/2004

pH

Analyte Name	Result	Units	MDL	Analysis Date
pH	8.54	SI UNITS	0.10	05/06/2004

PNA

Analyte Name	Result	Units	MDL	Analysis Date
Naphthalene	Less Than	ppm	5.6	05/06/2004
Acenaphthylene	Less Than	ppm	3.4	05/06/2004
Acenaphthene	Less Than	ppm	3.4	05/06/2004
Fluorene	Less Than	ppm	3.4	05/06/2004
Phenanthrene	Less Than	ppm	5.6	05/06/2004
Anthracene	Less Than	ppm	3.4	05/06/2004
Flouranthene	Less Than	ppm	3.4	05/06/2004
Pyrene	Less Than	ppm	8.2	05/06/2004
Benzo(a)anthracene	Less Than	ppm	3.4	05/06/2004
Chrysene	Less Than	ppm	3.4	05/06/2004

Benzo(k)fluoranthene	Less Than	ppm	6.8	05/06/2004
Benzo(a)pyrene	Less Than	ppm	6.8	05/06/2004
Dibenzo((a,h)anthracene	Less Than	ppm	3.4	05/06/2004
Benzo(ghi)perylene	Less Than	ppm	8.2	05/06/2004
Indeno(1,2,3-cd)pyrene	Less Than	ppm	1.8	05/06/2004
	Less Than	ppm	3.4	05/06/2004

REACTIVE CYANIDE

Analyte Name	Result	Units	MDL	Analysis Date
REACTIVE CYANIDE	Less than	MG/KG	3.0	05/06/2004

REACTIVE SULFIDE

Analyte Name	Result	Units	MDL	Analysis Date
REACTIVE SULFIDE	Less than	MG/KG	100	05/06/2004

TCLP ACID/BASE EXTRACTABLES

Analyte Name	Result	Units	MDL	Analysis Date
1,4-DICHLORBENZENE	Less Than	MG/L	0.5	05/06/2004
2,4 DINITROTOLUENE	Less Than	MG/L	0.1	05/06/2004
HEXACHLOROBENZENE	Less Than	MG/L	0.1	05/06/2004
HEXACHLOROETHANE	Less Than	MG/L	0.5	05/06/2004
NITROBENZENE	Less Than	MG/L	0.5	05/06/2004
PYRIDINE	Less Than	MG/L	1.0	05/06/2004
HEXACHLOROBUTADIENE	Less Than	MG/L	0.5	05/06/2004
O-CRESOL	Less Than	MG/L	10	05/06/2004
M-CRESOL	Less Than	MG/L	10	05/06/2004
P-CRESOL	Less Than	MG/L	10	05/06/2004
PENTACHLOROPHENOL	Less Than	MG/L	10	05/06/2004
2,4,5 TRICHLOROPHENOL	Less Than	MG/L	10	05/06/2004
2,4,6 TRICHLOROPHENOL	Less Than	MG/L	1	05/06/2004

TCLP METALS--RCRA/MDNR LIST

Analyte Name	Result	Units	MDL	Analysis Date
ARSENIC	Less Than	MG/L	0.16	05/06/2004
SILVER	Less Than	MG/L	0.06	05/06/2004
BARIUM	2.3	MG/L	0.032	05/06/2004
BERYLLIUM	Less Than	MG/L	0.08	05/06/2004
CADMIUM	Less Than	MG/L	0.06	05/06/2004
CHROMIUM	Less Than	MG/L	0.12	05/06/2004
COPPER	0.20	MG/L	0.16	05/06/2004
NICKEL	0.16	MG/L	0.08	05/06/2004
LEAD	Less Than	MG/L	0.24	05/06/2004
ANTIMONY	Less Than	MG/L	0.15	05/06/2004
SELENIUM	Less Than	MG/L	0.20	05/06/2004
THALLIUM	Less Than	MG/L	0.16	05/06/2004
ZINC	2.0	MG/L	0.08	05/06/2004
MERCURY	Less Than	MG/L	0.005	05/06/2004

TCLP ZHE CONSTITUENTS

Analyte Name	Result	Units	MDL	Analysis Date
1,4-DICHLORBENZENE	Less Than	MG/L	0.1	05/06/2004
MEK	Less Than	MG/L	0.1	05/06/2004
CHLOROFORM	Less Than	MG/L	0.1	05/06/2004
BENZENE	Less Than	MG/L	0.1	05/06/2004
CARBON TETRACHLORIDE	Less Than	MG/L	0.1	05/06/2004
1,2-DICHLOROETHANE	Less Than	MG/L	0.1	05/06/2004
1,1-DICHLOROETHYLENE	Less Than	MG/L	0.2	05/06/2004
VINYL CHLORIDE	Less Than	MG/L	0.1	05/06/2004
TRICHLOROETHYLENE	Less Than	MG/L	0.09	05/06/2004
TETRACHLOROETHYLENE	Less Than	MG/L	0.05	05/06/2004
CHLOROBENZENE	Less Than	MG/L	0.05	05/06/2004

Validated By:

Brian Lindman
Laboratory Manager

EQ Tracking #_____

WASTE CHARACTERIZATION REPORT

TO EXPEDITE YOUR WASTE APPROVAL, PLEASE COMPLETE THIS FORM ENTIRELY

Please Choose One EQ Management Facility

☒ **Michigan Disposal Waste Treatment Plant** (Stabilization and Treatment)	49350 N. I-94 Service Drive, Belleville, MI 48111 Phone: 800-592-5489 Fax: 800-592-5329	EPA ID # MID 000 724 831
☐ **Wayne Disposal, Inc. Site #2 Landfill** (Hazardous & Chemical Waste Landfill)	49350 N. I-94 Service Drive, Belleville, MI 48111 Phone: 800-592-5489 Fax: 800-592-5329	EPA ID # MID 048 090 633
☐ **EQ Resource Recovery, Inc.** (Solvent Recycling, Fuel Blending, WW Treatment)	36345 Van Born Road, Romulus, MI 48174 Phone: 866-373-8357 Fax: 734-326-4033	EPA ID # MID 060 975 844
☐ **EQ Transfer & Processing** (Drum Transfer/Non-Hazardous Waste Processing)	1010 Old Rawsonville Rd., Ypsilanti, MI 48198 Phone: 734-547-1000 Fax: 734-480-9195	EPA ID # MIR 000 033 969
☐ **EQ Indianapolis** (Drum Transfer/Non-Hazardous Waste Processing)	4000 West 10th Street, Indianapolis, IN 46222 Phone: 317-247-7160 Fax: 317-247-7170	EPA ID # IND 161 049 309
☐ **EQ Atlanta** (Drum Transfer/Non-Hazardous Waste Processing)	5600 Fulton Industrial Blvd South, Atlanta, GA 30336 Phone: 404-494-3520 Fax: 404-494-3560	EPA ID # MI0 000 131 292

Section 1 – Generator & Customer Information

SIC # ____

Generator EPA ID # MID005354386

Generator Wolverine Gasket

Facility Address 2638 Princess

City Inkster State MI Zip

County _____

Mailing Address (if different) SAME

City _____ State _____ Zip _____-____

Generator Contact Dougy Rommeck

Title _____

Phone _____ Fax _____

EQ Customer No. 3340

Invoicing Company EMA

Address 10627 Midwest Ind. Blvd.

City St. Louis State MO Zip 63132

Country _____

Invoicing Contact Dan Giesler

Phone 314-785-6425 Fax 314-785-6426

Technical Contact Pete Benoist

Phone 314-785-6425 Fax 314-785-6426

Section 2 – Shipping & Packaging Information

2.1) Shipping Volume 2-4
Shipping Frequency ☐ One Time Only ☒ Annual

2.2) DOT Shipping Name Non-RCRA/Non-DOT Regulated

Density _____ lbs./gallon or lbs./cubic yard (or) Specific Gravity _____.

2.3) Packaging **(check all that apply)**
- ☐ Bulk Solid (Yd^3 < 2000 lbs/yd^3)
- ☒ Bulk Solid (Ton >2000 lbs/yd^3)
- ☐ Bulk Liquids (Gallon)
- ☐ Cubic Yard Boxes/Bags
- ☐ Drums
- ☐ Other (palletized, 5 gal. Pail, etc.) _____

Quoted bulk disposal charges for solid materials will be billed by the cubic yard, if the waste density is less than 2,000 lbs./cy. If waste density is greater than 2,000 lbs./cy, then bulk disposal charges will be billed by the ton, regardless of the approved container.

Section 3 – Physical Characteristics

Waste Common Name: Soil

3.1) Color brown
3.2) Odor mild
3.3) Physical State at 70°F **(check all that apply)**
☒ Solid ☐ Dust ☐ Liquid ☐ Sludge

3.4) Does this waste contain? **(check all that apply)**
☐ Free Liquids ☐ Biodegradable Sorbants ☐ Powders
☐ Metal Fines ☐ Oily Residue ☒ None

3.5) Does this waste contain? **(check all that apply)**
☐ Asbestos – friable ☐ Pyrophoric Waste
☐ Asbestos – non-friable ☐ Reactive Waste
☐ Dioxins ☐ Shock Sensitive Waste
☐ Furans ☐ Radioactive Waste
☐ Biohazard ☐ Explosives
☒ None

3.6) Describe the composition of the waste (i.e. key chemical compounds, soil, water, ppe, debris, etc.)

Soil	95 to 99%
Lactol	2 to 10%
_____	____ to ____%
_____	____ to ____%
Total = 100%	

3.7) Does this waste contain >50% contaminated soil? ☐ Yes ☒ No

3.8) Does this waste contain >50% debris by volume? ☐ Yes ☒ No
(Debris is greater than 2.5 inches in size.)

MI0012794

Section 4 – Generating Process and Regulatory Information

4.1) Provide a *detailed* description of the process (es) generating this waste (attach flow diagram if available).
Soil from a spill cleanup of Lactol Solvent. Constituents of the Lactol were low. Sample was provided

Based upon RCRA waste regulations (40 CFR 261) and Michigan Act 451 Rules: Waste Code (s)

4.2) Is this an **EPA RCRA** listed hazardous waste (F, K, P or U)? ☐ Yes ☒ No ____

4.3) Is this a **MICHIGAN** hazardous waste (Other than RCRA)? ☐ Yes ☒ No ____

4.4) Is this a **MICHIGAN** non-hazardous liquid industrial waste? ☐ Yes ☒ No ____

4.5) Is this a **UNIVERSAL** waste? ☐ Yes ☒ No

4.6) Does this waste exceed **LDR** treatment standards? ☐ Yes ☒ No

4.7) Is this an **EPA RCRA** characteristic hazardous waste (D001-D043)? ☐ Yes ☒ No ____

4.8) What is the flash point of this waste? ☐ <90^{0}F ☐ 90-140^{0}F ☐ 140-199^{0}F ☒ >200^{0}F

4.9) Is the waste an oxidizer? ☐ Yes ☒ No

4.10) What is the pH of this waste? ☐ ≤2 ☐ 2-4.9 ☒ 5-10 ☐ 10.1-12.4 ☐ ≥12.5

4.11) Does this waste contain reactive cyanide ≥ 250 ppm? ☐ Yes ☒ No

4.12) Does this waste contain reactive sulfide ≥ 500 ppm? ☐ Yes ☒ No

4.13) Is the waste surcharge exempt? ☐ Yes ☒ No

Code		Regulatory Level TCLP (mg/l)	Concentration (if above)	Code		Regulatory Level TCLP (mg/l)	Concentration (if above)
D004	Arsenic	5	☒ Below ☐ Above ____	D024	m-Cresol	200	☒ Below ☐ Above ____
D005	Barium	100	☒ Below ☐ Above ____	D025	p-Cresol	200	☒ Below ☐ Above ____
D006	Cadmium	1	☒ Below ☐ Above ____	D026	Cresols	200	☒ Below ☐ Above ____
D007	Chromium	5	☒ Below ☐ Above ____	D027	1,4-Dichlorobenzez	7.5	☒ Below ☐ Above ____
D008	Lead	5	☒ Below ☐ Above ____	D028	1,2-Dicholoroethane	0.5	☒ Below ☐ Above ____
D009	Mercury	0.2	☒ Below ☐ Above ____	D029	1,1-Dichloroethylene	0.7	☒ Below ☐ Above ____
D010	Selenium	1	☒ Below ☐ Above ____	D030	2,4-Dinitirotoluene	0.13	☒ Below ☐ Above ____
D011	Silver	5	☒ Below ☐ Above ____	D031	Heptachlor	0.008	☒ Below ☐ Above ____
D012	Endrin	0.02	☒ Below ☐ Above ____	D032	Hexachlorobenzene	0.13	☒ Below ☐ Above ____
D013	Lindate	0.4	☒ Below ☐ Above ____	D033	Hexachlorobutadiene	0.5	☒ Below ☐ Above ____
D014	Methoxychlor	10	☒ Below ☐ Above ____	D034	Hexachloroethane	3.0	☒ Below ☐ Above ____
D015	Toxaphene	0.5	☒ Below ☐ Above ____	D035	Methyl Ethyl Ketone	200	☒ Below ☐ Above ____
D016	2,4-D	10	☒ Below ☐ Above ____	D036	Nitrobenzene	2	☒ Below ☐ Above ____
D017	2,4,5-TP (Silvex)	1	☒ Below ☐ Above ____	D037	Pentachlorophenol	100	☒ Below ☐ Above ____
D018	Benzene	0.5	☒ Below ☐ Above ____	D038	Pyridine	5	☒ Below ☐ Above ____
D019	Carbon Tetrachloride	0.5	☒ Below ☐ Above ____	D039	Tetrachloroethylene	0.7	☒ Below ☐ Above ____
D020	Chlordane	0.03	☒ Below ☐ Above ____	D040	Trichloroethylene	0.5	☒ Below ☐ Above ____
D021	Chlorobenzene	100	☒ Below ☐ Above ____	D041	2,4,5-Trichlorophenol	400	☒ Below ☐ Above ____
D022	Chloroform	6.0	☒ Below ☐ Above ____	D042	2,4,6-Trichlorophenol	2	☒ Below ☐ Above ____
D023	o-Cresol	200	☒ Below ☐ Above ____	D043	Vinyl Chloride	0.2	☒ Below ☐ Above ____

4.14) The hazardous constituent information is based on: ☐ Analysis (Please attach for review) ☒ Generator Knowledge ☐ Both

4.15) If this is a characteristic (D-coded) hazardous waste, does it contain underlying hazardous constituents (List in Section 5)? ☐ Yes ☐ No ☒ N/A

Section 5 – Constituent Information

Review the following items in the EQ Resource Guide and indicate their concentrations below:
1) **MVOC** (Michigan Volatile Organic Compounds) 2) **CCVOC** (Subpart CC Volatile Organic Compounds)
3) **UHC** (Underlying Hazardous Constituents 4) **TRI** (Toxic Release Inventory Constituents)
Indicate **all** constituents in your waste stream, their concentrations, and circle Yes or No for UHC:

UHC?	
☐ Yes ☐ No	
☐ Yes ☐ No	
☐ Yes ☐ No	

UHC?	
☐ Yes ☐ No	
☐ Yes ☐ No	
☐ Yes ☐ No	

MI0012795

Section 6 – PCB & TSCA Information

6.1) What is the concentration of PCBs in the waste? ☒ None ☐ 0-5 ppm ☐ 6-49 ppm ☐ 50-499 ppm ☐ 500+ ppm

6.2) Does the waste contain PCB contamination from a source with a concentration ≥ 50 ppm? ☐ Yes ☒ No

6.3) Does this waste contain free liquids? (Use paint filter test) ☐ Yes ☒ No

6.4) Has this waste been processed into a non-liquid form? ☐ Yes ☒ No

If yes, what was the concentration of PCBs prior to processing? ☒ N/A ☐ 0-499 ppm ☐ 500+ ppm

6.5) Is the non-liquid PCB waste in the form of soil, rags, debris, or other contaminated media? ☐ Yes ☒ No

6.6) Are you a PCB capacitor manufacturer or a PCB equipment manufacturer? ☐ Yes ☒ No

6.7) Has the PCB Article (e.g., transformer, hydraulic machine, PCB-contaminated electrical equipment) been drained/flushed of all PCBs and decontaminated in accordance with 40 CFR 761.60(b)? ☒ N/A ☐ Yes ☐ No

Section 7 – Benzene NESHAP Information

NESHAP SIC CODES		
2812	2836	2875
2813	2841	2879
2816	2842	2891
2819	2843	2892
2821	2844	2893
2822	2851	2895
2823	2861	2899
2824	2865	2911
2833	2869	3312
2834	2873	4953
2835	2874	9511

7.1) Does this waste stream contain Benzene? (if "no" to 7.1, please skip to Section 8) ☐ Yes ☒ No

7.2) Does the waste stream come from a facility with one of the SIC codes listed under NESHAP? ☐ Yes ☒ No

7.3) Does your company manage wastes from facilities with Total Annual Benzene (TAB) ≥10 Mg/year? ☐ Yes ☒ No

➨ ***If you answered "NO" to question 7.2 AND 7.3, please skip to Section 8.***

7.4) Does the waste contain >10% water? ☐ Yes ☒ No

7.5) What is the TAB quantity for your facility? _____ Mg/Year

7.6) Does the waste contain >1.0 mg/kg total Benzene? ☐ Yes ☒ No

7.7) What is the total Benzene concentration in your waste? _____ Percent or _____ ppmw.
(Do not use TCLP analytical results. Acceptable laboratory methods include 8020, 8240, 8260, 602 and 624.)

Section 8 – Waste Constituent Information

➨ **Complete for Michigan Disposal Waste Treatment Plant, Wayne Disposal, and EQT&P**

8.1) Does this waste contain any "Potentially Odorous Constituents" as defined in the EQ Resource Guide? ☐ Yes ☒ No

8.2) Does this waste contain any MVOC constituents as defined in the EQ Resource Guide? ☐ Yes ☒ No

8.3) Is this waste subject to Subpart CC regulation (i,e., contain >500 ppm (VOCs) Volatile Organic Compounds)? ☐ Yes ☒ No

➨ If 8.1, 8.2, or 8.3 is "yes" – please indicate the constituents and their concentrations in the table provided in Section 5.

Section 9 – Reclamation/Recycling/Fuel Blending

➨ Complete for EQ Resource Recovery ONLY.

9.1) Heat value (BTU/lb.) _____ Chlorine (%) _____ Water (%) _____ Solids (%) _____

9.2) Is this material a recoverable petroleum product? ☐ Yes ☒ No

9.3) Is this material for waste water treatment? ☐ Yes ☒ No

➨ If you answered 9.2 or 9.3 "yes" – please attach the **Wastewater Addendum Form** found in the EQ Resource Guide.

Section 10 – Certification

I certify that all information (including attachments) is complete and factual and is an accurate representation of the known and suspected hazards, pertaining to the waste described herein. I authorize EQ's Resource Team to add supplemental information to the waste approval file, provided I am contacted and give verbal permission. I authorize EQ's Resource Team to obtain a sample from any waste shipment for purposes of verification and confirmation.

Generator Signature [signature] Printed Name Douglas Rommeck

Company Englefisher Auto Title Division Environmental Mgr Date 10/6/03

The generator's signature MUST appear on the EQ Waste Characterization Report. If the generator has authorized a third party to certify this document, a written notice (on generator letterhead) must accompany this submittal. Although the EQ Resource Team is authorized to make certain modifications to the information provided on this form, the addition or removal of waste codes and waste constituents must be documented by the generator.

MI0012796

STANDARD TERMS AND CONDITIONS

Any agreement between the Customer and EQ – The Environmental Quality Company and/or its member companies (hereinafter "EQ") shall in all respects be governed by and shall be construed in accordance with the laws of the State of Michigan applied to contracts executed and performed wholly within such state.

EQ Waste Approvals and Quotations include the following Standard Terms and Conditions. Parties may use their respective standard forms (such as purchase orders, acknowledgments of orders, and invoices) to administer their dealings for convenience purposes, but all provisions thereof in conflict with these terms and conditions shall be deemed stricken.

Control of Operations
EQ shall have sole control over all aspects of the operation of the Waste management Facility, including, but not limited to, the receipt, handling, treatment, and disposal of waste materials in compliance with all applicable laws, rules and regulations of federal and state governments. EQ does not make any guarantee that it will accept, receive, handle, treat, or dispose of any waste material or any particular quantity or type of waste material. EQ reserves the right to decline the acceptance, receipt, handling, treatment, or disposal of waste materials.

Permits/Licenses
EQ, the Customer, and the Generator shall have all permits, licenses, or any other authorizations required under Environmental Requirements in the jurisdiction in which each facility is located, or under any applicable law necessary to allow the Waste Management Facility to accept, for treatment and/or disposal, the Acceptable Wastes described in the Waste Approval and Quotation form.

Customer Warranties
The information set forth in the Waste Characterization Report, other documents which include data provided during the technical approval process, the manifest, placards or labels associated with any Delivered Wastes received, handled, treated, or disposed of shall be true, complete, and correct. All Delivered Wastes tendered or delivered by or on behalf of the Customer shall BE Acceptable Wastes and shall conform in all material respects to the description and specifications contained in the Waste Characterization Report and any other information that was provided during the technical approval process. All of the Waste Materials to be disposed of shall have been generated by the Generator listed on the Waste Approval and/or Quotation and shall not have originated from the operations of any entity other than the Generator. Customer shall hold clear title, free of all liens, claims, encumbrances and charges to the Waste Materials until the Acceptable Wastes are delivered and accepted by EQ.

Non-Conforming Wastes
In the event that it is discovered that any Delivered Wastes shipped to EQ by or on behalf of the Customer are unapproved wastes purporting to be Approved Wastes, do not conform to the technical approval process and written acceptance, with any associated manifest, or with other shipping papers associated with such shipment, EQ may revoke its acceptance thereof. If the Customer does not direct an alternative treatment and/or disposal, EQ may return any such unapproved and/or non-conforming wastes to the Customer, and the Customer shall accept the return of any such shipment. Customer shall reimburse EQ for all costs and expenses incurred in connection with the receipt, handling, sampling, analyses, transportation, and return of the shipment. If in EQ's sole judgment, it is impossible or impractical to return the shipment to the Customer, the Customer shall reimburse EQ for all costs, of any type or nature whatsoever, incurred because such Delivered Wastes were unapproved and/or non-conforming, including, but not limited to, all costs associated with any remedial steps necessary in connection with material with which the non-conforming shipment may have been commingled.

Identification
The Customer and EQ shall indemnify, defend, and hold harmless each other, and each other's affiliated or related companies, and all of their respective present or future officers, directors, shareholders, employees, and agents from and against any and all losses, damages, liabilities, penalties, fines, forfeitures, demands, claims, causes of actions, suits, costs and expenses (including, but not limited to, reasonable costs of defense, settlement and attorneys' fees), which any or all of them may hereafter suffer, incur, be responsible for or pay out, as a result of or in connection with bodily injuries (including, but not limited to, death, sickness, disease and emotional or mental distress) to any person, damage (including, but not limited to, loss of use) to any property (public or private), contamination of or adverse effects on the environment, or any violation or alleged violation of any statues, ordinances, orders, rules or regulations of any governmental entity or agency, caused by or arising out of (i) a breach of this Agreement by the Customer or (ii) any willful or negligent act or omission of the Generator, Customer, or their subcontractors, employees, or agents in connection with the performance of this Agreement.

Force Majeure
EQ shall not be liable for any failure to accept, receive, handle, treat, and/or dispose of Waste Products due to an act of God, fire, casualty, flood, war, strike, lockout, labor trouble, failure of public utilities, equipment failure, facility shutdown, injunction, accident, epidemic, riot, insurrection, destruction of operation or transportation facilities, the inability to procure materials, equipment, or sufficient personnel or energy in order to meet operational needs without the necessity of allocation, the failure or inability to obtain any governmental approvals or to meet Environmental Requirements (including, but not limited to voluntary or involuntary compliance with any act, exercise, assertion, or requirement of any governmental authority) which may temporarily or permanently prohibit operations of EQ, the Customer, or the Generator, or any other circumstances beyond the control of EQ which prevents or delays performance of any of its obligations under this quotation.

MI0012797

WASTE MANAGEMENT DIVISION
MICHIGAN DEPARTMENT OF
ENVIRONMENTAL QUALITY

DO NOT WRITE IN THIS SPACE
ATT. ☐ DIS. ☐ REJ. ☐ PR. ☐

Required under authority of Part 111 and Part 121 of Act 451, 1994, as amended.
Form 106
Failure to file may subject you to criminal and/or civil penalties under Sections 324.11151 or 324.12116 MCL.

Please print or type.

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. MID005354386
Manifest Document No.
2. Page 1 of 1
Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
WOLVERINE GASKET & MFG
2630 PRINCESS
INKSTER, MI 48141
4. Generator's Phone (517) 610-1130 DOUG ROMMECK

A. State Manifest Document Number MI 9757375
B. State Generator's ID

5. Transporter 1 Company Name S&C
6. US EPA ID Number MIR000039701
C. State Transporter's ID
D. Transporter's Phone 734-200-0005

7. Transporter 2 Company Name
8. US EPA ID Number
E. State Transporter's ID
F. Transporter's Phone

9. Designated Facility Name and Site Address
MICHIGAN DISPOSAL WASTE TREATMENT PLANT
49350 NORTH I94 SERVICE DRIVE
BELLEVILLE, MICHIGAN 48111
10. US EPA ID Number MID000724831
G. State Facility's ID
H. Facility's Phone 800-592-5489

	11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID NUMBER).	HM	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	NON RCRA/NON DOT REGULATED SOLIDS	☐	001	DT	[illegible]	P	SLUD
b.		☐					
c.		☐					
d.		☐					

J. Additional Descriptions for Materials Listed Above
APPROVAL# 11A 101004TBB (CONTAMINATED SOIL)

K. Handling Codes
a
b
c
d

15. Special Handling Instructions and Additional Information

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR; if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: Douglas Rommeck
Signature: [signature]
Date: Month 10 Day 27 Year 04

TRANSPORTER

17. Transporter 1 Acknowledgment of Receipt of Materials
Printed/Typed Name
Signature
Date: Month Day Year

18 Transporter 2 Acknowledgment of Receipt of Materials
Printed/Typed Name
Signature
Date: Month Day Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: Mark Klein
Signature: [signature]
Date: Month 10 Day 27 Year 04

ALL SPILLS MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHIGAN AT 1-800-292-4706 OR OUT OF STATE AT 517-373-7660 AND THE NATIONAL RESPONSE CENTER AT 1-800-424-8802 24 HOUR PER DAY.

GENERAL INSTRUCTIONS

Read all instructions before completing this form. This form has been designed for use on a 12-pitch (elite) typewriter/computer printer; a firm point pen may also be used - press down hard. Ensure all copies are legible.

Federal and state regulations require generators and transporters of hazardous waste and owners or operators of hazardous waste treatment, storage, and disposal facilities to use this form (8700-22) and, if necessary, the continuation sheet (Form 8700-22A) for both inter- and intrastate transportation of hazardous waste as defined in 40 CFR and Part 111 of Act 451 of 1994, as amended (Part 111). State regulations also require the use of this manifest for all regulated shipments of liquid industrial waste as required in Part 121 of Act 451 of 1994, as amended (Part 121).

Federal and State regulations provide for additional requirements, not included in these instructions, regarding the use and management of this form (40 CFR, 49 CFR, Part 111, Part 121).

Additional information such as "Rejected Load Procedures", state assigned identification numbers, manifest forms, etc., can be obtained by contacting the Michigan Department of Environmental Quality (MDEQ), Waste Management Divisions (WMD) Internet Home Page at http://www.deq.state.mi.us/wmd or you may contact the Manifest Unit directly at (517) 373-1217. Continuation sheets are not supplied by MDEQ.

Complete all items on the manifest. Enter "N/A" if any item does not apply. Leave items that may be needed later blank, such as a second transporter.

Item 1. Enter the generator's U.S. EPA twelve digit identification number. For Part 121 manifested shipments where a generator does not have a U.S. EPA assigned number, a state assigned number must be obtained and used. The generator of the waste must enter a unique five digit manifest document number (e.g. 00001).

Item 2. Page number 1 of 1 should be recorded unless a continuation sheet is used, in which case the total number of pages, counting the initial manifest page, should be shown.

Item 3. Enter the name of the generator and the mailing address to which the manifest should be mailed. If the address of the site at which the waste was placed into transportation is different from the mailing address record the site address in Item J.

Item 4. Enter a telephone number (including area code) where an authorized agent of the generator can be reached in the event of an emergency and/or a partial or total rejected load.

NOTE: The 24 hour emergency phone number required for a hazardous materials shipping paper may be different from the generator's phone number.

Item 5. Enter the company name of the first transporter who will transport the waste.

Item 6. Enter the transporter's U.S. EPA twelve digit identification number. For Part 121 manifested shipments where a transporter does not have a U.S. EPA assigned number, a state assigned number is to be used.

Item 7. If using a second transporter, enter the company name.

Item 8. Enter the second transporter's U.S. EPA twelve digit identification number. For Part 121 manifested shipments where a transporter does not have a U.S. EPA assigned number, a state number is to be used.

NOTE: If more than two transporters are used, the generator or third transporter shall initiate a continuation sheet. In Item L of the continuation sheet, the generator/transporter must copy the State manifest document number listed in Item A. Every transport company used between the generator and the designated facility (except for intermediate rail or barge transporters used between the initial rail or barge carriers and the designated facility) must be listed. This is not intended to require multiple signatures for individual drivers working for one transporter. Item 2 is to be changed to reflect the added page(s). Continuation sheets must be appropriately completed in their entirety and properly distributed. Continuation sheets may not be used to list additional waste streams.

Item 9. Enter the company name and site address of the facility designated to receive the waste listed on this manifest.

Item 10. Enter the U.S. EPA twelve digit identification number for the designated facility described in Item 9. For Part 121 manifested shipments where a designated facility does not have a U.S. EPA assigned number, a state assigned number is to be used.

Item 11. Enter an X in the HM box if the waste is a hazardous material regulate by U.S. DOT (See 49 CFR 172). Enter the required U.S. DOT shipping description, including Proper Shipping Name, Hazard Class or Division, ID Number (UN/NA), and packing group for each waste as identified in 49 CFR 172. Additional information may also be required in this space, including technical name and reportable quantity references. For only Part 121 regulated wastes include an appropriate shipping description for the waste stream.

Item 12. Enter the number of containers for each waste and the appropriate abbreviations listed below for the type of container. Each container type requires separate entry.

DM = Metal drums, barrels, kegs	CY = Cylinders
DW = Wooden drums, barrels, kegs	CM = Metal boxes, cartons, cases (including roll-offs)
DF = Fiberboard or plastic drums, barrels, kegs	CW = Wooden boxes, cartons, cases
DT = Dump truck	CF = Fiber or plastic boxes, cartons, cases
TP = Tanks, portable	BA = Burlap, cloth, paper / plastic bags
TT = Cargo tanks (tank trucks)	
TC = Tank cars	

Item 13. Enter the total quantity of waste described on each line. Do not use decimals or fractions.

Item 14. Enter the appropriate abbreviation for the unit of measure listed below.

G = Gallons (liquids only)	L = Liters (liquids only)
P = Pounds	K = Kilograms
T = Tons (2000 lbs.)	M = Metric tons (1000 kg)
Y = Cubic yards	N = Cubic meters

Item 15. The generator may use this space to indicate special transportation, treatment, storage or disposal information. Import/Export information as noted in the "International Shipment" instructions section is to be recorded here.

Item 16. The generator must read, print his/her name, sign and date the certification statement.

Item 17. Print the name of the person accepting the waste on behalf of the first transporter. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

Item 18. If applicable, print the name of the person accepting the waste on behalf of the second transporter. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

Item 19. An authorized representative of the designated (or alternate) facility must note in this space any discrepancy in the waste shipment.

Item 20. Print the name of the person accepting the waste on behalf of the designated facility. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

NOTE: MDEQ "Rejected Load Procedures" provides guidance for partial or total load rejections.

Only the following information in the shaded area is a State of Michigan requirement:

Item A. A preprinted State manifest document number.

Item B - H. May be required by other states.

Item I. For hazardous wastes, enter the appropriate waste numbers found in R299.9212 through R299.9214 of Part 111 and 40 CFR 261 Subparts C and D. If more than one waste number is required to appropriately identify the waste, enter the additional numbers in Item J. In selecting the most appropriate waste number the following hierarchy must be used: acute waste (including P and acute F), U (toxic), K (specific sources), non-acute F (non-specific sources) and D (characteristic). State regulated wastes follow the same hierarchy as federally regulated wastes. For Part 121 wastes which are not hazardous wastes enter the appropriate code listed below.

Mixed Solvents	007L	Storm Sewer Cleanouts	031L
Pharmaceutical	014L	Sanitary Sewer Cleanouts	032L
Crankcase Oil	017L	X-Ray/Photo Solutions	033L
Coolants and Water Soluble Oils	019L	Water Based Cleaning Solutions	034L
Other Oil (Describe in Item 11 or Item J)	021L	Car Wash Sludges	035L
Brine	022L	Grease Trap Wastes	036L
PCB	026L		
Other Wastes (Describe in Item 11 or Item J)	029L		
Antifreeze	030L		

Item J. Generators are to use this space for the site address if different from the mailing address noted in Item 3, additional waste codes, additional description for a Part 121 waste as noted in Item I of these instructions, approval of commingling authority as required in R299.9304(6).

Item K. List any specific codes which apply.

Burned for Energy Recovery	B
Conditionally Exempt Small Quantity Generator	C
Emergency Response Cleanup	E
Household Generated	H
Recycled Precious Metals	P
Recycled, Reclaimed, Used or Reused	R
Universal Waste	U

INTERNATIONAL SHIPMENTS

Exports- Transporters must sign and enter the date the waste leaves the United States in Item 15. The primary exporter must identify the point of departure from the United States.*

Imports- Shipments of hazardous and Part 121 regulated wastes must be accompanied by a U.S. EPA Uniform Hazardous Waste Manifest. Any person functioning as the U.S. importer, as defined in Part 111, must complete the manifest as required in R299.9310*

*Transporters of hazardous waste shipments must deliver a copy of the manifest to U.S. Customs when importing or exporting the waste across U.S. borders. Record the foreign waste manifest document number in Item J.

MANIFEST DISTRIBUTION

GENERATOR: Upon placing the waste into transportation (first transporter signs and dates manifest) remove the white and gold banded copies and give the remainder of the manifest copies to the transporter. Sent the white copy to MDEQ no later than the tenth day of the month following the shipment. For shipments of wastes being transported to a designated facility outside of Michigan when an out-of-state manifest is used, mail to the MDEQ a photocopy of the manifest when the shipment is placed into transportation and mail a photocopy of the second generator manifest copy, when received.

TRANSPORTER: Upon delivery to the designated (or alternate) facility, and that facility signs and dates the manifest, the canary banded copy will be returned to you. If more than one transporter is used, the manifest is to be copied and supplied to the previous transporter acknowledging the receipt of the shipment by the next transporter. The canary banded copy stays with the manifest until the shipment reaches the designated facility.

DESIGNATED FACILITY: Upon signing and dating the manifest as received, give the canary banded

ADDRESS ALL MDEQ MANIFEST COPIES TO:
WASTE MANAGEMENT DIVISION
MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
PO BOX 30038
LANSING MI 48909-7538

The public reporting burden for this collection of information is estimated to average 31 minutes for generators, 16 minutes for transporters, and 16 minutes for treatments, storage and disposal facilities. The record-keeping burden per response for this collection of information is estimated to average 6 minutes for generators, 5 minutes for transporters, and 6 minutes for treatment, storage and disposal facilities. The burden associated with reading the regulations is estimated at 1 hour and 15 minutes annually. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency.

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB numbers for EPA's regulations are listed in 40 CFR Part 9 and 48 CFR Chapter 15. Send comments regarding these burden statements or any other aspect of this collection, including suggestions for reducing the burden, including through use of automated collection techniques to the Director, OPPE Regulatory Information Division, U.S. Environmental Protection Agency (2 37), 401 M St., S.W., Washington, D.C., 20460 and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Attention: Desk Officer for EPA, 725 17th Street, N.W., Washington, D.C. 20503. Include the OMB control number in any correspondence.

WASTE MANAGEMENT DIVISION
MICHIGAN DEPARTMENT OF
ENVIRONMENTAL QUALITY

DO NOT WRITE IN THIS SPACE
ATT. ☐ DIS. ☐ REJ. ☐ PR. ☐

Required under authority of Part 111 and Part 121 of Act 451, 1994, as amended.

Failure to file may subject you to criminal and/or civil penalties under Sections 324.11151 or 324.12116 MCL.

Please print or type.

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. MID005354386

Manifest Document No.

2. Page 1 of 1

Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
WOLVERINE GASKET & MFG
2638 PRINCESS
INKSTER, MI 48141

4. Generator's Phone ( ) 517 610-1128 DOUG ROMMECK

A. State Manifest Document Number MI 9757375

B. State Generator's ID

5. Transporter 1 Company Name S&C

6. US EPA ID Number MIR000039701

C. State Transporter's ID

D. Transporter's Phone 734 [illegible]

7. Transporter 2 Company Name

8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address
MICHIGAN DISPOSAL WASTE TREATMENT PLANT
49350 NORTH I94 SERVICE DRIVE
BELLEVILLE, MICHIGAN 48111

10. US EPA ID Number MID000724831

G. State Facility's ID

H. Facility's Phone 800-592-5489

	HM	11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID NUMBER).	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	☐	NON RCRA/NON DOT REGULATED SOLIDS	001	DT		P	SLUD
b.	☐						
c.	☐						
d.	☐						

J. Additional Descriptions for Materials Listed Above
APPROVAL# 11A 101904TBH (CONTAMINATED SOIL)

K. Handling Codes
a
b
c
d

15. Special Handling Instructions and Additional Information

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR; if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: Douglas Rommeck
Signature: [signature]
Date: Month 10 Day 17 Year 04

17. Transporter 1 Acknowledgment of Receipt of Materials
Printed/Typed Name
Signature
Date: Month Day Year

18 Transporter 2 Acknowledgment of Receipt of Materials
Printed/Typed Name
Signature
Date: Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: [illegible]
Signature: [signature]
Date: Month 10 Day 20 Year 04

GENERATOR

TRANSPORTER

FACILITY

ALL SPILLS MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHIGAN AT 1-800-292-4706 OR OUT OF STATE AT 517-373-7660 AND THE NATIONAL RESPONSE CENTER AT 1-800-424-8802 24 HOUR PER DAY.

EPA Form 8700-22 (Rev. 9/88)

GENERATOR 1st COPY

EQP 5110
Rev. 7/03

MI0012800

GENERAL INSTRUCTIONS

Read all instructions before completing this form. This form has been designed for use on a 12-pitch (elite) typewriter/computer printer; a firm point pen may also be used - press down hard. Ensure all copies are legible.

Federal and state regulations require generators and transporters of hazardous waste and owners or operators of hazardous waste treatment, storage, and disposal facilities to use this form (8700-22) and, if necessary, the continuation sheet (Form 8700-22A) for both inter- and intrastate transportation of hazardous waste as defined in 40 CFR and Part 111 of Act 451 of 1994, as amended (Part 111). State regulations also require the use of this manifest for all regulated shipments of liquid industrial waste as required in Part 121 of Act 451 of 1994, as amended (Part 121).

Federal and State regulations provide for additional requirements, not included in these instructions, regarding the use and management of this form (40 CFR, 49 CFR, Part 111, Part 121).

Additional information such as "Rejected Load Procedures", state assigned identification numbers, manifest forms, etc., can be obtained by contacting the Michigan Department of Environmental Quality (MDEQ), Waste Management Divisions (WMD) Internet Home Page at http://www.deq.state.mi.us/wmd or you may contact the Manifest Unit directly at (517) 373-1217. Continuation sheets are not supplied by MDEQ.

Complete all items on the manifest. Enter "N/A" if any item does not apply. Leave items that may be needed later blank, such as a second transporter.

Item 1. Enter the generator's U.S. EPA twelve digit identification number. For Part 121 manifested shipments where a generator does not have a U.S. EPA assigned number, a state assigned number must be obtained and used. The generator of the waste must enter a unique five digit manifest document number (e.g. 00001).

Item 2. Page number 1 of 1 should be recorded unless a continuation sheet is used, in which case the total number of pages, counting the initial manifest page, should be shown.

Item 3. Enter the name of the generator and the mailing address to which the manifest should be mailed. If the address of the site at which the waste was placed into transportation is different from the mailing address record the site address in item J.

Item 4. Enter a telephone number (including area code) where an authorized agent of the generator can be reached in the event of an emergency and/or a partial or total rejected load.

NOTE: The 24 hour emergency phone number required for a hazardous materials shipping paper may be different from the generator's phone number.

Item 5. Enter the company name of the first transporter who will transport the waste.

Item 6. Enter the transporter's U.S. EPA twelve digit identification number. For Part 121 manifested shipments where a transporter does not have a U.S. EPA assigned number, a state assigned number is to be used.

Item 7. If using a second transporter, enter the company name.

Item 8. Enter the second transporter's U.S. EPA twelve digit identification number. For Part 121 manifested shipments where a transporter does not have a U.S. EPA assigned number, a state number is to be used.

NOTE: If more than two transporters are used, the generator or third transporter shall initiate a continuation sheet. In Item L of the continuation sheet, the generator/transporter must copy the State manifest document number listed in Item A. Every transport company used between the generator and the designated facility (except for intermediate rail or barge transporters used between the initial rail or barge carriers and the designated facility) must be listed. This is not intended to require multiple signatures for individual drivers working for one transporter. Item 2 is to be changed to reflect the added page(s). Continuation sheets must be appropriately completed in their entirety and properly distributed. Continuation sheets may not be used to list additional waste streams.

Item 9. Enter the company name and site address of the facility designated to receive the waste listed on this manifest.

Item 10. Enter the U.S. EPA twelve digit identification number for the designated facility described in Item 9. For Part 121 manifested shipments where a designated facility does not have a U.S. EPA assigned number, a state assigned number is to be used.

Item 11. Enter an X in the HM box if the waste is a hazardous material regulate by U.S. DOT (See 49 CFR 172). Enter the required U.S. DOT shipping description, including Proper Shipping Name, Hazard Class or Division, ID Number (UN/NA), and packing group for each waste as identified in 49 CFR 172. Additional information may also be required in this space, including technical name and reportable quantity references. For only Part 121 regulated wastes include an appropriate shipping description for the waste stream.

Item 12. Enter the number of containers for each waste and the appropriate abbreviations listed below for the type of container. Each container type requires separate entry.

DM = Metal drums, barrels, kegs	CY = Cylinders
DW = Wooden drums, barrels, kegs	CM = Metal boxes, cartons, cases (including roll-offs)
DF = Fiberboard or plastic drums, barrels, kegs	CW = Wooden boxes, cartons, cases
DT = Dump truck	CF = Fiber or plastic boxes, cartons, cases
TP = Tanks, portable	BA = Burlap, cloth, paper / plastic bags
TT = Cargo tanks (tank trucks)	
TC = Tank cars	

Item 13. Enter the total quantity of waste described on each line. Do not use decimals or fractions.

Item 14. Enter the appropriate abbreviation for the unit of measure listed below.

G = Gallons (liquids only)	L = Liters (liquids only)
P = Pounds	K = Kilograms
T = Tons (2000 lbs.)	M = Metric tons (1000 kg)
Y = Cubic yards	N = Cubic meters

Item 15. The generator may use this space to indicate special transportation, treatment, storage or disposal information. Import/Export information as noted in the "International Shipment" instructions section is to be recorded here.

Item 16. The generator must read, print his/her name, sign and date the certification statement.

Item 17. Print the name of the person accepting the waste on behalf of the first transporter. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

Item 18. If applicable, print the name of the person accepting the waste on behalf of the second transporter. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

Item 19. An authorized representative of the designated (or alternate) facility must note in this space any discrepancy in the waste shipment.

Item 20. Print the name of the person accepting the waste on behalf of the designated facility. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

NOTE: MDEQ "Rejected Load Procedures" provides guidance for partial or total load rejections.

Only the following information in the shaded area is a State of Michigan requirement:

Item A. A preprinted State manifest document number.

Item B - H. May be required by other states.

Item I. For hazardous wastes, enter the appropriate waste numbers found in R299.9212 through R299.9214 of Part 111 and 40 CFR 261 Subparts C and D. If more than one waste number is required to appropriately identify the waste, enter the additional numbers in item J. In selecting the most appropriate waste number the following hierarchy must be used: acute waste (including P and acute F), U (toxic), K (specific sources), non-acute F (non-specific sources) and D (characteristic). State regulated wastes follow the same hierarchy as federally regulated wastes. For Part 121 wastes which are not hazardous wastes enter the appropriate code listed below.

Mixed Solvents	007L	Storm Sewer Cleanouts	031L
Pharmaceutical	014L	Sanitary Sewer Cleanouts	032L
Crankcase Oil	017L	X-Ray/Photo Solutions	033L
Coolants and Water Soluble Oils	019L	Water Based Cleaning Solutions	034L
Other Oil (Describe in Item 11 or Item J)	021L	Car Wash Sludges	035L
Brine	022L	Grease Trap Wastes	036L
PCB	026L		
Other Wastes (Describe in Item 11 or Item J)	029L		
Antifreeze	030L		

Item J. Generators are to use this space for the site address if different from the mailing address noted in Item 3, additional waste codes, additional description for a Part 121 waste as noted in Item I of these instructions, approval of commingling authority as required in R299.9304(6).

Item K. List any specific codes which apply.

Burned for Energy Recovery	B
Conditionally Exempt Small Quantity Generator	C
Emergency Response Cleanup	E
Household Generated	H
Recycled Precious Metals	P
Recycled, Reclaimed, Used or Reused	R
Universal Waste	U

INTERNATIONAL SHIPMENTS

Exports- Transporters must sign and enter the date the waste leaves the United States in Item 15. The primary exporter must identify the point of departure from the United States.*

Imports- Shipments of hazardous and Part 121 regulated wastes must be accompanied by a U.S. EPA Uniform Hazardous Waste Manifest. Any person functioning as the U.S. Importer, as defined in Part 111, must complete the manifest as required in R299.9310*

*Transporters of hazardous waste shipments must deliver a copy of the manifest to U.S. Customs when importing or exporting the waste across U.S. borders. Record the foreign waste manifest document number in Item J.

MANIFEST DISTRIBUTION

GENERATOR: Upon placing the waste into transportation (first transporter signs and dates manifest) remove the white and gold banded copies and give the remainder of the manifest copies to the transporter. Sent the white copy to MDEQ no later than the tenth day of the month following the shipment. For shipments of wastes being transported to a designated facility outside of Michigan when an out-of-state manifest is used, mail to the MDEQ a photocopy of the manifest when the shipment is placed into transportation and mail a photocopy of the second generator manifest copy, when received.

TRANSPORTER: Upon delivery to the designated (or alternate) facility, and that facility signs and dates the manifest, the canary banded copy will be returned to you. If more than one transporter is used, the manifest is to be copied and supplied to the previous transporter acknowledging the receipt of the shipment by the next transporter. the canary banded copy stays with the manifest until the shipment reaches the designated facility.

DESIGNATED FACILITY: Upon signing and dating the manifest as received, give the canary banded

ADDRESS ALL MDEQ MANIFEST COPIES TO:
WASTE MANAGEMENT DIVISION
MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
PO BOX 30038
LANSING MI 48909-7538

The public reporting burden for this collection of information is estimated to average 31 minutes for generators, 15 minutes for transporters, and 15 minutes for treatment, storage and disposal facilities. The record-keeping burden per response for this collection of information is estimated to average 8 minutes for generators, 6 minutes for transporters, and 6 minutes for treatment, storage and disposal facilities. The burden associated with reading the regulations is estimated at 1 hour and 15 minutes annually. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency.

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB numbers for EPA's regulations are listed in 40 CFR Part 9 and 48 CFR Chapter 15. Send comments regarding these burden statements or any other aspect of this collection, including suggestions for reducing the burden, including through use of automated collection techniques to the Director, OPPE Regulatory Information Division, U.S. Environmental Protection Agency (2.37), 401 M St., S.W., Washington, D.C., 20460 and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Attention: Desk Officer for EPA, 725 17th Street, N.W., Washington, D.C. 20503. Include the OMB control number in any correspondence.

CERTIFICATE OF DISPOSAL

This certificate is to verify the wastes specified on Manifest # MI9757375

have been properly disposed of in accordance with all local, state and federal regulations.

"Disposed of" means either: 1) Burial or 2) Processed as specified in 40 CFR et seq.

FACILITY NAME: *(Please check one)*

☑ Michigan Disposal Waste Treatment Plant (EPA I.D. # MID000724831)

☐ Wayne Disposal, Inc. (EPA I.D. # MID048090633)

ADDRESS: 49350 N. I-94 Service Drive
Belleville, Michigan 48111

PHONE NUMBER: 1-800-592-5489

FAX NUMBER: 1-800-592-5329

Authorized Signature: _____

THE ENVIRONMENTAL QUALITY COMPANY 49350 N. I-94 SERVICE DRIVE BELLEVILLE MICHIGAN 48111

FORM1020 (3/96)

MI0012802

WASTE MANAGEMENT DIVISION
MICHIGAN DEPARTMENT OF
ENVIRONMENTAL QUALITY

DO NOT WRITE IN THIS SPACE
ATT. ☐ DIS. ☐ REJ. ☐ PR. ☐

Required under authority of Part 111 and Part 121 of Act 451, 1994, as amended.
Long 106

Failure to file may subject you to criminal and/or civil penalties under Sections 324.11151 or 324.12116 MCL.

Please print or type.

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. MID005354386

Manifest Document No.

2. Page 1 of 1

Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
WOLVERINE GASKET & MFG
2638 PRINCESS
INKSTER, MI 48141

4. Generator's Phone (517) 610-1136 DOUG ROMMECK

A. State Manifest Document Number MI 9757373

B. State Generator's ID

5. Transporter 1 Company Name S&C

6. US EPA ID Number MIR000039701

C. State Transporter's ID

D. Transporter's Phone 734 285-6500

7. Transporter 2 Company Name

8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address
MICHIGAN DISPOSAL WASTE TREATMENT PLANT
49350 NORTH I94 SERVICE DRIVE
BELLEVILLE, MICHIGAN 48111

10. US EPA ID Number MID000724831

G. State Facility's ID

H. Facility's Phone 800-592-5489

	HM	11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID NUMBER).	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	☐	NON RCRA/NON DOT REGULATED SOLIDS	001	DT		P	SLUD
b.	☐						
c.	☐						
d.	☐						

J. Additional Descriptions for Materials Listed Above
APPROVAL# 11A 101904TBB (CONTAMINATED SOIL)

K. Handling Codes
a
b
c
d

15. Special Handling Instructions and Additional Information

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR; if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: Douglas Rommeck
Signature: [signature]
Date: Month 10 Day 06 Year 04

17. Transporter 1 Acknowledgment of Receipt of Materials
Printed/Typed Name: [illegible] Knox
Signature:
Date: Month Day Year

18 Transporter 2 Acknowledgment of Receipt of Materials
Printed/Typed Name
Signature
Date: Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name
Signature
Date: Month Day Year

GENERATOR

TRANSPORTER

FACILITY

ALL SPILLS MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHIGAN AT 1-800-292-4706 OR OUT OF STATE AT 517-373-7660 AND THE NATIONAL RESPONSE CENTER AT 1-800-424-8802 24 HOUR PER DAY.

EPA Form 8700-22 (Rev. 9/88) GENERATOR 2nd COPY EQP 5110 Rev. 7/03

MI0012803

GENERAL INSTRUCTIONS

Read all instructions before completing this form. This form has been designed for use on a 12-pitch (elite) typewriter/computer-printer; a firm point pen may also be used - press down hard. Ensure all copies are legible.

Federal and state regulations require generators and transporters of hazardous waste and owners or operators of hazardous waste treatment, storage, and disposal facilities to use this form (R700-22) and, if necessary, the continuation sheet (Form 8700-22A) for both inter- and intrastate transportation of hazardous waste as defined in 40 CFR and Part 111 of Act 451 of 1994, as amended (Part 111). State regulations also require the use of this manifest for all regulated shipments of liquid industrial waste as required in Part 121 of Act 451 of 1994, as amended (Part 121).

Federal and State regulations provide for additional requirements, not included in these instructions, regarding the use and management of this form (40 CFR, 49 CFR, Part 111, Part 121).

Additional information such as "Rejected Load Procedures", state assigned identification numbers, manifest forms, etc., can be obtained by contacting the Michigan Department of Environmental Quality (MDEQ), Waste Management Divisions (WMD) Internet Home Page at http://www.deq.state.mi.us/wmd or you may contact the Manifest Unit directly at (517) 373-1217. Continuation sheets are not supplied by MDEQ.

Complete all items on the manifest. Enter "N/A" if any item does not apply. Leave items that may be needed later blank, such as a second transporter.

Item 1. Enter the generator's U.S. EPA twelve digit identification number. For Part 121 manifested shipments where a generator does not have a U.S. EPA assigned number, a state assigned number must be obtained and used. The generator of the waste must enter a unique five digit manifest document number (e.g. 00001).

Item 2. Page number 1 of 1 should be recorded unless a continuation sheet is used, in which case the total number of pages, counting the initial manifest page, should be shown.

Item 3. Enter the name of the generator and the mailing address to which the manifest should be mailed. If the address of the site at which the waste was placed into transportation is different from the mailing address record the site address in item J.

Item 4. Enter a telephone number (including area code) where an authorized agent of the generator can be reached in the event of an emergency and/or a partial or total rejected load.

NOTE: The 24 hour emergency phone number required for a hazardous materials shipping paper may be different from the generator's phone number.

Item 5. Enter the company name of the first transporter who will transport the waste.

Item 6. Enter the transporter's U.S. EPA twelve digit identification number. For Part 121 manifested shipments where a transporter does not have a U.S. EPA assigned number, a state assigned number is to be used.

Item 7. If using a second transporter, enter the company name.

Item 8. Enter the second transporter's U.S. EPA twelve digit identification number. For Part 121 manifested shipments where a transporter does not have a U.S. EPA assigned number, a state number is to be used.

NOTE: If more than two transporters are used, the generator or third transporter shall initiate a continuation sheet. In Item L of the continuation sheet, the generator/transporter must copy the State manifest document number listed in Item A. Every transport company used between the generator and the designated facility (except for intermediate rail or barge transporters used between the initial rail or barge carriers and the designated facility) must be listed. This is not intended to require multiple signatures for individual drivers working for one transporter. Item 2 is to be changed to reflect the added page(s). Continuation sheets must be appropriately completed in their entirety and properly distributed. Continuation sheets may not be used to list additional waste streams.

Item 9. Enter the company name and site address of the facility designated to receive the waste listed on this manifest.

Item 10. Enter the U.S. EPA twelve digit identification number for the designated facility described in Item 9. For Part 121 manifested shipments where a designated facility does not have a U.S. EPA assigned number, a state assigned number is to be used.

Item 11. Enter an X in the HM box if the waste is a hazardous material regulate by U.S. DOT (See 49 CFR 172). Enter the required U.S. DOT shipping description, including Proper Shipping Name, Hazard Class or Division, ID Number (UN/NA), and packing group for each waste as identified in 49 CFR 172. Additional information may also be required in this space, including technical name and reportable quantity references. For only Part 121 regulated wastes include an appropriate shipping description for the waste stream.

Item 12. Enter the number of containers for each waste and the appropriate abbreviations listed below for the type of container. Each container type requires separate entry.

DM = Metal drums, barrels, kegs	CY = Cylinders
DW = Wooden drums, barrels, kegs	CM = Metal boxes, cartons, cases (including roll-offs)
DF = Fiberboard or plastic drums, barrels, kegs	CW = Wooden boxes, cartons, cases
DT = Dump truck	CF = Fiber or plastic boxes, cartons, cases
TP = Tanks, portable	BA = Burlap, cloth, paper / plastic bags
TT = Cargo tanks (tank trucks)	
TC = Tank cars	

Item 13. Enter the total quantity of waste described on each line. Do not use decimals or fractions

Item 14. Enter the appropriate abbreviation for the unit of measure listed below.

G = Gallons (liquids only)	L = Liters (liquids only)
P = Pounds	K = Kilograms
T = Tons (2000 lbs.)	M = Metric tons (1000 kg)
Y = Cubic yards	N = Cubic meters

Item 15. The generator may use this space to indicate special transportation, treatment, storage or disposal information. Import/Export information as noted in the "International Shipment" instructions section is to be recorded here.

Item 16. The generator must read, print his/her name, sign and date the certification statement.

Item 17. Print the name of the person accepting the waste on behalf of the first transporter. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

Item 18. If applicable, print the name of the person accepting the waste on behalf of the second transporter. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

Item 19. An authorized representative of the designated (or alternate) facility must note in this space any discrepancy in the waste shipment.

Item 20. Print the name of the person accepting the waste on behalf of the designated facility. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

NOTE: MDEQ "Rejected Load Procedures" provides guidance for partial or total load rejections.

Only the following information in the shaded area is a State of Michigan requirement:

Item A. A preprinted State manifest document number.

Item B - H. May be required by other states.

Item I. For hazardous wastes, enter the appropriate waste numbers found in R299.9212 through R299.9214 of Part 111 and 40 CFR 261 Subparts C and D. If more than one waste number is required to appropriately identify the waste, enter the additional numbers in item J. In selecting the most appropriate waste number the following hierarchy must be used: acute waste (including P and acute F), U (toxic), K (specific sources), non-acute F (non-specific sources) and D (characteristic). State regulated wastes follow the same hierarchy as federally regulated wastes. For Part 121 wastes which are not hazardous wastes enter the appropriate code listed below.

Mixed Solvents	007L	Storm Sewer Cleanouts	031L
Pharmaceutical	014L	Sanitary Sewer Cleanouts	032L
Crankcase Oil	017L	X-Ray/Photo Solutions	033L
Coolants and Water Soluble Oils	019L	Water Based Cleaning Solutions	034L
Other Oil (Describe in Item 11 or Item J)	021L	Car Wash Sludges	035L
Brine	022L	Grease Trap Wastes	036L
PCB	026L		
Other Wastes (Describe in Item 11 or Item J)	029L		
Antifreeze	030L		

Item J. Generators are to use this space for the site address if different from the mailing address noted in Item 3, additional waste codes, additional description for a Part 121 waste as noted in Item I of these instructions, approval of commingling authority as required in R299.9304(6).

Item K. List any specific codes which apply.

Burned for Energy Recovery	B
Conditionally Exempt Small Quantity Generator	C
Emergency Response Cleanup	E
Household Generated	H
Recycled Precious Metals	P
Recycled, Reclaimed, Used or Reused	R
Universal Waste	U

INTERNATIONAL SHIPMENTS

Exports- Transporters must sign and enter the date the waste leaves the United States in Item 15. The primary exporter must identify the point of departure from the United States.*

Imports- Shipments of hazardous and Part 121 regulated wastes must be accompanied by a U.S. EPA Uniform Hazardous Waste Manifest. Any person functioning as the U.S. Importer, as defined in Part 111, must complete the manifest as required in R299.9310*

*Transporters of hazardous waste shipments must deliver a copy of the manifest to U.S. Customs when importing or exporting the waste across U.S. borders. Record the foreign waste manifest document number in Item J.

MANIFEST DISTRIBUTION

GENERATOR: Upon placing the waste into transportation (first transporter signs and dates manifest) remove the white and gold banded copies and give the remainder of the manifest copies to the transporter. Sent the white copy to MDEQ no later than the tenth day of the month following the shipment. For shipments of wastes being transported to a designated facility outside of Michigan when an out-of-state manifest is used, mail to the MDEQ a photocopy of the manifest when the shipment is placed into transportation and mail a photocopy of the second generator manifest copy, when received.

TRANSPORTER: Upon delivery to the designated (or alternate) facility, and that facility signs and dates the manifest, the canary banded copy will be returned to you. If more than one transporter is used, the manifest is to be copied and supplied to the previous transporter acknowledging the receipt of the shipment by the next transporter. The canary banded copy stays with the manifest until the shipment reaches the designated facility.

DESIGNATED FACILITY: Upon signing and dating the manifest as received, give the canary banded

ADDRESS ALL MDEQ MANIFEST COPIES TO:
WASTE MANAGEMENT DIVISION
MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
PO BOX 30038
LANSING MI 48909-7538

The public reporting burden for this collection of information is estimated to average 31 minutes for generators, 16 minutes for transporters, and 18 minutes for treatment, storage and disposal facilities. The record-keeping burden per response for this collection of information is estimated to average 5 minutes for generators, 5 minutes for transporters, and 6 minutes for treatment, storage and disposal facilities. The burden associated with reading the regulations is estimated at 1 hour and 15 minutes annually. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency.

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB numbers for EPA's regulations are listed in 40 CFR Part 9 and 48 CFR Chapter 15. Send comments regarding these burden statements or any other aspect of this collection, including suggestions for reducing the burden, including through use of automated collection techniques to the Director, OPPE Regulatory Information Division, U.S. Environmental Protection Agency (2 37), 401 M St., S.W., Washington, D.C., 20460 and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Attention: Desk Officer for EPA, 725 17th Street, N.W., Washington, D.C. 20503. Include the OMB control number in any correspondence.

WASTE MANAGEMENT DIVISION
MICHIGAN DEPARTMENT OF
ENVIRONMENTAL QUALITY

DO NOT WRITE IN THIS SPACE
ATT. ☐ DIS. ☐ REJ. ☐ PR. ☐

Required under authority of Part 111 and Part 121 of Act 451, 1994, as amended.
Failure to file may subject you to criminal and/or civil penalties under Sections 324.11151 or 324.12116 MCL.

Please print or type.

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. MID005354386
Manifest Document No.
2. Page 1 of 1
Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
WOLVERINE GASKET & MFG.
2638 PRINCESS
INKSTER, MI 48141

4. Generator's Phone ( ) 517 810-1135 DOUG ROMMECK

A. State Manifest Document Number MI 9757373
B. State Generator's ID

5. Transporter 1 Company Name S&C
6. US EPA ID Number MIR000039701
C. State Transporter's ID
D. Transporter's Phone 734 [illegible]

7. Transporter 2 Company Name
8. US EPA ID Number
E. State Transporter's ID
F. Transporter's Phone

9. Designated Facility Name and Site Address
MICHIGAN DISPOSAL WASTE TREATMENT PLANT
49350 NORTH I94 SERVICE DRIVE
BELLEVILLE, MICHIGAN 48111
10. US EPA ID Number MID000724831
G. State Facility's ID
H. Facility's Phone 800-592-5489

	HM	11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID NUMBER).	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	☐	NON RCRA/NON DOT REGULATED SOLIDS	001	DT		P	SLUD
b.	☐						
c.	☐						
d.	☐						

MI 9757373

J. Additional Descriptions for Materials Listed Above
APPROVAL# 11A 161904TBR (CONTAMINATED SOIL)

K. Handling Codes
a
b
c
d

15. Special Handling Instructions and Additional Information

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR; if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: Douglas Rommeck
Signature:
Date: Month Day Year: 10 [illegible] 01

17. Transporter 1 Acknowledgment of Receipt of Materials
Printed/Typed Name: [illegible]
Signature:
Date: Month Day Year: [illegible]

18 Transporter 2 Acknowledgment of Receipt of Materials
Printed/Typed Name
Signature
Date: Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name
Signature
Date: Month Day Year

GENERATOR
TRANSPORTER
FACILITY

ALL SPILLS MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHIGAN AT 1-800-292-4706 OR OUT OF STATE AT 517-373-7660 AND THE NATIONAL RESPONSE CENTER AT 1-800-424-8802 24 HOUR PER DAY.

EPA Form 8700-22 (Rev. 9/88)

GENERATOR 1st COPY

EQP 5110
Rev. 7/03

MI0012805

GENERAL INSTRUCTIONS

Read all instructions before completing this form. This form has been designed for use on a 12-pitch (elite) typewriter/computer printer: a firm point pen may also be used - press down hard. Ensure all copies are legible.

Federal and state regulations require generators and transporters of hazardous waste and owners or operators of hazardous waste treatment, storage, and disposal facilities to use this form (8700-22) and, if necessary, the continuation sheet (Form 8700-22A) for both inter- and intrastate transportation of hazardous waste as defined in 40 CFR and Part 111 of Act 451 of 1994, as amended (Part 111). State regulations also require the use of this manifest for all regulated shipments of liquid industrial waste as required in Part 121 of Act 451 of 1994, as amended (Part 121).

Federal and State regulations provide for additional requirements, not included in these instructions, regarding the use and management of this form (40 CFR, 49 CFR, Part 111, Part 121).

Additional information such as "Rejected Load Procedures", state assigned identification numbers, manifest forms, etc., can be obtained by contacting the Michigan Department of Environmental Quality (MDEQ), Waste Management Divisions (WMD) Internet Home Page at http://www.deq.state.mi.us/wmd or you may contact the Manifest Unit directly at (517) 373-1217. Continuation sheets are not supplied by MDEQ.

Complete all items on the manifest. Enter "N/A" if any item does not apply. Leave items that may be needed later blank, such as a second transporter.

Item 1. Enter the generator's U.S. EPA twelve digit identification number. For Part 121 manifested shipments where a generator does not have a U.S. EPA assigned number, a state assigned number must be obtained and used. The generator of the waste must enter a unique five digit manifest document number (e.g. 00001).

Item 2. Page number 1 of 1 should be recorded unless a continuation sheet is used, in which case the total number of pages, counting the initial manifest page, should be shown.

Item 3. Enter the name of the generator and the mailing address to which the manifest should be mailed. If the address of the site at which the waste was placed into transportation is different from the mailing address record the site address in item J.

Item 4. Enter a telephone number (including area code) where an authorized agent of the generator can be reached in the event of an emergency and/or a partial or total rejected load.

NOTE: The 24 hour emergency phone number required for a hazardous materials shipping paper may be different from the generator's phone number.

Item 5. Enter the company name of the first transporter who will transport the waste.

Item 6. Enter the transporter's U.S. EPA twelve digit identification number. For Part 121 manifested shipments where a transporter does not have a U.S. EPA assigned number, a state assigned number is to be used.

Item 7. If using a second transporter, enter the company name.

Item 8. Enter the second transporter's U.S. EPA twelve digit identification number. For Part 121 manifested shipments where a transporter does not have a U.S. EPA assigned number, a state number is to be used.

NOTE: If more than two transporters are used, the generator or third transporter shall initiate a continuation sheet. In Item L of the continuation sheet, the generator/transporter must copy the State manifest document number listed in Item A. Every transport company used between the generator and the designated facility (except for intermediate rail or barge transporters used between the initial rail or barge carriers and the designated facility) must be listed. This is not intended to require multiple signatures for individual drivers working for one transporter. Item 2 is to be changed to reflect the added page(s). Continuation sheets must be appropriately completed in their entirety and properly distributed. Continuation sheets may not be used to list additional waste streams.

Item 9. Enter the company name and site address of the facility designated to receive the waste listed on this manifest.

Item 10. Enter the U.S. EPA twelve digit identification number for the designated facility described in Item 9. For Part 121 manifested shipments where a designated facility does not have a U.S. EPA assigned number, a state assigned number is to be used.

Item 11. Enter an X in the HM box if the waste is a hazardous material regulate by U.S. DOT (See 49 CFR 172). Enter the required U.S. DOT shipping description, including Proper Shipping Name, Hazard Class or Division, ID Number (UN/NA), and packing group for each waste as identified in 49 CFR 172. Additional information may also be required in this space, including technical name and reportable quantity references. For only Part 121 regulated wastes include an appropriate shipping description for the waste stream.

Item 12. Enter the number of containers for each waste and the appropriate abbreviations listed below for the type of container. Each container type requires separate entry.

DM = Metal drums, barrels, kegs	CY = Cylinders
DW = Wooden drums, barrels, kegs	CM = Metal boxes, cartons, cases (including roll-offs)
DF = Fiberboard or plastic drums, barrels, kegs	CW = Wooden boxes, cartons, cases
DT = Dump truck	CF = Fiber or plastic boxes, cartons, cases
TP = Tanks, portable	BA = Burlap, cloth, paper / plastic bags
TT = Cargo tanks (tank trucks)	
TC = Tank cars	

Item 13. Enter the total quantity of waste described on each line. Do not use decimals or fractions.

Item 14. Enter the appropriate abbreviation for the unit of measure listed below.

G = Gallons (liquids only)	L = Liters (liquids only)
P = Pounds	K = Kilograms
T = Tons (2000 lbs.)	M = Metric tons (1000 kg)
Y = Cubic yards	N = Cubic meters

Item 15. The generator may use this space to indicate special transportation, treatment, storage or disposal information. Import/Export information as noted in the "International Shipment" instructions section is to be recorded here.

Item 16. The generator must read, print his/her name, sign and date the certification statement.

Item 17. Print the name of the person accepting the waste on behalf of the first transporter. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

Item 18. If applicable, print the name of the person accepting the waste on behalf of the second transporter. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

Item 19. An authorized representative of the designated (or alternate) facility must note in this space any discrepancy in the waste shipment.

Item 20. Print the name of the person accepting the waste on behalf of the designated facility. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

NOTE: MDEQ "Rejected Load Procedures" provides guidance for partial or total load rejections.

Only the following information in the shaded area is a State of Michigan requirement:

Item A. A preprinted State manifest document number.

Item B - H. May be required by other states.

Item I. For hazardous wastes, enter the appropriate waste numbers found in R299.9212 through R299.9214 of Part 111 and 40 CFR 261 Subparts C and D. If more than one waste number is required to appropriately identify the waste, enter the additional numbers in item J. In selecting the most appropriate waste number the following hierarchy must be used: acute waste (including P and acute F), U (toxic), K (specific sources), non-acute F (non-specific sources) and D (characteristic). State regulated wastes follow the same hierarchy as federally regulated wastes. For Part 121 wastes which are not hazardous wastes enter the appropriate code listed below.

Mixed Solvents	007L	Storm Sewer Cleanouts	031L
Pharmaceutical	014L	Sanitary Sewer Cleanouts	032L
Crankcase Oil	017L	X-Ray/Photo Solutions	033L
Coolants and Water Soluble Oils	019L	Water Based Cleaning Solutions	034L
Other Oil (Describe in Item 11 or Item J)	021L	Car Wash Sludges	035L
Brine	022L	Grease Trap Wastes	036L
PCB	026L		
Other Wastes (Describe in Item 11 or Item J)	029L		
Antifreeze	030L		

Item J. Generators are to use this space for the site address if different from the mailing address noted in Item 3, additional waste codes, additional description for a Part 121 waste as noted in Item I of these instructions, approval of commingling authority as required in R299.9304(6).

Item K. List any specific codes which apply.

Burned for Energy Recovery	B
Conditionally Exempt Small Quantity Generator	C
Emergency Response Cleanup	E
Household Generated	H
Recycled Precious Metals	P
Recycled, Reclaimed, Used or Reused	R
Universal Waste	U

INTERNATIONAL SHIPMENTS

Exports- Transporters must sign and enter the date the waste leaves the United States in Item 15. The primary exporter must identify the point of departure from the United States.*

Imports- Shipments of hazardous and Part 121 regulated wastes must be accompanied by a U.S. EPA Uniform Hazardous Waste Manifest. Any person functioning as the U.S. importer, as defined in Part 111, must complete the manifest as required in R299.9310*.

*Transporters of hazardous waste shipments must deliver a copy of the manifest to U.S. Customs when importing or exporting the waste across U.S. borders. Record the foreign waste manifest document number in Item J.

MANIFEST DISTRIBUTION

GENERATOR: Upon placing the waste into transportation (first transporter signs and dates manifest) remove the white and gold banded copies and give the remainder of the manifest copies to the transporter. Sent the white copy to MDEQ no later than the tenth day of the month following the shipment. For shipments of wastes being transported to a designated facility outside of Michigan when an out-of-state manifest is used, mail to the MDEQ a photocopy of the manifest when the shipment is placed into transportation and mail a photocopy of the second generator manifest copy, when received.

TRANSPORTER: Upon delivery to the designated (or alternate) facility, and that facility signs and dates the manifest, the canary banded copy will be returned to you. If more than one transporter is used, the manifest is to be copied and supplied to the previous transporter acknowledging the receipt of the shipment by the next transporter. the canary banded copy stays with the manifest until the shipment reaches the designated facility.

DESIGNATED FACILITY: Upon signing and dating the manifest as received, give the canary banded

ADDRESS ALL MDEQ MANIFEST COPIES TO:
WASTE MANAGEMENT DIVISION
MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
PO BOX 30038
LANSING MI 48909-7538

The public reporting burden for this collection of information is estimated to average 31 minutes for generators, 18 minutes for transporters, and 18 minutes for treatments, storage and disposal facilities. The record-keeping burden per response for this collection of information is estimated to average 6 minutes for generators, 6 minutes for transporters, and 6 minutes for treatment, storage and disposal facilities. The burden associated with reading the regulations is estimated at 1 hour and 15 minutes annually. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency.

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB numbers for EPA's regulations are listed in 40 CFR Part 9 and 48 CFR Chapter 15. Send comments regarding these burden statements or any other aspect of this collection, including suggestions for reducing the burden, including through use of automated collection techniques to the Director, OPPE Regulatory Information Division, U.S. Environmental Protection Agency (2 37), 401 M St., S.W., Washington, D.C., 20460 and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Attention: Desk Officer for EPA, 725 17th Street, N.W., Washington, D.C. 20503. Include the OMB control number in any correspondence.

MI0012807

CERTIFICATE OF DISPOSAL

This certificate is to verify the wastes specified on Manifest # M9757373

have been properly disposed of in accordance with all local, state and federal regulations.

"Disposed of" means either: 1) Burial or 2) Processed as specified in 40 CFR et seq.

FACILITY NAME: *(Please check one)*	☑ Michigan Disposal Waste Treatment Plant (EPA I.D. # MID000724831)	☐ Wayne Disposal, Inc. (EPA I.D. # MID048090633)
ADDRESS:	49350 N. I-94 Service Drive Belleville, Michigan 48111	
PHONE NUMBER:	1-800-592-5489	
FAX NUMBER:	1-800-592-5329	

Authorized Signature: _____

THE ENVIRONMENTAL QUALITY COMPANY 49350 N. I-94 SERVICE DRIVE BELLEVILLE MICHIGAN 48111

FORM1020 (3/96)

WASTE MANAGEMENT DIVISION
MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY

DO NOT WRITE IN THIS SPACE
ATT. ☐ DIS. ☐ REJ. ☐ PR. ☐

Required under authority of Part 111 and Part 121 of Act 451, 1994, as amended.

Failure to file may subject you to criminal and/or civil penalties under Sections 324.11151 or 324.12116 MCL.

Please print or type.

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. MID005354389
Manifest Document No.
2. Page 1 of 1
Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address: WOLVERINE GASKET & MFG, 2838 PRINCESS, INKSTER, MI 48141
4. Generator's Phone (517) 610-1136 DOUG ROMMECK

A. State Manifest Document Number: MI 9757372
B. State Generator's ID

5. Transporter 1 Company Name: G&C
6. US EPA ID Number: MIR000039701
C. State Transporter's ID: 734-256-6509
D. Transporter's Phone

7. Transporter 2 Company Name
8. US EPA ID Number
E. State Transporter's ID
F. Transporter's Phone

9. Designated Facility Name and Site Address: MICHIGAN DISPOSAL WASTE TREATMENT PLANT, 49350 NORTH I94 SERVICE DRIVE, BELLEVILLE, MICHIGAN 48111
10. US EPA ID Number: MID000724831
G. State Facility's ID
H. Facility's Phone: 800-592-5489

	HM	11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID NUMBER).	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	☐	NON RCRA/NON DOT REGULATED SOLIDS	001	DT	80,000	P	SLUD
b.	☐						
c.	☐						
d.	☐						

J. Additional Descriptions for Materials Listed Above
APPROVAL# 11A: 101904TBB (CONTAMINATED SOIL)

K. Handling Codes
a
b
c
d

15. Special Handling Instructions and Additional Information

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR; if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: Douglas Rommeck
Signature: [signature]
Date: Month 10 Day 26 Year 04

17. Transporter 1 Acknowledgment of Receipt of Materials
Printed/Typed Name: Andrew Feeman
Signature: Andrew Feeman
Date: Month 10 Day 26 Year 04

18 Transporter 2 Acknowledgment of Receipt of Materials
Printed/Typed Name
Signature
Date: Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: [illegible]
Signature: [illegible]
Date: Month Day Year

GENERATOR

TRANSPORTER

FACILITY

ALL SPILLS MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHIGAN AT 1-800-292-4706 OR OUT OF STATE AT 517-373-7660 AND THE NATIONAL RESPONSE CENTER AT 1-800-424-8802 24 HOUR PER DAY.

EPA Form 8700-22 (Rev. 9/88) GENERATOR 2nd COPY EQP 5110 Rev. 7/03

MI0012808

GENERAL INSTRUCTIONS

Read all instructions before completing this form. This form has been designed for use on a 12-pitch (elite) typewriter/computer printer; a firm point pen may also be used - press down hard. Ensure all copies are legible.

Federal and state regulations require generators and transporters of hazardous waste and owners or operators of hazardous waste treatment, storage, and disposal facilities to use this form (8700-22) and, if necessary, the continuation sheet (Form 8700-22A) for both inter- and intrastate transportation of hazardous waste as defined in 40 CFR and Part 111 of Act 451 of 1994, as amended (Part 111). State regulations also require the use of this manifest for all regulated shipments of liquid industrial waste as required in Part 121 of Act 451 of 1994, as amended (Part 121).

Federal and State regulations provide for additional requirements, not included in these instructions, regarding the use and management of this form (40 CFR, 49 CFR, Part 111, Part 121).

Additional information such as "Rejected Load Procedures", state assigned identification numbers, manifest forms, etc., can be obtained by contacting the Michigan Department of Environmental Quality (MDEQ), Waste Management Divisions (WMD) Internet Home Page at http://www.deq.state.mi.us/wmd or you may contact the Manifest Unit directly at (517) 373-1217. Continuation sheets are not supplied by MDEQ.

Complete all items on the manifest. Enter "N/A" if any item does not apply. Leave items that may be needed later blank, such as a second transporter.

Item 1. Enter the generator's U.S. EPA twelve digit identification number. For Part 121 manifested shipments where a generator does not have a U.S. EPA assigned number, a state assigned number must be obtained and used. The generator of the waste must enter a unique five digit manifest document number (e.g 00001).

Item 2. Page number 1 of 1 should be recorded unless a continuation sheet is used, in which case the total number of pages, counting the initial manifest page, should be shown.

Item 3. Enter the name of the generator and the mailing address to which the manifest should be mailed. If the address of the site at which the waste was placed into transportation is different from the mailing address record the site address in item J.

Item 4. Enter a telephone number (including area code) where an authorized agent of the generator can be reached in the event of an emergency and/or a partial or total rejected load.

NOTE: The 24 hour emergency phone number required for a hazardous materials shipping paper may be different from the generator's phone number.

Item 5. Enter the company name of the first transporter who will transport the waste.

Item 6. Enter the transporter's U.S. EPA twelve digit identification number. For Part 121 manifested shipments where a transporter does not have a U.S. EPA assigned number, a state assigned number is to be used.

Item 7. If using a second transporter, enter the company name.

Item 8. Enter the second transporter's U.S. EPA twelve digit identification number. For Part 121 manifested shipments where a transporter does not have a U.S. EPA assigned number, a state number is to be used.

NOTE: If more than two transporters are used, the generator or third transporter shall initiate a continuation sheet. In Item L of the continuation sheet, the generator/transporter must copy the State manifest document number listed in item A. Every transport company used between the generator and the designated facility (except for intermediate rail or barge transporters used between the initial rail or barge carriers and the designated facility) must be listed. This is not intended to require multiple signatures for individual drivers working for one transporter. Item 2 is to be changed to reflect the added page(s). Continuation sheets must be appropriately completed in their entirety and properly distributed. Continuation sheets may not be used to list additional waste streams.

Item 9. Enter the company name and site address of the facility designated to receive the waste listed on this manifest.

Item 10. Enter the U.S. EPA twelve digit identification number for the designated facility described in Item 9. For Part 121 manifested shipments where a designated facility does not have a U.S. EPA assigned number, a state assigned number is to be used.

Item 11. Enter an X in the HM box if the waste is a hazardous material regulate by U.S. DOT (See 49 CFR 172). Enter the required U.S. DOT shipping description, including Proper Shipping Name, Hazard Class or Division, ID Number (UN/NA), and packing group for each waste as identified in 49 CFR 172. Additional information may also be required in this space, including technical name and reportable quantity references. For only Part 121 regulated wastes include an appropriate shipping description for the waste stream.

Item 12. Enter the number of containers for each waste and the appropriate abbreviations listed below for the type of container. Each container type requires separate entry.

DM = Metal drums, barrels, kegs	CY = Cylinders
DW = Wooden drums, barrels, kegs	CM = Metal boxes, cartons, cases (including roll-offs)
DF = Fiberboard or plastic drums, barrels, kegs	CW = Wooden boxes, cartons, cases
DT = Dump truck	CF = Fiber or plastic boxes, cartons, cases
TP = Tanks, portable	BA = Burlap, cloth, paper / plastic bags
TT = Cargo tanks (tank trucks)	
TC = Tank cars	

Item 13. Enter the total quantity of waste described on each line. Do not use decimals or fractions.

Item 14. Enter the appropriate abbreviation for the unit of measure listed below.

G = Gallons (liquids only)	L = Liters (liquids only)
P = Pounds	K = Kilograms
T = Tons (2000 lbs.)	M = Metric tons (1000 kg)
Y = Cubic yards	N = Cubic meters

Item 15. The generator may use this space to indicate special transportation, treatment, storage or disposal information. Import/Export information as noted in the "International Shipment" instructions section is to be recorded here.

Item 16. The generator must read, print his/her name, sign and date the certification statement.

Item 17. Print the name of the person accepting the waste on behalf of the first transporter. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

Item 18. If applicable, print the name of the person accepting the waste on behalf of the second transporter. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

Item 19. An authorized representative of the designated (or alternate) facility must note in this space any discrepancy in the waste shipment.

Item 20. Print the name of the person accepting the waste on behalf of the designated facility. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

NOTE: MDEQ "Rejected Load Procedures" provides guidance for partial or total load rejections.

Only the following information in the shaded area is a State of Michigan requirement:

Item A. A preprinted State manifest document number.

Item B - H. May be required by other states.

Item I. For hazardous wastes, enter the appropriate waste numbers found in R299.9212 through R299.9214 of Part 111 and 40 CFR 261 Subparts C and D. If more than one waste number is required to appropriately identify the waste, enter the additional numbers in item J. In selecting the most appropriate waste number the following hierarchy must be used: acute waste (including P and acute F), U (toxic), K (specific sources), non-acute F (non-specific sources) and D (characteristic). State regulated wastes follow the same hierarchy as federally regulated wastes. For Part 121 wastes which are not hazardous wastes enter the appropriate code listed below.

Mixed Solvents	007L	Storm Sewer Cleanouts	031L
Pharmaceutical	014L	Sanitary Sewer Cleanouts	032L
Crankcase Oil	017L	X-Ray/Photo Solutions	033L
Coolants and Water Soluble Oils	019L	Water Based Cleaning Solutions	034L
Other Oil (Describe in Item 11 or Item J)	021L	Car Wash Sludges	035L
Brine	022L	Grease Trap Wastes	036L
PCB	026L		
Other Wastes (Describe in Item 11 or Item J)	029L		
Antifreeze	030L		

Item J. Generators are to use this space for the site address if different from the mailing address noted in item 3, additional waste codes, additional description for a Part 121 waste as noted in Item I of these instructions, approval of commingling authority as required in R299.9304(6).

Item K. List any specific codes which apply.

Burned for Energy Recovery	B
Conditionally Exempt Small Quantity Generator	C
Emergency Response Cleanup	E
Household Generated	H
Recycled Precious Metals	P
Recycled, Reclaimed, Used or Reused	R
Universal Waste	U

INTERNATIONAL SHIPMENTS

Exports- Transporters must sign and enter the date the waste leaves the United States in Item 15. The primary exporter must identify the point of departure from the United States.*

Imports- Shipments of hazardous and Part 121 regulated wastes must be accompanied by a U.S. EPA Uniform Hazardous Waste Manifest. Any person functioning as the U.S. Importer, as defined in Part 111, must complete the manifest as required in R299.9310*

*Transporters of hazardous waste shipments must deliver a copy of the manifest to U.S. Customs when importing or exporting the waste across U.S. borders. Record the foreign waste manifest document number in Item J.

MANIFEST DISTRIBUTION

GENERATOR: Upon placing the waste into transportation (first transporter signs and dates manifest) remove the white and gold banded copies and give the remainder of the manifest copies to the transporter. Sent the white copy to MDEQ no later than the tenth day of the month following the shipment. For shipments of wastes being transported to a designated facility outside of Michigan when an out-of-state manifest is used, mail to the MDEQ a photocopy of the manifest when the shipment is placed into transportation and mail a photocopy of the second generator manifest copy, when received.

TRANSPORTER: Upon delivery to the designated (or alternate) facility, and that facility signs and dates the manifest, the canary banded copy will be returned to you. If more than one transporter is used, the manifest is to be copied and supplied to the previous transporter acknowledging the receipt of the shipment by the next transporter. The canary banded copy stays with the manifest until the shipment reaches the designated facility.

DESIGNATED FACILITY: Upon signing and dating the manifest as received, give the canary banded

ADDRESS ALL MDEQ MANIFEST COPIES TO:
WASTE MANAGEMENT DIVISION
MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
PO BOX 30038
LANSING MI 48909-7538

The public reporting burden for this collection of information is estimated to average 31 minutes for generators, 16 minutes for transporters, and 18 minutes for treatment, storage and disposal facilities. The record-keeping burden per response for this collection of information is estimated to average 6 minutes for generators, 6 minutes for transporters, and 6 minutes for treatment, storage and disposal facilities. The burden associated with reading the regulations is estimated at 1 hour and 15 minutes annually. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency.

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB numbers for EPA's regulations are listed in 40 CFR Part 9 and 48 CFR Chapter 15. Send comments regarding these burden estimates or any other aspect of this collection, including suggestions for reducing the burden, including through use of automated collection techniques to the Director, OPPE Regulatory Information Division, U.S. Environmental Protection Agency (2.37), 401 M St., S.W., Washington, D.C., 20460 and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Attention: Desk Officer for EPA, 725 17th Street, N.W., Washington, D.C. 20503. Include the OMB control number in any correspondence.

WASTE MANAGEMENT DIVISION
MICHIGAN DEPARTMENT OF
ENVIRONMENTAL QUALITY

DO NOT WRITE IN THIS SPACE
ATT. ☐ DIS. ☐ REJ. ☐ PR. ☐

Required under authority of Part 111 and Part 121 of Act 451, 1994, as amended.

Failure to file may subject you to criminal and/or civil penalties under Sections 324.11151 or 324.12116 MCL.

Please print or type.

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. MID005354386
Manifest Document No.
2. Page 1 of 1
Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address: WOLVERINE GASKET & MFG. 2039 PRINCESS INKSTER, MI 48141
4. Generator's Phone (517) 610-1136 DOUG ROMMECK

A. State Manifest Document Number: MI 9757372
B. State Generator's ID:

5. Transporter 1 Company Name: G&C
6. US EPA ID Number: MIR000039701
C. State Transporter's ID:
D. Transporter's Phone:

7. Transporter 2 Company Name:
8. US EPA ID Number:
E. State Transporter's ID:
F. Transporter's Phone:

9. Designated Facility Name and Site Address: MICHIGAN DISPOSAL WASTE TREATMENT PLANT 49350 NORTH 194 SERVICE DRIVE BELLEVILLE, MICHIGAN 48111
10. US EPA ID Number: MID000724831
G. State Facility's ID:
H. Facility's Phone: 800-592-5489

	HM	11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID NUMBER).	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	☐	NON RCRA/NON DOT REGULATED SOLIDS	001	DT	20,000	P	SLUD
b.	☐						
c.	☐						
d.	☐						

J. Additional Descriptions for Materials Listed Above
APPROVAL# 11A 101904TDB (CONTAMINATED SOIL)

K. Handling Codes
a
b
c
d

15. Special Handling Instructions and Additional Information

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR; if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: Douglas Rommeck
Signature: [signature]
Date: Month 10 Day 26 Year 04

17. Transporter 1 Acknowledgment of Receipt of Materials
Printed/Typed Name: Andrew Feeman
Signature: Andrew Feeman
Date: Month 10 Day 26 Year 04

18 Transporter 2 Acknowledgment of Receipt of Materials
Printed/Typed Name:
Signature:
Date: Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: [illegible]
Signature: [illegible]
Date: Month Day Year

GENERATOR

TRANSPORTER

FACILITY

ALL SPILLS MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHIGAN AT 1-800-292-4706 OR OUT OF STATE AT 517-373-7660 AND THE NATIONAL RESPONSE CENTER AT 1-800-424-8802 24 HOUR PER DAY.

EPA Form 8700-22 (Rev. 9/88)

GENERATOR 1st COPY

EQP 5110 Rev. 7/03

MI0012810

GENERAL INSTRUCTIONS

Read all instructions before completing this form. This form has been designed for use on a 12-pitch (elite) typewriter/computer printer: a firm point pen may also be used - press down hard. Ensure all copies are legible.

Federal and state regulations require generators and transporters of hazardous waste and owners or operators of hazardous waste treatment, storage, and disposal facilities to use this form (8700-22) and, if necessary, the continuation sheet (Form 8700-22A) for both inter- and intrastate transportation of hazardous waste as defined in 40 CFR and Part 111 of Act 451 of 1994, as amended (Part 111). State regulations also require the use of this manifest for all regulated shipments of liquid industrial waste as required in Part 121 of Act 451 of 1994, as amended (Part 121).

Federal and State regulations provide for additional requirements, not included in these instructions, regarding the use and management of this form (40 CFR, 49 CFR, Part 111, Part 121).

Additional information such as "Rejected Load Procedures", state assigned identification numbers, manifest forms, etc., can be obtained by contacting the Michigan Department of Environmental Quality (MDEQ), Waste Management Divisions (WMD) Internet Home Page at http://www.deq.state.mi.us/wmd or you may contact the Manifest Unit directly at (517) 373-1217. Continuation sheets are not supplied by MDEQ.

Complete all items on the manifest. Enter "N/A" if any item does not apply. Leave items that may be needed later blank, such as a second transporter.

Item 1. Enter the generator's U.S. EPA twelve digit identification number. For Part 121 manifested shipments where a generator does not have a U.S. EPA assigned number, a state assigned number must be obtained and used. The generator of the waste must enter a unique five digit manifest document number (e.g. 00001).

Item 2. Page number 1 of 1 should be recorded unless a continuation sheet is used, in which case the total number of pages, counting the initial manifest page, should be shown.

Item 3. Enter the name of the generator and the mailing address to which the manifest should be mailed. If the address of the site at which the waste was placed into transportation is different from the mailing address record the site address in Item J.

Item 4. Enter a telephone number (including area code) where an authorized agent of the generator can be reached in the event of an emergency and/or a partial or total rejected load.

NOTE: The 24 hour emergency phone number required for a hazardous materials shipping paper may be different from the generator's phone number.

Item 5. Enter the company name of the first transporter who will transport the waste.

Item 6. Enter the transporter's U.S. EPA twelve digit identification number. For Part 121 manifested shipments where a transporter does not have a U.S. EPA assigned number, a state assigned number is to be used.

Item 7. If using a second transporter, enter the company name.

Item 8. Enter the second transporter's U.S. EPA twelve digit identification number. For Part 121 manifested shipments where a transporter does not have a U.S. EPA assigned number, a state number is to be used.

NOTE: If more than two transporters are used, the generator or third transporter shall initiate a continuation sheet. In Item L of the continuation sheet, the generator/transporter must copy the State manifest document number listed in Item A. Every transport company used between the generator and the designated facility (except for intermediate rail or barge transporters used between the initial rail or barge carriers and the designated facility) must be listed. This is not intended to require multiple signatures for individual drivers working for one transporter. Item 2 is to be changed to reflect the added page(s). Continuation sheets must be appropriately completed in their entirety and properly distributed. Continuation sheets may not be used to list additional waste streams.

Item 9. Enter the company name and site address of the facility designated to receive the waste listed on this manifest.

Item 10. Enter the U.S. EPA twelve digit identification number for the designated facility described in Item 9. For Part 121 manifested shipments where a designated facility does not have a U.S. EPA assigned number, a state assigned number is to be used.

Item 11. Enter an X in the HM box if the waste is a hazardous material regulate by U.S. DOT (See 49 CFR 172). Enter the required U.S. DOT shipping description, including Proper Shipping Name, Hazard Class or Division, ID Number (UN/NA), and packing group for each waste as identified in 49 CFR 172. Additional information may also be required in this space, including technical name and reportable quantity references. For only Part 121 regulated wastes include an appropriate shipping description for the waste stream.

Item 12. Enter the number of containers for each waste and the appropriate abbreviations listed below for the type of container. Each container type requires separate entry.

DM = Metal drums, barrels, kegs	CY = Cylinders
DW = Wooden drums, barrels, kegs	CM = Metal boxes, cartons, cases (including roll-offs)
DF = Fiberboard or plastic drums, barrels, kegs	CW = Wooden boxes, cartons, cases
DT = Dump truck	CF = Fiber or plastic boxes, cartons, cases
TP = Tanks, portable	BA = Burlap, cloth, paper / plastic bags
TT = Cargo tanks (tank trucks)	
TC = Tank cars	

Item 13. Enter the total quantity of waste described on each line. Do not use decimals or fractions.

Item 14. Enter the appropriate abbreviation for the unit of measure listed below.

G = Gallons (liquids only)	L = Liters (liquids only)
P = Pounds	K = Kilograms
T = Tons (2000 lbs.)	M = Metric tons (1000 kg)
Y = Cubic yards	N = Cubic meters

Item 15. The generator may use this space to indicate special transportation, treatment, storage or disposal information. Import/Export information as noted in the "International Shipment" instructions section is to be recorded here.

Item 16. The generator must read, print his/her name, sign and date the certification statement.

Item 17. Print the name of the person accepting the waste on behalf of the first transporter. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

Item 18. If applicable, print the name of the person accepting the waste on behalf of the second transporter. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

Item 19. An authorized representative of the designated (or alternate) facility must note in this space any discrepancy in the waste shipment.

Item 20. Print the name of the person accepting the waste on behalf of the designated facility. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

NOTE: MDEQ "Rejected Load Procedures" provides guidance for partial or total load rejections.

Only the following information in the shaded area is a State of Michigan requirement:

Item A. A preprinted State manifest document number.

Item B - H. May be required by other states.

Item I. For hazardous wastes, enter the appropriate waste numbers found in R299.9212 through R299.9214 of Part 111 and 40 CFR 261 Subparts C and D. If more than one waste number is required to appropriately identify the waste, enter the additional numbers in item J. In selecting the most appropriate waste number the following hierarchy must be used: acute waste (including P and acute F), U (toxic), K (specific sources), non-acute F (non-specific sources) and D (characteristic). State regulated wastes follow the same hierarchy as federally regulated wastes. For Part 121 wastes which are not hazardous wastes enter the appropriate code listed below.

Mixed Solvents	007L	Storm Sewer Cleanouts	031L
Pharmaceutical	014L	Sanitary Sewer Cleanouts	032L
Crankcase Oil	017L	X-Ray/Photo Solutions	033L
Coolants and Water Soluble Oils	019L	Water Based Cleaning Solutions	034L
Other Oil (Describe in Item 11 or Item J)	021L	Car Wash Sludges	035L
Brine	022L	Grease Trap Wastes	036L
PCB	026L		
Other Wastes (Describe in Item 11 or Item J)	029L		
Antifreeze	030L		

Item J. Generators are to use this space for the site address if different from the mailing address noted in Item 3, additional waste codes, additional description for a Part 121 waste as noted in Item I of these instructions, approval of commingling authority as required in R299.9304(6).

Item K. List any specific codes which apply.

Burned for Energy Recovery	B
Conditionally Exempt Small Quantity Generator	C
Emergency Response Cleanup	E
Household Generated	H
Recycled Precious Metals	P
Recycled, Reclaimed, Used or Reused	R
Universal Waste	U

INTERNATIONAL SHIPMENTS

Exports- Transporters must sign and enter the date the waste leaves the United States in Item 15. The primary exporter must identify the point of departure from the United States.*

Imports- Shipments of hazardous and Part 121 regulated wastes must be accompanied by a U.S. EPA Uniform Hazardous Waste Manifest. Any person functioning as the U.S. Importer, as defined in Part 111, must complete the manifest as required in R299.9310*

*Transporters of hazardous waste shipments must deliver a copy of the manifest to U.S. Customs when importing or exporting the waste across U.S. borders. Record the foreign waste manifest document number in Item J.

MANIFEST DISTRIBUTION

GENERATOR: Upon placing the waste into transportation (first transporter signs and dates manifest) remove the white and gold banded copies and give the remainder of the manifest copies to the transporter. Sent the white copy to MDEQ no later than the tenth day of the month following the shipment. For shipments of wastes being transported to a designated facility outside of Michigan when an out-of-state manifest is used, mail to the MDEQ a photocopy of the manifest when the shipment is placed into transportation and mail a photocopy of the second generator manifest copy, when received.

TRANSPORTER: Upon delivery to the designated (or alternate) facility, and that facility signs and dates the manifest, the canary banded copy will be returned to you. If more than one transporter is used, the manifest is to be copied and supplied to the previous transporter acknowledging the receipt of the shipment by the next transporter. the canary banded copy stays with the manifest until the shipment reaches the designated facility.

DESIGNATED FACILITY: Upon signing and dating the manifest as received, give the canary banded

ADDRESS ALL MDEQ MANIFEST COPIES TO:
WASTE MANAGEMENT DIVISION
MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
PO BOX 30038
LANSING MI 48909-7538

The public reporting burden for this collection of information is estimated to average 31 minutes for generators, 16 minutes for transporters, and 16 minutes for treatment, storage and disposal facilities. The record-keeping burden per response for this collection of information is estimated to average 6 minutes for generators, 6 minutes for transporters, and 6 minutes for treatment, storage and disposal facilities. The burden associated with reading the regulations is estimated at 1 hour and 15 minutes annually. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency.

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB numbers for EPA's regulations are listed in 40 CFR Part 9 and 48 CFR Chapter 15. Send comments regarding these burden estimates, or any other aspect of this collection, including suggestions for reducing the burden, including through use of automated collection techniques to the Director, OPPE Regulatory Information Division, U.S. Environmental Protection Agency (2 137), 401 M St., S.W., Washington, D.C., 20460 and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Attention: Desk Officer for EPA, 725 17th Street, N.W., Washington, D.C. 20503. Include the OMB control number in any correspondence.

MI0012811

MI0012812

CERTIFICATE OF DISPOSAL

This certificate is to verify the wastes specified on Manifest # MI9757372

have been properly disposed of in accordance with all local, state and federal regulations.

"Disposed of" means either: 1) Burial or 2) Processed as specified in 40 CFR et seq.

FACILITY NAME: *(Please check one)*

☒ Michigan Disposal Waste Treatment Plant (EPA I.D. # MID000724831)

☐ Wayne Disposal, Inc. (EPA I.D. # MID048090633)

ADDRESS: 49350 N. I-94 Service Drive
Belleville, Michigan 48111

PHONE NUMBER: 1-800-592-5489

FAX NUMBER: 1-800-592-5329

Authorized Signature: _____

THE ENVIRONMENTAL QUALITY COMPANY 49350 N. I-94 SERVICE DRIVE BELLEVILLE MICHIGAN 48111

FORM1020 (3/96)

WASTE MANAGEMENT DIVISION
MICHIGAN DEPARTMENT OF
ENVIRONMENTAL QUALITY

DO NOT WRITE IN THIS SPACE
ATT. ☐ DIS. ☐ REJ. ☐ PR. ☐

Required under authority of Part 111 and Part 121 of Act 451, 1994, as amended.
Form 100
Failure to file may subject you to criminal and/or civil penalties under Sections 324.11151 or 324.12116 MCL.

Please print or type.

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. MID005354386
Manifest Document No.
2. Page 1 of 1
Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
WOLVERINE GASKET & MFG.
3838 PRINCESS
INKSTER, MI 48141
4. Generator's Phone (517) 610-1130 DOUG ROMMECK

A. State Manifest Document Number MI 9757371
B. State Generator's ID

5. Transporter 1 Company Name S&C
6. US EPA ID Number MIR000039701
C. State Transporter's ID
D. Transporter's Phone 734-200-6509

7. Transporter 2 Company Name
8. US EPA ID Number
E. State Transporter's ID
F. Transporter's Phone

9. Designated Facility Name and Site Address
MICHIGAN DISPOSAL WASTE TREATMENT PLANT
49350 NORTH I94 SERVICE DRIVE
BELLEVILLE, MICHIGAN 48111
10. US EPA ID Number MID000724831
G. State Facility's ID
H. Facility's Phone 800-592-5489

	11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID NUMBER).	HM	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	NON RCRA/NON DOT REGULATED SOLIDS	☐	001	DT		P	SLUD
b.		☐					
c.		☐					
d.		☐					

J. Additional Descriptions for Materials Listed Above
APPROVAL# 11A: 101904TB8 (CONTAMINATED SOIL)

K. Handling Codes
a
b
c
d

15. Special Handling Instructions and Additional Information

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR; if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: Douglas Commeck
Signature:
Date: Month 10 Day 26 Year 04

TRANSPORTER

17. Transporter 1 Acknowledgment of Receipt of Materials
Printed/Typed Name
Signature
Date: Month Day Year

18 Transporter 2 Acknowledgment of Receipt of Materials
Printed/Typed Name
Signature
Date: Month Day Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name
Signature
Date: Month Day Year

GENERATOR

ALL SPILLS MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHIGAN AT 1-800-292-4706 OR OUT OF STATE AT 517-373-7660 AND THE NATIONAL RESPONSE CENTER AT 1-800-424-8802 24 HOUR PER DAY.

EPA Form 8700-22 (Rev. 9/88) GENERATOR 2nd COPY EQP 5110 Rev. 7/03

MI0012813

GENERAL INSTRUCTIONS

Read all instructions before completing this form. This form has been designed for use on a 12-pitch (elite) typewriter/computer printer; a firm point pen may also be used - press down hard. Ensure all copies are legible.

Federal and state regulations require generators and transporters of hazardous waste and owners or operators of hazardous waste treatment, storage, and disposal facilities to use this form (8700-22) and, if necessary, the continuation sheet (Form 8700-22A) for both inter- and intrastate transportation of hazardous waste as defined in 40 CFR and Part 111 of Act 451 of 1994, as amended (Part 111). State regulations also require the use of this manifest for all regulated shipments of liquid industrial waste as required in Part 121 of Act 451 of 1994, as amended (Part 121).

Federal and State regulations provide for additional requirements, not included in these instructions, regarding the use and management of this form (40 CFR, 49 CFR, Part 111, Part 121).

Additional information such as "Rejected Load Procedures", state assigned identification numbers, manifest forms, etc., can be obtained by contacting the Michigan Department of Environmental Quality (MDEQ), Waste Management Divisions (WMD) Internet Home Page at http://www.deq.state.mi.us/wmd or you may contact the Manifest Unit directly at (517) 373-1217. Continuation sheets are not supplied by MDEQ.

Complete all items on the manifest. Enter "N/A" if any item does not apply. Leave items that may be needed later blank, such as a second transporter.

Item 1. Enter the generator's U.S. EPA twelve digit identification number. For Part 121 manifested shipments where a generator does not have a U.S. EPA assigned number, a state assigned number must be obtained and used. The generator of the waste must enter a unique five digit manifest document number (e.g. 00001).

Item 2. Page number 1 of 1 should be recorded unless a continuation sheet is used, in which case the total number of pages, counting the initial manifest page, should be shown.

Item 3. Enter the name of the generator and the mailing address to which the manifest should be mailed. If the address of the site at which the waste was placed into transportation is different from the mailing address record the site address in item J.

Item 4. Enter a telephone number (including area code) where an authorized agent of the generator can be reached in the event of an emergency and/or a partial or total rejected load.

NOTE: The 24 hour emergency phone number required for a hazardous materials shipping paper may be different from the generator's phone number.

Item 5. Enter the company name of the first transporter who will transport the waste.

Item 6. Enter the transporter's U.S. EPA twelve digit identification number. For Part 121 manifested shipments where a transporter does not have a U.S. EPA assigned number, a state assigned number is to be used.

Item 7. If using a second transporter, enter the company name.

Item 8. Enter the second transporter's U.S. EPA twelve digit identification number. For Part 121 manifested shipments where a transporter does not have a U.S. EPA assigned number, a state number is to be used.

NOTE: If more than two transporters are used, the generator or third transporter shall initiate a continuation sheet. In Item L of the continuation sheet, the generator/transporter must copy the State manifest document number listed in Item A. Every transport company used between the generator and the designated facility (except for intermediate rail or barge transporters used between the initial rail or barge carriers and the designated facility) must be listed. This is not intended to require multiple signatures for individual drivers working for one transporter. Item 2 is to be changed to reflect the added page(s). Continuation sheets must be appropriately completed in their entirety and properly distributed. Continuation sheets may not be used to list additional waste streams.

Item 9. Enter the company name and site address of the facility designated to receive the waste listed on this manifest.

Item 10. Enter the U.S. EPA twelve digit identification number for the designated facility described in Item 9. For Part 121 manifested shipments where a designated facility does not have a U.S. EPA assigned number, a state assigned number is to be used.

Item 11. Enter an X in the HM box if the waste is a hazardous material regulate by U.S. DOT (See 49 CFR 172). Enter the required U.S. DOT shipping description, including Proper Shipping Name, Hazard Class or Division, ID Number (UN/NA), and packing group for each waste as identified in 49 CFR 172. Additional information may also be required in this space, including technical name and reportable quantity references. For only Part 121 regulated wastes include an appropriate shipping description for the waste stream.

Item 12. Enter the number of containers for each waste and the appropriate abbreviations listed below for the type of container. Each container type requires separate entry.

DM	= Metal drums, barrels, kegs	CY	= Cylinders
DW	= Wooden drums, barrels, kegs	CM	= Metal boxes, cartons, cases (including roll-offs)
DF	= Fiberboard or plastic drums, barrels, kegs		
DT	= Dump truck	CW	= Wooden boxes, cartons, cases
TP	= Tanks, portable	CF	= Fiber or plastic boxes, cartons, cases
TT	= Cargo tanks (tank trucks)	BA	= Burlap, cloth, paper / plastic bags
TC	= Tank cars		

Item 13. Enter the total quantity of waste described on each line. Do not use decimals or fractions.

Item 14. Enter the appropriate abbreviation for the unit of measure listed below.

G	= Gallons (liquids only)	L	= Liters (liquids only)
P	= Pounds	K	= Kilograms
T	= Tons (2000 lbs.)	M	= Metric tons (1000 kg)
Y	= Cubic yards	N	= Cubic meters

Item 15. The generator may use this space to indicate special transportation, treatment, storage or disposal information. Import/Export information as noted in the "International Shipment" instructions section is to be recorded here.

Item 16. The generator must read, print his/her name, sign and date the certification statement.

Item 17. Print the name of the person accepting the waste on behalf of the first transporter. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

Item 18. If applicable, print the name of the person accepting the waste on behalf of the second transporter. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

Item 19. An authorized representative of the designated (or alternate) facility must note in this space any discrepancy in the waste shipment.

Item 20. Print the name of the person accepting the waste on behalf of the designated facility. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

NOTE: MDEQ "Rejected Load Procedures" provides guidance for partial or total load rejections.

Only the following information in the shaded area is a State of Michigan requirement:

Item A. A preprinted State manifest document number.

Item B - H. May be required by other states.

Item I. For hazardous wastes, enter the appropriate waste numbers found in R299.9212 through R299.9214 of Part 111 and 40 CFR 261 Subparts C and D. If more than one waste number is required to appropriately identify the waste, enter the additional numbers in item J. In selecting the most appropriate waste number the following hierarchy must be used: acute waste (including P and acute F), U (toxic), K (specific sources), non-acute F (non-specific sources) and D (characteristic). State regulated wastes follow the same hierarchy as federally regulated wastes. For Part 121 wastes which are not hazardous wastes enter the appropriate code listed below.

Mixed Solvents	007L	Storm Sewer Cleanouts	031L
Pharmaceutical	014L	Sanitary Sewer Cleanouts	032L
Crankcase Oil	017L	X-Ray/Photo Solutions	033L
Coolants and Water Soluble Oils	019L	Water Based Cleaning Solutions	034L
Other Oil (Describe in Item 11 or Item J)	021L	Car Wash Sludges	035L
Brine	022L	Grease Trap Wastes	036L
PCB	026L		
Other Wastes (Describe in Item 11 or Item J)	029L		
Antifreeze	030L		

Item J. Generators are to use this space for the site address if different from the mailing address noted in Item 3, additional waste codes, additional description for a Part 121 waste as noted in Item I of these instructions, approval of commingling authority as required in R299.9304(6).

Item K. List any specific codes which apply.

Burned for Energy Recovery	B
Conditionally Exempt Small Quantity Generator	C
Emergency Response Cleanup	E
Household Generated	H
Recycled Precious Metals	P
Recycled, Reclaimed, Used or Reused	R
Universal Waste	U

INTERNATIONAL SHIPMENTS

Exports- Transporters must sign and enter the date the waste leaves the United States in Item 15. The primary exporter must identify the point of departure from the United States.*

Imports- Shipments of hazardous and Part 121 regulated wastes must be accompanied by a U.S. EPA Uniform Hazardous Waste Manifest. Any person functioning as the U.S. importer, as defined in Part 111, must complete the manifest as required in R299.9310*.

*Transporters of hazardous waste shipments must deliver a copy of the manifest to U.S. Customs when importing or exporting the waste across U.S. borders. Record the foreign waste manifest document number in Item J.

MANIFEST DISTRIBUTION

GENERATOR: Upon placing the waste into transportation (first transporter signs and dates manifest), remove the white and gold banded copies and give the remainder of the manifest copies to the transporter. Sent the white copy to MDEQ no later than the tenth day of the month following the shipment. For shipments of wastes being transported to a designated facility outside of Michigan when an out-of-state manifest is used, mail to the MDEQ a photocopy of the manifest when the shipment is placed into transportation and mail a photocopy of the second generator manifest copy, when received.

TRANSPORTER: Upon delivery to the designated (or alternate) facility, and that facility signs and dates the manifest, the canary banded copy will be returned to you. If more than one transporter is used, the manifest is to be copied and supplied to the previous transporter acknowledging the receipt of the shipment by the next transporter. The canary banded copy stays with the manifest until the shipment reaches the designated facility.

DESIGNATED FACILITY: Upon signing and dating the manifest as received, give the canary banded

ADDRESS ALL MDEQ MANIFEST COPIES TO:
WASTE MANAGEMENT DIVISION
MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
PO BOX 30038
LANSING MI 48909-7538

The public reporting burden for this collection of information is estimated to average 31 minutes for generators, 16 minutes for transporters, and 18 minutes for treatments, storage and disposal facilities. The record-keeping burden per response for this collection of information is estimated to average 8 minutes for generators, 6 minutes for transporters, and 6 minutes for treatment, storage and disposal facilities. The burden associated with reading the regulations is estimated at 1 hour and 15 minutes annually. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency.

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB numbers for EPA's regulations are listed in 40 CFR Part 9 and 48 CFR Chapter 15. Send comments regarding these burden statements or any other aspect of this collection, including suggestions for reducing the burden, including through use of automated collection techniques to the Director, OPPE Regulatory Information Division, U.S. Environmental Protection Agency (2.37), 401 M St., S.W., Washington, D.C., 20460 and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Attention: Desk Officer for EPA, 725 17th Street, N.W., Washington, D.C. 20503. Include the OMB control number in any correspondence.

MI0012814

DEQ WASTE MANAGEMENT DIVISION
MICHIGAN DEPARTMENT OF
ENVIRONMENTAL QUALITY

DO NOT WRITE IN THIS SPACE
ATT. ☐ DIS. ☐ REJ. ☐ PR. ☐

Required under authority of Part 111 and Part 121 of Act 451, 1994, as amended.
Failure to file may subject you to criminal and/or civil penalties under Sections 324.11151 or 324.12116 MCL.

Please print or type.

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. MID005354309
Manifest Document No.
2. Page 1 of 1
Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
WOLVERINE GASKET & MFG.
2030 PRINCESS
INKSTER, MI 48141

4. Generator's Phone (517) 610-1138 DOUG ROMMECK

A. State Manifest Document Number MI 9757371
B. State Generator's ID

5. Transporter 1 Company Name S&C
6. US EPA ID Number MIR000039701
C. State Transporter's ID
D. Transporter's Phone

7. Transporter 2 Company Name
8. US EPA ID Number
E. State Transporter's ID
F. Transporter's Phone

9. Designated Facility Name and Site Address
MICHIGAN DISPOSAL WASTE TREATMENT PLANT
49350 NORTH I94 SERVICE DRIVE
BELLEVILLE, MICHIGAN 48111
10. US EPA ID Number MID000724831
G. State Facility's ID
H. Facility's Phone 800-592-5489

	HM	11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID NUMBER).	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	☐	NON RCRA/NON DOT REGULATED SOLIDS	001	DT		P	SLUD
b.	☐						
c.	☐						
d.	☐						

J. Additional Descriptions for Materials Listed Above
APPROVAL# 11A 101904TBB (CONTAMINATED SOIL)

K. Handling Codes
a
b
c
d

15. Special Handling Instructions and Additional Information

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR; if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name	Signature	Date Month Day Year
[illegible] Commerce	[signature]	10 26 04

17. Transporter 1 Acknowledgment of Receipt of Materials

Printed/Typed Name	Signature	Date Month Day Year

18 Transporter 2 Acknowledgment of Receipt of Materials

Printed/Typed Name	Signature	Date Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Date Month Day Year

GENERATOR

TRANSPORTER

FACILITY

ALL SPILLS MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHIGAN AT 1-800-292-4706 OR OUT OF STATE AT 517-373-7660 AND THE NATIONAL RESPONSE CENTER AT 1-800-424-8802 24 HOUR PER DAY.

EPA Form 8700-22 (Rev. 9/88)

GENERATOR 1st COPY

EQP 5110 Rev. 7/03

MI0012815

GENERAL INSTRUCTIONS

Read all instructions before completing this form. This form has been designed for use on a 12-pitch (elite) typewriter/computer printer; a firm point pen may also be used - press down hard. Ensure all copies are legible.

Federal and state regulations require generators and transporters of hazardous waste and owners or operators of hazardous waste treatment, storage, and disposal facilities to use this form (8700-22) and, if necessary, the continuation sheet (Form 8700-22A) for both inter- and intrastate transportation of hazardous waste as defined in 40 CFR and Part 111 of Act 451 of 1994, as amended (Part 111). State regulations also require the use of this manifest for all regulated shipments of liquid industrial waste as required in Part 121 of Act 451 of 1994, as amended (Part 121).

Federal and State regulations provide for additional requirements, not included in these instructions, regarding the use and management of this form (40 CFR, 49 CFR, Part 111, Part 121).

Additional information such as "Rejected Load Procedures", state assigned identification numbers, manifest forms, etc., can be obtained by contacting the Michigan Department of Environmental Quality (MDEQ), Waste Management Divisions (WMD) Internet Home Page at http://www.deq.state.mi.us/wmd or you may contact the Manifest Unit directly at (517) 373-1217. Continuation sheets are not supplied by MDEQ.

Complete all items on the manifest. Enter "N/A" if any item does not apply. Leave items that may be needed later blank, such as a second transporter.

Item 1. Enter the generator's U.S. EPA twelve digit identification number. For Part 121 manifested shipments where a generator does not have a U.S. EPA assigned number, a state assigned number must be obtained and used. The generator of the waste must enter a unique five digit manifest document number (e.g. 00001).

Item 2. Page number 1 of 1 should be recorded unless a continuation sheet is used, in which case the total number of pages, counting the initial manifest page, should be shown.

Item 3. Enter the name of the generator and the mailing address to which the manifest should be mailed. If the address of the site at which the waste was placed into transportation is different from the mailing address record the site address in Item J.

Item 4. Enter a telephone number (including area code) where an authorized agent of the generator can be reached in the event of an emergency and/or a partial or total rejected load.

NOTE: The 24 hour emergency phone number required for a hazardous materials shipping paper may be different from the generator's phone number.

Item 5. Enter the company name of the first transporter who will transport the waste.

Item 6. Enter the transporter's U.S. EPA twelve digit identification number. For Part 121 manifested shipments where a transporter does not have a U.S. EPA assigned number, a state assigned number is to be used.

Item 7. If using a second transporter, enter the company name.

Item 8. Enter the second transporter's U.S. EPA twelve digit identification number. For Part 121 manifested shipments where a transporter does not have a U.S. EPA assigned number, a state number is to be used.

NOTE: If more than two transporters are used, the generator or third transporter shall initiate a continuation sheet. In Item L of the continuation sheet, the generator/transporter must copy the State manifest document number listed in Item A. Every transport company used between the generator and the designated facility (except for intermediate rail or barge transporters used between the initial rail or barge carriers and the designated facility) must be listed. This is not intended to require multiple signatures for individual drivers working for one transporter. Item 2 is to be changed to reflect the added page(s). Continuation sheets must be appropriately completed in their entirety and properly distributed. Continuation sheets may not be used to list additional waste streams.

Item 9. Enter the company name and site address of the facility designated to receive the waste listed on this manifest.

Item 10. Enter the U.S. EPA twelve digit identification number for the designated facility described in Item 9. For Part 121 manifested shipments where a designated facility does not have a U.S. EPA assigned number, a state assigned number is to be used.

Item 11. Enter an X in the HM box if the waste is a hazardous material regulate by U.S. DOT (See 49 CFR 172). Enter the required U.S. DOT shipping description, including Proper Shipping Name, Hazard Class or Division, ID Number (UN/NA), and packing group for each waste as identified in 49 CFR 172. Additional information may also be required in this space, including technical name and reportable quantity references. For only Part 121 regulated wastes include an appropriate shipping description for the waste stream.

Item 12. Enter the number of containers for each waste and the appropriate abbreviations listed below for the type of container. Each container type requires separate entry.

DM = Metal drums, barrels, kegs	CY = Cylinders
DW = Wooden drums, barrels, kegs	CM = Metal boxes, cartons, cases (including roll-offs)
DF = Fiberboard or plastic drums, barrels, kegs	CW = Wooden boxes, cartons, cases
DT = Dump truck	CF = Fiber or plastic boxes, cartons, cases
TP = Tanks, portable	BA = Burlap, cloth, paper / plastic bags
TT = Cargo tanks (tank trucks)	
TC = Tank cars	

Item 13. Enter the total quantity of waste described on each line. Do not use decimals or fractions.

Item 14. Enter the appropriate abbreviation for the unit of measure listed below.

G = Gallons (liquids only)	L = Liters (liquids only)
P = Pounds	K = Kilograms
T = Tons (2000 lbs.)	M = Metric tons (1000 kg)
Y = Cubic yards	N = Cubic meters

Item 15. The generator may use this space to indicate special transportation, treatment, storage or disposal information. Import/Export information as noted in the "International Shipment" instructions section is to be recorded here.

Item 16. The generator must read, print his/her name, sign and date the certification statement.

Item 17. Print the name of the person accepting the waste on behalf of the first transporter. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

Item 18. If applicable, print the name of the person accepting the waste on behalf of the second transporter. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

Item 19. An authorized representative of the designated (or alternate) facility must note in this space any discrepancy in the waste shipment.

Item 20. Print the name of the person accepting the waste on behalf of the designated facility. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

NOTE: MDEQ "Rejected Load Procedures" provides guidance for partial or total load rejections.

Only the following information in the shaded area is a State of Michigan requirement:

Item A. A preprinted State manifest document number.

Item B - H. May be required by other states.

Item I. For hazardous wastes, enter the appropriate waste numbers found in R299.9212 through R299.9214 of Part 111 and 40 CFR 261 Subparts C and D. If more than one waste number is required to appropriately identify the waste, enter the additional numbers in item J. In selecting the most appropriate waste number the following hierarchy must be used: acute waste (including P and acute F), U (toxic), K (specific sources), non-acute F (non-specific sources) and D (characteristic). State regulated wastes follow the same hierarchy as federally regulated wastes. For Part 121 wastes which are not hazardous wastes enter the appropriate code listed below.

Mixed Solvents	007L	Storm Sewer Cleanouts	031L
Pharmaceutical	014L	Sanitary Sewer Cleanouts	032L
Crankcase Oil	017L	X-Ray/Photo Solutions	033L
Coolants and Water Soluble Oils	019L	Water Based Cleaning Solutions	034L
Other Oil (Describe in Item 11 or Item J)	021L	Car Wash Sludges	035L
Brine	022L	Grease Trap Wastes	036L
PCB	026L		
Other Wastes (Describe in Item 11 or Item J)	029L		
Antifreeze	030L		

Item J. Generators are to use this space for the site address if different from the mailing address noted in Item 3, additional waste codes, additional description for a Part 121 waste as noted in Item I of these instructions, approval of commingling authority as required in R299.9304(6).

Item K. List any specific codes which apply.

Burned for Energy Recovery	B
Conditionally Exempt Small Quantity Generator	C
Emergency Response Cleanup	E
Household Generated	H
Recycled Precious Metals	P
Recycled, Reclaimed, Used or Reused	R
Universal Waste	U

INTERNATIONAL SHIPMENTS

Exports- Transporters must sign and enter the date the waste leaves the United States in Item 15. The primary exporter must identify the point of departure from the United States.*

Imports- Shipments of hazardous and Part 121 regulated wastes must be accompanied by a U.S. EPA Uniform Hazardous Waste Manifest. Any person functioning as the U.S. Importer, as defined in Part 111, must complete the manifest as required in R299.9310*

*Transporters of hazardous waste shipments must deliver a copy of the manifest to U.S. Customs when importing or exporting the waste across U.S. borders. Record the foreign waste manifest document number in ItemJ.

MANIFEST DISTRIBUTION

GENERATOR: Upon placing the waste into transportation (first transporter signs and dates manifest) remove the white and gold banded copies and give the remainder of the manifest copies to the transporter. Sent the white copy to MDEQ no later than the tenth day of the month following the shipment. For shipments of wastes being transported to a designated facility outside of Michigan when an out-of-state manifest is used, mail to the MDEQ a photocopy of the manifest when the shipment is placed into transportation and mail a photocopy of the second generator manifest copy, when received.

TRANSPORTER: Upon delivery to the designated (or alternate) facility, and that facility signs and dates the manifest, the canary banded copy will be returned to you. If more than one transporter is used, the manifest is to be copied and supplied to the previous transporter acknowledging the receipt of the shipment by the next transporter. The canary banded copy stays with the manifest until the shipment reaches the designated facility.

DESIGNATED FACILITY: Upon signing and dating the manifest as received, give the canary banded

ADDRESS ALL MDEQ MANIFEST COPIES TO:
WASTE MANAGEMENT DIVISION
MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
PO BOX 30038
LANSING MI 48909-7538

The public reporting burden for this collection of information is estimated to average 31 minutes for generators, 16 minutes for transporters, and 16 minutes for treatments, storage and disposal facilities. The record-keeping burden per response for this collection of information is estimated to average 6 minutes for generators, 6 minutes for transporters, and 6 minutes for treatment, storage and disposal facilities. The burden associated with reading the regulations is estimated at 1 hour and 15 minutes annually. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency.

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB numbers for EPA's regulations are listed in 40 CFR Part 9 and 48 CFR Chapter 15. Send comments regarding these burden estimates or any other aspect of this collection, including suggestions for reducing this burden, including through use of automated collection techniques to the Director, OPPE Regulatory Information Division, U.S. Environmental Protection Agency (2.37), 401 M St., S.W., Washington, D.C., 20460 and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Attention: Desk Officer for EPA, 725 17th Street, N.W., Washington, D.C. 20503. Include the OMB control number in any correspondence.

CERTIFICATE OF DISPOSAL

This certificate is to verify the wastes specified on Manifest # M19757371

have been properly disposed of in accordance with all local, state and federal regulations.

"Disposed of" means either: 1) Burial or 2) Processed as specified in 40 CFR et seq.

FACILITY NAME:
(Please check one)

☒ Michigan Disposal Waste Treatment Plant
(EPA I.D. # MID000724831)

☐ Wayne Disposal, Inc.
(EPA I.D. # MID048090633)

ADDRESS: 49350 N. I-94 Service Drive
Belleville, Michigan 48111

PHONE NUMBER: 1-800-592-5489

FAX NUMBER: 1-800-592-5329

Authorized Signature: _____

THE ENVIRONMENTAL QUALITY COMPANY 49350 N. I-94 SERVICE DRIVE BELLEVILLE MICHIGAN 48111

FORM1020 (3/96)

MI0012817

DEQ WASTE MANAGEMENT DIVISION
MICHIGAN DEPARTMENT OF
ENVIRONMENTAL QUALITY

DO NOT WRITE IN THIS SPACE
ATT. ☐ DIS. ☐ REJ. ☐ PR. ☐

Required under authority of Part 111 and Part 121 of Act 451, 1994, as amended.

Failure to file may subject you to criminal and/or civil penalties under Sections 324.11151 or 324.12116 MCL.

Please print or type.

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. MID005354386

Manifest Document No.

2. Page 1 of 1

Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address: WOLVERINE BASKET & MFG, 2630 PRINCESS, INKSTER, MI 48141

4. Generator's Phone (517) 610-1138 DOUG ROMMECK

A. State Manifest Document Number: MI 9757370

B. State Generator's ID

5. Transporter 1 Company Name: Sec

6. US EPA ID Number: MIR000039701

C. State Transporter's ID: 734-206-6509

D. Transporter's Phone

7. Transporter 2 Company Name

8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address: MICHIGAN DISPOSAL WASTE TREATMENT PLANT, 49350 NORTH 134 SERVICE DRIVE, BELLEVILLE, MICHIGAN 48111

10. US EPA ID Number: MID000724831

G. State Facility's ID

H. Facility's Phone: 800-592-5489

	HM	11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID NUMBER).	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	☐	NON RCRA/NON DOT REGULATED SOLIDS	001	DT		P	SLUD
b.	☐						
c.	☐						
d.	☐						

J. Additional Descriptions for Materials Listed Above
APPROVAL# 11A 101904TBB (CONTAMINATED SOIL)

K. Handling Codes
a
b
c
d

15. Special Handling Instructions and Additional Information

09086

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR; if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name	Signature	Date Month Day Year
Douglas Rommeck	[signature]	10 26 04

17. Transporter 1 Acknowledgment of Receipt of Materials

Printed/Typed Name	Signature	Date Month Day Year

18 Transporter 2 Acknowledgment of Receipt of Materials

Printed/Typed Name	Signature	Date Month Day Year

19. Discrepancy Indication Space

RCS

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Date Month Day Year

GENERATOR

TRANSPORTER

FACILITY

ALL SPILLS MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHIGAN AT 1-800-292-4706 OR OUT OF STATE AT 517-373-7660 AND THE NATIONAL RESPONSE CENTER AT 1-800-424-8802 24 HOUR PER DAY.

EPA Form 8700-22 (Rev. 9/88) GENERATOR 2nd COPY EQP 5110 Rev. 7/03

MI0012818

GENERAL INSTRUCTIONS

Read all instructions before completing this form. This form has been designed for use on a 12-pitch (elite) typewriter/computer printer; a firm point pen may also be used - press down hard. Ensure all copies are legible.

Federal and state regulations require generators and transporters of hazardous waste and owners or operators of hazardous waste treatment, storage, and disposal facilities to use this form (8700-22) and, if necessary, the continuation sheet (Form 8700-22A) for both inter- and intrastate transportation of hazardous waste as defined in 40 CFR and Part 111 of Act 451 of 1994, as amended (Part 111). State regulations also require the use of this manifest for all regulated shipments of liquid industrial waste as required in Part 121 of Act 451 of 1994, as amended (Part 121).

Federal and State regulations provide for additional requirements, not included in these instructions, regarding the use and management of this form (40 CFR, 49 CFR, Part 111, Part 121).

Additional information such as "Rejected Load Procedures", state assigned identification numbers, manifest forms, etc., can be obtained by contacting the Michigan Department of Environmental Quality (MDEQ), Waste Management Divisions (WMD) Internet Home Page at http://www.deq.state.mi.us/wmd or you may contact the Manifest Unit directly at (517) 373-1217. Continuation sheets are not supplied by MDEQ.

Complete all items on the manifest. Enter "N/A" if any item does not apply. Leave items that may be needed later blank, such as a second transporter.

Item 1. Enter the generator's U.S. EPA twelve digit identification number. For Part 121 manifested shipments where a generator does not have a U.S. EPA assigned number, a state assigned number must be obtained and used. The generator of the waste must enter a unique five digit manifest document number (e.g. 00001).

Item 2. Page number 1 of 1 should be recorded unless a continuation sheet is used, in which case the total number of pages, counting the initial manifest page, should be shown.

Item 3. Enter the name of the generator and the mailing address to which the manifest should be mailed. If the address of the site at which the waste was placed into transportation is different from the mailing address record the site address in item J.

Item 4. Enter a telephone number (including area code) where an authorized agent of the generator can be reached in the event of an emergency and/or a partial or total rejected load.

NOTE: The 24 hour emergency phone number required for a hazardous materials shipping paper may be different from the generator's phone number.

Item 5. Enter the company name of the first transporter who will transport the waste.

Item 6. Enter the transporter's U.S. EPA twelve digit identification number. For Part 121 manifested shipments where a transporter does not have a U.S. EPA assigned number, a state assigned number is to be used.

Item 7. If using a second transporter, enter the company name.

Item 8. Enter the second transporter's U.S. EPA twelve digit identification number. For Part 121 manifested shipments where a transporter does not have a U.S. EPA assigned number, a state number is to be used.

NOTE: If more than two transporters are used, the generator or third transporter shall initiate a continuation sheet. In Item L of the continuation sheet, the generator/transporter must copy the State manifest document number listed in Item A. Every transport company used between the generator and the designated facility (except for intermediate rail or barge transporters used between the initial rail or barge carriers and the designated facility) must be listed. This is not intended to require multiple signatures for individual drivers working for one transporter. Item 2 is to be changed to reflect the added page(s). Continuation sheets must be appropriately completed in their entirety and properly distributed. Continuation sheets may not be used to list additional waste streams.

Item 9. Enter the company name and site address of the facility designated to receive the waste listed on this manifest.

Item 10. Enter the U.S. EPA twelve digit identification number for the designated facility described in Item 9. For Part 121 manifested shipments where a designated facility does not have a U.S. EPA assigned number, a state assigned number is to be used.

Item 11. Enter an X in the HM box if the waste is a hazardous material regulate by U.S. DOT (See 49 CFR 172). Enter the required U.S. DOT shipping description, including Proper Shipping Name, Hazard Class or Division, ID Number (UN/NA), and packing group for each waste as identified in 49 CFR 172. Additional information may also be required in this space, including technical name and reportable quantity references. For only Part 121 regulated wastes include an appropriate shipping description for the waste stream.

Item 12. Enter the number of containers for each waste and the appropriate abbreviations listed below for the type of container. Each container type requires separate entry.

DM = Metal drums, barrels, kegs	CY = Cylinders
DW = Wooden drums, barrels, kegs	CM = Metal boxes, cartons, cases (including roll-offs)
DF = Fiberboard or plastic drums, barrels, kegs	CW = Wooden boxes, cartons, cases
DT = Dump truck	CF = Fiber or plastic boxes, cartons, cases
TP = Tanks, portable	BA = Burlap, cloth, paper / plastic bags
TT = Cargo tanks (tank trucks)	
TC = Tank cars	

Item 13. Enter the total quantity of waste described on each line. Do not use decimals or fractions.

Item 14. Enter the appropriate abbreviation for the unit of measure listed below.

G = Gallons (liquids only)	L = Liters (liquids only)
P = Pounds	K = Kilograms
T = Tons (2000 lbs.)	M = Metric tons (1000 kg)
Y = Cubic yards	N = Cubic meters

Item 15. The generator may use this space to indicate special transportation, treatment, storage or disposal information. Import/Export information as noted in the "International Shipment" instructions section is to be recorded here.

Item 16. The generator must read, print his/her name, sign and date the certification statement.

Item 17. Print the name of the person accepting the waste on behalf of the first transporter. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

Item 18. If applicable, print the name of the person accepting the waste on behalf of the second transporter. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

Item 19. An authorized representative of the designated (or alternate) facility must note in this space any discrepancy in the waste shipment.

Item 20. Print the name of the person accepting the waste on behalf of the designated facility. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

NOTE: MDEQ "Rejected Load Procedures" provides guidance for partial or total load rejections.

Only the following information in the shaded area is a State of Michigan requirement:

Item A. A preprinted State manifest document number.

Item B - H. May be required by other states.

Item I. For hazardous wastes, enter the appropriate waste numbers found in R299.9212 through R299.9214 of Part 111 and 40 CFR 261 Subparts C and D. If more than one waste number is required to appropriately identify the waste, enter the additional numbers in item J. In selecting the most appropriate waste number the following hierarchy must be used: acute waste (including P and acute F), U (toxic), K (specific sources), non-acute F (non-specific sources) and D (characteristic). State regulated wastes follow the same hierarchy as federally regulated wastes. For Part 121 wastes which are not hazardous wastes enter the appropriate code listed below.

Mixed Solvents	007L	Storm Sewer Cleanouts	031L
Pharmaceutical	014L	Sanitary Sewer Cleanouts	032L
Crankcase Oil	017L	X-Ray/Photo Solutions	033L
Coolants and Water Soluble Oils	019L	Water Based Cleaning Solutions	034L
Other Oil (Describe in Item 11 or Item J)	021L	Car Wash Sludges	035L
Brine	022L	Grease Trap Wastes	036L
PCB	026L		
Other Wastes (Describe in Item 11 or Item J)	029L		
Antifreeze	030L		

Item J. Generators are to use this space for the site address if different from the mailing address noted in Item 3; additional waste codes, additional description for a Part 121 waste as noted in Item I of these instructions, approval of commingling authority as required in R299.9304(6).

Item K. List any specific codes which apply.

Burned for Energy Recovery	B
Conditionally Exempt Small Quantity Generator	C
Emergency Response Cleanup	E
Household Generated	H
Recycled Precious Metals	P
Recycled, Reclaimed, Used or Reused	R
Universal Waste	U

INTERNATIONAL SHIPMENTS

Exports- Transporters must sign and enter the date the waste leaves the United States in Item 15. The primary exporter must identify the point of departure from the United States.*

Imports- Shipments of hazardous and Part 121 regulated wastes must be accompanied by a U.S. EPA Uniform Hazardous Waste Manifest. Any person functioning as the U.S. importer as defined in Part 111, must complete the manifest as required in R299.9310*

*Transporters of hazardous waste shipments must deliver a copy of the manifest to U.S. Customs when importing or exporting the waste across U.S. borders. Record the foreign waste manifest document number in Item J.

MANIFEST DISTRIBUTION

GENERATOR: Upon placing the waste into transportation (first transporter signs and dates manifest), remove the white and gold banded copies and give the remainder of the manifest copies to the transporter. Sent the white copy to MDEQ no later than the tenth day of the month following the shipment. For shipments of wastes being transported to a designated facility outside of Michigan when an out-of-state manifest is used, mail to the MDEQ a photocopy of the manifest when the shipment is placed into transportation and mail a photocopy of the second generator manifest copy, when received.

TRANSPORTER: Upon delivery to the designated (or alternate) facility, and that facility signs and dates the manifest, the canary banded copy will be returned to you. If more than one transporter is used, the manifest is to be copied and supplied to the previous transporter acknowledging the receipt of the shipment by the next transporter. The canary banded copy stays with the manifest until the shipment reaches the designated facility.

DESIGNATED FACILITY: Upon signing and dating the manifest as received, give the canary banded

ADDRESS ALL MDEQ MANIFEST COPIES TO:
WASTE MANAGEMENT DIVISION
MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
PO BOX 30038
LANSING MI 48909-7538

The public reporting burden for this collection of information is estimated to average 31 minutes for generators, 16 minutes for transporters, and 16 minutes for treatment, storage and disposal facilities. The record-keeping burden per response for this collection of information is estimated to average 6 minutes for generators, 6 minutes for transporters, and 6 minutes for treatment, storage and disposal facilities. The burden associated with reading the regulations is estimated at 1 hour and 15 minutes annually. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency.

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB numbers for EPA's regulations are listed in 40 CFR Part 9 and 48 CFR Chapter 15. Send comments regarding these burden estimates or any other aspect of this collection, including suggestions for reducing the burden, including through use of automated collection techniques to the Director, OPPE Regulatory Information Division, U.S. Environmental Protection Agency (2137), 401 M St., S.W., Washington, D.C., 20460 and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Attention: Desk Officer for EPA, 725 17th Street, N.W., Washington, D.C. 20503. Include the OMB control number in any correspondence.

DEQ WASTE MANAGEMENT DIVISION
MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY

DO NOT WRITE IN THIS SPACE
ATT. ☐ DIS. ☐ REJ. ☐ PR. ☐

Required under authority of Part 111 and Part 121 of Act 451, 1994, as amended.

Failure to file may subject you to criminal and/or civil penalties under Sections 324.11151 or 324.12116 MCL.

Please print or type.

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. MID005354366
Manifest Document No.
2. Page 1 of 1
Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
WOLVERINE GASKET & MFG
2838 PRINCESS
INKSTER, MI 48141
4. Generator's Phone (517) 810-1138 DOUG ROMMECK

A. State Manifest Document Number MI 9757370
B. State Generator's ID

5. Transporter 1 Company Name
6. US EPA ID Number MIR000030701
C. State Transporter's ID
D. Transporter's Phone

7. Transporter 2 Company Name
8. US EPA ID Number
E. State Transporter's ID
F. Transporter's Phone

9. Designated Facility Name and Site Address
MICHIGAN DISPOSAL WASTE TREATMENT PLANT
43950 NORTH 194 SERVICE DRIVE
BELLEVILLE, MICHIGAN 48111
10. US EPA ID Number MID000724831
G. State Facility's ID
H. Facility's Phone 800-592-5489

	HM	11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID NUMBER).	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	☐	NON RCRA/NON DOT REGULATED SOLIDS	001	DT		P	SLUD
b.	☐						
c.	☐						
d.	☐						

J. Additional Descriptions for Materials Listed Above
APPROVAL# 11A 101904TBB (CONTAMINATED SOIL)

K. Handling Codes
a
b
c
d

15. Special Handling Instructions and Additional Information
0908b

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR; if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: Doug Rommeck
Signature:
Date: Month 10 Day 26 Year 04

17. Transporter 1 Acknowledgment of Receipt of Materials
Printed/Typed Name
Signature
Date: Month Day Year

18 Transporter 2 Acknowledgment of Receipt of Materials
Printed/Typed Name
Signature
Date: Month Day Year

19. Discrepancy Indication Space
RCS

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name
Signature
Date: Month Day Year

GENERATOR

TRANSPORTER

FACILITY

ALL SPILLS MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHIGAN AT 1-800-292-4706 OR OUT OF STATE AT 517-373-7660 AND THE NATIONAL RESPONSE CENTER AT 1-800-424-8802 24 HOUR PER DAY.

EPA Form 8700-22 (Rev. 9/88)

GENERATOR 1st COPY

EQP 5110 Rev. 7/03

MI0012820

GENERAL INSTRUCTIONS

Read all instructions before completing this form. This form has been designed for use on a 12-pitch (elite) typewriter/computer printer: a firm point pen may also be used - press down hard. Ensure all copies are legible.

Federal and state regulations require generators and transporters of hazardous waste and owners or operators of hazardous waste treatment, storage, and disposal facilities to use this form (8700-22) and, if necessary, the continuation sheet (Form 8700-22A) for both inter- and intrastate transportation of hazardous waste as defined in 40 CFR and Part 111 of Act 451 of 1994, as amended (Part 111). State regulations also require the use of this manifest for all regulated shipments of liquid industrial waste as required in Part 121 of Act 451 of 1994, as amended (Part 121).

Federal and State regulations provide for additional requirements, not included in these instructions, regarding the use and management of this form (40 CFR, 49 CFR, Part 111, Part 121).

Additional information such as "Rejected Load Procedures", state assigned identification numbers, manifest forms, etc., can be obtained by contacting the Michigan Department of Environmental Quality (MDEQ), Waste Management Divisions (WMD) Internet Home Page at http://www.deq.state.mi.us/wmd or you may contact the Manifest Unit directly at (517) 373-1217. Continuation sheets are not supplied by MDEQ.

Complete all items on the manifest. Enter "N/A" if any item does not apply. Leave items that may be needed later blank, such as a second transporter.

Item 1. Enter the generator's U.S. EPA twelve digit identification number. For Part 121 manifested shipments where a generator does not have a U.S. EPA assigned number, a state assigned number must be obtained and used. The generator of the waste must enter a unique five digit manifest document number (e.g. 00001).

Item 2. Page number 1 of 1 should be recorded unless a continuation sheet is used, in which case the total number of pages, counting the initial manifest page, should be shown.

Item 3. Enter the name of the generator and the mailing address to which the manifest should be mailed. If the address of the site at which the waste was placed into transportation is different from the mailing address record the site address in item J.

Item 4. Enter a telephone number (including area code) where an authorized agent of the generator can be reached in the event of an emergency and/or a partial or total rejected load.

NOTE: The 24 hour emergency phone number required for a hazardous materials shipping paper may be different from the generator's phone number.

Item 5. Enter the company name of the first transporter who will transport the waste.

Item 6. Enter the transporter's U.S. EPA twelve digit identification number. For Part 121 manifested shipments where a transporter does not have a U.S. EPA assigned number, a state assigned number is to be used.

Item 7. If using a second transporter, enter the company name.

Item 8. Enter the second transporter's U.S. EPA twelve digit identification number. For Part 121 manifested shipments where a transporter does not have a U.S. EPA assigned number, a state number is to be used.

NOTE: If more than two transporters are used, the generator or third transporter shall initiate a continuation sheet. In Item L of the continuation sheet, the generator/transporter must copy the State manifest document number listed in Item A. Every transport company used between the generator and the designated facility (except for intermediate rail or barge transporters used between the initial rail or barge carriers and the designated facility) must be listed. This is not intended to require multiple signatures for individual drivers working for one transporter. Item 2 is to be changed to reflect the added page(s). Continuation sheets must be appropriately completed in their entirety and properly distributed. Continuation sheets may not be used to list additional waste streams.

Item 9. Enter the company name and site address of the facility designated to receive the waste listed on this manifest.

Item 10. Enter the U.S. EPA twelve digit identification number for the designated facility described in Item 9. For Part 121 manifested shipments where a designated facility does not have a U.S. EPA assigned number, a state assigned number is to be used.

Item 11. Enter an X in the HM box if the waste is a hazardous material regulate by U.S. DOT (See 49 CFR 172). Enter the required U.S. DOT shipping description, including Proper Shipping Name, Hazard Class or Division, ID Number (UN/NA), and packing group for each waste as identified in 49 CFR 172. Additional information may also be required in this space, including technical name and reportable quantity references. For only Part 121 regulated wastes include an appropriate shipping description for the waste stream.

Item 12. Enter the number of containers for each waste and the appropriate abbreviations listed below for the type of container. Each container type requires separate entry.

DM = Metal drums, barrels, kegs	CY = Cylinders
DW = Wooden drums, barrels, kegs	CM = Metal boxes, cartons, cases (including roll-offs)
DF = Fiberboard or plastic drums, barrels, kegs	CW = Wooden boxes, cartons, cases
DT = Dump truck	CF = Fiber or plastic boxes, cartons, cases
TP = Tanks, portable	BA = Burlap, cloth, paper / plastic bags
TT = Cargo tanks (tank trucks)	
TC = Tank cars	

Item 13. Enter the total quantity of waste described on each line. Do not use decimals or fractions.

Item 14. Enter the appropriate abbreviation for the unit of measure listed below.

G = Gallons (liquids only)	L = Liters (liquids only)
P = Pounds	K = Kilograms
T = Tons (2000 lbs.)	M = Metric tons (1000 kg)
Y = Cubic yards	N = Cubic meters

Item 15. The generator may use this space to indicate special transportation, treatment, storage or disposal information. Import/Export information as noted in the "International Shipment" instructions section is to be recorded here.

Item 16. The generator must read, print his/her name, sign and date the certification statement.

Item 17. Print the name of the person accepting the waste on behalf of the first transporter. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

Item 18. If applicable, print the name of the person accepting the waste on behalf of the second transporter. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

Item 19. An authorized representative of the designated (or alternate) facility must note in this space any discrepancy in the waste shipment.

Item 20. Print the name of the person accepting the waste on behalf of the designated facility. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

NOTE: MDEQ "Rejected Load Procedures" provides guidance for partial or total load rejections.

Only the following information in the shaded area is a State of Michigan requirement:

Item A. A preprinted State manifest document number.

Item B - H. May be required by other states.

Item I. For hazardous wastes, enter the appropriate waste numbers found in R299.9212 through R299.9214 of Part 111 and 40 CFR 261 Subparts C and D. If more than one waste number is required to appropriately identify the waste, enter the additional numbers in item J. In selecting the most appropriate waste number the following hierarchy must be used: acute waste (including P and acute F), U (toxic), K (specific sources), non-acute F (non-specific sources) and D (characteristic). State regulated wastes follow the same hierarchy as federally regulated wastes. For Part 121 wastes which are not hazardous wastes enter the appropriate code listed below.

Mixed Solvents	007L	Storm Sewer Cleanouts	031L
Pharmaceutical	014L	Sanitary Sewer Cleanouts	032L
Crankcase Oil	017L	X-Ray/Photo Solutions	033L
Coolants and Water Soluble Oils	019L	Water Based Cleaning Solutions	034L
Other Oil (Describe in Item 11 or Item J)	021L	Car Wash Sludges	035L
Brine	022L	Grease Trap Wastes	036L
PCB	026L		
Other Wastes (Describe in Item 11 or Item J)	029L		
Antifreeze	030L		

Item J. Generators are to use this space for the site address if different from the mailing address noted in Item 3, additional waste codes, additional description for a Part 121 waste as noted in Item I of these instructions, approval of commingling authority as required in R299.9304(6).

Item K. List any specific codes which apply.

Burned for Energy Recovery	B
Conditionally Exempt Small Quantity Generator	C
Emergency Response Cleanup	E
Household Generated	H
Recycled Precious Metals	P
Recycled, Reclaimed, Used or Reused	R
Universal Waste	U

INTERNATIONAL SHIPMENTS

Exports- Transporters must sign and enter the date the waste leaves the United States in Item 15. The primary exporter must identify the point of departure from the United States.*

Imports- Shipments of hazardous and Part 121 regulated wastes must be accompanied by a U.S. EPA Uniform Hazardous Waste Manifest. Any person functioning as the U.S. Importer, as defined in Part 111, must complete the manifest as required in R299.9310*

*Transporters of hazardous waste shipments must deliver a copy of the manifest to U.S. Customs when importing or exporting the waste across U.S. borders. Record the foreign waste manifest document number in Item J.

MANIFEST DISTRIBUTION

GENERATOR: Upon placing the waste into transportation (first transporter signs and dates manifest) remove the white and gold banded copies and give the remainder of the manifest copies to the transporter. Sent the white copy to MDEQ no later than the tenth day of the month following the shipment. For shipments of wastes being transported to a designated facility outside of Michigan when an out-of-state manifest is used, mail to the MDEQ a photocopy of the manifest when the shipment is placed into transportation and mail a photocopy of the second generator manifest copy, when received.

TRANSPORTER: Upon delivery to the designated (or alternate) facility, and that facility signs and dates the manifest, the canary banded copy will be returned to you. If more than one transporter is used, the manifest is to be copied and supplied to the previous transporter acknowledging the receipt of the shipment by the next transporter. The canary banded copy stays with the manifest until the shipment reaches the designated facility.

DESIGNATED FACILITY: Upon signing and dating the manifest as received, give the canary banded

ADDRESS ALL MDEQ MANIFEST COPIES TO:
WASTE MANAGEMENT DIVISION
MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
PO BOX 30038
LANSING MI 48909-7538

The public reporting burden for this collection of information is estimated to average 31 minutes for generators, 18 minutes for transporters, and 16 minutes for treatment, storage and disposal facilities. The record-keeping burden per response for this collection of information is estimated to average 6 minutes for generators, 6 minutes for transporters, and 6 minutes for treatment, storage and disposal facilities. The burden associated with reading the regulations is estimated at 1 hour and 15 minutes annually. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency.

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB numbers for EPA's regulations are listed in 40 CFR Part 9 and 48 CFR Chapter 15. Send comments regarding these burden statements or any other aspect of this collection, including suggestions for reducing the burden, including through use of automated collection techniques to the Director, OPPE Regulatory Information Division, U.S. Environmental Protection Agency (2 37), 401 M St., S.W., Washington, D.C., 20460 and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Attention: Desk Officer for EPA, 725 17th Street, N.W., Washington, D.C. 20503. Include the OMB control number in any correspondence.

CERTIFICATE OF DISPOSAL

This certificate is to verify the wastes specified on Manifest # MI9757370

have been properly disposed of in accordance with all local, state and federal regulations.

"Disposed of" means either: 1) Burial or 2) Processed as specified in 40 CFR et seq.

FACILITY NAME: *(Please check one)*

☑ Michigan Disposal Waste Treatment Plant (EPA I.D. # MID000724831)

☐ Wayne Disposal, Inc. (EPA I.D. # MID048090633)

ADDRESS: 49350 N. I-94 Service Drive
Belleville, Michigan 48111

PHONE NUMBER: 1-800-592-5489

FAX NUMBER: 1-800-592-5329

Authorized Signature: _____

THE ENVIRONMENTAL QUALITY COMPANY 49350 N. I-94 SERVICE DRIVE BELLEVILLE MICHIGAN 48111

FORM1020 (3/96)

MI0012822

DEQ WASTE MANAGEMENT DIVISION
MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY

DO NOT WRITE IN THIS SPACE
ATT. ☐ DIS. ☐ REJ. ☐ PR. ☐

Required under authority of Part 111 and Part 121 of Act 451, 1994, as amended.

Failure to file may subject you to criminal and/or civil penalties under Sections 324.11151 or 324.12116 MCL.

Please print or type.

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. MID005354386

Manifest Document No.

2. Page 1 of 1

Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
WOLVERINE GASKET & MFG.
2639 PRINCESS
INKSTER, MI 48141

4. Generator's Phone ( )517 610-1138 DOUG ROMMECK

A. State Manifest Document Number MI 9757369

B. State Generator's ID

5. Transporter 1 Company Name S&C

6. US EPA ID Number MIR000039701

C. State Transporter's ID

D. Transporter's Phone 734-200-6000

7. Transporter 2 Company Name

8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address
MICHIGAN DISPOSAL WASTE TREATMENT PLANT
49350 NORTH I94 SERVICE DRIVE
BELLEVILLE, MICHIGAN 48111

10. US EPA ID Number MID000724831

G. State Facility's ID

H. Facility's Phone 800-592-5489

	HM	11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID NUMBER).	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	☐	NON RCRA/NON DOT REGULATED SOLIDS	001	DT		P	SLUD
b.	☐						
c.	☐						
d.	☐						

J. Additional Descriptions for Materials Listed Above
APPROVAL# 11A 101904TBB (CONTAMINATED SOIL)

K. Handling Codes
a
b
c
d

15. Special Handling Instructions and Additional Information

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR; if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: Douglas Rommeck
Signature: [signature]
Date: Month 10 Day 24 Year 04

17. Transporter 1 Acknowledgment of Receipt of Materials
Printed/Typed Name: [signature]
Signature: [signature]
Date: Month 10 Day 24 Year 04

18 Transporter 2 Acknowledgment of Receipt of Materials
Printed/Typed Name
Signature
Date: Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name
Signature
Date: Month Day Year

GENERATOR

TRANSPORTER

FACILITY

ALL SPILLS MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHIGAN AT 1-800-292-4706 OR OUT OF STATE AT 517-373-7660 AND THE NATIONAL RESPONSE CENTER AT 1-800-424-8802 24 HOUR PER DAY.

EPA Form 8700-22 (Rev. 9/88) GENERATOR 2nd COPY EQP 5110 Rev. 7/03

MI0012823

GENERAL INSTRUCTIONS

Read all instructions before completing this form. This form has been designed for use on a 12-pitch (elite) typewriter/computer printer: a firm point pen may also be used - press down hard. Ensure all copies are legible.

Federal and state regulations require generators and transporters of hazardous waste and owners or operators of hazardous waste treatment, storage, and disposal facilities to use this form (8700-22) and, if necessary, the continuation sheet (Form 8700-22A) for both inter- and intrastate transportation of hazardous waste as defined in 40 CFR and Part 111 of Act 451 of 1994, as amended (Part 111). State regulations also require the use of this manifest for all regulated shipments of liquid industrial waste as required in Part 121 of Act 451 of 1994, as amended (Part 121).

Federal and State regulations provide for additional requirements, not included in these instructions, regarding the use and management of this form (40 CFR, 49 CFR, Part 111, Part 121).

Additional information such as "Rejected Load Procedures", state assigned identification numbers, manifest forms, etc., can be obtained by contacting the Michigan Department of Environmental Quality (MDEQ), Waste Management Divisions (WMD) Internet Home Page at http://www.deq.state.mi.us/wmd or you may contact the Manifest Unit directly at (517) 373-1217. Continuation sheets are not supplied by MDEQ.

Complete all items on the manifest. Enter "N/A" if any item does not apply. Leave items that may be needed later blank, such as a second transporter.

Item 1. Enter the generator's U.S. EPA twelve digit identification number. For Part 121 manifested shipments where a generator does not have a U.S. EPA assigned number, a state assigned number must be obtained and used. The generator of the waste must enter a unique five digit manifest document number (e.g. 00001).

Item 2. Page number 1 of 1 should be recorded unless a continuation sheet is used, in which case the total number of pages, counting the initial manifest page, should be shown.

Item 3. Enter the name of the generator and the mailing address to which the manifest should be mailed. If the address of the site at which the waste was placed into transportation is different from the mailing address record the site address in Item J.

Item 4. Enter a telephone number (including area code) where an authorized agent of the generator can be reached in the event of an emergency and/or a partial or total rejected load.

NOTE: The 24 hour emergency phone number required for a hazardous materials shipping paper may be different from the generator's phone number.

Item 5. Enter the company name of the first transporter who will transport the waste.

Item 6. Enter the transporter's U.S. EPA twelve digit identification number. For Part 121 manifested shipments where a transporter does not have a U.S. EPA assigned number, a state assigned number is to be used.

Item 7. If using a second transporter, enter the company name.

Item 8. Enter the second transporter's U.S. EPA twelve digit identification number. For Part 121 manifested shipments where a transporter does not have a U.S. EPA assigned number, a state number is to be used.

NOTE: If more than two transporters are used, the generator or third transporter shall initiate a continuation sheet. In Item L of the continuation sheet, the generator/transporter must copy the State manifest document number listed in Item A. Every transport company used between the generator and the designated facility (except for intermediate rail or barge transporters used between the initial rail or barge carriers and the designated facility) must be listed. This is not intended to require multiple signatures for individual drivers working for one transporter. Item 2 is to be changed to reflect the added page(s). Continuation sheets must be appropriately completed in their entirety and properly distributed. Continuation sheets may not be used to list additional waste streams.

Item 9. Enter the company name and site address of the facility designated to receive the waste listed on this manifest.

Item 10. Enter the U.S. EPA twelve digit identification number for the designated facility described in Item 9. For Part 121 manifested shipments where a designated facility does not have a U.S. EPA assigned number, a state assigned number is to be used.

Item 11. Enter an X in the HM box if the waste is a hazardous material regulate by U.S. DOT (See 49 CFR 172). Enter the required U.S. DOT shipping description, including Proper Shipping Name, Hazard Class or Division, ID Number (UN/NA), and packing group for each waste as identified in 49 CFR 172. Additional information may also be required in this space, including technical name and reportable quantity references. For only Part 121 regulated wastes include an appropriate shipping description for the waste stream.

Item 12. Enter the number of containers for each waste and the appropriate abbreviations listed below for the type of container. Each container type requires separate entry.

DM = Metal drums, barrels, kegs	CY = Cylinders
DW = Wooden drums, barrels, kegs	CM = Metal boxes, cartons, cases (including roll-offs)
DF = Fiberboard or plastic drums, barrels, kegs	CW = Wooden boxes, cartons, cases
DT = Dump truck	CF = Fiber or plastic boxes, cartons, cases
TP = Tanks, portable	BA = Burlap, cloth, paper / plastic bags
TT = Cargo tanks (tank trucks)	
TC = Tank cars	

Item 13. Enter the total quantity of waste described on each line. Do not use decimals or fractions.

Item 14. Enter the appropriate abbreviation for the unit of measure listed below.

G = Gallons (liquids only)	L = Liters (liquids only)
P = Pounds	K = Kilograms
T = Tons (2000 lbs.)	M = Metric tons (1000 kg)
Y = Cubic yards	N = Cubic meters

Item 15. The generator may use this space to indicate special transportation, treatment, storage or disposal information. Import/Export information as noted in the "International Shipment" instructions section is to be recorded here.

Item 16: The generator must read, print his/her name, sign and date the certification statement.

Item 17. Print the name of the person accepting the waste on behalf of the first transporter. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

Item 18. If applicable, print the name of the person accepting the waste on behalf of the second transporter. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

Item 19. An authorized representative of the designated (or alternate) facility must note in this space any discrepancy in the waste shipment.

Item 20. Print the name of the person accepting the waste on behalf of the designated facility. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

NOTE: MDEQ "Rejected Load Procedures" provides guidance for partial or total load rejections.

Only the following information in the shaded area is a State of Michigan requirement:

Item A: A preprinted State manifest document number.

Item B - H. May be required by other states.

Item I. For hazardous wastes, enter the appropriate waste numbers found in R299.9212 through R299.9214 of Part 111 and 40 CFR 261 Subparts C and D. If more than one waste number is required to appropriately identify the waste, enter the additional numbers in Item J. In selecting the most appropriate waste number the following hierarchy must be used: acute waste (including P and acute F), U (toxic), K (specific sources), non-acute F (non-specific sources) and D (characteristic). State regulated wastes follow the same hierarchy as federally regulated wastes. For Part 121 wastes which are not hazardous wastes enter the appropriate code listed below.

Mixed Solvents	007L	Storm Sewer Cleanouts	031L
Pharmaceutical	014L	Sanitary Sewer Cleanouts	032L
Crankcase Oil	017L	X-Ray/Photo Solutions	033L
Coolants and Water Soluble Oils	019L	Water Based Cleaning Solutions	034L
Other Oil (Describe in Item 11 or Item J)	021L	Car Wash Sludges	035L
Brine	022L	Grease Trap Wastes	036L
PCB	026L		
Other Wastes (Describe in Item 11 or Item J)	029L		
Antifreeze	030L		

Item J. Generators are to use this space for the site address if different from the mailing address noted in Item 3, additional waste codes, additional description for a Part 121 waste as noted in Item I of these instructions, approval of commingling authority as required in R299.9304(6).

Item K. List any specific codes which apply.

Burned for Energy Recovery	B
Conditionally Exempt Small Quantity Generator	C
Emergency Response Cleanup	E
Household Generated	H
Recycled Precious Metals	P
Recycled, Reclaimed, Used or Reused	R
Universal Waste	U

INTERNATIONAL SHIPMENTS

Exports- Transporters must sign and enter the date the waste leaves the United States in Item 15. The primary exporter must identify the point of departure from the United States.*

Imports- Shipments of hazardous and Part 121 regulated wastes must be accompanied by a U.S. EPA Uniform Hazardous Waste Manifest. Any person functioning as the U.S. Importer, as defined in Part 111, must complete the manifest as required in R299.9310*

*Transporters of hazardous waste shipments must deliver a copy of the manifest to U.S. Customs when importing or exporting the waste across U.S. borders. Record the foreign waste manifest document number in Item J.

MANIFEST DISTRIBUTION

GENERATOR: Upon placing the waste into transportation (first transporter signs and dates manifest) remove the white and gold banded copies and give the remainder of the manifest copies to the transporter. Sent the white copy to MDEQ no later than the tenth day of the month following the shipment. For shipments of wastes being transported to a designated facility outside of Michigan when an out-of-state manifest is used, mail to the MDEQ a photocopy of the manifest when the shipment is placed into transportation and mail a photocopy of the second generator manifest copy, when received.

TRANSPORTER: Upon delivery to the designated (or alternate) facility, and that facility signs and dates the manifest, the canary banded copy will be returned to you. If more than one transporter is used, the manifest is to be copied and supplied to the previous transporter acknowledging the receipt of the shipment by the next transporter. The canary banded copy stays with the manifest until the shipment reaches the designated facility.

DESIGNATED FACILITY: Upon signing and dating the manifest as received, give the canary banded.

ADDRESS ALL MDEQ MANIFEST COPIES TO:
WASTE MANAGEMENT DIVISION
MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
PO BOX 30038
LANSING MI 48909-7538

The public reporting burden for this collection of information is estimated to average 31 minutes for generators, 16 minutes for transporters, and 15 minutes for treatment, storage and disposal facilities. The record-keeping burden per response for this collection of information is estimated to average 6 minutes for generators, 5 minutes for transporters, and 6 minutes for treatment, storage and disposal facilities. The burden associated with reading the regulations is estimated at 1 hour and 15 minutes annually. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency.

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB numbers for EPA's regulations are listed in 40 CFR Part 9 and 48 CFR Chapter 15. Send comments regarding these burden statements or any other aspect of this collection, including suggestions for reducing the burden, including through use of automated collection techniques to the Director, OPPE Regulatory Information Division, U.S. Environmental Protection Agency (2 37), 401 M St., S.W., Washington, D.C., 20460 and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Attention: Desk Officer for EPA, 725 17th Street, N.W., Washington, D.C. 20503. Include the OMB control number in any correspondence.

Required under authority of Part 111 and Part 121 of Act 451, 1994, as amended.

Failure to file may subject you to criminal and/or civil penalties under Sections 324.11151 or 324.12116 MCL.

DEQ WASTE MANAGEMENT DIVISION
MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY

DO NOT WRITE IN THIS SPACE
ATT. ☐ DIS. ☐ REJ. ☐ PR. ☐

Please print or type.

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: MID005354386
Manifest Document No.:
2. Page 1 of 1
Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
WOLVERINE GASKET & MFG.
2838 PRINCESS
INKSTER, MI 48141

4. Generator's Phone ( ) 517 610-1138 DOUG ROMMECK

A. State Manifest Document Number: MI 9757369
B. State Generator's ID:

5. Transporter 1 Company Name: S&C
6. US EPA ID Number: MIR000039701
C. State Transporter's ID:
D. Transporter's Phone: 734-[illegible]

7. Transporter 2 Company Name:
8. US EPA ID Number:
E. State Transporter's ID:
F. Transporter's Phone:

9. Designated Facility Name and Site Address
MICHIGAN DISPOSAL WASTE TREATMENT PLANT
49350 NORTH I94 SERVICE DRIVE
BELLEVILLE, MICHIGAN 48111

10. US EPA ID Number: MID000724831
G. State Facility's ID:
H. Facility's Phone: 800-592-5489

	HM	11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID NUMBER).	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	☐	NON RCRA/NON DOT REGULATED SOLIDS	001	DT		P	SLUD
b.	☐						
c.	☐						
d.	☐						

J. Additional Descriptions for Materials Listed Above
APPROVAL# 11A [illegible] (CONTAMINATED SOIL)

K. Handling Codes
a
b
c
d

15. Special Handling Instructions and Additional Information

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR; if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: Douglas Rommeck
Signature: [signature]
Date: Month 10 Day 04 Year 07

17. Transporter 1 Acknowledgment of Receipt of Materials
Printed/Typed Name: [illegible]
Signature: [illegible]
Date: Month 10 Day 04 Year 07

18 Transporter 2 Acknowledgment of Receipt of Materials
Printed/Typed Name:
Signature:
Date: Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name:
Signature:
Date: Month Day Year

GENERATOR / TRANSPORTER / FACILITY

ALL SPILLS MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHIGAN AT 1-800-292-4706 OR OUT OF STATE AT 517-373-7660 AND THE NATIONAL RESPONSE CENTER AT 1-800-424-8802 24 HOUR PER DAY.

EPA Form 8700-22 (Rev. 9/88)

GENERATOR 1st COPY

EQP 5110 Rev. 7/03

MI0012825

GENERAL INSTRUCTIONS

Read all instructions before completing this form. This form has been designed for use on a 12-pitch (elite) typewriter/computer printer: a firm point pen may also be used - press down hard. Ensure all copies are legible.

Federal and state regulations require generators and transporters of hazardous waste and owners or operators of hazardous waste treatment, storage, and disposal facilities to use this form (8700-22) and, if necessary, the continuation sheet (Form 8700-22A) for both inter- and intrastate transportation of hazardous waste as defined in 40 CFR and Part 111 of Act 451 of 1994, as amended (Part 111). State regulations also require the use of this manifest for all regulated shipments of liquid industrial waste as required in Part 121 of Act 451 of 1994, as amended (Part 121).

Federal and State regulations provide for additional requirements, not included in these instructions, regarding the use and management of this form (40 CFR, 49 CFR, Part 111, Part 121).

Additional information such as "Rejected Load Procedures", state assigned identification numbers, manifest forms, etc., can be obtained by contacting the Michigan Department of Environmental Quality (MDEQ), Waste Management Divisions (WMD) Internet Home Page at http://www.deq.state.mi.us/wmd or you may contact the Manifest Unit directly at (517) 373-1217. Continuation sheets are not supplied by MDEQ.

Complete all items on the manifest. Enter "N/A" if any item does not apply. Leave items that may be needed later blank, such as a second transporter.

Item 1. Enter the generator's U.S. EPA twelve digit identification number. For Part 121 manifested shipments where a generator does not have a U.S. EPA assigned number, a state assigned number must be obtained and used. The generator of the waste must enter a unique five digit manifest document number (e.g. 00001).

Item 2. Page number 1 of 1 should be recorded unless a continuation sheet is used, in which case the total number of pages, counting the initial manifest page, should be shown.

Item 3. Enter the name of the generator and the mailing address to which the manifest should be mailed. If the address of the site at which the waste was placed into transportation is different from the mailing address record the site address in item J.

Item 4. Enter a telephone number (including area code) where an authorized agent of the generator can be reached in the event of an emergency and/or a partial or total rejected load.

NOTE: The 24 hour emergency phone number required for a hazardous materials shipping paper may be different from the generator's phone number.

Item 5. Enter the company name of the first transporter who will transport the waste.

Item 6. Enter the transporter's U.S. EPA twelve digit identification number. For Part 121 manifested shipments where a transporter does not have a U.S. EPA assigned number, a state assigned number is to be used.

Item 7. If using a second transporter, enter the company name.

Item 8. Enter the second transporter's U.S. EPA twelve digit identification number. For Part 121 manifested shipments where a transporter does not have a U.S. EPA assigned number, a state number is to be used.

NOTE: If more than two transporters are used, the generator or third transporter shall initiate a continuation sheet. In Item L of the continuation sheet, the generator/transporter must copy the State manifest document number listed in Item A. Every transport company used between the generator and the designated facility (except for intermediate rail or barge transporters used between the initial rail or barge carriers and the designated facility) must be listed. This is not intended to require multiple signatures for individual drivers working for one transporter. Item 2 is to be changed to reflect the added page(s). Continuation sheets must be appropriately completed in their entirety and properly distributed. Continuation sheets may not be used to list additional waste streams.

Item 9. Enter the company name and site address of the facility designated to receive the waste listed on this manifest.

Item 10. Enter the U.S. EPA twelve digit identification number for the designated facility described in Item 9. For Part 121 manifested shipments where a designated facility does not have a U.S. EPA assigned number, a state assigned number is to be used.

Item 11. Enter an X in the HM box if the waste is a hazardous material regulate by U.S. DOT (See 49 CFR 172). Enter the required U.S. DOT shipping description, including Proper Shipping Name, Hazard Class or Division, ID Number (UN/NA), and packing group for each waste as identified in 49 CFR 172. Additional information may also be required in this space, including technical name and reportable quantity references. For only Part 121 regulated wastes include an appropriate shipping description for the waste stream.

Item 12. Enter the number of containers for each waste and the appropriate abbreviations listed below for the type of container. Each container type requires separate entry.

DM = Metal drums, barrels, kegs	CY = Cylinders
DW = Wooden drums, barrels, kegs	CM = Metal boxes, cartons, cases (including roll-offs)
DF = Fiberboard or plastic drums, barrels, kegs	CW = Wooden boxes, cartons, cases
DT = Dump truck	CF = Fiber or plastic boxes, cartons, cases
TP = Tanks, portable	BA = Burlap, cloth, paper / plastic bags
TT = Cargo tanks (tank trucks)	
TC = Tank cars	

Item 13. Enter the total quantity of waste described on each line. Do not use decimals or fractions.

Item 14. Enter the appropriate abbreviation for the unit of measure listed below.

G = Gallons (liquids only)	L = Liters (liquids only)
P = Pounds	K = Kilograms
T = Tons (2000 lbs.)	M = Metric tons (1000 kg)
Y = Cubic yards	N = Cubic meters

Item 15. The generator may use this space to indicate special transportation, treatment, storage or disposal information. Import/Export information as noted in the "International Shipment" instructions section is to be recorded here.

Item 16. The generator must read, print his/her name, sign and date the certification statement.

Item 17. Print the name of the person accepting the waste on behalf of the first transporter. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

Item 18. If applicable, print the name of the person accepting the waste on behalf of the second transporter. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

Item 19. An authorized representative of the designated (or alternate) facility must note in this space any discrepancy in the waste shipment.

Item 20. Print the name of the person accepting the waste on behalf of the designated facility. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

NOTE: MDEQ "Rejected Load Procedures" provides guidance for partial or total load rejections.

Only the following information in the shaded area is a State of Michigan requirement:

Item A. A preprinted State manifest document number.

Item B - H. May be required by other states.

Item I. For hazardous wastes, enter the appropriate waste numbers found in R299.9212 through R299.9214 of Part 111 and 40 CFR 261 Subparts C and D. If more than one waste number is required to appropriately identify the waste, enter the additional numbers in item J. In selecting the most appropriate waste number the following hierarchy must be used: acute waste (including P and acute F), U (toxic), K (specific sources), non-acute F (non-specific sources) and D (characteristic). State regulated wastes follow the same hierarchy as federally regulated wastes. For Part 121 wastes which are not hazardous wastes enter the appropriate code listed below.

Mixed Solvents	007L	Storm Sewer Cleanouts	031L
Pharmaceutical	014L	Sanitary Sewer Cleanouts	032L
Crankcase Oil	017L	X-Ray/Photo Solutions	033L
Coolants and Water Soluble Oils	019L	Water Based Cleaning Solutions	034L
Other Oil (Describe in Item 11 or Item J)	021L	Car Wash Sludges	035L
Brine	022L	Grease Trap Wastes	036L
PCB	026L		
Other Wastes (Describe in Item 11 or Item J)	029L		
Antifreeze	030L		

Item J. Generators are to use this space for the site address if different from the mailing address noted in Item 3, additional waste codes, additional description for a Part 121 waste as noted in Item I of these instructions, approval of commingling authority as required in R299.9304(6).

Item K. List any specific codes which apply.

Burned for Energy Recovery	B
Conditionally Exempt Small Quantity Generator	C
Emergency Response Cleanup	E
Household Generated	H
Recycled Precious Metals	P
Recycled, Reclaimed, Used or Reused	R
Universal Waste	U

INTERNATIONAL SHIPMENTS

Exports- Transporters must sign and enter the date the waste leaves the United States in Item 15. The primary exporter must identify the point of departure from the United States.*

Imports- Shipments of hazardous and Part 121 regulated wastes must be accompanied by a U.S. EPA Uniform Hazardous Waste Manifest. Any person functioning as the U.S. Importer, as defined in Part 111, must complete the manifest as required in R299.9310*

*Transporters of hazardous waste shipments must deliver a copy of the manifest to U.S. Customs when importing or exporting the waste across U.S. borders. Record the foreign waste manifest document number in Item J.

MANIFEST DISTRIBUTION

GENERATOR: Upon placing the waste into transportation (first transporter signs and dates manifest) remove the white and gold banded copies and give the remainder of the manifest copies to the transporter. Sent the white copy to MDEQ no later than the tenth day of the month following the shipment. For shipments of wastes being transported to a designated facility outside of Michigan when an out-of-state manifest is used, mail to the MDEQ a photocopy of the manifest when the shipment is placed into transportation and mail a photocopy of the second generator manifest copy, when received.

TRANSPORTER: Upon delivery to the designated (or alternate) facility, and that facility signs and dates the manifest, the canary banded copy will be returned to you. If more than one transporter is used, the manifest is to be copied and supplied to the previous transporter acknowledging the receipt of the shipment by the next transporter. the canary banded copy stays with the manifest until the shipment reaches the designated facility.

DESIGNATED FACILITY: Upon signing and dating the manifest as received, give the canary banded

ADDRESS ALL MDEQ MANIFEST COPIES TO:
WASTE MANAGEMENT DIVISION
MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
PO BOX 30038
LANSING MI 48909-7538

The public reporting burden for this collection of information is estimated to average 31 minutes for generators, 16 minutes for transporters, and 16 minutes for treatments, storage and disposal facilities. The record-keeping burden per response for this collection of information is estimated to average 8 minutes for generators, 6 minutes for transporters, and 6 minutes for treatment, storage and disposal facilities. The burden associated with reading the regulations is estimated at 1 hour and 15 minutes annually. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency.

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB numbers for EPA's regulations are listed in 40 CFR Part 9 and 48 CFR Chapter 15. Send comments regarding these burden statements or any other aspect of this collection, including suggestions for reducing the burden, including through use of automated collection techniques to the Director, OPPE Regulatory Information Division, U.S. Environmental Protection Agency (2.37), 401 M St., S.W., Washington, D.C., 20460 and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Attention: Desk Officer for EPA, 725 17th Street, N.W., Washington, D.C. 20503. Include the OMB control number in any correspondence.

CERTIFICATE OF DISPOSAL

This certificate is to verify the wastes specified on Manifest #M197573609

have been properly disposed of in accordance with all local, state and federal regulations.

"Disposed of" means either: 1) Burial or 2) Processed as specified in 40 CFR et seq.

FACILITY NAME: *(Please check one)*

☑ Michigan Disposal Waste Treatment Plant (EPA I.D. # MID000724831)

☐ Wayne Disposal, Inc. (EPA I.D. # MID048090633)

ADDRESS: 49350 N. I-94 Service Drive
Belleville, Michigan 48111

PHONE NUMBER: 1-800-592-5489

FAX NUMBER: 1-800-592-5329

Authorized Signature: _____

THE ENVIRONMENTAL QUALITY COMPANY 49350 N. I-94 SERVICE DRIVE BELLEVILLE MICHIGAN 48111

FORM1020 (3/96)

MI0012827

WASTE MANAGEMENT DIVISION
MICHIGAN DEPARTMENT OF
ENVIRONMENTAL QUALITY

DO NOT WRITE IN THIS SPACE
ATT. ☐ DIS. ☐ REJ. ☐ PR. ☐

Required under authority of Part 111 and Part 121 of Act 451, 1994, as amended.

Failure to file may subject you to criminal and/or civil penalties under Sections 324.11151 or 324.12116 MCL.

Please print or type.

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. MID006354380

Manifest Document No.

2. Page 1 of 1

Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
PROFESSIONAL BASKET & MFG
2349 PRINCESS
INKSTER, MI 48141

4. Generator's Phone (517 610 1136) DOUG ROMMECK

A. State Manifest Document Number MI 9757368

B. State Generator's ID

5. Transporter 1 Company Name

6. US EPA ID Number MIR000035701

C. State Transporter's ID

D. Transporter's Phone 734 256 6200

7. Transporter 2 Company Name

8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address
MICHIGAN DISPOSAL WASTE TREATMENT PLANT
49350 NORTH I94 SERVICE DRIVE
BELLEVILLE, MICHIGAN 48111

10. US EPA ID Number MID000724831

G. State Facility's ID

H. Facility's Phone 800-592-5489

	11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID NUMBER).	HM	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	NON RCRA/NON DOT REGULATED SOLIDS	☐	001	DT	75,000	P	SLUD
b.		☐					
c.		☐					
d.		☐					

J. Additional Descriptions for Materials Listed Above
APPROVAL# 11A 101904TBB (CONTAMINATED SOIL)

K. Handling Codes
a
b
c
d

15. Special Handling Instructions and Additional Information

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR; if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: Douglas Rommeck
Signature:
Date: Month 10 Day 24 Year 04

17. Transporter 1 Acknowledgment of Receipt of Materials
Printed/Typed Name: ANDREW FEEMAN
Signature: Andrew Feeman
Date: Month 10 Day 24 Year 04

18 Transporter 2 Acknowledgment of Receipt of Materials
Printed/Typed Name
Signature
Date: Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name
Signature
Date: Month Day Year

GENERATOR
TRANSPORTER
FACILITY

ALL SPILLS MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHIGAN AT 1-800-292-4706 OR OUT OF STATE AT 517-373-7660 AND THE NATIONAL RESPONSE CENTER AT 1-800-424-8802 24 HOUR PER DAY.

MI0012828

GENERAL INSTRUCTIONS

Read all instructions before completing this form. This form has been designed for use on a 12-pitch (elite) typewriter/computer printer; a firm point pen may also be used - press down hard. Ensure all copies are legible.

Federal and state regulations require generators and transporters of hazardous waste and owners or operators of hazardous waste treatment, storage, and disposal facilities to use this form (8700-22) and, if necessary, the continuation sheet (Form 8700-22A) for both inter- and intrastate transportation of hazardous waste as defined in 40 CFR and Part 111 of Act 451 of 1994, as amended (Part 111). State regulations also require the use of this manifest for all regulated shipments of liquid industrial waste as required in Part 121 of Act 451 of 1994, as amended (Part 121).

Federal and State regulations provide for additional requirements, not included in these instructions, regarding the use and management of this form (40 CFR, 49 CFR, Part 111, Part 121).

Additional information such as "Rejected Load Procedures", state assigned identification numbers, manifest forms, etc., can be obtained by contacting the Michigan Department of Environmental Quality (MDEQ), Waste Management Divisions (WMD) Internet Home Page at http://www.deq.state.mi.us/wmd or you may contact the Manifest Unit directly at (517) 373-1217. Continuation sheets are not supplied by MDEQ.

Complete all items on the manifest. Enter "N/A" if any item does not apply. Leave items that may be needed later blank, such as a second transporter.

Item 1. Enter the generator's U.S. EPA twelve digit identification number. For Part 121 manifested shipments where a generator does not have a U.S. EPA assigned number, a state assigned number must be obtained and used. The generator of the waste must enter a unique five digit manifest document number (e.g. 00001).

Item 2. Page number 1 of 1 should be recorded unless a continuation sheet is used, in which case the total number of pages, counting the initial manifest page, should be shown.

Item 3. Enter the name of the generator and the mailing address to which the manifest should be mailed. If the address of the site at which the waste was placed into transportation is different from the mailing address record the site address in item J.

Item 4. Enter a telephone number (including area code) where an authorized agent of the generator can be reached in the event of an emergency and/or a partial or total rejected load.

NOTE: The 24 hour emergency phone number required for a hazardous materials shipping paper may be different from the generator's phone number.

Item 5. Enter the company name of the first transporter who will transport the waste.

Item 6. Enter the transporter's U.S. EPA twelve digit identification number. For Part 121 manifested shipments where a transporter does not have a U.S. EPA assigned number, a state assigned number is to be used.

Item 7. If using a second transporter, enter the company name.

Item 8. Enter the second transporter's U.S. EPA twelve digit identification number. For Part 121 manifested shipments where a transporter does not have a U.S. EPA assigned number, a state number is to be used.

NOTE: If more than two transporters are used, the generator or third transporter shall initiate a continuation sheet. In Item L of the continuation sheet, the generator/transporter must copy the State manifest document number listed in Item A. Every transport company used between the generator and the designated facility (except for intermediate rail or barge transporters used between the initial rail or barge carriers and the designated facility) must be listed. This is not intended to require multiple signatures for individual drivers working for one transporter. Item 2 is to be changed to reflect the added page(s). Continuation sheets must be appropriately completed in their entirety and properly distributed. Continuation sheets may not be used to list additional waste streams.

Item 9. Enter the company name and site address of the facility designated to receive the waste listed on this manifest.

Item 10. Enter the U.S. EPA twelve digit identification number for the designated facility described in Item 9. For Part 121 manifested shipments where a designated facility does not have a U.S. EPA assigned number, a state assigned number is to be used.

Item 11. Enter an X in the HM box if the waste is a hazardous material regulate by U.S. DOT (See 49 CFR 172). Enter the required U.S. DOT shipping description, including Proper Shipping Name, Hazard Class or Division, ID Number (UN/NA), and packing group for each waste as identified in 49 CFR 172. Additional information may also be required in this space, including technical name and reportable quantity references. For only Part 121 regulated wastes include an appropriate shipping description for the waste stream.

Item 12. Enter the number of containers for each waste and the appropriate abbreviations listed below for the type of container. Each container type requires separate entry.

DM = Metal drums, barrels, kegs	CY = Cylinders
DW = Wooden drums, barrels, kegs	CM = Metal boxes, cartons, cases (including roll-offs)
DF = Fiberboard or plastic drums, barrels, kegs	CW = Wooden boxes, cartons, cases
DT = Dump truck	CF = Fiber or plastic boxes, cartons, cases
TP = Tanks, portable	BA = Burlap, cloth, paper / plastic bags
TT = Cargo tanks (tank trucks)	
TC = Tank cars	

Item 13. Enter the total quantity of waste described on each line. Do not use decimals or fractions.

Item 14. Enter the appropriate abbreviation for the unit of measure listed below.

G = Gallons (liquids only)	L = Liters (liquids only)
P = Pounds	K = Kilograms
T = Tons (2000 lbs.)	M = Metric tons (1000 kg)
Y = Cubic yards	N = Cubic meters

Item 15. The generator may use this space to indicate special transportation, treatment, storage or disposal information. Import/Export information as noted in the "International Shipment" instructions section is to be recorded here.

Item 16. The generator must read, print his/her name, sign and date the certification statement.

Item 17. Print the name of the person accepting the waste on behalf of the first transporter. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

Item 18. If applicable, print the name of the person accepting the waste on behalf of the second transporter. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

Item 19. An authorized representative of the designated (or alternate) facility must note in this space any discrepancy in the waste shipment.

Item 20. Print the name of the person accepting the waste on behalf of the designated facility. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

NOTE: MDEQ "Rejected Load Procedures" provides guidance for partial or total load rejections.

Only the following information in the shaded area is a State of Michigan requirement:

Item A. A preprinted State manifest document number.

Item B - H. May be required by other states.

Item I. For hazardous wastes, enter the appropriate waste numbers found in R299.9212 through R299.9214 of Part 111 and 40 CFR 261 Subparts C and D. If more than one waste number is required to appropriately identify the waste, enter the additional numbers in item J. In selecting the most appropriate waste number the following hierarchy must be used: acute waste (including P and acute F), U (toxic), K (specific sources), non-acute F (non-specific sources) and D (characteristic). State regulated wastes follow the same hierarchy as federally regulated wastes. For Part 121 wastes which are not hazardous wastes enter the appropriate code listed below.

Mixed Solvents	007L	Storm Sewer Cleanouts	031L
Pharmaceutical	014L	Sanitary Sewer Cleanouts	032L
Crankcase Oil	017L	X-Ray/Photo Solutions	033L
Coolants and Water Soluble Oils	019L	Water Based Cleaning Solutions	034L
Other Oil (Describe in Item 11 or Item J)	021L	Car Wash Sludges	035L
Brine	022L	Grease Trap Wastes	036L
PCB	026L		
Other Wastes (Describe in Item 11 or Item J)	029L		
Antifreeze	030L		

Item J. Generators are to use this space for the site address if different from the mailing address noted in Item 3, additional waste codes, additional description for a Part 121 waste as noted in Item I of these instructions, approval of commingling authority as required in R299.9304(6).

Item K. List any specific codes which apply.

Burned for Energy Recovery	B
Conditionally Exempt Small Quantity Generator	C
Emergency Response Cleanup	E
Household Generated	H
Recycled Precious Metals	P
Recycled, Reclaimed, Used or Reused	R
Universal Waste	U

INTERNATIONAL SHIPMENTS

Exports- Transporters must sign and enter the date the waste leaves the United States in Item 15. The primary exporter must identify the point of departure from the United States.*

Imports- Shipments of hazardous and Part 121 regulated wastes must be accompanied by a U.S. EPA Uniform Hazardous Waste Manifest. Any person functioning as the U.S. Importer, as defined in Part 111, must complete the manifest as required in R299.9310*.

*Transporters of hazardous waste shipments must deliver a copy of the manifest to U.S. Customs when importing or exporting the waste across U.S. borders. Record the foreign waste manifest document number in Item J.

MANIFEST DISTRIBUTION

GENERATOR: Upon placing the waste into transportation (first transporter signs and dates manifest) remove the white and gold banded copies and give the remainder of the manifest copies to the transporter. Sent the white copy to MDEQ no later than the tenth day of the month following the shipment. For shipments of wastes being transported to a designated facility outside of Michigan when an out-of-state manifest is used, mail to the MDEQ a photocopy of the manifest when the shipment is placed into transportation and mail a photocopy of the second generator manifest copy, when received.

TRANSPORTER: Upon delivery to the designated (or alternate) facility, and that facility signs and dates the manifest, the canary banded copy will be returned to you. If more than one transporter is used, the manifest is to be copied and supplied to the previous transporter acknowledging the receipt of the shipment by the next transporter. The canary banded copy stays with the manifest until the shipment reaches the designated facility.

DESIGNATED FACILITY: Upon signing and dating the manifest as received, give the canary banded

ADDRESS ALL MDEQ MANIFEST COPIES TO:
WASTE MANAGEMENT DIVISION
MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
PO BOX 30038
LANSING MI 48909-7538

The public reporting burden for this collection of information is estimated to average 31 minutes for generators, 16 minutes for transporters, and 18 minutes for treatments, storage and disposal facilities. The record-keeping burden per response for this collection of information is estimated to average 6 minutes for generators, 6 minutes for transporters, and 6 minutes for treatment, storage and disposal facilities. The burden associated with reading the regulations is estimated at 1 hour and 15 minutes annually. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency.

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB numbers for EPA's regulations are listed in 40 CFR Part 9 and 48 CFR Chapter 15. Send comments regarding these burden statements or any other aspect of this collection, including suggestions for reducing the burden, including through use of automated collection techniques to the Director, OPPE Regulatory Information Division, U.S. Environmental Protection Agency (2-37), 401 M St., S.W., Washington, D.C., 20460 and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Attention: Desk Officer for EPA, 725 17th Street, N.W., Washington, D.C. 20503. Include the OMB control number in any correspondence.

WASTE MANAGEMENT DIVISION
MICHIGAN DEPARTMENT OF
ENVIRONMENTAL QUALITY

DO NOT WRITE IN THIS SPACE
ATT. ☐ DIS. ☐ REJ. ☐ PR. ☐

Required under authority of Part 111 and Part 121 of Act 451, 1994, as amended.

Failure to file may subject you to criminal and/or civil penalties under Sections 324.11151 or 324.12116 MCL.

Please print or type.

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. MID005354380

Manifest Document No.

2. Page 1 of 1

Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
WOLVERINE GASKET & MFG
2630 PRINCESS
INKSTER, MI 48141

4. Generator's Phone (517) 610-1138 DOUG ROMMECK

A. State Manifest Document Number MI 9757368

B. State Generator's ID

5. Transporter 1 Company Name GGC

6. US EPA ID Number MIR000039701

C. State Transporter's ID 734-556-6500

D. Transporter's Phone

7. Transporter 2 Company Name

8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address
MICHIGAN DISPOSAL WASTE TREATMENT PLANT
49360 NORTH I94 SERVICE DRIVE
BELLEVILLE, MICHIGAN 49111

10. US EPA ID Number MID000724831

G. State Facility's ID

H. Facility's Phone 800-592-5489

	HM	11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID NUMBER).	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	☐	NON RCRA/NON DOT REGULATED SOLIDS	001	DT	75,000	P	SLUD
b.	☐						
c.	☐						
d.	☐						

J. Additional Descriptions for Materials Listed Above
APPROVAL # 11A 101904TDB (CONTAMINATED SOIL)

K. Handling Codes
a
b
c
d

15. Special Handling Instructions and Additional Information

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR; if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: Douglas Rommeck
Signature: [signature]
Date: Month 10 Day 04 Year 04

17. Transporter 1 Acknowledgment of Receipt of Materials
Printed/Typed Name: ANDREW FEEMAN
Signature: Andrew Feeman
Date: Month 10 Day 24 Year 04

18 Transporter 2 Acknowledgment of Receipt of Materials
Printed/Typed Name
Signature
Date: Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name
Signature
Date: Month Day Year

GENERATOR

TRANSPORTER

FACILITY

ALL SPILLS MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHIGAN AT 1-800-292-4706 OR OUT OF STATE AT 517-373-7660 AND THE NATIONAL RESPONSE CENTER AT 1-800-424-8802 24 HOUR PER DAY.

EPA Form 8700-22 (Rev. 9/88)

GENERATOR 1st COPY

EQP 5110 Rev. 7/03

MI0012830

GENERAL INSTRUCTIONS

Read all instructions before completing this form. This form has been designed for use on a 12-pitch (elite) typewriter/computer printer: a firm point pen may also be used - press down hard. Ensure all copies are legible.

Federal and state regulations require generators and transporters of hazardous waste and owners or operators of hazardous waste treatment, storage, and disposal facilities to use this form (8700-22) and, if necessary, the continuation sheet (Form 8700-22A) for both inter- and intrastate transportation of hazardous waste as defined in 40 CFR and Part 111 of Act 451 of 1994, as amended (Part 111). State regulations also require the use of this manifest for all regulated shipments of liquid industrial waste as required in Part 121 of Act 451 of 1994, as amended (Part 121).

Federal and State regulations provide for additional requirements, not included in these instructions, regarding the use and management of this form (40 CFR, 49 CFR, Part 111, Part 121).

Additional information such as "Rejected Load Procedures", state assigned identification numbers, manifest forms, etc., can be obtained by contacting the Michigan Department of Environmental Quality (MDEQ), Waste Management Divisions (WMD) Internet Home Page at http://www.deq.state.mi.us/wmd or you may contact the Manifest Unit directly at (517) 373-1217. Continuation sheets are not supplied by MDEQ.

Complete all items on the manifest. Enter "N/A" if any item does not apply. Leave items that may be needed later blank, such as a second transporter.

Item 1. Enter the generator's U.S. EPA twelve digit identification number. For Part 121 manifested shipments where a generator does not have a U.S. EPA assigned number, a state assigned number must be obtained and used. The generator of the waste must enter a unique five digit manifest document number (e.g. 00001).

Item 2. Page number 1 of 1 should be recorded unless a continuation sheet is used, in which case the total number of pages, counting the initial manifest page, should be shown.

Item 3. Enter the name of the generator and the mailing address to which the manifest should be mailed. If the address of the site at which the waste was placed into transportation is different from the mailing address record the site address in item J.

Item 4. Enter a telephone number (including area code) where an authorized agent of the generator can be reached in the event of an emergency and/or a partial or total rejected load.

NOTE: The 24 hour emergency phone number required for a hazardous materials shipping paper may be different from the generator's phone number.

Item 5. Enter the company name of the first transporter who will transport the waste.

Item 6. Enter the transporter's U.S. EPA twelve digit identification number. For Part 121 manifested shipments where a transporter does not have a U.S. EPA assigned number, a state assigned number is to be used.

Item 7. If using a second transporter, enter the company name.

Item 8. Enter the second transporter's U.S. EPA twelve digit identification number. For Part 121 manifested shipments where a transporter does not have a U.S. EPA assigned number, a state number is to be used.

NOTE: If more than two transporters are used, the generator or third transporter shall initiate a continuation sheet. In item L of the continuation sheet, the generator/transporter must copy the State manifest document number listed in Item A. Every transport company used between the generator and the designated facility (except for intermediate rail or barge transporters used between the initial rail or barge carriers and the designated facility) must be listed. This is not intended to require multiple signatures for individual drivers working for one transporter. Item 2 is to be changed to reflect the added page(s). Continuation sheets must be appropriately completed in their entirety and properly distributed. Continuation sheets may not be used to list additional waste streams.

Item 9. Enter the company name and site address of the facility designated to receive the waste listed on this manifest.

Item 10. Enter the U.S. EPA twelve digit identification number for the designated facility described in Item 9. For Part 121 manifested shipments where a designated facility does not have a U.S. EPA assigned number, a state assigned number is to be used.

Item 11. Enter an X in the HM box if the waste is a hazardous material regulate by U.S. DOT (See 49 CFR 172). Enter the required U.S. DOT shipping description, including Proper Shipping Name, Hazard Class or Division, ID Number (UN/NA), and packing group for each waste as identified in 49 CFR 172. Additional information may also be required in this space, including technical name and reportable quantity references. For only Part 121 regulated wastes include an appropriate shipping description for the waste stream.

Item 12. Enter the number of containers for each waste and the appropriate abbreviations listed below for the type of container. Each container type requires separate entry.

DM = Metal drums, barrels, kegs	CY = Cylinders
DW = Wooden drums, barrels, kegs	CM = Metal boxes, cartons, cases (including roll-offs)
DF = Fiberboard or plastic drums, barrels, kegs	CW = Wooden boxes, cartons, cases
DT = Dump truck	CF = Fiber or plastic boxes, cartons, cases
TP = Tanks, portable	BA = Burlap, cloth, paper / plastic bags
TT = Cargo tanks (tank trucks)	
TC = Tank cars	

Item 13. Enter the total quantity of waste described on each line. Do not use decimals or fractions.

Item 14. Enter the appropriate abbreviation for the unit of measure listed below.

G = Gallons (liquids only)	L = Liters (liquids only)
P = Pounds	K = Kilograms
T = Tons (2000 lbs.)	M = Metric tons (1000 kg)
Y = Cubic yards	N = Cubic meters

Item 15. The generator may use this space to indicate special transportation, treatment, storage or disposal information. Import/Export information as noted in the "International Shipment" instructions section is to be recorded here.

Item 16. The generator must read, print his/her name, sign and date the certification statement.

Item 17. Print the name of the person accepting the waste on behalf of the first transporter. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

Item 18. If applicable, print the name of the person accepting the waste on behalf of the second transporter. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

Item 19. An authorized representative of the designated (or alternate) facility must note in this space any discrepancy in the waste shipment.

Item 20. Print the name of the person accepting the waste on behalf of the designated facility. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

NOTE: MDEQ "Rejected Load Procedures" provides guidance for partial or total load rejections.

Only the following information in the shaded area is a State of Michigan requirement:

Item A. A preprinted State manifest document number.

Item B - H. May be required by other states.

Item I. For hazardous wastes, enter the appropriate waste numbers found in R299.9212 through R299.9214 of Part 111 and 40 CFR 261 Subparts C and D. If more than one waste number is required to appropriately identify the waste, enter the additional numbers in item J. In selecting the most appropriate waste number the following hierarchy must be used: acute waste (including P and acute F), U (toxic), K (specific sources), non-acute F (non-specific sources) and D (characteristic). State regulated wastes follow the same hierarchy as federally regulated wastes. For Part 121 wastes which are not hazardous wastes enter the appropriate code listed below.

Mixed Solvents	007L	Storm Sewer Cleanouts	031L
Pharmaceutical	014L	Sanitary Sewer Cleanouts	032L
Crankcase Oil	017L	X-Ray/Photo Solutions	033L
Coolants and Water Soluble Oils	019L	Water Based Cleaning Solutions	034L
Other Oil (Describe in Item 11 or Item J)	021L	Car Wash Sludges	035L
Brine	022L	Grease Trap Wastes	036L
PCB	026L		
Other Wastes (Describe in Item 11 or Item J)	029L		
Antifreeze	030L		

Item J. Generators are to use this space for the site address if different from the mailing address noted in Item 3, additional waste codes, additional description for a Part 121 waste as noted in Item I of these instructions, approval of commingling authority as required in R299.9304(6).

Item K. List any specific codes which apply.

Burned for Energy Recovery	B
Conditionally Exempt Small Quantity Generator	O
Emergency Response Cleanup	E
Household Generated	H
Recycled Precious Metals	P
Recycled, Reclaimed, Used or Reused	R
Universal Waste	U

INTERNATIONAL SHIPMENTS

Exports- Transporters must sign and enter the date the waste leaves the United States in Item 15. The primary exporter must identify the point of departure from the United States.*

Imports- Shipments of hazardous and Part 121 regulated wastes must be accompanied by a U.S. EPA Uniform Hazardous Waste Manifest. Any person functioning as the U.S. Importer, as defined in Part 111, must complete the manifest as required in R299.9310*

*Transporters of hazardous waste shipments must deliver a copy of the manifest to U.S. Customs when importing or exporting the waste across U.S. borders. Record the foreign waste manifest document number in Item J.

MANIFEST DISTRIBUTION

GENERATOR: Upon placing the waste into transportation (first transporter signs and dates manifest) remove the white and gold banded copies and give the remainder of the manifest copies to the transporter. Sent the white copy to MDEQ no later than the tenth day of the month following the shipment. For shipments of wastes being transported to a designated facility outside of Michigan when an out-of-state manifest is used, mail to the MDEQ a photocopy of the manifest when the shipment is placed into transportation and mail a photocopy of the second generator manifest copy, when received.

TRANSPORTER: Upon delivery to the designated (or alternate) facility, and that facility signs and dates the manifest, the canary banded copy will be returned to you. If more than one transporter is used, the manifest is to be copied and supplied to the previous transporter acknowledging the receipt of the shipment by the next transporter. The canary banded copy stays with the manifest until the shipment reaches the designated facility.

DESIGNATED FACILITY: Upon signing and dating the manifest as received, give the canary banded

ADDRESS ALL MDEQ MANIFEST COPIES TO:
WASTE MANAGEMENT DIVISION
MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
PO BOX 30038
LANSING MI 48909-7538

The public reporting burden for this collection of information is estimated to average 31 minutes for generators, 18 minutes for transporters, and 16 minutes for treatments, storage and disposal facilities. The record-keeping burden per response for this collection of information is estimated to average 6 minutes for generators, 6 minutes for transporters, and 6 minutes for treatment, storage and disposal facilities. The burden associated with reading the regulations is estimated at 1 hour and 15 minutes annually. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency.

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB numbers for EPA's regulations are listed in 40 CFR Part 9 and 48 CFR Chapter 15. Send comments regarding these burden statements or any other aspect of this collection, including suggestions for reducing the burden, including through use of automated collection techniques to the Director, OPPE Regulatory Information Division, U.S. Environmental Protection Agency (2 37), 401 M St., S.W., Washington, D.C., 20460 and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Attention: Desk Officer for EPA, 725 17th Street, N.W., Washington, D.C. 20503. Include the OMB control number in any correspondence.

CERTIFICATE OF DISPOSAL

This certificate is to verify the wastes specified on Manifest # M19757368

have been properly disposed of in accordance with all local, state and federal regulations.

"Disposed of" means either: 1) Burial or 2) Processed as specified in 40 CFR et seq.

FACILITY NAME: *(Please check one)*

☒ Michigan Disposal Waste Treatment Plant (EPA I.D. # MID000724831)

☐ Wayne Disposal, Inc. (EPA I.D. # MID048090633)

ADDRESS: 49350 N. I-94 Service Drive
Belleville, Michigan 48111

PHONE NUMBER: 1-800-592-5489

FAX NUMBER: 1-800-592-5329

Authorized Signature: _____

THE ENVIRONMENTAL QUALITY COMPANY 49350 N. I-94 SERVICE DRIVE BELLEVILLE MICHIGAN 48111

FORM1020 (3/96)

MI0012832

WASTE MANAGEMENT DIVISION
MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY

DO NOT WRITE IN THIS SPACE
ATT. ☐ DIS. ☐ REJ. ☐ PR. ☐

Required under authority of Part 111 and Part 121 of Act 451, 1994, as amended.
Failure to file may subject you to criminal and/or civil penalties under Sections 324.11151 or 324.12116 MCL.

Please print or type.

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. MID005354386
Manifest Document No.
2. Page 1 of 1
Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
WOLVERINE GASKET & MFG
2830 PRINCESS
INKSTER, MI 48141

A. State Manifest Document Number MI 9757367
B. State Generator's ID

4. Generator's Phone (517) 610-1138 DOUG ROMMECK

5. Transporter 1 Company Name S&C
6. US EPA ID Number MIR000039701
C. State Transporter's ID
D. Transporter's Phone 734-206-6009

7. Transporter 2 Company Name
8. US EPA ID Number
E. State Transporter's ID
F. Transporter's Phone

9. Designated Facility Name and Site Address
MICHIGAN DISPOSALWASTE TREATMENT PLANT
49350 NORTH I94 SERVICE DRIVE
BELLEVILLE, MICHIGAN 48111
10. US EPA ID Number MID000724831
G. State Facility's ID
H. Facility's Phone 800-592-5489

	11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID NUMBER).	HM	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	NON RCRA/NON DOT REGULATED SOLIDS	☐	001	DT	108,000	P	SLUD
b.		☐					
c.		☐					
d.		☐					

J. Additional Descriptions for Materials Listed Above
APPROVAL# 11A 101904TBR (CONTAMINATED SOIL)

K. Handling Codes
a
b
c
d

15. Special Handling Instructions and Additional Information

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR; if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: Douglas Rommeck
Signature: [signature]
Date: Month 10 Day 26 Year 04

TRANSPORTER

17. Transporter 1 Acknowledgment of Receipt of Materials
Printed/Typed Name
Signature
Date: Month Day Year

18 Transporter 2 Acknowledgment of Receipt of Materials
Printed/Typed Name
Signature
Date: Month Day Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name
Signature
Date: Month Day Year

GENERATOR

ALL SPILLS MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHIGAN AT 1-800-292-4706 OR OUT OF STATE AT 517-373-7660 AND THE NATIONAL RESPONSE CENTER AT 1-800-424-8802 24 HOUR PER DAY.

EPA Form 8700-22 (Rev. 9/88) GENERATOR 2nd COPY EQP 5110 Rev. 7/03

MI0012833

GENERAL INSTRUCTIONS

Read all instructions before completing this form. This form has been designed for use on a 12-pitch (elite) typewriter/computer printer; a firm point pen may also be used - press down hard. Ensure all copies are legible.

Federal and state regulations require generators and transporters of hazardous waste and owners or operators of hazardous waste treatment, storage, and disposal facilities to use this form (8700-22) and, if necessary, the continuation sheet (Form 8700-22A) for both inter- and intrastate transportation of hazardous waste as defined in 40 CFR and Part 111 of Act 451 of 1994, as amended (Part 111). State regulations also require the use of this manifest for all regulated shipments of liquid industrial waste as required in Part 121 of Act 451 of 1994, as amended (Part 121).

Federal and State regulations provide for additional requirements, not included in these instructions, regarding the use and management of this form (40 CFR, 49 CFR, Part 111, Part 121).

Additional information such as "Rejected Load Procedures", state assigned identification numbers, manifest forms, etc., can be obtained by contacting the Michigan Department of Environmental Quality (MDEQ), Waste Management Divisions (WMD) Internet-Home Page at http://www.deq.state.mi.us/wmd or you may contact the Manifest Unit directly at (517) 373-1217. Continuation sheets are not supplied by MDEQ.

Complete all items on the manifest. Enter "N/A" if any item does not apply. Leave items that may be needed later blank, such as a second transporter.

Item 1. Enter the generator's U.S. EPA twelve digit identification number. For Part 121 manifested shipments where a generator does not have a U.S. EPA assigned number, a state assigned number must be obtained and used. The generator of the waste must enter a unique five digit manifest document number (e.g. 00001).

Item 2. Page number 1 of 1 should be recorded unless a continuation sheet is used, in which case the total number of pages, counting the initial manifest page, should be shown.

Item 3. Enter the name of the generator and the mailing address to which the manifest should be mailed. If the address of the site at which the waste was placed into transportation is different from the mailing address record the site address in item J.

Item 4. Enter a telephone number (including area code) where an authorized agent of the generator can be reached in the event of an emergency and/or a partial or total rejected load.

NOTE: The 24 hour emergency phone number required for a hazardous materials shipping paper may be different from the generator's phone number.

Item 5. Enter the company name of the first transporter who will transport the waste.

Item 6. Enter the transporter's U.S. EPA twelve digit identification number. For Part 121 manifested shipments where a transporter does not have a U.S. EPA assigned number, a state assigned number is to be used.

Item 7. If using a second transporter, enter the company name.

Item 8. Enter the second transporter's U.S. EPA twelve digit identification number. For Part 121 manifested shipments where a transporter does not have a U.S. EPA assigned number, a state number is to be used.

NOTE: If more than two transporters are used, the generator or third transporter shall initiate a continuation sheet. In Item L of the continuation sheet, the generator/transporter must copy the State manifest document number listed in item A. Every transport company used between the generator and the designated facility (except for intermediate rail or barge transporters used between the initial rail or barge carriers and the designated facility) must be listed. This is not intended to require multiple signatures for individual drivers working for one transporter. Item 2 is to be changed to reflect the added page(s). Continuation sheets must be appropriately completed in their entirety and properly distributed. Continuation sheets may not be used to list additional waste streams.

Item 9. Enter the company name and site address of the facility designated to receive the waste listed on this manifest.

Item 10. Enter the U.S. EPA twelve digit identification number for the designated facility described in Item 9. For Part 121 manifested shipments where a designated facility does not have a U.S. EPA assigned number, a state assigned number is to be used.

Item 11. Enter an X in the HM box if the waste is a hazardous material regulate by U.S. DOT (See 49 CFR 172). Enter the required U.S. DOT shipping description, including Proper Shipping Name, Hazard Class or Division, ID Number (UN/NA), and packing group for each waste as identified in 49 CFR 172. Additional information may also be required in this space, including technical name and reportable quantity references. For only Part 121 regulated wastes include an appropriate shipping description for the waste stream.

Item 12. Enter the number of containers for each waste and the appropriate abbreviations listed below for the type of container. Each container type requires separate entry.

DM = Metal drums, barrels, kegs	CY = Cylinders
DW = Wooden drums, barrels, kegs	CM = Metal boxes, cartons, cases (including roll-offs)
DF = Fiberboard or plastic drums, barrels, kegs	CW = Wooden boxes, cartons, cases
DT = Dump truck	CF = Fiber or plastic boxes, cartons, cases
TP = Tanks, portable	BA = Burlap, cloth, paper / plastic bags
TT = Cargo tanks (tank trucks)	
TC = Tank cars	

Item 13. Enter the total quantity of waste described on each line. Do not use decimals or fractions.

Item 14. Enter the appropriate abbreviation for the unit of measure listed below.

G = Gallons (liquids only)	L = Liters (liquids only)
P = Pounds	K = Kilograms
T = Tons (2000 lbs.)	M = Metric tons (1000 kg)
Y = Cubic yards	N = Cubic meters

Item 15. The generator may use this space to indicate special transportation, treatment, storage or disposal information. Import/Export information as noted in the "International Shipment" instructions section is to be recorded here.

Item 16. The generator must read, print his/her name, sign and date the certification statement.

Item 17. Print the name of the person accepting the waste on behalf of the first transporter. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

Item 18. If applicable, print the name of the person accepting the waste on behalf of the second transporter. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

Item 19. An authorized representative of the designated (or alternate) facility must note in this space any discrepancy in the waste shipment.

Item 20. Print the name of the person accepting the waste on behalf of the designated facility. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

NOTE: MDEQ "Rejected Load Procedures" provides guidance for partial or total load rejections.

Only the following information in the shaded area is a State of Michigan requirement:

Item A. A preprinted State manifest document number.

Item B - H. May be required by other states.

Item I. For hazardous wastes, enter the appropriate waste numbers found in R299.9212 through R299.9214 of Part 111 and 40 CFR 261 Subparts C and D. If more than one waste number is required to appropriately identify the waste, enter the additional numbers in item J. In selecting the most appropriate waste number the following hierarchy must be used: acute waste (including P and acute F), U (toxic), K (specific sources), non-acute F (non-specific sources) and D (characteristic). State regulated wastes follow the same hierarchy as federally regulated wastes. For Part 121 wastes which are not hazardous wastes enter the appropriate code listed below.

Mixed Solvents	007L	Storm Sewer Cleanouts	031L
Pharmaceutical	014L	Sanitary Sewer Cleanouts	032L
Crankcase Oil	017L	X-Ray/Photo Solutions	033L
Coolants and Water Soluble Oils	019L	Water Based Cleaning Solutions	034L
Other Oil (Describe in Item 11 or Item J)	021L	Car Wash Sludges	035L
Brine	022L	Grease Trap Wastes	036L
PCB	026L		
Other Wastes (Describe in Item 11 or Item J)	029L		
Antifreeze	030L		

Item J. Generators are to use this space for the site address if different from the mailing address noted in item 3, additional waste codes, additional description for a Part 121 waste as noted in Item I of these instructions, approval of commingling authority as required in R299.9304(6).

Item K. List any specific codes which apply.

Burned for Energy Recovery	B
Conditionally Exempt Small Quantity Generator	C
Emergency Response Cleanup	E
Household Generated	H
Recycled Precious Metals	P
Recycled, Reclaimed, Used or Reused	R
Universal Waste	U

INTERNATIONAL SHIPMENTS

Exports- Transporters must sign and enter the date the waste leaves the United States in Item 16. The primary exporter must identify the point of departure from the United States.*

Imports- Shipments of hazardous and Part 121 regulated wastes must be accompanied by a U.S. EPA Uniform Hazardous Waste Manifest. Any person functioning as the U.S. Importer, as defined in Part 111, must complete the manifest as required in R299.9310*

*Transporters of hazardous waste shipments must deliver a copy of the manifest to U.S. Customs when importing or exporting the waste across U.S. borders. Record the foreign waste manifest document number in item J.

MANIFEST DISTRIBUTION

GENERATOR: Upon placing the waste into transportation (first transporter signs and dates manifest) remove the white and gold banded copies and give the remainder of the manifest copies to the transporter. Sent the white copy to MDEQ no later than the tenth day of the month following the shipment. For shipments of wastes being transported to a designated facility outside of Michigan when, an out-of-state manifest is used, mail to the MDEQ a photocopy of the manifest when the shipment is placed into transportation and mail a photocopy of the second generator manifest copy, when received.

TRANSPORTER: Upon delivery to the designated (or alternate) facility, and that facility signs and dates the manifest, the canary banded copy will be returned to you. If more than one transporter is used, the manifest is to be copied and supplied to the previous transporter acknowledging the receipt of the shipment by the next transporter. The canary banded copy stays with the manifest until the shipment reaches the designated facility.

DESIGNATED FACILITY: Upon signing and dating the manifest as received, give the canary banded

ADDRESS ALL MDEQ MANIFEST COPIES TO:
WASTE MANAGEMENT DIVISION
MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
PO BOX 30038
LANSING MI 48909-7538

The public reporting burden for this collection of information is estimated to average 31 minutes for generators, 16 minutes for transporters, and 18 minutes for treatments, storage and disposal facilities. The record-keeping burden per response for this collection of information is estimated to average 6 minutes for generators, 6 minutes for transporters, and 3 minutes for treatment, storage and disposal facilities. The burden associated with reading the regulations is estimated at 1 hour and 15 minutes annually. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency.

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB numbers for EPA's regulations are listed in 40 CFR Part 9 and 48 CFR Chapter 15. Send comments regarding these burden statements or any other aspect of this collection, including suggestions for reducing the burden, including through use of automated collection techniques to the Director, OPPS Regulatory Information Division, U.S. Environmental Protection Agency (2137), 401 M St., S.W., Washington, D.C., 20460 and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Attention: Desk Officer for EPA, 725 17th Street, N.W., Washington, D.C. 20503. Include the OMB control number in any correspondence.

MI0012834

DEQ WASTE MANAGEMENT DIVISION
MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY

DO NOT WRITE IN THIS SPACE
ATT. ☐ DIS. ☐ REJ. ☐ PR. ☐

Required under authority of Part 111 and Part 121 of Act 451, 1994, as amended.
Failure to file may subject you to criminal and/or civil penalties under Sections 324.11151 or 324.12116 MCL.

Please print or type.

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: MID005394389
Manifest Document No.:
2. Page 1 of 1
Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
WOLVERINE GASKET & MFG.
2330 PRINCESS
INKSTER, MI 48141

4. Generator's Phone ( ) 517 810-1136 DOUG ROMMECK

A. State Manifest Document Number: MI 9757367
B. State Generator's ID:

5. Transporter 1 Company Name: S&C
6. US EPA ID Number: MIR000039701
C. State Transporter's ID:
D. Transporter's Phone: [illegible]

7. Transporter 2 Company Name:
8. US EPA ID Number:
E. State Transporter's ID:
F. Transporter's Phone:

9. Designated Facility Name and Site Address
MICHIGAN DISPOSALWASTE TREATMENT PLANT
49350 NORTH I94 SERVICE DRIVE
BELLEVILLE, MICHIGAN 48111

10. US EPA ID Number: MID000724831
G. State Facility's ID:
H. Facility's Phone: 800-592-5489

	HM	11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID NUMBER).	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	☐	NON RCRA/NON DOT REGULATED SOLIDS	001	DT	108,000	P	SLUD
b.	☐						
c.	☐						
d.	☐						

J. Additional Descriptions for Materials Listed Above
APPROVAL# 11A 101904TBB (CONTAMINATED SOIL)

K. Handling Codes
a
b
c
d

15. Special Handling Instructions and Additional Information

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR; if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: Douglas Rommeck
Signature: [signature]
Date: Month 10 Day 25 Year 04

17. Transporter 1 Acknowledgment of Receipt of Materials
Printed/Typed Name:
Signature:
Date: Month Day Year

18 Transporter 2 Acknowledgment of Receipt of Materials
Printed/Typed Name:
Signature:
Date: Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name:
Signature:
Date: Month Day Year

GENERATOR

TRANSPORTER

FACILITY

ALL SPILLS MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHIGAN AT 1-800-292-4706 OR OUT OF STATE AT 517-373-7660 AND THE NATIONAL RESPONSE CENTER AT 1-800-424-8802 24 HOUR PER DAY.

EPA Form 8700-22 (Rev. 9/88)

GENERATOR 1st COPY

EQP 5110 Rev. 7/03

MI0012835

GENERAL INSTRUCTIONS

Read all instructions before completing this form. This form has been designed for use on a 12-pitch (elite) typewriter/computer printer: a firm point pen may also be used - press down hard. Ensure all copies are legible.

Federal and state regulations require generators and transporters of hazardous waste and owners or operators of hazardous waste treatment, storage, and disposal facilities to use this form (8700-22) and, if necessary, the continuation sheet (Form 8700-22A) for both inter- and intrastate transportation of hazardous waste as defined in 40 CFR and Part 111 of Act 451 of 1994, as amended (Part 111). State regulations also require the use of this manifest for all regulated shipments of liquid industrial waste as required in Part 121 of Act 451 of 1994, as amended (Part 121).

Federal and State regulations provide for additional requirements, not included in these instructions, regarding the use and management of this form (40 CFR, 49 CFR, Part 111, Part 121).

Additional information such as "Rejected Load Procedures", state assigned identification numbers, manifest forms, etc., can be obtained by contacting the Michigan Department of Environmental Quality (MDEQ), Waste Management Divisions (WMD) Internet Home Page at http://www.deq.state.mi.us/wmd or you may contact the Manifest Unit directly at (517) 373-1217. Continuation sheets are not supplied by MDEQ.

Complete all items on the manifest. Enter "N/A" if any item does not apply. Leave items that may be needed later blank, such as a second transporter.

Item 1. Enter the generator's U.S. EPA twelve digit identification number. For Part 121 manifested shipments where a generator does not have a U.S. EPA assigned number, a state assigned number must be obtained and used. The generator of the waste must enter a unique five digit manifest document number (e.g. 00001).

Item 2. Page number 1 of 1 should be recorded unless a continuation sheet is used, in which case the total number of pages, counting the initial manifest page, should be shown.

Item 3. Enter the name of the generator and the mailing address to which the manifest should be mailed. If the address of the site at which the waste was placed into transportation is different from the mailing address record the site address in item J.

Item 4. Enter a telephone number (including area code) where an authorized agent of the generator can be reached in the event of an emergency and/or a partial or total rejected load.

NOTE: The 24 hour emergency phone number required for a hazardous materials shipping paper may be different from the generator's phone number.

Item 5. Enter the company name of the first transporter who will transport the waste.

Item 6. Enter the transporter's U.S. EPA twelve digit identification number. For Part 121 manifested shipments where a transporter does not have a U.S. EPA assigned number, a state assigned number is to be used.

Item 7. If using a second transporter, enter the company name.

Item 8. Enter the second transporter's U.S. EPA twelve digit identification number. For Part 121 manifested shipments where a transporter does not have a U.S. EPA assigned number, a state number is to be used.

NOTE: If more than two transporters are used, the generator or third transporter shall initiate a continuation sheet. In Item L of the continuation sheet, the generator/transporter must copy the State manifest document number listed in Item A. Every transport company used between the generator and the designated facility (except for intermediate rail or barge transporters used between the initial rail or barge carriers and the designated facility) must be listed. This is not intended to require multiple signatures for individual drivers working for one transporter. Item 2 is to be changed to reflect the added page(s). Continuation sheets must be appropriately completed in their entirety and properly distributed. Continuation sheets may not be used to list additional waste streams.

Item 9. Enter the company name and site address of the facility designated to receive the waste listed on this manifest.

Item 10. Enter the U.S. EPA twelve digit identification number for the designated facility described in Item 9. For Part 121 manifested shipments where a designated facility does not have a U.S. EPA assigned number, a state assigned number is to be used.

Item 11. Enter an X in the HM box if the waste is a hazardous material regulate by U.S. DOT (See 49 CFR 172). Enter the required U.S. DOT shipping description, including Proper Shipping Name, Hazard Class or Division, ID Number (UN/NA), and packing group for each waste as identified in 49 CFR 172. Additional information may also be required in this space, including technical name and reportable quantity references. For only Part 121 regulated wastes include an appropriate shipping description for the waste stream.

Item 12. Enter the number of containers for each waste and the appropriate abbreviations listed below for the type of container. Each container type requires separate entry.

DM = Metal drums, barrels, kegs
DW = Wooden drums, barrels, kegs
DF = Fiberboard or plastic drums, barrels, kegs
DT = Dump truck
TP = Tanks, portable
TT = Cargo tanks (tank trucks)
TC = Tank cars
CY = Cylinders
CM = Metal boxes, cartons, cases (including roll-offs)
CW = Wooden boxes, cartons, cases
CF = Fiber or plastic boxes, cartons, cases
BA = Burlap, cloth, paper / plastic bags

Item 13. Enter the total quantity of waste described on each line. Do not use decimals or fractions.

Item 14. Enter the appropriate abbreviation for the unit of measure listed below.

G = Gallons (liquids only)
P = Pounds
T = Tons (2000 lbs.)
Y = Cubic yards
L = Liters (liquids only)
K = Kilograms
M = Metric tons (1000 kg)
N = Cubic meters

Item 15. The generator may use this space to indicate special transportation, treatment, storage or disposal information. Import/Export information as noted in the "International Shipment" instructions section is to be recorded here.

Item 16. The generator must read, print his/her name, sign and date the certification statement.

Item 17. Print the name of the person accepting the waste on behalf of the first transporter. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

Item 18. If applicable, print the name of the person accepting the waste on behalf of the second transporter. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

Item 19. An authorized representative of the designated (or alternate) facility must note in this space any discrepancy in the waste shipment.

Item 20. Print the name of the person accepting the waste on behalf of the designated facility. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

NOTE: MDEQ "Rejected Load Procedures" provides guidance for partial or total load rejections.

Only the following information in the shaded area is a State of Michigan requirement:

Item A. A preprinted State manifest document number.

Item B - H. May be required by other states.

Item I. For hazardous wastes, enter the appropriate waste numbers found in R299.9212 through R299.9214 of Part 111 and 40 CFR 261 Subparts C and D. If more than one waste number is required to appropriately identify the waste, enter the additional numbers in item J. In selecting the most appropriate waste number the following hierarchy must be used: acute waste (including P and acute F), U (toxic), K (specific sources), non-acute F (non-specific sources) and D (characteristic). State regulated wastes follow the same hierarchy as federally regulated wastes. For Part 121 wastes which are not hazardous wastes enter the appropriate code listed below.

Mixed Solvents	007L	Storm Sewer Cleanouts	031L
Pharmaceutical	014L	Sanitary Sewer Cleanouts	032L
Crankcase Oil	017L	X-Ray/Photo Solutions	033L
Coolants and Water Soluble Oils	019L	Water Based Cleaning Solutions	034L
Other Oil (Describe in Item 11 or Item J)	021L	Car Wash Sludges	035L
Brine	022L	Grease Trap Wastes	036L
PCB	026L		
Other Wastes (Describe in Item 11 or Item J)	029L		
Antifreeze	030L		

Item J. Generators are to use this space for the site address if different from the mailing address noted in Item 3, additional waste codes, additional description for a Part 121 waste as noted in Item I of these instructions, approval of commingling authority as required in R299.9304(6).

Item K. List any specific codes which apply.

Burned for Energy Recovery	B
Conditionally Exempt Small Quantity Generator	C
Emergency Response Cleanup	E
Household Generated	H
Recycled Precious Metals	P
Recycled, Reclaimed, Used or Reused	R
Universal Waste	U

INTERNATIONAL SHIPMENTS

Exports- Transporters must sign and enter the date the waste leaves the United States in Item 15. The primary exporter must identify the point of departure from the United States.*

Imports- Shipments of hazardous and Part 121 regulated wastes must be accompanied by a U.S. EPA Uniform Hazardous Waste Manifest. Any person functioning as the U.S. Importer, as defined in Part 111, must complete the manifest as required in R299.9310*

*Transporters of hazardous waste shipments must deliver a copy of the manifest to U.S. Customs when importing or exporting the waste across U.S. borders. Record the foreign waste manifest document number in Item J.

MANIFEST DISTRIBUTION

GENERATOR: Upon placing the waste into transportation (first transporter signs and dates manifest) remove the white and gold banded copies and give the remainder of the manifest copies to the transporter. Sent the white copy to MDEQ no later than the tenth day of the month following the shipment. For shipments of wastes being transported to a designated facility outside of Michigan when an out-of-state manifest is used, mail to the MDEQ a photocopy of the manifest when the shipment is placed into transportation and mail a photocopy of the second generator manifest copy, when received.

TRANSPORTER: Upon delivery to the designated (or alternate) facility, and that facility signs and dates the manifest, the canary banded copy will be returned to you. If more than one transporter is used, the manifest is to be copied and supplied to the previous transporter acknowledging the receipt of the shipment by the next transporter. The canary banded copy stays with the manifest until the shipment reaches the designated facility.

DESIGNATED FACILITY: Upon signing and dating the manifest as received, give the canary banded

ADDRESS ALL MDEQ MANIFEST COPIES TO:
WASTE MANAGEMENT DIVISION
MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
PO BOX 30038
LANSING MI 48909-7538

The public reporting burden for this collection of information is estimated to average 31 minutes for generators, 16 minutes for transporters, and 15 minutes for treatments, storage and disposal facilities. The record-keeping burden per response for this collection of information is estimated to average 6 minutes for generators, 6 minutes for transporters, and 6 minutes for treatment, storage and disposal facilities. The burden associated with reading the regulations is estimated at 1 hour and 15 minutes annually. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency.

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB numbers for EPA's regulations are listed in 40 CFR Part 9 and 48 CFR Chapter 15. Send comments regarding these burden statements or any other aspect of this collection, including suggestions for reducing the burden, including through use of automated collection techniques to the Director, OPPE Regulatory Information Division, U.S. Environmental Protection Agency (2.37), 401 M St., S.W., Washington, D.C., 20460 and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Attention: Desk Officer for EPA, 725 17th Street, N.W., Washington, D.C. 20503. Include the OMB control number in any correspondence.

MI0012836

CERTIFICATE OF DISPOSAL

This certificate is to verify the wastes specified on Manifest # MI9757367

have been properly disposed of in accordance with all local, state and federal regulations.

"Disposed of" means either: 1) Burial or 2) Processed as specified in 40 CFR et seq.

FACILITY NAME: *(Please check one)*

☒ Michigan Disposal Waste Treatment Plant (EPA I.D. # MID000724831)

☐ Wayne Disposal, Inc. (EPA I.D. # MID048090633)

ADDRESS: 49350 N. I-94 Service Drive
Belleville, Michigan 48111

PHONE NUMBER: 1-800-592-5489

FAX NUMBER: 1-800-592-5329

Authorized Signature: _____

THE ENVIRONMENTAL QUALITY COMPANY 49350 N. I-94 SERVICE DRIVE BELLEVILLE MICHIGAN 48111

FORM1020 (3/96)

MI0012837

DEQ WASTE MANAGEMENT DIVISION
MICHIGAN DEPARTMENT OF
ENVIRONMENTAL QUALITY

DO NOT WRITE IN THIS SPACE
ATT. ☐ DIS. ☐ REJ. ☐ PR. ☐

Required under authority of Part 111 and Part 121 of Act 451, 1994, as amended.

Failure to file may subject you to criminal and/or civil penalties under Sections 324.11151 or 324.12116 MCL.

Please print or type.

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. MID005354386

Manifest Document No.

2. Page 1 of 1

Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
WOLVERINE GASKET & MFG.
2638 PRINCESS
INKSTER, MI 48141

4. Generator's Phone (517) 810-1138 DOUG ROMMECK

A. State Manifest Document Number MI 9757366

B. State Generator's ID

5. Transporter 1 Company Name SAC

6. US EPA ID Number MIR000039701

C. State Transporter's ID

D. Transporter's Phone 734 266 6500

7. Transporter 2 Company Name

8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address
MICHIGAN DISPOSAL WASTE TREATMENT PLANT
49350 NORTH 194 SERVICE DRIVE
BELLEVILLE, MICHIGAN 48111

10. US EPA ID Number MID000724831

G. State Facility's ID

H. Facility's Phone 800-592-5489

	HM	11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID NUMBER).	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	☐	NON RCRA/NON DOT REGULATED SOLIDS	001	DT	104000	P	SLUD
b.	☐						
c.	☐						
d.	☐						

J. Additional Descriptions for Materials Listed Above
APPROVAL# 11A 101904TBB (CONTAMINATED SOIL)

K. Handling Codes
a
b
c
d

15. Special Handling Instructions and Additional Information

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR; if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: Doug Rommeck
Signature: [signature]
Date: Month Day Year: 10 8 04

17. Transporter 1 Acknowledgment of Receipt of Materials
Printed/Typed Name
Signature
Date: Month Day Year

18 Transporter 2 Acknowledgment of Receipt of Materials
Printed/Typed Name: Cyril Wolter
Signature
Date: Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name
Signature
Date: Month Day Year

GENERATOR

TRANSPORTER

FACILITY

ALL SPILLS MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHIGAN AT 1-800-292-4706 OR OUT OF STATE AT 517-373-7660 AND THE NATIONAL RESPONSE CENTER AT 1-800-424-8802 24 HOUR PER DAY.

EPA Form 8700-22 (Rev. 9/88) GENERATOR 2nd COPY EQP 5110 Rev. 7/03

MI0012838

GENERAL INSTRUCTIONS

Read all instructions before completing this form. This form has been designed for use on a 12-pitch (elite) typewriter/computer printer: a firm point pen may also be used - press down hard. Ensure all copies are legible.

Federal and state regulations require generators and transporters of hazardous waste and owners or operators of hazardous waste treatment, storage, and disposal facilities to use this form (8700-22) and, if necessary, the continuation sheet (Form 8700-22A) for both inter- and intrastate transportation of hazardous waste as defined in 40 CFR and Part 111 of Act 451 of 1994, as amended (Part 111). State regulations also require the use of this manifest for all regulated shipments of liquid industrial waste as required in Part 121 of Act 451 of 1994, as amended (Part 121).

Federal and State regulations provide for additional requirements, not included in these instructions, regarding the use and management of this form (40 CFR, 49 CFR, Part 111, Part 121).

Additional information such as "Rejected Load Procedures", state assigned identification numbers, manifest forms, etc., can be obtained by contacting the Michigan Department of Environmental Quality (MDEQ), Waste Management Divisions (WMD) -Internet Home Page at http://www.deq.state.mi.us/wmd or you may contact the Manifest Unit directly at (517) 373-1217. Continuation sheets are not supplied by MDEQ.

Complete all items on the manifest. Enter "N/A" if any item does not apply. Leave items that may be needed later blank, such as a second transporter.

Item 1. Enter the generator's U.S. EPA twelve digit identification number. For Part 121 manifested shipments where a generator does not have a U.S. EPA assigned number, a state assigned number must be obtained and used. The generator of the waste must enter a unique five digit manifest document number (e.g. 00001).

Item 2. Page number 1 of 1 should be recorded unless a continuation sheet is used, in which case the total number of pages, counting the initial manifest page, should be shown.

Item 3. Enter the name of the generator and the mailing address to which the manifest should be mailed. If the address of the site at which the waste was placed into transportation is different from the mailing address record the site address in item J.

Item 4. Enter a telephone number (including area code) where an authorized agent of the generator can be reached in the event of an emergency and/or a partial or total rejected load.

NOTE: The 24 hour emergency phone number required for a hazardous materials shipping paper may be different from the generator's phone number.

Item 5. Enter the company name of the first transporter who will transport the waste.

Item 6. Enter the transporter's U.S. EPA twelve digit identification number. For Part 121 manifested shipments where a transporter does not have a U.S. EPA assigned number, a state assigned number is to be used.

Item 7. If using a second transporter, enter the company name.

Item 8. Enter the second transporter's U.S. EPA twelve digit identification number. For Part 121 manifested shipments where a transporter does not have a U.S. EPA assigned number, a state number is to be used.

NOTE: If more than two transporters are used, the generator or third transporter shall initiate a continuation sheet. In Item L of the continuation sheet, the generator/transporter must copy the State manifest document number listed in Item A. Every transport company used between the generator and the designated facility (except for intermediate rail or barge transporters used between the initial rail or barge carriers and the designated facility) must be listed. This is not intended to require multiple signatures for individual drivers working for one transporter. Item 2 is to be changed to reflect the added page(s). Continuation sheets must be appropriately completed in their entirety and properly distributed. Continuation sheets may not be used to list additional waste streams.

Item 9. Enter the company name and site address of the facility designated to receive the waste listed on this manifest.

Item 10. Enter the U.S. EPA twelve digit identification number for the designated facility described in Item 9. For Part 121 manifested shipments where a designated facility does not have a U.S. EPA assigned number, a state assigned number is to be used.

Item 11. Enter an X in the HM box if the waste is a hazardous material regulate by U.S. DOT, (See 49 CFR 172). Enter the required U.S. DOT shipping description, including Proper Shipping Name, Hazard Class or Division, ID Number (UN/NA), and packing group for each waste as identified in 49 CFR 172. Additional information may also be required in this space, including technical name and reportable quantity references. For only Part 121 regulated wastes include an appropriate shipping description for the waste stream.

Item 12. Enter the number of containers for each waste and the appropriate abbreviations listed below for the type of container. Each container type requires separate entry.

DM = Metal drums, barrels, kegs	CY = Cylinders
DW = Wooden drums, barrels, kegs	CM = Metal boxes, cartons, cases (including roll-offs)
DF = Fiberboard or plastic drums, barrels, kegs	CW = Wooden boxes, cartons, cases
DT = Dump truck	CF = Fiber or plastic boxes, cartons, cases
TP = Tanks, portable	BA = Burlap, cloth, paper / plastic bags
TT = Cargo tanks (tank trucks)	
TC = Tank cars	

Item 13. Enter the total quantity of waste described on each line. Do not use decimals or fractions.

Item 14. Enter the appropriate abbreviation for the unit of measure listed below.

G = Gallons (liquids only)	L = Liters (liquids only)
P = Pounds	K = Kilograms
T = Tons (2000 lbs.)	M = Metric tons (1000 kg)
Y = Cubic yards	N = Cubic meters

Item 15. The generator may use this space to indicate special transportation, treatment, storage or disposal information. Import/Export information as noted in the "International Shipment" instructions section is to be recorded here.

Item 16. The generator must read, print his/her name, sign and date the certification statement.

Item 17. Print the name of the person accepting the waste on behalf of the first transporter. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

Item 18. If applicable, print the name of the person accepting the waste on behalf of the second transporter. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

Item 19. An authorized representative of the designated (or alternate) facility must note in this space any discrepancy in the waste shipment.

Item 20. Print the name of the person accepting the waste on behalf of the designated facility. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

NOTE: MDEQ "Rejected Load Procedures" provides guidance for partial or total load rejections.

Only the following information in the shaded area is a State of Michigan requirement:

Item A. A preprinted State manifest document number.

Item B - H. May be required by other states.

Item I. For hazardous wastes, enter the appropriate waste numbers found in R299.9212 through R299.9214 of Part 111 and 40 CFR 261 Subparts C and D. If more than one waste number is required to appropriately identify the waste, enter the additional numbers in item J. In selecting the most appropriate waste number the following hierarchy must be used: acute waste (including P and acute F), U (toxic), K (specific sources), non-acute F (non-specific sources) and D (characteristic). State regulated wastes follow the same hierarchy as federally regulated wastes. For Part 121 wastes which are not hazardous wastes enter the appropriate code listed below.

Mixed Solvents	007L	Storm Sewer Cleanouts	031L
Pharmaceutical	014L	Sanitary Sewer Cleanouts	032L
Crankcase Oil	017L	X-Ray/Photo Solutions	033L
Coolants and Water Soluble Oils	019L	Water Based Cleaning Solutions	034L
Other Oil (Describe in Item 11 or Item J)	021L	Car Wash Sludges	035L
Brine	022L	Grease Trap Wastes	036L
PCB	026L		
Other Wastes (Describe in Item 11 or Item J)	029L		
Antifreeze	030L		

Item J. Generators are to use this space for the site address if different from the mailing address noted in Item 3, additional waste codes, additional description for a Part 121 waste as noted in Item I of these instructions, approval of commingling authority as required in R299.9304(6).

Item K. List any specific codes which apply.

Burned for Energy Recovery	B
Conditionally Exempt Small Quantity Generator	C
Emergency Response Cleanup	E
Household Generated	H
Recycled Precious Metals	P
Recycled, Reclaimed, Used or Reused	R
Universal Waste	U

INTERNATIONAL SHIPMENTS

Exports- Transporters must sign and enter the date the waste leaves the United States in Item 15. The primary exporter must identify the point of departure from the United States.*

Imports- Shipments of hazardous and Part 121 regulated wastes must be accompanied by a U.S. EPA Uniform Hazardous Waste Manifest. Any person functioning as the U.S. Importer, as defined in Part 111, must complete the manifest as required in R299.9310*

*Transporters of hazardous waste shipments must deliver a copy of the manifest to U.S. Customs when importing or exporting the waste across U.S. borders. Record the foreign waste manifest document number in Item J.

MANIFEST DISTRIBUTION

GENERATOR: Upon placing the waste into transportation (first transporter signs and dates manifest) remove the white and gold banded copies and give the remainder of the manifest copies to the transporter. Sent the white copy to MDEQ no later than the tenth day of the month following the shipment. For shipments of wastes being transported to a designated facility outside of Michigan when an out-of-state manifest is used, mail to the MDEQ a photocopy of the manifest when the shipment is placed into transportation and mail a photocopy of the second generator manifest copy, when received.

TRANSPORTER: Upon delivery to the designated (or alternate) facility, and that facility signs and dates the manifest, the canary banded copy will be returned to you. If more than one transporter is used, the manifest is to be copied and supplied to the previous transporter acknowledging the receipt of the shipment by the next transporter. The canary banded copy stays with the manifest until the shipment reaches the designated facility.

DESIGNATED FACILITY: Upon signing and dating the manifest as received, give the canary banded

ADDRESS ALL MDEQ MANIFEST COPIES TO:
WASTE MANAGEMENT DIVISION
MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
PO BOX 30038
LANSING, MI 48909-7538

The public reporting burden for the collection of information is estimated to average 31 minutes for generators, 18 minutes for transporters, and 16 minutes for treatment, storage and disposal facilities. The record-keeping burden per response for this collection of information is estimated to average 6 minutes for generators, 6 minutes for transporters, and 6 minutes for treatment, storage and disposal facilities. The burden associated with reading the regulations is estimated at 1 hour and 15 minutes annually. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency.

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB numbers for EPA's regulations are listed in 40 CFR Part 9 and 48 CFR Chapter 15. Send comments regarding these burden statements or any other aspect of this collection, including suggestions for reducing the burden, including through use of automated collection techniques to the Director, OPPE Regulatory Information Division, U.S. Environmental Protection Agency (2.37), 401 M St., S.W., Washington, D.C., 20460 and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Attention: Desk Officer for EPA, 725 17th Street, N.W., Washington, D.C. 20503, include the OMB control number in any correspondence.

MI0012839

DEQ WASTE MANAGEMENT DIVISION
MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY

DO NOT WRITE IN THIS SPACE
ATT. ☐ DIS. ☐ REJ. ☐ PR. ☐

Required under authority of Part 111 and Part 121 of Act 451, 1994, as amended.

Failure to file may subject you to criminal and/or civil penalties under Sections 324.11151 or 324.12116 MCL.

Please print or type.

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. MID005354306

Manifest Document No.

2. Page 1 of 1

Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
WOLVERINE GASKET & MFG.
2638 PRINCESS
INKSTER, MI 48141

4. Generator's Phone (517) 810-1138 DOUG ROMMECK

A. State Manifest Document Number MI 9757366

B. State Generator's ID

5. Transporter 1 Company Name 96C

6. US EPA ID Number MIR000030701

C. State Transporter's ID

D. Transporter's Phone

7. Transporter 2 Company Name

8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address
MICHIGAN DISPOSAL WASTE TREATMENT PLANT
48350 NORTH 194 SERVICE DRIVE
BELLEVILLE, MICHIGAN 48111

10. US EPA ID Number MID000724831

G. State Facility's ID

H. Facility's Phone 800-592-5489

	HM	11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID NUMBER).	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	☐	NON RCRA/NON DOT REGULATED SOLIDS	001	DT	104000	P	SLUD
b.	☐						
c.	☐						
d.	☐						

J. Additional Descriptions for Materials Listed Above
APPROVAL# 11A 101904TBD (CONTAMINATED SOIL)

K. Handling Codes
a
b
c
d

15. Special Handling Instructions and Additional Information

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR; if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: Doug Rommeck
Signature: [signature]
Date: Month 10 Day 1 Year 04

17. Transporter 1 Acknowledgment of Receipt of Materials
Printed/Typed Name
Signature
Date: Month Day Year

18 Transporter 2 Acknowledgment of Receipt of Materials
Printed/Typed Name: Cliff Wozier
Signature
Date: Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name
Signature
Date: Month Day Year

GENERATOR

TRANSPORTER

FACILITY

ALL SPILLS MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHIGAN AT 1-800-292-4706 OR OUT OF STATE AT 517-373-7660 AND THE NATIONAL RESPONSE CENTER AT 1-800-424-8802 24 HOUR PER DAY.

EPA Form 8700-22 (Rev. 9/88)

GENERATOR 1st COPY

EQP 5110 Rev. 7/03

MI0012840

GENERAL INSTRUCTIONS

Read all instructions before completing this form. This form has been designed for use on a 12-pitch (elite) typewriter/computer printer: a firm point pen may also be used - press down hard. Ensure all copies are legible.

Federal and state regulations require generators and transporters of hazardous waste and owners or operators of hazardous waste treatment, storage, and disposal facilities to use this form (8700-22) and, if necessary, the continuation sheet (Form 8700-22A) for both inter- and intrastate transportation of hazardous waste as defined in 40 CFR and Part 111 of Act 451 of 1994, as amended (Part 111). State regulations also require the use of this manifest for all regulated shipments of liquid industrial waste as required in Part 121 of Act 451 of 1994, as amended (Part 121).

Federal and State regulations provide for additional requirements, not included in these instructions, regarding the use and management of this form (40 CFR, 49 CFR, Part 111, Part 121).

Additional information such as "Rejected Load Procedures", state assigned identification numbers, manifest forms, etc., can be obtained by contacting the Michigan Department of Environmental Quality (MDEQ), Waste Management Divisions (WMD) Internet Home Page at http://www.deq.state.mi.us/wmd or you may contact the Manifest Unit directly at (517) 373-1217. Continuation sheets are not supplied by MDEQ.

Complete all items on the manifest. Enter "N/A" if any item does not apply. Leave items that may be needed later blank, such as a second transporter.

Item 1. Enter the generator's U.S. EPA twelve digit identification number. For Part 121 manifested shipments where a generator does not have a U.S. EPA assigned number, a state assigned number must be obtained and used. The generator of the waste must enter a unique five digit manifest document number (e.g. 00001).

Item 2. Page number 1 of 1 should be recorded unless a continuation sheet is used, in which case the total number of pages, counting the initial manifest page, should be shown.

Item 3. Enter the name of the generator and the mailing address to which the manifest should be mailed. If the address of the site at which the waste was placed into transportation is different from the mailing address record the site address in item J.

Item 4. Enter a telephone number (including area code) where an authorized agent of the generator can be reached in the event of an emergency and/or a partial or total rejected load.

NOTE: The 24 hour emergency phone number required for a hazardous materials shipping paper may be different from the generator's phone number.

Item 5. Enter the company name of the first transporter who will transport the waste.

Item 6. Enter the transporter's U.S. EPA twelve digit identification number. For Part 121 manifested shipments where a transporter does not have a U.S. EPA assigned number, a state assigned number is to be used.

Item 7. If using a second transporter, enter the company name.

Item 8. Enter the second transporter's U.S. EPA twelve digit identification number. For Part 121 manifested shipments where a transporter does not have a U.S. EPA assigned number, a state number is to be used.

NOTE: If more than two transporters are used, the generator or third transporter shall initiate a continuation sheet. In Item L of the continuation sheet, the generator/transporter must copy the State manifest document number listed in Item A. Every transport company used between the generator and the designated facility (except for intermediate rail or barge transporters used between the initial rail or barge carriers and the designated facility) must be listed. This is not intended to require multiple signatures for individual drivers working for one transporter. Item 2 is to be changed to reflect the added page(s). Continuation sheets must be appropriately completed in their entirety and properly distributed. Continuation sheets may not be used to list additional waste streams.

Item 9. Enter the company name and site address of the facility designated to receive the waste listed on this manifest.

Item 10. Enter the U.S. EPA twelve digit identification number for the designated facility described in Item 9. For Part 121 manifested shipments where a designated facility does not have a U.S. EPA assigned number, a state assigned number is to be used.

Item 11. Enter an X in the HM box if the waste is a hazardous material regulate by U.S. DOT (See 49 CFR 172). Enter the required U.S. DOT shipping description, including Proper Shipping Name, Hazard Class or Division, ID Number (UN/NA), and packing group for each waste as identified in 49 CFR 172. Additional information may also be required in this space, including technical name and reportable quantity references. For only Part 121 regulated wastes include an appropriate shipping description for the waste stream.

Item 12. Enter the number of containers for each waste and the appropriate abbreviations listed below for the type of container. Each container type requires separate entry.

DM = Metal drums, barrels, kegs	CY = Cylinders
DW = Wooden drums, barrels, kegs	CM = Metal boxes, cartons, cases (including roll-offs)
DF = Fiberboard or plastic drums, barrels, kegs	CW = Wooden boxes, cartons, cases
DT = Dump truck	CF = Fiber or plastic boxes, cartons, cases
TP = Tanks, portable	BA = Burlap, cloth, paper / plastic bags
TT = Cargo tanks (tank trucks)	
TC = Tank cars	

Item 13. Enter the total quantity of waste described on each line. Do not use decimals or fractions.

Item 14. Enter the appropriate abbreviation for the unit of measure listed below.

G = Gallons (liquids only)	L = Liters (liquids only)
P = Pounds	K = Kilograms
T = Tons (2000 lbs.)	M = Metric tons (1000 kg)
Y = Cubic yards	N = Cubic meters

Item 15. The generator may use this space to indicate special transportation, treatment, storage or disposal information. Import/Export information as noted in the "International Shipment" instructions section is to be recorded here.

Item 16. The generator must read, print his/her name, sign and date the certification statement.

Item 17. Print the name of the person accepting the waste on behalf of the first transporter. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

Item 18. If applicable, print the name of the person accepting the waste on behalf of the second transporter. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

Item 19. An authorized representative of the designated (or alternate) facility must note in this space any discrepancy in the waste shipment.

Item 20. Print the name of the person accepting the waste on behalf of the designated facility. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

NOTE: MDEQ "Rejected Load Procedures" provides guidance for partial or total load rejections.

Only the following information in the shaded area is a State of Michigan requirement:

Item A. A preprinted State manifest document number.

Item B - H. May be required by other states.

Item I. For hazardous wastes, enter the appropriate waste numbers found in R299.9212 through R299.9214 of Part 111 and 40 CFR 261 Subparts C and D. If more than one waste number is required to appropriately identify the waste, enter the additional numbers in item J. In selecting the most appropriate waste number the following hierarchy must be used: acute waste (including P and acute F), U (toxic), K (specific sources), non-acute F (non-specific sources) and D (characteristic). State regulated wastes follow the same hierarchy as federally regulated wastes. For Part 121 wastes which are not hazardous wastes enter the appropriate code listed below.

Mixed Solvents	007L	Storm Sewer Cleanouts	031L
Pharmaceutical	014L	Sanitary Sewer Cleanouts	032L
Crankcase Oil	017L	X-Ray/Photo Solutions	033L
Coolants and Water Soluble Oils	019L	Water Based Cleaning Solutions	034L
Other Oil (Describe in Item 11 or Item J)	021L	Car Wash Sludges	035L
Brine	022L	Grease Trap Wastes	036L
PCB	026L		
Other Wastes (Describe in Item 11 or Item J)	029L		
Antifreeze	030L		

Item J. Generators are to use this space for the site address if different from the mailing address noted in Item 3, additional waste codes, additional description for a Part 121 waste as noted in Item I of these instructions, approval of commingling authority as required in R299.9304(6).

Item K. List any specific codes which apply.

Burned for Energy Recovery	B
Conditionally Exempt Small Quantity Generator	C
Emergency Response Cleanup	E
Household Generated	H
Recycled Precious Metals	P
Recycled, Reclaimed, Used or Reused	R
Universal Waste	U

INTERNATIONAL SHIPMENTS

Exports- Transporters must sign and enter the date the waste leaves the United States in Item 15. The primary exporter must identify the point of departure from the United States.*

Imports- Shipments of hazardous and Part 121 regulated wastes must be accompanied by a U.S. EPA Uniform Hazardous Waste Manifest. Any person functioning as the U.S. Importer, as defined in Part 111, must complete the manifest as required in R299.9310*

*Transporters of hazardous waste shipments must deliver a copy of the manifest to U.S. Customs when importing or exporting the waste across U.S. borders. Record the foreign waste manifest document number in Item J.

MANIFEST DISTRIBUTION

GENERATOR: Upon placing the waste into transportation (first transporter signs and dates manifest) remove the white and gold banded copies and give the remainder of the manifest copies to the transporter. Sent the white copy to MDEQ no later than the tenth day of the month following the shipment. For shipments of wastes being transported to a designated facility outside of Michigan when an out-of-state manifest is used, mail to the MDEQ a photocopy of the manifest when the shipment is placed into transportation and mail a photocopy of the second generator manifest copy, when received.

TRANSPORTER: Upon delivery to the designated (or alternate) facility, and that facility signs and dates the manifest, the canary banded copy will be returned to you. If more than one transporter is used, the manifest is to be copied and supplied to the previous transporter acknowledging the receipt of the shipment by the next transporter. The canary banded copy stays with the manifest until the shipment reaches the designated facility.

DESIGNATED FACILITY: Upon signing and dating the manifest as received, give the canary banded

ADDRESS ALL MDEQ MANIFEST COPIES TO:
WASTE MANAGEMENT DIVISION
MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
PO BOX 30038
LANSING MI 48909-7538

The public reporting burden for this collection of information is estimated to average 31 minutes for generators, 16 minutes for transporters, and 16 minutes for treatment, storage and disposal facilities. The record-keeping burden per response for this collection of information is estimated to average 6 minutes for generators, 5 minutes for transporters, and 6 minutes for treatment, storage and disposal facilities. The burden associated with reading the regulations is estimated at 1 hour and 15 minutes annually. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency.

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB numbers for EPA's regulations are listed in 40 CFR Part 9 and 48 CFR Chapter 15. Send comments regarding these burden estimates or any other aspect of this collection, including suggestions for reducing the burden, including through use of automated collection techniques to the Director, OPPE Regulatory Information Division, U.S. Environmental Protection Agency (2 37), 401 M St. S.W., Washington, D.C., 20460 and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Attention: Desk Officer for EPA, 725 17th Street, N.W., Washington, D.C. 20503. Include the OMB control number in any correspondence.

CERTIFICATE OF DISPOSAL

This certificate is to verify the wastes specified on Manifest # MI9757326

have been properly disposed of in accordance with all local, state and federal regulations.

"Disposed of" means either: 1) Burial or 2) Processed as specified in 40 CFR et seq.

FACILITY NAME: *(Please check one)*

☒ Michigan Disposal Waste Treatment Plant (EPA I.D. # MID000724831)

☐ Wayne Disposal, Inc. (EPA I.D. # MID048090633)

ADDRESS: 49350 N. I-94 Service Drive
Belleville, Michigan 48111

PHONE NUMBER: 1-800-592-5489

FAX NUMBER: 1-800-592-5329

Authorized Signature: _____

THE ENVIRONMENTAL QUALITY COMPANY 49350 N. I-94 SERVICE DRIVE BELLEVILLE MICHIGAN 48111

FORM1020 (3/96)

MI0012842

DEQ WASTE MANAGEMENT DIVISION
MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY

DO NOT WRITE IN THIS SPACE
ATT. ☐ DIS. ☐ REJ. ☐ PR. ☐

Required under authority of Part 111 and Part 121 of Act 451, 1994, as amended.

Failure to file may subject you to criminal and/or civil penalties under Sections 324.11151 or 324.12116 MCL.

Please print or type.

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: MID005354386
Manifest Document No.:
2. Page 1 of 1
Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
WOLVERINE GASKET & MFG
2638 PRINCESS
INKSTER, MI 48141

4. Generator's Phone ( )517 610-1136 DOUG ROMMECK

A. State Manifest Document Number: MI 9757364
B. State Generator's ID:

5. Transporter 1 Company Name: G&C
6. US EPA ID Number: MIR000039701
C. State Transporter's ID:
D. Transporter's Phone: 734-295-6609

7. Transporter 2 Company Name:
8. US EPA ID Number:
E. State Transporter's ID:
F. Transporter's Phone:

9. Designated Facility Name and Site Address
MICHIGAN DISPOSALWASTE TREATMENT PLANT
49350 NORTH I94 SERVICE DRIVE
BELLEVILLE, MICHIGAN 48111
10. US EPA ID Number: MID000724831
G. State Facility's ID:
H. Facility's Phone: 800-592-5489

	HM	11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID NUMBER).	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	☐	NON RCRA/NON DOT REGULATED SOLIDS	001	DT	60000	P	SLUD
b.	☐						
c.	☐						
d.	☐						

J. Additional Descriptions for Materials Listed Above
APPROVAL# 11A 101904TBB (CONTAMINATED SOIL)

K. Handling Codes
a
b
c
d

15. Special Handling Instructions and Additional Information

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR; if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: [signature] Signature: [signature] Date: Month Day Year

17. Transporter 1 Acknowledgment of Receipt of Materials
Printed/Typed Name: [signature] Signature: [signature] Date: Month Day Year

18 Transporter 2 Acknowledgment of Receipt of Materials
Printed/Typed Name: Signature: [signature] Date: Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: Signature: Date: Month Day Year

GENERATOR

TRANSPORTER

FACILITY

ALL SPILLS MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHIGAN AT 1-800-292-4706 OR OUT OF STATE AT 517-373-7660 AND THE NATIONAL RESPONSE CENTER AT 1-800-424-8802 24 HOUR PER DAY.

EPA Form 8700-22 (Rev. 9/88) GENERATOR 2nd COPY EQP 5110 Rev. 7/03

MI0012843

GENERAL INSTRUCTIONS

Read all instructions before completing this form. This form has been designed for use on a 12-pitch (elite) typewriter/computer printer; a firm point pen may also be used - press down hard. Ensure all copies are legible.

Federal and state regulations require generators and transporters of hazardous waste and owners or operators of hazardous waste treatment, storage, and disposal facilities to use this form (8700-22) and, if necessary, the continuation sheet (Form 8700-22A) for both inter- and intrastate transportation of hazardous waste as defined in 40 CFR and Part 111 of Act 451 of 1994, as amended (Part 111). State regulations also require the use of this manifest for all regulated shipments of liquid industrial waste as required in Part 121 of Act 451 of 1994, as amended (Part 121).

Federal and State regulations provide for additional requirements, not included in these instructions, regarding the use and management of this form (40 CFR, 49 CFR, Part 111, Part 121).

Additional information such as "Rejected Load Procedures", state assigned identification numbers, manifest forms, etc., can be obtained by contacting the Michigan Department of Environmental Quality (MDEQ), Waste Management Divisions (WMD) Internet Home Page at http://www.deq.state.mi.us/wmd or you may contact the Manifest Unit directly at (517) 373-1217. Continuation sheets are not supplied by MDEQ.

Complete all items on the manifest. Enter "N/A" if any item does not apply. Leave items that may be needed later blank, such as a second transporter.

Item 1. Enter the generator's U.S. EPA twelve digit identification number. For Part 121 manifested shipments where a generator does not have a U.S. EPA assigned number, a state assigned number must be obtained and used. The generator of the waste must enter a unique five digit manifest document number (e.g. 00001).

Item 2. Page number 1 of 1 should be recorded unless a continuation sheet is used, in which case the total number of pages, counting the initial manifest page, should be shown.

Item 3. Enter the name of the generator and the mailing address to which the manifest should be mailed. If the address of the site at which the waste was placed into transportation is different from the mailing address record the site address in Item J.

Item 4. Enter a telephone number (including area code) where an authorized agent of the generator can be reached in the event of an emergency and/or a partial or total rejected load.

NOTE: The 24 hour emergency phone number required for a hazardous materials shipping paper may be different from the generator's phone number.

Item 5. Enter the company name of the first transporter who will transport the waste.

Item 6. Enter the transporter's U.S. EPA twelve digit identification number. For Part 121 manifested shipments where a transporter does not have a U.S. EPA assigned number, a state assigned number is to be used.

Item 7. If using a second transporter, enter the company name.

Item 8. Enter the second transporter's U.S. EPA twelve digit identification number. For Part 121 manifested shipments where a transporter does not have a U.S. EPA assigned number, a state number is to be used.

NOTE: If more than two transporters are used, the generator or third transporter shall initiate a continuation sheet. In Item L of the continuation sheet, the generator/transporter must copy the State manifest document number listed in Item A. Every transport company used between the generator and the designated facility (except for intermediate rail or barge transporters used between the initial rail or barge carriers and the designated facility) must be listed. This is not intended to require multiple signatures for individual drivers working for one transporter. Item 2 is to be changed to reflect the added page(s). Continuation sheets must be appropriately completed in their entirety and properly distributed. Continuation sheets may not be used to list additional waste streams.

Item 9. Enter the company name and site address of the facility designated to receive the waste listed on this manifest.

Item 10. Enter the U.S. EPA twelve digit identification number for the designated facility described in Item 9. For Part 121 manifested shipments where a designated facility does not have a U.S. EPA assigned number, a state assigned number is to be used.

Item 11. Enter an X in the HM box if the waste is a hazardous material regulate by U.S. DOT (See 49 CFR 172). Enter the required U.S. DOT shipping description, including Proper Shipping Name, Hazard Class or Division, ID Number (UN/NA)" and packing group for each waste as identified in 49 CFR 172. Additional information may also be required in this space, including technical name and reportable quantity references. For only Part 121 regulated wastes include an appropriate shipping description for the waste stream.

Item 12. Enter the number of containers for each waste and the appropriate abbreviations listed below for the type of container. Each container type requires separate entry.

DM = Metal drums, barrels, kegs	CY = Cylinders
DW = Wooden drums, barrels, kegs	CM = Metal boxes, cartons, cases (including roll-offs)
DF = Fiberboard or plastic drums, barrels, kegs	CW = Wooden boxes, cartons, cases
DT = Dump truck	CF = Fiber or plastic boxes, cartons, cases
TP = Tanks, portable	BA = Burlap, cloth, paper / plastic bags
TT = Cargo tanks (tank trucks)	
TC = Tank cars	

Item 13. Enter the total quantity of waste described on each line. Do not use decimals or fractions.

Item 14. Enter the appropriate abbreviation for the unit of measure listed below.

G = Gallons (liquids only)	L = Liters (liquids only)
P = Pounds	K = Kilograms
T = Tons (2000 lbs.)	M = Metric tons (1000 kg)
Y = Cubic yards	N = Cubic meters

Item 15. The generator may use this space to indicate special transportation, treatment, storage or disposal information. Import/Export information as noted in the "International Shipment" instructions section is to be recorded here.

Item 16. The generator must read, print his/her name, sign and date the certification statement.

Item 17. Print the name of the person accepting the waste on behalf of the first transporter. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

Item 18. If applicable, print the name of the person accepting the waste on behalf of the second transporter. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

Item 19. An authorized representative of the designated (or alternate) facility must note in this space any discrepancy in the waste shipment.

Item 20. Print the name of the person accepting the waste on behalf of the designated facility. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

NOTE: MDEQ "Rejected Load Procedures" provides guidance for partial or total load rejections.

Only the following information in the shaded area is a State of Michigan requirement:

Item A. A preprinted State manifest document number.

Item B - H. May be required by other states.

Item I. For hazardous wastes, enter the appropriate waste numbers found in R299.9212 through R299.9214 of Part 111 and 40 CFR 261 Subparts C and D. If more than one waste number is required to appropriately identify the waste, enter the additional numbers in Item J. In selecting the most appropriate waste number the following hierarchy must be used: acute waste (including P and acute F), U (toxic), K (specific sources), non-acute F (non-specific sources), and D (characteristic). State regulated wastes follow the same hierarchy as federally regulated wastes. For Part 121 wastes which are not hazardous wastes enter the appropriate code listed below.

Mixed Solvents	007L	Storm Sewer Cleanouts	031L
Pharmaceutical	014L	Sanitary Sewer Cleanouts	032L
Crankcase Oil	017L	X-Ray/Photo Solutions	033L
Coolants and Water Soluble Oils	019L	Water Based Cleaning Solutions	034L
Other Oil (Describe in Item 11 or Item J)	021L	Car Wash Sludges	035L
Brine	022L	Grease Trap Wastes	036L
PCB	026L		
Other Wastes (Describe in Item 11 or Item J)	029L		
Antifreeze	030L		

Item J. Generators are to use this space for the site address if different from the mailing address noted in Item 3, additional waste codes, additional description for a Part 121 waste as noted in Item I of these instructions, approval of commingling authority as required in R299.9304(6).

Item K. List any specific codes which apply.

Burned for Energy Recovery	B
Conditionally Exempt Small Quantity Generator	C
Emergency Response Cleanup	E
Household Generated	H
Recycled Precious Metals	P
Recycled, Reclaimed, Used or Reused	R
Universal Waste	U

INTERNATIONAL SHIPMENTS

Exports- Transporters must sign and enter the date the waste leaves the United States in Item 15. The primary exporter must identify the point of departure from the United States.*

Imports- Shipments of hazardous and Part 121 regulated wastes must be accompanied by a U.S. EPA Uniform Hazardous Waste Manifest. Any person functioning as the U.S. Importer, as defined in Part 111, must complete the manifest as required in R299.9310*

*Transporters of hazardous waste shipments must deliver a copy of the manifest to U.S. Customs when importing or exporting the waste across U.S. borders. - Record the foreign waste manifest document number in Item J.

MANIFEST DISTRIBUTION

GENERATOR: Upon placing the waste into transportation (first transporter signs and dates manifest) remove the white and gold banded copies and give the remainder of the manifest copies to the transporter. Sent the white copy to MDEQ no later than the tenth day of the month following the shipment. For shipments of wastes being transported to a designated facility outside of Michigan when an out-of-state manifest is used, mail to the MDEQ a photocopy of the manifest when the shipment is placed into transportation and mail a photocopy of the second generator manifest copy, when received.

TRANSPORTER: Upon delivery to the designated (or alternate) facility, and that facility signs and dates the manifest, the canary banded copy will be returned to you. If more than one transporter is used, the manifest is to be copied and supplied to the previous transporter acknowledging the receipt of the shipment by the next transporter. The canary banded copy stays with the manifest until the shipment reaches the designated facility.

DESIGNATED FACILITY: Upon signing and dating the manifest as received, give the canary banded

ADDRESS ALL MDEQ MANIFEST COPIES TO:
WASTE MANAGEMENT DIVISION
MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
PO BOX 30038
LANSING MI 48909-7538

The public reporting burden for this collection of information is estimated to average 31 minutes for generators, 18 minutes for transporters, and 15 minutes for treatment, storage and disposal facilities. The record-keeping burden per response for this collection of information is estimated to average 6 minutes for generators, 6 minutes for transporters, and 6 minutes for treatment, storage and disposal facilities. The burden associated with reading the regulations is estimated at 1 hour and 15 minutes annually. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency.

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB numbers for EPA's regulations are listed in 40 CFR Part 9 and 48 CFR Chapter 15. Send comments regarding these burden statements or any other aspect of this collection, including suggestions for reducing this burden, including through use of automated collection techniques to the Director, OPPE Regulatory Information Division, U.S. Environmental Protection Agency (2.37), 401 M St., S.W., Washington, D.C., 20460 and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Attention: Desk Officer for EPA, 725 17th Street, N.W., Washington, D.C. 20503, Include the OMB control number in any correspondence.

CERTIFICATE OF DISPOSAL

This certificate is to verify the wastes specified on Manifest # MI9757364

have been properly disposed of in accordance with all local, state and federal regulations.

"Disposed of" means either: 1) Burial or 2) Processed as specified in 40 CFR et seq.

FACILITY NAME: ☑ Michigan Disposal Waste Treatment Plant (EPA I.D. # MID000724831) ☐ Wayne Disposal, Inc. (EPA I.D. # MID048090633)
(Please check one)

ADDRESS: 49350 N. I-94 Service Drive
Belleville, Michigan 48111

PHONE NUMBER: 1-800-592-5489

FAX NUMBER: 1-800-592-5329

Authorized Signature: _____

THE ENVIRONMENTAL QUALITY COMPANY 49350 N. I-94 SERVICE DRIVE BELLEVILLE MICHIGAN 48111

FORM1020 (3/96)

MI0012845

WASTE MANAGEMENT DIVISION
MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY

DO NOT WRITE IN THIS SPACE
ATT. ☐ DIS. ☐ REJ. ☐ PR. ☐

Required under authority of Part 111 and Part 121 of Act 451, 1994, as amended.

Failure to file may subject you to criminal and/or civil penalties under Sections 324.11151 or 324.12116 MCL.

Please print or type.

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. MID005364386
Manifest Document No.
2. Page 1 of 1

Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
[illegible] & MFG
2041 PRINCESS
INKSTER, MI 48141
4. Generator's Phone (617 810-1130 DOUG ROMMECK

A. State Manifest Document Number MI 9757380
B. State Generator's ID

5. Transporter 1 Company Name EQIS
6. US EPA ID Number MID000026371
C. State Transporter's ID
D. Transporter's Phone

7. Transporter 2 Company Name
8. US EPA ID Number
E. State Transporter's ID
F. Transporter's Phone

9. Designated Facility Name and Site Address WASTE TREATMENT PLANT
49250 NORTH I94 SERVICE DRIVE
BELLEVILLE, MICHIGAN 48111
US EPA ID Number MID000724831
G. State Facility's ID
H. Facility's Phone 800-592-5489

	11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID NUMBER).	HM	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	NON RCRA/NON DOT REGULATED SOLIDS	☐	001	DT	64540	P	SLUD
b.		☐					
c.		☐					
d.		☐					

J. Additional Descriptions for Materials Listed Above
APPROVAL# 11A 101904100 (CONTAMINATED SOIL)

K. Handling Codes
a
b
c
d

15. Special Handling Instructions and Additional Information

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR; if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

GENERATOR

Printed/Typed Name: Douglas Rommeck
Signature
Date: Month 10 Day 27 Year 04

TRANSPORTER

17. Transporter 1 Acknowledgment of Receipt of Materials
Printed/Typed Name: Andrew Freeman
Signature: Andrew Freeman
Date: Month 10 Day 27 Year 04

18 Transporter 2 Acknowledgment of Receipt of Materials
Printed/Typed Name
Signature
Date: Month Day Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: [illegible]
Signature
Date: Month 11 Day 17 Year 04

ALL SPILLS MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHIGAN AT 1-800-292-4706 OR OUT OF STATE AT 517-373-7660 AND THE NATIONAL RESPONSE CENTER AT 1-800-424-8802 24 HOUR PER DAY.

EPA Form 8700-22 (Rev. 9/88) GENERATOR 2nd COPY EQP 5110 Rev. 7/03

MI0012846

GENERAL INSTRUCTIONS

Read all instructions before completing this form. This form has been designed for use on a 12-pitch (elite) typewriter/computer printer: a firm point pen may also be used - press down hard. Ensure all copies are legible.

Federal and state regulations require generators and transporters of hazardous waste and owners or operators of hazardous waste treatment, storage, and disposal facilities to use this form (8700-22) and, if necessary, the continuation sheet (Form 8700-22A) for both inter- and intrastate transportation of hazardous waste as defined in 40 CFR and Part 111 of Act 451 of 1994, as amended (Part 111). State regulations also require the use of this manifest for all regulated shipments of liquid industrial waste as required in Part 121 of Act 451 of 1994, as amended (Part 121).

Federal and State regulations provide for additional requirements, not included in these instructions, regarding the use and management of this form (40 CFR, 49 CFR, Part 111, Part 121).

Additional information such as "Rejected Load Procedures", state assigned identification numbers, manifest forms, etc., can be obtained by contacting the Michigan Department of Environmental Quality (MDEQ), Waste Management Divisions (WMD) Internet Home Page at http://www.deq.state.mi.us/wmd or you may contact the Manifest Unit directly at (517) 373-1217. Continuation sheets are not supplied by MDEQ.

Complete *all* items on the manifest. Enter "N/A" if any item does not apply. Leave items that may be needed later blank, such as a second transporter.

Item 1. Enter the generator's U.S. EPA twelve digit identification number. For Part 121 manifested shipments where a generator does not have a U.S. EPA assigned number, a state assigned number must be obtained and used. The generator of the waste must enter a unique five digit manifest document number (e.g. 00001).

Item 2. Page number 1 of 1 should be recorded unless a continuation sheet is used, in which case the total number of pages, counting the initial manifest page, should be shown.

Item 3. Enter the name of the generator and the mailing address to which the manifest should be mailed. If the address of the site at which the waste was placed into transportation is different from the mailing address record the site address in item J.

Item 4. Enter a telephone number (including area code) where an authorized agent of the generator can be reached in the event of an emergency and/or a partial or total rejected load.

NOTE: The 24 hour emergency phone number required for a hazardous materials shipping paper may be different from the generator's phone number.

Item 5. Enter the company name of the first transporter who will transport the waste.

Item 6. Enter the transporter's U.S. EPA twelve digit identification number. For Part 121 manifested shipments where a transporter does not have a U.S. EPA assigned number, a state assigned number is to be used.

Item 7. If using a second transporter, enter the company name.

Item 8. Enter the second transporter's U.S. EPA twelve digit identification number. For Part 121 manifested shipments where a transporter does not have a U.S. EPA assigned number, a state number is to be used.

NOTE: If more than two transporters are used, the generator or third transporter shall initiate a continuation sheet. In Item L of the continuation sheet, the generator/transporter must copy the State manifest document number listed in Item A. Every transport company used between the generator and the designated facility (except for intermediate rail or barge transporters used between the initial rail or barge carriers and the designated facility) must be listed. This is not intended to require multiple signatures for individual drivers working for one transporter. Item 2 is to be changed to reflect the added page(s). Continuation sheets must be appropriately completed in their entirety and properly distributed. Continuation sheets may not be used to list additional waste streams.

Item 9. Enter the company name and site address of the facility designated to receive the waste listed on this manifest.

Item 10. Enter the U.S. EPA twelve digit identification number for the designated facility described in Item 9. For Part 121 manifested shipments where a designated facility does not have a U.S. EPA assigned number, a state assigned number is to be used.

Item 11. Enter an X in the HM box if the waste is a hazardous material regulate by U.S. DOT (See 49 CFR 172). Enter the required U.S. DOT shipping description, including Proper Shipping Name, Hazard Class or Division, ID Number (UN/NA), and packing group for each waste as identified in 49 CFR 172. Additional information may also be required in this space, including technical name and reportable quantity references. For only Part 121 regulated wastes include an appropriate shipping description for the waste stream.

Item 12. Enter the number of containers for each waste and the appropriate abbreviations listed below for the type of container. Each container type requires separate entry.

DM = Metal drums, barrels, kegs	CY = Cylinders
DW = Wooden drums, barrels, kegs	CM = Metal boxes, cartons, cases (including roll-offs)
DF = Fiberboard or plastic drums, barrels, kegs	CW = Wooden boxes, cartons, cases
DT = Dump truck	CF = Fiber or plastic boxes, cartons, cases
TP = Tanks, portable	BA = Burlap, cloth, paper / plastic bags
TT = Cargo tanks (tank trucks)	
TC = Tank cars	

Item 13. Enter the total quantity of waste described on each line. Do not use decimals or fractions.

Item 14. Enter the appropriate abbreviation for the unit of measure listed below.

G = Gallons (liquids only)	L = Liters (liquids only)
P = Pounds	K = Kilograms
T = Tons (2000 lbs.)	M = Metric tons (1000 kg)
Y = Cubic yards	N = Cubic meters

Item 15. The generator may use this space to indicate special transportation, treatment, storage or disposal information. Import/Export information as noted in the "International Shipment" instructions section is to be recorded here.

Item 16. The generator must read, print his/her name, sign and date the certification statement.

Item 17. Print the name of the person accepting the waste on behalf of the first transporter. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

Item 18. If applicable, print the name of the person accepting the waste on behalf of the second transporter. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

Item 19. An authorized representative of the designated (or alternate) facility must note in this space any discrepancy in the waste shipment.

Item 20. Print the name of the person accepting the waste on behalf of the designated facility. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

NOTE: MDEQ "Rejected Load Procedures" provides guidance for partial or total load rejections.

Only the following information in the shaded area is a State of Michigan requirement:

Item A. A preprinted State manifest document number.

Item B - H. May be required by other states.

Item I. For hazardous wastes, enter the appropriate waste numbers found in R299.9212 through R299.9214 of Part 111 and 40 CFR 261 Subparts C and D. If more than one waste number is required to appropriately identify the waste, enter the additional numbers in item J. In selecting the most appropriate waste number the following hierarchy must be used: acute waste (including P and acute F), U (toxic), K (specific sources), non-acute F (non-specific sources) and D (characteristic). State regulated wastes follow the same hierarchy as federally regulated wastes. For Part 121 wastes which are not hazardous wastes enter the appropriate code listed below.

Mixed Solvents	007L	Storm Sewer Cleanouts	031L
Pharmaceutical	014L	Sanitary Sewer Cleanouts	032L
Crankcase Oil	017L	X-Ray/Photo Solutions	033L
Coolants and Water Soluble Oils	019L	Water Based Cleaning Solutions	034L
Other Oil (Describe in Item 11 or Item J)	021L	Car Wash Sludges	035L
Brine	022L	Grease Trap Wastes	036L
PCB	026L		
Other Wastes (Describe in Item 11 or Item J)	029L		
Antifreeze	030L		

Item J. Generators are to use this space for the site address if different from the mailing address noted in Item 3, additional waste codes, additional description for a Part 121 waste as noted in Item I of these instructions, approval of commingling authority as required in R299.9304(6).

Item K. List any specific codes which apply.

Burned for Energy Recovery	B
Conditionally Exempt Small Quantity Generator	C
Emergency Response Cleanup	E
Household Generated	H
Recycled Precious Metals	P
Recycled, Reclaimed, Used or Reused	R
Universal Waste	U

INTERNATIONAL SHIPMENTS

Exports- Transporters must sign and enter the date the waste leaves the United States in Item 15. The primary exporter must identify the point of departure from the United States.*

Imports- Shipments of hazardous and Part 121 regulated wastes must be accompanied by a U.S. EPA Uniform Hazardous Waste Manifest. Any person functioning as the U.S. Importer, as defined in Part 111, must complete the manifest as required in R299.9310*

*Transporters of hazardous waste shipments must deliver a copy of the manifest to U.S. Customs when importing or exporting the waste across U.S. borders. Record the foreign waste manifest document number in Item J.

MANIFEST DISTRIBUTION

GENERATOR: Upon placing the waste into transportation (first transporter signs and dates manifest) remove the white and gold banded copies and give the remainder of the manifest copies to the transporter. Sent the white copy to MDEQ no later than the tenth day of the month following the shipment. For shipments of wastes being transported to a designated facility outside of Michigan when an out-of-state manifest is used, mail to the MDEQ a photocopy of the manifest when the shipment is placed into transportation and mail a photocopy of the second generator manifest copy, when received.

TRANSPORTER: Upon delivery to the designated (or alternate) facility, and that facility signs and dates the manifest, the canary banded copy will be returned to you. If more than one transporter is used, the manifest is to be copied and supplied to the previous transporter acknowledging the receipt of the shipment by the next transporter. The canary banded copy stays with the manifest until the shipment reaches the designated facility.

DESIGNATED FACILITY: Upon signing and dating the manifest as received, give the canary banded

ADDRESS ALL MDEQ MANIFEST COPIES TO:
WASTE MANAGEMENT DIVISION
MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
PO BOX 30038
LANSING MI 48909-7538

The public reporting burden for this collection of information is estimated to average 31 minutes for generators, 16 minutes for transporters, and 18 minutes for treatment, storage and disposal facilities. The record-keeping burden per response for this collection of information is estimated to average 6 minutes for generators, 6 minutes for transporters, and 6 minutes for treatment, storage and disposal facilities. The burden associated with reading the regulations is estimated at 1 hour and 15 minutes annually. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency.

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB numbers for EPA's regulations are listed in 40 CFR Part 9 and 48 CFR Chapter 15. Send comments regarding these burden statements or any other aspect of this collection, including suggestions for reducing the burden, including through use of automated collection techniques to the Director, OPPE Regulatory Information Division, U.S. Environmental Protection Agency (2.37), 401 M St., S.W., Washington, D.C., 20460 and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Attention: Desk Officer for EPA, 725 17th Street, N.W., Washington, D.C. 20503. Include the OMB control number in any correspondence.

MI0012847

WASTE MANAGEMENT DIVISION
MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY

DO NOT WRITE IN THIS SPACE
ATT. ☐ DIS. ☐ REJ. ☐ PR. ☐

Required under authority of Part 111 and Part 121 of Act 451, 1994, as amended.

Failure to file may subject you to criminal and/or civil penalties under Sections 324.11151 or 324.12116 MCL.

Please print or type.

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. MID005354386
Manifest Document No.
2. Page 1 of 1
Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address: WAL-MART FIXTURE & MFG
2039 PRINCESS
INKSTER, MI 49141
4. Generator's Phone (517 610 1130 DOUG ROMMECK)

A. State Manifest Document Number MI 9757380
B. State Generator's ID

5. Transporter 1 Company Name EQIS
6. US EPA ID Number MI0 120 081 871
C. State Transporter's ID
D. Transporter's Phone

7. Transporter 2 Company Name
8. US EPA ID Number
E. State Transporter's ID
F. Transporter's Phone

9. Designated Facility Name and Site Address: MIDWEST DISPOSAL WASTE TREATMENT PLANT
49330 NORTH I94 SERVICE DRIVE
BELLEVILLE, MICHIGAN 48111
US EPA ID Number MID000724831
G. State Facility's ID
H. Facility's Phone 800-592-5489

	HM	11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID NUMBER).	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	☐	NON RCRA/NON DOT REGULATED SOLIDS	001	DT	64540	P	SLUD
b.	☐						
c.	☐						
d.	☐						

J. Additional Descriptions for Materials Listed Above
APPROVAL # 11A 101004TBB (CONTAMINATED SOIL)

K. Handling Codes
a
b
c
d

15. Special Handling Instructions and Additional Information

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR; if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: Doug Rommeck
Signature
Date: Month 10 Day 27 Year 04

17. Transporter 1 Acknowledgment of Receipt of Materials
Printed/Typed Name: Andrew Fleming
Signature: Andrew Fleming
Date: Month 10 Day 27 Year 04

18 Transporter 2 Acknowledgment of Receipt of Materials
Printed/Typed Name
Signature
Date: Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: Chris McMahon
Signature
Date: Month Day Year

GENERATOR
TRANSPORTER
FACILITY

ALL SPILLS MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHIGAN AT 1-800-292-4706 OR OUT OF STATE AT 517-373-7660 AND THE NATIONAL RESPONSE CENTER AT 1-800-424-8802 24 HOUR PER DAY.

EPA Form 8700-22 (Rev. 9/88)
GENERATOR 1st COPY
EQP 5110 Rev. 7/03

MI0012848

GENERAL INSTRUCTIONS

Read all instructions before completing this form. This form has been designed for use on a 12-pitch (elite) typewriter/computer printer: a firm point pen may also be used - press down hard. Ensure all copies are legible.

Federal and state regulations require generators and transporters of hazardous waste and owners or operators of hazardous waste treatment, storage, and disposal facilities to use this form (8700-22) and, if necessary, the continuation sheet (Form 8700-22A) for both inter- and intrastate transportation of hazardous waste as defined in 40 CFR and Part 111 of Act 451 of 1994, as amended (Part 111). State regulations also require the use of this manifest for all regulated shipments of liquid industrial waste as required in Part 121 of Act 451 of 1994, as amended (Part 121).

Federal and State regulations provide for additional requirements, not included in these instructions, regarding the use and management of this form (40 CFR, 49 CFR, Part 111, Part 121).

Additional information such as "Rejected Load Procedures", state assigned identification numbers, manifest forms, etc., can be obtained by contacting the Michigan Department of Environmental Quality (MDEQ), Waste Management Divisions (WMD) Internet Home Page at http://www.deq.state.mi.us/wmd or you may contact the Manifest Unit directly at (517) 373-1217. Continuation sheets are not supplied by MDEQ.

Complete all items on the manifest. Enter "N/A" if any item does not apply. Leave items that may be needed later blank, such as a second transporter.

Item 1. Enter the generator's U.S. EPA twelve digit identification number. For Part 121 manifested shipments where a generator does not have a U.S. EPA assigned number, a state assigned number must be obtained and used. The generator of the waste must enter a unique five digit manifest document number (e.g. 00001).

Item 2. Page number 1 of 1 should be recorded unless a continuation sheet is used, in which case the total number of pages, counting the initial manifest page, should be shown.

Item 3. Enter the name of the generator and the mailing address to which the manifest should be mailed. If the address of the site at which the waste was placed into transportation is different from the mailing address record the site address in item J.

Item 4. Enter a telephone number (including area code) where an authorized agent of the generator can be reached in the event of an emergency and/or a partial or total rejected load.

NOTE: The 24 hour emergency phone number required for a hazardous materials shipping paper may be different from the generator's phone number.

Item 5. Enter the company name of the first transporter who will transport the waste.

Item 6. Enter the transporter's U.S. EPA twelve digit identification number. For Part 121 manifested shipments where a transporter does not have a U.S. EPA assigned number, a state assigned number is to be used.

Item 7. If using a second transporter, enter the company name.

Item 8. Enter the second transporter's U.S. EPA twelve digit identification number. For Part 121 manifested shipments where a transporter does not have a U.S. EPA assigned number, a state number is to be used.

NOTE: If more than two transporters are used, the generator or third transporter shall initiate a continuation sheet. In Item L of the continuation sheet, the generator/transporter must copy the State manifest document number listed in Item A. Every transport company used between the generator and the designated facility (except for intermediate rail or barge transporters used between the initial rail or barge carriers and the designated facility) must be listed. This is not intended to require multiple signatures for individual drivers working for one transporter. Item 2 is to be changed to reflect the added page(s). Continuation sheets must be appropriately completed in their entirety and properly distributed. Continuation sheets may not be used to list additional waste streams.

Item 9. Enter the company name and site address of the facility designated to receive the waste listed on this manifest.

Item 10. Enter the U.S. EPA twelve digit identification number for the designated facility described in Item 9. For Part 121 manifested shipments where a designated facility does not have a U.S. EPA assigned number, a state assigned number is to be used.

Item 11. Enter an X in the HM box if the waste is a hazardous material regulate by U.S. DOT (See 49 CFR 172). Enter the required U.S. DOT shipping description, including Proper Shipping Name, Hazard Class or Division, ID Number (UN/NA), and packing group for each waste as identified in 49 CFR 172. Additional information may also be required in this space, including technical name and reportable quantity references. For only Part 121 regulated wastes include an appropriate shipping description for the waste stream.

Item 12. Enter the number of containers for each waste and the appropriate abbreviations listed below for the type of container. Each container type requires separate entry.

DM = Metal drums, barrels, kegs	CY = Cylinders
DW = Wooden drums, barrels, kegs	CM = Metal boxes, cartons, cases (including roll-offs)
DF = Fiberboard or plastic drums, barrels, kegs	CW = Wooden boxes, cartons, cases
DT = Dump truck	CF = Fiber or plastic boxes, cartons, cases
TP = Tanks, portable	BA = Burlap, cloth, paper / plastic bags
TT = Cargo tanks (tank trucks)	
TC = Tank cars	

Item 13. Enter the total quantity of waste described on each line. Do not use decimals or fractions.

Item 14. Enter the appropriate abbreviation for the unit of measure listed below.

G = Gallons (liquids only)	L = Liters (liquids only)
P = Pounds	K = Kilograms
T = Tons (2000 lbs.)	M = Metric tons (1000 kg)
Y = Cubic yards	N = Cubic meters

Item 15. The generator may use this space to indicate special transportation, treatment, storage or disposal information. Import/Export information as noted in the "International Shipment" instructions section is to be recorded here.

Item 16. The generator must read, print his/her name, sign and date the certification statement.

Item 17. Print the name of the person accepting the waste on behalf of the first transporter. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

Item 18. If applicable, print the name of the person accepting the waste on behalf of the second transporter. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

Item 19. An authorized representative of the designated (or alternate) facility must note in this space any discrepancy in the waste shipment.

Item 20. Print the name of the person accepting the waste on behalf of the designated facility. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

NOTE: MDEQ "Rejected Load Procedures" provides guidance for partial or total load rejections.

Only the following information in the shaded area is a State of Michigan requirement:

Item A. A preprinted State manifest document number.

Item B - H. May be required by other states.

Item I. For hazardous wastes, enter the appropriate waste numbers found in R299.9212 through R299.9214 of Part 111 and 40 CFR 261 Subparts C and D. If more than one waste number is required to appropriately identify the waste, enter the additional numbers in item J. In selecting the most appropriate waste number the following hierarchy must be used: acute waste (including P and acute F), U (toxic), K (specific sources), non-acute F (non-specific sources) and D (characteristic). State regulated wastes follow the same hierarchy as federally regulated wastes. For Part 121 wastes which are not hazardous wastes enter the appropriate code listed below.

Mixed Solvents	007L	Storm Sewer Cleanouts	031L
Pharmaceutical	014L	Sanitary Sewer Cleanouts	032L
Crankcase Oil	017L	X-Ray/Photo Solutions	033L
Coolants and Water Soluble Oils	019L	Water Based Cleaning Solutions	034L
Other Oil (Describe in Item 11 or Item J)	021L	Car Wash Sludges	035L
Brine	022L	Grease Trap Wastes	036L
PCB	026L		
Other Wastes (Describe in Item 11 or Item J)	029L		
Antifreeze	030L		

Item J. Generators are to use this space for the site address if different from the mailing address noted in Item 3, additional waste codes, additional description for a Part 121 waste as noted in Item I of these instructions, approval of commingling authority as required in R299.9304(6).

Item K. List any specific codes which apply.

Burned for Energy Recovery	B
Conditionally Exempt Small Quantity Generator	C
Emergency Response Cleanup	E
Household Generated	H
Recycled Precious Metals	P
Recycled, Reclaimed, Used or Reused	R
Universal Waste	U

INTERNATIONAL SHIPMENTS

Exports- Transporters must sign and enter the date the waste leaves the United States in Item 15. The primary exporter must identify the point of departure from the United States.*

Imports- Shipments of hazardous and Part 121 regulated wastes must be accompanied by a U.S. EPA Uniform Hazardous Waste Manifest. Any person functioning as the U.S. importer, as defined in Part 111, must complete the manifest as required in R299.9310*

*Transporters of hazardous waste shipments must deliver a copy of the manifest to U.S. Customs when importing or exporting the waste across U.S. borders. Record the foreign waste manifest document number in Item J.

MANIFEST DISTRIBUTION

GENERATOR: Upon placing the waste into transportation (first transporter signs and dates manifest) remove the white and gold banded copies and give the remainder of the manifest copies to the transporter. Sent the white copy to MDEQ no later than the tenth day of the month following the shipment. For shipments of wastes being transported to a designated facility outside of Michigan when an out-of-state manifest is used, mail to the MDEQ a photocopy of the manifest when the shipment is placed into transportation and mail a photocopy of the second generator manifest copy, when received.

TRANSPORTER: Upon delivery to the designated (or alternate) facility, and that facility signs and dates the manifest, the canary banded copy will be returned to you. If more than one transporter is used, the manifest is to be copied and supplied to the previous transporter acknowledging the receipt of the shipment by the next transporter. the canary banded copy stays with the manifest until the shipment reaches the designated facility.

DESIGNATED FACILITY: Upon signing and dating the manifest as received, give the canary banded

ADDRESS ALL MDEQ MANIFEST COPIES TO:
WASTE MANAGEMENT DIVISION
MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
PO BOX 30038
LANSING MI 48909-7538

The public reporting burden for this collection of information is estimated to average 31 minutes for generators, 16 minutes for transporters, and 16 minutes for treatments, storage and disposal facilities. The record-keeping burden per response for this collection of information is estimated to average 6 minutes for generators, 6 minutes for transporters, and 6 minutes for treatment, storage and disposal facilities. The burden associated with reading the regulations is estimated at 1 hour and 15 minutes annually. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency.

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB numbers for EPA's regulations are listed in 40 CFR Part 9 and 48 CFR Chapter 15. Send comments regarding these burden statements or any other aspect of this collection, including suggestions for reducing the burden, including through use of automated collection techniques to the Director, OPPE Regulatory Information Division, U.S. Environmental Protection Agency (2 37), 401 M St., S.W., Washington, D.C., 20460 and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Attention: Desk Office for EPA, 725 17th Street, N.W., Washington, D.C. 20503. Include the OMB control number in any correspondence.

MI0012849

DEQ WASTE MANAGEMENT DIVISION
MICHIGAN DEPARTMENT OF
ENVIRONMENTAL QUALITY

DO NOT WRITE IN THIS SPACE
ATT. ☐ DIS. ☐ REJ. ☐ PR. ☐

Required under authority of Part 111 and Part 121 of Act 451, 1994, as amended.

Failure to file may subject you to criminal and/or civil penalties under Sections 324.11151 or 324.12116 MCL.

Please print or type.

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. MID005354386

Manifest Document No.

2. Page 1 of 1

Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address: WOLVERINE GASKET & MFG. 2628 PRINCESS INKSTER, MI 48141

DEC 13 2004

4. Generator's Phone (517) 610-1136 DOUG ROMMECK

A. State Manifest Document Number: MI 9757376

B. State Generator's ID

5. Transporter 1 Company Name: GSC

6. US EPA ID Number: MIR000035751

C. State Transporter's ID

D. Transporter's Phone: 734-206-6500

7. Transporter 2 Company Name

8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address: MICHIGAN DISPOSAL WASTE TREATMENT PLANT 49350 NORTH 194 SERVICE DRIVE BELLEVILLE, MICHIGAN 48111

10. US EPA ID Number: MID000724831

G. State Facility's ID

H. Facility's Phone: 800-592-5489

	HM	11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID NUMBER).	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	☐	NON RCRA/NON DOT REGULATED SOLIDS	001	DT		P	SLUD
b.	☐						
c.	☐						
d.	☐						

J. Additional Descriptions for Materials Listed Above
APPROVAL# 11A 101904TBB (CONTAMINATED SOIL)

K. Handling Codes
a
b
c
d

15. Special Handling Instructions and Additional Information

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR; if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name	Signature	Date Month Day Year
Douglas Rommeck	[signature]	10 27 04

17. Transporter 1 Acknowledgment of Receipt of Materials

Printed/Typed Name	Signature	Date Month Day Year
Tom Thomson	[signature]	10 27 04

18. Transporter 2 Acknowledgment of Receipt of Materials

Printed/Typed Name	Signature	Date Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Date Month Day Year
		10 27 04

GENERATOR

TRANSPORTER

FACILITY

ALL SPILLS MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHIGAN AT 1-800-292-4706 OR OUT OF STATE AT 517-373-7660 AND THE NATIONAL RESPONSE CENTER AT 1-800-424-8802 24 HOUR PER DAY.

EPA Form 8700-22 (Rev. 9/88) GENERATOR 2nd COPY EQP 5110 Rev. 7/03

MI0012850

GENERAL INSTRUCTIONS

Read all instructions before completing this form. This form has been designed for use on a 12-pitch (elite) typewriter/computer printer; a firm point pen may also be used - press down hard. Ensure all copies are legible.

Federal and state regulations require generators and transporters of hazardous waste and owners or operators of hazardous waste treatment, storage, and disposal facilities to use this form (8700-22) and, if necessary, the continuation sheet (Form 8700-22A) for both inter- and intrastate transportation of hazardous waste as defined in 40 CFR and Part 111 of Act 451 of 1994, as amended (Part 111). State regulations also require the use of this manifest for all regulated shipments of liquid industrial waste as required in Part 121 of Act 451 of 1994, as amended (Part 121).

Federal and State regulations provide for additional requirements, not included in these instructions, regarding the use and management of this form (40 CFR, 49 CFR, Part 111, Part 121).

Additional information such as "Rejected Load Procedures", state assigned identification numbers, manifest forms, etc., can be obtained by contacting the Michigan Department of Environmental Quality (MDEQ), Waste Management Divisions (WMD) Internet Home Page at http://www.deq.state.mi.us/wmd or you may contact the Manifest Unit directly at (517) 373-1217. Continuation sheets are not supplied by MDEQ.

Complete all items on the manifest. Enter "N/A" if any item does not apply. Leave items that may be needed later blank, such as a second transporter.

Item 1. Enter the generator's U.S. EPA twelve digit identification number. For Part 121 manifested shipments where a generator does not have a U.S. EPA assigned number, a state assigned number must be obtained and used. The generator of the waste must enter a unique five digit manifest document number (e.g. 00001).

Item 2. Page number 1 of 1 should be recorded unless a continuation sheet is used, in which case the total number of pages, counting the initial manifest page, should be shown.

Item 3. Enter the name of the generator and the mailing address to which the manifest should be mailed. If the address of the site at which the waste was placed into transportation is different from the mailing address record the site address in item J.

Item 4. Enter a telephone number (including area code) where an authorized agent of the generator can be reached in the event of an emergency and/or a partial or total rejected load.

NOTE: The 24 hour emergency phone number required for a hazardous materials shipping paper may be different from the generator's phone number.

Item 5. Enter the company name of the first transporter who will transport the waste.

Item 6. Enter the transporter's U.S. EPA twelve digit identification number. For Part 121 manifested shipments where a transporter does not have a U.S. EPA assigned number, a state assigned number is to be used.

Item 7. If using a second transporter, enter the company name.

Item 8. Enter the second transporter's U.S. EPA twelve digit identification number. For Part 121 manifested shipments where a transporter does not have a U.S. EPA assigned number, a state number is to be used.

NOTE: If more than two transporters are used, the generator or third transporter shall initiate a continuation sheet. In Item L of the continuation sheet, the generator/transporter must copy the State manifest document number listed in Item A. Every transport company used between the generator and the designated facility (except for intermediate rail or barge transporters used between the initial rail or barge carriers and the designated facility) must be listed. This is not intended to require multiple signatures for individual drivers working for one transporter. Item 2 is to be changed to reflect the added page(s). Continuation sheets must be appropriately completed in their entirety and properly distributed. Continuation sheets may not be used to list additional waste streams.

Item 9. Enter the company name and site address of the facility designated to receive the waste listed on this manifest.

Item 10. Enter the U.S. EPA twelve digit identification number for the designated facility described in Item 9. For Part 121 manifested shipments where a designated facility does not have a U.S. EPA assigned number, a state assigned number is to be used.

Item 11. Enter an X in the HM box if the waste is a hazardous material regulate by U.S. DOT. (See 49 CFR 172). Enter the required U.S. DOT shipping description, including Proper Shipping Name, Hazard Class or Division, ID Number (UN/NA), and packing group for each waste as identified in 49 CFR 172. Additional information may also be required in this space, including technical name and reportable quantity references. For only Part 121 regulated wastes include an appropriate shipping description for the waste stream.

Item 12. Enter the number of containers for each waste and the appropriate abbreviations listed below for the type of container. Each container type requires separate entry.

DM = Metal drums, barrels, kegs	CY = Cylinders
DW = Wooden drums, barrels, kegs	CM = Metal boxes, cartons, cases (including roll-offs)
DF = Fiberboard or plastic drums, barrels, kegs	CW = Wooden boxes, cartons, cases
DT = Dump truck	CF = Fiber or plastic boxes, cartons, cases
TP = Tanks, portable	BA = Burlap, cloth, paper / plastic bags
TT = Cargo tanks (tank trucks)	
TC = Tank cars	

Item 13. Enter the total quantity of waste described on each line. Do not use decimals or fractions.

Item 14. Enter the appropriate abbreviation for the unit of measure listed below.

G = Gallons (liquids only)	L = Liters (liquids only)
P = Pounds	K = Kilograms
T = Tons (2000 lbs.)	M = Metric tons (1000 kg)
Y = Cubic yards	N = Cubic meters

Item 15. The generator may use this space to indicate special transportation, treatment, storage or disposal information. Import/Export information as noted in the "International Shipment" instructions section is to be recorded here.

Item 16. The generator must read, print his/her name, sign and date the certification statement.

Item 17. Print the name of the person accepting the waste on behalf of the first transporter. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

Item 18. If applicable, print the name of the person accepting the waste on behalf of the second transporter. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

Item 19. An authorized representative of the designated (or alternate) facility must note in this space any discrepancy in the waste shipment.

Item 20. Print the name of the person accepting the waste on behalf of the designated facility. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

NOTE: MDEQ "Rejected Load Procedures" provides guidance for partial or total load rejections.

Only the following information in the shaded area is a State of Michigan requirement:

Item A. A preprinted State manifest document number.

Item B - H. May be required by other states.

Item I. For hazardous wastes, enter the appropriate waste numbers found in R299.9212 through R299.9214 of Part 111 and 40 CFR 261 Subparts C and D. If more than one waste number is required to appropriately identify the waste, enter the additional numbers in Item J. In selecting the most appropriate waste number the following hierarchy must be used: acute waste (including P and acute F), U (toxic), K (specific sources), non-acute E (non-specific sources) and D (characteristic). State regulated wastes follow the same hierarchy as federally regulated wastes. For Part 121 wastes which are not hazardous wastes enter the appropriate code listed below.

Mixed Solvents	007L	Storm Sewer Cleanouts	031L
Pharmaceutical	014L	Sanitary Sewer Cleanouts	032L
Crankcase Oil	017L	X-Ray/Photo Solutions	033L
Coolants and Water Soluble Oils	019L	Water Based Cleaning Solutions	034L
Other Oil (Describe in Item 11 or Item J)	021L	Car Wash Sludges	035L
Brine	022L	Grease Trap Wastes	036L
PCB	026L		
Other Wastes (Describe in Item 11 or Item J)	029L		
Antifreeze	030L		

Item J. Generators are to use this space for the site address if different from the mailing address noted in Item 3, additional waste codes, additional description for a Part 121 waste as noted in Item I of these instructions, approval of commingling authority as required in R299.9304(6).

Item K. List any specific codes which apply.

Burned for Energy Recovery	B
Conditionally Exempt Small Quantity Generator	C
Emergency Response Cleanup	E
Household Generated	H
Recycled Precious Metals	P
Recycled, Reclaimed, Used or Reused	R
Universal Waste	U

INTERNATIONAL SHIPMENTS

Exports- Transporters must sign and enter the date the waste leaves the United States in Item 15. The primary exporter must identify the point of departure from the United States.*

Imports- Shipments of hazardous and Part 121 regulated wastes must be accompanied by a U.S. EPA Uniform Hazardous Waste Manifest. Any person functioning as the U.S. Importer, as defined in Part 111, must complete the manifest as required in R299.9310*

*Transporters of hazardous waste shipments must deliver a copy of the manifest to U.S. Customs when importing or exporting the waste across U.S. borders. Record the foreign waste manifest document number in Item I.

MANIFEST DISTRIBUTION

GENERATOR: Upon placing the waste into transportation (first transporter signs and dates manifest) remove the white and gold banded copies and give the remainder of the manifest copies to the transporter. Sent the white copy to MDEQ no later than the tenth day of the month following the shipment. For shipments of wastes being transported to a designated facility outside of Michigan when an out-of-state manifest is used, mail to the MDEQ a photocopy of the manifest when the shipment is placed into transportation and mail a photocopy of the second generator manifest copy, when received.

TRANSPORTER: Upon delivery to the designated (or alternate) facility, and that facility signs and dates the manifest, the canary banded copy will be returned to you. If more than one transporter is used, the manifest is to be copied and supplied to the previous transporter acknowledging the receipt of the shipment by the next transporter. the canary banded copy stays with the manifest until the shipment reaches the designated facility.

DESIGNATED FACILITY: Upon signing and dating the manifest as received, give the canary banded

ADDRESS ALL MDEQ MANIFEST COPIES TO:
WASTE MANAGEMENT DIVISION
MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
PO BOX 30038
LANSING MI 48909-7538

The public reporting burden for this collection of information is estimated to average 31 minutes for generators, 15 minutes for transporters, and 15 minutes for treatments, storage and disposal facilities. The record-keeping burden per response for this collection of information is estimated to average 8 minutes for generators, 6 minutes for transporters, and 6 minutes for treatment, storage and disposal facilities. The burden associated with reading the regulations is estimated at 1 hour and 15 minutes annually. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency.

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB numbers for EPA's regulations are listed in 40 CFR Part 9 and 48 CFR Chapter 15. Send comments regarding these burden estimates or any other aspect of this collection, including suggestions for reducing the burden, including through use of automated collection techniques to the Director, OPPE Regulatory Information Division, U.S. Environmental Protection Agency (2.37), 401 M St. S.W., Washington, D.C., 20460 and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Attention: Desk Officer for EPA, 725 17th Street, N.W., Washington, D.C. 20503. *Include the OMB control number in any correspondence.

MI0012851

DEQ WASTE MANAGEMENT DIVISION
MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY

DO NOT WRITE IN THIS SPACE
ATT. ☐ DIS. ☐ REJ. ☐ PR. ☐

Required under authority of Part 111 and Part 121 of Act 451, 1994, as amended.

Failure to file may subject you to criminal and/or civil penalties under Sections 324.11151 or 324.12116 MCL.

Please print or type.

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. MID005354300
Manifest Document No.
2. Page 1 of 1
Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
WOLVERINE BASKET & MFG.
2039 PRINCESS
INKSTER, MI 48141
4. Generator's Phone (517) 610-1130 DOUG ROMMECK

A. State Manifest Document Number MI 9757376
B. State Generator's ID

5. Transporter 1 Company Name
6. US EPA ID Number MIR000035701
C. State Transporter's ID
D. Transporter's Phone

7. Transporter 2 Company Name
8. US EPA ID Number
E. State Transporter's ID
F. Transporter's Phone

9. Designated Facility Name and Site Address
MICHIGAN DISPOSAL WASTE TREATMENT PLANT
49350 NORTH I94 SERVICE DRIVE
BELLEVILLE, MICHIGAN 48111
10. US EPA ID Number MID000724831
G. State Facility's ID
H. Facility's Phone 800-592-5489

	11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID NUMBER) HM		12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	☐	NON RCRA/NON DOT REGULATED SOLIDS	001	DT		P	SLUD
b.	☐						
c.	☐						
d.	☐						

J. Additional Descriptions for Materials Listed Above
APPROVAL# 11A 101904TBB (CONTAMINATED SOIL)

K. Handling Codes
a
b
c
d

15. Special Handling Instructions and Additional Information

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: Douglas Rommeck
Signature: [signature]
Date: Month 10 Day 07 Year 04

17. Transporter 1 Acknowledgment of Receipt of Materials
Printed/Typed Name: [illegible]
Signature: [signature]
Date: Month 10 Day 07 Year 04

18 Transporter 2 Acknowledgment of Receipt of Materials
Printed/Typed Name
Signature
Date: Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name
Signature
Date: Month Day Year

GENERATOR / TRANSPORTER / FACILITY

ALL SPILLS MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHIGAN AT 1-800-292-4706 OR OUT OF STATE AT 517-373-7660 AND THE NATIONAL RESPONSE CENTER AT 1-800-424-8802 24 HOUR PER DAY.

EPA Form 8700-22 (Rev. 9/88)

GENERATOR 1st COPY

EQP 5110 Rev. 7/03

MI0012852

GENERAL INSTRUCTIONS

Read all instructions before completing this form. This form has been designed for use on a 12-pitch (elite) typewriter/computer printer; a firm point pen may also be used - press down hard. Ensure all copies are legible.

Federal and state regulations require generators and transporters of hazardous waste and owners or operators of hazardous waste treatment, storage, and disposal facilities to use this form (8700-22) and, if necessary, the continuation sheet (Form 8700-22A) for both inter- and intrastate transportation of hazardous waste as defined in 40 CFR and Part 111 of Act 451 of 1994, as amended (Part 111). State regulations also require the use of this manifest for all regulated shipments of liquid industrial waste as required in Part 121 of Act 451 of 1994, as amended (Part 121).

Federal and State regulations provide for additional requirements, not included in these instructions, regarding the use and management of this form (40 CFR, 49 CFR, Part 111, Part 121).

Additional information such as "Rejected Load Procedures", state assigned identification numbers, manifest forms, etc., can be obtained by contacting the Michigan Department of Environmental Quality (MDEQ), Waste Management Divisions (WMD) Internet Home Page at http://www.deq.state.mi.us/wmd or you may contact the Manifest Unit directly at (517) 373-1217. Continuation sheets are not supplied by MDEQ.

Complete all items on the manifest. Enter "N/A" if any item does not apply. Leave items that may be needed later blank, such as a second transporter.

Item 1. Enter the generator's U.S. EPA twelve digit identification number. For Part 121 manifested shipments where a generator does not have a U.S. EPA assigned number, a state assigned number must be obtained and used. The generator of the waste must enter a unique five digit manifest document number (e.g. 00001).

Item 2. Page number 1 of 1 should be recorded unless a continuation sheet is used, in which case the total number of pages, counting the initial manifest page, should be shown.

Item 3. Enter the name of the generator and the mailing address to which the manifest should be mailed. If the address of the site at which the waste was placed into transportation is different from the mailing address record the site address in item J.

Item 4. Enter a telephone number (including area code) where an authorized agent of the generator can be reached in the event of an emergency and/or a partial or total rejected load.

NOTE: The 24 hour emergency phone number required for a hazardous materials shipping paper may be different from the generator's phone number.

Item 5. Enter the company name of the first transporter who will transport the waste.

Item 6. Enter the transporter's U.S. EPA twelve digit identification number. For Part 121 manifested shipments where a transporter does not have a U.S. EPA assigned number, a state assigned number is to be used.

Item 7. If using a second transporter, enter the company name.

Item 8. Enter the second transporter's U.S. EPA twelve digit identification number. For Part 121 manifested shipments where a transporter does not have a U.S. EPA assigned number, a state number is to be used.

NOTE: If more than two transporters are used, the generator or third transporter shall initiate a continuation sheet. In Item L of the continuation sheet, the generator/transporter must copy the State manifest document number listed in Item A. Every transport company used between the generator and the designated facility (except for intermediate rail or barge transporters used between the initial rail or barge carriers and the designated facility) must be listed. This is not intended to require multiple signatures for individual drivers working for one transporter. Item 2 is to be changed to reflect the added page(s). Continuation sheets must be appropriately completed in their entirety and properly distributed. Continuation sheets may not be used to list additional waste streams.

Item 9. Enter the company name and site address of the facility designated to receive the waste listed on this manifest.

Item 10. Enter the U.S. EPA twelve digit identification number for the designated facility described in Item 9. For Part 121 manifested shipments where a designated facility does not have a U.S. EPA assigned number, a state assigned number is to be used.

Item 11. Enter an X in the HM box if the waste is a hazardous material regulate by U.S. DOT (See 49 CFR 172). Enter the required U.S. DOT shipping description, including Proper Shipping Name, Hazard Class or Division, ID Number (UN/NA), and packing group for each waste as identified in 49 CFR 172. Additional information may also be required in this space, including technical name and reportable quantity references. For only Part 121 regulated wastes include an appropriate shipping description for the waste stream.

Item 12. Enter the number of containers for each waste and the appropriate abbreviations listed below for the type of container. Each container type requires separate entry.

DM = Metal drums, barrels, kegs	CY = Cylinders
DW = Wooden drums, barrels, kegs	CM = Metal boxes, cartons, cases (including roll-offs)
DF = Fiberboard or plastic drums, barrels, kegs	CW = Wooden boxes, cartons, cases
DT = Dump truck	CF = Fiber or plastic boxes, cartons, cases
TP = Tanks, portable	BA = Burlap, cloth, paper / plastic bags
TT = Cargo tanks (tank trucks)	
TC = Tank cars	

Item 13. Enter the total quantity of waste described on each line. Do not use decimals or fractions.

Item 14. Enter the appropriate abbreviation for the unit of measure listed below.

G = Gallons (liquids only)	L = Liters (liquids only)
P = Pounds	K = Kilograms
T = Tons (2000 lbs.)	M = Metric tons (1000 kg)
Y = Cubic yards	N = Cubic meters

Item 15. The generator may use this space to indicate special transportation, treatment, storage or disposal information. Import/Export information as noted in the "International Shipment" instructions section is to be recorded here.

Item 16. The generator must read, print his/her name, sign and date the certification statement.

Item 17. Print the name of the person accepting the waste on behalf of the first transporter. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

Item 18. If applicable, print the name of the person accepting the waste on behalf of the second transporter. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

Item 19. An authorized representative of the designated (or alternate) facility must note in this space any discrepancy in the waste shipment.

Item 20. Print the name of the person accepting the waste on behalf of the designated facility. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

NOTE: MDEQ "Rejected Load Procedures" provides guidance for partial or total load rejections.

Only the following information in the shaded area is a State of Michigan requirement:

Item A. A preprinted State manifest document number.

Item B - H. May be required by other states.

Item I. For hazardous wastes, enter the appropriate waste numbers found in R299.9212 through R299.9214 of Part 111 and 40 CFR 261 Subparts C and D. If more than one waste number is required to appropriately identify the waste, enter the additional numbers in item J. In selecting the most appropriate waste number the following hierarchy must be used: acute waste (including P and acute F), U (toxic), K (specific sources), non-acute F (non-specific sources) and D (characteristic). State regulated wastes follow the same hierarchy as federally regulated wastes. For Part 121 wastes which are not hazardous wastes enter the appropriate code listed below.

Mixed Solvents	007L	Storm Sewer Cleanouts	031L
Pharmaceutical	014L	Sanitary Sewer Cleanouts	032L
Crankcase Oil	017L	X-Ray/Photo Solutions	033L
Coolants and Water Soluble Oils	019L	Water Based Cleaning Solutions	034L
Other Oil (Describe in Item 11 or Item J)	021L	Car Wash Sludges	035L
Brine	022L	Grease Trap Wastes	036L
PCB	026L		
Other Wastes (Describe in Item 11 or Item J)	029L		
Antifreeze	030L		

Item J. Generators are to use this space for the site address if different from the mailing address noted in Item 3, additional waste codes, additional description for a Part 121 waste as noted in Item I of these instructions, approval of commingling authority as required in R299.9304(6).

Item K. List any specific codes which apply.

Burned for Energy Recovery	B
Conditionally Exempt Small Quantity Generator	C
Emergency Response Cleanup	E
Household Generated	H
Recycled Precious Metals	P
Recycled, Reclaimed, Used or Reused	R
Universal Waste	U

INTERNATIONAL SHIPMENTS

Exports- Transporters must sign and enter the date the waste leaves the United States in Item 15. The primary exporter must identify the point of departure from the United States.*

Imports- Shipments of hazardous and Part 121 regulated wastes must be accompanied by a U.S. EPA Uniform Hazardous Waste Manifest. Any person functioning as the U.S. Importer, as defined in Part 111, must complete the manifest as required in R299.9310*

*Transporters of hazardous waste shipments must deliver a copy of the manifest to U.S. Customs when importing or exporting the waste across U.S. borders. Record the foreign waste manifest document number in Item J.

MANIFEST DISTRIBUTION

GENERATOR: Upon placing the waste into transportation (first transporter signs and dates manifest) remove the white and gold banded copies and give the remainder of the manifest copies to the transporter. Sent the white copy to MDEQ no later than the tenth day of the month following the shipment. For shipments of wastes being transported to a designated facility outside of Michigan when an out-of-state manifest is used, mail to the MDEQ a photocopy of the manifest when the shipment is placed into transportation and mail a photocopy of the second generator manifest copy, when received.

TRANSPORTER: Upon delivery to the designated (or alternate) facility, and that facility signs and dates the manifest, the canary banded copy will be returned to you. If more than one transporter is used, the manifest is to be copied and supplied to the previous transporter acknowledging the receipt of the shipment by the next transporter. the canary banded copy stays with the manifest until the shipment reaches the designated facility.

DESIGNATED FACILITY: Upon signing and dating the manifest as received, give the canary banded

ADDRESS ALL MDEQ MANIFEST COPIES TO:
WASTE MANAGEMENT DIVISION
MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
PO BOX 30038
LANSING MI 48909-7538

The public reporting burden for this collection of information is estimated to average 31 minutes for generators, 16 minutes for transporters, and 16 minutes for treatment, storage and disposal facilities. The record-keeping burden per response for this collection of information is estimated to average 6 minutes for generators, 6 minutes for transporters, and 6 minutes for treatment, storage and disposal facilities. The burden associated with reading the regulations is estimated at 1 hour and 15 minutes annually. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency.

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB numbers for EPA's regulations are listed in 40 CFR Part 9 and 48 CFR Chapter 15. Send comments regarding these burden estimates or any other aspect of this collection, including suggestions for reducing the burden, including through use of automated collection techniques to the Director, OPPE Regulatory Information Division, U.S. Environmental Protection Agency (2 37), 401 M St., S.W., Washington, D.C., 20460 and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Attention: Desk Officer for EPA, 725 17th Street, N.W., Washington, D.C. 20503. Include the OMB control number in any correspondence.

MI0012854

CERTIFICATE OF DISPOSAL

This certificate is to verify the wastes specified on Manifest # MI19753376

have been properly disposed of in accordance with all local, state and federal regulations.

"Disposed of" means either: 1) Burial or 2) Processed as specified in 40 CFR et seq.

FACILITY NAME:
(Please check one)

☑ Michigan Disposal Waste Treatment Plant
(EPA I.D. # MID000724831)

☐ Wayne Disposal, Inc.
(EPA I.D. # MID048090633)

ADDRESS: 49350 N. I-94 Service Drive
Belleville, Michigan 48111

PHONE NUMBER: 1-800-592-5489

FAX NUMBER: 1-800-592-5329

Authorized Signature: _____

THE ENVIRONMENTAL QUALITY COMPANY 49350 N. I-94 SERVICE DRIVE BELLEVILLE MICHIGAN 48111

FORM1020 (3/96)

WASTE MANAGEMENT DIVISION
MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY

DO NOT WRITE IN THIS SPACE
ATT. ☐ DIS. ☐ REJ. ☐ PR. ☐

Required under authority of Part 111 and Part 121 of Act 451, 1994, as amended.

Failure to file may subject you to criminal and/or civil penalties under Sections 324.11151 or 324.12116 MCL.

Please print or type.

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. MID005354398

Manifest Document No.

2. Page 1 of 1

Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
WOLVERINE GASKET & MFG
2038 PRINCESS
INKSTER, MI 48141

DEC 13 2004

4. Generator's Phone (517) 610-1138 DOUG ROMMECK

A. State Manifest Document Number MI 9757377

B. State Generator's ID

5. Transporter 1 Company Name S&C

6. US EPA ID Number MIR000039701

C. State Transporter's ID

D. Transporter's Phone 734-206-6909

7. Transporter 2 Company Name

8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address
MICHIGAN DISPOSAL WASTE TREATMENT PLANT
49350 NORTH I94 SERVICE DRIVE
BELLEVILLE, MICHIGAN 48111

10. US EPA ID Number MID000724831

G. State Facility's ID

H. Facility's Phone 800-592-5489

	11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID NUMBER).	HM	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	NON RCRA/NON DOT REGULATED SOLIDS	☐	001	DT	[illegible]	P	SLUD
b.		☐					
c.		☐					
d.		☐					

J. Additional Descriptions for Materials Listed Above
APPROVAL# 11A 101904TBD (CONTAMINATED SOIL)

K. Handling Codes
a
b
c
d

15. Special Handling Instructions and Additional Information

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR; if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

GENERATOR

Printed/Typed Name: Douglas Rommeck
Signature: [signature]
Date (Month Day Year): 10 27 04

TRANSPORTER

17. Transporter 1 Acknowledgment of Receipt of Materials
Printed/Typed Name: [illegible]
Signature: [signature]
Date (Month Day Year): 10 27 04

18 Transporter 2 Acknowledgment of Receipt of Materials
Printed/Typed Name
Signature
Date (Month Day Year)

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: [illegible]
Signature: [signature]
Date (Month Day Year): [illegible]

ALL SPILLS MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHIGAN AT 1-800-292-4706 OR OUT OF STATE AT 517-373-7660 AND THE NATIONAL RESPONSE CENTER AT 1-800-424-8802 24 HOUR PER DAY.

GENERAL INSTRUCTIONS

Read all instructions before completing this form. This form has been designed for use on a 12-pitch (elite) typewriter/computer printer: a firm point pen may also be used - press down hard. Ensure all copies are legible.

Federal and state regulations require generators and transporters of hazardous waste and owners or operators of hazardous waste treatment, storage, and disposal facilities to use this form (8700-22) and, if necessary, the continuation sheet (Form 8700-22A) for both inter- and intrastate transportation of hazardous waste as defined in 40 CFR and Part 111 of Act 451 of 1994, as amended (Part 111). State regulations also require the use of this manifest for all regulated shipments of liquid industrial waste as required in Part 121 of Act 451 of 1994, as amended (Part 121).

Federal and State regulations provide for additional requirements, not included in these instructions, regarding the use and management of this form (40 CFR, 49 CFR, Part 111, Part 121).

Additional information such as "Rejected Load Procedures", state assigned identification numbers, manifest forms, etc., can be obtained by contacting the Michigan Department of Environmental Quality (MDEQ), Waste Management Divisions (WMD) Internet Home Page at http://www.deq.state.mi.us/wmd or you may contact the Manifest Unit directly at (517) 373-1217. Continuation sheets are not supplied by MDEQ.

Complete all items on the manifest. Enter "N/A" if any item does not apply. Leave items that may be needed later blank, such as a second transporter.

Item 1. Enter the generator's U.S. EPA twelve digit identification number. For Part 121 manifested shipments where a generator does not have a U.S. EPA assigned number, a state assigned number must be obtained and used. The generator of the waste must enter a unique five digit manifest document number (e.g. 00001).

Item 2. Page number 1 of 1 should be recorded unless a continuation sheet is used, in which case the total number of pages, counting the initial manifest page, should be shown.

Item 3. Enter the name of the generator and the mailing address to which the manifest should be mailed. If the address of the site at which the waste was placed into transportation is different from the mailing address record the site address in Item J.

Item 4. Enter a telephone number (including area code) where an authorized agent of the generator can be reached in the event of an emergency and/or a partial or total rejected load.

NOTE: The 24 hour emergency phone number required for a hazardous materials shipping paper may be different from the generator's phone number.

Item 5. Enter the company name of the first transporter who will transport the waste.

Item 6. Enter the transporter's U.S. EPA twelve digit identification number. For Part 121 manifested shipments where a transporter does not have a U.S. EPA assigned number, a state assigned number is to be used.

Item 7. If using a second transporter, enter the company name.

Item 8. Enter the second transporter's U.S. EPA twelve digit identification number. For Part 121 manifested shipments where a transporter does not have a U.S. EPA assigned number, a state number is to be used.

NOTE: If more than two transporters are used, the generator or third transporter shall initiate a continuation sheet. In Item L of the continuation sheet, the generator/transporter must copy the State manifest document number listed in Item A. Every transport company used between the generator and the designated facility (except for intermediate rail or barge transporters used between the initial rail or barge carriers and the designated facility) must be listed. This is not intended to require multiple signatures for individual drivers working for one transporter. Item 2 is to be changed to reflect the added page(s). Continuation sheets must be appropriately completed in their entirety and properly distributed. Continuation sheets may not be used to list additional waste streams.

Item 9. Enter the company name and site address of the facility designated to receive the waste listed on this manifest.

Item 10. Enter the U.S. EPA twelve digit identification number for the designated facility described in Item 9. For Part 121 manifested shipments where a designated facility does not have a U.S. EPA assigned number, a state assigned number is to be used.

Item 11. Enter an X in the HM box if the waste is a hazardous material regulate by U.S. DOT (See 49 CFR 172). Enter the required U.S. DOT shipping description, including Proper Shipping Name, Hazard Class or Division, ID Number (UN/NA), and packing group for each waste as identified in 49 CFR 172. Additional information may also be required in this space, including technical name and reportable quantity references. For only Part 121 regulated wastes include an appropriate shipping description for the waste stream.

Item 12. Enter the number of containers for each waste and the appropriate abbreviations listed below for the type of container. Each container type requires separate entry.

DM = Metal drums, barrels, kegs	CY = Cylinders
DW = Wooden drums, barrels, kegs	CM = Metal boxes, cartons, cases (including roll-offs)
DF = Fiberboard or plastic drums, barrels, kegs	CW = Wooden boxes, cartons, cases
DT = Dump truck	CF = Fiber or plastic boxes, cartons, cases
TP = Tanks, portable	BA = Burlap, cloth, paper / plastic bags
TT = Cargo tanks (tank trucks)	
TC = Tank cars	

Item 13. Enter the total quantity of waste described on each line. Do not use decimals or fractions.

Item 14. Enter the appropriate abbreviation for the unit of measure listed below.

G = Gallons (liquids only)	L = Liters (liquids only)
P = Pounds	K = Kilograms
T = Tons (2000 lbs.)	M = Metric tons (1000 kg)
Y = Cubic yards	N = Cubic meters

Item 15. The generator may use this space to indicate special transportation, treatment, storage or disposal information. Import/Export information as noted in the "International Shipment" instructions section is to be recorded here.

Item 16. The generator must read, print his/her name, sign and date the certification statement.

Item 17. Print the name of the person accepting the waste on behalf of the first transporter. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

Item 18. If applicable, print the name of the person accepting the waste on behalf of the second transporter. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

Item 19. An authorized representative of the designated (or alternate) facility must note in this space any discrepancy in the waste shipment.

Item 20. Print the name of the person accepting the waste on behalf of the designated facility. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

NOTE: MDEQ "Rejected Load Procedures" provides guidance for partial or total load rejections.

Only the following information in the shaded area is a State of Michigan requirement:

Item A. A preprinted State manifest document number.

Item B - H. May be required by other states.

Item I. For hazardous wastes, enter the appropriate waste numbers found in R299.9212 through R299.9214 of Part 111 and 40 CFR 261 Subparts C and D. If more than one waste number is required to appropriately identify the waste, enter the additional numbers in item J. In selecting the most appropriate waste number the following hierarchy must be used: acute waste (including P and acute F), U (toxic), K (specific sources), non-acute F (non-specific sources) and D (characteristic). State regulated wastes follow the same hierarchy as federally regulated wastes. For Part 121 wastes which are not hazardous wastes enter the appropriate code listed below.

Mixed Solvents	007L	Storm Sewer Cleanouts	031L
Pharmaceutical	014L	Sanitary Sewer Cleanouts	032L
Crankcase Oil	017L	X-Ray/Photo Solutions	033L
Coolants and Water Soluble Oils	019L	Water Based Cleaning Solutions	034L
Other Oil (Describe in Item 11 or Item J)	021L	Car Wash Sludges	035L
Brine	022L	Grease Trap Wastes	036L
PCB	026L		
Other Wastes (Describe in Item 11 or Item J)	029L		
Antifreeze	030L		

Item J. Generators are to use this space for the site address if different from the mailing address noted in Item 3, additional waste codes, additional description for a Part 121 waste as noted in Item I of these instructions, approval of commingling authority as required in R299.9304(6).

Item K. List any specific codes which apply.

Burned for Energy Recovery	B
Conditionally Exempt Small Quantity Generator	C
Emergency Response Cleanup	E
Household Generated	H
Recycled Precious Metals	P
Recycled, Reclaimed, Used or Reused	R
Universal Waste	U

INTERNATIONAL SHIPMENTS

Exports- Transporters must sign and enter the date the waste leaves the United States in Item 15. The primary exporter must identify the point of departure from the United States.*

Imports- Shipments of hazardous and Part 121 regulated wastes must be accompanied by a U.S. EPA Uniform Hazardous Waste Manifest. Any person functioning as the U.S. Importer, as defined in Part 111, must complete the manifest as required in R299.9310*

Transporters of hazardous waste shipments must deliver a copy of the manifest to U.S. Customs when importing or exporting the waste across U.S. borders. Record the foreign waste manifest document number in Item J.

MANIFEST DISTRIBUTION

GENERATOR: Upon placing the waste into transportation (first transporter signs and dates manifest) remove the white and gold banded copies and give the remainder of the manifest copies to the transporter. Sent the white copy to MDEQ no later than the tenth day of the month following the shipment. For shipments of wastes being transported to a designated facility outside of Michigan when an out-of-state manifest is used, mail to the MDEQ a photocopy of the manifest when the shipment is placed into transportation and mail a photocopy of the second generator manifest copy, when received.

TRANSPORTER: Upon delivery to the designated (or alternate) facility, and that facility signs and dates the manifest, the canary banded copy will be returned to you. If more than one transporter is used, the manifest is to be copied and supplied to the previous transporter acknowledging the receipt of the shipment by the next transporter. the canary banded copy stays with the manifest until the shipment reaches the designated facility.

DESIGNATED FACILITY: Upon signing and dating the manifest as received, give the canary banded

ADDRESS ALL MDEQ MANIFEST COPIES TO:
WASTE MANAGEMENT DIVISION
MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
PO BOX 30038
LANSING MI 48909-7538

The public reporting burden for this collection of information is estimated to average 31 minutes for generators, 18 minutes for transporters, and 18 minutes for treatments, storage and disposal facilities. The record-keeping burden per response for this collection of information is estimated to average 6 minutes for generators, 6 minutes for transporters, and 6 minutes for treatment, storage and disposal facilities. The burden associated with reading the regulations is estimated at 1 hour and 15 minutes annually. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency.

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB numbers for EPA's regulations are listed in 40 CFR Part 9 and 48 CFR Chapter 15. Send comments regarding these burden statements or any other aspect of this collection, including suggestions for reducing the burden, including through use of automated collection techniques to the Director, OPPE Regulatory Information Division, U.S. Environmental Protection Agency (2.37), 401 M St., S.W., Washington, D.C., 20460 and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Attention: Desk Officer for EPA, 725 17th Street, N.W., Washington, D.C. 20503. Include the OMB control number in any correspondence.

MI0012856

WASTE MANAGEMENT DIVISION
MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY

DO NOT WRITE IN THIS SPACE
ATT. ☐ DIS. ☐ REJ. ☐ PR. ☐

Required under authority of Part 111 and Part 121 of Act 451, 1994, as amended.

Failure to file may subject you to criminal and/or civil penalties under Sections 324.11151 or 324.12116 MCL.

Please print or type.

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. MID005354300
Manifest Document No.
2. Page 1 of 1
Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
WOLVERINE GASKET & MFG
2330 PRINCESS
INKSTER, MI 48141
4. Generator's Phone ( )517 610-1138 DOUG ROMMECK

A. State Manifest Document Number MI 9757377
B. State Generator's ID

5. Transporter 1 Company Name S&C
6. US EPA ID Number MIR000039701
C. State Transporter's ID
D. Transporter's Phone 734.208.6500

7. Transporter 2 Company Name
8. US EPA ID Number
E. State Transporter's ID
F. Transporter's Phone

9. Designated Facility Name and Site Address
MICHIGAN DISPOSAL WASTE TREATMENT PLANT
40950 NORTH I94 SERVICE DRIVE
BELLEVILLE, MICHIGAN 48111
10. US EPA ID Number MID000724831
G. State Facility's ID
H. Facility's Phone 800-592-5489

	11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID NUMBER)	HM	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	NON RCRA/NON DOT REGULATED SOLIDS	☐	001	DT	[illegible]	P	SLUD
b.		☐					
c.		☐					
d.		☐					

J. Additional Descriptions for Materials Listed Above
APPROVAL# 11A 101904TEB (CONTAMINATED SOIL)

K. Handling Codes
a
b
c
d

15. Special Handling Instructions and Additional Information

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: Douglas Rommeck
Signature:
Date: Month 10 Day 3 Year 04

17. Transporter 1 Acknowledgment of Receipt of Materials
Printed/Typed Name: [illegible]
Signature:
Date: Month [illegible] Day [illegible] Year [illegible]

18 Transporter 2 Acknowledgment of Receipt of Materials
Printed/Typed Name
Signature
Date: Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: [illegible]
Signature:
Date: Month [illegible] Day [illegible] Year [illegible]

GENERATOR
TRANSPORTER
FACILITY

ALL SPILLS MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHIGAN AT 1-800-292-4706 OR OUT OF STATE AT 517-373-7660 AND THE NATIONAL RESPONSE CENTER AT 1-800-424-8802 24 HOUR PER DAY.

EPA Form 8700-22 (Rev. 9/88)
GENERATOR 1st COPY
EQP 5110 Rev. 7/03

MI0012857

GENERAL INSTRUCTIONS

Read all instructions before completing this form. This form has been designed for use on a 12-pitch (elite) typewriter/computer printer: a firm point pen may also be used - press down hard. Ensure all copies are legible.

Federal and state regulations require generators and transporters of hazardous waste and owners or operators of hazardous waste treatment, storage, and disposal facilities to use this form (8700-22) and, if necessary, the continuation sheet (Form 8700-22A) for both inter- and intrastate transportation of hazardous waste as defined in 40 CFR and Part 111 of Act 451 of 1994, as amended (Part 111). State regulations also require the use of this manifest for all regulated shipments of liquid industrial waste as required in Part 121 of Act 451 of 1994, as amended (Part 121).

Federal and State regulations provide for additional requirements, not included in these instructions, regarding the use and management of this form (40 CFR, 49 CFR, Part 111, Part 121).

Additional information such as "Rejected Load Procedures", state assigned identification numbers, manifest forms, etc., can be obtained by contacting the Michigan Department of Environmental Quality (MDEQ), Waste Management Divisions (WMD) Internet Home Page at http://www.deq.state.mi.us/wmd or you may contact the Manifest Unit directly at (517) 373-1217. Continuation sheets are not supplied by MDEQ.

Complete all items on the manifest. Enter "N/A" if any item does not apply. Leave items that may be needed later blank, such as a second transporter.

Item 1. Enter the generator's U.S. EPA twelve digit identification number. For Part 121 manifested shipments where a generator does not have a U.S. EPA assigned number, a state assigned number must be obtained and used. The generator of the waste must enter a unique five digit manifest document number (e.g. 00001).

Item 2. Page number 1 of 1 should be recorded unless a continuation sheet is used, in which case the total number of pages, counting the initial manifest page, should be shown.

Item 3. Enter the name of the generator and the mailing address to which the manifest should be mailed. If the address of the site at which the waste was placed into transportation is different from the mailing address record the site address in Item J.

Item 4. Enter a telephone number (including area code) where an authorized agent of the generator can be reached in the event of an emergency and/or a partial or total rejected load.

NOTE: The 24 hour emergency phone number required for a hazardous materials shipping paper may be different from the generator's phone number.

Item 5. Enter the company name of the first transporter who will transport the waste.

Item 6. Enter the transporter's U.S. EPA twelve digit identification number. For Part 121 manifested shipments where a transporter does not have a U.S. EPA assigned number, a state assigned number is to be used.

Item 7. If using a second transporter, enter the company name.

Item 8. Enter the second transporter's U.S. EPA twelve digit identification number. For Part 121 manifested shipments where a transporter does not have a U.S. EPA assigned number, a state number is to be used.

NOTE: If more than two transporters are used, the generator or third transporter shall initiate a continuation sheet. In Item L of the continuation sheet, the generator/transporter must copy the State manifest document number listed in Item A. Every transport company used between the generator and the designated facility (except for intermediate rail or barge transporters used between the initial rail or barge carriers and the designated facility) must be listed. This is not intended to require multiple signatures for individual drivers working for one transporter. Item 2 is to be changed to reflect the added page(s). Continuation sheets must be appropriately completed in their entirety and properly distributed. Continuation sheets may not be used to list additional waste streams.

Item 9. Enter the company name and site address of the facility designated to receive the waste listed on this manifest.

Item 10. Enter the U.S. EPA twelve digit identification number for the designated facility described in Item 9. For Part 121 manifested shipments where a designated facility does not have a U.S. EPA assigned number, a state assigned number is to be used.

Item 11. Enter an X in the HM box if the waste is a hazardous material regulate by U.S. DOT (See 49 CFR 172). Enter the required U.S. DOT shipping description, including Proper Shipping Name, Hazard Class or Division, ID Number (UN/NA), and packing group for each waste as identified in 49 CFR 172. Additional information may also be required in this space, including technical name and reportable quantity references. For only Part 121 regulated wastes include an appropriate shipping description for the waste stream.

Item 12. Enter the number of containers for each waste and the appropriate abbreviations listed below for the type of container. Each container type requires separate entry.

DM = Metal drums, barrels, kegs	CY = Cylinders
DW = Wooden drums, barrels, kegs	CM = Metal boxes, cartons, cases (including roll-offs)
DF = Fiberboard or plastic drums, barrels, kegs	CW = Wooden boxes, cartons, cases
DT = Dump truck	CF = Fiber or plastic boxes, cartons, cases
TP = Tanks, portable	BA = Burlap, cloth, paper / plastic bags
TT = Cargo tanks (tank trucks)	
TC = Tank cars	

Item 13. Enter the total quantity of waste described on each line. Do not use decimals or fractions.

Item 14. Enter the appropriate abbreviation for the unit of measure listed below.

G = Gallons (liquids only)	L = Liters (liquids only)
P = Pounds	K = Kilograms
T = Tons (2000 lbs.)	M = Metric tons (1000 kg)
Y = Cubic yards	N = Cubic meters

Item 15. The generator may use this space to indicate special transportation, treatment, storage or disposal information. Import/Export information as noted in the "International Shipment" instructions section is to be recorded here.

Item 16. The generator must read, print his/her name, sign and date the certification statement.

Item 17. Print the name of the person accepting the waste on behalf of the first transporter. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

Item 18. If applicable, print the name of the person accepting the waste on behalf of the second transporter. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

Item 19. An authorized representative of the designated (or alternate) facility must note in this space any discrepancy in the waste shipment.

Item 20. Print the name of the person accepting the waste on behalf of the designated facility. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

NOTE: MDEQ "Rejected Load Procedures" provides guidance for partial or total load rejections.

Only the following information in the shaded area is a State of Michigan requirement:

Item A. A preprinted State manifest document number.

Item B - H. May be required by other states.

Item I. For hazardous wastes, enter the appropriate waste numbers found in R299.9212 through R299.9214 of Part 111 and 40 CFR 261 Subparts C and D. If more than one waste number is required to appropriately identify the waste, enter the additional numbers in item J. In selecting the most appropriate waste number the following hierarchy must be used: acute waste (including P and acute F), U (toxic), K (specific sources), non-acute F (non-specific sources) and D (characteristic). State regulated wastes follow the same hierarchy as federally regulated wastes. For Part 121 wastes which are not hazardous wastes enter the appropriate code listed below.

Mixed Solvents	007L	Storm Sewer Cleanouts	031L
Pharmaceutical	014L	Sanitary Sewer Cleanouts	032L
Crankcase Oil	017L	X-Ray/Photo Solutions	033L
Coolants and Water Soluble Oils	019L	Water Based Cleaning Solutions	034L
Other Oil (Describe in Item 11 or Item J)	021L	Car Wash Sludges	035L
Brine	022L	Grease Trap Wastes	036L
PCB	026L		
Other Wastes (Describe in Item 11 or Item J)	029L		
Antifreeze	030L		

Item J. Generators are to use this space for the site address if different from the mailing address noted in Item 3, additional waste codes, additional description for a Part 121 waste as noted in Item I of these instructions, approval of commingling authority as required in R299.9304(6).

Item K. List any specific codes which apply.

Burned for Energy Recovery	B
Conditionally Exempt Small Quantity Generator	C
Emergency Response Cleanup	E
Household Generated	H
Recycled Precious Metals	P
Recycled, Reclaimed, Used or Reused	R
Universal Waste	U

INTERNATIONAL SHIPMENTS

Exports- Transporters must sign and enter the date the waste leaves the United States in Item 15. The primary exporter must identify the point of departure from the United States.*

Imports- Shipments of hazardous and Part 121 regulated wastes must be accompanied by a U.S. EPA Uniform Hazardous Waste Manifest. Any person functioning as the U.S. Importer, as defined in Part 111, must complete the manifest as required in R299.9310*

*Transporters of hazardous waste shipments must deliver a copy of the manifest to U.S. Customs when importing or exporting the waste across U.S. borders. Record the foreign waste manifest document number in Item J.

MANIFEST DISTRIBUTION

GENERATOR: Upon placing the waste into transportation (first transporter signs and dates manifest) remove the white and gold banded copies and give the remainder of the manifest copies to the transporter. Sent the white copy to MDEQ no later than the tenth day of the month following the shipment. For shipments of wastes being transported to a designated facility outside of Michigan when an out-of-state manifest is used, mail to the MDEQ a photocopy of the manifest when the shipment is placed into transportation and mail a photocopy of the second generator manifest copy, when received.

TRANSPORTER: Upon delivery to the designated (or alternate) facility, and that facility signs and dates the manifest, the canary banded copy will be returned to you. If more than one transporter is used, the manifest is to be copied and supplied to the previous transporter acknowledging the receipt of the shipment by the next transporter. The canary banded copy stays with the manifest until the shipment reaches the designated facility.

DESIGNATED FACILITY: Upon signing and dating the manifest as received, give the canary banded

ADDRESS ALL MDEQ MANIFEST COPIES TO:
WASTE MANAGEMENT DIVISION
MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
PO BOX 30038
LANSING MI 48909-7538

The public reporting burden for this collection of information is estimated to average 31 minutes for generators, 18 minutes for transporters, and 18 minutes for treatments, storage and disposal facilities. The record-keeping burden per response for this collection of information is estimated to average 6 minutes for generators, 6 minutes for transporters, and 6 minutes for treatment, storage and disposal facilities. The burden associated with reading the regulations is estimated at 1 hour and 15 minutes annually. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency.

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB numbers for EPA's regulations are listed in 40 CFR Part 9 and 48 CFR Chapter 15. Send comments regarding these burden statements or any other aspect of this collection, including suggestions for reducing the burden, including through use of automated collection techniques to the Director, OPPE Regulatory Information Division, U.S. Environmental Protection Agency (2.37), 401 M St., S.W., Washington, D.C., 20460 and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Attention: Desk Officer for EPA, 725 17th Street, N.W., Washington, D.C. 20503. Include the OMB control number in any correspondence.

MI0012859

CERTIFICATE OF DISPOSAL

This certificate is to verify the wastes specified on Manifest # MU9757377

have been properly disposed of in accordance with all local, state and federal regulations.

"Disposed of" means either: 1) Burial or 2) Processed as specified in 40 CFR et seq.

FACILITY NAME: *(Please check one)*

☒ Michigan Disposal Waste Treatment Plant (EPA I.D. # MID000724831)

☐ Wayne Disposal, Inc. (EPA I.D. # MID048090633)

ADDRESS: 49350 N. I-94 Service Drive
Belleville, Michigan 48111

PHONE NUMBER: 1-800-592-5489

FAX NUMBER: 1-800-592-5329

Authorized Signature: _____

THE ENVIRONMENTAL QUALITY COMPANY 49350 N. I-94 SERVICE DRIVE BELLEVILLE MICHIGAN 48111

FORM1020 (3/96)

WASTE MANAGEMENT DIVISION
MICHIGAN DEPARTMENT OF
ENVIRONMENTAL QUALITY

DO NOT WRITE IN THIS SPACE
ATT. ☐ DIS. ☐ REJ. ☐ PR. ☐

Required under authority of Part 111 and Part 121 of Act 451, 1994, as amended.

Failure to file may subject you to criminal and/or civil penalties under Sections 324.11151 or 324.12116 MCL.

Please print or type.

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. MID005354386
Manifest Document No.
2. Page 1 of 1
Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
WOLVERINE GASKET & MFG.
2639 PRINCESS
INKSTER, MI 48141
4. Generator's Phone (517) 610-1136

DEC 13 2004
DOUG ROMMECK

A. State Manifest Document Number MI 9757378
B. State Generator's ID

5. Transporter 1 Company Name G&C
6. US EPA ID Number MIR000039761
C. State Transporter's ID
D. Transporter's Phone 734 356 6700

7. Transporter 2 Company Name
8. US EPA ID Number
E. State Transporter's ID
F. Transporter's Phone

9. Designated Facility Name and Site Address
MICHIGAN DISPOSAL WASTE TREATMENT PLANT
49350 NORTH I94 SERVICE DRIVE
BELLEVILLE, MICHIGAN 48111
10. US EPA ID Number MID000724831
G. State Facility's ID
H. Facility's Phone 800-592-5489

	11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID NUMBER).	HM	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	NON RCRA/NON DOT REGULATED SOLIDS	☐	001	DT	55(60)	P	SLUD
b.		☐					
c.		☐					
d.		☐					

J. Additional Descriptions for Materials Listed Above
APPROVAL# 11A 101D4TBB (CONTAMINATED SOIL)

K. Handling Codes
a
b
c
d

15. Special Handling Instructions and Additional Information

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR; if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: Douglas Rommeck
Signature:
Date: Month 10 Day 17 Year 04

17. Transporter 1 Acknowledgment of Receipt of Materials
Printed/Typed Name
Signature
Date: Month Day Year

18 Transporter 2 Acknowledgment of Receipt of Materials
Printed/Typed Name
Signature
Date: Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name
Signature
Date: Month Day Year

GENERATOR
TRANSPORTER
FACILITY

ALL SPILLS MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHIGAN AT 1-800-292-4706 OR OUT OF STATE AT 517-373-7660 AND THE NATIONAL RESPONSE CENTER AT 1-800-424-8802 24 HOUR PER DAY.

GENERAL INSTRUCTIONS

Read all instructions before completing this form. This form has been designed for use on a 12-pitch (elite) typewriter/computer printer; a firm point pen may also be used - press down hard. Ensure all copies are legible.

Federal and state regulations require generators and transporters of hazardous waste and owners or operators of hazardous waste treatment, storage, and disposal facilities to use this form (8700-22) and, if necessary, the continuation sheet (Form 8700-22A) for both inter- and intrastate transportation of hazardous waste as defined in 40 CFR and Part 111 of Act 451 of 1994, as amended (Part 111). State regulations also require the use of this manifest for all regulated shipments of liquid industrial waste as required in Part 121 of Act 451 of 1994, as amended (Part 121).

Federal and State regulations provide for additional requirements, not included in these instructions, regarding the use and management of this form (40 CFR, 49 CFR, Part 111, Part 121).

Additional information such as "Rejected Load Procedures", state assigned identification numbers, manifest forms, etc., can be obtained by contacting the Michigan Department of Environmental Quality (MDEQ), Waste Management Divisions (WMD) Internet Home Page at http://www.deq.state.mi.us/wmd or you may contact the Manifest Unit directly at (517) 373-1217. Continuation sheets are not supplied by MDEQ.

Complete all items on the manifest. Enter "N/A" if any item does not apply. Leave items that may be needed later blank, such as a second transporter.

Item 1. Enter the generator's U.S. EPA twelve digit identification number. For Part 121 manifested shipments where a generator does not have a U.S. EPA assigned number, a state assigned number must be obtained and used. The generator of the waste must enter a unique five digit manifest document number (e.g. 00001).

Item 2. Page number 1 of 1 should be recorded unless a continuation sheet is used, in which case the total number of pages, counting the initial manifest page, should be shown.

Item 3. Enter the name of the generator and the mailing address to which the manifest should be mailed. If the address of the site at which the waste was placed into transportation is different from the mailing address record the site address in Item J.

Item 4. Enter a telephone number (including area code) where an authorized agent of the generator can be reached in the event of an emergency and/or a partial or total rejected load.

NOTE: The 24 hour emergency phone number required for a hazardous materials shipping paper may be different from the generator's phone number.

Item 5. Enter the company name of the first transporter who will transport the waste.

Item 6. Enter the transporter's U.S. EPA twelve digit identification number. For Part 121 manifested shipments where a transporter does not have a U.S. EPA assigned number, a state assigned number is to be used.

Item 7. If using a second transporter, enter the company name.

Item 8. Enter the second transporter's U.S. EPA twelve digit identification number. For Part 121 manifested shipments where a transporter does not have a U.S. EPA assigned number, a state number is to be used.

NOTE: If more than two transporters are used, the generator or third transporter shall initiate a continuation sheet. In Item L of the continuation sheet, the generator/transporter must copy the State manifest document number listed in Item A. Every transport company used between the generator and the designated facility (except for intermediate rail or barge transporters used between the initial rail or barge carriers and the designated facility) must be listed. This is not intended to require multiple signatures for individual drivers working for one transporter. Item 2 is to be changed to reflect the added page(s). Continuation sheets must be appropriately completed in their entirety and properly distributed. Continuation sheets may not be used to list additional waste streams.

Item 9. Enter the company name and site address of the facility designated to receive the waste listed on this manifest.

Item 10. Enter the U.S. EPA twelve digit identification number for the designated facility described in Item 9. For Part 121 manifested shipments where a designated facility does not have a U.S. EPA assigned number, a state assigned number is to be used.

Item 11. Enter an X in the HM box if the waste is a hazardous material regulate by U.S. DOT (See 49 CFR 172). Enter the required U.S. DOT shipping description, including Proper Shipping Name, Hazard Class or Division, ID Number (UN/NA), and packing group for each waste as identified in 49 CFR 172. Additional information may also be required in this space, including technical name and reportable quantity references. For only Part 121 regulated wastes include an appropriate shipping description for the waste stream.

Item 12. Enter the number of containers for each waste and the appropriate abbreviations listed below for the type of container. Each container type requires separate entry.

DM = Metal drums, barrels, kegs	CY = Cylinders
DW = Wooden drums, barrels, kegs	CM = Metal boxes, cartons, cases (including roll-offs)
DF = Fiberboard or plastic drums, barrels, kegs	CW = Wooden boxes, cartons, cases
DT = Dump truck	CF = Fiber or plastic boxes, cartons, cases
TP = Tanks, portable	BA = Burlap, cloth, paper / plastic bags
TT = Cargo tanks (tank trucks)	
TC = Tank cars	

Item 13. Enter the total quantity of waste described on each line. Do not use decimals or fractions.

Item 14. Enter the appropriate abbreviation for the unit of measure listed below.

G = Gallons (liquids only)	L = Liters (liquids only)
P = Pounds	K = Kilograms
T = Tons (2000 lbs.)	M = Metric tons (1000 kg)
Y = Cubic yards	N = Cubic meters

Item 15. The generator may use this space to indicate special transportation, treatment, storage or disposal information. Import/Export information as noted in the "International Shipment" instructions section is to be recorded here.

Item 16. The generator must read, print his/her name, sign and date the certification statement.

Item 17. Print the name of the person accepting the waste on behalf of the first transporter. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

Item 18. If applicable, print the name of the person accepting the waste on behalf of the second transporter. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

Item 19. An authorized representative of the designated (or alternate) facility must note in this space any discrepancy in the waste shipment.

Item 20. Print the name of the person accepting the waste on behalf of the designated facility. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

NOTE: MDEQ "Rejected Load Procedures" provides guidance for partial or total load rejections.

Only the following information in the shaded area is a State of Michigan requirement:

Item A. A preprinted State manifest document number.

Item B - H. May be required by other states.

Item I. For hazardous wastes, enter the appropriate waste numbers found in R299.9212 through R299.9214 of Part 111 and 40 CFR 261 Subparts C and D. If more than one waste number is required to appropriately identify the waste, enter the additional numbers in Item J. In selecting the most appropriate waste number the following hierarchy must be used: acute waste (including P and acute F), U (toxic), K (specific sources), non-acute F (non-specific sources) and D (characteristic). State regulated wastes follow the same hierarchy as federally regulated wastes. For Part 121 wastes which are not hazardous wastes enter the appropriate code listed below.

Mixed Solvents	007L	Storm Sewer Cleanouts	031L
Pharmaceutical	014L	Sanitary Sewer Cleanouts	032L
Crankcase Oil	017L	X-Ray/Photo Solutions	033L
Coolants and Water Soluble Oils	019L	Water Based Cleaning Solutions	034L
Other Oil (Describe in Item 11 or Item J)	021L	Car Wash Sludges	035L
Brine	022L	Grease Trap Wastes	036L
PCB	026L		
Other Wastes (Describe in Item 11 or Item J)	029L		
Antifreeze	030L		

Item J. Generators are to use this space for the site address if different from the mailing address noted in Item 3; additional waste codes, additional description for a Part 121 waste as noted in Item I of these instructions, approval of commingling authority as required in R299.9304(6).

Item K. List any specific codes which apply.

Burned for Energy Recovery	B
Conditionally Exempt Small Quantity Generator	C
Emergency Response Cleanup	E
Household Generated	H
Recycled Precious Metals	P
Recycled, Reclaimed, Used or Reused	R
Universal Waste	U

INTERNATIONAL SHIPMENTS

Exports- Transporters must sign and enter the date the waste leaves the United States in Item 15. The primary exporter must identify the point of departure from the United States.*

Imports- Shipments of hazardous and Part 121 regulated wastes must be accompanied by a U.S. EPA Uniform Hazardous Waste Manifest. Any person functioning as the U.S. Importer, as defined in Part 111, must complete the manifest as required in R299.9310*

*Transporters of hazardous waste shipments must deliver a copy of the manifest to U.S. Customs when importing or exporting the waste across U.S. borders. Record the foreign waste manifest document number in Item J.

MANIFEST DISTRIBUTION

GENERATOR: Upon placing the waste into transportation (first transporter signs and dates manifest) remove the white and gold banded copies and give the remainder of the manifest copies to the transporter. Sent the white copy to MDEQ no later than the tenth day of the month following the shipment. For shipments of wastes being transported to a designated facility outside of Michigan when an out-of-state manifest is used, mail to the MDEQ a photocopy of the manifest when the shipment is placed into transportation and mail a photocopy of the second generator manifest copy, when received.

TRANSPORTER: Upon delivery to the designated (or alternate) facility, and that facility signs and dates the manifest, the canary banded copy will be returned to you. If more than one transporter is used, the manifest is to be copied and supplied to the previous transporter acknowledging the receipt of the shipment by the next transporter. The canary banded copy stays with the manifest until the shipment reaches the designated facility.

DESIGNATED FACILITY: Upon signing and dating the manifest as received, give the canary banded

ADDRESS ALL MDEQ MANIFEST COPIES TO:
WASTE MANAGEMENT DIVISION
MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
PO BOX 30038
LANSING MI 48909-7538

The public reporting burden for this collection of information is estimated to average 31 minutes for generators, 16 minutes for transporters, and 18 minutes for treatment, storage and disposal facilities. The record-keeping burden per response for this collection of information is estimated to average 6 minutes for generators, 5 minutes for transporters, and 6 minutes for treatment, storage and disposal facilities. The burden associated with reading the regulations is estimated at 1 hour and 15 minutes annually. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency.

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB numbers for EPA's regulations are listed in 40 CFR Part 9 and 48 CFR Chapter 15. Send comments regarding these burden statements or any other aspect of this collection, including suggestions for reducing the burden, including through use of automated collection techniques to the Director, OPPE Regulatory Information Division, U.S. Environmental Protection Agency (2 137), 401 M St., S.W., Washington, D.C. 20460 and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Attention: Desk Officer for EPA, 725 17th Street, N.W., Washington, D.C. 20503. Include the OMB control number in any correspondence.

DEQ WASTE MANAGEMENT DIVISION
MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY

DO NOT WRITE IN THIS SPACE
ATT. ☐ DIS. ☐ REJ. ☐ PR. ☐

Required under authority of Part 111 and Part 121 of Act 451, 1994, as amended.

Failure to file may subject you to criminal and/or civil penalties under Sections 324.11151 or 324.12116 MCL.

Please print or type.

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. MID005354386

Manifest Document No.

2. Page 1 of 1

Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
WOLVERINE GASKET & MFG
3930 PRINCE ST
INKSTER, MI 48141

4. Generator's Phone (517) 810 1136 DOUG ROMMECK

A. State Manifest Document Number MI 9757378

B. State Generator's ID

5. Transporter 1 Company Name G&C

6. US EPA ID Number MIR000039701

C. State Transporter's ID 734-288-6089

D. Transporter's Phone

7. Transporter 2 Company Name

8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address
MICHIGAN DISPOSAL WASTE TREATMENT PLANT
49350 NORTH 194 SERVICE DRIVE
BELLEVILLE, MICHIGAN 48111

10. US EPA ID Number MID000724831

G. State Facility's ID

H. Facility's Phone 800-592-5489

	HM	11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID NUMBER).	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	☐	NON RCRA/NON DOT REGULATED SOLIDS	001	DT		P	SLUD
b.	☐						
c.	☐						
d.	☐						

J. Additional Descriptions for Materials Listed Above
APPROVAL# 11A 101904TBB (CONTAMINATED SOIL)

K. Handling Codes
a
b
c
d

15. Special Handling Instructions and Additional Information

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name	Signature	Date Month Day Year
Douglas Rommeck	[signature]	10 17 04

17. Transporter 1 Acknowledgment of Receipt of Materials

Printed/Typed Name	Signature	Date Month Day Year

18 Transporter 2 Acknowledgment of Receipt of Materials

Printed/Typed Name	Signature	Date Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Date Month Day Year

GENERATOR

TRANSPORTER

FACILITY

ALL SPILLS MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHIGAN AT 1-800-292-4706 OR OUT OF STATE AT 517-373-7660 AND THE NATIONAL RESPONSE CENTER AT 1-800-424-8802 24 HOUR PER DAY.

EPA Form 8700-22 (Rev. 9/88)

GENERATOR 1st COPY

EQP 5110 Rev. 7/03

MI0012862

GENERAL INSTRUCTIONS

Read all instructions before completing this form. This form has been designed for use on a 12-pitch (elite) typewriter/computer printer; a firm point pen may also be used - press down hard. Ensure all copies are legible.

Federal and state regulations require generators and transporters of hazardous waste and owners or operators of hazardous waste treatment, storage, and disposal facilities to use this form (8700-22) and, if necessary, the continuation sheet (Form 8700-22A) for both inter- and intrastate transportation of hazardous waste as defined in 40 CFR and Part 111 of Act 451 of 1994, as amended (Part 111). State regulations also require the use of this manifest for all regulated shipments of liquid industrial waste as required in Part 121 of Act 451 of 1994, as amended (Part 121).

Federal and State regulations provide for additional requirements, not included in these instructions, regarding the use and management of this form (40 CFR, 49 CFR, Part 111, Part 121).

Additional information such as "Rejected Load Procedures", state assigned identification numbers, manifest forms, etc., can be obtained by contacting the Michigan Department of Environmental Quality (MDEQ), Waste Management Divisions (WMD) Internet Home Page at http://www.deq.state.mi.us/wmd or you may contact the Manifest Unit directly at (517) 373-1217. Continuation sheets are not supplied by MDEQ.

Complete all items on the manifest. Enter "N/A" if any item does not apply. Leave items that may be needed later blank, such as a second transporter.

Item 1. Enter the generator's U.S. EPA twelve digit identification number. For Part 121 manifested shipments where a generator does not have a U.S. EPA assigned number, a state assigned number must be obtained and used. The generator of the waste must enter a unique five digit manifest document number (e.g. 00001).

Item 2. Page number 1 of 1 should be recorded unless a continuation sheet is used, in which case the total number of pages, counting the initial manifest page, should be shown.

Item 3. Enter the name of the generator and the mailing address to which the manifest should be mailed. If the address of the site at which the waste was placed into transportation is different from the mailing address record the site address in item J.

Item 4. Enter a telephone number (including area code) where an authorized agent of the generator can be reached in the event of an emergency and/or a partial or total rejected load.

NOTE: The 24 hour emergency phone number required for a hazardous materials shipping paper may be different from the generator's phone number.

Item 5. Enter the company name of the first transporter who will transport the waste.

Item 6. Enter the transporter's U.S. EPA twelve digit identification number. For Part 121 manifested shipments where a transporter does not have a U.S. EPA assigned number, a state assigned number is to be used.

Item 7. If using a second transporter, enter the company name.

Item 8. Enter the second transporter's U.S. EPA twelve digit identification number. For Part 121 manifested shipments where a transporter does not have a U.S. EPA assigned number, a state number is to be used.

NOTE: If more than two transporters are used, the generator or third transporter shall initiate a continuation sheet. In Item L of the continuation sheet, the generator/transporter must copy the State manifest document number listed in Item A. Every transport company used between the generator and the designated facility (except for intermediate rail or barge transporters used between the initial rail or barge carriers and the designated facility) must be listed. This is not intended to require multiple signatures for individual drivers working for one transporter. Item 2 is to be changed to reflect the added page(s). Continuation sheets must be appropriately completed in their entirety and properly distributed. Continuation sheets may not be used to list additional waste streams.

Item 9. Enter the company name and site address of the facility designated to receive the waste listed on this manifest.

Item 10. Enter the U.S. EPA twelve digit identification number for the designated facility described in Item 9. For Part 121 manifested shipments where a designated facility does not have a U.S. EPA assigned number, a state assigned number is to be used.

Item 11. Enter an X in the HM box if the waste is a hazardous material regulated by U.S. DOT (See 49 CFR 172). Enter the required U.S. DOT shipping description, including Proper Shipping Name, Hazard Class or Division, ID Number (UN/NA), and packing group for each waste as identified in 49 CFR 172. Additional information may also be required in this space, including technical name and reportable quantity references. For only Part 121 regulated wastes include an appropriate shipping description for the waste stream.

Item 12. Enter the number of containers for each waste and the appropriate abbreviations listed below for the type of container. Each container type requires separate entry.

DM = Metal drums, barrels, kegs	CY = Cylinders
DW = Wooden drums, barrels, kegs	CM = Metal boxes, cartons, cases (including roll-offs)
DF = Fiberboard or plastic drums, barrels, kegs	CW = Wooden boxes, cartons, cases
DT = Dump truck	CF = Fiber or plastic boxes, cartons, cases
TP = Tanks, portable	BA = Burlap, cloth, paper / plastic bags
TT = Cargo tanks (tank trucks)	
TC = Tank cars	

Item 13. Enter the total quantity of waste described on each line. Do not use decimals or fractions.

Item 14. Enter the appropriate abbreviation for the unit of measure listed below.

G = Gallons (liquids only)	L = Liters (liquids only)
P = Pounds	K = Kilograms
T = Tons (2000 lbs.)	M = Metric tons (1000 kg)
Y = Cubic yards	N = Cubic meters

Item 15. The generator may use this space to indicate special transportation, treatment, storage or disposal information. Import/Export information as noted in the "International Shipment" instructions section is to be recorded here.

Item 16. The generator must read, print his/her name, sign and date the certification statement.

Item 17. Print the name of the person accepting the waste on behalf of the first transporter. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

Item 18. If applicable, print the name of the person accepting the waste on behalf of the second transporter. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

Item 19. An authorized representative of the designated (or alternate) facility must note in this space any discrepancy in the waste shipment.

Item 20. Print the name of the person accepting the waste on behalf of the designated facility. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

NOTE: MDEQ "Rejected Load Procedures" provides guidance for partial or total load rejections.

Only the following information in the shaded area is a State of Michigan requirement:

Item A. A preprinted State manifest document number.

Item B - H. May be required by other states.

Item I. For hazardous wastes, enter the appropriate waste numbers found in R299.9212 through R299.9214 of Part 111 and 40 CFR 261 Subparts C and D. If more than one waste number is required to appropriately identify the waste, enter the additional numbers in item J. In selecting the most appropriate waste number the following hierarchy must be used: acute waste (including P and acute F), U (toxic), K (specific sources), non-acute F (non-specific sources) and D (characteristic). State regulated wastes follow the same hierarchy as federally regulated wastes. For Part 121 wastes which are not hazardous wastes enter the appropriate code listed below.

Mixed Solvents	007L	Storm Sewer Cleanouts	031L
Pharmaceutical	014L	Sanitary Sewer Cleanouts	032L
Crankcase Oil	017L	X-Ray/Photo Solutions	033L
Coolants and Water Soluble Oils	019L	Water Based Cleaning Solutions	034L
Other Oil (Describe in Item 11 or Item J)	021L	Car Wash Sludges	035L
Brine	022L	Grease Trap Wastes	036L
PCB	026L		
Other Wastes (Describe in Item 11 or Item J)	029L		
Antifreeze	030L		

Item J. Generators are to use this space for the site address if different from the mailing address noted in Item 3, additional waste codes, additional description for a Part 121 waste as noted in Item I of these instructions, approval of commingling authority as required in R299.9304(6).

Item K. List any specific codes which apply.

Burned for Energy Recovery	B
Conditionally Exempt Small Quantity Generator	C
Emergency Response Cleanup	E
Household Generated	H
Recycled Precious Metals	P
Recycled, Reclaimed, Used or Reused	R
Universal Waste	U

INTERNATIONAL SHIPMENTS

Exports - Transporters must sign and enter the date the waste leaves the United States in Item 15. The primary exporter must identify the point of departure from the United States.*

Imports - Shipments of hazardous and Part 121 regulated wastes must be accompanied by a U.S. EPA Uniform Hazardous Waste Manifest. Any person functioning as the U.S. importer, as defined in Part 111, must complete the manifest as required in R299.9310*.

*Transporters of hazardous waste shipments must deliver a copy of the manifest to U.S. Customs when importing or exporting the waste across U.S. borders. Record the foreign waste manifest document number in Item J.

MANIFEST DISTRIBUTION

GENERATOR: Upon placing the waste into transportation (first transporter signs and dates manifest) remove the white and gold banded copies and give the remainder of the manifest copies to the transporter. Sent the white copy to MDEQ no later than the tenth day of the month following the shipment. For shipments of wastes being transported to a designated facility outside of Michigan when an out-of-state manifest is used, mail to the MDEQ a photocopy of the manifest when the shipment is placed into transportation and mail a photocopy of the second generator manifest copy, when received.

TRANSPORTER: Upon delivery to the designated (or alternate) facility, and that facility signs and dates the manifest, the canary banded copy will be returned to you. If more than one transporter is used, the manifest is to be copied and supplied to the previous transporter acknowledging the receipt of the shipment by the next transporter. The canary banded copy stays with the manifest until the shipment reaches the designated facility.

DESIGNATED FACILITY: Upon signing and dating the manifest as received, give the canary banded

ADDRESS ALL MDEQ MANIFEST COPIES TO:
WASTE MANAGEMENT DIVISION
MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
PO BOX 30038
LANSING MI 48909-7538

The public reporting burden for this collection of information is estimated to average 31 minutes for generators, 18 minutes for transporters, and 14 minutes for treatment, storage and disposal facilities. The record-keeping burden per response for this collection of information is estimated to average 6 minutes for generators, 5 minutes for transporters, and 8 minutes for treatment, storage and disposal facilities. The burden associated with reading the regulations is estimated at 1 hour and 15 minutes annually. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency.

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB numbers for EPA's regulations are listed in 40 CFR Part 9 and 48 CFR Chapter 15. Send comments regarding these burden estimates or any other aspect of this collection, including suggestions for reducing the burden, including through use of automated collection techniques to the Director, OPPE Regulatory Information Division, U.S. Environmental Protection Agency (2137), 401 M St., S.W., Washington, D.C. 20460 and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Attention: Desk Officer for EPA, 725 17th Street, N.W., Washington, D.C. 20503. Include the OMB control number in any correspondence.

MI0012863

MI0012864

CERTIFICATE OF DISPOSAL

DEC 13 2001

This certificate is to verify the wastes specified on Manifest # MI9757578

have been properly disposed of in accordance with all local, state and federal regulations.

"Disposed of" means either: 1) Burial or 2) Processed as specified in 40 CFR et seq.

FACILITY NAME: *(Please check one)*

☑ Michigan Disposal Waste Treatment Plant (EPA I.D. # MID000724831)

☐ Wayne Disposal, Inc. (EPA I.D. # MID048090633)

ADDRESS: 49350 N. I-94 Service Drive
Belleville, Michigan 48111

PHONE NUMBER: 1-800-592-5489

FAX NUMBER: 1-800-592-5329

Authorized Signature: _____

THE ENVIRONMENTAL QUALITY COMPANY 49350 N. I-94 SERVICE DRIVE BELLEVILLE MICHIGAN 48111

FORM1020 (3/96)

DEQ WASTE MANAGEMENT DIVISION
MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY

DO NOT WRITE IN THIS SPACE
ATT. ☐ DIS. ☐ REJ. ☐ PR. ☐

Required under authority of Part 111 and Part 121 of Act 451, 1994, as amended.

Failure to file may subject you to criminal and/or civil penalties under Sections 324.11151 or 324.12116 MCL.

Please print or type. Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. MID005354386
Manifest Document No.
2. Page 1 of 1
Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
WOLVERINE GASKET & MFG.
2038 PRINCESS
INKSTER, MI 48141
4. Generator's Phone (517) 810-1138 DOUG ROMMECK

A. State Manifest Document Number MI 9757379
B. State Generator's ID

5. Transporter 1 Company Name S&C
6. US EPA ID Number MIR000039701
C. State Transporter's ID
D. Transporter's Phone 734-266-6009

7. Transporter 2 Company Name
8. US EPA ID Number
E. State Transporter's ID
F. Transporter's Phone

9. Designated Facility Name and Site Address
MICHIGAN DISPOSAL WASTE TREATMENT PLANT
49350 NORTH I94 SERVICE DRIVE
BELLEVILLE, MICHIGAN 48111
10. US EPA ID Number MID000724831
G. State Facility's ID
H. Facility's Phone 800-592-5489

	HM	11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID NUMBER).	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	☐	NON RCRA/NON DOT REGULATED SOLIDS	001	DT		P	SLUD
b.	☐						
c.	☐						
d.	☐						

J. Additional Descriptions for Materials Listed Above
APPROVAL# 11A 101904TBB (CONTAMINATED SOIL)

K. Handling Codes
a
b
c
d

15. Special Handling Instructions and Additional Information

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR; if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: Douglas Rommeck
Signature: [signature]
Date: Month 10 Day 27 Year 04

17. Transporter 1 Acknowledgment of Receipt of Materials
Printed/Typed Name
Signature
Date: Month Day Year

18 Transporter 2 Acknowledgment of Receipt of Materials
Printed/Typed Name
Signature
Date: Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name
Signature
Date: Month Day Year

GENERATOR

TRANSPORTER

FACILITY

ALL SPILLS MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHIGAN AT 1-800-292-4706 OR OUT OF STATE AT 517-373-7660 AND THE NATIONAL RESPONSE CENTER AT 1-800-424-8802 24 HOUR PER DAY.

EPA Form 8700-22 (Rev. 9/88) GENERATOR 2nd COPY EQP 5110 Rev. 7/03

MI0012865

GENERAL INSTRUCTIONS

Read all instructions before completing this form. This form has been designed for use on a 12-pitch (elite) typewriter/computer printer; a firm point pen may also be used - press down hard. Ensure all copies are legible.

Federal and state regulations require generators and transporters of hazardous waste and owners or operators of hazardous waste treatment, storage, and disposal facilities to use this form (8700-22) and, if necessary, the continuation sheet (Form 8700-22A) for both inter- and intrastate transportation of hazardous waste as defined in 40 CFR and Part 111 of Act 451 of 1994, as amended (Part 111). State regulations also require the use of this manifest for all regulated shipments of liquid industrial waste as required in Part 121 of Act 451 of 1994, as amended (Part 121).

Federal and State regulations provide for additional requirements, not included in these instructions, regarding the use and management of this form (40 CFR, 49 CFR, Part 111, Part 121).

Additional information such as "Rejected Load Procedures", state assigned identification numbers, manifest forms, etc., can be obtained by contacting the Michigan Department of Environmental Quality (MDEQ), Waste Management Divisions (WMD) Internet Home Page at http://www.deq.state.mi.us/wmd or you may contact the Manifest Unit directly at (517) 373-1217. Continuation sheets are not supplied by MDEQ.

Complete all items on the manifest. Enter "N/A" if any item does not apply. Leave items that may be needed later blank, such as a second transporter.

Item 1. Enter the generator's U.S. EPA twelve digit identification number. For Part 121 manifested shipments where a generator does not have a U.S. EPA assigned number, a state assigned number must be obtained and used. The generator of the waste must enter a unique five digit manifest document number (e.g. 00001).

Item 2. Page number 1 of 1 should be recorded unless a continuation sheet is used, in which case the total number of pages, counting the initial manifest page, should be shown.

Item 3. Enter the name of the generator and the mailing address to which the manifest should be mailed. If the address of the site at which the waste was placed into transportation is different from the mailing address record the site address in item J.

Item 4. Enter a telephone number (including area code) where an authorized agent of the generator can be reached in the event of an emergency and/or a partial or total rejected load.

NOTE: The 24 hour emergency phone number required for a hazardous materials shipping paper may be different from the generator's phone number.

Item 5. Enter the company name of the first transporter who will transport the waste.

Item 6. Enter the transporter's U.S. EPA twelve digit identification number. For Part 121 manifested shipments where a transporter does not have a U.S. EPA assigned number, a state assigned number is to be used.

Item 7. If using a second transporter, enter the company name.

Item 8. Enter the second transporter's U.S. EPA twelve digit identification number. For Part 121 manifested shipments where a transporter does not have a U.S. EPA assigned number, a state number is to be used.

NOTE: If more than two transporters are used, the generator or third transporter shall initiate a continuation sheet. In Item L of the continuation sheet, the generator/transporter must copy the State manifest document number listed in Item A. Every transport company used between the generator and the designated facility (except for intermediate rail or barge transporters used between the initial rail or barge carriers and the designated facility) must be listed. This is not intended to require multiple signatures for individual drivers working for one transporter. Item 2 is to be changed to reflect the added page(s). Continuation sheets must be appropriately completed in their entirety and properly distributed. Continuation sheets may not be used to list additional waste streams.

Item 9. Enter the company name and site address of the facility designated to receive the waste listed on this manifest.

Item 10. Enter the U.S. EPA twelve digit identification number for the designated facility described in Item 9. For Part 121 manifested shipments where a designated facility does not have a U.S. EPA assigned number, a state assigned number is to be used.

Item 11. Enter an X in the HM box if the waste is a hazardous material regulate by U.S. DOT (See 49 CFR 172). Enter the required U.S. DOT shipping description, including Proper Shipping Name, Hazard Class or Division, ID Number (UN/NA), and packing group for each waste as identified in 49 CFR 172. Additional information may also be required in this space, including technical name and reportable quantity references. For only Part 121 regulated wastes include an appropriate shipping description for the waste stream.

Item 12. Enter the number of containers for each waste and the appropriate abbreviations listed below for the type of container. Each container type requires separate entry.

DM = Metal drums, barrels, kegs	CY = Cylinders
DW = Wooden drums, barrels, kegs	CM = Metal boxes, cartons, cases (including roll-offs)
DF = Fiberboard or plastic drums, barrels, kegs	
DT = Dump truck	CW = Wooden boxes, cartons, cases
TP = Tanks, portable	CF = Fiber or plastic boxes, cartons, cases
TT = Cargo tanks (tank trucks)	BA = Burlap, cloth, paper / plastic bags
TC = Tank cars	

Item 13. Enter the total quantity of waste described on each line. Do not use decimals or fractions.

Item 14. Enter the appropriate abbreviation for the unit of measure listed below.

G = Gallons (liquids only)	L = Liters (liquids only)
P = Pounds	K = Kilograms
T = Tons (2000 lbs.)	M = Metric tons (1000 kg)
Y = Cubic yards	N = Cubic meters

Item 15. The generator may use this space to indicate special transportation, treatment, storage or disposal information. Import/Export information as noted in the "International Shipment" instructions section is to be recorded here.

Item 16. The generator must read, print his/her name, sign and date the certification statement.

Item 17. Print the name of the person accepting the waste on behalf of the first transporter. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

Item 18. If applicable, print the name of the person accepting the waste on behalf of the second transporter. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

Item 19. An authorized representative of the designated (or alternate) facility must note in this space any discrepancy in the waste shipment.

Item 20. Print the name of the person accepting the waste on behalf of the designated facility. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

NOTE: MDEQ "Rejected Load Procedures" provides guidance for partial or total load rejections.

Only the following information in the shaded area is a State of Michigan requirement:

Item A. A preprinted State manifest document number.

Item B - H. May be required by other states.

Item I. For hazardous wastes, enter the appropriate waste numbers found in R299.9212 through R299.9214 of Part 111 and 40 CFR 261 Subparts C and D. If more than one waste number is required to appropriately identify the waste, enter the additional numbers in item J. In selecting the most appropriate waste number the following hierarchy must be used: acute waste (including P and acute F), U (toxic), K (specific sources), non-acute F (non-specific sources) and D (characteristic). State regulated wastes follow the same hierarchy as federally regulated wastes. For Part 121 wastes which are not hazardous wastes enter the appropriate code listed below.

Mixed Solvents	007L	Storm Sewer Cleanouts	031L
Pharmaceutical	014L	Sanitary Sewer Cleanouts	032L
Crankcase Oil	017L	X-Ray/Photo Solutions	033L
Coolants and Water Soluble Oils	019L	Water Based Cleaning Solutions	034L
Other Oil (Describe in Item 11 or Item J)	021L	Car Wash Sludges	035L
Brine	022L	Grease Trap Wastes	036L
PCB	026L		
Other Wastes (Describe in Item 11 or Item J)	029L		
Antifreeze	030L		

Item J. Generators are to use this space for the site address if different from the mailing address noted in Item 3, additional waste codes, additional description for a Part 121 waste as noted in Item I of these instructions, approval of commingling authority as required in R299.9304(6).

Item K. List any specific codes which apply.

Burned for Energy Recovery	B
Conditionally Exempt Small Quantity Generator	C
Emergency Response Cleanup	E
Household Generated	H
Recycled Precious Metals	P
Recycled, Reclaimed, Used or Reused	R
Universal Waste	U

INTERNATIONAL SHIPMENTS

Exports- Transporters must sign and enter the date the waste leaves the United States in Item 15. The primary exporter must identify the point of departure from the United States.*

Imports- Shipments of hazardous and Part 121 regulated wastes must be accompanied by a U.S. EPA Uniform Hazardous Waste Manifest. Any person functioning as the U.S. Importer, as defined in Part 111, must complete the manifest as required in R299.9310*.

*Transporters of hazardous waste shipments must deliver a copy of the manifest to U.S. Customs when importing or exporting the waste across U.S. borders. Record the foreign waste manifest document number in Item J.

MANIFEST DISTRIBUTION

GENERATOR: Upon placing the waste into transportation (first transporter signs and dates manifest) remove the white and gold banded copies and give the remainder of the manifest copies to the transporter. Sent the white copy to MDEQ no later than the tenth day of the month following the shipment. For shipments of wastes being transported to a designated facility outside of Michigan when an out-of-state manifest is used, mail to the MDEQ a photocopy of the manifest when the shipment is placed into transportation and mail a photocopy of the second generator manifest copy, when received.

TRANSPORTER: Upon delivery to the designated (or alternate) facility, and that facility signs and dates the manifest, the canary banded copy will be returned to you. If more than one transporter is used, the manifest is to be copied and supplied to the previous transporter acknowledging the receipt of the shipment by the next transporter. The canary banded copy stays with the manifest until the shipment reaches the designated facility.

DESIGNATED FACILITY: Upon signing and dating the manifest as received, give the canary banded

ADDRESS ALL MDEQ MANIFEST COPIES TO:
WASTE MANAGEMENT DIVISION
MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
PO BOX 30038
LANSING MI 48909-7538

The public reporting burden for this collection of information is estimated to average 31 minutes for generators, 16 minutes for transporters, and 18 minutes for treatment, storage and disposal facilities. The record-keeping burden per response for this collection of information is estimated to average 8 minutes for generators, 6 minutes for transporters, and 6 minutes for treatment, storage and disposal facilities. The burden associated with reading the regulations is estimated at 1 hour and 15 minutes annually. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency.

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB numbers for EPA's regulations are listed in 40 CFR Part 9 and 48 CFR Chapter 15. Send comments regarding these burden statements or any other aspect of this collection, including suggestions for reducing the burden, including through use of automated collection techniques to the Director, OPPE Regulatory Information Division, U.S. Environmental Protection Agency (2.07), 401 M St., S.W. Washington, D.C., 20460 and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Attention: Desk Officer for EPA, 725 17th Street, N.W., Washington, D.C. 20503. Include the OMB control number in any correspondence.

MI0012866

DEQ WASTE MANAGEMENT DIVISION
MICHIGAN DEPARTMENT OF
ENVIRONMENTAL QUALITY

DO NOT WRITE IN THIS SPACE
ATT. ☐ DIS. ☐ REJ. ☐ PR. ☐

Required under authority of Part 111 and Part 121 of Act 451, 1994, as amended.

Failure to file may subject you to criminal and/or civil penalties under Sections 324.11151 or 324.12116 MCL.

Please print or type.

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. MID005354380
Manifest Document No.
2. Page 1 of 1
Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
WOLVERINE GASKET & MFG.
2638 PRINCESS
INKSTER, MI 48141
4. Generator's Phone (517) 810-1139 DOUG ROMMECK

A. State Manifest Document Number MI 9757379
B. State Generator's ID

5. Transporter 1 Company Name S&C
6. US EPA ID Number MIR000039701
C. State Transporter's ID
D. Transporter's Phone 734-206-0009

7. Transporter 2 Company Name
8. US EPA ID Number
E. State Transporter's ID
F. Transporter's Phone

9. Designated Facility Name and Site Address
MICHIGAN DISPOSAL WASTE TREATMENT PLANT
49350 NORTH I94 SERVICE DRIVE
BELLEVILLE, MICHIGAN, 48111
10. US EPA ID Number MID000724831
G. State Facility's ID
H. Facility's Phone 800-592-5489

	11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID NUMBER). HM		12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	☐	NON RCRA/NON DOT REGULATED SOLIDS	001	DT		P	SLUD
b.	☐						
c.	☐						
d.	☐						

J. Additional Descriptions for Materials Listed Above
APPROVAL# 11A: 161904TBH (CONTAMINATED SOIL)

K. Handling Codes
a
b
c
d

15. Special Handling Instructions and Additional Information

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR; if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: Douglas Rommeck
Signature: [signature]
Date: Month 10 Day 27 Year 04

17. Transporter 1 Acknowledgment of Receipt of Materials
Printed/Typed Name
Signature
Date: Month Day Year

18 Transporter 2 Acknowledgment of Receipt of Materials
Printed/Typed Name
Signature
Date: Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name
Signature
Date: Month Day Year

GENERATOR

TRANSPORTER

FACILITY

ALL SPILLS MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHIGAN AT 1-800-292-4706 OR OUT OF STATE AT 517-373-7660 AND THE NATIONAL RESPONSE CENTER AT 1-800-424-8802 24 HOUR PER DAY.

EPA Form 8700-22 (Rev. 9/88)

GENERATOR 1st COPY

EQP 5110 Rev. 7/03

MI0012867

GENERAL INSTRUCTIONS

Read all instructions before completing this form. This form has been designed for use on a 12-pitch (elite) typewriter/computer printer: a firm point pen may also be used - press down hard. Ensure all copies are legible.

Federal and state regulations require generators and transporters of hazardous waste and owners or operators of hazardous waste treatment, storage, and disposal facilities to use this form (8700-22) and, if necessary, the continuation sheet (Form 8700-22A) for both inter- and intrastate transportation of hazardous waste as defined in 40 CFR and Part 111 of Act 451 of 1994, as amended (Part 111). State regulations also require the use of this manifest for all regulated shipments of liquid industrial waste as required in Part 121 of Act 451 of 1994, as amended (Part 121).

Federal and State regulations provide for additional requirements, not included in these instructions, regarding the use and management of this form (40 CFR, 49 CFR, Part 111, Part 121).

Additional information such as "Rejected Load Procedures", state assigned identification numbers, manifest forms, etc., can be obtained by contacting the Michigan Department of Environmental Quality (MDEQ), Waste Management Divisions (WMD) Internet Home Page at http://www.deq.state.mi.us/wmd or you may contact the Manifest Unit directly at (517) 373-1217. Continuation sheets are not supplied by MDEQ.

Complete all items on the manifest. Enter "N/A" if any item does not apply. Leave items that may be needed later blank, such as a second transporter.

Item 1. Enter the generator's U.S. EPA twelve digit identification number. For Part 121 manifested shipments where a generator does not have a U.S. EPA assigned number, a state assigned number must be obtained and used. The generator of the waste must enter a unique five digit manifest document number (e.g. 00001).

Item 2. Page number 1 of 1 should be recorded unless a continuation sheet is used, in which case the total number of pages, counting the initial manifest page, should be shown.

Item 3. Enter the name of the generator and the mailing address to which the manifest should be mailed. If the address of the site at which the waste was placed into transportation is different from the mailing address record the site address in item J.

Item 4. Enter a telephone number (including area code) where an authorized agent of the generator can be reached in the event of an emergency and/or a partial or total rejected load.

NOTE: The 24 hour emergency phone number required for a hazardous materials shipping paper may be different from the generator's phone number.

Item 5. Enter the company name of the first transporter who will transport the waste.

Item 6. Enter the transporter's U.S. EPA twelve digit identification number. For Part 121 manifested shipments where a transporter does not have a U.S. EPA assigned number, a state assigned number is to be used.

Item 7. If using a second transporter, enter the company name.

Item 8. Enter the second transporter's U.S. EPA twelve digit identification number. For Part 121 manifested shipments where a transporter does not have a U.S. EPA assigned number, a state number is to be used.

NOTE: If more than two transporters are used, the generator or third transporter shall initiate a continuation sheet. In Item L of the continuation sheet, the generator/transporter must copy the State manifest document number listed in Item A. Every transport company used between the generator and the designated facility (except for intermediate rail or barge transporters used between the initial rail or barge carriers and the designated facility) must be listed. This is not intended to require multiple signatures for individual drivers working for one transporter. Item 2 is to be changed to reflect the added page(s). Continuation sheets must be appropriately completed in their entirety and properly distributed. Continuation sheets may not be used to list additional waste streams.

Item 9. Enter the company name and site address of the facility designated to receive the waste listed on this manifest.

Item 10. Enter the U.S. EPA twelve digit identification number for the designated facility described in Item 9. For Part 121 manifested shipments where a designated facility does not have a U.S. EPA assigned number, a state assigned number is to be used.

Item 11. Enter an X in the HM box if the waste is a hazardous material regulate by U.S. DOT (See 49 CFR 172). Enter the required U.S. DOT shipping description, including Proper Shipping Name, Hazard Class or Division, ID Number (UN/NA), and packing group for each waste as identified in 49 CFR 172. Additional information may also be required in this space, including technical name and reportable quantity references. For only Part 121 regulated wastes include an appropriate shipping description for the waste stream.

Item 12. Enter the number of containers for each waste and the appropriate abbreviations listed below for the type of container. Each container type requires separate entry.

DM = Metal drums, barrels, kegs	CY = Cylinders
DW = Wooden drums, barrels, kegs	CM = Metal boxes, cartons, cases (including roll-offs)
DF = Fiberboard or plastic drums, barrels, kegs	CW = Wooden boxes, cartons, cases
DT = Dump truck	CF = Fiber or plastic boxes, cartons, cases
TP = Tanks, portable	BA = Burlap, cloth, paper / plastic bags
TT = Cargo tanks (tank trucks)	
TC = Tank cars	

Item 13. Enter the total quantity of waste described on each line. Do not use decimals or fractions.

Item 14. Enter the appropriate abbreviation for the unit of measure listed below.

G = Gallons (liquids only)	L = Liters (liquids only)
P = Pounds	K = Kilograms
T = Tons (2000 lbs.)	M = Metric tons (1000 kg)
Y = Cubic yards	N = Cubic meters

Item 15. The generator may use this space to indicate special transportation, treatment, disposal information. Import/Export information as noted in the "International Shipment" section is to be recorded here.

Item 16. The generator must read, print his/her name, sign and date the certification statement.

Item 17. Print the name of the person accepting the waste on behalf of the first transporter. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

Item 18. If applicable, print the name of the person accepting the waste on behalf of the second transporter. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

Item 19. An authorized representative of the designated (or alternate) facility must note in this space any discrepancy in the waste shipment.

Item 20. Print the name of the person accepting the waste on behalf of the designated facility. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

NOTE: MDEQ "Rejected Load Procedures" provides guidance for partial or total load rejections.

Only the following information in the shaded area is a State of Michigan requirement:

Item A. A preprinted State manifest document number.

Item B - H. May be required by other states.

Item I. For hazardous wastes, enter the appropriate waste numbers found in R299.9212 through R299.9214 of Part 111 and 40 CFR 261 Subparts C and D. If more than one waste number is required to appropriately identify the waste, enter the additional numbers in Item J. In selecting the most appropriate waste number the following hierarchy must be used: acute waste (including P and acute F), U (toxic), K (specific sources), non-acute F (non-specific sources) and D (characteristic). State regulated wastes follow the same hierarchy as federally regulated wastes. For Part 121 wastes which are not hazardous wastes enter the appropriate code listed below.

Mixed Solvents	007L	Storm Sewer Cleanouts	031L
Pharmaceutical	014L	Sanitary Sewer Cleanouts	032L
Crankcase Oil	017L	X-Ray/Photo Solutions	033L
Coolants and Water Soluble Oils	019L	Water Based Cleaning Solutions	034L
Other Oil (Describe in Item 11 or Item J)	021L	Car Wash Sludges	035L
Brine	022L	Grease Trap Wastes	036L
PCB	026L		
Other Wastes (Describe in Item 11 or Item J)	029L		
Antifreeze	030L		

Item J. Generators are to use this space for the site address if different from the mailing address noted in Item 3, additional waste codes, additional description for a Part 121 waste as noted in Item I of these instructions, approval of commingling authority as required in R299.9304(6).

Item K. List any specific codes which apply.

Burned for Energy Recovery	B
Conditionally Exempt Small Quantity Generator	C
Emergency Response Cleanup	E
Household Generated	H
Recycled Precious Metals	P
Recycled, Reclaimed, Used or Reused	R
Universal Waste	U

INTERNATIONAL SHIPMENTS

Exports- Transporters must sign and enter the date the waste leaves the United States in Item 15. The primary exporter must identify the point of departure from the United States.*

Imports- Shipments of hazardous and Part 121 regulated wastes must be accompanied by a U.S. EPA Uniform Hazardous Waste Manifest. Any person functioning as the U.S. Importer, as defined in Part 111, must complete the manifest as required in R299.9310*

*Transporters of hazardous waste shipments must deliver a copy of the manifest to U.S. Customs when importing or exporting the waste across U.S. borders. Record the foreign waste manifest document number in Item J.

MANIFEST DISTRIBUTION

GENERATOR: Upon placing the waste into transportation (first transporter signs and dates manifest) remove the white and gold banded copies and give the remainder of the manifest copies to the transporter. Sent the white copy to MDEQ no later than the tenth day of the month following the shipment. For shipments of wastes being transported to a designated facility outside of Michigan when an out-of-state manifest is used, mail to the MDEQ a photocopy of the manifest when the shipment is placed into transportation and mail a photocopy of the second generator manifest copy, when received.

TRANSPORTER: Upon delivery to the designated (or alternate) facility, and that facility signs and dates the manifest, the canary banded copy will be returned to you. If more than one transporter is used, the manifest is to be copied and supplied to the previous transporter acknowledging the receipt of the shipment by the next transporter. The canary banded copy stays with the manifest until the shipment reaches the designated facility.

DESIGNATED FACILITY: Upon signing and dating the manifest as received, give the canary banded

ADDRESS ALL MDEQ MANIFEST COPIES TO:
WASTE MANAGEMENT DIVISION
MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
PO BOX 30038
LANSING MI 48909-7538

The public reporting burden for this collection of information is estimated to average 31 minutes for generators, 15 minutes for transporters, and 16 minutes for treatments, storage and disposal facilities. The record-keeping burden per response for this collection of information is estimated to average 6 minutes for generators, 6 minutes for transporters, and 6 minutes for treatment, storage and disposal facilities. The burden associated with reading the regulations is estimated at 1 hour and 15 minutes annually. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency.

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB numbers for EPA's regulations are listed in 40 CFR Part 9 and 48 CFR Chapter 15. Send comments regarding these burden statements or any other aspect of this collection, including suggestions for reducing the burden, including through use of automated collection techniques to the Director, OPPE Regulatory Information Division, U.S. Environmental Protection Agency (2.37), 401 M St. S.W., Washington, D.C., 20460 and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Attention: Desk Officer for EPA, 725 17th Street, N.W., Washington, D.C. 20503. Include the OMB control number in any correspondence.

MI0012869

CERTIFICATE OF DISPOSAL

This certificate is to verify the wastes specified on Manifest # M19757379

have been properly disposed of in accordance with all local, state and federal regulations.

"Disposed of" means either: 1) Burial or 2) Processed as specified in 40 CFR et seq.

FACILITY NAME: *(Please check one)*

☒ Michigan Disposal Waste Treatment Plant (EPA I.D. # MID000724831)

☐ Wayne Disposal, Inc. (EPA I.D. # MID048090633)

ADDRESS: 49350 N. I-94 Service Drive
Belleville, Michigan 48111

PHONE NUMBER: 1-800-592-5489

FAX NUMBER: 1-800-592-5329

Authorized Signature: _____

THE ENVIRONMENTAL QUALITY COMPANY 49350 N. I-94 SERVICE DRIVE BELLEVILLE MICHIGAN 48111

FORM1020 (3/96)

Environmental Management Alternatives, Inc.

INVOICE

EMA

10627 Midwest Industrial Blvd.
St. Louis, MO 63132
Phone 314-785-6425 Fax 314-785-6426

DATE: 10/31/2004
INVOICE # 99947-wgim

Bill To:
Wolverine Gasket Division
Attn: Accounts Payable
2638 Princess
Inkster, MI 48141

Purchase Order No.

Project ID: Wolverine Gasket Remediation

TERMS
Net 30

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
727.1	Excavation, Transport and Disposal of Non-Haz Soil	48.00	$ 34,900.80
1	4 Cubic Yard Loader	2,500.00	$ 2,500.00
2	Delivery / Pick-UP of Loader	200.00	$ 400.00
1	Demolition and Removal of Storage Tanks	4,500.00	$ 4,500.00
		TOTAL	$ 42,300.80

Make all checks payable to Environmental Management Alternatives, Inc.
If you have any questions concerning this invoice, contact Cynthia Ortega at 314-785-6425 or cortega@ema-env.com

THANK YOU FOR YOUR BUSINESS!

CONESTOGA-ROVERS
& ASSOCIATES

2055 Niagara Falls Blvd., Suite #3, Niagara Falls, NY 14304
Telephone: 716-297-6150 Facsimile: 716-297-2265
www.CRAworld.com

EaglePicher Automotive
Wolverine Gasket Division
2424 John Daly Road
Inkster, MI. 48141

Invoice #: 56074
Project: 037248
Project Name: Eagle-Wolverine Gasket-Soil Removal
Invoice Group: **
Invoice Date: 1/11/2005
Purchase Order:

Attention: Doug Rommeck

TERMS: Net 30 Days. Service Charge of 1½% per month payable on overdue accounts.

For Professional Services Rendered through: 12/26/2004

Professional Fees		
Professional Fees	4,384.25	
Total Professional Fees		4,384.25
Expenses		
Regular Expenses	652.37	
Unit Pricing	657.24	
Total Expenses		1,309.61
Amount Due This Invoice **		**5,693.86**

Tom Kinney

REMITTANCE ADDRESS
Conestoga-Rovers & Associates, Inc.
Department 406
P.O. Box 8000
Buffalo, NY 14267

EQUAL EMPLOYMENT OPPORTUNITY EMPLOYER

Project : 037248 -- Eagle-Wolverine Gasket-Soil Removal 10/27/05 is the last day of soil excavation **Invoice # : 56074**

Phase : ** -- Eagle-Wolverine Gasket-Soil Removal**

3:00 10/27/05 last load

Professional Fees

Class / Employee Name	*Date*	*Hours*	*Rate*	*Amount*
Chemist B1				
Blaise Blastos				
Inject Related	09/23/2004	0.50	76.00	38.00
	10/25/2004	0.50	76.00	38.00
	12/06/2004	0.50	76.00	38.00
Chemist C1				
Kathleen Shaw Inject Related				
	09/24/2004	1.00	84.00	84.00
Draft/CADD/Graphics B3				
LeAnn Forche				
	12/08/2004	1.50	59.00	88.50
Draft/CADD/Graphics C3				
David Coss Inject Related				
	10/01/2004	1.50	68.00	102.00
	12/08/2004	0.50	68.00	34.00
Engineer B3				
Ben Holly				
	09/28/2004	0.50	79.00	39.50
Geologist/Hydrogeo. E2				
Tom Kinney				
	09/23/2004	1.00	136.00	136.00
	10/08/2004	0.50	136.00	68.00
	10/12/2004	0.50	136.00	68.00
	10/20/2004	0.50	136.00	68.00
Inject	10/25/2004	1.00	136.00	136.00
	10/26/2004	1.00	136.00	136.00
	10/27/2004	0.50	136.00	68.00
	12/10/2004	0.50	136.00	68.00
Industrial Hyg. B				
William Doyle				
	10/22/2004	1.00	78.00	78.00
Office Clerk A1				
Patsy Parks				
	11/16/2004	0.50	44.00	22.00
	12/10/2004	1.50	44.00	66.00
Final	12/14/2004	1.50	44.00	66.00
Purchasing/Maintenance A3				
Patricia Butler				
	10/25/2004	1.00	44.00	44.00
Tech. B1				
Ben Fruchey				
	09/22/2004	2.00	67.00	134.00
	09/23/2004	2.50	67.00	167.50
	09/24/2004	0.50	67.00	33.50
	10/25/2004	6.50	67.00	435.50
Start inject	10/26/2004	9.50	67.00	636.50
	10/27/2004	4.00	67.00	268.00
	11/23/2004	0.50	67.00	33.50
	12/08/2004	3.50	67.00	234.50
Mis upon map	12/10/2004	5.00	67.00	335.00
	12/14/2004	0.50	67.00	33.50
Tech. B2				
Steven Young				
	10/28/2004	2.00	67.00	134.00
Inject	11/23/2004	1.00	67.00	67.00
	11/24/2004	1.00	67.00	67.00

MI0012872

Phase : * -- Eagle-Wolverine Gasket-Soil Removal***

Professional Fees

Class / Employee Name	*Date*	*Hours*	*Rate*	*Amount*
Word Process/Secretary A3				
Emily Beeton				
	10/05/2004	4.50	51.00	229.50
Ramona Rowsey				
	09/23/2004	0.25	51.00	12.75
	10/28/2004	0.25	51.00	12.75
	12/14/2004	0.25	51.00	12.75
Word Process/Secretary E3				
Betty Kniceley				
	12/03/2004	0.50	51.00	25.50
	12/16/2004	0.50	51.00	25.50
		Total Professional Fees		***4,384.25***

318.75

Regular Expenses

Vendor Name	*Doc Nbr*	*Date*	*Cost*	*Multiplier*	*Amount*
Subs: Laboratory					
Lab Expenses					
Severn Trent Laboratories,	400317578	10/20/2004 Analytical	224.48	1.00	224.48
		Total: Lab Expenses			224.48
Project Purchases					
Delivery					
FedEx	400313042	10/04/2004 Express Mail	42.92	1.00	42.92
	400318292	11/03/2004 express mail	24.58	1.00	24.58
		Total: Delivery			67.50
Field Supplies/Services					
Industrial Environmental	400318787	11/02/2004 10/26-11/01 RENTAL: MSA Draeger Pump	86.00	1.00	86.00
		Total: Field Supplies/Services			86.00
Employee Project Expenses					
Transportation					
Ben Fruchey	400315492	10/29/2004 Fuel	31.69	1.00	31.69
	400315492	10/25/2004 Fuel	35.00	1.00	35.00
	400317171	11/03/2004 Rental Truck	169.95	1.00	169.95
		Total: Transportation			236.64
Field Supplies/Services					
Ben Fruchey	400315492	10/27/2004 Field Supplies	9.53	1.00	9.53
	400315492	10/28/2004 Field Supplies	5.80	1.00	5.80
	400315492	10/27/2004 Field Supplies	11.00	1.00	11.00
	400301803	09/23/2004 Field Supplies	5.29	1.00	5.29
	400301803	09/23/2004 Field Supplies	6.13	1.00	6.13
		Total: Field Supplies/Services			37.75
		Total Regular Expenses			***652.37***

Unit Pricing Expenses

Vendor / Employee Name	*Doc Nbr*	*Date*	*Units*	*Cost*	*Multiplier*	*Amount*

MI0012873

Phase : ** -- Eagle-Wolverine Gasket-Soil Removal**

Unit Pricing Expenses

Vendor / Employee Name	*Doc Nbr*	*Date*	*Units*	*Cost*	*Multiplier*	*Amount*
Information Technology Charges						
Information Technology						
Information Technology Information Technology - US	51052	10/31/2004	34.75	2.500	1.00	86.88
Information Technology - US	49630	09/30/2004	8.25	2.500	1.00	20.63
Information Technology - US	53889	12/26/2004	16.25	2.500	1.00	40.63
Information Technology - US	52647	11/28/2004	3.00	2.500	1.00	7.50
		Total:	Information Technology			155.64
Personal Vehicle Expenses						
Personal Vehicle Mileage						
Patsy Parks Employee Vehicle - Miles	52982	11/30/2004 Mileage- 11/16/04	4.00	0.375	1.00	1.50
Emily Beeton Employee Vehicle - Miles	52709	11/17/2004 Mileage	4.00	0.375	1.00	1.50
		Total:	Personal Vehicle Mileage			3.00
Equipment/Supplies Charges						
Field Supplies/Services						
Field Supplies CRA Field Supplies	49650	09/23/2004	74.60	1.000	1.00	74.60
CRA Field Supplies	50951	10/26/2004	24.00	1.000	1.00	24.00
		Total:	Field Supplies/Services			98.60
Field Supplies/Services						
Field Equipment First Aid Kit	50947	10/26/2004	1.00	20.000	1.00	20.00
		Total:	Field Supplies/Services			20.00
Field Supplies/Services						
Field Equipment Monitor,PID,HNu,Microtip, Minirae,Photon, 20-20	54249	11/01/2004	3.00	90.000	1.00	270.00
Monitor,PID,HNu,Microtip, Minirae,Photon, 20-20	49638	09/23/2004	1.00	90.000	1.00	90.00
		Total:	Field Supplies/Services			360.00
Field Supplies/Services						
Field Equipment Fire Extinguisher	50947	10/26/2004	1.00	20.000	1.00	20.00
		Total:	Field Supplies/Services			20.00
		Total Unit Pricing				***657.24***

Total Phase : ** -- Eagle-Wolverine Gasket-Soil Removal**

Labor :	**4,384.25**
Expense :	**1,309.61**
Total :	**5,693.86**

Total Project: 037248 -- Eagle-Wolverine Gasket-Soil Removal **5,693.86**

MI0012874

SEVERN TRENT STL

Invoice

STL N Canton
4101 Shuffel Drive NW
North Canton,OH 44720
Tel: (330) 497-9396
Fax: (330) 497-0772 FAX

Number	Date
24072119	20 OCT 04
STL Project Number: A4I240399	Customer Number: 00057787
Terms: NET 30 DAYS	

REMIT TO:
Severn Trent Laboratories, Inc.
P.O. Box 7777 W4305
Philadelphia, PA 19175-4305

Customer Contact
SAMPLE RECEIVING DATE : 9/24/04
REPORT DATE : 10/19/04
Paul Wiseman

Bill To:
Paul Wiseman
Conestoga Rovers & Assoc., Inc
14496 Sheldon Rd Suite 200
Plymouth,MI 48170

Conestoga Rovers & Assoc., Inc
14496 Sheldon Rd Suite 200
Plymouth,MI 48170

Line No.	Qty.	Matrix Code	Analysis Description	Unit Price	Extended Price
	2	SOLID	SOLID, 160.3 MODIFIED, Total Solids	.00	
	2	SOLID	SOLID, 1312, SPLP ZHE VOC Prep	40.00	80.00
	2	SOLID	SOLID, SPLP VOC, 1312/8260B	82.00	164.00
					244.00
			8% Extended TAT discount		19.52

APPROVAL OF INVOICE
PROJECT # 37248
DATE 11/2/04
SIGN/INIT T.L
soc # Q2-4
TYPE ☐ OFFICE ☐ FIELD SUPPLY
☐ LAB ☐ SUB. CONL
☐ 406372

OCT 21 2004

RECEIVED
NOV 4 2004
ACCOUNTING

NOTE: Applicable samples will be stored at no extra charge for a period of 30 days following the final report. Samples will be properly disposed of after 30 days, unless notified otherwise in writing.

Please reference Invoice number when remitting.

Customer P.O. Number / Contract Number / Reference
/37248/EAGLE PICHER/WOLVERINE GA

STL Project Manager: Kenneth J. Kuzior
Salesperson:

Sub Total	
Tax	
Total	224.48

ORIGINAL
Severn Trent Laboratories, Inc.

MI0012875

CONESTOGA-ROVERS
& ASSOCIATES

14496 Sheldon Road, Suite #200, Plymouth, MI 48170
Telephone: 734-453-5123 Facsimile: 734-453-5201
www.CRAworld.com

September 13, 2004

Reference No. 37248

Mr. Doug Rommeck
EaglePicher Automotive
2424 John Daly Road
Inkster, Michigan 48141

Dear Mr. Rommeck:

Re: Soil Removal Oversight
EaglePicher Automotive
Wolverine Gasket Division
Inkster, Michigan

Conestoga-Rovers & Associates (CRA) is providing this Proposal for Professional Services (Proposal) to provide third party field oversight associated with the removal of soil from the soil pile for EaglePicher Automotive (EaglePicher) for the facility located at 2638 Princess St. in Inkster, Michigan (Site). This proposal describes the recommended scope of work and cost estimate to provide third party oversight of the soil removal activities.

This Proposal is presented in the following titled sections:

Section 1.0 Scope of Work
Section 2.0 Cost Estimate
Section 3.0 Schedule

1.0 SCOPE OF WORK

CRA will collect a composite soil sample from the upper 2-1/2 feet of the soil pile for laboratory analysis of SPLP VOCs. EaglePicher's contractor will remove approximately 2 to 2-1/2 half feet of soil from the top of the soil pile (up to 450 yards) and stockpile this soil on-Site to be used as backfill at a later time. The goal is to obtain approximately 450 yards of relatively clean soil that can be used to fill the final excavation back to grade. The stockpiled soil should have a liner both above and below it to prevent any possible cross-contamination across the site.

EaglePicher's contractor will then excavate the remainder of the soil pile and to a depth of 2 feet directly beneath the pile (total of approximately 700 yards). The soil that is being excavated will be screened for impact using field observations including, at a minimum, visual, olfactory, monitoring with a PID, and a chlorobenzene specific field test (drager tube). CRA will use historical analytical results and field observations to assess whether the soil may be hazardous.

If field monitoring indicates potentially characteristic hazardous soils may be present, EaglePicher will be notified and the potentially hazardous soils will be segregated.

EaglePicher's contractor will load, transport, and dispose of the soil. EaglePicher's contractor will backfill the open excavation with the stockpiled soil, obtained from the top 2 to 2-1/2 feet of the original soil pile, assuming the SPLP VOC results are below applicable MDEQ Part 201 Industrial criteria.

CRA will perform field monitoring, documentation, and reporting. CRA will prepare a Memorandum for EaglePicher summarizing the field activities and analytical results, and include copies of waste manifests and landfill receipts.

2.0 COST ESTIMATE

The estimated project costs are included below. CRA will invoice EaglePicher on a time and materials, not to exceed basis. CRA's cost estimate is based on five days of field oversight.

CRA Costs

• Field Oversight and Project Management	$4,500
• Lab Costs	$500
• Field Equipment, Truck Rental, Air Monitoring Equipment	$1,500
• Memorandum Preparation	$500
Total CRA Costs	$7,000.00

The rate for CRA's field technician will be $67 / hour.

3.0 SCHEDULE

CRA will commence the Services described above upon written acceptance of this Proposal. It is anticipated that the soil excavation and removal activities can be completed within one week.

CONESTOGA-ROVERS
& ASSOCIATES

We appreciate the opportunity to present this Proposal to EaglePicher. Please feel free to contact the undersigned at (734) 453-5123 should you require clarification or further information on any aspect of this Proposal.

Yours truly,

CONESTOGA-ROVERS & ASSOCIATES

Thomas M. Kinney

Thomas M. Kinney, CPG

TK/eb/1/PR/Det.

c.c.: Tom Johnson, CRA
Fred Blickle, CRA

MI0012878

CONESTOGA-ROVERS
& ASSOCIATES

14496 Sheldon Road, Suite #200, Plymouth, MI 48170
Telephone: 734-453-5123 Facsimile: 734-453-5201
www.CRAworld.com

September 13, 2004 Reference No. 37248

Mr. Doug Rommeck
EaglePicher Automotive
2424 John Daly Road
Inkster, Michigan 48141

Dear Mr. Rommeck:

Re: Soil Removal Oversight
EaglePicher Automotive
Wolverine Gasket Division
Inkster, Michigan

Conestoga-Rovers & Associates (CRA) is providing this Proposal for Professional Services (Proposal) to provide third party field oversight associated with the removal of soil from the soil pile for EaglePicher Automotive (EaglePicher) for the facility located at 2638 Princess St. in Inkster, Michigan (Site). This proposal describes the recommended scope of work and cost estimate to provide third party oversight of the soil removal activities.

This Proposal is presented in the following titled sections:

Section 1.0 Scope of Work
Section 2.0 Cost Estimate
Section 3.0 Schedule

1.0 SCOPE OF WORK

CRA will collect a composite soil sample from the upper 2-1/2 feet of the soil pile for laboratory analysis of SPLP VOCs. EaglePicher's contractor will remove approximately 2 to 2-1/2 half feet of soil from the top of the soil pile (up to 450 yards) and stockpile this soil on-Site to be used as backfill at a later time. The goal is to obtain approximately 450 yards of relatively clean soil that can be used to fill the final excavation back to grade. The stockpiled soil should have a liner both above and below it to prevent any possible cross-contamination across the site.

EaglePicher's contractor will then excavate the remainder of the soil pile and to a depth of 2 feet directly beneath the pile (total of approximately 700 yards). The soil that is being excavated will be screened for impact using field observations including, at a minimum, visual, olfactory, monitoring with a PID, and a chlorobenzene specific field test (drager tube). CRA will use historical analytical results and field observations to assess whether the soil may be hazardous.

If field monitoring indicates potentially characteristic hazardous soils may be present, EaglePicher will be notified and the potentially hazardous soils will be segregated.

EaglePicher's contractor will load, transport, and dispose of the soil. EaglePicher's contractor will backfill the open excavation with the stockpiled soil, obtained from the top 2 to 2-1/2 feet of the original soil pile, assuming the SPLP VOC results are below applicable MDEQ Part 201 Industrial criteria.

CRA will perform field monitoring, documentation, and reporting. CRA will prepare a Memorandum for EaglePicher summarizing the field activities and analytical results, and include copies of waste manifests and landfill receipts.

2.0 COST ESTIMATE

The estimated project costs are included below. CRA will invoice EaglePicher on a time and materials, not to exceed basis. CRA's cost estimate is based on five days of field oversight.

CRA Costs

- Field Oversight and Project Management $4,500
- Lab Costs $500
- Field Equipment, Truck Rental, Air Monitoring Equipment $1,500
- Memorandum Preparation $500

Total CRA Costs $7,000.00

The rate for CRA's field technician will be $67 / hour.

3.0 SCHEDULE

CRA will commence the Services described above upon written acceptance of this Proposal. It is anticipated that the soil excavation and removal activities can be completed within one week.

We appreciate the opportunity to present this Proposal to EaglePicher. Please feel free to contact the undersigned at (734) 453-5123 should you require clarification or further information on any aspect of this Proposal.

Yours truly,

CONESTOGA-ROVERS & ASSOCIATES

Thomas M. Kinney

Thomas M. Kinney, CPG

TK/eb/1/PR/Det.

c.c.: Tom Johnson, CRA
Fred Blickle, CRA

ENVIRONMENTAL
MANAGEMENT
ALTERNATIVES

10627 Midwest Industrial Blvd.
St Louis, MO 63132
Phone: (314) 785-6425
Fax: (314) 785-6426

August 24, 2004

Mr. Doug Rommeck
Wolverine Gasket Division
2638 Princess Street
Inkster, MI 48141

Via E-Mail: doug.rommeck@eaglepicher

Dear Doug:

Environmental Management Alternatives, Inc. (EMA) is pleased to offer the following proposal of services at the Wolverine Facility in Inkster, MO:

Scope of Work

All labor, materials, equipment, transportation and disposal associated with the loading of approximately 500 cubic yards (700 tons) of Soil and Concrete that will be managed as Non-Hazardous/Special Waste at EQ in Belleville, MI. Initially, we will skim the first two feet of soil and set it aside for backfill. We will then load the contaminated load the soil into dump trailers with an excavator. Once the contaminated soil is loaded, we will backfill with the soil that we set aside. The soil will be compacted with the excavator and a load of top soil will be spread over the former excavation in order to properly vegetate the area.

Non-Hazardous Estimate

$48.00 per ton (estimated 700 tons)

Project Cost:	**$33,600.00 (based on 700 tons)**
200 Track Excavator	**$2,500.00**
Dirt Backfill:	**$18.00/yard (if necessary)**
SCS 100:	**$1,300.00 per 55 gallon drum (vapor suppression)**

ENVIRONMENTAL
MANAGEMENT
ALTERNATIVES

Hazardous Unit Cost

Characteristic Waste Below Subpart CC	**$152.00 per ton***
Characteristic for Chemical Oxidation Subpart CC:	**$325.00 per ton****

* **Waste is above UTS but below Subpart CC Regulations of 500ppm VOC's for TCLP**

** **Waste is above UTS and above Subpart CC Regulations**

Based on the analysis that I have, I do not see any waste being above Subpart CC.

Personnel

Project Manager
1-Hazardous Materials Operators

Equipment

Front End Loader
Skid Steer (if necessary)

Please note that the above unit rates are turn-key prices. The unit pricing includes labor, equipment, materials, transportation, disposal and the preparation of all special waste manifests. ***There is one load of topsoil/backfill included in this cost.***

Thank you for the opportunity to submit this proposal on behalf of EMA. We look forward to working with you and Wolverine Gasket to make this a successful project. If you have any questions or need additional information, please contact me at 314-518-9367.

Respectfully,

Dan Giesler

MI0012883

CONESTOGA-ROVERS
& ASSOCIATES

14496 Sheldon Road, Suite #200, Plymouth, MI 48170
Telephone: 734-453-5123 Facsimile: 734-453-5201
www.CRAworld.com

August 20, 2004

Reference No. 35298

Mr. Doug Rommeck
EaglePicher Automotive
2424 John Daly Road
Inkster, Michigan 48141

Dear Mr. Rommeck:

Re: Soil Removal
EaglePicher Automotive
Wolverine Gasket Division
Inkster, Michigan

Conestoga-Rovers & Associates (CRA) is providing this Proposal for Professional Services (Proposal) to remove soil from the soil pile for EaglePicher Automotive (EaglePicher) for the facility located at 2638 Princess St. in Inkster, Michigan (Site). This proposal describes the recommended scope of work and cost estimate to remove contaminated soil from the Site to an off-site location for disposal.

This Proposal is presented in the following titled sections:

Section 1.0 Scope of Work
Section 2.0 Cost Estimate
Section 3.0 Schedule

1.0 SCOPE OF WORK

EQ will remove approximately 2 to 2-1/2 half feet of soil from the top of the soil pile (up to 450 yards) and stockpile this soil on-Site to be used as backfill at a later time. The soil that is being excavated from the top of the pile will be screened for impact using field observations including visual, olfactory, monitoring with a PID. CRA will make a field call as to whether the soil is suitable for backfill or not based on these field observations. The goal is to obtain approximately 450 yards of relatively clean soil that can be used to fill the final excavation back to grade. The stockpiled soil should have a liner both above and below it to prevent any possible cross-contamination across the site. CRA will collect a composite soil sample from the soil pile for Laboratory analysis of SPLP VOCs.

EQ will then excavate the remainder of the soil pile and to a depth of 2 feet directly beneath the pile (total of approximately 700 yards). EQ will load, transport, and dispose of the soil. EQ will

backfill the hole with the stockpiled soil, obtained from the top two feet of the original soil pile, at a later date.

CRA will be responsible for project oversight, monitoring, documentation, and reporting. CRA will prepare a Memorandum for EaglePicher summarizing the field activities and analytical results, and include copies of waste manifests and landfill receipts.

2.0 COST ESTIMATE

The estimated project costs are included below. CRA understands that EaglePicher will contract directly with EQ for their expenses incurred. The costs included in this proposal are based on standard estimating assumption and may vary from the actual costs incurred. The costs assume that the soil will weigh 1.5 tons per cubic yard and is non-hazardous.

EQ Costs

- Disposal of Soil: $18.00 per ton x 1,050 Tons = $18,900
- Transportation of Soil: $10.00 per ton x 1,050 Tons = $10,500
- Excavation and Loading of Soil: $6.00 per ton x 1,050 Tons = $6,300
- Excavation, Stockpile/Backfill top soil pile: $14.00 per ton x 675 Tons = $9,450

Total EQ Costs $45,150.00

CRA Costs

- Field Oversight and Project Management: $4,500
- Lab Costs: $500
- Field Equipment, Truck Rental, Air Monitoring Equipment : $1,500
- Memorandum Preparation: $500

Total CRA Costs $7,000.00

Total Costs

The cost for the entire project is the sum of the cost from EQ and CRA.

Estimated Total Cost for Project $52,150.00

Contingencies

CRA recommends a 10% contingency to the total cost of the project due to unforeseen events (e.g. weather, soil heavier than 1.5 tons/cubic yard, etc.).

Potential Total cost (including 10% for contingencies) $57,414.50

CONESTOGA-ROVERS
& ASSOCIATES

CRA will bill EaglePicher on a time and materials, not to exceed basis. CRA's cost estimate for our services, without a contingency is $7,000.00.

3.0 SCHEDULE

CRA will commence the Services described above upon written acceptance of this Proposal. It is anticipated that the soil excavation and removal activities can be completed within one week. The backfilling would take place at a later date and would take an additional day.

We appreciate the opportunity to present this Proposal to EaglePicher. Please feel free to contact the undersigned at (734) 453-5123 should you require clarification or further information on any aspect of this Proposal.

Yours truly,

CONESTOGA-ROVERS & ASSOCIATES

Thomas Kinney

Thomas M. Kinney, CPG

TK/bw/1/PR/Det.

c.c.: Tom Johnson, CRA
Fred Blickle, CRA

MI0012886

EMA
ENVIRONMENTAL MANAGEMENT ALTERNATIVES

10627 Midwest Industrial Blvd.
St. Louis, MO 63132
(888) 741-6425

Service Receipt 001

Job #:

Customer: EAGLE PICHER
Cust. Contact: D ROMMECK
Cust. Phone: 313 562 6400
Location: 7638 PRINCESS ST
Unit: INKSTER MI
Date: SUN 10/24/04
Customer Work Order #:
Work Performed:
Customer P.O. #/Reg. #

☐ Hydrobalst ☐ Vacuum ☐ Chemical ☐ Shop Other MOB

EQUIPMENT

Time In	Time Out	Hours	Unit #	Description	Mileage	Description
: AM PM	: AM PM			F250		
: AM PM	: AM PM					
: AM PM	: AM PM					
: AM PM	: AM PM					
: AM PM	: AM PM					
: AM PM	: AM PM					
: AM PM	: AM PM					

LABOR

Time In	Time Out	Hours	Class	Name	Travel	Per Diem	Deduct
12:00 AM PM	8:00 AM PM	8	PM	J COSMANO ✓			
12:00 AM PM	8:00 AM PM	8	OP	K NORICE ✓			
: AM PM	: AM PM						
: AM PM	: AM PM						
: AM PM	: AM PM						

CHEMICAL/SUPPLIES/MISCELLANEOUS

Description	Quantity	Unit of Measure	Description	Quantity	Unit of Measure
FUEL (F250) ✓		GAL			
FUEL (F250) ✓		GAL			
FAIRFIELD ✓	2	ROOM			
PERDIEM ✓	2	30.00			

Job Notes:

Final Service Receipt for job? ☐ Yes ☐ No

The work is completed, the equipment is operating properly, the workspace is properly cleaned and there are no new hazards as a result of this work.

Customer's Signature _____ Prepared by: _____

1. Standard Rates are for work performed between the hours of 8AM to 5PM Monday through Friday
2. Overtime Rates will be charged from 5PM to 8PM Monday through Friday and all day Saturday
3. Sunday and Holidays will be billed at Double Time.
4. Minimum Daily Charge will be one-half day
5. EMA makes no guarantees with respect to the completeness of the washing process or the complete elimination of all residue and moisture. INSPECTION of the vessel is agreed to remain the RESPONSIBILITY OF THE customer and they do hereby relieve and discharge EMA of any responsibility, claims and demands of any kind whatsoever by any person for damages as a result of alleged improper or incomplete cleaning of the vessel. I HAVE READ AND UNDERSTAND THE ABOVE CONDITIONS.

White Copy: Invoicing Yellow Copy: Division Copy Pink Copy: Customer Copy

EMA
ENVIRONMENTAL MANAGEMENT ALTERNATIVES

10627 Midwest Industrial Blvd.
St. Louis, MO 63132
(888) 741-6425

Service Receipt 002

Job #:

Customer: EAGLE PICHER
Cust. Contact: D ROMMECK
Cust. Phone: 313 562 6400
Location: 2638 PRINCESS ST
Unit: INKSTER MI
Date: MON 10/25/04
Customer Work Order #:
Work Performed: REMOVE PRODUCT LINES; EXCAVATE OB
Customer P.O. #/Reg. #

☐ Hydrobalst ☐ Vacuum ☐ Chemical ☐ Shop Other

EQUIPMENT

Time In	Time Out	Hours	Unit #	Description	Mileage	Description
: AM PM	: AM PM			F250		
: AM PM	: AM PM			JD 230C LC		
: AM PM	: AM PM			JD 624J		
: AM PM	: AM PM					
: AM PM	: AM PM					
: AM PM	: AM PM					
: AM PM	: AM PM					

LABOR

Time In	Time Out	Hours	Class	Name	Travel	Per Diem	Deduct
7:30 AM PM	6:00 AM PM	10.5	PM	J COSMANO			
7:30 AM PM	6:00 AM PM	10.5	OP	K MORICE			
: AM PM	: AM PM						
: AM PM	: AM PM						
: AM PM	: AM PM						

CHEMICAL/SUPPLIES/MISCELLANEOUS

Description	Quantity	Unit of Measure	Description	Quantity	Unit of Measure
HOME DEPOT ✓					
			PER DIEM ✓	2	30.00
			FAIRFIELD ✓	2	ROOM

Job Notes: 230 NOT ON SITE UNTIL 1:45 PM; REMOVED PRODUCT LINES FROM TANK FARM TO REMEDIAL BLDG; REMOVED/STOCKPILED OB

Final Service Receipt for job? ☐ Yes ☐ No

The work is completed, the equipment is operating properly, the workspace is properly cleaned and there are no new hazards as a result of this work.

Customer's Signature _____ Prepared by: _____

. Standard Rates are for work performed between the hours of 8AM to 5PM Monday through Friday
. Overtime Rates will be charged from 5PM to 8PM Monday through Friday and all day Saturday
. Sunday and Holidays will be billed at Double Time.
. Minimum Daily Charge will be one-half day
. EMA makes no guarantees with respect to the completeness of the washing process or the complete elimination of all residue and moisture. INSPECTION of the vessel is agreed to remain the RESPONSIBILITY OF THE customer and they do hereby relieve and discharge EMA of any responsibility, claims and demands of any kind whatsoever by any person for damages as a result of alleged improper or incomplete cleaning of the vessel. I HAVE READ AND UNDERSTAND THE ABOVE CONDITIONS.

White Copy: Invoicing Yellow Copy: Division Copy Pink Copy: Customer Copy

EMA
ENVIRONMENTAL MANAGEMENT ALTERNATIVES

10627 Midwest Industrial Blvd.
St. Louis, MO 63132
(888) 741-6425

Service Receipt 003

Job #:

Customer: EAGLE PICHER
Cust. Contact: D ROMMECK
Cust. Phone: 313 562 640
Location: 2638 PRINCESS ST
Unit: INKSTER MI
Date: TUE 10/26/04
Customer Work Order #:
Work Performed: EXCAVATE / LOAD SOLVENT CONT. S
Customer P.O. #/Reg. #
FINISH PRODUCT LINE REMOVAL
REMOVATION START CUTTING TANKS

☐ Hydrobalst ☐ Vacuum ☐ Chemical ☐ Shop Other

EQUIPMENT

Time In	Time Out	Hours	Unit #	Description	Mileage	Description
: AM PM	: AM PM			F250		
: AM PM	: AM PM			JD 230C LC		
: AM PM	: AM PM			JD 624J		
: AM PM	: AM PM					
: AM PM	: AM PM					
: AM PM	: AM PM					
: AM PM	: AM PM					

LABOR

Time In	Time Out	Hours	Class	Name	Travel	Per Diem	Deduct
630 AM PM	6:00 AM PM	11.5	PM	J COSMANO			
630 AM PM	6:00 AM PM	11.5	OP	K MORICE			
: AM PM	: AM PM						
: AM PM	: AM PM						
: AM PM	: AM PM						

CHEMICAL/SUPPLIES/MISCELLANEOUS

Description	Quantity	Unit of Measure	Description	Quantity	Unit of Measure
EQ HAULING		HOUR			
EQ DISPOSAL		TON			
			PER DIEM ✓	2	30.00
			FARFIELD ✓	2	Room

Job Notes:

Final Service Receipt for job? ☐ Yes ☐ No

The work is completed, the equipment is operating properly, the workspace is properly cleaned and there are no new hazards as a result of this work.

Customer's Signature _____ Prepared by: _____

1. Standard Rates are for work performed between the hours of 8AM to 5PM Monday through Friday
2. Overtime Rates will be charged from 5PM to 8PM Monday through Friday and all day Saturday
3. Sunday and Holidays will be billed at Double Time.
4. Minimum Daily Charge will be one-half day
5. EMA makes no guarantees with respect to the completeness of the washing process or the complete elimination of all residue and moisture. INSPECTION of the vessel is agreed to remain the RESPONSIBILITY OF THE customer and they do hereby relieve and discharge EMA of any responsibility, claims and demands of any kind whatsoever by any person for damages as a result of alleged improper or incomplete cleaning of the vessel. I HAVE READ AND UNDERSTAND THE ABOVE CONDITIONS.

White Copy: Invoicing Yellow Copy: Division Copy Pink Copy: Customer Copy

EMA
ENVIRONMENTAL MANAGEMENT ALTERNATIVES

10627 Midwest Industrial Blvd.
St. Louis, MO 63132
(888) 741-6425

Service Receipt 004

Job #:

Customer: EAGLE PICHER
Cust. Contact: D ROMMECK
Cust. Phone: 313 562 6400
Location: 2638 PRINCESS ST
Unit: INKSTER MI
Date: WED 10/27/04
Customer Work Order #:
Work Performed: LOAD/HAUL SOLVENT IMPACTED SOIL CUT V TANKS
Customer P.O. #/Reg. #

☐ Hydrobalst ☐ Vacuum ☐ Chemical ☐ Shop Other

EQUIPMENT

Time In	Time Out	Hours	Unit #	Description	Mileage	Description
: AM PM	: AM PM			F250		
: AM PM	: AM PM			JD230C LC		
: AM PM	: AM PM			JD 624J		
: AM PM	: AM PM					
: AM PM	: AM PM					
: AM PM	: AM PM					
: AM PM	: AM PM					

LABOR

Time In	Time Out	Hours	Class	Name	Travel	Per Diem	Deduct
5:30 AM PM	6:30 AM PM	13	PM	J OSMAND			
5:30 AM PM	6:30 AM PM	13	OP	K MORICE			
: AM PM	: AM PM						
: AM PM	: AM PM						
: AM PM	: AM PM						

CHEMICAL/SUPPLIES/MISCELLANEOUS

Description	Quantity	Unit of Measure	Description	Quantity	Unit of Measure
EQ HAULING					
EQ DISPOSAL					
			HOME DEPOT		
			PER DIEM	2	30.00
			FAIRFIED	2	Room

Job Notes:

Final Service Receipt for job? ☐ Yes ☐ No

The work is completed, the equipment is operating properly, the workspace is properly cleaned and there are no new hazards as a result of this work.

Customer's Signature _____ Prepared by: _____

1. Standard Rates are for work performed between the hours of 8AM to 5PM Monday through Friday
2. Overtime Rates will be charged from 5PM to 8PM Monday through Friday and all day Saturday
3. Sunday and Holidays will be billed at Double Time.
4. Minimum Daily Charge will be one-half day
5. EMA makes no guarantees with respect to the completeness of the washing process or the complete elimination of all residue and moisture. INSPECTION of the vessel is agreed to remain the RESPONSIBILITY OF THE customer and they do hereby relieve and discharge EMA of any responsibility, claims and demands of any kind whatsoever by any person for damages as a result of alleged improper or incomplete cleaning of the vessel. I HAVE READ AND UNDERSTAND THE ABOVE CONDITIONS.

White Copy: Invoicing Yellow Copy: Division Copy Pink Copy: Customer Copy

EMA
ENVIRONMENTAL MANAGEMENT ALTERNATIVES

10627 Midwest Industrial Blvd.
St. Louis, MO 63132
(888) 741-6425

Service Receipt
005

Job #:

Customer: EAGLE PICHER
Cust. Contact: D ROMMECK
Cust. Phone: 313 562 6400
Location: 2638 PROGRESS
Unit: TRENTON MI
Date: THU 10/28/04
Customer Work Order #:
Work Performed: BACKFILL ; ROUGH GRADE
Customer P.O. #/Reg. #

☐ Hydrobalst ☐ Vacuum ☐ Chemical ☐ Shop ☐ Other

EQUIPMENT

Time In	Time Out	Hours	Unit #	Description	Mileage	Description
: AM PM	: AM PM			F250		
: AM PM	: AM PM			SKID STEER		
: AM PM	: AM PM					
: AM PM	: AM PM					
: AM PM	: AM PM					
: AM PM	: AM PM					
: AM PM	: AM PM					

LABOR

Time In	Time Out	Hours	Class	Name	Travel	Per Diem	Deduct
6:00 AM PM	10:06 AM PM	16	PM	J Cosmo			
6:00 AM PM	10:00 AM PM	16	OP	K Morrice			
: AM PM	: AM PM						
: AM PM	: AM PM						
: AM PM	: AM PM						

CHEMICAL/SUPPLIES/MISCELLANEOUS

Description	Quantity	Unit of Measure	Description	Quantity	Unit of Measure
			PER DIEM ✓	2	30$

Job Notes:

Final Service Receipt for job? ☒ Yes ☐ No

The work is completed, the equipment is operating properly, the workspace is properly cleaned and there are no new hazards as a result of this work.

Customer's Signature

Prepared by: J Cosmo

1. Standard Rates are for work performed between the hours of 8AM to 5PM Monday through Friday
2. Overtime Rates will be charged from 5PM to 8PM Monday through Friday and all day Saturday
3. Sunday and Holidays will be billed at Double Time.
4. Minimum Daily Charge will be one-half day
5. EMA makes no guarantees with respect to the completeness of the washing process or the complete elimination of all residue and moisture. INSPECTION of the vessel is agreed to remain the RESPONSIBILITY OF THE customer and they do hereby relieve and discharge EMA of any responsibility, claims and demands of any kind whatsoever by any person for damages as a result of alleged improper or incomplete cleaning of the vessel. I HAVE READ AND UNDERSTAND THE ABOVE CONDITIONS.

White Copy: Invoicing Yellow Copy: Division Copy Pink Copy: Customer Copy

Environmental Management Alternatives

DAILY TOOL BOX SAFETY MEETING RECORD

SIGNED BY ALL IN ATTENDANCE: J Cosmano, Ken Morice

JOB NAME: 2368 PRINCESS ST	JOB NUMBER:
JOB LOCATION: 2638 PRINCESS ST	MEETING DATE: TUE 10/26/04
MEETING TIME: 0630	CONDUCTED BY: COSMANO
SITE MANAGER: COSMANO	SITE HEALTH & SAFETY: COSMANO
FOREMAN:	NO. COMPANY EMPLOYEES: 2 NO. SUBCONTRACTORS: NO. OTHERS:

DAILY SCOPE OF WORK TOPICS/ACCIDENTS

EXCAVATE & LOAD SOLVENT IMPACTED SOIL
FINISH REMOVING OH PRODUCT LINES
CUT VERTICAL TANKS FOR RECLAMATION

CHEMICAL HAZARDS

CHEMICAL	ROUTE(S)	[illegible]	SIGN & SYMPTOMS
SEE EP	MSDS	RIGHT TO KNOW	STATION

H. EQUIP	SPOTTER; EYE CONTACT
SLIPS TRIPS FALLS	HOUSE KEEPING
SAWSALL	PROPER USE; CHECK ELEC. CORD
CONFINED SPACE	MONITOR; PREVIOUSLY CLEANED; NO ENTRY

D	EXCAVATE & LOAD
D	PRODUCT LINE
D	VERTICAL TANKS

Environmental Management Alternatives

DAILY TOOL BOX SAFETY MEETING RECORD

SIGNED BY ALL IN ATTENDANCE

JOB NAME: 2638 PRINCESS ST	JOB NUMBER:
JOB LOCATION: INKSTER MI	MEETING DATE: WED 10/27/04
MEETING TIME: 0530	CONDUCTED BY: COSMANO
SITE MANAGER: COSMANO	SITE HEALTH & SAFETY: COSMANO
FOREMAN:	NO. COMPANY EMPLOYEES: NO. SUBCONTRACTORS: NO. OTHERS:

DAILY SCOPE OF WORK/TOPICS/ACCIDENTS

EXCAVATE / LOAD SOIL
CUT V-TANKS (PREVIOUSLY CLEANED)
BACKFILL
ASSIST CONSULTANT

	ROUTE(S)		SIGN & SYMPTOMS
SEE E.P. MSDS		RIGHT TO KNOW STATION	

H EQUIP	SPOTTER: EYE CONTACT
NOISE	HEARING PROTECTION
FLAMMABILITY — USTS	ATMOSPHERE MONITOR

D	EXCAVATE	
D	CUT	
D	BACKFILL	
C	ASSIST	

Environmental Management Alternatives

DAILY TOOL BOX SAFETY MEETING RECORD

SIGNED BY ALL IN ATTENDANCE: Cosmano

JOB NAME: 2638 Princess St	JOB NUMBER:
JOB LOCATION: Inkster MI	MEETING DATE: THU 10/28/04
MEETING TIME: 0600	CONDUCTED BY: Cosmano
SITE MANAGER: Cosmano	SITE HEALTH & SAFETY: Cosmano
FOREMAN:	NO. COMPANY EMPLOYEES: 2 NO. SUBCONTRACTORS: NO. OTHERS:

LOAD OUT ~~USTS~~ ASTS (3)
FINISH BACKFILL
ROUGH GRADE
HOUSEKEEPING

SEE EP MSDS RIGHT TO KNOW STATION

OVERHEAD LOAD	DO NOT GO UNDER LOAD; TAG LINE
HEAVY EQUIP	SPOTTER
SLIPS TRIPS FALLS	HOUSE KEEPING

D	LOAD
D	BACKFILL
D	GRADE
D	HOUSE KEEPING

ENVIRONMENTAL MANAGEMENT ALTERNATIVES, INC.
10627 MIDWEST INDUSTRIAL BLVD.
ST. LOUIS, MO 63132
TELEPHONE: (314) 785-6425
FAX: (314) 785-6426

CHANGE ORDER

CLIENT NAME: EAGLE PICHER
DATE: WED 10-27-04
PROJECT NAME: 2638 PRINCESS
WORK ORDER #:
LOCATION: INKSTER MI
CHANGE ORDER #: 60-001

Description of new or changed work or conditions:
REMOVE / CUT / DISPOSE (RECYCLE) 3 AST'S — $4500.00
EMA TO RETAIN SCRAP VALUE
REMOVE SOUTH RETAINING WALLS; LEAVE SLAB;

Describe any payment arrangement or other important impacts not addressed above:

Agreed by E.M.A and Customer:

E.M.A. Representative:

Signature: [signature]
Customer: [signature]

Print: JEFFREY COSMANO
Print: [signature]

EMA
ENVIRONMENTAL MANAGEMENT ALTERNATIVES

Job Number: _____ **Date:** 10/25/04

Job Name: 2638 PRINCESS ST. **Location:** INKSTER, MI

Site Description: FORMER GASKET MANUFAC FACILITY; ACTIVE CAR ACCESSORY MANUFAC FACILITY

A. JOB OBJECTIVES/TASKS:

1. CLEAN/REMOVE OH LINES
2. REMOVE CLEAN OB
3. EXCAVATE/STOCKPILE CONTAM.
4. LOAD CONTAM.
5. BACKFILL W/OB
6. _____

B. ONSITE ORGANIZATION AND COORDINATION: The following personnel are designated to carry out the stated job functions on site. (Note: one person may carry out more that one job function.)

CONTRACTING COMPANY OR AGENCY	EAGLE PITCHER
CONTACT OR GOVERNMENT OFFICAL (S)	
EMA PROJECT MANAGER	COSMANO
EMA SITE SAFETY OFFICER	COSMANO
EMAFIELD TEAM MEMBERS	K MARICE

The EMA Project Manager has overall responsibility for all activities on site, including implementation of the site health and safety plan. The Project Manager may delegate this function to the Site Safety Officer.

The EMA Site Safety Officer is responsible for ensuring that work crews comply with all site safety and health requirements.

EMA Field Team Members will be responsible for understanding and complying with all site safety and health requirements.

All activities on site must be cleared through the Project Manager.

EMA
ENVIRONMENTAL MANAGEMENT ALTERNATIVES

C. SITE HAZARD IDENTIFICATION

Hazards: (check all that apply)
Chemical(s) (specify) _____

Heavy Equipment	X	Biological Agent	
Confined Space	X	Heat	
Flammability	X	Cold	
Reactivity		Drums	
Topography		Oxygen Deficiency	
Electrical	X	Corrosivity	
Noise	X	Altitude	
Radiation		Wildlife	
Ergonomic		Drilling	
Excavation			
Other			

D. HAZARDOUS ANALYSIS

HAZARD	SOURCE	PREVENTION
H. EQUIP	TRACTOR / LOADER	SPOTTER; EYE CONTACT
C. SPACE	TANK FARM	EMA C.S. POLICY / PERMIT ENTRY
FLAMM	PLANT CHEMICALS	ATMOS MONITOR
ELECTRICITY	TANK FARM ENERG	LOCKOUT TAGOUT; TIC TRACER
NOISE	H. EQUIP	HEARING PROTECTION

E. CHEMICAL HAZARDS

NAME	CONCENTRATION	TLV/PEL	ROUTES OF EXPOSURE	SIGNS OF EXPOSURE	FIRST AID
SEE EP MSDS – RIGHT TO KNOW STATION					

EMA
ENVIRONMENTAL MANAGEMENT ALTERNATIVES

F. ONSITE CONTROL

Control boundaries have been established, and the Exclusion Zone (EZ), Contamination Reduction Zone (CRZ), and Support Zone (SZ) have been identified and designated. These boundaries are identified as follows (marking of zones, i.e., red boundary tape - hotline; traffic cones - Support Zone; etc.) All personnel on-site must sign in/out with designated ER representative/s.

EZ location: TANK FARM & LAND FARM AREA

CRZ location: MAINT OFFICE AREA

SZ location: GUARD SHACK (OFF PRINCESS)

G. PERSONAL PROTECTIVE EQUIPMENT

Based on evaluation of potential hazards, the following levels of personal protection have been designated for the applicable work areas or tasks:

Location	Job Task/s	Levels of Protection (Circle One)
Exclusion Zone	CUT LINES/TANKS	A B C (D) Other
	EXCAVATE/LOAD	A B C (D) Other
	BACKFILL	A B (C) D Other
		A B C D Other
Contamination Reduction Zone	PPE	A B C D Other
Support Zone	Support EZ and CRZ Tasks	Level D/Modified Level D

Specific protective equipment for each level of protection is as follows:

Level A
- Level A Suit
- SCBA
- Tyvek inner suit
- Inner Gloves
- Boot Covers
- Outer Gloves

Level B
- Chemical Resistant Outer Suit
- SCBA
- Tyvek inner suit
- Inner Gloves
- Boot Covers
- Outer Gloves
- Hard Hat

Level C
- Fullface Respirator
- Tyvek/Saranex
- Inner/Outer Gloves
- Steel Toed Boots
- Boot Covers
- Hard Hat
- Ear Protection (as Required)

Level D
- Steeled Toed Boots
- Hard Hat
- Safety Glasses
- Ear Protection (as Required)

Mod. Level D add
- Tyvek/Saranex
- Outer Gloves

Other

NO CHANGES TO THE SPECIFIED LEVELS OF PROTECTION SHALL BE MADE WITHOUT THE APPROVAL OF THE SITE SAFETY OFFICER AND THE PROJECT MANAGER

ENVIRONMENTAL MANAGEMENT ALTERNATIVES

H. ENVIRONMENTAL MONITORING

The following environmental monitoring instruments shall be used on site (cross out if not applicable) at the specified intervals.

Combustible Gas Indicator - continuous/hourly/daily/ N/A

O_2 Monitor - continuous/hourly/daily/ N/A

HNU/OVA - continuous/hourly/daily/ N/A

Colorimetric Tubes - continuous/hourly/daily/ N/A (type)_____

Other _____ - continuous/hourly/daily/other

All survey instruments are field-calibrated. A record is kept, onsite, of the calibration.

I. PERSONAL MONITORING

The following personal monitoring will be in effect on site:
Personal exposure sampling:(describe any personal sampling programs being carried out on site personnel. This would include use of sampling pumps, air monitors, etc.): NA

Medical monitoring: The expected air temperature will be (70F). If it is determined that heat stress monitoring is required (mandatory if over 70°F) the following procedures shall be followed: (describe procedures in effect, i.e., monitoring body temperature, body weight, pulse rate):_____

J. COMMUNICATION PROCEDURES

Channel NA has been designated as the radio frequency for personnel in the Exclusion Zone. Personnel in the Exclusion zone should remain in constant communication (radio or visual) with the Project Team Leader and/or support personnel.

Hand Signals (Horn blast, siren, etc.) is the emergency signal to indicate that all personnel should leave the Exclusion Zone.

The following standard hand signals will be used in case of failure of radio communications:

Hand gripping throat ----------Out of air, can't breathe
Grip partner's wrist or both hands around waist ----------Leave area immediately
Hands on top of head----------Need Assistance
Thumbs up----------OK, I am all right, I understand
Thumbs down----------No, negative

Telephone communication to the Command Post/Project Manager via cellular phone should be established as soon as practicable. Site Cell phone number is 314221 6703

ENVIRONMENTAL MANAGEMENT ALTERNATIVES

K. DECONTAMINATION PROCEDURES

Personnel and equipment leaving the Exclusion Zone shall be thoroughly decontaminated. The standard level B / C decontamination protocol shall be used with the following decontamination stations:

1) CLEAN BOOTS
2)
3)
4)
5)
6)
7)
8)
9)
10)
Other

The decontamination station will be located immediately adjacent to the exclusion zone in the contamination reduction zone.

Emergency decontamination will include the following stations:

1) AS NECESSARY (REMOVE BOOTS)
2)
3)
4)
5)
6)

Equipment decontamination will be as follows:

1) AS NEEDED (BUCKET/TRACKS)
2)
3)
4)
5)
6)

The following decontamination equipment is required:

1) BUCKET / TRACKS / WHEELS
2)
3)
4)
5)
6)

L. EMERGENCY MEDICAL CARE

Closest Hospital: _____
Address: _____
Phone: _____
Route to Hospital: _____

Ambulance:	_____	Phone:	911 or _____
Police:	_____	Phone:	911 or _____
Fire:	_____	Phone:	911 or _____

First-aid equipment is available on site at the following locations:

Physician approved First-aid Kit TRUCK
Emergency eyewash PLANT
Emergency shower PLANT
Other _____

ENVIRONMENTAL MANAGEMENT ALTERNATIVES

M. EMERGENCY PROCEDURES

Onsite personnel will use the following standard emergency procedures. The Site Safety Officer shall be notified of any onsite emergencies and be responsible for ensuring that the appropriate procedures are followed.

Personnel Injury in the Exclusion Zone: Upon notification of an injury in the Exclusion Zone, the designated emergency signal of 3 horn blasts shall be sounded. All site personnel shall assemble at the decontamination line. The rescue team will enter the Exclusion Zone (if required) to remove the injured person to the hotline. The Site Safety Officer and Project Team Leader should evaluate the nature of the injury, and the affected person should be decontaminated to the extent possible prior to movement to the Support Zone. The onsite EMT shall initiate the appropriate first aid, and contact should be made for an ambulance and with the designated medical facility (if required). No persons shall re-enter the Exclusion Zone until the cause of the injury or symptoms is determined.

Personnel Injury in the Support Zone: Upon notification of an injury in the Support Zone, the Project Team Leader and Site Safety Officer will asses the nature of the injury. If the cause of the injury of loss of the injured person does not affect the performance of site personnel, operations may continue, with the onsite EMT initiating the appropriate first aid necessary follow-up as stated above. If the injury increases the risk to others, the designated emergency signal of 3 horn blasts shall be sounded and all site personnel shall move to the decontamination line for further instructions. Activities on site will stop until the added risk is removed or minimized.

Fire/Explosion: Upon notification of a fire or explosion on site, the designated emergency signal of 3 horn blasts shall be sounded and all site personnel assembled at the decontamination line. The fire department shall be alerted and all personnel moved to a safe distance from the involved area.

Personal Protective Equipment Failure: If any site worker experiences a failure or alteration of protective equipment that affects the protection factor, that person and his/her buddy shall immediately leave the Exclusion Zone. Re-entry shall not be permitted until the equipment has been repaired or replaced.

Other Equipment Failure: If any other equipment on site fails to operate properly, the Project Team Leader and Site Safety Officer shall be notified and then determine the effect of this failure on continuing operations on site. If the failure affects the safety of personnel or prevents completion of the Work Plan tasks, all personnel shall leave the Exclusion Zone until the situation is evaluated and appropriate actions taken.

The following emergency escape routes are designated for use in those situations where egress from the Exclusion zone cannot occur through the decontamination line: (describe alternate routes to leave area in emergencies): EAST TO GUARD SHACK ON JOHN DALY AVE

In all situations, when an onsite emergency results in evacuation of the Exclusion Zone, personnel shall not re-enter until:

1. The conditions resulting in the emergency have been corrected.
2. The hazards have been reassessed.
3. The Site Safety Plan has been reviewed.
4. Site personnel have been briefed on any changes in Site Safety Plan.

ENVIRONMENTAL MANAGEMENT ALTERNATIVES

N. EMPLOYEE TRAINING

All field employees receive forty hours of classroom training on safe work practices and hazardous waste sites. Topics include:

Regulatory Compliance (OSHA, EPA, DOT)
Toxicology
Flammables
Corrosives Reactions
Respiratory Protection
Protective Clothing
Environmental Monitoring
Site Safety Plans
Contingency Plans
Noise Stress
Heat/Cold Stress
Ionizing Radiation
Drum Handling
Confined Space
Decontamination
Medical Surveillance
Hazard Communication

Annually thereafter, all field employees receive eight hours of refresher training on the above topics. Manager and Supervisors receive eight hours of training on safe management of hazardous waste sites.
All training complies with 29 CFR 1910.120.
All field employees receive initial and recertification training in first aid and CPR.
Site-specific training is held at the beginning of the job. Daily site safety meetings are held at the site and a record is kept.

O. MEDICAL SURVEILLANCE

Pre-employment and periodic update medical examinations are required by 29CFR 1910.120 for persons working at hazardous waste sites. The medical examination must have been within a 12-month period prior to on-site activity and repeated annually. A licensed physician issues a written opinion that the worker is fit-for-duty for hazardous waste site work and respirator wear. Workers are informed of their right to accessibility of medical records. The EMA written Medical Surveillance Program is on file in the EMA – St. Louis, MO office.

P. HAZARD COMMUNICATION

In accordance with 29 CFR 1910.1200, all site workers working with hazardous materials are provided with adequate information about their dangers and precautions. Containers of hazardous materials are labeled. MSDS' are kept on site. Workers receive training on the information on the MSDS' as part of the daily safety meetings. The EMA written Hazard Communication Program is on file in the EMA – St. Louis, MO office.

ENVIRONMENTAL MANAGEMENT ALTERNATIVES

Q. HASP REVIEW

All site personnel have read the above plan and are familiar with its provisions.

	PRINT NAME	SIGNATURE	DATE
Site Safety Officer	J COSMANO	[illegible]	10/25/04
Project Manager	J COSMANO	[illegible]	10/25/04
Site Personnel	Ken MORICE	[illegible]	10-25-04
Visitors			

HYDROGEOLOGICAL INVESTIGATION REPORT
at
WOLVERINE GASKET COMPANY
INKSTER, MICHIGAN

submitted to

WOLVERINE GASKET COMPANY

prepared by

WW Engineering & Science

January 11, 1990

Project No. 21365

WW Engineering & Science
Williams & Works, WW Facilities Group, EDI Engineering & Science
Grand Rapids, and Allen Park, MI; Omaha, NE

MI0012904

1.0 INTRODUCTION

WW Engineering & Science (WWES), formerly EDI Engineering & Science, was contracted by Wolverine Gasket Company (WOLVERINE) on September 21, 1989, to perform an off-site hydrogeological investigation at the Princess Street facility in Inkster, Michigan. Based on the results of the investigation, a second work element was to evaluate available recovery and treatment methods to remediate the impacted area. WWES conducted the hydrogeologic investigation at the WOLVERINE facility on November 8 and 9, 1989. The investigation was conducted following the Scope of Work presented in Section 2 of the WWES proposal dated July 24, 1989. This report presents findings and recommendations of the hydrogeological investigation. The recommended remedial treatment system will be presented in a separate report.

1.1 SITE HISTORY

Wolverine Gasket Company occupies approximately two acres of a four-acre site jointly owned by Wolverine Gasket and their parent company, Eagle Pitcher. The site is located within the SE1/4 of the NW1/4 of Section 30 T2SR10E, Inkster, Michigan 7.5-minute quadrangle map, Wayne County, Michigan. A partial site map showing the study area is presented in Figure 1.

Wolverine began initial operation in approximately 1941 as a manufacturer of gasket material for the auto-supply industry. During the development of the Inkster facility, Wolverine installed an underground storage tank in 1947 to support plant processes. The contents of the tank have been reported to be either Toluene or Chlorobenzene.

The tank was in service until 1960, when a loss of inventory was reported. The tank was removed from service, pumped dry and removed from the ground. The quantity of soil removed during the tank-removal operations has not been determined.

Aboveground storage tanks were installed by Wolverine in 1953 for storage of raw toluene, in 1966 for storage of Lactol and Methyl Ethyl Ketone (MEK), and

in 1973 for storage of Isobutyl Acetate (IBA). In addition, a storage building was installed on-site to hold drums of raw solvents and waste products.

On October 10, 1983, an inventory loss of Lactol (CAS No. 64742-89-8) was reported by WOLVERINE personnel. The City of Inkster Fire Marshal and the MDNR were contacted to establish a course of action during exposure and repair of the leaking pipeline. The MDNR directed Wolverine to remove the free product from the excavation prior to closure. Wolverine complied with the MDNR and recovered a large percentage of the Lactol released to the environment.

Following recovery operations, Wolverine replaced all below-ground lines with above-ground lines. Currently, there are no underground tank or pipe systems at the Wolverine facility.

In the winter of 1988, Wolverine retained the services of OH Materials (OHM) to investigate the extent of contaminated soil on-site. OHM conducted a two-phased study to determine the extent of impacted soil and perched water. Phase 1 involved the installation of nine soil borings on-site to determine the depth to the confining clay layer, establish baseline hydrogeological parameters for the site, and determine the horizontal and vertical extent of impacted soils.

Phase 2 involved the installation of five monitoring wells on-site. The wells were positioned to provide an evaluation of the hydrogeological conditions of the site and determine the impact the released material had on the perched water.

The OHM reports conclude that off-site contamination had occurred and that further study was required prior to development of a remedial system. WWES was contracted during the transition from on-site to off-site investigation activities.

1.2 SITE HYDROGEOLOGY

As determined by the OHM reports, the surficial sandy soils on-site contact a clay till that is approximately twenty-eight feet thick. The surficial soils thicken from four feet near the plant to approximately six feet at the southern property line. A

FORM 40

WOLVERINE GASKET COMPANY

Inter-Office Correspondence

Date: 12-1-89

To: D.Matthews

cc: T.Ray, D.Weber (w/o enclosures)

Subject: Liberty Mutual's Information Request

Enclosed please find the response to Liberty Mutual's Preliminary Information Request concerning the soil and ground water contamination at Wolverine Gasket - Inkster.

Cindy Wentzel

Response to Liberty Mutual's Preliminary Information Request

1) Person responsible for environmental matters
   Wolverine, Inkster: Cindy Wentzel
   Eagle-Picher: Paul Harper

2) If waste discharged ...
   Waste was not discharged.

3) Leaking UST (area of lower contaminant concentration)
   a) Date installed: -1947
   b) Tank manufacturer: ??
   c) When inventory shortages noticed: -1960
   d) Substance stored: Toluene or monochlorobenzene
   e) Tank capacity: estimated at 2000 gallons
   f) Tank condition when removed: Poor, rusted through in spots
   g) Person who was responsible for tanks is no longer with the company and no maintenance or inspection records were found.
   h) Any contracts regarding the tank: No

   UST connected to pipe that ruptured:
   a) Date installed: 1966
   c) Inventory shortage noticed: October 10, 1983
   d) Substance stored: Lactol Spirits
      (C.A.S.# 64742-89-8, 15% Toluene)
   e) Tank volume: 1500 gallons

4) Regulatory agencies involved:
   At the time of the pipe rupture in 1983, the Department of Natural Resources and Inkster Fire Department were notified. The free product was collected as instructed by the DNR. Anthony Pitts of Northville DNR office was notified by letter of the current situation April 28, 1989. The DNR did not respond. Another letter notifying Mr. Pitts of the off-site investigation was sent November 2, 1989. Mr. Pitts phoned on November 7, 1989 to acknowledge receipt of the letter.

5) Dates and results of testing: The first investigation was run by O.H. Materials from December 8, 9 and 12, 1988 and a second phase on Wolverine property was conducted February 27 - March 2, 1989. The results of O.H.'s testing is included. EDI Engineering and Science performed an investigation of the bordering Conrail property on November 8 and 9, 1989. Results have not yet been received.

6) No clean-up or remediation has taken place.

7) Copies of invoices received to date are enclosed.

8) Other entities involved: Copies of agreements with EDI and Conrail are enclosed.

9) Engineering Reports: N/A

10) We have been unable to locate any reports, other than a short description written by the maintenance supervisor, concerning the 1983 line rupture.

October 26, 1989

Mr. Bruce M. Kovach
Liberty Mutual Insurance Company
Robinson Plaza Two, Rte 60
Robinson Township,
Pittsburgh, PA 15205

Re: Wolverine Gasket & Manufacturing Company Division of Eagle-Picher Industries, Inc. -- Toluene Contamination Problem

Dear Bruce:

Enclosed please find a copy of the letter (and its enclosure) of April 28, 1989 from Dennis K. Weber, then Executive Vice President of the Wolverine Gasket & Manufacturing Company division of this Company (and now its President), to the Michigan Department of Natural Resources.

This letter reported the discovery of toluene contamination at the Inkster plant and office location, apparently from two separate incidents: one, resulting in the lower present contaminant levels, about thirty years ago; and the other, resulting in the present higher contaminant levels, about October 10, 1983. The present toluene contamination was discovered about a year ago (October 1988).

Please accept this letter as notification of a claim by Eagle-Picher for reimbursement under the property damage provision of its policies written by Liberty Mutual Insurance Company for the costs of cleaning up the toluene at and around the plant and office site of Eagle-Picher's Wolverine Gasket & Manufacturing Company, 2638 Princess Street, Inkster, Michigan, and please acknowledge in writing Liberty Mutual's receipt of this letter.

Eagle-Picher will be happy to cooperate in any investigation Liberty Mutual may desire to make, and upon request will furnish copies of any and all engineering and/or laboratory studies that it has.

Thank you for your attention to this matter.

Yours very truly,

David W. Matthews

DWM/[illegible]/ms
Enc.

cc: w/o enc.: Mr. Dennis Weber
w/o enc.: Ms. Beatrice Davisson
w/o enc.: Ms. Cindy Kentzel
w/enc.: Mr. Vincent M. Phoney
w/o enc.: Mr. Paul D. Harper
w/o enc.: Mark S. Boyle, Esq.
w/enc.: James A. Ralston, Esq.

WOLVERINE GASKET - INKSTER

October 19, 1989

Vince Rooney, Rhoney Dave Matthews
Eagle-Picher Ind., Inc

While excavating on our property last October, toluene contamination was discovered. O. H. Materials was hired to take soil borings and install monitoring wells. The analytical results indicate two separate spills (Paul Harper has a copy of the testing results).

The area of greatest contamination is where an underground lactol spirits (contains 15% toluene) pipe ruptured six years ago. The release was discovered October 10, 1983 after the 1500 gallon above ground storage tank was suddenly found empty. The fire department and Department of Natural Resources were notified. Under DNR instruction, two hole were dug, as much solvent as possible was recovered and the holes backfilled. This was deemed adequate remediation. The contamination has since spread beyond our property line.

The area of much lower concentration is where an underground toluene storage tank was. The tank was removed approximatly 30 years ago.

Considering the ruptured pipe was a sudden and accidental release, will our liability insurance cover the cost to investigate and remediate the property damage? I spoke briefly with Dave Matthews about this. The only documentation we have been able to find on the pipe rupture is notes kept by our maintenance foreman. We are still searching old files. What is our next step in determining if it will be covered?

Sincerely,

Cindy Wentzel

Cindy Wentzel

cc: Terry Ray
Bea Davisson

Introduction

ARCADIS Geraghty & Miller was retained by the Wolverine Gasket Division of Eagle-Picher Automotive to conduct a limited soil and groundwater investigation at the manufacturing facility located at 2638 Princess Street in Inkster, Michigan (see Figure 1 for general site location). The purpose of this investigation was to (1) conduct a review of the Wolverine Gasket environmental records documenting previous investigative and remediation efforts at the site, and (2) conduct soil and groundwater sampling to provide data necessary to support a future limited industrial closure for the site. The closure of the Wolverine Gasket site will be conducted to comply with Part 201 of the Natural Resources and Environmental Protection Act (NREPA), Public Act 451, as amended.

The information provided in this report is based on field data collected by ARCADIS Geraghty & Miller on May 10 and 11, 1999 and a review of environmental documents consisting of historical reports that were provided by Wolverine Gasket.

Background

The following site information was obtained through conversations with Wolverine Gasket environmental staff and a review of available investigation and remediation reports.

- A 2,000-gallon underground storage tank (UST) located inside the Wolverine Gasket building (see Figure 2) was removed during the early 1960s. The UST had been used to store toluene (and possibly chlorobenzene). A loss of inventory was discovered during routine product measurements, and discolored soils containing toluene were discovered outside the UST during its removal. However, no records concerning the removal of toluene-impacted soils or the extent of impact are available. After the UST was removed, the excavation was backfilled with clean soil, and the concrete floor was restored.

- Aboveground storage tanks (ASTs) were installed by Wolverine Gasket in 1953 for the storage of toluene, in 1966 for the storage of Lactol and methyl ethyl ketone (MEK), and in 1973 for the storage of isobutyl acetate. The ASTs were contained in two concrete secondary containment structures, as shown on Figure 2. Lactol is composed primarily of toluene and xylenes. In addition, a storage building was installed to store drums of product solvents and waste products (see Figure 2).

- On October 10, 1983, an inventory loss of Lactol was discovered by Wolverine Gasket personnel during routine product measurements. The City of Inkster Fire Marshal and the Michigan Department of Natural Resources (MDNR, now the Michigan Department of Environmental Quality [MDEQ]) were contacted to establish a course of action during exposure and repair of the leaking pipeline. The pipeline was routed north from the Lactol tank into the Wolverine Gasket building. The MDNR directed Wolverine to remove the free product from the excavation prior to closure. Wolverine Gasket complied with the MDNR and removed Lactol released to the environment, although the quantity is unknown.

- Following Lactol recovery operations, Wolverine Gasket replaced all below-ground lines with aboveground lines. Currently, no underground piping systems exist at Wolverine Gasket.

- During December 1988, Wolverine Gasket retained the services of OH Materials (OHM) to conduct an investigation to determine the extent of impacted soil and perched groundwater resulting from the 1983 Lactol release and possibly the 1960 toluene release from the former UST. The investigation included the installation of four monitoring wells, MW-1 through MW-4, in the perched groundwater-bearing zone (see Figure 2), to a depth approximately 10 feet below grade. In addition, a fifth monitoring well, MW-5, was drilled north of Wolverine Gasket to investigate a deeper groundwater-bearing zone at a depth approximately 35 feet below grade (Figure 2). Soil and groundwater samples were collected and analyzed for benzene, toluene, ethylbenzene, and xylenes (BTEX).

- Elevated concentrations of toluene (2,790,000 micrograms per kilogram (ug/kg)) were identified in soil samples in the area of Monitoring Wells MW-1 and MW-2, along the western side of the Lactol secondary containment structure. A perched groundwater sample collected from a temporary well in the vicinity of Monitoring Well MW-1 exhibited a toluene concentration of 6,440,000 micrograms per liter (ug/L). Groundwater results from the five permanent monitoring wells sampled during the OHM investigation (MW-1 through MW-5) were not available. These wells were sampled during later investigations including the May 1999 ARCADIS Geraghty & Miller investigation.

- During November 1989, Wolverine Gasket retained WW Engineering & Science to conduct an investigation of the Conrail property located immediately south of the Wolverine Gasket property. The purpose of the investigation was to determine if shallow soils and perched groundwater on the railroad property were impacted

by toluene and xylenes migrating from the Wolverine Gasket property. Five soil borings, SB-1 through SB-5, were installed; three of the soil borings were converted to Monitoring Wells MWO-01 through MWO-03. Elevated concentrations (12,000 ug/kg) of toluene and xylenes were identified in Soil Borings SB-1 through SB-3, but none of these soil concentrations exceed any of the current MDEQ generic industrial cleanup criteria. Perched groundwater samples were collected from temporary wells, SB-1 through SB-4, and the three permanent monitoring wells, MWO-01 through MWO-03. Only one perched groundwater sample, collected from the railroad property, contained an elevated concentration, 110,000 ug/L, of toluene (SB-3). This concentration is above the Part 201 flammability and explosivity screening level of 31,000 ug/kg. However, toluene has not been detected in any of perched groundwater samples that were collected from MWO-01 through MWO-03 for the quarterly monitoring that was started during May 1992. Monitoring Wells MW-6 and MW-7 were constructed by WW Engineering & Science before November 1990, but no records in the Wolverine Gasket files specify the exact date(s) of construction.

- A bioremediation system designed by WW Engineering & Science was installed on the Wolverine Gasket property during 1992 (Figure 2). Although the system is not currently operating, it was designed to collect impacted perched groundwater from the shallow perched groundwater-bearing zone.. The impacted perched groundwater was pumped to a collection building located north of Monitoring Well MW-2, where hydrogen peroxide and nutrients were added. The perched groundwater was then pumped underground to a "reinjection trench" located between the southern wall of the building and a soil pile created from the excavation of the treatment system trenches. The soil pile is located between the Wolverine Gasket building and an area occupied by the ASTs and drum storage building (see Figure 2). The bioremediation system was designed to "cycle" the impacted perched groundwater from the injection trench back to the collection trench and sump, allowing the treatment process to be repeated continuously.

- Perched groundwater monitoring of all monitoring wells (except MW-4 and MW-5) for toluene and xylenes has occurred on a quarterly basis since May 1992.

Site Activities

To evaluate current soil and groundwater conditions at the site, ARCADIS Geraghty & Miller conducted a soil and groundwater investigation at the Wolverine Gasket site on May 10 and 11, 1999. The investigation consisted of the following activities:

TABLES

ARCADIS
GERAGHTY & MILLER

Soil and Groundwater Sampling Investigation Report

Wolverine Gasket Division
2638 Princess Street
Inkster, Michigan

PREPARED FOR

Eagle-Picher Automotive
Wolverine Gasket Division

The Inkster Facility has had a remediation project operational since 1992. The project was implemented to remediate soil and perch water contamination from two historic releases on site.

Background

A 2,000 gallon underground storage tank(UST) located inside the Wolverine Gasket Manufacturing facility was removed during the early 1960's The UST had been used to store an undetermined solvent product utilized in the mixing process. A loss of inventory was discovered during routine product measurements, the UST was removed. Records and documentation of this event are limited.

In 1983 Wolverine Gasket filed a release from an Aboveground Storage Tank (AST) system utilized to store raw materials on site. The release was from the underground material supply system associated with the AST's. The material released is believed to be either Toluene or Lactol. The quantity and extent of the release were not immediately quantified or completely remediated.

Additions to the manufacturing facility in 1988 identified a severe contamination problem. Subsurface investigation of the groundwater and soil were conducted. Consequently, Wolverine Gasket entered into an agreement with the State of Michigan to implement a Bioremediation project to address the contamination. The agreement was a voluntary action and one of the first approved bioremediation projects in the state. The system had been estimated to clean the contamination to closure levels within a three to five year window.

Current Status

Wolverine Gasket has followed the agreed operation of the system and accompanying reporting requirements. The project has been hindered by numerous personnel changes with both Wolverine Gasket and the State of Michigan. This negatively impacted the progress and record keeping of the project. The facility has had limited communications with the State since 1994. In 1999, the facility internally conducted an investigation in preparation for future agency interaction. The system has not run since the Fall of 2001 due to concerns on the effectiveness of the system and liabilities associated with surface runoff from pumping operations that had the potential to discharge to the storm water system. In July 2001, the State of Michigan Environmental Response Division contacted Wolverine Gasket. Mr. Jim Ferrito was assigned as project manager of the site. The State of Michigan has decided to take an active role in the project by monitoring the progress and further subsurface investigation.

Actions
Wolverine Gasket has implemented steps to continue a proactive approach to remediation of subsurface contaminates on the property.

Phase I – Retain an engineering firm to compile a status report of project and system effectiveness. The report will identify deficiencies in the system and recommend improvements. Budget proposal: $5,000 - $8,000

Phase II - Evaluate recommendations from report and implement corrections. The system trenching and pumping operation will have to immediately be corrected to satisfy State of MI requirements. Budget proposal: $5,000 - $10,000

Potential Actions – An area within the remediation project has the potential to become an immediate concern. It is believed that contaminated soil from the installation of the project was stockpiled on the property as a part of the project. The area has not been identified by the State of MI; it will be a great concern as a current source of contamination and a potential regulatory liability when the state is notified. Removal of the soil may be mandated. Budget proposal: $70,000.

Potential Actions – It is anticipated that the State of MI may request a subsurface investigation of contamination under the facility. Without a scope of work it is difficult to estimate the costs associated with the investigation.

WW Engineering & Science, Inc.
39209 West Six Mile Road, Suite 110 • Livonia, MI 48152 • (313) 591-0522, Fax (313) 591-0549

December 17, 1991

Ms. Cheryl James
Wolverine Gasket Division
Eagle-Picher Automotive Group
2638 Princess Street
Inkster, Michigan 48141

Dear Ms. James:

As requested, this letter summarizes the regulatory compliance strategy used to develop the remedial action for your facility. The Michigan Environmental Response Act, Act 307 is the regulation that was developed by the state to formulate remedial actions and cleanup criteria for known environmental contamination at a site. Act 307 requires the Michigan Department of Natural Resources (MDNR) to create a list of sites and prioritize those sites for remedial action. To date, your facility has not been included on this list or the 1992 proposed list.

Although the MDNR has not placed your facility on the Act 307 list, the Act 307 program has been followed for it best suits your goal to remediate the release at your facility. The program includes: 1) site investigation for determination of the extent of contamination and risks to the public and the environment; 2) determination of the most practical and feasible remedial action for the site; and 3) development of a remedial action plan that describes in detail the remedy for the site, the cleanup levels, and if applicable, a operation and maintenance plan and a monitoring program. All of this documentation has been completed, except for full characterization of the site. As we discussed, the MDNR may request additional field work to define the vertical and horizontal extent of contamination.

The remedial system developed for your facility includes the injection of the collected groundwater back into the soils. In order to operate this system, the MDNR must provide approval for either an exemption of a groundwater discharge permit or a groundwater discharge permit. The application for exemption of a groundwater discharge permit has been submitted to the MDNR.

Public Act 64, the Michigan Hazardous Waste Management Act, is the state regulation governing hazardous waste activities. The act includes the requirement to obtain a permit for the treatment of hazardous waste, and the *in situ* bioremediation system falls under the definition for hazardous waste treatment. The Environmental Response Division at the MDNR, however, does not require a hazardous waste treatment permit under Act 64. as long as the site remediation work is approved under Act 307. The MDNR reviews the Act 307 work plans to assure that a level of protection similar to Act 64 is achieved. Once the MDNR approves your remedial action plan and the exemption for a groundwater discharge permit, the remediation system can be installed and operated.

Also, you requested some information on the ability to replace the excavated contaminated soils back into the trenches as shown in the design. Approval from the MDNR will be required in order to replace those soils removed during trenching. I contacted Mr. Ed Novak of the MDNR and asked for approval. He wanted to become more familiar with the site before providing a response. I gave Mr. Novak a copy of design package for review.

WWES has been involved with similar projects where replacement of the soils has been allowed. I have also enclosed a copy of a memo from the Chief of the ERD to ERD Staff, which provides the ERD staff with the guidance for allowing replacement of contaminated soils. If the returned soils are treated with a remedial action that complies with Act 307 rules, then the replacement of the soils is allowable.

I hope this letter covers your concerns about regulatory requirements for the remediation system. If you have any questions, please call me at 313/591-0522.

Sincerely,

WW ENGINEERING & SCIENCE, INC.

Jayne Joy

Jayne Joy
Environmental Engineer

Attachment

48320/jj-b:envcom/12-91/JJ/jp/Wolverine Gasket

November 27, 1991

To: Cheryl James
Wolverine Gasket
2638 Princess Street
Inkster, MI 48141

From: Edward A. Novak
Project Manager
Environmental Response Division
MDNR
38980 Seven Mile Road
Livonia, MI 48152

Re:Wolverine Gasket Remedial Action Plan

Dear Cheryl:

Our files appear to be deficient. Basically we have no information between November 2, 1989 and the RAP submitted May 20, 1991. In particular we would like the folling information:

1.) Jan. 1990 report summarizing most recent findings.

2.) Any other information that characterizes the horizontal and vertical extent of the contamination, including how far the contamination has spread off the property.

3.) Any correspondence from this office to Wolverine between the above dates.

4.) Correspondence between Wolverine and Waste Management Division of the MDNR.

If you have any questions please call me at 953-0245.

Sincerely,

Edward A. Novak

Edward A. Novak
Project Manager

MEMORANDUM

TO: H&H METALS CO

FROM: JEFFREY COSMANO

SUBJECT: CERTIFICATE OF DISPOSAL

DATE: 11/1/2004

CC: DOUG ROMMECK, WOLVERINE – GASKET

PLEASE REVIEW THE ENCLOSED DOCUMENT REGARDING CLEANING AND DISPOSAL OF CERTAIN AST'S FORMERLY LOCATED AT WOLVERINE GASKET, 2638 PRINESS STREET IN INKSTER, MICHIGAN.

PLEASE SIGN THE AREAS INDICATED (YELLOW HIGHLIGHT) AND FORWARD THE ORIGINAL DOCUMENT TO THE PERSON LISTED BELOW. YOU MAY PHOTOCOPY THE DOCUMENT FOR YOUR RECORDS, IF YOU SO DESIRE.

WOLVERINE GASKET
MR. DOUGLASS ROMMECK
2638 PRINCESS STREET
INKSTER, MICHIGAN 48141

IF YOU HAVE QUESTIONS OR COMMENTS, YOU MAY REACH ME AT 314.221.6783.

THANK YOU.

NOV - 3

COPY

Certificate of Reclamation / Disposal

Project Number: 04 093 ST/UT Number: NA

Owner / Generator: WOLVERINE GASKET
Address: 2638 PRINCESS STREET
City/State/Zip Code: INKSTER MICHIGAN
Contact5: DOUG ROMMECK
Phone: 313 562 6400

Site Location: Building: WOLVERINE GASKET
Address: 2638 PRINCESS STREET
City/State/Zip Code: INSTER MICHIGAN
Contact: DOUG ROMMECK
Phone: 313 562 6400

Contractor: Environmental Management Alternatives
Address: 10627 Midwest Industrial Boulevard
City/State/Zip Code: Saint Louis, Missouri 63132
Contact: Jeffrey Cosmano
Phone: (314) 785-6425

Removal Date: 10/27/04
Cleaning Date: 12/21/03
Disposal Date: 10/28/04

UST's Removed:

	Tank 1	Tank 2	Tank 3	Tank 4*
Previous Contents:	MEK	LACTOL	DIBK	TOLUENE
Nominal Capacity:	8085	1600	5075	10,040
Dimension (l, d):	21.5 X 8	9 x 5.5	13.5 X 8	15.5 X 10.5
Tank Material:	STEEL	STEEL	STEEL	STEEL
Observed integrity:	FAIR	FAIR	FAIR	FAIR

UST Cleaning procedure:

Pressure Wash:	X	X	X	X
Triple Rinse:				
Manual Scrape & Shovel:	X	X	X	X
Absorbent (Oil Dry):	X	X	X	X
Solvent Rinse:				
Abrasive Blast:				

* SEE NOTE ON PAGE 2

MI0012922

COP

Removal / Cleaning Contractor Certification

The aforementioned UST's were removed, cleaned and rendered unfit for future use. The former UST's are being delivered to the designated reclamation / disposal facility listed below.

* AST #4 (TOLUENE) CLEANED IN DEC '03; LEFT IN PLACE

By: Jeffrey Cosmano

Title: Project Manager

Date: 12/21/03

Disposal Facility

Scarp Metal Facility X, Landfill _____, Other _____;

Name: H&H METALS CO
Address: 29131 MICHIGAN AVE
City/State/Zip Code: INKSTER, MI 48141
Contact: RICK WADE
Phone: 313.728.8050

* ONLY AST'S 1, 2, & 3

On the day of , 2004, the aforementioned UST(s) were received in a condition unfit for future use and are being recycled as scrap metal or disposal in a landfill (circle one) in accordance with federal, state and local regulatory requirements.

By: _____

Title: _____

Date: _____

Removal / Cleaning Contractor Certification

The aforementioned UST's were removed, cleaned and rendered unfit for future use. The former UST's are being delivered to the designated reclamation / disposal facility listed below.

* AST #4 (TOLUENE) CLEANED IN DEC '03; LEFT IN PLACE

By: Jeffrey Cosmano

Title: Project Manager

Date: 12/21/03

Disposal Facility

Scarp Metal Facility X, Landfill _____, Other _____;

Name: H & H METALS CO
Address: 29131 MICHIGAN AVE
City/State/Zip Code: INKSTER, MI 48141
Contact: RICK WADE
Phone: 313.728.8050

* ONLY AST'S 1, 2, & 3

On the 03 day of NOV., 2004, the aforementioned UST(s) were received in a condition unfit for future use and are being recycled as scrap metal or disposal in a landfill (circle one) in accordance with federal, state and local regulatory requirements.

By: [signature]

Title: PMOS

Date: 11/3/04

Certificate of Reclamation / Disposal

Project Number: 04 093 ST/UT Number: NA

Owner / Generator: WOLVERINE GASKET
Address: 2638 PRINCESS STREET
City/State/Zip Code: JANESTER MICHIGAN
Contact5: DOUG ROMMECK
Phone: 313 562 6400

Site Location: Building: WOLVERINE GASKET
Address: 2638 PRINCESS STREET
City/State/Zip Code: JANESTER MICHIGAN
Contact: DOUG ROMMECK
Phone: 313 562 6400

Contractor: Environmental Management Alternatives
Address: 10627 Midwest Industrial Boulevard
City/State/Zip Code: Saint Louis, Missouri 63132
Contact: Jeffrey Cosmano
Phone: (314) 785-6425

Removal Date: 10/27/04
Cleaning Date: 12/21/03
Disposal Date: 10/28/04

UST's Removed:	**Tank 1**	**Tank 2**	**Tank 3**	**Tank 4***
Previous Contents:	MEK	LACTOL	DIBK	TOLUENE
Nominal Capacity:	8085	1000	5075	10,040
Dimension (l, d):	21.5 X 8	9 x 5.5	13.5X8	15.5 X 10.5
Tank Material:	STEEL	STEEL	STEEL	STEEL
Observed integrity:	FAIR	FAIR	FAIR	FAIR

UST Cleaning procedure:

Pressure Wash:	X	X	X	X
Triple Rinse:				
Manual Scrape & Shovel:	X	X	X	X
Absorbent (Oil Dry):	X	X	X	X
Solvent Rinse:				
Abrasive Blast:				

* SEE NOTE ON PAGE 2

WOLVERINE GASKET DIVISION
2638 PRINCESS STREET
INKSTER, MICHIGAN 48141
PHONE (313) 562-6400 · FAX (313) 562-5427

SEND ALL INVOICES TO

PURCHASE ORDER REQUISITION / RELEASE

SHIP TO

- [X] INKSTER DIVISION, 2638 PRINCESS ST., INKSTER, MI 48141, (313) 562-6400
- [ ] EP AUTOMOTIVE, 2424 JOHN DALY, INKSTER, MI 48141, (313) 278-5956
- [ ] BLACKSBURG DIVISION, 201 INDUSTRAIL PARK RD. S.E., BLACKSBURG, VA 24060, (540) 552-6082
- [ ] LEESBURG DIVISION, 10825 C.R. 44, LEESBURG, FL 34788, (352) 787-3015
- [ ] CEDAR RUN DIVISION, 3175 STATE STREET, BLACKSBURG, VA 24060, (540) 953-1742

SUPPLIER 21 St. Century Salvage		SUPPLIER#	P.O. NO.
ADDRESS		TELEPHONE	RELEASE NO.
CITY	STATE	ZIP	DATE

FOR DEPT	TO BE USED FOR	CONFIRMED DATE
DEL. REQ.	F.O.B. POINT / TERMS	CONFIRMED TO

QTY.	DESCRIPTION	DEPT.	ACCOUNT CODE	PRICE	U/M
1	Demolish & remove (4)			6,950.00	lot
	Storage tanks, associated				
	piping & pumping Station				
	Proposal 3861 Rev. 1				
	Dated 3-23-04				

SIGNED	APPROVED (DEPT. HEAD)	AUTHORIZED (PURCHASING)

FORM 4MM06126 REV:C

SUPPLIER

MI0012926

WOLVERINE GASKET DIVISION
2638 PRINCESS STREET
INKSTER, MICHIGAN 48141
PHONE (313) 562-6400 FAX (313) 562-5427

SEND ALL INVOICES TO

PURCHASE ORDER REQUISITION / RELEASE

SHIP TO

- [X] INKSTER DIVISION, 2638 PRINCESS ST., INKSTER, MI 48141, (313) 562-6400
- [ ] EP AUTOMOTIVE, 2424 JOHN DALY, INKSTER, MI 48141, (313) 278-5956
- [ ] BLACKSBURG DIVISION, 201 INDUSTRAIL PARK RD. S.E., BLACKSBURG, VA 24060, (540) 552-6082
- [ ] LEESBURG DIVISION, 10825 C.R. 44, LEESBURG, FL 34788, (352) 787-3015
- [ ] CEDAR RUN DIVISION, 3175 STATE STREET, BLACKSBURG, VA 24060, (540) 953-1742

SUPPLIER	21 St. Century Salvage	SUPPLIER#	P.O. NO.
ADDRESS		TELEPHONE	RELEASE NO.
CITY	STATE	ZIP	DATE

FOR DEPT	TO BE USED FOR		CONFIRMED DATE
DEL. REQ.	F.O.B. POINT	TERMS	CONFIRMED TO

QTY.	DESCRIPTION	DEPT.	ACCOUNT CODE	PRICE	U/M
1	Demolish & remove (4)			16,950.00	lot
	Storage tanks, associated				
	piping & pumping Station				
	Proposal 3861 Rev. 1				
	Dated 3-23-04				

SIGNED	APPROVED (DEPT. HEAD)	AUTHORIZED (PURCHASING)

FORM 4MM06126 REV:C

ACCOUNTING

MI0012927

WOLVERINE GASKET DIVISION
2638 PRINCESS STREET
INKSTER, MICHIGAN 48141
PHONE (313) 562-6400 FAX (313) 562-5427

PURCHASE ORDER REQUISITION / RELEASE

SEND ALL INVOICES TO

SHIPPED

- [x] INKSTER DIVISION, 2638 PRINCESS ST., INKSTER, MI 48141, (313) 562-6400
- [ ] EP AUTOMOTIVE, 2424 JOHN DALY, INKSTER, MI 48141, (313) 278-5956
- [ ] BLACKSBURG DIVISION, 201 INDUSTRAIL PARK RD. S.E., BLACKSBURG, VA 24060, (540) 552-6082
- [ ] LEESBURG DIVISION, 10825 C.R. 44, LEESBURG, FL 34788, (352) 787-3015
- [ ] CEDAR RUN DIVISION, 3175 STATE STREET, BLACKSBURG, VA 24060, (540) 953-1742

SUPPLIER 21 St. Century Salvage		SUPPLIER#	P.O. NO.
ADDRESS		TELEPHONE	RELEASE NO.
CITY	STATE	ZIP	DATE

FOR DEPT	TO BE USED FOR	CONFIRMED DATE
DEL. REQ.	F.O.B. POINT / TERMS	CONFIRMED TO

QTY.	DESCRIPTION	DEPT.	ACCOUNT CODE	PRICE	U/M
1	Demolish & remove (4)			6,950.00	lot
	Storage tanks, associated				
	piping & pumping Station				
	Proposal 3861 Rev. 1				
	Dated 3-23-04				

SIGNED	APPROVED (DEPT. HEAD)	AUTHORIZED (PURCHASING)

FORM 4MM06126 REV:C

PURCHASING

MI0012928

WOLVERINE GASKET DIVISION
2638 PRINCESS STREET
INKSTER, MICHIGAN 48141
PHONE (313) 562-6400 FAX (313) 562-5427

SEND ALL INVOICES TO

PURCHASE ORDER REQUISITION / RELEASE

SHIP TO

- [x] INKSTER DIVISION, 2638 PRINCESS ST., INKSTER, MI 48141, (313) 562-6400
- [ ] EP AUTOMOTIVE, 2424 JOHN DALY, INKSTER, MI 48141, (313) 278-5956
- [ ] BLACKSBURG DIVISION, 201 INDUSTRAIL PARK RD. S.E., BLACKSBURG, VA 24060, (540) 552-6082
- [ ] LEESBURG DIVISION, 10825 C.R. 44, LEESBURG, FL 34788, (352) 787-3015
- [ ] CEDAR RUN DIVISION, 3175 STATE STREET, BLACKSBURG, VA 24060, (540) 953-1742

SUPPLIER	21 St. Century Salvage	SUPPLIER#	P.O. NO.
ADDRESS		TELEPHONE	RELEASE NO.
CITY	STATE	ZIP	DATE

FOR DEPT	TO BE USED FOR		CONFIRMED DATE
DEL. REQ.	F.O.B. POINT	TERMS	CONFIRMED TO

QTY.	DESCRIPTION	DEPT.	ACCOUNT CODE	PRICE	U/M
1	Demolish & remove (4)			6,950.00	lot
	Storage tanks, associated				
	piping & pumping Station				
	Proposal 3861 Rev. 1				
	Dated 3-23-04				

SIGNED	APPROVED (DEPT. HEAD)	AUTHORIZED (PURCHASING)

FORM 4MM06126 REV:C

RECEIVING

MI0012929

WOLVERINE GASKET DIVISION
2638 PRINCESS STREET
INKSTER, MICHIGAN 48141
PHONE (313) 562-6400 FAX (313) 562-5427

SEND ALL INVOICES TO

PURCHASE ORDER REQUISITION / RELEASE

SHIP / SHIPPE

- [x] INKSTER DIVISION, 2638 PRINCESS ST., INKSTER, MI 48141, (313) 562-6400
- [ ] EP AUTOMOTIVE, 2424 JOHN DALY, INKSTER, MI 48141, (313) 278-5956
- [ ] BLACKSBURG DIVISION, 201 INDUSTRAIL PARK RD. S.E., BLACKSBURG, VA 24060, (540) 552-6082
- [ ] LEESBURG DIVISION, 10825 C.R. 44, LEESBURG, FL 34788, (352) 787-3015
- [ ] CEDAR RUN DIVISION, 3175 STATE STREET, BLACKSBURG, VA 24060, (540) 953-1742

SUPPLIER	21st Century Salvage	SUPPLIER#	P.O. NO.
ADDRESS		TELEPHONE	RELEASE NO.
CITY	STATE	ZIP	DATE

FOR DEPT	TO BE USED FOR		CONFIRMED DATE
DEL. REQ.	F.O.B. POINT	TERMS	CONFIRMED TO

QTY.	DESCRIPTION	DEPT.	ACCOUNT CODE	PRICE	U/M
1	Demolish & remove (4)			6,950.00	lot
	Storage tanks, associated				
	piping & pumping station				
	Proposal 3861 Rev. 1				
	Dated 3-23-04				

SIGNED	APPROVED (DEPT. HEAD)	AUTHORIZED (PURCHASING)

FORM 4MM06126 REV:C

ORIGINATOR

MI0012930

34835
B4 p.2
3-23-04

Mar 25 04 04:10p

21st Century Salvage, Inc.

10750 Martz Road
Ypsilanti, MI 48197
(734) 485-4855 Phone
(734) 485-6959 Fax

Proposal Number
3861 Rev. 1

Next Generation Services Group

March 23, 2004

Conestoga - Rovers and Associates
Tom Johnson
1446 Sheldon Road, Suite 200
Plymouth, MI. 48170

Regarding: Eagle-Picher Tank Farm Demolition

Dear Tom,

21st Century Salvage, Inc. is pleased to submit the following proposal for the above referenced project. This proposal is based upon a walk through on December 29, 2003. 21st Century Salvage, Inc. proposes to furnish all supervision, labor, equipment, materials, and miscellaneous items required for the removal work as outlined below:

I SCOPE OF WORK:

Demolish and remove four (4) abandoned storage tanks, associated piping and pumping station from within milling room. Remove and dispose of (1) stainless steel mixer.

II PRICE:

Six Thousand Nine Hundred Fifty Dollars.....$6,950.00

III PROJECT SCHEDULE:

A. Utility disconnect work (electrical and/or mechanical) to be performed by others prior to demolition of the subject area.
B. 21st Century Salvage, Inc. shall be allowed to proceed with removals without interruption or delays.
C. This proposal is based on a single day shift, Monday through Friday.

IV ACCESS/EGRESS:

A. Removal, hauling and legal disposal of all non-hazardous/non-special waste resulting from our work is included.

V COMPLETION, BILLINGS, AND PAYMENTS:

A. Upon mobilization, 21st Century Salvage, Inc. will invoice immediately for equipment and materials stored on site. This invoice is due and payable within thirty (30) days.
B. During each successive 30 (thirty) day period, 21st Century Salvage, Inc. will submit a progress billing which is due and payable in 30 (thirty) days.
C. Upon completion 21st Century Salvage, Inc. will submit an invoice for a full amount due, payment of invoice shall be net thirty (30) days.
D. Late payment of 21st Century Salvage, Inc. invoice will incur a 1 1/2 % late charge.

VI SPECIAL CONDITIONS:

A. This proposal includes one million ($1,000,000.00) / two million ($2,000,000.00) general liability insurance coverage with a five million ($5,000,000.00) umbrella.

B. Removal/handling/disposals of PCB's, lead paint, asbestos or potentially hazardous and/or special waste materials, *inclusive of soils encountered*, are not included in this proposal.

C. Salvage of existing equipment for owner or other contractors is not included in this proposal.

D. Patching and/or restoration of painted surfaces, floors, roofing penetrations, cleaning, grinding or finishing are not included in this proposal.

E. Disconnects, capping, purging and/or rerouting of any components are to be completed by the Owner prior to 21st Century Salvage, Inc. removal activities.

F. Removal of snow, tenant debris, weather protection, fencing, guarding or de-watering is not included in this proposal.

G. Shoring or bracing is not included in this proposal.

H. Owner to provide temporary electrical service, lighting or heat as required.

I. Owner to provide an asbestos and lead survey to 21st Century Salvage, Inc. prior to performance of work.

J. The cost for the permits as issued by the city, state, or any other jurisdiction having authority are by others.

K. Establishing, maintaining, or removing any temporary protection measures is by others.

L. Testing of any suspect materials, inclusive of soils, is by others.

M. Work under this proposal is limited to the footprint of the building unless otherwise noted.

VII ASSUMPTIONS:

A. All scrap generated by 21st Century Salvage, Inc. removal activities shall become the property of 21st Century Salvage, Inc.

B. 21st Century Salvage, Inc. shall use torches and any other equipment that they deem necessary.

We would like to thank you for the opportunity to submit this proposal. Should you have any questions or require additional information, please do not hesitate to contact our office.

Sincerely,
21ST CENTURY SALVAGE, INC.

Joseph M. Klosterman
Vice President

cc: Bid File 3861 Rev. 1

CONESTOGA-ROVERS & ASSOCIATES

14496 Sheldon Road, Suite #200
Plymouth, Michigan 48170
Telephone: (734) 453-5123 Fax: (734) 453-5201
www.CRAworld.com

FACSIMILE

DATE: March 30, 2004

REFERENCE NO.: 34835

TO: Doug Rommeck

FACSIMILE NO.: (313) 562-8248

FROM: Brad Gallant

Total Pages (Including Cover Page) 3

☒ **Facsimile is Receiver's Original**

Original Will Follow By:

☐ Mail
☐ Overnight Courier
☐ E-mail

MESSAGE

Proposal for limited oversight and documentation of AST System removal by 21st Century.

I believe that you and Tom had discussed having 21st Centruty contract with CRA to complete the work. However, due to liability concerns in a case where CRA would not have constant supervisory control over the work, we have included only oversight and documentation in this Propsal. 21st Century will invoice you directly for thier portion of the work in the same manner as when removed the curing oven.

Give Tom or myself a call with any quesitons.

THIS FAX TRANSMISSION IS INTENDED ONLY FOR THE ADDRESSEE(S) SHOWN ON THIS FORM AND MAY CONTAIN CONFIDENTIAL OR PRIVILEGED INFORMATION FROM CONESTOGA-ROVERS & ASSOCIATES (CRA). ANY DISCLOSURE, COPYING, DISTRIBUTION, OR USE OF THE CONTENTS OF THIS FAX, WITHOUT THE CONSENT OF CRA, IS PROHIBITED. IF YOU HAVE RECEIVED THIS TRANSMISSION IN ERROR, PLEASE NOTIFY US IMMEDIATELY BY TELEPHONE (COLLECT).

REGISTERED COMPANY FOR ISO 9001 ENGINEERING DESIGN

EQUAL EMPLOYMENT OPPORTUNITY EMPLOYER

CONESTOGA-ROVERS
& ASSOCIATES

14496 Sheldon Road, Suite #200, Plymouth, MI 48170
Telephone: 734-453-5123 Facsimile: 734-453-5201
www.crawork.com

March 30, 2004

Reference No. 34835

Mr. Doug Rommeck
Eagle Picher Automotive
2424 John Daly Rd.
Inkster, MI. 48141

Dear Mr. Rommeck:

Re: Proposal for Professional Services
Limited Oversight and Documentation of AST System Removal
Eagle Picher Automotive
Inkster, Michigan

Conestoga-Rovers & Associates (CRA) is pleased to present this Proposal for Professional Services (Proposal) to provide limited oversight and documentation of Aboveground Storage Tank (AST) System Removal Services for Eagle Picher. The Services will be provided at the Wolverine Gasket Division Facility located at 2424 John Daly Rd. in Inkster, Michigan (Site).

This Proposal is presented in the following titled sections:

Section 1.0	Scope of Work
Section 2.0	Cost Estimate
Section 3.0	Schedule

1.0 SCOPE OF WORK

This Scope of Work (SOW) has been prepared based on conversations between Eagle Picher and CRA.

CRA will conduct brief daily inspections of the work while in progress. The objective of the daily inspections will be to document the work being performed by a third party demolition contractor, identify to Eagle Picher any apparent or potential compliance issues observed during removal activities, and to confirm that wastes and recyclable materials are being managed properly. At the conclusion of the AST System removal activities, CRA will prepare a brief letter report summarizing the work performed at the Site.

CONESTOGA-ROVERS
& ASSOCIATES

March 30, 2004

Reference No. 34835

2.0 COST ESTIMATE

The Services described in Section 1.0 shall be provided on a time and materials basis, and will not exceed $600.00 without prior approval from Eagle Picher. CRA does not charge a premium for overtime, weekend, or holiday work necessary to meet client deadlines. CRA does not charge for return travel time from Project Sites.

3.0 SCHEDULE

CRA will schedule the Services described above upon written acceptance of this Proposal.

To authorize CRA to proceed with the Scope of Work described above, please sign and date in the space provided below, and fax to the attention of Tom Johnson at (734) 453-5201.

Printed Name	*Signatures*	*Date*

We very much appreciate the opportunity to present this Proposal to Eagle Picher. Please feel free to contact the undersigned at (734) 453-5123 should you require clarification or further information on any aspect of this Proposal.

Yours truly,

CONESTOGA-ROVERS & ASSOCIATES

Brad Gallant

for Tom Johnson

BG/kk/2/PR/Det.
Encl.

c.c.: Brad Gallant, CRA

CONESTOGA-ROVERS
& ASSOCIATES

14496 Sheldon Road, Suite #200, Plymouth, MI 48170
Telephone: 734-453-5123 Facsimile: 734-453-5201
www.CRAworld.com

March 30, 2004 Reference No. 34835

Mr. Doug Rommeck
Eagle Picher Automotive
2424 John Daly Rd.
Inkster, MI. 48141

Dear Mr. Rommeck:

Re: Proposal for Professional Services
Limited Oversight and Documentation of AST System Removal
Eagle Picher Automotive
Inkster, Michigan

Conestoga-Rovers & Associates (CRA) is pleased to present this Proposal for Professional Services (Proposal) to provide limited oversight and documentation of Aboveground Storage Tank (AST) System Removal Services for Eagle Picher. The Services will be provided at the Wolverine Gasket Division Facility located at 2424 John Daly Rd. in Inkster, Michigan (Site).

This Proposal is presented in the following titled sections:

Section 1.0 Scope of Work
Section 2.0 Cost Estimate
Section 3.0 Schedule

1.0 SCOPE OF WORK

This Scope of Work (SOW) has been prepared based on conversations between Eagle Picher and CRA.

CRA will conduct brief daily inspections of the work while in progress. The objective of the daily inspections will be to document the work being performed by a third party demolition contractor, identify to Eagle Picher any apparent or potential compliance issues observed during removal activities, and to confirm that wastes and recyclable materials are being managed properly. At the conclusion of the AST System removal activities, CRA will prepare a brief letter report summarizing the work performed at the Site.

CONESTOGA-ROVERS
& ASSOCIATES

2.0 COST ESTIMATE

The Services described in Section 1.0 shall be provided on a time and materials basis, and will not exceed $600.00 without prior approval from Eagle Picher. CRA does not charge a premium for overtime, weekend, or holiday work necessary to meet client deadlines. CRA does not charge for return travel time from Project Sites.

3.0 SCHEDULE

CRA will schedule the Services described above upon written acceptance of this Proposal.

To authorize CRA to proceed with the Scope of Work described above, please sign and date in the space provided below, and fax to the attention of Tom Johnson at (734) 453-5201.

Printed Name	*Signatures*	*Date*

We very much appreciate the opportunity to present this Proposal to Eagle Picher. Please feel free to contact the undersigned at (734) 453-5123 should you require clarification or further information on any aspect of this Proposal.

Yours truly,

CONESTOGA-ROVERS & ASSOCIATES

Brad Gallant

for Tom Johnson

BG/kk/2/PR/Det.
Encl.

c.c.: Brad Gallant, CRA

34835
B4 p.2
3-23-04

Mar 25 04 04:10p

21st Century Salvage, Inc.

10750 Martz Road
Ypsilanti, MI 48197
(734) 485-4855 Phone
(734) 485-6959 Fax

Next Generation Services Group

Proposal Number
3861 Rev. 1

March 23, 2004

Conestoga - Rovers and Associates
Tom Johnson
1446 Sheldon Road, Suite 200
Plymouth, MI. 48170

Regarding: Eagle-Picher Tank Farm Demolition

Dear Tom,

21st Century Salvage, Inc. is pleased to submit the following proposal for the above referenced project. This proposal is based upon a walk through on December 29, 2003. 21st Century Salvage, Inc. proposes to furnish all supervision, labor, equipment, materials, and miscellaneous items required for the removal work as outlined below:

I **SCOPE OF WORK:**

Demolish and remove four (4) abandoned storage tanks, associated piping and pumping station from within milling room. Remove and dispose of (1) stainless steel mixer.

II **PRICE:**

Six Thousand Nine Hundred Fifty Dollars.....$6,950.00

III **PROJECT SCHEDULE:**

A. Utility disconnect work (electrical and/or mechanical) to be performed by others prior to demolition of the subject area.
B. 21st Century Salvage, Inc. shall be allowed to proceed with removals without interruption or delays.
C. This proposal is based on a single day shift, Monday through Friday.

IV **ACCESS/EGRESS:**

A. Removal, hauling and legal disposal of all non-hazardous/non-special waste resulting from our work is included.

V **COMPLETION, BILLINGS, AND PAYMENTS:**

A. Upon mobilization, 21st Century Salvage, Inc. will invoice immediately for equipment and materials stored on site. This invoice is due and payable within thirty (30) days.
B. During each successive 30 (thirty) day period, 21st Century Salvage, Inc. will submit a progress billing which is due and payable in 30 (thirty) days.
C. Upon completion 21st Century Salvage, Inc. will submit an invoice for a full amount due, payment of invoice shall be net thirty (30) days.
D. Late payment of 21st Century Salvage, Inc. invoice will incur a 1 1/2 % late charge.

VI SPECIAL CONDITIONS:

A. This proposal includes one million ($1,000,000.00) / two million ($2,000,000.00) general liability insurance coverage with a five million ($5,000,000.00) umbrella.

B. Removal/handling/disposals of PCB's, lead paint, asbestos or potentially hazardous and/or special waste materials, *inclusive of soils encountered*, are not included in this proposal.

C. Salvage of existing equipment for owner or other contractors is not included in this proposal.

D. Patching and/or restoration of painted surfaces, floors, roofing penetrations, cleaning, grinding or finishing are not included in this proposal.

E. Disconnects, capping, purging and/or rerouting of any components are to be completed by the Owner prior to 21st Century Salvage, Inc. removal activities.

F. Removal of snow, tenant debris, weather protection, fencing, guarding or de-watering is not included in this proposal.

G. Shoring or bracing is not included in this proposal.

H. Owner to provide temporary electrical service, lighting or heat as required.

I. Owner to provide an asbestos and lead survey to 21st Century Salvage, Inc. prior to performance of work.

J. The cost for the permits as issued by the city, state, or any other jurisdiction having authority are by others.

K. Establishing, maintaining, or removing any temporary protection measures is by others.

L. Testing of any suspect materials, inclusive of soils, is by others.

M. Work under this proposal is limited to the footprint of the building unless otherwise noted.

VII ASSUMPTIONS:

A. All scrap generated by 21st Century Salvage, Inc. removal activities shall become the property of 21st Century Salvage, Inc.

B. 21st Century Salvage, Inc. shall use torches and any other equipment that they deem necessary.

We would like to thank you for the opportunity to submit this proposal. Should you have any questions or require additional information, please do not hesitate to contact our office.

Sincerely,
21ST CENTURY SALVAGE, INC.

Joseph M. Klosterman
Vice President

cc: Bid File 3861 Rev. 1

CONESTOGA-ROVERS & ASSOCIATES

14496 Sheldon Road, Suite #200
Plymouth, Michigan 48170
Telephone: (734) 453-5123 Fax: (734) 453-5201
www.CRAworld.com

FACSIMILE

DATE: JANUARY 13, 2003

REFERENCE NO.: 400002

TO: DOUG RANNEK

FACSIMILE NO.: 313-278-3546

FROM: TOM JOHNSON

Total Pages (Including Cover Page) 2

☑ Facsimile is Receiver's Original

Original Will Follow By:

☐ Mail
☐ Overnight Courier
☐ E-mail

MESSAGE

ENCLOSED COSTS FROM INLAND WATERS POLLUTION CONTROL, INC. @ $6,950.00 CAN GET PRICING PROBABLY TO $6,500 AND IF NEEDED CRA COULD WRITE SUMMARY LETTER OF DECOMMISSION/REMOVAL FOR $500 ±

LET ME KNOW THOUGHTS A LATER DATE

THANKS,

TOM JOHNSON

THIS FAX TRANSMISSION IS INTENDED ONLY FOR THE ADDRESSEE(S) SHOWN ON THIS FORM AND MAY CONTAIN CONFIDENTIAL OR PRIVILEGED INFORMATION FROM CONESTOGA-ROVERS & ASSOCIATES (CRA). ANY DISCLOSURE, COPYING, DISTRIBUTION, OR USE OF THE CONTENTS OF THIS FAX, WITHOUT THE CONSENT OF CRA, IS PROHIBITED. IF YOU HAVE RECEIVED THIS TRANSMISSION IN ERROR, PLEASE NOTIFY US IMMEDIATELY BY TELEPHONE (COLLECT).

REGISTERED COMPANY FOR ISO 9001 ENGINEERING DESIGN

EQUAL EMPLOYMENT OPPORTUNITY EMPLOYER

INLAND WATERS
POLLUTION
CONTROL, INC.

VIA FAX
734/453-5201

January 12, 2004

Mr. Thomas D. Johnson
CONESTOGA-ROVERS & ASSOCIATES
14496 Sheldon road, Suite #200
Plymouth, Michigan 48170

Re: Eagle Picher
AST Removal
Inkster, MI

Dear Mr. Johnson:

Inland Waters Pollution Control, Inc. (IWPC) is pleased to provide pricing for asbestos aboveground storage tank removal services.

Scope of Work

1) Mobilize and demobilize equipment and personnel.
2) Remove, load and dispose/recycle four(4) above ground storage tanks and associated piping. One each 8,000 gallon, 1,500 gallon, 5,000 gallon and 10,000 gallon. Tanks and piping have previously been cleaned and no additional cleaning is included in this proposal. Secondary containment is to remain.

Note: Wall repair is not included in scope of work. No below grade or electrical disconnect work is anticipated or included in the above scope of work.

IWPC agrees to provide tasks #1 through #2 above for **Six Thousand Nine Hundred Fifty Dollars ($6,950.00).**

If you have any questions, please do not hesitate to contact me at 313/841-5800 ext. 210.

Sincerely,

INLAND WATERS POLLUTION CONTROL, INC.

Kenneth A. Moberly
Project Estimator

2021 South Schaefer Highway
Detroit, Michigan 48217
734•479•3205
800•922•9118 (24 hour service)

CONESTOGA-ROVERS & ASSOCIATES

14496 Sheldon Road, Suite #200
Plymouth, Michigan 48170
Telephone: (734) 453-5123 Fax: (734) 453-5201
www.CRAworld.com

FACSIMILE

DATE: January 6, 2004

REFERENCE NO.: 34835

TO: Doug Rommeck

FACSIMILE NO.: (313) 562-8248

FROM: BG Brad Gallant

Total Pages (Including Cover Page) 3

☒ **Facsimile is Receiver's Original**

Original Will Follow By:

☐ Mail
☐ Overnight Courier
☐ E-mail

MESSAGE

Attached is a quotation from 21st Century Salvage for demolition and removal of the four aboveground storage tanks.

THIS FAX TRANSMISSION IS INTENDED ONLY FOR THE ADDRESSEE(S) SHOWN ON THIS FORM AND MAY CONTAIN CONFIDENTIAL OR PRIVILEGED INFORMATION FROM CONESTOGA-ROVERS & ASSOCIATES (CRA). ANY DISCLOSURE, COPYING, DISTRIBUTION, OR USE OF THE CONTENTS OF THIS FAX, WITHOUT THE CONSENT OF CRA, IS PROHIBITED. IF YOU HAVE RECEIVED THIS TRANSMISSION IN ERROR, PLEASE NOTIFY US IMMEDIATELY BY TELEPHONE (COLLECT).

REGISTERED COMPANY FOR ISO 9001 ENGINEERING DESIGN

EQUAL EMPLOYMENT OPPORTUNITY EMPLOYER

21st Century Salvage, Inc.
10750 Martz Road
Ypsilanti, MI 48197
(734) 485-4855 Phone
(734) 485-6959 Fax

Next Generation Services Group

Proposal Number
3861

January 6, 2004

Conestoga – Rovers and Associates
Tom Johnson
1446 Sheldon Road, Suite 200
Plymouth, MI. 48170

Regarding: Eagle-Picher Tank Farm Demolition

Dear Tom,

21st Century Salvage, Inc. is pleased to submit the following proposal for the above referenced project. This proposal is based upon a walk through on December 29, 2003. 21st Century Salvage, Inc. proposes to furnish all supervision, labor, equipment, materials, and miscellaneous items required for the removal work as outlined below:

I **SCOPE OF WORK:**
Demolish and remove four (4) abandoned storage tanks, associated piping and pumping station from within milling room.

II **PRICE:**
Nine Thousand Five Hundred Dollars $9,500.00

III **PROJECT SCHEDULE:**
A. Utility disconnect work (electrical and/or mechanical) to be performed by others prior to demolition of the subject area.
B. 21st Century Salvage, Inc. shall be allowed to proceed with removals without interruption or delays.
C. This proposal is based on a single day shift, Monday through Friday.

IV **ACCESS/EGRESS:**
A. Removal, hauling and legal disposal of all non-hazardous/non-special waste resulting from our work is included.

V **COMPLETION, BILLINGS, AND PAYMENTS:**
A. Upon mobilization, 21st Century Salvage, Inc. will invoice immediately for equipment and materials stored on site. This invoice is due and payable within thirty (30) days.
B. During each successive 30 (thirty) day period, 21st Century Salvage, Inc. will submit a progress billing which is due and payable in 30 (thirty) days.
C. Upon completion 21st Century Salvage, Inc. will submit an invoice for a full amount due, payment of invoice shall be net thirty (30) days.
D. Late payment of 21st Century Salvage, Inc. invoice will incur a 1 1/2 % late charge.

VI SPECIAL CONDITIONS:

A. This proposal includes one million ($1,000,000.00) / two million ($2,000,000.00) general liability insurance coverage with a five million ($5,000,000.00) umbrella.

B. Removal/handling/disposals of PCB's, lead paint, asbestos or potentially hazardous and/or special waste materials, *inclusive of soils encountered*, are not included in this proposal.

C. Salvage of existing equipment for owner or other contractors is not included in this proposal.

D. Patching and/or restoration of painted surfaces, floors, roofing penetrations, cleaning, grinding or finishing are not included in this proposal.

E. Disconnects, capping, purging and/or rerouting of any components are to be completed by the Owner prior to 21st Century Salvage, Inc. removal activities.

F. Removal of snow, tenant debris, weather protection, fencing, guarding or de-watering is not included in this proposal.

G. Shoring or bracing is not included in this proposal.

H. Owner to provide temporary electrical service, lighting or heat as required.

I. Owner to provide an asbestos and lead survey to 21st Century Salvage, Inc. prior to performance of work.

J. The cost for the permits as issued by the city, state, or any other jurisdiction having authority are by others.

K. Establishing, maintaining, or removing any temporary protection measures is by others.

L. Testing of any suspect materials, inclusive of soils, is by others.

M. Work under this proposal is limited to the footprint of the building unless otherwise noted.

VII ASSUMPTIONS:

A. All scrap generated by 21st Century Salvage, Inc. removal activities shall become the property of 21st Century Salvage, Inc.

B. 21st Century Salvage, Inc. shall use torches and any other equipment that they deem necessary.

We would like to thank you for the opportunity to submit this proposal. Should you have any questions or require additional information, please do not hesitate to contact our office.

Sincerely,
21ST CENTURY SALVAGE, INC.

Keith Miller
Operations Manager

cc: Bid File 3861

CONESTOGA-ROVERS
& ASSOCIATES

14496 Sheldon Road, Suite #200, Plymouth, MI 48170
Telephone: 734-453-5123 Facsimile: 734-453-5201
www.CRAworld.com

September 13, 2004 Reference No. 37248

Mr. Doug Rommeck
EaglePicher Automotive
2424 John Daly Road
Inkster, Michigan 48141

Dear Mr. Rommeck:

Re: Soil Removal Oversight
EaglePicher Automotive
Wolverine Gasket Division
Inkster, Michigan

Conestoga-Rovers & Associates (CRA) is providing this Proposal for Professional Services (Proposal) to provide third party field oversight associated with the removal of soil from the soil pile for EaglePicher Automotive (EaglePicher) for the facility located at 2638 Princess St. in Inkster, Michigan (Site). This proposal describes the recommended scope of work and cost estimate to provide third party oversight of the soil removal activities.

This Proposal is presented in the following titled sections:

Section 1.0 Scope of Work
Section 2.0 Cost Estimate
Section 3.0 Schedule

1.0 SCOPE OF WORK

CRA will collect a composite soil sample from the upper 2-1/2 feet of the soil pile for laboratory analysis of SPLP VOCs. EaglePicher's contractor will remove approximately 2 to 2-1/2 half feet of soil from the top of the soil pile (up to 450 yards) and stockpile this soil on-Site to be used as backfill at a later time. The goal is to obtain approximately 450 yards of relatively clean soil that can be used to fill the final excavation back to grade. The stockpiled soil should have a liner both above and below it to prevent any possible cross-contamination across the site.

EaglePicher's contractor will then excavate the remainder of the soil pile and to a depth of 2 feet directly beneath the pile (total of approximately 700 yards). The soil that is being excavated will be screened for impact using field observations including, at a minimum, visual, olfactory, monitoring with a PID, and a chlorobenzene specific field test (drager tube). CRA will use historical analytical results and field observations to assess whether the soil may be hazardous.

If field monitoring indicates potentially characteristic hazardous soils may be present, EaglePicher will be notified and the potentially hazardous soils will be segregated.

EaglePicher's contractor will load, transport, and dispose of the soil. EaglePicher's contractor will backfill the open excavation with the stockpiled soil, obtained from the top 2 to 2-1/2 feet of the original soil pile, assuming the SPLP VOC results are below applicable MDEQ Part 201 Industrial criteria.

CRA will perform field monitoring, documentation, and reporting. CRA will prepare a Memorandum for EaglePicher summarizing the field activities and analytical results, and include copies of waste manifests and landfill receipts.

2.0 COST ESTIMATE

The estimated project costs are included below. CRA will invoice EaglePicher on a time and materials, not to exceed basis. CRA's cost estimate is based on five days of field oversight.

CRA Costs

• Field Oversight and Project Management	$4,500
• Lab Costs	$500
• Field Equipment, Truck Rental, Air Monitoring Equipment	$1,500
• Memorandum Preparation	$500
Total CRA Costs	$7,000.00

The rate for CRA's field technician will be $67 / hour.

3.0 SCHEDULE

CRA will commence the Services described above upon written acceptance of this Proposal. It is anticipated that the soil excavation and removal activities can be completed within one week.

CONESTOGA-ROVERS
& ASSOCIATES

We appreciate the opportunity to present this Proposal to EaglePicher. Please feel free to contact the undersigned at (734) 453-5123 should you require clarification or further information on any aspect of this Proposal.

Yours truly,

CONESTOGA-ROVERS & ASSOCIATES

Thomas M. Kinney

Thomas M. Kinney, CPG

TK/eb/1/PR/Det.

c.c.: Tom Johnson, CRA
Fred Blickle, CRA

MI0012947

SEVERN TRENT LABORATORIES, INC.

PRELIMINARY DATA SUMMARY

The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Conestoga Rovers & Assoc., Inc PAGE 1

Lot #: A4I240399 EAGLE PICHER/WOLVERINE GASKET **Date Reported:** 10/08/04

Project Number: 37248

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD	
Client Sample ID: S-37248-092304-BF-034					
Sample #: 001 Date Sampled: 09/23/04 10:20 Date Received: 09/24/04 Matrix: SOLID					
Volatile Organics by GC/MS SPLPE					In Review
Benzene	ND	1.0	ug/L	SW846 8260B	
Carbon tetrachloride	ND	1.0	ug/L	SW846 8260B	
Chlorobenzene	ND	1.0	ug/L	SW846 8260B	
Chloroform	ND	1.0	ug/L	SW846 8260B	
1,2-Dichloroethane	ND	1.0	ug/L	SW846 8260B	
1,1-Dichloroethylene	ND	1.0	ug/L	SW846 8260B	
Methyl ethyl ketone	ND	10	ug/L	SW846 8260B	
Tetrachloroethylene	ND	1.0	ug/L	SW846 8260B	
Trichloroethylene	ND	1.0	ug/L	SW846 8260B	
Vinyl chloride	ND	1.0	ug/L	SW846 8260B	
Inorganic Analysis					Reviewed
Total Residue as Percent Solids	**91.9**	**10.0**	**%**	**MCAWW 160.3 MOD**	
Client Sample ID: S-37248-092304-BF-035					
Sample #: 002 Date Sampled: 09/23/04 10:40 Date Received: 09/24/04 Matrix: SOLID					
Volatile Organics by GC/MS SPLPE					In Review
Benzene	ND	1.0	ug/L	SW846 8260B	
Carbon tetrachloride	ND	1.0	ug/L	SW846 8260B	
Chlorobenzene	**1.5**	**1.0**	**ug/L**	**SW846 8260B**	
Chloroform	ND	1.0	ug/L	SW846 8260B	
1,2-Dichloroethane	ND	1.0	ug/L	SW846 8260B	
1,1-Dichloroethylene	ND	1.0	ug/L	SW846 8260B	
Methyl ethyl ketone	ND	10	ug/L	SW846 8260B	
Tetrachloroethylene	ND	1.0	ug/L	SW846 8260B	
Trichloroethylene	ND	1.0	ug/L	SW846 8260B	
Vinyl chloride	ND	1.0	ug/L	SW846 8260B	
Inorganic Analysis					Reviewed
Total Residue as Percent Solids	**91.4**	**10.0**	**%**	**MCAWW 160.3 MOD**	

Rommeck, Doug

From: Kinney, Tom [tkinney@craworld.com]
Sent: Wednesday, October 20, 2004 8:04 AM
To: Rommeck, Doug
Cc: Filing
Subject: FW: 35298 - US EPA UIC Number MI-163-5X26-0052

The EPA approved our minor change to the original Class V well inventory information (see below).

We are planning on being on Site next Tuesday & preparing for the injection into the excavation on Thursday the 28th.

-----Original Message-----
From: Micham.Ross@epamail.epa.gov [mailto:Micham.Ross@epamail.epa.gov]
Sent: Tuesday, October 19, 2004 5:47 PM
To: Kinney, Tom
Subject: Re: US EPA UIC Number MI-163-5X26-0052

I appreciate your getting back to me with the details for the proposed changes to the previously submitted Class V well inventory information.
As you mention in your email, in our conversation earlier today I approved the update to the submittal.

Thank you for your message.

Ross Micham, Geologist
Underground Injection Control Branch
U.S. EPA, Region 5
312/886-4237

"Kinney, Tom"
<tkinney@craworl
d.com>

10/19/2004 04:26
PM

To
To
Ross Micham/R5/USEPA/US@EPA
cc

bcc

Fax to

Subject
US EPA UIC Number
MI-163-5X26-0052

This e-mail is being sent in regards to the phone conversation we had today. You verbally approved the change described below for the EaglePicher, Wolverine Gasket Division facility at 2638 Princess Street, Inkster, Michigan.

We plan to make a slight adjustment to the well construction we will utilize for the injections. Instead of using a Geoprobe & injecting directly through the Geoprobe rods, we will set temporary wells and inject through the temporary wells. The same approximate injection depths and approximately 70-75 locations will be utilized. The temporary wells (typically 6 feet deep) will consist of 1-inch diameter PVC with 2 to 5 feet long, 0.020-inch machine slotted screens and silica sand (Global #5) with a hydrated bentonite chip seal. Some of the wells will have a flush mount box and concrete surface seal.

Please respond to this e-mail with your written approval of this change.

Thanks for your quick response in advance.

Thomas M. Kinney, C.P.G.
Conestoga-Rovers & Associates
14496 Sheldon Road
Suite 200
Plymouth, Michigan 48170
Phone (734) 453-5123
Fax (734) 453-5201
e-mail: tkinney@CRAworld.com
Web: www.CRAworld.com <http://www.CRAworld.com> Equal Employment Opportunity Employer

MI0012950

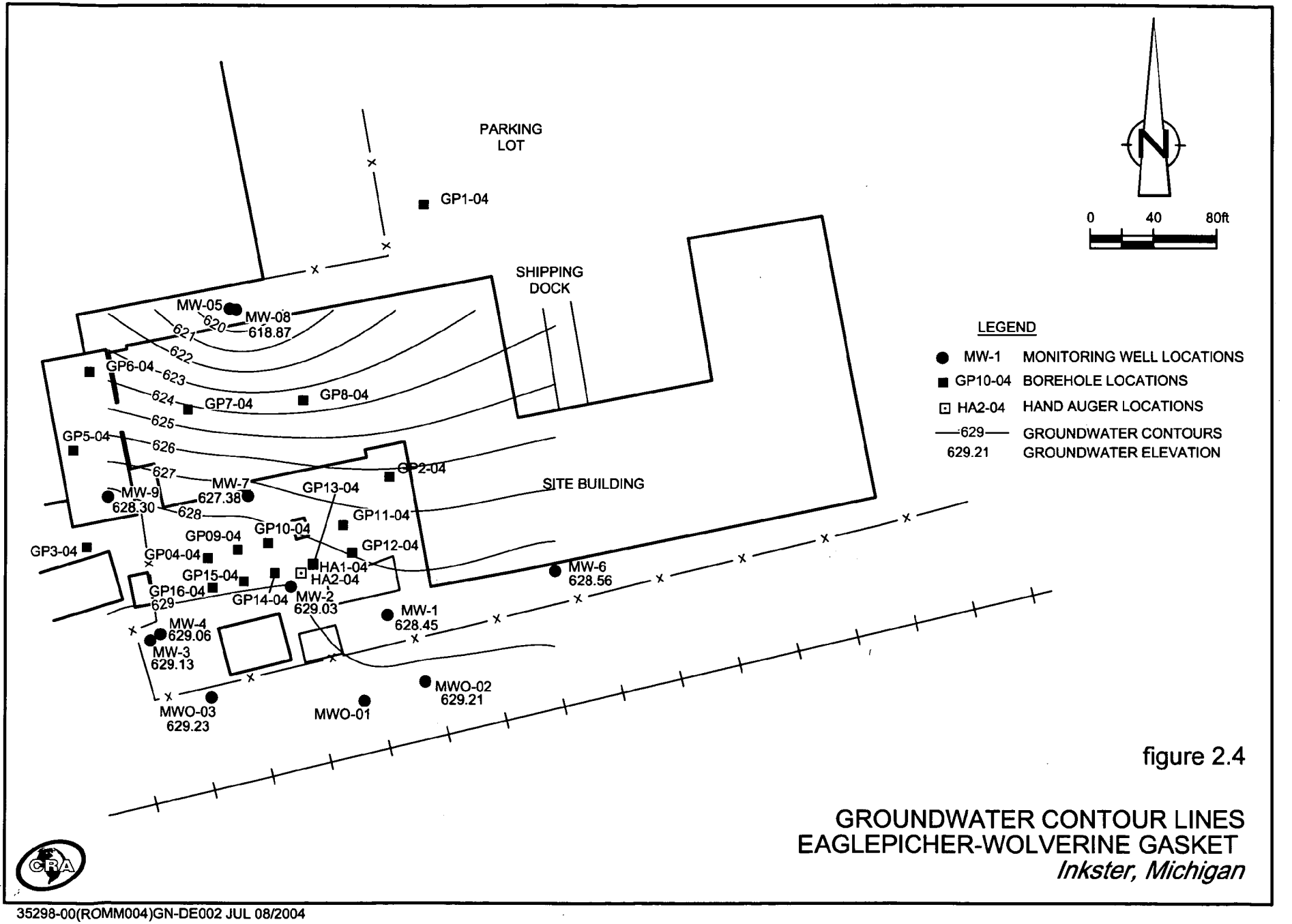


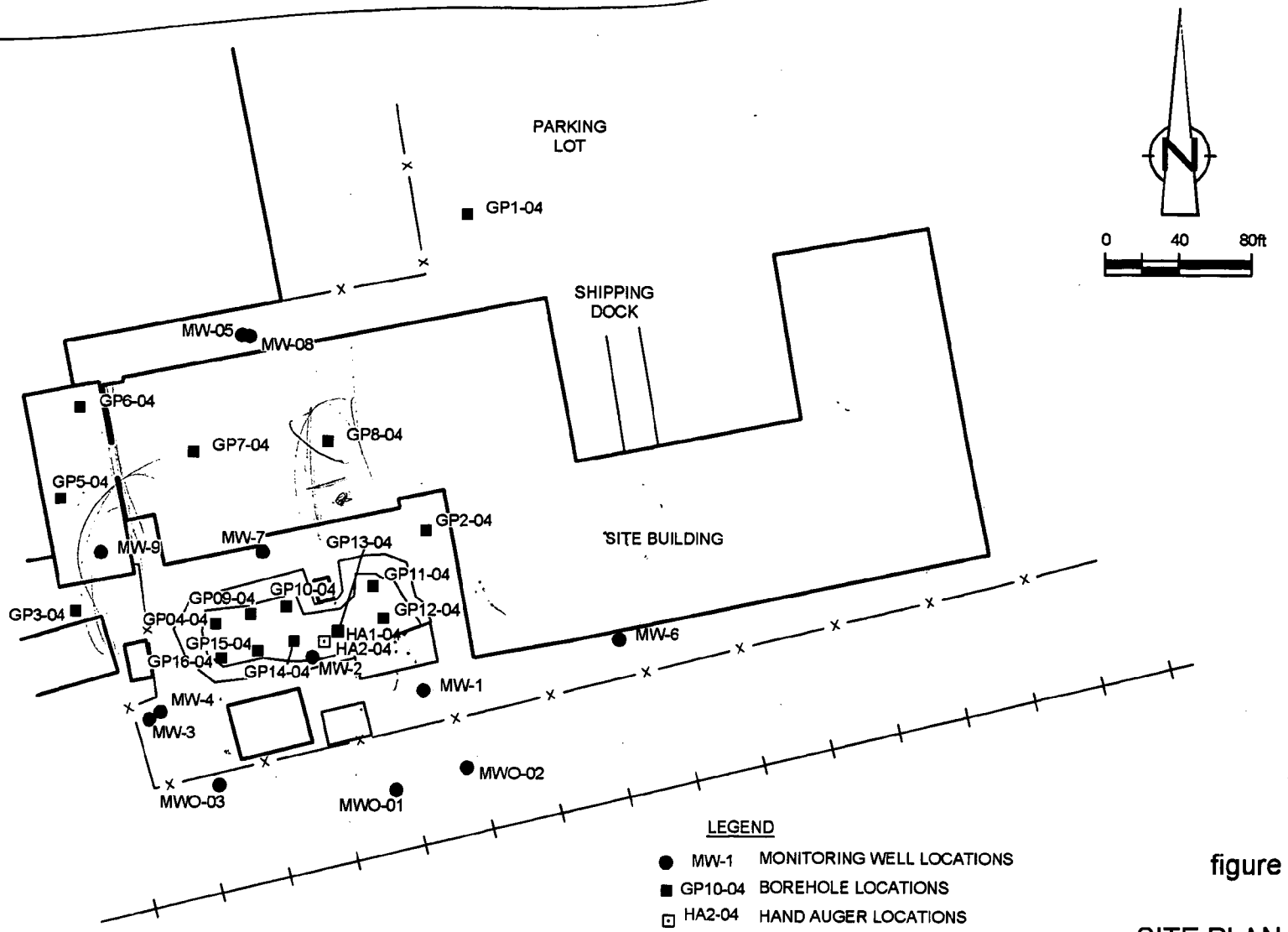
figure 2.4

GROUNDWATER CONTOUR LINES
EAGLEPICHER-WOLVERINE GASKET
Inkster, Michigan

35298-00(ROMM004)GN-DE002 JUL 08/2004

MI0012951

Drill loss mw-9



LEGEND

- ● MW-1 MONITORING WELL LOCATIONS
- ■ GP10-04 BOREHOLE LOCATIONS
- ⊡ HA2-04 HAND AUGER LOCATIONS

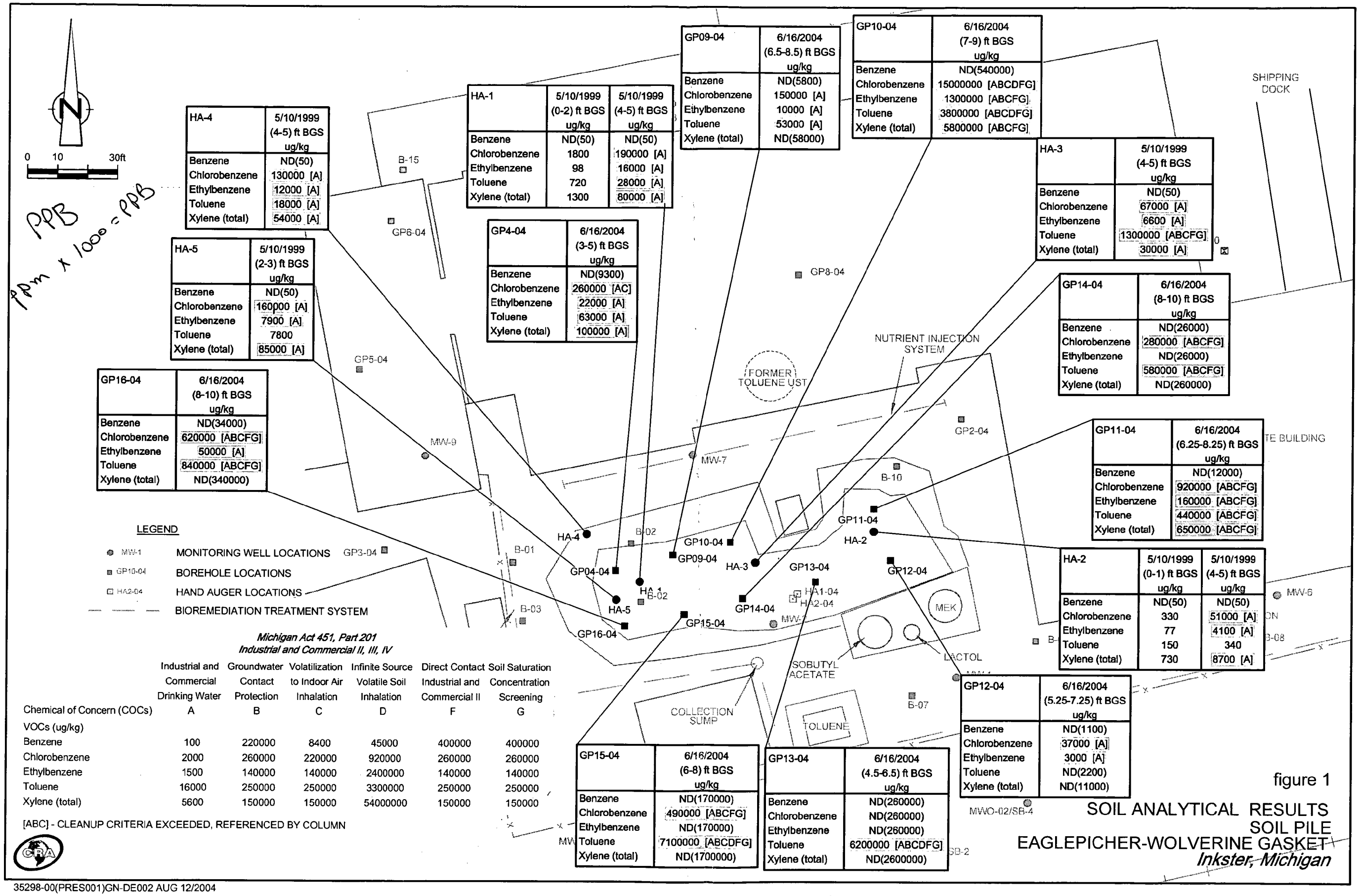
figure

DRAFT

SITE PLAN
WOLVERINE GASKET INKSTER
Inkster, Michigan

35298-00(SOURCE)GN-BA001 JUL 09/2004

MI0012952



HA-4	5/10/1999 (4-5) ft BGS ug/kg
Benzene	ND(50)
Chlorobenzene	130000 [A]
Ethylbenzene	12000 [A]
Toluene	18000 [A]
Xylene (total)	54000 [A]

HA-5	5/10/1999 (2-3) ft BGS ug/kg
Benzene	ND(50)
Chlorobenzene	160000 [A]
Ethylbenzene	7900 [A]
Toluene	7800
Xylene (total)	85000 [A]

GP16-04	6/16/2004 (8-10) ft BGS ug/kg
Benzene	ND(34000)
Chlorobenzene	620000 [ABCFG]
Ethylbenzene	50000 [A]
Toluene	840000 [ABCFG]
Xylene (total)	ND(340000)

HA-1	5/10/1999 (0-2) ft BGS ug/kg	5/10/1999 (4-5) ft BGS ug/kg
Benzene	ND(50)	ND(50)
Chlorobenzene	1800	190000 [A]
Ethylbenzene	98	16000 [A]
Toluene	720	28000 [A]
Xylene (total)	1300	80000 [A]

GP4-04	6/16/2004 (3-5) ft BGS ug/kg
Benzene	ND(9300)
Chlorobenzene	260000 [AC]
Ethylbenzene	22000 [A]
Toluene	63000 [A]
Xylene (total)	100000 [A]

GP09-04	6/16/2004 (6.5-8.5) ft BGS ug/kg
Benzene	ND(5800)
Chlorobenzene	150000 [A]
Ethylbenzene	10000 [A]
Toluene	53000 [A]
Xylene (total)	ND(58000)

GP10-04	6/16/2004 (7-9) ft BGS ug/kg
Benzene	ND(540000)
Chlorobenzene	15000000 [ABCDFG]
Ethylbenzene	1300000 [ABCFG]
Toluene	3800000 [ABCDFG]
Xylene (total)	5800000 [ABCFG]

HA-3	5/10/1999 (4-5) ft BGS ug/kg
Benzene	ND(50)
Chlorobenzene	67000 [A]
Ethylbenzene	6600 [A]
Toluene	1300000 [ABCFG]
Xylene (total)	30000 [A]

GP14-04	6/16/2004 (8-10) ft BGS ug/kg
Benzene	ND(26000)
Chlorobenzene	280000 [ABCFG]
Ethylbenzene	ND(26000)
Toluene	580000 [ABCFG]
Xylene (total)	ND(260000)

GP11-04	6/16/2004 (6.25-8.25) ft BGS ug/kg
Benzene	ND(12000)
Chlorobenzene	920000 [ABCFG]
Ethylbenzene	160000 [ABCFG]
Toluene	440000 [ABCFG]
Xylene (total)	650000 [ABCFG]

HA-2	5/10/1999 (0-1) ft BGS ug/kg	5/10/1999 (4-5) ft BGS ug/kg
Benzene	ND(50)	ND(50)
Chlorobenzene	330	51000 [A]
Ethylbenzene	77	4100 [A]
Toluene	150	340
Xylene (total)	730	8700 [A]

GP12-04	6/16/2004 (5.25-7.25) ft BGS ug/kg
Benzene	ND(1100)
Chlorobenzene	37000 [A]
Ethylbenzene	3000 [A]
Toluene	ND(2200)
Xylene (total)	ND(11000)

GP15-04	6/16/2004 (6-8) ft BGS ug/kg
Benzene	ND(170000)
Chlorobenzene	490000 [ABCFG]
Ethylbenzene	ND(170000)
Toluene	7100000 [ABCDFG]
Xylene (total)	ND(1700000)

GP13-04	6/16/2004 (4.5-6.5) ft BGS ug/kg
Benzene	ND(260000)
Chlorobenzene	ND(260000)
Ethylbenzene	ND(260000)
Toluene	6200000 [ABCDFG]
Xylene (total)	ND(2600000)

Michigan Act 451, Part 201
Industrial and Commercial II, III, IV

Chemical of Concern (COCs)	Industrial and Commercial Drinking Water A	Groundwater Contact Protection B	Volatilization to Indoor Air Inhalation C	Infinite Source Volatile Soil Inhalation D	Direct Contact Industrial and Commercial II F	Soil Saturation Concentration Screening G
VOCs (ug/kg)						
Benzene	100	220000	8400	45000	400000	400000
Chlorobenzene	2000	260000	220000	920000	260000	260000
Ethylbenzene	1500	140000	140000	2400000	140000	140000
Toluene	16000	250000	250000	3300000	250000	250000
Xylene (total)	5600	150000	150000	54000000	150000	150000

[ABC] - CLEANUP CRITERIA EXCEEDED, REFERENCED BY COLUMN

figure 1

SOIL ANALYTICAL RESULTS
SOIL PILE
EAGLEPICHER-WOLVERINE GASKET
Inkster, Michigan

35298-00(PRES001)GN-DE002 AUG 12/2004

MI0012953

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
SOUTHEAST MICHIGAN DISTRICT OFFICE

JENNIFER M. GRANHOLM
GOVERNOR

STEVEN E. CHESTER
DIRECTOR

July 18, 2005

Mr. Douglas Rommeck, Manager
Health, Safety and Environment
EaglePitcher™ Automotive
2424 John Daly Road
Inkster, Michigan 48141

Dear Mr. Rommeck:

SUBJECT: Response to Department of Environmental Quality May 4, 2005 Letter
Location: Wolverine Gasket - Inkster
2638 Princess Street, Inkster, Wayne County, Michigan
Facility ID No. 5-0005434
Confirmed Release No. C-0085-05

The Department of Environmental Quality (DEQ), Remediation and Redevelopment Division (RRD) is in receipt of a letter dated July 6, 2005, written and submitted by Conestoga-Rovers & Associates (CRA) on behalf of EaglePitcher™ Automotive. According to the CRA letter, it was submitted as a response to the RRD letter dated May 4, 2005 (copy enclosed). The RRD May 4, 2005, letter was associated with a request from EaglePitcher™ Automotive to address the above-referenced confirmed release under Part 201, Environmental Remediation, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (NREPA).

The RRD May 4, 2005, letter requested certain information be submitted for review (refer to the bulleted items on Page 2 of the letter) in order for the RRD to consider your request to perform corrective actions pursuant to Part 201 in lieu of corrective actions pursuant to Part 213, Leaking Underground Storage Tanks, of the NREPA. The letter from CRA outlines a scope of work and a time frame in which the work will be conducted. According to the CRA letter, the information requested by the RRD in the May 4, 2005, letter will be submitted after the activities outlined in the work plan have been completed.

Upon submittal of the reports referred to by CRA in their letter as the "UST field investigation summary report" and the "Part 201 Remedial Activities Summary", the RRD will again review and consider your request to perform corrective actions pursuant to Part 201.

If you have any questions with regard to this issue, please feel free to contact me at the number listed below.

Sincerely,

Oladipo Oyinsan, District Supervisor
Southeast Michigan District Office
Remediation and Redevelopment Division
586-753-3800

Enclosure

cc: Mr. Steven Kilter, DEQ
Ms. Jeanne Schlaufman, DEQ
Mr. Paul Owens, DEQ

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
SOUTHEAST MICHIGAN DISTRICT OFFICE

JENNIFER M. GRANHOLM
GOVERNOR

STEVEN E. CHESTER
DIRECTOR

JS

May 4, 2005

Mr. Douglas Rommeck, Manager
Health, Safety and Environment
EaglePitcher™ Automotive
2424 John Daly Road
Inkster, Michigan 48141

Dear Mr. Rommeck:

SUBJECT: Request to Address Part 213 Release under Part 201
Location: Wolverine Gasket - Inkster
2638 Princess Street, Inkster, Wayne County, Michigan
Facility ID No. 5-0005434
Confirmed Release No. C-0085-05

The Department of Environmental Quality (DEQ), Remediation and Redevelopment Division (RRD) is in receipt of your letter dated April 14, 2005, on behalf of EaglePitcher™ Automotive, in which you are requesting to conduct the corrective actions necessary to address the above-referenced release pursuant to Part 201, Environmental Remediation, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (NREPA). The release referenced above is currently regulated pursuant to Part 213, Leaking Underground Storage Tanks, of the NREPA and was confirmed on January 6, 2005.

Section 21304a(5) of the NREPA does allow that if a release or threat of release at a site is not solely the result of a release or threat of a release from an underground storage tank (UST) system, the owner or operator of the UST system may choose to perform response activities pursuant to Part 201 in lieu of corrective actions pursuant to Part 213. However, your request was not accompanied by information that contamination at the facility is both from the regulated UST and a Part 201 source or solely from Part 201 sources.

Your letter indicates that data for samples collected from locations around the tank do not appear to indicate an additional source (i.e., a release from the tank), except that your letter also indicates that the previous existence of the tank was unknown and therefore the contents of the UST would also be unknown. It is possible that the hazardous substance(s) formerly stored in the UST are different than those which have been identified as sources of contamination in previous investigations, and that there was a release of hazardous substances from the UST which are different and distinct from the previously documented releases at the property.

In addition, your letter indicates that the Wolverine Gasket-Inkster facility is currently undertaking remedial actions pursuant to Part 201 of the NREPA. The appropriate RRD staff and file were consulted and RRD staff indicated that the last report received for this facility was a Subsurface Investigation Results, dated December of 2002. The RRD file does not contain

any information which indicates that remedial actions at Wolverine Gasket-Inkster facility have been conducted (since 2002) and continue to address the contamination on the site, or that the selected remedial actions are or will be effective in remediating the contamination to acceptable levels.

In order to consider your request to conduct the necessary corrective actions and pursue closure of the Part 213 confirmed release under Part 201, the following documentation should be submitted to the RRD for review:

- Submit a site diagram which depicts the location of the UST in relation to the areas of the site for which corrective actions are being conducted pursuant to Part 201.

- Provide copies of the analytical data or other documentation which demonstrates that the contaminants present adjacent/near to the UST are the same as those which been identified in other source areas of the site. The documentation should indicate that the samples (soil and groundwater, if present) collected from the immediate area of the UST were analyzed for the full scan of volatile organic compounds and semi-volatile compounds (including polynuclear aromatic hydrocarbons) and that no other contaminants beyond those already detected are present as a result of a release from the UST.

- Provide a report which documents the remedial activities that have been and will continue to be conducted pursuant to Part 201 to bring the site to closure.

Upon the submittal of the above information, the RRD will again review and consider your request to perform corrective actions pursuant to Part 201 in lieu of corrective actions pursuant to Part 213.

Your letter also indicates that the UST will be cleaned and properly closed in place only after the acceptance by the DEQ of the request to address the confirmed release pursuant to Part 201. Please be advised that the UST itself is regulated under Part 211, Underground Storage Tanks, of the NREPA and that there are specific requirements and time frames in which the specific requirements must be addressed. Failure by EaglePitcher™ Automotive to address the UST appropriately and in a timely manner may put them in violation of Part 211.

If you have any questions with regard to this issue, please feel free to contact me at the number listed below.

Sincerely,

Oladipo Oyinsan, District Supervisor
Southeast Michigan District Office
Remediation and Redevelopment Division
586-753-3800

cc: Mr. Steven Kilter, DEQ
Ms. Jeanne Schlaufman, DEQ
Mr. Paul Owens, DEQ

CONESTOGA-ROVERS
& ASSOCIATES

14496 Sheldon Road, Suite #200, Plymouth, MI 48170
Telephone: 734-453-5123 Facsimile: 734-453-5201
www.CRAworld.com

July 6, 2005 Reference No. 35298

Mr. Oladipo Oyinsan, District Supervisor
Michigan Department of Environmental Quality
Southeast Michigan District Office
27700 Donald Court
Warren, Michigan 48092-2793

Dear Mr. Oyinsan:

Re: Response to MDEQ Letter Dated May 4, 2005
Request to Address Part 213 Release under Part 201
EaglePicher Automotive
Wolverine Gasket Division
2638 Princess Street
Inkster, Michigan

Conestoga-Rovers & Associates, Inc. (CRA) is providing this response to the Michigan Department of Environmental Quality's (MDEQ's) letter to EaglePicher Automotive (EaglePicher), dated May 4, 2005. The letter was associated with a request from EaglePicher to address the Part 213 Release under Part 201 for the facility located at 2638 Princess Street in Inkster, Michigan (Site).

A UST was encountered on November 4, 2004 beneath the floor of the Wolverine Gasket building (see Figure 1). The UST is immediately west of the location where a former toluene UST had reportedly been removed in the early 1960's from beneath the building. The UST was encountered during drilling operations associated with the installation of injection wells. The injection wells were being installed to treat groundwater impacted by volatile organic compounds (VOCs), primarily benzene, toluene, ethylbenzene, xylenes (BTEX), and chlorobenzene (ongoing remediation being conducted under Part 201). The concrete and fill material was removed from above a portion of the UST and EaglePicher collected a water sample from inside the UST on December 28, 2004 (groundwater that has accumulated in the UST). Based on the laboratory results of the water sample, EaglePicher notified the MDEQ of a confirmed release on January 6, 2005. The results of the water sample indicate that chlorobenzene (62.757 ppm) and toluene (20.303 ppm) were present at relatively high levels and benzene (2.379 ppm), ethylbenzene (3.539 ppm), and xylenes (5.993 ppm) were also present at elevated levels. These constituents are the same constituents that have been detected at the site previously.

The known contamination is present primarily in the areas south of the building and beneath the building. An underground pipeline going from the former Lactol aboveground storage

tank (AST) to the building had a documented release. The reports on file state that the Lactol consisted of a mixture of constituents, with toluene and xylenes being the primary constituents. CRA performed an on-line review of MSDSs that indicate toluene is typically present at between 10 and 18 percent of Lactol spirits. The underground Lactol piping was removed and free product was pumped out of the excavation in 1983. The release from this Lactol pipeline appears to have been the primary source of the soil and groundwater contamination at the Site.

Additionally, an UST that reportedly contained toluene was removed in the early 1960's from beneath the building and may have been an additional source of the Site contamination.

A closed-loop perched water treatment system was installed and operated starting in 1992 and was shut down prior to 1999. The perched water was collected from a recovery trench near the southern property line, pumped to a collection building north of well MW-2, supplemented with hydrogen peroxide and nutrients, and then re-injected into an infiltration gallery or "trench" located immediately south of the recently located UST and the southern wall of the Wolverine Gasket building.

Based on nearby monitoring wells, the depth to perched groundwater in the vicinity of the UST varies from approximately 0.5 to 2.0 feet below ground surface (bgs). Groundwater is present in a shallow perched water-bearing zone that appears to flow to the north beneath the building. Sandy soils are typically present within the upper 1.5 feet bgs near the southern end of the building and to 5.5 feet bgs near the southern property line. Clays and silty clays are present beneath this surficial perched water-bearing sand and are greater than 20 feet thick.

EaglePicher requested to conduct the necessary corrective actions under Part 201 rather than Part 213, due to ongoing remediation under Part 201. The MDEQ requested additional information be provided before they will consider whether to handle the UST release under Part 201. Additionally, the MDEQ documented that the UST needs to be properly closed-in-place as required under Part 211. This letter describes the activities and schedule that EaglePicher intends to implement in response to the MDEQ's letter and to properly close the UST.

This letter is presented in the following titled sections:

Section 1.0 Scope of Work
Section 2.0 Schedule

1.0 SCOPE OF WORK

This Scope of Work (SOW) has been prepared based on a review of the May 4, 2005 letter from the MDEQ and conversations between EaglePicher and CRA. The SOW will consist of the following tasks:

Task 1	Complete field investigations to assess soil and groundwater adjacent to the UST;
Task 2	Close the UST in place;
Task 3	Prepare a report that summarizes field activities associated with the UST; and
Task 4	Prepare a report that summarizes the remedial activities that have been and will continue to be conducted under Part 201 to bring the Site to closure.

1.1 UST FIELD INVESTIGATIONS

Soil and groundwater samples will be collected from two locations within the building, immediately adjacent to the UST (depending on accessibility, one to the east and one to the west). The concrete will be cored and manual tools (hand auger) will be utilized to collect a soil sample from each boring and to set a 1-inch diameter well in each borehole. One unsaturated soil sample and one groundwater sample will be collected from each location. The soil and groundwater samples will be analyzed for TCL VOCs and semi-volatile organic compounds (SVOCs). One trip blank and one duplicate sample will be analyzed to provide quality control.

1.2 CLOSE UST

The UST is scheduled to be closed-in-place in August 2005, contingent upon MDEQ approval.

1.3 UST REPORTING

A report will be prepared for the MDEQ that documents the results of the UST field investigations and the UST closure activities. Additionally, the analytical results will be compared to the results from the ongoing remediation being conducted under Part 201.

1.4 PART 201 REMEDIAL ACTIVITIES SUMMARY

A report will be prepared for the MDEQ that summarizes remedial activities conducted at the Site. This will include the historical remedial activities in addition to activities conducted since December of 2002. Additionally, a plan of future remedial activities and associated performance monitoring activities will be provided. A schedule of the planned activities will be included.

2.0 SCHEDULE

EaglePicher will commence the services described above following the schedule described below:

Task 1 – UST field investigation	August, 2005
Task 2 – UST closure	August, 2005
Task 3 – UST field investigation summary report	October, 2005
Task 4 – Part 201 Remedial Activities Summary	October, 2005

Please feel free to contact Doug Rommeck of EaglePicher at (313) 724-2006 should you require clarification or further information on any aspect of this Response to MDEQ Letter Dated May 4, 2005.

Yours truly,

CONESTOGA-ROVERS & ASSOCIATES

Thomas Kinney

Thomas M. Kinney, C.P.G.

TK/1/Det.

c.c.: Doug Rommeck, EaglePicher

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
SOUTHEAST MICHIGAN DISTRICT OFFICE

JENNIFER M. GRANHOLM
GOVERNOR

STEVEN E. CHESTER
DIRECTOR

MAY 10 2005

May 4, 2005

Mr. Douglas Rommeck, Manager
Health, Safety and Environment
EaglePitcher™ Automotive
2424 John Daly Road
Inkster, Michigan 48141

Dear Mr. Rommeck:

SUBJECT: Request to Address Part 213 Release under Part 201
Location: Wolverine Gasket - Inkster
2638 Princess Street, Inkster, Wayne County, Michigan
Facility ID No. 5-0005434
Confirmed Release No. C-0085-05

The Department of Environmental Quality (DEQ), Remediation and Redevelopment Division (RRD) is in receipt of your letter dated April 14, 2005, on behalf of EaglePitcher™ Automotive, in which you are requesting to conduct the corrective actions necessary to address the above-referenced release pursuant to Part 201, Environmental Remediation, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (NREPA). The release referenced above is currently regulated pursuant to Part 213, Leaking Underground Storage Tanks, of the NREPA and was confirmed on January 6, 2005.

Section 21304a(5) of the NREPA does allow that if a release or threat of release at a site is not solely the result of a release or threat of a release from an underground storage tank (UST) system, the owner or operator of the UST system may choose to perform response activities pursuant to Part 201 in lieu of corrective actions pursuant to Part 213. However, your request was not accompanied by information that contamination at the facility is both from the regulated UST and a Part 201 source or solely from Part 201 sources.

Your letter indicates that data for samples collected from locations around the tank do not appear to indicate an additional source (i.e., a release from the tank), except that your letter also indicates that the previous existence of the tank was unknown and therefore the contents of the UST would also be unknown. It is possible that the hazardous substance(s) formerly stored in the UST are different than those which have been identified as sources of contamination in previous investigations, and that there was a release of hazardous substances from the UST which are different and distinct from the previously documented releases at the property.

In addition, your letter indicates that the Wolverine Gasket-Inkster facility is currently undertaking remedial actions pursuant to Part 201 of the NREPA. The appropriate RRD staff and file were consulted and RRD staff indicated that the last report received for this facility was a Subsurface Investigation Results, dated December of 2002. The RRD file does not contain

any information which indicates that remedial actions at Wolverine Gasket-Inkster facility have been conducted (since 2002) and continue to address the contamination on the site, or that the selected remedial actions are or will be effective in remediating the contamination to acceptable levels.

In order to consider your request to conduct the necessary corrective actions and pursue closure of the Part 213 confirmed release under Part 201, the following documentation should be submitted to the RRD for review:

- Submit a site diagram which depicts the location of the UST in relation to the areas of the site for which corrective actions are being conducted pursuant to Part 201.

- Provide copies of the analytical data or other documentation which demonstrates that the contaminants present adjacent/near to the UST are the same as those which been identified in other source areas of the site. The documentation should indicate that the samples (soil and groundwater, if present) collected from the immediate area of the UST were analyzed for the full scan of volatile organic compounds and semi-volatile compounds (including polynuclear aromatic hydrocarbons) and that no other contaminants beyond those already detected are present as a result of a release from the UST.

- Provide a report which documents the remedial activities that have been and will continue to be conducted pursuant to Part 201 to bring the site to closure.

Upon the submittal of the above information, the RRD will again review and consider your request to perform corrective actions pursuant to Part 201 in lieu of corrective actions pursuant to Part 213.

Your letter also indicates that the UST will be cleaned and properly closed in place only after the acceptance by the DEQ of the request to address the confirmed release pursuant to Part 201. Please be advised that the UST itself is regulated under Part 211, Underground Storage Tanks, of the NREPA and that there are specific requirements and time frames in which the specific requirements must be addressed. Failure by EaglePitcher™ Automotive to address the UST appropriately and in a timely manner may put them in violation of Part 211.

If you have any questions with regard to this issue, please feel free to contact me at the number listed below.

Sincerely,

Oladipo Oyinsan, District Supervisor
Southeast Michigan District Office
Remediation and Redevelopment Division
586-753-3800

cc: Mr. Steven Kilter, DEQ
Ms. Jeanne Schlaufman, DEQ
Mr. Paul Owens, DEQ

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
SOUTHEAST MICHIGAN DISTRICT OFFICE

JENNIFER M. GRANHOLM
GOVERNOR

STEVEN E. CHESTER
DIRECTOR

MAY 10 2005

May 4, 2005

Mr. Douglas Rommeck, Manager
Health, Safety and Environment
EaglePitcher™ Automotive
2424 John Daly Road
Inkster, Michigan 48141

Dear Mr. Rommeck:

SUBJECT: Request to Address Part 213 Release under Part 201
Location: Wolverine Gasket - Inkster
2638 Princess Street, Inkster, Wayne County, Michigan
Facility ID No. 5-0005434
Confirmed Release No. C-0085-05

The Department of Environmental Quality (DEQ), Remediation and Redevelopment Division (RRD) is in receipt of your letter dated April 14, 2005, on behalf of EaglePitcher™ Automotive, in which you are requesting to conduct the corrective actions necessary to address the above-referenced release pursuant to Part 201, Environmental Remediation, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (NREPA). The release referenced above is currently regulated pursuant to Part 213, Leaking Underground Storage Tanks, of the NREPA and was confirmed on January 6, 2005.

Section 21304a(5) of the NREPA does allow that if a release or threat of release at a site is not solely the result of a release or threat of a release from an underground storage tank (UST) system, the owner or operator of the UST system may choose to perform response activities pursuant to Part 201 in lieu of corrective actions pursuant to Part 213. However, your request was not accompanied by information that contamination at the facility is both from the regulated UST and a Part 201 source or solely from Part 201 sources.

Your letter indicates that data for samples collected from locations around the tank do not appear to indicate an additional source (i.e., a release from the tank), except that your letter also indicates that the previous existence of the tank was unknown and therefore the contents of the UST would also be unknown. It is possible that the hazardous substance(s) formerly stored in the UST are different than those which have been identified as sources of contamination in previous investigations, and that there was a release of hazardous substances from the UST which are different and distinct from the previously documented releases at the property.

In addition, your letter indicates that the Wolverine Gasket-Inkster facility is currently undertaking remedial actions pursuant to Part 201 of the NREPA. The appropriate RRD staff and file were consulted and RRD staff indicated that the last report received for this facility was a Subsurface Investigation Results, dated December of 2002. The RRD file does not contain

any information which indicates that remedial actions at Wolverine Gasket-Inkster facility have been conducted (since 2002) and continue to address the contamination on the site, or that the selected remedial actions are or will be effective in remediating the contamination to acceptable levels.

In order to consider your request to conduct the necessary corrective actions and pursue closure of the Part 213 confirmed release under Part 201, the following documentation should be submitted to the RRD for review:

- Submit a site diagram which depicts the location of the UST in relation to the areas of the site for which corrective actions are being conducted pursuant to Part 201.

- Provide copies of the analytical data or other documentation which demonstrates that the contaminants present adjacent/near to the UST are the same as those which been identified in other source areas of the site. The documentation should indicate that the samples (soil and groundwater, if present) collected from the immediate area of the UST were analyzed for the full scan of volatile organic compounds and semi-volatile compounds (including polynuclear aromatic hydrocarbons) and that no other contaminants beyond those already detected are present as a result of a release from the UST.

- Provide a report which documents the remedial activities that have been and will continue to be conducted pursuant to Part 201 to bring the site to closure.

Upon the submittal of the above information, the RRD will again review and consider your request to perform corrective actions pursuant to Part 201 in lieu of corrective actions pursuant to Part 213.

Your letter also indicates that the UST will be cleaned and properly closed in place only after the acceptance by the DEQ of the request to address the confirmed release pursuant to Part 201. Please be advised that the UST itself is regulated under Part 211, Underground Storage Tanks, of the NREPA and that there are specific requirements and time frames in which the specific requirements must be addressed. Failure by EaglePitcher™ Automotive to address the UST appropriately and in a timely manner may put them in violation of Part 211.

If you have any questions with regard to this issue, please feel free to contact me at the number listed below.

Sincerely,

Oladipo Oyinsan, District Supervisor
Southeast Michigan District Office
Remediation and Redevelopment Division
586-753-3800

cc: Mr. Steven Kilter, DEQ
Ms. Jeanne Schlaufman, DEQ
Mr. Paul Owens, DEQ

EaglePicher™ Automotive

April 14, 2005

Jeanne Schlaufman
SE Michigan District Office
27700 Donald Court
Warren, MI 48092-2793

RE: Facility ID No. 50005434, Confirmed Release No. C-0085-05
Wolverine Gasket-Inkster
2638 Princess St. Inkster, MI 48141, Wayne County

Dear Ms. Schlaufman,

Per our phone conference on 4/6/05, this letter will outline the information regarding the recently reported UST located at the Wolverine Gasket-Inkster facility. The information is in reference to the 3/18/05 letter from Jim Lucas-MIDEQ and the reported release dated 1/14/05.

The Wolverine Gasket-Inkster facility is currently undertaking remedial action as a Part 201 site, Site ID: 82000215. The tank in question is located inside of the zone of impact, inside the facility and underneath the operating floor. Indications of a tank were discovered during installation of a monitoring well-as part of the site remediation. There were no prior records or indication of a UST in this location.

In an attempt to confirm a UST, a section of the floor was removed and the top of the tank was exposed. The UST has an opening at the top and currently appears to be filled with groundwater. A release from the tank cannot, however, be confirmed. To the contrary, analytical data of soil and groundwater in and around the tank indicate constituents and levels of contamination identical to those found throughout the impacted property. Sources of contamination have been previously identified and delineated. The data from locations around the tank do not indicate an additional source, i.e. a release from the tank, but rather are consistent with previously documented releases at the property.

For the above reasons, I would request that the corrective actions under part 213, as outlined in the 3/18/05 letter, be removed as a requirement. The UST has not been linked as source of contamination for the site. The site will address all corrective action through the Part 201 requirements, including documenting the closure of the UST. Pending acceptance from the MIDEQ, the UST will be opened; groundwater removed, cleaned and filled in-place.

2424 John Daly Road; Inkster, Michigan 48141
(313) 278-5956, (313) 278-3546 fax

InkUSTII

EaglePicher™ Automotive

Please respond if this action is acceptable to the State of Michigan. If I can provide any additional information, please contact me at 313/724-2006. Thank you.

Sincerely,

Douglas Rommeck

Manager-Health, Safety and Environment
EaglePicher Automotive
(313) 724-2006
(313) 278-3546 fax
(517) 610-1136 mobile
doug.rommeck@eaglepicher.com
www.eaglepicher.com

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING

JENNIFER M. GRANHOLM
GOVERNOR

STEVEN E. CHESTER
DIRECTOR

March 18, 2005

CERTIFIED MAIL

EaglePicher Automotive-Wolverine Gasket
2638 Princess St
Inkster, MI 48141

Dear EaglePicher Automotive-Wolverine Gasket :

SUBJECT: Facility ID No. 50005434, Confirmed Release No. C-0085-05
Wolverine Gasket-Inkster
2638 Princess St, Inkster, MI 48141, Wayne County

On January 14, 2005, the Department of Environmental Quality (DEQ), Waste and Hazardous Materials Division (WHMD), was notified of a release of a regulated substance from an underground storage tank (UST) system at the subject location. Enclosed is a copy of the confirmed release report.

As the owner or operator of this facility with a reported release, you are responsible for hiring a qualified underground storage tank consultant to conduct all appropriate corrective actions at this location, including submission of reports by the deadlines set forth in Part 213, Leaking Underground Storage Tanks, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. If you do not agree that you are responsible for conducting corrective actions at this facility, you may submit supporting documentation to the Remediation and Redevelopment Division (RRD) of the DEQ within 30 days from receipt of this letter that demonstrates that you were not responsible for the release.

The RRD may audit or oversee all aspects of corrective actions undertaken pursuant to Part 213. Please be advised that the owner or operator may be subject to penalties for not submitting the reports outlined in Part 213. In addition, Section 21324 of Part 213 provides that a person who submits, or causes to be submitted, false or misleading information may be prosecuted for fraud.

Please note that you are required to notify the WHMD of any changes to your UST system using the form EQP3821 Registration of Underground Storage Tanks.

Please include the facility identification number in any further communications with the DEQ. Correspondence, including reports required under Part 213, should be submitted to the RRD SE Michigan District Office, 27700 Donald Court, Warren, MI 48092-2793. Should you have questions regarding this letter, or need additional information, please contact the SE Michigan District Office at (586) 753-3700.

Sincerely,

Jim Lucas
Storage Tank Unit
Waste and Hazardous Materials Division

Enclosures

cc: SE Michigan District Office, RRD

24 Hour Violation

DEQ

MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY – WASTE AND HAZARDOUS MATERIALS DIVISION
PO BOX 30157, LANSING, MI 48909-7657, Phone 517-335-2690, Fax 517-336-2245, E-mail DEQ-STD-TANKS@state.mi.us

5000543

RELEASE REPORT: ☐ SUSPECTED ☒ CONFIRMED

THIS INFORMATION IS REQUIRED UNDER 1994 PA 451, AS AMENDED (Act 451). FAILURE TO COMPLY WITH THE PROVISIONS OF THIS ACT MAY RESULT IN A MISDEMEANOR AND/OR CIVIL FINE NOT TO EXCEED $5000 PER DAY, PER TANK.

INSTRUCTIONS: This form applies to releases of petroleum and hazardous substances from underground storage tanks regulated under Part 211, Underground Storage Tanks, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (PA 451).

The owner or operator must report suspected and confirmed releases to the Waste And Hazardous Materials Division (WHMD) within 24 hours of discovery. The report may be made by a consultant on behalf of the owner/operator. Phone 1-800-MICHIGAN, FAX this form to 517-336-2245, or submit the web form from the WHMD web site www.state.mi.us/std. All information on this form must be provided regardless of whether the release is reported by telephone, FAX, or web form. For further information see Page 2.

WHMD USE ONLY	
FACILITY ID: 50005434	ENTRY DATE: 3/15/05
UPGRADE/CANCEL DATE	INCIDENT NUMBER: C-0085-05
DATE REPORTED: 1/14/05	TIME REPORTED: 12:36 ☐ AM ☒ PM
REPORTED BY: ☐ PHONE ☒ FAX ☐ VOICE MAIL ☐ E-MAIL ☐ REGULAR MAIL	
James C Lynn	
Signature	

PERSON REPORTING RELEASE: Doug Rommeck	COMPANY (IF NOT OWNER/OPERATOR)	TELEPHONE NUMBER: (313 724-2006
TANK REMOVAL CONTRACTOR	CONTRACTOR CONTACT	CONTRACTOR TELEPHONE NUMBER: ( )

I. OWNERSHIP OF TANKS			II. LOCATION OF TANKS			
NAME OF OWNER (CORPORATION, INDIVIDUAL, ETC.): EaglePicher Automotive-Wolverine Gasket			FACILITY NAME OR COMPANY SITE IDENTIFIER: Wolverine Gasket-Inkster			
STREET ADDRESS: 2638 Princess St.			STREET ADDRESS (P O Box Not Acceptable): 2638 Princess St.			
CITY: Inkster	STATE: MI	ZIP CODE: 48141	CITY: Inkster	COUNTY: Wayne	STATE: MI	ZIP CODE: 48141
TELEPHONE NUMBER: (313) 724-2006			TELEPHONE NUMBER: (313) 724-2006			
DATE RELEASE DISCOVERED: 1/6/05 TIME RELEASE DISCOVERED: ☐ AM ☒ PM			CONTACT PERSON FOR LOCATION: Doug Rommeck			
TANK NUMBER[1] (if known)	unknown					
SIZE OF TANK (gallons)	unknown					
SUBSTANCE RELEASED	unkown					
CAUSE OF RELEASE (Check all that apply)	☒ Tank ☐ Piping ☐ Spill Protection ☐ Overfill Protection ☐ Dispenser ☐ Unknown ☐ Other (provide details in comments)	☐ Tank ☐ Piping ☐ Spill Protection ☐ Overfill Protection ☐ Dispenser ☐ Unknown ☐ Other (provide details in comments)	☐ Tank ☐ Piping ☐ Spill Protection ☐ Overfill Protection ☐ Dispenser ☐ Unknown ☐ Other (provide details in comments)	☐ Tank ☐ Piping ☐ Spill Protection ☐ Overfill Protection ☐ Dispenser ☐ Unknown ☐ Other (provide details in comments)	☐ Tank ☐ Piping ☐ Spill Protection ☐ Overfill Protection ☐ Dispenser ☐ Unknown ☐ Other (provide details in comments)
HOW WAS LEAK DETECTED (Check all that apply)	☐ Tank Removal ☐ Inventory Records ☐ Repairs ☐ Stained Soil ☐ Petroleum Odors ☒ Analytical Data ☐ Free Product and/or Oil Sheen in Groundwater	☐ Tank Removal ☐ Inventory Records ☐ Repairs ☐ Stained Soil ☐ Petroleum Odors ☐ Analytical Data ☐ Free Product and/or Oil Sheen in Groundwater	☐ Tank Removal ☐ Inventory Records ☐ Repairs ☐ Stained Soil ☐ Petroleum Odors ☐ Analytical Data ☐ Free Product and/or Oil Sheen in Groundwater	☐ Tank Removal ☐ Inventory Records ☐ Repairs ☐ Stained Soil ☐ Petroleum Odors ☐ Analytical Data ☐ Free Product and/or Oil Sheen in Groundwater	☐ Tank Removal ☐ Inventory Records ☐ Repairs ☐ Stained Soil ☐ Petroleum Odors ☐ Analytical Data ☐ Free Product and/or Oil Sheen in Groundwater

COMMENTS (attach additional sheets if necessary):

Site is under active remediation, listed 201 site.

DISTRIBUTION: WHMD, FACILITY FILE, DISTRICT OFFICE, OWNER

[1] Copy this page for additional tanks if needed.

EQP 3626 (REV 11/2002)

DEQ MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY – WASTE AND HAZARDOUS MATERIALS DIVISION
PO BOX 30157, LANSING, MI 48909-7657, Phone 517-335-2690, Fax 517-335-2245, E-mail DEQ-STD-TANKS@state.mi.us

RELEASE REPORT: ☐ *SUSPECTED* ☒ *CONFIRMED*

THIS INFORMATION IS REQUIRED UNDER 1994 PA 451, AS AMENDED (Act 451). FAILURE TO COMPLY WITH THE PROVISIONS OF THIS ACT MAY RESULT IN A MISDEMEANOR AND/OR CIVIL PENALTIES NOT TO EXCEED $5000 PER DAY, PER TANK.

INSTRUCTIONS: This form applies to releases of petroleum and hazardous substances from underground storage tanks regulated under Part 211, Underground Storage Tanks, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (PA 451).

The owner or operator must report suspected and confirmed releases to the Waste And Hazardous Materials Division (WHMD) within 24 hours of discovery. The report may be made by a consultant on behalf of the owner/operator. Phone **1-800-MICHUST**, FAX this form to 517-335-2245, or submit the web form from the WHMD web site www.state.mi.us/std. All information on this form must be provided regardless of whether the release is reported by telephone, FAX, or web form. For further information see Page 2.

WHMD USE ONLY	
FACILITY NUMBER	ENTRY DATE
UPGRADE/CANCEL DATE	INCIDENT NUMBER
DATE REPORTED	TIME REPORTED ☐ AM ☐ PM
REPORTED BY: ☐ PHONE ☐ FAX ☐ VOICE MAIL ☐ E-MAIL ☐ REGULAR MAIL	
Signature	

PERSON REPORTING RELEASE	COMPANY (IF NOT OWNER/OPERATOR)	TELEPHONE NUMBER:
Doug Rommeck		(313 724-2006
TANK REMOVAL CONTRACTOR	CONTRACTOR CONTACT	CONTRACTOR TELEPHONE NUMBER: ( )

I. OWNERSHIP OF TANKS			II. LOCATION OF TANKS			
NAME OF OWNER (CORPORATION, INDIVIDUAL, ETC.)			FACILITY NAME OR COMPANY SITE IDENTIFIER			
EaglePicher Automotive-Wolverine Gasket			Wolverine Gasket-Inkster			
STREET ADDRESS			STREET ADDRESS (P O Box Not Acceptable)			
2638 Princess St.			2638 Princess St.			
CITY	STATE	ZIP CODE	CITY	COUNTY	STATE	ZIP CODE
Inkster	MI	48141	Inkster	Wayne	MI	48141
TELEPHONE NUMBER			TELEPHONE NUMBER			
(313) 724-2006			(313) 724-2006			
DATE RELEASE DISCOVERED: 1/6/05			CONTACT PERSON FOR LOCATION			
TIME RELEASE DISCOVERED: ☐ AM ☒ PM			Doug Rommeck			

TANK NUMBER[1] (if known)	unknown				
SIZE OF TANK (gallons)	unknown				
SUBSTANCE RELEASED	unkown				
CAUSE OF RELEASE (Check all that apply)	☒ Tank ☐ Piping ☐ Spill Protection ☐ Overfill Protection ☐ Dispenser ☐ Unknown ☐ Other (provide details in comments)	☐ Tank ☐ Piping ☐ Spill Protection ☐ Overfill Protection ☐ Dispenser ☐ Unknown ☐ Other (provide details in comments)	☐ Tank ☐ Piping ☐ Spill Protection ☐ Overfill Protection ☐ Dispenser ☐ Unknown ☐ Other (provide details in comments)	☐ Tank ☐ Piping ☐ Spill Protection ☐ Overfill Protection ☐ Dispenser ☐ Unknown ☐ Other (provide details in comments)	☐ Tank ☐ Piping ☐ Spill Protection ☐ Overfill Protection ☐ Dispenser ☐ Unknown ☐ Other (provide details in comments)
HOW WAS LEAK DETECTED (Check all that apply)	☐ Tank Removal ☐ Inventory Records ☐ Repairs ☐ Stained Soil ☐ Petroleum Odors ☒ Analytical Data ☐ Free Product and/or Oil Sheen in Groundwater	☐ Tank Removal ☐ Inventory Records ☐ Repairs ☐ Stained Soil ☐ Petroleum Odors ☐ Analytical Data ☐ Free Product and/or Oil Sheen in Groundwater	☐ Tank Removal ☐ Inventory Records ☐ Repairs ☐ Stained Soil ☐ Petroleum Odors ☐ Analytical Data ☐ Free Product and/or Oil Sheen in Groundwater	☐ Tank Removal ☐ Inventory Records ☐ Repairs ☐ Stained Soil ☐ Petroleum Odors ☐ Analytical Data ☐ Free Product and/or Oil Sheen in Groundwater	☐ Tank Removal ☐ Inventory Records ☐ Repairs ☐ Stained Soil ☐ Petroleum Odors ☐ Analytical Data ☐ Free Product and/or Oil Sheen in Groundwater

COMMENTS (attach additional sheets if necessary):

Site is under active remediation, listed 201 site.

DISTRIBUTION: WHMD, FACILITY FILE, DISTRICT OFFICE, OWNER

[1] **Copy this page for additional tanks if needed.**

MI0012970

FACSIMILE TRANSMISSION

EaglePicher Automotive
INKSTER, MICHIGAN
FAX: 313/562-8248

TO: MI DEQ

Date: Friday, January 14, 2005

ATTN: **Jim Lucas**
Fax: 517/335-2245
FROM: Douglas Rommeck

Number of pages including cover: 2

SUBJECT: UST Release Report

The fax notification is follow-up to the voicemail message that I left on 1/7/2005 at 9:50 AM.

The call was placed to 517/335-2690 and was left on your voicemail. Please call with any questions.

Sincerely,

Douglas Rommeck
Manager-Health, Safety and Environment
EaglePicher Automotive
(313) 724-2006
(313) 278-3546 fax
(517) 610-1136 mobile

Transaction Report

Send
Transaction(s) completed

No.	TX Date/Time	Destination	Duration	P.#	Result	Mode
206	JAN-14 12:28	517 335 2245	0°00'16"	002	OK	N ECM

FACSIMILE TRANSMISSION

EaglePicher Automotive
INKSTER, MICHIGAN
FAX: 313/562-8248

TO: MI DEQ

Date: Friday, January 14, 2005

ATTN: **Jim Lucas**
Fax: 517/335-2245
FROM: Douglas Rommeck

Number of pages including cover: 2

SUBJECT: UST Release Report

The fax notification is follow-up to the voicemail message that I left on 1/7/2005 at 9:50 AM.

The call was placed to 517/335-2690 and was left on your voicemail. Please call with any questions.

Sincerely,

Douglas Rommeck
Manager-Health, Safety and Environment
EaglePicher Automotive
(313) 724-2006
(313) 278-3546 fax
(517) 610-1136 mobile

MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
WASTE AND HAZARDOUS MATERIALS DIVISION

Telephone : (517) 373-6247
Facsimile : (517) 335-2245

UNDERGROUND STORAGE TANKS ANNUAL REGISTRATION INVOICE

Under Authority of the Natural Resource and Environmental Protection Act,1994 PA 451 (NREPA), as amended, submission of false information and/or failure to pay the required Annual Underground Storage Tank Fee may result in a misdemeanor and/or civil penalties.

Fiscal Year: 2006 NOV - 9 2005 Invoice Date: November 7, 2005

Owner Address:	Location Address:
EaglePicher Automotive-Wolverine Gasket 2638 Princess St Inkster, MI 48141	EaglePicher Automotive Wolverine Gasket Division 2638 Princess St Inkster, MI 48141

Pursuant to Section 21102(8), Part 211 of NREPA, the owner of an underground storage tank system shall, upon registration or renewal of registration, pay a registration fee for each underground tank. Section 21102(10) requires that the owner of an underground storage tank system shall continue to pay registration fees on underground storage tanks that have been closed or removed until notification of the closure or removal is provided on the required form EQP-3821.
The period of registration is from 1/1/2006 to 12/31/2006; tank(s) must be closed or removed before 1/1/2006 and notification of the closure or removal must be received by 01/31/2006. Please indicate facility number on payments.

Facility Number	Tank Number	Tank Size	Contents	Registration Fee
00041772	1		Unknown	$100.00

Registration Fee:	$100.00
Previous Balance:	$0.00
Adjustments:	$0.00
Penalty Assessment:	$0.00
Amount Received:	$0.00
Balance Due:	$100.00

Payment Due On Or Before : January 10, 2006

See reverse side for FINANCIAL RESPONSIBILITY requirements.

Facility Number: 00041772
Total Due: $100.00

For Cashier's Use Only:

Owner Please Note :

Make check or money order payable to "**State Of Michigan**".
Please indicate **FACILITY NUMBER** on check or money order and send this with payment to:

CASHIER'S OFFICE
MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
P O BOX 30657
LANSING, MI 48909-8157

EQP 3803 (Rev. 10/02)

MI0012973

Important

Proof of Financial Responsibility (FR) Required

The Michigan Department of Environmental Quality, Waste and Hazardous Materials Division, is requiring that you submit your proof of FR along with your annual registration fee. **If documentation of FR has been provided in the past, you are still required to submit proof of FR** along with your annual registration fee that you received with this mailing.

If your FR is by insurance or a risk retention group, your proof of **FR must be in the form of a certificate of insurance supplied and signed by your insurance carrier. Be sure the certificate includes the address of the facility and number of tanks covered by the policy.** Please do not supply the entire insurance policy, just the certificate of insurance.

Failure to provide proof of FR may result in enforcement action.

Pursuant to Rule 61, Section 280.90 of the Michigan Underground Storage Tank Rules, 1999 AACS, R29.2161 et seq., owners/operators of petroleum underground storage tanks (USTs) are required to provide proof of Financial Responsibility for taking corrective action and for compensating third parties for bodily injury and property damage arising from a release by petroleum USTs.

If you have questions regarding FR, please contact Mr. Kevin Wieber at 517-335-7260 or by e-mail at WIEBERK@MICHIGAN.GOV.

Web Sites

MDEQ web site www.michigan.gov/deq
Waste and Hazardous Materials Division web site www.michigan.gov/deqwhmd
Download forms and informational memoranda from web site www.deq.state.mi.us/docucenter

Contact person for Storage Tank program in following areas:

Financial Responsibility – Kevin Wieber (517) 335-7260
Billing – Ron Horvath (517) 373-6247
Registrations – Stella Konadu (517) 335-7210

MDEQ Address

Michigan Department of Environmental Quality
Waste and Hazardous Materials Division – Storage Tank Unit
Constitution Hall, Atrium Level
525 West Allegan Street
Lansing, MI 48913
Phone # (517) 335-2690

DEQ

MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY – WASTE AND HAZARDOUS MATERIALS DIVISION
PO BOX 30157, LANSING, MI 48909-7657

REGISTRATION OF UNDERGROUND STORAGE TANKS

The information in this form is required under "Part 211, Underground Storage Tank Regulations, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended." Any owner who knowingly fails to notify or submits false information shall be subject to a misdemeanor and/or civil penalties not to exceed $5,000 per day for each

NEW REGISTRATION
X AMENDED INFORMATION (for Registered USTs Only)

FACILITY IDENTIFICATION NUMBER (if known): 00041772

NO. OF TANKS AT FACILITY 01 | NO. OF CONTINUATION SHEETS ATTACHED 0

I. OWNERSHIP OF TANKS

IF THIS IS A NEW OWNER'S ADDRESS, PLEASE CHECK ☐

OWNER NAME (Corporation/Individual, etc.): EaglePicher Automotive-Wolverine Gasket Division

MAILING ADDRESS: 2638 Princess St.

CITY: Inkster | STATE: MI | ZIP: 48141

COUNTRY (Please Specify): X USA ☐ OTHER _____

TELEPHONE (Including Area Code): (313) 562 – 5427

II. LOCATION OF TANKS

IF INFORMATION IS THE SAME AS SECTION I, PLEASE CHECK X

FACILITY NAME OR SITE IDENTIFIER:

STREET ADDRESS (P.O. Box Not Acceptable):

CITY: | STATE: Michigan | ZIP:

COUNTY:

TELEPHONE (Including Area Code): ( ) –

TAX PAYER ID OR SOCIAL SECURITY NUMBER: 31-0268670

LATITUDE AND LONGITUDE of facility (If known)
LATITUDE (North): 42 17' 33" LONGITUDE (West): -83 18' 09"

III. TYPE OF OWNER

☐ FEDERAL ☐ COMMERCIAL
☐ STATE GOVERNMENT X PRIVATE
☐ LOCAL GOVERNMENT ARE TANKS LOCATED ON LAND WITHIN A RESERVATION? ☐ YES XNO

IF TANKS ARE LOCATED WITHIN A RESERVATION, DOES A NATIVE AMERICAN TRIBE OWN TANKS? ☐ YES ☐ NO

IF TANKS ARE OWNED BY A TRIBE, NAME OF TRIBE: _____

IV. TYPE OF FACILITY

☐ PUBLIC GAS STATION	☐ LOCAL GOVERNMENT	☐ CONTRACTOR
☐ PRIVATE GAS STATION	☐ STATE GOVERNMENT	☐ TRUCKING/TRANSPORT
☐ MARINE GAS STATION	☐ FEDERAL/NON-MILITARY	☐ UTILITIES
☐ PETROLEUM DISTRIBUTOR	☐ FEDERAL-MILITARY	☐ RESIDENTIAL
☐ AIRLINE AND/OR AIRCRAFT OWNER	☐ COMMERCIAL	☐ FARM
☐ AUTO DEALERSHIP	X INDUSTRIAL	☐ OTHER (Explain)_____
☐ RAILROAD	☐ HOSPITAL	

V. CONTACT PERSON

NAME	JOB TITLE	TELEPHONE (Including Area Code)
Douglas Rommeck	HSE Manager	(313) 724 – 2006

VI. FINANCIAL RESPONSIBILITY

I HAVE MET THE FINANCIAL RESPONSIBILITY REQUIREMENTS AS REQUIRED IN THE MICHIGAN UNDERGROUND STORAGE TANK RULES (MUSTR) (Check All Items Below That Apply)

☐ SELF INSURANCE	☐ GUARANTEE	☐ TRUST FUND
☐ COMMERCIAL INSURANCE	☐ SURETY BOND	
☐ RISK RETENTION GROUP	☐ LETTER OF CREDIT	

VII. CERTIFICATION

I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED IN THIS FORM AND ALL ATTACHED DOCUMENTS AND THAT I HAVE VERIFIED THAT THE INFORMATION IS TRUE, ACCURATE, AND COMPLETE.

NAME AND OFFICIAL TITLE OF OWNER OR OWNERS' AUTHORIZED REPRESENTATIVE	SIGNATURE	DATE
Douglas Rommeck, HSE Manager	Doug Rommeck	11/10/05

EQP3821 (REV 11/02)

MI0012975

VIII. DESCRIPTION OF UNDERGROUND STORAGE TANKS

(Complete the following pages for each tank at this location; Copy these pages for additional tanks if needed)

TANK IDENTIFICATION NUMBER								
7. STATUS OF TANKS (Check One)								
CURRENTLY IN USE	☐	☐	☐	☐	☐	☐	☐	☐
TEMPORARILY OUT OF USE	☐	☐	☐	☐	☐	☐	☐	☐
AMENDMENT OF INFORMATION	☐	☐	☐	☐	☐	☐	☐	☐
(If tanks are removed/closed, complete page 3, Section IX)								
2. DATE OF INSTALLATION (Month/Day/Year)								
3. ESTIMATED TOTAL CAPACITY (Gallons)								
4. MATERIAL OF CONSTRUCTION (Mark All That Apply)								
ASPHALT COATED OR BARE STEEL	☐	☐	☐	☐	☐	☐	☐	☐
CATHODICALLY PROTECTED STEEL	☐	☐	☐	☐	☐	☐	☐	☐
EPOXY COATED STEEL	☐	☐	☐	☐	☐	☐	☐	☐
COMPOSITE (Steel With Fiberglass)	☐	☐	☐	☐	☐	☐	☐	☐
FIBERGLASS REINFORCED PLASTIC	☐	☐	☐	☐	☐	☐	☐	☐
LINED INTERIOR	☐	☐	☐	☐	☐	☐	☐	☐
DOUBLE WALLED	☐	☐	☐	☐	☐	☐	☐	☐
POLYETHYLENE TANK JACKET	☐	☐	☐	☐	☐	☐	☐	☐
CONCRETE	☐	☐	☐	☐	☐	☐	☐	☐
EXCAVATION LINER	☐	☐	☐	☐	☐	☐	☐	☐
UNKNOWN	☐	☐	☐	☐	☐	☐	☐	☐
OTHER (Specify in comments area)	☐	☐	☐	☐	☐	☐	☐	☐
HAS TANK BEEN REPAIRED?	☐	☐	☐	☐	☐	☐	☐	☐
5. PIPING MATERIAL (Mark All That Apply)								
BARE STEEL	☐	☐	☐	☐	☐	☐	☐	☐
GALVANIZED STEEL	☐	☐	☐	☐	☐	☐	☐	☐
FIBERGLASS REINFORCED PLASTIC	☐	☐	☐	☐	☐	☐	☐	☐
COPPER	☐	☐	☐	☐	☐	☐	☐	☐
CATHODICALLY PROTECTED	☐	☐	☐	☐	☐	☐	☐	☐
DOUBLE WALLED	☐	☐	☐	☐	☐	☐	☐	☐
FLEXIBLE PIPING	☐	☐	☐	☐	☐	☐	☐	☐
ENVIROFLEX	☐	☐	☐	☐	☐	☐	☐	☐
GEOFLEX	☐	☐	☐	☐	☐	☐	☐	☐
UNKNOWN	☐	☐	☐	☐	☐	☐	☐	☐
6. PIPING (Type) (Mark All That Apply)								
SUCTION: NO VALVE AT TANK	☐	☐	☐	☐	☐	☐	☐	☐
SUCTION: VALVE AT TANK	☐	☐	☐	☐	☐	☐	☐	☐
PRESSURE (Remote)	☐	☐	☐	☐	☐	☐	☐	☐
HAS PIPING BEEN REPAIRED?	☐	☐	☐	☐	☐	☐	☐	☐

TANK IDENTIFICATION NUMBER								
7. SUBSTANCE CURRENTLY OR LAST STORED IN GREATEST QUANTITY BY VOLUME								
GASOLINE	☐	☐	☐	☐	☐	☐	☐	☐
DIESEL	☐	☐	☐	☐	☐	☐	☐	☐
GASOHOL	☐	☐	☐	☐	☐	☐	☐	☐
KEROSENE	☐	☐	☐	☐	☐	☐	☐	☐
(Not For Consumptive Use On Premises) FUEL OIL	☐	☐	☐	☐	☐	☐	☐	☐
MOTOR OIL	☐	☐	☐	☐	☐	☐	☐	☐
USED OIL	☐	☐	☐	☐	☐	☐	☐	☐
HAZARDOUS SUBSTANCE	☐	☐	☐	☐	☐	☐	☐	☐
TANK HAS COMPARTMENTS (List substances in comments area)	☐	☐	☐	☐	☐	☐	☐	☐
OTHER (Specify in comments area)	☐	☐	☐	☐	☐	☐	☐	☐
CERCLA NAME AND/OR CHEMICAL ABSTRACT SERVICE (CAS) NUMBER (if hazardous substance stored)	☐	☐	☐	☐	☐	☐	☐	☐
	_____	_____	_____	_____	_____	_____	_____	_____

IX. TANKS OUT OF USE OR CHANGE IN SERVICE

NOTE: A SITE ASSESSMENT MUST BE COMPLETED UNLESS YOU REPORT A CONFIRMED RELEASE

1. CLOSING OF TANK A. ESTIMATED DATE LAST USED (Month/Day/Year)								
B. ESTIMATED DATE TANK REMOVED/ CLOSED IN PLACE (Month/Day/Year)	11/13/05							
C. TANK WAS REMOVED FROM GROUND	☐	☐	☐	☐	☐	☐	☐	☐
D. TANK FILLED WITH INERT MATERIAL (Sand, Concrete, etc.)	X	☐	☐	☐	☐	☐	☐	☐
•DESCRIBE TYPE OF FILL USED	_Concrete_	_____	_____	_____	_____	_____	_____	_____
•REASON TANK WAS NOT REMOVED	_____	_____	_____	_____	_____	_____	_____	_____
E. CHANGE IN SERVICE	☐	☐	☐	☐	☐	☐	☐	☐

X. CERTIFICATION OF COMPLIANCE

1. INSTALLATION A. INSTALLER CERTIFIED BY TANK AND PIPING MANUFACTURERS	☐	☐	☐	☐	☐	☐	☐	☐
B. INSTALLER CERTIFIED OR LICENSED BY STU	☐	☐	☐	☐	☐	☐	☐	☐
C. INSTALLATION INSPECTED BY A REGISTERED ENGINEER	☐	☐	☐	☐	☐	☐	☐	☐
D. INSTALLATION INSPECTED AND APPROVED BY STU	☐	☐	☐	☐	☐	☐	☐	☐
E. ANOTHER METHOD ALLOWED BY STU (Please Specify)	_____	_____	_____	_____	_____	_____	_____	_____

TANK IDENTIFICATION NUMBER																
2. RELEASE DETECTION	TAN	PIPE	TAN	PIPE	TAN	PIPE	TAN	PIPE	TAN	PIPE	TAN	PIPE	TAN	PIPE	TAN	PIPE
A. MANUAL (Static) TANK GAUGING	☐		☐		☐		☐		☐		☐		☐		☐	
B. TANK TIGHTNESS TESTING	☐		☐		☐		☐		☐		☐		☐		☐	
C. INVENTORY CONTROL	☐		☐		☐		☐		☐		☐		☐		☐	
D. AUTOMATIC TANK GAUGING	☐		☐		☐		☐		☐		☐		☐		☐	
E. VAPOR MONITORING	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐
F. GROUNDWATER MONITORING	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐
G. INTERSTITIAL MONITORING DOUBLE WALLED TANK/PIPING	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐
H. AUTOMATIC LINE LEAK DETECTORS		☐		☐		☐		☐		☐		☐		☐		☐
I. LINE TIGHTNESS TESTING		☐		☐		☐		☐		☐		☐		☐		☐
K. OTHER METHOD ALLOWED BY STU (Specify in comments area)	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐
3. SPILL AND OVERFILL PROTECTION																
A. OVERFILL DEVICE INSTALLED	☐		☐		☐		☐		☐		☐		☐		☐	
B. SPILL DEVICE INSTALLED	☐		☐		☐		☐		☐		☐		☐		☐	
4. HAVE YOU INSTALLED IMPRESSED CURRENT CATHODIC PROTECTION?																
A. YES	☐		☐		☐		☐		☐		☐		☐		☐	
B. NO	☐		☐		☐		☐		☐		☐		☐		☐	

I CERTIFY THE INFORMATION CONCERNING INSTALLATION THAT IS PROVIDED IN SECTION X IS TRUE TO THE BEST OF MY BELIEF AND KNOWLEDGE.

INSTALLER:

NAME PRINTED _____ SIGNATURE _____ DATE _____

TITLE _____ COMPANY _____

COMMENTS AND/OR CLARIFICATIONS FOR THE ST STAFF:

Please review Facility Inspect Report Attached, 9/13/05 C. Blackford MI DEQ

DEQ

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
WASTE AND HAZARDOUS MATERIALS DIVISION

SEP 16 2005

FACILITY INSPECTION REPORT

Owner Name & Address:

EaglePicher Automotive-Wolverine Gasket
2638 Princess St
Inkster, MI 48141

Location of Tanks:

EaglePicher Automotive Wolverine Gasket Division
2638 Princess St
Inkster, MI 48141
County - Wayne
Facility ID - 00041772

ATTENTION: Doug Rommeck

A Closure Inspection was conducted on September 13, 2005, at the above-subject facility for compliance with Part 211, Underground Storage Tank Regulations, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451), the Michigan Underground Storage Tank Rules (MUSTR), 1999 AACS R 29.2101 et seq. and the applicable sections of the rules for the Storage and Handling of Flammable and Combustible Liquids, 2003 AACS R 29.5101 et seq. The inspection showed that there was no action taken by the inspector.

The Inspector was on site to witness the closure of a 2000 gallon UST located under the building. The tank was cleaned out and filled with a flowable mix concrete. A site assessment shall be conducted and the registration shall be ammended to avoid future registration fees.

If you have additional questions concerning this matter, please contact me.

9/13/05

Date

Clifford Blackford
Hazardous Materials Storage Inspector
SE Michigan District Office
27700 Donald Court
Warren, MI 48092-2793
Phone: (586) 753-3836
Fax: (586) 753-3831

DEQ

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
WASTE AND HAZARDOUS MATERIALS DIVISION

AUG 11 2005

FACILITY INSPECTION REPORT

Owner Name & Address:

EaglePicher Automotive-Wolverine Gasket
2638 Princess St
Inkster, MI 48141

Location of Tanks:

EaglePicher Automotive Wolverine Gasket Division
2638 Princess St
Inkster, MI 48141
County - Wayne
Facility ID - 00041772

ATTENTION: Doug Rommeck

A Site Investigation was conducted on August 8, 2005, at the above-subject facility for compliance with Part 211, Underground Storage Tank Regulations, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451), the Michigan Underground Storage Tank Rules (MUSTR), 1999 AACS R 29.2101 et seq. and the applicable sections of the rules for the Storage and Handling of Flammable and Combustible Liquids, 2003 AACS R 29.5101 et seq. The inspection showed that there was no action taken by the inspector.

The Inspector was on site to determine the need to close an unknown UST in place. The tank is found to be under the foundation of the building and is permitted to be closed in place. An Intent of Removal/Closure was filled out and shall be forwarded to Lansing. A 30 day waiver notice will be granted upon notice to the Inspector. The tank shall be filled with an inert material.

If you have additional questions concerning this matter, please contact me.

8/9/2005
Date

Clifford Blackford
Hazardous Materials Storage Inspector
SE Michigan District Office
27700 Donald Court
Warren, MI 48092-2793
Phone: (586) 753-3836
Fax: (586) 753-3831

Facility Number 00041772 **Expiration Date** February 13, 2006

MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
WASTE AND HAZARDOUS MATERIALS DIVISION

UNDERGROUND STORAGE TANK REGISTRATION CERTIFICATE

Issued by Department of Environmental Quality under authority of Natural Resources & Environmental Protection Act, 1994, PA 451, as amended.

Location Address:

EaglePicher Automotive Wolverine Gasket Division
2638 Princess St
Inkster, MI 48141

Owner Address:

EaglePicher Automotive-Wolverine Gasket
2638 Princess St
Inkster, MI 48141

The period of registration is from 01/01/2005 to 12/31/2005. The Certificate Expiration Date is to allow time for the WHMD to process payments and does not reflect the date of valid registration. The certificate is invalid, at any time fees are not paid in full.

Sec. 21102(9) requires that this Registration Certificate be displayed at the facility location referenced above.

The Following tanks have been duly registered at this facility:

Tank Number	Description	Substance Stored
1		Unknown

CONESTOGA-ROVERS
& ASSOCIATES

2055 Niagara Falls Blvd, Suite #3, Niagara Falls, NY 14304
Telephone: 716·297·6150 Facsimile: 716·297·2265
www.CRAworld.com

NOV - 7 2005

EaglePicher Automotive
Wolverine Gasket Division
2638 Princess Street
Inkster, MI. 48141

Invoice #: 76834
Project: 042354
Project Name: UST Closure Oversight
Invoice Group: 03
Invoice Date: 10/27/2005
Purchase Order:

Attention: Doug Rommeck

PO# 000324

TERMS: Net 30 Days. Service Charge of 1½% per month payable on overdue accounts.

For Professional Services Rendered through: 9/30/2005

Total Project Fee Authorized	750.00
Percent Complete as of 10/2/2005	100.00
Fee Earned To Date	750.00
Less Previous Billings	0.00
Current Billing Amount	750.00
Amount Due this Invoice	**750.00**

12/21 emailed Doug

Tom Kinney

12/20 Doug Rommeck

REMITTANCE ADDRESS
Conestoga-Rovers & Associates, Inc.
Department 406
P.O. Box 8000
Buffalo, NY 14267

EQUAL EMPLOYMENT OPPORTUNITY EMPLOYER

11/24
2195 01 00

NOT IN PLEXUS
04-104

Equal Employment Opportunity Employer

REGISTERED COMPANY FOR ISO 9001 ENGINEERING DESIGN

Worldwide Engineering, Environmental, Construction, and IT Services

MI0012983

CONESTOGA-ROVERS
& ASSOCIATES

2055 Niagara Falls Blvd, Suite #3, Niagara Falls, NY 14304
Telephone: 716-297-6150 Facsimile: 716-297-2265
www.CRAworld.com

NOV 10 2005

EaglePicher Automotive
Wolverine Gasket Division
2638 Princess Street
Inkster, MI. 48141

Invoice #: 76847
Project: 042354
Project Name: UST Field Investigation
Invoice Group: 02
Invoice Date: 10/27/2005
Purchase Order:

Attention: Doug Rommeck

TERMS: Net 30 Days. Service Charge of 1½% per month payable on overdue accounts.

For Professional Services Rendered through: 9/30/2005

Total Project Fee Authorized	3,000.00
Percent Complete as of 10/2/2005	100.00
Fee Earned To Date	3,000.00
Less Previous Billings	0.00
Current Billing Amount	3,000.00
Amount Due this Invoice	**3,000.00**

Tom Kinney

REMITTANCE ADDRESS
Conestoga-Rovers & Associates, Inc.
Department 406
P.O. Box 8000
Buffalo, NY 14267

EQUAL EMPLOYMENT OPPORTUNITY EMPLOYER

CONESTOGA-ROVERS
& ASSOCIATES

14496 Sheldon Road, Suite #200, Plymouth, MI 48170
Telephone: 734-453-5123 Facsimile: 734-453-5201
www.CRAworld.com

March 24, 2005 Reference No. 35298

Mr. Doug Rommeck
EaglePicher Automotive
2424 John Daly Road
Inkster, Michigan 48141

Dear Mr. Rommeck:

Re: UST Closure and Related Recommendations for Water Removal
EaglePicher Automotive
Wolverine Gasket Division
2638 Princess Street
Inkster, Michigan

Conestoga-Rovers & Associates, Inc. (CRA) recommends additional groundwater be removed from the Site while the Vac-Truck is on-Site to remove water from the UST as part of the UST closure activities. A sheen has been observed in some wells during previous on-Site activities. Removal of this water may increase the overall effectiveness of the groundwater treatment program. This assumes that the water can be removed from the well without any damage to the well. Any damage that is done to these wells will reduce the effectiveness of future groundwater treatments. The attached draft figure indicates the wells and injection points that are recommended for water removal.

CRA also recommends that groundwater from the nutrient injection system (injection trench) be removed. The water within the vicinity of the injection trench has historically shown relatively high levels of VOC impact. The removal of this water may also assist in the overall effectiveness of the groundwater treatment program.

CRA is willing to send out a field technician to mark the wells that we are recommending for water removal. The wells can be flagged with a ribbon that will distinguish them from the other wells. Alternatively, a field technician can be present during on-Site activities to guide the water removal process and assure that the wells are not damaged.

Yours truly,

CONESTOGA-ROVERS & ASSOCIATES

Thomas Kinney

Thomas M. Kinney, C.P.G.

TK/bw/4/Det.

EQUAL EMPLOYMENT OPPORTUNITY EMPLOYER

REGISTERED COMPANY
ISO 9001
ENGINEERING DESIGN

Worldwide Engineering, Environmental, Construction, and IT Services

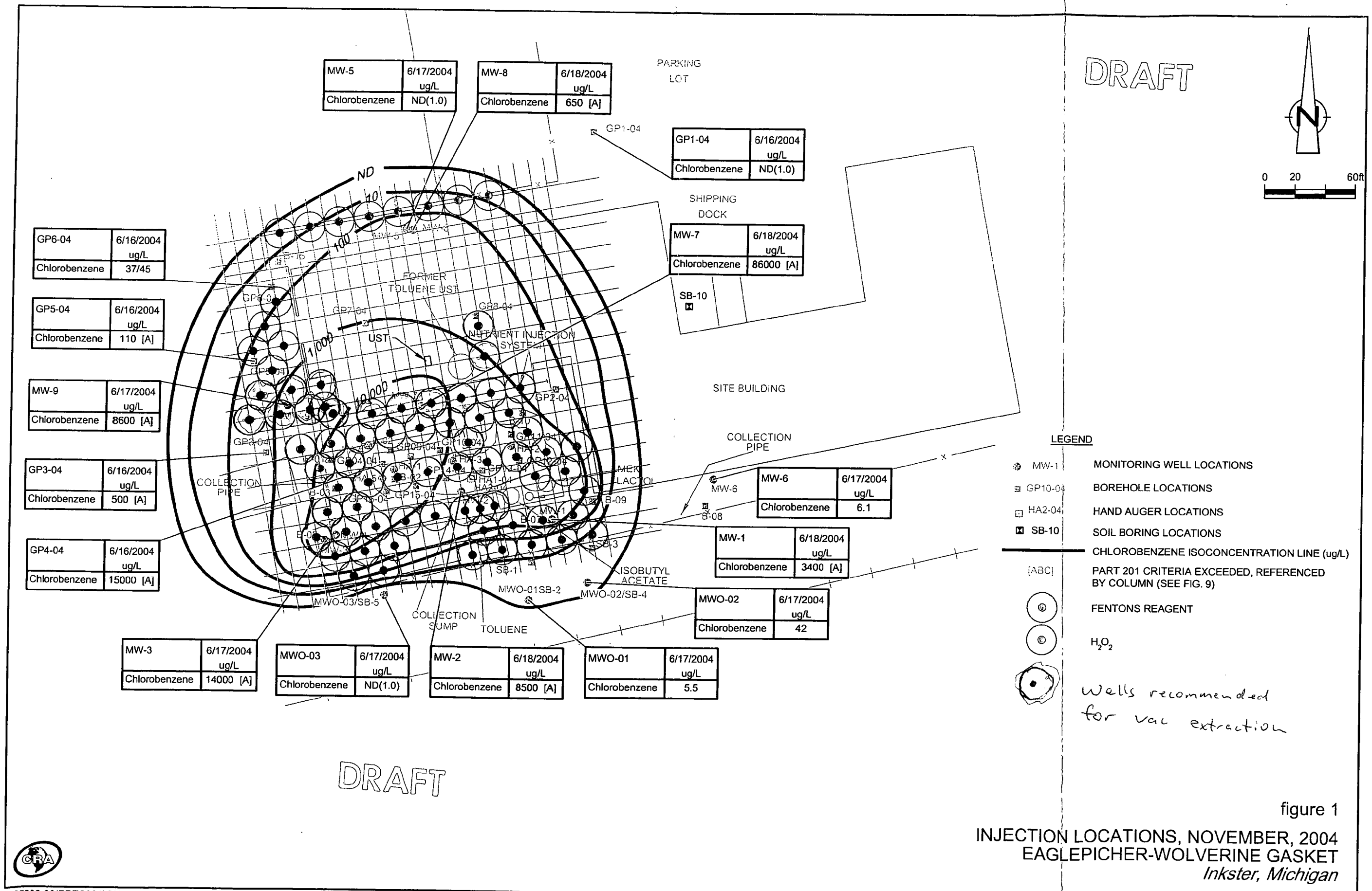


figure 1

INJECTION LOCATIONS, NOVEMBER, 2004
EAGLEPICHER-WOLVERINE GASKET
Inkster, Michigan

35298-00(PRES001)GN-DE006 MAR 07/2005

MI00012986

WOLVERINE GASKET DIVISION
2638 PRINCESS STREET
INKSTER, MICHIGAN 48141
PHONE (313) 562-6400 FAX (313) 562-5427

SEND ALL INVOICES TO

PURCHASE ORDER REQUISITION / RELEASE

SHIP TO

- [X] INKSTER DIVISION, 2638 PRINCESS ST., INKSTER, MI 48141, (313) 562-6400
- [ ] BLACKSBURG DIVISION, 201 INDUSTRIAL PARK RD. S.E., BLACKSBURG, VA 24060, (540) 552-6082
- [ ] LEESBURG DIVISION, 10825 C.R. 44, LEESBURG, FL 34788, (352) 787-3015
- [ ] CEDAR RUN DIVISION, 3175 STATE STREET, BLACKSBURG, VA 24060, (540) 953-1742

SUPPLIER	EMA	SUPPLIER#	P.O. NO.
ADDRESS	10627 Midwest	TELEPHONE	RELEASE NO.
CITY	St. Louis	STATE MO ZIP 63132	DATE 10/17/05
FOR DEPT	TO BE USED FOR Inkster UST Removal		CONFIRMED DATE 9/26/05
DEL. REQ.	F.O.B. POINT	TERMS	CONFIRMED TO

QTY.	DESCRIPTION	DEPT.	ACCOUNT CODE	PRICE	U/M
	Open, Clean, Fill in-place				
	2000 gal UST at				
	Wolverine Inkster location				
	Total			8,300.00	Lt

SIGNED	APPROVED (DEPT. HEAD)	AUTHORIZED (PURCHASING)

FORM 4MM06126 REV: B

SUPPLIER

MI0012987

ENVIRONMENTAL MANAGEMENT ALTERNATIVES

10627 Midwest Industrial Blvd
St. Louis, MO 63132
www.ema-env.com

Invoice

Date	Invoice #
9/26/2005	99092-wgim

Bill To	Ship To/Site Location
WOLVERINE GASKET Accounts Payable 2638 PRINCESS STREET INKSTER, MI 48141	Inkster Site

P.O. No.	Manifest No.	Terms	Rep	Ship Date	Ship Via	FOB
	4833300	Net 30	DJG	9/13/2005	Tanker Tr...	

Description	Qty	Rate	Amount
On-Site Cleaning and In-Place Closure of Underground Storage Tank	1	8,300.00	8,300.00

			Total	$8,300.00
Phone#	Fax#	E-Mail	**Payments/Credits**	$0.00
314-785-6425	314-785-6426	mtumbarello@ema-env.com	**Balance Due**	**$8,300.00**

Please make checks payable to Environmental Management Alternatives, Inc.
If you have any questions regarding this invoice, please contact Maria Tumbarello.

We now accept Mastercard, Visa and American Express.

Wolverine Gasket
Inkster, Michigan

In place closure of UST

LABOR

		STRAIGHT TIME			OVERTIME			TOTAL
OCCUPATION	**QUANTITY**	**HOURS**	**RATE**	**AMOUNT**	**HOURS**	**RATE**	**AMOUNT**	**AMOUNT**
Foreman	1	30.0	65.00	$1,950.00	0.0	97.50		$ 1,950.00
Laborer	1	30.0	45.00	$1,350.00	0.0	67.50		$ 1,350.00
								$ -
								$ -
							"A" TOTAL	$ 3,300.00

EQUIPMENT

EQUIP. NO.	DESCRIPTION	QTY	NUMBER OF UNITS	UNIT	COST/ UNIT	SUBTOTAL COSTS	TOTAL AMOUNT
1	Service Vehicle	1	3	day	75.00	75.00	$ 225.00
2	Per Diem	2	2	day	50.00	100.00	$ 200.00
3	Sawsall	1	1	day	125.00	125.00	$ -
4	Miscellaneous Hand Tools	1	1	day	50.00	50.00	$ -
						-	$ -
						"B" TOTAL	$ 425.00

OTHER COSTS

	QTY	UNIT	COST/ UNIT	COSTS		TOTAL AMOUNT
Hourly Rate for Vacuum Truck	1	8	hourly	115.00		$ 920.00
Disposal of Class 9 Liquid to EQ	3500	1	gallons	0.90		$ 3,150.00
Flowable Concrete	20	1	cubic yards	95.00		$ 1,900.00
					"C" TOTAL	$ 5,970.00

"A" TOTAL	$ 3,300.00
"B" TOTAL	$ 425.00
"C" TOTAL	$ 5,970.00
GRAND TOTAL	$ 9,695.00

wg inkster in place11
2/4/2005

CONESTOGA-ROVERS
& ASSOCIATES

14496 Sheldon Road, Suite #200, Plymouth, MI 48170
Telephone: 734-453-5123 Facsimile: 734-453-5201
www.CRAworld.com

June 17, 2005

Reference No. 35298

Mr. Doug Rommeck
EaglePicher Automotive
2424 John Daly Road
Inkster, Michigan 48141

Dear Mr. Rommeck:

Re: Proposal for Professional Services
Underground Storage Tank Closure
EaglePicher Automotive
Wolverine Gasket Division
2638 Princess Street
Inkster, Michigan

Conestoga-Rovers & Associates, Inc. (CRA) is providing this Proposal for Professional Services (Proposal) associated with an underground storage tank (UST) closure for EaglePicher Automotive (EaglePicher) for the facility located at 2638 Princess Street in Inkster, Michigan (Site). This proposal describes the work needed to respond to the Michigan Department of Environmental Quality (MDEQ) letter to EaglePicher, dated May 4, 2005 and to obtain closure of the UST.

A UST was encountered on November 4, 2004 beneath the floor of the Wolverine Gasket building (see Figure 1). The UST was immediately west of the location where a former toluene UST had reportedly been removed in the early 1960's from beneath the building. The UST was encountered during drilling operations associated with the installation of injection wells. The injection wells were being installed to treat groundwater impacted by volatile organic compounds (VOCs), primarily benzene, toluene, ethylbenzene, xylenes (BTEX), and chlorobenzene. EaglePicher utilized a contractor to cut a hole in the UST and EaglePicher collected a water sample from inside the UST on December 28, 2004. Based on the laboratory results of the water sample, EaglePicher notified the MDEQ of a confirmed release on January 6, 2005. The results of the water sample indicate that chlorobenzene (62.757 ppm) and toluene (20.303 ppm) were present at high levels and benzene (2.379 ppm), ethylbenzene (3.539 ppm), and xylenes (5.993 ppm) were also present at elevated levels. These constituents are the same constituents that have been detected at the site previously. These concentrations, especially for toluene, are generally as high or higher than previously detected in groundwater at the Site.

The known contamination is present primarily in the areas south of the building and beneath the building. An underground pipeline going from the former Lactol aboveground storage tank (AST) to the building had a documented release. The reports on file state that the Lactol

consisted of a mixture of constituents, with toluene and xylenes being the primary constituents. CRA performed an on-line review of MSDSs that indicate toluene is typically present at between 10 and 18 percent of Lactol spirits. The underground Lactol piping was removed and free product was pumped out of the excavation. The release from this Lactol pipeline appears to have been the source of the soil and groundwater contamination south of the building.

Additionally, an UST that reportedly contained toluene was removed in the early 1960's from beneath the building and may have been an additional source of the site contamination. The source of the benzene contamination is unknown.

Based on nearby monitoring wells, the depth to perched groundwater in the vicinity of the UST varies from approximately 0.5 to 2.0 feet below ground surface (bgs). Groundwater is present in a shallow perched water-bearing zone that appears to flow to the north beneath the building. However, there is some localized perched groundwater flow to the south near the southern perimeter of the Site. Sandy soils are typically present within the upper 1.5 feet bgs near the southern end of the building and to 5.5 feet bgs near the southern property line. Clays and silty clays are present beneath this surficial perched water-bearing sand and appear to be greater than 20 feet thick.

EaglePicher requested to conduct the necessary corrective actions under Part 201 rather than Part 213, due to ongoing remediation under Part 201. The MDEQ requested additional information be provided before they will consider whether to handle the UST release under Part 201. Additionally, the MDEQ documented that the UST needs to be properly closed-in-place as required under Part 211. The scope of work described in this proposal identifies the work needed to respond to the MDEQ's letter and to properly close the UST.

This Proposal is presented in the following titled sections:

Section 1.0	Scope of Work
Section 20	Cost Estimate
Section 3.0	Schedule

1.0 SCOPE OF WORK

This Scope of Work (SOW) has been prepared based on a review of the May 4, 2005 letter from the MDEQ and conversations between EaglePicher and CRA. The SOW will consist of the following tasks:

Task 1	Respond to the MDEQ's letter;
Task 2	Complete field investigations to assess soil and groundwater adjacent to the UST;
Task 3	Close the UST in place;
Task 4	Prepare a report that summarizes field activities associated with the UST; and
Task 5	Prepare a report that summarizes the remedial activities that have been and will continue to be conducted under Part 201 to bring the Site to closure.

1.1 RESPOND TO THE MDEQ'S LETTER

CRA will prepare a letter summarizing EaglePicher's plan to obtain the requested information. The letter will provide a schedule documenting when the activities will take place and when the results will be provided to the MDEQ.

1.2 UST FIELD INVESTIGATIONS

Soil and groundwater samples will be collected from two locations immediately adjacent to the UST (depending on accessibility, one to the east and one to the west). The concrete will be cored and manual tools (hand auger) will be utilized to collect a soil sample from each boring and to set a 1-inch diameter well in each borehole. One unsaturated soil sample and one groundwater sample will be collected from each location. The soil and groundwater samples will be analyzed for TCL VOCs and semi-volatile organic compounds (SVOCs). One trip blank and one duplicate sample will be analyzed to provide quality control.

1.3 CLOSE UST

CRA will provide a technician to observe closure activities of the UST. Additionally, CRA can assist with MDEQ notifications associated with the UST closure. It is assumed that a CRA technician will spend one day (maximum of 8-hours) providing oversight and observations of the UST closure. This will include working with the vacuum truck operator to remove heavily

impacted groundwater (water with a sheen or detected high concentrations of VOCs) from select wells, as documented in our March 24, 2005 letter.

1.4 UST CLOSURE REPORTING

A report will be prepared for the MDEQ that documents the results of the UST field investigations and the UST closure activities. Additionally, the analytical results will be compared to the results from the ongoing remediation being conducted under Part 201.

1.5 PART 201 REMEDIAL ACTIVITIES SUMMARY

A report will be prepared for the MDEQ that summarizes remedial activities conducted at the Site. This will include the historical remedial activities, the soil removal activities, the pre-design field investigation activities conducted by CRA, the recent chemical oxidation and enhanced bioremediation activites, and associated performance-monitoring activities. Additionally, a plan of future remedial activities and associated performance monitoring activities will be provided. A schedule of the planned activities will be included. However, this summary will not be a formal Remedial Action Plan (RAP).

2.0 COST ESTIMATE

CRA will complete the activities described in Section 1 on a lump sum basis. The total lump sum charges for Tasks 1 through 5 is $11,750. The following summarizes the lump sum unit rates for each task:

Task 1 - Respond to the MDEQ's letter	$500
Task 2 – UST field investigation	$3,000
Task 3 – UST closure oversight	$750
Task 4 – UST field investigation summary report	$2,500
Task 5 – Part 201 Remedial Activities Summary	$5,000

The costs include any subcontractors necessary (concrete coring, laboratory analysis) to complete the proposed scope of work. EaglePicher will contract directly with a subcontractor to perform the UST cleaning, abandonment-in-place, removal of water, transportation and disposal of wastes.

3.0 SCHEDULE

CRA will commence the Services described above upon written acceptance of this Proposal. A letter can be prepared for the MDEQ immediately upon acceptance of this proposal. If EaglePicher requires a different schedule, CRA can adjust our schedule to meet your project goals.

We appreciate the opportunity to present this Proposal to EaglePicher. Please feel free to contact the undersigned at (734) 453-5123 should you require clarification or further information on any aspect of this Proposal.

Yours truly,

CONESTOGA-ROVERS & ASSOCIATES

Thomas Kinney

Thomas M. Kinney, C.P.G.

TK/3/PR/Det.

c.c.: Tom Johnson, CRA

WASTE AND HAZARDOUS MATERIALS DIVISION
MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY

DO NOT WRITE IN THIS SPACE
ATT. ☐ DIS. ☐ REJ. ☐ PR. ☐

Required under authority of Part 111 and Part 121 of Act 451, 1994, as amended.

Failure to file may subject you to criminal and/or civil penalties under Section 324.11151 or 324.12116 MCL.

Please print or type.

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. MID005354386
Manifest Document No. 83760
2. Page 1 of 1
Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
WOLVERINE GASKET & MFG.
2633 PRINCESS
INKSTER, MI 48141
4. Generator's Phone ( ) (313) 562-6400

A. State Manifest Document Number MI 10083760
B. State Generator's ID
C. State Transporter's ID
D. Transporter's Phone (734) 647-2525
E. State Transporter's ID
F. Transporter's Phone ( )
G. State Facility's ID
H. Facility's Phone (313) 923-0080

5. Transporter 1 Company Name: EQ INDUSTRIAL SERVICES
6. US EPA ID Number: MID000263871
7. Transporter 2 Company Name
8. US EPA ID Number

9. Designated Facility Name and Site Address
EQ DETROIT, INC.
1923 FREDERICK
DETROIT, MI 48211
10. US EPA ID Number: MID980991666

	11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID NUMBER).	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
GENERATOR a.	X RQ, HAZARDOUS WASTE LIQUIDS, N.O.S. 9 NA 3082 PGIII	001	TT	200 ~~2,000~~	G	D018
b.						
c.						
d.						

J. Additional Descriptions for Materials Listed Above
11a. IMD55114 / / / GROUNDWATER

K. Handling Codes for Wastes Listed Above
A.
B.
C.
D.

15. Special Handling Instructions and Additional Information
24 HOUR EMERGENCY PHONE NUMBER 800-839-3378
Reference: 4833300 - 0

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR; if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: X Douglas Bonnema
Signature: X
Date (Month Day Year): 08 13 05

TRANSPORTER
17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: John Makinen
Signature:
Date (Month Day Year): 08 13 05

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name
Signature
Date (Month Day Year)

FACILITY
19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name
Signature
Date (Month Day Year)

ALL SPILLS MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHIGAN AT 1-800-292-4706 OR OUT OF STATE AT 517-373-7660 AND THE NATIONAL RESPONSE CENTER AT 1-800-424-8802 24 HOURS PER DAY.

EPA Form 8700-22 (Rev. 9/88)
EQP 5110 Rev. 11/03

GENERATOR 1st COPY

MI0012995

General Instructions

Read all instructions before completing this form. This form has been designed for use on a 12-pitch (elite) typewriter/computer printer; a firm point pen may also be used - press down hard. Ensure all copies are legible.

Federal and state regulations require generators and transporters of hazardous waste and owners or operators of hazardous waste treatment, storage, and disposal facilities to use this form (8700-22) and, if necessary, the continuation sheet (Form 8700-22A) for both inter- and intrastate transportation of hazardous waste as defined in 40 CFR and Part 111 of Act 451 of 1994, as amended (Part 111). State regulations also require the use of this manifest for all regulated shipments of liquid industrial waste as required in Part 121 of Act 451 of 1994, as amended (Part 121).

Federal and State regulations provide for additional requirements, not included in these instructions, regarding the use and management of this form (40CFR, 49CFR, Part 111, Part 121).

Additional information such as "Rejected Load Procedures", state assigned identification numbers, manifest forms, etc., can be obtained by contacting the Michigan Department of Environmental Quality (MDEQ), Waste and Hazardous Materials Division's (WHMD) Internet Home Page at: http://www.michigan.gov/deq or you may contact the Manifest Unit directly at (517) 373-1217. Continuation sheets are not supplied by MDEQ.

Complete all items on the manifest. Enter "N/A" if any item does not apply. Leave items that may be needed later blank, such as second transporter.

Item 1. Enter the generator's U.S. EPA twelve digit identification number. For Part 121 manifested shipments where a generator does not have a U.S. EPA assigned number, a state assigned number must be obtained and used. The generator of the waste must enter a unique five digit manifest document number (e.g. 00001).

Item 2. Page number 1 of 1 should be recorded unless a continuation sheet is used, in which case the total number of pages, counting the initial manifest page, should be shown.

Item 3. Enter the name of the generator and the mailing address to which the manifest should be mailed. If the address of the site at which the waste was placed into transportation is different from the mailing address record the site address in Item J.

Item 4. Enter a telephone number (including area code) where an authorized agent of the generator can be reached in the event of an emergency and/or a partial or total rejected load.

NOTE: The 24 hour emergency phone number required for a hazardous materials shipping paper may be different from the generator's phone number.

Item 5. Enter the company name of the first transporter who will transport the waste.

Item 6. Enter the transporter's U.S. EPA twelve digit identification number. For Part 121 manifested shipments where a transporter does not have a U.S. EPA assigned number, a state assigned number is to be used.

Item 7. If using a second transporter, enter the company name.

Item 8. Enter the second transporter's U.S. EPA twelve digit identification number. For Part 121 manifested shipments where a transporter does not have a U.S. EPA assigned number, a state assigned number is to be used.

NOTE: If more than two transporters are used, the generator or third transporter shall initiate a continuation sheet. In item L of the continuation sheet, the generator/transporter must copy the State manifest document number listed in Item A. Every transport company used between the generator and the designated facility (except for intermediate rail or barge transporters used between the initial rail or barge carriers and the designated facility) must be listed. This is not intended to require multiple signatures for individual drivers working for one transporter. Item 2 is to be changed to reflect the added page(s). Continuation sheets must be appropriately completed in their entirely and properly distributed. Continuation sheets may not be used to list additional waste streams.

Item 9. Enter the company name and site address of the facility designated to receive the waste listed on this manifest.

Item 10. Enter the U.S. EPA twelve digit identification number for the designated facility described in Item 9. For Part 121 manifested shipments where a designated facility does not have a U.S. EPA assigned number, a state assigned number is to be used.

Item 11. Enter an X in the HM box if the waste is a hazardous material regulated by U.S. DOT. (See 49 CFR 172). Enter the required U.S. DOT shipping description, including Proper Shipping Name, Hazard Class or Division, ID Number (UN/NA), and packing group for each waste as identified in 49 CFR 172. Additional information may also be required in this space, including technical name and reportable quantity references. For only Part 121 regulated wastes include an appropriate shipping description for the waste stream.

Item 12. Enter the number of containers for each waste and the appropriate abbreviations listed below for the type of container. Each container type requires separate entry.

DM = Metal drums, barrels, kegs
DW = Wooden drum, barrels, kegs
DF = Fiberboard or plastic drums, barrels, kegs
DT = Dump Truck
TP = Tanks, portable
TT = Cargo tanks (tank trucks)
TC = Tank cars
CY = Cylinders
CM = Metal boxes, cartons, cases (including roll-offs)
CW = Wooden boxes, cartons, cases
CF = Fiber or plastic boxes, cartons, cases
BA = Burlap, cloth, paper/plastic bags

Item 13. Enter the total quantity of waste described on each line. Do not use decimals or fractions.

Item 14. Enter the appropriate abbreviation for the unit of measure listed below.

G = Gallons (liquids only)
P = Pounds
T = Tons (2000 lb.)
Y = Cubic Yards
L = Liters (liquids only)
K = Kilograms
M = Metric tons (1000 kg)
N = Cubic meters

Item 15. The generator may use this space to indicate special transportation, treatment, storage or disposal information. Import/Export information as noted in the "International Shipment" instructions section is to be recorded here.

Item 16. The generator must read, print his/her name, sign and date the certification statement.

Item 17. Print the name of the person accepting the waste on behalf of the first transporter. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

Item 18. If applicable, print the name of the person accepting the waste on behalf of the second transporter. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

Item 19. An authorized representative of the designated (or alternate) facility must note in this space any discrepancy in the waste shipment.

Item 20. Print the name of the person accepting the waste on behalf of the designated facility. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

NOTE: MDEQ "Rejected Load Procedures" provides guidance for partial or total load rejections.

Only the following information in the shaded area is a State of Michigan requirement:

Item A. A preprinted State manifest document number.

Item B - H. May be required by other states.

Item I. For hazardous wastes, enter the appropriate waste numbers found in R299.9212 through R299.9214 of Part 111 and 40 CFR 261 Subparts C and D. If more than one waste number is required to appropriately identify the waste, enter the additional numbers in Item J. In selecting the most appropriate waste number the following hierarchy must be used: acute waste (including P and acute F), u (toxic), k (specific sources), non-acute F (non-specific sources) and D (characteristic). State regulated wastes follow the same hierarchy as federally regulated wastes. For Part 121 wastes which are not hazardous wastes enter the appropriate code listed below

Mixed Solvents	007L	Storm Sewer Cleanouts	031L
Pharmaceutical	014L	Sanitary Sewer Cleanouts	032L
Crankcase Oil	017L	X-Ray / Photo Solutions	033L
Coolants and Water Soluble Oils	019L	Water Based Cleaning Solutions	034L
Other Oil (Describe in Item 11 or Item J)	021L	Car Wash Sludges	035L
Brine	022L	Grease Trap Wastes	036L
PCB	026L		
Other Wastes (Describe in Item 11 or Item J)	029L		
Antifreeze	030L		

Item J. Generators are to use this space for the site address if different from the mailing address noted in Item 3, additional waste codes, additional description for a Part 121 waste as noted in Item I of these instructions, approval of commingling authority as required in R299.9304(6).

Item K. List any specific codes which apply.

Burned for Energy Recovery	B
Conditionally Exempt Small Quantity Generator	C
Emergency Response Cleanup	E
Household Generated	H
Recycled Precious Metals	P
Recycled, Reclaimed, Used or Reused	R
Universal Waste	U

INTERNATIONAL SHIPMENTS

Exports- Transporters must sign and enter the date the waste leaves the United States in Item 15. The primary exporter must identify the point of departure from the United States.*

Imports- Shipments of hazardous and Part 121 regulated wastes must be accompanied by a U.S. EPA Uniform Hazardous Waste Manifest. Any person functioning as the U.S. Importer, as defined in Part 111, must complete the manifest as required in R299.9310.*

*Transporters of hazardous waste shipments must deliver a copy of the manifest to U.S. Customs when importing or exporting the waste across U.S. borders. Note the foreign waste manifest document number in Item J.

MANIFEST DISTRIBUTION

GENERATOR: Upon placing the waste into transportation (first transporter signs and dates manifest) remove the white and gold banded copies and give the remainder of the manifest copies to the transporter. Send the white copy to MDEQ no later than the tenth day of the month following the shipment. For shipments of wastes being transported to a designated facility outside of Michigan when an out-of-state manifest is used, mail to the MDEQ a photocopy of the manifest when the shipment is placed into transportation and mail a photocopy of the second generator manifest copy, when received.

TRANSPORTER: Upon delivery to the designated (or alternate) facility, and that facility signs and dates the manifest, the canary banded copy will be returned to you. If more than one transporter is used, the manifest is to be copied and supplied to the previous transporter acknowledging the receipt of the shipment by the next transporter. The canary banded copy stays with the manifest until the shipment reaches the designated facility.

DESIGNATED FACILITY: Upon signing and dating the manifest as received, give the canary banded copy to the transporter. Return the blue banded copy to the generator. Mail the pink banded copy to the MDEQ no later than the 10th day of the month following receipt of shipment.

ADDRESS ALL MDEQ MANIFEST COPIES TO:

WASTE AND HAZARDOUS MATERIALS DIVISION
MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
PO BOX 30038
LANSING MI 48909-7538

The public reporting burden for this collection of information is estimated to average 31 minutes for generators, 16 minutes for transporters, and 16 minutes for treatment, storage and disposal facilities. The record keeping burden per response for this collection of information is estimated to average 6 minutes for generators, 6 minutes for transporters, and 6 minutes for treatment, storage and disposal facilities. The burden associated with reading the regulations is estimated at 1 hour and 15 minutes annually. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency.

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB numbers for EPA's regulations are listed in 40 CFR Part 9 and 48 CFR Chapter 15. Send comments regarding these burden statements or any other aspect of this collection, including suggestions for reducing the burden, including through use of automated collection techniques to the Director, OPPE Regulatory Information Division, U.S. Environmental Protection Agency (2.37), 401 M St., S.W., Washington, D.C. 20460 and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Attention: Desk Officer for EPA, 725 17th Street, N.W., Washington, D.C. 20503. Include the OMB control number in any correspondance.

E.Q. Truck # 78 John

DEQ

WASTE AND HAZARDOUS MATERIALS DIVISION
MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY

DO NOT WRITE IN THIS SPACE
ATT. ☐ DIS. ☐ REJ. ☐ PR. ☐

Required under authority of Part 111 and Part 121 of Act 451, 1994, as amended.

Failure to file may subject you to criminal and/or civil penalties under Section 324.11151 or 324.12116 MCL.

Please print or type.

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: MID005354386
Manifest Document No.: 83760
2. Page 1 of 1
Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
WOLVERINE GASKET & MFG.
2638 PRINCESS
INKSTER, MI 48141
4. Generator's Phone ( ) (313) 562-6400

A. State Manifest Document Number: MI 10083760
B. State Generator's ID:

5. Transporter 1 Company Name: EQ INDUSTRIAL SERVICES
6. US EPA ID Number: MID000263871
C. State Transporter's ID:
D. Transporter's Phone: (734) 547-2525

7. Transporter 2 Company Name:
8. US EPA ID Number:
E. State Transporter's ID:
F. Transporter's Phone: ( )

9. Designated Facility Name and Site Address
EQ DETROIT, INC.
1923 FREDERICK
DETROIT, MI 48211
10. US EPA ID Number: MID980991566
G. State Facility's ID:
H. Facility's Phone: (313) 923-0080

11. US DOT Description (including Proper Shipping Name, [redacted] Class, and ID NUMBER).	HM		12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	X	RQ, HAZARDOUS WASTE LIQUIDS, N.O.S. 9 NA 3082 PGIII	001	TT	2000 ~~2,000~~	G	D018
b.							
c.							
d.							

J. Additional Descriptions for Materials Listed Above
11a. IM055114 / / / GROUNDWATER
outbound #4886392

K. Handling Codes for Wastes Listed Above
A.
B.
C.
D.

15. Special Handling Instructions and Additional Information
24 HOUR EMERGENCY PHONE NUMBER 800-839-3976
Reference: 4833300 - 0

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR; if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: X Douglas Rommer
Signature: X [signature]
Date: Month Day Year: 09 13 05

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: John Makinen
Signature: [signature]
Date: Month Day Year: 09 13 05

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name:
Signature:
Date: Month Day Year:

19. Discrepancy Indication Space
001

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: Tonya Steward
Signature: [signature]
Date: Month Day Year: 09 13 05

GENERATOR

TRANSPORTER

FACILITY

ALL SPILLS MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHIGAN AT 1-800-292-4706 OR OUT OF STATE AT 517-373-7660 AND THE NATIONAL RESPONSE CENTER AT 1-800-424-8802 24 HOURS PER DAY.

EPA Form 8700-22 (Rev. 9/88)

EQP 5110
Rev. 11/03

GENERATOR 2nd COPY

MI0012997

General Instructions

Read all instructions before completing this form. This form has been designed for use on a 12-pitch (elite) typewriter/computer printer; a firm point pen may also be used - press down hard. Ensure all copies are legible.

Federal and state regulations require generators and transporters of hazardous waste and owners or operators of hazardous waste treatment, storage, and disposal facilities to use this form (8700-22) and, if necessary, the continuation sheet (Form 8700-22A) for both inter- and intrastate transportation of hazardous waste as defined in 40 CFR and Part 111 of Act 451 of 1994, as amended (Part 111). State regulations also require the use of this manifest for all regulated shipments of liquid industrial waste as required in Part 121 of Act 451 of 1994, as amended (Part 121).

Federal and State regulations provide for additional requirements, not included in these instructions, regarding the use and management of this form (40CFR, 49CFR, Part 111, Part 121).

Additional information such as "Rejected Load Procedures", state assigned identification numbers, manifest forms, etc., can be obtained by contacting the Michigan Department of Environmental Quality (MDEQ), Waste and Hazardous Materials Division's (WHMD) Internet Home Page at: http://www.michigan.gov/deq or you may contact the Manifest Unit directly at (517) 373-1217. Continuation sheets are not supplied by MDEQ.

Complete all items on the manifest. Enter "N/A" if any item does not apply. Leave items that may be needed later blank, such as second transporter.

Item 1. Enter the generator's U.S. EPA twelve digit identification number. For Part 121 manifested shipments where a generator does not have a U.S. EPA assigned number, a state assigned number must be obtained and used. The generator of the waste must enter a unique five digit manifest document number (e.g. 00001).

Item 2. Page number 1 of 1 should be recorded unless a continuation sheet is used, in which case the total number of pages, counting the initial manifest page, should be shown.

Item 3. Enter the name of the generator and the mailing address to which the manifest should be mailed. If the address of the site at which the waste was placed into transportation is different from the mailing address record the site address in Item J.

Item 4. Enter a telephone number (including area code) where an authorized agent of the generator can be reached in the event of an emergency and/or a partial or total rejected load.

NOTE: The 24 hour emergency phone number required for a hazardous materials shipping paper may be different from the generator's phone number.

Item 5. Enter the company name of the first transporter who will transport the waste.

Item 6. Enter the transporter's U.S. EPA twelve digit identification number. For Part 121 manifested shipments where a transporter does not have a U.S. EPA assigned number, a state assigned number is to be used.

Item 7. If using a second transporter, enter the company name.

Item 8. Enter the second transporter's U.S. EPA twelve digit identification number. For Part 121 manifested shipments where a transporter does not have a U.S. EPA assigned number, a state assigned number is to be used.

NOTE: If more than two transporters are used, the generator or third transporter shall initiate a continuation sheet. In Item L of the continuation sheet, the generator/transporter must copy the State manifest document number listed in Item A. Every transport company used between the generator and the designated facility (except for intermediate rail or barge transporters used between the initial rail or barge carriers and the designated facility) must be listed. This is not intended to require multiple signatures for individual drivers working for one transporter. Item 2 is to be changed to reflect the added page(s). Continuation sheets must be appropriately completed in their entirely and properly distributed. Continuation sheets may not be used to list additional waste streams.

Item 9. Enter the company name and site address of the facility designated to receive the waste listed on this manifest.

Item 10. Enter the U.S. EPA twelve digit identification number for the designated facility described in Item 9. For Part 121 manifested shipments where a designated facility does not have a U.S. EPA assigned number, a state assigned number is to be used.

Item 11. Enter an X in the HM box if the waste is a hazardous material regulated by U.S. DOT, (See 49 CFR 172). Enter the required U.S. DOT shipping description, including Proper Shipping Name, Hazard Class or Division, ID Number (UN/NA), and packing group for each waste as identified in 49 CFR 172. Additional information may also be required in this space, including technical name and reportable quantity references. For only Part 121 regulated wastes include an appropriate shipping description for the waste stream.

Item 12. Enter the number of containers for each waste and the appropriate abbreviations listed below for the type of container. Each container type requires separate entry.

DM = Metal drums, barrels, kegs
DW = Wooden drum, barrels, kegs
DF = Fiberboard or plastic drums, barrels, kegs
DT = Dump Truck
TP = Tanks, portable
TT = Cargo tanks (tank trucks)
TC = Tank cars
CY = Cylinders
CM = Metal boxes, cartons, cases (including roll-offs)
CW = Wooden boxes, cartons, cases
CF = Fiber or plastic boxes, cartons, cases
BA = Burlap, cloth, paper/plastic bags

Item 13. Enter the total quantity of waste described on each line. Do not use decimals or fractions.

Item 14. Enter the appropriate abbreviation for the unit of measure listed below.

G = Gallons (liquids only)
P = Pounds
T = Tons (2000 lb.)
Y = Cubic Yards
L = Liters (liquids only)
K = Kilograms
M = Metric tons (1000 kg)
N = Cubic meters

Item 15. The generator may use this space to indicate special transportation, treatment, storage or disposal information. Import/Export information as noted in the "International Shipment" instructions section is to be recorded here.

Item 16. The generator must read, print his/her name, sign and date the certification statement.

Item 17. Print the name of the person accepting the waste on behalf of the first transporter. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

Item 18. If applicable, print the name of the person accepting the waste on behalf of the second transporter. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

Item 19. An authorized representative of the designated (or alternate) facility must note in this space any discrepancy in the waste shipment.

Item 20. Print the name of the person accepting the waste on behalf of the designated facility. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.

NOTE: MDEQ "Rejected Load Procedures" provides guidance for partial or total load rejections.

Only the following information in the shaded area is a State of Michigan requirement:

Item A. A preprinted State manifest document number.

Item B - H. May be required by other states.

Item I. For hazardous wastes, enter the appropriate waste numbers found in R299.9212 through R299.9214 of Part 111 and 40 CFR 261 Subparts C and D. If more than one waste number is required to appropriately identify the waste, enter the additional numbers in Item J. In selecting the most appropriate waste number the following hierarchy must be used: acute waste (including P and acute F), u (toxic), k (specific sources), non-acute F (non-specific sources) and D (characteristic). State regulated wastes follow the same hierarchy as federally regulated wastes. For Part 121 wastes which are not hazardous wastes enter the appropriate code listed below.

Mixed Solvents	007L	Storm Sewer Cleanouts	031L
Pharmaceutical	014L	Sanitary Sewer Cleanouts	032L
Crankcase Oil	017L	X-Ray / Photo Solutions	033L
Coolants and Water Soluble Oils	019L	Water Based Cleaning Solutions	034L
Other Oil (Describe in Item 11 or Item J)	021L	Car Wash Sludges	035L
Brine	022L	Grease Trap Wastes	036L
PCB	026L		
Other Wastes (Describe in Item 11 or Item J)	029L		
Antifreeze	030L		

Item J. Generators are to use this space for the site address if different from the mailing address noted in Item 3, additional waste codes, additional description for a Part 121 waste as noted in Item I of these instructions, approval of commingling authority as required in R299.9304(6).

Item K. List any specific codes which apply.

Burned for Energy Recovery	B
Conditionally Exempt Small Quantity Generator	C
Emergency Response Cleanup	E
Household Generated	H
Recycled Precious Metals	P
Recycled, Reclaimed, Used or Reused	R
Universal Waste	U

INTERNATIONAL SHIPMENTS

Exports- Transporters must sign and enter the date the waste leaves the United States in Item 15. The primary exporter must identify the point of departure from the United States.*

Imports- Shipments of hazardous and Part 121 regulated wastes must be accompanied by a U.S. EPA Uniform Hazardous Waste Manifest. Any person functioning as the U.S. Importer, as defined in Part 111, must complete the manifest as required in R299.9310.*

*Transporters of hazardous waste shipments must deliver a copy of the manifest to U.S. Customs when importing or exporting the waste across U.S. borders. Note the foreign waste manifest document number in Item J.

MANIFEST DISTRIBUTION

GENERATOR: Upon placing the waste into transportation (first transporter signs and dates manifest) remove the white and gold banded copies and give the remainder of the manifest copies to the transporter. Send the white copy to MDEQ no later than the tenth day of the month following the shipment. For shipments of wastes being transported to a designated facility outside of Michigan when an out-of-state manifest is used, mail to the MDEQ a photocopy of the manifest when the shipment is placed into transportation and mail a photocopy of the second generator manifest copy, when received.

TRANSPORTER: Upon delivery to the designated (or alternate) facility, and that facility signs and dates the manifest, the canary banded copy will be returned to you. If more than one transporter is used, the manifest is to be copied and supplied to the previous transporter acknowledging the receipt of the shipment by the next transporter. The canary banded copy stays with the manifest until the shipment reaches the designated facility.

DESIGNATED FACILITY: Upon signing and dating the manifest as received, give the canary banded copy to the transporter. Return the blue banded copy to the generator. Mail the pink banded copy to the MDEQ no later than the 10th day of the month following receipt of shipment.

ADDRESS ALL MDEQ MANIFEST COPIES TO:

WASTE AND HAZARDOUS MATERIALS DIVISION
MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
PO BOX 30038
LANSING MI 48909-7538

The public reporting burden for this collection of information is estimated to average 31 minutes for generators, 16 minutes for transporters, and 16 minutes for treatment, storage and disposal facilities. The record keeping burden per response for this collection of information is estimated to average 6 minutes for generators, 6 minutes for transporters, and 6 minutes for treatment, storage and disposal facilities. The burden associated with reading the regulations is estimated at 1 hour and 15 minutes annually. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency.

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB numbers for EPA's regulations are listed in 40 CFR Part 9 and 48 CFR Chapter 15. Send comments regarding these burden statements or any other aspect of this collection, including suggestions for reducing the burden, including through use of automated collection techniques to the Director, OPPE Regulatory Information Division, U.S. Environmental Protection Agency (2.37), 401 M St., S.W., Washington, D.C., 20460 and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Attention: Desk Officer for EPA, 725 17th Street, N.W., Washington, D.C. 20503. Include the OMB control number in any correspondence.

Land Disposal Restriction & Certification Form

Please check the appropriate facility:

☐	**Michigan Disposal Waste Treatment Plant**	49350 N. I-94 Service Drive, Belleville, MI 4811	MID 000 724 831
☐	**Wayne Disposal, Inc. Site #2 Landfill**	49350 N. I-94 Service Drive, Belleville, MI 4811	MID 048 090 633
✓	**EQ Detroit, Inc.**	1923 Frederick Street, Detroit, MI 48211	MID 980 991 566
☐	**EQ Resource Recovery, Inc.**	36345 Van Born Road, Romulus, MI 48174	MID 060 975 844
☐	**EQ North Carolina**	1005 Investment Blvd, Apex, NC 27502	NCD 982 170 292

Generator Name: WOLVERINE GASKET & MFG. Generator U.S. EPA #: MID005354386

Address: 2638 PRINCESS INKSTER, MI 48141

State Manifest#: MI 10083760 Manifest Doc. #: 83760

Instructions

Column 1: Identify all U.S. EPA hazardous waste codes that apply to this waste shipment.
Column 2: Choose the appropriate treatability group: Non-Wastewater (NWW) or Wastewater (WW).
Column 3: Enter the appropriate Subcategory, if applicable, and also enter "Contaminated Soil" or "Debris" if the waste will be treated using one of the alternative treatment technologies provided by 268.49(c) - soil, or 268.45 - debris.
Column 4: Enter the letter of the appropriate paragraph from pages 1-2 of this form.
Column 5: For F001-F005, F039, D001-D043, Debris & Contaminated Soil: please enter the Reference Number(s) for any constituents in your waste stream subject to treatment. The Reference Number(s) can be found in the EQ Resource Guide, LDR/UHC Constituent Table.

Manifest Line Item	U.S. EPA Hazardous Waste Code(s)	NWW or WW	Subcategory	How Must the Waste be Managed?	Reference Number(s) of Hazardous Constituents contained in the waste. Complete for F001-F005, F039, D001-D043, Soil & Debris wastes.
11.A	D018	NWW			40, 107, 135
11.B					
11.C					
11.D					

I hereby certify that all information submitted on this and all associated documents is complete and accurate to the best of my knowledge and information.

Generator Signature _____ Title _____

Printed Name _____ Date _____

How Must the Waste Be Managed?

S. THIS CONTAMINATED SOIL *DOES / DOES NOT* (circle one) CONTAIN LISTED HAZARDOUS WASTE AND *DOES / DOES NOT* (circle one) EXHIBIT A CHARACTERISTIC OF HAZARDOUS WASTE AND *IS SUBJECT TO / COMPLIES WITH* (circle one) THE SOIL TREATMENT STANDARDS AS PROVIDED BY 268.49 (c) OR THE UNIVERSAL TREATMENT STANDARDS. I certify under penalty of law that I have personally examined and am familiar with the treament technology and operation of the treatment process used to support this certification and believe that it has been maintained and operated properly so as to comply with treatment standards specified in 40 CFR 268.49 without impermissible dilution of the prohibited wastes. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment.

Reference: 4833300 - 0 9/12/2005 11:09 AM

THE ENVIRONMENTAL QUALITY COMPANY ®

Generator Approval Notification

September 12, 2005

Customer: ENVIRONMENTAL MGMT. ALTERNATIVE
Fax: (314) 785-6426

Doug R.

~~CHERYL~~ JAMES
WOLVERINE GASKET & MFG.
2638 PRINCESS
INKSTER, MI 48141

SEP 14 2005

This Generator Approval Notification acknowledges the acceptability of waste material(s) into the EQ environmental protection facility identified below and ensures that this facility has the appropriate permit(s) issued by federal and state regulatory agencies to properly transport, treat, and/or dispose of the waste material(s).

EQ FACILITY: EQ Detroit, Inc. (MID980991566)
1923 Frederick, Detroit, MI 48211

Approval Number: IM055114

Generator EPA ID: MID005354386
Waste Common Name: GROUNDWATER
Comments: EQRR PARALLEL A63105
Primary Waste Code: D018

Expires On: 9/9/2006

The Approval(s) listed above are based upon characterization information supplied to EQ by the Customer and the generator (if other than the Customer). The Customer is ultimately responsible for the accuracy and completeness of all such information, whether provided by the Customer or the generator. The Customer must notify the EQ Resource Team immediately upon knowledge of any changes to this information. This Approval and all wastes which are transported, delivered, or tendered to EQ under this Approval shall be subject to the attached Standard Terms and Conditions.

The Approval(s) will expire on the date(s) noted. Any new Approvals obtained from EQ on future business will be valid for a period of one (1) year from the date of issuance. Within 60 days of the Approval Expiration Date, you will be notified of the requirements for recertification.

THE ENVIRONMENTAL QUALITY COMPANY ®

Generator Approval Notification **February 14, 2005**

Customer: ENVIRONMENTAL MGMT. ALTERNATIVE
Fax: (314) 785-6426

D. Ronmeck.
CHERYL JAMES
WOLVERINE GASKET & MFG.
2638 PRINCESS
INKSTER, MI 48141 FEB 16 2005

This Generator Approval Notification acknowledges the acceptability of waste material(s) into the EQ environmental protection facility identified below and ensures that this facility has the appropriate permit(s) issued by federal and state regulatory agencies to properly transport, treat, and/or dispose of the waste material(s).

EQ FACILITY: EQ Detroit, Inc. (MID980991566)
1923 Frederick, Detroit, MI 48211

Approval Number: AP05671GAL

Generator EPA ID #: MID005354386 **Approved Container:** GAL **Expires On:** 12/30/2005
Waste Common Name: GROUND WATER - D018
Comments:

Primary Waste Code: D018

The Approval(s) listed above are based upon characterization information supplied to EQ by the Customer and the generator (if other than the Customer). The Customer is ultimately responsible for the accuracy and completeness of all such information, whether provided by the Customer or the generator. The Customer must notify the EQ Resource Team immediately upon knowledge of any changes to this information. This Approval and all wastes which are transported, delivered, or tendered to EQ under this Approval shall be subject to the attached Standard Terms and Conditions.

The Approval(s) will expire on the date(s) noted. Any new Approvals obtained from EQ on future business will be valid for a period of one (1) year from the date of issuance. Within 60 days of the Approval Expiration Date, you will be notified of the requirements for recertification.

36345 Van Born Road
Romulus, Michigan 48174
Phone: 734-727-5532
Fax: 734-326-4033

EQ-RESOURCE RECOVERY, INC

Fax

To: Pete Bennett **From:** Lisa Garapetian Wright

Fax: 314 785 6426 **Pages:** 4

Phone: **Date:** 1/6/05

Re: **CC:**

☐ **Urgent** ☐ **For Review** ☐ **Please Comment** ☐ **Please Reply** ☐ **Please Recycle**

• **Comments:**

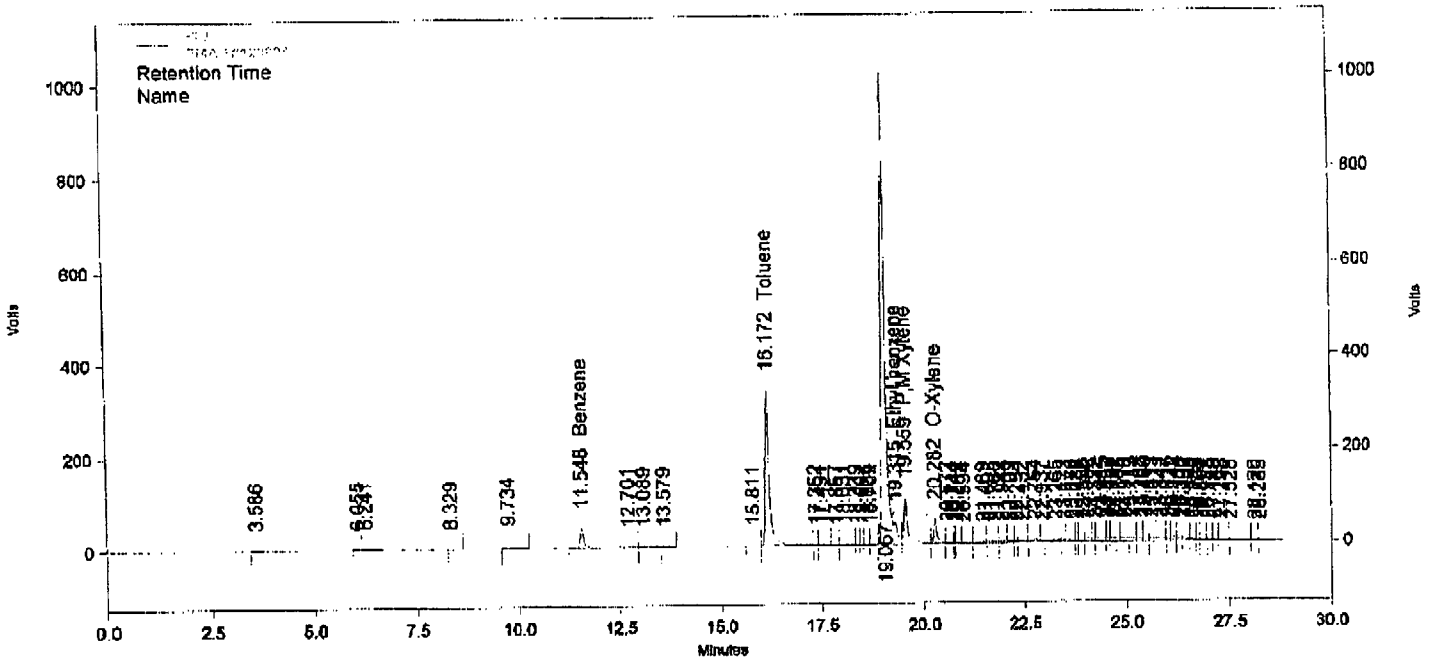
F-Scan +
BTEX results

If you have any questions, please feel free to contact me at 734-727-5532 or e-mail me at: lisa.garapetian@eqonline.com

Thanks!!

Purge and Trap Report

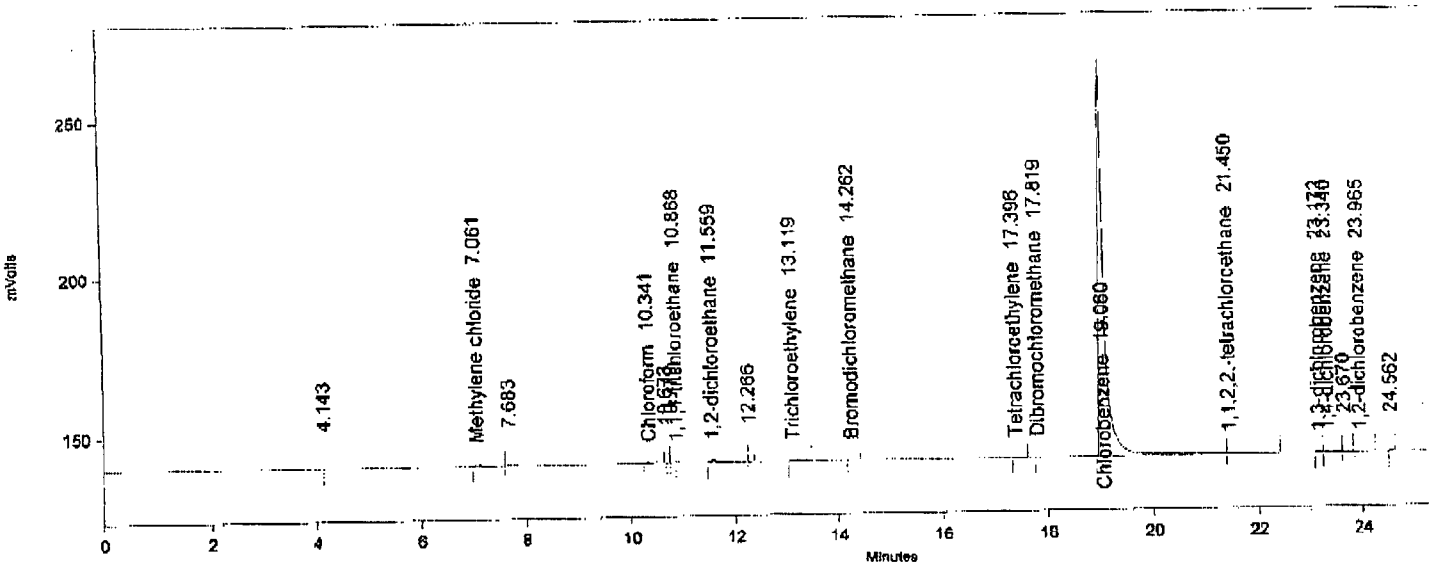
Sample ID: EMA T#120094 **Multiplication factor: 50**



PID Results

Pk #	Ret.Time	Area	Compound	Concentration (ppm)
6	11.548	311748	Benzene	2.379
11	16.172	2175098	Toluene	20.303
21	19.315	336683	Ethyl benzene	3.539
22	19.559	694538	P,M Xylene	2.940
23	20.282	317493	O-Xylene	3.053
Totals		3835560		32.212

Filename: C:\EZChrom Elite\Data\Purge and Trap\1-4-2005 1-58-23 PMEMA T#120094.dat **Method:** C:\EZChrom Elite\Methods\Purge and Trap\purge and trap.met
User: System **Acquired:** 1/4/2005 2:12:39 PM **Printed:** 1/4/2005 3:13:36 PM



ELCD Results

Pk #	Ret. Time	Area	Compound	Concentration (ppm)
			Dichlorodifluoromethane	0.000 BDL
			chloromethane	0.000 BDL
			Vinyl chloride	0.000 BDL
			Bromomethane	0.000 BDL
			Chloroethane	0.000 BDL
			Trichlorofluoromethane	0.000 BDL
			1,1-dichloroethylene	0.000 BDL
2	7.061	7739	Methylene chloride	0.185
			Trans 1,2-dichloroethane	0.000 BDL
			1,1-dichloroethane	0.000 BDL
4	10.341	2648	Chloroform	0.056
7	10.868	9	1,1,1-trichloroethane	0.000
			Carbon tetrachloride	0.000 BDL
8	11.559	6665	1,2-dichloroethane	0.107
10	13.119	1057	Trichloroethylene	0.020
			1,2-dichloropropane	0.000 BDL
11	14.262	175	Bromodichloromethane	0.003
			2-chloroethylvinyl ether	0.000 BDL
			Cis 1,3-dichloropropane	0.000 BDL
			Trans 1,3-dichloropropane	0.000 BDL
			1,1,2-trichloroethane	0.000 BDL
12	17.396	591	Tetrachloroethylene	0.011
13	17.819	69	Dibromochloromethane	0.001
14	19.060	963759	Chlorobenzene	62.757 (d)
			Bromoform	0.000 BDL
15	21.450	4900	1,1,2,2,-tetrachloroethane	0.086
16	23.172	157	1,3-dichlorobenzene	0.007
17	23.340	757	1,4-dichlorobenzene	0.019
19	23.965	288	1,2-dichlorobenzene	0.008
Totals		988814		63.260

Filename: C:\EZChrom Elite\Data\Purge and Trap\1-4-2005 1-58-23 PMEMA T#120094.dat **Method:** C:\EZChrom Elite\Methods\Purge and Trap\purge and trap.met
User: System **Acquired:** 1/4/2005 2:12:39 PM **Printed:** 1/4/2005 3:13:36 PM

Method: waterplant **Page 1** **Date: 1/3/05 3:31:19 PM**

Mean Data

ID: PQ 120094 Seq. No.: 47 Sample No.: 37 A/S Pos: 0
Sample Qty: 1.0000 mL Prep. Vol.: 1.0 mL Dilution: 1.0: 1.0
Data: Original Date: 1/3/05 3:30:44 PM

Element	Mean Corr. Intensity	Mean Conc.	Std.Dev.	Calib Units	Mean Conc.	Std.Dev.	Sample Units	RSD
01 As p197.197	-21.3	-0.118	0.0326	mg/L	-0.118	0.0326	mg/L	27.69%
01 As s193.69[illegible]	-69.8	-0.344	0.0288	mg/L	-0.344	0.0288	mg/L	8.37%
02 Ba p233.527	2529.9	0.094	0.0016	mg/L	0.094	0.0016	mg/L	1.73%
02 Ba s230.425	2202.1	0.087	0.0010	mg/L	0.087	0.0010	mg/L	1.12%
03 Cd p214.440	7.0	0.001	0.0003	mg/L	0.001	0.0003	mg/L	64.22%
03 Cd s226.502	41.6	0.004	0.0012	mg/L	0.004	0.0012	mg/L	27.24%
04 Cr p283.563	1136.0	0.029	0.0004	mg/L	0.029	0.0004	mg/L	1.43%
04 Cr s267.716	-25.2	-0.001	0.0020	mg/L	-0.001	0.0020	mg/L	142.98%
05 Cu p324.752	3275.0	0.069	0.0011	mg/L	0.069	0.0011	mg/L	1.56%
05 Cu s224.700	256.1	0.079	0.0025	mg/L	0.079	0.0025	mg/L	3.21%
06 Fe p238.204	155362.1	9.85	0.112	mg/L	9.85	0.112	mg/L	1.14%
06 Fe s259.939	326673.5	9.85	0.132	mg/L	9.85	0.132	mg/L	1.34%
07 Pb p220.353	9.7	0.009	0.0154	mg/L	0.009	0.0154	mg/L	180.90%
07 Pb s217.000	8.8	0.026	0.0481	mg/L	0.026	0.0481	mg/L	183.15%
08 Ni p232.003	84.7	0.018	0.0042	mg/L	0.018	0.0042	mg/L	24.24%
08 Ni s227.022	51.7	0.024	0.0025	mg/L	0.024	0.0025	mg/L	10.35%
09 Ag p328.068	118.5	0.004	0.0013	mg/L	0.004	0.0013	mg/L	35.10%
09 Ag s338.289	-250.8	-0.013	0.0052	mg/L	-0.013	0.0052	mg/L	40.89%
10 Zn p213.857	3109.8	0.230	0.0006	mg/L	0.230	0.0006	mg/L	0.25%
10 Zn s202.548	1433.7	0.246	0.0041	mg/L	0.246	0.0041	mg/L	1.66%
11 P p213.617	15.3	0.060	0.0153	mg/L	0.060	0.0153	mg/L	25.58%
11 P s214.914	11.8	0.036	0.0219	mg/L	0.036	0.0219	mg/L	60.25%
12 Co p228.616	-26.8	-0.003	0.0015	mg/L	-0.003	0.0015	mg/L	45.11%
12 Co s238.892	-25.8	-0.003	0.0042	mg/L	-0.003	0.0042	mg/L	154.95%
13 Sb p206.836	-2.0	-0.003	0.0146	mg/L	-0.003	0.0146	mg/L	417.14%
13 Sb s217.582	0.6	0.001	0.0027	mg/L	0.001	0.0027	mg/L	384.78%
14 Sn p189.927	-1.5	-0.003	0.0436	mg/L	-0.003	0.0436	mg/L	>999.9%
14 Sn s283.998	166.4	0.080	0.0155	mg/L	0.080	0.0155	mg/L	19.41%
15 Ti p334.940	1612.8	0.011	0.0008	mg/L	0.011	0.0008	mg/L	7.28%
15 Ti s336.12[illegible]	1245.0	0.010	0.0016	mg/L	0.010	0.0016	mg/L	15.68%
16 V p292.402	-53.3	-0.001	0.0002	mg/L	-0.001	0.0002	mg/L	12.32%
16 V s309.310	1003.9	0.014	0.0010	mg/L	0.014	0.0010	mg/L	7.66%

36345 Van Born Road
Romulus, Michigan 48174
Phone: 734-727-5532
Fax: 734-326-4033

EQ-RESOURCE RECOVERY, INC

Fax

To: Pete Benoit	**From:** Lisa Garapetian Wright
Fax: 314 785 6426	**Pages:** 4
Phone:	**Date:** 1/6/05
Re:	**CC:**

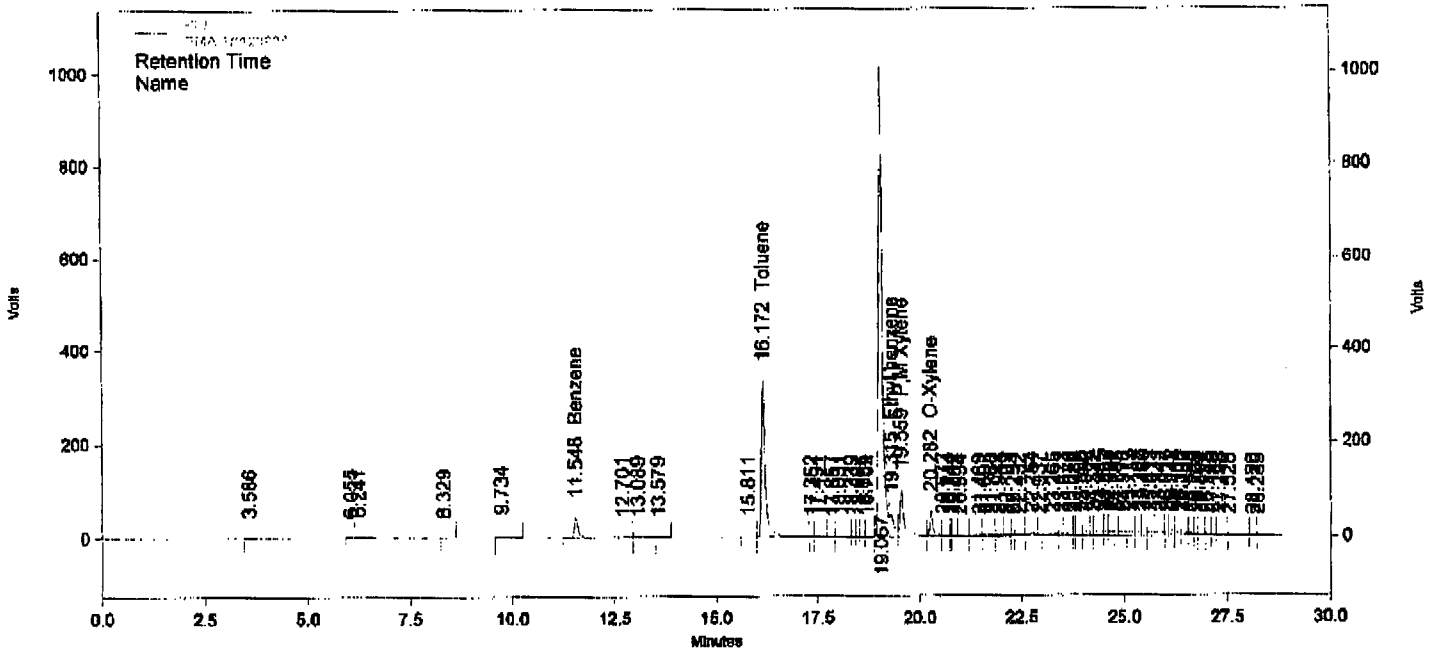
☐ **Urgent** ☐ **For Review** ☐ **Please Comment** ☐ **Please Reply** ☐ **Please Recycle**

• **Comments:**
F-Scan +
BTEX results

If you have any questions, please feel free to contact me at 734-727-5532 or e-mail me at: lisa.garapetian@eqonline.com

Thanks!!

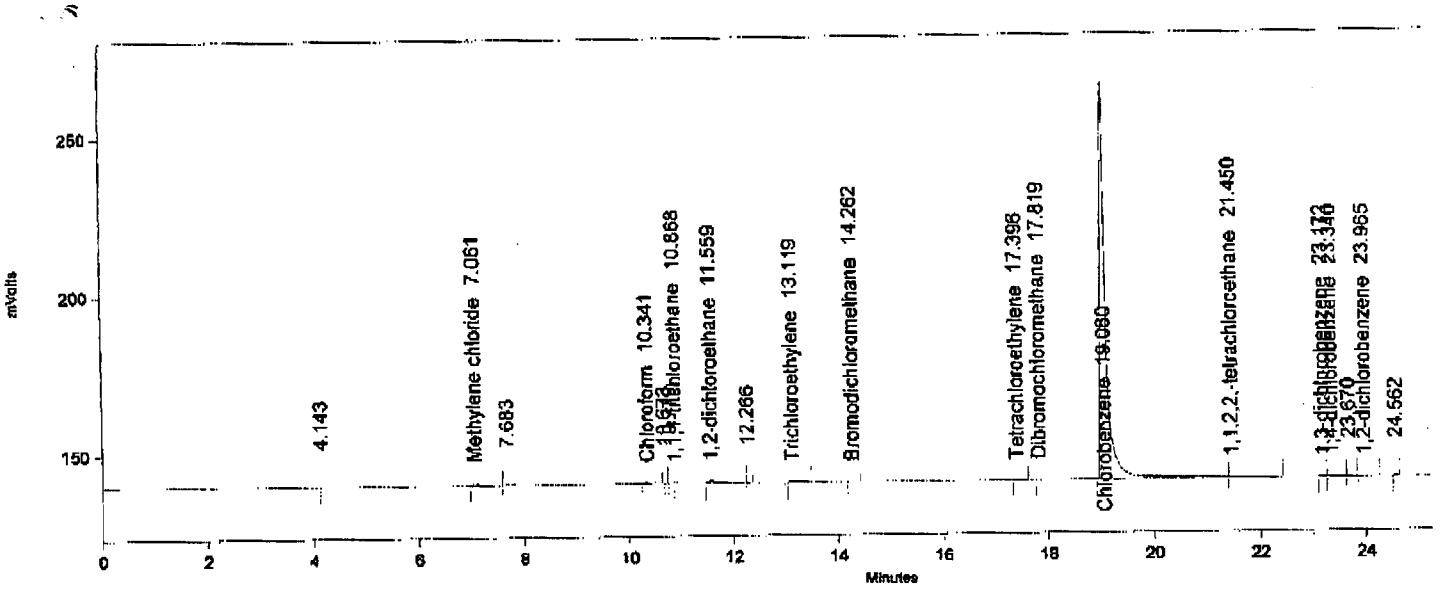
Purge and Trap Report Sample ID: EMA T#120094 Multiplication factor: 50



PID Results

Pk #	Ret.Time	Area	Compound	Concentration (ppm)
6	11.548	311748	Benzene	2.379
11	16.172	2175098	Toluene	20.303
21	19.315	336683	Ethyl benzene	3.539
22	19.559	694538	P,M Xylene	2.940
23	20.282	317493	O-Xylene	3.053
Totals		3835560		32.212

Filename: C:\EZChrom Elite\Data\Purge and Trap\1-4-2005 1-58-23 PMEMA T#120094.dat Method: C:\EZChrom Elite\Methods\Purge and Trap\purge and trap.met
User: System Acquired: 1/4/2005 2:12:39 PM Printed: 1/4/2005 3:13:36 PM



ELCD Results

Pk #	Ret. Time	Area	Compound	Concentration (ppm)
			Dichlorodifluoromethane	0.000 BDL
			chloromethane	0.000 BDL
			Vinyl chloride	0.000 BDL
			Bromomethane	0.000 BDL
			Chloroethane	0.000 BDL
			Trichlorofluoromethane	0.000 BDL
			1,1-dichloroethylene	0.000 BDL
2	7.061	7739	Methylene chloride	0.185
			Trans 1,2-dichloroethane	0.000 BDL
			1,1-dichloroethane	0.000 BDL
4	10.341	2648	Chloroform	0.056
7	10.868	9	1,1,1-trichloroethane	0.000
			Carbon tetrachloride	0.000 BDL
8	11.559	6665	1,2-dichloroethane	0.107
10	13.119	1057	Trichloroethylene	0.020
			1,2-dichloropropane	0.000 BDL
11	14.262	175	Bromodichloromethane	0.003
			2-chloroethylvinyl ether	0.000 BDL
			Cis 1,3-dichloropropane	0.000 BDL
			Trans 1,3-dichloropropane	0.000 BDL
			1,1,2-trichloroethane	0.000 BDL
12	17.396	591	Tetrachloroethylene	0.011
13	17.819	69	Dibromochloromethane	0.001
14	19.060	963759	Chlorobenzene	62.757 100
			Bromoform	0.000 BDL
15	21.450	4900	1,1,2,2,-tetrachloroethane	0.086
16	23.172	157	1,3-dichlorobenzene	0.007
17	23.340	757	1,4-dichlorobenzene	0.019
19	23.965	288	1,2-dichlorobenzene	0.008
Totals		988814		63.260

Filename: C:\EZChrom Elite\Data\Purge and Trap\1-4-2005 1-58-23 PMEMA T#120094.dat Method: C:\EZChrom Elite\Methods\Purge and Trap\purge and trap.met
User: System Acquired: 1/4/2005 2:12:39 PM Printed: 1/4/2005 3:13:36 PM Page 2 of 2

Method: waterplant **Page 1** **Date: 1/3/05 3:31:19 PM**

Mean Data

ID: PQ 120094 Seq. No.: 47 Sample No.: 37 A/S Pos: 0

Sample Qty: 1.0000 mL Prep. Vol.: 1.0 mL Dilution: 1.0: 1.0

Data: Original Date: 1/3/05 3:30:44 PM

Element	Mean Corr. Intensity	Mean Conc.	Calib Std.Dev.	Calib Units	Mean Conc.	Sample Std.Dev.	Sample Units	RSD
01 As p197.157	-21.3	-0.118	0.0326	mg/L	-0.118	0.0326	mg/L	27.69%
01 As s193.69[illegible]	-69.8	-0.344	0.0288	mg/L	-0.344	0.0288	mg/L	8.37%
02 Ba p233.52[illegible]	2529.9	0.094	0.0016	mg/L	0.094	0.0016	mg/L	1.73%
02 Ba s230.425	2202.1	0.087	0.0010	mg/L	0.087	0.0010	mg/L	1.12%
03 Cd p214.440	7.0	0.001	0.0003	mg/L	0.001	0.0003	mg/L	64.22%
03 Cd s226.502	41.6	0.004	0.0012	mg/L	0.004	0.0012	mg/L	27.24%
04 Cr p283.563	1136.0	0.029	0.0004	mg/L	0.029	0.0004	mg/L	1.43%
04 Cr s267.716	-25.2	-0.001	0.0020	mg/L	-0.001	0.0020	mg/L	142.98%
05 Cu p324.752	3275.0	0.069	0.0011	mg/L	0.069	0.0011	mg/L	1.56%
05 Cu s224.700	256.1	0.079	0.0025	mg/L	0.079	0.0025	mg/L	3.21%
06 Fe p238.204	155362.1	9.85	0.112	mg/L	9.85	0.112	mg/L	1.14%
06 Fe s259.939	126673.5	9.85	0.132	mg/L	9.85	0.132	mg/L	1.34%
07 Pb p220.353	9.7	0.009	0.0154	mg/L	0.009	0.0154	mg/L	180.90%
07 Pb s217.000	8.8	0.026	0.0481	mg/L	0.026	0.0481	mg/L	183.15%
08 Ni p232.003	84.7	0.018	0.0042	mg/L	0.018	0.0042	mg/L	24.24%
08 Ni s227.022	51.7	0.024	0.0025	mg/L	0.024	0.0025	mg/L	10.35%
09 Ag p328.068	118.5	0.004	0.0013	mg/L	0.004	0.0013	mg/L	35.10%
09 Ag s338.289	-230.8	-0.013	0.0052	mg/L	-0.013	0.0052	mg/L	40.89%
10 Zn p213.857	3479.8	0.230	0.0006	mg/L	0.230	0.0006	mg/L	0.25%
10 Zn s202.54[illegible]	1433.7	0.246	0.0041	mg/L	0.246	0.0041	mg/L	1.66%
11 P p213.617	15.3	0.060	0.0153	mg/L	0.060	0.0153	mg/L	25.58%
11 P s214.914	11.8	0.036	0.0219	mg/L	0.036	0.0219	mg/L	60.25%
12 Co p228.616	-26.8	-0.003	0.0015	mg/L	-0.003	0.0015	mg/L	45.11%
12 Co s238.892	-25.8	-0.003	0.0042	mg/L	-0.003	0.0042	mg/L	154.95%
13 Sb p206.836	-2.0	-0.003	0.0146	mg/L	-0.003	0.0146	mg/L	417.14%
13 Sb s217.582	0.6	0.001	0.0027	mg/L	0.001	0.0027	mg/L	384.78%
14 Sn p189.927	-1.5	-0.003	0.0436	mg/L	-0.003	0.0436	mg/L	>999.9%
14 Sn s283.998	166.4	0.080	0.0155	mg/L	0.080	0.0155	mg/L	19.41%
15 Ti p334.940	1612.8	0.011	0.0008	mg/L	0.011	0.0008	mg/L	7.28%
15 Ti s336.12[illegible]	1245.0	0.010	0.0016	mg/L	0.010	0.0016	mg/L	15.68%
16 V p292.402	-53.3	-0.001	0.0002	mg/L	-0.001	0.0002	mg/L	12.32%
16 V s309.310	1003.9	0.014	0.0010	mg/L	0.014	0.0010	mg/L	7.66%

THE ENVIRONMENTAL QUALITY COMPANY ®

Work Order: 4833300

EQ Industrial Services, Inc.

TSDF EQDETROI EQ DETROIT, INC.

EPA ID#: MID980991566
Phone: (313) 923-0080 **Fax:** (313) 923-3375
Address: 1923 FREDERICK
DETROIT, MI 48211

Contact:
Contact Phone: ( ) -

Directions: I-94 EAST TO CHENE STREET EXIT. GO RIGHT ON CHENE. ABOUT 3 BLOCKS GO RIGHT ON KIRBY. KIRBY DEAD ENDS INTO EQ DETROIT.

Comments:

APPROVAL: IM055114 **Waste Stream:** GRNDWATER **Manifest/BOL:** 1008376 **Line:** A

Waste Code: D018 **Quantity:** 2,000 gal.

Waste Desc: GROUNDWATER **Bill Unit:** GAL **#Containers:** 1

DOT Ship Name: RQ, HAZARDOUS WASTE LIQUIDS, N.O.S. **Disposal Sched:**

Hazard Class: 9 **Cont. Cd:** TT **Pkg Group:** III **UN/NA #:** **Confirmation #:**

Transporter 1: EQ INDUSTRIAL SERVICES **Transporter 2:** **Sched. Time:** :

Secondary Waste Codes:
D018

HOURS	Day 1 Tuesday			Day 2			Estimated Hours		
	Arrive	Leave	Scheduled		Arrive	Leave	Scheduled		To	At
Shop:	:	8:00	AM	Shop:	:	:			
Customer:	9:AM	11:50		Customer:	:	:		Customer:		
TSDF (Site A):	:	:	:	TSDF (Site A):	:	:	:	TSDF (Site A):		
TSDF (Site B):	:	:	:	TSDF (Site B):		:	:	TSDF (Site B):		
TSDF (Site C):	:	:	:	TSDF (Site C):	:	:	:	TSDF (Site C):		
Return Shop:	:			Return Shop:	:			Return Shop:		
Total Hours:	.			Total Hours:	.	Date:		Total Hours:		

DIRECTIONS TO SITE
94 east to Merriman. Merge onto Merriman North. Turn right on Michigan Ave. Right on Princess ave.

09·13·05 09·13·05

MI0013010

JOB SAFETY ASSESSMENT & TAILGATE SAFETY BRIEFING

Date: 9-13-05 Job Site: Wolverine Graphite Work Order #:

✓	PHYSICAL	Audit
✓	PRESSURE	
✓	VACUUM	
✓	TRIPS	
	FALLS (>6')	
✓	SLIP	
✓	NOISE	
	HEAT/FIRE	
✓	BENDING/TWISTING	
✓	LIFTING	
✓	PUSHING/PULLING	
✓	PINCH POINTS	
✓	FLYING OBJECTS	
	LOW OVERHEAD	
✓	ELECTRICAL	
✓	SHARP OBJECTS	
✓	TRAFFIC	

PRECAUTIONS & PPE

___ Ear Plugs	___ Safety Harness
___ Fall Protection	___ Life Line
___ Winch & Tripod	___ Kevlar Gloves
___ Hard Hat	___ Isolate/Relocate
✓ Safety Glasses	✓ Work/Rest Schedule
___ Face Shields	___ Back Belts
✓ Work Gloves	___ Metatarsal Foot Protection
✓ Steel Toe Shoes	___ Radio Communications
✓ Distance	___ GFCI's
___ Lockout/Tagout	✓ **Awareness**
___ Other:	

✓	CHEMICAL	Audit
✓	FLAMMABLE	
	CORROSIVE	
	REACTIVE	
	EXPLOSIVE	
✓	OXYGEN DEFICIENT	
✓	GASES/VAPORS	
✓	MISTS/FUMES/DUST	
✓	INHALATION	
✓	INGESTION	
✓	SKIN CONTACT	
✓	SKIN ABSORPTION	
✓	EYE CONTACT	

PRECAUTIONS & PPE

✓ Fire Extinguishers	___ Review MSDS
✓ Chemical Gloves	___ Chemical Goggles
___ APR/Dust Mask	✓ Safety Glasses
___ SAR/SCBA	___ Mechanical Ventilation
✓ Protective Suit	✓ Natural Ventilation
___ Face Shield	___ Separate Incompatibles
___ Air Monitoring	✓ Eliminate Ignition Sources
___ Level 'A' PPE	___ Level 'B' PPE
___ Level 'C' PPE	___ Level 'D' PPE
___ Other:	✓ **Awareness**

✓		
✓	HEAT STRESS	
	COLD STRESS	
	RAIN	
	LIGHTENING	
	ICE/SNOW	
	BIOLOGICAL	

___ Protective Clothing	✓ Shelter
✓ Work/Rest Schedule	___ Remove/Isolate
___ Other:	✓ **Awareness**

EMERGENCY PROCEDURES/PHONE: Cell Phone 911

ADDITIONAL SAFETY PRECAUTIONS:

___ Reviewed Plant Specific Safety Precautions
___ Reviewed Plant Specific Emergency Procedures
✓ Lockout Complete
___ Permits Complete: ___ Hot Work ___ Confined Space
___ All Equipment Inspected and Ready for Use

POST-JOB FOLLOW-UP ✓

	All equipment decontaminated and removed from the job site?		Job site checked? Work area clean?
	Lockout/Tags Removed?		Job Tickets complete and signed by the customer?
	Manifests complete, signed and copies distributed?		Job site checked by the customer? Job quality OK?

Audit Comments:

How could this job have been done better?

X [signature] X [signature]

A TAILGATE SAFETY BRIEFING IS REQUIRED AT EVERY SHIFT CHANGE.

Date/Time of Tailgate Safety Briefing: 9-13-05 0900 **Crew Members:**
Cancellation Time:
Crew Foreman/Supervisor: [signature]

WHITE - PROJECT FILE YELLOW - CUSTOMER PINK - SAFETY DEPARTMENT GREEN - EVALUATION SHEET

MI0013011

THE ENVIRONMENTAL QUALITY COMPANY ®

Work Order: 4833300

EQ Industrial Services, Inc.

Start Date: 9/13/2005 Site Time: 900am
End Date: 9/13/2005
Est. Time: 1.00 days

Prepared By: John Leonard
Type: Special Service

GENERATOR INFORMATION

Name: WOLVERINE GASKET & MFG.
EPA ID#: MID005354386
Phone: (313) 562-8400 Fax: (313) 562-8248
Address: 2638 PRINCESS
INKSTER, MI 48141

Contact Name: CHERYL JAMES
Title:

BILLING INFORMATION

Name: ENVIRONMENTAL MGMT. ALTERNATIVE
EQ Account #: 3340-04
Phone: (314) 785-6425 Fax: (314) 785-6426
Address:
10627 MIDWEST INDUSTRIAL DRIVE
ST LOUIS, MO 63132

Contact Name:
Title: Type:
Phone: ( ) - Pager: ( ) -

PROJECT

Quote #: Purchase Order: Arrive Shop:
Name: Release Code: # Loads:
Location: Inv.Brk.Value:

LABELS

Haz: 0 Non-Haz: 0 Class 3: Class 4.1: 0 Class 5.1: 0 Class 6.1: 0 Class 8: 0 Class 9: 0

DESCRIPTION

UNCOVER TOP OF U.S.T., CUT ADDITIONAL HOLES IF NECESSARY. VACUUM LIQUIDS AND TRANSPORT TO EQ DETROIT FOR DISPOSAL.

COMMENTS

JOB COMMENTS

Vacuum Out liquids, Cut Hole in tank and Wash out. Job Completed to Customer Satisfaction

ON SITE DIRECTIONS

SEE DOUG ROMMECK ON SITE FOR DIRECTIONS, 517-610-1136

EQUIPMENT

	Quantity		Unit	Description
PRESVAC		HOUR	78	Pres-Vac Unit, 3,000 gallon, w/o operator
STAKE		HOUR	287	Stake Truck Support Vehicle
WBKHOT		HOUR	72	Waterblaster 3,000 psi, Hot or steam unit

MI0013012

THE ENVIRONMENTAL QUALITY COMPANY ®

Work Order: 4833300

EQ Industrial Services, Inc.

LABOR	Quantity		Name	Description
OPERIS		HOUR	I Mack	Operator
TECH		HOUR	Lee J	Field Technician

SUPPLIES	Quantity Used		Quantity Requested	Description
ABSPAD		EACH	15.00	Absorbent Pad
BKT5		EACH	1.00	Bucket, 5 gallon
BROOM		EACH	1.00	Broom, Push
DUCTTAPE	1	ROLL	1.00	Duct Tape (rolls)
EXTCORD	50'	FOOT	100.00	Extension Cord, Feet
FUELCAN		EACH	1.00	Fuel Can filled with fuel
HOSE2VAC5	50'	FOOT	1.00	Hose, 2 inch, rubber, 1st 75 ft. w/unit - No charge
HOSE3VAC5	35'	FOOT	1.00	Hose, Rubber 3" Vacuum. 1st 75 ft. w/ unit - No charge
HSEGARD		FOOT	50.00	Garden Hose
HSEHYDPMF		FOOT	150.00	Hose, Hydraulic Pump, Supply
LIGHT		EACH	1.00	Light, Drop Light
PPEEARPLG	3	PAIR	4.00	PPE, Ear Plugs
PPEGLCL	3	PAIR	4.00	PPE, Gloves, Cloth
PPEGLPVC	3	EACH	4.00	PPE, Gloves, PVC
PPETVKSUT	1	EACH	2.00	PPE, Tyvek paper suits
RAGSBAIL	1	EACH	2.00	Rags, per pound
ROPE		EACH	1.00	Rope, Cloth or Nylon, per 20 ft sections
SAWZALL	1	DAY	1.00	Sawz All
SQGEE		EACH	1.00	Squeegee
STNDPIPE	1	EACH	1.00	Standpipe
VISQN		ROLL	1.00	Visqueen
WBGUN	1	EACH	2.00	Waterblaster, Landa/Hotsy gun

MI0013013

INLAND WATERS POLLUTION CONTROL, INC.

JAN - 3 2005

December 28, 2004

SENT VIA FAX
313-562-8248

Mr. Doug Rommeck
EAGLE PICHER AUTOMOTIVE
Wolverine Gasket
2638 Princess
Inkster, Michigan 48141

Re: Proposal – UST Inspection Opening
Wolverine Gasket
2638 Princess – Inkster, MI

Dear Mr. Rommeck:

In accordance with your request, Inland Waters Pollution Control, Inc. (IWPC) offers the following proposal for cutting an inspection hole into UST at the above-referenced location.

Scope of Services

IWPC proposes to furnish labor, material, equipment and supervision to complete the following:

- Break and remove approximately 4′ x 4′ sawcut concrete section.
- Hand excavate soil to top of UST.
- Cut opening (approximately 2 ½″ – 3″ in diameter) in UST top with pneumatic drill and cutting tools, as necessary for CRA to inspect/sample UST contents.
- Cover UST opening and backfill with excavated soil.

Cost

IWPC offers a budgetary estimate of **$1,200.00 (One Thousand and Two Hundred Dollars)** to complete the tasks described above.

Should you have any questions or require additional information, please contact our office.

Sincerely,
INLAND WATERS POLLUTION CONTROL, INC.

Wayne P. Lambert
Division Manager

WPL/ss

cc: Proposal File

Inland Waters Pollution Control, Inc.
2021 S. Schaefer Hwy.
Detroit, Michigan 48217-1239
313•841•5800 Fax # 313•841•5270
800•992•9118

DATE: 12/28/04

PROPOSAL#: RP04.189

SHORT CONTRACT

BILLING ADDRESS:

EAGLE PICHER AUTOMOTIVE
WOLVERINE GASKET
2638 PRINCESS
INKSTER MI 48141

JOB LOCATION ADDRESS:

WOLVERINE GASKET
2638 PRINCESS
INKSTER MI

CONTACT: DOUG ROMMECK

PHONE: 313.724.2006

FAX: 313.562.8248

JOB DESCRIPTION/SCOPE OF WORK:

SEE ATTACHED PROPOSAL

☑ Check if additional pages are attached (____ #of pages) ☐ T&M See attached price list ☐ Amount $ 12000

This authorizes Inland Waters Pollution Control, Inc. to furnish services to EAGLE PICHER AUTOMOTIVE (Company). The company agrees to all terms and conditions listed on the reverse side of this form.

Customer: [signature] Signature Douglas Rommeck Print Name Date: 1/5/05

~~Purchase Order~~ #: Submit Invoice

Proposal submitted by: JAMES ROZICKI Print Name Date: 12/28/04

INTERNAL USE ONLY

JOB TYPE: ____ VAC/IPS ____ SEW ____ TRS ____ ROL ____ RAS
____ OTHER ____ ASB ____ LAB ____ FCL ____ ER

New ☐ CUST.# ____ Salesperson # ____

New ☐ JOB # ____ Sales Mgr. Approval ____

COM: ____ APP CR: ____ Date: ____

1. **Payment terms.** The Contractor shall prepare (biweekly) invoices to the Customer for services under this Agreement, which invoices shall be paid by the Customer to the Contractor within thirty (30) days of receipt. Any payment past due shall accrue interest at the rate of 1.5% per month. Customer shall pay any costs of collection incurred by the Contractor including attorneys' fees.

2 **Identification of Ultimate Disposal Site.** It is agreed and understood that the Customer shall designate to the Contractor, the ultimate disposal sites for the subject waste to be disposed of under this Agreement. The Contractor may offer recommendations and/or alternatives concerning ultimate disposal sites, but it is agreed and understood that all final disposal site decisions shall be made by the Customer.

It is further agreed and understood that the Contractor shall not be responsible to pay any clean-up or related costs for said waste in the event any ultimate disposal site, selected by the Customer, becomes subject to an environmental clean-up action under CERCLA or a similar or related regulatory provision(s), and the Customers shall indemnify the Contractors for any such liability.

3. **Relationship of the Parties.** The relationship of the parties shall be limited to performance of this contract solely in accordance with its terms, and the parties intend that an independent contractor relationship be and hereby is created by this Agreement. The Contractor is not to be considered, or present itself to be an agent, employee, partner or legal representative of the Customer for any purpose, unless so authorized by the Customer in writing. Similarly, the Customer is not be considered, or present itself to be an agent, employee, partner, or legal representative of the Contractor for any purpose, at any time.

4. **Insurance.** Contractor shall procure and maintain at its expense during the term of this Agreement, insurance coverages:
   a) Worker's Compensation - statutory limits
   b) Employer's Liability - $500,000 each occurrence;
   c) General Liability - Personal Injury $1,000,000 per each occurrence; $1,000,000 annual aggregate:
   d) General Liability - Property Damage $1,000,000 per each occurrence; $1,000,000 annual aggregate; and
   e) Automotive Liability (property damage) - $1,000,000 each occurrence.

   Contractor shall provide to customer upon written request and insurance certificate confirming the above coverages, specifying coverage for this contract.

5. **Indemnification.** It is agreed and understood that the Contractor will indemnify the Customer and hold it harmless from any and all claims, demands, damages, penalties, costs and expenses (including reasonable attorney fee) which result from the negligent or willful acts or omissions of the Contractor, its employees or representatives, while the Contractor is providing services contracted for hereunder, except to the extent that the same have been caused in whole or in part, by the negligence of or willful act or omission of the Customer, their employees or representatives, or the breach by the Customer of its obligations under this Agreement.

   It is further agreed and understood that if the Contractor incurs any damages, penalties, costs or expenses resulting from the negligence of or willful act or omissions of the Customer, their employees or representatives, or from the breach by the Customer of its obligations under the Agreement, the Customer shall indemnify, reimburse, and hold the Contractor harmless of the same, except to the extent that the same have been caused by the gross negligence of or willful act or omission of the Contractor, its employees or representatives, or the breach by Contractor of its obligations under this Agreement.

   At any time in the future the Customer or Contractor believes a claim for indemnity may exist hereunder, it shall promptly, within ten (10) days, provide written notice of said claim to the indemnifying party. This notice shall describe in reasonable detail the facts and circumstances surrounding the claim.

6. **Force Majeure.** Neither the Contractor nor the Customer shall be held responsible for delays in performance or failures of performance (which otherwise would constitute a breach of this Agreement) when caused by fires, strikes, extreme weather conditions, epidemics, embargoes, directions of government, or other conditions of whatever nature or description beyond their respective, reasonable control, which delay performance or render performance commercially impracticable; provided, however the affected party must promptly notify the other party of the condition and the expected direction thereof; the affected party shall further undertake reasonable practices to remedy the Force Majeure condition performance under this Agreement as soon as reasonably possible thereafter. Failure to pay hereunder shall not be Force Majeure event.

7. **Miscellaneous.**
   A. This Agreement shall be binding upon and inure to the benefit of each of the parties, their successors and assigns.
   B. The laws of the State of Michigan shall govern the validity, performance and enforcement of this Agreement.
   C. This Agreement contains the entire agreement between the parties, and supercedes and annuls all prior agreements, contracts promises or representations, whether written or oral, between the parties.
   D. No contemporaneous or subsequent amendments, agreements, contracts, promises or representations shall be binding or effective between the parties, unless set forth in writing and signed by the parties.
   E. Any forbearance or failure or delay by either of the parties to exercise any right, power or remedy hereunder shall not be deemed to be a waiver of such right, power or remedy, and any single or partial exercise of any such right, power or remedy hereunder shall not preclude the further exercise thereof; and every right, power or remedy is waived specifically by an instrument in writing executed by such party.
   F. The party signing this Agreement represents and warrants that his execution, delivery and performance of this Agreement has been duly authorized by all necessary corporate and other action, and is valid and binding upon such company.

INLAND WATERS

FAX TRANSMISSION COVER SHEET

Date: 12/30/04

To: DOUG ROMMECK

Company: EAGLE PICHER

Fax: 313. 562. 8248

Re: WOLVERINE CONTRACT

- SHORT CONTRACT

- PROPOSAL

Sender:

YOU SHOULD RECEIVE 4 PAGE(S), INCLUDING THIS COVER SHEET. IF YOU DO NOT RECEIVE ALL THE PAGES, PLEASE CALL 313/841-5800 ext. 284.

DOUG, PLEASE SIGN AND RETURN.

THANKS

From the desk of:
James D. Rozycki
Project Manager
2021 S. Schaefer Hwy.
Detroit, Michigan 48217

313/841-5800 x284
Fax: 313/841-4155

INLAND WATERS POLLUTION CONTROL, INC

EaglePicher™ Automotive
Wolverine Gasket

FACSIMILE TRANSMISSION
FAX: 313-562-8248 Phone: 313-562-6400

Page 1 of 3

DATE: 1/05

To: James Rozycki
- Inland waters

cc:

FROM: Doug Rommeck

SUBJECT:

Send Invoice, I will
Assign PO #.

Thanks
D. Rommeck
313/724-2006

INLAND WATERS POLLUTION CONTROL, INC.

December 28, 2004

SENT VIA FAX
313-562-8248

Mr. Doug Rommeck
EAGLE PICHER AUTOMOTIVE
Wolverine Gasket
2638 Princess
Inkster, Michigan 48141

Re: Proposal – UST Inspection Opening
Wolverine Gasket
2638 Princess – Inkster, MI

Dear Mr. Rommeck:

In accordance with your request, Inland Waters Pollution Control, Inc. (IWPC) offers the following proposal for cutting an inspection hole into UST at the above-referenced location.

Scope of Services

IWPC proposes to furnish labor, material, equipment and supervision to complete the following:

- Break and remove approximately 4' x 4' sawcut concrete section.
- Hand excavate soil to top of UST.
- Cut opening (approximately 2 ½" – 3" in diameter) in UST top with pneumatic drill and cutting tools, as necessary for CRA to inspect/sample UST contents.
- Cover UST opening and backfill with excavated soil.

Cost

IWPC offers a budgetary estimate of **$1,200.00 (One Thousand and Two Hundred Dollars)** to complete the tasks described above.

Should you have any questions or require additional information, please contact our office.

Sincerely,
INLAND WATERS POLLUTION CONTROL, INC.

Wayne P. Lambert
Division Manager

WPL/ss

cc: Proposal File

INLAND WATERS POLLUTION CONTROL, INC.

November 10, 2004

Mr. Tom Kinney
CONESTOGA-ROVERS & ASSOCIATES
14496 Sheldon Road
Suite 200
Plymouth, MI 48170

Re: Proposal - Inspection Opening - UST
Inkster Project

Dear Mr. Kinney:

In accordance with your request, Inland Waters Pollution Control, Inc. (IWPC) offers the following proposal for cutting an inspection hole into UST at the above-referenced location.

Scope of Services

IPWC proposes to furnish all required labor, material equipment and supervision necessary to complete the following:

- Sawcut approximately 4' x 4' concrete floor.
- Break and remove concrete.
- Hand excavate soil to UST top.
- Cut opening (approximately 2 ½"-3" in diameter) in UST with pneumatic drill and cutting tools, as necessary for CRA to inspect/sample UST contents.

Note: The UST opening will remain open and the removed concrete and soil will remain on site. Backfilling and concrete pavement replacement not included.

Cost

IWPC proposes to furnish the above scope of services for the lump sum of **$1,938.00 (One Thousand Nine Hundred and Thirty-Eight Dollars).**

Should you have any questions or comments, please contact our office.

Sincerely,
INLAND WATERS POLLUTION CONTROL, INC.

Wayne P. Lambert
Division Manager

cc: Proposal File

2021 South Schaefer Highway Detroit, Michigan 48217 313-841-5800 800•992•9118 (24 hour service)

INLAND WATERS

2021 S. Schaefer Hwy.
Detroit, Michigan 48217-1239
313/841-5800
Fax: 313/841-4155

FAX TRANSMISSION COVER SHEET

Date: December 29, 2004

To: **Mr. Doug Rommeck**

Company: EAGLE PICHER AUTOMOTIVE

Fax: (313) 562-8248

Re: Proposal – UST Inspection Opening, Wolverine Gasket

Sender:
Wayne P. Lambert

You should receive _2_ page(s), including this cover sheet. If you do not receive all the pages, please call 313/841-5807 Ext. 258.

*Hard copy to be sent via U.S. Mail

INLAND WATERS
POLLUTION CONTROL INC.

From the desk of.....
Wayne P. Lambert
Division Manager

INLAND WATERS POLLUTION CONTROL, INC.

December 28, 2004

SENT VIA FAX
313-562-8248

Mr. Doug Rommeck
EAGLE PICHER AUTOMOTIVE
Wolverine Gasket
2638 Princess
Inkster, Michigan 48141

Re: Proposal - UST Inspection Opening
Wolverine Gasket
2638 Princess - Inkster, MI

Dear Mr. Rommeck:

In accordance with your request, Inland Waters Pollution Control, Inc. (IWPC) offers the following proposal for cutting an inspection hole into UST at the above-referenced location.

Scope of Services

IWPC proposes to furnish labor, material, equipment and supervision to complete the following:

- Break and remove approximately 4' x 4' sawcut concrete section.
- Hand excavate soil to top of UST.
- Cut opening (approximately 2 ½" - 3" in diameter) in UST top with pneumatic drill and cutting tools, as necessary for CRA to inspect/sample UST contents.
- Cover UST opening and backfill with excavated soil.

Cost

IWPC offers a budgetary estimate of **$1,200.00 (One Thousand and Two Hundred Dollars)** to complete the tasks described above.

Should you have any questions or require additional information, please contact our office.

Sincerely,
INLAND WATERS POLLUTION CONTROL, INC.

Wayne P. Lambert
Division Manager

WPL/ss

cc: Proposal File

SEVERN TRENT STL

STL North Canton
4101 Shuffel Drive NW
North Canton, OH 44720

Tel: 330 497 9396 Fax: 330 497 0772
www.stl-inc.com

ANALYTICAL REPORT

PROJECT NO. 35298

EAGLE PICHER

Lot #: A4K050155

Paul Wiseman

Conestoga Rovers & Assoc., Inc
14496 Sheldon Rd Suite 200
Plymouth, MI 48170

SEVERN TRENT LABORATORIES, INC.

Kenneth J. Kuzior
Project Manager

November 22, 2004

CASE NARRATIVE

A4K050155

The following report contains the analytical results for one solid sample submitted to STL North Canton by Conestoga-Rovers & Associates, Inc. from the Eagle Picher Site, project number 35298. The sample was received November 05, 2004, according to documented sample acceptance procedures.

STL utilizes USEPA approved methods in all analytical work. The sample presented in this report was analyzed for the parameter(s) listed on the analytical methods summary page in accordance with the method(s) indicated. A summary of QC data for these analyses is included at the back of the report.

STL North Canton attests to the validity of the laboratory data generated by STL facilities reported herein. All analyses performed by STL facilities were done using established laboratory SOPs that incorporate QA/QC procedures described in the applicable methods. STL's operations groups have reviewed the data for compliance with the laboratory QA/QC plan, and data have been found to be compliant with laboratory protocols unless otherwise noted below.

All solid sample results are reported on an "as received" basis unless otherwise indicated by a dry weight adjustment footnote at the bottom of the analytical report page. The list of parameters which are never reported on a dry weight basis is included on the Sample Summary.

The test results in this report meet all NELAP requirements for parameters for which accreditation is required or available. Any exceptions to NELAP requirements are noted in this report. Pursuant to NELAP, this report may not be reproduced, except in full, without the written approval of the laboratory.

If you have any questions, please call the Project Manager, Kenneth J. Kuzior, at 330-497-9396.

This report is sequentially paginated. The final page of the report is labeled as "END OF REPORT."

SUPPLEMENTAL QC INFORMATION

SAMPLE RECEIVING

The temperature of the cooler upon sample receipt was 4.8°C.

MI0013024

CASE NARRATIVE (continued)

GC/MS VOLATILES

The sample(s) that contain results between the MDL and the RL were flagged with "J". There is a possibility of false positive or mis-identification at these quantitation levels. In analytical methods requiring confirmation of the analyte reported, confirmation was performed only down to the standard reporting limit (SRL). The acceptance criteria for QC samples may not be met at these quantitation levels.

GENERAL CHEMISTRY

The analytical results met the requirements of the laboratory's QA/QC program.

MI0013025

QUALITY CONTROL ELEMENTS OF SW-846 METHODS

STL North Canton conducts a quality assurance/quality control (QA/QC) program designed to provide scientifically valid and legally defensible data. Toward this end, several types of quality control indicators are incorporated into the QA/QC program, which is described in detail in QA Policy, QA-003. These indicators are introduced into the sample testing process to provide a mechanism for the assessment of the analytical data.

QC BATCH

Environmental samples are taken through the testing process in groups called QUALITY CONTROL BATCHES (QC batches). A QC batch contains up to twenty environmental samples of a similar matrix (water, soil) that are processed using the same reagents and standards. STL North Canton requires that each environmental sample be associated with a QC batch.

Several quality control samples are included in each QC batch and are processed identically to the twenty environmental samples. These QC samples include a METHOD BLANK (MB), a LABORATORY CONTROL SAMPLE (LCS) and, where appropriate, a MATRIX SPIKE/MATRIX SPIKE DUPLICATE (MS/MSD) pair or a MATRIX SPIKE/SAMPLE DUPLICATE (MS/DU) pair. If there is insufficient sample to perform an MS/MSD or an MS/DU, then a LABORATORY CONTROL SAMPLE DUPLICATE (LCSD) is included in the QC batch.

LABORATORY CONTROL SAMPLE

The Laboratory Control Sample is a QC sample that is created by adding known concentrations of a full or partial set of target analytes to a matrix similar to that of the environmental samples in the QC batch. The LCS analyte recovery results are used to monitor the analytical process and provide evidence that the laboratory is performing the method within acceptable guidelines. All control analytes indicated by a bold type in the LCS must meet acceptance criteria. Failure to meet the established recovery guidelines requires the repreparation and reanalysis of all samples in the QC batch. The only exception is that if the LCS recoveries are biased high and the associated sample is ND for the parameter(s) of interest, the batch is acceptable.

At times, a Laboratory Control Sample Duplicate (LCSD) is also included in the QC batch. An LCSD is a QC sample that is created and handled identically to the LCS. Analyte recovery data from the LCSD is assessed in the same way as that of the LCS. The LCSD recoveries, together with the LCS recoveries, are used to determine the reproducibility (precision) of the analytical system. Precision data are expressed as relative percent differences (RPDs). If the RPD fails for an LCS/LCSD and yet the recoveries are within acceptance criteria, the batch is still acceptable.

METHOD BLANK

The Method Blank is a QC sample consisting of all the reagents used in analyzing the environmental samples contained in the QC batch. Method Blank results are used to determine if interference or contamination in the analytical system could lead to the reporting of false positive data or elevated analyte concentrations. All target analytes must be below the reporting limits (RL), the analytes were greater than 10 times the blank level for organics or 20 times for inorganics, or the associated sample(s) must be ND except for the common laboratory contaminants indicated below.

Volatile (GC or GC/MS)	Semivolatile (GC/MS)	Metals
Methylene chloride	Phthalate Esters	Copper
Acetone		Iron
2-Butanone		Zinc
		Lead*

** for analyses run on TJA Trace ICP only*

The listed volatile and semivolatile compounds may be present in concentrations up to 5 times the reporting limits. Failure to meet these Method Blank criteria requires the repreparation and reanalysis of all samples in the QC batch.

MI0013026

QUALITY CONTROL ELEMENTS OF SW-846 METHODS
(Continued)

MATRIX SPIKE/MATRIX SPIKE DUPLICATE

A Matrix Spike and a Matrix Spike Duplicate are a pair of environmental samples to which known concentrations of a full or partial set of target analytes are added. The MS/MSD results are determined in the same manner as the results of the environmental sample used to prepare the MS/MSD. The analyte recoveries and the relative percent differences (RPDs) of the recoveries are calculated and used to evaluate the effect of the sample matrix on the analytical results. Due to the potential variability of the matrix of each sample, the MS/MSD results may not have an immediate bearing on any samples except the one spiked; therefore, the associated batch MS/MSD may not reflect the same compounds as the samples contained in the analytical report. When these MS/MSD results fail to meet acceptance criteria, the data is evaluated. If the LCS is within acceptance criteria, the batch is considered acceptable. The acceptance criteria does not apply to samples that are diluted for organics if the native sample amount is 4x the concentration of the spike for inorganics.

For certain methods, a Matrix Spike/Sample Duplicate (MS/DU) may be included in the QC batch in place of the MS/MSD. For the parameters (i.e. pH, ignitability) where it is not possible to prepare a spiked sample, a Sample Duplicate may be included in the QC batch. However, a Sample Duplicate is less likely to provide usable precision statistics depending on the likelihood of finding concentrations below the standard reporting limit. When the Sample Duplicate result fails to meet acceptance criteria, the data is evaluated.

SURROGATE COMPOUNDS

In addition to these batch-related QC indicators, each organic environmental and QC sample are spiked with surrogate compounds. Surrogates are organic chemicals that behave similarly to the analytes of interest and that are rarely present in the environment. Surrogate recoveries are used to monitor the individual performance of a sample in the analytical system.

If the surrogate recoveries are outside criteria for environmental or MS/MSD samples, the batch is acceptable if the Method Blank, LCS, and LCSD surrogate recoveries are within acceptance criteria. The only exception is if the surrogate recoveries are biased high in the LCS, LCSD, or the Method Blank and the associated sample(s) are ND, the batch is acceptable. If the LCS, LCSD, or Method Blank surrogate(s) fail to meet recovery criteria, the entire sample batch is reprepared and reanalyzed.

For the *GC/MS* BNA methods, the surrogate criterion is that two of the three surrogates for each fraction must meet acceptance criteria. The third surrogate must have a recovery of ten percent or greater.

For the Pesticide/PCB and PAH methods, the surrogate criteria is that one of two surrogate compounds meet acceptance criteria.

EXECUTIVE SUMMARY - Detection Highlights

A4K050155

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD
S-35298-110404-BF-036 11/04/04 14:30	**001**			
Benzene	190000	12000	ug/kg	SW846 8260B
Chlorobenzene	440000	12000	ug/kg	SW846 8260B
Ethylbenzene	78000	12000	ug/kg	SW846 8260B
Xylenes (total)	270000	37000	ug/kg	SW846 8260B
Percent Solids	77.1	10.0	%	MCAWW 160.3 MOD

MI0013028

ANALYTICAL METHODS SUMMARY

A4K050155

PARAMETER	ANALYTICAL METHOD
Total Residue as Percent Solids	MCAWW 160.3 MOD
Volatile Organics by GC/MS	SW846 8260B

References:

MCAWW "Methods for Chemical Analysis of Water and Wastes", EPA-600/4-79-020, March 1983 and subsequent revisions.

SW846 "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods", Third Edition, November 1986 and its updates.

MI0013029

SAMPLE SUMMARY

A4K050155

WO #	SAMPLE#	CLIENT SAMPLE ID	SAMPLED DATE	SAMP TIME
GWAXC	001	S-35298-110404-BF-036	11/04/04	14:30

NOTE(S):

- The analytical results of the samples listed above are presented on the following pages.
- All calculations are performed before rounding to avoid round-off errors in calculated results.
- Results noted as "ND" were not detected at or above the stated limit.
- This report must not be reproduced, except in full, without the written approval of the laboratory.
- Results for the following parameters are never reported on a dry weight basis: color, corrosivity, density, flashpoint, ignitability, layers, odor, paint filter test, pH, porosity pressure, reactivity, redox potential, specific gravity, spot tests, solids, solubility, temperature, viscosity, and weight.

MI0013030

Conestoga-Rovers & Associates, Inc.

Client Sample ID: S-35298-110404-BF-036

GC/MS Volatiles

Lot-Sample #...: A4K050155-001 **Work Order #...:** GWAXC1AC **Matrix.....:** SO
Date Sampled...: 11/04/04 14:30 **Date Received..:** 11/05/04
Prep Date.....: 11/05/04 **Analysis Date..:** 11/17/04
Prep Batch #...: 4322182
Dilution Factor: 190.84
% Moisture.....: 23 **Method.....:** SW846 8260B

PARAMETER	RESULT	REPORTING LIMIT	UNITS
Acetone	ND	190000	ug/kg
Benzene	**190000**	**12000**	**ug/kg**
Bromodichloromethane	ND	25000	ug/kg
Bromoform	ND	25000	ug/kg
Bromomethane	ND	62000	ug/kg
2-Butanone	ND	190000	ug/kg
Carbon disulfide	ND	62000	ug/kg
Carbon tetrachloride	ND	12000	ug/kg
Chlorobenzene	**440000**	**12000**	**ug/kg**
Chloroethane	ND	62000	ug/kg
Chloroform	ND	12000	ug/kg
Chloromethane	ND	62000	ug/kg
Cyclohexane	ND	300000	ug/kg
Dibromochloromethane	ND	12000	ug/kg
1,2-Dibromo-3-chloro-propane	ND	62000	ug/kg
1,2-Dibromoethane	ND	62000	ug/kg
1,2-Dichlorobenzene	ND	25000	ug/kg
1,3-Dichlorobenzene	ND	25000	ug/kg
1,4-Dichlorobenzene	ND	25000	ug/kg
Dichlorodifluoromethane	ND	25000	ug/kg
1,1-Dichloroethane	ND	12000	ug/kg
1,2-Dichloroethane	ND	12000	ug/kg
1,1-Dichloroethene	ND	12000	ug/kg
cis-1,2-Dichloroethene	ND	12000	ug/kg
trans-1,2-Dichloroethene	ND	12000	ug/kg
1,2-Dichloropropane	ND	12000	ug/kg
cis-1,3-Dichloropropene	ND	12000	ug/kg
trans-1,3-Dichloropropene	ND	12000	ug/kg
Ethylbenzene	**78000**	**12000**	**ug/kg**
2-Hexanone	ND	620000	ug/kg
Isopropylbenzene	ND	62000	ug/kg
Methyl acetate	ND	300000	ug/kg
Methylene chloride	ND	62000	ug/kg
Methylcyclohexane	ND	300000	ug/kg
4-Methyl-2-pentanone	ND	620000	ug/kg
Methyl tert-butyl ether	ND	62000	ug/kg
Styrene	ND	12000	ug/kg

(Continued on next page)

MI0013031

Conestoga-Rovers & Associates, Inc.

Client Sample ID: S-35298-110404-BF-036

GC/MS Volatiles

Lot-Sample #...: A4K050155-001 Work Order #...: GWAXC1AC Matrix.....: SO

PARAMETER	RESULT	REPORTING LIMIT	UNITS
1,1,2,2-Tetrachloroethane	ND	25000	ug/kg
Tetrachloroethene	ND	12000	ug/kg
Toluene	ND	25000	ug/kg
1,2,4-Trichloro-benzene	ND	62000	ug/kg
1,1,1-Trichloroethane	ND	12000	ug/kg
1,1,2-Trichloroethane	ND	12000	ug/kg
Trichloroethene	ND	12000	ug/kg
Trichlorofluoromethane	ND	25000	ug/kg
1,1,2-Trichloro-1,2,2-trifluoroethane	ND	62000	ug/kg
Vinyl chloride	ND	25000	ug/kg
Xylenes (total)	**270000**	**37000**	**ug/kg**

SURROGATE	PERCENT RECOVERY	RECOVERY LIMITS
Dibromofluoromethane	0.0 DIL,*	(59 - 138)
1,2-Dichloroethane-d4	0.0 DIL,*	(61 - 130)
Toluene-d8	6.1 DIL,*	(60 - 143)
4-Bromofluorobenzene	11 DIL,*	(47 - 158)

NOTE(S):

DIL The concentration is estimated or not reported due to dilution or the presence of interfering analytes.

* Surrogate recovery is outside stated control limits.

Results and reporting limits have been adjusted for dry weight.

MI0013032

Conestoga-Rovers & Associates, Inc.

Client Sample ID: S-35298-110404-BF-036

General Chemistry

Lot-Sample #...: A4K050155-001 Work Order #...: GWAXC Matrix.....: SO
Date Sampled...: 11/04/04 14:30 Date Received..: 11/05/04
% Moisture.....: 23

PARAMETER	RESULT	RL	UNITS	METHOD	PREPARATION-ANALYSIS DATE	PREP BATCH #
Percent Solids	77.1	10.0	%	MCAWW 160.3 MOD	11/10-11/11/04	4315502

Dilution Factor: 1

SEVERN TRENT STL

QUALITY CONTROL SECTION

MI0013034

METHOD BLANK REPORT

GC/MS Volatiles

Client Lot #...: A4K050155 **Work Order #...:** GW5LF1AA **Matrix.....:** SOLID
MB Lot-Sample #: A4K170000-182

Prep Date.....: 11/05/04
Analysis Date..: 11/16/04 **Prep Batch #...:** 4322182
Dilution Factor: 1

PARAMETER	RESULT	REPORTING LIMIT	UNITS	METHOD
Acetone	ND	750	ug/kg	SW846 8260B
Benzene	ND	50	ug/kg	SW846 8260B
Bromodichloromethane	ND	100	ug/kg	SW846 8260B
Bromoform	ND	100	ug/kg	SW846 8260B
Bromomethane	ND	250	ug/kg	SW846 8260B
2-Butanone	ND	750	ug/kg	SW846 8260B
Carbon disulfide	ND	250	ug/kg	SW846 8260B
Carbon tetrachloride	ND	50	ug/kg	SW846 8260B
Chlorobenzene	ND	50	ug/kg	SW846 8260B
Chloroethane	ND	250	ug/kg	SW846 8260B
Chloroform	ND	50	ug/kg	SW846 8260B
Chloromethane	ND	250	ug/kg	SW846 8260B
Cyclohexane	ND	1200	ug/kg	SW846 8260B
Dibromochloromethane	ND	50	ug/kg	SW846 8260B
1,2-Dibromo-3-chloro-propane	ND	250	ug/kg	SW846 8260B
1,2-Dibromoethane	ND	250	ug/kg	SW846 8260B
1,2-Dichlorobenzene	ND	100	ug/kg	SW846 8260B
1,3-Dichlorobenzene	ND	100	ug/kg	SW846 8260B
1,4-Dichlorobenzene	ND	100	ug/kg	SW846 8260B
Dichlorodifluoromethane	ND	100	ug/kg	SW846 8260B
1,1-Dichloroethane	ND	50	ug/kg	SW846 8260B
1,2-Dichloroethane	ND	50	ug/kg	SW846 8260B
1,1-Dichloroethene	ND	50	ug/kg	SW846 8260B
cis-1,2-Dichloroethene	ND	50	ug/kg	SW846 8260B
trans-1,2-Dichloroethene	ND	50	ug/kg	SW846 8260B
1,2-Dichloropropane	ND	50	ug/kg	SW846 8260B
cis-1,3-Dichloropropene	ND	50	ug/kg	SW846 8260B
trans-1,3-Dichloropropene	ND	50	ug/kg	SW846 8260B
Ethylbenzene	ND	50	ug/kg	SW846 8260B
2-Hexanone	ND	2500	ug/kg	SW846 8260B
Isopropylbenzene	ND	250	ug/kg	SW846 8260B
Methyl acetate	ND	1200	ug/kg	SW846 8260B
Methylene chloride	ND	250	ug/kg	SW846 8260B
Methylcyclohexane	ND	1200	ug/kg	SW846 8260B
4-Methyl-2-pentanone	ND	2500	ug/kg	SW846 8260B
Methyl tert-butyl ether	ND	250	ug/kg	SW846 8260B
Styrene	ND	50	ug/kg	SW846 8260B
1,1,2,2-Tetrachloroethane	ND	100	ug/kg	SW846 8260B
Tetrachloroethene	ND	50	ug/kg	SW846 8260B
Toluene	ND	100	ug/kg	SW846 8260B

(Continued on next page)

MI0013035

METHOD BLANK REPORT

GC/MS Volatiles

Client Lot #...: A4K050155 **Work Order #...:** GW5LF1AA **Matrix.....:** SOLID

PARAMETER	RESULT	REPORTING LIMIT	UNITS	METHOD
1,2,4-Trichloro-benzene	**19 J**	**250**	**ug/kg**	**SW846 8260B**
1,1,1-Trichloroethane	ND	50	ug/kg	SW846 8260B
1,1,2-Trichloroethane	ND	50	ug/kg	SW846 8260B
Trichloroethene	ND	50	ug/kg	SW846 8260B
Trichlorofluoromethane	ND	100	ug/kg	SW846 8260B
1,1,2-Trichloro-1,2,2-trifluoroethane	ND	250	ug/kg	SW846 8260B
Vinyl chloride	ND	100	ug/kg	SW846 8260B
Xylenes (total)	ND	150	ug/kg	SW846 8260B

SURROGATE	PERCENT RECOVERY	RECOVERY LIMITS
Dibromofluoromethane	89	(59 - 138)
1,2-Dichloroethane-d4	93	(61 - 130)
Toluene-d8	89	(60 - 143)
4-Bromofluorobenzene	71	(47 - 158)

NOTE(S):

Calculations are performed before rounding to avoid round-off errors in calculated results.

J Estimated result. Result is less than RL.

MI0013036

LABORATORY CONTROL SAMPLE DATA REPORT

GC/MS Volatiles

Client Lot #...: A4K050155 **Work Order #...:** GW5LF1AC-LCS **Matrix.....:** SOLID
LCS Lot-Sample#: A4K170000-182 GW5LF1AD-LCSD
Prep Date.....: 11/05/04 **Analysis Date..:** 11/16/04
Prep Batch #...: 4322182
Dilution Factor: 1

PARAMETER	SPIKE AMOUNT	MEASURED AMOUNT	UNITS	PERCENT RECOVERY	RPD	METHOD
Benzene	**200**	**190**	**ug/kg**	**93**		**SW846 8260B**
	200	**180**	**ug/kg**	**90**	**3.7**	**SW846 8260B**
Chlorobenzene	**200**	**180**	**ug/kg**	**92**		**SW846 8260B**
	200	**180**	**ug/kg**	**90**	**3.0**	**SW846 8260B**
1,1-Dichloroethene	**200**	**210**	**ug/kg**	**103**		**SW846 8260B**
	200	**190**	**ug/kg**	**97**	**6.0**	**SW846 8260B**
Toluene	**200**	**190**	**ug/kg**	**96**		**SW846 8260B**
	200	**180**	**ug/kg**	**91**	**5.6**	**SW846 8260B**
Trichloroethene	**200**	**180**	**ug/kg**	**89**		**SW846 8260B**
	200	**180**	**ug/kg**	**89**	**0.71**	**SW846 8260B**

SURROGATE	PERCENT RECOVERY	RECOVERY LIMITS
Dibromofluoromethane	89	(59 - 138)
	83	(59 - 138)
1,2-Dichloroethane-d4	87	(61 - 130)
	88	(61 - 130)
Toluene-d8	91	(60 - 143)
	85	(60 - 143)
4-Bromofluorobenzene	79	(47 - 158)
	80	(47 - 158)

NOTE(S):

Calculations are performed before rounding to avoid round-off errors in calculated results.

Bold print denotes control parameters

MI0013037

LABORATORY CONTROL SAMPLE EVALUATION REPORT

GC/MS Volatiles

Client Lot #...: A4K050155 **Work Order #...:** GW5LF1AC-LCS **Matrix.....:** SOLID
LCS Lot-Sample#: A4K170000-182 GW5LF1AD-LCSD
Prep Date.....: 11/05/04 **Analysis Date..:** 11/16/04
Prep Batch #...: 4322182
Dilution Factor: 1

PARAMETER	PERCENT RECOVERY	RECOVERY LIMITS	RPD	RPD LIMITS	METHOD
Benzene	**93**	**(75 - 129)**			**SW846 8260B**
	90	**(75 - 129)**	**3.7**	**(0-20)**	**SW846 8260B**
Chlorobenzene	**92**	**(75 - 127)**			**SW846 8260B**
	90	**(75 - 127)**	**3.0**	**(0-22)**	**SW846 8260B**
1,1-Dichloroethene	**103**	**(55 - 142)**			**SW846 8260B**
	97	**(55 - 142)**	**6.0**	**(0-27)**	**SW846 8260B**
Toluene	**96**	**(71 - 130)**			**SW846 8260B**
	91	**(71 - 130)**	**5.6**	**(0-24)**	**SW846 8260B**
Trichloroethene	**89**	**(70 - 131)**			**SW846 8260B**
	89	**(70 - 131)**	**0.71**	**(0-23)**	**SW846 8260B**

SURROGATE	PERCENT RECOVERY	RECOVERY LIMITS
Dibromofluoromethane	89	(59 - 138)
	83	(59 - 138)
1,2-Dichloroethane-d4	87	(61 - 130)
	88	(61 - 130)
Toluene-d8	91	(60 - 143)
	85	(60 - 143)
4-Bromofluorobenzene	79	(47 - 158)
	80	(47 - 158)

NOTE(S):

Calculations are performed before rounding to avoid round-off errors in calculated results.

Bold print denotes control parameters

MI0013038

METHOD BLANK REPORT

General Chemistry

Client Lot #...: A4K050155 **Matrix.....:** SOLID

PARAMETER	RESULT	REPORTING LIMIT	UNITS	METHOD	PREPARATION-ANALYSIS DATE	PREP BATCH #
Percent Solids		Work Order #:	GWNNP1AA	MB Lot-Sample #:	A4K100000-502	
	ND	10.0	%	MCAWW 160.3 MOD	11/10-11/11/04	4315502
		Dilution Factor: 1				

NOTE(S):

Calculations are performed before rounding to avoid round-off errors in calculated results.

MI0013039

SAMPLE DUPLICATE EVALUATION REPORT

General Chemistry

Client Lot #...: A4K050155 **Work Order #...:** GWAJN-SMP GWAJN-DUP **Matrix.....:** SOLID

Date Sampled...: 11/01/04 13:15 **Date Received..:** 11/02/04

% Moisture.....: 5.6

PARAM	RESULT	DUPLICATE RESULT	UNITS	RPD	RPD LIMIT	METHOD	PREPARATION-ANALYSIS DATE	PREP BATCH #
Percent Solids						SD Lot-Sample #:	A4K050105-013	
	94.4	94.8	%	0.39	(0-20)	MCAWW 160.3 MOD	11/10-11/11/04	4315502

Dilution Factor: 1

SAMPLE DUPLICATE EVALUATION REPORT

General Chemistry

Client Lot #...: A4K050155 **Work Order #...:** GWAXC-SMP GWAXC-DUP **Matrix.....:** SO

Date Sampled...: 11/04/04 14:30 **Date Received..:** 11/05/04

% Moisture.....: 23

PARAM	RESULT	DUPLICATE RESULT	UNITS	RPD	RPD LIMIT	METHOD	PREPARATION-ANALYSIS DATE	PREP BATCH #
Percent Solids						SD Lot-Sample #:	A4K050155-001	
	77.1	75.8	%	1.7	(0-20)	MCAWW 160.3 MOD	11/10-11/11/04	4315502

Dilution Factor: 1

MI0013041

Cooler: 1 Gray Cooler

Page 1 of 1

CRA
CONESTOGA-ROVERS & ASSOCIATES, INC.
14496 Sheldon Road, Suite 200
Plymouth, MI 48170 • (734) 453-5123

SHIPPED TO (Laboratory Name): STL N Canton

CHAIN OF CUSTODY RECORD

REFERENCE NUMBER: 35298

PROJECT NAME: Eagle Picher

SAMPLER'S SIGNATURE: [signature] PRINTED NAME: Ben Frucher

SEQ. No.	DATE	TIME		SAMPLE TYPE	No. OF CONTAINERS	PARAMETERS: TCL VOCs					Std TAL					REMARKS
1	11-4-04	bit [redacted]	S-35298-110404-BF-036	Soil	2	X					X					
		1430														CRA Contact Paul Wisemann
TOTAL NUMBER OF CONTAINERS					2											

BLF

RELINQUISHED BY: 1. [signature]	DATE: 11-4-04 TIME: 1630	RECEIVED BY: 1. J. Williamson	DATE: 11/5/04 TIME: 955
RELINQUISHED BY: 2.	DATE: TIME:	RECEIVED BY: 2.	DATE: TIME:
RELINQUISHED BY: 3.	DATE: TIME:	RECEIVED BY: 1.	DATE: TIME:

METHOD OF SHIPMENT: FED EX AIR BILL No. 8434 5932 7789

White -Fully Executed Copy Pink -Shipper Copy
Yellow -Receiving Laboratory Copy Goldenrod -Sampler Copy

27813

SAMPLE TEAM: Ben Frucher

RECEIVED FOR LABORATORY BY: J. Williamson
DATE: 11/5/04 TIME: 955

1001 (FORMS)-APRIL 29, 93-REV.0-(C)(F-01)

20

STL North Canton

MI0013042

STL Cooler Receipt Form/Narrative **Lot Number:** A4K050155

North Canton Facility

Client: ERA Project: Eagle Picher Quote#: _____

Cooler Received on: 4/5/04 Opened on: 4/5/04 by: J. Williamson (Signature)

Fedx ☒ Client Drop Off ☐ UPS ☐ DHL ☐ FAS ☐ Other: _____

STL Cooler No# _____ Foam Box ☐ Client Cooler ☒ Other ____

1. Were custody seals on the outside of the cooler? Yes ☐ No ☒ Intact? Yes ☐ No ☐ NA ☒
   If YES, Quantity _____
   Were the custody seals signed and dated? Yes ☐ No ☐ NA ☒
2. Shipper's packing slip attached to this form? Yes ☒ No ☐ NA ☐
3. Did custody papers accompany the samples? Yes ☒ No ☐ Relinquished by client? Yes ☒ No ☐
4. Did you sign the custody papers in the appropriate place? Yes ☒ No ☐
5. Packing material used: Bubble Wrap ☐ Foam ☐ None ☒ Other: _____
6. Cooler temperature upon receipt 4.8 °C (see back of form for multiple coolers/temp)

METHOD: Temp Vial ☐ Coolant & Sample ☐ Against Bottles ☐ IR ☒ ICE/H_2O Slurry ☐

COOLANT: Wet Ice ☒ Blue Ice ☐ Dry Ice ☐ Water ☐ None ☐

7. Did all bottles arrive in good condition (Unbroken)? Yes ☒ No ☐
8. Could all bottle labels and/or tags be reconciled with the COC? Yes ☒ No ☐
9. Were samples at the correct pH? (record below/on back) Yes ☐ No ☐ NA ☒
10. Were correct bottles used for the tests indicated? Yes ☒ No ☐
11. Were air bubbles >6 mm in any VOA vials? Yes ☐ No ☐ NA ☒
12. Sufficient quantity received to perform indicated analyses? Yes ☒ No ☐

Contacted PM _____ Date: _____ by: _____ via Voice Mail ☐ Verbal ☐ Other ☐

Concerning: _____

√	

1. CHAIN OF CUSTODY

The following discrepancies occurred:

_____

2. SAMPLE CONDITION

Sample(s) _____ were received after the recommended holding time had expired.

Sample(s) _____ were received in a broken container.

3. SAMPLE PRESERVATION

Sample(s) _____ were further preserved in sample receiving to meet recommended pH level(s). *Nitric Acid Lot #052804-HNO3; Sulfuric Acid Lot # 011-504-H2SO4; Sodium Hydroxide Lot # -082404-NaOH; Hydrochloric Acid Lot # 100902-HCl; Sodium Hydroxide and Zinc Acetate Lot # 071604-CH3COO2ZN/NaOH*

Sample(s) _____ were received with bubble > 6 mm in diameter (cc: PM)

4. Other (see below or back)

Client ID	pH	Date	Initials

SOP: NC-SC-0005, Sample Receiving
N:\QAQC\NARRATIV\STL\Cooler Receipt STL\COOLER STL Rev43 092204.doc

MI0013043

STL Cooler Receipt Form/Narrative
North Canton Facility

Client ID	pH	Date	Initials

Cooler	Temp	Method	Coolant

Discrepancies Cont.

END OF REPORT

CONESTOGA-ROVERS
& ASSOCIATES

14496 Sheldon Road, Suite 200, Plymouth, Michigan 48170
Telephone: 734-453-5123 Facsimile: 734-453-5201
www.CRAworld.com

February 14, 2006 Reference No. 35298

Mr. Doug Rommeck
EaglePicher Automotive
2424 John Daly Road
Inkster, Michigan 48141

Dear Mr. Rommeck:

Re: Groundwater Performance Monitoring
January 2006 Event
EaglePicher Automotive
Wolverine Gasket Division
2638 Princess Street
Inkster, Michigan

Conestoga-Rovers & Associates, Inc. (CRA) was contracted by the Wolverine Gasket Division of EaglePicher Automotive to provide remediation services for the property located at 2638 Princess Street in Inkster, Michigan (Site). These activities are being performed by Wolverine Gasket on a voluntary basis. This document summarizes the remediation activities that took place in September 2005 and the analytical results from the groundwater performance monitoring conducted in January of 2006. At Site plan is shown on Figure 1.

SCOPE OF WORK

CRA performed a bench scale treatability study in the Spring of 2004, the results of which were presented in the Pre-Design Field Investigation and Treatability Study dated August 11, 2004, revised December 15, 2005. This study concluded that Fenton's Reagent (5% H_2O_2 and a 5% solution of ferrous sulfate) would be most effective in areas where the total VOC concentration in the groundwater exceeds 10,000 µg/L. Furthermore, the study concluded that a 2% hydrogen peroxide solution would be sufficient to treat the groundwater that did not meet or exceed total VOC concentrations of 10,000 micrograms per liter (µg/L). These criteria were used as a guide during the injections performed through the temporary injection wells.

First Round of Injections

Phase I

On October 27 and 28, 2004 approximately 600 gallons of 2% hydrogen peroxide (H_2O_2) were injected into the open excavation created during the removal of the soil pile. The application was applied in three 200-gallon batches. Upon completion of the final 200 gallon application on October 28, 2004 the excavation was backfilled.

Phase II

Seventy-seven temporary injection points were installed between November 1, 2004 and November 5, 2004. The injection points were typically installed to a depth of 6 feet bgs. These injection points were constructed with 1-inch diameter PVC equipped with 5-foot long 0.010-inch machine slotted screens. A #5 silica sand was used for the sandpack. Bentonite chip was used to seal the surface. The temporary injection points were capped with 1-inch locking J-plug caps. Injection points that were outside and off the driveway areas were installed with 3-foot stick-up risers. The risers were flagged with bright-orange flagging for high visibility. The other injection points were constructed with flush mounted manhole covers or steel plates that were bolted to the ground. These manhole covers and steel plates were installed to protect the wells between injection events.

The first round of injections was conducted between November 5 and November 10, 2004. Thirty-three of the 77 temporary injection points were injected with 2% H_2O_2. These locations were along the outer perimeter of the volatile organic compound (VOC) impacted groundwater where concentrations of total VOC's were estimated to be below 10,000 μg/L. Fenton's Reagent (5% H_2O_2 and 5% ferrous sulfate) was used at the remaining 44 temporary injection locations where the concentration of total VOC's was estimated to be over 10,000 μg/L.

Fluids were injected into the former nutrient injection system (injection trench) upon completion of the injections into the temporary injection points. Approximately 400 gallons of Fenton's Reagent were pumped into the former injection trench. Additionally, approximately 600 gallons of 2% H_2O_2 were injected into the former groundwater collection pipe (recovery trench).

Second Round of Injections

The second round of injections was conducted between September 21 and September 23, 2005. Forty-one temporary injection points were injected with 2% H_2O_2. These locations were along the outer perimeter of the volatile organic compound (VOC) impacted groundwater where concentrations of total VOC's were estimated to be below 10,000 μg/L. Fenton's Reagent (5% H_2O_2 and 5% ferrous sulfate) was used at an additional 32 temporary injection locations and monitoring wells MW101-05 and MW102-05 where the concentration of total VOC's was estimated to be over 10,000 μg/L.

Fluids were injected into the former nutrient injection system (injection trench) upon completion of the injections into the temporary injection points. Approximately 10 gallons of Fenton's Reagent were pumped into the former injection trench. Additionally, approximately 600 gallons of 2% H_2O_2 were injected into the former groundwater collection pipe (recovery trench).

Groundwater Performance Monitoring

On January 16, 2006 groundwater was collected from a total of eleven locations across the site (MW-1, MW-2, MW-3, MW-6, MW-7, MW-8, MW-9, MW0-01, MW0-02, MW0-03 and MW102-05). Figure 2 displays the locations of the monitoring wells. Groundwater levels were measure and recorded using an electronic depth to water meter, from the top of each riser. Recorded water levels are presented in Table 1. Prior to groundwater sample collection, each monitoring well was purged in accordance with low-flow protocols. Field analyses of the purge water consisted of pH, conductivity, temperature, turbidity, dissolved oxygen, and oxidation-reduction potential. These field parameters were monitored during purging to ensure stabilization of the groundwater within each monitoring well prior to sampling. A summary of the groundwater stabilization parameters is shown on Table 2. Upon obtaining stabilization, the groundwater samples were collected in accordance with low-flow protocols.

Severn Trent Laboratory (STL) analyzed the groundwater samples for TCL VOCs using U.S. E.P.A. Method 8260B.

PERFORMANCE MONITORING RESULTS

Groundwater

The results of the groundwater performance monitoring, January 2006 are presented in Table 3. These results are compared against historical groundwater sampling results. Additionally, Figures 4 through 9 provide a trend analysis for the wells that have been sampled numerous times. A review of Table 3 and Figures 4 through 9 indicate that the January 2006 post-injection VOC concentrations were significantly lower than pre-injection concentrations with the exception of MW-8.

In January 2006 the groundwater flow direction was towards the north-northeast (Figure 3). No groundwater divide was present during the January monitoring event (a groundwater divide has been observed during times with low water levels as was present in September 2005). This northerly groundwater flow is consistent with historical observations when water levels are generally high (June 2004 and February 2005).

SUMMARY

Concentrations of benzene, toluene, ethylbenzene, total xylene, and chlorobenzene at the Site have decreased significantly when compared to pre-injection concentrations. The next round of performance monitoring is scheduled for July 2006.

Yours truly,

CONESTOGA-ROVERS & ASSOCIATES

Thomas M. Kinney, C.P.G.

MMD/eb/10/Det.
Enclosures:

Figures

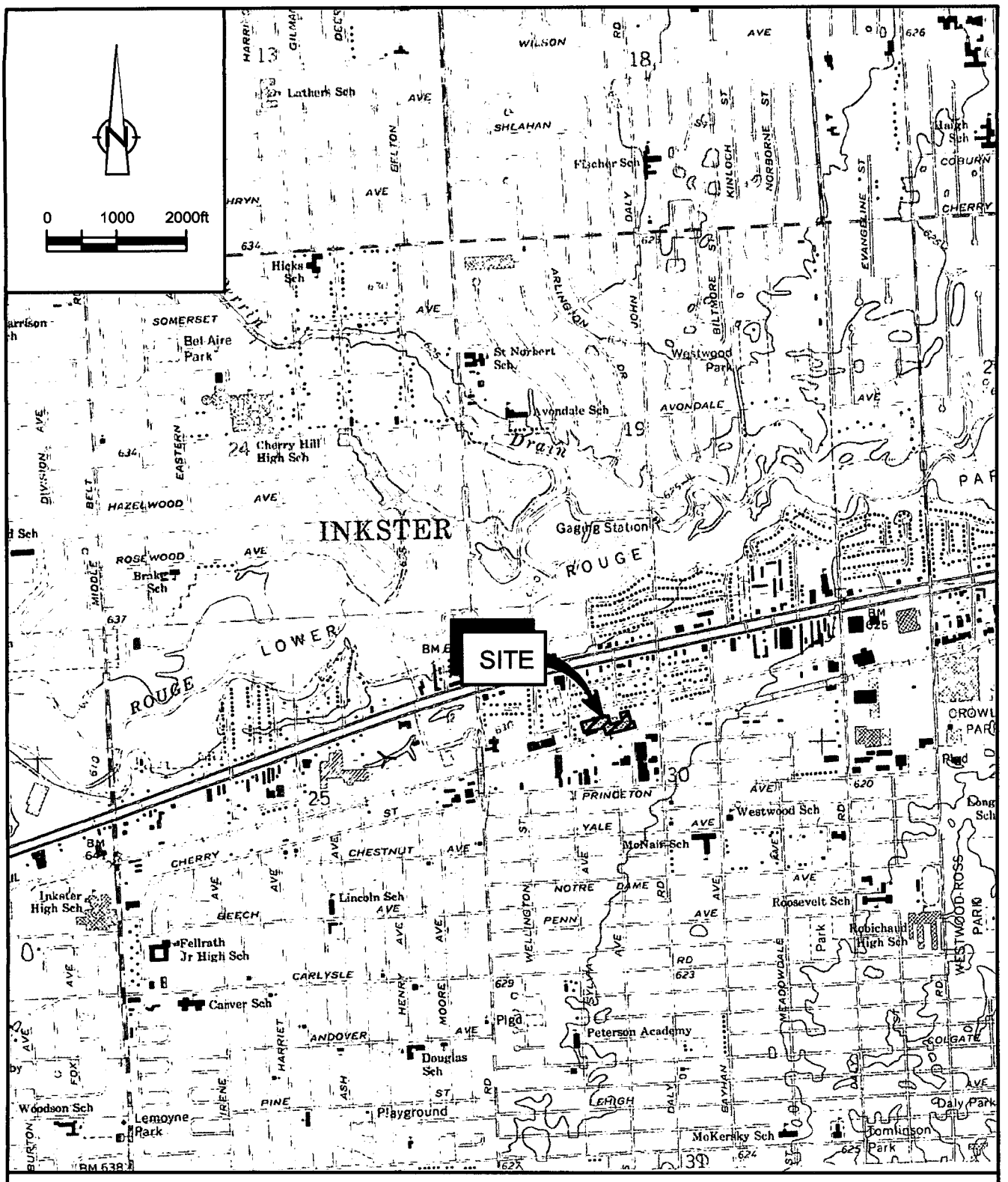
Figure 1	Site Location
Figure 2	Site Plan
Figure 3	Groundwater Contour Map, January 2006
Figure 4	Trend Analysis MW-1
Figure 5	Trend Analysis MW-2
Figure 6	Trend Analysis MW-3
Figure 7	Trend Analysis MW-7
Figure 8	Trend Analysis MW-8
Figure 9	Trend Analysis MW-9

Tables

Table 1	Groundwater Elevation Data
Table 2	Field Measured Groundwater Quality Parameters
Table 3	Groundwater Performance Monitoring Results

Appendices

Appendix A	January 2006 Analytical Results



SOURCE: USGS QUADRANGLE MAP;
INKSTER, MICHIGAN

figure 1

SITE LOCATION
EAGLEPICHER - WOLVERINE GASKET
Inkster, Michigan

35298-00(ROMM010)GN-DE002 FEB 07/2006

MI0013050

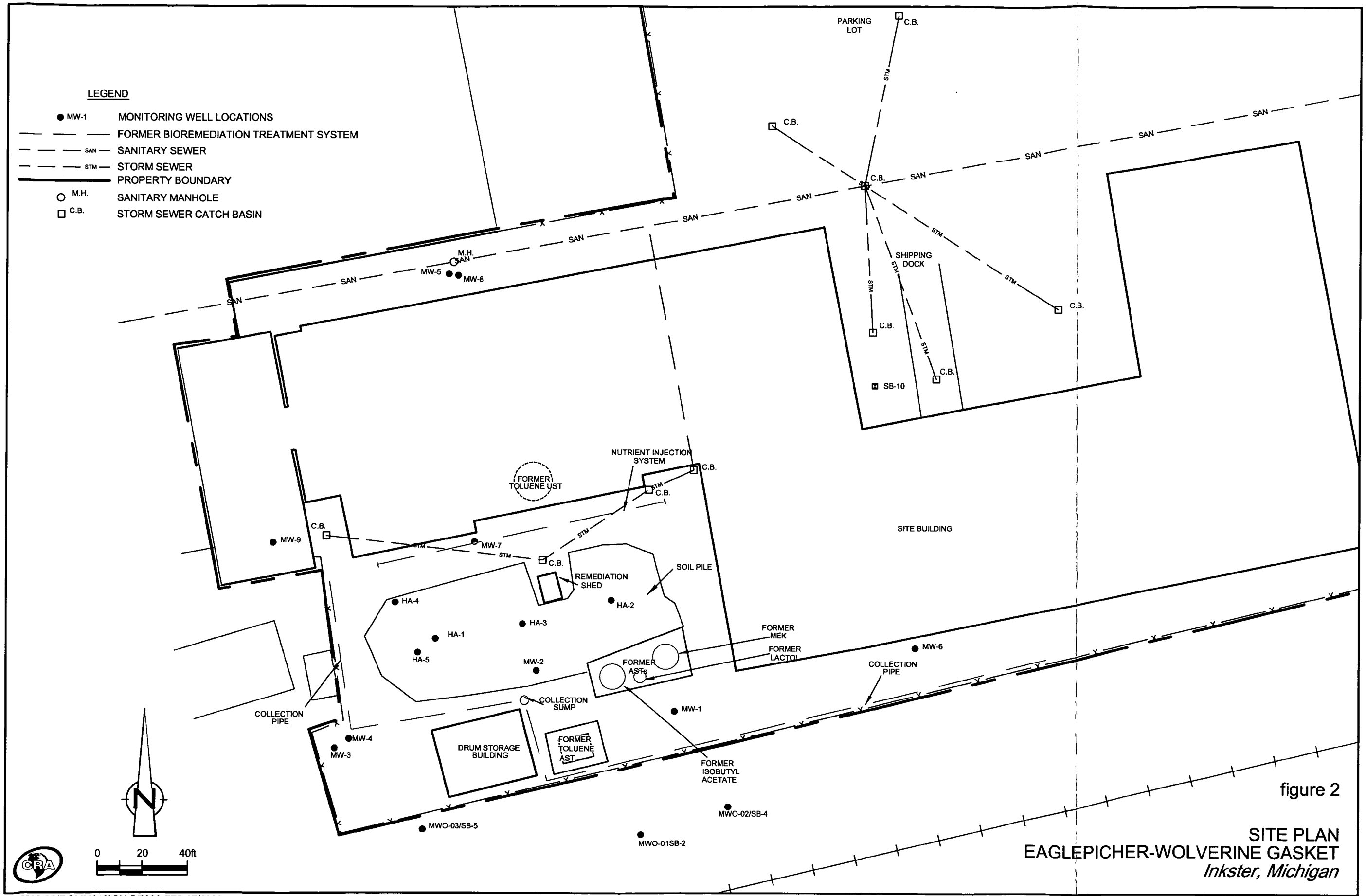


figure 2

SITE PLAN
EAGLEPICHER-WOLVERINE GASKET
Inkster, Michigan

35298-00(ROMM010)GN-DE003 FEB 07/2006

MI0013051

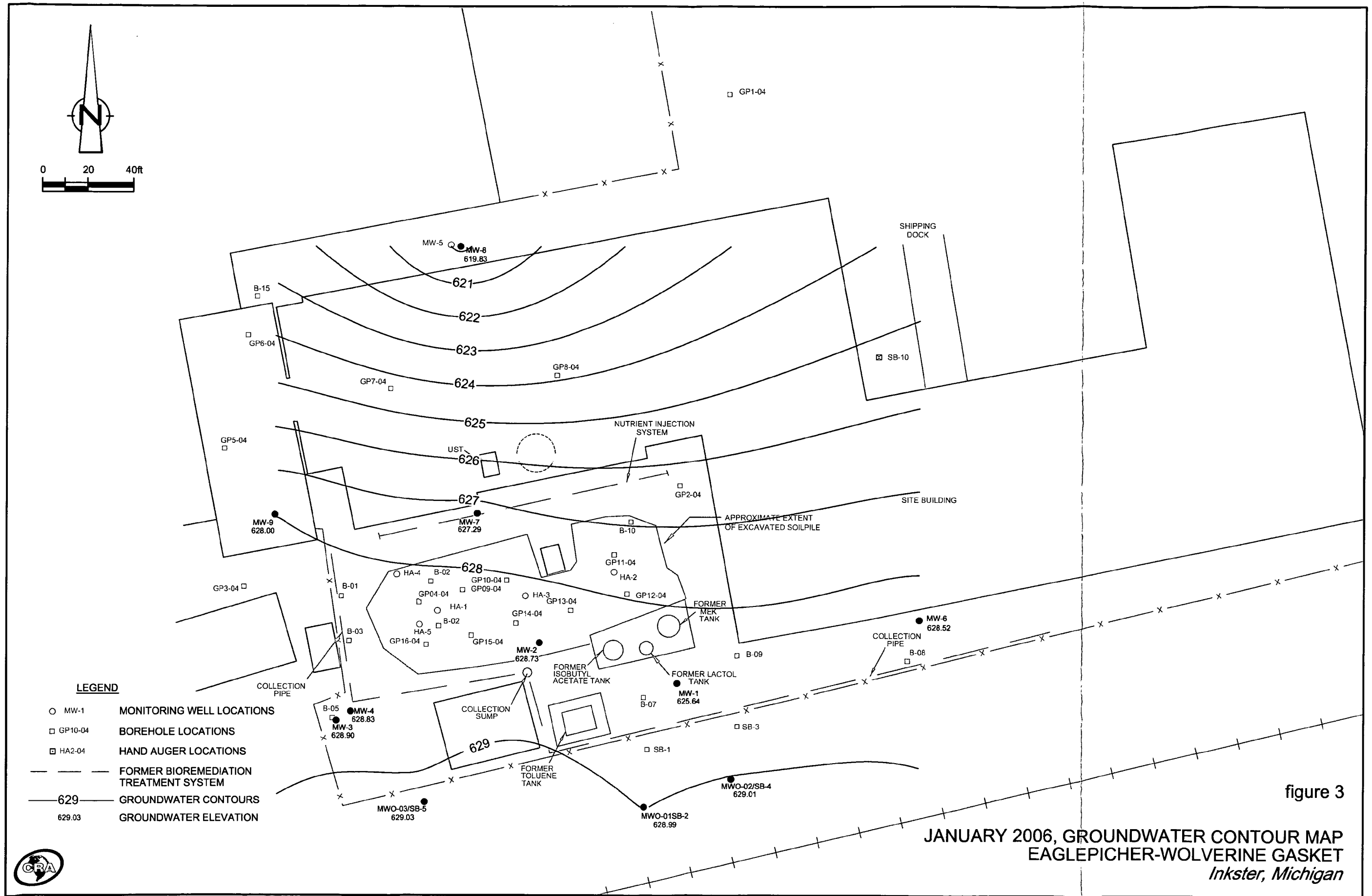


figure 3

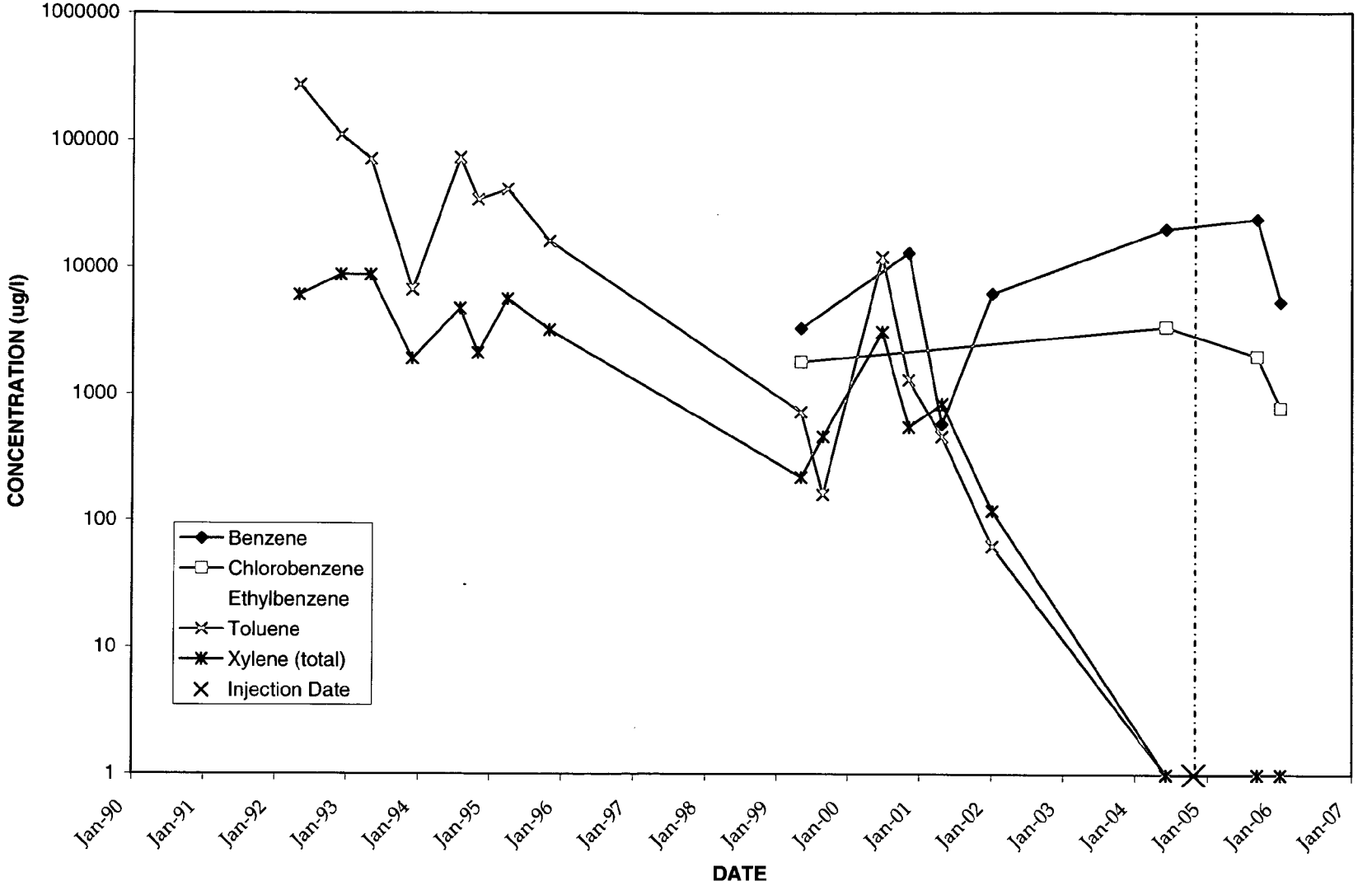
JANUARY 2006, GROUNDWATER CONTOUR MAP
EAGLEPICHER-WOLVERINE GASKET
Inkster, Michigan

35298-00(ROMM010)GN-DE001 FEB 07/2006

MI0013052

FIGURE 4

TREND ANALYSIS
MW-1
EAGLEPICHER - WOLVERINE GASKET
INKSTER, MICHIGAN

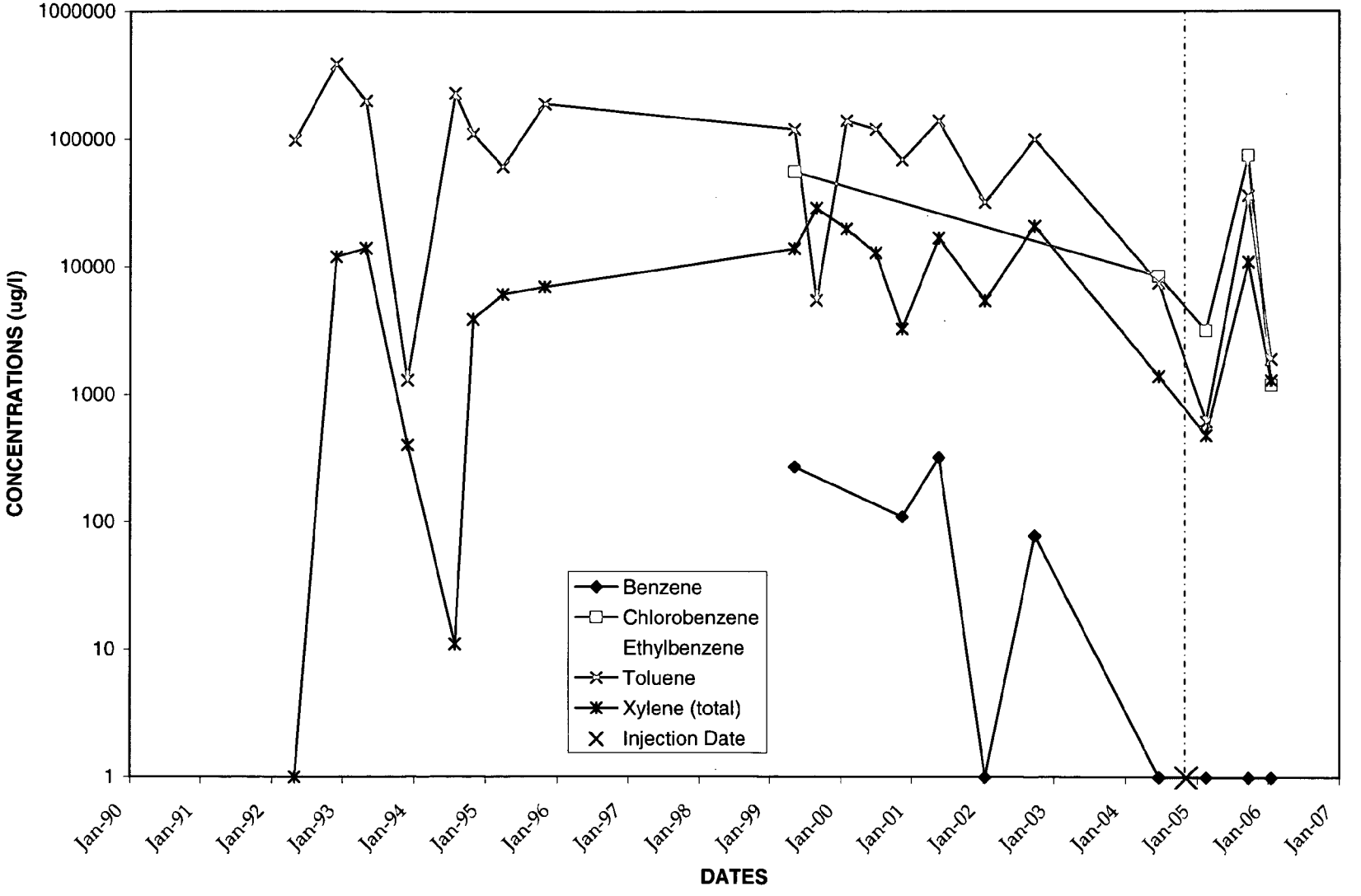


CRA 35298Rommeck-10-F4D

MI0013053

FIGURE 5

TREND ANALYSIS
MW-2
EAGLEPICHER - WOLVERINE GASKET
INKSTER, MICHIGAN

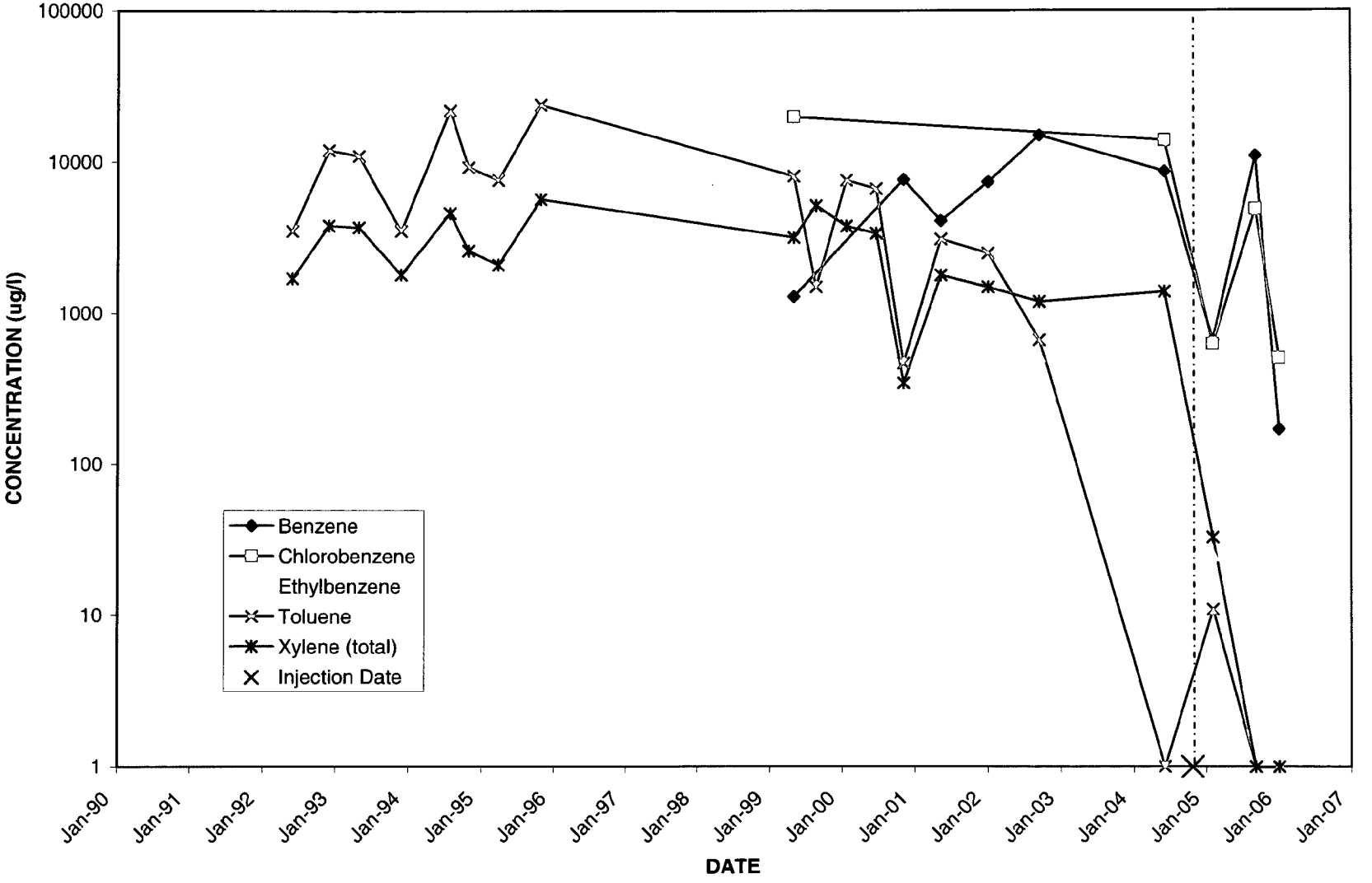


CRA 35298Rommeck-10-F5D

MI0013054

FIGURE 6

TREND ANALYSIS
MW-3
EAGLEPICHER - WOLVERINE GASKET
INKSTER, MICHIGAN

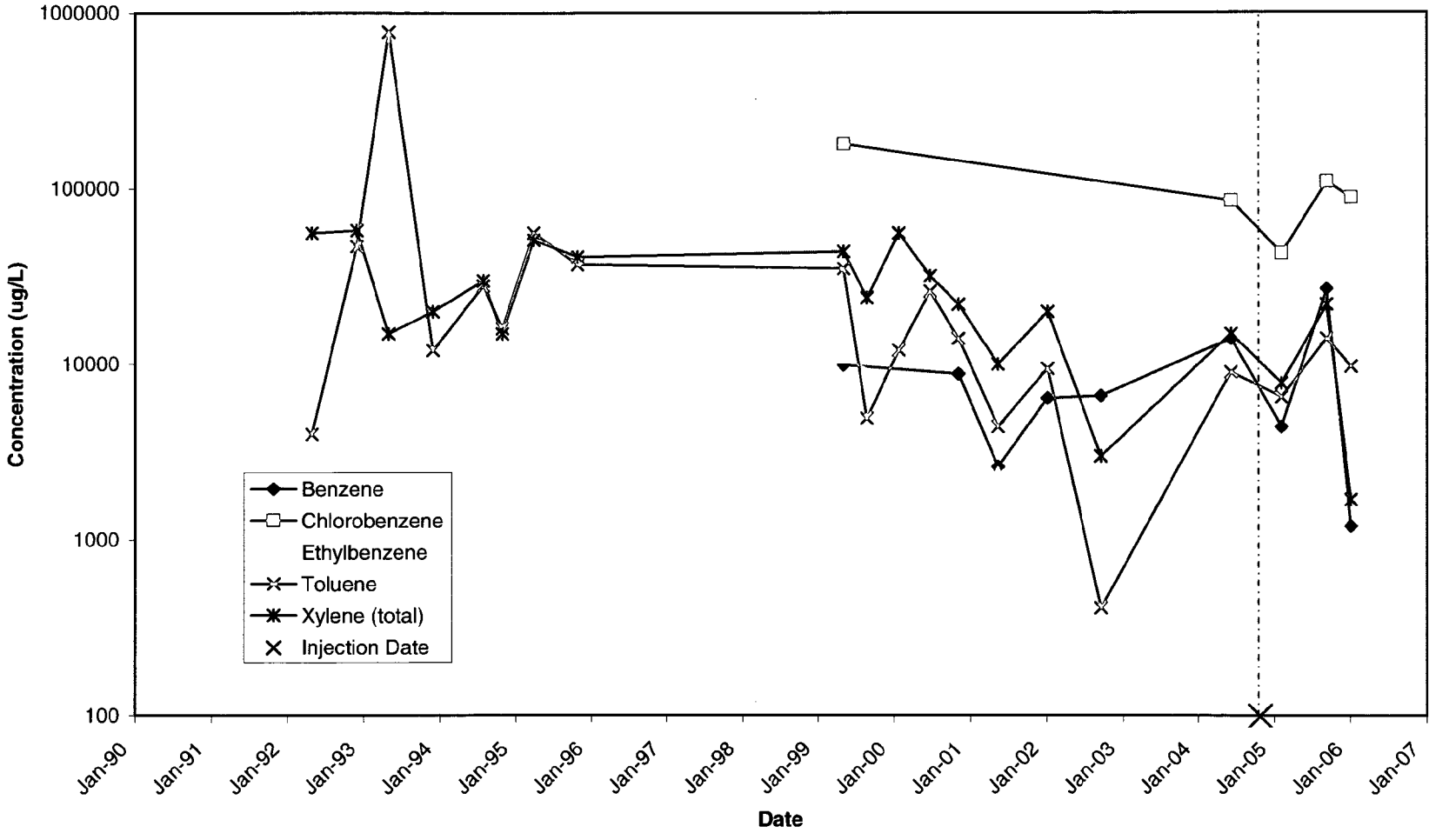


CRA 35298Rommeck-10-F6D

MI0013055

FIGURE 7

TREND ANALYSIS
MW-7
EAGLEPICHER - WOLVERINE GASKET
INKSTER, MICHIGAN

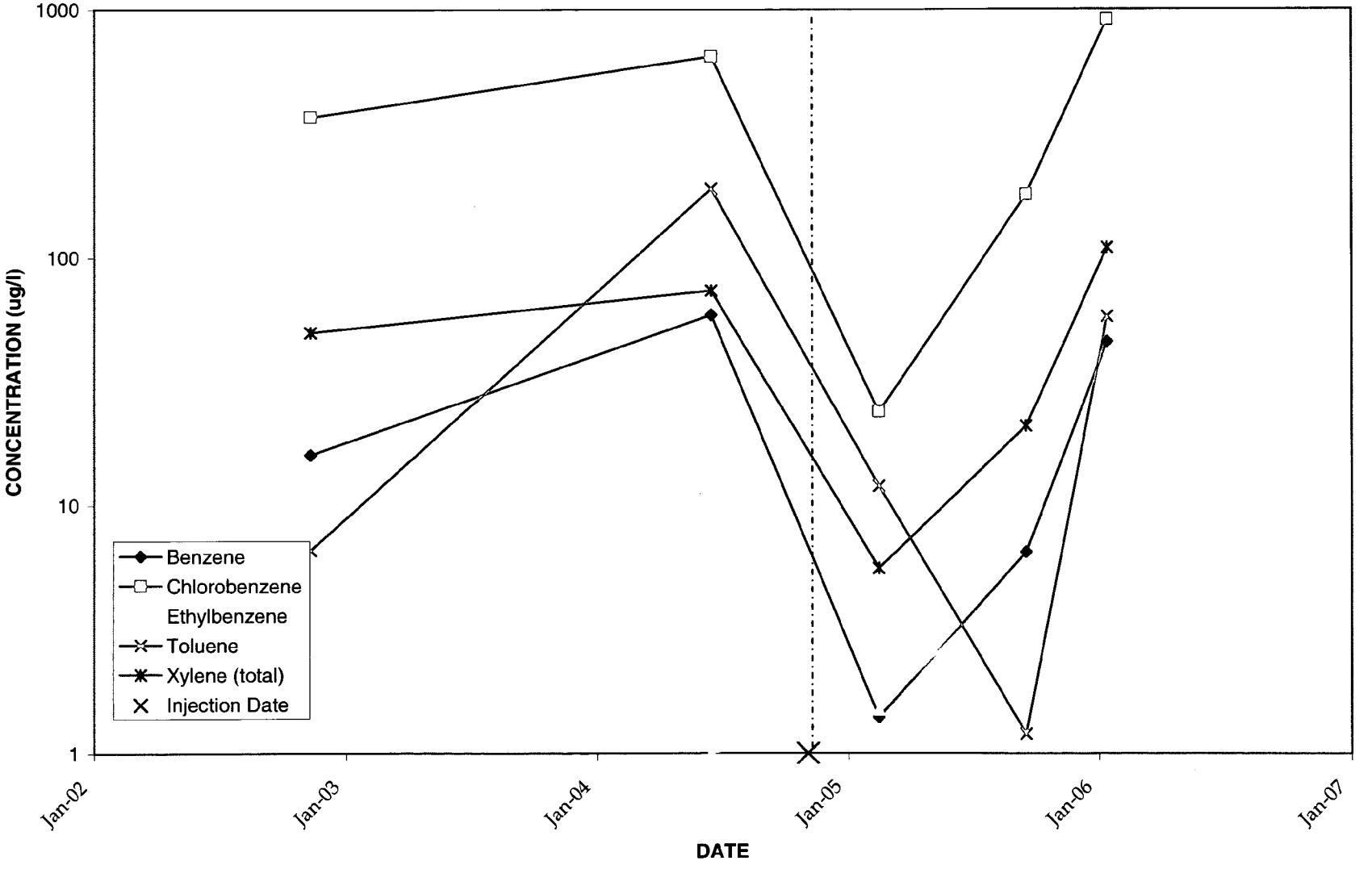


CRA 35298Rommeck-10-F7D

MI0013056

FIGURE 8

TREND ANALYSIS
MW-8
EAGLEPICHER - WOLVERINE GASKET
INKSTER, MICHIGAN

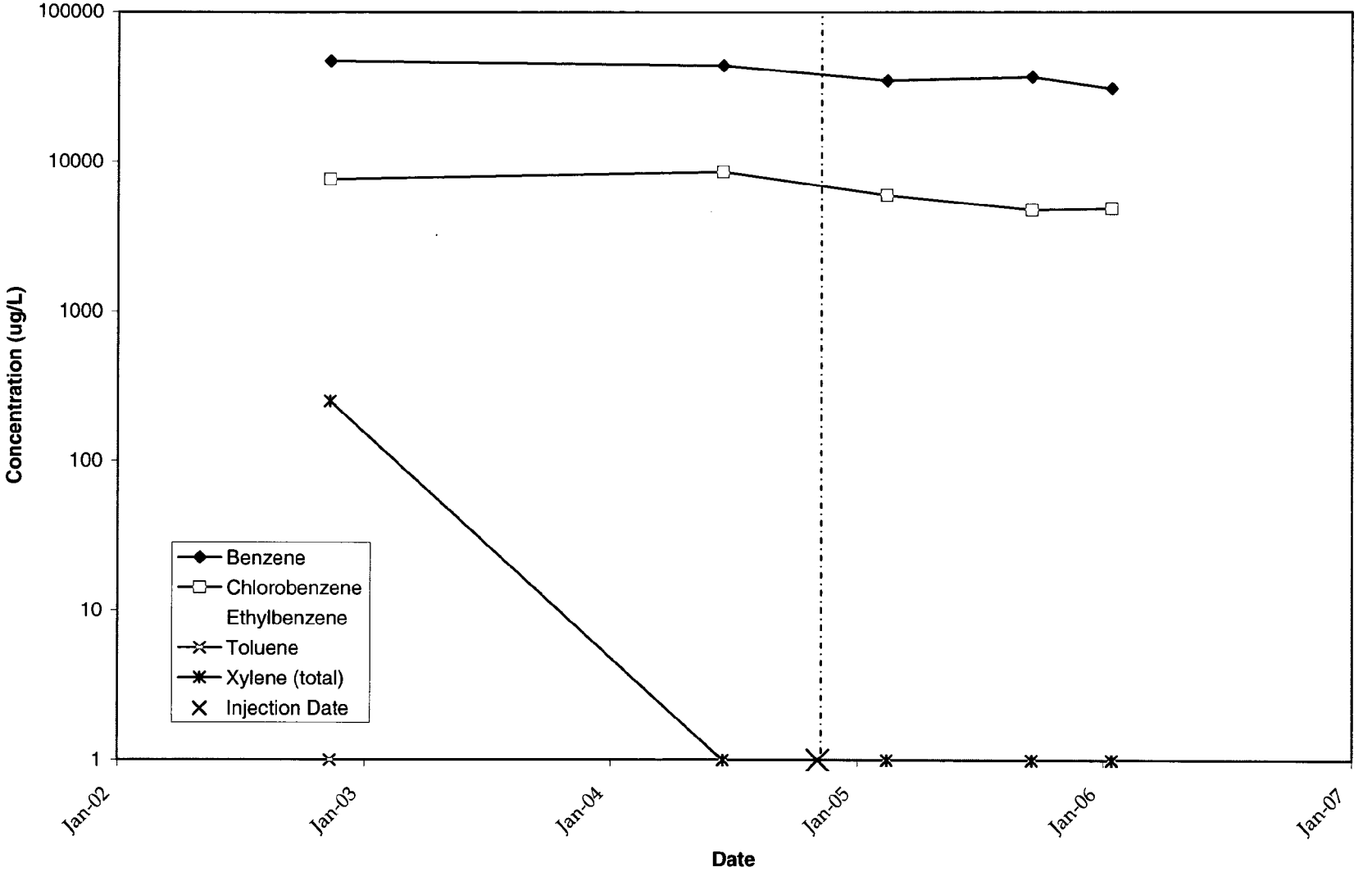


CRA 35298Rommeck-10-F8D

MI0013057

FIGURE 9

TREND ANALYSIS
MW-9
EAGLEPICHER - WOLVERINE GASKET
INKSTER, MICHIGAN



CRA 35298Rommeck-10-F9D

MI0013058

TABLE 1

GROUNDWATER ELEVATION DATA
EAGLEPICHER - WOLVERINE GASKET
INKSTER, MICHIGAN

MW I.D.	Northing	Easting	T.O.C.	P/Casing	Ground	Depth to Water 1/16/06 (ft. BTOC)	Groundwater Elevation 1/16/06 (ft. AMSL)
MW-1	290556.81	13411125.01	628.70	628.88	629.24	0.07	628.63
MW-2	290574.66	13411064.40	631.78	631.91	630.37	3.05	628.73
MW-3	290540.37	13410975.38	631.63	631.83	629.83	2.73	628.90
MW-4	290544.46	13410981.75	631.62	631.95	629.88	2.79	628.83
MW-5	290749.98	13411025.13	629.64	630.07	627.61	23.25	606.39
MW-6	290584.76	13411231.08	629.44	629.64	629.61	0.92	628.52
MW-7	290631.69	13411037.00	628.77	629.05	629.13	1.48	627.29
MW-8	290749.33	13411029.29	627.52	627.92	627.74	7.69	619.83
MW-9	290631.12	13410948.22	629.04	629.23	629.24	1.04	628.00
MWO-01	290502.62	13411110.64	632.29	632.45	630.67	3.30	628.99
MWO-02	290514.86	13411148.88	631.66	631.73	629.80	2.65	629.01
MWO-03	290504.74	13411014.30	632.13	632.23	630.27	3.10	629.03

Note:
1. Horizontal reference system is NAD83 SPCS 2113 MI South Zone in US survey feet.
2. Vertical reference system is NAVD 88 in US survey feet.
3. Surveyed by CRA, June 2004.
MW - Monitoring Well

MI0013059

TABLE 2
FIELD MEASURED GROUNDWATER QUALITY PARAMETERS
JANUARY 16, 2006
EAGLEPICHER - WOLVERINE GASKET
INKSTER, MICHIGAN

Location	*Temperature (deg. C)*	*Specific Conductivity (mS/cm)*	*pH (units)*	*DO (mg/L)*	*ORP (mV)*	*Turbidity (NTU)*
MW0-01	5.7	1.014	7.10	2.86	230	7.09
MW0-02	5.9	0.919	6.92	0.23	-96	6.85
MW0-03	6.7	0.459	7.08	7.73	228	3.21
MW102-05	22.5	1.940	6.33	0.57	-101	29.00
MW-1	5.8	0.466	7.17	0.44	124	19.80
MW-2	6.5	1.129	6.92	0.43	-41	22.90
MW-3	4.9	0.513	7.15	0.55	-112	5.32
MW-6	6.4	0.461	7.52	2.66	200	3.34
MW-7	7.7	0.709	7.13	0.28	-174	3.33
MW-8	8.9	1.570	7.59	3.70	-102	6.45
MW-9	17.0	0.807	7.09	0.15	-159	6.73

MI0013060

TABLE 3
GROUNDWATER PERFORMANCE MONITORING RESULTS
EAGLEPICHER - WOLVERINE GASKET
INKSTER, MICHIGAN

Well	*Date*		*Acetone*	*2-Butanone(MEK)*	*Benzene*	*Toluene*	*Ethylbenzene*	*Xylene (total)*	*Chlorobenzene*
MW-1	June 18, 2004	µg/L	ND	ND	20,000	ND	ND	ND	3,400
MW-1	September 20, 2005	µg/L	ND	ND	24,000	ND	ND	ND	2,000
MW-1	**January 16, 2006**	µg/L	**290 J,B**	**ND**	**5,300**	**ND**	**ND**	**ND**	**780**
MW-2	June 18, 2004	µg/L	ND	ND	ND	7,500	370	1,400	8,500
MW-2	February 16, 2005	µg/L	130J	ND	ND	610	160	480	3,200
MW-2	September 20, 2005	µg/L	ND	ND	ND	36,000	2,800	11,000	75,000
MW-2	**January 16, 2006**	µg/L	**700 J,B**	**ND**	**ND**	**1,900**	**530**	**1,300**	**12,000**
MW-3	June 17, 2004	µg/L	ND	ND	8,700	ND	620	1,400	14,000
MW-3	February 16, 2005	µg/L	27 J	ND	670	11 J	25	33 J	630
MW-3	September 20, 2005	µg/L	ND	ND	11,000	ND	97 J	ND	4,900
MW-3	**January 16, 2006**	µg/L	**45 J,B**	**ND**	**170**	**ND**	**ND**	**ND**	**510**
MW-6	June 17, 2004	µg/L	ND	ND	ND	ND	ND	ND	6.1
MW-6	**January 16, 2006**	µg/L	**ND**	**ND**	**43 J**	**ND**	**ND**	**ND**	**ND**
MW-7	June 18, 2004	µg/L	ND	ND	14,000	9,000	4,200	15,000	86,000
MW-7	February 16, 2005	µg/L	ND	ND	4,400	6,500	2,000	7,500	43,000
MW-7	September 20, 2005	µg/L	ND	ND	27,000	14,000	5,300	22,000	110,000
MW-7	**January 16, 2006**	µg/L	**4,700 J,B**	**ND**	**12,000**	**9,700**	**4,700**	**17,000**	**89,000**
MW-8	June 18, 2004	µg/L	ND	ND	59	190	ND	74	650
MW-8	February 16, 2005	µg/L	5.9 J	ND	1	12	2	6	24
MW-8	September 20, 2005	µg/L	170	6.4 J	7	1.2 J	6	21	180
MW-8	**January 16, 2006**	µg/L	**55 J,B**	**15 J**	**46**	**58**	**29**	**110**	**910**
MW-9	June 17, 2004	µg/L	ND	ND	44,000	ND	ND	ND	8,600
MW-9	February 16, 2005	µg/L	1,300 J	ND	35,000	ND	ND	ND	6,000
MW-9	September 20, 2005	µg/L	ND	ND	37,000	ND	ND	ND	4,800
MW-9	**January 16, 2006**	µg/L	**1,900 J,B**	**ND**	**31,000**	**ND**	**ND**	**ND**	**4,900**
MW0-01	June 17, 2004	µg/L	ND	ND	ND	ND	ND	ND	6
MW0-01	September 20, 2005	µg/L	ND	ND	ND	ND	ND	ND	0.36 J
MW0-01	**January 16, 2006**	µg/L	**ND**	**ND**	**ND**	**ND**	**ND**	**ND**	**ND**
MW0-02	June 17, 2004	µg/L	ND	ND	ND	ND	ND	ND	42
MW0-02	September 20, 2005	µg/L	ND	ND	ND	3.7 J	6.0 J	ND	800
MW0-02	**January 16, 2006**	µg/L	**28 J,B**	**ND**	**10 J**	**ND**	**ND**	**ND**	**510**
MW0-03	June 17, 2004	µg/L	ND	ND	ND	ND	ND	ND	ND
MW0-03	September 20, 2005	µg/L	ND	ND	ND	ND	ND	ND	0.21 J
MW0-03	**January 16, 2006**	µg/L	**0.91 J,B**	**ND**	**ND**	**ND**	**ND**	**ND**	**ND**
MW102-05	September 19, 2005	µg/L	ND	41,000	6,700	15,000	5,500	23,000	160,000
MW102-05	**January 16, 2006**	µg/L	**10,000 J,B**	**17,000 J**	**41,000**	**6,800**	**4,700 J**	**19,000**	**110,000**

µg/L = micrograms per liter

J = Estimated Result. Result is less than Report Limit.

B= Detected in Method Blanks.

November 5, 2004 - November 10, 2004: Injections of Fenton's Reagent in highly impacted areas and hydrogen peroxide in less impacted areas

September 13, 2005 - Utilizing a vacuum truck, vacuum water and vapors from MW-7, MW-9, and several injection wells (<100 gallons total volume)

September 21 - September 23, 2005: Injections of Fenton's Reagent in highly impacted areas and hydrogen peroxide in less impacted areas

January 16, 2006- Most recent sampling event.

APPENDIX A

JANUARY 2006 ANALYTICAL RESULTS

MI0013062

Table of Contents

Analytical Report Cover Page #A6A170248 ..... **1**
Case Narrative 2
Executive Summary 6
Analytical Method Summary 8
Sample Summary 9
Analytical Results by Sample 10
Quality Control Section 34
Miscellaneous Data 51

Total # of Pages in this Document **54**

Return to Navigator

SEVERN TRENT STL

STL North Canton
4101 Shuffel Drive NW
North Canton, OH 44720

Tel: 330 497 9396 Fax: 330 497 0772
www.stl-inc.com

ANALYTICAL REPORT

PROJECT NO. 35298

EAGLE PITCHER

Lot #: A6A170248

Paul Wiseman (PM)

Conestoga Rovers & Assoc., Inc
14496 Sheldon Rd Suite 200
Plymouth, MI 48170

SEVERN TRENT LABORATORIES, INC.

Denise D. Heckler
Project Manager

January 24, 2006

CASE NARRATIVE

A6A170248

The following report contains the analytical results for eleven water samples and one quality control sample submitted to STL North Canton by Conestoga-Rovers & Associates, Inc. from the Eagle Pitcher Site, project number 35298. The samples were received January 17, 2006, according to documented sample acceptance procedures.

STL utilizes USEPA approved methods in all analytical work. The samples presented in this report were analyzed for the parameter(s) listed on the analytical methods summary page in accordance with the method(s) indicated. Preliminary results were provided to Denise Heckler on January 23, 2006. A summary of QC data for these analyses is included at the back of the report.

STL North Canton attests to the validity of the laboratory data generated by STL facilities reported herein. All analyses performed by STL facilities were done using established laboratory SOPs that incorporate QA/QC procedures described in the applicable methods. STL's operations groups have reviewed the data for compliance with the laboratory QA/QC plan, and data have been found to be compliant with laboratory protocols unless otherwise noted below.

The test results in this report meet all NELAP requirements for parameters for which accreditation is required or available. Any exceptions to NELAP requirements are noted in this report. Pursuant to NELAP, this report may not be reproduced, except in full, without the written approval of the laboratory.

If you have any questions, please call the Project Manager, Denise D. Heckler, at 734-205-2535.

This report is sequentially paginated. The final page of the report is labeled as "END OF REPORT." The total number of pages in this report is 54.

SUPPLEMENTAL QC INFORMATION

SAMPLE RECEIVING

The temperature of the cooler upon sample receipt was 2.4°C.

CASE NARRATIVE(continued)

GC/MS VOLATILES

The sample(s) that contained concentrations of target analyte(s) at a reportable level in the associated Method Blank(s) were flagged with "B". All target analytes in the Method Blank must be below the reporting limit (RL) or the associated sample(s) must be ND with the exception of common laboratory contaminants.

The sample(s) that contain results between the MDL and the RL were flagged with "J". There is a possibility of false positive or mis-identification at these quantitation levels. In analytical methods requiring confirmation of the analyte reported, confirmation was performed only down to the standard reporting limit (SRL). The acceptance criteria for QC samples may not be met at these quantitation levels.

MI0013066

QUALITY CONTROL ELEMENTS OF SW-846 METHODS

STL North Canton conducts a quality assurance/quality control (QA/QC) program designed to provide scientifically valid and legally defensible data. Toward this end, several types of quality control indicators are incorporated into the QA/QC program, which is described in detail in QA Policy, QA-003. These indicators are introduced into the sample testing process to provide a mechanism for the assessment of the analytical data.

QC BATCH

Environmental samples are taken through the testing process in groups called QUALITY CONTROL BATCHES (QC batches). A QC batch contains up to twenty environmental samples of a similar matrix (water, soil) that are processed using the same reagents and standards. STL North Canton requires that each environmental sample be associated with a QC batch.

Several quality control samples are included in each QC batch and are processed identically to the twenty environmental samples. These QC samples include a METHOD BLANK (MB), a LABORATORY CONTROL SAMPLE (LCS) and, where appropriate, a MATRIX SPIKE/MATRIX SPIKE DUPLICATE (MS/MSD) pair or a MATRIX SPIKE/SAMPLE DUPLICATE (MS/DU) pair. If there is insufficient sample to perform an MS/MSD or an MS/DU, then a LABORATORY CONTROL SAMPLE DUPLICATE (LCSD) is included in the QC batch.

LABORATORY CONTROL SAMPLE

The Laboratory Control Sample is a QC sample that is created by adding known concentrations of a full or partial set of target analytes to a matrix similar to that of the environmental samples in the QC batch. The LCS analyte recovery results are used to monitor the analytical process and provide evidence that the laboratory is performing the method within acceptable guidelines. All control analytes indicated by a bold type in the LCS must meet acceptance criteria. Failure to meet the established recovery guidelines requires the repreparation and reanalysis of all samples in the QC batch. The only exception is that if the LCS recoveries are biased high and the associated sample is ND (non-detected) for the parameter(s) of interest, the batch is acceptable.

At times, a Laboratory Control Sample Duplicate (LCSD) is also included in the QC batch. An LCSD is a QC sample that is created and handled identically to the LCS. Analyte recovery data from the LCSD is assessed in the same way as that of the LCS. The LCSD recoveries, together with the LCS recoveries, are used to determine the reproducibility (precision) of the analytical system. Precision data are expressed as relative percent differences (RPDs). If the RPD fails for an LCS/LCSD and yet the recoveries are within acceptance criteria, the batch is still acceptable.

METHOD BLANK

The Method Blank is a QC sample consisting of all the reagents used in analyzing the environmental samples contained in the QC batch. Method Blank results are used to determine if interference or contamination in the analytical system could lead to the reporting of false positive data or elevated analyte concentrations. All target analytes must be below the reporting limits (RL) or the associated sample(s) must be ND except under the following circumstances:

- Common organic contaminants may be present at concentrations up to 5 times the reporting limits. Common metals contaminants may be present at concentrations up to 2 times the reporting limit, or the reported blank concentration must be twenty fold less than the concentration reported in the associated environmental samples. (See common laboratory contaminants listed below.)

Volatile (GC or GC/MS)	Semivolatile (GC/MS)	Metals
Methylene chloride	Phthalate Esters	Copper
Acetone		Iron
2-Butanone		Zinc
		Lead*

- *for analyses run on TJA Trace ICP, ICPMS or GFAA only*

QUALITY CONTROL ELEMENTS OF SW-846 METHODS
(Continued)

- Organic blanks will be accepted if compounds detected in the blank are present in the associated samples at levels 10 times the blank level. Inorganic blanks will be accepted if elements detected in the blank are present in the associated samples at 20 times the blank level.

- Blanks will be accepted if the compounds/elements detected are not present in any of the associated environmental samples.

Failure to meet these Method Blank criteria requires the repreparation and reanalysis of all samples in the QC batch.

MATRIX SPIKE/MATRIX SPIKE DUPLICATE

A Matrix Spike and a Matrix Spike Duplicate are a pair of environmental samples to which known concentrations of a full or partial set of target analytes are added. The MS/MSD results are determined in the same manner as the results of the environmental sample used to prepare the MS/MSD. The analyte recoveries and the relative percent differences (RPDs) of the recoveries are calculated and used to evaluate the effect of the sample matrix on the analytical results. Due to the potential variability of the matrix of each sample, the MS/MSD results may not have an immediate bearing on any samples except the one spiked; therefore, the associated batch MS/MSD may not reflect the same compounds as the samples contained in the analytical report. When these MS/MSD results fail to meet acceptance criteria, the data is evaluated. If the LCS is within acceptance criteria, the batch is considered acceptable. The acceptance criteria do not apply to samples that are diluted for organics if the native sample amount is 4x the concentration of the spike.

For certain methods, a Matrix Spike/Sample Duplicate (MS/DU) may be included in the QC batch in place of the MS/MSD. For the parameters (i.e. pH, ignitability) where it is not possible to prepare a spiked sample, a Sample Duplicate may be included in the QC batch. However, a Sample Duplicate is less likely to provide usable precision statistics depending on the likelihood of finding concentrations below the standard reporting limit. When the Sample Duplicate result fails to meet acceptance criteria, the data is evaluated.

SURROGATE COMPOUNDS

In addition to these batch-related QC indicators, each organic environmental and QC sample is spiked with surrogate compounds. Surrogates are organic chemicals that behave similarly to the analytes of interest and that are rarely present in the environment. Surrogate recoveries are used to monitor the individual performance of a sample in the analytical system.

If surrogate recoveries are biased high in the LCS, LCSD, or the Method Blank, and the associated sample(s) are ND, the batch is acceptable. Otherwise, if the LCS, LCSD, or Method Blank surrogate(s) fail to meet recovery criteria, the entire sample batch is reprepped and reanalyzed. If the surrogate recoveries are outside criteria for environmental samples, the samples will be reprepped and reanalyzed unless there is objective evidence of matrix interference or if the sample dilution is greater than the threshold outlined in the associated method SOP.

For the GC/MS BNA methods, the surrogate criterion is that two of the three surrogates for each fraction must meet acceptance criteria. The third surrogate must have a recovery of ten percent or greater.

For the Pesticide, PCB, and PAH methods, the surrogate criterion is that one of two surrogate compounds must meet acceptance criteria.

STL North Canton Certifications and Approvals:

California (#01144CA), Connecticut (#PH-0590), Florida (#E87225),
Illinois (#200004), Kansas (#E10336), Massachusetts (#M-OH048), Maryland (#272), Minnesota (#39-999-348), New Jersey (#OH001), New York (#10975), North Carolina (#39702), Ohio (#6090), OhioVAP (#CL0024), Rhode Island (#237), South Carolina (#92007001, #92007002, #92007003), Tennessee (#02903), Utah (#QUAN9), Virginia (#00011), West Virginia (#210), Wisconsin (#999518190),NAVY, ARMY, USDA Soil Permit, ACIL Seal of Excellence – Participating Lab Status Award (#82)

Y:\Barb\STL headers\Qc846-Narrative_060204.doc, Revised06/02/04 DJL

EXECUTIVE SUMMARY - Detection Highlights

A6A170248

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD
GW-35298-011606-JY-054 01/16/06 10:50 001				
Acetone	700 J,B	8300	ug/L	SW846 8260B
Chlorobenzene	12000	330	ug/L	SW846 8260B
Ethylbenzene	530	330	ug/L	SW846 8260B
Toluene	1900	330	ug/L	SW846 8260B
Xylenes (total)	1300	670	ug/L	SW846 8260B
GW-35298-011606-JY-055 01/16/06 10:26 002				
Acetone	45 J,B	450	ug/L	SW846 8260B
Benzene	170	18	ug/L	SW846 8260B
Chlorobenzene	510	18	ug/L	SW846 8260B
GW-35298-011606-JY-056 01/16/06 11:21 003				
Acetone	4700 J,B	62000	ug/L	SW846 8260B
Benzene	12000	2500	ug/L	SW846 8260B
Chlorobenzene	89000	2500	ug/L	SW846 8260B
Ethylbenzene	4700	2500	ug/L	SW846 8260B
Toluene	9700	2500	ug/L	SW846 8260B
Xylenes (total)	17000	5000	ug/L	SW846 8260B
GW-35298-011606-JY-057 01/16/06 11:50 004				
Acetone	290 J,B	3600	ug/L	SW846 8260B
Benzene	5300	140	ug/L	SW846 8260B
Chlorobenzene	780	140	ug/L	SW846 8260B
GW-35298-011606-JY-058 01/16/06 12:11 005				
Acetone	1900 J,B	25000	ug/L	SW846 8260B
Benzene	31000	1000	ug/L	SW846 8260B
Chlorobenzene	4900	1000	ug/L	SW846 8260B
GW-35298-011606-JY-059 01/16/06 13:30 006				
Benzene	0.43 J	1.0	ug/L	SW846 8260B
GW-35298-011606-JY-060 01/16/06 13:26 007				
Acetone	10000 J,B	120000	ug/L	SW846 8260B
Benzene	41000	5000	ug/L	SW846 8260B
2-Butanone	17000 J	120000	ug/L	SW846 8260B
Chlorobenzene	110000	5000	ug/L	SW846 8260B

(Continued on next page)

EXECUTIVE SUMMARY - Detection Highlights

A6A170248

PARAMETER	RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD
GW-35298-011606-JY-060 01/16/06 13:26 007				
Ethylbenzene	4700 J	5000	ug/L	SW846 8260B
Toluene	6800	5000	ug/L	SW846 8260B
Xylenes (total)	19000	10000	ug/L	SW846 8260B
GW-35298-011606-JY-061 01/16/06 14:36 008				
Acetone	55 J,B	620	ug/L	SW846 8260B
Benzene	46	25	ug/L	SW846 8260B
2-Butanone	15 J	620	ug/L	SW846 8260B
Chlorobenzene	910	25	ug/L	SW846 8260B
Chloroethane	51	25	ug/L	SW846 8260B
1,1-Dichloroethane	140	25	ug/L	SW846 8260B
Ethylbenzene	29	25	ug/L	SW846 8260B
Toluene	58	25	ug/L	SW846 8260B
1,1,1-Trichloroethane	26	25	ug/L	SW846 8260B
Xylenes (total)	110	50	ug/L	SW846 8260B
GW-35298-011606-JY-062 01/16/06 14:45 009				
Acetone	0.91 J,B	25	ug/L	SW846 8260B
GW-35298-011606-JY-063 01/16/06 15:30 010				
Chloromethane	0.15 J	1.0	ug/L	SW846 8260B
GW-35298-011606-JY-064 01/16/06 15:26 011				
Acetone	28 J,B	330	ug/L	SW846 8260B
Benzene	10 J	13	ug/L	SW846 8260B
Chlorobenzene	510	13	ug/L	SW846 8260B
TB-35298-011606-JY-065 01/16/06 012				
Acetone	3.4 J,B	25	ug/L	SW846 8260B
4-Methyl-2-pentanone	0.37 J	50	ug/L	SW846 8260B

MI0013070

ANALYTICAL METHODS SUMMARY

A6A170248

PARAMETER	ANALYTICAL METHOD
Volatile Organics by GC/MS	SW846 8260B

References:

SW846 "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods", Third Edition, November 1986 and its updates.

SAMPLE SUMMARY

A6A170248

WO #	SAMPLE#	CLIENT SAMPLE ID	SAMPLED DATE	SAMP TIME
HVRR9	001	GW-35298-011606-JY-054	01/16/06	10:50
HVRTP	002	GW-35298-011606-JY-055	01/16/06	10:26
HVRTR	003	GW-35298-011606-JY-056	01/16/06	11:21
HVRTV	004	GW-35298-011606-JY-057	01/16/06	11:50
HVRTX	005	GW-35298-011606-JY-058	01/16/06	12:11
HVRT1	006	GW-35298-011606-JY-059	01/16/06	13:30
HVRT3	007	GW-35298-011606-JY-060	01/16/06	13:26
HVRT4	008	GW-35298-011606-JY-061	01/16/06	14:36
HVRT5	009	GW-35298-011606-JY-062	01/16/06	14:45
HVRT6	010	GW-35298-011606-JY-063	01/16/06	15:30
HVRT8	011	GW-35298-011606-JY-064	01/16/06	15:26
HVRVA	012	TB-35298-011606-JY-065	01/16/06	

NOTE(S):

- The analytical results of the samples listed above are presented on the following pages.
- All calculations are performed before rounding to avoid round-off errors in calculated results.
- Results noted as "ND" were not detected at or above the stated limit.
- This report must not be reproduced, except in full, without the written approval of the laboratory.
- Results for the following parameters are never reported on a dry weight basis: color, corrosivity, density, flashpoint, ignitability, layers, odor, paint filter test, pH, porosity pressure, reactivity, redox potential, specific gravity, spot tests, solids, solubility, temperature, viscosity, and weight.

Conestoga-Rovers & Associates, Inc.

Client Sample ID: GW-35298-011606-JY-054

GC/MS Volatiles

Lot-Sample #...: A6A170248-001 **Work Order #...:** HVRR91AA **Matrix.....:** WG
Date Sampled...: 01/16/06 10:50 **Date Received..:** 01/17/06
Prep Date.....: 01/20/06 **Analysis Date..:** 01/20/06
Prep Batch #...: 6023048
Dilution Factor: 333.33 **Method.....:** SW846 8260B

PARAMETER	RESULT	REPORTING LIMIT	UNITS
1,2,4-Trimethylbenzene	ND	330	ug/L
1,3,5-Trimethylbenzene	ND	330	ug/L
Acetone	**700 J,B**	**8300**	**ug/L**
Benzene	ND	330	ug/L
Bromodichloromethane	ND	330	ug/L
Bromoform	ND	330	ug/L
Bromomethane	ND	330	ug/L
2-Butanone	ND	8300	ug/L
Carbon disulfide	ND	1700	ug/L
Carbon tetrachloride	ND	330	ug/L
Chlorobenzene	**12000**	**330**	**ug/L**
Chloroethane	ND	330	ug/L
Chloroform	ND	330	ug/L
Chloromethane	ND	330	ug/L
Cyclohexane	ND	330	ug/L
Dibromochloromethane	ND	330	ug/L
1,2-Dibromo-3-chloro-propane	ND	330	ug/L
1,2-Dibromoethane	ND	330	ug/L
1,2-Dichlorobenzene	ND	330	ug/L
1,3-Dichlorobenzene	ND	330	ug/L
1,4-Dichlorobenzene	ND	330	ug/L
Dichlorodifluoromethane	ND	330	ug/L
1,1-Dichloroethane	ND	330	ug/L
1,2-Dichloroethane	ND	330	ug/L
1,1-Dichloroethene	ND	330	ug/L
cis-1,2-Dichloroethene	ND	330	ug/L
trans-1,2-Dichloroethene	ND	330	ug/L
1,2-Dichloropropane	ND	330	ug/L
cis-1,3-Dichloropropene	ND	330	ug/L
trans-1,3-Dichloropropene	ND	330	ug/L
Ethylbenzene	**530**	**330**	**ug/L**
2-Hexanone	ND	17000	ug/L
Isopropylbenzene	ND	1700	ug/L
Methyl acetate	ND	3300	ug/L
Methylene chloride	ND	1700	ug/L
Methylcyclohexane	ND	330	ug/L
4-Methyl-2-pentanone	ND	17000	ug/L
Methyl tert-butyl ether	ND	1700	ug/L

(Continued on next page)

Conestoga-Rovers & Associates, Inc.

Client Sample ID: GW-35298-011606-JY-054

GC/MS Volatiles

Lot-Sample #...: A6A170248-001 **Work Order #...:** HVRR91AA **Matrix.....:** WG

PARAMETER	RESULT	REPORTING LIMIT	UNITS
Styrene	ND	330	ug/L
1,1,2,2-Tetrachloroethane	ND	330	ug/L
Tetrachloroethene	ND	330	ug/L
Toluene	**1900**	**330**	**ug/L**
1,2,4-Trichloro-benzene	ND	1700	ug/L
1,1,1-Trichloroethane	ND	330	ug/L
1,1,2-Trichloroethane	ND	330	ug/L
Trichloroethene	ND	330	ug/L
Trichlorofluoromethane	ND	330	ug/L
1,1,2-Trichloro-1,2,2-trifluoroethane	ND	330	ug/L
Vinyl chloride	ND	330	ug/L
Xylenes (total)	**1300**	**670**	**ug/L**

SURROGATE	PERCENT RECOVERY	RECOVERY LIMITS
Dibromofluoromethane	91	(73 - 122)
1,2-Dichloroethane-d4	98	(61 - 128)
Toluene-d8	92	(76 - 110)
4-Bromofluorobenzene	84	(74 - 116)

NOTE(S):

J Estimated result. Result is less than RL.

B Method blank contamination. The associated method blank contains the target analyte at a reportable level.

Conestoga-Rovers & Associates, Inc.

Client Sample ID: GW-35298-011606-JY-055

GC/MS Volatiles

Lot-Sample #...: A6A170248-002 **Work Order #...:** HVRTP1AA **Matrix.....:** WG
Date Sampled...: 01/16/06 10:26 **Date Received..:** 01/17/06
Prep Date.....: 01/19/06 **Analysis Date..:** 01/19/06
Prep Batch #...: 6020044
Dilution Factor: 18.18 **Method.....:** SW846 8260B

PARAMETER	RESULT	REPORTING LIMIT	UNITS
1,2,4-Trimethylbenzene	ND	18	ug/L
1,3,5-Trimethylbenzene	ND	18	ug/L
Acetone	**45 J,B**	**450**	**ug/L**
Benzene	**170**	**18**	**ug/L**
Bromodichloromethane	ND	18	ug/L
Bromoform	ND	18	ug/L
Bromomethane	ND	18	ug/L
2-Butanone	ND	450	ug/L
Carbon disulfide	ND	91	ug/L
Carbon tetrachloride	ND	18	ug/L
Chlorobenzene	**510**	**18**	**ug/L**
Chloroethane	ND	18	ug/L
Chloroform	ND	18	ug/L
Chloromethane	ND	18	ug/L
Cyclohexane	ND	18	ug/L
Dibromochloromethane	ND	18	ug/L
1,2-Dibromo-3-chloro-propane	ND	18	ug/L
1,2-Dibromoethane	ND	18	ug/L
1,2-Dichlorobenzene	ND	18	ug/L
1,3-Dichlorobenzene	ND	18	ug/L
1,4-Dichlorobenzene	ND	18	ug/L
Dichlorodifluoromethane	ND	18	ug/L
1,1-Dichloroethane	ND	18	ug/L
1,2-Dichloroethane	ND	18	ug/L
1,1-Dichloroethene	ND	18	ug/L
cis-1,2-Dichloroethene	ND	18	ug/L
trans-1,2-Dichloroethene	ND	18	ug/L
1,2-Dichloropropane	ND	18	ug/L
cis-1,3-Dichloropropene	ND	18	ug/L
trans-1,3-Dichloropropene	ND	18	ug/L
Ethylbenzene	ND	18	ug/L
2-Hexanone	ND	910	ug/L
Isopropylbenzene	ND	91	ug/L
Methyl acetate	ND	180	ug/L
Methylene chloride	ND	91	ug/L
Methylcyclohexane	ND	18	ug/L
4-Methyl-2-pentanone	ND	910	ug/L
Methyl tert-butyl ether	ND	91	ug/L

(Continued on next page)

Conestoga-Rovers & Associates, Inc.

Client Sample ID: GW-35298-011606-JY-055

GC/MS Volatiles

Lot-Sample #...: A6A170248-002 **Work Order #...:** HVRTP1AA **Matrix.....:** WG

PARAMETER	RESULT	REPORTING LIMIT	UNITS
Styrene	ND	18	ug/L
1,1,2,2-Tetrachloroethane	ND	18	ug/L
Tetrachloroethene	ND	18	ug/L
Toluene	ND	18	ug/L
1,2,4-Trichloro-benzene	ND	91	ug/L
1,1,1-Trichloroethane	ND	18	ug/L
1,1,2-Trichloroethane	ND	18	ug/L
Trichloroethene	ND	18	ug/L
Trichlorofluoromethane	ND	18	ug/L
1,1,2-Trichloro-1,2,2-trifluoroethane	ND	18	ug/L
Vinyl chloride	ND	18	ug/L
Xylenes (total)	ND	36	ug/L

SURROGATE	PERCENT RECOVERY	RECOVERY LIMITS
Dibromofluoromethane	92	(73 - 122)
1,2-Dichloroethane-d4	97	(61 - 128)
Toluene-d8	90	(76 - 110)
4-Bromofluorobenzene	85	(74 - 116)

NOTE(S):

J Estimated result. Result is less than RL.

B Method blank contamination. The associated method blank contains the target analyte at a reportable level.

MI0013076

Conestoga-Rovers & Associates, Inc.

Client Sample ID: GW-35298-011606-JY-056

GC/MS Volatiles

Lot-Sample #...: A6A170248-003 **Work Order #...:** HVRTR1AA **Matrix.....:** WG
Date Sampled...: 01/16/06 11:21 **Date Received..:** 01/17/06
Prep Date.....: 01/19/06 **Analysis Date..:** 01/19/06
Prep Batch #...: 6020044
Dilution Factor: 2500 **Method.....:** SW846 8260B

PARAMETER	RESULT	REPORTING LIMIT	UNITS
1,2,4-Trimethylbenzene	ND	2500	ug/L
1,3,5-Trimethylbenzene	ND	2500	ug/L
Acetone	**4700 J,B**	**62000**	**ug/L**
Benzene	**12000**	**2500**	**ug/L**
Bromodichloromethane	ND	2500	ug/L
Bromoform	ND	2500	ug/L
Bromomethane	ND	2500	ug/L
2-Butanone	ND	62000	ug/L
Carbon disulfide	ND	12000	ug/L
Carbon tetrachloride	ND	2500	ug/L
Chlorobenzene	**89000**	**2500**	**ug/L**
Chloroethane	ND	2500	ug/L
Chloroform	ND	2500	ug/L
Chloromethane	ND	2500	ug/L
Cyclohexane	ND	2500	ug/L
Dibromochloromethane	ND	2500	ug/L
1,2-Dibromo-3-chloro-propane	ND	2500	ug/L
1,2-Dibromoethane	ND	2500	ug/L
1,2-Dichlorobenzene	ND	2500	ug/L
1,3-Dichlorobenzene	ND	2500	ug/L
1,4-Dichlorobenzene	ND	2500	ug/L
Dichlorodifluoromethane	ND	2500	ug/L
1,1-Dichloroethane	ND	2500	ug/L
1,2-Dichloroethane	ND	2500	ug/L
1,1-Dichloroethene	ND	2500	ug/L
cis-1,2-Dichloroethene	ND	2500	ug/L
trans-1,2-Dichloroethene	ND	2500	ug/L
1,2-Dichloropropane	ND	2500	ug/L
cis-1,3-Dichloropropene	ND	2500	ug/L
trans-1,3-Dichloropropene	ND	2500	ug/L
Ethylbenzene	**4700**	**2500**	**ug/L**
2-Hexanone	ND	120000	ug/L
Isopropylbenzene	ND	12000	ug/L
Methyl acetate	ND	25000	ug/L
Methylene chloride	ND	12000	ug/L
Methylcyclohexane	ND	2500	ug/L
4-Methyl-2-pentanone	ND	120000	ug/L
Methyl tert-butyl ether	ND	12000	ug/L

(Continued on next page)

Conestoga-Rovers & Associates, Inc.

Client Sample ID: GW-35298-011606-JY-056

GC/MS Volatiles

Lot-Sample #...: A6A170248-003 **Work Order #...:** HVRTR1AA **Matrix.....:** WG

PARAMETER	RESULT	REPORTING LIMIT	UNITS
Styrene	ND	2500	ug/L
1,1,2,2-Tetrachloroethane	ND	2500	ug/L
Tetrachloroethene	ND	2500	ug/L
Toluene	**9700**	**2500**	**ug/L**
1,2,4-Trichloro-benzene	ND	12000	ug/L
1,1,1-Trichloroethane	ND	2500	ug/L
1,1,2-Trichloroethane	ND	2500	ug/L
Trichloroethene	ND	2500	ug/L
Trichlorofluoromethane	ND	2500	ug/L
1,1,2-Trichloro-1,2,2-trifluoroethane	ND	2500	ug/L
Vinyl chloride	ND	2500	ug/L
Xylenes (total)	**17000**	**5000**	**ug/L**

SURROGATE	PERCENT RECOVERY	RECOVERY LIMITS
Dibromofluoromethane	88	(73 - 122)
1,2-Dichloroethane-d4	95	(61 - 128)
Toluene-d8	93	(76 - 110)
4-Bromofluorobenzene	84	(74 - 116)

NOTE(S):

J Estimated result. Result is less than RL.

B Method blank contamination. The associated method blank contains the target analyte at a reportable level.

Conestoga-Rovers & Associates, Inc.

Client Sample ID: GW-35298-011606-JY-057

GC/MS Volatiles

Lot-Sample #...: A6A170248-004 **Work Order #...:** HVRTV1AA **Matrix.....:** WG
Date Sampled...: 01/16/06 11:50 **Date Received..:** 01/17/06
Prep Date.....: 01/19/06 **Analysis Date..:** 01/19/06
Prep Batch #...: 6020044
Dilution Factor: 142.86 **Method.....:** SW846 8260B

PARAMETER	RESULT	REPORTING LIMIT	UNITS
1,2,4-Trimethylbenzene	ND	140	ug/L
1,3,5-Trimethylbenzene	ND	140	ug/L
Acetone	**290 J,B**	**3600**	**ug/L**
Benzene	**5300**	**140**	**ug/L**
Bromodichloromethane	ND	140	ug/L
Bromoform	ND	140	ug/L
Bromomethane	ND	140	ug/L
2-Butanone	ND	3600	ug/L
Carbon disulfide	ND	710	ug/L
Carbon tetrachloride	ND	140	ug/L
Chlorobenzene	**780**	**140**	**ug/L**
Chloroethane	ND	140	ug/L
Chloroform	ND	140	ug/L
Chloromethane	ND	140	ug/L
Cyclohexane	ND	140	ug/L
Dibromochloromethane	ND	140	ug/L
1,2-Dibromo-3-chloro-propane	ND	140	ug/L
1,2-Dibromoethane	ND	140	ug/L
1,2-Dichlorobenzene	ND	140	ug/L
1,3-Dichlorobenzene	ND	140	ug/L
1,4-Dichlorobenzene	ND	140	ug/L
Dichlorodifluoromethane	ND	140	ug/L
1,1-Dichloroethane	ND	140	ug/L
1,2-Dichloroethane	ND	140	ug/L
1,1-Dichloroethene	ND	140	ug/L
cis-1,2-Dichloroethene	ND	140	ug/L
trans-1,2-Dichloroethene	ND	140	ug/L
1,2-Dichloropropane	ND	140	ug/L
cis-1,3-Dichloropropene	ND	140	ug/L
trans-1,3-Dichloropropene	ND	140	ug/L
Ethylbenzene	ND	140	ug/L
2-Hexanone	ND	7100	ug/L
Isopropylbenzene	ND	710	ug/L
Methyl acetate	ND	1400	ug/L
Methylene chloride	ND	710	ug/L
Methylcyclohexane	ND	140	ug/L
4-Methyl-2-pentanone	ND	7100	ug/L
Methyl tert-butyl ether	ND	710	ug/L

(Continued on next page)

MI0013079

Conestoga-Rovers & Associates, Inc.

Client Sample ID: GW-35298-011606-JY-057

GC/MS Volatiles

Lot-Sample #...: A6A170248-004 **Work Order #...:** HVRTV1AA **Matrix.....:** WG

PARAMETER	RESULT	REPORTING LIMIT	UNITS
Styrene	ND	140	ug/L
1,1,2,2-Tetrachloroethane	ND	140	ug/L
Tetrachloroethene	ND	140	ug/L
Toluene	ND	140	ug/L
1,2,4-Trichloro-benzene	ND	710	ug/L
1,1,1-Trichloroethane	ND	140	ug/L
1,1,2-Trichloroethane	ND	140	ug/L
Trichloroethene	ND	140	ug/L
Trichlorofluoromethane	ND	140	ug/L
1,1,2-Trichloro-1,2,2-trifluoroethane	ND	140	ug/L
Vinyl chloride	ND	140	ug/L
Xylenes (total)	ND	290	ug/L

SURROGATE	PERCENT RECOVERY	RECOVERY LIMITS
Dibromofluoromethane	92	(73 - 122)
1,2-Dichloroethane-d4	97	(61 - 128)
Toluene-d8	92	(76 - 110)
4-Bromofluorobenzene	85	(74 - 116)

NOTE(S):

J Estimated result. Result is less than RL.

B Method blank contamination. The associated method blank contains the target analyte at a reportable level.

Conestoga-Rovers & Associates, Inc.

Client Sample ID: GW-35298-011606-JY-058

GC/MS Volatiles

Lot-Sample #...: A6A170248-005 **Work Order #...:** HVRTX1AA **Matrix.....:** WG
Date Sampled...: 01/16/06 12:11 **Date Received..:** 01/17/06
Prep Date.....: 01/20/06 **Analysis Date..:** 01/20/06
Prep Batch #...: 6023048
Dilution Factor: 1000 **Method.....:** SW846 8260B

PARAMETER	RESULT	REPORTING LIMIT	UNITS
1,2,4-Trimethylbenzene	ND	1000	ug/L
1,3,5-Trimethylbenzene	ND	1000	ug/L
Acetone	**1900 J,B**	**25000**	**ug/L**
Benzene	**31000**	**1000**	**ug/L**
Bromodichloromethane	ND	1000	ug/L
Bromoform	ND	1000	ug/L
Bromomethane	ND	1000	ug/L
2-Butanone	ND	25000	ug/L
Carbon disulfide	ND	5000	ug/L
Carbon tetrachloride	ND	1000	ug/L
Chlorobenzene	**4900**	**1000**	**ug/L**
Chloroethane	ND	1000	ug/L
Chloroform	ND	1000	ug/L
Chloromethane	ND	1000	ug/L
Cyclohexane	ND	1000	ug/L
Dibromochloromethane	ND	1000	ug/L
1,2-Dibromo-3-chloro-propane	ND	1000	ug/L
1,2-Dibromoethane	ND	1000	ug/L
1,2-Dichlorobenzene	ND	1000	ug/L
1,3-Dichlorobenzene	ND	1000	ug/L
1,4-Dichlorobenzene	ND	1000	ug/L
Dichlorodifluoromethane	ND	1000	ug/L
1,1-Dichloroethane	ND	1000	ug/L
1,2-Dichloroethane	ND	1000	ug/L
1,1-Dichloroethene	ND	1000	ug/L
cis-1,2-Dichloroethene	ND	1000	ug/L
trans-1,2-Dichloroethene	ND	1000	ug/L
1,2-Dichloropropane	ND	1000	ug/L
cis-1,3-Dichloropropene	ND	1000	ug/L
trans-1,3-Dichloropropene	ND	1000	ug/L
Ethylbenzene	ND	1000	ug/L
2-Hexanone	ND	50000	ug/L
Isopropylbenzene	ND	5000	ug/L
Methyl acetate	ND	10000	ug/L
Methylene chloride	ND	5000	ug/L
Methylcyclohexane	ND	1000	ug/L
4-Methyl-2-pentanone	ND	50000	ug/L
Methyl tert-butyl ether	ND	5000	ug/L

(Continued on next page)

MI0013081

Conestoga-Rovers & Associates, Inc.

Client Sample ID: GW-35298-011606-JY-058

GC/MS Volatiles

Lot-Sample #...: A6A170248-005 **Work Order #...:** HVRTX1AA **Matrix.....:** WG

PARAMETER	RESULT	REPORTING LIMIT	UNITS
Styrene	ND	1000	ug/L
1,1,2,2-Tetrachloroethane	ND	1000	ug/L
Tetrachloroethene	ND	1000	ug/L
Toluene	ND	1000	ug/L
1,2,4-Trichloro-benzene	ND	5000	ug/L
1,1,1-Trichloroethane	ND	1000	ug/L
1,1,2-Trichloroethane	ND	1000	ug/L
Trichloroethene	ND	1000	ug/L
Trichlorofluoromethane	ND	1000	ug/L
1,1,2-Trichloro-1,2,2-trifluoroethane	ND	1000	ug/L
Vinyl chloride	ND	1000	ug/L
Xylenes (total)	ND	2000	ug/L

SURROGATE	PERCENT RECOVERY	RECOVERY LIMITS
Dibromofluoromethane	88	(73 - 122)
1,2-Dichloroethane-d4	93	(61 - 128)
Toluene-d8	92	(76 - 110)
4-Bromofluorobenzene	79	(74 - 116)

NOTE(S):

J Estimated result. Result is less than RL.

B Method blank contamination. The associated method blank contains the target analyte at a reportable level.

MI0013082

Conestoga-Rovers & Associates, Inc.

Client Sample ID: GW-35298-011606-JY-059

GC/MS Volatiles

Lot-Sample #...: A6A170248-006 **Work Order #...:** HVRT11AA **Matrix.....:** WG
Date Sampled...: 01/16/06 13:30 **Date Received..:** 01/17/06
Prep Date.....: 01/19/06 **Analysis Date..:** 01/19/06
Prep Batch #...: 6020044
Dilution Factor: 1 **Method.....:** SW846 8260B

PARAMETER	RESULT	REPORTING LIMIT	UNITS
1,2,4-Trimethylbenzene	ND	1.0	ug/L
1,3,5-Trimethylbenzene	ND	1.0	ug/L
Acetone	ND	25	ug/L
Benzene	**0.43 J**	**1.0**	**ug/L**
Bromodichloromethane	ND	1.0	ug/L
Bromoform	ND	1.0	ug/L
Bromomethane	ND	1.0	ug/L
2-Butanone	ND	25	ug/L
Carbon disulfide	ND	5.0	ug/L
Carbon tetrachloride	ND	1.0	ug/L
Chlorobenzene	ND	1.0	ug/L
Chloroethane	ND	1.0	ug/L
Chloroform	ND	1.0	ug/L
Chloromethane	ND	1.0	ug/L
Cyclohexane	ND	1.0	ug/L
Dibromochloromethane	ND	1.0	ug/L
1,2-Dibromo-3-chloro-propane	ND	1.0	ug/L
1,2-Dibromoethane	ND	1.0	ug/L
1,2-Dichlorobenzene	ND	1.0	ug/L
1,3-Dichlorobenzene	ND	1.0	ug/L
1,4-Dichlorobenzene	ND	1.0	ug/L
Dichlorodifluoromethane	ND	1.0	ug/L
1,1-Dichloroethane	ND	1.0	ug/L
1,2-Dichloroethane	ND	1.0	ug/L
1,1-Dichloroethene	ND	1.0	ug/L
cis-1,2-Dichloroethene	ND	1.0	ug/L
trans-1,2-Dichloroethene	ND	1.0	ug/L
1,2-Dichloropropane	ND	1.0	ug/L
cis-1,3-Dichloropropene	ND	1.0	ug/L
trans-1,3-Dichloropropene	ND	1.0	ug/L
Ethylbenzene	ND	1.0	ug/L
2-Hexanone	ND	50	ug/L
Isopropylbenzene	ND	5.0	ug/L
Methyl acetate	ND	10	ug/L
Methylene chloride	ND	5.0	ug/L
Methylcyclohexane	ND	1.0	ug/L
4-Methyl-2-pentanone	ND	50	ug/L
Methyl tert-butyl ether	ND	5.0	ug/L

(Continued on next page)

Conestoga-Rovers & Associates, Inc.

Client Sample ID: GW-35298-011606-JY-059

GC/MS Volatiles

Lot-Sample #...: A6A170248-006 **Work Order #...:** HVRT11AA **Matrix.....:** WG

PARAMETER	RESULT	REPORTING LIMIT	UNITS
Styrene	ND	1.0	ug/L
1,1,2,2-Tetrachloroethane	ND	1.0	ug/L
Tetrachloroethene	ND	1.0	ug/L
Toluene	ND	1.0	ug/L
1,2,4-Trichloro-benzene	ND	5.0	ug/L
1,1,1-Trichloroethane	ND	1.0	ug/L
1,1,2-Trichloroethane	ND	1.0	ug/L
Trichloroethene	ND	1.0	ug/L
Trichlorofluoromethane	ND	1.0	ug/L
1,1,2-Trichloro-1,2,2-trifluoroethane	ND	1.0	ug/L
Vinyl chloride	ND	1.0	ug/L
Xylenes (total)	ND	2.0	ug/L

SURROGATE	PERCENT RECOVERY	RECOVERY LIMITS
Dibromofluoromethane	93	(73 - 122)
1,2-Dichloroethane-d4	98	(61 - 128)
Toluene-d8	92	(76 - 110)
4-Bromofluorobenzene	85	(74 - 116)

NOTE(S):

J Estimated result. Result is less than RL.

Conestoga-Rovers & Associates, Inc.

Client Sample ID: GW-35298-011606-JY-060

GC/MS Volatiles

Lot-Sample #...: A6A170248-007 **Work Order #...:** HVRT31AA **Matrix.....:** WG
Date Sampled...: 01/16/06 13:26 **Date Received..:** 01/17/06
Prep Date.....: 01/20/06 **Analysis Date..:** 01/20/06
Prep Batch #...: 6023048
Dilution Factor: 5000 **Method.....:** SW846 8260B

PARAMETER	RESULT	REPORTING LIMIT	UNITS
1,2,4-Trimethylbenzene	ND	5000	ug/L
1,3,5-Trimethylbenzene	ND	5000	ug/L
Acetone	**10000 J,B**	**120000**	**ug/L**
Benzene	**41000**	**5000**	**ug/L**
Bromodichloromethane	ND	5000	ug/L
Bromoform	ND	5000	ug/L
Bromomethane	ND	5000	ug/L
2-Butanone	**17000 J**	**120000**	**ug/L**
Carbon disulfide	ND	25000	ug/L
Carbon tetrachloride	ND	5000	ug/L
Chlorobenzene	**110000**	**5000**	**ug/L**
Chloroethane	ND	5000	ug/L
Chloroform	ND	5000	ug/L
Chloromethane	ND	5000	ug/L
Cyclohexane	ND	5000	ug/L
Dibromochloromethane	ND	5000	ug/L
1,2-Dibromo-3-chloro-propane	ND	5000	ug/L
1,2-Dibromoethane	ND	5000	ug/L
1,2-Dichlorobenzene	ND	5000	ug/L
1,3-Dichlorobenzene	ND	5000	ug/L
1,4-Dichlorobenzene	ND	5000	ug/L
Dichlorodifluoromethane	ND	5000	ug/L
1,1-Dichloroethane	ND	5000	ug/L
1,2-Dichloroethane	ND	5000	ug/L
1,1-Dichloroethene	ND	5000	ug/L
cis-1,2-Dichloroethene	ND	5000	ug/L
trans-1,2-Dichloroethene	ND	5000	ug/L
1,2-Dichloropropane	ND	5000	ug/L
cis-1,3-Dichloropropene	ND	5000	ug/L
trans-1,3-Dichloropropene	ND	5000	ug/L
Ethylbenzene	**4700 J**	**5000**	**ug/L**
2-Hexanone	ND	250000	ug/L
Isopropylbenzene	ND	25000	ug/L
Methyl acetate	ND	50000	ug/L
Methylene chloride	ND	25000	ug/L
Methylcyclohexane	ND	5000	ug/L
4-Methyl-2-pentanone	ND	250000	ug/L
Methyl tert-butyl ether	ND	25000	ug/L

(Continued on next page)

Conestoga-Rovers & Associates, Inc.

Client Sample ID: GW-35298-011606-JY-060

GC/MS Volatiles

Lot-Sample #...: A6A170248-007 **Work Order #...:** HVRT31AA **Matrix.....:** WG

PARAMETER	RESULT	REPORTING LIMIT	UNITS
Styrene	ND	5000	ug/L
1,1,2,2-Tetrachloroethane	ND	5000	ug/L
Tetrachloroethene	ND	5000	ug/L
Toluene	**6800**	**5000**	**ug/L**
1,2,4-Trichloro-benzene	ND	25000	ug/L
1,1,1-Trichloroethane	ND	5000	ug/L
1,1,2-Trichloroethane	ND	5000	ug/L
Trichloroethene	ND	5000	ug/L
Trichlorofluoromethane	ND	5000	ug/L
1,1,2-Trichloro-1,2,2-trifluoroethane	ND	5000	ug/L
Vinyl chloride	ND	5000	ug/L
Xylenes (total)	**19000**	**10000**	**ug/L**

SURROGATE	PERCENT RECOVERY	RECOVERY LIMITS
Dibromofluoromethane	85	(73 - 122)
1,2-Dichloroethane-d4	93	(61 - 128)
Toluene-d8	93	(76 - 110)
4-Bromofluorobenzene	81	(74 - 116)

NOTE(S):

J Estimated result. Result is less than RL.

B Method blank contamination. The associated method blank contains the target analyte at a reportable level.

Conestoga-Rovers & Associates, Inc.

Client Sample ID: GW-35298-011606-JY-061

GC/MS Volatiles

Lot-Sample #...: A6A170248-008 **Work Order #...:** HVRT41AA **Matrix.....:** WG
Date Sampled...: 01/16/06 14:36 **Date Received..:** 01/17/06
Prep Date.....: 01/19/06 **Analysis Date..:** 01/19/06
Prep Batch #...: 6020044
Dilution Factor: 25 **Method.....:** SW846 8260B

PARAMETER	RESULT	REPORTING LIMIT	UNITS
1,2,4-Trimethylbenzene	ND	25	ug/L
1,3,5-Trimethylbenzene	ND	25	ug/L
Acetone	**55 J,B**	**620**	**ug/L**
Benzene	**46**	**25**	**ug/L**
Bromodichloromethane	ND	25	ug/L
Bromoform	ND	25	ug/L
Bromomethane	ND	25	ug/L
2-Butanone	**15 J**	**620**	**ug/L**
Carbon disulfide	ND	120	ug/L
Carbon tetrachloride	ND	25	ug/L
Chlorobenzene	**910**	**25**	**ug/L**
Chloroethane	**51**	**25**	**ug/L**
Chloroform	ND	25	ug/L
Chloromethane	ND	25	ug/L
Cyclohexane	ND	25	ug/L
Dibromochloromethane	ND	25	ug/L
1,2-Dibromo-3-chloro-propane	ND	25	ug/L
1,2-Dibromoethane	ND	25	ug/L
1,2-Dichlorobenzene	ND	25	ug/L
1,3-Dichlorobenzene	ND	25	ug/L
1,4-Dichlorobenzene	ND	25	ug/L
Dichlorodifluoromethane	ND	25	ug/L
1,1-Dichloroethane	**140**	**25**	**ug/L**
1,2-Dichloroethane	ND	25	ug/L
1,1-Dichloroethene	ND	25	ug/L
cis-1,2-Dichloroethene	ND	25	ug/L
trans-1,2-Dichloroethene	ND	25	ug/L
1,2-Dichloropropane	ND	25	ug/L
cis-1,3-Dichloropropene	ND	25	ug/L
trans-1,3-Dichloropropene	ND	25	ug/L
Ethylbenzene	**29**	**25**	**ug/L**
2-Hexanone	ND	1200	ug/L
Isopropylbenzene	ND	120	ug/L
Methyl acetate	ND	250	ug/L
Methylene chloride	ND	120	ug/L
Methylcyclohexane	ND	25	ug/L
4-Methyl-2-pentanone	ND	1200	ug/L
Methyl tert-butyl ether	ND	120	ug/L

(Continued on next page)

Conestoga-Rovers & Associates, Inc.

Client Sample ID: GW-35298-011606-JY-061

GC/MS Volatiles

Lot-Sample #...: A6A170248-008 **Work Order #...:** HVRT41AA **Matrix.....:** WG

PARAMETER	RESULT	REPORTING LIMIT	UNITS
Styrene	ND	25	ug/L
1,1,2,2-Tetrachloroethane	ND	25	ug/L
Tetrachloroethene	ND	25	ug/L
Toluene	**58**	**25**	**ug/L**
1,2,4-Trichloro-benzene	ND	120	ug/L
1,1,1-Trichloroethane	**26**	**25**	**ug/L**
1,1,2-Trichloroethane	ND	25	ug/L
Trichloroethene	ND	25	ug/L
Trichlorofluoromethane	ND	25	ug/L
1,1,2-Trichloro-1,2,2-trifluoroethane	ND	25	ug/L
Vinyl chloride	ND	25	ug/L
Xylenes (total)	**110**	**50**	**ug/L**

SURROGATE	PERCENT RECOVERY	RECOVERY LIMITS
Dibromofluoromethane	92	(73 - 122)
1,2-Dichloroethane-d4	99	(61 - 128)
Toluene-d8	90	(76 - 110)
4-Bromofluorobenzene	86	(74 - 116)

NOTE(S):

J Estimated result. Result is less than RL.

B Method blank contamination. The associated method blank contains the target analyte at a reportable level.

Conestoga-Rovers & Associates, Inc.

Client Sample ID: GW-35298-011606-JY-062

GC/MS Volatiles

Lot-Sample #...: A6A170248-009 **Work Order #...:** HVRT51AA **Matrix.....:** WG
Date Sampled...: 01/16/06 14:45 **Date Received..:** 01/17/06
Prep Date.....: 01/19/06 **Analysis Date..:** 01/19/06
Prep Batch #...: 6020044
Dilution Factor: 1 **Method.....:** SW846 8260B

PARAMETER	RESULT	REPORTING LIMIT	UNITS
1,2,4-Trimethylbenzene	ND	1.0	ug/L
1,3,5-Trimethylbenzene	ND	1.0	ug/L
Acetone	**0.91 J,B**	**25**	**ug/L**
Benzene	ND	1.0	ug/L
Bromodichloromethane	ND	1.0	ug/L
Bromoform	ND	1.0	ug/L
Bromomethane	ND	1.0	ug/L
2-Butanone	ND	25	ug/L
Carbon disulfide	ND	5.0	ug/L
Carbon tetrachloride	ND	1.0	ug/L
Chlorobenzene	ND	1.0	ug/L
Chloroethane	ND	1.0	ug/L
Chloroform	ND	1.0	ug/L
Chloromethane	ND	1.0	ug/L
Cyclohexane	ND	1.0	ug/L
Dibromochloromethane	ND	1.0	ug/L
1,2-Dibromo-3-chloro-propane	ND	1.0	ug/L
1,2-Dibromoethane	ND	1.0	ug/L
1,2-Dichlorobenzene	ND	1.0	ug/L
1,3-Dichlorobenzene	ND	1.0	ug/L
1,4-Dichlorobenzene	ND	1.0	ug/L
Dichlorodifluoromethane	ND	1.0	ug/L
1,1-Dichloroethane	ND	1.0	ug/L
1,2-Dichloroethane	ND	1.0	ug/L
1,1-Dichloroethene	ND	1.0	ug/L
cis-1,2-Dichloroethene	ND	1.0	ug/L
trans-1,2-Dichloroethene	ND	1.0	ug/L
1,2-Dichloropropane	ND	1.0	ug/L
cis-1,3-Dichloropropene	ND	1.0	ug/L
trans-1,3-Dichloropropene	ND	1.0	ug/L
Ethylbenzene	ND	1.0	ug/L
2-Hexanone	ND	50	ug/L
Isopropylbenzene	ND	5.0	ug/L
Methyl acetate	ND	10	ug/L
Methylene chloride	ND	5.0	ug/L
Methylcyclohexane	ND	1.0	ug/L
4-Methyl-2-pentanone	ND	50	ug/L
Methyl tert-butyl ether	ND	5.0	ug/L

(Continued on next page)

Conestoga-Rovers & Associates, Inc.

Client Sample ID: GW-35298-011606-JY-062

GC/MS Volatiles

Lot-Sample #...: A6A170248-009 **Work Order #...:** HVRT51AA **Matrix.....:** WG

PARAMETER	RESULT	REPORTING LIMIT	UNITS
Styrene	ND	1.0	ug/L
1,1,2,2-Tetrachloroethane	ND	1.0	ug/L
Tetrachloroethene	ND	1.0	ug/L
Toluene	ND	1.0	ug/L
1,2,4-Trichloro-benzene	ND	5.0	ug/L
1,1,1-Trichloroethane	ND	1.0	ug/L
1,1,2-Trichloroethane	ND	1.0	ug/L
Trichloroethene	ND	1.0	ug/L
Trichlorofluoromethane	ND	1.0	ug/L
1,1,2-Trichloro-1,2,2-trifluoroethane	ND	1.0	ug/L
Vinyl chloride	ND	1.0	ug/L
Xylenes (total)	ND	2.0	ug/L

SURROGATE	PERCENT RECOVERY	RECOVERY LIMITS
Dibromofluoromethane	94	(73 - 122)
1,2-Dichloroethane-d4	101	(61 - 128)
Toluene-d8	92	(76 - 110)
4-Bromofluorobenzene	84	(74 - 116)

NOTE(S):

J Estimated result. Result is less than RL.

B Method blank contamination. The associated method blank contains the target analyte at a reportable level.

Conestoga-Rovers & Associates, Inc.

Client Sample ID: GW-35298-011606-JY-063

GC/MS Volatiles

Lot-Sample #...: A6A170248-010 **Work Order #...:** HVRT61AA **Matrix.....:** WG
Date Sampled...: 01/16/06 15:30 **Date Received..:** 01/17/06
Prep Date.....: 01/19/06 **Analysis Date..:** 01/19/06
Prep Batch #...: 6020044
Dilution Factor: 1 **Method.....:** SW846 8260B

PARAMETER	RESULT	REPORTING LIMIT	UNITS
1,2,4-Trimethylbenzene	ND	1.0	ug/L
1,3,5-Trimethylbenzene	ND	1.0	ug/L
Acetone	ND	25	ug/L
Benzene	ND	1.0	ug/L
Bromodichloromethane	ND	1.0	ug/L
Bromoform	ND	1.0	ug/L
Bromomethane	ND	1.0	ug/L
2-Butanone	ND	25	ug/L
Carbon disulfide	ND	5.0	ug/L
Carbon tetrachloride	ND	1.0	ug/L
Chlorobenzene	ND	1.0	ug/L
Chloroethane	ND	1.0	ug/L
Chloroform	ND	1.0	ug/L
Chloromethane	**0.15 J**	**1.0**	**ug/L**
Cyclohexane	ND	1.0	ug/L
Dibromochloromethane	ND	1.0	ug/L
1,2-Dibromo-3-chloro-propane	ND	1.0	ug/L
1,2-Dibromoethane	ND	1.0	ug/L
1,2-Dichlorobenzene	ND	1.0	ug/L
1,3-Dichlorobenzene	ND	1.0	ug/L
1,4-Dichlorobenzene	ND	1.0	ug/L
Dichlorodifluoromethane	ND	1.0	ug/L
1,1-Dichloroethane	ND	1.0	ug/L
1,2-Dichloroethane	ND	1.0	ug/L
1,1-Dichloroethene	ND	1.0	ug/L
cis-1,2-Dichloroethene	ND	1.0	ug/L
trans-1,2-Dichloroethene	ND	1.0	ug/L
1,2-Dichloropropane	ND	1.0	ug/L
cis-1,3-Dichloropropene	ND	1.0	ug/L
trans-1,3-Dichloropropene	ND	1.0	ug/L
Ethylbenzene	ND	1.0	ug/L
2-Hexanone	ND	50	ug/L
Isopropylbenzene	ND	5.0	ug/L
Methyl acetate	ND	10	ug/L
Methylene chloride	ND	5.0	ug/L
Methylcyclohexane	ND	1.0	ug/L
4-Methyl-2-pentanone	ND	50	ug/L
Methyl tert-butyl ether	ND	5.0	ug/L

(Continued on next page)

MI0013091

Conestoga-Rovers & Associates, Inc.

Client Sample ID: GW-35298-011606-JY-063

GC/MS Volatiles

Lot-Sample #...: A6A170248-010 **Work Order #...:** HVRT61AA **Matrix.....:** WG

PARAMETER	RESULT	REPORTING LIMIT	UNITS
Styrene	ND	1.0	ug/L
1,1,2,2-Tetrachloroethane	ND	1.0	ug/L
Tetrachloroethene	ND	1.0	ug/L
Toluene	ND	1.0	ug/L
1,2,4-Trichloro-benzene	ND	5.0	ug/L
1,1,1-Trichloroethane	ND	1.0	ug/L
1,1,2-Trichloroethane	ND	1.0	ug/L
Trichloroethene	ND	1.0	ug/L
Trichlorofluoromethane	ND	1.0	ug/L
1,1,2-Trichloro-1,2,2-trifluoroethane	ND	1.0	ug/L
Vinyl chloride	ND	1.0	ug/L
Xylenes (total)	ND	2.0	ug/L

SURROGATE	PERCENT RECOVERY	RECOVERY LIMITS
Dibromofluoromethane	92	(73 - 122)
1,2-Dichloroethane-d4	99	(61 - 128)
Toluene-d8	91	(76 - 110)
4-Bromofluorobenzene	81	(74 - 116)

NOTE(S):

J Estimated result. Result is less than RL.

MI0013092

Conestoga-Rovers & Associates, Inc.

Client Sample ID: GW-35298-011606-JY-064

GC/MS Volatiles

Lot-Sample #...: A6A170248-011 **Work Order #...:** HVRT81AA **Matrix.....:** WG
Date Sampled...: 01/16/06 15:26 **Date Received..:** 01/17/06
Prep Date.....: 01/19/06 **Analysis Date..:** 01/19/06
Prep Batch #...: 6020044
Dilution Factor: 13.33 **Method.....:** SW846 8260B

PARAMETER	RESULT	REPORTING LIMIT	UNITS
1,2,4-Trimethylbenzene	ND	13	ug/L
1,3,5-Trimethylbenzene	ND	13	ug/L
Acetone	**28 J,B**	**330**	**ug/L**
Benzene	**10 J**	**13**	**ug/L**
Bromodichloromethane	ND	13	ug/L
Bromoform	ND	13	ug/L
Bromomethane	ND	13	ug/L
2-Butanone	ND	330	ug/L
Carbon disulfide	ND	67	ug/L
Carbon tetrachloride	ND	13	ug/L
Chlorobenzene	**510**	**13**	**ug/L**
Chloroethane	ND	13	ug/L
Chloroform	ND	13	ug/L
Chloromethane	ND	13	ug/L
Cyclohexane	ND	13	ug/L
Dibromochloromethane	ND	13	ug/L
1,2-Dibromo-3-chloro-propane	ND	13	ug/L
1,2-Dibromoethane	ND	13	ug/L
1,2-Dichlorobenzene	ND	13	ug/L
1,3-Dichlorobenzene	ND	13	ug/L
1,4-Dichlorobenzene	ND	13	ug/L
Dichlorodifluoromethane	ND	13	ug/L
1,1-Dichloroethane	ND	13	ug/L
1,2-Dichloroethane	ND	13	ug/L
1,1-Dichloroethene	ND	13	ug/L
cis-1,2-Dichloroethene	ND	13	ug/L
trans-1,2-Dichloroethene	ND	13	ug/L
1,2-Dichloropropane	ND	13	ug/L
cis-1,3-Dichloropropene	ND	13	ug/L
trans-1,3-Dichloropropene	ND	13	ug/L
Ethylbenzene	ND	13	ug/L
2-Hexanone	ND	670	ug/L
Isopropylbenzene	ND	67	ug/L
Methyl acetate	ND	130	ug/L
Methylene chloride	ND	67	ug/L
Methylcyclohexane	ND	13	ug/L
4-Methyl-2-pentanone	ND	670	ug/L
Methyl tert-butyl ether	ND	67	ug/L

(Continued on next page)

MI0013093

Conestoga-Rovers & Associates, Inc.

Client Sample ID: GW-35298-011606-JY-064

GC/MS Volatiles

Lot-Sample #...: A6A170248-011 **Work Order #...:** HVRT81AA **Matrix.....:** WG

PARAMETER	RESULT	REPORTING LIMIT	UNITS
Styrene	ND	13	ug/L
1,1,2,2-Tetrachloroethane	ND	13	ug/L
Tetrachloroethene	ND	13	ug/L
Toluene	ND	13	ug/L
1,2,4-Trichloro-benzene	ND	67	ug/L
1,1,1-Trichloroethane	ND	13	ug/L
1,1,2-Trichloroethane	ND	13	ug/L
Trichloroethene	ND	13	ug/L
Trichlorofluoromethane	ND	13	ug/L
1,1,2-Trichloro-1,2,2-trifluoroethane	ND	13	ug/L
Vinyl chloride	ND	13	ug/L
Xylenes (total)	ND	27	ug/L

SURROGATE	PERCENT RECOVERY	RECOVERY LIMITS
Dibromofluoromethane	93	(73 - 122)
1,2-Dichloroethane-d4	98	(61 - 128)
Toluene-d8	89	(76 - 110)
4-Bromofluorobenzene	84	(74 - 116)

NOTE(S):

J Estimated result. Result is less than RL.

B Method blank contamination. The associated method blank contains the target analyte at a reportable level.

MI0013094

Conestoga-Rovers & Associates, Inc.

Client Sample ID: TB-35298-011606-JY-065

GC/MS Volatiles

Lot-Sample #...: A6A170248-012 **Work Order #...:** HVRVA1AA **Matrix.....:** WQ
Date Sampled...: 01/16/06 **Date Received..:** 01/17/06
Prep Date.....: 01/19/06 **Analysis Date..:** 01/19/06
Prep Batch #...: 6020044
Dilution Factor: 1 **Method.....:** SW846 8260B

PARAMETER	RESULT	REPORTING LIMIT	UNITS
1,2,4-Trimethylbenzene	ND	1.0	ug/L
1,3,5-Trimethylbenzene	ND	1.0	ug/L
Acetone	**3.4 J,B**	**25**	**ug/L**
Benzene	ND	1.0	ug/L
Bromodichloromethane	ND	1.0	ug/L
Bromoform	ND	1.0	ug/L
Bromomethane	ND	1.0	ug/L
2-Butanone	ND	25	ug/L
Carbon disulfide	ND	5.0	ug/L
Carbon tetrachloride	ND	1.0	ug/L
Chlorobenzene	ND	1.0	ug/L
Chloroethane	ND	1.0	ug/L
Chloroform	ND	1.0	ug/L
Chloromethane	ND	1.0	ug/L
Cyclohexane	ND	1.0	ug/L
Dibromochloromethane	ND	1.0	ug/L
1,2-Dibromo-3-chloro-propane	ND	1.0	ug/L
1,2-Dibromoethane	ND	1.0	ug/L
1,2-Dichlorobenzene	ND	1.0	ug/L
1,3-Dichlorobenzene	ND	1.0	ug/L
1,4-Dichlorobenzene	ND	1.0	ug/L
Dichlorodifluoromethane	ND	1.0	ug/L
1,1-Dichloroethane	ND	1.0	ug/L
1,2-Dichloroethane	ND	1.0	ug/L
1,1-Dichloroethene	ND	1.0	ug/L
cis-1,2-Dichloroethene	ND	1.0	ug/L
trans-1,2-Dichloroethene	ND	1.0	ug/L
1,2-Dichloropropane	ND	1.0	ug/L
cis-1,3-Dichloropropene	ND	1.0	ug/L
trans-1,3-Dichloropropene	ND	1.0	ug/L
Ethylbenzene	ND	1.0	ug/L
2-Hexanone	ND	50	ug/L
Isopropylbenzene	ND	5.0	ug/L
Methyl acetate	ND	10	ug/L
Methylene chloride	ND	5.0	ug/L
Methylcyclohexane	ND	1.0	ug/L
4-Methyl-2-pentanone	**0.37 J**	**50**	**ug/L**
Methyl tert-butyl ether	ND	5.0	ug/L

(Continued on next page)

Conestoga-Rovers & Associates, Inc.

Client Sample ID: TB-35298-011606-JY-065

GC/MS Volatiles

Lot-Sample #...: A6A170248-012 **Work Order #...:** HVRVA1AA **Matrix.....:** WQ

PARAMETER	RESULT	REPORTING LIMIT	UNITS
Styrene	ND	1.0	ug/L
1,1,2,2-Tetrachloroethane	ND	1.0	ug/L
Tetrachloroethene	ND	1.0	ug/L
Toluene	ND	1.0	ug/L
1,2,4-Trichloro-benzene	ND	5.0	ug/L
1,1,1-Trichloroethane	ND	1.0	ug/L
1,1,2-Trichloroethane	ND	1.0	ug/L
Trichloroethene	ND	1.0	ug/L
Trichlorofluoromethane	ND	1.0	ug/L
1,1,2-Trichloro-1,2,2-trifluoroethane	ND	1.0	ug/L
Vinyl chloride	ND	1.0	ug/L
Xylenes (total)	ND	2.0	ug/L

SURROGATE	PERCENT RECOVERY	RECOVERY LIMITS
Dibromofluoromethane	92	(73 - 122)
1,2-Dichloroethane-d4	98	(61 - 128)
Toluene-d8	91	(76 - 110)
4-Bromofluorobenzene	83	(74 - 116)

NOTE(S):

J Estimated result. Result is less than RL.

B Method blank contamination. The associated method blank contains the target analyte at a reportable level.

SEVERN TRENT STL

QUALITY CONTROL SECTION

MI0013097

METHOD BLANK REPORT

GC/MS Volatiles

Client Lot #...: A6A170248 **Work Order #...:** HV1E01AA **Matrix.....:** WATER
MB Lot-Sample #: A6A200000-044

Prep Date.....: 01/19/06
Analysis Date..: 01/19/06 **Prep Batch #...:** 6020044
Dilution Factor: 1

PARAMETER	RESULT	REPORTING LIMIT	UNITS	METHOD
1,2,4-Trimethylbenzene	ND	1.0	ug/L	SW846 8260B
1,3,5-Trimethylbenzene	ND	1.0	ug/L	SW846 8260B
Acetone	**2.3 J**	**25**	**ug/L**	**SW846 8260B**
Benzene	ND	1.0	ug/L	SW846 8260B
Bromodichloromethane	ND	1.0	ug/L	SW846 8260B
Bromoform	ND	1.0	ug/L	SW846 8260B
Bromomethane	ND	1.0	ug/L	SW846 8260B
2-Butanone	ND	25	ug/L	SW846 8260B
Carbon disulfide	ND	5.0	ug/L	SW846 8260B
Carbon tetrachloride	ND	1.0	ug/L	SW846 8260B
Chlorobenzene	ND	1.0	ug/L	SW846 8260B
Chloroethane	ND	1.0	ug/L	SW846 8260B
Chloroform	ND	1.0	ug/L	SW846 8260B
Chloromethane	ND	1.0	ug/L	SW846 8260B
Cyclohexane	ND	1.0	ug/L	SW846 8260B
Dibromochloromethane	ND	1.0	ug/L	SW846 8260B
1,2-Dibromo-3-chloro-propane	ND	1.0	ug/L	SW846 8260B
1,2-Dibromoethane	ND	1.0	ug/L	SW846 8260B
1,2-Dichlorobenzene	ND	1.0	ug/L	SW846 8260B
1,3-Dichlorobenzene	ND	1.0	ug/L	SW846 8260B
1,4-Dichlorobenzene	ND	1.0	ug/L	SW846 8260B
Dichlorodifluoromethane	ND	1.0	ug/L	SW846 8260B
1,1-Dichloroethane	ND	1.0	ug/L	SW846 8260B
1,2-Dichloroethane	ND	1.0	ug/L	SW846 8260B
1,1-Dichloroethene	ND	1.0	ug/L	SW846 8260B
cis-1,2-Dichloroethene	ND	1.0	ug/L	SW846 8260B
trans-1,2-Dichloroethene	ND	1.0	ug/L	SW846 8260B
1,2-Dichloropropane	ND	1.0	ug/L	SW846 8260B
cis-1,3-Dichloropropene	ND	1.0	ug/L	SW846 8260B
trans-1,3-Dichloropropene	ND	1.0	ug/L	SW846 8260B
Ethylbenzene	ND	1.0	ug/L	SW846 8260B
2-Hexanone	ND	50	ug/L	SW846 8260B
Isopropylbenzene	ND	5.0	ug/L	SW846 8260B
Methyl acetate	ND	10	ug/L	SW846 8260B
Methylene chloride	ND	5.0	ug/L	SW846 8260B
Methylcyclohexane	ND	1.0	ug/L	SW846 8260B
4-Methyl-2-pentanone	ND	50	ug/L	SW846 8260B
Methyl tert-butyl ether	ND	5.0	ug/L	SW846 8260B
Styrene	ND	1.0	ug/L	SW846 8260B
1,1,2,2-Tetrachloroethane	ND	1.0	ug/L	SW846 8260B

(Continued on next page)

METHOD BLANK REPORT

GC/MS Volatiles

Client Lot #...: A6A170248 **Work Order #...:** HV1E01AA **Matrix.....:** WATER

PARAMETER	RESULT	REPORTING LIMIT	UNITS	METHOD
Tetrachloroethene	ND	1.0	ug/L	SW846 8260B
Toluene	ND	1.0	ug/L	SW846 8260B
1,2,4-Trichloro-benzene	ND	5.0	ug/L	SW846 8260B
1,1,1-Trichloroethane	ND	1.0	ug/L	SW846 8260B
1,1,2-Trichloroethane	ND	1.0	ug/L	SW846 8260B
Trichloroethene	ND	1.0	ug/L	SW846 8260B
Trichlorofluoromethane	ND	1.0	ug/L	SW846 8260B
1,1,2-Trichloro-1,2,2-trifluoroethane	ND	1.0	ug/L	SW846 8260B
Vinyl chloride	ND	1.0	ug/L	SW846 8260B
Xylenes (total)	ND	2.0	ug/L	SW846 8260B

SURROGATE	PERCENT RECOVERY	RECOVERY LIMITS
Dibromofluoromethane	96	(73 - 122)
1,2-Dichloroethane-d4	100	(61 - 128)
Toluene-d8	96	(76 - 110)
4-Bromofluorobenzene	85	(74 - 116)

NOTE(S):

Calculations are performed before rounding to avoid round-off errors in calculated results.

J Estimated result. Result is less than RL.

MI0013099

METHOD BLANK REPORT

GC/MS Volatiles

Client Lot #...: A6A170248 **Work Order #...:** HV4FW1AA **Matrix.....:** WATER
MB Lot-Sample #: A6A230000-048

Prep Date.....: 01/20/06
Analysis Date..: 01/20/06 **Prep Batch #...:** 6023048
Dilution Factor: 1

PARAMETER	RESULT	REPORTING LIMIT	UNITS	METHOD
1,2,4-Trimethylbenzene	ND	1.0	ug/L	SW846 8260B
1,3,5-Trimethylbenzene	ND	1.0	ug/L	SW846 8260B
Acetone	**1.6 J**	**25**	**ug/L**	**SW846 8260B**
Benzene	ND	1.0	ug/L	SW846 8260B
Bromodichloromethane	ND	1.0	ug/L	SW846 8260B
Bromoform	ND	1.0	ug/L	SW846 8260B
Bromomethane	ND	1.0	ug/L	SW846 8260B
2-Butanone	ND	25	ug/L	SW846 8260B
Carbon disulfide	ND	5.0	ug/L	SW846 8260B
Carbon tetrachloride	ND	1.0	ug/L	SW846 8260B
Chlorobenzene	ND	1.0	ug/L	SW846 8260B
Chloroethane	ND	1.0	ug/L	SW846 8260B
Chloroform	ND	1.0	ug/L	SW846 8260B
Chloromethane	ND	1.0	ug/L	SW846 8260B
Cyclohexane	ND	1.0	ug/L	SW846 8260B
Dibromochloromethane	ND	1.0	ug/L	SW846 8260B
1,2-Dibromo-3-chloro-propane	ND	1.0	ug/L	SW846 8260B
1,2-Dibromoethane	ND	1.0	ug/L	SW846 8260B
1,2-Dichlorobenzene	ND	1.0	ug/L	SW846 8260B
1,3-Dichlorobenzene	ND	1.0	ug/L	SW846 8260B
1,4-Dichlorobenzene	ND	1.0	ug/L	SW846 8260B
Dichlorodifluoromethane	ND	1.0	ug/L	SW846 8260B
1,1-Dichloroethane	ND	1.0	ug/L	SW846 8260B
1,2-Dichloroethane	ND	1.0	ug/L	SW846 8260B
1,1-Dichloroethene	ND	1.0	ug/L	SW846 8260B
cis-1,2-Dichloroethene	ND	1.0	ug/L	SW846 8260B
trans-1,2-Dichloroethene	ND	1.0	ug/L	SW846 8260B
1,2-Dichloropropane	ND	1.0	ug/L	SW846 8260B
cis-1,3-Dichloropropene	ND	1.0	ug/L	SW846 8260B
trans-1,3-Dichloropropene	ND	1.0	ug/L	SW846 8260B
Ethylbenzene	ND	1.0	ug/L	SW846 8260B
2-Hexanone	ND	50	ug/L	SW846 8260B
Isopropylbenzene	ND	5.0	ug/L	SW846 8260B
Methyl acetate	ND	10	ug/L	SW846 8260B
Methylene chloride	ND	5.0	ug/L	SW846 8260B
Methylcyclohexane	ND	1.0	ug/L	SW846 8260B
4-Methyl-2-pentanone	ND	50	ug/L	SW846 8260B
Methyl tert-butyl ether	ND	5.0	ug/L	SW846 8260B
Styrene	ND	1.0	ug/L	SW846 8260B
1,1,2,2-Tetrachloroethane	ND	1.0	ug/L	SW846 8260B

(Continued on next page)

MI0013100

METHOD BLANK REPORT

GC/MS Volatiles

Client Lot #...: A6A170248 **Work Order #...:** HV4FW1AA **Matrix.....:** WATER

PARAMETER	RESULT	REPORTING LIMIT	UNITS	METHOD
Tetrachloroethene	ND	1.0	ug/L	SW846 8260B
Toluene	ND	1.0	ug/L	SW846 8260B
1,2,4-Trichloro-benzene	ND	5.0	ug/L	SW846 8260B
1,1,1-Trichloroethane	ND	1.0	ug/L	SW846 8260B
1,1,2-Trichloroethane	ND	1.0	ug/L	SW846 8260B
Trichloroethene	ND	1.0	ug/L	SW846 8260B
Trichlorofluoromethane	ND	1.0	ug/L	SW846 8260B
1,1,2-Trichloro-1,2,2-trifluoroethane	ND	1.0	ug/L	SW846 8260B
Vinyl chloride	ND	1.0	ug/L	SW846 8260B
Xylenes (total)	ND	2.0	ug/L	SW846 8260B

SURROGATE	PERCENT RECOVERY	RECOVERY LIMITS
Dibromofluoromethane	89	(73 - 122)
1,2-Dichloroethane-d4	96	(61 - 128)
Toluene-d8	95	(76 - 110)
4-Bromofluorobenzene	80	(74 - 116)

NOTE(S):

Calculations are performed before rounding to avoid round-off errors in calculated results.

J Estimated result. Result is less than RL.

MI0013101

LABORATORY CONTROL SAMPLE DATA REPORT

GC/MS Volatiles

Client Lot #...: A6A170248 **Work Order #...:** HV1E01AC-LCS **Matrix.....:** WATER
LCS Lot-Sample#: A6A200000-044 HV1E01AD-LCSD
Prep Date.....: 01/19/06 **Analysis Date..:** 01/19/06
Prep Batch #...: 6020044
Dilution Factor: 1

PARAMETER	SPIKE AMOUNT	MEASURED AMOUNT	UNITS	PERCENT RECOVERY	RPD	METHOD
Acetone	10	9.5	ug/L	95		SW846 8260B
	10	10	ug/L	102	7.7	SW846 8260B
Benzene	**10**	**9.5**	**ug/L**	**95**		**SW846 8260B**
	10	**10**	**ug/L**	**101**	**6.8**	**SW846 8260B**
Bromodichloromethane	10	9.4	ug/L	94		SW846 8260B
	10	10	ug/L	100	6.1	SW846 8260B
Bromoform	10	8.6	ug/L	86		SW846 8260B
	10	9.1	ug/L	91	5.8	SW846 8260B
Bromomethane	10	12	ug/L	120		SW846 8260B
	10	13	ug/L	126	4.9	SW846 8260B
2-Butanone	10	9.4	ug/L	94		SW846 8260B
	10	11	ug/L	105	12	SW846 8260B
Carbon disulfide	10	9.2	ug/L	92		SW846 8260B
	10	9.8	ug/L	98	6.8	SW846 8260B
Carbon tetrachloride	10	9.7	ug/L	97		SW846 8260B
	10	10	ug/L	104	6.7	SW846 8260B
Chlorobenzene	**10**	**9.2**	**ug/L**	**92**		**SW846 8260B**
	10	**9.9**	**ug/L**	**99**	**7.9**	**SW846 8260B**
Chloroethane	10	10	ug/L	102		SW846 8260B
	10	11	ug/L	108	5.7	SW846 8260B
Chloroform	10	9.5	ug/L	95		SW846 8260B
	10	10	ug/L	102	7.0	SW846 8260B
Chloromethane	10	11	ug/L	107		SW846 8260B
	10	11	ug/L	112	4.4	SW846 8260B
Cyclohexane	10	9.1	ug/L	91		SW846 8260B
	10	9.5	ug/L	95	3.7	SW846 8260B
Dibromochloromethane	10	8.7	ug/L	87		SW846 8260B
	10	9.5	ug/L	95	9.0	SW846 8260B
1,2-Dibromo-3-chloro-propane	10	8.6	ug/L	86		SW846 8260B
	10	9.4	ug/L	94	8.5	SW846 8260B
1,2-Dibromoethane	10	9.7	ug/L	97		SW846 8260B
	10	11	ug/L	106	8.4	SW846 8260B
1,2-Dichlorobenzene	10	9.1	ug/L	91		SW846 8260B
	10	10	ug/L	100	9.2	SW846 8260B
1,3-Dichlorobenzene	10	9.1	ug/L	91		SW846 8260B
	10	10	ug/L	100	9.2	SW846 8260B
1,4-Dichlorobenzene	10	9.1	ug/L	91		SW846 8260B
	10	10	ug/L	100	9.3	SW846 8260B

(Continued on next page)

MI0013102

LABORATORY CONTROL SAMPLE DATA REPORT

GC/MS Volatiles

Client Lot #...: A6A170248 **Work Order #...:** HV1E01AC-LCS **Matrix.....:** WATER
LCS Lot-Sample#: A6A200000-044 HV1E01AD-LCSD

PARAMETER	SPIKE AMOUNT	MEASURED AMOUNT	UNITS	PERCENT RECOVERY	RPD	METHOD
Dichlorodifluoromethane	10	7.7	ug/L	77		SW846 8260B
	10	8.0	ug/L	80	3.9	SW846 8260B
1,1-Dichloroethane	10	9.8	ug/L	98		SW846 8260B
	10	11	ug/L	105	6.8	SW846 8260B
1,2-Dichloroethane	10	10	ug/L	104		SW846 8260B
	10	11	ug/L	111	6.1	SW846 8260B
1,1-Dichloroethene	**10**	**9.4**	**ug/L**	**94**		**SW846 8260B**
	10	**9.9**	**ug/L**	**99**	**5.0**	**SW846 8260B**
cis-1,2-Dichloroethene	10	9.1	ug/L	91		SW846 8260B
	10	9.8	ug/L	98	7.5	SW846 8260B
trans-1,2-Dichloroethene	10	9.2	ug/L	92		SW846 8260B
	10	9.8	ug/L	98	6.2	SW846 8260B
1,2-Dichloropropane	10	10	ug/L	102		SW846 8260B
	10	11	ug/L	109	6.4	SW846 8260B
cis-1,3-Dichloropropene	10	10	ug/L	102		SW846 8260B
	10	11	ug/L	109	7.4	SW846 8260B
trans-1,3-Dichloropropene	10	9.8	ug/L	98		SW846 8260B
	10	11	ug/L	109	11	SW846 8260B
Ethylbenzene	10	9.4	ug/L	94		SW846 8260B
	10	10	ug/L	103	9.3	SW846 8260B
2-Hexanone	10	9.0	ug/L	90		SW846 8260B
	10	9.7	ug/L	97	7.1	SW846 8260B
Isopropylbenzene	10	8.9	ug/L	89		SW846 8260B
	10	9.8	ug/L	98	9.8	SW846 8260B
Methyl acetate	10	10	ug/L	102		SW846 8260B
	10	11	ug/L	106	3.6	SW846 8260B
Methylene chloride	10	9.5	ug/L	95		SW846 8260B
	10	9.9	ug/L	99	3.8	SW846 8260B
Methylcyclohexane	10	8.7	ug/L	87		SW846 8260B
	10	9.3	ug/L	93	7.3	SW846 8260B
4-Methyl-2-pentanone	10	9.1	ug/L	91		SW846 8260B
	10	9.9	ug/L	99	7.6	SW846 8260B
Methyl tert-butyl ether (MTBE)	10	9.3	ug/L	93		SW846 8260B
	10	9.9	ug/L	99	6.7	SW846 8260B
Styrene	10	8.5	ug/L	85		SW846 8260B
	10	9.4	ug/L	94	9.7	SW846 8260B
1,1,2,2-Tetrachloroethane	10	10	ug/L	105		SW846 8260B
	10	11	ug/L	113	7.7	SW846 8260B
Tetrachloroethene	10	8.5 a	ug/L	85		SW846 8260B
	10	9.4	ug/L	94	10	SW846 8260B

(Continued on next page)

MI0013103

LABORATORY CONTROL SAMPLE DATA REPORT

GC/MS Volatiles

Client Lot #...: A6A170248 **Work Order #...:** HV1E01AC-LCS **Matrix.....:** WATER
LCS Lot-Sample#: A6A200000-044 HV1E01AD-LCSD

PARAMETER	SPIKE AMOUNT	MEASURED AMOUNT	UNITS	PERCENT RECOVERY	RPD	METHOD
Toluene	**10**	**9.1**	**ug/L**	**91**		**SW846 8260B**
	10	**9.9**	**ug/L**	**99**	**7.9**	**SW846 8260B**
1,2,4-Trichloro-benzene	10	8.2	ug/L	82		SW846 8260B
	10	9.1	ug/L	91	10	SW846 8260B
1,1,1-Trichloroethane	10	9.7	ug/L	97		SW846 8260B
	10	10	ug/L	102	5.4	SW846 8260B
1,1,2-Trichloroethane	10	9.6	ug/L	96		SW846 8260B
	10	10	ug/L	105	8.8	SW846 8260B
Trichloroethene	**10**	**9.3**	**ug/L**	**93**		**SW846 8260B**
	10	**10**	**ug/L**	**100**	**7.3**	**SW846 8260B**
Trichlorofluoromethane	10	12	ug/L	119		SW846 8260B
	10	12	ug/L	122	2.8	SW846 8260B
1,1,2-Trichloro-1,2,2-trifluoroethane	10	9.6	ug/L	96		SW846 8260B
	10	10	ug/L	102	6.0	SW846 8260B
Vinyl chloride	10	10	ug/L	101		SW846 8260B
	10	11	ug/L	109	7.2	SW846 8260B
Xylenes (total)	30	27	ug/L	89		SW846 8260B
	30	29	ug/L	97	8.5	SW846 8260B

SURROGATE	PERCENT RECOVERY	RECOVERY LIMITS
Dibromofluoromethane	94	(73 - 122)
	92	(73 - 122)
1,2-Dichloroethane-d4	103	(61 - 128)
	102	(61 - 128)
Toluene-d8	91	(76 - 110)
	92	(76 - 110)
4-Bromofluorobenzene	96	(74 - 116)
	95	(74 - 116)

NOTE(S):

Calculations are performed before rounding to avoid round-off errors in calculated results.

Bold print denotes control parameters

a Spiked analyte recovery is outside stated control limits.

LABORATORY CONTROL SAMPLE EVALUATION REPORT

GC/MS Volatiles

Client Lot #...: A6A170248 **Work Order #...:** HV1E01AC-LCS **Matrix.....:** WATER
LCS Lot-Sample#: A6A200000-044 HV1E01AD-LCSD
Prep Date.....: 01/19/06 **Analysis Date..:** 01/19/06
Prep Batch #...: 6020044
Dilution Factor: 1

PARAMETER	PERCENT RECOVERY	RECOVERY LIMITS	RPD	RPD LIMITS	METHOD
Acetone	95	(22 - 200)			SW846 8260B
	102	(22 - 200)	7.7	(0-95)	SW846 8260B
Benzene	**95**	**(80 - 116)**			**SW846 8260B**
	101	**(80 - 116)**	**6.8**	**(0-20)**	**SW846 8260B**
Bromodichloromethane	94	(87 - 130)			SW846 8260B
	100	(87 - 130)	6.1	(0-30)	SW846 8260B
Bromoform	86	(76 - 150)			SW846 8260B
	91	(76 - 150)	5.8	(0-30)	SW846 8260B
Bromomethane	120	(64 - 129)			SW846 8260B
	126	(64 - 129)	4.9	(0-30)	SW846 8260B
2-Butanone	94	(28 - 237)			SW846 8260B
	105	(28 - 237)	12	(0-65)	SW846 8260B
Carbon disulfide	92	(73 - 139)			SW846 8260B
	98	(73 - 139)	6.8	(0-30)	SW846 8260B
Carbon tetrachloride	97	(75 - 149)			SW846 8260B
	104	(75 - 149)	6.7	(0-30)	SW846 8260B
Chlorobenzene	**92**	**(76 - 117)**			**SW846 8260B**
	99	**(76 - 117)**	**7.9**	**(0-20)**	**SW846 8260B**
Chloroethane	102	(66 - 126)			SW846 8260B
	108	(66 - 126)	5.7	(0-30)	SW846 8260B
Chloroform	95	(84 - 128)			SW846 8260B
	102	(84 - 128)	7.0	(0-30)	SW846 8260B
Chloromethane	107	(48 - 123)			SW846 8260B
	112	(48 - 123)	4.4	(0-30)	SW846 8260B
Cyclohexane	91	(70 - 130)			SW846 8260B
	95	(70 - 130)	3.7	(0-30)	SW846 8260B
Dibromochloromethane	87	(81 - 138)			SW846 8260B
	95	(81 - 138)	9.0	(0-30)	SW846 8260B
1,2-Dibromo-3-chloro-propane	86	(70 - 130)			SW846 8260B
	94	(70 - 130)	8.5	(0-30)	SW846 8260B
1,2-Dibromoethane	97	(70 - 130)			SW846 8260B
	106	(70 - 130)	8.4	(0-30)	SW846 8260B
1,2-Dichlorobenzene	91	(70 - 130)			SW846 8260B
	100	(70 - 130)	9.2	(0-30)	SW846 8260B
1,3-Dichlorobenzene	91	(70 - 130)			SW846 8260B
	100	(70 - 130)	9.2	(0-30)	SW846 8260B
1,4-Dichlorobenzene	91	(70 - 130)			SW846 8260B
	100	(70 - 130)	9.3	(0-30)	SW846 8260B

(Continued on next page)

MI0013105

LABORATORY CONTROL SAMPLE EVALUATION REPORT

GC/MS Volatiles

Client Lot #...: A6A170248 **Work Order #...:** HV1E01AC-LCS **Matrix.....:** WATER
LCS Lot-Sample#: A6A200000-044 HV1E01AD-LCSD

PARAMETER	PERCENT RECOVERY	RECOVERY LIMITS	RPD	RPD LIMITS	METHOD
Dichlorodifluoromethane	77	(70 - 130)			SW846 8260B
	80	(70 - 130)	3.9	(0-30)	SW846 8260B
1,1-Dichloroethane	98	(86 - 123)			SW846 8260B
	105	(86 - 123)	6.8	(0-30)	SW846 8260B
1,2-Dichloroethane	104	(79 - 136)			SW846 8260B
	111	(79 - 136)	6.1	(0-30)	SW846 8260B
1,1-Dichloroethene	**94**	**(63 - 130)**			**SW846 8260B**
	99	**(63 - 130)**	**5.0**	**(0-20)**	**SW846 8260B**
cis-1,2-Dichloroethene	91	(85 - 113)			SW846 8260B
	98	(85 - 113)	7.5	(0-30)	SW846 8260B
trans-1,2-Dichloroethene	92	(80 - 120)			SW846 8260B
	98	(80 - 120)	6.2	(0-30)	SW846 8260B
1,2-Dichloropropane	102	(82 - 115)			SW846 8260B
	109	(82 - 115)	6.4	(0-30)	SW846 8260B
cis-1,3-Dichloropropene	102	(84 - 130)			SW846 8260B
	109	(84 - 130)	7.4	(0-30)	SW846 8260B
trans-1,3-Dichloropropene	98	(84 - 130)			SW846 8260B
	109	(84 - 130)	11	(0-30)	SW846 8260B
Ethylbenzene	94	(86 - 116)			SW846 8260B
	103	(86 - 116)	9.3	(0-30)	SW846 8260B
2-Hexanone	90	(35 - 200)			SW846 8260B
	97	(35 - 200)	7.1	(0-52)	SW846 8260B
Isopropylbenzene	89	(70 - 130)			SW846 8260B
	98	(70 - 130)	9.8	(0-30)	SW846 8260B
Methyl acetate	102	(70 - 130)			SW846 8260B
	106	(70 - 130)	3.6	(0-30)	SW846 8260B
Methylene chloride	95	(78 - 118)			SW846 8260B
	99	(78 - 118)	3.8	(0-30)	SW846 8260B
Methylcyclohexane	87	(70 - 130)			SW846 8260B
	93	(70 - 130)	7.3	(0-30)	SW846 8260B
4-Methyl-2-pentanone	91	(78 - 141)			SW846 8260B
	99	(78 - 141)	7.6	(0-32)	SW846 8260B
Methyl tert-butyl ether (MTBE)	93	(70 - 130)			SW846 8260B
	99	(70 - 130)	6.7	(0-30)	SW846 8260B
Styrene	85	(85 - 117)			SW846 8260B
	94	(85 - 117)	9.7	(0-30)	SW846 8260B
1,1,2,2-Tetrachloroethane	105	(85 - 118)			SW846 8260B
	113	(85 - 118)	7.7	(0-30)	SW846 8260B
Tetrachloroethene	85 a	(88 - 113)			SW846 8260B
	94	(88 - 113)	10	(0-30)	SW846 8260B

(Continued on next page)

MI0013106

LABORATORY CONTROL SAMPLE EVALUATION REPORT

GC/MS Volatiles

Client Lot #...: A6A170248 **Work Order #...:** HV1E01AC-LCS **Matrix.....:** WATER
LCS Lot-Sample#: A6A200000-044 HV1E01AD-LCSD

PARAMETER	PERCENT RECOVERY	RECOVERY LIMITS	RPD	RPD LIMITS	METHOD
Toluene	**91**	**(74 - 119)**			**SW846 8260B**
	99	**(74 - 119)**	**7.9**	**(0-20)**	**SW846 8260B**
1,2,4-Trichloro-benzene	82	(70 - 130)			SW846 8260B
	91	(70 - 130)	10	(0-30)	SW846 8260B
1,1,1-Trichloroethane	97	(78 - 140)			SW846 8260B
	102	(78 - 140)	5.4	(0-30)	SW846 8260B
1,1,2-Trichloroethane	96	(83 - 122)			SW846 8260B
	105	(83 - 122)	8.8	(0-30)	SW846 8260B
Trichloroethene	**93**	**(75 - 122)**			**SW846 8260B**
	100	**(75 - 122)**	**7.3**	**(0-20)**	**SW846 8260B**
Trichlorofluoromethane	119	(70 - 130)			SW846 8260B
	122	(70 - 130)	2.8	(0-30)	SW846 8260B
1,1,2-Trichloro-1,2,2-trifluoroethane	96	(70 - 130)			SW846 8260B
	102	(70 - 130)	6.0	(0-30)	SW846 8260B
Vinyl chloride	101	(61 - 120)			SW846 8260B
	109	(61 - 120)	7.2	(0-30)	SW846 8260B
Xylenes (total)	89	(87 - 116)			SW846 8260B
	97	(87 - 116)	8.5	(0-30)	SW846 8260B

SURROGATE	PERCENT RECOVERY	RECOVERY LIMITS
Dibromofluoromethane	94	(73 - 122)
	92	(73 - 122)
1,2-Dichloroethane-d4	103	(61 - 128)
	102	(61 - 128)
Toluene-d8	91	(76 - 110)
	92	(76 - 110)
4-Bromofluorobenzene	96	(74 - 116)
	95	(74 - 116)

NOTE(S):

Calculations are performed before rounding to avoid round-off errors in calculated results.

Bold print denotes control parameters

a Spiked analyte recovery is outside stated control limits.

MI0013107

LABORATORY CONTROL SAMPLE DATA REPORT

GC/MS Volatiles

Client Lot #...: A6A170248 **Work Order #...:** HV4FW1AC-LCS **Matrix.....:** WATER
LCS Lot-Sample#: A6A230000-048 HV4FW1AD-LCSD
Prep Date.....: 01/20/06 **Analysis Date..:** 01/20/06
Prep Batch #...: 6023048
Dilution Factor: 1

PARAMETER	SPIKE AMOUNT	MEASURED AMOUNT	UNITS	PERCENT RECOVERY	RPD	METHOD
Acetone	10	7.3	ug/L	73		SW846 8260B
	10	7.1	ug/L	71	3.7	SW846 8260B
Benzene	**10**	**9.2**	**ug/L**	**92**		**SW846 8260B**
	10	**9.8**	**ug/L**	**98**	**6.9**	**SW846 8260B**
Bromodichloromethane	10	8.7	ug/L	87		SW846 8260B
	10	9.4	ug/L	94	7.5	SW846 8260B
Bromoform	10	8.5	ug/L	85		SW846 8260B
	10	8.9	ug/L	89	4.6	SW846 8260B
Bromomethane	10	11	ug/L	110		SW846 8260B
	10	12	ug/L	121	9.5	SW846 8260B
2-Butanone	10	8.5	ug/L	85		SW846 8260B
	10	8.9	ug/L	89	5.2	SW846 8260B
Carbon disulfide	10	8.7	ug/L	87		SW846 8260B
	10	9.4	ug/L	94	7.7	SW846 8260B
Carbon tetrachloride	10	9.1	ug/L	91		SW846 8260B
	10	9.9	ug/L	99	7.9	SW846 8260B
Chlorobenzene	**10**	**9.3**	**ug/L**	**93**		**SW846 8260B**
	10	**9.8**	**ug/L**	**98**	**6.1**	**SW846 8260B**
Chloroethane	10	9.4	ug/L	94		SW846 8260B
	10	11	ug/L	106	12	SW846 8260B
Chloroform	10	9.0	ug/L	90		SW846 8260B
	10	9.6	ug/L	96	6.9	SW846 8260B
Chloromethane	10	9.8	ug/L	98		SW846 8260B
	10	11	ug/L	106	8.4	SW846 8260B
Cyclohexane	10	8.5	ug/L	85		SW846 8260B
	10	9.3	ug/L	93	8.6	SW846 8260B
Dibromochloromethane	10	8.5	ug/L	85		SW846 8260B
	10	9.1	ug/L	91	6.5	SW846 8260B
1,2-Dibromo-3-chloro-propane	10	8.7	ug/L	87		SW846 8260B
	10	8.7	ug/L	87	0.39	SW846 8260B
1,2-Dibromoethane	10	9.6	ug/L	96		SW846 8260B
	10	10	ug/L	101	4.8	SW846 8260B
1,2-Dichlorobenzene	10	9.6	ug/L	96		SW846 8260B
	10	10	ug/L	101	4.8	SW846 8260B
1,3-Dichlorobenzene	10	9.5	ug/L	95		SW846 8260B
	10	10	ug/L	101	6.7	SW846 8260B
1,4-Dichlorobenzene	10	9.4	ug/L	94		SW846 8260B
	10	10	ug/L	101	7.0	SW846 8260B

(Continued on next page)

LABORATORY CONTROL SAMPLE DATA REPORT

GC/MS Volatiles

Client Lot #...: A6A170248 **Work Order #...:** HV4FW1AC-LCS **Matrix.....:** WATER
LCS Lot-Sample#: A6A230000-048 HV4FW1AD-LCSD

PARAMETER	SPIKE AMOUNT	MEASURED AMOUNT	UNITS	PERCENT RECOVERY	RPD	METHOD
Dichlorodifluoromethane	10	7.2	ug/L	72		SW846 8260B
	10	7.7	ug/L	77	7.3	SW846 8260B
1,1-Dichloroethane	10	9.3	ug/L	93		SW846 8260B
	10	10	ug/L	101	8.1	SW846 8260B
1,2-Dichloroethane	10	9.7	ug/L	97		SW846 8260B
	10	10	ug/L	104	7.2	SW846 8260B
1,1-Dichloroethene	**10**	**8.9**	**ug/L**	**89**		**SW846 8260B**
	10	**9.6**	**ug/L**	**96**	**6.7**	**SW846 8260B**
cis-1,2-Dichloroethene	10	9.0	ug/L	90		SW846 8260B
	10	9.5	ug/L	95	5.8	SW846 8260B
trans-1,2-Dichloroethene	10	8.7	ug/L	87		SW846 8260B
	10	9.5	ug/L	95	8.9	SW846 8260B
1,2-Dichloropropane	10	9.7	ug/L	97		SW846 8260B
	10	10	ug/L	105	7.3	SW846 8260B
cis-1,3-Dichloropropene	10	9.7	ug/L	97		SW846 8260B
	10	11	ug/L	106	9.0	SW846 8260B
trans-1,3-Dichloropropene	10	10	ug/L	100		SW846 8260B
	10	11	ug/L	106	6.2	SW846 8260B
Ethylbenzene	10	9.7	ug/L	97		SW846 8260B
	10	10	ug/L	104	6.7	SW846 8260B
2-Hexanone	10	8.8	ug/L	88		SW846 8260B
	10	9.2	ug/L	92	4.7	SW846 8260B
Isopropylbenzene	10	9.4	ug/L	94		SW846 8260B
	10	9.7	ug/L	97	3.2	SW846 8260B
Methyl acetate	10	8.8	ug/L	88		SW846 8260B
	10	9.0	ug/L	90	2.2	SW846 8260B
Methylene chloride	10	8.7	ug/L	87		SW846 8260B
	10	9.4	ug/L	94	7.1	SW846 8260B
Methylcyclohexane	10	8.4	ug/L	84		SW846 8260B
	10	8.9	ug/L	89	6.1	SW846 8260B
4-Methyl-2-pentanone	10	8.4	ug/L	84		SW846 8260B
	10	8.8	ug/L	88	4.5	SW846 8260B
Methyl tert-butyl ether (MTBE)	10	8.8	ug/L	88		SW846 8260B
	10	9.3	ug/L	93	5.4	SW846 8260B
Styrene	10	8.6	ug/L	86		SW846 8260B
	10	9.2	ug/L	92	6.3	SW846 8260B
1,1,2,2-Tetrachloroethane	10	10	ug/L	104		SW846 8260B
	10	11	ug/L	114	9.3	SW846 8260B
Tetrachloroethene	10	8.8	ug/L	88		SW846 8260B
	10	9.5	ug/L	95	7.6	SW846 8260B

(Continued on next page)

LABORATORY CONTROL SAMPLE DATA REPORT

GC/MS Volatiles

Client Lot #...: A6A170248 **Work Order #...:** HV4FW1AC-LCS **Matrix.....:** WATER
LCS Lot-Sample#: A6A230000-048 HV4FW1AD-LCSD

PARAMETER	SPIKE AMOUNT	MEASURED AMOUNT	UNITS	PERCENT RECOVERY	RPD	METHOD
Toluene	**10**	**9.2**	**ug/L**	**92**		**SW846 8260B**
	10	**10**	**ug/L**	**101**	**9.0**	**SW846 8260B**
1,2,4-Trichloro-benzene	10	8.8	ug/L	88		SW846 8260B
	10	8.1	ug/L	81	7.7	SW846 8260B
1,1,1-Trichloroethane	10	9.0	ug/L	90		SW846 8260B
	10	9.7	ug/L	97	7.7	SW846 8260B
1,1,2-Trichloroethane	10	9.5	ug/L	95		SW846 8260B
	10	10	ug/L	103	7.4	SW846 8260B
Trichloroethene	**10**	**9.1**	**ug/L**	**91**		**SW846 8260B**
	10	**9.9**	**ug/L**	**99**	**7.9**	**SW846 8260B**
Trichlorofluoromethane	10	11	ug/L	106		SW846 8260B
	10	12	ug/L	117	9.9	SW846 8260B
1,1,2-Trichloro-1,2,2-trifluoroethane	10	9.4	ug/L	94		SW846 8260B
	10	10	ug/L	101	6.9	SW846 8260B
Vinyl chloride	10	9.8	ug/L	98		SW846 8260B
	10	11	ug/L	106	7.6	SW846 8260B
Xylenes (total)	30	28	ug/L	92		SW846 8260B
	30	29	ug/L	97	5.6	SW846 8260B

SURROGATE	PERCENT RECOVERY	RECOVERY LIMITS
Dibromofluoromethane	90	(73 - 122)
	90	(73 - 122)
1,2-Dichloroethane-d4	94	(61 - 128)
	92	(61 - 128)
Toluene-d8	93	(76 - 110)
	93	(76 - 110)
4-Bromofluorobenzene	92	(74 - 116)
	86	(74 - 116)

NOTE(S):

Calculations are performed before rounding to avoid round-off errors in calculated results.

Bold print denotes control parameters

LABORATORY CONTROL SAMPLE EVALUATION REPORT

GC/MS Volatiles

Client Lot #...: A6A170248 **Work Order #...:** HV4FW1AC-LCS **Matrix.....:** WATER
LCS Lot-Sample#: A6A230000-048 HV4FW1AD-LCSD
Prep Date.....: 01/20/06 **Analysis Date..:** 01/20/06
Prep Batch #...: 6023048
Dilution Factor: 1

PARAMETER	PERCENT RECOVERY	RECOVERY LIMITS	RPD	RPD LIMITS	METHOD
Acetone	73	(22 - 200)			SW846 8260B
	71	(22 - 200)	3.7	(0-95)	SW846 8260B
Benzene	**92**	**(80 - 116)**			**SW846 8260B**
	98	**(80 - 116)**	**6.9**	**(0-20)**	**SW846 8260B**
Bromodichloromethane	87	(87 - 130)			SW846 8260B
	94	(87 - 130)	7.5	(0-30)	SW846 8260B
Bromoform	85	(76 - 150)			SW846 8260B
	89	(76 - 150)	4.6	(0-30)	SW846 8260B
Bromomethane	110	(64 - 129)			SW846 8260B
	121	(64 - 129)	9.5	(0-30)	SW846 8260B
2-Butanone	85	(28 - 237)			SW846 8260B
	89	(28 - 237)	5.2	(0-65)	SW846 8260B
Carbon disulfide	87	(73 - 139)			SW846 8260B
	94	(73 - 139)	7.7	(0-30)	SW846 8260B
Carbon tetrachloride	91	(75 - 149)			SW846 8260B
	99	(75 - 149)	7.9	(0-30)	SW846 8260B
Chlorobenzene	**93**	**(76 - 117)**			**SW846 8260B**
	98	**(76 - 117)**	**6.1**	**(0-20)**	**SW846 8260B**
Chloroethane	94	(66 - 126)			SW846 8260B
	106	(66 - 126)	12	(0-30)	SW846 8260B
Chloroform	90	(84 - 128)			SW846 8260B
	96	(84 - 128)	6.9	(0-30)	SW846 8260B
Chloromethane	98	(48 - 123)			SW846 8260B
	106	(48 - 123)	8.4	(0-30)	SW846 8260B
Cyclohexane	85	(70 - 130)			SW846 8260B
	93	(70 - 130)	8.6	(0-30)	SW846 8260B
Dibromochloromethane	85	(81 - 138)			SW846 8260B
	91	(81 - 138)	6.5	(0-30)	SW846 8260B
1,2-Dibromo-3-chloro-propane	87	(70 - 130)			SW846 8260B
	87	(70 - 130)	0.39	(0-30)	SW846 8260B
1,2-Dibromoethane	96	(70 - 130)			SW846 8260B
	101	(70 - 130)	4.8	(0-30)	SW846 8260B
1,2-Dichlorobenzene	96	(70 - 130)			SW846 8260B
	101	(70 - 130)	4.8	(0-30)	SW846 8260B
1,3-Dichlorobenzene	95	(70 - 130)			SW846 8260B
	101	(70 - 130)	6.7	(0-30)	SW846 8260B
1,4-Dichlorobenzene	94	(70 - 130)			SW846 8260B
	101	(70 - 130)	7.0	(0-30)	SW846 8260B

(Continued on next page)

MI0013111

LABORATORY CONTROL SAMPLE EVALUATION REPORT

GC/MS Volatiles

Client Lot #...: A6A170248 **Work Order #...:** HV4FW1AC-LCS **Matrix.....:** WATER
LCS Lot-Sample#: A6A230000-048 HV4FW1AD-LCSD

PARAMETER	PERCENT RECOVERY	RECOVERY LIMITS	RPD	RPD LIMITS	METHOD
Dichlorodifluoromethane	72	(70 - 130)			SW846 8260B
	77	(70 - 130)	7.3	(0-30)	SW846 8260B
1,1-Dichloroethane	93	(86 - 123)			SW846 8260B
	101	(86 - 123)	8.1	(0-30)	SW846 8260B
1,2-Dichloroethane	97	(79 - 136)			SW846 8260B
	104	(79 - 136)	7.2	(0-30)	SW846 8260B
1,1-Dichloroethene	**89**	**(63 - 130)**			**SW846 8260B**
	96	**(63 - 130)**	**6.7**	**(0-20)**	**SW846 8260B**
cis-1,2-Dichloroethene	90	(85 - 113)			SW846 8260B
	95	(85 - 113)	5.8	(0-30)	SW846 8260B
trans-1,2-Dichloroethene	87	(80 - 120)			SW846 8260B
	95	(80 - 120)	8.9	(0-30)	SW846 8260B
1,2-Dichloropropane	97	(82 - 115)			SW846 8260B
	105	(82 - 115)	7.3	(0-30)	SW846 8260B
cis-1,3-Dichloropropene	97	(84 - 130)			SW846 8260B
	106	(84 - 130)	9.0	(0-30)	SW846 8260B
trans-1,3-Dichloropropene	100	(84 - 130)			SW846 8260B
	106	(84 - 130)	6.2	(0-30)	SW846 8260B
Ethylbenzene	97	(86 - 116)			SW846 8260B
	104	(86 - 116)	6.7	(0-30)	SW846 8260B
2-Hexanone	88	(35 - 200)			SW846 8260B
	92	(35 - 200)	4.7	(0-52)	SW846 8260B
Isopropylbenzene	94	(70 - 130)			SW846 8260B
	97	(70 - 130)	3.2	(0-30)	SW846 8260B
Methyl acetate	88	(70 - 130)			SW846 8260B
	90	(70 - 130)	2.2	(0-30)	SW846 8260B
Methylene chloride	87	(78 - 118)			SW846 8260B
	94	(78 - 118)	7.1	(0-30)	SW846 8260B
Methylcyclohexane	84	(70 - 130)			SW846 8260B
	89	(70 - 130)	6.1	(0-30)	SW846 8260B
4-Methyl-2-pentanone	84	(78 - 141)			SW846 8260B
	88	(78 - 141)	4.5	(0-32)	SW846 8260B
Methyl tert-butyl ether (MTBE)	88	(70 - 130)			SW846 8260B
	93	(70 - 130)	5.4	(0-30)	SW846 8260B
Styrene	86	(85 - 117)			SW846 8260B
	92	(85 - 117)	6.3	(0-30)	SW846 8260B
1,1,2,2-Tetrachloroethane	104	(85 - 118)			SW846 8260B
	114	(85 - 118)	9.3	(0-30)	SW846 8260B
Tetrachloroethene	88	(88 - 113)			SW846 8260B
	95	(88 - 113)	7.6	(0-30)	SW846 8260B

(Continued on next page)

LABORATORY CONTROL SAMPLE EVALUATION REPORT

GC/MS Volatiles

Client Lot #...: A6A170248 **Work Order #...:** HV4FW1AC-LCS **Matrix.....:** WATER
LCS Lot-Sample#: A6A230000-048 HV4FW1AD-LCSD

PARAMETER	PERCENT RECOVERY	RECOVERY LIMITS	RPD	RPD LIMITS	METHOD
Toluene	**92**	**(74 - 119)**			**SW846 8260B**
	101	**(74 - 119)**	**9.0**	**(0-20)**	**SW846 8260B**
1,2,4-Trichloro-benzene	88	(70 - 130)			SW846 8260B
	81	(70 - 130)	7.7	(0-30)	SW846 8260B
1,1,1-Trichloroethane	90	(78 - 140)			SW846 8260B
	97	(78 - 140)	7.7	(0-30)	SW846 8260B
1,1,2-Trichloroethane	95	(83 - 122)			SW846 8260B
	103	(83 - 122)	7.4	(0-30)	SW846 8260B
Trichloroethene	**91**	**(75 - 122)**			**SW846 8260B**
	99	**(75 - 122)**	**7.9**	**(0-20)**	**SW846 8260B**
Trichlorofluoromethane	106	(70 - 130)			SW846 8260B
	117	(70 - 130)	9.9	(0-30)	SW846 8260B
1,1,2-Trichloro-1,2,2-trifluoroethane	94	(70 - 130)			SW846 8260B
	101	(70 - 130)	6.9	(0-30)	SW846 8260B
Vinyl chloride	98	(61 - 120)			SW846 8260B
	106	(61 - 120)	7.6	(0-30)	SW846 8260B
Xylenes (total)	92	(87 - 116)			SW846 8260B
	97	(87 - 116)	5.6	(0-30)	SW846 8260B

SURROGATE	PERCENT RECOVERY	RECOVERY LIMITS
Dibromofluoromethane	90	(73 - 122)
	90	(73 - 122)
1,2-Dichloroethane-d4	94	(61 - 128)
	92	(61 - 128)
Toluene-d8	93	(76 - 110)
	93	(76 - 110)
4-Bromofluorobenzene	92	(74 - 116)
	86	(74 - 116)

NOTE(S):

Calculations are performed before rounding to avoid round-off errors in calculated results.

Bold print denotes control parameters

MI0013114

CONESTOGA-ROVERS & ASSOCIATES

CHAIN-OF-CUSTODY / Analytical Request Document

The Chain-of-Custody is a LEGAL DOCUMENT All relevant fields must be completed accurately.

PAGE 1 OF 1

ID # № D 1640

SSOW Ref. Code: 35-298-SSOW-004

Required Client Information:

Company: CRA, Inc.	Report To: Paul Wiseman
Address: 14496 Sheldon Rd.	Copy To:
Suite 200	Invoice To:
Plymouth, MI 48170	P.O.:
Phone: 734-453-5123	Project Name: Eagle Picher
Fax: 734-453-5201	Project Number: 35-298
Email:	

Laboratory:	STL
Laboratory Location:	North Canton
Laboratory Contact:	Denise Hatcher
Requested Due Date:	TAT: Std
QA/QC Requirements:	

Valid Matrix Codes: WG Groundwater; WB Borehole Water; WS Surface Water; SO Soil; SE Sediment; See Back for Additional Codes

Analysis and Method

Sample Identification:	Matrix Code	Date Collected	Time Collected	# Containers	Unpreserved	HCl	H2SO4	HNO3	NaOH	Other:	VOC	Remarks/Lab ID
GW-35298-011606-JY-054	WG	1-16-06	1050	3		X					X	
-055			1026	3		X					X	
-056			1124	3		X					X	
-057			1150	3		X					X	
-058			1211	3		X					X	
-059			1330	3		X					X	
-060			1326	3		X					X	
-061			1436	3		X					X	
-062			1445	3		X					X	
-063			1530	3		X					X	
-064			1526	3		X					X	
TB-35298-011606-JY-065			—	1		X					X	
End of Batch!												
TOTAL NUMBER OF CONTAINERS												

SHIPMENT METHOD	NO. OF COOLERS	RELINQUISHED BY / AFFILIATION	DATE	TIME	RECEIVED BY / AFFILIATION	DATE	TIME
Fed Ex.	1	John York	1-16-06	1800	Jim Maddump STL	1/17/06	9:00am
AIRBILL NO. 6741 0648 9163							

Sample Condition

Temp in C	
Received on Ice	Y N
Sealed Cooler	Y N
Samples Intact	Y N

Additional Comments:

Sampler Name: John York, Evan V.

Sampler Signature: John York Date: 1-16-06

STL North Canton

Distribution: WHITE - Fully Executed Copy YELLOW - Receiving Laboratory Copy PINK - Shipper GOLDENROD - Sampler Copy

REV. 01/04

STL Cooler Receipt Form/Narrative **Lot Number:** A6A170048
North Canton Facility

Client: CRA Project: Eagle Pitcher Quote#: 66859
Cooler Received on: 1/17/06 Opened on: 1/17/06 by: [signature] (Signature)
Fedx [X] Client Drop Off [ ] UPS [ ] DHL [ ] FAS [ ] STL Courier [ ]
Stetson [ ] US Cargo [ ] Other: _____
STL Cooler No# 648 Foam Box [ ] Client Cooler [ ] Other _____

1. Were custody seals on the outside of the cooler? Yes [ ] No [X] Intact? Yes [ ] No [ ] NA [X]
   If YES, Quantity _____
   Were the custody seals signed and dated? Yes [ ] No [ ] NA [X]
2. Shipper's packing slip attached to this form? Yes [X] No [ ] NA [ ]
3. Did custody papers accompany the samples? Yes [X] No [ ] Relinquished by client? Yes [X] No [ ]
4. Did you sign the custody papers in the appropriate place? Yes [X] No [ ]
5. Packing material used: Bubble Wrap [X] Foam [X] None [ ] Other: _____
6. Cooler temperature upon receipt 2.9 °C (see back of form for multiple coolers/temp)

METHOD: Temp Vial [ ] Coolant & Sample [ ] Against Bottles [ ] IR [X] ICE/H_2O Slurry [ ]
COOLANT: Wet Ice [X] Blue Ice [ ] Dry Ice [ ] Water [ ] None [ ]

7. Did all bottles arrive in good condition (Unbroken)? Yes [X] No [ ]
8. Could all bottle labels and/or tags be reconciled with the COC? Yes [X] No [ ]
9. Were samples at the correct pH? (record below/on back) Yes [ ] No [ ] NA [X]
10. Were correct bottles used for the tests indicated? Yes [X] No [ ]
11. Were air bubbles >6 mm in any VOA vials? Yes [ ] No [X] NA [ ]
12. Sufficient quantity received to perform indicated analyses? Yes [X] No [ ]
13. Was a Trip Blank present in the cooler? Yes [X] No [ ] Were VOAs on the COC? Yes [X] No [ ]
14. Does the trip blank number match the cooler number in which it was received? Yes [ ] No [X] NA [ ]

Contacted PM _____ Date: _____ by: _____ via Voice Mail [ ] Verbal [ ] Other [ ]
Concerning: _____

√	
	1. CHAIN OF CUSTODY
	The following discrepancies occurred: _____
	2. SAMPLE CONDITION
	Sample(s) _____ were received after the recommended holding time had expired.
	Sample(s) _____ were received in a broken container.
	3. SAMPLE PRESERVATION
	Sample(s) _____ were further preserved in sample receiving to meet recommended pH level(s). *Nitric Acid Lot # 100405-HNO3; Sulfuric Acid Lot # 100405-H2SO4; Sodium Hydroxide Lot # -100405 -NaOH; Hydrochloric Acid Lot # 100504-HCl; Sodium Hydroxide and Zinc Acetate Lot # 071604-CH3COO2ZN/NaOH*
	Sample(s) _____ were received with bubble > 6 mm in diameter (cc: PM)
	4. Other (see below or back)

Client ID	pH	Date	Initials

STL Cooler Receipt Form/Narrative
North Canton Facility

Client ID	pH	Date	Initials

Cooler	Temp	Method	Coolant

Discrepancies Cont.

SEVERN TRENT STL

END OF REPORT

MI0013117

EaglePicher™ Automotive

April 7, 2006

Reference No. 42354

Ms. Pauline Mapp
Law Department, Box 241
Norfolk Southern Corporation
Three Commercial Place
Norfolk, Virginia 23510

Dear Ms. Mapp:

Re: Notice of Migration of Contamination
2638 Princess Street
Inkster, Michigan 48141

I am writing to you to inform you that EaglePicher is currently working with the Michigan Department of Environmental Quality (MDEQ) to cleanup the groundwater at their facility located at 2638 Princess Street Inkster, Michigan. EaglePicher has detected certain volatile organic compounds (VOCs) in the shallow soil and perched groundwater beneath the facility. The perched groundwater exists at a depth range of about 3 to 9 feet below ground level. Based on samples that EaglePicher collected from groundwater monitoring well MWO-02, benzene and chlorobenzene are present at levels indicating these constituents have migrated onto your property or right of way at levels exceeding the MDEQ's criteria identified in MCL 324.20120a(1)(a). EaglePicher is providing you with the enclosed notice form regarding the migration of VOCs in groundwater in accordance with the requirements of applicable state laws.

Please note that EaglePicher has provided the enclosed notice to the MDEQ and will be working with the MDEQ to define and take any appropriate actions that are required to meet applicable standards for shallow groundwater containing VOCs.

2424 John Daly Road; Inkster, Michigan 48141
(313) 278-5956, (313) 278-3546 fax

42354Mapp NOM letter

EaglePicher™ Automotive

In the meantime, if you have any questions regarding EaglePichers's environmental study, please contact me at (313) 724-2006.

Yours truly,

EaglePicher Automotive,

Doug Rommeck, Manager – Health, Safety and Environment

TMK/1/Det.
Encl.

2424 John Daly Road; Inkster, Michigan 48141
(313) 278-5956, (313) 278-3546 fax

42354Mapp NOM letter

MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
REMEDIATION AND REDEVELOPMENT DIVISION

For DEQ Use Only
ITS # _____
Site ID #_____
Category Code: _____

NOTICE OF MIGRATION OF CONTAMINATION

(Under the authority of Part 201, Natural Resources and Environmental Protection Act, 1994 Act 451, as amended, (NREPA) and the Rules promulgated thereunder)

An owner or operator of property that is a facility, and/or who is subject to MCL 324.20114, and who has reason to believe that a hazardous substance is emanating from, has emanated from, or is likely to be emanating from the property and migrating beyond the boundaries of the property that he or she owns or operates is required under R 299.5522 and R 299.51017(1) to notify the Michigan Department of Environmental Quality ("DEQ") and affected property owners, unless he or she is exempt from MCL 324.20107a (see MCL 324.20107a(4) for exemptions), or unless he or she has provided the notice required by MCL 324.21309a. Submission of this notice does not fulfill the notification requirements of MCL324.21309a.

The notice must be provided within 45 days after the owner or operator has reason to believe that hazardous substances have migrated, or are likely to have migrated, to or beyond the boundary of his or her property (see R 299.51017 and R 299.5522 for exceptions). If a person is required to provide additional notice as a result of the changes in R 299.51017 that took effect on December 21, 2002, then that additional notice shall be provided not later than September 21, 2003.

Use of this form is mandatory for the notice required by R 299.51017(1) and may also be used by parties subject to MCL 324.20114 to provide notice required by R 299.5522. This form may also be used to provide notice to affected property owners as required by those rules.

If a person holds a permit for an oil and gas well under Part 615, Supervisor of Wells, of the NREPA and there is a release from the oil and gas exploration or production activities, that person shall give notice to the DEQ and to the owner of the surface rights of the property.

If a person holds an easement and there is a release from the easement holder's activities, that person shall provide notice to the DEQ and to the grantor of the easement, or the grantor's successor in interest, if any.

Completing this notice in no way relieves a person who is subject to MCL 324.20114 from the responsibility to undertake required response activities.

This notice must be sent to the DEQ office that serves the county in which the property is located. A list of DEQ offices is available at www.michigan.gov/bea, or by calling the Remediation and Redevelopment's Lansing office at 517-373-9837. The DEQ will not prepare acknowledgement of receipt of these notices. The sender is responsible for sending the report using a method that provides proof of delivery if such proof is desired. Please label the outside of the envelope "Migration Notice." Additional guidelines for the compliance with the requirements of R 200.51017(1) or R 299.5522 are available at www.michigan.gov/bea.

THIS NOTICE IS PROVIDED PURSUANT TO: **R 299.5522** ☒ **R 299.51017** ☒
(check both, if applicable)

Please provide the following information as completely as possible.

1. Name and location of the property that hazardous substances are emanating from:

   Name: EaglePicher Automotive
   Address: 2638 Princess Street
   Location:
   City/County: Inkster / Wayne
   Property Tax Identification Number, or if applicable, the ward and item number: 021 99 0010 001 & 021 99 0010 707

2. Status relative to the property:
   (Check one or both, as applicable.)

   Owner ☒
   Operator ☒

Provide any additional ID numbers associated with the property (e.g., EPA ID No., BEA No., Part 213 facility ID No., etc.):

MI0013120

3. Name, address, and telephone number of the property owner, operator, or other party submitting the notice:
   Name: EaglePicher Automotive
   Address: 2638 Princess Street
   City/State: Inkster / MIchigan
   Telephone number: (313) 724-2006

4. Name, address and telephone number of a contact person familiar with the content of the notice:
   Name: Tom Kinney of Conestoga-Rovers and Associates, Inc. (CRA)
   Address: 14496 N. Sheldon Road
   City/State: Plymouth / MI
   Telephone: (734) 453-5123

5. If this Notice is provided pursuant to R 299.51017, provide the address and other location information for the *adjacent* property(s) onto which contamination is migrating, has migrated, or is likely to migrate. If this Notice is provided pursuant to R 299.5522, provide the address and other location information for *each* property onto which contamination has migrated. Notice should be sent to the property owner of record. If the impacted property is owned by the State of Michigan, notice should be sent to the department managing the property (i.e. a prison, state park, etc.). Notices to the Michigan Department of Transportation (MDOT) for state owned roadways should be sent to Ms. Heather Hicks, MDOT-Bureau of Transportation Planning, 425 W. Ottawa Street, P.O. Box 30050, Lansing, MI 48989. If it isn't readily apparent what state department manages the property, notices should be sent to Mr. Thomas Saxton, Tenant and Land Services, Department of Management and Budget, 1st Floor Lewis-Cass Building, P.O. Box 30026, Lansing, MI 48909.

Address: 2640 Princess St.
City/State: Inkster / MI 48141
Property Tax ID number: 021 99 0010 706
Other: Richwall Custom Cabinetry

Notified? No ☐ Yes ☒ Date: April 7, 2006

Address: 8505 Terra Bella Dr.
City/State: Northville / MI 48167
Property Tax ID number: 021 99 0010 004
Other: Prep LLC

Notified? No ☐ Yes ☒ Date: April 7, 2006

Address: 535 Berwyn
City/State: Dearborn Heights / MI 48127
Property Tax ID number: 021 99 0010 005
Other: Asard, John

Notified? No ☐ Yes ☒ Date: April 7, 2006

Address: Ms. Pauline Mapp
Law Department, Box 241
Norfolk Southern Corporation
Three Commercial Place
City/State: Norfolk, Virginia 23510
Property Tax ID number: 021 99 0008 000

Notified? No ☐ Yes ☒ Date: April 7, 2006

Address:
City/State:
Property Tax ID number:
Other:

Notified? No ☐ Yes ☐ Date:

(Attach additional pages as needed)

6. Complete the Table on Page 3 of this Form for each hazardous substance which has migrated, or is likely to have migrated, beyond the property boundary at a concentration that exceeds a Generic Residential Cleanup Criterion developed by the DEQ pursuant to MCL 324.20120a(1). Complete and attach additional copies of Page 3, if necessary, to list all hazardous substances that must be reported. Include a scaled map or drawing that shows the location of sampling points identified on the Table on Page 3, the property boundaries, and the adjacent property owners if providing notice pursuant to R 299.1017(1) or all impacted property owners if providing notice pursuant to Rule 299.5522.

7. Provide a summary of the information which shows that contamination is emanating from, or has emanated from, and is present beyond the boundary of the source property at a concentration which exceeds that allowed by MCL 324.20120a(1)(a). This summary shall identify the environmental media affected, specific hazardous substances, and the concentrations of those hazardous substances in all affected environmental media at the property boundary and in any sample locations beyond the property boundary. The summary shall also describe the basis for the conclusion that the contamination is emanating, has emanated, or is present beyond the boundary of the source property, including whether the conclusion is based on groundwater analytical data or fate and transport modeling, both, or neither.

   Based on analytical data from groundwater samples that EaglePicher collected at their Wolverine Gasket, Inkster facility, shallow perched groundwater containing benzene (10 ug/l) and chlorbenzene (510 ug/l) has migrated off-site to the south (MWO-02). Additionally, a well (MW-9) less than 30 feet from the western property boundary has benzene (31,000 ug/l) and chlorbenzene (4,900 ug/l) indicating these constituents may be present in the groundwater to the west of the facility at levels exceeding MCL 324.20120a(1)(a). Additionally, a well (MW-8) less than 15 feet from the north-northwest property boundary has benzene (46 ug/l) and chlorbenzene (910 ug/l) indicating these constituents may have migrated off-site to the north-northwest at levels exceeding MCL 324.20120a(1)(a).

8. If the person making this notice has reason to believe that a migrating hazardous substance has affected, or is likely to affect, a private or public water supply, then that water supply must be identified here: ***Not applicable***

	YES	NO
9. Is this notice being submitted within the timeframes established under R 299.5522 and/or R 299.51017, as applicable?	☒	☐
10. Is this notice in addition to a notice submitted prior to *December 21, 2002?* (R 299.51017(4)(c))	☐	☒
11. Is this notice related to an oil and gas well permit (R 299.51017(2))? Permit #:	☐	☒
12. Is this notice related to an easement (R 299.51017(3))? (NOTE: All easement grantors *must* receive this notice.)	☐	☒
13. Has surface water been affected (R 299.51017(1) and R 299.5522(2))? (If yes, please identify the affected surface water body.)	☐	☒

CERTIFICATION:

With my signature below, I certify that I am the owner of the facility or that I am legally authorized to execute this notice on behalf of the owner or operator named on this form, and that to the best of my knowledge and belief the above representations are complete and accurate. I understand that intentionally submitting false information to the DEQ is a felony and may result in fines up to $25,000 for each violation.

Signature _____ Date _____
(Owner or person legally authorized to bind the person making this report)

Name (Typed or Printed) _____

Title (Typed or Printed) _____

See Item 6 on Page 2 of this Form for instructions to be used in completing this Table. Attach additional pages if necessary. The information to be included in each column of the Table is:

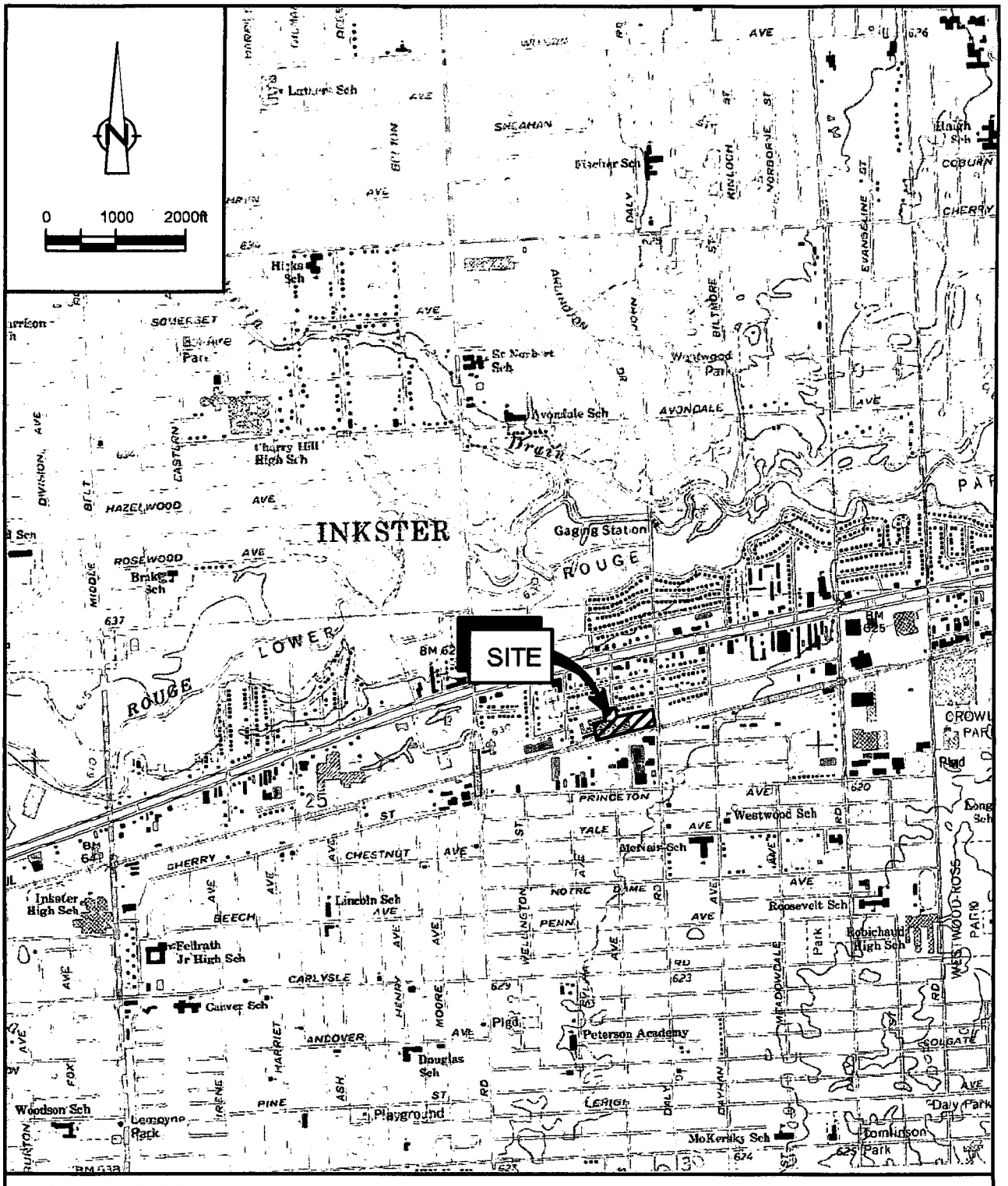
Column A Name of hazardous substance.
Column B Chemical Abstract Service (CAS) Number for the hazardous substance.
Column C Maximum hazardous substance concentration measured on the property, expressed in parts per billion (e.g., ug/L or ug/Kg). Report maximum concentration separately for each environmental medium.
Column D Sample location for Column C (relate to label on map).
Column E Environmental medium in which concentration reported in Column C was measured (e.g., soil or groundwater).
Column F Distance from point of maximum measured concentration (Column D) to property boundary, in direction of contaminant migration, if direction is known or can reasonably be inferred. If direction is unknown, list distance to nearest property boundary.
Column G Direction of contaminant migration, if known.
Column H Concentration closest to property boundary, if known. If a concentration lower than the maximum concentration reported in Column C has been measured at a point closer to the property boundary in the direction of contaminant migration, use Column I to list the concentration that was measured closest to the property boundary in the direction of contaminant migration.
Column I Sample location for Column H (relate to label on map).
Column J Environmental medium for measurement reported in Column H, if applicable.

A Hazardous Substance	B CAS Number	C Maximum Concentration ug/l	D Sample Location for "C"	E Environmental Medium for "C"	F Distance to Property Boundary	G Direction of Migration	H Boundary Concentration ug/l	I Sample Location for "H"	J Environmental Medium for "H"
Benzene	71432	41,000	MW102-05	Groundwater	110 feet	Variable Depending on Season	10	MWO-02	Groundwater
Chlorobenzene	108907	110,000	MW102-05	Groundwater	110 feet	Variable Depending on Season	510	MWO-02	Groundwater
Ethylbenzene	100414	4,700	MW102-05	Groundwater	110 feet	Variable Depending on Season	Non-detect	MWO-02	Groundwater
Toluene	108883	9,700	MW-7	Groundwater	130 feet	Variable Depending on Season	Non-detect	MWO-02	Groundwater
Xylenes	1330207	19,000	MW102-05	Groundwater	110 feet	Variable Depending on Season	Non-detect	MWO-02	Groundwater
MEK	78933	17,000	MW102-05	Groundwater	110 feet	Variable Depending on Season	Non-detect	MWO-02	Groundwater

Total Number Samples Collected: 44 collected since 6/04 Total Number of Samples Exceeding Criteria: 31

A scaled map or drawing showing these locations and the property boundaries must be submitted with this Notice

MI0013123



SOURCE: USGS QUADRANGLE MAP;
INKSTER, MICHIGAN

figure 1

SITE LOCATION
EAGLEPICHER - WOLVERINE GASKET
Inkster, Michigan

42354-07(MDEQ001)GN-DE001 MAR 31/2006

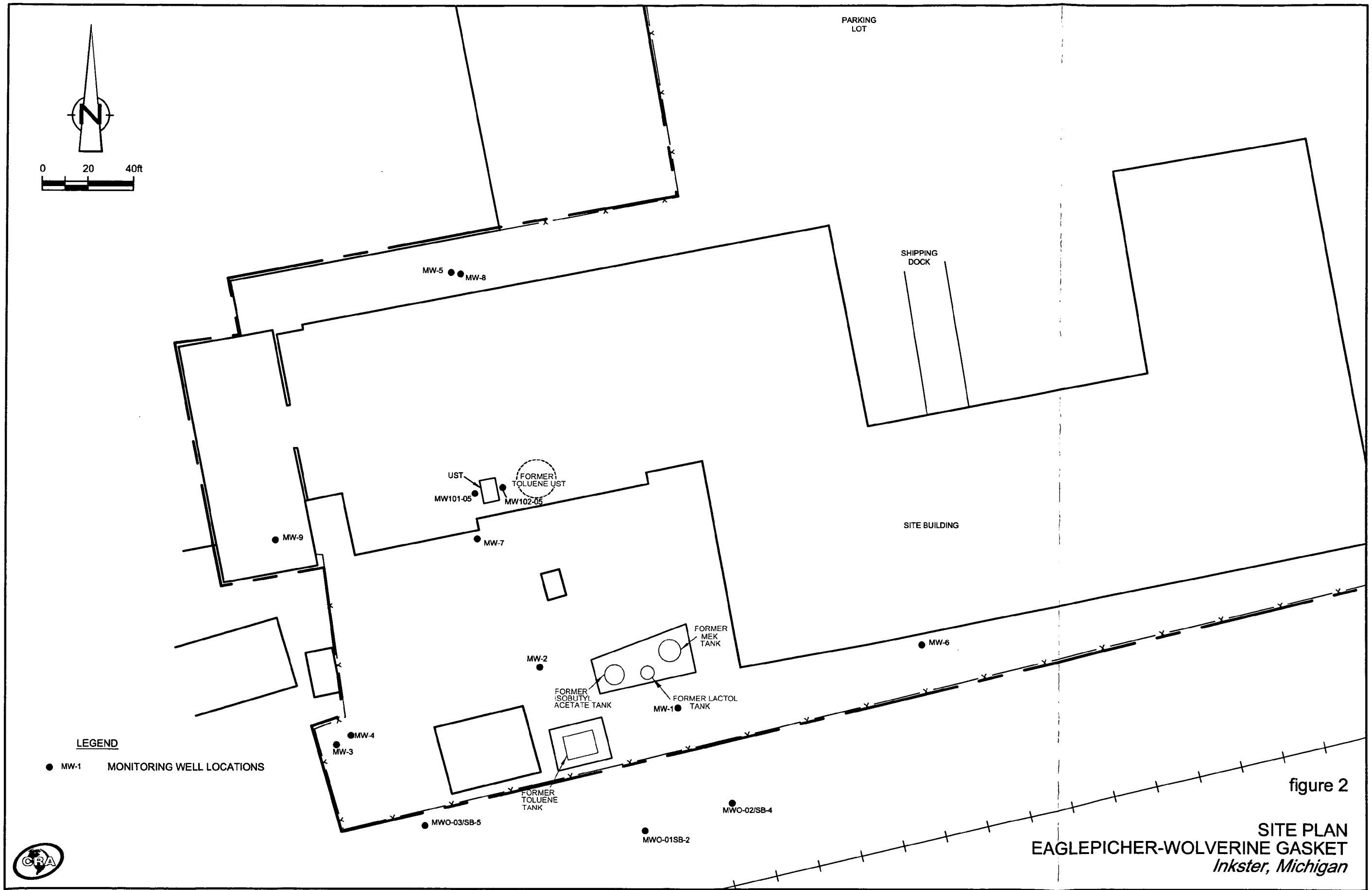


figure 2

SITE PLAN
EAGLEPICHER-WOLVERINE GASKET
Inkster, Michigan

42354-04(MDEQ001)GN-DE001 APR 07/2006

MI00013125

EaglePicher™ Automotive

April 7, 2006

Reference No. 42354

John Asard
535 Berwyn
Dearborn Heights, Michigan 48127

Dear Mr. Asard:

Re: Notice of Migration of Contamination
2638 Princess Street
Inkster, Michigan 48141

I am writing to you to inform you that EaglePicher is currently working with the Michigan Department of Environmental Quality (MDEQ) to cleanup the groundwater at their facility located at 2638 Princess Street Inkster, Michigan. EaglePicher has detected certain volatile organic compounds (VOCs) in the shallow soil and perched groundwater beneath the facility. The perched groundwater exists at a depth range of about 3 to 9 feet below ground level. Based on samples that EaglePicher collected from groundwater monitoring well MW-9 (located less than 30 feet from the western property boundary), benzene and chlorobenzene are present at levels indicating these constituents may be present in the groundwater to the west of the facility at levels exceeding the MDEQ's criteria identified in MCL 324.20120a(1)(a). EaglePicher is providing you with the enclosed notice form regarding the migration of VOCs in groundwater in accordance with the requirements of applicable state laws.

Please note that EaglePicher has provided the enclosed notice to the MDEQ and will be working with the MDEQ to define and take any appropriate actions that are required to meet applicable standards for shallow groundwater containing VOCs.

2424 John Daly Road; Inkster, Michigan 48141
(313) 278-5956, (313) 278-3546 fax

42354Asard NOM letter

EaglePicher™ Automotive

In the meantime, if you have any questions regarding EaglePichers's environmental study, please contact me at (313) 724-2006.

Yours truly,

EaglePicher Automotive,

Doug Rommeck, Manager – Health, Safety and Environment

TMK/1/Det.
Encl.

2424 John Daly Road; Inkster, Michigan 48141
(313) 278-5956, (313) 278-3546 fax

42354Asard NOM letter

MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
REMEDIATION AND REDEVELOPMENT DIVISION

For DEQ Use Only
ITS # _____
Site ID #_____
Category Code: _____

NOTICE OF MIGRATION OF CONTAMINATION

(Under the authority of Part 201, Natural Resources and Environmental Protection Act, 1994 Act 451, as amended, (NREPA) and the Rules promulgated thereunder)

An owner or operator of property that is a facility, and/or who is subject to MCL 324.20114, and who has reason to believe that a hazardous substance is emanating from, has emanated from, or is likely to be emanating from the property and migrating beyond the boundaries of the property that he or she owns or operates is required under R 299.5522 and R 299.51017(1) to notify the Michigan Department of Environmental Quality ("DEQ") and affected property owners, unless he or she is exempt from MCL 324.20107a (see MCL 324.20107a(4) for exemptions), or unless he or she has provided the notice required by MCL 324.21309a. Submission of this notice does not fulfill the notification requirements of MCL324.21309a.

The notice must be provided within 45 days after the owner or operator has reason to believe that hazardous substances have migrated, or are likely to have migrated, to or beyond the boundary of his or her property (see R 299.51017 and R 299.5522 for exceptions). If a person is required to provide additional notice as a result of the changes in R 299.51017 that took effect on December 21, 2002, then that additional notice shall be provided not later than September 21, 2003.

Use of this form is mandatory for the notice required by R 299.51017(1) and may also be used by parties subject to MCL 324.20114 to provide notice required by R 299.5522. This form may also be used to provide notice to affected property owners as required by those rules.

If a person holds a permit for an oil and gas well under Part 615, Supervisor of Wells, of the NREPA and there is a release from the oil and gas exploration or production activities, that person shall give notice to the DEQ and to the owner of the surface rights of the property.

If a person holds an easement and there is a release from the easement holder's activities, that person shall provide notice to the DEQ and to the grantor of the easement, or the grantor's successor in interest, if any.

Completing this notice in no way relieves a person who is subject to MCL 324.20114 from the responsibility to undertake required response activities.

This notice must be sent to the DEQ office that serves the county in which the property is located. A list of DEQ offices is available at www.michigan.gov/bea, or by calling the Remediation and Redevelopment's Lansing office at 517-373-9837. The DEQ will not prepare acknowledgement of receipt of these notices. The sender is responsible for sending the report using a method that provides proof of delivery if such proof is desired. Please label the outside of the envelope "Migration Notice." Additional guidelines for the compliance with the requirements of R 200.51017(1) or R 299.5522 are available at www.michigan.gov/bea.

THIS NOTICE IS PROVIDED PURSUANT TO: **R 299.5522** ☒ **R 299.51017** ☒
(check both, if applicable)

Please provide the following information as completely as possible.

1. Name and location of the property that hazardous substances are emanating from:

   Name: EaglePicher Automotive
   Address: 2638 Princess Street
   Location:
   City/County: Inkster / Wayne
   Property Tax Identification Number, or if applicable, the ward and item number: 021 99 0010 001 & 021 99 0010 707

2. Status relative to the property:
   (Check one or both, as applicable.)

   Owner ☒
   Operator ☒

Provide any additional ID numbers associated with the property (e.g., EPA ID No., BEA No., Part 213 facility ID No., etc.):

3. Name, address, and telephone number of the property owner, operator, or other party submitting the notice:
   Name: EaglePicher Automotive
   Address: 2638 Princess Street
   City/State: Inkster / MIchigan
   Telephone number: (313) 724-2006

4. Name, address and telephone number of a contact person familiar with the content of the notice:
   Name: Tom Kinney of Conestoga-Rovers and Associates, Inc. (CRA)
   Address: 14496 N. Sheldon Road
   City/State: Plymouth / MI
   Telephone: (734) 453-5123

5. If this Notice is provided pursuant to R 299.51017, provide the address and other location information for the *adjacent* property(s) onto which contamination is migrating, has migrated, or is likely to migrate. If this Notice is provided pursuant to R 299.5522, provide the address and other location information for *each* property onto which contamination has migrated. Notice should be sent to the property owner of record. If the impacted property is owned by the State of Michigan, notice should be sent to the department managing the property (i.e. a prison, state park, etc.). Notices to the Michigan Department of Transportation (MDOT) for state owned roadways should be sent to Ms. Heather Hicks, MDOT-Bureau of Transportation Planning, 425 W. Ottawa Street, P.O. Box 30050, Lansing, MI 48989. If it isn't readily apparent what state department manages the property, notices should be sent to Mr. Thomas Saxton, Tenant and Land Services, Department of Management and Budget, 1st Floor Lewis-Cass Building, P.O. Box 30026, Lansing, MI 48909.

Address: 2640 Princess St.
City/State: Inkster / MI 48141
Property Tax ID number: 021 99 0010 706
Other: Richwall Custom Cabinetry

Notified? No ☐ Yes ☒ Date: April 7, 2006

Address: 8505 Terra Bella Dr.
City/State: Northville / MI 48167
Property Tax ID number: 021 99 0010 004
Other: Prep LLC

Notified? No ☐ Yes ☒ Date: April 7, 2006

Address: 535 Berwyn
City/State: Dearborn Heights / MI 48127
Property Tax ID number: 021 99 0010 005
Other: Asard, John

Notified? No ☐ Yes ☒ Date: April 7, 2006

Address: Ms. Pauline Mapp
Law Department, Box 241
Norfolk Southern Corporation
Three Commercial Place
City/State: Norfolk, Virginia 23510
Property Tax ID number: 021 99 0008 000

Notified? No ☐ Yes ☒ Date: April 7, 2006

Address:
City/State:
Property Tax ID number:
Other:

Notified? No ☐ Yes ☐ Date:

(Attach additional pages as needed)

6. Complete the Table on Page 3 of this Form for each hazardous substance which has migrated, or is likely to have migrated, beyond the property boundary at a concentration that exceeds a Generic Residential Cleanup Criterion developed by the DEQ pursuant to MCL 324.20120a(1). Complete and attach additional copies of Page 3, if necessary, to list all hazardous substances that must be reported. Include a scaled map or drawing that shows the location of sampling points identified on the Table on Page 3, the property boundaries, and the adjacent property owners if providing notice pursuant to R 299.1017(1) or all impacted property owners if providing notice pursuant to Rule 299.5522.

7. Provide a summary of the information which shows that contamination is emanating from, or has emanated from, and is present beyond the boundary of the source property at a concentration which exceeds that allowed by MCL 324.20120a(1)(a). This summary shall identify the environmental media affected, specific hazardous substances, and the concentrations of those hazardous substances in all affected environmental media at the property boundary and in any sample locations beyond the property boundary. The summary shall also describe the basis for the conclusion that the contamination is emanating, has emanated, or is present beyond the boundary of the source property, including whether the conclusion is based on groundwater analytical data or fate and transport modeling, both, or neither.

   Based on analytical data from groundwater samples that EaglePicher collected at their Wolverine Gasket, Inkster facility, shallow perched groundwater containing benzene (10 ug/l) and chlorbenzene (510 ug/l) has migrated off-site to the south (MWO-02). Additionally, a well (MW-9) less than 30 feet from the western property boundary has benzene (31,000 ug/l) and chlorbenzene (4,900 ug/l) indicating these constituents may be present in the groundwater to the west of the facility at levels exceeding MCL 324.20120a(1)(a). Additionally, a well (MW-8) less than 15 feet from the north-northwest property boundary has benzene (46 ug/l) and chlorbenzene (910 ug/l) indicating these constituents may have migrated off-site to the north-northwest at levels exceeding MCL 324.20120a(1)(a).

8. If the person making this notice has reason to believe that a migrating hazardous substance has affected, or is likely to affect, a private or public water supply, then that water supply must be identified here: ***Not applicable***

	YES	NO
9. Is this notice being submitted within the timeframes established under R 299.5522 and/or R 299.51017, as applicable?	☒	☐
10. Is this notice in addition to a notice submitted prior to *December 21, 2002?* (R 299.51017(4)(c))	☐	☒
11. Is this notice related to an oil and gas well permit (R 299.51017(2))? Permit #:	☐	☒
12. Is this notice related to an easement (R 299.51017(3))? (NOTE: All easement grantors *must* receive this notice.)	☐	☒
13. Has surface water been affected (R 299.51017(1) and R 299.5522(2))? (If yes, please identify the affected surface water body.)	☐	☒

CERTIFICATION:

With my signature below, I certify that I am the owner of the facility or that I am legally authorized to execute this notice on behalf of the owner or operator named on this form, and that to the best of my knowledge and belief the above representations are complete and accurate. I understand that intentionally submitting false information to the DEQ is a felony and may result in fines up to $25,000 for each violation.

Signature _____ Date _____
(Owner or person legally authorized to bind the person making this report)

Name (Typed or Printed) _____

Title (Typed or Printed) _____

See Item 6 on Page 2 of this Form for instructions to be used in completing this Table. Attach additional pages if necessary. The information to be included in each column of the Table is:

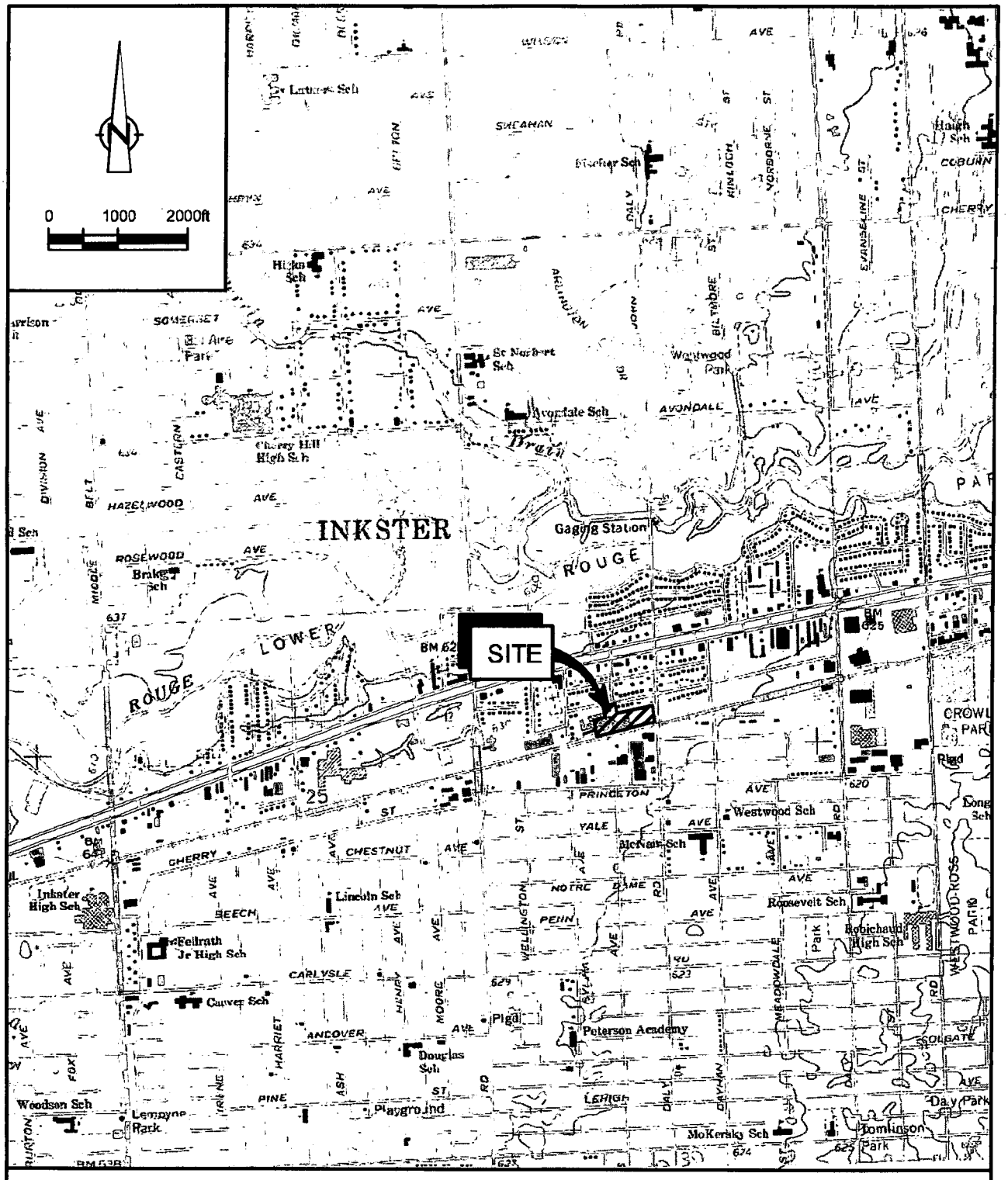
Column A Name of hazardous substance.
Column B Chemical Abstract Service (CAS) Number for the hazardous substance.
Column C Maximum hazardous substance concentration measured on the property, expressed in parts per billion (e.g., ug/L or ug/Kg). Report maximum concentration separately for each environmental medium.
Column D Sample location for Column C (relate to label on map).
Column E Environmental medium in which concentration reported in Column C was measured (e.g., soil or groundwater).
Column F Distance from point of maximum measured concentration (Column D) to property boundary, in direction of contaminant migration, if direction is known or can reasonably be inferred. If direction is unknown, list distance to nearest property boundary.
Column G Direction of contaminant migration, if known.
Column H Concentration closest to property boundary, if known. If a concentration lower than the maximum concentration reported in Column C has been measured at a point closer to the property boundary in the direction of contaminant migration, use Column I to list the concentration that was measured closest to the property boundary in the direction of contaminant migration.
Column I Sample location for Column H (relate to label on map).
Column J Environmental medium for measurement reported in Column H, if applicable.

A Hazardous Substance	B CAS Number	C Maximum Concentration ug/l	D Sample Location for "C"	E Environmental Medium for "C"	F Distance to Property Boundary	C Maximum Concentration ug/l	H Boundary Concentration ug/l	I Sample Location for "H"	J Environmental Medium for "H"
Benzene	71432	41,000	MW102-05	Groundwater	110 feet	Variable Depending on Season	31,000	MW-9	Groundwater
Chlorobenzene	108907	110,000	MW102-05	Groundwater	110 feet	Variable Depending on Season	4,900	MW-9	Groundwater
Ethylbenzene	100414	4,700	MW102-05	Groundwater	110 feet	Variable Depending on Season	Non-detect	MW-9	Groundwater
Toluene	108883	9,700	MW-7	Groundwater	130 feet	Variable Depending on Season	Non-detect	MW-9	Groundwater
Xylenes	1330207	19,000	MW102-05	Groundwater	110 feet	Variable Depending on Season	Non-detect	MW-9	Groundwater
MEK	78933	17,000	MW102-05	Groundwater	110 feet	Variable Depending on Season	Non-detect	MW-9	Groundwater

Total Number Samples Collected: 44 collected since 6/04 Total Number of Samples Exceeding Criteria: 31

A scaled map or drawing showing these locations and the property boundaries must be submitted with this Notice

MI0013131



SOURCE: USGS QUADRANGLE MAP;
INKSTER, MICHIGAN

figure 1

SITE LOCATION
EAGLEPICHER - WOLVERINE GASKET
Inkster, Michigan

42354-07(MDEQ001)GN-DE001 MAR 31/2006

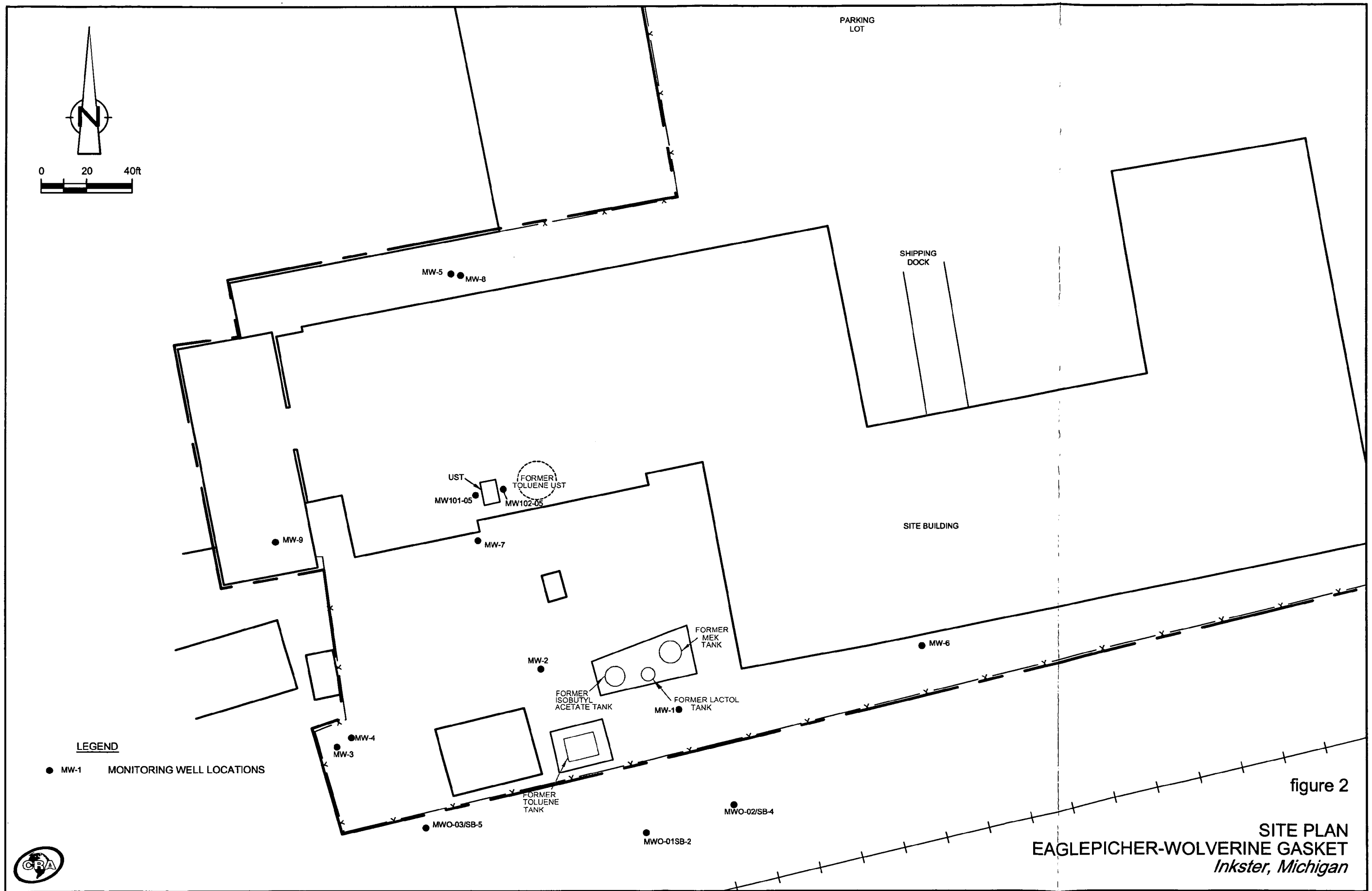


figure 2

SITE PLAN
EAGLEPICHER-WOLVERINE GASKET
Inkster, Michigan

42354-04(MDEQ001)GN-DE001 APR 07/2006

MI0013133

EaglePicher™ Automotive

April 7, 2006 Reference No. 42354

Richwall Custom Cabinetry
2640 Princess Street
Inkster, Michigan 48141

To whom it may concern:

Re: Notice of Migration of Contamination
2638 Princess Street
Inkster, Michigan 48141

I am writing to you to inform you that EaglePicher is currently working with the Michigan Department of Environmental Quality (MDEQ) to cleanup the groundwater at their facility located at 2638 Princess Street Inkster, Michigan. EaglePicher has detected certain volatile organic compounds (VOCs) in the shallow soil and perched groundwater beneath the facility. The perched groundwater exists at a depth range of about 3 to 9 feet below ground level. Based on samples that EaglePicher collected from groundwater monitoring well MW-9 (located less than 30 feet from the western property boundary), benzene and chlorobenzene are present at levels indicating these constituents may be present in the groundwater to the west of the facility at levels exceeding the MDEQ's criteria identified in MCL 324.20120a(1)(a). EaglePicher is providing you with the enclosed notice form regarding the migration of VOCs in groundwater in accordance with the requirements of applicable state laws.

Please note that EaglePicher has provided the enclosed notice to the MDEQ and will be working with the MDEQ to define and take any appropriate actions that are required to meet applicable standards for shallow groundwater containing VOCs.

2424 John Daly Road; Inkster, Michigan 48141
(313) 278-5956, (313) 278-3546 fax

EP Ltr

EaglePicher™

In the meantime, if you have any questions regarding EaglePichers's environmental study, please contact me at (313) 724-2006.

Yours truly,

EaglePicher Automotive,

Doug Rommeck, Manager – Health, Safety and Environment

TMK/1/Det.
Encl.

2424 John Daly Road; Inkster, Michigan 48141
(313) 278-5956, (313) 278-3546 fax

EP Ltr

MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
REMEDIATION AND REDEVELOPMENT DIVISION

For DEQ Use Only
ITS # _____
Site ID #_____
Category Code: _____

NOTICE OF MIGRATION OF CONTAMINATION

(Under the authority of Part 201, Natural Resources and Environmental Protection Act, 1994 Act 451, as amended, (NREPA) and the Rules promulgated thereunder)

An owner or operator of property that is a facility, and/or who is subject to MCL 324.20114, and who has reason to believe that a hazardous substance is emanating from, has emanated from, or is likely to be emanating from the property and migrating beyond the boundaries of the property that he or she owns or operates is required under R 299.5522 and R 299.51017(1) to notify the Michigan Department of Environmental Quality ("DEQ") and affected property owners, unless he or she is exempt from MCL 324.20107a (see MCL 324.20107a(4) for exemptions), or unless he or she has provided the notice required by MCL 324.21309a. Submission of this notice does not fulfill the notification requirements of MCL324.21309a.

The notice must be provided within 45 days after the owner or operator has reason to believe that hazardous substances have migrated, or are likely to have migrated, to or beyond the boundary of his or her property (see R 299.51017 and R 299.5522 for exceptions). If a person is required to provide additional notice as a result of the changes in R 299.51017 that took effect on December 21, 2002, then that additional notice shall be provided not later than September 21, 2003.

Use of this form is mandatory for the notice required by R 299.51017(1) and may also be used by parties subject to MCL 324.20114 to provide notice required by R 299.5522. This form may also be used to provide notice to affected property owners as required by those rules.

If a person holds a permit for an oil and gas well under Part 615, Supervisor of Wells, of the NREPA and there is a release from the oil and gas exploration or production activities, that person shall give notice to the DEQ and to the owner of the surface rights of the property.

If a person holds an easement and there is a release from the easement holder's activities, that person shall provide notice to the DEQ and to the grantor of the easement, or the grantor's successor in interest, if any.

Completing this notice in no way relieves a person who is subject to MCL 324.20114 from the responsibility to undertake required response activities.

This notice must be sent to the DEQ office that serves the county in which the property is located. A list of DEQ offices is available at www.michigan.gov/bea, or by calling the Remediation and Redevelopment's Lansing office at 517-373-9837. The DEQ will not prepare acknowledgement of receipt of these notices. The sender is responsible for sending the report using a method that provides proof of delivery if such proof is desired. Please label the outside of the envelope "Migration Notice." Additional guidelines for the compliance with the requirements of R 200.51017(1) or R 299.5522 are available at www.michigan.gov/bea.

THIS NOTICE IS PROVIDED PURSUANT TO: **R 299.5522** ☒ **R 299.51017** ☒
(check both, if applicable)

Please provide the following information as completely as possible.

1. Name and location of the property that hazardous substances are emanating from:

   Name: EaglePicher Automotive
   Address: 2638 Princess Street
   Location:
   City/County: Inkster / Wayne
   Property Tax Identification Number, or if applicable, the ward and item number: 021 99 0010 001 & 021 99 0010 707

2. Status relative to the property:
   (Check one or both, as applicable.)

   Owner ☒
   Operator ☒

Provide any additional ID numbers associated with the property (e.g., EPA ID No., BEA No., Part 213 facility ID No., etc.):

3. Name, address, and telephone number of the property owner, operator, or other party submitting the notice:
   Name: EaglePicher Automotive
   Address: 2638 Princess Street
   City/State: Inkster / MIchigan
   Telephone number: (313) 724-2006

4. Name, address and telephone number of a contact person familiar with the content of the notice:
   Name: Tom Kinney of Conestoga-Rovers and Associates, Inc. (CRA)
   Address: 14496 N. Sheldon Road
   City/State: Plymouth / MI
   Telephone: (734) 453-5123

5. If this Notice is provided pursuant to R 299.51017, provide the address and other location information for the *adjacent* property(s) onto which contamination is migrating, has migrated, or is likely to migrate. If this Notice is provided pursuant to R 299.5522, provide the address and other location information for *each* property onto which contamination has migrated. Notice should be sent to the property owner of record. If the impacted property is owned by the State of Michigan, notice should be sent to the department managing the property (i.e. a prison, state park, etc.). Notices to the Michigan Department of Transportation (MDOT) for state owned roadways should be sent to Ms. Heather Hicks, MDOT-Bureau of Transportation Planning, 425 W. Ottawa Street, P.O. Box 30050, Lansing, MI 48989. If it isn't readily apparent what state department manages the property, notices should be sent to Mr. Thomas Saxton, Tenant and Land Services, Department of Management and Budget, 1st Floor Lewis-Cass Building, P.O. Box 30026, Lansing, MI 48909.

Address: 2640 Princess St.
City/State: Inkster / MI 48141
Property Tax ID number: 021 99 0010 706
Other: Richwall Custom Cabinetry

Notified? No ☐ Yes ☒ Date: April 7, 2006

Address: 8505 Terra Bella Dr.
City/State: Northville / MI 48167
Property Tax ID number: 021 99 0010 004
Other: Prep LLC

Notified? No ☐ Yes ☒ Date: April 7, 2006

Address: 535 Berwyn
City/State: Dearborn Heights / MI 48127
Property Tax ID number: 021 99 0010 005
Other: Asard, John

Notified? No ☐ Yes ☒ Date: April 7, 2006

Address: Ms. Pauline Mapp
Law Department, Box 241
Norfolk Southern Corporation
Three Commercial Place
City/State: Norfolk, Virginia 23510
Property Tax ID number: 021 99 0008 000

Notified? No ☐ Yes ☒ Date: April 7, 2006

Address:
City/State:
Property Tax ID number:
Other:

Notified? No ☐ Yes ☐ Date:

(Attach additional pages as needed)

6. Complete the Table on Page 3 of this Form for each hazardous substance which has migrated, or is likely to have migrated, beyond the property boundary at a concentration that exceeds a Generic Residential Cleanup Criterion developed by the DEQ pursuant to MCL 324.20120a(1). Complete and attach additional copies of Page 3, if necessary, to list all hazardous substances that must be reported. Include a scaled map or drawing that shows the location of sampling points identified on the Table on Page 3, the property boundaries, and the adjacent property owners if providing notice pursuant to R 299.1017(1) or all impacted property owners if providing notice pursuant to Rule 299.5522.

7. Provide a summary of the information which shows that contamination is emanating from, or has emanated from, and is present beyond the boundary of the source property at a concentration which exceeds that allowed by MCL 324.20120a(1)(a). This summary shall identify the environmental media affected, specific hazardous substances, and the concentrations of those hazardous substances in all affected environmental media at the property boundary and in any sample locations beyond the property boundary. The summary shall also describe the basis for the conclusion that the contamination is emanating, has emanated, or is present beyond the boundary of the source property, including whether the conclusion is based on groundwater analytical data or fate and transport modeling, both, or neither.

   Based on analytical data from groundwater samples that EaglePicher collected at their Wolverine Gasket, Inkster facility, shallow perched groundwater containing benzene (10 ug/l) and chlorbenzene (510 ug/l) has migrated off-site to the south (MWO-02). Additionally, a well (MW-9) less than 30 feet from the western property boundary has benzene (31,000 ug/l) and chlorbenzene (4,900 ug/l) indicating these constituents may be present in the groundwater to the west of the facility at levels exceeding MCL 324.20120a(1)(a). Additionally, a well (MW-8) less than 15 feet from the north-northwest property boundary has benzene (46 ug/l) and chlorbenzene (910 ug/l) indicating these constituents may have migrated off-site to the north-northwest at levels exceeding MCL 324.20120a(1)(a).

8. If the person making this notice has reason to believe that a migrating hazardous substance has affected, or is likely to affect, a private or public water supply, then that water supply must be identified here: ***Not applicable***

	YES	NO
9. Is this notice being submitted within the timeframes established under R 299.5522 and/or R 299.51017, as applicable?	☒	☐
10. Is this notice in addition to a notice submitted prior to *December 21, 2002?* (R 299.51017(4)(c))	☐	☒
11. Is this notice related to an oil and gas well permit (R 299.51017(2))? Permit #:	☐	☒
12. Is this notice related to an easement (R 299.51017(3))? (NOTE: All easement grantors *must* receive this notice.)	☐	☒
13. Has surface water been affected (R 299.51017(1) and R 299.5522(2))? (If yes, please identify the affected surface water body.)	☐	☒

CERTIFICATION:

With my signature below, I certify that I am the owner of the facility or that I am legally authorized to execute this notice on behalf of the owner or operator named on this form, and that to the best of my knowledge and belief the above representations are complete and accurate. I understand that intentionally submitting false information to the DEQ is a felony and may result in fines up to $25,000 for each violation.

Signature _____ Date _____
(Owner or person legally authorized to bind the person making this report)

Name (Typed or Printed) _____

Title (Typed or Printed) _____

See Item 6 on Page 2 of this Form for instructions to be used in completing this Table. Attach additional pages if necessary. The information to be included in each column of the Table is:

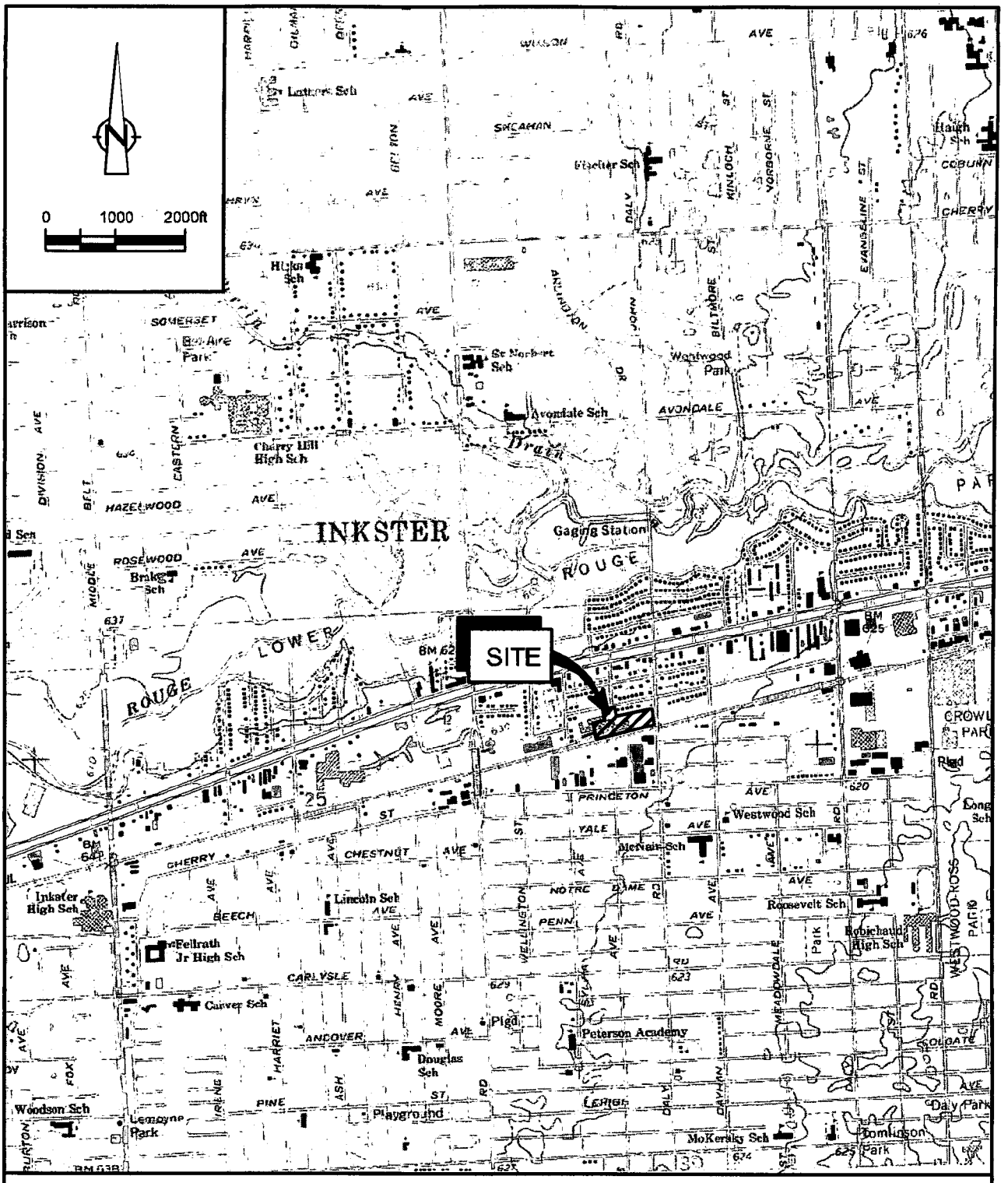
Column A Name of hazardous substance.
Column B Chemical Abstract Service (CAS) Number for the hazardous substance.
Column C Maximum hazardous substance concentration measured on the property, expressed in parts per billion (e.g., ug/L or ug/Kg). Report maximum concentration separately for each environmental medium.
Column D Sample location for Column C (relate to label on map).
Column E Environmental medium in which concentration reported in Column C was measured (e.g., soil or groundwater).
Column F Distance from point of maximum measured concentration (Column D) to property boundary, in direction of contaminant migration, if direction is known or can reasonably be inferred. If direction is unknown, list distance to nearest property boundary.
Column G Direction of contaminant migration, if known.
Column H Concentration closest to property boundary, if known. If a concentration lower than the maximum concentration reported in Column C has been measured at a point closer to the property boundary in the direction of contaminant migration, use Column I to list the concentration that was measured closest to the property boundary in the direction of contaminant migration.
Column I Sample location for Column H (relate to label on map).
Column J Environmental medium for measurement reported in Column H, if applicable.

A Hazardous Substance	B CAS Number	C Maximum Concentration ug/l	D Sample Location for "C"	E Environmental Medium for "C"	F Distance to Property Boundary	C Maximum Concentration ug/l	H Boundary Concentration ug/l	I Sample Location for "H"	J Environmental Medium for "H"
Benzene	71432	41,000	MW102-05	Groundwater	110 feet	Variable Depending on Season	31,000	MW-9	Groundwater
Chlorobenzene	108907	110,000	MW102-05	Groundwater	110 feet	Variable Depending on Season	4,900	MW-9	Groundwater
Ethylbenzene	100414	4,700	MW102-05	Groundwater	110 feet	Variable Depending on Season	Non-detect	MW-9	Groundwater
Toluene	108883	9,700	MW-7	Groundwater	130 feet	Variable Depending on Season	Non-detect	MW-9	Groundwater
Xylenes	1330207	19,000	MW102-05	Groundwater	110 feet	Variable Depending on Season	Non-detect	MW-9	Groundwater
MEK	78933	17,000	MW102-05	Groundwater	110 feet	Variable Depending on Season	Non-detect	MW-9	Groundwater

Total Number Samples Collected: 44 collected since 6/04 Total Number of Samples Exceeding Criteria: 31

A scaled map or drawing showing these locations and the property boundaries must be submitted with this Notice

MI0013139



SOURCE: USGS QUADRANGLE MAP;
INKSTER, MICHIGAN

figure 1

SITE LOCATION
EAGLEPICHER - WOLVERINE GASKET
Inkster, Michigan

42354-07(MDEQ001)GN-DE001 MAR 31/2006

MI0013140

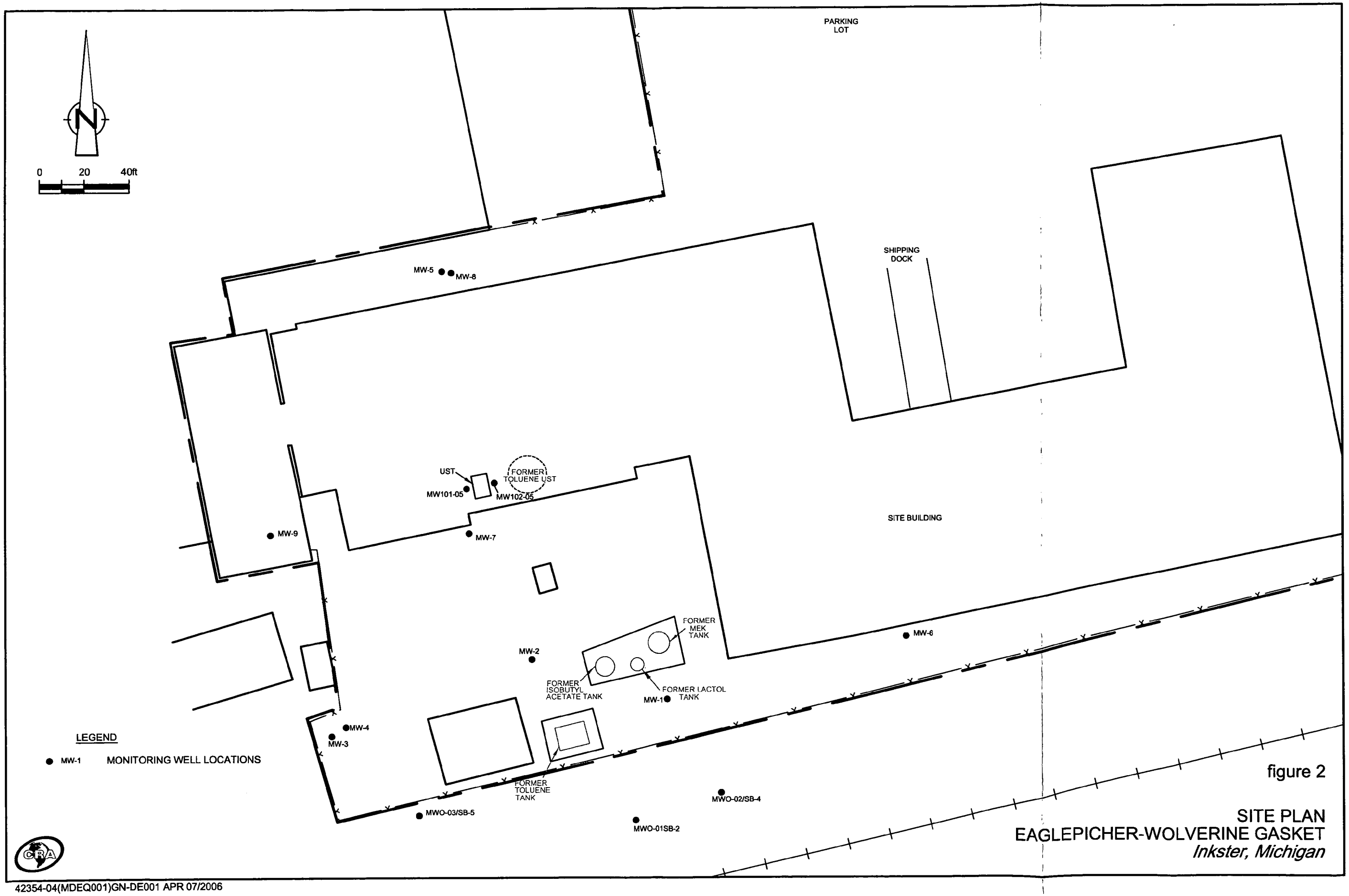


figure 2

SITE PLAN
EAGLEPICHER-WOLVERINE GASKET
Inkster, Michigan

42354-04(MDEQ001)GN-DE001 APR 07/2006

MI0013141

EaglePicher™ Automotive

April 7, 2006

Reference No. 42354

Prep LLC
8505 Terra Bella Drive
Northville, Michigan 48167

To whom it may concern:

Re: Notice of Migration of Contamination
2638 Princess Street
Inkster, Michigan 48141

I am writing to you to inform you that EaglePicher is currently working with the Michigan Department of Environmental Quality (MDEQ) to cleanup the groundwater at their facility located at 2638 Princess Street Inkster, Michigan. EaglePicher has detected certain volatile organic compounds (VOCs) in the shallow soil and perched groundwater beneath the facility. The perched groundwater exists at a depth range of about 3 to 9 feet below ground level. Based on samples that EaglePicher collected from groundwater monitoring well MW-8 (located approximately 15 feet from the north-northwest property boundary), benzene and chlorobenzene are present at levels indicating these constituents may be migrating onto your property at levels exceeding the MDEQ's criteria identified in MCL 324.20120a(1)(a). EaglePicher is providing you with the enclosed notice form regarding the migration of VOCs in groundwater in accordance with the requirements of applicable state laws.

Please note that EaglePicher has provided the enclosed notice to the MDEQ and will be working with the MDEQ to define and take any appropriate actions that are required to meet applicable standards for shallow groundwater containing VOCs.

2424 John Daly Road; Inkster, Michigan 48141
(313) 278-5956, (313) 278-3546 fax

EaglePicher™ Automotive

In the meantime, if you have any questions regarding EaglePichers's environmental study, please contact me at (313) 724-2006.

Yours truly,

EaglePicher Automotive,

Doug Rommeck, Manager – Health, Safety and Environment

TMK/1/Det.
Encl.

2424 John Daly Road; Inkster, Michigan 48141
(313) 278-5956, (313) 278-3546 fax

42354PrepLLC NOM letter

MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
REMEDIATION AND REDEVELOPMENT DIVISION

For DEQ Use Only
ITS # _____
Site ID #_____
Category Code: _____

NOTICE OF MIGRATION OF CONTAMINATION

(Under the authority of Part 201, Natural Resources and Environmental Protection Act, 1994 Act 451, as amended, (NREPA) and the Rules promulgated thereunder)

An owner or operator of property that is a facility, and/or who is subject to MCL 324.20114, and who has reason to believe that a hazardous substance is emanating from, has emanated from, or is likely to be emanating from the property and migrating beyond the boundaries of the property that he or she owns or operates is required under R 299.5522 and R 299.51017(1) to notify the Michigan Department of Environmental Quality ("DEQ") and affected property owners, unless he or she is exempt from MCL 324.20107a (see MCL 324.20107a(4) for exemptions), or unless he or she has provided the notice required by MCL 324.21309a. Submission of this notice does not fulfill the notification requirements of MCL324.21309a.

The notice must be provided within 45 days after the owner or operator has reason to believe that hazardous substances have migrated, or are likely to have migrated, to or beyond the boundary of his or her property (see R 299.51017 and R 299.5522 for exceptions). If a person is required to provide additional notice as a result of the changes in R 299.51017 that took effect on December 21, 2002, then that additional notice shall be provided not later than September 21, 2003.

Use of this form is mandatory for the notice required by R 299.51017(1) and may also be used by parties subject to MCL 324.20114 to provide notice required by R 299.5522. This form may also be used to provide notice to affected property owners as required by those rules.

If a person holds a permit for an oil and gas well under Part 615, Supervisor of Wells, of the NREPA and there is a release from the oil and gas exploration or production activities, that person shall give notice to the DEQ and to the owner of the surface rights of the property.

If a person holds an easement and there is a release from the easement holder's activities, that person shall provide notice to the DEQ and to the grantor of the easement, or the grantor's successor in interest, if any.

Completing this notice in no way relieves a person who is subject to MCL 324.20114 from the responsibility to undertake required response activities.

This notice must be sent to the DEQ office that serves the county in which the property is located. A list of DEQ offices is available at www.michigan.gov/bea, or by calling the Remediation and Redevelopment's Lansing office at 517-373-9837. The DEQ will not prepare acknowledgement of receipt of these notices. The sender is responsible for sending the report using a method that provides proof of delivery if such proof is desired. Please label the outside of the envelope "Migration Notice." Additional guidelines for the compliance with the requirements of R 200.51017(1) or R 299.5522 are available at www.michigan.gov/bea.

THIS NOTICE IS PROVIDED PURSUANT TO: **R 299.5522** ☒ **R 299.51017** ☒
(check both, if applicable)

Please provide the following information as completely as possible.

1. Name and location of the property that hazardous substances are emanating from:

   Name: EaglePicher Automotive
   Address: 2638 Princess Street
   Location:
   City/County: Inkster / Wayne
   Property Tax Identification Number, or if applicable, the ward and item number: 021 99 0010 001 & 021 99 0010 707

2. Status relative to the property:
   (Check one or both, as applicable.)

   Owner ☒
   Operator ☒

Provide any additional ID numbers associated with the property (e.g., EPA ID No., BEA No., Part 213 facility ID No., etc.):

3. Name, address, and telephone number of the property owner, operator, or other party submitting the notice:
   Name: EaglePicher Automotive
   Address: 2638 Princess Street
   City/State: Inkster / MIchigan
   Telephone number: (313) 724-2006

4. Name, address and telephone number of a contact person familiar with the content of the notice:
   Name: Tom Kinney of Conestoga-Rovers and Associates, Inc. (CRA)
   Address: 14496 N. Sheldon Road
   City/State: Plymouth / MI
   Telephone: (734) 453-5123

5. If this Notice is provided pursuant to R 299.51017, provide the address and other location information for the *adjacent* property(s) onto which contamination is migrating, has migrated, or is likely to migrate. If this Notice is provided pursuant to R 299.5522, provide the address and other location information for *each* property onto which contamination has migrated. Notice should be sent to the property owner of record. If the impacted property is owned by the State of Michigan, notice should be sent to the department managing the property (i.e. a prison, state park, etc.). Notices to the Michigan Department of Transportation (MDOT) for state owned roadways should be sent to Ms. Heather Hicks, MDOT-Bureau of Transportation Planning, 425 W. Ottawa Street, P.O. Box 30050, Lansing, MI 48989. If it isn't readily apparent what state department manages the property, notices should be sent to Mr. Thomas Saxton, Tenant and Land Services, Department of Management and Budget, 1st Floor Lewis-Cass Building, P.O. Box 30026, Lansing, MI 48909.

Address: 2640 Princess St.
City/State: Inkster / MI 48141
Property Tax ID number: 021 99 0010 706
Other: Richwall Custom Cabinetry

Notified? No ☐ Yes ☒ Date: April 7, 2006

Address: 8505 Terra Bella Dr.
City/State: Northville / MI 48167
Property Tax ID number: 021 99 0010 004
Other: Prep LLC

Notified? No ☐ Yes ☒ Date: April 7, 2006

Address: 535 Berwyn
City/State: Dearborn Heights / MI 48127
Property Tax ID number: 021 99 0010 005
Other: Asard, John

Notified? No ☐ Yes ☒ Date: April 7, 2006

Address: Ms. Pauline Mapp
Law Department, Box 241
Norfolk Southern Corporation
Three Commercial Place
City/State: Norfolk, Virginia 23510
Property Tax ID number: 021 99 0008 000

Notified? No ☐ Yes ☒ Date: April 7, 2006

Address:
City/State:
Property Tax ID number:
Other:

Notified? No ☐ Yes ☐ Date:

(Attach additional pages as needed)

6. Complete the Table on Page 3 of this Form for each hazardous substance which has migrated, or is likely to have migrated, beyond the property boundary at a concentration that exceeds a Generic Residential Cleanup Criterion developed by the DEQ pursuant to MCL 324.20120a(1). Complete and attach additional copies of Page 3, if necessary, to list all hazardous substances that must be reported. Include a scaled map or drawing that shows the location of sampling points identified on the Table on Page 3, the property boundaries, and the adjacent property owners if providing notice pursuant to R 299.1017(1) or all impacted property owners if providing notice pursuant to Rule 299.5522.

7. Provide a summary of the information which shows that contamination is emanating from, or has emanated from, and is present beyond the boundary of the source property at a concentration which exceeds that allowed by MCL 324.20120a(1)(a). This summary shall identify the environmental media affected, specific hazardous substances, and the concentrations of those hazardous substances in all affected environmental media at the property boundary and in any sample locations beyond the property boundary. The summary shall also describe the basis for the conclusion that the contamination is emanating, has emanated, or is present beyond the boundary of the source property, including whether the conclusion is based on groundwater analytical data or fate and transport modeling, both, or neither.

   Based on analytical data from groundwater samples that EaglePicher collected at their Wolverine Gasket, Inkster facility, shallow perched groundwater containing benzene (10 ug/l) and chlorbenzene (510 ug/l) has migrated off-site to the south (MWO-02). Additionally, a well (MW-9) less than 30 feet from the western property boundary has benzene (31,000 ug/l) and chlorbenzene (4,900 ug/l) indicating these constituents may be present in the groundwater to the west of the facility at levels exceeding MCL 324.20120a(1)(a). Additionally, a well (MW-8) less than 15 feet from the north-northwest property boundary has benzene (46 ug/l) and chlorbenzene (910 ug/l) indicating these constituents may have migrated off-site to the north-northwest at levels exceeding MCL 324.20120a(1)(a).

8. If the person making this notice has reason to believe that a migrating hazardous substance has affected, or is likely to affect, a private or public water supply, then that water supply must be identified here: ***Not applicable***

	YES	NO
9. Is this notice being submitted within the timeframes established under R 299.5522 and/or R 299.51017, as applicable?	☒	☐
10. Is this notice in addition to a notice submitted prior to *December 21, 2002?* (R 299.51017(4)(c))	☐	☒
11. Is this notice related to an oil and gas well permit (R 299.51017(2))? Permit #:	☐	☒
12. Is this notice related to an easement (R 299.51017(3))? (NOTE: All easement grantors *must* receive this notice.)	☐	☒
13. Has surface water been affected (R 299.51017(1) and R 299.5522(2))? (If yes, please identify the affected surface water body.)	☐	☒

CERTIFICATION:

With my signature below, I certify that I am the owner of the facility or that I am legally authorized to execute this notice on behalf of the owner or operator named on this form, and that to the best of my knowledge and belief the above representations are complete and accurate. I understand that intentionally submitting false information to the DEQ is a felony and may result in fines up to $25,000 for each violation.

Signature _____ Date _____
(Owner or person legally authorized to bind the person making this report)

Name (Typed or Printed) _____

Title (Typed or Printed) _____

See Item 6 on Page 2 of this Form for instructions to be used in completing this Table. Attach additional pages if necessary. The information to be included in each column of the Table is:

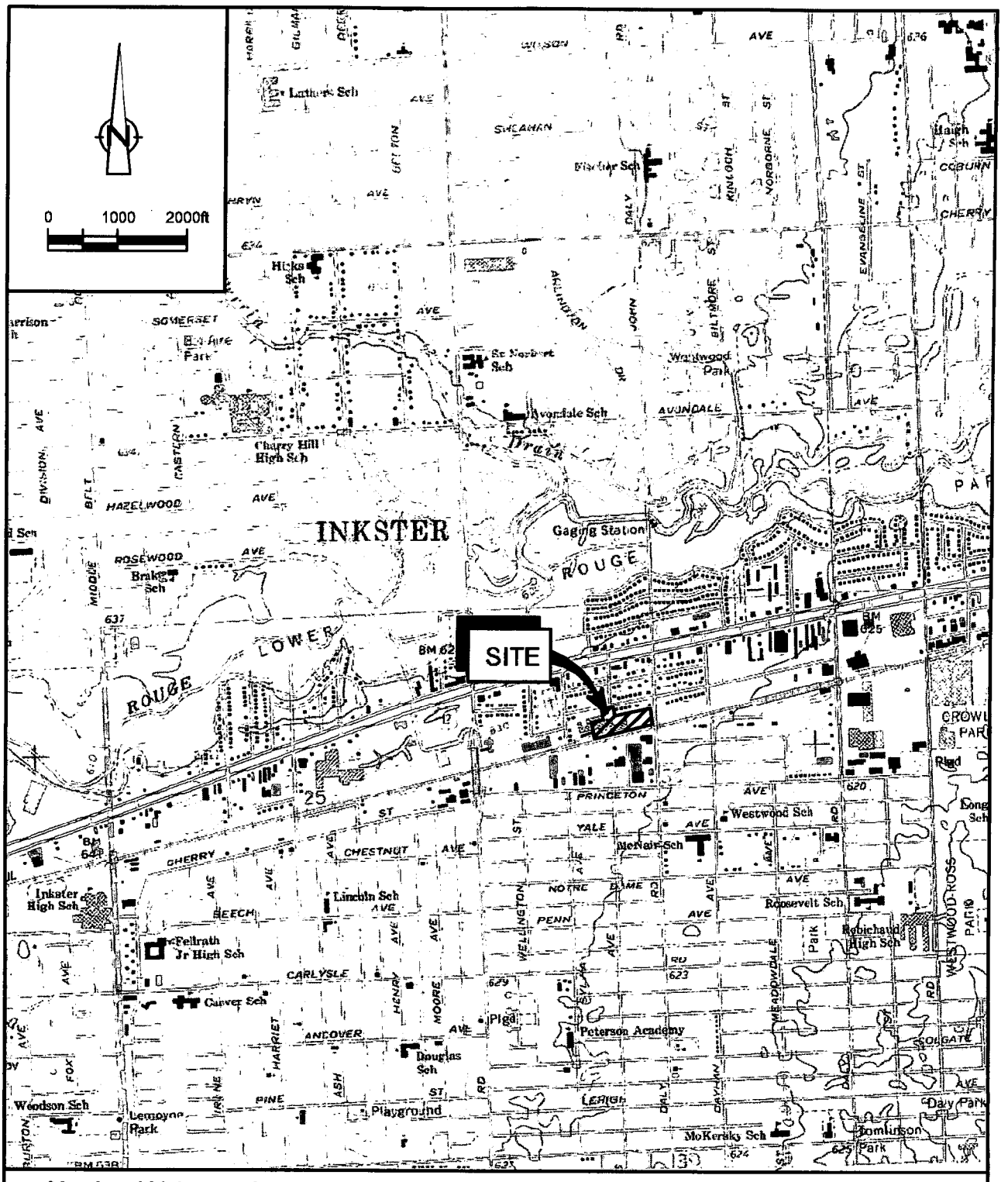
Column A Name of hazardous substance.
Column B Chemical Abstract Service (CAS) Number for the hazardous substance.
Column C Maximum hazardous substance concentration measured on the property, expressed in parts per billion (e.g., ug/L or ug/Kg). Report maximum concentration separately for each environmental medium.
Column D Sample location for Column C (relate to label on map).
Column E Environmental medium in which concentration reported in Column C was measured (e.g., soil or groundwater).
Column F Distance from point of maximum measured concentration (Column D) to property boundary, in direction of contaminant migration, if direction is known or can reasonably be inferred. If direction is unknown, list distance to nearest property boundary.
Column G Direction of contaminant migration, if known.
Column H Concentration closest to property boundary, if known. If a concentration lower than the maximum concentration reported in Column C has been measured at a point closer to the property boundary in the direction of contaminant migration, use Column I to list the concentration that was measured closest to the property boundary in the direction of contaminant migration.
Column I Sample location for Column H (relate to label on map).
Column J Environmental medium for measurement reported in Column H, if applicable.

A Hazardous Substance	B CAS Number	C Maximum Concentration ug/l	D Sample Location for "C"	E Environmental Medium for "C"	F Distance to Property Boundary	G Direction of Migration	H Boundary Concentration ug/l	I Sample Location for "H"	J Environmental Medium for "H"
Benzene	71432	41,000	MW102-05	Groundwater	110 feet	Variable Depending on Season	46	MW-8	Groundwater
Chlorobenzene	108907	110,000	MW102-05	Groundwater	110 feet	Variable Depending on Season	910	MW-8	Groundwater
Ethylbenzene	100414	4,700	MW102-05	Groundwater	110 feet	Variable Depending on Season	29	MW-8	Groundwater
Toluene	108883	9,700	MW-7	Groundwater	130 feet	Variable Depending on Season	58	MW-8	Groundwater
Xylenes	1330207	19,000	MW102-05	Groundwater	110 feet	Variable Depending on Season	110	MW-8	Groundwater
MEK	78933	17,000	MW102-05	Groundwater	110 feet	Variable Depending on Season	15	MW-8	Groundwater

Total Number Samples Collected: 44 collected since 6/04 Total Number of Samples Exceeding Criteria: 31

A scaled map or drawing showing these locations and the property boundaries must be submitted with this Notice.

MI00131147



SOURCE: USGS QUADRANGLE MAP;
INKSTER, MICHIGAN

figure 1

SITE LOCATION
EAGLEPICHER - WOLVERINE GASKET
Inkster, Michigan

42354-07(MDEQ001)GN-DE001 MAR 31/2006

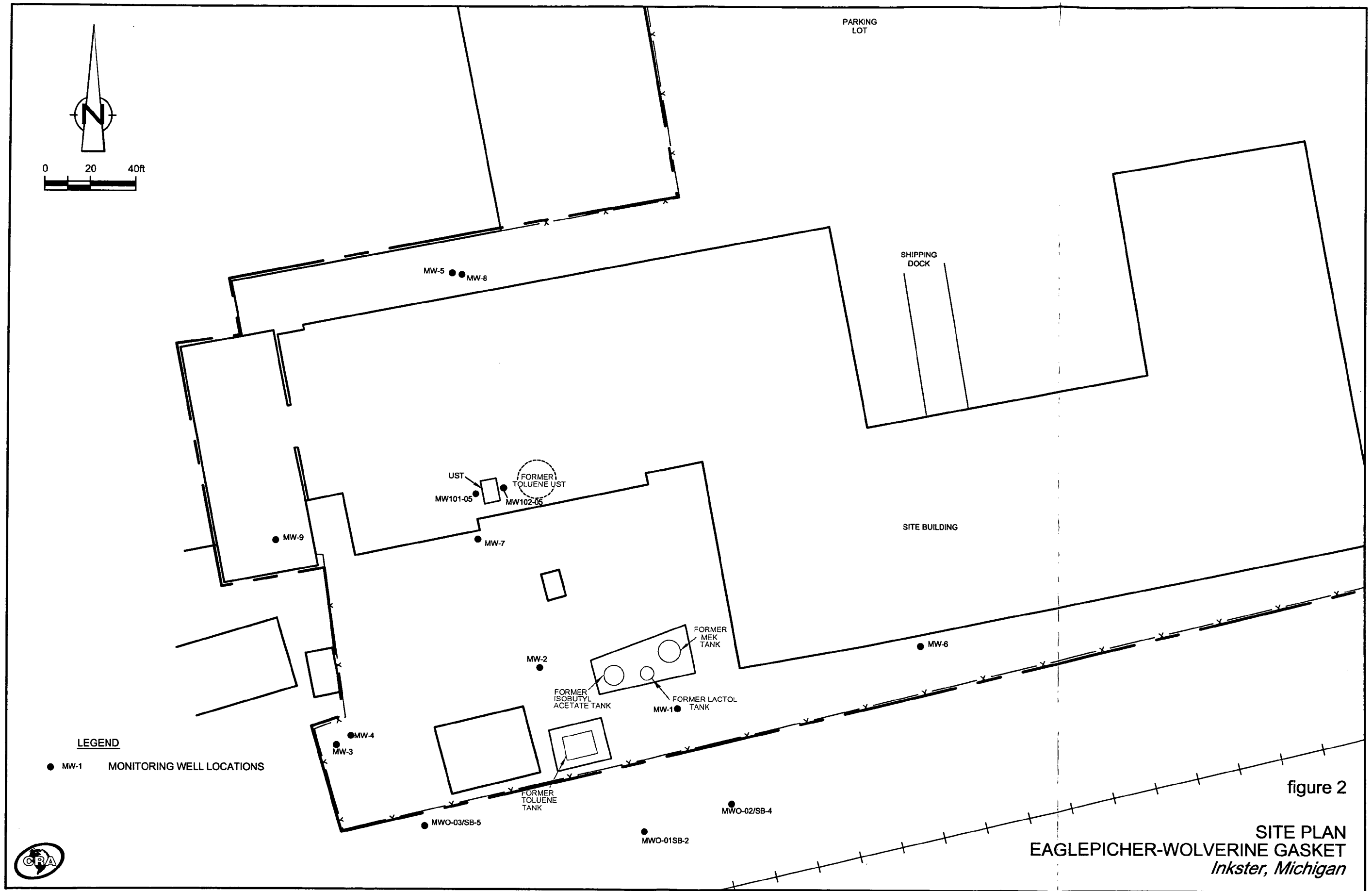


figure 2

SITE PLAN
EAGLEPICHER-WOLVERINE GASKET
Inkster, Michigan

42354-04(MDEQ001)GN-DE001 APR 07/2006

MI0013149

CONESTOGA-ROVERS
& ASSOCIATES

14496 Sheldon Road, Suite #200, Plymouth, MI 48170
Telephone: 734-453-5123 Facsimile: 734-453-5201
www.CRAworld.com

April 7, 2006

Reference No. 42354

Jeff Lippert
MDEQ, RRD
Southeast Michigan District Office
27700 Donald Court
Warren, Michigan 48092-2793

Dear Mr. Lippert:

Re: Notice of Migration of Contamination
2638 Princess Street
Inkster, Michigan 48141

On March 8, 2006 EaglePicher met with the Michigan Department of Environmental Quality (MDEQ) to discuss the ongoing groundwater remediation efforts being conducted under Part 201. The MDEQ requested that EaglePicher submit a NOM to applicable parties within 30 days of the meeting. As required under R 299.5522 and R 299.51017, promulgated under the authority of Part 201, Public Act 451, as amended, Conestoga-Rovers & Associates (CRA) is submitting the attached Notice of Migration of Contamination (NOM) form on behalf of EaglePicher Automotive (EaglePicher). The NOM includes a listing of each of the parties notified.

Based on analytical data from groundwater samples that EaglePicher collected at their Wolverine Gasket, Inkster facility, shallow perched groundwater containing benzene and chlorobenzene has migrated off-site at levels exceeding MCL 324.20120a(1)(a). Benzene (10 ug/l) and chlorobenzene (510 ug/l) have migrated off-site to the south (MWO-02). Additionally, a well (MW-9) less than 30 feet from the western property boundary has benzene (31,000 ug/l) and chlorobenzene (4,900 ug/l) present at levels indicating these constituents may be present in the groundwater to the west of the facility at levels exceeding MCL 324.20120a(1)(a). Additionally, a well (MW-8) less than 15 feet from the north-northwest property boundary has benzene (46 ug/l) and chlorobenzene (910 ug/l) present at levels indicating these constituents may have migrated off-site to the north-northwest at levels exceeding MCL 324.20120a(1)(a).

EaglePicher is continuing its efforts to delineate further the extent of shallow groundwater impact to the south, west, and north-northwest of their Facility.

CONESTOGA-ROVERS
& ASSOCIATES

Should you have any questions regarding this submittal, please contact the undersigned.

Yours truly,

CONESTOGA-ROVERS & ASSOCIATES

Thomas Kinney

Thomas M. Kinney, CPG

TMK/1/Det.
Encl.

c.c.: Doug Rommeck, EaglePicher Automotive

EQUAL EMPLOYMENT OPPORTUNITY EMPLOYER

MI0013151

MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
REMEDIATION AND REDEVELOPMENT DIVISION

For DEQ Use Only
ITS # _____
Site ID #_____
Category Code: _____

NOTICE OF MIGRATION OF CONTAMINATION

(Under the authority of Part 201, Natural Resources and Environmental Protection Act, 1994 Act 451, as amended, (NREPA) and the Rules promulgated thereunder)

An owner or operator of property that is a facility, and/or who is subject to MCL 324.20114, and who has reason to believe that a hazardous substance is emanating from, has emanated from, or is likely to be emanating from the property and migrating beyond the boundaries of the property that he or she owns or operates is required under R 299.5522 and R 299.51017(1) to notify the Michigan Department of Environmental Quality ("DEQ") and affected property owners, unless he or she is exempt from MCL 324.20107a (see MCL 324.20107a(4) for exemptions), or unless he or she has provided the notice required by MCL 324.21309a. Submission of this notice does not fulfill the notification requirements of MCL324.21309a.

The notice must be provided within 45 days after the owner or operator has reason to believe that hazardous substances have migrated, or are likely to have migrated, to or beyond the boundary of his or her property (see R 299.51017 and R 299.5522 for exceptions). If a person is required to provide additional notice as a result of the changes in R 299.51017 that took effect on December 21, 2002, then that additional notice shall be provided not later than September 21, 2003.

Use of this form is mandatory for the notice required by R 299.51017(1) and may also be used by parties subject to MCL 324.20114 to provide notice required by R 299.5522. This form may also be used to provide notice to affected property owners as required by those rules.

If a person holds a permit for an oil and gas well under Part 615, Supervisor of Wells, of the NREPA and there is a release from the oil and gas exploration or production activities, that person shall give notice to the DEQ and to the owner of the surface rights of the property.

If a person holds an easement and there is a release from the easement holder's activities, that person shall provide notice to the DEQ and to the grantor of the easement, or the grantor's successor in interest, if any.

Completing this notice in no way relieves a person who is subject to MCL 324.20114 from the responsibility to undertake required response activities.

This notice must be sent to the DEQ office that serves the county in which the property is located. A list of DEQ offices is available at www.michigan.gov/bea, or by calling the Remediation and Redevelopment's Lansing office at 517-373-9837. The DEQ will not prepare acknowledgement of receipt of these notices. The sender is responsible for sending the report using a method that provides proof of delivery if such proof is desired. Please label the outside of the envelope "Migration Notice." Additional guidelines for the compliance with the requirements of R 200.51017(1) or R 299.5522 are available at www.michigan.gov/bea.

THIS NOTICE IS PROVIDED PURSUANT TO: **R 299.5522** ☒ **R 299.51017** ☒
(check both, if applicable)

Please provide the following information as completely as possible.

1. Name and location of the property that hazardous substances are emanating from:

   Name: EaglePicher Automotive
   Address: 2638 Princess Street
   Location:
   City/County: Inkster / Wayne
   Property Tax Identification Number, or if applicable, the ward and item number: 021 99 0010 001 & 021 99 0010 707

2. Status relative to the property:
   (Check one or both, as applicable.)

   Owner ☒
   Operator ☒

Provide any additional ID numbers associated with the property (e.g., EPA ID No., BEA No., Part 213 facility ID No., etc.):

3. Name, address, and telephone number of the property owner, operator, or other party submitting the notice:
   Name: EaglePicher Automotive
   Address: 2638 Princess Street
   City/State: Inkster / MIchigan
   Telephone number: (313) 724-2006

4. Name, address and telephone number of a contact person familiar with the content of the notice:
   Name: Tom Kinney of Conestoga-Rovers and Associates, Inc. (CRA)
   Address: 14496 N. Sheldon Road
   City/State: Plymouth / MI
   Telephone: (734) 453-5123

5. If this Notice is provided pursuant to R 299.51017, provide the address and other location information for the *adjacent* property(s) onto which contamination is migrating, has migrated, or is likely to migrate. If this Notice is provided pursuant to R 299.5522, provide the address and other location information for *each* property onto which contamination has migrated. Notice should be sent to the property owner of record. If the impacted property is owned by the State of Michigan, notice should be sent to the department managing the property (i.e. a prison, state park, etc.). Notices to the Michigan Department of Transportation (MDOT) for state owned roadways should be sent to Ms. Heather Hicks, MDOT-Bureau of Transportation Planning, 425 W. Ottawa Street, P.O. Box 30050, Lansing, MI 48989. If it isn't readily apparent what state department manages the property, notices should be sent to Mr. Thomas Saxton, Tenant and Land Services, Department of Management and Budget, 1st Floor Lewis-Cass Building, P.O. Box 30026, Lansing, MI 48909.

Address: 2640 Princess St.
City/State: Inkster / MI 48141
Property Tax ID number: 021 99 0010 706
Other: Richwall Custom Cabinetry

Notified? No ☐ Yes ☒ Date: April 7, 2006

Address: 8505 Terra Bella Dr.
City/State: Northville / MI 48167
Property Tax ID number: 021 99 0010 004
Other: Prep LLC

Notified? No ☐ Yes ☒ Date: April 7, 2006

Address: 535 Berwyn
City/State: Dearborn Heights / MI 48127
Property Tax ID number: 021 99 0010 005
Other: Asard, John

Notified? No ☐ Yes ☒ Date: April 7, 2006

Address: Ms. Pauline Mapp
Law Department, Box 241
Norfolk Southern Corporation
Three Commercial Place
City/State: Norfolk, Virginia 23510
Property Tax ID number: 021 99 0008 000

Notified? No ☐ Yes ☒ Date: April 7, 2006

Address:
City/State:
Property Tax ID number:
Other:

Notified? No ☐ Yes ☐ Date:

(Attach additional pages as needed)

6. Complete the Table on Page 3 of this Form for each hazardous substance which has migrated, or is likely to have migrated, beyond the property boundary at a concentration that exceeds a Generic Residential Cleanup Criterion developed by the DEQ pursuant to MCL 324.20120a(1). Complete and attach additional copies of Page 3, if necessary, to list all hazardous substances that must be reported. Include a scaled map or drawing that shows the location of sampling points identified on the Table on Page 3, the property boundaries, and the adjacent property owners if providing notice pursuant to R 299.1017(1) or all impacted property owners if providing notice pursuant to Rule 299.5522.

7. Provide a summary of the information which shows that contamination is emanating from, or has emanated from, and is present beyond the boundary of the source property at a concentration which exceeds that allowed by MCL 324.20120a(1)(a). This summary shall identify the environmental media affected, specific hazardous substances, and the concentrations of those hazardous substances in all affected environmental media at the property boundary and in any sample locations beyond the property boundary. The summary shall also describe the basis for the conclusion that the contamination is emanating, has emanated, or is present beyond the boundary of the source property, including whether the conclusion is based on groundwater analytical data or fate and transport modeling, both, or neither.

   Based on analytical data from groundwater samples that EaglePicher collected at their Wolverine Gasket, Inkster facility, shallow perched groundwater containing benzene (10 ug/l) and chlorbenzene (510 ug/l) has migrated off-site to the south (MWO-02). Additionally, a well (MW-9) less than 30 feet from the western property boundary has benzene (31,000 ug/l) and chlorbenzene (4,900 ug/l) indicating these constituents may be present in the groundwater to the west of the facility at levels exceeding MCL 324.20120a(1)(a). Additionally, a well (MW-8) less than 15 feet from the north-northwest property boundary has benzene (46 ug/l) and chlorbenzene (910 ug/l) indicating these constituents may have migrated off-site to the north-northwest at levels exceeding MCL 324.20120a(1)(a).

8. If the person making this notice has reason to believe that a migrating hazardous substance has affected, or is likely to affect, a private or public water supply, then that water supply must be identified here: ***Not applicable***

	YES	NO
9. Is this notice being submitted within the timeframes established under R 299.5522 and/or R 299.51017, as applicable?	☒	☐
10. Is this notice in addition to a notice submitted prior to *December 21, 2002?* (R 299.51017(4)(c))	☐	☒
11. Is this notice related to an oil and gas well permit (R 299.51017(2))? Permit #:	☐	☒
12. Is this notice related to an easement (R 299.51017(3))? (NOTE: All easement grantors *must* receive this notice.)	☐	☒
13. Has surface water been affected (R 299.51017(1) and R 299.5522(2))? (If yes, please identify the affected surface water body.)	☐	☒

CERTIFICATION:

With my signature below, I certify that I am the owner of the facility or that I am legally authorized to execute this notice on behalf of the owner or operator named on this form, and that to the best of my knowledge and belief the above representations are complete and accurate. I understand that intentionally submitting false information to the DEQ is a felony and may result in fines up to $25,000 for each violation.

Signature _____ Date _____
(Owner or person legally authorized to bind the person making this report)

Name (Typed or Printed) _____

Title (Typed or Printed) _____

See Item 6 on Page 2 of this Form for instructions to be used in completing this Table. Attach additional pages if necessary. The information to be included in each column of the Table is:

Column A Name of hazardous substance.
Column B Chemical Abstract Service (CAS) Number for the hazardous substance.
Column C Maximum hazardous substance concentration measured on the property, expressed in parts per billion (e.g., ug/L or ug/Kg). Report maximum concentration separately for each environmental medium.
Column D Sample location for Column C (relate to label on map).
Column E Environmental medium in which concentration reported in Column C was measured (e.g., soil or groundwater).
Column F Distance from point of maximum measured concentration (Column D) to property boundary, in direction of contaminant migration, if direction is known or can reasonably be inferred. If direction is unknown, list distance to nearest property boundary.
Column G Direction of contaminant migration, if known.
Column H Concentration closest to property boundary, if known. If a concentration lower than the maximum concentration reported in Column C has been measured at a point closer to the property boundary in the direction of contaminant migration, use Column I to list the concentration that was measured closest to the property boundary in the direction of contaminant migration.
Column I Sample location for Column H (relate to label on map).
Column J Environmental medium for measurement reported in Column H, if applicable.

A Hazardous Substance	B CAS Number	C Maximum Concentration ug/l	D Sample Location for "C"	E Environmental Medium for "C"	F Distance to Property Boundary	C Maximum Concentration ug/l	H Boundary Concentration ug/l	I Sample Location for "H"	J Environmental Medium for "H"
Benzene	71432	41,000	MW102-05	Groundwater	110 feet	Variable Depending on Season	31,000	MW-9	Groundwater
Chlorobenzene	108907	110,000	MW102-05	Groundwater	110 feet	Variable Depending on Season	4,900	MW-9	Groundwater
Ethylbenzene	100414	4,700	MW102-05	Groundwater	110 feet	Variable Depending on Season	Non-detect	MW-9	Groundwater
Toluene	108883	9,700	MW-7	Groundwater	130 feet	Variable Depending on Season	Non-detect	MW-9	Groundwater
Xylenes	1330207	19,000	MW102-05	Groundwater	110 feet	Variable Depending on Season	Non-detect	MW-9	Groundwater
MEK	78933	17,000	MW102-05	Groundwater	110 feet	Variable Depending on Season	Non-detect	MW-9	Groundwater

Total Number Samples Collected: 44 collected since 6/04 Total Number of Samples Exceeding Criteria: 31
A scaled map or drawing showing these locations and the property boundaries must be submitted with this Notice

MI0013155

See Item 6 on Page 2 of this Form for instructions to be used in completing this Table. Attach additional pages if necessary. The information to be included in each column of the Table is:

Column A Name of hazardous substance.
Column B Chemical Abstract Service (CAS) Number for the hazardous substance.
Column C Maximum hazardous substance concentration measured on the property, expressed in parts per billion (e.g., ug/L or ug/Kg). Report maximum concentration separately for each environmental medium.
Column D Sample location for Column C (relate to label on map).
Column E Environmental medium in which concentration reported in Column C was measured (e.g., soil or groundwater).
Column F Distance from point of maximum measured concentration (Column D) to property boundary, in direction of contaminant migration, if direction is known or can reasonably be inferred. If direction is unknown, list distance to nearest property boundary.
Column G Direction of contaminant migration, if known.
Column H Concentration closest to property boundary, if known. If a concentration lower than the maximum concentration reported in Column C has been measured at a point closer to the property boundary in the direction of contaminant migration, use Column I to list the concentration that was measured closest to the property boundary in the direction of contaminant migration.
Column I Sample location for Column H (relate to label on map).
Column J Environmental medium for measurement reported in Column H, if applicable.

A Hazardous Substance	B CAS Number	C Maximum Concentration ug/l	D Sample Location for "C"	E Environmental Medium for "C"	F Distance to Property Boundary	G Direction of Migration	H Boundary Concentration ug/l	I Sample Location for "H"	J Environmental Medium for "H"
Benzene	71432	41,000	MW102-05	Groundwater	110 feet	Variable Depending on Season	46	MW-8	Groundwater
Chlorobenzene	108907	110,000	MW102-05	Groundwater	110 feet	Variable Depending on Season	910	MW-8	Groundwater
Ethylbenzene	100414	4,700	MW102-05	Groundwater	110 feet	Variable Depending on Season	29	MW-8	Groundwater
Toluene	108883	9,700	MW-7	Groundwater	130 feet	Variable Depending on Season	58	MW-8	Groundwater
Xylenes	1330207	19,000	MW102-05	Groundwater	110 feet	Variable Depending on Season	110	MW-8	Groundwater
MEK	78933	17,000	MW102-05	Groundwater	110 feet	Variable Depending on Season	15	MW-8	Groundwater

Total Number Samples Collected: 44 collected since 6/04 Total Number of Samples Exceeding Criteria: 31
A scaled map or drawing showing these locations and the property boundaries must be submitted with this Notice.

MI0013156

See Item 6 on Page 2 of this Form for instructions to be used in completing this Table. Attach additional pages if necessary. The information to be included in each column of the Table is:

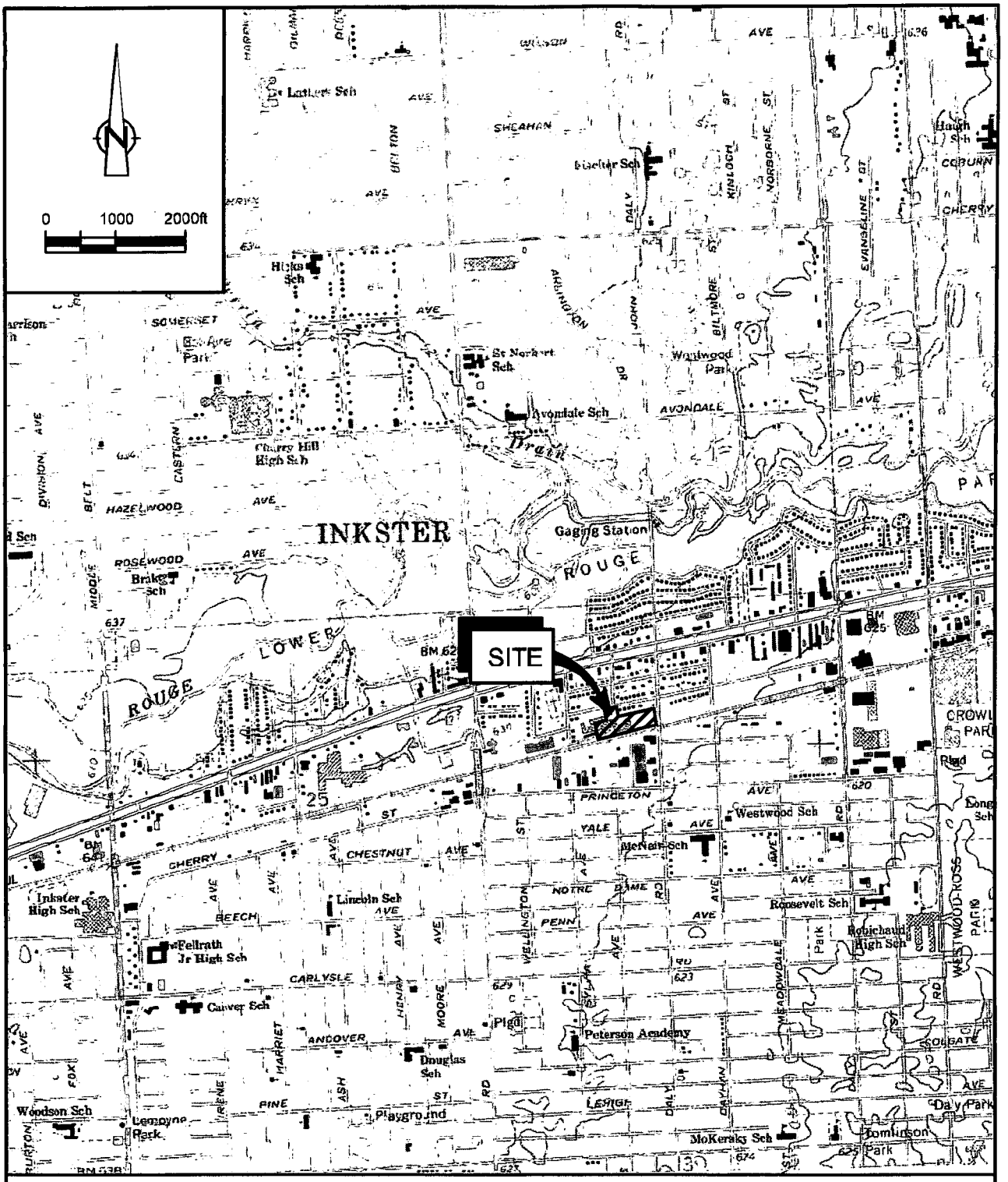
Column A Name of hazardous substance.
Column B Chemical Abstract Service (CAS) Number for the hazardous substance.
Column C Maximum hazardous substance concentration measured on the property, expressed in parts per billion (e.g., ug/L or ug/Kg). Report maximum concentration separately for each environmental medium.
Column D Sample location for Column C (relate to label on map).
Column E Environmental medium in which concentration reported in Column C was measured (e.g., soil or groundwater).
Column F Distance from point of maximum measured concentration (Column D) to property boundary, in direction of contaminant migration, if direction is known or can reasonably be inferred. If direction is unknown, list distance to nearest property boundary.
Column G Direction of contaminant migration, if known.
Column H Concentration closest to property boundary, if known. If a concentration lower than the maximum concentration reported in Column C has been measured at a point closer to the property boundary in the direction of contaminant migration, use Column I to list the concentration that was measured closest to the property boundary in the direction of contaminant migration.
Column I Sample location for Column H (relate to label on map).
Column J Environmental medium for measurement reported in Column H, if applicable.

A Hazardous Substance	B CAS Number	C Maximum Concentration ug/l	D Sample Location for "C"	E Environmental Medium for "C"	F Distance to Property Boundary	G Direction of Migration	H Boundary Concentration ug/l	I Sample Location for "H"	J Environmental Medium for "H"
Benzene	71432	41,000	MW102-05	Groundwater	110 feet	Variable Depending on Season	10	MWO-02	Groundwater
Chlorobenzene	108907	110,000	MW102-05	Groundwater	110 feet	Variable Depending on Season	510	MWO-02	Groundwater
Ethylbenzene	100414	4,700	MW102-05	Groundwater	110 feet	Variable Depending on Season	Non-detect	MWO-02	Groundwater
Toluene	108883	9,700	MW-7	Groundwater	130 feet	Variable Depending on Season	Non-detect	MWO-02	Groundwater
Xylenes	1330207	19,000	MW102-05	Groundwater	110 feet	Variable Depending on Season	Non-detect	MWO-02	Groundwater
MEK	78933	17,000	MW102-05	Groundwater	110 feet	Variable Depending on Season	Non-detect	MWO-02	Groundwater

Total Number Samples Collected: 44 collected since 6/04 Total Number of Samples Exceeding Criteria: 31

A scaled map or drawing showing these locations and the property boundaries must be submitted with this Notice

MI0013157



SOURCE: USGS QUADRANGLE MAP;
INKSTER, MICHIGAN

figure 1

SITE LOCATION
EAGLEPICHER - WOLVERINE GASKET
Inkster, Michigan

42354-07(MDEQ001)GN-DE001 MAR 31/2006

MI0013158

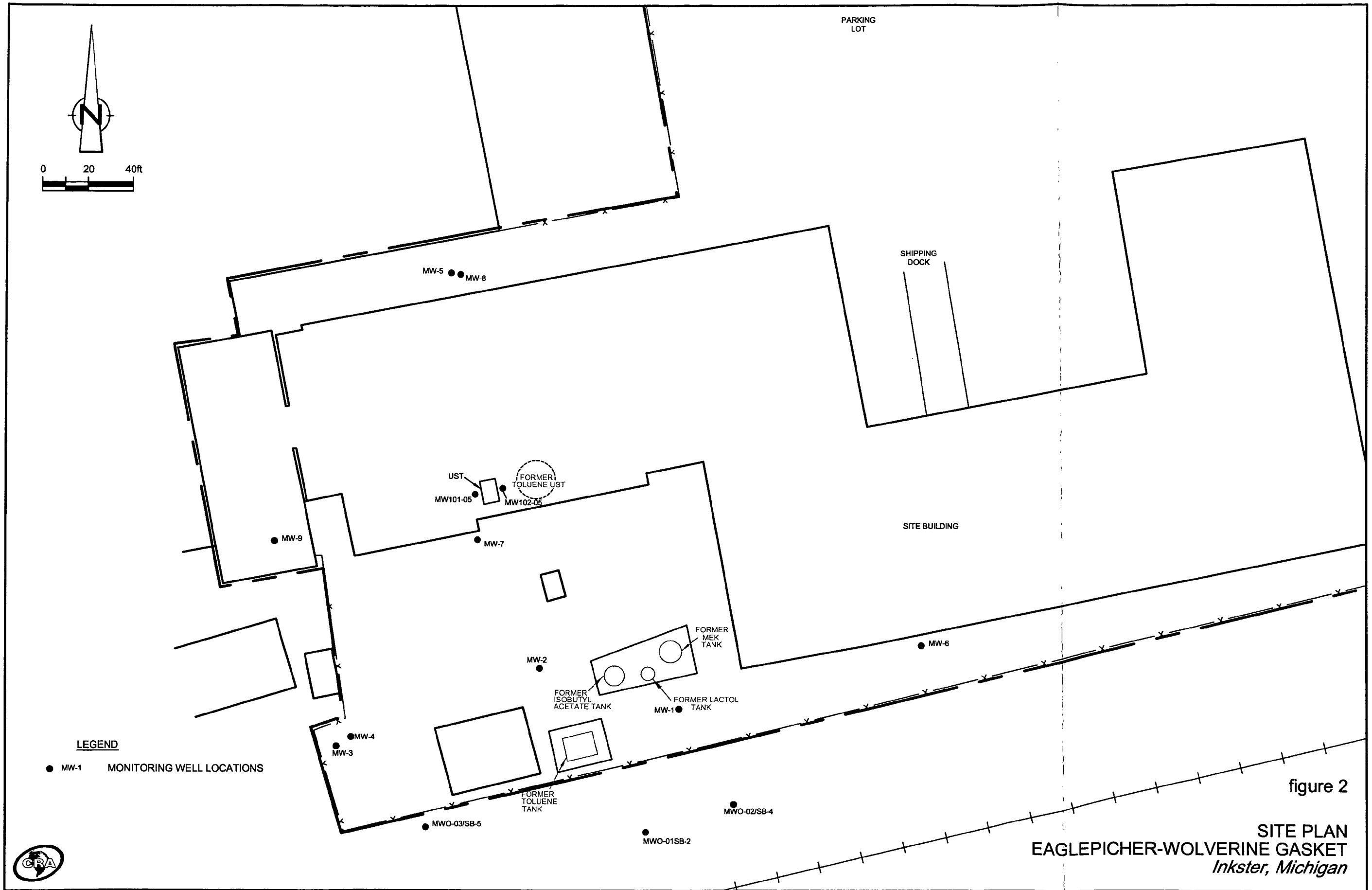


figure 2

SITE PLAN
EAGLEPICHER-WOLVERINE GASKET
Inkster, Michigan

42354-04(MDEQ001)GN-DE001 APR 07/2006

MI0013159

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
SOUTHEAST MICHIGAN DISTRICT OFFICE

JENNIFER M. GRANHOLM
GOVERNOR

STEVEN E. CHESTER
DIRECTOR

February 14, 2006

Mr. Douglas Rommeck, Manager
Health, Safety and Environment
EaglePicher Automotive
2424 John Daly Road
Inkster, Michigan 48141

Dear Mr. Rommeck:

SUBJECT: Part 201 Remedial Activities Summary Report
EaglePicher, Wolverine Gasket
2638 Princess Street, Inkster, Wayne County, Michigan

The Department of Environmental Quality (DEQ), Remediation and Redevelopment Division (RRD) is in receipt of a "Part 201 Remedial Activities Summary" (Report) written and submitted by Conestoga-Rovers & Associates (CRA) on behalf of EaglePicher Automotive (EaglePicher). According to CRA, the report describes historical remediation efforts, remedial activities conducted since 2004, and planned future activities.

The Report presents a summary of the groundwater remedial activities conducted in response to contamination of soil and groundwater in excess of cleanup criteria specified in Part 201 of the Natural Resources and Environmental Protection Act (NREPA), PA 451 of 1994, as amended, Administrative Rules. The DEQ has reviewed the report and formulated the following general comments:

- Pursuant to R299.5528(1), and R299.5528(3)(a), the nature and extent of the contamination need to be identified and defined. It does not appear that the extent of impacted soil and groundwater above generic residential criteria has been adequately defined. This includes the area under the building and along property lines.

- Pursuant to R299.5526(1)(g) and R299.5532(7), source control is required. The injection of hydrogen peroxide and Fenton's Reagent is intended to treat groundwater only. Impacted soil will continue to be a source and contaminate the groundwater. There is no mention of planned soil remediation beyond the excavation that took place in October 2004.

- Pursuant to R299.5705(5)and (6), the extent of impacted groundwater must not expand as a result of the remedy. Additionally, it must be demonstrated that the contaminants are actually removed or destroyed by the remedy, not simply diluted. The exception to this would be to obtain a departmental waiver as provided in Section 20118(5) and (6) of the Act. Therefore, CRA must demonstrate that migration will not occur as a result of the injections. The information needed to make the demonstration would include such things as the volume and concentrations of hydrogen peroxide and Fenton's Reagent injected as well as method, pressure, and rate of injection. Monitoring wells may be needed to verify expansion of the plume, especially expansion off-site, is not occurring.

- If EaglePicher wishes to continue to inject hydrogen peroxide or any other additive into the groundwater as part of the site remedy, pursuant to the Part 22 Rules of Part 31 of Act 451, a groundwater discharge permit or a DEQ approved plan is required prior to any discharge to groundwater. In this case, approval of an Interim Response Action Plan (IRAP), Interim Response Designed to Meet Criteria (IRDC), or Remedial Action Plan (RAP) that fulfills all the requirements of R299.5526 or R299.5532 as applicable is required.

- Pursuant to Draft Operation Memo No. 4, Attachment 9, the DEQ has expressed concerns about the injection of chemicals that cause in situ chemical oxidation or are designed to enhance bioremediation. The concerns include such items as mobilizing metals by the injecting chemicals, expanding the extent of contamination, the potential for gases to accumulate in basements and utility vaults and off gassing of volatiles. A plan that addresses the above issues and any other similar applicable items needs to be included in any IRAP, IRDC, or RAP that proposes an injection as part of a remedy.

- Pursuant to R299.5716(16), storm sewers are a groundwater surface water interface criteria (GSI) compliance point. To determine if GSI or groundwater surface water protection criteria (GSIPC) is applicable, the final destination of the storm sewers needs to be identified (i.e., are they connected to a sanitary sewer or do they discharge directly to surface water?).

- MW-5 is completed in a 5-foot thick silt layer of unknown horizontal extent approximately 20-feet below the top of the clay layer. None of the other borings in the cross sections went deep enough to encounter the silt layer.

  Pursuant to R324.20118(6)(d)(i), EaglePicher should review the construction of MW-5 to ensure that it is not acting as a conduit for the migration of contamination to the silt layer.

- There is one Notice of Migration form in the DEQ file. This Notice does not indicate what property owner(s) was/were notified. Pursuant to R 299.5522 or R299.1017, EaglePicher should supply the names and locations of those notified. Additionally, if it is reasonable to assume contamination has migrated off-site, EaglePicher must notify the property owner of the impacted property. Additionally, pursuant to R299.51013(6), notification applies to easement holders of record, utility franchise holders of record, and owner/operator of public utilities that serve the property.

- Concentrations of contaminants above soil saturation screening levels (Csat) are present throughout the site. Therefore, pursuant to R299.5706a(2)(a), EaglePicher must demonstrate that free product is not present. Additionally, some of the algorithms used to determine the clean up criteria are not valid if concentrations above Csat are present in the soil.

- EaglePicher may have Due Care responsibilities. Concentrations in excess of Commercial/Industrial Soil Volatilization to Indoor Air Criteria (SVIAIC) are present under the building as evidenced by the analytical data for soil samples collected from borings MW-9 and GP6-04. Additionally, the concentration of benzene from a sample collected from MW-09 is in excess of the applicable Groundwater Volatilization to Indoor Air Criterion. The extent of the exceedences in soil and groundwater are not defined. EaglePicher should review their responsibility under 20107a of the Act and Part 10 of the Part 201 Rules.

In summary, the treatment being used is not designed to remediate impacted soil in the Vadose zone. CRA has not asserted that oxygen from the injections will have any effect stimulating biodegradation of the contamination in the Vadose zone. If this is what they anticipate to occur, they will have to submit a plan to verify this is occurring. Continued injections of hydrogen peroxide and Fenton's Reagent without addressing the high concentrations of contaminants in the soil will most likely not produce the desired results. Any reduction in concentrations of contaminant will likely be temporary.

Additionally, the extent of impacted soil and groundwater is not defined and the groundwater flow is not fully understood. Additional soil borings and monitoring wells, including some off-site, are needed to define the extent of contamination as well as demonstrate the injections are not exacerbating the contamination.

Concentrations of contaminants exceed Csat throughout the site. Of immediate concern is the presence of concentrations of volatile organic compounds (VOCs) above soil and groundwater volatilization to indoor air criteria under the building. EaglePicher should review their Due Care responsibilities under 20107(a) and Part 10 or the 201 Rules.

Enclosed is the DEQ's Geological Review of CRA's report. The Geological Review supplies greater detail and additional comments regarding the report.

The DEQ is tentatively scheduled to meet with EaglePicher and CRA on Wednesday, March 8, 2006, at 10:30 am at the DEQ Southeast Michigan District Office. At the meeting, we can discuss the above listed deficiencies in more detail.

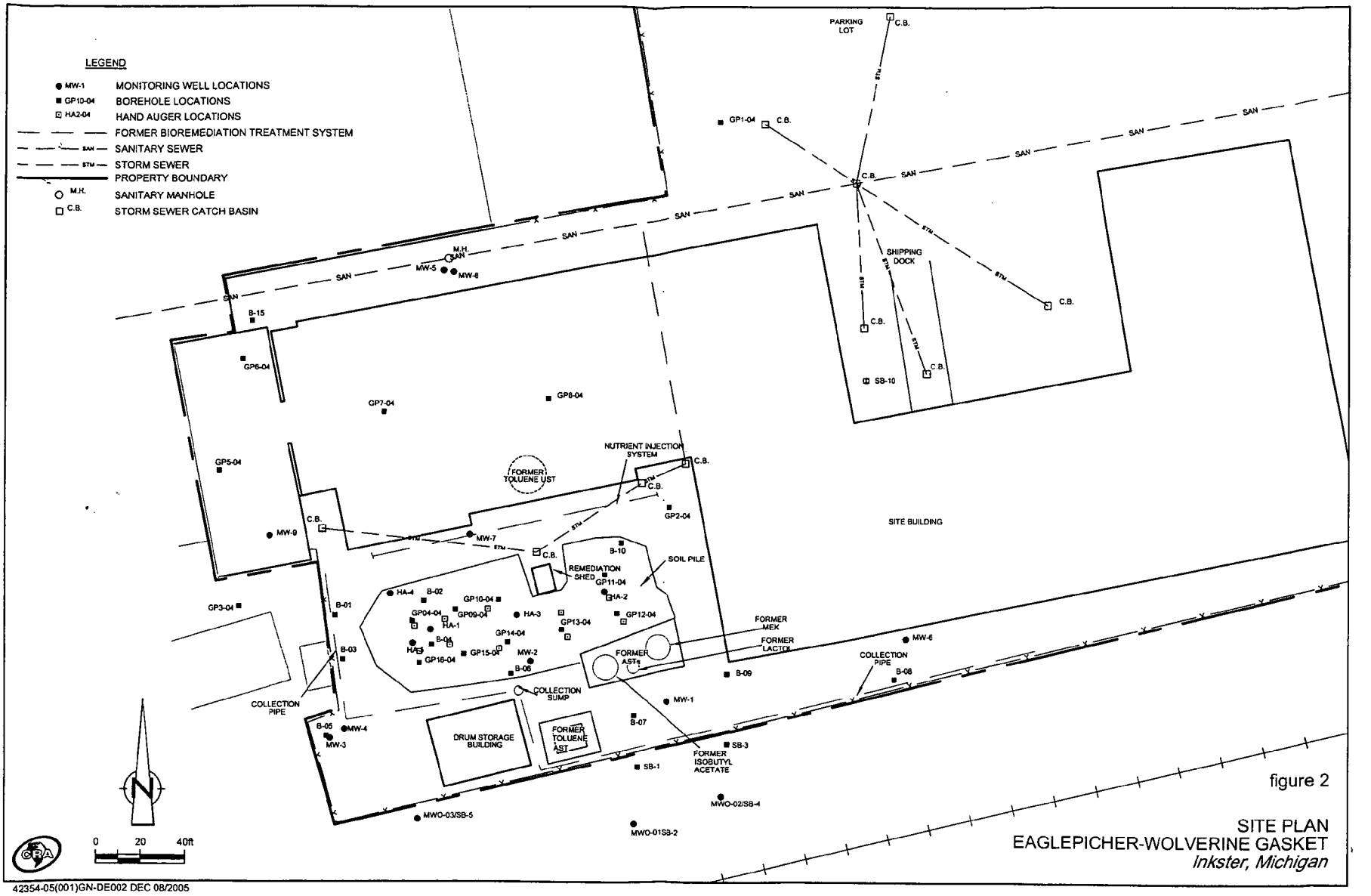
Please feel free to contact me with any questions.

Sincerely,

Jeffrey A. Lippert
Environmental Quality Analyst
Southeast Michigan District Office
Remediation and Redevelopment Division
586-753-3857

Enclosure

cc: Mr. Oladipo Oyinsan, DEQ
Ms. Jeanne Schlaufman, DEQ
Mr. Michael Wilczynski, DEQ



42354-05(001)GN-DE002 DEC 08/2005

figure 2

SITE PLAN
EAGLEPICHER-WOLVERINE GASKET
Inkster, Michigan

MI0013164

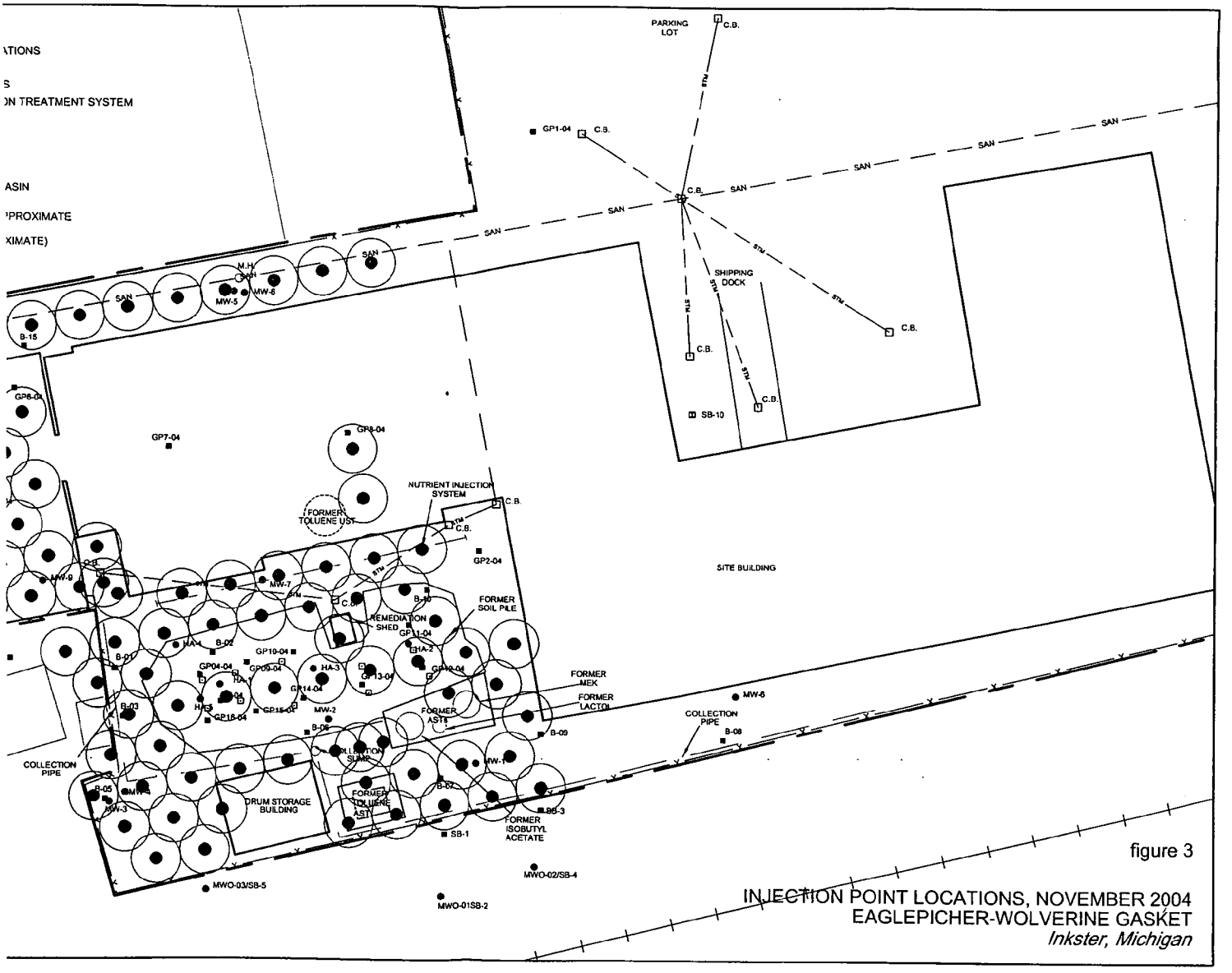


figure 3

INJECTION POINT LOCATIONS, NOVEMBER 2004
EAGLEPICHER-WOLVERINE GASKET
Inkster, Michigan

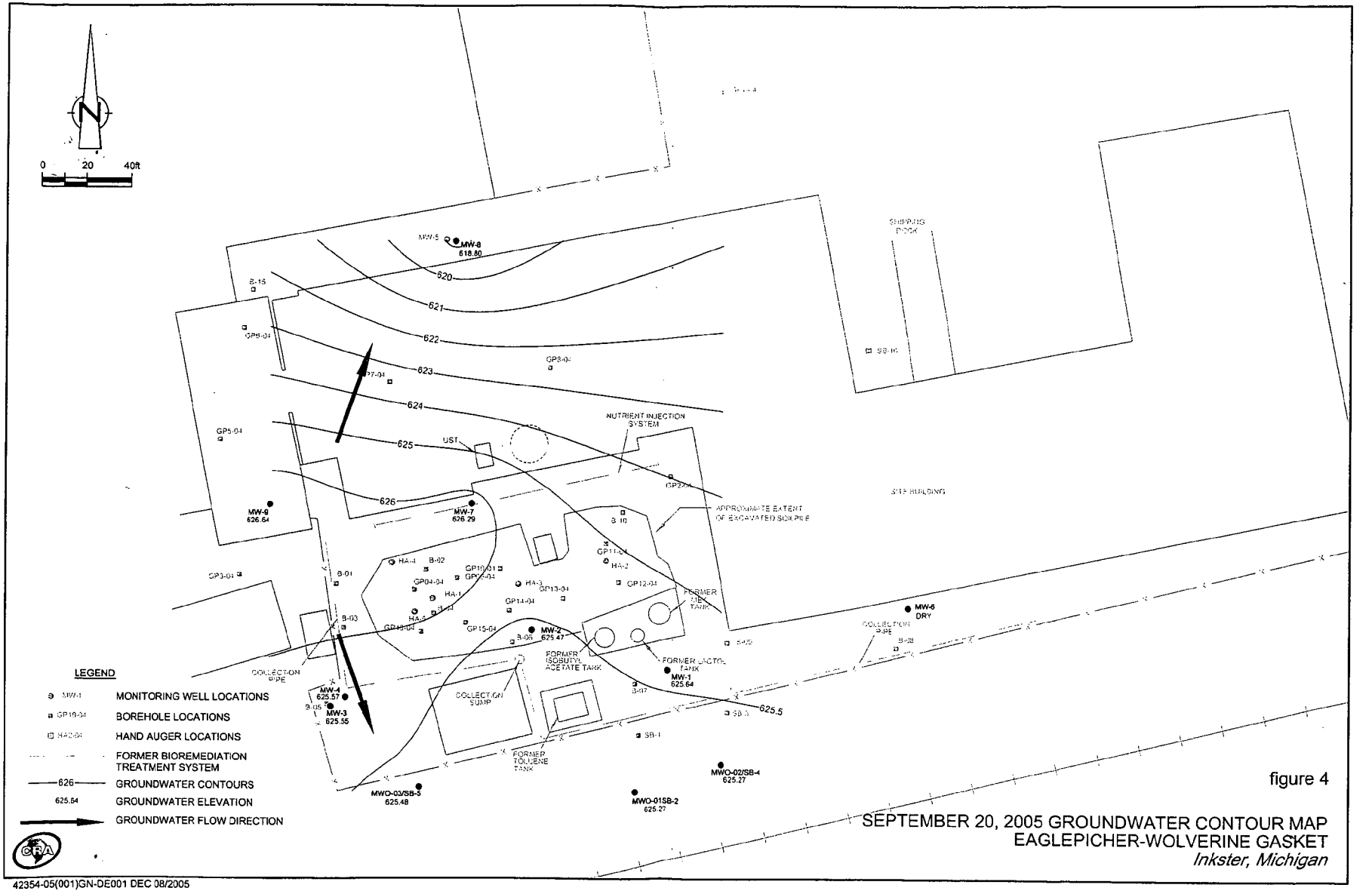
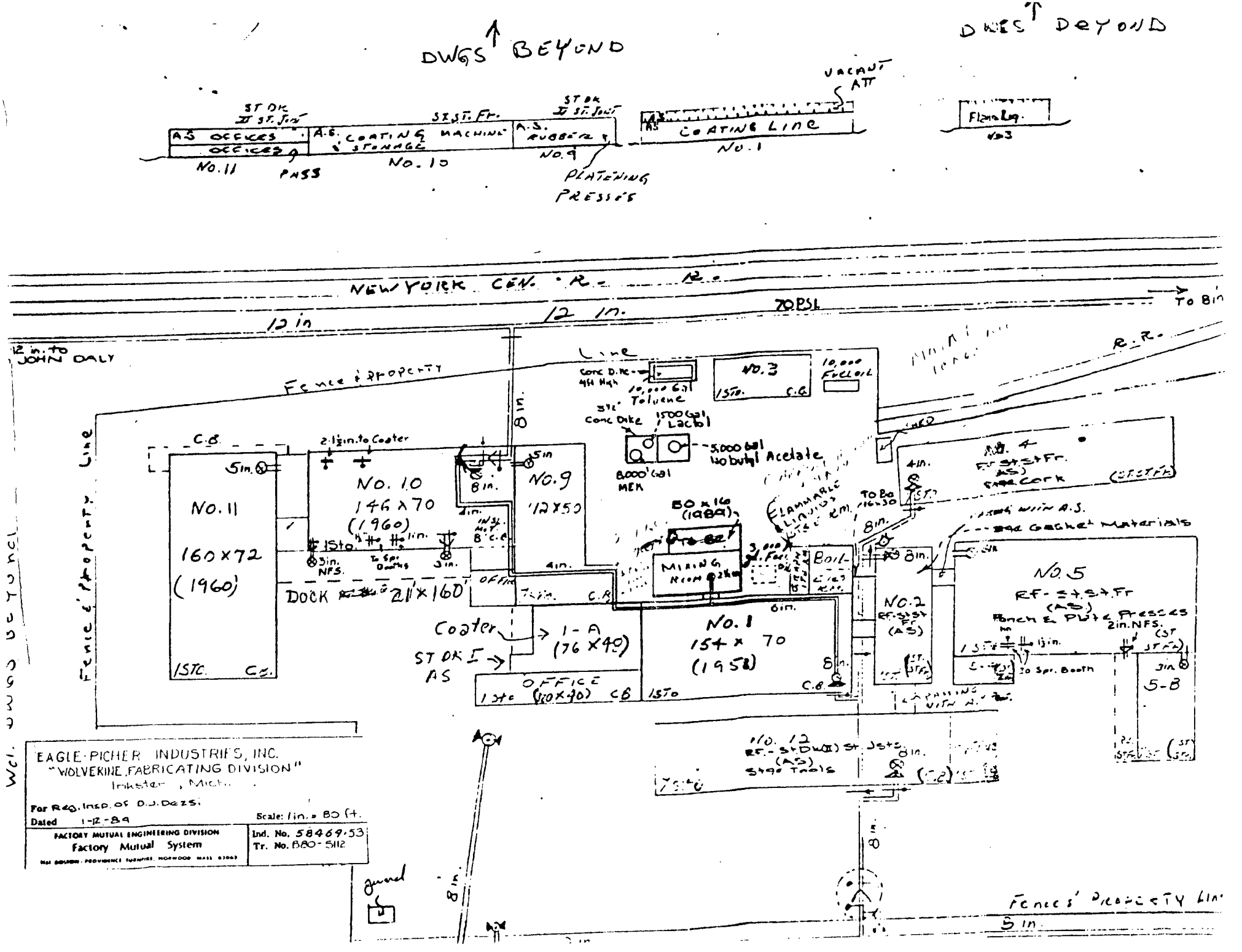


figure 4

SEPTEMBER 20, 2005 GROUNDWATER CONTOUR MAP
EAGLEPICHER-WOLVERINE GASKET
Inkster, Michigan

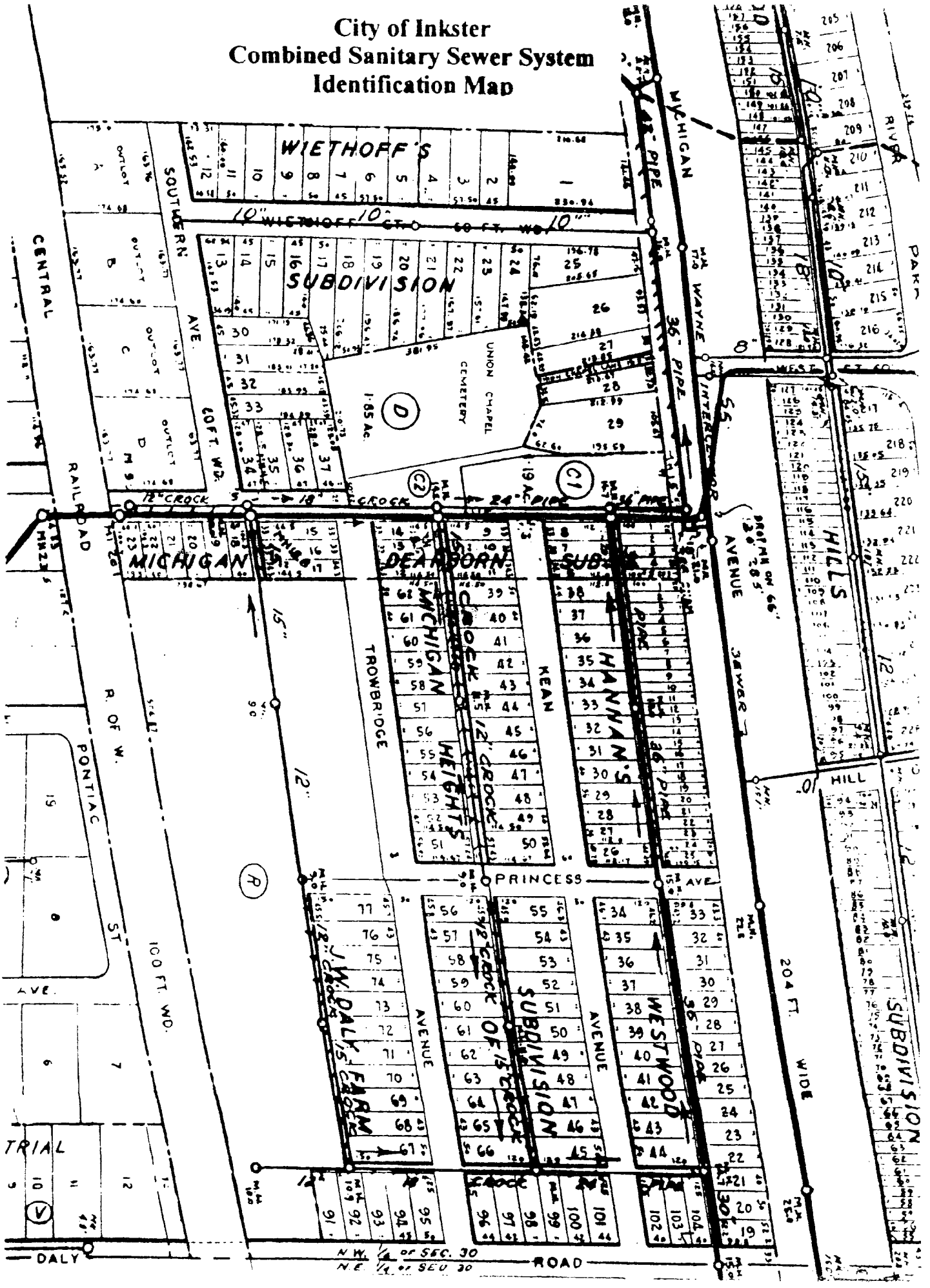
42354-05(001)GN-DE001 DEC 08/2005

MI0013166

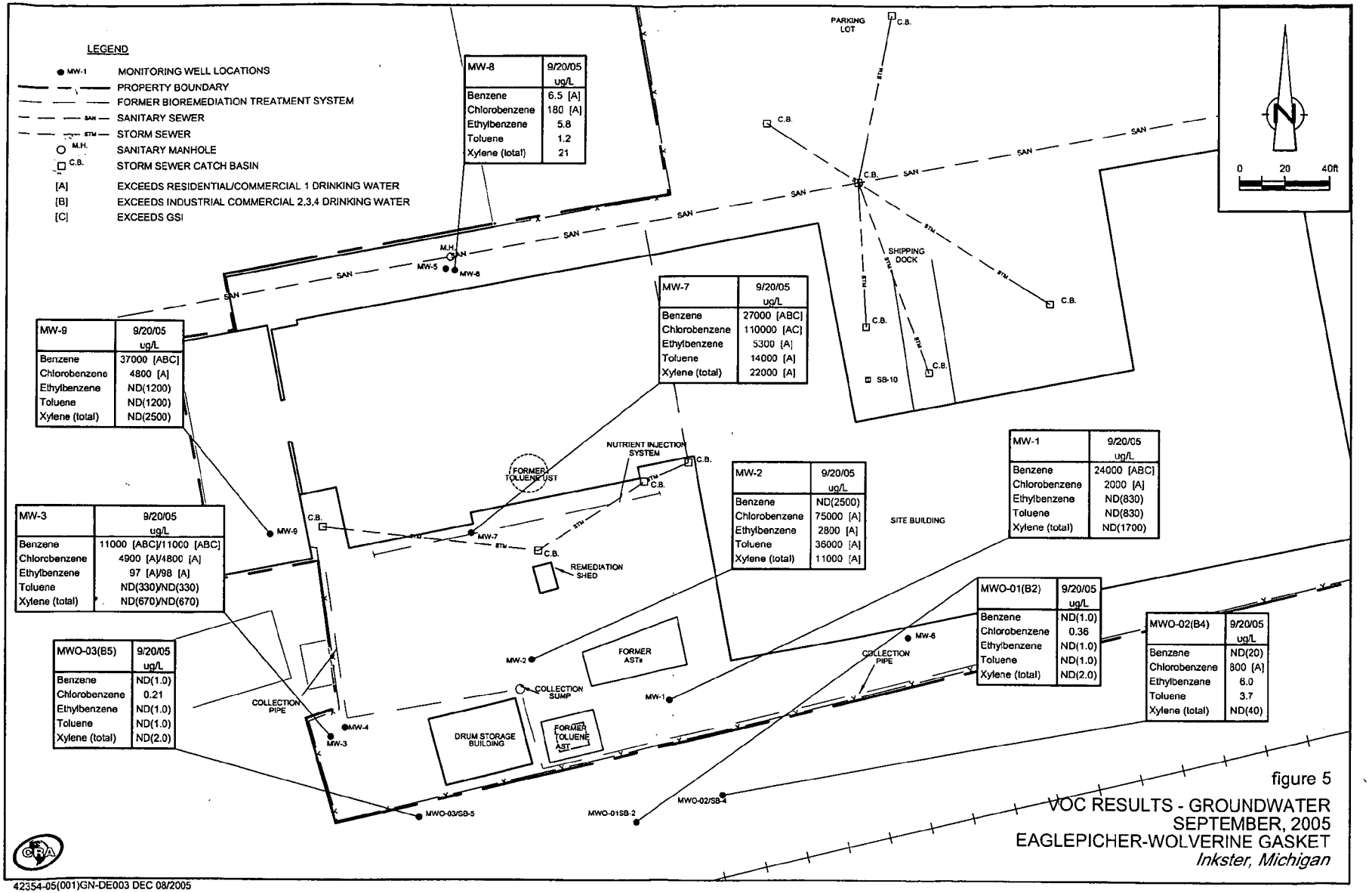

DWGS BEYOND
DWGS BEYOND
VACANT ATT
ST DK II ST. JOINT
A.S. OFFICES
OFFICES
No. 11
PASS
A.S. COATING MACHINE & STORAGE
No. 10
ST. ST. FR.
A.S. RUBBER
No. 9
PLATENING PRESSES
COATING LINE
No. 1
Flame Lig.
NEW YORK CEN. R. R.
12 in
12 in.
70 PSI
To 8 in
12 in. to JOHN DALY
Fence & Property Line
Conc Dike 4ft High
10,000 Gal Toluene
No. 3
1 Sto. C.B.
10,000 Fuel oil
R.R.
Conc Dike
1500 Gal Lactol
5,000 Gal Isobutyl Acetate
8,000 Gal MEK
No. 4
Cork
No. 11
160 x 72
(1960)
1 Sto. C.B.
No. 10
146 x 70
(1960)
No. 9
12 x 50
DOCK 21 x 160
Coater
1-A
(76 x 40)
ST DK I AS
OFFICE
No. 1
154 x 70
(1958)
No. 2
No. 5
Rf-St.St.Fr
(AS)
Punch & Plate Presses
2 in. NFS.
To Spr. Booth
5-B
No. 12
Stage Tools
Fence & Property Line
Wol. DWGS BEYOND
EAGLE-PICHER INDUSTRIES, INC.
"WOLVERINE FABRICATING DIVISION"
Inkster, Mich.
For Reg. Insp. of D.J. Dezsi
Dated 1-12-89
Scale: 1 in. = 80 ft.
FACTORY MUTUAL ENGINEERING DIVISION
Factory Mutual System
Ind. No. 58469-53
Tr. No. 880-5112

MI0013167

City of Inkster
Combined Sanitary Sewer System
Identification Map



MI0013168



MW-8	9/20/05 ug/L
Benzene	6.5 [A]
Chlorobenzene	180 [A]
Ethylbenzene	5.8
Toluene	1.2
Xylene (total)	21

MW-7	9/20/05 ug/L
Benzene	27000 [ABC]
Chlorobenzene	110000 [AC]
Ethylbenzene	5300 [A]
Toluene	14000 [A]
Xylene (total)	22000 [A]

MW-9	9/20/05 ug/L
Benzene	37000 [ABC]
Chlorobenzene	4800 [A]
Ethylbenzene	ND(1200)
Toluene	ND(1200)
Xylene (total)	ND(2500)

MW-2	9/20/05 ug/L
Benzene	ND(2500)
Chlorobenzene	75000 [A]
Ethylbenzene	2800 [A]
Toluene	36000 [A]
Xylene (total)	11000 [A]

MW-1	9/20/05 ug/L
Benzene	24000 [ABC]
Chlorobenzene	2000 [A]
Ethylbenzene	ND(830)
Toluene	ND(830)
Xylene (total)	ND(1700)

MW-3	9/20/05 ug/L
Benzene	11000 [ABC]/11000 [ABC]
Chlorobenzene	4900 [A]/4800 [A]
Ethylbenzene	97 [A]/98 [A]
Toluene	ND(330)/ND(330)
Xylene (total)	ND(670)/ND(670)

MWO-01(B2)	9/20/05 ug/L
Benzene	ND(1.0)
Chlorobenzene	0.36
Ethylbenzene	ND(1.0)
Toluene	ND(1.0)
Xylene (total)	ND(2.0)

MWO-02(B4)	9/20/05 ug/L
Benzene	ND(20)
Chlorobenzene	800 [A]
Ethylbenzene	6.0
Toluene	3.7
Xylene (total)	ND(40)

MWO-03(B5)	9/20/05 ug/L
Benzene	ND(1.0)
Chlorobenzene	0.21
Ethylbenzene	ND(1.0)
Toluene	ND(1.0)
Xylene (total)	ND(2.0)

figure 5
VOC RESULTS - GROUNDWATER
SEPTEMBER, 2005
EAGLEPICHER-WOLVERINE GASKET
Inkster, Michigan

42354-05(001)GN-DE003 DEC 08/2005

MI0013169

TABLE 4

GROUNDWATER ANALYTICAL RESULTS
SEPTEMBER 20, 2005
EAGLEPICHER-WOLVERINE GASKET
INKSTER, MICHIGAN

Michigan Act 451, Part 201 Groundwater: Residential and Industrial-Commercial Generic Cleanup Criteria (1)

Sample Location	Units	Residential & Commercial I Drinking Water	Residential & Commercial I Groundwater Volatilization to Indoor Air Inhalation	Groundwater Contact	Flammability and Explosivity Screening Levels	Acute Inhalation Screening Levels	MW-1	MW-2	MW-3	MW-3	MW-7	MW-8	MW-9	MWO-01(B2)	MWO-02(B4)	MWO-03(B5)
Sample Identification							GW-35298-092005-JY-050	GW-35298-092005-JY-043	GW-35298-092005-JY-044	GW-35298-092005-JY-045	GW-35298-092005-JY-046	GW-35298-092005-JY-049	GW-35298-092005-JY-047	GW-35298-092005-JY-051	GW-35298-092005-JY-052	GW-35298-092005-JY-053
Sample Date							9/20/2005	9/20/2005	9/20/2005	9/20/2005	9/20/2005	9/20/2005	9/20/2005	9/20/2005	9/20/2005	9/20/2005
Sample Type		a	b	c	d	e				Duplicate						
Target Compound List Volatile Organic Compounds																
1,1,1-Trichloroethane	μg/L	200	660000	1300000	ID	1300000	ND(830)	ND(2500)	ND(330)	ND(330)	ND(5000)	2.7 J	ND(1200)	ND(1.0)	ND(20)	ND(1.0)
1,1,2,2-Tetrachloroethane	μg/L	8.5	12000	4700	ID	ID	ND(830)	ND(2500)	ND(330)	ND(330)	ND(5000)	ND(5.7)	ND(1200)	ND(1.0)	ND(20)	ND(1.0)
1,1,2-Trichloroethane	μg/L	5	17000	21000		ID	ND(830)	ND(2500)	ND(330)	ND(330)	ND(5000)	ND(5.7)	ND(1200)	ND(1.0)	ND(20)	ND(1.0)
1,1-Dichloroethane	μg/L	880	1000000	2400000	380000	ID	ND(830)	ND(2500)	ND(330)	ND(330)	ND(5000)	21	ND(1200)	ND(1.0)	ND(20)	ND(1.0)
1,1-Dichloroethene	μg/L	7	200	11000	97000	140000	ND(830)	ND(2500)	ND(330)	ND(330)	ND(5000)	ND(5.7)	ND(1200)	ND(1.0)	ND(20)	ND(1.0)
1,2,4-Trichlorobenzene	μg/L	70	300000	19000		300000	ND(4200)	ND(12000)	ND(1700)	ND(1700)	ND(25000)	ND(29)	ND(6200)	ND(5.0)	ND(100)	ND(5.0)
1,2,4-Trimethylbenzene	μg/L	63	56000	5600	56000	ID	ND(830)	ND(2500)	ND(330)	ND(330)	ND(5000)	ND(5.7)	ND(1200)	ND(1.0)	ND(20)	ND(1.0)
1,2-Dibromo-3-chloropropane (DBCP)	μg/L	0.2	1200	390		ID	ND(830)	ND(2500)	ND(330)	ND(330)	ND(5000)	ND(5.7)	ND(1200)	ND(1.0)	ND(20)	ND(1.0)
1,2-Dibromoethane (Ethylene Dibromide)	μg/L	0.05	2400	25	ID	ID	ND(830)	ND(2500)	ND(330)	ND(330)	ND(5000)	ND(5.7)	ND(1200)	ND(1.0)	ND(20)	ND(1.0)
1,2-Dichlorobenzene	μg/L	600	160000	160000		160000	ND(830)	ND(2500)	ND(330)	ND(330)	ND(5000)	ND(5.7)	ND(1200)	ND(1.0)	ND(20)	ND(1.0)
1,2-Dichloroethane	μg/L	5	9600	19000	2500000	ID	ND(830)	ND(2500)	ND(330)	ND(330)	ND(5000)	ND(5.7)	ND(1200)	0.65 J	ND(20)	ND(1.0)
1,2-Dichloropropane	μg/L	5	16000	16000	550000	3800000	ND(830)	ND(2500)	ND(330)	ND(330)	ND(5000)	ND(5.7)	ND(1200)	ND(1.0)	ND(20)	ND(1.0)
1,3,5-Trimethylbenzene	μg/L	72	61000	61000	ID	ID	ND(830)	ND(2500)	ND(330)	ND(330)	ND(5000)	ND(5.7)	ND(1200)	ND(1.0)	ND(20)	ND(1.0)
1,3-Dichlorobenzene	μg/L	6.6	ID	2000	ID	ID	ND(830)	ND(2500)	ND(330)	ND(330)	ND(5000)	ND(5.7)	ND(1200)	ND(1.0)	ND(20)	ND(1.0)
1,4-Dichlorobenzene	μg/L	75	16000	6400		ID	ND(830)	ND(2500)	ND(330)	ND(330)	ND(5000)	1.5 J	ND(1200)	ND(1.0)	ND(20)	ND(1.0)
2-Butanone (Methyl Ethyl Ketone)	μg/L	13000	240000000	240000000	ID	240000000	ND(21000)	ND(62000)	ND(8300)	ND(8300)	ND(120000)	6.4 J	ND(31000)	ND(25)	ND(500)	ND(25)
2-Hexanone	μg/L	1000	4200000	5200000		ID	ND(42000)	ND(120000)	ND(17000)	ND(17000)	ND(250000)	ND(290)	ND(62000)	ND(50)	ND(1000)	ND(50)
4-Methyl-2-Pentanone (Methyl Isobutyl Ketone)	μg/L	1800	20000000	13000000	ID	20000000	ND(42000)	ND(120000)	ND(17000)	ND(17000)	ND(250000)	ND(290)	ND(62000)	ND(50)	ND(1000)	ND(50)
Acetone	μg/L	730	1000000000	31000000	15000000	1000000000	ND(21000)	ND(62000)	ND(8300)	ND(8300)	ND(120000)	170	ND(31000)	ND(25)	ND(500)	ND(25)
Benzene	μg/L	5	5600	11000	68000	67000	24000	ND(2500)	11000	11000	27000	6.5	37000	ND(1.0)	ND(20)	ND(1.0)
Bromodichloromethane	μg/L	80	4800	14000	ID	ID	ND(830)	ND(2500)	ND(330)	ND(330)	ND(5000)	ND(5.7)	ND(1200)	ND(1.0)	ND(20)	ND(1.0)
Bromoform	μg/L	80	470000	140000	ID	ID	ND(830)	ND(2500)	ND(330)	ND(330)	ND(5000)	ND(5.7)	ND(1300)	ND(1.0)	ND(20)	ND(1.0)
Bromomethane (Methyl Bromide)	μg/L	10	4000	70000	ID	ID	ND(830)	ND(2500)	ND(330)	ND(330)	ND(5000)	ND(5.7)	ND(1200)	ND(1.0)	ND(20)	ND(1.0)
Carbon disulfide	μg/L	800	150000	1200000	13000	ID	ND(4200)	ND(12000)	ND(1700)	ND(1700)	ND(25000)	ND(29)	ND(6200)	ND(5.0)	ND(100)	ND(5.0)
Carbon tetrachloride	μg/L	5	370	4600	ID	96000	ND(830)	ND(2500)	ND(330)	ND(330)	ND(5000)	ND(5.7)	ND(1200)	ND(1.0)	ND(20)	ND(1.0)
Chlorobenzene	μg/L	100	210000	86000	160000	ID	2000	75000	4900	4800	110000	180	4800	0.36 J	800	0.21 J
Chloroethane	μg/L	430	5700000	440000	110000	ID	ND(830)	ND(2500)	ND(330)	ND(330)	ND(5000)	12	ND(1200)	ND(1.0)	ND(20)	ND(1.0)
Chloroform (Trichloromethane)	μg/L	80	28000	150000	ID	ID	ND(830)	ND(2500)	ND(330)	ND(330)	ND(5000)	1.5 J	ND(1200)	ND(1.0)	ND(20)	ND(1.0)
methane (Methyl Chloride)	μg/L	260	8600	490000	36000	210000	ND(830)	ND(2500)	ND(330)	ND(330)	ND(5000)	ND(5.7)	ND(1200)	ND(1.0)	ND(20)	ND(1.0)
-Dichloroethene	μg/L	70	93000	200000	530000	ID	ND(830)	ND(2500)	ND(330)	ND(330)	ND(5000)	ND(5.7)	ND(1200)	ND(1.0)	ND(20)	ND(1.0)
Cyclohexane	μg/L						ND(830)	ND(2500)	ND(330)	ND(330)	ND(5000)	ND(5.7)	ND(1200)	ND(1.0)	ND(20)	ND(1.0)
Dibromochloromethane	μg/L	80	14000	18000	ID	ID	ND(830)	ND(2500)	ND(330)	ND(330)	ND(5000)	ND(5.7)	ND(1200)	ND(1.0)	ND(20)	ND(1.0)
Dichlorodifluoromethane (CFC-12)	μg/L	1700	220000	300000	ID	ID	ND(830)	ND(2500)	ND(330)	ND(330)	ND(5000)	ND(5.7)	ND(1200)	ND(1.0)	ND(20)	ND(1.0)
Ethylbenzene	μg/L	74	110000	170000	43000	170000	ND(830)	2800	97 J	98 J	5300	5.8	ND(1200)	ND(1.0)	6.0 J	ND(1.0)
Isopropylbenzene	μg/L	800	56000	5600	39000	ID	ND(4200)	ND(12000)	ND(1700)	ND(1700)	ND(25000)	ND(29)	ND(6200)	ND(5.0)	ND(100)	ND(5.0)
Methyl acetate	μg/L						ND(8300)	ND(25000)	ND(3300)	ND(3300)	ND(50000)	ND(57)	ND(12000)	ND(10)	ND(200)	ND(10)
Methyl cyclohexane	μg/L						ND(830)	ND(2500)	ND(330)	ND(330)	ND(5000)	ND(5.7)	ND(1200)	ND(1.0)	ND(20)	ND(1.0)
Methyl Tert Butyl Ether	μg/L	40	47000000	610000	ID	ID	ND(4200)	ND(12000)	ND(1700)	ND(1700)	ND(25000)	ND(29)	ND(6200)	ND(5.0)	ND(100)	ND(5.0)
Methylene chloride	μg/L	5	220000	220000	ID	ID	ND(4200)	ND(12000)	ND(1700)	ND(1700)	ND(25000)	ND(29)	ND(6200)	ND(5.0)	ND(100)	ND(5.0)
Styrene	μg/L	100	170000	9700	140000	310000	ND(830)	ND(2500)	ND(330)	ND(330)	ND(5000)	ND(5.7)	ND(1200)	ND(1.0)	ND(20)	ND(1.0)
Tetrachloroethene	μg/L	5	25000	12000	ID	200000	ND(830)	ND(2500)	ND(330)	ND(330)	ND(5000)	ND(5.7)	ND(1200)	ND(1.0)	ND(20)	ND(1.0)
Toluene	μg/L	790	530000	530000	61000	ID	ND(830)	36000	ND(330)	ND(330)	14000	1.2 J	ND(1200)	ND(1.0)	3.7 J	ND(1.0)
trans-1,2-Dichloroethene	μg/L	100	85000	220000	230000	ID	ND(830)	ND(2500)	ND(330)	ND(330)	ND(5000)	ND(5.7)	ND(1200)	ND(1.0)	ND(20)	ND(1.0)
Trichloroethene	μg/L	5	15000	2200	ID	1100000	ND(830)	ND(2500)	ND(330)	ND(330)	ND(5000)	ND(5.7)	ND(1200)	ND(1.0)	ND(20)	ND(1.0)
Trichlorofluoromethane (CFC-11)	μg/L	2600	1100000	1100000	ID	1100000	ND(830)	ND(2500)	ND(330)	ND(330)	ND(5000)	ND(5.7)	ND(1200)	ND(1.0)	ND(20)	ND(1.0)
Trifluorotrichloroethane (Freon 113)	μg/L	170000	170000	170000	ID	170000	ND(830)	ND(2500)	ND(330)	ND(330)	ND(5000)	ND(5.7)	ND(1200)	ND(1.0)	ND(20)	ND(1.0)
Vinyl chloride	μg/L	2	1100	1000	33000	ID	ND(830)	ND(2500)	ND(330)	ND(330)	ND(5000)	ND(5.7)	ND(1200)	ND(1.0)	ND(20)	ND(1.0)
Xylene (total)	μg/L	280	190000	190000	70000	190000	ND(1700)	11000	ND(670)	ND(670)	22000	21	ND(2500)	ND(2.0)	ND(40)	ND(2.0)
cis-1,3-Dichloropropene	μg/L						ND(830)	ND(2500)	ND(330)	ND(330)	ND(5000)	ND(5.7)	ND(1200)	ND(1.0)	ND(20)	ND(1.0)
trans-1,3-Dichloropropene	μg/L						ND(830)	ND(2500)	ND(330)	ND(330)	ND(5000)	ND(5.7)	ND(1200)	ND(1.0)	ND(20)	ND(1.0)
1,3-Dichloropropene (Total)	μg/L	8.5	3900	5500	130000	ID										

Notes:

ND ( ) - Not detected above the value in parenthesis.
Organics:
J - Laboratory qualified as an estimated value.
B - Laboratory qualifier: Method blank contamination. The associated method blank contains the target analyte at a reportable level.
(1) Cleanup criteria identified by MDEQ RRD Op Memo No. 1 dated 6/21/2005 pursuant to 1994 PA 451 as amended.
[100] Exceeds Part 201 Generic Criteria, referenced by column.

CRA 42354-4-T4D

TABLE 5

HISTORICAL ANALYTICAL DATA
EAGLEPICHER - WOLVERINE GASKET
INKSTER, MICHIGAN

Michigan Act 451, Part 201 Groundwater Residential and Industrial-Commercial Generic Cleanup Criteria. (1)

Sample Location / Sample Identification / Sample Date / Sample Type	Units	Residential & Commercial I Drinking Water (a)	Residential & Commercial I Groundwater Volatilization to Indoor Air Inhalation (b)	Groundwater Contact (c)	Flammability and Explosivity Screening Levels (d)	Acute Inhalation Screening Levels (e)
Target Compound List Volatile Organic Compounds						
1,1,1-Trichloroethane	ug/L	200	660000	1300000	ID	1300000
1,1,2,2-Tetrachloroethane	ug/L	8.5	12000	4700	ID	ID
1,1,2-Trichloroethane	ug/L	5	17000	21000		ID
1,1-Dichloroethane	ug/L	880	1000000	2400000	380000	ID
1,1-Dichloroethene	ug/L	7	200	11000	97000	140000
1,2,4-Trichlorobenzene	ug/L	70	300000	19000		300000
1,2,4-Trimethylbenzene	ug/L	63	56000	56000	56000	ID
1,2-Dibromo-3-chloropropane (DBCP)	ug/L	0.2	1300	390		ID
1,2-Dibromoethane (Ethylene Dibromide)	ug/L	0.05	2400	23	ID	ID
1,2-Dichlorobenzene	ug/L	600	160000	160000		160000
1,2-Dichloroethane	ug/L	5	9600	19000	2500000	ID
1,2-Dichloropropane	ug/L	5	16000	16000	550000	2500000
1,3,5-Trimethylbenzene	ug/L	72	61000	61000	ID	ID
1,3-Dichlorobenzene	ug/L	6.6	ID	2200	ID	ID
1,4-Dichlorobenzene	ug/L	75	16000	6400		ID
2-Butanone (Methyl Ethyl Ketone)	ug/L	13000	240000000	240000000	ID	240000000
2-Hexanone	ug/L	1000	1200000	5200000		ID
4-Methyl-2-Pentanone (Methyl Isobutyl Ketone)	ug/L	1800	20000000	13000000	ID	20000000
Acetone	ug/L	730	1000000000	31000000	15000000	1000000000
Benzene	ug/L	5	5600	11000	68000	67000
Bromodichloromethane	ug/L	80	4800	14000	ID	ID
Bromoform	ug/L	80	470000	140000	ID	ID
Bromomethane (Methyl Bromide)	ug/L	10	4000	70000	ID	ID
Carbon disulfide	ug/L	800	250000	1200000	13000	ID
Carbon tetrachloride	ug/L	5	370	4600	ID	96000
Chlorobenzene	ug/L	100	210000	86000	160000	ID
Chloroethane	ug/L	430	5700000	440000	110000	ID
Chloroform (Trichloromethane)	ug/L	80	28000	150000	ID	ID
Chloromethane (Methyl Chloride)	ug/L	260	8600	490000	36000	210000
cis-1,2-Dichloroethene	ug/L	70	93000	200000	530000	ID
Cyclohexane	ug/L					
Dibromochloromethane	ug/L	80	14000	18000	ID	ID
Dichlorodifluoromethane (CFC-12)	ug/L	1700	120000	300000	ID	ID
...benzene	ug/L	74	110000	170000	43000	170000
...pylbenzene	ug/L	800	56000	56000	29000	ID
...nyl acetate	ug/L					
Methyl cyclohexane	ug/L					
Methyl Tert Butyl Ether	ug/L	40	47000000	610000	ID	ID
Methylene chloride	ug/L	5	220000	220000	ID	ID
Styrene	ug/L	100	170000	9700	140000	310000
Tetrachloroethene	ug/L	5	25000	12000	ID	200000
Toluene	ug/L	790	530000	530000	61000	ID
trans-1,2-Dichloroethene	ug/L	100	85000	220000	230000	ID
Trichloroethene	ug/L	5	15000	22000	ID	1100000
Trichlorofluoromethane (CFC-11)	ug/L	3600	1100000	1100000	ID	1100000
Trifluorotrichloroethane (Freon 113)	ug/L	170000	170000	170000	ID	170000
Vinyl chloride	ug/L	2	1100	1000	33000	ID
Xylene (total)	ug/L	280	190000	190000	70000	190000
cis-1,3-Dichloropropene	ug/L					
trans-1,3-Dichloropropene	ug/L					
1,3-Dichloropropene (Total)	ug/L	8.5	3900	5500	130000	ID
Metals						
Iron	mg/L	0.3	NLV	58000	ID	ID
Iron (Dissolved)	mg/L	0.3	NLV	58000	ID	ID
Manganese	mg/L	0.05	NLV	9100	ID	ID
Manganese (Dissolved)	mg/L	0.05	NLV	9100	ID	ID
General Chemistry						
Ammonia	mg/L	10	3200	ID	ID	3500
Nitrate (as N)	mg/L	10	NLV	310000	ID	ID
Nitrite (as N)	mg/L	1		ID	ID	ID
Orthophosphate	mg/L					
Sulfate	mg/L	250	NLV	ID	ID	ID
Sulfide	mg/L					
Total Organic Carbon (TOC)	mg/L					

Sample Location	MW-1	MW-1	MW-1	MW-1	MW-1	MW-1	MW-1	MW-1
Sample Identification	MW-1	MW-1	MW-1	MW-1	MW-1	MW-1	MW-1	MW-1
Sample Date	5/1/1992	12/1/1992	5/1/1993	12/1/1993	8/1/1994	11/1/1994	4/1/1995	11/1/1995
1,1,1-Trichloroethane	-	-	-	-	-	-	-	-
1,1,2,2-Tetrachloroethane	-	-	-	-	-	-	-	-
1,1,2-Trichloroethane	-	-	-	-	-	-	-	-
1,1-Dichloroethane	-	-	-	-	-	-	-	-
1,1-Dichloroethene	-	-	-	-	-	-	-	-
1,2,4-Trichlorobenzene	-	-	-	-	-	-	-	-
1,2,4-Trimethylbenzene	-	-	-	-	-	-	-	-
1,2-Dibromo-3-chloropropane (DBCP)	-	-	-	-	-	-	-	-
1,2-Dibromoethane (Ethylene Dibromide)	-	-	-	-	-	-	-	-
1,2-Dichlorobenzene	-	-	-	-	-	-	-	-
1,2-Dichloroethane	-	-	-	-	-	-	-	-
1,2-Dichloropropane	-	-	-	-	-	-	-	-
1,3,5-Trimethylbenzene	-	-	-	-	-	-	-	-
1,3-Dichlorobenzene	-	-	-	-	-	-	-	-
1,4-Dichlorobenzene	-	-	-	-	-	-	-	-
2-Butanone (Methyl Ethyl Ketone)	-	-	-	-	-	-	-	-
2-Hexanone	-	-	-	-	-	-	-	-
4-Methyl-2-Pentanone (Methyl Isobutyl Ketone)	-	-	-	-	-	-	-	-
Acetone	-	-	-	-	-	-	-	-
Benzene	-	-	-	-	-	-	-	-
Bromodichloromethane	-	-	-	-	-	-	-	-
Bromoform	-	-	-	-	-	-	-	-
Bromomethane (Methyl Bromide)	-	-	-	-	-	-	-	-
Carbon disulfide	-	-	-	-	-	-	-	-
Carbon tetrachloride	-	-	-	-	-	-	-	-
Chlorobenzene	-	-	-	-	-	-	-	-
Chloroethane	-	-	-	-	-	-	-	-
Chloroform (Trichloromethane)	-	-	-	-	-	-	-	-
Chloromethane (Methyl Chloride)	-	-	-	-	-	-	-	-
cis-1,2-Dichloroethene	-	-	-	-	-	-	-	-
Cyclohexane	-	-	-	-	-	-	-	-
Dibromochloromethane	-	-	-	-	-	-	-	-
Dichlorodifluoromethane (CFC-12)	-	-	-	-	-	-	-	-
...benzene	-	-	-	-	-	-	-	-
...pylbenzene	-	-	-	-	-	-	-	-
...nyl acetate	-	-	-	-	-	-	-	-
Methyl cyclohexane	-	-	-	-	-	-	-	-
Methyl Tert Butyl Ether	-	-	-	-	-	-	-	-
Methylene chloride	-	-	-	-	-	-	-	-
Styrene	-	-	-	-	-	-	-	-
Tetrachloroethene	-	-	-	-	-	-	-	-
Toluene	273000 JB	110000 JB	71000 JB	6600 J	73000 JB	34000 J	41000 J	16000 J
trans-1,2-Dichloroethene	-	-	-	-	-	-	-	-
Trichloroethene	-	-	-	-	-	-	-	-
Trichlorofluoromethane (CFC-11)	-	-	-	-	-	-	-	-
Trifluorotrichloroethane (Freon 113)	-	-	-	-	-	-	-	-
Vinyl chloride	-	-	-	-	-	-	-	-
Xylene (total)	6600 J	8700 J	8700 J	1900 J	4700 J	2100 J	5600 J	3200 J
cis-1,3-Dichloropropene	-	-	-	-	-	-	-	-
trans-1,3-Dichloropropene	-	-	-	-	-	-	-	-
1,3-Dichloropropene (Total)								
Iron	-	-	-	-	-	-	-	-
Iron (Dissolved)	-	-	-	-	-	-	-	-
Manganese	-	-	-	-	-	-	-	-
Manganese (Dissolved)	-	-	-	-	-	-	-	-
Ammonia	-	-	-	-	-	-	-	-
Nitrate (as N)	-	-	-	-	-	-	-	-
Nitrite (as N)	-	-	-	-	-	-	-	-
Orthophosphate	-	-	-	-	-	-	-	-
Sulfate	-	-	-	-	-	-	-	-
Sulfide	-	-	-	-	-	-	-	-
Total Organic Carbon (TOC)	-	-	-	-	-	-	-	-

Sample Location	MW-1	MW-1	MW-1	MW-1	MW-1	MW-1	MW-1	MW-1
Sample Identification	MW-1	MW-1	MW-1	MW-1	MW-1	MW-1	GW-35298-061704-BF-029	GW-35298-092005-JY-050
Sample Date	5/11/1999	9/1/1999	7/1/2000	11/14/2000	5/22/2001	11/1/2002	6/15/2004	9/20/2005
1,1,1-Trichloroethane	-	-	-	-	-	-	ND(710)	ND(830)
1,1,2,2-Tetrachloroethane	-	-	-	-	-	-	ND(710)	ND(830)
1,1,2-Trichloroethane	-	-	-	-	-	-	ND(710)	ND(830)
1,1-Dichloroethane	-	-	-	-	-	-	ND(710)	ND(830)
1,1-Dichloroethene	-	-	-	-	-	-	ND(710)	ND(830)
1,2,4-Trichlorobenzene	-	-	-	-	-	-	ND(3600)	ND(4200)
1,2,4-Trimethylbenzene	1.9	-	-	-	-	-	ND(710)	ND(830)
1,2-Dibromo-3-chloropropane (DBCP)	-	-	-	-	-	-	ND(710)	ND(830)
1,2-Dibromoethane (Ethylene Dibromide)	-	-	-	-	-	-	ND(710)	ND(830)
1,2-Dichlorobenzene	-	-	-	-	-	-	ND(710)	ND(830)
1,2-Dichloroethane	-	-	-	-	-	-	ND(710)	ND(830)
1,2-Dichloropropane	-	-	-	-	-	-	ND(710)	ND(830)
1,3,5-Trimethylbenzene	-	-	-	-	-	-	-	ND(830)
1,3-Dichlorobenzene	-	-	-	-	-	-	ND(710)	ND(830)
1,4-Dichlorobenzene	-	-	-	-	-	-	ND(710)	ND(830)
2-Butanone (Methyl Ethyl Ketone)	-	-	-	-	-	-	ND(18000)	ND(21000)
2-Hexanone	-	-	-	-	-	-	ND(36000)	ND(42000)
4-Methyl-2-Pentanone (Methyl Isobutyl Ketone)	-	-	-	-	-	-	ND(36000)	ND(42000)
Acetone	-	-	-	-	-	-	ND(18000)	ND(21000)
Benzene	3300 J	-	-	13000 JB	580 J	6200 JB	20000 JB	24000 JB
Bromodichloromethane	-	-	-	-	-	-	ND(710)	ND(830)
Bromoform	-	-	-	-	-	-	ND(710)	ND(830)
Bromomethane (Methyl Bromide)	-	-	-	-	-	-	ND(710)	ND(830)
Carbon disulfide	-	-	-	-	-	-	ND(3600)	ND(4200)
Carbon tetrachloride	-	-	-	-	-	-	ND(710)	ND(830)
Chlorobenzene	1300 J	-	-	-	-	-	1400 J	2000 J
Chloroethane	-	-	-	-	-	-	ND(710)	ND(830)
Chloroform (Trichloromethane)	-	-	-	-	-	-	ND(710)	ND(830)
Chloromethane (Methyl Chloride)	-	-	-	-	-	-	ND(710)	ND(830)
cis-1,2-Dichloroethene	-	-	-	-	-	-	ND(710)	ND(830)
Cyclohexane	-	-	-	-	-	-	ND(710)	ND(830)
Dibromochloromethane	-	-	-	-	-	-	ND(710)	ND(830)
Dichlorodifluoromethane (CFC-12)	-	-	-	-	-	-	ND(710)	ND(830)
...benzene	110 J	-	-	130 J	210 J	62	ND(710)	ND(830)
...pylbenzene	ND(1.0)	-	-	-	-	-	ND(3600)	ND(4200)
...nyl acetate	-	-	-	-	-	-	ND(7100)	ND(8300)
Methyl cyclohexane	-	-	-	-	-	-	ND(710)	ND(830)
Methyl Tert Butyl Ether	-	-	-	-	-	-	ND(3600)	ND(4200)
Methylene chloride	-	-	-	-	-	-	ND(3600)	ND(4200)
Styrene	-	-	-	-	-	-	ND(710)	ND(830)
Tetrachloroethene	-	-	-	-	-	-	ND(710)	ND(830)
Toluene	720	160	12000 J	1300 J	460	63	ND(710)	ND(830)
trans-1,2-Dichloroethene	-	-	-	-	-	-	ND(710)	ND(830)
Trichloroethene	-	-	-	-	-	-	ND(710)	ND(830)
Trichlorofluoromethane (CFC-11)	-	-	-	-	-	-	ND(710)	ND(830)
Trifluorotrichloroethane (Freon 113)	-	-	-	-	-	-	ND(710)	ND(830)
Vinyl chloride	-	-	-	-	-	-	ND(710)	ND(830)
Xylene (total)	220	460 J	3100 J	350 J	840 J	130	ND(1400)	ND(1700)
cis-1,3-Dichloropropene	-	-	-	-	-	-	ND(710)	ND(830)
trans-1,3-Dichloropropene	-	-	-	-	-	-	ND(710)	ND(830)
1,3-Dichloropropene (Total)								
Iron	-	-	-	-	-	-	16.2 J	-
Iron (Dissolved)	-	-	-	-	-	-	16.9 J	-
Manganese	-	-	-	-	-	-	0.52 J	-
Manganese (Dissolved)	-	-	-	-	-	-	0.54 J	-
Ammonia	-	-	-	-	-	-	0.9	-
Nitrate (as N)	-	-	-	-	-	-	ND(0.10)	-
Nitrite (as N)	-	-	-	-	-	-	ND(0.50)	-
Orthophosphate	-	-	-	-	-	-	ND(0.50)	-
Sulfate	-	-	-	-	-	-	ND(1.0)	-
Sulfide	-	-	-	-	-	-	ND(1.0)	-
Total Organic Carbon (TOC)	-	-	-	-	-	-	8	-

Sample Location	MW-2	MW-2	MW-2	MW-2	MW-2	MW-2
Sample Identification	MW-2	MW-2	MW-2	MW-2	MW-2	MW-2
Sample Date	5/1/1992	12/1/1992	5/1/1993	12/1/1993	8/1/1994	11/1/1994
1,1,1-Trichloroethane	-	-	-	-	-	-
1,1,2,2-Tetrachloroethane	-	-	-	-	-	-
1,1,2-Trichloroethane	-	-	-	-	-	-
1,1-Dichloroethane	-	-	-	-	-	-
1,1-Dichloroethene	-	-	-	-	-	-
1,2,4-Trichlorobenzene	-	-	-	-	-	-
1,2,4-Trimethylbenzene	-	-	-	-	-	-
1,2-Dibromo-3-chloropropane (DBCP)	-	-	-	-	-	-
1,2-Dibromoethane (Ethylene Dibromide)	-	-	-	-	-	-
1,2-Dichlorobenzene	-	-	-	-	-	-
1,2-Dichloroethane	-	-	-	-	-	-
1,2-Dichloropropane	-	-	-	-	-	-
1,3,5-Trimethylbenzene	-	-	-	-	-	-
1,3-Dichlorobenzene	-	-	-	-	-	-
1,4-Dichlorobenzene	-	-	-	-	-	-
2-Butanone (Methyl Ethyl Ketone)	-	-	-	-	-	-
2-Hexanone	-	-	-	-	-	-
4-Methyl-2-Pentanone (Methyl Isobutyl Ketone)	-	-	-	-	-	-
Acetone	-	-	-	-	-	-
Benzene	-	-	-	-	-	-
Bromodichloromethane	-	-	-	-	-	-
Bromoform	-	-	-	-	-	-
Bromomethane (Methyl Bromide)	-	-	-	-	-	-
Carbon disulfide	-	-	-	-	-	-
Carbon tetrachloride	-	-	-	-	-	-
Chlorobenzene	-	-	-	-	-	-
Chloroethane	-	-	-	-	-	-
Chloroform (Trichloromethane)	-	-	-	-	-	-
Chloromethane (Methyl Chloride)	-	-	-	-	-	-
cis-1,2-Dichloroethene	-	-	-	-	-	-
Cyclohexane	-	-	-	-	-	-
Dibromochloromethane	-	-	-	-	-	-
Dichlorodifluoromethane (CFC-12)	-	-	-	-	-	-
...benzene	-	-	-	-	-	-
...pylbenzene	-	-	-	-	-	-
...nyl acetate	-	-	-	-	-	-
Methyl cyclohexane	-	-	-	-	-	-
Methyl Tert Butyl Ether	-	-	-	-	-	-
Methylene chloride	-	-	-	-	-	-
Styrene	-	-	-	-	-	-
Tetrachloroethene	-	-	-	-	-	-
Toluene	98000 JB	390000 JB	200000 JB	1300 J	230000 JB	110000 JB
trans-1,2-Dichloroethene	-	-	-	-	-	-
Trichloroethene	-	-	-	-	-	-
Trichlorofluoromethane (CFC-11)	-	-	-	-	-	-
Trifluorotrichloroethane (Freon 113)	-	-	-	-	-	-
Vinyl chloride	-	-	-	-	-	-
Xylene (total)	ND()	12000 J	14000 J	400 J	ND()	3900 J
cis-1,3-Dichloropropene	-	-	-	-	-	-
trans-1,3-Dichloropropene	-	-	-	-	-	-
1,3-Dichloropropene (Total)						
Iron	-	-	-	-	-	-
Iron (Dissolved)	-	-	-	-	-	-
Manganese	-	-	-	-	-	-
Manganese (Dissolved)	-	-	-	-	-	-
Ammonia	-	-	-	-	-	-
Nitrate (as N)	-	-	-	-	-	-
Nitrite (as N)	-	-	-	-	-	-
Orthophosphate	-	-	-	-	-	-
Sulfate	-	-	-	-	-	-
Sulfide	-	-	-	-	-	-
Total Organic Carbon (TOC)	-	-	-	-	-	-

Notes:

ND( ) - Not detected above the value in parenthesis.

Organics:

J - Laboratory qualified as an estimated value.

B - Laboratory qualifier: Method blank contamination. The associated method blank contains the target analyte at a reportable level.

(1) Cleanup criteria identified by MDEQ RRD Op Memo No. 1 dated 6/21/2005 pursuant to 1994 PA 451 as amended.

[1000^a] Exceeds Part 201 Generic Criteria, referenced by column.

CRA 13794-1-T5D

MI0013171

TABLE 5

HISTORICAL ANALYTICAL DATA
EAGLEPICHER - WOLVERINE CASKET
INKSTER, MICHIGAN

Sample Location	Units	MW-2	MW-2	MW-2	MW-2	MW-2	MW-2	MW-2	MW-2	MW-2	MW-2
Sample Identification		MW-2	MW-2	MW-2	MW-2	MW-2	MW-2	MW-2	MW-2	MW-2	MW-2
Sample Date		4/1/1995	11/1/1995	5/11/1999	9/1/1999	2/1/2000	7/1/2000	11/14/2000	5/22/2001	11/14/2002	9/27/2002
Sample Type											
Target Compound List Volatile Organic Compounds											
1,1,1-Trichloroethane	ug/L	-	-	-	-	-	-	-	-	-	-
1,1,2,2-Tetrachloroethane	ug/L	-	-	-	-	-	-	-	-	-	-
1,1,2-Trichloroethane	ug/L	-	-	-	-	-	-	-	-	-	-
1,1-Dichloroethane	ug/L	-	-	-	-	-	-	-	-	-	-
1,1-Dichloroethene	ug/L	-	-	-	-	-	-	-	-	-	-
1,2,4-Trichlorobenzene	ug/L	-	-	-	-	-	-	-	-	-	-
1,2,4-Trimethylbenzene	ug/L	-	-	ND(100)	-	-	-	-	-	-	-
1,2-Dibromo-3-chloropropane (DBCP)	ug/L	-	-	-	-	-	-	-	-	-	-
1,2-Dibromoethane (Ethylene Dibromide)	ug/L	-	-	-	-	-	-	-	-	-	-
1,2-Dichlorobenzene	ug/L	-	-	-	-	-	-	-	-	-	-
1,2-Dichloroethane	ug/L	-	-	-	-	-	-	-	-	-	-
1,2-Dichloropropane	ug/L	-	-	-	-	-	-	-	-	-	-
1,3,5-Trimethylbenzene	ug/L	-	-	-	-	-	-	-	-	-	-
1,3-Dichlorobenzene	ug/L	-	-	-	-	-	-	-	-	-	-
1,4-Dichlorobenzene	ug/L	-	-	-	-	-	-	-	-	-	-
2-Butanone (Methyl Ethyl Ketone)	ug/L	-	-	-	-	-	-	-	-	-	-
2-Hexanone	ug/L	-	-	-	-	-	-	-	-	-	-
4-Methyl-2-Pentanone (Methyl Isobutyl Ketone)	ug/L	-	-	-	-	-	-	-	-	-	-
Acetone	ug/L	-	-	-	-	-	-	-	-	-	-
Benzene	ug/L	-	-	270J	-	-	-	110J	320J	ND(1.0)	78J
Bromodichloromethane	ug/L	-	-	-	-	-	-	-	-	-	-
Bromoform	ug/L	-	-	-	-	-	-	-	-	-	-
Bromomethane (Methyl Bromide)	ug/L	-	-	-	-	-	-	-	-	-	-
Carbon disulfide	ug/L	-	-	-	-	-	-	-	-	-	-
Carbon tetrachloride	ug/L	-	-	-	-	-	-	-	-	-	-
Chlorobenzene	ug/L	-	-	56000J	-	-	-	-	-	-	-
Chloroethane	ug/L	-	-	-	-	-	-	-	-	-	-
Chloroform (Trichloromethane)	ug/L	-	-	-	-	-	-	-	-	-	-
Chloromethane (Methyl Chloride)	ug/L	-	-	-	-	-	-	-	-	-	-
cis-1,2-Dichloroethene	ug/L	-	-	-	-	-	-	-	-	-	-
Cyclohexane	ug/L	-	-	-	-	-	-	-	-	-	-
Dibromochloromethane	ug/L	-	-	-	-	-	-	-	-	-	-
Dichlorodifluoromethane (CFC-12)	ug/L	-	-	-	-	-	-	-	-	-	-
Ethylbenzene	ug/L	-	-	3400J	-	-	-	720J	3400J	1200J	1400J
Isopropylbenzene	ug/L	-	-	ND(100)	-	-	-	-	-	-	-
Methyl acetate	ug/L	-	-	-	-	-	-	-	-	-	-
Methyl cyclohexane	ug/L	-	-	-	-	-	-	-	-	-	-
Methyl Tert Butyl Ether	ug/L	-	-	-	-	-	-	-	-	-	-
Methylene chloride	ug/L	-	-	-	-	-	-	-	-	-	-
Styrene	ug/L	-	-	-	-	-	-	-	-	-	-
Tetrachloroethene	ug/L	-	-	-	-	-	-	-	-	-	-
Toluene	ug/L	61000J	190000JB	120000JB	5500J	140000JB	120000JB	69000JB	140000JB	32000J	100000JB
trans-1,2-Dichloroethene	ug/L	-	-	-	-	-	-	-	-	-	-
Trichloroethene	ug/L	-	-	-	-	-	-	-	-	-	-
Trichlorofluoromethane (CFC-11)	ug/L	-	-	-	-	-	-	-	-	-	-
Trifluorotrichloroethane (Freon 113)	ug/L	-	-	-	-	-	-	-	-	-	-
Vinyl chloride	ug/L	-	-	-	-	-	-	-	-	-	-
Xylene (total)	ug/L	6100J	7000J	14000J	29000J	20000J	13000J	3300J	17000J	5500J	21000J
cis-1,3-Dichloropropene	ug/L	-	-	-	-	-	-	-	-	-	-
trans-1,3-Dichloropropene	ug/L	-	-	-	-	-	-	-	-	-	-
1,3-Dichloropropene (Total)	ug/L										
Metals											
Iron	mg/L	-	-	-	-	-	-	-	-	-	-
Iron (Dissolved)	mg/L	-	-	-	-	-	-	-	-	-	-
Manganese	mg/L	-	-	-	-	-	-	-	-	-	-
Manganese (Dissolved)	mg/L	-	-	-	-	-	-	-	-	-	-
General Chemistry											
Ammonia	mg/L	-	-	-	-	-	-	-	-	-	-
Nitrate (as N)	mg/L	-	-	-	-	-	-	-	-	-	-
Nitrite (as N)	mg/L	-	-	-	-	-	-	-	-	-	-
Orthophosphate	mg/L	-	-	-	-	-	-	-	-	-	-
Sulfate	mg/L	-	-	-	-	-	-	-	-	-	-
Sulfide	mg/L	-	-	-	-	-	-	-	-	-	-
Total Organic Carbon (TOC)	mg/L	-	-	-	-	-	-	-	-	-	-

Sample Location	MW-2	MW-2	MW-2	MW-3
Sample Identification	GW-35298-061704-BF-032	GW-35298-021605-BF-033	GW-35298-092005-JY-045	GW-35298-061704-BF-025
Sample Date	6/18/2004	2/16/2005	9/20/2005	6/17/2004
Target Compound List Volatile Organic Compounds				
1,1,1-Trichloroethane	ND(250)	ND(110)	ND(2500)	ND(420)
1,1,2,2-Tetrachloroethane	ND(250)	ND(110)	ND(2500)	ND(420)
1,1,2-Trichloroethane	ND(250)	ND(110)	ND(2500)	ND(420)
1,1-Dichloroethane	ND(250)	ND(110)	ND(2500)	ND(420)
1,1-Dichloroethene	ND(250)	ND(110)	ND(2500)	ND(420)
1,2,4-Trichlorobenzene	ND(1200)	ND(560)	ND(12000)	ND(2100)
1,2,4-Trimethylbenzene	ND(250)	-	ND(2500)	ND(420)
1,2-Dibromo-3-chloropropane (DBCP)	ND(250)	ND(110)	ND(1500)	ND(420)
1,2-Dibromoethane (Ethylene Dibromide)	ND(250)	ND(110)	ND(2500)	ND(420)
1,2-Dichlorobenzene	ND(250)	ND(110)	ND(2500)	ND(420)
1,2-Dichloroethane	ND(250)	ND(110)	ND(2500)	ND(420)
1,2-Dichloropropane	ND(250)	ND(110)	ND(2500)	ND(420)
1,3,5-Trimethylbenzene	-	-	ND(2500)	-
1,3-Dichlorobenzene	ND(250)	ND(110)	ND(2500)	ND(420)
1,4-Dichlorobenzene	ND(250)	ND(110)	ND(2500)	ND(420)
2-Butanone (Methyl Ethyl Ketone)	ND(6200)	ND(2800)	ND(62000)	ND(10000)
2-Hexanone	ND(12000)	ND(5600)	ND(120000)	ND(21000)
4-Methyl-2-Pentanone (Methyl Isobutyl Ketone)	ND(12000)	ND(5600)	ND(120000)	ND(21000)
Acetone	ND(6200)	130 J	ND(62000)	ND(10000)
Benzene	ND(250)	ND(110)	ND(2500)	8700J
Bromodichloromethane	ND(250)	ND(110)	ND(2500)	ND(420)
Bromoform	ND(250)	ND(110)	ND(2500)	ND(420)
Bromomethane (Methyl Bromide)	ND(250)	ND(110)	ND(2500)	ND(420)
Carbon disulfide	ND(1200)	ND(560)	ND(12000)	ND(2100)
Carbon tetrachloride	ND(250)	ND(110)	ND(2500)	ND(420)
Chlorobenzene	8500J	3200J	75000J	14000J
Chloroethane	ND(250)	ND(110)	ND(2500)	ND(420)
Chloroform (Trichloromethane)	ND(250)	ND(110)	ND(2500)	ND(420)
Chloromethane (Methyl Chloride)	ND(250)	ND(110)	ND(2500)	ND(420)
cis-1,2-Dichloroethene	ND(250)	ND(110)	ND(2500)	ND(420)
Cyclohexane	ND(250)	ND(110)	ND(2500)	ND(420)
Dibromochloromethane	ND(250)	ND(110)	ND(2500)	ND(420)
Dichlorodifluoromethane (CFC-12)	ND(250)	ND(110)	ND(2500)	ND(420)
Ethylbenzene	370J	160J	3800J	620J
Isopropylbenzene	ND(1200)	ND(560)	ND(12000)	ND(2100)
Methyl acetate	ND(2500)	ND(1100)	ND(25000)	ND(4200)
Methyl cyclohexane	ND(250)	ND(110)	ND(2500)	ND(420)
Methyl Tert Butyl Ether	ND(1200)	ND(560)	ND(12000)	ND(2100)
Methylene chloride	ND(1200)	ND(560)	ND(12000)	ND(2100)
Styrene	ND(250)	ND(110)	ND(2500)	ND(420)
Tetrachloroethene	ND(250)	ND(110)	ND(2500)	ND(420)
Toluene	7500J	610	36000J	ND(420)
trans-1,2-Dichloroethene	ND(250)	ND(110)	ND(2500)	ND(420)
Trichloroethene	ND(250)	ND(110)	ND(2500)	ND(420)
Trichlorofluoromethane (CFC-11)	ND(250)	ND(110)	ND(2500)	ND(420)
Trifluorotrichloroethane (Freon 113)	ND(250)	ND(110)	ND(2500)	ND(420)
Vinyl chloride	ND(250)	ND(110)	ND(2500)	ND(420)
Xylene (total)	1400J	480J	11000J	1400J
cis-1,3-Dichloropropene	ND(250)	ND(110)	ND(2500)	ND(420)
trans-1,3-Dichloropropene	ND(250)	ND(110)	ND(2500)	ND(420)
1,3-Dichloropropene (Total)				
Metals				
Iron	7.8J	-	-	3.3J
Iron (Dissolved)	8.1J	-	-	3.2J
Manganese	0.59J	-	-	1.3J
Manganese (Dissolved)	0.65J	-	-	1.2J
General Chemistry				
Ammonia	0.5	-	-	ND(0.2)
Nitrate (as N)	ND(0.10)	-	-	ND(0.10)
Nitrite (as N)	ND(0.10)	-	-	ND(0.10)
Orthophosphate	ND(0.50)	-	-	ND(0.50)
Sulfate	68.5	-	-	45.3
Sulfide	ND(1.0)	-	-	ND(1.0)
Total Organic Carbon (TOC)	14	-	-	10

Sample Location	MW-3	MW-3	MW-3	MW-3	MW-3	MW-3	MW-3	MW-3	MW-3	MW-3	MW-3	MW-3	MW-3	MW-3	MW-3	MW-3
Sample Identification	MW-3	MW-3	MW-3	MW-3	MW-3	MW-3	MW-3	MW-3	MW-3	MW-3	MW-3	MW-3	MW-3	MW-3	MW-3	MW-3
Sample Date	5/1/1992	12/1/1992	5/1/1993	12/1/1993	6/1/1994	11/1/1994	4/1/1995	11/1/1995	5/11/1999	9/1/1999	2/1/2000	7/1/2000	11/14/2000	5/22/2001	11/14/2002	9/27/2002
Target Compound List Volatile Organic Compounds																
1,1,1-Trichloroethane	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
1,1,2,2-Tetrachloroethane	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
1,1,2-Trichloroethane	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
1,1-Dichloroethane	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
1,1-Dichloroethene	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
1,2,4-Trichlorobenzene	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
1,2,4-Trimethylbenzene	-	-	-	-	-	-	-	-	ND(1.0)	-	-	-	-	-	-	-
1,2-Dibromo-3-chloropropane (DBCP)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
1,2-Dibromoethane (Ethylene Dibromide)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
1,2-Dichlorobenzene	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
1,2-Dichloroethane	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
1,2-Dichloropropane	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
1,3,5-Trimethylbenzene	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
1,3-Dichlorobenzene	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
1,4-Dichlorobenzene	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2-Butanone (Methyl Ethyl Ketone)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2-Hexanone	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
4-Methyl-2-Pentanone (Methyl Isobutyl Ketone)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Acetone	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Benzene	-	-	-	-	-	-	-	-	1300J	-	-	-	7700JB	4100J	7400J	15000JB
Bromodichloromethane	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Bromoform	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Bromomethane (Methyl Bromide)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Carbon disulfide	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Carbon tetrachloride	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Chlorobenzene	-	-	-	-	-	-	-	-	20000J	-	-	-	-	-	-	-
Chloroethane	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Chloroform (Trichloromethane)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Chloromethane (Methyl Chloride)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
cis-1,2-Dichloroethene	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Cyclohexane	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Dibromochloromethane	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Dichlorodifluoromethane (CFC-12)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Ethylbenzene	-	-	-	-	-	-	-	-	300J	-	-	-	200J	470J	520J	520J
Isopropylbenzene	-	-	-	-	-	-	-	-	4	-	-	-	-	-	-	-
Methyl acetate	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Methyl cyclohexane	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Methyl Tert Butyl Ether	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Methylene chloride	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Styrene	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Tetrachloroethene	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Toluene	3500J	12000J	11000J	1500J	22000J	9300J	7600J	24000J	8100J	1500J	7600J	6700J	470	3100J	1500J	670
trans-1,2-Dichloroethene	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Trichloroethene	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Trichlorofluoromethane (CFC-11)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Trifluorotrichloroethane (Freon 113)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Vinyl chloride	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Xylene (total)	1700J	3800J	3700J	1800J	4600J	2600J	2100J	5700J	3200J	3200J	3800J	3400J	350J	1800J	1500J	1200J
cis-1,3-Dichloropropene	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
trans-1,3-Dichloropropene	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
1,3-Dichloropropene (Total)																
Metals																
Iron	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Iron (Dissolved)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Manganese	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Manganese (Dissolved)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
General Chemistry																
Ammonia	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nitrate (as N)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nitrite (as N)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Orthophosphate	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Sulfate	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Sulfide	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Organic Carbon (TOC)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

Notes:

ND ( ) - Not detected above the value in parenthesis.
Organics:
J - Laboratory qualified as an estimated value.
B - Laboratory qualifier: Method blank contamination. The associated method blank contains the target analyte at a reportable level.
(1) Cleanup criteria identified by MDEQ RRD Op Memo No. 1 dated 6/21/2005 pursuant to 1994 PA 451 as amended.
[1000J] Exceeds Part 201 Generic Criteria, referenced by column.

TABLE 5

HISTORICAL ANALYTICAL DATA
EAGLEPICHER - WOLVERINE GASKET
INKSTER, MICHIGAN

Sample Location	Units	MW-3	MW-3	MW-3	MW-3	MW-5	MW-5	MW-6	MW-6	MW-6	MW-6	MW-6	MW-6	MW-7	MW-7	MW-7	MW-7	MW-7	MW-7	MW-7	MW-7	MW-7	MW-7	MW-7	MW-7	MW-7	MW-7	MW-7
Sample Identification		GW-35298-021605-BF-039	GW-35298-021605-BF-040	GW-35298-092005-JT-044	GW-35298-092005-JT-045	MW-5	GW-35298-061704-BF-027	MW-6	MW-6	MW-6	MW-6	MW-6	GW-35298-061704-BF-023	MW-7	MW-7	MW-7	MW-7	MW-7	MW-7	MW-7	MW-7	MW-7	MW-7	MW-7	MW-7	MW-7	MW-7	MW-7
Sample Date		2/16/2005	2/16/2005	9/20/2005	9/20/2005	5/11/1999	6/17/2004	5/11/1999	11/14/2000	5/22/2001	1/14/2002	9/27/2002	6/17/2004	5/1/1992	12/1/1992	5/1/1993	12/1/1993	8/1/1994	11/1/1994	4/1/1995	11/1/1995	5/11/1999	9/1/1999	2/1/2000	7/1/2000	11/14/2000	5/22/2001	1/14/2002
Sample Type			Duplicate		Duplicate																							
Target Compound List Volatile Organic Compounds																												
1,1,1-Trichloroethane	ug/L	ND(25)	ND(22)	ND(330)	ND(330)	-	ND(1.0)	-	-	-	-	-	ND(1.0)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
1,1,2,2-Tetrachloroethane	ug/L	ND(25)	ND(22)	ND(330)	ND(330)	-	ND(1.0)	-	-	-	-	-	ND(1.0)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
1,1,2-Trichloroethane	ug/L	ND(25)	ND(22)	ND(330)	ND(330)	-	ND(1.0)	-	-	-	-	-	ND(1.0)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
1,1-Dichloroethane	ug/L	ND(25)	ND(22)	ND(330)	ND(330)	-	ND(1.0)	-	-	-	-	-	ND(1.0)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
1,1-Dichloroethene	ug/L	ND(25)	ND(22)	ND(330)	ND(330)	-	ND(1.0)	-	-	-	-	-	ND(1.0)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
1,2,4-Trichlorobenzene	ug/L	13 J B	4.6 J B	ND(1700)	ND(1700)	-	ND(5.0)	-	-	-	-	-	ND(5.0)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
1,2,4-Trimethylbenzene	ug/L	-	-	ND(330)	ND(330)	ND(1.0)	ND(1.0)	ND(1.0)	-	-	-	-	ND(1.0)	-	-	-	-	-	-	-	-	ND(100)	-	-	-	-	-	-
1,2-Dibromo-3-chloropropane (DBCP)	ug/L	ND(25)	ND(22)	ND(330)	ND(330)	-	ND(1.0)	-	-	-	-	-	ND(1.0)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
1,2-Dibromoethane (Ethylene Dibromide)	ug/L	ND(25)	ND(22)	ND(330)	ND(330)	-	ND(1.0)	-	-	-	-	-	ND(1.0)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
1,2-Dichlorobenzene	ug/L	ND(25)	ND(22)	ND(330)	ND(330)	-	ND(1.0)	-	-	-	-	-	ND(1.0)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
1,2-Dichloroethane	ug/L	ND(25)	ND(22)	ND(330)	ND(330)	-	ND(1.0)	-	-	-	-	-	ND(1.0)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
1,2-Dichloropropane	ug/L	ND(25)	ND(22)	ND(330)	ND(330)	-	ND(1.0)	-	-	-	-	-	ND(1.0)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
1,3,5-Trimethylbenzene	ug/L	-	-	ND(330)	ND(330)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
1,3-Dichlorobenzene	ug/L	ND(25)	ND(22)	ND(330)	ND(330)	-	ND(1.0)	-	-	-	-	-	ND(1.0)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
1,4-Dichlorobenzene	ug/L	ND(25)	ND(22)	ND(330)	ND(330)	-	ND(1.0)	-	-	-	-	-	ND(1.0)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2-Butanone (Methyl Ethyl Ketone)	ug/L	ND(120)	ND(560)	ND(8300)	ND(8300)	-	ND(25)	-	-	-	-	-	ND(25)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2-Hexanone	ug/L	ND(1200)	ND(1100)	ND(17000)	ND(17000)	-	ND(50)	-	-	-	-	-	ND(50)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
4-Methyl-2-Pentanone (Methyl Isobutyl Ketone)	ug/L	ND(1200)	ND(1100)	ND(17000)	ND(17000)	-	ND(50)	-	-	-	-	-	ND(50)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Acetone	ug/L	27 J	21 J	ND(8300)	ND(8300)	-	ND(25)	-	-	-	-	-	ND(25)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Benzene	ug/L	670 J	590 J	11000 JB	11000 JB	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)	-	-	-	-	-	-	-	-	9900 JB	-	-	-	3800 JB	2600 J	6400 JB
Bromodichloromethane	ug/L	ND(15)	ND(22)	ND(330)	ND(330)	-	ND(1.0)	-	-	-	-	-	ND(1.0)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Bromoform	ug/L	ND(15)	ND(22)	ND(330)	ND(330)	-	ND(1.0)	-	-	-	-	-	ND(1.0)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Bromomethane (Methyl Bromide)	ug/L	ND(15)	ND(22)	ND(330)	ND(330)	-	ND(1.0)	-	-	-	-	-	ND(1.0)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Carbon disulfide	ug/L	ND(120)	ND(110)	ND(1700)	ND(1700)	-	ND(5.0)	-	-	-	-	-	ND(5.0)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Carbon tetrachloride	ug/L	ND(25)	ND(22)	ND(330)	ND(330)	-	ND(1.0)	-	-	-	-	-	ND(1.0)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Chlorobenzene	ug/L	630 J	550 J	4900 J	4800 J	ND(1.0)	ND(1.0)	ND(1.0)	-	-	-	-	6.1	-	-	-	-	-	-	-	-	180000 J	-	-	-	-	-	-
Chloroethane	ug/L	ND(25)	ND(22)	ND(330)	ND(330)	-	ND(1.0)	-	-	-	-	-	ND(1.0)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Chloroform (Trichloromethane)	ug/L	ND(25)	ND(22)	ND(330)	ND(330)	-	ND(1.0)	-	-	-	-	-	ND(1.0)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Chloromethane (Methyl Chloride)	ug/L	ND(25)	ND(22)	ND(330)	ND(330)	-	ND(1.0)	-	-	-	-	-	ND(1.0)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
cis-1,2-Dichloroethene	ug/L	ND(25)	ND(22)	ND(330)	ND(330)	-	ND(1.0)	-	-	-	-	-	ND(1.0)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Cyclohexane	ug/L	ND(25)	ND(22)	ND(330)	ND(330)	-	ND(1.0)	-	-	-	-	-	ND(1.0)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Dibromochloromethane	ug/L	ND(25)	ND(22)	ND(330)	ND(330)	-	ND(1.0)	-	-	-	-	-	ND(1.0)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Dichlorodifluoromethane (CFC-12)	ug/L	ND(25)	ND(22)	ND(330)	ND(330)	-	ND(1.0)	-	-	-	-	-	ND(1.0)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Ethylbenzene	ug/L	25	20 J	97 J	98 J	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)	-	-	-	-	-	-	-	-	11000 J	-	-	-	5000 J	2400 J	4800 J
Isopropylbenzene	ug/L	ND(120)	ND(110)	ND(1700)	ND(1700)	ND(1.0)	ND(5.0)	ND(1.0)	-	-	-	-	ND(5.0)	-	-	-	-	-	-	-	-	ND(100)	-	-	-	-	-	-
Methyl acetate	ug/L	ND(250)	ND(220)	ND(3300)	ND(3300)	-	ND(10)	-	-	-	-	-	ND(10)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Methyl cyclohexane	ug/L	ND(25)	ND(22)	ND(330)	ND(330)	-	ND(1.0)	-	-	-	-	-	ND(1.0)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Methyl Tert Butyl Ether	ug/L	ND(120)	ND(110)	ND(1700)	ND(1700)	-	ND(5.0)	-	-	-	-	-	ND(5.0)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Methylene chloride	ug/L	ND(120)	ND(110)	ND(1700)	ND(1700)	-	ND(5.0)	-	-	-	-	-	ND(5.0)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Styrene	ug/L	ND(25)	ND(22)	ND(330)	ND(330)	-	ND(1.0)	-	-	-	-	-	ND(1.0)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Tetrachloroethene	ug/L	ND(25)	ND(22)	ND(330)	ND(330)	-	ND(1.0)	-	-	-	-	-	ND(1.0)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Toluene	ug/L	11 J	8.7 J	ND(330)	ND(330)	ND(1.0)	ND(1.0)	1.4	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)	4000 J	47000 J	780000 J	12000 J	25000 J	16000 J	56000 J	37000 J	35000 J	4900 J	12000 J	26000 J	14000 J	4400 J	9400 J
trans-1,2-Dichloroethene	ug/L	ND(25)	ND(22)	ND(330)	ND(330)	-	ND(1.0)	-	-	-	-	-	ND(1.0)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Trichloroethene	ug/L	ND(25)	ND(22)	ND(330)	ND(330)	-	ND(1.0)	-	-	-	-	-	ND(1.0)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Trichlorofluoromethane (CFC-11)	ug/L	ND(25)	ND(22)	ND(330)	ND(330)	-	ND(1.0)	-	-	-	-	-	ND(1.0)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Trifluorotrichloroethane (Freon 113)	ug/L	ND(25)	ND(22)	ND(330)	ND(330)	-	ND(1.0)	-	-	-	-	-	ND(1.0)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Vinyl chloride	ug/L	ND(25)	ND(22)	ND(330)	ND(330)	-	ND(1.0)	-	-	-	-	-	ND(1.0)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Xylene (total)	ug/L	33 J	28 J	ND(670)	ND(670)	ND(3.0)	ND(2.0)	ND(3.0)	ND(3.0)	ND(3.0)	ND(3.0)	ND(3.0)	ND(2.0)	56000 J	58000 J	15000 J	20000 J	30000 J	15000 J	51000 J	41000 J	44000 J	24000 J	56000 J	32000 J	22000 J	10000 J	20000 J
cis-1,3-Dichloropropene	ug/L	ND(25)	ND(22)	ND(330)	ND(330)	-	ND(1.0)	-	-	-	-	-	ND(1.0)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
trans-1,3-Dichloropropene	ug/L	ND(25)	ND(22)	ND(330)	ND(330)	-	ND(1.0)	-	-	-	-	-	ND(1.0)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
1,3-Dichloropropene (Total)	ug/L																											
Metals																												
Iron	mg/L	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Iron (Dissolved)	mg/L	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Manganese	mg/L	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Manganese (Dissolved)	mg/L	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
General Chemistry																												
Ammonia	mg/L	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nitrate (as N)	mg/L	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nitrite (as N)	mg/L	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Orthophosphate	mg/L	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Sulfate	mg/L	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Sulfide	mg/L	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Organic Carbon (TOC)	mg/L	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

Notes:

ND ( ) - Not detected above the value in parenthesis.

Organics:

J - Laboratory qualified as an estimated value.

B - Laboratory qualifier: Method blank contamination. The associated method blank contains the target analyte at a reportable level.

(1) Cleanup criteria identified by MDEQ RRD Op Memo No. 1 dated 6/24/2005 pursuant to 1994 PA 451 as amended.

10XX	Exceeds Part 201 Generic Criteria, referenced by column.

CRA 035361-T5O

TABLE 5

HISTORICAL ANALYTICAL DATA
EAGLEPICHER - WOLVERINE GASKET
INKSTER, MICHIGAN

Sample Location		MW-7	MW-7	MW-7	MW-7	MW-8	MW-8	MW-8	MW-8	MW-9	MW-9	MW-9	MW-9	MWO-01	MWO-01	MWO-01	MWO-01	MWO-01	MWO-01	MWO-01	MWO-01
Sample Identification		MW-7	GW-35298-061704-BF-033	GW-35298-021605-BF-037	GW-35298-092005-JY-046	MW-8	GW-35298-061704-BF-038	GW-35298-021605-BF-042	GW-35298-092005-JY-049	MW-9	GW-35298-061704-BF-024	GW-35298-021605-BF-041	GW-35298-092005-JY-047	MWO-01	MWO-01	MWO-01	MWO-01	MWO-01	MWO-01	GW-35298-061704-BF-021	GW-35298-092005-JY-051
Sample Date		9/27/2002	6/18/2004	2/16/2005	9/20/2005	11/11/2002	6/18/2004	2/16/2005	9/20/2005	11/11/2002	6/17/2004	2/16/2005	9/20/2005	11/9/1989	5/11/1999	11/14/2000	5/22/2001	11/6/2001	9/27/2002	6/17/2004	9/20/2005
Sample Type																					
	Units																				
Target Compound List Volatile Organic Compounds																					
1,1,1-Trichloroethane	ug/L	–	ND(3300)	ND(1700)	ND(5000)	–	ND(25)	0.23 J	2.7 J	–	ND(1200)	ND(1200)	ND(1200)	–	–	–	–	–	–	ND(1.0)	ND(1.0)
1,1,2,2-Tetrachloroethane	ug/L	–	ND(3300)	ND(1700)	ND(5000)	–	ND(25)	ND(1.0)	ND(5.7)	–	ND(1200)	ND(1200)	ND(1200)	–	–	–	–	–	–	ND(1.0)	ND(1.0)
1,1,2-Trichloroethane	ug/L	–	ND(3300)	ND(1700)	ND(5000)	–	ND(25)	ND(1.0)	ND(5.7)	–	ND(1200)	ND(1200)	ND(1200)	–	–	–	–	–	–	ND(1.0)	ND(1.0)
1,1-Dichloroethane	ug/L	–	ND(3300)	ND(1700)	ND(5000)	59	39	0.23 J	21	ND(1)	ND(1200)	ND(1200)	ND(1200)	–	–	–	–	–	–	ND(1.0)	ND(1.0)
1,1-Dichloroethene	ug/L	–	ND(3300)	ND(1700)	ND(5000)	–	ND(25)	ND(1.0)	ND(5.7)	–	ND(1200)	ND(1200)	ND(1200)	–	–	–	–	–	–	ND(1.0)	ND(1.0)
1,2,4-Trichlorobenzene	ug/L	–	ND(17000)	ND(8300)	ND(25000)	–	ND(120)	ND(5.0)	ND(29)	–	ND(6200)	ND(6200)	ND(6200)	–	–	–	–	–	–	ND(5.0)	ND(5.0)
1,2,4-Trimethylbenzene	ug/L	–	ND(3300)	–	ND(5000)	–	ND(25)	–	ND(5.7)	–	ND(1200)	–	ND(1200)	–	ND(1.0)	–	–	–	–	ND(1.0)	ND(1.0)
1,2-Dibromo-3-chloropropane (DBCP)	ug/L	–	ND(3300)	ND(1700)	ND(5000)	–	ND(25)	ND(1.0)	ND(5.7)	–	ND(1200)	ND(1200)	ND(1200)	–	–	–	–	–	–	ND(1.0)	ND(1.0)
1,2-Dibromoethane (Ethylene Dibromide)	ug/L	–	ND(3300)	ND(1700)	ND(5000)	–	ND(25)	ND(1.0)	ND(5.7)	–	ND(1200)	ND(1200)	ND(1200)	–	–	–	–	–	–	ND(1.0)	ND(1.0)
1,2-Dichlorobenzene	ug/L	–	ND(3300)	ND(1700)	ND(5000)	–	ND(25)	ND(1.0)	ND(5.7)	–	ND(1200)	ND(1200)	ND(1200)	–	–	–	–	–	–	ND(1.0)	ND(1.0)
1,2-Dichloroethane	ug/L	–	ND(3300)	ND(1700)	ND(5000)	–	ND(25)	ND(1.0)	ND(5.7)	–	ND(1200)	ND(1200)	ND(1200)	–	–	–	–	–	–	ND(1.0)	0.65 J
1,2-Dichloropropane	ug/L	–	ND(3300)	ND(1700)	ND(5000)	–	ND(25)	ND(1.0)	ND(5.7)	–	ND(1200)	ND(1200)	ND(1200)	–	–	–	–	–	–	ND(1.0)	ND(1.0)
1,3,5-Trimethylbenzene	ug/L	–	–	–	ND(5000)	–	–	–	ND(5.7)	–	–	–	ND(1200)	–	–	–	–	–	–	–	ND(1.0)
1,3-Dichlorobenzene	ug/L	–	ND(3300)	ND(1700)	ND(5000)	–	ND(25)	ND(1.0)	ND(5.7)	–	ND(1200)	ND(1200)	ND(1200)	–	–	–	–	–	–	ND(1.0)	ND(1.0)
1,4-Dichlorobenzene	ug/L	–	ND(3300)	ND(1700)	ND(5000)	–	ND(25)	ND(1.0)	1.5 J	–	ND(1200)	ND(1200)	ND(1200)	–	–	–	–	–	–	ND(1.0)	ND(1.0)
2-Butanone (Methyl Ethyl Ketone)	ug/L	–	ND(33000)	ND(42000)	ND(120000)	–	ND(620)	ND(25)	6.4 J	–	ND(10000)	ND(21000)	ND(10000)	–	–	–	–	–	–	ND(25)	ND(25)
2-Hexanone	ug/L	–	ND(170000)	ND(83000)	ND(250000)	–	ND(1200)	ND(50)	ND(290)	–	ND(62000)	ND(62000)	ND(62000)	–	–	–	–	–	–	ND(50)	ND(50)
4-Methyl-2-Pentanone (Methyl Isobutyl Ketone)	ug/L	–	ND(170000)	ND(83000)	ND(250000)	–	ND(1200)	ND(50)	ND(290)	–	ND(62000)	ND(62000)	ND(62000)	–	–	–	–	–	–	ND(50)	ND(50)
Acetone	ug/L	–	ND(83000)	ND(42000)	ND(120000)	–	ND(620)	5.9 J	170	–	ND(31000)	1300 J	ND(31000)	–	–	–	–	–	–	ND(25)	ND(25)
Benzene	ug/L	6600	14000	4400	27000	16	59	1.4	6.5	47000	44000	35000	37000	–	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)
Bromodichloromethane	ug/L	–	ND(3300)	ND(1700)	ND(5000)	–	ND(25)	ND(1.0)	ND(5.7)	–	ND(1200)	ND(1200)	ND(1200)	–	–	–	–	–	–	ND(1.0)	ND(1.0)
Bromoform	ug/L	–	ND(3300)	ND(1700)	ND(5000)	–	ND(25)	ND(1.0)	ND(5.7)	–	ND(1200)	ND(1200)	ND(1200)	–	–	–	–	–	–	ND(1.0)	ND(1.0)
Bromomethane (Methyl Bromide)	ug/L	–	ND(3300)	ND(1700)	ND(5000)	–	ND(25)	ND(1.0)	ND(5.7)	–	ND(1200)	ND(1200)	ND(1200)	–	–	–	–	–	–	ND(1.0)	ND(1.0)
Carbon disulfide	ug/L	–	ND(17000)	ND(8300)	ND(25000)	–	ND(120)	ND(5.0)	ND(29)	–	ND(6200)	ND(6200)	ND(6200)	–	–	–	–	–	–	ND(5.0)	ND(5.0)
Carbon tetrachloride	ug/L	–	ND(3300)	ND(1700)	ND(5000)	–	ND(25)	ND(1.0)	ND(5.7)	–	ND(1200)	ND(1200)	ND(1200)	–	–	–	–	–	–	ND(1.0)	ND(1.0)
Chlorobenzene	ug/L	–	86000	43000	110000	370	650	24	180	7600	8600	6600	4300	–	ND(1.0)	–	–	–	–	5.5	0.26 J
Chloroethane	ug/L	–	ND(3300)	ND(1700)	ND(5000)	–	ND(25)	ND(1.0)	12	–	ND(1200)	ND(1200)	ND(1200)	–	–	–	–	–	–	ND(1.0)	ND(1.0)
Chloroform (Trichloromethane)	ug/L	–	ND(3300)	ND(1700)	ND(5000)	–	ND(25)	0.22 J	1.5 J	–	ND(1200)	ND(1200)	ND(1200)	–	–	–	–	–	–	ND(1.0)	ND(1.0)
Chloromethane (Methyl Chloride)	ug/L	–	ND(3300)	ND(1700)	ND(5000)	–	ND(25)	ND(1.0)	ND(5.7)	–	ND(1200)	ND(1200)	ND(1200)	–	–	–	–	–	–	ND(1.0)	ND(1.0)
cis-1,2-Dichloroethene	ug/L	–	ND(3300)	ND(1700)	ND(5000)	–	ND(25)	ND(1.0)	ND(5.7)	–	ND(1200)	ND(1200)	ND(1200)	–	–	–	–	–	–	ND(1.0)	ND(1.0)
Cyclohexane	ug/L	–	ND(3300)	ND(1700)	ND(5000)	–	ND(25)	ND(1.0)	ND(5.7)	–	ND(1200)	ND(1200)	ND(1200)	–	–	–	–	–	–	ND(1.0)	ND(1.0)
Dibromochloromethane	ug/L	–	ND(3300)	ND(1700)	ND(5000)	–	ND(25)	ND(1.0)	ND(5.7)	–	ND(1200)	ND(1200)	ND(1200)	–	–	–	–	–	–	ND(1.0)	ND(1.0)
Dichlorodifluoromethane (CFC-12)	ug/L	–	ND(3300)	ND(1700)	ND(5000)	–	ND(25)	ND(1.0)	ND(5.7)	–	ND(1200)	ND(1200)	ND(1200)	–	–	–	–	–	–	ND(1.0)	ND(1.0)
Ethylbenzene	ug/L	760	4200	2000	5300	12	ND(25)	1.3	5.8	110	ND(1200)	ND(1200)	ND(1200)	–	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)
Isopropylbenzene	ug/L	–	ND(17000)	ND(8300)	ND(25000)	–	ND(120)	ND(5.0)	ND(29)	–	ND(6200)	ND(6200)	ND(6200)	–	ND(1.0)	–	–	–	–	ND(5.0)	ND(5.0)
Methyl acetate	ug/L	–	ND(33000)	ND(17000)	ND(50000)	–	ND(250)	ND(10)	ND(57)	–	ND(12000)	ND(12000)	ND(12000)	–	–	–	–	–	–	ND(10)	ND(10)
Methyl cyclohexane	ug/L	–	ND(3300)	ND(1700)	ND(5000)	–	ND(25)	ND(1.0)	ND(5.7)	–	ND(1200)	ND(1200)	ND(1200)	–	–	–	–	–	–	ND(1.0)	ND(1.0)
Methyl Tert Butyl Ether	ug/L	–	ND(17000)	ND(8300)	ND(25000)	–	ND(120)	ND(5.0)	ND(29)	–	ND(6200)	ND(6200)	ND(6200)	–	–	–	–	–	–	ND(5.0)	ND(5.0)
Methylene chloride	ug/L	–	ND(17000)	450 J B	ND(25000)	–	ND(120)	ND(5.0)	ND(29)	–	ND(6200)	ND(6200)	ND(6200)	–	–	–	–	–	–	ND(5.0)	ND(5.0)
Styrene	ug/L	–	ND(3300)	ND(1700)	ND(5000)	–	ND(25)	ND(1.0)	ND(5.7)	–	ND(1200)	ND(1200)	ND(1200)	–	–	–	–	–	–	ND(1.0)	ND(1.0)
Tetrachloroethene	ug/L	–	ND(3300)	ND(1700)	ND(5000)	–	ND(25)	ND(1.0)	ND(5.7)	–	ND(1200)	ND(1200)	ND(1200)	–	–	–	–	–	–	ND(1.0)	ND(1.0)
Toluene	ug/L	410	9900	6300	16000	6.6	190	12	1.2 J	ND(1)	ND(1200)	ND(1200)	ND(1200)	3	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)
trans-1,2-Dichloroethene	ug/L	–	ND(3300)	ND(1700)	ND(5000)	–	ND(25)	ND(1.0)	ND(5.7)	–	ND(1200)	ND(1200)	ND(1200)	–	–	–	–	–	–	ND(1.0)	ND(1.0)
Trichloroethene	ug/L	–	ND(3300)	ND(1700)	ND(5000)	–	ND(25)	ND(1.0)	ND(5.7)	–	ND(1200)	ND(1200)	ND(1200)	–	–	–	–	–	–	ND(1.0)	ND(1.0)
Trichlorofluoromethane (CFC-11)	ug/L	–	ND(3300)	ND(1700)	ND(5000)	–	ND(25)	ND(1.0)	ND(5.7)	–	ND(1200)	ND(1200)	ND(1200)	–	–	–	–	–	–	ND(1.0)	ND(1.0)
Trifluorotrichloroethane (Freon 113)	ug/L	–	ND(3300)	ND(1700)	ND(5000)	–	ND(25)	ND(1.0)	ND(5.7)	–	ND(1200)	ND(1200)	ND(1200)	–	–	–	–	–	–	ND(1.0)	ND(1.0)
Vinyl chloride	ug/L	–	ND(3300)	ND(1700)	ND(5000)	–	ND(25)	ND(1.0)	ND(5.7)	–	ND(1200)	ND(1200)	ND(1200)	–	–	–	–	–	–	ND(1.0)	ND(1.0)
Xylene (total)	ug/L	3000	13000	7800	22000	50	74	5.6	21	250	ND(3600)	ND(3600)	ND(3600)	10	ND(3.0)	ND(3.0)	ND(3.0)	ND(3.0)	ND(3.0)	ND(3.0)	ND(3.0)
cis-1,3-Dichloropropene	ug/L	–	ND(3300)	ND(1700)	ND(5000)	–	ND(25)	ND(1.0)	ND(5.7)	–	ND(1200)	ND(1200)	ND(1200)	–	–	–	–	–	–	ND(1.0)	ND(1.0)
trans-1,3-Dichloropropene	ug/L	–	ND(3300)	ND(1700)	ND(5000)	–	ND(25)	ND(1.0)	ND(5.7)	–	ND(1200)	ND(1200)	ND(1200)	–	–	–	–	–	–	ND(1.0)	ND(1.0)
1,3-Dichloropropene (Total)	ug/L																				
Metals																					
Iron	mg/L	–	1.7	–	–	–	0.85	–	–	–	3.3	–	–	–	–	–	–	–	–	–	–
Iron (Dissolved)	mg/L	–	1.4	–	–	–	0.16	–	–	–	2.3	–	–	–	–	–	–	–	–	–	–
Manganese	mg/L	–	1.3	–	–	–	0.35	–	–	–	3.3	–	–	–	–	–	–	–	–	–	–
Manganese (Dissolved)	mg/L	–	1.3	–	–	–	0.37	–	–	–	3.3	–	–	–	–	–	–	–	–	–	–
General Chemistry																					
Ammonia	mg/L	–	12	–	–	–	7.3	–	–	–	0.2	–	–	–	–	–	–	–	–	–	–
Nitrate (as N)	mg/L	–	ND(0.10)	–	–	–	0.22	–	–	–	ND(0.10)	–	–	–	–	–	–	–	–	–	–
Nitrite (as N)	mg/L	–	ND(0.10)	–	–	–	0.11	–	–	–	ND(0.10)	–	–	–	–	–	–	–	–	–	–
Orthophosphate	mg/L	–	1.1	–	–	–	2.3	–	–	–	ND(0.50)	–	–	–	–	–	–	–	–	–	–
Sulfate	mg/L	–	11.5	–	–	–	36.9	–	–	–	ND(1.0)	–	–	–	–	–	–	–	–	–	–
Sulfide	mg/L	–	ND(1.0)	–	–	–	ND(1.0)	–	–	–	ND(1.0)	–	–	–	–	–	–	–	–	–	–
Total Organic Carbon (TOC)	mg/L	–	15	–	–	–	35	–	–	–	13	–	–	–	–	–	–	–	–	–	–

Notes:

ND ( ) - Not detected above the value in parenthesis.

Organics:

J - Laboratory qualified as an estimated value.

B - Laboratory qualifier: Method blank contamination. The associated method blank contains the target analyte at a reportable level.

(1) Cleanup criteria identified by MDEQ RRD Op Memo No. 1 dated 6/24/2005 pursuant to 1994 PA 451 as amended.

1000 Exceeds Part 201 Generic Criteria, referenced by column.

CRA 42-04-1-150

MI0013174

TABLE 5

HISTORICAL ANALYTICAL DATA
EAGLEPICHER - WOLVERINE GASKET
INKSTER, MICHIGAN

Sample Location		MWO-02	MWO-02	MWO-02	MWO-02	MWO-02	MWO-02	MWO-02	MWO-02	MWO-03	MWO-03	MWO-03	MWO-03	MWO-03	MWO-03	MWO-03	MWO-03
Sample Identification		MWO-02	MWO-02	MWO-02	MWO-02	MWO-02	MWO-02	GW-35298-061704-BF-020	GW-35298-092005-TY-052	MWO-03	MWO-03	MWO-03	MWO-03	MWO-03	MWO-03	GW-35298-061704-BF-022	GW-35298-092005-TY-053
Sample Date		11/9/1989	5/11/1999	11/14/2000	5/23/2001	11/14/2002	9/27/2002	6/17/2004	9/20/2005	11/9/1989	5/11/1999	11/14/2000	5/23/2001	11/14/2002	9/27/2002	6/17/2004	9/20/2005
Sample Type																	
	Units																
Target Compound List Volatile Organic Compounds																	
1,1,1-Trichloroethane	ug/L	–	–	–	–	–	–	ND(1.4)	ND(20)	–	–	–	–	–	–	ND(1.0)	ND(1.0)
1,1,2,2-Tetrachloroethane	ug/L	–	–	–	–	–	–	ND(1.4)	ND(20)	–	–	–	–	–	–	ND(1.0)	ND(1.0)
1,1,2-Trichloroethane	ug/L	–	–	–	–	–	–	ND(1.4)	ND(20)	–	–	–	–	–	–	ND(1.0)	ND(1.0)
1,1-Dichloroethane	ug/L	–	–	–	–	–	–	ND(1.4)	ND(20)	–	–	–	–	–	–	ND(1.0)	ND(1.0)
1,1-Dichloroethene	ug/L	–	–	–	–	–	–	ND(1.4)	ND(20)	–	–	–	–	–	–	ND(1.0)	ND(1.0)
1,2,4-Trichlorobenzene	ug/L	–	–	–	–	–	–	ND(7.2)	ND(100)	–	–	–	–	–	–	ND(5.0)	ND(5.0)
1,2,4-Trimethylbenzene	ug/L	–	ND(1.0)	–	–	–	–	ND(1.4)	ND(20)	–	ND(1.0)	–	–	–	–	ND(1.0)	ND(1.0)
1,2-Dibromo-3-chloropropane (DBCP)	ug/L	–	–	–	–	–	–	ND(1.4)	ND(20)	–	–	–	–	–	–	ND(1.0)	ND(1.0)
1,2-Dibromoethane (Ethylene Dibromide)	ug/L	–	–	–	–	–	–	ND(1.4)	ND(20)	–	–	–	–	–	–	ND(1.0)	ND(1.0)
1,2-Dichlorobenzene	ug/L	–	–	–	–	–	–	ND(1.4)	ND(20)	–	–	–	–	–	–	ND(1.0)	ND(1.0)
1,2-Dichloroethane	ug/L	–	–	–	–	–	–	ND(1.4)	ND(20)	–	–	–	–	–	–	ND(1.0)	ND(1.0)
1,2-Dichloropropane	ug/L	–	–	–	–	–	–	ND(1.4)	ND(20)	–	–	–	–	–	–	ND(1.0)	ND(1.0)
1,3,5-Trimethylbenzene	ug/L	–	–	–	–	–	–	–	ND(20)	–	–	–	–	–	–	–	ND(1.0)
1,3-Dichlorobenzene	ug/L	–	–	–	–	–	–	ND(1.4)	ND(20)	–	–	–	–	–	–	ND(1.0)	ND(1.0)
1,4-Dichlorobenzene	ug/L	–	–	–	–	–	–	ND(1.4)	ND(20)	–	–	–	–	–	–	ND(1.0)	ND(1.0)
2-Butanone (Methyl Ethyl Ketone)	ug/L	–	–	–	–	–	–	ND(36)	ND(500)	–	–	–	–	–	–	ND(25)	ND(25)
2-Hexanone	ug/L	–	–	–	–	–	–	ND(72)	ND(1000)	–	–	–	–	–	–	ND(50)	ND(50)
4-Methyl-2-Pentanone (Methyl Isobutyl Ketone)	ug/L	–	–	–	–	–	–	ND(72)	ND(1000)	–	–	–	–	–	–	ND(50)	ND(50)
Acetone	ug/L	–	–	–	–	–	–	ND(36)	ND(500)	–	–	–	–	–	–	ND(25)	ND(25)
Benzene	ug/L	–	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.4)	ND(20)	–	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)
Bromodichloromethane	ug/L	–	–	–	–	–	–	ND(1.4)	ND(20)	–	–	–	–	–	–	ND(1.0)	ND(1.0)
Bromoform	ug/L	–	–	–	–	–	–	ND(1.4)	ND(20)	–	–	–	–	–	–	ND(1.0)	ND(1.0)
Bromomethane (Methyl Bromide)	ug/L	–	–	–	–	–	–	ND(1.4)	ND(20)	–	–	–	–	–	–	ND(1.0)	ND(1.0)
Carbon disulfide	ug/L	–	–	–	–	–	–	ND(7.2)	ND(100)	–	–	–	–	–	–	ND(5.0)	ND(5.0)
Carbon tetrachloride	ug/L	–	–	–	–	–	–	ND(1.4)	ND(20)	–	–	–	–	–	–	ND(1.0)	ND(1.0)
Chlorobenzene	ug/L	–	ND(1.0)	–	–	–	–	42	900 (1)	–	ND(1.0)	–	–	–	–	ND(1.0)	0.21 J
Chloroethane	ug/L	–	–	–	–	–	–	ND(1.4)	ND(20)	–	–	–	–	–	–	ND(1.0)	ND(1.0)
Chloroform (Trichloromethane)	ug/L	–	–	–	–	–	–	ND(1.4)	ND(20)	–	–	–	–	–	–	ND(1.0)	ND(1.0)
Chloromethane (Methyl Chloride)	ug/L	–	–	–	–	–	–	ND(1.4)	ND(20)	–	–	–	–	–	–	ND(1.0)	ND(1.0)
cis-1,2-Dichloroethene	ug/L	–	–	–	–	–	–	ND(1.4)	ND(20)	–	–	–	–	–	–	ND(1.0)	ND(1.0)
Cyclohexane	ug/L	–	–	–	–	–	–	ND(1.4)	ND(20)	–	–	–	–	–	–	ND(1.0)	ND(1.0)
Dibromochloromethane	ug/L	–	–	–	–	–	–	ND(1.4)	ND(20)	–	–	–	–	–	–	ND(1.0)	ND(1.0)
Dichlorodifluoromethane (CFC-12)	ug/L	–	–	–	–	–	–	ND(1.4)	ND(20)	–	–	–	–	–	–	ND(1.0)	ND(1.0)
ylbenzene	ug/L	–	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.4)	6.0 J	–	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)
ropylbenzene	ug/L	–	ND(1.0)	–	–	–	–	ND(7.2)	ND(100)	–	ND(1.0)	–	–	–	–	ND(5.0)	ND(5.0)
Methyl acetate	ug/L	–	–	–	–	–	–	ND(14)	ND(200)	–	–	–	–	–	–	ND(10)	ND(10)
Methyl cyclohexane	ug/L	–	–	–	–	–	–	ND(1.4)	ND(20)	–	–	–	–	–	–	ND(1.0)	ND(1.0)
Methyl Tert Butyl Ether	ug/L	–	–	–	–	–	–	ND(7.2)	ND(100)	–	–	–	–	–	–	ND(5.0)	ND(5.0)
Methylene chloride	ug/L	–	–	–	–	–	–	ND(7.2)	ND(100)	–	–	–	–	–	–	ND(5.0)	ND(5.0)
Styrene	ug/L	–	–	–	–	–	–	ND(1.4)	ND(20)	–	–	–	–	–	–	ND(1.0)	ND(1.0)
Tetrachloroethene	ug/L	–	–	–	–	–	–	ND(1.4)	ND(20)	–	–	–	–	–	–	ND(1.0)	ND(1.0)
Toluene	ug/L	21	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.4)	3.2 J	3	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)
trans-1,2-Dichloroethene	ug/L	–	–	–	–	–	–	ND(1.4)	ND(20)	–	–	–	–	–	–	ND(1.0)	ND(1.0)
Trichloroethene	ug/L	–	–	–	–	–	–	ND(1.4)	ND(20)	–	–	–	–	–	–	ND(1.0)	ND(1.0)
Trichlorofluoromethane (CFC-11)	ug/L	–	–	–	–	–	–	ND(1.4)	ND(20)	–	–	–	–	–	–	ND(1.0)	ND(1.0)
Trifluorotrichloroethane (Freon 113)	ug/L	–	–	–	–	–	–	ND(1.4)	ND(20)	–	–	–	–	–	–	ND(1.0)	ND(1.0)
Vinyl chloride	ug/L	–	–	–	–	–	–	ND(1.4)	ND(20)	–	–	–	–	–	–	ND(1.0)	ND(1.0)
Xylene (total)	ug/L	ND(3)	ND(3.0)	ND(3.0)	ND(3.0)	ND(3.0)	ND(3.0)	ND(2.9)	ND(40)	ND(3)	ND(3.0)	ND(3.0)	ND(3.0)	ND(3.0)	ND(3.0)	ND(2.0)	ND(2.0)
cis-1,3-Dichloropropene	ug/L	–	–	–	–	–	–	ND(1.4)	ND(20)	–	–	–	–	–	–	ND(1.0)	ND(1.0)
trans-1,3-Dichloropropene	ug/L	–	–	–	–	–	–	ND(1.4)	ND(20)	–	–	–	–	–	–	ND(1.0)	ND(1.0)
1,3-Dichloropropene (Total)	ug/L																
Metals																	
Iron	mg/L	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–
Iron (Dissolved)	mg/L	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–
Manganese	mg/L	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–
Manganese (Dissolved)	mg/L	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–
General Chemistry																	
Ammonia	mg/L	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–
Nitrate (as N)	mg/L	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–
Nitrite (as N)	mg/L	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–
Orthophosphate	mg/L	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–
Sulfate	mg/L	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–
Sulfide	mg/L	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–
Total Organic Carbon (TOC)	mg/L	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–

Notes:

ND ( ) - Not detected above the value in parenthesis.

Organics:

J - Laboratory qualified as an estimated value.

B - Laboratory qualifier: Method blank contamination. The associated method blank contains the target analyte at a reportable level.

(1) Cleanup criteria identified by MDEQ RRD Op Memo No. 1 dated 6/24/1995 pursuant to 1994 PA 451 as amended.

Exceeds Part 201 Generic Crit. 1000 (1)

CRA 02341-130

MI0013175

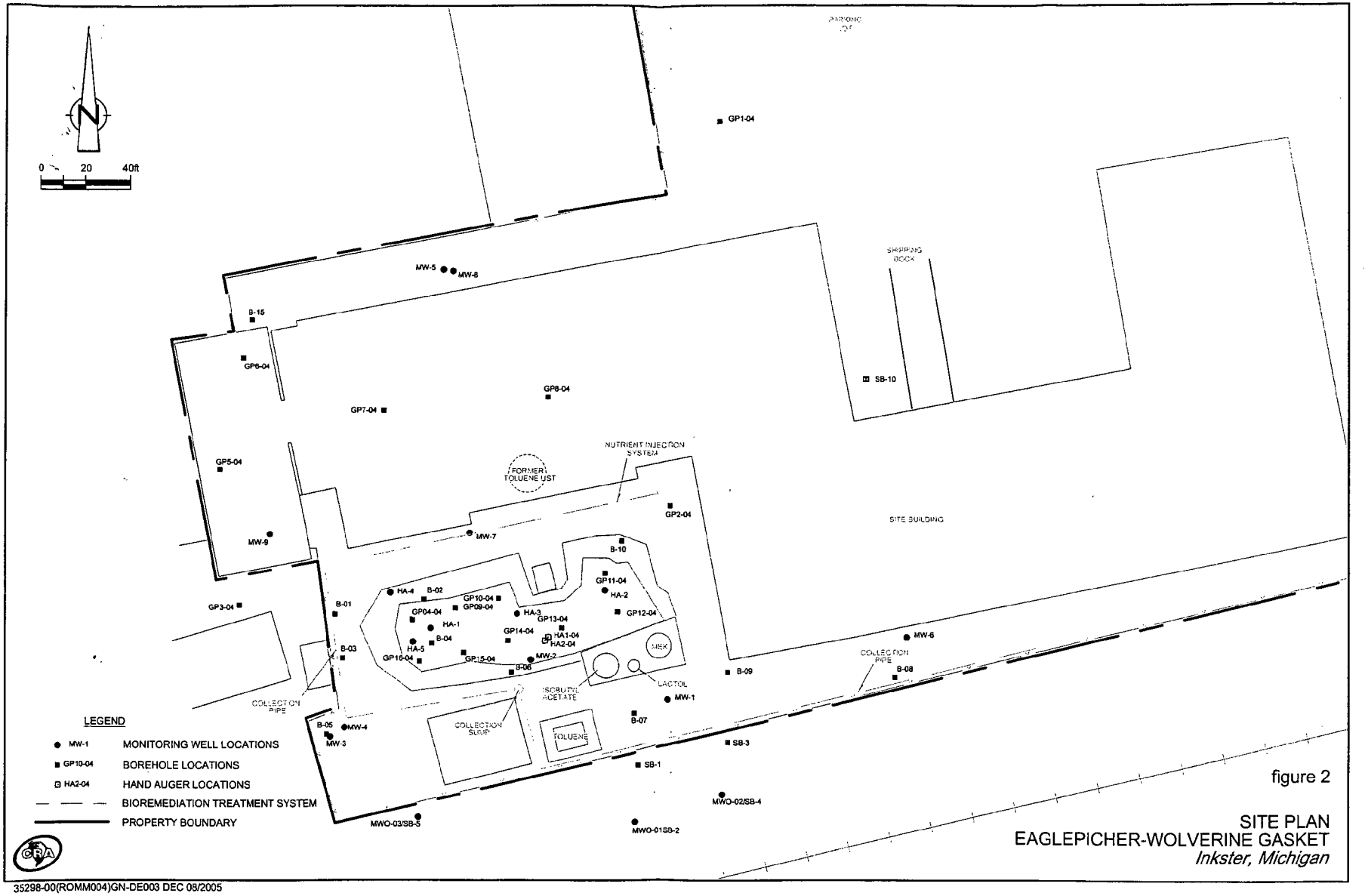
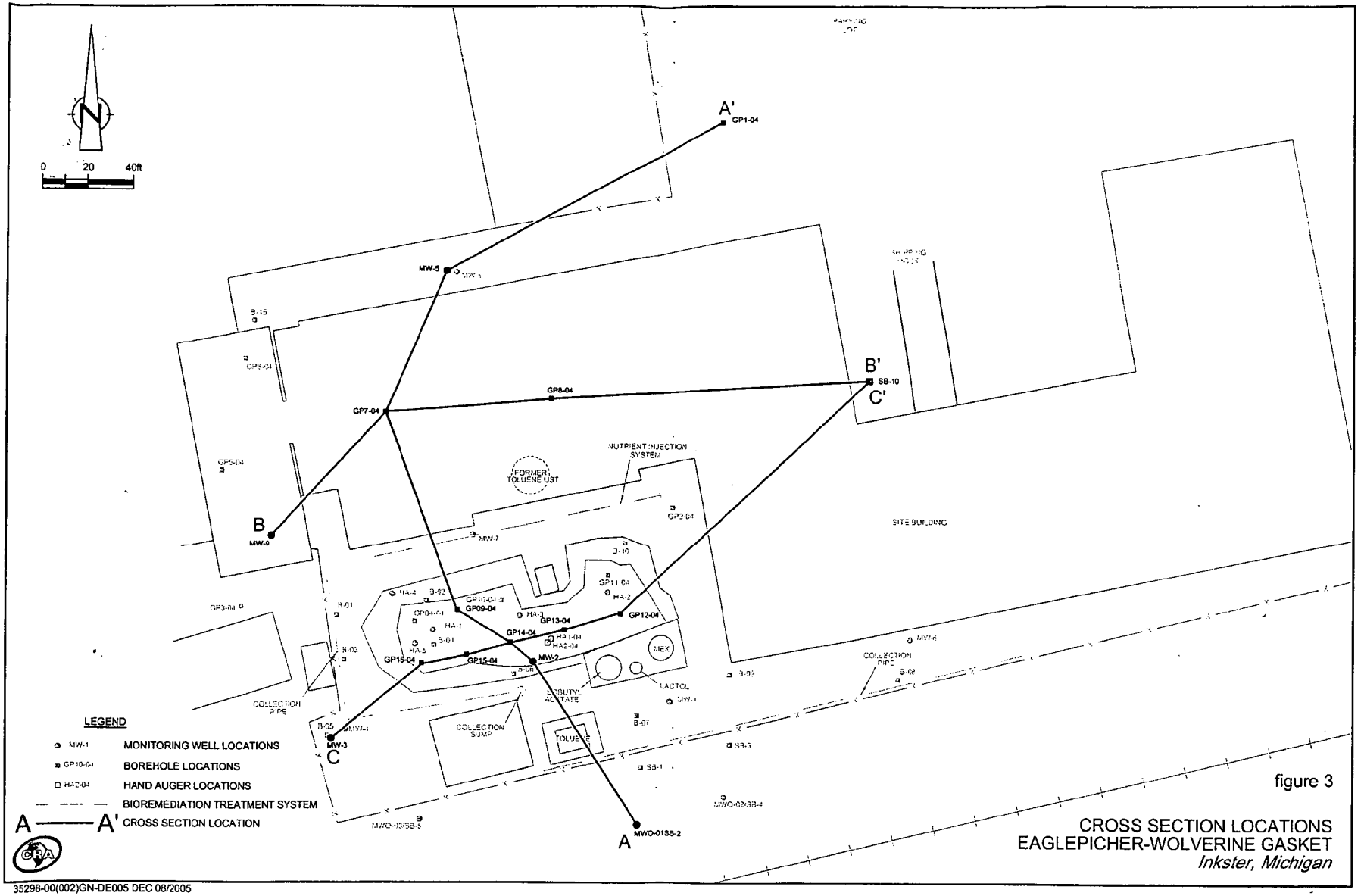


figure 2

SITE PLAN
EAGLEPICHER-WOLVERINE GASKET
Inkster, Michigan

35298-00(ROMM004)GN-DE003 DEC 08/2005

MI0013176

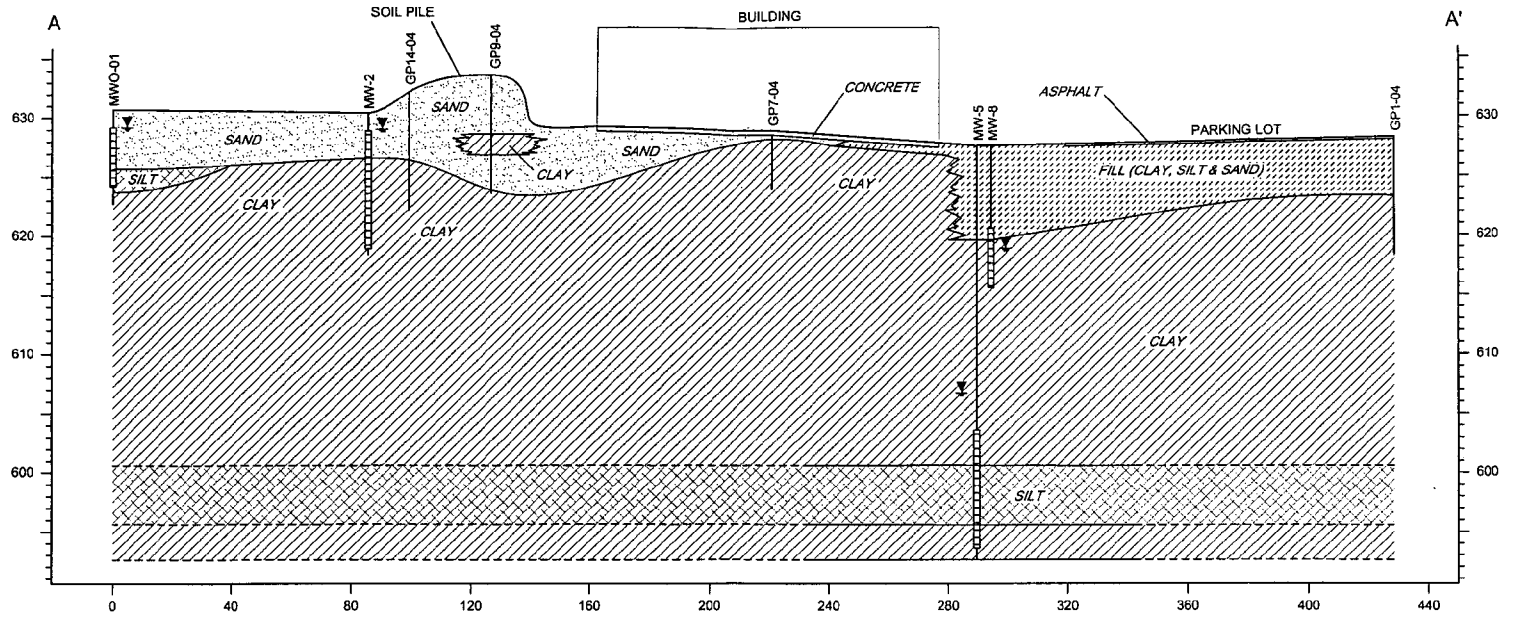


35298-00(002)GN-DE005 DEC 08/2005

figure 3

CROSS SECTION LOCATIONS
EAGLEPICHER-WOLVERINE GASKET
Inkster, Michigan

MI0013177



LEGEND

- SAND
- CLAY
- SILT
- FILL (CLAY, SILT, & SAND)
- ASPHALT/CONCRETE

MWO-01
- WELL I.D.
- WELL
- WELL SCREEN
- WATER LEVEL, JUNE 2004
- WATER LEVEL, DEEP WELL, JUNE 2004

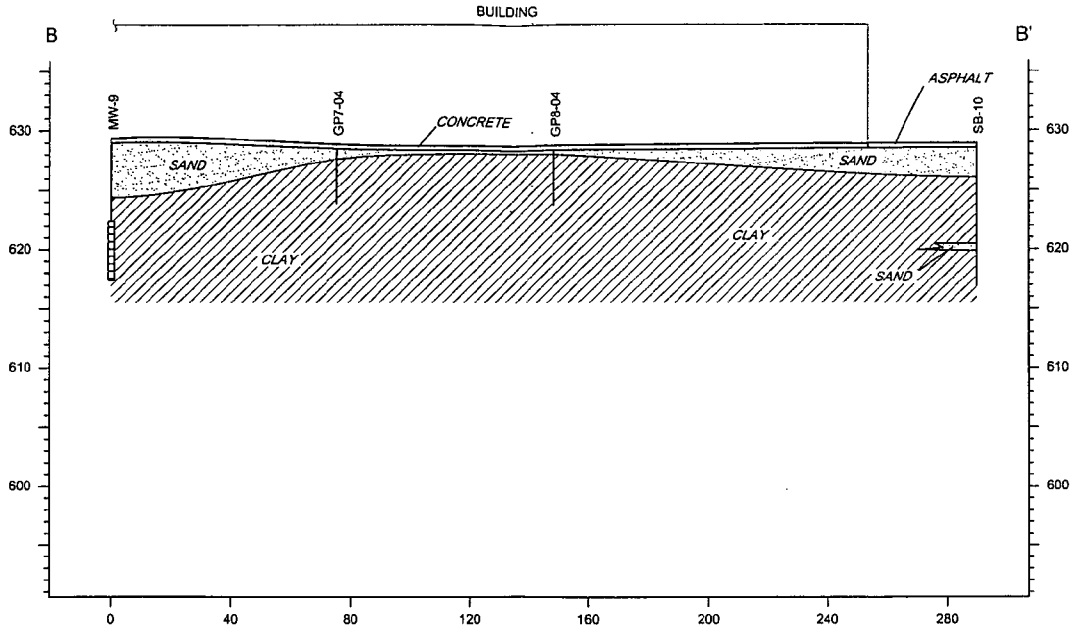
HORIZONTAL SCALE: 1"=40'
VERTICAL SCALE: 1"=10'

figure 4

A-A' CROSS SECTION
EAGLEPICHER - WOLVERINE GASKET
Inkster, Michigan

35298-00(002)GN-DE008 DEC 07/2005

MI0013178



HORIZONTAL SCALE: 1"=40'
VERTICAL SCALE: 1"=10'

LEGEND

SAND

CLAY

ASPHALT/CONCRETE

MWO-01 — WELL I.D.

WELL

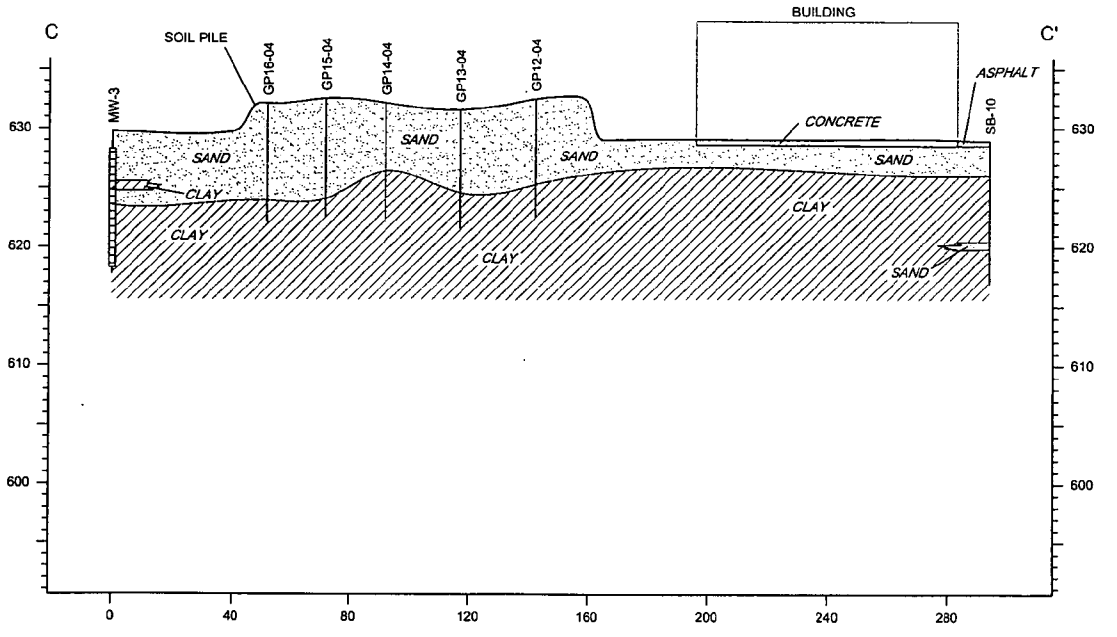
WELL SCREEN

figure 5

B-B' CROSS SECTION
EAGLEPICHER - WOLVERINE GASKET
Inkster, Michigan

35298-00(002)GN-DE010 DEC 07/2005

MI0013179



HORIZONTAL SCALE: 1"=40'
VERTICAL SCALE: 1"=10'

LEGEND

- SAND
- CLAY
- ASPHALT/CONCRETE

MW0-01 — WELL I.D.
WELL
WELL SCREEN

figure 6

C-C' CROSS SECTION
EAGLEPICHER - WOLVERINE GASKET
Inkster, Michigan

35298-00(002)GN-DE011 DEC 07/2005

MI0013180

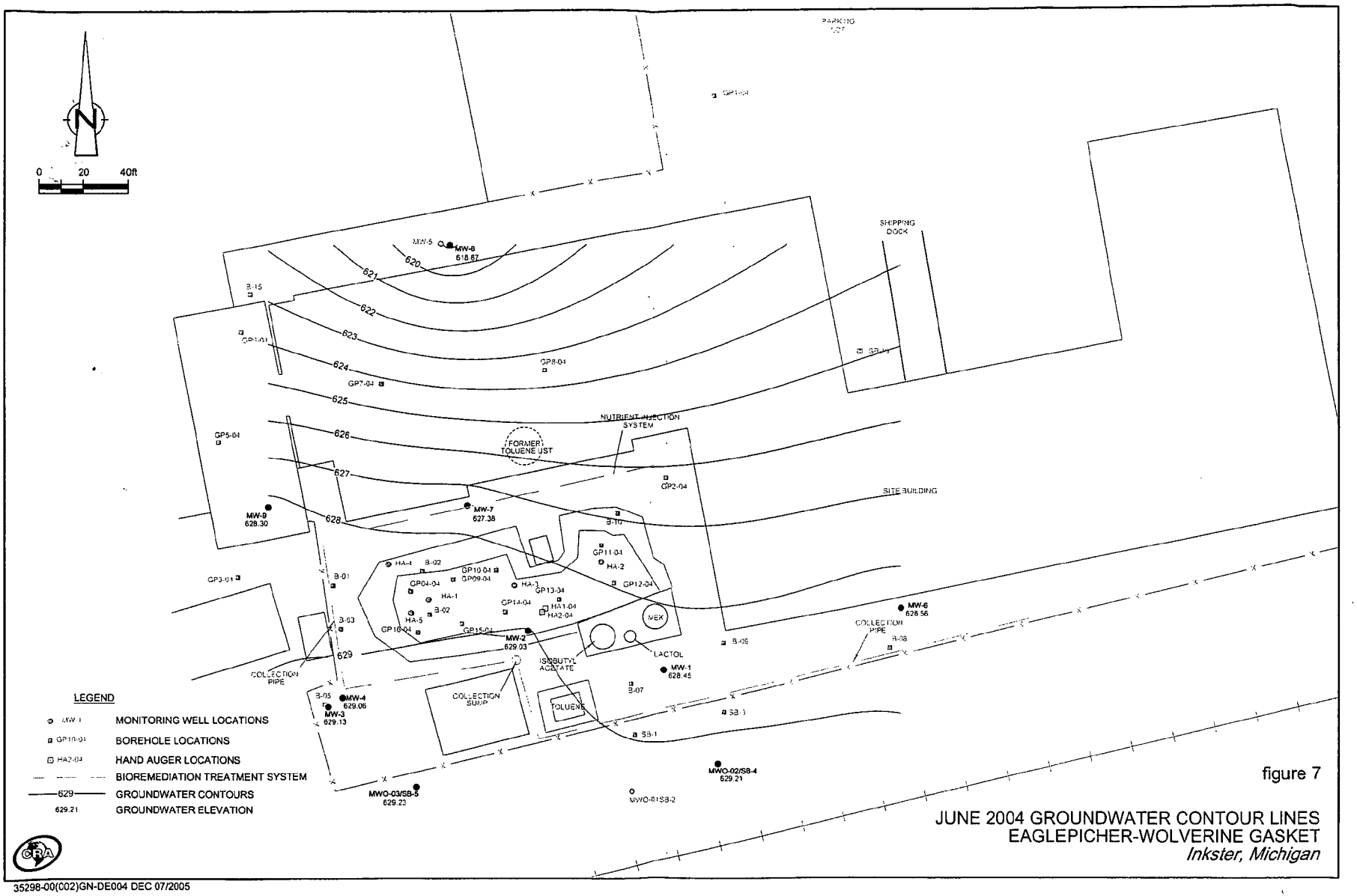
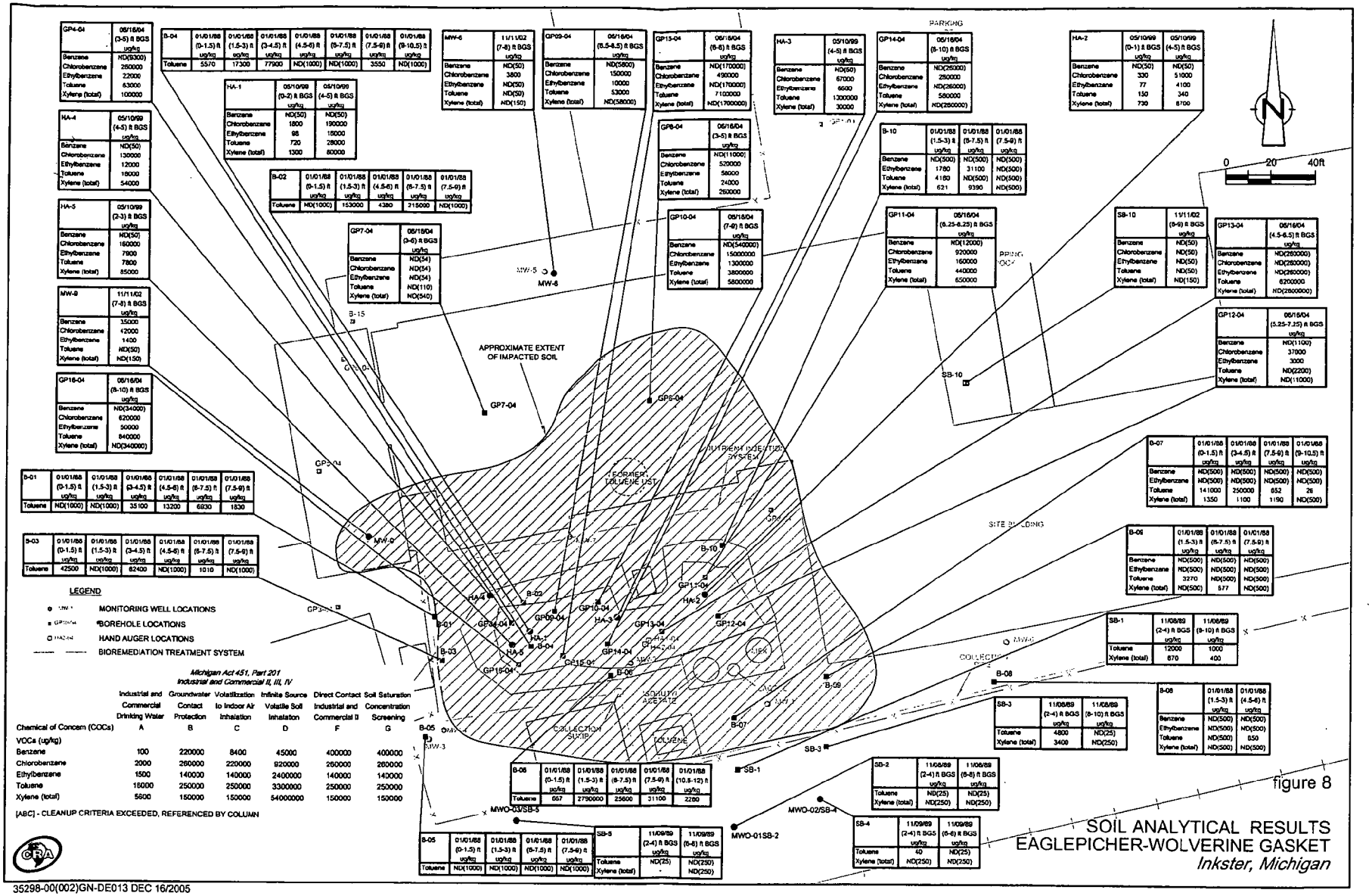


figure 7

JUNE 2004 GROUNDWATER CONTOUR LINES
EAGLEPICHER-WOLVERINE GASKET
Inkster, Michigan

35298-00(002)GN-DE004 DEC 07/2005

MI0013181



GP4-04	05/16/04 (3-5) ft BGS ug/kg
Benzene	ND(9300)
Chlorobenzene	260000
Ethylbenzene	22000
Toluene	63000
Xylene (total)	100000

B-04	01/01/88 (0-1.5) ft ug/kg	01/01/88 (1.5-3) ft ug/kg	01/01/88 (3-4.5) ft ug/kg	01/01/88 (4.5-6) ft ug/kg	01/01/88 (6-7.5) ft ug/kg	01/01/88 (7.5-9) ft ug/kg	01/01/88 (9-10.5) ft ug/kg
Toluene	5570	17300	77900	ND(1000)	ND(1000)	3550	ND(1000)

HA-1	05/10/99 (0-2) ft BGS ug/kg	05/10/99 (4-5) ft BGS ug/kg
Benzene	ND(50)	ND(50)
Chlorobenzene	1800	190000
Ethylbenzene	98	16000
Toluene	720	28000
Xylene (total)	1300	80000

HA-4	05/10/99 (4-5) ft BGS ug/kg
Benzene	ND(50)
Chlorobenzene	130000
Ethylbenzene	12000
Toluene	16000
Xylene (total)	54000

B-02	01/01/88 (0-1.5) ft ug/kg	01/01/88 (1.5-3) ft ug/kg	01/01/88 (4.5-6) ft ug/kg	01/01/88 (6-7.5) ft ug/kg	01/01/88 (7.5-9) ft ug/kg
Toluene	ND(1000)	153000	4380	215000	ND(1000)

HA-5	05/10/99 (2-3) ft BGS ug/kg
Benzene	ND(50)
Chlorobenzene	160000
Ethylbenzene	7900
Toluene	7800
Xylene (total)	85000

GP7-04	05/16/04 (3-6) ft BGS ug/kg
Benzene	ND(54)
Chlorobenzene	ND(54)
Ethylbenzene	ND(54)
Toluene	ND(110)
Xylene (total)	ND(540)

MW-9	11/11/02 (7-8) ft BGS ug/kg
Benzene	35000
Chlorobenzene	42000
Ethylbenzene	1400
Toluene	ND(50)
Xylene (total)	ND(150)

GP16-04	05/16/04 (8-10) ft BGS ug/kg
Benzene	ND(34000)
Chlorobenzene	620000
Ethylbenzene	50000
Toluene	840000
Xylene (total)	ND(340000)

B-01	01/01/88 (0-1.5) ft ug/kg	01/01/88 (1.5-3) ft ug/kg	01/01/88 (3-4.5) ft ug/kg	01/01/88 (4.5-6) ft ug/kg	01/01/88 (6-7.5) ft ug/kg	01/01/88 (7.5-9) ft ug/kg
Toluene	ND(1000)	ND(1000)	35100	13200	6930	1830

B-03	01/01/88 (0-1.5) ft ug/kg	01/01/88 (1.5-3) ft ug/kg	01/01/88 (3-4.5) ft ug/kg	01/01/88 (4.5-6) ft ug/kg	01/01/88 (6-7.5) ft ug/kg	01/01/88 (7.5-9) ft ug/kg
Toluene	42500	ND(1000)	82400	ND(1000)	1010	ND(1000)

MW-6	11/11/02 (7-8) ft BGS ug/kg
Benzene	ND(50)
Chlorobenzene	3800
Ethylbenzene	ND(50)
Toluene	ND(50)
Xylene (total)	ND(150)

GP03-04	05/16/04 (6.5-8.5) ft BGS ug/kg
Benzene	ND(5800)
Chlorobenzene	150000
Ethylbenzene	10000
Toluene	53000
Xylene (total)	ND(58000)

GP15-04	05/16/04 (6-8) ft BGS ug/kg
Benzene	ND(170000)
Chlorobenzene	490000
Ethylbenzene	ND(170000)
Toluene	7100000
Xylene (total)	ND(1700000)

GP8-04	05/16/04 (3-5) ft BGS ug/kg
Benzene	ND(11000)
Chlorobenzene	520000
Ethylbenzene	56000
Toluene	24000
Xylene (total)	260000

GP10-04	05/16/04 (7-9) ft BGS ug/kg
Benzene	ND(540000)
Chlorobenzene	15000000
Ethylbenzene	1300000
Toluene	3800000
Xylene (total)	5800000

HA-3	05/10/99 (4-5) ft BGS ug/kg
Benzene	ND(50)
Chlorobenzene	67000
Ethylbenzene	6600
Toluene	1300000
Xylene (total)	30000

GP14-04	05/16/04 (8-10) ft BGS ug/kg
Benzene	ND(25000)
Chlorobenzene	280000
Ethylbenzene	ND(25000)
Toluene	580000
Xylene (total)	ND(2500000)

B-10	01/01/88 (1.5-3) ft ug/kg	01/01/88 (6-7.5) ft ug/kg	01/01/88 (7.5-9) ft ug/kg
Benzene	ND(500)	ND(500)	ND(500)
Ethylbenzene	1780	31100	ND(500)
Toluene	4180	ND(500)	ND(500)
Xylene (total)	621	9390	ND(500)

GP11-04	05/16/04 (6.25-6.25) ft BGS ug/kg
Benzene	ND(12000)
Chlorobenzene	920000
Ethylbenzene	160000
Toluene	440000
Xylene (total)	650000

HA-2	05/10/99 (0-1) ft BGS ug/kg	05/10/99 (4-5) ft BGS ug/kg
Benzene	ND(50)	ND(50)
Chlorobenzene	330	5100
Ethylbenzene	77	4100
Toluene	150	340
Xylene (total)	730	8700

SB-10	11/11/02 (9-9) ft BGS ug/kg
Benzene	ND(50)
Chlorobenzene	ND(50)
Ethylbenzene	ND(50)
Toluene	ND(50)
Xylene (total)	ND(150)

GP13-04	05/16/04 (4.5-6.5) ft BGS ug/kg
Benzene	ND(260000)
Chlorobenzene	ND(260000)
Ethylbenzene	ND(260000)
Toluene	6200000
Xylene (total)	ND(2600000)

GP12-04	05/16/04 (5.25-7.25) ft BGS ug/kg
Benzene	ND(1100)
Chlorobenzene	37000
Ethylbenzene	3000
Toluene	ND(2200)
Xylene (total)	ND(11000)

B-07	01/01/88 (0-1.5) ft ug/kg	01/01/88 (3-4.5) ft ug/kg	01/01/88 (7.5-9) ft ug/kg	01/01/88 (9-10.5) ft ug/kg
Benzene	ND(500)	ND(500)	ND(500)	ND(500)
Ethylbenzene	ND(500)	ND(500)	ND(500)	ND(500)
Toluene	141000	250000	852	26
Xylene (total)	1350	1100	1190	ND(500)

B-06	01/01/88 (1.5-3) ft ug/kg	01/01/88 (6-7.5) ft ug/kg	01/01/88 (7.5-9) ft ug/kg
Benzene	ND(500)	ND(500)	ND(500)
Ethylbenzene	ND(500)	ND(500)	ND(500)
Toluene	3270	ND(500)	ND(500)
Xylene (total)	ND(500)	577	ND(500)

SB-1	11/08/89 (2-4) ft BGS ug/kg	11/08/89 (9-10) ft BGS ug/kg
Toluene	12000	1000
Xylene (total)	670	400

B-08	01/01/88 (1.5-3) ft ug/kg	01/01/88 (4.5-6) ft ug/kg
Benzene	ND(500)	ND(500)
Ethylbenzene	ND(500)	ND(500)
Toluene	ND(500)	850
Xylene (total)	ND(500)	ND(500)

SB-3	11/08/89 (2-4) ft BGS ug/kg	11/08/89 (9-10) ft BGS ug/kg
Toluene	4800	ND(25)
Xylene (total)	3400	ND(250)

B-09	01/01/88 (0-1.5) ft ug/kg	01/01/88 (1.5-3) ft ug/kg	01/01/88 (6-7.5) ft ug/kg	01/01/88 (7.5-9) ft ug/kg	01/01/88 (10.5-12) ft ug/kg
Toluene	667	2790000	25600	31100	2280

SB-2	11/08/89 (2-4) ft BGS ug/kg	11/08/89 (6-8) ft BGS ug/kg
Toluene	ND(25)	ND(25)
Xylene (total)	ND(250)	ND(250)

B-05	01/01/88 (0-1.5) ft ug/kg	01/01/88 (1.5-3) ft ug/kg	01/01/88 (6-7.5) ft ug/kg	01/01/88 (7.5-9) ft ug/kg
Toluene	ND(1000)	ND(1000)	ND(1000)	ND(1000)

SB-5	11/09/89 (2-4) ft BGS ug/kg	11/09/89 (6-8) ft BGS ug/kg
Toluene	ND(25)	ND(250)
Xylene (total)	-	ND(250)

SB-4	11/09/89 (2-4) ft BGS ug/kg	11/09/89 (6-8) ft BGS ug/kg
Toluene	40	ND(25)
Xylene (total)	ND(250)	ND(250)

Michigan Act 451, Part 201
Industrial and Commercial II, III, IV

Chemical of Concern (COCs)	Industrial and Commercial Drinking Water A	Groundwater Contact Protection B	Volatilization to Indoor Air Inhalation C	Infinite Source Volatile Soil Inhalation D	Direct Contact Industrial and Commercial II F	Soil Saturation Concentration Screening G
VOCs (ug/kg)						
Benzene	100	220000	8400	45000	400000	400000
Chlorobenzene	2000	260000	220000	920000	260000	260000
Ethylbenzene	1500	140000	140000	2400000	140000	140000
Toluene	16000	250000	250000	3300000	250000	250000
Xylene (total)	5600	150000	150000	54000000	150000	150000

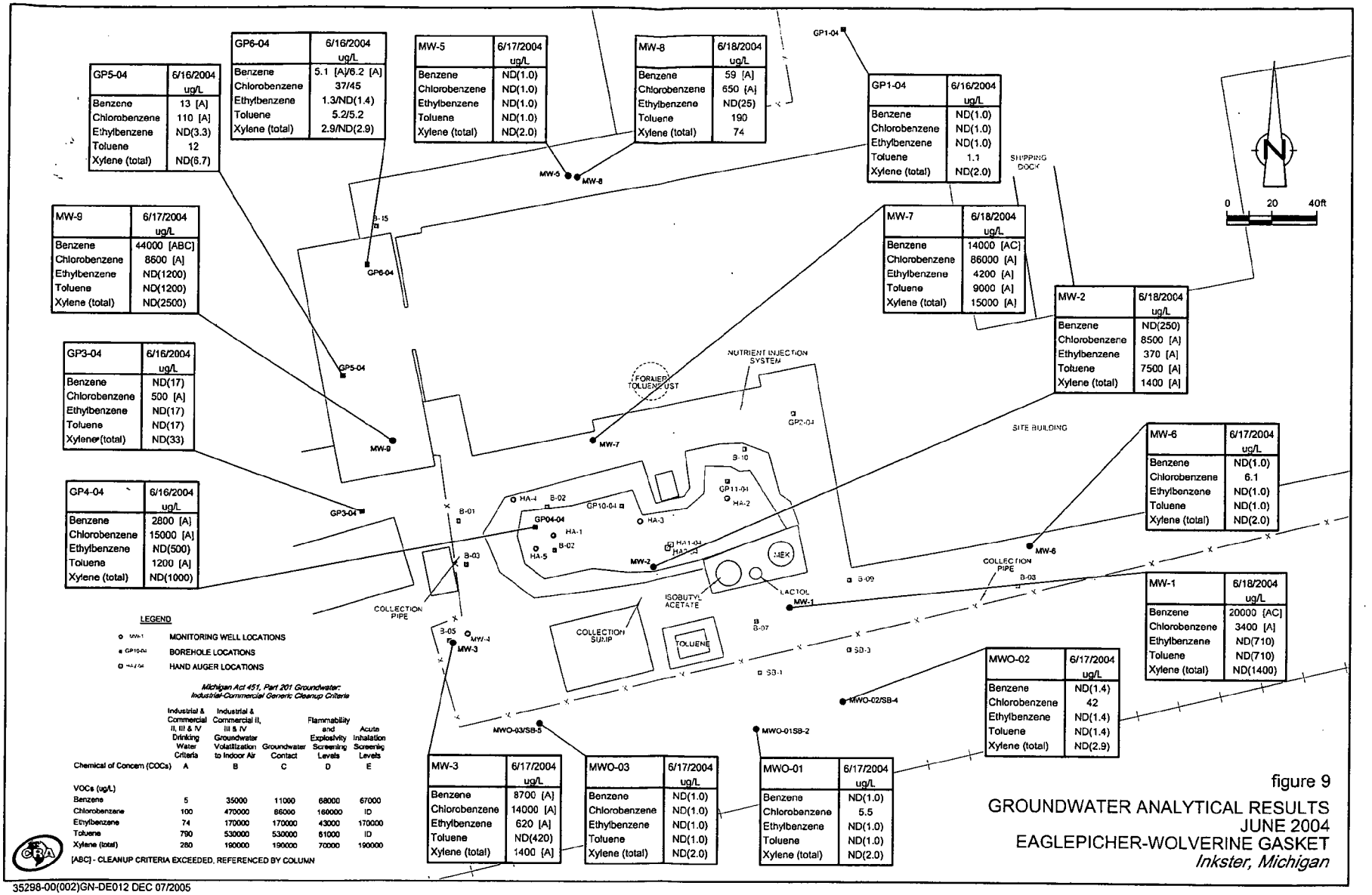
[ABC] - CLEANUP CRITERIA EXCEEDED, REFERENCED BY COLUMN

figure 8

SOIL ANALYTICAL RESULTS
EAGLEPICHER-WOLVERINE GASKET
Inkster, Michigan

35298-00(002)GN-DE013 DEC 16/2005

MI0013182



GP5-04	6/16/2004 ug/L
Benzene	13 [A]
Chlorobenzene	110 [A]
Ethylbenzene	ND(3.3)
Toluene	12
Xylene (total)	ND(6.7)

GP6-04	6/16/2004 ug/L
Benzene	5.1 [A]/6.2 [A]
Chlorobenzene	37/45
Ethylbenzene	1.3/ND(1.4)
Toluene	5.2/5.2
Xylene (total)	2.9/ND(2.9)

MW-5	6/17/2004 ug/L
Benzene	ND(1.0)
Chlorobenzene	ND(1.0)
Ethylbenzene	ND(1.0)
Toluene	ND(1.0)
Xylene (total)	ND(2.0)

MW-8	6/18/2004 ug/L
Benzene	59 [A]
Chlorobenzene	650 [A]
Ethylbenzene	ND(25)
Toluene	190
Xylene (total)	74

GP1-04	6/16/2004 ug/L
Benzene	ND(1.0)
Chlorobenzene	ND(1.0)
Ethylbenzene	ND(1.0)
Toluene	1.1
Xylene (total)	ND(2.0)

MW-9	6/17/2004 ug/L
Benzene	44000 [ABC]
Chlorobenzene	8600 [A]
Ethylbenzene	ND(1200)
Toluene	ND(1200)
Xylene (total)	ND(2500)

MW-7	6/18/2004 ug/L
Benzene	14000 [AC]
Chlorobenzene	86000 [A]
Ethylbenzene	4200 [A]
Toluene	9000 [A]
Xylene (total)	15000 [A]

MW-2	6/18/2004 ug/L
Benzene	ND(250)
Chlorobenzene	8500 [A]
Ethylbenzene	370 [A]
Toluene	7500 [A]
Xylene (total)	1400 [A]

GP3-04	6/16/2004 ug/L
Benzene	ND(17)
Chlorobenzene	500 [A]
Ethylbenzene	ND(17)
Toluene	ND(17)
Xylene (total)	ND(33)

GP4-04	6/16/2004 ug/L
Benzene	2800 [A]
Chlorobenzene	15000 [A]
Ethylbenzene	ND(500)
Toluene	1200 [A]
Xylene (total)	ND(1000)

MW-6	6/17/2004 ug/L
Benzene	ND(1.0)
Chlorobenzene	6.1
Ethylbenzene	ND(1.0)
Toluene	ND(1.0)
Xylene (total)	ND(2.0)

MW-1	6/18/2004 ug/L
Benzene	20000 [AC]
Chlorobenzene	3400 [A]
Ethylbenzene	ND(710)
Toluene	ND(710)
Xylene (total)	ND(1400)

MWO-02	6/17/2004 ug/L
Benzene	ND(1.4)
Chlorobenzene	42
Ethylbenzene	ND(1.4)
Toluene	ND(1.4)
Xylene (total)	ND(2.9)

MW-3	6/17/2004 ug/L
Benzene	8700 [A]
Chlorobenzene	14000 [A]
Ethylbenzene	620 [A]
Toluene	ND(420)
Xylene (total)	1400 [A]

MWO-03	6/17/2004 ug/L
Benzene	ND(1.0)
Chlorobenzene	ND(1.0)
Ethylbenzene	ND(1.0)
Toluene	ND(1.0)
Xylene (total)	ND(2.0)

MWO-01	6/17/2004 ug/L
Benzene	ND(1.0)
Chlorobenzene	5.5
Ethylbenzene	ND(1.0)
Toluene	ND(1.0)
Xylene (total)	ND(2.0)

figure 9

GROUNDWATER ANALYTICAL RESULTS
JUNE 2004
EAGLEPICHER-WOLVERINE GASKET
Inkster, Michigan

35298-00(002)GN-DE012 DEC 07/2005

MI0013183

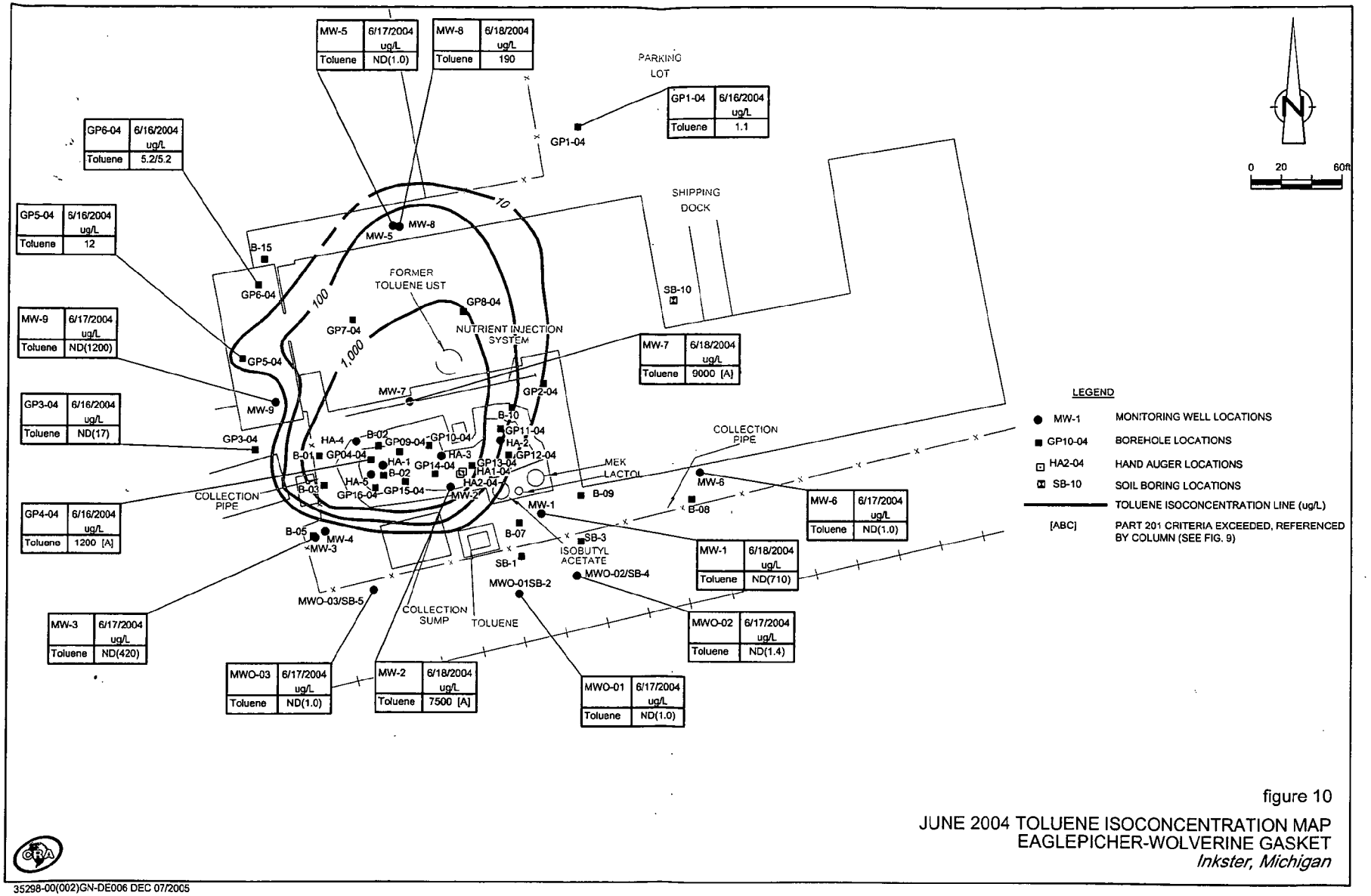


figure 10

JUNE 2004 TOLUENE ISOCONCENTRATION MAP
EAGLEPICHER-WOLVERINE GASKET
Inkster, Michigan

35298-00(002)GN-DE006 DEC 07/2005

MI0013184

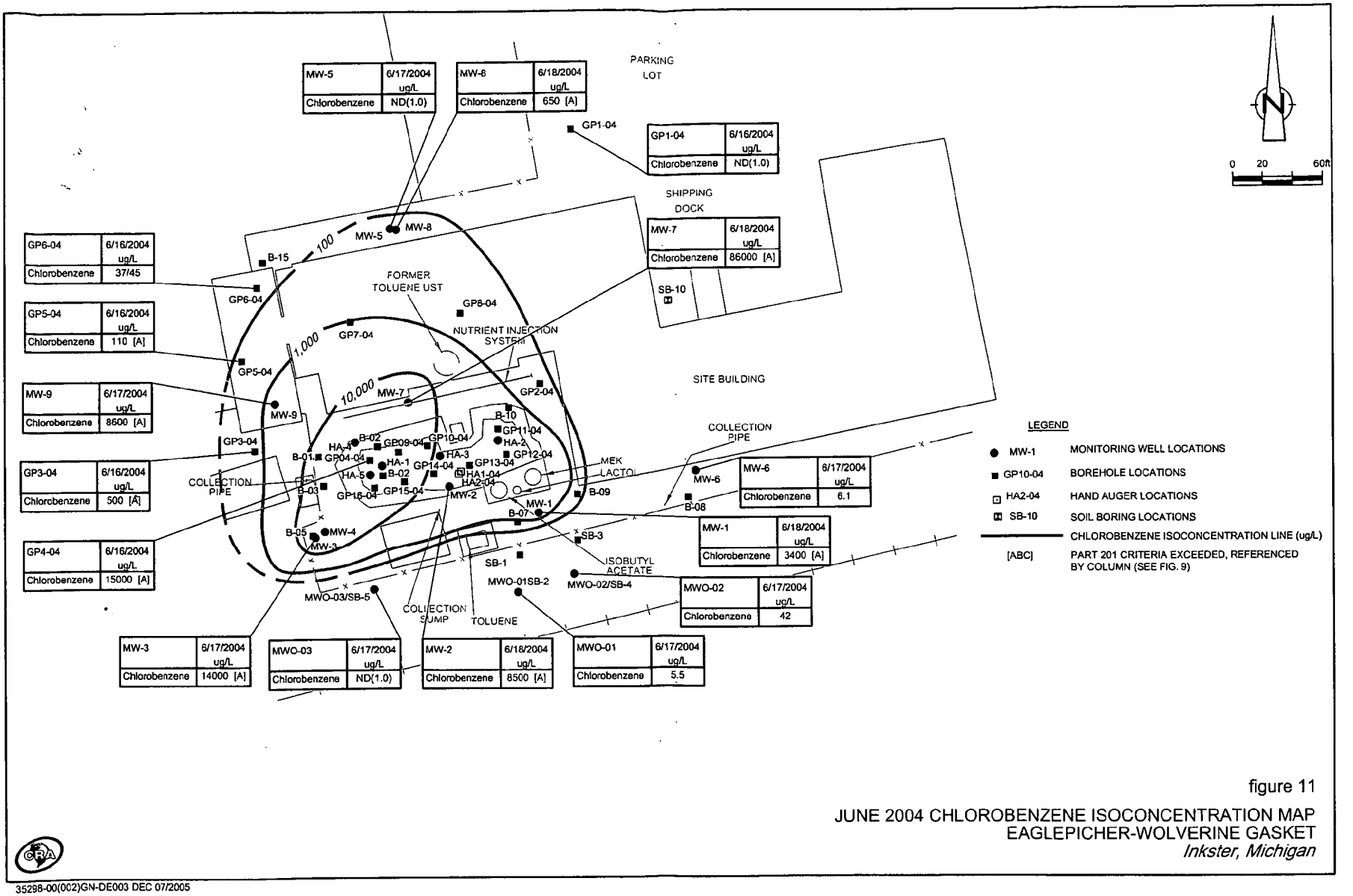


figure 11

JUNE 2004 CHLOROBENZENE ISOCONCENTRATION MAP
EAGLEPICHER-WOLVERINE GASKET
Inkster, Michigan

35298-00(002)GN-DE003 DEC 07/2005

MI0013185

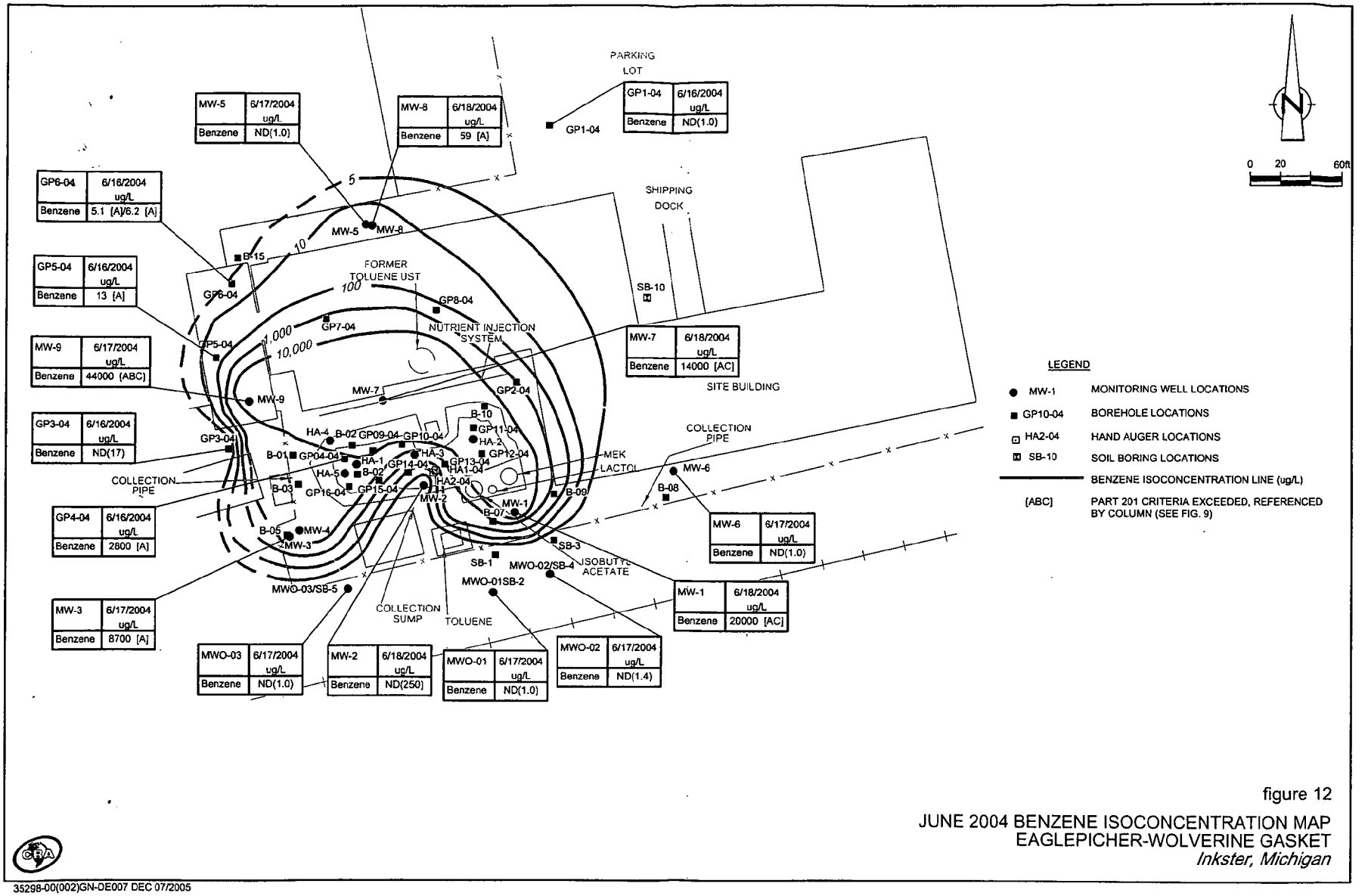


figure 12

JUNE 2004 BENZENE ISOCONCENTRATION MAP
EAGLEPICHER-WOLVERINE GASKET
Inkster, Michigan

35298-00(002)GN-DE007 DEC 07/2005

MI0013186

TABLE 2

SUMMARY OF JUNE 2004 SOIL RESULTS
WOLVERINE GASKET INKSTER FACILITY
INKSTER, MICHIGAN

Michigan Act 451, Part 201 Industrial and Commercial II, III, IV [1]

TCL VOC	Units	Industrial and Commercial Drinking Water Protection (a)	Groundwater Contact Protection (b)	Soil Volatilization to Indoor Air Inhalation (c)	Infinite Source Volatile Soil Inhalation (d)	Particulate Soil Inhalation (e)	Direct Contact Industrial and Commercial II (f)	Soil Saturation Concentration Screening (g)
1,1,1-Trichloroethane	ug/kg	4000	460000	460000	4500000	29000000000	460000	460000
1,1,2,2-Tetrachloroethane	ug/kg	700	94000	23000	34000	68000000	240000	870000
1,1,2-Trichloroethane	ug/kg	100	420000	24000	57000	250000000	840000	920000
1,1-Dichloroethane	ug/kg	50000	890000	430000	2500000	1500000000	890000	890000
1,1-Dichloroethene	ug/kg	140	220000	330	3700	78000000	570000	570000
1,2,4-Trichlorobenzene	ug/kg	4200	1100000	1100000	34000000	11000000000	1100000	1100000
1,2,4-Trimethylbenzene	ug/kg	2100	110000	110000	25000000	36000000000	110000	110000
1,2-Dibromo-3-chloropropane (DBCP)	ug/kg	4	1200	1200	15000	5900000	1200	1200
1,2-Dibromoethane (Ethylene Dibromide)	ug/kg	250	500	3600	5800	18000000	430	890000
1,2-Dichlorobenzene	ug/kg	14000	210000	210000	46000000	44000000000	210000	210000
1,2-Dichloroethane	ug/kg	100	380000	11000	21000	150000000	420000	1200000
1,2-Dichloropropane	ug/kg	100	320000	7400	30000	120000000	550000	550000
1,3-Dichlorobenzene	ug/kg	480	51000	ID	ID	ID	170000	170000
1,4-Dichlorobenzene	ug/kg	1700	140000	100000	260000	570000000	1900000	
2-Butanone (Methyl Ethyl Ketone)	ug/kg	760000	27000000	27000000	35000000	29000000000	27000000	27000000
2-Hexanone	ug/kg	58000	2500000	1800000	1300000	1200000000	2500000	2500000
4-Methyl-2-Pentanone (Methyl Isobutyl Ketone)	ug/kg	100000	2700000	2700000	53000000	60000000000	2700000	2700000
Acetone	ug/kg	42000	110000000	110000000	160000000	170000000000	73000000	110000000
Benzene	ug/kg	100	220000	8400	45000	470000000	400000	400000
Bromodichloromethane	ug/kg	2000	280000	6400	31000	110000000	490000	1500000
Bromoform	ug/kg	2000	870000	770000	3100000	3600000000	870000	870000
Bromomethane (Methyl Bromide)	ug/kg	580	1400000	1600	13000	150000000	1000000	2200000
Carbon disulfide	ug/kg	46000	280000	140000	1600000	21000000000	280000	280000
Carbon tetrachloride	ug/kg	100	92000	990	12000	170000000	390000	390000
Chlorobenzene	ug/kg	2000	260000	220000	920000	2100000000	260000	260000
Chloroethane	ug/kg	34000	950000	950000	36000000	29000000000	950000	950000
Chloroform (Trichloromethane)	ug/kg	2000	1500000	38000	150000	1600000000	1500000	1500000
Chloromethane (Methyl Chloride)	ug/kg	2200	1100000	10000	120000	2600000000	1100000	1100000
cis-1,2-Dichloroethene	ug/kg	1400	640000	41000	210000	1000000000	640000	640000
Cyclohexane	ug/kg	-	-	-	-	-	-	-
Dibromochloromethane	ug/kg	2000	360000	21000	80000	160000000	500000	610000
Dichlorodifluoromethane (CFC-12)	ug/kg	270000	1000000	1700000	65000000	1500000000000	1000000	1000000
Ethylbenzene	ug/kg	1500	140000	140000	2400000	13000000000	140000	140000
Isopropylbenzene	ug/kg	260000	390000	390000	2000000	2600000000	390000	390000
Methyl acetate	ug/kg	-	-	-	-	-	-	-
Methyl cyclohexane	ug/kg	-	-	-	-	-	-	-
Methyl Tert Butyl Ether	ug/kg	800	5900000	5900000	30000000	88000000000	5900000	5900000
Methylene chloride	ug/kg	100	2300000	240000	700000	8300000000	2300000	2300000
Styrene	ug/kg	2700	270000	520000	1300000	6900000000	520000	520000
Tetrachloroethene	ug/kg	100	88000	60000	600000	6800000000	88000	88000
Toluene	ug/kg	16000	250000	250000	3300000	12000000000	250000	250000
trans-1,2-Dichloroethene	ug/kg	2000	1400000	43000	330000	2100000000	1400000	1400000
Trichloroethene	ug/kg	100	440000	37000	260000	2300000000	500000	500000
Trichlorofluoromethane (CFC-11)	ug/kg	150000	560000	560000	110000000	170000000000	560000	560000
Trifluorotrichloroethane (Freon 113)	ug/kg	550000	550000	550000	210000000	2300000000000	550000	550000
Vinyl chloride	ug/kg	40	2000	2800	29000	890000000	34000	490000
Xylene (total)	ug/kg	5600	150000	150000	54000000	130000000000	150000	150000
1,3-Dichloropropene - Total	ug/kg	700	110000	5400	60000	590000000	240000	620000
cis-1,3-Dichloropropene	ug/kg	700	110000	5400	60000	590000000	240000	620000
trans-1,3-Dichloropropene	ug/kg	700	110000	5400	60000	590000000	240000	620000

Sample Location	GP4-04	GP7-04	GP8-04	GP09-04	GP10-04	GP11-04	GP12-04	GP13-04	GP14-04	GP15-04	GP16-04
Sample Identification	S-35298-061604-BF-010	S-35253-061604-BF-007	S-35298-061604-BF-008	S-35298-061604-BF-011	S-35298-061604-BF-012	S-35298-061604-BF-013	S-35298-061604-BF-014	S-35298-061604-BF-015	S-35298-061604-BF-016	S-35298-061604-BF-017	S-35298-061604-BF-018
Sample Date	6/16/2004	6/16/2004	6/16/2004	6/16/2004	6/16/2004	6/16/2004	6/16/2004	6/16/2004	6/15/2004	6/16/2004	6/16/2004
Sample Depth (ft BGS)	(3-5)	(3-5)	(3-5)	(6.5-8.5)	(7-9)	(6.25-8.25)	(5.25-7.25)	(4.5-6.5)	(8-10)	(6-8)	(8-10)
TCL VOC											
1,1,1-Trichloroethane	ND(9300)	ND(54)	ND(11000)	ND(5800)	ND(540000)	ND(12000)	ND(1100)	ND(260000)	ND(26000)	ND(170000)	ND(34000)
1,1,2,2-Tetrachloroethane	ND(19000)	ND(110)	ND(21000)	ND(12000)	ND(1100000)	ND(23000)	ND(2200)	ND(510000)	ND(53000)	ND(350000)	ND(67000)
1,1,2-Trichloroethane	ND(9300)	ND(54)	ND(11000)	ND(5800)	ND(540000)	ND(12000)	ND(1100)	ND(260000)	ND(26000)	ND(170000)	ND(34000)
1,1-Dichloroethane	ND(9300)	ND(54)	ND(11000)	ND(5800)	ND(540000)	ND(12000)	ND(1100)	ND(260000)	ND(26000)	ND(170000)	ND(34000)
1,1-Dichloroethene	ND(9300)	ND(54)	ND(11000)	ND(5800)	ND(540000)	ND(12000)	ND(1100)	ND(260000)	ND(26000)	ND(170000)	ND(34000)
1,2,4-Trichlorobenzene	ND(46000)	ND(270)	ND(53000)	ND(29000)	ND(2700000)	ND(59000)	ND(5400)	ND(1300000)	ND(130000)	ND(870000)	ND(170000)
1,2,4-Trimethylbenzene	ND(46000)	ND(270)	ND(53000)	ND(29000)	ND(2700000)	ND(59000)	ND(5400)	ND(1300000)	ND(130000)	ND(870000)	ND(170000)
1,2-Dibromo-3-chloropropane (DBCP)	ND(46000)	ND(270)	ND(53000)	ND(29000)	ND(2700000)	ND(59000)	ND(5400)	ND(1300000)	ND(130000)	ND(870000)	ND(170000)
1,2-Dibromoethane (Ethylene Dibromide)	ND(46000)	ND(270)	ND(53000)	ND(29000)	ND(2700000)	ND(59000)	ND(5400)	ND(1300000)	ND(130000)	ND(870000)	ND(170000)
1,2-Dichlorobenzene	ND(19000)	ND(110)	ND(21000)	ND(12000)	ND(1100000)	ND(23000)	ND(2200)	ND(510000)	ND(53000)	ND(350000)	ND(67000)
1,2-Dichloroethane	ND(9300)	ND(54)	ND(11000)	ND(5800)	ND(540000)	ND(12000)	ND(1100)	ND(260000)	ND(26000)	ND(170000)	ND(34000)
1,2-Dichloropropane	ND(9300)	ND(54)	ND(11000)	ND(5800)	ND(540000)	ND(12000)	ND(1100)	ND(260000)	ND(26000)	ND(170000)	ND(34000)
1,3-Dichlorobenzene	ND(19000)	ND(110)	ND(21000)	ND(12000)	ND(1100000)	ND(23000)	ND(2200)	ND(510000)	ND(53000)	ND(350000)	ND(67000)
1,4-Dichlorobenzene	ND(19000)	ND(110)	ND(21000)	ND(12000)	ND(1100000)	ND(23000)	ND(2200)	ND(510000)	ND(53000)	ND(350000)	ND(67000)
2-Butanone (Methyl Ethyl Ketone)	ND(140000)	ND(810)	ND(160000)	ND(86000)	ND(8100000)	ND(180000)	ND(16000)	ND(3800000)	ND(390000)	ND(2600000)	ND(500000)
2-Hexanone	ND(460000)	ND(2700)	ND(530000)	ND(290000)	ND(27000000)	ND(590000)	ND(54000)	ND(13000000)	ND(1300000)	ND(8700000)	ND(1700000)
4-Methyl-2-Pentanone (Methyl Isobutyl Ketone)	ND(460000)	ND(2700)	ND(530000)	ND(290000)	ND(27000000)	ND(590000)	ND(54000)	ND(13000000)	ND(1300000)	ND(8700000)	ND(1700000)
Acetone	ND(140000)	ND(810)	ND(160000)	ND(86000)	ND(8100000)	ND(180000)	ND(16000)	ND(3800000)	ND(390000)	ND(2600000)	ND(500000)
Benzene	ND(9300)	ND(54)	ND(11000)	ND(5800)	ND(540000)	ND(12000)	ND(1100)	ND(260000)	ND(26000)	ND(170000)	ND(34000)
Bromodichloromethane	ND(19000)	ND(110)	ND(21000)	ND(12000)	ND(1100000)	ND(23000)	ND(2200)	ND(510000)	ND(53000)	ND(350000)	ND(67000)
Bromoform	ND(19000)	ND(110)	ND(21000)	ND(12000)	ND(1100000)	ND(23000)	ND(2200)	ND(510000)	ND(53000)	ND(350000)	ND(67000)
Bromomethane (Methyl Bromide)	ND(46000)	ND(270)	ND(53000)	ND(29000)	ND(2700000)	ND(59000)	ND(5400)	ND(1300000)	ND(130000)	ND(870000)	ND(170000)
Carbon disulfide	ND(46000)	ND(270)	ND(53000)	ND(29000)	ND(2700000)	ND(59000)	ND(5400)	ND(1300000)	ND(130000)	ND(870000)	ND(170000)
Carbon tetrachloride	ND(9300)	ND(54)	ND(11000)	ND(5800)	ND(540000)	ND(12000)	ND(1100)	ND(260000)	ND(26000)	ND(170000)	ND(34000)
Chlorobenzene	**260000** [a,d]	ND(54)	**520000** [a,b,c,f,g]	**150000** [a]	**15000000** [a,b,c,d,f,g]	**920000** [a,b,c,f,g]	**37000** [a]	ND(260000)	**280000** [a,b,c,f,g]	**490000** [a,b,c,f,g]	**610000** [a,b,c,f,g]
Chloroethane	ND(46000)	ND(270)	ND(53000)	ND(29000)	ND(2700000)	ND(59000)	ND(5400)	ND(1300000)	ND(130000)	ND(870000)	ND(170000)
Chloroform (Trichloromethane)	ND(9300)	ND(54)	ND(11000)	ND(5800)	ND(540000)	ND(12000)	ND(1100)	ND(260000)	ND(26000)	ND(170000)	ND(34000)
Chloromethane (Methyl Chloride)	ND(46000)	ND(270)	ND(53000)	ND(29000)	ND(2700000)	ND(59000)	ND(5400)	ND(1300000)	ND(130000)	ND(870000)	ND(170000)
cis-1,2-Dichloroethene	ND(9300)	ND(54)	ND(11000)	ND(5800)	ND(540000)	ND(12000)	ND(1100)	ND(260000)	ND(26000)	ND(170000)	ND(34000)
Cyclohexane	ND(220000)	ND(1300)	ND(250000)	ND(140000)	ND(13000000)	ND(280000)	ND(26000)	ND(6200000)	ND(630000)	ND(4200000)	ND(800000)
Dibromochloromethane	ND(9300)	ND(54)	ND(11000)	ND(5800)	ND(540000)	ND(12000)	ND(1100)	ND(260000)	ND(26000)	ND(170000)	ND(34000)
Dichlorodifluoromethane (CFC-12)	ND(19000)	ND(110)	ND(21000)	ND(12000)	ND(1100000)	ND(23000)	ND(2200)	ND(510000)	ND(53000)	ND(350000)	ND(67000)
Ethylbenzene	**22000** [a]	ND(54)	**58000** [a]	**10000** [a]	**1300000** [a,b,c,f,g]	**160000** [a,b,c,f,g]	**3000** [a]	ND(260000)	ND(26000)	ND(170000)	**50000** [a]
Isopropylbenzene	ND(46000)	ND(270)	ND(53000)	ND(29000)	ND(2700000)	ND(59000)	ND(5400)	ND(1300000)	ND(130000)	ND(870000)	ND(170000)
Methyl acetate	ND(220000)	ND(1300)	ND(250000)	ND(140000)	ND(13000000)	ND(280000)	ND(26000)	ND(6200000)	ND(630000)	ND(4200000)	ND(800000)
Methyl cyclohexane	ND(220000)	ND(1300)	ND(250000)	ND(140000)	ND(13000000)	ND(280000)	ND(26000)	ND(6200000)	ND(630000)	ND(4200000)	ND(800000)
Methyl Tert Butyl Ether	ND(46000)	ND(270)	ND(53000)	ND(29000)	ND(2700000)	ND(59000)	ND(5400)	ND(1300000)	ND(130000)	ND(870000)	ND(170000)
Methylene chloride	ND(46000)	ND(270)	ND(53000)	ND(29000)	ND(2700000)	ND(59000)	ND(5400)	ND(1300000)	ND(130000)	ND(870000)	ND(170000)
Styrene	ND(9300)	ND(54)	ND(11000)	ND(5800)	ND(540000)	ND(12000)	ND(1100)	ND(260000)	ND(26000)	ND(170000)	ND(34000)
Tetrachloroethene	ND(9300)	ND(54)	ND(11000)	ND(5800)	ND(540000)	ND(12000)	ND(1100)	ND(260000)	ND(26000)	ND(170000)	ND(34000)
Toluene	**63000** [a]	ND(110)	**24000** [a]	**53000** [a]	**3800000** [a,b,c,f,g]	**440000** [a,b,c,f,g]	ND(2200)	**6200000** [a,b,c,f,g]	**580000** [a,b,c,f,g]	**7100000** [a,b,c,f,g]	**840000** [a,b,c,f,g]
trans-1,2-Dichloroethene	ND(9300)	ND(54)	ND(11000)	ND(5800)	ND(540000)	ND(12000)	ND(1100)	ND(260000)	ND(26000)	ND(170000)	ND(34000)
Trichloroethene	ND(9300)	ND(54)	ND(11000)	ND(5800)	ND(540000)	ND(12000)	ND(1100)	ND(260000)	ND(26000)	ND(170000)	ND(34000)
Trichlorofluoromethane (CFC-11)	ND(19000)	ND(110)	ND(21000)	ND(12000)	ND(1100000)	ND(23000)	ND(2200)	ND(510000)	ND(53000)	ND(350000)	ND(67000)
Trifluorotrichloroethane (Freon 113)	ND(46000)	ND(270)	ND(53000)	ND(29000)	ND(2700000)	ND(59000)	ND(5400)	ND(1300000)	ND(130000)	ND(870000)	ND(170000)
Vinyl chloride	ND(19000)	ND(110)	ND(21000)	ND(12000)	ND(1100000)	ND(23000)	ND(2200)	ND(510000)	ND(53000)	ND(350000)	ND(67000)
Xylene (total)	**100000** [a]	ND(540)	**240000** [a,b,c,f,g]	ND(58000)	**5800000** [a,b,c,f,g]	**650000** [a,b,c,f,g]	ND(11000)	ND(2600000)	ND(260000)	ND(1700000)	ND(340000)
1,3-Dichloropropene - Total	-	-	-	-	-	-	-	-	-	-	-
cis-1,3-Dichloropropene	ND(9300)	ND(54)	ND(11000)	ND(5800)	ND(540000)	ND(12000)	ND(1100)	ND(260000)	ND(26000)	ND(170000)	ND(34000)
trans-1,3-Dichloropropene	ND(9300)	ND(54)	ND(11000)	ND(5800)	ND(540000)	ND(12000)	ND(1100)	ND(260000)	ND(26000)	ND(170000)	ND(34000)

Notes:
- Cleanup criteria established in Part (7) of administrative rules promulgated December 13, 2002, pursuant to Part 201, Environmental Remediation, 1994 PA 451 as amended

1000[a] (boxed) Exceeds Part 201 Generic Criteria, referenced by column.

ND( ) - Not detected above the value in parenthesis.

– No criteria or not analyzed.

TABLE 3

SUMMARY OF HISTORICAL SOIL RESULTS
EAGLEPICHER AUTOMOTIVE
WOLVERINE GASKET
INKSTER, MICHIGAN

Sample Location		Michigan Act 451, Part 201 Industrial and Commercial II, III, IV [a]																																
Sample Identification		Industrial and Commercial Drinking Water Protection	Groundwater Contact Protection	Soil Volatilization to Indoor Air Inhalation	Infinite Source Volatile Soil Inhalation	Particulate Soil Inhalation	Direct Contact Industrial and Commercial II	Soil Saturation Concentration Screening	B-01	B-01	B-01	B-01	B-01	B-01	B-02	B-02	B-02	B-02	B-02	B-02	B-03	B-03	B-03	B-03	B-03	B-03	B-04	B-04	B-04	B-04	B-04	B-04	B-04	B-05	B-05	B-05
Sample Date									1/1/1988	1/1/1988	1/1/1988	1/1/1988	1/1/1988	1/1/1988	1/1/1988	1/1/1988	1/1/1988	1/1/1988	1/1/1988	1/1/1988	1/1/1988	1/1/1988	1/1/1988	1/1/1988	1/1/1988	1/1/1988	1/1/1988	1/1/1988	1/1/1988	1/1/1988	1/1/1988	1/1/1988	1/1/1988	1/1/1988	1/1/1988
Sample Depth (ft BGS)	Units	a	b	c	d	e	f	g	(0-1.5)	(1.5-3)	(3-4.5)	(4.5-6)	(6-7.5)	(7.5-9)	(0-1.5)	(1.5-3)	(4.5-6)	(6-7.5)	(7.5-9)	(0-1.5)	(1.5-3)	(3-4.5)	(4.5-6)	(6-7.5)	(7.5-9)	(0-1.5)	(1.5-3)	(3-4.5)	(4.5-6)	(6-7.5)	(7.5-9)	(9-10.5)	(0-1.5)	(1.5-3)	(6-7.5)
VOCs																																				
1,1-Dichloroethane	ug/kg	50000	890000	430000	2500000	15000000000	890000	890000	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–
Benzene	ug/kg	100	220000	8400	49000	470000000	400000	400000	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–
Chlorobenzene	ug/kg	2000	360000	220000	930000	2100000000	360000	360000	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–
Ethylbenzene	ug/kg	1500	140000	140000	2400000	13000000000	140000	140000	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–
Isobutyl acetate	ug/kg	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–
Toluene	ug/kg	16000	250000	250000	3300000	12000000000	250000	250000	ND(1000)	ND(1000)	35100[a]	12200	6930	1830	ND(1000)	353000[a]	4380	215000[a]	ND(1000)	42500[a]	ND(1000)	82400[a]	ND(1000)	1010	ND(1000)	5570	17300[a]	77900[a]	ND(1000)	ND(1000)	3550	ND(1000)	ND(1000)	ND(1000)	ND(1000)
Xylene (total)	ug/kg	5600	150000	150000	54000000	130000000000	150000	150000	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–

Sample Location		B-05	B-06	B-06	B-06	B-06	B-06	B-07	B-07	B-07	B-07	B-08	B-08	B-09	B-09	B-09	B-10	B-10	B-10	HA-1	HA-1	HA-2	HA-2	HA-3	HA-4	HA-5	MW-8	MW-9	SB-1	SB-1	SB-2	SB-2	SB-3	SB-3	SB-4	SB-4	SB-5	SB-5	SB-10
Sample Identification		B-05	B-06	B-06	B-06	B-06	B-06	B-07	B-07	B-07	B-07	B-08	B-08	B-09	B-09	B-09	B-10	B-10	B-10	HA-1	HA-1	HA-2	HA-2	HA-3	HA-4	HA-5	MW-8	MW-9	SB-1	SB-1	SB-2	SB-2	SB-3	SB-3	SB-4	SB-4	SB-5	SB-5	SB-10
Sample Date		1/1/1988	1/1/1988	1/1/1988	1/1/1988	1/1/1988	1/1/1988	1/1/1988	1/1/1988	1/1/1988	1/1/1988	1/1/1988	1/1/1988	1/1/1988	1/1/1988	1/1/1988	1/1/1988	1/1/1988	1/1/1988	5/10/1999	5/10/1999	5/10/1999	5/10/1999	5/10/1999	5/10/1999	5/10/1999	11/11/2002	11/11/2002	11/8/1989	11/8/1989	11/8/1989	11/8/1989	11/8/1989	11/8/1989	11/9/1989	11/9/1989	11/9/1989	11/9/1989	11/11/2002
Sample Depth (ft BGS)	Units	(7.5-9)	(0-1.5)	(1.5-3)	(10.5-12)	(6-7.5)	(7.5-9)	(0-1.5)	(3-4.5)	(7.5-9)	(9-10.5)	(1.5-3)	(4.5-6)	(1.5-3)	(6-7.5)	(7.5-9)	(1.5-3)	(6-7.5)	(7.5-9)	(0-2)	(4-5)	(0-1)	(4-5)	(4-5)	(4-5)	(2-3)	(7-8)	(7-8)	(2-4)	(8-10)	(2-4)	(6-8)	(2-4)	(8-10)	(2-4)	(6-8)	(2-4)	(6-8)	(8-9)
VOCs																																							
1,1-Dichloroethane	ug/kg	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	91	ND(50)	–	–	–	–	–	–	–	–	–	–	ND(50)
Benzene	ug/kg	–	–	–	–	–	–	ND(500)	ND(500)	ND(500)	ND(500)	ND(500)	ND(500)	ND(500)	ND(500)	ND(500)	ND(500)	ND(500)	ND(500)	ND(50)	ND(50)	ND(50)	ND(50)	ND(50)	ND(50)	ND(50)	ND(50)	35000[a]	–	–	–	–	–	–	–	–	–	–	ND(50)
Chlorobenzene	ug/kg	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	1800	190000[a]	330	51000[a]	67800[a]	130000[a]	160000[a]	3600[a]	42000[a]	–	–	–	–	–	–	–	–	–	–	ND(50)
Ethylbenzene	ug/kg	–	–	–	–	–	–	ND(500)	ND(500)	ND(500)	ND(500)	ND(500)	ND(500)	ND(500)	ND(500)	ND(500)	1780[a]	31100[a]	ND(500)	98	16000[a]	77	4100[a]	6600[a]	12000[a]	7900[a]	ND(50)	1400	–	–	–	–	–	–	–	–	–	–	ND(50)
Isobutyl acetate	ug/kg	–	–	–	–	–	–	ND(500)	ND(500)	ND(500)	ND(500)	ND(500)	ND(500)	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–
Toluene	ug/kg	ND(1000)	667	2790000[a]	2280	25600[a]	31100[a]	141000[a]	250000[a]	652	26	ND(500)	850	3270	ND(500)	ND(500)	4180	ND(500)	ND(500)	720	28000[a]	150	340	1300000[a]	18000[a]	7800	ND(50)	ND(50)	12000	1000	ND(25)	ND(25)	4800	ND(25)	40	ND(25)	ND(25)	ND(250)	ND(50)
Xylene (total)	ug/kg	–	–	–	–	–	–	1350	1100	1190	ND(500)	ND(500)	ND(500)	ND(500)	677	ND(500)	621	9390[a]	ND(500)	1300	80000[a]	730	8700[a]	30000[a]	54000[a]	85000[a]	ND(150)	ND(150)	670	400	ND(250)	ND(250)	3400	ND(250)	ND(250)	ND(250)	–	ND(250)	ND(150)

Notes:
- Cleanup criteria established in Part (7) of administrative rules promulgated December 13, 2002, pursuant to Part 201, Environmental Remediation, 1994 PA 451 as amended
[a] Exceeds Part 201 Generic Criteria, referenced by column.
ND ( ) – Not detected above the value in parenthesis.
– No criteria or not analyzed.

CRA 3529Summ4-T3D

MI0013188

TABLE 4

SUMMARY OF JUNE 2004 GROUNDWATER RESULTS
WOLVERINE GASKET INKSTER FACILITY
INKSTER, MICHIGAN

Sample Location		Michigan Act 451, Part 201 Groundwater Residential and Industrial-Commercial Generic Cleanup Criteria[a]					GP1-04	GP3-04	GP4-04	GP5-04	GP6-04	GP6-04	MW-1	MW-2	MW-3	MW-5	MW-6	MW-7
Sample Identification		Industrial & Commercial II, II, IV	Industrial & Commercial II, II & IV Groundwater	Groundwater Contact	Flammability and Explosivity	Acute Inhalation	GW-35298-061604-DF-001	GW-35298-061604-DF-002	GW-35298-061604-DF-003	GW-35298-061604-DF-004	GW-35298-061604-DF-005	GW-35298-061604-DF-006	GW-35298-061704-DF-029	GW-35298-061704-DF-032	GW-35298-061704-DF-021	GW-35298-061704-DF-027	GW-35298-061704-DF-023	GW-35298-061704-DF-033
Sample Date		Drinking Water	Volatilization to Indoor Air Inhalation		Screening Levels	Screening Levels	6/16/2004	6/16/2004	6/16/2004	6/16/2004	6/16/2004	6/16/2004 Duplicate	6/18/2004	6/18/2004	6/17/2004	6/17/2004	6/17/2004	6/18/2004
Sample Type	Units	a	b	c	d	e												
TCL VOCs																		
1,1,1-Trichloroethane	ug/L	200	1300000	1300000	ID	1300000	ND(1.0)	ND(17)	ND(500)	ND(3.3)	ND(1.0)	ND(1.4)	ND(710)	ND(250)	ND(420)	ND(1.0)	ND(1.0)	ND(3000)
1,1,2,2-Tetrachloroethane	ug/L	35	77000	4700	ID	ID	ND(1.0)	ND(17)	ND(500)	ND(3.3)	ND(1.0)	ND(1.4)	ND(710)	ND(250)	ND(420)	ND(1.0)	ND(1.0)	ND(3000)
1,1,2-Trichloroethane	ug/L	5	110000	21000		ID	ND(1.0)	ND(17)	ND(500)	ND(3.3)	ND(1.0)	ND(1.4)	ND(710)	ND(250)	ND(420)	ND(1.0)	ND(1.0)	ND(3000)
1,1-Dichloroethane	ug/L	2500	2300000	2400000	380000	ID	ND(1.0)	ND(17)	ND(500)	ND(3.3)	ND(1.0)	ND(1.4)	ND(710)	ND(250)	ND(420)	ND(1.0)	ND(1.0)	ND(3000)
1,1-Dichloroethene	ug/L	7	1300	11000	97000	140000	ND(1.0)	ND(17)	ND(500)	ND(3.3)	ND(1.0)	ND(1.4)	ND(710)	ND(250)	ND(420)	ND(1.0)	ND(1.0)	ND(3000)
1,2,4-Trichlorobenzene	ug/L	70	300000	19000		300000	ND(5.0)	ND(83)	ND(2500)	ND(17)	ND(5.0)	ND(7.2)	ND(3600)	ND(1200)	ND(2100)	ND(5.0)	ND(5.0)	ND(17000)
1,2,4-Trimethylbenzene	ug/L	63	56000	56000	56000	ID	ND(1.0)	ND(17)	ND(500)	ND(3.3)	ND(1.0)	ND(1.4)	ND(710)	ND(250)	ND(420)	ND(1.0)	ND(1.0)	ND(3000)
1,2-Dibromo-3-chloropropane (DBCP)	ug/L	0.2	1200	390		ID	ND(1.0)	ND(17)	ND(500)	ND(3.3)	ND(1.0)	ND(1.4)	ND(710)	ND(250)	ND(420)	ND(1.0)	ND(1.0)	ND(3000)
1,2-Dibromoethane (Ethylene Dibromide)	ug/L	1	19000	25	ID	ID	ND(1.0)	ND(17)	ND(500)	ND(3.3)	ND(1.0)	ND(1.4)	ND(710)	ND(250)	ND(420)	ND(1.0)	ND(1.0)	ND(3000)
1,2-Dichlorobenzene	ug/L	600	140000	140000		140000	ND(1.0)	ND(17)	ND(500)	ND(3.3)	ND(1.0)	ND(1.4)	ND(710)	ND(250)	ND(420)	ND(1.0)	ND(1.0)	ND(3000)
1,2-Dichloroethane	ug/L	5	59000	19000	2500000	ID	ND(1.0)	ND(17)	ND(500)	ND(3.3)	ND(1.0)	ND(1.4)	ND(710)	ND(250)	ND(420)	ND(1.0)	ND(1.0)	ND(3000)
1,2-Dichloropropane	ug/L	5	36000	16000	550000	2800000	ND(1.0)	ND(17)	ND(500)	ND(3.3)	ND(1.0)	ND(1.4)	ND(710)	ND(250)	ND(420)	ND(1.0)	ND(1.0)	ND(3000)
1,3-Dichlorobenzene	ug/L	19	ID	2000	ID	ID	ND(1.0)	ND(17)	ND(500)	ND(3.3)	ND(1.0)	ND(1.4)	ND(710)	ND(250)	ND(420)	ND(1.0)	ND(1.0)	ND(3000)
1,4-Dichlorobenzene	ug/L	75	79000	6400		ID	ND(1.0)	ND(17)	ND(500)	ND(3.3)	ND(1.0)	ND(1.4)	ND(710)	ND(250)	ND(420)	ND(1.0)	ND(1.0)	ND(3000)
2-Butanone (Methyl Ethyl Ketone)	ug/L	38000	2400000000	2400000000	ID	2400000000	ND(25)	ND(420)	ND(13000)	ND(83)	ND(75)	ND(94)	ND(18000)	ND(6200)	ND(10500)	ND(50)	ND(50)	ND(80000)
2-Hexanone	ug/L	2900	8700000	5200000		ID	ND(50)	ND(830)	ND(25000)	ND(170)	ND(50)	ND(72)	ND(36000)	ND(12000)	ND(21000)	ND(50)	ND(50)	ND(170000)
4-Methyl-2-Pentanone (Methyl Isobutyl Ketone)	ug/L	5200	20000000	13000000	ID	20000000	ND(50)	ND(830)	ND(25000)	ND(170)	ND(50)	ND(72)	ND(36000)	ND(12000)	ND(21000)	ND(50)	ND(50)	ND(170000)
Acetone	ug/L	2100	1000000000	310000000	150000000	1000000000	ND(25)	ND(420)	ND(12000)	ND(83)	ND(25)	ND(36)	ND(18000)	ND(6200)	ND(10000)	ND(25)	ND(25)	ND(80000)
Benzene	ug/L	5	38000	11000	68000	67000	ND(1.0)	ND(17)	2800*	13*	5.1*	6.2*	20000**	ND(250)	8700*	ND(1.0)	ND(1.0)	14000**
Bromodichloromethane	ug/L	100	37000	14000	ID	ID	ND(1.0)	ND(17)	ND(500)	ND(3.3)	ND(1.0)	ND(1.4)	ND(710)	ND(250)	ND(420)	ND(1.0)	ND(1.0)	ND(3000)
Bromoform	ug/L	100	3180000	140000	ID	ID	ND(1.0)	ND(17)	ND(500)	ND(3.3)	ND(1.0)	ND(1.4)	ND(710)	ND(250)	ND(420)	ND(1.0)	ND(1.0)	ND(3000)
Bromomethane (Methyl Bromide)	ug/L	29	9100	70000	ID	ID	ND(1.0)	ND(17)	ND(500)	ND(3.3)	ND(1.0)	ND(1.4)	ND(710)	ND(250)	ND(420)	ND(1.0)	ND(1.0)	ND(3000)
Carbon disulfide	ug/L	2300	550000	1200000	13000	ID	ND(5.0)	ND(83)	ND(2500)	ND(17)	ND(5.0)	ND(7.2)	ND(3600)	ND(1200)	ND(2100)	ND(5.0)	ND(5.0)	ND(17000)
Carbon tetrachloride	ug/L	5	2600	4600	ID	96000	ND(1.0)	ND(17)	ND(500)	ND(3.3)	ND(1.0)	ND(1.4)	ND(710)	ND(250)	ND(420)	ND(1.0)	ND(1.0)	ND(3000)
Chlorobenzene	ug/L	100	470000	86000	1600000	ID	ND(1.0)	500*	15000*	110*	37	45	3400*	8500*	14000*	ND(1.0)	6.1	86000*
Chloroethane	ug/L	1700	5700000	440000	1100000	ID	ND(1.0)	ND(17)	ND(500)	ND(3.3)	ND(1.0)	ND(1.4)	ND(710)	ND(250)	ND(420)	ND(1.0)	ND(1.0)	ND(3000)
Chloroform (Trichloromethane)	ug/L	100	180000	150000	ID	ID	ND(1.0)	ND(17)	ND(500)	ND(3.3)	ND(1.0)	ND(1.4)	ND(710)	ND(250)	ND(420)	ND(1.0)	ND(1.0)	ND(3000)
Chloromethane (Methyl Chloride)	ug/L	1100	45000	490000	36000	210000	ND(1.0)	ND(17)	ND(500)	ND(3.3)	ND(1.0)	ND(1.4)	ND(710)	ND(250)	ND(420)	ND(1.0)	ND(1.0)	ND(3000)
cis-1,2-Dichloroethene	ug/L	70	210000	200000	530000	ID	ND(1.0)	ND(17)	ND(500)	ND(3.3)	ND(1.0)	ND(1.4)	ND(710)	ND(250)	ND(420)	ND(1.0)	ND(1.0)	ND(3000)
Cyclohexane	ug/L	–	–	–	–	–	ND(1.0)	ND(17)	ND(500)	ND(3.3)	ND(1.0)	ND(1.4)	ND(710)	ND(250)	ND(420)	ND(1.0)	ND(1.0)	ND(3000)
Dibromochloromethane	ug/L	100	110000	18000	ID	ID	ND(1.0)	ND(17)	ND(500)	ND(3.3)	ND(1.0)	ND(1.4)	ND(710)	ND(250)	ND(420)	ND(1.0)	ND(1.0)	ND(3000)
Dichlorodifluoromethane (CFC-12)	ug/L	4800	300000	200000	ID	ID	ND(1.0)	ND(17)	ND(500)	ND(3.3)	ND(1.0)	ND(1.4)	ND(710)	ND(250)	ND(420)	ND(1.0)	ND(1.0)	ND(3000)
Ethylbenzene	ug/L	74	170000	170000	43000	170000	ND(1.0)	ND(17)	ND(500)	ND(3.3)	1.3	ND(1.4)	ND(710)	370*	620*	ND(1.0)	ND(1.0)	4200*
Isopropylbenzene	ug/L	2300	56000	56000	29000	ID	ND(5.0)	ND(83)	ND(2500)	ND(17)	ND(5.0)	ND(7.2)	ND(3600)	ND(1200)	ND(2100)	ND(5.0)	ND(5.0)	ND(17000)
Methyl acetate	ug/L	–	–	–	–	–	ND(10)	ND(170)	ND(5000)	ND(33)	ND(10)	ND(14)	ND(7100)	ND(2500)	ND(4200)	ND(10)	ND(10)	ND(33000)
Methyl cyclohexane	ug/L	–	–	–	–	–	ND(1.0)	ND(17)	ND(500)	ND(3.3)	ND(1.0)	ND(1.4)	ND(710)	ND(250)	ND(420)	ND(1.0)	ND(1.0)	ND(3000)
Methyl Tert Butyl Ether	ug/L	40	470000000	610000	ID	ID	ND(5.0)	ND(83)	ND(2500)	ND(17)	ND(5.0)	ND(7.2)	ND(3600)	ND(1200)	ND(2100)	ND(5.0)	ND(5.0)	ND(17000)
Methylene chloride	ug/L	5	1400000	230000	ID	ID	ND(5.0)	ND(83)	ND(2500)	ND(17)	ND(5.0)	ND(7.2)	ND(3600)	ND(1200)	ND(2100)	ND(5.0)	ND(5.0)	ND(17000)
Styrene	ug/L	100	310000	9700	140000	310000	ND(1.0)	ND(17)	ND(500)	ND(3.3)	ND(1.0)	ND(1.4)	ND(710)	ND(250)	ND(420)	ND(1.0)	ND(1.0)	ND(3000)
Tetrachloroethene	ug/L	5	170000	12000	ID	200000	ND(1.0)	ND(17)	ND(500)	ND(3.3)	ND(1.0)	ND(1.4)	ND(710)	ND(250)	ND(420)	ND(1.0)	ND(1.0)	ND(3000)
Toluene	ug/L	790	530000	530000	41000	ID	1.1	ND(17)	1300*	12	5.2	5.2	ND(710)	7500*	ND(420)	ND(1.0)	ND(1.0)	9000*
trans-1,2-Dichloroethene	ug/L	100	200000	230000	230000	ID	ND(1.0)	ND(17)	ND(500)	ND(3.3)	ND(1.0)	ND(1.4)	ND(710)	ND(250)	ND(420)	ND(1.0)	ND(1.0)	ND(3000)
Trichloroethene	ug/L	5	97000	22000	ID	1100000	ND(1.0)	ND(17)	ND(500)	ND(3.3)	ND(1.0)	ND(1.4)	ND(710)	ND(250)	ND(420)	ND(1.0)	ND(1.0)	ND(3000)
Trichlorofluoromethane (CFC-11)	ug/L	7300	1100000	1100000	ID	1100000	ND(1.0)	ND(17)	ND(500)	ND(3.3)	ND(1.0)	ND(1.4)	ND(710)	ND(250)	ND(420)	ND(1.0)	ND(1.0)	ND(3000)
Trichlorotrifluoromethane (Freon 113)	ug/L	170000	170000	170000	ID	170000	ND(1.0)	ND(17)	ND(500)	ND(3.3)	ND(1.0)	ND(1.4)	ND(710)	ND(250)	ND(420)	ND(1.0)	ND(1.0)	ND(3000)
Vinyl chloride	ug/L	2	13000	1000	330000	ID	ND(1.0)	ND(17)	ND(500)	ND(3.3)	ND(1.0)	ND(1.4)	ND(710)	ND(250)	ND(420)	ND(1.0)	ND(1.0)	ND(3000)
Xylene (total)	ug/L	280	190000	190000	70000	190000	ND(2.0)	ND(33)	ND(1000)	ND(6.7)	2.9	ND(2.9)	ND(1400)	1400*	1400*	ND(2.0)	ND(2.0)	13000*
cis-1,3-Dichloropropene	ug/L	–	–	–	–	–	ND(1.0)	ND(17)	ND(500)	ND(3.3)	ND(1.0)	ND(1.4)	ND(710)	ND(250)	ND(420)	ND(1.0)	ND(1.0)	ND(3000)
trans-1,3-Dichloropropene	ug/L	–	–	–	–	–	ND(1.0)	ND(17)	ND(500)	ND(3.3)	ND(1.0)	ND(1.4)	ND(710)	ND(250)	ND(420)	ND(1.0)	ND(1.0)	ND(3000)
1,3-Dichloropropene	ug/L	25	26000	2500	120000	ID	ND(1.0)	ND(17)	ND(500)	ND(3.3)	ND(1.0)	ND(1.4)	ND(710)	ND(250)	ND(420)	ND(1.0)	ND(1.0)	ND(3000)
General Chemistry																		
Ammonia	mg/L	10	7100	ID	ID	3500	–	–	–	–	–	–	0.9	0.5	ND(0.2)	–	–	12*
Nitrate (as N)	mg/L	10	NLV	310000	ID	ID	–	–	–	–	–	–	ND(0.10)	ND(0.10)	ND(0.10)	–	–	ND(0.10)
Nitrite (as N)	mg/L	1		ID	ID	ID	–	–	–	–	–	–	ND(0.50)	ND(0.10)	ND(0.10)	–	–	ND(0.10)
Orthophosphate	mg/L	–	–	–	–	–	–	–	–	–	–	–	ND(0.50)	ND(0.50)	ND(0.50)	–	–	1.1
Sulfate	mg/L	250	NLV	ID	ID	ID	–	–	–	–	–	–	ND(1.0)	46.5	45.3	–	–	11.5
Sulfide	mg/L	–	–	–	–	–	–	–	–	–	–	–	ND(1.0)	ND(1.0)	ND(1.0)	–	–	ND(1.0)
Total Organic Carbon (TOC)	mg/L	–	–	–	–	–	–	–	–	–	–	–	8	14	10	–	–	15
Metals																		
Iron	mg/L	0.3	NLV	54000	ID	ID	–	–	–	–	–	–	16.2*	7.8*	1.3*	–	–	1.7*
Iron (Dissolved)	mg/L	0.3	NLV	58000	ID	ID	–	–	–	–	–	–	16.9*	8.1*	1.2*	–	–	1.6*
Manganese	mg/L	0.05	NLV	9100	ID	ID	–	–	–	–	–	–	0.52*	0.59*	1.3*	–	–	1.3*
Manganese (Dissolved)	mg/L	0.05	NLV	9100	ID	ID	–	–	–	–	–	–	0.54*	0.65*	1.2*	–	–	1.3*

Notes:

- Cleanup criteria established in Part (7) of administrative rules promulgated December 13, 2002, pursuant to Part 201, Environmental Remediation, 1994 PA 451 as amended.

1000**	Exceeds Part 201 Generic Criteria, referenced by column.

ND ( ) = Not detected above the value in parenthesis.

– = No criteria or not analyzed.

35298Room-4-T4D

MI0013189

TABLE 4

SUMMARY OF JUNE 2004 GROUNDWATER RESULTS
WOLVERINE GASKET INKSTER FACILITY
INKSTER, MICHIGAN

Sample Location		MW-8	MW-9	MWO-41	MWO-42	MWO-43	Trip Blank	Trip Blank	Field Blank
Sample Identification		GW-35298-061704-BF-025	GW-35298-061704-BF-024	GW-35298-061704-BF-023	GW-35298-061704-BF-020	GW-35298-061704-BF-022	TRIP BLANK-35298-061604-BF-009	TRIP BLANK-35298-061704-BF-026	BLANK-35298-061604-BF-019
Sample Date		6/17/2004	6/17/2004	6/17/2004	6/17/2004	6/17/2004	6/16/2004	6/17/2004	6/16/2004
Sample Type	Units								
TCL VOCs									
1,1,1-Trichloroethane	ug/L	ND(25)	ND(1300)	ND(1.0)	ND(1.4)	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)
1,1,2,2-Tetrachloroethane	ug/L	ND(25)	ND(1300)	ND(1.0)	ND(1.4)	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)
1,1,2-Trichloroethane	ug/L	ND(25)	ND(1300)	ND(1.0)	ND(1.4)	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)
1,1-Dichloroethane	ug/L	79	ND(1300)	ND(1.0)	ND(1.4)	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)
1,1-Dichloroethene	ug/L	ND(25)	ND(1300)	ND(1.0)	ND(9.4)	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)
1,2,4-Trichlorobenzene	ug/L	ND(120)	ND(6200)	ND(5.0)	ND(7.2)	ND(5.0)	ND(5.0)	ND(5.0)	ND(5.0)
1,2,4-Trimethylbenzene	ug/L	ND(25)	ND(1300)	ND(1.0)	ND(1.4)	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)
1,2-Dibromo-3-chloropropane (DBCP)	ug/L	ND(25)	ND(1300)	ND(1.0)	ND(1.4)	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)
1,2-Dibromoethane (Ethylene Dibromide)	ug/L	ND(25)	ND(1300)	ND(1.0)	ND(1.4)	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)
1,2-Dichlorobenzene	ug/L	ND(25)	ND(1300)	ND(1.0)	ND(1.4)	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)
1,2-Dichloroethane	ug/L	ND(25)	ND(1300)	ND(1.0)	ND(1.4)	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)
1,2-Dichloropropane	ug/L	ND(25)	ND(1300)	ND(1.0)	ND(1.4)	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)
1,3-Dichlorobenzene	ug/L	ND(25)	ND(1300)	ND(1.0)	ND(1.4)	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)
1,4-Dichlorobenzene	ug/L	ND(25)	ND(1300)	ND(1.0)	ND(1.4)	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)
2-Butanone (Methyl Ethyl Ketone)	ug/L	ND(620)	ND(31000)	ND(25)	ND(36)	ND(25)	ND(25)	ND(25)	ND(25)
2-Hexanone	ug/L	ND(1200)	ND(62000)	ND(50)	ND(72)	ND(50)	ND(50)	ND(50)	ND(50)
4-Methyl-2-Pentanone (Methyl Isobutyl Ketone)	ug/L	ND(1200)	ND(62000)	ND(50)	ND(72)	ND(50)	ND(50)	ND(50)	ND(50)
Acetone	ug/L	ND(620)	ND(31000)	ND(25)	ND(36)	ND(25)	ND(25)	ND(25)	ND(25)
Benzene	ug/L	39*	44000**	ND(1.0)	ND(1.4)	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)
Bromodichloromethane	ug/L	ND(25)	ND(1300)	ND(1.0)	ND(1.4)	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)
Bromoform	ug/L	ND(25)	ND(1300)	ND(1.0)	ND(1.4)	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)
Bromomethane (Methyl Bromide)	ug/L	ND(25)	ND(1300)	ND(1.0)	ND(1.4)	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)
Carbon disulfide	ug/L	ND(120)	ND(6200)	ND(5.0)	ND(7.2)	ND(5.0)	ND(5.0)	ND(5.0)	ND(5.0)
Carbon tetrachloride	ug/L	ND(25)	ND(1300)	ND(1.0)	ND(1.4)	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)
Chlorobenzene	ug/L	650*	8600*	5.5	42	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)
Chloroethane	ug/L	ND(25)	ND(1300)	ND(1.0)	ND(1.4)	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)
Chloroform (Trichloromethane)	ug/L	ND(25)	ND(1300)	ND(1.0)	ND(1.4)	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)
Chloromethane (Methyl Chloride)	ug/L	ND(25)	ND(1300)	ND(1.0)	ND(1.4)	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)
cis-1,2-Dichloroethene	ug/L	ND(25)	ND(1300)	ND(1.0)	ND(1.4)	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)
Cyclohexane	ug/L	ND(25)	ND(1300)	ND(1.0)	ND(1.4)	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)
Dibromochloromethane	ug/L	ND(25)	ND(1300)	ND(1.0)	ND(1.4)	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)
Dichlorodifluoromethane (CFC-12)	ug/L	ND(25)	ND(1300)	ND(1.0)	ND(1.4)	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)
Ethylbenzene	ug/L	ND(25)	ND(1300)	ND(1.0)	ND(1.4)	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)
Isopropylbenzene	ug/L	ND(120)	ND(6200)	ND(5.0)	ND(7.2)	ND(5.0)	ND(5.0)	ND(5.0)	ND(5.0)
Methyl acetate	ug/L	ND(250)	ND(12000)	ND(10)	ND(14)	ND(10)	ND(10)	ND(10)	ND(10)
Methyl cyclohexane	ug/L	ND(25)	ND(1300)	ND(1.0)	ND(1.4)	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)
Methyl Tert Butyl Ether	ug/L	ND(120)	ND(6200)	ND(5.0)	ND(7.2)	ND(5.0)	ND(5.0)	ND(5.0)	ND(5.0)
Methylene chloride	ug/L	ND(120)	ND(6200)	ND(5.0)	ND(7.2)	ND(5.0)	ND(5.0)	ND(5.0)	ND(5.0)
Styrene	ug/L	ND(25)	ND(1300)	ND(1.0)	ND(1.4)	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)
Tetrachloroethene	ug/L	ND(25)	ND(1300)	ND(1.0)	ND(1.4)	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)
Toluene	ug/L	190	ND(1300)	ND(1.0)	ND(1.4)	ND(1.0)	ND(1.0)	ND(1.0)	1.7
trans-1,2-Dichloroethene	ug/L	ND(25)	ND(1300)	ND(1.0)	ND(1.4)	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)
Trichloroethene	ug/L	ND(25)	ND(1300)	ND(1.0)	ND(1.4)	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)
Trichlorofluoromethane (CFC-11)	ug/L	ND(25)	ND(1300)	ND(1.0)	ND(1.4)	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)
Trifluorotrichloroethane (Freon 113)	ug/L	ND(25)	ND(1300)	ND(1.0)	ND(1.4)	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)
Vinyl chloride	ug/L	ND(25)	ND(1300)	ND(1.0)	ND(1.4)	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)
Xylene (total)	ug/L	74	ND(2500)	ND(2.0)	ND(2.9)	ND(2.0)	ND(2.0)	ND(2.0)	ND(2.0)
cis-1,3-Dichloropropene	ug/L	ND(25)	ND(1300)	ND(1.0)	ND(1.4)	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)
trans-1,3-Dichloropropene	ug/L	ND(25)	ND(1300)	ND(1.0)	ND(1.4)	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)
1,3-Dichloropropene	ug/L	ND(25)	ND(1300)	ND(1.0)	ND(1.4)	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)
General Chemistry									
Ammonia	mg/L	7.3	0.2	--	--	--	--	--	--
Nitrate (as N)	mg/L	0.22	ND(0.10)	--	--	--	--	--	--
Nitrite (as N)	mg/L	0.11	ND(0.10)	--	--	--	--	--	--
Orthophosphate	mg/L	2.5	ND(0.50)	--	--	--	--	--	--
Sulfate	mg/L	36.9	ND(1.0)	--	--	--	--	--	--
Sulfide	mg/L	ND(1.0)	ND(1.0)	--	--	--	--	--	--
Total Organic Carbon (TOC)	mg/L	35	13	--	--	--	--	--	--
Metals									
Iron	mg/L	0.85*	2.2*	--	--	--	--	--	--
Iron (Dissolved)	mg/L	0.14	2.2*	--	--	--	--	--	--
Manganese	mg/L	0.35*	3.2*	--	--	--	--	--	--
Manganese (Dissolved)	mg/L	0.37*	3.5*	--	--	--	--	--	--

Notes:
- Cleanup criteria established in Part 17 of administrative rules promulgated December 13, 2002, pursuant to Part 201, Environmental Remediation, 1994 PA 451 as amended
- 10000** Exceeds Part 201 Generic Criteria, referenced in column
- ND ( ) - Not detected above the value in parenthesis
- -- No criteria or not analyzed

35298Rcmm-4-T-D

MI0013190

TABLE 5

SUMMARY OF HISTORICAL GROUNDWATER RESULTS
WOLVERINE GASKET INKSTER FACILITY
INKSTER, MICHIGAN

Sample Location		Michigan Act 451, Part 201 Groundwater Residential and Industrial-Commercial Generic Cleanup Criteria [1]																											
Sample Identification		Industrial & Commercial II, II, IV Drinking Water	Industrial & Commercial II, II & IV Groundwater Volatilization to Indoor Air Inhalation	Groundwater Contact	Flammability and Explosivity Screening Levels	Acute Inhalation Screening Levels	MW-1	MW-1	MW-1	MW-1	MW-1	MW-1	MW-1	MW-1	MW-1	MW-1	MW-1	MW-1	MW-1	MW-1	MW-2	MW-2	MW-2	MW-2	MW-2	MW-2	MW-2	MW-2	MW-2	MW-2	MW-2
Sample Date							MW-1	MW-1	MW-1	MW-1	MW-1	MW-1	MW-1	MW-1	MW-1	MW-1	MW-1	MW-1	MW-1	MW-1	MW-2	MW-2	MW-2	MW-2	MW-2	MW-2	MW-2	MW-2	MW-2	MW-2	MW-2
Sample Type	Units						5/1/1992	12/1/1992	5/1/1993	12/1/1993	8/1/1994	11/1/1994	4/1/1995	11/1/1995	5/11/1999	9/1/1999	7/1/2000	11/14/2000	5/22/2001	1/14/2002	5/1/1992	12/1/1992	5/1/1993	12/1/1993	8/1/1994	11/1/1994	4/1/1995	11/1/1995	5/11/1999	9/1/1999	1/1/2000
		a	b	c	d	e																									
VOCs																															
1,1-Dichloroethane	ug/L	2500	2300000	2400000	380000	ID	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–
1,2,4-Trimethylbenzene	ug/L	63	56000	56000	56000	ID	–	–	–	–	–	–	–	–	1.9	–	–	–	–	–	–	–	–	–	–	–	–	–	ND(100)	–	–
Benzene	ug/L	5	35000	11000	68000	67000	–	–	–	–	–	–	–	–	3300[a]	–	–	13000[a,d]	580[a]	4200[a]	–	–	–	–	–	–	–	–	270[a]	–	–
Chlorobenzene	ug/L	100	470000	86000	160000	ID	–	–	–	–	–	–	–	–	1800[a]	–	–	–	–	–	–	–	–	–	–	–	–	–	56000[a]	–	–
Ethylbenzene	ug/L	74	170000	170000	43000	170000	–	–	–	–	–	–	–	–	110[a]	–	–	180[a]	210[a]	62	–	–	–	–	–	–	–	–	3000[a]	–	–
Isopropylbenzene	ug/L	2300	56000	56000	29000	ID	–	–	–	–	–	–	–	–	ND(1.0)	–	–	–	–	–	–	–	–	–	–	–	–	–	ND(100)	–	–
Toluene	ug/L	790	530000	530000	61000	ID	273000[a,d]	110000[a,d]	71000[a,d]	6600[a]	70000[a,d]	34000[a]	41000[a]	16000[a]	720	160	12000[a]	1300[a]	460	63	98000[a,d]	390000[a,d]	290000[a,d]	1300[a]	230000[a,d]	110000[a,d]	61000[a]	190000[a,d]	120000[a,d]	5500[a]	140000[a,d]
Xylene (total)	ug/L	280	190000	190000	70000	190000	6900[a]	8700[a]	8700[a]	1900[a]	6700[a]	2100[a]	5600[a]	3200[a]	220	460[a]	3100[a]	550[a]	840[a]	120	ND()	12000[a]	14000[a]	400[a]	ND()	3900[a]	6100[a]	7000[a]	14000[a]	29000[a]	20000[a]

Notes:

- Cleanup criteria established in Part (7) of administrative rules promulgated December 13, 2002, pursuant to Part 201, Environmental Remediation, 1994 PA 451 as amended

1000[a,d] Exceeds Part 201 Generic Criteria, referenced by column.

ND ( ) - Not detected above the value in parenthesis.

– No criteria or not analyzed.

MI0013191

TABLE 5

SUMMARY OF HISTORICAL GROUNDWATER RESULTS
WOLVERINE GASKET INKSTER FACILITY
INKSTER, MICHIGAN

Sample Location		MW-2	MW-2	MW-2	MW-2	MW-2	MW-3	MW-3	MW-3	MW-3	MW-3	MW-3	MW-3	MW-3	MW-3	MW-3	MW-3	MW-3	MW-3	MW-3	MW-3	MW-3	MW-5	MW-6	MW-6	MW-6	MW-6	MW-6	MW-7	MW-7	MW-7	MW-7	MW-7	MW-7	MW-7	MW-7
Sample Identification		MW-2	MW-2	MW-2	MW-2	MW-2	MW-3	MW-3	MW-3	MW-3	MW-3	MW-3	MW-3	MW-3	MW-3	MW-3	MW-3	MW-3	MW-3	MW-3	MW-3	MW-3	MW-5	MW-6	MW-6	MW-6	MW-6	MW-6	MW-7	MW-7	MW-7	MW-7	MW-7	MW-7	MW-7	MW-7
Sample Date		7/1/2000	11/14/2000	5/22/2001	11/14/2001	9/27/2002	5/1/1992	12/1/1992	5/1/1993	12/1/1993	8/1/1994	11/1/1994	4/1/1995	11/1/1995	5/11/1999	9/1/1999	2/1/2000	7/1/2000	11/14/2000	5/22/2001	11/14/2001	9/27/2002	5/11/1999	5/11/1999	11/14/2000	5/22/2001	11/14/2001	9/27/2002	5/1/1992	12/1/1992	5/1/1993	12/1/1993	8/1/1994	11/1/1994	4/1/1995	11/1/1995
Sample Type	Units																																			
VOCs																																				
1,1-Dichloroethane	ug/L	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–
1,2,4-Trimethylbenzene	ug/L	–	–	–	–	–	–	–	–	–	–	–	–	–	ND(1.0)	–	–	–	–	–	–	–	ND(1.0)	ND(1.0)	–	–	–	–	–	–	–	–	–	–	–	–
Benzene	ug/L	–	110[a]	320[a]	ND(1.0)	78[a]	–	–	–	–	–	–	–	–	1300[a]	–	–	–	7700[a]	4100[a]	7400[a]	13000[a,b]	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)	–	–	–	–	–	–	–	–
Chlorobenzene	ug/L	–	–	–	–	–	–	–	–	–	–	–	–	–	20000[a]	–	–	–	–	–	–	–	ND(1.0)	ND(1.0)	–	–	–	–	–	–	–	–	–	–	–	–
Ethylbenzene	ug/L	–	720[a]	3600[a]	1200[a]	4400[a]	–	–	–	–	–	–	–	–	800[a]	–	–	–	200[a]	470[a]	320[a]	520[a]	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)	–	–	–	–	–	–	–	–
Isopropylbenzene	ug/L	–	–	–	–	–	–	–	–	–	–	–	–	–	4	–	–	–	–	–	–	–	ND(1.0)	ND(1.0)	–	–	–	–	–	–	–	–	–	–	–	–
Toluene	ug/L	120000[a,d]	69000[a,d]	140000[a,d]	32000[a]	100000[a,d]	3500[a]	12000[a]	11000[a]	3500[a]	22000[a]	9300[a]	7600[a]	24000[a]	8100[a]	1500[a]	7600[a]	6700[a]	470	3100[a]	2500[a]	670	ND(1.0)	1.6	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)	4000[a]	47000[a]	780000[a,b,d]	12000[a]	28000[a]	16000[a]	56000[a]	37000[a]
Xylene (total)	ug/L	13000[a]	3300[a]	17000[a]	5500[a]	21000[a]	1700[a]	3800[a]	3700[a]	1800[a]	4600[a]	2600[a]	2100[a]	5700[a]	3200[a]	5200[a]	3800[a]	3400[a]	350[a]	1800[a]	1500[a]	1200[a]	ND(3.0)	ND(3.0)	ND(3.0)	ND(3.0)	ND(3.0)	ND(3.0)	56000[a]	38000[a]	15000[a]	20000[a]	30000[a]	15000[a]	51000[a]	41000[a]

Notes:
- Cleanup criteria established in Part (7) of administrative rules promulgated December 13, 2002, pursuant to Part 201, Environmental Remediation, 1994 PA 451 as amended
- [a] 1000[a] Exceeds Part 201 Generic Criteria, referenced by column.
- ND ( ) – Not detected above the value in parenthesis.
- – No criteria or not analyzed.

3529\Romini-I-T5D

MI0013192

TABLE 5

SUMMARY OF HISTORICAL GROUNDWATER RESULTS
WOLVERINE GASKET INKSTER FACILITY
INKSTER, MICHIGAN

Sample Location		*MW-7*	*MW-7*	*MW-7*	*MW-7*	*MW-7*	*MW-7*	*MW-7*	*MW-7*	*MW-8*	*MW-9*	*MWO-01*	*MWO-01*	*MWO-01*	*MWO-01*	*MWO-01*	*MWO-01(B1)*	*MWO-02*	*MWO-02*	*MWO-02*	*MWO-02*	*MWO-02*	*MWO-02(B4)*	*MWO-03*	*MWO-03*	*MWO-03*	*MWO-03*	*MWO-03*	*MWO-03(B5)*	*SB-1*	*SB-2*	*SB-3*	*SB-4*
Sample Identification		*MW-7*	*MW-7*	*MW-7*	*MW-7*	*MW-7*	*MW-7*	*MW-7*	*MW-7*	*MW-8*	*MW-9*	*MWO-01*	*MWO-01*	*MWO-01*	*MWO-01*	*MWO-01*	*MWO-01(B1)*	*MWO-02*	*MWO-02*	*MWO-02*	*MWO-02*	*MWO-02*	*MWO-02(B4)*	*MWO-03*	*MWO-03*	*MWO-03*	*MWO-03*	*MWO-03*	*MWO-03(B5)*	*SB-1*	*SB-2*	*SB-3*	*SB-4*
Sample Date		*5/13/1999*	*9/1/1999*	*1/1/2000*	*7/1/2000*	*11/14/2000*	*5/22/2001*	*1/14/2002*	*9/27/2002*	*11/11/2002*	*11/11/2002*	*5/11/1999*	*11/14/2000*	*5/22/2001*	*1/14/2002*	*9/27/2002*	*11/9/1989*	*5/11/1999*	*11/14/2000*	*5/22/2001*	*1/14/2002*	*9/27/2002*	*11/9/1989*	*5/11/1999*	*11/14/2000*	*5/22/2001*	*1/14/2002*	*9/27/2002*	*11/9/1989*	*11/8/1989*	*11/8/1989*	*11/8/1989*	*11/8/1989*
Sample Type	*Units*																																
VOCs																																	
1,1-Dichloroethane	ug/L	–	–	–	–	–	–	–	–	59	ND(1)	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–
1,2,4-Trimethylbenzene	ug/L	ND(100)	–	–	–	–	–	–	–	–	–	ND(1.0)	–	–	–	–	–	ND(1.0)	–	–	–	–	–	ND(1.0)	–	–	–	–	–	–	–	–	–
Benzene	ug/L	9900[a]	–	–	–	8800[a]	2600[a]	6400[a]	6600[a]	18[a]	47000[a,b,c]	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)	–	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)	–	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)	–	–	–	–	–
Chlorobenzene	ug/L	180000[a,c]	–	–	–	–	–	–	–	370[a]	7600[a]	ND(1.0)	–	–	–	–	–	ND(1.0)	–	–	–	–	–	ND(1.0)	–	–	–	–	–	–	–	–	–
Ethylbenzene	ug/L	11000[a]	–	–	–	5000[a]	2400[a]	4800[a]	760[a]	12	110[a]	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)	–	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)	–	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)	–	–	–	–	–
Isopropylbenzene	ug/L	ND(100)	–	–	–	–	–	–	–	–	–	ND(1.0)	–	–	–	–	–	ND(1.0)	–	–	–	–	–	ND(1.0)	–	–	–	–	–	–	–	–	–
Toluene	ug/L	35000[a]	4900[a]	12000[a]	26000[a]	14000[a]	6400[a]	9400[a]	410	6.6	ND(1)	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)	3	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)	21	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)	3	7500[a]	22	110000[a,d]	24
Xylene (total)	ug/L	44000[a]	24000[a]	56000[a]	32000[a]	22000[a]	10000[a]	20000[a]	3000[a]	50	250	ND(3.0)	ND(3.0)	ND(3.0)	ND(3.0)	ND(3.0)	10	ND(3.0)	ND(3.0)	ND(3.0)	ND(3.0)	ND(3.0)	ND(3)	ND(3.0)	ND(3.0)	ND(3.0)	ND(3.0)	ND(3.0)	ND(3)	820[a]	ND(3)	11000[a]	73

Notes:

- Cleanup criteria established in Part (7) of administrative rules promulgated December 13, 2002, pursuant to Part 201, Environmental Remediation, 1994 PA 451 as amended

1000[a,b] Exceeds Part 201 Generic Criteria, referenced by column.

ND( ) – Not detected above the value in parenthesis.

– No criteria or not analyzed.

MI0013193

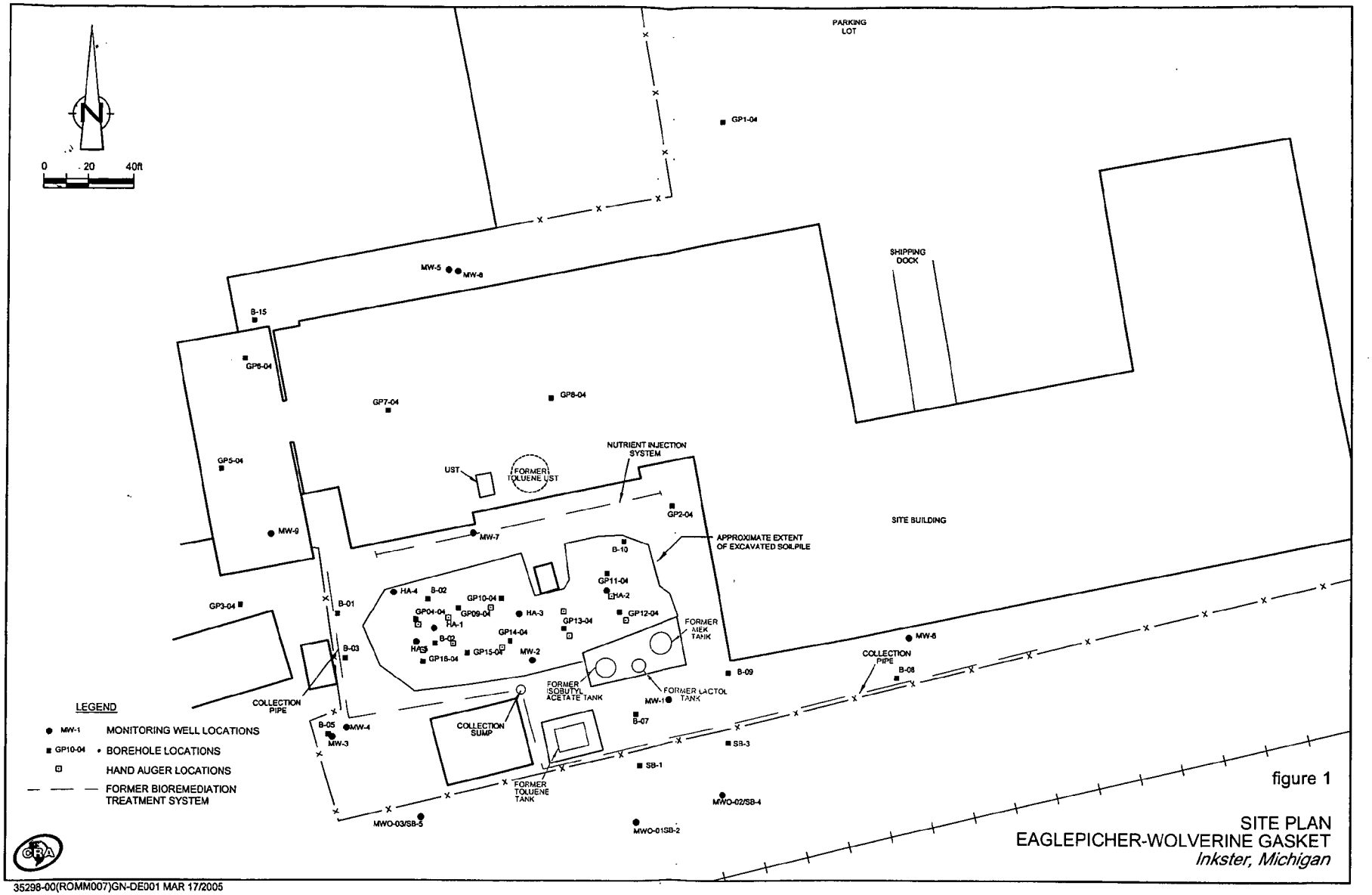


figure 1

SITE PLAN
EAGLEPICHER-WOLVERINE GASKET
Inkster, Michigan

35298-00(ROMM007)GN-DE001 MAR 17/2005

MI0013194

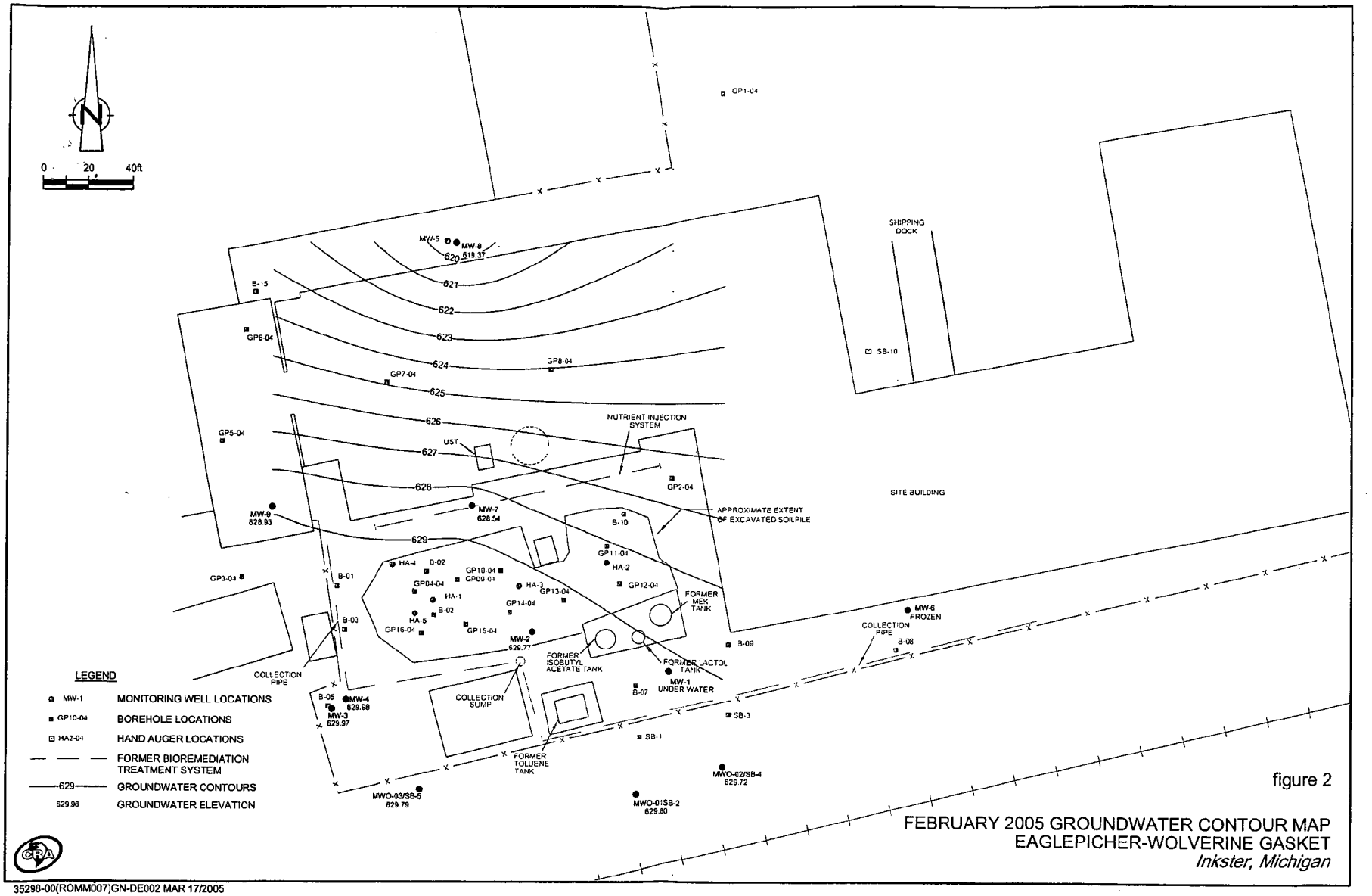


figure 2

FEBRUARY 2005 GROUNDWATER CONTOUR MAP
EAGLEPICHER-WOLVERINE GASKET
Inkster, Michigan

35298-00(ROMM007)GN-DE002 MAR 17/2005

MI0013195

TABLE I

SOIL ANALYTICAL RESULTS SUMMARY
EAGLEPICHER AUTOMOTIVE
INKSTER, MICHIGAN

Michigan Act 451, Part 201 Residential and Commercial [(1)]

Location													MW 101-05	MW 102-05
Sample Identification		Drinking Water Protection	Groundwater Surface Water Interface Protection	Groundwater Contact Protection	Soil Volatilization to Indoor Air Inhalation	Infinite Source Volatile Soil Inhalation	Finite VSIC for 5 Meter Source	Finite VSIC for 2 Meter Source Thickness	Particulate Soil Inhalation	Direct Contact	Soil Saturation Concentration Screening	2354-051905-IY-8	3-42354-051905-IY-4002
Sample Date												5/19/2005	5/19/2005
Sample Depth (ft BGS)	Units	b	c	d	e	f	g	h	i	j	k	(8-2)	(7-3)
Volatile Organic Compounds													
1,1,1-Trichloroethane	ug/kg	4000	4000	460000	250000	3800000	12000000	28000000	6700000000.0	460000	460000	ND(94)	ND(3800)
1,1,2,2-Tetrachloroethane	ug/kg	170	1600	940000	4300	10000	10000	14000	5400000	53000	870000	ND(94)	ND(3800)
1,1,2-Trichloroethane	ug/kg	100	8600	420000	4600	17000	21000	44000	1900000000	180000	920000	ND(94)	ND(3800)
1,1-Dichloroethane	ug/kg	18000	15000	890000	230000	2100000	5900000	14000000	3300000000.0	890000	890000	ND(94)	ND(3800)
1,1-Dichloroethene	ug/kg	140	1700	720000	62	1100	5300	13000	6300000	200000	570000	ND(94)	ND(3800)
1,2,4-Trichlorobenzene	ug/kg	4200	1800	1100000	1100000	28000000	28000000	28000000	2500000000	990000	1100000	ND(470)	ND(19000)
1,2,4-Trimethylbenzene	ug/kg	2100	570	110000	110000	21000000	50000000	50000000	8200000000	110000	110000	ND(190)	ND(7600)
1,2-Dibromo-3-chloropropane (DBCP)	ug/kg	10		1200	1200	13000	13000	13000	13000000	1200	1200	ND(470)	ND(19000)
1,2-Dibromoethane (Ethylene Dibromide)	ug/kg	20	20	500	670	1700	1700	3300	14000000	91	690000	ND(470)	ND(19000)
1,2-Dichlorobenzene	ug/kg	14000	360	210000	210000	39000000	39000000	52000000	10000000000.0	210000	210000	ND(190)	ND(7600)
1,2-Dichloroethane	ug/kg	100	7200	380000	2100	6200	11000	26000	12000000	91000	1200000	80 J	ND(3800)
1,2-Dichloropropane	ug/kg	100	5800	220000	4000	25000	50000	110000	27000000	140000	550000	ND(94)	ND(3800)
1,3,5-Trimethylbenzene	ug/kg	1800	1100	94000	94000	16000000	38000000	38000000	8200000000	94000	94000	ND(190)	ND(7600)
1,3-Dichlorobenzene	ug/kg	170	1100	51000	ID	ID	ID	ID	ID	170000	170000	ND(190)	ND(7600)
1,4-Dichlorobenzene	ug/kg	1700	290	140000	19000	77000	77000	110000	45000000	400000		ND(190)	ND(7600)
2-Butanone (Methyl Ethyl Ketone)	ug/kg	260000	44000	27000000	27000000	3900000	29000000	35000000	6700000000	27000000	27000000	ND(1400)	ND(57000)
2-Hexanone	ug/kg	20000		2500000	990000	1100000	1100000	1400000	2700000000	2500000	2500000	ND(470)	ND(190000)
4-Methyl-2-Pentanone (Methyl Isobutyl Ketone)	ug/kg	36000	ID	2700000	2700000	4500000	43000000	67000000	14000000000.0	2700000	2700000	ND(470)	ND(190000)
Acetone	ug/kg	15000	34000	110000000	110000000	130000000	130000000	190000000	39000000000.0	23000000	110000000	ND(1400)	ND(57000)
Benzene	ug/kg	100	4000	220000	1600	13000	24000	79000	280000000	180000	400000	ND(94)	190000 [STL-Lab]
Bromodichloromethane	ug/kg	1600	ID	280000	1200	9100	9700	19000	8400000000	110000	1500000	ND(190)	ND(7600)
Bromoform	ug/kg	1600	ID	870000	150000	900000	900000	900000	2800000000	820000	870000	ND(190)	ND(7600)
Bromomethane (Methyl Bromide)	ug/kg	200	700	1400000	860	11000	57000	140000	3500000000	320000	2500000	ND(370)	ND(15000)
Carbon disulfide	ug/kg	16000	ID	280000	76000	1300000	7900000	19000000	4700000000	280000	280000	ND(470)	ND(19000)
Carbon tetrachloride	ug/kg	100	900	92000	190	3500	12000	28000	1300000000	96000	390000	ND(94)	ND(3800)
Chlorobenzene	ug/kg	2000	940	360000	120000	770000	990000	2100000	470000000	360000	360000	3600 [STL-Lab]	600000 [STL-Lab]
Chloroethane	ug/kg	3600	ID	950000	950000	30000000	120000000	280000000	6700000000.0	950000	950000	ND(470)	ND(19000)
Chloroform (Trichloromethane)	ug/kg	1600	3400	1500000	7200	45000	120000	270000	1300000000	1200000	1500000	ND(94)	ND(3800)
Chloromethane (Methyl Chloride)	ug/kg	5200	ID	1100000	2300	40000	410000	1000000	4900000000	1100000	1100000	ND(470)	ND(19000)
cis-1,2-Dichloroethene	ug/kg	1400	12000	640000	22000	180000	430000	990000	2300000000	640000	640000	ND(94)	ND(3800)
Cyclohexane	ug/kg											47 J	ND(91000)
Dibromochloromethane	ug/kg	1600	ID	360000	3900	24000	24000	33000	1200000000	110000	610000	ND(94)	ND(3800)
Dichlorodifluoromethane (CFC-12)	ug/kg	95000	ID	1000000	900000	13000000	550000000	1400000000	3300000000000	1000000	1000000	ND(190)	ND(7600)
Ethylbenzene	ug/kg	1500	360	140000	87000	720000	1000000	2200000	1000000000	140000	140000	230	ND(3800)
Isopropylbenzene	ug/kg	91000	ID	390000	390000	1700000	1700000	2800000	5800000000	390000	390000	14 J	5100 J
Methyl acetate	ug/kg											ND(2200)	ND(91000)
Methyl cyclohexane	ug/kg											300 J	11000 J
Methyl Tert Butyl Ether	ug/kg	800	15000	5900000	5900000	25000000	39000000	87000000	2600000000.0	1500000	5900000	ND(470)	ND(19000)
Methylene chloride	ug/kg	100	19000	2500000	45000	210000	590000	1400000	6600000000	1300000	2300000	ND(470)	ND(19000)
Styrene	ug/kg	2700	2200	270000	250000	970000	970000	1400000	5500000000	400000	570000	ND(94)	ND(3800)
Tetrachloroethene	ug/kg	100	900	88000	11000	180000	480000	1100000	5400000000	88000	88000	ND(94)	ND(3800)
Toluene	ug/kg	16000	2800	250000	250000	2800000	5100000	12000000	2700000000.0	250000	250000	68 J	ND(7600)
trans-1,2-Dichloroethene	ug/kg	2000	30000	1400000	23000	280000	830000	2000000	4700000000	1400000	1400000	ND(94)	ND(3800)
trans-1,3-Dichloropropene	ug/kg											ND(94)	ND(3800)
cis-1,3-Dichloropropene	ug/kg											ND(94)	ND(3800)
1,3-Dichloropropene	ug/kg	170		110000	1000	18000	68000	160000	7800000000	10000	670000		
Trichloroethene	ug/kg	100	4000	440000	7100	73000	170000	390000	1800000000	500000	500000	ND(94)	ND(3800)
Trichlorofluoromethane (CFC-11)	ug/kg	52000		560000	560000	9300000	630000000	1500000000	3800000000000	560000	560000	ND(190)	ND(7600)
Trifluorotrichloroethane (Freon 113)	ug/kg	550000	1700	550000	550000	19000000	880000000	2100000000	5100000000000	550000	550000	ND(470)	ND(19000)
Vinyl chloride	ug/kg	40	300	20000	270	4200	30000	73000	350000000	3800	490000	ND(75)	ND(3000)
Xylene (total)	ug/kg	5600	700	150000	150000	6400000.0	61000000	130000000	2900000000.0	150000	150000	1700 [STL-Lab]	160000 [STL-Lab]

ND ( ) - Not detected above the value in parenthesis.
STL - Lab Qualifiers:

J - Laboratory qualified as an estimated value.
B - Laboratory qualifier: Method blank contamination. The associated method blank contains the target analyte at a reportable level.
(1) - Clean up criteria identified by MDEQ RRD OP Memo No. 1, dated June 24, 20[illegible]
3000 [STL-Lab] - Exceeds generic criteria referenced by column.

CRA 42350Yinkster-1-T1D

MI0013196

TABLE 1

SOIL ANALYTICAL RESULTS SUMMARY
EAGLEPICHER AUTOMOTIVE
INKSTER, MICHIGAN

Sample Identification Sample Date Sample Depth (ft BGS)	Units	Drinking Water Protection b	Groundwater Surface Water Interface Protection c	Groundwater Contact Protection d	Soil Volatilization to Indoor Air Inhalation e	In-Situ Source Volatile Soil Inhalation f	Finite VSIC for 5 Meter Source g	Finite VSIC for 2 Meter Source Thickness h	Particulate Soil Inhalation i	Direct Contact j	Soil Screening Concentration Screening k	S-23354-891905-JY-4 8/19/2005 (0-2)	S-23354-891905-JY-002 8/19/2005 (1-2)	
Semi-Volatile Organic Compounds	ug/kg												ND(260)	ND(5300)
	ug/kg		39000		910000	NLV	NLV	NLV	NLV	2300000000	2300000		ND(260)	ND(5300)
2,2'-oxybis(1-Chloropropane) (bis(2-chloroisopropyl) ether)	ug/kg		2400	330	200000	NLV	NLV	NLV	NLV	100000000	710000		ND(260)	ND(5300)
2,4,5-Trichlorophenol	ug/kg		1500	380	960000	NLV	NLV	NLV	NLV	5100000000	660000	1800000	ND(260)	ND(5300)
2,4,6-Trichlorophenol	ug/kg		7400	7600	10000000	NLV	NLV	NLV	NLV	6700000000	11000000		ND(260)	ND(5300)
2,4-Dichlorophenol	ug/kg												ND(150)	ND(3000)
2,4-Dimethylphenol	ug/kg		430		170000	NLV	NLV	NLV	NLV	16000000	48000		ND(260)	ND(5300)
2,4-Dinitrophenol	ug/kg												ND(260)	ND(5300)
2,4-Dinitrotoluene	ug/kg		620000		2300000	ID	ID	ID	ID	ID	56000000		ND(260)	ND(5300)
2,6-Dinitrotoluene	ug/kg		400	440	1900000	ID	ID	ID	ID	ID	1400000	190000000	ND(260)	ND(5300)
2-Chloronaphthalene	ug/kg		57000	ID	5500000	ID	ID	ID	ID	ID	8100000		150 J	410 J
2-Chlorophenol	ug/kg		7400	1400	16000000	NLV	NLV	NLV	NLV	6700000000	11000000		ND(260)	ND(5300)
2-Methylnaphthalene	ug/kg												ND(200)	ND(4000)
2-Methylphenol	ug/kg		400	ID	1600000	NLV	NLV	NLV	NLV	ID	630000		ND(260)	ND(5300)
2-Nitroaniline	ug/kg		2000	2000	4600	NLV	NLV	NLV	NLV	650000	6600		ND(1600)	ND(32000)
2-Nitrophenol	ug/kg												ND(200)	ND(4000)
3,3'-Dichlorobenzidine	ug/kg		800		190000	NLV	NLV	NLV	NLV	ID	79000		ND(150)	ND(3000)
3-Nitroaniline	ug/kg												ND(260)	ND(5300)
4,6-Dinitro-2-methylphenol	ug/kg		5800	280	3000000	NLV	NLV	NLV	NLV	ID	45000000		ND(260)	ND(5300)
4-Bromophenyl phenyl ether	ug/kg												ND(150)	ND(3000)
4-Chloro-3-methylphenol	ug/kg												ND(260)	ND(5300)
4-Chloroaniline	ug/kg		7400	1400	16000000	NLV	NLV	NLV	NLV	6700000000	11000000		ND(260)	ND(5300)
4-Chlorophenyl phenyl ether	ug/kg												ND(200)	ND(4000)
4-Methylphenol	ug/kg												ND(200)	ND(4000)
4-Nitroaniline	ug/kg		300000	4400	970000	190000000	810000000	810000000	810000000	1400000000	41000000		ND(260)	ND(5300)
4-Nitrophenol	ug/kg		5980	ID	440000	6000000	2200000	2200000	2200000	2300000000	1600000		ND(260)	ND(5300)
Acenaphthene	ug/kg		30000		1100000	1100000	4400000000	4400000000	4400000000	3300000000	1100000	1100000	63 J	ND(5300)
Acenaphthylene	ug/kg		41000	ID	41000	1000000000	1400000000	1400000000	1400000000	6700000000	2300000000		ND(260)	ND(5300)
Acetophenone	ug/kg		60	150	110000	NLV	NLV	NLV	NLV	ID	71000		ND(40)	ND(800)
Anthracene	ug/kg												ND(260)	ND(5300)
Atrazine	ug/kg		NLL	NLL	NLL	NLV	NLV	NLV	NLV	ID	20000		ND(260)	ND(5300)
Benzaldehyde	ug/kg		NLL	NLL	NLL	NLV	NLV	NLV	NLV	1500000	2000		ND(260)	ND(5300)
Benzo(a)anthracene	ug/kg		NLL	NLL	NLL	ID	ID	ID	ID	ID	20000		32 J	ND(5300)
Benzo(a)pyrene	ug/kg		NLL	NLL	NLL	NLV	NLV	NLV	NLV	8000000000	2500000		21 J	ND(5300)
Benzo(b)fluoranthene	ug/kg		NLL	NLL	NLL	NLV	NLV	NLV	NLV	ID	200000		ND(260)	ND(5300)
Benzo(g,h,i)perylene	ug/kg												ND(260)	ND(5300)
Benzo(k)fluoranthene	ug/kg												ND(260)	ND(5300)
Biphenyl	ug/kg		100	300	110000	8300	3800	3800	3800	9400000	13000	2300000	ND(80)	ND(1600)
bis(2-Chloroethoxy)methane	ug/kg		NLL	NLL	NLL	NLV	NLV	NLV	NLV	7000000000	2800000	10000000	75 J B	ND(5300)
bis(2-Chloroethyl)ether	ug/kg		310000	26000	310000	NLV	NLV	NLV	NLV	4700000000	310000	310000	ND(260)	ND(5300)
bis(2-Ethylhexyl)phthalate	ug/kg		120000		1000000000	NLV	NLV	NLV	NLV	6700000000	53000000		ND(260)	ND(5300)
Butyl benzylphthalate	ug/kg		9400	1100	820000	NLV	NLV	NLV	NLV	ID	530000		ND(260)	ND(5300)
Caprolactam	ug/kg		NLL	NLL	NLL	ID	ID	ID	ID	ID	2000000		33 J	ND(5300)
Carbazole	ug/kg		NLL	NLL	NLL	NLV	NLV	NLV	NLV	ID	3000		ND(260)	ND(5300)
Chrysene	ug/kg		ID	1700	ID	ID	ID	ID	ID	ID	ID		40 J	ND(5300)
Dibenz(a,h)anthracene	ug/kg		110000	2200	740000	NLV	NLV	NLV	NLV	3300000000	740000	740000	ND(260)	ND(5300)
Dibenzofuran	ug/kg		790000		790000	NLV	NLV	NLV	NLV	3300000000	790000	790000	ND(260)	ND(5300)
Diethyl phthalate	ug/kg		760000	11000	760000	NLV	NLV	NLV	NLV	3300000000	760000	760000	ND(260)	ND(5300)
Dimethyl phthalate	ug/kg		100000000	ID	1400000000	NLV	NLV	NLV	NLV	ID	6900000	1400000000	ND(260)	ND(5300)
Di-n-butylphthalate	ug/kg		730000	5500	730000	100000000	7400000000	7400000000	7400000000	9500000000	4600000		25 J	ND(5300)
Di-n-octyl phthalate	ug/kg		390000	5300	890000	590000000	13000000000	13000000000	13000000000	9500000000	2700000		ND(260)	ND(5300)
Fluoranthene	ug/kg		1800	350	8200	41000	17000	17000	17000	6800000	8900		ND(260)	ND(5300)
Fluorene	ug/kg		26000	91	350000	130000	130000	130000	130000	1400000000	100000	3500000	ND(40)	ND(800)
Hexachlorobenzene	ug/kg		320000	ID	720000	30000	50000	50000	50000	13000000	720000	720000	ND(260)	ND(5300)
Hexachlorobutadiene	ug/kg		430	1800	110000	40000	550000	930000	930000	2300000000	230000		ND(260)	ND(5300)
Hexachlorocyclopentadiene	ug/kg		NLL	NLL	NLL	NLV	NLV	NLV	NLV	ID	20000		ND(260)	ND(5300)
Hexachloroethane	ug/kg		15000	11000	2400000	NLV	NLV	NLV	NLV	12000000000	2400000	2400000	ND(260)	830 J
Indeno(1,2,3-cd)pyrene	ug/kg		35000	870	2100000	250000	300000	300000	300000	2000000000	1600000		98 J	310 J
Isophorone	ug/kg		330	2600	220000	91000	54000	54000	54000	4700000000	100000	490000	ND(260)	ND(5300)
Naphthalene	ug/kg		330		7200	NLV	NLV	NLV	NLV	1600000	1200	1500000	ND(260)	ND(5300)
Nitrobenzene	ug/kg		5400		700000	NLV	NLV	NLV	NLV	ID	1700000		ND(260)	ND(5300)
N-Nitrosodi-n-propylamine	ug/kg		22	6	4300	NLV	NLV	NLV	NLV	10000000	90000		ND(130)	ND(2600)
N-Nitrosodiphenylamine	ug/kg		56000	5300	1100000	2800000	160000	160000	160000	6700000	1600000		34 J	ND(5300)
Pentachlorophenol	ug/kg		88000	4200	12000000	NLV	NLV	NLV	NLV	40000000000	12000000	12000000	ND(260)	550 J
Phenanthrene	ug/kg		480000	ID	480000	100000000	650000000	650000000	650000000	6700000000	2900000		23 J	ND(5300)
Phenol														
Pyrene														

ND ( ) - Not detected above the value in parenthesis.
STL - Lab Qualifiers:

J - Laboratory qualified as an estimated value.
B - Laboratory qualifier: Method blank contamination. The associated method blar

(1) - Clean up criteria identified by MDEQ RRD OP Memo No. 1, dated June 24, 20
XXXX" - Exceeds generic criteria referenced by column.

CRA 42354Dynamic-1-T1D

MI0013197

TABLE 2

GROUNDWATER ANALYTICAL RESULTS
EAGLEPICHER AUTOMOTIVE
INKSTER, MICHIGAN

		Michigan Act 451, Part 201 Groundwater Residential and Industrial-Commercial Generic Cleanup Criteria (1)											
Smaple Location		Residential & Commercial I Drinking Water	Industrial & Commercial II, III, IV Drinking Water	Groundwater Surface Water Interface	Residential & Commercial I Groundwater Volatilization to Indoor Air Inhalation	Industrial & Commercial II, III & IV Groundwater Volatilization to Indoor Air Inhalation	Groundwater Contact	Water Solubility	Flammability and Explosivity Screening Levels	Acute Inhalation Screening Levels	MW 101-05	MW 101-05	MW 102-05
Sample Identification											GW-42354-091905-JY-004	GW-42354-091905-JY-005	GW-42354-091905-JY-006
Sample Date											9/20/2005	9/20/2005	9/20/2005
Sample Type												Duplicate	
	Units	a	b	c	d	e	f	g	h	i			
Volatile Organic Compounds													
1,1,1-Trichloroethane	ug/L	200	200	200	660000	1200000	1300000	1300000	ID	1300000	ND(5000)	ND(8300)	ND(8300)
1,1,2,2-Tetrachloroethane	ug/L	8.5	35	78	12000	77000	4700	2970000	ID	ID	ND(5000)	ND(8300)	ND(8300)
1,1,2-Trichloroethane	ug/L	5	5	330	17000	110000	21000	4420000		ID	ND(5000)	ND(8300)	ND(8300)
1,1-Dichloroethane	ug/L	880	2500	740	1000000	2300000	2400000	5060000	380000	ID	ND(5000)	ND(8300)	ND(8300)
1,1-Dichloroethene	ug/L	7	7	65	200	1200	11000	2250000	97000	140000	ND(5000)	ND(8300)	ND(8300)
1,2,4-Trichlorobenzene	ug/L	70	70	30	300000	300000	19000	300000		300000	ND(250000)	ND(420000)	ND(420000)
1,2,4-Trimethylbenzene	ug/L	63	63	17	56000	56000	56000	55890	56000	ID	ND(5000)	ND(8300)	ND(8300)
1,2-Dibromo-3-chloropropane (DBCP)	ug/L	0.2	0.2		1200	1200	390	1230		ID	ND(5000)	ND(8300)	ND(8300)
1,2-Dibromoethane (Ethylene Dibromide)	ug/L	0.05	0.05	0.2	2400	15000	25	4200000	ID	ID	ND(5000)	ND(8300)	ND(8300)
1,2-Dichlorobenzene	ug/L	600	600	16	160000	160000	160000	156000		160000	ND(5000)	ND(8300)	ND(8300)
1,2-Dichloroethane	ug/L	5	5	360	9600	99000	19000	8520000	2500000	ID	ND(5000)	ND(8300)	ND(8300)
1,2-Dichloropropane	ug/L	5	5	290	16000	36000	16000	2800000	350000	2800000	ND(5000)	ND(8300)	ND(8300)
1,3,5-Trimethylbenzene	ug/L	72	72	45	61000	61000	61000	61150	ID	ID	ND(5000)	ND(8300)	ND(8300)
1,3-Dichlorobenzene	ug/L	6.6	19	38	ID	ID	2000	111000	ID	ID	ND(5000)	ND(8300)	ND(8300)
1,4-Dichlorobenzene	ug/L	75	75	13	16000	74000	6400	72800		ID	ND(5000)	ND(8300)	ND(8300)
2-Butanone (Methyl Ethyl Ketone)	ug/L	13000	38000	2200	240000000	240000000	240000000	240000000	ID	240000000	15000 J[1,4]	16000 J[1,4]	41000 J[1,4]
2-Hexanone	ug/L	1300	2900		4200000	8700000	5200000	16000000		ID	ND(250000)	ND(420000)	ND(420000)
4-Methyl-2-Pentanone (Methyl Isobutyl Ketone)	ug/L	1400	5300	ID	20000000	20000000	13000000	20000000	ID	20000000	ND(250000)	ND(420000)	ND(420000)
Acetone	ug/L	700	2100	1700	1000000000	1000000000	3100000	1000000000	1500000000	1000000000	ND(1200000)	ND(2100000)	ND(2100000)
Benzene	ug/L	5	5	200	5600	35000	11000	1750000	68000	67000	3500[1,4]	3600 J[1,4]	6700 J[1,4]
Bromodichloromethane	ug/L	80	80	ID	4800	37000	14000	6740000	ID	ID	ND(5000)	ND(8300)	ND(8300)
Bromoform	ug/L	80	80	ID	470000	3100000	140000	3100000	ID	ID	ND(5000)	ND(8300)	ND(8300)
Bromomethane (Methyl Bromide)	ug/L	10	29	35	4000	9000	70000	14500000	ID	ID	ND(5000)	ND(8300)	ND(8300)
Carbon disulfide	ug/L	800	2300	ID	250000	550000	1200000	1190000	13000	ID	ND(25000)	ND(42000)	ND(42000)
Carbon tetrachloride	ug/L	5	5	45	370	2400	4600	793000	ID	96000	ND(5000)	ND(8300)	ND(8300)
Chlorobenzene	ug/L	100	100	47	210000	470000	86000	475000	160000	ID	210000[1,4,5]	180000[1,4,5]	180000[1,4,5]
Chloroethane	ug/L	430	1700	ID	5700000	5700000	440000	5740000	110000	ID	ND(5000)	ND(8300)	ND(8300)
Chloroform (Trichloromethane)	ug/L	80	80	170	28000	180000	150000	7920000	ID	ID	ND(5000)	ND(8300)	ND(8300)
Chloromethane (Methyl Chloride)	ug/L	260	1100	ID	8600	45000	490000	6340000	36000	210000	ND(5000)	ND(8300)	ND(8300)
cis-1,2-Dichloroethene	ug/L	70	70	620	93000	210000	200000	3500000	530000	ID	ND(5000)	ND(8300)	ND(8300)
Cyclohexane	ug/L										ND(5000)	ND(8300)	ND(8300)
Dibromochloromethane	ug/L	80	80	ID	14000	110000	18000	2600000	ID	ID	ND(5000)	ND(8300)	ND(8300)
Dichlorodifluoromethane (CFC-12)	ug/L	1700	6800	ID	220000	300000	200000	300000	ID	ID	ND(5000)	ND(8300)	ND(8300)
Ethylbenzene	ug/L	74	74	18	110000	170000	170000	169000	43000	170000	9900[1,4]	6500 J[1,4]	5500 J[1,4]
Isopropylbenzene	ug/L	800	2300	ID	56800	56000	56000	56000	29000	ID	ND(25000)	ND(42000)	ND(42000)
Methyl acetate	ug/L										ND(50000)	ND(83000)	ND(83000)
Methyl cyclohexane	ug/L										ND(5000)	ND(8300)	ND(8300)
Methyl Tert Butyl Ether	ug/L	40	40	730	47000000	47000000	610000	46800000	ID	ID	ND(25000)	ND(42000)	ND(42000)
Methylene chloride	ug/L	5	5	940	220000	1400000	220000	17000000	ID	ID	ND(25000)	ND(42000)	ND(42000)
Styrene	ug/L	100	100	80	170000	310000	9700	310000	140000	310000	ND(5000)	ND(8300)	ND(8300)
Tetrachloroethene	ug/L	5	5	45	25000	170000	12000	200000	ID	200000	ND(5000)	ND(8300)	ND(8300)
Toluene	ug/L	790	790	140	530000	530000	530000	526000	61000	ID	26000[1,4]	22000[1,4]	15000[1,4]
trans-1,2-Dichloroethene	ug/L	100	100	1300	85000	300000	230000	6000000	330000	ID	ND(5000)	ND(8300)	ND(8300)
trans-1,3-Dichloropropene	ug/L										ND(5000)	ND(8300)	ND(8300)
cis-1,3-Dichloropropene	ug/L										ND(5000)	ND(8300)	ND(8300)
1,3-Dichloropropene - Total	ug/L	8.5	35		2900	26000	5500	2800000	130000	ID			
Trichloroethene	ug/L	5	5	200	15000	97000	22000	1100000	ID	1100000	ND(5000)	ND(8300)	ND(8300)
Trichlorofluoromethane (CFC-11)	ug/L	2600	7300		1100000	1100000	1100000	1100000	ID	1100000	ND(5000)	ND(8300)	ND(8300)
Trifluorotrichloroethane (Freon 113)	ug/L	170000	170000	32	170000	170000	170000	170000	ID	170000	ND(5000)	ND(8300)	ND(8300)
Vinyl chloride	ug/L	2	2	15	1100	13000	1000	2760000	33000	ID	ND(5000)	ND(8300)	ND(8300)
Xylene (total)	ug/L	280	280	35	190000	190000	190000	186000	70000	190000	41000[1,4]	29000[1,4]	23000[1,4]

ND ( ) - Not detected above the value in parenthesis.
STL - Lab Qualifiers:

Organics:
J - Laboratory qualified as an estimated value.

(1) - Clean up criteria identified by MDEQ RRD OP Memo No. 1, dated June 24, 2005
15000[1,4] - Exceeds generic criteria referenced by column.

CRA 42354-Oyster-1-T2D

MI0013198

TABLE 2

GROUNDWATER ANALYTICAL RESULTS
EAGLEPICHER AUTOMOTIVE
INKSTER, MICHIGAN

Sample Location Sample Identification Sample Date Sample Type	Units	Residential & Commercial I Drinking Water a	Industrial & Commercial II, III, IV Drinking Water b	Groundwater Surface Water Interface c	Residential & Commercial I Groundwater Volatilization to Indoor Air Inhalation d	Industrial & Commercial II, III & IV Groundwater Volatilization to Indoor Air Inhalation e	Groundwater Contact f	Water Solubility g	Flammability and Explosivity Screening Levels h	Acute Inhalation Screening Levels i	MW 101-05 GW-12354-091905-JY-004 9/20/2005	MW 101-05 GW-12354-091905-JY-005 9/20/2005 Duplicate	MW 102-05 GW-12354-091905-JY-006 9/20/2005
Semi-Volatile Organic Compounds													
2,2'-oxybis(1-Chloropropane) (bis(2-chloroisopropyl) ether)	ug/L										ND(250)	ND(250)	ND(250)
2,4,5-Trichlorophenol	ug/L	730	2100		NLV	NLV	170000	1200000	ID	ID	ND(250)	ND(250)	ND(250)
2,4,6-Trichlorophenol	ug/L	120	470	4.4	NLV	NLV	10000	800000	ID	ID	ND(200)	ND(200)	ND(200)
2,4-Dichlorophenol	ug/L	73	210	19	NLV	NLV	48000	4500000	ID	ID	ND(500)	ND(500)	ND(500)
2,4-Dimethylphenol	ug/L	370	1000	380	NLV	NLV	539000	7870000	ID	ID	ND(250)	ND(250)	ND(250)
2,4-Dinitrophenol	ug/L										ND(1000)	ND(1000)	ND(1000)
2,4-Dinitrotoluene	ug/L	7.7	32		NLV	NLV	8600	270000	ID	ID	ND(250)	ND(250)	ND(250)
2,6-Dinitrotoluene	ug/L										ND(250)	ND(250)	ND(250)
2-Chloronaphthalene	ug/L	1800	5300		ID	ID	6700	6740	ID	ID	ND(250)	ND(250)	ND(250)
2-Chlorophenol	ug/L	45	130	22	ID	ID	94000	22000000	ID	ID	97 J[1]	100 J[1]	34 J[1]
2-Methylnaphthalene	ug/L	260	750	ID	ID	ID	25000	24600	ID	ID	ND(250)	ND(250)	ND(250)
2-Methylphenol	ug/L	370	1000	71	NLV	NLV	810000	28000000		ID	ND(250)	ND(250)	ND(250)
2-Nitroaniline	ug/L										ND(1000)	ND(1000)	ND(1000)
2-Nitrophenol	ug/L	20	58	ID	NLV	NLV	79000	2500000	ID	ID	ND(250)	ND(250)	ND(250)
3,3'-Dichlorobenzidine	ug/L	1.1	4.3	0.3	NLV	NLV	180	3110	ID	ID	ND(200)	ND(200)	ND(200)
3-Nitroaniline	ug/L										ND(1000)	ND(1000)	ND(1000)
4,6-Dinitro-2-methylphenol	ug/L	20	20		NLV	NLV	9500	300000	ID	ID	ND(1000)	ND(1000)	ND(1000)
4-Bromophenyl phenyl ether	ug/L										ND(250)	ND(250)	ND(250)
4-Chloro-3-methylphenol	ug/L	150	420	7.4	NLV	NLV	79000	3900000	ID	ID	ND(250)	ND(250)	ND(250)
4-Chloroaniline	ug/L										ND(500)	ND(500)	ND(500)
4-Chlorophenyl phenyl ether	ug/L										ND(250)	ND(250)	ND(250)
4-Methylphenol	ug/L	370	1000	71	NLV	NLV	810000	28000000		ID	38 J	ND(250)	ND(250)
4-Nitroaniline	ug/L										ND(1000)	ND(1000)	ND(1000)
4-Nitrophenol	ug/L										ND(1000)	ND(1000)	ND(1000)
Acenaphthene	ug/L	1300	3800	19	4200	4200	4200	4240	ID	ID	ND(250)	ND(250)	ND(250)
Acenaphthylene	ug/L	52	150	ID	3900	3900	3900	3930	ID	ID	ND(250)	ND(250)	ND(250)
Acetophenone	ug/L	1500	4400		6100000	6100000	6100000	6100000	ID	ID	130 J	140 J	80 J
Anthracene	ug/L	43	43	ID	43	43	43	43.4	ID	ID	ND(250)	ND(250)	ND(250)
Atrazine	ug/L	3	3	7.3	NLV	NLV	5400	70000	ID	ID	ND(150)	ND(150)	ND(150)
Benzaldehyde	ug/L										ND(500)	ND(500)	ND(500)
Benzo(a)anthracene	ug/L	2.1	8.5	ID	NLV	NLV	9.4	9.4	ID	ID	ND(50)	ND(50)	ND(50)
Benzo(a)pyrene	ug/L	5	5	ID	NLV	NLV	1	1.62	ID	ID	ND(50)	ND(50)	ND(50)
Benzo(b)fluoranthene	ug/L	1.5	1.5	ID	ID	ID	1.5	1.5	ID	ID	ND(50)	ND(50)	ND(50)
Benzo(g,h,i)perylene	ug/L	1	1		NLV	NLV	1	0.26	ID	ID	ND(50)	ND(50)	ND(50)
Benzo(k)fluoranthene	ug/L	1	1		NLV	NLV	1	0.8	ID	ID	ND(50)	ND(50)	ND(50)
Biphenyl	ug/L										ND(500)	ND(500)	ND(500)
bis(2-Chloroethoxy)methane	ug/L										ND(250)	ND(250)	ND(250)
bis(2-Chloroethyl)ether	ug/L	2	8.3	15	38000	210000	5700	17000000	17000000	170000000	ND(50)	ND(50)	ND(50)
bis(2-Ethylhexyl)phthalate	ug/L	6	6	32	NLV	NLV	320	340		340	ND(250)	ND(250)	ND(250)
Butyl benzylphthalate	ug/L	1200	3700	14	NLV	NLV	2700	2690	ID	ID	ND(250)	ND(250)	ND(250)
Caprolactam	ug/L	5800	17000		NLV	NLV	390000000	5250000000		1000000000	ND(500)	ND(500)	ND(500)
Carbazole	ug/L	85	350	10	NLV	NLV	7400	7480	ID	ID	ND(500)	ND(500)	ND(500)
Chrysene	ug/L	1.6	1.6	ID	ID	ID	1.6	1.6	ID	ID	ND(50)	ND(50)	ND(50)
Dibenz(a,h)anthracene	ug/L	2	2	ID	NLV	NLV	2	2.49	ID	ID	ND(100)	ND(100)	ND(100)
Dibenzofuran	ug/L	ID	ID	4	ID	ID	ID	10000	ID	ID	ND(200)	ND(200)	ND(200)
Diethyl phthalate	ug/L	5500	16000	130	NLV	NLV	1100000	1080000		ID	ND(250)	ND(250)	ND(250)
Dimethyl phthalate	ug/L	70000	210000		NLV	NLV	4200000	4190000		ID	ND(250)	ND(250)	ND(250)
Di-n-butylphthalate	ug/L	880	2500	9.7	NLV	NLV	11000	11200		ID	ND(250)	ND(250)	ND(250)
Di-n-octyl phthalate	ug/L	130	380	ID	NLV	NLV	400	3000	ID	ID	ND(250)	ND(250)	ND(250)
Fluoranthene	ug/L	210	210	1.6	210	210	210	204	ID	ID	ND(50)	ND(50)	ND(50)
Fluorene	ug/L	880	2000	12	2000	2000	2000	1980	ID	ID	ND(250)	ND(250)	ND(250)
Hexachlorobenzene	ug/L	1	1	0.2	440	3000	4.6	6200	ID	ID	ND(10)	ND(10)	ND(10)
Hexachlorobutadiene	ug/L	15	42	0.05	1600	7200	400	2220	ID	ID	ND(50)	ND(50)	ND(50)
Hexachlorocyclopentadiene	ug/L	50	50	ID	130	420	1600	1800	ID	ID	ND(250)	ND(250)	ND(250)
Hexachloroethane	ug/L	7.3	21	6.7	27000	50000	1900	50000	ID	ID	ND(250)	ND(250)	ND(250)
Indeno(1,2,3-cd)pyrene	ug/L	2	2	ID	NLV	NLV	2	0.022	ID	ID	ND(100)	ND(100)	ND(100)
Isophorone	ug/L	770	3100	570	NLV	NLV	990000	12000000		12000000	130	280	570
Naphthalene	ug/L	520	1500	13	31000	31000	31000	30000		31000	ND(250)	ND(250)	ND(250)
Nitrobenzene	ug/L	3.4	9.6	180	280000	550000	11000	2090000		ID	ND(150)	ND(150)	ND(150)
N-Nitrosodi-n-propylamine	ug/L	5	5		NLV	NLV	360	9890000	ID	ID	ND(250)	ND(250)	ND(250)
N-Nitrosodiphenylamine	ug/L	270	1100		NLV	NLV	35000	35100	ID	ID	ND(250)	ND(250)	ND(250)
Pentachlorophenol	ug/L	1	1	8	NLV	NLV	300	1850000	ID	ID	ND(250)	ND(250)	ND(250)
Phenanthrene	ug/L	52	150	2.4	1000	1000	1000	1000	ID	ID	ND(100)	ND(100)	ND(100)
Phenol	ug/L	4400	13000	210	NLV	NLV	29000000	82000000		ID	34 J	36 J	28 J
Pyrene	ug/L	140	140	ID	140	140	140	135	ID	ID	ND(250)	ND(250)	ND(250)

ND ( ) - Not detected above the value in parenthesis.
STL - Lab Qualifiers:

Organics
J - Laboratory qualified as an estimated value

(1) - Clean up criteria identified by MDEQ RRD OP Memo No. 1, dated June 24, 2005
150[1] - Exceeds generic criteria referenced by column.

CEA 4235(Dynamic)-72D

MI0013199

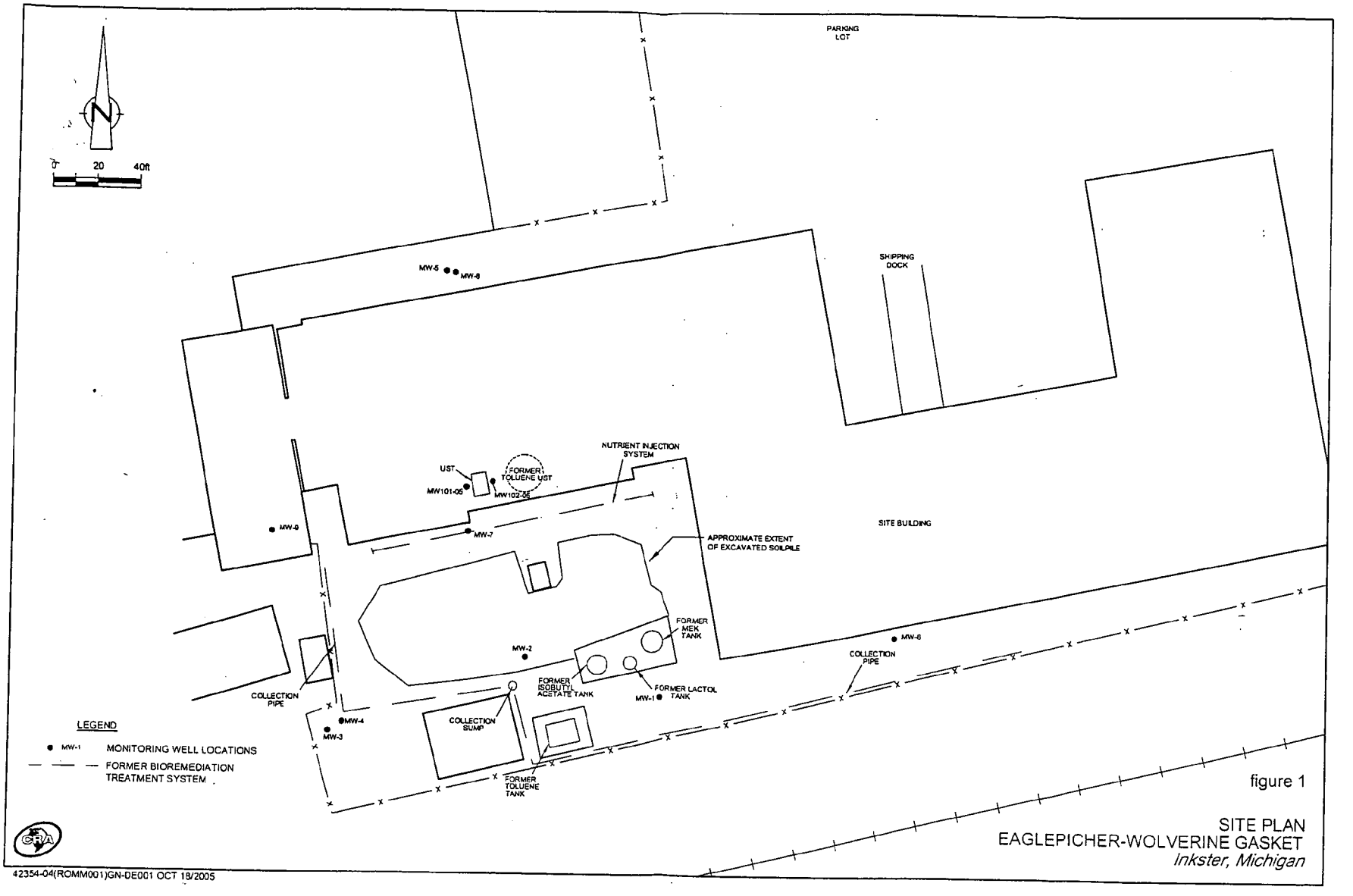


figure 1

SITE PLAN
EAGLEPICHER-WOLVERINE GASKET
Inkster, Michigan

42354-04(ROMM001)GN-DE001 OCT 18/2005

MI0013200

United States Environmental Protection Agency
Region 5
77 West Jackson Blvd.
Chicago, Illinois 60604

Facsimile Cover Sheet

TO: Mr. Thomas Kinney

Via FAX No: (734) 453 - 5201

From: Ross Micham, Geologist
Underground Injection Control Branch

Phone: (312) 886-4237
FAX: (312) 886-4235

Number of pages (including cover): 2

Date: October 6, 2004

NOTE: **Letter for EaglePicher Automotive Project, Inkster, MI (Reference No. 35298)**

Mr. Kinney:

Per our phone conversation today. I am providing you with the letter we prepared for the injection well project at the above site. The original letter will follow in the mail.

If you have any questions about this letter, please feel free to contact me at my number above (or by e-mail at micham.ross@epa.gov).

Thank you.

-- Ross

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:
WU-16J

OCT 0 6 2004

Mr. Thomas M. Kinney, C.P.G.
Conestoga-Rovers & Associates
14496 Sheldon Road, Suite #200
Plymouth, Michigan 48170

Re: Class V Injection Activities Associated with Remediation Efforts at the EaglePicher Automotive, Wolverine Gasket Division Facility at 2638 Princess Street in Inkster, Michigan; U.S. EPA UIC Number MI-163-5X26-0052

Dear Mr. Kinney:

Thank you for providing the Underground Discharge System (Class V) Inventory submittal dated September 21, 2004. The submittal has been reviewed and based upon this information, the proposed injection activity to remediate impacted soil at the above-mentioned facility is authorized by rule and may proceed.

The intent of the Underground Injection Control (UIC) program is to prevent contamination of underground sources of drinking water from fluids released by underground injection, such as the proposed Class V wells at the above-mentioned site. It is the responsibility of the facility owner/operator to construct, operate, maintain and finally plug and abandon wells in such a way as to prevent the movement of any contaminant into underground sources of drinking water if the presence of that contaminant may cause a violation of any primary drinking water regulation or may otherwise adversely affect the health of persons. It is our understanding that these wells are to be used to inject a chemical reagent to remediate contaminated soils at the site. You will need to notify this office if information in the submittal changes, such as ownership of the facility, operating status, construction, or nature of the fluids entering the Class V wells. In any such notification, please include the above U.S. EPA UIC Number. UIC program approval to proceed with the proposed project does not authorize any infringement of state or local law or other federal regulations.

This letter is intended solely to acknowledge submittal of inventory information as required in Title 40 of the Code of Federal Regulations Sections 144.26 and 144.83. We reserve the right to visit this facility and/or require sampling to ensure that the injection activity does not contaminate an underground source of drinking water. The facility owner/operator may still be held liable for such endangerment under provisions in the Safe Drinking Water Act.

If you have any questions regarding this matter, please feel free to contact me at (312) 886-4237.

Sincerely,

Ross Micham, Geologist
Underground Injection Control Branch

CONESTOGA-ROVERS
& ASSOCIATES

14496 Sheldon Road, Suite #200, Plymouth, MI 48170
Telephone: 734-453-5123 Facsimile: 734-453-5201
www.CRAworld.com

September 21, 2004 Reference No. 35298

Ms. Lisa Perenchio WU-16J
United States Environmental Protection Agency (USEPA)
Underground Injection Control Branch
77 W. Jackson Blvd.
Chicago, Illinois 60604-3590

Dear Ms. Perenchio:

Re: Underground Discharge System (Class V) Inventory Sheet
EaglePicher Automotive, Wolverine Gasket Division
2638 Princess Street, Inkster, Michigan

In accordance with 40 C.F.R. 144.83, please find attached two completed Underground Discharge System (Class V) Inventory Sheets for: 1) an open excavation; and 2) up to 60 groundwater injection points through Geoprobe® rods at 2638 Princess Street, Inkster, Michigan. Since these injection points may fall within the definition of a well used in experimental technology, the following information is also provided:

a) Location of wells by township, range, section, and quarter-section. *The wells will be located in the Northwest ¼ of Section 30, Township 2 South, Range 10 East, Wayne County, Michigan;*

b) Date of completion of each well. *No new injection wells will be created. Fluids will be injected through Geoprobe® rods. The Geoprobe® injections will be conducted as necessary for up to two years (maximum of three injections) starting in October 2004. In addition to the Geoprobe® injection points, an injection excavation will be created in the most heavily impacted area. This injection excavation will be completed by mid October and will be a one-time event;*

c) Identification and depth of the underground formation(s) into which each well is injecting. *The underground formation to be injected is the uppermost unit at the site. This unit generally consists of native sands and sandy fill for the upper 1 to 5.5 feet below ground surface (bgs). The surficial sands are underlain by clay that is present beneath the entire Site and extends to approximately 27 feet bgs;*

d) Total depth of each well. *The injection wells will vary in depth between 2 and 6 feet;*

e) Number and spacing of injection points. *There will be up to 60 injection points spaced no more than 20 feet apart;*

f) Construction narrative. *The injections will be performed through 1 ½ inch outside diameter Geoprobe® rods with a 3/8 inch inside diameter. The injection excavation will be created in the*

most heavily impacted area. The approximate dimensions of the excavation are 130 feet by 50 feet and will be approximately 2 feet deep;

g) Nature of injected fluids. Up to three injections of *up to 8 gallons of remediation grade Fenton's Reagent (5% hydrogen peroxide plus 0.8 lb. ferrous sulfate) will be injected into each well under gravity for each 100 gallons of groundwater to be treated.*

h) Average and maximum pressure at the well head. *The average and the maximum pressure will be atmospheric;*

i) Average and maximum injection rate. *The average injection rate will vary per well. The solution will be injected into each well under gravity. It is expected that the average injection rate would be approximately 1 gallon per minute (gpm) and maximum injection rate would be approximately 5 gpm; and*

j) Date of last inspection. *The wells have not yet been installed.*

In order to continue ongoing remediation efforts at the Site, EaglePicher is anxious to complete this work as soon as possible. CRA requests a response to this notification identifying whether EaglePicher can proceed with this work. Please contact me at (734) 453-5123 for notification of the Rule Authorization.

Should you have any questions on the above, please do not hesitate to contact us.

Yours truly,

CONESTOGA-ROVERS & ASSOCIATES

Thomas Kinney

Thomas M. Kinney, C.P.G.

TMK/eb/1/Det.
Encl.

c.c.: Doug Rommeck, EaglePicher
Fred Blickle, CRA

Type or print all information. See reverse for instructions.

OMB No. 2040-0042 Approval Expires 1/31/05

INVENTORY OF INJECTION WELLS

EPA

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF GROUND WATER AND DRINKING WATER

(This information is collected under the authority of the Safe Drinking Water Act)

1. DATE PREPARED *(Year, Month, Day)*: 04-09-21

2. FACILITY ID NUMBER: MID 05354386

PAPERWORK REDUCTION ACT NOTICE

The public reporting burden for this collection of information is estimated at about 0.5 hour per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to Chief, Information Policy Branch, 2136, U.S. Environmental Protection Agency, 401 M Street, SW, Washington, DC 20460, and to the Office of Management and Budget, Paperwork Reduction Project, Washington, DC 20503.

3. TRANSACTION TYPE *(Please mark one of the following)*

- [ ] Deletion
- [x] First Time Entry
- [ ] Entry Change
- [ ] Replacement

4. FACILITY NAME AND LOCATION

A. NAME *(last, first, and middle initial)*: EaglePicher Automotive, Wolverine Gasket Division

B. STREET ADDRESS/ROUTE NUMBER: 2638 Princess Street

C. LATITUDE: DEG 42, MIN 17, SEC 36.6

D. LONGITUDE: DEG 83, MIN 18, SEC 08.64

E. TOWNSHIP/RANGE

TOWNSHIP	RANGE	SECT	1/4 SECT
TO2S	R10E	30	NW

F. CITY/TOWN: Inkster

G. STATE: MI

H. ZIP CODE: 48141

I. NUMERIC COUNTY CODE: 163

J. INDIAN LAND *(mark "x")*: [ ] Yes [x] No

5. LEGAL CONTACT:

A. TYPE *(mark "x")*: [ ] Owner [x] Operator

B. NAME *(last, first, and middle initial)*: Rommek, Douglas A.

C. PHONE *(area code and number)*: (313) 724-2006

D. ORGANIZATION: EaglePicher Automotive, Wolverine Gasket

E. STREET/P.O. BOX: 2638 Princess Street

F. CITY/TOWN: Inkster

G. STATE: MI

H. ZIP CODE: 48141

I. OWNERSHIP *(mark "x")*: [x] PRIVATE [ ] PUBLIC [ ] SPECIFY OTHER [ ] STATE [ ] FEDERAL

6. WELL INFORMATION:

A. CLASS AND TYPE		B. NUMBER OF WELLS COMM	B. NUMBER OF WELLS NON-COMM	C. TOTAL NUMBER OF WELLS	D. WELL OPERATION STATUS UC	AC	TA	PA	AN
V	G		60	60	60				
				0					
				0					
				0					
				0					
				0					
				0					

COMMENTS *(Optional)*:

KEY:

DEG = Degree
MIN = Minute
SEC = Second

SECT = Section
1/4 SECT = Quarter Section

COMM = Commercial
NON-COMM = Non-Commercial

AC = Active
UC = Under Construction
TA = Temporarily Abandoned
PA = Permanently Abandoned and Approved by State
AN = Permanently Abandoned and not Approved by State

EPA Form 7520-16 (Rev. 8-01)

MI0013205

Type or print all information. See reverse for instructions.

OMB No. 2040-0042 Approval Expires 1/31/05

INVENTORY OF INJECTION WELLS

EPA

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF GROUND WATER AND DRINKING WATER

(This information is collected under the authority of the Safe Drinking Water Act)

1. DATE PREPARED *(Year, Month, Day)*: 04-09-21

2. FACILITY ID NUMBER: MID 05354386

PAPERWORK REDUCTION ACT NOTICE

The public reporting burden for this collection of information is estimated at about 0.5 hour per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to Chief, Information Policy Branch, 2136, U.S. Environmental Protection Agency, 401 M Street, SW, Washington, DC 20460, and to the Office of Management and Budget, Paperwork Reduction Project, Washington, DC 20503.

3. TRANSACTION TYPE *(Please mark one of the following)*

- [ ] Deletion
- [x] First Time Entry
- [ ] Entry Change
- [ ] Replacement

4. FACILITY NAME AND LOCATION

A. NAME *(last, first, and middle initial)*: EaglePicher Automotive, Wolverine Gasket Division

B. STREET ADDRESS/ROUTE NUMBER: 2638 Princess Street

C. LATITUDE: DEG 42, MIN 17, SEC 36.6

D. LONGITUDE: DEG 83, MIN 18, SEC 08.64

E. TOWNSHIP/RANGE

TOWNSHIP	RANGE	SECT	1/4 SECT
TO2S	R10E	30	NW

F. CITY/TOWN: Inkster

G. STATE: MI

H. ZIP CODE: 48141

I. NUMERIC COUNTY CODE: 163

J. INDIAN LAND *(mark "x")*: [ ] Yes [x] No

5. LEGAL CONTACT:

A. TYPE *(mark "x")*: [ ] Owner [x] Operator

B. NAME *(last, first, and middle initial)*: Rommek, Douglas A.

C. PHONE *(area code and number)*: (313) 724-2006

D. ORGANIZATION: EaglePicher Automotive, Wolverine Gasket

E. STREET/P.O. BOX: 2638 Princess Street

F. CITY/TOWN: Inkster

G. STATE: MI

H. ZIP CODE: 48141

I. OWNERSHIP *(mark "x")*: [x] PRIVATE [ ] PUBLIC [ ] SPECIFY OTHER [ ] STATE [ ] FEDERAL

6. WELL INFORMATION:

A. CLASS	AND TYPE	B. NUMBER OF WELLS COMM	B. NUMBER OF WELLS NON-COMM	C. TOTAL NUMBER OF WELLS	D. WELL OPERATION STATUS UC	AC	TA	PA	AN
V	G	0	1	1	1				
				0					
				0					
				0					
				0					
				0					
				0					

COMMENTS *(Optional)*:

KEY:

DEG = Degree
MIN = Minute
SEC = Second
SECT = Section
1/4 SECT = Quarter Section

COMM = Commercial
NON-COMM = Non-Commercial
AC = Active
UC = Under Construction
TA = Temporarily Abandoned
PA = Permanently Abandoned and Approved by State
AN = Permanently Abandoned and not Approved by State

EPA Form 7520-16 (Rev. 8-01)

MI0013206

CONESTOGA-ROVERS
& ASSOCIATES

14496 Sheldon Road, Suite #200, Plymouth, MI 48170
Telephone: 734-453-5123 Facsimile: 734-453-5201
www.CRAworld.com

September 7, 2004 Reference No. 35298

Ms. Lisa Perenchio WU-16J
United States Environmental Protection Agency (USEPA)
Underground Injection Control Branch
77 W. Jackson Blvd.
Chicago, Illinois 60604-3590

Dear Ms. Perenchio:

Re: Underground Discharge System (Class V) Inventory Sheet
EaglePicher – Wolverine Gasket Division, 2638 Princess Street, Inkster, Michigan

---

In accordance with 40 C.F.R. 144.83, please find attached two completed Underground Discharge System (Class V) Inventory Sheets for up to 60 groundwater injection points through Geoprobe® rods and an open excavation located at 2638 Princess Street, Inkster, Michigan. Since these injection points may fall within the definition of a well used in experimental technology, the following information is also provided:

a) Location of wells by township, range, section, and quarter-section. *The wells will be located in the Northwest ¼ of Section 30, Township 2 South, Range 10 East, Wayne County, Michigan*

b) Date of completion of each well. *No new injection wells will be created. Fluids will be injected through Geoprobe® rods. The Geoprobe® injections will be conducted as necessary for up to two years (maximum of three injections) starting in October 2004. In addition to the Geoprobe® injection points, an injection excavation will be created in the most heavily impacted area. This injection excavation will be completed by mid October and will be a one-time event.*

c) Identification and depth of the underground formation(s) into which each well is injecting. *The underground formation to be injected is the uppermost unit at the site. This unit generally consists of native sands and sandy fill for the upper 1 to 5.5 feet below ground surface (bgs). The surficial sands are underlain by clay that is present beneath the entire Site and extends to approximately 27 feet bgs.*

d) Total depth of each well. *The injection wells will vary in depth between 2 and 6 feet;*

e) Number and spacing of injection points. *There will be up to 60 injection points spaced no more than 20 feet apart.*

f) Construction narrative. *The injections will be performed through 1 ½ inch Geoprobe® rods with a 3/8 inch center hole. The injection excavation will be created in the most heavily impacted area. The approximate dimensions of the excavation are 130 feet by 50 feet and will be approximately 2 feet deep.*

g) Nature of injected fluids. Up to three injections of *up to 8 gallons of remediation grade Fenton's Reagent (5% hydrogen peroxide plus 0.8 lb. ferrous sulfate) will be injected into each well under gravity for each 100 gallons of groundwater to be treated;*

h) Average and maximum pressure at the well head. *The average and the maximum pressure will be atmospheric;*

i) Average and maximum injection rate. *The average injection rate will vary per well. The solution will be injected into each well under gravity. It is expected that the average injection rate would be approximately 1 gallons per minute (gpm) and maximum injection rate would be approximately 5 gpm;* and

j) Date of last inspection. *The wells have not yet been installed.*

In order to continue ongoing remediation efforts at the Site, EaglePicher is anxious to complete this work as soon as possible. CRA requests a response to this notification identifying whether EaglePicher can proceed with this work. Please contact me at (734) 453-5123 for notification of the Rule Authorization.

Should you have any questions on the above, please do not hesitate to contact us.

Yours truly,

CONESTOGA-ROVERS & ASSOCIATES

DRAFT

Thomas M. Kinney, C.P.G.

TMK/eb/1/Det.
Encl.

c.c.: Doug Rommeck, EaglePicher
Fred Blickle, CRA

Type or print all information. See reverse for instructions.

OMB No. 2040-0042 Approval Expires 1/31/05

INVENTORY OF INJECTION WELLS

EPA

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF GROUND WATER AND DRINKING WATER

(This information is collected under the authority of the Safe Drinking Water Act)

1. DATE PREPARED *(Year, Month, Day)*: 04-08-20

2. FACILITY ID NUMBER: MID 00535438

PAPERWORK REDUCTION ACT NOTICE

The public reporting burden for this collection of information is estimated at about 0.5 hour per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to Chief, Information Policy Branch, 2136, U.S. Environmental Protection Agency, 401 M Street, SW, Washington, DC 20460, and to the Office of Management and Budget, Paperwork Reduction Project, Washington, DC 20503.

3. TRANSACTION TYPE *(Please mark one of the following)*

- [ ] Deletion
- [x] First Time Entry
- [ ] Entry Change
- [ ] Replacement

4. FACILITY NAME AND LOCATION

A. NAME *(last, first, and middle initial)*: EaglePicher

B. STREET ADDRESS/ROUTE NUMBER: 2638 Princess Street

C. LATITUDE

DEG	MIN	SEC
42	17	36.6

D. LONGITUDE

DEG	MIN	SEC
-83	18	08.64

E. TOWNSHIP/RANGE

TOWNSHIP	RANGE	SECT	1/4 SECT
T02S	R10E	30	NW

F. CITY/TOWN: Inkster

G. STATE: MI

H. ZIP CODE: 48141

I. NUMERIC COUNTY CODE: 163

J. INDIAN LAND *(mark "x")*: [ ] Yes [x] No

5. LEGAL CONTACT:

A. TYPE *(mark "x")*: [ ] Owner [x] Operator

B. NAME *(last, first, and middle initial)*: Rommeck, Doug

C. PHONE *(area code and number)*: (313) 724-2006

D. ORGANIZATION: EaglePicher Automotive Group

E. STREET/P.O. BOX: 2638 Princess Street

F. CITY/TOWN: Inkster

G. STATE: MI

H. ZIP CODE: 48141

I. OWNERSHIP *(mark "x")*: [x] PRIVATE [ ] PUBLIC [ ] SPECIFY OTHER [ ] STATE [ ] FEDERAL

6. WELL INFORMATION:

A. CLASS	AND TYPE	B. NUMBER OF WELLS COMM	B. NUMBER OF WELLS NON-COMM	C. TOTAL NUMBER OF WELLS	D. WELL OPERATION STATUS UC	AC	TA	PA	AN
V	G	0	1	1	X				
				0					
				0					
				0					
				0					
				0					
				0					

COMMENTS *(Optional)*: This inventory sheet is for the excavation injection only.

KEY:
DEG = Degree
MIN = Minute
SEC = Second
SECT = Section
1/4 SECT = Quarter Section
COMM = Commercial
NON-COMM = Non-Commercial
AC = Active
UC = Under Construction
TA = Temporarily Abandoned
PA = Permanently Abandoned and Approved by State
AN = Permanently Abandoned and not Approved by State

EPA Form 7520-16 (Rev. 8-01)

MI0013209

MID005354386

Type or print all information. See reverse for instructions.

OMB No. 2040-0042 Approval Expires 1/31/05

INVENTORY OF INJECTION WELLS

EPA

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF GROUND WATER AND DRINKING WATER

(This information is collected under the authority of the Safe Drinking Water Act)

1. DATE PREPARED *(Year, Month, Day)*: 04-08-20

2. FACILITY ID NUMBER: MID 00538438 6

PAPERWORK REDUCTION ACT NOTICE

The public reporting burden for this collection of information is estimated at about 0.5 hour per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to Chief, Information Policy Branch, 2136, U.S. Environmental Protection Agency, 401 M Street, SW, Washington, DC 20460, and to the Office of Management and Budget, Paperwork Reduction Project, Washington, DC 20503.

3. TRANSACTION TYPE *(Please mark one of the following)*

- [ ] Deletion
- [x] First Time Entry
- [ ] Entry Change
- [ ] Replacement

4. FACILITY NAME AND LOCATION

A. NAME *(last, first, and middle initial)*: EaglePicher Wolverine Grant Div.

B. STREET ADDRESS/ROUTE NUMBER: 2638 Princess Street

C. LATITUDE: DEG 42, MIN 17, SEC 36.6

D. LONGITUDE: DEG -83, MIN 18, SEC 08.64

E. TOWNSHIP/RANGE

TOWNSHIP	RANGE	SECT	1/4 SECT
T02S	R10E	30	NW

F. CITY/TOWN: Inkster

G. STATE: MI

H. ZIP CODE: 48141

I. NUMERIC COUNTY CODE: 163

J. INDIAN LAND *(mark "x")*: [ ] Yes [x] No

5. LEGAL CONTACT:

A. TYPE *(mark "x")*: [ ] Owner [x] Operator

B. NAME *(last, first, and middle initial)*: Rommeck, Doug (as A)

C. PHONE *(area code and number)*: (313) 724-2006

D. ORGANIZATION: EaglePicher Automotive Group

E. STREET/P.O. BOX: 2638 Princess Street

F. CITY/TOWN: Inkster

G. STATE: MI

H. ZIP CODE: 48141

I. OWNERSHIP *(mark "x")*: [x] PRIVATE [ ] PUBLIC [ ] SPECIFY OTHER [ ] STATE [ ] FEDERAL

6. WELL INFORMATION:

A. CLASS AND TYPE		B. NUMBER OF WELLS COMM	B. NUMBER OF WELLS NON-COMM	C. TOTAL NUMBER OF WELLS	D. WELL OPERATION STATUS UC	AC	TA	PA	AN
V	G		60	60	X				
				0					
				0					
				0					
				0					
				0					
				0					

COMMENTS *(Optional)*: This inventory sheet is for the injections through the geoprobe rods.

KEY:
DEG = Degree
MIN = Minute
SEC = Second
SECT = Section
1/4 SECT = Quarter Section
COMM = Commercial
NON-COMM = Non-Commercial
AC = Active
UC = Under Construction
TA = Temporarily Abandoned
PA = Permanently Abandoned and Approved by State
AN = Permanently Abandoned and not Approved by State

EPA Form 7520-16 (Rev. 8-01)

MI0013210

SECTION 1. DATE PREPARED: Enter date in order of year, month, and day.

SECTION 2. FACILITY ID NUMBER: In the first two spaces, insert the appropriate U.S. Postal Service State Code. In the third space, insert one of the following one letter alphabetic identifiers:

D - DUNS Number,
G - GSA Number, or
S - State Facility Number.

In the remaining spaces, insert the appropriate nine digit DUNS, GSA, or State Facility Number. For example, A Federal facility (GSA - 123456789) located in Virginia would be entered as : VAG123456789.

SECTION 3. TRANSACTION TYPE: Place an "x" in the applicable box. See below for further instructions.

Deletion. Fill in the Facility ID Number.
First Time Entry. Fill in all the appropriate information.
Entry Change. Fill in the Facility ID Number and the information that has changed.
Replacement.

SECTION 4. FACILITY NAME AND LOCATION:

A. **Name.** Fill in the facility's official or legal name.
B. **Street Address.** Self Explanatory.
C. **Latitude.** Enter the facility's latitude (all latitudes assume North Except for American Samoa).
D. **Longitude.** Enter the facility's longitude (all longitudes assume West except Guam).
E. **Township/Range.** Fill in the complete township and range. The first 3 spaces are numerical and the fourth is a letter (N,S,E,W) specifying a compass direction. A township is North or South of the baseline, and a range is East or West of the principal meridian (e.g., 132N, 343W).
F. **City/Town.** Self Explanatory.
G. **State.** Insert the U.S. Postal Service State abbreviation.
H. **Zip Code.** Insert the five digit zip code plus any extension.

SECTION 4. FACILITY NAME & LOCATION (CONT'D.):

I. **Numeric County Code.** Insert the numeric county code from the Federal Information Processing Standards Publication (FIPS Pub 6-1) June 15, 1970, U.S. Department of Commerce, National Bureau of Standards. For Alaska, use the Census Division Code developed by the U.S. Census Bureau.
J. **Indian Land.** Mark an "x" in the appropriate box (Yes or No) to indicate if the facility is located on Indian land.

SECTION 5. LEGAL CONTACT:

A. **Type.** Mark an "x" in the appropriate box to indicate the type of legal contact (Owner or Operator). For wells operated by lease, the operator is the legal contact.
B. **Name.** Self Explanatory.
C. **Phone.** Self Explanatory.
D. **Organization.** If the legal contact is an individual, give the name of the business organization to expedite mail distribution.
E. **Street/P.O. Box.** Self Explanatory.
F. **City/Town.** Self Explanatory.
G. **State.** Insert the U.S. Postal Service State abbreviation.
H. **Zip Code.** Insert the five digit zip code plus any extension.
I. **Ownership.** Place an "x" in the appropriate box to indicate ownership status.

SECTION 6. WELL INFORMATION:

A. **Class and Type.** Fill in the Class and Type of injection wells located at the listed facility. Use the most pertinent code (specified below) to accurately describe each type of injection well. For example, 2R for a Class II Enhanced Recovery Well, or 3M for a Class III Solution Mining Well, etc.
B. **Number of Commercial and Non-Commercial Wells.** Enter the total number of commercial and non-commercial wells for each Class/Type, as applicable.
C. **Total Number of Wells.** Enter the total number of injection wells for each specified Class/Type.
D. **Well Operation Status.** Enter the number of wells for each Class/Type under each operation status (see key on other side).

CLASS I Industrial, Municipal, and Radioactive Waste Disposal Wells used to inject waste below the lowermost Underground Source of Drinking Water (USDW).

TYPE	1I	Non-Hazardous Industrial Disposal Well.
	1M	Non-Hazardous Municipal Disposal Well.
	1H	Hazardous Waste Disposal Well injecting below the lowermost USDW.
	1R	Radioactive Waste Disposal Well.
	1X	Other Class I Wells.

CLASS II Oil and Gas Production and Storage Related Injection Wells.

TYPE	2A	Annular Disposal Well.
	2D	Produced Fluid Disposal Well.
	2H	Hydrocarbon Storage Well.
	2R	Enhanced Recovery Well.
	2X	Other Class II Wells.

CLASS III Special Process Injection Wells.

TYPE	3G	*In Situ* Gassification Well
	3M	Solution Mining Well.

CLASS III (CONT'D.)

TYPE	3S	Sulfur Mining Well by Frasch Process.
	3T	Geothermal Well.
	3U	Uranium Mining Well.
	3X	Other Class III Wells.

CLASS IV Wells that inject hazardous waste into/above USDWs.

TYPE	4H	Hazardous Facility Injection Well.
	4R	Remediation Well at RCRA or CERCLA site.

CLASS V Any Underground Injection Well not included in Classes I through IV.

TYPE	5A	Industrial Well.
	5B	Beneficial Use Well.
	5C	Fluid Return Well.
	5D	Sewage Treatment Effluent Well.
	5E	Cesspools (non-domestic).
	5F	Septic Systems.
	5G	Experimental Technology Well.
	5H	Drainage Well.
	5I	Mine Backfill Well.
	5J	Waste Discharge Well.

MI0013211

TABLE 3

GROUNDWATER PERFORMANCE MONITORING RESULTS
EAGLEPICHER - WOLVERINE GASKET
INKSTER, MICHIGAN

Well	Date		Benzene	Toluene	Ethylbenzene	Xylene (total)	Chlorobenzene
MW-1	June 18, 2004	µg/L	20,000	ND	ND	ND	3,400
MW-1	September 20, 2005	µg/L	24,000	ND	ND	ND	2,000
MW-2	June 18, 2004	µg/L	ND	7,500	370	1,400	8,500
MW-2	February 16, 2005	µg/L	ND	610	160	480	3,200
MW-2	September 20, 2005	µg/L	ND	36,000	2,800	11,000	75,000
MW-3	June 17, 2004	µg/L	8,700	ND	620	1,400	14,000
MW-3	February 16, 2005	µg/L	670	11 J	25	33 J	630
MW-3	September 20, 2005	µg/L	11,000	ND	97 J	ND	4,900
MW-7	June 18, 2004	µg/L	14,000	9,000	4,200	15,000	86,000
MW-7	February 16, 2005	µg/L	4,400	6,500	2,000	7,500	43,000
MW-7	September 20, 2005	µg/L	27,000	14,000	5,300	22,000	110,000
MW-8	June 18, 2004	µg/L	59	190	ND	74	650
MW-8	February 16, 2005	µg/L	1	12	2	6	24
MW-8	September 20, 2005	µg/L	7	1.2 J	6	21	180
MW-9	June 17, 2004	µg/L	44,000	ND	ND	ND	8,600
MW-9	February 16, 2005	µg/L	35,000	ND	ND	ND	6,000
MW-9	September 20, 2005	µg/L	37,000	ND	ND	ND	4,800
MW0-01	June 17, 2004	µg/L	ND	ND	ND	ND	6
MW0-01	September 20, 2005	µg/L	ND	ND	ND	ND	0.36 J
MW0-02	June 17, 2004	µg/L	ND	ND	ND	ND	42
MW0-02	September 20, 2005	µg/L	ND	3.7 J	6.0 J	ND	800
MW0-03	June 17, 2004	µg/L	ND	ND	ND	ND	ND
MW0-03	September 20, 2005	µg/L	ND	ND	ND	ND	0.21 J

Note: Analytical results are preliminary

J = Estimated Result. Result is less than Report Limit.

November 5, 2004 - November 10, 2004: Injections of Fenton's Reagent in highly impacted areas and hydrogen peroxide in less impacted area

September 13, 2005 - Utilizing a vacuum truck, vacuum water and vapors from MW-7, MW-9, and several injection wells (<100 gallons total volume)

MI0013212