

Modification of the Administrative Order for Response Activity
Former Standard Tube Company Facility
24400 Plymouth Road, Redford Township, Wayne County, Michigan
MDEQ Docket No. AO-RRD-03-001

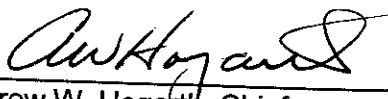
Paragraph 5.1(b)(i) of the Administrative Order for Response Activity (Order) is deleted and replaced in its entirety as follows:

For a two (2)-month monitoring period starting during the week of December 15, 2003, the oil/water separator shall be sampled and analyzed weekly for the parameters listed in Attachment B of the Order. Samples shall be taken before the water flows over the weir and shall reflect the discharge to the surface water. At least one of the sampling rounds shall be within twenty-four (24) hours after a storm event of at least one-tenth of an inch over a 24-hour period. If the results of sampling required by this paragraph show no confirmed exceedances of the water quality standards for the contaminants contained in Attachment B of this Order during the two-month weekly monitoring period, sampling and analysis of the surface water discharge from the oil/water separator for the parameters listed in Attachment B of the Order may be reduced to monthly on an ongoing basis until modified by the MDEQ-approved RAP or receipt of an NPDES surface water discharge permit. Sample data shall be provided to the MDEQ within fourteen (14) days of the date of the sample event during the initial two-month monitoring period, and within thirty (30) days of the sample event if sampling frequency is reduced to monthly. If after twelve (12) months of monthly sampling there are no exceedances of the discharge limits in Attachment B of the Order, Quanex may petition the MDEQ to reduce sampling frequency, and the Order may be modified upon MDEQ concurrence.

If a confirmed exceedance for one or more of the contaminants listed in Attachment B of the Order occurs at any time and is determined to be significant by the MDEQ, Quanex is required to install a groundwater treatment system for all the groundwater going to the current oil/water separator within six (6) months of notice from the MDEQ that the confirmed exceedance is considered significant. The groundwater treatment system shall be operated on an ongoing basis to prevent unacceptable discharges to the surface water, and meet the water quality standards for the contaminants contained in Attachment B of the Order, until the system is modified by implementation of the MDEQ-approved RAP or the MDEQ determines that terminating operation of the system is consistent with the anticipated remedial action.

All other aspects of the Order as originally issued on August 7, 2003, remain in full force and effect.

This modification shall take effect February 9, 2004.



Andrew W. Hogarth, Chief
Remediation and Redevelopment Division
Michigan Department of Environmental Quality

Approved as to form:



Robert P. Reichel [P31878]
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and Agriculture Division
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