

Second 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), as modified, is deleted and replaced in its entirety as follows:

As of the effective date of this Second Modification of the Administrative Order for Response Activity, Respondent shall commence monitoring as provided in the Modified Attachment B. Monitoring data shall be reported in the IRA Progress Report as provided in Paragraph 5.2 of the Order.

Within six (6) months of the effective date of this Second Modification of the Administrative Order for Response Activity, Respondent shall meet the interim cleanup criteria at the oil/water separator (Monitoring Point 001A through Outfall 1) contained in the Modified Attachment B of the Order in a manner that does not exacerbate current environmental conditions at the Facility. The monitoring location referenced in Modified Attachment B shall be before the water flows over the weir and shall reflect the discharge to the surface water.

Paragraph 5.2(c) of the Order is amended to extend the deadline for submittal of the Remedial Action Plan (RAP) as follows:

Within twelve (12) months after Respondent's receipt of the MDEQ's comments on the Preliminary Submittal described above, Respondent shall submit a RAP for the Facility to the MDEQ for review and approval.

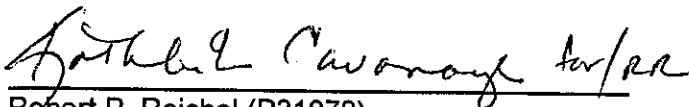
All other aspects of the Order as originally issued on August 7, 2003, remain in full force and effect.

This modification shall take effect September 30, 2005.



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

Approved as to form:



Robert P. Reichel (P31878)  
Assistant Attorney General  
Environment, Natural Resources, and  
Agriculture Division  
Michigan Department of Attorney General

**Modified Attachment B**  
**Administrative Order for Response Activities**  
**Former Standard Tube Company Facility**  
**MDEQ Docket No. AO-RRD-03-001**

**1. Interim Cleanup criteria, Monitoring Point 001A**

The Respondent is authorized to an unspecified amount of treated storm water and groundwater seepage from Monitoring Point 001A through Outfall 001. Outfall 001 discharges to the Rouge River via Prindle Drain and Livonia-Ashcroft Drain. Such discharge shall be limited and monitored by the Respondent as specified below.

<u>Parameter</u>	<u>Maximum Allowable for Quantity or Loading</u>			<u>Maximum Allowable for Quality or Concentration</u>			<u>Frequency of Analysis</u>	<u>Sample Type</u>
	<u>Monthly</u>	<u>Daily</u>	<u>Units</u>	<u>Monthly</u>	<u>Daily</u>	<u>Units</u>		
Flow	(report)	(report)	MGD	---	---	---	Daily	Report Total Daily Flow
Total Lead	2.5	(report)	lbs/day	190	(report)	µg/l	Weekly	24-Hr Composite
Total Silver	0.0062	(report)	lbs/day	0.46	(report)	µg/l	Weekly	24-Hr Composite
Total Zinc	0.72	(report)	lbs/day	54	(report)	µg/l	Weekly	24-Hr Composite
Total Polychlorinated Biphenyls (PCBs)	$3.5 \times 10^{-7}$	(report)	lbs/day	0.000026	(report)	µg/l	Weekly	24-Hr Composite
Whole Effluent Toxicity								
Acute Toxicity	---	---	---	---	1.0	TU <sub>A</sub>	Monthly	24-Hr Composite
Chronic Toxicity	---	---	---	1.5	---	TU <sub>C</sub>	Monthly	24-Hr Composite
Total Copper	---	(report)	lbs/day	---	(report)	µg/l	Monthly	24-Hr Composite
Outfall Observation	(report)	---	---	---	---	---	See Part I.A.1.c.	Visual

The receiving water shall contain no unnatural turbidity, color, oil films, floating solids, foams, settleable solids, suspended solids, or deposits as a result of this discharge.

Monitoring Location

Samples, measurements, and observations taken in compliance with the monitoring requirements above shall be taken prior to discharge to the Prindle Drain.

Outfall Observation

The outfall observation shall be conducted weekly during dry weather and daily during periods of snow melt or storm water runoff. Any unusual characteristics of the discharge (i.e., unnatural turbidity, color, oil film, floating solids, foams, settleable solids, suspended solids, or deposits) shall be reported within 24 hours to the MDEQ followed with a written report within five days detailing the findings of the investigation and the steps taken to correct the condition.

Target Detection Limit for Total Copper

The target detection limit for total copper shall not exceed 1.0 µg/l unless a higher level is appropriate because of sample matrix interference. Justification for higher quantification levels shall be submitted to the MDEQ within 30 days of such determination. Upon approval of the MDEQ, the Respondent may use alternate analytical methods (for parameters with methods specified in 40 CFR 136, the alternate methods are restricted to those listed in 40 CFR 136).

Target Detection Limits for PCBs

The sampling procedures, preservation and handling, and analytical protocol for compliance monitoring for total PCBs shall be in accordance with EPA Method 608. The Target Detection Limit (TDL) shall be 0.2 µg/l unless a higher level is appropriate because of sample matrix interference. Justification for higher TDLs shall be submitted to the MDEQ within 30 days of such determination.

Any discharge of total PCBs at or above the TDL specified in this Order is a specific violation, and may subject the Respondent to civil penalties under state or federal law. If an interim cleanup criteria sample is less than the TDL, the Respondent will be considered to be in compliance with the total PCBs interim cleanup criteria set forth in this Order for the period that the sample represents. For the purpose of determining if an interim cleanup criteria sample is less than the TDL, total PCBs shall be defined as the sum of the individual analytical results for each of the aroclors 1016, 1221, 1232, 1242, 1248, 1254, and 1260 with any aroclor result less than the TDL being treated as a zero. For the purpose of reporting, the Respondent shall calculate concentration and loading levels of total PCBs in this same manner; however, the result of any individual aroclor measurement less than the TDL but greater than the detection level shall be reported as a Daily Concentration. This paragraph does not authorize the discharge of total PCBs at levels which are injurious to the designated uses of the waters of the state or which constitute a threat to the public health or welfare.

Whole Effluent Toxicity Requirements

Test species shall include fathead minnow and either *Daphnia magna* or *Ceriodaphnia dubia*. Testing and reporting procedures shall follow procedures contained in EPA/600/4-91/002, "Short-Term Methods for Estimating the Chronic Toxicity of Effluents and Receiving Waters to Freshwater Organisms," for fathead minnow and *Ceriodaphnia*, and ASTM E1193-97 "Standard Guide for Conducting *Daphnia magna* Life-Cycle Toxicity Tests" for *D. magna* as modified by the Water Bureau ("WD modifications to ASTM E1193-97"). The acute toxic unit value (TU<sub>A</sub>) and chronic toxic unit value (TU<sub>C</sub>) for each species tested shall be reported in the Quarterly IRA Progress Reports. If multiple chronic toxicity tests for the same species are performed during the month, the maximum TU<sub>A</sub> value and monthly average TU<sub>C</sub> value for the species shall be reported. The Respondent shall indicate each species not tested in its IRA Progress Reports. Completed toxicity test reports for each test conducted shall be submitted for review by the MDEQ. After one year of toxicity testing and upon approval of the MDEQ, the monitoring frequency may be reduced if the test data indicate that the toxicity requirements of Rule 323.1219 of the Michigan Administrative Code are consistently being met. After one year of toxicity testing and upon approval of the MDEQ, the chronic toxicity tests may be performed using the more sensitive species identified in the chronic toxicity database. If a more sensitive species cannot be identified, the chronic toxicity tests shall be performed with both species. Toxicity test data acceptability is contingent upon the validation of the test method by the testing laboratory.

Chemical Specific Toxicity Testing

Prior to installation of the groundwater treatment system, the Respondent shall submit to the MDEQ the following Tier II toxicity information for chrysene and pyrene: 1) the results of a 48-hour LC<sub>50</sub> or EC<sub>50</sub> for a North American planktonic crustacean (either *Ceriodaphnia* species, *Daphnia* species or *Simocephalus* species), 2) the results of a toxicity test for one other North American freshwater aquatic species (other than a planktonic crustacean) that meets a minimum requirement of Rule 323.1057(2)(a) of the Water Quality Standards, and 3) the results of a "no observable adverse effect level (NOAEL)" developed from a repeated dose study, using mammals, which is not less than 28 days in duration. Procedures for the aquatic toxicity testing shall follow ASTM, Standard E 729-88a titled "Standard Guide for Conducting Acute Toxicity Tests with Fishes, Macroinvertebrates, and Amphibians." Procedures for conducting mammalian toxicity testing shall follow EPA TSCA Health Effects Testing Guidelines (59 FR 39397, 9/27/85). Alternate testing procedures may be used upon approval of the MDEQ. All testing shall conform with the data quality requirements described in Rule 323.1057 of the Water Quality Standards. Sufficient documentation shall be provided with the test results to demonstrate conformance with the specified method.

The Respondent may submit additional mammalian and/or aquatic toxicity data, as appropriate, to reduce the uncertainty factor used in the development of Tier II values or to allow for calculation of Tier I values. Prior to conducting any additional toxicity testing, the Respondent should contact the MDEQ to determine the appropriate test organism(s).

This data shall be submitted to the MDEQ with the first IRA Progress Report. Upon review of this data, the interim cleanup criteria may be modified in accordance with applicable laws and rules.