

Fourth 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 (the "Order")

**Whereas**, Quanex has a legal obligation to implement a remedial action for the Facility that fully complies with Part 201 of the NREPA<sup>1</sup>;

**Whereas**, the Michigan Department of Environmental Quality (MDEQ) has been in numerous discussions with Quanex during the pendency of the Order;

**Whereas**, the MDEQ has incurred response activity costs for which Quanex has settled under a separate Administrative Order by Consent, No. AOC-RRD-08-01;

**Whereas**, the MDEQ desires to minimize further transaction costs associated with this project given the limited available state resources and remaining risks associated with the Facility;

**Therefore**, the following modifications to the Order shall take effect upon the date of the Remediation and Redevelopment Division Chief's signature.

A. The following shall be added to Section III (Definitions) of the Order:

3.18 "IRDC" or "IRDC plan" means an interim response designed to meet applicable cleanup criteria at the Property as provided for under Section 20120a(1)(a) to (e) of the NREPA for one or more environmental media in all or a portion of the facility as provided in the Part 201 Administrative Rules, including, but not limited to, Rule 526 and Rule 705.

B. The current Section 3.18 of the Order shall be renumbered to be Section 3.19.

C. Except in Section III (Definitions), the term "RAP" shall be replaced with "IRDC" in the Order.

D. All uses of the term "Facility" in Section V (Order) of the Order shall be replaced with "Property."

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<sup>1</sup> Part 201, Environmental Remediation, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (NREPA).

E. The requirements in Paragraph 5.1(a) have been fulfilled for the purposes of proposing an IRDC plan that complies with Paragraph 5.1(c), as amended, except for the area at and around the underground storage tank and PZ-1 and PZ-5. Additional monitoring points may be necessary as part of the monitoring plan in the IRDC.

The requirements in Paragraphs 5.1(b)(ii) and (iii) have been fulfilled for the purposes of an interim response activity under this Order. The IRDC shall incorporate what actions have been taken and will be taken to fulfill the performance standards in Paragraph 5.1(c), as amended, including a schedule for those actions and a mechanism to ensure the building foundation remains in place or that, if it is removed, that notice be given and that Quanex takes appropriate action to address impacts beneath the building,

F. Paragraph 5.1(c) of the Order is deleted and replaced in its entirety as follows:

- (c) IRDC plan performance objectives are to address all releases of hazardous substances in all environmental media at the Property in a manner that, when implemented, will achieve and maintain complete status as defined in Rule 101(e) of the Part 201 Administrative Rules. This includes, but is not limited to, the following:
  - (i) Identifying which of the pathways, risks, and conditions provided in Rule 532(7) of the Part 201 Administrative Rules are relevant for the Property, including an analysis of source control measures as required by Section 20118(8) of the NREPA.
  - (ii) Documenting that the cleanup criteria in the IRDC are appropriate to the Property, including, but not limited to, land use, activity patterns anticipated at the Property, and identification of any wellhead protection zone that may be affected.
  - (iii) Identifying the category or categories of cleanup criteria that are being proposed or relied upon at the Property.

- (iv) Assuring that, when implemented, the effectiveness and integrity of the remedial action is provided for in the MDEQ-approved IRDC, including, but not limited to:
  - (a) If Respondent chooses to abandon the oil/water separator in its IRDC plan, this action must not: (1) cause a violation in the property storm water permit, (2) flood the building, or (3) spread or mobilize free product beyond the footprint of the building on the Property.
  - (b) Conduct a thorough one-time cleanout of materials in the drain pipe leading to the Prindle Drain.
  - (c) Exceedances of GSI criteria shall be eliminated, and the IRDC plan shall include groundwater monitoring for GSI exceedances into surface waters on the Property, including, but not limited to, the Probst and Prindle Drains. Respondent may seek a mixing zone determination for GSI compliance criteria.
  - (d) The IRDC plan shall contain a contingency plan to address any GSI exceedances that may occur at the Property.
  - (e) Design and documentation of an engineered direct contact exposure barrier on the DTE Energy portion of the Property.
  - (f) Abandonment of the cooling well.
  - (g) Complete and submit notices of migration, as necessary.
- (v) Obtaining all necessary permits, if applicable.
- (vi) Documenting that, when implemented, the identified remedial objective can be achieved by meeting the cleanup criteria established under

Section 20120a of the NREPA, and complying with all applicable technical and administrative requirements of Sections 20118, 20120a, 20120b, and 20120d of the NREPA, and the Part 201 Administrative Rules at the Property.

- (vii) Allowing for the continued use of the Property consistent with local zoning.

G. Paragraph 5.2(c) of the Order is deleted and replaced with the following to extend the deadline for submittal of the IRDC plan as follows:

- (c) By June 30, 2008, Respondent shall submit an IRDC for the Property to the MDEQ for review and approval. The IRDC shall meet the performance objectives in Paragraph 5.1 of this Order, as modified, including a detailed schedule for implementation of the response activities contained in the IRDC, and any engineering design plans and construction plans necessary to implement the response activity. The IRDC shall be subject to the MDEQ review and approval in accordance with Section XI (Submissions and Approvals).

H. Paragraph 10.1 of the Order is modified to change the MDEQ Project Coordinator as follows:

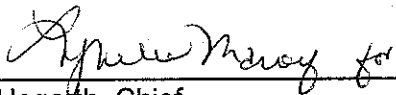
The MDEQ Project Coordinator shall be Karen Williams, who can be contacted as follows:

Ms. Karen Williams, Project Coordinator  
Remediation and Redevelopment Division  
Southeast Michigan District Office  
Michigan Department of Environmental Quality  
27700 Donald Court  
Warren, Michigan 48092  
Telephone: 586-753-3884  
Facsimile: 586-753-3859


I. The first line of Section XIII (Amendments/Modifications/Incorporation by Reference) shall be amended to read:

This Order may only be amended in writing by signature of the Director of the MDEQ or his/her designee.

All other aspects of the Order as originally issued on August 7, 2003, as amended on February 9, 2004, September 30, 2005 and October 27, 2006, remain in full force and effect.

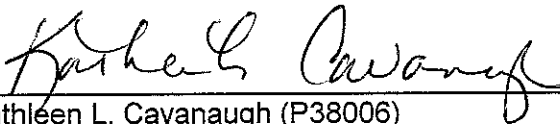


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Andrew W. Hogarth, Chief  
Remediation and Redevelopment Division  
Michigan Department of Environmental Quality

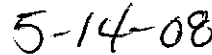


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Date

Approved as to form:



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Kathleen L. Cavanaugh (P38006)  
Assistant Attorney General  
Environment, Natural Resources, and  
Agriculture Division  
Michigan Department of Attorney General



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Date