

Environmental Management Plan

Detroit Metropolitan Airport Wayne County Airport Authority

July 24, 2014

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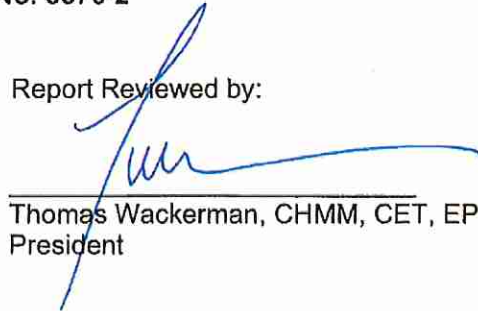
ASTI Project No. 8576-2

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**ENVIRONMENTAL MANAGEMENT PLAN
DETROIT METROPOLITAN AIRPORT
WAYNE COUNTY AIRPORT AUTHORITY
JULY 24, 2014**

1.0 INTRODUCTION

ASTI Environmental (ASTI) was retained by the Wayne County Airport Authority (WCAA), to prepare this Environmental Management Plan (EMP) for DTW, located in Romulus, Michigan (Property). This EMP contains procedures and guidelines to protect personnel who may encounter impacted soils and/or groundwater during site maintenance, construction, and other invasive activities. A Property Location Map is provided as Figure 1.

DTW is a 6,700 acre operating commercial airport located in Romulus, Michigan and operated by the WCAA. The Property has a long history of aviation and related activities. Some of these activities involved the use or storage of hazardous substances in above ground tanks, underground tanks, tanker trucks, equipment, and containers. As a result of this historical use, impacts to the environment have occurred at some sites and are suspected to have occurred at other sites. DTW has taken, and will continue to take, precautions to minimize impacts to the environment, and to address impacts as they are identified. As part of its continuing commitment to environmental stewardship, this EMP will provide guidelines for personnel conducting activities at DTW concerning the proper handling and disposal of soils and groundwater impacted from both historical and current airport operations.

The objective of this EMP is to provide information to airport and support staff to successfully implement the following tasks.

- a. Identify and communicate historical impacts to soils or groundwater.
- b. Undertake measures as necessary to prevent exacerbation of historical contamination.
- c. Exercise due care at locations with historical releases by undertaking response activities necessary to mitigate unacceptable human exposure to hazardous substances, mitigate fire and explosion hazards due to hazardous substances, and allow for the intended use of the facility in a manner that protects the public health and safety and the environment.
- d. Take precautions against the reasonably foreseeable acts or omissions of a third party and the consequences that foreseeably could result from those acts or omissions when conducted in areas of historical impacts.

- d. Take precautions against the reasonably foreseeable acts or omissions of a third party and the consequences that foreseeably could result from those acts or omissions when conducted in areas of historical impacts.
- e. Comply with land use or resources use restrictions established or relied on in connection with previous response activities undertaken at the property.
- f. Not impede the effectiveness or integrity of any land use or resource use restriction employed at the property in connection with response activities.

This EMP is limited to management of historical impacts to soils or groundwater that exceed residential closure criteria. It is not intended to provide guidance for emergency response or environmental compliance.

2.0 CHARACTERISTICS OF PROPERTY USE

2.1 Historical Uses of the Property

The Property contains sites that are currently used by WCAA and tenants (Air Lines, rental car facilities, fixed-based operators, food preparation facilities, ground service handlers, and other businesses). Activities conducted on the sites may have included the use of hazardous substances and these substances may have been stored in underground storage tanks (USTs), above ground storage tanks (ASTs), containers, tanker trucks, and/or equipment. Historical releases from these containers, or due to activities conducted at the sites may have impacted subsurface soil and groundwater. The DTW property contains areas where historical impacts have been mitigated, where historical impacts have been left in place using land and/or resource use restriction or engineered controls, and where historical impacts may have occurred but have not been identified. Each of these sites is described in Section 4.0.

Table 1 contains a list of the sites with known or suspected historical impacts. Figure 2 indicates the approximate location of each site with known or suspected historical impacts. Table 2 contains a list of sites that have been closed by MDEQ at clean-up levels that do not require further action or attention.

2.2 Current and Proposed Uses of the Property

The Property is currently an operating commercial airport located in Romulus Michigan. There are no proposed use changes at the sites identified. In the event of a use change for any site, procedures in this EMP will be implemented and this EMP will be modified by the WCAA Environmental Unit to reflect those changes.

2.3 Existing Infrastructure Features

The airport was initially developed in the late 1920's with the first official landing taking place in 1930. The airport has continued to grow since that time and now operates six runways ranging in length from 8,500 to 12,000 feet. Numerous major development projects have been completed at DTW, the most recent being the construction and opening of the North Terminal in 2008. Potable water is supplied by the City of Romulus (with DTW as a "bulk" customer), and sanitary sewer is supplied by Wayne County and the City of Detroit. Refer to Figure 1, Property Location Map, for the location of the Property.

2.4 Proposed Construction Activities

Construction activities are on-going at the airport and thus this EMP cannot identify specific activities or areas of the property where construction will be conducted. Therefore, this EMP was prepared to address construction activities anywhere on the property, with specific emphasis for activities within Sites of Known Impacts and Sites of Environmental Concern.

3.0 PLAN OBJECTIVES

This section describes the overall objectives of the EMP.

3.1 Due Care Requirements

The EMP will satisfy, to the extent practical, Due Care requirements to protect the public health and safety associated with Part 201 of Michigan Act 451. Based on the current and anticipated uses of site(s) selected for development, due care will be exercised by all personnel undertaking activities that could disturb the sites outlined in Section 4.0. These activities will include proper notification to appropriate personnel of potential risks prior to initiating any excavation or construction activities, acknowledgement of the potential risks associated with work planned for the site, and if necessary, a site-specific health and safety plan. A copy of the form to be used to acknowledge these Due Care requirements is presented in Appendix B.

3.2 Reasonable Precautions

This EMP contains precautions that should be taken to prevent reasonably foreseeable acts or omissions of WCAA staff, contractors, or third parties (i.e. utility workers) and the consequences that could result from those acts or omissions. This EMP will be reviewed with third parties who intend to perform subsurface work at the sites listed in Section 4.0, or those who may come in contact with subsurface soils to prevent unacceptable exposures and allow for proper soil management, as applicable. A Site-Specific Health and Safety Plan may be required before work is authorized to begin. An example Site-Specific Health and Safety Plan is presented in Appendix C.

3.3 Prevention of Exacerbation

This EMP is intended to prevent activities at Sites of Known Contamination and Sites of Environmental Concern, as defined in Sections 4.1 and 4.2 that could exacerbate existing contamination. To assure that exacerbation does not occur, the following activities will be conducted:

- Surfacing materials will be maintained as an engineered control, and if removed or replaced, must be replaced according to a site-specific work plan approved by the WCAA Environmental Unit.
- Soils and landscaping materials will remain in place as an engineered control, and if removed or replaced, must be replaced according to a site-specific work plan approved by the WCAA Environmental Unit.

3.4 Use Restriction Compliance

Sites that currently have deed restrictions or restrictive covenants in place are listed in Section 4.1.2 and the use restrictions associated with these documents are shown in Appendix E. Adherence to this EMP will prevent agreements made as part of these deed restrictions from being disregarded.

3.5 Exposure Pathway Evaluation

The analysis of potential human exposure pathways is based on existing conditions at the various sites. DTW is a dynamic facility and new projects, maintenance and repair activities, and other on-site activities may have the potential to cause human exposure to contaminated soils and/or groundwater. Accordingly, this Plan has been developed to assist WCAA with the management of their Michigan Part 201 obligations at DTW during operation of the airport, including maintenance or repair activities and new construction in the areas of known or suspected contamination.

The primary exposure pathways of concern that have been identified at the property are listed below:

- Soil Volatilization to Indoor Air Inhalation
- Soil Direct Contact
- Soil Volatilization to Ambient Air

Due to the presence of an at least 40 foot thick clay layer underlying the airport and the availability of municipal water, no groundwater pathways are considered complete at the various sites noted in Section 4. Therefore, hazardous substances identified at the various Sites of Known Contamination should be compared to the MDEQ's Part 201 Generic Non-Residential Cleanup Criteria and Screening Levels for soils. These must be communicated to any workers, contractors or other DTW/WCAA personnel prior to initiating excavation or construction activities at sites listed in Section 4.0.

4.0 CONTAMINATED SITE INFORMATION

The following subsections provide a summary of the various sites of known or suspected contamination on the property, an evaluation of exposure pathways, and an evaluation of known or potential exposures at each site. Refer to Table 1 and Figure 2 for a summary of known or suspected contaminated sites presently identified at DTW.

4.1 Sites of Known Contamination

4.1.1 Open LUST Sites

The majority of the contaminated sites identified at the airport are open leaking underground storage tank (LUST) sites. These sites contain soil contamination at concentrations exceeding one or more of the Generic Residential Clean-up Criteria and are regulated under Part 213 of Michigan Act 451 and all activities at these sites must comply with those regulations. A list of these sites is presented below and a Site Summary Sheet highlighting the available information known for each of these sites is shown in Appendix A:

Open LUST Sites

- Site No. L1: Former TWA Gate C-2 at the Davey Terminal (demolished in 2002).
- Site No. L2: North Terminal Construction (Former Davey Terminal Concourse Gate E-8)
- Site No. L3: Former BP Service Station
- Site No. L4: Delta Air Lines Cargo Building (Formerly Northwest Air Lines Cargo Building)
- Site No. L5: National / Alamo Rental Car Facility
- Site No. L6: Dollar Rental Car Facility
- Site No. L7: Former Delta Air Lines Fuel Farm
- Site No. L8: Former FAA Radar Site

4.1.2 Deed Restricted LUST Sites

Some sites have been remediated, but deed restrictions still apply. These sites are regulated under Part 213 of Michigan Act 451 and all activities at these sites must comply with those regulations. A list of these sites is presented below and the use restrictions associated with these documents are shown in Appendix E.

Deed Restricted Sites with Identified Impacts

- Site No. D1: Signature Flight Support (Deed Restricted LUST Closure)
- Site No. D2: FedEx – DTW, Building 714 (Deed Restricted LUST Closure)

4.1.3 Sites with Environmental Impact

Environmental impacts are known to exist at one site that is not regulated as a LUST or UST site. This site is regulated under Part 201 of Michigan Act 451 and all activities at this site must comply with those regulations. The site is presented below:

Sites with Environmental Impacts

- Site No. D3: Powerhouse (historical fuel oil release(s))

4.2 Sites of Environmental Concern

Historical operations at four sites indicate that hazardous substances may have been used, and therefore impacts may exist. These sites may require additional investigation to determine the nature and/or extent of impacts. These sites are regulated under Part 201 of Michigan Act 451 and all activities at these sites must comply with those regulations. The sites are presented below:

Sites of Environmental Concern

- Site No. D4: Abandoned Delta Air Lines Glycol Fuel Farm
- Site No. D5: K-15 Island Fuel Line Release
- Site No. D6: United Air Freight & US Air Maintenance, Building 513
- Site No. D7: Former DTW Fire Training Area

4.3 Closed Sites

Numerous underground storage tank systems have been removed at DTW and received "clean" closures from the MDEQ, indicating that no additional clean-up or monitoring activities are required, based on the information provided to MDEQ. These sites are shown on Figure 2 and summarized in Table 2.

5.0 PLAN IMPLEMENTATION

This section documents the elements of the EMP that will be implemented by the WCAA.

5.1 Identification and Communication of Historical Impacts

DTW will maintain a List of Sites of Known Contamination and Sites of Environmental Concern. The current list is included as Table 1 of this EMP. New entries to this list will include at least the name and location of the site, a unique identification number, the known or suspected impacts, the date of the release or discovery, and whether there are deed restrictions in place. This list will be available on the WCAA Metronet.

DTW will maintain a Map of Sites of Known Contamination and Sites of Environmental Concern. The current map is included as Figure 2 in this EMP. New entries to this map will include the name of the site, the classification as described in this EMP, and a unique identification number. The unique identification number will be the same as used in Table 1. This map will be available on the WCAA Metronet.

DTW will maintain individual site summary sheets for each Site of Known Contamination. The current sheets are included in Appendix A. New site summary sheets will include the name and unique identification number of the site, a description of the site location, a summary of known site information, and a summary of known contaminants present.

Before conducting any subsurface or excavating activities within the sites listed in Section 4.0, a Site-Specific Health and Safety Plan (SSHSP) must be prepared by the entity undertaking the excavation work. This SSHSP will be distributed to all employees and contractors working in the site of interest. A suggested SSHSP outline is attached in Appendix C, but each SSHSP must be customized to address the individual circumstances present at each site.

Environmental contamination identified during maintenance, operation or construction activities should be reported to the WCAA Environmental Unit, communicating the location, suspected or known contaminants, and source, if known. If appropriate, this information will be added to this EMP.

5.2 Soil Management

5.2.1 Soil Management for Sites of Known Contamination

The following soil management practices are required prior to and during soil excavation activity conducted at Sites of Known Contamination, as defined in Section 4.1:

- Excavation contractors must complete the Acknowledgement of Due Care Requirements Form (Appendix B) to acknowledge in writing that a WCAA representative has reviewed with them, or a responsible company official, the available environmental information for the site pertinent to their activities prior to conducting on-site activities.
- Excavation contractors must prepare and submit a Site-Specific Health and Safety Plan (SSHSP). An example SSHSP is shown in Appendix C.
- In the event that impacts are encountered during excavation, unimpacted and impacted soils must be segregated to the extent practical. Separate soil staging areas for unimpacted and impacted soils may be provided within the DTW property boundary. Soil management must be completed according to the procedures shown in Section 5.2.2 below.
- Upon completion of soil excavation activities, the excavation contractor must complete a Documentation of Soil Management Form (Appendix D) for submittal to the WCAA Environmental Unit including all identified attachments.

5.2.2 Soil Management for all Locations within the DTW Property Boundary

The following soil management practices should be implemented during soil excavations conducted at DTW:

- Removal of any soils from DTW for placement on other properties is prohibited without the written approval of the WCAA Environmental Unit.
- In the event that impacts are encountered, unimpacted and impacted soils must be segregated to the extent practical. Separate soil staging areas within the DTW property boundary for unimpacted and impacted soils may be provided in the future. Procedures for accessing and using these areas will be developed when and if these staging areas are developed.
- In the event that impacts are encountered, excavation contractors must promptly notify the WCAA Environmental Unit.

- For new impacts, excavation contractors must present a plan to WCAA personnel which outlines procedures to delineate, separate and manage the impacted and non-impacted materials. The plan needs to be approved by the WCAA Environmental Unit prior to implementation.

5.3 Soil Disposal and Sampling Requirements

All impacted excavated soil will either be transported to an approved on-site designated impacted soil staging area, or transported to an off-site disposal facility. If soils are planned to be removed to an off-site disposal facility, approval from the WCAA is required. Testing may be required to document soil characteristics and provide disposal-facility required information. The contractor must contact the disposal facility for specific disposal documentation requirements.

All unimpacted excavated soils can either be placed back into the original excavation, transported to an approved on-site designated soil staging area for unimpacted soils, used elsewhere at DTW, or transported to an off-site location with WCAA approval.

6.0 Plan Administration Procedures

This section presents the notification and administration procedures that the WCAA will use to communicate the requirements of this EMP to personnel that plan to conduct maintenance, repairs, or construction at Sites of Known Contamination or Environmental Concern.

6.1 WCAA EMP Notification Procedures

To ensure that the requirements of this EMP are known by WCAA staff involved in planning and managing construction projects as well as contractors and third-parties that intend to conduct invasive activities at any of the sites listed in Section 4, the following procedures will be implemented by the WCAA:

- The EMP will be forwarded to all WCAA Departments that are or could be involved in the planning and execution of projects involving the disturbance of soils on DTW property. These Departments include: Capital Projects, Facilities and Infrastructure, Maintenance, Airfield Operations, Security, Police, Airfield Rescue and Fire Fighting, and Business Development and Real Estate. Sign-off will be required by the Director of each of these departments that the EMP has been received and reviewed.
- Review of the EMP will be a requirement of all projects that are submitted for Construction and Alteration Permit issuance as well as internal demolition, rehabilitation, and construction projects conducted by the WCAA.
- If, through the above review process, any proposed project is determined to be within 500 feet of any site listed in the EMP, the Environmental Unit Administrator must be contacted to determine if elements of the EMP need to be implemented.
- The Environmental Unit Administrator will verify that procedures required by the EMP, such as Document of Due Care Forms, On-Site Health and Safety Plans, and Documentation of Soil Management Forms are properly completed.

6.2 Contractor Procedures

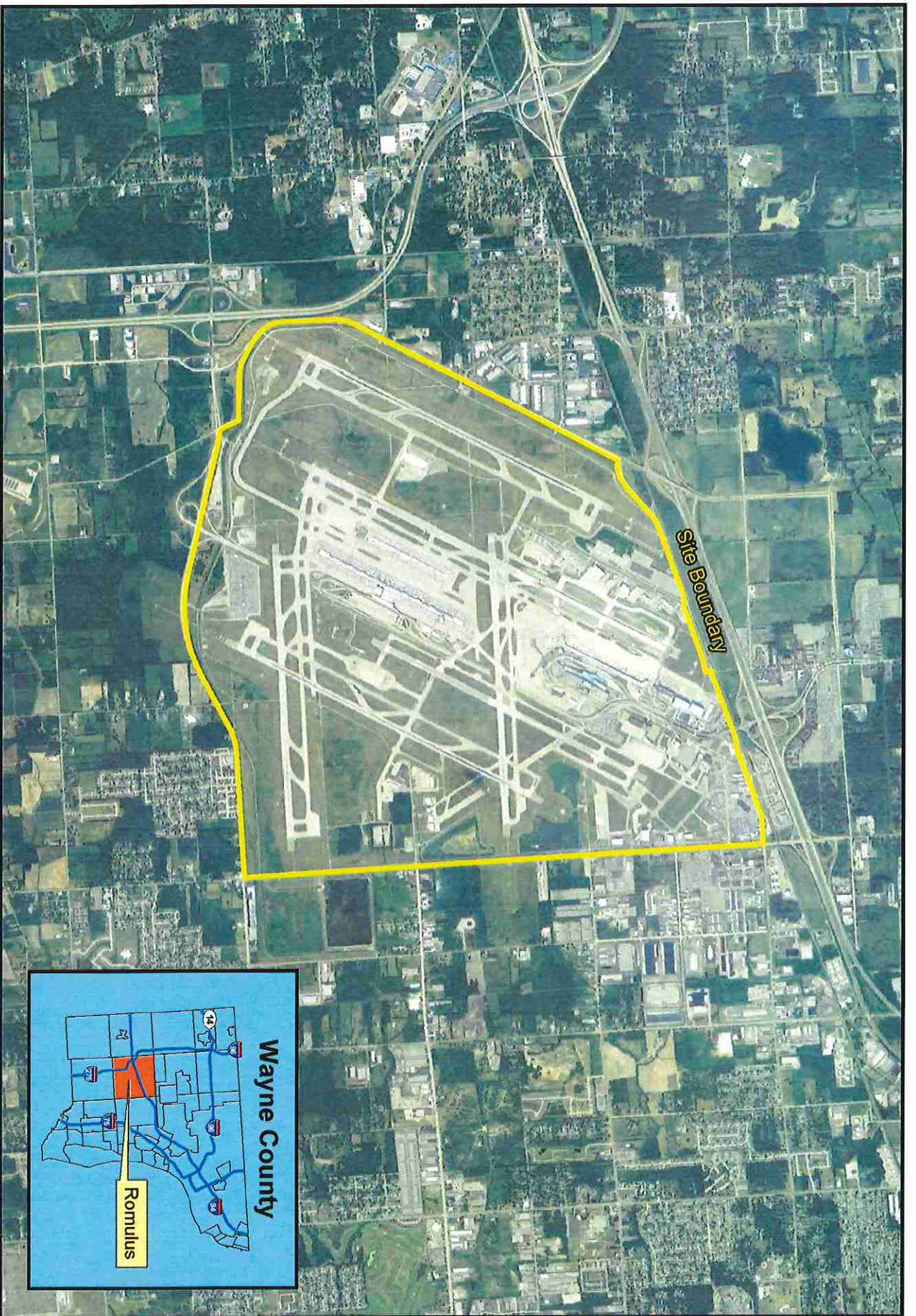
- Contractors and third-parties will be required as part of contract documentation to comply with all on-site requirements of the EMP that affect their projects and for which they have accepted responsibility.
- A management representative of firms employing construction workers, employees or other personnel that have the potential to come in contact with contamination in any of the locations identified in Section 4.0 must acknowledge in writing that they have reviewed with them the available environmental information for the site.
- Contractors and third-parties will be required to submit all documentation required by the EMP to the Environmental Unit Administrator.

6.3 Records Maintenance Procedures

All EMP-related records will be maintained by the Environmental Unit Administrator.

**Environmental Management Plan
Detroit Metropolitan Airport**

FIGURES

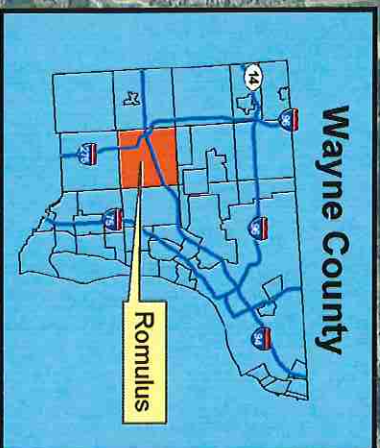


Detroit Metropolitan Airport

Romulus, MI



4,000 Feet



Property Location Map

Created for: Mead & Hunt
Imagery Source: National Agricultural Imagery Program, Image date: 2012
Created by: LJD, January 15, 2014, ASTI Project 8576-2

Environmental Management Plan Detroit Metropolitan Airport

TABLES

**Table 1 - List of Sites of Known Impacts and Sites of Environmental Concern
Detroit Metropolitan Airport**

Site No.	Site Name	Location	Owner	Storage Tank Quantity/Size	Facility ID (Release ID)	Dead Restricted?	Identified Contaminants
L1	Former TVVA Gate C-2, Davey Terminal	Near Current Gate D-3, North Terminal	WCAA	One 1,000-gallon gasoline (removed)	7575 (C-1042-96)	Pending	Petroleum constituents with elevated xylenes and potential free-phase
L2	North Terminal Construction	NWA Gate E2 (Formerly E-8)	Delta Air Lines	One 10,000-gallon gasoline (removed in 2006)	3924 (C-0532-03)	Pending	Petroleum constituents
L3	Former BP Service Station	Former Building 531 Site	Metro Point/WCAA	Four 10,000-gallon gasoline and one 4,000-gallon diesel (removed)	39825 (C-0205-07)	Yes	Petroleum constituents
L4	Delta Cargo	Building 536	Delta Air Lines	Two 500-gallon used oil (removed)	36074 (C-0659-93)	No	Chromium
L5	National Alamo Rental Car	Building 338	Enterprise Leasing	Four 10,000-gallon gasoline, one 6,000-gallon gasoline and two 550-gallon new and used oil	21783 (C-0430-04)	No	Petroleum constituents
L6	Dollar Rental Car	Building 334	DTAG	One 10,000-gallon gasoline	39498 (C-0197-11)	No	Petroleum constituents
L7	Delta Air Lines Fuel Farm	North of Building 614	Delta Air Lines	Seventeen 30,000-gallon Jet A, one 20,000 gasoline, one 10,000 waste Jet A, one 10,000 gallon waste oil, one 6,000 gasoline and one 5,000 waste Jet A (Removed in 1989)	Unknown	No	Petroleum constituents
L8	Former FAA Radar Site	West of RWY 4L/22R	FAA	Unknown	Unknown	No	Unknown
D1	Signature Flight Support Fuel Farm	East Service Drive/Goddard Rd.	Signature	Four 30,000-gallon kerosene (removed)	11450 (C-0985-99)	Yes	Petroleum constituents
D2	FedEx - DTW	Building 714	FedEx	Two 10,000-gallon gasoline and one 10,000-gallon diesel (removed)	18540 (C-0709-99)	Yes	Petroleum constituents
D3	Powerhouse	Building 611	WCAA	Two 15,000-gallon fuel oil and two 35,000-gallon fuel oil	Unknown	No	Petroleum Constituents
D4	Old DAL Glycol Fuel Farm	East Service Drive	Delta Air Lines	Three 10,000-gallon	NA	No	Unknown
D5	K-15 Island Fuel Line Release	Airfield	WCAA	N/A	NA	No	Unknown
D6	United Air Freight & US Air Maintenance	Building 513	WCAA	Unknown	Unknown	No	Unknown; petroleum compounds likely
D7	Former DTW Fire Training Burn Pit	Old Superior Road	WCAA	N/A	Unknown	No	Unknown

Table 2 - List of Closed Sites
Detroit Metropolitan Airport

Site #	Site Name	Location	Owner	Quantity/Size	Facility/ID	LUST?	LUSTID	Notes
Clean Closure Part 211/213 UST Sites								
Former Jet Fuel Farms								
1	American Airlines	North of Building 610 (Current Building 614)	American Airlines	(1) 8,000-gallon (2) 4,000-gallon (3) 500-gallon	7566	Yes	C-1519-91	All tanks removed from ground. Thermal soil remediation employed.
2	Northwest Airlines (Concourse F Farm)	Kilo-14 Island	Northwest Airlines/Delta	(4) 30,000-gallon	7792	No	C-0775-96	Documentation on file. All tanks removed from ground.
3	Northwest Airlines (Building 536)	North of Building 536	Northwest Airlines/Delta	(5) 30,000-gallon	19714	Yes	C-1365-99	Documentation on file. All tanks removed from ground. Jet fuel and gasoline.
Clean Closure Part 211/213 UST Sites								
4	Lucas Drive - Building #278	Building 278 (Former DTW Maintenance Bldg.)	DTW	(1) 4,000-gallon	33817	Yes	C-1365-99	Diesel. No closure report on file. Tank removed from ground.
5	Lucas Drive - Budget Building	Building 287	Alamo Rent-A-Car	(1) 10,000-gallon	34707	Yes	C-0795-98	Diesel. No closure report on file. Operational tanks remain on-site.
6	Lucas Drive - Hertz Building	Building 289	Hertz Rent-A-Car	Multiple	34320	Yes	C-0926-98	Dispenser line leak. Operational tanks remain on-site.
7a	Lucas Drive - Avis Building	Building 295	Avis Rent-A-Car	Gasoline	16451	Yes	C-1616-93	Leaking dispenser. Closure report on file. Operational tanks remain on-site.
7b	Lucas Drive - Avis Building	Building 295	Avis Rent-A-Car	(1) 550-gallon waste oil	16451	Yes	C-0905-93	Waste oil. Report on file.
7c	Lucas Drive - Avis Building	Building 295	Avis Rent-A-Car	Gasoline	16451	Yes	C-0931-94	No closure report on file.
7d	Lucas Drive - Avis/Budget Building	Building 295	Avis Rent-A-Car	Unknown	16451	Yes	C-0131-10	No closure report on file.
8	Lucas Drive - National	Building 338	National Car Rental	(4) 10,000-gallon (1) 6,000-gallon	21783	Yes	C-1235-95	No closure report on file.
9	WCAA Public Safety Building	Building 358	WCAA	(2) 550-gallon	21828	Yes	C-0707-00	No closure report on file.
10	Shell Service-Air	Building 514	Northwest Airlines/Delta	(1) 10,000-gallon (2) 550-gallon	7433	Yes	C-0136-99	No closure report found for 10,000-gallon tank.
11	GM Air Transport	Building 530	GM	(2) 3,000-gallon (1) 550-gallon	15186	Yes	C-0352-89	No closure report on file.
12	WCAA Smith Terminal Building	Building 503	WCAA		39926	Yes	C-0316-00	No closure report on file.
13	Current site of Building #600	Building 504 (Former DTW Fire Station)	DTW	(5) 4,000-12,000-gallon	5560	Yes	C-0812-96	Diesel, gasoline. All tanks removed from ground.
14	Former NWA Hangar Bld. #711	Building 711	Northwest Airlines/Delta	(3) 12,000-gallon (1) 10,000-gallon	18761	Yes	C-0045-96	Three EG; one gasoline. All tanks removed from ground.
15	Former NWA Hangar Bld. #715	Building 715	Northwest Airlines/Delta	(2) 5,000-gallon (2) 2,000-gallon	3926	Yes	C-0875-94	No closure report on file. All tanks removed from ground.
16	Former 719 Site West Service Drive	Building 719	WCAA	(1) 10,000-gallon lead gas (2) 5,000-gallon Versolglycol (1) 3,000-gallon used hydraulic oil	41642	Yes	C-0465-04	No closure report on file.
17	WCAA Fire Station #100	Building 802	WCAA		39881	Yes	C-0150-99	No closure report on file.
18	Signature South	Northline Rd. (specific site unknown)	Signature	unknown	2304	Yes	C-0830-98	No closure report on file.
19	National Weather Service	Building 348	National Weather Service	(1) 295-gallon diesel	6097	No		Removed from ground on June 26, 1997. No closure report on file.
20	National Weather Service	Building 355	National Weather Service	(1) 500-gallon diesel	39178	No		No closure report on file.
21a	FedEx - DTW	Building 723	FedEx	(3) 30,000-gallon Jet A (1) 10,000-gallon gasoline	314	Yes	C-0225-99	Closure report on file. All tanks removed from ground.
21b	FedEx - DTW	Building 723	FedEx	(3) 30,000-gallon Jet A (1) 10,000-gallon gasoline	314	Yes	C-0622-92	Closure report on file. All tanks removed from ground.
21c	FedEx - DTW	Building 723	FedEx	(3) 30,000-gallon Jet A (1) 10,000-gallon gasoline	314	Yes	C-0802-92	Closure report on file. All tanks removed from ground.

Table 2 - List of Closed Sites
Detroit Metropolitan Airport

Site #	Site Name	Location	Owner	Quantity/Size	Facility ID	UST#	USTID	Notes
22	Federal Aviation Administration	15 Former UST sites; three closed UST sites; one still open. Gathering location and closure data from FAA						Not shown on map.
N/A	Building 703 Fueling Islands	Building 703	Unknown	(1) 10,000-gallon gasoline (1) 10,000-gallon diesel	Unknown	Unknown	Unknown	
N/A	Building 514	Building 514	unknown	(1) 1,000-gallon unknown (suspected gasoline)	39751	Yes	Unknown	
Former Aircraft Gate Gasoline/Diesel/Waste Oil USTs								
23	ASR-8 Site DTW (Demolished)	ASR-8	FAA	(1) 1,000-gallon	50001087		C-0008-93	Closed - notice of Corrective Action (site demolished with Rwy 4L Construction)
24	Unknown	Old Davey Concourse C	Delta Air Lines		21647	Yes	C-0752-98	No report on file.
25	Unknown	Old Davey Concourse C	Northwest Airlines		21647	Yes	C-0162-89	No report on file.
26	Former Gate C-8	Old Davey Concourse C	Northwest Airlines	(1) 10,000-gallon	21647	Yes	C-0571-02	Report on file.
27	Former Gate D-7	Old Davey Concourse D	Northwest Airlines	(1) 10,000-gallon	3925	Yes	C-0109-99	Notice of Corrective Action. Report on file.
28	Former Gate E-1	Old Davey Concourse E	Northwest Airlines	(1) 3,000-gallon diesel	3924	Yes	C-0367-02	Corrective report as UST report same as T-27 by Thomas Krasner 2/2/02
29	Former Gate E-2	Old Davey Concourse E	Northwest Airlines	(1) 10,000-gallon gasoline	3924	Yes	C-0108-99	Report on file for former concourse F, Gate 2, 00007432. Release C-110-99. MDEQ website release date is 2/16/99.
30	Former Gate F-2	Old Davey Concourse F	Northwest Airlines	(1) 10,000-gallon	7432	Yes	C-0110-99	Two releases reported (also 8/1/94). Report on file.
31	Former Gate F-3	Old Davey Concourse F	United Airlines	(1) 10,000-gallon gasoline	7432	Yes	C-0375-02	Two releases reported (also 8/1/94). Report on file.
32	Former Gate A-1	Old Davey Concourse A	United Airlines	(1) 10,000-gallon	39970	Yes	C-0200-09	No closure report on file.
33	Former Gate B-3	Old Davey Concourse B	Continental Airlines	(1) 10,000-gallon	39927	Yes	C-1256-98	No closure report on file.
N/A	Unknown	Unknown	Unknown	(2) 10,000-gallon gasoline (1) 5,000-gallon unknown	2276	Unknown	Unknown	Based on UST Registration Fee memo (1/19/1) addressed to Eastern Airlines, Inc. to pay registration fees on three USTs. A response indicated the tanks (located at the cargo building and hangar building, and concourse area) and that the tanks were owned by Eastern. No other information was provided, other than the Facility ID # (D-002276).

**Environmental Management Plan
Detroit Metropolitan Airport**

APPENDICES

**Environmental Management Plan
Detroit Metropolitan Airport**

Appendix A

Site Summary Sheets

Detroit Metropolitan Airport – Environmental Management Plan
Site-Specific Information Sheet

Site Name: Former TWA Gate C-2

Site Number: L1

Location: The site was located on the northwestern portion of former Gate C-2 for the Davey Terminal at Detroit Metropolitan Airport prior to renovation activities. Currently, the site is located near Gate D-3 at the North Terminal.

Site Information: The site formerly included a 1,000-gallon underground storage tank (UST) that stored unleaded gasoline for airport vehicles. The UST was removed from the ground in December 1996. During UST removal activities, visual and olfactory evidence of contaminated soils was observed and a release was confirmed (C-1042-96). Approximately 12 cubic yards of contaminated soil surrounding the UST was removed from the excavation and transported off-site for disposal. The excavation was limited due to potential undermining of the concrete tarmac within which the excavation was conducted. Following the excavation, soil sampling was conducted on the floor and sidewalls of the UST cavity. Results of the soil verification samples indicated contamination exceeding the MDEQ's Tier 1 criteria. In February 1997, an additional subsurface investigation was conducted in an attempt to delineate contamination associated with the UST. Results of the investigation indicated that soil contamination exceeding MDEQ's Tier 1 criteria was limited to the former UST excavation pit to a depth of 12 feet below ground surface (bgs), and 25 feet east, 25 feet west, and 25 feet south of the former UST excavation pit to depths of 8 feet bgs. The impacts at this site have been adequately delineated.

Due to the proximity of the former UST location to a storage area in the terminal building, and the presence of contamination exceeding commercial Tier 1 cleanup criteria for volatilization to, indoor air, monitoring was conducted within the storage area. Results of the indoor air monitoring did not indicate the presence of contaminants exceeding applicable site specific (commercial) criteria.

Detroit Metropolitan Airport – Environmental Management Plan
Site-Specific Information Sheet

Site Name: Former Northwest Airlines Gate E1

Site Number: L2

Location: The site is located near former Northwest Airlines Gate E-8 at the Davey Terminal prior to renovation activities. Currently, the site is located near Gate E-2 at the North Terminal.

Site Information: The site formerly included three underground storage tanks (USTs); one 3,000-gallon diesel UST (identified as 'E-1' on MDEQ UST database), and two 10,000-gallon gasoline USTs (identified as '1' and 'E-3' on MDEQ UST database). Documentation indicates that all three of the USTs have been removed from the ground; however, the MDEQ UST database lists UST 'E-3' as closed-in-place. Four release identification numbers have been associated with the site (release IDs C-108-99, C-110-99, C-0367-02, and C-0532-03).

Release ID C-0367-02 pertains to the 3,000-gallon diesel UST ('E-1'), which was removed in 2002 and the release was closed in 2003 with unrestricted residential use based on a Tier 1 evaluation.

Release ID C-110-99, although not currently identified on the MDEQ LUST database, pertains to a 10,000-gallon UST identified as UST 'E-2' (subsequently identified as UST '1'). This release was reported during upgrades to the UST system piping in February 1999 in which one soil sample collected during excavation activities identified contamination above MDEQ Tier I criteria. A site assessment of the UST area included a subsurface investigation of seven soil borings and sample collection. Based on laboratory analytical data from the investigation, closure under Tier I Commercial IV and Tier II Commercial criteria was petitioned in a February 2000 LUST Closure Report. Further documentation pertaining to this LUST Closure Report was not identified, with the exception of the MDEQ UST database identifying the release as closed with a Notice of Corrective Action.

Release C-108-99 was identified on the MDEQ UST database as closed in December 2000. ASTI believes this release is associated with release C-110-99 and references to the releases may have been used interchangeably within the documents reviewed.

Release C-0532-03 is currently listed as an 'open' LUST site. This release pertains to the 10,000-gallon tank identified as UST '1'. This release was identified following a May 2003 Site Assessment of USTs '1' and 'E-1', subsequent to their removal in 2002. It is ASTI's understanding that release C-0532-03 pertains to the same 10,000-gallon UST identified in the C-108-99 release and was wrongfully recorded as a separate release. A December 2011 LUST Closure Clarification letter to the MDEQ written by Barr Engineering on behalf of Delta Air Lines petitions for closure of release C-0532-03 on the basis of misreporting of the LUST and the removal of potentially contaminated soils in the area of the UST during terminal renovations conducted in 2006. A response from the MDEQ regarding this petition was not identified.

UST 'E-3' was a previously unknown UST discovered in 2006 during North Terminal construction; it was subsequently registered and removed from the ground.

Soil borings completed around the UST cavity indicate that the sand and gravel observed in soil borings GP-1 and GP-3 are not contiguous across the site. In addition, subsequent site activities addressed the potential presence of free phase in the pump island area by removal of additional soils.

In June of 2013, ECT, a consultant for the WCAA, supervised soil removal in the area of the former pump islands and collected follow-up soil verification samples. This appears to have been completed to address the MDEQ's free phase comments in relation to soil borings GP-7 and GP-8, which contained elevated levels of petroleum constituents. No information on the disposition of the soils or if any activities occurred in the former tank cavity could be found.

Based on review of the MDEQ comments, and the subsequent site activities, it appears the MDEQ's primary concern is the presence of undocumented fill material in the former UST cavity and its potential to impact potential groundwater within the excavation. Review of the subsurface soil data revealed the site is primarily clay-based soil and groundwater is generally limited to the former UST excavation.

Detroit Metropolitan Airport – Environmental Management Plan
Site-Specific Information Sheet

Site Name: Former BP Oil Service Station

Site Number: L3

Location: Former Building 531 - East of Rogell Drive South of Burton Drive, and west of East Service Drive.

Site Information: This site was formerly operated as a BP Oil gasoline station (former Building 531) at Detroit Metropolitan Airport (DTW). The site is currently vacant. The area is generally inaccessible to the public and is not used for buildings or structures. No tanks, dispensers or remnants of the former gas station are present.

The former gasoline station utilized five underground storage tanks (USTs); three 10,000-gallon gasoline USTs, one 4,000-gallon diesel UST, and one 500-gallon used motor oil UST. During the removal of the 500-gallon used motor oil UST in June 2005, a release was confirmed (C-0170-05). The release was closed on October 30, 2006 based on a Tier I Evaluation with no land use restrictions. During site assessment activities in July 2007, a separate release was confirmed (C-0205-07) based on a review of laboratory analytical data from soil samples collected in the vicinity of the gasoline and diesel USTs. The UST system was removed from the ground in August 2008. Following the UST removal activities, site soils were re-placed into the excavation. A separate excavation of the former pump island locations was conducted in June 2009, along with an additional soil boring sampling. Following the excavation, site soils were again re-placed into the excavation.

ECT completed a LUST Closure Report for release C-0205-07 in January of 2012. The Tier 1 Non-Residential LUST Closure Report incorporated the use of institutional controls, including the declaration of a Restrictive Covenant and a Notice of Corrective Actions, along with the application of MDEQ's Non-Residential Cleanup Criteria.

In February of 2012, the MDEQ's District's Quality Review Team (QRT) reviewed the closure submittal. The following relevant comments were identified during the review of the QRT summary:

- Groundwater appears perched and limited;
- The extent of the soil contamination is adequately delineated horizontally and vertically;
- Soils within the excavation from 0-12' feet have not been characterized;
- Soil chemical data within multiple borings indicate the potential presence of free phase in the area of the pump island; and
- The deed restriction was not adequate and needs to be refilled.

In summary MDEQ concluded the following activities need to be conducted to complete closure:

- Soil borings GP-1 through GP-3 (within tank excavation) indicated the presence of sand and gravel at approximately 10 feet bgs. MDEQ considers this a potential migration pathway for contaminants and recommended further evaluation of the issue; and
- Contaminant levels in backfill of tank excavation must be determined.

Detroit Metropolitan Airport – Environmental Management Plan
Site-Specific Information Sheet

Site Name: Delta Cargo

Site Number: L4

Location: Building 536.

Site Information: This site was formerly the Northwest Airlines Hanger #536. According to a LUST Final Assessment Report dated January 17, 1997, two 550-gallon USTs were removed on May 12, 1993 and verification samples were collected. The overburden soils were placed back in the excavation and no laboratory analysis on these soils was conducted. Additional soil borings were completed surrounding the excavation in October of 1994. Chromium was detected at a concentration of 21,000 ug/kg, and determined to be naturally occurring. Additional borings within the area of the former excavation were recommended to characterize soils. No further documentation has been identified.

Detroit Metropolitan Airport – Environmental Management Plan
Site-Specific Information Sheet

Site Name: National Alamo Rental Car

Site Number: L5

Location: Building 338.

Site Information: This site originally contained four 10,000-gallon and one 6,000-gallon gasoline tanks, and two 550-gallon new and used oil tanks. No further documentation has been identified.

Detroit Metropolitan Airport – Environmental Management Plan
Site-Specific Information Sheet

Site Name: Dollar Car Rental

Site Number: L6

Location: Building 334.

Site Information: This site originally contained one 10,000-gallon gasoline tank. A soil vapor extraction system has been proposed but not installed. No further documentation has been identified.

Detroit Metropolitan Airport – Environmental Management Plan
Site-Specific Information Sheet

Site Name: Former Delta Fuel Farm

Site Number: L7

Location: Area surrounding Building 614, bound by Rogell Drive to the southeast and East Service Drive to the northwest

Site Information: The former fuel farm previously contained 22 underground storage tanks (USTs); seventeen (17) 30,000-gallon jet fuel USTs, one 20,000-gallon gasoline UST, one 10,000-gallon waste jet fuel UST, one 10,000-gallon waste oil UST, one 6,000-gallon gasoline UST, and one 5,000-gallon waste jet fuel UST. The UST systems included pumps, filter vessels, and associated piping. These systems were contained within an area approximately 140' x 150' x 16 feet (depth) and included a truck loading island approximately 60' x 250' adjoining the UST fuel farm area.

From April to June of 1989, UST removal activities were conducted at the site. Removal activities included the removal of the tanks and product piping and transportation of the UST systems to a disposal facility. Approximately 13,300 gallons of liquid waste was removed during the removal activities. The sand fill surrounding the USTs was analyzed for contamination and laboratory analysis revealed contamination levels in excess of Michigan Department of Natural Resources (MDNR) recommended levels. Additionally, concrete pads underlying the USTs were removed and the soils directly under the pads revealed contamination exceeding MDNR recommended levels. Subsequently, soils were removed from the UST cavity until adequate clean-up levels were achieved. A total of 7,050 cubic yards of contaminated soil was removed from the UST excavation and transported off-site. The excavation was backfilled with clean clay/sand.

An additional subsurface investigation of the former truck island, consisting of eight soil borings and soil sampling, revealed contamination in excess of MDNR recommended levels. A total of 800 cubic yards of soil was removed from the former truck island area and soil verification samples were collected to meet MDNR recommended clean-up levels. The excavation was backfilled with clean clay/sand.

Known Contaminants Present: Soil verification samples were collected following UST removal activities which indicated that the remaining petroleum residual were all below the most restrictive MDEQ Part 213 Tier 1 Generic Residential Cleanup Criteria. The following contaminants were identified at this site during clean-up activities:

- Toluene (≤ 4 ug/kg)
- Xylenes (≤ 19 ug/kg)
- Total Petroleum Hydrocarbons (≤ 500 mg/kg)

Detroit Metropolitan Airport – Environmental Management Plan
Site-Specific Information Sheet

Site Name: Former FAA Radar Site

Site Number: L8

Location: West of RWY4L/22R

Site Information: No documentation has been identified.

**Environmental Management Plan
Detroit Metropolitan Airport**

Appendix B

Acknowledgement of Due Care Requirements

**Environmental Management Plan
Detroit Metropolitan Airport**

Appendix C

Health and Safety Plan Outline

EXAMPLE Site Specific Health and Safety Plan

Detroit Metropolitan Airport

Romulus, Michigan

Procedure Applicability

Location: Detroit Metropolitan Airport

Work Location: [Location Name and/or Address]

General Contact Information

Wayne County Airport Authority
Environmental Unit
L.C. Smith Building - Mezzanine
Detroit Metropolitan Airport
Romulus, Michigan 48242
Mr. Bryan C. Wagoner, P.E.
734.247.3686
734.247.7914

Plan Prepared By: [Author's Company (Author's Name)]

Date Created: [Date]

Revision Dates: [Date(s) If Any]

1.0 INTRODUCTION

This Site-Specific Health and Safety Plan (SSHSP) for the Detroit Metropolitan Airport (DTW) **[Site Name]** site located at **[Location Name and/or Address]** (Work Location) addresses the health/safety concerns and hazards associated with soils and/or groundwater contamination that may be encountered during the **[General Type of Work]** activities (Work Activities) to be conducted at the Work Location. This SSHSP was prepared on **[Date]** for Work Activities expected to be conducted from **[Start Date]** to **[End Date]**. Available information regarding environmental conditions at the Work Location are provided in the *Detroit Metro Environmental Management Plan*. If designated work zones are required within the site, an additional site map indicating those zones, should be attached to this SSHSP.

This SSHSP was prepared to provide the necessary safety and health procedures for on-site activities at the Work Location as described in Section 1.3, below. In addition, this SSHSP is consistent with, and intended to comply with, state and federal regulations, including 29 CFR 1910.120 (i) Occupational Safety and Health Standard, 40 CFR Part 311 of CERCLA, 49 CFR Part 171, 40 CFR Part 260 – 279, MIOSHA Act 154 of 1974, NREPA Act 451 of 1994, and pertinent OSHA regulations.

All individuals conducting work at, or visiting, the Work Location will read, understand and sign the signature page located at the end of this SSHSP prior to being permitted on the Work Location. A hardcopy of this plan will be maintained in an easily accessible location at the Work Location at all times during the Work Activities.

1.1 Hazardous Substance Definition

For the purposes of this SSHSP, hazardous substances shall include all chemicals listed per 29 CFR 1910.120: including CERCLA hazardous substances, biological or disease causing agent, DOT hazardous material per 49 CFR 172.101, RCRA hazardous waste per 40 CFR 261.3, and Part 201 hazardous substance per NREPA Act PA 451.

1.2 Site Details

This SSHSP was written to address the environmental health & safety issues that may exist at the Work Location described below:

[Describe the Work Location in detail]

1.3 Scope of Work

This SSHSP was written to address the environmental health & safety issues related to the proposed Work Activities described below:

[Describe the Work Activities in Detail].

1.4 Site Hazard Information Summary

1.4.1 Hazardous Substances Summary

Available information regarding environmental conditions at the Work Site is detailed in **[Source(s) of Information]**. The following tables summarize the maximum detected concentrations of contaminants (if any) in comparison to the applicable Michigan Department of Environmental Quality (DEQ) Part 201 Generic Non-Residential Direct Contact Clean-up Criteria (GNRDCCC).

Table of Soil Contaminants in Excess of GNRDCCC

Chemical Compound	CAS No.	Applicable GNRDCCC (µg/Kg)	Analytical Result (µg/Kg)
None Identified			

Table of Groundwater Contaminants in Excess of GNRDCCC

Chemical Compound	CAS No.	Applicable GNRDCCC (µg/L)	Analytical Result (µg/L)
None Identified			

1.4.2 Physical Hazards Summary

Physical hazards that may be encountered while at the Work Location may include slip/trip/fall, fire hazards, sharp edges, pinch points, heat and cold stress, uneven ground, steep slopes, standing water, muck, electrical hazards, driving hazards, icy conditions, heavy equipment/machinery, moving parts, lifting, power tools, hand tools, overhead and underground utilities, excavation, confined spaces, debris, poor housekeeping practices, working in or near a road-right-of-way, proper storage, security, noise, and exposure to the elements.

1.4.3 Worker Requirements Summary

All workers are required to have read this SSHSP. Additional certifications, permits, or training may be required for certain tasks performed, such as operating heavy machinery, entering confined space, or ground disturbance, and this SSHSP is not intended to replace those requirements. For more information on training requirements refer to Section 3.0 Training.

Below is an example Site Contact and Emergency Contact information form for site Work Activities.

1.4.4 Site Contact Summary

DTW Contacts	Title	Phone Number
_____	Site Supervisor	_____
_____	Site Safety Officer	_____

<u>Contractor Contacts</u>	<u>Company</u>	<u>Phone Number</u>
<u>Other Contacts</u>		<u>Phone Number</u>
MISS DIG		800.482.7171

1.4.5 Emergency Contact Summary

<u>Emergency Contacts</u>	<u>Phone Number</u>
Police/Fire Emergency	911
Annapolis Hospital	734.467.4000
MDEQ Spills Hotline	517.373.7660
MDEQ Emergency	800.292.4706
EPA- Office of Solid Waste/Emergency Response	800.424.9346
Poison Control Center	800.222.1222

2.0 RESPONSIBILITY

The Site Supervisor, is responsible for project oversight and must be contacted if an injury or emergency occurs. The Site Safety Officer, is responsible for review and updating of this SSHSP. All personnel working on the project are responsible for re-evaluating health and safety procedures while on site, and communicating those evaluations to the Site Safety Officer. If changes in site conditions occur, workers must contact the Site Safety Officer, or Site Supervisor.

2.1 Subcontractors

All subcontractors working at the Work Location must designate a site safety coordinator for their own personnel. This person is responsible for ensuring that this SSHSP is properly implemented by the subcontractor's personnel and for reporting any incidents or site information to the Site Safety Officer. All subcontractor workers are responsible for reading, understanding, and signing this SSHSP (see Section 9.0) prior to conducting field activities at the Work Location. All subcontractor workers are responsible for maintaining all required and applicable certifications for the Work Activities.

3.0 TRAINING

3.1 Workers and General Public

All individuals who visit or work in the Work Location shall read and understand this SSHSP before their first site visit. All workers at the Work Location shall receive training as indicated in Section 3.2 before their first site visit. Precautions shall be taken to prohibit the general public from access the Work Location.

Use of the term "workers" in this SSHSP shall refer to any individual that is conducting tasks at the Work Location. Use of the term "general public" in this SSHSP shall refer to all other individuals visiting the Work Location.

3.2 Training Requirements

Site training shall be performed on site by the Site Supervisor, Project Manager, or a designed worker. Training for this Work Location shall include:

1. Identification of known or potential contamination from hazardous substances, including all physical and chemical hazards associated with the contamination;
2. Efforts to be taken to reduce potential exposure to those hazardous substances and conditions;
3. Procedures to follow if exposed to those hazardous substances or conditions;
4. Safety equipment and safety procedures required for personal protection during specific site tasks;
5. Identification and location of work and exclusion zones, if required;
6. Reporting procedures for unusual or unanticipated site conditions, and
7. Evacuation routes.

In addition, all individuals who perform work at the Work Location shall know and follow general safety rules and good working practices applicable to the Work Activities.

SAMPLE

4.0 PERSONAL PROTECTIVE EQUIPMENT (PPE)

4.1 Personal Protective Equipment Review Program

All required Personal Protective Equipment (PPE) will be provided for workers while conducting tasks at the Work Location. Workers are required to be trained for the specific PPE provided before conducting Work Activities.

At minimum, the following PPE shall be worn while at the Work Location: hard hat, safety glasses, long sleeve shirt, long pants, safety vests, gloves, and steel toed shoes. High visibility (hunter orange, yellow, or neon green) shirts and jackets may be worn as a substitution for the safety vests during daylight hours. High visibility shirt or jacket is required, in lieu of safety vests, when operating equipment with moving parts. Hearing protection will be required unless noise testing within the work area demonstrates that sustained noise levels do not exceed 90 decibels or and peak noise levels do not exceed 100 decibels. When working with equipment with the potential to pinch or impact hands, work gloves will be worn at all times. If conducting a job which involves contact or potential contact with contaminated soils as defined in Section 1.4.1, powder free latex or nitrile gloves will be worn. Workers shall dress appropriately for weather conditions. Additional requirements associated with specific tasks are included in Table 1 below.

Table 1. Additional Required Task Specific PPE and Safety Measures

Task	Additional PPE and Safety Measures Required
Ground disturbance (Excavation)	Utility/hand clearance, ear protection, work gloves
Heavy equipment	Equipment maintenance/inspection, ear protection, certification/training, verbal and non-verbal communication, proper signs
Heavy lifting/snow shoveling	Back brace, proper lifting techniques, work gloves
Power tools	Work gloves, ear protection, high visibility shirt or jacket, appropriate eye and respiratory protection

Items not mentioned in the above table should be evaluated for safety and assessed for additional PPE requirements. The above PPE are general requirements, additional PPE may be required based on conditions present.

5.0 POTENTIAL HAZARDOUS CONDITIONS

5.1 *Slip, Trip, or Fall*

Slip/trip/fall is the most common potential physical hazard at the Work Location.

The most common injuries of slip, trip and fall are scrapes, lacerations, contusions (bruises), and sprains. More serious injuries that may occur are soft tissue injury, puncture wounds, impalements, eye injuries, broken bones, internal injury, head injury, suffocation, asphyxiation, or death. In the event of injury, workers shall assess the seriousness of the injury and treat accordingly. In the event of serious injury, seek medical assistance. If serious injury is suspected, the injured worker shall not be moved unless in a life threatening situation, and emergency services shall be contacted immediately. In the event the worker is not breathing, begin CPR until medical assistance arrives. The Site Safety Officer shall be notified of each such incident.

Good housekeeping is mandatory. Workers are required to inspect slopes, berms, and walking paths for potential tripping hazards and damage including holes, failing slopes, and uneven terrain. If a hole is discovered, workers shall fill the hole completely to prevent tripping. If they are unable to fill the hole immediately, they shall visibly mark the area with stakes and flagging until the hole can be filled. If a slope is failing, workers shall avoid walking on or near the slope and shall visibly mark the area with stakes and flagging. . If the terrain has become uneven, the source shall be identified and corrected, and if the situation cannot be corrected immediately, the worker shall visibly mark the area with stakes and flagging. Workers shall alert the Site Safety Officer immediately for future instruction regarding any of the above situations.

Open confined spaces, such as open excavations, increase the risks associated with slip/trip/fall. Excavations shall not be entered unless more than one worker is on site. Visual barriers such as caution tape shall be used to mark off all excavation areas. The barrier shall remain intact until the excavation is properly filled and secured. No confined space shall be entered without proper certification, permitting and safe guards in place. If a worker falls into a confined space and an emergency response is required; be specific by stating that “this is a confined space entry”. Under no circumstances shall another worker enter a confined space to perform a rescue without proper equipment and training. The Site Safety Officer shall be notified of any such incident

5.2 *Chemical Hazards*

Soils and/or groundwater at the Work Location are known to be contaminated as described in Section 1.4.1. When contacting contaminated soils and/or groundwater, workers shall wear powder free latex or nitrile gloves, safety glasses, long sleeve shirt, pants, and safety toed shoes. Direct contact with a chemical through skin contact, inhalation, ingestion, or absorption can lead to symptoms or injuries depending on the chemical properties, route of exposure, amount exposed to, and personal tolerances. Therefore, workers shall not intentionally inhale, ingest, or inject contaminated soils and/or groundwater.

Workers shall decontaminate all equipment and clothing before leaving the Work Location. Equipment that has come in contact with contaminated soils shall be handled without the proper

PPE including powder free latex or nitrile gloves, safety glasses, long sleeve shirt, and long pants. Workers are required to wash hands thoroughly after coming into contact with contaminated soil and or groundwater, or handling tools that have come in contact with the same.

While working in areas of know volatile organic (VOC) impacts, the breathing zone of workers may need to be monitored. If the Site Safety Officer determines that this is required, monitoring will be conducted using a photo-ionization detector (PID) equipped with a minimum of a 10.6 eV lamp, and will continue during all Work Activities in the contaminated soils and/or groundwater. If air monitoring detects sustained readings above 5 ppm or a spike reading above 20 ppm in the breathing zone, operations in the area will be suspended. Work shall be suspended until either the high VOC readings have subsided below 5 ppm or field personal properly trained in the use of air-supplied PPE can be brought in to complete the work.

5.3 Confined Space Entry

Confined space entry is not anticipated under this SSHSP. If confined space entry is required, a separate SSHSP shall be created, reviewed and approved. A confined space, as defined in Part 90, Rule 1910.146(b), is a space that meets all of the following conditions: is large enough and so configured that a worker can bodily enter and perform assigned work, has limited or restricted means for entry or exit; and is not designed for continuous worker entry.

5.5 Aircraft Hazards

Safety measures to address the hazards associated with the movement of aircraft and aircraft support vehicles in areas outside of the Work Location are not covered in this SSHSP. DTW has procedures in place to address these hazards and all contractor personnel must be properly trained according to those procedures before beginning any work at the Work Location.

5.6 Other Hazards

Other hazards may be present on site that are not addressed in this SSHSP. This SSHSP is intended only to provide guidance in implementing procedures specific to completing Work Activities in or around contaminated environmental media at the Work Location and is not intended to cover other work task hazards. It is impossible to address every hazard that may occur due to unforeseen or unlikely circumstances, and the best procedures are consistent and open communication, and proper training and certification for all workers.

If a worker encounters something that is not included in this SSHSP they shall evaluate the immediate threat and, if possible, withdraw from the immediate area and notify the Site Safety Officer and Project Manager. The Site Safety Officer or Project Manager shall assess whether or not the situation is safe enough to continue work, what changes to work procedures are required, and if PPE changes must be necessary. If a worker is uncomfortable performing a task because of safety concerns, they shall stop work immediately and contact the Site Safety Officer.

6.0 EMERGENCIES

Emergency preparedness is a key element in emergency response. To enhance emergency preparedness, first-aid kit(s) and fire extinguishers should be located in easily accessible locations at the Work Location and all workers must be informed of the locations of these items. A field vehicle shall be available at all times for use in transporting injured workers to the hospital. Workers are required to have access to cell phones or radios at all times. In case of an emergency, the worker shall notify all other persons on site, emergency personnel (as required), and the Site Safety Officer.

Evacuation is unlikely at the Work Location. Evacuation could be necessary in case of fire, chemical spill, severe weather, violence, flooding, or other possibly life threatening events. For evacuation of the immediate work area due to fire or chemical spill, workers shall move upwind and upgradient from the threat zone. Evacuation routes will be determined prior to commencing work each day based on the current wind direction. Evacuation routes must also consider the presence or potential presence of aircraft and support vehicle traffic along the evacuation route. In the event of an evacuation, workers shall leave a minimum fifty-foot buffer around the threat zone

6.1 Emergency Medical Treatment & First Aid

In case of a medical emergency workers shall seek medical assistance. The Site Safety Officer shall be notified of incidences that occur on site. Driving directions to the closest hospital are attached at the end of the SSHSP. The closest emergency room is:

Oakwood Annapolis Hospital
33155 Annapolis Street
Wayne, MI 48184
734-467-4000

7.0 DECONTAMINATION

Decontamination is standard practice at all locations with contaminated soils and/or groundwater in order to protect workers and the general public. Diligence is expected in order to assure that decontamination and use of decontamination equipment results in acceptable decontamination of workers, tools, heavy equipment, and PPE.

After use, all equipment which has come into contact with Work Location soils including, but not limited to, hand tools, boots, and power tools, shall be decontaminated with a detergent solution and rinsed with clean distilled or potable water prior to leaving the Work Location. Gloves and other disposable items shall be disposed of with the general site refuse at the Work Location.

All heavy equipment and vehicles which come in contact with contaminated soils will be decontaminated prior to leaving the Work Location. Bulk soils will be removed from vehicles and heavy equipment using physical methods. Care will be taken to prevent track out of soils on vehicle tires. Prior to heavy equipment being demobilized from the Work Location, all parts that have been in contact with site soils shall be cleaned. Cleaning of vehicles and heavy equipment will be conducted on a decontamination pad using a high-pressure low volume wash with potable water to remove residual impacts.

8.0 COMMUNICATION

8.1 *Job-Specific Meetings*

A health and safety meeting will be conducted every day prior to the beginning of site work in the Work Location. The meeting attendance shall be documented each day. Daily meetings will include a summary of the work tasks to be completed that day and the specific hazards presented by these activities. In addition these meetings will cover any potential hazards presented by the weather or other on-site activities not related to the Work Activities.

8.2 *Material Safety Data Sheets (MSDS)*

MSDS for hazardous and non-hazardous substances that may be used at the Work Location must be provided to the Site Safety Officer by all subcontractors, and will be maintained in an easily accessed location during site work.

9.0 COMMUNICATION

Work Location: **[Location Name and/or Address]**

Work Activities: **[General Type of Work]**

Date of SSHSP **[Date]**

We, the undersigned, have read this SSHSP and understand and agree to all the information, requirements, and procedures contained herein, either directly or by reference, and shall comply with all the requirements of this SSHSP and all applicable health, safety and environmental regulations. Furthermore, we confirm that we have seen the site map and understand the locations and restrictions of any designated work zones.

Signature: _____ Date: _____

Signature: _____ Date: _____

Signature: _____ Date: _____

Signature: _____ Date: _____

Signature: _____ Date: _____

Signature: _____ Date: _____

Signature: _____ Date: _____

Signature: _____ Date: _____

Signature: _____ Date: _____

Signature: _____ Date: _____

Signature: _____ Date: _____

Signature: _____ Date: _____

Signature: _____ Date: _____

Signature: _____ Date: _____

**Site Specific Health and Safety Plan
Detroit Metropolitan Airport
Romulus, Michigan**

**Attachment 1
Route to Hospital**

SAMPLE



A Detroit Metropolitan Wayne County Airport, MI

B 33155 Annapolis St, Wayne, MI 48184

My Notes

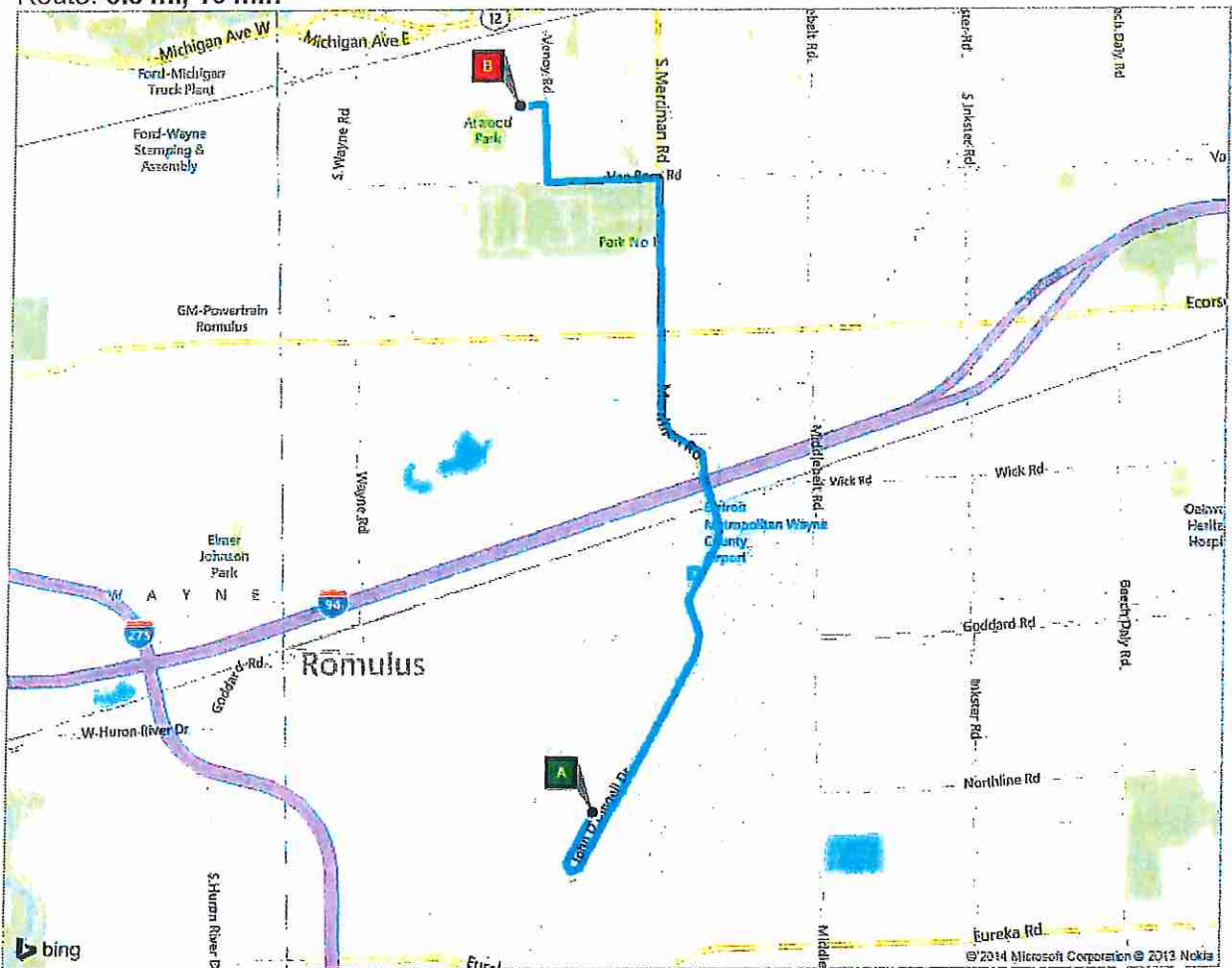
Route: 6.8 mi, 16 min

On the go? Use m.bing.com to find maps, directions, businesses, and more

A	Detroit Metropolitan Wayne County Airport, MI	A-B: 6.8 mi 16 min
	1. Depart from Detroit Metropolitan Wayne County Airport, MI	358 ft
↑	2. Keep straight onto Worldgateway Pl	190 ft
↑	3. Keep straight toward John D Dingell Dr	1.1 mi
↑	4. Keep straight onto John D Dingell Dr	1.3 mi
↗	5. Bear right onto William G Rogell Dr	0.5 mi
↑	6. Keep straight onto Merriman Rd	2.4 mi
↖	7. Turn left onto Van Born Rd <i>Sunoco on the corner</i>	0.7 mi
↘	8. Turn right onto Venoy Rd	0.5 mi
↖	9. Turn left onto Annapolis St	0.2 mi
B	10. Arrive at 33155 Annapolis St, Wayne, MI 48184 <i>The last intersection is Dean St</i> <i>If you reach Evans St, you've gone too far</i>	

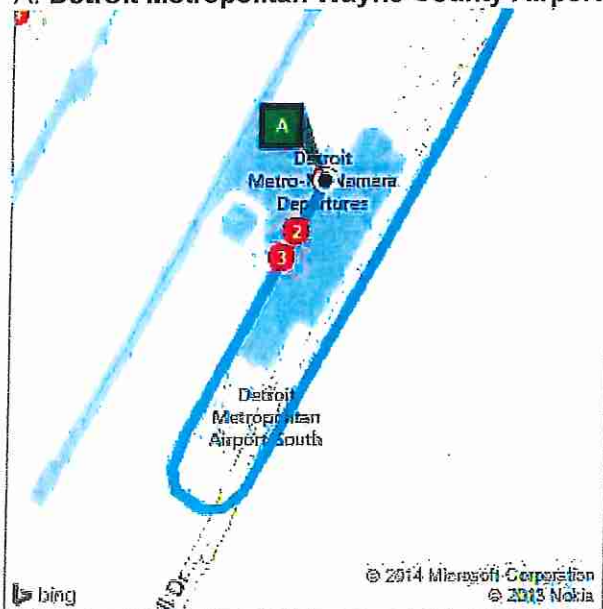
These directions are subject to the Microsoft® Service Agreement and for informational purposes only. No guarantee is made regarding their completeness or accuracy. Construction projects, traffic, or other events may cause actual conditions to differ from these results. Map and traffic data © 2014 NAVTEQ™.

Route: 6.8 mi, 16 min



This was your map view in the browser window.

A: Detroit Metropolitan Wayne County Airport...



B: 33155 Annapolis St, Wayne, MI 48184



**Environmental Management Plan
Detroit Metropolitan Airport**

Appendix D

Documentation of Soil Management Form

**DTW Environmental Management Plan
Documentation of Soil Management**

If construction workers, employees, or other personnel remove soil from any sites shown in Section 4.0 of the DTW Environmental Management Plan (the Plan), they must provide WCAA with documentation of its proper handling and disposal in accordance with local, state and federal regulations. Soils that remain on-site must be staged in an area approved by WCAA Environmental Unit. In addition, the following information must be provided, including required documentation.

Name of the Site _____

Site Number: _____

Reason for Soil Removal: _____

Date of Soil Removal Activities: _____

Quantity of Soil Removed: _____

Disposition of Soil: _____

Manifest or Bills of Lading No.: _____

Attach Disposal Documentation

Submitted By:

Print Name

Signature

Date

Company

**Environmental Management Plan
Detroit Metropolitan Airport**

Appendix E

Deed Restrictions

Deed Restriction

Building 531 – Former General Motors Hangar



NOTICE TO LOCAL UNIT(S) OF GOVERNMENT OF LAND USE RESTRICTIONS

This information and form is required under Sections 21310a(5) and 21316 of Part 213, Leaking Underground Storage Tanks (LUST), of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. Failure to comply with the provisions of this Act may result in civil fines not to exceed \$10,000 for each day the violation continues or failure to comply continues.

Instructions: (1) Use this form to provide notice of land use restrictions that are part of the corrective action plan to the Local Unit(s) of Government (LUG). (2) If corrective action is based on the use of institutional controls regarding off-site migration of regulated substances, submit a draft copy of this notification with the corrective action plan and wait for Remediation & Redevelopment Division (RRD) approval before providing notice to the LUG. If the institutional controls are for on-site contamination, the owner/operator may proceed with providing notice to the LUG. (3) Send the notice to the city, village or township clerk. Provide a copy to the County/District Health Department if groundwater exceeds Tier 1 residential criteria. (4) Submit a copy of the notice and proof of providing the notice with the Closure Report (EQP 3843) to the appropriate RRD District Office in form EQP4410. This notice does not constitute a warranty or representation of any kind by the State of Michigan that the corrective actions performed in accordance with this notice will result in the achievement of the remedial criteria established by Law, or that the property is suitable for any particular use.

City of Romulus _____
 Name of Local Unit of Government _____ Name of Local Unit of Government _____

Notice to the Local Unit of Government Receiving this Form:

A corrective action plan for the site named below has been developed as a result of a release from an underground storage tank. This form and the attachments are to provide the local unit(s) of government notice of the land use restrictions that are part of the corrective action plan. A copy of the institutional control mechanism(s) in the form of a Corrective Action Notice to Register of Deeds, and/or Restrictive Covenant, and/or alternate mechanism is/are attached. The attached institutional control mechanism(s) describe the land use restrictions and the land where the restrictions apply.

Owner or Operator: Wayne County Airport Authority

Site Name: Building 531

Site Address: Building 531 Rogell Drive City: Romulus State: Michigan Zip: 48174

Contact Person: Bryan Wagoner Phone Number: 734-247-3686

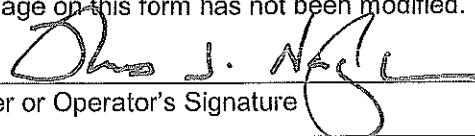
Mailing Address: LC Smith Terminal, Mezzanine City: Detroit State: Michigan Zip: 48242

Qualified Underground Storage Tank Consultant: Environmental Consulting & Technology, Inc.

Address: 33900 Harper Avenue, Suite 101 City: Clinton Township State: Michigan Zip: 48035

Contact Person: John Kennedy Phone Number: 586-296-1010

I hereby attest to the accuracy of the statements in this document and all attachments. I further certify that the language on this form has not been modified.


 Owner or Operator's Signature

12/8/2011
 Date

DECLARATION OF RESTRICTIVE COVENANT

MDEQ Reference No. RC-RRD-213-10-100

This Declaration of Restrictive Covenant (Restrictive Covenant) was recorded with the Wayne County Register of Deeds to protect public health, safety, and welfare, and the environment by prohibiting or restricting activities that could result in unacceptable exposure to environmental contamination present at the property located in Romulus, Michigan known as former Building 531 at Detroit Metro Airport owned by Wayne County Airport Authority and legally described in the attached Exhibit 1 (Property).

The Property is associated with former Building 531 (Facility ID: 00039825) for which a Closure Report (CR) was completed under Part 213, Leaking Underground Storage Tanks, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (NREPA), MCL 324.21301 *et seq.* Corrective actions that were implemented to address environmental contamination are fully described in the CR dated June 20, 2011. A copy of the CR is available from the Michigan Department of Environmental Quality (MDEQ) Remediation and Redevelopment Division District Office.

Part 213 of NREPA requires the recording of this Restrictive Covenant with the Wayne County Register of Deeds based upon the corrective action activities for the site to: (1) restrict unacceptable exposures to regulated substances located on the Property; (2) assure that the use of the Property is consistent with the exposure assumptions used to develop cleanup criteria under Section 21304a(2) of the NREPA, and (3) assure the exposure control measures relied upon in the CR are effective. The restrictions contained in this Restrictive Covenant are based upon information available at the time the CR was implemented by Wayne County Airport Authority. Failure of the corrective action to achieve and maintain the cleanup criteria, exposure controls, and requirements specified in the CR; future changes in the environmental condition of the Property or changes in the cleanup criteria developed under Section 21304a(2) of the NREPA; the discovery of environmental conditions at the Property that were not accounted for in the CR; or use of the Property in a manner inconsistent with the restrictions described below may result in this Restrictive Covenant not being protective of public health, safety, and welfare, and the environment. The adequacy of the corrective actions undertaken pursuant to the CR may not have been reviewed by the MDEQ. The "Survey of Property and Limits of Land and Resource Use Restrictions," attached as Exhibit 2, provides a survey of the Property that depicts the area subject to restriction and additional legal descriptions that distinguish those portions of the Property that are subject to the land and resource use restrictions specified in this Restrictive Covenant.

Definitions

For the purposes of this Restrictive Covenant, the following definitions shall apply:

"MDEQ" means the Michigan Department of Environmental Quality, its successor entities, and those persons or entities acting on its behalf.

"Owner" means at any given time the then-current title holder of all or any portion of the Property.

"RBCA" means the American Society for Testing and Materials (ASTM) document entitled, "Standard Guide for Risk-Based Corrective Action Applied at Petroleum Release Sites," Designation E 1739-95.

All other terms used in this document which are defined in Part 3, Definitions, of the NREPA; Part 213 of the NREPA; Part 201, Environmental Remediation, of the NREPA; or the Part 201 Administrative Rules (Part 201 Rules), 1990 AACRS R 299.5101 *et seq.*, shall have the same meaning in this document as in Parts 3, 213, and 201, and the Part 201 Rules, as of the date this Restrictive Covenant is filed.

Summary of Corrective Actions

Unleaded gasoline was released from a UST resulting in subsurface contamination on a portion of the property. Elevated concentrations of the analytes were detected in soil. Analytes include benzene, ethylbenzene, 2-methylnaphthalene, naphthalene, toluene, trimethylbenzenes, and xylenes. Current levels of contamination do not allow unrestricted use of the Property. Soils and/or groundwater may be remediated (i.e. soil removal) as a corrective action to eliminate hazards associated with the contamination. With appropriate remediation, the site may be reevaluated.

Without remediation, utility and construction workers shall be required to wear appropriate personal protective equipment to prevent direct contact with contaminated soils. In the event that new buildings are constructed at the affected portion of the Property, an engineered vapor barrier shall be constructed under the new buildings to prevent migration of contamination in the vapor phase into the building at levels that would result in unacceptable exposures through inhalation.

Although groundwater was not observed during investigations and the closure process, groundwater shall not be used for potable purposes.

THEREFORE,

1. Declaration of Land and Resource Use Restrictions

In accordance with the CR, Wayne County Airport Authority, as the owner of the Property, covenants that the Property is subject to the following restrictions:

a. Prohibited Land Uses. The Owner shall prohibit all uses of the property that are not compatible with the non-residential land use category relied on by the CR and allowed under Section 21304a(2) of the NREPA, and generally described in the "Description of Allowable Uses," attached as Exhibit 3. Cleanup criteria for land use-based corrective actions are located in the Government Documents Section of the Library of Michigan.

b. Prohibited Activities to Eliminate Unacceptable Exposures to Regulated Substances. The Owner shall prohibit activities within the portions of the Property designated in Exhibit 2 that may result in exposures above levels established in the CR. These prohibited activities include:

Construction of new structures unless; i) such construction incorporates engineering controls designed to eliminate the potential for subsurface vapor phase hazardous substances to migrate into the new structure at concentrations greater than applicable criteria; ii) prior to construction of any structure an evaluation of the potential for regulated substances to volatilize into indoor air assures the protection of persons who may be present in the buildings and compliance with Section 20107a of the NREPA; iii) contaminated soils are remediated (i.e. removed and disposed at an appropriate landfill) to levels acceptable for the construction of structures.

c. Prohibited Activities to Ensure Effectiveness and Integrity of the Corrective Action. The Owner shall prohibit activities on the Property that may interfere with any element of the CR, including the performance of operation and maintenance activities, monitoring, or other measures necessary to ensure the effectiveness and integrity of the CR.

none

d. Contaminated Soil Management. The Owner shall manage all soils, media, and/or debris located on the Property in accordance with the applicable requirements of Sections 21304b and 20120c of the NREPA; Part 111, Hazardous Waste Management, of the NREPA; Subtitle C of the Resource Conservation and Recovery Act, 42 USC Section 6901 *et seq.*; the administrative rules promulgated thereunder; and all other relevant state and federal laws.

2. MDEQ Access. The Owner grants to the MDEQ and its designated representatives the right to enter the Property at reasonable times for the purpose of determining and monitoring compliance with the CR, including the right to take samples, inspect the operation and maintenance of the corrective action measures and inspect any records relating to them, and to perform any actions necessary to maintain compliance with Part 213 and the CR.

3. Conveyance of Property Interest. A conveyance of title, easement, or other interest in the Property shall not be consummated by the Owner without adequate and complete provision for compliance with the terms of the CR and this Restrictive Covenant. A copy of this Restrictive Covenant shall be provided to all future owners, heirs, successors, lessees, easement holders, assigns, and transferees by the person transferring the interest in accordance with Section 20116(3) and Section 21310a(2)(c) of the NREPA.

4. Audits Pursuant to Section 21315 of the NREPA. This Restrictive Covenant is subject to audits in accordance with the provisions of Section 21315 of the NREPA, and such an audit may result in the finding by the MDEQ that this Restrictive Covenant is not protective of the public health, safety, and welfare, and the environment.

5. Term of Restrictive Covenant. This Restrictive Covenant shall run with the Property and is binding on the Owner; future owners; and their successors and assigns, lessees, easement holders, and any authorized agents, employees, or persons acting under their direction and control. This Restrictive Covenant shall continue in effect until the MDEQ or its successor determines that regulated substances no longer present an unacceptable risk to the public

health, safety, or welfare, or the environment, and may only be modified or rescinded with the written approval of the MDEQ.

6. Enforcement of Restrictive Covenant. The State of Michigan, through the MDEQ, and Wayne County Airport Authority may individually enforce the restrictions set forth in this Restrictive Covenant by legal action in a court of competent jurisdiction.

7. Disclaimer. This Property contains regulated substances in excess of the concentrations developed as the unrestricted residential criteria under Section 21304a(2) of the NREPA. The MDEQ recommends that prospective purchasers or users of this Property undertake appropriate due diligence prior to acquiring or using this Property and undertake appropriate actions to comply with the requirements of Section 20107a of the NREPA.

8. Severability. If any provision of this Restrictive Covenant is held to be invalid by any court of competent jurisdiction, the invalidity of that provision shall not affect the validity of any other provision of this Restrictive Covenant, which shall continue unimpaired and in full force and effect.

9. Authority to Execute Restrictive Covenant. The undersigned person executing this Restrictive Covenant is the Owner, or has the express written permission of the Owner, and certifies that he or she is duly authorized to execute and record this Restrictive Covenant.

IN WITNESS WHEREOF, Wayne County Airport Authority has caused this Restrictive Covenant, RC-RRD-213-10-100, to be executed on this _____.

By: Thomas J. Naughton

Name: Thomas J. Naughton

Title: Interim Chief Executive Officer

Subscribed and sworn before me this 24 day of December, 2011, a Notary Public in and for Wayne County, State of Michigan.

KarenJo Pandone
KarenJo Pandone, Notary Public

My Commission Expires: August 1, 2012

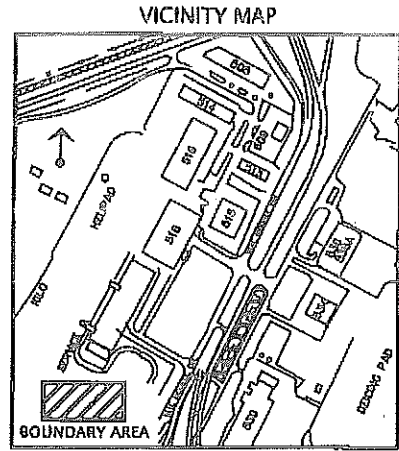
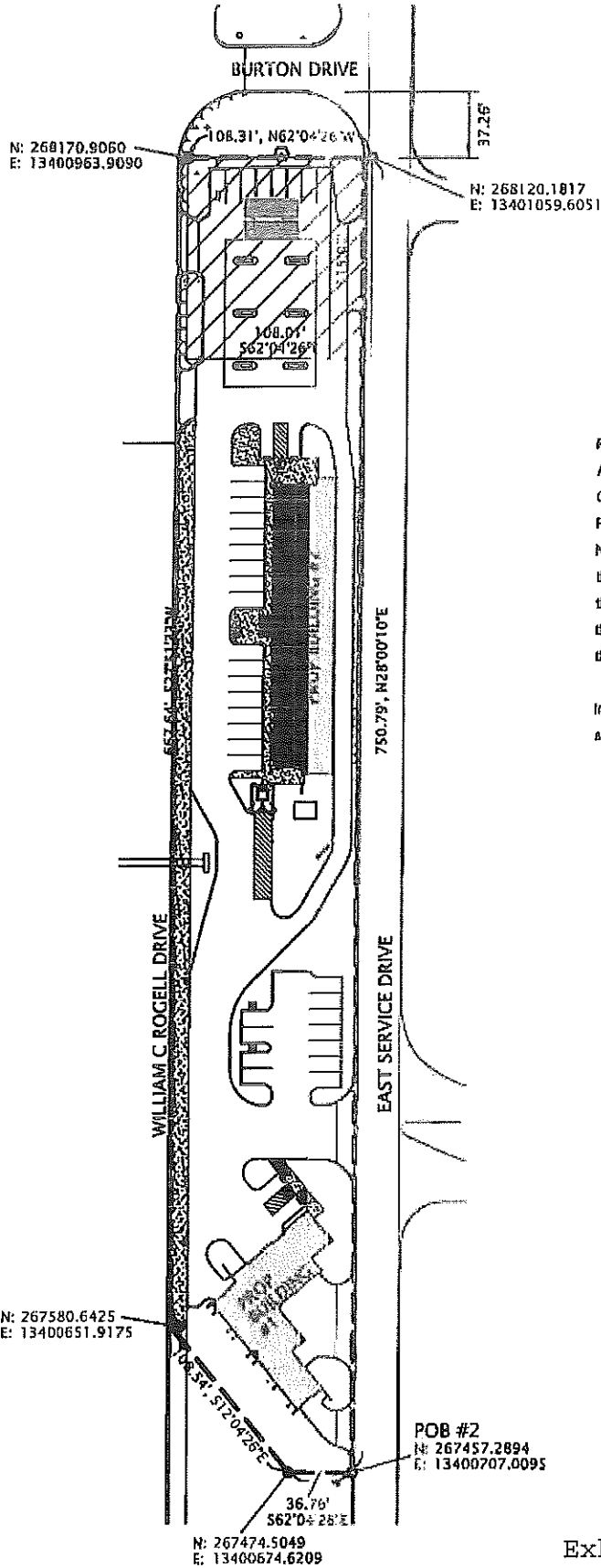
Drafted by: John Kennedy

Name: John Kennedy

Company: Environmental Consulting & Technology, Inc.

Address: 33900 Harper Avenue, Suite 101, Clinton Township, MI 48035

METRO GATEWAY AREA BOUNDARY PARCEL 2



Parcel 2:
A parcel of land in Metro Gateway Area, Detroit Metro Wayne County Airport Authority, City of Romulus, County of Wayne State of Michigan, more particularly described as:
Part of the Section 14, T53, R8E, beginning at a point (POB #2),
N28°00'10"E, 750.79 feet to a corner point;
thence N62°04'28"W, 108.31 feet to a corner point;
thence S27°51'33"W, 667.64 feet to a corner point;
thence S12°04'26"E, 108.54 feet to an angle point;
thence S62°04'28"E, 36.76 feet to the Point of Beginning (POB #2).

In addition, that portion of Parcel 2 described as the Northaty 115.00 feet, shall be subject to the Land and Resource Use Restrictions.

PARCEL 2
1.78 ACRES

NOTES:
1. DESCRIPTION IS BASED ON THIS SITE MAP.

SURVEYOR'S CERTIFICATE

I, William Teaderman, a professional land surveyor registered under the State of Michigan, certify that this map of survey was done in accordance with "Michigan Minimum Standards" and that the survey measurements form and describe the parcel on a mathematically closed figure.



William E. Teaderman 8/12/2010
 William E. Teaderman Date
 Michigan Professional Surveyor No. 16742

LEGEND

- PROPERTY BOUNDARY
- LIMITS OF LAND AND RESOURCE USE RESTRICTIONS

Exhibit 1
Legal Description of Property



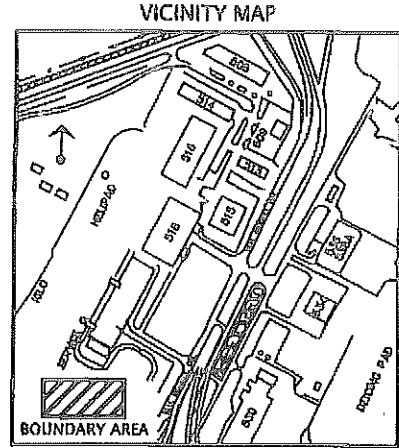
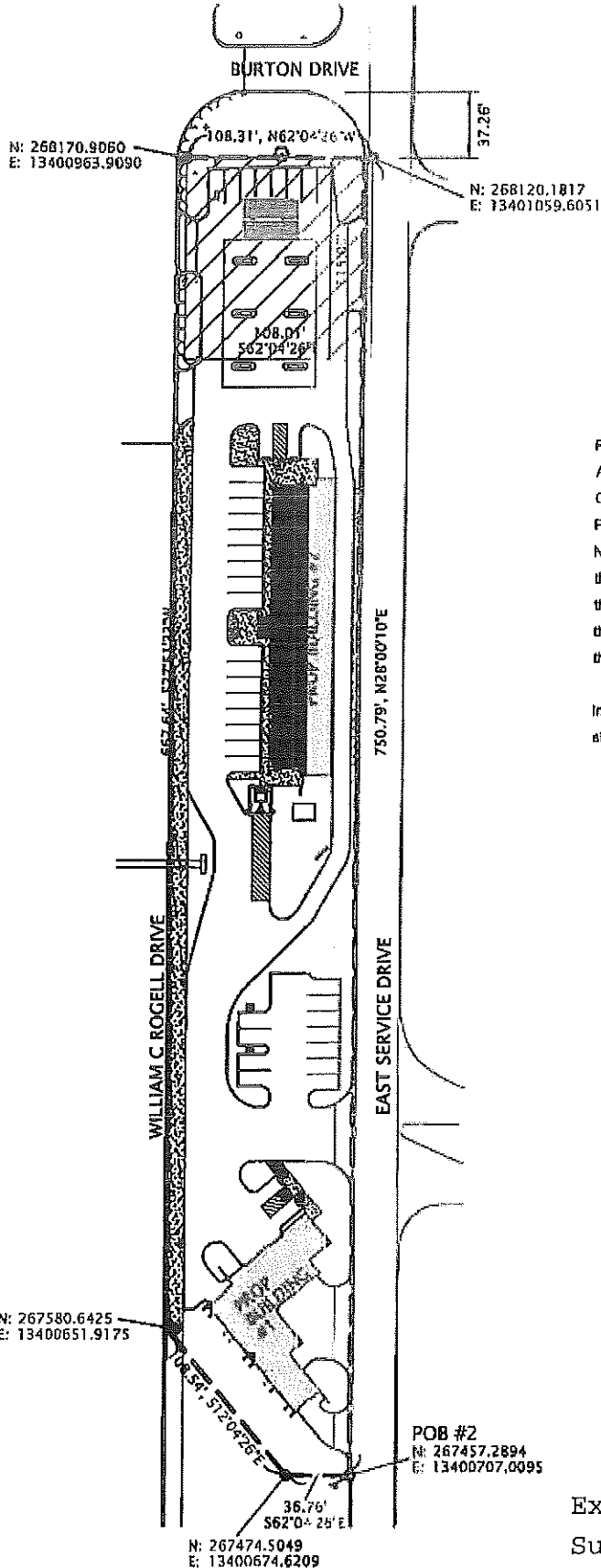
DETROIT METRO.
WAYNE COUNTY
AIRPORT AUTHORITY



NORTHWEST CONSULTANTS, INC.
 CIVIL - STRUCTURAL - TRANSPORTATION
 44878 FORD RD., SUITE A, CANTON, MICHIGAN 48117
 TEL. (734) 454-7566, FAX (734) 464-7536

DATE	08/12/10
SCALE	1"=100'
DESIGNED BY	PK
CHECKED BY	JL
SHEET	1 of 1

METRO GATEWAY AREA BOUNDARY PARCEL 2



Parcel 2:

A parcel of land in Metro Gateway Area, Detroit Metro Wayne County Airport Authority, City of Romulus, County of Wayne State of Michigan, more particularly described as: Part of the Section 14, T33, R8E, beginning at a point (POB #2), N28°00'10"E, 750.79 feet to a corner point; thence N82°04'28"W, 108.31 feet to a corner point; thence S27°51'33"W, 687.84 feet to a corner point; thence S12°04'28"E, 108.54 feet to an angle point; thence S62°04'28"E, 38.76 feet to the Point of Beginning (POB #2).

In addition, that portion of Parcel 2 described as the Northerly 115.00 feet, shall be subject to the Land and Resource Use Restrictions.

PARCEL 2
1.78 ACRES

NOTES:
1. DESCRIPTION IS BASED ON THIS SITE MAP.

SURVEYOR'S CERTIFICATE

I, William Teaderman, a professional land surveyor registered under the State of Michigan, certify that this map of survey was done in accordance with "Michigan Minimum Standards" and that the survey measurements form and describe the parcel as a mathematically closed figure.



William E. Teaderman 8/12/2010
 William E. Teaderman Date
 Michigan Professional Surveyor No. 16742

Exhibit 2
 Survey of Property and Limits of
 Land and Resource Use Restrictions

LEGEND

- PROPERTY BOUNDARY
- LIMITS OF LAND AND RESOURCE USE RESTRICTIONS

<p>DETROIT METRO. WAYNE COUNTY AIRPORT AUTHORITY</p>	<p>NCI NORTHWEST CONSULTANTS, INC.</p> <p>CIVIL - STRUCTURAL - TRANSPORTATION 44078 FORD RD., SUITE A, CANTON, MICHIGAN 48187 TEL (734) 454-7566, FAX (734) 454-7636</p>									
		<table border="1"> <tr><td>DATE</td><td>08/12/10</td></tr> <tr><td>SCALE</td><td>1"=100'</td></tr> <tr><td>DRAWN BY</td><td>PH</td></tr> <tr><td>CHECKED BY</td><td>JL</td></tr> <tr><td>SHEET</td><td>1 of 1</td></tr> </table>	DATE	08/12/10	SCALE	1"=100'	DRAWN BY	PH	CHECKED BY	JL
DATE	08/12/10									
SCALE	1"=100'									
DRAWN BY	PH									
CHECKED BY	JL									
SHEET	1 of 1									

EXHIBIT 3

DESCRIPTION OF ALLOWABLE USES

Nonresidential Land Use

This land use is characterized by any use which is not residential in nature and is primarily characterized by industrial and commercial uses. Industrial uses typically involve manufacturing operations engaged in processing and manufacturing of materials or products. Other examples of industrial uses are utility companies, industrial research and development, and petroleum bulk storage. Commercial uses include any business or income-producing use such as commercial warehouses, lumber yards, retail gas stations, auto dealerships and service stations, as well as office buildings, banks, and medical/dental offices (not including hospitals). Commercial uses also include retail businesses whose principal activity is the sale of food or merchandise within an enclosed building and personal service establishments which perform services indoors such as health clubs, barber/beauty salons, photographic studios, etc.

Any residential use is specifically prohibited from the non-residential land use category. This would include the primary use of the property for human habitation and includes structures such as single family dwellings, multiple family structures, mobile homes, condominiums, and apartment buildings. Residential use is also characterized by any use which is intended to house, educate, or provide care for children, the elderly, the infirm, or other sensitive populations, and therefore could include day care centers, educational facilities, hospitals, elder care facilities, and nursing homes. The use of any accessory building or portion of an existing building as a dwelling unit permitted for a proprietor or storekeeper and their families, located in the same building as their place of occupation, or for a watchman or caretaker is also prohibited. Any authority that allows for residential use of the Property as a legal non-conforming is also restricted per the prohibitions contained in this restrictive covenant.

Wayne County Airport Authority does not have designated zoning requirements for the airport; however, the City of Romulus (City) designates the airport in general, including the Property, as AP – Airport. Zoning of AP allows various, approved land use types consistent with the City zoning ordinances. Uses within Limit of Land Use Restrictions at the Property will continue to be consistent with AP and nonresidential land uses and the provisions described within this RC.

NOTICE OF CORRECTIVE ACTION

MDEQ Reference No. NCA-RRD-213-10-002

This Notice of Corrective Action (Notice) was recorded with the Wayne County Register of Deeds to protect public health, safety, and welfare, and the environment by prohibiting uses of the property located in Romulus, Michigan known as former Building 531 at Detroit Metro Airport owned by Wayne County Airport Authority and legally described in the attached Exhibit 1 (Property) that are inconsistent with the environmental condition of the Property.

The Property is associated with former Building 531 (Facility ID: 00039825) for which a Closure Report (CR) was completed under Part 213, Leaking Underground Storage Tanks, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (NREPA), MCL 324.21301 *et seq.* Corrective actions that were implemented to address environmental contamination are fully described in the CR dated June 20, 2011. A copy of the CR is available from the Michigan Department of Environmental Quality (MDEQ) Remediation and Redevelopment Division District Office.

The CR required the recording of this Notice with the Wayne County Register of Deeds to assure that the use of the Property is consistent with the exposure assumptions used to develop the non-residential cleanup criteria employed by the CR pursuant to Section 21304a(2) of the NREPA and the RBCA process. This Notice is based upon information available at the time the CR was implemented. Failure of the corrective action to achieve and maintain the cleanup criteria and requirements specified in the CR; future changes in the environmental condition of the Property or changes in the cleanup criteria developed under Section 21304a(2) of the NREPA; the discovery of environmental conditions at the Property that were not accounted for in the CR; or use of the Property in a manner inconsistent with the restrictions described below may result in this Notice not being protective of public health, safety, and welfare, and the environment. The restrictions contained in this Notice are based upon information available at the time the CR was implemented by Wayne County Airport Authority. The adequacy of the corrective actions undertaken pursuant to the CR may not have been reviewed by the MDEQ.

The "Survey of Property and Limits of Land and Resource Use Restrictions," attached as Exhibit 2, provides a survey and legal description of the Property and survey and legal descriptions that distinguish those portions of the Property that are subject to the land and resource use restrictions specified in this Notice.

Definitions

For the purposes of this Notice, the following definitions shall apply:

"MDEQ" means the Michigan Department of Environmental Quality, its successor entities, and those persons or entities acting on its behalf. "Owner" means at any given time the then-current title holder of all or any portion of the Property.

"RBCA" means the American Society for Testing and Materials (ASTM) document entitled, "Standard Guide for Risk-Based Corrective Action Applied at Petroleum Release Sites," Designation E 1739-95.

All other terms used in this document which are defined in Part 3, Definitions, of the NREPA; Part 213 of the NREPA; Part 201, Environmental Remediation, of the NREPA; or the Part 201 Administrative Rules (Part 201 Rules), 1990 AACRS R 299.5101 *et seq.*, shall have the same meaning in this document as in Parts 3, 213, and 201, and the Part 201 Rules, as of the date this Notice is filed.

Summary of Corrective Actions

Unleaded gasoline was released from a UST resulting in subsurface contamination on a portion of the property. Elevated concentrations of the analytes were detected in soil. Analytes include benzene, ethylbenzene, 2-methylnaphthalene, naphthalene, toluene, trimethylbenzenes, and xylenes. Current levels of contamination do not allow unrestricted use of the Property. Soils and/or groundwater may be remediated (i.e. soil removal) as a corrective action to eliminate hazards associated with the contamination. With appropriate remediation, the site may be reevaluated.

Without remediation, utility and construction workers shall be required to wear appropriate personal protective equipment to prevent direct contact with contaminated soils. In the event that new buildings are constructed at the affected portion of the Property, an engineered vapor barrier shall be constructed under the new buildings to prevent migration of contamination in the vapor phase into the building at levels that would result in unacceptable exposures through inhalation.

Although groundwater was not observed during investigations and the closure process, groundwater shall not be used for potable purposes.

THEREFORE,

1. Declaration of Land Use Restrictions

a. Prohibited Land Uses. In accordance with the CR, Wayne County Airport Authority, as Owner of the Property, covenants that the Property is subject to the following restriction:

(1) The Owner shall prohibit all uses of portions of the Property designated in Exhibit 2 that are not compatible with the nonresidential uses allowed under Section 21304a(2) of the NREPA, and generally described in the "Description of Allowable Uses," attached as Exhibit 3. Cleanup criteria for land use-based corrective actions are located in the Government Documents Section of the Library of Michigan.

b. Owner Acknowledgements. The Owner also acknowledges that:

(1) If there is any proposed change in the land use at any time in the future, that change may necessitate further evaluation of potential risks to the public health, safety, and welfare, and to the environment and that the MDEQ must be contacted regarding any proposed change in the land use.

Surface and subsurface soils found on the Property must be managed in accordance with the requirements of Sections 20107a, 21304b, and 20120c of the NREPA and other applicable state and federal laws.

2. MDEQ Access. The Owner grants to the MDEQ and its designated representatives the right to enter the Property at reasonable times for the purpose of determining and monitoring compliance with the CR, including the right to take samples, inspect the operation and maintenance of the corrective action measures and inspect any records relating to them, and to perform any actions necessary to maintain compliance with Part 213 and the CR.

3. Conveyance of Property Interest. A conveyance of title, easement, or other interest in the Property shall not be consummated by the Owner without adequate and complete provision for compliance with the terms of the CR and this Notice. A copy of this Notice shall be provided to all future owners, heirs, successors, lessees, easement holders, assigns, and transferees by the person transferring the interest in accordance with Section 20116(3) and Section 21310a(2)(c) of the NREPA.

4. Audits Pursuant to Section 21315 of the NREPA. This Notice is subject to audits in accordance with the provisions of Section 21315 of the NREPA, and such an audit may result in the finding by the MDEQ that this Notice is not protective of the public health, safety, and welfare, and the environment.

5. Term of Notice. This Notice shall run with the Property and is binding on the Owner; future owners; and their successors and assigns, lessees, easement holders, and any authorized agents, employees, or persons acting under their direction and control. This Notice may only be modified or rescinded with the written approval of the MDEQ.

6. Enforcement of Notice. The State of Michigan, through the MDEQ, and Wayne County Airport Authority may individually enforce the restrictions set forth in this Notice by legal action in a court of competent jurisdiction.

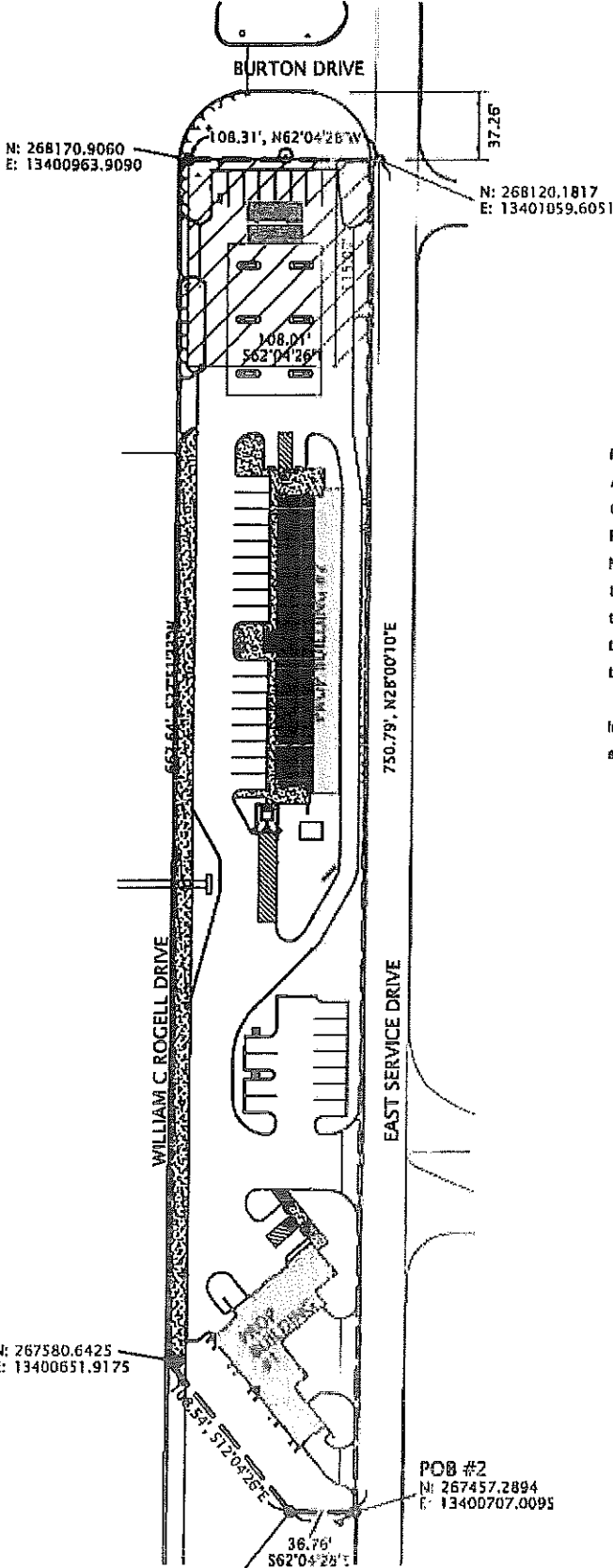
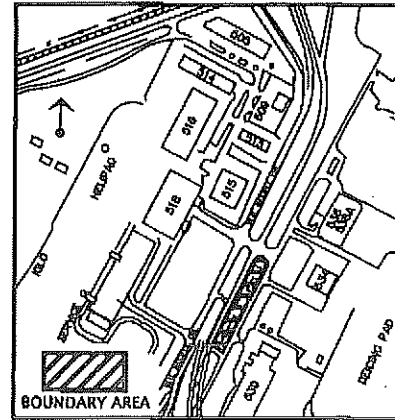
7. Disclaimer. This Property contains regulated substances in excess of the concentrations developed as the unrestricted residential criteria under Section 21304a(2) of the NREPA. The MDEQ recommends that prospective purchasers or users of this Property undertake appropriate due diligence prior to acquiring or using this Property and undertake appropriate actions to comply with the requirements of Section 20107a of the NREPA.

8. Severability. If any provision of this Notice is held to be invalid by any court of competent jurisdiction, the invalidity of that provision shall not affect the validity of any other provision of this Notice, which shall continue unimpaired and in full force and effect.

9. Authority to Execute Notice. The undersigned person executing this Notice is the Owner, or has the express written permission of the Owner, and certifies that he or she is duly authorized to execute and record this Notice.

METRO GATEWAY AREA BOUNDARY PARCEL 2

VICINITY MAP



Parcel 2:

A parcel of land in Metro Gateway Area, Detroit Metro Wayne County Airport Authority, City of Romulus, County of Wayne State of Michigan, more particularly described as:
 Part of the Section 14, T3S, R8E, beginning at a point (POB #2),
 N28°00'10"E, 750.79 feet to a corner point;
 thence N62°04'28"W, 108.31 feet to a corner point;
 thence S27°51'33"W, 687.64 feet to a corner point;
 thence S12°04'28"E, 108.54 feet to an angle point;
 thence S62°04'28"E, 38.78 feet to the Point of Beginning (POB #2).

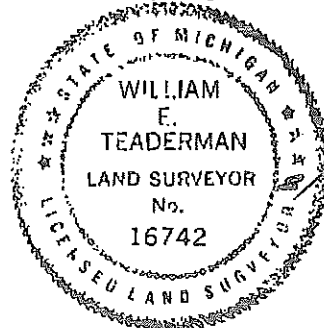
In addition, that portion of Parcel 2 described as the Northernly 115.00 feet, shall be subject to the Land and Resource Use Restrictions.

PARCEL 2
1.78 ACRES

NOTES:
1. DESCRIPTION IS BASED ON THIS SITE MAP.

SURVEYOR'S CERTIFICATE

I, William Teaderman, a professional land surveyor registered under the State of Michigan, certify that this map of survey was done in accordance with "Michigan Minimum Standards" and that the survey measurements form and describe the parcel as a mathematically closed figure.



William E. Teaderman 8/12/2010
 William E. Teaderman
 Michigan Professional Surveyor No. 16742
 Date

LEGEND

- PROPERTY BOUNDARY
- LIMITS OF LAND AND RESOURCE USE RESTRICTIONS

Exhibit 1
Legal Description of Property



DETROIT METRO.
WAYNE COUNTY
AIRPORT AUTHORITY



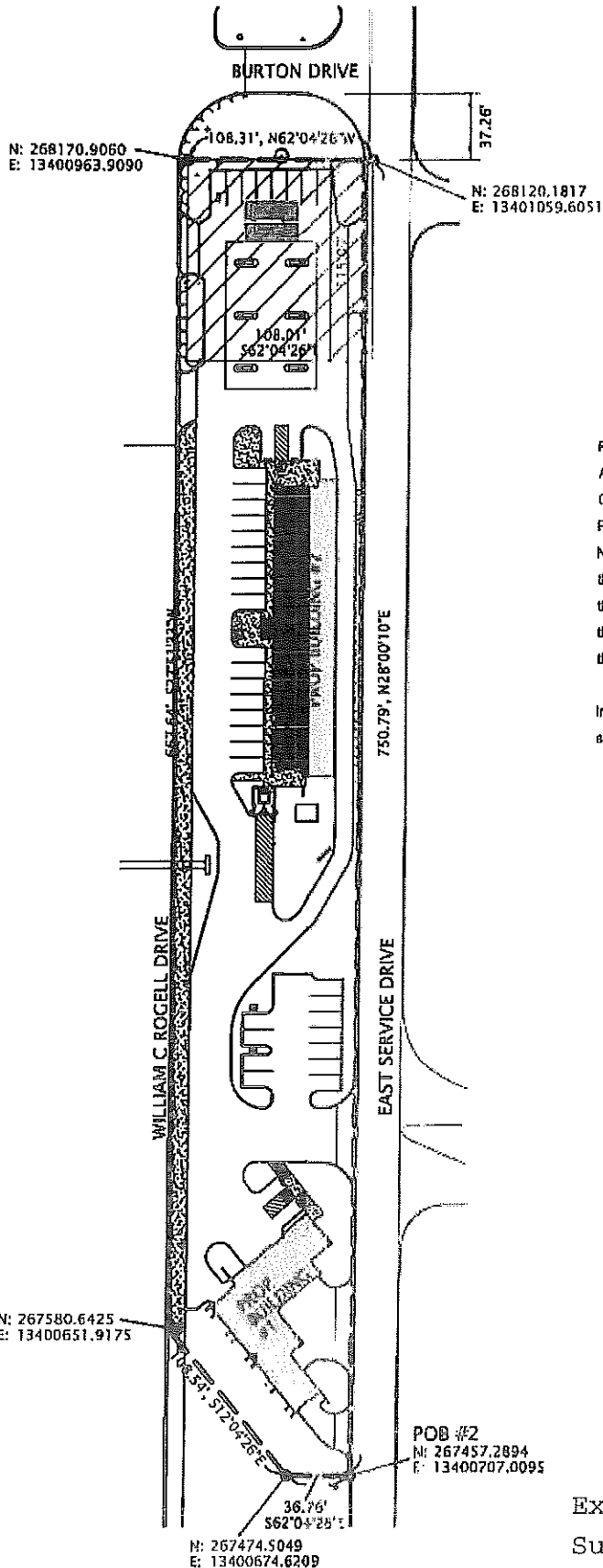
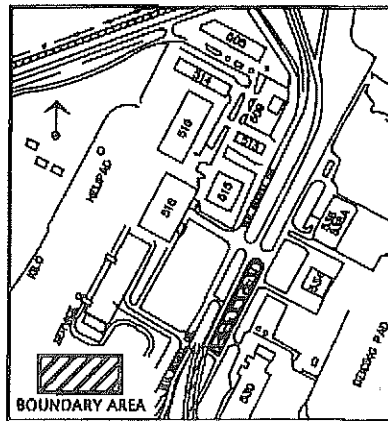
NORTHWEST CONSULTANTS, INC.

CIVIL - STRUCTURAL - TRANSPORTATION
 44870 FORD RD., SUITE A, CANTON, MICHIGAN 48187
 TEL. (734) 454-7566, FAX (734) 454-7535

DATE	08/12/10
SCALE	1"=100'
DESIGNED BY	PK
CHECKED BY	JL
SHEET	1 of 1

METRO GATEWAY AREA BOUNDARY PARCEL 2

VICINITY MAP



Parcel 2:

A parcel of land in Metro Gateway Area, Detroit Metro Wayne County Airport Authority, City of Romulus, County of Wayne State of Michigan, more particularly described as:
Part of the Section 14, T3S, R9E, beginning at a point (POB #2),
N28°00'10\"/>

In addition, that portion of Parcel 2 described as the Northernly 115.00 feet, shall be subject to the Land and Resource Use Restrictions.

PARCEL 2
1.78 ACRES

NOTES:

1. DESCRIPTION IS BASED ON THIS SITE MAP.

SURVEYOR'S CERTIFICATE

I, William Teaderman, a professional land surveyor registered under the State of Michigan, certify that this map of survey was done in accordance with "Michigan Minimum Standards" and that the survey measurements form and describe the parcel as a mathematically closed figure.



William E. Teaderman 8/12/2010
William E. Teaderman
Michigan Professional Surveyor No. 16742

Exhibit 2
Survey of Property and Limits of
Land and Resource Use Restrictions

LEGEND

- PROPERTY BOUNDARY
- LIMITS OF LAND AND RESOURCE USE RESTRICTIONS

DATE	08/12/10
SCALE	1"=100'
DESIGNED BY	PK
CHECKED BY	A
SHEET	1 of 1

	DETROIT METRO. WAYNE COUNTY AIRPORT AUTHORITY	NORTHWEST CONSULTANTS, INC. CIVIL - STRUCTURAL - TRANSPORTATION 44878 FORD RD., SUITE A, CANTON, MICHIGAN 48187 TEL: (734) 454-7566, FAX: (734) 454-7635
	DATE: 08/12/10 SCALE: 1"=100' DESIGNED BY: PK CHECKED BY: A SHEET: 1 of 1	

EXHIBIT 3

DESCRIPTION OF ALLOWABLE USES

Nonresidential Land Use

This land use is characterized by any use which is not residential in nature and is primarily characterized by industrial and commercial uses. Industrial uses typically involve manufacturing operations engaged in processing and manufacturing of materials or products. Other examples of industrial uses are utility companies, industrial research and development, and petroleum bulk storage. Commercial uses include any business or income-producing use such as commercial warehouses, lumber yards, retail gas stations, auto dealerships and service stations, as well as office buildings, banks, and medical/dental offices (not including hospitals). Commercial uses also include retail businesses whose principal activity is the sale of food or merchandise within an enclosed building and personal service establishments which perform services indoors such as health clubs, barber/beauty salons, photographic studios, etc.

Any residential use is specifically prohibited from the non-residential land use category. This would include the primary use of the property for human habitation and includes structures such as single family dwellings, multiple family structures, mobile homes, condominiums, and apartment buildings. Residential use is also characterized by any use which is intended to house, educate, or provide care for children, the elderly, the infirm, or other sensitive populations, and therefore could include day care centers, educational facilities, hospitals, elder care facilities, and nursing homes. The use of any accessory building or portion of an existing building as a dwelling unit permitted for a proprietor or storekeeper and their families, located in the same building as their place of occupation, or for a watchman or caretaker is also prohibited. Any authority that allows for residential use of the Property as a legal non-conforming is also restricted per the prohibitions contained in this restrictive covenant.

Wayne County Airport Authority does not have designated zoning requirements for the airport; however, the City of Romulus (City) designates the airport in general, including the Property, as AP – Airport. Zoning of AP allows various, approved land use types consistent with the City zoning ordinances. Uses within Limit of Land Use Restrictions at the Property will continue to be consistent with AP and nonresidential land uses and the provisions described within this NCA.

Deed Restriction
Former Signature Fuel Farm



NOTICE TO LOCAL UNIT(S) OF GOVERNMENT OF LAND USE RESTRICTIONS

This information and form is required under Sections 21310a(5) and 21316 of Part 213, Leaking Underground Storage Tanks (LUST), of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. Failure to comply with the provisions of this Act may result in civil fines not to exceed \$10,000 for each day the violation continues or failure to comply continues.

Instructions: (1) Use this form to provide notice of land use restrictions that are part of the corrective action plan to the Local Unit(s) of Government (LUG). (2) If corrective action is based on the use of institutional controls regarding off-site migration of regulated substances, submit a draft copy of this notification with the corrective action plan and wait for Storage Tank Division (STD) approval before providing notice to the LUG. If the institutional controls are for on-site contamination, the owner/operator may proceed with providing notice to the LUG. (3) Send the notice to the city, village or township clerk. Provide a copy to the County/District Health Department if groundwater exceeds Tier 1 residential criteria. (4) Submit a copy of the notice and proof of providing the notice with the Closure Report (EQP 3843) to the appropriate STD District Office listed on the back of the Closure Report Cover Sheet. This notice does not constitute a warranty or representation of any kind by the State of Michigan that the corrective actions performed in accordance with this notice will result in the achievement of the remedial criteria established by Law, or that the property is suitable for any particular use.

City of Romulus Wayne County
 Name of Local Unit of Government Name of Local Unit of Government

Notice to the Local Unit of Government Receiving this Form:

A corrective action plan for the site named below has been developed as a result of a release from an underground storage tank. This form and the attachments are to provide the local unit(s) of government notice of the land use restrictions that are part of the corrective action plan. A copy of the institutional control mechanism(s) in the form of a Corrective Action Notice to Register of Deeds, and/or Restrictive Covenant, and/or alternate mechanism is/are attached. The attached institutional control mechanism(s) describe the land use restrictions and the land where the restrictions apply.

Owner or Operator: Wayne County – Detroit Metropolitan Airport

Site Name: Detroit Metropolitan Airport

Site Address: L.C. Smith Terminal –Mezzanine City: Detroit State: MI Zip: 48242

Contact Person: Mr. Andrew Funchar, Jr. Phone Number: (734) 942-3508

Mailing Address: Detroit Metro Airport Bldg. 348 City: Detroit State: MI Zip: 48242

Qualified Underground Storage Tank Consultant :Hydro-Logic Associates, Inc.

Address: 10291 E. Grand River Avenue, Suite B City: Brighton State: MI Zip: 48116

Contact Person: Kenneth Henderson Phone Number: (810) 220-3202

I hereby attest to the accuracy of the statements in this document and all attachments. I further certify that the language on this form has not been modified.

Edward P. Mjama
 Owner or Operator's Signature

5-15-02
 Date

Signed in the presence of:

Witness

[Handwritten Signature]

Witness

[Handwritten Signature]

Print Witness' Name*

Patrick Hedenk

Print Witness' Name*

Terry Ahwal

* The notary shall not also serve as a witness.

The foregoing instrument was acknowledged before me this 12th day of April, 2002,
(month) (year)
by Thomas M. Kamm.

[Handwritten Signature]

, Notary Public

WAYNE County, MI
(Insert County) (Insert State)

My Commission Expires: 1/10/2003

Drafted by:

Hydro-Logic Associates, Inc.
Company Name

Kenneth Henderson
Print Name of Drafter

10291 E. Grand River Avenue, Suite B, Brighton, MI 48116
Company Address

NOTARY PUBLIC
My Commission Expires 1/10/2003

10/1/02

* The land use that was the basis of corrective action at this site is as follows:

X Commercial

Industrial

If there is a proposed change in the land use at any time in the future, that change may necessitate further evaluation of potential risks to the public health, safety, and welfare and to the environment. The Department of Environmental Quality shall be contacted regarding any proposed change in the land use.

This notice is being filed by the property owner or with the express written permission of the property owner.

The filing of this notice is consistent with the provisions of Section 21310a(1) of Part 213. The corrective action plan cited above will be maintained on file at the STD District Office located at

SE Michigan District Office, 38980 Seven Mile Road, Livonia, Michigan

I hereby attest to the accuracy of the statements in this document and all attachments. I further certify that the language on this form has not been modified in any way.

Edward N. Mjama 5-15-02
Legal Titleholder or Authorized Representative's Signature Date

Print Legal Titleholder or Authorized Representative's Name

IN WITNESS WHEREOF, the said Owner of the above described property has caused the Institutional Control to be executed on the 15th day of May, 2002.
(month) (year)

Witness

Witness

Patrick [Signature]
Print Witness' Name*

Terry Ahwal
Print Witness' Name*

* The notary shall not serve as a witness.

The foregoing instrument was acknowledge before me this _____ day of _____, _____
(month) (year)

by [Signature]

Karen D. Jones
, Notary Public

Wayne County, Michigan
(Insert County) (Insert State)

My Commission Expires: 11-22-04

KAREN D. JONES
Notary Public, WAYNE County, MI
My Commission Expires Nov 22, 2004

Drafted by:

Hydro-Logic Associate, Inc.
Company Name

Kenneth Henderson
Print Name of Drafter

10291 E. Grand River Ave., Suite B, Brighton, MI 48116
Company Address

COPY

Primary Control #
01-50101-

Secondary Control #
02-50-001-

Resolution #
01-999

RESTRICTIVE COVENANT

The below listed owner/operator has implemented a corrective action plan requiring institutional controls in the form of a restrictive covenant. The corrective action plan was developed as a result of a release from a Leaking Underground Storage Tank(s) (LUST) and was prepared pursuant to the provisions in Section 21310a(2) of Part 213. Regulated substances were discovered during the investigation and/or removal of Underground Storage Tanks (USTs). The corrective action plan cited above will be maintained on file at the STD District Office located at

SE Michigan District Office, 38980 Seven Mile Road, Livonia, Michigan

This restrictive covenant is filed with the County Register of Deeds and covers the land identified in the following, and more fully described in Attachment A, attached. (*Attach a legal property description as Attachment A for the land where the restrictive covenant would apply, and a survey map of the areas addressed by this restrictive covenant.*) The restrictive covenant defines the areas addressed by the corrective action plan and the scope of any land use or resources limitations. The survey defining the areas addressed by the corrective action plan is attached. (*Describe the scope of any land use or resource use limitations.*)

See Exhibit A for a survey map of the portion of the property where institutional controls would apply. See Exhibit B for a survey map of the portion of the site (including latitude and longitude coordinates) addressed by the Restrictive Covenant. See Exhibit C for land/resource use limitations.

The restrictive covenant is being filed by the below listed legal titleholder or with the express written permission of the legal titleholder. (*Attach permission statement from the legal titleholder if he/she is not signing this document.*)

Owner/Operator implementing the corrective action plan: Wayne County – Detroit Metropolitan Airport

Release Date(s): September 21, 1999 and September 27, 1999

County where deed is registered: Wayne

Common description of land, township/city, County: Detroit Metropolitan Airport, Southwest Corner of Goddard and East Service Roads; North Side of Goddard Road across from East Service Road, Romulus, Michigan 48174. See Exhibit A for a survey map of the portion of the property where institutional controls would apply.

Now Therefore (Legal Titleholder Name and Address) Detroit Metropolitan Airport, L.C. Smith Terminal – Mezzanine, Detroit, Michigan 48242

(hereinafter referred to as the "titleholder"), hereby imposes restriction on the property and covenants and agrees that:

1. The Titleholder shall restrict activities on the property that may interfere with corrective action, operation and maintenance, monitoring, or other measures necessary to assure the effectiveness and integrity of the corrective action.
2. The Titleholder shall restrict activities that may result in exposure to regulated substances above levels established in the corrective action plan.
3. The Titleholder shall prevent a conveyance of title, an easement, or any other interest in the property from being consummated without adequate and complete provision for compliance with the corrective action plan and prevention of exposure to regulated substances described in item 2 above.
4. The Titleholder shall grant to the Department of Environmental Quality (Department) and its designated representatives the right to enter the property at reasonable times for the purpose of determining and monitoring compliance with the corrective action plan, including but not limited to the right to take samples, inspect the operation of the corrective action measures, and inspect records.
5. Soil shall not be removed from the property described herein, unless it is characterized to determine if it can be relocated without posing a threat to the public health, safety, welfare or environment in the new location.
6. The state may enforce the restrictions set forth in the covenant by legal action in a court of appropriate jurisdiction.

The restrictions and other requirements described in this Restrictive Covenant shall run with the land and be binding to the titleholder's successors, assigns, and lessees or their authorized agents, employees or persons acting under their direction or control. The restrictions shall apply until the Department determines that regulated substances no longer present an unacceptable risk to the public health, safety or welfare or to the environment. A copy of this Restrictive Covenant shall be provided to all heirs, successors, assigns, and transferees.

This Restrictive Covenant shall not be amended, modified or terminated except by a written instrument executed by and between the Titleholder at the time of the proposed amendment, modification, or termination, and the Department. Within five (5) days of executing an amendment, modification or termination of the Restrictive Covenant, the Titleholder shall record such amendment, modification or termination with the County Register of Deeds, previously named, and within five (5) days thereafter, the Titleholder shall provide a true copy of the recorded amendment, modification or termination to the Department.

If any provision of this Restrictive Covenant is also the subject of any laws or regulations established by any federal, state or local government, the stricter of the two standards shall prevail.

The undersigned person, if executing this Restrictive Covenant on behalf of the Titleholder, represents and certifies that they are duly authorized and have been fully empowered to execute and deliver this Restrictive Covenant.

I hereby attest to the accuracy of the statements in this document and all attachments. I further certify that the language on this form has not been modified in any way.

Edward H. McNamara
Legal Titleholder or Authorized Representative's Signature

3-26-02
Date

Edward H. McNamara
Print Legal Titleholder or Authorized Representative's Name

IN WITNESS WHEREOF, the said Titleholder of the above described property has caused the Restrictive Covenant to be executed on the 26 day of MARCH, 02.
(month) (year)

Signed in the presence of:

Witness Wayne Henderson

Witness _____

Print Witness' Name* Patrick Henderson

Print Witness' Name* _____

* The notary shall not also serve as a witness.

The foregoing instrument was acknowledged before me this 12th day of April, 2002,
(month) (year)
by THOMAS M. KERR

Thomas M. Kerr

, Notary Public

WAYNE County, MI
(Insert County) (Insert State)

My Commission Expires: 1/11/2003

Drafted by:

Hydro-Logic Associates, Inc.
Company Name

Kenneth Henderson
Print Name of Drafter

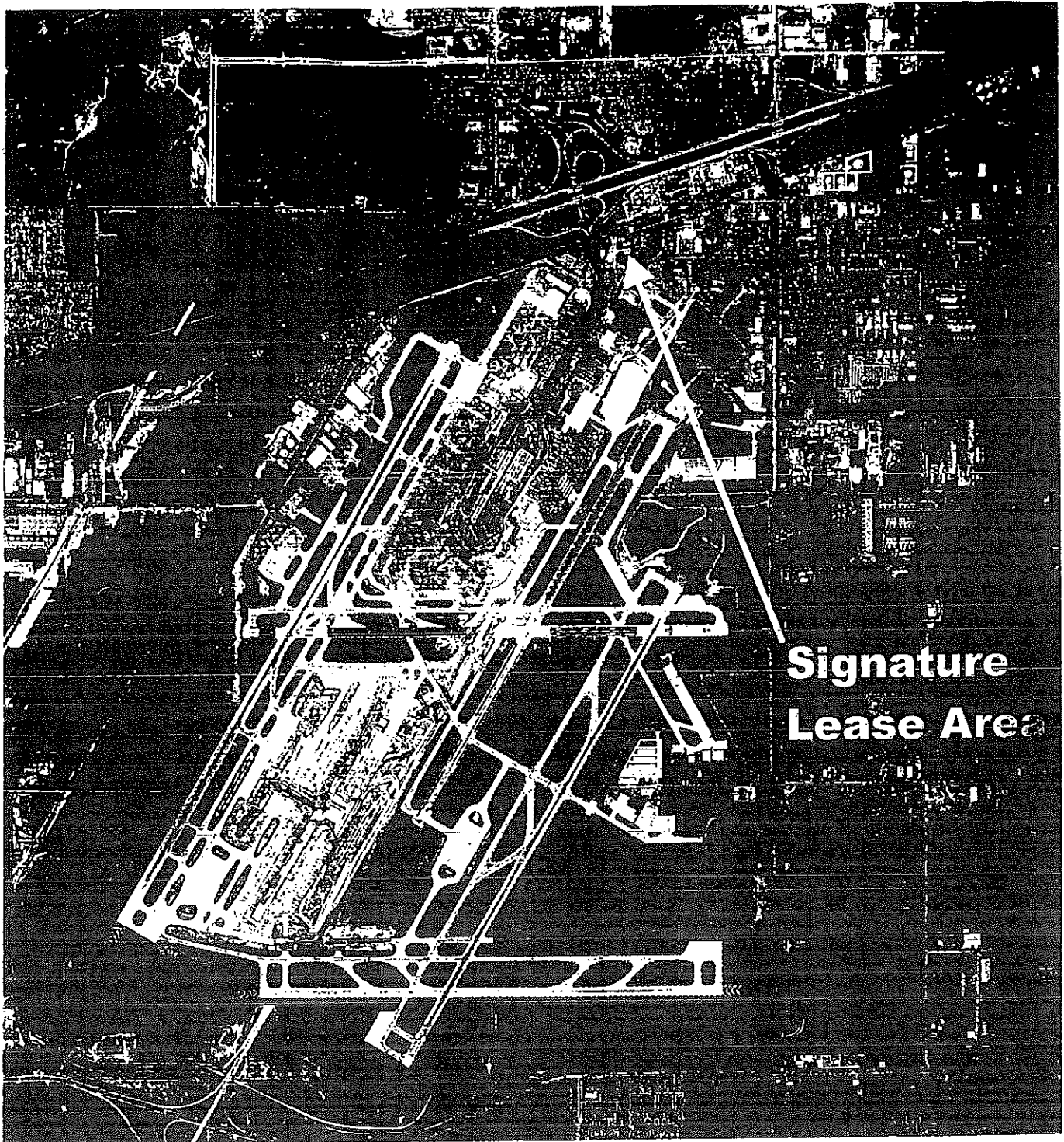
10291 E. Grand River Avenue, Suite B, Brighton, MI 48116
Company Address

Notary Public
My Commission Expires

615-244-1111

EXHIBIT A

**SITE LOCATION MAP AND
SIGNATURE FLIGHT SUPPORT
LEASE AREA BOUNDARY**



Map adapted from USGS 7.5 minute topographic map: Flatrock_NE, MI

LEGEND



3000

0

3000 Feet

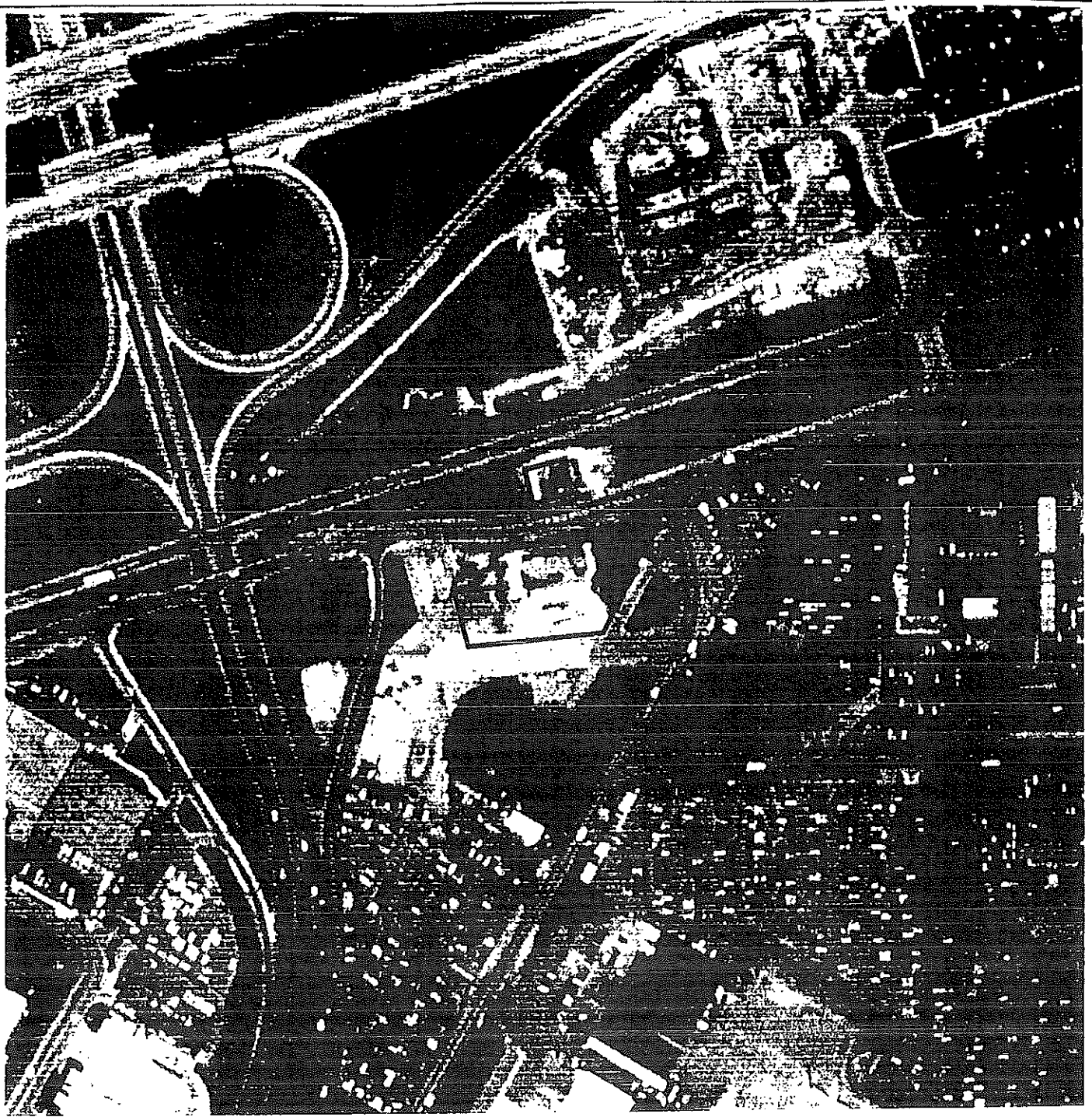


Detroit Wayne Metropolitan Airport
Detroit, Michigan



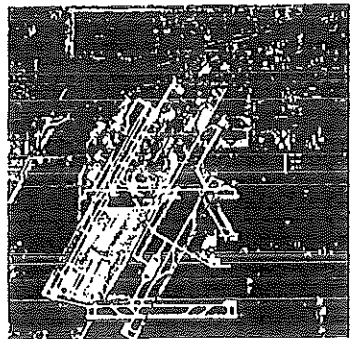
Figure 1

File: dtw_survey1.apr
Summit Proj. No.: 1192-023
Plot Date: 04-17-01
Arc Operator: HRV
Reviewed by: KH



Map adapted from USGS 7.5 minute topographic map: Flatrock_NE, MI

LEGEND



Signature Flight Support Lease
Area Boundary

Detroit Wayne Metropolitan Airport
Detroit, Michigan

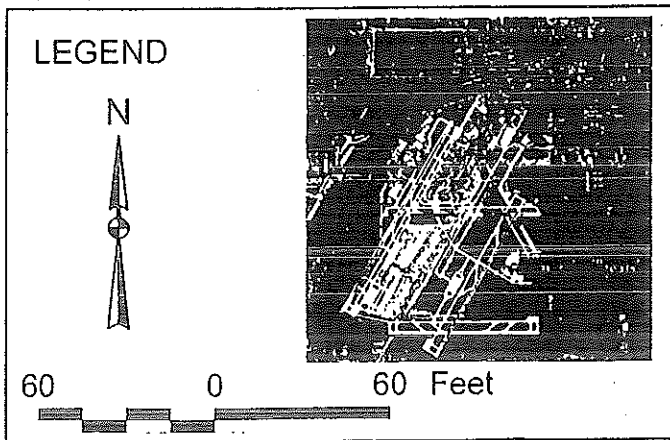


Figure 2

File: dtw_survey1.apr
Summit Proj. No.: 1192-023
Plot Date: 04-17-01
Arc Operator: HRV
Reviewed by: KH



Map adapted from USGS 7.5 minute topographic map: Flatrock_NE, MI



Signature Flight Support Lease
 "Area of Restrictive Covenant"

Detroit Wayne Metropolitan Airport
 Detroit, Michigan

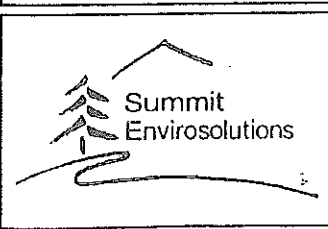
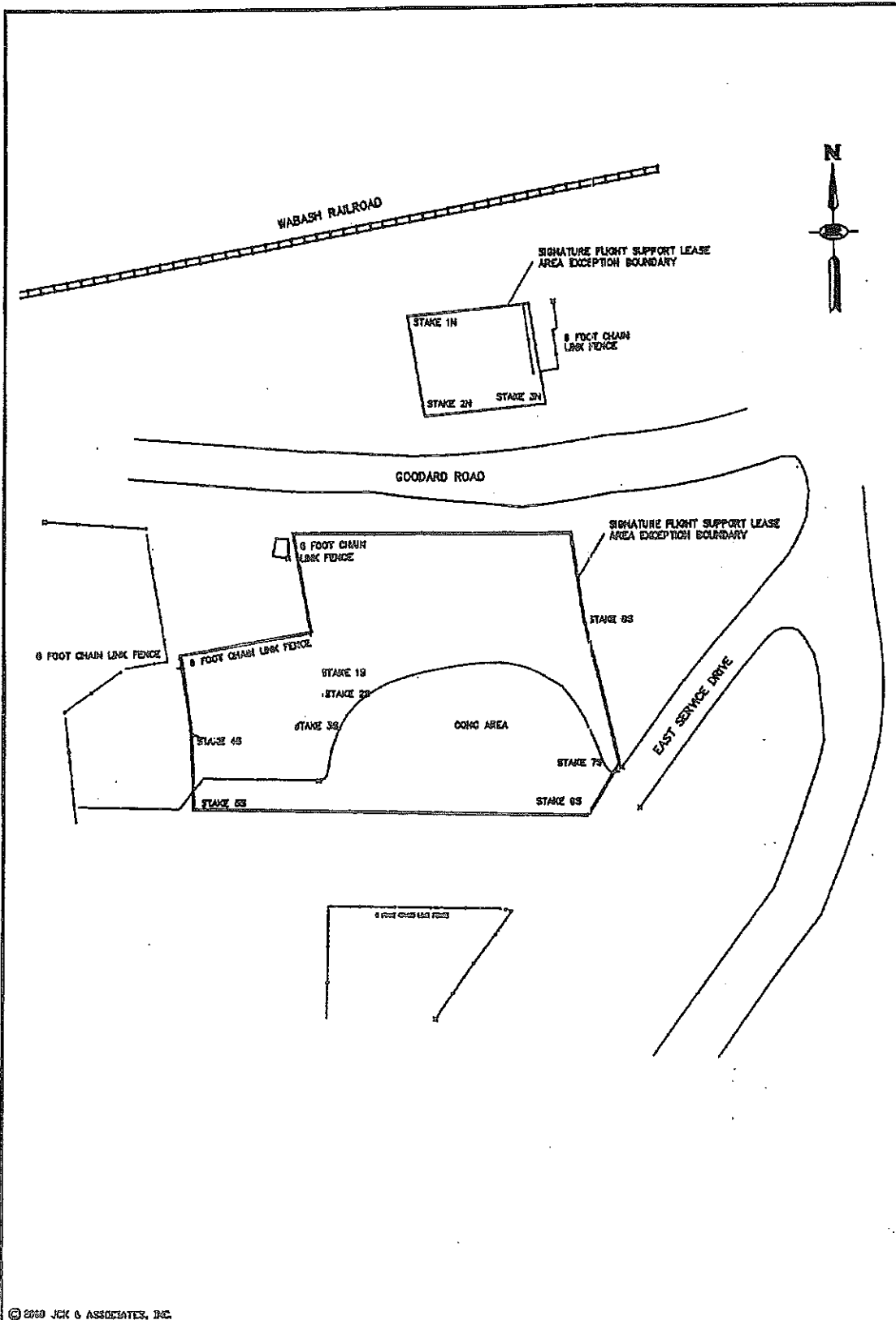


Figure 3

File: dtw_survey1.apr
 Summit Proj. No.: 1192-023
 Plot Date: 04-17-01
 Arc Operator: HRV
 Reviewed by: KH

EXHIBIT B

**AREA OF RESTRICTIVE COVENANT
SURVEY MAP**



© 2000 JCK & ASSOCIATES, INC.

SIGNATURE FLIGHT SUPPORT LEASE
AREA EXCEPTION BOUNDARY

JCK
 & associates, inc.
 45650 GRAND RIVER AVE.
 NOVI, MI 48374

SIGNATURE FLIGHT SUPPORT CORPORATION
 DETROIT METRO AIRPORT
 EXHIBIT "A"

PHONE (248) 348-2680

Date	Drawn	Checked	Job No.
12-20-00	RRH	LLC	P-7595

Exhibit C

Additional Land Use/Resource Use Limitations

Maintenance of asphalt cap is required. Construction of a building within the area of the site addressed by the restrictive covenant is prohibited. Soil must be properly characterized to determine whether it requires disposal in a Type II landfill before it can be removed from the area of the site addressed by the restrictive covenant.

Individuals with the potential to come into direct contact with the soil (i.e. utility workers) shall be notified prior to working within the area of the site addressed by the restrictive covenant.

Although potable ground water was not encountered, shallow wells (less than 20 feet in depth), for the purpose of obtaining drinking water is prohibited from within the area of the site addressed by the restrictive covenant. The placement of drinking water wells on site will be constructed to prevent shallow ground water, if encountered, from impacting the lower aquifer.

Deed Restriction
FedEx Building 714

