

COPY

Phase I Environmental Site Assessment

**AT&T Metro West HQ
31100 Plymouth Road
City of Livonia
Wayne County, Michigan**

September 4, 2012

Superior Project No. BC3472.00

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EXECUTIVE SUMMARY

Superior Environmental Corp (Superior) has conducted a Phase I Environmental Site Assessment (ESA) in accordance with the current American Society for Testing and Materials standard (ASTM E1527-05) for the property described below:

Property/Project Name:

AT&T Metro West HQ

Parcel Address:

31100 Plymouth Road, City of Livonia, Wayne County, Michigan

Client:

AT&T Services Inc.

Intended User:

AT&T Services Inc.

Permanent Parcel Tax/Property ID:

103-99-0021-000

Property Size:

Approximately 4.87 acres

Zoning:

C-2 (General Business)

Improvements:

One approximately 36,336 square foot commercial building

Current Use:

Vacant

Water/Sewer:

Municipal water and sewer

Heating Source:

Natural gas

Historic Use:

Residential (at least 1905 to approximately early 1970s)
Michigan Bell Telephone/AT&T Metro West HQ (at least 1973 to 2012)

Adjacent Property Use:

North: Parking lot with U.S. Post Office beyond
East: Vacant commercial building
South: Plymouth Road with Disabled American Veterans, Elk Lodge, and commercial retail strip mall located beyond
West: C&C Underwriters and insurance offices with Brake Center of Livonia located beyond

On-Site *Recognized Environmental Conditions (RECs):*

None

Off-Site *RECs:*

- The potential for groundwater contamination associated with the southwest neighboring property to migrate onto the Subject Property.

Historical RECs (HRECs):

None

Exceptions and Significant Assumptions:

Historical information back to the Subject Property's first known development was not reasonably attainable due to the presence of residences on the Subject Property in 1937 (based on aerial photographs) and the likely presence of residences in 1905 (based on historical topographic maps).

"Data failure" occurred during the Subject Property research between the years 1905 and 1936, 1940 and 1949, and 1961 and 1967.

It should also be noted that title documentation was not provided to Superior during the course of this Phase I ESA and as such would be considered a limitation to this report. However, these exceptions are not likely to materially impact the conclusions of this report.

Superior has performed a Phase I ESA in conformance with the scope and limitations of the ASTM Practice E 1527-05 Standard for the Subject Property. Any exception to, or deletions from, this practice are described in Sections 1.5 and 10.0 of this report.

**PHASE I ENVIRONMENTAL SITE ASSESSMENT
AT&T METRO WEST HQ
31100 PLYMOUTH ROAD
CITY OF LIVONIA, WAYNE COUNTY, MICHIGAN
SUPERIOR PROJECT NO. BC3472.00
SEPTEMBER 4, 2012**

1.0 INTRODUCTION

AT&T Services Inc. contracted Superior Environmental Corp (Superior) to perform a Phase I Environmental Site Assessment (ESA) on the commercial property located at 31100 Plymouth Road in the City of Livonia, Wayne County, Michigan (Subject Property). Superior has prepared this report solely for the use of AT&T Services Inc.

The Subject Property is owned by CEM Wildcat LLC and consists of a portion of a larger parcel of land that encompasses approximately 4.87 acres and is identified as Tax Identification Number 103-99-0021-000. An approximately 36,336 square foot commercial building is located on the western central portion of the Subject Property with the eastern portion serving as parking. The Subject Property is currently vacant of operations; however it was recently operated as the Metro West HQ for AT&T.

1.1 Author and Date Prepared

Superior was retained by AT&T Services Inc. to prepare a Phase I ESA in accordance with the American Society for Testing and Materials (ASTM) Standard E 1527-05. This report was prepared by Holly Fink, Field Scientist, and overseen and reviewed by Karl Primdahl, Senior Project Manager, both representatives of Superior. Ms. Fink's and Mr. Primdahl's credentials can be found in Appendix A. Mr. Primdahl meets the definition of "environmental professional" as defined in 40 CFR §312.10. The ESA was completed on September 4, 2012.

1.2 Purpose

The objective of this Phase I ESA was to determine whether past or present activities on or adjacent to the Subject Property may have impacted the Subject Property soil and/or groundwater. The Phase I ESA's purpose is to identify *Recognized Environmental Conditions (RECs)* in connection with the Subject Property. A *REC* means "the presence or likely presence of any hazardous substances or petroleum products on a property under conditions that indicate an existing release, a past release, or a material threat of a release of any hazardous substances or petroleum products into structures on the property or into the ground, groundwater, or surface water of the property." The term is not intended to include "*de minimis*" conditions that generally do not present a material risk of harm to public health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies.

This report is intended to permit AT&T Services Inc. to satisfy one of the requirements to qualify for the innocent landowner defense under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) and under Part 201 of Michigan's Natural Resources Environmental Protection Act P.A. 451 of 1994, as amended

(MNREPA). This report comprises "all appropriate inquiry into the previous ownership and uses of the property consistent with good commercial or customary practice" as defined in 42 U.S.C.A. §9601(35)(b), as amended, and §20126(3) (h) of Part 201 of Michigan's P.A. 451 of 1994, as amended (MNREPA).

It is also the intention of Superior that this report permit AT&T Services Inc. to satisfy one of the requirements to qualify for the bona fide prospective purchaser and contiguous property owner provisions defined under CERCLA §107(r) and 107(q), respectively.

1.3 Detailed Scope of Services

This ESA was undertaken to identify *RECs* in connection with the Subject Property, including hazardous substances within the limits of the Subject Property and/or as visually observed on immediately adjacent properties at the time of Superior's site reconnaissance.

In accordance with the ASTM Practice E 1527-05, Superior conducted a site reconnaissance of the Subject Property, noted use of adjacent properties, and conducted a historical and regulatory records search. No subsurface investigation or sampling of environmental media was undertaken as part of this ESA. The scope of services included, but was not limited to, the following:

- Visual observations of the Subject Property, structures, and surrounding properties were made to identify potential sources or indications of hazardous substance contamination, such as, underground storage tanks (USTs), aboveground storage tanks (ASTs), potential sources of polychlorinated biphenyls (PCBs), chemicals and hazardous materials, and areas with surface stains or distressed vegetation.
- Subject Property representatives and county and local officials were interviewed regarding possible past or present use of potentially hazardous materials.
- A review of available federal and state databases for contaminated sites and environmental compliance to identify use, generation, storage, treatment, or disposal of hazardous materials or releases of such materials that may impact the Subject Property.
- A review of publicly available information pertaining to regional geology to approximate the potential groundwater flow direction and geologic conditions in the vicinity of the Subject Property.

Superior has performed a Phase I ESA in conformance with the scope and limitations of the ASTM Practice E 1527-05 for the Subject Property. Any exception to, or deletions from, this practice are described in Section 1.5 and Section 10.0 of this report.

1.4 Significant Assumptions

No significant assumptions were made as part of this Phase I ESA.

1.5 Limitations and Exceptions

The site reconnaissance procedures and this report have been developed considering various federal, state, and local laws and regulations, including the Comprehensive

Environmental Response, Compensation and Liability Act (CERCLA/Superfund) and its 1986 Amendments (SARA), as well as Michigan's P.A. 451 of 1994, as amended.

This study was restricted to observations made during Superior's reconnaissance of the Subject Property and research into its history. This study is not a regulatory compliance audit, and as such, the scope of work of this Phase I ESA did not address compliance of operations with respect to any federal, state, or local statutes, regulations, ordinances, or codes. It also did not include the collection or analysis of any samples of air, soil, wastes, or building materials.

Sketches, floor plans, and maps used in this report are included to aid the visual understanding of the reader and should not be considered surveys or engineering studies. In preparing this report, Superior has relied upon certain verbal information and representations provided by state and local government and Subject Property employees, and upon documents in federal, state, and local government agency files. Superior did not attempt to independently verify the accuracy or completeness of this information, but did not detect any inconsistency or omission of a nature that might call into question the validity of any of this information, except as indicated in the text above. To the extent that the conclusions in this report are based in whole or in part on such information, they are contingent on its validity.

No Phase I ESA can wholly eliminate uncertainty regarding the potential for *RECs*. Performance of this Phase I ESA is intended to reduce, but not eliminate, uncertainty regarding the potential for *RECs* in connection with the Subject Property, recognizing the limits of time and cost.

Appropriate inquiry does not mean an exhaustive assessment of a clean property. This ESA was completed recognizing that there is a point at which the cost of information, or the time required to gather it, outweighs its usefulness and, in fact, becomes a material detriment to the orderly completion of the project in which it is intended to support. Therefore, this ESA was performed balancing the competing goals of limiting costs and time demands in performing the ESA and the reduction of uncertainty about unknown conditions that might have otherwise been resolved from additional information.

Superior represents that, within the limitations of the agreed upon scope of services, this work has been undertaken and performed in a professional manner, in accordance with generally accepted practices, using the degree of skill and care ordinarily exercised by reputable environmental consultants under similar circumstances. No other warranty, expressed or implied, is made. Specifically, Superior does not and cannot represent that the Subject Property contains no hazardous material, oil, or other latent condition beyond that observed by Superior during the Phase I ESA. This report does not warrant against future operations or conditions. It should also be noted that no title documentation was provided to Superior during the course of this Phase I ESA and as such would be considered a limitation to this report. These limitations and exceptions are not likely to have a material impact on the findings and conclusions of this report.

1.6 Data Gaps

Historical information back to the Subject Property's first known development was not reasonably attainable due to the presence of residences in 1937 (based on aerial

photographs) and the likely presence of residences in 1905 (based on historical topographic maps). Based on Superior's past experience and the use of the Subject Property at that time, it is unlikely for the "data failure" to change the conclusions of this report and, thus, the "data failure" does not represent a significant data gap.

"Data failure" occurred during the Subject Property research between the years 1905 and 1936, 1940 and 1949, and 1961 and 1967. Due to the Subject Property's residential status from 1936 through 1967, it is unlikely for operations during these gaps in time to materially affect the conclusions of this report. Accordingly, these "data failures" do not represent a significant data gap.

1.7 Special Terms and Conditions

In preparing this report, Superior made no attempt to independently verify the accuracy or completeness of information received from or reviewed by federal, state, and local regulatory agencies or the entities interviewed during the course of this Phase I ESA.

1.8 User Reliance

This study and report have been prepared on behalf of and for the exclusive use of AT&T Services Inc. solely for use in an environmental evaluation of the Subject Property. This report and the findings contained herein shall not, in whole or in part, be relied upon by any other party, in whole or in part, without the prior written consent of Superior.

2.0 DESCRIPTION

2.1 Location and Legal Description

The Subject Property is located in the southwest ¼ of Section 26, Township 1 South, Range 9 East in the City of Livonia, Wayne County, Michigan. The Subject Property is located north of Plymouth Road and east of Merriman Road (see Figure 1 - Subject Property Location). Site photographs are found in Appendix B and a detailed legal description is provided in Appendix C.

Parcel Address:

31100 Plymouth Road, City of Livonia, Wayne County, Michigan

Parcel Identification Number:

103-99-0021-000

2.2 Site and Vicinity General Characteristics

The Subject Property is located in an area generally consisting of light manufacturing and commercial properties and is zoned C-2 (General Business).

2.3 Current Use of the Subject Property

The Subject Property is currently utilized as the AT&T Metro West Headquarters and is owned by CEM Wildcat LLC.

2.4 Description of the Subject Property

At the time of the site reconnaissance, the Subject Property consisted of one, irregularly-shaped parcel totaling approximately 4.87 acres in size. The Subject Property contains one approximately 36,336 square foot building that was vacant of operations at the time of the reconnaissance with asphalt covered parking areas to the north, east, and west of the building. The Subject Property maintains connections to municipal water, sewer, natural gas, telephone, and electric utilities.

A Site Plan is provided as Figure 2, and site photographs with descriptions are provided in Appendix B.

2.5 Current Uses of Adjoining Properties

The Subject Property is immediately adjoined to the north by the remainder of the parent parcel. A large parking lot is located directly north of the Subject Property with a U.S. Post Office located beyond. The Subject Property is adjoined to the east by a vacant commercial building; to the southeast, beyond Plymouth Road, by The Bone Yard Bar-B-Q restaurant; to the south, beyond Plymouth Road, by the Disabled American Veterans office, the Livonia Elk Lodge, and a small commercial strip mall; to the southwest, beyond Plymouth Road, by a Mobil gas station; and to the west by two small offices and the Brake Center of Livonia located beyond the offices.

3.0 USER PROVIDED INFORMATION

3.1 Title Records

No title documentation was provided to Superior during the course of this Phase I ESA.

3.2 Environmental Liens or Activity and Use Limitations

The User was not aware of any environmental liens and/or AULs for the Subject Property. The records research conducted as part of the Phase I ESA did not identify any information pertaining to environmental liens or activity and use limitations on the Subject Property and the Subject Property was not listed on the Michigan Department of Environmental Quality's (MDEQ's) Remediation Division (RD) perfected environmental lien list.

3.3 Specialized Knowledge

The User did not indicate any specialized knowledge pertaining to the Subject Property nor is the User aware of any additional commonly known or reasonably ascertainable information within the local community that is material to RECs in connection with the Subject Property.

3.4 Valuation Reduction for Environmental Issues

The User representative did not indicate that the purchase price of the Subject Property did not reasonably reflect the fair market value of the Subject Property.

3.5 Reason for Performing Phase I ESA

Superior was retained by AT&T Services Inc. to perform this Phase I ESA as part of their due diligence prior to vacating the Subject Property.

3.6 Intended Use of the Subject Property

AT&T Services Inc. intends to vacate and not renew their lease of the Subject Property. They do not intend to perform further operations on the Subject Property.

4.0 RECORDS REVIEW

4.1 Standard Environmental Record Sources

To facilitate the review of standard environmental record sources, in accordance with ASTM E 1527-05 §8.2.1, Superior contracted with Environmental Data Resources, Inc., (EDR) to gather the available and appropriate governmental agency information. EDR's database search was conducted using the approximate minimum search distances from the Subject Property defined by ASTM E 1527-05 §8.2.1. EDR's Radius Map Report, dated July 24, 2012, is included as Appendix E. The following Sections discuss the sites identified by the EDR report.

Database	Minimum Search Distance	No. of Sites
FEDERAL DATABASES		
National Priority List (NPL)/Superfund	1 mile	0
Delisted NPL site	½ mile	0
NPL Liens	Subject Property	0
Comprehensive Environmental Response, Compensation and Liability Information System (CERCLIS)	½ mile	0
CERCLIS No Further Remedial Action Planned (NFRAP) Sites List	½ mile	0
LIENS 2	Subject Property	0
RCRIS Corrective Action Report (CORRACTS)	1 mile	0
RCRA Administrative Action Tracking System (RAATS)	Subject Property	0
RCRIS/Generator Large, Small, and Conditionally Exempt Small Quantity	Subject Property and/or adjoining properties	4
Hazardous Materials Information Reporting System (HMIRS)	Subject Property	0
US Brownfields	½ mile	0
Material Licensing Tracking System (MLTS)	Subject Property	0
Toxic Release Inventory System (TRIS)	Subject Property	0
Toxic Substances Control Act (TSCA)	Subject Property	0
PCB Activity Database System (PADS)	Subject Property	0
Consent	1 mile	0
Records of Decision (ROD)	1 mile	0
Facility Index System (FINDS)	Subject Property	1
Institutional Controls	Subject Property	0
Engineering Controls	½ mile	0
Emergency Response Notification System (ERNS)	Subject Property	0

Database	Minimum Search Distance	No. of Sites
STATE DATABASES		
State Hazardous Waste Sites (SHWS)	1 mile	3
Deleted SHWS	1 mile	0
State Landfills	½ mile	0
Historic Landfills (HIST LF)	½ mile	0
Leaking Underground Storage Tank (LUST) List	½ mile	17
Registered Underground Storage Tanks (USTs)/Aboveground Storage Tanks (ASTs)	Subject Property and/or adjoining properties	1
Baseline Environmental Assessments (BEAs)	½ mile	5
Activity and Use Limitations (AULs)	½ mile	0
State Registered Brownfields	½ mile	0
Dry Cleaner Sites	½ mile	1
EDR Manufactured Gas Plants	1 mile	0
TRIBAL DATABASES		
Tribal Reservation	1 mile	0
Tribal LUST	½ mile	0
Tribal UST	¼ mile	0

4.1.1 Subject Property Status

The Subject Property parcel address is listed as an AST, FINDS, and RCRA-CESQG site on the databases included in the EDR report. AT&T Michigan was listed as the occupant for the AST site, and Michigan Bell DBA AT&T was listed as the occupant on the remaining two databases. Superior submitted a request pursuant to the Freedom of Information Act (FOIA) to the following divisions of the Southeast Michigan District MDEQ for the Subject Property parcel address: RD, Resource Management Division (RMD), Water Resources Division (WRD) and Air Quality Division (AQD). None of the divisions maintained files for the Subject Property. See Appendix F for copies of the FOIA request documentation.

Superior also conducted a review of the MDEQ Michigan Geological Survey Division (GSD) Oil & Gas Well website in order to determine whether any oil wells existed in the area of the Subject Property. A review of this website uncovered no oil/gas wells in Section 26, Township 1 South, Range 9 East in the City of Livonia, Michigan. The EDR Report confirmed this information.

Remaining Properties Status

EDR's report identified numerous sites listed on the various databases within the ASTM approximate minimum search distances from the Subject Property. Superior has reviewed EDR's data presented for these sites. Evaluation of these sites is based on the information provided, the regulatory status (according to EDR's report), the distance from the Subject Property, and the general hydrogeology of the region. Furthermore, Superior submitted a FOIA request to the Southeast Michigan District MDEQ for (1) One Hour Martinizing of Livonia at 31155 Plymouth Road, (2) 31205 Plymouth Road, (3) Collex Collision Livonia at 11727 Merriman Road, (4) SBC – Michigan at 11770

Merriman Road, (5) M64229 – Livonia Garage at 11780 Merriman Road, (6) 31205 and 31153 Plymouth Road, and (7) Mobil Service Station #05GE4 at 31301 Plymouth Road. The RMD maintained files for Collex Collision Livonia at 11727 Merriman Road and M64229 – Livonia Garage at 11780 Merriman Road. The RD maintained files for all of these sites except 11727 Merriman Road.

The files maintained by the RD for the One Hour Martinizing site located at 31155 Plymouth Road also included the sites located at 31153 Plymouth Road and 31205 Plymouth Road. One Hour Martinizing of Livonia located at 31155 Plymouth Road is located approximately 252 feet south of the Subject Property and is listed as a RCRA-CESQG and FINDS site. 31205 Plymouth Road is located approximately 288 feet south southwest of the Subject Property and is listed as a SHWS site. 31205 and 31153 Plymouth Road is listed as a BEA site. The file maintained by the RD for these sites consisted of several letters of correspondence and environmental reports. Specifically, a BEA for these sites completed on August 8, 2006 by The Mannik & Smith Group, Inc. stated that analytical results of an environmental report completed on July 10, 2006 by Shaw Environmental Services stated that impacted soil was identified that exceeded the MDEQ's Generic Residential Cleanup Criteria (GRCC) at various sample locations. Impacted groundwater was identified above GRCC at various locations on the site. It was stated that "the general location of contamination is located on the northern and western sides of the site." Groundwater was identified to be impacted with volatile organic compounds (VOCs) above residential drinking water and GSI criteria, however the VOC impacts to groundwater had not been fully delineated at the time of the report. Accordingly, based on assumed groundwater flow in an east northeasterly direction (based on topography and the EDR Radius Map report) it is possible for contamination associated with this site to impact the Subject Property through the migration of impacted groundwater.

Collex Collision Livonia located at 11727 Merriman Road is located approximately 0.111 miles west northwest of the Subject Property and is listed as a RCRA-CESQG and FINDS site. The RMD maintained a small file for this site. The file consisted of a letter dated September 30, 1996 to the company owner from the MDEQ verifying the site's status as a RCRA-CESQG, a letter dated April 14, 1997 to the company owner from the MDEQ about updated information for the site including that status to RCRA-SQG, and a letter dated February 8, 1995 to the new company owner verifying the site's status as RCRA-CESQG. No violations were noted in any of the documents provided from the RMD. The RD did not maintain a file for this site.

SBC – Michigan located at 11770 Merriman Road is located approximately 0.118 miles west northwest of the Subject Property and listed as a LUST, UST, AIRS, RCRA-CESQG, and FINDS site. The RD file for this site consisted of several environmental reports and letters of correspondence including documents that stated that during the course of removing two 15,000 gallons diesel USTs, Environmental Management and Engineering Services, Inc. (EMES) identified petroleum impacted soils around the top of one of the USTs and along the piping. USTs were located adjacent to the north side of the existing building. The release appeared to be the result of the operation of the USTs, and was confined to immediate area of the UST basin. A "confirmed" release was reported to the Michigan State Police – Fire Marshall Division on October 7, 1992. In early 1993, EMES oversaw the excavation of 1,571.18 tons of petroleum impacted soils from the former UST basin and was transported off-site for proper disposal. An

additional 249 tons of petroleum impacted debris was also transported off-site for proper disposal. The excavation area was backfilled with clean fill material. A total of 16 verification of soil remediation samples were collected from the UST excavation. The samples were analyzed for benzene, toluene, ethylbenzene, and xylenes (BTEX) and polynuclear aromatic hydrocarbons (PNAs). The analytical results indicated that contaminants of concern were not present in the samples at concentrations exceeding method detection limits. Accordingly, this site would not be considered a concern to the Subject Property.

M64229 – Livonia Garage located at 11780 Merriman Road is located approximately 0.121 miles west northwest of the Subject Property and listed as a UST, RCRA-CESQG, and FINDS site. The RMD file for this site consisted of a Notification of Hazardous Waste dated August 4, 1987, a letter to the company dated March 21, 1988 about changes regarding the site's status including installation changed from non-handler to generator, waste codes, and contact information, a letter dated October 29, 1986 to the maintenance supervisor stating that an inspection was conducted of the site on October 15, 1986 and the property is a RCRA-CESQG and is in compliance. A second Notification of Hazardous Waste Activity dated September 19, 1989 was also included with the documents provided by the RMD. No violations were noted on any of the documents. The RD files for this site had not yet arrived at the Southeast District MDEQ office at the time of Superior's file review. However, based on documents reviewed from the RMD and the site's status, this site would not be considered a concern to the Subject Property.

Mobil Service Station #05GE4 located at 31301 Plymouth Road is located approximately 0.04 miles southwest of the Subject Property and is listed as a UST and closed LUST site. The RD files for this site consisted of several letters of correspondence and environmental reports including a document dated December 4, 1990 regarding a confirmed release reported to the Michigan State Police – Fire Marshall Division following the removal of two USTs; one 550 gallon used oil tank and one 1,000 gallon fuel oil tank. Approximately 200 yards total of petroleum impacted soil was removed from the tank basins, and were properly disposed of off site. Groundwater was discovered during subsequent investigations at four to six feet below grade surface (BGS). Groundwater flow direction was found to be variable and ranged from southwest to southeast. A Corrective Action Plan was included in the RD file for this site dated November 26, 1991. Based on the site's status as a closed LUST site, closed on May 3, 1996, according to the EDR report, this site's former release would not be considered a concern to the Subject Property; however, given that the site has operated as a fueling station for 16 years beyond the former release, the potential exists for a separate release to have occurred that could impact the Subject Property. Accordingly, this site would be considered a concern to the Subject Property.

Based on the information obtained from the MDEQ file review, the site status, distance from the Subject Property, and/or the regional hydrogeology, none of the remaining sites identified in the EDR report would be considered evidence of a *REC*.

4.1.2 Un-mappable "Orphan" Sites

Due to poor information or inadequate address information, EDR is unable to map some sites identified in the database report. These sites may or may not be located within the

required search radii for each database. Eleven sites are listed on the EDR report. Superior reviewed the information provided by EDR for the identified "orphan" sites and deemed the sites not a concern requiring additional investigation with the exception of 31205 and 31153 Plymouth Road which is listed as a BEA site and Mobil Service Station #05GE4 located at 31301 Plymouth Road which is listed as a UST and LUST site. The MDEQ file reviews for these sites are discussed above in section 4.1.2.

4.2 Additional Environmental Records Sources

4.2.1 Local Fire Department

The City of Livonia Fire Department was contacted to determine if any information was maintained on file regarding potential *RECs*, such as USTs/ASTs and hazardous material storage or spills at the Subject Property. Superior reviewed the Subject Property's file at the City of Livonia Fire Department on August 9, 2012. The file consisted of several letters regarding the automatic fire alarm system, inspections, and grouting. One document identified the presence of sulfuric acid located on the first floor of the building, in the form of large batteries. A letter dated December 13, 1990 stated that Michigan Bell Telephone has one PCB transformer on site. An April 30, 1975 letter stated that an aboveground diesel generator had been installed and that fuel tank number 1 contained diesel fuel which is attached to the power plant. No UST installation had taken place. A December 10, 1971 application for installation of flammable liquid storage tanks was also included in the Fire Department records. These tanks were two – 2,000 gallon propane ASTs to be used for temporary heat while the building was under construction. No issues were cited in connection with the temporary ASTs. No further documentation of USTs, ASTs, spills, fires, or releases was recorded for the Subject Property address. Fire Department documentation can be found in Appendix G.

4.2.2 Local Health Department

The Wayne County Environmental Health Department was contacted in an attempt to obtain any information the department might have regarding environmental contamination incidents involving the Subject Property. Michelle Lenhart Varran, FOIA Officer with the Wayne County Environmental Health Department informed Superior on July 30, 2012 that no records are maintained for the Subject Property address. Health Department files can be found in Appendix G.

4.2.3 Local Utility Companies

Superior contacted the City of Livonia to determine the Subject Property's original connection to municipal water and sanitary sewer. Sandy (last name not given), with the City of Livonia Department of Public Works, informed Superior that her records indicated that the Subject Property was originally connected to municipal water and sewer in June of 1972 (see Appendix G).

Consumers Energy Company (Consumers) provides natural gas to the Subject Property area. According to the Consumers website (www.consumersenergy.com) the Subject Property's current service line was installed in 1989 and the main was installed in 1949 and runs along Plymouth Road (see Appendix G).

4.2.4 Previous Environmental Reports

No previous environmental reports were uncovered or provided to Superior during this Phase I ESA.

4.3 Physical Setting Sources

According to the Wayne County U.S. Department of Agriculture Soil Conservation Service general soil map, the Subject Property is located within the Belleveill-Selfridge-Tedrow loamy substratum association, which exhibits nearly level to gently sloping, very poorly, drained to somewhat poorly drained soils that have a coarse textured to moderately fine textured subsoil over a coarse textured to moderately fine textured substratum. According to the Soil Conservation Service STATSGO data, the local physiography of the area is identified as Urban Land. Specifically, soils in the area consist of silt loam, loam, and clay loam near the surface with silty clay loam, coarse sand, very fine sand, silty clay loam, and silt loam appearing in deeper soils (according to the EDR Radius Map report with GeoCheck).

Review of the EDR report and the USGS 7.5 Minute Inkster, MI Topographic Map indicated that the Subject Property is located at an elevation of approximately 640 feet above mean sea level. Based on topography, regional groundwater would likely flow to the east northeast; however, local groundwater flow may vary as a result of underground utilities, heterogeneous subsurface features, and seasonal fluctuations, among other factors.

4.4 Historical Use Information on the Property

Based on historical research, the Subject Property appears to have been developed as residences from at least 1905 (based on topographic maps) to approximately the 1970s. Subsequently, the current Subject Property building was constructed. The Subject Property has been occupied by AT&T (Michigan Bell Telephone) from the time of the current building construction in the early 1970s until 2012. The building is currently vacant of operations and is owned by CEM Wildcat LLC.

4.4.1 Local Assessor's Tax Files

Superior obtained current assessor records pertaining to the Subject Property parcel from the City of Livonia (see Appendix C). Information included on the documentation consists of the following information:

- Parcel Number – 103-99-0021-000;
- Subject Property owner – CEM Wildcat LLC;
- Former owners – HG Properties LP, Real Properties MLP, and Wild Cat LTD;
- Legal description;
- Building sketch;
- Building size – approx. 36,336 square feet;
- Year built – 1971;

Superior obtained additional current assessor records for the Subject Property parcel from the City of Livonia Tax and Property Information website. The assessor records do not reveal any environmental liens or RECs on the Subject Property.

4.4.2 Fire Insurance Maps

Sanborn® Fire Insurance Maps (Sanborn® Maps) were initially produced for the insurance industry to provide information on the fire risks of buildings and other structures. The information contained on the maps has become a valuable historical resource, because particular attention was paid to building construction materials and the presence of above and underground storage tanks that may have stored flammable materials. Superior requested EDR to search for and procure Sanborn® Maps; however they are not available for the Subject Property area. A copy of the Sanborn® Map report verifying that no coverage exists can be found in Appendix G.

4.4.3 Aerial Photographs

Aerial photographs were obtained for the vicinity of the Subject Property from EDR. Aerial photographs were available from 1937, 1940, 1949, 1957, 1961, 1967, 1972, 1985, 1993, 1999/2000, 2000, and 2005 (see Appendix H). Observations made from the aerial photographs were limited by scale and resolution.

1937, 1940, 1949, 1957, 1961, & 1967

The Subject Property consists of at least two residences on the 1937, 1940, 1949, 1957, 1961, and 1967 aerial photographs. Agricultural land adjoins the Subject Property to the north on the 1937, 1940, 1949, and 1957 aerial photographs. Residences adjoin the Subject Property to the east, south, and west on the aerial photographs from 1937 to 1967. A small orchard is visible on the southeast adjoining property south of Plymouth Road on the 1940, 1949, 1957, 1961, and 1967 aerial photographs. Agricultural and vacant land is visible further to the northeast and northwest with residential areas visible to the southeast, south, and southwest. Some commercial and light industrial operations are visible further north of the Subject Property.

1972, 1985, 1993, 1999/2000, 2000, & 2005

The current Subject Property building is present on the aerial photographs from 1972 to 2005. Commercial and Industrial properties adjoin the Subject Property to the north, east, south, and west. The Subject Property is located within a developing commercial and industrial area with residential areas visible to the south beyond Plymouth Road. The Subject Property and adjoining properties appear consistent with what was observed at the time of the site reconnaissance on the 2005 aerial photograph.

4.4.4 Historical City Directories

Historical city directories (Bresser's Criss-Cross Directory), which list tenants by address, were researched by EDR for the Subject Property area. The directories were reviewed at various intervals between 1973 and 2012. City directories for the Subject Property address were available between 1973 and 2012. The Subject Property address (31100 Plymouth Road) is first listed in 1973 as Burke D Campbell, D E Burwell, Mich Bell Telphne, and Richard H Weth. In 1977, the Subject Property is listed as Burke D Campbell, C S Crimp, Donald A Dubois, Gary R Lytle, Kenneth B Lange, and S T Economy. In 1982, the Subject Property is listed as Don L Vangilder, Donald A Dubois, John T Fields Jr, and Richard H Weth. In 1987, the Subject Property is listed as Evon B Murphy. In 1992, the Subject Property is listed as Marcia Buhl. In 1997 and 2002, the Subject Property is listed as Sayles Marcia M. In 2007, the Subject Property is listed as

Mbt Co and Sayles Marcia M. In 2012, the Subject Property is listed as AT&T and Sayles Marcia M. A copy of the EDR City Directory Abstract is located in Appendix I.

Surrounding addresses were also researched by EDR. Surrounding addresses are listed below.

30905 Plymouth Road – Wonderland Mobil Hm (1973), Manufacturers Bank (1987, 1992), Disabled American Veterans (2002, 2007, 2012)

31117 Plymouth Road – Elks Lodge (1973, 1977, 1982, 1987, 1992, 1997, 2002, 2007), Elks BPO (2012)

31122 Plymouth Road – Livonia Dem Club (1973)

31129 Plymouth Road – MLS Express Real Estate (2007), Professional Construction And Consul (2012)

31147 Plymouth Road – Downriver Refrgrtn (1982, 1987, 1992), H & H Wheel Serv Detroit Inc. (1997, 2002, 2007, 2012)

4.4.5 Historical Topographic Maps

Historical topographic maps were provided by EDR for the Subject Property area for the years 1905, 1936, 1952, 1968, 1973, 1983, and 1996 (see Appendix J).

The Subject Property appears to be located within a rural area in the City of Livonia on the 1905 topographic map. A small structure appears to be depicted in the area of the Subject Property or neighboring property. Similar, small structures are scattered along Plymouth Road. The Shaw Drain is visible to the north along with the Pere Marquette railroad. The Middle River Rouge is located to the south.

The 1936 topographic map appears to depict two small structures located either on the Subject Property or adjoining properties. A residential neighborhood is depicted to the southwest of the Subject Property. The National Air Service Airport is located to the southeast of the Subject Property along with a large wooded area. Some small structures are depicted further east, southeast, and west of the Subject Property. What appears to be residential development has progressed south of the Middle River Rouge which is described as Garden City.

The 1952 topographic map depicts a small structure on the Subject Property with structures also located on the eastern and western adjoining properties. A small orchard appears to be visible to the southeast of the Subject Property with small structures located immediately adjoining the Subject Property beyond Plymouth Road to the south. The city of Rosedale Gardens is depicted to the southwest of the Subject Property beyond Merriman Road.

The 1968 topographic map no longer depicts small structures on the Subject Property. A small road connecting Merriman Road to Plymouth Road adjoins the Subject Property to the north and east. Some commercial buildings are depicted to the north and east of

the Subject Property with smaller structures located to the west and south. A small orchard is still depicted to the southeast of the Subject Property. Commercial development continues to progress further east and west of the Subject Property along Plymouth Road.

The 1973 topographic map depicts the current Subject Property building located on the Subject Property with commercial buildings located to the north, east, and west of the Subject Property. Small structures are depicted to the south of the Subject Property with a small orchard visible to the southeast of the Subject Property.

The 1983 and 1996 topographic maps depict the Subject Property and immediately adjoining properties similar to what was observed on the previous topographic map. Commercial and industrial development continues to progress to the north, east, and west along Plymouth Road.

5.0 SITE RECONNAISSANCE

On August 8, 2012, Mr. Karl Primdahl and Ms. Holly Fink visited the Subject Property for the purpose of making observations relative to the possible presence of *RECs* at the Subject Property and vicinity. Mr. Primdahl and Ms. Fink were provided access into the Subject Property building by Steve, the building manager. A Subject Property Location Map is provided as Figure 1 and a Site Plan is provided as Figure 2. Color photographs are provided in Appendix B and a Site Reconnaissance Checklist is provided in Appendix K.

At the time of the site reconnaissance, the weather was approximately 70 degrees Fahrenheit and rainy. Mr. Primdahl and Ms. Fink viewed representative portions of the interior of the buildings, the exterior, and the adjacent properties from the perimeter of the Subject Property.

5.1 General Discussion of Interior Observations

The building consists of one approximately 36,336 square foot, three story, commercial building. The upper floors contain mainly office spaces, restrooms, and break areas. The lower level contains three boilers for heating. Steve stated that the building used natural gas for heating purposes. A refrigeration vent line vents to the outside of the building. A battery storage area was observed within this area of the building; however there appeared to be no signs of leaks or spills. The flooring throughout the building appeared to be in excellent condition with minimal staining. Several pad-mounted transformers were observed throughout the building. All of these transformers appeared to be in good condition with no evidence of leaking or staining. The building utilizes one hydraulic lift for an elevator, which appeared to be in good condition.

5.2 General Discussion of Exterior Observations

The Subject Property exterior consists of asphalt paved parking areas to the north, east, and west of the Subject Property building; landscaped and grassy areas immediately adjoining the building to the north, south, and west; and concrete sidewalks are present to the east, south, and partially to the west. A loading dock is located to the northeast of the building with a municipal storm sewer drain located at the bottom of the ramp. A large air conditioning unit is present on the north side of the building immediately to the west of the loading dock. A vent pipe was observed on the north side of the building and

was later identified as a vent pipe for the refrigeration vent system located within the building. A concrete slab with copper wiring was observed on the north side of the building. Steve explained that this slab was going to be used for a new transformer that would be installed when the current pad-mounted transformer was removed. A large pad-mounted PCB containing transformer was observed near the north side of the building. This transformer appeared to be in good condition with no evidence of leaks or staining. In addition, the surrounding vegetation appeared to be healthy with no indication of leaks or spills from the unit. A large generator was observed near the northwest corner of the building. This generator was also connected to an aboveground diesel fuel storage tank. The tank appeared to be relatively new and in excellent condition with no evidence of leaks or spills.

5.3 Site Inspection Observations

5.3.1 Utilities

Several floor drains were observed throughout the building. It was reported that these floor drains are connected to the municipal sewer system. No wells or septic systems were observed on the Subject Property, which has been connected to both municipal water and sewer since June of 1972.

No visual evidence of sumps or other wastewater systems were noted during this ESA. No surficial evidence of additional subgrade utilities, wells, or dry wells was present on-site.

5.3.2 Suspect Polychlorinated Biphenyl (PCB) Containing Equipment

The Subject Property and immediate vicinity were viewed for the presence of PCB containing equipment, such as electrical transformers, capacitors, and hydraulic equipment. PCBs were historically used as the di-electric fluid in transformers, capacitors, and ballasts because of their non-flammability, chemical stability, high boiling point, and electrical insulating properties.

Transformers

Several pad-mounted transformers were observed throughout the interior of the building. None of these transformers appeared to have any evidence of leaks or staining on the surrounding flooring. All transformers within the building appeared to be in good condition.

One large pad-mounted transformer was observed outside to the north of the building. This transformer was labeled as "Contains PCBs." However, no staining or evidence of leaks was observed by Superior personnel at the time of the site reconnaissance. In addition, the surrounding vegetation appeared to be healthy.

Other Potential PCB-Containing Equipment

Superior did not observe any other equipment suspected of containing PCBs on the Subject Property.

5.3.3 Underground Storage Tanks (USTs)

The Subject Property was visually inspected for the presence of USTs. No visual evidence indicating the current presence of USTs (such as vent pipes or fill ports) was noted at the time of inspection. Furthermore, the Subject Property owner has no knowledge of any current or historical USTs.

None of the neighboring properties have any visual evidence of fill ports, pump islands, or vent pipes that would indicate the existence of USTs when observed from the Subject Property or points of public access.

5.3.4 Aboveground Storage Tanks (ASTs)

The Subject Property was visually inspected for the presence of ASTs. One diesel fuel AST, which appeared to be in excellent condition with no signs of leaks or spills is located on the Subject Property.

None of the neighboring properties have any visual evidence that would indicate the presence of ASTs when observed from the Subject Property or points of public access.

5.3.5 Other Chemical Storage/Potentially Hazardous Materials

No additional chemicals are currently stored on the Subject Property premises.

5.3.6 Other Conditions of Potential Concern

The Subject Property was also observed for construction and demolition debris, dry wells, pits, ponds or lagoons, odors, stressed vegetation, and abandoned containers. None of the above was observed on the Subject Property.

6.0 INTERVIEWS

6.1 Property Owner/Operator/Manager

Mr. Michael Oliver, Subject Property owner representative, completed an Owner/Operator Environmental Questionnaire (see Appendix D). Mr. Oliver stated in the questionnaire that he was not aware of any existing environmental conditions on the Subject Property. He stated that the Subject Property is connected to municipal sanitary and storm sewer and natural gas. Mr. Oliver also stated that one diesel fuel AST was present on the Subject Property. He stated that an AST was removed from the site in 2007. Mr. Oliver stated that the pad-mounted transformer on the exterior of the Subject Property may contain PCBs.

6.2 Occupants

No occupants were available for interview.

6.3 Government Officials

Superior interviewed personnel with the City of Livonia, the City of Livonia Fire Department, and the Wayne County Environmental Health Department. These interviews are summarized above.

7.0 FINDINGS

While conducting this Phase I ESA, Superior noted the following known or suspect environmental conditions associated with the Subject Property:

1. The presence of a PCB containing pad-mounted transformer on the exterior of the Subject Property.
2. The presence of a diesel AST located on the Subject Property.
3. The presence of a vent pipe on the outside of the building.
4. The potential for groundwater contamination associated with the southwest neighboring property to migrate onto the Subject Property.
5. The potential for a release to have occurred at the southwest neighboring Mobile service station and for such a potential release to impact the Subject Property.
6. The presence of RCRIS/Generator, FINDS, SHWS, LUST, AST, BEA and Drycleaner sites located within the applicable ASTM radius.

8.0 OPINIONS

It is Superior's professional opinion that condition four, listed in Section 7.0 above, constitutes an actual REC to the Subject Property and conditions one, two, and three do not constitute actual RECs to the Subject Property.

Superior observed one pad-mounted transformer located on the exterior of the Subject Property that was labeled as "contains PCBs." However, no evidence of staining, spills, or leaks were observed around the base of the transformer. In addition, no issues with the transformer were reported by the Subject Property owner representative or the City of Livonia Fire Department. Accordingly, condition one is not evidence of a REC

Superior observed one diesel AST located on the Subject Property. This AST appeared to be in excellent condition with no evidence of spills or leaks. In addition, no MDEQ records were maintained regarding issues or concerns associated with the AST. Accordingly, condition two is not evidence of a REC.

Superior observed a vent pipe located on the outside of the Subject Property building. After speaking with the building manager, the vent pipe was identified as being associated with the refrigerant cooling system. This pipe was not associated with any USTs. Accordingly, condition three is not evidence of a REC.

The MDEQ RD file maintained for the southwest neighboring One Hour Martinizing site at 31155 Plymouth Road consisted of a BEA report that stated analytical results completed in July 2006 showed that impacted soil was identified that exceeded GRCC at various sample locations. Impacted groundwater was also identified above GRCC at various locations on the site. Groundwater was identified to be impacted with VOCs above residential drinking water and groundwater/surface water interface criteria; however, the VOC impacts to groundwater had not been fully delineated at the time of the report. Based on the likely groundwater flow to the east northeast (based on the EDR Radius Map report) it is possible for contamination associated with this site to impact the Subject Property through the migration of impacted

groundwater. Accordingly, condition four would be considered evidence of a REC to the Subject Property.

The MDEQ RD file maintained for the southwest neighboring Mobile Service Station at 31301 Plymouth Road consisted of several documents verifying that the site is a closed LUST site and has been closed since May 3, 1996. However, because the site has continuously operated as a fueling station since the past release, the potential exists for a second release to have occurred at the site within the last 16 years. Given the likely groundwater flow, towards the Subject Property, the potential exists for any possible release to migrate towards the Subject Property. Accordingly, condition five would be considered evidence of a REC to the Subject Property.

Due to information obtained from the MDEQ review, the status, the distance from the Subject Property, the regional hydrogeology, suspect groundwater flow direction and soil type none of the remaining RCRIS/Generator, FINDS, SHWS, LUST, AST, BEA and Drycleaner sites would be considered evidence of a REC.

9.0 CONCLUSIONS

Superior has performed a Phase I ESA in conformance with the scope and limitations of the ASTM Practice E 1527-05. Any exception to or deletions from this practice are described in Sections 1.5 and 10.0 of this report. The ESA has revealed no evidence of RECs in connection with the Subject Property with the exception of the following:

- The potential for groundwater contamination associated with the southwest neighboring property to migrate onto the Subject Property.

It is Superior's professional opinion that this Phase I ESA was conducted in a manner that is consistent with "all appropriate inquiry" in connection with the innocent landowner provision in Section 20126(3)(h) of Part 201's PA 451 of 1994, as amended, and Section 107(b)(3) of the Comprehensive Environmental Response, Compensation and Liability Act, 42 U.S.C.A. § 9601 (CERCLA), as amended.

10.0 RECOMMENDATIONS

Superior recommends the completion of a Phase II ESA to address the RECs identified above.

11.0 DEVIATIONS

Superior did not deviate from the standard practice ASTM E1527-05.

12.0 NON-SCOPE CONSIDERATIONS

No non-scope considerations were addressed as part of this Phase I ESA.

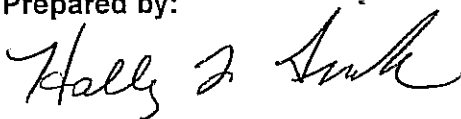
13.0 REFERENCES

- **Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process**; ASTM; 2005.
- **All Appropriate Inquiry Standard**. 40 CFR Part 312; November 1, 2005.

- **Section 20126(3)(h) of Part 201's PA 451 of 1994**, as amended and Section 107(b)(3) of the Comprehensive Environmental Response, Compensation and Liability Act, 42 U.S.C.A. § 9601 (CERCLA), as amended.
- **Aerial Photographs**; Environmental Data Resources, Inc.; 1937, 1940, 1949, 1958, 1961, 1967, 1972, 1985, 1993, 1999/2000, 2000, and 2005.
- **The EDR Radius Map**; Environmental Data Resources, Inc.; July 24, 2012.
- **The EDR City Directory Abstract**; July 21, 2012.
- **EDR Historical Topographic Map Report**; Environmental Data Resources, Inc.; 1905, 1936, 1952, 1968, 1973, 1983, and 1996.
- **Sanborn® Map Report**; Environmental Data Resources, Inc.; July 24, 2012.
- **"Inkster, Michigan." 7.5 Minute Topographic Quadrangle Map**; United States Geological Survey.
- **Wayne County United States Department of Agriculture Soil Conservation Service General Soil Map**.
- **Contacts and Interview**
 - **Pat Johnson**, Wayne County Environmental Health Department FOIA Control Coordinator, (734) 727-7413
 - **Sandy**, Livonia Department of Public Works Water Billing, (734) 466-2278
 - **Consumers Energy Company**, www.consumersenergy.com
 - **Mike Allred**, User Representative, (469) 229-7032

14.0 SIGNATURES OF ENVIRONMENTAL PROFESSIONALS

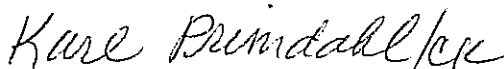
Prepared by:



Holly Fink
Field Scientist

I declare that, to the best of my professional knowledge and belief, I meet the definition of Environmental Professional as defined in §312.10 of 40 CFR 312 and I have the specific qualifications based on education, training, and experience to assess a property of the nature, history, and setting of the Subject Property. I have developed and performed the all appropriate inquiries in conformance with the standards and practices set forth in 40 CFR Part 312.

Overseen and Reviewed by:



Karl Primdahl
Account Manager / Senior Account Manager
Environmental Professional