

**STS CONSULTANTS**

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November 20, 2006

Mr. Derek Delacourt  
Deputy Director, Planning Department  
City of Rochester Hills  
1000 Rochester Hills Drive  
Rochester Hills, MI 48309

Re: Air Monitoring at Adams Hamlin Development

Dear Mr. Delacourt:

Based on our meeting today with Tervor Woolat and Neil Silver, representing Adams/Hamlin Properties, LLC and separate meetings with Mayor Barnett, Council President Rosen, and City Attorney John Staran, it is prudent to record the basis from which an air monitoring program will be developed by AKT Peerless for the initial investigation, which is the subject of the initial MI Act 381 Workplan. This is, of course, subject to future MDEQ scrutiny but will be presented in the applicant's revised MI Act 381 Workplan, to be contemplated by the City Council. As the issue stands now, the Applicant will proceed along the following technical path, subject to Council and MDEQ approval:

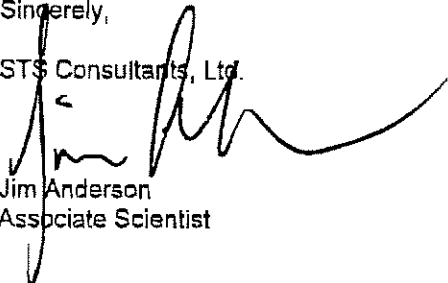
- Collect a baseline of air quality samples at 6 locations around the perimeter of the Adams/Hamlin site. The duration of the sample pump collection time (through a summa canister) will be coordinated with City Staff and their designee prior to implementation. The analytical parameters should be based upon a review of previously detected contaminants at the site but at a minimum should include; volatiles, semi-volatiles, metals, and PCBs. Other scans, additional scans ie. organochlorine pesticides/phenols, or combinations thereof will be reviewed by the City Staff or their designee at the applicant's request. The collection of the baseline air samples should commence two to three days prior to the initial phase of investigative drilling, geoprobe investigation or test pitting. Standard laboratory turn-around-time is acceptable unless unforeseen circumstances dictate otherwise.
- The existing MI Act 381 Workplan has and will continue to contemplate active monitoring of the immediate work-site by the Applicant's consultant. This immediate area monitoring will be completed for all field activity and investigative work, at each investigative location, whether drilling, using a geoprobe, or test-pitting. This active monitoring, though qualitative in nature, provides real-time indications of excessive concentrations of contaminants that could endanger the site worker and nearby residents. The command and control plan for instances of excessive concentrations, if any are found, will be coordinated by AKT Peerless, with City Staff and their designee prior to the investigative phase.
- The Applicant will evaluate the baseline data collected for the site with the qualitative readings developed in the immediate area monitoring and compare that information with the results of the soil and groundwater investigation. The Applicant will then revise, as necessary (in future Act 381 plans), the plan for active air monitoring (and analytical parameters and particulates, as necessary, based on the history and data gathered above) to be conducted during the course of the active remediation, which is likely the activity with the greatest inherent risk of exposing the public or the environment. The methods by which remediation air quality monitoring will be conducted have not been

fully identified and are dependent on and may be revised by the data gathered in the initial air monitoring process. If necessary, based on a variety of variables (ie. Weather, wind, temperature, potential off-site sources, etc.), the applicant will conduct a second set of baseline samples from similar locations as described above, prior to implementing remedial activity. Additional command and control systems will be needed for exceedances of action levels and will be presented to the City Staff and their designee prior to remedial activities.

If you have questions about this summary please contact me at 248-676-9594 or 313-727-7216.

Sincerely,

STS Consultants, Ltd.



Jim Anderson  
Associate Scientist