

TABLE 3

December 30, 2009

Page 1 of 2

**CORRECTIVE MEASURES SUMMARY
DETROIT DIESEL CORPORATION SITE
REDFORD TOWNSHIP/DETROIT, MICHIGAN**

AREA	MEDIA REQUIRING CORRECTIVE MEASURES	PROPOSED CORRECTIVE MEASURES	REMEDIATION/MONITORING END POINT	CONFIRMATION OF END POINT
Entire Site	Impacted groundwater above MDEQ drinking water criteria	Institutional controls to prevent all uses of groundwater	No Groundwater Use (restrictive covenant filed with Wayne County Register of Deeds)	Implementation of institutional controls to prevent use of groundwater (Recorded copy of restrictive covenant received by U.S. EPA)
Entire Site	Impacted soil above MDEQ generic criteria	Institutional controls to prevent unacceptable use of the Site (Restricted to Commercial/Industrial Land Uses)	No unacceptable use of Site (restrictive covenant filed with Wayne County Register of Deeds)	Implementation of institutional controls to prevent unacceptable use of Site (Recorded copy of restrictive covenant received by U.S. EPA)
AOI 25 on-site	On-site VOC impacted groundwater plume stability	Groundwater Monitoring Plan to confirm dissolved concentrations remain below applicable risk-based criteria ⁽¹⁾	Concentrations stable and/or decreasing and less than applicable risk-based criteria ⁽¹⁾	Semi-annual monitoring of groundwater at monitoring wells identified in the Groundwater Monitoring Plan which demonstrate stable or decreasing concentrations of select VOCs based on data from 2 consecutive years or as agreed upon with the U.S. EPA
	On-site VOC impacted groundwater exceeding generic groundwater contact criteria	Institutional controls to prevent unacceptable exposures to groundwater	Due Care Plan and update memorandum	Implemented Due Care Plan Due Care Plan can be eliminated for AOI 25 when concentrations are below applicable risk-based criteria ⁽¹⁾ for 2 consecutive years
AOI 25 off-site	Off-site impacted groundwater plume stability	Groundwater Monitoring Plan to confirm dissolved concentrations remain below applicable risk-based criteria ⁽¹⁾	Concentrations stable and/or decreasing and less than applicable risk-based criteria ⁽¹⁾ and upgradient concentrations will not cause unacceptable off-site exposures	Semi-annual monitoring of groundwater at wells identified in the Groundwater Monitoring Plan which demonstrate stable or decreasing concentrations of select VOCs based on data from 2 consecutive years or as agreed upon with the U.S. EPA

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LNAPL AOIs	LNAPL - Plume Stability	Groundwater Monitoring Plan to determine LNAPL extents and thicknesses are stable	LNAPL extents and thicknesses are stable	Groundwater elevation/product thickness measurements at monitoring wells identified in the Groundwater Monitoring Plan show a stable or decreasing product thickness for 2 consecutive years
	LNAPL - Recovery	Continued use of existing LNAPL recovery systems	LNAPL in vicinity of recovery well(s) is no longer recoverable	LNAPL measurements are less than 0.1 feet in the recovery well for 2 consecutive years
	LNAPL - Exceeding acceptable risk estimates at AOI 11	Institutional controls to prevent unacceptable exposures to LNAPL	Due Care Plan and update memorandum	Implemented Due Care Plan Due Care Plan can be eliminated for AOI 11 when concentrations are below applicable risk-based criteria ⁽¹⁾ for 2 consecutive years, updated risk estimates show no potential unacceptable risks, or LNAPL is no longer present in AOI 11 monitoring/recovery wells

Notes:

(1) Applicable risk-based criteria presented in Table 2

LNAPL - Light Non-aqueous Phase Liquid

AOI - Area of Interest

bgs - below ground surface

Select VOCs include: 1,1,1-Trichloroethane, 1,1-Dichloroethene, cis-1,2-Dichloroethene, Tetrachloroethene, trans-1,2-dichloroethene, Trichloroethene, Vinyl Chloride