



**CONESTOGA-ROVERS
& ASSOCIATES**

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March 10, 2006

Reference No. 13151-10

Mr. Mazin Enwiya
United States Environmental Protection Agency
Region 5
77 West Jackson Boulevard (SR-6J)
Chicago, IL 60604-3507

Dear Mr. Enwiya:

Re: Monthly Progress Report No. 40
Remedial Design/Remedial Action UAO
Former Rockwell International Corporation Site
Allegan, Michigan

On behalf of ArvinMeritor, Inc. (ArvinMeritor), and in accordance with Section XI, Paragraph 67 of the Unilateral Administrative Order (UAO) for the Former Rockwell International Site (Site) effective October 30, 2002, Conestoga-Rovers & Associates (CRA) has prepared the following progress report for the period of February 1, 2006 through February 28, 2006. Pursuant to Section XI, Paragraph 67 of the Administrative Order, this report is due at the United States Environmental Protection Agency (U.S. EPA) on March 10, 2006.

1. Activities Taken to Comply with the Administrative Order

During this reporting period, the following activities were undertaken:

- On February 10, 2006, Monthly Progress Report No. 39 was submitted to the U.S. EPA covering the period of January 1, through January 31, 2006;
- Ongoing discussions between CRA and Waste Management (WM) have occurred throughout the reporting period regarding the required approval for the disposal of soils to be generated from the remaining excavation areas to be completed in 2006;
- Coordination of drilling subcontractor services to facilitate subsurface soil sample collection for waste characterization laboratory analyses as per the request of WM; and
- Weekly Site inspections were conducted on February 1, 9, 15, and 22, 2006.



2. **Sampling, Tests and All Other Data Received During the Reporting Period**

Due to precipitation and snow melt, surface water has accumulated within the former Waste Water Treatment Plant (WWTP) pond area. In order to determine if the surface water is suitable for direct discharge to the City of Allegan sewer system or if the surface water requires treatment through the on-Site treatment system, the following sample was collected by CRA on March 1, 2006 as part of the RA:

<i>Sample ID</i>	<i>Sample Location</i>	<i>Laboratory Analysis</i>
W-37326-030106-NK-057	Former WWTP Ponds	Discharge Parameters

The sample was submitted under chain-of-custody protocol to KAR Laboratories for analyses as per the parameters listed in the City of Allegan Wastewater Discharge Permit. The results are pending and will be discussed in the progress report for the reporting period of March 1, 2006 through March 31, 2006.

3. **Actions Planned for the Next 90-Days**

The following activities are anticipated for the next 90 days:

- Collection and submittal of subsurface soil samples for waste characterization laboratory analyses;
- Continued discussion with WM regarding approval for disposal of soils generated from the remaining excavation areas to be completed in 2006;
- Weekly Site inspections; and
- Mobilization of heavy equipment to the Site in preparation for spring excavation activities.

4. **Difficulties Encountered**

Although access was granted by the City of Allegan to implement the RA, restrictive covenant agreements with the City continue to remain unresolved. Conference calls with counsel for the City of Allegan and U.S. EPA Assistant Regional Counsel, Kathleen Schnieders, resulted in the conclusion that the restrictive covenant requirement would be deferred at this time.



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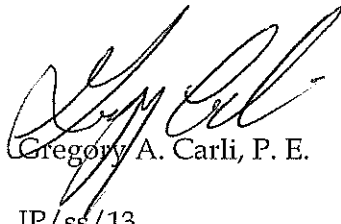
5. Actions Taken to Resolve Difficulties Encountered

No actions were taken during this reporting period.

We trust this progress report provides you with the information required to assess the status of this project. Should you have any questions on the above, please do not hesitate to contact us.

Yours truly,

CONESTOGA-ROVERS & ASSOCIATES



Gregory A. Carli, P. E.

JP/ss/13

c.c.: Kathleen Schnieders (U.S. EPA)
Matt Williams (MDEQ)
Omprakash Patel (Weston)
James Enright (Law Weathers & Richardson)
Linda Furlough (ArvinMeritor)
William Schikora (Dykema Gossett)
Jerome Maynard (Dykema Gossett)