



**CONESTOGA-ROVERS  
& ASSOCIATES**

261 Martindale Road, Unit #3, St. Catharines, Ontario L2W 1A2  
Telephone: 905-682-0510 Facsimile: 905-682-8818  
www.CRAworld.com

August 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. 45  
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 July 1, 2006 through July 31, 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 August 10, 2006.

1. **Activities Taken to Comply with the Administrative Order**

During this reporting period, the following activities were undertaken:

- On July 10, 2006, Monthly Progress Report No. 44 was submitted to the U.S. EPA covering the period of June 1, 2006 through June 30, 2006;
- Excavation of contaminated soil and LNAPL impacted areas continued throughout the reporting period;
- Soil chemical and LNAPL verification samples were collected from completed Excavation Area No. 5 (LNAPL) throughout the reporting period;
- On July 27, 2006, an investigation was conducted to determine whether there was any contamination resulting from cracks observed within the underground sewer line; and
- Treatment of wastewater through the on-Site wastewater treatment system continued throughout the reporting period.



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

On July 10, 2006, as part of the excavation of Area No. 5 (TSCA LNAPL), CRA collected seven soil chemical verification samples from the floor and walls for polychlorinated biphenyls (PCB) laboratory analyses in addition to the LNAPL verification samples. All samples were submitted under chain-of-custody protocol to Severn Trent Laboratories Inc. (STL) for laboratory analyses. A summary of the preliminary unvalidated soil sample analytical results is provided in Table 1. An exceedance of the applicable Soil Cleanup Criteria for >2 feet bgs was noted in sample KK-353 which was collected from the north wall of the excavation. On July 13, 2006, further excavation was conducted in the vicinity of the sample KK-353 and an additional soil chemical verification sample, KK-360, was collected and submitted for PCB analyses. As the analytical results indicate the PCB concentrations for sample KK-360 were below Soil Cleanup Criteria for >2 feet below ground surface (bgs) no further excavation or sample collection was required. A summary of the preliminary unvalidated soil sample analytical results is provided in Table 1.

It should be noted that while excavating Area No. 5 (non-TSCA LNAPL), crushed drum carcasses were noted. All the drum carcasses were removed as part of the excavation process and stockpiled separately. A composite sample (KK-361) of the stockpiled material was collected for disposal requirements and submitted for laboratory analyses of PCBs, Toxicity Characteristic Leaching Procedure (TCLP) volatile organic compounds (VOC), TCLP semi-volatile organic compounds (SVOC), and metals. The soil sample indicated that the analyzed parameters were not detected above the laboratory detection limit thereby confirming that the soils are non-hazardous. A summary of the preliminary unvalidated soil sample analytical results is provided in Table 2.

As noted in Monthly Progress Report No. 43, polychlorinated dibenzo-p-dioxins/ polychlorinated dibenzofurans (PCDD/PCDF) exceedances of the Soil Cleanup Criteria were noted in samples KK-272, KK-276, KK-277, KK-278, and KK-279 as part of the excavation for Area No. 5 (2 to 10 bgs). As samples KK-272, KK-276, KK-277, KK-278, and KK-279 were collected from the floor of the excavation that overlapped the underlying LNAPL portion of Area No. 5, further excavation and sampling related to these samples would be included as part of the LNAPL excavation. Between June 29, 2006 and July 5, 2006, as the excavation of Area No. 5 was completed, five soil chemical verification samples (KK-348 to KK-352) were collected for PCDD/PCDF analyses. No further exceedances of the Soil Cleanup Criteria were noted from the additional sampling. A summary of the preliminary unvalidated soil sample analytical results is provided in Table 3.



In addition to the soil chemical verification samples collected, 39 LNAPL soil verification samples were collected from Excavation Area No. 5. A summary of LNAPL soil verification samples is provided in Table 4 along with an indication of whether the sample passed the LNAPL soil test. As shown in Table 4, no samples failed to meet the LNAPL soil test requirements.

As noted in the memo of July 6, 2006 documenting the sewer cleaning and video taping activities, CRA planned to abandon in place all the sewers investigated with the exception of the sewer line extending east from MH11. CRA planned to excavate portions of the sewer extending east from MH11 in the vicinity of the cracks and pipe sag noted during the video inspection in order to further investigate the presence or absence of impact to the surrounding soil. On July 27, 2006, the two sections of the sewer line extending east from MH11, as noted in the July 6<sup>th</sup> memo, were excavated. No staining or evidence of contamination was noted. The excavated material was stockpiled separately and a composite sample (KK-363) was collected and submitted for TCLP metals analyses. The soil sample collected indicated that the analyzed parameters were either not detected above the laboratory detection limit or were below the appropriate criteria, thereby confirming that the soils are non-hazardous. A summary of the preliminary unvalidated soil sample analytical results is provided in Table 2.

In July 2006, nine wastewater samples were collected from the on-Site water treatment system to determine compliance with the City of Allegan wastewater discharge permit requirements. A summary of wastewater samples is provided in Table 5 along with an indication of whether the sample met the discharge permit requirements. As shown in Table 5, no samples failed to meet the discharge permit requirements.

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

The following activities are anticipated for the next 90 days:

- Continued discussion with WM regarding approval for disposal of soils from the excavation areas completed in 2006;
- Continue Site balancing, final grading, and Site restoration activities;
- Demobilization from the Site;
- Preparation of Operation, Maintenance, and Monitoring Report;
- Preparation of Final Construction Report;
- Attendance at re-scheduled Pre-Certification Inspection Meeting; and
- Attendance at Final Pre-Certification Inspection Meeting.



**CONESTOGA-ROVERS  
& ASSOCIATES**

August 10, 2006

4

Reference No. 13151-10

4. On-Going Considerations Related to the Administrative Order

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.

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

A handwritten signature in black ink, appearing to read 'Greg Carli', is written over the typed name.

Gregory A. Carli, P. E.

JP/jp/20

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



TABLE 1

SUMMARY OF EXCAVATION SOIL SAMPLING ANALYTICAL RESULTS - PCBs  
 FORMER ROCKWELL INTERNATIONAL CORPORATION  
 ALLEGAN, MICHIGAN

Sample ID:	Date Sampled:	Sample Location:	Sample Depth (feet bgs)	Soil Cleanup Criteria		Selected Parameters	Results
				0 - 2 feet bgs <sup>(1)</sup>	> 2 feet bgs <sup>(2)</sup>		
S-13151-071006-KK-358	7/10/06	Excavation Area 5-Floor 3	19	1,000	10,000	ug/kg	ND(340)
S-13151-071006-KK-359	7/10/06	Excavation Area 5-Wall 4	18	1,000	10,000	ug/kg	ND(390)
S-13151-071306-KK-360	7/13/2006	Excavation Area 5-Wall 1	18	1,000	10,000	ug/kg	ND(6900)
S-13151-072106-KK-362	7/21/2006	Excavation Area 5		1,000	10,000	ug/kg	ND(450)
		Additional Excavation		1,000	10,000	ug/kg	ND(450)
				1,000	10,000	ug/kg	ND(450)
				1,000	10,000	ug/kg	ND(450)
				1,000	10,000	ug/kg	ND(450)
				1,000	10,000	ug/kg	8600
				1,000	10,000	ug/kg	ND(6900)
				1,000	10,000	ug/kg	ND(390)
				1,000	10,000	ug/kg	ND(390)
				1,000	10,000	ug/kg	ND(340)
				1,000	10,000	ug/kg	ND(340)
				1,000	10,000	ug/kg	ND(340)
				1,000	10,000	ug/kg	ND(340)
				1,000	10,000	ug/kg	28J
				1,000	10,000	ug/kg	ND(340)

TABLE 1

SUMMARY OF EXCAVATION SOIL SAMPLING ANALYTICAL RESULTS - PCBs  
 FORMER ROCKWELL INTERNATIONAL CORPORATION  
 ALLEGAN, MICHIGAN

Notes:

- (1) - Michigan Act 451, Part 201, Rule 746, Table 2. Soil: Residential and Commercial I, Part 201 Generic Cleanup Criteria and Screening Levels, Direct Contact Criteria.
- (2) - Michigan Act 451, Part 201, Rule 748, Table 3. Soil: Industrial and Commercial II, III, and IV, Part 201 Generic Cleanup Criteria and Screening Levels, Industrial and Commercial II Direct Contact Criteria.

- bgs - below ground surface.
- mg/kg - micrograms per gram.
- mg/kg - milligrams per kilogram.
- pg/g - picograms per gram.
- ug/kg - micrograms per kilogram
- J - Method blank contamination.

The association method blank contains the target analyte at a reportable level.

- B - Estimated result. Result is less than the Reporting Limit.
- E - Matrix Interference.

ND() - Parameter non-detect at reporting limit within parenthesis

- 1.00 - Parameter exceeds Soil Cleanup Criteria for 0-2 feet bgs as defined in (1)
- 1.00 - Parameter exceeds Soil Cleanup Criteria for >2 feet bgs as defined in (2)

G - Elevated reporting limit. The reporting limit is elevated due to matrix interference.

CON - Confirmation analysis

**SUMMARY OF WASTE CHARACTERIZATION ANALYTICAL RESULTS  
FORMER ROCKWELL INTERNATIONAL CORPORATION  
ALLEGAN, MICHIGAN**

Parameter	Units	TSCA Criteria	TCLP Criteria	Sample ID:	S-13151-072106-KK-361	S-13151-072706-KK-363
				Date Sampled:	7/21/2006	7/27/2006
				Sample Location:	Excavation 5 Drum Stockpile	Sewer Excavation Stockpile
<b>PCBs</b>						
PCBs (total)	ug/kg	50000	NC		ND(360)	-
Aroclor 1016	ug/kg	50000	NC		ND(360)	-
Aroclor 1221	ug/kg	50000	NC		ND(360)	-
Aroclor 1232	ug/kg	50000	NC		ND(360)	-
Aroclor 1242	ug/kg	50000	NC		ND(360)	-
Aroclor 1248	ug/kg	50000	NC		ND(360)	-
Aroclor 1254	ug/kg	50000	NC		ND(360)	-
Aroclor 1260	ug/kg	50000	NC		ND(360)	-
<b>TCLP VOCs</b>						
Benzene	mg/L	NC	0.5		ND(0.025)	-
Carbon Tetrachloride	mg/L	NC	0.5		ND(0.025)	-
Chlorobenzene	mg/L	NC	100.0		ND(0.025)	-
Chloroform	mg/L	NC	6.0		ND(0.025)	-
1,2-Dichloroethane	mg/L	NC	0.5		ND(0.025)	-
1,1-Dichloroethylene	mg/L	NC	0.7		ND(0.070)	-
Methyl ethyl ketone	mg/L	NC	200.0		ND(0.25)	-
Tetrachloroethylene	mg/L	NC	0.7		ND(0.070)	-
Trichlorethylene	mg/L	NC	0.5		ND(0.050)	-
Vinyl Chloride	mg/L	NC	0.2		ND(0.025)	-

**Notes:**

ND() - Parameter non-detect at reporting limit within parenthesis

TSCA - Maximum concentration of PCBs as defined in the U.S. EPA's Toxic Substance Control Act

TCLP - Maximum concentration of contaminants for the toxicity characteristic as defined in the U.S. EPA's Title 40,

PCBs - Polychlorinated Biphenyls

SVOCs - Semivolatile Organic Compounds

VOCs - Volatile Organic Compounds

-- Parameter not analyzed

NC - no criteria

1.00	- Parameter exceeds applicable TSCA criteria.
------	---

**SUMMARY OF WASTE CHARACTERIZATION ANALYTICAL RESULTS  
FORMER ROCKWELL INTERNATIONAL CORPORATION  
ALLEGAN, MICHIGAN**

<i>Parameter</i>	<i>Units</i>	<i>TSCA Criteria</i>	<i>TCLP Criteria</i>	<i>Sample ID:</i> S-13151-072106-KK-361	S-13151-072706-KK-363
				<i>Date Sampled:</i> 7/21/2006	7/27/2006
				<i>Sample Location:</i> Excavation 5	Sewer Excavation
				Drum Stockpile	Stockpile
<i>TCLP SVOCs</i>					
o-Cresol	mg/L	NC	200.0	ND(0.004)	-
m-Cresol & p-Cresol	mg/L	NC	200.0	ND(0.04)	-
1,4-Dichlorobenzene	mg/L	NC	7.5	ND(0.004)	-
2,4-Dinitrotoluene	mg/L	NC	0.13	ND(0.02)	-
Hexachlorobenzene	mg/L	NC	0.13	ND(0.02)	-
Hexachlorobutadiene	mg/L	NC	0.5	ND(0.02)	-
Hexachloroethane	mg/L	NC	3.0	ND(0.02)	-
Nitrobenzene	mg/L	NC	2.0	ND(0.004)	-
Pentachlorophenol	mg/L	NC	100.0	ND(0.04)	-
Pyridine	mg/L	NC	5.0	ND(0.02)	-
2,4,5-Trichlorophenol	mg/L	NC	400.0	ND(0.02)	-
2,4,6-Trichlorophenol	mg/L	NC	2.0	ND(0.02)	-
<i>TCLP Metals</i>					
Arsenic	mg/L	NC	5.0	ND(0.5)	ND(0.5)
Barium	mg/L	NC	100.0	ND(10)	ND(10)
Cadmium	mg/L	NC	1.0	ND(0.1)	ND(0.1)
Chromium	mg/L	NC	5.0	ND(0.5)	ND(0.5)
Lead	mg/L	NC	5.0	ND(0.5)	ND(0.5)
Selenium	mg/L	NC	1.0	ND(0.25)	ND(0.25)
Silver	mg/L	NC	5.0	ND(0.5)	ND(0.5)
Mercury	mg/L	NC	0.2	ND(0.002)	ND(0.002)

**Notes:**

ND() - Parameter non-detect at reporting limit within parenthesis

TSCA - Maximum concentration of PCBs as defined in the U.S. EPA's Toxic Substance Control Act

TCLP - Maximum concentration of contaminants for the toxicity characteristic as defined in the U.S. EPA's Title 40, Part 261 Regulation (using the Toxicity Characteristic Leaching Procedure)

PCBs - Polychlorinated Biphenyls

SVOCs - Semivolatile Organic Compounds

VOCs - Volatile Organic Compounds

-- Parameter not analyzed

NC - no criteria

J - Estimated result. Result is less than RL.

1.00	- Parameter exceeds applicable TSCA criteria.
------	---

TABLE 3

SUMMARY OF EXCAVATION SOIL SAMPLING ANALYTICAL RESULTS - PCDD/PCDF  
FORMER ROCKWELL INTERNATIONAL CORPORATION  
ALLEGAN, MICHIGAN

Selected Parameters	Soil Cleanup Criteria		Sample ID: S-13151-062906-KK-348	Date Sampled: 6/29/2006	Sample Location: Excavation Area 5- Floor Excavation Area 5- Floor Excavation Area 5- Floor Excavation Area 5- Floor 5	Sample Depth (feet bgs)	Sample ID: S-13151-062906-KK-349	Date Sampled: 6/29/2006	Sample Location: Excavation Area 5- Floor Excavation Area 5- Floor Excavation Area 5- Floor Excavation Area 5- Floor 5	Sample Depth (feet bgs)	Sample ID: S-13151-063006-KK-350	Date Sampled: 6/30/2006	Sample Location: Excavation Area 5- Floor Excavation Area 5- Floor Excavation Area 5- Floor Excavation Area 5- Floor 5	Sample Depth (feet bgs)	Sample ID: S-13151-070506-KK-352	Date Sampled: 7/5/2006	Sample Location: Excavation Area 5- Floor Excavation Area 5- Floor Excavation Area 5- Floor Excavation Area 5- Floor 5	Sample Depth (feet bgs)
	0 - 2 feet bgs <sup>(b)</sup>	> 2 feet bgs <sup>(c)</sup>																
<i>Dioxin Furans</i>																		
2,3,7,8-Tetrachlorodibenzo-p-dioxin	pg/g		ND(4.0)	ND(8.6)	ND(4.7)	ND(6.4)	ND(5.1)	ND(5.1)	ND(6.4)	ND(5.1)	ND(5.1)	ND(5.1)	ND(6.4)	ND(5.1)	ND(5.1)	ND(5.1)	ND(6.4)	ND(5.1)
Total Tetrachlorodibenzo-p-dioxin	pg/g	1,000	ND(4.0)	ND(8.6)	ND(4.7)	ND(6.4)	ND(5.1)	ND(5.1)	ND(6.4)	ND(5.1)	ND(5.1)	ND(5.1)	ND(6.4)	ND(5.1)	ND(5.1)	ND(5.1)	ND(6.4)	ND(5.1)
1,2,3,7,8-Pentachlorodibenzofuran	pg/g		ND(8.5)	ND(9.7)	ND(8.9)	ND(10)	ND(8.7)	ND(8.7)	ND(10)	ND(8.7)	ND(8.7)	ND(10)	ND(10)	ND(8.7)	ND(8.7)	ND(8.7)	ND(10)	ND(8.7)
Total Pentachlorodibenzofuran	pg/g		ND(8.5)	ND(9.7)	ND(8.9)	ND(10)	ND(8.7)	ND(8.7)	ND(10)	ND(8.7)	ND(8.7)	ND(10)	ND(10)	ND(8.7)	ND(8.7)	ND(8.7)	ND(10)	ND(8.7)
1,2,3,4,7,8-Hexachlorodibenzo-p-dioxin	pg/g		ND(11)	ND(9.4)	ND(5.8)	ND(9.0)	ND(7.4)	ND(6.6)	ND(9.0)	ND(7.4)	ND(6.6)	ND(9.0)	ND(9.0)	ND(7.4)	ND(6.6)	ND(6.6)	ND(9.0)	ND(7.4)
1,2,3,6,7,8-Hexachlorodibenzo-p-dioxin	pg/g		ND(5.7)	ND(9.3)	ND(5.7)	ND(8.9)	ND(6.5)	ND(5.8)	ND(8.9)	ND(6.5)	ND(5.8)	ND(8.9)	ND(8.9)	ND(6.5)	ND(6.5)	ND(6.5)	ND(8.9)	ND(6.5)
1,2,3,7,8,9-Heptachlorodibenzo-p-dioxin	pg/g		ND(39)	ND(11)	ND(6.5)	ND(30)	ND(29)	ND(6.5)	ND(30)	ND(29)	ND(30)	ND(30)	ND(30)	ND(29)	ND(29)	ND(29)	ND(30)	ND(29)
Total Hexachlorodibenzo-p-dioxin	pg/g		ND(39)	ND(11)	ND(6.5)	ND(30)	ND(29)	ND(6.5)	ND(30)	ND(29)	ND(30)	ND(30)	ND(30)	ND(29)	ND(29)	ND(29)	ND(30)	ND(29)
1,2,3,4,6,7,8-Heptachlorodibenzo-p-dioxin	pg/g		ND(29)	ND(15)	ND(11)	ND(35)	ND(32)	ND(11)	ND(35)	ND(32)	ND(35)	ND(35)	ND(35)	ND(32)	ND(32)	ND(32)	ND(35)	ND(32)
Total Heptachlorodibenzo-p-dioxin	pg/g		ND(29)	ND(15)	ND(11)	ND(35)	ND(32)	ND(11)	ND(35)	ND(32)	ND(35)	ND(35)	ND(35)	ND(32)	ND(32)	ND(32)	ND(35)	ND(32)
1,2,3,4,6,7,8,9-Octachlorodibenzo-p-dioxin	pg/g		97 J B	ND(45)	85 J B	100 J B	36	87	100 J B	36	87	100 J B	36	87	100 J B	36	87	100 J B
2,3,7,8-Tetrachlorodibenzofuran	pg/g		ND(5.0)	ND(8.0)	ND(4.6)	ND(7.5)	ND(6.5)	ND(4.6)	ND(7.5)	ND(6.5)	ND(4.6)	ND(7.5)	ND(7.5)	ND(6.5)	ND(6.5)	ND(6.5)	ND(7.5)	ND(6.5)
Total Tetrachlorodibenzofuran	pg/g		ND(5.0)	ND(8.0)	ND(4.6)	ND(7.5)	ND(6.5)	ND(4.6)	ND(7.5)	ND(6.5)	ND(4.6)	ND(7.5)	ND(7.5)	ND(6.5)	ND(6.5)	ND(6.5)	ND(7.5)	ND(6.5)
1,2,3,4,7,8-Pentachlorodibenzofuran	pg/g		ND(4.9)	ND(6.6)	ND(4.6)	ND(5.5)	ND(5.0)	ND(4.6)	ND(5.5)	ND(5.0)	ND(4.6)	ND(5.5)	ND(5.5)	ND(5.0)	ND(5.0)	ND(5.0)	ND(5.5)	ND(5.0)
Total Pentachlorodibenzofuran	pg/g		ND(4.9)	ND(6.6)	ND(4.6)	ND(5.5)	ND(5.0)	ND(4.6)	ND(5.5)	ND(5.0)	ND(4.6)	ND(5.5)	ND(5.5)	ND(5.0)	ND(5.0)	ND(5.0)	ND(5.5)	ND(5.0)
1,2,3,4,7,8-Pentachlorodibenzo-p-dioxin	pg/g		ND(5.1)	ND(6.9)	ND(4.9)	ND(5.7)	ND(5.2)	ND(4.9)	ND(5.7)	ND(5.2)	ND(4.9)	ND(5.7)	ND(5.7)	ND(5.2)	ND(5.2)	ND(5.2)	ND(5.7)	ND(5.2)
Total Pentachlorodibenzo-p-dioxin	pg/g		ND(5.1)	ND(6.9)	ND(4.9)	ND(5.7)	ND(5.2)	ND(4.9)	ND(5.7)	ND(5.2)	ND(4.9)	ND(5.7)	ND(5.7)	ND(5.2)	ND(5.2)	ND(5.2)	ND(5.7)	ND(5.2)
1,2,3,4,7,8-Hexachlorodibenzofuran	pg/g		ND(7.7)	ND(16)	ND(7.1)	ND(14)	ND(16)	ND(7.1)	ND(14)	ND(16)	ND(7.1)	ND(14)	ND(14)	ND(16)	ND(16)	ND(16)	ND(14)	ND(16)
1,2,3,6,7,8-Hexachlorodibenzofuran	pg/g		ND(7.1)	ND(14)	ND(6.5)	ND(13)	ND(19)	ND(6.5)	ND(13)	ND(19)	ND(6.5)	ND(13)	ND(13)	ND(19)	ND(19)	ND(19)	ND(13)	ND(19)
2,3,4,6,7,8-Hexachlorodibenzofuran	pg/g		ND(8.0)	ND(16)	ND(7.3)	ND(14)	ND(26)	ND(7.3)	ND(14)	ND(26)	ND(7.3)	ND(14)	ND(14)	ND(26)	ND(26)	ND(26)	ND(14)	ND(26)
1,2,3,7,8,9-Heptachlorodibenzofuran	pg/g		ND(8.6)	ND(17)	ND(7.9)	ND(15)	ND(18)	ND(7.9)	ND(15)	ND(18)	ND(7.9)	ND(15)	ND(15)	ND(18)	ND(18)	ND(18)	ND(15)	ND(18)
Total Hexachlorodibenzofuran	pg/g		ND(8.6)	ND(17)	ND(7.9)	ND(15)	ND(18)	ND(7.9)	ND(15)	ND(18)	ND(7.9)	ND(15)	ND(15)	ND(18)	ND(18)	ND(18)	ND(15)	ND(18)
1,2,3,4,6,7,8-Heptachlorodibenzofuran	pg/g		ND(12)	430	ND(7.3)	430	1400	ND(7.3)	430	1400	ND(7.3)	430	430	1400	1400	1400	430	1400
1,2,3,4,7,8,9-Heptachlorodibenzofuran	pg/g		ND(3.2)	ND(5.2)	ND(3.6)	ND(4.8)	ND(5.0)	ND(3.6)	ND(4.8)	ND(5.0)	ND(3.6)	ND(4.8)	ND(4.8)	ND(5.0)	ND(5.0)	ND(5.0)	ND(4.8)	ND(5.0)
Total Heptachlorodibenzofuran	pg/g		ND(3.2)	ND(5.2)	ND(3.6)	ND(4.8)	ND(5.0)	ND(3.6)	ND(4.8)	ND(5.0)	ND(3.6)	ND(4.8)	ND(4.8)	ND(5.0)	ND(5.0)	ND(5.0)	ND(4.8)	ND(5.0)
1,2,3,4,6,7,8,9-Octachlorodibenzofuran	pg/g		ND(16)	640	ND(7.3)	490	2000	ND(7.3)	490	2000	ND(7.3)	490	490	2000	2000	2000	490	2000
TEQ	pg/g	1,000	0.097	4.41	0.085	4.4	0.085	4.41	0.085	4.4	0.085	4.4	4.4	14.437	14.437	14.437	4.4	14.437

TABLE 3

SUMMARY OF EXCAVATION SOIL SAMPLING ANALYTICAL RESULTS - PCDD/PCDF  
 FORMER ROCKWELL INTERNATIONAL CORPORATION  
 ALLEGAN, MICHIGAN

Notes:

- (1) - Michigan Act 451, Part 201, Rule 746, Table 2. Soil: Residential and Commercial I, Part 201 Generic Cleanup Criteria and Screening Levels, Direct Contact Criteria.
- (2) - Michigan Act 451, Part 201, Rule 748, Table 3. Soil: Industrial and Commercial II, III, and IV, Part 201 Generic Cleanup Criteria and Screening Levels, Industrial and Commercial II Direct Contact Criteria.

- bgs - below ground surface.
- mg/kg - micrograms per gram.
- mg/kg - milligrams per kilogram.
- pg/g - picograms per gram.
- ug/kg - micrograms per kilogram
- J - Method blank contamination.

The association method blank contains the target analyte at a reportable level.

B - Estimated result. Result is less than the Reporting Limit.

E - Matrix Interference.

ND(X) - Parameter non-detect at reporting limit within parenthesis

1.00 - Parameter exceeds Soil Cleanup Criteria for 0-2 feet bgs as defined in (1)

1.00 - Parameter exceeds Soil Cleanup Criteria for >2 feet bgs as defined in (2)

G - Elevated reporting limit. The reporting limit is elevated due to matrix interference.

CON - Confirmation analysis

SUMMARY OF EXCAVATION SOIL SAMPLING LNAPL TEST RESULTS  
FORMER ROCKWELL INTERNATIONAL CORPORATION  
ALLEGAN, MICHIGAN

Sample ID	Collection Date (mm/dd/yy)	Sample Location	Sample Depth	LNAPL Soil Test Requirements	
				Pass	Fail
LPL-13151-070306-KK-188	7/3/2006	Excavation Area 5- NON TSCA LNAPL	~15' bgs	X	
LPL-13151-070306-KK-189	7/3/2006	Excavation Area 5- NON TSCA LNAPL	~15' bgs	X	
LPL-13151-070306-KK-190	7/3/2006	Excavation Area 5- NON TSCA LNAPL	~15' bgs	X	
LPL-13151-070306-KK-191	7/3/2006	Excavation Area 5- NON TSCA LNAPL	~15' bgs	X	
LPL-13151-070306-KK-192	7/3/2006	Excavation Area 5- NON TSCA LNAPL	~15' bgs	X	
LPL-13151-070306-KK-193	7/3/2006	Excavation Area 5- NON TSCA LNAPL	~13-15' bgs	X	
LPL-13151-070506-KK-194	7/5/2006	Excavation Area 5- NON TSCA LNAPL	~15' bgs	X	
LPL-13151-070506-KK-195	7/5/2006	Excavation Area 5- NON TSCA LNAPL	~15' bgs	X	
LPL-13151-070506-KK-196	7/5/2006	Excavation Area 5- NON TSCA LNAPL	~15' bgs	X	
LPL-13151-070506-KK-197	7/5/2006	Excavation Area 5- NON TSCA LNAPL	~15' bgs	X	
LPL-13151-070506-KK-198	7/5/2006	Excavation Area 5- NON TSCA LNAPL	~15' bgs	X	
LPL-13151-070506-KK-201	7/5/2006	Excavation Area 5- NON TSCA LNAPL	~15' bgs	X	
LPL-13151-070506-KK-202	7/5/2006	Excavation Area 5- NON TSCA LNAPL	~15' bgs	X	
LPL-13151-070506-KK-203	7/5/2006	Excavation Area 5- NON TSCA LNAPL	~15' bgs	X	
LPL-13151-070506-KK-204	7/5/2006	Excavation Area 5- NON TSCA LNAPL	~15' bgs	X	
LPL-13151-070506-KK-205	7/5/2006	Excavation Area 5- NON TSCA LNAPL	~15' bgs	X	
LPL-13151-070506-KK-206	7/5/2006	Excavation Area 5- NON TSCA LNAPL	~15' bgs	X	
LPL-13151-070506-KK-207	7/5/2006	Excavation Area 5- NON TSCA LNAPL	~18' bgs	X	
LPL-13151-070606-KK-208	7/3/2006	Excavation Area 5- NON TSCA LNAPL	~18' bgs	X	
LPL-13151-070606-KK-209	7/6/2006	Excavation Area 5- NON TSCA LNAPL	~18' bgs	X	
LPL-13151-070606-KK-210	7/6/2006	Excavation Area 5- NON TSCA LNAPL	~18' bgs	X	
LPL-13151-070606-KK-211	7/6/2006	Excavation Area 5- NON TSCA LNAPL	~18' bgs	X	
LPL-13151-070606-KK-212	7/6/2006	Excavation Area 5- NON TSCA LNAPL	~16-18' bgs	X	
LPL-13151-070706-KK-213	7/7/2006	Excavation Area 5 - TSCA LNAPL	~18-19' bgs	X	
LPL-13151-071006-KK-214	7/10/2006	Excavation Area 5 - TSCA LNAPL	~18-19' bgs	X	
LPL-13151-071006-KK-215	7/10/2006	Excavation Area 5 - TSCA LNAPL	~18-19' bgs	X	
LPL-13151-071006-KK-216	7/10/2006	Excavation Area 5 - TSCA LNAPL	~16-19' bgs	X	
LPL-13151-071006-KK-217	7/10/2006	Excavation Area 5 - TSCA LNAPL	~18-19' bgs	X	
LPL-13151-071006-KK-218	7/10/2006	Excavation Area 5 - TSCA LNAPL	~18-19' bgs	X	
LPL-13151-071006-KK-219	7/10/2006	Excavation Area 5 - TSCA LNAPL	~16-19' bgs	X	
LPL-13151-071006-KK-220	7/10/2006	Excavation Area 5 - TSCA LNAPL	~18-19' bgs	X	
LPL-13151-071006-KK-221	7/10/2006	Excavation Area 5 - TSCA LNAPL	~18-19' bgs	X	
LPL-13151-071006-KK-222	7/10/2006	Excavation Area 5 - TSCA LNAPL	~16-19' bgs	X	
LPL-13151-071006-KK-223	7/10/2006	Excavation Area 5 - TSCA LNAPL	~18-19' bgs	X	
LPL-13151-071006-KK-224	7/10/2006	Excavation Area 5 - TSCA LNAPL	~18-19' bgs	X	
LPL-13151-071006-KK-225	7/10/2006	Excavation Area 5 - TSCA LNAPL	~18-19' bgs	X	
LPL-13151-071006-KK-226	7/10/2006	Excavation Area 5 - TSCA LNAPL	~18-19' bgs	X	

## Notes:

bgs - below ground surface.

N/A- no data available

SUMMARY OF WASTE WATER ANALYTICAL RESULTS  
FORMER ROCKWELL INTERNATIONAL CORPORATION  
ALLEGAN, MICHIGAN

<i>Sample ID</i>	<i>Collection Date (mm/dd/yy)</i>	<i>Sample Location</i>	<i>Discharge Permit Requirements</i>	
			<i>Pass</i>	<i>Fail</i>
W-37326-070306-KK-060	07/03/06	Tank #255609	X	
W-37326-070306-KK-061	07/03/06	Tank #259944	X	
W-37326-071106-KK-062	07/11/06	Tank #255609	X	
W-37326-071206-KK-063	07/12/06	Tank #259944	X	
W-37326-071406-KK-064	07/14/06	Tank #255609	X	
W-37326-071806-KK-065	07/18/06	Tank #259944	X	
W-37326-071906-KK-066	07/18/06	Tank #255609	X	
W-37326-072006-KK-067	07/20/06	Tank #259944	X	
W-37326-072106-KK-068	07/21/06	Tank #255609	X	