



**CONESTOGA-ROVERS
& ASSOCIATES**

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February 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. 39
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 January 1, 2006 through January 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 February 10, 2006.

1. Activities Taken to Comply with the Administrative Order

During this reporting period, the following activities were undertaken:

- On January 10, 2006, Monthly Progress Report No. 38 was submitted to the U.S. EPA covering the period of December 1, through December 31, 2005; and
- Weekly Site inspections were conducted on January 6, 12, 18, and 25, 2006.

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

No samples or analytical results were collected or received during this reporting period.

3. Actions Planned for the Next 90-Days

The following activities are anticipated for the next 90 days:

- Weekly Site inspections; and
- Preparation of the Site for spring mobilization.

REGISTERED COMPANY
ISO 9001
ENGINEERING DESIGN



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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.

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

A handwritten signature in black ink, appearing to read 'Gregory A. Carli', is written over a faint, larger version of the same signature.

Gregory A. Carli, P. E.

JP/p/12

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