SITE REMEDIATION REPORT

Medical Center Property
413 Lee Avenue
Crystal Springs, Mississippi

Prepared for

BorgWarner Inc.

April 2001

GeoEnvironmental Associates, LLC | MARTIN&SLAGLE

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Prepared by

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TABLE OF CONTENTS

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Medical Center Property
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1.0	**Executive Summary**		**1-1**
2.0	**Introduction**		**2-1**
	2.1	Background	2-1
	2.2	Site Description	2-2
	2-2	Investigative Activities	2-3
3.0	**Sampling Program**		**3-1**
4.0	**Analytical Results**		**4-1**
5.0	**Nature and Extent of Contamination**		**5-1**
6.0	**Summary and Conclusions**		**6-1**

SITE MAPS
TABLES

APPENDIX 1	**Analytical Data Tables**
APPENDIX 2	**Manifests**
APPENDIX 3	**Chains of Custody**
APPENDIX 4	**Photographs**

SECTION 1.0 EXECUTIVE SUMMARY

The soil on the Medical Center property, located at 413 Lee Avenue, Crystal Springs, Mississippi, and consisting of approximately 0.53 acres, was found to contain concentrations of polychlorinated biphenyls (PCBs) during sampling events conducted in August and September 2000. The concentrations, in some areas of the property, exceeded the standard of 1.0 mg/kg established by Mississippi Department of Environmental Quality for PCBs in soils on residential properties.

The soil containing concentrations of PCBs in excess of 1.0 mg/kg was remediated by removal and replaced with clean soil. Impacted soil was excavated to the property line common with the Kuhlman Electric Corporation's (KEC) plant property and disposed of in the BFI "Little Dixie" Subtitle D landfill in accordance with all applicable state and federal regulations.

Confirmatory soil samples were collected following excavation to confirm that impacted soil had been removed. A total of 169 floor samples and 229 sidewall samples were collected following removal of soil. All soil samples were collected and managed in accordance with USEPA Region IV Environmental Investigation Standard Operating Procedure and Quality Assurance Manual (EISOPQAM) protocols.

Three areas of the site were excavated to an average depth of 2 feet bgs. Excavation continued until on-site laboratory analytical results confirmed that all soil containing concentrations of PCBs exceeding the residential cleanup thresholds was removed. The analytical results indicate that all soil containing 1.0 mg/kg or greater were removed from the Medical Center property. After confirmation results indicated that the remediation objective had been met, the excavation was backfilled with analytically confirmed clean soil. The surface of the remediation area was covered with fresh sod.

On October 16, 2000 the Medical Center property was effectively remediated by removal of soil containing PCB concentrations in excess of 1.0 mg/kg in accordance with the

residential property cleanup thresholds. No further action is warranted at the Medical Center property.

SECTION 2 INTRODUCTION

The soil on the Medical Center property was found to contain concentrations of polychlorinated biphenyls (PCBs) during sampling events conducted in August and September 2000. The concentrations, in some areas of the property, exceeded the standard of 1.0 milligrams per kilograms (mg/kg) established by Mississippi Department of Environmental Quality for PCBs in soils on residential properties. The soil containing concentrations of PCBs in excess of 1.0 mg/kg was remediated by removal and replaced with clean soil. This report describes the remediation process, results of soil analysis analytical results. The report also includes maps showing sample locations and the areas of remediation.

The Medical Center property is located at 413 Lee Avenue, Crystal Springs, Mississippi. This property is located southeast and adjacent to the Kuhlman property. The site includes a single building situated on approximately 0.53 acres.

2.1 Background

The Kuhlman Electric Corporation (KEC) facility was constructed and has been operated as a transformer manufacturing plant since the 1950s by KEC or its predecessor, a corporate entity also named KEC. KEC continued to own and operate the plant in March 1999 when BorgWarner Inc. purchased Kuhlman Corporation, the parent of KEC, and thereafter as well. Neither BorgWarner nor Kuhlman Corporation has ever owned or operated the plant. Seven months after the purchase, on October 1, 1999, BorgWarner and Kuhlman Corporation sold KEC's stock to the Carlyle Group. BorgWarner and Kuhlman Corporation agreed to indemnify KEC and the Carlyle Group for historic contamination at the site and may, under the purchase agreement, control any remediation of such contamination.

During routine construction activities at KEC's plant in Crystal Springs, Mississippi, construction personnel encountered soil that had been stained by unknown chemicals.

KEC reported that construction activities were immediately halted, and two soil samples were collected by representatives of KEC and sent to an independent laboratory for analysis. KEC reported the detection of the PCB, Aroclor 1268, in the stained soils, along with various chlorinated benzenes.

On April 19, 2000, BorgWarner received notification from KEC in accordance with the purchase agreement that areas of contaminated soil had been found in Crystal Springs, Mississippi. BorgWarner responded by sending a representative to meet with KEC plant representatives and a representative from Mississippi Department of Environmental Quality (MDEQ), Eric Dear, on April 25, 2000. During this meeting all parties were briefed on the existing situation at the plant and MDEQ's expectations regarding assessment of the site.

In May 2000, a preliminary assessment of the KEC property was conducted. The goal of this preliminary assessment was to:

- Determine the character and concentration of the contaminants in various environmental media on-site,
- Determine if contaminants might have migrated from the site, and,
- Identify and conduct any immediate response actions necessary to alleviate public exposure to the contaminants.

The results of the preliminary assessment indicated a likelihood that PCBs had migrated off site and on to adjacent residential properties. An assessment of the adjacent properties was initiated and remedial activities were subsequently completed on three properties with confirmed concentrations of PCBs exceeding the residential cleanup thresholds.

2.2 Site Description

The Medical Center property consists of 0.53 acres located southeast of the KEC property. The Medical Center property abuts the east side of the south employee parking lot (Figure 1). Storm water runoff from the parking lot flows onto the northwest portion of the Medical Center property.

The Medical Center property is generally flat, sloping gently to the south toward Lee Avenue. PCB concentrations exceeding the residential cleanup thresholds were found in three separate areas in the northern and eastern portions of the property and the western edge.

2.3 Investigative Activities

Soil samples were collected on a 20-foot grid during the initial assessment activities. Samples were collected using a direct-push soil sampler. A detailed description of sampling techniques used during this investigation is included in the *Preliminary Site Characterization Report* (Ogden 2000). Samples were analyzed by the on site laboratory for PCBs using a modified EPA Method 8080. Ten percent of the samples were split for confirmation analysis by the fixed-base laboratory, Paradigm Analytical Labs (Paradigm) located in Wilmington, North Carolina. All sampling as performed in accordance with EPA Region IV Environmental Investigation Standard Operating Procedures and Quality Assurance Manual (EISQAM).

Remedial activities were initiated in those areas confirmed to be impacted with PCBs in concentrations exceeding the residential cleanup thresholds. Soil was excavated and disposed of at BFI's "Little Dixie" solid waste landfill in Madison County, a Subtitle D landfill, in accordance with all applicable State and federal regulations. Soil samples were collected on an average 10-foot grid following excavation to confirm that all impacted soil had been removed. Excavation continued until on site laboratory analytical

results confirmed that all soil containing concentrations of PCBs exceeding the residential cleanup thresholds was removed.

The following report provides details of the sampling, analytical, and remedial activities performed at the Medical Center property.

SECTION 3.0 SAMPLING PROGRAM – LOCATION AND RATIONALE

Remediation of the Medical Center property, on 413 Lee Avenue, began on October 16, 2000. Remediation of this property involved excavation and disposal of all soil containing 1.0 mg/kg or greater of PCBs in accordance with MDEQ's established clean-up criteria for residential properties. All soils containing greater than 1.0 mg/kg of PCBs were profiled and disposed of at the BFI's "Little Dixie" Subtitle D Landfill in Madison County, Mississippi after MDEQ and US EPA approvals were obtained.

Following excavation, all excavated areas were sampled to confirm that impacted soil had been removed. In a correspondence regarding disposal requirements, Craig Brown, of US EPA Region IV, stated that the excavated soils did not meet the definition of "PCB remediation waste." Under this definition, the remediation activities fell under the management criteria and guidelines set by MDEQ. Remediation was based on criteria established in the *State of Michigan Department of Environmental Quality, Waste Management Division, Guidance Document, Verification of Soil Remediation, April 1994, Revision 1*, as adopted by Mississippi DEQ for use on projects of this nature.

The guidance document provides a procedure for establishing a soil-sampling grid for confirmation that cleanup goals have been met or exceeded. The procedure applies to sites with a surface area greater than 10,890 square feet. The grid spacing is determined by the following equation:

$$(A/\pi)^{1/2} /4=GI$$

where: A = grid area (ft^2)

GI = grid interval

$\pi = 3.14159$

Based on a total remediation area of 13,200 ft^2, the maximum grid sampling grid spacing was determined to be 16.2 ft. A conservative average spacing of 10 ft was used to confirm that impacted soils had been removed from the site. The 10 ft grid spacing applied to the excavation floor samples as well as the excavation sidewall samples.

All samples were collected in accordance with EPA Region IV EISOPQAM. A total of 229 sidewall samples and 169 excavation floor samples were collected for confirmation of remediation. Sample locations are shown in Figure 2. A total of 40 duplicate samples were collected for laboratory quality control. The analytical results indicate that all soil containing 1.0 mg/kg or greater were removed from the Medical Center property. Analytical results are included in Appendix 1.

The sample locations shown on Figure 2 are only those with analytical results less than 1.0 mg/kg and which confirm the removal of PCB contaminated soil. Table 1 contains analytical results that confirm remediation, and Appendix 1 contains data sheets of all samples collected during the remediation process.

SECTION 4.0 ANALYTICAL PROGRAM

All soil samples were collected and managed in accordance with USEPA Region IV EISOPQAM protocols. Samples were collected using clean sampling equipment. Equipment rinseate samples were collected and analyzed to confirm the effectiveness of the decontamination procedures.

Each sample was assigned a unique sample identification designation in accordance with the labeling requirements under section 3.2.1 of the EISOPQAM. Field records were kept in accordance with procedures specified in section 3.5 of EISOPQAM. The sample identification designation, date, and time of collection was recorded in the field book and on the chain of custody for cross-referencing.

Upon collection, samples were placed in 4 oz amber glass jars, and the jars were transferred to a small sample cooler. Field personnel delivered samples to the mobile lab several times each day. Upon arrival at the mobile lab, the samples were transferred to the ECCS sample custodian who logged each sample on ECCS chains of custody. Each sample was assigned a unique ECCS internal ID for tracking purposes. After analysis, the samples were transferred to either a sample refrigerator in the mobile lab or stored in coolers until they were either sent to Paradigm for confirmation analysis or disposed of on-site. Chains of custody were completed for all samples packaged and shipped to Paradigm for confirmation analysis.

Analytical Procedures

For analysis of samples in the field lab, ECCS used EPA 8082m, modified for the mini extraction.

Paradigm Analytical also used EPA 8082 for quantitation of PCBs.

SECTION 5.0 REMEDIATION AND DISPOSAL

Remediation of the Medical Center property, at 413 Lee Avenue, began on October 16, 2000. Remediation of this property involved excavation to the property line common with the Kuhlman Electric Corporation's (KEC) plant property and disposal of all soil containing 1.0 mg/kg or greater of PCBs in accordance with MDEQ's established clean-up criteria for residential properties. All soils containing greater than 1.0 mg/kg of PCBs were profiled and disposed of at the BFI's "Little Dixie" Subtitle D Landfill in Madison County, Mississippi after MDEQ and US EPA approvals were obtained.

Three areas totaling approximately 13,200 ft^2 were excavated to an average depth of 2 feet bgs. Excavation was accomplished using a track-mounted backhoe and "Bobcat" front-end loader. Excavated soil was placed directly into a plastic lined roll-off box and transported to the landfill when full. Soil was removed from live oak tree roots using an "Air Shovel"™ which is a unique technology adopted specifically for this purpose. The Air Shovel™ uses a pressure spray to dislodge soil from around the roots while a vacuum system removes the soil and water by vacuuming into a tank.

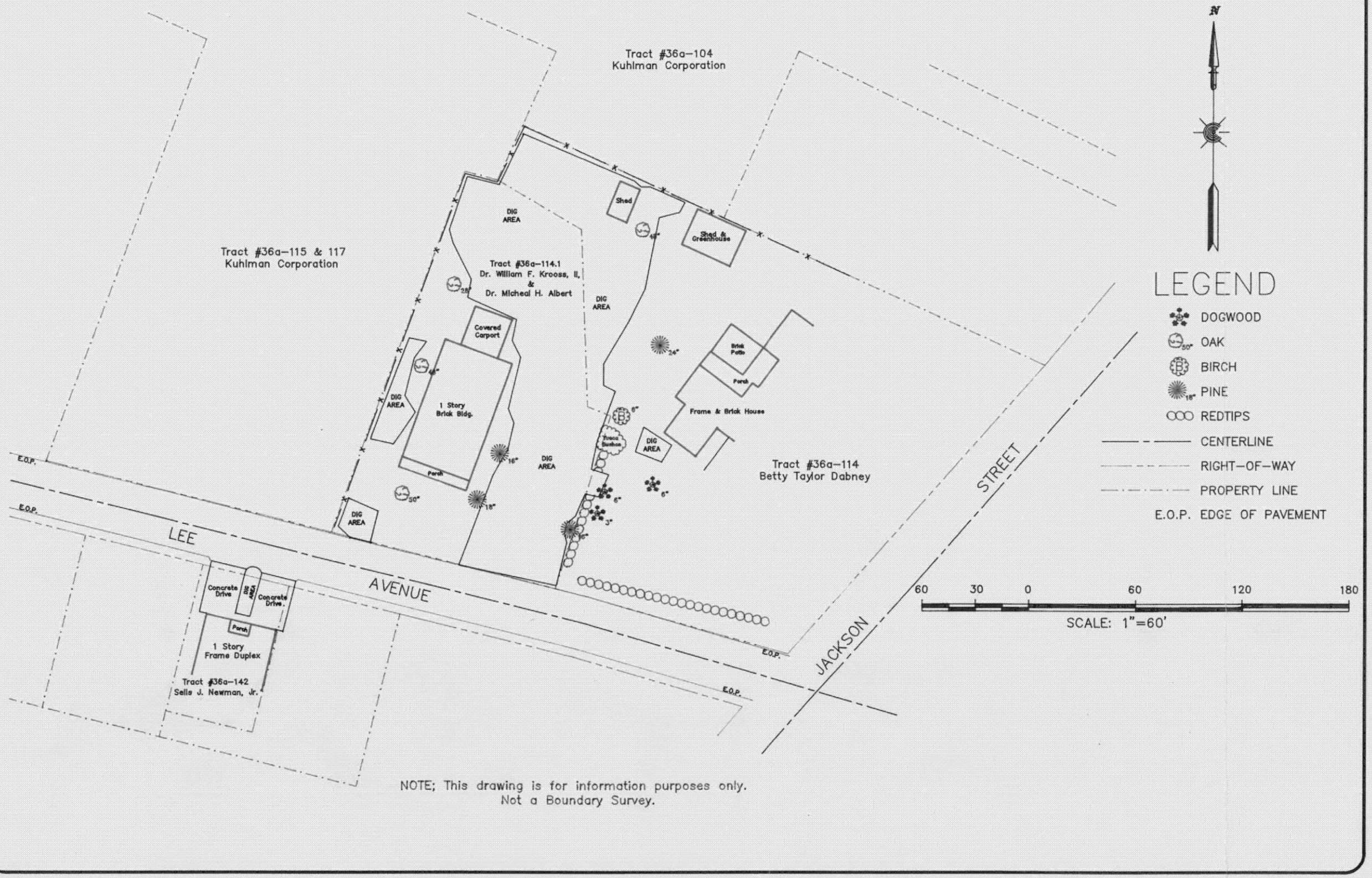
Contaminated soil was removed from the west side of the property to the edge of the property. Soil samples that were collected along the property line that abuts the KEC parking lot had elevated levels of PCB with concentrations above the remediation goal. Excavation was terminated at the property line. The remaining contaminated soil on the property line will be remediated when the KEC property is remediated.

A total of 1119.57 tons of soil were removed from the site in 80 20-yd^3 roll-off boxes. Waste manifests are included in Appendix 2.

SECTION 6.0 SUMMARY AND CONCLUSIONS

The Medical Center property was effectively remediated of soil containing PCB concentrations of 1 mg/kg or more in accordance with the residential property cleanup thresholds. Confirmation sampling in the impacted area was performed in accordance with applicable state requirements to demonstrate that the remediation goals were met.

No further action is warranted at the Medical Center property.



NOTE; This drawing is for information purposes only.
Not a Boundary Survey.

SITE REMEDIATION
PROPERTY LINE MAP
PROJECT NO.: BW00–1

DR: RRB | CHK: RLM | REV: 0 | DATE: 4/12/01

SCALE 1"=60'

FIGURE 1

SURVEYED BY: *MAPTECH, INC.*

PREPARED FOR: **BorgWarner Inc.**

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LEGEND

- CENTERLINE
- RIGHT-OF-WAY
- PROPERTY LINE
- MCEFS = SAMPLE LOCATION
- MC MEDICAL CENTER PROPERTY
- DS DABNEY/SMITH PROPERTY
- EFS Excavation Floor Sample
- ESS Excavation Sidewall Sample
- 50" OAK
- 18" PINE

Tract #36a-114.1
Dr. William F. Krooss, II,
&
Dr. Micheal H. Albert

DIG AREA

Shed

Covered Carport

1 Story Brick Bldg.

Porch

48"

28"

50"

16"

18"

LEE AVENUE

N

20 10 0 20 40 60

SCALE: 1"=20'

GeoEnvironmental Associates, LLC MARTIN&SLAGLE PO Box 1023 Black Mountain NC 28711 828.669.3929 828.669.5289	PREPARED FOR: BorgWarner Inc.	SURVEYED BY: *MAPTECH, INC.*	SITE REMEDIATION Medical Center Property SAMPLE LOCATION MAP PROJECT NO.: BW00-1 DWG NO: 324A-0343-1100-102-01c DRWN: RRB CHK: RLM REV: 0 DATE: 4/12/01	SCALE 1"=20'	FIGURE 2

TABLE 1
SUMMARY OF DATA SHOWING CONFIRMATION OF REMEDIATION

					Field Laboratory		Fixed Laboratory	
Field Lab Sample ID	Sample ID	Sample Depth (ft bgs)	Date Collected	Time Collected	Date Analyzed	Concentration (mg/kg)	Date Analyzed	Concentration (mg/kg)
1282	MC- ESS-34	0.1	24-Oct-00	14:02	24-Oct-00	0.68		
1283	MC- ESS-34	0.5	24-Oct-00	14:04	24-Oct-00	0.41		
1284	MC- ESS-35	0.1	24-Oct-00	15:50	24-Oct-00	0.55		
1285	MC- ESS-35	0.5	24-Oct-00	15:52	24-Oct-00	0.16		
1307	MC- ESS-36	0.1	24-Oct-00	15:57	24-Oct-00	0.44	15-Nov-00	0.62
1286	MC- ESS-36	0.5	24-Oct-00	16:00	24-Oct-00	0.44		
1287	MC- ESS-37	0.1	24-Oct-00	16:02	24-Oct-00	0.87		
1288	MC- ESS-37	0.5	24-Oct-00	16:07	24-Oct-00	0.68		
1289	MC- ESS-38	0.1	24-Oct-00	16:10	24-Oct-00	0.42		
1290	MC- ESS-38	0.5	24-Oct-00	16:12	24-Oct-00	0.18		
1291	MC- ESS-39	0.1	24-Oct-00	16:15	24-Oct-00	0.59		
1292	MC- ESS-39	0.5	24-Oct-00	16:17	24-Oct-00	0.25		
1293	MC- ESS-40	0.1	24-Oct-00	16:20	24-Oct-00	0.27		
1294	MC- ESS-40	0.5	24-Oct-00	16:22	24-Oct-00	0.49	15-Nov-00	0.96
1295	MC- ESS-41	0.1	24-Oct-00	16:40	24-Oct-00	0.30		
1296	MC- ESS-41	0.5	24-Oct-00	16:43	24-Oct-00	< 0.10		
1297	MC- ESS-42	0.1	24-Oct-00	16:46	24-Oct-00	0.23		
1298	MC- ESS-42	0.5	24-Oct-00	16:49	24-Oct-00	< 0.10		
1299	MC- ESS-43	0.1	24-Oct-00	16:53	24-Oct-00	< 0.10		
1300	MC- ESS-43	0.5	24-Oct-00	16:55	24-Oct-00	< 0.10		
1301	MC- ESS-44	0.1	24-Oct-00	17:00	24-Oct-00	0.55		
1302	MC- ESS-44	0.5	24-Oct-00	17:03	24-Oct-00	< 0.10	15-Nov-00	<0.14
1303	MC- ESS-45	0.3	24-Oct-00	17:07	24-Oct-00	< 0.10		
1304	MC- ESS-45	0.5	24-Oct-00	17:09	24-Oct-00	< 0.10		
1305	MC- ESS-46	0.3	24-Oct-00	17:12	24-Oct-00	< 0.10		
1306	MC- ESS-46	0.5	24-Oct-00	17:15	24-Oct-00	< 0.10		
1308	MC- ESS-69	0.1	25-Oct-00	11:26	25-Oct-00	0.22		
1343	MC- ESS-52	0.1	26-Oct-00	9:19	26-Oct-00	0.42		
1344	MC- ESS-52	0.5	26-Oct-00	9:21	26-Oct-00	0.46		
1345	MC- ESS-53	0.1	26-Oct-00	9:14	26-Oct-00	0.69	15-Nov-00	0.57
1346	MC- ESS-53	0.5	26-Oct-00	9:16	26-Oct-00	0.35		
1347	MC- ESS-54	0.1	26-Oct-00	9:12	26-Oct-00	0.52		
1348	MC- ESS-54	0.5	26-Oct-00	9:10	26-Oct-00	0.20		
1371	MC- ESS-82	0.1	26-Oct-00	15:12	26-Oct-00	0.57		
1372	MC- ESS-82	0.5	26-Oct-00	15:14	26-Oct-00	0.42		
1373	MC- ESS-83	0.1	26-Oct-00	15:18	26-Oct-00	0.49		
1374	MC- ESS-83	0.5	26-Oct-00	15:20	26-Oct-00	0.55		
1375	MC- ESS-84	0.1	26-Oct-00	15:22	26-Oct-00	0.44		
1376	MC- ESS-84	0.5	26-Oct-00	15:24	26-Oct-00	0.29		
1377	MC- ESS-85	0.1	26-Oct-00	15:27	26-Oct-00	0.65	15-Nov-00	0.88
1378	MC- ESS-85	0.5	26-Oct-00	15:29	26-Oct-00	0.20		
1379	MC- ESS-86	0.1	26-Oct-00	15:34	26-Oct-00	0.35		
1380	MC- ESS-86	0.5	26-Oct-00	15:32	26-Oct-00	0.41		
1389	MC- ESS-87		28-Oct-00	11:42	28-Oct-00	**1.4**		
1390	MC- ESS-88		28-Oct-00	11:44	28-Oct-00	0.32		
1391	MC- ESS-89		28-Oct-00	11:46	28-Oct-00	0.10		
1392	MC- ESS-90		28-Oct-00	11:47	28-Oct-00	**4.8** [E]		

Samples shown in bold were collected from locations along the common boundary with KEC.

TABLE 1
SUMMARY OF DATA SHOWING CONFIRMATION OF REMEDIATION

					Field Laboratory		Fixed Laboratory	
Field Lab Sample ID	Sample ID	Sample Depth (ft bgs)	Date Collected	Time Collected	Date Analyzed	Concentration (mg/kg)	Date Analyzed	Concentration (mg/kg)
1393	MC- ESS-91		28-Oct-00	11:52	28-Oct-00	0.21		
1394	MC- ESS-92		28-Oct-00	11:54	28-Oct-00	**4.4** [E]		
1395	MC- ESS-93		28-Oct-00	11:57	28-Oct-00	0.22		
1396	MC- ESS-94		28-Oct-00	11:58	28-Oct-00	**3.6**		
1397	MC- ESS-95		28-Oct-00	12:05	28-Oct-00	0.23		
1398	MC- EFS-17		28-Oct-00	11:49	28-Oct-00	0.38		
1399	MC- EFS-18		28-Oct-00	11:55	28-Oct-00	0.65		
1400	MC- EFS-19		28-Oct-00	12:03	28-Oct-00	**2.1**	15-Nov-00	**3.1**
1401	MC- ESS-96		28-Oct-00	13:35	28-Oct-00	**8.1** [E]		
1402	MC- ESS-97		28-Oct-00	13:39	28-Oct-00	0.64		
1404	MC- ESS-99		28-Oct-00	13:41	28-Oct-00	**12** [E]		
1406	MC- ESS-101		28-Oct-00	13:43	28-Oct-00	**5.5** [E]	15-Nov-00	**6.3**
1407	MC- ESS-102		28-Oct-00	13:45	28-Oct-00	0.50		
1408	MC- ESS-103		28-Oct-00	13:43	28-Oct-00	0.58		
1409	MC- EFS-20		28-Oct-00	13:37	29-Oct-00	0.13		
1410	MC- EFS-21		28-Oct-00	13:42	29-Oct-00	0.18		
1411	MC- EFS-22		28-Oct-00	13:44	29-Oct-00	< 0.10		
1412	MC- EFS-23		28-Oct-00	13:47	29-Oct-00	0.85		
1413	MC- ESS-104		28-Oct-00	14:31	29-Oct-00	0.78		
1414	MC- ESS-105		28-Oct-00	14:34	29-Oct-00	0.34		
1415	MC- ESS-106		28-Oct-00	14:36	29-Oct-00	0.61		
1417	MC- ESS-108		28-Oct-00	14:38	29-Oct-00	**2.3**		
1418	MC- EFS-24		28-Oct-00	14:32	29-Oct-00	< 0.10		
1419	MC- EFS-25		28-Oct-00	14:35	29-Oct-00	< 0.10		
1454	MC- ESS-109		29-Oct-00	14:45	30-Oct-00	0.53		
1455	MC- ESS-110		29-Oct-00	14:44	30-Oct-00	0.22		
1456	MC- ESS-111		29-Oct-00	14:43	30-Oct-00	0.25		
1457	MC- ESS-112		29-Oct-00	14:42	30-Oct-00	0.47		
1458	MC- ESS-113		29-Oct-00	14:42	30-Oct-00	0.18	15-Nov-00	0.16
1505	MC- ESS-123		31-Oct-00	15:09	31-Oct-00	**17** [E]		
1506	MC- ESS-124		31-Oct-00	15:15	31-Oct-00	**21** [E]		
1507	MC- ESS-125		31-Oct-00	15:20	31-Oct-00	**17** [E]		
1508	MC- ESS-126		31-Oct-00	15:23	31-Oct-00	**17** [E]		
1509	MC- ESS-127		31-Oct-00	15:27	31-Oct-00	**23** [E]		
1512	MC- ESS-131		01-Nov-00	10:54	01-Nov-00	**3.7**		
1518	MC- EFS-26		01-Nov-00	11:25	01-Nov-00	< 0.10		
1519	MC- EFS-27		01-Nov-00	11:27	01-Nov-00	< 0.10		
1520	MC- EFS-28		01-Nov-00	11:29	01-Nov-00	< 0.10		
1521	MC- EFS-29		01-Nov-00	11:32	01-Nov-00	< 0.10		
1522	MC- ESS-130		01-Nov-00	10:50	01-Nov-00	**8.1** [E]		
1523	MC- EFS-30		01-Nov-00	13:40	01-Nov-00	0.17		
1524	MC- EFS-31		01-Nov-00	13:44	01-Nov-00	< 0.10	17-Nov-00	<0.098
1525	MC- EFS-32		01-Nov-00	13:47	01-Nov-00	**2.8**		
1526	MC- EFS-33		01-Nov-00	13:50	01-Nov-00	**9.2** [E]		
1527	MC- EFS-34		01-Nov-00	14:00	01-Nov-00	**6.9** [E]		
1528	MC- EFS-35		01-Nov-00	14:05	01-Nov-00	**9.1** [E]		

Samples shown in bold were collected from locations along the common boundary with KEC.

TABLE 1
SUMMARY OF DATA SHOWING CONFIRMATION OF REMEDIATION

					Field Laboratory		Fixed Laboratory	
Field Lab Sample ID	Sample ID	Sample Depth (ft bgs)	Date Collected	Time Collected	Date Analyzed	Concentration (mg/kg)	Date Analyzed	Concentration (mg/kg)
1529	MC- EFS-36		01-Nov-00	14:10	01-Nov-00	**2.4**		
1530	MC- EFS-37		01-Nov-00	14:15	01-Nov-00	0.85		
1562	MC- EFS-38		03-Nov-00	13:35	03-Nov-00	< 0.10		
1563	MC- EFS-39		03-Nov-00	13:40	03-Nov-00	< 0.10		
1564	MC- EFS-40		03-Nov-00	13:50	03-Nov-00	< 0.10		
1565	MC- EFS-41		03-Nov-00	14:00	03-Nov-00	< 0.10		
1566	MC- EFS-42		03-Nov-00	14:05	03-Nov-00	< 0.10		
1567	MC- EFS-43		03-Nov-00	14:10	03-Nov-00	< 0.10		
1568	MC- EFS-44		03-Nov-00	14:15	03-Nov-00	< 0.10		
1569	MC- EFS-45		03-Nov-00	14:20	03-Nov-00	< 0.10		
1570	MC- EFS-46		03-Nov-00	14:22	03-Nov-00	< 0.10		
1571	MC- EFS-47		03-Nov-00	14:25	03-Nov-00	< 0.10		
1572	MC- EFS-48		03-Nov-00	14:27	04-Nov-00	< 0.10		
1573	MC- EFS-54		03-Nov-00	14:48	04-Nov-00	< 0.10		
1574	MC- EFS-55		03-Nov-00	14:50	03-Nov-00	< 0.10		
1575	MC- EFS-58		03-Nov-00	14:58	04-Nov-00	< 0.10		
1576	MC- EFS-59		03-Nov-00	15:00	04-Nov-00	< 0.10		
1577	MC- EFS-49		03-Nov-00	14:30	04-Nov-00	< 0.10		
1578	MC- EFS-50		03-Nov-00	14:34	04-Nov-00	< 0.10		
1579	MC- EFS-51		03-Nov-00	14:40	04-Nov-00	< 0.10		
1580	MC- EFS-52		03-Nov-00	14:42	04-Nov-00	0.44		
1581	MC- EFS-53		03-Nov-00	14:45	04-Nov-00	< 0.10		
1582	MC- EFS-56		03-Nov-00	14:52	04-Nov-00	< 0.10		
1583	MC- EFS-57		03-Nov-00	14:55	04-Nov-00	< 0.10		
1584	MC- EFS-60		03-Nov-00	15:03	04-Nov-00	< 0.10		
1585	MC- EFS-61		03-Nov-00	15:09	04-Nov-00	< 0.10	17-Nov-00	<0.099
1587	MC- ESS-137		04-Nov-00	8:20	04-Nov-00	< 0.10		
1588	MC- ESS-138		04-Nov-00	8:24	04-Nov-00	< 0.10		
1589	MC- EFS-62		04-Nov-00	8:30	04-Nov-00	< 0.10		
1591	MC- ESS-139		04-Nov-00	10:20	04-Nov-00	0.14		
1592	MC- EFS-63		04-Nov-00	16:25	04-Nov-00	< 0.10		
1593	MC- EFS-64		04-Nov-00	16:26	04-Nov-00	< 0.10		
1594	MC- EFS-65		04-Nov-00	16:28	04-Nov-00	< 0.10		
1595	MC- EFS-66		04-Nov-00	16:30	04-Nov-00	< 0.10		
1596	MC- EFS-67		04-Nov-00	16:29	04-Nov-00	< 0.10		
1597	MC- EFS-68		04-Nov-00	16:31	04-Nov-00	0.13		
1598	MC- EFS-69		04-Nov-00	16:32	04-Nov-00	0.39		
1599	MC- EFS-70		04-Nov-00	16:33	04-Nov-00	< 0.10		
1600	MC- EFS-71		04-Nov-00	16:35	04-Nov-00	< 0.10		
1601	MC- EFS-72		04-Nov-00	16:36	05-Nov-00	< 0.10	17-Nov-00	<0.10
1602	MC- EFS-73		04-Nov-00	16:37	05-Nov-00	< 0.10		
1603	MC- EFS-74		04-Nov-00	16:40	05-Nov-00	< 0.10		
1604	MC- EFS-75		04-Nov-00	16:27	05-Nov-00	< 0.10		
1607	MC- ESS-144		04-Nov-00	16:22	05-Nov-00	0.59		
1608	MC- ESS-145		04-Nov-00	16:25	05-Nov-00	0.35		
1610	MC- EFS-76		07-Nov-00	8:10	07-Nov-00	< 0.10		
1611	MC- ESS-146		07-Nov-00	8:50	07-Nov-00	0.12		

Samples shown in bold were collected from locations along the common boundary with KEC.

TABLE 1
SUMMARY OF DATA SHOWING CONFIRMATION OF REMEDIATION

					Field Laboratory		Fixed Laboratory	
Field Lab Sample ID	Sample ID	Sample Depth (ft bgs)	Date Collected	Time Collected	Date Analyzed	Concentration (mg/kg)	Date Analyzed	Concentration (mg/kg)
1616	MC- ESS-141		07-Nov-00	9:20	07-Nov-00	0.73		
1617	MC- EFS-77		07-Nov-00	12:30	07-Nov-00	< 0.10		
1618	MC- EFS-78		07-Nov-00	12:33	07-Nov-00	< 0.10		
1619	MC- EFS-79		07-Nov-00	12:35	07-Nov-00	< 0.10		
1620	MC- EFS-80		07-Nov-00	12:40	07-Nov-00	< 0.10		
1621	MC- EFS-81		07-Nov-00	12:45	07-Nov-00	< 0.10		
1622	MC- EFS-82		07-Nov-00	14:00	07-Nov-00	< 0.10		
1623	MC- EFS-83		07-Nov-00	14:02	07-Nov-00	< 0.10		
1626	MC- EFS-108		07-Nov-00	16:03	07-Nov-00	< 0.10	18-Nov-00	<0.11
1627	MC- EFS-109		07-Nov-00	16:02	07-Nov-00	0.43		
1628	MC- EFS-110		07-Nov-00	16:01	07-Nov-00	< 0.10		
1629	MC- EFS-111		07-Nov-00	16:01	07-Nov-00	< 0.10		
1630	MC- EFS-112		07-Nov-00	16:00	07-Nov-00	< 0.10		
1631	MC- EFS-113		07-Nov-00	15:59	07-Nov-00	0.43		
1632	MC- EFS-114		07-Nov-00	15:58	07-Nov-00	0.50		
1633	MC- EFS-115		07-Nov-00	15:57	07-Nov-00	< 0.10		
1634	MC- EFS-116		07-Nov-00	15:56	07-Nov-00	< 0.10		
1635	MC- EFS-117		07-Nov-00	15:55	07-Nov-00	< 0.10	18-Nov-00	<0.11
1636	MC- EFS-118		07-Nov-00	15:54	07-Nov-00	0.34		
1637	MC- EFS-119		07-Nov-00	15:54	07-Nov-00	< 0.10		
1638	MC- EFS-120		07-Nov-00	15:53	07-Nov-00	< 0.10		
1639	MC- EFS-121		07-Nov-00	15:52	07-Nov-00	< 0.10		
1640	MC- EFS-122		07-Nov-00	15:51	07-Nov-00	0.12		
1641	MC- EFS-123		07-Nov-00	15:50	07-Nov-00	< 0.10		
1642	MC- EFS-124		07-Nov-00	15:49	08-Nov-00	< 0.10		
1643	MC- EFS-125		07-Nov-00	15:48	08-Nov-00	< 0.10		
1644	MC- EFS-126		07-Nov-00	15:47	08-Nov-00	< 0.10		
1645	MC- EFS-127		07-Nov-00	15:47	08-Nov-00	< 0.10	18-Nov-00	<0.11
1646	MC- EFS-128		07-Nov-00	15:46	08-Nov-00	< 0.10		
1647	MC- EFS-129		07-Nov-00	15:46	08-Nov-00	< 0.10	18-Nov-00	<0.10
1648	MC- EFS-130		07-Nov-00	15:45	08-Nov-00	< 0.10		
1649	MC- EFS-131		07-Nov-00	15:44	08-Nov-00	< 0.10		
1650	MC- EFS-84		07-Nov-00	15:50	08-Nov-00	< 0.10		
1651	MC- EFS-85		07-Nov-00	15:52	08-Nov-00	< 0.10		
1652	MC- EFS-86		07-Nov-00	15:53	08-Nov-00	< 0.10		
1653	MC- EFS-87		07-Nov-00	15:54	08-Nov-00	0.11		
1654	MC- EFS-88		07-Nov-00	15:55	08-Nov-00	0.30		
1655	MC- EFS-89		07-Nov-00	15:56	08-Nov-00	< 0.10		
1656	MC- EFS-90		07-Nov-00	15:57	08-Nov-00	< 0.10	18-Nov-00	<0.11
1657	MC- EFS-91		07-Nov-00	15:58	08-Nov-00	< 0.10		
1658	MC- EFS-92		07-Nov-00	15:59	08-Nov-00	< 0.10		
1659	MC- EFS-93		07-Nov-00	16:00	08-Nov-00	< 0.10		
1660	MC- EFS-94		07-Nov-00	16:01	08-Nov-00	< 0.10		
1661	MC- EFS-95		07-Nov-00	16:02	08-Nov-00	< 0.10		
1662	MC- EFS-96		07-Nov-00	16:03	08-Nov-00	0.11		
1663	MC- EFS-97		07-Nov-00	16:04	08-Nov-00	< 0.10	18-Nov-00	<0.11
1664	MC- EFS-98		07-Nov-00	16:05	08-Nov-00	0.27		

Samples shown in bold were collected from locations along the common boundary with KEC.

TABLE 1
SUMMARY OF DATA SHOWING CONFIRMATION OF REMEDIATION

					Field Laboratory		Fixed Laboratory	
Field Lab Sample ID	Sample ID	Sample Depth (ft bgs)	Date Collected	Time Collected	Date Analyzed	Concentration (mg/kg)	Date Analyzed	Concentration (mg/kg)
1665	MC- EFS-99		07-Nov-00	16:06	08-Nov-00	0.25		
1666	MC- EFS-101		07-Nov-00	16:08	08-Nov-00	0.12		
1667	MC- EFS-102		07-Nov-00	16:09	08-Nov-00	0.65		
1668	MC- EFS-103		07-Nov-00	16:10	08-Nov-00	0.24		
1669	MC- EFS-104		07-Nov-00	16:11	08-Nov-00	< 0.10		
1670	MC- EFS-105		07-Nov-00	16:12	08-Nov-00	< 0.10		
1671	MC- EFS-106		07-Nov-00	16:13	08-Nov-00	0.12		
1672	MC- EFS-107		07-Nov-00	16:14	08-Nov-00	0.13		
1673	MC- EFS-132		14-Nov-00	11:49	14-Nov-00	< 0.10		
1674	MC- EFS-133		14-Nov-00	11:52	14-Nov-00	< 0.10		
1675	MC- EFS-134		14-Nov-00	11:54	14-Nov-00	< 0.10	30-Nov-00	<0.12
1676	MC- EFS-135		14-Nov-00	11:57	14-Nov-00	< 0.10		
1677	MC- EFS-136		14-Nov-00	11:58	14-Nov-00	< 0.10		
1678	MC- EFS-137		14-Nov-00	11:59	14-Nov-00	< 0.10		
1679	MC- EFS-138		14-Nov-00	12:01	14-Nov-00	0.20		
1680	MC- EFS-139		14-Nov-00	12:04	14-Nov-00	< 0.10		
1681	MC- EFS-140		14-Nov-00	12:05	14-Nov-00	< 0.10		
1682	MC- EFS-141		14-Nov-00	12:06	14-Nov-00	< 0.10		
1683	MC- EFS-142		14-Nov-00	12:08	14-Nov-00	< 0.10		
1684	MC- EFS-143		14-Nov-00	12:09	14-Nov-00	< 0.10		
1685	MC- EFS-144		14-Nov-00	12:12	14-Nov-00	< 0.10	30-Nov-00	<0.12
1686	MC- EFS-145		14-Nov-00	12:14	14-Nov-00	< 0.10		
1687	MC- EFS-146		14-Nov-00	12:16	14-Nov-00	< 0.10		
1688	MC- EFS-147		14-Nov-00	12:17	14-Nov-00	< 0.10	18-Nov-00	0.52
1689	MC- EFS-148		14-Nov-00	12:19	14-Nov-00	< 0.10		
1690	MC- EFS-149		14-Nov-00	12:21	14-Nov-00	< 0.10		
1691	MC- EFS-150		14-Nov-00	12:20	14-Nov-00	< 0.10		
1692	MC- EFS-151		14-Nov-00	12:54	14-Nov-00	< 0.10		
1693	MC- EFS-152		14-Nov-00	12:18	14-Nov-00	< 0.10		
1694	MC- EFS-153		14-Nov-00	12:17	14-Nov-00	< 0.10		
1695	MC- EFS-154		14-Nov-00	12:15	14-Nov-00	< 0.10		
1696	MC- EFS-155		14-Nov-00	12:20	14-Nov-00	< 0.10	30-Nov-00	<0.11
1770	MC- ESS-151		27-Nov-00	12:06	27-Nov-00	< 0.10		
1771	MC- ESS-152		27-Nov-00	12:07	27-Nov-00	0.65		
1773	MC- EFS-156		27-Nov-00	12:04	27-Nov-00	< 0.10		
1787	MC- EFS-158		28-Nov-00	14:24	28-Nov-00	< 0.10	11-Dec-00	<0.15
1788	MC- ESS-154		28-Nov-00	14:26	28-Nov-00	0.37		
1791	MC- ESS-156		28-Nov-00	15:09	28-Nov-00	0.31		
1792	MC- EFS-159		28-Nov-00	15:10	28-Nov-00	< 0.10		
1794	MC- EFS-160		29-Nov-00	12:49	29-Nov-00	< 0.10		
1811	MC- ESS-159		30-Nov-00	13:45	05-Dec-00	0.23		
1813	MC- ESS-160		30-Nov-00	15:29	05-Dec-00	0.51	11-Dec-00	<0.15
1814	MC- ESS-161		30-Nov-00	15:28	05-Dec-00	0.76		
1815	MC- EFS-161		30-Nov-00	15:25	05-Dec-00	< 0.10		
1816	MC- EFS-162		30-Nov-00	15:26	05-Dec-00	< 0.10		
1817	MC- EFS-163		30-Nov-00	15:27	05-Dec-00	< 0.10		
1818	MC- EFS-164		05-Dec-00	15:41	05-Dec-00	< 0.10	11-Dec-00	<0.11

Samples shown in bold were collected from locations along the common boundary with KEC.

TABLE 1
SUMMARY OF DATA SHOWING CONFIRMATION OF REMEDIATION

					Field Laboratory		Fixed Laboratory	
Field Lab Sample ID	Sample ID	Sample Depth (ft bgs)	Date Collected	Time Collected	Date Analyzed	Concentration (mg/kg)	Date Analyzed	Concentration (mg/kg)
1819	MC- ESS-162		05-Dec-00	15:38	05-Dec-00	0.52		
1820	MC- ESS-163		05-Dec-00	15:39	05-Dec-00	0.11		
1821	MC- ESS-164		05-Dec-00	15:40	05-Dec-00	0.55		
1835	MC- EFS-165		16-Jan-01	15:54	16-Jan-01	< 0.10		
1836	MC- EFS-166		16-Jan-01	15:52	16-Jan-01	0.31		
1837	MC- EFS-167		16-Jan-01	15:51	16-Jan-01	0.32		
1838	MC- EFS-168		16-Jan-01	15:50	16-Jan-01	0.69		
1839	MC- ESS-165		18-Jan-01	16:35	18-Jan-01	0.45		
1840	MC- ESS-166		18-Jan-01	16:40	18-Jan-01	0.48		
1476	DS- ESS-22		30-Oct-00	12:42	30-Oct-00	**9.2** [E]		
1483	DS- EFS-18		30-Oct-00	12:35	30-Oct-00	< 0.10		
1531	DS- EFS-29		01-Nov-00	14:45	01-Nov-00	0.18		
1532	DS- EFS-30		01-Nov-00	14:42	01-Nov-00	0.12		
1533	DS- EFS-27		01-Nov-00	14:40	01-Nov-00	< 0.10		
1534	DS- EFS-28		01-Nov-00	14:46	01-Nov-00	< 0.10		
1535	DS- EFS-31		01-Nov-00	14:53	01-Nov-00	< 0.10		
1536	DS- EFS-32		01-Nov-00	14:55	01-Nov-00	< 0.10		
1560	DS- EFS-38		03-Nov-00	13:00	03-Nov-00	< 0.10		
1561	DS- EFS-39		03-Nov-00	13:20	03-Nov-00	0.44		

Samples shown in bold were collected from locations along the common boundary with KEC.

DATA REVIEW
ECCS – MEDICAL CENTER

	Acceptable	Unacceptable	Control Limits Met
Holding Times	√		
Completeness	√		
LCS	√		Yes
MS/MSD	√		Yes
MS/MSD RPD	√		Yes
Blind Duplicates	√		Yes

DATA REVIEW
ECCS – DABNEY SMITH PROPERTY

	Acceptable	Unacceptable	Control Limits Met
Holding Times	√		
Completeness	√		
LCS	√		Yes
MS/MSD	√		Yes
MS/MSD RPD	√		Yes
Blind Duplicates	√		Yes

DATA REVIEW
ECCS – NEWMAN DUPLEX

	Acceptable	Unacceptable	Control Limits Met
Holding Times	√		
Completeness	√		
LCS	√		Yes
MS/MSD	√		Yes
MS/MSD RPD	√		Yes
Blind Duplicates	√		Yes

DATA REVIEW
PARADIGM ANALYTICAL LABS

	Acceptable	Unacceptable	Control Limits Met
Holding Times	√		
Completeness	√		
LCS	√		Yes
MS/MSD	√		Yes
MS/MSD RPD	√		Yes
Blind Duplicates	√		Yes

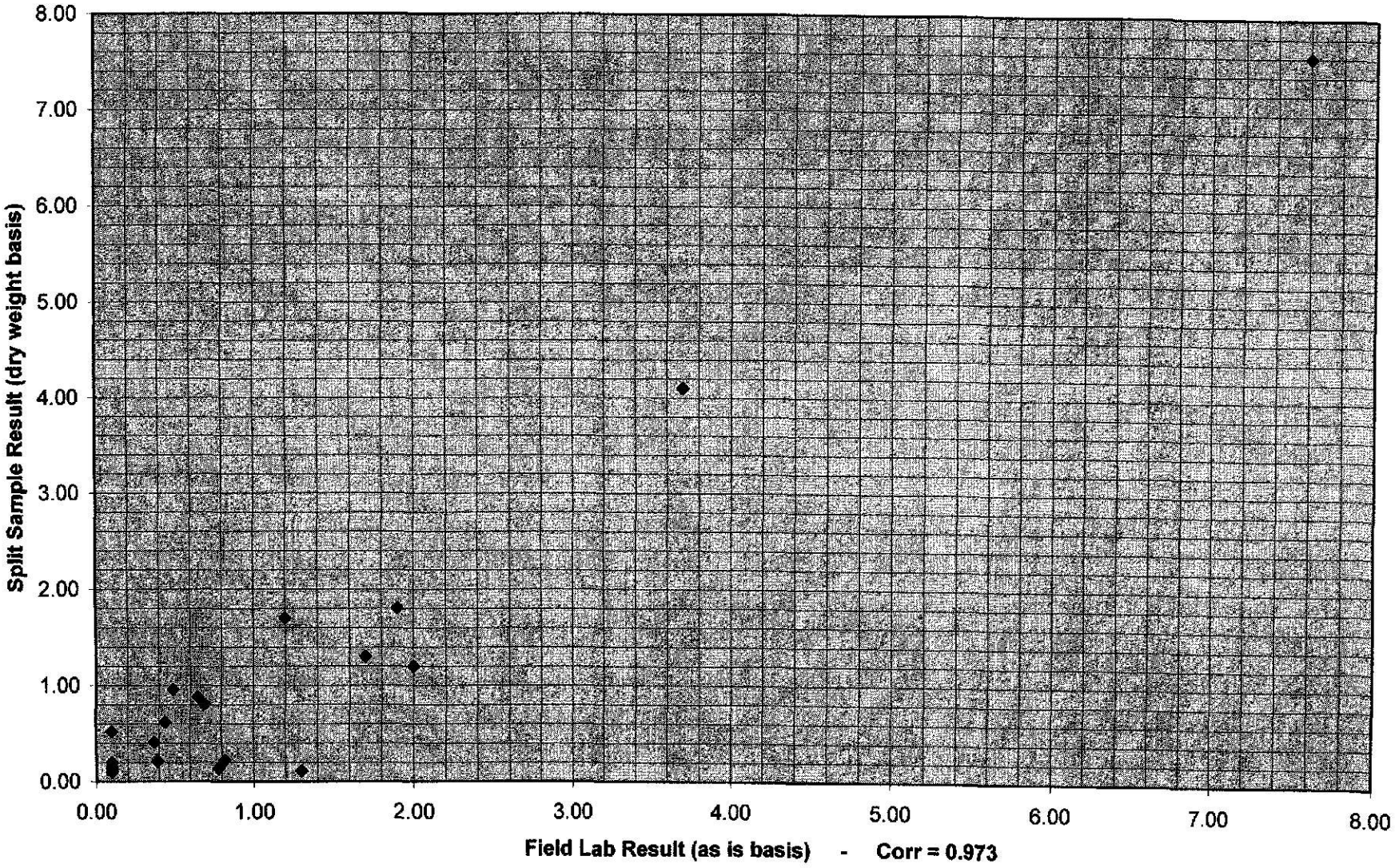
COMPARISON OF FIXED AND FIELD LABORATORY SPLIT SAMPLE DATA

Sample ID	PCBs (1260)		
	Field Lab	Fixed Lab	RPD
MCESS-62	< 0.10	0.10	0%
MCEFS-19	2.10	3.10	38%
MCESS-101	5.50	6.30	14%
DSPA-7	0.55	0.55	0%
DSESS-14	1.90	1.60	17%
DSESS-1	0.82	0.71	14%
MCESS-113	0.18	0.16	12%
MCESS-53 0.1	0.69	0.57	19%
MCESS-58 0.5	0.43	0.34	23%
DSESS-17	1.90	1.50	24%
MCESS-71 0.5	0.34	0.39	14%
MCESS-63 0.1	0.15	< 0.11	< 31%
MCESS-17 0.5	0.80	0.66	19%
MCESS-22 0.5	3.40	3.80	11%
MCESS-28 0.5	< 0.10	< 0.14	< 33%
MCESS-33 0.5	0.13	< 0.10	< 27%
MCESS-40 0.5	0.49	0.96	65%
MCESS-44 0.5	< 0.10	< 0.14	< 33%
MCESS-36 0.1	0.44	0.62	34%
MCESS-68 0.5	< 0.10	< 0.12	< 18%
MCESS-80 0.5	1.20	1.70	34%
MCESS-85 0.1	0.65	0.88	30%
MCEFS-2	0.37	0.41	10%
MCEFS-8	1.70	1.30	27%
MCEFS-11	< 0.10	< 0.12	< 18%
MCDS-2	0.69	0.80	15%
DSESS-17	1.90	1.80	5%
DSEFS-16	< 0.10	< 0.10	< 4%
MCEFS-72	< 0.10	< 0.10	0%
DSESS-36	3.70	4.10	10%
MCESS-118	2.00	1.20	50%
MCEFS-61	< 0.10	< 0.10	< 1%
MCEFS-31	< 0.10	< 0.10	< 2%
DSESS-38	7.60	7.60	0%
MCEFS-127	< 0.10	< 0.11	< 10%
MCEFS-117	< 0.10	< 0.11	< 10%
MCEFS-129	< 0.10	< 0.10	< 0%
MCEFS-108	< 0.10	< 0.11	< 10%
MCEFS-97	< 0.10	< 0.11	< 10%
MCEFS-90	< 0.10	< 0.11	< 10%
MCEFS-147	< 0.10	0.52	NC
MCEFS-134	< 0.10	< 0.12	< 18%
MCEFS-144	< 0.10	< 0.12	< 18%
MCEFS-155	1.30	< 0.11	NC
DSEFS-59	< 0.10	< 0.20	< 67%
DSEFS-61	< 0.10	< 0.20	< 67%
DSESS-53	0.39	0.21	60%
MCEFS-158	< 0.10	< 0.15	< 40%
NDESS-4	0.82	0.22	115%
MCEFS-160	< 0.10	< 0.15	< 40%
MCEFS-164	< 0.10	< 0.11	< 10%
DSESS-57	0.78	< 0.14	NC

Acceptable = RPD <40%
Unacceptable = RPD >40% or NC
NC = Not confirmed.

Reported in mg/kg

Comparison of Split Sample Results



FIELD LABORATORY BLIND DUPLICATE SAMPLE DATA

SAMPLE ID		PCBs (Aroclor 1260) FIELD LAB		
Sample	Duplicate	Sample	Duplicate	RPD
MCESS-62 .5	Dupe 10/25/00	< 0.10	<0.10	0.00%
DSPA7	Dupe 10/28/00	0.59	0.59	0.00%
MCESS-113	Dupe 10/29/00	0.18	0.24	28.57%
MCESS118	Dupe 10/31/00	2.0	1.9	5.13%
DSESS-32	Dupe 11/01/00	4.7[E]	4.7[E]	0.00%
DSESS-38	Dupe 11/02/00	7.6[E]	10[E]	27.27%
MCEFS-61	Dupe 11/03/00	<0.10	<0.10	0.00%
MCEFS-72	Dupe 11/04/00	<0.10	<0.10	0.00%
MCESS-147	Dupe 11/07/00	1	0.97	3.05%
DSESS-53	Dupe 11/27/00	0.42	0.49	15.38%
MCESS-155	Dupe 11/28/00	1.3	1.3	0.00%

E = VALUE EXCEEDS CALIBRATION RANGE.

Reported in mg/kg