BRENT STREET PROPERTIES
REMEDIATION REPORT

Kuhlman Electric Corporation
Crystal Springs, Mississippi

Prepared for

BorgWarner Inc.

April 2008

GeoEnvironmental Associates, LLC | MARTIN&SLAGLE

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Prepared by

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April 2008

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Project Manager

Christine Slagle
QA Manager

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Brent Street Properties Remediation Report
Kuhlman Electric Corporation
Crystal Springs, Mississippi

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1.0 EXECUTIVE SUMMARY

The remediation of 112/114 Brent Street, the Raymond Lamar, and 115 Brent Street properties (Brent Street Properties), was conducted between January 2007 and January 2008 in accordance with the following MDEQ and US EPA approved documents:

- *Remediation Work Plan for the MidSouth Leasing Property, 114 and 112 Brent Street, Crystal Springs, Mississippi.* November 2004.
- *Remediation Work Plan, MidSouth Lease and Sales Property, 115 Brent Street, Crystal Springs, Mississippi.* July 2005.

The remediation goals were met through a combination of:

1) Removal and disposal in a Subtitle "C" landfill of soil and debris with PCB concentrations greater than 50 ppm.
2) Removal and disposal in a Subtitle "D" landfill of soil and debris with PCB concentrations between 1.0 ppm and 50 ppm.

The Brent Street Properties are in Crystal Springs, Copiah County, MS 39059, at latitude N 31° 59' 04" and longitude W 90° 21' 48". The Brent Street Properties are located within the town limits of Crystal Springs. The town center is located approximately 0.3 miles northeast of the subject property. The 112, 114 and 115 Brent Street properties are owned by MidSouth Lease and Sales, Inc. The 114 Brent Street property contains a single-story house with slab on-grade foundation, the 112 Brent Street property contains a mobile home, and the 115 Brent Street property contains a single-story frame house situated on a concrete block pier foundation. The Raymond Lamar Sr. property located south of 114 Brent Street is undeveloped.

During the course of performing grading work for KEC and adjacent properties, David Rodgers, owner of L. M. & R. Services, Inc., transported and deposited certain materials

on the Brent Street Properties. Material deposited included demolition debris consisting of soil, concrete, and rebar removed from the KEC plant, as well as debris from the post-fire cleanup of the ice house formerly located on Fulgham Avenue north of the KEC plant. Debris from the ice house property included bricks, wood, and soil. In addition to the ice house debris, David Rodgers also confirmed that L. M. & R. Service, Inc. transported sawdust from the Gem Plant (Sheldon Laboratory Systems), a furniture manufacturer in Crystal Springs, and deposited the material on the 112 and 114 Brent Street properties. David Rodgers owned the 112, 114, and 115 Brent Street properties until they were sold to MidSouth in December 2000. Following that sale, MidSouth built a new one-story, single family house on the 114 Brent Street property and relocated a house from elsewhere onto the 115 Brent Street property.

In accordance with Mississippi Department of Environmental Quality (MDEQ) requirements, detailed investigation assessments were conducted for the Brent Street Properties. Results indicated that the contaminant of concern (CoC) was polychlorinated biphenyl ("PCB"), and specifically PCB Aroclor1260. The areas with PCB concentrations above 1.0 ppm were horizontally and vertically delineated. Impacted soil and debris were excavated and disposed of at regulated disposal facilities. Results of confirmation soil samples collected following removal of impacted soil and debris indicate that PCBs have been effectively removed to concentrations below the Remedial Goal (RG) of 1.0 ppm. Excavated areas where test results confirmed that the RG was met were backfilled with clean clay-gravel soil and the sites returned to their original condition.

2.0 INTRODUCTION

2.1 Background

Kuhlman Electric Corporation (KEC) owns and operates a transformer manufacturing plant in Crystal Springs, Mississippi (Figure 1). The KEC plant in Crystal Springs, Mississippi, was constructed and has been owned and operated as a transformer manufacturing plant since the 1950s. On April 19, 2000, BorgWarner received notification from KEC, in accordance with the purchase agreement, that areas of contaminated soil had been found at the plant site. Environmental assessments conducted at the KEC Plant site indicated the presence of soil contaminated with polychlorinated biphenyl (Aroclor 1260) and various chlorinated benzenes.

MidSouth Lease & Sales (MidSouth) of Crystal Springs, Mississippi, currently owns the 112, 114, and 115 Brent Street properties. As a result of the placement of PCB-containing soil on these properties, on May 22, 2003, the Mississippi Department of Environmental Quality (MDEQ) issued an order to David Rodgers and KEC to assess and remediate the resultant PCB contamination. After obtaining information from David Rodgers, BorgWarner, on behalf of KEC, conducted a site assessment at the 112 and 114 Brent Street properties. During the assessment of the horizontal and vertical extent of PCB-impacted soil at the 112 and 114 Brent Street properties, it was discovered that Mr. David Rogers had encroached onto the Raymond Lamar Sr. property (the "Lamar Property") located immediately south of 114 Brent Street by placing PCB-containing soil on a small portion of the Lamar property and along a drainage ditch that runs through the property.

During the assessment of 112/114 Brent Street and the Lamar property at the request of MidSouth, surface soil samples were collected on the 115 Brent Street property and analyzed for the presence of PCBs. The 115 Brent Street property was also previously

owned by Mr. David Rodgers. Based on the analytical results, the 115 Brent Street property was determined to be impacted by PCBs.

On September 27, 2004, MDEQ issued an order to David Rodgers and KEC to assess and remediate the resultant PCB contamination at the 115 Brent Street property. BorgWarner, on behalf of KEC, conducted a site assessment and found that the 115 Brent Street property was impacted by PCBs.

During the course of performing grading work for KEC and adjacent properties, David Rodgers, who is the owner of L. M. & R. Services, Inc., transported and deposited certain materials on the Brent Street Properties. Material deposited by Mr. Rodgers on the Brent Street properties included demolition debris consisting of soil, concrete, rebar removed from the KEC plant, as well as debris from the post-fire cleanup of the ice house formerly located on Fulgham Avenue north of the KEC plant. Debris from the ice house property included bricks, wood, and soil. In addition to the ice house debris, David Rodgers also confirmed that L. M. & R. Service, Inc. transported sawdust from the Gem Plant (Sheldon Laboratory Systems), a furniture manufacturer in Crystal Springs, and deposited the material on the 112 and 114 Brent Street properties. David Rodgers owned the 112, 114, and 115 Brent Street properties until they were sold to MidSouth in December 2000. Following the sale, MidSouth built a new one-story, single family house on 114 Brent Street and relocated a house from elsewhere onto the 115 Brent Street property.

2.2 Site Description

The MidSouth properties (112, 114 and 115 Brent Street) and the Raymond Lamar Sr. property are located in Crystal Springs, Copiah County, Mississippi 39059, at latitude N 31° 59' 04" and longitude W 90° 21' 48". The Brent Street Properties are located within the town limits of Crystal Springs. The town center is located approximately 0.3 miles northeast of the subject property. The 114 Brent Street property contains a single-story house with slab on-grade foundation, the 112 Brent Street property contains a mobile

home, and the 115 Brent Street property contains a single-story frame house situated on a concrete block pier foundation. The Raymond Lamar Sr. property located south of 114 Brent Street is undeveloped.

After preliminary investigations, areas of the Brent Street Properties that had PCB concentrations exceeding the MDEQ maximum allowable limit of 1 mg/Kg were covered with an impervious low-density polyethylene liner to prevent potential contact with impacted soils and to eliminate potential off-site transport of PCB-containing soils through wind erosion and stormwater runoff.

An area with trees and vegetative undergrowth is situated in the northeast corner of the 115 Brent Street property. The three Brent Street Properties slope south and southwest toward Turkey Creek, which drains west along the Lamar property's south boundary. The stormwater runoff from these Brent Street and Lamar properties flows to the south and southwest.

The properties are bordered to the east, north and west by single-family houses, and to the south by undeveloped woodland. The predominant land use in the surrounding area is residential.

2.3 Previous Investigations

From March 2004 through May 2005, detailed assessments of the MidSouth properties at 112, 114 and 115 Brent Street and the Lamar property were conducted to determine the horizontal and vertical extent of PCB-impacted soil. Work plans and investigation results are included in the following documents, which were submitted to and approved by MDEQ.

- *Site Characterization Plan, MidSouth Leasing Property, 112 and 114 Brent Street, Crystal Springs, Mississippi.* December 2003.

- *Site Characterization Assessment Report, MidSouth Leasing Property, Crystal Springs, Mississippi.* July 2004.
- *Site Characterization Work Plan, MidSouth Leasing Property, 115 Brent Street,* May 11, 2005.
- *Site Characterization Report, MidSouth Lease and Sales Property,115 Brent Street,* May 2005.

2.4 Remediation Objectives and Rationale

The remedial activities performed for the 112, 114 and 115 Brent Street and Lamar Properties were conducted in accordance with the following work plans approved by MDEQ and US EPA.

- *Interim Corrective Action Plan, Brent Street Property, Crystal Springs, Mississippi.* June 2003.
- *Remediation Work Plan for the MidSouth Leasing Property, 114 and 112 Brent Street, Crystal Springs, Mississippi.* November 2004.
- *Remediation Work Plan, MidSouth Lease and Sales Property, 115 Brent Street, Crystal Springs, Mississippi.* July 2005.

The Remedial Goal (RG) established by MDEQ for unrestricted properties is 1.0 mg/kg. This RG is deemed protective of human health and the environment for unrestricted site use according to *Subpart II, Mississippi Department of Environmental Quality, Risk Evaluation Procedures for Voluntary Cleanup and Redevelopment of Brownfield Sites* (1999), as amended February 28, 2002.

The general objective for remediation of these properties was to conduct active remediation by removal and proper disposal of impacted materials with concentrations of PCBs in excess of 1.0 mg/kg, and to restore the properties to their original condition. The Brent Street remediation area is shown on Figure 2.

3.0 REMEDIATION ACTIVITIES

The remediation of the Brent Street Properties was conducted in accordance with the planning documents as approved by US EPA and MDEQ.

The contaminant of concern (CoC) identified during the investigation phase was PCB (Aroclor 1260). The RG for PCB was established by MDEQ as 1.0 ppm.

The RG was met through a combination of:

1) Removal and disposal in a Subtitle "C" landfill of soil and debris with PCB concentrations greater than or equal to 50 ppm.
2) Removal and disposal in a Subtitle "D" landfill of soil and debris with PCB concentrations above 1.0 ppm and below 50 ppm.

3.1 Excavation and Disposal

Remediation of the Brent Street Properties occurred between January 2007 and January 2008. Prior to removing any soil, the houses at 114 and 115 Brent Street were moved from their foundations and temporarily stored on MidSouth property outside the work zone. House foundation materials were loaded into roll-off boxes and disposed.

A confirmation sampling grid was determined for each property based on guidance adopted for this project by MDEQ. Refer to Section 4 for details of the confirmation sampling procedure.

Areas to be remediated were delineated during the assessment phase according to whether soil PCB concentrations were greater than or equal to 50 ppm or were less than

50 ppm. Soil and debris with concentrations greater than or equal to 50 ppm were transported to the Waste Management Subtitle "C" landfill at Emelle, Alabama for disposal. Soil and debris with PCB concentrations less than 50 ppm were transported to BFI's "Little Dixie", Subtitle "D" landfill in Madison County, Mississippi.

Excavation and segregation of soil for disposal were based on laboratory results of PCB concentrations in site soils. This information is presented in the site characterization reports referenced in Section 2.3. The horizontal and vertical delineations of PCB soil concentrations are presented in the remediation work plans referenced in Section 2.4. As an additional measure, when roll-off boxes were filled from areas with PCB concentrations determined during assessment to be less than 50 ppm, a five-point composite soil sample was collected from each roll-off box and analyzed to confirm that the PCB concentration was less than 50 ppm, which is the criteria for disposal at BFI's "Little Dixie", Subtitle "D" landfill.

3.1.1 Impacted Soil

Impacted soil and debris were excavated using a trackhoe and/or a "mini"-hoe, and loaded into plastic lined roll-off boxes. The actual surveyed boundaries of excavation zones, post-excavation confirmation sample locations and results are depicted in Figures 3, 4, and 5.

Initial excavation depths were projected from vertical sampling data. Soils were sampled and analyzed at increasing depth until PCB results were less than 1 ppm. The excavation depth was initially set at this depth. Vertical sampling data are shown on the PCB delineation maps included in the remediation work plans referenced in Section 2.4.

Soil samples were collected from the base of the each excavation. If confirmation sample results indicated PCB concentrations greater than the RG, the area beneath the sample

was excavated an additional one foot in depth and laterally at least one-half the grid width in all directions from the sample point. Following additional soil removal, a confirmation sample was collected and analyzed for PCBs.

In areas where soils were destined for the Subtitle '"C" landfill, this process was carried out until the RG was met. All soils removed from these areas were considered to have concentrations in excess of 50 ppm and were disposed of at the Subtitle "C" landfill. The final excavation depth was determined by confirmation sampling.

Areas greater than 1.0 ppm and greater than or equal to 50 ppm are delineated on figures included in the remediation plans referenced in Section 2.4. Soils within the 1.0 ppm contour but outside of the 50 ppm contour were loaded into roll-off boxes, and disposed of at the Subtitle "D" landfill, at "Little Dixie" Landfill in Madison County, MS. Only roll-off boxes containing soils with concentrations of less than 50 ppm based on analysis of composite samples collected from each roll-off box were transported to "Little Dixie" Landfill. Soils located within the 50 ppm contours were loaded into roll-off boxes and transported to the Subtitle "C" landfill at Emelle, Alabama for disposal. Disposal manifests are kept on file at the KEC plant.

Confirmation soil sample results indicate that PCBs have been removed to concentrations below the RG of 1.0 ppm. Table 1 shows all post-excavation soil samples collected with associated analytical results for the MidSouth Lease and Sales, Inc. Property at 112 and 114 Brent Street. Table 2 shows all post-excavation soil samples collected with associated analytical results for the MidSouth Lease and Sales, Inc. Property at 115 Brent Street. Table 3 shows all post-excavation soil samples collected with associated analytical results for the Lamar Property.

3.1.2 Water Disposal

Water generated during decontamination activities and root washing, and stormwater collected after rainfall events was accumulated in frac tanks to settle sediment from suspension and await treatment. When the frac tanks were full, water was passed through a treatment system consisting of:

1. In-line filter equipped with 1/64 inch basket strainer to remove large particles;
2. In-line 5.0 micron filter and in-line 0.5 micron filter for removal of fines;
3. In-line flow meter to monitor flow and aid in regulation to a maximum of 10 gallons per minute flow rate; and
4. Two Calgon Carbon Corporation DISPOSORB™ (55-gallon) units loaded with 165 pounds of activated carbon per unit.

A sample port was installed on each unit to periodically sample effluent for analysis to monitor treatment efficiency.

Water was flocculated in the frac tank using a polymer and allowing it to settle to the bottom of the frac tank, thereby reducing the sediment load and minimizing clogging of the filters. Water was then decanted and discharged through the treatment system into a clean frac tank. Water samples were collected downstream of the carbon filters and analyzed for PCBs. The concentration of PCBs in the effluent was reduced to less than 0.5 µg/l, and the effluent then was disposed of at a NPDES-permitted wastewater treatment facility, IWS, Inc. located at 1980 Avenue A, Mobile, Alabama. IWS, Inc.'s discharge limit for PCB in water is 3 µg/l. Disposal manifests are kept on file at the KEC plant. Treated water was discharged to the POTW under a discharge permit issued by the City of Crystal Springs, MS. Soil that settled to the bottom of the frac tanks was removed, placed into roll-off boxes and disposed of at the appropriate landfill facility based on analytical results.

3.2 Backfilling

Excavated areas where test results confirmed that the RG was met were backfilled with clean clay-gravel soil. The backfill was compacted in place and covered with 6 inches of topsoil where grass was specified as the final cover. After backfilling and finished grading was completed, the houses at 114 and 115 Brent Street were moved back to their original locations by MidSouth Lease and Sales, Inc.. Street drainage along Brent Street was repaired and the entire street was repaved.

Off-site borrow pits were used as a source for backfill material. Borrow pit samples were sent to an independent laboratory and analyzed for volatile organic compounds, semi-volatile organic compounds, metals, and PCBs prior to their approval for use. A minimum of 10% of the truckloads of soil brought as backfill to the site were sampled and the samples were sent to the on-site laboratory for analysis.

4.0 CONFIRMATION SAMPLING PROGRAM

Following excavation, all excavated areas were sampled to confirm that impacted soil with concentrations of PCBs above the Remedial Goal (RG) was removed. The sampling program 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 MDEQ for use on projects of this nature, and approved as an acceptable method by USEPA in its approval letter dated December 12, 2001.

The guidance document provided a statistically-based procedure for establishing a soil-sampling grid for confirmation that the RG was met or exceeded. The procedure used applies to "medium sites" with a surface area between 0.25 acres and 3.0 acres. The grid spacing was determined by the following equation:

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

where: A = area to be gridded (ft^2)
GI = grid interval
π = 3.14159

The three Brent Street Properties were considered a single remediation area. However, the sampling grid was determined based on the area of the middle-sized property (115 Brent Street) which yielded a conservative spacing size for this project. Based on a remediation area for 115 Brent Street of 11,000 ft^2 , the sampling grid spacing was determined to be 14.8 feet. A conservative average spacing of 15 feet was used to confirm that the RG was met for all of the Brent Street Properties. The 15-foot grid spacing was applied to the entire excavation area. The grid was adjusted to include some sidewall samples as suggested by the guidance.

The conservative option for sampling nodes was used, whereby grab samples were collected at all nodes of the grid that were laid out within the remediated area of the site, instead of sampling a random subset of samples. When a grab sample concentration exceeded the cleanup criterion, excavation continued to a depth of at least 1 foot below the node and laterally to a distance of one-half the grid spacing in all directions from the node. Only the re-excavated area was re-sampled if the initial result exceeded the RG. Excavation continued until the resample results were below the RG. In all cases, the final sample results confirmed that impacted soil was removed to PCB concentrations of less than 1.0 ppm. Most results were below detection limits. Statistical evaluation of the post-excavation results was not conducted since 100% of all sample results were below the RG as established for the Brent Street Properties.

All samples were collected in accordance with EPA Region IV Environmental Investigation Standard Operating Procedure Quality Assurance Manual (EISOPQAM). The Analytical Programs and Quality Assurance/Quality Control report is included in Section 5.0. Sample locations and remediation limits are shown on Figures 2, 3, 4 and 5, and are referenced to the Mississippi State Plane Coordinate System (horizontally) and the North American Vertical Datum - 1988 (vertically).

5.0 ANALYTICAL PROGRAMS AND QUALITY ASSURANCE / QUALITY CONTROL

As established by MDEQ guidelines, all work related to the confirmation of remedial actions at the Brent Street Properties were performed in accordance with the *US EPA Region IV "Environmental Investigations, Standard Operating Procedures and Quality Assurance Manual", May 1996 (EISOPQAM).* Copies of relevant and applicable portions of the EISOPQAM were maintained on site during all field activities and all field personnel were trained in its implementation.

5.1 Remediation Confirmation Sampling Objectives

The soil-sampling objective for the remedial work was to confirm the effectiveness of the remediation based on the sampling frequency set forth in Section 4 of this report. Samples were collected from the excavation floor and sidewalls to confirm that no soil remained in place that exceeds the established remediation goal.

5.2 Analytical Methods

Samples were analyzed for PCBs by the on-site laboratory, Environmental Chemistry Consulting Services (ECCS) of Madison, Wisconsin. At least 10% of all samples were split and sent to an off-site laboratory, SGS Paradigm Analytical Services, Inc., in Wilmington, North Carolina, for analysis of the same parameters analyzed by the on-site laboratory. This action was taken to corroborate the results of on-site laboratory analyses. The on-site laboratory analyzed the soil samples for PCBs using a mini-extraction procedure based on EPA Method 8082/8141. The procedure incorporates all the quality control rigors of the full 8082 method, including quantitation based on 6-point calibration with continuing calibration verification, surrogate method performance monitoring, method blanks, laboratory control samples (LCS), and matrix spike/matrix

spike duplicate samples. On-site laboratory analytical reports with data sheets and chain-of-custody forms are included in Appendix 1.

The off-site laboratory analyzed all soil samples for PCBs using EPA method 8082. Off-site laboratory analytical reports with data sheets and chain-of custody forms are included in Appendix 1.

5.3 Key Personnel

The following is the list of key personnel dedicated to this project:

Project Manager: Robert Martin, L.G., Martin & Slagle GeoEnvironmental Associates, LLC.

Duties: Responsible for overall management of project including all field coordination efforts.

Field Manager: Charles Peel, P.G., Peel Consulting, PLLC.

Duties: Field coordination efforts and oversight of remedial activities. Collection of samples. Maintenance of all field logs and records.

On-Site Laboratory

Manager: Richard Johnson, ECCS

Duties: Responsible for accepting custody of samples from the field personnel. Maintenance of laboratory records. Analyze samples.

QA/QC

Coordinator: Christine Slagle, Martin & Slagle GeoEnvironmental Associate, LLC.

Duties: Review daily sample logs. Confirm that QC samples are collected and sampling protocols are met. Assure that data quality objectives are met.

5.4 Quality Assurance Objectives for Data

The data quality objectives were pre-defined for the ECCS data; MDEQ considers all on-site laboratory data as screening level data. ECCS used the same equipment and methodology as the off-site laboratory, with the exception of the mini-extraction modification. At least 10% of the samples collected were split and submitted to SGS Paradigm for confirmation analysis. Following this procedure, the data qualified as screening data with definitive confirmation under US EPA Region IV EISOPQAM guidelines.

Samples designated for further analysis by SGS Paradigm were thoroughly homogenized by the field geologist. The samples were then delivered to the on-site laboratory, where ECCS personnel took their aliquot for analysis. Due to the limited sample volume required by the ECCS mini-extraction and the low volatility of the contaminants of concern, the jar was resealed, refrigerated, and the same container was sent to SGS Paradigm for analysis. Thus, SGS Paradigm analyzed the exact same sample as ECCS.

Equipment rinsates were collected, preserved and analyzed to evaluate the potential for cross-contamination. Field blanks were collected to evaluate the potential of impact to sample integrity from ambient conditions within the sampling zone.

Blind duplicate soil samples were collected for analysis and sent to both the on-site and off-site laboratories. Blind duplicates were generated by homogenizing an aliquot of sample in a disposable plastic container and splitting the homogenized sample into two containers. After ECCS retained its aliquot, the remainder was sent to SGS Paradigm for analysis.

5.5 Sample Control and Field Records

5.5.1 Sample Identification

Each sample was assigned a unique alphanumeric identifier that was clearly recognizable by both laboratories. Sample labels conformed to the labeling requirements under section 3.2.1 of the EISOPQAM.

5.5.2 Chain of Custody Procedures

At the time of collection, the field geologist recorded in the field logbook the sample ID, date, and time. Samples were placed in a cooler and transferred by the field geologist to the on-site laboratory. Upon arrival at the on-site lab, the samples were transferred to the ECCS laboratory manager who logged each sample on ECCS chain of custody forms. Each sample was assigned a unique ECCS internal ID for tracking purposes. After analysis, the samples were transferred to a sample refrigerator in the on-site lab until they were either sent to Paradigm for confirmation analysis or disposed of.

For samples sent to Paradigm, the field geologist completed a new chain of custody form for the sample transfer.

5.5.3 Field Records

Field records were kept in accordance with procedures specified in section 3.5 of EISOPQAM.

5.6 Laboratory QA/QC

QA/QC for both laboratories is identical. Summaries of procedures for each laboratory follow.

ECCS:

- Continuing calibration standards analyzed every ten samples or fewer, and at the end of a run.
- Blank and LCS samples analyzed every twenty samples or fewer, with a minimum of one per day.
- MS/MSD (matrix spike and matrix spike duplicate) samples analyzed every twenty samples or fewer, with a minimum of one per day.

Paradigm:

- Continuing calibration standards analyzed at least once every 12-hour shift, plus a minimum of every 20 samples (GC/MS criteria follow method specific tuning requirements per EPA 8270).
- Blank and LCS samples analyzed every twenty samples or fewer, with a minimum of one per day.
- MS/MSD samples analyzed every twenty samples or fewer, with a minimum of one per day.

5.7 Data Review and Validation

All laboratory reports were reviewed for reporting accuracy and consistency with both laboratory QA/QC protocols. The primary validation of the on-site lab data was accomplished through comparison with the data from SGS Paradigm. The relative percent difference (RPD) between the laboratories' results for split samples was calculated and compared to a 100% RPD acceptability threshold. The data review report is included in Appendix 2.

6.0 SOIL AND WASTE DISPOSAL

Approximately 755 roll-off boxes containing soil, concrete, rebar, dust, bricks, wood, and sawdust were disposed of at regulated, off-site facilities. Of this total, 402 roll-off boxes of impacted media with PCB concentrations greater than or equal to 50 ppm were disposed of at the Waste Management Subtitle "C" landfill at Emelle, Alabama. A total of 353 roll-off boxes of impacted media with PCB concentrations less than 50 ppm were disposed of at the BFI's Subtitle "D" landfill in Madison, County, Mississippi. As an extra measure, each roll-off box that was sent to the Subtitle "D" landfill was sampled prior to transportation to confirm that the soil PCB concentration was less than 50 ppm. A five-point composite sample was collected from each roll-off box and analyzed for PCBs. PCB concentrations for all roll-off boxes transported to the Subtitle "D" landfill were below 50 ppm.

All investigative-derived waste (IDW), including disposable personal protective equipment, soil removed from equipment during decontamination, plastic sheeting, and contaminated debris from the site, was placed in roll-off boxes for disposal. IDW was segregated for disposal by the area in which the waste was generated. For example, IDW generated in an area where soil was destined for the Subtitle "C" facility was placed in roll-off boxes that were transported to the Emelle, Alabama facility.

Copies of waste disposal manifests are kept on file at the KEC plant site.

7.0 SUMMARY AND CONCLUSIONS

The remediation of the Brent Street Properties was conducted between January 2007 and January 2008 in accordance with the following MDEQ and US EPA approved documents:

- *Remediation Work Plan for the MidSouth Leasing Property, 114 and 112 Brent Street, Crystal Springs, Mississippi.* November 2004.
- *Remediation Work Plan, MidSouth Lease and Sales Property, 115 Brent Street, Crystal Springs, Mississippi.* July 2005.

The remediation goals were met through a combination of:

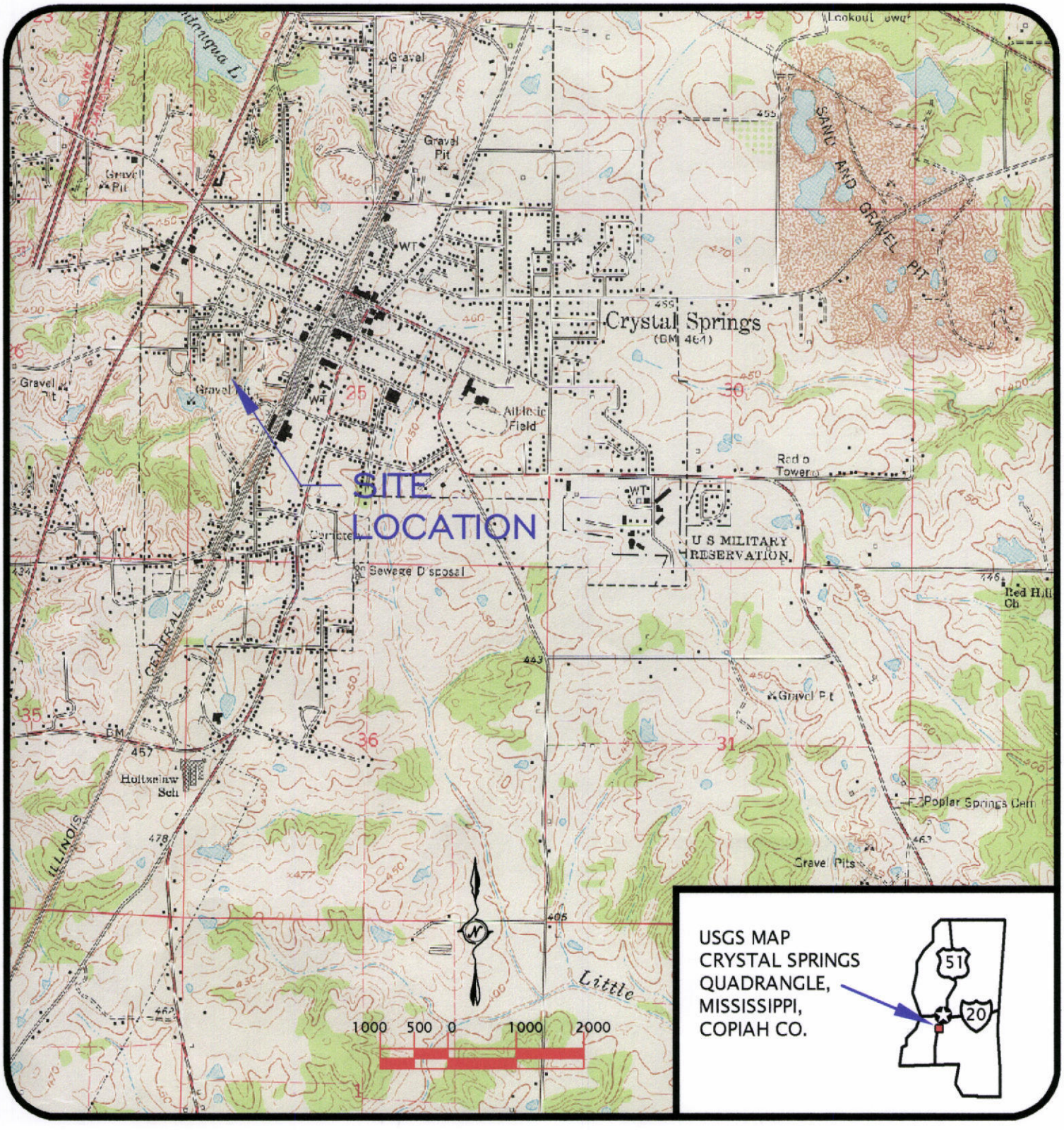
1) Removal and disposal in a Subtitle "C" landfill of soil and debris with PCB concentrations greater than or equal to 50 ppm.
2) Removal and disposal in a Subtitle "D" landfill of soil and debris with PCB concentrations above 1.0 ppm and below 50 ppm.

Detailed investigation assessments were conducted for the Brent Street Properties. Results indicated that the contaminant of concern (CoC) was PCB (Aroclor1260). The PCB-impacted areas with concentrations greater than 1.0 ppm were horizontally and vertically delineated.

Prior to the remediation, the two houses on 114 and 115 Brent Street were temporarily moved from each respective property, and impacted media were excavated and disposed of at regulated disposal landfills. Results of confirmation soil samples collected following removal of impacted soil and debris indicate that PCBs have been effectively removed to concentrations well below the RG of 1.0 ppm.

Excavated areas where test results confirmed that the RG was met were backfilled with clean clay-gravel soil. The backfill was compacted in place and covered with 6 inches of topsoil where grass was specified as the final cover. After backfilling and finished grading was completed, the houses at 114 and 115 Brent Street were moved back to their original locations by MidSouth Lease and Sales, Inc. Street drainage along Brent Street was repaired and the entire street was repaved.

Off-site borrow pits were used as a source for backfill material. Borrow pit samples were sent to an independent laboratory and analyzed for volatile organic compounds, semi-volatile organic compounds, metals, and PCBs prior to their approval for use. A minimum of 10% of the truckloads of soil brought as backfill to the site were sampled and the samples were sent to the on-site laboratory for analysis.



MARTIN&SLAGLE

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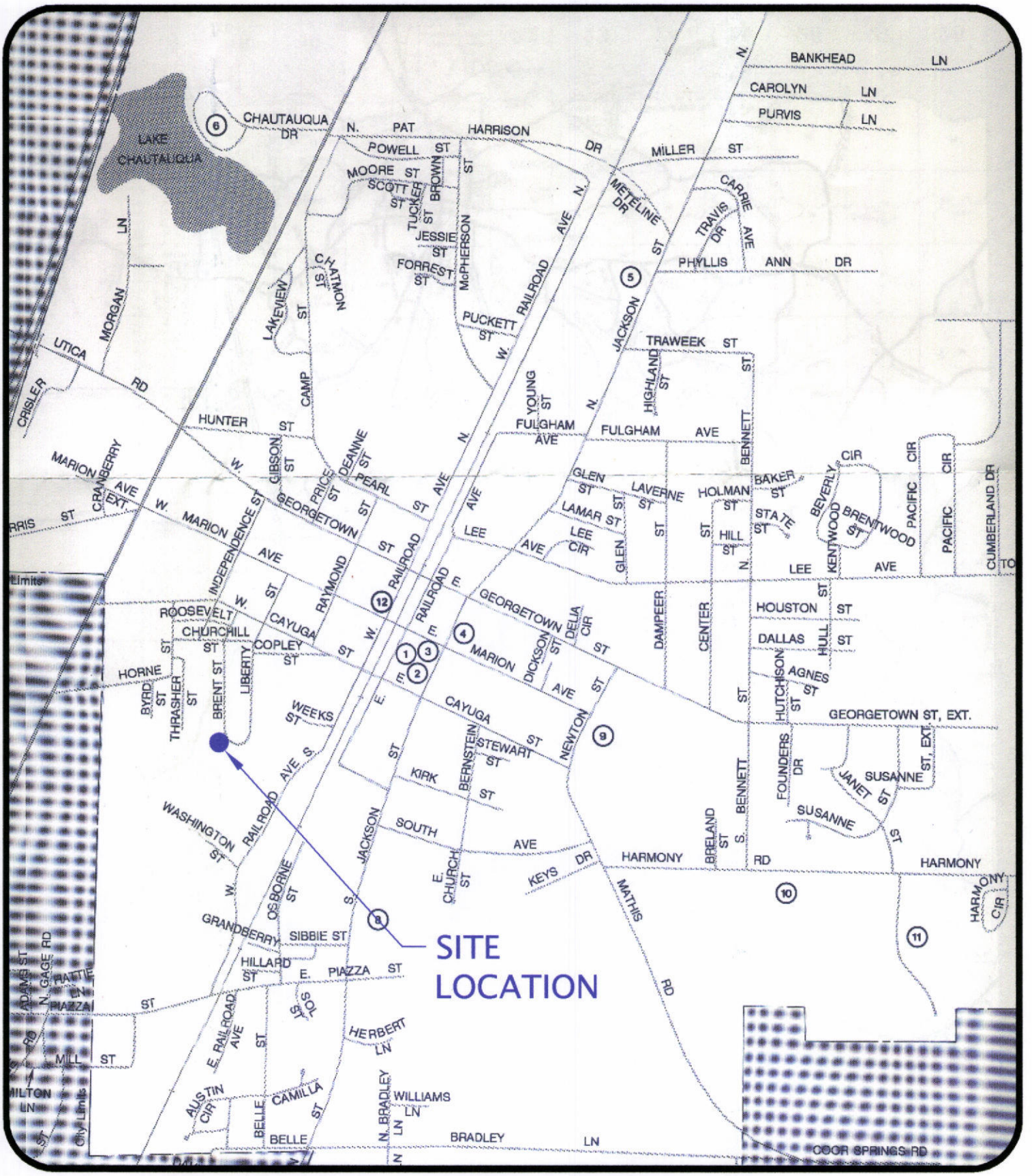
PREPARED FOR:
BorgWarner Inc.

FIGURE 1

SCALE = 1":2000'
REV: 0
DATE: 4/14/08
DR: DGR
CHK: RLM

PCB REMEDIATION SITE LOCATION MAP

BRENT STREET PROPERTIES
CRYSTAL SPRINGS, MS



MARTIN&SLAGLE GeoEnvironmental Associates, LLC PO Box 1023 Black Mountain NC 28711 828.669.3929 828.669.5289	PREPARED FOR: **BorgWarner Inc.**	NTS REV: 0 DATE: 4/14/08 DR: DGR CHK: RLM	PCB REMEDIATION SITE VICINITY MAP BRENT STREET PROPERTIES CRYSTAL SPRINGS, MS
	FIGURE 2		

3 FIGURE

PCB REMEDIATION CONFIRMATION SAMPLE LOCATION MAP

BRENT STREET PROPERTIES
CRYSTAL SPRINGS, MS

PREPARED FOR: **BorgWarner Inc.**

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PEEL CONSULTING, PLLC
MADISON, MISSISSIPPI

REVISIONS		
#	REVISION NOTES	
1		
2		
3		

SCALE 1"=10'
DR.: DGR
CHK: RLM/CP
REV: 0
DATE: 04/14/08
PATH NAME: MSL CAD\CLOSURE.DWG

3
4
5

LEGEND

MS1 112 & 114 BRENT STREET
MS2 115 BRENT STREET
RLP RAYMOND LAMAR PROPERTY
EFS EXAVATION FLOOR SAMPLE
ESS EXCAVATION SIDEWALL SAMPLE

- SURVEY CONTROL POINT
- OVERHEAD POWER
- UTILITY POLE
- AREA LIGHT
- WATER METER
- LOT LINE
- ROAD
- PROPERTY LINE
- FENCE
- LIMIT OF EXCAVATION
- DITCHLINE

SAMPLE POINT

MS0-XXX-000
0.00 0000 000.00

① SAMPLE LOCATION NUMBER
② SAMPLE LOCATION
③ PCB IN mg/kg
④ SURVEY NUMBER
⑤ ELEVATION

MAP SOURCE: Crowder Engineering & Surveying, Inc.

A

B

MS2-ESS-026 <0.10 7426 421.57
MS2-ESS-004-001 <0.10 7419 426.03
<0.10 7387 426.13
RLP-ESS-008 <0.10 7258 419.16
RLP-EFS-007-001 <0.10 7254 419.24
RLP-ESS-012 <0.10 7287 420.32
RLP-EFS-011-001 <0.10 7262 419.45
MS2-ESS-025 <0.10 7424 422.79
MS2-ESS-024 <0.10 7420 424.88
MS2-ESS-023 <0.10 7409 425.67
RLP-ESS-006 0.72 7249 423.72
RLP-ESS-009 <0.10 7259 419
RLP-EFS-013-001 <0.10 7264 418.78
RLP-EFS-012-001 <0.10 7263 418.63
RLP-EFS-006-001 <0.10 7243 423.13
RLP-ESS-001 <0.10 7244 420.53
RLP-EFS-005-001 <0.10 7242 423.15
RLP-EFS-003-001 <0.10 7240 421.38
RLP-ESS-011 <0.10 7266 419.13
RLP-EFS-014-001 <0.10 7265 418.73
RLP-ESS-010 <0.10 7260 418.91
RLP-EFS-004-001 <0.10 7241 421.63
RLP-ESS-005 <0.10 7248 423.38
RLP-EFS-002-001 <0.10 7239 419.90
RLP-ESS-002 0.02 7245 418.68
RLP-EFS-001-001 <0.10 7238 418.73
RLP-ESS-004 <0.10 7247 420.12
RLP-ESS-003 0.37 7246 418.87
RLP-ESS-015 0.61 7276 415.84
RLP-EFS-015-001 0.12 7268 415.12
RLP-EFS-016-001 <0.10 7269 415.84
RLP-ESS-016 <0.10 7277 417.08
RLP-ESS-014 <0.10 7275 416.25
RLP-EFS-018-001 <0.10 7271 415.26
RLP-EFS-017-001 <0.10 7270 415.54
RLP-ESS-017 <0.10 7278 416.15
RLP-EFS-019-001 0.17 7272 415.08
RLP-ESS-013 <0.10 7274 416.34
RLP-EFS-020-001 <0.10 7273 415.48
RLP-ESS-022 <0.10 7289 416.24
RLP-ESS-020 <0.10 7285 416.39
RLP-EFS-021-001 <0.10 7279 414.81
RLP-EFS-022-001 0.13 7280 415.09
RLP-ESS-018 0.24 7283 414.99
RLP-EFS-026-001 0.32 7288 415.29
RLP-EFS-023-001 <0.10 7281 415.37
RLP-ESS-023 <0.10 7290 416.49
RLP-ESS-019 <0.10 7284 415.30
RLP-EFS-025-001 <0.10 7287 414.71
RLP-EFS-024-001 <0.10 7282 414.34
RLP-ESS-021 <0.10 7286 414.69

REVISIONS		
#	REVISION NOTES	
1		
2		
3		

SCALE 1"=10'
DR: DGR
CHK: RLM/CP
REV: 0
DATE: 04/14/08
PATH NAME: MSL CAD\CLOSURE.DWG

GeoEnvironmental Associates LLC
MARTIN & SLAGLE
PO Box 1023
Black Mountain NC 28711
828.669.3929 828.669.5289

PEEL CONSULTING, PLLC
MADISON, MISSISSIPPI

PREPARED FOR:
BorgWarner Inc.

PCB REMEDIATION CONFIRMATION SAMPLE LOCATION MAP

BRENT STREET PROPERTIES
CRYSTAL SPRINGS, MS

4 FIGURE

LEGEND

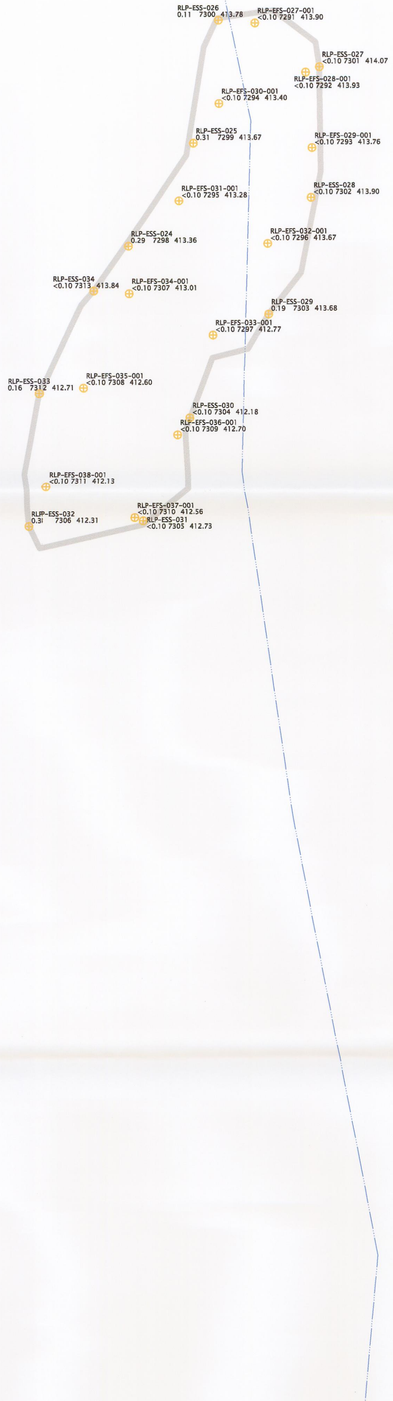
MS1 112 & 114 BRENT STREET
MS2 115 BRENT STREET
RLP RAYMOND LAMAR PROPERTY
EFS EXAVATION FLOOR SAMPLE
ESS EXCAVATION SIDEWALL SAMPLE

LIMIT OF EXCAVATION
DITCHLINE

SAMPLE POINT

1. SAMPLE LOCATION NUMBER
2. SAMPLE LOCATION
3. PCB IN mg/kg
4. SURVEY NUMBER
5. ELEVATION

MAP SOURCE: Crowder Engineering & Surveying, Inc.



B

B

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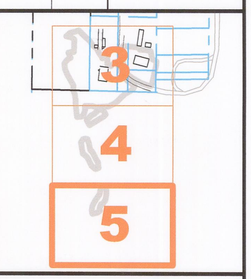
REVISIONS		
#	REVISION NOTES	
1		
2		
3		

SCALE 1"=10'
DR: DGR
CHK: RLM/CP
REV: 0
DATE: 04/14/08
PATH NAME: MS1 CAD\CLOSURE.DWG

PCB REMEDIATION CONFIRMATION SAMPLE LOCATION MAP

BRENT STREET PROPERTIES
CRYSTAL SPRINGS, MS

FIGURE 5



LEGEND

MS1 112 & 114 BRENT STREET
MS2 115 BRENT STREET
RLP RAYMOND LAMAR PROPERTY
EFS EXAVATION FLOOR SAMPLE
ESS EXCAVATION SIDEWALL SAMPLE

LIMIT OF EXCAVATION

DITCHLINE

SAMPLE POINT

1. SAMPLE LOCATION NUMBER
2. SAMPLE LOCATION
3. PCB IN mg/kg
4. SURVEY NUMBER
5. ELEVATION

MAP SOURCE: Crowder Engineering & Surveying, Inc.

ANALYTICAL TABLES

Table 1
Summary of On-Site Laboratory Analytical Results
PCB (Aroclor 1260)
MidSouth Leasing and Sales, Inc. Property
112 and 114 Brent Street
Crystal Springs, Mississippi

Sample ID Number	Duplicate	Split	Date Collected	Time Collected	Date Extracted	Date Analyzed	PCB (Aroclor1260) Concentration (mg/Kg)	
MS1-EFS-001-001		YES	1/30/2007	10:55	01/30/2007	01/30/2007	85.00	
Duplicate-001-01/30/07	MS1-EFS-001-001	YES	1/30/2007		01/30/2007	01/30/2007	110.00	
MS1-EFS-001-002		NO	1/30/2007	13:40	01/30/2007	01/30/2007	0.10	U
MS1-EFS-002-001		NO	1/30/2007	11:00	01/30/2007	01/30/2007	0.10	U
MS1-EFS-003-001		NO	1/30/2007	12:00	01/30/2007	01/30/2007	0.10	U
MS1-EFS-004-001		NO	1/30/2007	16:40	01/30/2007	01/30/2007	0.10	U
MS1-EFS-005-001		YES	1/30/2007	16:48	01/30/2007	01/30/2007	0.10	U
MS1-ESS-001-0		NO	1/30/2007	11:02	01/30/2007	01/30/2007	0.18	
MS1-ESS-002-0		NO	1/30/2007	11:04	01/30/2007	01/30/2007	0.11	
MS1-ESS-003-0		NO	1/30/2007	12:03	01/30/2007	01/30/2007	0.10	U
MS1-ESS-004-0		NO	1/30/2007	16:43	01/30/2007	01/30/2007	0.10	U
MS1-FB-001-0		NO	1/30/2007	10:10	02/01/2007	02/01/2007	0.25	U
MS1-EFS-006-001		YES	1/31/2007	10:50	01/31/2007	01/31/2007	0.10	U
Duplicate-001-01/31/07	MS1-EFS-006-001	YES	1/31/2007		01/31/2007	01/31/2007	0.10	U
MS1-EFS-007-001		NO	1/31/2007	13:50	01/31/2007	01/31/2007	0.29	
MS1-EFS-008-001		NO	1/31/2007	15:00	01/31/2007	01/31/2007	0.10	U
MS1-ESS-005-0		NO	1/31/2007	13:45	01/31/2007	01/31/2007	0.10	U
MS1-EFS-017-001		YES	2/12/2007	11:00	02/12/2007	02/12/2007	0.10	U
Duplicate-001-02/12/07	MS1-EFS-017-001	YES	2/12/2007		02/12/2007	02/12/2007	0.10	U
MS1-FB-003-0		NO	2/12/2007	09:50	02/15/2007	02/15/2007	0.25	U
MS1-EFS-018-001		YES	2/13/2007	13:40	02/13/2007	02/13/2007	0.10	U
Duplicate-001-02/13/07	MS1-EFS-018-001	YES	2/13/2007		02/13/2007	02/13/2007	0.10	U
MS1-EFS-019-001		NO	2/13/2007	13:43	02/13/2007	02/13/2007	0.15	
MS1-EFS-020-001		NO	2/13/2007	15:10	02/13/2007	02/13/2007	0.10	U
MS1-ESS-007-0		NO	2/13/2007	13:45	02/13/2007	02/13/2007	0.10	U
MS1-ESS-008-0		NO	2/13/2007	13:49	02/13/2007	02/13/2007	0.20	
MS1-EFS-021-001		NO	2/14/2007	13:35	02/14/2007	02/14/2007	0.10	U
MS1-EFS-022-001		YES	2/14/2007	13:45	02/14/2007	02/14/2007	0.10	U
Duplicate-001-02/14/07	MS1-EFS-022-001	YES	2/14/2007		02/14/2007	02/14/2007	0.10	U
MS1-EFS-023-001		NO	2/14/2007	16:00	02/14/2007	02/14/2007	0.68	
MS1-ESS-009-0		NO	2/14/2007	16:04	02/14/2007	02/14/2007	0.10	U
MS1-EFS-024-001		YES	2/15/2007	12:45	02/15/2007	02/15/2007	0.10	U
Duplicate-001-02/15/07	MS1-EFS-024-001	YES	2/15/2007		02/15/2007	02/15/2007	0.10	U
MS1-EFS-025-001		NO	2/15/2007	13:30	02/15/2007	02/15/2007	20.00	
MS1-EFS-025-002		NO	2/15/2007	16:15	02/15/2007	02/15/2007	0.10	U
MS1-EFS-026-001		NO	2/15/2007	13:37	02/15/2007	02/15/2007	0.16	
MS1-ESS-010-0		NO	2/15/2007	14:20	02/15/2007	02/15/2007	4.90	
MS1-EFS-027-001	MS1-EFS-027-001	YES	2/16/2007	09:25	02/16/2007	02/16/2007	0.11	
Duplicate-001-02/16/07		YES	2/16/2007		02/16/2007	02/16/2007	0.10	U
MS1-EFS-028-001		NO	2/16/2007	09:31	02/16/2007	02/16/2007	0.10	U
MS1-EFS-029-001		NO	2/16/2007	09:35	02/16/2007	02/16/2007	0.10	U
MS1-ESS-011-0		NO	2/16/2007	10:15	02/16/2007	02/16/2007	0.10	U
MS1-ESS-012-0		NO	2/16/2007	10:17	02/16/2007	02/16/2007	0.10	U
MS1-EFS-030-001		YES	2/19/2007	16:35	02/19/2007	02/19/2007	0.10	U
Duplicate-001-02/19/07	MS1-EFS-030-001	YES	2/19/2007		02/19/2007	02/19/2007	0.10	U

Table 1
Summary of On-Site Laboratory Analytical Results
PCB (Aroclor 1260)
MidSouth Leasing and Sales, Inc. Property
112 and 114 Brent Street
Crystal Springs, Mississippi

Sample ID Number	Duplicate	Split	Date Collected	Time Collected	Date Extracted	Date Analyzed	PCB (Aroclor1260) Concentration (mg/Kg)	
MS1-EFS-031-001		NO	2/19/2007	16:38	02/19/2007	02/19/2007	0.10	U
MS1-ESS-013-0		NO	2/19/2007	16:42	02/19/2007	02/19/2007	0.10	U
MS1-ESS-014-0		NO	2/19/2007	16:44	02/19/2007	02/19/2007	0.10	U
MS1-FB-004-0		NO	2/19/2007	14:15	02/20/2007	02/20/2007	0.25	U
MS1-EFS-009-001		YES	2/2/2007	12:00	02/02/2007	02/02/2007	0.10	U
Duplicate-02/02/07	MS1-EFS-009-001	YES	2/2/2007		02/02/2007	02/02/2007	0.10	U
MS1-EFS-032-001		YES	2/26/2007	12:48	02/26/2007	02/26/2007	0.10	U
Duplicate-001-02/26/07	MS1-EFS-032-001	YES	2/26/2007		02/26/2007	02/26/2007	0.10	U
MS1-EFS-033-001		NO	2/26/2007	12:50	02/26/2007	02/26/2007	0.10	U
MS1-EFS-034-001		NO	2/26/2007	12:52	02/26/2007	02/26/2007	0.10	U
MS1-EFS-035-001		NO	2/26/2007	14:08	02/26/2007	02/26/2007	0.10	U
MS1-EFS-036-001		NO	2/26/2007	14:10	02/26/2007	02/26/2007	0.10	U
MS1-EFS-037-001		YES	2/26/2007	15:05	02/26/2007	02/26/2007	0.10	U
MS1-ESS-015-0		NO	2/26/2007	12:53	02/26/2007	02/26/2007	0.14	
MS1-ESS-016-0		NO	2/26/2007	12:55	02/26/2007	02/26/2007	0.34	
MS1-ESS-017-0		NO	2/26/2007	12:58	02/26/2007	02/26/2007	0.10	U
MS1-ESS-018-0		NO	2/26/2007	14:12	02/26/2007	02/26/2007	0.10	U
MS1-ESS-019-0		NO	2/26/2007	15:08	02/26/2007	02/26/2007	0.10	U
MS1-FB-005-0		NO	2/26/2007	10:50	03/01/2007	03/01/2007	0.25	U
MS1-EFS-038-001		YES	2/27/2007	16:30	02/27/2007	02/27/2007	0.10	U
Duplicate-002-02/27/07	MS1-EFS-038-001	YES	2/27/2007		02/27/2007	02/27/2007	0.10	U
MS1-EFS-039-001		NO	2/27/2007	16:35	02/27/2007	02/27/2007	0.17	
MS1-EFS-040-001		YES	2/28/2007	11:00	02/28/2007	02/28/2007	0.10	U
Duplicate-002-02/28/07	MS1-EFS-040-001	YES	2/28/2007		02/28/2007	02/28/2007	0.10	U
MS1-EFS-041-001		NO	2/28/2007	13:44	02/28/2007	02/28/2007	0.10	U
MS1-EFS-042-001		NO	2/28/2007	13:50	02/28/2007	02/28/2007	0.10	U
MS1-EFS-043-001		NO	2/28/2007	14:40	02/28/2007	02/28/2007	0.10	U
MS1-EFS-010-001		YES	2/5/2007	11:28	02/05/2007	02/05/2007	0.10	U
Duplicate-02/05/07	MS1-EFS-010-001	YES	2/5/2007		02/05/2007	02/05/2007	0.10	U
MS1-FB-002-0		NO	2/5/2007	08:21	02/08/2007	02/08/2007	0.25	U
MS1-EFS-011-001		YES	2/6/2007	11:00	02/06/2007	02/06/2007	0.10	U
Duplicate-001-02/06/07	MS1-EFS-011-001	YES	2/6/2007		02/06/2007	02/06/2007	0.10	U
MS1-EFS-012-001		YES	2/7/2007	10:50	02/07/2007	02/07/2007	0.10	U
Duplicate-001-02/07/06	MS1-EFS-012-001	YES	2/7/2007		02/07/2007	02/07/2007	0.10	U
MS1-EFS-013-001		NO	2/7/2007	12:37	02/07/2007	02/07/2007	0.10	U
MS1-EFS-014-001		YES	2/8/2007	12:05	02/08/2007	02/08/2007	0.10	U
Duplicate-002-02/08/07	MS1-EFS-014-001	YES	2/8/2007		02/08/2007	02/08/2007	0.10	U
MS1-EFS-015-001		NO	2/8/2007	12:09	02/08/2007	02/08/2007	0.19	
MS1-EFS-016-001		NO	2/8/2007	14:11	02/08/2007	02/08/2007	7.80	
MS1-EFS-016-002		NO	2/8/2007	15:52	02/08/2007	02/08/2007	0.10	U
MS1-ESS-006-0		NO	2/8/2007	12:14	02/08/2007	02/08/2007	0.14	
MS1-EFS-044-001		YES	3/2/2007	10:30	03/02/2007	03/02/2007	0.10	U
Duplicate-001-03/02/07	MS1-EFS-044-001	YES	3/2/2007		03/02/2007	03/02/2007	0.27	
MS1-EFS-045-001		YES	3/2/2007	12:10	03/02/2007	03/02/2007	0.10	U
MS1-ESS-020-0		YES	3/27/2007	11:53	03/27/2007	03/27/2007	0.10	U

Table 1
Summary of On-Site Laboratory Analytical Results
PCB (Aroclor 1260)
MidSouth Leasing and Sales, Inc. Property
112 and 114 Brent Street
Crystal Springs, Mississippi

Sample ID Number	Duplicate	Split	Date Collected	Time Collected	Date Extracted	Date Analyzed	PCB (Aroclor1260) Concentration (mg/Kg)	
Duplicate-001-03/27/07	MS1-ESS-020-0	YES	3/27/2007		03/27/2007	03/27/2007	0.10	U
MS1-FB-007-0		NO	3/27/2007	08:30	03/29/2007	03/29/2007	0.25	U
MS1-EFS-046-001		YES	3/5/2007	12:05	03/05/2007	03/05/2007	0.10	U
Duplicate-001-03/05/07	MS1-EFS-046-001	YES	3/5/2007		03/05/2007	03/05/2007	0.10	U
MS1-EFS-047-001		NO	3/5/2007	13:10	03/05/2007	03/05/2007	0.10	U
MS1-FB-006-0		NO	3/5/2007	09:00	03/07/2007	03/07/2007	0.25	U

Table 2
Summary of On-Site Laboratory Analytical Results
MidSouth Leasing and Sales, Inc. Property
115 Brent Street
Crystal Springs, MS

Sample ID Number	Duplicate	Split	Date Collected	Time Collected	Date Extracted	Date Analyzed	PCB (Aroclor1260) Concentration (mg/Kg)	
Duplicate-001-03/06/07	MS2-EFS-001-001	YES	03/06/07		03/06/2007	03/06/2007	0.10	U
MS2-EFS-001-001		YES	03/06/07	10:40	03/06/2007	03/06/2007	0.10	U
MS2-EFS-002-001		NO	03/06/07	13:00	03/06/2007	03/06/2007	0.14	
MS2-EFS-003-001		NO	03/06/07	13:02	03/06/2007	03/06/2007	0.10	U
MS2-EFS-004-001		NO	03/06/07	15:00	03/06/2007	03/06/2007	5.30	
MS2-EFS-004-002		NO	03/06/07	16:45	03/06/2007	03/06/2007	0.10	U
MS2-EFS-005-001		NO	03/06/07	16:12	03/06/2007	03/06/2007	0.93	
MS2-EFS-006-001		NO	03/06/07	16:14	03/06/2007	03/06/2007	0.12	
MS2-EFS-007-001		NO	03/06/07	16:15	03/06/2007	03/06/2007	0.10	U
MS2-ESS-001-0		NO	03/06/07	10:42	03/06/2007	03/06/2007	0.10	U
MS2-ESS-002-0		NO	03/06/07	10:45	03/06/2007	03/06/2007	0.50	
MS2-ESS-003-0		NO	03/06/07	13:04	03/06/2007	03/06/2007	0.10	U
MS2-ESS-004-0		NO	03/06/07	15:03	03/06/2007	03/06/2007	0.10	U
MS2-ESS-005-0		NO	03/06/07	16:18	03/06/2007	03/06/2007	0.10	U
MS2-FB-001-0		NO	03/06/07	09:30	03/07/2007	03/07/2007	0.25	U
Duplicate-001-03/07/07	MS2-EFS-008-001	YES	03/07/07		03/07/2007	03/07/2007	0.10	U
MS2-EFS-008-001		YES	03/07/07	13:20	03/07/2007	03/07/2007	0.10	U
MS2-EFS-009-001		NO	03/07/07	13:24	03/07/2007	03/07/2007	0.64	
MS2-EFS-010-001		NO	03/07/07	13:28	03/07/2007	03/07/2007	0.26	
MS2-EFS-011-001		NO	03/07/07	14:48	03/07/2007	03/07/2007	0.10	U
MS2-EFS-012-001		NO	03/07/07	16:20	03/07/2007	03/07/2007	0.10	U
MS2-ESS-006-0		NO	03/07/07	15:15	03/07/2007	03/07/2007	0.10	U
MS2-ESS-007-0		NO	03/07/07	15:17	03/07/2007	03/07/2007	3.20	
MS2-ESS-008-0		NO	03/07/07	16:25	03/07/2007	03/07/2007	0.34	
Duplicate-001-03/08/07	MS2-EFS-013-001	YES	03/08/07		03/08/2007	03/08/2007	0.10	U
MS2-EFS-013-001		YES	03/08/07	09:35	03/08/2007	03/08/2007	0.10	U
MS2-EFS-014-001		NO	03/08/07	15:05	03/08/2007	03/08/2007	11.00	
MS2-EFS-015-001		NO	03/08/07	15:08	03/08/2007	03/08/2007	12.00	
MS2-EFS-016-001		NO	03/08/07	15:50	03/08/2007	03/08/2007	0.10	U
MS2-ESS-009-0		NO	03/08/07	09:38	03/08/2007	03/08/2007	0.10	U
MS2-ESS-010-0		NO	03/08/07	09:41	03/08/2007	03/08/2007	0.10	U
Duplicate-001-03/09/07	MS2-EFS-017-001	YES	03/09/07		03/09/2007	03/09/2007	0.10	U
MS2-EFS-017-001		YES	03/09/07	10:20	03/09/2007	03/09/2007	0.10	U
MS2-EFS-018-001		NO	03/09/07	10:22	03/09/2007	03/09/2007	0.10	U
MS2-EFS-019-001		NO	03/09/07	10:25	03/09/2007	03/09/2007	0.10	U
MS2-EFS-020-001		NO	03/09/07	11:15	03/09/2007	03/09/2007	0.10	U
MS2-EFS-021-001		YES	03/09/07	11:18	03/09/2007	03/09/2007	1.30	
MS2-EFS-021-002		NO	03/09/07	13:32	03/09/2007	03/09/2007	0.10	U
MS2-ESS-011-0		NO	03/09/07	10:26	03/09/2007	03/09/2007	1.40	
MS2-ESS-012-0		NO	03/09/07	10:28	03/09/2007	03/09/2007	0.10	U

Table 2
Summary of On-Site Laboratory Analytical Results
MidSouth Leasing and Sales, Inc. Property
115 Brent Street
Crystal Springs, MS

Sample ID Number	Duplicate	Split	Date Collected	Time Collected	Date Extracted	Date Analyzed	PCB (Aroclor1260) Concentration (mg/Kg)	
MS2-ESS-013-0		NO	03/09/07	10:30	03/09/2007	03/09/2007	0.96	
MS2-ESS-014-0		NO	03/09/07	11:22	03/09/2007	03/09/2007	**110.00**	
MS2-ESS-015-0		NO	03/09/07	11:26	03/09/2007	03/09/2007	0.10	U
Duplicate-001-03/12/07	MS2-EFS-022-001	YES	03/12/07		03/12/2007	03/12/2007	0.10	U
MS2-EFS-022-001		YES	03/12/07	13:05	03/12/2007	03/12/2007	0.10	U
MS2-EFS-023-001		NO	03/12/07	13:07	03/12/2007	03/12/2007	0.10	U
MS2-EFS-024-001		NO	03/12/07	13:09	03/12/2007	03/12/2007	0.10	U
MS2-EFS-025-001		NO	03/12/07	14:40	03/12/2007	03/12/2007	0.10	U
MS2-EFS-026-001		NO	03/12/07	14:43	03/12/2007	03/12/2007	0.10	U
MS2-ESS-016-0		NO	03/12/07	13:12	03/12/2007	03/12/2007	0.10	U
MS2-ESS-017-0		NO	03/12/07	14:47	03/12/2007	03/12/2007	0.10	U
MS2-ESS-018-0		NO	03/12/07	14:50	03/12/2007	03/12/2007	0.10	U
MS2-ESS-019-0		NO	03/12/07	14:52	03/12/2007	03/12/2007	0.10	U
Duplicate-002-03/13/07	MS2-EFS-027-001	YES	03/13/07		03/13/2007	03/13/2007	0.10	U
MS2-EFS-027-001		YES	03/13/07	10:55	03/13/2007	03/13/2007	0.10	U
MS2-EFS-028-001		NO	03/13/07	10:58	03/13/2007	03/13/2007	0.10	U
MS2-EFS-029-001		NO	03/13/07	11:00	03/13/2007	03/13/2007	0.10	U
MS2-EFS-030-001		NO	03/13/07	15:00	03/13/2007	03/13/2007	0.10	U
MS2-ESS-020-0		NO	03/13/07	11:02	03/13/2007	03/13/2007	0.19	
MS2-ESS-021-0		NO	03/13/07	11:03	03/13/2007	03/13/2007	0.10	U
MS2-ESS-022-0		NO	03/13/07	11:06	03/13/2007	03/13/2007	0.10	U
Duplicate-001-03/16/07	MS2-EFS-031-001	YES	03/16/07		03/16/2007	03/16/2007	0.15	
MS2-EFS-031-001		YES	03/16/07	10:30	03/16/2007	03/16/2007	0.10	U
MS2-EFS-032-001		NO	03/16/07	10:35	03/16/2007	03/16/2007	0.10	U
Duplicate-001-03/19/07	MS2-EFS-014-002	YES	03/19/07		03/19/2007	03/19/2007	0.10	U
MS2-EFS-014-002		YES	03/19/07	13:40	03/19/2007	03/19/2007	0.10	U
MS2-EFS-015-002		NO	03/19/07	13:44	03/19/2007	03/19/2007	0.10	U
MS2-EFS-033-001		NO	03/19/07	17:55	03/19/2007	03/19/2007	0.10	U
MS2-EFS-034-001		NO	03/19/07	18:10	03/19/2007	03/19/2007	0.10	U
MS2-FB-003-0		NO	03/19/07	08:50	03/22/2007	03/22/2007	0.25	U
Duplicate-001-03/20/07	MS2-EFS-035-001	YES	03/20/07		03/20/2007	03/20/2007	0.10	U
MS2-EFS-005-002		NO	03/20/07	15:25	03/20/2007	03/20/2007	0.10	U
MS2-EFS-006-002		NO	03/20/07	15:28	03/20/2007	03/20/2007	0.10	U
MS2-EFS-007-002		NO	03/20/07	17:00	03/20/2007	03/20/2007	0.10	U
MS2-EFS-035-001		YES	03/20/07	10:40	03/20/2007	03/20/2007	0.10	U
MS2-EFS-036-001		NO	03/20/07	10:44	03/20/2007	03/20/2007	0.10	
MS2-EFS-037-001		NO	03/20/07	15:33	03/20/2007	03/20/2007	0.10	U
Duplicate-001-03/21/07	MS2-EFS-038-001	YES	03/21/07		03/21/2007	03/21/2007	0.23	
MS2-EFS-038-001		YES	03/21/07	13:15	03/21/2007	03/21/2007	0.27	
MS2-EFS-039-001		NO	03/21/07	13:20	03/21/2007	03/21/2007	0.10	U

Table 2
Summary of On-Site Laboratory Analytical Results
MidSouth Leasing and Sales, Inc. Property
115 Brent Street
Crystal Springs, MS

Sample ID Number	Duplicate	Split	Date Collected	Time Collected	Date Extracted	Date Analyzed	PCB (Aroclor1260) Concentration (mg/Kg)	
MS2-EFS-040-001		NO	03/21/07	13:59	03/21/2007	03/21/2007	0.10	U
Duplicate-001-03/26/07	MS2-EFS-041-001	YES	03/26/07		03/26/2007	03/26/2007	0.53	
MS2-EFS-041-001		YES	03/26/07	12:20	03/26/2007	03/26/2007	0.48	
MS2-EFS-042-001		NO	03/26/07	12:24	03/26/2007	03/26/2007	0.10	U
MS2-EFS-043-001		NO	03/26/07	12:26	03/26/2007	03/26/2007	0.10	U
MS2-EFS-044-001		NO	03/26/07	15:50	03/26/2007	03/26/2007	0.10	U
MS2-EFS-045-001		NO	03/26/07	15:53	03/26/2007	03/26/2007	0.10	U
MS2-ESS-023-0		NO	03/26/07	15:57	03/26/2007	03/26/2007	0.10	U
MS2-FB-004-0		NO	03/26/07	08:15	03/29/2007	03/29/2007	0.25	U
Duplicate-001-03/28/07	MS2-EFS-048-001	YES	03/28/07		03/28/2007	03/28/2007	0.10	U
MS2-EFS-048-001		YES	03/28/07	15:20	03/28/2007	03/28/2007	0.10	U
MS2-EFS-049-001		NO	03/28/07	15:24	03/28/2007	03/28/2007	0.10	U
MS2-EFS-050-001		NO	03/28/07	15:30	03/28/2007	03/28/2007	0.10	U
MS2-EFS-051-001		NO	03/28/07	15:33	03/28/2007	03/28/2007	0.10	U
Duplicate-001-03/29/07	MS2-EFS-052-001	YES	03/29/07		03/29/2007	03/29/2007	0.10	U
MS2-EFS-052-001		YES	03/29/07	16:58	03/29/2007	03/29/2007	0.10	U
MS2-EFS-054-001		NO	03/29/07	17:04	03/29/2007	03/29/2007	0.10	U
MS2-EFS-055-001		NO	03/29/07	18:05	03/29/2007	03/29/2007	0.10	U
MS2-ESS-024-0		NO	03/29/07	17:10	03/29/2007	03/29/2007	0.10	U
Duplicate-001-03/30/07	MS2-EFS-056-001	YES	03/30/07		03/30/2007	03/30/2007	0.10	U
MS2-EFS-056-001		YES	03/30/07	11:15	03/30/2007	03/30/2007	0.10	U
MS2-EFS-057-001		NO	03/30/07	11:19	03/30/2007	03/30/2007	0.10	U
Duplicate-001-04/02/07	MS2-ESS-025	YES	04/02/07		04/02/2007	04/02/2007	0.10	U
MS2-ESS-025-0		YES	04/02/07	14:20	04/02/2007	04/02/2007	0.10	U
Duplicate-001-04/03/07	MS2-EFS-058-001	YES	04/03/07		04/03/2007	04/03/2007	0.10	U
MS2-EFS-058-001		YES	04/03/07	14:49	04/03/2007	04/03/2007	0.10	U
MS2-EFS-059-001		NO	04/03/07	17:00	04/03/2007	04/03/2007	0.10	U
MS2-EFS-060-001		NO	04/03/07	17:01	04/03/2007	04/03/2007	0.10	U
MS2-EFS-061-001		NO	04/03/07	17:30	04/03/2007	04/03/2007	0.10	U
MS2-ESS-026-0 (MM105)*		NO	04/03/07	14:53	04/03/2007	04/03/2007	0.10	U
MS2-FB-005-0		NO	04/03/07	09:15	04/04/2007	04/04/2007	0.25	U
Duplicate-001-04/05/07	MS2-EFS-062-001	YES	04/05/07		04/05/2007	04/05/2007	0.10	U
MS2-EFS-062-001		YES	04/05/07	14:05	04/05/2007	04/05/2007	0.10	U
MS2-EFS-063-001		NO	04/05/07	15:55	04/05/2007	04/05/2007	0.10	U
MS2-FB-006-0		NO	04/09/07	09:07	04/10/2007	04/10/2007	0.25	U
Duplicate-001-04/11/07	MS2-EFS-064-001	YES	04/11/07		04/11/2007	04/11/2007	0.10	U
MS2-EFS-064-001		YES	04/11/07	15:30	04/11/2007	04/11/2007	0.10	U
MS2-EFS-065-001		NO	04/11/07	15:35	04/11/2007	04/11/2007	0.13	
MS2-EFS-066-001		NO	04/11/07	15:40	04/11/2007	04/11/2007	0.10	U
MS2-EFS-067-001		NO	04/11/07	17:10	04/11/2007	04/11/2007	0.10	U

Table 2
Summary of On-Site Laboratory Analytical Results
MidSouth Leasing and Sales, Inc. Property
115 Brent Street
Crystal Springs, MS

Sample ID Number	Duplicate	Split	Date Collected	Time Collected	Date Extracted	Date Analyzed	PCB (Aroclor1260) Concentration (mg/Kg)	
MS2-EFS-068-001		NO	04/11/07	17:14	04/11/2007	04/11/2007	0.10	U
Duplicate-001-04/16/07	MS2-EFS-069-001	YES	04/16/07		04/16/2007	04/16/2007	0.10	U
MS2-EFS-069-001		YES	04/16/07	13:45	04/16/2007	04/16/2007	0.10	U
MS2-EFS-070-001		NO	04/16/07	13:48	04/16/2007	04/16/2007	0.10	U
MS2-EFS-071-001		NO	04/16/07	15:40	04/16/2007	04/16/2007	0.10	U
MS2-EFS-072-001		NO	04/16/07	15:42	04/16/2007	04/16/2007	0.10	U
MS2-EFS-073-001		NO	04/16/07	15:48	04/16/2007	04/16/2007	0.10	U
MS2-EFS-074-001		NO	04/16/07	16:01	04/16/2007	04/16/2007	0.10	U
MS2-ESS-026-0 (MM121)*		NO	04/16/07	13:50	04/16/2007	04/16/2007	0.14	
MS2-ESS-027-0 (MM122)*		NO	04/16/07	13:52	04/16/2007	04/16/2007	0.10	U
MS2-FB-007-0		NO	04/16/07	08:20	04/19/2007	04/19/2007	0.25	U
Duplicate-001-04/19/07	MS2-EFS-075-001	YES	04/19/07		04/19/2007	04/19/2007	0.15	
MS2-EFS-075-001		YES	04/19/07	09:55	04/19/2007	04/19/2007	0.15	
MS2-EFS-076-001		NO	04/19/07	09:56	04/19/2007	04/19/2007	0.10	U
MS2-EFS-077-001		NO	04/19/07	13:30	04/19/2007	04/19/2007	0.10	U
MS2-EFS-078-001		NO	04/19/07	13:33	04/19/2007	04/19/2007	0.10	U
MS2-EFS-079-001		NO	04/19/07	13:35	04/19/2007	04/19/2007	0.10	U
MS2-EFS-080-001		NO	04/19/07	13:40	04/19/2007	04/19/2007	0.10	U
Duplicate-001-04/20/07	MS2-EFS-081-001	YES	04/20/07		04/20/2007	04/20/2007	0.10	U
MS2-EFS-081-001		YES	04/20/07	13:00	04/20/2007	04/20/2007	0.10	U
MS2-EFS-082-001		NO	04/20/07	13:01	04/20/2007	04/20/2007	0.10	U
MS2-EFS-083-001		NO	04/20/07	13:02	04/20/2007	04/20/2007	0.10	U
MS2-ESS-027-0 (MM138)*		NO	04/20/07	13:04	04/20/2007	04/20/2007	0.10	U
MS2-ESS-028-0		NO	04/20/07	13:05	04/20/2007	04/20/2007	0.10	U
Duplicate-001-04/23/07	MS2-EFS-084-001	YES	04/23/07		04/23/2007	04/23/2007	0.10	U
MS2-EFS-084-001		YES	04/23/07	13:40	04/23/2007	04/23/2007	0.10	U
MS2-EFS-085-001		NO	04/23/07	13:41	04/23/2007	04/23/2007	0.10	U
MS2-EFS-086-001		NO	04/23/07	13:43	04/23/2007	04/23/2007	0.10	U
MS2-EFS-087-001		NO	04/23/07	13:46	04/23/2007	04/23/2007	0.10	U
MS2-EFS-088-001		NO	04/23/07	13:47	04/23/2007	04/23/2007	0.10	U
MS2-EFS-089-001		NO	04/23/07	13:49	04/23/2007	04/23/2007	0.10	U
MS2-EFS-090-001		NO	04/23/07	14:15	04/23/2007	04/23/2007	0.10	U
MS2-FB-008-0		NO	04/23/07	10:20	04/26/2007	04/26/2007	0.25	U
Duplicate-001-04/24/07	MS2-EFS-091-001	YES	04/24/07		04/24/2007	04/24/2007	0.10	U
MS2-EFS-091-001		YES	04/24/07	10:05	04/24/2007	04/24/2007	0.10	U
MS2-EFS-092-001		NO	04/24/07	10:08	04/24/2007	04/24/2007	0.10	U
Duplicate-001-04/25/07	MS2-EFS-093-001	YES	04/25/07		04/25/2007	04/25/2007	0.16	
MS2-EFS-093-001		YES	04/25/07	10:05	04/25/2007	04/25/2007	0.16	
MS2-EFS-094-001		NO	04/25/07	10:07	04/25/2007	04/25/2007	0.10	U
MS2-EFS-095-001		NO	04/25/07	10:09	04/25/2007	04/25/2007	0.10	U

Table 2
Summary of On-Site Laboratory Analytical Results
MidSouth Leasing and Sales, Inc. Property
115 Brent Street
Crystal Springs, MS

Sample ID Number	Duplicate	Split	Date Collected	Time Collected	Date Extracted	Date Analyzed	PCB (Aroclor1260) Concentration (mg/Kg)	
MS2-EFS-096-001		NO	04/25/07	11:10	04/25/2007	04/25/2007	0.10	U
MS2-EFS-097-001		NO	04/25/07	11:11	04/25/2007	04/25/2007	0.10	U
MS2-ESS-029-0		NO	04/25/07	10:11	04/25/2007	04/25/2007	0.10	U
MS2-ESS-030-0		NO	04/25/07	10:14	04/25/2007	04/25/2007	0.10	U
Duplicate-001-04/27/07	MS2-ESS-031	YES	04/27/07		04/27/2007	04/27/2007	0.10	U
MS2-ESS-031-0		YES	04/27/07	12:55	04/27/2007	04/27/2007	0.10	U
MS2-ESS-032-0		NO	04/27/07	12:56	04/27/2007	04/27/2007	0.10	U
Duplicate-001-04/30/07	MS2-EFS-098-001	YES	04/30/07		04/30/2007	04/30/2007	0.10	U
MS2-EFS-098-001		YES	04/30/07	12:31	04/30/2007	04/30/2007	0.10	U
MS2-EFS-099-001		NO	04/30/07	12:32	04/30/2007	04/30/2007	0.10	U
MS2-EFS-100-001		NO	04/30/07	12:35	04/30/2007	04/30/2007	0.10	U
MS2-EFS-101-001		NO	04/30/07	12:36	04/30/2007	04/30/2007	0.10	U
MS2-EFS-102-001		NO	04/30/07	12:38	04/30/2007	04/30/2007	0.10	U
MS2-EFS-103-001		NO	04/30/07	14:31	04/30/2007	04/30/2007	0.10	U
MS2-EFS-104-001		NO	04/30/07	14:33	04/30/2007	04/30/2007	0.10	U
MS2-EFS-105-001		NO	04/30/07	16:25	04/30/2007	04/30/2007	0.10	U
MS2-EFS-106-001		YES	04/30/07	16:27	04/30/2007	04/30/2007	0.10	U
MS2-EFS-107-001		NO	04/30/07	16:35	04/30/2007	04/30/2007	0.10	U
MS2-EFS-108-001		NO	04/30/07	16:37	04/30/2007	04/30/2007	0.10	U
MS2-ESS-033-0		NO	04/30/07	12:40	04/30/2007	04/30/2007	1.10	
MS2-ESS-034-0		NO	04/30/07	12:42	04/30/2007	04/30/2007	0.10	U
MS2-FB-009-0		NO	04/30/07	08:14	05/03/2007	05/03/2007	0.25	U
Duplicate-001-05/01/07	MS2-EFS-109-001	YES	05/01/07		05/01/2007	05/01/2007	0.10	U
MS2-EFS-109-001		YES	05/01/07	14:53	05/01/2007	05/01/2007	0.10	U
MS2-EFS-110-001		NO	05/01/07	14:57	05/01/2007	05/01/2007	0.10	U
MS2-ESS-035-0		NO	05/01/07	14:42	05/01/2007	05/01/2007	0.10	U
MS2-ESS-036-0		NO	05/01/07	14:44	05/01/2007	05/01/2007	0.10	U
MS2-ESS-037-0		NO	05/01/07	14:47	05/01/2007	05/01/2007	0.10	U
Duplicate-001-05/02/07	MS2-ESS-038	YES	05/02/07		05/02/2007	05/02/2007	0.61	
MS2-ESS-038-0		YES	05/02/07	10:38	05/02/2007	05/02/2007	0.42	
Duplicate-001-05/03/07	MS2-EFS-031-002	YES	05/03/07		05/03/2007	05/03/2007	0.10	U
MS2-EFS-002-002		NO	05/03/07	12:48	05/03/2007	05/03/2007	0.10	U
MS2-EFS-002-003		NO	05/03/07	12:49	05/03/2007	05/03/2007	0.10	U
MS2-EFS-002-004		NO	05/03/07	12:51	05/03/2007	05/03/2007	0.10	U
MS2-EFS-002-005		NO	05/03/07	12:52	05/03/2007	05/03/2007	0.10	U
MS2-EFS-002-006		NO	05/03/07	12:54	05/03/2007	05/03/2007	0.10	U
MS2-EFS-002-007		NO	05/03/07	12:56	05/03/2007	05/03/2007	0.10	U
MS2-EFS-003-002		NO	05/03/07	13:19	05/03/2007	05/03/2007	0.10	U
MS2-EFS-003-003		NO	05/03/07	13:20	05/03/2007	05/03/2007	0.10	U
MS2-EFS-003-004		NO	05/03/07	13:21	05/03/2007	05/03/2007	0.10	U

Table 2
Summary of On-Site Laboratory Analytical Results
MidSouth Leasing and Sales, Inc. Property
115 Brent Street
Crystal Springs, MS

Sample ID Number	Duplicate	Split	Date Collected	Time Collected	Date Extracted	Date Analyzed	PCB (Aroclor1260) Concentration (mg/Kg)	
MS2-EFS-003-005		NO	05/03/07	13:22	05/03/2007	05/03/2007	0.10	U
MS2-EFS-015-002		NO	05/03/07	14:10	05/03/2007	05/03/2007	0.10	U
MS2-EFS-015-003		NO	05/03/07	14:11	05/03/2007	05/03/2007	0.10	U
MS2-EFS-015-004		YES	05/03/07	14:12	05/03/2007	05/03/2007	0.10	U
MS2-EFS-015-005		NO	05/03/07	14:13	05/03/2007	05/03/2007	0.10	U
MS2-EFS-015-006		NO	05/03/07	14:14	05/03/2007	05/03/2007	0.10	U
MS2-EFS-015-007		NO	05/03/07	14:15	05/03/2007	05/03/2007	0.10	U
MS2-EFS-016-002		NO	05/03/07	15:22	05/03/2007	05/03/2007	0.10	U
MS2-EFS-016-003		NO	05/03/07	15:23	05/03/2007	05/03/2007	0.10	U
MS2-EFS-016-004		NO	05/03/07	15:24	05/03/2007	05/03/2007	0.10	U
MS2-EFS-016-005		NO	05/03/07	15:25	05/03/2007	05/03/2007	0.10	U
MS2-EFS-016-006		NO	05/03/07	15:26	05/03/2007	05/03/2007	0.10	U
MS2-EFS-031-002		YES	05/03/07	09:58	05/03/2007	05/03/2007	0.10	U
MS2-EFS-031-003		NO	05/03/07	10:00	05/03/2007	05/03/2007	0.10	U
MS2-EFS-031-004		NO	05/03/07	10:04	05/03/2007	05/03/2007	0.10	U
MS2-EFS-031-005		NO	05/03/07	10:06	05/03/2007	05/03/2007	0.10	U
MS2-EFS-032-002		NO	05/03/07	10:35	05/03/2007	05/03/2007	0.10	U
MS2-EFS-032-003		NO	05/03/07	10:38	05/03/2007	05/03/2007	0.10	U
MS2-EFS-032-004		NO	05/03/07	10:40	05/03/2007	05/03/2007	0.10	U
MS2-EFS-032-005		YES	05/03/07	10:42	05/03/2007	05/03/2007	0.10	U
MS2-EFS-034-002		NO	05/03/07	15:42	05/03/2007	05/03/2007	0.10	U
MS2-EFS-034-003		YES	05/03/07	15:44	05/03/2007	05/03/2007	0.10	U
MS2-EFS-034-004		NO	05/03/07	15:45	05/03/2007	05/03/2007	0.10	U
MS2-EFS-036-002		NO	05/03/07	16:29	05/03/2007	05/03/2007	0.10	U
MS2-EFS-036-003		NO	05/03/07	16:30	05/03/2007	05/03/2007	0.10	U
MS2-EFS-036-004		NO	05/03/07	16:32	05/03/2007	05/03/2007	0.10	U
MS2-EFS-036-005		NO	05/03/07	16:33	05/03/2007	05/03/2007	0.10	U
MS2-EFS-036-006		NO	05/03/07	16:34	05/03/2007	05/03/2007	0.10	U
Duplicate-001-05/04/07	MS2-EFS-033-002	YES	05/04/07		05/04/2007	05/04/2007	0.10	U
MS2-EFS-004-003		NO	05/04/07	09:30	05/04/2007	05/04/2007	0.10	U
MS2-EFS-004-004		YES	05/04/07	09:32	05/04/2007	05/04/2007	0.10	U
MS2-EFS-004-005		NO	05/04/07	09:33	05/04/2007	05/04/2007	0.10	U
MS2-EFS-004-006		NO	05/04/07	09:35	05/04/2007	05/04/2007	0.10	U
MS2-EFS-004-007		NO	05/04/07	09:36	05/04/2007	05/04/2007	0.10	U
MS2-EFS-004-008		NO	05/04/07	09:37	05/04/2007	05/04/2007	0.10	U
MS2-EFS-033-002		YES	05/04/07	08:50	05/04/2007	05/04/2007	0.10	U
MS2-EFS-033-003		NO	05/04/07	08:53	05/04/2007	05/04/2007	0.10	U
MS2-EFS-033-004		NO	05/04/07	08:54	05/04/2007	05/04/2007	0.10	U
MS2-EFS-033-005		NO	05/04/07	08:56	05/04/2007	05/04/2007	0.10	U
MS2-EFS-035-002		NO	05/04/07	09:10	05/04/2007	05/04/2007	0.10	U

Table 2
Summary of On-Site Laboratory Analytical Results
MidSouth Leasing and Sales, Inc. Property
115 Brent Street
Crystal Springs, MS

Sample ID Number	Duplicate	Split	Date Collected	Time Collected	Date Extracted	Date Analyzed	PCB (Aroclor1260) Concentration (mg/Kg)	
MS2-EFS-035-003		NO	05/04/07	09:12	05/04/2007	05/04/2007	0.10	U
MS2-EFS-035-004		NO	05/04/07	09:13	05/04/2007	05/04/2007	0.10	U
MS2-EFS-035-005		NO	05/04/07	09:15	05/04/2007	05/04/2007	0.10	U
MS2-EFS-046-001		NO	3/26/2007	16:45	03/26/2007	03/26/2007	0.10	U
MS2-EFS-047-001		NO	3/26/2007	16:48	03/26/2007	03/26/2007	0.10	U
MS2-EFS-053-001		NO	3/29/2007	17:01	03/29/2007	03/29/2007	0.10	U

* Duplicated idenitification numbers. On-site laboratory number indicated in parentheses. Sample locations, dates and times have been confimmed.

Table 3
Summary of On-Site Laboratory Analytical Results
PCB (Aroclor 1260)
Raymond Lamar Property
Crystal Springs, Mississippi

Sample ID Number	Duplicate	Split	Date Collected	Time Collected	Date Extracted	Date Analyzed	PCB (Aroclor1260) Concentration (mg/Kg)	
RLP-EFS-001-001		YES	2/19/2007	13:34	02/19/2007	02/19/2007	0.10	U
Duplicate-002-02/19/07	RLP-EFS-001-001	YES	2/19/2007		02/19/2007	02/19/2007	0.10	U
RLP-EFS-002-001		NO	2/19/2007	13:41	02/19/2007	02/19/2007	0.10	U
RLP-EFS-003-001		NO	2/19/2007	13:43	02/19/2007	02/19/2007	0.10	U
RLP-EFS-004-001		NO	2/19/2007	13:44	02/19/2007	02/19/2007	0.10	U
RLP-EFS-005-001		NO	2/19/2007	13:46	02/19/2007	02/19/2007	0.10	U
RLP-EFS-006-001		NO	2/19/2007	13:48	02/19/2007	02/19/2007	0.10	U
RLP-ESS-001-0		NO	2/19/2007	13:50	02/19/2007	02/19/2007	0.10	U
RLP-ESS-002-0		NO	2/19/2007	13:52	02/19/2007	02/19/2007	0.20	
RLP-ESS-003-0		NO	2/19/2007	13:53	02/19/2007	02/19/2007	0.37	
RLP-ESS-004-0		NO	2/19/2007	13:54	02/19/2007	02/19/2007	0.10	U
RLP-ESS-005-0		YES	2/19/2007	13:55	02/19/2007	02/12/2007	0.10	U
RLP-ESS-006-0		NO	2/19/2007	13:57	02/19/2007	02/19/2007	0.72	
RLP-FB-003-0		NO	2/19/2007	13:00	02/20/2007	02/20/2007	0.25	U
RLP-EFS-007-001		YES	2/21/2007	13:00	02/21/2007	02/21/2007	0.10	U
Duplicate-001-02/21/07	RLP-EFS-007-001	YES	2/21/2007		02/21/2007	02/21/2007	0.10	U
RLP-EFS-008-001		NO	2/21/2007	13:02	02/21/2007	02/21/2007	0.10	U
RLP-EFS-009-001		NO	2/21/2007	13:47	02/21/2007	02/21/2007	0.10	U
RLP-EFS-010-001		NO	2/21/2007	14:20	02/21/2007	02/21/2007	0.10	U
RLP-EFS-011-001		NO	2/21/2007	14:23	02/21/2007	02/21/2007	0.10	U
RLP-EFS-012-001		YES	2/21/2007	14:25	02/21/2007	02/21/2007	0.10	U
RLP-EFS-013-001		NO	2/21/2007	14:26	02/21/2007	02/21/2007	0.10	U
RLP-EFS-014-001		NO	2/21/2007	14:28	02/21/2007	02/21/2007	0.10	U
RLP-ESS-007-0		NO	2/21/2007	13:49	02/21/2007	02/21/2007	0.10	U
RLP-ESS-008-0		NO	2/21/2007	13:51	02/21/2007	02/21/2007	0.10	U
RLP-ESS-009-0		NO	2/21/2007	13:55	02/21/2007	02/21/2007	0.10	U
RLP-ESS-010-0		NO	2/21/2007	13:59	02/21/2007	02/21/2007	0.10	U
RLP-ESS-011-0		NO	2/21/2007	14:30	02/21/2007	02/21/2007	0.10	U
RLP-ESS-012-0		NO	2/21/2007	14:32	02/21/2007	02/21/2007	0.10	U
RLP-EFS-015-001		YES	2/22/2007	11:50	02/22/2007	02/22/2007	0.12	
Duplicate-002-02/22/07	RLP-EFS-015-001	YES	2/22/2007		02/22/2007	02/22/2007	0.10	U
RLP-EFS-016-001		NO	2/22/2007	11:52	02/22/2007	02/22/2007	0.10	U
RLP-EFS-017-001		NO	2/22/2007	11:53	02/22/2007	02/22/2007	0.10	U
RLP-EFS-018-001		NO	2/22/2007	11:55	02/22/2007	02/22/2007	0.10	U
RLP-EFS-019-001		NO	2/22/2007	11:56	02/22/2007	02/22/2007	0.17	
RLP-EFS-020-001		NO	2/22/2007	11:57	02/22/2007	02/22/2007	0.10	U
RLP-EFS-021-001		NO	2/22/2007	14:10	02/22/2007	02/22/2007	0.10	U
RLP-EFS-022-001		NO	2/22/2007	14:12	02/22/2007	02/22/2007	0.13	
RLP-EFS-023-001		NO	2/22/2007	14:13	02/22/2007	02/22/2007	0.10	U
RLP-EFS-024-001		NO	2/22/2007	14:16	02/22/2007	02/22/2007	0.10	U
RLP-EFS-025-001		YES	2/22/2007	15:05	02/22/2007	02/22/2007	0.10	U
RLP-EFS-026-001		NO	2/22/2007	15:07	02/22/2007	02/22/2007	0.32	
RLP-EFS-027-001		NO	2/22/2007	17:49	02/22/2007	02/22/2007	0.10	U
RLP-EFS-028-001		NO	2/22/2007	17:50	02/22/2007	02/22/2007	0.10	U
RLP-EFS-029-001		NO	2/22/2007	17:52	02/22/2007	02/22/2007	0.10	U
RLP-EFS-030-001		NO	2/22/2007	17:53	02/22/2007	02/22/2007	0.10	U

Table 3
Summary of On-Site Laboratory Analytical Results
PCB (Aroclor 1260)
Raymond Lamar Property
Crystal Springs, Mississippi

Sample ID Number	Duplicate	Split	Date Collected	Time Collected	Date Extracted	Date Analyzed	PCB (Aroclor1260) Concentration (mg/Kg)	
RLP-EFS-031-001		NO	2/22/2007	17:54	02/22/2007	02/22/2007	0.10	U
RLP-EFS-032-001		NO	2/22/2007	17:56	02/22/2007	02/22/2007	0.10	U
RLP-EFS-033-001		NO	2/22/2007	17:57	02/22/2007	02/22/2007	0.10	U
RLP-EFS-034-001		NO	2/22/2007	18:25	02/22/2007	02/22/2007	0.10	U
RLP-EFS-035-001		NO	2/22/2007	18:27	02/22/2007	02/22/2007	0.10	U
RLP-EFS-036-001		NO	2/22/2007	18:28	02/22/2007	02/22/2007	0.10	U
RLP-EFS-037-001		NO	2/22/2007	18:29	02/22/2007	02/22/2007	0.10	U
RLP-EFS-038-001		NO	2/22/2007	18:30	02/22/2007	02/22/2007	0.10	U
RLP-ESS-013-0		NO	2/22/2007	11:59	02/22/2007	02/22/2007	0.10	U
RLP-ESS-014-0		NO	2/22/2007	12:00	02/22/2007	02/22/2007	0.10	U
RLP-ESS-015-0		NO	2/22/2007	12:02	02/22/2007	02/22/2007	0.61	
RLP-ESS-016-0		NO	2/22/2007	12:04	02/22/2007	02/22/2007	0.10	U
RLP-ESS-017-0		YES	2/22/2007	12:07	02/22/2007	02/22/2007	0.10	U
RLP-ESS-018-0		NO	2/22/2007	14:18	02/22/2007	02/22/2007	0.24	
RLP-ESS-019-0		NO	2/22/2007	14:19	02/22/2007	02/22/2007	0.10	U
RLP-ESS-020-0		NO	2/22/2007	14:21	02/22/2007	02/22/2007	0.10	U
RLP-ESS-021-0		NO	2/22/2007	14:23	02/22/2007	02/22/2007	0.10	U
RLP-ESS-022-0		NO	2/22/2007	15:10	02/22/2007	02/22/2007	0.10	U
RLP-ESS-023-0		NO	2/22/2007	15:14	02/22/2007	02/22/2007	0.10	U
RLP-ESS-024-0		NO	2/22/2007	17:59	02/22/2007	02/22/2007	0.29	
RLP-ESS-025-0		NO	2/22/2007	18:00	02/22/2007	02/22/2007	0.31	
RLP-ESS-026-0		NO	2/22/2007	18:01	02/22/2007	02/22/2007	0.11	
RLP-ESS-027-0		NO	2/22/2007	18:02	02/22/2007	02/22/2007	0.10	U
RLP-ESS-028-0		NO	2/22/2007	18:04	02/22/2007	02/22/2007	0.10	U
RLP-ESS-029-0		NO	2/22/2007	18:05	02/22/2007	02/22/2007	0.19	
RLP-ESS-030-0		NO	2/22/2007	18:07	02/22/2007	02/22/2007	0.10	U
RLP-ESS-031-0		NO	2/22/2007	18:08	02/22/2007	02/22/2007	0.10	U
RLP-ESS-032-0		YES	2/22/2007	18:10	02/22/2007	02/22/2007	0.30	
RLP-ESS-033-0		YES	2/22/2007	18:33	02/22/2007	02/22/2007	0.16	
RLP-ESS-034-0		NO	2/22/2007	18:34	02/22/2007	02/22/2007	0.10	U

APPENDIX 1

APPENDIX 2

1.0 Summary

A total of 334 soil samples were collected and analyzed by the on-site laboratory to confirm remediation of the Brent Street Properties. Of the remediation confirmation soil samples, a total of 10% of the samples were split in the field and submitted to both the on-site laboratory, Environmental Chemistry Consulting Services (ECCS), and SGS Paradigm Analytical Laboratories, Inc. (SGS Paradigm) for confirmatory analysis. The on-site laboratory successfully implemented an extensive Quality Assurance/Quality Control (QA/QC) program as comprehensive and strict as those of the off-site laboratory (see Appendix 1 for on-site laboratory reports). The on-site laboratory QA/QC results, and the results of the split soil samples analyzed by both ECCS and SGS Paradigm, demonstrated excellent consistency and accuracy. Comparison of results of the split samples analyzed by both laboratories showed excellent agreement across the full range of detected Aroclor 1260 concentrations, including those near the PCB action level of 1.0 mg/kg, confirming the suitability of the on-site measurements for confirmation of effective remediation of the three properties.

- Both laboratories consistently met internal QA/QC criteria. Analytical systems were consistent with respect to calibration, surrogate recoveries, matrix spikes, matrix spike duplicates, laboratory control samples, and blanks.
- Overall, 99% of split samples (*i.e.*, on-site versus off-site laboratory) fell within the range of acceptable Relative Percent Differences (RPDs) for split soil samples (RPD Threshold = 100%).
- 98% of the duplicate sample pairs analyzed by the on-site laboratory fell within the acceptable range for RPDs for duplicate soil samples (RPD Threshold = 50%).
- 100% of the duplicate sample pairs analyzed by the off-site laboratory fell within the acceptable range for RPDs for duplicate soil samples (RPD Threshold = 50%).
- The on-site laboratory precision, accuracy, selectivity, and sensitivity were excellent throughout the program.

2.0 On-Site Laboratory Method Procedures

The MDEQ and USEPA Region IV approved the use of the on-site laboratory for assessment and confirmation of remediation for this project as discussed in Section 5.0 of this report. In accordance with the approved QA/QC plan, at least 10% of the samples collected were split and sent to the off-site laboratory to confirm the on-site laboratory results and applicability of those results to the remediation program. Both laboratories had performed consistently during previous phases of assessment and remediation work.

The on-site laboratory used a mini-extraction procedure modifying EPA Method 3500B for sample extraction, EPA Method 3665A for extract cleanup, and EPA Method 8082 for determination of PCBs. The methods used include QA/QC protocols comparable to standard laboratory procedure. Surrogates were added to each sample to monitor extraction performance; analysis was carried out on a gas chromatograph (GC) using capillary columns and an electron capture detector (ECD). Quantitation was based on comparison to standards using daily 6-point calibration curves. Through the use of the GC and ECD, the selectivity and sensitivity of the on-site laboratory method was equivalent to that of the off-site laboratory.

2.1 On-Site Laboratory Sample Preparation and Extraction

For each sample, the on-site laboratory received a 4 oz. sample jar filled with soil that was homogenized by the Field Geologist. After processing the sample (see process description below), on-site laboratory staff re-sealed the sample jar and shipped the sample to the off-site laboratory for confirmatory analysis.

In the on-site laboratory, approximately 4 grams of each sample were weighed into a 20 ml scintillation vial. Approximately 10 grams of sodium sulfate were added to the vial and mixed with the soil until the mixture was free flowing. Surrogate solution containing decachlorobiphenyl [DCBP] and tetrachlorometaxylene [TCMX] was added, followed by addition of 8 mls of solvent (80:20, isooctane: acetone). The container was then sealed and shaken for three 30-second intervals. If the extract exhibited color following the shaking step, it was treated with sulfuric acid to remove interferants. Otherwise, the extract was decanted into injection vials and subsequently injected onto a gas chromatograph equipped with an electron capture detector.

2.2 On-Site Laboratory Analysis

Sample analysis was performed on an RTX-35, 30 m X 0.53mm ID X 0.5-micron film capillary column. Based on site history and prior analyses, the PCBs were quantified as Aroclor 1260. Up to 9 Aroclor 1260 peaks were used to quantify the concentration of PCBs present, based on a 6-point calibration curve that was generated each day. Continuing Calibration Verification (CCV) samples were also run regularly. Allowable surrogate recoveries were 60-140% for both DCPB and TCMX (75-175% for acid treated samples). The nominal reporting limit was approximately 0.100 mg/kg, which is well below the target action level of 1.0 mg/kg.

2.3 On-Site Laboratory QA/QC

The QA/QC parameters of the on-site methodology are described in the on-site laboratory reports (Appendix 1). The on-site laboratory consistently met its QA/QC criteria, ensuring that the analytical system was consistent with respect to calibrations, matrix spikes, matrix spike duplicates, laboratory control samples, and blanks. Sample surrogate recoveries were calculated on a real-time basis and re-extractions and re-analyses were performed on the infrequent occasions that allowable recoveries were not achieved.

3.0 Off-Site Laboratory Method Procedures

The confirmatory off-site laboratory, SGS Paradigm, used approved EPA methods, including EPA Method 3545 for extraction, EPA Method 3665A for cleanup of the extract, and EPA Method 8082 for analysis of the extract for PCBs.

3.1 Off-Site Laboratory Sample Preparation and Extraction

EPA Method 3545, Accelerated Solvent Extraction (also known as, Pressurized Solvent Extraction), was used to extract PCBs from the split samples sent to the off-site laboratory. Approximately 10 grams of soil were mixed and dried with approximately 20 grams of drying agent (sodium sulfate), then extracted in a pressurized, heated extraction device. Two extraction cycles were used.

3.2 Off-Site Laboratory Analysis

The off-site laboratory used EPA Method 8082 for the analysis of samples (USEPA, 1997). The method was virtually the same as that of the on-site laboratory with respect to equipment and methodology.

3.3 Off-Site Laboratory QA/QC

The off-site laboratory consistently met its QA/QC criteria, ensuring that the analytical system was consistent with respect to calibrations, surrogate recoveries, matrix spikes, matrix spike duplicates, laboratory control samples, and blanks (See Appendix 1).

4.0 Comparison of On-Site Laboratory and Off-Site Laboratory Results

4.1 Split Samples

The PCB (Aroclor 1260) data for all split samples are presented in Table 1. Other information regarding these samples, such as collection dates, collection times, and extraction dates, are included in the respective laboratory reports.

The on-site laboratory results are used directly (expressed on an as received or wet weight basis) to compare with the off-site laboratory results. This comparison is most appropriate for evaluating the performance of the on-site laboratory because it coincides exactly with how the on-site laboratory results were used on a real-time basis. For all calculations, all non-detects were set to values equal to the reporting limit.

A comparison of the on-site and off-site laboratory results is illustrated in Figure 1. The regression line, its equation, and the coefficient of determination (R^2) are presented in the figure. The on-site laboratory results strongly correlate with the off-site laboratory results.

To evaluate precision and accuracy, the Relative Percent Difference (RPD; RPD =([on-site-off-site]/{[on-site + off-site]/2} X 100%)) was calculated for each pair of split samples (see Table 1). For this data analysis, the split sample data were evaluated against an RPD criterion of 100%. This criterion was used by EPA Region IV at the Anniston, Alabama site (CHMM, 2000; USEPA Region IV, 2000). USEPA Region IV's data validation guidance does not specify a criterion for split sample precision, other than to note whether precision was acceptable, provisional, or unacceptable. The on-site laboratory data precision is acceptable (USEPA Region IV, 1999), except for a single instance where the RPD of split samples exceeded 100%.

4.2 Duplicate Samples

Table 2 presents the data for each duplicate sample pair analyzed by both the on-site laboratory and the off-site laboratory. On-site and off-site duplicate pair results were evaluated for precision using criteria presented for non-aqueous matrices in USEPA's Region I data validation guidelines (USEPA Region I, 1996). Region I's precision criterion is RPD $\leq$ 50% for non-aqueous duplicate results that are greater than

2 times the quantitation limit. For results less than 2 times the quantitation limit, if the difference between the results was less than the quantitation limit, the results were deemed to have demonstrated acceptable precision. This allows for evaluation of the results, taking into consideration the increased variability of data near the sample quantitation limit (USEPA Region I, 1996). For the on-site laboratory, 51 out of 52 duplicate pair analyses (98%) met RPD criteria. For the off-site laboratory, 52 out of 52 pairs (100%) also met RPD criteria.

4.3 Action Level Decisions

An important aspect of on-site laboratory is the ability to make decisions based on real-time analytical results. The performance of the on-site laboratory with respect to the action level of 1.0 mg/kg was excellent. In only one instance did the on-site laboratory detect PCBs above the action level and the off-site laboratory detect PCBs below the action level. The split sample result comparisons between the two labs showed excellent correlations.

4.4 Summary

Overall, the agreement between the results of the on-site laboratory and the off-site laboratory was excellent. This conclusion is based on the high correlations achieved in the regressions of on-site laboratory results *versus* off-site laboratory results, the accuracy in confirming the on-site laboratory results, the high precision attained by the on-site laboratory, and the virtual absence of significant QA/QC issues in the on-site and off-site laboratories throughout the remediation of the Brent Street properties.

5.0 References

CHMM. 2000. "Split Sampling Guideline for the Anniston PCB Site. Anniston, Calhoun County, Alabama." Prepared for USEPA Region IV. April 21.

U.S. Environmental Protection Agency (USEPA). 1995. "Field Analytical Screening Program: PCB Method." EPA/540/R-95/521. National Risk Management Research Laboratory (Cincinnati) and National Exposure Research Laboratory (Las Vegas), Office of Research and Development, USEPA. 37 p.

U.S. Environmental Protection Agency (USEPA). 1997. "SW 846."

U.S. Environmental Protection Agency Region I (USEPA Region I). 1996. "Region I, EPA-New England Data Validation Functional Guidelines for Evaluating Environmental Analyses." July, Revised December.

U.S. Environmental Protection Agency Region IV (USEPA Region IV). 1999. "Data Validation Standard Operating Procedures for Contract Laboratory Program Routine Analytical Services. Revision 2.1." July.

U.S. Environmental Protection Agency Region IV (USEPA Region IV). 2000. "Quality Assurance Project Plan for the Anniston PCB Site, Calhoun County, Aniston, Alabama. Region IV." January.

Figure 1
Comparison of On-Site and Off-Site PCB (Aroclor 1260) Results
January - May 2007
Brent Street Properties, Crystal Springs, MS

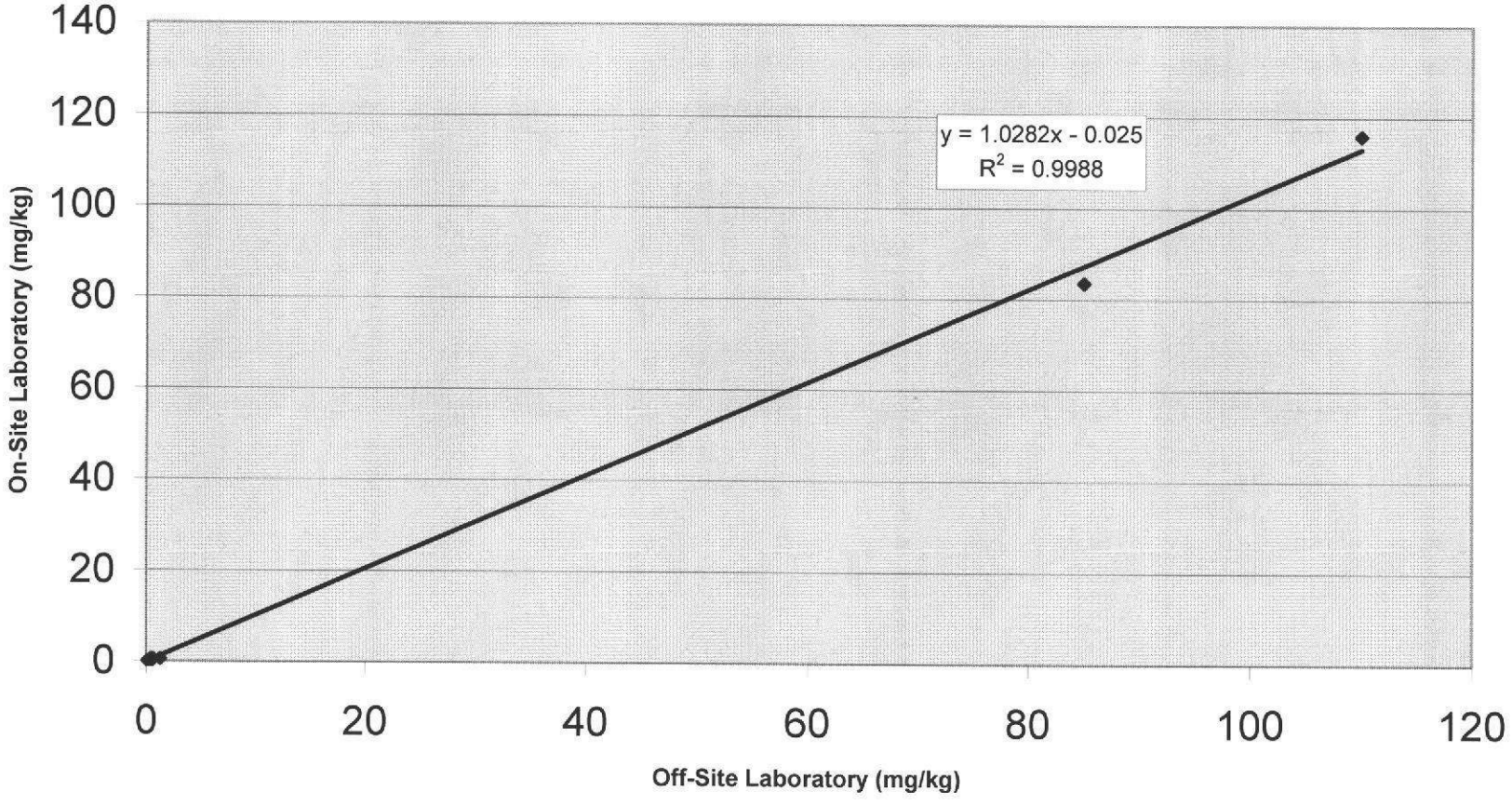


Table 1
Comparison of On-Site and Off-Site Laboratory Split Sample Analyses
Brent Street Remediation
January - May 2007

Sample Name	Sample Date	On-Site Laboratory Result (mg/Kg)		Off-Site Laboratory Result (mg/Kg)		Relative % Difference
MS1-EFS-001-001	1/30/2007	85.00		83.60		1.7
Duplicate-001-01/30/07	1/30/2007	110.00		116.00		-5.3
MS1-EFS-005-001	1/30/2007	0.10	u	0.11	U	-7.7
MS1-EFS-006-001	1/31/2007	0.10	u	0.10	U	-2.0
Duplicate-001-01/31/07	1/31/2007	0.10	u	0.09	U	7.6
MS1-EFS-017-001	2/12/2007	0.10	u	0.12	U	-16.5
Duplicate-001-02/12/07	2/12/2007	0.10	u	0.12	U	-16.5
MS1-EFS-018-001	2/13/2007	0.10	u	0.11	U	-9.5
Duplicate-001-02/13/07	2/13/2007	0.10	u	0.11	U	-7.7
MS1-EFS-022-001	2/14/2007	0.10	u	0.11	U	-7.7
Duplicate-001-02/14/07	2/14/2007	0.10	u	0.11	U	-4.9
MS1-EFS-024-001	2/15/2007	0.10	u	0.10	U	-3.9
Duplicate-001-02/15/07	2/15/2007	0.10	u	0.10	U	1.7
MS1-EFS-027-001	2/16/2007	0.11		0.10	U	11.9
Duplicate-001-02/16/07	2/16/2007	0.10	u	0.10	U	0.9
MS1-EFS-030-001	2/19/2007	0.10	u	0.11	U	-13.1
Duplicate-001-02/19/07	2/19/2007	0.10	u	0.11	U	-13.1
RLP-EFS-001-001	2/19/2007	0.10	u	0.11	U	-7.7
Duplicate-002-02/19/07	2/19/2007	0.10	u	0.10	U	-2.0
RLP-ESS-005-0	2/19/2007	0.10	u	0.11	U	-12.2
MS1-EFS-009-001	2/2/2007	0.10	u	0.11	U	-6.8
Duplicate-001-02/02/07	2/2/2007	0.10	u	0.10	U	-1.0
RLP-EFS-007-001	2/21/2007	0.10	u	0.11	U	-9.5
Duplicate-001-02/21/07	2/21/2007	0.10	u	0.11	U	-11.3
RLP-EFS-012-001	2/21/2007	0.10	u	0.11	U	-11.3
RLP-EFS-015-001	2/22/2007	0.12		0.10	U	17.2
Duplicate-002-02/22/07	2/22/2007	0.10	u	0.09	U	6.5
RLP-EFS-025-001	2/22/2007	0.10	u	0.11	U	-9.5
RLP-ESS-017-0	2/22/2007	0.10	u	0.10	U	0.4
RLP-ESS-032-0	2/22/2007	0.30		0.20		38.6
RLP-ESS-033-0	2/22/2007	0.16		0.12		30.2
MS1-EFS-032-001	2/26/2007	0.10	u	0.09	U	13.3
Duplicate-001-02/26/07	2/26/2007	0.10	u	0.10	U	-1.0

Table 1
Comparison of On-Site and Off-Site Laboratory Split Sample Analyses
Brent Street Remediation
January - May 2007

Sample Name	Sample Date	On-Site Laboratory Result (mg/Kg)		Off-Site Laboratory Result (mg/Kg)		Relative % Difference
MS1-EFS-037-001	2/26/2007	0.10	u	0.10	U	-3.0
MS1-EFS-038-001	2/27/2007	0.10	u	0.09	U	10.6
Duplicate-002-02/27/07	2/27/2007	0.10	u	0.11	U	-10.4
MS1-EFS-040-001	2/28/2007	0.10	u	0.11	U	-6.8
Duplicate-002-02/28/07	2/28/2007	0.10	u	0.11	U	-5.8
MS1-EFS-010-001	2/5/2007	0.10	u	0.11	U	-8.6
Duplicate-001-02/05/07	2/5/2007	0.10	u	0.11	U	-5.8
MS1-EFS-011-001	2/6/2007	0.10	u	0.11	U	-9.5
Duplicate-001-02/06/07	2/6/2007	0.10	u	0.11	U	-5.8
MS1-EFS-012-001	2/7/2007	0.10	u	0.10	U	0.3
Duplicate-001-02/07/07	2/7/2007	0.10	u	0.13		-27.6
MS1-EFS-014-001	2/8/2007	0.10	u	0.12	U	-14.0
Duplicate-002-02/08/07	2/8/2007	0.10	u	0.11	U	-5.8
MS2-EFS-022-001	3/12/2007	0.10	u	0.10	U	-1.0
Duplicate-001-03/12/07	3/12/2007	0.10	u	0.11	U	-8.6
MS2-EFS-027-001	3/13/2007	0.10	u	0.12	U	-14.0
Duplicate-002-03/13/07	3/13/2007	0.10	u	0.11	U	-13.1
MS2-EFS-031-001	3/16/2007	0.10	u	0.11	U	-12.2
Duplicate-001-03/16/07	3/16/2007	0.15		0.12	U	26.4
MS2-EFS-014-002	3/19/2007	0.10	u	0.11	U	-6.8
Duplicate-001-03/19/07	3/19/2007	0.10	u	0.12	U	-14.8
MS1-EFS-044-001	3/2/2007	0.10	u	0.15		-37.4
Duplicate001-03/02/07	3/2/2007	0.27		0.10	U	90.3
MS2-EFS-035-001	3/20/2007	0.10	u	0.09	U	10.3
Duplicate-001-03/20/07	3/20/2007	0.10	u	0.10	U	0.9
MS2-EFS-038-001	3/21/2007	0.27		0.15		59.6
Duplicate-001-03/21/07	3/21/2007	0.23		0.12		60.6
MS2-EFS-041-001	3/26/2007	0.48		0.18		90.9
Duplicate-001-03/26/07	3/26/2007	0.53		0.11	U	**129.7**
MS1-ESS-020-0	3/27/2007	0.10	u	0.12	U	-14.8
Duplicate-001-03/27/07	3/27/2007	0.10	u	0.12	U	-14.8
MS2-EFS-048-001	3/28/2007	0.10	u	0.10	U	4.1
Duplicate-001-03/28/07	3/28/2007	0.10	u	0.10	U	0.0

Table 1
Comparison of On-Site and Off-Site Laboratory Split Sample Analyses
Brent Street Remediation
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Sample Name	Sample Date	On-Site Laboratory Result (mg/Kg)		Off-Site Laboratory Result (mg/Kg)		Relative % Difference
MS2-EFS-052-001	3/29/2007	0.10	u	0.09	U	5.5
Duplicate-001-03/29/07	3/29/2007	0.10	u	0.09	U	7.4
MS2-EFS-056-001	3/30/2007	0.10	u	0.09	U	6.6
Duplicate-001-03/30/07	3/30/2007	0.10	u	0.09	U	7.7
MS1-EFS-046-001	3/5/2007	0.10	u	0.11	U	-6.8
Duplicate-001-03/05/07	3/5/2007	0.10	u	0.11	U	-5.8
MS2-EFS-001-001	3/6/2007	0.10	u	0.10	U	3.1
Duplicate-001-03/06/07	3/6/2007	0.10	u	0.10	U	2.1
MS2-EFS-008-001	3/7/2007	0.10	u	0.10	U	4.0
Duplicate-001-03/07/07	3/7/2007	0.10	u	0.09	U	5.9
MS2-EFS-013-001	3/8/2007	0.10	u	0.09	U	7.7
Duplicate-001-03/08/07	3/8/2007	0.10	u	0.10	U	1.7
MS2-EFS-017-001	3/9/2007	0.10	u	0.10	U	1.7
Duplicate-001-03/09/07	3/9/2007	0.10	u	0.10	U	0.0
MS2-EFS-021-001	3/9/2007	**1.30**		**0.54**		**82.9**
MS2-EFS-064-001	4/11/2007	0.10	u	0.12	U	-20.6
Duplicate-001-04/11/07	4/11/2007	0.10	u	0.12	U	-20.6
MS2-EFS-069-001	4/16/2007	0.10	u	0.12	U	-18.2
Duplciate-001-04/16/07	4/16/2007	0.10	u	0.12	U	-18.2
MS2-EFS-075-001	4/19/2007	0.15		0.12	U	22.2
Duplicate-001-04/19/07	4/19/2007	0.15		0.12	U	22.2
MS2-ESS-025-0	4/2/2007	0.10	u	0.11	U	-5.8
Duplicate-001-04/02/07	4/2/2007	0.10	u	0.11	U	-5.8
MS2-EFS-081-001	4/20/2007	0.10	u	0.12	U	-14.8
Duplicate-001-04/20/07	4/20/2007	0.10	u	0.12	U	-15.7
MS2-EFS-084-001	4/23/2007	0.10	u	0.11	U	-7.7
Duplicate-001-04/23/07	4/23/2007	0.10	u	0.11	U	-9.5
MS2-EFS-091-001	4/24/2007	0.10	u	0.11	U	-9.5
Duplicate-001-04/24/07	4/24/2007	0.10	u	0.11	U	-6.8
MS2-EFS-093-001	4/25/2007	0.16		0.10	U	42.4
Duplicate-001-04/25/07	4/25/2007	0.16		0.14		10.5
MS2-ESS-031-0	4/27/2007	0.10	u	0.12	U	-19.8
Duplicate-001-04/27/07	4/27/2007	0.10	u	0.13	U	-23.0

Table 1
Comparison of On-Site and Off-Site Laboratory Split Sample Analyses
Brent Street Remediation
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Sample Name	Sample Date	On-Site Laboratory Result (mg/Kg)		Off-Site Laboratory Result (mg/Kg)		Relative % Difference
MS2-EFS-058-001	4/3/2007	0.10	u	0.09	U	5.9
Duplicate-001-04/03/07	4/3/2007	0.10	u	0.10	U	4.7
MS2-EFS-098-001	4/30/2007	0.10	u	0.09	U	7.5
Duplicate-001-04/30/07	4/30/2007	0.10	u	0.10	U	3.3
MS2-EFS-106-001	4/30/2007	0.10	u	0.11	U	-7.7
MS2-EFS-062-001	4/5/2007	0.10	u	0.10	U	0.0
Duplicate-001-04/05/07	4/5/2007	0.10	u	0.10	U	-3.9
MS2-EFS-109-001	5/1/2007	0.10	u	0.09	U	5.2
Duplicate-001-05/01/07	5/1/2007	0.10	u	0.10	U	1.5
MS2-ESS-038-0	5/2/2007	0.42		0.50		-17.8
Duplicate-001-05/02/07	5/2/2007	0.61		0.53		14.4
MS2-EFS-015-004	5/3/2007	0.10	u	0.11	U	-4.9
MS2-EFS-031-002	5/3/2007	0.10	u	0.10	U	-3.0
Duplicate-001-05/03/07	5/3/2007	0.10	u	0.11	U	-5.8
MS2-EFS-032-005	5/3/2007	0.10	u	0.11	U	-5.8
MS2-EFS-034-003	5/3/2007	0.10	u	0.11	U	-5.8
MS2-EFS-004-004	5/4/2007	0.10	u	0.10	U	-3.0
MS2-EFS-033-002	5/4/2007	0.10	u	0.10	U	-3.9
Duplicate-001-05/04/07	5/4/2007	0.10	u	0.11	U	-6.8

Table 2
Comparison of Blind Duplicate Sample Analyses for the On-Site and Off-Site Laboratories
Brent Street Remediation
January - May 2007

Sample Name	Duplicate	Sample Date	On-Site Laboratory Result (mg/Kg)		On-Site Laboratory Duplicate Result (mg/Kg)		Relative % Difference	Off-Site Laboratory Result (mg/Kg)		Off-Site Laboratory Duplicate Result (mg/Kg)		Relative % Difference
MS1-EFS-001-001	Duplicate 001 - 01/30/07	1/30/2007	85.00		110.00		-25.6	83.60		116.00		-32.5
MS1-EFS-006-001	Duplicate 001- 01/31/07	1/31/2007	0.10	u	0.10	u	0.0	0.10	U	0.09	U	9.6
MS1-EFS-009-001	Duplicate 001-02/02/07	2/2/2007	0.10	u	0.10	u	0.0	0.11	U	0.10	U	5.8
MS1-EFS-010-001	Duplicate 001-02/05/07	2/5/2007	0.10	u	0.10	u	0.0	0.11	U	0.11	U	2.8
MS1-EFS-011-001	Duplicate 001-02/06/07	2/6/2007	0.10	u	0.10	u	0.0	0.11	U	0.11	U	3.7
MS1-EFS-012-001	Duplicate 001-02/07/07	2/7/2007	0.10	u	0.10	u	0.0	0.10	U	0.13		-27.9
MS1-EFS-014-001	Duplicate 002-02/08/07	2/8/2007	0.10	u	0.10	u	0.0	0.12	U	0.11	U	8.1
MS1-EFS-017-001	Duplicate 001-02/12/07	2/12/2007	0.10	u	0.10	u	0.0	0.12	U	0.12	U	0.0
MS1-EFS-018-001	Duplicate 001-02/13/07	2/13/2007	0.10	u	0.10	u	0.0	0.11	U	0.11	U	1.8
MS1-EFS-022-001	Duplicate -001-02/14/07	2/14/2007	0.10	u	0.10	u	0.0	0.11	U	0.11	U	2.8
MS1-EFS-024-001	Duplicate -001-02/15/07	2/15/2007	0.10	u	0.10	u	0.0	0.10	U	0.10	U	5.6
MS1-EFS-027-001	Duplicate-001-02/16/07	2/16/2007	0.11		0.10	u	9.5	0.10	U	0.10	U	-1.5
MS1-EFS-030-001	Duplicate-001-02/19/07	2/19/2007	0.10	u	0.10	u	0.0	0.11	U	0.11	U	0.0
MS1-EFS-032-001	Duplicate-001-02/26/07	2/26/2007	0.10	u	0.10	u	0.0	0.09	U	0.10	U	-14.3
MS1-EFS-038-001	Duplicate-002-02/27/07	2/27/2007	0.10	u	0.10	u	0.0	0.09	U	0.11	U	-21.0
MS1-EFS-040-001	Duplicate 002-02/28/07	2/28/2007	0.10	u	0.10	u	0.0	0.11	U	0.11	U	0.9
MS1-EFS-044-001	Duplicate 001-03/02/07	3/2/2007	0.10	u	0.27		-91.9	0.15		0.10	U	35.5
MS1-EFS-046-001	Duplicate 001-03/05/07	3/5/2007	0.10	u	0.10	u	0.0	0.11	U	0.11	U	0.9
MS1-ESS-020-0	Duplicate 001-03/27/07	3/27/2007	0.10	u	0.10	u	0.0	0.12	U	0.12	U	0.0
MS2-EFS-001-001	Duplicate 001-03/06/07	3/6/2007	0.10	u	0.10	u	0.0	0.10	U	0.10	U	-1.0
MS2-EFS-008-001	Duplicate-001-03/07/07	3/7/2007	0.10	u	0.10	u	0.0	0.10	U	0.09	U	1.9
MS2-EFS-013-001	Duplicate-001-03/08/07	3/8/2007	0.10	u	0.10	u	0.0	0.09	U	0.10	U	-6.0
MS2-EFS-014-002	Duplicate-002-03/19/07	3/19/2007	0.10	u	0.10	u	0.0	0.11	U	0.12	U	-8.1
MS2-EFS-017-001	Duplciate-001-03/09/07	3/9/2007	0.10	u	0.10	u	0.0	0.10	U	0.10	U	-1.7
MS2-EFS-022-001	Duplicate-001-03/12/07	3/12/2007	0.10	u	0.10	u	0.0	0.10	U	0.11	U	-7.6
MS2-EFS-027-001	Duplicate-002-03/13/07	3/13/2007	0.10	u	0.10	u	0.0	0.12	U	0.11	U	0.9
MS2-EFS-031-001	Duplicate-001-03/16/07	3/16/2007	0.10	u	0.15		-40.0	0.11	U	0.12	U	-1.8
MS2-EFS-031-002	Duplicate-001-05/03/07	5/3/2007	0.10	u	0.10	u	0.0	0.10	U	0.11	U	-2.9
MS2-EFS-033-002	Duplicate-001-05/04/07	5/4/2007	0.10	u	0.10	u	0.0	0.10	U	0.11	U	-2.8
MS2-EFS-035-001	Duplciate-001-03/20/07	3/20/2007	0.10	u	0.10	u	0.0	0.09	U	0.10	U	-9.4
MS2-EFS-038-001	Duplicate-001-03/21/07	3/21/2007	0.27		0.23		16.0	0.15		0.12		17.1
MS2-EFS-041-001	Duplicate-001-03/26/07	3/26/2007	0.48		0.53		-9.9	0.18		0.11	U	45.7
MS2-EFS-048-001	Duplicate-001-03/28/07	3/28/2007	0.10	u	0.10	u	0.0	0.10	U	0.10	U	-4.1

Table 2
Comparison of Blind Duplicate Sample Analyses for the On-Site and Off-Site Laboratories
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Sample Name	Duplicate	Sample Date	On-Site Laboratory Result (mg/Kg)		On-Site Laboratory Duplicate Result (mg/Kg)		Relative % Difference	Off-Site Laboratory Result (mg/Kg)		Off-Site Laboratory Duplicate Result (mg/Kg)		Relative % Difference
MS2-EFS-052-001	Duplicate-001-03/29/07	3/29/2007	0.10	u	0.10	u	0.0	0.09	U	0.09	U	1.8
MS2-EFS-056-001	Duplicate-001-03/30/07	3/30/2007	0.10	u	0.10	u	0.0	0.09	U	0.09	U	1.1
MS2-EFS-058-001	Duplciate-001-04/03/07	4/3/2007	0.10	u	0.10	u	0.0	0.09	U	0.10	U	-1.2
MS2-EFS-062-001	Duplicate-001-04/05/07	4/5/2007	0.10	u	0.10	u	0.0	0.10	U	0.10	U	-3.9
MS2-EFS-064-001	Duplicate-001-04/11/07	4/11/2007	0.10	u	0.10	u	0.0	0.12	U	0.12	U	0.0
MS2-EFS-069-001	Duplicate-001-04/16/07	4/16/2007	0.10	u	0.10	u	0.0	0.12	U	0.12	U	0.0
MS2-EFS-075-001	Duplicate-001-04/19/07	4/19/2007	0.15		0.15		0.0	0.12	U	0.12	U	0.0
MS2-EFS-081-001	Duplicate-001-04/20/07	4/20/2007	0.10	u	0.10	u	0.0	0.12	U	0.12	U	-0.9
MS2-EFS-084-001	Duplicate-001-04/23/07	4/23/2007	0.10	u	0.10	u	0.0	0.11	U	0.11	U	-1.8
MS2-EFS-091-001	Duplicate-001-04/24/07	4/24/2007	0.10	u	0.10	u	0.0	0.11	U	0.11	U	2.8
MS2-EFS-093-001	Duplicate-001-04/25/07	4/25/2007	0.16		0.16		0.0	0.10	U	0.14		-32.3
MS2-EFS-098-001	Duplicate-001-04/30/07	4/30/2007	0.10	u	0.10	u	0.0	0.09	U	0.10	U	-4.2
MS2-EFS-109-001	Duplicate-001-05/01/07	5/1/2007	0.10	u	0.10	u	0.0	0.09	U	0.10	U	-3.7
MS2-ESS-025-0	Duplicate-001-04/02/07	4/2/2007	0.10	u	0.10	u	0.0	0.11	U	0.11	U	0.0
MS2-ESS-031-0	Duplicate-001-04/27/07	4/27/2007	0.10	u	0.10	u	0.0	0.12	U	0.13	U	-3.2
MS2-ESS-038-0	Duplicate-001-05/02/07	5/2/2007	0.42		0.61		-36.9	0.50		0.53		-5.0
RLP-EFS-001-001	Duplicate-001-02/19/07	2/19/2007	0.10	u	0.10	u	0.0	0.11	U	0.10	U	5.7
RLP-EFS-007-001	Duplicate-001-02/21/07	2/21/2007	0.10	u	0.10	u	0.0	0.11	U	0.11	U	-1.8
RLP-EFS-015-001	Duplicate-001-02/22/07	2/22/2007	0.12		0.10	u	18.2	0.10	U	0.09	U	7.5