REVISED SOIL REMOVAL PLAN

AKT Gravel Pit
Crystal Springs, Mississippi

Prepared for:

Kuhlman Electric Corporation
101 Kuhlman Drive
Crystal Springs, Mississippi 39059

IT CORPORATION
A Member of The IT Group

Prepared by:

IT Corporation
11560 Great Oaks Way
Alpharetta, Georgia 30022

July 24, 2001

Project No. 820327

FILE COPY

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11560 Great Oaks Way, Suite 500
Alpharetta, Georgia 30022-2424

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Kent Geis
Project Manager

IT Corporation

A. Robert Thompson
Operations Manager

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1.0 Introduction

This work plan describes the activities proposed to remove soil containing polychlorinated biphenyls (PCBs) placed at the AKT gravel pit in Crystal Springs, Mississippi. The soil came from the nearby Kuhlman Electric Company (KEC) facility and was placed in the AKT gravel pit before it was learned that the soil may contain PCBs.

This plan is being submitted consistent with the Self-implementing On-site Cleanup and Disposal of PCB Remediation Waste regulations under 40 Code of Federal Regulations (CFR) 761.61(a) with a very minor variance for soil sampling density. This plan presents the nature of the contamination; a summary of the investigation procedures; the location and extent of the soil containing PCBs; the cleanup plan; and certification of the characterization information. To achieve a complete cleanup, KEC has elected to remove soil with PCB concentrations greater than 1 milligram per kilogram (mg/kg) for off-site disposal at appropriate facilities. With this submittal, written approval to implement this plan is requested from the Mississippi Department of Environmental Quality (MDEQ) and the United States Environmental Protection Agency (EPA) Region IV.

This work plan has been revised with additional soil data. The original soil removal plan is dated April 19, 2001. The regulatory review of that plan resulted in collection of additional soil data to better define the extent of soil regulated by the Toxic Substance Control Act (TSCA) under 40 CFR 761.

2.0 Site Background

During building-expansion at KEC, excess soil was transported to the AKT gravel pit in Crystal Springs, Mississippi for fill material. After transporting and placing the fill, it was determined that the soil may contain PCBs. Figure 1 presents the location of the AKT gravel pit and Figure 2 shows the approximate dimensions of the filled excavation. Specific information on the gravel pit's dimensions and the volume of fill material placed in the gravel pit are as follows:

- The open excavation at the AKT gravel pit, prior to being filled, has been described as being up to 12 feet deep and measuring about 315 feet long and 70 feet wide. This excavation volume equals approximately 9,800 cubic yards (cy).

- Limited information suggests that 33 dump truck loads of fill soil from the KEC facility may have been deposited at AKT. At an assumed volume of 18 yards per truck, the quantity of soil brought from KEC would equal approximately 600 cy.

Currently, the ground surface at the AKT gravel pit is generally level and sparsely vegetated with grass. A safety fence has been erected around the fill area to prevent contact with potentially affect soil. Further information concerning the project site can be found in the Site Assessment Report.

KEC contracted with IT Corporation to conduct a site assessment of the AKT gravel pit. This report was submitted to MDEQ and the EPA on March 6, 2001. The Site Assessment Report presented specific information and results compiled from field sampling and analysis activities conducted at the AKT gravel pit. This revised soil removal work plan presents additional data from a subsequent soil sampling and analysis effort.

3.0 Investigation Procedures

A revised Site Assessment Work Plan was submitted to MDEQ and the EPA on December 1, 2000 for the investigation of the AKT gravel pit. The revised Site Assessment Work Plan presented detailed procedures for drilling, soil sample collection, analytical methods, and data analysis methods. Provided below is a summary of the assessment work plan.

3.1 Soil Sampling

Initial Sampling

The initial soil sampling conducted at the AKT gravel pit included the collection of surface and subsurface soil samples for chemical analysis from 76 soil borings. The initial sampling efforts were conducted during December 2000 and March 2001. The soil boring locations were determined by constructing 25-foot-by-25-foot grid over the former gravel pit. Additional boring locations were selected after receiving initial soil results. The gridlines trending northwest to southeast were assigned designations alphabetically, while the northeast-southwest trending gridlines were designated numerically. Soil boring locations were then placed at the gridline intersections and given an alphanumeric designation. Grid nodes were measured relative to site benchmarks. Soil boring locations and grid nodes are shown on Figure 3.

IT contracted with a direct-push technology subcontractor to assist in the collection of the soil samples. The soil borings were advanced to 20 feet below ground surface (bgs) and soil samples were collected using direct-push sampling procedures. Push refusal occurred at some locations prior to reaching a depth of 20 feet bgs. More than 1,500 samples were collected. Surface soil samples were collected by first removing the surface debris such as rocks and vegetation from the immediate sample area. After the samples were collected from the surface, a sample was collected for each foot of soil below the ground's surface. These samples were collected by homogenizing a 1-foot interval of soil, then collecting a portion of the soil for analysis. Samples identified as a specific foot interval represent the soil at that depth and the 12 inches above the identified depth.

To identify the general location of the soil containing PCBs, an analysis of the samples was performed from each boring at the surface and at 4-foot, 8-foot, and 12-foot sample intervals. Additional sample intervals were analyzed for borings where PCBs were detected until the concentration of PCBs was less than 1 milligram per kilogram (mg/kg).

A Soil Removal Plan was developed in April 2001. Specific Areas of Excavations (AOEs) were identified where soil would be removed for disposal. The limits of excavation for each AOE were based on halfway (12.5-feet) between two grids nodes where one node had PCB soil concentrations

greater than 50 mg/kg and the other was had PCB soil concentrations less than 50 mg/kg. Table 1 identifies the original AOEs and the planned excavation depths.

Final Sampling

A final sampling effort was undertaken in June 2001, based on regulatory comments on the Soil Removal Plan developed in April 2001. The purpose of the additional sampling was to refine the boundary of the excavations for soil with PCB concentrations greater than 50 mg/kg. Three new soil sampling locations were established between any two grids locations where at one location the PCB concentration was greater than 50 mg/kg and the other location the PCB's concentrations were less than 50 mg/kg. The grid nodes are 25 feet apart so the locations between the nodes are at 6.25-feet, 12.5-feet, and 18.75-feet. The 105 additional sampling locations are presented in Figure 4. At each location, composite soil samples were collected from specific depth ranges based on results of the initial sampling efforts. Table 2 presents the sample depths based on the former AOE concept.

The analysis of samples was performed in phases. The samples half-way (12.5-feet) between the grid nodes were analyzed first. If the PCB concentration was more than 50 mg/kg, the sample from next further out location (e.g. 18.75-feet) was analyzed. If the PCB concentration was less than 50 mg/kg, the sample from next closest in location (e.g. 6.25-feet) was analyzed.

3.2 Data Quality

Data quality objectives (DQOs) were established in the Site Assessment Work Plan at DQO Level 3 for collection and analysis. The Laboratory Assurance/Quality Control Report is included in Appendix C of the Site Assessment Report. All analytical results from all sampling efforts are provided under separate cover.

Select soil samples from each boring were analyzed for PCBs using EPA Method 8082. Twelve soil samples were selected for analyses for the following parameters:

- Polynuclear aromatic hydrocarbons (PAHs) according to EPA Method 8270C
- Silver according to EPA Method 6010B
- Total Cyanide according to EPA Method 9012A

4.0 Investigation Results

The analytical results of the analyses of soil samples collected at the AKT gravel pit indicated that PCBs were detected in elevated levels. Soil analytical results are presented in Tables 3, 4, and 5. The data has been grouped into the three depth ranges used for the final sampling effort. Figures 5, 6, and 7 identify the soil to be removed based on the PCB concentration. Two sets of Figures 5, 6 and 7 are included. One set presents the excavations on a large scale. The second set is on clear sheets to depict the excavation vertically (Note: Due to scale changes, the excavation at C13 is not presented on the clear sheets). As presented on the figures, certain soil has PCB concentrations less than 1 mg/kg, so it can remain on-site, but must be excavated to access deeper soils designated for off-site disposal.

The limits of excavation for soil to be shipped to a TSCA approved (Subtitle C) landfill is shown in red on Figures 5, 6, 7. Within this area, the soil samples had PCB concentrations greater than 50 mg/kg. However, the excavation limits are bounded by sampling locations where the concentration was less than 50 mg/kg. Certain locations had PCB soil concentration less than 50 mg/kg, but the soil associated with those location will be removed for Subtitle C disposal since the areas are small and segregation is not practical.

The limits of excavation for soil to be shipped to a Subtitle D landfill is shown in blue on Figures 5, 6, and 7. The excavation limits are halfway between a grid node with a PCB concentration greater than 1 mg/kg and a grid node with a PCB concentration less than 1 mg/kg.

Soil to be removed for use as fill is shown in green on Figures 5, 6, and 7. The soil will be removed and stockpiled prior to being used as fill. Stockpile soil samples will be collected and analyzed to verify the soil has less than 1 mg/kg PCBs, prior to being used as fill. If stockpiled soil is greater than 1 mg/kg, the soil will be shipped off-site for Subtitle D or Subtitle C disposal.

5.0 Removal and Disposal Plan

The soil containing >1 mg/kg PCBs will be excavated from the AKT gravel pit and transported off-site for disposal. The excavation will be performed based on the lines and grades determined during the site assessment. Soil disposal will be based on the PCB concentration of the excavated soil. Soil with PCB concentrations above 50 mg/kg will go to a Subtitle C (TSCA approved) facility. Soil with PCB concentrations below 50 mg/kg and above 1 mg/kg will go to a Subtitle D facility. Presented below are the details of the removal and disposal plan.

5.1 Excavation

The areas to be excavated will be clearly marked using spray paint and string lines. The Site Manager will be on-site during the excavation with a primary focus to ensure the excavation lines and grades are clearly identified and maintained.

The soil will be removed by an excavator and placed in one of three on-site stockpiles, based on the PCB concentration of the area being excavated. The excavator will work across the site three times. The first pass will remove soil in the upper two feet. The second pass will remove soil from 2-feet to the designated bottom of the excavation, for all soil except in the area of A8, B8, C8 and C9. In the A8, B8, C8 and C9 area, the second pass of the excavator will remove only the soil from 2-feet to 4-feet, as the deeper soil has different disposal designations. The third pass will remove soil from 4-feet to the designated bottom in the A8, B8, C8 and C9 area.

The excavator bucket will be completely emptied before handling soils of different disposal classification. Also, the excavator operator will minimize the number of changes between different areas. Decontamination with water is not planned until the equipment is to be shipped off-site.

To facilitate the removal of material from the site, a temporary roadway may need to be constructed to provide transport trucks with access to the work zone. This material may be composed of on-site soil or clean backfill, depending on the location of the excavation. IT will establish site traffic patterns to minimize any adverse impact to the surrounding area, while also providing the most efficient transport vehicles with access to the stockpiling/loading operation.

5.2 Confirmation Sampling

Michigan Department of Natural Resources Guidance Document for Verification of Soil Remediation guidelines will be used for determining the appropriate number of confirmation samples collected in the excavated areas. The excavation confirmation samples will be collected from the excavation floor and sidewalls. For this size of excavation, samples will be collected for every 500 square feet of

excavation floor and every 45 linear feet of sidewall. A minimum of four sidewall and two floor samples will be collected on any standalone excavations. The samples will be analyzed for PCBs in accordance with EPA SW846 Method 8082. Approximately 40 floor samples and 40 sidewall samples will be collected. One duplicate sample will be collected for every 10 samples.

Samples will be collected, when possible, using stainless steel auger buckets. At a few locations where the excavation is deepest, the sample will be collected from the excavator bucket to avoid placing a person in a deep excavation. Sample locations and sample identifications will be recorded on the site excavation drawings by the site chemist. If confirmation samples are above the action levels, then an additional 6-inches of soil will be excavated and the soil re-sampled. The excavation areas will not be backfilled until the site chemist has reviewed the data and approved the action.

5.3 Stockpiling

Three stockpile locations will be developed on the site. Of the three stockpiles, two will be lined with 8-mil-polyethylene sheeting for off-site disposal soil. The unlined stockpile will be composed of material that needs to be removed to allow access to the soil containing PCBs (less than 1 mg/kg PCB). The two stockpiles mentioned above will be lined and bermed to control/prevent run-on and run-off from storm water events. The stockpiles will be covered with the same material and secured nightly and/or during inclement weather. The size and height of each stockpile will be dependent upon conditions at the site and the quantity of the excavated soil. Upon completion of the project, each liner will be disposed of in the same manner as the soil with which it was associated.

5.4 Transportation and Disposal

IT has identified the following waste streams:

- TSCA regulated soil with PCB concentrations greater than 50 mg/kg will be transported to a Subtitle C landfill.
- Soil with PCB concentrations between 50 mg/kg and 1 mg/kg will be transported to a Subtitle D landfill.
- Decontamination water and used site personnel protective equipment, including liners and trash will be transported to a Subtitle C landfill.

IT will ensure that the project waste streams are properly classified for proper transportation and disposal of soil under applicable state and federal regulations.

A track excavator will load the transport vehicles after completing the excavation of all designated grids. Trailers will be positioned as close to the stockpiles as practical to reduce the movement of equipment and the potential for migration of contaminated soil.

All exit and entry onto the site will be through established gates. All soil transporters leaving the site will exit at site controlled rights-of-way. IT will maintain a traffic pattern around the site that will minimize any adverse impact to the area. Traffic speeds will be in accordance with county, local, state and federal regulations and will generally be at least 5 miles per hour (mph) below posted speed limits on public roads located within a 1-mile radius of the site. To minimize the generation of dust, speeds will not exceed 15 mph on all site access roads, haul routes, and exposed surfaces.

Dust control measures will be employed throughout the work site, if needed, to minimize the creation of dust during the work, and prevent the formation of fugitive particulate emissions at the property line, especially during excavation, stockpiling, and load-out activities.

Only qualified transporters will be selected to remove soil from the site based on the project waste types and the transporters past performance. Compliance will be maintained with regulations issued by the state, the EPA, the Resource Conservation and Recovery Act (RCRA), and the United States Department of Transportation (USDOT), including verification of the transporters' insurance and permits for the waste type.

All necessary documentation required for the shipment of waste off-site will have client approval and appropriate signatures. The above-referenced documentation may include bills of lading, hazardous and non-hazardous waste manifests, and land disposal restrictions (LDR).

5.5 Backfill

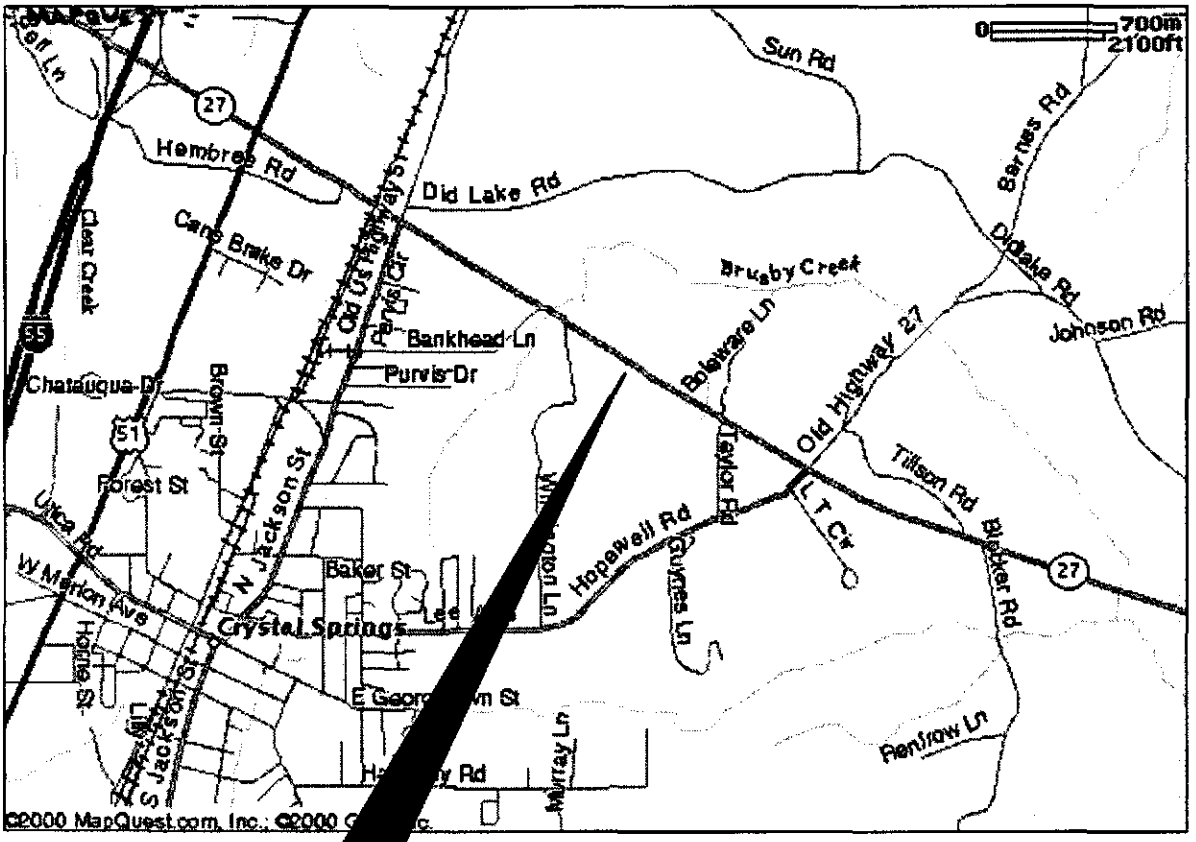
Backfill material will be placed in the appropriate excavated areas after soil containing PCBs has been removed as described above. Other portions of the AKT gravel pit will serve as the source of the backfill material. The source of the backfill material will be tested for PCBs. If no PCBs are found, the backfill material will be excavated, loaded onto trucks and transported to the site. Backfill will be placed in each excavation area using a small dozer. The backfill will be worked into the deepest excavation in 12-inch lifts where it will also be compacted. Compaction will be accomplished using heavy equipment located on-site. No density requirements or testing is anticipated. Backfilling will continue throughout the site until final site grades have been achieved. Final site grades will ensure the proper drainage from the project site. After final grading, the project site and disturbed areas will be seeded with rye grass.

6.0 Certification

KEC and the remediation contractor hereby certify that all sampling plans, sample collection procedures, sample preparation procedures and instrumental/chemical analyses procedures used to assess or characterize PCB contamination at this project site are on file at KEC in Crystal Springs, Mississippi, and are available for EPA inspection.

Kuhlman Electric Corporation

IT Corporation



IT CORPORATION
11560 GREAT OAKS WAY
SUITE 500
ALPHARETTA, GA 30022-2424
(770) 475-8994

SITE VICINITY MAP

CLIENT: KUHLMAN ELECTRIC CORPORATION

DATE: 7-23-01

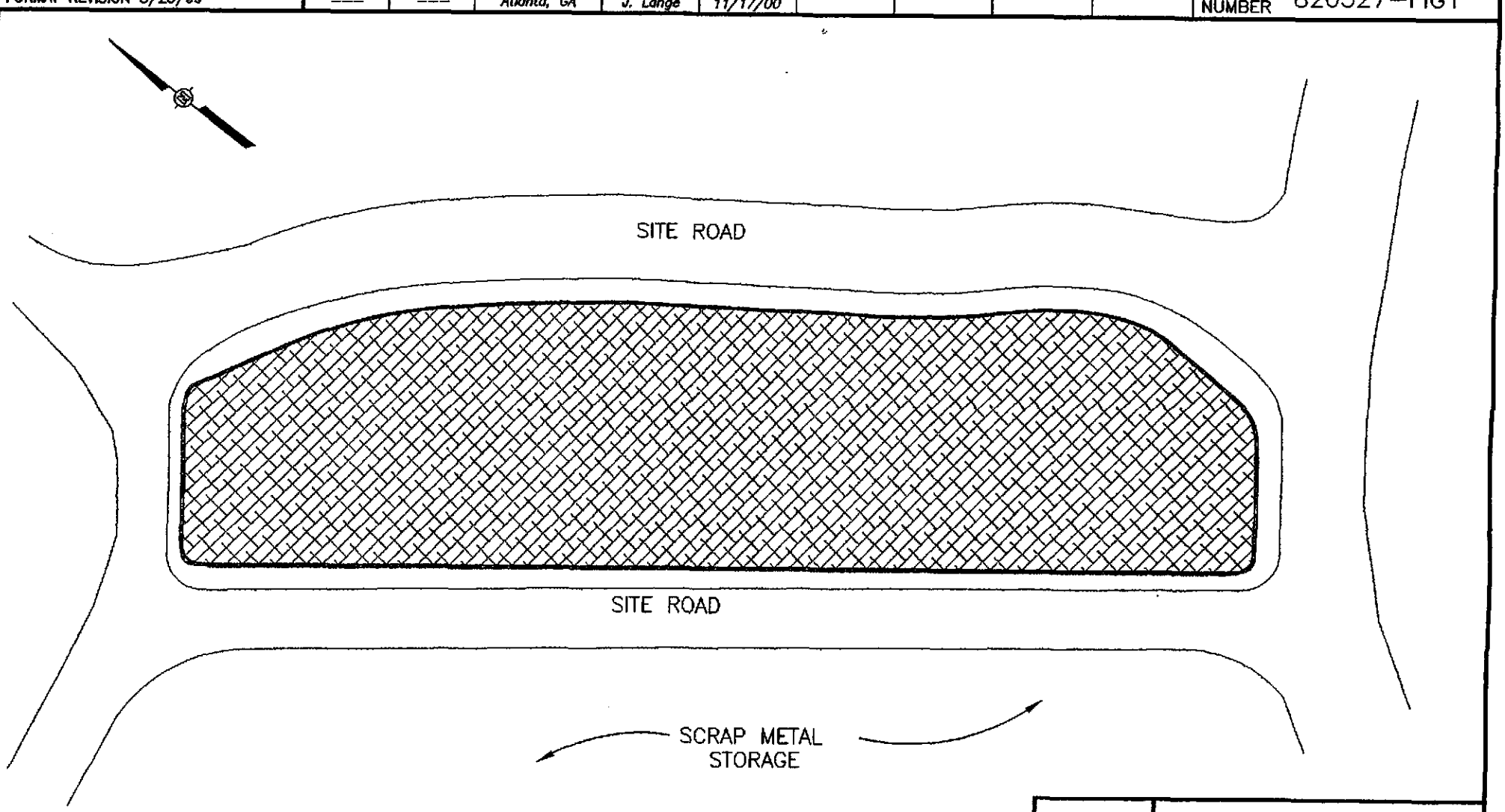
LOCATION: AKT GRAVEL PIT
CRYSTAL SPRINGS, MISSISSIPPI

FIGURE: 1

0327QUAD

PLOT DATE: ?/?/99
FORMAT REVISION 3/25/99

IMAGE	X-REF	OFFICE	DRAWN BY		CHECKED BY		APPROVED BY		DRAWING NUMBER
---	---	Atlanta, GA	J. Lange	11/17/00					820327-FIG1



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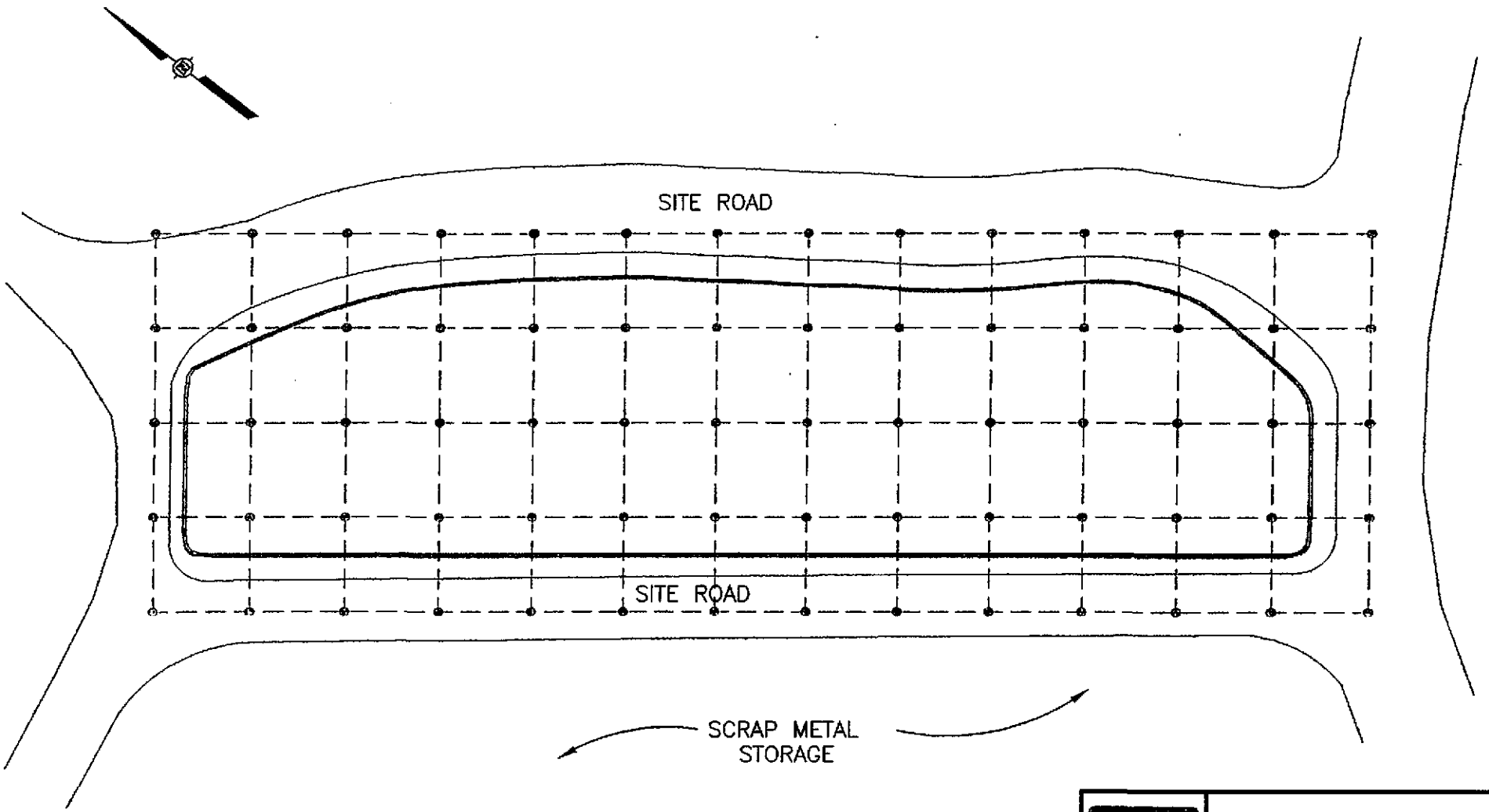
KUHLMAN ELECTRIC CORPORATION
CRYSTAL SPRINGS, MISSISSIPPI

FIGURE 2

AKT FILL AREA

PLOT DATE: ?/?/99
FORMAT REVISION 3/25/99

IMAGE	X-REF	OFFICE	DRAWN BY		CHECKED BY		APPROVED BY		DRAWING NUMBER
---	---	*Atlanta, GA*	*J. Lange*	*11/17/00*					820327-FIG3



LEGEND

- SOIL BORING LOCATION
- 25 ft. GRID
- APPROXIMATE FILL LOCATION
- SITE ROADS

SCALE
0 40 80 FEET

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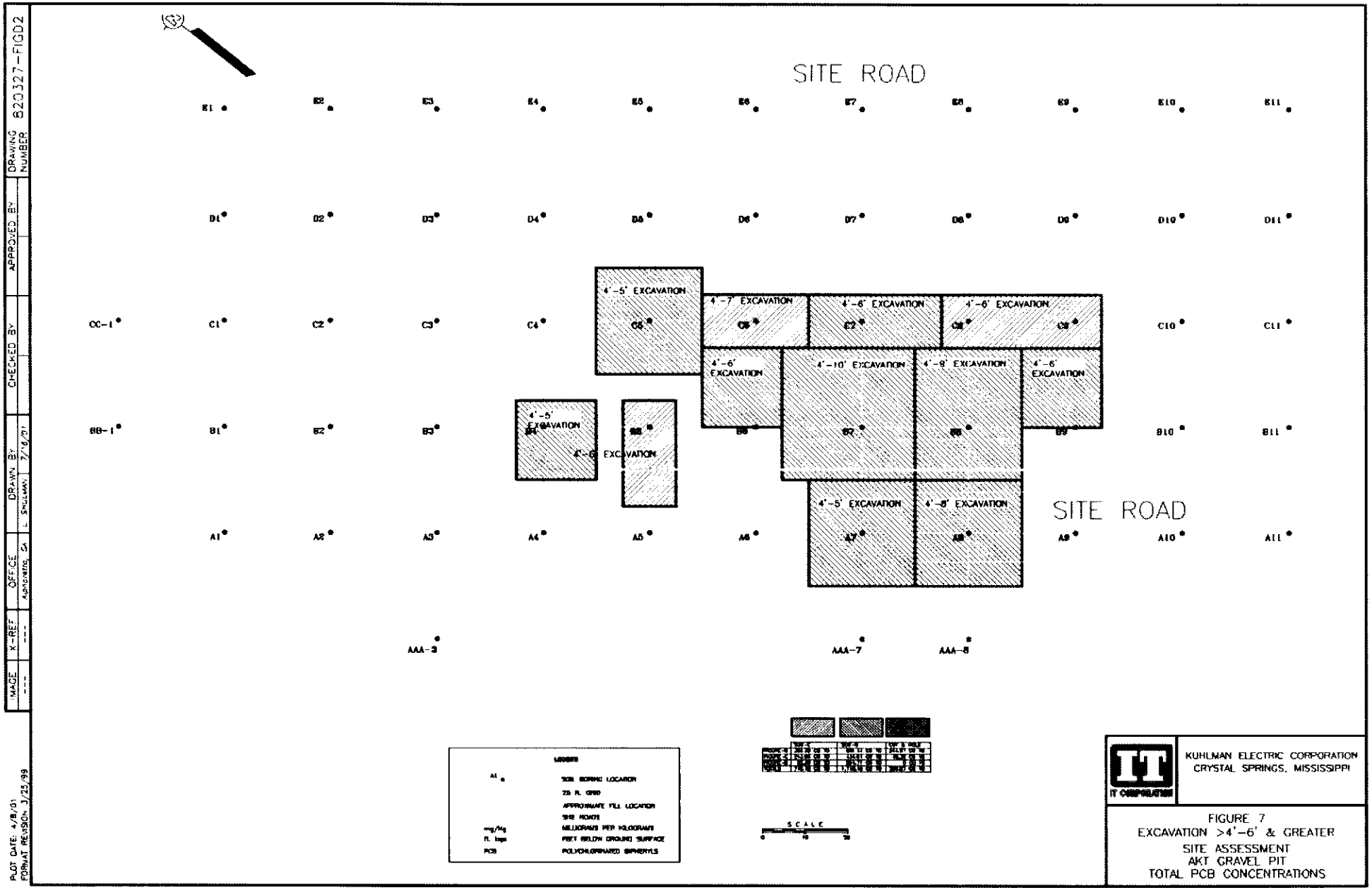
CRYSTAL SPRINGS, MISSISSIPPI

FIGURE 3

AKT FILL AREA GRID MAP


SITE ROAD
4'-5' EXCAVATION
4'-7' EXCAVATION
4'-6' EXCAVATION
4'-6' EXCAVATION
4'-6' EXCAVATION
4'-10' EXCAVATION
4'-9' EXCAVATION
4'-6' EXCAVATION
4'-5' EXCAVATION
4'-6' EXCAVATION
4'-5' EXCAVATION
4'-6' EXCAVATION
SITE ROAD
AAA-3
AAA-7
AAA-8
SCALE
KUHLMAN ELECTRIC CORPORATION
CRYSTAL SPRINGS, MISSISSIPPI
FIGURE 7
EXCAVATION >4'-6' & GREATER
SITE ASSESSMENT
AKT GRAVEL PIT
TOTAL PCB CONCENTRATIONS
820327-FIG02
PLOT DATE: 4/8/01
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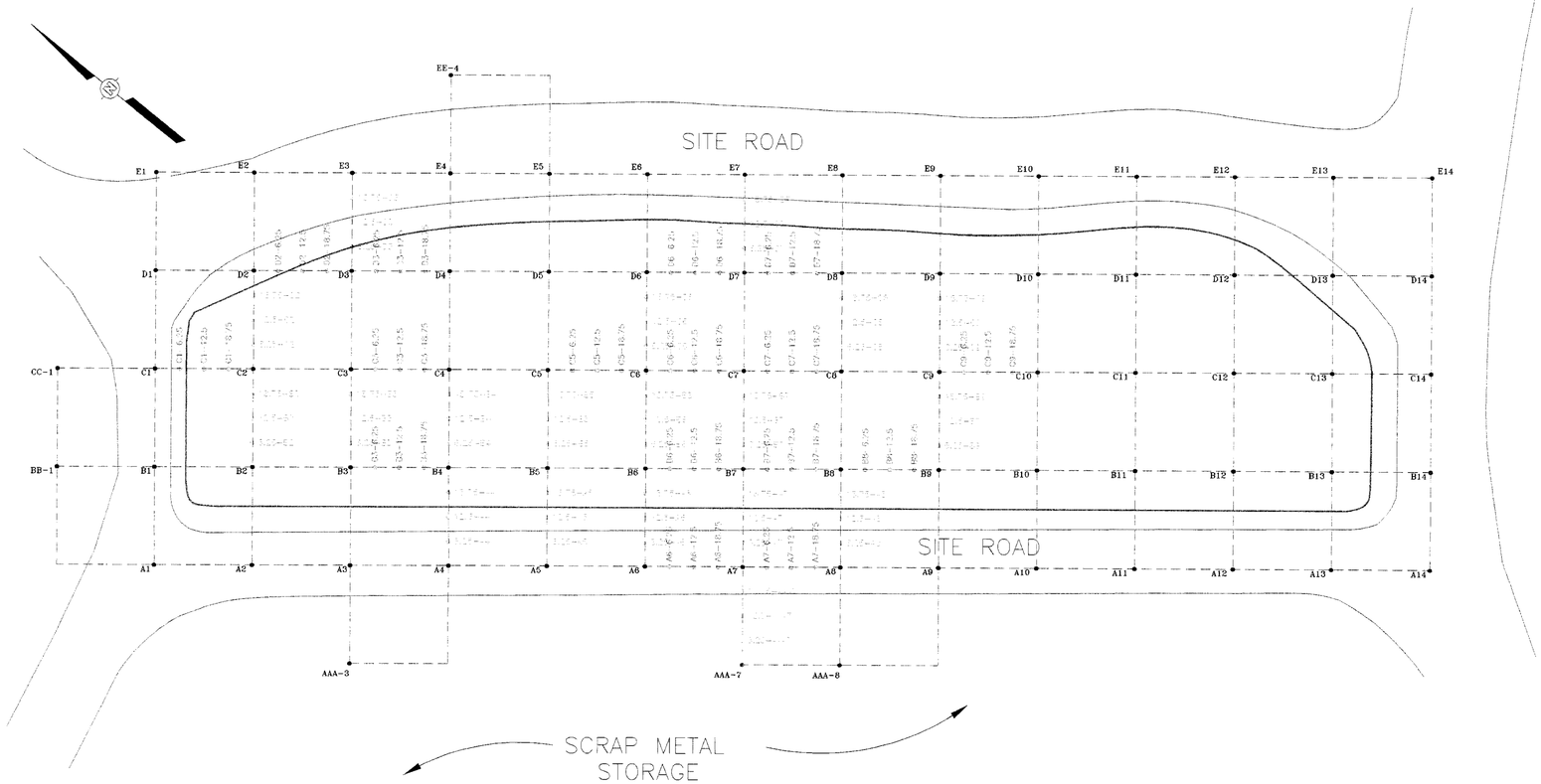

LEGEND

A1 ●	SOIL BORING LOCATION
- - - - - - - - - -	25 ft. GRID
———	APPROXIMATE FILL LOCATION
———	SITE ROADS
mg/Kg	MILLIGRAMS PER KILOGRAMS
ft. bgs	FEET BELOW GROUND SURFACE
PCB	POLYCHLORINATED BIPHENYLS

SCALE
0 20 40

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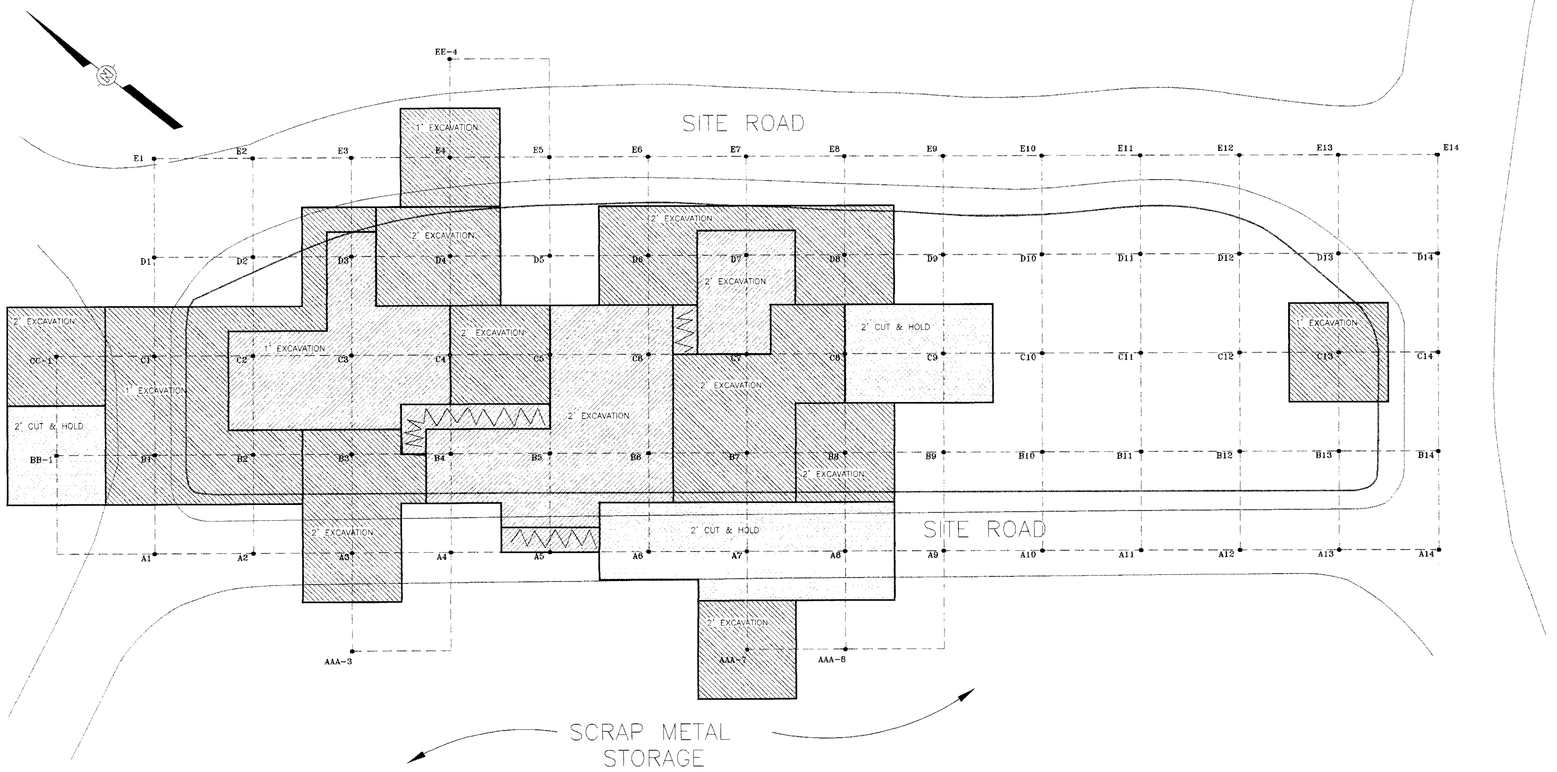
FIGURE 4
JUNE 2001 SAMPLING LOCATION
SITE ASSESSMENT
AKT GRAVEL PIT
TOTAL PCB CONCENTRATIONS

DRAWING NUMBER	APPROVED BY	CHECKED BY	DRAWN BY
820327-FIGE			L. SHULMAN 7/16/01

OFFICE	X-REF	IMAGE
Alpharetta, GA	---	---

PLOT DATE: 4/8/01
FORMAT REVISION 3/25/99



	SUB-C	SUB-D	CUT & HOLD
FIGURE-B	380.50 CU YD	681.44 CU YD	244.57 CU YD
FIGURE-C	243.06 CU YD	434.04 CU YD	46.30 CU YD
FIGURE-D	92.59 CU YD	594.71 CU YD	0 CU YD
TOTALS	716.15 CU YD	1,710.19 CU YD	290.87 CU YD

REMOVED FOR OPERATIONAL NEEDS – NO DATA REQUIRED

SCALE
0 20 40

LEGEND

A1 •	SOIL BORING LOCATION
- - - - - - - -	25 ft. GRID
	APPROXIMATE FILL LOCATION
	SITE ROADS
mg/Kg	MILLIGRAMS PER KILOGRAMS
ft. bgs	FEET BELOW GROUND SURFACE
PCB	POLYCHLORINATED BIPHENYLS

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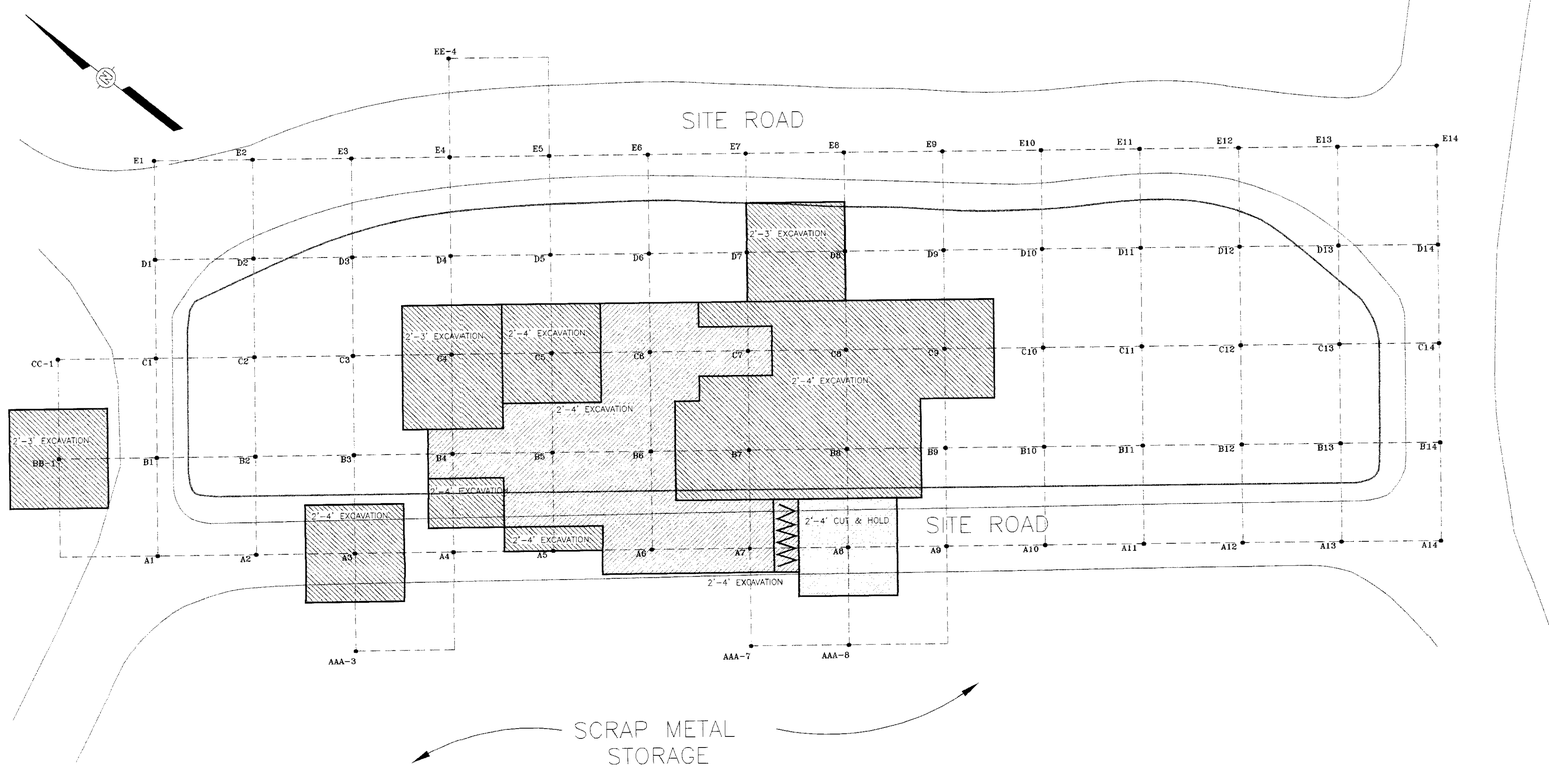
CRYSTAL SPRINGS, MISSISSIPPI

FIGURE 5
EXCAVATION 1 FT AND 2 FT
SITE ASSESSMENT
AKT GRAVEL PIT
TOTAL PCB CONCENTRATIONS

DRAWING NUMBER 820327-FIGB
APPROVED BY
CHECKED BY
DRAWN BY L. SHULMAN 7/16/01
OFFICE Alpharetta, GA
X-REF ---
IMAGE ---

PLOT DATE: 4/8/01
FORMAT REVISION 3/25/99



	SUB-C	SUB-D	CUT & HOLD
FIGURE-B	380.50 CU YD	681.44 CU YD	244.57 CU YD
FIGURE-C	243.06 CU YD	434.04 CU YD	46.30 CU YD
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TOTALS	716.15 CU YD	1,710.19 CU YD	290.87 CU YD

REMOVED FOR OPERATIONAL NEEDS - NO DATA REQUIRED

SCALE
0 20 40

LEGEND

A1 ●	SOIL BORING LOCATION
- - - - - - - -	25 ft. GRID
	APPROXIMATE FILL LOCATION
	SITE ROADS
mg/Kg	MILLIGRAMS PER KILOGRAMS
ft. bgs	FEET BELOW GROUND SURFACE
PCB	POLYCHLORINATED BIPHENYLS

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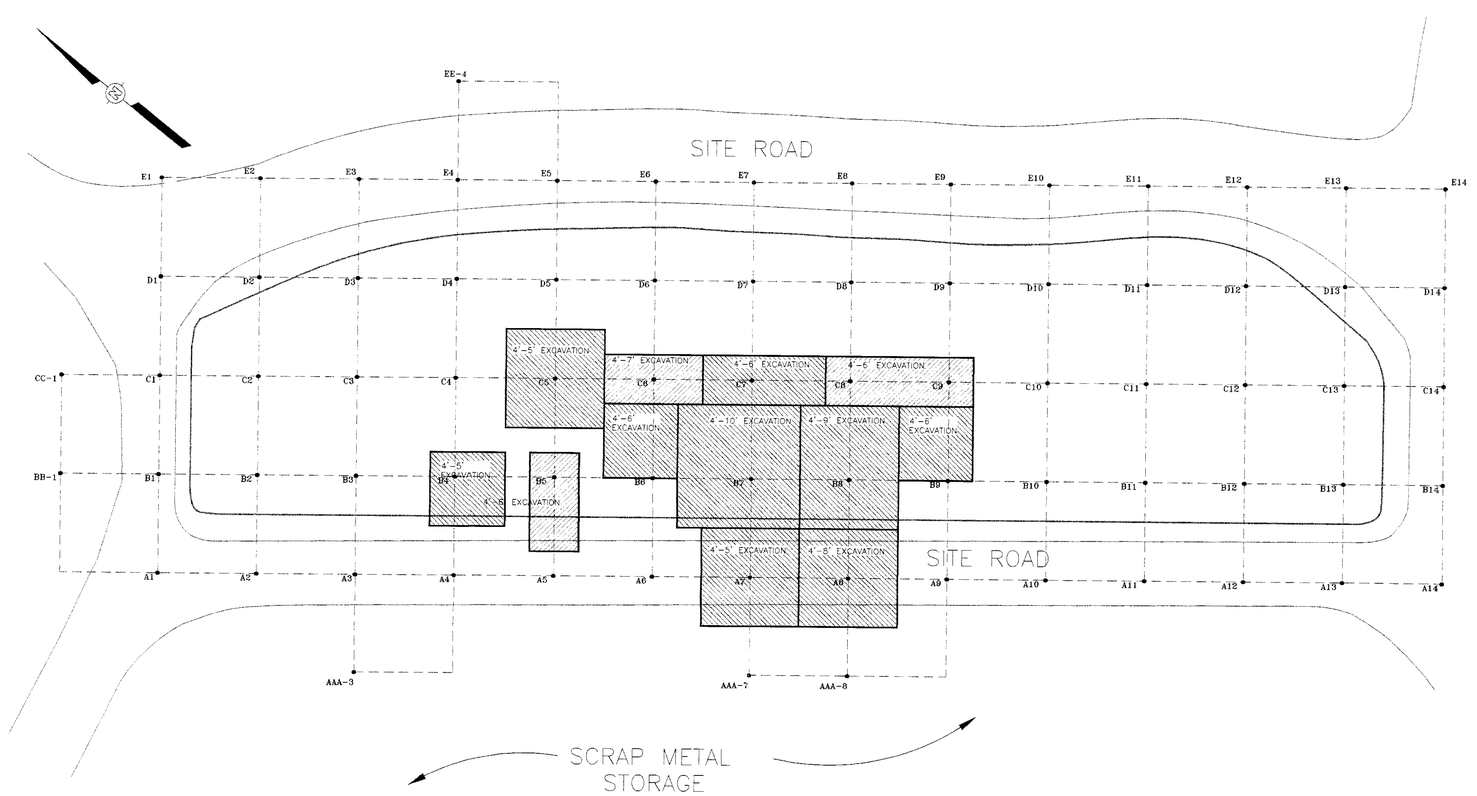
CRYSTAL SPRINGS, MISSISSIPPI

FIGURE 6
EXCAVATION >2 FT TO 4 FT
SITE ASSESSMENT
AKT GRAVEL PIT
TOTAL PCB CONCENTRATIONS

DRAWING NUMBER	820327-FIGC
APPROVED BY	
CHECKED BY	
DRAWN BY	L. SHULMAN 7/16/01
OFFICE	Alpharetta, GA
X-REF	---
IMAGE	---

PLOT DATE: 4/8/01
FORMAT REVISION 3/25/99



	SUB-C	SUB-D	CUT & HOLD
FIGURE-B	380.50 CU YD	681.44 CU YD	244.57 CU YD
FIGURE-C	243.06 CU YD	434.04 CU YD	46.30 CU YD
FIGURE-D	92.59 CU YD	594.71 CU YD	0 CU YD
TOTALS	716.15 CU YD	1,710.19 CU YD	290.87 CU YD

LEGEND

A1 •	SOIL BORING LOCATION
- - - - - - - - - -	25 ft. GRID
———	APPROXIMATE FILL LOCATION
———	SITE ROADS
mg/Kg	MILLIGRAMS PER KILOGRAMS
ft. bgs	FEET BELOW GROUND SURFACE
PCB	POLYCHLORINATED BIPHENYLS

SCALE
0 20 40

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FIGURE 7
EXCAVATION >4'-6' & GREATER
SITE ASSESSMENT
AKT GRAVEL PIT
TOTAL PCB CONCENTRATIONS

DRAWING NUMBER 820327-FIGD
APPROVED BY
CHECKED BY
DRAWN BY L. SHULMAN 7/16/01
OFFICE Alpharetta, GA
X-REF ---
IMAGE ---

PLOT DATE: 4/8/01
FORMAT REVISION 3/25/99

Table 1
Initial Areas of Excavation
AKT Gravel Pit

AOE Designation **Grid Numbers**	**Soil Removal** **Depth Range for TSCA Disposal**
AOE 1 C2, C3, and D3	0' to 1' 0" to 12"
AOE 2 B4, B5, and B6	0' to 5' 0" to 60"
AOE 3 C6	0' to 7' 0" to 84"
AOE 4 D7 and C7	0' to 3' 0" to 36"
AOE 5 B8, C8, and C9	4' to 6' 36" to 72"
AOE 6 A7	3' to 4' 24" to 48"

Table 2
June 2001 Sampling Locations
AKT Gravel Pit

AOE Designation Grid Numbers	Soil Removal Depth Range for TSCA Disposal	Number of Sampling Locations	Samples per Location/ Depth Range	Total Number Samples
AOE 1 C2, C3, and D3	0' to 1' 0" to 12"	24	1/ 0'-1'	24
AOE 2 B4, B5, and B6	0' to 5' 0" to 60"	21	3/ 0'-2', 2'-4',5 '	63
AOE 3 C6	0' to 7' 0" to 84"	12	4/ 0'-2', 2'-4', 4'-6', 7'	48
AOE 4 D7 and C7	0' to 3' 0" to 36"	15	2/ 0'-2', 3'	30
AOE 5 B8, C8, and C9	4' to 6' 36" to 72"	21	2/ 3'-5', 6'	42
AOE 6 A7	3' to 4' 24" to 48"	12	1/ 2'-4'	12
	TOTAL	105		219