



**CONESTOGA-ROVERS
& ASSOCIATES**

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

February 10, 2006

Reference No. 13151-10

Mr. Mazin Enwiya
United States Environmental Protection Agency
Region 5
77 West Jackson Boulevard (SR-6J)
Chicago, IL 60604-3507

Dear Mr. Enwiya:

Re: Monthly Progress Report No. 39
Remedial Design/Remedial Action UAO
Former Rockwell International Corporation Site
Allegan, Michigan

On behalf of ArvinMeritor, Inc. (ArvinMeritor), and in accordance with Section XI, Paragraph 67 of the Unilateral Administrative Order (UAO) for the Former Rockwell International Site (Site) effective October 30, 2002, Conestoga-Rovers & Associates (CRA) has prepared the following progress report for the period of January 1, 2006 through January 31, 2006. Pursuant to Section XI, Paragraph 67 of the Administrative Order, this report is due at the United States Environmental Protection Agency (U.S. EPA) on February 10, 2006.

1. Activities Taken to Comply with the Administrative Order

During this reporting period, the following activities were undertaken:

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

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

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

3. Actions Planned for the Next 90-Days

The following activities are anticipated for the next 90 days:

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



**CONESTOGA-ROVERS
& ASSOCIATES**

February 10, 2006

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4. Difficulties Encountered

Although access was granted by the City of Allegan to implement the RA, restrictive covenant agreements with the City continue to remain unresolved. Conference calls with counsel for the City of Allegan and U.S. EPA Assistant Regional Counsel, Kathleen Schnieders, resulted in the conclusion that the restrictive covenant requirement would be deferred at this time.

5. Actions Taken to Resolve Difficulties Encountered

No actions were taken during this reporting period.

We trust this progress report provides you with the information required to assess the status of this project. Should you have any questions on the above, please do not hesitate to contact us.

Yours truly,

CONESTOGA-ROVERS & ASSOCIATES

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

Gregory A. Carli, P. E.

JP/p/12

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



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March 10, 2006

Reference No. 13151-10

Mr. Mazin Enwiya
United States Environmental Protection Agency
Region 5
77 West Jackson Boulevard (SR-6J)
Chicago, IL 60604-3507

Dear Mr. Enwiya:

Re: Monthly Progress Report No. 40
Remedial Design/Remedial Action UAO
Former Rockwell International Corporation Site
Allegan, Michigan

On behalf of ArvinMeritor, Inc. (ArvinMeritor), and in accordance with Section XI, Paragraph 67 of the Unilateral Administrative Order (UAO) for the Former Rockwell International Site (Site) effective October 30, 2002, Conestoga-Rovers & Associates (CRA) has prepared the following progress report for the period of February 1, 2006 through February 28, 2006. Pursuant to Section XI, Paragraph 67 of the Administrative Order, this report is due at the United States Environmental Protection Agency (U.S. EPA) on March 10, 2006.

1. Activities Taken to Comply with the Administrative Order

During this reporting period, the following activities were undertaken:

- On February 10, 2006, Monthly Progress Report No. 39 was submitted to the U.S. EPA covering the period of January 1, through January 31, 2006;
- Ongoing discussions between CRA and Waste Management (WM) have occurred throughout the reporting period regarding the required approval for the disposal of soils to be generated from the remaining excavation areas to be completed in 2006;
- Coordination of drilling subcontractor services to facilitate subsurface soil sample collection for waste characterization laboratory analyses as per the request of WM; and
- Weekly Site inspections were conducted on February 1, 9, 15, and 22, 2006.



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

Due to precipitation and snow melt, surface water has accumulated within the former Waste Water Treatment Plant (WWTP) pond area. In order to determine if the surface water is suitable for direct discharge to the City of Allegan sewer system or if the surface water requires treatment through the on-Site treatment system, the following sample was collected by CRA on March 1, 2006 as part of the RA:

<i>Sample ID</i>	<i>Sample Location</i>	<i>Laboratory Analysis</i>
W-37326-030106-NK-057	Former WWTP Ponds	Discharge Parameters

The sample was submitted under chain-of-custody protocol to KAR Laboratories for analyses as per the parameters listed in the City of Allegan Wastewater Discharge Permit. The results are pending and will be discussed in the progress report for the reporting period of March 1, 2006 through March 31, 2006.

3. Actions Planned for the Next 90-Days

The following activities are anticipated for the next 90 days:

- Collection and submittal of subsurface soil samples for waste characterization laboratory analyses;
- Continued discussion with WM regarding approval for disposal of soils generated from the remaining excavation areas to be completed in 2006;
- Weekly Site inspections; and
- Mobilization of heavy equipment to the Site in preparation for spring excavation activities.

4. Difficulties Encountered

Although access was granted by the City of Allegan to implement the RA, restrictive covenant agreements with the City continue to remain unresolved. Conference calls with counsel for the City of Allegan and U.S. EPA Assistant Regional Counsel, Kathleen Schnieders, resulted in the conclusion that the restrictive covenant requirement would be deferred at this time.



**CONESTOGA-ROVERS
& ASSOCIATES**

March 10, 2006

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Reference No. 13151-10

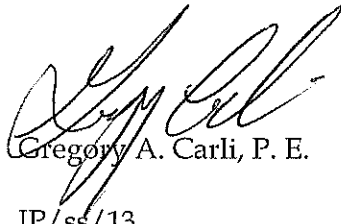
5. Actions Taken to Resolve Difficulties Encountered

No actions were taken during this reporting period.

We trust this progress report provides you with the information required to assess the status of this project. Should you have any questions on the above, please do not hesitate to contact us.

Yours truly,

CONESTOGA-ROVERS & ASSOCIATES



Gregory A. Carli, P. E.

JP/ss/13

c.c.: Kathleen Schnieders (U.S. EPA)
Matt Williams (MDEQ)
Omprakash Patel (Weston)
James Enright (Law Weathers & Richardson)
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April 10, 2006

Reference No. 13151-10

Mr. Mazin Enwiya
United States Environmental Protection Agency
Region 5
77 West Jackson Boulevard (SR-6J)
Chicago, IL 60604-3507

Dear Mr. Enwiya:

Re: Monthly Progress Report No. 41
Remedial Design/Remedial Action UAO
Former Rockwell International Corporation Site
Allegan, Michigan

On behalf of ArvinMeritor, Inc. (ArvinMeritor), and in accordance with Section XI, Paragraph 67 of the Unilateral Administrative Order (UAO) for the Former Rockwell International Site (Site) effective October 30, 2002, Conestoga-Rovers & Associates (CRA) has prepared the following progress report for the period of March 1, 2006 through March 31, 2006. Pursuant to Section XI, Paragraph 67 of the Administrative Order, this report is due at the United States Environmental Protection Agency (U.S. EPA) on April 10, 2006.

1. Activities Taken to Comply with the Administrative Order

During this reporting period, the following activities were undertaken:

- Discussions between CRA and Waste Management (WM) have occurred throughout the reporting period regarding the required approval for the disposal of soils from the remaining excavation areas to be completed in 2006;
- On March 2, 2006, CRA collected 17 subsurface samples for waste characterization laboratory analyses as per the request of WM;
- On March 10, 2006, Monthly Progress Report No. 40 was submitted to the U.S. EPA covering the period of February 1, through February 28, 2006;
- Discussions between CRA and Remedial Action (RA) contractor have occurred throughout the reporting period to determine the schedule of 2006 RA activities and the anticipated start date;
- Weekly Site inspections were conducted on March 1, 8, 15, 23, and 28, 2006;
- On March 15, 2006 during the weekly Site inspection it was noted that the EPA Site trailer was tipped on one end. The trailer was reset that day. No damage to the trailer was noted. The trailer being tipped was due to high winds and not due to a breach in Site security;



- Mobilization of equipment and Site preparation activities (i.e., Site survey and installation of turbidity curtain in Kalamazoo River) in anticipation of April 3, 2006 start date; and
- Dewatering of accumulated snow melt/rainwater from the former wastewater treatment pond area.

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

Due to precipitation and snow melt, water has accumulated within the former Waste Water Treatment Plant (WWTP) pond area. Similarly, accumulated water was noted in the underground vaults associated with the former WWTP. In order to determine if the water is suitable for direct discharge to the City of Allegan sewer system or if the water requires treatment through the on-Site treatment system, the following samples were collected by CRA as part of the RA:

<i>Sample ID</i>	<i>Sample Location</i>	<i>Laboratory Analysis</i>
W-37326-030106-NK-057	Former WWTP Ponds	Discharge Parameters
W-37326-032906-KK-038	Former WWTP Vault	Discharge Parameters

The analytical results generated for sample NK-057 were in compliance with the City of Allegan wastewater discharge permit requirements. Upon inspection of the on-Site waste water treatment system and discussion with a representative from the City of Allegan Publicly Owned Treatment Works (POTW) the accumulated water was discharged to the sanitary sewer after treatment through only the bag filter portion of the on-Site wastewater treatment system.

At the time of this report, the analytical results for sample KK-038 had not been received.

In preparation of excavation activities to be conducted as part of the RA, CRA had been requested by WM to submit additional waste characterization samples of soil representative of Excavation Area Nos. 5, 7, 8, 10, 12 and 13 (see Figure 1) to supplement the analytical data previously provided to WM. As requested, on March 2, 2006, 17 waste characterization samples (KK-136 to KK-152) were collected and submitted for selected Toxicity Characteristic Leaching Procedure (TCLP) metal analyses. The laboratory analytical results generated are summarized in Table 1. The waste characterization analytical results indicated that no analyzed parameter was detected at



a concentration above the respective laboratory reporting limit thereby confirming that the soils from these areas are non-hazardous.

3. Actions Planned for the Next 90-Days

The following activities are anticipated for the next 90 days:

- Continued discussion with WM regarding approval for disposal of soils from the remaining excavation areas to be completed in 2006;
- Completion of Site preparation activities;
- Initiate Site security for continued 2006 RA activities;
- Resume bi-weekly conference calls beginning April 5, 2006; and
- Excavation of contaminated soil and LNAPL impacted areas.

4. Difficulties Encountered

No difficulties were encountered during the reporting period.

5. Actions Taken to Resolve Difficulties Encountered

No actions were necessary during this reporting period.

6. On-Going Considerations Related to the Administrative Order

Although access was granted by the City of Allegan to implement the RA, restrictive covenant agreements with the City continue to remain unresolved. Conference calls with counsel for the City of Allegan and U.S. EPA Assistant Regional Counsel, Kathleen Schnieders, resulted in the conclusion that the restrictive covenant requirement would be deferred at this time.



**CONESTOGA-ROVERS
& ASSOCIATES**

April 10, 2006

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Reference No. 13151-10

We trust this progress report provides you with the information required to assess the status of this project. Should you have any questions on the above, please do not hesitate to contact us.

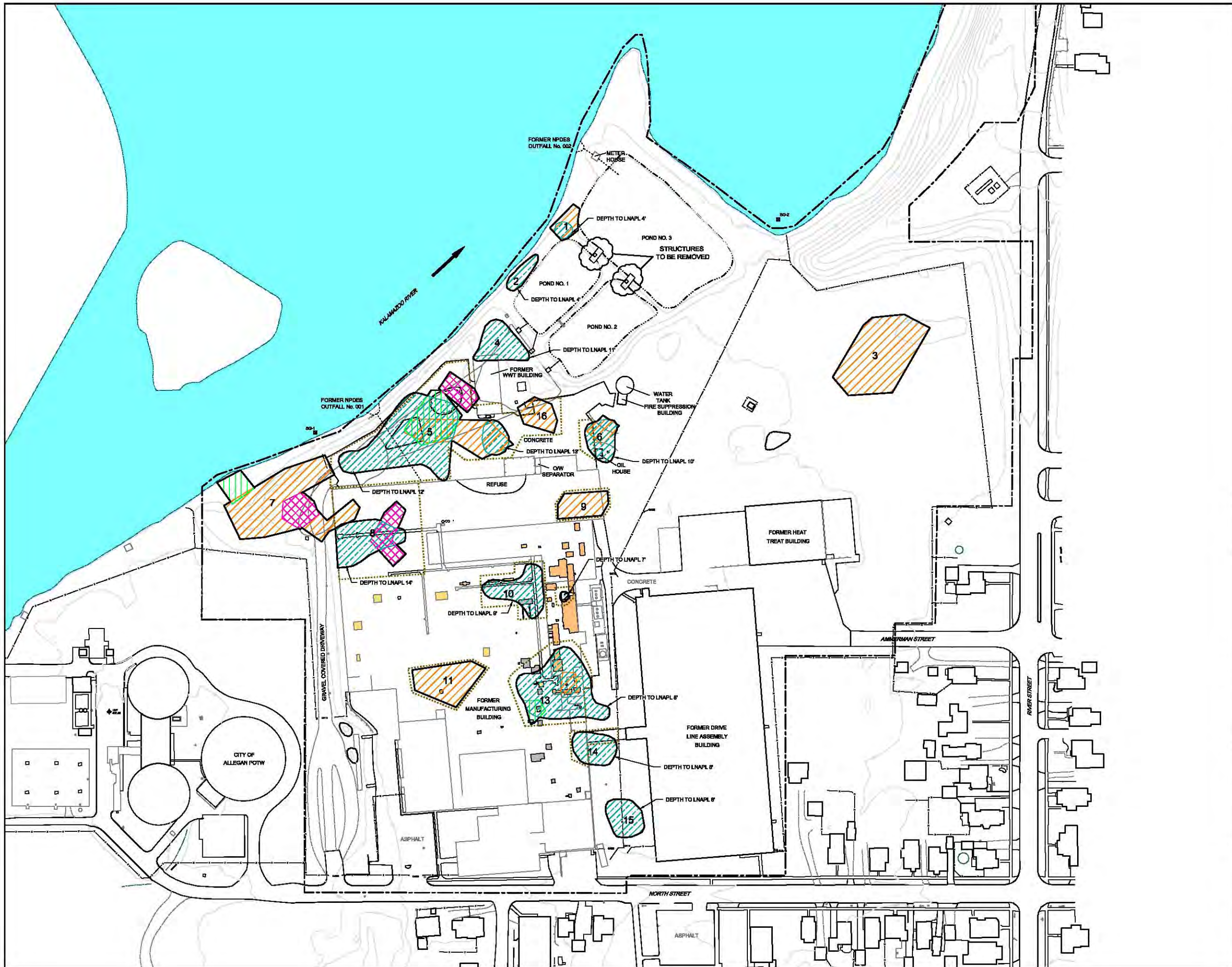
Yours truly,

CONESTOGA-ROVERS & ASSOCIATES

Gregory A. Carli, P. E.

JP/jp/15

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



NO.	Revision	Date	Initial

N

0 40 80ft

LEGEND

- TRANSFORMER
- FENCE
- SHORE LINE
- SITE BOUNDARY
- CONTOUR
- APPROXIMATE LIMIT OF POND
- CONCRETE FILLED PIT
- SAND FILLED PIT
- OPEN PIT
- CONCRETE TO BE REMOVED
- APPROXIMATE EXTENT OF SOIL EXCAVATION (0-2 ft BGS)
- APPROXIMATE EXTENT OF SOIL EXCAVATION (>10 ft BGS)
- APPROXIMATE EXTENT OF SOIL EXCAVATION (>10 ft BGS TO WATER TABLE)
- APPROXIMATE EXTENT OF EXCAVATION (TO REMOVE LNAPL)
- EXCAVATION AREAS

SCALE VERIFICATION
THIS BAR MEASURES 1" ON ORIGINAL. ADJUST SCALE ACCORDINGLY.

Approved _____

DRAWING STATUS

Status	Date	Initial

**FORMER ROCKWELL INTERNATIONAL CORP. SITE
ALLEGAN, MICHIGAN**

AREAS REQUIRING EXCAVATION

CONESTOGA-ROVERS & ASSOCIATES

Source Reference:

Project Manager: G.A.C.	Reviewed By: G.C.	Date: OCTOBER 2005
Scale: AS SHOWN	Project No.: 13151-10	Report No.: ENW1008 Drawing No.: figure 1

TABLE 1

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

Sample ID:	S-13151-030206-KK-136	S-13151-030206-KK-137	S-13151-030206-KK-138	S-13151-030206-KK-139	S-13151-030206-KK-140
Date Sampled:	3/2/2006	3/2/2006	3/2/2006	3/2/2006	3/2/2006
Sample Location:	Area No.7	Area No.7	Area No.7	Area No.7	Area No. 8

Parameter	Units	TCLP Criteria					
TCLP Metals							
Lead	mg/L	5.0	ND(0.5)	-	ND(0.5)	ND(0.5)	-
Barium	mg/L	100.0	-	-	-	-	-
Chromium	mg/L	5.0	-	ND(0.5)	ND(0.5)	-	ND(0.5)
			S-13151-030206-KK-145	S-13151-030206-KK-146	S-13151-030206-KK-147	S-13151-030206-KK-148	S-13151-030206-KK-149
			3/2/2006	3/2/2006	3/2/2006	3/2/2006	3/2/2006
			Area No. 5	Area No. 5	Area No. 5	Area No. 5	Area No. 13

Parameter	Units	TCLP Criteria					
TCLP Metals							
Lead	mg/L	5.0	-	-	-	-	ND(0.5)
Barium	mg/L	100.0	-	-	-	-	-
Chromium	mg/L	5.0	ND(0.5)	ND(0.5)	ND(0.5)	ND(0.5)	-

Notes:
 ND() - Parameter non-detect at reporting limit within parenthesis
 TCLP - Maximum concentration of contaminants for the toxicity characteristic as defined in the U.S. EPA's Title 40, Part 261 Regulation (using the Toxicity Characteristic Leaching Procedure)
 -- Parameter not analyzed
 NC - no criteria

TABLE 1

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

Sample ID:	S-13151-030206-KK-141	S-13151-030206-KK-142	S-13151-030206-KK-143	S-13151-030206-KK-144
Date Sampled:	3/2/2006	3/2/2006	3/2/2006	3/2/2006
Sample Location:	Area No. 5	Area No. 5	Area No. 5	Area No. 5

Parameter	Units	TCLP Criteria				
TCLP Metals						
Lead	mg/L	5.0	-	ND(0.5)	ND(0.5)	-
Barium	mg/L	100.0	-	-	-	-
Chromium	mg/L	5.0	ND(0.5)	ND(0.5)	ND(0.5)	ND(0.5)

	S-13151-030206-KK-150	S-13151-030206-KK-151	S-13151-030206-KK-152
	3/2/2006	3/2/2006	3/2/2006
	Area No. 13	Area No. 7	Area No. 5

Parameter	Units	TCLP Criteria			
TCLP Metals					
Lead	mg/L	5.0	ND(0.5)	ND(0.5)	-
Barium	mg/L	100.0	ND(0.5)	-	-
Chromium	mg/L	5.0	-	ND(0.5)	ND(0.5)

Notes:

ND() - Parameter non-detect at reporting limit within parenthesis
 TCLP - Maximum concentration of contaminants for the toxicity characteristic as defined in the U.S. EPA's Title 40, Part 261 Regulation (using the Toxicity Characteristic Leaching Procedure)
 -- Parameter not analyzed
 NC - no criteria



**CONESTOGA-ROVERS
& ASSOCIATES**

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May 10, 2006

Reference No. 13151-10

Mr. Mazin Enwiya
United States Environmental Protection Agency
Region 5
77 West Jackson Boulevard (SR-6J)
Chicago, IL 60604-3507

Dear Mr. Enwiya:

Re: Monthly Progress Report No. 42
Remedial Design/Remedial Action UAO
Former Rockwell International Corporation Site
Allegan, Michigan

On behalf of ArvinMeritor, Inc. (ArvinMeritor), and in accordance with Section XI, Paragraph 67 of the Unilateral Administrative Order (UAO) for the Former Rockwell International Site (Site) effective October 30, 2002, Conestoga-Rovers & Associates (CRA) has prepared the following progress report for the period of April 1, 2006 through April 30, 2006. Pursuant to Section XI, Paragraph 67 of the Administrative Order, this report is due at the United States Environmental Protection Agency (U.S. EPA) on May 10, 2006.

1. Activities Taken to Comply with the Administrative Order

During this reporting period, the following activities were undertaken:

- On April 4, 2006 in order to delineate the Toxic Substances Control Act (TSCA) LNAPL impacted portion of Excavation Area No. 5, eight temporary monitoring wells were installed;
- On April 10, 2006, Monthly Progress Report No. 41 was submitted to the U.S. EPA covering the period of March 1, through March 30, 2006;
- On April 11, 2006, one LNAPL sample was collected from one of the eight temporary wells (TW-6) installed within Excavation Area No. 5;
- On April 11, 2006, following removal of Michigan Frost Law weight restrictions, excavation activities commenced and continued throughout the reporting period;
- Soil chemical and LNAPL verification samples were collected from completed excavation areas throughout the reporting period; and
- Treatment of wastewater through the on-Site wastewater treatment system continued throughout the reporting period.



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

In April 2006, the following samples were collected as part of the RA by CRA:

<i>Sample ID</i>	<i>Sample Location</i>	<i>Laboratory Analysis</i>
O-13151-041106-KK-034	Excavation Area No.5 Temporary Well (TW-6)	PCBs
S-13151-041706-KK-168	Underneath sewer in Excavation Area No. 10	PCBs, TCLP SVOCs, TCLP VOCs, and TCLP Metals
S-13151-042406-KK-169	Soil from vicinity of Sump in Excavation No. 13	PCBs, TCLP SVOCs, TCLP VOCs, TCLP metals,

All samples were submitted under chain-of-custody protocol to Severn Trent Laboratories Inc. (STL) for laboratory analyses.

In preparation of excavation activities to be conducted within the LNAPL portion of Area No. 5, CRA installed eight temporary monitoring wells (TW-1 to TW-8) within the vicinity of the former well location MW4A in order to delineate the extent of LNAPL at concentrations greater than 50,000 µg/kg. In accordance with the Remedial Design Work Plan, the wells were allowed to stabilize for a minimum of seven days to confirm the presence or absence of LNAPL at each location. LNAPL was encountered in five of the eight monitoring wells (TW-2 to TW-4, TW-6, and TW-7) however, there was sufficient LNAPL within only one temporary well location (TW-6) to collect a sample. Therefore, an LNAPL sample (KK-034) was collected and submitted for PCB analysis from TW-6. The laboratory results generated are summarized in Table 1. The LNAPL sample indicated that Aroclor 1254 was detected with a concentration of 96,000 µg/kg. The PCB concentration is above the criteria for disposal at a TSCA regulated facility of 50,000 µg/kg. The soil impacted by the LNAPL at concentrations great than 50,000 µg/kg will be sent for disposal to a TSCA regulated facility. Following excavation, a 10-foot buffer zone around the TSCA LNAPL will be excavated, stockpiled, and sampled for PCBs to ensure that the remaining LNAPL portion of Area No. 5 to be excavated is suitable for off-Site disposal as non-TSCA material.

On April 17, 2006, while excavating within Area No. 10, stained soil underneath the sewer line within the excavation was noted. Following removal of the sewer line, the stained soil was excavated and stockpiled. One composite soil sample (KK-168) of the stained soil was collected and submitted for total polychlorinated biphenyl (PCB), Toxicity Characteristic Leaching Procedure (TCLP) semi-volatile organic compounds (SVOC), TCLP volatile organic compounds (VOC), and TCLP metals analyses. The laboratory results generated are summarized in Table 1. The soil sample indicated that



the analyzed parameters were either not detected above the laboratory detection limit or below the appropriate criteria thereby confirming that the soils are non-hazardous.

On April 24, 2006, while excavating within Area No. 13, an oil/water separator was encountered. The separator and the soil within the vicinity of the separator was removed. One composite sample (KK-169) of the soil and sludge with the separator was sampled and submitted for PCBs, TCLP SVOCs, TCLP VOCs, and TCLP metals. The laboratory results generated are summarized in Table 1. The LNAPL sample indicated that Aroclor 1254 was detected with a concentration of 820 µg/kg. The PCB concentration is below the criteria for disposal at a TSCA regulated facility of 50,000 µg/kg.

During April 2006, 91 soil chemical verification samples were collected from Excavation Areas Nos. 5, 7, 11, and 13. All samples were submitted under chain-of-custody protocol to STL for laboratory analyses. A summary of the preliminary unvalidated soil chemical verification sample analytical results is provided in Table 2. All soil chemical verification samples collected from Area Nos. 5, 7, and 11 were analyzed for metals. Soil chemical verification samples collected from Area No. 8 were submitted for polychlorinated dibenzo-p-dioxins and polychlorinated dibenzofurans (PCDD/PCDF). The following is a summary of the analytical results generated for each area.

Excavation Area No. 5

On April 26, 2006, 13 soil chemical verification samples (KK-170 to KK-182) were collected and submitted for metals analyses. Exceedances of the applicable Soil Cleanup Criteria for 0-2 feet below ground surface (bgs) for either arsenic or iron were noted in the following samples, KK-170, KK-171, KK-177, KK-178, KK-179, KK-180, and KK-181. Further excavation and verification sampling was in progress at the time of this report.

Excavation Area No. 7

On April 27, 2005, 63 soil chemical verification samples (KK-183 to KK-245) were collected and submitted for metals analyses. Exceedances of the applicable Soil Cleanup Criteria for 0-2 feet bgs for either arsenic or iron were noted in the following samples, KK-183, KK-187, KK-198 to KK-208, KK-212 to KK-221, KK-228, and KK-231. Further excavation and verification sampling was in progress at the time of this report.

Excavation Area No. 11

On April 11, 2006, further excavation in the vicinity of soil sample KK-085 collected on November 11, 2005 was completed. Seven soil chemical verification samples (KK-153 to KK-159) were collected and submitted for metals analyses. No exceedances of the



applicable Soil Cleanup Criteria for >2 feet bgs were noted therefore Area No. 11 was deemed complete.

Excavation Area No. 13

On April 11, 2006, eight soil chemical verification samples (KK-160 to KK-167) were collected and submitted for dioxin analyses from the 2-10 ft bgs portion of Area No. 13. No exceedances of the applicable Soil Cleanup Criteria for >2 feet bgs were noted, therefore, the 2-10 ft bgs portion of Area No. 13 was deemed complete.

In addition to the soil chemical verification samples collected, 68 LNAPL soil verification samples were collected from Excavation Area Nos. 10, 12, and 13. A summary of LNAPL soil verification samples is provided in Table 3 along with an indication of whether or not the sample passed or failed the LNAPL soil test. As shown in Table 3, no samples failed to meet the LNAPL soil test requirements.

3. Actions Planned for the Next 90-Days

The following activities are anticipated for the next 90 days:

- Continued discussion with WM regarding approval for disposal of soils from the remaining excavation areas to be completed in 2006;
- Conduct sewer cleaning and subsequent video inspection;
- Excavation of contaminated soil and LNAPL impacted areas; and
- Begin Site balancing and final grading activities.

4. Difficulties Encountered

During April, CRA received two calls from Dave Sperry, Assistant City Manager for the City of Allegan. On the first occasion, Mr. Sperry informed CRA about complaints from local residents regarding the speed of the trucks servicing the Site. Residents had complained that the speed of trucks was causing the houses along North Street, specifically between River and Main Streets to shake. On the second occasion, Mr. Sperry informed CRA about odor complaints from local residents. Mr. Sperry was not sure of the source of the odors and was looking into whether or not the odors were from the City of Allegan Publicly Owned Treatment Works.



**CONESTOGA-ROVERS
& ASSOCIATES**

May 10, 2006

5

Reference No. 13151-10

5. Actions Taken to Resolve Difficulties Encountered

Regarding the first issue, CRA and CRA Services informed the trucking company (Cordes) of the complaint and to remind drivers of the speed limits on North Street and to use caution especially in residential areas around the Site. In addition, Site security reminds drivers prior to leaving the Site to be mindful of speed limits.

Regarding the second issue, CRA investigated to determine the odors were from the Site, however it is believed the City of Allegan Publicly Owned Treatment Works located east of the Site was the source of the odors. No odor issues have been noted on-Site.

6. On-Going Considerations Related to the Administrative Order

Although access was granted by the City of Allegan to implement the RA, restrictive covenant agreements with the City continue to remain unresolved. Conference calls with counsel for the City of Allegan and U.S. EPA Assistant Regional Counsel, Kathleen Schnieders, resulted in the conclusion that the restrictive covenant requirement would be deferred at this time.

We trust this progress report provides you with the information required to assess the status of this project. Should you have any questions on the above, please do not hesitate to contact us.

Yours truly,

CONESTOGA-ROVERS & ASSOCIATES

Gregory A. Carli, P. E.

JP/jp/17

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

TABLE 1

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

Sample ID:	O-13151-041106-KK-034	S-13151-041706-KK-168	S-13151-042406-KK-169
Date Sampled:	4/11/2006	4/17/2006	4/24/2006
Sample Location:	Temporary Well (TW-6) LNAPL	Underneath Sewer Ex.Area10	Oil/Water Separator Soil/Sludge

Parameter	Units	TSCA Criteria	TCLP Criteria			
PCBs						
PCBs (total)	ug/kg	50000	NC	ND(10000)	ND(3300)	ND(750)
Aroclor 1016	ug/kg	50000	NC	ND(10000)	ND(3300)	ND(750)
Aroclor 1221	ug/kg	50000	NC	ND(10000)	ND(3300)	ND(750)
Aroclor 1232	ug/kg	50000	NC	ND(10000)	ND(3300)	ND(750)
Aroclor 1242	ug/kg	50000	NC	ND(10000)	ND(3300)	ND(750)
Aroclor 1248	ug/kg	50000	NC	ND(10000)	ND(3300)	ND(750)
Aroclor 1254	ug/kg	50000	NC	96000	ND(3300)	820
Aroclor 1260	ug/kg	50000	NC	ND(10000)	ND(3300)	ND(750)
TCLP VOCs						
Benzene	mg/L	NC	0.5	-	ND(0.025)	ND(0.025)
Carbon Tetrachloride	mg/L	NC	0.5	-	ND(0.025)	ND(0.025)
Chlorobenzene	mg/L	NC	100.0	-	ND(0.025)	ND(0.025)
Chloroform	mg/L	NC	6.0	-	ND(0.025)	ND(0.025)
1,2-Dichloroethane	mg/L	NC	0.5	-	ND(0.025)	ND(0.025)
1,1-Dichloroethylene	mg/L	NC	0.7	-	ND(0.025)	ND(0.025)
Methyl ethyl ketone	mg/L	NC	200.0	-	ND(0.025)	ND(0.025)
Tetrachloroethylene	mg/L	NC	0.7	-	ND(0.025)	ND(0.025)
Trichlorethylene	mg/L	NC	0.5	-	ND(0.025)	ND(0.025)
Vinyl Chloride	mg/L	NC	0.2	-	ND(0.025)	ND(0.025)

Notes:

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

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

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

PCBs - Polychlorinated Biphenyls

SVOCs - Semivolatile Organic Compounds

VOCs - Volatile Organic Compounds

-- Parameter not analyzed

NC - no criteria

1.00 - Parameter exceeds applicable TSCA criteria.

TABLE 1

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

Sample ID:	O-13151-041106-KK-034	S-13151-041706-KK-168	S-13151-042406-KK-169
Date Sampled:	4/11/2006	4/17/2006	4/24/2006
Sample Location:	Temporary Well (TW-6) LNAPL	Underneath Sewer Ex.Area10	Oil/Water Separator Soil/Sludge

Parameter	Units	TSCA Criteria	TCLP Criteria			
TCLP SVOCs						
o-Cresol	mg/L	NC	200.0	-	ND(0.004)	ND(0.004)
m-Cresol & p-Cresol	mg/L	NC	200.0	-	ND(0.04)	ND(0.04)
1,4-Dichlorobenzene	mg/L	NC	7.5	-	ND(0.004)	ND(0.004)
2,4-Dinitrotoluene	mg/L	NC	0.13	-	ND(0.02)	ND(0.02)
Hexachlorobenzene	mg/L	NC	0.13	-	ND(0.02)	ND(0.02)
Hexachlorobutadiene	mg/L	NC	0.5	-	ND(0.02)	ND(0.02)
Hexachloroethane	mg/L	NC	3.0	-	ND(0.02)	ND(0.02)
Nitrobenzene	mg/L	NC	2.0	-	ND(0.004)	ND(0.004)
Pentachlorophenol	mg/L	NC	100.0	-	ND(0.04)	ND(0.04)
Pyridine	mg/L	NC	5.0	-	ND(0.02)	ND(0.02)
2,4,5-Trichlorophenol	mg/L	NC	400.0	-	ND(0.02)	ND(0.02)
2,4,6-Trichlorophenol	mg/L	NC	2.0	-	ND(0.02)	ND(0.02)
TCLP Metals						
Arsenic	mg/L	NC	5.0	-	ND(0.5)	ND(0.5)
Barium	mg/L	NC	100.0	-	15.1	ND(10)
Cadmium	mg/L	NC	1.0	-	ND(0.1)	ND(0.1)
Chromium	mg/L	NC	5.0	-	ND(0.5)	ND(0.05)
Lead	mg/L	NC	5.0	-	ND(0.5)	ND(0.5)
Selenium	mg/L	NC	1.0	-	ND(0.25)	ND(0.25)
Silver	mg/L	NC	5.0	-	ND(0.5)	ND(0.5)
Mercury	mg/L	NC	0.2	-	ND(0.002)	ND(0.002)

Notes:

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

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

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

Part 261 Regulation (using the Toxicity Characteristic Leaching Procedure)

PCBs - Polychlorinated Biphenyls

SVOCs - Semivolatile Organic Compounds

VOCs - Volatile Organic Compounds

-- Parameter not analyzed

NC - no criteria

J - Estimated result. Result is less than RL.

1.00	- Parameter exceeds applicable TSCA criteria.
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TABLE 2

**SUMMARY OF PRELIMINARY SOIL CLEANUP VERIFICATION SAMPLING ANALYTICAL RESULTS
FORMER ROCKWELL INTERNATIONAL CORPORATION
ALLEGAN, MICHIGAN**

Selected Parameters		Soil Cleanup Criteria					
		0 - 2 feet bgs ⁽¹⁾		> 2 feet bgs ⁽²⁾			
		Sample ID:	Date Sampled:	Sample Location:	Sample Depth (feet bgs)		
		S-13151-041106-KK-153	S-13151-041106-KK-154	S-13151-041106-KK-155	S-13151-041106-KK-156		
		4/11/2006	4/11/2006	4/11/2006	4/11/2006		
		Excavation 11 - Wall 1	Excavation 11 - Wall 2	Excavation 11 - Wall 3	Excavation 11 - Floor 1		
		3	3	3	4		
Metals							
Aluminum	mg/kg	50,000	660,000	2,540	1,010	519	8,260
Antimony	mg/kg	180	670	0.035 B	ND (0.17)	ND (0.17)	ND (0.20)
Arsenic	mg/kg	9.4	61	6.9	0.53	0.60	2.9
Barium	mg/kg	37,000	250,000	21	5.7	2.5	49.7
Beryllium	mg/kg	410	3,100	0.13 B	0.037 B	ND (0.17)	0.42
Cadmium	mg/kg	550	4,100	0.073	0.012 B	0.012 B	0.086
Chromium Total	mg/kg	--	--	6.0	2.6	1.7	13.2
Cobalt	mg/kg	2,600	18,000	3.4	1.2	0.72	6.3
Copper	mg/kg	20,000	140,000	10.8	2.4	1.9	13.5
Iron	mg/kg	160,000	1,000,000	9,450 J	2,340 J	1,600 J	13,400 J
Lead	mg/kg	400	900	11.8	1.2	1.1	6.6
Manganese	mg/kg	25,000	170,000	259 J	58.7 J	48.2 J	380 J
Mercury	mg/kg	160	1,100	0.039 B	ND (0.042)	0.017 B	0.023 B
Nickel	mg/kg	40,000	270,000	7.4	2.5	1.7	14.8
Selenium	mg/kg	2,600	18,000	ND (0.18)	ND (0.17)	ND (0.17)	ND (0.20)
Silver	mg/kg	2,500	17,000	0.039 B	ND (0.084)	ND (0.083)	0.065 B
Thallium	mg/kg	35	240	0.055 B, J	0.014 B, J	0.013 B, J	0.085 B, J
Vanadium	mg/kg	750	10,000	8.0	3.3	2.4	19.0
Zinc	mg/kg	170,000	1,000,000	37.9 J	6.1 J	12.6 J	29.1 J

TABLE 2

**SUMMARY OF PRELIMINARY SOIL CLEANUP VERIFICATION SAMPLING ANALYTICAL RESULTS
FORMER ROCKWELL INTERNATIONAL CORPORATION
ALLEGAN, MICHIGAN**

Selected Parameters		Soil Cleanup Criteria					
		0 - 2 feet bgs ⁽¹⁾		> 2 feet bgs ⁽²⁾			
		Sample ID:	Date Sampled:	Sample Location:	Sample Depth (feet bgs)		
		S-13151-041106-KK-157	S-13151-041106-KK-158	S-13151-041106-KK-159	S-13151-041106-KK-153		
		4/11/2006	4/11/2006	4/11/2006	4/11/2006		
		Excavation 11 - Floor 2	Excavation 11 - Floor 3	Excavation 11 - Floor 3	Excavation 11 - Wall 1		
		4	4	4	3		
Metals							
Aluminum	mg/kg	50,000	660,000	7,410	5,940	4,580	2540
Antimony	mg/kg	180	670	ND (0.19)	ND (0.20)	ND (0.20)	0.035 B
Arsenic	mg/kg	9.4	61	2.9	2.2	2.0	6.9
Barium	mg/kg	37,000	250,000	42.0	37.1	29.4	21
Beryllium	mg/kg	410	3,100	0.38	0.32	0.24	0.13 B
Cadmium	mg/kg	550	4,100	0.10	0.077	0.071	0.073
Chromium Total	mg/kg	--	--	12.2	10.2	8.3	6
Cobalt	mg/kg	2,600	18,000	5.7	4.8	3.8	3.4
Copper	mg/kg	20,000	140,000	12.8	10.8	9.5	10.8
Iron	mg/kg	160,000	1,000,000	12,700 J	10,500 J	8,710 J	9450 J
Lead	mg/kg	400	900	5.6	4.7	4.0	11.8
Manganese	mg/kg	25,000	170,000	309 J	289 J	251 J	259 J
Mercury	mg/kg	160	1,100	0.020 B	0.032 B	ND (0.049)	0.039 B
Nickel	mg/kg	40,000	270,000	13.2	10.9	8.6	7.4
Selenium	mg/kg	2,600	18,000	ND (0.19)	ND (0.20)	ND (0.20)	ND (0.18)
Silver	mg/kg	2,500	17,000	0.078 B	0.075 B	0.072 B	0.039 B
Thallium	mg/kg	35	240	0.11 J	0.070 B, J	0.071 B, J	0.055 B, J
Vanadium	mg/kg	750	10,000	18.2	15.7	12.9	8
Zinc	mg/kg	170,000	1,000,000	29.3 J	22.1 J	21.2 J	37.9 J

TABLE 2

**SUMMARY OF PRELIMINARY SOIL CLEANUP VERIFICATION SAMPLING ANALYTICAL RESULTS
FORMER ROCKWELL INTERNATIONAL CORPORATION
ALLEGAN, MICHIGAN**

Selected Parameters		Soil Cleanup Criteria											
		0 - 2 feet bgs ⁽¹⁾		> 2 feet bgs ⁽²⁾									
		Sample ID:	Sample Location:	Sample Depth (feet bgs)	Sample ID:	Sample Location:	Sample Depth (feet bgs)						
		S-13151-041106-KK-154	Excavation 11 - Wall 2	3	S-13151-041106-KK-155	Excavation 11 - Wall 3	3	S-13151-041106-KK-156	Excavation 11 - Floor 1	4	S-13151-041106-KK-157	Excavation 11 - Floor 2	4
		Date Sampled:			Date Sampled:			Date Sampled:			Date Sampled:		
		4/11/2006			4/11/2006			4/11/2006			4/11/2006		
		1010	519	8260	7410								
Aluminum	mg/kg	50,000	660,000	1010	519	8260	7410						
Antimony	mg/kg	180	670	ND (0.17)	ND (0.17)	ND (0.20)	ND (0.19)						
Arsenic	mg/kg	9.4	61	0.53	0.6	2.9	2.9						
Barium	mg/kg	37,000	250,000	5.7	2.5	49.7	42						
Beryllium	mg/kg	410	3,100	0.037 B	ND (0.17)	0.42	0.38						
Cadmium	mg/kg	550	4,100	0.012 B	0.012 B	0.086	0.1						
Chromium Total	mg/kg	--	--	2.6	1.7	13.2	12.2						
Cobalt	mg/kg	2,600	18,000	1.2	0.72	6.3	5.7						
Copper	mg/kg	20,000	140,000	2.4	1.9	13.5	12.8						
Iron	mg/kg	160,000	1,000,000	2340 J	1600 J	13400 J	12700 J						
Lead	mg/kg	400	900	1.2	1.1	6.6	5.6						
Manganese	mg/kg	25,000	170,000	58.7 J	48.2 J	380 J	309 J						
Mercury	mg/kg	160	1,100	ND (0.042)	0.017 B	0.023 B	0.020 B						
Nickel	mg/kg	40,000	270,000	2.5	1.7	14.8	13.2						
Selenium	mg/kg	2,600	18,000	ND (0.17)	ND (0.17)	ND (0.20)	ND (0.19)						
Silver	mg/kg	2,500	17,000	ND (0.084)	ND (0.83)	0.065 B	0.078 B						
Thallium	mg/kg	35	240	0.014 B, J	0.013 B, J	0.085 B, J	0.11 J						
Vanadium	mg/kg	750	10,000	3.3	2.4	19	18.2						
Zinc	mg/kg	170,000	1,000,000	6.1 J	12.6 J	29.1 J	29.3 J						

TABLE 2

**SUMMARY OF PRELIMINARY SOIL CLEANUP VERIFICATION SAMPLING ANALYTICAL RESULTS
FORMER ROCKWELL INTERNATIONAL CORPORATION
ALLEGAN, MICHIGAN**

Selected Parameters		Soil Cleanup Criteria					
		0 - 2 feet bgs ⁽¹⁾		> 2 feet bgs ⁽²⁾			
		Sample ID:	Date Sampled:	Sample Location:	Sample Depth (feet bgs)		
		S-13151-041106-KK-158	S-13151-041106-KK-159	S-13151-042606-KK-170	S-13151-042606-KK-171		
		4/11/2006	4/11/2006	4/26/2006	4/26/2006		
		Excavation 11 - Floor 3	Excavation 11 - Floor 3	Excavation 5 - Floor 1	Excavation 5 - Floor 2		
		4	4	2	2		
Metals							
Aluminum	mg/kg	50,000	660,000	5940	4580	8140	5260
Antimony	mg/kg	180	670	ND (0.20)	ND (0.20)	0.87 J	4.2 J
Arsenic	mg/kg	9.4	61	2.2	2	12.9	17.8
Barium	mg/kg	37,000	250,000	37.1	29.4	536	1070
Beryllium	mg/kg	410	3,100	0.32	0.24	0.46	0.13 B
Cadmium	mg/kg	550	4,100	0.077	0.071	16	0.49
Chromium Total	mg/kg	--	--	10.2	8.3	186	103
Cobalt	mg/kg	2,600	18,000	4.8	3.8	17.8	11.4
Copper	mg/kg	20,000	140,000	10.8	9.5	343	297
Iron	mg/kg	160,000	1,000,000	10500 J	8710 J	139000 J	104000 J
Lead	mg/kg	400	900	4.7	4	167	61.6
Manganese	mg/kg	25,000	170,000	289 J	251 J	1910 J	14700 J
Mercury	mg/kg	160	1,100	0.032 B	ND (0.049)	0.25	0.036 B
Nickel	mg/kg	40,000	270,000	10.9	8.6	163	127
Selenium	mg/kg	2,600	18,000	ND (0.20)	ND (0.20)	ND (0.25)	ND (0.16)
Silver	mg/kg	2,500	17,000	0.075 B	0.072 B	22.6	0.26
Thallium	mg/kg	35	240	0.070 B, J	0.071 B, J	0.069 B	0.025 B
Vanadium	mg/kg	750	10,000	15.7	12.9	46.3	24
Zinc	mg/kg	170,000	1,000,000	22.1 J	21.2 J	170 J	30.2

TABLE 2

**SUMMARY OF PRELIMINARY SOIL CLEANUP VERIFICATION SAMPLING ANALYTICAL RESULTS
FORMER ROCKWELL INTERNATIONAL CORPORATION
ALLEGAN, MICHIGAN**

Selected Parameters		Soil Cleanup Criteria		Sample ID:	S-13151-042606-KK-172	S-13151-042606-KK-173	S-13151-042606-KK-174	S-13151-042606-KK-175
				Date Sampled:	4/26/2006	4/26/2006	4/26/2006	4/26/2006
				Sample Location:	Excavation 5 - Floor 3	Excavation 5 - Floor 4	Excavation 5 - Floor 5	Excavation 5 - Floor 6
				Sample Depth (feet bgs)	2	2	2	2
		0 - 2 feet bgs ⁽¹⁾	> 2 feet bgs ⁽²⁾					
<i>Metals</i>								
Aluminum	mg/kg	50,000	660,000	2770	3000	3060	4750	
Antimony	mg/kg	180	670	0.032 B, J	0.099 B, J	0.20 J	0.054 B, J	
Arsenic	mg/kg	9.4	61	2.6	6.5	8.6	5.9	
Barium	mg/kg	37,000	250,000	17.8	46.2	39.7	33.8	
Beryllium	mg/kg	410	3,100	ND (0.17)	0.053 B	0.044 B	0.10 B	
Cadmium	mg/kg	550	4,100	0.049	0.14	0.58	0.22	
Chromium Total	mg/kg	--	--	6.5	20	73.3	52.6	
Cobalt	mg/kg	2,600	18,000	3	5	13.7	12.2	
Copper	mg/kg	20,000	140,000	9.4	40.2	137	68.6	
Iron	mg/kg	160,000	1,000,000	7720 J	21000 J	124000 J	45700 J	
Lead	mg/kg	400	900	7.6	25.6	29.5	24.9	
Manganese	mg/kg	25,000	170,000	408 J	978 J	2690 J	880 J	
Mercury	mg/kg	160	1,100	ND (0.042)	0.028 B	0.033 B	0.040 B	
Nickel	mg/kg	40,000	270,000	7.5	22	68.7	52.5	
Selenium	mg/kg	2,600	18,000	ND (0.17)	ND (0.17)	ND (0.18)	ND (0.18)	
Silver	mg/kg	2,500	17,000	0.030 B	0.12	0.19	0.095	
Thallium	mg/kg	35	240	0.022 B	0.017 B	0.039 B	0.041 B	
Vanadium	mg/kg	750	10,000	7.6	10.2	13.3	16.1	
Zinc	mg/kg	170,000	1,000,000	20.2 J	38.4 J	58.2 J	50.8 J	

TABLE 2

**SUMMARY OF PRELIMINARY SOIL CLEANUP VERIFICATION SAMPLING ANALYTICAL RESULTS
FORMER ROCKWELL INTERNATIONAL CORPORATION
ALLEGAN, MICHIGAN**

Selected Parameters		Soil Cleanup Criteria		Sample ID:	S-13151-042606-KK-180	S-13151-042606-KK-181	S-13151-042606-KK-182	S-13151-042706-KK-183
				Date Sampled:	4/26/2006	4/26/2006	4/26/2006	4/27/2006
				Sample Location:	Excavation 5 - Wall 3	Excavation 5 - Wall 4	Excavation 5 - Wall 5	Excavation 7 - Wall 1
				Sample Depth (feet bgs)	0-2	0-2	0-2	approx. 1
		0 - 2 feet bgs ⁽¹⁾	> 2 feet bgs ⁽²⁾					
<i>Metals</i>								
Aluminum	mg/kg	50,000	660,000	9460	3820	2670	1080	
Antimony	mg/kg	180	670	1.7 J	0.099 B, J	0.023 B, J	0.69 J	
Arsenic	mg/kg	9.4	61	14.2	6.3	4.4	15.6	
Barium	mg/kg	37,000	250,000	222	39.7	16.6	35.1	
Beryllium	mg/kg	410	3,100	0.27	0.079 B	ND (0.17)	ND (0.17)	
Cadmium	mg/kg	550	4,100	0.64	0.54	0.1	0.091	
Chromium Total	mg/kg	--	--	98	115	32.3	354	
Cobalt	mg/kg	2,600	18,000	26.8	15.9	15.7	21.3	
Copper	mg/kg	20,000	140,000	170	262	35.7	298	
Iron	mg/kg	160,000	1,000,000	446000 J	81000 J	30000 J	285000 J	
Lead	mg/kg	400	900	406	46.4	16.7	24	
Manganese	mg/kg	25,000	170,000	8140 J	1710 J	593 J	4240 J	
Mercury	mg/kg	160	1,100	0.035 B	0.07	0.029 B	0.042 J	
Nickel	mg/kg	40,000	270,000	65.2	91.2	33.7	190	
Selenium	mg/kg	2,600	18,000	ND (0.18)	ND (0.17)	ND (0.17)	ND (0.33) G	
Silver	mg/kg	2,500	17,000	0.71	0.28	0.035 B	0.13	
Thallium	mg/kg	35	240	0.038 B	0.027 B	0.028 B	0.016 B	
Vanadium	mg/kg	750	10,000	171	20.2	11.4	9.9	
Zinc	mg/kg	170,000	1,000,000	46.7 J	55.6 J	39.8 J	17.4 J	

TABLE 2

**SUMMARY OF PRELIMINARY SOIL CLEANUP VERIFICATION SAMPLING ANALYTICAL RESULTS
FORMER ROCKWELL INTERNATIONAL CORPORATION
ALLEGAN, MICHIGAN**

Selected Parameters		Soil Cleanup Criteria					
		0 - 2 feet bgs ⁽¹⁾		> 2 feet bgs ⁽²⁾			
		Sample ID:	Date Sampled:	Sample Location:	Sample Depth (feet bgs)		
		S-13151-042706-KK-184	4/27/2006	Excavation 7 - Floor 1 approx. 2	S-13151-042706-KK-185 4/27/2006 Excavation 7 - Floor 2 approx. 2	S-13151-042706-KK-186 4/27/2006 Excavation 7 - Floor 3 approx. 2	S-13151-042706-KK-187 4/27/2006 Excavation 7 - Floor 4 approx. 2
Metals							
Aluminum	mg/kg	50,000	660,000	3660	3790	2280	1770
Antimony	mg/kg	180	670	0.20 J	0.18 J	0.12 B, J	0.54 J
Arsenic	mg/kg	9.4	61	5.1	4.9	4	6.8
Barium	mg/kg	37,000	250,000	240	152	73.2	26.5
Beryllium	mg/kg	410	3,100	0.23	0.23	0.11 B	0.042 B
Cadmium	mg/kg	550	4,100	0.65	0.75	0.47	0.18
Chromium Total	mg/kg	--	--	11	13.5	6.6	284
Cobalt	mg/kg	2,600	18,000	3.5	3.7	2.4	25.8
Copper	mg/kg	20,000	140,000	38.6	29.5	19.7	195
Iron	mg/kg	160,000	1,000,000	15100 J	18900 J	8840 J	262000 J
Lead	mg/kg	400	900	387	113	69.8	66.4
Manganese	mg/kg	25,000	170,000	451 J	494 J	228 J	3520 J
Mercury	mg/kg	160	1,100	0.20 J	0.25 J	0.21 J	0.056 J
Nickel	mg/kg	40,000	270,000	13.2	13.6	6.9	170
Selenium	mg/kg	2,600	18,000	0.23	0.23	0.24	ND (0.35) G
Silver	mg/kg	2,500	17,000	0.73	0.41	0.14	0.21
Thallium	mg/kg	35	240	0.063 B	0.060 B	0.050 B	0.016 B
Vanadium	mg/kg	750	10,000	10	10.4	6.5	27.2
Zinc	mg/kg	170,000	1,000,000	181 J		136 J	27.6 J

TABLE 2

**SUMMARY OF PRELIMINARY SOIL CLEANUP VERIFICATION SAMPLING ANALYTICAL RESULTS
FORMER ROCKWELL INTERNATIONAL CORPORATION
ALLEGAN, MICHIGAN**

Selected Parameters		Soil Cleanup Criteria											
		0 - 2 feet bgs ⁽¹⁾		> 2 feet bgs ⁽²⁾									
		Sample ID:	Date Sampled:	Sample Location:	Sample Depth (feet bgs)								
		S-13151-042706-KK-188	4/27/2006	Excavation 7 - Floor 5 approx. 2	S-13151-042706-KK-189	4/27/2006	Excavation 7 - Floor 5 approx. 2	S-13151-042706-KK-190	4/27/2006	Excavation 7 - Floor 6 approx. 2	S-13151-042706-KK-191	4/27/2006	Excavation 7 - Floor 7 approx. 2
Metals													
Aluminum	mg/kg	50,000	660,000	1540	3190	3530	3340						
Antimony	mg/kg	180	670	0.028 B, J	0.023 B, J	0.19 J	0.21 J						
Arsenic	mg/kg	9.4	61	1.5	1.8	6.8	5.7						
Barium	mg/kg	37,000	250,000	12.8	21.9	97.8	230						
Beryllium	mg/kg	410	3,100	ND (0.17)	ND (0.17)	0.043 B	0.11 B						
Cadmium	mg/kg	550	4,100	0.032 B	0.032 B	0.6	0.54						
Chromium Total	mg/kg	--	--	16.3	5.9	28.3	49.9						
Cobalt	mg/kg	2,600	18,000	3.1	2.4	5.5	6.9						
Copper	mg/kg	20,000	140,000	10.6	5.8	19.3	74.7						
Iron	mg/kg	160,000	1,000,000	14800 J	6840 J	16300 J	57900 J						
Lead	mg/kg	400	900	5	4.1	52.9	88.5						
Manganese	mg/kg	25,000	170,000	249 J	168 J	368 J	965 J						
Mercury	mg/kg	160	1,100	0.044 J	0.046 J	0.13 J	0.18 J						
Nickel	mg/kg	40,000	270,000	8	5.6	72.1	37.2						
Selenium	mg/kg	2,600	18,000	ND (0.17)	ND (0.17)	0.24	0.19						
Silver	mg/kg	2,500	17,000	ND (0.084)	ND (0.086)	0.14	0.18						
Thallium	mg/kg	35	240	0.024 B	0.025 B	0.078 B	0.051 B						
Vanadium	mg/kg	750	10,000	6.4	8.4	10.5	11.5						
Zinc	mg/kg	170,000	1,000,000	11.3 J	13.4 J	165 J	159 J						

**SUMMARY OF PRELIMINARY SOIL CLEANUP VERIFICATION SAMPLING ANALYTICAL RESULTS
FORMER ROCKWELL INTERNATIONAL CORPORATION
ALLEGAN, MICHIGAN**

Selected Parameters		Soil Cleanup Criteria					
		0 - 2 feet bgs ⁽¹⁾		> 2 feet bgs ⁽²⁾			
		Sample ID:	Date Sampled:	Sample Location:	Sample Depth (feet bgs)		
		S-13151-042706-KK-192	S-13151-042706-KK-193	S-13151-042706-KK-194	S-13151-042706-KK-195		
		4/27/2006	4/27/2006	4/27/2006	4/27/2006		
		Excavation 7 - Floor 8	Excavation 7 - Floor 9	Excavation 7 - Floor 10	Excavation 7 - Floor 11		
		approx. 2	approx. 2	approx. 2	approx. 2		
Metals							
Aluminum	mg/kg	50,000	660,000	2950	2360	3300	4540
Antimony	mg/kg	180	670	0.21 J	0.056 B, J	ND (0.17)	0.039 B, J
Arsenic	mg/kg	9.4	61	7.8	2	2	8
Barium	mg/kg	37,000	250,000	111	16.1	23.1	188
Beryllium	mg/kg	410	3,100	0.15 B	ND (0.17)	ND (0.17)	0.18
Cadmium	mg/kg	550	4,100	0.5	0.040 B	0.034 B	0.35
Chromium Total	mg/kg	--	--	204	17	5.5	19.8
Cobalt	mg/kg	2,600	18,000	18.3	3.4	2.7	5.2
Copper	mg/kg	20,000	140,000	122	11.2	5.3	28.5
Iron	mg/kg	160,000	1,000,000	159000 J	16400 J	7360 J	29300 J
Lead	mg/kg	400	900	93.6	6.7	4.4	38.4
Manganese	mg/kg	25,000	170,000	2030 J	273 J	173 J	719 J
Mercury	mg/kg	160	1,100	0.12 J	0.044 J	0.048 J	0.13 J
Nickel	mg/kg	40,000	270,000	79.3	10.4	5.7	21.8
Selenium	mg/kg	2,600	18,000	0.12 B	ND (0.17)	ND (0.17)	0.23
Silver	mg/kg	2,500	17,000	0.15	ND (0.085)	ND (0.085)	0.11
Thallium	mg/kg	35	240	0.044 B	0.022 B	0.028 B	0.051 B
Vanadium	mg/kg	750	10,000	16.8	8	9.3	13.1
Zinc	mg/kg	170,000	1,000,000	198 J	12.6 J	15.9 J	84.0 J

**SUMMARY OF PRELIMINARY SOIL CLEANUP VERIFICATION SAMPLING ANALYTICAL RESULTS
FORMER ROCKWELL INTERNATIONAL CORPORATION
ALLEGAN, MICHIGAN**

Selected Parameters		Soil Cleanup Criteria					
		0 - 2 feet bgs ⁽¹⁾		> 2 feet bgs ⁽²⁾			
		Sample ID:	Date Sampled:	Sample Location:	Sample Depth (feet bgs)		
		S-13151-042706-KK-196	S-13151-042706-KK-197	S-13151-042706-KK-198	S-13151-042706-KK-199		
		4/27/2006	4/27/2006	4/27/2006	4/27/2006		
		Excavation 7 - Floor 12	Excavation 7 - Floor 13	Excavation 7 - Floor 14	Excavation 7 - Floor 15		
		approx. 2	2	approx. 2	2		
Metals							
Aluminum	mg/kg	50,000	660,000	3020	2710	2640	3350
Antimony	mg/kg	180	670	0.044 B, J	0.036 B, J	0.32 J	0.98 J
Arsenic	mg/kg	9.4	61	4	4.5	10.7	14.8
Barium	mg/kg	37,000	250,000	63.2	88.1	63.5	60.4
Beryllium	mg/kg	410	3,100	ND (0.18)	0.067 B	0.18	0.14 B
Cadmium	mg/kg	550	4,100	0.35	0.35	0.37	0.53
Chromium Total	mg/kg	--	--	7.7	24.8	357	526
Cobalt	mg/kg	2,600	18,000	3.2	4.2	38.8	62
Copper	mg/kg	20,000	140,000	13.1	24	209	419
Iron	mg/kg	160,000	1,000,000	10900 J	27300 J	260000 J	327000 J
Lead	mg/kg	400	900	27.6	58.5	72.9	80.2
Manganese	mg/kg	25,000	170,000	304 J	494 J	3660 J	4350 J
Mercury	mg/kg	160	1,100	0.18 J	0.068 J	0.049 J	0.056 J
Nickel	mg/kg	40,000	270,000	7.7	15.6	167	477
Selenium	mg/kg	2,600	18,000	0.16 B	0.19	ND (0.18)	ND (0.18)
Silver	mg/kg	2,500	17,000	0.22	0.12	0.25	0.25
Thallium	mg/kg	35	240	0.042 B	0.046 B	0.022 B	0.023 B
Vanadium	mg/kg	750	10,000	8.3	7.8	46.7	36.7
Zinc	mg/kg	170,000	1,000,000	105 J	73.6 J	48.0 J	57.7 J

TABLE 2

**SUMMARY OF PRELIMINARY SOIL CLEANUP VERIFICATION SAMPLING ANALYTICAL RESULTS
FORMER ROCKWELL INTERNATIONAL CORPORATION
ALLEGAN, MICHIGAN**

Selected Parameters		Soil Cleanup Criteria					
		0 - 2 feet bgs ⁽¹⁾		> 2 feet bgs ⁽²⁾			
		Sample ID:	Date Sampled:	Sample Location:	Sample Depth (feet bgs)		
		S-13151-042706-KK-200	S-13151-042706-KK-201	S-13151-042706-KK-202	S-13151-042706-KK-203		
		4/27/2006	4/27/2006	4/27/2006	4/27/2006		
		Excavation 7 - Floor 15	Excavation 7 - Floor 16	Excavation 7 - Floor 17	Excavation 7 - Floor 18		
		approx. 2	approx. 2	approx. 2	approx. 2		
Metals							
Aluminum	mg/kg	50,000	660,000	2440	4240	1990	3530
Antimony	mg/kg	180	670	0.76 J	0.67 J	1.2 J	0.31
Arsenic	mg/kg	9.4	61	14.9	8.9	4.8	11.4
Barium	mg/kg	37,000	250,000	47.9	105	143	77.5
Beryllium	mg/kg	410	3,100	0.10 B	0.14 B	0.051 B	0.18 B
Cadmium	mg/kg	550	4,100	1.2	0.6	0.39	0.62
Chromium Total	mg/kg	--	--	434	395	386	234
Cobalt	mg/kg	2,600	18,000	64.5	35.5	33.2	26.5
Copper	mg/kg	20,000	140,000	460	329	251	232
Iron	mg/kg	160,000	1,000,000	315000 J	348000 J	283000 J	197000 J
Lead	mg/kg	400	900	63.4	92.9	93.2	104
Manganese	mg/kg	25,000	170,000	4330 J	4700 J	3480 J	2940 J
Mercury	mg/kg	160	1,100	0.054 J	0.092 J	0.086 J	0.48
Nickel	mg/kg	40,000	270,000	399	300	305	158
Selenium	mg/kg	2,600	18,000	ND (0.18)	ND (0.19)	ND (0.18)	ND (0.19)
Silver	mg/kg	2,500	17,000	3.2	0.17	0.22	0.89
Thallium	mg/kg	35	240	0.021 B	0.031 B	0.019 B	0.041 B
Vanadium	mg/kg	750	10,000	37.3	27.1	24.6	23.5
Zinc	mg/kg	170,000	1,000,000	47.8 J	55.5 J	36.8 J	85.9 J

TABLE 2

**SUMMARY OF PRELIMINARY SOIL CLEANUP VERIFICATION SAMPLING ANALYTICAL RESULTS
FORMER ROCKWELL INTERNATIONAL CORPORATION
ALLEGAN, MICHIGAN**

Selected Parameters		Soil Cleanup Criteria					
		0 - 2 feet bgs ⁽¹⁾		> 2 feet bgs ⁽²⁾			
		Sample ID:	Date Sampled:	Sample Location:	Sample Depth (feet bgs)		
		S-13151-042706-KK-204	S-13151-042706-KK-205	S-13151-042706-KK-206	S-13151-042706-KK-207		
		4/27/2006	4/27/2006	4/27/2006	4/27/2006		
		Excavation 7 - Floor 19	Excavation 7 - Wall 2	Excavation 7 - Floor 20	Excavation 7 - Floor 21		
		approx. 2	approx. 1	approx. 2	approx. 2		
<i>Metals</i>							
Aluminum	mg/kg	50,000	660,000	1450	1610	3470	3220
Antimony	mg/kg	180	670	1.2	0.63	1	0.8
Arsenic	mg/kg	9.4	61	11.9	13	12.9	8.2
Barium	mg/kg	37,000	250,000	27	61.5	20.3	36.1
Beryllium	mg/kg	410	3,100	0.26	0.047 B	0.15 B	0.068 B
Cadmium	mg/kg	550	4,100	0.53	0.27	0.5	1.5
Chromium Total	mg/kg	--	--	606	286	368	334
Cobalt	mg/kg	2,600	18,000	81.9	28.4	36.6	33.9
Copper	mg/kg	20,000	140,000	327	245	387	283
Iron	mg/kg	160,000	1,000,000	497000 J	271000 J	285000 J	247000 J
Lead	mg/kg	400	900	191	43.1	48.4	54.3
Manganese	mg/kg	25,000	170,000	7260 J	4040 J	4150 J	3490 J
Mercury	mg/kg	160	1,100	0.043 B	0.069	0.048 B	0.087
Nickel	mg/kg	40,000	270,000	327	229	404	296
Selenium	mg/kg	2,600	18,000	ND (0.20)	ND (0.18)	ND (0.20)	ND (0.17)
Silver	mg/kg	2,500	17,000	0.35	0.17	0.26	3.7
Thallium	mg/kg	35	240	0.022 B	0.017 B	0.026 B	0.023 B
Vanadium	mg/kg	750	10,000	64.5	9.9	22.2	30.4
Zinc	mg/kg	170,000	1,000,000	46.1 J	78.0 J	63.3 J	61.6 J

TABLE 2

**SUMMARY OF PRELIMINARY SOIL CLEANUP VERIFICATION SAMPLING ANALYTICAL RESULTS
FORMER ROCKWELL INTERNATIONAL CORPORATION
ALLEGAN, MICHIGAN**

Selected Parameters		Soil Cleanup Criteria					
		0 - 2 feet bgs ⁽¹⁾		> 2 feet bgs ⁽²⁾			
		Sample ID:	Date Sampled:	Sample Location:	Sample Depth (feet bgs)		
		S-13151-042706-KK-208	S-13151-042706-KK-209	S-13151-042706-KK-210	S-13151-042706-KK-211		
		4/27/2006	4/27/2006	4/27/2006	4/27/2006		
		Excavation 7 - Floor 22	Excavation 7 - Floor 23	Excavation 7 - Floor 24	Excavation 7 - Floor 24		
		approx. 2	approx. 2	approx. 2	approx. 2		
Metals							
Aluminum	mg/kg	50,000	660,000	4250	2340	3760	3110
Antimony	mg/kg	180	670	1.1	0.10 B	0.28	0.24 J
Arsenic	mg/kg	9.4	61	9	3.9	5.4	6.6
Barium	mg/kg	37,000	250,000	42.5	167	184	166
Beryllium	mg/kg	410	3,100	ND (0.17)	ND (0.17)	0.13 B	0.085 b
Cadmium	mg/kg	550	4,100	0.52	0.16	0.38	0.42
Chromium Total	mg/kg	--	--	199	127	196	223
Cobalt	mg/kg	2,600	18,000	38	12.4	40.3	47.4
Copper	mg/kg	20,000	140,000	177	91.5	91.3	118
Iron	mg/kg	160,000	1,000,000	291000	109000	98300	152000 J
Lead	mg/kg	400	900	59.1	34.8	51.8	56.7
Manganese	mg/kg	25,000	170,000	3570 J	1820 J	1430 J	2030 J
Mercury	mg/kg	160	1,100	0.17 J	0.054 J	0.12 J	0.047
Nickel	mg/kg	40,000	270,000	167	80.4	89.9	151
Selenium	mg/kg	2,600	18,000	ND (0.17)	ND (0.17)	ND (0.18)	ND (0.18)
Silver	mg/kg	2,500	17,000	0.21	0.036 B	0.13	0.13
Thallium	mg/kg	35	240	0.027 B	0.033 B	0.036 B	0.031 B
Vanadium	mg/kg	750	10,000	26.5	11.1	44.2	38.7
Zinc	mg/kg	170,000	1,000,000	33.0 J	46.1 J	53.7 J	92.4

TABLE 2

**SUMMARY OF PRELIMINARY SOIL CLEANUP VERIFICATION SAMPLING ANALYTICAL RESULTS
FORMER ROCKWELL INTERNATIONAL CORPORATION
ALLEGAN, MICHIGAN**

Selected Parameters		Soil Cleanup Criteria					
		0 - 2 feet bgs ⁽¹⁾		> 2 feet bgs ⁽²⁾			
		Sample ID:	Date Sampled:	Sample Location:	Sample Depth (feet bgs)		
		S-13151-042706-KK-212	S-13151-042706-KK-213	S-13151-042706-KK-214	S-13151-042706-KK-215		
		4/27/2006	4/27/2006	4/27/2006	4/27/2006		
		Excavation 7 - Floor 25	Excavation 7 - Floor 26	Excavation 7 - Floor 27	Excavation 7 - Floor 28		
		approx. 2	approx. 2	approx. 2	approx. 2		
Metals							
Aluminum	mg/kg	50,000	660,000	1690	3240	3220	5560
Antimony	mg/kg	180	670	090 J	0.27 J	0.29 J	0.32 J
Arsenic	mg/kg	9.4	61	7.9	8.3	10.5	6.4
Barium	mg/kg	37,000	250,000	105	26.8	34	34.1
Beryllium	mg/kg	410	3,100	0.10 B	0.13 B	0.19	0.18
Cadmium	mg/kg	550	4,100	0.63	0.91	0.41	0.34
Chromium Total	mg/kg	--	--	417	246	228	180
Cobalt	mg/kg	2,600	18,000	55.8	29.6	30.4	14.4
Copper	mg/kg	20,000	140,000	205	308	255	94.8
Iron	mg/kg	160,000	1,000,000	285000 J	272000 J	246000 J	166000 J
Lead	mg/kg	400	900	168	35.6	61.6	39.5
Manganese	mg/kg	25,000	170,000	3490 J	3470 J	3460 J	2430 J
Mercury	mg/kg	160	1,100	0.030 B	0.37	0.14	0.036 B
Nickel	mg/kg	40,000	270,000	207	242	215	102
Selenium	mg/kg	2,600	18,000	ND (0.21)	ND (0.19)	ND (0.19)	ND (0.18)
Silver	mg/kg	2,500	17,000	0.2	0.16	0.14	0.1
Thallium	mg/kg	35	240	ND (0.21)	0.0094 B	0.0063 B	0.031 B
Vanadium	mg/kg	750	10,000	ND (0.10)	29.8	22.8	22.8
Zinc	mg/kg	170,000	1,000,000	40.5	63.5	61.6	104

TABLE 2

**SUMMARY OF PRELIMINARY SOIL CLEANUP VERIFICATION SAMPLING ANALYTICAL RESULTS
FORMER ROCKWELL INTERNATIONAL CORPORATION
ALLEGAN, MICHIGAN**

Selected Parameters		Soil Cleanup Criteria					
		0 - 2 feet bgs ⁽¹⁾		> 2 feet bgs ⁽²⁾			
		Sample ID:	Date Sampled:	Sample Location:	Sample Depth (feet bgs)		
		S-13151-042706-KK-216	S-13151-042706-KK-217	S-13151-042706-KK-218	S-13151-042706-KK-219		
		4/27/2006	4/27/2006	4/27/2006	4/27/2006		
		Excavation 7 - Floor 29	Excavation 7 - Floor 30	Excavation 7 - Floor 31	Excavation 7 - Floor 32		
		approx. 2	approx. 2	approx. 2	approx. 2		
<i>Metals</i>							
Aluminum	mg/kg	50,000	660,000	4160	2570	2550	3050
Antimony	mg/kg	180	670	0.92 J	0.30 J	0.34 J	0.61 J
Arsenic	mg/kg	9.4	61	8.3	7.3	9.3	7.4
Barium	mg/kg	37,000	250,000	35.1	74.9	87.6	262
Beryllium	mg/kg	410	3,100	0.12 B	0.093 B	0.10 B	0.12 B
Cadmium	mg/kg	550	4,100	0.75	0.35	0.57	0.82
Chromium Total	mg/kg	--	--	463	214	332	283
Cobalt	mg/kg	2,600	18,000	35.8	29.7	26.6	23.6
Copper	mg/kg	20,000	140,000	266	141	213	849
Iron	mg/kg	160,000	1,000,000	327000 J	183000 J	261000 J	175000 J
Lead	mg/kg	400	900	112	65.8	63.6	244
Manganese	mg/kg	25,000	170,000	4240 J	2440 J	3450 J	2230 J
Mercury	mg/kg	160	1,100	0.086	0.069	0.025 B	0.034 B
Nickel	mg/kg	40,000	270,000	334	345	245	271
Selenium	mg/kg	2,600	18,000	ND (0.17)	ND (0.18)	ND (0.19)	ND (0.18)
Silver	mg/kg	2,500	17,000	0.25	0.19	0.43	0.22
Thallium	mg/kg	35	240	0.032 B	0.029 B	0.029 B	0.047 B
Vanadium	mg/kg	750	10,000	34.5	68	20.1	21.5
Zinc	mg/kg	170,000	1,000,000	41.2	39.4	43.6	65.6

TABLE 2

**SUMMARY OF PRELIMINARY SOIL CLEANUP VERIFICATION SAMPLING ANALYTICAL RESULTS
FORMER ROCKWELL INTERNATIONAL CORPORATION
ALLEGAN, MICHIGAN**

Selected Parameters		Soil Cleanup Criteria					
		0 - 2 feet bgs ⁽¹⁾		> 2 feet bgs ⁽²⁾			
		Sample ID:	Date Sampled:	Sample Location:	Sample Depth (feet bgs)		
		S-13151-042706-KK-220	S-13151-042706-KK-221	S-13151-042706-KK-222	S-13151-042706-KK-223		
		4/27/2006	4/27/2006	4/27/2006	4/27/2006		
		Excavation 7 - Floor 32	Excavation 7 - Floor 33	Excavation 7 - Floor 34	Excavation 7 - Floor 35		
		approx. 2	approx. 2	approx. 2	approx. 2		
Metals							
Aluminum	mg/kg	50,000	660,000	3450	2650	3110	3130
Antimony	mg/kg	180	670	0.38 J	0.63 J	0.042 B, J	0.017 B, J
Arsenic	mg/kg	9.4	61	8.5	5.3	4.9	4.5
Barium	mg/kg	37,000	250,000	374	39.9	31.6	21.4
Beryllium	mg/kg	410	3,100	0.16 B	0.053 B	0.053 B	0.081 B
Cadmium	mg/kg	550	4,100	0.71	0.5	0.14	0.031 B
Chromium Total	mg/kg	--	--	251	280	26.4	6.3
Cobalt	mg/kg	2,600	18,000	24.7	23.1	4.7	3.8
Copper	mg/kg	20,000	140,000	209	164	19.8	12.4
Iron	mg/kg	160,000	1,000,000	179000 J	212000 J	26200 J	13600 J
Lead	mg/kg	400	900	97.4	83.2	29.4	12.1
Manganese	mg/kg	25,000	170,000	2450 J	3060 J	453 J	393 J
Mercury	mg/kg	160	1,100	0.069	0.052	ND (0.043)	ND (0.042)
Nickel	mg/kg	40,000	270,000	232	206	15.2	9.3
Selenium	mg/kg	2,600	18,000	ND (0.18)	ND (0.18)	ND (0.17)	ND (0.17)
Silver	mg/kg	2,500	17,000	0.43	0.12	0.15	ND (0.085)
Thallium	mg/kg	35	240	0.050 B	0.025 B	0.051 B	0.041 B
Vanadium	mg/kg	750	10,000	27.7	23.1	10.2	8.1
Zinc	mg/kg	170,000	1,000,000	77.7	41.2	33.6	33.6

TABLE 2

**SUMMARY OF PRELIMINARY SOIL CLEANUP VERIFICATION SAMPLING ANALYTICAL RESULTS
FORMER ROCKWELL INTERNATIONAL CORPORATION
ALLEGAN, MICHIGAN**

Selected Parameters		Soil Cleanup Criteria					
		0 - 2 feet bgs ⁽¹⁾		> 2 feet bgs ⁽²⁾			
		Sample ID:	Date Sampled:	Sample Location:	Sample Depth (feet bgs)		
		S-13151-042706-KK-224	S-13151-042706-KK-225	S-13151-042706-KK-226	S-13151-042706-KK-227		
		4/27/2006	4/27/2006	4/27/2006	4/27/2006		
		Excavation 7 - Floor 36	Excavation 7 - Floor 37	Excavation 7 - Floor 38	Excavation 7 - Floor 39		
		approx. 2	approx. 2	approx. 2	approx. 2		
Metals							
Aluminum	mg/kg	50,000	660,000	2580	3550	2090	2470
Antimony	mg/kg	180	670	0.096 B, J	ND (0.18)	0.26 J	0.31 J
Arsenic	mg/kg	9.4	61	6.8	8.4	5.9	8.5
Barium	mg/kg	37,000	250,000	31	21.1	33.3	37.1
Beryllium	mg/kg	410	3,100	ND (0.17)	0.096 B	ND (0.18)	0.067 B
Cadmium	mg/kg	550	4,100	0.1	0.052	0.19	0.3
Chromium Total	mg/kg	--	--	88.6	5.5	178	95.2
Cobalt	mg/kg	2,600	18,000	10.7	4.5	12.6	19.9
Copper	mg/kg	20,000	140,000	227	13.6	123	80.7
Iron	mg/kg	160,000	1,000,000	115000 J	14800 J	143000 J	85900 J
Lead	mg/kg	400	900	28.1	13.5	55.6	47
Manganese	mg/kg	25,000	170,000	1820 J	320 J	1740 J	1270 J
Mercury	mg/kg	160	1,100	0.019 B	0.016 B	0.019 B	0.033 B
Nickel	mg/kg	40,000	270,000	58.5	10.8	125	73.1
Selenium	mg/kg	2,600	18,000	ND (0.17)	ND (0.18)	ND (0.18)	ND (0.17)
Silver	mg/kg	2,500	17,000	0.052 B	ND (0.088)	0.088 B	0.15
Thallium	mg/kg	35	240	0.042 B	0.082 B	0.032 B	0.045 B
Vanadium	mg/kg	750	10,000	12	10.7	10.7	13.5
Zinc	mg/kg	170,000	1,000,000	32.5	48.8	33.4	59.6

TABLE 2

**SUMMARY OF PRELIMINARY SOIL CLEANUP VERIFICATION SAMPLING ANALYTICAL RESULTS
FORMER ROCKWELL INTERNATIONAL CORPORATION
ALLEGAN, MICHIGAN**

Selected Parameters		Soil Cleanup Criteria					
		0 - 2 feet bgs ⁽¹⁾		> 2 feet bgs ⁽²⁾			
		Sample ID:	Date Sampled:	Sample Location:	Sample Depth (feet bgs)		
		S-13151-042706-KK-228	S-13151-042706-KK-229	S-13151-042706-KK-230	S-13151-042706-KK-231		
		4/27/2006	4/27/2006	4/27/2006	4/27/2006		
		Excavation 7 - Floor 40	Excavation 7 - Floor 41	Excavation 7 - Floor 42	Excavation 7 - Floor 42		
		approx. 2	approx. 2	approx. 2	approx. 2		
Metals							
Aluminum	mg/kg	50,000	660,000	1870	3140	5750	1940
Antimony	mg/kg	180	670	0.29 J	0.21 J	0.19 J	0.14 B
Arsenic	mg/kg	9.4	61	8.7	8.7	8.4	6.2
Barium	mg/kg	37,000	250,000	18.5	33	27.1	24.7
Beryllium	mg/kg	410	3,100	0.11 B	0.11 B	0.18 B	0.040 B
Cadmium	mg/kg	550	4,100	0.26	0.14	0.81	0.44
Chromium Total	mg/kg	--	--	181	139	203	1030
Cobalt	mg/kg	2,600	18,000	15.8	13.1	33.6	43.9
Copper	mg/kg	20,000	140,000	144	121	162	593
Iron	mg/kg	160,000	1,000,000	211000 J	122000 J	120000 J	279000 J
Lead	mg/kg	400	900	42.8	30.7	118	70.7
Manganese	mg/kg	25,000	170,000	3070 J	1940 J	1820 J	2600 J
Mercury	mg/kg	160	1,100	ND (0.042)	0.020 B	0.027 B	0.025 B
Nickel	mg/kg	40,000	270,000	123	98.4	97.5	989
Selenium	mg/kg	2,600	18,000	ND (0.17)	ND (0.16)	ND (0.19)	ND (0.18)
Silver	mg/kg	2,500	17,000	0.099	0.068 B	0.23	0.68
Thallium	mg/kg	35	240	0.020 B	0.037 B	0.060 B	0.051 B
Vanadium	mg/kg	750	10,000	11.1	14.5	64.3	15.8
Zinc	mg/kg	170,000	1,000,000	61.6	101	81.5	62.8 J

**SUMMARY OF PRELIMINARY SOIL CLEANUP VERIFICATION SAMPLING ANALYTICAL RESULTS
FORMER ROCKWELL INTERNATIONAL CORPORATION
ALLEGAN, MICHIGAN**

Selected Parameters		Soil Cleanup Criteria					
		0 - 2 feet bgs ⁽¹⁾		> 2 feet bgs ⁽²⁾			
		Sample ID:	Date Sampled:	Sample Location:	Sample Depth (feet bgs)		
		S-13151-042706-KK-232	S-13151-042706-KK-233	S-13151-042706-KK-234	S-13151-042706-KK-235		
		4/27/2006	4/27/2006	4/27/2006	4/27/2006		
		Excavation 7 - Floor 43	Excavation 7 - Floor 44	Excavation 7 - Floor 45	Excavation 7 - Floor 46		
		approx. 2	approx. 2	approx. 2	approx. 2		
<i>Metals</i>							
Aluminum	mg/kg	50,000	660,000	3120	3980	2700	1950
Antimony	mg/kg	180	670	0.061 B	0.019 B	0.051 B	0.019 B
Arsenic	mg/kg	9.4	61	4.1	7.5	7.1	6.6
Barium	mg/kg	37,000	250,000	19.8	21.1	20.1	19.1
Beryllium	mg/kg	410	3,100	0.041 B	0.070 B	ND (0.17)	ND (.17)
Cadmium	mg/kg	550	4,100	0.13	0.06	0.082	0.054
Chromium Total	mg/kg	--	--	37.3	14.4	22	3.8
Cobalt	mg/kg	2,600	18,000	6.8	4.7	4.7	3.1
Copper	mg/kg	20,000	140,000	37.9	20.7	24.1	11.8
Iron	mg/kg	160,000	1,000,000	47800 J	18900 J	28800 J	11400 J
Lead	mg/kg	400	900	13.1	11.3	19.6	15.2
Manganese	mg/kg	25,000	170,000	721 J	389 J	504 J	286 J
Mercury	mg/kg	160	1,100	ND (0.041)	0.027 B	0.018 B	0.020 B
Nickel	mg/kg	40,000	270,000	35	14.9	20.3	7.4
Selenium	mg/kg	2,600	18,000	ND (0.17)	ND (0.17)	ND (0.17)	ND (0.17)
Silver	mg/kg	2,500	17,000	0.070 B	ND (0.087)	0.033 B	ND (0.084)
Thallium	mg/kg	35	240	0.035 B	0.074 B	0.054 B	0.076 B
Vanadium	mg/kg	750	10,000	9.7	9.7	8.8	7
Zinc	mg/kg	170,000	1,000,000	36.2 J	48.3 J	44.4 J	59.2 J

**SUMMARY OF PRELIMINARY SOIL CLEANUP VERIFICATION SAMPLING ANALYTICAL RESULTS
FORMER ROCKWELL INTERNATIONAL CORPORATION
ALLEGAN, MICHIGAN**

Selected Parameters		Soil Cleanup Criteria					
		0 - 2 feet bgs ⁽¹⁾		> 2 feet bgs ⁽²⁾			
		Sample ID:	Date Sampled:	Sample Location:	Sample Depth (feet bgs)		
		S-13151-042706-KK-236	S-13151-042706-KK-237	S-13151-042706-KK-238	S-13151-042706-KK-239		
		4/27/2006	4/27/2006	4/27/2006	4/27/2006		
		Excavation 7 - Floor 47	Excavation 7 - Floor 48	Excavation 7 - Floor 49	Excavation 7 - Floor 50		
		approx. 2	approx. 2	approx. 2	approx. 2		
Metals							
Aluminum	mg/kg	50,000	660,000	2040	2200	2100	2100
Antimony	mg/kg	180	670	ND (0.19)	ND (0.17)	ND (0.17)	0.017 B
Arsenic	mg/kg	9.4	61	3.4	4.7	4.9	6.5
Barium	mg/kg	37,000	250,000	13.6	16.2	16.8	15.6
Beryllium	mg/kg	410	3,100	ND (0.19)	ND (0.17)	ND (0.17)	0.040 B
Cadmium	mg/kg	550	4,100	0.034 B	0.034 B	0.045	0.044
Chromium Total	mg/kg	--	--	10	3.9	4	4.7
Cobalt	mg/kg	2,600	18,000	2.4	2.6	2.6	206
Copper	mg/kg	20,000	140,000	8360 J	10.6	8	10.2
Iron	mg/kg	160,000	1,000,000	ND (0.046)	11500 J	8530 J	9800 J
Lead	mg/kg	400	900	5.5	10	7.7	8.8
Manganese	mg/kg	25,000	170,000	254 J	303 J	241 J	268 J
Mercury	mg/kg	160	1,100	ND (0.046)	0.015 B	ND (0.042)	ND (0.042)
Nickel	mg/kg	40,000	270,000	5.4	7.1	6.1	5.9
Selenium	mg/kg	2,600	18,000	ND (0.19)	ND (0.17)	ND (0.17)	ND (0.17)
Silver	mg/kg	2,500	17,000	ND (0.093)	ND (0.084)	ND (0.084)	0.024 B
Thallium	mg/kg	35	240	0.036 B	0.044 B	0.047 B	0.049 B
Vanadium	mg/kg	750	10,000	7.1	6.5	6.8	6.5
Zinc	mg/kg	170,000	1,000,000	26.9 J	35.0 J	36.9 J	38.9 J

TABLE 2

**SUMMARY OF PRELIMINARY SOIL CLEANUP VERIFICATION SAMPLING ANALYTICAL RESULTS
FORMER ROCKWELL INTERNATIONAL CORPORATION
ALLEGAN, MICHIGAN**

Selected Parameters		Soil Cleanup Criteria					
		0 - 2 feet bgs ⁽¹⁾		> 2 feet bgs ⁽²⁾			
		Sample ID:	Date Sampled:	Sample Location:	Sample Depth (feet bgs)		
		S-13151-042706-KK-240	S-13151-042706-KK-241	S-13151-042706-KK-242	S-13151-042706-KK-243		
		4/27/2006	4/27/2006	4/27/2006	4/27/2006		
		Excavation 7 - Floor 51	Excavation 7 - Floor 52	Excavation 7 - Wall 3	Excavation 7 - Wall 4		
		approx. 2	approx. 2	approx. 1	approx. 1		
<i>Metals</i>							
Aluminum	mg/kg	50,000	660,000	1130	2120	3460	2170
Antimony	mg/kg	180	670	ND (0.17)	0.018 B	0.11 B	ND (0.17)
Arsenic	mg/kg	9.4	61	3.8	6.7	4.8	4.4
Barium	mg/kg	37,000	250,000	9.1	15.7	24.4	12.9
Beryllium	mg/kg	410	3,100	ND (0.17)	ND (0.17)	ND (0.17)	ND (0.17)
Cadmium	mg/kg	550	4,100	0.032 B	0.045	0.077	0.026 B
Chromium Total	mg/kg	--	--	3.1	4.9	6.3	3.8
Cobalt	mg/kg	2,600	18,000	1.8	3	4	2.3
Copper	mg/kg	20,000	140,000	6.8	11.5	10.8	8.3
Iron	mg/kg	160,000	1,000,000	5420 J	12100 J	10300 J	7980 J
Lead	mg/kg	400	900	6.8	12	17.4	7.5
Manganese	mg/kg	25,000	170,000	161 J	315 J	235 J	228 J
Mercury	mg/kg	160	1,100	ND (0.042)	0.030 B	ND (0.043)	0.017 B
Nickel	mg/kg	40,000	270,000	4.4	7.9	10.3	5.4
Selenium	mg/kg	2,600	18,000	ND (0.17)	ND (0.17)	ND (0.17)	ND (0.17)
Silver	mg/kg	2,500	17,000	ND (0.084)	ND (0.083)	ND (0.086)	ND (0.084)
Thallium	mg/kg	35	240	0.035 B	0.057 B	0.043 B	0.041 B
Vanadium	mg/kg	750	10,000	4.3	8.8	9	6.9
Zinc	mg/kg	170,000	1,000,000	25.8 J	42.0 J	140 J	29.1 J

**SUMMARY OF PRELIMINARY SOIL CLEANUP VERIFICATION SAMPLING ANALYTICAL RESULTS
FORMER ROCKWELL INTERNATIONAL CORPORATION
ALLEGAN, MICHIGAN**

<i>Selected Parameters</i>		<i>Soil Cleanup Criteria</i>			
		<i>0 - 2 feet bgs ⁽¹⁾</i>		<i>> 2 feet bgs ⁽²⁾</i>	
		<i>Sample ID:</i>	<i>Date Sampled:</i>	<i>Sample Location:</i>	<i>Sample Depth (feet bgs)</i>
		S-13151-042706-KK-244	4/27/2006	Excavation 7 - Wall 5 approx. 1	S-13151-042706-KK-245 4/27/2006 Excavation 7 - Wall 6 approx. 1
<i>Metals</i>					
Aluminum	mg/kg	50,000	660,000	2060	3500
Antimony	mg/kg	180	670	0.045 B	0.025 B
Arsenic	mg/kg	9.4	61	8.3	5.9
Barium	mg/kg	37,000	250,000	18.2	19.7
Beryllium	mg/kg	410	3,100	ND (0.17)	ND (0.17)
Cadmium	mg/kg	550	4,100	0.059	0.058
Chromium Total	mg/kg	--	--	80.3	14
Cobalt	mg/kg	2,600	18,000	6.4	4.2
Copper	mg/kg	20,000	140,000	72.7	16.3
Iron	mg/kg	160,000	1,000,000	79600 J	16600 J
Lead	mg/kg	400	900	20.4	11.7
Manganese	mg/kg	25,000	170,000	1140 J	349 J
Mercury	mg/kg	160	1,100	0.015 B	0.019 B
Nickel	mg/kg	40,000	270,000	38.4	15.5
Selenium	mg/kg	2,600	18,000	ND (0.17)	ND (0.17)
Silver	mg/kg	2,500	17,000	ND (0.084)	ND (0.087)
Thallium	mg/kg	35	240	0.064 B	0.062 B
Vanadium	mg/kg	750	10,000	7.6	9.9
Zinc	mg/kg	170,000	1,000,000	97.1 J	43.6 J

**SUMMARY OF PRELIMINARY SOIL CLEANUP VERIFICATION SAMPLING ANALYTICAL RESULTS
FORMER ROCKWELL INTERNATIONAL CORPORATION
ALLEGAN, MICHIGAN**

Notes:

⁽¹⁾ - Michigan Act 451, Part 201, Rule 746, Table 2. Soil: Residential and

⁽²⁾ - Michigan Act 451, Part 201, Rule 748, Table 3. Soil: Industrial and

bgs - below ground surface.

µg/kg - micrograms per gram.

mg/kg - milligrams per kilogram.

pg/g - picograms per gram.

J - Method blank contamination.

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

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

E - Matrix Interference.

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

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

1.00	- Parameter exceeds Soil Cleanup Criteria for >2 feet bgs as defined in (2)
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G - Elevated reporting limit. The reporting limit is elevated due to matrix interference.

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

Sample ID	Collection Date (mm/dd/yy)	Sample Location	Sample Depth	LNAPL Soil Test Requirements	
				Pass	Fail
LPL-13151-041106-KK-068	April 11, 2006	Excavation Area 10	10-13 ft bgs	X	
LPL-13151-041106-KK-069	April 11, 2006	Excavation Area 10	-14 ft bgs	X	
LPL-13151-041106-KK-070	April 11, 2006	Excavation Area 10	10-13 ft bgs	X	
LPL-13151-041106-KK-071	April 11, 2006	Excavation Area 10	10-13 ft bgs	X	
LPL-13151-041106-KK-072	April 11, 2006	Excavation Area 10	-13 ft bgs	X	
LPL-13151-041306-KK-073	April 11, 2006	Excavation Area 10	11-13 ft bgs	X	
LPL-13151-041306-KK-074	April 11, 2006	Excavation Area 10	-12 ft bgs	X	
LPL-13151-041706-KK-075	April 11, 2006	Excavation Area 10	-13 ft bgs	X	
LPL-13151-041706-KK-076	April 11, 2006	Excavation Area 10	-11-12 ft bgs	X	
LPL-13151-041706-KK-077	April 11, 2006	Excavation Area 10	10-13 ft bgs	X	
LPL-13151-041706-KK-078	April 11, 2006	Excavation Area 10	-13 ft bgs	X	
LPL-13151-041706-KK-079	April 11, 2006	Excavation Area 10	11-14 ft bgs	X	
LPL-13151-041706-KK-080	April 11, 2006	Excavation Area 10	14 ft bgs	X	
LPL-13151-041806-KK-081	April 18, 2006	Excavation Area 12	8-12 ft bgs	X	
LPL-13151-041806-KK-082	April 18, 2006	Excavation Area 12	-12 ft bgs	X	
LPL-13151-041806-KK-083	April 18, 2006	Excavation Area 12	8-12 ft bgs	X	
LPL-13151-041806-KK-084	April 18, 2006	Excavation Area 12	8-12 ft bgs	X	
LPL-13151-041806-KK-085	April 18, 2006	Excavation Area 12	8-12 ft bgs	X	
LPL-13151-041806-KK-086	April 18, 2006	Excavation Area 12	-12 ft bgs	X	
LPL-13151-042006-KK-087	April 18, 2006	Excavation Area 12	8-12 ft bgs	X	
LPL-13151-042106-KK-088	April 21, 2006	Excavation Area 13	6-9 ft bgs	X	
LPL-13151-042106-KK-089	April 21, 2006	Excavation Area 13	-10 ft bgs	X	
LPL-13151-042106-KK-090	April 21, 2006	Excavation Area 13	-10 ft bgs	X	
LPL-13151-042106-KK-091	April 21, 2006	Excavation Area 13	-10 ft bgs	X	
LPL-13151-042106-KK-092	April 21, 2006	Excavation Area 13	-10 ft bgs	X	
LPL-13151-042106-KK-093	April 21, 2006	Excavation Area 13	-10 ft bgs	X	
LPL-13151-042106-KK-094	April 21, 2006	Excavation Area 13	-10 ft bgs	X	
LPL-13151-042106-KK-095	April 21, 2006	Excavation Area 13	-10 ft bgs	X	
LPL-13151-042106-KK-096	April 21, 2006	Excavation Area 13	-10 ft bgs	X	
LPL-13151-042106-KK-097	April 21, 2006	Excavation Area 13	-10 ft bgs	X	
LPL-13151-042106-KK-098	April 21, 2006	Excavation Area 13	-10 ft bgs	X	
LPL-13151-042106-KK-099	April 21, 2006	Excavation Area 13	6-9 ft bgs	X	
LPL-13151-042106-KK-100	April 21, 2006	Excavation Area 13	-10 ft bgs	X	
LPL-13151-042406-KK-101	April 24, 2006	Excavation Area 13	-10 ft bgs	X	
LPL-13151-042406-KK-102	April 24, 2006	Excavation Area 13	-10 ft bgs	X	
LPL-13151-042406-KK-103	April 24, 2006	Excavation Area 13	-10 ft bgs	X	
LPL-13151-042406-KK-104	April 24, 2006	Excavation Area 13	-10 ft bgs	X	
LPL-13151-042406-KK-105	April 24, 2006	Excavation Area 13	-10 ft bgs	X	
LPL-13151-042406-KK-106	April 24, 2006	Excavation Area 13	-10 ft bgs	X	
LPL-13151-042406-KK-107	April 24, 2006	Excavation Area 13	-10 ft bgs	X	
LPL-13151-042406-KK-108	April 24, 2006	Excavation Area 13	-10 ft bgs	X	
LPL-13151-042406-KK-109	April 24, 2006	Excavation Area 13	-10 ft bgs	X	
LPL-13151-042406-KK-110	April 24, 2006	Excavation Area 13	6-9 ft bgs	X	
LPL-13151-042606-KK-111	April 26, 2006	Excavation Area 13	-10 ft bgs	X	
LPL-13151-042606-KK-112	April 26, 2006	Excavation Area 13	-10 ft bgs	X	
LPL-13151-042606-KK-113	April 26, 2006	Excavation Area 13	-10 ft bgs	X	
LPL-13151-042606-KK-114	April 26, 2006	Excavation Area 13	-10 ft bgs	X	
LPL-13151-042606-KK-115	April 26, 2006	Excavation Area 13	-10 ft bgs	X	
LPL-13151-042606-KK-116	April 26, 2006	Excavation Area 13	-10 ft bgs	X	
LPL-13151-042606-KK-117	April 26, 2006	Excavation Area 13	-10 ft bgs	X	
LPL-13151-042606-KK-118	April 26, 2006	Excavation Area 13	-10 ft bgs	X	
LPL-13151-042606-KK-119	April 26, 2006	Excavation Area 13	-10 ft bgs	X	
LPL-13151-042706-KK-120	April 27, 2006	Excavation Area 13	6-9 ft bgs	X	
LPL-13151-042706-KK-121	April 27, 2006	Excavation Area 13	-10 ft bgs	X	
LPL-13151-042706-KK-122	April 27, 2006	Excavation Area 13	-11 ft bgs	X	
LPL-13151-042706-KK-123	April 27, 2006	Excavation Area 13	-11 ft bgs	X	
LPL-13151-042706-KK-124	April 27, 2006	Excavation Area 13	-11 ft bgs	X	
LPL-13151-042706-KK-125	April 27, 2006	Excavation Area 13	-11 ft bgs	X	
LPL-13151-042806-KK-126	April 28, 2006	Excavation Area 13	-11 ft bgs	X	
LPL-13151-042806-KK-127	April 28, 2006	Excavation Area 13	-11 ft bgs	X	
LPL-13151-042806-KK-128	April 28, 2006	Excavation Area 13	-11 ft bgs	X	
LPL-13151-042806-KK-129	April 28, 2006	Excavation Area 13	-11 ft bgs	X	
LPL-13151-042806-KK-130	April 28, 2006	Excavation Area 13	-11 ft bgs	X	
LPL-13151-042806-KK-131	April 28, 2006	Excavation Area 13	-11 ft bgs	X	
LPL-13151-042806-KK-132	April 28, 2006	Excavation Area 13	-11 ft bgs	X	
LPL-13151-042806-KK-133	April 28, 2006	Excavation Area 13	-11 ft bgs	X	
LPL-13151-042806-KK-134	April 28, 2006	Excavation Area 13	-11 ft bgs	X	
LPL-13151-042806-KK-135	April 28, 2006	Excavation Area 13	-11 ft bgs	X	

Notes:

ft bgs - feet below ground surface.



**CONESTOGA-ROVERS
& ASSOCIATES**

June 12, 2006

Reference No. 13151-10

Mr. Mazin Enwiya
United States Environmental Protection Agency
Region 5
77 West Jackson Boulevard (SR-6J)
Chicago, IL 60604-3507

Dear Mr. Enwiya:

Re: Monthly Progress Report No. 43
Remedial Design/Remedial Action UAO
Former Rockwell International Corporation Site
Allegan, Michigan

On behalf of ArvinMeritor, Inc. (ArvinMeritor), and in accordance with Section XI, Paragraph 67 of the Unilateral Administrative Order (UAO) for the Former Rockwell International Site (Site) effective October 30, 2002, Conestoga-Rovers & Associates (CRA) has prepared the following progress report for the period of May 1, 2006 through May 31, 2006. Pursuant to Section XI, Paragraph 67 of the Administrative Order, this report is due at the United States Environmental Protection Agency (U.S. EPA) on June 12, 2006.

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

During this reporting period, the following activities were undertaken:

- On May 9 and 22, 2006 sewer cleaning and video inspections were conducted;
- On May 10, 2006, Monthly Progress Report No. 42 was submitted to the U.S. EPA covering the period of April 1, through April 30, 2006;
- On May 18, 2006, CRA attended a meeting with the Allegan Neighborhood Watch Group/EPA Public Meeting to provide local residents with an update of activities related to the Remedial Action;
- On May 19, 2006, CRA inspected the underground vault formerly associated with the former Waste Water Treatment Building;
- Excavation of contaminated soil and LNAPL impacted areas continued throughout the reporting period;
- Soil chemical and LNAPL verification samples were collected from completed Excavation Areas 5, 7, and 8 throughout the reporting period; and
- Treatment of wastewater through the on-Site wastewater treatment system continued throughout the reporting period.



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

On May 9, 2006 sewer cleaning activities were conducted consistent with the methods detailed in the letter submitted April 18, 2006 to the U.S. EPA. On May 9, 2006, the following sewer lines were cleaned by Taplin Environmental (Taplin) and videotaped by Downunder Municipal Services (Downunder):

- East from MH11;
- MH11 North;
- MH13 to MH11;
- East from MH13;
- MH8 to MH7;
- MH7 to MH35;
- MH6 to MH7; and
- North to MH35.

As further cleaning and videotaping was required, both Taplin and Downunder returned to the Site on May 22, 2006 to conduct further activities with respect to the following lines:

- East from MH11;
- MH11 North;
- MH27 to MH8;
- MH8 South; and
- MH35 North.

It should be noted that one sewer line (South from MH13) has not been videotaped to date. Once this sewer line has been videotaped CRA will document all sewer cleaning activities and findings in a memo to be submitted to the U.S. EPA. The memo will include a copy of the sewer cleaning video.

On May 19, 2006, CRA conducted an inspection of the underground vault formerly associated with the former Waste Water Treatment Building. During the inspection approximately 4 to 6 inches of water was observed. No cracks or leakage were noted. A hole at ground surface was noted. PCBs detected in the water sample (KK-038) collected on March 29, 2006 from the vault is likely due to soil from ground surface above entering the vault through the hole at ground surface. CRA proposes to clean the vault prior to demolition. CRA will document the findings of the inspection in a memo to be submitted to the U.S. EPA.



In May 2006, the following samples were collected as part of the RA by CRA:

<i>Sample ID</i>	<i>Sample Location</i>	<i>Laboratory Analysis</i>
S-13151-050806-KK-271	Stained Material Excavation Area No. 7	PCBs, SVOCs, metals
O-13151-050906-KK-035	Excavation Area No.5 Oil in Piping	PCBs

All samples were submitted under chain-of-custody protocol to Severn Trent Laboratories Inc. (STL) for laboratory analyses.

On May 8, 2006, while excavating within Area No. 7, stained soil differing from the material that had previously been investigated as part of the Pre-Design Investigation Activities was encountered at a depth of approximately 4 feet below ground surface (bgs). A sample of the stained material was collected and submitted for total polychlorinated biphenyls (PCB), semi-volatile organic compounds (SVOC), and metals analyses. The laboratory results generated are summarized in Table 1. The soil sample indicated that with the exception of arsenic, the analyzed parameters were either not detected above the laboratory detection limit or below the appropriate Soil Cleanup Criteria for >2 feet bgs. The material was removed as part of the excavation activities conducted within the 0 to 2 feet bgs portion of Excavation No. 7.

On May 9, 2006 while excavating within Excavation Area No. 5, piping was encountered. Oil was observed within the piping. A sample (KK-035) of the oil was collected and submitted for PCB analysis. The laboratory results generated are summarized in Table 2. The LNAPL sample indicated that Aroclor 1254 and Aroclor 1260 were detected at concentration of 6,800 µg/kg and 1,800 µg/kg, respectively. The PCB concentrations are below the criteria for disposal at a TSCA regulated facility of 50,000 µg/kg. The oil will be removed from the piping and drummed pending appropriate off-Site disposal. The piping will be removed, decontaminated and sent off-Site for recycling.

During May 2006, 81 soil chemical verification samples were collected from Excavation Areas Nos. 5 (0 to 2 feet), 5 (2 to 10 feet), 7 (0 to 2 feet), and 8 (>10 feet). All samples were submitted under chain-of-custody protocol to STL for laboratory analyses. A summary of the preliminary unvalidated soil chemical verification sample analytical results is provided in Tables 3 and 4. All soil chemical verification samples collected from Area Nos. 5 (0 to 2 feet) and 7 (0 to 2 feet) were analyzed for metals. Soil chemical verification samples collected from Area No 5 (2 to 10 feet) were analyzed for metals and polychlorinated dibenzo-p-dioxins/polychlorinated dibenzofurans (PCDD/PCDF). Soil



chemical verification samples collected from Area No. 8 (>10 feet) were submitted for PCBs. The following is a summary of the analytical results generated for each area.

Excavation Area No. 5 (0 to 2 feet)

As discussed in Progress Report No. 42, exceedances of the applicable Soil Cleanup Criteria for 0 to 2 feet bgs were noted. Further excavation and verification sampling were conducted on May 4, 2006. Nine samples (KK-246 to KK-254) were collected and submitted for metals analysis. Exceedances of the Soil Cleanup Criteria were again noted in samples KK-246 and KK-250. With respect to sample KK-246, on May 10, 2006, further excavation was conducted in the vicinity of sample KK-246. Three samples (KK-290 to KK-292) were collected and submitted for metals analysis. No further exceedances of the Soil Cleanup Criteria were noted from the additional sampling. With respect to sample KK-250, as this sample was collected from the excavation that overlapped with an LNAPL portion of Area No. 5. Also, the lead exceedance detected in sample KK-250 was likely attributable to metal shavings encountered within the vicinity of sample KK-250. As metals shavings were encountered and the area overlapped with the LNAPL area to be excavated, further excavation in the vicinity of KK-250 will be incorporated with the LNAPL excavation to be completed.

Excavation Area No. 5 (2 to 10 feet)

Between May 9, 2006 and May 16, 2006, 18 soil verification samples were collected and submitted for metals and PCDD/PCDF analyses from the 2 to 10 feet bgs portion of Area No. 5. At the time of this report, analytical results for only samples KK-272 to KK-282 were received. Metal and PCDD/PCDF exceedances of the Soil Cleanup Criteria were noted in samples KK-272, KK-276, KK-277, KK-278, and KK-279. As samples KK-272, KK-277, KK-278, and KK-279 were collected from the floor of the excavation that overlaps the underlying LNAPL portion of Area No. 5 further excavation and sampling related to these samples will be included as part of the LNAPL excavation. As sample KK-272 was collected from the wall of the excavation, on May 26, 2006, further excavation in the vicinity of sample KK-272 was conducted. Four samples (KK-312 to KK-315) were collected and submitted for PCDD/PCDF analysis. At the time of this report the analytical results for samples KK-312 to KK-315 had not been received.

Excavation Area No. 7 (0 to 2 feet)

As discussed in Progress Report No. 42, exceedances of the applicable Soil Cleanup Criteria for 0 to 2 feet bgs were noted. Further excavation and verification sampling were conducted on May 5, 2006. Eight samples (KK-263 to KK-270) were collected and submitted for metals analyses. Exceedances of the Soil Cleanup Criteria were again noted in samples KK-263 and KK-264. On May 16, 2006, further excavation was



conducted in the vicinity of samples KK-263 and KK-264. Six samples (KK-293 to KK-298) were collected and submitted for metals analyses. No further exceedances of the Soil Cleanup Criteria were noted therefore the 0 to 2 feet excavation of Area No. 5 was deemed complete.

Excavation Area No. 8 (>10 feet)

On May 18, 2006, 13 soil chemical verification samples (KK-299 to KK-311) were collected and submitted for PCBs analyses from the >10 feet bgs portion of Area No. 8. No exceedances of the applicable Soil Cleanup Criteria for >2 feet bgs were noted, therefore, the >2 feet bgs portion of Area No. 8 was deemed complete.

In addition to the soil chemical verification samples collected, 15 LNAPL soil verification samples were collected from Excavation Area Nos. 5 and 8. A summary of LNAPL soil verification samples is provided in Table 5 along with an indication of whether or not the sample passed or failed the LNAPL soil test. As shown in Table 5, no samples failed to meet the LNAPL soil test requirements.

In May 2006, nine wastewater samples were collected from the on-Site water treatment system to determine compliance with the City of Allegan wastewater discharge permit requirements. All wastewater samples were submitted under chain-of-custody protocol to KAR Laboratories Inc. A summary of wastewater samples is provided in Table 6 along with an indication of whether or not the sample passed or failed the discharge permit requirements. As shown in Table 6, no samples failed to meet the discharge permit requirements.

3. Actions Planned for the Next 90-Days

The following activities are anticipated for the next 90 days:

- Continued discussion with WM regarding approval for disposal of soils from the remaining excavation areas to be completed in 2006;
- Conduct sewer video inspection of sewer line south from MH13;
- Excavation of contaminated soil and LNAPL impacted areas; and
- Begin Site balancing and final grading activities.

4. Difficulties Encountered

CRA Services has contracted with Waste Management to provide transportation and disposal of non-hazardous, non-TSCA materials from the Site to the Autumn Hills



Landfill in Zeeland, Michigan. Waste Management has contracted with Contractor's Trucking Inc. (Cordes) to provide the transportation of non-hazardous, non-TSCA materials. CRA Services directly contacts Cordes to schedule trucking needs.

On May 1, 2006, approximately 1 to 2 cubic yards of non-hazardous, non-TSCA soil was released from a Cordes truck onto the pavement of County Road A-37 located in Allegan County, Michigan approximately nine miles north of the Site.

5. Actions Taken to Resolve Difficulties Encountered

Following the incident, the driver immediately notified his office, as well as CRA, and cleanup was initiated under the direction of Cordes. The soil on the pavement was initially cleaned up by an Allegan County employee using a sweeper/power broom. Some of the soil was pushed into the east right-of-way/shoulder of the road (A-37).

Following the cleanup, CRA Services' Site Health and Safety Officer Tim Reed was at the location of the incident to inspect the cleanup. CRA Services was not satisfied with the clean up efforts. Waste Management, along with Cordes, was notified that the cleanup was insufficient. Cordes then mobilized additional equipment (backhoe, bobcat and a sweeper) to the incident location to conduct additional clean up efforts. CRA Field Engineer Kevin Kowalk and Weston representative Keith Kidder were at the incident location to observe the final cleanup and restoration activities.

Approximately 2 to 4 inches of topsoil and grass were removed along with the potentially impacted soils. The area was graded using topsoil. The material removed from the shoulder was sent for disposal to the Autumn Hills Landfill. All cleanup and restoration activities were completed by 6:00 p.m. on May 1, 2006.

Investigation into the incident determined that the truck driver did not have the turn buckles secure before leaving the Site. The driver has been banned from transporting material from the Site. Security at the Site will inspect trucks leaving the Site to ensure turnbuckles are secure.

A memo documenting the incident and the subsequent clean-up was submitted to the U.S. EPA on May 19, 2006.

6. On-Going Considerations Related to the Administrative Order

Although access was granted by the City of Allegan to implement the RA, restrictive covenant agreements with the City continue to remain unresolved. Conference calls



**CONESTOGA-ROVERS
& ASSOCIATES**

June 12, 2006

7

Reference No. 13151-10

with counsel for the City of Allegan and U.S. EPA Assistant Regional Counsel, Kathleen Schnieders, resulted in the conclusion that the restrictive covenant requirement would be deferred at this time.

We trust this progress report provides you with the information required to assess the status of this project. Should you have any questions on the above, please do not hesitate to contact us.

Yours truly,

CONESTOGA-ROVERS & ASSOCIATES

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

Gregory A. Carli, P. E.

JP/jp/18

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

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

<i>Sample ID</i>	<i>Collection Date (mm/dd/yy)</i>	<i>Sample Location</i>	<i>Discharge Permit Requirements</i>	
			<i>Pass</i>	<i>Fail</i>
W-37326-050106-KK-039	05/01/06	Tank #255609	X	
W-37326-050906-KK-040	05/09/06	Tank #259944	X	
W-37326-051006-KK-041	05/10/06	Tank #255609	X	
W-37326-051706-KK-042	05/17/06	Tank #255609	X	
W-37326-051806-KK-043	05/18/06	Tank #259944	X	
W-37326-052206-KK-045	05/22/06	Tank #255609	X	
W-37326-052406-KK-046	05/24/06	Tank #259944	X	
W-37326-052406-KK-047	05/24/06	Tank #255609	X	
W-37326-052606-KK-048	05/26/06	Tank #259944	X	

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

Sample ID: O-13151-050906-KK-035
Date Sampled: 5/9/2006
Sample Location: Excavation Area No.5
Piping Oil

<i>Parameter</i>	<i>Units</i>	<i>TSCA Criteria</i>	
PCBs			
PCBs (total)	ug/kg	50000	ND(10000)
Aroclor 1016	ug/kg	50000	ND(10000)
Aroclor 1221	ug/kg	50000	ND(10000)
Aroclor 1232	ug/kg	50000	ND(10000)
Aroclor 1242	ug/kg	50000	ND(10000)
Aroclor 1248	ug/kg	50000	6800 J
Aroclor 1254	ug/kg	50000	ND(10000)
Aroclor 1260	ug/kg	50000	1800 J

Notes:

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

TSCA - Maximum concentration of PCBs as defined in the U.S. EPA's Toxic Substance Control Act Part 261 Regulation (using the Toxicity Characteristic Leaching Procedure)

PCBs - Polychlorinated Biphenyls

-- Parameter not analyzed

TABLE 3

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

Sample ID:	S-13151-050406-KK-246	S-13151-050406-KK-247	S-13151-050406-KK-248	S-13151-050406-KK-249	S-13151-050406-KK-250
Date Sampled:	5/4/06	5/4/06	5/4/06	5/4/06	5/4/06
Sample Location:	Excavation Area 5-Wall 7	Excavation Area 5-Floor 8	Excavation Area 5-Wall 8	Excavation Area 5-Floor 9	Excavation Area 5-Floor 10
Sample Depth (feet bgs)	0-2	4	0-2	4	4

Selected Parameters

	Soil Cleanup Criteria							
	0 - 2 feet bgs ⁽¹⁾	> 2 feet bgs ⁽²⁾						
Metals								
Silver	mg/kg	2,500	17,000	0.45	ND (0.086)	ND (0.088)	1.2	8.1
Aluminum	mg/kg	50,000	660,000	11700	2200	3500	4640	11200
Arsenic	mg/kg	9.4	61	14.6	2.1	2.9	10.9	35.1
Barium	mg/kg	37,000	250,000	63.2	19.5	164	495	907
Beryllium	mg/kg	410	3,100	0.63	0.16 B	0.25	0.5	0.66
Cadmium	mg/kg	550	4,100	0.82	0.039 B	0.051	0.81	1.3
Cobalt	mg/kg	2,600	18,000	19.5	3.1	4.2	31.4	22.5
Chromium	mg/kg		127 J		5.3 J	10.5 J	104 J	230 J
Copper	mg/kg	20,000	140,000	793	13.3	18.7	149	25900
Iron	mg/kg	160,000	1,000,000	85100 J	8860 J	11600 J	55500 J	138000 J
Mercury	mg/kg	160	1,100	0.030 B	0.014 B	0.021 B	0.084	0.09
Manganese	mg/kg	25,000	170,000	1900 J	336 J	295 J	2830 J	28800 J
Nickel	mg/kg	40,000	270,000	102	8.1	15.4	103	349
Lead	mg/kg	400	900	143	7.8	31.1	46.2	4740
Antimony	mg/kg	180	670	0.41	0.029 B	0.052 B	0.37	71.6
Selenium	mg/kg	2,600	18,000	ND (0.21)	0.096 B	ND (0.18)	0.35	0.29
Thallium	mg/kg	35	240	0.12	0.027 B	0.050 B	0.066 B	0.17 B,G
Vanadium	mg/kg	750	10,000	43.6	8.2	10	28.5	46.2
Zinc	mg/kg	170,000	1,000,000	98.5 J	23.8 J	24.6 J	212 J	114 J
Polychlorinated Biphenyls								
Aroclor-1016	ug/kg	1,000	10,000	-	-	-	-	-
Aroclor-1221	ug/kg	1,000	10,000	-	-	-	-	-
Aroclor-1232	ug/kg	1,000	10,000	-	-	-	-	-
Aroclor-1242	ug/kg	1,000	10,000	-	-	-	-	-
Aroclor-1248	ug/kg	1,000	10,000	-	-	-	-	-
Aroclor-1254	ug/kg	1,000	10,000	-	-	-	-	-
Aroclor-1260	ug/kg	1,000	10,000	-	-	-	-	-

TABLE 3

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

<i>Sample ID:</i>	S-13151-050406-KK-251	S-13151-050406-KK-252	S-13151-050406-KK-253	S-13151-050406-KK-254	S-13151-050506-KK-263
<i>Date Sampled:</i>	5/4/06	5/4/06	5/4/06	5/4/06	5/5/06
<i>Sample Location:</i>	Excavation Area 5-Wall 9	Excavation Area 5-Floor 11	Excavation Area 5-Wall 10	Excavation Area 5-Floor 12	Excavation Area 7-Wall 7
<i>Sample Depth (feet bgs)</i>	0-2	4	0-2	4	0-2

Selected Parameters

	Soil Cleanup Criteria							
	<u>0 - 2 feet bgs ⁽¹⁾</u>	<u>> 2 feet bgs ⁽²⁾</u>						
<i>Metals</i>								
Silver	mg/kg	2,500	17,000	0.17	ND (0.086)	0.052 B	0.13	0.17
Aluminum	mg/kg	50,000	660,000	1680	3280	4450	1390	2820
Arsenic	mg/kg	9.4	61	4	3.2	4.4	5.7	12.2
Barium	mg/kg	37,000	250,000	194	22	79.2	307	67.1
Beryllium	mg/kg	410	3,100	0.14 B	0.22	0.27	0.11 B	0.087 B
Cadmium	mg/kg	550	4,100	1.2	0.068	0.06	0.26	0.44
Cobalt	mg/kg	2,600	18,000	4.4	3	5.5	3.3	17.1
Chromium	mg/kg			19.6 J	6.2 J	54.6 J	12.8 J	150
Copper	mg/kg	20,000	140,000	65	12	34.8	25.1	125
Iron	mg/kg	160,000	1,000,000	40400 J	7970 J	24000 J	14100 J	176000 J
Mercury	mg/kg	160	1,100	0.034 B	0.014 B	0.05	0.020 B	0.15
Manganese	mg/kg	25,000	170,000	438 J	229 J	498 J	352 J	2390 J
Nickel	mg/kg	40,000	270,000	36.7	6.2	54.9	20.8	97.2
Lead	mg/kg	400	900	37.5	5.4	8.1	21.2	53.2
Antimony	mg/kg	180	670	0.42	0.018 B	0.22	0.54	0.10 B
Selenium	mg/kg	2,600	18,000	ND (0.18)	0.088 B	0.10 B	ND (0.17)	0.16 B
Thallium	mg/kg	35	240	0.022 B	0.045 B	0.032	0.028 B	0.030 B
Vanadium	mg/kg	750	10,000	7.2	8.9	11.5	7.5	15.4
Zinc	mg/kg	170,000	1,000,000	88.9 J	26.8 J	21.6 J	50.3 J	87.8 J
<i>Polychlorinated Biphenyls</i>								
Aroclor-1016	ug/kg	1,000	10,000	-	-	-	-	-
Aroclor-1221	ug/kg	1,000	10,000	-	-	-	-	-
Aroclor-1232	ug/kg	1,000	10,000	-	-	-	-	-
Aroclor-1242	ug/kg	1,000	10,000	-	-	-	-	-
Aroclor-1248	ug/kg	1,000	10,000	-	-	-	-	-
Aroclor-1254	ug/kg	1,000	10,000	-	-	-	-	-
Aroclor-1260	ug/kg	1,000	10,000	-	-	-	-	-

TABLE 3

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

<i>Sample ID:</i>	S-13151-050506-KK-264	S-13151-050506-KK-265	S-13151-050506-KK-266	S-13151-050506-KK-267
<i>Date Sampled:</i>	5/5/06	5/5/06	5/5/06	5/5/06
<i>Sample Location:</i>	Excavation Area 7-Wall 8	Excavation Area 7-Floor 53	Excavation Area 7-Floor 53	Excavation Area 7-Floor 54
<i>Sample Depth (feet bgs)</i>	0-2	4	4	4

Selected Parameters

	Soil Cleanup Criteria						
	<i>0 - 2 feet bgs ⁽¹⁾</i>	<i>> 2 feet bgs ⁽²⁾</i>					
<i>Metals</i>							
Silver	mg/kg	2,500	17,000	0.15	0.32	0.21	0.28
Aluminum	mg/kg	50,000	660,000	5020	2650	2150	3120
Arsenic	mg/kg	9.4	61	11.1	10.7	10.6	18.7
Barium	mg/kg	37,000	250,000	24.1	27.7	30.2	12.7
Beryllium	mg/kg	410	3,100	0.17 B	ND (0.19)	ND (0.19)	0.11 B
Cadmium	mg/kg	550	4,100	0.63	0.2	0.16	0.75
Cobalt	mg/kg	2,600	18,000	26.5	20.2	18.3	25.2
Chromium	mg/kg			216	450	552	248
Copper	mg/kg	20,000	140,000	183	176	176	232
Iron	mg/kg	160,000	1,000,000	292000 J	196000 J	205000 J	414000 J
Mercury	mg/kg	160	1,100	0.042 B	0.029 B	0.032 B	ND (0.05)
Manganese	mg/kg	25,000	170,000	4350 J	2750 J	2570 J	6010 J
Nickel	mg/kg	40,000	270,000	199	132	138	211
Lead	mg/kg	400	900	31.8	66.2	51.5	49.3
Antimony	mg/kg	180	670	0.19 B	1.1	0.55	1.5
Selenium	mg/kg	2,600	18,000	ND (0.20)	0.12 B	ND (0.19)	0.16 B
Thallium	mg/kg	35	240	0.057 B	0.027 B	0.021 B	0.034 B
Vanadium	mg/kg	750	10,000	21.6	17.2	11.8	12.7
Zinc	mg/kg	170,000	1,000,000	113 J	57.8 J	47.5 J	70.4 J
<i>Polychlorinated Biphenyls</i>							
Aroclor-1016	ug/kg	1,000	10,000	-	-	-	-
Aroclor-1221	ug/kg	1,000	10,000	-	-	-	-
Aroclor-1232	ug/kg	1,000	10,000	-	-	-	-
Aroclor-1242	ug/kg	1,000	10,000	-	-	-	-
Aroclor-1248	ug/kg	1,000	10,000	-	-	-	-
Aroclor-1254	ug/kg	1,000	10,000	-	-	-	-
Aroclor-1260	ug/kg	1,000	10,000	-	-	-	-

TABLE 3

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

<i>Sample ID:</i>	S-13151-050506-KK-268	S-13151-050506-KK-269	S-13151-050506-KK-270	S-13151-050806-KK-271
<i>Date Sampled:</i>	5/5/06	5/5/06	5/5/06	5/8/06
<i>Sample Location:</i>	Excavation Area 7-Floor 55	Excavation Area 7-Floor 56	Excavation Area 7-Floor 57	Excavation Area 7-Floor 58
<i>Sample Depth (feet bgs)</i>	4	4	4	4

Selected Parameters

	Soil Cleanup Criteria						
	<u>0 - 2 feet bgs ⁽¹⁾</u>	<u>> 2 feet bgs ⁽²⁾</u>					
Metals							
Silver	mg/kg	2,500	17,000	0.079 B	0.12	0.69	0.34
Aluminum	mg/kg	50,000	660,000	4510	4010	2820	2390
Arsenic	mg/kg	9.4	61	4.3	6.8	11.6	12.5
Barium	mg/kg	37,000	250,000	116	367	253	45.3
Beryllium	mg/kg	410	3,100	0.24	0.068 B	0.13 B	ND (0.96) G
Cadmium	mg/kg	550	4,100	0.35	0.38	0.61	0.67
Cobalt	mg/kg	2,600	18,000	4.9	17.1	45.4	31.9
Chromium	mg/kg			22.3	189	876	442
Copper	mg/kg	20,000	140,000	28.7	141	414	287
Iron	mg/kg	160,000	1,000,000	24900 J	103000 J	335000 J	320000 J
Mercury	mg/kg	160	1,100	0.11	0.073	0.037 B	0.11
Manganese	mg/kg	25,000	170,000	674 J	1320 J	4050 J	4260 J
Nickel	mg/kg	40,000	270,000	19	139	582	298
Lead	mg/kg	400	900	112	66.7	90.3	155
Antimony	mg/kg	180	670	0.018 B	0.53	0.85	2
Selenium	mg/kg	2,600	18,000	0.29	ND (0.18)	ND (0.21)	ND (0.19)
Thallium	mg/kg	35	240	0.037 B	0.051 B	0.025 B	0.019 B
Vanadium	mg/kg	750	10,000	11.9	38.4	26	29.6
Zinc	mg/kg	170,000	1,000,000	77.1 J	96.1 J	84.8 J	50.3
Polychlorinated Biphenyls							
Aroclor-1016	ug/kg	1,000	10,000	-	-	-	-
Aroclor-1221	ug/kg	1,000	10,000	-	-	-	-
Aroclor-1232	ug/kg	1,000	10,000	-	-	-	-
Aroclor-1242	ug/kg	1,000	10,000	-	-	-	-
Aroclor-1248	ug/kg	1,000	10,000	-	-	-	-
Aroclor-1254	ug/kg	1,000	10,000	-	-	-	-
Aroclor-1260	ug/kg	1,000	10,000	-	-	-	-

TABLE 3

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

Sample ID:	S-13151-050906-KK-272	S-13151-050906-KK-273	S-13151-050906-KK-274	S-13151-050906-KK-275
Date Sampled:	5/9/06	5/9/06	5/9/06	5/9/06
Sample Location:	Excavation Area 5 (2-10 ft) Floor 1	Excavation Area 5 (2-10 ft) Floor 2	Excavation Area 5 (2-10 ft) Wall 2	Excavation Area 5 (2-10 ft) ft) Wall 1
Sample Depth (feet bgs)	10	10	5-7	5-7

Selected Parameters

	Soil Cleanup Criteria							
	<u>0 - 2 feet bgs ⁽¹⁾</u>	<u>> 2 feet bgs ⁽²⁾</u>						
Metals								
Silver	mg/kg	2,500	17,000	0.97 J	0.65 J	0.074 B _J	0.27 J	
Aluminum	mg/kg	50,000	660,000	12000	4110	2350	2690	
Arsenic	mg/kg	9.4	61	6.5	4	8.4	2.6	
Barium	mg/kg	37,000	250,000	54.1	85.2	65.8	44	
Beryllium	mg/kg	410	3,100	0.25	ND (0.2)	0.13 B	ND (0.17)	
Cadmium	mg/kg	550	4,100	0.75	0.48	0.14	0.25	
Cobalt	mg/kg	2,600	18,000	28.6	13	9.2	4.6	
Chromium	mg/kg			207	74.4	72.3	23.9	
Copper	mg/kg	20,000	140,000	312	133	303	7150	
Iron	mg/kg	160,000	1,000,000	212000 J	47900 J	101000 J	26300 J	
Mercury	mg/kg	160	1,100	0.084	0.3	0.027 B	0.044	
Manganese	mg/kg	25,000	170,000	3070 J	717 J	1340 J	512 J	
Nickel	mg/kg	40,000	270,000	148	73.2	98.4	66.5	
Lead	mg/kg	400	900	233	141	161	576	
Antimony	mg/kg	180	670	5.8	0.25	0.54	0.18	
Selenium	mg/kg	2,600	18,000	ND (0.21)	ND (0.2)	0.12 B	0.17	
Thallium	mg/kg	35	240	0.082 B	0.055 B	0.018 B	0.015 B	
Vanadium	mg/kg	750	10,000	54.2	20.1	14.3	10.6	
Zinc	mg/kg	170,000	1,000,000	90.0 J	89.3 J	21.0 J	56.6 J	
Polychlorinated Biphenyls								
Aroclor-1016	ug/kg	1,000	10,000	-	-	-	-	
Aroclor-1221	ug/kg	1,000	10,000	-	-	-	-	
Aroclor-1232	ug/kg	1,000	10,000	-	-	-	-	
Aroclor-1242	ug/kg	1,000	10,000	-	-	-	-	
Aroclor-1248	ug/kg	1,000	10,000	-	-	-	-	
Aroclor-1254	ug/kg	1,000	10,000	-	-	-	-	
Aroclor-1260	ug/kg	1,000	10,000	-	-	-	-	

TABLE 3

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

<i>Sample ID:</i>	S-13151-051006-KK-276	S-13151-051006-KK-277	S-13151-051006-KK-278	S-13151-051006-KK-279
<i>Date Sampled:</i>	5/10/06	5/10/06	5/10/06	5/10/06
<i>Sample Location:</i>	Excavation Area 5 (2-10 ft) Wall 3	Excavation Area 5 (2-10 ft) Floor 3	Excavation Area 5 (2-10 ft) Floor 3	Excavation Area 5 (2-10 ft) Floor 4
<i>Sample Depth (feet bgs)</i>	5-7	10	10	10

Selected Parameters

	Soil Cleanup Criteria							
	<i>0 - 2 feet bgs</i> ⁽¹⁾	<i>> 2 feet bgs</i> ⁽²⁾						
<i>Metals</i>								
Silver	mg/kg	2,500	17,000	0.81 J	0.47 J	2.9 J	1.2 J	
Aluminum	mg/kg	50,000	660,000	12300	17500	17900	12700	
Arsenic	mg/kg	9.4	61	16.5	5	7.6	15.7	
Barium	mg/kg	37,000	250,000	57.8	67.3	50.6	62.7	
Beryllium	mg/kg	410	3,100	0.29	0.54	0.57	0.29	
Cadmium	mg/kg	550	4,100	1.1	0.99	1.1	1.6	
Cobalt	mg/kg	2,600	18,000	41.6	32.7	29.2	27.6	
Chromium	mg/kg			254	120	132	169	
Copper	mg/kg	20,000	140,000	365	3340	226	357	
Iron	mg/kg	160,000	1,000,000	285000 J	90400 J	118000 J	171000 J	
Mercury	mg/kg	160	1,100	0.038 B	0.072	0.14	0.15	
Manganese	mg/kg	25,000	170,000	9540 J	1520 J	1710 J	3230 J	
Nickel	mg/kg	40,000	270,000	270	414	126	143	
Lead	mg/kg	400	900	337	5000	78.6	147	
Antimony	mg/kg	180	670	1.9	0.21 B	0.34	0.85	
Selenium	mg/kg	2,600	18,000	ND (0.22)	ND (0.26)	ND (0.24)	ND (0.2)	
Thallium	mg/kg	35	240	0.071 B	0.11 B	0.12	0.078 B	
Vanadium	mg/kg	750	10,000	49.6	47.4	50.2	41.6	
Zinc	mg/kg	170,000	1,000,000	96.2 J	110 J	90.4 J	97.0 J	
<i>Polychlorinated Biphenyls</i>								
Aroclor-1016	ug/kg	1,000	10,000	-	-	-	-	
Aroclor-1221	ug/kg	1,000	10,000	-	-	-	-	
Aroclor-1232	ug/kg	1,000	10,000	-	-	-	-	
Aroclor-1242	ug/kg	1,000	10,000	-	-	-	-	
Aroclor-1248	ug/kg	1,000	10,000	-	-	-	-	
Aroclor-1254	ug/kg	1,000	10,000	-	-	-	-	
Aroclor-1260	ug/kg	1,000	10,000	-	-	-	-	

TABLE 3

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

<i>Sample ID:</i>	S-13151-051006-KK-280	S-13151-051006-KK-281	S-13151-051006-KK-282	S-13151-051606-KK-283
<i>Date Sampled:</i>	5/10/06	5/10/06	5/10/06	5/16/06
<i>Sample Location:</i>	Excavation Area 5 (2-10 ft)	Excavation Area 5 (2-10 ft)	Excavation Area 5 (2-10 ft)	Excavation Area 5 (2-10 ft)
<i>Sample Depth (feet bgs)</i>	Floor 5 10	Wall 4 5-7	Wall 5 5-7	Floor 6 10

Selected Parameters

	Soil Cleanup Criteria							
	<u>0 - 2 feet bgs ⁽¹⁾</u>	<u>> 2 feet bgs ⁽²⁾</u>						
<i>Metals</i>								
Silver	mg/kg	2,500	17,000	1.0 J	0.22 J	0.90 J		3.3
Aluminum	mg/kg	50,000	660,000	13800	8530	13400		7890
Arsenic	mg/kg	9.4	61	12.8	9.8	7.4		11.4
Barium	mg/kg	37,000	250,000	133	73.1	184		63.3
Beryllium	mg/kg	410	3,100	ND (0.25)	0.38	ND (0.2)		0.4
Cadmium	mg/kg	550	4,100	1.6	0.55	1.2		1.4
Cobalt	mg/kg	2,600	18,000	55.7	19.3	18		45.6
Chromium	mg/kg			258	95.8	134		227
Copper	mg/kg	20,000	140,000	514	2040	182		454
Iron	mg/kg	160,000	1,000,000	194000 J	111000 J	121000 J		168000 J
Mercury	mg/kg	160	1,100	0.030 B	0.094	0.18		0.06 B,J
Manganese	mg/kg	25,000	170,000	5790 J	2430 J	12500 J		3340 J
Nickel	mg/kg	40,000	270,000	228	114	79.1		201
Lead	mg/kg	400	900	136	229	187		75.6
Antimony	mg/kg	180	670	0.81	1	0.85		0.3
Selenium	mg/kg	2,600	18,000	ND (0.25)	ND (0.22)	ND (0.2)		ND (0.24)
Thallium	mg/kg	35	240	0.14	0.072 B	0.072 B		0.081 B
Vanadium	mg/kg	750	10,000	89.4	27.3	43.4		58.4
Zinc	mg/kg	170,000	1,000,000	112 J	61.7 J	143 J		193 J
<i>Polychlorinated Biphenyls</i>								
Aroclor-1016	ug/kg	1,000	10,000	-	-	-		-
Aroclor-1221	ug/kg	1,000	10,000	-	-	-		-
Aroclor-1232	ug/kg	1,000	10,000	-	-	-		-
Aroclor-1242	ug/kg	1,000	10,000	-	-	-		-
Aroclor-1248	ug/kg	1,000	10,000	-	-	-		-
Aroclor-1254	ug/kg	1,000	10,000	-	-	-		-
Aroclor-1260	ug/kg	1,000	10,000	-	-	-		-

TABLE 3

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

<i>Sample ID:</i>	S-13151-051606-KK-284	S-13151-051606-KK-285	S-13151-051606-KK-286	S-13151-051606-KK-287
<i>Date Sampled:</i>	5/16/06	5/16/06	5/16/06	5/16/06
<i>Sample Location:</i>	Excavation Area 5 (2-10 ft)	Excavation Area 5 (2-10 ft)	Excavation Area 5 (2-10 ft)	Excavation Area 5 (2-10 ft)
<i>Sample Depth (feet bgs)</i>	Floor 6 10	Wall 6 5-7	Floor 7 10	Wall 7 5-7

Selected Parameters

	Soil Cleanup Criteria							
	<i>0 - 2 feet bgs</i> ⁽¹⁾	<i>> 2 feet bgs</i> ⁽²⁾						
<i>Metals</i>								
Silver	mg/kg	2,500	17,000	0.82	0.35	4.6	1.2	
Aluminum	mg/kg	50,000	660,000	6780	12700	13500	9530	
Arsenic	mg/kg	9.4	61	11.1	5.9	21	17.4	
Barium	mg/kg	37,000	250,000	54.1	71.9	80.2	359	
Beryllium	mg/kg	410	3,100	0.36	0.62	0.68	0.8	
Cadmium	mg/kg	550	4,100	2.1	1.1	1.8	1.6	
Cobalt	mg/kg	2,600	18,000	45.6	14.1	14.9	33.9	
Chromium	mg/kg			181	117	150	3.8	
Copper	mg/kg	20,000	140,000	467	157	152	365	
Iron	mg/kg	160,000	1,000,000	142000 J	114000 J	119000 J	151000 J	
Mercury	mg/kg	160	1,100	0.039 B,J	0.13 J	0.072 J	0.076 J	
Manganese	mg/kg	25,000	170,000	3410 J	1740 J	17300 J	22300 J	
Nickel	mg/kg	40,000	270,000	214	87.6	63.9	220	
Lead	mg/kg	400	900	324	70.4	115	118	
Antimony	mg/kg	180	670	0.56	0.22	0.82	1.7	
Selenium	mg/kg	2,600	18,000	ND (0.23)	ND (0.21)	ND (0.24)	ND (0.2)	
Thallium	mg/kg	35	240	0.075 B	0.074 B	0.054 B	0.068 B	
Vanadium	mg/kg	750	10,000	46.2	38.4	55.1	77	
Zinc	mg/kg	170,000	1,000,000	328 J	109 J	239 J	104 J	
<i>Polychlorinated Biphenyls</i>								
Aroclor-1016	ug/kg	1,000	10,000	-	-	-	-	
Aroclor-1221	ug/kg	1,000	10,000	-	-	-	-	
Aroclor-1232	ug/kg	1,000	10,000	-	-	-	-	
Aroclor-1242	ug/kg	1,000	10,000	-	-	-	-	
Aroclor-1248	ug/kg	1,000	10,000	-	-	-	-	
Aroclor-1254	ug/kg	1,000	10,000	-	-	-	-	
Aroclor-1260	ug/kg	1,000	10,000	-	-	-	-	

TABLE 3

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

<i>Sample ID:</i>	S-13151-051606-KK-288	S-13151-051606-KK-289	S-13151-051006-KK-290	S-13151-051006-KK-291
<i>Date Sampled:</i>	5/16/06	5/16/06	5/10/06	5/10/06
<i>Sample Location:</i>	Excavation Area 5 (2-10 ft)	Excavation Area 5 (2-10 ft)	Excavation Area 5 (0-2 ft)	Excavation Area 5 (0-2 ft)
<i>Sample Depth (feet bgs)</i>	Floor 8 10	Wall 8 5-7	Wall 11 0-2	Wall 12 0-2

Selected Parameters

	Soil Cleanup Criteria							
	<i>0 - 2 feet bgs</i> ⁽¹⁾	<i>> 2 feet bgs</i> ⁽²⁾						
<i>Metals</i>								
Silver	mg/kg	2,500	17,000	1	0.73	0.049 B	0.038 B	
Aluminum	mg/kg	50,000	660,000	14200	16200	2460	1290	
Arsenic	mg/kg	9.4	61	6	5.6	4.3	2.8	
Barium	mg/kg	37,000	250,000	66.5	47.6	40.8	40.5	
Beryllium	mg/kg	410	3,100	0.85	0.85	ND (0.17)	ND (0.17)	
Cadmium	mg/kg	550	4,100	4.3	0.64	0.061	0.064	
Cobalt	mg/kg	2,600	18,000	55.7	23.5	3.6	2.5	
Chromium	mg/kg			142	77.2	33.2	11.5	
Copper	mg/kg	20,000	140,000	565	296	62.7	24.3	
Iron	mg/kg	160,000	1,000,000	117000 J	69300 J	25100 J	13300 J	
Mercury	mg/kg	160	1,100	0.057 B,J	0.034 B,J	ND (0.042)	ND (0.042)	
Manganese	mg/kg	25,000	170,000	2660 J	3800 J	1670 J	366 J	
Nickel	mg/kg	40,000	270,000	160	38.7	32.2	17.6	
Lead	mg/kg	400	900	134	59.2	10.7	7.2	
Antimony	mg/kg	180	670	0.4	0.087 B	0.19	0.092 B	
Selenium	mg/kg	2,600	18,000	ND (0.27)	ND (0.26)	ND (0.17)	ND (0.17)	
Thallium	mg/kg	35	240	0.16	0.14	0.024 B	0.015 B	
Vanadium	mg/kg	750	10,000	56.4	40.3	7.3	5.3	
Zinc	mg/kg	170,000	1,000,000	120 J	83.9 J	15.2 J	17.6 J	
<i>Polychlorinated Biphenyls</i>								
Aroclor-1016	ug/kg	1,000	10,000	-	-	-	-	
Aroclor-1221	ug/kg	1,000	10,000	-	-	-	-	
Aroclor-1232	ug/kg	1,000	10,000	-	-	-	-	
Aroclor-1242	ug/kg	1,000	10,000	-	-	-	-	
Aroclor-1248	ug/kg	1,000	10,000	-	-	-	-	
Aroclor-1254	ug/kg	1,000	10,000	-	-	-	-	
Aroclor-1260	ug/kg	1,000	10,000	-	-	-	-	

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

<i>Sample ID:</i>	S-13151-051006-KK-292	S-13151-051606-KK-293	S-13151-051606-KK-294	S-13151-051606-KK-295	S-13151-051606-KK-296
<i>Date Sampled:</i>	5/10/06	5/16/06	5/16/06	5/16/06	5/16/06
<i>Sample Location:</i>	Excavation Area 5 (0-2 ft)	Excavation Area 7-Wall	Excavation Area 7-Wall 10	Excavation Area 7-Floor 59	Excavation Area 7-Wall 11
<i>Sample Depth (feet bgs)</i>	Floor 13 2-3	9 0-2	0-2	4	0-2

Selected Parameters

	Soil Cleanup Criteria							
	<u>0 - 2 feet bgs ⁽¹⁾</u>	<u>> 2 feet bgs ⁽²⁾</u>						
<i>Metals</i>								
Silver	mg/kg	2,500	17,000	0.82	0.088 B	0.13	0.11	ND (0.088)
Aluminum	mg/kg	50,000	660,000	6690	3210	3040	2330	3280
Arsenic	mg/kg	9.4	61	14.7	5.7	4.9	4.7	8.2
Barium	mg/kg	37,000	250,000	83.8	154	77.4	30.4	26.4
Beryllium	mg/kg	410	3,100	0.14 B	0.26	0.22	0.13 B	0.21
Cadmium	mg/kg	550	4,100	0.55	0.43	0.37	0.14	0.078
Cobalt	mg/kg	2,600	18,000	23.6	3.5	5.4	3.9	3.9
Chromium	mg/kg			194	13.9	32.2	23.4	5.8
Copper	mg/kg	20,000	140,000	924	25.7	39.7	22.7	11.9
Iron	mg/kg	160,000	1,000,000	231000 J	18100 J	45400 J	24400 J	14700 J
Mercury	mg/kg	160	1,100	0.021 B	0.18 J	0.20 J	0.061 J	0.056 J
Manganese	mg/kg	25,000	170,000	5470 J	328 J	865 J	429 J	380 J
Nickel	mg/kg	40,000	270,000	173	11.8	24.8	16.6	8.6
Lead	mg/kg	400	900	60.9	170	48.2	23.3	11.5
Antimony	mg/kg	180	670	3.6	0.073 B	0.14 B	0.08 B	ND (0.18)
Selenium	mg/kg	2,600	18,000	ND (0.19)	0.4	0.2	ND (0.18)	ND (0.18)
Thallium	mg/kg	35	240	0.062 B	0.036 B	0.038 B	0.024 B	0.054 B
Vanadium	mg/kg	750	10,000	36.4	9.6	8.6	6.5	9.2
Zinc	mg/kg	170,000	1,000,000	72.4 J	98.5 J	90.4 J	40.3 J	45.3 J
<i>Polychlorinated Biphenyls</i>								
Aroclor-1016	ug/kg	1,000	10,000	-	-	-	-	-
Aroclor-1221	ug/kg	1,000	10,000	-	-	-	-	-
Aroclor-1232	ug/kg	1,000	10,000	-	-	-	-	-
Aroclor-1242	ug/kg	1,000	10,000	-	-	-	-	-
Aroclor-1248	ug/kg	1,000	10,000	-	-	-	-	-
Aroclor-1254	ug/kg	1,000	10,000	-	-	-	-	-
Aroclor-1260	ug/kg	1,000	10,000	-	-	-	-	-

TABLE 4

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

Selected Parameters		Sample ID:	Date Sampled:					Sample Location:	Sample Depth (feet bgs)
			S-13151-050406-KK-255	S-13151-050406-KK-256	S-13151-050406-KK-257	S-13151-050406-KK-258	S-13151-050406-KK-259		
			5/4/06	5/4/06	5/4/06	5/4/06	5/4/06	5/4/06	
			Excavation Area 7-Wall 1	Excavation Area 7-Wall 2	Excavation Area 7-Wall 3	Excavation Area 7-Wall 3	Excavation Area 7-Wall 4		
			6	6	6	6	6		
			Soil Cleanup Criteria						
			0 - 2 feet bgs ⁽¹⁾	> 2 feet bgs ⁽²⁾					
Dioxin Furans									
2,3,7,8-Tetrachlorodibenzo-p-dioxin	pg/g	-	-	ND (0.22)	ND (0.12)	ND (0.15)	ND (0.16)	9.6	
Total Tetrachlorodibenzo-p-dioxin	pg/g	-	-	ND (0.22)	ND (0.12)	ND (0.15)	ND (0.16)	18	
1,2,3,7,8-Pentachlorodibenzofuran	pg/g	-	-	ND (0.24)	ND (0.16)	ND (0.15)	ND (0.2)	ND (1.3)	
Total Pentachlorodibenzofuran	pg/g	-	-	ND (0.57)	ND (0.16)	ND (0.2)	ND (0.25)	ND (3.7)	
1,2,3,4,7,8-Hexachlorodibenzo-p-dioxin	pg/g	-	-	ND (0.17)	ND (0.17)	ND (0.11)	ND (0.19)	ND (2.9)	
1,2,3,6,7,8-Hexachlorodibenzo-p-dioxin	pg/g	-	-	ND (0.13)	ND (0.13)	ND (0.098)	ND (0.32)	12	
1,2,3,7,8,9-Hexachlorodibenzo-p-dioxin	pg/g	-	-	ND (0.26)	ND (0.14)	ND (0.091)	ND (0.29)	8.7	
Total Hexachlorodibenzo-p-dioxin	pg/g	-	-	ND (0.78)	ND (0.4)	ND (0.36)	ND (0.75)	110	
1,2,3,4,6,7,8-Heptachlorodibenzo-p-dioxin	pg/g	-	-	ND (1.5)	ND (1.4)	ND (1.2)	ND (2.2)	490	
Total Heptachlorodibenzo-p-dioxin	pg/g	-	-	ND (1.9)	ND (1.9)	ND (1.4)	ND (2.4)	920	
1,2,3,4,6,7,8,9-Octachlorodibenzo-p-dioxin	pg/g	-	-	25	20	17	25	3800	
2,3,7,8-Tetrachlorodibenzofuran	pg/g	-	-	ND (0.075)	ND (0.054)	ND (0.057)	ND (0.13)	42 CON	
Total Tetrachlorodibenzofuran	pg/g	-	-	ND (0.075)	ND (0.054)	ND (0.057)	ND (0.13)	88	
2,3,4,7,8-Pentachlorodibenzofuran	pg/g	-	-	ND (0.075)	ND (0.068)	ND (0.067)	ND (0.16)	ND (3.1)	
1,2,3,7,8-Pentachlorodibenzo-p-dioxin	pg/g	-	-	ND (0.075)	ND (0.068)	ND (0.065)	ND (0.13)	ND (3.1)	
Total Pentachlorodibenzo-p-dioxin	pg/g	-	-	ND (0.075)	ND (0.068)	ND (0.067)	ND (0.16)	8.4	
1,2,3,4,7,8-Hexachlorodibenzofuran	pg/g	-	-	ND (0.11)	ND (0.15)	ND (0.083)	ND (0.43)	4.1 J	
1,2,3,6,7,8-Hexachlorodibenzofuran	pg/g	-	-	ND (0.09)	ND (0.09)	ND (0.070)	ND (0.2)	9	
2,3,4,6,7,8-Hexachlorodibenzofuran	pg/g	-	-	ND (0.11)	ND (0.11)	ND (0.083)	ND (0.29)	ND (1.9)	
1,2,3,7,8,9-Hexachlorodibenzofuran	pg/g	-	-	ND (0.12)	ND (0.12)	ND (0.094)	ND (0.29)	ND (0.64)	
Total Hexachlorodibenzofuran	pg/g	-	-	ND (0.35)	ND (1.6)	ND (0.094)	5.4	71	
1,2,3,4,6,7,8-Heptachlorodibenzofuran	pg/g	-	-	ND (1.5)	9.7	3.7 J	26	64	
1,2,3,4,7,8,9-Heptachlorodibenzofuran	pg/g	-	-	ND (0.21)	ND (0.15)	ND (0.13)	ND (0.22)	4.6 J	
Total Heptachlorodibenzofuran	pg/g	-	-	ND (1.5)	16	3.7	44	190	
1,2,3,4,6,7,8,9-Octachlorodibenzofuran	pg/g	-	-	ND (0.97)	ND (3.1)	ND (2)	9.1 J	95	
TEQ	pg/g	1,000	1,000	0.03	0.117	0.05	0.29	26.66	

TABLE 4

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

Sample ID:	S-13151-050406-KK-260	S-13151-050406-KK-261	S-13151-050406-KK-262	S-13151-051606-KK-283	S-13151-051606-KK-284
Date Sampled:	5/4/06	5/4/06	5/4/06	5/16/06	5/16/06
Sample Location:	Excavation Area 7-Floor 1	Excavation Area 7-Floor 2	Excavation Area 7-Floor 3	Excavation Area 5 (2-10 ft) Floor 6	Excavation Area 5 (2-10 ft) Floor 6
Sample Depth (feet bgs)	6.5	6.5	6.5	10	10

Selected Parameters

Soil Cleanup Criteria
0 - 2 feet bgs ⁽¹⁾ > 2 feet bgs ⁽²⁾

Dioxin Furans

2,3,7,8-Tetrachlorodibenzo-p-dioxin	pg/g	-	-	ND (0.1)	ND (0.27)	ND (0.38)	91	67
Total Tetrachlorodibenzo-p-dioxin	pg/g	-	-	ND (0.1)	ND (0.27)	ND (0.38)	7300	6400
1,2,3,7,8-Pentachlorodibenzofuran	pg/g	-	-	ND (0.17)	ND (0.27)	ND (0.25)	420	370
Total Pentachlorodibenzofuran	pg/g	-	-	ND (0.19)	ND (0.37)	ND (0.46)	8500	7500
1,2,3,4,7,8-Hexachlorodibenzo-p-dioxin	pg/g	-	-	ND (0.12)	ND (0.12)	ND (0.22)	410	390
1,2,3,6,7,8-Hexachlorodibenzo-p-dioxin	pg/g	-	-	ND (0.095)	ND (0.15)	ND (2.4)	670	520
1,2,3,7,8,9-Hexachlorodibenzo-p-dioxin	pg/g	-	-	ND (0.13)	ND (0.22)	ND (0.98)	510	530
Total Hexachlorodibenzo-p-dioxin	pg/g	-	-	ND (0.84)	ND (0.51)	9.1	15000	10000
1,2,3,4,6,7,8-Heptachlorodibenzo-p-dioxin	pg/g	-	-	ND (2)	ND (2.1)	22	3300 E	1900 JA
Total Heptachlorodibenzo-p-dioxin	pg/g	-	-	ND (2.3)	ND (2.1)	38	6800	4000
1,2,3,4,6,7,8,9-Octachlorodibenzo-p-dioxin	pg/g	-	-	21	25	96	5700	3300
2,3,7,8-Tetrachlorodibenzofuran	pg/g	-	-	ND (0.088)	ND (0.083)	ND (0.55) CON	1400 E, CON	890 E, CON
Total Tetrachlorodibenzofuran	pg/g	-	-	ND (0.088)	ND (0.083)	1.1	12000	9100
2,3,4,7,8-Pentachlorodibenzofuran	pg/g	-	-	ND (0.085)	ND (0.1)	ND (0.38)	770 JA	430
1,2,3,7,8-Pentachlorodibenzo-p-dioxin	pg/g	-	-	ND (0.084)	ND (0.1)	ND (0.56)	1400	820
Total Pentachlorodibenzo-p-dioxin	pg/g	-	-	ND (0.085)	ND (0.1)	ND (2.2)	8500	6400
1,2,3,4,7,8-Hexachlorodibenzofuran	pg/g	-	-	ND (0.14)	ND (0.11)	4.7 J	850	530
1,2,3,6,7,8-Hexachlorodibenzofuran	pg/g	-	-	ND (0.072)	ND (0.082)	ND (2.4)	990	510
2,3,4,6,7,8-Hexachlorodibenzofuran	pg/g	-	-	ND (0.085)	ND (0.097)	ND (2)	1100	560
1,2,3,7,8,9-Hexachlorodibenzofuran	pg/g	-	-	ND (0.096)	ND (0.11)	ND (0.22)	42	14
Total Hexachlorodibenzofuran	pg/g	-	-	ND (0.39)	ND (0.19)	190	7200	4200
1,2,3,4,6,7,8-Heptachlorodibenzofuran	pg/g	-	-	ND (1.7)	ND (0.38)	560	3400 E	2300
1,2,3,4,7,8,9-Heptachlorodibenzofuran	pg/g	-	-	ND (0.096)	ND (0.14)	ND (2)	100	65
Total Heptachlorodibenzofuran	pg/g	-	-	ND (1.7)	ND (0.66)	950	3900	2700
1,2,3,4,6,7,8,9-Octachlorodibenzofuran	pg/g	-	-	ND (1)	ND (0.70)	180	540	270
TEQ	pg/g	1,000	1,000	0.02	0.03	6.57	1710.44	1119.62

TABLE 4

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

Sample ID:	S-13151-051606-KK-285	S-13151-051606-KK-286	S-13151-051606-KK-287	S-13151-051606-KK-288	S-13151-051606-KK-289
Date Sampled:	5/16/06	5/16/06	5/16/06	5/16/06	5/16/06
Sample Location:	Excavation Area 5 (2-10 ft)	Excavation Area 5 (2-10 ft)	Excavation Area 5 (2-10 ft)	Excavation Area 5 (2-10 ft)	Excavation Area 5 (2-10 ft)
Sample Depth (feet bgs)	Wall 6 5-7	Floor 7 10	Wall 7 5-7	Floor 8 10	Wall 8 5-7

Selected Parameters

Soil Cleanup Criteria
0 - 2 feet bgs⁽¹⁾ > 2 feet bgs⁽²⁾

Dioxin Furans

2,3,7,8-Tetrachlorodibenzo-p-dioxin	pg/g	-	-	5.7	22	12 JA	110	11
Total Tetrachlorodibenzo-p-dioxin	pg/g	-	-	77	380	370	7800	180
1,2,3,7,8-Pentachlorodibenzofuran	pg/g	-	-	22	170	87	670	77
Total Pentachlorodibenzofuran	pg/g	-	-	130	1000	630	12000	490
1,2,3,4,7,8-Hexachlorodibenzo-p-dioxin	pg/g	-	-	19	59	39	730	28
1,2,3,6,7,8-Hexachlorodibenzo-p-dioxin	pg/g	-	-	140	1600	790	1400	1400
1,2,3,7,8,9-Hexachlorodibenzo-p-dioxin	pg/g	-	-	70	500	310	1000	450
Total Hexachlorodibenzo-p-dioxin	pg/g	-	-	1200	11000	6500	20000	11000
1,2,3,4,6,7,8-Heptachlorodibenzo-p-dioxin	pg/g	-	-	630	6300 E	2100	6200 E	5600 E
Total Heptachlorodibenzo-p-dioxin	pg/g	-	-	1300	12000	4700	13000	12000
1,2,3,4,6,7,8,9-Octachlorodibenzo-p-dioxin	pg/g	-	-	2600	5700	2900	13000 E	6200
2,3,7,8-Tetrachlorodibenzofuran	pg/g	-	-	ND(83) G, D, CON	120 CON, D	ND(140) G, D, CON	1700 E, CON	27 CON, D
Total Tetrachlorodibenzofuran	pg/g	-	-	590	1100	1400	13000	300
2,3,4,7,8-Pentachlorodibenzofuran	pg/g	-	-	58	85	120	1400	37
1,2,3,7,8-Pentachlorodibenzo-p-dioxin	pg/g	-	-	86	110	170	1900	57
Total Pentachlorodibenzo-p-dioxin	pg/g	-	-	630	850	1300	15000	430
1,2,3,4,7,8-Hexachlorodibenzofuran	pg/g	-	-	88	210	120	2400	100
1,2,3,6,7,8-Hexachlorodibenzofuran	pg/g	-	-	74	180	120	1600	84
2,3,4,6,7,8-Hexachlorodibenzofuran	pg/g	-	-	77	180	110	1600	90
1,2,3,7,8,9-Hexachlorodibenzofuran	pg/g	-	-	ND(3.4)	7.7	ND(3.5)	74	ND(7.6)
Total Hexachlorodibenzofuran	pg/g	-	-	830	15000	1500	13000	6200
1,2,3,4,6,7,8-Heptachlorodibenzofuran	pg/g	-	-	450	11000 E	770	8300 E	4300 E
1,2,3,4,7,8,9-Heptachlorodibenzofuran	pg/g	-	-	40	230	27 JA	300	1100
Total Heptachlorodibenzofuran	pg/g	-	-	970	36000	1800	9800	15000
1,2,3,4,6,7,8,9-Octachlorodibenzofuran	pg/g	-	-	270	9200 E	540	2200	3500
TEQ	pg/g	1,000	1,000	123.47	642.07	328.31	2683.6	406.5

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

Notes:

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

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

bgs - below ground surface.

mg/kg - micrograms per gram.

mg/kg - milligrams per kilogram.

pg/g - picograms per gram.

ug/kg - micrograms per kilogram

J - Method blank contamination.

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

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

E - Matrix Interference.

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

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

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

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

CON - Confirmation analysis

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

<i>Sample ID</i>	<i>Collection Date (mm/dd/yy)</i>	<i>Sample Location</i>	<i>Sample Depth</i>	<i>LNAPL Soil Test Requirements</i>	
				<i>Pass</i>	<i>Fail</i>
LPL-13151-051906-KK-150	5/19/2006	Excavation Area No.8	~18 feet bgs	X	
LPL-13151-052206-KK-151	5/22/2006	Excavation Area No.8	~14-16 feet bgs	X	
LPL-13151-052206-KK-152	5/22/2006	Excavation Area No.8	~18 feet bgs	X	
LPL-13151-052206-KK-153	5/22/2006	Excavation Area No.8	~18 feet bgs	X	
LPL-13151-052206-KK-154	5/22/2006	Excavation Area No.8	~18 feet bgs	X	
LPL-13151-052306-KK-155	5/23/2006	Excavation Area No.5	~20 feet bgs	X	
LPL-13151-052306-KK-156	5/23/2006	Excavation Area No.5	~15-18 feet bgs	X	
LPL-13151-052306-KK-157	5/23/2006	Excavation Area No.5	~20 feet bgs	X	
LPL-13151-052306-KK-158	5/23/2006	Excavation Area No.5	~20 feet bgs	X	
LPL-13151-052306-KK-159	5/23/2006	Excavation Area No.5	~20 feet bgs	X	
LPL-13151-052406-KK-160	5/24/2006	Excavation Area No.5	18 feet bgs	X	
LPL-13151-052406-KK-161	5/24/2006	Excavation Area No.5	~20 feet bgs	X	
LPL-13151-052506-KK-162	5/25/2006	Excavation Area No.5	~15-18 feet bgs	X	
LPL-13151-052506-KK-163	5/25/2006	Excavation Area No.5	~20 feet bgs	X	
LPL-13151-052506-KK-164	5/25/2006	Excavation Area No.5	~15-18 feet bgs	X	

Notes:

bgs - below ground surface.

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

<i>Sample ID</i>	<i>Collection Date (mm/dd/yy)</i>	<i>Sample Location</i>	<i>Discharge Permit Requirements</i>	
			<i>Pass</i>	<i>Fail</i>
W-37326-050106-KK-039	05/01/06	Tank #255609	X	
W-37326-050906-KK-040	05/09/06	Tank #259944	X	
W-37326-051006-KK-041	05/10/06	Tank #255609	X	
W-37326-051706-KK-042	05/17/06	Tank #255609	X	
W-37326-051806-KK-043	05/18/06	Tank #259944	X	
W-37326-052206-KK-045	05/22/06	Tank #255609	X	
W-37326-052406-KK-046	05/24/06	Tank #259944	X	
W-37326-052406-KK-047	05/24/06	Tank #255609	X	
W-37326-052606-KK-048	05/26/06	Tank #259944	X	



**CONESTOGA-ROVERS
& ASSOCIATES**

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Telephone: (905) 682-0510 Facsimile: (905) 682-8818
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July 10, 2006

Reference No. 13151-10

Mr. Mazin Enwiya
United States Environmental Protection Agency
Region 5
77 West Jackson Boulevard (SR-6J)
Chicago, IL 60604-3507

Dear Mr. Enwiya:

Re: Monthly Progress Report No. 44
Remedial Design/Remedial Action UAO
Former Rockwell International Corporation Site
Allegan, Michigan

On behalf of ArvinMeritor, Inc. (ArvinMeritor), and in accordance with Section XI, Paragraph 67 of the Unilateral Administrative Order (UAO) for the Former Rockwell International Site (Site) effective October 30, 2002, Conestoga-Rovers & Associates (CRA) has prepared the following progress report for the period of June 1, 2006 through June 30, 2006. Pursuant to Section XI, Paragraph 67 of the Administrative Order, this report is due at the United States Environmental Protection Agency (U.S. EPA) on July 10, 2006.

1. Activities Taken to Comply with the Administrative Order

During this reporting period, the following activities were undertaken:

- On June 12, 2006, Monthly Progress Report No. 43 was submitted to the U.S. EPA covering the period of May 1, 2006 through May 31, 2006;
- On June 21, 2006 delineation activities of the TSCA portion of Area No. 5 (LNAPL) were conducted;
- Excavation of contaminated soil and LNAPL impacted areas continued throughout the reporting period;
- Soil chemical and LNAPL verification samples were collected from completed Excavation Area No. 5 (>10 feet) and Area No. 7 (>10 feet) throughout the reporting period; and
- Treatment of wastewater through the on-Site wastewater treatment system continued throughout the reporting period.

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

In June 2006, CRA collected the following samples as part of the Remedial Action (RA):



<i>Sample ID</i>	<i>Sample Location</i>	<i>Laboratory Analysis</i>
S-13151-061906-KK-337	Dark soil observed within overburden	PCBs, SVOCs, metals
S-13151-062106-KK-338	Test Pit No. 1	PCBs
S-13151-062106-KK-339	Test Pit No. 2	PCBs
S-13151-062106-KK-340	Test Pit No. 2	PCBs
S-13151-062106-KK-341	Test Pit No. 3	PCBs
S-13151-062106-KK-342	Test Pit No. 3	PCBs
S-13151-062106-KK-343	Test Pit No. 3	PCBs
S-13151-062106-KK-344	Test Pit No. 4	PCBs
S-13151-062106-KK-345	Test Pit No. 4	PCBs

All samples were submitted under chain-of-custody protocol to Severn Trent Laboratories Inc. (STL) for laboratory analyses.

On June 19, 2006, while removing overburden in the vicinity of the former waste water treatment plant, soils differing from those that had previously been investigated as part of the Pre-Design Investigation Activities were noted. The differing soil was encountered at a depth of approximately 0 to 2 feet below ground surface (bgs) and was darker in color compared to the surrounding overburden. A sample (KK-337) of the differing soil was collected and submitted for laboratory analyses of total polychlorinated biphenyls (PCB), semi-volatile organic compounds (SVOC), and metals. A summary of the preliminary unvalidated soil sample analytical results is provided in Table 1.

The analytical results generated from the soil sample indicated that with the exception of arsenic and iron, the parameters analyzed were either not detected above the laboratory detection limit or below the 0 to 2 feet bgs Soil Cleanup Criteria. Arsenic was detected at a concentration of 16 mg/kg. Iron was detected at a concentration of 214,000 mg/kg. Both arsenic and iron exceed the 0 to 2 feet bgs Soil Cleanup Criteria of 7.6 mg/kg and 160,000 mg/kg respectively. It is noted that as the concentrations do not exceed the >2 feet bgs Soil Cleanup Criteria for arsenic and iron of 61 mg/kg and 1,000,000 mg/kg respectively, the soil was used as backfill on-Site at depths greater than 2 feet bgs.

On June 21, 2006, four test pits (TP-1, TP-2, TP-3, and TP-4) were excavated along the eastern boundary of the TSCA LNAPL portion of Area No. 5 (LNAPL) to facilitate collection of eight soil verification samples (KK-338 to KK-345). All eight samples were submitted for PCB analyses. The samples were collected at the request of Waste Management (WM) to confirm the extent of the TSCA LNAPL portion of Area No. 5 in order for WM to provide approval for off-Site disposal of the non-TSCA LNAPL portion of Area No.5. A summary of the preliminary unvalidated soil sample analytical results



is provided in Table 2. The analytical results indicated the PCB concentrations are below the criteria for disposal at a TSCA regulated facility of 50,000 µg/kg therefore the eastern boundary of the TSCA LNAPL portion of Area No. 5 was delineated. LNAPL impacted material to the east of the delineated boundary is suitable for off-site disposal as non-TSCA material.

During June 2006, 21 soil chemical verification samples were collected from Excavation Areas No. 5 (>10 feet) and Area No. 7 (>10 feet). All samples were submitted under chain-of-custody protocol to STL for laboratory analyses. A summary of the preliminary unvalidated soil chemical verification sample analytical results is provided in Tables 3 and 4. All soil chemical verification samples collected from Area No. 5 (>10 feet) were analyzed for polychlorinated dibenzo-p-dioxins/polychlorinated dibenzofurans (PCDD/PCDF). All soil chemical verification samples collected from Area No. 7 (>10 feet) were analyzed for PCBs. It should be noted that as discussed in Progress Report No. 43, four samples (KK-312 to KK-315) were collected from the 2 to 10 feet bgs portion of Area No. 5 and submitted for laboratory analysis of PCDD/PCDF. At the time Progress Report No. 43 was submitted to the U.S. EPA the analytical results for samples KK-312 to KK-315 had not been received. The analytical results are included herein. The following is a summary of the analytical results generated for each area.

Excavation Area No. 5 (2 to 10 feet)

As discussed in Progress Report No. 43, an exceedance of the applicable Soil Cleanup Criteria for >2 feet bgs was noted in sample KK-272 that was collected from the wall of the excavation. On May 26, 2006, further excavation in the vicinity of sample KK-272 was conducted. Four samples (KK-312 to KK-315) were collected and submitted for PCDD/PCDF analyses.

One exceedance of the applicable Soil Cleanup Criteria for >2 feet bgs was noted in sample KK-314 which was collected from the floor of the excavation. As the floor of the excavation overlaps with the underlying LNAPL portion of Area No. 5 further excavation and sampling related to this sample will be included as part of the LNAPL excavation.

For comparative reference, the PCDD/PCDF analytical results for all samples collected from Area No. 5 (2 to 10 feet) have been included in Table 3.

Excavation Area No. 5 (>10 feet)

On June 7 and 8, 2006, 10 soil verification samples (KK-316 to KK-325) were collected and submitted for PCDD/PCDF analyses from Area No. 5 (>10 feet). No exceedances of



the Soil Cleanup Criteria were noted therefore Area No. 5 (>10 feet) was deemed complete.

Excavation Area No. 7 (>10 feet)

On June 13, 2006, 11 soil verification samples (KK-326 to KK-336) were collected and submitted for PCB analyses from Area No. 7 (>10 feet). No exceedances of the Soil Cleanup Criteria for >2 feet bgs were noted therefore Area. No. 7 (>10 feet) was deemed complete.

In addition to the soil chemical verification samples collected, nine LNAPL soil verification samples were collected from Excavation Area No. 8. A summary of LNAPL soil verification samples is provided in Table 5 along with an indication of whether or not the sample passed or failed the LNAPL soil test. As shown in Table 5, no samples failed to meet the LNAPL soil test requirements.

In June 2006, nine wastewater samples were collected from the on-Site water treatment system to determine compliance with the City of Allegan wastewater discharge permit requirements. In addition, one sample (KK-055) of surface water that had accumulated within the former wastewater treatment pond area was collected in order to ensure compliance with the discharge permit requirements. All wastewater samples were submitted under chain-of-custody protocol to KAR Laboratories Inc. A summary of wastewater samples is provided in Table 6 along with an indication of whether the sample passed or failed the discharge permit requirements. As shown in Table 6, no samples failed to meet the discharge permit requirements.

3. Actions Planned for the Next 90-Days

The following activities are anticipated for the next 90 days:

- Continued discussion with WM regarding approval for disposal of soils from the remaining excavation areas to be completed in 2006;
- Excavation of contaminated soil and LNAPL impacted areas;
- Participate in pre-final inspection scheduled for July 18, 2006 at 1 p.m. EST.; and
- Begin Site balancing and final grading activities.

4. On-Going Considerations Related to the Administrative Order

Although access was granted by the City of Allegan to implement the RA, restrictive covenant agreements with the City continue to remain unresolved. Conference calls



**CONESTOGA-ROVERS
& ASSOCIATES**

July 10, 2006

5

Reference No. 13151-10

with counsel for the City of Allegan and U.S. EPA Assistant Regional Counsel, Kathleen Schnieders, resulted in the conclusion that the restrictive covenant requirement would be deferred at this time.

We trust this progress report provides you with the information required to assess the status of this project. Should you have any questions on the above, please do not hesitate to contact us.

Yours truly,

CONESTOGA-ROVERS & ASSOCIATES

Gregory A. Carli, P. E.

JP/jp/19

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



NO.	Revision	Date	Initial

N

0 40 80ft

LEGEND

- TRANSFORMER
- FENCE
- SHORE LINE
- SITE BOUNDARY
- CONTOUR
- APPROXIMATE LIMIT OF POND
- CONCRETE FILLED PIT
- SAND FILLED PIT
- OPEN PIT
- CONCRETE TO BE REMOVED
- APPROXIMATE EXTENT OF SOIL EXCAVATION (0-2 ft BGS)
- APPROXIMATE EXTENT OF SOIL EXCAVATION (>10 ft BGS)
- APPROXIMATE EXTENT OF SOIL EXCAVATION (>10 ft BGS TO WATER TABLE)
- APPROXIMATE EXTENT OF EXCAVATION (TO REMOVE LNAPL)
- EXCAVATION AREAS

SCALE VERIFICATION
THIS BAR MEASURES 1" ON ORIGINAL. ADJUST SCALE ACCORDINGLY.

Approved _____

DRAWING STATUS

Status	Date	Initial

**FORMER ROCKWELL INTERNATIONAL CORP. SITE
ALLEGAN, MICHIGAN**

AREAS REQUIRING EXCAVATION

CRA CONESTOGA-ROVERS & ASSOCIATES

Source Reference:

Project Manager: G.A.C.	Reviewed By: G.C.	Date: OCTOBER 2005
Scale: AS SHOWN	Project No.: 13151-10	Report No.: ENW1008 Drawing No.: figure 1

TABLE 1

**SUMMARY OF SOIL SAMPLING ANALYTICAL RESULTS
FORMER ROCKWELL INTERNATIONAL CORPORATION
ALLEGAN, MICHIGAN**

Sample ID: S-13151-061906-KK-337
Date Sampled: 6/19/2006
Sample Location: verburden within vicinity of former WWTF
Sample Depth (ft bgs): 0-2

Parameter	Units	Soil Cleanup Criteria	
0-2 feet bgs ⁽¹⁾			
Semivolatile Organic Compounds			
Polynuclear Aromatics			
Acenaphthene	ug/kg	41,000,000	ND (61000)
Acenaphthylene	ug/kg	1,600,000	ND (61000)
Anthracene	ug/kg	230,000,000	ND (61000)
Benzo(a)anthracene	ug/kg	20,000	1900 J
Benzo(a)pyrene	ug/kg	2,000	ND (61000)
Benzo(b)fluoranthene	ug/kg	20,000	ND (61000)
Benzo(g,h,i)perylene	ug/kg	2,500,000	ND (61000)
Benzo(k)fluoranthene	ug/kg	200,000	ND (61000)
Chrysene	ug/kg	2,000,000	2100 J
Dibenz(a,h)anthracene	ug/kg	2,000	ND (61000)
Fluoranthene	ug/kg	46,000,000	ND (61000)
Fluorene	ug/kg	27,000,000	ND (61000)
Indeno(1,2,3-cd)pyrene	ug/kg	20,000	ND (61000)
2-Methylnaphthalene	ug/kg	8,100,000	ND (61000)
Naphthalene	ug/kg	16,000,000	ND (61000)
Phenanthrene	ug/kg	1,600,000	ND (61000)
Pyrene	ug/kg	29,000,000	ND (61000)
Polychlorinated Biphenyls			
Aroclor-1016	ug/kg	1,000	ND (610)
Aroclor-1221	ug/kg	1,000	ND (610)
Aroclor-1232	ug/kg	1,000	ND (610)
Aroclor-1242	ug/kg	1,000	ND (610)
Aroclor-1248	ug/kg	1,000	250 J
Aroclor-1254	ug/kg	1,000	ND (610)
Aroclor-1260	ug/kg	1,000	330 J
Metals			
Silver	mg/kg	2,500	0.34
Aluminum	mg/kg	50,000	4,130
Arsenic	mg/kg	7.6	16
Barium	mg/kg	37,000	230
Beryllium	mg/kg	410	0.56 B, G
Cadmium	mg/kg	550	0.86
Cobalt	mg/kg	2,600	25.5
Chromium	mg/kg	790,000	175
Copper	mg/kg	20,000	367
Iron	mg/kg	160,000	214,000 J
Mercury	mg/kg	160	0.12
Manganese	mg/kg	25,000	3,120 J
Nickel	mg/kg	40,000	244
Lead	mg/kg	400	346
Antimony	mg/kg	180	0.94
Selenium	mg/kg	2,600	ND (0.18)
Thallium	mg/kg	35	0.054 B
Vanadium	mg/kg	750	25.9
Zinc	mg/kg	170,000	99.3 J

Notes:

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

bgs - below ground surface.

J - Method blank contamination. The associated method blank contains the target analyte at a reportable level.

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

B - Estimated result. Result is less than reporting limit.

ug/kg - micrograms per kilogram.

mg/kg - milligrams per kilogram.

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

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

TABLE 2

**SUMMARY OF DELINEATION SOIL SAMPLING ANALYTICAL RESULTS
FORMER ROCKWELL INTERNATIONAL CORPORATION
ALLEGAN, MICHIGAN**

		Sample ID:	S-13151-062106-KK-338	S-13151-062106-KK-339	S-13151-062106-KK-340	S-13151-062106-KK-341
		Date Sampled:	6/21/06	6/21/06	6/21/06	6/21/06
		Sample Location:	Excavation Area 2 - TSCA border Location 1	Excavation Area 2 - TSCA border Location 2	Excavation Area 2 - TSCA border Location 2	Excavation Area 2 - TSCA border Location 3
		Sample Depth (feet bgs)	12-14	12-14	14-15	12-14
Parameters	Units	TSCA Criteria				
Polychlorinated Biphenyls						
Aroclor-1016	ug/kg	50,000	ND (310)	ND (300)	ND (370)	ND (290)
Aroclor-1221	ug/kg	50,000	ND (310)	ND (300)	ND (370)	ND (290)
Aroclor-1232	ug/kg	50,000	ND (310)	ND (300)	ND (370)	ND (290)
Aroclor-1242	ug/kg	50,000	ND (310)	ND (300)	ND (370)	ND (290)
Aroclor-1248	ug/kg	50,000	ND (310)	ND (300)	ND (370)	ND (290)
Aroclor-1254	ug/kg	50,000	2,400	770	ND (370)	240 J
Aroclor-1260	ug/kg	50,000	ND (310)	ND (300)	ND (370)	ND (290)
Sample ID:						
		Date Sampled:	S-13151-062106-KK-342	S-13151-062106-KK-343	S-13151-062106-KK-344	S-13151-062106-KK-345
		Sample Location:	Excavation Area 2 - TSCA border Location 3	Excavation Area 2 - TSCA border Location 3	Excavation Area 2 - TSCA border Location 4	Excavation Area 2 - TSCA border Location 4
		Sample Depth (feet bgs)	12-14	14-15	12-14	14-15
Parameters	Units	TSCA Criteria				
Polychlorinated Biphenyls						
Aroclor-1016	ug/kg	50,000	ND (290)	ND (370)	ND (370)	ND (380)
Aroclor-1221	ug/kg	50,000	ND (290)	ND (370)	ND (370)	ND (380)
Aroclor-1232	ug/kg	50,000	ND (290)	ND (370)	ND (370)	ND (380)
Aroclor-1242	ug/kg	50,000	ND (290)	ND (370)	ND (370)	ND (380)
Aroclor-1248	ug/kg	50,000	ND (290)	ND (370)	ND (370)	ND (380)
Aroclor-1254	ug/kg	50,000	520	ND (370)	1,100	380
Aroclor-1260	ug/kg	50,000	ND (290)	ND (370)	ND (370)	ND (380)

TABLE 3

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

		Sample ID: S-13151-050906-KK-272	S-13151-050906-KK-273	S-13151-050906-KK-274	S-13151-050906-KK-275
		Date Sampled: 5/9/06	5/9/06	5/9/06	5/9/06
		Excavation Area 5 (2-10 ft)	Excavation Area 5 (2-10 ft)	Excavation Area 5 (2-10 ft)	Excavation Area 5 (2-10 ft)
		Sample Location: Floor 1	Floor 2	Wall 2	Wall 1
		Sample Depth (feet bgs) 10	10	5-7	5-7
Parameters	Units	Soil Cleanup Criteria			
		> 2 feet bgs ⁽¹⁾			
Dioxin Furans					
2,3,7,8-Tetrachlorodibenzo-p-dioxin	pg/g	-	71	3.9	ND (2.4)
Total Tetrachlorodibenzo-p-dioxin	pg/g	-	1,200	66	ND (2.5)
1,2,3,7,8-Pentachlorodibenzofuran	pg/g	-	860 JA	19 JA	ND (5.4)
Total Pentachlorodibenzofuran	pg/g	-	3,900	130	ND (5.4)
1,2,3,4,7,8-Hexachlorodibenzo-p-dioxin	pg/g	-	460	13	ND (4.8)
1,2,3,6,7,8-Hexachlorodibenzo-p-dioxin	pg/g	-	5,600	160	24 J
1,2,3,7,8,9-Hexachlorodibenzo-p-dioxin	pg/g	-	210	69	ND (9.9)
Total Hexachlorodibenzo-p-dioxin	pg/g	-	42,000	1,200	180
1,2,3,4,6,7,8-Heptachlorodibenzo-p-dioxin	pg/g	-	19,000	440	99
Total Heptachlorodibenzo-p-dioxin	pg/g	-	39,000	900	180
1,2,3,4,6,7,8,9-Octachlorodibenzo-p-dioxin	pg/g	-	11,000	700	190
2,3,7,8-Tetrachlorodibenzofuran	pg/g	-	80 CON	42 CON	6.8 CON
Total Tetrachlorodibenzofuran	pg/g	-	700	400	69
2,3,4,7,8-Pentachlorodibenzofuran	pg/g	-	75 JA	43 JA	ND (3.0)
1,2,3,7,8-Pentachlorodibenzo-p-dioxin	pg/g	-	240 JA	49 JA	ND (8.8)
Total Pentachlorodibenzo-p-dioxin	pg/g	-	710	340	14
1,2,3,4,7,8-Hexachlorodibenzofuran	pg/g	-	250	44	ND (7.4)
1,2,3,6,7,8-Hexachlorodibenzofuran	pg/g	-	200	29	ND (2.6)
2,3,4,6,7,8-Hexachlorodibenzofuran	pg/g	-	120	22	ND (7.0)
1,2,3,7,8,9-Hexachlorodibenzofuran	pg/g	-	ND (13)	ND (1.3)	ND (2.9)
Total Hexachlorodibenzofuran	pg/g	-	13,000	780	220
1,2,3,4,6,7,8-Heptachlorodibenzofuran	pg/g	-	10,000	820	340
1,2,3,4,7,8,9-Heptachlorodibenzofuran	pg/g	-	360	19	ND (6.7)
Total Heptachlorodibenzofuran	pg/g	-	32,000	1,800	670
1,2,3,4,6,7,8,9-Octachlorodibenzofuran	pg/g	-	9,700	520	190
Total TEQ Concentration	pg/g	1,000	1,631	91.41	7.85

TABLE 3

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

		Sample ID:	S-13151-051006-KK-276	S-13151-051006-KK-277	S-13151-051006-KK-278	S-13151-051006-KK-279
		Date Sampled:	5/10/06	5/10/06	5/10/06	5/10/06
		Sample Location:	Excavation Area 5 (2-10 ft)	Excavation Area 5 (2-10 ft)	Excavation Area 5 (2-10 ft)	Excavation Area 5 (2-10 ft)
		Sample Depth (feet bgs)	Wall 3 5-7	Floor 3 10	Floor 3 10	Floor 4 10
Parameters	Units	Soil Cleanup Criteria	> 2 feet bgs ⁽¹⁾			
Dioxin Furans						
2,3,7,8-Tetrachlorodibenzo-p-dioxin	pg/g	-	53	66	85	59
Total Tetrachlorodibenzo-p-dioxin	pg/g	-	890	3,900	3,800	520
1,2,3,7,8-Pentachlorodibenzofuran	pg/g	-	300 JA	530	780	650 JA
Total Pentachlorodibenzofuran	pg/g	-	1,400	5,700	7,600	2,400
1,2,3,4,7,8-Hexachlorodibenzo-p-dioxin	pg/g	-	310	570	690	350
1,2,3,6,7,8-Hexachlorodibenzo-p-dioxin	pg/g	-	4,800	4,600	7,500	13,000
1,2,3,7,8,9-Hexachlorodibenzo-p-dioxin	pg/g	-	1,800	2,200	3,200	5,900
Total Hexachlorodibenzo-p-dioxin	pg/g	-	37,000	42,000	65,000	91,000
1,2,3,4,6,7,8-Heptachlorodibenzo-p-dioxin	pg/g	-	23,000	12,000	17,000 E	37,000 E
Total Heptachlorodibenzo-p-dioxin	pg/g	-	55,000	26,000	34,000	74,000
1,2,3,4,6,7,8,9-Octachlorodibenzo-p-dioxin	pg/g	-	14,000	7,200	7,900	19,000
2,3,7,8-Tetrachlorodibenzofuran	pg/g	-	110 CON	550 CON	370 CON	88 CON
Total Tetrachlorodibenzofuran	pg/g	-	1,300	7,700	6,400	700
2,3,4,7,8-Pentachlorodibenzofuran	pg/g	-	97 JA	410	280	76
1,2,3,7,8-Pentachlorodibenzo-p-dioxin	pg/g	-	240 JA	820	600	170
Total Pentachlorodibenzo-p-dioxin	pg/g	-	1,200	5,900	4,600	890
1,2,3,4,7,8-Hexachlorodibenzofuran	pg/g	-	130	640	390	230
1,2,3,6,7,8-Hexachlorodibenzofuran	pg/g	-	110	510	410	200
2,3,4,6,7,8-Hexachlorodibenzofuran	pg/g	-	110	500	380	120
1,2,3,7,8,9-Hexachlorodibenzofuran	pg/g	-	ND (6.8)	22 J	ND (17)	ND (31)
Total Hexachlorodibenzofuran	pg/g	-	9,400	9,600	9,400	10,000
1,2,3,4,6,7,8-Heptachlorodibenzofuran	pg/g	-	4,900	4,600	5,000	9,700
1,2,3,4,7,8,9-Heptachlorodibenzofuran	pg/g	-	210	200	190	210
Total Heptachlorodibenzofuran	pg/g	-	17,000	9,900	11,000	24,000
1,2,3,4,6,7,8,9-Octachlorodibenzofuran	pg/g	-	4,100	1,800	1,800	7,000
Total TEQ Concentration	pg/g	1,000	1,364.10	1,892.20	2,314.60	2,951.70

TABLE 3

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

		Sample ID:	S-13151-051006-KK-280	S-13151-051006-KK-281	S-13151-051006-KK-282	S-13151-052606-KK-312
		Date Sampled:	5/10/06	5/10/06	5/10/06	5/26/06
		Sample Location:	Excavation Area 5 (2-10 ft)	Excavation Area 5 (2-10 ft)	Excavation Area 5 (2-10 ft)	Excavation Area 5 (2-10 ft)
		Sample Depth (feet bgs)	Floor 5 10	Wall 4 5-7	Wall 5 5-7	Wall 9 5-7
Parameters	Units	Soil Cleanup Criteria	> 2 feet bgs ⁽¹⁾			
Dioxin Furans						
2,3,7,8-Tetrachlorodibenzo-p-dioxin	pg/g	-	ND (0.44)	ND (5.6)	11	ND (21)
Total Tetrachlorodibenzo-p-dioxin	pg/g	-	10	71	270	ND (21)
1,2,3,7,8-Pentachlorodibenzofuran	pg/g	-	ND (1.4)	ND (29)	51 JA	ND (32)
Total Pentachlorodibenzofuran	pg/g	-	4.1	ND (29)	450	ND (32)
1,2,3,4,7,8-Hexachlorodibenzo-p-dioxin	pg/g	-	ND (1.7)	ND (18)	63	ND (34)
1,2,3,6,7,8-Hexachlorodibenzo-p-dioxin	pg/g	-	5.1 J	210	210	ND (59)
1,2,3,7,8,9-Hexachlorodibenzo-p-dioxin	pg/g	-	ND (3.5)	91	130	ND (30)
Total Hexachlorodibenzo-p-dioxin	pg/g	-	36	1,600	2,300	170
1,2,3,4,6,7,8-Heptachlorodibenzo-p-dioxin	pg/g	-	23	1,600	1,500	310
Total Heptachlorodibenzo-p-dioxin	pg/g	-	41	3,700	2,900	590
1,2,3,4,6,7,8,9-Octachlorodibenzo-p-dioxin	pg/g	-	98	6,400	5,700	860
2,3,7,8-Tetrachlorodibenzofuran	pg/g	-	5.2 CON	170 CON	140 CON	54 CON
Total Tetrachlorodibenzofuran	pg/g	-	77	1,000	2,000	610
2,3,4,7,8-Pentachlorodibenzofuran	pg/g	-	6.4 J	120 JA	200 JA	ND (43)
1,2,3,7,8-Pentachlorodibenzo-p-dioxin	pg/g	-	9.3	160 JA	390 JA	ND (36)
Total Pentachlorodibenzo-p-dioxin	pg/g	-	67	730	2,500	130
1,2,3,4,7,8-Hexachlorodibenzofuran	pg/g	-	15	230	330	76 J
1,2,3,6,7,8-Hexachlorodibenzofuran	pg/g	-	14	170	320	ND (45)
2,3,4,6,7,8-Hexachlorodibenzofuran	pg/g	-	11	45 J	250	ND (43)
1,2,3,7,8,9-Hexachlorodibenzofuran	pg/g	-	ND (0.80)	ND (10)	ND (11)	ND (44)
Total Hexachlorodibenzofuran	pg/g	-	98	1,400	3,000	1,100
1,2,3,4,6,7,8-Heptachlorodibenzofuran	pg/g	-	110	910	1,800	1,300
1,2,3,4,7,8,9-Heptachlorodibenzofuran	pg/g	-	6.9 J	69	170	ND (37)
Total Heptachlorodibenzofuran	pg/g	-	150	1,700	2,700	2,800
1,2,3,4,6,7,8,9-Octachlorodibenzofuran	pg/g	-	530	780	820	740
Total TEQ Concentration	pg/g	1,000	12.077	210.57	432.52	30.7

TABLE 3

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

	Sample ID:	S-13151-052606-KK-313	S-13151-052606-KK-314	S-13151-052606-KK-315	S-13151-060706-KK-316
	Date Sampled:	5/26/06	5/26/06	5/26/06	6/7/06
	Sample Location:	Excavation Area 5 (2-10 ft)	Excavation Area 5 (2-10 ft)	Excavation Area 5 (2-10 ft)	Excavation Area 5 (>10 ft)
	Sample Depth (feet bgs)	Wall 10 5-7	Floor 9 10	Wall 11 5-7	Wall 1 13-15
Parameters	Units	Soil Cleanup Criteria > 2 feet bgs ⁽¹⁾			
Dioxin Furans					
2,3,7,8-Tetrachlorodibenzo-p-dioxin	pg/g	-	ND (6.8)	31	ND (6.8)
Total Tetrachlorodibenzo-p-dioxin	pg/g	-	ND (6.8)	690	ND (6.8)
1,2,3,7,8-Pentachlorodibenzofuran	pg/g	-	ND (14)	260	ND (14)
Total Pentachlorodibenzofuran	pg/g	-	ND (19)	2,300	ND (14)
1,2,3,4,7,8-Hexachlorodibenzo-p-dioxin	pg/g	-	ND (15)	210	ND (25)
1,2,3,6,7,8-Hexachlorodibenzo-p-dioxin	pg/g	-	ND (14)	1,700	ND (23)
1,2,3,7,8,9-Hexachlorodibenzo-p-dioxin	pg/g	-	ND (14)	750	ND (22)
Total Hexachlorodibenzo-p-dioxin	pg/g	-	ND (15)	12,000	ND (25)
1,2,3,4,6,7,8-Heptachlorodibenzo-p-dioxin	pg/g	-	100 J	6,200	68 J
Total Heptachlorodibenzo-p-dioxin	pg/g	-	200	14,000	68
1,2,3,4,6,7,8,9-Octachlorodibenzo-p-dioxin	pg/g	-	1,300	5,600	590
2,3,7,8-Tetrachlorodibenzofuran	pg/g	-	ND (5.5)	67 JA, CON	ND (8.1)
Total Tetrachlorodibenzofuran	pg/g	-	ND (5.5)	1,000	ND (8.1)
2,3,4,7,8-Pentachlorodibenzofuran	pg/g	-	ND (8.8)	210	ND (8.0)
1,2,3,7,8-Pentachlorodibenzo-p-dioxin	pg/g	-	ND (8.5)	450	ND (7.8)
Total Pentachlorodibenzo-p-dioxin	pg/g	-	ND (8.8)	4,300	ND (8.9)
1,2,3,4,7,8-Hexachlorodibenzofuran	pg/g	-	ND (11)	460	ND (14)
1,2,3,6,7,8-Hexachlorodibenzofuran	pg/g	-	ND (10)	830	ND (13)
2,3,4,6,7,8-Hexachlorodibenzofuran	pg/g	-	ND (11)	850	ND (14)
1,2,3,7,8,9-Hexachlorodibenzofuran	pg/g	-	ND (12)	ND (71)	ND (14)
Total Hexachlorodibenzofuran	pg/g	-	ND (18)	11,000	ND (52)
1,2,3,4,6,7,8-Heptachlorodibenzofuran	pg/g	-	76 J	5,600	200
1,2,3,4,7,8,9-Heptachlorodibenzofuran	pg/g	-	ND (7.8)	200	ND (14)
Total Heptachlorodibenzofuran	pg/g	-	150	13,000	390
1,2,3,4,6,7,8,9-Octachlorodibenzofuran	pg/g	-	ND (53)	2,800	150 J
Total TEQ Concentration	pg/g	1,000	3.06	1,036.10	3.42
					535.95

TABLE 3

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

		Sample ID:	S-13151-060706-KK-317	S-13151-060706-KK-318	S-13151-060706-KK-319	S-13151-060706-KK-320
		Date Sampled:	6/7/06	6/7/06	6/7/06	6/7/06
		Sample Location:	Excavation Area 5 (>10 ft)	Excavation Area 5 (>10 ft)	Excavation Area 5 (>10 ft)	Excavation Area 5 (>10 ft)
		Sample Depth (feet bgs)	Floor 1	Floor 1	Wall 2	Floor 2
			16	16	13-15	16
Parameters	Units	Soil Cleanup Criteria	> 2 feet bgs ⁽¹⁾			
Dioxin Furans						
2,3,7,8-Tetrachlorodibenzo-p-dioxin	pg/g	-	ND (6.7)	ND (3.6)	ND (5.5)	ND (1.8)
Total Tetrachlorodibenzo-p-dioxin	pg/g	-	12	ND (6.0)	340	ND (4.4)
1,2,3,7,8-Pentachlorodibenzofuran	pg/g	-	ND (31)	ND (9.1)	ND (14)	ND (4.0)
Total Pentachlorodibenzofuran	pg/g	-	58	ND (29)	350	ND (7.2)
1,2,3,4,7,8-Hexachlorodibenzo-p-dioxin	pg/g	-	ND (38)	ND (14)	ND (15)	ND (3.8)
1,2,3,6,7,8-Hexachlorodibenzo-p-dioxin	pg/g	-	250	79 J	61 J	ND (5.2)
1,2,3,7,8,9-Hexachlorodibenzo-p-dioxin	pg/g	-	140	53 J	41 J	ND (4.8)
Total Hexachlorodibenzo-p-dioxin	pg/g	-	1,800	540	730	ND (16)
1,2,3,4,6,7,8-Heptachlorodibenzo-p-dioxin	pg/g	-	5,200	1,600	220	ND (24)
Total Heptachlorodibenzo-p-dioxin	pg/g	-	9,300	3,100	450	ND (24)
1,2,3,4,6,7,8,9-Octachlorodibenzo-p-dioxin	pg/g	-	38,000	13,000	480	66 J
2,3,7,8-Tetrachlorodibenzofuran	pg/g	-	20 JA, CON	19 CON	56 CON	8.5 J, CON
Total Tetrachlorodibenzofuran	pg/g	-	130	120	1,100	57
2,3,4,7,8-Pentachlorodibenzofuran	pg/g	-	85 J	ND (24)	47 J	ND (5.5)
1,2,3,7,8-Pentachlorodibenzo-p-dioxin	pg/g	-	91	ND (32)	74	ND (6.1)
Total Pentachlorodibenzo-p-dioxin	pg/g	-	1,300	470	590	ND (15)
1,2,3,4,7,8-Hexachlorodibenzofuran	pg/g	-	200	62	55 J	ND (11)
1,2,3,6,7,8-Hexachlorodibenzofuran	pg/g	-	1,800	390	46 J	ND (4.5)
2,3,4,6,7,8-Hexachlorodibenzofuran	pg/g	-	420	140	51 J	ND (4.7)
1,2,3,7,8,9-Hexachlorodibenzofuran	pg/g	-	ND (16)	ND (7.8)	ND (3.8)	ND (3.5)
Total Hexachlorodibenzofuran	pg/g	-	14,000	3,800	540	ND (11)
1,2,3,4,6,7,8-Heptachlorodibenzofuran	pg/g	-	26,000	8,000	510	ND (16)
1,2,3,4,7,8,9-Heptachlorodibenzofuran	pg/g	-	100	ND (23)	ND (5.7)	ND (5.7)
Total Heptachlorodibenzofuran	pg/g	-	38,000	11,000	670	ND (16)
1,2,3,4,6,7,8,9-Octachlorodibenzofuran	pg/g	-	8,000	2,400	160	ND (9.9)
Total TEQ Concentration	pg/g	1,000	692.2	185.7	78.24	0.916

TABLE 3

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

	Sample ID:	S-13151-060706-KK-321	S-13151-060806-KK-322	S-13151-060806-KK-323	S-13151-060806-KK-324	S-13151-060806-KK-325
	Date Sampled:	6/7/06	6/8/06	6/8/06	6/8/06	6/8/06
	Sample Location:	Excavation Area 5 (>10 ft)	Excavation Area 5 (>10 ft)	Excavation Area 5 (>10 ft)	Excavation Area 5 (>10 ft)	Excavation Area 5 (>10 ft)
	Sample Depth (feet bgs)	Wall 3 13-15	Floor 3 16	Floor 4 16	Wall 4 13-15	Floor 5 16
Parameters	Units	Soil Cleanup Criteria > 2 feet bgs ⁽¹⁾				
Dioxin Furans						
2,3,7,8-Tetrachlorodibenzo-p-dioxin	pg/g	-	ND (14), G	ND (3.7)	7.7 J, JA	ND (5.2)
Total Tetrachlorodibenzo-p-dioxin	pg/g	-	68	ND (3.7)	490	140
1,2,3,7,8-Pentachlorodibenzofuran	pg/g	-	ND (70)	ND (8.9)	ND (26)	ND (16)
Total Pentachlorodibenzofuran	pg/g	-	ND (70)	ND (8.9)	300	87
1,2,3,4,7,8-Hexachlorodibenzo-p-dioxin	pg/g	-	93 JA	ND (12)	ND (31)	ND (11)
1,2,3,6,7,8-Hexachlorodibenzo-p-dioxin	pg/g	-	630	ND (11)	71	41 J
1,2,3,7,8,9-Hexachlorodibenzo-p-dioxin	pg/g	-	290	ND (11)	39 J, JA	ND (35)
Total Hexachlorodibenzo-p-dioxin	pg/g	-	4,800	ND (12)	1,200	490
1,2,3,4,6,7,8-Heptachlorodibenzo-p-dioxin	pg/g	-	1,600	ND (12)	350	150
Total Heptachlorodibenzo-p-dioxin	pg/g	-	3,100	ND (12)	700	310
1,2,3,4,6,7,8,9-Octachlorodibenzo-p-dioxin	pg/g	-	2,300	77 J	880	470
2,3,7,8-Tetrachlorodibenzofuran	pg/g	-	45 JA, CON	ND (2.8)	110 JA, CON	28 CON
Total Tetrachlorodibenzofuran	pg/g	-	1,000	ND (2.8)	2,300	610
2,3,4,7,8-Pentachlorodibenzofuran	pg/g	-	57 J, JA	ND (4.6)	120	ND (30)
1,2,3,7,8-Pentachlorodibenzo-p-dioxin	pg/g	-	48 J, JA	ND (4.5)	170	51 J
Total Pentachlorodibenzo-p-dioxin	pg/g	-	450	ND (7.6)	1,400	240
1,2,3,4,7,8-Hexachlorodibenzofuran	pg/g	-	67 J, JA	ND (11)	160	ND (34)
1,2,3,6,7,8-Hexachlorodibenzofuran	pg/g	-	58 J, JA	ND (9.5)	120	ND (31)
2,3,4,6,7,8-Hexachlorodibenzofuran	pg/g	-	57 J, JA	ND (11)	130	ND (35)
1,2,3,7,8,9-Hexachlorodibenzofuran	pg/g	-	ND (37)	ND (12)	ND (17)	ND (10)
Total Hexachlorodibenzofuran	pg/g	-	800	ND (12)	960	120
1,2,3,4,6,7,8-Heptachlorodibenzofuran	pg/g	-	660	ND (9.2)	430	110
1,2,3,4,7,8,9-Heptachlorodibenzofuran	pg/g	-	42 J	ND (11)	ND (20)	ND (13)
Total Heptachlorodibenzofuran	pg/g	-	1,600	ND (11)	530	150
1,2,3,4,6,7,8,9-Octachlorodibenzofuran	pg/g	-	440	ND (15)	120 J, JA	ND (40)
Total TEQ Concentration	pg/g	1,000	176.56	0.077	170.5	35.97
						0.12

TABLE 4

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

Sample ID:	S-13151-061306-KK-326	S-13151-061306-KK-327	S-13151-061306-KK-328	S-13151-061306-KK-329	S-13151-061306-KK-330	S-13151-061306-KK-331
Date Sampled:	6/13/06	6/13/06	6/13/06	6/13/06	6/13/06	6/13/06
Sample Location:	Excavation Area 7 (>10 ft) Wall 1	Excavation Area 7 (>10 ft) Floor 1	Excavation Area 7 (>10 ft) Wall 2	Excavation Area 7 (>10 ft) Floor 2	Excavation Area 7 (>10 ft) Floor 2	Excavation Area 7 (>10 ft) Wall 3
Sample Depth (feet bgs)	17-19	20	17-19	20	20	17-19

Parameters **Soil Cleanup Criteria**
> 2 feet bgs ⁽¹⁾

Polychlorinated Biphenyls

Aroclor-1016	ug/kg	10,000	ND (420)	ND (350)	ND (330)	ND (340)	ND (340)	ND (340)
Aroclor-1221	ug/kg	10,000	ND (420)	ND (350)	ND (330)	ND (340)	ND (340)	ND (340)
Aroclor-1232	ug/kg	10,000	ND (420)	ND (350)	ND (330)	ND (340)	ND (340)	ND (340)
Aroclor-1242	ug/kg	10,000	ND (420)	ND (350)	ND (330)	ND (340)	ND (340)	ND (340)
Aroclor-1248	ug/kg	10,000	ND (420)	ND (350)	ND (330)	ND (340)	ND (340)	ND (340)
Aroclor-1254	ug/kg	10,000	2,300	110 J	79 J	6.1 J	13 J	40 J
Aroclor-1260	ug/kg	10,000	ND (420)	ND (350)	ND (330)	ND (340)	ND (340)	ND (340)

Sample ID:	S-13151-061306-KK-332	S-13151-061306-KK-333	S-13151-061306-KK-334	S-13151-061306-KK-335	S-13151-061306-KK-336
Date Sampled:	6/13/06	6/13/06	6/13/06	6/13/06	6/13/06
Sample Location:	Excavation Area 7 (>10 ft) Floor 3	Excavation Area 7 (>10 ft) Floor 4	Excavation Area 7 (>10 ft) Floor 5	Excavation Area 7 (>10 ft) Floor 6	Excavation Area 7 (>10 ft) Wall 4
Sample Depth (feet bgs)	20	20	20	20	17-19

Parameters **Soil Cleanup Criteria**
> 2 feet bgs ⁽¹⁾

Polychlorinated Biphenyls

Aroclor-1016	ug/kg	10,000	ND (340)	ND (330)	ND (310)	ND (340)	ND (350)
Aroclor-1221	ug/kg	10,000	ND (340)	ND (330)	ND (310)	ND (340)	ND (350)
Aroclor-1232	ug/kg	10,000	ND (340)	ND (330)	ND (310)	ND (340)	ND (350)
Aroclor-1242	ug/kg	10,000	ND (340)	ND (330)	ND (310)	ND (340)	ND (350)
Aroclor-1248	ug/kg	10,000	ND (340)	ND (330)	ND (310)	ND (340)	ND (350)
Aroclor-1254	ug/kg	10,000	8.9 J	49 J	40 J	15 J	92 J
Aroclor-1260	ug/kg	10,000	ND (340)	ND (330)	ND (310)	ND (340)	ND (350)

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

Notes:

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

bgs - below ground surface.

pg/g - picograms per gram.

ug/kg - micrograms per kilogram.

PCBs - Polychlorinated Biphenyls

TSCA - Maximum concentration of PCBs as defined in the U.S. EPA's Toxic Substance Control Act Part 261 Regulation (using the Toxicity Characteristic Leaching Procedure)

J - Estimated result. Result is less than the reporting limit.

JA - The analyte was positively identified, but the quantitation is an estimate.

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

CON - Confirmation analysis.

E - Estimated result. Result concentration exceeds the calibration range.

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

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

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

<i>Sample ID</i>	<i>Collection Date (mm/dd/yy)</i>	<i>Sample Location</i>	<i>Sample Depth</i>	<i>LNAPL Soil Test Requirements</i>	
				<i>Pass</i>	<i>Fail</i>
LPL-13151-060206-KK-165	6/2/2006	Excavation Area No.8	~18 feet bgs	X	
LPL-13151-060206-KK-166	6/2/2006	Excavation Area No.8	~14-16 feet bgs	X	
LPL-13151-060206-KK-167	6/2/2006	Excavation Area No.8	~18 feet bgs	X	
LPL-13151-060206-KK-168	6/2/2006	Excavation Area No.8	~14-16 feet bgs	X	
LPL-13151-060206-KK-169	6/2/2006	Excavation Area No.8	~18 feet bgs	X	
LPL-13151-060406-KK-170	6/4/2006	Excavation Area No.8	~18 feet bgs	X	
LPL-13151-060406-KK-171	6/4/2006	Excavation Area No.8	~14-16 feet bgs	X	
LPL-13151-060406-KK-172	6/4/2006	Excavation Area No.8	~14-16 feet bgs	X	
LPL-13151-060406-KK-173	6/4/2006	Excavation Area No.8	~14-16 feet bgs	X	

Notes:

bgs - below ground surface.

TABLE 6

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

<i>Sample ID</i>	<i>Collection Date (mm/dd/yy)</i>	<i>Sample Location</i>	<i>Discharge Permit Requirements</i>	
			<i>Pass</i>	<i>Fail</i>
W-37326-060106-KK-049	06/01/06	Tank #259944	X	
W-37326-060106-KK-050	06/01/06	Tank #255609	X	
W-37326-060506-KK-051	06/05/06	Tank #255609	X	
W-37326-060506-KK-052	06/05/06	Tank #259944	X	
W-37326-060806-KK-053	06/08/06	Tank #259944	X	
W-37326-061306-KK-054	06/13/06	Tank #255609	X	
W-37326-061306-KK-055	06/13/06	POND WATER	X	
W-37326-062106-KK-056	06/21/06	Tank #255609	X	
W-37326-062106-KK-057	06/21/06	Tank #259944	X	
W-37326-062606-KK-058	06/26/06	Tank #255609	X	
W-37326-062606-KK-059	06/26/06	Tank #259944	X	



**CONESTOGA-ROVERS
& ASSOCIATES**

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www.CRAworld.com

August 10, 2006

Reference No. 13151-10

Mr. Mazin Enwiya
United States Environmental Protection Agency
Region 5
77 West Jackson Boulevard (SR-6J)
Chicago, IL 60604-3507

Dear Mr. Enwiya:

Re: Monthly Progress Report No. 45
Remedial Design/Remedial Action UAO
Former Rockwell International Corporation Site
Allegan, Michigan

On behalf of ArvinMeritor, Inc. (ArvinMeritor), and in accordance with Section XI, Paragraph 67 of the Unilateral Administrative Order (UAO) for the Former Rockwell International Site (Site) effective October 30, 2002, Conestoga-Rovers & Associates (CRA) has prepared the following progress report for the period of July 1, 2006 through July 31, 2006. Pursuant to Section XI, Paragraph 67 of the Administrative Order, this report is due at the United States Environmental Protection Agency (U.S. EPA) on August 10, 2006.

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

During this reporting period, the following activities were undertaken:

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



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

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

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

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



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

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

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

3. Actions Planned for the Next 90-Days

The following activities are anticipated for the next 90 days:

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



**CONESTOGA-ROVERS
& ASSOCIATES**

August 10, 2006

4

Reference No. 13151-10

4. On-Going Considerations Related to the Administrative Order

Although access was granted by the City of Allegan to implement the RA, restrictive covenant agreements with the City continue to remain unresolved. Conference calls with counsel for the City of Allegan and U.S. EPA Assistant Regional Counsel, Kathleen Schnieders, resulted in the conclusion that the restrictive covenant requirement would be deferred at this time.

We trust this progress report provides you with the information required to assess the status of this project. Should you have any questions on the above, please do not hesitate to contact us.

Yours truly,

CONESTOGA-ROVERS & ASSOCIATES

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

Gregory A. Carli, P. E.

JP/jp/20

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

TABLE 1

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

Sample ID:	S-13151-071006-KK-353	S-13151-071006-KK-354	S-13151-071006-KK-355	S-13151-071006-KK-356	S-13151-071006-KK-357
Date Sampled:	7/10/06	7/10/06	7/10/06	7/10/06	7/10/06
Sample Location:	Excavation Area 5- Wall 1	Excavation Area 5- Floor 1	Excavation Area 5-Wall 2	Excavation Area 5- Floor 2	Excavation Area 5-Wall 1
Sample Depth (feet bgs)	18	19	18	19	18

Selected Parameters

	Soil Cleanup Criteria							
	0 - 2 feet bgs ⁽¹⁾	> 2 feet bgs ⁽²⁾						
<i>Polychlorinated Biphenyls</i>								
Aroclor-1016	ug/kg	1,000	10,000	ND(7100)	ND(350)	ND(450)	ND(360)	ND(360)
Aroclor-1221	ug/kg	1,000	10,000	ND(7100)	ND(350)	ND(450)	ND(360)	ND(360)
Aroclor-1232	ug/kg	1,000	10,000	ND(7100)	ND(350)	ND(450)	ND(360)	ND(360)
Aroclor-1242	ug/kg	1,000	10,000	ND(7100)	ND(350)	ND(450)	ND(360)	ND(360)
Aroclor-1248	ug/kg	1,000	10,000	ND(7100)	ND(350)	ND(450)	ND(360)	ND(360)
Aroclor-1254	ug/kg	1,000	10,000	11000	13J	3500	180J	200J
Aroclor-1260	ug/kg	1,000	10,000	ND(7100)	ND(350)	ND(450)	ND(360)	ND(360)

TABLE 1

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

Sample ID:	S-13151-071006-KK-358	S-13151-071006-KK-359	S-13151-071306-KK-360	S-13151-072106-KK-362
Date Sampled:	7/10/06	7/10/06	7/13/2006	7/21/2006
Sample Location:	Excavation Area 5-Floor 3	Excavation Area 5-Wall 4	Excavation Area 5-Wall 1	Excavation Area 5 Additional Excavation
Sample Depth (feet bgs)	19	18	18	

Selected Parameters

	Soil Cleanup Criteria						
	0 - 2 feet bgs ⁽¹⁾	> 2 feet bgs ⁽²⁾					
<i>Polychlorinated Biphenyls</i>							
Aroclor-1016	ug/kg	1,000	10,000	ND(340)	ND(390)	ND(6900)	ND(450)
Aroclor-1221	ug/kg	1,000	10,000	ND(340)	ND(390)	ND(6900)	ND(450)
Aroclor-1232	ug/kg	1,000	10,000	ND(340)	ND(390)	ND(6900)	ND(450)
Aroclor-1242	ug/kg	1,000	10,000	ND(340)	ND(390)	ND(6900)	ND(450)
Aroclor-1248	ug/kg	1,000	10,000	ND(340)	ND(390)	ND(6900)	ND(450)
Aroclor-1254	ug/kg	1,000	10,000	28J	ND(390)	8600	ND(450)
Aroclor-1260	ug/kg	1,000	10,000	ND(340)	ND(390)	ND(6900)	ND(450)

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

Notes:

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

bgs - below ground surface.

mg/kg - micrograms per gram.

mg/kg - milligrams per kilogram.

pg/g - picograms per gram.

ug/kg - micrograms per kilogram

J - Method blank contamination.

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

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

E - Matrix Interference.

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

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

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

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

CON - Confirmation analysis

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

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

Notes:

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

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

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

PCBs - Polychlorinated Biphenyls

SVOCs - Semivolatile Organic Compounds

VOCs - Volatile Organic Compounds

-- Parameter not analyzed

NC - no criteria

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

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

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

Notes:

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

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

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

PCBs - Polychlorinated Biphenyls

SVOCs - Semivolatile Organic Compounds

VOCs - Volatile Organic Compounds

-- Parameter not analyzed

NC - no criteria

J - Estimated result. Result is less than RL.

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

TABLE 3

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

Sample ID: S-13151-062906-KK-348 S-13151-062906-KK-349 S-13151-062906-KK-350 S-13151-063006-KK-351 S-13151-070506-KK-352
Date Sampled: 6/29/2006 6/29/2006 6/29/2006 6/30/2006 7/5/2006
Sample Location: Excavation Area 5- Floor Excavation Area 5- Floor Excavation Area 5- Floor Excavation Area 5- Floor Excavation Area 5- Floor
Sample Depth (feet bgs) ~15' bgs ~15' bgs ~15' bgs ~15' bgs ~15' bgs

Selected Parameters

Soil Cleanup Criteria
0 - 2 feet bgs ⁽¹⁾ > 2 feet bgs ⁽²⁾

Dioxin Furans

2,3,7,8-Tetrachlorodibenzo-p-dioxin	pg/g	-	-	ND(4.0)	ND(8.6)	ND(4.7)	ND(6.4)	ND(5.1)
Total Tetrachlorodibenzo-p-dioxin	pg/g	-	-	ND(4.0)	ND(8.6)	ND(4.7)	ND(6.4)	ND(5.1)
1,2,3,7,8-Pentachlorodibenzofuran	pg/g	-	-	ND(8.5)	ND(9.7)	ND(8.9)	ND(10)	ND(8.7)
Total Pentachlorodibenzofuran	pg/g	-	-	ND(8.5)	ND(9.7)	ND(8.9)	ND(10)	ND(8.7)
1,2,3,4,7,8-Hexachlorodibenzo-p-dioxin	pg/g	-	-	ND(6.5)	ND(11)	ND(6.5)	ND(10)	ND(7.4)
1,2,3,6,7,8-Hexachlorodibenzo-p-dioxin	pg/g	-	-	ND(11)	ND(9.4)	ND(5.8)	ND(9.0)	ND(6.6)
1,2,3,7,8,9-Hexachlorodibenzo-p-dioxin	pg/g	-	-	ND(5.7)	ND(9.3)	ND(5.7)	ND(8.9)	ND(6.5)
Total Hexachlorodibenzo-p-dioxin	pg/g	-	-	ND(39)	ND(11)	ND(6.5)	ND(30)	ND(29)
1,2,3,4,6,7,8-Heptachlorodibenzo-p-dioxin	pg/g	-	-	ND(23)	ND(12)	ND(9.1)	ND(35)	ND(32)
Total Heptachlorodibenzo-p-dioxin	pg/g	-	-	ND(29)	ND(15)	ND(11)	ND(35)	36
1,2,3,4,6,7,8,9-Octachlorodibenzo-p-dioxin	pg/g	-	-	97 J B	ND(45)	85 J B	100 J B	87
2,3,7,8-Tetrachlorodibenzofuran	pg/g	-	-	ND(5.0)	ND(8.0)	ND(4.6)	ND(7.5)	ND(6.5)
Total Tetrachlorodibenzofuran	pg/g	-	-	ND(5.0)	ND(8.0)	ND(4.6)	ND(7.5)	ND(13)
2,3,4,7,8-Pentachlorodibenzofuran	pg/g	-	-	ND(4.9)	ND(6.6)	ND(4.6)	ND(5.5)	ND(5.0)
1,2,3,7,8-Pentachlorodibenzo-p-dioxin	pg/g	-	-	ND(5.1)	ND(6.9)	ND(4.9)	ND(5.7)	ND(5.2)
Total Pentachlorodibenzo-p-dioxin	pg/g	-	-	ND(5.1)	ND(9.7)	ND(5.6)	ND(11)	ND(24)
1,2,3,4,7,8-Hexachlorodibenzofuran	pg/g	-	-	ND(7.7)	ND(16)	ND(7.1)	ND(14)	ND(16)
1,2,3,6,7,8-Hexachlorodibenzofuran	pg/g	-	-	ND(7.1)	ND(14)	ND(6.5)	ND(13)	ND(19)
2,3,4,6,7,8-Hexachlorodibenzofuran	pg/g	-	-	ND(8.0)	ND(16)	ND(7.3)	ND(14)	ND(26)
1,2,3,7,8,9-Hexachlorodibenzofuran	pg/g	-	-	ND(8.6)	ND(17)	ND(7.9)	ND(15)	ND(18)
Total Hexachlorodibenzofuran	pg/g	-	-	ND(8.6)	120	ND(7.9)	180	870
1,2,3,4,6,7,8-Heptachlorodibenzofuran	pg/g	-	-	ND(12)	430	ND(7.3)	430	1400
1,2,3,4,7,8,9-Heptachlorodibenzofuran	pg/g	-	-	ND(3.2)	ND(5.2)	ND(3.6)	ND(4.8)	ND(5.0)
Total Heptachlorodibenzofuran	pg/g	-	-	ND(16)	640	ND(7.3)	490	2000
1,2,3,4,6,7,8,9-Octachlorodibenzofuran	pg/g	-	-	ND(7.6)	110 J	ND(7.9)	ND(52)	350
TEQ	pg/g	1,000	1,000	0.097	4.41	0.085	4.4	14.437

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

Notes:

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

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

bgs - below ground surface.

mg/kg - micrograms per gram.

mg/kg - milligrams per kilogram.

pg/g - picograms per gram.

ug/kg - micrograms per kilogram

J - Method blank contamination.

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

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

E - Matrix Interference.

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

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

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

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

CON - Confirmation analysis

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

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

Notes:

bgs - below ground surface.

N/A- no data available

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

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



**CONESTOGA-ROVERS
& ASSOCIATES**

261 Martindale Rd., Unit #3, St. Catharines Ontario L2W 1A2
Telephone: (905) 682-0510 Facsimile: (905) 682-8818
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September 11, 2006

Reference No. 13151-10

Mr. Mazin Enwiya
United States Environmental Protection Agency
Region 5
77 West Jackson Boulevard (SR-6J)
Chicago, IL 60604-3507

Dear Mr. Enwiya:

Re: Monthly Progress Report No. 46
Remedial Design/Remedial Action UAO
Former Rockwell International Corporation Site
Allegan, Michigan

On behalf of ArvinMeritor, Inc. (ArvinMeritor), and in accordance with Section XI, Paragraph 67 of the Unilateral Administrative Order (UAO) for the Former Rockwell International Site (Site) effective October 30, 2002, Conestoga-Rovers & Associates (CRA) has prepared the following progress report for the period of August 1, 2006 through August 31, 2006. Pursuant to Section XI, Paragraph 67 of the Administrative Order, this report is due at the United States Environmental Protection Agency (U.S. EPA) on September 11, 2006.

1. Activities Taken to Comply with the Administrative Order

During this reporting period, the following activities were undertaken:

- On August 2, 2006, treatment of wastewater through the on-site wastewater treatment system was completed. Dismantling of the wastewater system, off-Site disposal of the spent carbon and cleaning and wipe sampling of the fractionation tanks were completed during the reporting period;
- On August 3, 2006, the pre-certification meeting was scheduled at the Site, however due to scheduling conflicts all parties were unable to attend. An unofficial meeting was held while the official meeting was deferred to a later date;
- On August 10, 2006, Monthly Progress Report No. 45 was submitted to the U.S. EPA covering the period of July 1, 2006 through July 31, 2006;
- On August 21, 2006, Taplin Environmental Contracting (Taplin) commenced asbestos containing material (ACM) abatement activities within the office space of the former manufacturing building (FMB);
- On August 28, 2006, the Seeding and Erosion Control Plan submittal prepared by the Remedial Construction Contractor, CRA Services was submitted to the U.S. EPA;



- Miscellaneous RA activities (i.e., manhole abandonment, off-site disposal of stockpiled excavated soil, placement of geotextile and 6-inches of gravel in excavated areas within the FMB concrete slab) were completed during the reporting period;
- Pre-demolition activities (i.e., removal of lights, ballasts, and mercury switches, waste characterization sampling) were conducted in the office space of the former manufacturing building during the reporting period;
- Demobilization of equipment from the Site continued throughout the reporting period; and
- CRA continued final grading and restoration activities that included construction of the swale and forebay outlet throughout the reporting period.

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

On August 2, July 2006, one wastewater sample (W-37326-080206-KK-067) was collected from the on-site water treatment system to determine compliance with the City of Allegan wastewater discharge permit requirements. As shown in Table 1, the sample met the discharge permit requirements.

As well on August 2, 2006, while conducting pre-demolition activities within the FMB office space, a drum labeled "mineral spirits" was encountered. A sample of the liquid (O-13151-080206-KK-036) was collected to determine disposal requirements and submitted for laboratory analyses of TCLP VOCs, TCLP SVOCs, TCLP Metals, PCBs. The sample indicated that the analyzed parameters were not detected above the laboratory detection limit thereby confirming that the sample was non-hazardous. A summary of the preliminary unvalidated sample analytical results is provided in Table 2.

3. Actions Planned for the Next 90-Days

The following activities are anticipated for the next 90 days:

- Complete demolition of the FMB office space;
- Complete Site restoration activities including hydroseeding;
- Demobilization from the Site;
- Preparation of Operation, Maintenance, and Monitoring Report;
- Preparation of Final Construction Report;
- Attendance at re-scheduled Pre-Certification Inspection Meeting; and
- Attendance at Final Pre-Certification Inspection Meeting.



**CONESTOGA-ROVERS
& ASSOCIATES**

September 11, 2006

3

Reference No. 13151-10

4. On-Going Considerations Related to the Administrative Order

Although access was granted by the City of Allegan to implement the RA, restrictive covenant agreements with the City continue to remain unresolved. Conference calls with counsel for the City of Allegan and U.S. EPA Assistant Regional Counsel, Kathleen Schnieders, resulted in the conclusion that the restrictive covenant requirement would be deferred at this time.

We trust this progress report provides you with the information required to assess the status of this project. Should you have any questions on the above, please do not hesitate to contact us.

Yours truly,

CONESTOGA-ROVERS & ASSOCIATES

Gregory A. Carli, P. E.

JP/jp/22

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

TABLE 1**SUMMARY OF WASTE WATER ANALYTICAL RESULTS
FORMER ROCKWELL INTERNATIONAL CORPORATION
ALLEGAN, MICHIGAN**

<i>Sample ID</i>	<i>Collection Date (mm/dd/yy)</i>	<i>Sample Location</i>	<i>Discharge Permit Requirements</i>	
			<i>Pass</i>	<i>Fail</i>
W-37326-080206-KK-069	8/2/2006	Tank #255609	X	-

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

Sample ID: O-13151-080206-KK-036
Date Sampled: 8/2/2006
Sample Location: Drum labeled "mineral spirits"

Parameter	Units	TSCA Criteria	TCLP Criteria	
PCBs				
PCBs (total)	ug/kg	50000	NC	ND(360)
Aroclor 1016	ug/kg	50000	NC	ND(360)
Aroclor 1221	ug/kg	50000	NC	ND(360)
Aroclor 1232	ug/kg	50000	NC	ND(360)
Aroclor 1242	ug/kg	50000	NC	ND(360)
Aroclor 1248	ug/kg	50000	NC	ND(360)
Aroclor 1254	ug/kg	50000	NC	ND(360)
Aroclor 1260	ug/kg	50000	NC	ND(360)
TCLP VOCs				
Benzene	mg/L	NC	0.5	ND(0.025)
Carbon Tetrachloride	mg/L	NC	0.5	ND(0.025)
Chlorobenzene	mg/L	NC	100.0	ND(0.025)
Chloroform	mg/L	NC	6.0	ND(0.025)
1,2-Dichloroethane	mg/L	NC	0.5	ND(0.025)
1,1-Dichloroethylene	mg/L	NC	0.7	ND(0.070)
Methyl ethyl ketone	mg/L	NC	200.0	ND(0.25)
Tetrachloroethylene	mg/L	NC	0.7	ND(0.070)
Trichlorethylene	mg/L	NC	0.5	ND(0.050)
Vinyl Chloride	mg/L	NC	0.2	ND(0.025)

Notes:

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

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

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

PCBs - Polychlorinated Biphenyls

SVOCs - Semivolatile Organic Compounds

VOCs - Volatile Organic Compounds

-- Parameter not analyzed

NC - no criteria

1.00

 - Parameter exceeds applicable TSCA criteria.

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

Sample ID: O-13151-080206-KK-036
Date Sampled: 8/2/2006
Sample Location: Drum labeled "mineral spirits"

Parameter	Units	TSCA Criteria	TCLP Criteria	
TCLP SVOCs				
o-Cresol	mg/L	NC	200.0	ND(0.004)
m-Cresol & p-Cresol	mg/L	NC	200.0	ND(0.04)
1,4-Dichlorobenzene	mg/L	NC	7.5	ND(0.004)
2,4-Dinitrotoluene	mg/L	NC	0.13	ND(0.02)
Hexachlorobenzene	mg/L	NC	0.13	ND(0.02)
Hexachlorobutadiene	mg/L	NC	0.5	ND(0.02)
Hexachloroethane	mg/L	NC	3.0	ND(0.02)
Nitrobenzene	mg/L	NC	2.0	ND(0.004)
Pentachlorophenol	mg/L	NC	100.0	ND(0.04)
Pyridine	mg/L	NC	5.0	ND(0.02)
2,4,5-Trichlorophenol	mg/L	NC	400.0	ND(0.02)
2,4,6-Trichlorophenol	mg/L	NC	2.0	ND(0.02)
TCLP Metals				
Arsenic	mg/L	NC	5.0	ND(0.5)
Barium	mg/L	NC	100.0	ND(10)
Cadmium	mg/L	NC	1.0	ND(0.1)
Chromium	mg/L	NC	5.0	ND(0.5)
Lead	mg/L	NC	5.0	ND(0.5)
Selenium	mg/L	NC	1.0	ND(0.25)
Silver	mg/L	NC	5.0	ND(0.5)
Mercury	mg/L	NC	0.2	ND(0.002)

Notes:

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

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

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

PCBs - Polychlorinated Biphenyls

SVOCs - Semivolatile Organic Compounds

VOCs - Volatile Organic Compounds

-- Parameter not analyzed

NC - no criteria

J - Estimated result. Result is less than RL.

1.00 - Parameter exceeds applicable TSCA criteria.



**CONESTOGA-ROVERS
& ASSOCIATES**

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

October 12, 2006

Reference No. 13151-10

Mr. Mazin Enwiya
United States Environmental Protection Agency
Region 5
77 West Jackson Boulevard (SR-6J)
Chicago, IL 60604-3507

Dear Mr. Enwiya:

Re: Monthly Progress Report No. 47
Remedial Design/Remedial Action UAO
Former Rockwell International Corporation Site
Allegan, Michigan

On behalf of ArvinMeritor, Inc. (ArvinMeritor), and in accordance with Section XI, Paragraph 67 of the Unilateral Administrative Order (UAO) for the Former Rockwell International Site (Site) effective October 30, 2002, Conestoga-Rovers & Associates (CRA) has prepared the following progress report for the period of September 1, 2006 through September 30, 2006. Pursuant to Section XI, Paragraph 67 of the Administrative Order, this report is due at the United States Environmental Protection Agency (U.S. EPA) on October 10, 2006.

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

During this reporting period, the following activities were undertaken:

- On September 7, 2006, a conference call was attended by representatives from CRA, U.S. EPA, ArvinMeritor, Michigan Department of Environmental Quality (MDEQ), and Weston Solutions (Weston). RA progress to date and monitoring well placement to facilitate long-term monitoring were discussed;
- On September 11, 2006, Monthly Progress Report No. 46 was submitted to the U.S. EPA covering the period of August 1, 2006 through August 31, 2006;
- Miscellaneous RA activities (i.e., final grading of the Site, hydroseeding) were completed during the reporting period;
- Demolition of the office space of the former Manufacturing Building (FMB) was completed during the reporting period;
- Complete demobilization of equipment from the Site was completed during the reporting period.

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

There were no samples taken or analytical results received during this reporting period.



**CONESTOGA-ROVERS
& ASSOCIATES**

October 12, 2006

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Reference No. 13151-10

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

The following activities are anticipated for the next 90 days:

- Pending disposal facility approval, off-Site removal of FMB office space demolition debris remaining on-Site;
- Preparation of Operation, Maintenance, and Monitoring Report;
- Preparation of Final Construction Report;
- Attendance at re-scheduled Pre-Certification Inspection Meeting; and
- Attendance at Final Pre-Certification Inspection Meeting.

4. **On-Going Considerations Related to the Administrative Order**

Although access was granted by the City of Allegan to implement the RA, restrictive covenant agreements with the City continue to remain unresolved. During the reporting period, representatives from the City of Allegan and ArvinMeritor held discussions regarding post-RA access and restrictive covenant requirements.

We trust this progress report provides you with the information required to assess the status of this project. Should you have any questions on the above, please do not hesitate to contact us.

Yours truly,

CONESTOGA-ROVERS & ASSOCIATES

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

Gregory A. Carli, P. E.

JP/jp/23

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