

SITE REMEDIATION REPORT

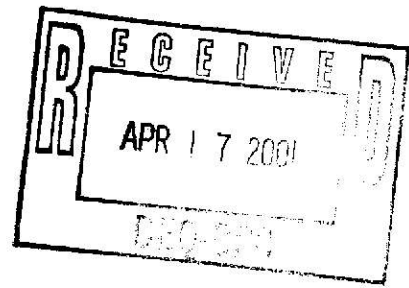
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Newman Duplex Property
408 and 410 Lee Avenue
Crystal Springs, Mississippi

Prepared for

BorgWarner Inc.

April 2001



SITE REMEDIATION REPORT

**Newman Duplex Property
408 and 410 Lee Avenue
Crystal Springs, Mississippi**

Prepared for

BorgWarner Inc.

Prepared by

**MARTIN&SLAGLE GeoEnvironmental Associates, LLC
PO Box 1023
Black Mountain, North Carolina**

April 2001

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SITE REMEDIATION REPORT

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408 and 410 Lee Avenue
Crystal Springs, Mississippi**

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SECTION 1.0 EXECUTIVE SUMMARY

The soil on the Newman Duplex property, located at 408 and 410 Lee Avenue, Crystal Springs, Mississippi, and consisting of approximately 0.1 acres, was found to contain concentrations of polychlorinated biphenyls (PCBs) during sampling events conducted in August and September 2000. The concentrations, in some areas of the property, exceeded the standard of 1.0 mg/kg established by Mississippi Department of Environmental Quality for PCBs in soils on residential properties.

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

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

An area approximately 8.5 feet by 27.5 feet was excavated to an average depth of 2 feet bgs. Excavation continued until on-site laboratory analytical results confirmed that all soil containing concentrations of PCBs exceeding the residential cleanup thresholds was removed. The analytical results indicate that all soil containing 1.0 mg/kg or greater were removed from the Newman Duplex property. After confirmation results indicated that the remediation objective had been met, the excavation was backfilled with analytically confirmed clean soil. The surface of the remediation area was covered with fresh sod.

On November 30, 2000 the Newman Duplex property was effectively remediated by removal of soil containing PCB concentrations in excess of 1.0 mg/kg in accordance with

the residential property cleanup thresholds. No further action is warranted at the Newman Duplex property.

2.0 INTRODUCTION

The soil on the Newman Duplex property was found to contain concentrations of polychlorinated biphenyls (PCBs) during sampling events conducted in August and September 2000. The concentrations, in some areas of the property, exceeded the standard of 1 mg/kg established by Mississippi Department of Environmental Quality for PCBs in soils on residential properties. The soil containing concentrations of PCBs in excess of 1 mg/kg was remediated by removal and replaced with clean soil. This report describes the remediation process and results of soil analytical results. The report also includes maps showing sample locations and the areas of remediation.

The Newman Duplex property is located at 408 and 410 Lee Avenue, Crystal Springs, Mississippi. This property is located south of the Kuhlman Electric Corporation (KEC) property across Lee Avenue (Figure 1). The site includes a single story frame duplex with two concrete driveways divided by a small grassy area in front of the building (Figure 2).

2.1 Background

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

During routine construction activities at KEC's plant in Crystal Springs, Mississippi, construction personnel encountered soil that had been impacted by unknown chemicals. KEC reported that construction activities were immediately halted, and two soil samples

were collected by representatives of KEC and sent to an independent laboratory for analysis. KEC reported the detection of the PCB, Aroclor 1268, in the stained soils, along with various chlorinated benzenes.

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

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

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

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

2.2 Site Description

The Newman property consists of approximately 0.1 acres located south of the KEC property. The Newman property is located across Lee Avenue from the main employee parking lot entrance south of the KEC facility. The Newman property is generally flat, sloping gently to the east. As expected, PCB concentrations exceeding the residential

cleanup thresholds were found only in the grassy area adjacent to Lee Avenue and closest to the KEC facility.

2.3 Investigative Activities

The initial investigation of the Newman Duplex occurred on August 24, 2000. Eight soil samples were collected in four locations from depths of .5 feet and 4 feet below ground surface (bgs) at each location. Samples were collected using a direct-push soil sampler. A detailed description of sampling techniques used during this investigation is included in the *Preliminary Site Characterization Report* (Ogden 2000).

Samples were analyzed by the on site laboratory for PCBs using a modified EPA Method 8080. Ten percent of the samples were split for confirmation analysis by the fixed-base laboratory, Paradigm Analytical Labs (Paradigm) located in Wilmington, North Carolina. All sampling as performed in accordance with EPA Region IV Environmental Investigation Standard Operating Procedures and Quality Assurance Manual (EISQAM).

The results of laboratory analysis of the soil samples confirmed the presence of PCBs in one shallow soil sample (DP 492) above the residential cleanup threshold. Remedial activities were conducted and completed on November 30, 2000. Impacted soil was excavated and disposed of in the BFI "Little Dixie" Subtitle D landfill in accordance with all applicable state and federal regulations. The Little Dixie landfill is located in Ridgeland, Mississippi. Confirmatory soil samples were collected following excavation to confirm that impacted soil had been removed. Excavation continued until on site laboratory analytical results confirmed that all soil containing concentrations of PCBs exceeding the residential cleanup thresholds was removed.

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

SECTION 3.0 SAMPLING PROGRAM – LOCATION AND RATIONALE

Remediation of the Newman Duplex, on Lee Avenue, began on November 30, 2000. Remediation of this property involved excavation and disposal of all soil containing 1.0 mg/kg or greater of PCBs in accordance with MDEQ's established clean-up criteria for residential properties. All soils containing greater than 1 mg/kg of PCBs were profiled and disposed of at the BFI's "Little Dixie", Subtitle "D" Landfill in Madison County, Mississippi after MDEQ and US EPA approvals were obtained.

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

The guidance document provides a procedure for establishing a soil-sampling grid for confirmation that cleanup goals have been met or exceeded. The procedure applies to sites with a surface area less than 10,890 square feet. The procedure involves a biased approach to sampling, i.e. collecting samples from the point of a known release, such as a tank leak or surface spill. The remediation area of the excavation floor is approximately 234 ft². The area of the sidewall surrounding excavation is 144 ft². The guidance defined the minimum number of floor samples for this size of site to be two and the minimum number of sidewall samples to be four.

A total of three floor samples and six sidewall samples were collected following removal of soil to a depth of approximately two feet. All samples were collected in accordance with EPA Region IV EISOPQAM. Sample locations are shown in Figure 2. One duplicate sample was collected for laboratory quality assurance. The analytical results

indicate that all soil containing 1.0 mg/kg or greater were removed from the Newman Duplex property. Table 1 contains analytical results that confirm remediation, and Appendix 1 contains data sheets of all samples collected during the remediation process.

SECTION 4.0 ANALYTICAL PROGRAM

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

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

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

Analytical Methods

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

Paradigm Analytical also used EPA 8082 for quantitation of PCBs.

SECTION 5.0 REMEDIATION AND DISPOSAL

Remediation of the Newman Duplex, on Lee Avenue, began on November 30, 2000. Remediation of this property involved excavation to the property line common with the Kuhlman Electric Corporation's (KEC) plant property and disposal of all soil containing 1.0 milligram per kilogram (mg/kg) or greater of PCBs in accordance with MDEQ's established clean-up criteria for residential properties. All soils containing greater than 1 mg/kg of PCBs were profiled and disposed of at the BFI's "Little Dixie" Subtitle D Landfill in Madison County, Mississippi after MDEQ and US EPA approvals were obtained.

An area approximately 8.5 feet by 27.5 feet was excavated to an average depth of 2 feet bgs. Excavation was accomplished using a track-mounted backhoe. Excavated soil was placed directly into a plastic lined roll-off box and transported to the landfill when full.

Twenty-seven tons of soil were removed from the site in two roll-off boxes. Waste manifests are included in Appendix 2.

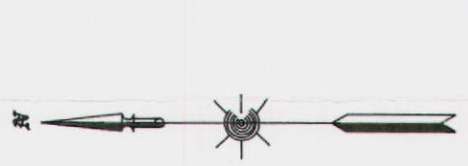
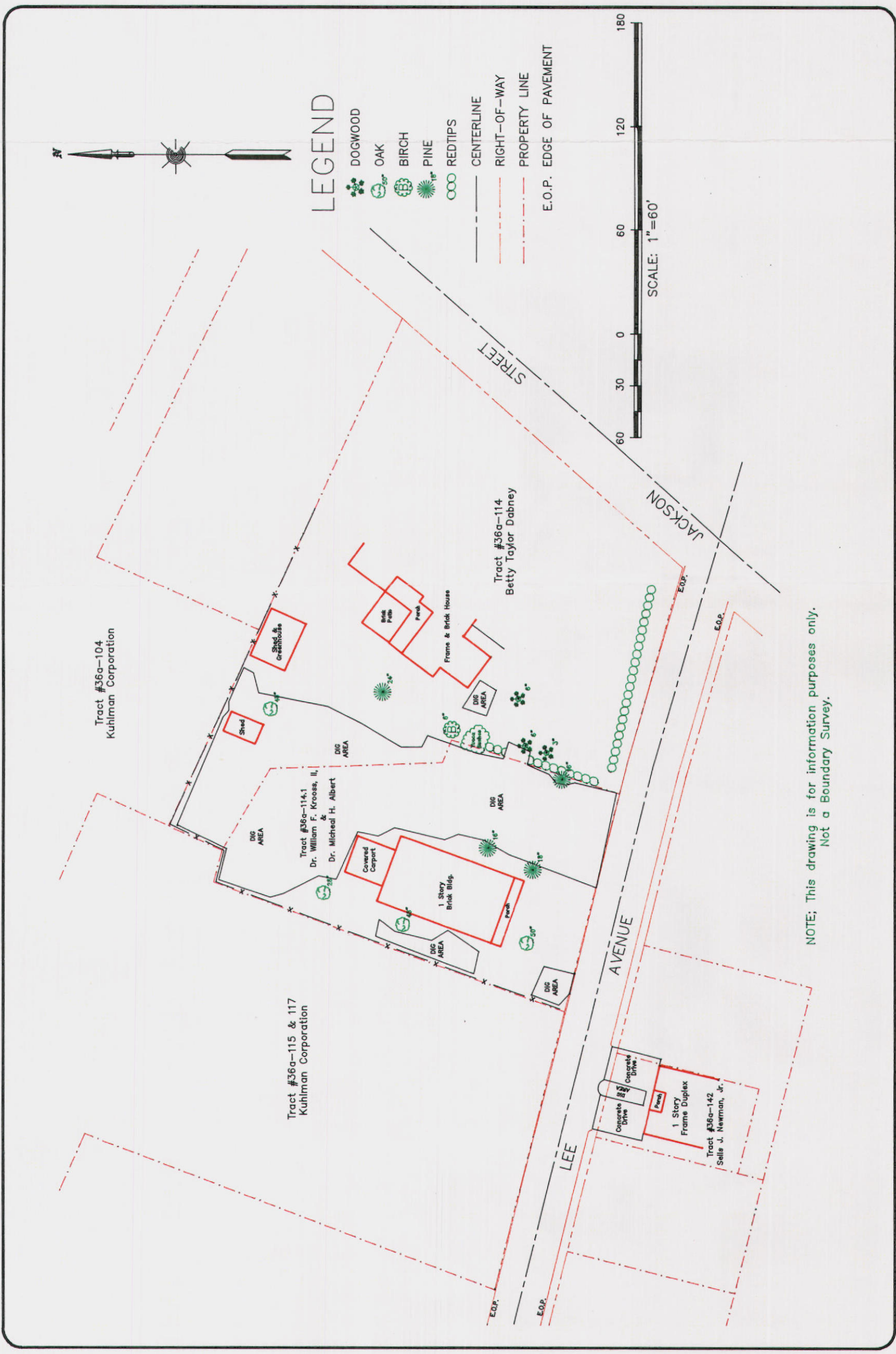
After confirmation results indicated that the remediation objective had been met, the excavation was backfilled with analytically confirmed clean soil. The surface of the remediation area was covered with fresh sod.

SECTION 6.0 SUMMARY AND CONCLUSIONS

On November 30, 2000 the Newman Duplex property was effectively remediated of soil containing PCB concentrations of 1 mg/kg or more in accordance with the residential property cleanup thresholds. Confirmation sampling in the impacted area was performed in accordance with applicable state requirements to demonstrate that the remediation goals were met.

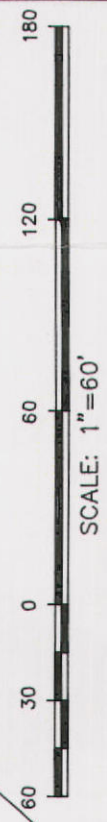
No further action is warranted at the Newman Duplex property.

FIGURE 1	SCALE 1" = 60'	DATE: 4/12/01		DR: RRB	CHK: RLM	REV: 0	PROJECT NO.: BW00-1	SITING REMEDIATION PROPERTY LINE MAP	MAPTECH, INC.	SURVEYED BY:	PREPARED FOR:	BorgWarner Inc.	Environmental Associates, LLC PO Box 1023 Black Mountain NC 28711 828.669.3929 828.669.5289
		DATE: 4/12/01		DR: RRB	CHK: RLM	REV: 0							



LEGEND

- DOGWOOD
- OAK
- BIRCH
- PINE
- REDTIPS
- CENTERLINE
- RIGHT-OF-WAY
- PROPERTY LINE
- E.O.P. EDGE OF PAVEMENT



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

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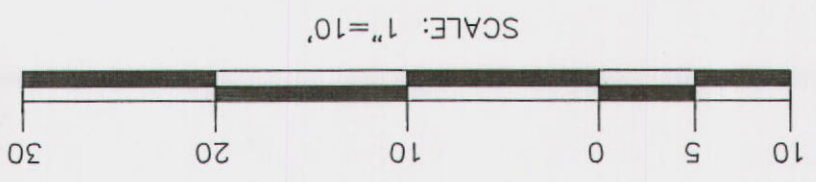
BorgWarner Inc.

MAPTECH, INC.

SITE REMEDIATION
 Newman Duplex Property
 SAMPLE LOCATION MAP
 PROJECT NO.: BW00-1

SCALE
 1"=10'

FIGURE
 2



LEGEND

- CENTERLINE
- RIGHT-OF-WAY
- - - PROPERTY LINE
- NDSS - SAMPLE LOCATION
- ND NEWMAN DUPLEX PROPERTY
- EFS Excavation Floor Sample
- ESS Excavation Sidewall Sample

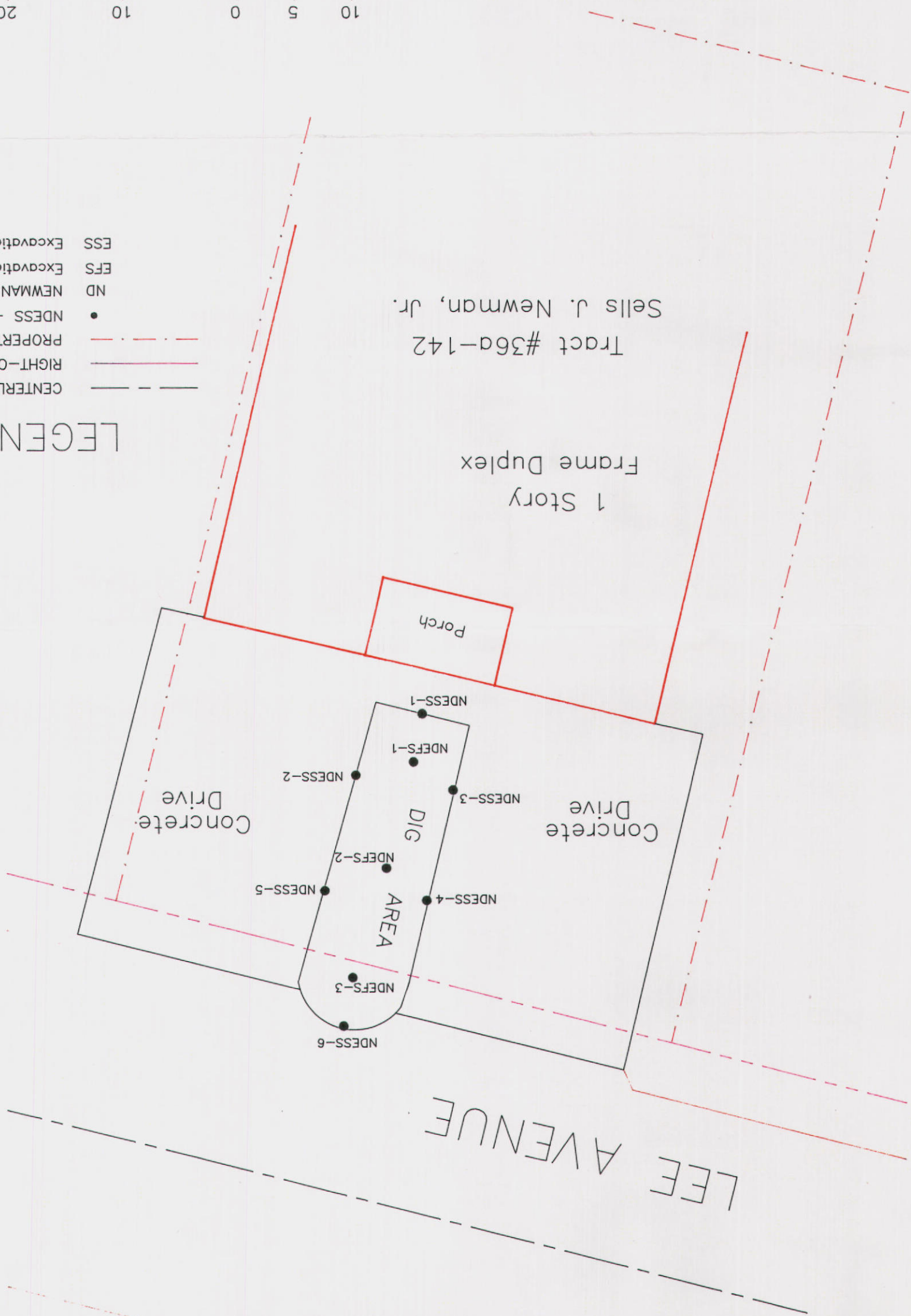


TABLE 1
SUMMARY OF DATA SHOWING CONFIRMATION OF REMEDIATION

				Field Laboratory		Fixed Laboratory	
Field Lab Sample ID	Sample ID	Date Collected	Time Collected	Date Analyzed	Concentration (mg/kg)	Date Analyzed	Concentration (mg/kg)
1795	ND EFS-1	11/30/2001	9:49	11/30/2001	<0.10		
1796	ND EFS-2	11/30/2001	9:50	11/30/2001	<0.10		
1797	ND ESS-1	11/30/2001	9:46	11/30/2001	0.64		
1798	ND ESS-2	11/30/2001	9:47	11/30/2001	0.36		
1799	ND ESS-3	11/30/2001	9:48	11/30/2001	0.58		
1800	ND ESS-4	11/30/2001	9:53	11/30/2001	0.91	12/11/2001	0.22
1801	ND EFS-3	11/30/2001	10:13	11/30/2001	<0.10		
1802	ND ESS-5	11/30/2001	10:12	11/30/2001	0.65		
1803	ND ESS-6	11/30/2001	10:15	11/30/2001	0.15		
1800A	ND ESS-4	11/30/2001	9:53	11/30/2001	0.82		
1800B	ND ESS-4	11/30/2001	9:53	11/30/2001	0.90		

DATA REVIEW
ECCS – MEDICAL CENTER

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

DATA REVIEW
ECCS – DABNEY SMITH PROPERTY

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

DATA REVIEW
ECCS – NEWMAN DUPLEX

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

DATA REVIEW
PARADIGM ANALYTICAL LABS

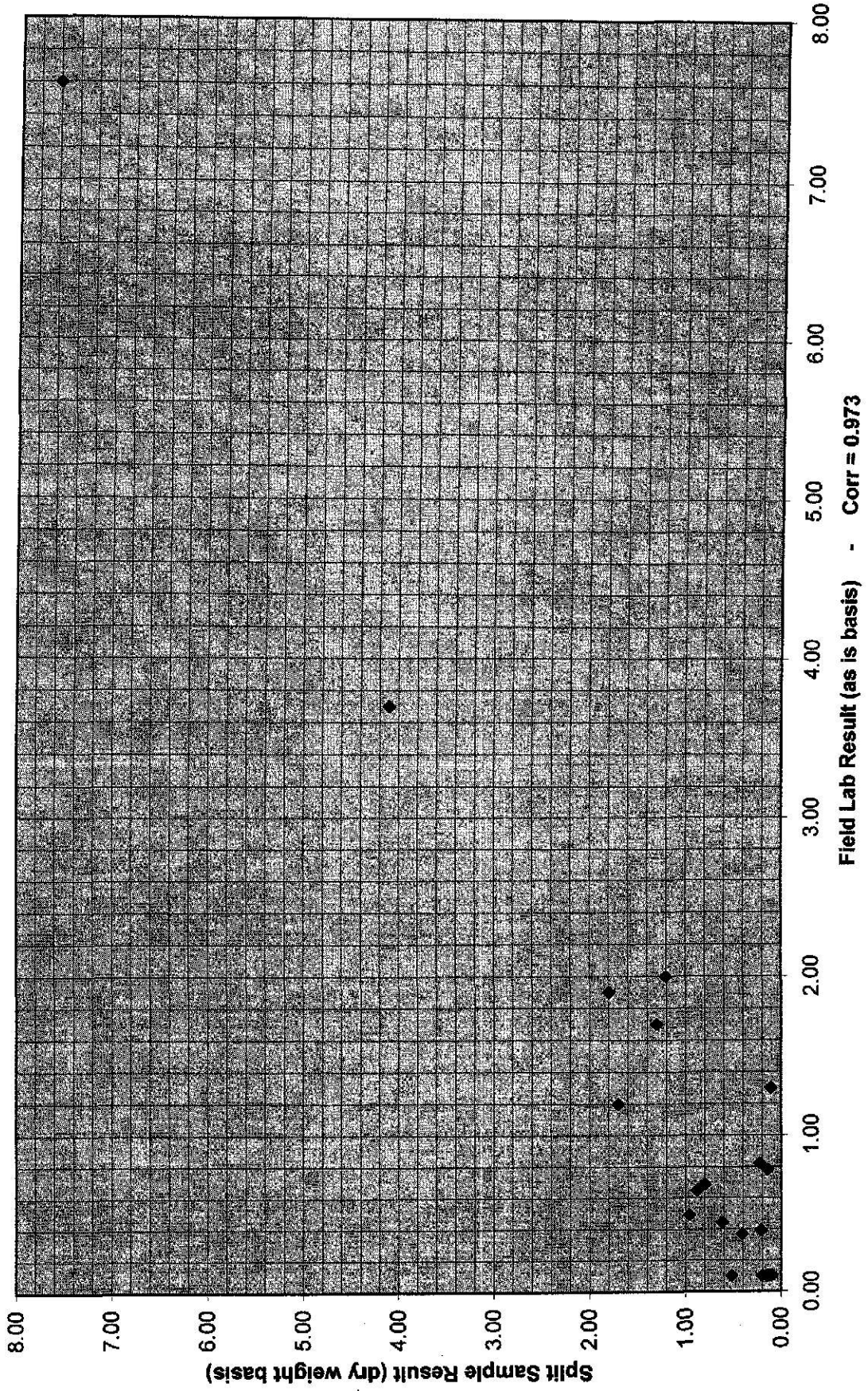
	Acceptable	Unacceptable	Control Limits Met
Holding Times	√		
Completeness	√		
LCS	√		Yes
MS/MSD	√		Yes
MS/MSD RPD	√		Yes
Blind Duplicates	√		Yes

COMPARISON OF FIXED AND FIELD LABORATORY SPLIT SAMPLE DATA

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

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

Comparison of Split Sample Results



FIELD LABORATORY BLIND DUPLICATE SAMPLE DATA

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

E = VALUE EXCEEDS CALIBRATION RANGE.

Reported in mg/kg

FIXED LABORATORY BLIND DUPLICATE SAMPLE DATA

SAMPLE ID		PCBs (Aroclor 1260)		
		FIXED LAB		
Sample	Duplicate	Sample	Duplicate	RPD
MCESS-62 .5	Dupe 10/25/00	<0.10	<.11	0.00%
DSPA7	Dupe 10/28/00	0.55	0.38	36.56%
MCESS-113	Dupe 10/29/00	0.16	0.18	11.76%
MCESS118	Dupe 10/31/00	1.20	1.00	18.18%
DSESS-32	Dupe 11/01/00	<0.32	<0.33	0.00%
DSESS-38	Dupe 11/02/00	7.60	9.40	21.18%
MCEFS-61	Dupe 11/03/00	<0.99	<0.96	0.00%
MCEFS-72	Dupe 11/04/00	<0.10	<0.081	0.00%
MCESS-147	Dupe 11/07/00	0.52	0.42	21.28%
DSESS-53	Dupe 11/27/00	NA	NA	NA
MCESS-155	Dupe 11/28/00	NA	NA	NA

Reported in mg/kg


December 11, 2000

Robert Martin
Martin & Slagle, LLC
P.O. Box 1023
Black Mountain, NC 28711

Dear Mr. Martin,

Enclosed is the final Technical Memorandum for work recently completed at the former Borg Warner and current Kuhlman Electric facility at 408 & 410 Lee Street in Crystal Springs, Mississippi. If you have any questions concerning this information, please give me a call.

Sincerely,



Richard Johnson

Enclosure

Environmental Chemistry Consulting Services, Inc.

2525 Advance Road • Madison, WI 53718 • Phone (608) 221-8700 • FAX (608) 221-4889

Technical Memorandum

408 & 410 Lee Street

Crystal Springs, Mississippi

TECHNICAL MEMORANDUM

December 11, 2000

To: Robert Martin
Martin & Slagle, LLC

From: Richard Johnson *RJ*
ECCS, Inc.

Re: Field Analytical Methods – QC Summary
Remediation at 408 & 410 Lee Street
Crystal Springs, Mississippi

INTRODUCTION

This Technical Memorandum provides documentation of the field analytical test methods used to analyze soil samples collected during a remediation episode, November 30, 2000 around the former Borg Warner and current Kuhlman Electric facility at 408 & 410 Lee Street in Crystal Springs, Mississippi. Soil samples were analyzed for polychlorinated biphenyls (PCBs) by gas chromatography (GC) in accordance with ECCS's Polychlorinated Biphenyl (PCB) Mini Extraction Screening Procedure. A summary of test results for the episode is provided in Table 1.

The PCB mini-extraction procedure is based on the existing EPA SW846 method 8082/8141. The procedure incorporates all the quality control rigors of the full 8082 method including quantification based on 6-point calibration with continuing calibration verification, surrogate method performance monitoring, method blanks, laboratory control samples (LCS), and matrix spike/matrix spike (MS/MSD) duplicate samples. As such, you should consider these test results as comparable to what you would get from a fixed-based laboratory using the more-widely accepted extraction procedure, with the only difference being somewhat lower reporting limits in the fixed-based laboratory.

The primary project objective of the sampling and testing episode was to delineate the PCB contamination around the site using the accelerated site characterization approach. The mobile laboratory was required to provide data as quickly as possible to keep the accelerated site investigation process on track while trying to maintain a goal of Level Three data quality.

Environmental Chemistry Consulting Services, Inc.

2525 Advance Road • Madison, WI 53718 • Phone (608) 221-8700 • FAX (608) 221-4889

CASE NARRATIVE

During the one-day episode, 9 samples were collected and analyzed. To maintain rapid turnaround and to meet the project objective, two GCs were operated on a nearly continuous basis.

Quality control including proper calibration, continuing calibration verification, surrogates, method blanks, laboratory control samples and matrix spike/matrix spike duplicate samples was performed at the method-specified intervals. Overall quality of the data is very good. The following quality related issues should be noted:

1. All blanks, LCS's, MS and MSD's were within acceptable limits.
2. All surrogate recoveries for reported data were within acceptable limits.

METHOD SUMMARY

This method employs a mini-extraction procedure and gas chromatography analysis for the detection of PCBs. Reporting limits are provided in the results Tables. Four grams of sample are dried with anhydrous sodium sulfate and extracted with eight mLs of 80/20 iso-octane/acetone. The extract is then analyzed by Gas Chromatography-Electron Capture Detector (GC-ECD).

Procedure

1. Standards Preparation - Primary standards are prepared from a solution purchased from various vendors at Certified concentrations. Stock standards are prepared in suitable solvents and stored in a freezer when not in use. Secondary standards are prepared in 80/20 iso-octane/acetone and stored in a freezer when not in use. Standard curve mixes for this project were prepared at six concentrations: PCBs - 0.05, 0.10, 0.20, 0.50, 1.0 and 2.0 ug/mL
2. Sample Preparation - SOILS: Each sample or quality control sample is prepared in identical fashion. Approximately four grams of silica sand (blanks and control spikes) or sample is transferred into a clean scintillation vial. Four grams of anhydrous sodium sulfate are added to the vial and mixed well. Extra sodium sulfate is added when necessary to assure the sample is dried. A surrogate, spike compound mix (if necessary) and eight mLs of 80/20 iso-octane/ acetone are added to the vial. The vial is shaken for 30 seconds, allowed to settle for 2 minutes, shaken again for 30 seconds, and allowed to settle for 10 minutes. If sample is colored the extract is cleaned-up using concentrated sulfuric acid. An aliquot of the extract is transferred to an autosampler vial.
3. GC-ECD Analysis - A sample aliquot is injected into an HP5890 GC with an ECD

linked to an HP ChemStation for data processing. PCBs were identified by matching retention times of standards to the same retention time in the sample. Regression analysis was performed on each of the selected peak's height verses concentration of the standard using a LN/LN transformed linear regression. For PCBs nine peaks were selected for quantification. The ug/mL value for each peak was added together and divided by the number of peaks selected to obtain the total PCB ug/mL result. If an interference occurred at any of the peaks, these peaks were not included in the total, and the divisor was reduced accordingly.

4. Quality Control - Quality control consisted of the following items:
 - Continuing calibration standards analyzed every ten samples or less and at the end of a run.
 - Blank and LCS samples analyzed every twenty sample or less with a minimum of one per day.
 - MS/MSD samples analyzed every twenty samples or less with a minimum of one per day.
 - Information is documented in logbook 45 and daily run sheets.
 - Blind duplicate samples were collected in the field and analyzed by the mobile laboratory. Blind duplicate sample results are summarized in Table 2.

5. Instrument Conditions - Two HP5890 gas chromatographs were equipped with RTX-35 capillary columns. Each system had a Leap Technologies A200S auto-sampler and both were linked to an HP ChemStation for data handling.

TABLE 1

SOIL SAMPLE RESULTS

408 AND 410 LEE STREET
CRYSTAL SPRINGS, MS
MG/KG

Target Analyte	Sample #	ND/EFS-1	ND/EFS-2	ND/ESS-1	ND/ESS-2	ND/ESS-3	ND/ESS-4	ND/EFS-3	ND/ESS-5	ND/ESS-6	ND/ESS-4	ND/ESS-4
	Lab #	1795	1796	1797	1798	1799	1800	1801	1802	1803	1800A	1800B
PCB as 1260		<0.10	<0.10	0.64	0.36	0.58	0.91	<0.10	0.65	0.15	0.82	0.90
	Collection Date	11/30/00	11/30/00	11/30/00	11/30/00	11/30/00	11/30/00	11/30/00	11/30/00	11/30/00	11/30/00	11/30/00
	Collection Time	9:49	9:50	9:46	9:47	9:48	9:53	10:13	10:12	10:15	9:53	9:53
	Injection Date	11/30/00	11/30/00	11/30/00	11/30/00	11/30/00	11/30/00	11/30/00	11/30/00	11/30/00	11/30/00	11/30/00

PARADIGM ANALYTICAL LABORATORIES, INC.
2627 Northchase Parkway S.E.
Wilmington, North Carolina 28405
(910) 350-1903
Fax (910) 350-1557

Mr. Robert Martin
Martin & Slagle
Box 1023
Black Mountain, NC 28711

January 8, 2001

Report Number: G442-3

Client Project ID: BW001

Dear Mr. Martin,

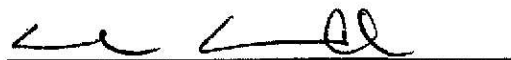
Enclosed are the results of the analytical services performed under the referenced project. Copies of this report and supporting data will be retained in our files for a period of five years in the event they are required for future reference. Any samples submitted to our laboratory will be retained for a maximum of thirty (30) days from the date of this report unless other arrangements are requested.

If there are any questions about the report or the services performed during this project, please call for assistance. We will be happy to answer any questions or concerns which you may have.

Thank you for using Paradigm Analytical Labs for your analytical services. We look forward to working with you again on any additional analytical needs which you may have.

Sincerely,

Paradigm Analytical Laboratories, Inc.



Laboratory Director
Mark Randall

PARADIGM ANALYTICAL LABORATORIES, INC.

Results for PCBs
by EPA 8082

Client Sample ID: NDESS-4
Client Project ID: BW001
Lab Sample ID: 10940
Lab Project ID: G442-3
Matrix: Soil

Date Collected: 11/30/00
Date Received: 12/7/00
Date Analyzed: 12/11/00
Analyzed By: CLP
Dilution: 1

%SOLIDS: 79.1

Compound	Quantitation Limit (ug/KG)	Result (ug/KG)
Aroclor-1016	150	BQL
Aroclor-1221	150	BQL
Aroclor-1232	150	BQL
Aroclor-1242	150	BQL
Aroclor-1248	150	BQL
Aroclor-1254	150	BQL
Aroclor-1260	150	BQL
Aroclor-1262	150	220 BQL

Surrogate Spike Recoveries	Spike Added	Spike Result	Percent Recovered
TCMX	100	72	72

*Sample was quantitated as Aroclor 1260, but appears to contain a mixture of Aroclor 1260 and Aroclor 1262.

Comments:

BQL = Below Quantitation Limit
NA = Not applicable, surrogate diluted out.

Reviewed By: 

PARADIGM ANALYTICAL LABORATORIES, INC.

MS/MSD Results for PCBs
by GC 8082

Client Sample ID: Batch QC
Client Project ID: BW001
Lab Sample ID: SQC 26
Lab Project ID: G442-3
Matrix: Soil

Date Analyzed: 12/21/01
Analyzed By: JPW
Dilution: 20.0

Compound	Sample	MS	%Rec	MSD	%Rec	RPD
Aroclor-1260	7600	7100	89%	6700	84%	6.2

Comments:

BQL = Below Quantitation Limit

Results reported are on-column amounts in ug/L

N.C. Certification #481 S.C. Certification #99029

Reviewed By: 

PARADIGM ANALYTICAL LABORATORIES, INC.
Results for Laboratory Control Spike (LCS)
by GC 8082

Client Sample ID: Batch QC
Client Project ID: BW001
Lab Sample ID: SLCS 26
Lab Project ID: G442-3
Matrix: Soil

Date Analyzed: 12/21/01
Analyzed By: CLP
Dilution: 1.0

Compound	Spiked (ug/KG)	Result (ug/KG)	Limits	
			Lower	Upper
Aroclor 1260	313	254	219	406

Reviewed By: 

PARADIGM ANALYTICAL LABORATORIES, INC.

Results for PCBs
by EPA 8082

Client Sample ID: Method Blank
Client Project ID: BW001
Lab Sample ID: SBLK 112700
Lab Project ID: G442-3
Matrix: Soil

%SOLIDS: 100.0

Date Collected:
Date Received:
Date Analyzed: 11/30/00
Analyzed By: CLP
Dilution: 1

Compound	Quantitation Limit (ug/KG)	Result (ug/KG)
Aroclor-1016	94	BQL
Aroclor-1221	94	BQL
Aroclor-1232	94	BQL
Aroclor-1242	94	BQL
Aroclor-1248	94	BQL
Aroclor-1254	94	BQL
Aroclor-1260	94	BQL
Aroclor-1262	94	BQL

Surrogate Spike Recoveries	Spike Added	Spike Result	Percent Recovered
TCMX	100	73	73

Comments:
BQL = Below Quantitation Limit
NA = Not applicable, surrogate diluted out.

Reviewed By: 



NON-HAZARDOUS SPECIAL WASTE & ASBESTOS MANIFEST

If waste is asbestos waste, complete Sections I, II, III and IV.
If waste is NOT asbestos waste, complete only Sections I, II and III.

No. 655175

Section I GENERATOR (Generator completes all of Section I)

a. Generator Name: Williams Holdings b. Generating Location: Duplex
 c. Address: 101 Williams Dr. Crystal Springs, MS 39059 d. Address: Crystal Springs, MS
 e. Phone No.: _____ f. Phone No.: _____
 If owner of the generating facility differs from the generator, provide:
 g. Owner's Name: _____ h. Owner's Phone No.: _____

i. BFI WASTE CODE:

M	1	7	9	J	T	0	0	4	2
---	---	---	---	---	---	---	---	---	---

 Containers: _____
 j. Description of Waste: oil contaminated 10/1000 k. Quantity:

--	--	--	--	--	--	--	--	--	--

 Units: Y No.:

--	--	--	--	--	--	--	--	--	--

 TYPE: T

- TYPE**
 DM - METAL DRUM
 DP - PLASTIC DRUM
 B - BAG
 BA - 6 MIL. PLASTIC BAG or WRAP
 T - TRUCK
 O - OTHER
- UNITS**
 P - POUNDS
 Y - YARDS
 M³ - CUBIC METERS
 Y³ - CUBIC YARDS
 O - OTHER

GENERATOR'S CERTIFICATION: I hereby certify that the above named material is not a hazardous waste as defined by 40 CFR Part 261 or any applicable state law, has been properly described, classified and packaged, and is in proper condition for transportation according to applicable regulations; AND, if the waste is a treatment residue of a previously restricted hazardous waste subject to the Land Disposal Restrictions, I certify and warrant that the waste has been treated in accordance with the requirements of 40 CFR Part 268 and is no longer a hazardous waste as defined by 40 CFR Part 261.

Alan Thomas Generator Authorized Agent Name
[Signature] Signature
11/30/00 Shipment Date

Section II TRANSPORTER (Generator completes a, b, c, d, e, f, g, h, i, j, k, l, m, n, o, p, q, r, s, t, u, v, w, x, y, z. Transporter completes a, b, c, d, e, f, g, h, i, j, k, l, m, n, o, p, q, r, s, t, u, v, w, x, y, z. Shipper completes a, b, c, d, e, f, g, h, i, j, k, l, m, n, o, p, q, r, s, t, u, v, w, x, y, z.)

TRANSPORTER I
 Name: Super Service
 Address: 101 Williams Dr. Crystal Springs, MS 39059
 Driver Name/Title: Rafael Barretto
 Phone No.: 601-907-7403 PRINT/TYPED
 e. Truck No.: _____
 Vehicle License No./State: A37797 MS
 Acknowledgement of Receipt of Materials:
Rafael Barretto Driver Signature
11/30/00 Shipment Date

TRANSPORTER II
 Name: _____
 Address: _____
 Driver Name/Title: STJ
 Phone No.: _____ PRINT/TYPED
 l. Truck No.: _____
 Vehicle License No./State: _____
 Acknowledgement of Receipt of Materials:
 _____ Driver Signature
 _____ Shipment Date

Section III DESTINATION (Generator completes a, b, c, d, e, f, g, h, i, j, k, l, m, n, o, p, q, r, s, t, u, v, w, x, y, z. Destination Site completes a, b, c, d, e, f, g, h, i, j, k, l, m, n, o, p, q, r, s, t, u, v, w, x, y, z.)

a. Site Name: BFI White River Landfill c. Phone No.: 601-907-7403
 b. Physical Address: 17th W. County Line Rd. Abbeville, MS 39007 d. Mailing Address: STJ
 e. Discrepancy Indication Space: _____
 I hereby certify that the above named material has been accepted and to the best of my knowledge the foregoing is true and accurate.
[Signature] Name of Authorized Agent
[Signature] Signature
11/30/00 Receipt Date

Section IV ASBESTOS (Generator completes a, b, c, d, e, f, g, h, i, j, k, l, m, n, o, p, q, r, s, t, u, v, w, x, y, z. Shipper completes a, b, c, d, e, f, g, h, i, j, k, l, m, n, o, p, q, r, s, t, u, v, w, x, y, z.)

a. Shippers* Name: _____ b. Shippers* Phone No.: _____
 c. Shippers* Address: _____
 d. Shippers's Special Handling Instructions and additional information: _____

CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packaged, marked, and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations.



NON-HAZARDOUS SPECIAL WASTE & ASBESTOS MANIFEST

If waste is asbestos waste, complete Sections I, II, III and IV.
If waste is NOT asbestos waste, complete only Sections I, II and III.

No. 655164

Section I

GENERATOR (Generator completes all of Section I)

a. Generator Name: Kirkman Electric b. Generating Location: ~~Atlanta~~ Decatur
 c. Address: 101 Kirkman Dr. d. Address: Cyclot Springs, Ms 39059
Cyclot Springs, Ms 39059
 e. Phone No.: _____ f. Phone No.: _____

If owner of the generating facility differs from the generator, provide:

g. Owner's Name: _____ h. Owner's Phone No.: _____

i. BFI WASTE CODE:

M	L	0	3	J	J	0	4	R
---	---	---	---	---	---	---	---	---

 Containers:

--	--	--	--	--	--

 j. Description of Waste: oil contaminated w/ ABC's k. Quantity:

--	--	--	--	--	--

 Units: y No.:

--	--

 TYPE:

--	--	--	--

 T - TRUCK
 O - OTHER

TYPE	
DM	- METAL DRUM
DP	- PLASTIC DRUM
B	- BAG
BA	- 6 MIL. PLASTIC BAG or WRAP
UNITS	
P	- POUNDS
Y	- YARDS
M ³	- CUBIC METERS
Y ³	- CUBIC YARDS
O	- OTHER

GENERATOR'S CERTIFICATION: I hereby certify that the above named material is not a hazardous waste as defined by 40 CFR Part 261 or any applicable state law, has been properly described, classified and packaged, and is in proper condition for transportation according to applicable regulations; AND, if the waste is a treatment residue of a previously restricted hazardous waste subject to the Land Disposal Restrictions, I certify and warrant that the waste has been treated in accordance with the requirements of 40 CFR Part 268 and is no longer a hazardous waste as defined by 40 CFR Part 261.

Mark Thomas Signature: [Signature] Shipment Date:

11	3	0	0
----	---	---	---

Section II

TRANSPORTER (Generator complete a-d; Transporter I complete e-g; Transporter II complete h-j)

TRANSPORTER I

Name: Super Service
 Address: 70 Fox Dr
Decatur, Ms 38844
 c. Driver Name/Title: Robert S. Barnette
 PRINT/TITLE
 d. Phone No.: 662-694-3343 e. Truck No.: T-13
 f. Vehicle License No./State: A37797 MS

Acknowledgement of Receipt of Materials.

g. [Signature] Driver Signature Shipment Date:

11	3	0	0
----	---	---	---

TRANSPORTER II

h. Name: _____
 i. Address: _____
 j. Driver Name/Title: _____
 PRINT/TITLE
 k. Phone No.: _____ l. Truck No.: _____
 m. Vehicle License No./State: _____

Acknowledgement of Receipt of Materials.

n. _____ Driver Signature Shipment Date:

--	--	--	--

Section III

DESTINATION (Generator completes a-d; Destination Site completes e-g)

a. Site Name: BFI Little Rock Landfill c. Phone No.: 501-782-9988
 b. Physical Address: 700 N. Spawley Lake Rd. d. Mailing Address: Same
Reliance, Ms 39157
 e. Discrepancy Indication Space: _____

I hereby certify that the above named material has been accepted and to the best of my knowledge the foregoing is true and accurate.

f. [Signature] Name of Authorized Agent Signature: [Signature] Receipt Date:

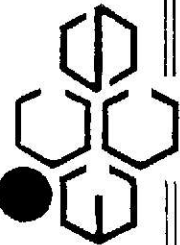
11	3	0	0
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Section IV

ASBESTOS (Generator complete a-d, f, g; Shipper completes e)

a. Shippers' Name: _____ b. Shippers' Phone No.: _____
 c. Shippers' Address: _____
 d. Shippers' Special Handling Instructions and additional information: _____

CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packaged, marked, and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations.



Environmental Chemistry Consulting Services, Inc.

2525 Advance Road,
Madison, WI 53718
Phone 608-221-8700 FAX 608-221-4889

CHAIN OF CUSTODY

No. 002962 of 2

30 NO 00

Turn Around (circle one) Normal Rush
Report Due:

Project Number:		Mail Report To:		P.O. No.:		Quote No.:		Laboratory Number	
Project Name: WALTON ELECTRIC		Company: AMER / MARTINDALE		Analysis Requested		Comments		Date/Time:	
Project Location: CASSIA SPRINGS MISS		Address:		Total Bottles		Preserv*		Date/Time:	
Sampled By (Print): ROBERT MARTIN		Date		Matrix		Time		Date/Time:	
Sample Description		Collection		Matrix		Time		Date/Time:	
ND FCS-1	0930	S	0950	MA	PCB			1795	
↓ -2								1796	
ND FCS-1	0946							1797	
↓ -2	0947							1798	
↓ -3	0948							1799	
↓ -4	0953							1800	
ND-FCS-3	1013							1801	
ND-FCS-5	1012							1802	
↓ -6	1015							1803	
FCS-FCS-49	1331							1806	
↓ -50	1332							1807	
↓ -51	1333							1808	
*Preservation Code		Relinquished By:		Date/Time:		Received By:		Date/Time:	
A=None B=HCL C=H2SO4		Robert Martin		11/20/00 1014		Robert Martin		10/14	
D=HNO3 E=EnCore F=Methanol		Relinquished By:		Date/Time:		Received By:		Date/Time:	
G=NaOH O=Other(Indicate)									
Custody Seal: Present/Absent		Intact/Not Intact		Seal #s		Receipt Temp:		Temp Blank Y N	
Shipped Via:									

① WHITE DUBO CASAPP TIME 10/14/00 FULLY IN 30A000
 WHITE - REPORT COPY YELLOW - LABORATORY COPY PINK - SAMPLER/SUBMITTER

Client: Martin & Slagle

Project ID: BW001

Date: 12/06/00

Report To: Robert Martin

Address: PO Box 1023

Contact: Robert Martin

Turnaround: Standard

Address: Black Mt, NC 28711

Phone: 828/669-5287

Job Number: _____

Fax: 828/669-5287

Invoice To: Martin & Slagle

Sample ID	Date	Time	Matrix	Preservatives		Received By	Date	Time	Analyses		Temperature	State Certification Requested
				1	2				1	2		
CESS-53	11/27/00	1641	Soil									NC _____ SC _____ Other _____ SEE REVERSE FOR TERMS AND CONDITIONS
CEFS-158	11/28/00	1424	Soil									
CESS-4	11/30/00	0953	Soil									
CEFS-160	11/30/00	1410	Soil									
CEFS-164	12/05/00	1541	Soil									
CESS-57	12/06/00	1350	Soil									
Comments: Please specify any special reporting requirements <u>G442-3</u>												
Relinquished By				Date	Time	Received By		Date	Time	Temperature	State Certification Requested	
<u>Robert Nair</u>				<u>12/06/00</u>	<u>1625</u>	<u>Julie Johnson</u>		<u>12/7/00</u>	<u>0930</u>	<u>46°C</u>		



Newman Duplex property looking east showing excavation of the median strip between the two driveways.



Newman Duplex property looking southeast showing excavation of the median strip between the two driveways.



Newman Duplex property looking southwest showing the completed excavation with sample locations marked by red flags.



Newman Duplex property looking south showing the excavation filled with clean soil following confirmation that all contaminated soil was removed.



Newman Duplex property looking north showing new sod being installed on the clean backfill.



Newman Duplex property looking east showing the completed landscaping.