U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

7000 1670 0009 6843 8562

OFFICIAL USE

Postage	$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	$

Postmark Here

Sent To: Paul Kellum

Street, Apt. No.; or PO Box No.: 412 LEE Avenue

City, State, ZIP+4: Crystal Springs, Ms, 39059

PS Form 3800, May 2000 — See Reverse for Instructions

Certified Mail Provides:

- A mailing receipt
- A unique identifier for your mailpiece
- A signature upon delivery
- A record of delivery kept by the Postal Service for two years

Important Reminders:

- Certified Mail may ONLY be combined with First-Class Mail or Priority Mail.
- Certified Mail is *not* available for any class of international mail.
- NO INSURANCE COVERAGE IS PROVIDED with Certified Mail. For valuables, please consider Insured or Registered Mail.
- For an additional fee, a *Return Receipt* may be requested to provide proof of delivery. To obtain Return Receipt service, please complete and attach a Return Receipt (PS Form 3811) to the article and add applicable postage to cover the fee. Endorse mailpiece "Return Receipt Requested". To receive a fee waiver for a duplicate return receipt, a USPS postmark on your Certified Mail receipt is required.
- For an additional fee, delivery may be restricted to the addressee or addressee's authorized agent. Advise the clerk or mark the mailpiece with the endorsement *"Restricted Delivery"*.
- If a postmark on the Certified Mail receipt is desired, please present the article at the post office for postmarking. If a postmark on the Certified Mail receipt is not needed, detach and affix label with postage and mail.

IMPORTANT: Save this receipt and present it when making an inquiry.

UNITED STATES POSTAL SERVICE

JACKSON MS 392
PM
22 APR

First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

• Print your name, address, and ZIP Code in this box •

DEPT. OF ENVIRONMENTAL QUALITY
OFFICE OF POLLUTION CONTROL
P.O. BOX 10385
JACKSON MS 39289-0385

9289+0385

T. Russell

3/13/ Date

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a, and 4b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write *"Return Receipt Requested"* on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

1. ☐ Addressee's Address
2. ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

MR. &MRS PAUL KELLUM
412 LEE AVENUE
CRYSTAL SPRINGS MS 39059

4a. Article Number

70001670000968438562

4b. Service Type

- ☐ Registered
- ☒ Certified
- ☐ Express Mail
- ☐ Insured
- ☒ Return Receipt for Merchandise
- ☐ COD

7. Date of Delivery

4/20/02

5. Received By: *(Print Name)*

PAUL Kellum

6. Signature: *(Addressee or Agent)*

X Paul Kellum

8. Addressee's Address *(Only if requested and fee is paid)*

Is your RETURN ADDRESS completed on the reverse side?

Thank you for using Return Receipt Service.

PS Form **3811,** December 1994 102595-97-B-0179 **Domestic Return Receipt**

STATE OF MISSISSIPPI
DAVID RONALD MUSGROVE, GOVERNOR
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY
CHARLES H. CHISOLM, EXECUTIVE DIRECTOR

FILE COPY

April 19, 2002

CERTIFIED LETTER NO. 7000 1670 0009 6843 8562 RETURN RECEIPT REQUESTED

Mr. and Mrs. Paul Kellum
412 Lee Avenue
Crystal Springs, MS 39059

RE: Kuhlman Electric Site
Crystal Springs, Mississippi

Dear Mr. and Mrs. Kellum:

The Mississippi Department of Environmental Quality (MDEQ) has completed a review of the Uncontrolled Sites file and the Site Remediation Report for the above referenced site prepared by Martin & Slagle GeoEnvironmental Associates and dated February 2002. The MDEQ requires no further corrective action at this site at this time. If cleanup standards change or additional data becomes available for the site then MDEQ will notify the appropriate parties of the need for any additional investigation(s) or remedial action(s). These actions will be consistent with our need to protect human health, welfare, and/or the environment.

If you have any questions, concerning this matter, please contact me at (601) 961-5318.

Sincerely,

Tony Russell, Chief
Uncontrolled Sites Branch

K:\Shared\UCSS\Gretchen Zmitrovich\Kuhlman Electric\Off-site\Kuhlman Electric-412 Lee Avenue (Kellum) SNFA 4-19-02.doc

OFFICE OF POLLUTION CONTROL
POST OFFICE BOX 10385 • JACKSON, MISSISSIPPI 39289-0385 • TEL: (601) 961-5171 • FAX: (601) 354-6612 • www.deq.state.ms.us
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STATE OF MISSISSIPPI
DAVID RONALD MUSGROVE, GOVERNOR
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY
CHARLES H. CHISOLM, EXECUTIVE DIRECTOR

October 9, 2000

Mr. and Mrs. Paul Kellum
412 Lee Avenue
Crystal Springs, Mississippi 39059

RE: soil and wipe sampling

Dear Mr. and Mrs. Kellum:

Please find attached the report for the soil and wipe sampling recently conducted at 412 Lee Avenue, Crystal Springs, MS. The report includes the following:

1. a map showing the sampling locations,
2. a table containing the sample results from the analysis conducted by the mobile laboratory, Environmental Chemistry Consulting Services, and
3. data sheets containing the split sample results from the analysis conducted by the fixed laboratory, Paradigm Analytical Laboratories, Inc.

The MDEQ has scheduled a meeting at 6:00 p.m. on Tuesday, October 10, 2000 at City Hall in Crystal Springs to discuss the results and the remediation of your property. Please contact Gretchen Zmitrovich at 601-961-5240 if you have any questions regarding this report.

Sincerely,

Tony Russell, Chief
Uncontrolled Sites Section

Enclosure

Kuhlman Electric-412 Lee report_10-9-00 (gz)

OFFICE OF POLLUTION CONTROL
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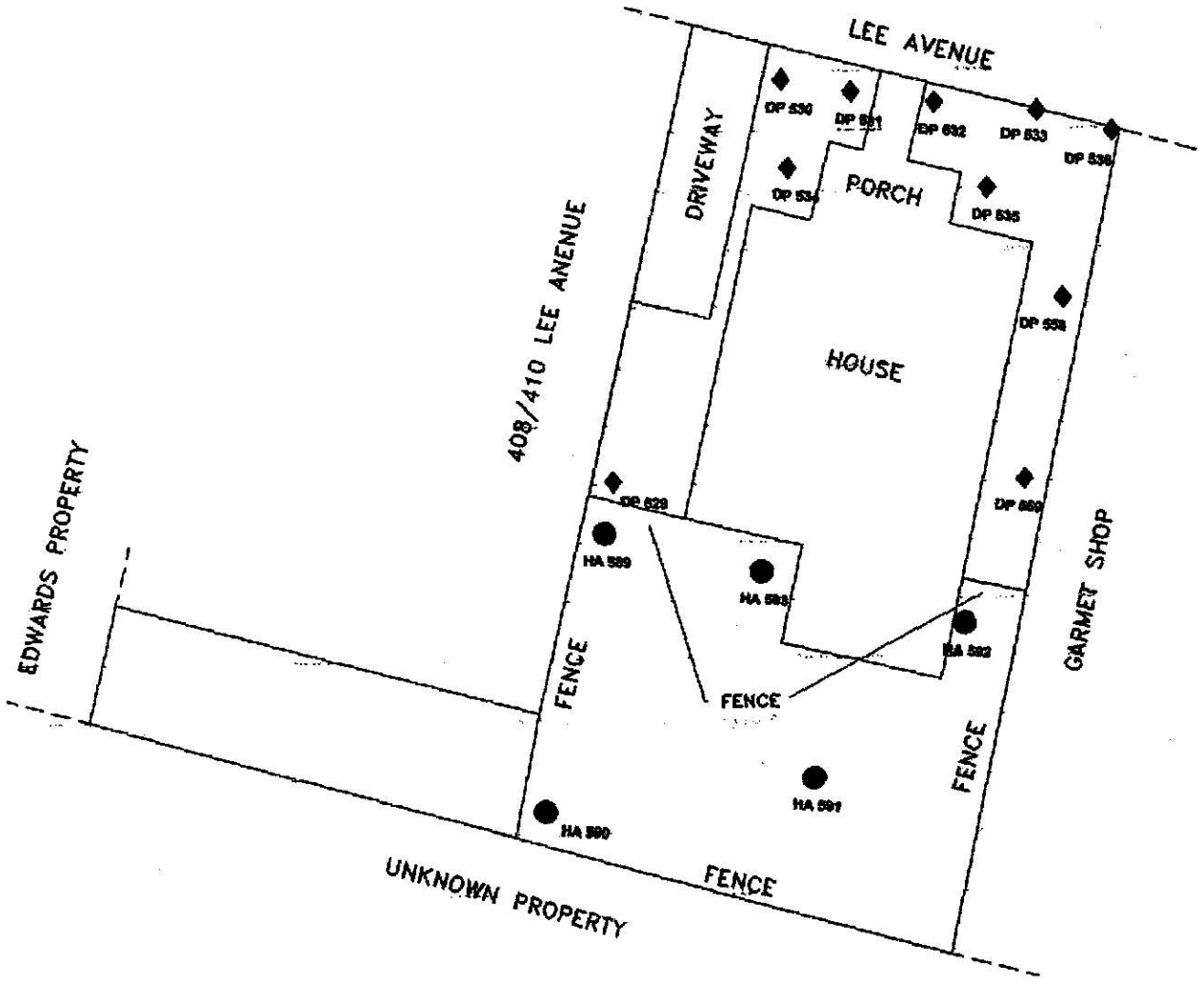
COPY



LEGEND

◆ SAMPLE POINT
DP 592 SAMPLE POINT NUMBER
● SAMPLE POINT
HA 590 SAMPLE POINT NUMBER

1) ALL DISTANCES ARE ESTIMATED
2) THIS MAP WAS PREPARED FROM RECORD MAPS
3) THIS MAP HAS BEEN PREPARED FOR PRESENTATION PURPOSES ONLY

SAMPLE LOCATIONS FOR KELLUM PROPERTY 412 LEE AVENUE

SCALE: AS SHOWN	DR MDI	CHK TF	REV BPS

PREPARED BY:

OGDEN ENVIRONMENTAL AND ENGINEERING SERVICES

200 SOUTH OLD STATEVILLE ROAD • HUNTERSVILLE, NC 28078 • 704-875-3570

PROJ: 073350000	DATE: 09/24/00	SHEET 1 OF 1

Soil and Wipe Sample Results
Kellum Property
412 Lee Avenue
Crystal Springs, Mississippi

SOIL SAMPLES (MG/KG)									
Target Analyte	Sample #	DP-529	DP-529	DP-529	DP-530	DP-530	DP-530	DP-531	DP-531
	Depth (ft)	0.5	2.5	4	0.5	2.5	4	0.5	2.5
	Lab #	530	531	532	533	534	535	536	537
PCB as 1260		0.12	<0.10	NA	1.6	<0.10	NA	3.2	<0.10
	Collection Date	8/25/00	8/25/00	8/25/00	8/26/00	8/26/00	8/26/00	8/26/00	8/26/00
	Collection Time	17:00	17:01	17:02	8:13	8:14	8:15	8:26	8:27
	Injection Date	8/26/00	8/26/00	NA	8/26/00	8/26/00	NA	8/26/00	8/26/00

Notes:
NA Indicates Sample Not Analyzed

WIPE SAMPLES (TOTAL UG)							
Target Analyte	Sample #	KW-1	KW-2	KW-3	KW-4	KW-5	KW-6
	Depth						
	Lab #	651 SWAB	652	653	654	655	656
PCB as 1260		<0.50	<0.50	<0.50	<0.50	<0.50	0.56
	Collection Date	8/28/00	8/28/00	8/28/00	8/28/00	8/28/00	8/28/00
	Collection Time	15:44	15:48	15:49	15:50	15:53	15:56
	Injection Date	8/29/00	8/29/00	8/29/00	8/29/00	8/29/00	8/29/00

Notes:

LOCATION:

KW1: Plastic lawn table next to DP558.
KW2: Top of barbecue grill.
KW3: Above handle on screen door to front porch.
KW4: Plastic table next to DP530.
KW5: Bricks next to DP534.
KW6: Bricks next to DP535.

Soil and Wipe Sample Results
Kellum Property
412 Lee Avenue
Crystal Springs, Mississippi

SOIL SAMPLES (MG/KG)									
DP-531	Target Analyte	Sample #	DP-532	DP-532	DP-532	DP-533	DP-533	DP-533	DP-534
4		Depth (ft)	0.5	2.5	4	0.5	2.5	4	0.5
538		Lab #	539	540	541	542	543	544	545
NA	PCB as 1260		5.5	<0.10	NA	2.3	<0.10	NA	16
8/26/00		Collection Date	8/26/00	8/26/00	8/26/00	8/26/00	8/26/00	8/26/00	8/26/00
8:28		Collection Time	9:20	9:21	9:22	9:25	9:26	9:27	10:10
NA		Injection Date	8/26/00	8/26/00	NA	8/26/00	8/26/00	NA	8/26/00

Notes:
NA Indicates Sample Not Analyzed

SOIL SAMPLES (MG/KG)								
Target Analyte	Sample #	DP-534	DP-535	DP-535	DP-535	DP-536	DP-536	DP-536
	Depth (ft)	4	0.5	2.5	4	0.5	2.5	4
	Lab #	547	548	549	552	550	551	555
PCB as 1260		NA	5.2	0.16	NA	1.8	<0.10	NA
	Collection Date	8/26/00	8/26/00	8/26/00	8/26/00	8/26/00	8/26/00	8/26/00
	Collection Time	10:12	10:40	10:45	10:21	10:19	10:20	10:26
	Injection Date	NA	8/26/00	8/26/00	NA	8/26/00	8/26/00	NA

Notes:
NA Indicates Sample Not Analyzed

Soil and Wipe Sample Results
Kellum Property
412 Lee Avenue
Crystal Springs, Mississippi

	SOIL SAMPLES (MG/KG)								
DP-534	Target Analyte	Sample #	DP-558	DP-559	DP-559	HA-589	HA-589	HA-590	HA-590
2.5		Depth (ft)	2.5	0.5	2.5	0.5	2.5	0.5	2.5
546		Lab #	606	607	608	712	713	714	715
<0.10	PCB as 1260		<0.10	3.3	0.44	0.15	<0.10	0.13	<0.10
8/26/00		Collection Date	8/26/00	8/26/00	8/26/00	8/29/00	8/29/00	8/29/00	8/29/00
10:11		Collection Time	16:06	16:15	16:20	15:50	15:55	16:00	16:05
8/26/00		Injection Date	8/27/00	8/27/00	8/27/00	8/30/00	8/30/00	8/30/00	8/31/00

	SOIL SAMPLES (MG/KG)							
DP-558	Target Analyte	Sample #	HA-591	HA-591	HA-592	HA-592	HA-593	HA-593
0.5		Depth (ft)	0.5	2.5	0.5	2.5	0.5	2.5
605		Lab #	716	717	718	719	720	721
7.8	PCB as 1260		0.23J	<0.10	0.76J	<0.10	0.33J	<0.10
8/26/00		Collection Date	8/29/00	8/29/00	8/29/00	8/29/00	8/29/00	8/29/00
16:05		Collection Time	16:16	16:20	16:35	16:40	16:45	16:55
8/27/00		Injection Date	8/31/00	8/31/00	8/31/00	8/31/00	8/31/00	8/31/00

Notes:

* J Estimated level, due to interference from the presence of Technical Chlordane, DDT, DDD, & DDE.

PARAGON ANALYTICAL LABORATORIES, INC.

Results for PCBs
by EPA 8082

Client Sample ID: DP 529-0.5'
Client Project ID: Kuhlman Electric
Lab Sample ID: 94191
Lab Project ID: G185-80
Matrix: Soil %SOLIDS: 95.1

Date Collected: 8/25/00
Date Received: 8/29/00
Date Analyzed: 9/7/00
Analyzed By: CLP
Dilution: 1

Compound	Quantitation Limit (ug/KG)	Result (ug/KG)
Arochlor-1016	160	BQL
Arochlor-1221	160	BQL
Arochlor-1232	160	BQL
Arochlor-1242	160	BQL
Arochlor-1248	160	BQL
Arochlor-1254	160	BQL
Arochlor-1260	160	BQL
Arochlor-1262	160	BQL

Surrogate Spike Recoveries	Spike Added	Spike Result	Percent Recovered
TCMX	100	59	59

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

Reviewed By:

PARAGON ANALYTICAL LABORATORIES, INC.

Results for Semivolatiles
by GCMS 8270

Client Sample ID: DP 529-0.5'
Client Project ID: Kuhlman Electric
Lab Sample ID: 94191
Lab Project ID: G185-80
Matrix: Soil %Solids: 95.1

Date Collected: 8/25/00
Date Received: 8/29/00
Date Analyzed: 9/6/00
Analyzed By: MRC
Dilution: 1

Compound	Quantitation Limit (ug/KG)	Result (ug/KG)
Acenaphthene	310	BQL
Acenaphthylene	310	BQL
Anthracene	310	BQL
Benzo[a]anthracene	310	BQL
Benzo[a]pyrene	310	BQL
Benzo[b]fluoranthene	310	BQL
Benzo[g,h,i]perylene	310	BQL
Benzo[k]fluoranthene	310	BQL
Benzoic Acid	620	BQL
Bis(2-chloroethoxy)methane	310	BQL
Bis(2-chloroethyl)ether	310	BQL
Bis(2-chloroisopropyl)ether	310	BQL
Bis(2-ethylhexyl)phthalate	310	BQL
4-bromophenyl phenyl ether	310	BQL
Butylbenzylphthalate	310	BQL
4-Chloroaniline	310	BQL
4-Chloro-3-methylphenol	310	BQL
2-Chloronaphthalene	310	BQL
2-Chlorophenol	310	BQL
4-Chlorophenyl phenyl ether	310	BQL
Chrysene	310	BQL
Di-n-Butylphthalate	310	BQL
Di-n-octylphthalate	310	BQL
Dibenzo[a,h]anthracene	310	BQL
Dibenzofuran	310	BQL
1,2-Dichlorobenzene	310	BQL
1,3-Dichlorobenzene	310	BQL
1,4-Dichlorobenzene	310	BQL
3,3'-Dichlorobenzidine	620	BQL
2,4-Dichlorophenol	310	BQL
Diethylphthalate	310	BQL
2,4-Dimethylphenol	310	BQL
Dimethylphthalate	310	BQL
4,6-Dinitro-2-methylphenol	1500	BQL
2,4-Dinitrophenol	1500	BQL
2,4-Dinitrotoluene	310	BQL
2,6-Dinitrotoluene	310	BQL
Fluoranthene	310	BQL
Fluorene	310	BQL
Hexachlorobenzene	310	BQL
Hexachlorobutadiene	310	BQL
Hexachlorocyclopentadiene	620	BQL
Hexachloroethane	310	BQL
Indeno(1,2,3-c,d)pyrene	310	BQL
Isophorone	310	BQL

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

Results for Semivolatiles
by GCMS 8270

Client Sample ID: DP 529-0.5'
Client Project ID: Kuhlman Electric
Lab Sample ID: 94191
Lab Project ID: G185-80
Matrix: Soil %Solids: 95.1

Date Collected: 8/25/00
Date Received: 8/29/00
Date Analyzed: 9/6/00
Analyzed By: MRC
Dilution: 1

Compound	Quantitation Limit (ug/KG)	Result (ug/KG)
2-Methylnaphthalene	310	BQL
2-Methylphenol	310	BQL
3- & 4-Methylphenol	310	BQL
N-Nitrosodi-n-propylamine	310	BQL
N-Nitrosodiphenylamine	310	BQL
Naphthalene	310	BQL
2-Nitroaniline	310	BQL
3-Nitroaniline	310	BQL
4-Nitroaniline	310	BQL
Nitrobenzene	310	BQL
2-Nitrophenol	310	BQL
4-Nitrophenol	1500	BQL
Pentachlorobenzene	310	BQL
Pentachlorophenol	1500	BQL
Phenanthrene	310	BQL
Phenol	310	BQL
Pyrene	310	BQL
1,2,3,4-Tetrachlorobenzene	310	BQL
1,2,3,5- & 1,2,4,5-Tetrachlorobenzene	310	BQL
1,2,3-Trichlorobenzene	310	BQL
1,2,4-Trichlorobenzene	310	BQL
1,3,5-Trichlorobenzene	310	BQL
2,4,5-Trichlorophenol	310	BQL
2,4,6-Trichlorophenol	310	BQL

Surrogate Spike Recoveries	Spike Added	Spike Result	Percent Recovered
2-Fluorobiphenyl	10	9.4	94
2-Fluorophenol	10	8	80
Nitrobenzene-d5	10	9.1	91
Phenol-d6	10	9.1	91
2,4,6-Tribromophenol	10	7.3	73
4-Terphenyl-d14	10	11.8	119

Comments:

Results are corrected for %solids and dilution where applicable.

Flags:

BQL = Below Quantitation Limit.

Reviewed By: [signature]

PARAGON ANALYTICAL LABORATORIES, INC.

Results of Library Search for Semivolatile Compounds

by GCMS

Client Sample ID: DP 529-0.5'
Client Project ID: Kuhlman Electric
Lab Sample ID: 94191
Lab Project ID: G185-80
Matrix: Soil %SOLIDS 95.1

Date Collected: 8/25/00
Date Received: 8/29/00
Date Analyzed: 9/6/00
Analyzed By: MRC
Dilution: 1

Num.	Compound	CAS#	Match Probability	Result (ug/KG)
1	Unknown			6300
2	Unknown			350
3	Unknown			250
4	Unknown			230
5	Unknown			120
6				
7				
8				
9				
10				

Comment:

Tentatively Identified Compound (TIC) refers to substances which are not present in the list of target compounds. Therefore, not all TICs are identified and quantitated using individual standards. TIC listings are prepared utilizing a computerized library search of electron impact mass spectral data and evaluation of the relevant data by a mass spectral data specialist.

Quantitation is accomplished by relative peak height of the compound compared to that of the nearest internal standard from the total ion chromatogram. TICs are identified and quantitated only if the peak height is equal to or greater than 10% of that of the nearest internal standard. Quantitation provided is an estimate.

Reviewed by: _____

PARAGON ANALYTICAL LABORATORIES, INC.

Results for PCBs
by EPA 8082

Client Sample ID: DP 529-2.5
Client Project ID: Kuhlman Electric
Lab Sample ID: 94460
Lab Project ID: G185-81
Matrix: Soil %SOLIDS: 90.0

Date Collected: 8/25/00
Date Received: 9/1/00
Date Analyzed: 9/7/00
Analyzed By: CLP
Dilution: 1

Compound	Quantitation Limit (ug/KG)	Result (ug/KG)
Arochlor-1016	250	BQL
Arochlor-1221	250	BQL
Arochlor-1232	250	BQL
Arochlor-1242	250	BQL
Arochlor-1248	250	BQL
Arochlor-1254	250	BQL
Arochlor-1260	250	BQL
Arochlor-1262	250	BQL

Surrogate Spike Recoveries	Spike Added	Spike Result	Percent Recovered
TCMX	100	43	43

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

Reviewed By:

PARAGON ANALYTICAL LABORATORIES, INC.

Results for Semivolatiles
by GCMS 8270

Client Sample ID: DP 529-2.5
Client Project ID: Kuhlman Electric
Lab Sample ID: 94460
Lab Project ID: G185-81
Matrix: Soil %Solids: 90.0

Date Collected: 8/25/00
Date Received: 9/1/00
Date Analyzed: 9/12/00
Analyzed By: MRC
Dilution: 1

Compound	Quantitation Limit (ug/KG)	Result (ug/KG)
Acenaphthene	380	BQL
Acenaphthylene	380	BQL
Anthracene	380	BQL
Benzo[a]anthracene	380	BQL
Benzo[a]pyrene	380	BQL
Benzo[b]fluoranthene	380	BQL
Benzo[g,h,i]perylene	380	BQL
Benzo[k]fluoranthene	380	BQL
Benzoic Acid	760	BQL
Bis(2-chloroethoxy)methane	380	BQL
Bis(2-chloroethyl)ether	380	BQL
Bis(2-chloroisopropyl)ether	380	BQL
Bis(2-ethylhexyl)phthalate	380	BQL
4-bromophenyl phenyl ether	380	BQL
Butylbenzylphthalate	380	BQL
4-Chloroaniline	380	BQL
4-Chloro-3-methylphenol	380	BQL
2-Chloronaphthalene	380	BQL
2-Chlorophenol	380	BQL
4-Chlorophenyl phenyl ether	380	BQL
Chrysene	380	BQL
Di-n-Butylphthalate	380	BQL
Di-n-octylphthalate	380	BQL
Dibenzo[a,h]anthracene	380	BQL
Dibenzofuran	380	BQL
1,2-Dichlorobenzene	380	BQL
1,3-Dichlorobenzene	380	BQL
1,4-Dichlorobenzene	380	BQL
3,3'-Dichlorobenzidine	760	BQL
2,4-Dichlorophenol	380	BQL
Diethylphthalate	380	BQL
2,4-Dimethylphenol	380	BQL
Dimethylphthalate	380	BQL
4,6-Dinitro-2-methylphenol	1900	BQL
2,4-Dinitrophenol	1900	BQL
2,4-Dinitrotoluene	380	BQL
2,6-Dinitrotoluene	380	BQL
Fluoranthene	380	BQL
Fluorene	380	BQL
Hexachlorobenzene	380	BQL
Hexachlorobutadiene	380	BQL
Hexachlorocyclopentadiene	760	BQL
Hexachloroethane	380	BQL
Indeno(1,2,3-c,d)pyrene	380	BQL
Isophorone	380	BQL

PARAGON ANALYTICAL LABORATORIES, INC.

Results for Semivolatiles
by GCMS 8270

Client Sample ID: DP 529-2.5
Client Project ID: Kuhlman Electric
Lab Sample ID: 94460
Lab Project ID: G185-81
Matrix: Soil %Solids: 90.0

Date Collected: 8/25/00
Date Received: 9/1/00
Date Analyzed: 9/12/00
Analyzed By: MRC
Dilution: 1

Compound	Quantitation Limit (ug/KG)	Result (ug/KG)
2-Methylnaphthalene	380	BQL
2-Methylphenol	380	BQL
3- & 4-Methylphenol	380	BQL
N-Nitrosodi-n-propylamine	380	BQL
N-Nitrosodiphenylamine	380	BQL
Naphthalene	380	BQL
2-Nitroaniline	380	BQL
3-Nitroaniline	380	BQL
4-Nitroaniline	380	BQL
Nitrobenzene	380	BQL
2-Nitrophenol	380	BQL
4-Nitrophenol	1900	BQL
Pentachlorobenzene	380	BQL
Pentachlorophenol	1900	BQL
Phenanthrene	380	BQL
Phenol	380	BQL
Pyrene	380	BQL
1,2,3,4-Tetrachlorobenzene	380	BQL
1,2,3,5- & 1,2,4,5-Tetrachlorobenzene	380	BQL
1,2,3-Trichlorobenzene	380	BQL
1,2,4-Trichlorobenzene	380	BQL
1,3,5-Trichlorobenzene	380	BQL
2,4,5-Trichlorophenol	380	BQL
2,4,6-Trichlorophenol	380	BQL

Surrogate Spike Recoveries	Spike Added	Spike Result	Percent Recovered
2-Fluorobiphenyl	10	10.4	104
2-Fluorophenol	10	3.7	37
Nitrobenzene-d5	10	9.2	92
Phenol-d6	10	5.1	51
2,4,6-Tribromophenol	10	2.6	26
4-Terphenyl-d14	10	14.1	141

Comments:

Results are corrected for %solids and dilution where applicable.

Flags:

BQL = Below Quantitation Limit.

Reviewed By:

PARAGON ANALYTICAL LABORATORIES, INC.

Results of Library Search for Semivolatile Compounds

by GCMS

Client Sample ID:	DP 529-2.5			Date Collected:	8/25/00
Client Project ID:	Kuhlman Electric			Date Received:	9/1/00
Lab Sample ID:	94460			Date Analyzed:	9/12/00
Lab Project ID:	G185-81			Analyzed By:	MRC
Matrix:	Soil	%SOLIDS	90.0	Dilution:	1

Num.	Compound	CAS#	Match Probability	Result (ug/KG)
1	No library search compounds detected.			
2				
3				
4				
5				
6				
7				
8				
9				
10				

Comment:

Tentatively Identified Compound (TIC) refers to substances which are not present in the list of target compounds. Therefore, not all TICs are identified and quantitated using individual standards. TIC listings are prepared utilizing a computerized library search of electron impact mass spectral data and evaluation of the relevant data by a mass spectral data specialist.

Quantitation is accomplished by relative peak height of the compound compared to that of the nearest internal standard from the total ion chromatogram. TICs are identified and quantitated only if the peak height is equal to or greater than 10% of that of the nearest internal standard. Quantitation provided is an estimate.

Reviewed by: _____

PAR[redacted]GM ANALYTICAL LABORATORI[redacted]INC.

Results for PCBs
by EPA 8082

Client Sample ID: DP 534-0.5'
Client Project ID: Kuhlman Electric
Lab Sample ID: 94192
Lab Project ID: G185-80
Matrix: Soil %SOLIDS: 86.3

Date Collected: 8/26/00
Date Received: 8/29/00
Date Analyzed: 9/13/00
Analyzed By: CLP
Dilution: 10

Compound	Quantitation Limit (ug/KG)	Result (ug/KG)
Arochlor-1016	1800	BQL
Arochlor-1221	1800	BQL
Arochlor-1232	1800	BQL
Arochlor-1242	1800	BQL
Arochlor-1248	1800	BQL
Arochlor-1254	1800	BQL
Arochlor-1260	1800	**4300**
Arochlor-1262	1800	BQL

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

*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: [signature]

Results for Semivolatiles
by GCMS 8270

Client Sample ID: DP 534-0.5'
Client Project ID: Kuhlman Electric
Lab Sample ID: 94192
Lab Project ID: G185-80
Matrix: Soil %Solids: 86.3

Date Collected: 8/26/00
Date Received: 8/29/00
Date Analyzed: 9/6/00
Analyzed By: MRC
Dilution: 1

Compound	Quantitation Limit (ug/KG)	Result (ug/KG)
Acenaphthene	420	BQL
Acenaphthylene	420	BQL
Anthracene	420	BQL
Benzo[a]anthracene	420	1100
Benzo[a]pyrene	420	1500
Benzo[b]fluoranthene	420	2000
Benzo[g,h,i]perylene	420	1000
Benzo[k]fluoranthene	420	1300
Benzoic Acid	840	BQL
Bis(2-chloroethoxy)methane	420	BQL
Bis(2-chloroethyl)ether	420	BQL
Bis(2-chloroisopropyl)ether	420	BQL
Bis(2-ethylhexyl)phthalate	420	BQL
4-bromophenyl phenyl ether	420	BQL
Butylbenzylphthalate	420	BQL
4-Chloroaniline	420	BQL
4-Chloro-3-methylphenol	420	BQL
2-Chloronaphthalene	420	BQL
2-Chlorophenol	420	BQL
4-Chlorophenyl phenyl ether	420	BQL
Chrysene	420	1500
Di-n-Butylphthalate	420	BQL
Di-n-octylphthalate	420	BQL
Dibenzo[a,h]anthracene	420	BQL
Dibenzofuran	420	BQL
1,2-Dichlorobenzene	420	BQL
1,3-Dichlorobenzene	420	BQL
1,4-Dichlorobenzene	420	BQL
3,3'-Dichlorobenzidine	840	BQL
2,4-Dichlorophenol	420	BQL
Diethylphthalate	420	BQL
2,4-Dimethylphenol	420	BQL
Dimethylphthalate	420	BQL
4,6-Dinitro-2-methylphenol	2100	BQL
2,4-Dinitrophenol	2100	BQL
2,4-Dinitrotoluene	420	BQL
2,6-Dinitrotoluene	420	BQL
Fluoranthene	420	2600
Fluorene	420	BQL
Hexachlorobenzene	420	BQL
Hexachlorobutadiene	420	BQL
Hexachlorocyclopentadiene	840	BQL
Hexachloroethane	420	BQL
Indeno(1,2,3-c,d)pyrene	420	1200
Isophorone	420	BQL

Results for Semivolatiles
by GCMS 8270

Client Sample ID: DP 534-0.5'
Client Project ID: Kuhlman Electric
Lab Sample ID: 94192
Lab Project ID: G185-80
Matrix: Soil %Solids: 86.3

Date Collected: 8/26/00
Date Received: 8/29/00
Date Analyzed: 9/6/00
Analyzed By: MRC
Dilution: 1

Compound	Quantitation Limit (ug/KG)	Result (ug/KG)
2-Methylnaphthalene	420	BQL
2-Methylphenol	420	BQL
3- & 4-Methylphenol	420	BQL
N-Nitrosodi-n-propylamine	420	BQL
N-Nitrosodiphenylamine	420	BQL
Naphthalene	420	BQL
2-Nitroaniline	420	BQL
3-Nitroaniline	420	BQL
4-Nitroaniline	420	BQL
Nitrobenzene	420	BQL
2-Nitrophenol	420	BQL
4-Nitrophenol	2100	BQL
Pentachlorobenzene	420	BQL
Pentachlorophenol	2100	BQL
Phenanthrene	420	740
Phenol	420	BQL
Pyrene	420	2200
1,2,3,4-Tetrachlorobenzene	420	BQL
1,2,3,5- & 1,2,4,5-Tetrachlorobenzene	420	BQL
1,2,3-Trichlorobenzene	420	BQL
1,2,4-Trichlorobenzene	420	BQL
1,3,5-Trichlorobenzene	420	BQL
2,4,5-Trichlorophenol	420	BQL
2,4,6-Trichlorophenol	420	BQL

Surrogate Spike Recoveries	Spike Added	Spike Result	Percent Recovered
2-Fluorobiphenyl	10	9.8	98
2-Fluorophenol	10	7.9	79
Nitrobenzene-d5	10	9.7	97
Phenol-d6	10	9.4	94
2,4,6-Tribromophenol	10	7.5	74
4-Terphenyl-d14	10	12.2	122

Comments:

Results are corrected for %solids and dilution where applicable.

Flags:

BQL = Below Quantitation Limit.

Reviewed By:

PARAGON ANALYTICAL LABORATORIES, INC.

Results of Library Search for Semivolatile Compounds

by GCMS

Client Sample ID: DP 534-0.5'
Client Project ID: Kuhlman Electric
Lab Sample ID: 94192
Lab Project ID: G185-80
Matrix: Soil %SOLIDS 86.3

Date Collected: 8/26/00
Date Received: 8/29/00
Date Analyzed: 9/6/00
Analyzed By: MRC
Dilution: 1

Num.	Compound	CAS#	Match Probability	Result (ug/KG)
1	Aromatic, Unknown			1800
2	Alkane, Unknown			1300
3	Alkane, Unknown			920
4	Unknown			640
5	Unknown			400
6	Unknown			390
7	Unknown			380
8	Unknown			360
9	Unknown			360
10	Unknown			350

Comment:

Tentatively Identified Compound (TIC) refers to substances which are not present in the list of target compounds. Therefore, not all TICs are identified and quantitated using individual standards. TIC listings are prepared utilizing a computerized library search of electron impact mass spectral data and evaluation of the relevant data by a mass spectral data specialist.

Quantitation is accomplished by relative peak height of the compound compared to that of the nearest internal standard from the total ion chromatogram. TICs are identified and quantitated only if the peak height is equal to or greater than 10% of that of the nearest internal standard. Quantitation provided is an estimate.

Reviewed by: _____

PARAGON ANALYTICAL LABORATORIES, INC.

Results for PCBs
by EPA 8082

Client Sample ID: DP 534-2.5
Client Project ID: Kuhlman Electric
Lab Sample ID: 94446
Lab Project ID: G185-81
Matrix: Soil %SOLIDS: 88.2

Date Collected: 8/26/00
Date Received: 9/1/00
Date Analyzed: 9/7/00
Analyzed By: CLP
Dilution: 1

Compound	Quantitation Limit (ug/KG)	Result (ug/KG)
Arochlor-1016	170	BQL
Arochlor-1221	170	BQL
Arochlor-1232	170	BQL
Arochlor-1242	170	BQL
Arochlor-1248	170	BQL
Arochlor-1254	170	BQL
Arochlor-1260	170	BQL
Arochlor-1262	170	BQL

Surrogate Spike Recoveries	Spike Added	Spike Result	Percent Recovered
TCMX	100	44	44

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

Reviewed By:

PARAGON ANALYTICAL LABORATORIES, INC.

Results for Semivolatiles
by GCMS 8270

Client Sample ID: DP 534-2.5
Client Project ID: Kuhlman Electric
Lab Sample ID: 94446
Lab Project ID: G185-81
Matrix: Soil %Solids: 88.2

Date Collected: 8/26/00
Date Received: 9/1/00
Date Analyzed: 9/12/00
Analyzed By: MRC
Dilution: 1

Compound	Quantitation Limit (ug/KG)	Result (ug/KG)
Acenaphthene	340	BQL
Acenaphthylene	340	BQL
Anthracene	340	BQL
Benzo[a]anthracene	340	BQL
Benzo[a]pyrene	340	BQL
Benzo[b]fluoranthene	340	BQL
Benzo[g,h,i]perylene	340	BQL
Benzo[k]fluoranthene	340	BQL
Benzoic Acid	690	BQL
Bis(2-chloroethoxy)methane	340	BQL
Bis(2-chloroethyl)ether	340	BQL
Bis(2-chloroisopropyl)ether	340	BQL
Bis(2-ethylhexyl)phthalate	340	BQL
4-bromophenyl phenyl ether	340	BQL
Butylbenzylphthalate	340	BQL
4-Chloroaniline	340	BQL
4-Chloro-3-methylphenol	340	BQL
2-Chloronaphthalene	340	BQL
2-Chlorophenol	340	BQL
4-Chlorophenyl phenyl ether	340	BQL
Chrysene	340	BQL
Di-n-Butylphthalate	340	BQL
Di-n-octylphthalate	340	BQL
Dibenzo[a,h]anthracene	340	BQL
Dibenzofuran	340	BQL
1,2-Dichlorobenzene	340	BQL
1,3-Dichlorobenzene	340	BQL
1,4-Dichlorobenzene	340	BQL
3,3'-Dichlorobenzidine	690	BQL
2,4-Dichlorophenol	340	BQL
Diethylphthalate	340	BQL
2,4-Dimethylphenol	340	BQL
Dimethylphthalate	340	BQL
4,6-Dinitro-2-methylphenol	1700	BQL
2,4-Dinitrophenol	1700	BQL
2,4-Dinitrotoluene	340	BQL
2,6-Dinitrotoluene	340	BQL
Fluoranthene	340	BQL
Fluorene	340	BQL
Hexachlorobenzene	340	BQL
Hexachlorobutadiene	340	BQL
Hexachlorocyclopentadiene	690	BQL
Hexachloroethane	340	BQL
Indeno(1,2,3-c,d)pyrene	340	BQL
Isophorone	340	BQL

PARA[redacted]M ANALYTICAL LABORATORIES[redacted]IC.

Results for Semivolatiles
by GCMS 8270

Client Sample ID: DP 534-2.5
Client Project ID: Kuhlman Electric
Lab Sample ID: 94446
Lab Project ID: G185-81
Matrix: Soil %Solids: 88.2

Date Collected: 8/26/00
Date Received: 9/1/00
Date Analyzed: 9/12/00
Analyzed By: MRC
Dilution: 1

Compound	Quantitation Limit (ug/KG)	Result (ug/KG)
2-Methylnaphthalene	340	BQL
2-Methylphenol	340	BQL
3- & 4-Methylphenol	340	BQL
N-Nitrosodi-n-propylamine	340	BQL
N-Nitrosodiphenylamine	340	BQL
Naphthalene	340	BQL
2-Nitroaniline	340	BQL
3-Nitroaniline	340	BQL
4-Nitroaniline	340	BQL
Nitrobenzene	340	BQL
2-Nitrophenol	340	BQL
4-Nitrophenol	1700	BQL
Pentachlorobenzene	340	BQL
Pentachlorophenol	1700	BQL
Phenanthrene	340	BQL
Phenol	340	BQL
Pyrene	340	BQL
1,2,3,4-Tetrachlorobenzene	340	BQL
1,2,3,5- & 1,2,4,5-Tetrachlorobenzene	340	BQL
1,2,3-Trichlorobenzene	340	BQL
1,2,4-Trichlorobenzene	340	BQL
1,3,5-Trichlorobenzene	340	BQL
2,4,5-Trichlorophenol	340	BQL
2,4,6-Trichlorophenol	340	BQL

Surrogate Spike Recoveries	Spike Added	Spike Result	Percent Recovered
2-Fluorobiphenyl	10	9.7	97
2-Fluorophenol	10	7.6	76
Nitrobenzene-d5	10	9.1	91
Phenol-d6	10	8.5	85
2,4,6-Tribromophenol	10	7.7	77
4-Terphenyl-d14	10	11.3	114

Comments:

Results are corrected for %solids and dilution where applicable.

Flags:

BQL = Below Quantitation Limit.

Reviewed By:

PARAGON ANALYTICAL LABORATORIES, INC.

Results of Library Search for Semivolatile Compounds

by GCMS

Client Sample ID:	DP 534-2.5			Date Collected:	8/26/00
Client Project ID:	Kuhlman Electric			Date Received:	9/1/00
Lab Sample ID:	94446			Date Analyzed:	9/12/00
Lab Project ID:	G185-81			Analyzed By:	MRC
Matrix:	Soil	%SOLIDS	88.2	Dilution:	1

Num.	Compound	CAS#	Match Probability	Result (ug/KG)
1	No library search compounds detected.			
2				
3				
4				
5				
6				
7				
8				
9				
10				

Comment:

Tentatively Identified Compound (TIC) refers to substances which are not present in the list of target compounds. Therefore, not all TICs are identified and quantitated using individual standards. TIC listings are prepared utilizing a computerized library search of electron impact mass spectral data and evaluation of the relevant data by a mass spectral data specialist.

Quantitation is accomplished by relative peak height of the compound compared to that of the nearest internal standard from the total ion chromatogram. TICs are identified and quantitated only if the peak height is equal to or greater than 10% of that of the nearest internal standard. Quantitation provided is an estimate.

Reviewed by: _____

PARAGON ANALYTICAL LABORATORIES, INC.

Results for PCBs
by EPA 8082

Client Sample ID: DP 536-0.5
Client Project ID: Kuhlman Electric
Lab Sample ID: 94447
Lab Project ID: G185-81
Matrix: Soil %SOLIDS: 94.9

Date Collected: 8/26/00
Date Received: 9/1/00
Date Analyzed: 9/7/00
Analyzed By: CLP
Dilution: 1

Compound	Quantitation Limit (ug/KG)	Result (ug/KG)
Arochlor-1016	160	BQL
Arochlor-1221	160	BQL
Arochlor-1232	160	BQL
Arochlor-1242	160	BQL
Arochlor-1248	160	BQL
Arochlor-1254	160	BQL
Arochlor-1260	160	460
Arochlor-1262	160	BQL

Surrogate Spike Recoveries	Spike Added	Spike Result	Percent Recovered
TCMX	100	41	41

*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:

PARA[redacted]M ANALYTICAL LABORATORIES[redacted]NC.

Results for Semivolatiles
by GCMS 8270

Client Sample ID: DP 536-0.5
Client Project ID: Kuhlman Electric
Lab Sample ID: 94447
Lab Project ID: G185-81
Matrix: Soil %Solids: 94.9

Date Collected: 8/26/00
Date Received: 9/1/00
Date Analyzed: 9/12/00
Analyzed By: MRC
Dilution: 1

Compound	Quantitation Limit (ug/KG)	Result (ug/KG)
Acenaphthene	330	BQL
Acenaphthylene	330	BQL
Anthracene	330	BQL
Benzo[a]anthracene	330	**1100**
Benzo[a]pyrene	330	**1600**
Benzo[b]fluoranthene	330	**1900**
Benzo[g,h,i]perylene	330	**940**
Benzo[k]fluoranthene	330	**1300**
Benzoic Acid	650	BQL
Bis(2-chloroethoxy)methane	330	BQL
Bis(2-chloroethyl)ether	330	BQL
Bis(2-chloroisopropyl)ether	330	BQL
Bis(2-ethylhexyl)phthalate	330	BQL
4-bromophenyl phenyl ether	330	BQL
Butylbenzylphthalate	330	BQL
4-Chloroaniline	330	BQL
4-Chloro-3-methylphenol	330	BQL
2-Chloronaphthalene	330	BQL
2-Chlorophenol	330	BQL
4-Chlorophenyl phenyl ether	330	BQL
Chrysene	330	**1500**
Di-n-Butylphthalate	330	BQL
Di-n-octylphthalate	330	BQL
Dibenzo[a,h]anthracene	330	**360**
Dibenzofuran	330	BQL
1,2-Dichlorobenzene	330	BQL
1,3-Dichlorobenzene	330	BQL
1,4-Dichlorobenzene	330	BQL
3,3'-Dichlorobenzidine	650	BQL
2,4-Dichlorophenol	330	BQL
Diethylphthalate	330	BQL
2,4-Dimethylphenol	330	BQL
Dimethylphthalate	330	BQL
4,6-Dinitro-2-methylphenol	1600	BQL
2,4-Dinitrophenol	1600	BQL
2,4-Dinitrotoluene	330	BQL
2,6-Dinitrotoluene	330	BQL
Fluoranthene	330	**2800**
Fluorene	330	BQL
Hexachlorobenzene	330	BQL
Hexachlorobutadiene	330	BQL
Hexachlorocyclopentadiene	650	BQL
Hexachloroethane	330	BQL
Indeno(1,2,3-c,d)pyrene	330	**1100**
Isophorone	330	BQL

PARAGON ANALYTICAL LABORATORIES, INC.

Results for Semivolatiles
by GCMS 8270

Client Sample ID: DP 536-0.5
Client Project ID: Kuhlman Electric
Lab Sample ID: 94447
Lab Project ID: G185-81
Matrix: Soil %Solids: 94.9

Date Collected: 8/26/00
Date Received: 9/1/00
Date Analyzed: 9/12/00
Analyzed By: MRC
Dilution: 1

Compound	Quantitation Limit (ug/KG)	Result (ug/KG)
2-Methylnaphthalene	330	BQL
2-Methylphenol	330	BQL
3- & 4-Methylphenol	330	BQL
N-Nitrosodi-n-propylamine	330	BQL
N-Nitrosodiphenylamine	330	BQL
Naphthalene	330	BQL
2-Nitroaniline	330	BQL
3-Nitroaniline	330	BQL
4-Nitroaniline	330	BQL
Nitrobenzene	330	BQL
2-Nitrophenol	330	BQL
4-Nitrophenol	1600	BQL
Pentachlorobenzene	330	BQL
Pentachlorophenol	1600	BQL
Phenanthrene	330	**980**
Phenol	330	BQL
Pyrene	330	**2100**
1,2,3,4-Tetrachlorobenzene	330	BQL
1,2,3,5- & 1,2,4,5-Tetrachlorobenzene	330	BQL
1,2,3-Trichlorobenzene	330	BQL
1,2,4-Trichlorobenzene	330	BQL
1,3,5-Trichlorobenzene	330	BQL
2,4,5-Trichlorophenol	330	BQL
2,4,6-Trichlorophenol	330	BQL

Surrogate Spike Recoveries	Spike Added	Spike Result	Percent Recovered
2-Fluorobiphenyl	10	10.7	107
2-Fluorophenol	10	8.9	89
Nitrobenzene-d5	10	9.9	99
Phenol-d6	10	9.4	94
2,4,6-Tribromophenol	10	10.2	102
4-Terphenyl-d14	10	11.9	119

Comments:

Results are corrected for %solids and dilution where applicable.

Flags:

BQL = Below Quantitation Limit.

Reviewed By:

PARADIGM ANALYTICAL LABORATORIES, INC.

Results of Library Search for Semivolatile Compounds

by GCMS

Client Sample ID: DP 536-0.5
Client Project ID: Kuhlman Electric
Lab Sample ID: 94447
Lab Project ID: G185-81
Matrix: Soil %SOLIDS 94.9

Date Collected: 8/26/00
Date Received: 9/1/00
Date Analyzed: 9/12/00
Analyzed By: MRC
Dilution: 1

Num.	Compound	CAS#	Match Probability	Result (ug/KG)
1	Aromatic, Unknown			1400
2	Alkane, Unknown			1200
3	Alkane, Unknown			1100
4	Alkane, Unknown			630
5	Unknown			520
6	Aromatic, Unknown			370
7	Aromatic, Unknown			330
8	Unknown			320
9	Unknown			300
10	Alcohol, Unknown			300

Comment:

Tentatively Identified Compound (TIC) refers to substances which are not present in the list of target compounds. Therefore, not all TICs are identified and quantitated using individual standards. TIC listings are prepared utilizing a computerized library search of electron impact mass spectral data and evaluation of the relevant data by a mass spectral data specialist.

Quantitation is accomplished by relative peak height of the compound compared to that of the nearest internal standard from the total ion chromatogram. TICs are identified and quantitated only if the peak height is equal to or greater than 10% of that of the nearest internal standard. Quantitation provided is an estimate.

Reviewed by: MJ

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

PARAGM ANALYTICAL LABORATORIES, INC.

Results for PCBs
by EPA 8082

Client Sample ID: DP 559-0.5'
Client Project ID: Kuhlman Electric
Lab Sample ID: 94196
Lab Project ID: G185-80
Matrix: Soil %SOLIDS: 90.0

Date Collected: 8/26/00
Date Received: 8/29/00
Date Analyzed: 9/13/00
Analyzed By: CLP
Dilution: 5

Compound	Quantitation Limit (ug/KG)	Result (ug/KG)
Arochlor-1016	240	BQL
Arochlor-1221	240	BQL
Arochlor-1232	240	BQL
Arochlor-1242	240	BQL
Arochlor-1248	240	BQL
Arochlor-1254	240	BQL
Arochlor-1260	240	**3500**
Arochlor-1262	240	BQL

Surrogate Spike Recoveries	Spike Added	Spike Result	Percent Recovered
TCMX	100	55	55

*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:

PARAGON ANALYTICAL LABORATORIES, INC.

Results for Semivolatiles
by GCMS 8270

Client Sample ID: DP 559-0.5'
Client Project ID: Kuhlman Electric
Lab Sample ID: 94196
Lab Project ID: G185-80
Matrix: Soil %Solids: 90.0

Date Collected: 8/26/00
Date Received: 8/29/00
Date Analyzed: 9/7/00
Analyzed By: MRC
Dilution: 1

Compound	Quantitation Limit (ug/KG)	Result (ug/KG)
Acenaphthene	390	BQL
Acenaphthylene	390	BQL
Anthracene	390	BQL
Benzo[a]anthracene	390	**580**
Benzo[a]pyrene	390	**750**
Benzo[b]fluoranthene	390	**1000**
Benzo[g,h,i]perylene	390	BQL
Benzo[k]fluoranthene	390	**720**
Benzoic Acid	780	BQL
Bis(2-chloroethoxy)methane	390	BQL
Bis(2-chloroethyl)ether	390	BQL
Bis(2-chloroisopropyl)ether	390	BQL
Bis(2-ethylhexyl)phthalate	390	**780**
4-bromophenyl phenyl ether	390	BQL
Butylbenzylphthalate	390	BQL
4-Chloroaniline	390	BQL
4-Chloro-3-methylphenol	390	BQL
2-Chloronaphthalene	390	BQL
2-Chlorophenol	390	BQL
4-Chlorophenyl phenyl ether	390	BQL
Chrysene	390	**740**
Di-n-Butylphthalate	390	BQL
Di-n-octylphthalate	390	BQL
Dibenzo[a,h]anthracene	390	BQL
Dibenzofuran	390	BQL
1,2-Dichlorobenzene	390	BQL
1,3-Dichlorobenzene	390	BQL
1,4-Dichlorobenzene	390	BQL
3,3'-Dichlorobenzidine	780	BQL
2,4-Dichlorophenol	390	BQL
Diethylphthalate	390	BQL
2,4-Dimethylphenol	390	BQL
Dimethylphthalate	390	BQL
4,6-Dinitro-2-methylphenol	1900	BQL
2,4-Dinitrophenol	1900	BQL
2,4-Dinitrotoluene	390	BQL
2,6-Dinitrotoluene	390	BQL
Fluoranthene	390	**1300**
Fluorene	390	BQL
Hexachlorobenzene	390	BQL
Hexachlorobutadiene	390	BQL
Hexachlorocyclopentadiene	780	BQL
Hexachloroethane	390	BQL
Indeno(1,2,3-c,d)pyrene	390	BQL
Isophorone	390	BQL

Results for Semivolatiles
by GCMS 8270

Client Sample ID: DP 559-0.5'
Client Project ID: Kuhlman Electric
Lab Sample ID: 94196
Lab Project ID: G185-80
Matrix: Soil %Solids: 90.0

Date Collected: 8/26/00
Date Received: 8/29/00
Date Analyzed: 9/7/00
Analyzed By: MRC
Dilution: 1

Compound	Quantitation Limit (ug/KG)	Result (ug/KG)
2-Methylnaphthalene	390	BQL
2-Methylphenol	390	BQL
3- & 4-Methylphenol	390	BQL
N-Nitrosodi-n-propylamine	390	BQL
N-Nitrosodiphenylamine	390	BQL
Naphthalene	390	BQL
2-Nitroaniline	390	BQL
3-Nitroaniline	390	BQL
4-Nitroaniline	390	BQL
Nitrobenzene	390	BQL
2-Nitrophenol	390	BQL
4-Nitrophenol	1900	BQL
Pentachlorobenzene	390	BQL
Pentachlorophenol	1900	BQL
Phenanthrene	390	BQL
Phenol	390	BQL
Pyrene	390	1100
1,2,3,4-Tetrachlorobenzene	390	BQL
1,2,3,5- & 1,2,4,5-Tetrachlorobenzene	390	BQL
1,2,3-Trichlorobenzene	390	BQL
1,2,4-Trichlorobenzene	390	BQL
1,3,5-Trichlorobenzene	390	BQL
2,4,5-Trichlorophenol	390	BQL
2,4,6-Trichlorophenol	390	BQL

Surrogate Spike Recoveries	Spike Added	Spike Result	Percent Recovered
2-Fluorobiphenyl	10	10	100
2-Fluorophenol	10	7.1	71
Nitrobenzene-d5	10	9.9	98
Phenol-d6	10	9.3	93
2,4,6-Tribromophenol	10	7.3	73
4-Terphenyl-d14	10	12.6	126

Comments:

Results are corrected for %solids and dilution where applicable.

Flags:

BQL = Below Quantitation Limit.

Reviewed By:

PARAGON ANALYTICAL LABORATORIES, INC.

Results of Library Search for Semivolatile Compounds

by GCMS

Client Sample ID: DP 559-0.5'
Client Project ID: Kuhlman Electric
Lab Sample ID: 94196
Lab Project ID: G185-80
Matrix: Soil %SOLIDS 90.0

Date Collected: 8/26/00
Date Received: 8/29/00
Date Analyzed: 9/6/00
Analyzed By: MRC
Dilution: 1

Num.	Compound	CAS#	Match Probability	Result (ug/KG)
1	Alkane, Unknown			1900
2	Alkane, Unknown			1600
3	Carboxylic Acid, Unknown			1000
4	Aromatic, Unknown			770
5	Unknown			310
6	Unknown			280
7	Unknown			190
8	Unknown			160
9				
10				

Comment:

Tentatively Identified Compound (TIC) refers to substances which are not present in the list of target compounds. Therefore, not all TICs are identified and quantitated using individual standards. TIC listings are prepared utilizing a computerized library search of electron impact mass spectral data and evaluation of the relevant data by a mass spectral data specialist.

Quantitation is accomplished by relative peak height of the compound compared to that of the nearest internal standard from the total ion chromatogram. TICs are identified and quantitated only if the peak height is equal to or greater than 10% of that of the nearest internal standard. Quantitation provided is an estimate.

Reviewed by: _____

PARADIGM ANALYTICAL LABORATORIES, INC.

Results for PCBs
by EPA 8082

Client Sample ID: HA 593-0.5
Client Project ID: Kuhlman Electric
Lab Sample ID: 94445
Lab Project ID: G185-81
Matrix: Soil %SOLIDS: 99.3

Date Collected: 8/29/00
Date Received: 9/1/00
Date Analyzed: 9/13/00
Analyzed By: CLP
Dilution: 10

Compound	Quantitation Limit (ug/KG)	Result (ug/KG)
Arochlor-1016	1500	BQL
Arochlor-1221	1500	BQL
Arochlor-1232	1500	BQL
Arochlor-1242	1500	BQL
Arochlor-1248	1500	BQL
Arochlor-1254	1500	BQL
Arochlor-1260	1500	3800
Arochlor-1262	1500	BQL

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

*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:

PARAGON ANALYTICAL LABORATORIES, INC.

Results for Semivolatiles
by GCMS 8270

Client Sample ID: HA 593-0.5
Client Project ID: Kuhlman Electric
Lab Sample ID: 94445
Lab Project ID: G185-81
Matrix: Soil %Solids: 99.3

Date Collected: 8/29/00
Date Received: 9/1/00
Date Analyzed: 9/11/00
Analyzed By: MRC
Dilution: 1

Compound	Quantitation Limit (ug/KG)	Result (ug/KG)
Acenaphthene	320	BQL
Acenaphthylene	320	BQL
Anthracene	320	BQL
Benzo[a]anthracene	320	BQL
Benzo[a]pyrene	320	BQL
Benzo[b]fluoranthene	320	BQL
Benzo[g,h,i]perylene	320	BQL
Benzo[k]fluoranthene	320	BQL
Benzoic Acid	640	BQL
Bis(2-chloroethoxy)methane	320	BQL
Bis(2-chloroethyl)ether	320	BQL
Bis(2-chloroisopropyl)ether	320	BQL
Bis(2-ethylhexyl)phthalate	320	BQL
4-bromophenyl phenyl ether	320	BQL
Butylbenzylphthalate	320	BQL
4-Chloroaniline	320	BQL
4-Chloro-3-methylphenol	320	BQL
2-Chloronaphthalene	320	BQL
2-Chlorophenol	320	BQL
4-Chlorophenyl phenyl ether	320	BQL
Chrysene	320	BQL
Di-n-Butylphthalate	320	BQL
Di-n-octylphthalate	320	BQL
Dibenzo[a,h]anthracene	320	BQL
Dibenzofuran	320	BQL
1,2-Dichlorobenzene	320	BQL
1,3-Dichlorobenzene	320	BQL
1,4-Dichlorobenzene	320	BQL
3,3'-Dichlorobenzidine	640	BQL
2,4-Dichlorophenol	320	BQL
Diethylphthalate	320	BQL
2,4-Dimethylphenol	320	BQL
Dimethylphthalate	320	BQL
4,6-Dinitro-2-methylphenol	1600	BQL
2,4-Dinitrophenol	1600	BQL
2,4-Dinitrotoluene	320	BQL
2,6-Dinitrotoluene	320	BQL
Fluoranthene	320	BQL
Fluorene	320	BQL
Hexachlorobenzene	320	BQL
Hexachlorobutadiene	320	BQL
Hexachlorocyclopentadiene	640	BQL
Hexachloroethane	320	BQL
Indeno(1,2,3-c,d)pyrene	320	BQL
Isophorone	320	BQL

PARADIGM ANALYTICAL LABORATORIES, INC.

Results for Semivolatiles
by GCMS 8270

Client Sample ID: HA 593-0.5
Client Project ID: Kuhlman Electric
Lab Sample ID: 94445
Lab Project ID: G185-81
Matrix: Soil %Solids: 99.3

Date Collected: 8/29/00
Date Received: 9/1/00
Date Analyzed: 9/11/00
Analyzed By: MRC
Dilution: 1

Compound	Quantitation Limit (ug/KG)	Result (ug/KG)
2-Methylnaphthalene	320	BQL
2-Methylphenol	320	BQL
3- & 4-Methylphenol	320	BQL
N-Nitrosodi-n-propylamine	320	BQL
N-Nitrosodiphenylamine	320	BQL
Naphthalene	320	BQL
2-Nitroaniline	320	BQL
3-Nitroaniline	320	BQL
4-Nitroaniline	320	BQL
Nitrobenzene	320	BQL
2-Nitrophenol	320	BQL
4-Nitrophenol	1600	BQL
Pentachlorobenzene	320	BQL
Pentachlorophenol	1600	BQL
Phenanthrene	320	BQL
Phenol	320	BQL
Pyrene	320	BQL
1,2,3,4-Tetrachlorobenzene	320	BQL
1,2,3,5- & 1,2,4,5-Tetrachlorobenzene	320	BQL
1,2,3-Trichlorobenzene	320	BQL
1,2,4-Trichlorobenzene	320	BQL
1,3,5-Trichlorobenzene	320	BQL
2,4,5-Trichlorophenol	320	BQL
2,4,6-Trichlorophenol	320	BQL

Surrogate Spike Recoveries	Spike Added	Spike Result	Percent Recovered
2-Fluorobiphenyl	10	9.7	97
2-Fluorophenol	10	8.8	88
Nitrobenzene-d5	10	9.1	91
Phenol-d6	10	8.9	89
2,4,6-Tribromophenol	10	9.6	96
4-Terphenyl-d14	10	11.4	114

Comments:

Results are corrected for %solids and dilution where applicable.

Flags:

BQL = Below Quantitation Limit.

Reviewed By: _____

PARADIGM ANALYTICAL LABORATORIES, INC.

Results of Library Search for Semivolatile Compounds

by GCMS

Client Sample ID:	HA 593-0.5			Date Collected:	8/29/00
Client Project ID:	Kuhlman Electric			Date Received:	9/1/00
Lab Sample ID:	94445			Date Analyzed:	9/11/00
Lab Project ID:	G185-81			Analyzed By:	MRC
Matrix:	Soil	%SOLIDS	99.3	Dilution:	1

Num.	Compound	CAS#	Match Probability	Result (ug/KG)
1	Unknown			410
2	Unknown			400
3	Unknown			260
4	Unknown			210
5				
6				
7				
8				
9				
10				

Comment:

Tentatively Identified Compound (TIC) refers to substances which are not present in the list of target compounds. Therefore, not all TICs are identified and quantitated using individual standards. TIC listings are prepared utilizing a computerized library search of electron impact mass spectral data and evaluation of the relevant data by a mass spectral data specialist.

Quantitation is accomplished by relative peak height of the compound compared to that of the nearest internal standard from the total ion chromatogram. TICs are identified and quantitated only if the peak height is equal to or greater than 10% of that of the nearest internal standard. Quantitation provided is an estimate.

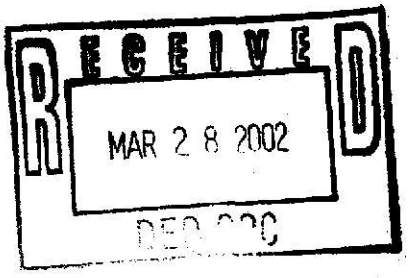
Reviewed by: _____

GeoEnvironmental Associates, LLC | MARTIN & SLAGLE

ROBERT L. MARTIN, LG
Principal Geologist

CHRISTINE E. SLAGLE
Principal Scientist

March 27, 2002



Mr. Tony Russell
Chief Uncontrolled Sites Section
Office of Pollution Control
Mississippi Department of Environmental Quality
P.O. Box 10385
Jackson, Mississippi 39289-0385

SUBJECT: Closure Reports for the Garment Shop, Frazier, Edwards, and Kellum Properties
Lee Avenue
Crystal Springs, Mississippi

Dear Mr. Russell:

Enclosed are two Closure Reports each for the referenced properties in Crystal Springs, Mississippi. Remediation of PCB contamination at each of the four properties is complete.

If you have any questions or comments, please contact me at (828) 669-3929.

Sincerely,
MARTIN & SLAGLE GEOENVIRONMENTAL ASSOCIATES, L.L.C

Robert L. Martin, L.G.
Principal Geologist

Attachments

cc.: Anastasia Hamel
Al Thomas
Tom Lupo
Scott Schang
Craig Brown
Chuck Peel

828.669.3929 • 828.669.5289 Fax
PO Box 1023 • 208 Sutton Avenue • Black Mountain NC 28711

SEYFARTH SHAW
ATTORNEYS

FILE COPY

55 East Monroe Street
Suite 4200
Chicago, IL 60603-5803
312-346-8000
fax 312-269-8869
www.seyfarth.com

Writer's direct phone
(312) 269-8889
Writer's e-mail
dupo@seyfarth.com

February 21, 2001

PERSONAL & CONFIDENTIAL

VIA EMAIL AND FACSIMILE (601) 355-3048

Mary E. McAlister, Esq.
David Nutt & Associates, P.C.
1226 North State Street
P.O. Box 1039
Jackson, Mississippi 39215-1039

Dear Ms. McAlister:

Thank you for your email message of February 12, 2001 in response to my phone call concerning your representation of various residential property owners in the area of the Kuhlman Electric Corporation plant ("KEC") in Crystal Springs, Mississippi. In that message you committed to share your clients' identities, including initially those properties adjacent to the plant and the related drainage ditch directed toward Lake Chautauqua, advising whether you and your clients have completed and shared all sampling results for your clients' properties, and thereafter accordingly authorizing access to perform any remediation and restoration efforts deemed necessary in conjunction with applicable law.

As you know, BorgWarner, as indemnitor of KEC for various aspects of historical contamination at the plant, was already in the field and fully prepared to address the Callums' and Edwards' properties, with the Mississippi Department of Environmental Quality's ("MDEQ") approval and oversight, in October 2000. However, as stated in MDEQ's November 8, 2000 letter to your colleague and co-counsel, Douglas G. Mercier, the intervening sampling events forced MDEQ and BorgWarner to demobilize efforts to address these properties and to focus on properties around them and other aspects of this project.

As we have discussed, BorgWarner remains committed to promptly addressing the residential properties along the plant and the drainage ditch with MDEQ's input, direction and approval. However, as of February 21, 2001, we have not yet received your letter on the foregoing topics. Please provide the requested information in writing, along with any past and current sampling results and notice of pending or future sampling events and results so that we may work with MDEQ to re-schedule your

SEYFARTH SHAW
ATTORNEYS

clients' properties for remediation and restoration as the area dries out, further delineation is completed, and the ditch is emptied and stabilized as the spring rainy season ends.

We look forward to and are committed to working with you on good faith efforts to address these issues as smoothly and sensibly as possible under the circumstances, with the early priority of addressing the residential properties, such as your clients. Your prompt response will be appreciated and will greatly advance this process.

Very truly yours,

SEYFARTH SHAW

By: Thomas D. Lupo

TDL:cyn
10211448

cc: Kelli M. Dowell, Esq.
Gretchen Zmitrovich
Anastasia Hamel
Scott E. Schang, Esq.

BorgWarner Inc. 200 South Michigan Avenue Chicago Illinois 60604 Telephone 312 322 8500

AH-00-1638

VIA UPS NEXT DAY AIR

BorgWarner

December 20, 2000

Anastasia Hamel
Director, Environmental Programs
BorgWarner Inc.
11955 East Nine Mile Road
Warren, Michigan 48089

Ms. Gretchen Zmitrovich
Mississippi Department of Environmental Quality
Office of Pollution Control
101 West Capitol Street
Jackson, Mississippi 39201

Re: **Progress Report of Assessment and Remediation Activities**
Kuhlman Electric Corporation and Residential Properties
Crystal Springs, Mississippi

Dear Ms. Zmitrovich:

This is a progress report to summarize the assessment and remediation activities related to PCB contamination at Crystal Springs, Mississippi. BorgWarner's last update was October 31, 2000. As you are aware, pursuant to the indemnity agreement between Kuhlman Electric Corporation (KEC) and BorgWarner Inc., BorgWarner has continued the assessment at the KEC plant and began the assessment of residential properties along a drainage channel downgradient of the plant. BorgWarner has also been actively remediating those properties adjacent to the KEC plant for which access was previously granted and sampling was complete.

BorgWarner, as it stated in its October 31, 2000 letter to the Mississippi Department of Environmental Quality (MDEQ), remains committed to working closely with MDEQ, USEPA, local government and KEC in a cooperative manner to accomplish the tasks necessary for the protection of human health and the environment, to the extent that the circumstances are covered by its contractual indemnity to KEC. BorgWarner will continue to seek MDEQ's guidance and direction in its current and future intended activities and to promptly share information.

ACTIONS TAKEN AND PLANNED

1. Delineation of Residential Properties along Jackson and Lee Avenues

BorgWarner promptly and voluntarily began sampling and delineation activities at the residential and commercial properties, adjoining the KEC plant that appeared to or reportedly have been affected by runoff or by the removal of soil from the KEC plant prior to October 6, 1999.

Under MDEQ's supervision, BorgWarner conducted delineation activities of these properties during the month of August, 2000. A total of eighteen (18) properties were investigated, which were:

1. Perry Smith, 219 North Jackson Street
2. Stringer Funeral Home, 301 North Jackson Street
3. Stringer Rental Property, 303 North Jackson Street
4. Harold and Suzanne Warren, 403 North Jackson Street
5. Elnor Wright, 401 North Jackson Street
6. Sonny Reeves, 405 North Jackson Street
7. Brent Property, 403 Lee Avenue
8. Louie Lang/David Vinson, 407 North Jackson Street
9. Jerry Youngblood, 100 Lamar St.
10. Medical Clinic, Lee Avenue
11. Edwards Property, 406 Lee Avenue
12. Garment Shop, 414 Lee Avenue
13. Frazier Property, 405 Lee Avenue
14. Duplex Property, 408/410 Lee Avenue
15. Kellum Property, 412 Lee Avenue
16. Dabney/Smith Property, 215 North Jackson
17. Cooper Property, 409 North Jackson
18. Larry and Carol Wright, 305 North Jackson

BorgWarner acted under the continuous guidance and direction of the MDEQ with respect to delineation activities at the residential and commercial properties adjoining the KEC plant. Split samples were analyzed and QA/QC procedures were implemented by two laboratories experienced with polychlorinated biphenyl analysis. Samples were frequently split with on-site MDEQ representatives for MDEQ's independent analysis, which to our knowledge consistently correlated with BorgWarner's on-site and off-site laboratory analytical results.

The delineation activities were conducted utilizing the " US EPA, Region IV Environmental Investigations Standard Operating Procedures and Quality Assurance Manual," May 1996 (EISOPQAM), sampling and analytical protocols. A copy of the work plan with procedures used in the field and applicable sections of the EISOPQAM are attached to this report for reference purposes.

Upon completing the delineation activities, BorgWarner compiled and submitted the analytical results on October 2, 2000 to MDEQ and US EPA, Region IV. Subsequently, BorgWarner began to schedule the remediation of residential and commercial properties adjacent to the KEC plant and along Jackson and Lee Avenues for which access was granted with the assistance of MDEQ and City of Crystal Springs Mayor Webb and where an attorney and/or an independent consultant were not involved in performing conflicting sampling activities.

2. Remediation of Residential Properties

On October 16, 2000 BorgWarner initiated remediation activities at the Medical Center and the Dabney/Smith properties, which are adjacent to the KEC plant. Remediation of the Newman Duplex, on Lee Avenue, began on November 30, 2000. Remediation of these properties involved excavation and disposal of all soil containing 1.0 part per million (ppm) or greater of PCBs in accordance with MDEQ's established clean-up criteria for residential properties. All soils containing greater than 1 ppm PCBs but less than 50 ppm PCBs were profiled and disposed of at the BFI's "Little Dixie" Subtitle D Landfill in Madison County, Mississippi after MDEQ and US EPA, Region IV 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. As a result, the remediation and confirmation of clean-up standards established by MDEQ guidance were adopted and implemented in all of BorgWarner's residential remediation activities. A grid with ten-foot (10) sampling point centers was used to confirm that impacted soils had been removed at each site.

The remediation of the Dabney/Smith, the Medical Center and the Newman duplex property resulted in the removal of 1400 tons of soil, which was disposed of at the BFI "Little Dixie" Subtitle D Landfill and replaced with 1500 tons of certified clean soil. During the remediation activities, the on-site laboratory analyzed 324 soil samples in the month of November and the fixed-base laboratory analyzed 32 quality control samples.

Vegetation, such as live oak trees, was treated with specialty equipment for maximum protection and to minimize damage to the root systems. Soil surrounding the live oak tree roots was removed using an "Air Shovel"™, a unique technology adopted specifically for this purpose. The Air Shovel™ uses a pressure spray to dislodge soil from around the roots while a vacuum system removes the soil and water by vacuuming into a tank. This method of soil removal has performed effectively with minimal damage to the tree's root system as was confirmed by the landscaping contractor and arborist. However, this process, regardless of its effectiveness, is very tedious and as a result only the tree on the Dabney/Smith property was completed during the second half of November. One other live oak tree, located on the Medical Center property, remains to be treated in a similar fashion and is scheduled for January 2001.

Landscaping and replacement of structures (sheds, car ports, etc.) on both the Medical Center and the Dabney/Smith properties are continuing and will most likely be completed by the end of December 2000. Both properties have been surveyed and the fence between the Dabney/Smith and Medical Center properties is currently being re-installed. Landscaping has been completed on the Newman duplex property.

Third party independent sampling activities commissioned by the Nutt & Associates Law Firm have interfered with planned remediation activities along Lee Avenue, specifically at the Frazier's, Edward's, and Kellum's properties. The Garment Shop is a more complicated matter for two reasons. First, the impacted soil at the Garment Shop is located at the property line between it and the Kellum residence and second, the Kellum elm tree roots extend to the Garment Shop property itself. BorgWarner has filed a Freedom of Information Act request to MDEQ in an effort to obtain a copy of the recently submitted report generated by these independent parties.

BorgWarner, after its evaluation of the sampling results and data contained within the third party report, will begin discussions with the attorney(s) representing each resident (mentioned above) along Lee Avenue in an attempt to resolve the matter, including confirmation that all sampling results have been disclosed, and whether further sampling is necessary, and confirm access to then remediate those properties. BorgWarner also plans to keep MDEQ appraised of any developments and any progress or if no progress is being made with the attorney(s) involved.

BorgWarner will schedule delineation activities for the Gas Station, which is at the corner of Lee Avenue next to the Garment Shop, Mayor Webb's residence and the drainage pathway to the south. BorgWarner will inform MDEQ of the timing for those activities.

3. Drainage Channel Properties

Beginning on October 30th through the end of November, BorgWarner collected and analyzed soil samples from nine properties situated along the drainage channel leading from the north side of KEC's plant site to Lake Chautauqua. The properties were:

1. Sojourner Property, 111 M^{c}Pherson Street
2. Weathersby Property, 101 Forest Street
3. Robert Williams Property (Lonnie Williams' residence), 103 Forest Street
4. Flossie M^{c}Murray Property (Ralph Williams residence), 104 Forest Street
5. Ralph Williams Rental Property, 107 Forest Street
6. Richard Williams Property, 102 Forest Street
7. Roberta Fitzgerald Estate Property, (R.P Edwards point of contact) 108 Tucker Street Property currently is being rented to the Kendrick family.
8. Welch Property, 501 Camp Street
9. Orister Harris Property, 311 West Railroad Avenue

A total of 650 soil samples was collected from these properties and analyzed by the on-site laboratory. The fixed-base laboratory analyzed an additional 65 samples for confirmation and quality control purposes. These preliminary assessment activities were conducted in the same manner as the Kuhlman plant preliminary site assessment and the KEC plant adjacent residential properties; and utilizing the "EPA, Region IV Environmental Investigations Standard Operating

Procedures and Quality Assurance Manual", May 1996 (EISOPQAM), sampling and analytical protocols.

Preliminary results available at this time indicate that six of the nine properties that were sampled will require certain remediation. Four properties, including the Sojourner, Williams' rental, Harris and Welch properties, will require remediation under the MDEQ guidelines since the highest concentrations detected are less than 50 ppm. Two properties, including the M&Murray and R. P. Edwards properties, have soil with PCB concentrations greater than 50 ppm and therefore will require remediation under the TSCA rules. The following is a list of properties where concentrations greater than 1.0 ppm PCB were detected as well as the highest detected concentration on each property:

Property	Highest Detected Concentration
Sojourner	2.6 ppm
Williams rental	30.0 ppm
Harris	1.2 ppm
Welch	8.4 ppm
M&Murray	70.0 ppm
R. P. Edwards	51.0 ppm

Data from this sampling event are being evaluated and once quality control measures are completed the data will be tabulated. Site-specific reports containing collected data, maps of sampling locations, and work plans for remediation, if required, for each individual site are also being prepared and will be submitted to MDEQ and US EPA, Region IV by January 12, 2001.

It is anticipated that additional sampling will be required along the drainage channel. Several undeveloped properties, either abutting the drainage channel or through which the drainage channel runs, will be sampled to delineate the extent of possibly impacted soil and determine the potential for future runoff to Lake Chautauqua. The Department will be kept appraised as to the timing for this additional investigation and sampling activity.

4. KEC Plant

After an initial phase of sampling in the areas identified by KEC's construction activities and the related equipment decontamination zone, BorgWarner conducted further, substantial sampling activities in the south and north parking lot areas as well as the former above ground storage tank area. These delineation activities, other than any possible data gaps, have been completed. The results are currently being tabulated and compared for correlation purposes between the on-site and off-site laboratories, prior to being issued to MDEQ. Should any data gaps exist, BorgWarner will conduct further sampling activities.

This additional data will be incorporated as an addendum to the *Preliminary Site Assessment Report*, submitted to MDEQ in July 2000. Comments to the *Preliminary Site Assessment Report* made by MDEQ will also be addressed and included in the addendum submittal. It is anticipated that the addendum report will be submitted to MDEQ by February 12, 2001.

5. Lake Chautauqua

BorgWarner intends to consider delineation of the sediments at Lake Chautauqua, ecological assessment, and surface water sampling, to the extent appropriate after receipt of the pending "Task Force" report. These activities will not begin on any great scale until the Task Force report is evaluated.

6. Groundwater Delineation

BorgWarner intends to delineate the nature and extent of any groundwater contamination relative to the KEC plant. Groundwater delineation will take place at the time that remediation at the KEC plant commences. It is critical that the protective cover at the KEC plant site is not disturbed for the time being and that the groundwater investigation is addressed when BorgWarner is actively remediating on the KEC plant property. This approach will ensure that sediments from the KEC Plant do not travel to the drainage channel and Lake Chautauqua.

BorgWarner remains dedicated to continuing its open communication with MDEQ and US EPA, Region IV and looks forward to the meeting with MDEQ and City of Crystal Springs Mayor Webb and other Crystal Springs representatives on January 17, 2001 (at 8:30 a.m.) to further discuss any of the above and share its plans for future activities.

Should you have any questions or comments, please contact me directly at (810) 497-4503 at your earliest convenience.

Very truly yours,

Anastasia Hamel

Anastasia Hamel
Director, Environmental Programs
BorgWarner Inc.

Attachments:

1. Work Plan – Preliminary Assessment and Remediation
2. Craig Brown, US EPA, Region IV letter to BFI

cc: J. Banks, MDEQ
T. Russell, MDEQ
K. Dowell, Esq., MDEQ
C. Brown, US EPA Region IV
H. Webb, Mayor Crystal Springs
Laurene H. Horiszny, Esq.
Robert Martin, MSGA
Thomas D. Lupo, Esq.
Scott E. Schang, Esq.
Mickey Crockett, KEC
Al Thomas, KEC

WORKPLAN FOR THE PRELIMINARY ASSESSMENT AND REMEDIATION OF PCB CONTAMINATION IN SOIL KUHLMAN ELECTRIC CORPORATION FACILITY AND RESIDENTIAL COMMERCIAL PROPERTIES IN CRYSTAL SPRINGS, MISSISSIPPI

As established by the Mississippi Department of Environmental Quality (MDEQ) guidelines in connection with this project, all work related to the preliminary assessment of the extent of contamination at the Kuhlman Electric Corporation (KEC) facility and work related to the preliminary assessment and confirmation of remedial actions at KEC adjacent residential/commercial properties and residential properties along the drainage channel (leading from the north side of KEC's facility to Lake Chautauqua) has been performed in accordance with the *Environmental Protection Agency (EPA), Region IV "Environmental Investigations, Standard Operating Procedures and Quality Assurance Manual", May 1996 (EISOPQAM).*

Copies of relevant and applicable portions of the EISOPQAM are maintained on site during all field activities and all field personnel are trained in its implementation. Remedial action confirmation sampling grids were established using *MDEQ Guidance Document, Verification of Soil Remediation, Environmental Response Division, Waste Management Division, April 1994, Revision 1.* Specifically, sampling grids were based on Part 2-Medium and Large Site Soil Cleanup Verification, "Establishing Grid Interval."

Field operations were performed under the site-specific Health and Safety Plan guidelines. Modified Level "D" Personal Protective Equipment (PPE) was utilized by all personnel working within the investigative area.

Sampling Objectives

The soil-sampling objective is to establish the vertical and horizontal extent of contamination resulting from historical facility operations. In the KEC facility case, the soil-sampling objective included historical use of polychlorinated biphenyl (PCB). All sampling procedures were conducted in accordance with the US EPA, Region IV EISOPQAM. Sampling procedures included the collection of soil samples on a twenty foot triangular grid, where possible, at discreet depth intervals. Surface and subsurface soil samples were collected using GeoProbe® MacroProbe™ direct push sampling equipment. The GeoProbe® system uses a hydraulically driven hammer to advance a hollow, split-barrel sampler to the desired depth. The sampler contains an acetate liner in which a sample of the cored soil is retained. The MacroProbe™ corer retains a 1.25-inch diameter continuous 4 feet in length core sample. Once sampling is completed, the direct-push boring holes are backfilled with bentonite chips in unpaved areas, and with grout in parking lots and other paved areas.

Throughout the delineation activities each direct-push boring was sampled at 0.5-3.0 feet below ground surface (bgs) and at 3.0-6.0 feet bgs. Selected borings were completed to depths varying from 8-12 feet bgs and sampled in these deeper intervals to evaluate the vertical distribution of contaminants.

Additional sampling of dust, stream and drainage ditch sediments, surface water and ground water were collected, as warranted, in accordance with applicable EISOPQAM guidelines.

Analytical Methods

Samples that were collected were analyzed for PCBs by the on-site mobile laboratory, Environmental Chemistry Consulting Services (ECCS) of Madison, Wisconsin. Initially soil samples were also analyzed for chlorinated benzenes until data confirmed that chlorinated benzene contamination is not at issue in samples with low concentrations of PCBs (generally <20 ppm). At least 10% of all samples were split and sent to a fixed-base laboratory, Paradigm Analytical Laboratories, Inc. (PAL) of Wilmington, North Carolina for analysis of the same parameters as for the on-site mobile laboratory to corroborate the results of laboratory analyses for quality control and quality assurance measures. Both the on-site and fixed-base laboratories used the same standard EPA approved analytical methods. PCBs were analyzed by Modified Environmental Protection Agency (EPA) Method 8080/81 and chlorinated benzene compounds were analyzed by EPA Method 8270. Volatile organic compounds (VOCs) were analyzed by EPA Method 8260 for samples suspected of being impacted by other industrial processes solvents unrelated to PCBs. Select soil samples were also analyzed for silver, by EPA Method 6010B, and cyanide, by EPA Method 9012A.

Surface water samples were analyzed by PAL for PCBs using EPA Method 8080/81. Semivolatile organic compounds (SVOCs) were analyzed by EPA Method 8270, Volatile Organic Compounds (VOCs) were analyzed by EPA Method 8260, silver by EPA Method 6010B, and cyanide using Standard Method 4500 Cn-E. Perched ground water was analyzed for PCBs, SVOCs, and VOCs by the same methods as indicated above for surface water.

Quality Control

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

Project Manager:	Mr. Robert Martin, Martin & Slagle GeoEnvironmental Associates, LLC
Duties:	Responsible for management of project including all field coordination efforts.
Field Sample Custodian:	Mr. Robert Martin, Christine Slagle, Martin & Slagle GeoEnvironmental Associates, LLC
Duties:	Maintaining custody of samples, completing sample labels, Chain-of-Custody record.
Field Team Leader:	Mr. Robert Martin, Martin & Slagle GeoEnvironmental Associates, LLC
Duties:	Responsible for all activities related to the collection of samples.
Samplers:	Tim Fitzpatrick, Christine Slagle, Robert Martin
Duties:	Individuals responsible for the actual collection of samples.
Laboratory Sample Custodian:	Mr. Michael Linskens, ECCS Mr. Nicolas Schertz, ECCS Ms. Erin Staagard, PAL
Duties:	Individuals responsible for accepting custody of samples from the field sample custodian.

Quality Assurance Objectives for Data

Data for this project is being generated by two separate entities. The on-site data is generated by ECCS in their mobile laboratory. The fixed-base laboratory, PAL in Wilmington, North Carolina, generates the analytical results for the split samples.

The data quality objectives are pre-defined for the ECCS data in that Mississippi considers all mobile lab data screening level data. ECCS uses the same equipment and methodology as the fixed-base laboratories with the exception of the mini-extraction modification. Mobile laboratory data is validated by comparison of a minimum of 10% split samples with PAL. Following this procedure, the data qualifies as screening data with definitive confirmation under US EPA, Region IV EISOPQAM guidelines.

All samples sent to PAL were collected as follows: The sample was transferred from the GeoProbe® clean, unused, acetate sample liner into the labeled 4 ounce (oz) amber glass soil jar. The sample jar was then transferred to the mobile lab where ECCS personnel homogenized the sample prior to taking an aliquot for analysis. Due to the limited sample volume required by the ECCS mini-extraction and the low volatility of the chemicals of concern, the initial sampling jar was resealed (after ECCS personnel removed the amount of sample needed for their analysis), refrigerated and then sent to PAL; meaning PAL analyzed the sample from the exact same sample jar as ECCS.

Equipment rinsate samples were collected for evaluation of cross-contamination potential from ineffective decontamination procedures. These were prepared by pouring distilled water over the sampling equipment after decontamination and collecting and preserving the rinsate that was generated. Equipment rinseate samples were collected in accordance with the EPA, Region IV EISOPQAM guidelines.

Field blank samples were collected by filling sampling containers that were kept in the transition zone with distilled water. Field blanks determine the presence of ambient contaminants that may not be directly related to concentrations of contaminants in the sample media.

Blind duplicate soil samples were collected for analysis and sent to both laboratories. Blind duplicates were collected by homogenizing an aliquot of sample in a disposable plastic container and splitting the homogenized sample into two containers. After ECCS took their aliquot of these samples, the remainder of the sample was sent to PAL for analysis.

SAMPLE CONTROL AND FIELD RECORDS

Sample Identification

All samples sent to PAL for analysis conform to the labeling requirements under section 3.2.1 of the EISOPQAM.

8.3.1 Chain of Custody Procedures

Samples were logged as they were collected from the geoprobe liners. Date, time and sample litholgy were recorded on each log. Samples were then transferred to 4 oz amber glass jars and the jars transferred to a small sample cooler, which was taken to the mobile lab by field personnel in charge of sample handling. Sample identification (ID), date and time sampling occurred were recorded in the field logbook before transferring the samples to the mobile lab. Upon arrival at the mobile lab, the samples were transferred to the ECCS sample custodian who logged each sample on ECCS chain of custody forms. Each sample was assigned a unique ECCS internal ID number for tracking purposes. After analysis, the samples were transferred to either a sample refrigerator in the mobile lab or stored in coolers with ice until they were either shipped to PAL for confirmation analysis or readied for disposal. For samples sent to PAL, a new chain of custody form was completed by field personnel in charge of sample handling.

8.3.2 Field Records

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

8.4 Analytical Procedures

For analysis of samples in the field, ECCS used EPA Method 8082m, modified for quantitation of chlorinated benzenes and the mini extraction procedure.

PAL used EPA Method 8082 for quantitation of PCBs. For chlorinated benzenes, it used EPA Method 8270. While Method 8270 does not cover all the chlorinated benzenes, it provides confirmation of the ones it does detect and has the added benefit of supplying an analysis of a broad range of other semivolatile organic compounds.

For the analysis of cyanide EPA Method 9012A was employed and for silver EPA Method 6010B.

Selected samples were analyzed by EPA Method 8260, primarily to confirm that volatile organic compounds were not present in the samples or part of the site contaminants.

8.5 Laboratory Quality Assurance/Quality Control (QA/QC)

QA/QC procedures for both labs were found to be virtually identical. Summaries of each laboratory procedures follow.

ECCS:

- Continuous calibration standards analyzed every ten samples or less and at the end of a run.
- Blank samples and laboratory control samples (LCS) analyzed every twenty samples or less with a minimum of one per day.
- Matrix Spike/Matrix Spike Duplicate (MS/MSD) samples analyzed every twenty samples or less with a minimum of one per day.

PAL:

- Continuous calibration standards analyzed at least once every 12 hour shift plus a minimum of every 20 samples gas chromatography/mass spectroscopy (GC/MS) criteria follows method specific tuning requirements per EPA Method 8270.
- Blank and LCS samples analyzed every 20 samples or less with a minimum of one per day.
- MS/MSD samples analyzed every 20 samples or less with a minimum of one per day.

8.6 Data Validation and Reporting

As discussed in section 8.2, the primary validation of the ECCS data was accomplished through comparison with the data from PAL.

Since Hexachlorobenzene and 1,2,4-Trichlorobenzene are the only chlorinated benzenes on the standard Method 8270 list, these two compounds and total PCBs were the parameters tracked for the data validation procedure.

Overall, the correlation to this point of the investigation and remediation activities has been excellent with the majority of sample splits showing Relative Percent Differences (RPDs) of less than 100. Considering the inherent variability of soil as a matrix, achieving 93% acceptable split data spanning several orders of magnitude of concentration serves to justify the use of the on-site data as definitive quality.

SEYFARTH SHAW
ATTORNEYS

FILE COPY

55 East Monroe Street
Suite 4200
Chicago, IL 60603-5803
312-346-8000
fax 312-269-8869
www.seyfarth.com

Writer's direct phone
312/269-8889
Writer's e-mail
tlupo@seyfarth.com

November 6, 2000

Douglas G. Mercier, Esq.
357 Towne Center Boulevard
Suite 203
Ridgeland, Mississippi 39157

Re: Kellums' property located at 412 Lee Avenue, Crystal Springs, Mississippi
Edwards' property located at 406 Lee Avenue, Crystal Springs, Mississippi

Dear Mr. Mercier:

We are in receipt of your October 30, 2000 letter. We are sorry that you did not understand the substantive aspects of my October 26, 2000 letter and choose instead to resort to personal attacks. We will not do the same.

Rather, we provide the following, sometimes previously stated, information:

1. Contrary to your comments, BorgWarner was awaiting the identity of your consultant for the splitting of samples with BorgWarner and MDEQ. We clearly had reached agreement on this point. MDEQ reports that it was awaiting the same information. Instead, you proceeded without contacting either MDEQ or my client, which now delays the cleanup of various locations.

2. Your statement that independent sampling during the week of October 23, 2000 "certainly did not cause unreasonable delay on the cleanup process" is incorrect and misses the point. Had the parties conducted split sampling, remediation would have commenced immediately. You chose not to. Now we must await your consultant's sampling results to assure that, contrary to your pointed and baseless assertions concerning "attempt[s] to obfuscate the truth," the results are accurate and credible. If your results are at odds with both the MDEQ's and BorgWarner's sampling results, obviously further sampling will be necessary before remediation can proceed.

3. BorgWarner is not focused on posturing for litigation. BorgWarner is focused on its remediation efforts, which have been stalled by your actions. While some may suggest that splitting samples with a prospective plaintiffs' counsel only serves to preserve evidence, BorgWarner nonetheless readily agreed to do so in an effort to advance the remediation. You declined.

4. Your comments concerning "re-contamination" of clean properties reflect innuendo and scare tactics as well as a lack of understanding of the facts and environmental remediation practices. Any activities conducted by BorgWarner on the Kuhlman plant property will apply standard regulatory agency-approved containment methods. This is vastly different than cleaning downgradient properties, only to allow your client's properties to re-contaminate them upon the first, following rain.

5. BorgWarner was considering the purchase of your clients' property.

6. Statements to the effect that BorgWarner polluted *anything*, is responsible for the spread of chemicals, or knew of the toxic contamination for a "substantial length of time," relative to the Kuhlman plant, all completely misstate the facts. As stated in our conversations and in my October 26, 2000 letter, BorgWarner has never owned or operated the Kuhlman Electric plant and only recently learned of the contamination. The Kuhlman Electric plant was part of the Kuhlman Electric subsidiary of a company which BorgWarner purchased just last year. BorgWarner sold subsidiary and plant a mere nine months later, without knowledge of the contamination. As part of the sale, BorgWarner provided a contractual indemnity for possible contamination, which KEC's current corporate and plant management expressly represented did not exist.

   Once informed of the contamination on the KEC plant property, BorgWarner IMMEDIATELY began working with MDEQ and after sampling on the premises and instituting extensive containment measures, began investigating the possibility of run off to the neighboring residences. Shortly, BorgWarner scheduled cleanup activities and worked through MDEQ and the local government to inform citizens and arrange access. This work commenced in mid-October and continues where unobstructed by developments.

SEYFARTH SHAW
ATTORNEYS

Accordingly, the sooner you can share your sampling results, the sooner MDEQ and BorgWarner may determine how to proceed.

No one disputes your clients' right to sample their own property. Rather, BorgWarner proposed a sensible approach to gain the sought-after information. Instead, you choose a response premised on posturing, adversity and the building of lawsuits rather than proceeding cordially and progressively, as you had initially inferred. While you state that lines of communication remain open, the posturing, rumor, innuendo and scare tactics reflected throughout your letter raise serious doubts that continued discussions will receive anything other than a further, uncontrolled response.

Again, BorgWarner is extremely disappointed that the cleanup and the restoration of your clients' properties cannot proceed as scheduled due to your intervening course of action. BorgWarner will focus its efforts on working through MDEQ toward the prompt resolution of these issues, unless and until you propose and commit to a productive approach.

Very truly yours,

SEYFARTH SHAW

By: Thomas D. Lupo

TDL:cyn
Enclosures
10178873.1

cc: Anastasia Hamel
Scott E. Schang, Esq.
Gretchen Zmitrovitch
Kelly Dowell, Esq.

SEYFARTH SHAW
ATTORNEYS

55 East Monroe Street
Suite 4200
Chicago, IL 60603-5803
312-346-8000
www.seyfarth.com

Writer's direct phone

(312) 269-8889
Writer's e-mail

tlupo@seyfarth.com

October 27, 2000

VIA FACSIMILE (601) 206-1612

Douglas G. Mercier, Esq.
357 Towne Center Blvd.
Suite 203
Ridgeland, Mississippi 39157

Re: Kellums' property located at 412 Lee Avenue, Crystal Springs, Mississippi
Edwards' property located at 406 Lee Avenue, Crystal Springs, Mississippi

Dear Mr. Mercier:

Following our October 16, 2000 conversation, we received your October 17, 2000 letter and follow up information on the Edwards' home purchase. As I promptly responded in messages to you, we were considering the requests and information on the referenced properties and were awaiting information on your retained consultant. We stated that BorgWarner would be willing to split samples with your consultant and the Mississippi Department of Environmental Quality ("MDEQ"). In fact, we agreed with you that the sample collection and splitting activities be undertaken side-by-side with BorgWarner and MDEQ to maximize accuracy and credibility, and to reduce later issues.

As Anastasia Hamel stated to you on October 15, 2000, your clients' properties were designated to be remediated first, at MDEQ's direction. The equipment stood ready and was scheduled to proceed with the remediation and restoration on Wednesday, October 18, 2000. When you became involved, we remained hopeful that all aspects of your October 17, 2000 letter would be resolved by this past Monday, October 23, 2000 and the remediation promptly commenced. Unfortunately, we subsequently began receiving conflicting and second-hand information from various sources concerning different attorneys representing your clients, the conditions which might apply for proceeding with the clean up, and, most importantly, we received no information on a designated consultant for sample collection and splitting with MDEQ and BorgWarner.

On Monday, October 23, 2000, I contacted you in an attempt to clarify these issues. You verbally confirmed the "association" of another law firm, but provided little further information. I requested a follow up letter from you to clarify these issues in the hope that BorgWarner could promptly proceed with the cleanup and restoration of your clients' properties. I again asked you to keep

in mind that BorgWarner is performing these activities under the strict direction of and scheduling with the MDEQ. Accordingly, BorgWarner must coordinate any changes in plans with the MDEQ and knowledge of your clients' positions and intentions are necessary.

On October 25, 2000, we were informed that a consultant under the direction of another law firm had entered various properties, including those of your clients, and commenced some form of sampling activities in the midst of this MDEQ-directed action. No coordination, and therefore no split sampling or shared quality control of any kind, has occurred. The previously agreed approach, upon which we thought we had reached a sensible accommodation that we had hoped would be acceptable to MDEQ, likely would have allowed both your consultant's sampling and the properties' remediation to proceed in a timely manner. BorgWarner has full confidence in its sampling results. Samples are tested and quality controlled by two laboratories experienced with polychlorinated biphenyls analysis. Further, the samples are frequently split with on site MDEQ representatives for its own analysis. The current unfortunate and avoidable circumstances, including your October 17, 2000 letter's threat that any on site activities otherwise conducted by BorgWarner will constitute a trespass, complicate matters and delayed the cleanup of your clients' properties.

BorgWarner is extremely disappointed that the cleanup and restoration of your clients' properties cannot proceed at this time. It has invested substantial monies and resources to promptly address the properties adjacent to the plant and to protect the safety and health of the local population and the environment. The cleanup and restoration of your clients' properties would have been well underway and perhaps completed by this time. BorgWarner intends to proceed with remediation and restoration activities, where possible. However, the current phase of this activity, which was to address all of the actionable Lee Avenue and Jackson Street properties, will likely end shortly in this tangle of developments as it is conceivable that contamination from your clients' properties may re-contaminate cleaned properties.

As we also discussed, BorgWarner never directly owned or operated the Kuhlman Electric Corporation plant, but is acting pursuant to a contractual indemnity. The KEC facility was a subsidiary of a company which BorgWarner purchased in 1999. The KEC facility was sold a mere nine months later. BorgWarner and KEC are completely independent and unaffiliated companies and BorgWarner possesses only publicly available information about the KEC plant's operations. Nonetheless, upon being notified of existing contamination, BorgWarner promptly and voluntarily commenced, with the cooperation of KEC, MDEQ and local government, the investigation, remediation and restoration efforts at the KEC facility and the adjacent properties, such as your clients', to resolve these issues and to protect human health and the environment.

SEYFARTH SHAW
ATTORNEYS

As we are sure you understand, your October 26, 2000 letter, sent and received after these developments sponsored by you and your co-counsel, does nothing to resolve the circumstances creating the delay. While we by no means can speak for MDEQ, we do not believe the remediation will proceed until all sampling results are received and evaluated, and any conflicts resolved.

Please contact me if you wish to discuss any of the foregoing.

Very truly yours,

SEYFARTH SHAW

By: Thomas D. Lupo

TDL:cyn

cc: Anastasia Hamel
Scott E. Schang, Esq.
Gretchen Zmitrovich

DOUGLAS G. MERCIER
ATTORNEY AT LAW

357 TOWNE CENTER BLVD., SUITE 203
RIDGELAND, MISSISSIPPI 39157

FILE COPY

MAILING ADDRESS:
P.O. BOX 2324
RIDGELAND, MS 39158-2324

TELEPHONE: (601) 206-5557
FACSIMILE: (601) 206-1612
e-mail: lawyerdm@bellsouth.net

October 26, 2000

VIA FACSIMILE (810) 497-4441
Anastasia Hamel, Director of Environmental Programs

VIA FACSIMILE (312) 269-8869
Tom Lupo, Esq.

Re: Kellums' property located at 412 Lee Avenue, Crystal Springs, Mississippi; and Edwards' property located at 406 Lee Avenue, Crystal Springs, Mississippi

Dear Anastasia and Tom:

I have associated the law firm of David Nutt & Associates, Jackson, Mississippi, to assist in the handling of the cases for my clients affected by the chemical contamination and exposure from the Kuhlman Plant in Crystal Springs, Mississippi. Mary E. McAlister, Esq., 666 North Street, Suite 105-A, Jackson, Mississippi 39202, is primarily handling the cases on behalf of David Nutt & Associates.

It should go without saying, since there is a serious probability of litigation concerning the injuries and damages sustained as a result of chemical contamination from the Kuhlman Plant, Borg Warner and its affiliated and related companies should preserve all documents, soil samples, test data and other tangible things relating to the operations at the Kuhlman Plant, the use of chemicals at the Plant, and the disposal of same. Any destruction or spoliation of evidence will be dealt with appropriately.

I have not received a written response from your company that it will honor my clients' request regarding remediation efforts on their property, as outlined in my October 17, 2000, facsimile to you. Nevertheless, my clients do not wish to stand in the way of remediation or clean up efforts required by the Mississippi Department of Environmental Quality or those that your company believes to be necessary. Therefore, you may proceed with the remediation efforts that you deem necessary on the referenced property of the Kellums and Edwards families located on Lee Avenue.

Nothing contained in this letter, or the permission given for your company to conduct remediation efforts, is to be construed as a waiver of any rights or remedies of the Kellums, Edwards, or any of my other clients. My clients specifically reserve all rights and remedies that they possess now, or may possess in the future, against all persons or entities that may be responsible, in whole or in part, for any personal injury or property damages that they have sustained, or may sustain, as a result of chemical contamination or exposure, or remediation efforts for same.

If you wish to discuss this matter further, please do not hesitate to contact me.

Sincerely,

Douglas G. Mercier

DGM/jt
cc: Mary E. McAlister, Esq.
Paul and Susie Kellum

Tel: (601) 892-4661

Fax: (601) 892-6406

KUHLMAN ELECTRIC CORPORATION

Instrument Transformers

Power Transformers

101 Kuhlman Drive, Crystal Springs, Mississippi 39059

October 16, 2000

Ms. Kathy Daniel
Browning-Ferris Industries of MS, Inc.
P. O. Box 4736
Greenville, MS 38704-4736

RE: Kuhlman Electric
Waste Profiles for PCB Contaminated Soil

Dear Ms. Daniel:

Per your request, this letter details the source of the soil and the respective tonnage of waste associated with each site.

The contaminated soil that is destined for disposal is the result of remediation activities at various residences and commercial properties surrounding the Kuhlman Electric Corporation facility in Crystal Springs, Mississippi. The source of the PCB contamination is believed to be transformer oil used in the production of electrical transformers at the facility from the mid 1950s to 1973. As shown in the laboratory reports, there are no other contaminants associated with the soil.

The locations are as follows:

Medical Clinic – Lee Avenue	774 tons
Edwards Property – 406 Lee Avenue	446 tons
Garment Shop – 414 Lee Avenue	42 tons
Frazier Property – Lee Avenue	333 tons
Duplex –408/410 Lee Avenue	63 tons
Kellum Property – 412 Lee Avenue	228 tons
Dabney/Smith Property – N. Jackson & Lee Avenue	298 tons

Excavation is currently scheduled to begin during the week of October 16, 2000.

If you have any question or comments, please do not hesitate to call Robert **Martin at (828) 669 –** 3929.

Sincerely,
Kuhlman Electric Corporation

Alan Thomas
Manager Maintenance / Facility Engineer

Martin & Slagle
GeoEnvironmental Associates LLC

October 2, 2000

Ms. Gretchen Zmitrovich
Office of Pollution Control
Mississippi Department of Environmental Quality
P.O. Box 10385
Jackson, Mississippi 39289-0385

SUBJECT: Transmittal of Analytical Data for Residences
Kuhlman Electric Corporation
Crystal Springs, Mississippi

Dear Ms. Zmitrovich:

Attached are site plans and spreadsheets showing sampling locations and analytical results from sampling of soils by Ogden Environmental and Energy Services. The soil samples were collected from residential properties surrounding Kuhlman Electric Corporation. Samples were collected from various depths ranging from ground surface to 4 feet below grade and analyzed by an on-site laboratory. Split samples were sent to Paradigm Analytical Laboratories for confirmation of on-site lab results.

The following properties have concentrations of PCB 1260 in excess of 1 mg/kg.

1. Medical Clinic on Lee Avenue
2. Edwards Property at 406 Lee Avenue
3. Garment Shop at 414 Lee Avenue
4. Frazier Property on Lee Avenue
5. Duplex Property at 408/410 Lee Avenue
6. Kellum Property at 412 Lee Avenue
7. Dabney/Smith Property on N. Jackson and Lee Avenue

PO Box 1023
Black Mountain, NC 28711

(828) 669-3929
(828) 669-5289 fax

8. Cooper Property on N. Jackson and Fulgham Avenue

9. Larry and Carol Wright on N. Jackson Avenue

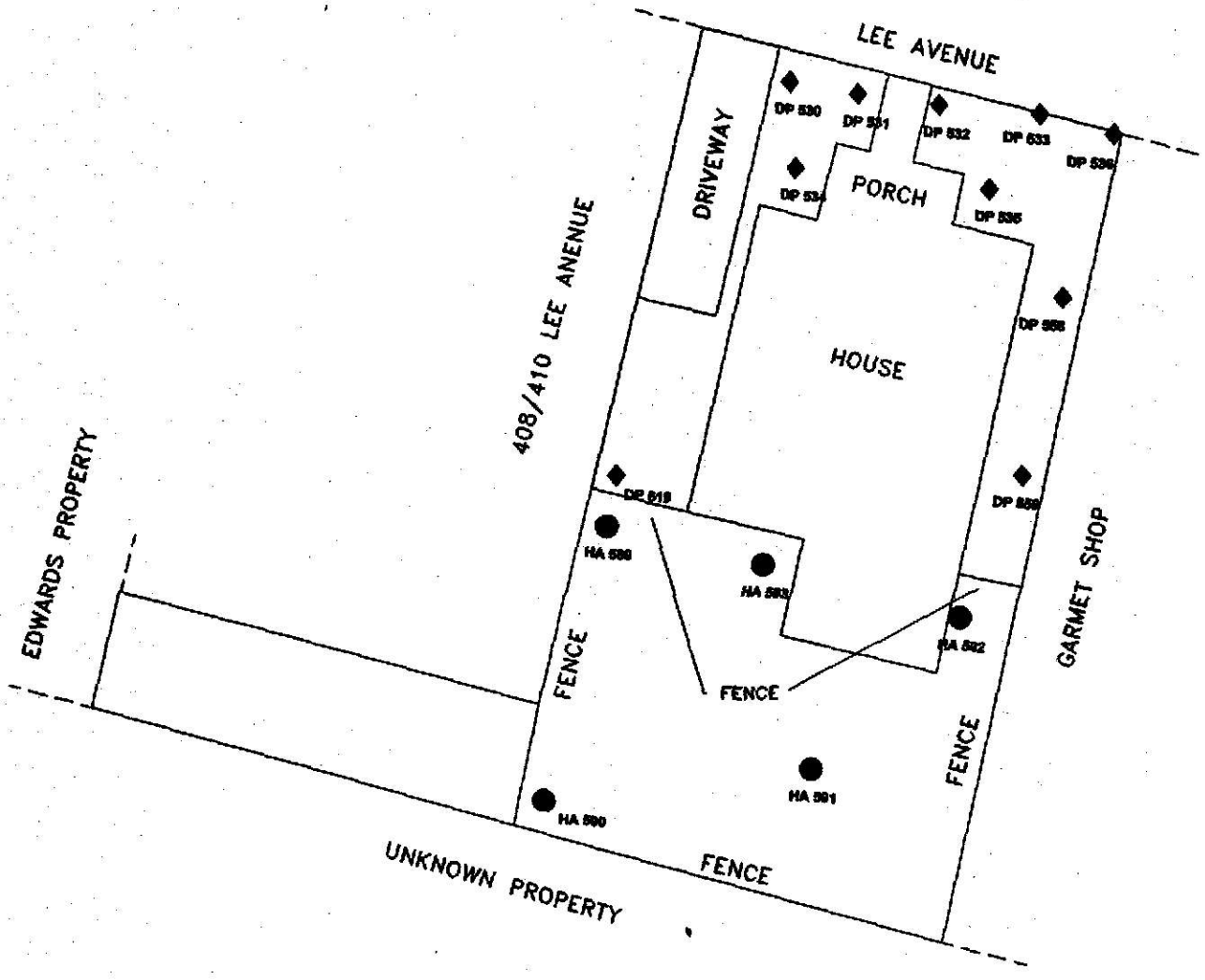
Please contact me at 828-669-3929 if you have any questions or comments concerning these results.

Sincerely,

Martin and Slagle GeoEnvironmental Associates, LLC

Robert L. Martin, P.G.
Project Manager

Cc: Anastasia Hamel, BorgWarner Inc.



LEGEND

◆ SAMPLE POINT
DP 592 SAMPLE POINT NUMBER
● SAMPLE POINT
HA 590 SAMPLE POINT NUMBER

25 0 25 50

1) ALL DISTANCES ARE ESTIMATED
2) THIS MAP WAS PREPARED FROM RECORD MAPS
3) THIS MAP HAS BEEN PREPARED FOR PRESENTATION PURPOSES ONLY

SAMPLE LOCATIONS FOR KELLUM PROPERTY 412 LEE AVENUE

SCALE: AS SHOWN	DR MDI	CHK TF	REV BPS

PREPARED BY:

OGDEN ENVIRONMENTAL AND ENGINEERING SERVICES
200 SOUTH OLD STATEVILLE ROAD • HUNTERSVILLE, NC 28078 • 704-875-3570

PROJ: 073350000	DATE: 09/24/00	SHEET 1 OF 1

Soil and Wipe Sample Results
Kellum Property
412 Lee Avenue
Crystal Springs, Mississippi

SOIL SAMPLES (MG/KG)									
Target Analyte	Sample #	DP-529	DP-529	DP-530	DP-530	DP-530	DP-531	DP-531	DP-531
	Depth	0.5 (0.1)	2.5	0.5 (0.1)	2.5	4	0.5 (0.1)	2.5	4
	Lab #	530	531	533	534	535	536	537	538
PCB as 1260		0.12	<0.10	1.6	<0.10	NA	3.2	<0.10	NA
	Collection Date	8/25/00	8/25/00	8/26/00	8/26/00	8/26/00	8/26/00	8/26/00	8/26/00
	Collection Time	17:00	17:01	8:13	8:14	8:15	8:26	8:27	8:28
	Injection Date	8/26/00	8/26/00	8/26/00	8/26/00	NA	8/26/00	8/26/00	NA

Notes:
NA Indicates Sample Not Analyzed
* J Estimated level, due to interference from the presence of Technical Chlordane, DDT, DDD, & DDE.

WIPE SAMPLES (TOTAL UG)							
Target Analyte	Sample #	KW-1	KW-2	KW-3	KW-4	KW-5	KW-6
	Depth						
	Lab #	651 SWAB	652	653	654	655	656
PCB as 1260		<0.50	<0.50	<0.50	<0.50	<0.50	0.56
	Collection Date	8/28/00	8/28/00	8/28/00	8/28/00	8/28/00	8/28/00
	Collection Time	15:44	15:48	15:49	15:50	15:53	15:56
	Injection Date	8/29/00	8/29/00	8/29/00	8/29/00	8/29/00	8/29/00

Notes:

LOCATION:
KW1: Plastic lawn table next to DP558.
KW2: Top of barbecue grill.
KW3: Above handle on screen door to front porch.
KW4: Plastic table next to DP530.
KW5: Bricks next to DP534.
KW6: Bricks next to DP535.

Soil and Wipe Sample Results
Kellum Property
412 Lee Avenue
Crystal Springs, Mississippi

SOIL SAMPLES (MG/KG)									
Target Analyte	Sample #	DP-532	DP-532	DP-532	DP-533	DP-533	DP-533	DP-534	DP-534
	Depth	0.5 (0.1)	2.5	4	0.5 (0.1)	2.5	4	0.5 (0.1)	2.5
	Lab #	539	540	541	542	543	544	545	546
PCB as 1260		5.5	<0.10	NA	2.3	<0.10	NA	16	<0.10
	Collection Date	8/26/00	8/26/00	8/26/00	8/26/00	8/26/00	8/26/00	8/26/00	8/26/00
	Collection Time	9:20	9:21	9:22	9:25	9:26	9:27	10:10	10:11
	Injection Date	8/26/00	8/26/00	NA	8/26/00	8/26/00	NA	8/26/00	8/26/00

Notes:
NA Indicates Sample Not Analyzed
* J Estimated level, due to interference from the presence of Technical Chlordane, DDT, DDD, & DDE.

SOIL SAMPLES (MG/KG)									
Target Analyte	Sample #	DP-534	DP-535	DP-535	DP-535	DP-536	DP-536	DP-536	DP-558
	Depth	4	0.5 (0.1)	2.5	4	0.5 (0.1)	2.5	4	0.5 (0.1)
	Lab #	547	548	549	552	550	551	555	605
PCB as 1260		NA	5.2	0.16	NA	1.8	<0.10	NA	7.8
	Collection Date	8/26/00	8/26/00	8/26/00	8/26/00	8/26/00	8/26/00	8/26/00	8/26/00
	Collection Time	10:12	10:40	10:45	10:21	10:19	10:20	10:26	16:05
	Injection Date	NA	8/26/00	8/26/00	NA	8/26/00	8/26/00	NA	8/27/00

Notes:
NA Indicates Sample Not Analyzed
* J Estimated level, due to interference from the presence of Technical Chlordane, DDT, DDD, & DDE.

Soil and Wipe Sample Results
Kellum Property
412 Lee Avenue
Crystal Springs, Mississippi

SOIL SAMPLES (MG/KG)								
Target Analyte	Sample #	DP-558	DP-559	DP-559	HA-589	HA-589	HA-590	HA-590
	Depth	2.5	0.5 (0.1)	2.5	0.5 (0.1)	2.5	0.5 (0.1)	2.5
	Lab #	606	607	608	712	713	714	715
PCB as 1260		<0.10	3.3	0.44	0.15	<0.10	0.13	<0.10
	Collection Date	8/26/00	8/26/00	8/26/00	8/29/00	8/29/00	8/29/00	8/29/00
	Collection Time	16:06	16:15	16:20	15:50	15:55	16:00	16:05
	Injection Date	8/27/00	8/27/00	8/27/00	8/30/00	8/30/00	8/30/00	8/31/00

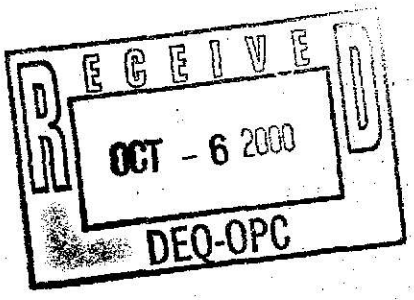
Notes:
NA Indicates Sample Not Analyzed
* J Estimated level, due to interference from the presence of Technical Chlordane, DDT, DDD, & DDE.

SOIL SAMPLES (MG/KG)							
Target Analyte	Sample #	HA-591	HA-591	HA-592	HA-592	HA-593	HA-593
	Depth	0.5 (0.1)	2.5	0.5 (0.1)	2.5	0.5 (0.1)	2.5
	Lab #	716	717	718	719	720	721
PCB as 1260		0.23J	<0.10	0.76J	<0.10	0.33J	<0.10
	Collection Date	8/29/00	8/29/00	8/29/00	8/29/00	8/29/00	8/29/00
	Collection Time	16:16	16:20	16:35	16:40	16:45	16:55
	Injection Date	8/31/00	8/31/00	8/31/00	8/31/00	8/31/00	8/31/00

Notes:
NA Indicates Sample Not Analyzed
* J Estimated level, due to interference from the presence of Technical Chlordane, DDT, DDD, & DDE.

Martin & Slagle
GeoEnvironmental Associates LLC

FILE COPY



October 5, 2000

Ms. Gretchen Zmitrovich
Office of Pollution Control
Mississippi Department of
Environmental Quality
Office of Pollution Control
P.O. Box 10385
Jackson, Mississippi 39289-0385

SUBJECT: Transmittal of Revised Analytical Data Tables for Residences
Kuhlman Electric Corporation
Crystal Springs, Mississippi

Dear Ms. Zmitrovich:

Attached is one complete set of revised spreadsheets showing analytical results from sampling of soils by Ogden Environmental and Energy Services. The tables were revised based on your review and comments. Results for split samples are being prepared into tables and will be forwarded to you by Monday at the latest.

Please contact me at 828-669-3929 if you have any questions or comments concerning these results.

Sincerely,

Martin and Slagle GeoEnvironmental Associates, LLC

Robert L. Martin, P.G.
Project Manager

Cc: Anastasia Hamel, BorgWarner Inc.

PO Box 1023
Black Mountain, NC 28711

(828) 669-3929
(828) 669-5289 fax

Soil and Wipe Sample Results
Kellum Property
412 Lee Avenue
Crystal Springs, Mississippi

SOIL SAMPLES (MG/KG)									
Target Analyte	Sample #	DP-529	DP-529	DP-529	DP-530	DP-530	DP-530	DP-531	DP-531
	Depth (ft)	0.5	2.5	4	0.5	2.5	4	0.5	2.5
	Lab #	530	531	532	533	534	535	536	537
PCB as 1260		0.12	<0.10	NA	1.6	<0.10	NA	3.2	<0.10
	Collection Date	8/25/00	8/25/00	8/25/00	8/26/00	8/26/00	8/26/00	8/26/00	8/26/00
	Collection Time	17:00	17:01	17:02	8:13	8:14	8:15	8:26	8:27
	Injection Date	8/26/00	8/26/00	NA	8/26/00	8/26/00	NA	8/26/00	8/26/00

Notes:
NA Indicates Sample Not Analyzed

WIPE SAMPLES (TOTAL UG)							
Target Analyte	Sample #	KW-1	KW-2	KW-3	KW-4	KW-5	KW-6
	Depth						
	Lab #	651 SWAB	652	653	654	655	656
PCB as 1260		<0.50	<0.50	<0.50	<0.50	<0.50	0.56
	Collection Date	8/28/00	8/28/00	8/28/00	8/28/00	8/28/00	8/28/00
	Collection Time	15:44	15:48	15:49	15:50	15:53	15:56
	Injection Date	8/29/00	8/29/00	8/29/00	8/29/00	8/29/00	8/29/00

Notes:

LOCATION:

KW1: Plastic lawn table next to DP558.
KW2: Top of barbecue grill.
KW3: Above handle on screen door to front porch.
KW4: Plastic table next to DP530.
KW5: Bricks next to DP534.
KW6: Bricks next to DP535.

Soil and Wipe Sample Results
Kellum Property
412 Lee Avenue
Crystal Springs, Mississippi

	SOIL SAMPLES (MG/KG)								
DP-534	Target Analyte	Sample #	DP-558	DP-559	DP-559	HA-589	HA-589	HA-590	HA-590
2.5		Depth (ft)	2.5	0.5	2.5	0.5	2.5	0.5	2.5
546		Lab #	606	607	608	712	713	714	715
<0.10	PCB as 1260		<0.10	3.3	0.44	0.15	<0.10	0.13	<0.10
8/26/00		Collection Date	8/26/00	8/26/00	8/26/00	8/29/00	8/29/00	8/29/00	8/29/00
10:11		Collection Time	16:06	16:15	16:20	15:50	15:55	16:00	16:05
8/26/00		Injection Date	8/27/00	8/27/00	8/27/00	8/30/00	8/30/00	8/30/00	8/31/00

	SOIL SAMPLES (MG/KG)							
DP-558	Target Analyte	Sample #	HA-591	HA-591	HA-592	HA-592	HA-593	HA-593
0.5		Depth (ft)	0.5	2.5	0.5	2.5	0.5	2.5
605		Lab #	716	717	718	719	720	721
7.8	PCB as 1260		0.23J	<0.10	0.76J	<0.10	0.33J	<0.10
8/26/00		Collection Date	8/29/00	8/29/00	8/29/00	8/29/00	8/29/00	8/29/00
16:05		Collection Time	16:16	16:20	16:35	16:40	16:45	16:55
8/27/00		Injection Date	8/31/00	8/31/00	8/31/00	8/31/00	8/31/00	8/31/00

Notes:

* J Estimated level, due to interference from the presence of Technical Chlordane, DDT, DDD, & DDE.

Soil and Wipe Sample Results
Kellum Property
412 Lee Avenue
Crystal Springs, Mississippi

	SOIL SAMPLES (MG/KG)								
DP-531	Target Analyte	Sample #	DP-532	DP-532	DP-532	DP-533	DP-533	DP-533	DP-534
4		Depth (ft)	0.5	2.5	4	0.5	2.5	4	0.5
538		Lab #	539	540	541	542	543	544	545
NA	PCB as 1260		5.5	<0.10	NA	2.3	<0.10	NA	16
8/26/00		Collection Date	8/26/00	8/26/00	8/26/00	8/26/00	8/26/00	8/26/00	8/26/00
8:28		Collection Time	9:20	9:21	9:22	9:25	9:26	9:27	10:10
NA		Injection Date	8/26/00	8/26/00	NA	8/26/00	8/26/00	NA	8/26/00

Notes:
NA Indicates Sample Not Analyzed

SOIL SAMPLES (MG/KG)								
Target Analyte	Sample #	DP-534	DP-535	DP-535	DP-535	DP-536	DP-536	DP-536
	Depth (ft)	4	0.5	2.5	4	0.5	2.5	4
	Lab #	547	548	549	552	550	551	555
PCB as 1260		NA	5.2	0.16	NA	1.8	<0.10	NA
	Collection Date	8/26/00	8/26/00	8/26/00	8/26/00	8/26/00	8/26/00	8/26/00
	Collection Time	10:12	10:40	10:45	10:21	10:19	10:20	10:26
	Injection Date	NA	8/26/00	8/26/00	NA	8/26/00	8/26/00	NA

Notes:
NA Indicates Sample Not Analyzed

OGDEN ENVIRONMENTAL AND ENGINEERING SERVICES, INC. FILE COPY

200 S. Old Statesville Road
Huntersville, NC 28078
704 875 3570
Fax 704 875 8711
Mailing Address
P.O. Box 3142
Huntersville, NC 28070

October 5, 2000

Ms. Gretchen Zmitrovich
Mississippi Dept. of Enviromental Quality
101 W. Capitol St.
Jackson, MS 39201

RE: CADD Drawings

Dear Ms. Zmitrovich:

Enclosed are your copies of corrected Autocad drawings for the Kellum property, the Dabney property and the Cooper property.

Corrections made were as follows. On the Kellum property map, the sampling point labeled as DP519 was corrected to read DP529. On the Dabney property map, the point originally labeled as DP578 was corrected to read DP587. On the Cooper property map, Fulgham was misspelled on the original.

I am forwarding copies of the corrected maps to both Martin & Slagle as well as Ms. Anastasia Hamel of BorgWarner Inc.

Any spreadsheet corrections will come from Martin & Slagle.

If you have any questions or comments, please call.

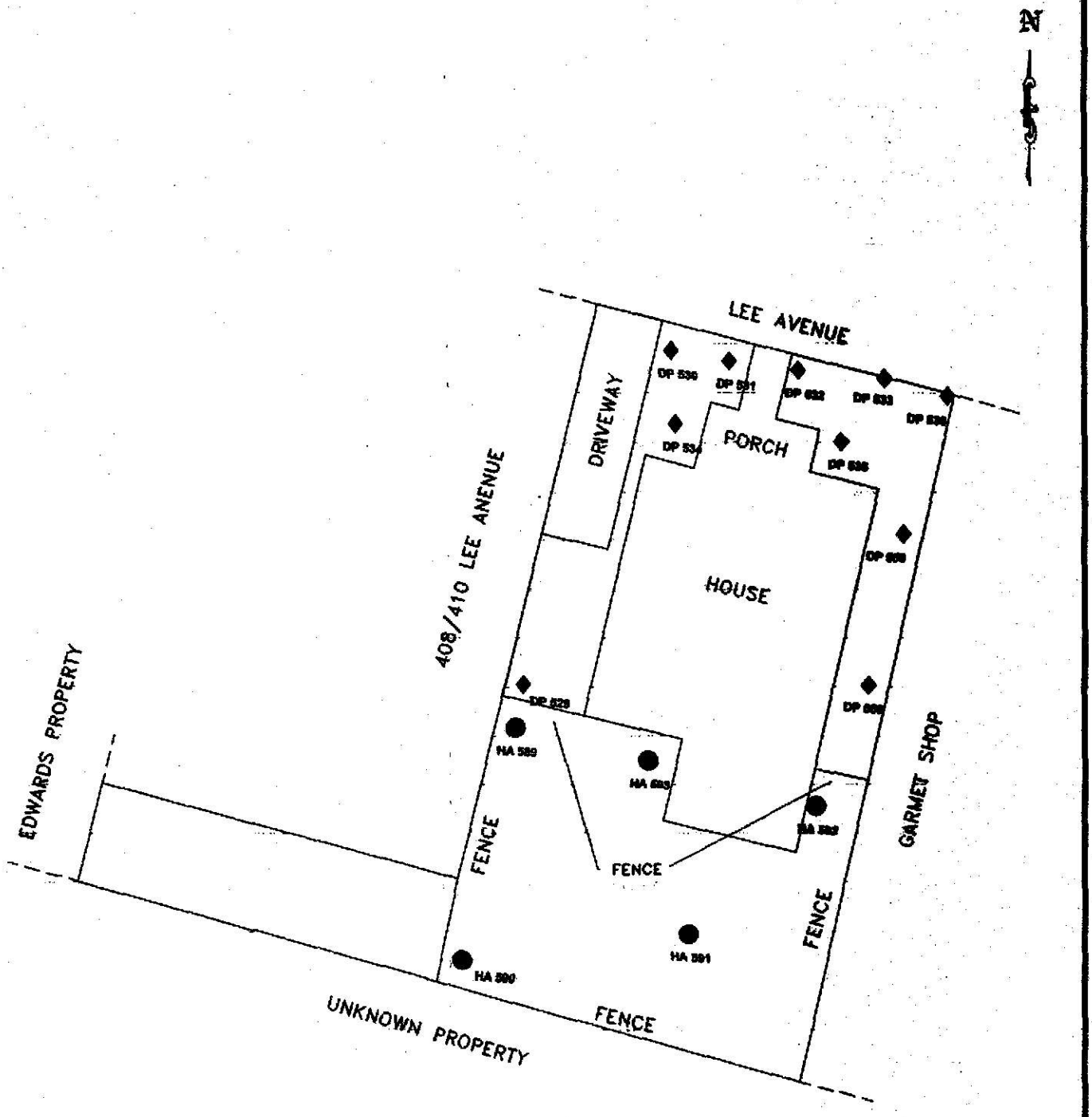
Sincerely,

OGDEN ENVIRONMENTAL AND ENGINEERING SERVICES, INC.

Timothy J. Fitzpatrick
Senior Environmental Chemist

Enclosure

Cc: Martin & Slagle
Ms. Anastasia Hamel



LEGEND

◆ SAMPLE POINT
DP 392 SAMPLE POINT NUMBER
● SAMPLE POINT
HA 590 SAMPLE POINT NUMBER

25 0 25 50

1) ALL DISTANCES ARE ESTIMATED
2) THIS MAP WAS PREPARED FROM RECORD MAPS
3) THIS MAP HAS BEEN PREPARED FOR PRESENTATION PURPOSES ONLY

SAMPLE LOCATIONS FOR KELLUM PROPERTY 412 LEE AVENUE

SCALE: AS SHOWN	DR MDI	CHK TF	REV BPS

PREPARED BY:

OGDEN ENVIRONMENTAL AND ENGINEERING SERVICES
200 SOUTH OLD STATEVILLE ROAD • HUNTERSVILLE, NC 28078 • 704-875-3570

PROJ: 073350000	DATE: 09/24/00	SHEET 1 OF 1

Martin & Slagle
GeoEnvironmental Associates LLC

FILE COPY

Facsimile Transmittal

Name: Gretchen Zmitrovich

Firm:

Fax No: (601) 961-5300

FYI - Call Robert to discuss -
@ 828-712-1115

Total Number of pages including cover: 3

Sender: C. Slagle Date: 10/11/00

PO Box 1023
Black Mountain, NC 28711

(828) 669-3929
(828) 669-5289 fax

HAROLD B. McCARLEY, JR. PLLC
ATTORNEY AT LAW
357 TOWNE CENTER BLVD., SUITE 103
RIDGELAND, MISSISSIPPI 39157

MAILING ADDRESS:
P.O. BOX 2728
RIDGELAND, MS 39158-2728

TELEPHONE: (601) 206-5557
FACSIMILE: (601) 206-1612
E-MAIL: hbm-law@netdoor.com

TELECOPIER COVER LETTER

DATE: 10/11/00

THIS COVER LETTER AND THE FOLLOWING 1 PAGE(S) ARE TO BE

SENT TO: NAME: ROBERT MARTIN

FIRM:

TELECOPIER NO.: 828-669-5289

FROM: NAME: HAROLD B. McCARLEY, JR.
TELECOPIER NO.: (601) 206-1612

SPECIAL MESSAGE/INSTRUCTIONS:

IF THERE ARE ANY PROBLEMS WITH RECEIPT OF THIS TRANSMISSION, PLEASE CALL (601) 206-5557.

DOUGLAS G. MERCIER
ATTORNEY AT LAW
357 TOWNE CENTER BLVD., SUITE 203
RIDGELAND, MISSISSIPPI 39157

MAILING ADDRESS:
P.O. BOX 2324
RIDGELAND, MS 39158-2324

TELEPHONE: (601) 206-5557
FACSIMILE: (601) 206-1612
e-mail: lawyerdm@bellsouth.net

October 11, 2000

VIA FACSIMILE 828-669-5289

Mr. Robert Martin

Re: Paul and Paula ("Susie") Kellum; 412 Lee Avenue, Crystal Springs, Mississippi

Dear Mr. Martin:

You and I met last night at the meeting conducted at the City Hall in Crystal Springs, Mississippi. I am an attorney, and I represent Paul and Paula ("Susie") Kellum.

My clients have asked that I correspond with you to discuss the remediation of their property which was brought up at the meeting last night, and that all correspondence and communication regarding the terms of remediation be addressed through me.

Accordingly, please telephone me at your earliest convenience so that we may discuss the potential remediation, and its effects on my clients and their property. However, until certain matters are resolved, you are not authorized to begin any operations on the property that my clients own at 412 Lee Avenue, Crystal Springs, Mississippi.

I look forward to hearing from you in the very near future since this is a matter of some urgency.

Sincerely,

Douglas G. Mercier

DGM/jt
cc: Paul and Susie Kellum

DOUGLAS G. MERCIER
ATTORNEY AT LAW

357 TOWNE CENTER BLVD., SUITE 203
RIDGELAND, MISSISSIPPI 39157

FILE COPY

MAILING ADDRESS:
P.O. BOX 2324
RIDGELAND, MS 39158-2324

TELEPHONE: (601) 206-5557
FACSIMILE: (601) 206-1612
e-mail: lawyerdm@bellsouth.net

October 17, 2000

FILE COPY

VIA FACSIMILE (810) 497-4441
Anastasia Hamel, Director of Environmental Programs

VIA FACSIMILE (312) 269-8869
Tom Lupo, Esq.

VIA FACSIMILE (312) 322-8621
Tom Lupo, Esq.
% Diane Gilbert

Re: Kellums' property located at 412 Lee Avenue, Crystal Springs, Mississippi; and Edwards' property located at 406 Lee Avenue, Crystal Springs, Mississippi

Dear Anastasia and Tom:

This letter follows our conference call of yesterday, October 16, 2000. If you will remember, there were several issues that I stated should be addressed. Those issues are: (a) the remediation and restoration operations on the property owned by the Kellums and the Edwards; (b) the preservation of all rights and remedies against all parties responsible for the exposure and contamination of PCB and other chemicals; and (c) splitting samples that will be taken during the remediation process, and the possibility that we may take our own samples prior to remediation.

As we discussed on the telephone, both the Kellums and the Edwards have given me a list of their concerns and objectives. Your company must represent, in writing, that it will honor my clients' requests prior to commencement of any remediation efforts on their property. Otherwise, your actions would be considered a trespass, and also give rise to a claim of spoilation of evidence.

The Kellums' concerns and requests are as follows:

1) Decontaminate all bricks around flowerbeds and concrete stepping stones, as well as rocks in flowerbeds on the north/northwest side of the house;

2) Return all bricks, stepping stones and rocks to the same placement and configuration in the pathways and flowerbeds;

3) Remediate the backyard, as well as the front yard and side yards;

4) Identify all plants and shrubs prior to remediation, and replace with the same size and maturity plants, including the density of monkey grass in the beds;

5) Sod the entire lawn;

6) Replace the underground soaker system in the northwest flower beds;

7) Move all large or heavy objects on the property to accomplish complete remediation;

8) Replace pea gravel in the patio area on the northeast side;

9) Board the family dog so that it will not be exposed during remediation;

10) Decontaminate all plastic and iron lawn furniture, as well as the fountain;

11) If the driveway is remediated, then it should be packed or covered to the same hardness and replaced with pea gravel;

12) Do not harm the large tree in the front of the house next to the street;

13) Save the holly tree on the west side of the house;

14) Replace the picket fence in the front yard if it is moved or damaged;

15) Decontaminate the planters, figurines, frogs, etc., if removed and they can be kept;

16) If possible, decontaminate the big stones in the flowerbeds so that they can be kept; and

17) Return in the Spring of next year to replace any plants or shrubbery which die or fail to take root.

Following is the list of the concerns and objectives of the Edwards for their house:

1) Preserve all existing trees in place: one (1) pecan tree and one (1) cedar tree in the front; two (2) pin oaks on the east edge west of the driveway; and one (1) crepe myrtle;

2) Replace all flowering shrubs and plants around the trees, around the house and in the lawn, including: two (2) shrubs of unknown variety growing at the base of the pin

oak tree nearest the north edge of the lot; several flowering plants from bulbs growing at the base of that same tree; yellow irises growing around the northwest corner of the front porch; and spider lily bulbs disbursed throughout the lawn east of the porch;

3) Preserve all trees on the property line hedgerow (west edge of the lot and south edge);

4) Replace all sod with new grass; and

5) Return in the Spring of next year to replace any plants or shrubbery which die or fail to take root.

At this time, we are attempting to line up a company to conduct testing on the Kellums' and Edwards' property, as well as some of the other properties owned by other clients. If you will agree to split samples that will be taken during the remediation of those properties, we will agree to split samples with you as well.

Nothing contained in this letter, nor my clients' permission for your company to conduct remediation efforts on their property, is to be construed as a waiver of any of their rights or remedies. My clients specifically reserve all rights and remedies that they possess now, or may possess in the future, against all persons or entities that may be responsible, in whole or in part, for any personal injury or property damages that they have sustained, or may sustain, as a result of chemical contamination or exposure.

Please provide me a response in writing to document my file. Your response must be received by me, and approved by my clients, before the remediation process begins on the referenced property owned by the Kellums and the Edwards.

If you have any questions, or wish to discuss this matter further, please do not hesitate to contact me.

Sincerely,

Douglas G. Mercier

DGM/jt