

# GIS REGISTRY

## Cover Sheet

March, 2010  
(RR 5367)

### Source Property Information

BRRTS #:

ACTIVITY NAME:

PROPERTY ADDRESS:

MUNICIPALITY:

PARCEL ID #:

CLOSURE DATE:

FID #:

DATCP #:

COMM #:

#### \*WTM COORDINATES:

X:  Y:

*\* Coordinates are in  
WTM83, NAD83 (1991)*

#### WTM COORDINATES REPRESENT:

Approximate Center Of Contaminant Source

Approximate Source Parcel Center

Please check as appropriate: (BRRTS Action Code)

### Contaminated Media:

Groundwater Contamination > ES (236)

Contamination in ROW

Off-Source Contamination

*(note: for list of off-source properties  
see "Impacted Off-Source Property" form)*

Soil Contamination > \*RCL or \*\*SSRCL (232)

Contamination in ROW

Off-Source Contamination

*(note: for list of off-source properties  
see "Impacted Off-Source Property" form)*

### Land Use Controls:

N/A (Not Applicable)

Soil: maintain industrial zoning (220)

*(note: soil contamination concentrations  
between non-industrial and industrial levels)*

Structural Impediment (224)

Site Specific Condition (228)

Cover or Barrier (222)

*(note: maintenance plan for  
groundwater or direct contact)*

Vapor Mitigation (226)

Maintain Liability Exemption (230)

*(note: local government unit or economic  
development corporation was directed to  
take a response action)*

### Monitoring Wells:

Are all monitoring wells properly abandoned per NR 141? (234)

Yes  No  N/A

*\* Residual Contaminant Level*

*\*\*Site Specific Residual Contaminant Level*

This Adobe Fillable form is intended to provide a list of information that is required for evaluation for case closure. It is to be used in conjunction with Form 4400-202, Case Closure Request. The closure of a case means that the Department has determined that no further response is required at that time based on the information that has been submitted to the Department.

**NOTICE: Completion of this form is mandatory** for applications for case closure pursuant to ch. 292, Wis. Stats. and ch. NR 726, Wis. Adm. Code, including cases closed under ch. NR 746 and ch. NR 726. The Department will not consider, or act upon your application, unless all applicable sections are completed on this form and the closure fee and any other applicable fees, required under ch. NR 749, Wis. Adm. Code, Table 1 are included. It is not the Department's intention to use any personally identifiable information from this form for any purpose other than reviewing closure requests and determining the need for additional response action. The Department may provide this information to requesters as required by Wisconsin's Open Records law [ss. 19.31 - 19.39, Wis. Stats.].

BRRTS #:  PARCEL ID #:   
ACTIVITY NAME:  WTM COORDINATES: X:  Y:

**CLOSURE DOCUMENTS** (the Department adds these items to the final GIS packet for posting on the Registry)

- Closure Letter**
- Maintenance Plan** (if activity is closed with a land use limitation or condition (land use control) under s. 292.12, Wis. Stats.)
- Continuing Obligation Cover Letter** (for property owners affected by residual contamination and/or continuing obligations)
- Conditional Closure Letter**
- Certificate of Completion (COC)** (for VPLE sites)

**SOURCE LEGAL DOCUMENTS**

- Deed:** The most recent deed as well as legal descriptions, for the **Source Property** (where the contamination originated). Deeds for other, off-source (off-site) properties are located in the **Notification** section.  
**Note:** If a property has been purchased with a land contract and the purchaser has not yet received a deed, a copy of the land contract which includes the legal description shall be submitted instead of the most recent deed. If the property has been inherited, written documentation of the property transfer should be submitted along with the most recent deed.
- Certified Survey Map:** A copy of the certified survey map or the relevant section of the recorded plat map for those properties where the legal description in the most recent deed refers to a certified survey map or a recorded plat map. (lots on subdivided or platted property (e.g. lot 2 of xyz subdivision)).  
**Figure #:**                      **Title: Alta Survey, Roehlig Land Surveying and Consulting, July 01, 2002**
- Signed Statement:** A statement signed by the Responsible Party (RP), which states that he or she believes that the attached legal description accurately describes the correct contaminated property.

**MAPS** (meeting the visual aid requirements of s. NR 716.15(2)(h))

Maps must be no larger than 11 x 17 inches unless the map is submitted electronically.

- Location Map:** A map outlining all properties within the contaminated site boundaries on a U.S.G.S. topographic map or plat map in sufficient detail to permit easy location of all parcels. If groundwater standards are exceeded, include the location of all potable wells within 1200 feet of the site.  
**Note:** Due to security reasons municipal wells are not identified on GIS Packet maps. However, the locations of these municipal wells must be identified on Case Closure Request maps.  
**Figure #: 1**                      **Title: Property Location Map**
- Detailed Site Map:** A map that shows all relevant features (buildings, roads, individual property boundaries, contaminant sources, utility lines, monitoring wells and potable wells) within the contaminated area. This map is to show the location of all contaminated public streets, and highway and railroad rights-of-way in relation to the source property and in relation to the boundaries of groundwater contamination exceeding a ch. NR 140 Enforcement Standard (ES), and/or in relation to the boundaries of soil contamination exceeding a Residual Contaminant Level (RCL) or a Site Specific Residual Contaminant Levels (SSRCL) as determined under s. NR 720.09, 720.11 and 720.19.  
**Figure #: 2, 23**                      **Title: Site Layout-REC Status, Location of NR 141 MWs and permanent Geoprobe wells**
- Soil Contamination Contour Map:** For sites closing with residual soil contamination, this map is to show the location of all contaminated soil and a single contour showing the horizontal extent of each area of contiguous residual soil contamination that exceeds a Residual Contaminant Level (RCL) or a Site Specific Residual Contaminant Level (SSRCL) as determined under s. NR 720.09, 720.11 and 720.19.  
**Figure #: 19,21,22,29**                      **Title: PAH Non-Industr. Direct Contact , PAH Industr. DC, Lead Industr. DC, cap location map**

BRRTS #: 02-71-553456

ACTIVITY NAME: Meritor - Rec 17 Sitewide Fill

**MAPS (continued)**

- Geologic Cross-Section Map:** A map showing the source location and vertical extent of residual soil contamination exceeding a Residual Contaminant Level (RCL) or a Site Specific Residual Contaminant Level (SSRCL). If groundwater contamination exceeds a ch. NR 140 Enforcement Standard (ES) when closure is requested, show the source location and vertical extent, water table and piezometric elevations, and locations and elevations of geologic units, bedrock and confining units, if any.

**Figure #: 17 Title: East/West Geologic Cross-Section of REC 1**

**Figure #: 18 Title: North/South Geologic Cross-Section of REC 1-3A-13**

- Groundwater Isoconcentration Map:** For sites closing with residual groundwater contamination, this map shows the horizontal extent of all groundwater contamination exceeding a ch. NR140 Preventive Action Limit (PAL) and an Enforcement Standard (ES). Indicate the direction and date of groundwater flow, based on the most recent sampling data.

**Note:** This is intended to show the total area of contaminated groundwater.

**Figure #: 26 Title: Extent of fill and barium impacted soil and groundwater at REC 17**

- Groundwater Flow Direction Map:** A map that represents groundwater movement at the site. If the flow direction varies by more than 20° over the history of the site, submit 2 groundwater flow maps showing the maximum variation in flow direction.

**Figure #: 24 Title: Potentiometric surface map May 2007**

**Figure #: 25 Title: REC 17 Groundwater elevation contours and flow direction, November 19 2009**

**TABLES (meeting the requirements of s. NR 716.15(2)(h)(3))**

Tables must be no larger than 11 x 17 inches unless the table is submitted electronically. Tables must not contain shading and/or cross-hatching. The use of **BOLD** or *ITALICS* is acceptable.

- Soil Analytical Table:** A table showing remaining soil contamination with analytical results and collection dates.  
**Note:** This is one table of results for the contaminants of concern. Contaminants of concern are those that were found during the site investigation, that remain after remediation. It may be necessary to create a new table to meet this requirement.

**Table #: 2,3,4,5,6 Title: Soil Results, Soil-GW Ba data, PAH Soil Data, BaP Equivalentents data, BenzoA RCL calculations**

- Groundwater Analytical Table:** Table(s) that show the most recent analytical results and collection dates, for all monitoring wells and any potable wells for which samples have been collected.

**Table #: 7 Title: Summary of site-wide groundwater analytical results and comparison to WDNR criteria**

- Water Level Elevations:** Table(s) that show the previous four (at minimum) water level elevation measurements/dates from all monitoring wells. If present, free product is to be noted on the table.

**Table #: 10 Title: Summary of static groundwater elevation data and LNAPL thickness**

**IMPROPERLY ABANDONED MONITORING WELLS**

For each monitoring well not properly abandoned according to requirements of s. NR 141.25 include the following documents.

**Note:** If the site is being listed on the GIS Registry for only an improperly abandoned monitoring well you will only need to submit the documents in this section for the GIS Registry Packet.

- Not Applicable**

- Site Location Map:** A map showing all surveyed monitoring wells with specific identification of the monitoring wells which have not been properly abandoned.

**Note:** If the applicable monitoring wells are distinctly identified on the Detailed Site Map this Site Location Map is not needed.

**Figure #: Title:**

- Well Construction Report:** Form 4440-113A for the applicable monitoring wells.

- Deed:** The most recent deed as well as legal descriptions for each property where a monitoring well was not properly abandoned.

- Notification Letter:** Copy of the notification letter to the affected property owner(s).

BRRTS #: 02-71-553456

ACTIVITY NAME: Meritor - Rec 17 Sitewide Fill

## NOTIFICATIONS

### Source Property

Not Applicable

**Letter To Current Source Property Owner:** If the source property is owned by someone other than the person who is applying for case closure, include a copy of the letter notifying the current owner of the source property that case closure has been requested.

**Return Receipt/Signature Confirmation:** Written proof of date on which confirmation was received for notifying current source property owner.

### Off-Source Property

Group the following information per individual property and label each group according to alphabetic listing on the "Impacted Off-Source Property" attachment.

Not Applicable

**Letter To "Off-Source" Property Owners:** Copies of all letters sent by the Responsible Party (RP) to owners of properties with groundwater exceeding an Enforcement Standard (ES), and to owners of properties that will be affected by a land use control under s. 292.12, Wis. Stats.

**Note:** Letters sent to off-source properties regarding residual contamination must contain standard provisions in Appendix A of ch. NR 726.

**Number of "Off-Source" Letters:**

**Return Receipt/Signature Confirmation:** Written proof of date on which confirmation was received for notifying any off-source property owner.

**Deed of "Off-Source" Property:** The most recent deed(s) as well as legal descriptions, for all affected deeded **off-source property(ies)**. This does not apply to right-of-ways.

**Note:** If a property has been purchased with a land contract and the purchaser has not yet received a deed, a copy of the land contract which includes the legal description shall be submitted instead of the most recent deed. If the property has been inherited, written documentation of the property transfer should be submitted along with the most recent deed.

**Letter To "Governmental Unit/Right-Of-Way" Owners:** Copies of all letters sent by the Responsible Party (RP) to a city, village, municipality, state agency or any other entity responsible for maintenance of a public street, highway, or railroad right-of-way, within or partially within the contaminated area, for contamination exceeding a groundwater Enforcement Standard (ES) and/or soil exceeding a Residual Contaminant Level (RCL) or a Site Specific Residual Contaminant Level (SSRCL).

**Number of "Governmental Unit/Right-Of-Way Owner" Letters:**



## State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Jim Doyle, Governor  
Matthew J. Frank, Secretary  
Ronald W. Kazmierczak, Regional Director

Northeast Region Headquarters  
2984 Shawano Ave,  
Green Bay, WI 54313-6727  
FAX 929-662-5413  
TTY Access via Relay 711

November 15, 2010

DAVID O'CONNOR  
MERITOR HEAVY VEHICLE LLC  
2135 WEST MAPLE ROAD  
TROY MI 48084

SUBJECT: Final Case Closure with Continuing Obligations  
Meritor Heavy Vehicle (aka Axletech), 1005 High Avenue, Oshkosh, WI  
**VPLE #06-71-517594**

Dear Mr. O'Connor:

The purpose of this letter is to summarize the closure of 18 identified Recognized Environmental Conditions (RECs) on this site and plan for the final Certificate of Completion. The Department considers this site closed and no further investigation or remediation is required at this time.

The Northeast Region Closure Committee reviewed the initial Requests for Closure on November 12, 2009. The Closure Committee reviews environmental remediation cases for compliance with state laws and standards to maintain consistency in the closure of these cases. Based on the correspondence and data provided, your case meets the closure requirements in ch. NR 726, Wisconsin Administrative Code. The final closure decision was based on the property being used for heavy industrial manufacturing at the time of closure.

While the Department considers this case closed, you and future property owners must comply with certain continuing obligations as explained in this letter. Because of the residual contamination and certain continuing obligations for this site, before use of this site can be changed to a residential, commercial, agricultural or other non-industrial use, notification of the Department is required, and additional investigation and/or cleanup may be required. You also need to pass this information about these continuing obligations on to anyone who purchases this property from you (i.e. pass on this letter).

### Background and Summary

In 2003 Meritor (former Axletech) entered the Wisconsin Voluntary Party Exemption Program (VPLE) in order to fully assess the various areas of recognized environmental concern (RECs) on the property. A total of 18 RECs were investigated, evaluated, and remediated as necessary.

The entire Meritor property was developed on historic soil fill that contains concentrations of arsenic, lead, cadmium, and Polycyclic Aromatic Hydrocarbons (PAHs) that are higher than standard background levels. Current and future property owners and managers should be aware that the "Site-wide Materials Handling & Cap Maintenance Plan" must be followed when any excavation or construction work is planned at the property. This factor was taken into account when evaluating each REC for closure. Please refer to the attached Maintenance Plan for details.

The following is a summary of the RECs and their associated closure requirements

[*Note: Benzo(a)Pyrene equivalents were calculated and used for determining risk and cap requirements*]:

- ❖ REC 17 – Site-wide Fill (BRRTS # 02-71-553456) → Several metals and PAHs are present across the property in excess of non-industrial and industrial soil standards. Therefore, Industrial Land Use is to be maintained at the entire property, in addition to several areas requiring cap maintenance because the concentrations exceed industrial levels of the site specific calculated Benzo(a)Pyrene equivalents.
- ❖ REC 1 – Heat Treat Tunnel (#02-71-379727) & REC 3A – Quench Tanks (#02-71-548684) → vegetable based quench oil removed to the extent practicable; however some does remain in place. Closure with maintenance of an engineered cap for concentrations related to the site-wide fill (REC 17).
- ❖ REC 2 – Assembly Area Underground Storage Tanks (UST) (#09-71-543963) → investigated and given “No Action Required” (NAR) status.
- ❖ REC 3B – Waste Oil UST (#09-71-415098) → investigated and given “No Action Required” (NAR) status. However, maintenance of an engineered cap required over this area based on concentrations related to the site-wide fill (REC 17).
- ❖ REC 3C – Exterior Tank Area (#02-71-415152) → Closure with Industrial Land Use.
- ❖ REC 3D – Coolant USTs (#09-71-548685) & REC 5 – VTLs (#09-71-415068) → investigated and given “No Action Required” (NAR) status.
- ❖ REC 3G – Gear Lube USTs (#09-71-544839) → investigated and given “No Action Required” (NAR) status.
- ❖ REC 4 – HMCS (#02-71-415060) → investigated and given site specific closure [handle remaining contaminated soils as a solid waste]
- ❖ REC 6 – Radial Drill Coolant Pit (#09-71-415078) & REC 15 – Ex-Cell-O VTL (#09-71-415132) → investigated and given “No Action Required” (NAR) status. However, maintenance of an engineered cap required over this area based on concentrations related to the site-wide fill (REC 17).
- ❖ REC 7 – Paint Booth Area (#09-71-543964) → investigated and given “No Action Required” (NAR) status.
- ❖ REC 8 & 10 – Waste Storage Rooms (#09-71-415088) → investigated and given “No Action Required” (NAR) status. However, maintenance of an engineered cap required over this area based on concentrations related to the site-wide fill (REC 17).
- ❖ REC 11 – Coolant Mixing Room (#09-71-544862) → investigated and given “No Action Required” (NAR) status.
- ❖ REC 12 – Air Compressor Room (#09-71-415107) → investigated and given “No Action Required” (NAR) status.
- ❖ REC 13 – South Broaches Area (#09-71-415114) → investigated and given “No Action Required” (NAR) status. However, maintenance of an engineered cap required over this area based LNAPL presence from REC 1/REC 3A.
- ❖ REC 14 – Elevator Pit (#09-71-415125) → investigated and given “No Action Required” (NAR) status.

- ❖ REC 16 – Oil USTs (#03-71-415143) → Industrial Land Use must be maintained.
- ❖ REC 18 – Former Finishing Warehouse (#09-71-553639) → investigated and given “No Action Required” (NAR) status. However, maintenance of an engineered cap required over this area based on concentrations related to the site-wide fill (REC 17).

### **Continuing Obligations and Public Notice of Residual Contamination (GIS Registry)**

While the Department considers this case closed, you and future property owners must comply with certain continuing obligations as explained in this letter.

In lieu of a restriction on your Deed, this site will be listed on the Remediation and Redevelopment Program’s GIS Registry. The specific reasons are summarized below:

- Residual soil contamination exists that must be properly managed should it be excavated or removed;
- Before the land use may be changed from industrial to non-industrial, additional environmental assessment work may be necessary;
- Pavement, an engineered cover or a soil barrier must be maintained over contaminated soil and the state must approve any changes to this barrier;
- Groundwater contamination is present above Chapter NR 140 enforcement standards;

This letter and information that was submitted with your closure request application will be included on the GIS Registry. To review the sites on the GIS Registry web page, visit the RR Sites Map page at <http://dnr.wi.gov/org/aw/rr/gis/index.htm>. If the property is listed on the GIS Registry because of remaining contamination and you intend to construct or reconstruct a well, you will need prior Department approval in accordance with s. NR 812.09(4)(w), Wis. Adm. Code. To obtain approval, Form 3300-254 needs to be completed and submitted to the DNR Drinking and Groundwater program’s regional water supply specialist. This form can be obtained on-line <http://dnr.wi.gov/org/water/dwg/3300254.pdf> or at the web address listed above for the GIS Registry.

#### Cover or Barrier

Pursuant to s. 292.12(2)(a), Wis. Stats., the pavement, building foundation and asphalt/compacted gravel cover that currently exists in the location shown on the attached map shall be maintained in compliance with the attached maintenance plan in order to prevent direct contact with residual soil contamination that might otherwise pose a threat to human health.

#### Prohibited Activities

The following activities are prohibited on any portion of the property where pavement, a building foundation, soil cover, engineered cap or other barrier is required as shown on the attached map, unless prior written approval has been obtained from the Wisconsin Department of Natural Resources: 1) removal of the existing barrier; 2) replacement with another barrier; 3) excavating or grading of the land surface; 4) filling on capped or paved areas; 5) plowing for agricultural cultivation; 6) construction or placement of a building or other structure.

### Industrial Land Use Limitation

Soil and fill samples were taken on areas of the Property in areas not included in the areas covered by the cap maintenance plan that are representative of remaining residual soil contamination on this property that contained PAHs and several other metals in concentrations that exceeded NR 720.11, Table 2, Wis. Adm. Code, non-industrial soil standards and met NR 720.11, Table 2, Wis. Adm. Code, industrial soil standards or in concentrations that meet the site-specific industrial soil standards developed for this site.

Therefore, pursuant to s. NR 726.05(8)(b)1., Wis. Adm. Code, this property may not be used or developed for a residential, commercial, agricultural or other non-industrial use, unless (at the time that the non-industrial use is proposed) the property owner provides notification to the Department of Natural Resources of the change in land use and an investigation is conducted, to determine the degree and extent of the PAH and metal contamination that remains on the property, and remedial action is taken as necessary to meet all applicable non-industrial soil cleanup standards.

### Residual Soil Contamination

Residual soils remain on the property containing PAHs and metals. If soil is excavated in the future, then pursuant to ch. NR 718 or, if applicable, ch. 289, Stats., and chs. 500 to 536, the property owner at the time of excavation must sample and analyze the excavated soil to determine if residual contamination remains. If sampling confirms that contamination is present the property owner at the time of excavation will need to determine whether the material is considered solid or hazardous waste and ensure that any storage, treatment or disposal is in compliance with applicable standards and rules. In addition, all current and future owners and occupants of the property need to be aware that excavation of the contaminated soil may pose an inhalation or other direct contact hazard and as a result special precautions may need to be taken to prevent a direct contact health threat to humans.

### Residual Groundwater Contamination

Groundwater concentrations of various petroleum-related compounds and metals are greater than enforcement standards set forth in ch. NR140, Wis. Adm. Code. For more detailed information regarding the locations where groundwater samples have been collected (i.e., monitoring well locations) and the associated contaminant concentrations, refer to the Remediation and Redevelopment Program's GIS Registry at the RR Sites Map page at <http://dnr.wi.gov/org/aw/rr/gis/index.htm>.

DNR fact sheet, RR-819, "Continuing Obligations for Environmental Protection" has been included with this letter, to help explain a property owner's responsibility for continuing obligations on their property. You may obtain additional copies at <http://dnr.wi.gov/org/aw/rr/archives/pubs/RR819.pdf>.

### Final VPLE Invoice

A Final invoice will be sent to you under separate cover when the internal work is completed and hours can be finalized.

### Natural Attenuation Insurance

As noted in a previous email to you, the site will require natural attenuation insurance because groundwater contamination at the site exceeds NR 140 Wis. Adm. Code Enforcement Standard Exceedances.

Please submit the application for natural attenuation insurance as soon as possible along with the appropriate fee to the attention of our VPLE Coordinator:

Michael Prager, RR/5  
State of Wisconsin  
Department of Natural Resources  
PO Box 7921  
Madison WI 53707-7921

The application and fee schedule is included for your convenience and can also be found at the following web pages: <http://www.dnr.state.wi.us/org/aw/rr/archives/pubs/4400-224.pdf> (Application Form)

<http://www.dnr.state.wi.us/org/aw/rr/archives/pubs/RR661.pdf> (Fee schedule)

The Department appreciates your efforts to restore the environment at this site. If you have any questions regarding this closure decision or anything outlined in this letter, please contact Kathy Sylvester at (920) 424-0399.

Sincerely,



Roxanne Nelezen Chronert, Acting Team Supervisor  
Northeast Region Remediation & Redevelopment Program

Attachments:

- Site-Wide Materials Handling and Cap Maintenance Plan for Engineered Barriers, Prepared by Arcadis, dated 10/14/2010
- Figure 3 Extent of Engineered Barriers with the photographic Locations depicting conditions. Prepared by Arcadis, dated 7/2/2010  
PUB-RR-819 Continuing Obligations for Environmental Protection
- PUB-RR-661 Insurance for VPLE sites using Natural Attenuation
- Form 4400-224 Environmental Insurance Application

e-cc: Case File – OSH

Michael Prager – CO

Gary Kjelleren – General Dynamics (via email: [gkjeller@gdatp.com](mailto:gkjeller@gdatp.com))

w/o attachments: Brian Maillet – Arcadis (via email: [bmaillet@arcadis-us.com](mailto:bmaillet@arcadis-us.com))

**Site-Wide Materials Handling and Cap Maintenance Plan for Engineered Barriers**

This Site-Wide Materials Handling and Cap Maintenance Plan for Engineered Barriers (“Plan”) is applicable at the Property known as the Former Meritor Facility (Meritor) located at 1005 High Avenue in the city of Oshkosh, Winnebago County, Wisconsin (“Property”), and depicted on Figures 1 and 2. AxleTech International, Inc. (AxleTech) is currently continuing axle manufacturing operations at the Property. AxleTech is currently owned by General Dynamics Armament and Technical Products, Inc. (General Dynamics).

A copy of this Plan shall at all times be kept on file in the offices of: (1) the Wisconsin Department of Natural Resources (WDNR), Northeast Region; (2) the owner of the Property, currently General Dynamics, its successors and assigns (hereinafter identified collectively as the “Owner”); and (3) the Property manager, currently AxleTech (hereinafter identified collectively as the “Property manager”). The Plan shall be made available by the Property manager to contractors, utilities and maintenance personnel, and any other public or private persons or entities authorized to perform excavation work at the Property.

The purpose of this Plan is to describe the procedures and controls that shall be followed to properly manage (1) all unsaturated soils at the Property; (2) Cap elements that are protective of direct contact exposure with unsaturated soils and light non-aqueous phase liquid (LNAPL); (3) Cap elements that mitigate LNAPL migration, and (4) the existing subsurface setting that contains the natural redox gradient between Recognized Environmental Condition (REC) 17 and the Fox River. Unsaturated Soils are hereby defined as the full depth of soils, extending from the ground surface to the water table, which ranges from approximately 2 to 5 feet below ground surface (ft bgs). LNAPL is hereby defined as quench mineral oil that is a primary eye irritant and may be a skin irritant (see attached Material Safety Data Sheet) and has been identified in the subsurface soil vadose zone (approximately 4 to 6 ft bgs) at REC 1- Heat Treating Area, REC 3A- Former Quench Oil Underground Storage Tanks (USTs), and REC 13- Broaches Area.

The Cap elements protective of direct contact exposure are approved engineered barriers which may consist of the facility concrete flooring and foundation, the asphalt and gravel parking lots placed over the unsaturated soils, and any future concrete flooring or foundations, and asphalt or gravel parking surfaces placed over the unsaturated soils. The Cap elements that mitigate LNAPL migration are engineered barriers which consist of the current facility concrete flooring and foundation or any

future flooring, foundation, or pavement. It is understood that the current industrial zoning of the Property is a Cap element. The maintaining of the industrial setting is an administrative requirement of this Plan. The extents of the engineered barriers at the Property are shown on attached Figure 3.

The engineered barriers will be maintained in accordance with the Plan. Maintaining the function of the engineered barriers will continue to limit direct contact exposure with unsaturated soils and LNAPL that may be encountered during construction and maintenance activities at the Property. The engineered barriers will also mitigate LNAPL migration.

The WDNR and its successor and assigns (hereinafter identified collectively as the "Department") shall be notified of any activity that is not in accordance with this Plan.

### **Allowed Activities**

The following allowed activities must comply with all listed requirements:

**A1. Construction or Installation of Buildings, Structures or Other Improvements.** Buildings, structures or other improvements may be constructed or installed on the Property using footings or other foundations that are placed into the unsaturated soils in the following manner:

- A) The contractor performing the work shall be provided a copy of this Plan by the Property manager and shall prepare a health and safety plan, appropriate to the work being performed.
- B) All materials used in the pavement or foundation shall not contain any hazardous waste. Unsaturated soils or granular layer materials that are excavated shall be separated and segregated to the extent practicable so that they may be replaced upon completion of the work following proper analytical testing of the soils in accordance with applicable solid waste regulations. Any such excavation of unsaturated soils or granular layer materials shall be conducted in accordance with the health and safety plan. All excavated unsaturated soils shall be, at a minimum, placed onto plastic sheeting and covered, or placed into a watertight container such as a covered roll-off box.

- C) Upon completion of the work, previously excavated unsaturated soils and granular layer materials may be backfilled, provided, however, that the unsaturated soils are not classified as a solid or hazardous waste and the backfilled unsaturated soils maintain the compaction characteristics of the surrounding unsaturated soils. The unsaturated soils or granular layered material, as well as any additional clean soil or granular fill material necessary to backfill to grade, shall be backfilled in such a manner as to maintain the original depth of the unsaturated soils or granular layer material, as the case may be. The following shall be properly characterized and managed in accordance with state law with notice to the Department: 1) any previously excavated unsaturated soils; 2) any excavated granular material that has been commingled, mixed or otherwise in contact with unsaturated soils, which is not backfilled; and 3) any groundwater encountered and removed during construction.
  
- D) A memorandum or report shall be prepared describing the work performed, identifying the person(s) performing the work and the date of the work, and confirming that the Plan was adhered to in completion of the work. A copy of the report shall be kept on file by the Property manager, and shall be filed with the Department.

**A2. Utility Installations or Repairs.** No utility repairs or installation of new or replacement utilities shall be conducted on the Property until after the utility and any contractor(s) for the utility have acknowledged receipt of a copy of this Plan. The utility repairs or installation(s) shall be conducted in strict conformance with the standards set forth below with respect to excavations into and/or beneath the Site, and such excavations are to be undertaken in the following manner:

- A) The contractor performing the work shall be provided with a copy of this Plan by the Property manager and shall prepare a health and safety plan, appropriate to the work being performed.
  
- B) Unsaturated soils or granular layer materials that are excavated, all for purposes of utility installation or repair, shall be separated and segregated to the extent practicable so that they may be replaced upon completion of the work following proper analytical testing of the soils in accordance with applicable solid waste regulations. All excavated unsaturated soils shall be, at a minimum, placed onto

plastic sheeting and covered, or placed into a watertight container such as a covered roll-off box.

- C) Upon completion of such work, the excavated unsaturated soils may be placed back into the excavation, provided, however, that any excavated unsaturated soils placed back into the excavation are not classified as a solid or hazardous waste and that the soils maintain the compaction characteristics of the surrounding unsaturated soils.
- D) Any excavation of unsaturated soils shall be conducted in accordance with the health and safety plan. Any such soils excavated from beneath the unsaturated soils shall be segregated, properly characterized and managed in accordance with state law with notice to the Department. Any other soils which have been commingled, mixed or otherwise have come into contact with soils excavated from beneath unsaturated soils shall be properly characterized and managed in accordance with state law with notice to the Department. Any soils which have been commingled, mixed or otherwise have come into contact with soils excavated from beneath 4 ft bgs at RECs 1, 3A, and 13 and may contain LNAPL shall be properly characterized and managed in accordance with state law with notice to the Department. Any groundwater affected by such activities shall be managed in accordance with state law after notice to the Department.
- E) Clean fill used in connection with utility installation or construction shall not include any granular or porous material, but may include low strength flowable fill or other fill with low hydraulic conductivity.
- F) If the utility installation or construction involves any disturbance of the seals used to seal the entrance of utility lines and the structures, such seals shall be replaced with new seals of like or superior quality.
- G) A memorandum report shall be prepared describing the work performed, identifying the person(s) performing the work and the date of the work, and confirming that the Plan was adhered to in completion of the work. A copy of the report shall be kept on file with the utility, the Property manager, and shall be filed with the Department.

**A3. Offsite Disposal of Excavated Soils.** If it becomes necessary or desirable to dispose of excavated soils from the allowed construction, repair, and installation

activities, the excavation and resulting soils shall be managed in accordance with s. NR 718.13, Wis. Adm. Code.

## Required Activities

**R1. Annual Cap Inspections.** Not less than annually, the Property shall be inspected by the Property manager to ensure that the integrity of the Engineered Barriers is maintained. The condition of the Engineered Barriers is important to protecting human health from direct contact with the underlying residually impacted soils. The Engineered Barriers can contain cracks, fissures, and shallow holes from normal usage and weather conditions and still be protective of direct contact. Hereafter, 'significant' cracks, fissures, and holes are defined as conditions which would lead to the compromise of the total cap integrity and/or would allow for humans to inadvertently contact the residual impacted soil beneath the Engineered Barriers. Any disturbances of the Engineered Barriers or significant fissures or cracks in the asphalt, gravel, or concrete caps shall be noted. The Engineered Barriers to be inspected are shown on Figure 3.

An engineered barrier inspection form shall be completed by the Property manager which identifies the date of the inspection, the individuals conducting the inspection; any observed disturbances of the Engineered Barriers and any significant fissures or cracks in the asphalt or concrete caps. A copy of the engineered barrier inspection form is attached. All inspection forms shall be maintained on file by the Property manager for a period of 3 years.

**R2. Repairs to Capped Areas.** If, during the annual inspections or other routine inspections of the Property, the Engineered Barriers (see Figure 3) are observed to have been disturbed or significant fissures, cracks or erosional features are observed in the asphalt, gravel, or concrete caps, the Property manager shall arrange to have repairs made to such areas, in a manner consistent with section A1 of this Plan. Such repairs shall be carried out within a reasonable period of time subject to weather and seasonal considerations. All repairs shall be documented on the attached work order form, which will be maintained on file by the Property manager.

**R3. Maintaining the Natural Redox Gradient.** The existing subsurface setting located between the Engineered Barrier for REC 17 and the Fox River shall be maintained to ensure the existing natural redox gradient continues to precipitate dissolved barium from groundwater to regulatory levels that are acceptable to

the WDNR. Repairs and maintenance of the surface grade, including the existing jogging trail, are acceptable under this Plan.

### **Request for Deviations**

The Property manager and Owner shall not conduct any activities at Property that are not in compliance with this Plan, unless written approval to do so is obtained from the Department.



**ENGINEERED BARRIER  
Annual Inspection Form  
Facility Located at  
1005 High Avenue, Oshkosh, Wisconsin  
BRRTS VPLE #: 06-71-517594**

Name of Inspector: \_\_\_\_\_

Company: \_\_\_\_\_

Date: \_\_\_\_\_

Time: \_\_\_\_\_

Inspector able to inspect all engineered barriers (see Figure 3)?  Yes  No

If no, explain: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Is this a scheduled inspection?  Yes  No

If no, explain: \_\_\_\_\_

\_\_\_\_\_

**Inspection Results:**

Engineered Barrier Condition:

- Significant fissures, cracks, and shallow holes that would allow for humans to inadvertently contact the underlying residually impacted soils:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

- Significant fissures, cracks, and shallow holes that would allow for surface water infiltration at the heat treat, former quench oil, and broches areas:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

- Other:

\_\_\_\_\_

If any of the above conditions were observed, note area and explain. Sketch or photograph extent and location of observed damage below (or on a separate attachment):

**ENGINEERED BARRIER  
Work Order  
Facility Located at  
1005 High Avenue, Oshkosh, Wisconsin  
BRRTS VPLE #: 06-71-517594**

Report Number: \_\_\_\_\_

Date of Initial Inspection: \_\_\_\_\_

Name of Inspector: \_\_\_\_\_

Type of problem: \_\_\_\_\_

Required upgrade: \_\_\_\_\_

Completed on: \_\_\_\_\_

Comments: \_\_\_\_\_

Corrective action assigned to/completed by:

Name/Company	Date

**Reinspection Information**

Observations: \_\_\_\_\_

Comments: \_\_\_\_\_

Inspector: \_\_\_\_\_

Signature

Date

**State of Wisconsin**  
**Department of Natural Resources**

**CERTIFICATE OF COMPLETION  
OF RESPONSE ACTIONS  
UNDER SECTION 292.15(2)(ae), WIS. STATS.**

**Whereas**, Axletech International Inc has applied for an exemption from liability under s. 292.15, Wis. Stats., for the property located at 1005 High Street, Oshkosh, Wisconsin, which is commonly referred to as the **Arvin Meritor** site, further described in the legal description found on Attachment A (the "Property");

**Whereas**, an environmental investigation of the Property has been conducted and the Wisconsin Department of Natural Resources ("WDNR") has determined that environmental contamination exists at the Property;

**Whereas**, Axletech International Inc has submitted to the WDNR certain investigation reports and a remedial action plan for the Property which comply with the requirements set forth in chs. NR 700-754, Wis. Adm. Code, consisting of the documents and reports listed in Attachment B;

**Whereas**, in accordance with s. 292.15(2)(ae)1, Wis. Stats., in a letter dated March 27, 2007 the WDNR determined that an environmental investigation has been conducted which adequately identified and evaluated the nature and extent of the hazardous substance discharges on the Property;

**Whereas**, the Wisconsin Department of Natural Resources ("WDNR") has determined that the historic fill material brought onto or existing at the property in the past does not qualify as exempt under s. NR 500.08, Wis. Adm. Code. If anyone proposes to do any future construction work on the Property, that person would need to obtain approval for that work from the WDNR under s. NR 506.085, Wis. Adm. Code, prior to initiating any construction on the Property;

**Whereas**, the Property with soil contamination that exceeds site-specific and/or generic residual contaminant levels ("RCLs") under ch. NR 720, Wis. Adm. Code, and groundwater contamination that exceeds a groundwater quality enforcement standard under ch. NR 140, Wis. Adm. Code, will be included on the WDNR's Geographical Information System data base ("the GIS Registry") pursuant to s. 292.12(3), Wis. Stats. **Axletech International Inc** has submitted to the WDNR all the information necessary to be included on the GIS Registry pursuant to s. NR 726.05(2)(a)3. and s. NR 726.05(3)(a)4., Wis. Adm. Code;

**Whereas**, on November 15, 2010, the WDNR issued a case closure letter for the Property (Attachment C). The owner of this Property shall adhere to, abide by, and maintain the continuing obligation and other requirements that are specified in the attached state case closure letter and cap maintenance plans; The WDNR requires maintenance of a cover or barrier in order to prevent direct contact with and infiltration through residual soil contamination that might otherwise pose a threat to public health and the environment. The closure letter requires that if soil with residual contamination is excavated in the future, the Property owner at the time of excavation must manage the soil in accordance with applicable federal and state laws. The closure letter also requires that the site be used for an industrial land use due to residual soil contamination.

**Whereas**, on November 15, 2010, the WDNR determined that response actions necessary to restore the environment were completed, except with respect to groundwater contaminated with **petroleum-related compounds, metals, and a vegetable-based quench oil** above the ch. NR 140, Wis. Adm. Code, groundwater quality enforcement standards. The WDNR has determined that this groundwater contamination will be brought into compliance through natural attenuation, in accordance with administrative rules promulgated by the WDNR.

**Whereas**, the WDNR has determined that the response action is complete and was based on the Property being used as an industrial and/or commercial facility. The response action is complete with regard to protection from residual soil contamination that may pose a human health threat through direct contact. In the event that the cover or barrier areas that currently exist are removed, the replacement barrier must be equally protective. Because of the residual contamination and certain continuing obligations for this site, before use of this site can be changed to residential use, or use by certain sensitive populations, such as a day care center, school, a senior center, hospital or a similar use, notification of the Department is required. Additional sampling and/or cleanup may be required to determine if it is protective based on future land uses;

**Whereas**, if the requirements of this Certificate, the case closure letter or the cap maintenance plans are not followed, or if the land use changes, the WDNR may take actions under ss. 292.11 or 292.12, Wis. Stats., to ensure compliance with the specified requirements, and the person who owns or controls the Property may no longer qualify for the liability protections under s. 292.15, Wis. Stats.; and

**Whereas**, Axletech International Inc has paid to WDNR the appropriate insurance fee and has submitted a complete insurance application form to obtain coverage for the Property under the state's master insurance contract in accordance with s. 292.15(2)(ae)3m., Wis. Stats., and ch. NR 754, Wis. Adm. Code, based on their desire to use natural attenuation to remediate groundwater contamination that exceeds ch. NR 140, Wis. Adm. Code, groundwater quality enforcement standards;

**Therefore**, based upon the information that has been submitted, the WDNR hereby certifies that the response actions set forth in the WDNR approved remedial action plan for the Property and any other necessary response actions have been completed, except with respect to **petroleum-related compounds, metals, and a vegetable-based quench oil** contaminated groundwater above ch. NR 140, Wis. Adm. Code, enforcement standards that WDNR has determined will be brought into compliance through natural attenuation, in accordance with rules promulgated by WDNR.

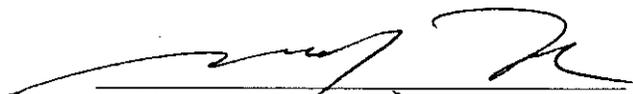
Upon issuance of this Certificate, **Axletech International Inc** and the persons qualified for protection under s. 292.15(3), Wis. Stats., are exempt from the provisions of ss. 289.05(1), (2), (3) and (4), 289.42(1), 289.67, 291.25(1) to (5), 291.29, 291.37, 292.11(3), (4), and (7)(b) and (c) and 292.31(8), Wis. Stats., with respect to the existence of hazardous substances on or originating from the Property, the release of which occurred prior to the date the WDNR approved the environmental investigation required under s. 292.15(2)(ae)1., Wis. Stats. However, the person who owns or controls the Property would no longer qualify for this liability exemption if that person fails to maintain or monitor the Property as required by the conditions in this Certificate, the November 15, 2010 case closure letter, s. 292.12, Wis. Stats., and administrative rules promulgated by the WDNR. Any discharges of a hazardous substance to or from the Property that occur after the date that the environmental investigation was approved will be the responsibility of the current Property owner and any other person who possesses or controls that discharge and any person who caused the discharge.

If natural attenuation of contaminated groundwater fails, the insurance coverage under s. 292.15(2)(ae)3m., Wis. Stats., may be used to cover the costs of complying with s. 292.11(2), Wis. Stats., with respect to groundwater quality.

The protection from liability provided under s. 292.15(2), Wis. Stats., does not apply to any person who has obtained a Certificate of Completion by fraud or misrepresentation, or by knowingly failing to disclose material information or under circumstances in which **Axletech International Inc** knew or should have known about more discharges of hazardous substances than was revealed by the investigation approved by the WDNR.

Nothing in this Certificate or in s. 292.15, Wis. Stats., affects the authority of the WDNR to exercise any powers or duties under applicable laws other than ss. 289.05(1), (2), (3) and (4), 289.42(1), 289.67, 291.25(1) to (5), 291.29, 291.37, 292.11(3), (4), and (7)(b) and (c) and 292.31(8), Wis. Stats., with respect to any release or threatened release of contaminants at the Property, or the right of the WDNR to seek relief available against any person who is not entitled to protection from liability under s. 292.15, Wis. Stats., with respect to such release or threatened release.

SIGNED AND CERTIFIED this 16th day of December, 2010.



Matthew Frank, Secretary  
Wisconsin Department of Natural Resources

**ATTACHMENT A  
LEGAL DESCRIPTION  
Axletech International Inc**

See attached Warranty Deed Doc. # 1224631 recorded with Winnebago County Register of Deeds Office on January 14, 2003.



## ADDENDUM "A" - LEGAL DESCRIPTION

### Parcel No. 1:

Lots 7 and 15 and that part of Lots 22 and 23 lying Westerly or Southwesterly of the Right of Way of the Chicago and Northwestern Railway, and on which the main track of said Railway Company, through aforementioned Lots, is located and part of Lots 16 and 17, all in Assessor's Plat (Axle) Fifth Ward, City of Oshkosh, Winnebago County, Wisconsin, excepting therefrom rail road rights of way, as now located.

### Parcel No. 2

Lots 14, 18, 19 and 24, all in Assessor's Plat (Axle), Fifth Ward, City of Oshkosh, excepting therefrom rail road rights of way, as now occupied.

### Parcel No. 3:

That Part of Lots 16, 17 and 23 all in Assessor's Plat (Axle), Fifth Ward, City of Oshkosh, described as follows: VIZ.:

Commencing on the Northerly or Northwesterly Line of New Street (later known as Forest Avenue), as per Leach's Map of 1894, at the point of intersection with the Westerly line of the right of way of the Chicago and Northwestern Railway Company, and on which the main track of said railway company through aforementioned Lots is located, thence Northwesterly along the Westerly line of said Right of Way to point of intersection with the extended most Northwesterly line of Property owned and occupied by the Timken-Detroit Axle Company, and more particularly described in Deed recorded in Winnebago County Registry, in Volume 450 of Deeds on pages 278 to 281 inclusive, thence Northeasterly to the most Westerly corner of property of the Timken-Detroit Axle Company, as aforementioned thence Northeasterly 83 feet to an iron corner thence Southeasterly 22 feet to an iron corner, thence Northeasterly 51.7 feet to an iron corner, thence Southeasterly 62.1 feet to an iron corner, thence Northeasterly 130 feet to a point on the Westerly or Southwesterly line of High Street, 387.5 feet Northwesterly of the point of intersection of said Westerly line of High Street with the Northerly line of aforementioned New Street (last 5 directions constituting the division line between lands occupied by the Timken-Detroit Axle Company, and claimed by virtue of Deeds recorded in Winnebago County Registry, in Volume 450 on pages 278 to 281 inclusive, and in Volume 501 on pages 209 and 210), thence Southeasterly along the Westerly line of High Street, 387.5 feet to point of intersection with the Northerly line of aforementioned New Street, thence Southwesterly along the Northerly line of the aforementioned New Street, to the place of beginning, excepting therefrom rail road rights of way, as now occupied.

### Parcel No. 4:

All that tract of parcel of land being Lot Twenty-two (22) in the Assessor's Plat (Axle) Fifth Ward, City of Oshkosh, County of Winnebago, State of Wisconsin, less and except the following described tract of land:

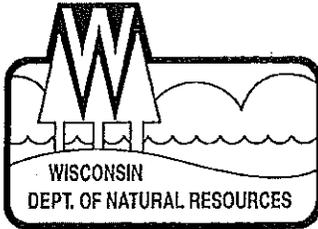
Commencing at the Southeasterly (most Easterly) corner of Lot Twenty-one (21) in said Plat; thence Southwesterly, at right angles to the Northeasterly line of said Lot Twenty-one (21) to the Northeasterly Bank of the Fox River; thence Northwesterly, along the Northeasterly bank of said river, to the Northerly line of said Lot Twenty-two (22) (said line being the Southerly line of said Lot Twenty-one (21)); thence Easterly, along the Northerly line of said Lot Twenty-two (22), to the place of beginning.

**ATTACHMENT B**  
**INVESTIGATION AND REMEDIAL ACTION PLAN REPORTS**  
**Axletech International Inc**

1. Phase II Environmental Site Assessment, February 2, 2001, Arcadis.
2. Phase I Environmental Site Assessment, December 2001, Arcadis.
3. Phase II Environmental Property Assessment Report, February 21, 2002, Arcadis.
4. Workplan for Supplemental Investigation and Remediation Activities, November 7, 2003, Arcadis.
5. Supplemental Site Investigation and Remediation Progress Report, June 2005, Arcadis.
6. Supplemental Site Investigation and Remediation Progress Report, January 31, 2007, Arcadis.
7. March 27, 2007 letter from WDNR approving site investigation and remediation recommendations.
8. Project Status Meeting, June 2009, Arcadis.
9. Summary of Supplemental Investigation Activities, October 30, 2009, Arcadis.
10. LNAPL Mobility Assessment, April 2010, Arcadis.
11. Closure Package submittals for each of the RECs, 2009-2010, Arcadis.

**ATTACHMENT C**  
**Closure Letter and Cap Maintenance Plan**  
**Axletech International Inc.**

See Attached November 15, 2010, Case Closure Letter and cap maintenance plan for the **Axletech International Inc.** site.



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Jim Doyle, Governor  
Matthew J. Frank, Secretary  
Ronald W. Kazmierczak, Regional Director

Northeast Region Headquarters  
2984 Shawano Ave,  
Green Bay, WI 54313-6727  
FAX 929-662-5413  
TTY Access via Relay 711

November 15, 2010

DAVID O'CONNOR  
MERITOR HEAVY VEHICLE LLC  
2135 WEST MAPLE ROAD  
TROY MI 48084

SUBJECT: Final Case Closure with Continuing Obligations  
Meritor Heavy Vehicle (aka Axletech), 1005 High Avenue, Oshkosh, WI  
**VPLE #06-71-517594**

Dear Mr. O'Connor:

The purpose of this letter is to summarize the closure of 18 identified Recognized Environmental Conditions (RECs) on this site and plan for the final Certificate of Completion. The Department considers this site closed and no further investigation or remediation is required at this time.

The Northeast Region Closure Committee reviewed the initial Requests for Closure on November 12, 2009. The Closure Committee reviews environmental remediation cases for compliance with state laws and standards to maintain consistency in the closure of these cases. Based on the correspondence and data provided, your case meets the closure requirements in ch. NR 726, Wisconsin Administrative Code. The final closure decision was based on the property being used for heavy industrial manufacturing at the time of closure.

While the Department considers this case closed, you and future property owners must comply with certain continuing obligations as explained in this letter. Because of the residual contamination and certain continuing obligations for this site, before use of this site can be changed to a residential, commercial, agricultural or other non-industrial use, notification of the Department is required, and additional investigation and/or cleanup may be required. You also need to pass this information about these continuing obligations on to anyone who purchases this property from you (i.e. pass on this letter).

Background and Summary

In 2003 Meritor (former Axletech) entered the Wisconsin Voluntary Party Exemption Program (VPLE) in order to fully assess the various areas of recognized environmental concern (RECs) on the property. A total of 18 RECs were investigated, evaluated, and remediated as necessary.

The entire Meritor property was developed on historic soil fill that contains concentrations of arsenic, lead, cadmium, and Polycyclic Aromatic Hydrocarbons (PAHs) that are higher than standard background levels. Current and future property owners and managers should be aware that the "Site-wide Materials Handling & Cap Maintenance Plan" must be followed when any excavation or construction work is planned at the property. This factor was taken into account when evaluating each REC for closure. Please refer to the attached Maintenance Plan for details.

The following is a summary of the RECs and their associated closure requirements  
[*Note: Benzo(a)Pyrene equivalents were calculated and used for determining risk and cap requirements*]:

- ❖ REC 17 – Site-wide Fill (BRRTS # 02-71-553456) → Several metals and PAHs are present across the property in excess of non-industrial and industrial soil standards. Therefore, Industrial Land Use is to be maintained at the entire property, in addition to several areas requiring cap maintenance because the concentrations exceed industrial levels of the site specific calculated Benzo(a)Pyrene equivalents.
- ❖ REC 1 – Heat Treat Tunnel (#02-71-379727) & REC 3A – Quench Tanks (#02-71-548684) → vegetable based quench oil removed to the extent practicable; however some does remain in place. Closure with maintenance of an engineered cap for concentrations related to the site-wide fill (REC 17).
- ❖ REC 2 – Assembly Area Underground Storage Tanks (UST) (#09-71-543963) → investigated and given “No Action Required” (NAR) status.
- ❖ REC 3B – Waste Oil UST (#09-71-415098) → investigated and given “No Action Required” (NAR) status. However, maintenance of an engineered cap required over this area based on concentrations related to the site-wide fill (REC 17).
- ❖ REC 3C – Exterior Tank Area (#02-71-415152) → Closure with Industrial Land Use.
- ❖ REC 3D – Coolant USTs (#09-71-548685) & REC 5 – VTLs (#09-71-415068) → investigated and given “No Action Required” (NAR) status.
- ❖ REC 3G – Gear Lube USTs (#09-71-544839) → investigated and given “No Action Required” (NAR) status.
- ❖ REC 4 – HMCS (#02-71-415060) → investigated and given site specific closure [handle remaining contaminated soils as a solid waste]
- ❖ REC 6 – Radial Drill Coolant Pit (#09-71-415078) & REC 15 – Ex-Cell-O VTL (#09-71-415132) → investigated and given “No Action Required” (NAR) status. However, maintenance of an engineered cap required over this area based on concentrations related to the site-wide fill (REC 17).
- ❖ REC 7 – Paint Booth Area (#09-71-543964) → investigated and given “No Action Required” (NAR) status.
- ❖ REC 8 & 10 – Waste Storage Rooms (#09-71-415088) → investigated and given “No Action Required” (NAR) status. However, maintenance of an engineered cap required over this area based on concentrations related to the site-wide fill (REC 17).
- ❖ REC 11 – Coolant Mixing Room (#09-71-544862) → investigated and given “No Action Required” (NAR) status.
- ❖ REC 12 – Air Compressor Room (#09-71-415107) → investigated and given “No Action Required” (NAR) status.
- ❖ REC 13 – South Broaches Area (#09-71-415114) → investigated and given “No Action Required” (NAR) status. However, maintenance of an engineered cap required over this area based LNAPL presence from REC 1/REC 3A.
- ❖ REC 14 – Elevator Pit (#09-71-415125) → investigated and given “No Action Required” (NAR) status.

### Industrial Land Use Limitation

Soil and fill samples were taken on areas of the Property in areas not included in the areas covered by the cap maintenance plan that are representative of remaining residual soil contamination on this property that contained PAHs and several other metals in concentrations that exceeded NR 720.11, Table 2, Wis. Adm. Code, non-industrial soil standards and met NR 720.11, Table 2, Wis. Adm. Code, industrial soil standards or in concentrations that meet the site-specific industrial soil standards developed for this site.

Therefore, pursuant to s. NR 726.05(8)(b)1., Wis. Adm. Code, this property may not be used or developed for a residential, commercial, agricultural or other non-industrial use, unless (at the time that the non-industrial use is proposed) the property owner provides notification to the Department of Natural Resources of the change in land use and an investigation is conducted, to determine the degree and extent of the PAH and metal contamination that remains on the property, and remedial action is taken as necessary to meet all applicable non-industrial soil cleanup standards.

### Residual Soil Contamination

Residual soils remain on the property containing PAHs and metals. If soil is excavated in the future, then pursuant to ch. NR 718 or, if applicable, ch. 289, Stats., and chs. 500 to 536, the property owner at the time of excavation must sample and analyze the excavated soil to determine if residual contamination remains. If sampling confirms that contamination is present the property owner at the time of excavation will need to determine whether the material is considered solid or hazardous waste and ensure that any storage, treatment or disposal is in compliance with applicable standards and rules. In addition, all current and future owners and occupants of the property need to be aware that excavation of the contaminated soil may pose an inhalation or other direct contact hazard and as a result special precautions may need to be taken to prevent a direct contact health threat to humans.

### Residual Groundwater Contamination

Groundwater concentrations of various petroleum-related compounds and metals are greater than enforcement standards set forth in ch. NR140, Wis. Adm. Code. For more detailed information regarding the locations where groundwater samples have been collected (i.e., monitoring well locations) and the associated contaminant concentrations, refer to the Remediation and Redevelopment Program's GIS Registry at the RR Sites Map page at <http://dnr.wi.gov/org/aw/rr/qis/index.htm>.

DNR fact sheet, RR-819, "Continuing Obligations for Environmental Protection" has been included with this letter, to help explain a property owner's responsibility for continuing obligations on their property. You may obtain additional copies at <http://dnr.wi.gov/org/aw/rr/archives/pubs/RR819.pdf>.

### Final VPLE Invoice

A Final invoice will be sent to you under separate cover when the internal work is completed and hours can be finalized.

### Natural Attenuation Insurance

As noted in a previous email to you, the site will require natural attenuation insurance because groundwater contamination at the site exceeds NR 140 Wis. Adm. Code Enforcement Standard Exceedances.

- ❖ REC 16 – Oil USTs (#03-71-415143) → Industrial Land Use must be maintained.
- ❖ REC 18 – Former Finishing Warehouse (#09-71-553639) → investigated and given "No Action Required" (NAR) status. However, maintenance of an engineered cap required over this area based on concentrations related to the site-wide fill (REC 17).

### **Continuing Obligations and Public Notice of Residual Contamination (GIS Registry)**

While the Department considers this case closed, you and future property owners must comply with certain continuing obligations as explained in this letter.

In lieu of a restriction on your Deed, this site will be listed on the Remediation and Redevelopment Program's GIS Registry. The specific reasons are summarized below:

- Residual soil contamination exists that must be properly managed should it be excavated or removed;
- Before the land use may be changed from industrial to non-industrial, additional environmental assessment work may be necessary;
- Pavement, an engineered cover or a soil barrier must be maintained over contaminated soil and the state must approve any changes to this barrier;
- Groundwater contamination is present above Chapter NR 140 enforcement standards;

This letter and information that was submitted with your closure request application will be included on the GIS Registry. To review the sites on the GIS Registry web page, visit the RR Sites Map page at <http://dnr.wi.gov/org/aw/rr/gis/index.htm>. If the property is listed on the GIS Registry because of remaining contamination and you intend to construct or reconstruct a well, you will need prior Department approval in accordance with s. NR 812.09(4)(w), Wis. Adm. Code. To obtain approval, Form 3300-254 needs to be completed and submitted to the DNR Drinking and Groundwater program's regional water supply specialist. This form can be obtained on-line <http://dnr.wi.gov/org/water/dwg/3300254.pdf> or at the web address listed above for the GIS Registry.

#### Cover or Barrier

Pursuant to s. 292.12(2)(a), Wis. Stats., the pavement, building foundation and asphalt/compacted gravel cover that currently exists in the location shown on the attached map shall be maintained in compliance with the attached maintenance plan in order to prevent direct contact with residual soil contamination that might otherwise pose a threat to human health.

#### Prohibited Activities

The following activities are prohibited on any portion of the property where pavement, a building foundation, soil cover, engineered cap or other barrier is required as shown on the attached map, unless prior written approval has been obtained from the Wisconsin Department of Natural Resources: 1) removal of the existing barrier; 2) replacement with another barrier; 3) excavating or grading of the land surface; 4) filling on capped or paved areas; 5) plowing for agricultural cultivation; 6) construction or placement of a building or other structure.

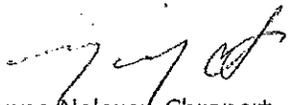
Please submit the application for natural attenuation insurance as soon as possible along with the appropriate fee to the attention of our VPLE Coordinator:

Michael Prager, RR/5  
State of Wisconsin  
Department of Natural Resources  
PO Box 7921  
Madison WI 53707-7921

The application and fee schedule is included for your convenience and can also be found at the following web pages: <http://www.dnr.state.wi.us/org/aw/rr/archives/pubs/4400-224.pdf> (Application Form)  
<http://www.dnr.state.wi.us/org/aw/rr/archives/pubs/RR661.pdf> (Fee schedule)

The Department appreciates your efforts to restore the environment at this site. If you have any questions regarding this closure decision or anything outlined in this letter, please contact Kathy Sylvester at (920) 424-0399.

Sincerely,



Roxanne Nelezen Chronert, Acting Team Supervisor  
Northeast Region Remediation & Redevelopment Program

Attachments:

- Site-Wide Materials Handling and Cap Maintenance Plan for Engineered Barriers, Prepared by Arcadis, dated 10/14/2010
- Figure 3 Extent of Engineered Barriers with the photographic Locations depicting conditions. Prepared by Arcadis, dated 7/2/2010
- PUB-RR-819 Continuing Obligations for Environmental Protection
- PUB-RR-661 Insurance for VPLE sites using Natural Attenuation
- Form 4400-224 Environmental Insurance Application

e-cc: Case File – OSH

Michael Prager – CO

Gary Kjelleren – General Dynamics (via email: [gkjeller@gdatp.com](mailto:gkjeller@gdatp.com))

w/o attachments: Brian Maillet – Arcadis (via email: [bmaillet@arcadis-us.com](mailto:bmaillet@arcadis-us.com))

**Site-Wide Materials Handling and Cap Maintenance Plan for Engineered Barriers**

This Site-Wide Materials Handling and Cap Maintenance Plan for Engineered Barriers ("Plan") is applicable at the Property known as the Former Meritor Facility (Meritor) located at 1005 High Avenue in the city of Oshkosh, Winnebago County, Wisconsin ("Property"), and depicted on Figures 1 and 2. AxleTech International, Inc. (AxleTech) is currently continuing axle manufacturing operations at the Property. AxleTech is currently owned by General Dynamics Armament and Technical Products, Inc. (General Dynamics).

A copy of this Plan shall at all times be kept on file in the offices of: (1) the Wisconsin Department of Natural Resources (WDNR), Northeast Region; (2) the owner of the Property, currently General Dynamics, its successors and assigns (hereinafter identified collectively as the "Owner"); and (3) the Property manager, currently AxleTech (hereinafter identified collectively as the "Property manager"). The Plan shall be made available by the Property manager to contractors, utilities and maintenance personnel, and any other public or private persons or entities authorized to perform excavation work at the Property.

The purpose of this Plan is to describe the procedures and controls that shall be followed to properly manage (1) all unsaturated soils at the Property; (2) Cap elements that are protective of direct contact exposure with unsaturated soils and light non-aqueous phase liquid (LNAPL); (3) Cap elements that mitigate LNAPL migration, and (4) the existing subsurface setting that contains the natural redox gradient between Recognized Environmental Condition (REC) 17 and the Fox River. Unsaturated Soils are hereby defined as the full depth of soils, extending from the ground surface to the water table, which ranges from approximately 2 to 5 feet below ground surface (ft bgs). LNAPL is hereby defined as quench mineral oil that is a primary eye irritant and may be a skin irritant (see attached Material Safety Data Sheet) and has been identified in the subsurface soil vadose zone (approximately 4 to 6 ft bgs) at REC 1- Heat Treating Area, REC 3A- Former Quench Oil Underground Storage Tanks (USTs), and REC 13- Broaches Area.

The Cap elements protective of direct contact exposure are approved engineered barriers which may consist of the facility concrete flooring and foundation, the asphalt and gravel parking lots placed over the unsaturated soils, and any future concrete flooring or foundations, and asphalt or gravel parking surfaces placed over the unsaturated soils. The Cap elements that mitigate LNAPL migration are engineered barriers which consist of the current facility concrete flooring and foundation or any

future flooring, foundation, or pavement. It is understood that the current industrial zoning of the Property is a Cap element. The maintaining of the industrial setting is an administrative requirement of this Plan. The extents of the engineered barriers at the Property are shown on attached Figure 3.

The engineered barriers will be maintained in accordance with the Plan. Maintaining the function of the engineered barriers will continue to limit direct contact exposure with unsaturated soils and LNAPL that may be encountered during construction and maintenance activities at the Property. The engineered barriers will also mitigate LNAPL migration.

The WDNR and its successor and assigns (hereinafter identified collectively as the "Department") shall be notified of any activity that is not in accordance with this Plan.

### **Allowed Activities**

The following allowed activities must comply with all listed requirements:

**A1. Construction or Installation of Buildings, Structures or Other Improvements.** Buildings, structures or other improvements may be constructed or installed on the Property using footings or other foundations that are placed into the unsaturated soils in the following manner:

- A) The contractor performing the work shall be provided a copy of this Plan by the Property manager and shall prepare a health and safety plan, appropriate to the work being performed.
  
- B) All materials used in the pavement or foundation shall not contain any hazardous waste. Unsaturated soils or granular layer materials that are excavated shall be separated and segregated to the extent practicable so that they may be replaced upon completion of the work following proper analytical testing of the soils in accordance with applicable solid waste regulations. Any such excavation of unsaturated soils or granular layer materials shall be conducted in accordance with the health and safety plan. All excavated unsaturated soils shall be, at a minimum, placed onto plastic sheeting and covered, or placed into a watertight container such as a covered roll-off box.

- C) Upon completion of the work, previously excavated unsaturated soils and granular layer materials may be backfilled, provided, however, that the unsaturated soils are not classified as a solid or hazardous waste and the backfilled unsaturated soils maintain the compaction characteristics of the surrounding unsaturated soils. The unsaturated soils or granular layered material, as well as any additional clean soil or granular fill material necessary to backfill to grade, shall be backfilled in such a manner as to maintain the original depth of the unsaturated soils or granular layer material, as the case may be. The following shall be properly characterized and managed in accordance with state law with notice to the Department: 1) any previously excavated unsaturated soils; 2) any excavated granular material that has been commingled, mixed or otherwise in contact with unsaturated soils, which is not backfilled; and 3) any groundwater encountered and removed during construction.
  
- D) A memorandum or report shall be prepared describing the work performed, identifying the person(s) performing the work and the date of the work, and confirming that the Plan was adhered to in completion of the work. A copy of the report shall be kept on file by the Property manager, and shall be filed with the Department.

**A2. Utility Installations or Repairs.** No utility repairs or installation of new or replacement utilities shall be conducted on the Property until after the utility and any contractor(s) for the utility have acknowledged receipt of a copy of this Plan. The utility repairs or installation(s) shall be conducted in strict conformance with the standards set forth below with respect to excavations into and/or beneath the Site, and such excavations are to be undertaken in the following manner:

- A) The contractor performing the work shall be provided with a copy of this Plan by the Property manager and shall prepare a health and safety plan, appropriate to the work being performed.
  
- B) Unsaturated soils or granular layer materials that are excavated, all for purposes of utility installation or repair, shall be separated and segregated to the extent practicable so that they may be replaced upon completion of the work following proper analytical testing of the soils in accordance with applicable solid waste regulations. All excavated unsaturated soils shall be, at a minimum, placed onto

plastic sheeting and covered, or placed into a watertight container such as a covered roll-off box.

- C) Upon completion of such work, the excavated unsaturated soils may be placed back into the excavation, provided, however, that any excavated unsaturated soils placed back into the excavation are not classified as a solid or hazardous waste and that the soils maintain the compaction characteristics of the surrounding unsaturated soils.
- D) Any excavation of unsaturated soils shall be conducted in accordance with the health and safety plan. Any such soils excavated from beneath the unsaturated soils shall be segregated, properly characterized and managed in accordance with state law with notice to the Department. Any other soils which have been commingled, mixed or otherwise have come into contact with soils excavated from beneath unsaturated soils shall be properly characterized and managed in accordance with state law with notice to the Department. Any soils which have been commingled, mixed or otherwise have come into contact with soils excavated from beneath 4 ft bgs at RECs 1, 3A, and 13 and may contain LNAPL shall be properly characterized and managed in accordance with state law with notice to the Department. Any groundwater affected by such activities shall be managed in accordance with state law after notice to the Department.
- E) Clean fill used in connection with utility installation or construction shall not include any granular or porous material, but may include low strength flowable fill or other fill with low hydraulic conductivity.
- F) If the utility installation or construction involves any disturbance of the seals used to seal the entrance of utility lines and the structures, such seals shall be replaced with new seals of like or superior quality.
- G) A memorandum report shall be prepared describing the work performed, identifying the person(s) performing the work and the date of the work, and confirming that the Plan was adhered to in completion of the work. A copy of the report shall be kept on file with the utility, the Property manager, and shall be filed with the Department.

- A3. Offsite Disposal of Excavated Soils.** If it becomes necessary or desirable to dispose of excavated soils from the allowed construction, repair, and installation

activities, the excavation and resulting soils shall be managed in accordance with s. NR 718.13, Wis. Adm. Code.

### Required Activities

**R1. Annual Cap Inspections.** Not less than annually, the Property shall be inspected by the Property manager to ensure that the integrity of the Engineered Barriers is maintained. The condition of the Engineered Barriers is important to protecting human health from direct contact with the underlying residually impacted soils. The Engineered Barriers can contain cracks, fissures, and shallow holes from normal usage and weather conditions and still be protective of direct contact. Hereafter, 'significant' cracks, fissures, and holes are defined as conditions which would lead to the compromise of the total cap integrity and/or would allow for humans to inadvertently contact the residual impacted soil beneath the Engineered Barriers. Any disturbances of the Engineered Barriers or significant fissures or cracks in the asphalt, gravel, or concrete caps shall be noted. The Engineered Barriers to be inspected are shown on Figure 3.

An engineered barrier inspection form shall be completed by the Property manager which identifies the date of the inspection, the individuals conducting the inspection; any observed disturbances of the Engineered Barriers and any significant fissures or cracks in the asphalt or concrete caps. A copy of the engineered barrier inspection form is attached. All inspection forms shall be maintained on file by the Property manager for a period of 3 years.

**R2. Repairs to Capped Areas.** If, during the annual inspections or other routine inspections of the Property, the Engineered Barriers (see Figure 3) are observed to have been disturbed or significant fissures, cracks or erosional features are observed in the asphalt, gravel, or concrete caps, the Property manager shall arrange to have repairs made to such areas, in a manner consistent with section A1 of this Plan. Such repairs shall be carried out within a reasonable period of time subject to weather and seasonal considerations. All repairs shall be documented on the attached work order form, which will be maintained on file by the Property manager.

**R3. Maintaining the Natural Redox Gradient.** The existing subsurface setting located between the Engineered Barrier for REC 17 and the Fox River shall be maintained to ensure the existing natural redox gradient continues to precipitate dissolved barium from groundwater to regulatory levels that are acceptable to

ARCADIS

**Site-Wide Materials  
Handling and Cap  
Maintenance Plan for  
Engineered Barriers**

Former Meritor Facility  
1005 High Avenue  
Oshkosh, Wisconsin  
BRRTS # 06-71-517594

the WDNR. Repairs and maintenance of the surface grade, including the existing jogging trail, are acceptable under this Plan.

**Request for Deviations**

The Property manager and Owner shall not conduct any activities at Property that are not in compliance with this Plan, unless written approval to do so is obtained from the Department.



## ADDENDUM "A" - LEGAL DESCRIPTION

### Parcel No. 1:

Lots 7 and 15 and that part of Lots 22 and 23 lying Westerly or Southwesterly of the Right of Way of the Chicago and Northwestern Railway, and on which the main track of said Railway Company, through aforementioned Lots, is located and part of Lots 16 and 17, all in Assessor's Plat (Axle) Fifth Ward, City of Oshkosh, Winnebago County, Wisconsin, excepting therefrom rail road rights of way, as now located.

### Parcel No. 2

Lots 14, 18, 19 and 24, all in Assessor's Plat (Axle), Fifth Ward, City of Oshkosh, excepting therefrom rail road rights of way, as now occupied.

### Parcel No. 3:

That Part of Lots 16, 17 and 23 all in Assessor's Plat (Axle), Fifth Ward, City of Oshkosh, described as follows: VIZ.:

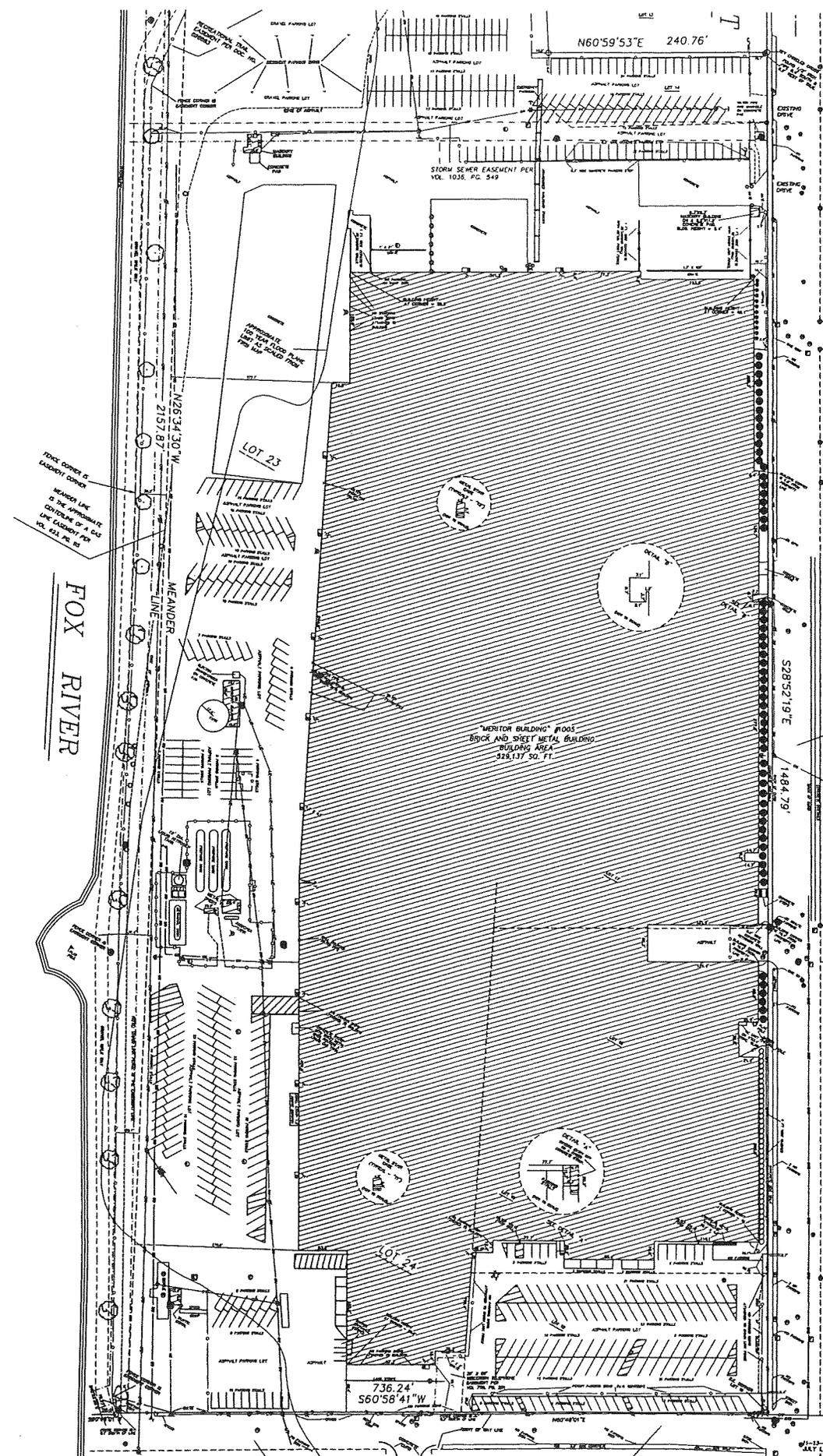
Commencing on the Northerly or Northwesterly Line of New Street (later known as Forest Avenue), as per Leach's Map of 1894, at the point of intersection with the Westerly line of the right of way of the Chicago and Northwestern Railway Company, and on which the main track of said railway company through aforementioned Lots is located, thence Northwesterly along the Westerly line of said Right of Way to point of intersection with the extended most Northwesterly line of Property owned and occupied by the Timken-Detroit Axle Company, and more particularly described in Deed recorded in Winnebago County Registry, in Volume 450 of Deeds on pages 278 to 281 inclusive, thence Northeasterly to the most Westerly corner of property of the Timken-Detroit Axle Company, as aforementioned, thence Northeasterly 83 feet to an iron corner thence Southeasterly 22 feet to an iron corner, thence Northeasterly 51.7 feet to an iron corner, thence Southeasterly 62.1 feet to an iron corner, thence Northeasterly 130 feet to a point on the Westerly or Southwesterly line of High Street, 387.5 feet Northwesterly of the point of intersection of said Westerly line of High Street with the Northerly line of aforementioned New Street (last 5 directions constituting the division line between lands occupied by the Timken-Detroit Axle Company, and claimed by virtue of Deeds recorded in Winnebago County Registry, in Volume 450 on pages 278 to 281 inclusive, and in Volume 501 on pages 209 and 210), thence Southeasterly along the Westerly line of High Street, 387.5 feet to point of intersection with the Northerly line of aforementioned New Street, thence Southwesterly along the Northerly line of the aforementioned New Street, to the place of beginning, excepting therefrom rail road rights of way, as now occupied.

### Parcel No. 4:

All that tract of parcel of land being Lot Twenty-two (22) in the Assessor's Plat (Axle) Fifth Ward, City of Oshkosh, County of Winnebago, State of Wisconsin, less and except the following described tract of land:

Commencing at the Southeasterly (most Easterly) corner of Lot Twenty-one (21) in said Plat; thence Southwesterly, at right angles to the Northeasterly line of said Lot Twenty-one (21) to the Northeasterly Bank of the Fox River; thence Northwesterly, along the Northeasterly bank of said river, to the Northerly line of said Lot Twenty-two (22) (said line being the Southerly line of said Lot Twenty-one (21)); thence Easterly, along the Northerly line of said Lot Twenty-two (22), to the place of beginning.

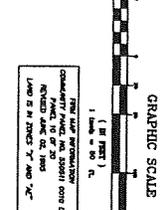




- ① REDUCED PRICE  
 ② SANDWICH PANELS  
 ③ STORM SEWER  
 ④ REINFORCED CONCRETE  
 ⑤ AIR CHANGING  
 ⑥ BRICK PAVEMENT  
 ⑦ CEMENT ASPHALT  
 ⑧ FINE ASPHALT  
 ⑨ SAND ASPHALT  
 ⑩ ROAD & SIDEWALK  
 ⑪ SIDEWALK  
 ⑫ SIDEWALK  
 ⑬ SIDEWALK  
 ⑭ SIDEWALK  
 ⑮ SIDEWALK  
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 ㊿ SIDEWALK

HIGH AVENUE (WIDE OF RIV. WALK)  
 S28°52'19"E 1484.79'  
 ROCKLAND AVE. 40 FT.

ROCKLAND AVE. 40 FT.



6/11-12-02 REVISIONS PER ALTHEIMER AND GRAY  
 VARY & COE (ARCH) BRACKENRIDGE FENCED TO LOT LINE  
 DATE 10/20/02

**ROEHLIG**  
**LAND SURVEYING**  
**&**  
**CONSULTING LTD.**  
 A Division of R.A. Smith and Associates  
 2800 Outwater Street • Oakbrook, IL • 60464  
 (630) 223-2884

**ALTA SURVEY**  
 SHEET 2 OF 2

FOX COVER IS  
 FACTORY COVER  
 MEANDER LINE  
 IS THE APPROXIMATE  
 COURSE OF A GAS  
 LINE, GROUND FOR  
 VOL. 624, PG. 87

ALL DIMENSIONS  
 ARE IN FEET  
 UNLESS OTHERWISE  
 SPECIFIED



2135 W. Maple Rd.  
Troy, MI 48084

arvinmeritor.com

February 17, 2009

Gary A. Peters  
Howard & Howard Attorneys, PLLC  
450 West Fourth Street  
Royal Oak, Michigan 48067-2557

Mr. Peters:

**Re: Responsible Party Statement  
1005 High Avenue Oshkosh, Wisconsin**

The legal description of the subject property, provided herein as Addendum A to the Warranty Deed (Winnebago County, Wisconsin Register of Deeds Document No. 1224631 recorded January 14, 2003 at 10:44AM), is accurate to the best of my knowledge of the metes and bounds description of the land, which has conditions of impacted soils and groundwater. The land described in said Addendum A is the same as that delineated on the enclosed plat of survey made by Roehlig Land Surveying & Consulting, Ltd. entitled Job 3928A dated November 13, 2002.

Sincerely,

David A. O'Connor  
Corporate Environmental Manager  
Meritor Heavy Vehicle Systems, LLC Representative



Oshkosh Warranty  
Deed for Real Estate



Oshkosh Plat of  
Survey 1 of 2



Oshkosh Plat of  
Survey 2 of 2

Enclosures

cc: Gary Kjelleren, General Dynamics  
Jim Bannantine, ARCADIS  
Brian Maillet, ARCADIS

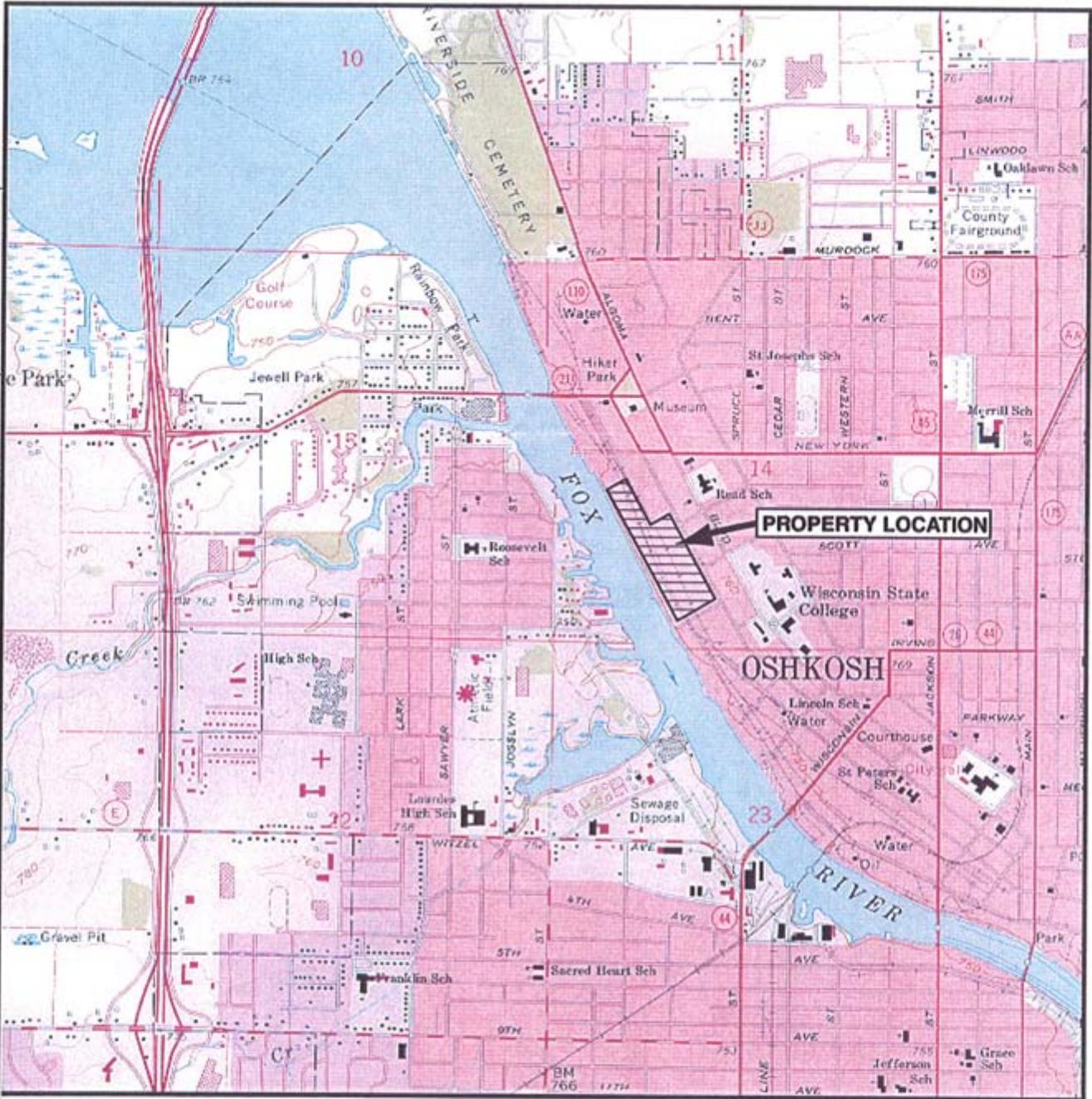
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APPROVED:

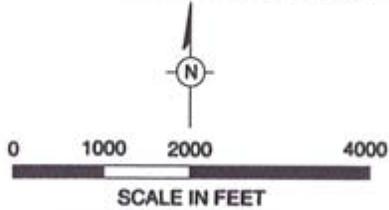
CHECKED: JEB  
FILE NO.: GRAPHICS  
DRAWING: SITE\_LOC\_2.A

PN: WYNNCHRCW10928MERITOR-OSHKOSH

DWG DATE: 30JAN09



SOURCE: USGS 7.5 Minute Topographic Map, OSHKOSH, WISCONSIN Quadrangle, 1975



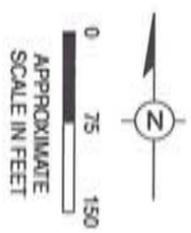
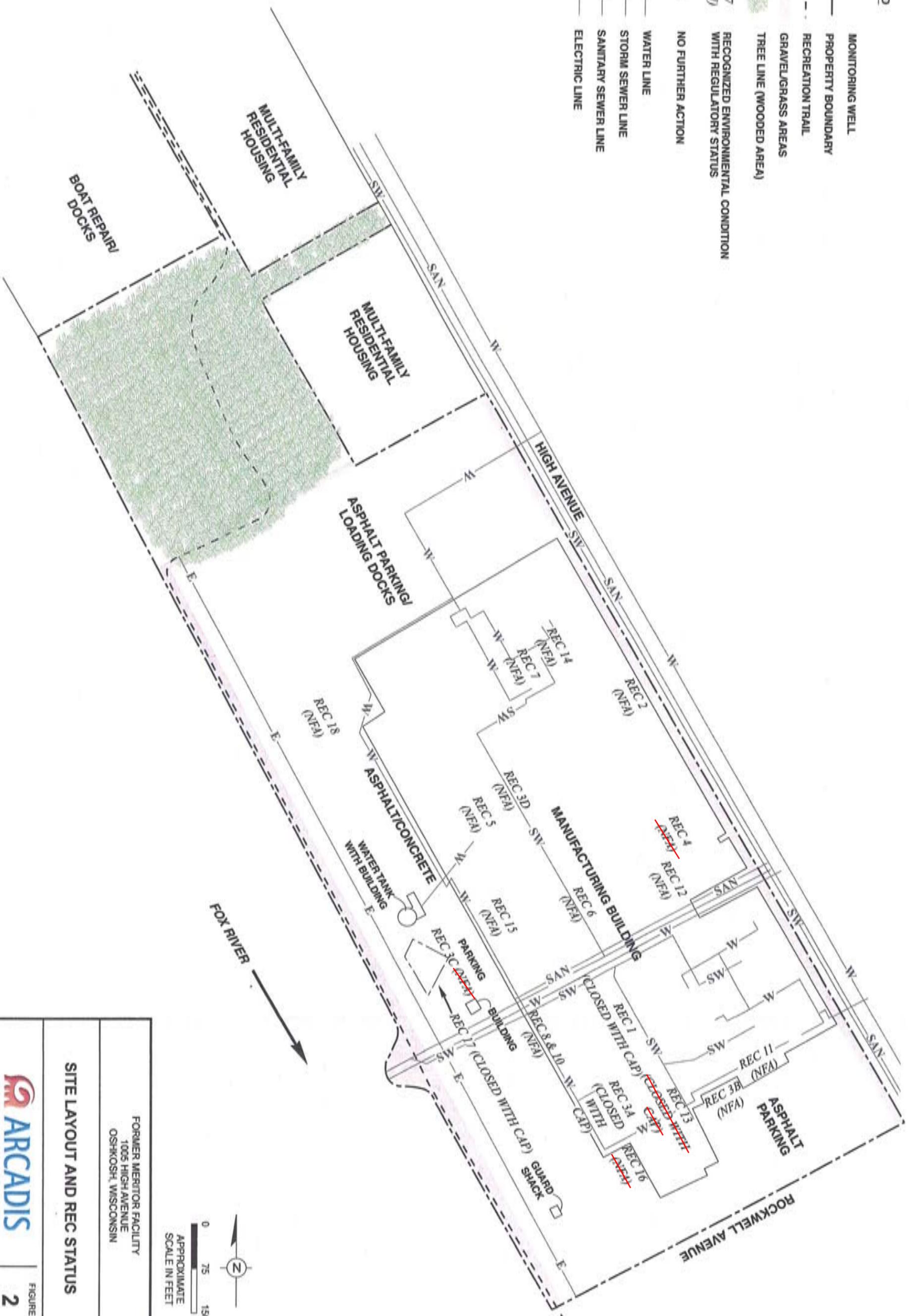
**PROPERTY LOCATION MAP**

FORMER MERITOR FACILITY  
1005 HIGH AVENUE  
OSHKOSH, WISCONSIN

FIGURE

**1**

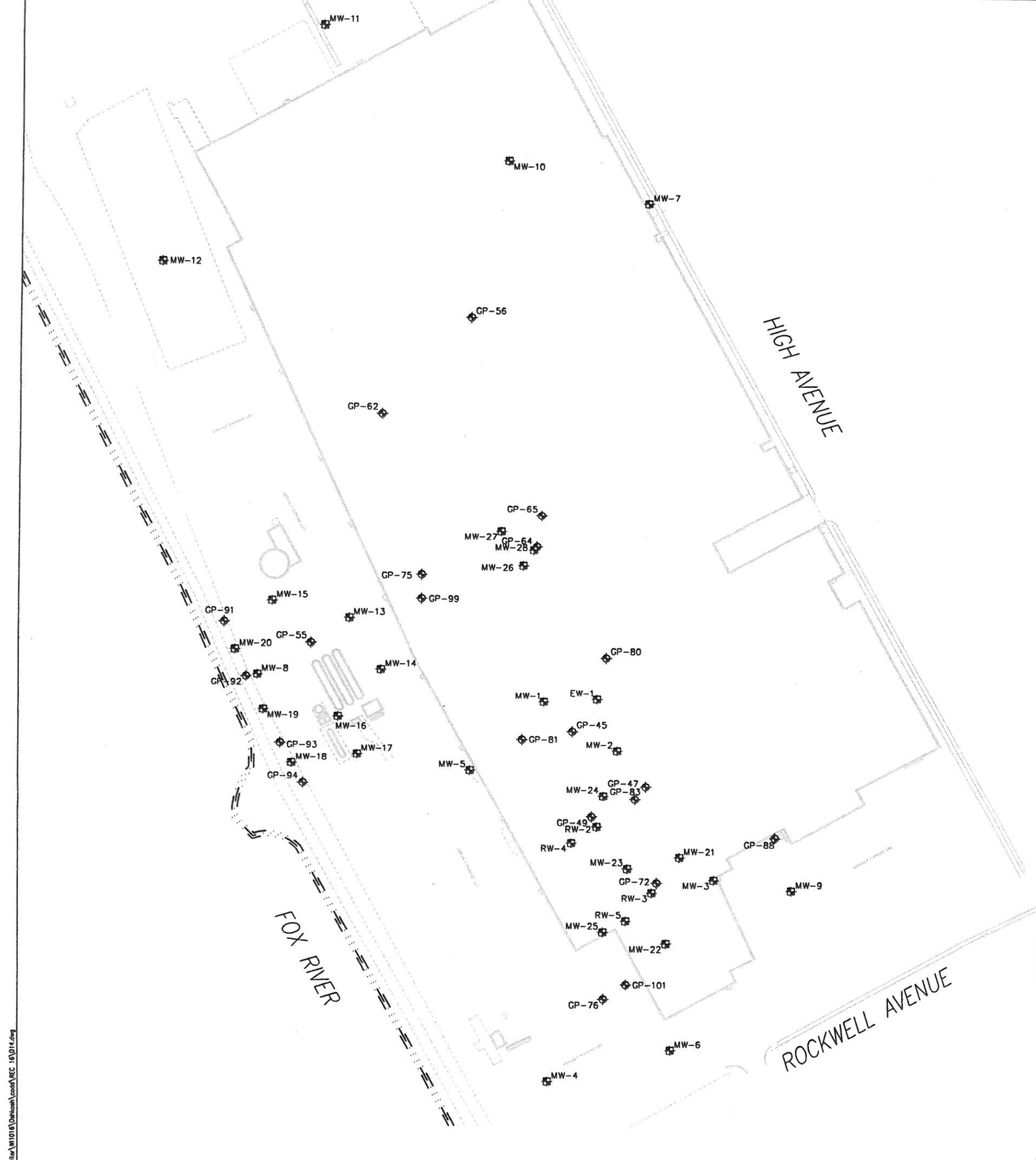
- LEGEND**
- MONITORING WELL
  - PROPERTY BOUNDARY
  - - - RECREATION TRAIL
  - GRAVEL/GRASS AREAS
  - TREE LINE (WOODED AREA)
  - REC 17 (OPEN) RECOGNIZED ENVIRONMENTAL CONDITION WITH REGULATORY STATUS
  - (NEA) NO FURTHER ACTION
  - W WATER LINE
  - SW STORM SEWER LINE
  - SAN SANITARY SEWER LINE
  - E ELECTRIC LINE



FORMER MERITOR FACILITY  
 1005 HIGH AVENUE  
 OSHKOSH, WISCONSIN

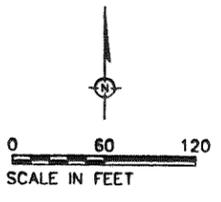
**SITE LAYOUT AND REC STATUS**





**LEGEND**

- ◆ GP-76 PERMANENT GEOPROBE WELL
- MW-1 MONITORING WELL



**NOTES**

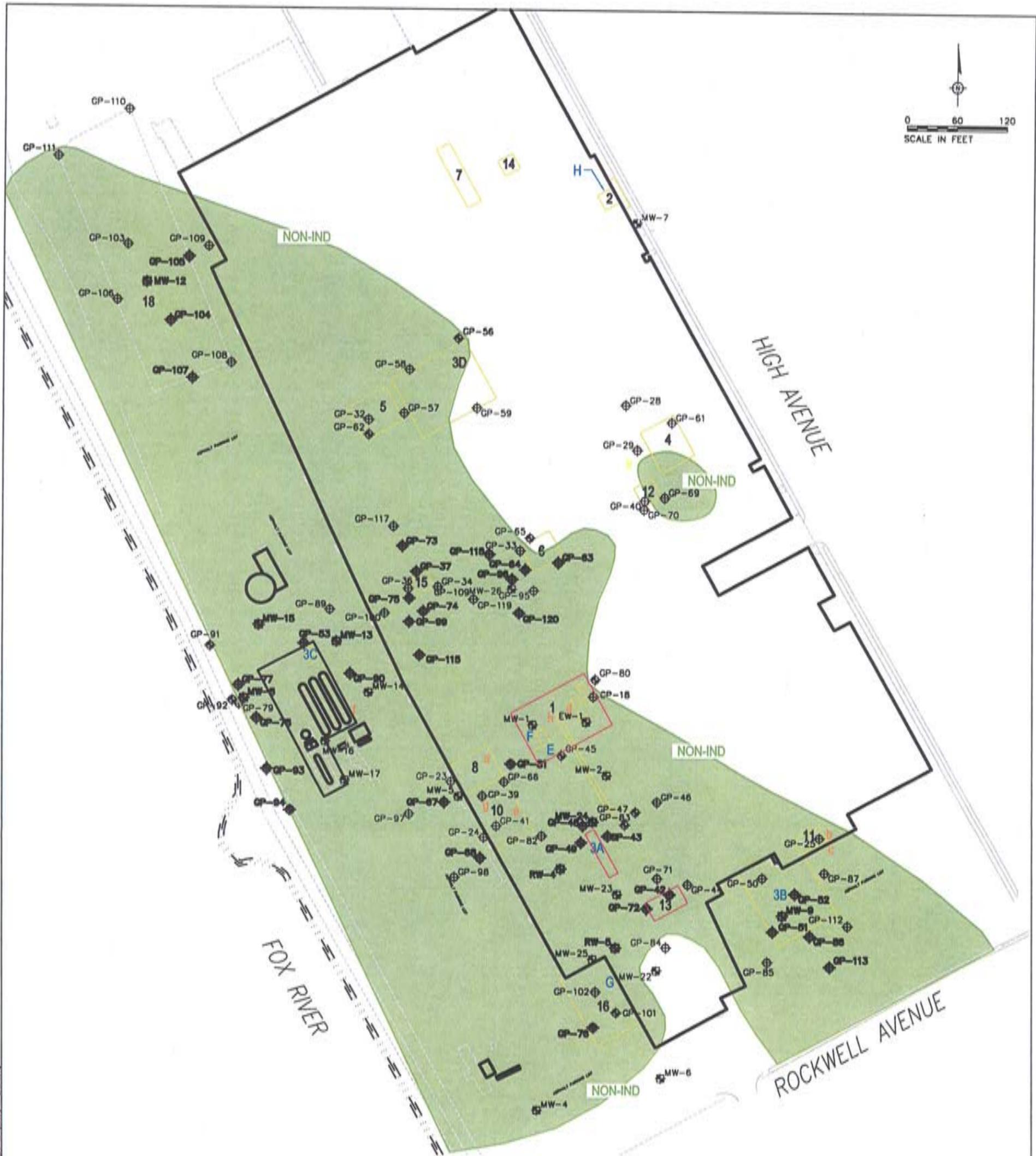
1. BASE MAP DEVELOPED FROM A DRAWING BY NATIONAL SURVEY & ENGINEERING TITLED, "MONITORING WELL EXHIBIT," DATED JUNE 15, 2006.

User Name : masonjenn; Acad Version : RTLEGS; Date/Time : Tue, 13 Jul 2010 - 12:31pm; Current Plotstyle : ByColor; Page Setup: CAMON-11K17; Plot Name : C:\proj\project\Monitor\101010\Drawings\Locat\VEC\_101010.dwg

Area Manager <b>M. MARBLE</b>	 120 North Jefferson Street, Suite 400 Milwaukee, Wisconsin 53202 Tel: 414-278-7700 Fax: 414-278-7000 www.arcadis-us.com
Project Director <b>E. BUC</b>	
Tech Manager <b>B. MARLEY</b>	
Technical Director <b>T. REVERSH</b>	

**LOCATIONS OF NR 141 COMPLIANT MONITORING WELLS  
AND PERMANENT GEOPROBE WELLS**  
  
**FORMER MERITOR FACILITY**  
 1005 HIGH AVENUE  
 OSHKOSH, WISCONSIN

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**LEGEND**

- GP-4 GEOPROBE BORING
- GP-76 GEOPROBE BORING/MONITORING WELL
- MW-1 MONITORING WELL

NON-IND  
BORING/AREA CONTAINS ONE OR MORE PAH EXCEEDANCE OF GENERIC NON-INDUSTRIAL (NON-IND) DIRECT CONTACT RCLs

**RECOGNIZED ENVIRONMENTAL CONDITIONS**

- 1 HEAT TREATING AREA TUNNEL, QUENCH OIL TANKS AND PITS
- 2 ASSEMBLY AREA
- 3 REMOVED USTs
  - A FIVE 4,000-GALLON QUENCH OIL STORAGE
  - B ONE 2,000-GALLON WASTE OIL
  - C ONE 5,000-GALLON FUEL OIL
  - D FOUR 40-GALLON COOLANT
- 4 HORIZONTAL MACHINING CENTERS (HMCs)
- 5 VERTICAL TURNING LATHES (VTLs)
- 6 RADIAL DRILL COOLANT PIT
- 7 PAINT BOOTH AREA
- 8 FLAMMABLE LIQUIDS AND HAZARDOUS WASTE STORAGE AREA
- 9 BOILER ROOM
- 10 CHEMICAL AND UNIVERSAL WASTE STORAGE
- 11 COOLANT MIXING ROOM
- 12 AIR COMPRESSOR ROOM
- 13 SOUTHERN BROACHES
- 14 ELEVATOR PIT
- 15 EX-CELL-O VTL
- 16 OIL USTs
- 17 FILL MATERIAL
- 18 FORMER FINISHED PRODUCTS WAREHOUSE

**UNDERGROUND STORAGE TANKS**

- 3A FIVE 4,000-GALLON QUENCH OIL STORAGE
- 3B ONE 2,000-GALLON WASTE OIL
- 3C ONE 5,000-GALLON FUEL OIL
- 3D FOUR 40-GALLON COOLANT
- E ONE 10,000-GALLON TANK - QUENCH OIL (COMBINED WITH REC 1)
- F ONE 1,500-GALLON TANK - RESERVE QUENCH OIL (COMBINED WITH REC 1)
- G TWO 8,000-GALLON, FOUR 4,000-GALLON, AND ONE 2,000-GALLON TANKS - OIL STORAGE (REC16)
- H TWO 4,000-GALLON TANKS - GEAR LUBE (REC 2)

**ABOVEGROUND STORAGE TANKS**

- a THREE 450-GALLON TANKS - OIL (REC 8)
- b ONE 2,000-GALLON TANK - COOLANT (REC 11)
- c ONE 500-GALLON TANK - MINERAL SPIRITS (REC 11)
- d TWO 350-GALLON TANKS, ONE 600-GALLON TANK, ONE 600-GALLON TANK - QUENCH OIL (REC 1)
- e SIX 800-GALLON TANKS - WASTEWATER STORAGE (REC 10)
- f THREE 30,000-GALLON TANKS - PROPANE, ONE 11,000-GALLON TANK - METHANOL, ONE 1,000-GALLON TANK - AMMONIA
- g TWO 1,000-GALLON TANKS - WASTE OIL (REC 10)
- h ONE 7,000-GALLON TANK, THREE 1,200 GALLON TANKS, TWO 1,000-GALLON TANKS, AND TWO 800-GALLON TANKS - QUENCH OIL (REC 1)

**NOTES**

1. BASE MAP DEVELOPED FROM A DRAWING BY NATIONAL SURVEY & ENGINEERING TITLED, "MONITORING WELL EXHIBIT," DATED JUNE 15, 2006.

Legend: This Legend is for the map titled "Extent of Individual PAH Exceedances of Generic Non-Industrial Direct Contact Standards" at the former Meritor facility, 1005 High Avenue, Oshkosh, Wisconsin. The map was prepared by Arcadis Environmental Services, Inc. on 7/2/10. The map is based on data provided by the Wisconsin Department of Natural Resources. The map is not to be used for any purpose other than that for which it was prepared.

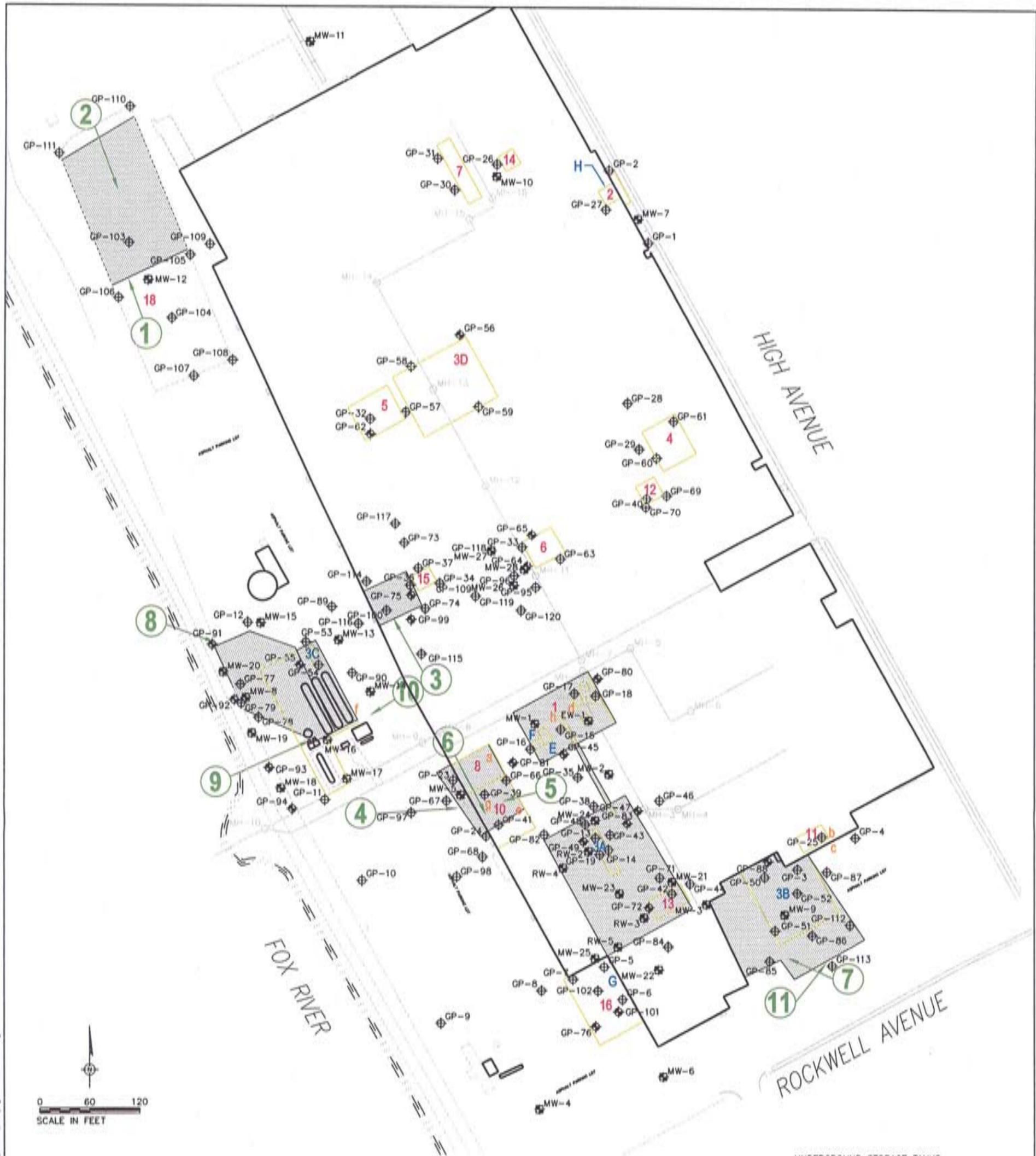
Area Manager <b>M. MARPLE</b>	<p>120 North Jefferson Street, Suite 400 Milwaukee, Wisconsin 53202 Tel: 414-276-7700 Fax: 414-276-7000 www.arcadis-usa.com</p>
Project Director <b>E. BIRD</b>	
Task Manager <b>B. MARLEY</b>	
Technical Reviewer <b>T. NEVINS</b>	

**EXTENT OF INDIVIDUAL PAH EXCEEDANCES  
OF GENERIC NON-INDUSTRIAL  
DIRECT CONTACT STANDARDS  
FORMER MERITOR FACILITY  
1005 HIGH AVENUE  
OSHKOSH, WISCONSIN**

Project Number	W001016
Date	7/2/10
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- LEGEND**
- ⊕ GP-4 GEOPROBE BORING
  - ⊕ GP-76 GEOPROBE BORING/MONITORING WELL
  - ⊕ MW-1 MONITORING WELL
  - MH-8 MANHOLE
  - STORM SEWER LINE
  - ▨ EXTENT OF ENGINEERED BARRIER
  - ④ ENGINEERED BARRIER CONDITION (SEE PHOTOGRAPHIC LOG)

**NOTES**

1. BASE MAP DEVELOPED FROM A DRAWING BY NATIONAL SURVEY & ENGINEERING TITLED, "MONITORING WELL EXHIBIT," DATED JUNE 15, 2006.

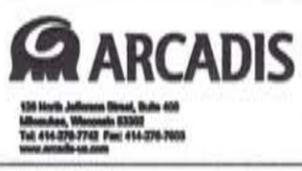
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- 2 ASSEMBLY AREA
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- 9 BOILER ROOM
- 10 CHEMICAL AND UNIVERSAL WASTE STORAGE
- 11 COOLANT MIXING ROOM
- 12 AIR COMPRESSOR ROOM
- 13 SOUTHERN BROACHES
- 14 ELEVATOR PIT
- 15 EX-CELL-O VTL
- 16 OIL USTs
- 17 FILL MATERIAL

**UNDERGROUND STORAGE TANKS**

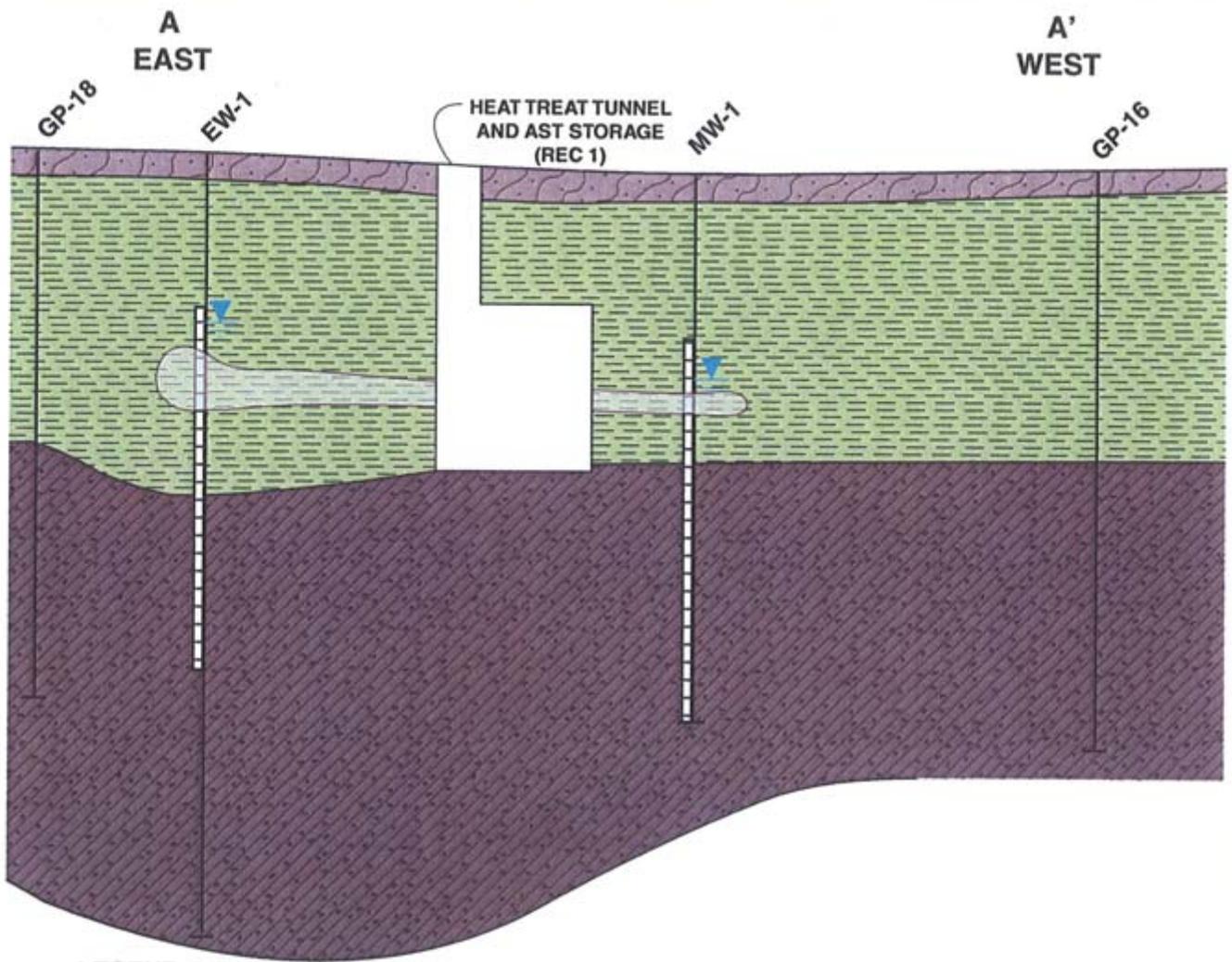
- 3A FIVE 4,000-GALLON QUENCH OIL STORAGE
  - 3B ONE 2,000-GALLON WASTE OIL
  - 3C ONE 5,000-GALLON FUEL OIL
  - 3D FOUR 40-GALLON COOLANT
  - E ONE 10,000-GALLON TANK - QUENCH OIL (COMBINED WITH REC 1)
  - F ONE 1,500-GALLON TANK - RESERVE QUENCH OIL (COMBINED WITH REC 1)
  - G TWO 8,000-GALLON, FOUR 4,000-GALLON, AND ONE 2,000-GALLON TANKS - OIL STORAGE (REC 16)
  - H TWO 4,000-GALLON TANKS - GEAR LUBE (REC 2)
- ABOVEGROUND STORAGE TANKS**
- a THREE 450-GALLON TANKS - OIL (REC 8)
  - b ONE 2,000-GALLON TANK - COOLANT (REC 11)
  - c ONE 500-GALLON TANK - MINERAL SPIRITS (REC 11)
  - d TWO 350-GALLON TANKS, ONE 600-GALLON TANK, ONE 600-GALLON TANK - QUENCH OIL (REC 1)
  - e SIX 800-GALLON TANKS - WASTEWATER STORAGE (REC 10)
  - f THREE 30,000-GALLON TANKS - PROPANE, ONE 11,000-GALLON TANK - METHANOL, ONE 1,000-GALLON TANK - AMMONIA
  - g TWO 1,000-GALLON TANKS - WASTE OIL (REC 10)
  - h ONE 7,000-GALLON TANK, THREE 1,200 GALLON TANKS, TWO 1,000-GALLON TANKS, AND TWO 800-GALLON TANKS - QUENCH OIL (REC 1)

Project Name: 1005 High Avenue Former Meritor Facility  
 Project Number: W001016  
 Date: 7/2/10  
 Scale: 1" = 120'  
 Author: M. Madsen  
 Checker: B. Madsen  
 Title: Environmental Engineer  
 Company: ARCADIS



**EXTENT OF ENGINEERED BARRIERS WITH THE PHOTOGRAPHIC LOCATIONS DEPICTING CONDITION**  
**FORMER MERITOR FACILITY**  
**1005 HIGH AVENUE**  
**OSHKOSH, WISCONSIN**

Project Number	W001016
Date	7/2/10
Page	29



**LEGEND**

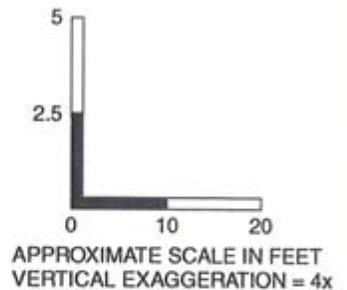
-  **Fill Material:** dark brown to light brown silt with gravel, trace silty clay and sands, and organics (i.e., wood chips).
-  **Dark grey silty clay with yellowish brown silt.**
-  **Concrete Building Foundation**
-  **Probable Extent of Residual Product Impacts**



**WATER LEVEL 5/10**



**MONITORING WELL SCREEN**

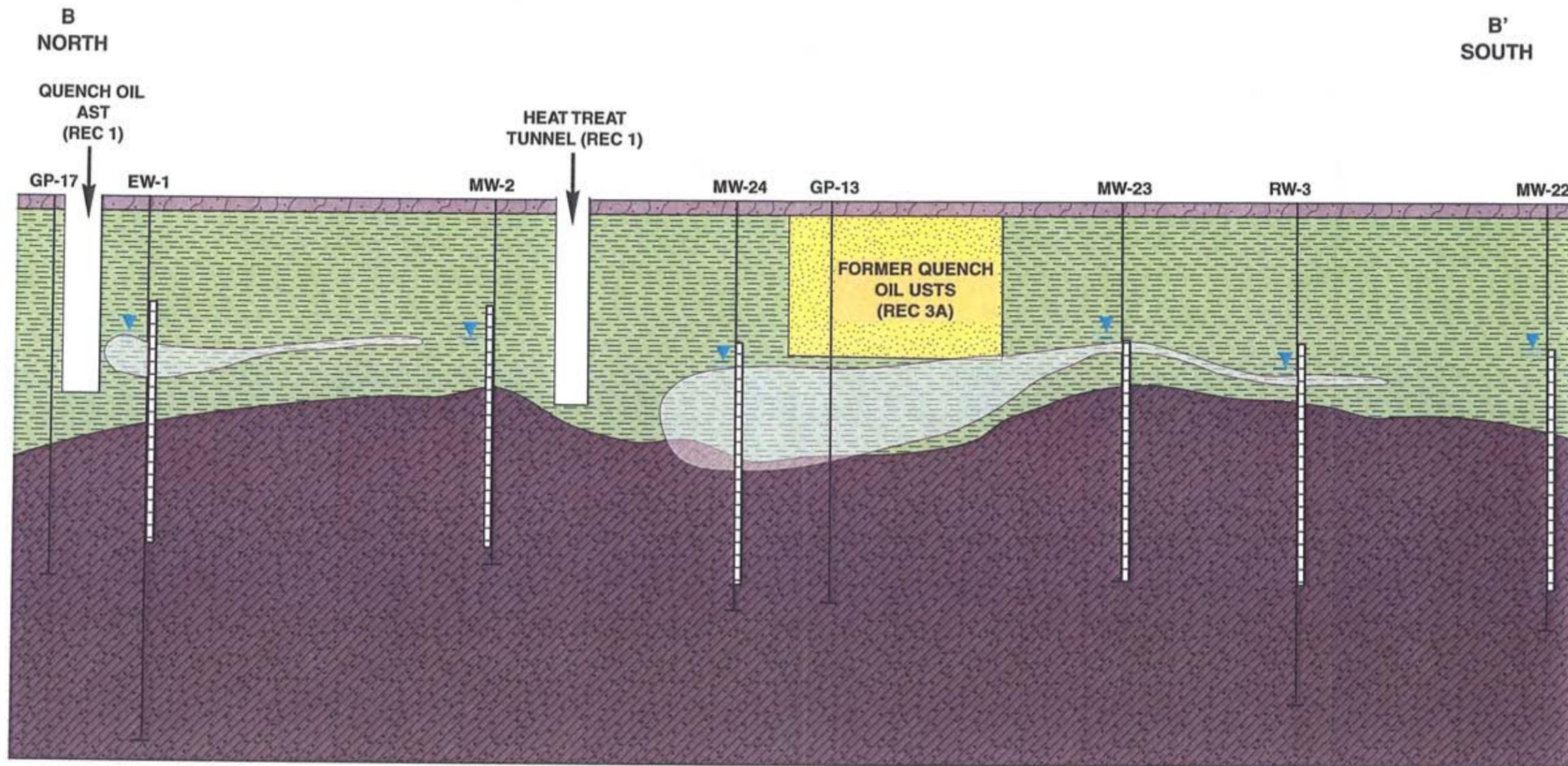


FORMER MERITOR FACILITY  
1005 HIGH AVENUE  
OSHKOSH, WISCONSIN

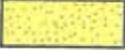
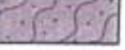
**EASTWEST GEOLOGIC CROSS-SECTION OF REC 1**

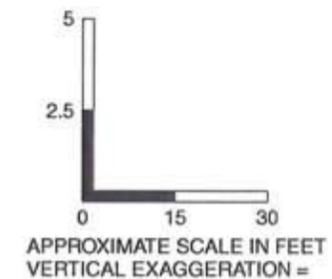


FIGURE  
**17**



**LEGEND**

-  **Sandy Back Fill**
-  **Fill Material: dark brown to light brown silt with gravel, trace silty clay and sands, and organics (i.e., wood chips).**
-  **Dark grey silty clay with yellowish brown silt.**
-  **Concrete Building Foundation**
-  **Probable Extent of Residual Product Impacts**



FORMER MERITOR FACILITY  
1005 HIGH AVENUE  
OSHKOSH, WISCONSIN

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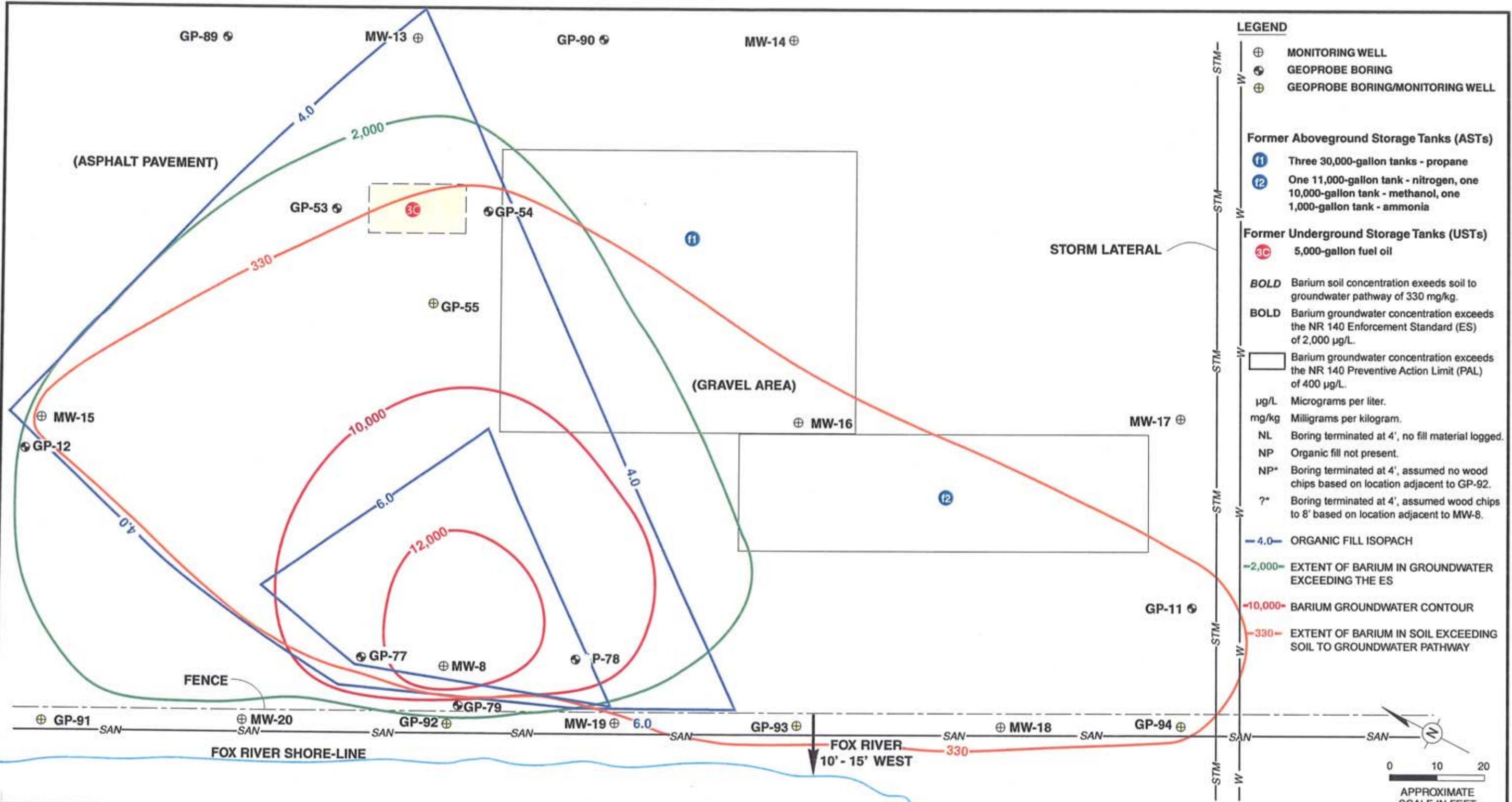
**NORTH/SOUTH GEOLOGIC CROSS-SECTION  
OF REC 1, REC 3A, AND REC 13**

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 **ARCADIS**

FIGURE  
**18**

02JULY10ENVIRONMENTALM&MB MERITORW1010SHKOSHGRAPHICS/NORTH SOUTH XSEC.A1



- LEGEND**
- ⊕ MONITORING WELL
  - ⊕ GEOPROBE BORING
  - ⊕ GEOPROBE BORING/MONITORING WELL

- Former Aboveground Storage Tanks (ASTs)**
- f1 Three 30,000-gallon tanks - propane
  - f2 One 11,000-gallon tank - nitrogen, one 10,000-gallon tank - methanol, one 1,000-gallon tank - ammonia

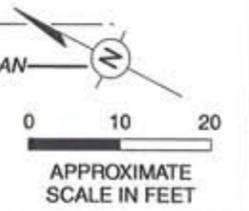
- Former Underground Storage Tanks (USTs)**
- 3C 5,000-gallon fuel oil

- BOLD** Barium soil concentration exceeds soil to groundwater pathway of 330 mg/kg.  
**BOLD** Barium groundwater concentration exceeds the NR 140 Enforcement Standard (ES) of 2,000 µg/L.

- Barium groundwater concentration exceeds the NR 140 Preventive Action Limit (PAL) of 400 µg/L.

- µg/L Micrograms per liter.
- mg/kg Milligrams per kilogram.
- NL Boring terminated at 4', no fill material logged.
- NP Organic fill not present.
- NP\* Boring terminated at 4', assumed no wood chips based on location adjacent to GP-92.
- ?\* Boring terminated at 4', assumed wood chips to 8' based on location adjacent to MW-8.

- 4.0 ORGANIC FILL ISOPACH
- 2,000 EXTENT OF BARIUM IN GROUNDWATER EXCEEDING THE ES
- 10,000 BARIUM GROUNDWATER CONTOUR
- 330 EXTENT OF BARIUM IN SOIL EXCEEDING SOIL TO GROUNDWATER PATHWAY



	MW-8	MW-13	MW-14	MW-15	MW-16	MW-17	MW-18	MW-19	MW-20	GP-11	GP-12	GP-53	GP-54	GP-55	GP-77	GP-78	GP-79	GP-89	GP-90	GP-91	GP-92	GP-93	GP-94	
<b>Barium in Soil (mg/kg)</b>																								
Depth 0-2'	--	--	--	--	--	--	100	--	--	--	110	82	--	--	--	--	--	--	--	--	--	--	--	470
Depth Interval 2-4'	<b>1,660</b>	190	65	<b>750</b>	110	88	--	83	22	<b>2,820</b>	--	140	<b>2,300</b>	--	<b>1,100</b>	<b>2,300</b>	58	110	110	59	12	12	--	
Depth Interval 4-8'	--	130	0.27	<b>470</b>	<b>870</b>	54	<b>370</b>	100	13	--	--	--	--	--	--	--	--	100	54	99	6.3	<b>740*</b>	77	
Depth Interval > 8'	--	59	59	38	68	55	--	--	--	--	209	--	--	--	--	--	--	--	64	14	55	17	--	
<b>Barium in Groundwater (µg/L)</b>																								
Dissolved Barium	12,000	340	2,300	<b>450</b>	270	180	<b>610</b>	8,100	<b>880</b>	710	650													
Total Barium	12,000	340	2,300	<b>450</b>	270	180	<b>610</b>	8,100	<b>880</b>	710	650													
<b>Methane in Groundwater (µg/L)</b>	12,500	12,400	9,840	8,300	11,100	8,010	7,900	12,600	10,600	10,500	12,800													
<b>Fill Material</b>																								
Organic Fill Description	Wood chips, Sawdust	Wood chips, sand	Wood chips, Peat	Wood chips in clay	Wood chips	Wood chips	NP	Wood chips	Wood chips in sand	NP	Wood chips													
Fill Interval/Thickness	3-8'	4-8'	4-8.5'	5.5-8'	4-4'	3.5-6'	NP	4.5-8'	4-5.5'	NP	5-8'													
Fill Thickness	5'	4'	4.5'	2.5'	2'	2.5'	NP	3.5'	1.5'	NP	3'													

FORMER MERITOR FACILITY  
1005 HIGH AVENUE  
OSHKOSH, WISCONSIN

**EXTENT OF FILL AND BARIUM IMPACTED SOIL AND GROUNDWATER AT REC 17**

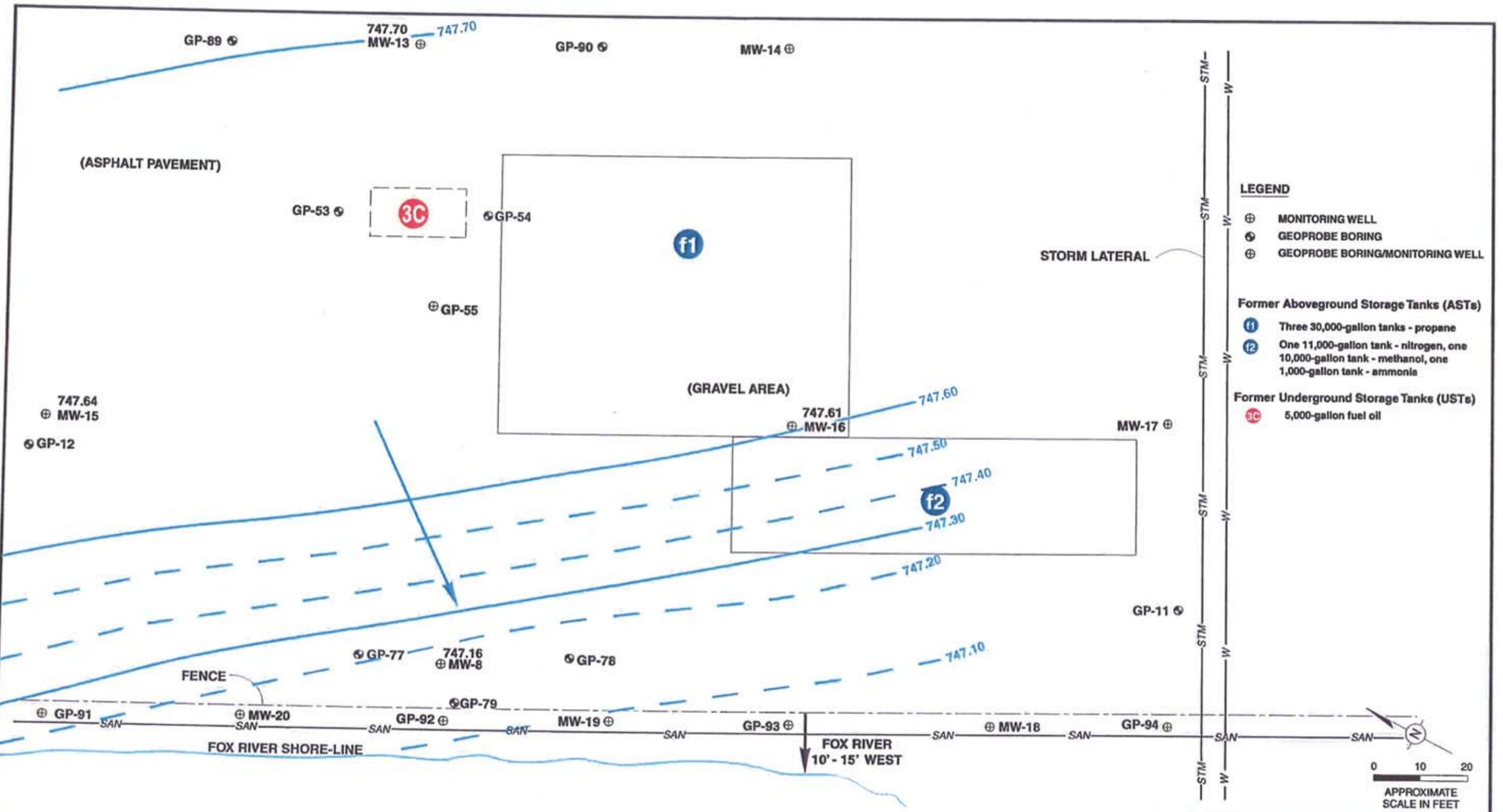
**ARCADIS**

FIGURE  
**26**

01 JULY 2010 ENVIRONMENTAL M/L/M/B MERITOR W/ID165 OSHKOSH BARIUM CON REC 17\_389\_0310\_3.A1



03ALUC09-ENVIRONMENT-RLM  
MERITOR\RM1016\OSHKOSH\GRAPHICS\BARILUM CON REC 17\_345\_0310.A1



- LEGEND**
- ⊕ MONITORING WELL
  - ⊕ GEOPROBE BORING
  - ⊕ GEOPROBE BORING/MONITORING WELL
- Former Aboveground Storage Tanks (ASTs)**
- f1 Three 30,000-gallon tanks - propane
  - f2 One 11,000-gallon tank - nitrogen, one 10,000-gallon tank - methanol, one 1,000-gallon tank - ammonia
- Former Underground Storage Tanks (USTs)**
- 3C 5,000-gallon fuel oil

FORMER MERITOR FACILITY  
1005 HIGH AVENUE  
OSHKOSH, WISCONSIN

**REC 17 GROUNDWATER ELEVATION  
CONTOURS AND FLOW DIRECTION  
NOVEMBER 19, 2009**

**ARCADIS**

FIGURE  
25

Table 2. Comparison of Site-Wide Soil Analytical Results to Generic Soil Cleanup Standards, Former Meritor Facility, Oshkosh, Wisconsin.

Sample ID	NR 720	NR 720		GP-1 (10-12')	GP-2 (6-8')	GP-3 (4-6')	GP-4 (8-10')	GP-5 (4-6')	GP-6 (6-8')	GP-7 (6-8')
Sample Date	IND DC	NON-IND DC	GW Pathway	11/20/00	11/20/00	11/20/00	11/20/00	11/20/00	11/20/00	11/20/00
DRO (mg/kg)	--	--	100	<1.0	3.8 Q	37	26	47	<1.1	5.8
GRO (mg/kg)	--	--	100	0.8 Q	<0.65	<0.65	3.2	<0.65	1.1 Q	<0.65
<b>VOCs (µg/kg)</b>										
Benzene	--	--	5.5	<11	<13	<14	<13	<15	<11	<13
cis-1,2-Dichloroethene	--	--	--	<11	<13	<14	<13	<15	<11	<13
Ethylbenzene	--	--	2,900	<11	<13	<14	<14	<16	<11	<13
Isopropylbenzene	--	--	--	<13	<16	<17	<17	<19	<14	<16
Methylene Chloride	--	--	--	<45	<55	<58	<57	<64	<47	<54
Naphthalene	--	--	2,700	<31	<37	<39	<39	<43	<32	<37
n-Propylbenzene	--	--	--	<20	<25	<26	<26	<29	<21	<24
p-Isopropyltoluene	--	--	--	<30	<36	<38	<37	<42	<31	<35
sec-Butylbenzene	--	--	--	<20	<24	<25	<25	<28	<21	<24
Toluene	--	--	1,500	<6.3	13 Q	<8.0	51	31	<6.5	<7.5
1,2,4-Trimethylbenzene	--	--	--	<26	<32	<34	<33	<38	<27	<32
1,3,5-Trimethylbenzene	--	--	--	<20	<24	<25	<25	<28	<20	<24
Xylene, -o	--	--	--	NA	NA	NA	NA	NA	NA	NA
Xylenes, -m, -p	--	--	--	NA	NA	NA	NA	NA	NA	NA
Xylenes, Total	--	--	4,100	<22	<27	<29	<28	<32	<23	<27
<b>PAHs (µg/kg)</b>										
Acenaphthene	--	900,000	38,000	NA	NA	NA	NA	NA	NA	NA
Acenaphthylene	--	18,000	700	NA	NA	NA	NA	NA	NA	NA
Anthracene	--	5,000,000	3,000,000	NA	NA	NA	NA	NA	NA	NA
Benzo (a) anthracene	--	88	17,000	NA	NA	NA	NA	NA	NA	NA
Benzo (a) pyrene	--	9	48,000	NA	NA	NA	NA	NA	NA	NA
Benzo (b) fluoranthene	--	88	360,000	NA	NA	NA	NA	NA	NA	NA
Benzo (g,h,i) perylene	--	1,800	6,800,000	NA	NA	NA	NA	NA	NA	NA
Benzo (k) fluoranthene	--	880	870,000	NA	NA	NA	NA	NA	NA	NA
Chrysene	--	8,800	37,000	NA	NA	NA	NA	NA	NA	NA
Dibenzo (a,h) anthracene	--	9	38,000	NA	NA	NA	NA	NA	NA	NA
Fluoranthene	--	600,000	500,000	NA	NA	NA	NA	NA	NA	NA
Fluorene	--	600,000	100,000	NA	NA	NA	NA	NA	NA	NA
Indeno (1,2,3-cd) pyrene	--	88	680,000	NA	NA	NA	NA	NA	NA	NA
1-Methylnaphthalene	--	1,100,000	23,000	NA	NA	NA	NA	NA	NA	NA

Footnotes on Page 2.

Table 2. Comparison of Site-Wide Soil Analytical Results to Generic Soil Cleanup Standards, Former Meritor Facility, Oshkosh, Wisconsin.

Sample ID	NR 720	NR 720		GP-1 (10-12')	GP-2 (6-8')	GP-3 (4-6')	GP-4 (8-10')	GP-5 (4-6')	GP-6 (6-8')	GP-7 (6-8')
Sample Date	IND DC	NON-IND DC	GW Pathway	11/20/00	11/20/00	11/20/00	11/20/00	11/20/00	11/20/00	11/20/00
<b>PAHs (µg/kg) (continued)</b>										
2-Methylnaphthalene	--	600,000	20,000	NA	NA	NA	NA	NA	NA	NA
Naphthalene	--	20,000	400	NA	NA	NA	NA	NA	NA	NA
Phenanthrene	--	18,000	1,800	NA	NA	NA	NA	NA	NA	NA
Pyrene	--	500,000	8,700,000	NA	NA	NA	NA	NA	NA	NA
<b>Metals (mg/kg)</b>										
Antimony	--	--	--	NA	NA	NA	NA	NA	NA	NA
Arsenic	1.6	0.039	--	NA	NA	NA	NA	NA	NA	NA
Barium	--	--	330	NA	NA	NA	NA	NA	NA	NA
Beryllium	--	--	--	NA	NA	NA	NA	NA	NA	NA
Cadmium	510	8	--	NA	NA	NA	NA	NA	NA	NA
Chromium, trivalent	--	16,000	--	NA	NA	NA	NA	NA	NA	NA
Copper	--	--	--	NA	NA	NA	NA	NA	NA	NA
Lead	500	50	--	5.3 Q	22	<b>516</b>	23	21	2.4 Q	13
Mercury	--	--	--	NA	NA	NA	NA	NA	NA	NA
Nickel	--	--	--	NA	NA	NA	NA	NA	NA	NA
Selenium	--	--	--	NA	NA	NA	NA	NA	NA	NA
Silver	--	--	--	NA	NA	NA	NA	NA	NA	NA
Zinc	--	--	--	NA	NA	NA	NA	NA	NA	NA

- Generic regulatory criteria not established.
- Underline Value exceeds NR 720 residual contaminant levels (RCLs) for protection of groundwater.
- Bold** Value exceeds the generic NR 720 industrial direct contact RCLs.
- Box** Value exceeds the generic NR 720 industrial direct contact RCLs.
- DRO Diesel Range Organics.
- GRO Gasoline Range Organics.
- GW Pathway WDNR NR720 RCLs for protection of groundwater or NR 746 residual product (whichever is lesser).
- µg/kg Micrograms per kilogram.
- mg/kg Milligrams per kilogram.
- NA Not analyzed.
- NR720 IND DC WDNR NR720 Generic Industrial Direct Contact RCLs.
- NR720 NON-IND DC WDNR NR720 Generic Non-Industrial Direct Contact RCLs.
- PAHs Polycyclic Aromatic Hydrocarbons.
- Q Sample concentration is less than the practical quantitation limit.
- QU Unquantitated hydrocarbons present outside the reported carbon range.
- RL1 or L1 Report limit raised due to sample matrix effects.
- VOCs Volatile Organic Compounds.

Table 2. Comparison of Site-Wide Soil Analytical Results to Generic Soil Cleanup Standards, Former Meritor Facility, Oshkosh, Wisconsin.

Sample ID	GP-8 (4-6')	GP-9 (4-6')	GP-10 (4-6')	GP-11 (2-4')	GP-12 (8-10')	GP-13 (8-10')	GP-14 (8-10')	GP-15 (6-8')	GP-16 (8-10')	GP-17 (8-10')
Sample Date	11/20/00	11/20/00	11/21/00	11/21/00	11/21/00	11/21/00	11/21/00	11/22/00	11/22/00	11/22/00
DRO (mg/kg)	2,840	68	79	110	201	1,660	9,160	16,200	53	3.6 Q
GRO (mg/kg)	<0.65	86	<0.65	<0.65	<0.65	16	1.6 Q	<13	<0.65	<0.65
<b>VOCs (µg/kg)</b>										
Benzene	<29	<22	<34	<17	<26	<72	<67	<20	<13	<14
cis-1,2-Dichloroethene	<29	<22	<34	<17	<25	<72	<66	29 Q	<13	<14
Ethylbenzene	<30	<23	<35	<18	<26	<75	<69	<21	<14	<14
Isopropylbenzene	<36	<27	<42	<22	<32	<89	<82	<25	<17	<17
Methylene Chloride	<123	<93	<144	<74	<108	<305	<281	<86	<57	<59
Naphthalene	180 Q	<63	<98	165 Q	<73	10,300	1,570	88 Q	<39	<40
n-Propylbenzene	<55	<42	<65	<33	<49	<138	<127	<39	<26	<26
p-Isopropyltoluene	<80	<61	<94	<48	<71	<199	<183	<56	<37	<38
sec-Butylbenzene	<54	<41	<63	<32	<47	<134	<123	<38	<25	<26
Toluene	160	<13	<20	26 Q	<15	80 Q	65 Q	53	45	<8.1
1,2,4-Trimethylbenzene	<72	<54	<84	101 Q	<63	<178	<164	119 Q	<33	<34
1,3,5-Trimethylbenzene	<54	<41	<63	<32	<47	<133	<122	<37	<25	<26
Xylene, -o	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Xylenes, -m, -p	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Xylenes, Total	<61	<46	<71	<36	<53	<151	<139	124 Q	<28	<29
<b>PAHs (µg/kg)</b>										
Acenaphthene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Acenaphthylene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Anthracene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Benzo (a) anthracene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Benzo (a) pyrene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Benzo (b) fluoranthene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Benzo (g,h,i) perylene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Benzo (k) fluoranthene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Chrysene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Dibenzo (a,h) anthracene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Fluoranthene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Fluorene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Indeno (1,2,3-cd) pyrene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1-Methylnaphthalene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

Footnotes on Page 4.

Table 2. Comparison of Site-Wide Soil Analytical Results to Generic Soil Cleanup Standards, Former Meritor Facility, Oshkosh, Wisconsin.

Sample ID	GP-8 (4-6')	GP-9 (4-6')	GP-10 (4-6')	GP-11 (2-4')	GP-12 (8-10')	GP-13 (8-10')	GP-14 (8-10')	GP-15 (6-8')	GP-16 (8-10')	GP-17 (8-10')
Sample Date	11/20/00	11/20/00	11/21/00	11/21/00	11/21/00	11/21/00	11/21/00	11/22/00	11/22/00	11/22/00
<b>PAHs (µg/kg) (continued)</b>										
2-Methylnaphthalene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Naphthalene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Phenanthrene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Pyrene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
<b>Metals (mg/kg)</b>										
Antimony	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Arsenic	NA	NA	NA	<b>2.2 Q</b>	<b>5.1 Q</b>	NA	<b>4.2 Q</b>	NA	<b>2.0 Q</b>	NA
Barium	NA	NA	NA	<u>2820</u>	209	NA	313	NA	<u>415</u>	NA
Beryllium	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Cadmium	NA	NA	NA	1.3 Q	1.9 Q	NA	0.71 Q	NA	0.59 Q	NA
Chromium, trivalent	NA	NA	NA	7.4	15	NA	45	NA	36	NA
Copper	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Lead	NA	14	50	<b>132</b>	<b>81</b>	21	18	<b>145</b>	26	18
Mercury	NA	NA	NA	<0.024	0.060 Q	NA	<0.018	NA	0.37	NA
Nickel	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Selenium	NA	NA	NA	<0.091	<0.13	NA	0.16 Q	NA	0.16 Q	NA
Silver	NA	NA	NA	<0.48	<0.66	NA	<0.36	NA	<0.38	NA
Zinc	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

- Generic regulatory criteria not established.
- Underline Value exceeds NR 720 residual contaminant levels (RCLs) for protection of groundwater.
- Bold** Value exceeds the generic NR 720 industrial direct contact RCLs.
- Box** Value exceeds the generic NR 720 industrial direct contact RCLs.
- DRO Diesel Range Organics.
- GRO Gasoline Range Organics.
- GW Pathway WDNR NR720 RCLs for protection of groundwater or NR 746 residual product (whichever is lesser).
- µg/kg Micrograms per kilogram.
- mg/kg Milligrams per kilogram.
- NA Not analyzed.
- NR720 IND DC WDNR NR720 Generic Industrial Direct Contact RCLs.
- NR720 NON-IND DC WDNR NR720 Generic Non-Industrial Direct Contact RCLs.
- PAHs Polycyclic Aromatic Hydrocarbons.
- Q Sample concentration is less than the practical quantitation limit.
- QU Unquantitated hydrocarbons present outside the reported carbon range.
- RL1 or L1 Report limit raised due to sample matrix effects.
- VOCs Volatile Organic Compounds.

Table 2. Comparison of Site-Wide Soil Analytical Results to Generic Soil Cleanup Standards, Former Meritor Facility, Oshkosh, Wisconsin.

Sample ID	GP-18 (8-10')	GP-19 (6-8')	GP-23 (4-6')	GP-24 (0-2')	GP-24 (6-8')	GP-25 (6-8')	GP-26 (6-8')	GP-27 (8-10')	GP-28 (0-2')	GP-28 (4-6')
Sample Date	11/22/00	11/22/00	01/14/02	01/14/02	01/14/02	01/14/02	01/14/02	01/14/02	01/14/02	01/14/02
DRO (mg/kg)	<1.1	3.990	NA	NA	<4.6	<5.2	2.900	<4.5	NA	<4.6
GRO (mg/kg)	<0.65	<0.65	NA	NA	<3.3	<3.4	<2.9	<2.8	NA	<3
<b>VOCs (µg/kg)</b>										
Benzene	<12	<12	<25	NA	<25	<25	<25	<25	NA	<25
cis-1,2-Dichloroethene	<12	<12	<25	NA	NA	NA	NA	NA	NA	NA
Ethylbenzene	<12	<12	<25	NA	<25	<25	<25	<25	NA	<25
Isopropylbenzene	<15	<15	<25	NA	NA	NA	NA	NA	NA	NA
Methylene Chloride	<51	<51	<25	NA	NA	NA	NA	NA	NA	NA
Naphthalene	<35	110 Q	<25	NA	NA	NA	NA	NA	NA	NA
n-Propylbenzene	<23	<23	<25	NA	NA	NA	NA	NA	NA	NA
p-Isopropyltoluene	<33	<33	<25	NA	NA	NA	NA	NA	NA	NA
sec-Butylbenzene	<22	<22	NA	NA	NA	NA	NA	NA	NA	NA
Toluene	<7.1	20 Q	<25	NA	<25	<25	<25	<25	NA	<25
1,2,4-Trimethylbenzene	<30	32 Q	<25	NA	<25	<25	<25	<25	NA	<25
1,3,5-Trimethylbenzene	<22	<22	<25	NA	<25	<25	<25	<25	NA	<25
Xylene, -o	NA	NA	<25	NA	<25	<25	<25	<25	NA	<25
Xylenes, -m, -p	NA	NA	<25	NA	<25	<25	<25	<25	NA	<25
Xylenes, Total	<25	27 Q	NA	NA	NA	NA	NA	NA	NA	NA
<b>PAHs (µg/kg)</b>										
Acenaphthene	NA	NA	<180	NA	<22	<22	<19	<19	NA	<20
Acenaphthylene	NA	NA	<160	NA	<17	<17	<14	<14	NA	<15
Anthracene	NA	NA	<140	NA	17 Q	<16	<14	<13	NA	<14
Benzo (a) anthracene	NA	NA	<190	NA	27 Q	<18	200	<15	NA	<16
Benzo (a) pyrene	NA	NA	<160	NA	23 Q	<17	100	<14	NA	<15
Benzo (b) fluoranthene	NA	NA	<250	NA	19 Q	<15	<13	<12	NA	<13
Benzo (g,h,i) perylene	NA	NA	<160	NA	16 Q	<15	<13	<13	NA	<14
Benzo (k) fluoranthene	NA	NA	<210	NA	22 Q	<17	15 Q	<15	NA	<16
Chrysene	NA	NA	<220	NA	25 Q	<18	230	<15	NA	<16
Dibenzo (a,h) anthracene	NA	NA	<130	NA	<15	<15	27 Q	<12	NA	<13
Fluoranthene	NA	NA	<240	NA	50	<14	17 Q	<12	NA	<13
Fluorene	NA	NA	<210	NA	17 Q	<17	<14	<14	NA	<15
Indeno (1,2,3-cd) pyrene	NA	NA	<160	NA	15 Q	<15	<13	<13	NA	<14
1-Methylnaphthalene	NA	NA	NA	NA	<19	<19	<16	<16	NA	<17

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Table 2. Comparison of Site-Wide Soil Analytical Results to Generic Soil Cleanup Standards, Former Meritor Facility, Oshkosh, Wisconsin.

Sample ID	GP-18 (8-10')	GP-19 (6-8')	GP-23 (4-6')	GP-24 (0-2')	GP-24 (6-8')	GP-25 (6-8')	GP-26 (6-8')	GP-27 (8-10')	GP-28 (0-2')	GP-28 (4-6')
Sample Date	11/22/00	11/22/00	01/14/02	01/14/02	01/14/02	01/14/02	01/14/02	01/14/02	01/14/02	01/14/02
<b>PAHs (µg/kg) (continued)</b>										
2-Methylnaphthalene	NA	NA	<170	NA	<16	<16	<14	<13	NA	<14
Naphthalene	NA	NA	<180	NA	<23	<23	<20	<19	NA	<21
Phenanthrene	NA	NA	<140	NA	43 Q	<15	<13	<12	NA	<13
Pyrene	NA	NA	<240	NA	50 Q	<16	120	<13	NA	<14
<b>Metals (mg/kg)</b>										
Antimony	NA	NA	0.59 Q	NA	NA	NA	NA	NA	NA	NA
Arsenic	NA	NA	<b>3.4</b>	<b>3.8</b>	NA	NA	NA	NA	<b>3.9</b>	NA
Barium	NA	NA	NA	110	NA	NA	NA	NA	150	NA
Beryllium	NA	NA	1.2	NA	NA	NA	NA	NA	NA	NA
Cadmium	NA	NA	0.88	0.27	NA	NA	NA	NA	0.2	NA
Chromium, trivalent	NA	NA	37	36	NA	NA	NA	NA	40	NA
Copper	NA	NA	37	NA	NA	NA	NA	NA	NA	NA
Lead	13	9.9	28	<b>60</b>	NA	NA	NA	NA	17	NA
Mercury	NA	NA	0.042	<0.0062	NA	NA	NA	NA	0.046	NA
Nickel	NA	NA	26	NA	NA	NA	NA	NA	NA	NA
Selenium	NA	NA	1.1 Q	0.26 Q	NA	NA	NA	NA	0.26 Q	NA
Silver	NA	NA	<0.17	<0.096	NA	NA	NA	NA	<0.098	NA
Zinc	NA	NA	120	NA	NA	NA	NA	NA	NA	NA

- Generic regulatory criteria not established.
- Underline Value exceeds NR 720 residual contaminant levels (RCLs) for protection of groundwater.
- Bold** Value exceeds the generic NR 720 industrial direct contact RCLs.
- Box** Value exceeds the generic NR 720 industrial direct contact RCLs.
- DRO Diesel Range Organics.
- GRO Gasoline Range Organics.
- GW Pathway WDNR NR720 RCLs for protection of groundwater or NR 746 residual product (whichever is lesser).
- µg/kg Micrograms per kilogram.
- mg/kg Milligrams per kilogram.
- NA Not analyzed.
- NR720 IND DC WDNR NR720 Generic Industrial Direct Contact RCLs.
- NR720 NON-IND DC WDNR NR720 Generic Non-Industrial Direct Contact RCLs.
- PAHs Polycyclic Aromatic Hydrocarbons.
- Q Sample concentration is less than the practical quantitation limit.
- QU Unquantitated hydrocarbons present outside the reported carbon range.
- RL1 or L1 Report limit raised due to sample matrix effects.
- VOCs Volatile Organic Compounds.

Table 2. Comparison of Site-Wide Soil Analytical Results to Generic Soil Cleanup Standards, Former Meritor Facility, Oshkosh, Wisconsin.

Sample ID	GP-29 (0-2')	GP-29 (2-4')	GP-32 (0-2')	GP-32 (2-4')	GP-33 (0-2')	GP-33 (2-4')	GP-34 (0-2')	GP-34 (6-8')	GP-35 (8-10')	GP-36 (0-2')
Sample Date	01/14/02	01/14/02	01/15/02	01/15/02	01/15/02	01/15/02	01/15/02	01/15/02	01/15/02	01/15/02
DRO (mg/kg)	NA	1,300	NA	3,200	NA	1,500	NA	82	1,900	NA
GRO (mg/kg)	NA	<2.9	NA	7.9	NA	5.3	NA	NA	<3.5	NA
<b>VOCs (µg/kg)</b>										
Benzene	NA	<25	NA	<25	NA	<25	NA	NA	<25	NA
cis-1,2-Dichloroethene	NA	NA								
Ethylbenzene	NA	<25	NA	<25	NA	<25	NA	NA	<25	NA
Isopropylbenzene	NA	NA								
Methylene Chloride	NA	NA								
Naphthalene	NA	NA								
n-Propylbenzene	NA	NA								
p-Isopropyltoluene	NA	NA								
sec-Butylbenzene	NA	NA								
Toluene	NA	<25	NA	<25	NA	<25	NA	NA	NA	NA
1,2,4-Trimethylbenzene	NA	<25	NA	170	NA	57 Q	NA	NA	<25	NA
1,3,5-Trimethylbenzene	NA	<25	NA	150	NA	51 Q	NA	NA	<25	NA
Xylene, -o	NA	<25	NA	31 Q	NA	<25	NA	NA	<25	NA
Xylenes, -m, -p	NA	<25	NA	34 Q	NA	29 Q	NA	NA	<25	NA
Xylenes, Total	NA	NA								
<b>PAHs (µg/kg)</b>										
Acenaphthene	NA	<19	NA	<19	NA	<18	NA	<30	35 Q	NA
Acenaphthylene	NA	18 Q	NA	19 Q	NA	<13	NA	<23	47 Q	NA
Anthracene	NA	<14	NA	24 Q	NA	25 Q	NA	26 Q	110	NA
Benzo (a) anthracene	NA	25 Q	NA	120	NA	38 Q	NA	110	220	NA
Benzo (a) pyrene	NA	<14	NA	120	NA	50	NA	130	170	NA
Benzo (b) fluoranthene	NA	<13	NA	99	NA	35 Q	NA	110	200	NA
Benzo (g,h,i) perylene	NA	<13	NA	88	NA	21 Q	NA	70	100	NA
Benzo (k) fluoranthene	NA	<15	NA	120	NA	31 Q	NA	110	220	NA
Chrysene	NA	56	NA	260	NA	120	NA	120	230	NA
Dibenzo (a,h) anthracene	NA	<13	NA	40 Q	NA	<12	NA	21 Q	38 Q	NA
Fluoranthene	NA	<12	NA	170	NA	76	NA	250	560	NA
Fluorene	NA	<14	NA	31 Q	NA	17 Q	NA	<23	87	NA
Indeno (1,2,3-cd) pyrene	NA	<13	NA	82	NA	20 Q	NA	82	130	NA
1-Methylnaphthalene	NA	<16	NA	84	NA	46 Q	NA	<26	42 Q	NA

Footnotes on Page 8.

Table 2. Comparison of Site-Wide Soil Analytical Results to Generic Soil Cleanup Standards, Former Meritor Facility, Oshkosh, Wisconsin.

Sample ID	GP-29 (0-2')	GP-29 (2-4')	GP-32 (0-2')	GP-32 (2-4')	GP-33 (0-2')	GP-33 (2-4')	GP-34 (0-2')	GP-34 (6-8')	GP-35 (8-10')	GP-36 (0-2')
Sample Date	01/14/02	01/14/02	01/15/02	01/15/02	01/15/02	01/15/02	01/15/02	01/15/02	01/15/02	01/15/02
<b>PAHs (µg/kg) (continued)</b>										
2-Methylnaphthalene	NA	<14	NA	120	NA	67	NA	<22	58	NA
Naphthalene	NA	<20	NA	180	NA	35 Q	NA	<31	<24	NA
Phenanthrene	NA	<13	NA	250	NA	140	NA	190	630	NA
Pyrene	NA	170	NA	260	NA	150	NA	230	590	NA
<b>Metals (mg/kg)</b>										
Antimony	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Arsenic	<b>4.7</b>	NA	<b>0.49 Q</b>	NA	<b>0.53 Q</b>	NA	<b>2.2</b>	NA	<b>4.9</b>	<b>5</b>
Barium	170	NA	16	NA	30	NA	<u>520</u>	NA	210	<b>1,800</b>
Beryllium	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Cadmium	0.26	NA	0.12 Q	NA	<0.054	NA	0.099 Q	NA	0.57	0.22
Chromium, trivalent	43	NA	3.7	NA	4	NA	32	NA	49	66
Copper	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Lead	25	NA	1.9	NA	1.4	NA	19	NA	23	<b>77</b>
Mercury	0.03	NA	<0.0056	NA	0.021	NA	0.23	NA	0.059	0.19
Nickel	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Selenium	0.52 Q	NA	<0.22	NA	<0.22	NA	<0.23	NA	0.36 Q	0.53 Q
Silver	<0.1	NA	0.3	NA	<0.086	NA	0.10 Q	NA	<0.11	0.20 Q
Zinc	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

- Generic regulatory criteria not established.
- Underline Value exceeds NR 720 residual contaminant levels (RCLs) for protection of groundwater.
- Bold** Value exceeds the generic NR 720 industrial direct contact RCLs.
- Box** Value exceeds the generic NR 720 industrial direct contact RCLs.
- DRO Diesel Range Organics.
- GRO Gasoline Range Organics.
- GW Pathway WDNR NR720 RCLs for protection of groundwater or NR 746 residual product (whichever is lesser).
- µg/kg Micrograms per kilogram.
- mg/kg Milligrams per kilogram.
- NA Not analyzed.
- NR720 IND DC WDNR NR720 Generic Industrial Direct Contact RCLs.
- NR720 NON-IND DC WDNR NR720 Generic Non-Industrial Direct Contact RCLs.
- PAHs Polycyclic Aromatic Hydrocarbons.
- Q Sample concentration is less than the practical quantitation limit.
- QU Unquantitated hydrocarbons present outside the reported carbon range.
- RL1 or L1 Report limit raised due to sample matrix effects.
- VOCs Volatile Organic Compounds.

Table 2. Comparison of Site-Wide Soil Analytical Results to Generic Soil Cleanup Standards, Former Meritor Facility, Oshkosh, Wisconsin.

Sample ID	GP-36 (6-8')	GP-37 (0-2')	GP-37 (6-8')	GP-38 (8-10')	GP-39 (6-8')	GP-40 (6-8')	GP-41 (0-2')	GP-41 (8-10')	GP-42 (0-2')	GP-42 (6-8')
Sample Date	01/15/02	01/15/02	01/15/02	01/15/02	01/15/02	01/16/02	01/16/02	01/16/02	01/16/02	01/16/02
DRO (mg/kg)	49	NA	340	1,200	NA	450	NA	6.4	NA	340
GRO (mg/kg)	NA	NA	NA	<3.1	NA	3.5	NA	<3.9	NA	11
<b>VOCs (µg/kg)</b>										
Benzene	NA	NA	NA	<25	<25	<25	NA	<25	NA	<25
cis-1,2-Dichloroethene	NA	NA	NA	NA	<25	NA	NA	NA	NA	NA
Ethylbenzene	NA	NA	NA	<25	<25	<25	NA	<25	NA	120
Isopropylbenzene	NA	NA	NA	NA	<25	NA	NA	NA	NA	NA
Methylene Chloride	NA	NA	NA	NA	<25	NA	NA	NA	NA	NA
Naphthalene	NA	NA	NA	NA	<25	NA	NA	NA	NA	NA
n-Propylbenzene	NA	NA	NA	NA	<25	NA	NA	NA	NA	NA
p-Isopropyltoluene	NA	NA	NA	NA	<25	NA	NA	NA	NA	NA
sec-Butylbenzene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Toluene	NA	NA	NA	<25	<25	<25	NA	<25	NA	<25
1,2,4-Trimethylbenzene	NA	NA	NA	<25	<25	<25	NA	<25	NA	99 Q
1,3,5-Trimethylbenzene	NA	NA	NA	<25	<25	<25	NA	<25	NA	76 Q
Xylene, -o	NA	NA	NA	<25	<25	<25	NA	<25	NA	87 Q
Xylenes, -m, -p	NA	NA	NA	<25	<25	<25	NA	<25	NA	240
Xylenes, Total	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
<b>PAHs (µg/kg)</b>										
Acenaphthene	<83	NA	520	23 Q	<53	<19	NA	<26	NA	13,000
Acenaphthylene	<63	NA	240 Q	<16	48 Q	<15	NA	<19	NA	2,200 Q
Anthracene	<61	NA	530	26 Q	100 Q	<14	NA	25 Q	NA	22,000
Benzo (a) anthracene	200 Q	NA	2,500	26 Q	260	<16	NA	<21	NA	27,000
Benzo (a) pyrene	240	NA	2,600	24 Q	290	<15	NA	<19	NA	28,000
Benzo (b) fluoranthene	240	NA	2,200	43 Q	240	<13	NA	<17	NA	21,000
Benzo (g,h,i) perylene	150 Q	NA	1,200	25 Q	150	<13	NA	<18	NA	14,000
Benzo (k) fluoranthene	190 Q	NA	2,200	36 Q	230	<15	NA	<20	NA	20,000
Chrysene	230	NA	2,500	60	540 Q	40 Q	NA	<21	NA	24,000
Dibenzo (a,h) anthracene	<56	NA	380	19 Q	<190	<13	NA	<17	NA	5,000
Fluoranthene	470	NA	5,500	50	630	<12	NA	<16	NA	74,000
Fluorene	<63	NA	280	50 Q	<40	<15	NA	<19	NA	15,000
Indeno (1,2,3-cd) pyrene	170 Q	NA	1,300	24 Q	320 Q	<13	NA	<18	NA	15,000
1-Methylnaphthalene	<71	NA	130 Q	43 Q	65 Q	<16	NA	<22	NA	3,500 Q

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Table 2. Comparison of Site-Wide Soil Analytical Results to Generic Soil Cleanup Standards, Former Meritor Facility, Oshkosh, Wisconsin.

Sample ID	GP-36 (6-8')	GP-37 (0-2')	GP-37 (6-8')	GP-38 (8-10')	GP-39 (6-8')	GP-40 (6-8')	GP-41 (0-2')	GP-41 (8-10')	GP-42 (0-2')	GP-42 (6-8')
Sample Date	01/15/02	01/15/02	01/15/02	01/15/02	01/15/02	01/16/02	01/16/02	01/16/02	01/16/02	01/16/02
<b>PAHs (µg/kg) (continued)</b>										
2-Methylnaphthalene	<61	NA	150 Q	62	77 Q	<14	NA	<19	NA	5,400
Naphthalene	<86	NA	290 Q	<21	110 Q	<20	NA	<26	NA	9,800
Phenanthrene	360	NA	<u>3,900</u>	230	490	<13	NA	<17	NA	<b>89,000</b>
Pyrene	440	NA	4,700	150	570	18 Q	NA	21 Q	NA	54,000
<b>Metals (mg/kg)</b>										
Antimony	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Arsenic	NA	<b>0.52 Q</b>	NA	<b>3.6</b>	NA	NA	<b>4.9</b>	NA	<b>2.2</b>	NA
Barium	NA	47	NA	200	NA	NA	14	NA	22	NA
Beryllium	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Cadmium	NA	<0.055	NA	0.23	NA	NA	0.091 Q	NA	0.089 Q	NA
Chromium, trivalent	NA	3.4	NA	44	NA	NA	15	NA	7.3	NA
Copper	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Lead	NA	1.2	NA	13	NA	NA	14	NA	7.2	NA
Mercury	NA	<0.0057	NA	0.019 Q	NA	NA	0.0067 Q	NA	<0.0054	NA
Nickel	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Selenium	NA	<0.22	NA	0.29 Q	NA	NA	0.34 Q	NA	0.34 Q	NA
Silver	NA	<0.088	NA	<0.1	NA	NA	<0.081	NA	<0.084	NA
Zinc	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

- Generic regulatory criteria not established.
- Underline Value exceeds NR 720 residual contaminant levels (RCLs) for protection of groundwater.
- Bold** Value exceeds the generic NR 720 industrial direct contact RCLs.
- Box** Value exceeds the generic NR 720 industrial direct contact RCLs.
- DRO Diesel Range Organics.
- GRO Gasoline Range Organics.
- GW Pathway WDNR NR720 RCLs for protection of groundwater or NR 746 residual product (whichever is lesser).
- µg/kg Micrograms per kilogram.
- mg/kg Milligrams per kilogram.
- NA Not analyzed.
- NR720 IND DC WDNR NR720 Generic Industrial Direct Contact RCLs.
- NR720 NON-IND DC WDNR NR720 Generic Non-Industrial Direct Contact RCLs.
- PAHs Polycyclic Aromatic Hydrocarbons.
- Q Sample concentration is less than the practical quantitation limit.
- QU Unquantitated hydrocarbons present outside the reported carbon range.
- RL1 or L1 Report limit raised due to sample matrix effects.
- VOCs Volatile Organic Compounds.

Table 2. Comparison of Site-Wide Soil Analytical Results to Generic Soil Cleanup Standards, Former Meritor Facility, Oshkosh, Wisconsin.

Sample ID	GP-43 (6-8')	GP-44 (0-4')	GP-45 (2-4')	GP-45 (6-8')	GP-46 (0-2')	GP-46 (2-4')	GP-47 (4-6')	GP-47 (6-8')	GP-48 (2-4')	GP-48 (4-6')
Sample Date	01/16/02	01/16/02	04/19/06	04/19/06	04/18/06	04/18/06	04/20/06	04/20/06	04/18/06	04/18/06
DRO (mg/kg)	3,000	3.9	NA	3,300	NA	NA	NA	NA	NA	11,000
GRO (mg/kg)	<5.2	<2.7	NA							
<b>VOCs (µg/kg)</b>										
Benzene	<25	<25	NA	<43	NA	<27	NA	<34	NA	<32
cis-1,2-Dichloroethene	NA									
Ethylbenzene	<25	<25	NA	<43	NA	<27	NA	<34	NA	<32
Isopropylbenzene	NA									
Methylene Chloride	NA									
Naphthalene	NA									
n-Propylbenzene	NA									
p-Isopropyltoluene	NA									
sec-Butylbenzene	NA									
Toluene	<25	<25	NA	<43	NA	<27	NA	<34	NA	<32
1,2,4-Trimethylbenzene	<25	<25	NA	<43	NA	<27	NA	<34	NA	<32
1,3,5-Trimethylbenzene	<25	<25	NA	<43	NA	<27	NA	<34	NA	<32
Xylene, -o	<25	<25	NA							
Xylenes, -m, -p	<25	<25	NA							
Xylenes, Total	NA	NA	NA	<130	NA	<80	NA	<100	NA	<96
<b>PAHs (µg/kg)</b>										
Acenaphthene	46 Q	<18	NA	<220	NA	<53	NA	<170	NA	<960
Acenaphthylene	48 Q	<13	NA	<370	NA	<90	NA	<290	NA	<1,600
Anthracene	240	<13	NA	<22	NA	<5.3	NA	43	NA	300
Benzo (a) anthracene	290	<15	NA	<22	NA	17	NA	130	NA	2,000
Benzo (a) pyrene	540	<13	NA	<22	NA	26	NA	<17	NA	420
Benzo (b) fluoranthene	370	<12	NA	<22	NA	16	NA	49	NA	380
Benzo (g,h,i) perylene	210	<12	NA	<22	NA	16	NA	<17	NA	300
Benzo (k) fluoranthene	380	<14	NA	<22	NA	21	NA	<17	NA	110
Chrysene	510	<15	NA	<22	NA	14	NA	93	NA	660
Dibenzo (a,h) anthracene	140	13 Q	NA	<32	NA	<8.0	NA	<26	NA	<140
Fluoranthene	920	<11	NA	<43	NA	32	NA	860	NA	3,100
Fluorene	110	<13	NA	<43	NA	<11	NA	51	NA	250
Indeno (1,2,3-cd) pyrene	260	14 Q	NA	<22	NA	16	NA	<17	NA	210
1-Methylnaphthalene	75 Q	<15	NA	<130	NA	<32	NA	<100	NA	<580

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Table 2. Comparison of Site-Wide Soil Analytical Results to Generic Soil Cleanup Standards, Former Meritor Facility, Oshkosh, Wisconsin.

Sample ID	GP-43 (6-8')	GP-44 (0-4')	GP-45 (2-4')	GP-45 (6-8')	GP-46 (0-2')	GP-46 (2-4')	GP-47 (4-6')	GP-47 (6-8')	GP-48 (2-4')	GP-48 (4-6')
Sample Date	01/16/02	01/16/02	04/19/06	04/19/06	04/18/06	04/18/06	04/20/06	04/20/06	04/18/06	04/18/06
<b>PAHs (µg/kg) (continued)</b>										
2-Methylnaphthalene	92	<13	NA	<110	NA	<27	NA	<86	NA	980
Naphthalene	58 Q	<18	NA	<130	NA	<32	NA	<100	NA	<580
Phenanthrene	520	<12	NA	<22	NA	18	NA	250	NA	1,300
Pyrene	1,000	<13	NA	<22	NA	26	NA	81	NA	450
<b>Metals (mg/kg)</b>										
Antimony	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Arsenic	<b>7.4</b>	<b>1.9</b>	<b>8.6</b>	<b>&lt;3.8</b>	<b>3.4</b>	<b>4.2</b>	<b>8.9</b>	<b>3.1</b>	<b>7.6</b>	<b>7.8</b>
Barium	140	16	290	89	13 B	63 B	260	150	<b>1300</b>	<b>590</b>
Beryllium	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Cadmium	0.53	0.070 Q	NA	NA	NA	NA	NA	NA	NA	NA
Chromium, trivalent	29	7.5	12	20	4.3	6.1	21	28	19	14
Copper	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Lead	<b>130</b>	4.3	<b>140</b>	32	6.8	19	<b>230</b>	18	<b>88</b>	<b>520</b>
Mercury	0.16	<0.0056	NA	NA	NA	NA	NA	NA	NA	NA
Nickel	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Selenium	1.0 Q	<0.22	NA	NA	NA	NA	NA	NA	NA	NA
Silver	0.37 Q	<0.087	NA	NA	NA	NA	NA	NA	NA	NA
Zinc	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

- Generic regulatory criteria not established.
- Underline Value exceeds NR 720 residual contaminant levels (RCLs) for protection of groundwater.
- Bold** Value exceeds the generic NR 720 industrial direct contact RCLs.
- Box** Value exceeds the generic NR 720 industrial direct contact RCLs.
- DRO Diesel Range Organics.
- GRO Gasoline Range Organics.
- GW Pathway WDNR NR720 RCLs for protection of groundwater or NR 746 residual product (whichever is lesser).
- µg/kg Micrograms per kilogram.
- mg/kg Milligrams per kilogram.
- NA Not analyzed.
- NR720 IND DC WDNR NR720 Generic Industrial Direct Contact RCLs.
- NR720 NON-IND DC WDNR NR720 Generic Non-Industrial Direct Contact RCLs.
- PAHs Polycyclic Aromatic Hydrocarbons.
- Q Sample concentration is less than the practical quantitation limit.
- QU Unquantitated hydrocarbons present outside the reported carbon range.
- RL1 or L1 Report limit raised due to sample matrix effects.
- VOCs Volatile Organic Compounds.

Table 2. Comparison of Site-Wide Soil Analytical Results to Generic Soil Cleanup Standards, Former Meritor Facility, Oshkosh, Wisconsin.

Sample ID	GP-49 (0-2')	GP-49 (4-6')	GP-50 (0-2')	GP-50 (4-6')	GP-51 (0-2')	GP-51 (2-4')	GP-52 (0-2')	GP-52 (2-4')	GP-53 (0-2')	GP-53 (2-4')
Sample Date	04/19/06	04/19/06	04/18/06	04/18/06	04/18/06	04/18/06	04/18/06	04/18/06	04/18/06	04/18/06
DRO (mg/kg)	NA	3,300	NA	6,300						
GRO (mg/kg)	NA									
<b>VOCs (µg/kg)</b>										
Benzene	NA	<36	NA	<28 QU						
cis-1,2-Dichloroethene	NA									
Ethylbenzene	NA	<36	NA	<660 QU,RL1						
Isopropylbenzene	NA									
Methylene Chloride	NA									
Naphthalene	NA									
n-Propylbenzene	NA									
p-Isopropyltoluene	NA									
sec-Butylbenzene	NA									
Toluene	NA	<36	NA	38 QU						
1,2,4-Trimethylbenzene	NA	43	NA	400 QU						
1,3,5-Trimethylbenzene	NA	<36	NA	<28 QU						
Xylene, -o	NA									
Xylenes, -m, -p	NA									
Xylenes, Total	NA	<110	NA	300 QU						
<b>PAHs (µg/kg)</b>										
Acenaphthene	NA	<360	<2,200	<70	<2,200	<350	<990	<1,700	NA	690
Acenaphthylene	NA	<620	<3,700	<120	<3,700	<590	<1,700	<2,900	NA	<950
Anthracene	NA	310	<220	26	260	380	<99	380	NA	1,400
Benzo (a) anthracene	NA	1,200	600	49	1,000	950	870	1,100	NA	4,300
Benzo (a) pyrene	NA	650	550	43	1,100	930	<99	1,000	NA	110
Benzo (b) fluoranthene	NA	490	<220	30	370	580	<99	850	NA	150
Benzo (g,h,i) perylene	NA	420	620	29	580	590	<99	830	NA	100
Benzo (k) fluoranthene	NA	290	300	18	380	440	<99	530	NA	97
Chrysene	NA	400	270	36	620	790	260	940	NA	1,400
Dibenzo (a,h) anthracene	NA	110	<330	<11	<320	96	<150	<260	NA	<84
Fluoranthene	NA	2,600	1,200	130	2,200	2700	410	2,600	NA	7,100
Fluorene	NA	190	<430	<14	<430	140	<200	<340	NA	2,100
Indeno (1,2,3-cd) pyrene	NA	420	260	30	560	580	<99	770	NA	68
1-Methylnaphthalene	NA	230	<1,300	<42	<1,300	<210	<600	<1,000	NA	9,900

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Table 2. Comparison of Site-Wide Soil Analytical Results to Generic Soil Cleanup Standards, Former Meritor Facility, Oshkosh, Wisconsin.

Sample ID	GP-49 (0-2')	GP-49 (4-6')	GP-50 (0-2')	GP-50 (4-6')	GP-51 (0-2')	GP-51 (2-4')	GP-52 (0-2')	GP-52 (2-4')	GP-53 (0-2')	GP-53 (2-4')
Sample Date	04/19/06	04/19/06	04/18/06	04/18/06	04/18/06	04/18/06	04/18/06	04/18/06	04/18/06	04/18/06
<b>PAHs (µg/kg) (continued)</b>										
2-Methylnaphthalene	NA	760	<1,100	<35	<1,100	830	<500	1,400	NA	13,000
Naphthalene	NA	310	<1,300	<42	<1,300	<210	<600	<1,000	NA	<u>2,500</u>
Phenanthrene	NA	1,100	670	87	970	1,400	190	1,700	NA	<u>5,300</u>
Pyrene	NA	500	350	49	1,300	1,700	1,000	1,600	NA	4,000
<b>Metals (mg/kg)</b>										
Antimony	NA									
Arsenic	<b>7.3</b>	<b>4.7</b>	<b>13</b>	<b>5.3</b>	<b>7.2</b>	<b>15</b>	<b>20</b>	<b>4.9</b>	<b>5.5</b>	<b>4.2</b>
Barium	8.6	<b>380</b>	<b>330 B</b>	80 B	30 B	<b>400 B</b>	<b>500 B</b>	250 B	110 B	140 B
Beryllium	NA									
Cadmium	NA									
Chromium, trivalent	6.6	11	9.8	11	4.1	16	250	12	9.7	11
Copper	NA									
Lead	15	<b>250</b>	<b>1,000</b>	<b>340</b>	<b>190</b>	<b>1,700</b>	<b>1,000</b>	<b>240</b>	38	32
Mercury	NA									
Nickel	NA									
Selenium	NA									
Silver	NA									
Zinc	NA									

- Generic regulatory criteria not established.
- Underline Value exceeds NR 720 residual contaminant levels (RCLs) for protection of groundwater.
- Bold** Value exceeds the generic NR 720 industrial direct contact RCLs.
- Box** Value exceeds the generic NR 720 industrial direct contact RCLs.
- DRO Diesel Range Organics.
- GRO Gasoline Range Organics.
- GW Pathway WDNR NR720 RCLs for protection of groundwater or NR 746 residual product (whichever is lesser).
- µg/kg Micrograms per kilogram.
- mg/kg Milligrams per kilogram.
- NA Not analyzed.
- NR720 IND DC WDNR NR720 Generic Industrial Direct Contact RCLs.
- NR720 NON-IND DC WDNR NR720 Generic Non-Industrial Direct Contact RCLs.
- PAHs Polycyclic Aromatic Hydrocarbons.
- Q Sample concentration is less than the practical quantitation limit.
- QU Unquantitated hydrocarbons present outside the reported carbon range.
- RL1 or L1 Report limit raised due to sample matrix effects.
- VOCs Volatile Organic Compounds.

Table 2. Comparison of Site-Wide Soil Analytical Results to Generic Soil Cleanup Standards, Former Meritor Facility, Oshkosh, Wisconsin.

Sample ID	GP-54 (0-2')	GP-54 (2-4')	GP-56 (4-6')	GP-56 (6-8')	GP-57 (0-2')	GP-58 (2-4')	GP-58 (4-6')	GP-59 (2-4')	GP-59 (4-5')	GP-60 (0-2')
Sample Date	04/18/06	04/18/06	04/20/06	04/20/06	04/20/06	04/20/06	04/20/06	04/20/06	04/20/06	04/20/06
DRO (mg/kg)	NA	17,000	NA	2,100						
GRO (mg/kg)	NA									
<b>VOCs (µg/kg)</b>										
Benzene	NA	<500 QU	NA	<34	<31	NA	<34	<27 QU	NA	<31 QU
cis-1,2-Dichloroethene	NA									
Ethylbenzene	NA	<500 QU	NA	350	<31	NA	42	140 QU	NA	<160 QU,RL1
Isopropylbenzene	NA									
Methylene Chloride	NA									
Naphthalene	NA	5,900 QU	NA	<3,200 QU,RL1						
n-Propylbenzene	NA									
p-Isopropyltoluene	NA									
sec-Butylbenzene	NA									
Toluene	NA	<500 QU	NA	<34	<31	NA	<34	<27 QU	NA	<31 QU
1,2,4-Trimethylbenzene	NA	1,200 QU	NA	2,000	37	NA	59	320 QU	NA	260 QU
1,3,5-Trimethylbenzene	NA	700 QU	NA	490	<31	NA	<34	51 QU	NA	110 QU
Xylene, -o	NA									
Xylenes, -m, -p	NA									
Xylenes, Total	NA	<1,500 QU	NA	270	<92	NA	<100	180 QU	NA	<93 QU
<b>PAHs (µg/kg)</b>										
Acenaphthene	NA	NA	NA	350	<150	NA	<170	<130	NA	NA
Acenaphthylene	NA	NA	NA	<290	<260	NA	<290	<230	NA	NA
Anthracene	NA	NA	NA	400	90	NA	<17	48	NA	NA
Benzo (a) anthracene	NA	NA	NA	440	1,400	NA	200	<13	NA	NA
Benzo (a) pyrene	NA	NA	NA	<17	120	NA	44	<13	NA	NA
Benzo (b) fluoranthene	NA	NA	NA	<17	<15	NA	52	<13	NA	NA
Benzo (g,h,i) perylene	NA	NA	NA	<17	<15	NA	52	<13	NA	NA
Benzo (k) fluoranthene	NA	NA	NA	<17	86	NA	<17	<13	NA	NA
Chrysene	NA	NA	NA	<17	140	NA	31	<13	NA	NA
Dibenzo (a,h) anthracene	NA	NA	NA	<26	<23	NA	<26	<20	NA	NA
Fluoranthene	NA	NA	NA	3,500	400	NA	140	260	NA	NA
Fluorene	NA	NA	NA	480	<31	NA	<34	<27	NA	NA
Indeno (1,2,3-cd) pyrene	NA	NA	NA	<17	<15	NA	51	<13	NA	NA
1-Methylnaphthalene	NA	NA	NA	410	<92	NA	<100	<81	NA	NA

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Table 2. Comparison of Site-Wide Soil Analytical Results to Generic Soil Cleanup Standards, Former Meritor Facility, Oshkosh, Wisconsin.

Sample ID	GP-54 (0-2')	GP-54 (2-4')	GP-56 (4-6')	GP-56 (6-8')	GP-57 (0-2')	GP-58 (2-4')	GP-58 (4-6')	GP-59 (2-4')	GP-59 (4-5')	GP-60 (0-2')
Sample Date	04/18/06	04/18/06	04/20/06	04/20/06	04/20/06	04/20/06	04/20/06	04/20/06	04/20/06	04/20/06
<b>PAHs (µg/kg) (continued)</b>										
2-Methylnaphthalene	NA	NA	NA	1,500	<76	NA	<86	<67	NA	NA
Naphthalene	NA	NA	NA	200	<92	NA	<100	<81	NA	NA
Phenanthrene	NA	NA	NA	1,800	180	NA	81	110	NA	NA
Pyrene	NA	NA	NA	470	200	NA	30	56	NA	NA
<b>Metals (mg/kg)</b>										
Antimony	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Arsenic	<b>5.1</b>	<b>31</b>	<b>7.2</b>	<b>14</b>	<b>&lt;2.7</b>	<b>2.5</b>	<b>4.3</b>	<b>15</b>	<b>4.3</b>	<b>4.7</b>
Barium	6.2 B	<u>2,300 B</u>	170	180	8.1	110	<u>2,000</u>	46	33	69
Beryllium	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Cadmium	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Chromium, trivalent	3.4	310	32	39	2.8	7.2	38	96	28	19
Copper	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Lead	13	<b>1,400</b>	9.9	8.3	8	9.9	45	<b>59</b>	24	7.2
Mercury	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Nickel	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Selenium	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Silver	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Zinc	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

- Generic regulatory criteria not established.
- Underline Value exceeds NR 720 residual contaminant levels (RCLs) for protection of groundwater.
- Bold** Value exceeds the generic NR 720 industrial direct contact RCLs.
- Box** Value exceeds the generic NR 720 industrial direct contact RCLs.
- DRO Diesel Range Organics.
- GRO Gasoline Range Organics.
- GW Pathway WDNR NR720 RCLs for protection of groundwater or NR 746 residual product (whichever is lesser).
- µg/kg Micrograms per kilogram.
- mg/kg Milligrams per kilogram.
- NA Not analyzed.
- NR720 IND DC WDNR NR720 Generic Industrial Direct Contact RCLs.
- NR720 NON-IND DC WDNR NR720 Generic Non-Industrial Direct Contact RCLs.
- PAHs Polycyclic Aromatic Hydrocarbons.
- Q Sample concentration is less than the practical quantitation limit.
- QU Unquantitated hydrocarbons present outside the reported carbon range.
- RL1 or L1 Report limit raised due to sample matrix effects.
- VOCs Volatile Organic Compounds.

Table 2. Comparison of Site-Wide Soil Analytical Results to Generic Soil Cleanup Standards, Former Meritor Facility, Oshkosh, Wisconsin.

Sample ID	GP-61 (4-6')	GP-62 (2-4')	GP-62 (4-6')	GP-63 (2-4')	GP-63 (4-6')	GP-64 (2-4')	GP-64 (8-10')	GP-65 (0-2')	GP-65 (4-6')	GP-66 (0-2')
Sample Date	04/20/06	04/21/06	04/21/06	04/19/06	04/19/06	04/19/06	04/19/06	04/20/06	04/20/06	04/18/06
DRO (mg/kg)	NA	NA	150	NA	15,000	NA	3,200	NA	910	NA
GRO (mg/kg)	NA	NA	NA	NA						
<b>VOCs (µg/kg)</b>										
Benzene	<29	200	<28	NA	<35 QU	NA	<32	NA	<34	NA
cis-1,2-Dichloroethene	NA	NA	NA	NA						
Ethylbenzene	<29	210	<28	NA	92 QU	NA	210	NA	<34	NA
Isopropylbenzene	NA	NA	NA	NA						
Methylene Chloride	NA	NA	NA	NA						
Naphthalene	NA	NA	NA	NA						
n-Propylbenzene	NA	NA	NA	NA						
p-Isopropyltoluene	NA	NA	NA	NA						
sec-Butylbenzene	NA	NA	NA	NA						
Toluene	<29	160	<28	NA	<35 QU	NA	<32	NA	<34	NA
1,2,4-Trimethylbenzene	<29	98	<28	NA	91 QU	NA	41	NA	83	NA
1,3,5-Trimethylbenzene	<29	<31	<28	NA	<35 QU	NA	<32	NA	<34	NA
Xylene, -o	NA	NA	NA	NA						
Xylenes, -m, -p	NA	NA	NA	NA						
Xylenes, Total	<88	360	<83	NA	110 QU	NA	<97	NA	<100	NA
<b>PAHs (µg/kg)</b>										
Acenaphthene	<59	<150	<140	<54	<1,200	<2,100	<65	<130	<170	100
Acenaphthylene	<100	<260	<230	<92	<2,100	<3,600	<110	<220	<290	<90
Anthracene	<5.9	36	29	<5.4	280	2,600	16	<13	<23	130
Benzo (a) anthracene	<5.9	140	150	<5.4	4,500	3,500	70	<13	<17	360
Benzo (a) pyrene	<5.9	120	160	<5.4	<120	1,800	16	<13	<17	340
Benzo (b) fluoranthene	<5.9	79	120	<5.4	1,400	1,300	12	<13	<17	330
Benzo (g,h,i) perylene	<5.9	89	120	<5.4	<120	830	<6.5	<13	<17	250
Benzo (k) fluoranthene	<5.9	56	84	<5.4	420	460	8.9	<13	<17	170
Chrysene	<5.9	110	140	<5.4	950	2,400	32	<13	<17	310
Dibenzo (a,h) anthracene	<8.8	<23	21	<8.1	<190	<320	<9.7	<20	<26	44
Fluoranthene	<12	330	360	<11	3,300	12,000	140	<26	280	870
Fluorene	<12	<31	<28	<11	530	3,000	23	<26	<34	49
Indeno (1,2,3-cd) pyrene	<5.9	80	120	<5.4	<120	660	6.7	<13	<17	260
1-Methylnaphthalene	<35	<93	<83	<33	<740	2,100	<39	<79	<100	60

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Table 2. Comparison of Site-Wide Soil Analytical Results to Generic Soil Cleanup Standards, Former Meritor Facility, Oshkosh, Wisconsin.

Sample ID	GP-61 (4-6')	GP-62 (2-4')	GP-62 (4-6')	GP-63 (2-4')	GP-63 (4-6')	GP-64 (2-4')	GP-64 (8-10')	GP-65 (0-2')	GP-65 (4-6')	GP-66 (0-2')
Sample Date	04/20/06	04/21/06	04/21/06	04/19/06	04/19/06	04/19/06	04/19/06	04/20/06	04/20/06	04/18/06
<b>PAHs (µg/kg) (continued)</b>										
2-Methylnaphthalene	<29	<77	<69	<27	1,200	9,400	85	<66	<86	380
Naphthalene	<35	<93	<83	<33	<740	<u>2,100</u>	<39	<79	<100	<32
Phenanthrene	<5.9	260	150	<5.4	510	<u>13,000</u>	180	<13	75	540
Pyrene	<5.9	200	290	<5.4	1,100	5,600	35	<13	79	560
<b>Metals (mg/kg)</b>										
Antimony	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Arsenic	<b>4.7</b>	<b>10</b>	<b>6.1</b>	NA	<b>5</b>	NA	<b>6.2</b>	NA	NA	NA
Barium	66	160	73	NA	<u>1,000</u>	NA	190	NA	130	60
Beryllium	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Cadmium	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Chromium, trivalent	17	48	11	NA	22	NA	35	NA	18	25
Copper	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Lead	8	36	27	NA	<b>120</b>	NA	9.5	NA	9.2	19
Mercury	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Nickel	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Selenium	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Silver	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Zinc	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

- Generic regulatory criteria not established.
- Underline Value exceeds NR 720 residual contaminant levels (RCLs) for protection of groundwater.
- Bold** Value exceeds the generic NR 720 industrial direct contact RCLs.
- Box** Value exceeds the generic NR 720 industrial direct contact RCLs.
- DRO Diesel Range Organics.
- GRO Gasoline Range Organics.
- GW Pathway WDNR NR720 RCLs for protection of groundwater or NR 746 residual product (whichever is lesser).
- µg/kg Micrograms per kilogram.
- mg/kg Milligrams per kilogram.
- NA Not analyzed.
- NR720 IND DC WDNR NR720 Generic Industrial Direct Contact RCLs.
- NR720 NON-IND DC WDNR NR720 Generic Non-Industrial Direct Contact RCLs.
- PAHs Polycyclic Aromatic Hydrocarbons.
- Q Sample concentration is less than the practical quantitation limit.
- QU Unquantitated hydrocarbons present outside the reported carbon range.
- RL1 or L1 Report limit raised due to sample matrix effects.
- VOCs Volatile Organic Compounds.

Table 2. Comparison of Site-Wide Soil Analytical Results to Generic Soil Cleanup Standards, Former Meritor Facility, Oshkosh, Wisconsin.

Sample ID	GP-66 (4-6')	GP-67 (0-2')	GP-67 (4-6')	GP-68 (0-2')	GP-68 (4-6')	GP-69 (0-2')	GP-70 (0-2')	GP-71 (0-2')	GP-71 (4-6')	GP-72 (2-4')
Sample Date	04/18/06	04/18/06	04/18/06	04/18/06	04/18/06	04/20/06	04/20/06	04/18/06	04/18/06	04/19/06
DRO (mg/kg)	NA	NA	NA	NA	NA	690	2,500	NA	1,700	NA
GRO (mg/kg)	NA									
<b>VOCs (µg/kg)</b>										
Benzene	NA	NA	NA	NA	NA	<31	<27	NA	130	NA
cis-1,2-Dichloroethene	NA									
Ethylbenzene	NA	NA	NA	NA	NA	<31	<27	NA	<6,200 RL1	NA
Isopropylbenzene	NA									
Methylene Chloride	NA									
Naphthalene	NA									
n-Propylbenzene	NA									
p-Isopropyltoluene	NA									
sec-Butylbenzene	NA									
Toluene	NA	NA	NA	NA	NA	<31	39	NA	1,200	NA
1,2,4-Trimethylbenzene	NA	NA	NA	NA	NA	<31	45	NA	680	NA
1,3,5-Trimethylbenzene	NA	NA	NA	NA	NA	<31	<27	NA	<34	NA
Xylene, -o	NA									
Xylenes, -m, -p	NA									
Xylenes, Total	NA	NA	NA	NA	NA	<93	<80	NA	<1,400 RL1	NA
<b>PAHs (µg/kg)</b>										
Acenaphthene	<310	<550	<130	<790	<420	<150	<270	<53	<67	<140
Acenaphthylene	<520	<940	<230	<1,300	<720	<260	<450	<90	<110	<230
Anthracene	47	86	<13	98	120	<15	<27	<5.3	7.1	16
Benzo (a) anthracene	150	490	<13	540	360	60	<27	<5.3	340	56
Benzo (a) pyrene	96	480	<13	550	350	71	<27	<5.3	300	57
Benzo (b) fluoranthene	78	370	<13	450	300	61	<27	<5.3	190	43
Benzo (g,h,i) perylene	91	510	<13	590	270	54	<27	<5.3	200	47
Benzo (k) fluoranthene	46	230	<13	310	200	41	<27	<5.3	79	29
Chrysene	100	390	<13	410	280	65	<27	<5.3	200	47
Dibenzo (a,h) anthracene	<46	<83	<20	140	<63	<23	<40	<8.0	38	<20
Fluoranthene	390	910	<27	990	770	170	<53	<11	510	130
Fluorene	<61	<110	<27	<160	<85	<31	<53	<11	23	<27
Indeno (1,2,3-cd) pyrene	71	460	<13	560	290	66	<27	<5.3	190	46
1-Methylnaphthalene	240	<330	<80	<470	<250	<93	<160	<32	81	<82

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Table 2. Comparison of Site-Wide Soil Analytical Results to Generic Soil Cleanup Standards, Former Meritor Facility, Oshkosh, Wisconsin.

Sample ID	GP-66 (4-6')	GP-67 (0-2')	GP-67 (4-6')	GP-68 (0-2')	GP-68 (4-6')	GP-69 (0-2')	GP-70 (0-2')	GP-71 (0-2')	GP-71 (4-6')	GP-72 (2-4')
Sample Date	04/18/06	04/18/06	04/18/06	04/18/06	04/18/06	04/20/06	04/20/06	04/18/06	04/18/06	04/19/06
<b>PAHs (µg/kg) (continued)</b>										
2-Methylnaphthalene	550	780	<67	<390	490	<77	<130	<27	270	<68
Naphthalene	300	<330	<80	<470	<250	<93	<160	<32	100	<82
Phenanthrene	290	460	16	410	440	110	<27	<5.3	240	100
Pyrene	99	580	<13	640	540	160	<27	<5.3	310	85
<b>Metals (mg/kg)</b>										
Antimony	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Arsenic	<b>5.2</b>	<b>12</b>	<b>&lt;2.9</b>	<b>7.1</b>	<b>12</b>	<b>9.3</b>	<b>14</b>	NA	<b>9.4</b>	NA
Barium	<b>1,100</b>	58 B	110 B	9.6 B	140 B	79	39	NA	160	NA
Beryllium	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Cadmium	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Chromium, trivalent	11	11	22	15	58	89	14	NA	8.7	NA
Copper	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Lead	<b>290</b>	<b>52</b>	7.5	29	<b>59</b>	<b>230</b>	<b>150</b>	NA	<b>460</b>	NA
Mercury	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Nickel	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Selenium	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Silver	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Zinc	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

- Generic regulatory criteria not established.
- Underline Value exceeds NR 720 residual contaminant levels (RCLs) for protection of groundwater.
- Bold** Value exceeds the generic NR 720 industrial direct contact RCLs.
- Box** Value exceeds the generic NR 720 industrial direct contact RCLs.
- DRO Diesel Range Organics.
- GRO Gasoline Range Organics.
- GW Pathway WDNR NR720 RCLs for protection of groundwater or NR 746 residual product (whichever is lesser).
- µg/kg Micrograms per kilogram.
- mg/kg Milligrams per kilogram.
- NA Not analyzed.
- NR720 IND DC WDNR NR720 Generic Industrial Direct Contact RCLs.
- NR720 NON-IND DC WDNR NR720 Generic Non-Industrial Direct Contact RCLs.
- PAHs Polycyclic Aromatic Hydrocarbons.
- Q Sample concentration is less than the practical quantitation limit.
- QU Unquantitated hydrocarbons present outside the reported carbon range.
- RL1 or L1 Report limit raised due to sample matrix effects.
- VOCs Volatile Organic Compounds.

Table 2. Comparison of Site-Wide Soil Analytical Results to Generic Soil Cleanup Standards, Former Meritor Facility, Oshkosh, Wisconsin.

Sample ID	GP-72 (6-8')	GP-73 (0-2')	GP-73 (2-4')	GP-74 (0-2')	GP-74 (2-4')	GP-75 (0-2')	GP-75 (4-6')	GP-76 (2-4')	GP-76 (4-6')	GP-77 (2-4')
Sample Date	04/19/06	04/21/06	04/21/06	04/21/06	04/21/06	04/21/06	04/21/06	04/19/06	04/19/06	04/18/06
DRO (mg/kg)	4,100	NA	380	NA	1,400	NA	66	NA	3,300	NA
GRO (mg/kg)	NA									
<b>VOCs (µg/kg)</b>										
Benzene	<41	NA	<28	NA	<27	NA	<59	<67	<49	NA
cis-1,2-Dichloroethene	NA									
Ethylbenzene	<41	NA	<28	NA	<27	NA	<59	<67	<49	NA
Isopropylbenzene	NA									
Methylene Chloride	NA									
Naphthalene	NA									
n-Propylbenzene	NA									
p-Isopropyltoluene	NA									
sec-Butylbenzene	NA									
Toluene	<41	NA	<28	NA	<27	NA	<59	<67	<49	NA
1,2,4-Trimethylbenzene	<41	NA	<28	NA	32	NA	<59	<67	<49	NA
1,3,5-Trimethylbenzene	<41	NA	<28	NA	<27	NA	<59	<67	<49	NA
Xylene, -o	NA									
Xylenes, -m, -p	NA									
Xylenes, Total	<120	NA	<84	NA	<81	NA	<180	<200	<150	NA
<b>PAHs (µg/kg)</b>										
Acenaphthene	<200	<140	<1,700	<57	<540	170	<120	<280	<1,200	<4,300
Acenaphthylene	<340	<230	<3,000	<97	<920	<94	<200	<470	<2,100	<7,300
Anthracene	130	<14	<170	20	390	250	40	110	570	5,800
Benzo (a) anthracene	570	<14	510	79	1,200	440	130	190	1,500	13,000
Benzo (a) pyrene	460	<14	560	65	1,000	400	94	170	1,400	15,000
Benzo (b) fluoranthene	330	<14	490	55	730	290	75	120	1,000	9,800
Benzo (g,h,i) perylene	340	<14	790	51	720	230	71	120	910	12,000
Benzo (k) fluoranthene	250	<14	<170	28	500	150	79	93	850	7,400
Chrysene	350	<14	460	59	910	350	98	180	1,400	11,000
Dibenzo (a,h) anthracene	58	<20	<260	8.7	140	51	<18	<42	<180	1,800
Fluoranthene	1100	<27	1,300	150	3,000	1,000	300	590	4,400	32,000
Fluorene	78	<27	<350	<11	240	130	<24	<56	<240	2,900
Indeno (1,2,3-cd) pyrene	350	<14	440	51	640	240	75	120	1,000	9,700
1-Methylnaphthalene	<120	<82	<1,000	<34	<330	51	<71	<170	<730	<2,600

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Table 2. Comparison of Site-Wide Soil Analytical Results to Generic Soil Cleanup Standards, Former Meritor Facility, Oshkosh, Wisconsin.

Sample ID	GP-72 (6-8')	GP-73 (0-2')	GP-73 (2-4')	GP-74 (0-2')	GP-74 (2-4')	GP-75 (0-2')	GP-75 (4-6')	GP-76 (2-4')	GP-76 (4-6')	GP-77 (2-4')
Sample Date	04/19/06	04/21/06	04/21/06	04/21/06	04/21/06	04/21/06	04/21/06	04/19/06	04/19/06	04/18/06
<b>PAHs (µg/kg) (continued)</b>										
2-Methylnaphthalene	320	<68	<870	<29	1,300	500	<59	260	<610	14,000
Naphthalene	<120	<82	<1,000	<34	400	230	<71	<170	<730	<2,600
Phenanthrene	610	<14	770	87	<u>2,300</u>	850	190	510	<u>3,200</u>	<u>22,000</u>
Pyrene	650	<14	850	87	2,100	650	100	400	3,400	23,000
<b>Metals (mg/kg)</b>										
Antimony	NA	NA	NA	NA						
Arsenic	<u>10</u>	NA	<u>7.4</u>	NA	<u>19</u>	NA	<u>&lt;5.2</u>	NA	<u>&lt;4.3</u>	<u>6.4</u>
Barium	220	NA	<u>450</u>	NA	240	NA	140	NA	130	<u>1,100</u>
Beryllium	NA	NA	NA	NA						
Cadmium	NA	NA	NA	NA						
Chromium, trivalent	26	NA	19	NA	38	NA	22	NA	11	39
Copper	NA	NA	NA	NA						
Lead	<u>480</u>	NA	<u>61</u>	NA	47	NA	35	NA	<u>170</u>	<u>210</u>
Mercury	NA	NA	NA	NA						
Nickel	NA	NA	NA	NA						
Selenium	NA	NA	NA	NA						
Silver	NA	NA	NA	NA						
Zinc	NA	NA	NA	NA						

- Generic regulatory criteria not established.
- Underline Value exceeds NR 720 residual contaminant levels (RCLs) for protection of groundwater.
- Bold** Value exceeds the generic NR 720 industrial direct contact RCLs.
- Box** Value exceeds the generic NR 720 industrial direct contact RCLs.
- DRO Diesel Range Organics.
- GRO Gasoline Range Organics.
- GW Pathway WDNR NR720 RCLs for protection of groundwater or NR 746 residual product (whichever is lesser).
- µg/kg Micrograms per kilogram.
- mg/kg Milligrams per kilogram.
- NA Not analyzed.
- NR720 IND DC WDNR NR720 Generic Industrial Direct Contact RCLs.
- NR720 NON-IND DC WDNR NR720 Generic Non-Industrial Direct Contact RCLs.
- PAHs Polycyclic Aromatic Hydrocarbons.
- Q Sample concentration is less than the practical quantitation limit.
- QU Unquantitated hydrocarbons present outside the reported carbon range.
- RL1 or L1 Report limit raised due to sample matrix effects.
- VOCs Volatile Organic Compounds.

Table 2. Comparison of Site-Wide Soil Analytical Results to Generic Soil Cleanup Standards, Former Meritor Facility, Oshkosh, Wisconsin.

Sample ID	GP-78 (2-4')	GP-79 (2-4')	GP-80 (0-2')	GP-80 (8-10')	GP-81 (2-4')	GP-81 (8-10')	GP-82 (2-4')	GP-82 (6-8')	GP-83 (10-13')	GP-83 (2-4')
Sample Date	04/18/06	04/18/06	05/03/07	05/03/07	05/03/07	05/03/07	05/03/07	05/03/07	05/03/07	05/03/07
DRO (mg/kg)	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
GRO (mg/kg)	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
<b>VOCs (µg/kg)</b>										
Benzene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
cis-1,2-Dichloroethene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Ethylbenzene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Isopropylbenzene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Methylene Chloride	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Naphthalene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
n-Propylbenzene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
p-Isopropyltoluene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
sec-Butylbenzene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Toluene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,4-Trimethylbenzene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,3,5-Trimethylbenzene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Xylene, -o	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Xylenes, -m, -p	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Xylenes, Total	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
<b>PAHs (µg/kg)</b>										
Acenaphthene	<120	<230	<54	<83	250	<69	<53	<71	<75	<140
Acenaphthylene	<210	<390	<91	<140	<100	<120	<90	<120	<130	<230
Anthracene	130	46	<5.4	<8.3	580	<6.9	<5.3	18	63	20
Benzo (a) anthracene	580	190	<5.4	<8.3	1,700 E	72	<5.3	22	700	190
Benzo (a) pyrene	670	180	<5.4	<8.3	1,700 E	14	<5.3	96	69	110
Benzo (b) fluoranthene	520	130	<5.4	<8.3	1,300	<6.9	<5.3	44	120 L1	47 L1
Benzo (g,h,i) perylene	600	120	<5.4	<8.3	990	<6.9	<5.3	66	<7.5	<14
Benzo (k) fluoranthene	400	90	<5.4	<8.3	830	9.2	<5.3	44	78 L1	<14 L1
Chrysene	520	150	<5.4	<8.3	1,500 E	8.6	<5.3	8	250 L1	140 L1
Dibenzo (a,h) anthracene	92	<34	<8.1	<12	200	<10	<7.9	18	<11	<20
Fluoranthene	1,500	500	<11	<17	3,800 E	55	<11	200	870	430
Fluorene	70	<46	<11	<17	110	<14	<11	16	78	91
Indeno (1,2,3-cd) pyrene	540	120	<5.4	<8.3	1,100 E	<6.9	<5.3	97	<7.5	<14
1-Methylnaphthalene	<74	<140	<32	<50	97	<41	<32	180	<45	<81

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Table 2. Comparison of Site-Wide Soil Analytical Results to Generic Soil Cleanup Standards, Former Meritor Facility, Oshkosh, Wisconsin.

Sample ID	GP-78 (2-4')	GP-79 (2-4')	GP-80 (0-2')	GP-80 (8-10')	GP-81 (2-4')	GP-81 (8-10')	GP-82 (2-4')	GP-82 (6-8')	GP-83 (10-13')	GP-83 (2-4')
Sample Date	04/18/06	04/18/06	05/03/07	05/03/07	05/03/07	05/03/07	05/03/07	05/03/07	05/03/07	05/03/07
<b>PAHs (µg/kg) (continued)</b>										
2-Methylnaphthalene	410	<110	<27	<41	520	<34	<26	280	76	<68
Naphthalene	<74	<140	<32	<50	<u>470</u>	<41	<32	210	<45	<81
Phenanthrene	870	130	<5.4	46	<u>2,200 E</u>	7.5	<5.3	120	360	140
Pyrene	1,200	380	<5.4	<8.3	3,200 E	<6.9	<5.3	370	2,000	110
<b>Metals (mg/kg)</b>										
Antimony	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Arsenic	<b>5.7</b>	<b>8.8</b>	<b>8</b>	<b>5.2</b>	<b>11</b>	<b>3.3</b>	<b>10</b>	<b>7.1</b>	<b>7.8</b>	<b>9.9</b>
Barium	<u>2,300</u>	58	17	100	<u>1,200</u>	90	15	74	64	260
Beryllium	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Cadmium	NA	NA	<0.11	0.52	0.69	0.74	<0.11	0.45	0.49	0.14
Chromium, trivalent	6.1	11	6.6	19	24	21	4.7	8.2	18	20
Copper	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Lead	<b>140</b>	17	8.6	8.2	<b>83</b>	6.8	29	27	10	<b>100</b>
Mercury	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Nickel	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Selenium	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Silver	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Zinc	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

- Generic regulatory criteria not established.
- Underline Value exceeds NR 720 residual contaminant levels (RCLs) for protection of groundwater.
- Bold** Value exceeds the generic NR 720 industrial direct contact RCLs.
- Box** Value exceeds the generic NR 720 industrial direct contact RCLs.
- DRO Diesel Range Organics.
- GRO Gasoline Range Organics.
- GW Pathway WDNR NR720 RCLs for protection of groundwater or NR 746 residual product (whichever is lesser).
- µg/kg Micrograms per kilogram.
- mg/kg Milligrams per kilogram.
- NA Not analyzed.
- NR720 IND DC WDNR NR720 Generic Industrial Direct Contact RCLs.
- NR720 NON-IND DC WDNR NR720 Generic Non-Industrial Direct Contact RCLs.
- PAHs Polycyclic Aromatic Hydrocarbons.
- Q Sample concentration is less than the practical quantitation limit.
- QU Unquantitated hydrocarbons present outside the reported carbon range.
- RL1 or L1 Report limit raised due to sample matrix effects.
- VOCs Volatile Organic Compounds.

Table 2. Comparison of Site-Wide Soil Analytical Results to Generic Soil Cleanup Standards, Former Meritor Facility, Oshkosh, Wisconsin.

Sample ID	GP-83 (6-8')	GP-84 (2-4')	GP-84 (6-8')	GP-85 (2-4')	GP-85 (6-8')	GP-86 (2-4')	GP-86 (6-8')	GP-87 (0-2')	GP-87 (4-6')	GP-88 (0-2')
Sample Date	05/03/07	05/03/07	05/03/07	05/03/07	05/03/07	05/03/07	05/03/07	05/03/07	05/03/07	05/03/07
DRO (mg/kg)	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
GRO (mg/kg)	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
<b>VOCs (µg/kg)</b>										
Benzene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
cis-1,2-Dichloroethene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Ethylbenzene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Isopropylbenzene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Methylene Chloride	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Naphthalene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
n-Propylbenzene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
p-Isopropyltoluene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
sec-Butylbenzene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Toluene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,4-Trimethylbenzene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,3,5-Trimethylbenzene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Xylene, -o	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Xylenes, -m, -p	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Xylenes, Total	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
<b>PAHs (µg/kg)</b>										
Acenaphthene	<1,100	<65	<64	<80	<66	33,000	<370	<460	<210	NA
Acenaphthylene	<1,900	<110	<110	<140	<110	12,000	<640	<780	<360	NA
Anthracene	160	<6.5	<6.4	<8.0	<6.6	100,000	<37	<46	23	NA
Benzo (a) anthracene	<110	<6.5	<6.4	20	<6.6	180,000 E	90	<46	170	NA
Benzo (a) pyrene	<110	<6.5	<6.4	20	<6.6	180,000 E	82	<46	170	NA
Benzo (b) fluoranthene	<110 L1	<6.5 L1	<6.4 L1	16 L1	<6.6	130,000 L1	71 L1	<46	130	NA
Benzo (g,h,i) perylene	<110	<6.5	<6.4	9.7	<6.6	110,000	83	<46	150	NA
Benzo (k) fluoranthene	<110 L1	<6.5 L1	<6.4 L1	9.3 L1	<6.6	85,000 L1	39 L1	<46	35	NA
Chrysene	<110 L1	<6.5 L1	<6.4 L1	18 L1	<6.6	170,000 E, L1	86 L1	<46	120	NA
Dibenzo (a,h) anthracene	<160	<9.8	<9.6	<12	<9.9	18,000	<56	<69	<32	NA
Fluoranthene	2,600	<13	<13	44	<13	610,000 E	270	<92	330	NA
Fluorene	250	<13	<13	<16	<13	87,000	<75	<92	<42	NA
Indeno (1,2,3-cd) pyrene	<110	<6.5	<6.4	14	<6.6	120,000 E	58	<46	110	NA
1-Methylnaphthalene	<660	<39	<38	<48	<40	40,000	<220	<280	<130	NA

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Table 2. Comparison of Site-Wide Soil Analytical Results to Generic Soil Cleanup Standards, Former Meritor Facility, Oshkosh, Wisconsin.

Sample ID	GP-83 (6-8')	GP-84 (2-4')	GP-84 (6-8')	GP-85 (2-4')	GP-85 (6-8')	GP-86 (2-4')	GP-86 (6-8')	GP-87 (0-2')	GP-87 (4-6')	GP-88 (0-2')
Sample Date	05/03/07	05/03/07	05/03/07	05/03/07	05/03/07	05/03/07	05/03/07	05/03/07	05/03/07	05/03/07
<b>PAHs (µg/kg) (continued)</b>										
2-Methylnaphthalene	<550	<33	<32	<40	<33	300,000	<190	<230	<110	NA
Naphthalene	<660	<39	<38	<48	42	92,000	<220	<280	<130	NA
Phenanthrene	950	<6.5	<6.4	19	<6.6	510,000 E	160	<46	180	NA
Pyrene	4,000	<6.5	<6.4	29	<6.6	420,000 E	210	<46	220	NA
<b>Metals (mg/kg)</b>										
Antimony	NA									
Arsenic	<b>11</b>	<b>10</b>	<b>9</b>	<b>31</b>	<b>13</b>	<b>9.8</b>	<b>10</b>	<b>9.9</b>	<b>9.6</b>	NA
Barium	120	2.6	2.5	78	130	170	81	30	140	NA
Beryllium	NA									
Cadmium	1.1	<0.10	<0.10	1.5	1.4	0.93	0.67	<0.11	0.59	NA
Chromium, trivalent	23	1.9	2.1	11	29	22	22	9.9	17	NA
Copper	NA									
Lead	18	13	13	<b>85</b>	18	<b>200</b>	11	<b>95</b>	<b>280</b>	NA
Mercury	NA									
Nickel	NA									
Selenium	NA									
Silver	NA									
Zinc	NA									

- Generic regulatory criteria not established.
- Underline Value exceeds NR 720 residual contaminant levels (RCLs) for protection of groundwater.
- Bold** Value exceeds the generic NR 720 industrial direct contact RCLs.
- Box** Value exceeds the generic NR 720 industrial direct contact RCLs.
- DRO Diesel Range Organics.
- GRO Gasoline Range Organics.
- GW Pathway WDNR NR720 RCLs for protection of groundwater or NR 746 residual product (whichever is lesser).
- µg/kg Micrograms per kilogram.
- mg/kg Milligrams per kilogram.
- NA Not analyzed.
- NR720 IND DC WDNR NR720 Generic Industrial Direct Contact RCLs.
- NR720 NON-IND DC WDNR NR720 Generic Non-Industrial Direct Contact RCLs.
- PAHs Polycyclic Aromatic Hydrocarbons.
- Q Sample concentration is less than the practical quantitation limit.
- QU Unquantitated hydrocarbons present outside the reported carbon range.
- RL1 or L1 Report limit raised due to sample matrix effects.
- VOCs Volatile Organic Compounds.

Table 2. Comparison of Site-Wide Soil Analytical Results to Generic Soil Cleanup Standards, Former Meritor Facility, Oshkosh, Wisconsin.

Sample ID	GP-88 (8-10')	GP-89 (2-4')	GP-89 (6-8')	GP-90 (2-4')	GP-90 (6-8')	GP-91 (10-13')	GP-91 (2-4')	GP-91 (6-8')	GP-92 (10-13')
Sample Date	05/03/07	05/03/07	05/03/07	05/03/07	05/03/07	05/03/07	05/03/07	05/03/07	05/03/07
DRO (mg/kg)	NA	NA	NA	NA	NA	NA	NA	NA	NA
GRO (mg/kg)	NA	NA	NA	NA	NA	NA	NA	NA	NA
<b>VOCs (µg/kg)</b>									
Benzene	NA	NA	NA	NA	NA	NA	NA	NA	NA
cis-1,2-Dichloroethene	NA	NA	NA	NA	NA	NA	NA	NA	NA
Ethylbenzene	NA	NA	NA	NA	NA	NA	NA	NA	NA
Isopropylbenzene	NA	NA	NA	NA	NA	NA	NA	NA	NA
Methylene Chloride	NA	NA	NA	NA	NA	NA	NA	NA	NA
Naphthalene	NA	NA	NA	NA	NA	NA	NA	NA	NA
n-Propylbenzene	NA	NA	NA	NA	NA	NA	NA	NA	NA
p-Isopropyltoluene	NA	NA	NA	NA	NA	NA	NA	NA	NA
sec-Butylbenzene	NA	NA	NA	NA	NA	NA	NA	NA	NA
Toluene	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,4-Trimethylbenzene	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,3,5-Trimethylbenzene	NA	NA	NA	NA	NA	NA	NA	NA	NA
Xylene, -o	NA	NA	NA	NA	NA	NA	NA	NA	NA
Xylenes, -m, -p	NA	NA	NA	NA	NA	NA	NA	NA	NA
Xylenes, Total	NA	NA	NA	NA	NA	NA	NA	NA	NA
<b>PAHs (µg/kg)</b>									
Acenaphthene	NA	<75	<93	<82	<72	<66	<130	<73	<54
Acenaphthylene	NA	<130	<160	<140	<120	<110	<230	<120	<92
Anthracene	NA	<7.5	<9.3	<8.2	19	<6.6	<13	57	<5.4
Benzo (a) anthracene	NA	<7.5	<9.3	<8.2	150	9.3	24	260	6.9
Benzo (a) pyrene	NA	9.1	<9.3	<8.2	420	9.8	58	270	8
Benzo (b) fluoranthene	NA	12	<9.3	<8.2	250	<6.6	32	220	6.5
Benzo (g,h,i) perylene	NA	<7.5	<9.3	<8.2	450	6.8	74	190	<5.4
Benzo (k) fluoranthene	NA	<7.5	<9.3	<8.2	130	<6.6	29	120	5.5
Chrysene	NA	<7.5	<9.3	<8.2	97	7.2	34	250	7.2
Dibenzo (a,h) anthracene	NA	<11	<14	<12	81	<9.9	<20	32	<8.1
Fluoranthene	NA	18	<19	<16	150	27	92	530	25
Fluorene	NA	<15	<19	<16	<14	<13	<27	<15	<11
Indeno (1,2,3-cd) pyrene	NA	<7.5	<9.3	<8.2	430	<6.6	52	210	5.6
1-Methylnaphthalene	NA	<45	<56	<49	<43	<39	<81	<44	<32

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**Table 2. Comparison of Site-Wide Soil Analytical Results to Generic Soil Cleanup Standards, Former Meritor Facility, Oshkosh, Wisconsin.**

Sample ID	GP-88 (8-10")	GP-89 (2-4")	GP-89 (6-8")	GP-90 (2-4")	GP-90 (6-8")	GP-91 (10-13")	GP-91 (2-4")	GP-91 (6-8")	GP-92 (10-13")
Sample Date	05/03/07	05/03/07	05/03/07	05/03/07	05/03/07	05/03/07	05/03/07	05/03/07	05/03/07
<b>PAHs (µg/kg) (continued)</b>									
2-Methylnaphthalene	NA	<38	<46	<41	72	<33	<67	<37	<27
Naphthalene	NA	<45	<56	<49	<43	<39	<81	<44	<32
Phenanthrene	NA	11	<9.3	<8.2	88	9.6	45	220	12
Pyrene	NA	14	<9.3	<8.2	77	23	130	580	17
<b>Metals (mg/kg)</b>									
Antimony	NA	NA	NA	NA	NA	NA	NA	NA	NA
Arsenic	NA	<b>7.7</b>	<b>&lt;2.5</b>	<b>6.2</b>	<b>7.4</b>	<b>6.1</b>	<b>3.7</b>	<b>7.2</b>	<b>11</b>
Barium	NA	110	100	110	54	6.4	59	99	14
Beryllium	NA	NA	NA	NA	NA	NA	NA	NA	NA
Cadmium	NA	1.6	0.73	0.88	0.73	<0.11	0.25	<0.12	<0.11
Chromium, trivalent	NA	21	16	25	23	4.1	13	9.6	4.9
Copper	NA	NA	NA	NA	NA	NA	NA	NA	NA
Lead	NA	47	13	9.7	40	8.3	26	<b>81</b>	11
Mercury	NA	NA	NA	NA	NA	NA	NA	NA	NA
Nickel	NA	NA	NA	NA	NA	NA	NA	NA	NA
Selenium	NA	NA	NA	NA	NA	NA	NA	NA	NA
Silver	NA	NA	NA	NA	NA	NA	NA	NA	NA
Zinc	NA	NA	NA	NA	NA	NA	NA	NA	NA

- Generic regulatory criteria not established.
- Underline Value exceeds NR 720 residual contaminant levels (RCLs) for protection of groundwater.
- Bold** Value exceeds the generic NR 720 industrial direct contact RCLs.
- Box** Value exceeds the generic NR 720 industrial direct contact RCLs.
- DRO Diesel Range Organics.
- GRO Gasoline Range Organics.
- GW Pathway WDNR NR720 RCLs for protection of groundwater or NR 746 residual product (whichever is lesser).
- µg/kg Micrograms per kilogram.
- mg/kg Milligrams per kilogram.
- NA Not analyzed.
- NR720 IND DC WDNR NR720 Generic Industrial Direct Contact RCLs.
- NR720 NON-IND DC WDNR NR720 Generic Non-Industrial Direct Contact RCLs.
- PAHs Polycyclic Aromatic Hydrocarbons.
- Q Sample concentration is less than the practical quantitation limit.
- QU Unquantitated hydrocarbons present outside the reported carbon range.
- RL1 or L1 Report limit raised due to sample matrix effects.
- VOCs Volatile Organic Compounds.

Table 2. Comparison of Site-Wide Soil Analytical Results to Generic Soil Cleanup Standards, Former Meritor Facility, Oshkosh, Wisconsin.

Sample ID	GP-92 (2-4')	GP-92 (6-8')	GP-93 (2-4')	GP-93 (4-6')	GP-93 (8-10')	GP-94 (0-2')	GP-94 (10-13')	GP-94 (6-8')	GP-95 (2-4')	GP-95 (6-8')
Sample Date	05/03/07	05/03/07	05/03/07	05/03/07	05/03/07	05/03/07	05/03/07	05/03/07	05/01/07	05/01/07
DRO (mg/kg)	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
GRO (mg/kg)	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
<b>VOCs (µg/kg)</b>										
Benzene	NA	NA	NA	NA	NA	NA	NA	NA	<27	<51
cis-1,2-Dichloroethene	NA	NA	NA	NA	NA	NA	NA	NA	<27	<51
Ethylbenzene	NA	NA	NA	NA	NA	NA	NA	NA	<27	<51
Isopropylbenzene	NA	NA	NA	NA	NA	NA	NA	NA	<27	<51
Methylene Chloride	NA	NA	NA	NA	NA	NA	NA	NA	230 S2	<100
Naphthalene	NA	NA	NA	NA	NA	NA	NA	NA	<53	<100
n-Propylbenzene	NA	NA	NA	NA	NA	NA	NA	NA	<27	<51
p-Isopropyltoluene	NA	NA	NA	NA	NA	NA	NA	NA	<27	<51
sec-Butylbenzene	NA	NA	NA	NA	NA	NA	NA	NA	<27	<51
Toluene	NA	NA	NA	NA	NA	NA	NA	NA	<27	<51
1,2,4-Trimethylbenzene	NA	NA	NA	NA	NA	NA	NA	NA	<27	<51
1,3,5-Trimethylbenzene	NA	NA	NA	NA	NA	NA	NA	NA	<27	240
Xylene, -o	NA	NA	NA	NA	NA	NA	NA	NA	<27	77
Xylenes, -m, -p	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Xylenes, Total	NA	NA	NA	NA	NA	NA	NA	NA	<90	<170
<b>PAHs (µg/kg)</b>										
Acenaphthene	<64	<68	<73	<240	120	<82	<59	<210	<53	<1,000
Acenaphthylene	<110	<110	<120	<410	<150	<140	<100	<360	<90	<1,700
Anthracene	<6.4	<6.8	19	180	210	86	<5.9	600	<5.3	<100
Benzo (a) anthracene	24	8.3	110	480	490	1,400	<5.9	600	<5.3	<100
Benzo (a) pyrene	28	9.3	230	460	480	270	<5.9	1,200	<5.3	<100
Benzo (b) fluoranthene	24	8.2	170	380	370	120	<5.9	1,200	<5.3	<100
Benzo (g,h,i) perylene	18	<6.8	200	280	280	150	<5.9	650	<5.3 L1	<100 L1
Benzo (k) fluoranthene	12	<6.8	110	240	240	<8.2	<5.9	600	<5.3	<100
Chrysene	22	7.4	120	440	470	190	<5.9	830	<5.3 L1	<100 L1
Dibenzo (a,h) anthracene	<9.6	<10	37	80	55	42	<8.8	1,100	<5.3 L1	<100 L1
Fluoranthene	59	26	210	1400	1700	910	<12	120	<8.0	<150
Fluorene	<13	<14	<15	110	190	57	<12	2,600	<11	490
Indeno (1,2,3-cd) pyrene	20	<6.8	200	340	330	130	<5.9	72	<11	<200
1-Methylnaphthalene	<38	<41	45	<150	170	<49	<35	740	<5.3	<100
								<130	<32	<610

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Table 2. Comparison of Site-Wide Soil Analytical Results to Generic Soil Cleanup Standards, Former Meritor Facility, Oshkosh, Wisconsin.

Sample ID	GP-92 (2-4')	GP-92 (6-8')	GP-93 (2-4')	GP-93 (4-6')	GP-93 (8-10')	GP-94 (0-2')	GP-94 (10-13')	GP-94 (6-8')	GP-95 (2-4')	GP-95 (6-8')
Sample Date	05/03/07	05/03/07	05/03/07	05/03/07	05/03/07	05/03/07	05/03/07	05/03/07	05/01/07	05/01/07
<b>PAHs (µg/kg) (continued)</b>										
2-Methylnaphthalene	<32	<34	89	560	650	<41	<29	250	<27	<510
Naphthalene	<38	<41	<44	170	170	<49	<35	<130	<32	<610
Phenanthrene	31	10	70	1,000	1,200	300	<5.9	1,300	<5.3	210
Pyrene	48	16	120	1,200	1,200	88	<5.9	2,200	<5.3	<100
<b>Metals (mg/kg)</b>										
Antimony	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Arsenic	<b>21</b>	<b>5.2</b>	<b>5.8</b>	<b>4.4</b>	<b>6.9</b>	<b>4.5</b>	<b>2.6</b>	<b>4.9</b>	<b>7.3</b>	<b>5.6</b>
Barium	12	6.3	12	<b>740</b>	55	<b>470</b>	17	77	23	120
Beryllium	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Cadmium	<0.11	<0.11	0.56	0.2	0.47	0.27	<0.10	0.67	<0.11	1.1
Chromium, trivalent	5.9	4.6	4.6	10	20	12	7.3	16	6.8	15
Copper	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Lead	48	11	19	<b>260</b>	8.2	<b>64</b>	4.4	<b>190</b>	11	20
Mercury	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Nickel	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Selenium	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Silver	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Zinc	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

- Generic regulatory criteria not established.
- Underline Value exceeds NR 720 residual contaminant levels (RCLs) for protection of groundwater.
- Bold** Value exceeds the generic NR 720 industrial direct contact RCLs.
- Box** Value exceeds the generic NR 720 industrial direct contact RCLs.
- DRO Diesel Range Organics.
- GRO Gasoline Range Organics.
- GW Pathway WDNR NR720 RCLs for protection of groundwater or NR 746 residual product (whichever is lesser).
- µg/kg Micrograms per kilogram.
- mg/kg Milligrams per kilogram.
- NA Not analyzed.
- NR720 IND DC WDNR NR720 Generic Industrial Direct Contact RCLs.
- NR720 NON-IND DC WDNR NR720 Generic Non-Industrial Direct Contact RCLs.
- PAHs Polycyclic Aromatic Hydrocarbons.
- Q Sample concentration is less than the practical quantitation limit.
- QU Unquantitated hydrocarbons present outside the reported carbon range.
- RL1 or L1 Report limit raised due to sample matrix effects.
- VOCs Volatile Organic Compounds.

Table 2. Comparison of Site-Wide Soil Analytical Results to Generic Soil Cleanup Standards, Former Meritor Facility, Oshkosh, Wisconsin.

Sample ID	GP-96 (2-4')	GP-96 (6-8')	GP-97 (4-6')	GP-97 (6-8')	GP-98 (0-2')	GP-98 (4-6')	GP-99 (2-4')	GP-99 (6-8')	GP-100 (2-4')	GP-100 (6-8')
Sample Date	05/01/07	05/01/07	05/03/07	05/03/07	05/03/07	05/03/07	05/03/07	05/03/07	05/01/07	05/01/07
DRO (mg/kg)	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
GRO (mg/kg)	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
<b>VOCs (µg/kg)</b>										
Benzene	<280 ,RL1	<140	NA	NA						
cis-1,2-Dichloroethene	<280 ,RL1	<140	NA	NA						
Ethylbenzene	<280 ,RL1	<140	NA	NA						
Isopropylbenzene	1,300 RL1	2,900	NA	NA						
Methylene Chloride	820 RL1	300 S2	NA	NA						
Naphthalene	<560 ,RL1	<u>7,200</u>	NA	NA						
n-Propylbenzene	1,200 RL1	2,600	NA	NA						
p-Isopropyltoluene	<280 ,RL1	2,000	NA	NA						
sec-Butylbenzene	360 RL1	620	NA	NA						
Toluene	<280 ,RL1	<140	NA	NA						
1,2,4-Trimethylbenzene	4,300 RL1	9,700	NA	NA						
1,3,5-Trimethylbenzene	1,800 RL1	1,700	NA	NA						
Xylene, -o	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Xylenes, -m, -p	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Xylenes, Total	2,200 RL1	<u>8,300</u>	NA	NA						
<b>PAHs (µg/kg)</b>										
Acenaphthene	<280	11,000	<86	<70	<200	<210	<250	<110	<85	<130
Acenaphthylene	<470	<4,500	<150	<120	<340	<350	<430	<190	<140	<220
Anthracene	120	19,000	<8.6	<7.0	<20	130	640	17	<8.5	29
Benzo (a) anthracene	<28	<u>37,000</u>	<8.6	<7.0	64	<u>150</u>	<u>1,700</u>	<11	<8.5	<u>100</u>
Benzo (a) pyrene	<28	<u>14,000</u>	<8.6	<7.0	<u>76</u>	<u>140</u>	<u>1,600</u>	<u>110</u>	<8.5	<u>90</u>
Benzo (b) fluoranthene	<28	<260 L1	<8.6	<7.0	59	<u>100</u>	<u>930</u>	37	<8.5 L1	71 L1
Benzo (g,h,i) perylene	<28	<u>5,300</u>	<8.6	<7.0	82	110	780	120	<8.5	100
Benzo (k) fluoranthene	<28	<260 L1	<24 RL3	<7.0	41	89	720	19	<8.5 L1	46 L1
Chrysene	<28	<u>17,000 L1</u>	<21 RL3	<7.0	53	140	1400	25	<8.5 L1	93 L1
Dibenzo (a,h) anthracene	<42	<400	<13	<10	<30	<31	<u>180</u>	<u>20</u>	<13	<19
Fluoranthene	<55	83,000	<17 RL3	<14	120	370	3300	200	<17	250
Fluorene	97	23,000	<17	<14	<40	<42	<50	<23	<17	<26
Indeno (1,2,3-cd) pyrene	<28	<u>3,800</u>	<8.6	<7.0	63	<u>96</u>	<u>920</u>	<u>92</u>	<8.5	64
1-Methylnaphthalene	270	18,000	<51	<42	<120	<120	<150	<68	<51	<77

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Table 2. Comparison of Site-Wide Soil Analytical Results to Generic Soil Cleanup Standards, Former Meritor Facility, Oshkosh, Wisconsin.

Sample ID	GP-96 (2-4')	GP-96 (6-8')	GP-97 (4-6')	GP-97 (6-8')	GP-98 (0-2')	GP-98 (4-6')	GP-99 (2-4')	GP-99 (6-8')	GP-100 (2-4')	GP-100 (6-8')
Sample Date	05/01/07	05/01/07	05/03/07	05/03/07	05/03/07	05/03/07	05/03/07	05/03/07	05/01/07	05/01/07
<b>PAHs (µg/kg) (continued)</b>										
2-Methylnaphthalene	490	<b>82,000</b>	<43	<35	<100	<100	<130	<57	<43	<65
Naphthalene	310	<b>16,000</b>	<51	<42	<120	<120	<150	<68	<51	<77
Phenanthrene	440	<b>100,000 E</b>	<8.6 RL3	<7.0	48	310	1,400	100	<8.5	130
Pyrene	<28	43,000	<130 RL3	<7.0	100	370	3,200	100	<8.5	400
<b>Metals (mg/kg)</b>										
Antimony	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Arsenic	<b>22</b>	<b>63</b>	<b>4.8</b>	<b>5.8</b>	<b>8.3</b>	<b>8.5</b>	<b>4.6</b>	<b>11</b>	<b>36</b>	<b>6.7</b>
Barium	270	<b>1200</b>	29	120	<b>1,400</b>	240	310	40	230	86
Beryllium	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Cadmium	1.9	<b>8.6</b>	<0.11	0.8	0.21	0.96	0.22	0.84	3.6	0.95
Chromium, trivalent	230	1100	8.8	28	8.1	12	16	10	140	17
Copper	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Lead	<b>110</b>	<b>800</b>	8	6.3	<b>85</b>	<b>120</b>	<b>58</b>	37	<b>930</b>	48
Mercury	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Nickel	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Selenium	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Silver	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Zinc	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

- Generic regulatory criteria not established.
- Underline Value exceeds NR 720 residual contaminant levels (RCLs) for protection of groundwater.
- Bold** Value exceeds the generic NR 720 industrial direct contact RCLs.
- Box** Value exceeds the generic NR 720 industrial direct contact RCLs.
- DRO Diesel Range Organics.
- GRO Gasoline Range Organics.
- GW Pathway WDNR NR720 RCLs for protection of groundwater or NR 746 residual product (whichever is lesser).
- µg/kg Micrograms per kilogram.
- mg/kg Milligrams per kilogram.
- NA Not analyzed.
- NR720 IND DC WDNR NR720 Generic Industrial Direct Contact RCLs.
- NR720 NON-IND DC WDNR NR720 Generic Non-Industrial Direct Contact RCLs.
- PAHs Polycyclic Aromatic Hydrocarbons.
- Q Sample concentration is less than the practical quantitation limit.
- QU Unquantitated hydrocarbons present outside the reported carbon range.
- RL1 or L1 Report limit raised due to sample matrix effects.
- VOCs Volatile Organic Compounds.

Table 2. Comparison of Site-Wide Soil Analytical Results to Generic Soil Cleanup Standards, Former Meritor Facility, Oshkosh, Wisconsin.

Sample ID	GP-101 (0-2')	GP-101 (4-6')	GP-102 (2-4')	GP-102 (6-8')	GP-103 (2-4')	GP-103 (6-8')	GP-104 (2-4')	GP-104 '(6-8')	GP-105 (2-4')
Sample Date	05/03/07	05/03/07	05/03/07	05/03/07	05/03/07	05/03/07	05/03/07	05/03/07	05/03/07
DRO (mg/kg)	NA	NA							
GRO (mg/kg)	NA	NA							
<b>VOCs (µg/kg)</b>									
Benzene	NA	NA							
cis-1,2-Dichloroethene	NA	NA							
Ethylbenzene	NA	NA							
Isopropylbenzene	NA	NA							
Methylene Chloride	NA	NA							
Naphthalene	NA	NA							
n-Propylbenzene	NA	NA							
p-Isopropyltoluene	NA	NA							
sec-Butylbenzene	NA	NA							
Toluene	NA	NA							
1,2,4-Trimethylbenzene	NA	NA							
1,3,5-Trimethylbenzene	NA	NA							
Xylene, -o	NA	NA							
Xylenes, -m, -p	NA	NA							
Xylenes, Total	NA	NA							
<b>PAHs (µg/kg)</b>									
Acenaphthene	<69	<63	<72	<60	<130	<65	<1,100	<66	<460
Acenaphthylene	<120	<110	<120	<100	<220	<110	<1,800	<110	<790
Anthracene	<6.9	<6.3	<7.2	<6.0	25	<6.5	370	<6.6	610
Benzo (a) anthracene	8.2	<6.3	7.3	<6.0	150	<6.5	1,700	<6.6	1,900
Benzo (a) pyrene	12	<6.3	52	<6.0	170	<6.5	1,900	<6.6	2,300
Benzo (b) fluoranthene	8.2	<6.3	59	<6.0	130	<6.5	1,400	<6.6	1,800
Benzo (g,h,i) perylene	7.6	<6.3	93	<6.0	120	<6.5	1,300	<6.6	1,300
Benzo (k) fluoranthene	<6.9	<6.3	47	<6.0	200	<6.5	970	<6.6	1,200
Chrysene	8.5	<6.3	16	<6.0	140	<6.5	1,700	<6.6	2,000
Dibenzo (a,h) anthracene	<10	<9.5	17	<9.1	27	<9.8	280	<10	280
Fluoranthene	26	<13	29	13	360	<13	4,700	<13	6,200
Fluorene	<14	<13	<14	<12	<26	<13	250	<13	460
Indeno (1,2,3-cd) pyrene	9.1	<6.3	60	<6.0	120	<6.5	1,400	<6.6	1,600
1-Methylnaphthalene	<41	<38	<43	<36	130	<39	<640	<40	<280

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**Table 2. Comparison of Site-Wide Soil Analytical Results to Generic Soil Cleanup Standards, Former Meritor Facility, Oshkosh, Wisconsin.**

Sample ID	GP-101 (0-2')	GP-101 (4-6')	GP-102 (2-4')	GP-102 (6-8')	GP-103 (2-4')	GP-103 (6-8')	GP-104 (2-4')	GP-104 (6-8')	GP-105 (2-4')
Sample Date	05/03/07	05/03/07	05/03/07	05/03/07	05/03/07	05/03/07	05/03/07	05/03/07	05/03/07
<b>PAHs (µg/kg) (continued)</b>									
2-Methylnaphthalene	<34	<32	<36	<30	330	<33	<530	<33	<230
Naphthalene	<41	<38	71	<36	110	<39	<640	<40	<280
Phenanthrene	<6.9	<6.3	12	<6.0	180	<6.5	<u>2,200</u>	<6.6	<u>3,700</u>
Pyrene	11	<6.3	14	6.3	580	<6.5	5,900	<6.6	4,900
<b>Metals (mg/kg)</b>									
Antimony	NA	NA	NA						
Arsenic	<b>2.2</b>	<b>4.9</b>	<b>2</b>	<b>3.8</b>	<b>11</b>	<b>2.5</b>	<b>&lt;4.7</b>	<b>1.8</b>	<b>3.3</b>
Barium	8	10	9.4	9.1	<u>370</u>	62	150	58	93
Beryllium	NA	NA	NA						
Cadmium	<0.11	<0.13	<0.12	<0.12	1.3	0.43	1	0.43	1.6
Chromium, trivalent	4.8	6.6	3.8	4	83	20	6.1	18	14
Copper	NA	NA	NA						
Lead	3.9	4.8	4.2	3.6	<b>520</b>	5.9	<b>190</b>	3.6	<b>150</b>
Mercury	NA	NA	NA						
Nickel	NA	NA	NA						
Selenium	NA	NA	NA						
Silver	NA	NA	NA						
Zinc	NA	NA	NA						

- Generic regulatory criteria not established.
- Underline Value exceeds NR 720 residual contaminant levels (RCLs) for protection of groundwater.
- Bold** Value exceeds the generic NR 720 industrial direct contact RCLs.
- Box** Value exceeds the generic NR 720 industrial direct contact RCLs.
- DRO Diesel Range Organics.
- GRO Gasoline Range Organics.
- GW Pathway WDNR NR720 RCLs for protection of groundwater or NR 746 residual product (whichever is lesser).
- µg/kg Micrograms per kilogram.
- mg/kg Milligrams per kilogram.
- NA Not analyzed.
- NR720 IND DC WDNR NR720 Generic Industrial Direct Contact RCLs.
- NR720 NON-IND DC WDNR NR720 Generic Non-Industrial Direct Contact RCLs.
- PAHs Polycyclic Aromatic Hydrocarbons.
- Q Sample concentration is less than the practical quantitation limit.
- QU Unquantitated hydrocarbons present outside the reported carbon range.
- RL1 or L1 Report limit raised due to sample matrix effects.
- VOCs Volatile Organic Compounds.

Table 2. Comparison of Site-Wide Soil Analytical Results to Generic Soil Cleanup Standards, Former Meritor Facility, Oshkosh, Wisconsin.

Sample ID	GP-105 (6-8')	GP-106 (0-2')	GP-106 (4-6')	GP-107 (0-2')	GP-108 (0-2')	GP-109 (2-4')	GP-110 (0-2')	GP-110 (2-4')	GP-111 (0-2')
Sample Date	05/03/07	05/03/07	05/03/07	06/15/09	06/15/09	06/15/09	06/15/09	06/15/09	06/15/09
DRO (mg/kg)	NA								
GRO (mg/kg)	NA								
<b>VOCs (µg/kg)</b>									
Benzene	NA								
cis-1,2-Dichloroethene	NA								
Ethylbenzene	NA								
Isopropylbenzene	NA								
Methylene Chloride	NA								
Naphthalene	NA								
n-Propylbenzene	NA								
p-Isopropyltoluene	NA								
sec-Butylbenzene	NA								
Toluene	NA								
1,2,4-Trimethylbenzene	NA								
1,3,5-Trimethylbenzene	NA								
Xylene, -o	NA								
Xylenes, -m, -p	NA								
Xylenes, Total	NA								
<b>PAHs (µg/kg)</b>									
Acenaphthene	<68	<90	<180	<240	<240	<83	<270	NA	<58
Acenaphthylene	<120	<150	<300	<400	<400	<140	<450	NA	<98
Anthracene	<6.8	<9.0	<18	150	78	12	41	NA	24
Benzo (a) anthracene	<6.8	11	<18	520	270	180	<27	NA	130
Benzo (a) pyrene	<6.8	25	25	670	200	44	<27	NA	34
Benzo (b) fluoranthene	<6.8	17	23	960	500	49	<27	NA	79
Benzo (g,h,i) perylene	<6.8	31	<18	740	220	37	<27	NA	41
Benzo (k) fluoranthene	<6.8	<9.0	<18	530	100	85	<27	NA	17
Chrysene	<6.8	19	19	1,200	700	96	<27	NA	89
Dibenzo (a,h) anthracene	<10	<14	<27	80	<36	<12	<40	NA	<8.7
Fluoranthene	<14	69	80	2,300	1,000	160	450	NA	370
Fluorene	<14	<18	<36	110	53	130	<53	NA	93
Indeno (1,2,3-cd) pyrene	<6.8	<9.0	20	900	330	37	<27	NA	26
1-Methylnaphthalene	<41	130	<110	780	270	220	<160	NA	190

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Table 2. Comparison of Site-Wide Soil Analytical Results to Generic Soil Cleanup Standards, Former Meritor Facility, Oshkosh, Wisconsin.

Sample ID	GP-105 (6-8')	GP-106 (0-2')	GP-106 (4-6')	GP-107 (0-2')	GP-108 (0-2')	GP-109 (2-4')	GP-110 (0-2')	GP-110 (2-4')	GP-111 (0-2')
Sample Date	05/03/07	05/03/07	05/03/07	06/15/09	06/15/09	06/15/09	06/15/09	06/15/09	06/15/09
<b>PAHs (µg/kg) (continued)</b>									
2-Methylnaphthalene	<34	<45	<89	2,200	890	250	290	NA	330
Naphthalene	<41	64	<110	<u>780</u>	330	<u>560</u>	<160	NA	150
Phenanthrene	<6.8	<9.0	37	1,300	480	120	180	NA	170
Pyrene	<6.8	<9.0	39	2,400	1,300	190	630	NA	270
<b>Metals (mg/kg)</b>									
Antimony	NA	NA	NA	NA	NA	NA	NA	NA	NA
Arsenic	<b>7.6</b>	<b>&lt;1.7</b>	<b>&lt;3.2</b>	NA	NA	NA	NA	NA	NA
Barium	140	25	20	NA	NA	NA	NA	NA	NA
Beryllium	NA	NA	NA	NA	NA	NA	NA	NA	NA
Cadmium	0.81	0.2	<0.23	NA	NA	NA	NA	NA	NA
Chromium, trivalent	23	4.8	5.7	NA	NA	NA	NA	NA	NA
Copper	NA	NA	NA	NA	NA	NA	NA	NA	NA
Lead	9.4	16	25	NA	NA	NA	NA	<b>200</b>	NA
Mercury	NA	NA	NA	NA	NA	NA	NA	NA	NA
Nickel	NA	NA	NA	NA	NA	NA	NA	NA	NA
Selenium	NA	NA	NA	NA	NA	NA	NA	NA	NA
Silver	NA	NA	NA	NA	NA	NA	NA	NA	NA
Zinc	NA	NA	NA	NA	NA	NA	NA	NA	NA

- Generic regulatory criteria not established.
- Underline Value exceeds NR 720 residual contaminant levels (RCLs) for protection of groundwater.
- Bold** Value exceeds the generic NR 720 industrial direct contact RCLs.
- Box** Value exceeds the generic NR 720 industrial direct contact RCLs.
- DRO Diesel Range Organics.
- GRO Gasoline Range Organics.
- GW Pathway WDNR NR720 RCLs for protection of groundwater or NR 746 residual product (whichever is lesser).
- µg/kg Micrograms per kilogram.
- mg/kg Milligrams per kilogram.
- NA Not analyzed.
- NR720 IND DC WDNR NR720 Generic Industrial Direct Contact RCLs.
- NR720 NON-IND DC WDNR NR720 Generic Non-Industrial Direct Contact RCLs.
- PAHs Polycyclic Aromatic Hydrocarbons.
- Q Sample concentration is less than the practical quantitation limit.
- QU Unquantitated hydrocarbons present outside the reported carbon range.
- RL1 or L1 Report limit raised due to sample matrix effects.
- VOCs Volatile Organic Compounds.

Table 2. Comparison of Site-Wide Soil Analytical Results to Generic Soil Cleanup Standards, Former Meritor Facility, Oshkosh, Wisconsin.

Sample ID	GP-111 (2-4')	GP-112 (2-4')	GP-112 (4-6')	GP-113 (2-4')	GP-113 (6-8')	GP-114 (2-4')	GP-114 (4-6')	GP-115 (2-4')	GP-115 (4-6')
Sample Date	06/15/09	06/15/09	06/15/09	06/15/09	06/15/09	06/18/09	06/18/09	06/18/09	06/18/09
DRO (mg/kg)	NA								
GRO (mg/kg)	NA								
<b>VOCs (µg/kg)</b>									
Benzene	NA								
cis-1,2-Dichloroethene	NA								
Ethylbenzene	NA								
Isopropylbenzene	NA								
Methylene Chloride	NA								
Naphthalene	NA								
n-Propylbenzene	NA								
p-Isopropyltoluene	NA								
sec-Butylbenzene	NA								
Toluene	NA								
1,2,4-Trimethylbenzene	NA								
1,3,5-Trimethylbenzene	NA								
Xylene, -o	NA								
Xylenes, -m, -p	NA								
Xylenes, Total	NA								
<b>PAHs (µg/kg)</b>									
Acenaphthene	NA	<130	<70	310	<63	NA	NA	<380	1,800
Acenaphthylene	NA	<220	<120	<230	<110	NA	NA	<640	<1,200
Anthracene	NA	110	140	320	<6.3	NA	NA	280	3,700
Benzo (a) anthracene	NA	140	120	1,200	<6.3	NA	NA	1,200	5,000
Benzo (a) pyrene	NA	120	84	1,400	<6.3	NA	NA	1,200	5,400
Benzo (b) fluoranthene	NA	260	93	2,100	<6.3	NA	NA	1,200	7,100
Benzo (g,h,i) perylene	NA	140	70	1,200	<6.3	NA	NA	1,100	4,200
Benzo (k) fluoranthene	NA	85	21	990	8.1	NA	NA	640	3,100
Chrysene	NA	370	190	2,100	<6.3	NA	NA	2,400	7,900
Dibenzo (a,h) anthracene	NA	20	12	160	<9.5	NA	NA	300	420
Fluoranthene	NA	1,100	460	4,900	<13	NA	NA	4,400	21,000
Fluorene	NA	530	340	730	16	NA	NA	120	2,400
Indeno (1,2,3-cd) pyrene	NA	110	110	1,300	<6.3	NA	NA	1,600	4,200
1-Methylnaphthalene	NA	150	180	530	<38	NA	NA	330	1400

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Table 2. Comparison of Site-Wide Soil Analytical Results to Generic Soil Cleanup Standards, Former Meritor Facility, Oshkosh, Wisconsin.

Sample ID	GP-111 (2-4')	GP-112 (2-4')	GP-112 (4-6')	GP-113 (2-4')	GP-113 (6-8')	GP-114 (2-4')	GP-114 (4-6')	GP-115 (2-4')	GP-115 (4-6')
Sample Date	06/15/09	06/15/09	06/15/09	06/15/09	06/15/09	06/18/09	06/18/09	06/18/09	06/18/09
<b>PAHs (µg/kg) (continued)</b>									
2-Methylnaphthalene	NA	640	160	2,000	<38	NA	NA	1,500	7,900
Naphthalene	NA	380	96	<u>990</u>	<38	NA	NA	<u>690</u>	<u>1,900</u>
Phenanthrene	NA	500	370	1,600	8	NA	NA	<u>2,600</u>	<u>15,000</u>
Pyrene	NA	1,300	540	4,900	<6.3	NA	NA	4,900	22,000
<b>Metals (mg/kg)</b>									
Antimony	NA								
Arsenic	NA								
Barium	NA								
Beryllium	NA								
Cadmium	NA								
Chromium, trivalent	NA								
Copper	NA								
Lead	<b>64</b>	NA	NA	NA	NA	<b>58</b>	<b>120</b>	NA	NA
Mercury	NA								
Nickel	NA								
Selenium	NA								
Silver	NA								
Zinc	NA								

- Generic regulatory criteria not established.
- Underline Value exceeds NR 720 residual contaminant levels (RCLs) for protection of groundwater.
- Bold** Value exceeds the generic NR 720 industrial direct contact RCLs.
- Box** Value exceeds the generic NR 720 industrial direct contact RCLs.
- DRO Diesel Range Organics.
- GRO Gasoline Range Organics.
- GW Pathway WDNR NR720 RCLs for protection of groundwater or NR 746 residual product (whichever is lesser).
- µg/kg Micrograms per kilogram.
- mg/kg Milligrams per kilogram.
- NA Not analyzed.
- NR720 IND DC WDNR NR720 Generic Industrial Direct Contact RCLs.
- NR720 NON-IND DC WDNR NR720 Generic Non-Industrial Direct Contact RCLs.
- PAHs Polycyclic Aromatic Hydrocarbons.
- Q Sample concentration is less than the practical quantitation limit.
- QU Unquantitated hydrocarbons present outside the reported carbon range.
- RL1 or L1 Report limit raised due to sample matrix effects.
- VOCs Volatile Organic Compounds.

Table 2. Comparison of Site-Wide Soil Analytical Results to Generic Soil Cleanup Standards, Former Meritor Facility, Oshkosh, Wisconsin.

Sample ID	GP-116 (2-4')	GP-116 (4-6')	GP-117 (2-4')	GP-117 (4-6')	GP-118 (2-4')	GP-118 (4-6')	GP-118 (6-8')	GP-119 (2-4')	GP-119 (6-8')
Sample Date	06/18/09	06/18/09	06/18/09	06/18/09	06/19/09	06/19/09	06/19/09	06/19/09	06/19/09
DRO (mg/kg)	NA								
GRO (mg/kg)	NA								
<b>VOCs (µg/kg)</b>									
Benzene	NA	NA	NA	NA	NA	<540	NA	NA	NA
cis-1,2-Dichloroethene	NA	NA	NA	NA	NA	<540	NA	NA	NA
Ethylbenzene	NA	NA	NA	NA	NA	<540	NA	NA	NA
Isopropylbenzene	NA	NA	NA	NA	NA	9,500	NA	NA	NA
Methylene Chloride	NA	NA	NA	NA	NA	<1,100	NA	NA	NA
Naphthalene	NA	NA	NA	NA	NA	<1,100	NA	NA	NA
n-Propylbenzene	NA	NA	NA	NA	NA	9,500	NA	NA	NA
p-Isopropyltoluene	NA	NA	NA	NA	NA	2,500	NA	NA	NA
sec-Butylbenzene	NA	NA	NA	NA	NA	2,200	NA	NA	NA
Toluene	NA	NA	NA	NA	NA	<540	NA	NA	NA
1,2,4-Trimethylbenzene	NA	NA	NA	NA	NA	30,000	NA	NA	NA
1,3,5-Trimethylbenzene	NA	NA	NA	NA	NA	11,000	NA	NA	NA
Xylene, -o	NA								
Xylenes, -m, -p	NA								
Xylenes, Total	NA	NA	NA	NA	NA	<u>31,000</u>	NA	NA	NA
<b>PAHs (µg/kg)</b>									
Acenaphthene	NA	NA	<56	270	<260	NA	<72	<53	<78
Acenaphthylene	NA	NA	<96	<100	<450	NA	<120	<90	<130
Anthracene	NA	NA	46	98	1,000	NA	360	22	120
Benzo (a) anthracene	NA	NA	160	290	10,000	NA	1,900	490	1,500
Benzo (a) pyrene	NA	NA	120	570	<26	NA	510	<5.3	340
Benzo (b) fluoranthene	NA	NA	380	640	3,300	NA	1,100	310	950
Benzo (g,h,i) perylene	NA	NA	200	680	<26	NA	<7.2	<5.3	<7.8
Benzo (k) fluoranthene	NA	NA	59	280	<26	NA	580	240	350
Chrysene	NA	NA	350	620	15,000 E	NA	4,200	940	880
Dibenzo (a,h) anthracene	NA	NA	27	100	<39	NA	<11	<7.9	<12
Fluoranthene	NA	NA	590	1,000	16,000	NA	3,700	260	2,400
Fluorene	NA	NA	59	630	2,600	NA	590	14	420
Indeno (1,2,3-cd) pyrene	NA	NA	220	420	<26	NA	<7.2	<5.3	<7.8
1-Methylnaphthalene	NA	NA	300	300	3,000	NA	1,600	100	630

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Table 2. Comparison of Site-Wide Soil Analytical Results to Generic Soil Cleanup Standards, Former Meritor Facility, Oshkosh, Wisconsin.

Sample ID	GP-116 (2-4')	GP-116 (4-6')	GP-117 (2-4')	GP-117 (4-6')	GP-118 (2-4')	GP-118 (4-6')	GP-118 (6-8')	GP-119 (2-4')	GP-119 (6-8')
Sample Date	06/18/09	06/18/09	06/18/09	06/18/09	06/19/09	06/19/09	06/19/09	06/19/09	06/19/09
<b>PAHs (µg/kg) (continued)</b>									
2-Methylnaphthalene	NA	NA	650	980	4,000	NA	3,900	<32	1,300
Naphthalene	NA	NA	<u>420</u>	<u>570</u>	<u>5,100</u>	NA	200	<32	260
Phenanthrene	NA	NA	360	440	<u>5,500</u>	NA	<u>4,200</u>	83	1,000
Pyrene	NA	NA	640	650	23,000 E	NA	11,000	320	3,800
<b>Metals (mg/kg)</b>									
Antimony	NA								
Arsenic	NA								
Barium	NA								
Beryllium	NA								
Cadmium	NA								
Chromium, trivalent	NA								
Copper	NA								
Lead	<b>82</b>	<b>170</b>	NA	NA	<b>100</b>	NA	<b>86</b>	33	40
Mercury	NA								
Nickel	NA								
Selenium	NA								
Silver	NA								
Zinc	NA								

- Generic regulatory criteria not established.
- Underline Value exceeds NR 720 residual contaminant levels (RCLs) for protection of groundwater.
- Bold** Value exceeds the generic NR 720 industrial direct contact RCLs.
- Box** Value exceeds the generic NR 720 industrial direct contact RCLs.
- DRO Diesel Range Organics.
- GRO Gasoline Range Organics.
- GW Pathway WDNR NR720 RCLs for protection of groundwater or NR 746 residual product (whichever is lesser).
- µg/kg Micrograms per kilogram.
- mg/kg Milligrams per kilogram.
- NA Not analyzed.
- NR720 IND DC WDNR NR720 Generic Industrial Direct Contact RCLs.
- NR720 NON-IND DC WDNR NR720 Generic Non-Industrial Direct Contact RCLs.
- PAHs Polycyclic Aromatic Hydrocarbons.
- Q Sample concentration is less than the practical quantitation limit.
- QU Unquantitated hydrocarbons present outside the reported carbon range.
- RL1 or L1 Report limit raised due to sample matrix effects.
- VOCs Volatile Organic Compounds.

Table 2. Comparison of Site-Wide Soil Analytical Results to Generic Soil Cleanup Standards, Former Meritor Facility, Oshkosh, Wisconsin.

Sample ID	GP-120 (2-4')	GP-120 (6-8')	EW-1 (4-6')	MW-1 (2-4')	MW-2 (6-8')	MW-3 (2-4')	MW-4 (0-2')	MW-5 (2-4')	MW-6 (6-8')	MW-7 (2-4')
Sample Date	06/19/09	06/19/09	04/27/04	04/28/04	04/29/04	04/29/04	04/30/04	05/03/04	04/30/04	05/04/04
DRO (mg/kg)	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
GRO (mg/kg)	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
<b>VOCs (µg/kg)</b>										
Benzene	NA	NA	<30	<31	<41	<29	<27	<31	<33	<29
cis-1,2-Dichloroethene	NA	NA	<30	<31	<41	<29	<27	<31	<33	<29
Ethylbenzene	NA	NA	<30	<31	<41	<29	<27	<31	<33	<29
Isopropylbenzene	NA	NA	<30	<31	<41	<29	<27	<31	<33	231
Methylene Chloride	NA	NA	<61	<61	<83	<57	<54	<62	<65	<58
Naphthalene	NA	NA	41 Q	<31	43	<29	41	<31	<33	706
n-Propylbenzene	NA	NA	<30	<31	<41	<29	<27	<31	<33	428
p-Isopropyltoluene	NA	NA	<30	<31	66	<29	<27	<31	<33	347
sec-Butylbenzene	NA	NA	<30	<31	<41	<29	<27	<31	<33	914
Toluene	NA	NA	<30	<31	<41	<29	<27	<31	<33	<29
1,2,4-Trimethylbenzene	NA	NA	<30	<31	<41	<29	<27	<31	<33	1160
1,3,5-Trimethylbenzene	NA	NA	<30	<31	<41	<29	<27	<31	<33	266
Xylene, -o	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Xylenes, -m, -p	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Xylenes, Total	NA	NA	<42	<43	<58	<40	<38	<43	<46	<41
<b>PAHs (µg/kg)</b>										
Acenaphthene	<57	3,700	<61	<61	<83	<57	75	<62	<65	<58
Acenaphthylene	<97	<1,200	<100	<100	<140	<97	<92	<110	<110	<98
Anthracene	62	2,700	33	24	38	<5.7	62	11	<6.5	58
Benzo (a) anthracene	2,000	3,800	21	208	496	<5.7	183	50	<6.5	32
Benzo (a) pyrene	<5.7	<69	47	208	48	<5.7	216	34	<6.5	<5.8
Benzo (b) fluoranthene	1,300	2,100	18	171	10	<5.7	162	29	<6.5	8.8
Benzo (g,h,i) perylene	<5.7	520	50	183	<8.3	<5.7	216	62	<6.5	<5.8
Benzo (k) fluoranthene	430	420	56	110	<8.3	<5.7	95	14	<6.5	<5.8
Chrysene	480	18,000	34	183	215	<5.7	183	37	<6.5	10
Dibenzo (a,h) anthracene	<8.5	470	<9.1	40	<12	<8.6	39	<9.3	<9.8	<8.7
Fluoranthene	1,300	48,000	618	465	562	<11	463	137	<13	324
Fluorene	29	3,500	42	<12	50	<11	25	<12	<13	110
Indeno (1,2,3-cd) pyrene	<5.7	<69	8.4	171	<8.3	<5.7	183	50	<6.5	<5.8
1-Methylnaphthalene	84	500	<36	<37	<50	<34	51	<37	<39	359

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Table 2. Comparison of Site-Wide Soil Analytical Results to Generic Soil Cleanup Standards, Former Meritor Facility, Oshkosh, Wisconsin.

Sample ID	GP-120 (2-4')	GP-120 (6-8')	EW-1 (4-6')	MW-1 (2-4')	MW-2 (6-8')	MW-3 (2-4')	MW-4 (0-2')	MW-5 (2-4')	MW-6 (6-8')	MW-7 (2-4')
Sample Date	06/19/09	06/19/09	04/27/04	04/28/04	04/29/04	04/29/04	04/30/04	05/03/04	04/30/04	05/04/04
<b>PAHs (µg/kg) (continued)</b>										
2-Methylnaphthalene	84	11,000	78	183	73	<29	194	<31	<33	683
Naphthalene	42	<u>710</u>	50	<37	<50	<34	<32	<37	<39	78
Phenanthrene	260	<b>23,000</b>	206	159	215	<5.7	237	73	<6.5	243
Pyrene	1,200	66,000 E	120	452	74	<5.7	366	137	<6.5	336
<b>Metals (mg/kg)</b>										
Antimony	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Arsenic	NA	NA	<b>13</b>	<b>9.7</b>	<b>&lt;10 D</b>	<b>&lt;7.1 D</b>	<b>10</b>	<b>21</b>	<b>&lt;8.1 D</b>	<b>&lt;7.2 D</b>
Barium	NA	NA	315	<u>2,200</u>	215	13	75	224	130	43
Beryllium	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Cadmium	NA	NA	1.35	1.3	0.5	0.73	0.95	1.1	0.76	0.5
Chromium, trivalent	NA	NA	40	31	50	8	5.4	55	31	14
Copper	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Lead	<b>68</b>	<b>180</b>	<b>170</b>	<b>120</b>	15	4.5	<b>56</b>	<b>2110</b>	8.1	19
Mercury	NA	NA	0.055	0.29	0.064	<0.011	0.056	0.24	0.023	0.019
Nickel	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Selenium	NA	NA	<13 D	<13 D	<18 D	<13 D	<12 D	<14 D	<14 D	<13 D
Silver	NA	NA	<0.39 D	<0.39 D	<0.53 D	<0.37 D	<0.34 D	<0.40 D	<0.42 D	<0.37 D
Zinc	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

- Generic regulatory criteria not established.
- Underline Value exceeds NR 720 residual contaminant levels (RCLs) for protection of groundwater.
- Bold** Value exceeds the generic NR 720 industrial direct contact RCLs.
- Box** Value exceeds the generic NR 720 industrial direct contact RCLs.
- DRO Diesel Range Organics.
- GRO Gasoline Range Organics.
- GW Pathway WDNR NR720 RCLs for protection of groundwater or NR 746 residual product (whichever is lesser).
- µg/kg Micrograms per kilogram.
- mg/kg Milligrams per kilogram.
- NA Not analyzed.
- NR720 IND DC WDNR NR720 Generic Industrial Direct Contact RCLs.
- NR720 NON-IND DC WDNR NR720 Generic Non-Industrial Direct Contact RCLs.
- PAHs Polycyclic Aromatic Hydrocarbons.
- Q Sample concentration is less than the practical quantitation limit.
- QU Unquantitated hydrocarbons present outside the reported carbon range.
- RL1 or L1 Report limit raised due to sample matrix effects.
- VOCs Volatile Organic Compounds.

**Table 2. Comparison of Site-Wide Soil Analytical Results to Generic Soil Cleanup Standards, Former Meritor Facility, Oshkosh, Wisconsin.**

Sample ID	MW-8 (2-4')	MW-9 (2-4')	MW-10 (6-8')	MW-11 (4-6')	MW-12 (2-4')	MW-13 (10-13')	MW-13 (2-4')	MW-13 (6-8')	MW-14 (10-13')
Sample Date	05/03/04	04/30/04	05/04/04	05/03/04	05/03/04	05/01/07	05/01/07	05/01/07	05/01/07
DRO (mg/kg)	NA	NA	NA	NA	NA	NA	NA	NA	NA
GRO (mg/kg)	NA	NA	NA	NA	NA	NA	NA	NA	NA
<b>VOCs (µg/kg)</b>									
Benzene	<30	<33	<29	<35	<75	NA	NA	NA	NA
cis-1,2-Dichloroethene	<30	<33	<29	<35	<75	NA	NA	NA	NA
Ethylbenzene	<30	<33	<29	<35	<75	NA	NA	NA	NA
Isopropylbenzene	<30	<33	<29	<35	<75	NA	NA	NA	NA
Methylene Chloride	<59	<65	<58	<70	<150	NA	NA	NA	NA
Naphthalene	809	78	<29	<35	<75	NA	NA	NA	NA
n-Propylbenzene	<30	<33	<29	<35	<75	NA	NA	NA	NA
p-Isopropyltoluene	<30	<33	<29	<35	<75	NA	NA	NA	NA
sec-Butylbenzene	<30	<33	<29	<35	<75	NA	NA	NA	NA
Toluene	<30	61	<29	<35	<75	NA	NA	NA	NA
1,2,4-Trimethylbenzene	44	60	<29	<35	<75	NA	NA	NA	NA
1,3,5-Trimethylbenzene	<30	<33	<29	<35	<75	NA	NA	NA	NA
Xylene, -o	NA	NA	NA	NA	NA	NA	NA	NA	NA
Xylenes, -m, -p	NA	NA	NA	NA	NA	NA	NA	NA	NA
Xylenes, Total	<42	169	<41	<49	<110	NA	NA	NA	NA
<b>PAHs (µg/kg)</b>									
Acenaphthene	7,970	130	<58	<70	331	<59	<790	<180	<59
Acenaphthylene	<1,000	<110	<99	<120	<260	<100	<1,300	<310	<100
Anthracene	9,750	156	<5.8	<7.0	100	<5.9	<79	38	<5.9
Benzo (a) anthracene	29,700	964	7.1	<7.0	723	<5.9	330	160	<5.9
Benzo (a) pyrene	25,000	938	<5.8	<7.0	753	<5.9	510	210	<5.9
Benzo (b) fluoranthene	20,200	625	10	<7.0	512	<5.9 L1	380 L1	170 L1	<5.9 L1
Benzo (g,h,i) perylene	14,300	742	<5.8	8.5	572	<5.9	590	230	<5.9
Benzo (k) fluoranthene	13,100	430	<5.8	<7.0	361	<5.9 L1	200 L1	120 L1	<5.9 L1
Chrysene	30,900	768	8.2	<7.0	663	<5.9 L1	290 L1	170 L1	<5.9 L1
Dibenzo (a,h) anthracene	3,570	143	<8.7	<11	78	<8.8	<120	30	<8.8
Fluoranthene	111,000	1,820	<12	25	2,020	<12	690	470	<12
Fluorene	14,300	40	<12	<14	69	<12	<160	<37	<12
Indeno (1,2,3-cd) pyrene	16,600	651	<5.8	<7.0	542	<5.9	410	170	<5.9
1-Methylnaphthalene	6,420	130	<35	<42	<90	<35	<470	<110	<35

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Table 2. Comparison of Site-Wide Soil Analytical Results to Generic Soil Cleanup Standards, Former Meritor Facility, Oshkosh, Wisconsin.

Sample ID	MW-8 (2-4')	MW-9 (2-4')	MW-10 (6-8')	MW-11 (4-6')	MW-12 (2-4')	MW-13 (10-13')	MW-13 (2-4')	MW-13 (6-8')	MW-14 (10-13')
Sample Date	05/03/04	04/30/04	05/04/04	05/03/04	05/03/04	05/01/07	05/01/07	05/01/07	05/01/07
<b>PAHs (µg/kg) (continued)</b>									
2-Methylnaphthalene	<u>49,900</u>	781	<29	<35	2,620	<29	<400	<92	<29
Naphthalene	<u>9,630</u>	169	<35	<42	140	<35	<470	<110	<35
Phenanthrene	<b>103,000</b>	677	<5.8	14	753	<5.9	410	190	<5.9
Pyrene	97,500	2,080	10	9.1	2,050	<5.9	460	450	<5.9
<b>Metals (mg/kg)</b>									
Antimony	NA	NA	NA	NA	NA	NA	NA	NA	NA
Arsenic	<b>&lt;7.4 D</b>	<b>16</b>	<b>&lt;7.2 D</b>	<b>&lt;8.7 D</b>	<b>&lt;19 D</b>	<b>8.4</b>	<b>15</b>	<b>8.4</b>	<b>7</b>
Barium	<u>1,660</u>	234	65	97	66	59	190	130	59
Beryllium	NA	NA	NA	NA	NA	NA	NA	NA	NA
Cadmium	<0.33 D	0.86	1.3	0.39	<0.84 D	0.5	1.8	3.1	0.75
Chromium, trivalent	24	14	16	18	5.1	16	28	24	19
Copper	NA	NA	NA	NA	NA	NA	NA	NA	NA
Lead	<b>166</b>	<b>378</b>	21	17	<b>84</b>	13	<b>72</b>	<b>130</b>	22
Mercury	0.094	0.099	0.013	0.043	<0.030	NA	NA	NA	NA
Nickel	NA	NA	NA	NA	NA	NA	NA	NA	NA
Selenium	<13 D	<14 D	<13 D	<15 D	<33 D	NA	NA	NA	NA
Silver	<0.38 D	<0.42 D	<0.37 D	<0.45 D	<0.96 D	NA	NA	NA	NA
Zinc	NA	NA	NA	NA	NA	NA	NA	NA	NA

- Generic regulatory criteria not established.
- Underline Value exceeds NR 720 residual contaminant levels (RCLs) for protection of groundwater.
- Bold** Value exceeds the generic NR 720 industrial direct contact RCLs.
- Box** Value exceeds the generic NR 720 industrial direct contact RCLs.
- DRO Diesel Range Organics.
- GRO Gasoline Range Organics.
- GW Pathway WDNR NR720 RCLs for protection of groundwater or NR 746 residual product (whichever is lesser).
- µg/kg Micrograms per kilogram.
- mg/kg Milligrams per kilogram.
- NA Not analyzed.
- NR720 IND DC WDNR NR720 Generic Industrial Direct Contact RCLs.
- NR720 NON-IND DC WDNR NR720 Generic Non-Industrial Direct Contact RCLs.
- PAHs Polycyclic Aromatic Hydrocarbons.
- Q Sample concentration is less than the practical quantitation limit.
- QU Unquantitated hydrocarbons present outside the reported carbon range.
- RL1 or L1 Report limit raised due to sample matrix effects.
- VOCs Volatile Organic Compounds.

Table 2. Comparison of Site-Wide Soil Analytical Results to Generic Soil Cleanup Standards, Former Meritor Facility, Oshkosh, Wisconsin.

Sample ID	MW-14 (2-4')	MW-14 (6-8')	MW-15 (0-2')	MW-15 (10-12')	MW-15 (4-6')	MW-16 (10-13')	MW-16 (2-4')	MW-16 (6-8')	MW-17 (10-13')
Sample Date	05/01/07	05/01/07	04/30/07	04/30/07	04/30/07	04/30/07	04/30/07	04/30/07	04/30/07
DRO (mg/kg)	NA	NA	NA	NA	NA	NA	NA	NA	NA
GRO (mg/kg)	NA	NA	NA	NA	NA	NA	NA	NA	NA
<b>VOCs (µg/kg)</b>									
Benzene	NA	NA	NA	NA	NA	NA	NA	NA	NA
cis-1,2-Dichloroethene	NA	NA	NA	NA	NA	NA	NA	NA	NA
Ethylbenzene	NA	NA	NA	NA	NA	NA	NA	NA	NA
Isopropylbenzene	NA	NA	NA	NA	NA	NA	NA	NA	NA
Methylene Chloride	NA	NA	NA	NA	NA	NA	NA	NA	NA
Naphthalene	NA	NA	NA	NA	NA	NA	NA	NA	NA
n-Propylbenzene	NA	NA	NA	NA	NA	NA	NA	NA	NA
p-Isopropyltoluene	NA	NA	NA	NA	NA	NA	NA	NA	NA
sec-Butylbenzene	NA	NA	NA	NA	NA	NA	NA	NA	NA
Toluene	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,4-Trimethylbenzene	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,3,5-Trimethylbenzene	NA	NA	NA	NA	NA	NA	NA	NA	NA
Xylene, -o	NA	NA	NA	NA	NA	NA	NA	NA	NA
Xylenes, -m, -p	NA	NA	NA	NA	NA	NA	NA	NA	NA
Xylenes, Total	NA	NA	NA	NA	NA	NA	NA	NA	NA
<b>PAHs (µg/kg)</b>									
Acenaphthene	<140	<69	<660	<76	<480	<110	<99	270	<57
Acenaphthylene	<240	<120	<1,100	<130	<820	<190	<170	<290	<97
Anthracene	130	<6.9	82	<7.6	98	<11	<9.9	22	<5.7
Benzo (a) anthracene	270	<6.9	330	<7.6	130	<11	63	150	<5.7
Benzo (a) pyrene	270	<6.9	410	<7.6	180	<11	93	130	<5.7
Benzo (b) fluoranthene	220 L1	<6.9 L1	310 L1	<7.6	120 L1	<11	67 L1	140 L1	<5.7
Benzo (g,h,i) perylene	240	<6.9	270	<7.6	100	<11	98	100	<5.7
Benzo (k) fluoranthene	150 L1	<6.9 L1	200 L1	<7.6	79 L1	<11	53 L1	130 L1	<5.7
Chrysene	240 L1	<6.9 L1	320 L1	<7.6	120 L1	<11	54 L1	510 L1	<5.7
Dibenzo (a,h) anthracene	31	<10	<99	<11	<72	<16	22	<26	<8.6
Fluoranthene	980	19	820	31	660	<22	91	1100	<11
Fluorene	66	<14	<130	<15	<96	<22	<20	47	<11
Indeno (1,2,3-cd) pyrene	180	<6.9	280	<7.6	98	<11	110	95	<5.7
1-Methylnaphthalene	200	<41	<390	<46	<290	<66	<59	<100	<34

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Table 2. Comparison of Site-Wide Soil Analytical Results to Generic Soil Cleanup Standards, Former Meritor Facility, Oshkosh, Wisconsin.

Sample ID	MW-14 (2-4')	MW-14 (6-8')	MW-15 (0-2')	MW-15 (10-12')	MW-15 (4-6')	MW-16 (10-13')	MW-16 (2-4')	MW-16 (6-8')	MW-17 (10-13')
Sample Date	05/01/07	05/01/07	04/30/07	04/30/07	04/30/07	04/30/07	04/30/07	04/30/07	04/30/07
<b>PAHs (µg/kg) (continued)</b>									
2-Methylnaphthalene	250	<34	<330	<38	<240	<55	<49	<85	<29
Naphthalene	<85	<41	<390	<46	<290	<66	<59	<100	<34
Phenanthrene	580	<6.9	310	<7.6	290	<11	35	570	<5.7
Pyrene	600	9.6	570	<7.6	330	<11	30	91	<5.7
<b>Metals (mg/kg)</b>									
Antimony	NA	NA	NA	NA	NA	NA	NA	NA	NA
Arsenic	<b>5.9</b>	<b>9.1</b>	<b>27</b>	<b>5.2</b>	<b>13</b>	<b>12</b>	<b>5.6</b>	<b>5.2</b>	<b>10</b>
Barium	65	0.27	<u>750</u>	38	<u>470</u>	68	110	<u>870</u>	56
Beryllium	NA	NA	NA	NA	NA	NA	NA	NA	NA
Cadmium	0.46	<0.14	1.7	0.95	1.9	0.49	0.5	<0.34	0.26
Chromium, trivalent	7.8	<0.25	43	8.8	7.3	21	11	2.4	16
Copper	NA	NA	NA	NA	NA	NA	NA	NA	NA
Lead	<b>56</b>	<1.7	<b>190</b>	15	<b>340</b>	12	<b>58</b>	<b>88</b>	11
Mercury	NA	NA	NA	NA	NA	NA	NA	NA	NA
Nickel	NA	NA	NA	NA	NA	NA	NA	NA	NA
Selenium	NA	NA	NA	NA	NA	NA	NA	NA	NA
Silver	NA	NA	NA	NA	NA	NA	NA	NA	NA
Zinc	NA	NA	NA	NA	NA	NA	NA	NA	NA

- Generic regulatory criteria not established.
- Underline Value exceeds NR 720 residual contaminant levels (RCLs) for protection of groundwater.
- Bold** Value exceeds the generic NR 720 industrial direct contact RCLs.
- Box** Value exceeds the generic NR 720 industrial direct contact RCLs.
- DRO Diesel Range Organics.
- GRO Gasoline Range Organics.
- GW Pathway WDNR NR720 RCLs for protection of groundwater or NR 746 residual product (whichever is lesser).
- µg/kg Micrograms per kilogram.
- mg/kg Milligrams per kilogram.
- NA Not analyzed.
- NR720 IND DC WDNR NR720 Generic Industrial Direct Contact RCLs.
- NR720 NON-IND DC WDNR NR720 Generic Non-Industrial Direct Contact RCLs.
- PAHs Polycyclic Aromatic Hydrocarbons.
- Q Sample concentration is less than the practical quantitation limit.
- QU Unquantitated hydrocarbons present outside the reported carbon range.
- RL1 or L1 Report limit raised due to sample matrix effects.
- VOCs Volatile Organic Compounds.

Table 2. Comparison of Site-Wide Soil Analytical Results to Generic Soil Cleanup Standards, Former Meritor Facility, Oshkosh, Wisconsin.

Sample ID	MW-17 (2-4')	MW-17 (6-8')	MW-18 1-2	MW-18 (4-6')	MW-19 (3-4')	MW-19 (6-8')	MW-20 (2-4')	MW-20 (6-8')	MW-21 (4-6')	MW-22 (2-4')
Sample Date	04/30/07	04/30/07	06/16/09	06/16/09	06/16/09	06/16/09	06/16/09	06/16/09	06/16/09	06/17/09
DRO (mg/kg)	NA	NA	NA	NA	NA	NA	NA	NA	190	5.9
GRO (mg/kg)	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
<b>VOCs (µg/kg)</b>										
Benzene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
cis-1,2-Dichloroethene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Ethylbenzene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Isopropylbenzene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Methylene Chloride	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Naphthalene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
n-Propylbenzene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
p-Isopropyltoluene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
sec-Butylbenzene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Toluene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,4-Trimethylbenzene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,3,5-Trimethylbenzene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Xylene, -o	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Xylenes, -m, -p	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Xylenes, Total	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
<b>PAHs (µg/kg)</b>										
Acenaphthene	<59	<120	NA	NA	NA	NA	NA	NA	<120	<51
Acenaphthylene	<100	<200	NA	NA	NA	NA	NA	NA	<200	<88
Anthracene	100	<12	NA	NA	NA	NA	NA	NA	200	<5.1
Benzo (a) anthracene	290	<12	NA	NA	NA	NA	NA	NA	420	<5.1
Benzo (a) pyrene	<5.9	<12	NA	NA	NA	NA	NA	NA	340	<5.1
Benzo (b) fluoranthene	<5.9	<12 L1	NA	NA	NA	NA	NA	NA	570	<5.1
Benzo (g,h,i) perylene	<5.9	<12	NA	NA	NA	NA	NA	NA	300	<5.1
Benzo (k) fluoranthene	<5.9	<12 L1	NA	NA	NA	NA	NA	NA	230	<5.1
Chrysene	140	<12 L1	NA	NA	NA	NA	NA	NA	900	<5.1
Dibenzo (a,h) anthracene	<8.9	<18	NA	NA	NA	NA	NA	NA	<18	<7.7
Fluoranthene	1300	<23	NA	NA	NA	NA	NA	NA	1600	<10
Fluorene	120	<23	NA	NA	NA	NA	NA	NA	500	<10
Indeno (1,2,3-cd) pyrene	<5.9	<12	NA	NA	NA	NA	NA	NA	290	<5.1
1-Methylnaphthalene	190	<70	NA	NA	NA	NA	NA	NA	370	<31

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**Table 2. Comparison of Site-Wide Soil Analytical Results to Generic Soil Cleanup Standards, Former Meritor Facility, Oshkosh, Wisconsin.**

Sample ID	MW-17 (2-4')	MW-17 (6-8')	MW-18 1-2	MW-18 (4-6')	MW-19 (3-4')	MW-19 (6-8')	MW-20 (2-4')	MW-20 (6-8')	MW-21 (4-6')	MW-22 (2-4')
Sample Date	04/30/07	04/30/07	06/16/09	06/16/09	06/16/09	06/16/09	06/16/09	06/16/09	06/16/09	06/17/09
<b>PAHs (µg/kg) (continued)</b>										
2-Methylnaphthalene	930	<59	NA	NA	NA	NA	NA	NA	960	<31
Naphthalene	50	<70	NA	NA	NA	NA	NA	NA	500	<31
Phenanthrene	900	<12	NA	NA	NA	NA	NA	NA	780	5.2
Pyrene	350	<12	NA	NA	NA	NA	NA	NA	3,100	<5.1
<b>Metals (mg/kg)</b>										
Antimony	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Arsenic	<b>11</b>	<b>&lt;2.2</b>	NA	NA	NA	NA	NA	NA	NA	NA
Barium	88	54	100	310	83	100	22	13	NA	NA
Beryllium	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Cadmium	0.67	0.66	NA	NA	NA	NA	NA	NA	NA	NA
Chromium, trivalent	72	15	NA	NA	NA	NA	NA	NA	NA	NA
Copper	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Lead	<b>220</b>	7.2	NA	NA	NA	NA	NA	NA	NA	NA
Mercury	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Nickel	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Selenium	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Silver	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Zinc	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

- Generic regulatory criteria not established.
- Underline Value exceeds NR 720 residual contaminant levels (RCLs) for protection of groundwater.
- Bold** Value exceeds the generic NR 720 industrial direct contact RCLs.
- Box** Value exceeds the generic NR 720 industrial direct contact RCLs.
- DRO Diesel Range Organics.
- GRO Gasoline Range Organics.
- GW Pathway WDNR NR720 RCLs for protection of groundwater or NR 746 residual product (whichever is lesser).
- µg/kg Micrograms per kilogram.
- mg/kg Milligrams per kilogram.
- NA Not analyzed.
- NR720 IND DC WDNR NR720 Generic Industrial Direct Contact RCLs.
- NR720 NON-IND DC WDNR NR720 Generic Non-Industrial Direct Contact RCLs.
- PAHs Polycyclic Aromatic Hydrocarbons.
- Q Sample concentration is less than the practical quantitation limit.
- QU Unquantitated hydrocarbons present outside the reported carbon range.
- RL1 or L1 Report limit raised due to sample matrix effects.
- VOCs Volatile Organic Compounds.

Table 2. Comparison of Site-Wide Soil Analytical Results to Generic Soil Cleanup Standards, Former Meritor Facility, Oshkosh, Wisconsin.

Sample ID	MW-23 (6-8')	MW-24 (4-6')	MW-25 (0-2')	RW-4 (10-12')	RW-4 (2-4')	RW-4 (6-8')	RW-5 (10-12')	RW-5 (2-4')	RW-5 (6-8')	GP-WL-1 (2-4')
Sample Date	06/17/09	06/17/09	06/17/09	05/03/07	05/03/07	05/03/07	05/03/07	05/03/07	05/03/07	05/03/07
DRO (mg/kg)	33	8,200 QU	38	NA	NA	NA	NA	NA	NA	NA
GRO (mg/kg)	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
<b>VOCs (µg/kg)</b>										
Benzene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
cis-1,2-Dichloroethene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Ethylbenzene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Isopropylbenzene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Methylene Chloride	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Naphthalene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
n-Propylbenzene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
p-Isopropyltoluene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
sec-Butylbenzene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Toluene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,4-Trimethylbenzene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,3,5-Trimethylbenzene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Xylene, -o	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Xylenes, -m, -p	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Xylenes, Total	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
<b>PAHs (µg/kg)</b>										
Acenaphthene	<70	<120	<50	<68	<680	<150	<59	<73	<94	<99
Acenaphthylene	<120	<200	<84	<120	<1,200	<250	<100	<120	<160	<170
Anthracene	35	470	<5	18	140	15	<5.9	180	<9.4	61
Benzo (a) anthracene	150	1,500	24	<6.8	580	87	<5.9	640	<9.4	190
Benzo (a) pyrene	29	670	18	<6.8	510	69	<5.9	620	<9.4	170
Benzo (b) fluoranthene	55	1,600	18	<6.8 L1	550 L1	72 L1	<5.9	440	<9.4	120
Benzo (g,h,i) perylene	<7	610	19	<6.8	430	32	<5.9	350	<9.4	110
Benzo (k) fluoranthene	110	<12	9.8	<6.8 L1	200 L1	39 L1	<5.9	250	<9.4	76
Chrysene	250	2,700	31	<6.8 L1	480 L1	55 L1	<5.9	550	<9.4	150
Dibenzo (a,h) anthracene	<11	50	<7.4	<10	<100	<22	<8.8	72	<14	26
Fluoranthene	520	4,500	63	290	1,200	200	<12	1500	<19	380
Fluorene	210	650	<9.9	21	<140	<30	<12	39	<19	<20
Indeno (1,2,3-cd) pyrene	32	580	30	<6.8	330	52	<5.9	380	<9.4	110
1-Methylnaphthalene	180	590	<30	<41	<410	<90	<35	<44	<56	<59

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Table 2. Comparison of Site-Wide Soil Analytical Results to Generic Soil Cleanup Standards, Former Meritor Facility, Oshkosh, Wisconsin.

Sample ID	MW-23 (6-8')	MW-24 (4-6')	MW-25 (0-2')	RW-4 (10-12')	RW-4 (2-4')	RW-4 (6-8')	RW-5 (10-12')	RW-5 (2-4')	RW-5 (6-8')	GP-WL-1 (2-4')
Sample Date	06/17/09	06/17/09	06/17/09	05/03/07	05/03/07	05/03/07	05/03/07	05/03/07	05/03/07	05/03/07
<b>PAHs (µg/kg) (continued)</b>										
2-Methylnaphthalene	370	1,600	<30	39	<340	<75	<29	320	<47	<49
Naphthalene	200	<u>1,000</u>	<30	<41	<410	<90	<35	160	<56	<59
Phenanthrene	260	<u>1,900</u>	16	100	500	91	<5.9	980	21	260
Pyrene	150	8,500	81	<6.8	690	130	<5.9	1,600	<9.4	1,000
<b>Metals (mg/kg)</b>										
Antimony	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Arsenic	NA	NA	NA	<b>13</b>	<b>13</b>	<b>9.5</b>	<b>3</b>	<b>14</b>	<b>7.4</b>	<b>5.5</b>
Barium	NA	NA	NA	140	<u>760</u>	200	58	230	160	75
Beryllium	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Cadmium	NA	NA	NA	0.91	0.72	1.3	0.19	0.34	1.7	1.1
Chromium, trivalent	NA	NA	NA	23	42	21	13	19	36	3.9
Copper	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Lead	NA	NA	NA	13	<b>55</b>	<b>660</b>	5.5	<b>190</b>	11	<b>130</b>
Mercury	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Nickel	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Selenium	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Silver	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Zinc	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

- Generic regulatory criteria not established.
- Underline Value exceeds NR 720 residual contaminant levels (RCLs) for protection of groundwater.
- Bold** Value exceeds the generic NR 720 industrial direct contact RCLs.
- Box** Value exceeds the generic NR 720 industrial direct contact RCLs.
- DRO Diesel Range Organics.
- GRO Gasoline Range Organics.
- GW Pathway WDNR NR720 RCLs for protection of groundwater or NR 746 residual product (whichever is lesser).
- µg/kg Micrograms per kilogram.
- mg/kg Milligrams per kilogram.
- NA Not analyzed.
- NR720 IND DC WDNR NR720 Generic Industrial Direct Contact RCLs.
- NR720 NON-IND DC WDNR NR720 Generic Non-Industrial Direct Contact RCLs.
- PAHs Polycyclic Aromatic Hydrocarbons.
- Q Sample concentration is less than the practical quantitation limit.
- QU Unquantitated hydrocarbons present outside the reported carbon range.
- RL1 or L1 Report limit raised due to sample matrix effects.
- VOCs Volatile Organic Compounds.

Table 2. Comparison of Site-Wide Soil Analytical Results to Generic Soil Cleanup Standards, Former Meritor Facility, Oshkosh, Wisconsin.

Sample ID	GP-WL-1 (6-8')	GP-WL-2 (2-4')	GP-WL-2 (6-8')	GP-WL-3 (2-4')	GP-WL-3 (6-8')	GP-WL-4 (2-4')	GP-WL-4 (6-8')
Sample Date	05/03/07	05/03/07	05/03/07	05/03/07	05/03/07	05/03/07	05/03/07
DRO (mg/kg)	NA						
GRO (mg/kg)	NA						
<b>VOCs (µg/kg)</b>							
Benzene	NA						
cis-1,2-Dichloroethene	NA						
Ethylbenzene	NA						
Isopropylbenzene	NA						
Methylene Chloride	NA						
Naphthalene	NA						
n-Propylbenzene	NA						
p-Isopropyltoluene	NA						
sec-Butylbenzene	NA						
Toluene	NA						
1,2,4-Trimethylbenzene	NA						
1,3,5-Trimethylbenzene	NA						
Xylene, -o	NA						
Xylenes, -m, -p	NA						
Xylenes, Total	NA						
<b>PAHs (µg/kg)</b>							
Acenaphthene	<74	<99	<86	<100	<66	<67	<72
Acenaphthylene	<130	<170	<150	<170	<110	<110	<120
Anthracene	<7.4	31	<8.6	<10	<6.6	17	<7.2
Benzo (a) anthracene	<7.4	270	<8.6	32	<6.6	69	<7.2
Benzo (a) pyrene	<7.4	270	<8.6	39	<6.6	41	<7.2
Benzo (b) fluoranthene	11	290	<8.6	35	<6.6	41	<7.2
Benzo (g,h,i) perylene	<7.4	160	<8.6	28	<6.6	35	<7.2
Benzo (k) fluoranthene	<7.4	170	<8.6	21	<6.6	23	<7.2
Chrysene	<7.4	250	<8.6	36	<6.6	56	<7.2
Dibenzo (a,h) anthracene	<11	46	<13	<15	<9.9	<10	<11
Fluoranthene	<15	340	<17	96	<13	120	<14
Fluorene	<15	<20	<17	<20	<13	<13	<14
Indeno (1,2,3-cd) pyrene	<7.4	170	<8.6	30	<6.6	35	<7.2
1-Methylnaphthalene	<44	110	<52	<61	<40	87	<43

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Table 2. Comparison of Site-Wide Soil Analytical Results to Generic Soil Cleanup Standards, Former Meritor Facility, Oshkosh, Wisconsin.

Sample ID	GP-WL-1 (6-8')	GP-WL-2 (2-4')	GP-WL-2 (6-8')	GP-WL-3 (2-4')	GP-WL-3 (6-8')	GP-WL-4 (2-4')	GP-WL-4 (6-8')
Sample Date	05/03/07	05/03/07	05/03/07	05/03/07	05/03/07	05/03/07	05/03/07
<b>PAHs (µg/kg) (continued)</b>							
2-Methylnaphthalene	<37	280	<43	<51	<33	180	<36
Naphthalene	<44	110	<52	<61	<40	63	<43
Phenanthrene	<7.4	190	<8.6	52	<6.6	98	<7.2
Pyrene	<7.4	280	<8.6	100	<6.6	55	<7.2
<b>Metals (mg/kg)</b>							
Antimony	NA						
Arsenic	<b>3.9</b>	<b>8.6</b>	<b>5.7</b>	<b>5.8</b>	<b>8.2</b>	<b>5.1</b>	<b>7.7</b>
Barium	120	140	120	55	100	37	130
Beryllium	NA						
Cadmium	0.75	0.85	0.89	1.3	0.84	0.86	1.2
Chromium, trivalent	22	12	27	16	28	8.2	33
Copper	NA						
Lead	10	<b>71</b>	9.1	44	8.6	23	6.7
Mercury	NA						
Nickel	NA						
Selenium	NA						
Silver	NA						
Zinc	NA						

- Generic regulatory criteria not established.
- Underline Value exceeds NR 720 residual contaminant levels (RCLs) for protection of groundwater.
- Bold** Value exceeds the generic NR 720 industrial direct contact RCLs.
- Box** Value exceeds the generic NR 720 industrial direct contact RCLs.
- DRO Diesel Range Organics.
- GRO Gasoline Range Organics.
- GW Pathway WDNR NR720 RCLs for protection of groundwater or NR 746 residual product (whichever is lesser).
- µg/kg Micrograms per kilogram.
- mg/kg Milligrams per kilogram.
- NA Not analyzed.
- NR720 IND DC WDNR NR720 Generic Industrial Direct Contact RCLs.
- NR720 NON-IND DC WDNR NR720 Generic Non-Industrial Direct Contact RCLs.
- PAHs Polycyclic Aromatic Hydrocarbons.
- Q Sample concentration is less than the practical quantitation limit.
- QU Unquantitated hydrocarbons present outside the reported carbon range.
- RL1 or L1 Report limit raised due to sample matrix effects.
- VOCs Volatile Organic Compounds.

**Table 3. Summary of Barium Soil and Groundwater Concentrations, Former Meritor Facility, 1005 High Avenue, Oshkosh, Wisconsin.**

ID	Soil Sample Depth	Soil Concentration	Groundwater Concentration
<b>REC 1</b>			
GP-16	8-10'	<b>415</b>	1,120*
GP-17	--	--	154*
GP-35	8-10'	210	550*
GP-38	8-10'	200	150*
GP-45	2-4'	290	250
	6-8'	89	
GP-46	0-2'	13	--
	2-4'	63	
GP-47	4-6'	260	280
	6-8'	150	
GP-80	0-2'	17	210
	8-10'	100	
GP-81	2-4'	<b>1,200</b>	240
	8-10'	90	
MW-1	2-4'	<b>2,200</b>	210
MW-2	6-8'	215	220
EW-1	4-6'	315	190
<b>REC 2</b>			
GP-2	--	--	147*
MW-7	2-4'	43	180
<b>REC 3A</b>			
GP-13	--	--	329*
GP-14	8-10'	313	470*
GP-19	--	--	234*
GP-43	6-8'	140	180*
GP-48	2-4'	<b>1,300</b>	--
	4-6'	<b>590</b>	
GP-49	0-2'	8.6	--
	4-6'	<b>380</b>	
GP-83	2-4'	260	210
	6-8'	120	
	10-13'	64	
RW-4	2-4'	<b>760</b>	270
	6-8'	200	
	10-12'	140	
<b>REC 3B</b>			
GP-3	--	--	5.3*
GP-50	0-2'	330	--
	4-6'	80	
GP-51	0-2'	30	--
	2-4'	<b>400</b>	
GP-52	0-2'	<b>500</b>	--
	2-4'	250	

Footnotes on Page 5.

Table 3. Summary of Barium Soil and Groundwater Concentrations, Former Meritor Facility, 1005 High Avenue, Oshkosh, Wisconsin.

ID	Soil Sample Depth	Soil Concentration	Groundwater Concentration
<b>REC 3B</b>			
<i>(continued)</i>			
GP-85	2-4'	78	
	6-8'	130	--
GP-86	2-4'	170	
	6-8'	81	--
GP-87	0-2'	30	
	4-6'	140	--
GP-88	--	--	160
MW-3	2-4'	13	73
MW-9	2-4'	234	180
<b>REC 3C</b>			
GP-53	0-2'	110	
	2-4'	140	--
GP-54	0-2'	6.2	
	2-4'	<b>2,300</b>	--
<b>REC 3D</b>			
GP-56	4-6'	170	
	6-8'	180	170
GP-57	0-2'	8.1	--
GP-58	2-4'	110	
	4-6'	<b>2,000</b>	--
GP-59	2-4'	46	
	4-5'	33	--
<b>REC 4</b>			
GP-28	0-2'	150	--
GP-29	0-2'	170	--
GP-60	0-2'	69	--
GP-61	4-6'	66	--
<b>REC 5</b>			
GP-32	0-2'	16	160*
GP-62	2-4'	160	
	4-6'	73	220
<b>REC 6</b>			
GP-33	0-2'	30	160*
GP-63	4-6'	<b>1,000</b>	--
GP-64	8-10'	190	250
GP-65	4-6'	130	--
GP-95	2-4'	23	
	6-8'	120	--
GP-96	2-4'	270	
	6-8'	<b>1,200</b>	--

Footnotes on Page 5.

Table 3. Summary of Barium Soil and Groundwater Concentrations, Former Meritor Facility, 1005 High Avenue, Oshkosh, Wisconsin.

ID	Soil Sample Depth	Soil Concentration	Groundwater Concentration
<b>RECs 8&amp;10</b>			
GP-24	0-2'	110	180*
GP-41	0-2'	14	300*
GP-66	0-2'	60	--
	4-6'	1,100	
GP-67	0-2'	58	--
	4-6'	110	
GP-68	0-2'	9.6	--
	4-6'	140	
GP-82	2-4'	15	--
	6-8'	74	
GP-97	4-6'	29	--
	6-8'	120	
GP-98	0-2'	1,400	--
	4-6'	240	
MW-5	2-4'	224	350
<b>REC 11</b>			
GP-4	--	--	6.5*
<b>REC 12</b>			
GP-69	0-2'	79	--
GP-70	0-2'	39	--
<b>REC 13</b>			
GP-42	0-2'	22	150*
GP-44	0-4)	16	320*
GP-71	4-6'	160	--
GP-72	6-8'	220	--
GP-84	2-4'	2.6	--
	6-8'	2.5	
RW-2	--	--	270
RW-3	--	--	190
	2-4'	230	
RW-5	6-8'	160	190
	10-12'	58	
<b>REC 14</b>			
MW-10	6-8'	65	79
<b>REC 15</b>			
GP-34	0-2'	520	--
GP-36	0-2'	1,800	170*
GP-37	0-2'	47	--
GP-73	2-4'	450	--
GP-74	2-4'	240	--
GP-75	4-6'	140	230
GP-99	2-4'	310	--
	6-8'	40	

Footnotes on Page 5.

Table 3. Summary of Barium Soil and Groundwater Concentrations, Former Meritor Facility, 1005 High Avenue, Oshkosh, Wisconsin.

ID	Soil Sample Depth	Soil Concentration	Groundwater Concentration
<b>REC 15</b>			
(continued)			
GP-100	2-4'	230	
	6-8'	86	--
<b>REC 16</b>			
GP-6	--	--	147*
GP-7	--	--	127*
GP-8	--	--	203*
GP-76	4-6'	130	260
GP-101	0-2'	8	
	4-6'	10	38
GP-102	2-4'	9.4	
	6-8'	9.1	--
MW-6	6-8'	130	240
<b>REC 17</b>			
GP-10	--	--	180*
GP-11	2-4'	<b>2,820</b>	310*
GP-12	8-10'	209	<b>6,970*</b>
GP-55	--	--	<b>8,100</b>
GP-77	2-4'	<b>1,100</b>	--
GP-78	2-4'	<b>2,300</b>	--
GP-79	2-4'	58	--
GP-89	2-4'	110	
	6-8'	100	--
GP-90	2-4'	110	
	6-8'	54	--
	2-4'	59	
GP-91	6-8'	99	
	10-13'	6.4	980
	2-4'	12	
GP-92	6-8'	6.3	710
	10-13'	14	
	2-4'	12	
GP-93	4-6'	<b>740</b>	650
	8-10'	55	
	0-2'	<b>470</b>	
GP-94	6-8'	77	<0.61
	10-13'	17	
MW-4	0-2'	75	250
MW-8	2-4'	<b>1,660</b>	<b>12,000</b>
MW-11	4-6'	97	130
	2-4'	190	
MW-13	6-8'	130	340
	10-13'	59	

Footnotes on Page 5.

Table 3. Summary of Barium Soil and Groundwater Concentrations, Former Meritor Facility, 1005 High Avenue, Oshkosh, Wisconsin.

ID	Soil Sample Depth	Soil Concentration	Groundwater Concentration
<b>REC 17</b>			
(continued)			
MW-14	2-4'	65	150
	6-8'	0.27	
	10-13'	59	
MW-15	0-2'	<b>750</b>	2,300
	4-6'	<b>470</b>	
	10-12'	38	
MW-16	2-4'	110	460
	6-8'	<b>870</b>	
	10-13'	68	
MW-17	2-4'	88	790
	6-8'	54	
	10-13'	56	
MW-18	1-2'	100	
	4-6'	310	
MW-19	3-4'	83	
	6-8'	100	
MW-20	2-4'	22	
	6-8'	13	
<b>REC 18</b>			
GP-103	2-4'	<b>370</b>	--
	6-8'	62	
GP-104	2-4'	150	--
	6-8'	58	
GP-105	2-4'	93	--
	6-8'	140	
GP-106	0-2'	25	--
	4-6'	20	
MW-12	2-4'	66	290

\* Groundwater sample collected from a Geoprobe temporary well.

-- Not analyzed.

  Groundwater concentration exceeds the NR 140 Preventive Action Limit of 400 µg/L.

**BOLD** Barium soil concentration exceeds soil to groundwater pathway of 330 mg/kg.

**BOLD** Groundwater concentration exceeds the NR 140 Enforcement Standard of 2,000 µg/L.

Soil Concentrations are in milligrams per kilogram (mg/kg).

Groundwater concentrations are in micrograms per liter (µg/L).

Table 4. Comparison of Site-Wide Surface Soil PAH Analytical Results to s. NR 720.19(5)1 Site-Specific Industrial Direct Contact RCLs, Former Meritor Facility, Oshkosh, Wisconsin.

Sample Location	Specific	GP-29	GP-32	GP-33	GP-44	GP-46	GP-50	GP-51	
Sample ID	NR 720	GP-29 2-4'	GP-32 2-4'	GP-33 2-4'	GP-44 0-4'	GP-46 2-4'	GP-50 0-2'	GP-51 0-2'	GP-51 2-4'
Sample Date	IND RCL	01/14/02	01/15/02	01/15/02	01/16/02	04/18/06	04/18/06	04/18/06	04/18/06
Acenaphthene	6.E+08	<19	<19	<18	<18	<53	<2,200	<2,200	<350
Acenaphthylene	3.6.E+06	18	19	<13	<13	<90	<3,700	<3,700	<590
Anthracene	3.0.E+09	<14	24	25	<13	<5.3	<220	260	380
Benzo(a)anthracene	39,000	25	120	38	<15	17	600	1,000	950
Benzo(a)pyrene	3,900	<14	120	50	<13	26	550	1,100	930
Benzo(b)fluoranthene	39,000	<13	99	35	<12	16	<220	370	580
Benzo(g,h,i)perylene	390,000	<13	88	21	<12	16	620	580	590
Benzo(k)fluoranthene	390,000	<15	120	31	<14	21	300	380	440
Chrysene	3.9.E+06	56	260	120	<15	14	270	620	790
Dibenzo(a,h)anthracene	3,900	<13	40	<12	13	4	<330	<320	96
Fluoranthene	4.0.E+08	<12	170	76	<11	32	1,200	2,200	2,700
Fluorene	4.0.E+08	<14	31	17	<13	<11	<430	<430	140
Indeno(1,2,3-cd)pyrene	39,000	<13	82	20	14	16	260	560	580
1-Methylnaphthalene	7.E+08	<16	84	46	<15	<32	<1,300	<1,300	<210
2-Methylnaphthalene	4.0.E+08	<14	120	67	<13	<27	<1,100	<1,100	830
Naphthalene	39,000	<20	180	35	<18	16	<1,300	<1,300	<210
Phenanthrene	3.9.E+06	<13	250	140	<12	18	670	970	1,400
Pyrene	3.0.E+08	170	260	150	<13	26	350	1,300	1,700
<b>Total PAH Concentrations</b>		269	2,067	871	27	222	4,820	9,340	12,106

All concentrations are in micrograms per kilogram (µg/kg), unless otherwise indicated.

PAH Polycyclic Aromatic Hydrocarbons

**BOLD** Concentration exceeds site specific s. NR 720.19(5)1 Industrial Direct Contact (IND) Residual Contaminant Level (RCL).

Table 4. Comparison of Site-Wide Surface Soil PAH Analytical Results to s. NR 720.19(5)1 Site-Specific Industrial Direct Contact RCLs, Former Meritor Facility, Oshkosh, Wisconsin.

Sample Location	GP-52		GP-53	GP-57	GP-59	GP-62	GP-63	GP-64	GP-65
	GP-52 0-2'	GP-52 2-4'	GP-53 2-4'	GP-57 0-2'	GP-59 2-4'	GP-62 2-4'	GP-63 2-4'	GP-64 2-4'	GP-65 0-2'
Sample ID	GP-52 0-2'	GP-52 2-4'	GP-53 2-4'	GP-57 0-2'	GP-59 2-4'	GP-62 2-4'	GP-63 2-4'	GP-64 2-4'	GP-65 0-2'
Sample Date	04/18/06	04/18/06	04/18/06	04/20/06	04/20/06	04/21/06	04/19/06	04/19/06	04/20/06
Acenaphthene	<990	850	690	<150	<130	<150	<54	<2,100	<130
Acenaphthylene	<1,700	<2,900	<950	<260	<230	<260	<92	<3,600	<220
Anthracene	<99	380	1,400	90	48	36	<5.4	2,600	<13
Benzo(a)anthracene	870	1,100	4,300	1,400	<13	140	<5.4	3,500	<13
Benzo(a)pyrene	<99	1,000	110	120	<13	120	<5.4	1,800	<13
Benzo(b)fluoranthene	<99	850	150	<15	<13	79	<5.4	1,300	<13
Benzo(g,h,i)perylene	<99	830	100	<15	<13	89	<5.4	830	<13
Benzo(k)fluoranthene	<99	530	97	86	<13	56	<5.4	460	<13
Chrysene	260	940	1,400	140	<13	110	<5.4	2,400	<13
Dibenzo(a,h)anthracene	<150	130	<84	<23	<20	<23	<8.1	<320	<20
Fluoranthene	410	2,600	7,100	400	260	330	<11	12,000	<26
Fluorene	<200	<340	2,100	<31	<27	<31	<11	3,000	<26
Indeno(1,2,3-cd)pyrene	<99	770	68	<15	<13	80	<5.4	660	<13
1-Methylnaphthalene	<600	<1,000	9,900	<92	<81	<93	<33	2,100	<79
2-Methylnaphthalene	<500	1,400	13,000	<76	<67	<77	<27	9,400	<66
Naphthalene	<600	<1,000	2,500	46	<81	<93	<33	2,100	<79
Phenanthrene	190	1,700	5,300	180	110	260	<5.4	13,000	<13
Pyrene	1,000	1,600	4,000	200	56	200	<5.4	5,600	<13
<b>Total PAH Concentrations</b>	<b>2,730</b>	<b>14,680</b>	<b>52,215</b>	<b>2,662</b>	<b>474</b>	<b>1,500</b>	<b>0</b>	<b>60,750</b>	<b>0</b>

All concentrations are in micrograms per kilogram (µg/kg), unless otherwise indicated.

PAH Polycyclic Aromatic Hydrocarbons

**BOLD** Concentration exceeds site specific s. NR 720.19(5)1 Industrial Direct Contact (IND) Residual Contaminant Level (RCL).

Table 4. Comparison of Site-Wide Surface Soil PAH Analytical Results to s. NR 720.19(5)1 Site-Specific Industrial Direct Contact RCLs, Former Meritor Facility, Oshkosh, Wisconsin.

Sample Location	GP-66	GP-67	GP-68	GP-69	GP-70	GP-71	GP-72	GP-73	
Sample ID	GP-66 0-2'	GP-67 0-2'	GP-68 0-2'	GP-69 0-2'	GP-70 0-2'	GP-71 0-2'	GP-72 2-4'	GP-73 0-2'	GP-73 2-4'
Sample Date	04/18/06	04/18/06	04/18/06	04/20/06	04/20/06	04/18/06	04/19/06	04/21/06	04/21/06
Acenaphthene	100	<550	<790	<150	<270	<53	<140	<140	<1,700
Acenaphthylene	<90	<540	<1,300	<260	<450	<90	<230	<230	<3,000
Anthracene	130	86	98	<15	<27	<5.3	16	<14	<170
Benzo(a)anthracene	360	490	540	60	<27	<5.3	56	<14	510
Benzo(a)pyrene	340	480	550	71	<27	<5.3	57	<14	560
Benzo(b)fluoranthene	330	370	450	61	<27	<5.3	43	<14	490
Benzo(g,h,i)perylene	250	510	590	54	<27	<5.3	47	<14	790
Benzo(k)fluoranthene	170	230	310	41	<27	<5.3	29	<14	<170
Chrysene	310	390	410	65	<27	<5.3	47	<14	460
Dibenzo(a,h)anthracene	44	<82	140	<23	<40	<8	<20	<20	<260
Fluoranthene	870	910	990	170	<53	<11	130	<27	1,300
Fluorene	49	55	<160	<31	<53	<11	<27	<27	<350
Indeno(1,2,3-cd)pyrene	260	460	560	66	<27	<5.3	46	<14	440
1-Methylnaphthalene	60	<330	<470	<93	<160	<32	<82	<82	<1,000
2-Methylnaphthalene	380	780	<390	<77	<130	<27	<68	<68	<870
Naphthalene	<32	<330	<470	<93	<160	<32	<82	<82	<1,000
Phenanthrene	540	460	410	110	<27	<5.3	100	<14	770
Pyrene	560	580	640	160	<27	<5.3	85	<14	850
<b>Total PAH Concentrations</b>	4,753	5,801	5,688	858	0	0	656	0	6,170

All concentrations are in micrograms per kilogram (µg/kg), unless otherwise indicated.

PAH Polycyclic Aromatic Hydrocarbons

**BOLD** Concentration exceeds site specific s. NR 720.19(5)1 Industrial Direct Contact (IND) Residual Contaminant Level (RCL).

Table 4. Comparison of Site-Wide Surface Soil PAH Analytical Results to s. NR 720.19(5)1 Site-Specific Industrial Direct Contact RCLs, Former Meritor Facility, Oshkosh, Wisconsin.

Sample Location Sample ID Sample Date	GP-74		GP-75	GP-76	GP-77	GP-78	GP-79	GP-80	GP-81
	GP-74 0-2'	GP-74 2-4'	GP-75 0-2'	GP-76 2-4'	GP-77 2-4'	GP-78 2-4'	GP-79 2-4'	GP-80 0-2'	GP-81 2-4'
	04/21/06	04/21/06	04/21/06	04/19/06	04/18/06	04/18/06	04/18/06	05/03/07	05/03/07
Acenaphthene	<57	<540	170	<280	<4,300	<120	<230	<54	250
Acenaphthylene	<97	<920	<94	<470	<7,300	<210	<390	<91	50
Anthracene	20	390	250	110	5,800	130	46	<5.4	580
Benzo(a)anthracene	79	1,200	440	190	13,000	580	190	<5.4	1,700
Benzo(a)pyrene	65	1,000	400	170	<b>15,000</b>	670	180	<5.4	1,700
Benzo(b)fluoranthene	55	730	290	120	9,800	520	130	<5.4	1,300
Benzo(g,h,i)perylene	51	720	230	120	12,000	600	120	<5.4	990
Benzo(k)fluoranthene	28	500	150	93	7,400	400	90	<5.4	830
Chrysene	59	910	350	180	11,000	520	150	<5.4	1,500
Dibenzo(a,h)anthracene	8.7	140	51	<42	1,800	92	<34	<8.1	200
Fluoranthene	150	3,000	1,000	590	32,000	1,500	500	<11	3,800
Fluorene	<11	240	130	<56	2,900	70	23	<11	110
Indeno(1,2,3-cd)pyrene	51	640	240	120	9,700	540	120	<5.4	1,100
1-Methylnaphthalene	<34	<330	51	<170	<2,600	<74	<140	<32	97
2-Methylnaphthalene	<29	1,300	500	260	14,000	410	<110	<27	520
Naphthalene	<34	400	230	<170	<2,600	<74	<140	<32	470
Phenanthrene	87	2300	850	510	22,000	870	130	<5.4	2,200
Pyrene	87	2100	650	400	23,000	1200	380	<5.4	3,200
<b>Total PAH Concentrations</b>	741	15,570	5,982	2,863	<b>179,400</b>	8,102	2,059	0	20,597

All concentrations are in micrograms per kilogram (µg/kg), unless otherwise indicated.

PAH Polycyclic Aromatic Hydrocarbons

**BOLD** Concentration exceeds site specific s. NR 720.19(5)1 Industrial Direct Contact (IND) Residual Contaminant Level (RCL).

Table 4. Comparison of Site-Wide Surface Soil PAH Analytical Results to s. NR 720.19(5)1 Site-Specific Industrial Direct Contact RCLs, Former Meritor Facility, Oshkosh, Wisconsin.

Sample Location	GP-82	GP-83	GP-84	GP-85	GP-86	GP-87	GP-89	GP-90	GP-91
Sample ID	GP-82 2-4'	GP-83 2-4'	GP-84 2-4'	GP-85 2-4'	GP-86 2-4'	GP-87 0-2'	GP-89 2-4'	GP-90 2-4'	GP-91 2-4'
Sample Date	05/03/07	05/03/07	05/03/07	05/03/07	05/03/07	05/03/07	05/03/07	05/03/07	05/03/07
Acenaphthene	<53	<140	<65	<80	33,000	<460	<75	<82	<130
Acenaphthylene	<90	<230	<110	<140	12,000	<780	<130	<140	<230
Anthracene	<5.3	20	<6.5	<8	100,000	<46	<7.5	<8.2	<13
Benzo(a)anthracene	<5.3	190	<6.5	20	<b>180,000</b>	<46	<7.5	<8.2	24
Benzo(a)pyrene	<5.3	110	<6.5	20	<b>180,000</b>	<46	9.1	<8.2	58
Benzo(b)fluoranthene	<5.3	47	<6.5	16	<b>130,000</b>	<46	12	<8.2	32
Benzo(g,h,i)perylene	<5.3	<14	<6.5	9.7	110,000	<46	<7.5	<8.2	74
Benzo(k)fluoranthene	<5.3	<14	<6.5	9.3	85,000	<46	<7.5	<8.2	29
Chrysene	<5.3	140	<6.5	18	170,000	<46	<7.5	<8.2	34
Dibenzo(a,h)anthracene	<7.9	<20	<9.8	<12	<b>18,000</b>	<69	<11	<12	<20
Fluoranthene	<11	430	<13	44	610,000	<92	18	<16	92
Fluorene	<11	91	<13	<16	87,000	<92	<15	<16	<27
Indeno(1,2,3-cd)pyrene	<5.3	<14	<6.5	14	<b>120,000</b>	<46	<7.5	<8.2	52
1-Methylnaphthalene	<32	<81	<39	<48	40,000	<280	<45	<49	<81
2-Methylnaphthalene	<26	<68	<33	<40	300,000	<230	<38	<41	<67
Naphthalene	<32	<81	<39	<48	<b>92,000</b>	<280	<45	<49	<81
Phenanthrene	<5.3	140	<6.5	19	510,000	<46	11	<8.2	45
Pyrene	<5.3	110	<6.5	29	420,000	<46	14	<8.2	130
<b>Total PAH Concentrations</b>	0	1,278	0	199	<b>3,197,000</b>	0	64	0	570

All concentrations are in micrograms per kilogram (µg/kg), unless otherwise indicated.

PAH Polycyclic Aromatic Hydrocarbons

**BOLD** Concentration exceeds site specific s. NR 720.19(5)1 Industrial Direct Contact (IND) Residual Contaminant Level (RCL).

Table 4. Comparison of Site-Wide Surface Soil PAH Analytical Results to s. NR 720.19(5)1 Site-Specific Industrial Direct Contact RCLs, Former Meritor Facility, Oshkosh, Wisconsin.

Sample Location	GP-92	GP-93	GP-94	GP-95	GP-96	GP-98	GP-99	GP-100
Sample ID	GP-92 2-4'	GP-93 2-4'	GP-94 0-2'	GP-95 2-4'	GP-96 2-4'	GP-98 0-2'	GP-99 2-4'	GP-100 2-4'
Sample Date	05/03/07	05/03/07	05/03/07	05/01/07	05/01/07	05/03/07	05/03/07	05/01/07
Acenaphthene	<64	<73	<82	<53	<280	<200	<250	<85
Acenaphthylene	<110	<120	<140	<90	<470	<340	<430	<140
Anthracene	<6.4	19	86	<5.3	<240	<20	640	<8.5
Benzo(a)anthracene	24	110	1,400	<5.3	<28	64	1,700	<8.5
Benzo(a)pyrene	28	230	270	<5.3	<28	76	1,600	<8.5
Benzo(b)fluoranthene	24	170	120	<5.3	<28	59	930	<8.5
Benzo(g,h,i)perylene	18	200	150	<5.3	<28	82	780	<8.5
Benzo(k)fluoranthene	12	110	<8.2	<5.3	<28	41	720	<8.5
Chrysene	22	120	190	<5.3	<28	53	1,400	<8.5
Dibenzo(a,h)anthracene	<9.6	37	42	<8	<42	<30	180	<13
Fluoranthene	59	210	910	<11	<55	120	3,300	<17
Fluorene	<13	<15	57	<11	97	<40	<50	<17
Indeno(1,2,3-cd)pyrene	20	200	130	<5.3	<28	63	920	<8.5
1-Methylnaphthalene	<38	45	<49	<32	270	<120	<150	<51
2-Methylnaphthalene	<32	89	<41	<27	490	<100	<130	<43
Naphthalene	<38	<44	<49	<53	<560	<120	<150	<51
Phenanthrene	31	70	300	<5.3	440	48	1,400	<8.5
Pyrene	48	120	88	<5.3	<28	100	3,200	<8.5
<b>Total PAH Concentrations</b>	286	1,730	3,743	0	1,297	706	16,770	0

All concentrations are in micrograms per kilogram (µg/kg), unless otherwise indicated.

PAH Polycyclic Aromatic Hydrocarbons

**BOLD** Concentration exceeds site specific s. NR 720.19(5)1 Industrial Direct Contact (IND) Residual Contaminant Level (RCL).

Table 4. Comparison of Site-Wide Surface Soil PAH Analytical Results to s. NR 720.19(5)1 Site-Specific Industrial Direct Contact RCLs, Former Meritor Facility, Oshkosh, Wisconsin.

Sample Location	GP-101	GP-102	GP-103	GP-104	GP-105	GP-106	GP-107	GP-108	GP-109
Sample ID	GP-101 0-2'	GP-102 2-4'	GP-103 2-4'	GP-104 2-4'	GP-105 2-4'	GP-106 0-2'	GP-107 0-2'	GP-108 0-2'	GP-109 2-4'
Sample Date	05/03/07	05/03/07	05/03/07	05/03/07	05/03/07	05/03/07	06/15/09	06/15/09	06/15/09
Acenaphthene	<69	<72	<130	<1,100	<460	<90	<240	<240	<82
Acenaphthylene	<120	<120	<220	<1,800	<790	<150	<400	<400	<140
Anthracene	<6.9	<7.2	25	370	610	<9.0	150	78	12
Benzo(a)anthracene	8.2	7.3	150	1,700	1,900	11	520	270	180
Benzo(a)pyrene	12	52	170	1,900	2,300	25	670	200	44
Benzo(b)fluoranthene	8.2	59	130	1,400	1,800	17	960	500	49
Benzo(g,h,i)perylene	7.6	93	120	1,300	1,300	31	740	220	37
Benzo(k)fluoranthene	<6.9	47	200	970	1,200	<9.0	530	100	85
Chrysene	8.5	16	140	1,700	2,000	19	1200	700	96
Dibenzo(a,h)anthracene	5	17	27	280	280	<14	80	<36	<12
Fluoranthene	26	29	360	4,700	6,200	69	2,300	1,000	160
Fluorene	7	<14	<26	250	460	<18	110	53	130
Indeno(1,2,3-cd)pyrene	9.1	60	120	1,400	1,600	<9.0	900	330	37
1-Methylnaphthalene	<41	<43	130	<640	<280	130	780	270	220
2-Methylnaphthalene	<34	<36	330	<530	<230	<45	2,200	890	250
Naphthalene	<41	71	110	<640	<280	64	780	330	560
Phenanthrene	<6.9	12	180	2,200	3,700	<9.0	1,300	480	120
Pyrene	11	14	580	5,900	4,900	<9.0	2,400	1,300	190
<b>Total PAH Concentrations</b>	<b>103</b>	<b>477</b>	<b>2,772</b>	<b>24,070</b>	<b>28,250</b>	<b>366</b>	<b>15,620</b>	<b>6,721</b>	<b>2,170</b>

All concentrations are in micrograms per kilogram (µg/kg), unless otherwise indicated.

PAH Polycyclic Aromatic Hydrocarbons

**BOLD** Concentration exceeds site specific s. NR 720.19(5)1 Industrial Direct Contact (IND) Residual Contaminant Level (RCL).

Table 4. Comparison of Site-Wide Surface Soil PAH Analytical Results to s. NR 720.19(5)1 Site-Specific Industrial Direct Contact RCLs, Former Meritor Facility, Oshkosh, Wisconsin.

Sample Location	GP-110	GP-111	GP-112	GP-113	GP-115	GP-117	GP-118	GP-119	GP-120	MW-1
Sample ID	GP-110 0-2	GP-111 0-2	GP-112 2-4	GP-113 2-4	GP-115 2-4	GP-117 2-4	GP-118 2-4	GP-119 2-4	GP-120 2-4	MW-1 2-4'
Sample Date	06/15/09	06/15/09	06/15/09	06/15/09	06/18/09	06/18/09	06/19/09	06/19/09	06/19/09	04/28/04
Acenaphthene	<270	<58	<130	310	<380	<56	<260	<53	<57	<61
Acenaphthylene	<450	<98	<220	<230	<640	<96	<450	<90	<97	<100
Anthracene	41	24	110	320	280	46	1,000	22	62	24
Benzo(a)anthracene	<27	130	140	1,200	1,200	160	10,000	490	2,000	208
Benzo(a)pyrene	<27	34	120	1,400	1,200	120	<26	<5.3	<5.7	208
Benzo(b)fluoranthene	<27	79	260	2,100	1,200	380	3,300	310	1,300	171
Benzo(g,h,i)perylene	<27	41	140	1,200	1,100	200	<26	<5.3	<5.7	183
Benzo(k)fluoranthene	<27	17	85	990	640	59	<26	240	430	110
Chrysene	<27	89	370	2,100	2,400	350	15,000	940	480	183
Dibenzo(a,h)anthracene	<40	<8.7	20	160	300	27	<39	<7.9	<8.5	40
Fluoranthene	450	370	1,100	4,900	4,400	590	16,000	260	1,300	465
Fluorene	<53	93	530	730	120	59	2,600	14	29	<12
Indeno(1,2,3-cd)pyrene	<27	26	110	1,300	1,600	220	<26	<5.3	<5.7	171
1-Methylnaphthalene	<160	190	150	530	330	300	3,000	100	84	<37
2-Methylnaphthalene	290	330	640	2,000	1,500	650	4,000	<32	84	183
Naphthalene	<160	150	380	990	690	420	5,100	<32	42	<31
Phenanthrene	180	170	500	1,600	2,600	360	5,500	83	260	159
Pyrene	630	270	1,300	4,900	4,900	640	23,000	320	1,200	452
<b>Total PAH Concentrations</b>	1,591	2,013	5,955	26,730	24,460	4,581	88,500	2,779	7,271	2,557

All concentrations are in micrograms per kilogram (µg/kg), unless otherwise indicated.

PAH Polycyclic Aromatic Hydrocarbons

**BOLD** Concentration exceeds site specific s. NR 720.19(5)1 Industrial Direct Contact (IND) Residual Contaminant Level (RCL).

Table 4. Comparison of Site-Wide Surface Soil PAH Analytical Results to s. NR 720.19(5)1 Site-Specific Industrial Direct Contact RCLs, Former Meritor Facility, Oshkosh, Wisconsin.

Sample Location	MW-3	MW-4	MW-5	MW-7	MW-8	MW-9	MW-12	MW-13	MW-14	MW-15
Sample ID	MW-3 2-4'	MW-4 0-2'	MW-5 2-4'	MW-7 2-4'	MW-8 2-4'	MW-9 2-4'	MW-12 2-4'	MW-13 2-4'	MW-14 2-4'	MW-15 0-2'
Sample Date	04/29/04	04/30/04	05/03/04	05/04/04	05/03/04	04/30/04	05/03/04	05/01/07	05/01/07	04/30/07
Acenaphthene	<57	75	<62	<58	7,970	130	331	<790	<140	<660
Acenaphthylene	<97	<92	<110	<98	500	<110	<260	<1,300	<240	<1,100
Anthracene	<5.7	62	11	58	9,750	156	100	<79	130	82
Benzo(a)anthracene	<5.7	183	50	32	29,700	964	723	330	270	330
Benzo(a)pyrene	<5.7	216	34	<5.8	<b>25,000</b>	938	753	510	270	410
Benzo(b)fluoranthene	<5.7	162	29	8.8	20,200	625	512	380	220	310
Benzo(g,h,i)perylene	<5.7	216	62	<5.8	14,300	742	572	590	240	270
Benzo(k)fluoranthene	<5.7	95	14	<5.8	13,100	430	361	200	150	200
Chrysene	<5.7	183	37	10	30,900	768	663	290	240	320
Dibenzo(a,h)anthracene	<8.6	39	<9.3	<8.7	3,570	143	78	<120	31	<99
Fluoranthene	<11	463	137	324	111,000	1,820	2,020	690	980	820
Fluorene	<11	25	<12	110	14,300	40	69	<160	66	<130
Indeno(1,2,3-cd)pyrene	<5.7	183	50	<5.8	16,600	651	542	410	180	280
1-Methylnaphthalene	<34	51	<37	359	6,420	130	<90	<470	<400	<390
2-Methylnaphthalene	<29	194	<31	683	49,900	781	2,620	<400	<500	<330
Naphthalene	<29	41	<31	706	809	78	<75	<470	<85	<390
Phenanthrene	<5.7	237	73	243	103,000	677	753	410	580	310
Pyrene	<5.7	366	137	336	97,500	2080	2,050	460	600	570
<b>Total PAH Concentrations</b>	0	2,791	634	2,870	<b>554,519</b>	11,153	12,147	4,270	3,957	3,902

All concentrations are in micrograms per kilogram (µg/kg), unless otherwise indicated.

PAH Polycyclic Aromatic Hydrocarbons

**BOLD** Concentration exceeds site specific s. NR 720.19(5)1 Industrial Direct Contact (IND) Residual Contaminant Level (RCL).

Table 4. Comparison of Site-Wide Surface Soil PAH Analytical Results to s. NR 720.19(5)1 Site-Specific Industrial Direct Contact RCLs, Former Meritor Facility, Oshkosh, Wisconsin.

Sample Location	MW-16	MW-17	MW-22	MW-25	RW-4	RW-5	GP-WL-1	GP-WL-2	GP-WL-3	GP-WL-4
Sample ID	MW-16 2-4'	MW-17 2-4'	MW-22 2-4'	MW-25 0-2'	RW-4 2-4'	RW-5 2-4'	GP-WL-1 2-4'	GP-WL-2 2-4'	GP-WL-3 2-4'	GP-WL-4 2-4'
Sample Date	04/30/07	04/30/07	06/17/09	06/17/09	05/03/07	05/03/07	05/03/07	05/03/07	05/03/07	05/03/07
Acenaphthene	<99	<59	<51	<50	<680	<73	<99	<99	<100	<67
Acenaphthylene	<170	<100	<88	<84	<1,200	<120	<170	<170	<160	<120
Anthracene	<9.9	100	<5.1	<5	140	180	61	31	<10	17
Benzo(a)anthracene	63	290	<5.1	24	580	640	190	270	32	69
Benzo(a)pyrene	93	<5.9	<5.1	18	510	620	170	270	39	41
Benzo(b)fluoranthene	67	<5.9	<5.1	18	550	440	120	290	35	41
Benzo(g,h,i)perylene	98	<5.9	<5.1	19	430	350	110	160	28	35
Benzo(k)fluoranthene	53	<5.9	<5.1	9.8	200	250	76	170	21	23
Chrysene	54	140	<5.1	31	480	550	150	250	36	56
Dibenzo(a,h)anthracene	22	<8.9	<7.7	<7.4	<100	72	26	46	<15	<10
Fluoranthene	91	1300	<10	63	1,200	1,500	380	340	96	120
Fluorene	<20	120	<10	<9.9	<140	39	<20	<20	<20	<13
Indeno(1,2,3-cd)pyrene	110	<5.9	<5.1	30	330	380	110	170	30	35
1-Methylnaphthalene	<59	190	<31	<30	<410	<44	<59	110	<61	87
2-Methylnaphthalene	<49	930	<31	<30	<340	320	<49	280	<51	180
Naphthalene	<59	50	<31	<30	<410	160	<59	110	<61	63
Phenanthrene	35	900	5.2	16	500	980	260	190	52	98
Pyrene	30	350	<5.1	81	690	1,600	1,000	280	100	55
<b>Total PAH Concentrations</b>	<b>716</b>	<b>4,370</b>	<b>5</b>	<b>310</b>	<b>5,610</b>	<b>8,081</b>	<b>2,653</b>	<b>2,967</b>	<b>469</b>	<b>920</b>

All concentrations are in micrograms per kilogram (µg/kg), unless otherwise indicated.

PAH Polycyclic Aromatic Hydrocarbons

**BOLD** Concentration exceeds site specific s. NR 720.19(5)1 Industrial Direct Contact (IND) Residual Contaminant Level (RCL).

Table 5. Benzo(a)pyrene Equivalent Assessment of Surface Soils in Accordance with s. NR 720.19(5)2, Former Meritor Facility, Oshkosh, Wisconsin

Sample Location Sample ID Sample Date	BaP <sub>equiv</sub> Relative Potency Factor	GP-29	GP-32	GP-33	GP-44	GP-46	GP-50	GP-51	
		GP-29 2-4'	GP-32 2-4'	GP-33 2-4'	GP-44 0-4'	GP-46 2-4'	GP-50 0-2'	GP-51 0-2'	GP-51 2-4'
		1/14/2002	1/15/2002	1/15/2002	1/16/2002	4/18/2006	4/18/2006	4/18/2006	4/18/2006
Acenaphthene	0.001	9.5	9.5	9	9	26.5	1,100	1,100	175
Acenaphthylene	0.001	18	19	6.5	6.5	45	1,850	1,850	295
Anthracene	0.01	7	24	25	6.5	2.65	110	260	380
Benzo(a)anthracene	0.1	25	120	38	7.5	17	600	1,000	950
Benzo(a)pyrene	1	7	120	50	6.5	26	550	1,100	930
Benzo(b)fluoranthene	0.1	6.5	99	35	6	16	110	370	580
Benzo(g,h,i)perylene	0.01	6.5	88	21	6	16	620	580	590
Benzo(k)fluoranthene	0.01	7.5	120	31	7	21	300	380	440
Chrysene	0.001	56	260	120	7.5	14	270	620	790
Dibenzo(a,h)anthracene	1	6.5	40	6	13	4	165	160	96
Fluoranthene	0.001	6	170	76	5.5	32	1,200	2,200	2,700
Fluorene	0.001	7	31	17	6.5	5.5	215	215	140
Indeno(1,2,3-cd)pyrene	0.1	6.5	82	20	14	16	260	560	580
1-Methylnaphthalene	0.001	8	84	46	7.5	16	650	650	105
2-Methylnaphthalene	0.001	7	120	67	6.5	13.5	550	550	830
Naphthalene	0.001	10	180	35	9	16	650	650	105
Phenanthrene	0.001	6.5	250	140	6	18	670	970	1,400
Pyrene	0.001	170	260	150	6.5	26	350	1,300	1,700
BaP <sub>equiv</sub> (µg/kg)		17.81	193.80	66.74	22.52	35.51	829.81	1,475.31	1,259.34

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Table 5. Benzo(a)pyrene Equivalent Assessment of Surface Soils in Accordance with s. NR 720.19(5)2, Former Meritor Facility, Oshkosh, Wisconsin.

Sample Location Sample ID Sample Date	GP-52		GP-53	GP-57	GP-59	GP-62	GP-63	GP-64	GP-65
	GP-52 0-2' 4/18/2006	GP-52 2-4' 4/18/2006	GP-53 2-4' 4/18/2006	GP-57 0-2' 4/20/2006	GP-59 2-4' 4/20/2006	GP-62 2-4' 4/21/2006	GP-63 2-4' 4/19/2006	GP-64 2-4' 4/19/2006	GP-65 0-2' 4/20/2006
Acenaphthene	495	850	690	75	65	75	27	1,050	65
Acenaphthylene	850	1,450	475	130	115	130	46	1,800	110
Anthracene	49.5	380	1,400	90	48	36	2.7	2,600	6.5
Benzo(a)anthracene	870	1,100	4,300	1,400	6.5	140	2.7	3,500	6.5
Benzo(a)pyrene	49.5	1,000	110	120	6.5	120	2.7	1,800	6.5
Benzo(b)fluoranthene	49.5	850	150	7.5	6.5	79	2.7	1,300	6.5
Benzo(g,h,i)perylene	49.5	830	100	7.5	6.5	89	2.7	830	6.5
Benzo(k)fluoranthene	49.5	530	97	86	6.5	56	2.7	460	6.5
Chrysene	260	940	1,400	140	6.5	110	2.7	2,400	6.5
Dibenzo(a,h)anthracene	75	130	42	11.5	10	11.5	4.05	160	10
Fluoranthene	410	2,600	7,100	400	260	330	5.5	12,000	13
Fluorene	100	170	2,100	15.5	13.5	15.5	5.5	3,000	13
Indeno(1,2,3-cd)pyrene	49.5	770	68	7.5	6.5	80	2.7	660	6.5
1-Methylnaphthalene	300	500	9,900	46	40.5	46.5	16.5	2,100	39.5
2-Methylnaphthalene	250	1,400	13,000	38	33.5	38.5	13.5	9,400	33
Naphthalene	300	500	2,500	46	40.5	46.5	16.5	2,100	39.5
Phenanthrene	190	1,700	5,300	180	110	260	2.7	13,000	6.5
Pyrene	1,000	1,600	4,000	200	56	200	2.7	5,600	6.5
<b>BaP<sub>equiv</sub> (µg/kg)</b>	227.04	<b>1,431.11</b>	666.24	276.11	19.80	164.46	7.78	<b>2597.35</b>	18.98

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Table 5. Benzo(a)pyrene Equivalent Assessment of Surface Soils in Accordance with s. NR 720.19(5)2, Former Meritor Facility, Oshkosh, Wisconsin.

Sample Location	GP-66	GP-67	GP-68	GP-69	GP-70	GP-71	GP-72	GP-73	
Sample ID	GP-66 0-2'	GP-67 0-2'	GP-68 0-2'	GP-69 0-2'	GP-70 0-2'	GP-71 0-2'	GP-72 2-4'	GP-73 0-2'	GP-73 2-4'
Sample Date	4/18/2006	4/18/2006	4/18/2006	4/20/2006	4/20/2006	4/18/2006	4/19/2006	4/21/2006	4/21/2006
Acenaphthene	100	275	395	75	135	26.5	70	70	850
Acenaphthylene	45	470	650	130	225	45	115	115	1,500
Anthracene	130	86	98	7.5	13.5	2.65	16	7	85
Benzo(a)anthracene	360	490	540	60	13.5	2.65	56	7	510
Benzo(a)pyrene	340	480	550	71	13.5	2.65	57	7	560
Benzo(b)fluoranthene	330	370	450	61	13.5	2.65	43	7	490
Benzo(g,h,i)perylene	250	510	590	54	13.5	2.65	47	7	790
Benzo(k)fluoranthene	170	230	310	41	13.5	2.65	29	7	85
Chrysene	310	390	410	65	13.5	2.65	47	7	460
Dibenzo(a,h)anthracene	44	41.5	140	11.5	20	4	10	10	130
Fluoranthene	870	910	990	170	26.5	5.5	130	13.5	1,300
Fluorene	49	55	80	15.5	26.5	5.5	13.5	13.5	175
Indeno(1,2,3-cd)pyrene	260	460	560	66	13.5	2.65	46	7	440
1-Methylnaphthalene	60	165	235	46.5	80	16	41	41	500
2-Methylnaphthalene	380	780	195	38.5	65	13.5	34	34	435
Naphthalene	16	165	235	46.5	80	16	41	41	500
Phenanthrene	540	460	410	110	13.5	2.65	100	7	770
Pyrene	560	580	640	160	13.5	2.65	85	7	850
<b>BaP<sub>equiv</sub> (µg/kg)</b>	<b>487.43</b>	<b>666.01</b>	<b>859.22</b>	<b>103.08</b>	<b>38.63</b>	<b>7.66</b>	<b>83.10</b>	<b>19.66</b>	<b>850.94</b>

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**Table 5. Benzo(a)pyrene Equivalent Assessment of Surface Soils in Accordance with s. NR 720.19(5)2, Former Meritor Facility, Oshkosh, Wisconsin.**

Sample Location	GP-74		GP-75	GP-76	GP-77	GP-78	GP-79	GP-80	GP-81
	GP-74 0-2'	GP-74 2-4'	GP-75 0-2'	GP-76 2-4'	GP-77 2-4'	GP-78 2-4'	GP-79 2-4'	GP-80 0-2'	GP-81 2-4'
Sample ID	4/21/2006	4/21/2006	4/21/2006	4/19/2006	4/18/2006	4/18/2006	4/18/2006	5/3/2007	5/3/2007
Acenaphthene	28.5	270	170	140	2,150	60	115	27	250
Acenaphthylene	48.5	460	47	235	3,650	105	195	45.5	50
Anthracene	20	390	250	110	5,800	130	46	2.7	580
Benzo(a)anthracene	79	1,200	440	190	13,000	580	190	2.7	1,700
Benzo(a)pyrene	65	1,000	400	170	15,000	670	180	2.7	1,700
Benzo(b)fluoranthene	55	730	290	120	9,800	520	130	2.7	1,300
Benzo(g,h,i)perylene	51	720	230	120	12,000	600	120	2.7	990
Benzo(k)fluoranthene	28	500	150	93	7,400	400	90	2.7	830
Chrysene	59	910	350	180	11,000	520	150	2.7	1,500
Dibenzo(a,h)anthracene	8.7	140	51	21	1,800	92	17	4.05	200
Fluoranthene	150	3,000	1,000	590	32,000	1,500	500	5.5	3,800
Fluorene	5.5	240	130	28	2,900	70	23	5.5	110
Indeno(1,2,3-cd)pyrene	51	640	240	120	9,700	540	120	2.7	1,100
1-Methylnaphthalene	17	165	51	85	1,300	37	70	16	97
2-Methylnaphthalene	14.5	1,300	500	260	14,000	410	55	13.5	520
Naphthalene	17	400	230	85	1,300	37	70	16	470
Phenanthrene	87	2300	850	510	22,000	870	130	2.7	2,200
Pyrene	87	2100	650	400	23,000	1200	380	2.7	3,200
<b>BaP<sub>equiv</sub> (µg/kg)</b>	93.70	1,424.25	558.28	239.74	20,415.30	942.11	245.25	7.78	2,346.20

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Table 5. Benzo(a)pyrene Equivalent Assessment of Surface Soils in Accordance with s. NR 720.19(5)2, Former Meritor Facility, Oshkosh, Wisconsin.

Sample Location	GP-82	GP-83	GP-84	GP-85	GP-86	GP-87	GP-89	GP-90	GP-91
Sample ID	GP-82 2-4'	GP-83 2-4'	GP-84 2-4'	GP-85 2-4'	GP-86 2-4'	GP-87 0-2'	GP-89 2-4'	GP-90 2-4'	GP-91 2-4'
Sample Date	5/3/2007	5/3/2007	5/3/2007	5/3/2007	5/3/2007	5/3/2007	5/3/2007	5/3/2007	5/3/2007
Acenaphthene	26.5	70	32.5	40	33,000	230	37.5	41	65
Acenaphthylene	45	115	55	70	12,000	390	65	70	115
Anthracene	2.65	20	3.25	4	100,000	23	3.75	4.1	6.5
Benzo(a)anthracene	2.65	190	3.25	20	180,000	23	3.75	4.1	24
Benzo(a)pyrene	2.65	110	3.25	20	180,000	23	9.1	4.1	58
Benzo(b)fluoranthene	2.65	47	3.25	16	130,000	23	12	4.1	32
Benzo(g,h,i)perylene	2.65	7	3.25	9.7	110,000	23	3.75	4.1	74
Benzo(k)fluoranthene	2.65	7	3.25	9.3	85,000	23	3.75	4.1	29
Chrysene	2.65	140	3.25	18	170,000	23	3.75	4.1	34
Dibenzo(a,h)anthracene	3.95	10	4.9	6	18,000	34.5	5.5	6	10
Fluoranthene	5.5	430	6.5	44	610,000	46	18	8	92
Fluorene	5.5	91	6.5	8	87,000	46	7.5	8	13.5
Indeno(1,2,3-cd)pyrene	2.65	7	3.25	14	120,000	23	3.75	4.1	52
1-Methylnaphthalene	16	40.5	19.5	24	40,000	140	22.5	24.5	40.5
2-Methylnaphthalene	13	34	16.5	20	300,000	115	19	20.5	33.5
Naphthalene	16	40.5	19.5	24	92,000	140	22.5	24.5	40.5
Phenanthrene	2.65	140	3.25	19	510,000	23	11	4.1	45
Pyrene	2.65	110	3.25	29	420,000	23	14	4.1	130
<b>BaP<sub>equiv</sub> (µg/kg)</b>	<b>7.61</b>	<b>145.95</b>	<b>9.39</b>	<b>31.53</b>	<b>246,224</b>	<b>66.27</b>	<b>16.88</b>	<b>11.66</b>	<b>80.50</b>

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Table 5. Benzo(a)pyrene Equivalent Assessment of Surface Soils in Accordance with s. NR 720.19(5)2, Former Meritor Facility, Oshkosh, Wisconsin.

Sample Location	GP-92	GP-93	GP-94	GP-95	GP-96	GP-98	GP-99	GP-100
Sample ID	GP-92 2-4'	GP-93 2-4'	GP-94 0-2'	GP-95 2-4'	GP-96 2-4'	GP-98 0-2'	GP-99 2-4'	GP-100 2-4'
Sample Date	5/3/2007	5/3/2007	5/3/2007	5/1/2007	5/1/2007	5/3/2007	5/3/2007	5/1/2007
Acenaphthene	32	36.5	41	26.5	140	100	125	42.5
Acenaphthylene	55	60	70	45	235	170	215	70
Anthracene	3.2	19	86	2.65	120	10	640	4.25
Benzo(a)anthracene	24	110	1400	2.65	14	64	1,700	4.25
Benzo(a)pyrene	28	230	270	2.65	14	76	1,600	4.25
Benzo(b)fluoranthene	24	170	120	2.65	14	59	930	4.25
Benzo(g,h,i)perylene	18	200	150	2.65	14	82	780	4.25
Benzo(k)fluoranthene	12	110	4.1	2.65	14	41	720	4.25
Chrysene	22	120	190	2.65	14	53	1,400	4.25
Dibenzo(a,h)anthracene	4.8	37	42	4	21	15	180	6.5
Fluoranthene	59	210	910	5.5	27.5	120	3,300	8.5
Fluorene	6.5	7.5	57	5.5	97	20	25	8.5
Indeno(1,2,3-cd)pyrene	20	200	130	2.65	14	63	920	4.25
1-Methylnaphthalene	19	45	24.5	16	270	60	75	25.5
2-Methylnaphthalene	16	89	20.5	13.5	490	50	65	21.5
Naphthalene	19	22	24.5	26.5	280	60	75	25.5
Phenanthrene	31	70	300	2.65	440	48	1,400	4.25
Pyrene	48	120	88	2.65	14	100	3,200	4.25
<b>BaP<sub>equiv</sub> (µg/kg)</b>	40.24	319.07	481.13	7.67	42.69	111.71	2,166.28	12.37

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**Table 5. Benzo(a)pyrene Equivalent Assessment of Surface Soils in Accordance with s. NR 720.19(5)2, Former Meritor Facility, Oshkosh, Wisconsin.**

Sample Location	GP-101	GP-102	GP-103	GP-104	GP-105	GP-106	GP-107	GP-108	GP-109
Sample ID	GP-101 0-2'	GP-102 2-4'	GP-103 2-4'	GP-104 2-4'	GP-105 2-4'	GP-106 0-2'	GP-107 0-2	GP-108 0-2	GP-109 2-4
Sample Date	5/3/2007	5/3/2007	5/3/2007	5/3/2007	5/3/2007	5/3/2007	6/15/2009	6/15/2009	6/15/2009
Acenaphthene	34.5	36	65	550	230	45	120	120	41.5
Acenaphthylene	60	60	110	900	395	75	200	200	70
Anthracene	3.45	3.6	25	370	610	4.5	150	78	12
Benzo(a)anthracene	8.2	7.3	150	1,700	1,900	11	520	270	180
Benzo(a)pyrene	12	52	170	1,900	2,300	25	670	200	44
Benzo(b)fluoranthene	8.2	59	130	1,400	1,800	17	960	500	49
Benzo(g,h,i)perylene	7.6	93	120	1,300	1,300	31	740	220	37
Benzo(k)fluoranthene	3.45	47	200	970	1,200	4.5	530	100	85
Chrysene	8.5	16	140	1,700	2,000	19	1200	700	96
Dibenzo(a,h)anthracene	5	17	27	280	280	7	80	18	6
Fluoranthene	26	29	360	4,700	6,200	69	2,300	1,000	160
Fluorene	7	7	13	250	460	9	110	53	130
Indeno(1,2,3-cd)pyrene	9.1	60	120	1,400	1,600	4.5	900	330	37
1-Methylnaphthalene	20.5	21.5	130	320	140	130	780	270	220
2-Methylnaphthalene	17	18	330	265	115	22.5	2,200	890	250
Naphthalene	20.5	71	110	320	140	64	780	330	560
Phenanthrene	3.45	12	180	2,200	3,700	4.5	1,300	480	120
Pyrene	11	14	580	5,900	4,900	4.5	2,400	1,300	190
<b>BaP<sub>equiv</sub> (µg/kg)</b>	19.90	83.35	242.47	2,673.51	3,159.38	36.09	1,013.59	337.32	79.78

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**Table 5. Benzo(a)pyrene Equivalent Assessment of Surface Soils in Accordance with s. NR 720.19(5)2, Former Meritor Facility, Oshkosh, Wisconsin.**

Sample Location	GP-110	GP-111	GP-112	GP-113	GP-115	GP-117	GP-118	GP-119	GP-120	MW-1
Sample ID	GP-110 0-2	GP-111 0-2	GP-112 2-4	GP-113 2-4	GP-115 2-4	GP-117 2-4	GP-118 2-4	GP-119 2-4	GP-120 2-4	MW-1 2-4'
Sample Date	6/15/2009	6/15/2009	6/15/2009	6/15/2009	6/18/2009	6/18/2009	6/19/2009	6/19/2009	6/19/2009	4/28/2004
Acenaphthene	135	29	65	310	190	28	130	26.5	28.5	30.5
Acenaphthylene	225	49	110	115	320	48	225	45	48.5	50
Anthracene	41	24	110	320	280	46	1,000	22	62	24
Benzo(a)anthracene	13.5	130	140	1,200	1,200	160	10,000	490	2,000	208
Benzo(a)pyrene	13.5	34	120	1,400	1,200	120	13	2.65	2.85	208
Benzo(b)fluoranthene	13.5	79	260	2,100	1,200	380	3,300	310	1,300	171
Benzo(g,h,i)perylene	13.5	41	140	1,200	1,100	200	13	2.65	2.85	183
Benzo(k)fluoranthene	13.5	17	85	990	640	59	13	240	430	110
Chrysene	13.5	89	370	2,100	2,400	350	15,000	940	480	183
Dibenzo(a,h)anthracene	20	4.35	20	160	300	27	19.5	3.95	4.25	40
Fluoranthene	450	370	1,100	4,900	4,400	590	16,000	260	1,300	465
Fluorene	26.5	93	530	730	120	59	2,600	14	29	6
Indeno(1,2,3-cd)pyrene	13.5	26	110	1,300	1,600	220	13	2.65	2.85	171
1-Methylnaphthalene	80	190	150	530	330	300	3,000	100	84	18.5
2-Methylnaphthalene	290	330	640	2,000	1,500	650	4,000	16	84	183
Naphthalene	80	150	380	990	690	420	5,100	16	42	15.5
Phenanthrene	180	170	500	1,600	2,600	360	5,500	83	260	159
Pyrene	630	270	1,300	4,900	4,900	640	23,000	320	1,200	452
<b>BaP<sub>equiv</sub> (µg/kg)</b>	40.34	64.41	199.50	2,063.28	1,937.65	229.50	1,448.62	91.33	345.89	307.73

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Table 5. Benzo(a)pyrene Equivalent Assessment of Surface Soils in Accordance with s. NR 720.19(5)2, Former Meritor Facility, Oshkosh, Wisconsin.

Sample Location	MW-3	MW-4	MW-5	MW-7	MW-8	MW-9	MW-12	MW-13	MW-14	MW-15
Sample ID	MW-3 2-4'	MW-4 0-2'	MW-5 2-4'	MW-7 2-4'	MW-8 2-4'	MW-9 2-4'	MW-12 2-4'	MW-13 2-4'	MW-14 2-4'	MW-15 0-2'
Sample Date	4/29/2004	4/30/2004	5/3/2004	5/4/2004	5/3/2004	4/30/2004	5/3/2004	5/1/2007	5/1/2007	4/30/2007
Acenaphthene	28.5	75	31	29	7,970	130	331	395	70	330
Acenaphthylene	48.5	46	55	49	500	55	130	650	120	550
Anthracene	2.85	62	11	58	9,750	156	100	39.5	130	82
Benzo(a)anthracene	2.85	183	50	32	29,700	964	723	330	270	330
Benzo(a)pyrene	2.85	216	34	2.9	25,000	938	753	510	270	410
Benzo(b)fluoranthene	2.85	162	29	8.8	20,200	625	512	380	220	310
Benzo(g,h,i)perylene	2.85	216	62	2.9	14,300	742	572	590	240	270
Benzo(k)fluoranthene	2.85	95	14	2.9	13,100	430	361	200	150	200
Chrysene	2.85	183	37	10	30,900	768	663	290	240	320
Dibenzo(a,h)anthracene	4.3	39	4.65	4.35	3,570	143	78	60	31	49.5
Fluoranthene	5.5	463	137	324	111,000	1,820	2,020	690	980	820
Fluorene	5.5	25	6	110	14,300	40	69	80	66	65
Indeno(1,2,3-cd)pyrene	2.85	183	50	2.9	16,600	651	542	410	180	280
1-Methylnaphthalene	17	51	18.5	359	6,420	130	45	235	200	195
2-Methylnaphthalene	14.5	194	15.5	683	49,900	781	2,620	200	250	165
Naphthalene	14.5	41	15.5	706	809	78	37.5	235	42.5	195
Phenanthrene	2.85	237	73	243	103,000	677	753	410	580	310
Pyrene	2.85	366	137	336	97,500	2080	2,050	460	600	570
<b>BaP<sub>equiv</sub> (µg/kg)</b>	<b>8.23</b>	<b>313.21</b>	<b>52.95</b>	<b>15.11</b>	<b>36,013.80</b>	<b>1,324.84</b>	<b>1,027.75</b>	<b>693.94</b>	<b>376.35</b>	<b>560.54</b>

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**Table 5. Benzo(a)pyrene Equivalent Assessment of Surface Soils in Accordance with s. NR 720.19(5)2, Former Meritor Facility, Oshkosh, Wisconsin.**

Sample Location	MW-16		MW-17		MW-22		MW-25		RW-4		RW-5		GP-WL-1		GP-WL-2		GP-WL-3		GP-WL-4	
Sample ID	MW-16	2-4'	MW-17	2-4'	MW-22	2-4	MW-25	0-2	RW-4	2-4'	RW-5	2-4'	GP-WL-1	2-4	GP-WL-2	2-4	GP-WL-3	2-4	GP-WL-4	2-4
Sample Date	4/30/2007		4/30/2007		6/17/2009		6/17/2009		5/3/2007		5/3/2007		05/03/07		05/03/07		05/03/07		05/03/07	
Acenaphthene	49.5		29.5		25.5		25		340		36.5		44.5		44.5		50		33.5	
Acenaphthylene	85		50		44		42		600		60		85		85		80		60	
Anthracene	4.95		100		2.55		2.5		140		180		61		31		5		17	
Benzo(a)anthracene	63		290		2.55		24		580		640		190		270		32		69	
Benzo(a)pyrene	93		2.95		2.55		18		510		620		170		270		39		41	
Benzo(b)fluoranthene	67		2.95		2.55		18		550		440		120		290		35		41	
Benzo(g,h,i)perylene	98		2.95		2.55		19		430		350		110		160		28		35	
Benzo(k)fluoranthene	53		2.95		2.55		9.8		200		250		76		170		21		23	
Chrysene	54		140		2.55		31		480		550		150		250		36		56	
Dibenzo(a,h)anthracene	22		4.45		3.85		3.7		50		72		26		46		7.5		5	
Fluoranthene	91		1300		5		63		1,200		1,500		380		340		96		120	
Fluorene	10		120		5		4.95		70		39		10		10		10		6.5	
Indeno(1,2,3-cd)pyrene	110		2.95		2.55		30		330		380		110		170		30		35	
1-Methylnaphthalene	29.5		190		15.5		15		205		22		29.5		110		30.5		87	
2-Methylnaphthalene	24.5		930		15.5		15		170		320		24.5		280		25.5		180	
Naphthalene	29.5		50		15.5		15		205		160		29.5		110		30.5		63	
Phenanthrene	35		900		5.2		16		500		980		260		190		52		98	
Pyrene	30		350		2.55		81		690		1,600		1,000		280		100		55	
<b>BaP<sub>equiv</sub> (µg/kg)</b>	<b>141.00</b>		<b>42.11</b>		<b>7.38</b>		<b>29.52</b>		<b>718.16</b>		<b>851.07</b>		<b>242.48</b>		<b>394.31</b>		<b>57.25</b>		<b>62.01</b>	

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**Table 5. Benzo(a)pyrene Equivalent Assessment of Surface Soils in Accordance with s. NR 720.19(5)2, Former Meritor Facility, Oshkosh, Wisconsin**

BaP <sub>equiv</sub> Minimum (µg/kg)	7.378
BaP <sub>equiv</sub> Maximum (µg/kg)	246,224
BaP <sub>equiv</sub> Median (µg/kg)	179
Sample Count	94
Standard Deviation	25,639
95% Upper Confidence Level	5,183
BaP <sub>equiv</sub> Non-Industrial Ingestion RCL	880 µg/kg
BaP <sub>equiv</sub> Industrial Ingestion RCL	3,900 µg/kg
BaP <sub>equiv</sub>	Calculated benzo(a)pyrene equivalent concentration.
<b>BOLD</b>	Concentration exceeds the BaP <sub>equiv</sub> Industrial Direct Contact RCL of 3,900 µg/kg.
<span style="border: 1px solid black; display: inline-block; width: 100px; height: 15px;"></span>	Concentration exceeds the BaP <sub>equiv</sub> Non-Industrial Direct Contact RCL of 880 µg/kg.
<i>Italic</i>	Concentrations equal to one-half the detection limit were used in the calculations where sample results were reported below laboratory detection limits.
µg/kg	Micrograms per kilogram.

**Table 6. Benzo(a)pyrene Equivalent Residual Contaminant Level Calculations, Former Meritor Facility, Oshkosh, Wisconsin.**

**Risk-Based Algorithms for Soil Ingestion.**

The default exposure factors used for direct ingestion of contaminated soil are those specified in s. NR 720.19(5), Wis. Adm. Code. The value for non-industrial and industrial exposure are the same as the default values used by U.S. EPA in the soil screening in level methodology (U.S. EPA 1996). (1)

**Algorithm for Ingestion of Carcinogenic Contaminants in Non-Industrial Soil**

Target Cancer Risk Level, TR (unitless)	1.00E-07		
Combined Target Cancer Risk Level for <i>in situ</i> contaminated soil	1.00E-05	Average Body Weight from, Age 1-6, BWc (kg)	15
Averaging Time, AT (yr)	70	Ingestion Rate of Soil Age 7-31, IRa (mg/d)	100
Exposure Frequency, EF (d/yr)	350	Exposure Duration from Age 7-31, EDa (yr)	24
Age-adjusted Soil Ingestion Factor, IFs (mg*yr/kg*d)	34	Average Adult Body Weight, BWa (kg)	70
Ingestion Rate of Soil Age 1-6, IRc (mg/d)	200		

**Benzo(a)pyrene equivalent concentration - RCL ingestion, all PAHs detected, non-industrial**

$$RCL = \frac{TR \times AT \times 365 \text{ day/year}}{SFo \times 10^{-6} \text{ kg/mg} \times EF \times IFs}$$

$$RCL = \frac{(1 \times 10^{-5}) \times 70 \times 365}{(7.3 \times 10^{-6}) \times 350 \times 114} = \frac{0.2555}{0.29127} = 0.88 \text{ mg/kg or } 880 \text{ } \mu\text{g/kg}$$

**Algorithm for Ingestion of Carcinogenic Contaminants in Industrial Soil**

Target Cancer Risk Level, TR (unitless)	1.00E-06	Exposure Duration, ED (yr)	25
Combined Target Cancer Risk Level for <i>in situ</i> contaminated soil	1.00E-05	Average Adult Body Weight, BWa (kg)	70
Averaging Time, AT (yr)	70		
Exposure Frequency, EF (d/yr)	250		
Ingestion Rate of Soil for Adult, IRa (mg/d)	100		

**Benzo(a)pyrene equivalent concentration - RCL ingestion, all PAHs detected, industrial**

$$RCL = \frac{TR \times BWa \times AT \times 365 \text{ day/year}}{SFo \times 10^{-6} \text{ kg/mg} \times EF \times ED \times IRa}$$

$$RCL = \frac{(1 \times 10^{-5}) \times 70 \times 70 \times 70 \times 365}{(7.3 \times 10^{-6}) \times 250 \times 25 \times 100} = \frac{17.885}{4.5625} = 3.9 \text{ mg/kg or } 3,900 \text{ } \mu\text{g/kg}$$

Table 7. Summary of Site-Wide Groundwater Analytical Results and Comparison to WDNR Criteria, Former Meritor Facility, Oshkosh, Wisconsin.

Name Sample Date	ES	PAL	EW-1						MW-1	
			06/16/04	05/04/06	08/14/06	02/14/07	05/09/07	01/14/10	06/16/04	05/05/06
<b>VOC</b>										
Benzene	5	0.5	<0.20	<0.20	<0.20	<0.25	NA	<0.20	<0.20	<1.0
1,2-Dichloroethane	5	0.5	<0.50	NA	NA	NA	NA	<0.50	<0.50	NA
Ethylbenzene	700	140	9.8	<0.50	<0.50	<0.22	NA	<0.50	<0.50	<2.5
Isopropylbenzene	--	--	<0.20	NA	NA	NA	NA	<0.20	<0.20	NA
Naphthalene	100	10	0.39	<0.25	0.32	NA	NA	<0.25	<0.25	<1.2
n-Propylbenzene	--	--	<0.50	NA	NA	NA	NA	<0.20	<0.50	NA
p-Isopropyltoluene	--	--	<0.20	NA	NA	NA	NA	<0.20	<0.20	NA
sec-Butylbenzene	--	--	<0.25	NA	NA	NA	NA	<0.25	<0.25	NA
Toluene	1,000	200	0.26	<0.20	<0.20	0.14 J	NA	<0.20	<0.20	<1.0
1,2,4-Trimethylbenzene	--	--	<0.20	<0.20	0.31	<0.25	NA	<0.20	<0.20	<1.0
1,3,5-Trimethylbenzene	--	--	<0.20	<0.20	<0.20	0.74	NA	<0.20	<0.20	<1.0
Trimethylbenzenes (Total)	480	96	<0.4	<0.4	0.31	0.74	NA	<0.4	<0.4	<2
Xylenes, Total	10,000	1,000	44	6.9	9	5.1	NA	<0.50	<0.50	<2.5
<b>PAH</b>										
Acenaphthene	--	--	<0.58	NA	NA	NA	NA	<0.33	<0.60	NA
Anthracene	3,000	600	0.22	NA	NA	NA	NA	0.049 J	<0.035	NA
Benzo (a) anthracene	--	--	<0.056	NA	NA	NA	NA	0.12 J	<0.058	NA
Benzo (a) pyrene	--	--	<0.033	NA	NA	NA	NA	<0.032	<0.034	NA
Benzo (k) fluoranthene	--	--	<0.059	NA	NA	NA	NA	<0.046	<0.061	NA
Chrysene	0.2	0.02	<0.049	NA	NA	NA	NA	<0.041	<0.050	NA
Fluoranthene	400	80	0.11	NA	NA	NA	NA	0.43	0.17	NA
Fluorene	400	80	0.26	NA	NA	NA	NA	0.19 J	<0.066	NA
1-Methylnaphthalene	--	--	<0.44	NA	NA	NA	NA	<0.32	<0.45	NA
2-Methylnaphthalene	--	--	0.74	NA	NA	NA	NA	<0.31	<0.31	NA
Naphthalene	100	10	0.29	NA	NA	NA	NA	<0.40	<0.27	NA
Phenanthrene	--	--	0.62	NA	NA	NA	NA	0.42	0.032	NA
Pyrene	250	50	0.048	NA	NA	NA	NA	<0.044	0.055	NA

Footnotes on Page 2.

**Table 7. Summary of Site-Wide Groundwater Analytical Results and Comparison to WDNR Criteria, Former Meritor Facility, Oshkosh, Wisconsin.**

Name Sample Date	ES	PAL	EW-1						MW-1	
			06/16/04	05/04/06	08/14/06	02/14/07	05/09/07	01/14/10	06/16/04	05/05/06
<b>Metals</b>										
Arsenic	10	1	<25	<b>16</b>	<b>14.8</b>	NA	<b>16</b>	NA	<25	<b>32</b>
Barium	2,000	400	200	200	220	NA	190	NA	600	450
Cadmium	5	0.5	<b>2.5</b>	<0.14	<0.14	NA	<0.14	NA	<b>8.6</b>	<0.14
Chromium	100	10	NA	NA	1.1	NA	<2.1	NA	NA	NA
Lead	15	1.5	<13	<1.4	NA	NA	<1.4	NA	<13	<1.4

Note: Only compounds detected in one or more samples are in table. For a complete list, refer to the laboratory report.

Note: All concentrations are reported in micrograms per liter (µg/L).

<b>BOLD</b>	Value exceeds the ES.
	Value exceeds the PAL.
ES	NR 140 Enforcement standard.
J	Sample concentration is less than the practical quantitation limit.
M8	MS and/or MSD were below the acceptance limits.
NA	Not analyzed.
PAL	NR 140 Preventive action limit.
PAHs	Polynuclear-aromatic hydrocarbons.
Q	Concentration between limit of detection and limit of quantitation.
VOCs	Volatile organic compounds.
WDNR	Wisconsin Department of Natural Resources.

Table 7. Summary of Site-Wide Groundwater Analytical Results and Comparison to WDNR Criteria, Former Meritor Facility, Oshkosh, Wisconsin.

Name	ES	PAL	MW-1 (continued)			MW-2					
			08/14/06	02/14/07	05/09/07	06/16/04	09/29/04	05/05/06	08/16/06	02/14/07	05/09/07
<b>VOC</b>											
Benzene	5	0.5	<0.20	<0.25	NA	<0.20	<0.20	<0.20	<0.20	<0.25	NA
1,2-Dichloroethane	5	0.5	NA	NA	NA	<0.50	<0.50	NA	NA	NA	NA
Ethylbenzene	700	140	<0.50	<0.22	NA	<0.50	<0.50	<0.50	<0.50	<0.22	NA
Isopropylbenzene	--	--	NA	NA	NA	<0.20	<0.20	NA	NA	NA	NA
Naphthalene	100	10	<0.25	NA	NA	<0.25	<0.25	<0.25	<0.25	NA	NA
n-Propylbenzene	--	--	NA	NA	NA	<0.50	<0.50	NA	NA	NA	NA
p-Isopropyltoluene	--	--	NA	NA	NA	<0.20	<0.20	NA	NA	NA	NA
sec-Butylbenzene	--	--	NA	NA	NA	<0.25	<0.25	NA	NA	NA	NA
Toluene	1,000	200	<0.20	<0.11	NA	0.27	<0.20	<0.20	<0.20	0.20 J	NA
1,2,4-Trimethylbenzene	--	--	<0.20	<0.25	NA	<0.20	<0.20	<0.20	0.2	<0.25	NA
1,3,5-Trimethylbenzene	--	--	<0.20	0.29 J	NA	<0.20	<0.20	<0.20	<0.20	0.29 J	NA
Trimethylbenzenes (Total)	480	96	<0.4	<0.25	NA	<0.4	<0.4	<0.4	<0.2	0.29 J	NA
Xylenes, Total	10,000	1,000	<0.50	<0.39	NA	<0.50	<0.50	<0.50	<0.50	0.42 J	NA
<b>PAH</b>											
Acenaphthene	--	--	NA	NA	NA	<0.66	<0.33	NA	NA	NA	NA
Anthracene	3,000	600	NA	NA	NA	<0.039	<0.038	NA	NA	NA	NA
Benzo (a) anthracene	--	--	NA	NA	NA	<0.064	<0.044	NA	NA	NA	NA
Benzo (a) pyrene	--	--	NA	NA	NA	<0.038	<0.032	NA	NA	NA	NA
Benzo (k) fluoranthene	--	--	NA	NA	NA	<0.064	<0.046	NA	NA	NA	NA
Chrysene	0.2	0.02	NA	NA	NA	<0.056	<0.041	NA	NA	NA	NA
Fluoranthene	400	80	NA	NA	NA	<0.027	<0.081	NA	NA	NA	NA
Fluorene	400	80	NA	NA	NA	<0.073	<0.062	NA	NA	NA	NA
1-Methylnaphthalene	--	--	NA	NA	NA	<0.50	<0.32	NA	NA	NA	NA
2-Methylnaphthalene	--	--	NA	NA	NA	<0.34	<0.31	NA	NA	NA	NA
Naphthalene	100	10	NA	NA	NA	<0.30	<0.40	NA	NA	NA	NA
Phenanthrene	--	--	NA	NA	NA	<0.023	<0.030	NA	NA	NA	NA
Pyrene	250	50	NA	NA	NA	0.065	<0.044	NA	NA	NA	NA

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**Table 7. Summary of Site-Wide Groundwater Analytical Results and Comparison to WDNR Criteria, Former Meritor Facility, Oshkosh, Wisconsin.**

Name	ES	PAL	MW-1 (continued)			MW-2					
			08/14/06	02/14/07	05/09/07	06/16/04	09/29/04	05/05/06	08/16/06	02/14/07	05/09/07
<b>Metals</b>											
Arsenic	10	1	<b>46</b>	NA	<b>21</b>	<25	<0.79	<b>7.4</b>	<b>9.18</b>	<b>12</b>	<b>8.9</b>
Barium	2,000	400	190	NA	210	310	220	210	240	210	220
Cadmium	5	0.5	<0.14	NA	<0.14	<b>3.1</b>	<0.14	<0.14	<0.14	<0.14	<0.14
Chromium	100	10	0.74	NA	3.6 J	NA	NA	NA	0.73	NA	3.4 J
Lead	15	1.5	NA	NA	<1.4	<13	<1.4	<1.4	NA	<1.4	<1.4

Note: Only compounds detected in one or more samples are in table. For a complete list, refer to the laboratory report.

Note: All concentrations are reported in micrograms per liter (µg/L).

<b>BOLD</b>	Value exceeds the ES.
	Value exceeds the PAL.
ES	NR 140 Enforcement standard.
J	Sample concentration is less than the practical quantitation limit.
M8	MS and/or MSD were below the acceptance limits.
NA	Not analyzed.
PAL	NR 140 Preventive action limit.
PAHs	Polynuclear-aromatic hydrocarbons.
Q	Concentration between limit of detection and limit of quantitation.
VOCs	Volatile organic compounds.
WDNR	Wisconsin Department of Natural Resources.

Table 7. Summary of Site-Wide Groundwater Analytical Results and Comparison to WDNR Criteria, Former Meritor Facility, Oshkosh, Wisconsin.

Name	ES	PAL	MW-3							MW-4	
			06/15/04	09/29/04	05/04/06	08/16/06	02/13/07	05/09/07	06/23/09	06/15/04	09/28/04
<b>VOC</b>											
Benzene	5	0.5	<0.20	<0.20	<1.0	<0.20	<0.25	NA	NA	<0.20	<0.20
1,2-Dichloroethane	5	0.5	<0.50	<0.50	NA	NA	NA	NA	NA	<0.50	<0.50
Ethylbenzene	700	140	<0.50	<0.50	<2.5	<0.50	<0.22	NA	NA	<0.50	<0.50
Isopropylbenzene	--	--	<0.20	<0.20	NA	NA	NA	NA	NA	<0.20	<0.20
Naphthalene	100	10	<0.25	<0.25	<1.2	<0.25	NA	NA	NA	<0.25	<0.25
n-Propylbenzene	--	--	<0.50	<0.50	NA	NA	NA	NA	NA	<0.50	<0.50
p-Isopropyltoluene	--	--	<0.20	<0.20	NA	NA	NA	NA	NA	<0.20	<0.20
sec-Butylbenzene	--	--	<0.25	<0.25	NA	NA	NA	NA	NA	<0.25	<0.25
Toluene	1,000	200	<0.20	<0.20	<1.0	<0.20	0.18 J	NA	NA	<0.20	<0.20
1,2,4-Trimethylbenzene	--	--	<0.20	<0.20	<1.0	<0.20	<0.25	NA	NA	<0.20	<0.20
1,3,5-Trimethylbenzene	--	--	<0.20	<0.20	<1.0	<0.20	<0.19	NA	NA	<0.20	<0.20
Trimethylbenzenes (Total)	480	96	<0.4	<0.4	<2	<0.4	<0.44	NA	NA	<0.4	<0.4
Xylenes, Total	10,000	1,000	<0.50	<0.50	<2.5	<0.50	<0.39	NA	NA	<0.50	<0.50
<b>PAH</b>											
Acenaphthene	--	--	<0.65	<0.35	NA	NA	NA	<0.35 M8	<0.33	<0.58	<0.34
Anthracene	3,000	600	<0.038	<0.040	NA	NA	NA	<0.041 M8	<0.038	<0.034	<0.039
Benzo (a) anthracene	--	--	<0.063	<0.046	NA	NA	NA	<0.047	<0.044	<0.056	<0.045
Benzo (a) pyrene	--	--	<0.037	<0.034	NA	NA	NA	<0.034	<0.032	<0.033	<0.033
Benzo (k) fluoranthene	--	--	<0.047	<0.048	NA	NA	NA	<0.049	<0.046	<0.042	<0.047
Chrysene	0.2	0.02	<0.055	<0.043	NA	NA	NA	<0.044	<0.041	<0.049	<0.042
Fluoranthene	400	80	<0.027	<0.085	NA	NA	NA	<0.087	<0.083	<0.024	<0.083
Fluorene	400	80	<0.072	<0.065	NA	NA	NA	<0.067 M8	0.094 J	<0.064	<0.063
1-Methylnaphthalene	--	--	<0.49	<0.34	NA	NA	NA	<0.34 M8	<0.32	<0.44	<0.33
2-Methylnaphthalene	--	--	<0.34	<0.33	NA	NA	NA	<0.33 M8	<0.31	<0.30	<0.32
Naphthalene	100	10	<0.29	<0.42	NA	NA	NA	<0.43 M8	<0.40	<0.26	<0.41
Phenanthrene	--	--	<0.022	<0.032	NA	NA	NA	<0.032	0.15	<0.020	<0.031
Pyrene	250	50	<0.045	<0.046	NA	NA	NA	<0.047	<0.044	<0.040	<0.045

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Table 7. Summary of Site-Wide Groundwater Analytical Results and Comparison to WDNR Criteria, Former Meritor Facility, Oshkosh, Wisconsin.

Name	ES	PAL	MW-3							MW-4	
			06/15/04	09/29/04	05/04/06	08/16/06	02/13/07	05/09/07	06/23/09	06/15/04	09/28/04
<b>Metals</b>											
Arsenic	10	1	<25	<0.79	2 J	3.29	3.7	<1	NA	<25	1.2
Barium	2,000	400	170	100	100	100	96	73	NA	610	340
Cadmium	5	0.5	2.4	<0.14	<0.14	1.9	0.15 J	<0.14	NA	6.8	<0.14
Chromium	100	10	NA	NA	NA	0.61 J	NA	3.2 J	NA	NA	NA
Lead	15	1.5	<13	<1.4	<1.4	NA	<1.4	<1.4	NA	<13	<1.4

Note: Only compounds detected in one or more samples are in table. For a complete list, refer to the laboratory report.

Note: All concentrations are reported in micrograms per liter (µg/L).

<b>BOLD</b>	Value exceeds the ES.
	Value exceeds the PAL.
ES	NR 140 Enforcement standard.
J	Sample concentration is less than the practical quantitation limit.
M8	MS and/or MSD were below the acceptance limits.
NA	Not analyzed.
PAL	NR 140 Preventive action limit.
PAHs	Polynuclear-aromatic hydrocarbons.
Q	Concentration between limit of detection and limit of quantitation.
VOCs	Volatile organic compounds.
WDNR	Wisconsin Department of Natural Resources.

Table 7. Summary of Site-Wide Groundwater Analytical Results and Comparison to WDNR Criteria, Former Meritor Facility, Oshkosh, Wisconsin.

Name	ES	PAL	MW-4 (continued)			MW-5			MW-6		
			05/04/06	08/14/06	02/14/07	06/15/04	09/29/04	05/04/06	08/14/06	02/14/07	06/15/04
<b>VOC</b>											
Benzene	5	0.5	<1.0	<0.20	<0.25	<0.20	<0.20	<1.0	<0.20	<0.50	<0.20
1,2-Dichloroethane	5	0.5	NA	NA	NA	<0.50	<0.50	NA	NA	NA	<0.50
Ethylbenzene	700	140	<2.5	<0.50	<0.22	<0.50	<0.50	<2.5	<0.50	<0.44	<0.50
Isopropylbenzene	--	--	NA	NA	NA	<0.20	<0.20	NA	NA	NA	<0.20
Naphthalene	100	10	<1.2	<0.25	NA	<0.25	<0.25	<1.2	<0.25	NA	<0.25
n-Propylbenzene	--	--	NA	NA	NA	<0.50	<0.50	NA	NA	NA	<0.50
p-Isopropyltoluene	--	--	NA	NA	NA	<0.20	<0.20	NA	NA	NA	<0.20
sec-Butylbenzene	--	--	NA	NA	NA	<0.25	<0.25	NA	NA	NA	<0.25
Toluene	1,000	200	<1.0	<0.20	<0.11	<0.20	<0.20	<1.0	<0.20	<0.22	<0.20
1,2,4-Trimethylbenzene	--	--	<1.0	<0.20	<0.25	<0.20	<0.20	<1.0	0.21	<0.50	<0.20
1,3,5-Trimethylbenzene	--	--	<1.0	<0.20	<0.19	<0.20	<0.20	<1.0	<0.20	<0.38	<0.20
Trimethylbenzenes (Total)	480	96	<2	<0.4	<0.44	<0.4	<0.4	<2	<0.2	<0.88	<0.4
Xylenes, Total	10,000	1,000	<2.5	<0.50	<0.39	<0.50	<0.50	<2.5	<0.50	<0.78	<0.50
<b>PAH</b>											
Acenaphthene	--	--	NA	NA	NA	<0.64	<0.33	NA	NA	NA	<0.65
Anthracene	3,000	600	NA	NA	NA	<0.038	<0.038	NA	NA	NA	<0.038
Benzo (a) anthracene	--	--	NA	NA	NA	<0.062	<0.044	NA	NA	NA	<0.063
Benzo (a) pyrene	--	--	NA	NA	NA	<0.037	<0.032	NA	NA	NA	<0.037
Benzo (k) fluoranthene	--	--	NA	NA	NA	<0.046	<0.046	NA	NA	NA	<0.047
Chrysene	0.2	0.02	NA	NA	NA	<0.054	<0.041	NA	NA	NA	<0.055
Fluoranthene	400	80	NA	NA	NA	<0.027	<0.081	NA	NA	NA	<0.027
Fluorene	400	80	NA	NA	NA	<0.071	<0.062	NA	NA	NA	<0.072
1-Methylnaphthalene	--	--	NA	NA	NA	<0.49	<0.32	NA	NA	NA	<0.49
2-Methylnaphthalene	--	--	NA	NA	NA	<0.33	<0.31	NA	NA	NA	<0.34
Naphthalene	100	10	NA	NA	NA	<0.29	<0.40	NA	NA	NA	<0.29
Phenanthrene	--	--	NA	NA	NA	<0.022	<0.030	NA	NA	NA	<0.022
Pyrene	250	50	NA	NA	NA	<0.044	<0.044	NA	NA	NA	<0.045

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**Table 7. Summary of Site-Wide Groundwater Analytical Results and Comparison to WDNR Criteria, Former Meritor Facility, Oshkosh, Wisconsin.**

Name	ES	PAL	MW-4 (continued)			MW-5			MW-6		
			05/04/06	08/14/06	02/14/07	06/15/04	09/29/04	05/04/06	08/14/06	02/14/07	06/15/04
<b>Metals</b>											
Arsenic	10	1	<0.79	3.47	2.1 J	<25	<0.79	<0.79	<0.42	4.7	<25
Barium	2,000	400	410	390	250	180	380	380	370	350	260
Cadmium	5	0.5	0.17 J	<0.14	<0.14	10	<0.14	150	<0.14	0.19 J	3.4
Chromium	100	10	NA	1.6	NA	NA	NA	NA	1.6	NA	NA
Lead	15	1.5	<1.4	NA	<1.4	<13	<1.4	<1.4	NA	<1.4	<13

Note: Only compounds detected in one or more samples are in table. For a complete list, refer to the laboratory report.

Note: All concentrations are reported in micrograms per liter (µg/L).

<b>BOLD</b>	Value exceeds the ES.
	Value exceeds the PAL.
ES	NR 140 Enforcement standard.
J	Sample concentration is less than the practical quantitation limit.
M8	MS and/or MSD were below the acceptance limits.
NA	Not analyzed.
PAL	NR 140 Preventive action limit.
PAHs	Polynuclear-aromatic hydrocarbons.
Q	Concentration between limit of detection and limit of quantitation.
VOCs	Volatile organic compounds.
WDNR	Wisconsin Department of Natural Resources.

**Table 7. Summary of Site-Wide Groundwater Analytical Results and Comparison to WDNR Criteria, Former Meritor Facility, Oshkosh, Wisconsin.**

Name	ES	PAL	MW-6 (continued)				MW-7	DUP-06-15	DUP-06-16	Dup-99	MW-7
			09/29/04	05/02/06	08/14/06	02/14/07	06/15/04	06/15/04	06/16/04	02/15/07	06/16/04
<b>VOC</b>											
Benzene	5	0.5	<0.20	<1.0	<0.20	<0.25	<0.20	<0.20	NA	<0.25	NA
1,2-Dichloroethane	5	0.5	<0.50	NA	NA	NA	<0.50	<0.50	NA	NA	NA
Ethylbenzene	700	140	<0.50	<2.5	<0.50	<0.22	<0.50	<0.50	NA	<0.22	NA
Isopropylbenzene	--	--	<0.20	NA	NA	NA	<0.20	<0.20	NA	NA	NA
Naphthalene	100	10	<0.25	<1.2	<0.25	NA	<0.25	<0.25	NA	NA	NA
n-Propylbenzene	--	--	<0.50	NA	NA	NA	<0.50	<0.50	NA	NA	NA
p-Isopropyltoluene	--	--	<0.20	NA	NA	NA	<0.20	<0.20	NA	NA	NA
sec-Butylbenzene	--	--	<0.25	NA	NA	NA	<0.25	<0.25	NA	NA	NA
Toluene	1,000	200	<0.20	<1.0	<0.20	<0.11	<0.20	<0.20	NA	<0.11	NA
1,2,4-Trimethylbenzene	--	--	<0.20	<1.0	<0.20	<0.25	<0.20	<0.20	NA	<0.25	NA
1,3,5-Trimethylbenzene	--	--	<0.20	<1.0	<0.20	<0.19	<0.20	<0.20	NA	<0.19	NA
Trimethylbenzenes (Total)	480	96	<0.4	<2	<0.4	<0.44	<0.4	<0.4	NA	<0.44	NA
Xylenes, Total	10,000	1,000	<0.50	<2.5	<0.50	<0.39	<0.50	<0.50	NA	<0.39	NA
<b>PAH</b>											
Acenaphthene	--	--	<0.34	NA	NA	NA	<0.66	<0.61	NA	NA	NA
Anthracene	3,000	600	<0.039	NA	NA	NA	<0.039	<0.036	NA	NA	NA
Benzo (a) anthracene	--	--	<0.045	NA	NA	NA	<0.064	<0.059	NA	NA	NA
Benzo (a) pyrene	--	--	<0.033	NA	NA	NA	<0.038	<0.035	NA	NA	NA
Benzo (k) fluoranthene	--	--	<0.047	NA	NA	NA	<0.048	<0.044	NA	NA	NA
Chrysene	0.2	0.02	<0.042	NA	NA	NA	<0.056	<0.052	NA	NA	NA
Fluoranthene	400	80	<0.083	NA	NA	NA	<0.027	<0.025	NA	NA	NA
Fluorene	400	80	<0.063	NA	NA	NA	<0.073	<0.068	NA	NA	NA
1-Methylnaphthalene	--	--	<0.33	NA	NA	NA	<0.50	<0.47	NA	NA	NA
2-Methylnaphthalene	--	--	<0.32	NA	NA	NA	<0.34	<0.32	NA	NA	NA
Naphthalene	100	10	<0.41	NA	NA	NA	<0.30	<0.28	NA	NA	NA
Phenanthrene	--	--	<0.031	NA	NA	NA	<0.023	<0.021	NA	NA	NA
Pyrene	250	50	<0.045	NA	NA	NA	<0.046	<0.042	NA	NA	NA

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**Table 7. Summary of Site-Wide Groundwater Analytical Results and Comparison to WDNR Criteria, Former Meritor Facility, Oshkosh, Wisconsin.**

Name Sample Date	ES	PAL	MW-6 (continued)				MW-7	DUP-06-15	DUP-06-16	Dup-99	MW-7
			09/29/04	05/02/06	08/14/06	02/14/07	06/15/04	06/15/04	06/16/04	02/15/07	06/16/04
<b>Metals</b>											
Arsenic	10	1	<0.79	<0.79	<0.42	<1	NA	NA	<25	NA	<25
Barium	2,000	400	280	230	260	240	NA	NA	200	NA	170
Cadmium	5	0.5	<0.14	0.18 J	<0.14	0.19 J	NA	NA	3.5	NA	<1.1
Chromium	100	10	NA	NA	1.2	NA	NA	NA	NA	NA	NA
Lead	15	1.5	<1.4	<1.4	NA	<1.4	NA	NA	<13	NA	<13

Note: Only compounds detected in one or more samples are in table. For a complete list, refer to the laboratory report.

Note: All concentrations are reported in micrograms per liter (µg/L).

<b>BOLD</b>	Value exceeds the ES.
.	Value exceeds the PAL.
ES	NR 140 Enforcement standard.
J	Sample concentration is less than the practical quantitation limit.
M8	MS and/or MSD were below the acceptance limits.
NA	Not analyzed.
PAL	NR 140 Preventive action limit.
PAHs	Polynuclear-aromatic hydrocarbons.
Q	Concentration between limit of detection and limit of quantitation.
VOCs	Volatile organic compounds.
WDNR	Wisconsin Department of Natural Resources.

Table 7. Summary of Site-Wide Groundwater Analytical Results and Comparison to WDNR Criteria, Former Meritor Facility, Oshkosh, Wisconsin.

Name	ES	PAL	MW-7	MW-99	MW-7	DUP-99	MW-7 (continued)		MW-9		
			09/28/04	09/28/04	05/03/06	05/03/06	08/14/06	02/15/07	06/15/04	09/27/04	05/03/06
<b>VOC</b>											
Benzene	5	0.5	<0.20	<0.20	<0.20	<0.20	<0.20	<0.25	<0.20	<0.20	<1.0
1,2-Dichloroethane	5	0.5	<0.50	<0.50	NA	NA	NA	NA	<0.50	<0.50	NA
Ethylbenzene	700	140	<0.50	<0.50	<0.50	<0.50	<0.50	<0.22	<0.50	<0.50	<2.5
Isopropylbenzene	--	--	<0.20	<0.20	NA	NA	NA	NA	<0.20	<0.20	NA
Naphthalene	100	10	<0.25	<0.25	<0.25	<0.25	<0.25	NA	<0.25	<0.25	<1.2
n-Propylbenzene	--	--	<0.50	<0.50	NA	NA	NA	NA	<0.50	<0.50	NA
p-Isopropyltoluene	--	--	<0.20	<0.20	NA	NA	NA	NA	<0.20	<0.20	NA
sec-Butylbenzene	--	--	<0.25	<0.25	NA	NA	NA	NA	<0.25	<0.25	NA
Toluene	1,000	200	<0.20	<0.20	<0.20	<0.20	<0.20	<0.11	<0.20	<0.20	<1.0
1,2,4-Trimethylbenzene	--	--	<0.20	<0.20	<0.20	<0.20	<0.20	<0.25	<0.20	<0.20	<1.0
1,3,5-Trimethylbenzene	--	--	<0.20	<0.20	<0.20	<0.20	<0.20	<0.19	<0.20	<0.20	<1.0
Trimethylbenzenes (Total)	480	96	<0.4	<0.4	<0.4	<0.4	<0.4	<0.44	<0.4	<0.4	<2
Xylenes, Total	10,000	1,000	<0.50	<0.50	<0.50	<0.50	<0.50	<0.39	<0.50	<0.50	<2.5
<b>PAH</b>											
Acenaphthene	--	--	<0.33	<0.34	NA	NA	NA	NA	<0.58	<0.82	NA
Anthracene	3,000	600	<0.038	<0.039	NA	NA	NA	NA	<0.034	<0.095	NA
Benzo (a) anthracene	--	--	<0.044	<0.045	NA	NA	NA	NA	<0.056	<0.11	NA
Benzo (a) pyrene	--	--	<0.032	<0.033	NA	NA	NA	NA	<0.033	<0.080	NA
Benzo (k) fluoranthene	--	--	<0.046	<0.047	NA	NA	NA	NA	<0.042	<0.13	NA
Chrysene	0.2	0.02	<0.041	<0.042	NA	NA	NA	NA	<0.049	<0.10	NA
Fluoranthene	400	80	<0.081	<0.083	NA	NA	NA	NA	<0.024	<0.20	NA
Fluorene	400	80	<0.062	<0.063	NA	NA	NA	NA	<0.064	<0.16	NA
1-Methylnaphthalene	--	--	<0.32	<0.33	NA	NA	NA	NA	<0.44	<0.80	NA
2-Methylnaphthalene	--	--	<0.31	<0.32	NA	NA	NA	NA	<0.30	<0.78	NA
Naphthalene	100	10	<0.40	<0.41	NA	NA	NA	NA	<0.26	<1.0	NA
Phenanthrene	--	--	<0.030	<0.031	NA	NA	NA	NA	<0.020	<0.075	NA
Pyrene	250	50	<0.044	<0.045	NA	NA	NA	NA	<0.040	<0.11	NA

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**Table 7. Summary of Site-Wide Groundwater Analytical Results and Comparison to WDNR Criteria, Former Meritor Facility, Oshkosh, Wisconsin.**

Name Sample Date	ES	PAL	MW-7	MW-99	MW-7	DUP-99	MW-7 (continued)		MW-9		
			09/28/04	09/28/04	05/03/06	05/03/06	08/14/06	02/15/07	06/15/04	09/27/04	05/03/06
<b>Metals</b>											
Arsenic	10	1	<0.79	NA	<0.79	NA	<0.42	<b>1.6 J</b>	<25	<b>2.4</b>	<b>1.8 J</b>
Barium	2,000	400	140	NA	160	NA	140	180	190	160	220
Cadmium	5	0.5	<0.14	NA	<0.14	NA	<0.14	<0.14	<b>2.6</b>	<0.14	<0.14
Chromium	100	10	NA	NA	NA	NA	0.2 J	NA	NA	NA	NA
Lead	15	1.5	<1.4	NA	<1.4	NA	NA	<1.4	<13	<1.4	<1.4

Note: Only compounds detected in one or more samples are in table. For a complete list, refer to the laboratory report.

Note: All concentrations are reported in micrograms per liter (µg/L).

<b>BOLD</b>	Value exceeds the ES.
	Value exceeds the PAL.
ES	NR 140 Enforcement standard.
J	Sample concentration is less than the practical quantitation limit.
M8	MS and/or MSD were below the acceptance limits.
NA	Not analyzed.
PAL	NR 140 Preventive action limit.
PAHs	Polynuclear-aromatic hydrocarbons.
Q	Concentration between limit of detection and limit of quantitation.
VOCs	Volatile organic compounds.
WDNR	Wisconsin Department of Natural Resources.

Table 7. Summary of Site-Wide Groundwater Analytical Results and Comparison to WDNR Criteria, Former Meritor Facility, Oshkosh, Wisconsin.

Name	ES	PAL	MW-9 (continued)				MW-10				Dup-97
			08/14/06	02/14/07	05/10/07	06/23/09	06/15/04	09/28/04	05/05/06	08/16/06	08/16/06
<b>VOC</b>											
Benzene	5	0.5	<0.20	<0.25	NA	NA	<0.20	<0.20	<1.0	<0.20	<0.20
1,2-Dichloroethane	5	0.5	NA	NA	NA	NA	<0.50	<0.50	NA	NA	NA
Ethylbenzene	700	140	<0.50	<0.22	NA	NA	<0.50	<0.50	<2.5	<0.50	<0.50
Isopropylbenzene	--	--	NA	NA	NA	NA	<0.20	<0.20	NA	NA	NA
Naphthalene	100	10	<0.25	NA	NA	NA	<0.25	<0.25	<1.2	<0.25	<0.25
n-Propylbenzene	--	--	NA	NA	NA	NA	<0.50	<0.50	NA	NA	NA
p-Isopropyltoluene	--	--	NA	NA	NA	NA	<0.20	<0.20	NA	NA	NA
sec-Butylbenzene	--	--	NA	NA	NA	NA	<0.25	<0.25	NA	NA	NA
Toluene	1,000	200	<0.20	<0.11	NA	NA	<0.20	<0.20	<1.0	<0.20	<0.20
1,2,4-Trimethylbenzene	--	--	<0.20	<0.25	NA	NA	<0.20	<0.20	<1.0	<0.20	<0.20
1,3,5-Trimethylbenzene	--	--	<0.20	<0.19	NA	NA	<0.20	<0.20	<1.0	<0.20	<0.20
Trimethylbenzenes (Total)	480	96	<0.4	<0.44	NA	NA	<0.4	<0.4	<2	<0.4	<0.4
Xylenes, Total	10,000	1,000	<0.50	<0.39	NA	NA	<0.50	<0.50	<2.5	<0.50	<0.50
<b>PAH</b>											
Acenaphthene	--	--	NA	NA	<0.33 M8	<0.34	<0.63	<0.34	NA	NA	NA
Anthracene	3,000	600	NA	NA	<0.038 M8	<0.039	<0.037	<0.039	NA	NA	NA
Benzo (a) anthracene	--	--	NA	NA	<0.044	<0.045	<0.061	<0.045	NA	NA	NA
Benzo (a) pyrene	--	--	NA	NA	<0.032	<0.033	<0.036	<0.033	NA	NA	NA
Benzo (k) fluoranthene	--	--	NA	NA	<0.044	<0.045	<0.044	<0.045	NA	NA	NA
Chrysene	0.2	0.02	NA	NA	<0.041	<0.042	<0.053	<0.042	NA	NA	NA
Fluoranthene	400	80	NA	NA	<0.082	<0.083	<0.026	<0.083	NA	NA	NA
Fluorene	400	80	NA	NA	<0.063 M8	<0.064	<0.070	<0.064	NA	NA	NA
1-Methylnaphthalene	--	--	NA	NA	<0.32 M8	<0.33	<0.48	<0.33	NA	NA	NA
2-Methylnaphthalene	--	--	NA	NA	<0.31 M8	<0.32	<0.33	<0.32	NA	NA	NA
Naphthalene	100	10	NA	NA	<0.4 M8	<0.41	<0.28	<0.41	NA	NA	NA
Phenanthrene	--	--	NA	NA	<0.03	<0.031	<0.022	<0.031	NA	NA	NA
Pyrene	250	50	NA	NA	<0.044	<0.045	<0.044	<0.045	NA	NA	NA

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**Table 7. Summary of Site-Wide Groundwater Analytical Results and Comparison to WDNR Criteria, Former Meritor Facility, Oshkosh, Wisconsin.**

Name	ES	PAL	MW-9 (continued)				MW-10				Dup-97
			08/14/06	02/14/07	05/10/07	06/23/09	06/15/04	09/28/04	05/05/06	08/16/06	
<b>Metals</b>											
Arsenic	10	1	<b>6.18</b>	<b>5.4</b>	<1	<1	<25	<0.79	<b>1.1 J</b>	<0.42	NA
Barium	2,000	400	180	150	180	180	170	66	200	64	NA
Cadmium	5	0.5	<0.14	0.18 J	<0.14	<0.14	<b>1.9</b>	<0.14	<0.14	<0.14	NA
Chromium	100	10	0.74	NA	5.3 J	5.3 J	NA	NA	NA	<0.19	NA
Lead	15	1.5	NA	<1.4	<1.4	<1.4	<13	<1.4	<1.4	NA	NA

Note: Only compounds detected in one or more samples are in table. For a complete list, refer to the laboratory report.

Note: All concentrations are reported in micrograms per liter (µg/L).

- BOLD** Value exceeds the ES.
- Value exceeds the PAL.
- ES NR 140 Enforcement standard.
- J Sample concentration is less than the practical quantitation limit.
- M8 MS and/or MSD were below the acceptance limits.
- NA Not analyzed.
- PAL NR 140 Preventive action limit.
- PAHs Polynuclear-aromatic hydrocarbons.
- Q Concentration between limit of detection and limit of quantitation.
- VOCs Volatile organic compounds.
- WDNR Wisconsin Department of Natural Resources.

Table 7. Summary of Site-Wide Groundwater Analytical Results and Comparison to WDNR Criteria, Former Meritor Facility, Oshkosh, Wisconsin.

Name	ES	PAL	MW-10			MW-11			MW-12		
			02/13/07	06/15/04	09/28/04	05/03/06	08/15/06	02/14/07	06/15/04	09/28/04	05/03/06
<b>VOC</b>											
Benzene	5	0.5	<0.25	<0.20	<0.20	<1.0	<0.20	<0.25	<0.20	<0.20	<1.0
1,2-Dichloroethane	5	0.5	NA	<0.50	<0.50	NA	NA	NA	<0.50	<0.50	NA
Ethylbenzene	700	140	<0.22	<0.50	<0.50	<2.5	<0.50	<0.22	<0.50	<0.50	<2.5
Isopropylbenzene	--	--	NA	<0.20	<0.20	NA	NA	NA	<0.20	<0.20	NA
Naphthalene	100	10	NA	<0.25	<0.25	<1.2	<0.25	NA	<0.25	<0.25	<1.2
n-Propylbenzene	--	--	NA	<0.50	<0.50	NA	NA	NA	<0.50	<0.50	NA
p-Isopropyltoluene	--	--	NA	<0.20	<0.20	NA	NA	NA	0.89	<0.20	NA
sec-Butylbenzene	--	--	NA	<0.25	<0.25	NA	NA	NA	<0.25	<0.25	NA
Toluene	1,000	200	0.53	<0.20	<0.20	<1.0	<0.20	<0.11	<0.20	<0.20	<1.0
1,2,4-Trimethylbenzene	--	--	0.39 J	<0.20	<0.20	<1.0	<0.20	<0.25	<0.20	<0.20	<1.0
1,3,5-Trimethylbenzene	--	--	<0.19	<0.20	<0.20	<1.0	<0.20	<0.19	<0.20	<0.20	<1.0
Trimethylbenzenes (Total)	480	96	<0.19	<0.4	<0.4	<2	<0.4	<0.44	<0.4	<0.4	<2
Xylenes, Total	10,000	1,000	<0.39	1.4	<0.50	<2.5	<0.50	<0.39	<0.50	<0.50	<2.5
<b>PAH</b>											
Acenaphthene	--	--	NA	<1.4	<0.34	NA	NA	NA	<0.58	<0.34	NA
Anthracene	3,000	600	NA	<0.085	<0.039	NA	NA	NA	<0.034	<0.039	NA
Benzo (a) anthracene	--	--	NA	<0.14	<0.045	NA	NA	NA	<0.056	<0.045	NA
Benzo (a) pyrene	--	--	NA	<0.082	<0.033	NA	NA	NA	<0.033	<0.033	NA
Benzo (k) fluoranthene	--	--	NA	<0.10	<0.045	NA	NA	NA	<0.040	<0.045	NA
Chrysene	0.2	0.02	NA	<0.12	<0.042	NA	NA	NA	<0.049	<0.042	NA
Fluoranthene	400	80	NA	<0.060	<0.083	NA	NA	NA	<0.024	<0.083	NA
Fluorene	400	80	NA	<0.16	<0.064	NA	NA	NA	<0.064	<0.063	NA
1-Methylnaphthalene	--	--	NA	<1.1	<0.33	NA	NA	NA	<0.44	<0.33	NA
2-Methylnaphthalene	--	--	NA	<0.75	<0.32	NA	NA	NA	<0.30	<0.32	NA
Naphthalene	100	10	NA	<0.65	<0.41	NA	NA	NA	<0.26	<0.41	NA
Phenanthrene	--	--	NA	<0.050	<0.031	NA	NA	NA	<0.020	<0.031	NA
Pyrene	250	50	NA	<0.10	<0.045	NA	NA	NA	<0.040	<0.045	NA

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**Table 7. Summary of Site-Wide Groundwater Analytical Results and Comparison to WDNR Criteria, Former Meritor Facility, Oshkosh, Wisconsin.**

Name Sample Date	ES	PAL	MW-10			MW-11			MW-12		
			02/13/07	06/15/04	09/28/04	05/03/06	08/15/06	02/14/07	06/15/04	09/28/04	05/03/06
<b>Metals</b>											
Arsenic	10	1	<1	<25	<0.79	<0.79	4.33	4.9	<25	5.4	<0.79
Barium	2,000	400	79	510	500	170	220	130	470	380	190
Cadmium	5	0.5	<0.14	3.9	0.16	0.16 J	<0.14	<0.14	3.9	0.27	0.18 J
Chromium	100	10	NA	NA	NA	NA	1.2	NA	NA	NA	NA
Lead	15	1.5	<1.4	<13	<1.4	<1.4	NA	<1.4	<13	<1.4	<1.4

Note: Only compounds detected in one or more samples are in table. For a complete list, refer to the laboratory report.

Note: All concentrations are reported in micrograms per liter (µg/L).

<b>BOLD</b>	Value exceeds the ES.
	Value exceeds the PAL.
ES	NR 140 Enforcement standard.
J	Sample concentration is less than the practical quantitation limit.
M8	MS and/or MSD were below the acceptance limits.
NA	Not analyzed.
PAL	NR 140 Preventive action limit.
PAHs	Polynuclear-aromatic hydrocarbons.
Q	Concentration between limit of detection and limit of quantitation.
VOCs	Volatile organic compounds.
WDNR	Wisconsin Department of Natural Resources.

Table 7. Summary of Site-Wide Groundwater Analytical Results and Comparison to WDNR Criteria, Former Meritor Facility, Oshkosh, Wisconsin.

Name	ES	PAL	MW-12 (continued)		MW-21	MW-22	MW-23		MW-25	MW-26	
			08/15/06	02/14/07	06/22/09	06/22/09	06/22/09	01/14/10	06/23/09	06/24/09	01/13/10
<b>VOC</b>											
Benzene	5	0.5	<0.20	<0.25	NA	NA	NA	<0.20	NA	<0.20	<0.20
1,2-Dichloroethane	5	0.5	NA	NA	NA	NA	NA	<0.50	NA	<0.50	<0.50
Ethylbenzene	700	140	<0.50	<0.22	NA	NA	NA	<0.50	NA	<0.50	<0.50
Isopropylbenzene	--	--	NA	NA	NA	NA	NA	<0.20	NA	<0.20	<0.20
Naphthalene	100	10	<0.25	NA	NA	NA	NA	<0.25	NA	<0.25	<0.25
n-Propylbenzene	--	--	NA	NA	NA	NA	NA	<0.20	NA	<0.20	<0.20
p-Isopropyltoluene	--	--	NA	NA	NA	NA	NA	1.8	NA	<0.20	<0.20
sec-Butylbenzene	--	--	NA	NA	NA	NA	NA	<0.25	NA	<0.25	<0.25
Toluene	1,000	200	<0.20	<0.11	NA	NA	NA	<0.20	NA	<0.20	<0.20
1,2,4-Trimethylbenzene	--	--	<0.20	<0.25	NA	NA	NA	<0.20	NA	0.30 J	<0.20
1,3,5-Trimethylbenzene	--	--	<0.20	<0.19	NA	NA	NA	<0.20	NA	<0.20	<0.20
Trimethylbenzenes (Total)	480	96	<0.4	<0.44	NA	NA	NA	<0.4	NA	0.3	<0.4
Xylenes, Total	10,000	1,000	<0.50	<0.39	NA	NA	NA	<0.50	NA	<0.50	<0.50
<b>PAH</b>											
Acenaphthene	--	--	NA	NA	<0.88	<0.33	<0.33	<0.33	<0.33	<0.33	<0.33
Anthracene	3,000	600	NA	NA	2.2 J	0.09 J	<0.038	<0.038	<0.038	<0.038	<0.038
Benzo (a) anthracene	--	--	NA	NA	<0.12	<0.044	<0.044	<0.044	<0.044	<0.044	<0.044
Benzo (a) pyrene	--	--	NA	NA	<0.085	<0.032	<0.032	0.049 J	<0.032	<0.032	<0.032
Benzo (k) fluoranthene	--	--	NA	NA	<0.14	<0.046	<0.046	<0.046	<0.046	<0.046	<0.046
Chrysene	0.2	0.02	NA	NA	<0.11	<0.041	<0.041	0.065 J	<0.041	<0.041	<0.041
Fluoranthene	400	80	NA	NA	<0.22	<0.081	<0.081	<0.081	<0.081	<0.081	<0.081
Fluorene	400	80	NA	NA	<0.17	0.1 J	<0.062	<0.062	<0.062	<0.062	<0.062
1-Methylnaphthalene	--	--	NA	NA	<0.85	<0.32	0.41 J	<0.32	<0.32	<0.32	<0.32
2-Methylnaphthalene	--	--	NA	NA	<0.83	0.65 J	0.50 J	<0.31	<0.31	<0.31	<0.31
Naphthalene	100	10	NA	NA	<1.1	<0.40	<0.40	<0.40	<0.40	<0.40	<0.40
Phenanthrene	--	--	NA	NA	<0.080	0.19	<0.03	0.13	<0.03	<0.03	<0.03
Pyrene	250	50	NA	NA	<0.12	<0.044	<0.044	0.38	<0.044	<0.044	<0.044

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Table 7. Summary of Site-Wide Groundwater Analytical Results and Comparison to WDNR Criteria, Former Meritor Facility, Oshkosh, Wisconsin.

Name	ES	PAL	MW-12 (continued)		MW-21	MW-22	MW-23		MW-25	MW-26		
			08/15/06	02/14/07	06/22/09	06/22/09	06/22/09	01/14/10	06/23/09	06/24/09	01/13/10	
<b>Metals</b>												
Arsenic	10	1	5.32	7.7	NA	NA						
Barium	2,000	400	190	290	NA	NA						
Cadmium	5	0.5	<0.14	0.2 J	NA	NA						
Chromium	100	10	1.6	NA	NA							
Lead	15	1.5	NA	<1.4	NA	NA						

Note: Only compounds detected in one or more samples are in table. For a complete list, refer to the laboratory report.

Note: All concentrations are reported in micrograms per liter (µg/L).

<b>BOLD</b>	Value exceeds the ES.
	Value exceeds the PAL.
ES	NR 140 Enforcement standard.
J	Sample concentration is less than the practical quantitation limit.
M8	MS and/or MSD were below the acceptance limits.
NA	Not analyzed.
PAL	NR 140 Preventive action limit.
PAHs	Polynuclear-aromatic hydrocarbons.
Q	Concentration between limit of detection and limit of quantitation.
VOCs	Volatile organic compounds.
WDNR	Wisconsin Department of Natural Resources.

Table 7. Summary of Site-Wide Groundwater Analytical Results and Comparison to WDNR Criteria, Former Meritor Facility, Oshkosh, Wisconsin.

Name	ES	PAL	GP-45						GP-47	
			05/04/06	08/16/06	02/12/07	02/13/07	05/09/07	06/23/09	05/04/06	08/15/06
<b>VOC</b>										
Benzene	5	0.5	<1.0	<0.20	<0.25	NA	NA	NA	<1.0	0.21
1,2-Dichloroethane	5	0.5	NA							
Ethylbenzene	700	140	<2.5	<0.50	<0.22	NA	NA	NA	<2.5	<0.50
Isopropylbenzene	--	--	NA							
Naphthalene	100	10	<1.2	<0.25	NA	NA	NA	NA	<1.2	<0.25
n-Propylbenzene	--	--	NA							
p-Isopropyltoluene	--	--	NA							
sec-Butylbenzene	--	--	NA							
Toluene	1,000	200	<1.0	<0.20	0.24 J	NA	NA	NA	<1.0	<0.20
1,2,4-Trimethylbenzene	--	--	<1.0	<0.20	<0.25	NA	NA	NA	<1.0	0.24
1,3,5-Trimethylbenzene	--	--	<1.0	<0.20	<0.19	NA	NA	NA	<1.0	<0.20
Trimethylbenzenes (Total)	480	96	<2	<0.4	<0.44	NA	NA	NA	<2	0.24
Xylenes, Total	10,000	1,000	<2.5	<0.50	<0.39	NA	NA	NA	<2.5	<0.50
<b>PAH</b>										
Acenaphthene	--	--	NA	NA	NA	NA	NA	<0.33	NA	NA
Anthracene	3,000	600	NA	NA	NA	NA	NA	<0.038	NA	NA
Benzo (a) anthracene	--	--	NA	NA	NA	NA	NA	<0.044	NA	NA
Benzo (a) pyrene	--	--	NA	NA	NA	NA	NA	<0.032	NA	NA
Benzo (k) fluoranthene	--	--	NA	NA	NA	NA	NA	<0.046	NA	NA
Chrysene	0.2	0.02	NA	NA	NA	NA	NA	<0.041	NA	NA
Fluoranthene	400	80	NA	NA	NA	NA	NA	<0.083	NA	NA
Fluorene	400	80	NA	NA	NA	NA	NA	0.13 J	NA	NA
1-Methylnaphthalene	--	--	NA	NA	NA	NA	NA	<0.32	NA	NA
2-Methylnaphthalene	--	--	NA	NA	NA	NA	NA	<0.31	NA	NA
Naphthalene	100	10	NA	NA	NA	NA	NA	<0.40	NA	NA
Phenanthrene	--	--	NA	NA	NA	NA	NA	0.34	NA	NA
Pyrene	250	50	NA	NA	NA	NA	NA	<0.044	NA	NA

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**Table 7. Summary of Site-Wide Groundwater Analytical Results and Comparison to WDNR Criteria, Former Meritor Facility, Oshkosh, Wisconsin.**

Name	ES	PAL	GP-45						GP-47	
			05/04/06	08/16/06	02/12/07	02/13/07	05/09/07	06/23/09	05/04/06	08/15/06
<b>Metals</b>										
Arsenic	10	1	<b>19</b>	<b>22.9</b>	NA	<b>14</b>	<b>48</b>	NA	<b>8.2</b>	<b>11.4</b>
Barium	2,000	400	310	270	NA	270	250	NA	310	260
Cadmium	5	0.5	<0.14	<0.14	NA	0.44 J	<0.14	NA	<0.14	<0.14
Chromium	100	10	NA	0.5 J	NA	NA	<2.1	NA	NA	0.63 J
Lead	15	1.5	<1.4	NA	NA	<b>2.7 J</b>	<1.4	NA	<1.4	NA

Note: Only compounds detected in one or more samples are in table. For a complete list, refer to the laboratory report.

Note: All concentrations are reported in micrograms per liter (µg/L).

- BOLD** Value exceeds the ES.
- Value exceeds the PAL.
- ES NR 140 Enforcement standard.
- J Sample concentration is less than the practical quantitation limit.
- M8 MS and/or MSD were below the acceptance limits.
- NA Not analyzed.
- PAL NR 140 Preventive action limit.
- PAHs Polynuclear-aromatic hydrocarbons.
- Q Concentration between limit of detection and limit of quantitation.
- VOCs Volatile organic compounds.
- WDNR Wisconsin Department of Natural Resources.

Table 7. Summary of Site-Wide Groundwater Analytical Results and Comparison to WDNR Criteria, Former Meritor Facility, Oshkosh, Wisconsin.

Name Sample Date	ES	PAL	GP-47 (continued)			GP-56	DUP-98	GP-56		GP-62	
			02/13/07	05/09/07	06/23/09	05/05/06	05/05/06	08/16/06	02/13/07	05/05/06	08/15/06
<b>VOC</b>											
Benzene	5	0.5	<0.25	NA	NA	<1.0	<1.0	<0.20	<0.25	<0.20	<0.20
1,2-Dichloroethane	5	0.5	NA	NA	NA	NA	NA	NA	NA	<0.50	NA
Ethylbenzene	700	140	<0.22	NA	NA	<2.5	<2.5	<0.50	<0.22	<0.50	<0.50
Isopropylbenzene	--	--	NA	NA	NA	NA	NA	NA	NA	<0.20	NA
Naphthalene	100	10	NA	NA	NA	<1.2	<1.2	<0.25	NA	<0.25	<0.25
n-Propylbenzene	--	--	NA	NA	NA	NA	NA	NA	NA	<0.50	NA
p-Isopropyltoluene	--	--	NA	NA	NA	NA	NA	NA	NA	<0.20	NA
sec-Butylbenzene	--	--	NA	NA	NA	NA	NA	NA	NA	<0.25	NA
Toluene	1,000	200	0.12 J	NA	NA	<1.0	<1.0	<0.20	0.29 J	<0.20	<0.20
1,2,4-Trimethylbenzene	--	--	<0.25	NA	NA	<1.0	<1.0	1.8	<0.25	<0.20	<0.20
1,3,5-Trimethylbenzene	--	--	<0.19	NA	NA	<1.0	<1.0	0.46	<0.19	<0.20	<0.20
Trimethylbenzenes (Total)	480	96	<0.44	NA	NA	<2	<2	2.26	<0.44	<0.4	<0.4
Xylenes, Total	10,000	1,000	0.43 J	NA	NA	<2.5	<2.5	<0.50	<0.39	<0.50	<0.50
<b>PAH</b>											
Acenaphthene	--	--	NA	NA	0.49 J	NA	NA	NA	NA	NA	NA
Anthracene	3,000	600	NA	NA	5.5	NA	NA	NA	NA	NA	NA
Benzo (a) anthracene	--	--	NA	NA	15	NA	NA	NA	NA	NA	NA
Benzo (a) pyrene	--	--	NA	NA	<0.032	NA	NA	NA	NA	NA	NA
Benzo (k) fluoranthene	--	--	NA	NA	<0.046	NA	NA	NA	NA	NA	NA
Chrysene	0.2	0.02	NA	NA	47 E	NA	NA	NA	NA	NA	NA
Fluoranthene	400	80	NA	NA	120 E	NA	NA	NA	NA	NA	NA
Fluorene	400	80	NA	NA	7.8	NA	NA	NA	NA	NA	NA
1-Methylnaphthalene	--	--	NA	NA	14	NA	NA	NA	NA	NA	NA
2-Methylnaphthalene	--	--	NA	NA	25	NA	NA	NA	NA	NA	NA
Naphthalene	100	10	NA	NA	<0.40	NA	NA	NA	NA	NA	NA
Phenanthrene	--	--	NA	NA	62 E	NA	NA	NA	NA	NA	NA
Pyrene	250	50	NA	NA	170 E	NA	NA	NA	NA	NA	NA

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**Table 7. Summary of Site-Wide Groundwater Analytical Results and Comparison to WDNR Criteria, Former Meritor Facility, Oshkosh, Wisconsin.**

Name	ES	PAL	GP-47 (continued)			GP-56	DUP-98	GP-56		GP-62	
			02/13/07	05/09/07	06/23/09	05/05/06	05/05/06	08/16/06	02/13/07	05/05/06	08/15/06
<b>Metals</b>											
Arsenic	10	1	<b>11</b>	<b>8.7</b>	NA	<b>6</b>	NA	<b>5.99</b>	<b>14</b>	4.7	5.6
Barium	2,000	400	200	280	NA	67	NA	170	170	290	230
Cadmium	5	0.5	<0.14	<0.14	NA	<0.14	NA	<0.14	<0.14	<0.14	<b>840</b>
Chromium	100	10	NA	2.4 J	NA	NA	NA	0.46 J	NA	NA	0.9
Lead	15	1.5	<1.4	<1.4	NA	<1.4	NA	NA	<1.4	<1.4	NA

Note: Only compounds detected in one or more samples are in table. For a complete list, refer to the laboratory report.

Note: All concentrations are reported in micrograms per liter (µg/L).

<b>BOLD</b>	Value exceeds the ES.
	Value exceeds the PAL.
ES	NR 140 Enforcement standard.
J	Sample concentration is less than the practical quantitation limit.
M8	MS and/or MSD were below the acceptance limits.
NA	Not analyzed.
PAL	NR 140 Preventive action limit.
PAHs	Polynuclear-aromatic hydrocarbons.
Q	Concentration between limit of detection and limit of quantitation.
VOCs	Volatile organic compounds.
WDNR	Wisconsin Department of Natural Resources.

Table 7. Summary of Site-Wide Groundwater Analytical Results and Comparison to WDNR Criteria, Former Meritor Facility, Oshkosh, Wisconsin.

Name	ES	PAL	GP-62 (continued)			GP-64			GP-65	
			02/13/07	05/05/06	06/13/06	08/15/06	02/13/07	05/10/07	05/05/06	08/16/06
<b>VOC</b>										
Benzene	5	0.5	<0.25	0.3 J	NA	<0.20	<0.25	<0.2	<1.0	<0.20
1,2-Dichloroethane	5	0.5	NA	<0.50	NA	NA	NA	5	NA	NA
Ethylbenzene	700	140	<0.22	<0.50	NA	<0.50	<0.22	<0.5	<2.5	<0.50
Isopropylbenzene	--	--	NA	3.1	NA	NA	NA	<0.2	NA	NA
Naphthalene	100	10	NA	2.5	NA	1.2	NA	<0.25	<1.2	<0.25
n-Propylbenzene	--	--	NA	2.5	NA	NA	NA	<0.5	NA	NA
p-Isopropyltoluene	--	--	NA	0.47 J	NA	NA	NA	<0.2	NA	NA
sec-Butylbenzene	--	--	NA	0.33 J	NA	NA	NA	<0.25	NA	NA
Toluene	1,000	200	0.23 J	0.27 J	NA	<0.20	<0.11	<0.2	<1.0	<0.20
1,2,4-Trimethylbenzene	--	--	<0.25	9.8	NA	3.8	0.96	<0.2	<1.0	0.27
1,3,5-Trimethylbenzene	--	--	<0.19	3.4	NA	2.2	1.5	<0.2	<1.0	<0.20
Trimethylbenzenes (Total)	480	96	<0.44	13.2	NA	6	2.46	<0.4	<2	<0.6
Xylenes, Total	10,000	1,000	<0.39	21	NA	1.6	1.2 J	1.1 J	<2.5	<0.50
<b>PAH</b>										
Acenaphthene	--	--	NA	NA	<0.37	NA	NA	<0.35 M8	NA	NA
Anthracene	3,000	600	NA	NA	<0.043	NA	NA	0.20 M8	NA	NA
Benzo (a) anthracene	--	--	NA	NA	<0.049	NA	NA	<0.046	NA	NA
Benzo (a) pyrene	--	--	NA	NA	<0.036	NA	NA	<0.034	NA	NA
Benzo (k) fluoranthene	--	--	NA	NA	<0.051	NA	NA	<0.046	NA	NA
Chrysene	0.2	0.02	NA	NA	<0.046	NA	NA	<0.043	NA	NA
Fluoranthene	400	80	NA	NA	<0.091	NA	NA	<0.085	NA	NA
Fluorene	400	80	NA	NA	<0.070	NA	NA	0.58 M8	NA	NA
1-Methylnaphthalene	--	--	NA	NA	<0.36	NA	NA	0.82 M8, J	NA	NA
2-Methylnaphthalene	--	--	NA	NA	<0.35	NA	NA	1.2 M8	NA	NA
Naphthalene	100	10	NA	NA	<0.45	NA	NA	<0.42 M8	NA	NA
Phenanthrene	--	--	NA	NA	<0.034	NA	NA	1.6	NA	NA
Pyrene	250	50	NA	NA	<0.049	NA	NA	<0.046	NA	NA

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Table 7. Summary of Site-Wide Groundwater Analytical Results and Comparison to WDNR Criteria, Former Meritor Facility, Oshkosh, Wisconsin.

Name Sample Date	ES	PAL	GP-62 (continued)		GP-64			GP-65		
			02/13/07	05/05/06	06/13/06	08/15/06	02/13/07	05/10/07	05/05/06	08/16/06
<b>Metals</b>										
Arsenic	10	1	6.8	2.9	NA	4.64	4.1	<1	NA	NA
Barium	2,000	400	220	210	NA	460	290	250	NA	NA
Cadmium	5	0.5	<0.14	<0.14	NA	2.4	0.19 J	0.24 J	NA	NA
Chromium	100	10	NA	NA	NA	0.35 J	NA	4.3 J	NA	NA
Lead	15	1.5	<1.4	<1.4	NA	NA	<1.4	<1.4	NA	NA

Note: Only compounds detected in one or more samples are in table. For a complete list, refer to the laboratory report.

Note: All concentrations are reported in micrograms per liter (µg/L).

<b>BOLD</b>	Value exceeds the ES.
	Value exceeds the PAL.
ES	NR 140 Enforcement standard.
J	Sample concentration is less than the practical quantitation limit.
M8	MS and/or MSD were below the acceptance limits.
NA	Not analyzed.
PAL	NR 140 Preventive action limit.
PAHs	Polynuclear-aromatic hydrocarbons.
Q	Concentration between limit of detection and limit of quantitation.
VOCs	Volatile organic compounds.
WDNR	Wisconsin Department of Natural Resources.

Table 7. Summary of Site-Wide Groundwater Analytical Results and Comparison to WDNR Criteria, Former Meritor Facility, Oshkosh, Wisconsin.

Name	ES	PAL	GP-65 (continued)		GP-75				GP-76		
			02/14/07	06/23/09	05/05/06	08/15/06	02/13/07	05/10/07	05/02/06	06/13/06	08/15/06
<b>VOC</b>											
Benzene	5	0.5	<0.25	<0.20	<1.0	<0.20	<0.25	NA	<1.0	NA	<0.20
1,2-Dichloroethane	5	0.5	NA	<0.50	NA						
Ethylbenzene	700	140	<0.22	<0.50	<2.5	<0.50	<0.22	NA	<2.5	NA	<0.50
Isopropylbenzene	--	--	NA	<0.20	NA						
Naphthalene	100	10	NA	<0.25	<1.2	<0.25	NA	NA	<1.2	NA	<0.25
n-Propylbenzene	--	--	NA	<0.20	NA						
p-Isopropyltoluene	--	--	NA	<0.20	NA						
sec-Butylbenzene	--	--	NA	<0.25	NA						
Toluene	1,000	200	0.22 J	<0.20	<1.0	<0.20	<0.11	NA	<1.0	NA	<0.20
1,2,4-Trimethylbenzene	--	--	<0.25	<0.20	<1.0	<0.20	<0.25	NA	<1.0	NA	<0.20
1,3,5-Trimethylbenzene	--	--	<0.19	<0.20	<1.0	<0.20	<0.19	NA	<1.0	NA	<0.20
Trimethylbenzenes (Total)	480	96	<0.44	<0.40	<2	<0.4	<0.44	NA	<2	NA	<0.4
Xylenes, Total	10,000	1,000	<0.39	<0.50	<2.5	<0.50	<0.39	NA	<2.5	NA	<0.50
<b>PAH</b>											
Acenaphthene	--	--	NA	<0.40	NA	NA	NA	<0.37	NA	0.96 J	NA
Anthracene	3,000	600	NA	<0.046	NA	NA	NA	<0.042	NA	0.66	NA
Benzo (a) anthracene	--	--	NA	<0.053	NA	NA	NA	<0.049	NA	<0.049	NA
Benzo (a) pyrene	--	--	NA	<0.039	NA	NA	NA	<0.036	NA	<0.036	NA
Benzo (k) fluoranthene	--	--	NA	<0.053	NA	NA	NA	<0.049	NA	<0.049	NA
Chrysene	0.2	0.02	NA	<0.049	NA	NA	NA	<0.046	NA	<0.046	NA
Fluoranthene	400	80	NA	<0.089	NA	NA	NA	<0.09	NA	<0.091	NA
Fluorene	400	80	NA	<0.075	NA	NA	NA	<0.069	NA	2.4	NA
1-Methylnaphthalene	--	--	NA	<0.39	NA	NA	NA	<0.36	NA	12	NA
2-Methylnaphthalene	--	--	NA	<0.37	NA	NA	NA	<0.34	NA	21	NA
Naphthalene	100	10	NA	<0.48	NA	NA	NA	<0.44	NA	4.8	NA
Phenanthrene	--	--	NA	<0.036	NA	NA	NA	<0.033	NA	7.4	NA
Pyrene	250	50	NA	<0.053	NA	NA	NA	<0.049	NA	<0.049	NA

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**Table 7. Summary of Site-Wide Groundwater Analytical Results and Comparison to WDNR Criteria, Former Meritor Facility, Oshkosh, Wisconsin.**

Name Sample Date	ES	PAL	GP-65 (continued)		GP-75				GP-76		
			02/14/07	06/23/09	05/05/06	08/15/06	02/13/07	05/10/07	05/02/06	06/13/06	08/15/06
<b>Metals</b>											
Arsenic	10	1	NA	NA	<b>11</b>	<b>14.7</b>	<b>16</b>	NA	<0.79	NA	<b>1.16</b>
Barium	2,000	400	NA	NA	200	260	230	NA	<b>450</b>	NA	<b>460</b>
Cadmium	5	0.5	NA	NA	<0.14	<0.14	<0.14	NA	0.22 J	NA	0.3 J
Chromium	100	10	NA	NA	NA	1	NA	NA	NA	NA	1
Lead	15	1.5	NA	NA	<1.4	NA	<1.4	NA	<1.4	NA	NA

Note: Only compounds detected in one or more samples are in table. For a complete list, refer to the laboratory report.

Note: All concentrations are reported in micrograms per liter (µg/L).

<b>BOLD</b>	Value exceeds the ES.
	Value exceeds the PAL.
ES	NR 140 Enforcement standard.
J	Sample concentration is less than the practical quantitation limit.
M8	MS and/or MSD were below the acceptance limits.
NA	Not analyzed.
PAL	NR 140 Preventive action limit.
PAHs	Polynuclear-aromatic hydrocarbons.
Q	Concentration between limit of detection and limit of quantitation.
VOCs	Volatile organic compounds.
WDNR	Wisconsin Department of Natural Resources.

Table 7. Summary of Site-Wide Groundwater Analytical Results and Comparison to WDNR Criteria, Former Meritor Facility, Oshkosh, Wisconsin.

Name	ES	PAL	GP-76 (continued)		GP-80		GP-81	GP-83	GP-88	GP-99	GP-101
			02/15/07	05/09/07	05/09/07	06/23/09	05/09/07	05/09/07	05/10/07	05/10/07	05/09/07
<b>VOC</b>											
Benzene	5	0.5	<0.25	NA	NA	NA	NA	NA	NA	NA	NA
1,2-Dichloroethane	5	0.5	NA	NA	NA	NA	NA	NA	NA	NA	NA
Ethylbenzene	700	140	<0.22	NA	NA	NA	NA	NA	NA	NA	NA
Isopropylbenzene	--	--	NA	NA	NA	NA	NA	NA	NA	NA	NA
Naphthalene	100	10	NA	NA	NA	NA	NA	NA	NA	NA	NA
n-Propylbenzene	--	--	NA	NA	NA	NA	NA	NA	NA	NA	NA
p-Isopropyltoluene	--	--	NA	NA	NA	NA	NA	NA	NA	NA	NA
sec-Butylbenzene	--	--	NA	NA	NA	NA	NA	NA	NA	NA	NA
Toluene	1,000	200	<0.11	NA	NA	NA	NA	NA	NA	NA	NA
1,2,4-Trimethylbenzene	--	--	<0.25	NA	NA	NA	NA	NA	NA	NA	NA
1,3,5-Trimethylbenzene	--	--	<0.19	NA	NA	NA	NA	NA	NA	NA	NA
Trimethylbenzenes (Total)	480	96	<0.44	NA	NA	NA	NA	NA	NA	NA	NA
Xylenes, Total	10,000	1,000	<0.39	NA	NA	NA	NA	NA	NA	NA	NA
<b>PAH</b>											
Acenaphthene	--	--	NA	<0.34 M8	NA	<0.40	NA	<0.33 M8	<0.34 M8	<0.35	<0.35 M8
Anthracene	3,000	600	NA	<0.039 M8	NA	<0.046	NA	0.38 M8	<0.039 M8	<0.041	0.26 M8
Benzo (a) anthracene	--	--	NA	<0.045	NA	<0.053	NA	<0.044	<0.045	<0.047	0.059 J
Benzo (a) pyrene	--	--	NA	<0.033	NA	<0.039	NA	<0.032	<0.033	<0.034	0.058 J
Benzo (k) fluoranthene	--	--	NA	<0.045	NA	46	NA	<0.046	<0.045	<0.047	<0.048
Chrysene	0.2	0.02	NA	<0.042	NA	<0.049	NA	0.34	<0.042	<0.044	0.069 J
Fluoranthene	400	80	NA	<0.084	NA	<0.089	NA	2.4	0.15 J	<0.087	0.56
Fluorene	400	80	NA	<0.064 M8	NA	<0.075	NA	<0.063 M8	<0.063 M8	<0.067	0.36 M8
1-Methylnaphthalene	--	--	NA	<0.33 M8	NA	<0.39	NA	<0.32 M8	<0.33 M8	<0.34	0.52 M8, J
2-Methylnaphthalene	--	--	NA	<0.32 M8	NA	<0.37	NA	<0.31 M8	<0.32 M8	<0.33	1.0 M8, J
Naphthalene	100	10	NA	<0.41 M8	NA	<0.48	NA	<0.4 M8	<0.41 M8	<0.43	0.68 M8, J
Phenanthrene	--	--	NA	<0.031	NA	<0.036	NA	1.2	0.081 J	<0.032	1.2
Pyrene	250	50	NA	<0.045	NA	<0.053	NA	0.14 J	<0.045	<0.047	0.27

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Table 7. Summary of Site-Wide Groundwater Analytical Results and Comparison to WDNR Criteria, Former Meritor Facility, Oshkosh, Wisconsin.

Name Sample Date	ES	PAL	GP-76 (continued)		GP-80		GP-81	GP-83	GP-88	GP-99	GP-101
			02/15/07	05/09/07	05/09/07	06/23/09	05/09/07	05/09/07	05/10/07	05/10/07	05/09/07
<b>Metals</b>											
Arsenic	10	1	1 J	<1	<1	NA	<b>11</b>	<b>16</b>	<1	NA	<1
Barium	2,000	400	270	260	210	NA	240	210	160	NA	38
Cadmium	5	0.5	<b>0.89</b>	0.2 J	<0.14	NA	<0.14	<0.14	<0.14	NA	0.44 J
Chromium	100	10	NA	3.5 J	2.9 J	NA	3.2 J	5.8 J	<2.1	NA	<2.1
Lead	15	1.5	<1.4	<1.4	<1.4	NA	<1.4	<1.4	<1.4	NA	<1.4

Note: Only compounds detected in one or more samples are in table. For a complete list, refer to the laboratory report.

Note: All concentrations are reported in micrograms per liter (µg/L).

<b>BOLD</b>	Value exceeds the ES.
	Value exceeds the PAL.
ES	NR 140 Enforcement standard.
J	Sample concentration is less than the practical quantitation limit.
M8	MS and/or MSD were below the acceptance limits.
NA	Not analyzed.
PAL	NR 140 Preventive action limit.
PAHs	Polynuclear-aromatic hydrocarbons.
Q	Concentration between limit of detection and limit of quantitation.
VOCs	Volatile organic compounds.
WDNR	Wisconsin Department of Natural Resources.

Table 7. Summary of Site-Wide Groundwater Analytical Results and Comparison to WDNR Criteria, Former Meritor Facility, Oshkosh, Wisconsin.

Name Sample Date	ES	PAL	RW-2		RW-3		RW-4		RW-5	Trip Blank	
			05/09/07	05/09/07	01/13/10	05/09/07	07/02/09	05/09/07	06/15/04	09/27/04	
<b>VOC</b>											
Benzene	5	0.5	NA	NA	<0.20	NA	NA	NA	NA	<0.20	<0.20
1,2-Dichloroethane	5	0.5	NA	NA	<0.50	NA	NA	NA	NA	<0.50	<0.50
Ethylbenzene	700	140	NA	NA	<0.50	NA	NA	NA	NA	<0.50	<0.50
Isopropylbenzene	--	--	NA	NA	<0.20	NA	NA	NA	NA	<0.20	<0.20
Naphthalene	100	10	NA	NA	<0.25	NA	NA	NA	NA	<0.25	<0.25
n-Propylbenzene	--	--	NA	NA	<0.20	NA	NA	NA	NA	<0.50	<0.50
p-Isopropyltoluene	--	--	NA	NA	<0.20	NA	NA	NA	NA	<0.20	<0.20
sec-Butylbenzene	--	--	NA	NA	<0.25	NA	NA	NA	NA	<0.25	<0.25
Toluene	1,000	200	NA	NA	<0.20	NA	NA	NA	NA	<0.20	<0.20
1,2,4-Trimethylbenzene	--	--	NA	NA	<0.20	NA	NA	NA	NA	<0.20	<0.20
1,3,5-Trimethylbenzene	--	--	NA	NA	<0.20	NA	NA	NA	NA	<0.20	<0.20
Trimethylbenzenes (Total)	480	96	NA	NA	<0.4	NA	NA	NA	NA	<0.4	<0.4
Xylenes, Total	10,000	1,000	NA	NA	<0.50	NA	NA	NA	NA	<0.50	<0.50
<b>PAH</b>											
Acenaphthene	--	--	<0.41 M8	<0.33 M8	<0.33	<0.35 M8	<0.33	<0.33 M8	NA	NA	NA
Anthracene	3,000	600	<0.047 M8	<0.038 M8	0.13	<0.04 M8	<0.038	<0.038 M8	NA	NA	NA
Benzo (a) anthracene	--	--	<0.054	<0.044	0.083 J	<0.046	<0.044	<0.044	NA	NA	NA
Benzo (a) pyrene	--	--	<0.04	<0.032	<0.032	<0.034	<0.032	<0.032	NA	NA	NA
Benzo (k) fluoranthene	--	--	<0.054	<0.044	<0.046	<0.046	<0.044	<0.044	NA	NA	NA
Chrysene	0.2	0.02	<0.051	<0.041	0.10 J	<0.043	<0.041	<0.041	NA	NA	NA
Fluoranthene	400	80	<0.1	<0.081	0.28	<0.085	<0.081	<0.082	NA	NA	NA
Fluorene	400	80	0.29 M8	<0.062 M8	<0.062	<0.065 M8	<0.062	<0.063 M8	NA	NA	NA
1-Methylnaphthalene	--	--	0.67 M8, J	<0.32 M8	<0.32	<0.34 M8	<0.32	<0.32 M8	NA	NA	NA
2-Methylnaphthalene	--	--	<0.38 M8	<0.31 M8	<0.31	<0.33 M8	<0.31	<0.31 M8	NA	NA	NA
Naphthalene	100	10	<0.49 M8	<0.4 M8	<0.40	<0.42 M8	<0.40	<0.4 M8	NA	NA	NA
Phenanthrene	--	--	0.14	0.055 J	0.58	<0.032	0.12 J	<0.03	NA	NA	NA
Pyrene	250	50	<0.054	<0.044	0.67	<0.046	<0.044	<0.044	NA	NA	NA

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Table 7. Summary of Site-Wide Groundwater Analytical Results and Comparison to WDNR Criteria, Former Meritor Facility, Oshkosh, Wisconsin.

Name			RW-2	RW-3		RW-4		RW-5	Trip Blank	
Sample Date	ES	PAL	05/09/07	05/09/07	01/13/10	05/09/07	07/02/09	05/09/07	06/15/04	09/27/04
<b>Metals</b>										
Arsenic	10	1	1.8 J	<1	NA	<1	NA	<1	NA	NA
Barium	2,000	400	270	190	NA	270	NA	190	NA	NA
Cadmium	5	0.5	<0.14	<0.14	NA	<0.14	NA	<0.14	NA	NA
Chromium	100	10	2.3 J	<2.1	NA	2.6 J	NA	7.4	NA	NA
Lead	15	1.5	<1.4	<1.4	NA	<1.4	NA	<1.4	NA	NA

Note: Only compounds detected in one or more samples are in table. For a complete list, refer to the laboratory report.

Note: All concentrations are reported in micrograms per liter (µg/L).

<b>BOLD</b>	Value exceeds the ES.
	Value exceeds the PAL.
ES	NR 140 Enforcement standard.
J	Sample concentration is less than the practical quantitation limit.
M8	MS and/or MSD were below the acceptance limits.
NA	Not analyzed.
PAL	NR 140 Preventive action limit.
PAHs	Polynuclear-aromatic hydrocarbons.
Q	Concentration between limit of detection and limit of quantitation.
VOCs	Volatile organic compounds.
WDNR	Wisconsin Department of Natural Resources.

Table 7. Summary of Site-Wide Groundwater Analytical Results and Comparison to WDNR Criteria, Former Meritor Facility, Oshkosh, Wisconsin.

Name Sample Date	ES	PAL	Trip Blank (continued)			
			05/05/06	08/14/06	02/12/07	05/10/07
<b>VOC</b>						
Benzene	5	0.5	<0.20	<0.20	<0.25	<0.2
1,2-Dichloroethane	5	0.5	NA	NA	NA	<0.5
Ethylbenzene	700	140	<0.50	<0.50	<0.22	<0.5
Isopropylbenzene	--	--	NA	NA	NA	<0.2
Naphthalene	100	10	<0.25	<0.25	NA	<0.25
n-Propylbenzene	--	--	NA	NA	NA	<0.5
p-Isopropyltoluene	--	--	NA	NA	NA	<0.2
sec-Butylbenzene	--	--	NA	NA	NA	<0.25
Toluene	1,000	200	<0.20	<0.20	<0.11	<0.2
1,2,4-Trimethylbenzene	--	--	<0.20	<0.20	<0.25	<0.2
1,3,5-Trimethylbenzene	--	--	<0.20	<0.20	<0.19	<0.2
Trimethylbenzenes (Total)	480	96	<0.4	<0.4	<0.44	<0.4
Xylenes, Total	10,000	1,000	<0.50	<0.50	<0.39	<0.5
<b>PAH</b>						
Acenaphthene	--	--	NA	NA	NA	NA
Anthracene	3,000	600	NA	NA	NA	NA
Benzo (a) anthracene	--	--	NA	NA	NA	NA
Benzo (a) pyrene	--	--	NA	NA	NA	NA
Benzo (k) fluoranthene	--	--	NA	NA	NA	NA
Chrysene	0.2	0.02	NA	NA	NA	NA
Fluoranthene	400	80	NA	NA	NA	NA
Fluorene	400	80	NA	NA	NA	NA
1-Methylnaphthalene	--	--	NA	NA	NA	NA
2-Methylnaphthalene	--	--	NA	NA	NA	NA
Naphthalene	100	10	NA	NA	NA	NA
Phenanthrene	--	--	NA	NA	NA	NA
Pyrene	250	50	NA	NA	NA	NA

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Table 7. Summary of Site-Wide Groundwater Analytical Results and Comparison to WDNR Criteria, Former Meritor Facility, Oshkosh, Wisconsin.

Name Sample Date	ES	PAL	Trip Blank (continued)			
			05/05/06	08/14/06	02/12/07	05/10/07
<b>Metals</b>						
Arsenic	10	1	NA	NA	NA	NA
Barium	2,000	400	NA	NA	NA	NA
Cadmium	5	0.5	NA	NA	NA	NA
Chromium	100	10	NA	NA	NA	NA
Lead	15	1.5	NA	NA	NA	NA

Note: Only compounds detected in one or more samples are in table. For a complete list, refer to the laboratory report.

Note: All concentrations are reported in micrograms per liter (µg/L).

<b>BOLD</b>	Value exceeds the ES.
	Value exceeds the PAL.
ES	NR 140 Enforcement standard.
J	Sample concentration is less than the practical quantitation limit.
M8	MS and/or MSD were below the acceptance limits.
NA	Not analyzed.
PAL	NR 140 Preventive action limit.
PAHs	Polynuclear-aromatic hydrocarbons.
Q	Concentration between limit of detection and limit of quantitation.
VOCs	Volatile organic compounds.
WDNR	Wisconsin Department of Natural Resources.

Table 10. Summary of Static Groundwater Elevation Data and LNAPL Thickness, Former Meritor Facility, Oshkosh, Wisconsin.

Well	Ground Surface Elevation (ft msl)	Top-of-Casing Elevation (ft msl)	Screened Interval (ft msl)	Measurement Date	Depth to LNAPL (feet)	Depth to Water (feet)	LNAPL Thickness (feet)	Water Level Elevation (ft msl)
EW-1	754.00	753.32	749.70-739.70	5/21/04	5.34	5.64	0.3	747.41*
				6/14/04	4.8	5.21	0.41	747.75*
				9/27/04	5.34	7.11	1.77	744.67*
				3/4/05	6.23	6.27	0.04	747.01*
				5/2/06	6.03	6.15	0.12	747.06*
				2/12/07	6.53	7.89	1.36	744.25*
				5/7/07	5.83	5.91	0.08	747.34*
				6/6/07	5.92	5.92	NP	NM
				2/21/08	6.55	7.4	0.85	NM
				3/20/08	6.35	6.7	0.35	NM
				5/1/08	5.65	5.71	0.06	NM
				7/16/08	5.62	5.92	0.3	NM
				10/15/08	5.96	6.64	0.68	NM
				12/1/08	6.25	7.18	0.93	NM
				2/10/09	6.24	8.28	2.04	NM
				4/1/09	5.82	6.14	0.32	NM
				6/19/09	5.91	6.15	0.24	NM
				1/13/10	6.32	7.23	0.91	NM
				5/28/10	5.57	7.02	1.45	NM
MW-1	753.95	753.48	749.95-739.95	5/21/04	NP	5.79	NP	747.69
				6/14/04	NP	5.11	NP	748.37
				9/27/04	5.90	6.23	0.33	746.96*
				3/4/05	6.39	6.71	0.32	746.49*
				5/2/06	5.96	6.59	0.63	746.34*
				8/14/06	5.87	6.44	0.57	NM
				2/12/07	NM	6.62	NM	746.86
				5/7/07	5.70	6.40	0.70	746.47*
				11/16/09	6.30	6.44	0.14	NM
				1/13/10	6.36	6.88	0.52	NM
				6/6/07	5.72	6.25	0.53	NM
				2/21/08	6.4	7.5	1.10	NM
				3/20/08	6.85	7.11	0.26	NM
				5/1/08	5.5	5.85	0.35	NM
				7/16/08	5.52	5.68	0.16	NM
				10/15/08	5.92	6.36	0.44	NM
				12/1/08	6.22	6.59	0.37	NM
				2/10/09	6.3	6.94	0.64	NM
				4/1/09	5.65	6.31	0.66	NM
6/19/09	5.72	6.37	0.65	NM				
11/16/09	6.3	6.44	0.14	NM				
1/13/10	6.36	6.88	0.52	NM				
5/28/10	5.62	6.27	0.65	NM				
MW-2	754.00	753.72	750-740	5/21/04	NP	5.81	NP	747.91
				6/14/04	NP	5.13	NP	748.59
				9/27/04	NP	5.96	NP	747.76
				3/4/05	NP	6.19	NP	747.53

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Table 10. Summary of Static Groundwater Elevation Data and LNAPL Thickness, Former Meritor Facility, Oshkosh, Wisconsin.

Well	Ground Surface Elevation (ft msl)	Top-of-Casing Elevation (ft msl)	Screened Interval (ft msl)	Measurement Date	Depth to LNAPL (feet)	Depth to Water (feet)	LNAPL Thickness (feet)	Water Level Elevation (ft msl)
MW-2 (continued)				5/2/06	NP	5.95	NP	747.77
				8/14/06	NP	5.88	NP	747.84
				2/12/07	6.65	6.68	0.03	747.01*
				5/7/07	NP	5.69	NP	748.03
				6/22/09	5.68	5.79	0.11	747.93
				5/28/10	5.60	5.60	NP	NM
MW-3	753.99	753.48	749.99-739.99	5/21/04	NP	5.23	NP	748.25
				6/14/04	NP	4.68	NP	748.80
				9/27/04	NP	5.77	NP	747.71
				3/4/05	NP	5.81	NP	747.67
				5/2/06	NP	5.46	NP	748.02
				8/14/06	NP	5.58	NP	747.90
				2/12/07	NP	6.52	NP	746.96
				5/7/07	NP	5.14	NP	748.34
MW-4	750.13	749.87	746.13-736.13	6/22/09	NP	5.01	NP	748.47
				5/21/04	NP	3.68	NP	746.19
				6/14/04	NP	3.18	NP	746.69
				9/27/04	NP	4.08	NP	745.79
				3/4/05	NP	4.24	NP	745.63
				5/2/06	NP	3.80	NP	746.07
				8/14/06	NP	4.01	NP	745.86
				2/12/07	NP	4.71	NP	745.16
MW-5	751.71	751.11	747.71-737.71	5/7/07	NP	3.14	NP	746.73
				5/21/04	NP	3.12	NP	747.99
				6/14/04	NP	2.39	NP	748.72
				9/27/04	NP	3.34	NP	747.77
				3/4/05	NP	3.85	NP	747.26
				5/2/06	NP	3.50	NP	747.61
				8/14/06	NP	3.37	NP	747.74
MW-6	750.36	750.01	746.36-736.36	2/12/07	NP	4.43	NP	746.68
				5/7/07	NP	3.19	NP	747.92
				5/21/04	NP	3.85	NP	746.16
				6/14/04	NP	3.28	NP	746.73
				9/27/04	NP	4.26	NP	745.75
				3/4/05	NP	4.34	NP	745.67
				5/2/06	NP	3.99	NP	746.02
MW-7	757.61	757.21	753.61-743.61	8/14/06	NP	4.25	NP	745.76
				2/12/07	NP	4.84	NP	745.17
				5/7/07	NP	3.79	NP	746.22
				5/21/04	NP	5.34	NP	751.87
				6/14/04	NP	4.36	NP	752.85
				9/27/04	NM	NM	NM	NM
				3/4/05	NP	6.65	NP	750.56
5/2/06	NP	6.60	NP	750.61				
			8/14/06	NP	6.98	NP	750.23	

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Table 10. Summary of Static Groundwater Elevation Data and LNAPL Thickness, Former Meritor Facility, Oshkosh, Wisconsin.

Well	Ground Surface Elevation (ft msl)	Top-of-Casing Elevation (ft msl)	Screened Interval (ft msl)	Measurement Date	Depth to LNAPL (feet)	Depth to Water (feet)	LNAPL Thickness (feet)	Water Level Elevation (ft msl)
MW-7				2/12/07	NP	7.24	NP	749.97
(continued)				5/7/07	NP	5.85	NP	751.36
MW-8	750.20	749.98	746.20-736.20	5/21/04	NP	1.84	NP	748.14
				6/14/04	NP	1.07	NP	748.91
				9/27/04	NP	3.02	NP	746.96
				3/4/05	NP	3.33	NP	746.65
				5/2/06	NP	2.47	NP	747.51
				8/14/06	NP	2.36	NP	747.62
				2/12/07	NP	3.37	NP	746.61
				5/7/07	NP	2.30	NP	747.68
				7/9/08	NP	2.01	NP	747.97
				6/22/09	NP	2.11	NP	747.87
				11/19/09	NP	2.82	NP	747.16
MW-9	752.44	752.10	748.44-738.44	5/21/04	NP	3.01	NP	749.09
				6/14/04	NP	2.45	NP	749.65
				9/27/04	NP	4.18	NP	747.92
				3/4/05	NP	3.71	NP	748.39
				5/2/06	NP	3.26	NP	748.84
				5/8/06	NP	3.81	NP	748.29
				2/12/07	NP	4.95	NP	747.15
				5/7/07	NP	2.85	NP	749.25
				6/22/09	NP	3.28	NP	748.82
MW-10	753.98	753.70	749.98-739.98	5/21/04	NP	3.7	NP	750.00
				6/14/04	NP	3.42	NP	750.28
				9/27/04	NP	4.61	NP	749.09
				3/4/05	NP	4.09	NP	749.61
				5/2/06	NP	4.11	NP	749.59
				8/14/06	NP	3.82	NP	749.88
				2/12/07	NP	5.03	NP	748.67
				5/7/07	NP	4.28	NP	749.42
MW-11	752.20	751.86	748.20-738.20	5/21/04	NP	2.42	NP	749.44
				6/14/04	NP	2.11	NP	749.75
				9/27/04	NP	3.04	NP	748.82
				3/4/05	NP	3.34	NP	748.52
				5/2/06	NP	3.27	NP	748.59
				8/14/06	NP	3.57	NP	748.29
				2/12/07	NP	4.66	NP	747.20
				5/7/07	NP	2.86	NP	749.00
MW-12	750.38	750.14	746.38-736.38	5/21/04	NP	1.08	NP	749.06
				6/14/04	NP	0.63	NP	749.51
				9/27/04	NP	2.00	NP	748.14
				3/4/05	NP	2.71	NP	747.43
				5/2/06	NP	1.97	NP	748.17
				8/14/06	NP	2.13	NP	748.01
				2/12/07	NP	3.36	NP	746.78
				5/7/07	NP	1.97	NP	748.17

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Table 10. Summary of Static Groundwater Elevation Data and LNAPL Thickness, Former Meritor Facility, Oshkosh, Wisconsin.

Well	Ground Surface Elevation (ft msl)	Top-of-Casing Elevation (ft msl)	Screened Interval (ft msl)	Measurement Date	Depth to LNAPL (feet)	Depth to Water (feet)	LNAPL Thickness (feet)	Water Level Elevation (ft msl)
MW-13	751.64	751.29		5/7/07	NP	2.82	NP	748.47
	751.64	751.29		7/9/08	NP	2.79	NP	748.50
	751.64	751.29		6/22/09	NP	2.67	NP	748.62
	751.64	751.29		11/19/09	NP	3.60	NP	747.69
MW-14	750.97	750.61		5/7/07	NP	1.99	NP	748.62
	750.97	750.61		7/9/08	NP	1.64	NP	748.97
MW-15	750.92	750.50		5/7/07	NP	2.30	NP	748.20
	750.92	750.50		7/9/08	NP	2.21	NP	748.29
	750.92	750.50		6/22/09	NP	2.33	NP	748.17
	750.92	750.50		11/19/09	NP	2.86	NP	747.64
MW-16	750.95	750.44		5/7/07	NP	1.95	NP	748.49
	750.95	750.44		7/9/08	NP	1.45	NP	748.99
	750.95	750.44		6/22/09	NP	2.19	NP	748.25
	750.95	750.44		11/19/09	NP	2.83	NP	747.61
MW-17	750.43	749.97		5/7/07	NP	2.15	NP	747.82
	750.43	749.97		7/9/08	NP	1.86	NP	748.11
MW-18	NM	NM		6/22/09	NP	5.18	NP	NM
				11/19/09	NP	5.94	NP	NM
MW-19	NM	NM		6/22/09	NP	4.71	NP	NM
				11/19/09	NP	5.48	NP	NM
MW-20	NM	NM		6/22/09	NP	2.05	NP	NM
				11/19/19	NP	2.83	NP	NM
MW-21	NM	NM		6/22/09	NP	5.25	NP	NM
MW-22	NM	NM		6/22/09	NP	5.78	NP	NM
MW-23	NM	NM		6/22/09	NP	5.48	NP	NM
				11/16/09	5.83	7.75	1.92	NM
				5/28/10	5.42	5.77	0.35	NM
MW-24	NM	NM		11/16/09	5.78	7.69	1.91	NM
				1/13/10	5.66	9.74	4.08	NM
				5/28/10	6.66	10.74	4.08	NM
MW-25	NM	NM		6/23/09	NP	5.62	NP	NM
				11/16/09	NP	6.30	NP	NM
				1/13/10	NP	6.69	NP	NM
MW-26	NM	NM		6/22/09	NP	5.18	NP	NM
				11/16/09	NP	5.68	NP	NM
				1/13/10	NP	5.66	NP	NM
MW-27	NM	NM		11/16/09	NP	5.66	NP	NM
				1/13/10	NP	5.68	NP	NM
MW-28	NM	NM		11/16/09	NP	5.70	NP	NM
				1/13/10	NP	5.68	NP	NM
RW-2	NM	NM		6/6/07	5.92	5.92	NP	NM
				2/21/08	6.55	7.4	0.85	NM
				3/20/08	6.35	6.7	0.35	NM
				5/1/08	5.65	5.71	0.06	NM
				7/16/08	5.62	5.92	0.3	NM
				10/15/08	5.96	6.64	0.68	NM

Footnotes on Page 5.

Table 10. Summary of Static Groundwater Elevation Data and LNAPL Thickness, Former Meritor Facility, Oshkosh, Wisconsin.

Well	Ground Surface Elevation (ft msl)	Top-of-Casing Elevation (ft msl)	Screened Interval (ft msl)	Measurement Date	Depth to LNAPL (feet)	Depth to Water (feet)	LNAPL Thickness (feet)	Water Level Elevation (ft msl)
RW-2 (continued)				12/1/08	6.25	7.18	0.93	NM
				2/10/09	6.24	8.28	2.04	NM
				4/1/09	5.82	6.14	0.32	NM
				6/19/09	5.84	6.36	0.52	NM
				11/16/09	6.04	6.53	0.49	NM
				1/13/10	6.24	7.11	0.87	NM
				5/28/10	5.18	6.01	0.83	NM
RW-3	NM	NM		6/6/07	5.49	5.49	NP	NM
				2/21/08	6.55	7.04	0.49	NM
				3/20/08	5.9	6.35	0.45	NM
				5/1/08	5.15	5.47	0.32	NM
				7/16/08	5.28	5.53	0.25	NM
				10/15/08	5.71	6.08	0.37	NM
				12/1/08	6.15	6.79	0.64	NM
				2/10/09	6.1	6.91	0.81	NM
				4/1/09	5.16	5.63	0.47	NM
				6/19/09	5.72	6.08	0.36	NM
			1/13/10	6.50	6.99	0.49	NM	
RW-4	NM	NM		6/6/07	NP	5.24	NP	NM
				2/21/08	NP	8.24	NP	NM
				3/20/08	NP	5.75	NP	NM
				5/1/08	NP	4.93	NP	NM
				7/16/08	NP	5.02	NP	NM
				10/15/08	NP	5.47	NP	NM
				12/1/08	NP	6.0	NP	NM
				2/10/09	NP	5.95	NP	NM
				4/1/09	NP	4.95	NP	NM
				6/19/09	NP	5.50	NP	NM
RW-5	NM	NM		6/6/07	5.5	5.5	NP	NM
				2/21/08	6.33	7.32	0.99	NM
				3/20/08	5.92	6.35	0.43	NM
				5/1/08	5.17	5.5	0.33	NM
				7/16/08	5.28	5.49	0.21	NM
				10/15/08	5.74	5.93	0.19	NM
				12/1/08	6.25	6.63	0.38	NM
				2/10/09	6.23	7.25	1.02	NM
				4/1/09	5.13	5.56	0.43	NM
				6/19/09	5.75	6.35	0.6	NM
				11/16/09	5.98	6.29	0.31	NM
				1/13/10	6.33	7.07	0.74	NM
			5/28/10	5.38	5.65	0.27	NM	

\* Final groundwater elevation has taken into account LNAPL thickness with specific gravity of 0.87.

ft msl Feet above mean sea level.

LNAPL Light non-aqueous phase liquid.

NM Not measured.

NP No product.



SOURCE  
PROPERTY

General Dynamics Armament and Technical Products, Inc.  
Attn: Gary Kjelleren  
128 Lakeside Avenue  
Burlington, Vermont 05401

ARCADIS  
126 North Jefferson Street  
Suite 400  
Milwaukee  
Wisconsin 53202  
Tel 414.276.7742  
Fax 414.276.7603  
[www.arcadis-us.com](http://www.arcadis-us.com)

Subject:

Notice of Request for Project Closure, Former Meritor Facility, Oshkosh, Wisconsin.

ENVIRONMENT

Dear Mr. Kjelleren:

ARCADIS was retained by Meritor Heavy Vehicle Systems, LLC (ArvinMeritor) to conduct soil and groundwater investigation activities at the subject property identified with Parcel Identification Number 05-761-0000 (see attached warranty deed). Based on the results of the investigation activities, ARCADIS has prepared a request for project closure. The closure request includes a summary report and completed Wisconsin Department of Natural Resources (WDNR) Forms 4400-202, 4400-245 and 4400-246. A copy of the closure documents is enclosed.

Date  
28 September 2010

Contact:

Brian Maillet  
Ed Buc  
Phone:  
414.276.7742

This notice is being provided in accordance with the requirement for notification of current property owner established in WDNR Form 4400-245.

Email:

[bmaillet@arcadis-us.com](mailto:bmaillet@arcadis-us.com)  
[ebuc@arcadis-us.com](mailto:ebuc@arcadis-us.com)

Sincerely,  
ARCADIS

Our ref:

WI001016.0005

  
Brian J. Maillet  
Associate Project Manager

  
Ed Buc, PE  
Principal Engineer

Copies:

Gary Kjelleren, General Dynamics, Inc.  
David O'Connor, ArvinMeritor  
Gary A. Peters, Howard & Howard Attorneys, PLLC

Imagine the result