

November 2, 2010

Mr. Thomas M. Vigneault, PE.
Regional Enforcement Coordinator
NYS Dept of Environmental Conservation
615 Erie Boulevard West
Syracuse, NY 13204-2400

Subject: Roth Steel Consent Order D7-1015-11-04
2010 Soil and Groundwater Sampling Data

Dear Tom:

Enclosed, please find three copies of the draft field and analytical data that were collected recently at the Roth Steel Site located on Hiawatha Boulevard in Syracuse, New York. Specifically, Table 1 presents the parameters that were measured in the field and Tables 2 and 3 present the soil and groundwater analytical data, respectively. The sample locations are provided on the attached Figure 1. This work was undertaken in July 2010 in accordance with the Petroleum Investigation Work Plan Addendum dated May 12, 2010.

Also included are the tables from a report entitled "Roth Steel Site – Passero Phase II Report, November 1, 2007" which was provided to us by your Department on October 13, 2010. These data are being provided in response to an October 5, 2010 email from Karen Cahill requesting that the soil and groundwater data contained in the report be included in this package.

The May 12, 2010 Work Plan Addendum indicated that this document would propose additional sampling to address potential data gaps and to replace previously collected data of unacceptable quality. Based on the findings of the Passero Report and the identification of elevated levels of PCBs at the Site, additional data collection is being proposed as follows:

- A new groundwater monitoring well would be installed in the vicinity of the railroad spur (Figure 1), subject to any constraints due to buried utilities, to replace MW-8 that has been recently destroyed.
- Hydraulic conductivities would be estimated for the new well and previously installed MW-10, -11, -12, and -13 since previously collected slug test data were found to be inconclusive.
- At two locations (Figure 1) Geoprobe® soil borings and/or test pits would be initiated and continued progressively away based on visual evidence of staining. The first location near Cells 1 and 2 was selected in response to the Passero data (their Well-11) which shows fuel oil and a PCB concentration that exceeds its solubility in water. The second location between MW-7 and MW-12 was selected to further investigate the extent of PCBs that were found in the "pond" area. The goal would be to delineate the extent of the fuel oil and associated stained soil. Representative samples of stained and adjacent soil with elevated PID readings would be

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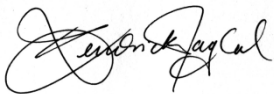
sampled and submitted for analysis of the same suite of chemicals identified in the approved Petroleum Investigation Work Plan.

Regarding data quality, the majority of rejected data were for groundwater samples and all groundwater wells have been re-sampled. In retrospect, the few soil data rejected in the Draft DUSR appears to have been very conservatively rejected without a very convincing basis. In addition, it does not appear that re-sampling soil in those particular areas would significantly add any more useful information at this time. For example, PCB Aroclor 1260 was rejected in some cases but this Aroclor has never been detected at the site. PCBs that were observed were of different Aroclors. As another example, calcium data in soil were also rejected but since it is present at percent levels, it is not necessary to re-sample to confirm that there are significant quantities of calcium at the Site.

Once funding approval is obtained from the Roth Board of Directors, the work would be scheduled. The goal would be to have the data available for incorporation into the Revised Draft Site Investigation Report by the July 2011 target. Your Department would be apprised as soon as a firm schedule has been established.

As always, thank you for your ongoing assistance on this project. Please contact me with any questions.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Kendrick Jaglal". The signature is fluid and cursive, with the first name "Kendrick" being more prominent than the last name "Jaglal".

Kendrick Jaglal, P.E.
Project Manager

Cc: George Stanton, Roth Steel Corporation

TABLE 1
Roth Steel Site - Syracuse, NY

DRAFT

Wells	Date	Field Parameters						
		pH	Temperature	Specific Conductivity	Turbidity	Dissolved Oxygen	Groundwater Elevation	Hydraulic Conductivity
			°C	mS/cm	NTU	mg/L	feet	cm/s x10 ⁻³
MW-01	Sep-08	11.8	17	3.80	106.0	7.80	369.60	0.55
	Jul-10	7.4	21	5.20	5.5	1.23	369.89	
	Oct-10						370.34	
MW-02	Sep-08	11.4	14	1.60	140.0	8.30	369.65	2.54
	Jul-10	8.0	17	1.67	15.9	0.71	369.80	
	Oct-10						369.93	
MW-03	Sep-08	12.6	15	11.00	61.0	5.30	369.71	6.38
	Jul-10	8.7	18	3.22	7.9	0.69	369.59	
	Oct-10						369.27	
MW-04	Sep-08	12.7	13	9.80	31.0	7.50	369.75	1.45
	Jul-10	12.4	14	7.97	2.2	0.51	370.03	
	Oct-10						370.29	
MW-05	Sep-08	7.6	17	2.60	50.0	11.00	369.63	2.50
MW-06	Sep-08	12.6	13	7.50	220.0	14.00	369.64	3.95
	Jul-10	12.1	15	5.59	0.8	1.44	370.03	
	Oct-10						370.32	
MW-07	Oct-08	7.1	18	2.29	283.0	0.29	369.93	
	Jul-10	7.1	21	2.74	299.0	1.39	370.18	1.15
	Oct-10						370.96	
MW-08	Oct-08	7.4	16	1.87	1.9	0.31	366.30	
	Jul-10	7.7	19	1.63	1.9	1.91	366.94	31.8
MW-09	Oct-08	12.3	15	4.54	1.6	0.33	365.89	
	Jul-10	12.0	19	6.43	4.9	1.17	365.98	0.36
	Oct-10						366.79	
MW-10	Jul-10	8.8	18	6.10	16.9	0.88	368.43	ID
	Oct-10						368.58	
MW-11	Jul-10	10.2	19	1.77	33.0	4.65	368.38	ID
	Oct-10						368.61	
MW-12	Jul-10	9.0	20	2.60	50.9	0.57	368.51	ID
	Oct-10							
MW-13	Jul-10	8.1	16	1.47	30.4	0.70	368.44	ID
	Oct-10							

Notes:

- ID Inconclusive data
- NTU Nephelometric turbidity units

TABLE 2
Roth Steel Site - Syracuse, NY
July 2010 Soil Sampling Results

Location	B46 Dup	B46	B41	B48	B40	B47	B38	B42	B39	B45	B43	MW-12	MW-12	B37	B37	B44	MW-10	MW-10	MW-13	MW-11	MW-11	B37																	
Interval	(0 - 1)	(0 - 1)	(0 - 1)	(0 - 1)	(0 - 1)	(0 - 1)	(0 - 1)	(0 - 1)	(0 - 1)	(0 - 1)	(0 - 1)	(4 - 6)	(8 - 10)	(0 - 2)	(5 - 7)	(0 - 1)	(6 - 8)	(0 - 2)	(2 - 4)	(0 - 2)	(10 - 12)	(2 - 4)																	
Methyl tert-Butyl Ether	U	U	U	U	U	U	U	U	U	U	U	0.0074	U	0.04	0.067	U	0.0035	J	U	U	U	U	0.45																
Methylcyclohexane	0.0087	J	0.0051	J	U	U	U	U	0.023	U	U	0.011	0.0036	J	1.7	0.0029	J	U	U	U	U	U	U																
Methylene Chloride	0.035	0.024	0.16	0.018	0.023	0.019	0.018	0.018	0.012	0.014	0.016	0.015	0.013	0.021	0.009	0.012	0.0068	0.014	0.017	0.01	0.012	0.08	J																
Styrene	U	U	0.11	U	0.011	U	U	U	U	U	U	U	U	0.026	U	U	U	0.0046	J	U	U	U	U																
Tetrachloroethene	U	U	U	U	U	U	U	U	U	U	U	U	U	0.014	U	U	U	U	U	U	U	U	U																
Toluene	0.017	0.0093	0.25	0.0035	0.011	U	0.0026	U	0.033	0.0024	J	U	U	1.1	U	U	U	U	U	U	U	U	U																
trans-1,2-Dichloroethene	U	U	U	U	U	U	U	U	U	U	U	U	U	0.025	U	U	U	U	U	U	U	U	U																
trans-1,3-Dichloropropene	U	U	U	U	U	U	U	U	U	U	U	U	U	0.0051	U	U	U	U	U	U	U	U	U																
Trichloroethene	U	U	U	U	U	U	U	U	U	U	U	U	U	0.03	U	U	U	U	U	U	U	U	U																
Trichlorofluoromethane	U	U	0.035	J	U	0.028	U	0.0038	J	U	0.11	0.0025	J	U	U	U	U	U	U	U	U	U	U																
Vinyl chloride	U	U	0.02	J	U	U	U	U	U	U	U	U	U	0.036	U	U	U	U	U	U	U	U	U																
Xylenes, total	0.11	0.065	0.43	0.0075	J	0.013	0.0026	J	0.0053	J	U	0.099	0.0025	J	U	U	U	U	U	U	U	U	U																
METALS (mg/kg)																																							
Aluminum	6700	9080	9760	4910	3590	2630	3080	3590	4930	2050	6900	8120	2590	2020	5910	3810	6460	4850	6810	3080	5040	5730																	
Antimony	15.8	J	13.0	J	21.1	J	6.8	J	1.0	J	1.3	J	19.1	1.4	J	9.3	J	0.6	2.5	J	3.0	J	1.8	J	2.9	J	12.8	J	7.9	J	33.7	4.2	J	0.7	0.9	J	0.9	4.8	J
Arsenic	9.5	8.6	8.2	6.1	2.7	3.4	4.8	3.8	8.9	3.2	6.0	11.4	6.0	3.0	16.1	4.7	8.4	5.9	5.2	3.2	3.2	J	10.9																
Barium	466	417	660	430	114	140	148	154	406	53.7	211	315	765	86.8	564	194	272	201	87.4	564	37.3	481																	
Beryllium	0.233	J	0.193	J	0.306	J	0.210	J	0.396	0.310	0.282	0.311	0.198	J	0.343	0.358	0.484	0.154	J	0.287	0.468	0.285	0.235	J	0.302	0.642	0.365	0.411	0.309										
Cadmium	32.7	32.2	27.4	7.80	0.789	1.90	4.94	2.66	22.9	0.492	3.49	10.6	1.34	1.91	3.64	3.83	4.07	10.1	0.740	0.587	0.217	J	4.34																
Calcium	123000	84700	171000	105000	322000	257000	206000	206000	127000	293000	176000	12500	91100	246000	111000	188000	49400	198000	135000	238000	264000	46800																	
Chromium	102	87.5	120	101	16.7	69.8	43.2	22.6	98.8	23.6	34.6	56.9	28.8	35.2	44.3	78.0	104	47.1	6.85	11.9	7.18	52.1																	
Cobalt	20.7	14.6	18.1	8.58	3.25	4.21	5.72	4.93	17.3	3.04	5.77	12.7	1.92	4.39	8.39	6.00	7.31	9.03	5.45	4.40	2.44	8.11																	
Copper	735	1070	819	1290	26.8	141	194	99.6	513	24.0	1230	278	51.0	131	473	554	4840	363	41.0	29.6	10.2	506																	
Iron	71200	83600	57600	81100	10300	17300	34700	18600	94900	7330	20300	55600	13300	46400	38100	32900	32100	68600	6780	9220	5420	23900																	
Lead	1050	1050	1370	645	42.0	167	873	275	1130	28.5	120	662	165	212	650	357	4650	335	41.4	64.5	15.5	639																	
Magnesium	11300	9530	21500	8660	56800	27700	30900	26600	24600	19400	22600	2490	6150	33500	39100	21300	3530	20500	7660	37700	28000	10800																	
Manganese	584	586	665	785	201	246	399	362	663	222	333	347	165	386	553	371	251	427	231	282	180	330																	
Mercury	3.77	2.64	6.77	1.33	0.0613	0.314	0.913	0.255	2.39	0.0348	0.0469	0.280	11.7	0.229	0.395	0.144	5.74	1.06	3.88	0.111	0.178	0.600																	
Nickel	163	163	116	81.8	13.1	20.4	41.8	40.9	163	12.1	30.4	228	17.2	31.1	320	49.8	255	52.4	12.2	13.7	6.02	J	119																
Potassium	777	597	929	632	1030	749	764	874	580	765	800	1080	474	580	1120	505	593	719	959	1440	251	986																	
Selenium	U	0.6	U	U	U	0.4	0.4	U	U	0.4	0.9	J	0.8	J	U	U	0.5	J	5.9	U	U	0.6	J																
Silver	3.01	97.6	4.40	1.57	0.188	J	1.28	0.797	0.648	1.53	0.134	J	0.733	1.01	0.456	J	0.779	1.36	0.774	1.40	1.64	U	1.43																
Sodium	1180	1110	1860	898	305	623	440	342	733	158	J	299	1510	929	336	838	603	1130	592	567	230	1160	946																
Thallium	0.8	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	U	1.1	J	0.4	J	U	U															
Vanadium	20.7	23.2	24.6	16.3	13.0	14.0	13.1	20.3	23.8	30.1	98.6	29.6	4.52	9.19	12.3	11.2	15.8	12.1	19.9	9.45	8.24	18.7																	
Zinc	7060	B	8910	12800	2290	235	6920	1440	837	4270	185	1110	900	889	979	1470	2420	3230	3010	49.1	165	41.5	891																

TABLE 3
Roth Steel Site - Syracuse, NY
July 2010 Groundwater Sampling Results

DRAFT

CHEMICAL	MW-12	MW-3	MW-10	PW-1 (Pond water)	MW-13	MW-1	MW-6	MW-4	MW-4	MW-2	MW-7	MW-8	MW-9	MW-11
PCBS (ug/L)														
Aroclor 1016	U	U			U	U	U	U	U	U	U	U	U	U
Aroclor 1221	U	U			U	U	U	U	U	U	U	U	U	U
Aroclor 1232	U	U			U	U	U	U	U	U	U	U	U	U
Aroclor 1242	0.57	U	0.20 J	0.17 J	U	U	U	U	U	U	0.73	U	U	U
Aroclor 1248	U	U			U	U	U	U	U	U	U	U	U	U
Aroclor 1254	4.4	U			U	U	U	U	U	U	U	U	U	U
Aroclor 1260	U	U			U	U	U	U	U	U	U	U	U	U
Aroclor 1262	U	U			U	U	U	U	U	U	U	U	U	U
Aroclor 1268	U	U			U	U	U	U	U	U	U	U	U	U
Total PCBs	4.97	U	0.20 J	0.17 J	U	U	U	U	U	U	0.73	U	U	U
GLYCOLS (mg/L)														
Diethylene glycol	U	U	U	U	U	U	U	U	U	U	U	U	U	U
Ethylene Glycol	U	U	U	U	U	U	U	U	U	U	U	U	U	U
Propylene glycol	U	U	U	U	U	U	U	U	U	U	U	U	U	U
SVOCs (ug/L)														
2,2'-Oxybis(1-Chloropropane)	U	U	U	U	U	U	U	U	U	U	U	U	U	U
2,4,5-Trichlorophenol	2.3 J	U	U	U	U	U	U	U	U	U	U	U	U	U
2,4,6-Trichlorophenol	1.3 J	U	U	U	U	U	U	U	U	U	U	U	U	U
2,4-Dichlorophenol	4.4 J	U	U	U	U	U	U	U	U	U	U	U	U	U
2,4-Dimethylphenol	26	5.6	27	U	U	U	3.6 J	0.78 J	1.0 J	U	U	U	U	4.4 J
2,4-Dinitrophenol	U	10	9.9	U	U	U	U	U	U	U	U	U	U	U
2,4-Dinitrotoluene	U	U	U	U	U	U	U	U	U	U	U	U	U	U
2,6-Dinitrotoluene	U	U	U	U	U	U	U	U	U	U	U	U	U	U
2-Chloronaphthalene	U	U	U	U	U	U	U	U	U	U	U	U	U	U
2-Chlorophenol	U	U	U	U	U	U	U	U	U	U	U	U	U	U
2-Methylnaphthalene	3.6 J	0.63 J	2.6 J	U	U	U	U	U	U	U	U	U	1.2	4.4 J
2-Methylphenol	15	9.7	16	U	U	U	5.4	0.62 J	0.68 J	U	U	U	U	3.5 J
2-Nitroaniline	U	U	U	U	U	U	U	U	U	U	U	U	U	U
2-Nitrophenol	U	U	U	U	U	U	U	U	U	U	U	U	U	U
3,3'-Dichlorobenzidine	U	U	U	U	U	U	U	U	U	U	U	U	U	U
3-Nitroaniline	U	U	U	U	U	U	U	U	U	U	U	U	U	U
4,6-Dinitro-2-methylphenol	U	10	U	U	U	U	U	U	U	U	U	U	U	U
4-Bromophenyl phenyl ether	U	U	U	U	U	U	U	U	U	U	U	U	U	U
4-Chloro-3-methylphenol	U	U	U	U	U	U	U	U	U	U	U	U	U	U
4-Chloroaniline	U	U	U	U	U	U	U	U	U	U	U	U	U	U
4-Chlorophenyl phenyl ether	U	U	U	U	U	U	U	U	U	U	U	U	U	U
4-Methylphenol	56	23	34	U	U	U	10	5.0 J	4.7 J	U	U	U	1.6 J	9.3 J
4-Nitroaniline	U	U	U	U	U	U	U	U	U	U	U	U	U	U
4-Nitrophenol	U	U	U	U	U	U	U	U	U	U	U	U	U	U
Acenaphthene	U	1.2 J	1.2 J	U	U	U	U	U	U	U	U	U	1.0 J	4.9 J
Acenaphthylene	U	5.2	U	U	U	U	U	U	U	U	U	U	U	0.87 J
Acetophenone	3.9 J	3.2 J	5.1	5.4	U	U	U	0.72 J	0.82 J	U	U	U	U	U
Anthracene	0.48 J	0.56 J	0.55 J	U	U	U	U	0.72 J	0.59 J	U	U	U	0.72 J	1.9 J
Atrazine	U	U	U	U	U	U	U	U	U	U	U	U	U	U
Benzaldehyde	U	U	U	U	U	U	U	U	U	U	U	U	U	U
Benzo[a]anthracene	U	U	U	U	U	U	U	U	U	U	U	U	U	U
Benzo[a]pyrene	U	U	U	U	U	U	U	U	U	U	U	U	U	U
Benzo[b]fluoranthene	U	U	U	U	U	U	U	U	U	U	U	U	U	U
Benzo[g,h,i]perylene	U	U	U	U	U	U	U	U	U	U	U	U	U	U
Benzo[k]fluoranthene	U	U	U	U	U	U	U	U	U	U	U	U	U	U

TABLE 3
Roth Steel Site - Syracuse, NY
July 2010 Groundwater Sampling Results

DRAFT

CHEMICAL	MW-12	MW-3	MW-10	PW-1 (Pond water)	MW-13	MW-1	MW-6	MW-4	MW-4	MW-2	MW-7	MW-8	MW-9	MW-11
Biphenyl	U	U	U	U	U	U	U	U	U	U	U	U	U	0.88 J
Bis(2-chloroethoxy)methane	U	U	U	U	U	U	U	U	U	U	U	U	U	U
Bis(2-chloroethyl)ether	U	U	U	U	U	U	U	U	U	U	U	U	U	U
Bis(2-ethylhexyl) phthalate	4.5 J	U	U	2.3 J	U	U	U	U	U	U	U	U	U	U
Butyl benzyl phthalate	2.7 J	U	U	U	U	U	U	U	U	U	U	U	U	U
Caprolactam	U	U	U	U	U	U	U	U	U	U	U	U	U	U
Carbazole	U	1.2 J	1.2 J	U	U J	U	0.44 J	U J	0.73 J	U	U	U	3.2 J	11
Chrysene	U	U	U	U	U	U	U	U	U	U	U	U	U	U
Dibenz[a,h]anthracene	U	U	U	U	U	U	U	U	U	U	U	U	U	U
Dibenzofuran	U	U	0.58 J	U	U	U	U	U	U	U	U	U	1.3 J	3.4 J
Diethyl phthalate	1.8 J	U	0.93 J	1.8 J	U	U	U	U	U	U	U	U	U	U
Dimethyl phthalate	U	U	U	U	U	U	5.0	U	U	U	U	U	U	U
Di-n-butyl phthalate	4.5 J	U	1.5 J	1.8 J	0.95 J	1.2 J	0.65 J	0.92 J	0.94 J	0.79 J	0.81 J	0.84 J	0.91 J	U
Di-n-octyl phthalate	U	U	U	U	1.3 J	U	U	U	U	U	U	U	U	U
Fluoranthene	0.82 J	0.77 J	0.45 J	U	0.50 J	U	0.46 J	0.53 J	0.61 J	U	0.44 J	U	U	1.7 J
Fluorene	0.69 J	1.3 J	1.0 J	U	0.38 J	U	U	0.59 J	U	U	U	U	2.8 J	4.6 J
Hexachlorobenzene	U	U	U	U	U	U	U	U	U	U	U	U	U	U
Hexachlorobutadiene	U	U	U	U	U	U	U	U	U	U	U	U	U	U
Hexachlorocyclopentadiene	U	U	U	U	U	U	U	U	U	U	U	U	U	U
Hexachloroethane	U	U	U	U	U	U	U	U	U	U	U	U	U	U
Indeno[1,2,3-cd]pyrene	U	U	U	U	U	U	U	U	U	U	U	U	U	U
Isophorone	U	U	U	U	U	U	U	U	U	U	U	U	U	U
Naphthalene	7.5	2.7 J	5.2	U	1.2 J	0.83 J	5.3	1.0 J	1.1 J	U	U	U	2.4 J	30
Nitrobenzene	U	U	U	U	U	U	U	U	U	U	U	U	U	U
N-Nitrosodi-n-propylamine	U	U	U	U	U	U	U	U	U	U	U	U	U	U
N-Nitrosodiphenylamine	U	U	U	U	U	U	U	U	U	U	U	U	U	U
Pentachlorophenol	U	U	U	U	U	U	U	U	U	U	U	U	U	U
Phenanthrene	0.94 J	2.5 J	1.6 J	U	1.2 J	0.46 J	1.4 J	2.3 J	2.0 J	0.45 J	U	U	13	9.2
Phenol	3.6 J	8.3	14	U	U	U	4.0 J	8.9	9.3	U	U	U	U	4.0 J
Pyrene	0.37 J	0.55 J	U	U	U	U	U	0.42 J	0.46 J	U	U	U	U	1.2 J
VOCs (ug/L)														
1,1,1-Trichloroethane	U	U	U	U	U	U	U	U	U	U	U	U	U	U
1,1,2,2-Tetrachloroethane	U	U	U	U	U	U	U	U	U	U	U	U	U	U
1,1,2-Trichloroethane	U	U	U	U	U	U	U	U	U	U	U	U	U	U
1,1,2-Trichlorotrifluoroethane	U	U	U	U	U	U	U	U	U	U	U	U	U	U
1,1-Dichloroethane	U	U	U	U	U	U	U	U	U	U	U	U	U	U
1,1-Dichloroethene	U	U	U	U	U	U	U	U	U	U	U	U	U	U
1,2,4-Trichlorobenzene	U	U	U	U	U	U	U	U	U	U	U	U	U	U
1,2-Dibromo-3-chloropropane	U	U	U	U	U	U	U	U	U	U	U	U	U	U
1,2-Dibromoethane (EDB)	U	U	U	U	U	U	U	U	U	U	U	U	U	U
1,2-Dichlorobenzene	U	U	U	U	U	U	U	U	U	U	U	U	U	U
1,2-Dichloroethane	U	U	U	U	U	U	U	U	U	U	U	U	U	U
1,2-Dichloroethene, Total	U	U	U	U	U	U	U	U	U	U	U	U	U	U
1,2-Dichloropropane	U	U	U	U	U	U	U	U	U	U	U	U	U	U
1,3-Dichlorobenzene	U	U	U	U	U	U	U	U	U	U	U	U	U	U
1,4-Dichlorobenzene	U	U	U	U	U	U	U	U	U	U	U	U	U	U
2-Butanone (MEK)	U	42	170	14	U	U	U	13	13	U	U	U	4.5 J	3.6 J
2-Hexanone	U	U	3.1 J	U	U	U	U	U	U	U	U	U	U	U
4-Methyl-2-pentanone (MIBK)	55	12	57	3.2 J	U	U	U	U	U	U	U	U	U	U
Acetone	17	96	220	120	4.5 J	7.0 J	16	42	44	16	6.7 J	U	18	19
Benzene	13	90	7.5	U	0.61 J	0.85 J	2.3	2.0	1.9	0.58 J	0.79 J	U	U	0.96 J
Bromodichloromethane	U	U	U	U	U	U	U	U	U	U	U	U	U	U

TABLE 3
Roth Steel Site - Syracuse, NY
July 2010 Groundwater Sampling Results

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CHEMICAL	MW-12	MW-3	MW-10	PW-1 (Pond water)	MW-13	MW-1	MW-6	MW-4	MW-4	MW-2	MW-7	MW-8	MW-9	MW-11
Bromoform	U	U	U	U	U	U	U	U	U	U	U	U	U	U
Bromomethane	U	U	U	U	U	U	U	U	U	U	U	U	U	U
Carbon disulfide	2.6	U	U	1.5	U	U	U	U	U	U	U	U	0.82 J	U
Carbon Tetrachloride	U	U	U	U	U	U	U	U	U	U	U	U	U	U
Chlorobenzene	U	U	U	U	U	U	U	U	U	U	U	U	U	U
Chlorodibromomethane	U	U	U	U	U	U	U	U	U	U	U	U	U	U
Chloroethane	U	U	U	U	0.61 J	U	U	U	U	U	U	U	U	U
Chloroform	U	U	U	U	U	U	U	U	U	U	U	U	U	U
Chloromethane	U	U	U	U	U	U	U	U	U	0.66 J	U	U	U	U
cis-1,2-Dichloroethene	U	U	U	U	U	U	U	U	U	U	U	U	U	U
cis-1,3-Dichloropropene	U	U	U	U	U	U	U	U	U	U	U	U	U	U
Cyclohexane	U	1.9	0.55 J	U	U	U	1.4	1.1	1.0	3.2	2.2	U	U	0.58 J
Dichlorodifluoromethane	U	U	U	U	U	U	U	U	U	U	U	U	U	U
Ethylbenzene	13	5.0	6.4	U	U	0.98 J	U	2.6	2.6	U	U	U	U	U
Isopropylbenzene	1.0	U	U	U	U	U	U	0.85 J	0.86 J	U	U	U	U	U
Methyl Acetate	U	U	U	U	U	U	U	U	U	U	U	U	U	U
Methyl tert-Butyl Ether	22	13	38	U	9.6	1.7	9.5	26	27	17	0.58 J	2.6	2.5	3.8
Methylcyclohexane	0.85 J	0.60 J	U	U	U	U	U	1.6	1.6	1.3	1.8	U	U	U
Methylene Chloride	0.99 J	52	U	U	U	U	U	U	U	U	U	U	U	U
Styrene	9.0	U	2.9	U	U	U	U	U	U	U	U	U	U	U
Tetrachloroethene	U	U	U	U	U	U	U	U	U	U	U	U	U	U
Toluene	46	71	12	0.95 J	U	U	1.4	11	11	U	U	U	U	U
trans-1,2-Dichloroethene	U	U	U	U	U	U	U	U	U	U	U	U	U	U
trans-1,3-Dichloropropene	U	U	U	U	U	U	U	U	U	U	U	U	U	U
Trichloroethene	U	U	U	U	U	U	U	0.55 J	U	U	U	U	U	U
Trichlorofluoromethane	U	U	U	1.4	U	U	U	U	U	U	U	U	U	U
Vinyl chloride	4.9	1.4	U	U	U	U	U	9.5	10	U	U	U	U	U
Xylenes, total	59	29	20	U	U	U	2.7	15	15	U	U	U	U	U
Metals (mg/L)														
Aluminum	1.23	U	0.0970 J	0.17 J	0.456	0.2	0.2	0.137 J	0.08 J	0.222	2.2	U	U	0.227
Antimony	U	U	0.0076 J	0.01 J	U	U	0.02	U	U	U	U	U	U	U
Arsenic	0.01 J	U	0.0154	U	U	U	0.01	U	U	U	U	0.0079 J	U	U
Barium	1.23	1.94	1.7600	0.54	0.0496	1.09	0.245	0.223	0.231	1.67	3.15	0.0408	0.108	0.576
Beryllium	U	U	0.0003 J	U	U	0.0004 J	0.0003 J	0.0003 J	0.0004 J	U	0.0003 J	U	0.0003 J	U
Cadmium	0.0016	U	U	0.0006 J	U	U	U	U	U	U	0.0064	U	U	U
Calcium	16.20	191	532.00	64.70	39.5	351	567	740	780	59.8	166	65.3	668	110
Chromium	0.0065	U	0.0040	0.0013 J	U	U	0.0021 J	U	U	0.0016 J	0.0154	U	U	U
Cobalt	0.0011 J	U	0.0040	0.0008 J	U	U	U	U	0.0006 J	0.0015 J	0.003 J	U	U	U
Copper	0.0354	U	0.0032 J	0.0180	0.0045 J	0.0023 J	0.0044 J	0.0023 J	0.0023 J	0.0056 J	0.243	0.0029 J	0.0024 J	0.0047 J
Iron	2.5000	1.13	0.0700	1.3200	0.246	1.99	U	0.035 J	0.023 J	9.22	16.9	0.096	0.042 J	2.03
Lead	0.1020	U	0.0072	0.0342	0.0049 J	U	U	U	U	0.0056	0.239	U	U	0.0115
Magnesium	9.1800	122	68.50	45.70	13.3	555	U	0.552	0.27	19.6	112	55.1	0.098 J	19.4
Manganese	0.0258	0.0775	0.0035	0.08	0.0209	0.315	0.0008 J	0.0003 J	0.0002 J	0.0501	0.239	0.0264	0.0004 J	0.0707
Mercury	0.0002	0.0002	0.0001 J	U	0.0006	0.0001 J	0.0003	U	U	0.0001 J	0.0007	0.0001 J	0.0009	U
Nickel	0.0169	0.0045 J	0.0241	0.02	0.0062 J	0.0104	0.0013 J	0.0141	0.0143	0.0061 J	0.0422	0.0039 J	0.0018 J	0.0062 J
Potassium	79.10	51.6	90.90	67.20	30.1	59.2	30.6	35.1	36.7	53.6	40.8	30.3	33.3	49.1
Selenium	U	U	U	U	U	U	U	U	U	U	U	U	U	U
Silver	U	U	U	U	U	U	U	U	U	U	U	U	U	U
Sodium	549	229	696	392	251	180	214	225	234	228	209	203	264	287
Thallium	U	U	U	U	U	U	U	U	U	U	U	U	U	U
Vanadium	0.0029 J	U	U	U	0.002 J	U	0.0028 J	U	U	0.0024 J	0.006	U	U	0.0012 J
Zinc	0.3000	0.0062 J	0.0076 J	0.24	0.0178	0.0189	U	0.0062 J	0.0045 J	0.0141	1.3	0.0024 J	0.0044 J	0.0113

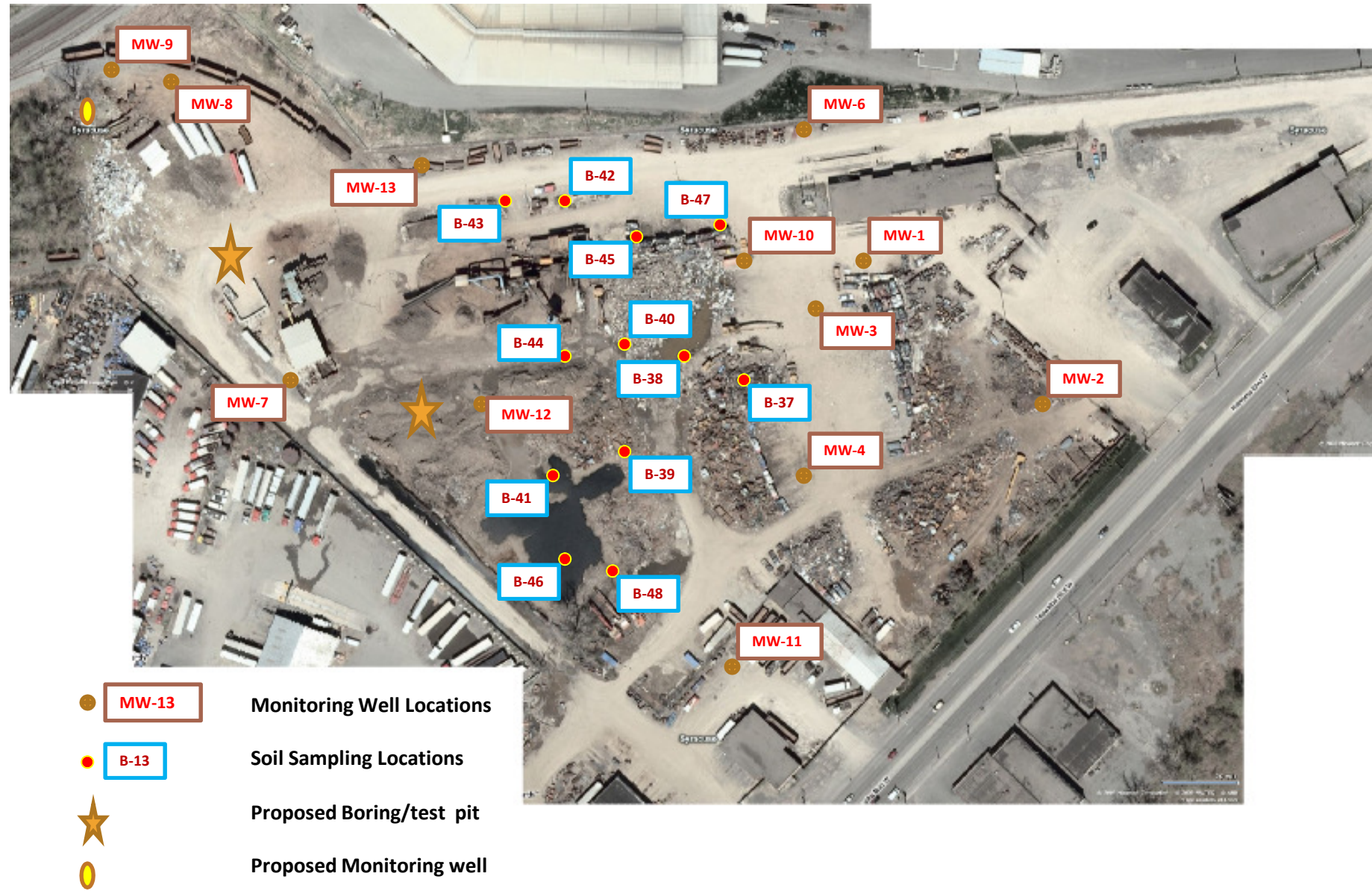


FIGURE 1. Roth Steel 2010 and Proposed Sampling Locations

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Roth Steel
Table 1 Soil September 28, 2007

VOCs												
Compound	BH-1 0'-4' (ppm)	BH-1 4'-8' (ppm)	BH-2 0'-4' (ppm)	BH-2 4'-8' (ppm)	BH-3 0'-4' (ppm)	BH-3 4'-8' (ppm)	BH-4 0'-4' (ppm)	BH-4 4'-8' (ppm)	BH-5 0'-4' (ppm)	BH-5 4'-8' (ppm)	TAGM 4046 Table 1 Rec. SCO (ppm)	Table 375 Restricted Industrial SCOs (ppm)
Trichloroethene	ND	ND	0.028	0.03	ND	0.03	ND	ND	0.02	ND	0.7	400
Toulene	ND	ND	0.027	0.04	ND	0.04	ND	ND	ND	ND	1.5	1,000
Acetone	ND	0.16	0.43	ND	0.48	0.13	0.12	0.23	ND	ND	0.2	1,000
Carbon disulfide	ND	ND	ND	0.02	0.01	0.01	ND	0.04	ND	ND	2.7	NA

ppm: Parts per million.
SCOs: Soil clean up objectives.
ND: Non-detect.
NA: Not Available.

Roth Steel
Table 2 Soil September 28, 2007

PCBs												
Compound	BH-1 0'-4' (ppm)	BH-1 4'-8' (ppm)	BH-2 0'-4' (ppm)	BH-2 4'-8' (ppm)	BH-3 0'-4' (ppm)	BH-3 4'-8' (ppm)	BH-4 0'-4' (ppm)	BH-4 4'-8' (ppm)	BH-5 0'-4' (ppm)	BH-5 4'-8' (ppm)	TAGM 4046 Table 3 Rec. SCO (ppm)	Table 375 Restricted Insutrial SCOs (ppm)
Aroclor 1260	ND	ND	ND	ND	ND	ND	ND	ND	0.006	ND	1	25

ppm: Parts per million.
SCOs: Soil clean up objectives.
ND: Non-detect.
NA: Not Available.

Roth Steel
Table 3 Groundwater September 28, 2007

Compounds	VOCs					TOGS 1,1,1 ug/L
	GW-1 ug/L	GW-2 ug/L	GW-3 ug/L	GW-4 ug/L	GW-5 ug/L	
Trichlorofluoromethane	ND	ND	ND	4.99	ND	5
Benzene	ND	ND	ND	2.01	ND	1
Acetone	15.9	ND	ND	23.3	ND	50

ND: Non-detect.
TOGS: Technical and Operational Guidance Series.

Roth Steel
Table 4 Groundwater September 28, 2007

Compounds	PCBs					TOGS 1,1,1 ug/L
	GW-1 ug/L	GW-2 ug/L	GW-3 ug/L	GW-4 ug/L	GW-5 ug/L	
Aroclor 1254	ND	ND	ND	4.11	ND	0.09

ppm: Parts per million.
ND: Non-detect.
TOGS: Technical and Operational Guidance Series.

Roth Steel
Table 5 Soil October 11, 2007

Compound	VOCs										TAGM 4046 Table 1 Rec. SCO (ppm)	Table 375 Restricted Industrial SCO (ppm)
	BH-6 0'-4' (ppm)	BH-8 7'-8' (ppm)	BH-9 0'-12' (ppm)	BH-10 4'-8' (ppm)	BH-11 0'-4' (ppm)	BH-12 0'-8' (ppm)	TP-13 4' (ppm)	TP-14 4' (ppm)	BH-15 7'-8' (ppm)			
Tetrachloroethene	0.011	ND	ND	0.020	ND	ND	ND	ND	ND	ND	1.4	300
Trichloroethene	ND	0.010	ND	ND	ND	ND	ND	ND	ND	ND	0.7	400
Trichlorofluoromethane	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA	NA
Benzene	0.021	0.013	ND	ND	ND	ND	ND	ND	ND	ND	0.06	89
Ethylbenzene	0.065	0.139	ND	ND	0.017	ND	0.091	ND	ND	ND	5.5	780
Toluene	0.11	0.026	ND	0.020	0.012	ND	0.012	ND	ND	ND	1.5	1,000
m,p-Xylene	0.087	0.463	ND	0.059	0.016	ND	0.018	ND	ND	ND	1.2	1,000
o-Xylene	0.054	0.219	ND	0.033	0.012	ND	0.014	0.010	ND	ND	1.2	1,000
Styrene	0.055	ND	ND	ND	ND	ND	0.048	ND	ND	ND	NA	NA
1,4-Dichlorobenzene	0.011	ND	ND	ND	ND	ND	ND	ND	ND	ND	8.5	250
Acetone	1.730	0.357	0.069	ND	0.341	0.058	0.165	ND	ND	0.058	0.2	1,000
2-Butanone	0.373	ND	ND	ND	0.086	ND	ND	ND	ND	ND	0.3	NA
4-Methyl-2-pentanone	1.090	ND	ND	ND	0.030	ND	ND	ND	ND	ND	1.0	NA
Carbon disulfide	0.084	0.058	0.025	0.031	0.017	0.061	ND	0.009	ND	ND	2.7	NA
sec-Butylbenzene	ND	0.135	ND	ND	ND	ND	ND	ND	ND	ND	NA	1,000
n-Propylbenzene	0.009	0.202	ND	ND	ND	ND	ND	ND	ND	ND	NA	1,000
Isopropylbenzene	ND	0.149	ND	ND	ND	ND	ND	ND	ND	ND	NA	NA
p-Isopropyltoluene	ND	0.234	ND	ND	ND	ND	ND	0.041	ND	ND	NA	NA
Naphthalene	0.051	0.278	ND	ND	0.046	ND	ND	ND	ND	ND	NA	NA
1,2,4-Trimethylbenzene	0.043	1.960	ND	0.068	0.018	ND	0.010	0.015	ND	ND	NA	380
1,3,5-Trimethylbenzene	0.016	0.746	ND	0.031	ND	ND	ND	0.017	ND	ND	NA	380
Methyl tert-butyl Ether	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA	1,000

Roth Steel

Table 5 (Cont'd) Soil October 11, 2007

Compound	VOCs										Table 375 Restricted Industrial SCO (ppm)		
	TP-16 (ppm)	BH-17 4 (ppm)	BH-19 7-8 (ppm)	Lagoon 1 Center (ppm)	Lagoon 2 N Access (ppm)	Lagoon Surficial (ppm)	Lagoon N Access 5 (ppm)	TAGM 4046 Table 1 (ppm)					
Tetrachloroethene	ND	ND	ND	ND	ND	0.018	ND	ND	ND	0.018	ND	1.4	300
Trichloroethene	ND	ND	ND	ND	ND	0.017	ND	ND	ND	0.017	0.0179	0.7	400
Trichlorofluoromethane	ND	ND	ND	ND	0.035	0.159	ND	ND	ND	0.159	ND	NA	NA
Benzene	ND	0.065	ND	ND	ND	0.014	ND	ND	ND	0.014	ND	0.06	89
Ethylbenzene	ND	ND	ND	0.018	0.055	0.148	0.0401	0.0572	0.0850	0.155	0.0479	5.5	780
Toluene	ND	0.211	0.017	0.009	0.080	0.214	0.0479	0.0850	0.0479	0.236	ND	1.5	1,000
m,p-Xylene	ND	0.295	0.016	0.014	0.132	0.214	0.0479	0.0850	0.0479	0.236	ND	1.2	1,000
o-Xylene	ND	0.512	ND	0.019	0.100	0.236	ND	0.0479	0.0479	0.090	ND	1.2	1,000
Styrene	ND	0.743	ND	ND	0.044	0.090	ND	ND	ND	0.090	ND	NA	NA
1,4-Dichlorobenzene	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	8.5	250
Acetone	ND	0.321	0.195	0.047	ND	0.372	0.728	0.728	0.728	0.372	0.728	0.2	1,000
2-Butanone	ND	ND	0.074	ND	ND	ND	ND	ND	ND	ND	0.161	0.3	NA
4-Methyl-2-pentanone	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.226	1.0	NA
Carbon disulfide	ND	0.021	0.017	ND	ND	0.148	0.0959	0.0959	0.0959	0.148	0.0959	2.7	NA
sec-Burylbenzene	ND	0.031	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA	1,000
n-Propylbenzene	ND	0.126	ND	ND	0.020	0.035	ND	ND	ND	0.035	ND	NA	1,000
Isopropylbenzene	ND	0.059	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA	NA
p-Isopropyltoluene	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA	NA
Naphthalene	ND	0.244	ND	ND	0.029	0.053	ND	ND	ND	0.053	ND	NA	NA
1,2,4- Trimethylbenzene	ND	0.838	0.009	0.033	0.103	0.141	0.0599	0.0599	0.0599	0.141	0.0599	NA	380
1,3,5- Trimethylbenzene	ND	0.807	ND	0.011	0.066	0.103	0.0251	0.0251	0.0251	0.103	0.0251	NA	380
Methyl tert-butyl Ether	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA	1,000

Roth Steel
Table 6 Soil October 11, 2007

Compound	SVOCs										Table 375 Restricted Industrial SCO (ppm)
	BH-6 0'-4' (ppm)	BH-8 7'-8' (ppm)	BH-9 0'-12' (ppm)	BH-10 4'-8' (ppm)	BH-11 0'-4' (ppm)	BH-12 0'-8' (ppm)	TP-13 4' (ppm)	TP-14 4' (ppm)	BH-15 7'-8' (ppm)	TAGM 4046 Table 2 Rec. SCO (ppm)	
Acenaphthene	ND	ND	ND	ND	ND	ND	ND	ND	ND	50.0	1000
Acenaphthylene	ND	ND	ND	ND	ND	ND	ND	ND	ND	41.0	1000
Anthracene	ND	ND	ND	ND	ND	ND	0.393	0.422	ND	50.0	1000
Benzo (a) anthracene	1.320	ND	ND	5.110	ND	ND	0.996	1.040	ND	0.224 or MDL	11
Benzo (a) pyrene	ND	ND	ND	4.690	ND	ND	0.575	0.705	ND	0.061 or MDL	1.1
Benzo (b) fluoranthene	0.882	ND	ND	4.560	ND	ND	0.797	0.579	ND	1.1	11
Benzo (g,h,i) perylene	ND	ND	ND	3.430	ND	ND	ND	0.352	ND	50.0	1000
Benzo (k) fluoranthene	ND	ND	ND	2.450	ND	ND	0.620	0.561	ND	1.1	110
Chrysene	1.780	ND	ND	5.150	ND	ND	0.975	0.858	ND	0.4	110
Dibenz (a,h) anthracene	ND	ND	ND	1.130	ND	ND	ND	ND	ND	0.014 or MDL	1.1
Fluoranthene	3.300	ND	ND	6.510	ND	ND	2.380	1.950	ND	50.0	1000
Fluorene	ND	ND	ND	ND	ND	ND	ND	ND	ND	50.0	1000
Indeno (1,2,3-cd) pyrene	ND	ND	ND	3.450	ND	ND	0.397	0.354	ND	3.2	11
Naphthalene	ND	ND	ND	ND	ND	ND	ND	ND	ND	13.0	1000
Phenanthrene	1.670	0.873	ND	1.870	ND	ND	1.160	1.090	ND	50.0	1000
Pyrene	ND	ND	ND	4.640	1.150	ND	1.950	1.350	ND	50.0	1000

Roth Steel
Table 6 (Cont'd) Soil October 11, 2007

Compound	SVOCs										Table 3/5 Restricted Industrial SCO (ppm)
	TP-16 (ppm)	BH-17 4 (ppm)	BH-19 7'-8' (ppm)	Lagoon 1 Center (ppm)	Lagoon 2 N Access (ppm)	Lagoon Surficial (ppm)	Lagoon N Access 5 (ppm)	TAGM 4046 Table 2 (ppm)			
Acenaphthene	0.768	0.658	ND	ND	ND	ND	ND	50.0	ND	1000	
Acenaphthylene	0.395	ND	ND	ND	ND	ND	ND	41.0	ND	1000	
Anthracene	4.350	1.330	ND	ND	ND	ND	1.500	50.0	ND	1000	
Benzo (a) anthracene	7.750	2.990	ND	ND	ND	ND	4.180	0.224 or MDL	ND	11	
Benzo (a) pyrene	5.190	1.430	ND	ND	ND	ND	3.310	0.061 or MDL	ND	1.1	
Benzo (b) fluoranthene	4.670	1.910	ND	ND	ND	ND	3.350	1.1	ND	11	
Benzo (g,h,i) perylene	2.660	1.070	ND	ND	ND	ND	1.870	50.0	ND	1000	
Benzo (k) fluoranthene	3.930	1.650	ND	ND	ND	ND	2.200	1.1	ND	110	
Chrysene	6.080	2.560	ND	ND	ND	ND	4.550	0.4	ND	110	
Dibenz (a,h) anthracene	0.638	ND	ND	ND	ND	ND	ND	0.014 or MDL	ND	1.1	
Fluoranthene	16.100	7.590	ND	ND	1.980	ND	8.360	50.0	ND	1000	
Fluorene	1.900	0.808	ND	ND	ND	ND	ND	50.0	ND	1000	
Indeno (1,2,3-cd) pyrene	2.360	1.070	ND	ND	ND	ND	1.840	3.2	ND	11	
Naphthalene	ND	0.515	ND	ND	ND	ND	ND	13.0	ND	1000	
Phenanthrene	10.600	5.990	ND	ND	1.670	ND	4.380	50.0	ND	1000	
Pyrene	11.500	5.910	ND	ND	1.720	ND	7.600	50.0	ND	1000	

Roth Steel
Table 7 Soil October 11, 2007

Compound	PCBs										Table 375 Restricted Industrial SCO (ppm)
	BH-6 0'-4' (ppm)	BH-8 7'-8' (ppm)	BH-9 0'-12' (ppm)	BH-10 4'-8' (ppm)	BH-11 0'-4' (ppm)	BH-12 0'-8' (ppm)	TP-13 4' (ppm)	TP-14 4' (ppm)	BH-15 7'-8' (ppm)	TAGM 4046 Table 3 Rec. SCO (ppm)	
Aroclor 1016	10.7	ND	ND	ND	ND	ND	3.23	1.09	ND	1 (Surface) 10 (Sub-surface)	25
Aroclor 1242	ND	ND	1.01	5.53	94.3	ND	ND	ND	ND	1 (Surface) 10 (Sub-surface)	25
Aroclor 1260	20.8	ND	ND	ND	ND	4.13	2.41	ND	ND	1 (Surface) 10 (Sub-surface)	25

Roth Steel
Table 7 (Cont'd) Soil October 11, 2007

Compound	PCBs										Table 375 Restricted Industrial SCO (ppm)
	TP-16 (ppm)	BH-17 4 (ppm)	BH-19 7'-8' (ppm)	Lagoon 1 Center (ppm)	Lagoon 2 N Access (ppm)	Lagoon Surficial (ppm)	Lagoon N Access 5' (ppm)	TAGM 4046 Table 3 Rec. SCO (ppm)			
Aroclor 1016	ND	20.3	ND	ND	ND	ND	ND	ND	ND	1 (Surface) 10 (Sub-surface)	25
Aroclor 1242	ND	ND	ND	7.35	46.1	12.1	41.3	1 (Surface) 10 (Sub-surface)e	ND	1 (Surface) 10 (Sub-surface)	25
Aroclor 1260	ND	9.17	ND	ND	ND	ND	ND	1 (Surface) 10 (Sub-surface)	ND	1 (Surface) 10 (Sub-surface)	25

Roth Steel
Table 8 Soil October 11, 2007

Compound	Metals										TAGM 4046 Table 4 Rec. SCO (ppm)	Table 375 Restricted Industrial SCO (ppm)
	BH-6 0'-4' (ppm)	BH-8 7'-8' (ppm)	BH-9 0'-12' (ppm)	BH-10 4'-8' (ppm)	BH-11 0'-4' (ppm)	BH-12 0'-8' (ppm)	TP-13 4' (ppm)	TP-14 4' (ppm)	BH-15 7'-8' (ppm)			
Arsenic	53.4	20.4	9.82	35.9	27.7	14.6	28.4	7.43	3.20	7.5 or SB	16	
Barium	3360	759	364	270	2020	3080	357	148	112	300 or SB	10,000	
Cadmium	96.5	4.52	23.7	9.92	79.0	<0.388	22.5	5.33	<0.416	1 or SB	60	
Chromium	226	79.3	181	56.5	154	140	360	197	3.79	10 or SB	800	
Lead	2850	19.30	595	864	1180	534	2440	347	14.4	SB	3,900	
Mercury	0.894	0.385	0.683	0.137	3.46	0.126	3.68	0.271	<0.0081	0.1	5.7	
Selenium	<0.593	9.12	<0.588	<0.419	6.75	<0.388	<0.536	<0.438	<0.416	2 or SB	6,800	
Silver	<1.19	<1.17	<1.18	<0.383	1.44	<0.776	1.32	2.22	<0.830	SB	6,800	

SB: site background

Roth Steel
Table 8 (Cont'd) Soil October 11, 2007

Compound	Metals									
	TP-16 (ppm)	BH-17 4 (ppm)	BH-19 7-8 (ppm)	Lagoon 1 Center (ppm)	Lagoon 2 N Access (ppm)	Lagoon Surficial (ppm)	Lagoon N Access 5' (ppm)	TAGM 4046 Table 4 (ppm)	Table 375 Restricted Industrial SCO (ppm)	
Arsenic	4.60	8.28	8.29	24.0	20.3	13.4	17.3	7.5 or SB	16	
Barium	62.0	225	140	75.4	341	461	849	300 or SB	10,000	
Cadmium	<0.341	7.38	<0.340	5.98	22.5	18.4	9.03	1 or SB	60	
Chromium	14.8	152	9.41	89.2	312	199	264	10 or SB	800	
Lead	36.6	762	13.5	392	897	881	11,300	SB	3,900	
Mercury	0.0995	1.01	0.0596	0.573	1.01	0.066	0.646	0.1	5.7	
Selenium	<0.341	<0.483	<0.340	<0.507	<0.585	<0.546	1.49	2 or SB	6,800	
Silver	<0.680	<0.967	<0.678	2.75	<1.17	3.36	15.1	SB	6,800	

SB: site background

Roth Steel
Table 9 Groundwater October 11, 2007

Compound	VOCs										Retention Tank ug/L	TOGS 111 Groundwater standard ug/L
	GW-6 ug/L	GW-7 ug/L	GW-8 ug/L	GW-9 ug/L	GW-10 ug/L	GW-11 ug/L	GW-12 ug/L	GW-15 ug/L	GW-19 ug/L			
Chloroethane	ND	ND	ND	ND	ND	524	ND	ND	ND	ND	ND	5
Tetrachloroethene	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	3.04	5
Trichlorofluoromethane	ND	ND	19.6	ND	4.99	ND	ND	ND	ND	ND	30.3	5
Benzene	ND	ND	4.98	ND	ND	ND	ND	ND	ND	44.4	5.69	1
Ethylbenzene	ND	ND	ND	ND	ND	ND	ND	ND	ND	17.7	8.03	5
Toluene	ND	ND	8.32	ND	ND	ND	ND	ND	ND	220	19.9	5
m,p-Xylene	ND	ND	ND	ND	ND	ND	ND	ND	ND	55.1	ND	NA
o-Xylene	ND	ND	ND	ND	ND	ND	ND	ND	ND	32.9	19.8	NA
Acetone	192	ND	316	ND	ND	ND	298	ND	172	181	50	50
2-Butanone	ND	ND	ND	ND	ND	ND	51.9	ND	225	51.7	NA	NA
2-Hexanone	ND	ND	ND	ND	ND	ND	ND	ND	13.2	ND	ND	50
4-Methyl-2-pentanone	363	ND	267	ND	ND	ND	ND	ND	83.1	9.58	NA	NA
Methyl tert-butyl Ether	ND	2.67	5.35	2.50	ND	ND	5.36	3.71	86.9	11.5	NA	NA

Roth Steel
Table 10 Groundwater October 11, 2007

SVOCs											
Compound	GW-6 ug/L	GW-7 ug/L	GW-8 ug/L	GW-9 ug/L	GW-10 ug/L	GW-11 ug/L	GW-12 ug/L	GW-15 ug/L	GW-19 ug/L	Retention Tank ug/L	TOGS 1.1.1 Groundwater standard ug/L
Naphalene	ND	ND	ND	ND	ND	24.2	ND	ND	ND	ND	10

Roth Steel
Table 11 Groundwater October 11, 2007

PCBs									
Compound	GW-6 ug/L	GW-7 ug/L	GW-8 ug/L	GW-9 ug/L	GW-10 ug/L	GW-11 ug/L	GW-15 ug/L	Retention Tank ug/L	TOGS 1.1.1 Groundwater standard ug/L
Aroclor 1242	78.0	ND	26.0	ND	ND	25,000	ND	36.0	0.09

Roth Steel
Table 12 Groundwater October 11, 2007

Compound	GW-11 ug/L	TOGS 1.1.1 Groundwater standard ug/L
Medium Weight PHC as: Fuel Oil #6	16,3000	NA

PHC: Petroleum Hydrocarbon