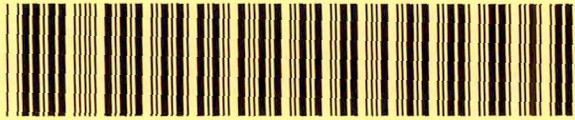


342IHSSF2211



DocumentID NONCD0002853

Site Name EATON MANUFACTURING

DocumentType Correspondence (C)

RptSegment 1

DocDate 5/12/2008

DocRcvd 5/14/2008

Box SF2211

AccessLevel PUBLIC

Division WASTE MANAGEMENT

Section SUPERFUND

Program IHS (IHS)

DocCat FACILITY



Eaton Corporation
 1111 Superior Avenue
 Cleveland Ohio, 44114
 216-523-4777

May 12, 2008

Ms. Charlotte Jesnick
 Inactive Hazardous Sites Branch Head
 NC Division of Waste Management
 401 Oberlin Road
 Suite 150
 Raleigh, NC 27605



RE: Notification of Inactive Hazardous Substance Site
 1100 East Preston Street, Selma, NC

Dear Ms. Jesnick;

Non-petroleum substances have recently become evident at property located at 1100 East Preston Street in Selma, NC. Eaton Corporation (Eaton) is enclosing a notification form that has been prepared subject to the requirements of NC General Statute 130A-310.1(b). Eaton has procured an environmental consultant and is currently developing a plan to conduct a remedial investigation.

For issues related to this site, please contact Mr. Jeff Allen at the address above or by telephone (216) 523-4777.

Yours truly,

Jeffrey Allen
 Manager, Environment and Waste
 Eaton Corporation

| | | | | | |
|-------------------|----------------|---------|----------------|------------|---|
| Post-it® Fax Note | 7671 | Date | 5-15 | # of pages | 9 |
| To | Dave Brown | From | John Walk | | |
| Co./Dept. | | Co. | | | |
| Phone | (910) 433-3359 | Phone # | (919) 508-8485 | | |
| Fax # | (910) 486-0707 | Fax # | | | |

cc: John Shallcross - Johnson County Industries, Inc.
 Lynn Rogozinski - Eaton Legal
 Barbara Oslund - Solutions IES

Notification Attached:



NOTIFICATION OF AN INACTIVE HAZARDOUS SUBSTANCE OR WASTE DISPOSAL SITE

Please read instructions before completing and type or print in black ink.

I. SITE NAME AND LOCATION:

Site Name (one site per form) Former Eaton Manufacturing Facility
Location (street address) 1100 Preston Street
City Selma US EPA ID# (if known) _____
County Johnston
Directions to Site Site is located less than 1-mile from I-95 exit 97 (see map).

Attach a USGS topographic map or map of equal or reasonably similar scale (1 inch = 2000 ft.) showing the location and vicinity of the site or facility. Label map with the site name.

II. PERSON COMPLETING FORM:

Name Jeff P. Allen
Mailing Address 1111 Superior Avenue
City Cleveland State OH Zip Code 44114-2584
Telephone (216) 523-4777

Present Owner _____
Past Owner X
Present Operator _____
Past Operator X
Other _____
(specify) _____

III. PRESENT OWNER:

Individual Owner or Company Name
Johnston County Industries, Inc.
Executive Officer Mr. John Shallcross
Mailing Address 912 North Brightleaf Boulevard
City Smithfield State NC Zip Code 27577
Telephone (919) 934-0677

Corporation X
Partnership _____
Individual _____
Government Unit _____
Other _____
(specify) _____

Voluntary Cleanup Checklist

Parties interested in volunteering should prepare this form with the assistance of an environmental consultant. All cooperative parties are eligible for Branch-approved voluntary actions. Answer all questions and provide written descriptions where needed.

NCDENR Site Name, City and County Former Eaton Manufacturing Facility, Johnston County, Selma

1. Is the site located on or immediately adjacent to residential property, schools, day-care centers or other sensitive populations? Y N
If yes, please explain on a separate page.
2. What is the distance (from site property line) to the nearest residence, school or day-care center? Please attach a site location map. 1,025 FT
3. Is the site completely surrounded by a locked fence? Y N
If no, please explain security measures at the site on a separate page.
4. Are site surface soils known to be contaminated? Y N
If yes, or unknown, describe briefly on a separate page.
5. Is site groundwater known to be contaminated? Y N
If yes, or unknown, describe briefly on a separate page.
6. Is site sediment or surface water known to be contaminated? Y N
If yes, or unknown, describe briefly on a separate page.
7. Has groundwater contamination affected any drinking water wells? Y N
If yes, or unknown, please explain on a separate page.
8. What is the distance to the nearest downgradient drinking water well? 1,000 FT
9. What is the distance to the nearest downstream surface water intake? UNKNOWN
10. Are hazardous vapors, air emissions or contaminated dust migrating into occupied residential, commercial or industrial areas? Y N
If yes, or unknown, please explain on a separate page.
11. Have hazardous substances known to have migrated off property at concentrations in excess of Branch unrestricted-use remediation goals? Y N
If yes, or unknown, please explain on a separate page.
12. Has the local community expressed concerns about contamination at the site? Y N
If yes, or unknown, please explain on a separate page.
13. Based on current information, are there any sensitive environments located on the property (sensitive environments are identified in the Remedial Investigation Work Plans section of the IHSB " Guidelines for Assessment and Cleanup "at www.wastenotnc.org/sfhome/stateleadguidance.pdf)? Y N

If yes, or unknown, please explain on a separate page.

14. Based on current information, has contamination from the site migrated into any sensitive environments? Y N

If yes, or unknown, please explain on a separate page.

15. Do site contaminants include radioactive or mixed radioactive and chemical wastes? Y N

If yes, or unknown, please explain on a separate page.

Remediating Party Certification Statement

I hereby certify that the responses provided above are, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for willfully submitting false, inaccurate or incomplete information.

Jeffrey P. Allen
(Signature of Remediating Party Representative)

5/22/08
(Date)

Jeff P. Allen, Technical Manager, Environmental Services Department
(Printed Name and Title of Remediating Party Representative)

Eaton Corporation
(Printed Name of Company)

OHIO

(State in which signature is witnessed)

CUYAHOGA County

I, LYNN RUGOZINSKI, a Notary Public of said County and State, do hereby certify that JEFF P. ALLEN did personally appear and sign before me this the 22nd day of MAY, 2008.

Lynn R. Rogozinski
Notary Public (signature)

LYNN R. RUGOZINSKI, Attny.
NOTARY PUBLIC, STATE OF OHIO
My Commission Has No Expir. Date
O.R.C. Section 147.03

(OFFICIAL SEAL)

My commission expires: NO EXPI. DATE ORC § 147.03

Environmental Consultant Certification Statement

I hereby certify that the responses provided above are, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for willfully submitting false, inaccurate or incomplete information.

Barbara L. Oslund
(Signature)

5/20/2008
(Date)

Barbara L. Oslund
(Printed Name)

Solutions-IES, Inc.
(Printed Name of Environmental Consultant)

North Carolina
(State in which signature is witnessed)

Wake County

I, Mary Jean Howard, a Notary Public of said County and State, do hereby certify that Barbara Oslund did personally appear and sign before me this the 20th day of May, 2008.

Mary Jean Howard
Notary Public (signature)

(OFFICIAL SEAL)

My commission expires: 6/17/09

VIII. ENVIRONMENTAL PERMITS:

List all previous and current environmental permits below.

| Type of Permit (e.g. landfill, nondischarge, etc.) | Past (circle one) | Present | Permit Number | Date Issued | Issuing Agency |
|---|----------------------|---------|---------------|-------------|----------------|
| | Past | Present | | | |
| | Past | Present | | | |
| | Past | Present | | | |
| | Past | Present | | | |
| | Past | Present | | | |
| | Past | Present | | | |
| | Past | Present | | | |

IX. KNOWN OR SUSPECTED RELEASES OF HAZARDOUS SUBSTANCES OR WASTE TO THE ENVIRONMENT:

List all on-site spills, disposals and other releases of hazardous substances or materials containing hazardous substances.

| Material/ Chemical Released (Known and suspected) | Physical State of Material (Use codes below) | Approx. Volume Released | Date of Release | Suspected Contaminants (Use codes below) | Source of Release (e.g. tank, buried drums, landfill, product spill, etc.) | Known or Suspected Contamination | | | |
|---|--|-------------------------------|--------------------|---|---|--|------------------|----------|------|
| | | | | | | Ground water | Surface Water | Sediment | Soil |
| Unknown | Unknown | Unknown | Unknown | O | Unknown | <Enter "K" if Known and "S" if Suspected > | | | |
| | | | | | | K | | | K |
| | | | | | | | | | |
| | | | | | | | | | |
| | | | | | | | | | |
| | | | | | | | | | |

Physical State Codes

- G - Containerized Gas
- L - Liquid
- S - Solid/Powder
- Sl - Sludge

Codes for Suspected Contaminants

- A - Acids
- Ab - Asbestos
- Am - Ammonia
- B - Bases
- C - Cyanide
- D - Dioxins
- M - Metals
- Mu - Mixed Municipal Waste
- O - Organic Chemicals
- P - PCBs
- Pe - Petroleum Products
- Ps - Pesticides
- W - Waste Oil

X. TOTAL AREA OF ALL DISPOSALS, SPILLS, OR RELEASES OF HAZARDOUS SUBSTANCES OR WASTE:

- less than 1 acre
- 1 acre or more, but less than 5 acres
- 5 acres or more, but less than 10 acres
- 10 acres or more
- Unknown

XI. AVAILABILITY OF ENVIRONMENTAL ANALYTICAL DATA:

Do any environmental reports or laboratory analytical data exist for the site? Yes No
If yes, attach reports or data to this form.

XII. IDENTIFY WHETHER ANY OF THE FOLLOWING ARE PRESENT OR WERE PRESENT IN THE PAST AT THE SITE (*More than one may apply.*):

- Debris pile(s)
- Land treatment of sludges
- Landfill(s) or buried waste
- Tank(s) underground
- Other (*specify*) Oil Storage Building
- Tank(s) above ground
- Septic tank(s)
- Surface impoundment(s)
- Underground injection of waste
- Spill(s)
- Wastewater lagoon(s)
- Drum(s)

XIII. ACCESSIBILITY OF SITE (*More than one may apply.*):

- 24-hour security guard
- Security guard < 24-hour/day
- Physical barrier (steep bank, creek, walls, etc.)
- Describe physical barriers _____
- Site completely surrounded by fence
- Site partially surrounded by fence
- Locked gate
- Unlocked gate
- No control of access to site
- Other (*specify*) The site is currently under renovation and will be occupied on June 30, 2008.

XIV. WATER SUPPLY SOURCES:

Identify whether the following are present on site or on adjacent property.

| | Present on site | | Present on Adjacent Property | |
|----------------------|--------------------------|-------------------------------------|------------------------------|-------------------------------------|
| | Yes | No | Yes | No |
| Spring | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Well | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Surface Water Intake | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

XV. SITE SURFACE WATER:

Indicate whether any surface water bodies (e.g. streams and lakes) exist on the site or the property adjacent to the site.

A stream and/or drainage ditch exists on adjacent property to the northeast of the site and crosses East Preston Street from northeast to southeast (near the northeast corner of the property) and continues southeast to Bawdy Swamp.

XVI. CERTIFICATION AND SIGNATURE:

I certify that to the best of my knowledge and belief, the information supplied on this form is complete and accurate.

Signature [Handwritten Signature] Date 8 May 03
Name and Title (Type or print) Joseph Wolfsberger, Sr. VP., Environment,
Health and Safety
Mailing Address 1111 Superior Avenue
Cleveland, OH 44114-2584

OHIO STATE
Cuyahoga COUNTY

I, Lynn R. Rogozinski, a Notary Public for said County and State, do hereby certify that Joseph Wolfsberger personally appeared before me this day and acknowledged the due execution of the foregoing instrument.

Witness my hand and official seal, this the 12th day of May, 2003.

(Official Seal)

[Handwritten Signature]
Notary Public

My commission expires No Expiration O.R.C. § 147.03.

LYNN R. ROGOZINSKI, Attny.
NOTARY PUBLIC, STATE OF OHIO
My Commission Has No Expir. Date
O.R.C. Section 147.03

TABLE - DRAFT
SUMMARY OF CHEMICAL CONSTITUENTS DETECTED IN GROUNDWATER
FORMER EATON SITE
SELMA, NORTH CAROLINA
SAMPLING DATE: JANUARY 24, 2008
MID-ATLANTIC JOB NO. R1941.01

| COMPOUND | CONCENTRATION (ug/L) | | | | | | | NCGQS (ug/L) |
|---------------------------|----------------------|-------------|-------------|---------------|-------------|-------------|-------------|--------------|
| | B-1 | B-2 | B-3 | B-4 | B-5 | B-6 | B-7 | |
| Benzene | <0.5 | <0.5 | <0.5 | 228 | <0.5 | <0.5 | <0.5 | 1 |
| Ethylbenzene | <0.5 | <0.5 | <0.5 | 158 | <0.5 | <0.5 | <0.5 | 550 |
| Toluene | 0.52 | 0.74 | 1.81 | 114 | 0.35 J | 0.46 J | 0.45 J | 1,000 |
| Total Xylenes | <1.5 | <1.5 | <1.5 | 734 | 0.28 J | <1.5 | <1.5 | 530 |
| MTBE | <0.5 | <0.5 | <0.5 | 1.34 | <0.5 | <0.5 | <0.5 | 200 |
| 1,3-Dichlorobenzene | <0.5 | <0.5 | <0.5 | 25.6 | <0.5 | <0.5 | <0.5 | 170 |
| 1,4-Dichlorobenzene | <0.5 | <0.5 | <0.5 | 147 | <0.5 | <0.5 | <0.5 | 1.4 |
| 1,2-Dichlorobenzene | <0.5 | <0.5 | <0.5 | 586 | <0.5 | 0.70 | <0.5 | 24 |
| Vinyl Chloride | <0.5 | <0.5 | <0.5 | 43.4 | <0.5 | <0.5 | <0.5 | 0.015 |
| Trichlorofluoromethane | <0.5 | <0.5 | <0.5 | 297 | <0.5 | <0.5 | <0.5 | 2100 |
| 1,1-Dichloroethene | 58.2 | 13.8 | 4.9 | 4,220 | 1.53 | 1.29 | 5.89 | 7 |
| Dichloromethane | <0.5 | <0.5 | <0.5 | 26.6 | <0.5 | <0.5 | <0.5 | 4.6 |
| Trans-1,2-Dichloroethene | <0.5 | <0.5 | <0.5 | 4.4 | <0.5 | <0.5 | <0.5 | 100 |
| 1,1-Dichloroethane | 5.28 | 3.79 | 18.1 | 285 | <0.5 | 1.86 | 3.28 | 70 |
| Chloroform | 5.65 | <0.5 | <0.5 | 49 | <0.5 | <0.5 | <0.5 | 70 |
| 1,1,1-Trichloroethane | 1.89 | <0.5 | <0.5 | 2,970 | <0.5 | <0.5 | <0.5 | 200 |
| Carbon Tetrachloride | <0.5 | <0.5 | <0.5 | 52.5 | <0.5 | <0.5 | <0.5 | 0.269 |
| 1,2-Dichloroethane | <0.5 | <0.5 | <0.5 | 16.6 | <0.5 | <0.5 | <0.5 | 0.38 |
| Trichloroethene | 42.4 | 2.03 | 1.25 | 1,420 | 5.35 | 2.74 | 1.36 | 2.8 |
| 1,1,2-Trichloroethane | <0.5 | <0.5 | <0.5 | 18.4 | <0.5 | <0.5 | <0.5 | NE |
| Tetrachloroethene | 222 | 192 | 3.17 | 37,100 | 13.5 | 7.52 | 9.28 | 0.7 |
| 1,1,2,2-Tetrachloroethane | <0.5 | <0.5 | <0.5 | 10.6 | <0.5 | <0.5 | <0.5 | NE |
| Cis-1,2-Dichloroethene | 7.83 | 5.34 | 2.39 | 644 | 6.03 | 6.62 | 2.32 | 70 |

NOTES:

All results in micrograms per liter (ug/L)

J - Estimated concentration, below the calibration range and above the Method Detection Limit (MDL)

NCGQS - North Carolina Groundwater Quality Standards

NA - Not analyzed

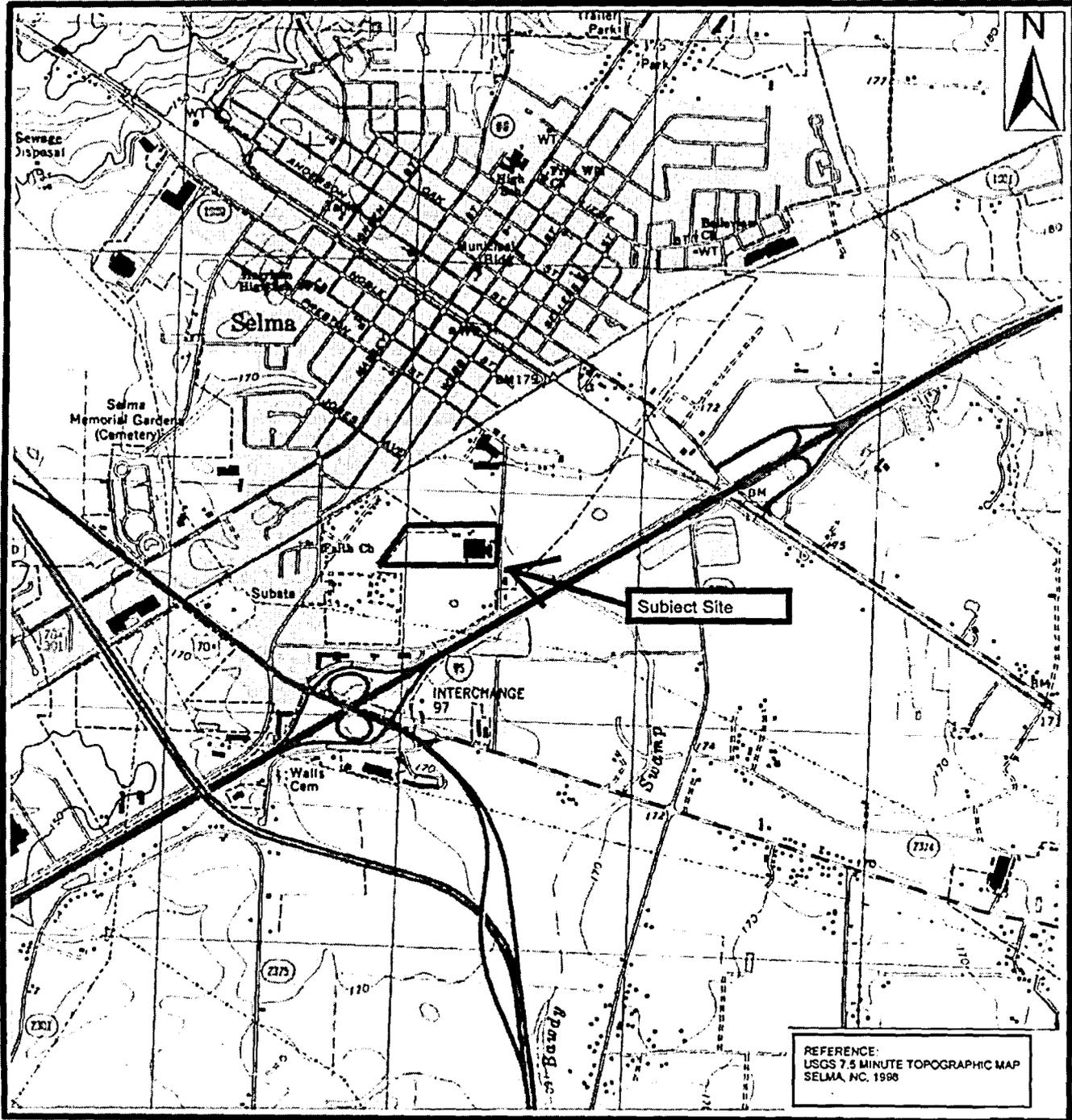
BOLD numbers equal or exceed the North Carolina Groundwater Quality Standard

* - MDL exceeds the NCGQS

TABLE - DRAFT
SUMMARY OF CHEMICAL CONSTITUENTS DETECTED IN SOIL
FORMER EATON SITE
SELMA, NORTH CAROLINA
MID-ATLANTIC JOB NO. R1941.01

| CHEMICAL CONSTITUENT | ANALYTICAL METHOD | CONCENTRATION (mg/Kg or PPM) | | | | INACTIVE HAZARDOUS SITES BRANCH SOIL REMEDIATION GOALS (mg/Kg) |
|----------------------|-------------------|---------------------------------|---------------------------------|---------------------------------|---------------------------------|--|
| | | B-1 0' - 2' BLS 1/24/2008 | B-2 4' - 6" BLS 1/24/2008 | B-3 4' - 6" BLS 1/24/2008 | B-4 2' - 4' BLS 1/24/2008 | |
| Ethylbenzene | 5035/8260 | <0.00892 | <0.0105 | <0.0102 | 22.14 | 380 |
| Total Xylenes | 5035/8260 | <0.02676 | <0.03150 | <0.0306 | 105 | 54 |
| Tetrachloroethene | 5035/8260 | <0.00892 | <0.0105 | <0.0102 | 0.0751 | 0.48 |
| 1,2-Dichlorobenzene | 5035/8260 | <0.00892 | <0.0105 | <0.0102 | 5,562 | 220 |
| 1,3-Dichlorobenzene | 5035/8260 | <0.00892 | <0.0105 | <0.0102 | 44.4 | 106 |
| 1,4-Dichlorobenzene | 5035/8260 | <0.00892 | <0.0105 | <0.0102 | 60.207 | 3.4 |
| 1,2-Dichlorobenzene | 8270 | <0.050 | <0.050 | <0.050 | 9.88 | 220 |
| 1,3-Dichlorobenzene | 8270 | <0.050 | <0.050 | <0.050 | 19.749 | 106 |
| 1,4-Dichlorobenzene | 8270 | <0.050 | <0.050 | <0.050 | 62.288 | 3.4 |
| TVA Reading (PPM) | NA | 10.72 | 7.71 | 1.99 | 137 | NA |

BLS - Below Land Surface
mg/Kg - Milligrams per Kilogram
Bold values in excess of Soil Remediation Goal
NA - Not Applicable
ND - None Detected Above Laboratory Quantitation Limit
PPM - Parts per million



1:24,000

SITE LOCATION MAP
 FORMER EATON FACILITY
 1100 EAST PRESTON STREET
 JOHNSTON COUNTY, SELMA, NC 27576

Solutions-IES
 Industrial & Environmental Services

| | |
|---|-------------------------|
| 1101 Nowell Road, Raleigh, NC 27609 Phone (919) 873-1060, Fax (919) 873-1074 | |
| Created by: BO | Project: 6010 09A2 EATN |
| Checked by: RPR | Date: APRIL 2008 |
| File: Figure 1.mxd | |
| Software: ESRI ArcMap 9.2 | FIGURE 1 |



North Carolina Department of Environment and Natural Resources

Dexter R. Matthews, Director

Division of Waste Management

Michael F. Easley, Governor
William G. Ross Jr., Secretary

CERTIFIED MAIL

October 7, 2008

Mr. Jeff P. Allen
1111 Superior Avenue
Cleveland OH, 44114-2584

Copy

Re: **NOTICE OF REGULATORY REQUIREMENTS FOR CONTAMINANT ASSESSMENT AND CLEANUP**

Eaton Manufacturing Facility (Former)
1100 Preston Street
Selma, Johnston County, NC
Site ID Number: Pending

Dear Mr. Allen:

Thank you for submitting the Site Cleanup Checklist/Questionnaire (Questionnaire) for the above subject site (Site). The Branch has completed its review of the Questionnaire and determined that the Site can be cleaned up through the REC ("Registered Environmental Consultant") Program without direct oversight by Branch Staff.

Note that, if you have not already done so, you must take the initial abatement actions required under 15A NCAC 2L, Groundwater Classifications and Standards. Pursuant to 15A NCAC 2L .0106(b), any person conducting or controlling an activity which results in the discharge of a waste or hazardous substance to the groundwaters of the State, or in proximity thereto, shall take immediate action to terminate and control the discharge, and mitigate any hazards resulting from exposure to the pollutants. Pursuant to 15A NCAC 2L .0106(c), if groundwater standards have been exceeded, you must take immediate action to eliminate the source or sources of contamination. Beyond initial abatement actions, all assessment and remediation will be done through the Inactive Hazardous Sites Response Act ("IHSRA"), codified under N.C. Gen. Stat. § 130A-310.

Under the IHSRA, to receive approval of the assessment and clean up at the Site, you must enter into an administrative agreement with the Branch. Since the Branch has determined that the Site can be cleaned up through the REC Program, execution of an REC-Administrative Agreement (AA) is required. The procedures for entering into an REC-AA are attached. If you have any questions regarding these procedures or the REC Program, please contact the REC Program Manager, Kim Caulk, at (919)508-8451 or visit the REC Program website at <http://www.wastenotnc.org/SFHOME/recprog.htm>.

October 7, 2008
Page 2

If we do not receive a response from you within the next 60 days indicating your willingness to enter an REC-AA, the Branch will take further action to prioritize the Site. Failure to take the initial abatement steps required in 15A NCAC 2L may result in the assessment of a civil penalty against you. In addition, the Branch may seek an injunction compelling compliance with the initial abatement steps required in 15A NCAC 2L. For future work beyond the initial abatement steps required pursuant to 15A NCAC 2L, a unilateral Order may be issued pursuant to § 130A-310.3 to compel assessment and cleanup. In addition, if you choose not to conduct a cleanup voluntarily, the site may be referred to the United States Environmental Protection Agency ("EPA"). If so referred, EPA will screen the site for Federal enforcement action under the Federal Superfund Program, established under the Comprehensive Environmental Responsibility, Compensation, and Liability Act ("CERCLA").

If you have additional questions about the requirements that apply to your site, please contact me at (910) 433-3354.

Sincerely,

David L. Brown, L.G.
Inactive Hazardous Sites Branch
Superfund Section

Enclosure: REC-AA Procedures

cc: Walter J. Beckwith, P.G.
Director of Technical Services
Solutions-IES
1101 Nowell Road
Raleigh, NC 27607
Phone: 919.873.1060
Fax: 919.873.1074
e-mail: wbeckwith@solutions-ies.com
web: www.solutions-ies.com

JOB STATUS REPORT

TIME : 05/15/2008 08:46
NAME : SUPERFUND SECTION
FAX# : 9197334811
TEL# :
SER.# : BR03J1503210

DATE, TIME 05/15 08:42
FAX NO./NAME 919104860707
DURATION 00:03:30
PAGE(S) 09
RESULT OK
MODE STANDARD
ECM



Eaton Corporation
1111 Superior Avenue
Cleveland Ohio, 44114
216-523-4777

May 12, 2008

Ms. Charlotte Jesnick
Inactive Hazardous Sites Branch Head
NC Division of Waste Management
401 Oberlin Road
Suite 150
Raleigh, NC 27605



RE: Notification of Inactive Hazardous Substance Site
1100 East Preston Street, Selma, NC

Dear Ms. Jesnick;

Non-petroleum substances have recently become evident at property located at 1100 East Preston Street in Selma, NC. Eaton Corporation (Eaton) is enclosing a notification form that has been prepared subject to the requirements of NC General Statute 130A-310.1(b). Eaton has procured an environmental consultant and is currently developing a plan to conduct a remedial investigation.

For issues related to this site, please contact Mr. Jeff Allen at the address above or by telephone (216) 523-4777.

Yours truly,

| | | | | | |
|-------------------|------------|------|------------|------------|---|
| Post-it® Fax Note | 7671 | Date | 5-15 | # of pages | 9 |
| To | Dave Brown | From | John Walsh | | |
| Co./Dept. | | Co. | | | |

ATTACHMENT A

Item 4. Are site surface soils known to be contaminated?

During Phase II assessment activities conducted by Mid-Atlantic Associates (MAA) during a property transfer assessment, one soil boring had impacts at a depth of 2-4 feet below ground surface (ft bgs). The attached draft table by MAA summarizes the laboratory data for soils.

Item 5. Is site groundwater known to be contaminated?

During the Phase II property assessment activities conducted by MAA, groundwater from seven borings was sampled. The reported analytical data indicated impacts to groundwater from all seven borings. Please see the attached summary table of groundwater analytical data.

TABLE - DRAFT
SUMMARY OF CHEMICAL CONSTITUENTS DETECTED IN GROUNDWATER
FORMER EATON SITE
SELMA, NORTH CAROLINA
SAMPLING DATE: JANUARY 24, 2008
MID-ATLANTIC JOB NO. R1941.01

| COMPOUND | CONCENTRATION (ug/L) | | | | | | | NCGQS (ug/L) |
|---------------------------|----------------------|-------------|------|--------------|--------|--------|--------|--------------|
| | B-1 | B-2 | B-3 | B-4 | B-5 | B-6 | B-7 | |
| Benzene | <0.5 | <0.5 | <0.5 | 228 | <0.5 | <0.5 | <0.5 | 1 |
| Ethylbenzene | <0.5 | <0.5 | <0.5 | 158 | <0.5 | <0.5 | <0.5 | 550 |
| Toluene | 0.52 | 0.74 | 1.81 | 114 | 0.35 J | 0.46 J | 0.45 J | 1,000 |
| Total Xylenes | <1.5 | <1.5 | <1.5 | 734 | 0.28 J | <1.5 | <1.5 | 530 |
| MTBE | <0.5 | <0.5 | <0.5 | 1.34 | <0.5 | <0.5 | <0.5 | 200 |
| 1,3-Dichlorobenzene | <0.5 | <0.5 | <0.5 | 25.6 | <0.5 | <0.5 | <0.5 | 170 |
| 1,4-Dichlorobenzene | <0.5 | <0.5 | <0.5 | 147 | <0.5 | <0.5 | <0.5 | 1.4 |
| 1,2-Dichlorobenzene | <0.5 | <0.5 | <0.5 | 586 | <0.5 | 0.70 | <0.5 | 24 |
| Vinyl Chloride | <0.5 | <0.5 | <0.5 | 43.4 | <0.5 | <0.5 | <0.5 | 0.015 |
| Trichlorofluoromethane | <0.5 | <0.5 | <0.5 | 297 | <0.5 | <0.5 | <0.5 | 2100 |
| 1,1-Dichloroethene | 58.2 | 13.8 | 4.9 | 4,220 | 1.53 | 1.29 | 5.89 | 7 |
| Dichloromethane | <0.5 | <0.5 | <0.5 | 26.6 | <0.5 | <0.5 | <0.5 | 4.6 |
| Trans-1,2-Dichloroethene | <0.5 | <0.5 | <0.5 | 4.4 | <0.5 | <0.5 | <0.5 | 100 |
| 1,1-Dichloroethane | 5.28 | 3.79 | 18.1 | 285 | <0.5 | 1.86 | 3.28 | 70 |
| Chloroform | 5.65 | <0.5 | <0.5 | 49 | <0.5 | <0.5 | <0.5 | 70 |
| 1,1,1-Trichloroethane | 1.89 | <0.5 | <0.5 | 2,970 | <0.5 | <0.5 | <0.5 | 200 |
| Carbon Tetrachloride | <0.5 | <0.5 | <0.5 | 52.5 | <0.5 | <0.5 | <0.5 | 0.269 |
| 1,2-Dichloroethane | <0.5 | <0.5 | <0.5 | 16.6 | <0.5 | <0.5 | <0.5 | 0.38 |
| Trichloroethene | 42.4 | 2.03 | 1.25 | 1,420 | 5.35 | 2.74 | 1.36 | 2.8 |
| 1,1,2-Trichloroethane | <0.5 | <0.5 | <0.5 | 18.4 | <0.5 | <0.5 | <0.5 | NE |
| Tetrachloroethene | 222 | 192 | 3.17 | 37,100 | 13.5 | 7.52 | 9.28 | 0.7 |
| 1,1,2,2-Tetrachloroethane | <0.5 | <0.5 | <0.5 | 10.6 | <0.5 | <0.5 | <0.5 | NE |
| Cis-1,2-Dichloroethene | 7.83 | 5.34 | 2.39 | 644 | 6.03 | 6.62 | 2.32 | 70 |

NOTES:

All results in micrograms per liter (ug/L)

J - Estimated concentration, below the calibration range and above the Method Detection Limit (MDL)

NCGQS - North Carolina Groundwater Quality Standards

NA - Not analyzed

BOLD numbers equal or exceed the North Carolina Groundwater Quality Standard

* - MDL exceeds the NCGQS

TABLE - DRAFT
SUMMARY OF CHEMICAL CONSTITUENTS DETECTED IN SOIL
FORMER EATON SITE
SELMA, NORTH CAROLINA
MID-ATLANTIC JOB NO. R1941.01

| CHEMICAL CONSTITUENT | ANALYTICAL METHOD | CONCENTRATION (mg/Kg or PPM) | | | | INACTIVE HAZARDOUS SITES BRANCH SOIL REMEDIATION GOALS (mg/Kg) |
|----------------------|-------------------|---------------------------------|---------------------------------|---------------------------------|---------------------------------|--|
| | | B-1 0' - 2' BLS 1/24/2008 | B-2 4' - 6" BLS 1/24/2008 | B-3 4' - 6" BLS 1/24/2008 | B-4 2' - 4' BLS 1/24/2008 | |
| Ethylbenzene | 5035/8260 | <0.00892 | <0.0105 | <0.0102 | 22.14 | 380 |
| Total Xylenes | 5035/8260 | <0.02676 | <0.03150 | <0.0306 | 105 | 54 |
| Tetrachloroethene | 5035/8260 | <0.00892 | <0.0105 | <0.0102 | 0.0751 | 0.48 |
| 1,2-Dichlorobenzene | 5035/8260 | <0.00892 | <0.0105 | <0.0102 | 5,562 | 220 |
| 1,3-Dichlorobenzene | 5035/8260 | <0.00892 | <0.0105 | <0.0102 | 44.4 | 106 |
| 1,4-Dichlorobenzene | 5035/8260 | <0.00892 | <0.0105 | <0.0102 | 60.207 | 3.4 |
| 1,2-Dichlorobenzene | 8270 | <0.050 | <0.050 | <0.050 | 9.88 | 220 |
| 1,3-Dichlorobenzene | 8270 | <0.050 | <0.050 | <0.050 | 19.749 | 106 |
| 1,4-Dichlorobenzene | 8270 | <0.050 | <0.050 | <0.050 | 62.288 | 3.4 |
| TVA Reading (PPM) | NA | 10.72 | 7.71 | 1.99 | 137 | NA |

BLS - Below Land Surface
mg/Kg - Milligrams per Kilogram
Bold values in excess of Soil Remediation Goal
NA - Not Applicable
ND - None Detected Above Laboratory Quantitation Limit
PPM - Parts per million