

HATURAL RESOURCES

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REMEDIAL INVESTIGATION CLOSURE PLAN

ESTATE OF AARON L. TILTON 3217 WEST VILLARD AVENUE MILWAUKEE, WISCONSIN

MAY 1992

PREPARED FOR: ESTATE OF AARON L. TILTON

> CIO MR. JAMES L. WALT MILWAUKEE, WISCONSIN

> PREPARED BY:
> WARZYN INC.
> MILWAUKEE, WISCONSIN

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C/O MR. JAMES L. WALT MILWAUKEE, WISCONSIN

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I, Laurie J. Parsons, hereby certify that I am a registered professional Engineer in the State of Wisconsin in accordance with ch.A-E4, Wis. Adm. Code and that this report has been prepared in accordance with the Rules Of Professional Conduct in ch.A-E8, Wis. Adm. Code

Laurie J. Parsons, P.E.

Senior Environmental Engineer

I, Dennis R. Lawton, hereby certify that I am a hydrogeologist as defined in s,NR 600.03(98), Wis. Adm. Code and that to the best of my knowledge, all information contained in this document is correct.

Dennis R. Lawton, CPG

Senior Manager

Kevin D. Shaver, CHMM

Senior Environmental Scientist

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Introduction

Warzyn Inc. (Warzyn) has been retained by the Estate of Aaron L. Tilton to prepare this closure plan document to fulfill the requirements of the January 2, 1992 Wisconsin Department of Natural Resources (WDNR) Notice of Incompleteness (NOI). The NOI indicated Warzyn's November 25, 1991 correspondence "Work Plan for Remedial Investigation" did not contain the minimum information required by Ch. NR 600-685 Wisconsin Administrative Code (Wis. Adm. Code). The purpose of the Remedial Investigation Closure Plan is to define the extent and degree of contamination associated with a release of dry cleaning solvents at the subject property.

Warzyn recognizes this Remedial Investigation Closure Plan only partially fulfills the requirements of NR 685.05 Wis. Adm. Code at this time. The closure process will involve a series of modifications leading to the development of a final closure plan for the property. Following the implementation of the Remedial Investigation Closure Plan, Warzyn will report the results of the investigation and provide recommendations and the basis for choosing additional investigation and/or remedial alternatives in a document to be entitled Remedial Action Closure Plan. Following the implementation of the selected remedial actions, Warzyn will prepare a final closure plan indicating whether the property has been closed in accordance with NR 645.17 and NR 685.05 Wis. Adm. Code.

BACKGROUND

Warzyn was retained by the Estate of Aaron L. Tilton to perform limited Phase II Environmental Site Assessment (ESA) of the subject property located at 3217 West Villard Avenue, Milwaukee, Wisconsin as part of a real estate transaction. The representative for the subject property is:

Mr. James L. Walt Attorney for the Estate of Aaron L. Tilton 845 North Eleventh Street Milwaukee, Wisconsin 53233 (414) 271-8860

During September and October 1991, as part of the Phase II ESA, Warzyn began investigating whether the past dry cleaning operations that occurred at the property had impacted the subsurface soil and groundwater at the subject property.

Subsequent to the findings of the Phase II ESA, Warzyn verbally notified Ms. Pamela Mylotta of the Wisconsin Department of Natural Resources (WDNR) on October 25, 1991 regarding discovery of hazardous substances (i.e., dry cleaning solvents) at the subject property in accordance with Chapter NR 158 Wis. Adm. Code and Wisconsin Statute s.144.76(2). A follow-up written notice was submitted to Ms. Mylotta on November 7, 1991.

Subsequent to the verbal notification, on October 28, 1991 the WDNR requested the submittal of a work plan for conducting a remedial investigation. On November 25, 1991, Warzyn submitted a work plan in accordance with the requirements outlined in the October 28, 1991 letter. Warzyn's November 25, 1991 Work Plan submittal was based on the remedial investigation being conducted in accordance with Chapter NR 158 Wis. Adm. Code, which applies to spill or releases of hazardous substances. As discussed below, the WDNR, however, subsequently determined that the apparent release would be attributed to the generation and on-site accumulation of a hazardous waste (as defined in Wisconsin Statute s.144.61), and thus would be subject to the requirements of Chapter NR 600-685 Wis. Adm. Code and Wisconsin Statute s.144.64(2m). As a

result, on January 2, 1992 Mr. Scott J. Ferguson issued a Notice of Incompleteness (NOI) indicating that the work plan did not contain the minimum information required by the WDNR.

The WDNR has determined that the suspected releases of chlorinated solvents from the past dry cleaning operations at the property would deem the property an unlicensed hazardous waste facility as outlined in Wisconsin Statute s.144.64(2m). In addition, the WDNR has determined that the sump located inside the building, which was installed to collect spilled dry cleaning solvents, should be classified as an underground storage tank and be subject to the closure requirements set forth in NR 645.17 Wis. Adm. Code. Therefore, based on these regulations, the WDNR has requested that a closure plan be submitted in accordance with NR 685.05 Wis. Adm. Code for the remedial investigation. Subsequently Warzyn has developed this Remedial Investigation Closure Plan in accordance with the appropriate regulations and guidance information contained in the January 2, 1992 letter received from Mr. Scott Ferguson of the WDNR.

SITE DESCRIPTION

The subject property (Estate of Aaron L. Tilton) is located at 3217 West Villard Avenue in the City of Milwaukee, Wisconsin. The subject property is located in the Northwest Quarter of the Southwest Quarter of Section 36, Township 8 North, Range 21 East, in the City of Milwaukee, Milwaukee County, Wisconsin.

The subject property is bounded by West Villard Avenue and across the way by an industrial development to the north; the Chicago, Minneapolis, Saint Paul and Pacific (Soo Line) railroad tracks and across the way by an industrial development to the east and southeast; and an industrial development, a church and a U.S. Post Office to the west and southwest.

The subject property is approximately 56,296 square feet in size and is occupied by a one-story brick building. The building is approximately 17,400 square feet in size. Approximately 16,400 square feet is occupied by a grocery store (Sheridan's Shop Rite) and 1,000 square feet by a pick-up dry cleaning shop (Valet Cleaners). The remaining surface area of the property is covered with an asphalt parking lot.

The City of Milwaukee provides potable water and sanitary sewer services to the subject property. According to the City of Milwaukee zoning records, the property is zoned industrial and business (I-B-85). A review of the Milwaukee, Wisconsin 7.5 minute U.S.G.S. topographic quadrangle map indicated that the surface topography on the vicinity gently slopes to the east-southeast towards Lincoln Creek, which is located approximately 950 feet to the east-southeast. In addition, review of the WDNR map *Wisconsin Wetland Inventory (Revised February 1989)* showed that wetlands are not located on the subject property.

A Site Location Map (Figure 1) and Site Features Map (Figure 2) are provided to indicate the location and general layout of the subject property.

HISTORICAL PROPERTY USE AND OPERATIONS

HISTORICAL OWNERSHIP OF PROPERTY

To obtain information pertaining to site ownership and operations history, records were reviewed from the following sources:

- City of Milwaukee Building Inspector Records
- City of Milwaukee Tax Assessor Records
- · City of Milwaukee Records Center blue prints
- Sanborn Map Company Inc. (Sanborn Inc.) maps for the years 1910, 1929, 1950, and 1967
- Southeastern Wisconsin Regional Planning Commission (SEWRPC) aerial photographs for the years 1963, 1967, 1970, 1975, 1980 and 1985

The following is a composite summary of the past ownership, development, and operations at the site dating back to 1910.

The Sanborn Inc. map for 1910 showed the subject property was occupied by the Westfield & Fall River Lumber Company, and contained lumber piles, sheds and an office located in the northwest corner of the subject property. Between 1910 and 1924 the ownership of the property changed to the Alexander Stewart Lumber Company. According to the City of Milwaukee Tax Assessor's records, the North Milwaukee Lumber & Supply Company subsequently owned the property from 1924 to 1962. During the Milwaukee Lumber & Supply Company ownership of the subject property, the Sanborn Inc. maps for 1929 and 1950 depicted the property as not changing significantly from the features on the 1910 Sanborn Inc. map.

According to the City of Milwaukee Tax Assessor's records, in 1962 the ownership title was transferred to Pentler-Mikkelson Venture, who subsequently leased the property to the National Food Stores, Inc. In addition, the records revealed that construction of the current building at the subject property was completed in 1963. In 1964, the subject property was transferred from the

Pentler-Mikkelson Venture to Mr. Aaron L. Tilton (currently the property is held in a irrevocable trust). The SEWRPC aerial photographs (1963-1985) indicated the subject property had not changed from the original 1962 site plan on file at the City of Milwaukee Records Center.

According to the City of Milwaukee Building Inspector's records, the northeastern 1,000 square feet of the building was operated as a coin operated laundry from 1962 until 1976. In 1976, an application for occupancy was filed with the City of Milwaukee Building Inspector's office for a dry cleaning operation using perchloroethylene (tetrachloroethene). During 1978, the dry cleaning operation was modified by One Hour Fabricare Cleaners. According to the equipment schedule for the modification, a concrete sump was installed to collect spillage from the cleaning machine. According to an August 1989 Environmental Site Assessment completed for Michael, Best and Friedrich by Geraghty & Miller, Inc., the dry cleaning operations of the site discontinued in 1984.

PAST HAZARDOUS WASTE ACTIVITIES AT PROPERTY

According to the historical records, dry cleaning solvent (i.e., perchloroethylene) was used at the property. According to the City of Milwaukee Building Inspector's records, the dry cleaning operations were performed in a type IV nontransfer Permac dry cleaning unit. A dike was constructed around the dry cleaning unit to direct any spillage of solvent into the concrete sump. Records are not available regarding the disposal practices of any solvent collected in the sump or the frequency and amount of any generated waste dry cleaning solvents. Dry cleaning solvents that may have accumulated within the sump have been removed. Prior to conducting the Phase II ESA, the concrete sump appeared to be in good condition and had no evidence of deterioration or cracks. In addition, the WDNR publication, Statewide Spills and Hazardous Incidents Report (January 1990) did not indicate past spills or other incidents which could be potential sources of contamination at the subject property. As previously mentioned, during a Phase II ESA conducted in September and October of 1991, Warzyn began investigating whether the sump had impacted the subsoils or groundwater at the subject property.

On September 20, 1991, Warzyn conducted preliminary field activities including the collection of soil samples during the installation of two groundwater monitoring wells at the site (refer to Figure 2 for location). On October 1, 1991, the groundwater monitoring wells were sampled and the samples submitted to Warzyn's Analytical Services Laboratory (WDNR Certified Laboratory ID#113138300) in Madison, Wisconsin for analysis.

As shown in Appendix A, the soil sample results from the 2.5 to 5.5 foot (B1-S2) and 16.0 to 18.0 foot (B1-S7) depth intervals had detectable levels of chlorobenzene (25 μ g/kg), cis-1,2-dichloroethene (2,800 μ g/kg), trans-1,2-dichloroethene (26 μ g/kg), tetrachloroethene (37,000 to 140,000 μ g/kg), trichloroethene (420 to 30,000 μ g/kg) and vinyl chloride (31 μ g/kg).

As shown in Appendix B, the groundwater sample from monitoring well B1 had detectable levels of chlorobenzene (2.0 μ g/L), 1,1-dichloroethene (1.8 μ g/L), cis-1,2-dichloroethane (1.3 μ g/L), tetrachloroethene (14,000 μ g/L), toluene (16 μ g/L), trichloroethene (220 μ g/L), and vinyl chloride (11 μ g/L). The levels of several of these compounds exceed the enforcement standards for groundwater quality as specified in s.NR 140.10 Wis. Adm. Code, including: cis-1,2-dichloroethene (100 μ g/L), tetrachloroethene (1 μ g/L), trichloroethene (5 μ g/L), and vinyl chloride (0.2 μ g/L).

TOPOGRAPHY, GEOLOGY, AND HYDROGEOLOGY OF PROPERTY AND SURROUNDING VICINITY

REGIONAL INFORMATION REVIEW

According to the Southeastern Wisconsin Regional Planning Commission (SEWRPC) publication, A Solid Waste Management Plan for Milwaukee County, Wisconsin (July 1987) the subject property is located on a glacial ground moraine. The surface topography in the vicinity of the subject property is gently sloping to the east towards Lincoln Creek, which is located approximately 950 feet to the east-southeast. Well logs available from the WDNR-Southeast District Office for the Southwest and Northwest Quarters of Section 35 and Southeast and Northeast Quarters of Section 36 of Township 8 North, Range 21 East (approximately 0.5 mile radius from the subject property) indicate that unconsolidated glacial sediments consisting of primarily clay extend from near ground surface to maximum depths of 65 to 170 feet, where bedrock was encountered. According to the SEWRPC publication, the surface of the bedrock in the vicinity of the subject property is composed of dolomite, some limestone, and shale of the Milwaukee Formation of Devonian Age.

A hardpan layer, ranging in thickness from 5 to 20 feet, was noted above the bedrock in 11 of the 21 well logs reviewed. The term "hardpan" is an unofficial descriptive term used inconsistently by well drillers to describe material difficult to drill through and is generally considered to be a glacial till consisting of sand to boulder size particles in a matrix of fine sand to clay.

The U.S. Department of Agriculture publication, Soil Survey of Milwaukee and Waukesha Counties, Wisconsin (July 1971) indicated surficial soil in the vicinity of the subject property is of the Ozaukee-Morley-Mequon Association. These types of soils are classified as well-drained to somewhat poorly-drained soils that have a subsoil of silty clay loam and silty clay. These types of soils are formed in thin layers of silty clay loam glacial till on moraines.

According to the U.S. Department of the Interior publication, Groundwater Conditions in the Milwaukee-Waukesha Area, Wisconsin (1953) three primary aguifers are located in the vicinity of the subject property. The shallowest aquifer consists of permeable sand and gravel units within the unconsolidated glacial sediments and is generally referred to as the sand and gravel aquifer. The lowpermeability clay and silt deposits (glacial till) that comprise much of the unconsolidated glacial sediments are generally not considered aquifer materials because they do not provide adequate amounts of water to supply wells. The sand and gravel aquifer is generally hydraulically connected to the underlying Niagara aquifer, which consists of dolomite, shale and limestone of the Devonian age Milwaukee Formation and Silurian age Niagara Formation. This aquifer is the primary aquifer used in the Milwaukee vicinity for private domestic, commercial and some industrial wells. Underlying the Niagara aquifer is the Ordovician age Maquoketa shale, which is an aquitard between the Niagara aquifer and the underlying sandstone aquifer. The sandstone aquifer consists of Cambrian and Ordovician age sandstone and dolomite and is used for some high capacity commercial or industrial wells in the Milwaukee area.

According to the SEWRPC publication, the depth to seasonal high groundwater in the unconsolidated soils in the vicinity of the subject property was estimated to be about 10 to 30 feet in 1976. Based on a review of regional topographic maps, it appears shallow groundwater flow likely would be in a east-southeasternly direction towards Lincoln Creek, which is located approximately 950 feet to the east-southeast (Figure 1). However, localized conditions may affect the depth to groundwater and flow direction at the property. Flow direction in the deeper Niagara bedrock and sandstone aquifers likely trends in an easterly direction.

During this investigation, no evidence was noted that suggests operations at the property have impacted either the Niagara or sandstone aquifers. Well logs suggest 65 to 170 feet of clay soils overlie the Niagara aquifer at the property. This thick layer of clay would tend to minimize the potential for contaminants to migrate to either the Niagara or sandstone aquifer.

According to the logs reviewed for wells in the vicinity of the subject property (approximately 0.5 mile radius), 14 of the 21 wells were cased to a depth of at least 80 feet. Five of the well logs did not contain sufficient information to determine the depth of casing. However, these 5 wells penetrated into the dolomite bedrock to depths ranging from 96 to 310 feet. Thus, it appears likely these 5 wells would also be cased to a significant depth. The remaining two wells appear to be cased to 41 and 64 feet (depth where bedrock was encountered at both wells).

It was noted during the well log review that 19 of the 21 wells indicated use for residential purposes. However, because the wells are located in a developed area of the City of Milwaukee (with municipal water supplies available), it is likely these wells are no longer in use as a drinking water source. Another well was listed as being for a County Park (completion date November 1941). It is not known if this well is still in use, but it was cased into bedrock at 111 feet. The remaining well is listed as being for a tavern (completion date February 1938). It is not known if this well is still in use, but the well was completed to a depth of 310 feet (depth of casing not indicated).

PHASE II ESA FIELD INVESTIGATION

On September 20, 1991, two groundwater monitoring wells were installed (i.e., MW1 and MW2) at the property by Warzyn as a part of a Phase II Environmental Site Assessment. Copies of the soil boring logs and well construction and development forms can be found in Appendix C.

Fill material was encountered in both borings ranging from ground surface to a maximum depth of approximately 7.0 feet. The upper portions of the fill materials consisted of brown, fine to medium sand with some gravel (ranging from ground surface to 5.0 feet). Fill material beneath the sand in MW1 (ranging in depth from 5.0 to 7.0 feet) consisted of brown to grayish black lean clay, with a trace fine to medium sand and gravel. Beneath the fill material was a layer of stiff, mottled lean clay, with little fine to medium sand and trace gravel which extended to a maximum depth of 21.0 feet. Beneath the brown clay layer, a grayish brown lean clay, with little fine to medium sand and trace gravel, extended to the bottom soil borings at 25.5 feet.

Water levels measured during the time of drilling were at 4.0 feet below ground surface (bgs) in MW1 and dry for MW2. MW2 was measured five hours after drilling and was again dry.

On September 27,1991, the groundwater monitoring wells were developed with a bailer. Prior to development, measured water levels were 6.31 feet bgs in MW1 and 19.57 feet bgs in MW2. On September 30, 1991, the groundwater monitoring wells were purged prior to sampling. The measured water levels prior to sample development were 18.61 feet bgs in MW1 and 20.02 feet bgs in MW2. On October 1,1991, the groundwater monitoring wells were sampled. The measured water levels prior to sampling were 22.62 feet bgs in MW1 and 22.07 feet bgs in MW2.

These water level measurements indicate the monitoring wells have not fully stabilized. During the remedial investigation Warzyn will attempt to obtain consistent water level measurement from these wells and the proposed wells, in order to evaluate the direction of groundwater flow at the property.

PROPOSAL FOR REMEDIAL INVESTIGATION

Warzyn has developed this work plan to describe the field activities to be conducted during the remedial investigation portion of the closure plan. The purpose of the remedial investigation will be to determine the horizontal and vertical extent of contamination in soil and groundwater and evaluate need for remediation and potential remedial options to meet closure performance standards in accordance with NR 685.05. In addition, Warzyn will develop and implement a health and safety plan for the following field activities.

SOIL BORINGS, SAMPLING AND FIELD SCREENING

Warzyn will conduct a total of four soil borings (i.e., B3, B4, B5 and B6). Soil borings have been selected as an investigation method over a soil gas survey so that quantatative analytical results can be obtained. The proposed locations of the borings are shown on Figure 2. Additional soil borings may be conducted to the north and west if field observations during the soil borings (i.e., elevated PID readings) indicate an extended area of soil contamination laterally.

A truck-mounted rotary drill rig will be used to complete the borings. Soil samples will be collected using a hollow-stem auger (HSA) and split-spoon sampling. The samples will be collected every 2.5 feet to a maximum depth of 25 feet, in accordance with ASTM:D 1586-84 methods. As samples are obtained in the field, they will be visually classified by a Warzyn geologist in accordance with ASTM:D 2487-84 and ASTM:D 2488 methods. Representative portions of the samples will be returned to the laboratory for further examination and verification. Sample lithology will be recorded using the Unified Soil Classification System. Soil boring logs (WDNR Form 4400-122) documenting soil types and subsurface conditions will be completed by a Warzyn geologist and included in the project report.

The soil samples from each sampled interval will be split into several glass sample jars, including a four-ounce jar sealed with aluminum foil for headspace

screening and an eight-ounce jar for laboratory analysis. The soil samples in the four-ounce jars will be approximately one-half full.

The split spoon sampler will be cleaned between samples to minimize cross-contamination. The cleaning procedures will consist of a soap and water wash, with tap water and distilled water rinses. To avoid cross-contamination between soil borings, drilling augers and sampling equipment will be steam-cleaned between holes. If a boring is not converted into a groundwater monitoring well, it will be abandoned with bentonite slurry in accordance with the abandonment requirements of s.NR 141.25 Wis. Adm. Code. The abandonment will be documented on WDNR Form 3300-5B. Soil borings spoils will be placed into 55-gallon steel drums. Contaminated soil boring spoils (i.e., detectable levels of chlorinated solvents) will be disposed of as hazardous waste (i.e. F002), in accordance with Chapter NR 600 to 685 Wis. Adm. Code.

An HNu Systems Model 101 photoionization detector (PID) will be used to screen soil samples for the presence of volatile organic compounds (VOCs). Specifically, a 10.2 eV lamp will be used with the PID to screen the soils. This lamp has been selected based upon the ionization potential of tetrachloroethane (9.32 eV) and trichloroethene (9.47 eV). The PID will be calibrated daily with 52.1 ppm isobutylene gas in accordance with Warzyn's written instrument operating procedure. The four-ounce sample jars will be allowed to warm to approximately 70°F for a minimum of 30 minutes. The selection of soil samples for analysis will be based upon this PID screening, along with the visual evidence of potential contamination (i.e., stained soils). Two soil samples from each boring exhibiting the highest PID reading (if present), or where the boring intersects the groundwater table will be collected. The samples will be submitted for VOC analysis at Warzyn's Technical Services Laboratory in Madison, Wisconsin (WDNR Certification ID# 113138300).

The VOC analysis will utilize U.S. EPA Method 8010 and 8020 in SW-846, Test Methods for Evaluating Solid Waste, September 1986. The analytical detection limit for the tetrachloroethene and trichloroethene is $5 \mu g/kg$.

GROUNDWATER MONITORING WELL INSTALLATION AND MONITORING

Warzyn will install and develop three groundwater monitoring wells which will be co-located at the soil boring locations (B3, B4, B6 as depicted in Figure 2). Well construction, development and sampling will meet the requirements outlined in Chapter NR 141 Wis. Adm. Code and in accordance with Warzyn's standard protocol (Appendix D). The well construction will be documented on WDNR

Form 4400-113A, while the development will be documented on WDNR Form 4400-113B. Each well will be constructed such that the well screen intersects the water table during seasonal fluctuations. In addition, well construction materials will be steam-cleaned prior to installation to avoid cross-contamination. The monitoring wells will be installed with flush-mounted protective covers and surface-sealed with concrete.

Two rounds of groundwater samples will be collected from the new and previously existing monitoring wells. The new wells will be developed as specified in NR 141 Wis. Adm. Code. Because the subsoils at the property consist of lean clay, the wells will not yield a continuous 5 to 10 well volumes, but instead will be bailed until further yield cannot be achieved. The wells will be allowed to stabilize (recharge) prior to sampling so the collected sample is representative of groundwater at that location. Prior to sample collection, wells will be purged by removing a maximum of 3 to 5 well volumes, or until further yield cannot be achieved. Purging and sample collection will be accomplished by using a stainless steel bailer. The purged groundwater will be containerized into 55-gallon drums. The two rounds of groundwater samples will be taken at least 30 days apart.

To avoid cross-contamination during groundwater sampling, the bailer will be decontaminated between wells using a trisodium phosphate (TSP) wash and triple distilled water rinse. A field blank, bailer blank, and duplicate will be collected to document the quality control (QC) of the sampling. The collected groundwater samples will be analyzed for VOCs. The VOC analysis will utilize U.S. EPA Method 8010/8020 in SW 846, Test Methods for Evaluating Solid Waste, November 1986. The analytical detection limit for tetrachloroethene and trichloroethene is 1.0 µg/L.

The soil and groundwater sample containers will be clearly marked using an indelible marking pen indicating the sample date, location, and identification number. The sample will be cooled to 4°C and shipped for analysis to Warzyn's Technical Services Laboratory using chain-of-custody procedures.

The top of each monitoring well will be surveyed and referenced to mean sea level using an off-site benchmark for determining future groundwater elevations. A survey map of the well locations will be included with the report. In addition, the survey group will indicate the presence of underground and aboveground utilities present at the subject property. The water levels in each well will be measured prior to sampling. In addition, three separate rounds of water levels will be measured in each well. However, because of the low permeability of the lean clays at the subject property, the measured water levels may not fully stabilize to accurately predict the direction of groundwater flow at the property. Therefore,

this data will be used to develop a preliminary water table contour map of the property.

REMEDIAL ACTION CLOSURE PLAN

Upon completion of the remedial investigation, Warzyn will prepare a Remedial Action Closure Plan describing the subsurface soil and groundwater sampling program, and findings obtained. Analytical results will be summarized in table form and will be discussed regarding potential environmental impact (e.g., groundwater standards in Chapter NR 140 Wis. Adm. Code). Conclusions will be given regarding the subsurface condition of the property through geologic cross-sections, boring logs, well construction maps, and water table maps. The Remedial Action Closure Plan will discuss recommendations for additional investigations and/or remedial alternatives. The remedial action alternatives will be discussed in regards to managing soils and groundwater disposal, the potential problems with the structural integrity of the building, and cost and schedule of the closure activities. Prior to the selection and implementation of a remedial action closure plan (if necessary) the appropriate clean up goals for the property will be discussed with the WDNR.

WORK SCHEDULE

As indicated in Table 1, Warzyn has developed a work schedule for implementation of the Remedial Action Closure Plan and the development of the Remedial Action Closure Plan. However, the work schedule does not include time frames for the implementation of any remedial action alternatives, since such alternatives have not been evaluated and selected. The work schedule will be implemented once this Remedial Action Closure Plan has been approved by the WDNR.

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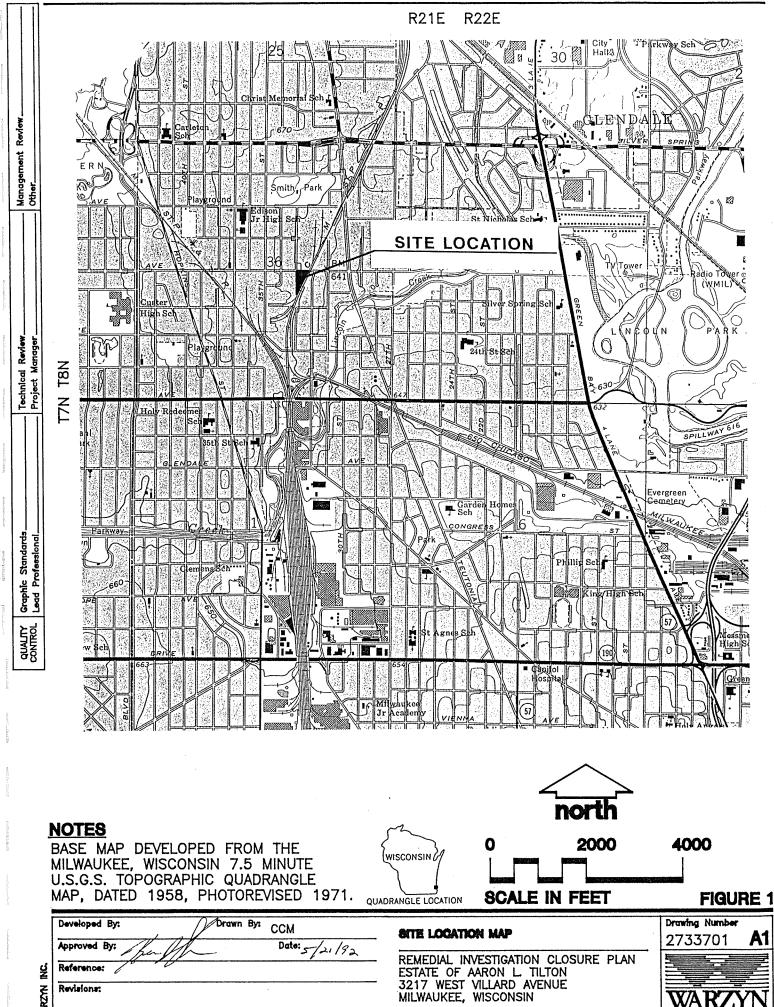
TABLE 1

WORK SCHEDULE

REMEDIAL INVESTIGATION CLOSURE PLAN ESTATE OF AARON L. TILTON 3217 WEST VILLARD AVENUE MILWAUKEE, WISCONSIN

TASK	01	10 20	30 4	0 50	DAYS 60 70	80	90	100 1	10 120
TASK 1: Soil Borings, Sampling, and Field Screening									
TASK 2: Groundwater Monitoring Well Installation and Development			·						
TASK 3: Groundwater Sampling and Analysis								-	
TASK 4: Groundwater Elevations									
TASK 5: Remedial Action Closure Plan							· · · · · · · · · · · · · · · · · · ·		
TASK 6: Meetings Kick-off Post Remedial Investigation	*								*

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APPENDIX A

CHAIN-OF-CUSTODY AND ANALYTICAL RESULTS FOR SOIL SAMPLES



CHAIN OF CUSTODY RECORD

Warzyn Engineering Inc.
Scier int
University Research Park
P.O. Box 5385
Madison, Wisconsin,53705
[608] 273-0440

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Distribution: 1	White —	Accompan	ies Shir	oment:	; Yellow — Laboratory File ; Pink — Coordinator Field	l Files	^	سكرار	 				Nº 9 3566



LABORATORY RESULTS VOLATILE ORGANIC REPORT

Project: Villard Phase II

Project #: 27337.01

Location: Milwaukee, Wisconsin

Date Sampled: 9/20/91

Compound	Reporting Limits (ug/kg)	3337-001 <u>B1-S2</u>	3337-002 <u>B1-S7</u>	3337-003 <u>B2-S7</u>
Benzene	5.0	< 5.0	< 5.0	< 5.0
Bromodichloromethane	5.0	< 5.0	< 5.0	< 5.0
Bromoform	5.0	<5.0	< 5.0	< 5.0
Bromomethane	10	< 10	<10	< 10
Carbon tetrachloride	5.0	< 5.0	<5.0	< 5.0
Chlorobenzene	5.0	<5.0	25	< 5.0
Chlorodibromomethane	5.0	< 5.0	<250 (a)	< 5.0
Chloroethane	10	<10	<10	< 10
2-Chloroethylvinyl ether	50	< 50	<50	< 50
Chloroform	5.0	< 5.0	< 5.0	< 5.0
Chloromethane	10	<10	< 10	< 10
1,2-Dichlorobenzene	5.0	< 5.0	< 5.0	< 5.0
1,3-Dichlorobenzene	5.0	< 5.0	< 5.0	< 5.0
1,4-Dichlorobenzene	5.0	<5.0	< 5.0	<5.0
1,1-Dichloroethane	5.0	<5.0	<5.0	<5.0
1,2-Dichloroethane	5.0	< 5.0	<5.0	< 5.0
1,1-Dichloroethene	5.0	< 5.0	<5.0	< 5.0
cis-1,2-Dichloroethene	5.0	2800	<20 (a)	< 5.0
trans-1,2-Dichloroethene		26	<5.0	<5.0
1,2-Dichloropropane	5.0	<5.0	<5.0	<5.0
cis-1,3-Dichloropropene		<5.0	< 5.0	< 5.0
trans-1,3-Dichloroprope		<5.0	< 5.0	< 5.0
Ethylbenzene	5.0	<5.0	< 5.0	< 5.0
Methylene chloride	15	<15	<15	< 15
1,1,2,2-Tetrachloroetha		<5.0	< 5.0	< 5.0
Tetrachloroethene	5.0	37000	140000	< 5.0
Toluene	5.0	< 5.0	< 5.0	< 5.0
1,1,1-Trichloroethane	5.0	< 5.0	< 5.0	<5.0
1,1,2-Trichloroethane	5.0	< 5.0	< 5.0	< 5.0
Trichloroethene	5.0	3000	420 (b)	< 5.0
Trichlorofluoromethane		< 5.0	< 5.0	< 5.0
Vinyl chloride	5.0	31	< 5.0	< 5.0
m and p-Xylene	10	< 10	< 10	< 10
o-Xylene	5.0	< 5.0	<5.0	< 5.0

(a) Elevated quantitation limit necessary to overcome interference.

(b) Result should be considered estimated, concentration exceeds working calibration range.

Solids are analyzed on an "as received" or wet weight basis.

Method Reference: SW846, "Test Methods for Evaluating Solid Waste", November 1986. Method 8010/8020.

Ck'd: KApp'd: :51111
Date Issued: 10/15/91

APPENDIX B

CHAIN-OF-CUSTODY AND ANALYTICAL RESULTS FOR GROUNDWATER SAMPLES



CHAIN OF CUSTODY RECORD

Warzyn Engineering Inc. e Scie urt University Research Park P.O. Box 5385 Madison, Wisconsin 53705 (608) 273-0440

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Distribution: White — Accompanies Shipment; Yellow — Laboratory File; Pink — Coordinator Field Files

Nº 9 3575



LABORATORY RESULTS VOLATILE ORGANIC REPORT

Project: Shop Rite Food Store

Project #: 27337.01

Location: Milwaukee, Wisconsin

Date Sampled: 10/1/91

		Reporting	3407-001	3407-002	3407-003
	Compound	Limits (ug/L)	Well B1 (Groundwater)	Well B2 (Groundwater)	Bailer Blank
	Benzene	1.0	<1.0	<1.0	<1.0
	Bromodichloromethane	1.0	<1.0	<1.0	< 1.0
•	Bromoform	1.0	<1.0	<1.0	< 1.0
	Bromomethane	$\tilde{2.0}$	< 2.0	< 2.0	< 2.0
	Carbon tetrachloride	1.0	<1.0	<1.0	<1.0
	Chlorobenzene	1.0	2.0	< 1.0	<1.0
	Chlorodibromomethane	1.0	<250 (a)	<1.0	< 1.0
	Chloroethane	2.0	<2.0	<2.0	< 2.0
	2-Chloroethylvinyl ether	10	< 10	< 10	< 10
	Chloroform	1.0	<1.0	<1.0	< 1.0
	Chloromethane	2.0	<2.0	<2.0	< 2.0
	1,2-Dichlorobenzene	1.0	<1.0	<1.0	<1.0
	1,3-Dichlorobenzene	1.0	<1.0	<1.0	< 1.0
	1,4-Dichlorobenzene	1.0	<1.0	<1.0	<1.0
	1,1-Dichloroethane	1.0	<1.0	<1.0	<1.0
	1,2-Dichloroethane	1.0	<1.0	<1.0	< 1.0
	1,1-Dichloroethene	1.0	1.8	<1.0	<1.0
	cis-1,2-Dichloroethene	1.0	560	<1.0	<1.0
	trans-1,2-Dichloroethene		5.8	<1.0	<1.0
	1,2-Dichloropropane	1.0	1.3	<1.0	<1.0
	cis-1,3-Dichloropropene	1.0	<1.0	<1.0	< 1.0
	trans-1,3-Dichloroproper	ne 1.0	<1.0	<1.0	<1.0
	Ethylbenzene	1.0	<1.0	<1.0	<1.0
	Methylene chloride	3.0	<3.0	<3.0	<3.0
	1,1,2,2-Tetrachloroethar		<1.0	<1.0	<1.0
	Tetrachloroethene	1.0	14000	<1.0	<1.0
	Toluene	1.0	16	<1.0	<1.0
	1,1,1-Trichloroethane	1.0	< 1.0	<1.0	<1.0
	1,1,2-Trichloroethane	1.0	<1.0	<1.0	< 1.0
	Trichloroethene	1.0	220	<1.0	<1.0
	Trichlorofluoromethane	1.0	<1.0	<1.0	<1.0
	Vinyl chloride	1.0	11	<1.0	<1.0
	m and p-Xylene	2.0	< 2.0	<2.0	< 2.0
	o-Xylene	1.0	<1.0	<1.0	<1.0

(a) Elevated quantitation limit necessary to overcome interference.

Method Reference: EPA-600, "Methods for Organic Chemical Analysis of Municipal and Industrial Wastewaters", July 1982. Method 601/602.

-1-

Ck'd: Jul App'd: 66 Date Issued: 10/16/9/

APPENDIX C

SOIL BORING LOGS, WELL CONSTRUCTION AND DEVELOPMENT FORMS FOR MW1 AND MW2

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acility/Project Na ESTATE OF		N L. TILTON 27337.01		e/Perm	ut/Mon	itoring	Numbe	r		g Numt IW1	er		
oring Drilled By (Firm nat	ne and name of crew chief)	Date I	Drilling	Started	l	Date l	Drilling	Comp	leted	Drilling Rotar		
&J Soil Testin	g Ltd.,	Eugene Lehman		9/2	0/91			9/20	/91		Kotar	y mori	
		VI Unique Well No. Common Well Name	Final	Static \	Vater L	evel	Surfac	e Eleva			Boreho		
		MW1	<u> </u>		Feet M	SL	Local	Grid I	Feet N		plicable	/4 in	nches
Soring Location tate Plane		N,E S/C/I					1	Ono L] N	piledolo,		
	W 1/4	of Section 36, T 8, N, R 21 E	W Lo	ng]		Pect [] S _		Feet	
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9 28 E	D D	∽ 5" ASPHALT.		Š	Gr.	30	<u>-</u>	ν <u>«</u> +	Ĕŏ	٦٦	L P	Δ,	ğ ŭ
1 14 11	-	5" ASPHALT. FILL: 4" Brown Fine to Medium Sand, Some					<u> </u>						SS
		Gravel. 12" Brown Fine to Medium Sand, Trace G	ravel.				70.0						<u> </u>
2 18 0	¥	Black Fine to Medium Sand, Trace Gravel											SS
	5	Cinders. Note: Water Observed at 4.0 Feet Above Clay	_				105.0						
3 20 5	 	Layer. FILL: Brown Lean Clay, Trace Fine to Mediu.	/ n		曲曲								SS
	E	Sand and Gravel. Note: Grading into Grayish Black in Color.	[50.0			ļ	ļ		ļ
4 24 16	+	Organic Wood Pieces Noted at 5.0 Feet.											SS
	10	Stiff Brown Mottled Lean CLAY, Little Fine Medium Sand, Trace Gravel (CL).	o				100.0				ļ		
5 24 23		, , ,					7.5						SS
							7.5						
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7 15 1	F	Grayish Brown Lean CLAY, Little Fine to M Sand, Trace Gravel (CL).	edium				12.0						
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	25						7.0						
		End of Boring at 25.5 Feet.							,				
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violation is a separate offense, pursuant to ss 144.99 and 162.06, Wis. Stats.

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State of Wisconsin Department of Natural Resources Route to: Solid Waste Haz. Waste Waste Env. Response & Repair Underground Tank	MONITORING WELL CONSTRUCTION Form 4400-113A Rev. 4-90
Facility/Project Name Local Grid Location of Well	Well Name O
Shop Rite Suparmarket	ft. DE. Well Name BTMW1
Facility License, Permit or Monitoring Number Grid Origin Location Lat Long.	Wis: Unique:Well Number: DNR. Well Number
Type of Well Water Table Observation Well 🔀 11 St. Plane ft. N.	ft. E. Date Well Installed 09120191
Piezometer 12 Section Location of Waste/Source Boundary NU1/4 of SE 1/4 of Sec. 36,	Well Installed By: (Person's Name and Firm)
NA ft. Location of Well Relative to W.	Kenneth R Kuchn
Is Well A Point of Enforcement Std. Application? U Downgradient of Well Relative to Well R	Sidegradient / 1 2 2 Trac
A. Protective pipe, top elevation NA ft. MSL	1. Cap and lock? Ys 10 No 2. Proceedings coverping: Flush mount Cover
B. Well casing, top elevation $\triangle A = \dots = \text{ft. MSL}$	a. Inside diameter: _8. 1 in.
C. Land surface elevation 00000 ft. MSL	b. Length: 12. Qft. Steel 0 4
D. Surface seal, bottom ft_MSL or _1.8 ft.	Aluminum Ota X
12. USCS classification of soil near screen:	d. Additional protection?
GP GM CC GW SW CH SP CH	If yes, describe:
	3. Surface seal: Bentonite 30
Bedrock D	Concrete A 01
13. Sieve analysis, attached? Yes No	4. Material between well casing and protection priper Flushmount Cover
14. Drilling method used: Rotary 50	Bentonite 3 0
Hollow Stem Auger 41 Other □	Armular space seal 🔲 💥
	Sand Other X
15. Drilling fluid used: Water 0 0 2 Air 0 0 1	5. Annular space seal: (ChipS)a. Granular Bentonite 33
Drilling Mud 03 None 299	bLbs/gal mud weight Bentonite-sand shurry \[\sqrt{35}
	c. Lbs/gal mud weight Bentonite slurry \(\sqrt{2} \) 3 1
16. Drilling additives used?	d % Bentonite Bentonite-cement grout D 50
Δ1Δ	e. 3 Ft 3 volume added for any of the above
DescribeNA	f. How installed: Tremie [] 01
17. Source of water (attach analysis):	Tremie pumped 02
NA	Gravity 🛛 08
	6. Bentonite seal: a. Bentonite granules 3 3
E. Bentonite seal, top ft. MSL or 1.5 ft.	b. 11/4 in. 13/8 in. 11/2 in. Bentonite pellets 1 32 c. Bentonite Chips Oter 1
F. Fine sand, top ft. MSL or ft.	7. Fine sand material: Manufacturer, product name & mesh size a Red Flint Sands and Gravels #45/55
G. Filter pack, top ft. MSL or _ 13.5 ft.	b. Volume added 2 ft ³ 8. Filter pack material: Manufacturer, product name and mesh size
H. Screen joint, top ft. MSL or _ 15.0 ft.	2 Red Flint Sands and Gravels #30
	b. Volume added 6 ft 3 9. Well casing: Flush threaded PVC schedule 40 23
	Flush threaded PVC schedule 80 (24
J. Filter pack, bottom ft. MSL or _ 25.5 ft.	10. Screen material: Flush Threaded AVC (40)
K. Borehole, bottom ft. MSL or _25.5 ft.	a. Screen type: Fectory cut X 11 Continuous slot 0 0 1
L. Borehole, diameter6.2 in.	b. Manufacturer Timco
M. O.D. well casing 225 in.	c. Slot size: d. Slotted length: 0. 010in. 10.0 ft.
N. I.D. well casing _2.00 in.	11. Backfill material (below filter pack): None 14 Other Other
I hereby certify that the information on this form is true and co	
C:	
Lone To Day and Way	rzgn, Inc
The state of the supremite DNR office	ce listed at the top of this form as required by chs. 144, 147 and 160, Wis. Stats.,
and ch. NR 141, Wis. Ad. Code. In accordance with ch. 144, Wis. Stats., failure	te to file this form may result in a forfeiture of not ness than \$10,000 for each
day of violation. NOTE: Shaded areas are for DNR use only. See instructions	for more information including where the completed form should be sent.

Env. Response &	•	ground Tanks Oth		
acility/Project Name Shop Rite Suparmarket	County Name Milwo	uKee.	Well Name B /	٠.
acility License, Permit or Monitoring Number		Wis: Unique Well: N	umber DNR Wel	l Number
. Can this well be purged dry?	Yes 🗆 No	11 Doub to Water	·Before Development	After Development
5. Inside diameter of well 6. Volume of water in filter pack and well casing 7. Volume of water removed from well 8. Volume of water added (if any) 9. Source of water added NA	41 61 42 62 70 20 10 51 50 3 2 min. 24. Z ft. 6.20 in. 18. Z gal. 9.0 gal	11. Depth to Water (from top of well casing) Date Time 12. Sediment in well bottom 13. Water clarity Fill in if drilling flutations and the solids 15. COD	Clear 10 Turbid) 15 (Describe) Brown in Color With many fines (Silt). Mb odor or Sheen observed:	Describe) Clear 20 Turbid 25 (Describe) Grown in (olor with many fina) (Sitt). No odor or Sheen observed. at solid waste facility: 1 mg/1
Well developed by: Person's Name and Firm		I hereby certify the	nat the above information is	s true and correct to the be
Name: Kenneth R Kueh, Firm: Warzen Inc.	√		Kenet R.	
		Firm:	Warzgh,	Inc.

Route to: Solid Waste | Haz. Waste | Wastewater |

State of Wisconsin Department of Natural Resources	Route to: Soli	d Waste	Haz. Waste	Wastew			TORING WEL 1400-113A	L CONSTRU Re	CTION v. 4-90
	Env. Response	Local Grid	Location of W	ell	<u> </u>	Well Name	7 0 =		
Facility/Project Name Shop Rite Supan	arkat		fr. DS		fr. 🗆 E.		•	Z WM	
Facility License, Permit or Monitori	ng Number	Grid Origin	Location	Long.	Ot		Well Number	DNX Well 1	אעוווים
Type of Well Water Table Observa	uion Well 🕱 11	St. Plane _		ft. N		Date Well It	0.7	12019	
Piezometer		Section Lo	cation of Was	ie/Source	bot n	\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \	m m		<u>Y</u>
Distance Well Is From Waste/Source	e Boundary ft.	NW1/4 of	<u>SE</u> 1/4 of Se	c. <u>36,</u> T.	<u> 8</u> N, R. <u>리 </u>			n's Name and Kuehn	
Is Well A Point of Enforcement Su		Location of u Up	of Well Relativ	nseWoost 2 □ s	e/Source idegradient		,		
☐ Yes			wngradient		lot Known	<u> </u>	arzyn	Inc.	
A. Protective pipe, top elevation	NA	ft. MSL			1. Cap and loc	k?	المالية	→ Ye	□ 1⁄2
B. Well casing, top elevation	NA	fi. MSL —		78	a. Inside dia		USNMOU	_	. 8. 1 in
C. Land surface elevation	00000	ft. MSL			b. Length:	•	`		12.0fc
D. Surface seal, bottom	_ ft_MSL or _	.1.8 ft.			c. Material:		m	Steel Other	
12. USCS classification of soil n			1.18	1/200	-:5:07	al protection?		D Ys	
GP TI GMTI GCTI G	W □ W □.	SP 🗆		1 1 3	\	escribe:			
SM D SC D MLD 1	AHD CT⊠	CH □	\[\frac{1}{2}\]		3. Surface sea	1:	<u>.</u>	Bentonite	
Bedrock []	m.v bo	×12.	(2) (2) (3) (3) (3) (3) (3) (3) (3) (3) (3) (3		1.51.5	-			. ⊠ 01
13. Sieve analysis attached?	•	1,76			4 Marial b	trueen well ca	sing and	Caber	stroutove
14. Drilling method used:	Kotary L w Stem Auger	30,			4. Material C	stwood wen co		Bentonit	
	Other I				•		Am	nular space sea	
	•	• • •	,			Sc	end	Other	: 💆 🧮
15. Drilling fluid used: Water	□02 Air [01			5. Annular s			mular Barrer	
Drilling Mud	□ 03° None)	⊠ 99	8		bL	bs/gal mud w	eight Benu	mite-sand shirt	ry 🗆 35
16. Drilling additives used?	□ Yes	⊠ %	\					Bentonite slurr	
		дто						ite-cement gro my of the abov	
Describe NA			8		f. How i		inc action for a		ıše □ 01
17. Source of water (attach anal	ysis):				1. 11041	indipor.		Tremie pumpe	±d □ 02
NA	•	_			• • •	``	,	Gravi	iy 🕱 08
			-		6. Bentonit			entonite garas	
E. Bentonite seal, top	ft. MSL or	1.5	ft					Bentonite pell	
F. Fine sand, top	ft. MSL or	110	ft.		7. Fine san	d material: 1	vlanufacturer, j	roduct name à	& mesh size
	_ '-		. \					avels #4	<u>\$</u> 155 ===
G. Filter pack, top	ft. MSL or	13.0	It.			me added	O,5	ft ³	and mesh size
T. C faint tam	ft. MSL or	150	ft. —					avels #	
H. Screen joint, top				江山		me added	3	ft ³	
I. Well bottom	ft. MSL o	r_25.0	ft.		9. Well c	using: I	Tush threaded	PYC schedule	40 💢 23
	6 1/01 -	- 255			_	1	line cusaced	PVC schedule	.80 □ 24 th== □
J. Filter pack, bottom	II. MSL 0	&っ.っ	****		10. Screen	material: Fl	ush three	ded Prc (s	
K. Borehole, bottom	ft. MSL c	or _ 25.5	ft.			een type:		Fector	yeut 🕱 11
L. Borehole, diameter								Continuous	s slot [] 01 Other []
L. Boreroie, diameter	Ω.	•			b. Ma	nufacturer	Timco		
M. O.D. well casing 2	. <u>25</u> in.				c. Slo	ot size: oned length:		•	10.01 0.010in
N 10 " " " " " " " " " " " " " " " " " "					\		low filter pack	:):	None X 14
N. I.D. well casing _2	. <u>00</u> in.				11. 5200				ov≖ □ (()
I hereby certify that the	information of	on this for	rm is true a	and corre	ect to the best	of my know	ledge.		
7.		1	11 mm	,					•
Signature	, Maxim	em		~ ~ ~ ·	rzgn, IL				

Please complete both sides of this form and return to the appropriate DNR office listed at the top of this form as required by chs. 144, 147 and 160, Wis. Stats., and ch. NR 141, Wis. Ad. Code. In accordance with ch. 144, Wis Stats., failure to file this form may result in a forfeiture of not less than \$10, nor more than \$5000 for each day of violation. In accordance with ch. 147, Wis. Stats., failure to file this form may result in a forfeiture of not more than \$10,000 for each day of violation. NOTE: Shaded areas are for DNR use only. See instructions for more information including where the completed form should be sent.

Env. Response & Re	pair 🛮 Under	ground Tanks 🔲 Othe	r D	
icility/Project Name Thop Rite Supamarket	County Name Milwa	ukee	Well Name B 2	
cility License, Permit or Monitoring Number	County Code ——	Wis. Unique Well Nu	mber DNR:Wel	l-Number
Can this well be purged dry?	5 D No	11 Denth to Water	·Before Development	After Development
surged with bailer and pumped surged with block and bailed surged with block and pumped surged with block, bailed and pumped compressed air bailed only pumped only pumped slowly Other 3. Time spent developing well 4. Depth of well (from top of well casisng) 5. Inside diameter of well 6. Volume of water in filter pack and well casing 7. Volume of water removed from well	1 1 2 2 2 0 10 10 51 50 L Zmin. 2.5ft. 20in. L. Zgal. L. Zgalgal.	Time 12. Sediment in well bottom 13. Water clarity	a _ 19.57ft. b 09/22/9/ m m d d y y c 7:38 p.m.	m m d d y y 8:05 p.m. 20.0 inches Clear 120 Turbid 25 (Describe) Brown in Color With 1.77 e Fir (Si/T). No ode or shoen observed. at solid waste facility:
Well developed by: Person's Name and Firm		11.		-
1.7		of my knowledge Signature:	Louis acove information i	s true and correct to the b
Name: Kenneth R Kuch Firm: Warzen, Inc	N	- -	KR K	
,		Firm:	Warzen, I	, h C

Route to: Solid Waste | Haz. Waste | Wastewater |

APPENDIX D

PROTOCOL FOR INSTALLATION OF GROUNDWATER MONITORING WELLS

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PROTOCOL FOR INSTALLATION OF GROUNDWATER MONITORING WELLS

Protocol for Groundwater Monitoring Well Installation and Sampling

Groundwater monitoring wells are installed using hollow stem auger (HSA) borings. Soil sampling is conducted during well installation, according to Warzyn's Subsurface Soil Sampling Protocol. The drilling and well installation are directed by Warzyn's Site Geologist, who logs geologic materials encountered during drilling, field screens auger cuttings and soil samples, and observes the drilling activities and supervises installation of groundwater monitoring wells.

Wells are constructed of 2-inch I.D. Schedule 40 flushjoint PVC riser pipe, above a 0.010-inch slot, flushjoint PVC screen. The annular space surrounding the screen is backfilled with silica sand filter pack to a height not less than 2 feet above the top of the well screen. A minimum of one foot of bentonite pellets or granular bentonite is placed above this backfill, to provide a low permeability seal at the ground surface. Well screens are positioned to monitor selected areas of the water column. In high traffic areas, a flushmount protective casing with a locking well cap is generally installed at the surface and secured with concrete. In low traffic areas, a "stick-up" locking protective casing and protective bumper posts are typically installed.

After installation, wells are developed using a stainless steel bailer by purging at least 5 to 10 well volumes of water from each well, or until the well water is visually clear. Wells are allowed to stabilize prior to sampling, to ensure the collected sample is representative of groundwater at the location. Prior to sample collection the wells are purged by removing a maximum of 3 to 5 well volumes, or until further yield cannot be achieved. Purging and sample collection is accomplished using a teflon or stainless steel bailer.

The bailer is decontaminated between wells using a tri-sodium phosphate (TSP) wash and triple distilled water rinse, as per U.S. EPA protocol. All samples are collected in laboratory glassware. All drilling equipment and tools are steam-cleaned prior to mobilization onto the site, between boreholes, and upon completion of the drilling program. Well materials are also steam-cleaned prior to installation.

In accordance with Warzyn's Site Safety Plan, a photoionization detector (PID) and explosimeter are used to monitor ambient air concentrations at the sampling locations. Personal protective equipment is utilized by site personnel during performance of sampling activities, as specified in the Site Safety Plan.

Groundwater samples are collected, placed in laboratory cleaned, glass jars and labeled, identifying sample number, location and date, and sampling personnel. Samples submitted for analysis are preserved on ice and shipped in a cooler overnight to Warzyn's analytical laboratory in Madison, Wisconsin. Warzyn standard chain of custody procedures are followed regarding shipment and receipt of samples. As part of the Quality Assurance/Quality Control (QA/QC) procedure for groundwater sampling, duplicate and trip blank samples may be collected and submitted for analyses. A duplicate consists of filling two sets of sample bottles using standard sampling equipment and procedures. A trip blank consists of two 40-ml vials prepared with distilled water and placed with the samples transported.

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