Department of Natural Resources

BRRTS CASE TRACKING FORM

Type of Case: LUST__ ERP X 453M__ 453P__ SER Form #1 April 30, 1997

ACTIVITY NO.: 02-65-152260 **FID NO.:** 265 007 820

County: WALWORTH
Site Name: EIKHORN WEBPRESS
Address: 550 S CENTURIA

Municipality: EIKHORN
Legal Desc.: ____ 1/4 ____ 1/4 Sec____ Tn____ Rng____E
Lat.: _____ Long.: _____

Initial Contact Date: 6/3/97
RP Letter ? YX N__ Date Mailed: 7/9/97
Closure Date: 12/05/97

Person/Firm Reporting: KATHRYN HAY, BRAUN

Phone: (414) 783-0880

Priority:
- ____ High
- ____ Medium
- ____ Low
- X Unknown

Funding Source:
- X RP
- ____ LTF
- ____ EF
- ____ SF
- ____ None
- ____ Other (describe below)

New Folder? YX N__
Your Initials KHT

- ____ EPA Emergency Response

Enforcement Authority:
- X Spill Law s. 292.11 Wis. Stats.
- ____ Envir. Repair Law s. 292.31 Wis. Stats.
- ____ Solid Waste NR 500
- ____ CERCLA
- ____ Aband. Container s. 292.41 Wis. Stats.
- ____ Other: _____
- ____ Wastewater (lagoons)
- ____ Haz Waste NR600

******************************PROGRAMS INVOLVED:** (L = Lead, S = Support)*******************************

- ____ Abandoned Containers
- ____ LUST
- ____ NR 600 Hazardous Waste
- ____ NR 500 Solid Waste
- ____ Spills
- ____ Superfund
- ____ Water Supply
- ____ Water Resources
- X Environmental Repair
- ____ DATCP
- ____ **DCOM**
- ____ *Code 76*

RESPONSIBLE PARTY is a X Company or a __Person
Company Name: ~~ABBE~~ EIKHORN WEBPRESS
Contact Person: DIANE LEE
Address: 11595 McCONNELL RD
WOODSTOCK IL
Phone: (815) 338-6750
CC: _____

CONSULTANT:
Company Name: BRAUN
Contact Name: KATHRYN HAY
Address: _____
Phone: (414) 783-0880
CC: (EG: lab) _____

IMPACTS: (enter P for potential, K for known)
- ____ Fire/Explosion Threat
- ____ Contaminated Private Well(s) _____ No. of Wells
- ____ Contaminated Public Well
- ____ Groundwater Contamination
- K Soil Contamination
- ____ Surface Water Impacts
- ____ Free Product
- ____ Storm Sewer Contam.
- ____ Sanitary Sewer Contam.
- ____ Air Contamination
- ____ Direct Contact
- ____ Concrete/Asphalt
- ____ Contained/Recovered
- ____ Other: _____

DRO = 330 ppm

SUBSTANCES:

	#Tanks/containers	Size
____ Leaded Gas		
____ Unleaded Gas		
____ Diesel		
____ Fuel Oil		
____ Unknown Hydrocbn		
____ Waste Oil		
____ Metals		
____ RCRA Haz. Waste		
____ VOCs		
____ Chlorinated Solvent		
____ PCBs		
____ Foundry Sand		
____ Misc. Fill		
____ Pesticides		
____ Leachate		
____ PAHs/SVOCs		
____ Oil & Grease		
X Other LUBRICATING OIL		

entered in BRRTS __/__/__ by _____ (initials)

~~PLEASE ASSIGN~~ PLEASE SEND RP LETTER THANKS!

State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Tommy G. Thompson, Governor
George E. Meyer, Secretary
Gloria L. McCutcheon, Regional Director

Southeast Region Annex
4041 N. Richards Street, Box 12436
Milwaukee, WI 53212-0436
TELEPHONE 414-229-0800
FAX 414-229-0810

December 5, 1997

FID #: 265007820
RR
Walworth Co.

Ms. Diane Lee
Elkhorn Webpress
11595 Mcconnell Rd.
Woodstock, IL 60098

RE: **Site Closure,** Elkhorn Webpress, 550 East Centralia Street, Elkhorn, Wisconsin

Dear Ms. Lee:

Based on the investigative and remedial documentation provided to the Wisconsin Department Of Natural Resources (WDNR), dated June 23 and August 6, 1997, by Braun Intertec Inc. on your behalf, it appears that the lubricating oil contamination at the above-named site has been remediated in compliance with the requirements of chs. NR 700 to NR 724, Wis. Adm. Code. Therefore, the Department considers this case closed. No further action is necessary at the site at this time. However, the case may be reopened pursuant to s. NR 726.09, Wis. Adm. Code, if additional information regarding site conditions indicates that contamination on or from the site poses a threat to public health, safety or welfare or the environment.

The WDNR appreciates the actions you have taken to investigate and remediate the contamination at this site. If you have any questions or comments, please feel free to contact me at (414)229-0847.

Sincerely,

Binyoti F. Amungwafor
Hydrogeologist.

CC: Ms. Michelle Freimund Braun Intectec Inc..
Case File

FID# 265007820
HW/NOT

BROWN

Brown Printing Company
Woodstock Division
11595 McConnell Road
PO Box 1149
Woodstock, Illinois
60098-7369
tel 815-338-6750
fax 815-338-6899

October 20, 1997

Mr. Dennis Hommen, Fire Chief
City of Elkhorn
13 S. Broad Street
Elkhorn, WI 53121

Mr. Loren Anderson, Administrator
Lakeland Hospital
P.O. Box 1002
Elkhorn, WI 53121

Mr. John Giese, Chief of Police
City of Elkhorn
404 N. Washington Street
Elkhorn, WI 53121

Ms. Sandy Miller
Wisconsin DNR
P.O. Box 12436
Milwaukee, WI 53212

Re: Brown Printing Company
Contingency Plan

To Whom It May Concern:

I have enclosed our updated Contingency Plan for your records. Elkhorn Webpress, Inc. was purchased by Brown Printing Company in September and changed the name of the company to Brown Printing Company - Woodstock Division (Elkhorn Plant). Please change your records accordingly.

If you have any questions on the updated plan, give me a call at (815) 334-2078, x247. Thank you.

Sincerely,

BROWN PRINTING COMPANY

Diane Lee

Diane Lee
Environmental Manager

Enclosure

a Gruner+Jahr Company

Postmarked 10/20/97

BROWN PRINTING COMPANY - WOODSTOCK DIVISION
(ELKHORN PLANT)
CONTINGENCY PLAN
10/20/97

This contingency plan is written in compliance with 40 CFR 265. It contains seven parts.

1. General Information
2. Emergency Coordinators
3. Implementation of the Contingency Plan
4. Emergency Coordinator Responsibilities
5. Emergency Equipment
6. Coordination Arrangements
7. Evacuation Plan

1. GENERAL INFORMATION

Brown Printing Company
550 E. Centralia St.
Elkhorn, WI 53121
(414) 723-4018

Operator: Brown Printing Company

Type of Facility: Printing Plant

Facility Site Plan: See Attachment #1

Emergency Coordinators: John Zoske, Dennis Krakofsky, Dave Hollister

Description of Activities:

- Printer of trade magazines using inks, solvents and trace adhesives
- Waste products are spent solvents used to clean manufacturing equipment (flash point 104 F). Other solvent waste generated is methyl ethyl ketone based ink (flash point 21 degrees F). Waste inks and oils are also generated (flash points over 200 degrees F).

2. EMERGENCY COORDINATORS

Plant Manager: John Zoske 763-9719

Principal (by shift): 1st shift: John Cherone
2nd shift: Dennis Krakofsky
3rd shift: Dave Hollister

Alternates: 1st shift: Ralph Snead 279-6495
2nd shift: Dennis Haltorp
3rd shift: Dave Stier

The coordinators can deputize other employees to assist them in an emergency.

One of the coordinators is on site or can be reached by phone.

3. IMPLEMENTATION OF THE CONTINGENCY PLAN

The contingency plan will be implemented if an incident could threaten human health or the environment. The emergency coordinator has full authority to make this decision.

4. EMERGENCY COORDINATOR'S RESPONSIBILITIES

A. Whenever there is an imminent or actual emergency situation, the Emergency Coordinator must immediately:
   1. Activate internal facility alarms or communication systems.
   2. Notify appropriate state or local agencies with designated response roles if their help is needed (911).

B. Whenever there is a release, fire or explosion, the Emergency Coordinator must immediately identify the character, exact source, amount and a real extent of any released materials.

C. Concurrently, the Emergency Coordinator must assess possible hazards to human health or the environment that may result from the (a) release, or (b) fire or explosion.

(a). CHEMICAL RELEASE - OUTSIDE **If the Emergency Coordinator determines that the facility has had a chemical release outside the building which could affect human health, safety or the environment, it must be reported as soon as possible possible, no matter what quantity of chemical is involved** (after clean-up has begun). For example, any spill down a sewer drain is to be called in. If a spill is determined not to pose any problem to human health, safety or the environment, see below to determine if calls still need to be made to the agencies.

Federal and state regulations differ on notification of certain chemicals in certain quantities. We'll review the most commonly used materials.

Blanket Wash: A spill of blanket wash of 10 gallons or more (100#),
Inkjet Chemicals: A spill of ink, make-up ink or wash of 10 gallons or more must be called in to:

1. US EPA 800-424-8802
2. WI DNR and State Emergency Response Commission:
   (Same Phone #:) 800-943-0003
3. Local Emergency Planning Committee: 414-741-4400 or 911
4. Emergency Spill Clean-up Contractor if spill is large, or the Fire Department requests it. Heritage Environmental:
   800-487-7455 or (847) 378-1600

Ink, Oil, Fountain Solution, Silicone: A spill must be called in if there is a potential to cause injury or harm to human health, safety or the environ-

ment. The call to be made would be to the WI DNR at 800-943-0003. If more help is necessary, the Fire Dept. (911) or Emergency Spill Contractor is to be called.

Diane Lee is to be contacted as soon as possible. She will complete the notification and paperwork to be submitted as a result of the spill.

The Material Safety Data Sheet should be referred to for specific hazardous chemicals involved (Attachment #2).

If it is determined that the spill is an Emergency Response situation; i.e. a spill of size or seriousness that plant personnel would be unable to clean up properly, an outside contractor will be notified to come in to clean up the release. We have contracted with Heritage Environmental Services to clean up a spill. The Fire Department will only contain the spill. The outside contractor will provide for treating, storing or disposing of recovered waste, contaminated soil or surface water or any other material that results from a release at a facility.

(a1.) CHEMICAL RELEASE - INSIDE If a spill occurs in the plant, contact your supervisor immediately. The WI DNR may have to be notified if there is a potential to cause injury or harm to human health, safety or the environment. The call to be made would be to the WI DNR at 800-943-0003.

The Spill Control Equipment is located in the Shipping Dock, Back Warehouse and in the Pressroom.

The personal protective equipment - gloves, coveralls, boots, is to be worn to clean up a spill. Absorbent material is in the Spill Control Kits and should be used to surround and clean up the spill. If a drain is located in the area, it must be plugged immediately. If the drum or tote has a hole in it, the Spill Control Kit has material to plug the hole. The resulting waste is to be put into the Spill Control Kit drum or an empty 55 gallon metal drum. Do not put the material into any other drum or receptacle.

If it is determined that the spill clean-up requires additional help, contact the Fire Department and Heritage Environmental Services at 800-487-7455 or 708-378-1600, our contract #R6256.

The Emergency Coordinator must ensure that in the affected area of the facility:

1. No waste that may be incompatible with the released material is treated, stored or disposed of until clean-up procedures are completed.

2. All emergency equipment listed in section 5 of the plan is cleaned and fit for its intended use before operations are resumed.

The owner or operator must notify the Department of Natural Resources Regional Administrator, local fire department and the insurance company that the facility is back in compliance.

(b) FIRE OR EXPLOSION - If the Emergency Coordinator determines that the facility has had a fire or explosion which could threaten human health or the environment outside the facility, be must report his findings as follows:

He should dial 911 for the appropriate agency (Fire or Police) to respond and indicate to them if he feels evacuation of local areas may be advisable (Refer to Fire Emergency Plan, Attachment #3).

D. During an emergency, the Emergency Coordinator must take all reasonable measures necessary to ensure that fires, explosions and/or releases do not occur, recur or spread to other hazardous materials at the facility.

E. If the facility stops operations in response to a fire, explosion or release, the Emergency Coordinator must monitor for leaks, pressure build-up, gas generation, ruptures in valves, pipes or other equipment, whenever this is appropriate.

5. EMERGENCY EQUIPMENT

A. Automatic Sprinkler System - entire plant is covered by heavy density, with the exception of Building #1, which has smoke alarms only.
B. Fire extinguishers are located throughout the plant and areas clearly marked and accessible.
C. Hazardous Waste Spill Control Equipment is available and located at the shipping dock, the warehouse where hazardous waste is stored and in the pressroom supervisor's office. They are in drums marked "Spill Control Equipment".
D. Hose outlets are available throughout the plant.
E. Fire hydrants are spotted around the plant along with outlets at pump house and city hydrants.
F. Telephone communication system is available for use in an emergency.
G. Alarm system - emergency alarm is triggered in an emergency when the sprinkler system is activated. Telephone communication system will be used to notify employees of emergency.
H. The plant is served by the City of Elkhorn Fire, Police and Paramedics.

6. COORDINATOR ARRANGEMENTS

City of Elkhorn **Fire Department (911)**
Police Department (911)
Rescue Squad (911)
Ambulance (911)

Lakeland Hospital Emergency Department (741-2120)
National Response Center (800-424-8802)
Emergency Spill Clean-Up: Heritage Environmental 800-487-7455 or

7. EVACUATION PLAN

Facility personnel will be evacuated if the Emergency Coordinator decides that their personal safety is in danger. If evacuation is necessary, the announcement will be made over the paging system. It is imperative that the evacuation be completed quickly and with a minimal amount of confusion. The building has well marked exits. Once the alarm is sounded, each one not assigned Emergency Action Duties is to stop what they are doing and proceed through any exit and go to the area immediately outside the office area. Once clear of the building, they should remain in their assigned area for an accurate head count. No one is to leave the area until the Emergency Coordinator gives further instructions.

10/6/97

BROWN PRINTING COMPANY - WOODSTOCK DIVISION
(ELKHORN PLANT)
550 E. Centralia Street, Elkhorn, WI 53121
FIRE PLAN
10/20/97

If a fire is spotted in the plant, contact your supervisor, who will call the fire department. He will assign one person to wait at the street to direct firemen to the area of the fire.

One of the Emergency Coordinators (or the Notifier) listed below will announce to employees where the fire is, what action should be taken and/or if evacuation of the building is necessary.

If it is necessary to leave the building, go to the parking lot area directly outside the front office. **DO NOT LEAVE THE AREA WITHOUT SUPERVISOR'S KNOWLEDGE. DO NOT RE-ENTER THE BUILDING.**

EMERGENCY COORDINATORS:

1st	JOHN ZOSKE	RALPH SNEAD
2nd	DENNIS HALTORP	DENNIS KRAKOFSKY
3rd	DAVE HOLLISTER	DAVE STIER

First Aid Employees:

1st	Joan Hellstern, Debbie Chocholek, Ralph Snead, Don Riese
2nd	Dennis Haltorp, Chris Paulson
3rd	Dave Hollister

EMERGENCY COORDINATOR'S DUTIES:

1. Contacts the Notifier, who will call the Fire/Police Department, and give them as many details as known.
2. Contacts the Sprinkler/Pump Controller and see that he is in place.
3. Assigns someone to wait at the front entrance to direct help to the proper area.
4. Arranges for evacuation of the area or entire plant, as necessary.
5. Double checks call to the Fire/Police Department.
6. Provides the Fire/Police Dept. with as much information as is known, and follows their directions pertaining to personnel and plant safety.
7. When fire is out, he contacts the Sprinkler/Pump Controller to shut off the proper valves.
8. Gives the "all clear" signal to supervisors to allow employees to return to building.
9. Organizes a clean-up crew for damaged areas.

SPRINKLER CONTROLLER:

1ST	GREGG KRAFT	BRAD HARER
2ND	DENNIS HALTORP	DENNIS KRAKOFSKY

3RD STEVE BALISTRERI DAVE HOLLISTER

DUTIES:

1. Be prepared to show where gas, electric disconnects are to the building.
2. Turn off sprinkler system when requested to by fire chief.
3. Follows instructions given by the Fire Chief or Emergency Coordinator.

NOTIFIER:

To be Assigned by Emergency Coordinator

Notifier's Responsibilities:

1. Immediately calls Fire/Police Department and gives as much information as is known as to location in the building, severity, etc. which has been relayed to them by the Emergency Coordinator.
2. Announces to employees there is a fire in the building and what action they should take.

SALVAGE SQUAD: After the fire is out and Fire Dept. has gone, the Salvage Squad will identify areas near the fire that have not been reached by either sprinkler system or fire hoses, and will spray these areas down with fire extinguishers. They will remain in the area for approximately one hour to be sure the fire does not re-start.

NOTHING IS TO BE MOVED UNTIL THE INSURANCE COMPANY HAS BEEN NOTIFIED AND HAS EITHER; SURVEYED THE DAMAGE, OR HAS AUTHORIZED THE COMPANY TO PHOTOGRAPH THE AREA.

After this is done, the CLEAN-UP CREW may begin removing the damaged articles.

CLEAN-UP CREW: Removes and disposes of damaged articles. Stops water from spreading. Moves damaged articles away from undamaged ones.

10/20/97

ewpcont.doc

fid 265007820
ERP

ELKHORN WEBPRESS INC.

(414) 723-4018

P.O. Box 800 -- 550 East Centralia Street
Elkhorn, Wisconsin 53121

September 16, 1997

Ms. Gloria McCutcheon, Regional Office Director
WI DNR, Southeast Region
2300 N. Martin Luther King Jr. Drive
P.O. Box 21436
Milwaukee, WI 53212

Re: Notification of Name Change
US EPA #WID063517890

Dear Ms. McCutcheon:

Elkhorn Webpress, Inc. has been purchased by Brown Printing Company and will now be known as Brown Printing Company - Woodstock Division (Elkhorn Plant). The address at 550 E. Centralia Street, P.O. Box 800, Elkhorn, WI 53121 will remain the same. Please change your records accordingly.

Also enclosed is a copy of the USEPA Notification of Regulated Waste Activity showing the name change.

If you have any questions, please call at (815) 338-6750.

Sincerely,

BROWN PRINTING COMPANY

Jerry E. Smith
Director of Manufacturing

Enclosure

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

Form Approved, OMB No. 2050-0028 Expires 10/31/99
GSA No. 0241 EPA-01

Please refer to Section V, Line-by-Line Instructions for Completing EPA Form 8700-12 before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).

Notification of Regulated Waste Activity

EPA United States Environmental Protection Agency

Date Received (For Official Use Only)

I. Installation's EPA ID Number *(Mark 'X' in the appropriate box)*

[ ] A. Initial Notification [X] B. Subsequent Notification *(Complete Item C)*

C. Installation's EPA ID Number: WID063517890

II. Name of Installation *(Includes company and specific site name)*

BROWN PRINTING COMPANY - WOODSTOCK DIVISION (ELKHORN PLANT)

III. Location of Installation *(Physical address not P.O. Box or Route Number)*

Street: 550 E CENTRALIA STREET

Street (Continued):

City or Town: ELKHORN | State: WI | Zip Code: 53121-

County Code: | County Name: WALWORTH

IV. Installation Mailing Address *(See Instructions)*

Street or P.O. Box: PO BOX 800

City or Town: ELKHORN | State: WI | Zip Code: 53121-

V. Installation Contact *(Person to be contacted regarding waste activities at site)*

Name (Last): LEE | (First): DIANE

Job Title: ENV MANAGER | Phone Number (Area Code and Number): 815-338-6750

VI. Installation Contact Address *(See Instructions)*

A. Contact Address Location [ ] Mailing [X]

B. Street or P.O. Box: PO BOX 1149

City or Town: WOODSTOCK | State: IL | Zip Code: 60098-

VII. Ownership *(See Instructions)*

A. Name of Installation's Legal Owner: BROWN PRINTING COMPANY

Street, P.O. Box, or Route Number: PO BOX 1549

City or Town: WASECA | State: MN | Zip Code: 56093-0517

Phone Number (Area Code and Number)	B. Land Type	C. Owner Type	D. Change of Owner Indicator	(Date Changed) Month	Day	Year
507-835-2410			Yes [X] No [ ]	09	09	97

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

Form Approved. OMB No. 2050-0039. Expires 10/31/92
GSA No. 0246-EPA-DT

ID - For Official Use Only

VIII. Type of Regulated Waste Activity *(Mark 'X' in the appropriate boxes. Refer to Instructions)*

A. Hazardous Waste Activity

1. Generator (See Instructions)
   - [ ] a. Greater than 1000kg/mo (2,200 lbs.)
   - [X] b. 100 to 1000 kg/mo (220-2,200 lbs.)
   - [ ] c. Less than 100 kg/mo (220 lbs)
2. Transporter (Indicate Mode in boxes 1-5 below)
   - [ ] a. For own waste only
   - [ ] b. For commercial purposes

Mode of Transportation
- [ ] 1. Air
- [ ] 2. Rail
- [ ] 3. Highway
- [ ] 4. Water
- [ ] 5. Other - specify

[ ] 3. Treater, Storer, Disposer (at Installation) Note: A permit is required for this activity, see Instructions.

4. Hazardous Waste Fuel
   - [ ] a. Generator Marketing to Burner
   - [ ] b. Other Marketers
   - [ ] c. Boiler and/or Industrial Furnace
     - [ ] 1. Smelter Deferral
     - [ ] 2. Small Quantity Exemption

Indicate Type of Combustion Device(s)
- [ ] 1. Utility Boiler
- [ ] 2. Industrial Boiler
- [ ] 3. Industrial Furnace

[ ] 5. Underground Injection Control

B. Used Oil Recycling Activities

1. Used Oil Recycling Marketer
   - [ ] a. Marketer Directs Shipment of Used Oil to Off-Specification Burner
   - [ ] b. Marketer Who First Claims the Used Oil Meets the Specifications
2. Used Oil Burner - Indicate Type(s) of Combustion Device
   - [ ] a. Utility Boiler
   - [ ] b. Industrial Boiler
   - [ ] c. Industrial Furnace
3. Used Oil Transporter - Indicate Type(s) of Combustion Device(s)
   - a. Transporter
   - b. Transfer Facility
4. Used Oil Processor/Re-refiner - Indicate Type(s) of Activity(ies)
   - [ ] a. Process
   - [ ] b. Re-refine

IX. Description of Regulated Wastes *(Use additional sheets if necessary)*

A. Characteristics of Nonlisted Hazardous Wastes. *(Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles; See 40 CFR Parts 261.20 - 261.24)*

1. Ignitable (D001)	2. Corrosive (D002)	3. Reactive (D003)	4. Toxicity Characteristic	(List specific EPA hazardous waste number(s) for the Toxicity characteristic contaminant(s))
X				

B. Listed Hazardous Wastes. *(See 40 CFR 261.31 - 33; See Instructions if you need to list more than 12 waste codes.)*

1	2	3	4	5	6
D001	F003	F005	D018	D035	
7	8	9	10	11	12

C. Other Wastes. *(State or other wastes requiring a handler to have an I.D. number; See Instructions.)*

1	2	3	4	5	6

X. Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature	Name and Official Title *(Type or print)*	Date Signed
Jerry E. Smith	Jerry E. Smith, Director Mfg.	9/18/97

XI. Comments

Note: Mail completed form to the appropriate EPA Regional or State Office. *(See Section III of the booklet for addresses.)*

SEP 15'97 10:11 No.006 P.05
ID:312-353-6519
TO EPA REG 5 KERB

WISCONSIN DEPARTMENT OF NATURAL RESOURCES

Case Summary and Close Out Form Instructions

RECEIVED
AUG 8 1997
D.N.R. SED Hqtrs.
Milwaukee, WI

Forms that are not completed correctly will be returned.

1. Shaded areas are for Department use only.

2. Provide a Case Summary and analytic tables along with the completed form. The information supplied should succinctly summarize the chronological history of the entire case, and should reinforce the justification for closure. Do not submit previously submitted reports as attachments.

3. The following items should be included as attachments to the form:

   ☒ Location map (USGS topographic map, 1:24,000 scale or plat map).

   ☒ Site map, per s. NR 716.09(2)(c).(scale 1"=10' to 1"=20', if possible), depicting sample locations which correspond to sample result tables.

   ☐ Groundwater flow maps, per s. NR 716.15(3)(g)5. N/A - Groundwater not part of site activities

   ☒ Cross section(s), per s. NR 716.15(3)(g)6,include source location(s), pre and post remediation contaminant levels, sample locations and extent of excavation. Included copy of boring log for only geoprobe boring performed on site.

   ☒ Maps depicting locations of water supply wells, wetlands, utilities and other potential receptors. Included on enclosed maps

   ☐ Sites with groundwater contamination must include detailed information on private wells (well depth, casing size, well use, sample data, etc.). Private well sample results must be submitted on Form 3300-67. N/A

   ☒ Applicable laboratory sample results, Chains of Custody and tables. (Note: In cases with large numbers of sample results, it may not be necessary to submit all of the laboratory sheets and Chain of Custody sheets. **Submit only samples necessary to make justification for closure.**)

   ☐ Feel free to use your own tables, just be consistent throughout the form with labeling the tables. Clearly identify Pre and Post remediation samples.

4. **DO NOT** submit the Close Out Form in a bound report.

5. The more concise and to the point the form is filled out the easier it will be for the Close Out Committee to understand and process in a timely manner.

WISCONSIN DEPARTMENT OF NATURAL RESOURCES

update 3/14/96

CASE SUMMARY AND CLOSE OUT FORM

RECEIVED
AUG 8 1997
D.N.R. SED Hqtrs.
Milwaukee, WI

UID # 265007820

Responsible Party Name/ Full Address: Elkhorn Webpress, Inc.
11595 McConnell Road
Woodstock, Illinois 60098

Site Name/Full Address: Elkhorn Webpress, Inc. 550 East Centralia Street, Elkhorn, Wisconsin

Legal Description: SW 1/4, NW 1/4, Sec 6, T 2 N, R 17 (E/W) DNR Case No. 02-65-152260 County: Walworth

Contaminant Type(s) Lubricating oil Quantity Released Unknown (very small amount)

Incident Type: (amount released if known): Leakage from a compressor line

Date of Incident/Discovered: May 9, 1997, visual observation of stained soil If Incident = LUST : Form 4 Pending? ___Yes___No

Depth to Groundwater/Flow Direction: N/A, Assumed to south based on local observations Perched Water? ___Y _X_N Depth:_____

Soil Type Clayey silt to silty sand near surface, sand and gravel at deeper depths Depth to Bedrock Approximately 130 feet

Potential Receptors: Tributary to Jackson Creek approximately 1½ miles south of the site.

Site Assessment Consultant: Braun Intertec Corporation

Investigation/Remediation Consultant: Braun Intertec Corporation

Certified Lab Testing Soils/Water: Great Lakes Analytical

Status of water supply wells within 1200 feet of the site?
None

Date Closure Submitted to DNR: August 4, 1997 Enforcement Actions or Permits Closed Out? _X_Yes _____No

CLOSE OUT COMMITTEE SIGN OFF: **Date:** _____

_____
(Signature)

_____
(Signature)

_____
(Signature)

_____
(Signature)

Attach Case Summary and Justification for Closure

SOIL
PRE-REMEDIATION OR INVESTIGATION ANALYTICAL RESULTS

Extent Defined? __X__Y ____N

Attach Table of Pre-remedial Soil Samples

SOIL
POST REMEDIATION ANALYTICAL RESULTS

Attach the Table for Post Remedial Soil Results

Remedial Action Completed? __X__Y ____N 720.19 analysis____Y __X__N (if Y attach supporting documentation)

Final Confirmation Sampling Methods: Collected soil sample from bottom of excavation.

Description of remedial action taken:
Excavated affected soils and treated and disposed off site.

Were Soils Excavated? __X__Y ___N Quantity: 2 to 3 cubic yards Disposal Method: Biopile treatment and cover at landfill.

Soil Disposal Form Attached? __X__Y ____N Final Disposal Location: Mallard Ridge - Waste Management Facility

GROUNDWATER ANALYTICAL RESULTS

Extent Defined? ____Y ____N __X__NA

Remedial Action Completed? ____Y ____N

Field Analyses? ____Y ____N Lab Analyses? ____Y ____N No. of Sampling Points:_____

Number of Sample Rounds:_____

#NR 141 Temporary Wells:_____#Recovery Sumps:_____

#Private Wells:_____For private wells, Form 3300-67 completed:_____

#Municipal Wells:_____#NR 141 Monitoring Wells:_____

Preventive Action Limit exceeded? ____Y___N (If yes, location)_____

Enforcement Standard exceeded? ___Y___N (If yes, location)_____

Attach Table of Groundwater Results

Description of remedial action taken:

Form completed by:
I certify that, to the best of my knowledge, the information presented on and attached to this form are true and accurate. This recommendation for case closure is based upon all available data as of August 6, 1997 (date). I have read the Case Summary and Close Out Form Instructions and all required information has been included.

Name: Michelle L. Freimund Firm Name: Braun Intertec Corporation

Affiliation with Site Owner: Consultant

Address: 3315 North 124th Street, Unit N

City: Brookfield State: Wisconsin Zip: 53005

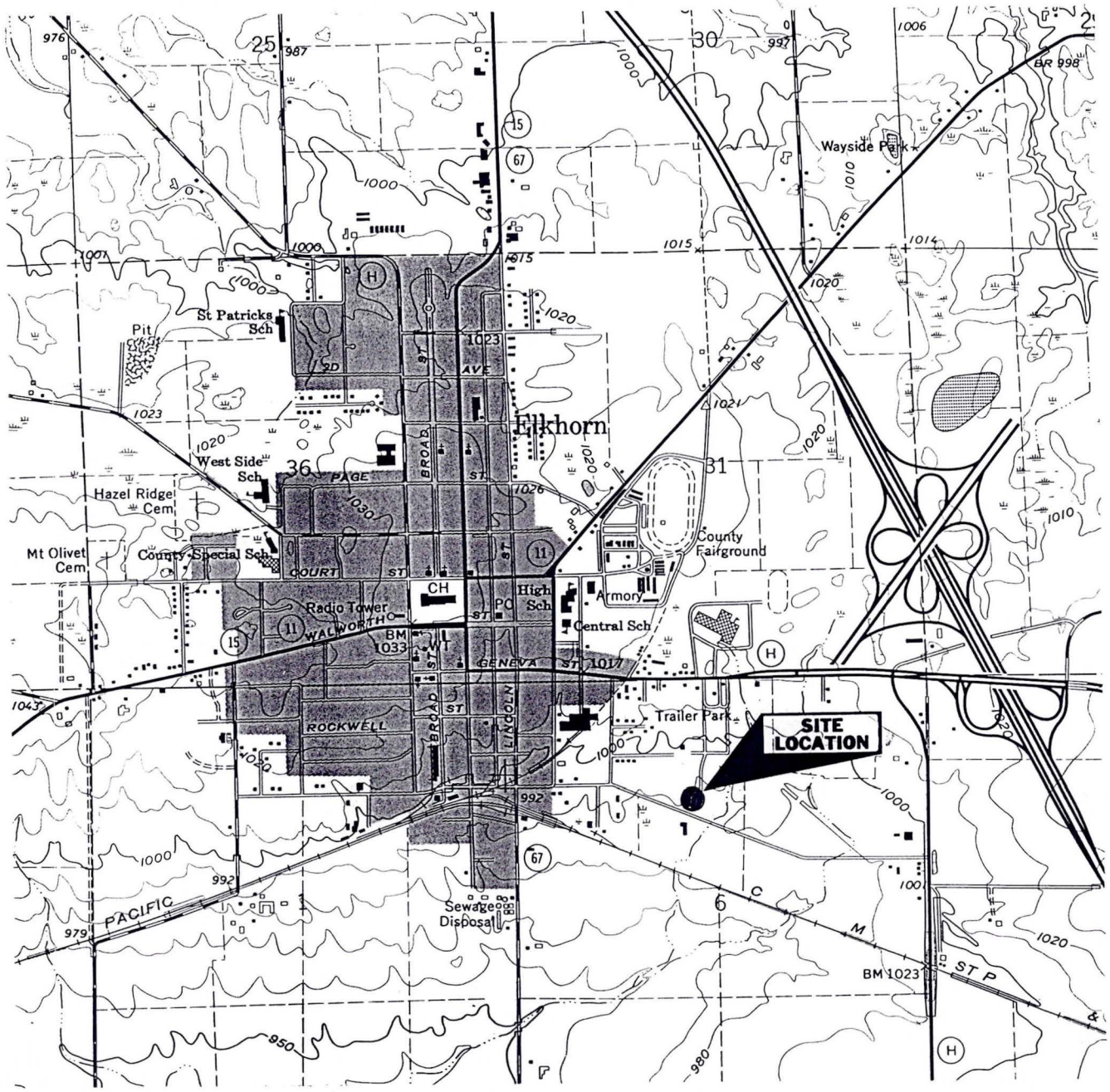
Telephone Number: (414) 783-0880

Michelle L. Freimund, P.G. #964, Hydrogeologist 8-6-97
(Signature)

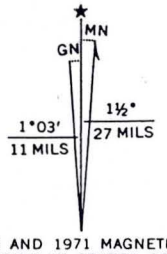
COMMITTEE RECOMMENDATION: **Date:** _____

Table 1.Soil Sample Laboratory Analytical Results Micrograms per kilogram (µg/kg)					
Parameter	Soil Sample I.D. East, 2'[a]	GP-1, 0'-2'[b]	GP-1, 4'-6'[b]	East Side, 4'[c]	WDNR Generic RCL[d]
FID Screening Results (ppm)	15	36	0	0	--
Benzo (a) anthracene	NA	120	<0.65	<0.58	NS
Benzo (a) pyrene	NA	230	<0.30	<0.58	NS
Benzo (ghi) perylene	NA	50	<2.6	<2.3	NS
Chrysene	NA	310	<2.6	<0.58	NS
Indeno (1,2,3-cd) pyrene	NA	900	<26	<23	NS
DRO[e]	230	<6.5	<6.7	<5.7	100

(a) Previously sampled during excavation activities on May 20, 1997.
(b) Sampled during geoprobe/investigation activities on June 6, 1997.
(c) Sampled during excavation activites on July 22, 1997.
(d) WDNR General Residual Contaminant Level per Table 1 in Wisconsin Administrative Code NR 720.09(4)
(e) Diesel Range Organics, in milligrams per kilogram (mg/kg)
NS No established standard (RCL)
NA Not analyzed



CONTOUR INTERVAL 10 FEET
DATUM IS MEAN SEA LEVEL



UTM GRID AND 1971 MAGNETIC NORTH DECLINATION AT CENTER OF SHEET

QUADRANGLE LOCATION

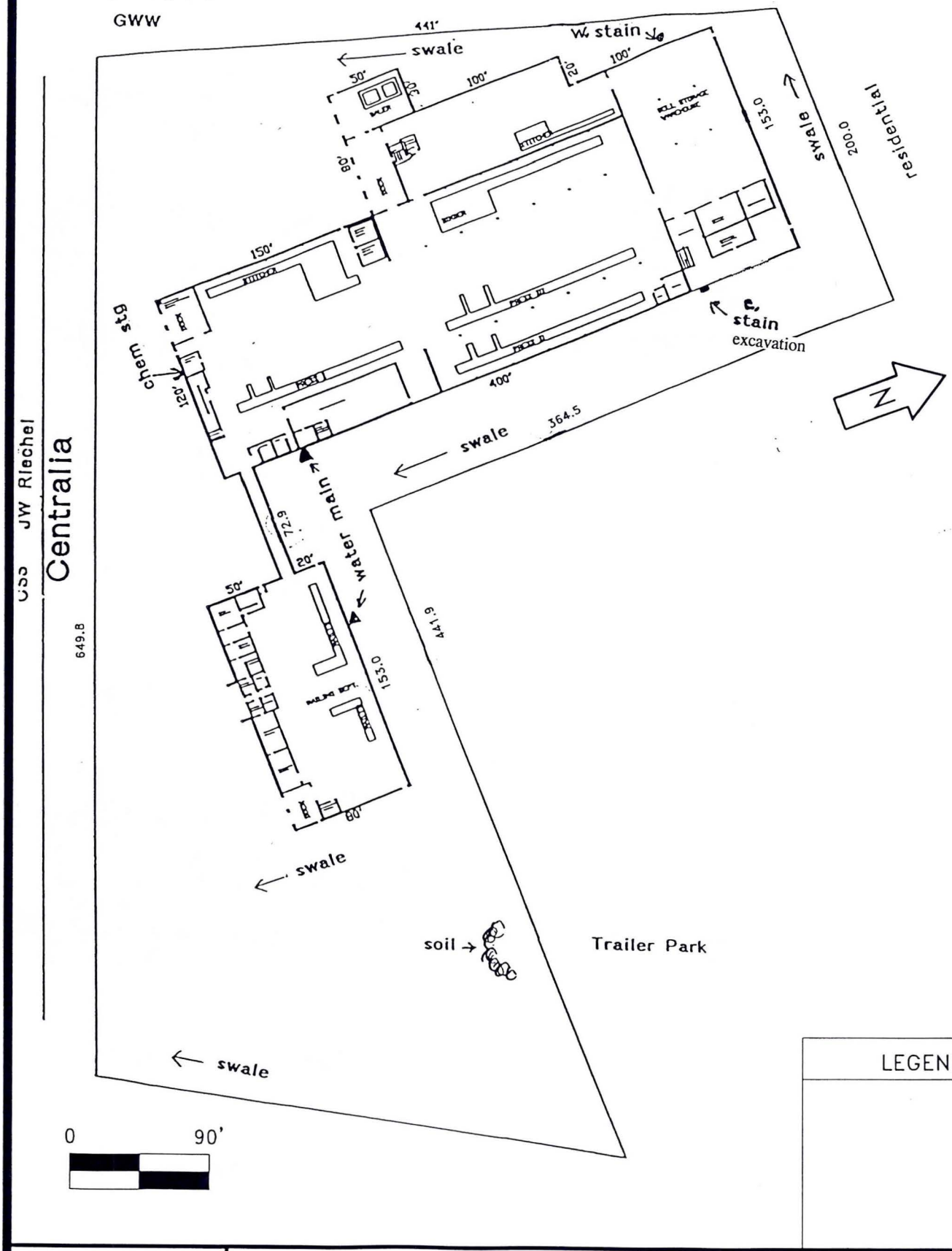
ELKHORN, WIS.
NE/4 DELAVAN 15' QUADRANGLE
N4237.5—W8830/7.5

1960
PHOTOREVISED 1971
AMS 3269 II NE—SERIES V861

BRAUN INTERTEC

SITE LOCATION MAP
Limited Remedial Investigation
Devon Group, Inc.
550 East Centralia Street
Elkhorn, Wisconsin

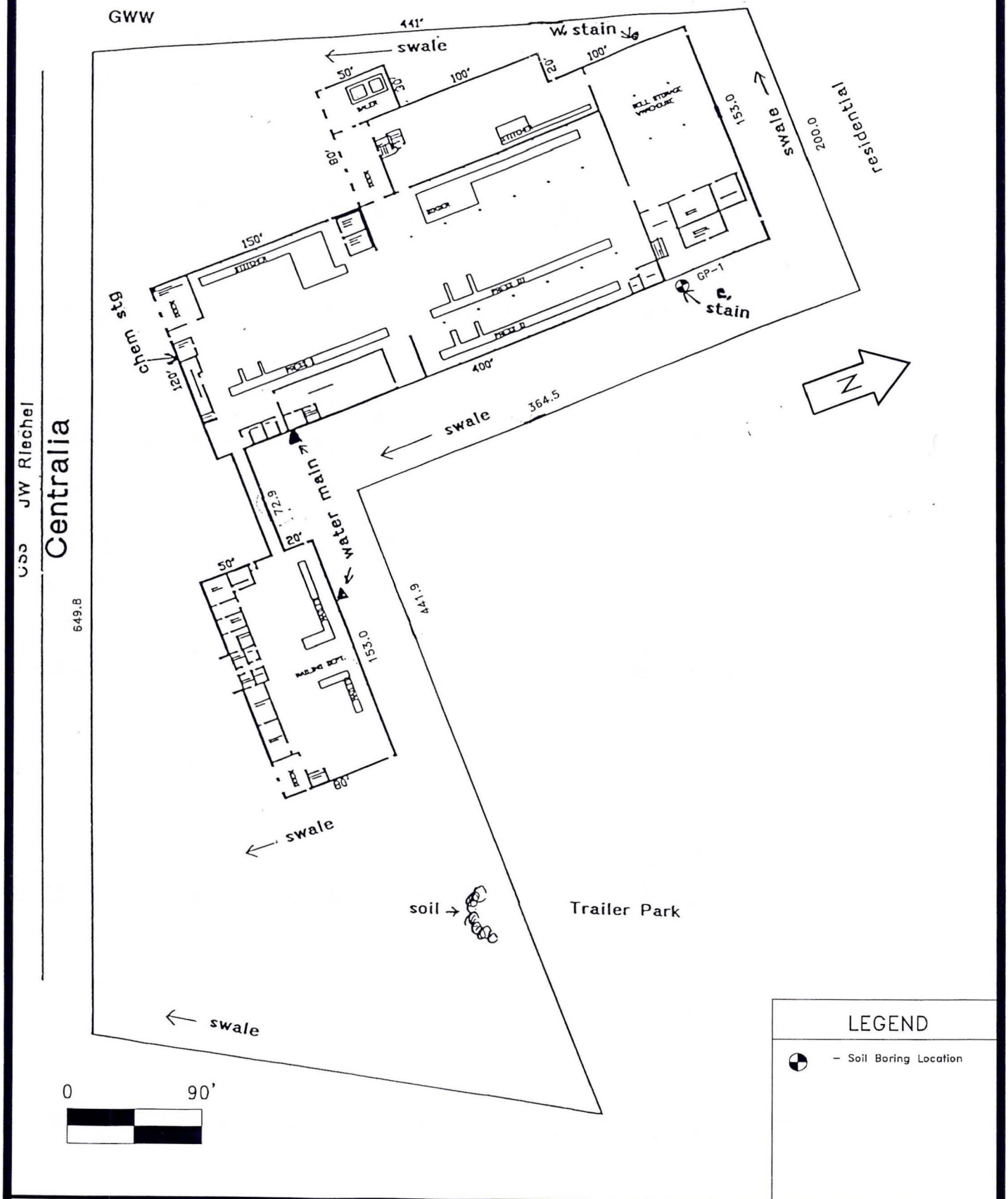
	INT	DATE	SHEET
DRAWN BY: MLF		6-10-97	1
APP'D BY: MLF		6-10-97	OF
RVS'D BY:			1
JOB No. LWXX-97-0120			
DWG No. SITELOC.DWG			FIGURE #
SCALE: 1:24,000			1



BRAUN INTERTEC

SITE LAYOUT MAP
Limited Remedial Investigation
Devon Group, Inc.
550 East Centralia Street
Elkhorn, Wisconsin

INT	DATE	SHEET
DRAWN BY: MLF	6-10-97	1
APP'D BY: MLF	6-10-97	OF
RVS'D BY:		1
JOB No. LWXX-97-0120		
DWG No. SITEMAPS.DWG		FIGURE # 2
SCALE: 1" = 90 feet		



LEGEND

- Soil Boring Location

BRAUN INTERTEC

SITE LAYOUT MAP
Limited Remedial Investigation
Devon Group, Inc.
550 East Centralia Street
Elkhorn, Wisconsin

	INT	DATE
DRAWN BY:	MLF	6-10-97
APP'D BY:	MLF	6-10-97
RVS'D BY:		
JOB No.	LWXX-97-0120	
DWG No.	SITEMAPS.DWG	
SCALE:	1" = 90 feet	

SHEET 1 OF 1

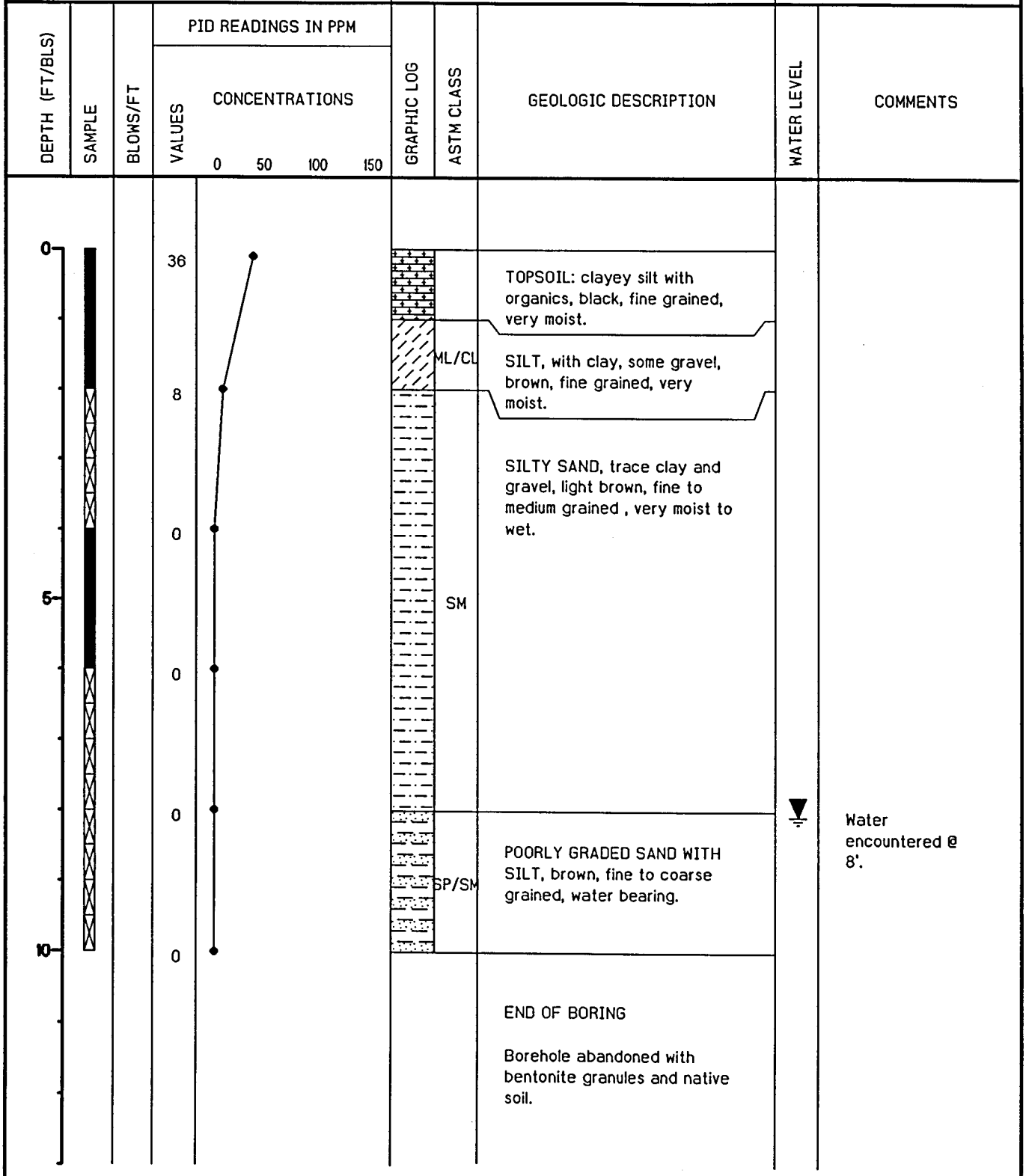
FIGURE # 2

LOG OF BORING

PROJECT NUMBER: LWXX-97-0120
PROJECT: DEVON GROUP, INC.
LOCATION: ELKHORN, WI
DATE: 6/6/97
PAGE: 1 OF 1

BORING NUMBER: GP-1
WELL NUMBER: ----
DRILLING METHOD: GEOPROBE
DRILLING COMPANY: BRIOHN ENV.
LOGGED BY: MLF

BRAUN INTERTEC



MIDWEST REGION
GENERATOR'S WASTE PROFILE SHEET

PLEASE PRINT IN INK OR TYPE

Waste Profile Sheet Code: MW 27544

Proposed Management Facility: Mallard Ridge RDF, Delavan, WI

This form is to be used to comply with the requirements of a waste agreement.

INSTRUCTIONS FOR COMPLETING THIS FORM ARE ATTACHED — Decision Expiration Date: / /

A. WASTE GENERATOR INFORMATION

1. Generator Name: Elkhorn Webpress, Inc.
2. SIC Code:
3. Facility Address (site of waste generation): 550 E. Centralia Street, Elkhorn, WI
4. Generator City, State: Elkhorn, WI
5. Zip/Postal Code: 53121
6. State ID #:
7. Technical Contact: Michelle Freimund
8. Phone: (414) 723 - 0880

B. WASTE STREAM INFORMATION (See Instructions)

1. Name of Waste: Contaminated Soil
2. Process Generating Waste: Compressor oil leak
3. Amount/Units: 3 cubic yards
4. Type A ☒ Type B ☐
5. Special Handling Instructions/Supplemental Information:
6. Incidental Waste Types and Amounts:

C. TRANSPORTATION INFORMATION

1. Method of Shipment: ☐ Bulk Liquid ☐ Bulk Sludge ☒ Bulk Solid ☐ Drum/Box ☐ Other
2. Supplemental Shipping Information:

D. PHYSICAL CHARACTERISTICS OF WASTE (See Instructions) (Omit for Type B)

1. Color	2. Does the waste have a strong incidental odor?	3. Physical State @ 70°F/21°C:	4. Layers	5. Specific Gravity	6. Free Liquids:
Brown	☒ No ☐ Yes; if so, describe:	☒ Solid ☐ Semi-Solid ☐ Liquid ☐ Powder ☐ Other:	☐ Multi-layered ☐ Bi-layered ☒ Single Phased	Range 1.5 - 2.75	☐ Yes ☒ No Volume: %

7. pH: ☐ ≤2 ☐ > 2-4 ☐ 4-7 ☐ 7 ☐ 7-10 ☐ 10- <12.5 ☐ ≥12.5 ☐ Range ☒ NA

8. Flash Point: ☒ None ☐ <140°F/60°C ☐ 140 - 199°F/60 - 93°C ☐ ≥200°F/93°C ☐ Closed Cup ☐ Open Cup

E. CHEMICAL COMPOSITION (Omit for Type B)

	RANGE (MIN-MAX)
1. Soil	100 %
	- %
	- %
	- %
	- %
	- %
	- %
	- %
	- %
Total:	100 %

The total composition must be greater than or equal to 100%. (.0001% = 1 ppm or 1 mg/l)

2. Does the waste contain any of the following? (provide concentration if known):

	NO	or	LESS THAN	or	ACTUAL
PCBs	☒		☐ < 50 ppm		ppm
Cyanides	☒		☐ < 50 ppm		ppm
Sulfides	☒		☐ < 50 ppm		ppm
Phenols	☒		☐ < 50 ppm		ppm

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AMPLING SOURCE (Omit for Type B, E.g., Drum, Lagoon, Pit, Pond, Tank, Vat) GP probe boring

G. REPRESENTATIVE SAMPLE CERTIFICATION (Omit for Type B)

1. Print Sampler's Name: Michelle Freimund
2. Sample Date: 6-6-97
3. Sampler's Title: Hydrogeologist
4. Sampler's Employer (if other than Generator): Braun Intertec Corporation

The sampler's signature certifies that any sample submitted is representative of the waste described above pursuant to 40 CFR 261.20(c) or equivalent rules.

5. Sampler's Signature Michelle L. Freimund

H. GENERATOR CERTIFICATION

By signing this profile sheet, the Generator certifies:

1. This waste is not "Hazardous Waste" as defined by USEPA and/or state regulation.
2. This waste does not contain regulated radioactive materials or regulated concentrations of PCB's (Polychlorinated Biphenyls).
3. The waste does not contain regulated concentrations of the following pesticides and herbicides: Chlordane, Endrin, Heptachlor (and it's epoxide). Lindane, Methoxychlor, Toxaphene, 2, 4-D, or 2, 4, 5-TP (Silvex).
4. The waste does not contain halogenated compounds such as: tetrachloroethylene, trichloroethylene, methylene chloride, 1, 1, 1-trichloroethane, carbon tetrachloride, chloroform, ortho-dichlorobenzene, dichlorodifluoromethane, 1, 1, 2-trichloro-1, 2, 2-trifluoroethane, trichlorofluoromethane 1, 1-dichloroehtylene, and 1, 2-dichloroethylene at greater than 1% (10,000ppm) total solvent concentration. This listing includes any combination of the above named halogenated compounds where the total concentration or the sum of the concentrations of the individual compounds exceed 1% or 10,000 ppm on a weight to weight basis.
5. This sheet and the attachments contain true and accurate descriptions of the waste material. All relevant information regarding known or suspected hazards in the possession of the Generator has been disclosed.
6. The Generator has read and understands the Contractor's Definition of Special Waste included in Part B.5. of the attached instructions form. All types and amounts of special wastes provided in incidental amounts have been identified in section B.6. of this form.
7. The analytical data presented herein or attached hereto were derived from testing a representative sample taken in accordance with 40 CFR 261.20(c) or equivalent rules.
8. If any changes occur in the character of the waste, the Generator shall notify the Contractor prior to providing the waste to the Contractor.

9. Signature Diane Lee
10. Title Environmental Director
11. Name (Type or Print) Diane Lee
12. Date 6-25-97

NOTE: Omit sections D., E., F., and G., for Type B waste.

Comments:

Please submit invoice to for review & it will be forwarded to Generator:
Braun Intertec Corporation
3315 N. 124th Street, Unit N
Brookfield, WI 53005

Waste Management of Wisconsin, Inc.
W124 N9355 Boundary Road
Menomonee Falls, WI 53051
414/253-8620 Fax: 414/253-1322
Toll Free: 1-888-964-4700

SERVICE AGREEMENT
NON-HAZARDOUS WASTE DISPOSAL

The above-named disposal facility and corporation are referred to herein as "Facility" and "Contractor," respectively.

CUSTOMER'S BILLING NAME
Elkhorn Webpress, Inc.

CUSTOMER'S BILLING ADDRESS
P.O. Box 800

CITY, STATE/PROVINCE, ZIP/POSTAL CODE
Elkhorn, WI 53121

CUSTOMER CONTACT
Diane Lee

PHONE NUMBER
(815) 334-2078, x 247

BANK REFERENCE
Attached

BANK CONTACT **PHONE NUMBER**
( )

Credit may be extended to Customer after appropriate credit information, in a form acceptable to Contractor, has been presented to and reviewed by Contractor. Contractor may, in its sole discretion, require a collateral deposit (in the form of cash, letter of credit or surety bond) acceptable to Contractor. It is the responsibility of the Customer to keep said collateral deposit current. Collateral deposits, where utilized, may be adjusted when there is an increase in disposal tonnage and/or rates. Collateral deficiencies must be corrected within 30 days of notice of required adjustment.

This is a legally binding contract, and Contractor agrees to provide and Customer agrees to accept the waste disposal services subject to the terms and conditions specified in this contract.

ESTIMATED MONTHLY AMOUNT OF WASTE FOR DISPOSAL:
3 cubic yards
(Include units e.g., cubic yards, pounds, kilograms)

SPECIAL INSTRUCTIONS:
See Section I on the attached Special Waste Management Decision (Profile No. .) for the approved management facility. Follow all conditions for disposal stated on the Special Waste Management Decision Section II B. All loads must be manifested.

INCIDENTAL SPECIAL WASTE TYPES AND AMOUNTS:

THE TERMS AND CONDITIONS ON REVERSE SIDE AND THE ATTACHED CONTRACTOR'S DEFINITION OF SPECIAL WASTE ARE PART OF THIS AGREEMENT.

CUSTOMER
Diane Lee
Authorized Signature
Env'l Director
Title

CONTRACTOR
Waste Management of Wisconsin, Inc.
Representative
Title

Printed on recycled paper

GREAT LAKES ANALYTICAL
1380 Busch Parkway • Buffalo Grove, Illinois 60089
(847) 808-7766 FAX (847) 808-7772

Braun Intertec, Inc.	Client Project ID:	Elkhorn Web Press	Sampled:	May 20, 1997
3315 N. 124th Street, Suite N	Matrix Descript:	Soil	Received:	May 21, 1997
Brookfield, WI 53005	Analysis Method:	WDNR DRO	Extracted:	May 28, 1997
Attention: Brenda Boyce	First Sample #:	705-3631	Analyzed:	May 28, 1997
			Reported:	May 29, 1997

DIESEL RANGE ORGANICS

Sample Number	Sample Description	Detection Limit mg/kg, Dry Weight (ppm)	High B.P. Hydrocarbons mg/kg, Dry Weight (ppm)	Chromatogram Description
705-3631	East 2'	27	230	Non Diesel Pattern, Diesel Range, Motor Oil Range, Elevated Baseline, Late Elevated Baseline & Peaks, Late Peaks
705-3632	West 1'	6.0	87	Non Diesel Pattern, Diesel Range, Motor Oil Range, Elevated Baseline, Late Elevated Baseline & Peaks, Late Peaks

High Boiling Point Hydrocarbons is performed as described in Leaking Underground Storage Tank Analytical Guidance, July 1993 WDNR SW 130 93 REV. Because matrix effects and/or other factors required additional sample dilution, detection limits for this sample have been raised.

GREAT LAKES ANALYTICAL

Kevin W. Keeley
Laboratory Director

7053631.BRW <2>

GREAT LAKES ANALYTICAL

CHAIN OF CUSTODY REPORT

1380 BUSCH PARKWAY
BUFFALO GROVE, ILLINOIS 60089-4505
(847) 808-7766 FAX (847) 808-7772

Client: Braun Intertec	Bill To: (same)	TAT: (5 DAY) 4 DAY 3 DAY 2 DAY 1 DAY < 24 HRS.
Address: 3315 N. 124th St.	Address:	DATE RESULTS NEEDED: 5-28-97
Brookfield, WI 53005	Job # LWXX-97-0112	TEMPERATURE UPON RECEIPT:
Report to: B. Boyce	Phone #: (414) 783-0850 Fax #: (414) 783-0890	State & Program: Phone #: ( ) Fax #: ( )
Project: Elkhorn Webpress		AIR BILL NO.
Sampler: Brenda Boyce		
PO/Quote #: B-013		

FIELD ID, LOCATION	DATE COLLECTED	TIME COLLECTED	SAMPLE MATRIX	PRESERVATIVES	NO. CONTAINERS	TYPE CONTAINERS	DRO	TS	SAMPLE CONTROL: CRACKED/BROKEN	SAMPLE CONTROL: IMPROPERLY SEALED	SAMPLE CONTROL: GOOD CONDITION	LABORATORY ID NUMBER
1 East 2'	5-20-97	11:00	Soil	No	2						✓	7053631
2 West 1'	↓	11:30	↓	↓	2		↓	↓			✓	7053632
3												
4												
5												
6												
7												
8												
9												
10												

RELINQUISHED	DATE/TIME	RECEIVED	DATE/TIME	RELINQUISHED	DATE/TIME	RECEIVED	DATE/TIME
Brenda L. Boyce	5-20-97	[signature]	5/21/97	[signature]	5/21/97 4:10	K. Kuell	5/21/97
RELINQUISHED	DATE/TIME	RECEIVED	DATE/TIME	RELINQUISHED	DATE/TIME	RECEIVED	DATE/TIME

COMMENTS:

PAGE 1 OF 1

3086-158

GREAT LAKES ANALYTICAL
1380 Busch Parkway • Buffalo Grove, Illinois 60089
(847) 808-7766 FAX (847) 808-7772

Date: June 17, 1997

Braun Intertec, Inc.
3315 N. 124th Street, Suite N
Brookfield, WI 53005
Attention: Michelle Freimund

Project: LWXX-97-0120

Enclosed are the results from 2 soil samples received at Great Lakes Analytical on June 9, 1997. The requested analyses are listed below:

SAMPLE#	SAMPLE DESCRIPTION	DATE OF COLLECTION	TEST METHOD
7061158	Soil, GP-1, 0-2	6/6/97	Chlorine, ASTM-D808 PCB , EPA 8080 TCLP VOC , EPA 8260 TCLP SVOC , EPA 8270 PAH , EPA 8310 Percent Solids, EPA 7.3.3.1.5 TCLP Lead, EPA 3015/7421 WDNR DRO
7061159	Soil: GP-2, 4-6	6/6/97	PAH , EPA 8310 Percent Solids, EPA 7.3.3.1.5 WDNR DRO

This report may not be reproduced, except in full, without the written approval of the laboratory.

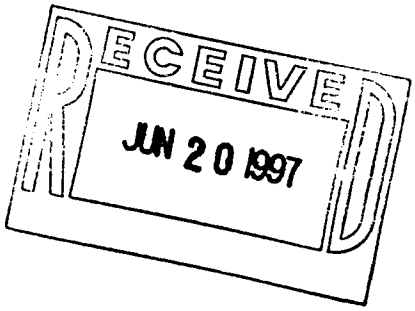
Please contact me if you have any questions. In the meantime, thank you for the opportunity to work with you on this project.

Very truly yours,

GREAT LAKES ANALYTICAL

Richard M. Howland /for

Kevin W. Keeley
Laboratory Director



7061158.BRW <1>

GREAT LAKES ANALYTICAL
1380 Busch Parkway • Buffalo Grove, Illinois 60089 (847) 808-7766 FAX (847) 808-7772

Braun Intertec, Inc.	Client Project ID:	LWXX-97-0120	Sampled:	Jun 6, 1997
3315 N. 124th Street, Suite N	Sample Descript:	Soil	Received:	Jun 9, 1997
Brookfield, WI 53005	Analysis for:	Percent Solids, EPA 7.3.3.1.5		
Attention: Michelle Freimund	First Sample #:	706-1158	Analyzed:	Jun 10, 1997
			Reported:	Jun 17, 1997

LABORATORY ANALYSIS FOR: Percent Solids, EPA 7.3.3.1.5

Sample Number	Sample Description	Detection Limit %	Sample Result %
706-1158	GP-1, 0-2	0.10	77
706-1159	GP-2, 4-6	0.10	75

GREAT LAKES ANALYTICAL

Kevin W. Keeley
Laboratory Director

7061158.BRW <1>

GREAT LAKES ANALYTICAL
1380 Busch Parkway • Buffalo Grove, Illinois 60089 (847) 808-7766 FAX (847) 808-7772

Braun Intertec, Inc.	Client Project ID:	LWXX-97-0120	Sampled:	Jun 6, 1997
3315 N. 124th Street, Suite N	Sample Descript:	TCLP Extract	Received:	Jun 9, 1997
Brookfield, WI 53005	Analysis for:	TCLP Lead, EPA 3015/7421		
Attention: Michelle Freimund	First Sample #:	706-1158	Analyzed:	Jun 12, 1997
			Reported:	Jun 17, 1997

LABORATORY ANALYSIS FOR: TCLP Lead, EPA 3015/7421

Sample Number	Sample Description	Detection Limit mg/L	Sample Result mg/L
706-1158	GP-1, 0-2	0.0050	N.D.

Analytes reported as N.D. were not present above the stated limit of detection.

GREAT LAKES ANALYTICAL

Kevin W. Keeley
Laboratory Director

7061158.BRW <2>

GREAT LAKES ANALYTICAL
1380 Busch Parkway • Buffalo Grove, Illinois 60089
(847) 808-7766 FAX (847) 808-7772

Braun Intertec, Inc.	Client Project ID:	LWXX-97-0120	Sampled:	Jun 6, 1997
3315 N. 124th Street, Suite N	Sample Descript:	Soil	Received:	Jun 9, 1997
Brookfield, WI 53005	Analysis for:	Chlorine, ASTM-D808		
Attention: Michelle Freimund	First Sample #:	706-1158	Analyzed:	Jun 10, 1997
			Reported:	Jun 17, 1997

LABORATORY ANALYSIS FOR: Chlorine, ASTM-D808

Sample Number	Sample Description	Detection Limit %	Sample Result %
706-1158	GP-1, 0-2	0.49	N.D.

Analytes reported as N.D. were not present above the stated limit of detection.

GREAT LAKES ANALYTICAL

Kevin W. Keeley
Laboratory Director

Please Note:
Chlorine analysis was performed at Robert E. Lee in Green Bay, WI.

7061158.BRW <3>

GREAT LAKES ANALYTICAL
1380 Busch Parkway • Buffalo Grove, Illinois 60089
(847) 808-7766 FAX (847) 808-7772

Braun Intertec, Inc.	Client Project ID:	LWXX-97-0120	Sampled:	Jun 6, 1997
3315 N. 124th Street, Suite N	Matrix Descript:	Soil	Received:	Jun 9, 1997
Brookfield, WI 53005	Analysis Method:	WDNR DRO	Extracted:	Jun 11, 1997
Attention: Michelle Freimund	First Sample #:	706-1158	Analyzed:	Jun 11, 1997
			Reported:	Jun 17, 1997

DIESEL RANGE ORGANICS

Sample Number	Sample Description	Detection Limit mg/kg, Dry Weight (ppm)	High B.P. Hydrocarbons mg/kg, Dry Weight (ppm)	Chromatogram Description
706-1158	GP-1, 0-2	6.5	N.D.	-----
706-1159	GP-2, 4-6	6.7	N.D.	-----

High Boiling Point Hydrocarbons is performed as described in Leaking Underground Storage Tank Analytical Guidance, July 1993 WDNR SW 130 93 REV. Analytes reported as N.D. were not present above the stated limit of detection. Because matrix effects and/or other factors required additional sample dilution, detection limits for this sample have been raised.

GREAT LAKES ANALYTICAL

Kevin W. Keeley
Laboratory Director

Certifications: AALA-461.01; US Army Corps of Engineers; Delaware HSS-IL069; Illinois EPA-100261; New Jersey DEP-54001; New York DOH-11487; Pennsylvania DEP-68-500; Tennessee DOH-02804; Tennessee DEC; Virginia DGS-00164; Wisconsin DNR-999917160

GREAT LAKES ANALYTICAL
1380 Busch Parkway • Buffalo Grove, Illinois 60089
(847) 808-7766 FAX (847) 808-7772

Braun Intertec, Inc.	Client Project ID:	LWXX-97-0120	Sampled:	Jun 6, 1997
3315 N. 124th Street, Suite N	Sample Descript:	Soil: GP-1, 0-2	Received:	Jun 9, 1997
Brookfield, WI 53005	Analysis Method:	EPA 8080	Extracted:	Jun 11, 1997
Attention: Michelle Freimund	Lab Number:	7061158	Analyzed:	Jun 16, 1997
			Reported:	Jun 17, 1997

POLYCHLORINATED BIPHENYLS (EPA 8080)

Analyte	Detection Limit µg/kg, Dry Weight	Sample Results µg/kg, Dry Weight
PCB 1016	65	N.D.
PCB 1221	65	N.D.
PCB 1232	65	N.D.
PCB 1242	65	N.D.
PCB 1248	65	N.D.
PCB 1254	65	N.D.
PCB 1260	65	N.D.

Analytes reported as N.D. were not present above the stated limit of detection. Because matrix effects and/or other factors required additional sample dilution, detection limits for this sample have been raised.

GREAT LAKES ANALYTICAL

Kevin W. Keeley
Laboratory Director

7061158.BRW <5>

GREAT LAKES ANALYTICAL
1380 Busch Parkway • Buffalo Grove, Illinois 60089
(847) 808-7766 FAX (847) 808-7772

Braun Intertec, Inc.	Client Project ID:	LWXX-97-0120	Sampled:	Jun 6, 1997
3315 N. 124th Street, Suite N	Sample Descript:	TCLP Extract: GP-1, 0-2	Received:	Jun 9, 1997
Brookfield, WI 53005	Analysis Method:	EPA 8260		
Attention: Michelle Freimund	Lab Number:	706-1158	Analyzed:	Jun 13, 1997
			Reported:	Jun 17, 1997

TCLP VOLATILES

Analyte	Detection Limit mg/L	Sample Results mg/L
Benzene	0.40	N.D.
Carbon tetrachloride	0.40	N.D.
Chlorobenzene	0.40	N.D.
Chloroform	0.40	N.D.
1,2-Dichloroethane	0.40	N.D.
1,1-Dichloroethylene	0.40	N.D.
Methyl ethyl ketone	100	N.D.
Tetrachloroethylene	0.40	N.D.
Trichloroethylene	0.40	N.D.
Vinyl chloride	0.16	N.D.

Analytes reported as N.D. were not present above the stated limit of detection.

GREAT LAKES ANALYTICAL

Kevin W. Keeley
Laboratory Director

7061158.BRW <6>

GREAT LAKES ANALYTICAL
1380 Busch Parkway • Buffalo Grove, Illinois 60089
(847) 808-7766 FAX (847) 808-7772

Braun Intertec, Inc.	Client Project ID:	LWXX-97-0120	Sampled:	Jun 6, 1997
3315 N. 124th Street, Suite N	Sample Descript:	TCLP Extract: GP-1, 0-2	Received:	Jun 9, 1997
Brookfield, WI 53005	Analysis Method:	EPA 8270	Extracted:	Jun 12, 1997
Attention: Michelle Freimund	Lab Number:	7061158	Analyzed:	Jun 17, 1997
			Reported:	Jun 18, 1997

TCLP SEMI-VOLATILES

Analyte	Detection Limit mg/L	Sample Results mg/L
o-Cresol	20	N.D.
m-, p-Cresol	20	N.D.
Cresol	20	N.D.
1,4-Dichlorobenzene	0.75	N.D.
2,4-Dinitrotoluene	0.013	N.D.
Hexachlorobenzene	0.013	N.D.
Hexachloro-1,3-butadiene	0.050	N.D.
Hexachloroethane	0.30	N.D.
Nitrobenzene	0.20	N.D.
Pentachlorophenol	10	N.D.
Pyridine	0.50	N.D.
2,4,5-Trichlorophenol	40	N.D.
2,4,6-Trichlorophenol	0.20	N.D.

Analytes reported as N.D. were not present above the stated limit of detection.

GREAT LAKES ANALYTICAL

Kevin W. Keeley
Laboratory Director

7061158.BRW <7>

GREAT LAKES ANALYTICAL
1380 Busch Parkway • Buffalo Grove, Illinois 60089 (847) 808-7766 FAX (847) 808-7772

Braun Intertec, Inc.	Client Project ID:	LWXX-97-0120	Sampled:	Jun 6, 1997
3315 N. 124th Street, Suite N	Sample Descript:	Soil: GP-1, 0-2	Received:	Jun 9, 1997
Brookfield, WI 53005	Analysis Method:	EPA 8310	Extracted:	Jun 12, 1997
Attention: Michelle Freimund	Lab Number:	706-1158	Analyzed:	Jun 12, 1997
			Reported:	Jun 17, 1997

POLYNUCLEAR AROMATIC HYDROCARBONS (EPA 8310)

Analyte	Detection Limit µg/kg, Dry Weight	Sample Results µg/kg, Dry Weight
Acenaphthene	260	N.D.
Acenaphthylene	520	N.D.
Anthracene	1.3	N.D.
Benzo (a) anthracene	**1.3**	**120**
Benzo (a) pyrene	**0.60**	**230**
Benzo (b) fluoranthene	2.6	N.D.
Benzo (ghi) perylene	**5.2**	**50**
Benzo (k) fluoranthene	1.3	N.D.
Chrysene	**5.2**	**310**
Dibenzo (a,h) anthracene	2.6	N.D.
Fluoranthene	130	N.D.
Fluorene	130	N.D.
Indeno (1,2,3-cd) pyrene	**52**	**900**
1-methyl Naphthalene	130	N.D.
2-methyl Naphthalene	130	N.D.
Naphthalene	13	N.D.
Phenanthrene	13	N.D.
Pyrene	52	N.D.

Analytes reported as N.D. were not present above the stated limit of detection. Because matrix effects and/or other factors required additional sample dilution, detection limits for this sample have been raised.

GREAT LAKES ANALYTICAL

Kevin W. Keeley
Laboratory Director

7061158.BRW <8>

GREAT LAKES ANALYTICAL
1380 Busch Parkway • Buffalo Grove, Illinois 60089
(847) 808-7766 FAX (847) 808-7772

Braun Intertec, Inc.	Client Project ID:	LWXX-97-0120	Sampled:	Jun 6, 1997
3315 N. 124th Street, Suite N	Sample Descript:	Soil: GP-2, 4-6	Received:	Jun 9, 1997
Brookfield, WI 53005	Analysis Method:	EPA 8310	Extracted:	Jun 12, 1997
Attention: Michelle Freimund	Lab Number:	706-1159	Analyzed:	Jun 12, 1997
			Reported:	Jun 17, 1997

POLYNUCLEAR AROMATIC HYDROCARBONS (EPA 8310)

Analyte	Detection Limit µg/kg, Dry Weight	Sample Results µg/kg, Dry Weight
Acenaphthene	130	N.D.
Acenaphthylene	260	N.D.
Anthracene	0.65	N.D.
Benzo (a) anthracene	0.65	N.D.
Benzo (a) pyrene	0.30	N.D.
Benzo (b) fluoranthene	1.3	N.D.
Benzo (ghi) perylene	2.6	N.D.
Benzo (k) fluoranthene	0.65	N.D.
Chrysene	2.6	N.D.
Dibenzo (a,h) anthracene	1.3	N.D.
Fluoranthene	65	N.D.
Fluorene	6.5	N.D.
Indeno (1,2,3-cd) pyrene	26	N.D.
1-methyl Naphthalene	65	N.D.
2-methyl Naphthalene	65	N.D.
Naphthalene	6.5	N.D.
Phenanthrene	6.5	N.D.
Pyrene	26	N.D.

Analytes reported as N.D. were not present above the stated limit of detection. Because matrix effects and/or other factors required additional sample dilution, detection limits for this sample have been raised.

GREAT LAKES ANALYTICAL

Kevin W. Keeley
Laboratory Director

7061158.BRW <9>

GREAT LAKES ANALYTICAL

CHAIN OF CUSTODY REPORT

1380 BUSCH PARKWAY
BUFFALO GROVE, ILLINOIS 60089-4505
(847) 808-7766 FAX (847) 808-7772

Client: Braun Intertec Corporation
Address: 3315 N. 124th St, Unit N
Brookfield, WI
Report to: M. Freimund
Phone #: (414) 783-0880
Fax #: (414) 783-0890

Bill To: Same
Address:
State & Program: WI
Phone #: ( )
Fax #: ( )

TAT: (5 DAY) 4 DAY 3 DAY 2 DAY 1 DAY < 24 HRS.
DATE RESULTS NEEDED: ~~ASAP~~ 6/16/97 as soon as analyzed
TEMPERATURE UPON RECEIPT: ON ICE
AIR BILL NO. GCA P/4

Project: LOXX-97-0120
Sampler: Michelle Freimund
PO/(Quote)#: G-102

	FIELD ID, LOCATION	DATE COLLECTED	TIME COLLECTED	SAMPLE MATRIX	PRESERVATIVES	NO. CONTAINERS	TYPE CONTAINERS	DRO	PAH (8310)	TCLP Lead/Solubility	Chlorine	PCB/8080	SAMPLE CONTROL: CRACKED/BROKEN	SAMPLE CONTROL: IMPROPERLY SEALED	SAMPLE CONTROL: GOOD CONDITION	LABORATORY ID NUMBER
1	GP-1, 0-2'	6/4/97	8:45am	soil	none	3		X	X	X	X	X			✓	7061158
2	GP-2, ~~0~~ 4-6'	↓	9:00am	↓	↓	3		X	X						✓	7061159
3																
4																
5																
6																
7																
8																
9																
10																

RELINQUISHED	DATE/TIME	RECEIVED	DATE/TIME	RELINQUISHED	DATE/TIME	RECEIVED	DATE/TIME
Michelle Freimund	6/4/97	[signature]		[signature]	6/4/97 3:30	K. Knoll	6/9/97
RELINQUISHED	DATE/TIME	RECEIVED	DATE/TIME	RELINQUISHED	DATE/TIME	RECEIVED	DATE/TIME

COMMENTS:

PAGE 1 OF 1

JG9958198

GREAT LAKES ANALYTICAL
1380 Busch Parkway • Buffalo Grove, Illinois 60089
(847) 808-7766 FAX (847) 808-7772

Date: July 30, 1997

Braun Intertec, Inc.
3315 N. 124th Street, Suite N
Brookfield, WI 53005
Attention: Michelle Freimund

Project: LWXX-97-0120

Enclosed are the results from 1 soil sample received at Great Lakes Analytical on July 22, 1997. The requested analyses are listed below:

SAMPLE#	SAMPLE DESCRIPTION	DATE OF COLLECTION	TEST METHOD
7074093	Soil: East Side, 4'	7/22/97	PAH , EPA 8310 Percent Solids, EPA 7.3.3.1.5 WDNR DRO

This report may not be reproduced, except in full, without the written approval of the laboratory.

Please contact me if you have any questions. In the meantime, thank you for the opportunity to work with you on this project.

Very truly yours,

GREAT LAKES ANALYTICAL

Kevin W. Keeley
Laboratory Director

RECEIVED
AUG 4 1997

Certifications: AALA-461.01; US Army Corps of Engineers; Delaware HSS-IL069; Illinois EPA-100261; New Jersey DEP-54001; New York DOH-11487; Pennsylvania DEP-68-500; Tennessee DOH-02804; Tennessee DEC; Virginia DGS-00164; Wisconsin DNR-999917160

GREAT LAKES ANALYTICAL
1380 Busch Parkway • Buffalo Grove, Illinois 60089
(847) 808-7766 FAX (847) 808-7772

Braun Intertec, Inc.	Client Project ID:	LWXX-97-0120	Sampled:	Jul 22, 1997
3315 N. 124th Street, Suite N	Sample Descript:	Soil	Received:	Jul 22, 1997
Brookfield, WI 53005	Analysis for:	Percent Solids, EPA 7.3.3.1.5		
Attention: Michelle Freimund	First Sample #:	707-4093	Analyzed:	Jul 25-28 , 1997
			Reported:	Jul 30, 1997

LABORATORY ANALYSIS FOR: Percent Solids, EPA 7.3.3.1.5

Sample Number	Sample Description	Detection Limit %	Sample Result %
707-4093	East Side, 4'	0.10	87

GREAT LAKES ANALYTICAL

Kevin W. Keeley
Laboratory Director

7074093.BRW <1>

GREAT LAKES ANALYTICAL
1380 Busch Parkway • Buffalo Grove, Illinois 60089
(847) 808-7766 FAX (847) 808-7772

Braun Intertec, Inc.	Client Project ID:	LWXX-97-0120	Sampled:	Jul 22, 1997
3315 N. 124th Street, Suite N	Matrix Descript:	Soil	Received:	Jul 22, 1997
Brookfield, WI 53005	Analysis Method:	WDNR DRO	Extracted:	Jul 25, 1997
Attention: Michelle Freimund	First Sample #:	707-4093	Analyzed:	Jul 27, 1997
			Reported:	Jul 30, 1997

DIESEL RANGE ORGANICS

Sample Number	Sample Description	Detection Limit mg/kg, Dry Weight (ppm)	High B.P. Hydrocarbons mg/kg, Dry Weight (ppm)	Chromatogram Description
707-4093	East Side, 4'	5.7	N.D.	—

High Boiling Point Hydrocarbons is performed as described in Leaking Underground Storage Tank Analytical Guidance, July 1993 WDNR SW 130 93 REV. Analytes reported as N.D. were not present above the stated limit of detection. Because matrix effects and/or other factors required additional sample dilution, detection limits for this sample have been raised.

GREAT LAKES ANALYTICAL

Kevin W. Keeley
Laboratory Director

7074093.BRW <2>

Certifications: AALA-461.01; US Army Corps of Engineers; Delaware HSS-IL069; Illinois EPA-100261; New Jersey DEP-54001; New York DOH-11487; Pennsylvania DEP-68-500; Tennessee DOH-02804; Tennessee DEC; Virginia DGS-00164; Wisconsin DNR-999917160

GREAT LAKES ANALYTICAL
1380 Busch Parkway • Buffalo Grove, Illinois 60089
(847) 808-7766 FAX (847) 808-7772

Braun Intertec, Inc.	Client Project ID:	LWXX-97-0120	Sampled:	Jul 22, 1997
3315 N. 124th Street, Suite N	Sample Descript:	Soil: East Side, 4'	Received:	Jul 22, 1997
Brookfield, WI 53005	Analysis Method:	EPA 8310	Extracted:	Jul 25, 1997
Attention: Michelle Freimund	Lab Number:	707-4093	Analyzed:	Jul 28, 1997
			Reported:	Jul 30, 1997

POLYNUCLEAR AROMATIC HYDROCARBONS (EPA 8310)

Analyte	Detection Limit µg/kg, Dry Weight	Sample Results µg/kg, Dry Weight
Acenaphthene	120	N.D.
Acenaphthylene	230	N.D.
Anthracene	0.58	N.D.
Benzo (a) anthracene	0.58	N.D.
Benzo (a) pyrene	0.26	N.D.
Benzo (b) fluoranthene	1.2	N.D.
Benzo (ghi) perylene	2.3	N.D.
Benzo (k) fluoranthene	0.58	N.D.
Chrysene	2.3	N.D.
Dibenzo (a,h) anthracene	1.2	N.D.
Fluoranthene	58	N.D.
Fluorene	5.8	N.D.
Indeno (1,2,3-cd) pyrene	23	N.D.
1-methyl Naphthalene	58	N.D.
2-methyl Naphthalene	58	N.D.
Naphthalene	5.8	N.D.
Phenanthrene	5.8	N.D.
Pyrene	23	N.D.

Analytes reported as N.D. were not present above the stated limit of detection. Because matrix effects and/or other factors required additional sample dilution, detection limits for this sample have been raised.

GREAT LAKES ANALYTICAL

Kevin W. Keeley
Laboratory Director

7074093.BRW <3>

Certifications: AALA-461.01; US Army Corps of Engineers; Delaware HSS-IL069; Illinois EPA-100261; New Jersey DEP-54001; New York DOH-11487; Pennsylvania DEP-68-500; Tennessee DOH-02804; Tennessee DEC; Virginia DGS-00164; Wisconsin DNR-999917160

GREAT LAKES ANALYTICAL

CHAIN OF CUSTODY REPORT

1380 BUSCH PARKWAY
BUFFALO GROVE, ILLINOIS 60089-4505
(847) 808-7766 FAX (847) 808-7772

Client: Braun Intertec Corporation
Address: 3315 N. 124th St. Unit N
Brookfield, WI 53005
Report to: Michelle Freimund Phone #: (414) 783-0880 Fax #: (414) 783-0890

Bill To: Same
Address:
State & Program: WI
Phone #: ( ) Fax #: ( )

TAT: (5 DAY) 4 DAY 3 DAY 2 DAY 1 DAY < 24 HRS.
DATE RESULTS NEEDED: 7-29-97
TEMPERATURE UPON RECEIPT: ON ICE
AIR BILL NO.

Project: LWXX-97-0120
Sampler: Michelle Freimund
PO/Quote #:

	FIELD ID, LOCATION	DATE COLLECTED	TIME COLLECTED	SAMPLE MATRIX	PRESERVATIVES	NO. CONTAINERS	TYPE CONTAINERS	DRO	PAH	SAMPLE CONTROL: CRACKED/BROKEN	SAMPLE CONTROL: IMPROPERLY SEALED	SAMPLE CONTROL: GOOD CONDITION	LABORATORY ID NUMBER
1	East Side, -4'	7/22/97	9:30am	Soil	—	2	60 ml glass	X	X			✓	7074093
2													
3													
4													
5													
6													
7													
8													
9													
10													

RELINQUISHED	DATE/TIME	RECEIVED	DATE/TIME	RELINQUISHED	DATE/TIME	RECEIVED	DATE/TIME
Michelle L. Freimund	7-22-97 11:25am	[signature]	7/22/97	[signature]	7/22/97 5:15	K. Krell	7/22
RELINQUISHED	DATE/TIME	RECEIVED	DATE/TIME	RELINQUISHED	DATE/TIME	RECEIVED	DATE/TIME

COMMENTS:

PAGE OF

BRAUN[SM]
INTERTEC

Braun Intertec
3315 North 124th Street, Unit N
Brookfield, Wisconsin 53005
414-783-0880 Fax: 783-0890

Engineers and Scientists Serving the Built and Natural Environments®

June 23, 1997

Project No. LWXX-97-0120

26500820
ERP

RECEIVED
JUL 23 1997
D.N.R. SED Hqtrs.
Milwaukee, WI

Mr. Robert Frasco
Devon Group, Inc.
281 Tresser Boulevard, Suite 501
Stamford, Connecticut 06901

Dear Mr. Frasco:

Re: Limited Remedial Investigation for the Elkhorn Webpress Site located at 550 East Centralia Street in Elkhorn, Wisconsin

Braun Intertec Corporation (Braun Intertec) appreciates the opportunity to perform this limited remedial investigation at the above referenced site. This investigation was performed to determine the depth of the impacted soil and the potential for groundwater impacts. This letter report is being submitted to present the results of the limited remedial investigation. A copy of this report has been submitted to Ms. Diane Lee at Graftek Press.

Background

During a Phase I Environmental Site Assessment (performed by Braun Intertec), two areas of surface staining were observed near down spouts and beneath a former discharge line from air compressors. A subsequent limited Phase II Site Assessment was performed by Braun Intertec to determine if there were any soil impacts. Soil samples were collected by hand at one and two foot depths, screened in the field for volatile organic compounds and submitted for laboratory analyses. According the laboratory analytical data, the stained soil area on the east side of the building had a diesel range organic (DRO) concentration of 230 milligrams per kilogram (mg/kg). This result was above the Wisconsin Department of Natural Resources (WDNR) Generic Residual Contaminant level for DRO in coarse soils of 100 mg/kg.

Field Investigation

Braun Intertec performed one Geoprobe boring in the stained soil area on the east side of the Elkhorn Webpress building to determine the vertical extent of the soil impacts. If a shallow groundwater table was encountered near the impacted soil zone, a groundwater sample for laboratory analysis was also to be obtained. The Geoprobe boring was performed approximately one foot to the west of the previous excavation activities from the limited phase II site assessment.

Soil Assessment

The Geoprobe boring, GP-1, was performed to a depth of ten feet below ground surface (bgs). The soil types encountered consisted of clayey silt from the surface to two feet bgs, the upper foot of which was black with organics (topsoil). A six foot layer of silty sand underlaid the clayey silt to a depth of eight feet bgs. Underlying the silty sand, a poorly graded sand with silt soil was encountered to the bottom depth of the boring, approximately ten feet bgs.

Soil samples from the soil boring tests were collected and field screened for volatile organic vapors using a flame ionization detector (FID) and headspace methods and submitted to the laboratory for analyses of polynuclear aromatic hydrocarbons (PAHs) and DRO. One sample was submitted to the laboratory for additional analyses of Waste Management's Soil Profile BIO-3, for suitability of soil treatment in a biopile. The results of the field screening indicated detectable volatile organic concentrations from 36 parts per million (ppm) from the surface to two feet bgs, to nondetectable beginning at four feet bgs to the bottom depth of the borings.

Groundwater Sampling

Groundwater was encountered at eight feet bgs while probing. An attempt was made to collect a groundwater sample through the Geoprobe borehole by inserting a three-quarter inch diameter PVC screen into the borehole. However, the high amount of silt present in the groundwater was plugging the screen slots, making the collection of a "sediment free" sample impossible.

Laboratory Analytical Results

Two soil samples were collected from the Geoprobe soil boring to define the vertical extent of soil contamination. The upper soil sample, collected from zero to two feet bgs, had detectable concentrations of a few PAHs, listed on Table 1. There were no detectable DRO results from the zero to two feet bgs sample. The lower soil sample, collected from four to six feet bgs, indicated DRO and PAHs concentrations were below the laboratory detection limits. A soil sample from the zero to two feet bgs zone was also submitted for laboratory analysis for biopile treatment and disposal. The results indicated that the soil is suitable for this type of treatment and disposal.

Conclusions and Recommendations

Based on the results of this and the previous site activities, the vertical extent of soil contamination in this area is from the surface to three to four feet bgs. The horizontal extent appears to be limited to a three foot square area, the approximate size of the visually stained area. Therefore, an estimated three cubic yards of affected soil are to be excavated and

removed from the site for treatment and disposal. It is recommended that a small backhoe be used to excavate the affected soil and that a soil sample be collected at the bottom of the excavation to verify the clean-up.

Braun Intertec is currently processing the necessary paper work for the application of the soil treatment and disposal with Waste Management of Wisconsin, Inc. If you have any questions or comments, please call Michelle Freimund at (800) 277-9116.

Sincerely,

Michelle L. Freimund

Michelle L. Freimund, P.G.
Hydrogeologist

Catherine Hay

Catherine Hay
Manager, Milwaukee Environmental Services

Enclosures: Table 1
Figure 1
Figure 2
Boring Log
WDNR Abandonment Form
Laboratory Analytical Report

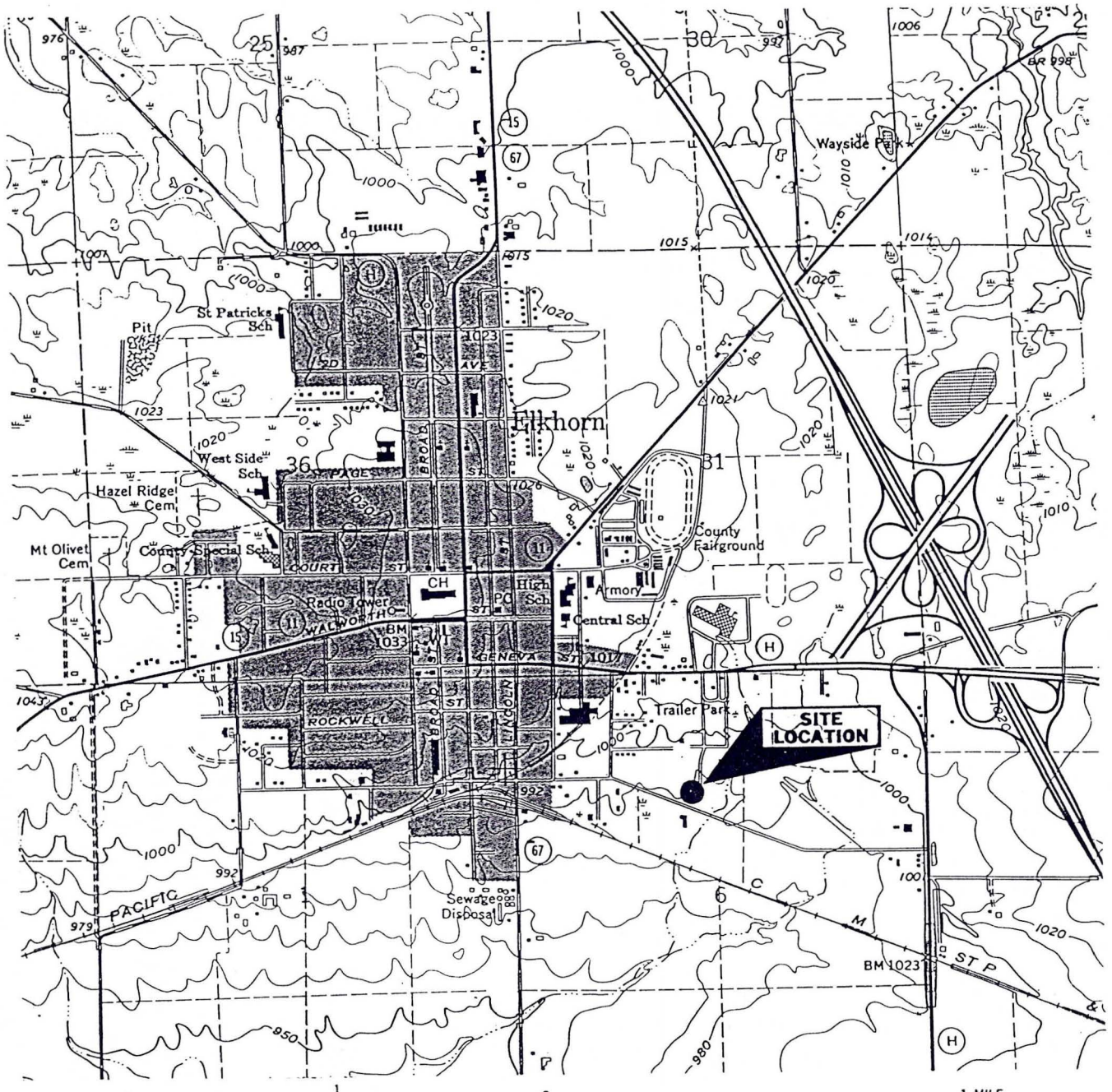
c: Ms. Diane Lee, Graftek Press - Woodstock Plant

mlf:chb\jkb\wp5.2+\p:\projects\lwxx-97.120\remsi.wpd\6-97

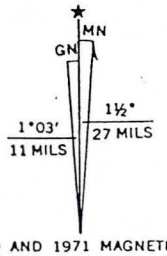
Table 1.Soil Sample Laboratory Analytical Results - June 6, 1997
Micrograms per kilogram (µg/kg)

Parameter	Soil Sample I.D. East, 2'[a]	GP-1, 0'-2'	GP-1, 4'-6'	WDNR Generic RCL[b]
Benzo (a) anthracene	NA	120	<0.65	NS
Benzo (a) pyrene	NA	230	<0.30	NS
Benzo (ghi) perylene	NA	50	<2.6	NS
Chrysene	NA	310	<2.6	NS
Indeno (1,2,3-cd) pyrene	NA	900	<26	NS
DRO[c]	230	<6.5	<6.7	100

(a) Previously sampled during excavation activities on May 20, 1997.
(b) WDNR General Residual Contaminant Level per Table 1 in Wisconsin Administrative Code NR 720.09(4)
(c) Diesel Range Organics, in milligrams per kilogram (mg/kg)
NS No established standard (RCL)
NA Not analyzed



CONTOUR INTERVAL 10 FEET
DATUM IS MEAN SEA LEVEL



UTM GRID AND 1971 MAGNETIC NORTH DECLINATION AT CENTER OF SHEET

QUADRANGLE LOCATION

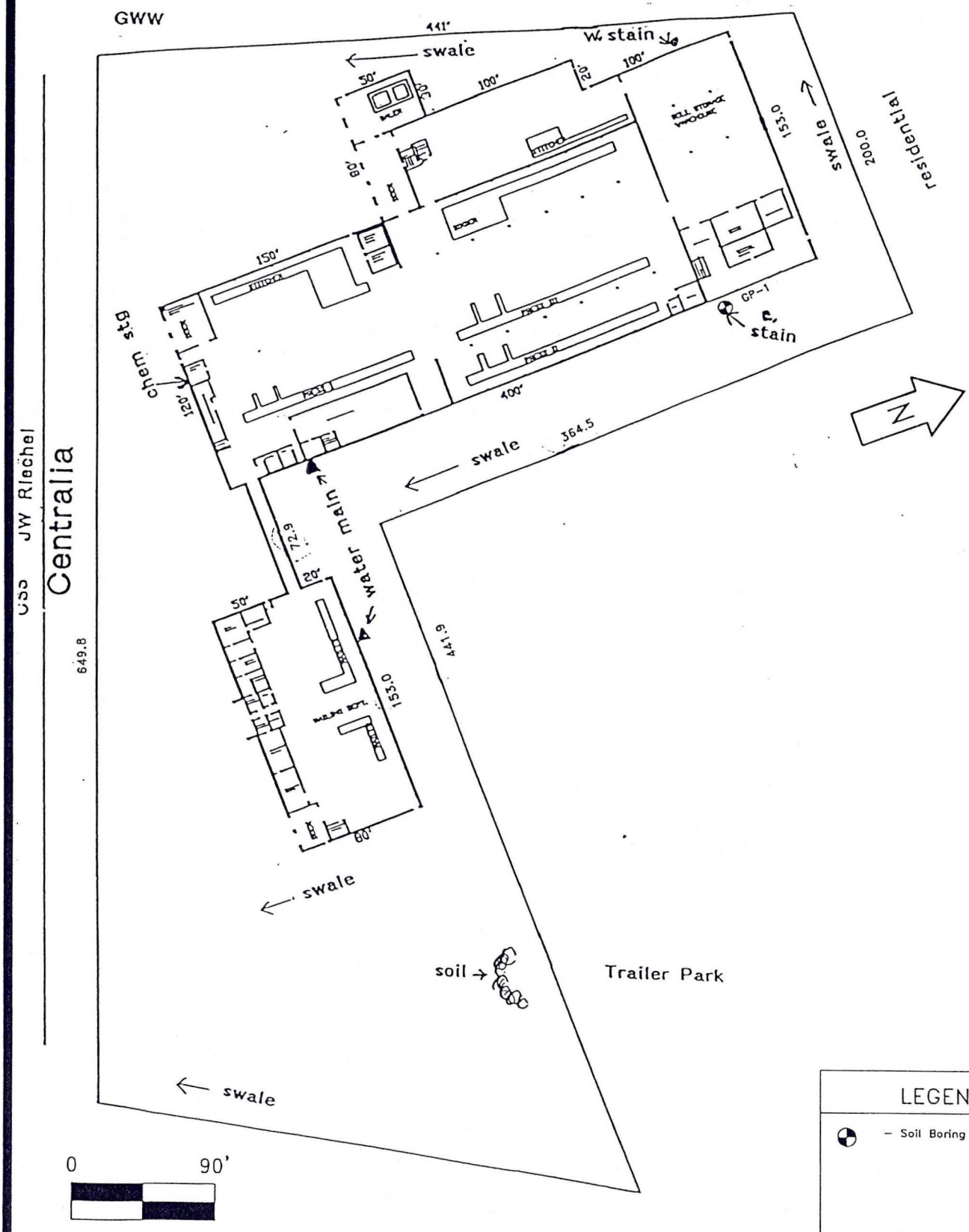
ELKHORN, WIS.
NE/4 DELAVAN 15' QUADRANGLE
N4237.5—W8830/7.5

1960
PHOTOREVISED 1971
AMS 3269 II NE—SERIES V861

BRAUN INTERTEC

SITE LOCATION MAP
Limited Remedial Investigation
Devon Group, Inc.
550 East Centralia Street
Elkhorn, Wisconsin

	INT	DATE	SHEET
DRAWN BY:	MLF	6-10-97	1
APP'D BY:	MLF	6-10-97	OF
RVS'D BY:			1
JOB No.	LWXX-97-0120		
DWG No.	SITELOC.DWG		FIGURE #
SCALE:	1:24,000		1



LEGEND

– Soil Boring Location

BRAUN INTERTEC

SITE LAYOUT MAP
Limited Remedial Investigation
Devon Group, Inc.
550 East Centralia Street
Elkhorn, Wisconsin

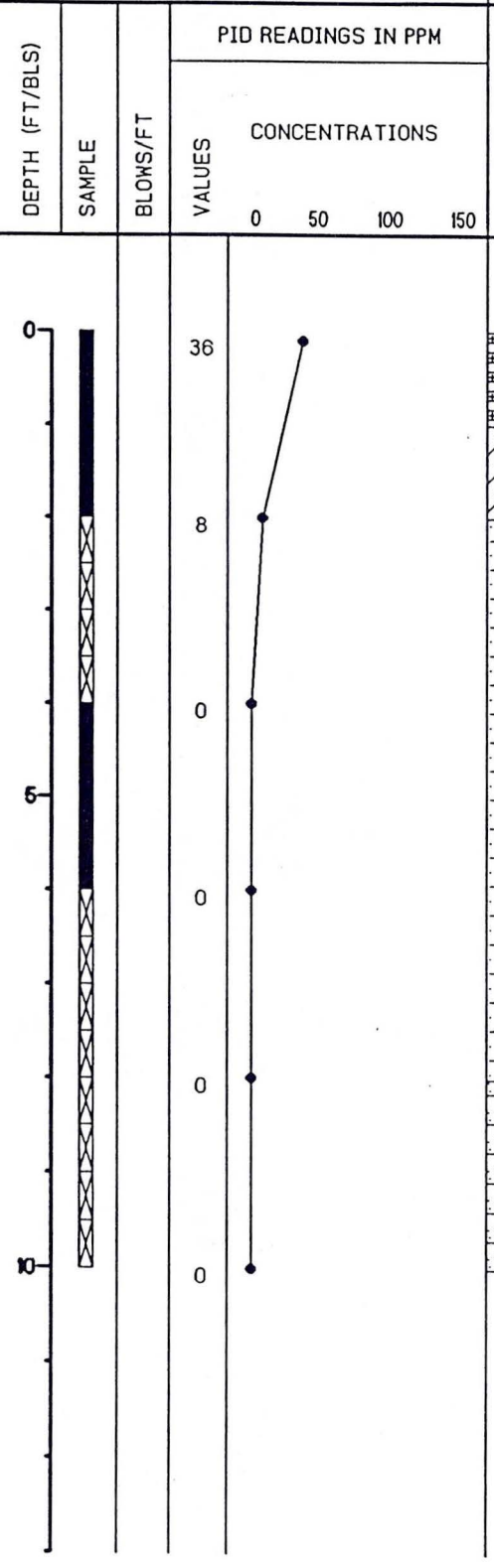
	INT	DATE	SHEET
DRAWN BY:	MLF	6-10-97	1
APP'D BY:	MLF	6-10-97	OF
RVS'D BY:			1
JOB No.	LWXX-97-0120		
DWG No.	SITEMAPS.DWG		FIGURE # 2
SCALE:	1" = 90 feet		

LOG OF BORING

PROJECT NUMBER: LWXX-97-0120
PROJECT: DEVON GROUP, INC.
LOCATION: ELKHORN, WI
DATE: 6/6/97
PAGE: 1 OF 1

BORING NUMBER: GP-1
WELL NUMBER: ----
DRILLING METHOD: GEOPROBE
DRILLING COMPANY: BRIOHN ENV.
LOGGED BY: MLF

BRAUN INTERTEC



GRAPHIC LOG	ASTM CLASS	GEOLOGIC DESCRIPTION	WATER LEVEL	COMMENTS
		TOPSOIL: clayey silt with organics, black, fine grained, very moist.		
	ML/CL	SILT, with clay, some gravel, brown, fine grained, very moist.		
	SM	SILTY SAND, trace clay and gravel, light brown, fine to medium grained , very moist to wet.		
	SP/SM	POORLY GRADED SAND WITH SILT, brown, fine to coarse grained, water bearing.	▼	Water encountered @ 8'.
		END OF BORING Borehole abandoned with bentonite granules and native soil.		

State of Wisconsin
Department of Natural Resources

WELL/DRILLHOLE/BOREHOLE ABANDONMENT

Form 3300-5B Rev. 3-94

All abandonment work shall be performed in accordance with the provisions of Chapters NR 111, NR 1 Admin. Code, whichever is applicable. Also, see instructions on back.

(1) GENERAL INFORMATION

Well/drillhole/Borehole Location

County: **Walworth**

__ 1/4 of **NW** 1/4 Sec. **6** ; T. **2** N; R. **17** [X] E [ ] W

(If applicable) Gov't Lot _____ Grid Number _____

Grid Location _____ ft. [ ] N. [ ] S., _____ ft. [ ] E. [ ] W.

Civil Town Name: **Elkhorn**

Street Address of Well: **550 E. Centralia Street**

City, Village: **City of Elkhorn**

(2) FACILITY NAME

Original Well Owner (If Known)

Present Well Owner: **Devon Group, Inc.**

Street or Route: **281 Tresser Blvd., Suite 501**

City, State, Zip Code: **Stamford, CT 06901**

Facility Well No. and/or Name (If Applicable): **GP-1**

WI Unique Well No: _____

Reason For Abandonment: **Borehole only**

Date of Abandonment: **06/06/97**

WELL/DRILLHOLE/BOREHOLE INFORMATION

(3) Original Well/Drillhole/Borehole Construction Completed On

(Date) **06/06/97**

[ ] Monitoring Well
[ ] Water Well
[ ] Drillhole
[X] Borehole

Construction Report Available? [X] Yes [ ] No

Construction Type:
[ ] Drilled [ ] Driven (Sandpoint) [ ] Dug
[X] Other (Specify) **Driven with geoprobe**

Formation Type:
[X] Unconsolidated Formation [ ] Bedrock

Total Well Depth (ft.) **10.0** (From groundsurface)
Casing Diameter (ins.) ____
Casing Depth (ft.) ____

Lower Drillhole Diameter (in.) **1.0**

Was Well Annular Space Grouted? [ ] Yes [ ] No [ ] Unknown
If Yes, To What Depth? _____ Feet

(4) Depth to Water (Feet) **8.0**

Pump & Piping Removed?	[ ] Yes	[ ] No	[X] Not Applicable
Liner(s) Removed?	[ ] Yes	[ ] No	[X] Not Applicable
Screen Removed?	[ ] Yes	[ ] No	[X] Not Applicable
Casing Left in Place?	[ ] Yes	[ ] No	

If No, Explain _____

Was Casing Cut Off Below Surface?	[ ] Yes	[ ] No	N/A
Did Sealing Material Rise to Surface?	[X] Yes	[ ] No	
Did Material Settle After 24 Hours?	[ ] Yes	[X] No	
If Yes, Was Hole Retopped?	[ ] Yes	[ ] No	N/A

(5) Required Method of Placing Sealing Material
[ ] Conductor Pipe-Gravity [ ] Conductor Pipe-Pumped
[ ] Dump Bailer [X] Other (Explain) **Gravity**

(6) Sealing Materials — For monitoring wells and monitoring well boreholes only
[ ] Neat Cement Grout
[ ] Sand-Cement (Concrete) Grout
[ ] Concrete
[ ] Clay-Sand Slurry
[ ] Bentonite-Sand Slurry
[ ] Chipped Bentonite
[ ] Bentonite Pellets
[X] Granular Bentonite
[ ] Bentonite- Cement Grout

(7) Sealing Material Used	From (Ft.)	To (Ft.)	No. Yards, Sacks Sealant or Volume (Circle One)	Mix Ratio or Mud Weight
Native soil material (topsoil)	Surface	**1.0**		
Bentonite granules	**1.0**	**10.0**		

(8) Comments: _____

(9) Name of Person or Firm Doing Sealing Work
Briohn Environmental/Braun Intertec Corp.

Signature of Person Doing Work: Michelle Freimuth
Date Signed: 6-23-97

Street or Route: **3315 N. 124th St., Unit N**
Telephone Number: **(414)-783-0880**

City, State, Zip Code: **Brookfield, WI 53005**

(10) FOR DNR OR COUNTY USE ONLY

Date Received/Inspected	District/County
Reviewer/Inspector	[ ] Complying Work [ ] Noncomplying Work
Follow-up Necessary	

DNR/COUNTY

LWXX-97-0120

GREAT LAKES ANALYTICAL
1380 Busch Parkway • Buffalo Grove, Illinois 60089
(847) 808-7766 FAX (847) 808-7772

Date: June 17, 1997

Braun Intertec, Inc.
3315 N. 124th Street, Suite N
Brookfield, WI 53005
Attention: Michelle Freimund

Project: LWXX-97-0120

Enclosed are the results from 2 soil samples received at Great Lakes Analytical on June 9, 1997. The requested analyses are listed below:

SAMPLE#	SAMPLE DESCRIPTION	DATE OF COLLECTION	TEST METHOD
7061158	Soil, GP-1, 0-2	6/6/97	Chlorine, ASTM-D808 PCB , EPA 8080 TCLP VOC , EPA 8260 TCLP SVOC , EPA 8270 PAH , EPA 8310 Percent Solids, EPA 7.3.3.1.5 TCLP Lead, EPA 3015/7421 WDNR DRO
7061159	Soil: GP-2, 4-6	6/6/97	PAH , EPA 8310 Percent Solids, EPA 7.3.3.1.5 WDNR DRO

This report may not be reproduced, except in full, without the written approval of the laboratory.

Please contact me if you have any questions. In the meantime, thank you for the opportunity to work with you on this project.

Very truly yours,

GREAT LAKES ANALYTICAL

Richard M. Rowland /for

Kevin W. Keeley
Laboratory Director

7061158.BRW <1>

GREAT LAKES ANALYTICAL
1380 Busch Parkway • Buffalo Grove, Illinois 60089
(847) 808-7766 FAX (847) 808-7772

Braun Intertec, Inc.	Client Project ID:	LWXX-97-0120	Sampled:	Jun 6, 1997
3315 N. 124th Street, Suite N	Sample Descript:	Soil	Received:	Jun 9, 1997
Brookfield, WI 53005	Analysis for:	Percent Solids, EPA 7.3.3.1.5		
Attention: Michelle Freimund	First Sample #:	706-1158	Analyzed:	Jun 10, 1997
			Reported:	Jun 17, 1997

LABORATORY ANALYSIS FOR: Percent Solids, EPA 7.3.3.1.5

Sample Number	Sample Description	Detection Limit %	Sample Result %
706-1158	GP-1, 0-2	0.10	77
706-1159	GP-2, 4-6	0.10	75

GREAT LAKES ANALYTICAL

Kevin W. Keeley
Laboratory Director

7061158.BRW <1>

GREAT LAKES ANALYTICAL
1380 Busch Parkway • Buffalo Grove, Illinois 60089
(847) 808-7766 FAX (847) 808-7772

Braun Intertec, Inc.	Client Project ID:	LWXX-97-0120	Sampled:	Jun 6, 1997
3315 N. 124th Street, Suite N	Sample Descript:	TCLP Extract	Received:	Jun 9, 1997
Brookfield, WI 53005	Analysis for:	TCLP Lead, EPA 3015/7421		
Attention: Michelle Freimund	First Sample #:	706-1158	Analyzed:	Jun 12, 1997
			Reported:	Jun 17, 1997

LABORATORY ANALYSIS FOR: TCLP Lead, EPA 3015/7421

Sample Number	Sample Description	Detection Limit mg/L	Sample Result mg/L
706-1158	GP-1, 0-2	0.0050	N.D.

Analytes reported as N.D. were not present above the stated limit of detection.

GREAT LAKES ANALYTICAL

Kevin W. Keeley
Laboratory Director

7061158.BRW <2>

GREAT LAKES ANALYTICAL
1380 Busch Parkway • Buffalo Grove, Illinois 60089
(847) 808-7766 FAX (847) 808-7772

Braun Intertec, Inc.	Client Project ID:	LWXX-97-0120	Sampled:	Jun 6, 1997
3315 N. 124th Street, Suite N	Sample Descript:	Soil	Received:	Jun 9, 1997
Brookfield, WI 53005	Analysis for:	Chlorine, ASTM-D808		
Attention: Michelle Freimund	First Sample #:	706-1158	Analyzed:	Jun 10, 1997
			Reported:	Jun 17, 1997

LABORATORY ANALYSIS FOR: Chlorine, ASTM-D808

Sample Number	Sample Description	Detection Limit %	Sample Result %
706-1158	GP-1, 0-2	0.49	N.D.

Analytes reported as N.D. were not present above the stated limit of detection.

GREAT LAKES ANALYTICAL

Please Note:
Chlorine analysis was performed at Robert E. Lee in Green Bay, WI.

Kevin W. Keeley
Laboratory Director

7061158.BRW <3>

GREAT LAKES ANALYTICAL
1380 Busch Parkway • Buffalo Grove, Illinois 60089
(847) 808-7766 FAX (847) 808-7772

Braun Intertec, Inc.	Client Project ID:	LWXX-97-0120	Sampled:	Jun 6, 1997
3315 N. 124th Street, Suite N	Matrix Descript:	Soil	Received:	Jun 9, 1997
Brookfield, WI 53005	Analysis Method:	WDNR DRO	Extracted:	Jun 11, 1997
Attention: Michelle Freimund	First Sample #:	706-1158	Analyzed:	Jun 11, 1997
			Reported:	Jun 17, 1997

DIESEL RANGE ORGANICS

Sample Number	Sample Description	Detection Limit mg/kg, Dry Weight (ppm)	High B.P. Hydrocarbons mg/kg, Dry Weight (ppm)	Chromatogram Description
706-1158	GP-1, 0-2	6.5	N.D.	—
706-1159	GP-2, 4-6	6.7	N.D.	—

High Boiling Point Hydrocarbons is performed as described in Leaking Underground Storage Tank Analytical Guidance, July 1993 WDNR SW 130 93 REV. Analytes reported as N.D. were not present above the stated limit of detection. Because matrix effects and/or other factors required additional sample dilution, detection limits for this sample have been raised.

GREAT LAKES ANALYTICAL

Kevin W. Keeley
Laboratory Director

Certifications: AALA-461.01; US Army Corps of Engineers; Delaware HSS-IL069; Illinois EPA-100261; New Jersey DEP-54001; New York DOH-11487; Pennsylvania DEP-68-500; Tennessee DOH-02804; Tennessee DEC; Virginia DGS-00164; Wisconsin DNR-999917160

GREAT LAKES ANALYTICAL
1380 Busch Parkway • Buffalo Grove, Illinois 60089
(847) 808-7766 FAX (847) 808-7772

Braun Intertec, Inc.	Client Project ID:	LWXX-97-0120	Sampled:	Jun 6, 1997
3315 N. 124th Street, Suite N	Sample Descript:	Soil: GP-1, 0-2	Received:	Jun 9, 1997
Brookfield, WI 53005	Analysis Method:	EPA 8080	Extracted:	Jun 11, 1997
Attention: Michelle Freimund	Lab Number:	706-1158	Analyzed:	Jun 16, 1997
			Reported:	Jun 17, 1997

POLYCHLORINATED BIPHENYLS (EPA 8080)

Analyte	Detection Limit µg/kg, Dry Weight	Sample Results µg/kg, Dry Weight
PCB 1016	65	N.D.
PCB 1221	65	N.D.
PCB 1232	65	N.D.
PCB 1242	65	N.D.
PCB 1248	65	N.D.
PCB 1254	65	N.D.
PCB 1260	65	N.D.

Analytes reported as N.D. were not present above the stated limit of detection. Because matrix effects and/or other factors required additional sample dilution, detection limits for this sample have been raised.

GREAT LAKES ANALYTICAL

Kevin W. Keeley
Laboratory Director

7061158.BRW <5>

GREAT LAKES ANALYTICAL
1380 Busch Parkway • Buffalo Grove, Illinois 60089
(847) 808-7766 FAX (847) 808-7772

Braun Intertec, Inc.	Client Project ID:	LWXX-97-0120	Sampled:	Jun 6, 1997
3315 N. 124th Street, Suite N	Sample Descript:	TCLP Extract: GP-1, 0-2	Received:	Jun 9, 1997
Brookfield, WI 53005	Analysis Method:	EPA 8260		
Attention: Michelle Freimund	Lab Number:	706-1158	Analyzed:	Jun 13, 1997
			Reported:	Jun 17, 1997

TCLP VOLATILES

Analyte	Detection Limit mg/L	Sample Results mg/L
Benzene	0.40	N.D.
Carbon tetrachloride	0.40	N.D.
Chlorobenzene	0.40	N.D.
Chloroform	0.40	N.D.
1,2-Dichloroethane	0.40	N.D.
1,1-Dichloroethylene	0.40	N.D.
Methyl ethyl ketone	100	N.D.
Tetrachloroethylene	0.40	N.D.
Trichloroethylene	0.40	N.D.
Vinyl chloride	0.16	N.D.

Analytes reported as N.D. were not present above the stated limit of detection.

GREAT LAKES ANALYTICAL

Kevin W. Keeley
Laboratory Director

7061158.BRW <6>

Certifications: AALA-461.01; US Army Corps of Engineers; Delaware HSS-IL069; Illinois EPA-100261; New Jersey DEP-54001; New York DOH-11487; Pennsylvania DEP-68-500; Tennessee DOH-02804; Tennessee DEC; Virginia DGS-00164; Wisconsin DNR-999917160

GREAT LAKES ANALYTICAL
1380 Busch Parkway • Buffalo Grove, Illinois 60089
(847) 808-7766 FAX (847) 808-7772

Braun Intertec, Inc.	Client Project ID:	LWXX-97-0120	Sampled:	Jun 6, 1997
3315 N. 124th Street, Suite N	Sample Descript:	TCLP Extract: GP-1, 0-2	Received:	Jun 9, 1997
Brookfield, WI 53005	Analysis Method:	EPA 8270	Extracted:	Jun 12, 1997
Attention: Michelle Freimund	Lab Number:	706-1158	Analyzed:	Jun 17, 1997
			Reported:	Jun 18, 1997

TCLP SEMI-VOLATILES

Analyte	Detection Limit mg/L	Sample Results mg/L
o-Cresol	20	N.D.
m-, p-Cresol	20	N.D.
Cresol	20	N.D.
1,4-Dichlorobenzene	0.75	N.D.
2,4-Dinitrotoluene	0.013	N.D.
Hexachlorobenzene	0.013	N.D.
Hexachloro-1,3-butadiene	0.050	N.D.
Hexachloroethane	0.30	N.D.
Nitrobenzene	0.20	N.D.
Pentachlorophenol	10	N.D.
Pyridine	0.50	N.D.
2,4,5-Trichlorophenol	40	N.D.
2,4,6-Trichlorophenol	0.20	N.D.

Analytes reported as N.D. were not present above the stated limit of detection.

GREAT LAKES ANALYTICAL

Kevin W. Keeley
Laboratory Director

7061158.BRW <7>

Certifications: AALA-461.01; US Army Corps of Engineers; Delaware HSS-IL069; Illinois EPA-100261; New Jersey DEP-54001; New York DOH-11487; Pennsylvania DEP-68-500; Tennessee DOH-02804; Tennessee DEC; Virginia DGS-00164; Wisconsin DNR-999917160

GREAT LAKES ANALYTICAL
1380 Busch Parkway • Buffalo Grove, Illinois 60089
(847) 808-7766 FAX (847) 808-7772

Braun Intertec, Inc.	Client Project ID:	LWXX-97-0120	Sampled:	Jun 6, 1997
3315 N. 124th Street, Suite N	Sample Descript:	Soil: GP-1, 0-2	Received:	Jun 9, 1997
Brookfield, WI 53005	Analysis Method:	EPA 8310	Extracted:	Jun 12, 1997
Attention: Michelle Freimund	Lab Number:	706-1158	Analyzed:	Jun 12, 1997
			Reported:	Jun 17, 1997

POLYNUCLEAR AROMATIC HYDROCARBONS (EPA 8310)

Analyte	Detection Limit µg/kg, Dry Weight	Sample Results µg/kg, Dry Weight
Acenaphthene	260	N.D.
Acenaphthylene	520	N.D.
Anthracene	1.3	N.D.
Benzo (a) anthracene	1.3	120
Benzo (a) pyrene	0.60	230
Benzo (b) fluoranthene	2.6	N.D.
Benzo (ghi) perylene	5.2	50
Benzo (k) fluoranthene	1.3	N.D.
Chrysene	5.2	310
Dibenzo (a,h) anthracene	2.6	N.D.
Fluoranthene	130	N.D.
Fluorene	130	N.D.
Indeno (1,2,3-cd) pyrene	52	900
1-methyl Naphthalene	130	N.D.
2-methyl Naphthalene	130	N.D.
Naphthalene	13	N.D.
Phenanthrene	13	N.D.
Pyrene	52	N.D.

Analytes reported as N.D. were not present above the stated limit of detection. Because matrix effects and/or other factors required additional sample dilution, detection limits for this sample have been raised.

GREAT LAKES ANALYTICAL

Kevin W. Keeley
Laboratory Director

7061158.BRW <8>

GREAT LAKES ANALYTICAL
1380 Busch Parkway • Buffalo Grove, Illinois 60089
(847) 808-7766 FAX (847) 808-7772

Braun Intertec, Inc.	Client Project ID:	LWXX-97-0120	Sampled:	Jun 6, 1997
3315 N. 124th Street, Suite N	Sample Descript:	Soil: GP-2, 4-6	Received:	Jun 9, 1997
Brookfield, WI 53005	Analysis Method:	EPA 8310	Extracted:	Jun 12, 1997
Attention: Michelle Freimund	Lab Number:	706-1159	Analyzed:	Jun 12, 1997
			Reported:	Jun 17, 1997

POLYNUCLEAR AROMATIC HYDROCARBONS (EPA 8310)

Analyte	Detection Limit µg/kg, Dry Weight	Sample Results µg/kg, Dry Weight
Acenaphthene	130	N.D.
Acenaphthylene	260	N.D.
Anthracene	0.65	N.D.
Benzo (a) anthracene	0.65	N.D.
Benzo (a) pyrene	0.30	N.D.
Benzo (b) fluoranthene	1.3	N.D.
Benzo (ghi) perylene	2.6	N.D.
Benzo (k) fluoranthene	0.65	N.D.
Chrysene	2.6	N.D.
Dibenzo (a,h) anthracene	1.3	N.D.
Fluoranthene	65	N.D.
Fluorene	6.5	N.D.
Indeno (1,2,3-cd) pyrene	26	N.D.
1-methyl Naphthalene	65	N.D.
2-methyl Naphthalene	65	N.D.
Naphthalene	6.5	N.D.
Phenanthrene	6.5	N.D.
Pyrene	26	N.D.

Analytes reported as N.D. were not present above the stated limit of detection. Because matrix effects and/or other factors required additional sample dilution, detection limits for this sample have been raised.

GREAT LAKES ANALYTICAL

Kevin W. Keeley
Laboratory Director

Certifications: AALA-461.01; US Army Corps of Engineers; Delaware HSS-IL069; Illinois EPA-100261; New Jersey DEP-54001; New York DOH-11487; Pennsylvania DEP-68-500; Tennessee DOH-02804; Tennessee DEC; Virginia DGS-00164; Wisconsin DNR-999917160

GREAT LAKES ANALYTICAL

CHAIN OF CUSTODY REPORT

1380 BUSCH PARKWAY
BUFFALO GROVE, ILLINOIS 60089-4505
(847) 808-7766 FAX (847) 808-7772

Client: Braun Intertec Corporation
Address: 3315 N. 124th St, Unit N
Brookfield, WI
Report to: M. Freimund
Phone #: (414) 783-8500
Fax #: (414) 783-8510

Bill To: Same
Address:
State & Program: WI
Phone #: ( )
Fax #: ( )

TAT: (5 DAY) 4 DAY 3 DAY 2 DAY 1 DAY < 24 HRS.
DATE RESULTS NEEDED: 6/16/97 ASAP as soon as analyzed
TEMPERATURE UPON RECEIPT: on ICE
AIR BILL NO. GCA 914

Project: LWXX-97-0120
Sampler: Michelle Freimund
PO/(Quote)#: G-102

	FIELD ID, LOCATION	DATE COLLECTED	TIME COLLECTED	SAMPLE MATRIX	PRESERVATIVES	NO. CONTAINERS	TYPE CONTAINERS	DRO	PAH (8310)	TCLP Lead/Silver	Chlorine	PCB/8080	SAMPLE CONTROL: CRACKED/BROKEN	SAMPLE CONTROL: IMPROPERLY SEALED	SAMPLE CONTROL: GOOD CONDITION	LABORATORY ID NUMBER
1	GP-1, 0-2'	6/4/97	8:45am	Soil	none	3		X	X	X	X	X			✓	7061158
2	GP-2, 4-6'	↓	9:00am	↓	↓	3		X	X						✓	7061159
3																
4																
5																
6																
7																
8																
9																
10																

RELINQUISHED	DATE/TIME	RECEIVED	DATE/TIME	RELINQUISHED	DATE/TIME	RECEIVED	DATE/TIME
Michelle Freimund	6/4/97	[signature]		[signature]	6/9/97 3:30	K. Knoll	6/9/97
RELINQUISHED	DATE/TIME	RECEIVED	DATE/TIME	RELINQUISHED	DATE/TIME	RECEIVED	DATE/TIME

COMMENTS:

State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Tommy G. Thompson, Governor
George E. Meyer, Secretary
Gloria L. McCutcheon, Regional Director

Southeast Region Annex
4041 N. Richards Street, Box 12436
Milwaukee, WI 53212-0436
TELEPHONE 414-229-0800
FAX 414-229-0810

July 9, 1997

BRRTS# : 02-65-152260
Facility ID#: 265007820
BRR/ERP

DIANE LEE
ELKHORN WEBPRESS
11595 MCCONNELL RD
WOODSTOCK IL 60098

SUBJECT: Reported Contamination at 550 S. Centuria, Elkhorn WI

To speed processing, correspondence should reference BRRTS & FID numbers at top of letter.

Dear Ms. Lee:

On 6-3-97 Kathryn Hay of Braun Intertec informed the Department that lubricating oil had caused soil contamination at the subject address.

Based on the information submitted to the Wisconsin Department of Natural Resources (WDNR), we believe you are responsible for restoring the environment at the referenced site under Section 292, Wisconsin Stats., known as the hazardous substances spills law. Utilizing information submitted to the Department, this case has been assigned an unknown ranking due to the lack of information concerning soil and groundwater contamination.

WDNR Southeast Region Prioritization and Scoring Policy

Due to the WDNR workload, it is necessary to rank all contamination cases for review priority. Lower priority cases do not have assigned project managers, however, responsible parties are required to proceed with investigation and clean-up efforts. Until a priority has been assigned to this site, you should proceed with the required response work, submitting all plans and reports, along with status reports, to this office. The WDNR will notify you if your site will receive active oversight.

Your responsibilities include investigating the extent of the contamination and then selecting and implementing the most appropriate remedial action. Enclosed is information to help you understand what you need to do to ensure your compliance with the spills law.

The purpose of this letter is threefold: 1) to describe your legal responsibilities, 2) to explain what you need to do to investigate and clean up the contamination, and 3) to provide you with information about cleanups, environmental consultants, possible financial assistance, and working cooperatively with the Department of Natural Resources.

Legal Responsibilities:
Your legal responsibilities are defined both in statute and in administrative codes. The hazardous substances spill law, Section 292.11 (3) Wisconsin Statutes, states:

* RESPONSIBILITY. A person who possesses or controls a hazardous substance which is discharged or who causes the discharge of a hazardous substance shall take the actions necessary to restore the environment to the extent practicable and minimize the harmful effects from the discharge to the air, lands, or waters of the state.

Wisconsin Administrative Codes chapters NR 700 through NR 728 establish requirements for emergency and interim actions, public information, site investigations, design and operation of remedial action systems, and case closure. Chapter NR 708 includes provisions for immediate actions in response to limited contamination. Wisconsin Administrative Code chapter NR 140 establishes groundwater standards for contaminants that reach groundwater.

Steps to Take:
The longer contamination is left in the environment the farther it can spread and the more it may cost to clean up. Quick action may lessen damage to your property and neighboring properties and reduce your costs in investigating and cleaning up the contamination. To ensure that your cleanup complies with Wisconsin's laws and administrative codes, you should hire a professional environmental consultant who understands what needs to be done. These are the first four steps to take:

1. By 8-21-97, please submit written verification (such as a letter from the consultant) that you have hired an environmental consultant. You will need to work quickly to meet this timeline.

2. By 10-3-97, your consultant must submit a workplan and schedule for the investigation. The consultant must follow the DNR administrative codes and technical guidance documents. Please include with your workplan a copy of any previous information that has been completed (such as an underground tank removal report or a preliminary excavation report).

3. Please inform DNR of what is being done at your site. Submittal requirement timelines depend on the contaminants at the site. As described in Chap. NR 700.11, if the site meets criteria for a "simple site", progress reports must be submitted semi-annually, beginning 6 months from the initial notification date. If the site meets criteria for a "complex site", the site investigation report and a draft remedial options report must be submitted to DNR within 30 days of completion of both reports. Your consultant must clearly document the extent and degree of soil and groundwater contamination and submit a proposal for cleaning it up.

4. For complex sites, per chapter NR 724.13(3), you or your consultant must provide a brief report at least every 90 days, starting after the remediation system begins operation. The reports should summarize the work completed since the last report. Quarterly reports need only include one or two pages of text, plus any relevant maps and tables. However, should conditions at your site warrant, we may require more frequent contacts with the Department.

Due to the number of contaminated sites and our staffing levels in DNR's Southeast Region, we will be unable to provide workplan approvals for investigations or remedial actions. To maintain your compliance with the spills law and chs. NR 700 through NR 728, do not delay the investigation and cleanup of your site by waiting for DNR response. We have provided detailed technical guidance to environmental consultants. Your consultant is expected to know our technical procedures and administrative codes and should be able to answer your questions on meeting cleanup requirements.

Your correspondence and reports regarding this site should be sent to:

Michael Farley, BRR Program Assistant

Wisconsin Department of Natural Resources
Box 12436
4041 N Richards St
Milwaukee WI 53212

Unless otherwise requested, please send only one copy of plans and reports. To speed processing, correspondence should reference the BRRTS and FID numbers shown at the top of this letter.

Information for Site Owners:
Enclosed is a list of environmental consultants and some tips on selecting one. If you are eligible for reimbursement of costs under Wisconsin's PECFA program (see last paragraph) you will need to compare at least three consultants' proposals before hiring a consultant. Consultants and laboratories working in the PECFA program are required to carry errors and omissions insurance to help protect you against unsuitable work. Also enclosed are materials on controlling costs, understanding the cleanup process, and choosing a site cleanup method. Please read this information carefully.

If you are interested in obtaining the protection of limited liability under s. 292, Stats., please contact Mark Giesfeldt at (608) 267-7562 or Darsi Foss at (608) 267-6713, in DNR's Madison office for more information. The liability exemption under s. 292 Stats., is available to persons who meet the definition of "purchaser" in s. 292 and receive DNR approval for the response actions taken at the property undergoing cleanup. DNR will determine eligibility for this program on a case-by-case basis, prior to the "purchaser" developing a scope of work for conducting a ch. NR 716 site investigation.

Financial Information:
Reimbursement from the Petroleum Environmental Cleanup Fund (PECFA) is available for the costs of cleaning up contamination from eligible petroleum storage tanks. The fund is administered by the Department of Industry, Labor, and Human Relations (DILHR). Please contact DILHR at (608) 266-2424 for more information on eligibility and regulations for this program.

Thank you for your cooperation.

Sincerely,

Michael G. Farley
Program Assistant
414-229-0808

cc: Kathryn Hay, Braun Intertec

DNR/LE/GEF II ID:6082663696 JUN 03'97 15:06 No.027 P.01

ERP

WALWORTH Co. SP111 265007820

PLEASE PRINT

State of Wisconsin Substance Release Notification Form

24-Hour Emergency Hotline Number: 1-800-943-0003 Form 4400-91 Rev. 11-95

Date and Mil. Time of Incident	Date and Mil. Time Reported
~ 1996 ~	6/3/97 16:15

Person Reporting Kathryn Hay	**Telephone #** (414) 783-0880
Representing Agency, Firm, or Citizen Braun Intertech	
Responsible Party Graphek Press	
Contact Name Diane Lee	**Telephone #** (815) 338-6750
Address 11595 McConnell Rd	**City, State, Zip Code** Woodstock IL

Substance Involved	Amount & Units Released	Amt. Recovered	Is this a 304 (a)(1)(b)(4) (42 USC) spill? ☐ Yes ☐ No ☐ Unknown
lube oil			

☐ Solid ☐ Semisolid ☒ Liquid ☐ Gas Color _____ Odor _____

Exact Location (inc. address, facility name, mileage, bldg. #, etc.)
Elkhorn WebPress - 550 S Centuria

City	County	Lat/long
Elkhorn	Walworth	

DNR Region	¼	¼	Sec.	T	N/S	R	E/W	Watershed/Basin
SER								

Cause of Incident one area is 12'x 12' another is 12 yds x 12 yds > Bothe from leaking Compressor

Spilled Substance Impact To:
Check (✓) all that apply
- ☐ Air ☐ Potential
- ☒ Soil ☐ Potential
- ☐ Groundwater ☐ Potential
- ☐ Surface Water ☐ Potential
  Name: _____
- ☐ Storm Sewer ☐ Potential
- ☐ Sanitary Sewer ☐ Potential
- ☐ Concrete/Asphalt ☐ Potential
- ☐ Private Well ☐ Potential
- ☐ Contained/Recovered
- ☐ Other: _____

Spill Source:
- ☐ Transportation Accident, Fuel Supply Tank Spill
- ☐ Transportation Accident, Load Spill
- ☐ Industrial Facility ☐ Paper Mill ☐ Chemical Co.
- ☐ Ag Coop/Facility/Food Factory/Facility
- ☐ Gas/Service Station/Garage/Auto Dealer, Repair Shop
- ☐ Pipeline, Terminal, Tank Farm, Oil Jobber/Wholesaler
- ☐ Public Property (city, state, church, school, etc.)
- ☐ Utility Co., Power Generating/Transfer Facility
- ☐ Private Property (home/farm)
- ☐ Construction, Excavation, Wrecking, Quarry, Mine
- ☐ Airport Facility ☐ Railroad Facility
- ☒ Other Compressor

Action Taken By Spiller
- ☐ No Action Taken
- ☐ No Action Needed
- ☐ Monitor
- ☐ Cleanup Method: _____
- ☐ Waste Destination: _____
- ☐ Containment
- ☐ Contractor Hired
  Name: _____
- ☐ Other: _____

Injuries? ☐ Yes ☒ No If yes, how many? ____ **Has an evacuation occurred?** ☐ Yes ☒ No **Potential?** ☐ Yes ☒ No

Are there any resource damages? ☐ Yes ☒ No ☐ Potential What kinds? _____

Other Agencies Notified (✓ first column if notified); Check (✓) both columns if on scene

☐☐ Fire Department/Hazmat	☒☐ Local DNR	☐☐ EPA
☐☐ Local Law Enforcement	☐☐ Div. Emer. Gov.	☐☐ Nat'l Resp. Ctr. 800-442-8802
☐☐ LEPC or Local Emer. Gov.	☐☐ DATCP 608-224-4500	☐☐ Chemtrec 800-424-9300
☐☐ Regional Response Team	☐☐ DHSS 608-266-2830	☐☐ Other _____

Incident Commander, if known: _____ Phone: _____

Prepared By: (Print) Shelley Magsamen (Sign) Shelley	**Date:** 6/3	**Rpt'd to DATCP?** ☐Yes ☒No
Person Notified: Mike Thompson	**Region Notified:** SER **Time:** Lunch **Date:** 6-3-97	
Invstgtd By: (Print) (Sign)	**Date:**	**Site Closed?** ☐Yes ☐No
Spill Coordinator Signoff:	**Date:** **Transferred to ERP?** ☐No ☒Yes; Case # SP111 265007820	**NFA Letter Sent?** ☐Yes ☐No; **Spill Packet Sent?** ☐Yes ☐No

☐ Additional Comments on Reverse

State of Wisconsin Substance Release Report (Con't)
Form 4400-91 Rev. 11-95

Date and Military Time of Incident — 1996	Responsible Party Braun Intertech

Additional Comments:

West side = 87 ppm - DOC

East side = DOC 330 ppm Geoprobe to be brought in