State of Wisconsin DEPARTMENT OF NATURAL RESOURCES 2300 N. Dr. Martin Luther King, Jr. Drive Milwaukee WI 53212-3128

Scott Walker, Governor Kurt A. Thiede, Interim Secretary Telephone 608-266-2621 Toll Free 1-888-936-7463 TTY Access via relay - 711



September 6, 2017

Mr. Patrick Murphy City Wide Insulation Company, Inc. 2159 S. 116th St. West Allis, WI 53227

KEEP THIS DOCUMENT WITH YOUR PROPERTY RECORDS

SUBJECT:Final Case Closure with Continuing Obligations
City Wide Insulation, 2159 S. 116th St., West Allis, WI
BRRTS #: 03-41-182126, FID #: 241898910, PECFA #: 53227-1093-59

Dear Mr. Murphy:

The Wisconsin Department of Natural Resources (DNR) considers the City Wide Insulation site closed, with continuing obligations. No further investigation or remediation is required at this time. However, you, future property owners, and occupants of the property must comply with the continuing obligations as explained in the conditions of closure in this letter. Please read over this letter closely to ensure that you comply with all conditions and other on-going requirements. Provide this letter and any attachments listed at the end of this letter to anyone who purchases, rents, or leases this property from you.

This final closure decision is based on the correspondence and data provided, and is issued under Wis. Admin. §§ NR 726 and 727. The DNR reviewed the request for closure on January 26, 2017, for compliance with state laws and standards to maintain consistency in the closure of these cases. Additional investigative activities were required in a letter dated February 7, 2017. A revised closure request was received by the DNR on August 16, 2017, documenting the additional investigation. A request for remaining actions needed was issued by the DNR on August 23, 2017, and documentation that the conditions in that letter were met was received on September 5, 2017.

This former vehicle refueling station has soil and groundwater contaminated with petroleum volatile organic compounds due to a release from the former underground storage tanks (USTs) located on the property. The pavement in the area of the release is to be maintained in order to minimize the infiltration of water and prevent additional groundwater contamination that would violate the groundwater quality standards in Wis. Admin. § NR 140 and to prevent direct contact with residual soil contamination that might otherwise pose a threat to human health. The conditions of closure and continuing obligations required were based on the property being used for commercial purposes.

Continuing Obligations

The continuing obligations for this site are summarized below. Further details on actions required are found in the section <u>Closure Conditions</u>.

- Groundwater contamination is present at or above Wis. Admin. § NR 140 enforcement standards.
- Residual soil contamination exists that must be properly managed should it be excavated or removed.
- Pavement must be maintained over contaminated soil and the DNR must be notified and approve any changes to this barrier.



The DNR fact sheet "Continuing Obligations for Environmental Protection," RR-819, helps to explain a property owner's responsibility for continuing obligations on their property. The fact sheet may be obtained at http://dnr.wi.gov/files/PDF/pubs/rr/RR819.pdf.

GIS Registry

This site will be included on the Bureau for Remediation and Redevelopment Tracking System (BRRTS on the Web) at <u>http://dnr.wi.gov/topic/Brownfields/wrrd.html</u>, to provide public notice of residual contamination and of any continuing obligations. The site can also be viewed on the Remediation and Redevelopment Sites Map (RRSM), a map view, under the Geographic Information System (GIS) Registry layer, at the same web address.

DNR approval prior to well construction or reconstruction is required for all sites shown on the GIS Registry, in accordance with Wis. Admin. § NR 812.09 (4)(w). This requirement applies to private drinking water wells and high capacity wells. To obtain approval, complete and submit Form 3300-254 to the DNR Drinking and Groundwater program's regional water supply specialist. This form can be obtained on-line at http://dnr.wi.gov/topic/wells/documents/3300254.pdf.

All site information is also on file at the southeast Regional DNR office, at 2300 N. Dr. Martin Luther King, Jr. Drive, Milwaukee, WI 53212. This letter and information that was submitted with your closure request application, including any maintenance plan and maps, can be found as a Portable Document Format (PDF) in BRRTS on the Web.

Prohibited Activities

Certain activities are prohibited at closed sites because maintenance of a barrier is intended to prevent contact with any remaining contamination. When a barrier is required, the condition of closure requires notification of the DNR before making a change, in order to determine if further action is needed to maintain the protectiveness of the remedy employed. The following activities are prohibited on any portion of the property where pavement is required, as shown on the attached map "Impermeable Barrier Cap for Industrial/Non-Industrial Direct Contact and Groundwater Pathway RCL Exceedances," Figure D.2., March 29, 2017, <u>unless prior written approval has been obtained from the DNR</u>:

- removal of the existing barrier or cover;
- replacement with another barrier or cover;
- excavating or grading of the land surface;
- filling on covered or paved areas;
- plowing for agricultural cultivation;
- construction or placement of a building or other structure;

• changing the use or occupancy of the property to a residential exposure setting, which may include certain uses, such as single or multiple family residences, a school, day care, senior center, hospital, or similar residential exposure settings.

Closure Conditions

Compliance with the requirements of this letter is a responsibility to which you and any subsequent property owners must adhere. DNR staff will conduct periodic prearranged inspections to ensure that the conditions included in this letter and the attached maintenance plan are met. If these requirements are not followed, the DNR may take enforcement action under Wis. Stats. § 292.11 to ensure compliance with the specified requirements, limitations or other conditions related to the property.

Please send written notifications in accordance with the following requirements to:

Department of Natural Resources

Attn: Remediation and Redevelopment Program Environmental Program Associate 2300 N. Dr. Martin Luther King Jr., Drive, Milwaukee, WI 53212

City Wide Insulation (BRRTS #: 03-41-182126) September 6, 2017

Residual Groundwater Contamination (Wis. Admin. §§ NR 140, 812)

Groundwater contamination greater than enforcement standards is present on this contaminated property, as shown on the attached map "Groundwater Isoconcentration," Figure B.3.b., March 29, 2017. If you intend to construct a new well, or reconstruct an existing well, you'll need prior DNR approval.

Residual Soil Contamination (Wis. Admin. §§ NR 718, 500 to 536 or Wis. Stats. § 289)

Soil contamination remains in the area of the former USTs, as indicated on the attached map "Soil Contamination," Figure B.2.a., March 29, 2017. If soil in the specific locations described above is excavated in the future, the property owner or right-of-way holder at the time of excavation must sample and analyze the excavated soil to determine if contamination remains. If sampling confirms that contamination is present, the property owner or right-of-way holder at the time of excavation will need to determine whether the material is considered solid or hazardous waste and ensure that any storage, treatment or disposal is in compliance with applicable standards and rules. Contaminated soil may be managed in accordance with Wis. Admin. § NR 718 with prior DNR approval.

In addition, all current and future owners and occupants of the property and right-of-way holders need to be aware that excavation of the contaminated soil may pose an inhalation or other direct contact hazard and as a result special precautions may need to be taken to prevent a direct contact health threat to humans.

Depending on site-specific conditions, construction over contaminated soils or groundwater may result in vapor migration of contaminants into enclosed structures or migration along newly placed underground utility lines. The potential for vapor inhalation and means of mitigation should be evaluated when planning any future redevelopment, and measures should be taken to ensure the continued protection of public health, safety, welfare and the environment at the site.

<u>Cover or Barrier</u> (Wis. Stats. § 292.12 (2) (a), Wis. Admin. §§ NR 726.15, NR 727.07) The pavement that exists in the location shown on the attached map "Impermeable Barrier Cap for Industrial/Non-Industrial Direct Contact and Groundwater Pathway RCL Exceedances," Figure D.2., March 29, 2017, shall be maintained in compliance with the **attached maintenance plan** in order to minimize the infiltration of water and prevent additional groundwater contamination that would violate the groundwater quality standards in Wis. Admin. § NR 140 and to prevent direct contact with residual soil contamination that might otherwise pose a threat to human health.

The cover approved for this closure was designed to be protective for a commercial or industrial use setting. Before using the property for residential purposes, you must notify the DNR at least 45 days before taking an action, to determine if additional response actions are warranted.

A request may be made to modify or replace a cover or barrier. Before removing or replacing the cover, you must notify the DNR at least 45 days before taking an action. The replacement or modified cover or barrier must be protective of the revised use of the property, and must be approved in writing by the DNR prior to implementation. A cover or barrier for industrial land uses, or certain types of commercial land uses may not be protective if the use of the property were to change such that a residential exposure would apply. This may include, but is not limited to single or multiple family residences, a school, day care, senior center, hospital or similar settings. In addition, a cover or barrier for multi-family residential housing use may not be appropriate for use at a single family residence.

The attached maintenance plan and inspection log (DNR form 4400-305) are to be kept up-to-date and on-site. Inspections shall be conducted annually in accordance with the attached maintenance plan. Submit the inspection log to the DNR only upon request.

PECFA Reimbursement

Wis. Stats. § 101.143 requires that Petroleum Environmental Cleanup Fund Award (PECFA) claimants seeking reimbursement of interest costs, for sites with petroleum contamination, submit a final reimbursement claim within 120 days after they receive a closure letter on their site. For claims not received within 120 days of the date of this letter, interest costs after 60 days of the date of this letter will not be eligible for PECFA reimbursement. If there is equipment purchased with PECFA funds remaining at the site, contact the DNR Project Manager to determine the method for salvaging the equipment.

Per Wisconsin Act 55 (2015 State budget), a claim for PECFA reimbursement must be submitted within 180 days of incurring costs (i.e., completing a task). If your final PECFA claim is not submitted within 180 days of incurring the costs, the costs will not be eligible for PECFA reimbursement.

In Closing

Please be aware that the case may be reopened pursuant to Wis. Admin. § NR 727.13 for any of the following situations:

- if additional information regarding site conditions indicates that contamination on or from the site poses a threat to public health, safety, or welfare or to the environment,
- if the property owner does not comply with the conditions of closure, with any deed restrictions applied to the property, or with a certificate of completion issued under Wis. Stats.§ 292.15, or
- a property owner fails to maintain or comply with a continuing obligation (imposed under this closure approval letter).

The DNR appreciates your efforts to restore the environment at this site. If you have any questions regarding this closure decision or anything outlined in this letter, please contact the DNR Project Manager, Riley Neumann, at (414) 263-8699, or at riley.neumann@wisconsin.gov.

Sincerely,

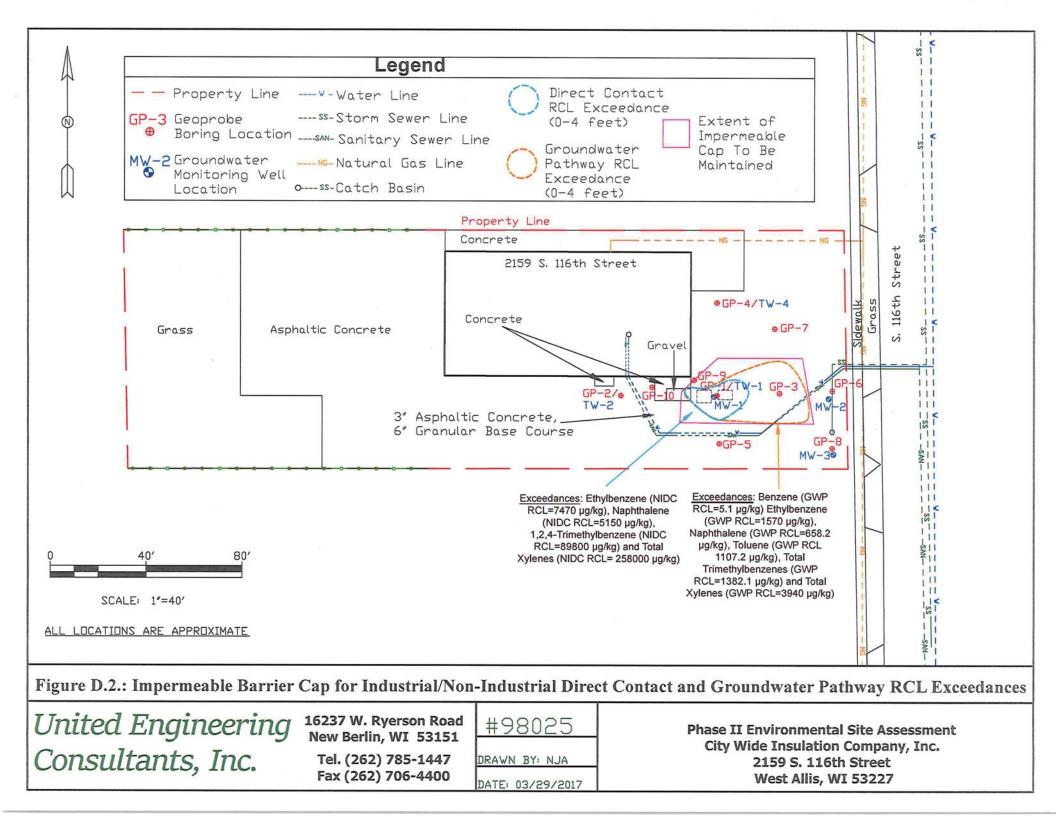
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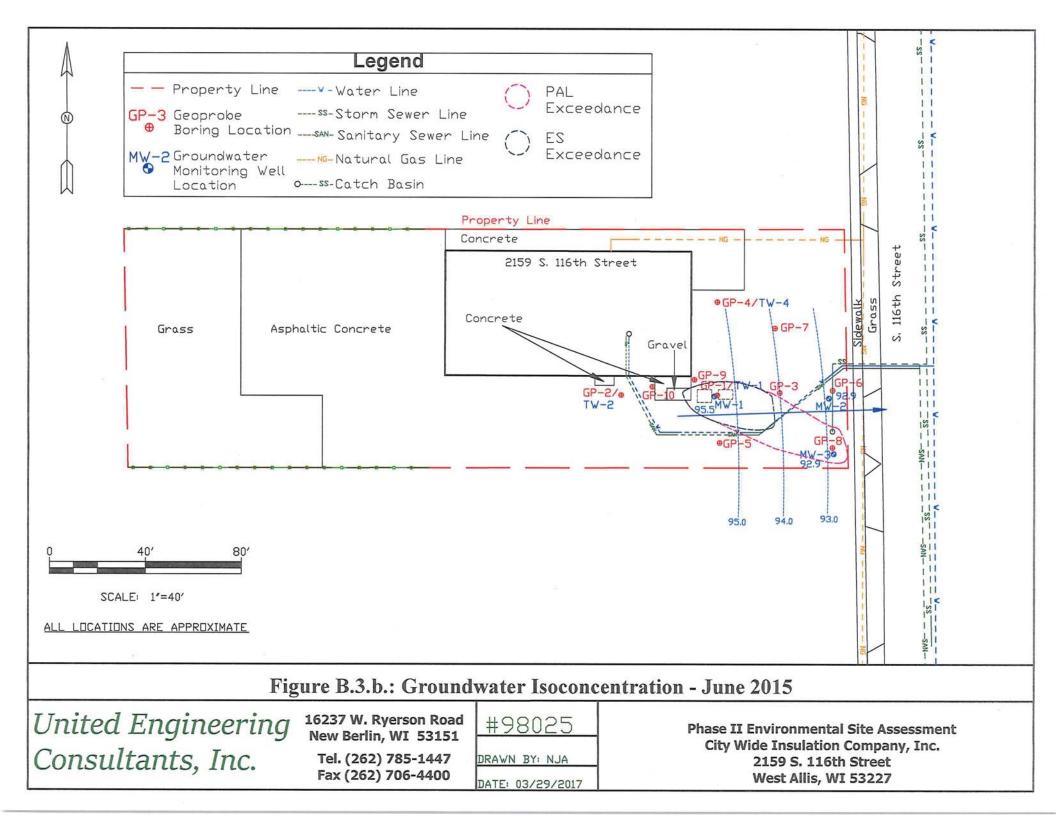
Michele R. Norman Southeast Region Team Supervisor Remediation & Redevelopment Program

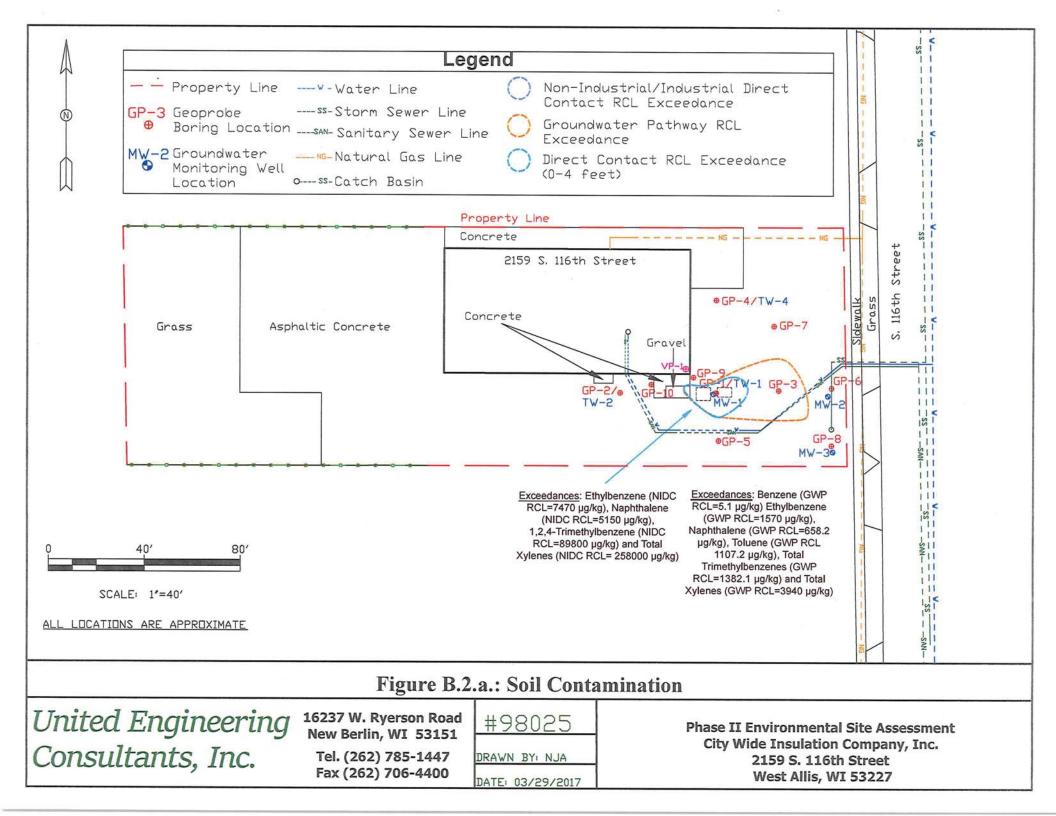
Attachments:

- Impermeable Barrier Cap for Industrial/Non-Industrial Direct Contact and Groundwater Pathway RCL Exceedances, Figure D.2., March 29, 2017
- Groundwater Isoconcentration, Figure B.3.b., March 29, 2017
- Soil Contamination, Figure B.2.a., March 29, 2017
- Cover or Barrier Maintenance Plan, Attachment D.1., August 7, 2017
- Continuing Obligations Inspection and Maintenance Log, Attachment D.4., February 2014

cc: Tim Anderson, United Engineering Consultants, Inc. (electronic)







D.1. COVER or BARRIER MAINTENANCE PLAN

August 7, 2017

City Wide Insulation Company Inc. 2159 S. 116th Street West Allis, Wisconsin 53227 BRRTS# 03-41-182126 Parcel ID No. 482-9999-007

Introduction

This document is the Maintenance Plan for an impermeable cap at the above-referenced property in accordance with the requirements of s. NR 724.13 (2), Wis. Adm. Code. The maintenance activities relate to the existing asphaltic concrete, concrete and gravel which occupies the area over the contaminated soil plume.

More site-specific information about this property may be found in:

- The case file in the DNR Southeast Region office located at 2300 N. Dr. Martin Luther King Jr. Drive Milwaukee, Wisconsin 53212
- <u>BRRTS on the Web</u> for the link to a PDF for site-specific information at the time of closure and on continuing obligations;
- RR Sites Map/GIS Registry layer for a map view of the site
- Mr. Riley Neumann, the DNR project manager.

Description of Contamination

Ethylbenzene, Naphthalene, 1,2,4-Trimethylbenzene and total Xylenes are present in the soil at concentrations which exceed their Industrial and Non-Industrial Direct Contact RCLs at approximate depths ranging from three (3) to three and one-half (3 ½) feet in the area of the former USTs. Ethylbenzene, Naphthalene, total Trimethylbenzenes and Xylenes are present in the soil at approximate depths ranging from three (3) to four (4) feet at concentrations which exceed their Groundwater Pathway RCLs in the area of the former USTs and extending to the east approximately thirty (30) feet. Toluene is also present in exceedance of its Groundwater Pathway RCL at the above referenced depths in the area of the former USTs. In addition, Benzene is present in exceedance of its Groundwater Pathway RCL at the above referenced depths approximately thirty (30) feet east of the former USTs. The lateral extent of the soil contamination is indicated on attached figure D.2. Impermeable Barrier Cap for Industrial/Non-Industrial Direct Contact and Groundwater Pathway RCL Exceedances.

Description of the Impermeable Cap to be Maintained

The impermeable cap consists of several inches of compacted gravel or approximately three (3) inches of asphaltic concrete or four (4) inches of concrete underlain by about six (6) inches of granular base course. The impermeable cap is located above the entire lateral extent of the PVOC contaminated soil which exceeds the Groundwater Pathway RCLs and the Industrial and Non-Industrial Direct Contact RCLs within four (4) feet of the ground surface.

Impermeable Cap Purpose

The impermeable cap over the PVOC contaminated soil will serve as a barrier to prevent direct human contact with residual soil contamination which might otherwise pose a threat to human health. The cover/barrier also acts as a partial infiltration barrier to minimize future soil-togroundwater contamination migration which would violate the groundwater standards in ch. NR 140, Wisconsin Administrative Code. Based on the current commercial zoning and use of the property, the barrier should function as intended unless disturbed.

Annual Inspection

The impermeable cap overlying the PVOC contaminated soil as depicted in Figure D.2 will be inspected once a year, normally in the spring after all snow and ice has melted, for deterioration, cracks and other potential problems which can cause additional infiltration into or exposure to underlying soils. The inspections will be performed by the property owner or their designated representative. The inspections will be performed to evaluate damage due to settling, exposure to the weather, wear from traffic, increasing age and other factors. Any area where soils have become or are likely to become exposed and where infiltration from the surface will not be effectively minimized will be documented.

A log of the inspections and any repairs will be maintained by the property owner and is included as D.4, Form 4400-305, Continuing Obligations Inspection and Maintenance Log. The log will include recommendations for necessary repair of any areas where underlying soils are exposed and where infiltration from the surface will not be effectively minimized. Once repairs are completed, they will be documented in the inspection log. A copy of the maintenance plan and inspection log will be kept at the site and will be available for submittal or inspection by Wisconsin Department of Natural Resources (DNR) representatives upon their request.

Maintenance Activities

If problems are noted during the annual inspections or at any other time during the year, repairs will be scheduled as soon as practical. Repairs can include patching and filling or larger resurfacing or construction operations. In the event that necessary maintenance activities expose the underlying soil, the owner must inform maintenance workers of the direct contact exposure hazard and provide them with appropriate personal protection equipment (PPE). The owner must also sample any soil that is excavated from the site prior to disposal to ascertain if contamination remains. The soil must be treated, stored and disposed of by the owner in accordance with applicable local, state and federal law.

In the event the asphaltic concrete, concrete or gravel overlying the PVOC contaminated soil is removed or replaced, the replacement barrier must be equally impervious. Any replacement barrier will be subject to the same maintenance and inspection guidelines as outlined in this Maintenance Plan unless indicated otherwise by the DNR or its successor.

The property owner, in order to maintain the integrity of the impermeable cap, will maintain a copy of this Maintenance Plan at the site and will make it available to all interested parties (i.e. on-site employees, contractors, future property owners, etc.) for viewing.

Prohibition of Activities and Notification of DNR Prior to Actions Affecting a Cover/Barrier

The following activities are prohibited on any portion of the property where concrete or engineered soil cap is required as shown on the attached map, unless prior written approval has been obtained from the Wisconsin Department of Natural Resources: 1) removal of the existing barrier; 2) replacement with another barrier; 3) excavating or grading of the land surface; 4) filling on capped or paved areas; 5) plowing for agricultural cultivation; 6) construction or placement of a building or other structure; 7) changing the use or occupancy of the property to a residential exposure setting, which may include certain uses, such as single or multiple family residences, a school, day care, senior center, hospital, or similar residential exposure settings.

If removal, replacement or other changes to a cover, or a building which is acting as a cover, are considered, the property owner will contact DNR at least 45 days before taking such an action, to determine whether further action may be necessary to protect human health, safety, or welfare or the environment, in accordance with s. NR 727.07, Wis. Adm. Code.

Amendment or Withdrawal of Maintenance Plan

This Maintenance Plan can be amended or withdrawn by the property owner and its successors with the written approval of DNR.

August 2017

Site Owner and Operator: Mr. Patrick Murphy

Mr. Patrick Murphy 11500 W. Orchard Court West Allis, WI 53214 (414) 543-7300

atrick Murph

Signature:

Consultant:

Timothy J. Anderson United Engineering Consultants, Inc. 16237 W. Ryerson Road New Berlin, Wisconsin 53151 (262) 785-1447

DNR:

Riley Neumann Wisconsin Department of Natural Resources Remediation and Redevelopment Program 2300 N. Dr. Martin Luther King Jr. Drive Milwaukee, Wisconsin 53212 (414) 263-8699 State of Wisconsin Department of Natural Resources dnr.wi.gov

Continuing Obligations Inspection and Maintenance Log Form 4400-305 (2/14)

Page 1 of 2

Directions: In accordance with s. NR 727.05 (1) (b) 3., Wis. Adm. Code, use of this form for documenting the inspections and maintenance of certain continuing obligations is required. Personal information collected will be used for administrative purposes and may be provided to requesters to the extent required by Wisconsin's Open Records law [ss. 19.31-19.39, Wis. Stats.]. When using this form, identify the condition that is being inspected. See the closure approval letter for this site for requirements regarding the submittal of this form to the Department of Natural Resources. A copy of this inspection log is required to be maintained either on the property, or at a location specified in the closure approval letter. Do NOT delete previous inspection results. This form was developed to provide a continuous history of site inspection results. The Department of Natural Resources project manager is identified in the closure letter. The project manager may also be identified from the database, BRRTS on the Web, at http://dnr.wi.gov/botw/SetUpBasicSearchForm.do, by searching for the site using the BRRTS ID number, and then looking in the "Who" section.

Activity (Site	e) Name				BRRTS No.	
	Insulation Comp				03-41-18212	6
Inspections	are required to be annual semi-a other –	nnually	approval letter):	When submittal of this form is required, submit manager. An electronic version of this filled out the following email address (see closure appro	the form electronically to the torm, or a scanned version r	DNR project
Inspection Date	Inspector Name	Item	Describe the condition of the item that is being inspected	Recommendations for repair or mainte	Previous recommendation implemented?	s Photographs taken and attached?
	Patrick Murphy	monitoring well cover/barrier vapor mitigation system other:			O y O n	OYON
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3-41-182126 RRTS No.	City Wide Insulation			Continuing Obligations Inspection and Maintenance Form 4400-305 (2/14) Page							
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		3									
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						e.					
Title:				Title:							

State of Wisconsin DEPARTMENT OF NATURAL RESOURCES 2300 N. Dr. Martin Luther King, Jr. Drive Milwaukee WI 53212-3128

Scott Walker, Governor Cathy Stepp, Secretary Telephone 608-266-2621 Toll Free 1-888-936-7463 TTY Access via relay - 711



August 23, 2017

Mr. Patrick Murphy City Wide Insulation Company, Inc. 11500 W. Orchard Court #3 West Allis, WI 53214

> Subject: Remaining Actions Needed City Wide Insulation, 2159 S. 116th St., West Allis, Wisconsin BRRTS #: 03-41-182126, FID #: 241898910, PECFA #: 53227-1093-59

Dear Mr. Murphy:

The DNR reviewed the request for closure on January 26, 2017, for compliance with state laws and standards to maintain consistency in the closure of these cases. Additional investigative activities were required in a letter dated February 7, 2017. A revised closure request was received on August 16, 2017, documenting the additional investigation. The following actions are needed to complete our review of your request. Upon completion of these actions, closure approval will be provided.

Remaining Actions Needed

Monitoring Well or Remedial System Piping Abandonment

The monitoring wells at the site must be properly abandoned in accordance with Wis. Admin. § NR 141. Documentation of well abandonment for all wells must be submitted to the DNR Project Manager, Riley Neumann, on Form 3300-005, found at <u>http://dnr.wi.gov/topic/groundwater/forms.html</u>.

Documentation

When the required actions have been completed, submit the appropriate documentation within 30 days of the date of this letter, to verify their completion. At that point, your closure request can be approved and your case can be closed.

Submit all changes to the original closure request in one final, complete compact disk. For the paper copy, only revisions or updates need to be submitted. The submittal of both an electronic and paper copy are required in accordance with Wis. Admin. § NR 726.09 (1).

GIS Registry

Your site will be listed on the DNR Remediation and Redevelopment Program's GIS Registry, to provide public notice of remaining contamination and continuing obligations. The continuing obligations will be specified in the final closure approval. Information that was submitted with your closure request application will be included on the Bureau for Remediation and Redevelopment Tracking System (BRRTS on the Web), at http://dnr.wi.gov/topic/Brownfields/rrsm.html.

In Conclusion

We appreciate your efforts to restore the environment at this site. This remedial action project is nearing completion. I look forward to working with you to complete all remaining actions that are necessary to achieve closure.



If you have any questions regarding this letter, please contact Riley Neumann at (414) 263-8699, or by email at riley.neumann@wisconsin.gov.

Sincerely,

Whilele K. Komon

Michele R. Norman Southeast Region Team Supervisor Remediation & Redevelopment Program

cc: Timothy Anderson, United Engineering Consultants, Inc. (electronic)

SUBMIT AS UNBOUND PACKAGE IN THE ORDER SHOWN

Notice: Pursuant to ch. 292, Wis. Stats., and chs. NR 726 and 746, Wis. Adm. Code, this form is required to be completed for case closure requests. The closure of a case means that the Department of Natural Resources (DNR) has determined that no further response is required at that time based on the information that has been submitted to the DNR. All sections of this form must be completed unless otherwise directed by the Department. DNR will consider your request administratively complete when the form and all sections are completed, all attachments are included, and the applicable fees required under ch. NR 749, Wis. Adm. Code, are included, and sent to the proper destinations. Personal information collected will be used for administrative purposes and may be provided to requesters to the extent required by Wisconsin's Open Records Law (ss. 19.31 - 19.39, Wis. Stats.). Incomplete forms will be considered "administratively incomplete" and processing of the request will stop until required information is provided.

Site Information	9							
BRRTS No.	VPLE No.							
03-41-182126								
Parcel ID No.								
48-29-999007								
FID No.	WTM Coordinates							
241898910	X 678352 Y	283202	2					
BRRTS Activity (Site) Name	WTM Coordinates Represent:							
CITY WIDE INSULATION CO	Source Area Parcel	Center						
Site Address	City	State	ZIP Code					
2159 S. 116TH STREET	WEST ALLIS	WI	53227					
Acres Ready For Use								
U).5							
Responsible Party (RP) Name PATRICK MURPHY								
Company Name								
CITY WIDE INSULATION COMPANY, INC.								
Mailing Address	City	State	ZIP Code					
11500 W. ORCHARD COURT #3	WEST ALLIS	WI	53214					
Phone Number (414) 543-7300	Email PAT@CITYWIDEINSULATIONWI.COM							
\boxtimes Check here if the RP is the owner of the source property.								
Environmental Consultant Name TIMOTHY J. ANDERSON								
Consulting Firm UNITED ENGINEERING CONSULTANTS, INC.								
Mailing Address	City	State	ZIP Code					
16237 W. RYERSON ROAD	NEW BERLIN	WI	53151					
Phone Number	Email	<u> </u>						
(262) 785-1447	TAUEC@SBCGLOBAL.NET							
Fees and Mailing of Closure Request			D A					
 Send a copy of page one of this form and the applicable ch. N (Environmental Program Associate) at http://dnr.wi.gov/topic. 								
\$1,050 Closure Fee	\$300 Database Fee for Soil							
\$350 Database Fee for Groundwater or Monitoring Wells (Not Abandoned)	Total Amount of Payment \$ 							
 Send one paper copy and one e-copy on compact disk of t assigned to your site. Submit as <u>unbound, separate document</u> electronic document submittal requirements, see <u>http://dnr.wi</u>. 	he entire closure package to the Regional Pro							

Activity (Site) Name

Site Summary

If any portion of the Site Summary Section is not relevant to the case closure request, you must fully explain the reasons why in the relevant section of the form. All information submitted shall be legible. Providing illegible information will result in a submittal being considered incomplete until corrected.

1. General Site Information and Site History

- A. Site Location: Describe the physical location of the site, both generally and specific to its immediate surroundings. The site is located at 2159 S. 116th Street in the City of West Allis, Wisconsin 53227 within the SE 1/4 of the SW 1/4 of Section 6, Township 6 North, Range 21 East of Milwaukee County. The parcel is located 800 feet north of Lincoln Avenue on the west side of the S. 116th right-of-way.
- B. Prior and current site usage: Specifically describe the current and historic occupancy and types of use.

The subject property is currently occupied by City Wide Insulation Company (CWI) which is a residential and commercial insulation removal and installation contractor. CWI purchased the site on February 10, 1960 from J.P. Murphy Inc, and has utilized the site for office space and warehousing. The site was previously utilized for company fleet refueling using two (2) Underground Storage Tanks (USTs) located immediately adjacent to the southeast corner of the site building from 1963 to 1997.

C. Current zoning (e.g., industrial, commercial, residential) for the site and for neighboring properties, and how verified (Provide documentation in Attachment G).

The site is zoned M-1 for local West Allis manufacturing districts which manufacture a wide range of goods and products. The M-1 district tends to be less urban with larger lots and setbacks. Zoning was verified on the City of West Allis assessor website.

D. Describe how and when site contamination was discovered.

On December 23, 1997, two (2) USTs containing leaded and unleaded gasoline were abandoned by removal under the supervision of Harenda Enterprises. One (1) soil sample was collected to confirm the presence of petroleum soil contamination beneath the one thousand (1,000) gallon UST. The analytical results indicated that Gasoline Range Organics (GRO) was detected at a concentration of 3,200 mg/kg (parts per million) beneath the approximate center of the one thousand (1,000) gallon UST.

On July 30, 1998, United and Pool Boy Installation, Inc. advanced several test pit excavations in the area of the former USTs. The test pits were advanced to determine if the petroleum impacted soil encountered during the removal of the USTs was limited to the location of the former tanks. Several samples were collected from various depths and screened with a Photoionization Detector (PID). The results indicated PID levels ranging from one hundred eighty (180) to three hundred (300) parts per million (ppm).

- E. Describe the type(s) and source(s) or suspected source(s) of contamination. Leaded gasoline from a former five hundred fifty (550) gallon UST and/or unleaded gasoline from a former one thousand (1000) gallon UST.
- F. Other relevant site description information (or enter Not Applicable). Not Applicable
- G. List BRRTS activity/site name and number for BRRTS activities at this source property, including closed cases. BRRTS Site Name: CITY WIDE INSULATION CO Activity #: 03-41-182126 Type: OPEN LUST
- H. List BRRTS activity/site name(s) and number(s) for all properties immediately adjacent to (abutting) this source property. Greenfield Motor Truck (#03-41-003262) located immediately adjacent to the south. LUST site closed June 8, 2016

2. General Site Conditions

A. Soil/Geology

i. Describe soil type(s) and relevant physical properties, thickness of soil column across the site, vertical and lateral variations in soil types.

The shallow subsurface at the site consists of fill underlain by glacial till overburden. Fill consisting of brown silty clay with varying amounts of sand and gravel extends from the remnants of an asphaltic concrete pavement section to an approximate depth of three and one-half (3 1/2) to seven (7) feet below the existing ground surface. The underlying native overburden soils are consistent with glacial till material and typically consist of brown and gray silty clay to clayey silt with varying amounts of sand and gravel to at least the termination depth of the boreholes.

- ii. Describe the composition, location and lateral extent, and depth of fill or waste deposits on the site. The fill soils typically consist of brown silty clay with varying amounts of sand and gravel and extend to approximate depths ranging from three and one-half (3 1/2) to seven (7) feet. The cohesive fill soils are anticipated laterally across the majority or all of the subject property with the exception of the location of the former USTs. Brown to black silty sand to sandy silt with varying amounts of gravel extends to approximate depths ranging from four (4) to six (6) feet in the immediate area of the former tanks.
- iii. Describe the depth to bedrock, bedrock type, competency and whether or not it was encountered during the investigation. Depth to bedrock in this region ranges from fifty (50) to one hundred (100) feet. The uppermost bedrock unit below the subject site is believed to be the Silurian age dolomite including the Cayugan, Nagaran, and Alexandrian series. This formation is predominantly dolomite but contains interbedded chert layers. Underlying the Silurian-aged dolomite, is the Ordovician system predominately of dolomite with some sandstone and shale layers. Bedrock was not encountered during the investigation.
- iv. Describe the nature and locations of current surface cover(s) across the site (e.g., natural vegetation, landscaped areas, gravel, hard surfaces, and buildings).

The subject parcel is occupied by a single story building, approximately six thousand (6,000) square feet in plan dimension. Asphaltic concrete and concrete covers approximately eighteen thousand (18,000) square feet of the surface of the parcel extending from the site structure to the S. 116th right-of-way, to the north and south property borders and west to approximately six thousand (6,000) square feet of natural vegetation. The natural vegetation extends to the western property line.

- B. Groundwater
 - i. Discuss depth to groundwater and piezometric elevations. Describe and explain depth variations, including high and low water table elevation and whether free product affects measurement of water table elevation. Describe the stratigraphic unit(s) where water table was found or which were measured for piezometric levels.

Groundwater elevation measurements recorded during four (4) sampling events indicate the depth to groundwater ranges from approximately three and one-half (3 1/2) to five and one-half (5 1/2) feet below the existing grade. The groundwater is typically located in brown silty clay with little sand and gravel. No free product was encountered in any of the wells during any of the sampling events.

ii. Discuss groundwater flow direction(s), shallow and deep. Describe and explain flow variations, including fracture flow if present.

An easterly to southeasterly shallow groundwater flow direction was measured during the three (3) sampling events. The deeper unconfined water table is estimated to be greater than twenty (20) feet and flows to the east towards Lake Michigan. Fracture flow was not observed.

iii. Discuss groundwater flow characteristics: hydraulic conductivity, flow rate and permeability, or state why this information was not obtained.

The hydraulic conductivity of the silty clay soils is estimated to be 0.000001 cm/second or less, while the hydraulic conductivity of the silty sand, sand and gravel is estimated to be 0.001 cm/second or more.

iv. Identify and describe locations/distance of potable and/or municipal wells within 1200 feet of the site. Include general summary of well construction (geology, depth of casing, depth of screened or open interval).
 No potable or municipal wells are located within twelve hundred (1200) feet of the site.

3. Site Investigation Summary

A. General

i. Provide a brief summary of the site investigation history. Reference previous submittals by name and date. Describe site investigation activities undertaken since the last submittal for this project and attach the appropriate documentation in Attachment C, if not previously provided.

A Phase II Environmental Site Assessment (ESA) performed in January of 2014 included the advancement of five (5) soil borings to approximate depths of twelve (12) feet in the location of the former USTs and extending radially outward. Three (3) of the boreholes were converted to temporary monitoring wells. The collected soil samples were analyzed for the presence of GRO, PVOC and Naphthalene. The groundwater samples were analyzed for the presence of VOC. Subsequent investigative activities in July of 2014 included the advancement of three (3) additional boreholes to approximate depths ranging from ten (10) to fifteen (15) feet and the installation of three (3) NR 141 compliant groundwater monitoring wells. The collected soil samples were analyzed for the presence of GRO, PVOC and Naphthalene. The groundwater samples were analyzed for the presence of GRO, PVOC and Naphthalene. The groundwater samples were analyzed for the presence of GRO, PVOC and Naphthalene. The groundwater samples were analyzed for the presence of GRO, PVOC and Naphthalene. The groundwater samples were analyzed for the presence of VOC. The analytical results were summarized in a Phase II Environmental Site Investigation report dated November 4, 2016. At the request of the WDNR, two (2) additional soil borings, GP-9 and GP-10, were advanced to approximate depths of eight (8) and twelve (12) feet below the existing ground surface adjacent to the southeast corner of the site building on March 8, 2017. Two (2) samples were collected from each boring for laboratory analysis. The WDNR also requested that a groundwater sample be collected from MW-1 and a sub-slab vapor sample be collected at the southeast corner of the site building. The collected soil, groundwater and vapor samples were analyzed for the presence of PVOC and Naphthalene. The analytical results were summarized in a letter report dated April 12, 2017.

- ii. Identify whether contamination extends beyond the source property boundary, and if so describe the media affected (e.g., soil, groundwater, vapors and/or sediment, etc.), and the vertical and horizontal extent of impacts.
 It is not believed that petroleum contamination from the former USTs extends beyond the source property's boundaries.
- iii. Identify any structural impediments to the completion of site investigation and/or remediation and whether these impediments are on the source property or off the source property. Identify the type and location of any structural impediment (e.g., structure) that also serves as the performance standard barrier for protection of the direct contact or the groundwater pathway.

No structural impediments to the completion of the site investigation are present on or off the source property.

B. Soil

i. Describe degree and extent of soil contamination. Relate this to known or suspected sources and known or potential receptors/migration pathways.

The results of the laboratory analysis performed during the site investigation indicate Ethylbenzene, Naphthalene, 1,2,4-Trimethylbenzene and total Xylenes are present in the soil at concentrations which exceed their Industrial and Non-Industrial Direct Contact RCLs at approximate depths ranging from three (3) to three and one-half (3 $\frac{1}{2}$) feet in the area of the former USTs.

Ethylbenzene, Naphthalene, total Trimethylbenzenes and Xylenes are present in the soil at approximate depths ranging from three (3) to four (4) feet at concentrations which exceed their Groundwater Pathway RCLs in the area of the former USTs and extending to the east approximately thirty (30) feet. Toluene is also present in exceedance of its Groundwater Pathway RCL at the above referenced depths in the area of the former USTs. In addition, Benzene is present in exceedance of its Groundwater Pathway RCL at the above referenced depths approximately thirty (30) feet east of the former USTs.

The lateral extent of the petroleum contaminant plume in the soil appears to be generally defined due to the absence of detectable concentrations of PVOC in the outermost borehole locations of GP-2, GP-4, GP-5, GP-6, GP-7, GP-8. The vertical extent of the petroleum compounds with concentrations above their respective Direct Contact or Groundwater Pathway RCLs does not appear to extend below four (4) feet.

ii. Describe the concentration(s) and types of soil contaminants found in the upper four feet of the soil column. The results of the laboratory analysis performed during the site investigation indicate Ethylbenzene, Naphthalene, 1,2,4-Trimethylbenzene and total Xylenes are present in the soil at concentrations which exceed their Industrial and Non-Industrial Direct Contact RCLs at approximate depths ranging from three (3) to three and one-half (3 1/2) feet in the area of the former USTs.

Ethylbenzene, Naphthalene, total Trimethylbenzenes and Xylenes are present in the soil at approximate depths ranging from three (3) to four (4) feet at concentrations which exceed their Groundwater Pathway RCLs in the area of the former USTs and extending to the east approximately thirty (30) feet. Toluene is also present in exceedance of its Groundwater Pathway RCL at the above referenced depths in the area of the former USTs. In addition, Benzene is present in exceedance of its Groundwater Pathway RCL at the above referenced depths approximately thirty (30) feet east of the former USTs.

iii. Identify the ch. NR 720, Wis. Adm. Code, method used to establish the soil cleanup standards for this site. This includes a soil performance standard established in accordance with s. NR 720.08, a Residual Contaminant Level (RCL) established in accordance with s. NR 720.10 that is protective of groundwater quality, or an RCL established in accordance with s. NR 720.12 that is protective of human health from direct contact with contaminated soil. Identify the land use classification that was used to establish cleanup standards. Provide a copy of the supporting calculations/ information in Attachment C.

Industrial and Non-Industrial Direct Contact and Groundwater Pathway RCLs proposed by the WDNR in December of 2012 and revised in May of 2017.

C. Groundwater

i. Describe degree and extent of groundwater contamination. Relate this to known or suspected sources and known or potential receptors/migration pathways. Specifically address any potential or existing impacts to water supply wells or interception with building foundation drain systems.

The most recent round of sampling and laboratory analysis of the three (3) NR 141 compliant monitoring wells indicated the presence of Benzene in exceedance of its ES and PAL and Naphthalene in exceedance of its PAL at MW-1. MW-1 is located in the approximate center of the former USTs. Benzene and Naphthalene have not been detected at MW-2 and MW-3 at concentrations above their respective method detection limits. 1,2-Dichloroethane has been and is currently present at MW-3 at concentrations in exceedance of its PAL. MW-3 is located approximately fifty (50) feet southeast of the former USTs. This compound has not been detected in MW-1 or MW-2 at concentrations at or above its method detection limit in any of the sampling events.

In addition, no ES or PAL exceedances were present in the samples collected from the temporary perimeter wells, TW-2 and TW-4, which were located west and north of the former USTs, respectively. Therefore, the lateral extent of the Benzene concentrations exceeding its ES has generally been defined and is limited to the immediate area of the former USTs and possibly extending to the southeast approximately twenty five (25) feet. The lateral extent of the Benzene, Naphthalene and 1,2-Dichloroethane concentrations exceeding their respective PALs extends from the immediate area of the former tanks and extends to MW-3. No potential or existing impacts to water supply wells or interception with building foundation drain systems is anticipated.

ii. Describe the presence of free product at the site, including the thickness, depth, and locations. Identify the depth and location of the smear zone.

Free product was not encountered during this site investigation.

D. Vapor

i. Describe how the vapor migration pathway was assessed, including locations where vapor, soil gas, or indoor air samples were collected. If the vapor pathway was not assessed, explain reasons why.

At the request of the WDNR, sub-slab vapor sampling was conducted on March 8, 2017 in the southeast corner of the site building immediately northeast of the location of the former USTs in general accordance with WDNR RR-986 Sub-Slab Vapor Sampling Procedures.

The sampling was performed by installing a five-eighth (5/8) inch diameter brass vapor pin with an exterior silicon seal into the concrete slab. The airtightness of the probe seal was confirmed utilizing the water dam method. This method consists of sealing a section of two (2) inch PVC pipe to the concrete floor with a soft pliable adhesive compound and subsequent placement of water in the pipe section. A constant water level indicates an airtight seal.

The vapor sample was collected by connecting a semi-rigid, one-quarter (1/4) inch outside diameter Teflon tube from the vapor pin to a six (6) liter Summa canister regulated at a collection rate of approximately two hundred (200) mL/min. The Summa canister was transported to Pace Analytical Services, Inc. for analysis for the presence of PVOC and Naphthalene by EPA method TO-15.

ii. Identify the applicable DNR action levels and the land use classification used to establish them. Describe where the DNR action levels were reached or exceeded (e.g., sub slab, indoor air or both).

Due to the current utilization of the site building as a commercial business, commercial sub-slab Vapor Risk Screen Levels (VRSL) were determined to be the applicable action levels. VRSL for commercial buildings are based on U.S. EPA, June 2015 Vapor Intrusion Guidance using an Attenuation Factor of 0.03.

The results of the laboratory analysis indicate the presence of Benzene, Ethylbenzene, Naphthalene, Toluene, 1,2,4-Trimethylbenzene, 1,3,5-Trimethylbenzene, m&p-Xylene and o-Xylene in the collected sample at concentrations ranging from an estimated 3.1 μ g/m3 to four hundred ninety (490) μ g/m3. These levels are below their respective commercial sub-slab VRSLs where established. i. Identify whether surface water and/or sediment was assessed and describe the impacts found. If this pathway was not assessed, explain why.

The lateral extent of the impacted soil is limited to the subject property and is currently covered with a building and/or asphaltic concrete. Therefore, the impact to surface water and/or sediment was not assessed.

ii. Identify any surface water and/or sediment action levels used to assess the impacts for this pathway and how these were derived. Describe where the DNR action levels were reached or exceeded.
 The lateral extent of the impacted soil is limited to the subject property and is currently covered with a building and/or

asphaltic concrete. Therefore, the impact to surface water and/or sediment was not assessed and it is assumed no DNR action levels were reached or exceeded.

4. Remedial Actions Implemented and Residual Levels at Closure

A. General: Provide a brief summary of the remedial action history. List previous remedial action report submittals by name and date. Identify remedial actions undertaken since the last submittal for this project and provide the appropriate documentation in Attachment C.

No active remediation was performed at the subject property.

- B. Describe any immediate or interim actions taken at the site under ch NR 708, Wis. Adm. Code. No immediate or interim actions were performed at the site under chapter NR 708.
- C. Describe the *active* remedial actions taken at the source property, including: type of remedial system(s) used for each media affected; the size and location of any excavation or in-situ treatment; the effectiveness of the systems to address the contaminated media and substances; operational history of the systems; and summarize the performance of the active remedial actions. Provide any system performance documentation in Attachment A.7.

No active remedial actions were performed at the site.

- D. Describe the alternatives considered during the Green and Sustainable Remediation evaluation in accordance with NR 722.09 and any practices implemented as a result of the evaluation. No active remedial actions were performed at the site.
- E. Describe the nature, degree and extent of residual contamination that will remain at the source property or on other affected properties after case closure.

Ethylbenzene, Naphthalene, 1,2,4-Trimethylbenzene and total Xylenes will remain in the soil at concentrations which exceed their Industrial and Non-Industrial Direct Contact RCLs at approximate depths ranging from three (3) to three and one-half (3 1/2) feet in the area of the former USTs.

Ethylbenzene, Naphthalene, total Trimethylbenzenes and Xylenes will remain in the soil at approximate depths ranging from three (3) to four (4) feet at concentrations which exceed their Groundwater Pathway RCLs in the area of the former USTs and extending to the east approximately thirty (30) feet. Toluene will also remain in the soil at concentrations in exceedance of its Groundwater Pathway RCL at the above referenced depths in the area of the former USTs. In addition, Benzene will remain in exceedance of its Groundwater Pathway RCL at the above referenced depths approximately thirty (30) feet east of the former USTs.

- F. Describe the residual soil contamination within four feet of ground surface (direct contact zone) that attains or exceeds RCLs established under s. NR 720.12, Wis. Adm. Code, for protection of human health from direct contact. The results of the laboratory analysis performed during the site investigation indicate Ethylbenzene, Naphthalene, 1,2,4-Trimethylbenzene and total Xylenes are present in the soil at concentrations which exceed their Industrial and Non-Industrial Direct Contact RCLs at approximate depths ranging from three (3) to three and one-half (3 1/2) feet in the area of the former USTs.
- G. Describe the residual soil contamination that is above the observed low water table that attains or exceeds the soil standard(s) for the groundwater pathway.

Ethylbenzene, Naphthalene, total Trimethylbenzenes and Xylenes are present in the soil at approximate depths ranging from three (3) to four (4) feet at concentrations which exceed their Groundwater Pathway RCLs in the area of the former USTs and extending to the east approximately thirty (30) feet. Toluene is also present in exceedance of its Groundwater Pathway RCL at the above referenced depths in the area of the former USTs. In addition, Benzene is present in exceedance of its Groundwater Pathway RCL at the above referenced depths approximately thirty (30) feet east of the former USTs.

H. Describe how the residual contamination will be addressed, including but not limited to details concerning: covers, engineering controls or other barrier features; use of natural attenuation of groundwater; and vapor mitigation systems or measures.

The existing six (6) inch concrete floor slab and three (3) inches of asphaltic concrete underlain by approximately six (6) inches of granular base course pavement section which is currently in place above the impacted soil at concentrations above the Groundwater Pathway and Industrial and Non-Industrial Direct Contact RCLs will be maintained by the property owner as an impermeable barrier.

- If using natural attenuation as a groundwater remedy, describe how the data collected supports the conclusion that natural attenuation is effective in reducing contaminant mass and concentration (e.g., stable or receding groundwater plume). The ES exceedances in the groundwater is limited to Benzene at MW-1 which is located in the approximate center of the former USTs. Although the Benzene concentration has fluctuated from non-detect to 22.6 μg/L since August of 2014 at MW-1, the Benzene plume is relatively stable due to its absence in MW-2 and MW-3 located down gradient to the east-southeast of MW-1. Therefore, natural attenuation will result in the reduction of the Benzene concentration at MW-1 below its ES and PAL in a reasonable period of time.
- J. Identify how all exposure pathways (soil, groundwater, vapor) were removed and/or adequately addressed by immediate, interim and/or remedial action(s).
 Immediate, interim and/or remedial action(s) were not performed at the subject property.
- K. Identify any system hardware anticipated to be left in place after site closure, and explain the reasons why it will remain. None
- L. Identify the need for a ch. NR 140, Wis. Adm. Code, groundwater Preventive Action Limit (PAL) or Enforcement Standard (ES) exemption, and identify the affected monitoring points and applicable substances. No ES and PAL exemptions are necessary.
- M. If a DNR action level for vapor intrusion was exceeded (for indoor air, sub slab, or both) describe where it was exceeded and how the pathway was addressed.
 A DNR action level for sub-slab vapor intrusion was not exceeded in the sample collected on March 8, 2017 at the southeast corner of the site building.
- N. Describe the surface water and/or sediment contaminant concentrations and areas after remediation. If a DNR action level was exceeded, describe where it was exceeded and how the pathway was addressed. No compounds are present at concentrations which exceed their respective commercial sub-slab VRSL. Therefore, indoor air vapor quality was not addressed.

5. Continuing Obligations: Situations where sites, including all affected properties and rights-of-way (ROWs), are included on the DNR's GIS Registry. In certain situations, maintenance plans are also required, and must be included in Attachment D.

Directions: For each of the 3 property types below, check all situations that apply to this closure request. (NOTE: Monitoring wells to be transferred to another site are addressed in Attachment E.)

		n applies to t r Right of Wa			
	Property Typ	e:		Case Closure Situation - Continuing Obligation Inclusion on the GIS Registry is Required (ii xiv.)	Maintenance Plan
	Source Property	Affected Property (Off-Source)	ROW		Required
i.		\square	\times	None of the following situations apply to this case closure request.	NA
ii.	\ge			Residual groundwater contamination exceeds ch. NR 140 ESs.	NA
iii.	\ge			Residual soil contamination exceeds ch. NR 720 RCLs.	NA
iv.				Monitoring Wells Remain:	
				Not Abandoned (filled and sealed)	NA
				Continued Monitoring (requested or required)	Yes
v.	\times			Cover/Barrier/Engineered Cover or Control for (soil) direct contact pathways (includes vapor barriers)	Yes
vi.	\times			Cover/Barrier/Engineered Cover or Control for (soil) groundwater infiltration pathway	Yes
vii.				Structural Impediment: impedes completion of investigation or remedial action (not as a performance standard cover)	NA
viii.				Residual soil contamination meets NR 720 industrial soil RCLs, land use is classified as industrial	NA
ix.			NA	Vapor Mitigation System (VMS) required due to exceedances of vapor risk screening levels or other health based concern	Yes
x.			NA	Vapor: Dewatering System needed for VMS to work effectively	Yes
xi.			NA	Vapor: Compounds of Concern in use: full vapor assessment could not be completed	NA
xii			NA	Vapor: Commercial/industrial exposure assumptions used.	NA
xiii.				Vapor: Residual volatile contamination poses future risk of vapor intrusion	NA
xiv.				Site-specific situation: (e.g., fencing, methane monitoring, other) (discuss with project manager before submitting the closure request)	Site specific

6. Underground Storage Tanks

A.	Were any tanks, piping or other associated tank system components removed as part of the investigation or remedial action?	⊖ Yes	● No
В.	Do any upgraded tanks meeting the requirements of ch. ATCP 93, Wis. Adm. Code, exist on the property?	⊖ Yes	No
C.	If the answer to question 6.B. is yes, is the leak detection system currently being monitored?	⊖ Yes	🔿 No

Activity (Site) Name

General Instructions

All information shall be legible. Providing illegible information will result in a submittal being considered incomplete until corrected. For each attachment (A-G), provide a Table of Contents page, listing all 'applicable' and 'not applicable' items by Closure Form titles (e.g., A.1. Groundwater Analytical Table, A.2. Soil Analytical Results Table, etc.). If any item is 'not applicable' to the case closure request, you must fully explain the reasons why.

Data Tables (Attachment A)

Directions for Data Tables:

- Use **bold** and italics font for information of importance on tables and figures. Use **bold** font for ch. NR 140, Wis. Adm. Code ES attainments or exceedances, and *italicized font* for ch. NR 140, Wis. Adm. Code, PAL attainments or exceedances.
- Use **bold** font to identify individual ch. NR 720 Wis. Adm. Code RCL exceedances. Tables should also include the corresponding groundwater pathway and direct contact pathway RCLs for comparison purposes. Cumulative hazard index and cumulative cancer risk exceedances should also be tabulated and identified on Tables A.2 and A.3.
- Do not use shading or highlighting on the analytical tables.
- Include on Data Tables the level of detection for results which are below the detection level (i.e., do not just list as no detect (ND)).
 Include the units on data tables.
- Include the units on data tables.
- Summaries of all data <u>must</u> include information collected by previous consultants.
- Do not submit lab data sheets unless these have not been submitted in a previous report. Tabulate all data required in s. NR 716.15(3)(c), Wis. Adm. Code, in the format required in s. NR 716.15(4)(e), Wis. Adm. Code.
- Include in Attachment A all of the following tables, in the order prescribed below, with the specific Closure Form titles noted on the separate attachments (e.g., Title: A.1. Groundwater Analytical Table; A.2. Soil Analytical Results Table, etc.).
- For required documents, each table (e.g., A.1., A.2., etc.) should be a separate Portable Document Format (PDF).

A. Data Tables

- A.1. **Groundwater Analytical Table(s):** Table(s) showing the analytical results and collection dates for all groundwater sampling points (e.g., monitoring wells, temporary wells, sumps, extraction wells, potable wells) for which samples have been collected.
- A.2. Soil Analytical Results Table(s): Table(s) showing all soil analytical results and collection dates. Indicate if sample was collected above or below the observed low water table (unsaturated versus saturated).
- A.3. **Residual Soil Contamination Table(s):** Table(s) showing the analytical results of only the residual soil contamination at the time of closure. This table shall be a subset of table A.2 and should include only the soil sample locations that exceed an RCL. Indicate if sample was collected above or below the observed low water table (unsaturated versus saturated). Table A.3 is optional only if a total of fewer than 15 soil samples have been collected at the site.
- A.4. **Vapor Analytical Table(s)**: Table(s) showing type(s) of samples, sample collection methods, analytical method, sample results, date of sample collection, time period for sample collection, method and results of leak detection, and date, method and results of communication testing.
- A.5. Other Media of Concern (e.g., sediment or surface water): Table(s) showing type(s) of sample, sample collection method, analytical method, sample results, date of sample collection, and time period for sample collection.
- A.6. Water Level Elevations: Table(s) showing all water level elevation measurements and dates from all monitoring wells. If present, free product should be noted on the table.
- A.7. **Other:** This attachment should include: 1) any available tabulated natural attenuation data; 2) data tables pertaining to engineered remedial systems that document operational history, demonstrate system performance and effectiveness, and display emissions data; and (3) any other data tables relevant to case closure not otherwise noted above. If this section is not applicable, please explain the reasons why.

Maps, Figures and Photos (Attachment B)

03-41-182126	CITY WIDE INSULATION CO
BRRTS No.	Activity (Site) Name

Directions for Maps, Figures and Photos:

- Provide on paper no larger than 11 x 17 inches, unless otherwise directed by the Department. Maps and figures may be submitted in a larger electronic size than 11 x 17 inches, in a PDF readable by the Adobe Acrobat Reader. However, those larger-size documents must be legible when printed.
- Prepare visual aids, including maps, plans, drawings, fence diagrams, tables and photographs according to the applicable portions of ss. NR 716.15(4), 726.09(2) and 726.11(3), (5) and (6), Wis. Adm. Code.
- Include <u>all</u> sample locations.
- Contour lines should be clearly labeled and defined.
- Include in Attachment B all of the following maps and figures, in the order prescribed below, with the specific Closure Form titles noted on the separate attachments (e.g., Title: B.1. Location Map; B.2. Detailed Site Map, etc).
- For the electronic copies that are required, each map (e.g., B.1.a., B.2.a, etc.,) should be a separate PDF.
- Maps, figures and photos should be dated to reflect the most recent revision.
 - B.1. Location Maps
 - B.1.a. Location Map: A map outlining all properties within the contaminated site boundaries on a United States Geological Survey (U.S.G.S.) topographic map or plat map in sufficient detail to permit easy location of all affected and/or adjacent parcels. If groundwater standards are exceeded, include the location of all potable wells, including municipal wells, within 1200 feet of the area of contamination.
 - B.1.b. Detailed Site Map: A map that shows all relevant features (buildings, roads, current ground surface cover, individual property boundaries for all affected properties, contaminant sources, utility lines, monitoring wells and potable wells) within the contaminated area. This map is to show the location of all contaminated public streets, and highway and railroad rights-of-way in relation to the source property and in relation to the boundaries of groundwater contamination attaining or exceeding a ch. NR 140 ES, and/or in relation to the boundaries of soil contamination attaining or exceeding a RCL. Provide parcel identification numbers for all affected properties.
 - B.1.c. **RR Sites Map:** From RR Sites Map (http://dnrmaps.wi.gov/sl/?Viewer=RR Sites) attach a map depicting the source property, and all open and closed BRRTS sites within a half-mile radius or less of the property.

B.2. Soil Figures

- B.2.a. **Soil Contamination:** Figure(s) showing the location of <u>all</u> identified unsaturated soil contamination. Use a single contour to show the horizontal extent of each area of contiguous soil contamination that exceeds a soil to groundwater pathway RCL as determined under ch. NR 720.Wis. Adm. Code. A separate contour line should be used to indicate the horizontal extent of each area of contiguous soil contamination that exceeds a direct contact RCL exceedances (0-4 foot depth).
- B.2.b. **Residual Soil Contamination:** Figure(s) showing only the locations of soil samples where unsaturated soil contamination remains at the time of closure (locations represented in Table A.3). Use a single contour to show the horizontal extent of each area of contiguous soil contamination that exceeds a soil to groundwater pathway RCL as determined under ch. NR 720 Wis. Adm. Code. A separate contour line should be used to indicate the horizontal extent of each area of contiguous soil contamination that exceeds a direct contact RCL exceedence (0-4 foot depth).

B.3. Groundwater Figures

- B.3.a. **Geologic Cross-Section Figure(s):** One or more cross-section diagrams showing soil types and correlations across the site, water table and piezometric elevations, and locations and elevations of geologic rock units, if encountered. Display on one or more figures all of the following:
 - Source location(s) and vertical extent of residual soil contamination exceeding an RCL. Distinguish between
 direct contact and the groundwater pathway RCLs.
 - Source location(s) and lateral and vertical extent if groundwater contamination exceeds ch. NR 140 ES.
 - Surface features, including buildings and basements, and show surface elevation changes.
 - Any areas of active remediation within the cross section path, such as excavations or treatment zones.
 - Include a map displaying the cross-section location(s), if they are not displayed on the Detailed Site Map (Map B.1.b.)
- B.3.b. **Groundwater Isoconcentration:** Figure(s) showing the horizontal extent of the post-remedial groundwater contamination exceeding a ch. NR 140, Wis. Adm. Code, PAL and/or an ES. Indicate the date and direction of groundwater flow based on the most recent sampling data.
- B.3.c. Groundwater Flow Direction: Figure(s) representing groundwater movement at the site. If the flow direction varies by more than 20° over the history of the site, submit two groundwater flow maps showing the maximum variation in flow direction.
- B.3.d. **Monitoring Wells:** Figure(s) showing all monitoring wells, with well identification number. Clearly designate any wells that: (1) are proposed to be abandoned; (2) cannot be located; (3) are being transferred; (4) will be retained for further sampling, or (5) have been abandoned.

B.4. Vapor Maps and Other Media

- B.4.a. **Vapor Intrusion Map:** Map(s) showing all locations and results for samples taken to investigate the vapor intrusion pathway in relation to residual soil and groundwater contamination, including sub-slab, indoor air, soil vapor, soil gas, ambient air, and communication testing. Show locations and footprints of affected structures and utility corridors, and/or where residual contamination poses a future risk of vapor intrusion.
- B.4.b. Other media of concern (e.g., sediment or surface water): Map(s) showing all sampling locations and results for other media investigation. Include the date of sample collection and identify where any standards are exceeded.
- B.4.c. Other: Include any other relevant maps and figures not otherwise noted above. (This section may remain blank).
- **B.5.** Structural Impediment Photos: One or more photographs documenting the structural impediment feature(s) which precluded a complete site investigation or remediation at the time of the closure request. The photographs should document the area that could not be investigated or remediated due to a structural impediment. The structural impediment should be indicated on Figures B.2.a and B.2.b.

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Directions for Documentation of Remedial Action:

- Include in Attachment C all of the following documentation, in the order prescribed below, with the specific Closure Form titles noted on the separate attachments (e.g., Title: C.1. Site Investigation Documentation; C.2. Investigative Waste, etc.).
- If the documentation requested below has already been submitted to the DNR, please note the title and date of the report for that particular document requested.
 - C.1. Site investigation documentation, that has not otherwise been submitted with the Site Investigation Report.
 - C.2. Investigative waste disposal documentation.
 - C.3. Provide a **description of the methodology** used along with all supporting documentation if the RCLs are different than those contained in the Department's RCL Spreadsheet available at: http://dnr.wi.gov/topic/Brownfields/Professionals.html.
 - C.4. Construction documentation or as-built report for any constructed remedial action or portion of, or interim action specified in s. NR 724.02(1), Wis. Adm. Code.
 - C.5. **Decommissioning of Remedial Systems.** Include plans to properly abandon any systems or equipment.
 - C.6. Other. Include any other relevant documentation not otherwise noted above (This section may remain blank).

Maintenance Plan(s) and Photographs (Attachment D)

Directions for Maintenance Plans and Photographs:

Attach a maintenance plan for each affected property (source property, each off-source affected property) with continuing obligations requiring future maintenance (e.g., direct contact, groundwater protection, vapor intrusion). See Site Summary section 5 for all affected property(s) requiring a maintenance plan. Maintenance plan guidance and/or templates for: 1) Cover/barrier systems; 2) Vapor intrusion; and 3) Monitoring wells, can be found at: http://dnr.wi.gov/topic/Brownfields/Professionals.html#tabx3

- D.1. Descriptions of maintenance action(s) required for maximizing effectiveness of the engineered control, vapor mitigation system, feature or other action for which maintenance is required:
 - Provide brief descriptions of the type, depth and location of residual contamination.
 - Provide a description of the system/cover/barrier/monitoring well(s) to be maintained.
 - Provide a description of the maintenance actions required for maximizing effectiveness of the engineered control, vapor mitigation system, feature or other action for which maintenance is required.
 - Provide contact information, including the name, address and phone number of the individual or facility who will be conducting the maintenance.
- D.2. Location map(s) which show(s): (1) the feature that requires maintenance; (2) the location of the feature(s) that require(s) maintenance on and off the source property; (3) the extent of the structure or feature(s) to be maintained, in relation to other structures or features on the site; (4) the extent and type of residual contamination; and (5) all property boundaries.
- D.3. **Photographs** for site or facilities with a cover or other performance standard, a structural impediment or a vapor mitigation system, include one or more photographs documenting the condition and extent of the feature at the time of the closure request. Pertinent features shall be visible and discernible. Photographs shall be submitted with a title related to the site name and location, and the date on which it was taken.
- D.4. **Inspection log**, to be maintained on site, or at a location specified in the maintenance plan or approval letter. The inspection and maintenance log is found at: http://dnr.wi.gov/files/PDF/forms/4400/4400-305.pdf.

Monitoring Well Information (Attachment E)

Directions for Monitoring Well Information:

For all wells that will remain in use, be transferred to another party, or that could not be located; attach monitoring well construction and development forms (DNR Form 4400-113 A and B: http://dnr.wi.gov/topic/groundwater/documents/forms/4400 113 1 2.pdf)

Select One:

- O No monitoring wells were installed as part of this response action.
- All monitoring wells have been located and will be properly abandoned upon the DNR granting conditional closure to the site

○ Select One or More:

- Not all monitoring wells can be located, despite good faith efforts. Attachment E must include a description of efforts made to locate the wells.
- One or more wells will remain in use at the site after this closure. Attachment E must include documentation as to the reason(s) the well(s) will remain in use. When one or more monitoring wells will remain in use this is considered a continuing obligation and a maintenance plan will be required and must be included in Attachment D.
- One or more monitoring wells will be transferred to another owner upon case closure being granted. Attachment E should include documentation identifying the name, address and email for the new owner(s). Provide documentation from the party accepting future responsibility for monitoring well(s).

Source Legal Documents (Attachment F)

Directions for Source Legal Documents:

Label documents with the specific closure form titles (e.g., F.1. Deed, F.2. Certified Survey Map, etc.). Include all of the following documents, in the order listed:

F.1. **Deed:** The most recent deed with legal description clearly listed.

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

- F.2. Certified Survey Map: A copy of the certified survey map or the relevant section of the recorded plat map for those properties where the legal description in the most recent deed refers to a certified survey map or a recorded plat map. In cases where the certified survey map or recorded plat map are not legible or are unavailable, a copy of a parcel map from a county land information office may be substituted. A copy of a parcel map from a county land information office shall be legible, and the parcels identified in the legal description shall be clearly identified and labeled with the applicable parcel identification number.
- F.3. Verification of Zoning: Documentation (e.g., official zoning map or letter from municipality) of the property's or properties' current zoning status.
- F.4. **Signed Statement:** A statement signed by the Responsible Party (RP), which states that he or she believes that the attached legal description(s) accurately describe(s) the correct contaminated property or properties. This section applies to the source property only. Signed statements for Other Affected Properties should be included in Attachment G.

Notifications to Owners of Affected Properties (Attachment G)

Directions for Notifications to Owners of Affected Properties:

Complete the table on the following page for sites which require notification to owners of affected properties pursuant to ch. 292, Wis. Stats. and ch. NR 725 and 726, Wis. Adm. Code. Personal information collected will be used for administrative purposes and may be provided to requesters to the extent required by Wisconsin's Open Records law [ss. 19.31- 19.39,Wis. Stats.]. The DNR's "Guidance on Case Closure and the Requirements for Managing Continuing Obligations" (PUB-RR-606) lists specific notification requirements http://dnr.wi.gov/files/PDF/pubs/rr/RR606.pdf.

State law requires that the responsible party provide a 30-day, written advance notification to certain persons prior to applying for case closure. This requirement applies if: (1) the person conducting the response action does not own the source property; (2) the contamination has migrated onto another property; and/or (3) one or more monitoring wells will not be abandoned. Use form 4400-286, Notification of Continuing Obligations and Residual Contamination, at http://dnr.wi.gov/files/PDF/forms/4400/4400-286.pdf

Include a copy of each notification sent and accompanying proof of delivery, i.e., return receipt or signature confirmation. (These items will not be placed on the GIS Registry.)

Include the following documents for each property, keeping each property's documents grouped together and labeled with the letter G and the corresponding ID number from the table on the following page. (Source Property documents should only be included in Attachment F):

- Deed: The most recent deed with legal descriptions clearly listed for all affected properties.
- Note: If a property has been purchased with a land contract and the purchaser has not yet received a deed, a copy of the land contract which includes the legal description shall be submitted instead of the most recent deed. If the property has been inherited, written documentation of the property transfer should be submitted along with the most recent deed.
- Certified Survey Map: A copy of the certified survey map or the relevant section of the recorded plat map for those properties where the legal description in the most recent deed refers to a certified survey map or a recorded plat map. In cases where the certified survey map or recorded plat map are not legible or are unavailable, a copy of a parcel map from a county land information office may be substituted. A copy of a parcel map from a county land information office shall be legible, and the parcels identified in the legal description shall be clearly identified and labeled with the applicable parcel identification number.
- Verification of Zoning: Documentation (e.g., official zoning map or letter from municipality) of the property's or properties' current zoning status.
- Signed Statement: A statement signed by the Responsible Party (RP), which states that he or she believes the attached legal description(s) accurately describe(s) the correct contaminated property or properties.

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CITY WIDE INSULATION CO

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Ν	Iotifications to Owners of Affected Properties	(Attachment G	i)																
									F	Reas	ons	Not	ificat	tion	Lette	er Se	ent:		
ID	Address of Affected Property	Parcel ID No.	Date of Receipt of Letter	Type of Property Owner	WTMX	WTMY	Residual Groundwater Contamination = or > ES	Residual Soil Contamination Exceeds RCLs	Monitoring Wells: Not Abandoned	Monitoring Wells: Continued Monitoring	Cover/Barrier/Engineered Control	Structural Impediment	Industrial RCLs Met/Applied	Vapor Mitigation System(VMS)	Dewatering System Needed for VMS	Compounds of Concern in Use	Commercial/Industrial Vapor Exposure Assumptions Applied	Residual Volatile Contamination Poses Future Risk of Vapor Intrusion	Site Specification Situation

03-41-182126 BRRTS No.

Activity (Site) Name

FRSON

Stamp and Number

E-28935 EST ALLIS

Signatures and Findings for Closure Determination

Check the correct box for this case closure request, and have either a professional engineer or a hydrogeologist, as defined in ch. NR 712, Wis. Adm. Code, sign this document.

A response action(s) for this site addresses groundwater contamination (including natural attenuation remedies).

The response action(s) for this site addresses media other than groundwater.

Engineering Certification

Timothy J. Anderson hereby certify that I am a registered professional engineer E in the State of Wisconsin, registered in accordance with the requirements of ch. A-E 4, Wis. Adm. Code; that this case closure request has been prepared by me or prepared under my supervision in accordance with the Rules of Professional Conduct in ch. A-E 8. Wis, Adm. Code: and that, to the best of my knowledge, all information contained in this case closure request is correct and the document was prepared in compliance with all applicable requirements in chs. NR 700 to 726, Wis. Adm. Code. Specifically, with respect to compliance with the rules, in my professional opinion a site investigation has been conducted in accordance with ch. NR 716, Wis. Adm. Code, and all necessary memodial actions have been completed in accordance with chs. NR 140, NR 718, NR 720, NR 722, NR 724 and NR 26 Wis Adm. C. MINIMUM MINIMUM Codes."

Timothy J. Anderson Printed Name

Signature

Hydrogeologist Certification

Scott J. Brockway

hereby certify that I am a hydrogeologist as that term is 1 defined in s. NR 712.03 (1), Wis. Adm. Code, and that, to the best of my knowledge, all of the information contained in this case closure request is correct and the document was prepared by me or prepared by me or prepared under my supervision and, in compliance with all applicable requirements in chs. NR 700 to 726, Wis. Adm. Code. Specifically, with respect to compliance with the rules, in my professional opinion a site investigation has been conducted in accordance with ch. NR 716, Wis. Adm. Code, and all necessary remedial actions have been completed in accordance with chs. NR 140, NR 718, NR 720, NR 722, NR 724 and NR 726, Wis. Adm. Codes."

8/8/2017 Date

Scott J. Brockway Printed Name

Professional Hydrogeologist

ALTER BREEFE

Title

8/8/2017

Date

ATTACHMENT A – Data Tables

A.1. Groundwater Analytical Table(s) – Applicable

 A.2. Soil Analytical Results Table(s) – Applicable
 A.3. Residual Soil Contamination Table(s) – Applicable
 A.4. Vapor Analytical Table(s) – Applicable

 A.5. Other Media of Concern – Not Applicable – Site investigation did not require the sampling or analysis of sediment, surface water or other media.

 A.6. Water Level Elevations – Applicable

 A.7. Natural Attenuation Data – Not Applicable – Natural attenuation data was not collected

A.7. Natural Attenuation Data – Not Applicable – Natural attenuation data was not collected as a part of the investigation due to the absence of ES exceedances in the groundwater in MW-2 and MW-3.

A. Data Tables

Sample Identification	TW-1	TW-2	TW-4	ES	PAL
Sample Date	01/31/14	01/31/14	01/31/14	ES	PAL
Volatile Organic Compounds (VOC)	(Method: 8260B)	•	•	•	•
Acetone	<1400	7.5J	7.5J	9000	1800
Acrylonitrile	<200	<4.00	<4.00	-	-
Benzene	<100	<2.00	<2.00	5	0.5
Bromodichloromethane	<100	<2.00	<2.00	0.6	0.06
Bromoform	<100	<2.00	<2.00	4.4	0.44
Bromomethane	<1000	<20.0	<20.0	10	1
1-Butanol	<4500	<90.0	<90.0	-	-
2-Butanone	<400	<8.00	<8.00	-	-
Carbon disulfide	<100	<2.00	<2.00	1000	200
Carbon tetrachloride	<100	<2.00	<2.00	5	0.5
Chlorobenzene	<100	<2.00	<2.00	-	-
Chloroethane	<200	<4.00	<4.00	400	80
2-Chloroethyl vinyl ether	<200	<4.00	<4.00	-	-
Chloroform	<100	<2.00	<2.00	6	0.6
Chloromethane	<400	<8.00	<8.00	30	3
1,1-Dichloroethane	<400	<8.00	<8.00	850	85
1,1-Dichloroethene	<200	<4.00	<4.00	7	0.7
Cis-1,2-Dichloroethene	<100	<2.00	<2.00	70	7
Trans-1,2-Dichloroethene	<100	<2.00	<2.00	100	20
1,2-Dibromo-3-chloropropane	<100	<2.00	<2.00	0.2	0.02
1,2-Dibromoethane	<100	<2.00	<2.00	0.05	0.005
1,2-Dichloroethane	<100	<2.00	<2.00	5	0.5
Dibromochloromethane	<100	<2.00	<2.00	60	6
1,2-Dichloropropane	<200	<4.00	<4.00	5	0.5
1,3-Dichloropropene, Total	<200	<4.00	<4.00	0.4	0.04
Ethylbenzene	2030	<2.00	<2.00	700	140
2-Hexanone	<400	<8.00	<8.00	-	-
Methyl tert-butyl ether	<100	<2.00	0.50J	60	12
Methylene chloride	<100	<2.00	<2.00	5	0.5
4-Methyl-2-pentanone	<1400	<28.0	<28.0	-	-
Naphthalene	726	<2.00	<2.00	100	10
Styrene	<200	<4.00	<4.00	100	10

Notes: All results expressed as µg/L (parts per billion)

ES NR140 Enforcement Standard (Exceedances in bold)

PAL NR140 Preventive Action Limit (Exceedances in *italics*)

- ES/PAL not established for this compound

J Analyte detected above limit of detection (LOD) and below limit of quantitation (LOQ)

< Compound not detected at or above the LOD

Sample Identification	TW-1	TW-2	TW-4	ES	PAL
Sample Date	01/31/14	01/31/14	01/31/14	ES	FAL
Volatile Organic Compounds (VOC) (Met	hod: 8260B)				
1,1,1-Trichloroethane	<100	<2.00	<2.00	200	40
1,1,2,2-Tetrachlorethane	<100	<2.00	<2.00	0.2	0.02
Tetrachloroethene	<100	<2.00	<2.00	5	0.5
1,1,2-Trichloroethane	<100	<2.00	<2.00	5	0.5
Trichloroethene	<100	<2.00	<2.00	5	0.5
1,2,3-Trichloropropane	<100	<2.00	<2.00	60	12
1,2,4-Trimethylbenzene	3976	<2.00	<2.00	480	96
1,3,5-Trimethylbenzene	3770	<2.00	<2.00	400	90
Toluene	524	<2.00	<2.00	800	160
Vinyl acetate	<400	<8.00	<8.00	-	-
Vinyl chloride	<100	<2.00	<2.00	0.2	0.02
m,p-Xylene	6680	<4.00	<4.00	-	-
o-Xylene	2560	<2.00	<2.00	-	-
Xylenes, Total	9240	<4.00/<2.00	<4.00/<2.00	2000	400

Notes:

s: All results expressed as µg/L (parts per billion)

ES NR140 Enforcement Standard (Exceedances in bold)

PAL NR140 Preventive Action Limit (Exceedances in *italics*)

- ES/PAL not established for this compound

J Analyte detected above limit of detection (LOD) and below limit of quantitation (LOQ)

< Compound not detected at or above the LOD

Sample Identification		MV	V-1			MW-2		MW-3		ES	PAL	
Sample Date	08/29/14	11/29/14	06/09/15	03/08/17	08/29/14	11/29/14	06/09/15	08/29/14 11/29/14 06/09/15		ES	PAL	
Volatile Organic Compounds (VOC) (Meth	od: 8260B/	GRO95/802	1)	•							
Benzene	<0.24	5.9	<0.44	22.6	<0.24	<0.24	<0.44	<0.24	<0.24	<0.44	5	0.5
Bromobenzene	<0.32	<0.32	<0.48	NA	<0.32	<0.32	<0.48	<0.32	<0.32	<0.48	-	-
Bromodichloromethane	<0.37	<0.37	<0.46	NA	<0.37	<0.37	<0.46	<0.37	<0.37	<0.46	0.6	0.06
Bromoform	<0.35	<0.35	<0.46	NA	<0.35	<0.35	<0.46	<0.35	<0.35	<0.46	4.4	0.44
tert-Butylbenzene	<0.36	<0.36	<1.1	NA	<0.36	<0.36	<1.1	<0.36	<0.36	<1.1	-	-
sec-Butylbenzene	<0.33	4.8	<1.2	NA	<0.33	<0.33	1.26J	<0.33	<0.33	<1.2	-	-
n-Butylbenzene	<0.35	8.3	<1	NA	<0.35	<0.35	1.81J	<0.35	<0.35	<1	-	-
Carbon Tetrachloride	<0.33	<0.33	<0.65	NA	<0.33	<0.33	<0.65	<0.33	<0.33	<0.65	5	0.5
Chlorobenzene	<0.24	<0.24	<0.46	NA	<0.24	<0.24	<0.46	<0.24	<0.24	<0.46	-	-
Chloroethane	<0.63	<0.63	<0.65	NA	<0.63	<0.63	<0.65	<0.63	<0.63	<0.65	400	80
Chloroform	<0.43	<0.28	<0.43	NA	<0.28	<0.28	<0.43	<0.28	<0.28	<0.43	6	0.6
Chloromethane	<0.81	<0.81	<1.9	NA	<0.81	<0.81	<1.9	<0.81	<0.81	<1.9	30	3
2-Chlorotoluene	<0.21	<0.21	<0.4	NA	<0.21	<0.21	<0.4	<0.21	<0.21	<0.4	-	-
4-Chlorotoluene	<0.21	<0.21	<0.63	NA	<0.21	<0.21	<0.63	<0.21	<0.21	<0.63	-	-
1,2-Dibromo-3-chloropropane	<0.88	<0.88	<1.4	NA	<0.88	<0.88	<1.4	<0.88	<0.88	<1.4	0.2	0.02
Dibromochloromethane	<0.22	<0.22	<0.45	NA	<0.22	<0.22	<0.45	<0.22	<0.22	<0.45	60	6
1,4-Dichlorobenzene	<0.3	<0.3	<0.49	NA	<0.3	<0.3	<0.49	<0.3	<0.3	<0.49	75	15
1,3-Dichlorobenzene	<0.28	<0.28	<0.52	NA	<0.28	<0.28	<0.52	<0.28	<0.28	<0.52	600	120
1,2-Dichlorobenzene	<0.36	<0.36	<0.46	NA	<0.36	<0.36	<0.46	<0.36	<0.36	<0.46	600	60
Dichlorodifluoromethane	<0.44	<0.44	<0.87	NA	<0.44	<0.44	<0.87	<0.44	<0.44	<0.87	1000	200
1,2-Dichloroethane	<0.41	<0.41	<0.54	NA	<0.41	<0.41	< 0.54	<u>2.76</u>	<u>4.7</u>	<u>3.1</u>	5	0.5
1,1-Dichloroethane	<0.3	<0.3	<1.1	NA	<0.3	<0.3	<1.1	<0.3	<0.3	<1.1	850	85
1,1-Dichloroethene	<0.4	<0.4	<0.65	NA	<0.4	<0.4	<0.65	<0.4	<0.4	<0.65	7	0.7
cis-1,2-Dichloroethene	<0.38	<0.38	<0.45	NA	<0.38	<0.38	<0.45	<0.38	<0.38	<0.45	70	7
trans-1,2-Dichloroethene	<0.35	<0.35	<0.54	NA	<0.35	<0.35	<0.54	<0.35	<0.35	<0.54	100	20
1,2-Dichloropropane	<0.32	<0.32	<0.43	NA	<0.32	<0.32	<0.43	<0.32	<0.32	<0.43	5	0.5
2,2-Dichloropropane	<0.36	<0.36	<3.1	NA	<0.36	<0.36	<3.1	<0.36	<0.36	<3.1	-	-
1,3-Dichloropropane	<0.33	<0.33	<0.42	NA	<0.33	<0.33	<0.42	<0.33	<0.33	<0.42	0.4	0.04
Di-isopropyl ether	<0.23	<0.23	<0.44	NA	<0.23	<0.23	<0.44	<0.23	<0.23	<0.44	-	-

Notes: All results expressed as µg/L (parts per billion)

ES NR140 Enforcement Standard (Exceedances in bold)

PAL NR140 Preventive Action Limit (Exceedances in *italics*)

J Analyte detected above limit of detection (LOD) and below limit of quantitation (LOQ)

- ES/PAL not established for this compound
- Compound not detected at or above LOD
- NA Compound not analyzed

-

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Sample Identification		M	W-1			MW-2			MW-3			PAL
Sample Date	08/29/14	11/29/14	06/09/15	03/08/17	08/29/14	11/29/14	06/09/15	08/29/14	11/29/14	06/09/15	ES	PAL
Volatile Organic Compounds (VOC) (Metho	od: 8260B/G	RO95/8021)									
1,2-Dibromoethane	<0.44	<0.44	<0.63	NA	<0.44	<0.44	<0.63	<0.44	<0.44	<0.63	0.05	0.005
Ethylbenzene	5.0	116	<0.71	67	<0.55	<0.55	5.8	<0.55	<0.55	<0.71	700	140
Hexachlorobutadiene	<1.5	<1.5	<2.2	NA	<1.5	<1.5	<2.2	<1.5	<1.5	<2.2	-	-
Isopropylbenzene	0.41J	11.8	<0.82	NA	<0.3	<0.3	1.79J	<0.3	<0.3	1.12J	-	-
p-Isopropyltoluene	<0.31	1.3	<1.1	NA	<0.31	<0.31	<1.1	<0.31	<0.31	<1.1	-	-
Methylene chloride	<0.5	<0.5	<1.3	NA	<0.5	<0.5	<1.3	<0.5	<0.5	<1.3	5	0.5
Methyl tert-butyl ether	<0.23	<0.23	<1.1	<4.3	<0.23	<0.23	<1.1	<0.23	<0.23	<1.1	60	12
Naphthalene	<1.7	27.6	<1.6	26.2J	<1.7	<1.7	<1.6	<1.7	<1.7	<1.6	100	10
n-Propylbenzene	0.91	38	<0.77	NA	<0.25	<0.25	5.2	<0.25	<0.25	1.98J	-	-
1,1,2,2-Tetrachloroethane	<0.45	<0.45	<0.52	NA	<0.45	<0.45	<0.52	<0.45	<0.45	<0.52	0.2	0.02
1,1,1,2-Tetrachloroethane	<0.33	<0.33	<0.48	NA	<0.33	<0.33	<0.48	<0.33	<0.33	<0.48	70	7
Tetrachloroethene	<0.33	<0.33	<0.74	NA	< 0.33	<0.33	<0.74	<0.33	<0.33	<0.74	5	0.5
Toluene	0.74J	19.1	<0.44	6.2J	<0.69	<0.69	<0.44	<0.69	<0.69	<0.44	800	160
1,2,4-Trichlorobenzene	<0.98	<0.98	<1.7	NA	<0.98	<0.98	<1.7	<0.98	<0.98	<1.7	70	14
1,2,3-Trichlorobenzene	<1.8	<1.8	<2.7	NA	<1.8	<1.8	<2.7	<1.8	<1.8	<2.7	-	-
1,1,1-Trichloroethane	<0.33	<0.33	<0.84	NA	<0.33	<0.33	<0.84	<0.33	<0.33	<0.84	200	40
1,1,2-Trichloroethane	<0.34	<0.34	<0.48	NA	<0.34	<0.34	<0.48	<0.34	<0.34	<0.48	5	0.5
Trichloroethene	<0.33	<0.33	<0.47	NA	<0.33	<0.33	<0.47	<0.33	<0.33	<0.47	5	0.5
Trichlorofluoromethane	<0.1	<0.71	<0.87	NA	<0.71	<0.71	<0.87	<0.71	<0.71	<0.87	-	-
1,2,4-Trimethylbenzene	3.8J	209.7	<1.6	74	<2.2	<2.2	<1.6	<2.2	<2.2	2.41J	480	96
1,3,5-Trimethylbenzene	<1.4	207.7	<1.5	10.4J	<1.4	<1.4	<1.5	<1.4	<1.4	<1.5	400	30
Vinyl Chloride	<0.18	<0.18	<0.17	NA	<0.18	<0.18	<0.17	<0.18	<0.18	<0.17	0.2	0.02
m&p-Xylene	13.4	271	<2.2	122	<0.69	<0.69	3.4J	<0.69	<0.69	<2.2	-	-
o-Xylene	3.5	73	<0.9	14.1J	<0.63	<0.63	<0.9	<0.63	<0.63	<0.9	-	-
Xylenes, Total	16.9	344	<2.2/<0.9	122/14.1J	<0.69/<0.63	<0.69/<0.63	3.4J/<0.9	<0.69/<0.63	<0.69/<0.63	<2.2/<0.9	2000	400

Notes: All results expressed as µg/L (parts per billion)

ES NR140 Enforcement Standard (Exceedances in bold)

PAL NR140 Preventive Action Limit (Exceedances in *italics*)

J Analyte detected above limit of detection (LOD) and below limit of quantitation (LOQ)

ES/PAL not established for this compound

Compound not detected at or above LOD

Compound not analyzed

-

<

NA

A.2. Soil Analytical Results Table(s) City Wide Insulation Company, Inc.2159 S. 116th Street, West Allis, Wisconsin 53227

Sample Date		January 31, 2014								RCL			
Sample Identification	GP-1	GP-1	GP-2	GP-2	GP-3	GP-3	GP-4	GP-4	GP-5	GP-5	GWP	NIDC	IDC
Sample Depth	3'-3.5'	11.5'-12'	3'-3.5'	8'-9'	3'-4'	9'-10'	3'-3.5'	9'-10'	3'-3.5'	8'-9'			
Gasoline Range Organics (GRO) (mg/kg)	2610	<11.6	<11.8	<11.5	281	<11.5	<12.1	<11.6	<11.7	<11.6	-	-	-
Petroleum Volatile Organic Compounds	(PVOC) and	d Naphthaler	ne (Method: I	PUBL-FW-14	0)		-	-				-	-
Benzene	<1170	<25	<25	<25	430J	<25	<25	<25	<25	<25	5.1	1600	7070
Ethylbenzene	50700	<25	<25	<25	3960	<25	<25	<25	<25	<25	1570	8020	35400
Methyl tert-butyl ether (MTBE)	<950	<25	<25	<25	<95	<25	<25	<25	<25	<25	27	63800	282000
Naphthalene	43100	<54.5	<25	<25	3970	<25	<25	<25	<25	<25	658.2	5520	24100
Toluene	30500	<25	<25	<25	200J	<25	<25	<25	<25	<25	1107.2	818000	818000
1,2,4-Trimethylbenzene	310000	<28.5	<28.5	<28.5	12400	<28.5	<28.5	<28.5	<28.5	<28.5	-	89800	219000
1,3,5-Trimethylbenzene	96900	<27.4	<27.4	<27.4	3270	<27.4	<27.4	<27.4	<27.4	<27.4	-	182000	182000
Trimethylbenzenes, Total	406900	<28.5/<27.4	<28.5/<27.4	<28.5/<27.4	15670	<28.5/<27.4	<28.5/<27.4	<28.5/<27.4	<28.5/<27.4	<28.5/<27.4	1382.1	-	-
m,p-Xylene	297000	<50	<50	<50	3120	<50	<50	<50	<50	<50	-	778000	778000
o-Xylene	114000	<25	<25	<25	5480	<25	<25	<25	<25	<25	-	434000	434000
Xylenes, Total	411000	<75	<75	<75	8600	<75	<75	<75	<75	<75	3940	260000	260000
<u></u>	-	7	-	•		-	-	-	-			-	-
Cumulative Hazard Index	1 0700	Ο	0	0	0.0000	0	0	0	0	0			

Cumulative Hazard Index	1.8798	0	0	0	0.0808	0	0	0	0	0
Cumulative Cancer Risk	1.4 E-05	0	0	0	1.5E-6	0	0	0	0	0

Notes: All samples collected from the unsaturated zone

All results expressed as µg/kg unless otherwise noted

RCL Residual Contaminant Level (Established December 2012 and revised May 2017)

GWP Groundwater Pathway RCL (Exceedances in **bold**)

NIDC Non-Industrial Direct Contact RCL (Exceedances in **bold**)

IDC Industrial Direct Contact RCL (Exceedances in **bold**)

- RCL not established for this compound

J Analyte detected above limit of detection (LOD) and below limit of quantitation (LOQ)

< Compound not detected at or above the LOD

A.2. Soil Analytical Results Table(s) City Wide Insulation Company, Inc.2159 S. 116th Street, West Allis, Wisconsin 53227

Sample Date			July 30), 2014			RCL		
Sample Identification	GP-6	GP-6	GP-7	GP-7	GP-8	GP-8	GWP	NIDC	IDC
Sample Depth	3'-4'	8'-9'	3.5'-4'	7'-8'	2'-3'	7'-8'	GWP		IDC
Gasoline Range Organics (GRO) (mg/kg)	<3.25	<3.12	10.4	<3.12	<3.12	<3.12	-	-	-
Petroleum Volatile Organic Compounds	(PVOC) and	Naphthalene	(Method: PUI	3L-FW-140)					
Benzene	<24.4	<23.4	<23.4	<23.4	<23.4	<23.4	5.1	1600	7070
Ethylbenzene	<13.2	<12.7	<12.7	<12.7	<12.7	<12.7	1570	8020	35400
Methyl tert-butyl ether (MTBE)	<19.8	<19.0	<19.0	<19.0	<19.0	<19.0	27	63800	282000
Naphthalene	<11.4	<10.9	<10.9	<10.9	<10.9	<10.9	658.2	5520	24100
Toluene	<21.7	<20.8	<20.8	<20.8	<20.8	<20.8	1107.2	818000	818000
1,2,4-Trimethylbenzene	<29.7	<28.5	<28.5	<28.5	<28.5	<28.5	-	89800	219000
1,3,5-Trimethylbenzene	<28.6	<27.4	<27.4	<27.4	<27.4	<27.4	-	182000	182000
Trimethylbenzenes, Total	<29.7/<28.6	<29.7/<28.6	<29.7/<28.6	<29.7/<28.6	<29.7/<28.6	<29.7/<28.6	1382.1	-	-
m,p-Xylene	<32.0	<30.7	<30.7	<30.7	<30.7	<30.7	-	778000	778000
o-Xylene	<15.7	<15.1	<15.1	<15.1	<15.1	<15.1	-	434000	434000
Xylenes, Total	<47.6	<45.7	<45.7	<45.7	<45.7	<45.7	3940	260000	260000

Cumulative Hazard Index	0	0	0	0	0	0
Cumulative Cancer Risk	0	0	0	0	0	0

- Notes: All samples collected from the unsaturated zone
- All results expressed as µg/kg unless otherwise noted
- RCL Residual Contaminant Level (Established December 2012 and revised May 2017)
- GWP Groundwater Pathway RCL (Exceedances in **bold**)
- NIDC Non-Industrial Direct Contact RCL (Exceedances in **bold**)
- IDC Industrial Direct Contact RCL (Exceedances in **bold**)
- RCL not established for this compound
- < Compound not detected at or above the limit of detection

A.2. Soil Analytical Results Table(s)City Wide Insulation Company, Inc.2159 S. 116th Street, West Allis, Wisconsin 53227

Sample Date		March	8, 2017			RCL	
Sample Identification	GP-9	GP-9	GP-10	GP-10	GWP	NIDC	IDC
Sample Depth	3'-4'	9'-10'	3'-4'	7'-8'	GWP	NIDC	IDC
Petroleum Volatile Organic Compounds	(PVOC) and Na	phthalene (Met	hod: PUBL-FW-	140)			
Benzene	<0.025	<0.025	<0.025	<0.025	0.0051	1.6	7.07
Ethylbenzene	<0.025	<0.025	<0.025	<0.025	1.57	8.02	35.4
Methyl tert-butyl ether	<0.025	<0.025	<0.025	<0.025	0.027	63.8	282
Naphthalene	< 0.025	<0.025	<0.025	<0.025	0.6582	5.52	24.1
Toluene	<0.025	<0.025	< 0.025	<0.025	1.1072	818	818
1,2,4-Trimethylbenzene	0.034	<0.025	<0.025	<0.025	-	89.8	219
1,3,5-Trimethylbenzene	0.0251J	<0.025	<0.025	<0.025	-	182	182
Trimethylbenzenes, Total	0.034/0.0251J	<0.025/<0.025	<0.025/<0.025	<0.025/<0.025	1.3821	-	-
m,p-Xylene	< 0.05	< 0.05	< 0.05	< 0.05	-	778	778
o-Xylene	<0.025	<0.025	< 0.025	<0.025	-	434	434
Xylenes, Total	<0.05/<0.025	<0.05/<0.025	<0.05/<0.025	<0.05/<0.025	3.94	260	260

Cumulative Hazard Index	0.0002	0	0	0
Cumulative Cancer Risk	0	0	0	0

Notes:	All samples collected from the unsaturated zone
	All results expressed as mg/kg unless otherwise noted
RCL	Residual Contaminant Level (Established December 2012 and revised May 2017)
GWP	Groundwater Pathway RCL (Exceedances in bold)
NIDC	Non-Industrial Direct Contact RCL (Exceedances in bold)
IDC	Industrial Direct Contact RCL (Exceedances in bold)
-	RCL not established for this compound
J	Analyte detected above limit of detection (LOD) and below limit of quantitation (LOQ)
<	Compound not detected at or above the LOD

A.3. Residual Soil Contamination Table(s) City Wide Insulation Company, Inc. 2159 S. 116th Street, West Allis, Wisconsin 53227

Sample Date					January	31, 2014						RCL	
Sample Identification	GP-1	GP-1	GP-2	GP-2	GP-3	GP-3	GP-4	GP-4	GP-5	GP-5	GWP	NIDC	IDC
Sample Depth	3'-3.5'	11.5'-12'	3'-3.5'	8'-9'	3'-4'	9'-10'	3'-3.5'	9'-10'	3'-3.5'	8'-9'	GWP	NIDC	IDC
Gasoline Range Organics (GRO) (mg/kg)	2610				281						-	-	-
Petroleum Volatile Organic Compounds	(PVOC) and	Naphthalen	e (Method: F	PUBL-FW-14	0)								
Benzene					430J						5.1	1600	7070
Ethylbenzene	50700				3960						1570	8020	35400
Methyl tert-butyl ether (MTBE)											27	63800	282000
Naphthalene	43100				3970						658.2	5520	24100
Toluene	30500										1107.2	818000	818000
1,2,4-Trimethylbenzene	310000										-	89800	219000
1,3,5-Trimethylbenzene											-	182000	182000
Trimethylbenzenes, Total	406900				15670						1382.1	-	-
m,p-Xylene											-	778000	778000
o-Xylene											-	434000	434000
Xylenes, Total	411000				8600						3940	260000	260000

Cumulative Hazard Index	1.8798	0	0	0	0.0808	0	0	0	0	0
Cumulative Cancer Risk	1.4 E-05	0	0	0	1.5E-6	0	0	0	0	0

Notes: All samples collected from the unsaturated zone

All results expressed as µg/kg unless otherwise noted

RCL Residual Contaminant Level (Established December 2012 and revised May 2017)

GWP Groundwater Pathway RCL (Exceedances in **bold**)

NIDC Non-Industrial Direct Contact RCL (Exceedances in **bold**)

IDC Industrial Direct Contact RCL (Exceedances in **bold**)

RCL not established for this compound

-

A.3. Residual Soil Contamination Table(s)City Wide Insulation Company, Inc.2159 S. 116th Street, West Allis, Wisconsin 53227

Sample Date			July 3	0, 2014				RCL	
Sample Identification	GP-6	GP-6	GP-7	GP-7	GP-8	GP-8	GWP	NIDC	IDC
Sample Depth	3'-4'	8'-9'	3.5'-4'	7'-8'	2'-3'	7'-8'	GWP		IDC
Gasoline Range Organics (GRO) (mg/kg)							-	-	-
Petroleum Volatile Organic Compounds	(PVOC) and	Naphthalene	(Method: PU	BL-FW-140)		<u> </u>	-		-
Benzene							5.1	1600	7070
Ethylbenzene							1570	8020	35400
Methyl tert-butyl ether (MTBE)							27	63800	282000
Naphthalene							658.2	5520	24100
Toluene							1107.2	818000	818000
1,2,4-Trimethylbenzene							-	89800	219000
1,3,5-Trimethylbenzene							-	182000	182000
Trimethylbenzenes, Total							1382.1	-	-
m,p-Xylene							-	778000	778000
o-Xylene							-	434000	434000
Xylenes, Total							3940	260000	260000

Cumulative Hazard Index	0	0	0	0	0	0
Cumulative Cancer Risk	0	0	0	0	0	0

Notes: All samples collected from the unsaturated zone

All results expressed as µg/kg unless otherwise noted

RCL Residual Contaminant Level (Established December 2012 and revised May 2017)

- GWP Groundwater Pathway RCL (Exceedances in **bold**)
- NIDC Non-Industrial Direct Contact RCL (Exceedances in **bold**)

IDC Industrial Direct Contact RCL (Exceedances in **bold**)

- RCL not established for this compound

A.3. Residual Soil Contamination Table(s)City Wide Insulation Company, Inc.2159 S. 116th Street, West Allis, Wisconsin 53227

Sample Date		March	8, 2017			RCL	
Sample Identification	GP-9	GP-9	GP-10	GP-10	GWP	NIDC	IDC
Sample Depth	3'-4'	9'-10'	3'-4'	7'-8'	GWP	NIDC	IDC
Petroleum Volatile Organic Com	pounds (PVOC) and Nap	hthalene (Me	thod: PUBL-FW	-140)			
Benzene					0.0051	1.6	7.07
Ethylbenzene					1.57	8.02	35.4
Methyl tert-butyl ether					0.027	63.8	282
Naphthalene					0.6582	5.52	24.1
Toluene					1.1072	818	818
1,2,4-Trimethylbenzene	0.034				-	89.8	219
1,3,5-Trimethylbenzene	0.0251J				-	182	182
Trimethylbenzenes, Total	0.034/0.0251J				1.3821	-	-
m,p-Xylene					-	778	778
o-Xylene					-	434	434
Xylenes, Total					3.94	260	260

Cumulative Hazard Index	0.0002	0	0	0
Cumulative Cancer Risk	0	0	0	0

Notes:	All samples collected from the unsaturated zone
	All results expressed as mg/kg unless otherwise noted
RCL	Residual Contaminant Level (Established December 2012 and revised May 2017)
GWP	Groundwater Pathway RCL (Exceedances in bold)
NIDC	Non-Industrial Direct Contact RCL (Exceedances in bold)
IDC	Industrial Direct Contact RCL (Exceedances in bold)
-	RCL not established for this compound
J	Analyte detected above limit of detection (LOD) and below limit of quantitation (LOQ)
<	Compound not detected at or above the LOD

A.4. Vapor Analytical Table City Wide Insulation Company, Inc. 2159 S. 116th Street Wauwatosa, Wisconsin 53227

Sample Date	03/08/2017	Residential	Small Commercial
Sample Identification	VP-1		
Sample Location	SE Corner	Sub-Slab VRSL	Sub-Slab VRSL
Petroleum Volatile Organic Compound	ds (PVOC) and Naph	thalene (Method: TO	-15)
Benzene	11.7	120	530
Ethylbenzene	13.7	370	1600
Naphthalene	3.1J	28	120
Toluene	490	170000	730000
1,2,4-Trimethylbenzene	16.6	240	1000
1,3,5-Trimethylbenzene	8.3	-	-
m&p-Xylene	44.8	3300	15000
o-Xylene	17	3300	15000

Notes: All results expressed as µg/m³

VRSL Vapor Risk Screening Level (May 2016 Version) Residential Indoor VRSL exceedances in *italics* (AF=0.03) Commercial VRSL exceedances in bold (AF=0.03)

- Sub-slab VRSL not established for this compound

J Analyte detected below limit of quatitation

30 minute collection period (10:49-11:19)

Leak detection: Water Dam - Pass

Communication testing not performed

A.5. Other Media of Concern

Not Applicable

Site investigation did not require the sampling or analysis of sediment, surface water or other media.

A.6. Water Level Elevations City Wide Insulation Company, Inc. 2159 S. 116th Street, West Allis, Wisconsin 53227

				Date Sampled										
Monitoring TOC Well Elevation	TOS	BOS	8/29/2014		11/29/2014		6/9/2015		3/8/2017					
				Depth to Groundwater	Groundwater Elevation									
MW-1	99.26	93.86	83.86	4.16	95.10	4.16	95.10	3.76	95.50	3.4	95.87			
MW-2	97.93	92.43	82.43	5.33	92.60	5.13	92.80	5.03	92.90	-	-			
MW-3	97.99	92.59	82.59	5.29	92.70	5.39	92.60	5.09	92.90	-	-			

Notes All measurements recorded in feet

Benchmark Top of hydrant located in S. 116th Street right-of-way

Top of casing Top of screen TOC

TOS

BOS Bottom of screen

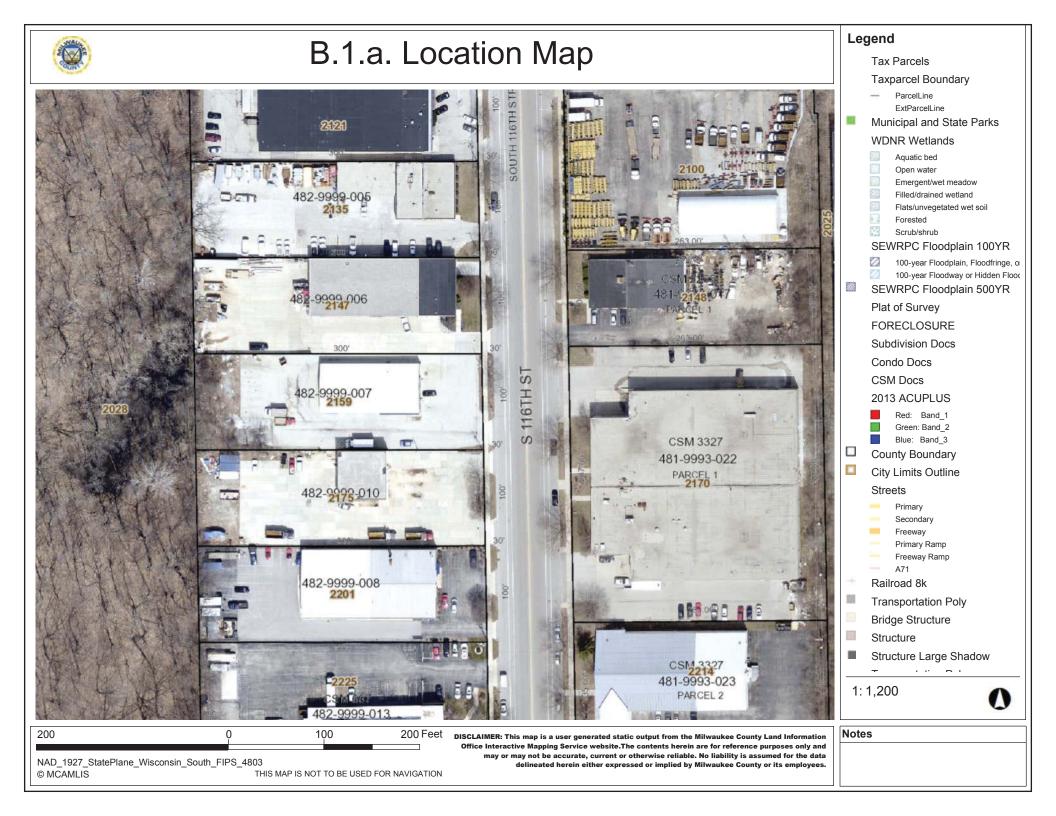
A.7. Other

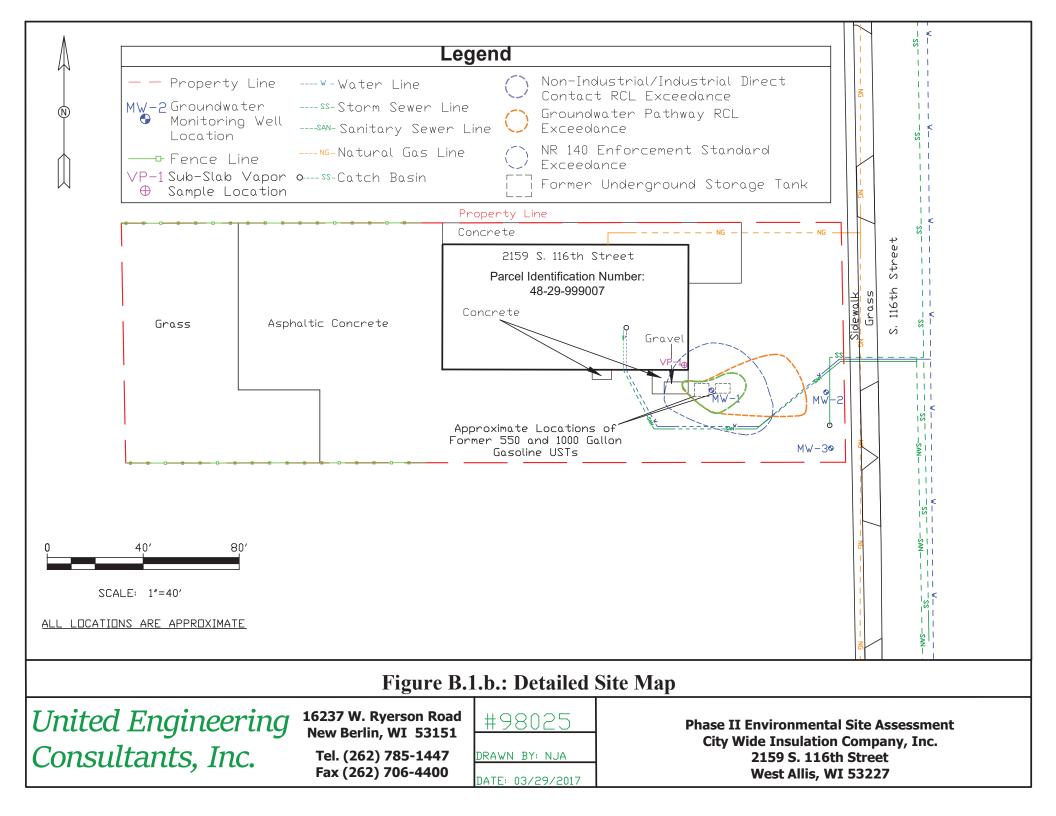
Not Applicable

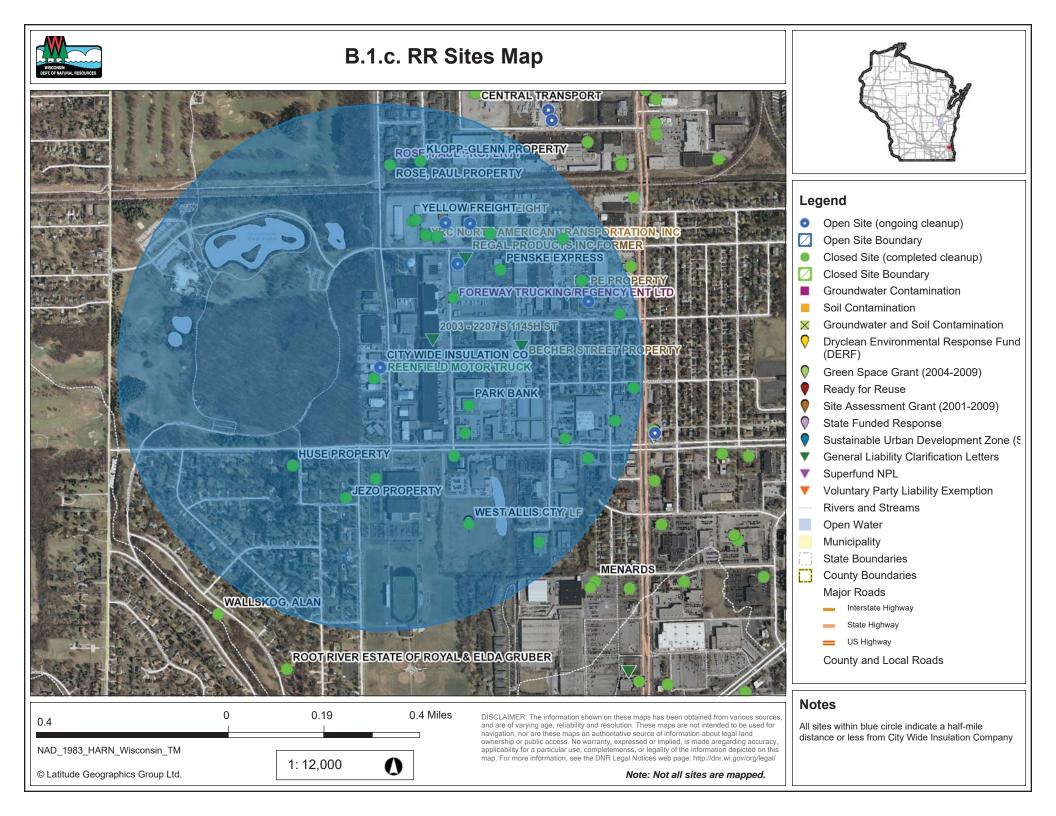
The ES exceedances in the groundwater is limited to Benzene at MW-1 which is located in the approximate center of the former USTs. Although the Benzene concentration has fluctuated from non-detect to 22.6 µg/L since August of 2014 at MW-1, the Benzene plume is relatively stable due to its absence in MW-2 and MW-3 located down gradient to the east-southeast of MW-1. Therefore, natural attenuation will result in the reduction of the Benzene concentration at MW-1 below its ES and PAL in a reasonable period of time.

ATTACHMENT B – Maps, Figures and Photos

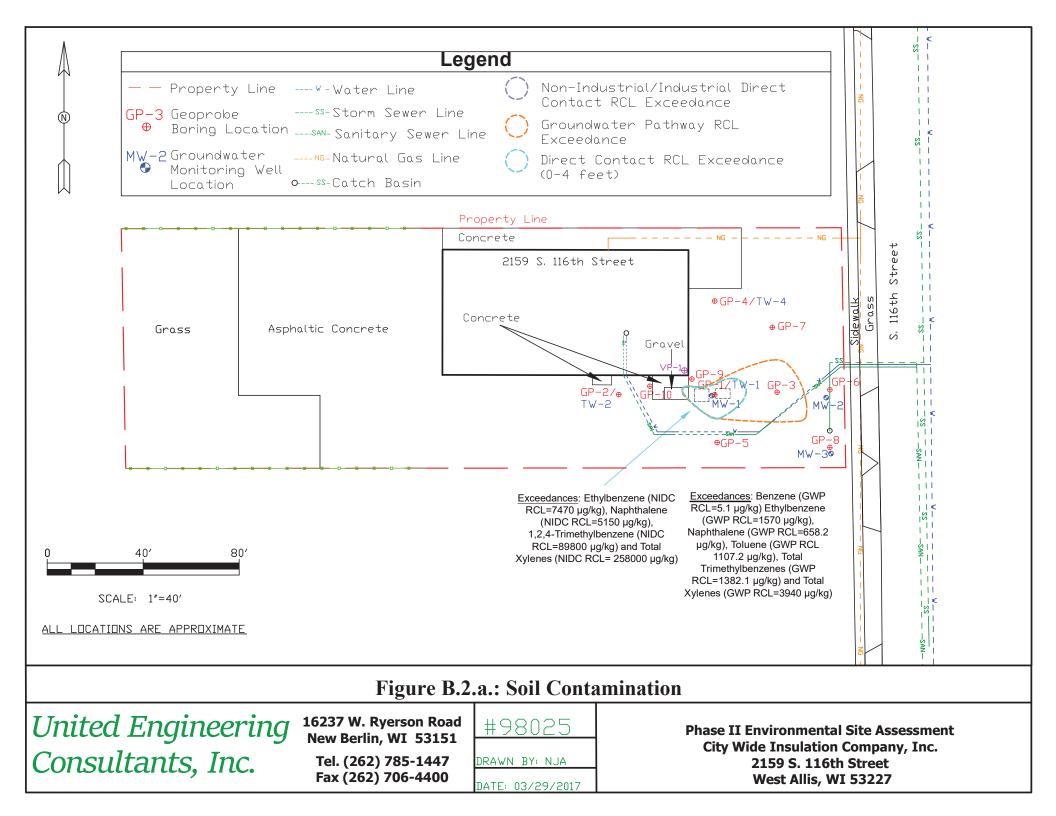
B.1. Location Maps – Applicable B.2. Soil Figures – Applicable B.3. Groundwater Figures – Applicable B.4. – Vapor Maps and Other Media – Applicable B.5. – Structural Impediment Photos – Not Applicable **B.1.** Location Maps

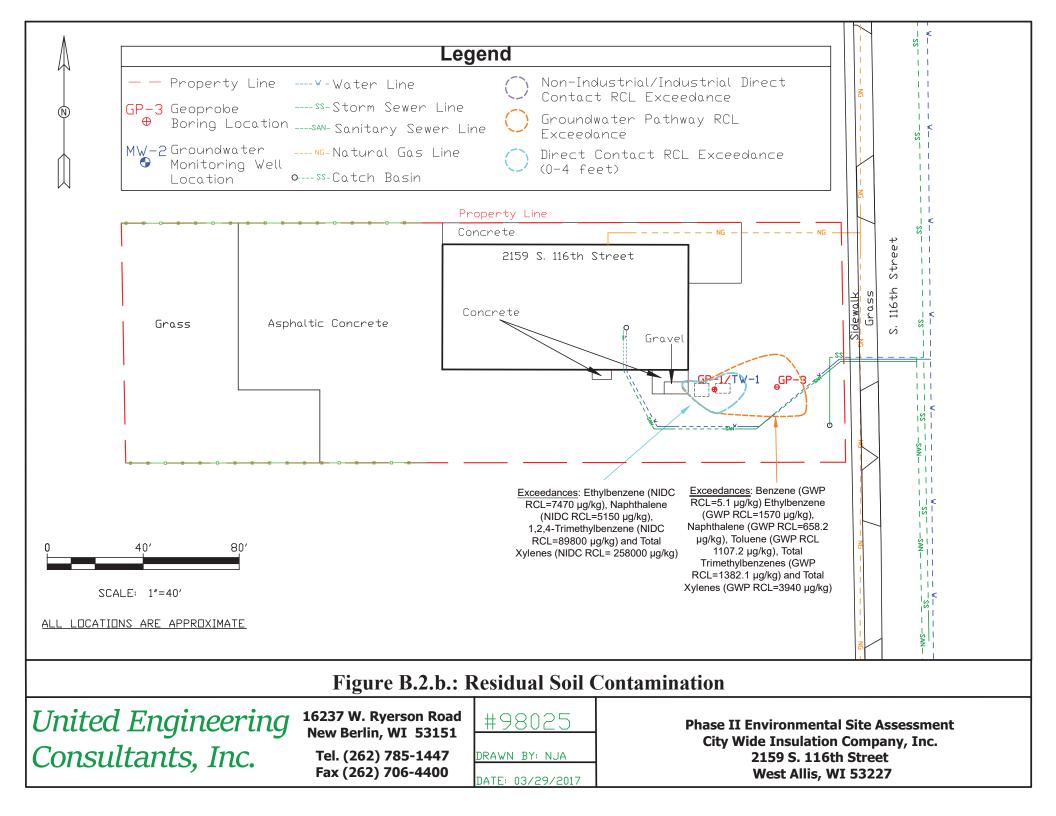




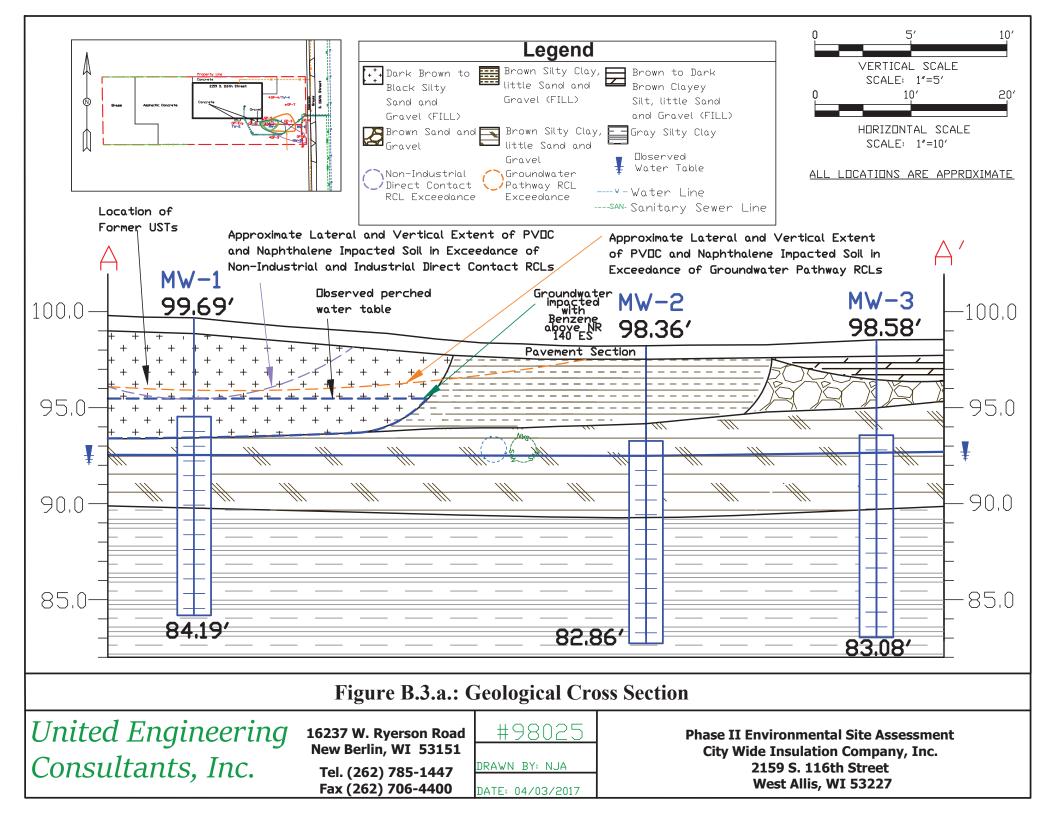


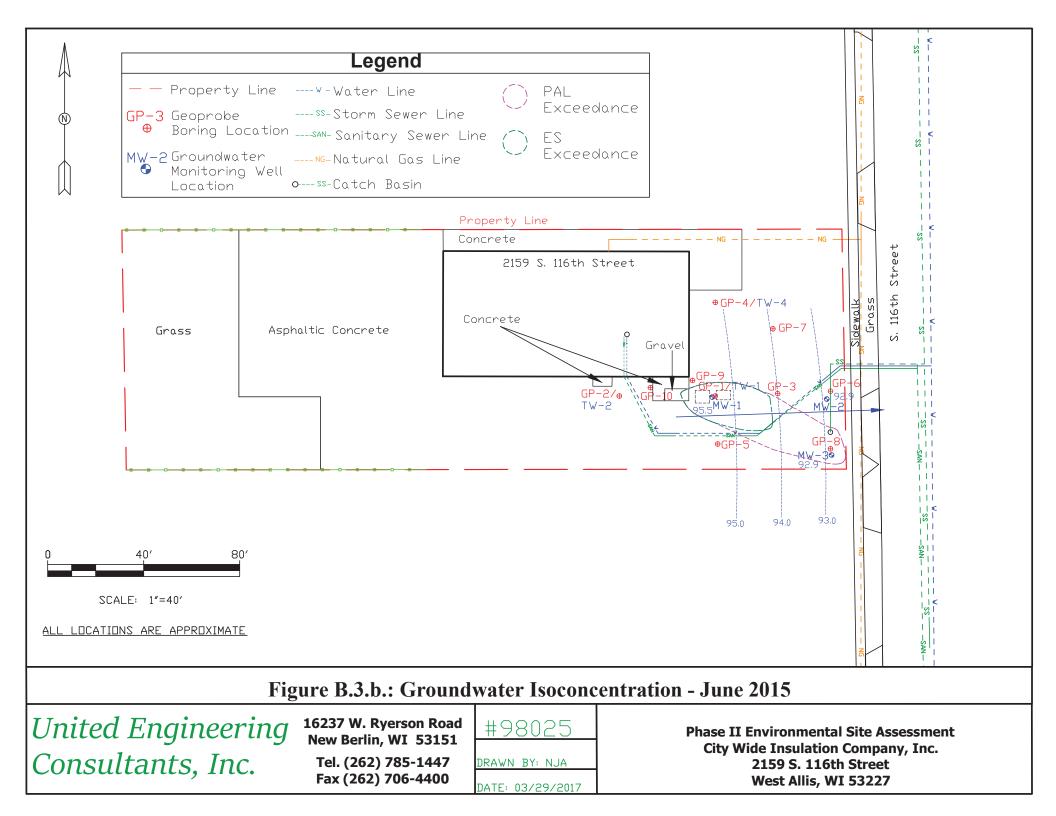
B.2. Soil Figures

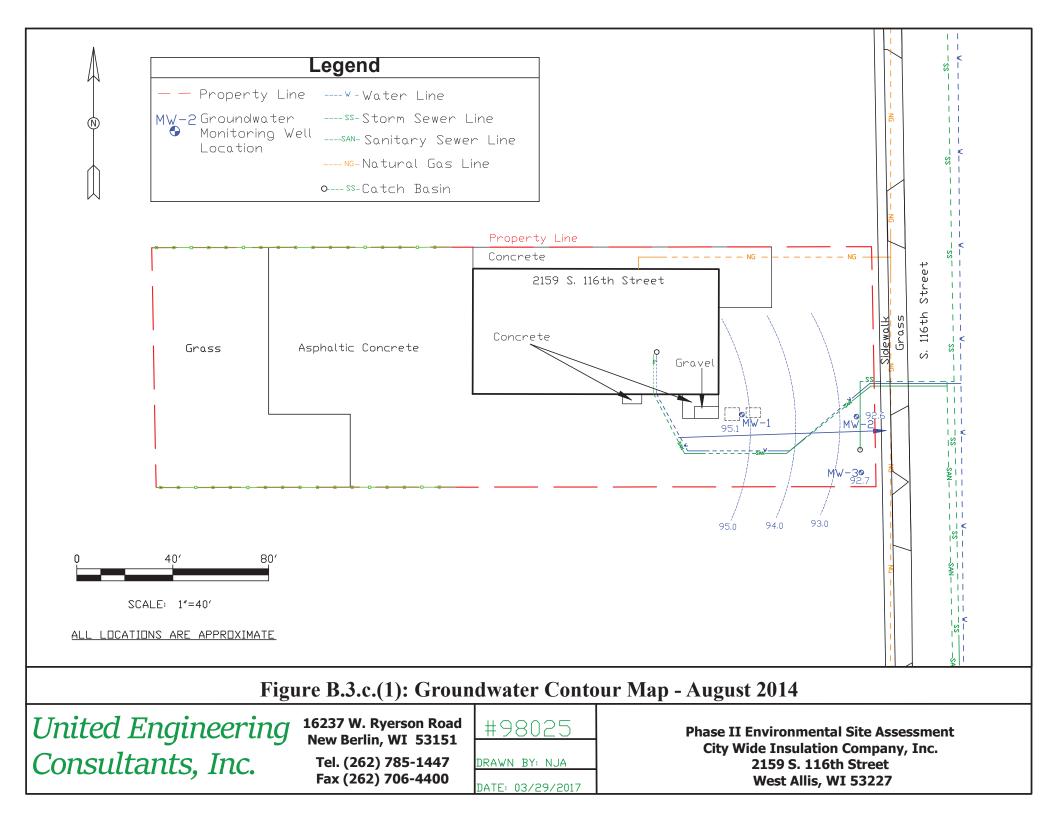


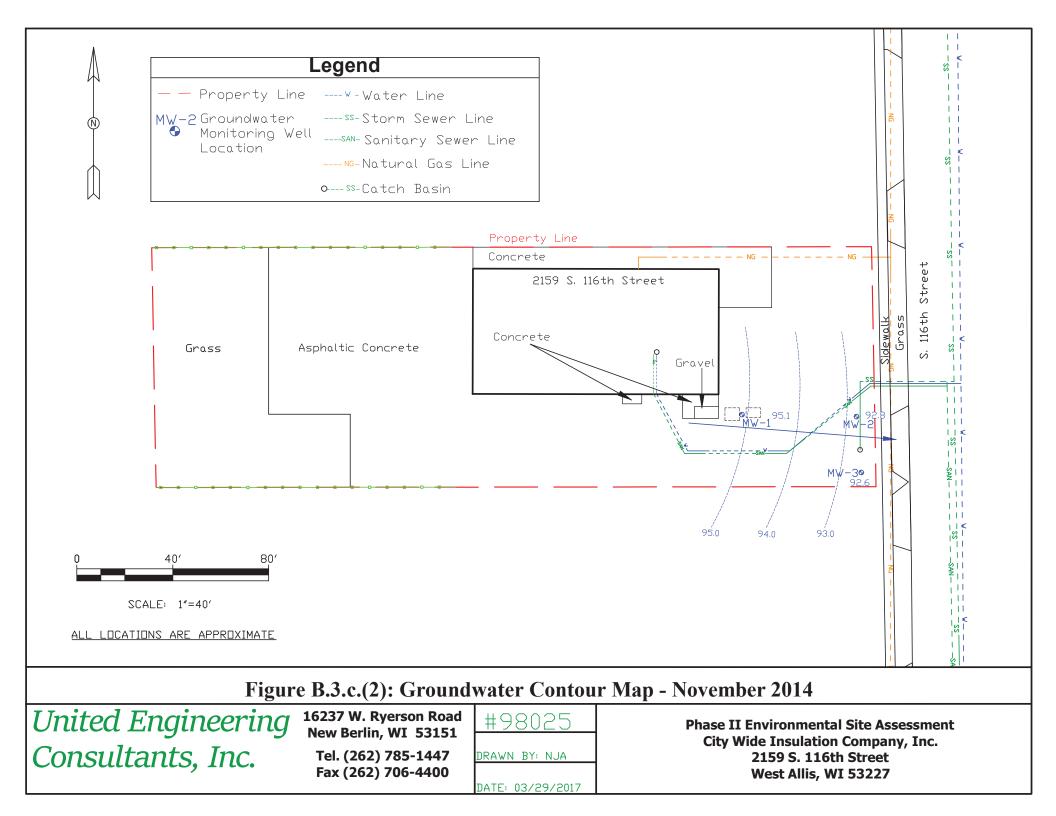


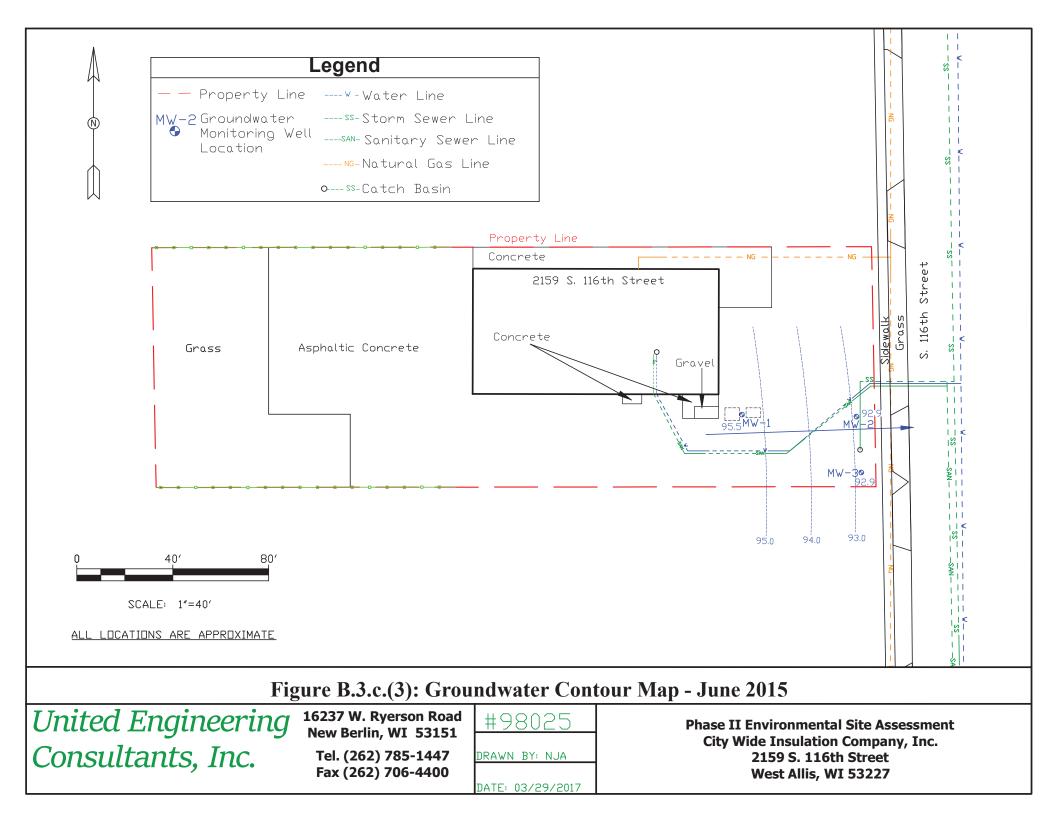
B.3. Groundwater Figures

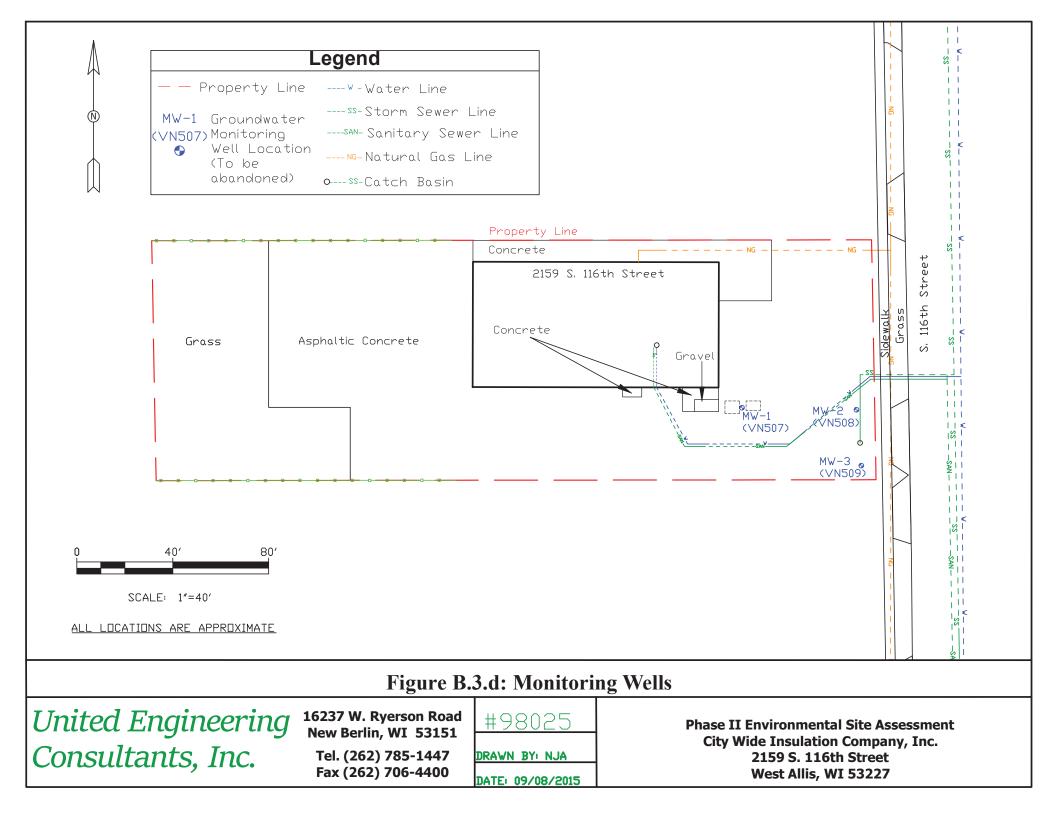




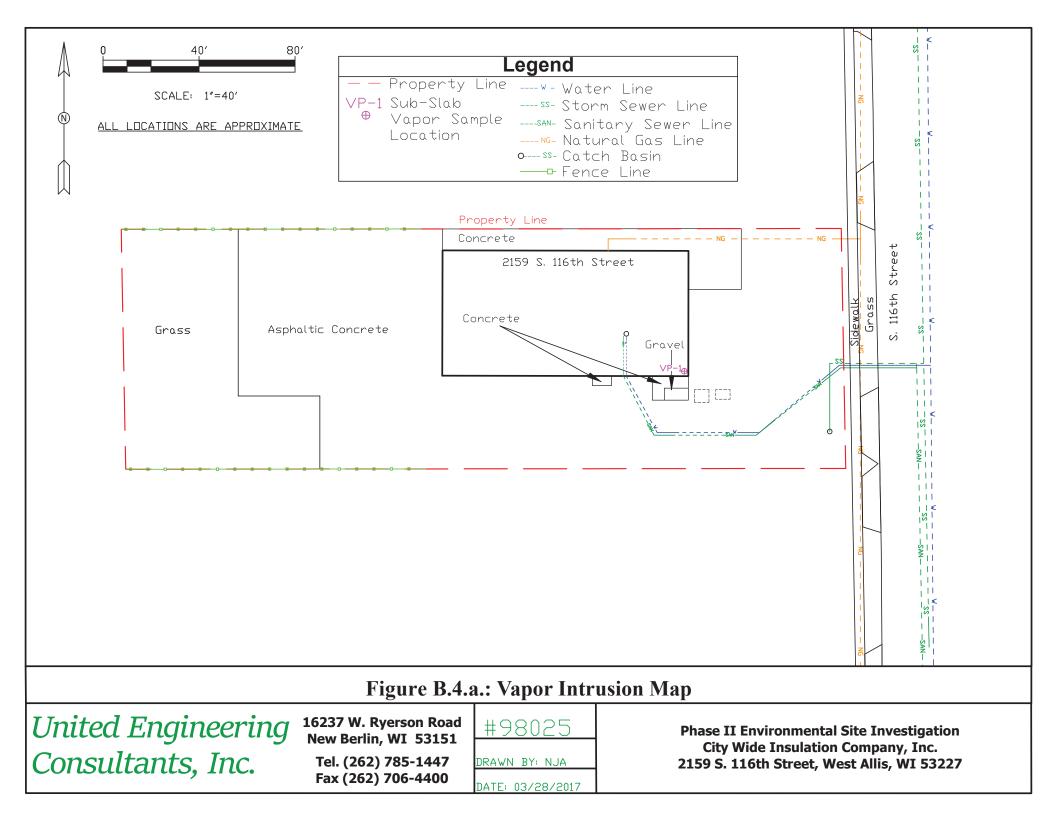








B.4. Vapor Maps and Other Media



B.4.b. Other Media of Concern

Not Applicable

Site investigation did not require the sampling or analysis of sediment or surface water.

B.5. Structural Impediment Photographs

Not Applicable

No structural impediments to a complete site investigation are present at the subject property.

ATTACHMENT C – Documentation of Remedial Action

C.1. Site Investigation Documentation – Applicable C.2. Investigative Waste – Applicable C.3. – Applicable C.4. Construction Documentation – Not Applicable C.5. Decommissioning of Remedial Systems – Not Applicable C.6. Other – Not Applicable

C.1. Site Investigation Documentation

Submitted as Additional Phase II Environmental Site Investigation Activities dated April 12, 2017.

C.2. Investigative Waste Disposal Documentation

leas	se pri	t or type. (Form desig	ned for use on elite (12-pitcl	n) typewriter.)	1	3 -					1 Angles	
î	NO	N-HAZARDOUS	1. Generator ID Number	1 1 14	2. Page 1 of	in the			4. Waste Tra			
1	5. Generator's Name and Mailing Address			0-			300-424-9300 herator's Site Address (if different than			0/7 1 4 2 0		
	5. Generator's Name and Mailing Address City Wide Insulation											
	2159 S. 116th Street											
	West Allis WI 53227 Generator's Phone: 252 785-1447											
	6. Transporter 1 Company Name							U.S. EPA ID N	U.S. EPA ID Number			
	Badger Disposal of WI., Inc.							W 1 D 9 8 8 5 8 0 0 5 6 U.S. EPA ID Number				
	7. Transporter 2 Company Name								U.S. EPAID N	U.S. EPA ID Number		
	8. Designated Facility Name and Site Address								U.S. EPA ID N	lumber		
	Badger Disposal of WI, Inc.											
	5611 West Hemlock Street Milwaukee WI 53223											
	Facility's Phone: 414 760-9175							WID	98	8580056		
	9a. 9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number,					10. Containers			11. Total	12. Unit		
	HM	and Packing Group (if	any))				No.	Туре	Quantity	Wt./Vol.		
2		^{1.} Non-regulate	d material							_	NONE	
GENERATOR						/	202	DM	165	0	1 1	
E		2				U	00	DM	100	G	1	
B		² Non-regulate	ed material				8.0.1		ACT		NONE	
1						0	201	DM	055	G	A STAR HONER	
		3.										
									10			
		4.	-					maria			A Real States	
		A State of the second										
	13. Special Handling Instructions and Additional Information											
	1)(S) WS041080 Soil Cuttings from Site Investigation 2)(L) WS041079 Ground Water Purge Water From Site Investigation											
	Emergency Contact: CHEMTREC #CCN708044											
	14	GENERATOR'S CERTIF	ICATION: I certify the materials	described above on this manif	fest are not sub	biect to federal	regulations fo	or reporting p	roper disposal of I	Hazardous	Waste.	
	Generator's/Offeror's Printed/Typed Name Signature							11 11	11.1	1	Month Day Year	
ł	(X	(X) Nick Anderson 10/1/4/15										
INT'L	15. In	ternational Shipments	Import to U.S.		Export from	n U.S.	Port of en		1.0.0			
-	1. A	sporter signature (for exp					Date leavi	ng U.S.:	1			
TER		16. Transporter Acknowledgment of Receipt of Materials Transporter / Printed/Typed Name Nonth Day Year										
TRANSPORTER	India	porter / Printed/Typed iv	AEL SHEL	HERD		Ignature	U.V	Dul	aley		071414	
NSF	Trans	Transporter 2 Printed/Typed Name Signature Month Day Yea										
TRA												
1	17. Discrepancy											
	17a. I	Discrepancy Indication S	pace Quantity	Туре			Residue		Partial Rej	ection	Full Rejection	
									N STATISTICS			
7	17b. Alternate Facility (or Generator) Manifest Reference Number:								U.S. EPA ID I	Number		
E												
FAC	Facility's Phone:											
B		Signature of Alternate Fa	cility (or Generator)					-			Month Day Year	
NAT												
DESIGNATED FACILITY												
B												
1	18 Designated Facility Owner or Operator: Certification of receipt of materials covered by the manifest except as noted in Item 17a											
	-	18 Designated Facility Owner or Operator: Certification of receipt of materials covered by the manifest except as noted in term 17a Printed/Typed Name Nonth Day Year										
+	1	XIMMETER I SUCH UNDER THE										
6-NHM-C-C-11												
	2					1/		2-D	ESIGNATE	ED FAC	ILITY TO GENERATOR	

C.3.

Utilizing WDNR RCL Spreadsheet on Intranet (v. May 2017)

C.4. Construction Documentation

Not Applicable

No remedial system was installed.

C.5. Decommissioning of Remedial Systems

Not Applicable

No remedial system was installed.

ATTACHMENT D – Maintenance Plan(s) and Photographs

D.1. Descriptions of maintenance action(s) required for maximizing effectiveness of the engineered control, vapor mitigation system, feature or other action for which maintenance is required – Applicable D.2. Location Map(s) – Applicable D.3. Photographs – Applicable D.4. Inspection Log - Applicable

D.1. COVER or BARRIER MAINTENANCE PLAN

August 7, 2017

City Wide Insulation Company Inc. 2159 S. 116th Street West Allis, Wisconsin 53227 BRRTS# 03-41-182126 Parcel ID No. 482-9999-007

Introduction

This document is the Maintenance Plan for an impermeable cap at the above-referenced property in accordance with the requirements of s. NR 724.13 (2), Wis. Adm. Code. The maintenance activities relate to the existing asphaltic concrete, concrete and gravel which occupies the area over the contaminated soil plume.

More site-specific information about this property may be found in:

- The case file in the DNR Southeast Region office located at 2300 N. Dr. Martin Luther King Jr. Drive Milwaukee, Wisconsin 53212
- <u>BRRTS on the Web</u> for the link to a PDF for site-specific information at the time of closure and on continuing obligations;
- <u>RR Sites Map/GIS Registry layer</u> for a map view of the site
- Mr. Riley Neumann, the DNR project manager.

Description of Contamination

Ethylbenzene, Naphthalene, 1,2,4-Trimethylbenzene and total Xylenes are present in the soil at concentrations which exceed their Industrial and Non-Industrial Direct Contact RCLs at approximate depths ranging from three (3) to three and one-half (3 ½) feet in the area of the former USTs. Ethylbenzene, Naphthalene, total Trimethylbenzenes and Xylenes are present in the soil at approximate depths ranging from three (3) to four (4) feet at concentrations which exceed their Groundwater Pathway RCLs in the area of the former USTs and extending to the east approximately thirty (30) feet. Toluene is also present in exceedance of its Groundwater Pathway RCL at the above referenced depths in the area of the former USTs. In addition, Benzene is present in exceedance of its Groundwater Pathway RCL at the above referenced depths approximately thirty (30) feet east of the former USTs. The lateral extent of the soil contamination is indicated on attached figure D.2. Impermeable Barrier Cap for Industrial/Non-Industrial Direct Contact and Groundwater Pathway RCL Exceedances.

Description of the Impermeable Cap to be Maintained

The impermeable cap consists of several inches of compacted gravel or approximately three (3) inches of asphaltic concrete or four (4) inches of concrete underlain by about six (6) inches of granular base course. The impermeable cap is located above the entire lateral extent of the PVOC contaminated soil which exceeds the Groundwater Pathway RCLs and the Industrial and Non-Industrial Direct Contact RCLs within four (4) feet of the ground surface.

Impermeable Cap Purpose

The impermeable cap over the PVOC contaminated soil will serve as a barrier to prevent direct human contact with residual soil contamination which might otherwise pose a threat to human health. The cover/barrier also acts as a partial infiltration barrier to minimize future soil-togroundwater contamination migration which would violate the groundwater standards in ch. NR 140, Wisconsin Administrative Code. Based on the current commercial zoning and use of the property, the barrier should function as intended unless disturbed.

Annual Inspection

The impermeable cap overlying the PVOC contaminated soil as depicted in Figure D.2 will be inspected once a year, normally in the spring after all snow and ice has melted, for deterioration, cracks and other potential problems which can cause additional infiltration into or exposure to underlying soils. The inspections will be performed by the property owner or their designated representative. The inspections will be performed to evaluate damage due to settling, exposure to the weather, wear from traffic, increasing age and other factors. Any area where soils have become or are likely to become exposed and where infiltration from the surface will not be effectively minimized will be documented.

A log of the inspections and any repairs will be maintained by the property owner and is included as D.4, Form 4400-305, Continuing Obligations Inspection and Maintenance Log. The log will include recommendations for necessary repair of any areas where underlying soils are exposed and where infiltration from the surface will not be effectively minimized. Once repairs are completed, they will be documented in the inspection log. A copy of the maintenance plan and inspection log will be kept at the site and will be available for submittal or inspection by Wisconsin Department of Natural Resources (DNR) representatives upon their request.

Maintenance Activities

If problems are noted during the annual inspections or at any other time during the year, repairs will be scheduled as soon as practical. Repairs can include patching and filling or larger resurfacing or construction operations. In the event that necessary maintenance activities expose the underlying soil, the owner must inform maintenance workers of the direct contact exposure hazard and provide them with appropriate personal protection equipment (PPE). The owner must also sample any soil that is excavated from the site prior to disposal to ascertain if contamination remains. The soil must be treated, stored and disposed of by the owner in accordance with applicable local, state and federal law.

In the event the asphaltic concrete, concrete or gravel overlying the PVOC contaminated soil is removed or replaced, the replacement barrier must be equally impervious. Any replacement barrier will be subject to the same maintenance and inspection guidelines as outlined in this Maintenance Plan unless indicated otherwise by the DNR or its successor.

The property owner, in order to maintain the integrity of the impermeable cap, will maintain a copy of this Maintenance Plan at the site and will make it available to all interested parties (i.e. on-site employees, contractors, future property owners, etc.) for viewing.

Prohibition of Activities and Notification of DNR Prior to Actions Affecting a Cover/Barrier

The following activities are prohibited on any portion of the property where concrete or engineered soil cap is required as shown on the attached map, unless prior written approval has been obtained from the Wisconsin Department of Natural Resources: 1) removal of the existing barrier; 2) replacement with another barrier; 3) excavating or grading of the land surface; 4) filling on capped or paved areas; 5) plowing for agricultural cultivation; 6) construction or placement of a building or other structure; 7) changing the use or occupancy of the property to a residential exposure setting, which may include certain uses, such as single or multiple family residences, a school, day care, senior center, hospital, or similar residential exposure settings.

If removal, replacement or other changes to a cover, or a building which is acting as a cover, are considered, the property owner will contact DNR at least 45 days before taking such an action, to determine whether further action may be necessary to protect human health, safety, or welfare or the environment, in accordance with s. NR 727.07, Wis. Adm. Code.

Amendment or Withdrawal of Maintenance Plan

This Maintenance Plan can be amended or withdrawn by the property owner and its successors with the written approval of DNR.

August 2017

Site Owner and Operator: Mr. Patrick Murphy

Mr. Patrick Murphy 11500 W. Orchard Court West Allis, WI 53214 (414) 543-7300

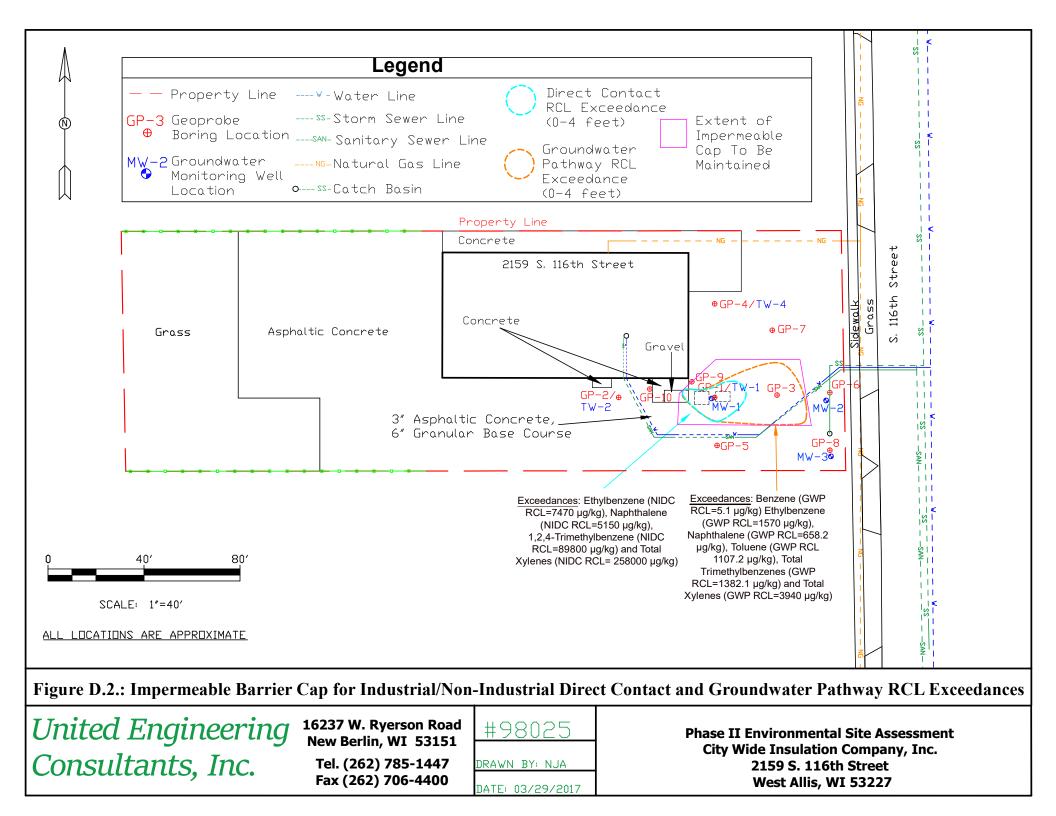
Signature:

Patrick Murfag

Consultant:

Timothy J. Anderson United Engineering Consultants, Inc. 16237 W. Ryerson Road New Berlin, Wisconsin 53151 (262) 785-1447

DNR: Riley Neumann Wisconsin Department of Natural Resources Remediation and Redevelopment Program 2300 N. Dr. Martin Luther King Jr. Drive Milwaukee, Wisconsin 53212 (414) 263-8699



D.3. Photographs – January 2016

City Wide Insulation Company, Inc. 2159 S. 116th Street West Allis, Wisconsin 53227



WESTERN PORTION OF THE IMPERMEABLE CAP LOOKING SOUTHEAST



EASTERN PORTION OF THE IMPERMEABLE CAP LOOKING NORTHEAST



NORTHERN PORTION OF THE IMPERMEABLE CAP LOOKING SOUTH

D.4. Inspection Log

Continuing Obligations Inspection and Maintenance Log

Form 4400-305 (2/14)

Page 1 of 2

Directions: In accordance with s. NR 727.05 (1) (b) 3., Wis. Adm. Code, use of this form for documenting the inspections and maintenance of certain continuing obligations is required. Personal information collected will be used for administrative purposes and may be provided to requesters to the extent required by Wisconsin's Open Records law [ss. 19.31-19.39, Wis. Stats.]. When using this form, identify the condition that is being inspected. See the closure approval letter for this site for requirements regarding the submittal of this form to the Department of Natural Resources. A copy of this inspection log is required to be maintained either on the property, or at a location specified in the closure approval letter. Do NOT delete previous inspection results. This form was developed to provide a continuous history of site inspection results. The Department of Natural Resources project manager is identified in the closure letter. The project manager may also be identified from the database, BRRTS on the Web, at http://dnr.wi.gov/botw/SetUpBasicSearchForm.do, by searching for the site using the BRRTS ID number, and then looking in the "Who" section.

Activity (Site	e) Name			BRRTS No.			
City Wide	Insulation Comp	any		03-41-182126			
Inspections are required to be conducted (see closure approval letter):				When submittal of this form is required, submit the form electronically to the DNR project manager. An electronic version of this filled out form, or a scanned version may be sent to the following email address (see closure approval letter):			
Inspection Date	Inspector Name	Item	Describe the condition of the item that is being inspected	Recommendations for repair or mainte	Previous recommendations implemented?	Photographs taken and attached?	
	Patrick Murphy	monitoring well cover/barrier vapor mitigation system other:			O Y O N	OYON	
	Patrick Murphy	monitoring well cover/barrier vapor mitigation system other:			O Y O N	OYON	
	Patrick Murphy	monitoring well cover/barrier vapor mitigation system other:			O Y O N	OYON	
	Patrick Murphy	monitoring well cover/barrier vapor mitigation system other:			O Y O N	OYON	
	Patrick Murphy	monitoring well cover/barrier vapor mitigation system other:			O Y O N	OYON	
	Patrick Murphy	monitoring well cover/barrier vapor mitigation system other:			O Y O N	OYON	

03-41-182126 BRRTS No.	City Wide Insulati Activity (Site) Nam		Continuing Obligations Inspection and Maintenance Form 4400-305 (2/14) Page			
{Click to Add/E	Edit Image}	Date added:	{Click to Add/Edit	Image} Date added:		
Title:			Title:			

ATTACHMENT E – Monitoring Well Information

Not Applicable

All monitoring wells have been located and will be properly abandoned upon the DNR granting conditional closure to the site.

ATTACHMENT F – Source Legal Documents

F.1. Deed – Applicable F.2. Certified Survey Map – Not Applicable F.3. Verification of Zoning – Applicable F.4. Signed Statement – Applicable F.1. Deed

4	WARRANTY DEED-By Corporation	DEED.4ULDLA.PAGECG			
=		Section 235.16 Wisconsin Statutes			
	. This Indenture, Made this 10th day of Februa	A. D., 19 60			
	between 'I. P. Murphy, Inc.				
	a Corporation duly organized and existing under and by virtue of the laws of th	he State of Wisconsin, located at			
	West Allis. Wisconsin, party of the first part, and				
	City Wide Insulation, Inc.				
	GO .	part.y of the second part.			
	Witnesseth, That the said party of the first part, for and in One Dollar and other good and valuable consideration	consideration of the sum of			

Resolution Ree Val 40 52 p.

AN25 -222

and get the good

i ens

That part of the East 20 acres of the South West One-quarter $(\frac{1}{4})$ of Section numbered Six (6), in Township numbered Six (6) North, Range numbered Twenty-one (21) East, in the City of West Allis, County of Milwaukee and State of Wisconsin, bounded and described as follows: Commencing at a point in the East line of said $\frac{1}{4}$ Section, 1760 feet South of the North East corner thereof; running thence West on a line 1760 feet South of and parallel with the North line of said $\frac{1}{4}$ Section to a point in the West line of said East 20 acres; thence South along the West line of said East 20 acres, 100 feet to a point; thence East on a line 1860 feet South of and parallel with the North line of said $\frac{1}{4}$ Section to a point in the East line of said $\frac{1}{4}$ Section; thence North along the East line of said $\frac{1}{4}$ Section, 100 feet to the place of commencement, reserving the East 30 feet for Street purposes.

for Street purposes. The West 25 feet shall be used as a temporary access road until the street on the East of the said East 20 acres is accessible from West Lincoln Ave, to a point approximately 1350 feet North of West Lincoln Ave.



Together with all and singular the hereditaments and appurtenances thereunto belonging or in any wise appertaining; and all the estate, right, title, interest, claim or demand whatsoever, of the said party of the first part, either in law or equity, either in possession or expectancy of, in and to the above bargained premises, and their hereditaments and appurtenances.

J. P. Murphy Inc. In Witness Whereof, the said, its Secretary, Murphy Inc. SIGNED AND SEALED IN PRESENCE OF (21. John P. Helen Mirohy Rich Edward S. Dropp Drawn by J. P. Murphy. NOTE -- The names of the parties to this instrument and of the witnesses and notary must be priore Section 39-51 (1)-(11), Wisconsin Statutes

DEED 4035 PAGE 224 DE MAN Kalapia. x. • State of Wisconsin, Milwaukee .County 4 Personally came before me, this 10 day of **February**, *K*, D., 10,60 John P. Murphy President, and Paul Zamike Secretary of the above named Corporation, to me known to be the persons who executed the foregoing instrument, and to me known to be such President and Secretary of said Corporation, and acknowledged that they executed the foregoing instrument as such officers as the deed of said Corporation, by its pathority. 1/0 Edward Dropp S Notary Public, ... MI aukee dunit My commission expires. ...August. NT OUT City Wide Insulation Co. Inc day of and recorded in 222 Deputy. egister of Deeds. 3808572 Country This Instrument should be immediately upon record to avoid future trouble and lik D. 19 Marranty Need REGISTER'S OFFICE, P. Murphy Inc. N18C on page State of Wisconsin LWAUKE Received for Record this 5 Allla 35. of Dee No Mast 5 Vol. 2 Pren B Kec COLLIN DUALIN 3808572 05.1

F.2. Certified Survey Map

Not Applicable

No certified survey map or recorded plat map was referenced in the legal description of the most recent deed.

F.3. Verification of Zoning

F.4. Signed Statement

January 6, 2016

Mr. Greg Michael Wisconsin Department of Natural Resources Remediation and Redevelopment Program 141 NW Barstow Street Waukesha, Wisconsin 53188

To the best of my knowledge, the legal description on the attached deed is complete and accurate for the property located at 2159 S. 116th Street in West Allis, Wisconsin 53227.

Sincerely,

Patricia Murgley

Patrick Murphy

ATTACHMENT G – Notifications to Owners of Affected Properties

Not Applicable

Soil, groundwater and vapor contamination from subsurface release(s) associated with the two (2) USTs removed from the property on December 23, 1997 does not extend beyond the subject property boundaries.