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

Tony Evers, Governor Preston D. Cole, Secretary Telephone 608-266-2621 Toll Free 1-888-936-7463



December 20, 2019

Jacquelyn Voeks 680 Emerald PT., Building 5, Condo 7 Hollister, MO 65672

Waubeka Development, LLC. c/o Charles Sheridan 2331 Church Street Evanston, IL 60202

KEEP THIS DOCUMENT WITH YOUR PROPERTY RECORDS

SUBJECT: Final Case Closure with Continuing Obligations

Waubeka Mill Inc., W4132 Mill St., Waubeka, WI 53021

BRRTS #: 03-46-183691, FID #: 246147110, PECFA #: 53021-9716-32-A

Dear Ms. Voeks and Mr. Sheridan:

The Department of Natural Resources (DNR) considers the Waubeka Mill Inc. 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. Certain continuing obligations also apply to affected property owners or rights-of-way holders. These are identified within each continuing obligation.

This final closure decision is based on the correspondence and data provided and is issued under chs. NR 726 and 727, Wis. Adm. Code. The DNR reviewed the request for closure on November 26, 2019. The DNR reviewed this environmental remediation case for compliance with state laws and standards to maintain consistency in the closure of these cases. A request for additional information was issued by the DNR on December 2, 2019 via email, and the last documentation that the conditions in that correspondence were met was received on December 11, 2019.

A 300-gallon underground storage tank (UST) used to fuel commercial vehicles was closed and properly abandoned in place in 1998. Both gasoline and diesel were historically stored in the UST. Soil, groundwater and potential vapor petroleum impacts were evaluated. Residual petroleum impacts will be addressed through natural attenuation. 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 Closure Conditions.

- Groundwater contamination is present at or above ch. NR 140, Wis. Adm. Code enforcement standards.
- Residual soil contamination exists that must be properly managed should it be excavated or removed.



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 online at dnr.wi.gov and search "RR-819".

DNR Database

This site will be included on the Bureau for Remediation and Redevelopment Tracking System (BRRTS) on the Web (BOTW) online at dnr.wi.gov and search "BOTW", 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, at dnr.wi.gov and search "RRSM".

The DNR's approval prior to well construction or reconstruction is required in accordance with s. NR 812.09 (4) (w), Wis. Adm. Code. 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 dnr.wi.gov and search "3300-254".

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 maps, can be found as a Portable Document Format (PDF) in BOTW.

Closure Conditions

Compliance with the requirements of this letter is a responsibility to which the current property owner, and any subsequent property owners must adhere. DNR staff will conduct periodic prearranged inspections to ensure that the conditions included in this letter are met. If these requirements are not followed, the DNR may take enforcement action under s. 292.11, Wis. Stats. 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 53212-3128

Residual Groundwater Contamination (ch. NR 140, 812, Wis. Adm. Code)

Groundwater contamination greater than enforcement standards is present both on this contaminated property and off this contaminated property, as shown on Figure B.3.b. Groundwater Isoconcentration, dated August 29, 2017. If you intend to construct a new well, or reconstruct an existing well, you'll need prior DNR approval. Affected property owners and right-of-way holders were notified of the presence of groundwater contamination. This continuing obligation also applies to ROW holders for Mill Street.

Residual Soil Contamination (ch. NR 718, chs. 500 to 536, Wis. Adm. Code or ch. 289, Wis. Stats.) Soil contamination remains on the northwestern quarter of the property near the former tank bed and fuel dispensers as indicated on Figure B.2.b. Residual Soil Contamination, dated August 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 ch. NR 718, Wis. Adm. Code, with prior DNR approval. This continuing obligation also applies to ROW holders for Mill Street.

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.

Other Closure Information

PECFA Reimbursement

Per Wis. Stats. 292.63 (2) (ac), a claim for Petroleum Environmental Cleanup Fund Award (PECFA) reimbursement must be submitted within 180 days of incurring costs, or by June 30, 2020, whichever comes first, or the costs will not be eligible for PECFA reimbursement.

In addition, Wis. Stats. 292.63 (4) (cc) requires that 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, or by June 30, 2020, whichever comes first, or interest costs will not be eligible for PECFA reimbursement.

In Closing

Please be aware that the case may be reopened pursuant to s. NR 727.13, Wis. Adm. Code, 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 s. 292.15, Wis. Stats., 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, Lee Delcore at 920-893-8524, or at Lee.Delcore@wisconsin.gov.

Sincerely,

Michele R. Norman

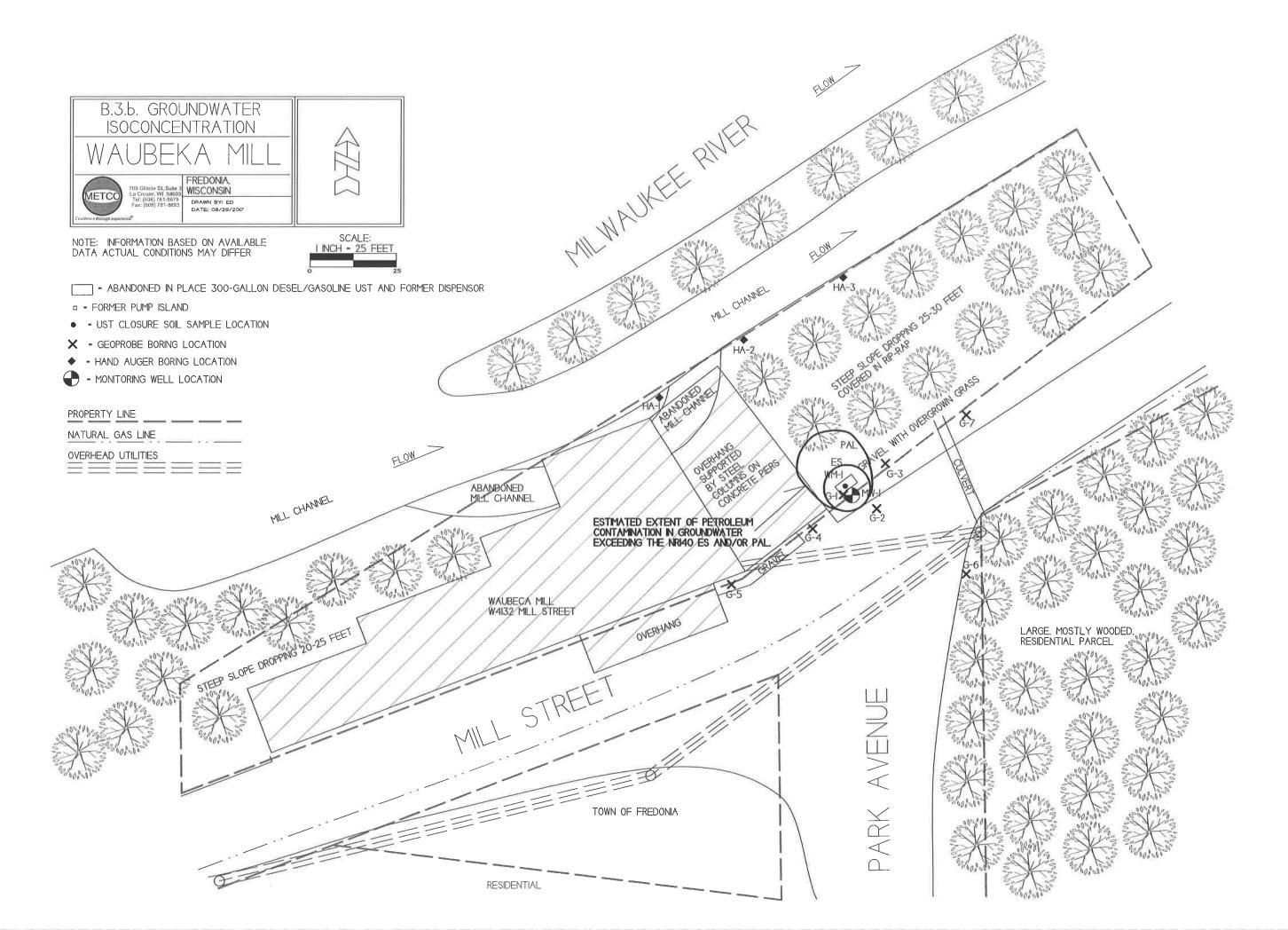
Southeast Region Team Supervisor Remediation & Redevelopment Program

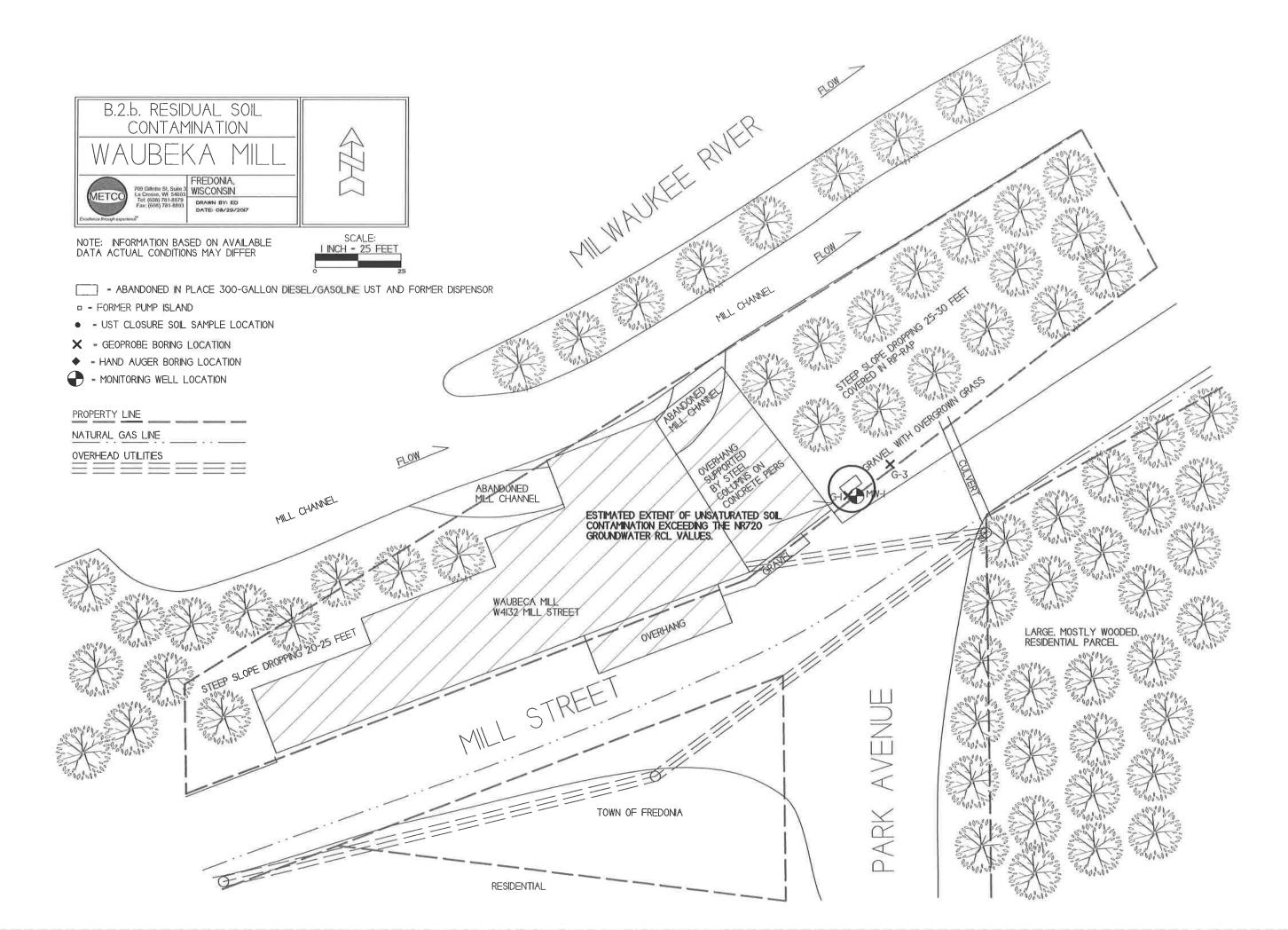
Michele R. Norman

Attachments:

- Figure B.3.b. Groundwater Isoconcentration, dated August 29, 2017
- Figure B.2.b. Residual Soil Contamination, dated August 29, 2017

cc: Ron Anderson, METCO, 709 Gillette St., Suite 3, La Crosse, WI 54603





Case Closure

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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		
BRRTS No.	VPLE No.	
03-46-183691		
Parcel ID No.		
04-028-12-003.00		
FID No.	WTM Coordinates	
246147110	X 682427	335142
BRRTS Activity (Site) Name	WTM Coordinates Represent:	500112
Waubeka Mill Inc.	Source Area Parcel	Center
Site Address	City	State ZIP Code
W4132 Mill Street	Waubeka	WI 53021
Acres Ready For Use	THE COURT	
	.5	
Responsible Party (RP) Name		
Jacquelyn Voeks		
Company Name		
Mailing Address	City	State ZIP Code
680 Emerald PT., Building 5, Condo 7	Hollister	MO 65672
Phone Number	Email	
(262) 707-0735	jvoeks@gmail.com	
Check here if the RP is the owner of the source property.		
Environmental Consultant Name		
Ronald J Anderson		
Consulting Firm		
METCO	lo:	lover Jain Code
Mailing Address	City	State ZIP Code
709 Gillette Street	La Crosse	WI 54603
Phone Number	Email	
(608) 781-8879	rona@metcohq.com	
Fees and Mailing of Closure Request		
 Send a copy of page one of this form and the applicable ch. N (Environmental Program Associate) at http://dnr.wi.gov/topic/ 	R 749, Wis. Adm. Code, fee(s) to the DNR Reg Brownfields/Contact.html#tabx3. Check all f	gional EPA ees that apply:
	\$300 Database Fee for Soil	
\$350 Database Fee for Groundwater or	Total Amount of Payment \$ \$1,700.00	
Monitoring Wells (Not Abandoned)	Resubmittal, Fees Previously Paid	
2 Send one naner conv and one e-conv on compact disk of the	he entire closure nackage to the Regional Pro	niect Manager

Send one paper copy and one e-copy on compact disk of the entire closure package to the Regional Project Manager
assigned to your site. Submit as <u>unbound</u>, <u>separate documents</u> in the order and with the titles prescribed by this form. For
electronic document submittal requirements, see http://dnr.wi.gov/files/PDF/pubs/rr/RR690.pdf.

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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 Waubeka Mill site, W4132 Mill Street, is located at the SE 1/4, SW 1/4, Section 28, Township 12 North, Range 21 East, in Waubeka (Town of Fredonia), Ozaukee County, WI. The site is bound by Mill Street to the south, the Milwaukee River to the north and west, and a residential property to the east.
- B. Prior and current site usage: Specifically describe the current and historic occupancy and types of use.

 A feed mill has operated on the subject property since 1864. A 300-gallon underground storage tank (UST) existed on the east side of the building and was used for fueling company vehicles. The UST was last used for storing diesel fuel and had previously been used for leaded gasoline.
- C. Current zoning (e.g., industrial, commercial, residential) for the site and for neighboring properties, and how verified (Provide documentation in Attachment G).
 - According to the Ozaukee County GIS Map, the Waubeka Mill site is zoned as Commercial. Neighboring properties to the west, south are zoned as Residential. The Neighboring property to the east is zoned as Commercial.
- D. Describe how and when site contamination was discovered.
 - On January 2, 1998, the 300-gallon diesel UST was abandoned in place due to its location on a steep slope and proximity to concrete footings and support beams beneath the building. Cardinal Environmental, Inc. oversaw the abandonment of the UST and conducted a Closure Assessment. After the tank had been cut open and cleaned, a hole was cut in the bottom of the UST and a soil sample was collected from approximately 1 foot below the bottom of the UST for DRO and GRO analysis. The soil analytical results showed 17 ppm DRO and 350 ppm GRO. The petroleum contamination was subsequently reported to the WDNR, who then required that a site investigation be conducted.
- E. Describe the type(s) and source(s) or suspected source(s) of contamination. Petroleum contamination appears to have originated from the former 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. No other BRRTS activities exist at the subject property.
- H. List BRRTS activity/site name(s) and number(s) for all properties immediately adjacent to (abutting) this source property. There are currently no BRRTS cases for any immediately adjacent properties.

2. General Site Conditions

- A. Soil/Geology
 - Describe soil type(s) and relevant physical properties, thickness of soil column across the site, vertical and lateral variations in soil types.
 - Local unconsolidated materials in the area of the investigation generally consist of silt/clay with traces of gravel at depths ranging from 1-2 feet bgs and extending to depths ranging from 14-18 feet bgs.
 - ii. Describe the composition, location and lateral extent, and depth of fill or waste deposits on the site.

 Fill material consisting of sand to silty sand and gravel was encountered in soil borings G-1 thru G-7 from surface to depths ranging from 1-2 feet bgs.
 - iii. Describe the depth to bedrock, bedrock type, competency and whether or not it was encountered during the investigation. Weathered dolomite was encountered at depths ranging from 14-18 feet bgs and extends to at least 21 feet bgs.
 - 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 on-site building is located in the central portion of the property. Mill Street exists to the south and is adjacent to the on-site building. Areas of overgrown grass with a steep slope exist to the north, east, and west of the on site building.
- B. Groundwater

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 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 exists at depths ranging from 9.55 to 10.73 feet bgs in MW-1 depending on the time of year. Free product has not affected watertable elevation measurements in the monitoring well. The stratigraphic unit where the watertable exists consists silt/clay with trace gravel and weathered dolomite. No piezometers were installed during the investigation.

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

Based on the local topography and proximity to the Milwaukee River, local horizontal groundwater flow in the immediate area of the subject property is expected to be towards the north to northwest.

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

On May 7, 2018, METCO conducted slug tests on monitoring well MW-1. The slug test data was evaluated using the curve fitting program "Hydro-Test for Windows" Produced by Dakota Environmental, Inc.

Slug test data was evaluated using the Bouwer and Rice method. Hydrogeologic parameters were estimated as follows:

Monitoring Well MW-1

Hydraulic Conductivity (K) = 1.41e-006 ft/sec

Transmissivity = 1.54e-005 ft2/sec

Since there is only one monitoring well, the hydraulic gradient and flow velocity could not be calculated. Since the thickness of the unconfined aquifer was unknown, the bottom of monitoring well MW-1 was assumed as the lower extent of the aquifer for calculation purposes.

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).

There is no potable water supply to the subject property. The surrounding properties are all served by private water supply wells. All of the properties with private potable wells are over 165 feet away from the source property.

Commercial Property - W4128 Mill Street

The potable well on this property is located approximately 165 feet north of the former UST system. (Well construction unknown)

Residential Property - W4147 Mill Street

The potable well on this property is located approximately 240 feet southwest of the former UST system. (Well construction unknown)

Residential Property - N5363 Cigrand Drive

The potable well on this property is located approximately 300 feet northeast of the former UST system. (Well construction unknown)

Residential Property - N5336 Park Avenue

The potable well on this property is located approximately 360 feet southeast of the former UST system. (Well depth is known to be 160 feet bgs.)

Residential Property - N5329 Park Avenue

The potable well on this property is located approximately 380 feet southwest of the former UST system. (Well construction unknown)

Residential Property - W4171 Mill Street

The potable well on this property is located approximately 530 feet southwest of the former UST system. (Well construction unknown)

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.

On October 2, 2017 METCO completed seven Geoprobe borings (G-1 thru G-7) and three hand auger borings (HA-1, HA-2, and HA-3). Thirty-two soil samples were collected for field (PID) and/or laboratory analysis (PVOC, Naphthalene, PAH, and/or Lead). Eight groundwater samples were collected from the borings for laboratory analysis (PVOC and Naphthalene). Monitoring Well MW-1 was installed in the conducted boring. (Site Investigation Report July 31, 2018)

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On March 16, 2018, METCO completed one soil boring with five soil samples collected for field (PID) and/or laboratory analysis (DRO, GRO, PVOC, Naphthalene, TCLP-Lead, TCLP-Benzene). (Site Investigation Report - July 31, 2018)

On May 7, 2018, METCO personnel collected groundwater samples from monitoring well MW-1 (Round 1) for laboratory analysis (VOC, PAH, Dissolved Lead, Dissolved Iron, Dissolved Manganese, Nitrate/Nitrite, and Sulfate). Field measurements for water level, temperature, pH, ORP, Dissolved Oxygen and Specific Conductance were collected from the sampled monitoring well. METCO also conducted slug tests on the monitoring well (MW-1). (Site Investigation Report - July 31, 2018)

On December 13, 2018, METCO personnel collected groundwater samples from monitoring well MW-1 for laboratory analysis (PVOC and Naphthalene). Field measurements for water level, temperature, pH, ORP, Dissolved Oxygen and Specific Conductance were collected from the sampled monitoring well. A Potable Well Field Reconnaissance was conducted during the groundwater sampling event. (Attatchment C)

On March 12, 2019, METCO personnel collected groundwater samples from monitoring well MW-1 for laboratory analysis (PVOC and Naphthalene). Field measurements for water level, temperature, pH, ORP, Dissolved Oxygen and Specific Conductance were collected from the sampled monitoring well. (Attatchment C)

- 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. Soil and groundwater contamination exists within the right of way of Mill Street.
- 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 interfered with the completion of the site investigation.

B Soil

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

An area of unsaturated soil contamination, which exceeds the NR720 Groundwater RCL values exists in the area of the abandoned in place UST. This soil contamination plume consists of an area encompassing the former UST that is approximately 14 feet in diameter, and up to 9 feet thick.

An area of unsaturated soil contamination, which exceeds the NR720 Groundwater RCL values for Lead only exists in the area of G-3. This soil contamination plume encompasses geoprobe boring G-3 that is approximately 9 feet in diameter, and up to 4 feet thick.

There are no utility lines existing in the area of the soil contaminant plume, thus these do not pose a risk of potential migration pathways.

- Describe the concentration(s) and types of soil contaminants found in the upper four feet of the soil column. Soil samples collected within the upper four feet of the soil column exceeding the NR720 RCL's include:
 - G-1-1 (3.5 feet bgs): Benzene (0.0265 ppm) and Trimethylbenzenes (3.68 ppm). G-3-1 (3.5 feet bgs): Lead (35.1 ppm).
- 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.

The method used to establish the soil cleanup standards for this site were the NR720 RCL's. The property is zoned as B-1 Business, therefore non-industrial standards were used for this site.

C. Groundwater

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.

A dissolved phase contaminant plume exceeding the NR140 ES and or PAL has formed at the water table in the area of the abandoned in place UST and has migrated toward the northwest. This plume is approximately 25 feet long and 20 feet wide.

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This groundwater plume is approximately 165 feet southwest of potable well W4128 Mill Street, 240 feet northwest of potable well W4147 Mill Street, 300 feet southwest of potable well N5363 Cigrand Drive, 360 feet northwest of the potable well at N5336 Park Avenue, and 380 feet northwest of potable well N5329 Park Avenue 530 feet northeast of potable well W4171 Mill Street. Due to the distance and up/side gradient locations of the private water supply wells, they do not appear to be at risk. The nearest municipal wells are in the Village of Fredonia and are located over 1 mile to the east.

There are no utility lines existing in the area of the soil contaminant plume, thus do not pose a risk of potential migration pathways.

The groundwater contamination plume does not appear to intercept any building foundation drain systems.

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 the 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.Soil and groundwater contamination does not appear to extend underneath the building at W4132 Mill Street therefore, the potential of vapor intrusion to the on site building appears unlikely.
- 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).
 No indoor air/sub slab vapor samples were collected.

E. Surface Water and Sediment

- i. Identify whether surface water and/or sediment was assessed and describe the impacts found. If this pathway was not assessed, explain why.
 - The nearest surface water is the Milwaukee River, which exists approximately 50 feet to the northwest of the former UST system. Based on groundwater samples collected from hand auger borings HA-1, HA-2, and HA-3, it does not appear that petroleum contamination in groundwater has migrated to the Milwaukee River.
- 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.
 No surface water or sediment samples were collected.

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 remedial actions occurred at this site.

- B. Describe any immediate or interim actions taken at the site under ch NR 708, Wis. Adm. Code. No immediate or interim actions occurred at this site.
- 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 remedial actions occurred at this 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 evaluation of the Green and Sustainable Remediation was conducted.
- 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.

An area of unsaturated soil contamination, which exceeds the NR720 Groundwater RCL values exists in the area of the abandoned in place UST. This soil contamination plume consists of an area encompassing the former UST that is approximately 14 feet in diameter, and up to 9 feet thick.

An area of unsaturated soil contamination, which exceeds the NR720 Groundwater RCL values for Lead only exists in the area of G-3. This soil contamination plume encompasses geoprobe boring G-3 that is approximately 9 feet in diameter, and

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up to 4 feet thick.

A dissolved phase contaminant plume exceeding the NR140 ES and or PAL has formed at the water table in the area of the abandoned in place UST and has migrated toward the northwest. This plume is approximately 25 feet long and 20 feet wide.

Soil and groundwater contamination exists within the right of way of Mill Street.

- 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.
 - There appears to be no soil contamination within the upper four feet exceeding the NR720 Non-industrial Direct Contact RCL's at this site.
- 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.

Soil samples above the observed low water table which currently exceed the NR720 Groundwater RCL's include:

G-1-1 (3.5 feet bgs): Benzene and Trimethylbenzenes.

G-3-1 (3.5 feet bgs): Lead

MW-1-2 (7 feet bgs): Benzene, Ethylbenzene, Naphthalene, Toluene, Trimethylbenzenes, and Xylene.

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.

Any remaining exposure pathways will be addressed via natural attenuation.

- 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).
 Overall contaminant trends in groundwater appear to be at least stable to decreasing. Since the overall contaminant trends appear to be stable to decreasing, natural attention appears to be effectively reducing the contaminant mass.
- J. Identify how all exposure pathways (soil, groundwater, vapor) were removed and/or adequately addressed by immediate, interim and/or remedial action(s).

Any remaining exposure pathways will be addressed via natural attenuation.

- K. Identify any system hardware anticipated to be left in place after site closure, and explain the reasons why it will remain. No system hardware was installed as part of the site investigation.
- 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.

Monitoring locations that currently exceed the NR140 PAL or ES include the following:

Monitoring Well MW-1: Currently shows an NR140 ES exceedances for Benzene (31 ppb), Ethylbenzene (1100 ppb), Naphthalene (260 ppm), Toluene (1050 ppm), Trimethylbenzenes (1600 ppb), and Xylene (2440 ppb).

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.

No vapor samples were collected as part of the site investigation.

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 surface water and/or sediment samples were collected.

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BRRTS No.

Activity (Site) Name

Continuing Obligations: Includes all affected properties and rights-of-way (ROWs). 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.)

	This situation property of	on applies to t or Right of Wa	he following y (ROW):		Maintenance			
	Property Typ	Case Closure Situation - Continuing Obligation (database fees will apply, ii xiv.)						
	Source Property	Affected Property (Off-Source)	ROW		Required			
i.		\boxtimes		None of the following situations apply to this case closure request.	NA			
ii.	\boxtimes		\boxtimes	Residual groundwater contamination exceeds ch. NR 140 ESs.	NA			
iii.	\boxtimes		\boxtimes	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			
٧.				Cover/Barrier/Engineered Cover or Control for (soil) direct contact pathways (includes vapor barriers)	Yes			
vi.				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)					
viii.				Residual soil contamination meets NR 720 industrial soil RCLs, land use is classified as industrial	NA			
İX.			NA	Vapor Mitigation System (VMS) required due to exceedances of vapor risk screening levels or other health based concern	Yes			
Χ.			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			
	Inderground . Were any or remedi	tanks, piping		ociated tank system components removed as part of the investigation	Yes No			
Е	B. Do any up	graded tanks	meeting the	requirements of ch. ATCP 93, Wis. Adm. Code, exist on the property?	Yes No			
	C. If the ansv	ver to questio	n 6.B. is ves	is the leak detection system currently being monitored?	Yes O No			

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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.
- Summaries of all data must 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)

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 all 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.

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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.

Documentation of Remedial Action (Attachment C)

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.

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BRRTS No. Activity (Site) Name

- 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:

\subset	No n	nonitoring wells were installed as part of this response action.
•	All n	nonitoring wells have been located and will be properly abandoned upon the DNR granting conditional closure to the site
\bigcirc	Sele	ect 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.

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BRRTS No.

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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.

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.

Activity (Site) Name

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N	lotifications to Owners of Affected Properties	(Attachment G	3)			WEST T							SI .				100	-	
									F	Reas	ons	Not	ifica	tion	Lette	er S	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	E	Commercial/Industrial Vapor Exposure	112 .	
А	W4132 Mill Street	04-028-12-00 3.00	07/05/2019	SPO	682427	335142	X	X											
В	Mill Street		07/15/2019	ROWH	682431	335139	X	X											

0.3-	-46-	18	36	191

BRRTS No.

Waubeka Mill Inc.

Activity (Site) Name

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Signatures and Findings for Closure Determination

This page has been updated as of February 2019 to comply with the requirements of Wis. Admin. Code ch. NR 712.

Check the correct box for this case closure request and complete the corresponding certification statement(s) listed below to demonstrate that the requirements of Wis. Admin. Code ch. NR 712 have been met. The responsibility for signing the certification may not be delegated per Wis. Admin. Code § NR 712.09 (1). Per Wis. Admin. Code § 712.05 (1), the work must be conducted or supervised by the person certifying.

- () The investigation and/or response action(s) for this site evaluated and/or addressed groundwater (including natural attenuation remedies). Both a professional engineer and a hydrogeologist must sign this document per Wis. Admin. Code ch. NR 712.
- The investigation and the response action(s) for this site did not evaluate or address groundwater. A professional engineer must sign this document per Wis. Admin. Code ch. NR 712.

Engineering Certification
I, Thomas P. Pignet hereby certify that I am a registered professional engineer in the
State of Wisconsin, registered in accordance with the requirements of ch. A-E 4, Wis. Adm, Code, that this document has been
prepared 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 document is correct and the document was premised in compliance with all applicable requirements in
chs. NR 700 to 726, Wis. Adm. Code.
TO A STATE OF THE
Signature Thomas Penel 33227-006
Signature Thomas Pynt B 33227-006 B 33227-006
BB: 33227.00 14 1
The same of the sa
Title Engineer Wisconsist P.E. Stamp
48/8/8/8
Hydrogeologist Certification
I, Ronald J. Anderson , hereby certify that I am a hydrogeologist as that term is defined in
s. NR 712.03 (1), Wis. Adm. Code, am registered in accordance with the requirements of ch. 6-ISS 2, Wis. Adm. Code, or licensed in
accordance with the requirements of ch. GHSS 3, Wis. Adm. Code, and that, to the best of my knowledge, all of the information contained in this document is correct and the document was prepared in compliance with all applicable requirements in chs. NR 700 to
726, Wis. Adm. Code.
725, 116. Fall. Gods.
f/ H
Signature / Lold 5: / hd
in tack
Title Senior Hydrogeologist/Project Manager Date

Attachment A/Data Tables

- A.1 Groundwater Analytical Tables
- A.2 Soil Analytical Tables
- A.3 Residual Soil Contamination Table
- A.4 Vapor Analytical Table No Vapor Samples Collected
- A.5 Other Media of Concern No surface waters or sediments were assessed as part of the site investigation.
- A.6 Water Level Elevations
- A.7 Other Natural Attenuation Parameters

A.1 Groundwater Analytical Table (Geoprobe)
Waubeka Mill, Inc BRRTS #03-46-183691

Sample			Ethyl		Naph-		Trimethyl-	Xylene
ID	Date	Benzene	Benzene	MTBE	thalene	Toluene	benzenes	(Total)
	3	(ppb)	(ppb)	(ppb)	(ppb)	(ppb)	(ppb)	(ppb)
G-1-W	10/2/2017	5.4	90	<0.43	2.26	4.8	101.5	184
G-2-W	10/2/2017	0.47	<0.56	< 0.43	<1.7	0.38	<1.14	<1.71
G-3-W	10/2/2017	<0.27	0.76	< 0.43	<1.7	< 0.33	<1.14	4.39
G-4-W	10/2/2017	<0.27	<0.56	< 0.43	<1.7	< 0.33	<1.14	<1.71
G-6-W	10/2/2017	<0.27	<0.56	< 0.43	<1.7	< 0.33	<1.14	1.67-2.28
HA-1-W	10/2/2017	<0.27	<0.56	<0.43	<1.7	< 0.33	<1.14	<1.71
HA-2-W	10/2/2017	<0.27	<0.56	< 0.43	<1.7	< 0.33	<1.14	<1.71
HA-3-W	10/2/2017	<0.27	<0.56	<0.43	<1.7	<0.33	<1.14	<1.71
ENFORCE MENT STAND	ARD ES = Bold	5	700	60	100	800	480	2000
PREVENTIVE ACTION LI	MIT PAL = Italics	0.5	140	12	10	160	96	400

NS = Not Sampled

(ppb) = parts per billion

(ppm) = parts per million

DRO = Diesel Range Organics

GRO = Gasoline Range Organics

A.1 Groundwater Analytical Table Waubeka Mill, Inc BRRTS #03-46-183691

Well MW-1
PVC Elevation =

0

(feet)

(bgs)

	Water	Depth to water			Ethyl		Naph-		Trimethyl-	Xylene
	Elevation	from top of PVC	Lead	Benzene	Benzene	MTBE	thalene	Toluene	benzenes	(Total)
Date	(in feet msl)	(in feet)	(ppb)	(ppb)	(ppb)	(ppb)	(ppb)	(ppb)	(ppb)	(ppb)
05/07/18	-9.55	9.55	<0.9	38	1670	<5.6	350	1930	2570	4840
12/13/18	-10.73	10.73	NS	12.4	680	<5.6	260	143	1264	789.8
03/12/19	-10.32	10.32	NS	31	1100	<5.7	260	1050	1600	2440
ENFORCEMENT STANDARD ES = Bold			15	5	700	60	100	800	480	2000
PREVENTIVE ACTION LIMIT PAL = Italics			1.5	0.5	140	12	10	160	96	400

(ppb) = parts per billion

(ppm) = parts per million

NS = not sampled

NM = not measured

Note: Elevations are presented in feet mean sea level (msl),

A.1 Groundwater Analytical Table (PAH) Waubeka Mill, Inc BRRTS #03-46-183691

Well MW-1

Date 5/7/2018	Ace- naphthene (ppb) <0.40	Acenaph- thylene (ppb) <0.45	Anthracene (ppb) <0.45	Benzo(a) anthracene (ppb) <0.85	Benzo(a) pyrene (ppb) <0.85	Benzo(b) fluoranthene (ppb) <1.00	Benzo(g,h,l) Perylene (ppb) <0.55	Benzo(k) fluoranthene (ppb) <0.70	Chrysene (ppb) <0.95	Dibenzo(a,h) anthracene (ppb) <0.50	Fluoran- thene (ppb) <1.55	Fluorene (ppb) <0.55	indeno(1,2,3-cd) pyrene (ppb) <0,60	1-Methyl- naphthalene (ppb) 41,0	2-Methyl- naphthalene (ppb) 76,0		Phenan- threne (ppb) <1.25	
	NT STANDARD = ACTION LIMIT =		3000 600	2	0.2	0.2			0.2		400 80	400 80			:	100	÷	250 50

(ppb) = parts per billion (ppm) = parts per million
NS = not sampled NM = not measured
Note: Elevations are presented in feet mean sea level (msl).

A.1 Groundwater Analytical Table Waubeka Mill, Inc BRRTS #03-46-183691

Well Sampling Conducted on:

05/07/18

VOC's		ENFORCEMENT STANDARD = ES - Bold	PREVENTIVE ACTION LIMIT = PAL - Italics
Well Name	MW-1		
Lead, dissolved/ppb	< 0.9	15	1.5
Benzene/ppb	38	5	0.5
Bromobenzene/ppb	< 8.8	25	220
Bromodichloromethane/ppb	< 6.6	0.6	0.06
Bromoform/ppb	< 9	4.4	0.44
tert-Butylbenzene/ppb	< 5	==	==
sec-Butylbenzene/ppb	< 15.8		==
n-Butylbenzene/ppb	60	22	
Carbon Tetrachloride/ppb	< 6.2	5	0.5
Chlorobenzene/ppb	< 5.2	==	==
Chloroethane/ppb	< 12.2	400	80
Chloroform/ppb	< 5.2	6	0.6
Chloromethane/ppb	< 10.8	30	3
2-Chlorotoluene/ppb	< 6.2	==	===
4-Chlorotoluene/ppb	< 5.2	(FAC)	### C
1,2-Dibromo-3-chloropropane/ppb	< 59.2	0.2	0.02
Dibromochloromethane/ppb		60	6
	< 4.4	75	15
1,4-Dichlorobenzene/ppb	< 14		
1,3-Dichlorobenzene/ppb	< 17	600	120
1,2-Dichlorobenzene/ppb	< 17.2	600	60
Dichlorodifluoromethane/ppb	< 6.4	1000	200
1,2-Dichloroethane/ppb	< 5	5	0.5
1,1-Dichloroethane/ppb	< 7.2	850	85
1,1-Dichloroethene/ppb	< 8.4	7	0.7
cis-1,2-Dichloroethene/ppb	< 7.4	70	7
trans-1,2-Dichloroethene/ppb	< 6.8	100	20
1,2-Dichloropropane/ppb	< 8.8	5	0.5
1,3-Dichloropropane/ppb	< 6	***	==
trans-1,3-Dichloropropene/ppb	< 6.4	0.4	0.04
cis-1,3-Dichloropropene/ppb	< 5.2	0.4	0.04
Di-isopropyl ether/ppb	< 4.2	==	==
EDB (1,2-Dibromoethane)/ppb	< 6.8	0.05	0.005
Ethylbenzene/ppb	1670	700	140
Hexachlorobutadiene/ppb	< 26.8	22	==
Isopropylbenzene/ppb	62	000 pag.	==
p-lsopropyltoluene/ppb	5.2 "J"	20.00	===
Methylene chloride/ppb	< 26.4	5	0.5
Methyl tert-butyl ether (MTBE)/ppb	< 5.6	60	12
Naphthalene/ppb	350	100	10
n-Propylbenzene/ppb	249	==	==
1,1,2,2-Tetrachloroethane/ppb	< 6	0.2	0.02
1,1,1,2-Tetrachloroethane/ppb	< 7	70	7
Tetrachloroethene (PCE)/ppb	< 7.6	5	0.5
Toluene/ppb	1930	800	160
1,2,4-Trichlorobenzene/ppb	< 23	70	14
1,2,3-Trichlorobenzene/ppb	< 34.2	200	
1,1,1-Trichloroethane/ppb	< 6,6	200	40
1,1,2-Trichloroethane/ppb	< 8.4	5	0.5
Trichloroethene (TCE)/ppb	< 6	5	0.5
Trichlorofluoromethane/ppb	< 7	==	==
1,2,4-Trimethylbenzene/ppb	2030	Total TMB's 480	Total TMB's 96
1,3,5-Trimethylbenzene/ppb	540		
Vinyl Chloride/ppb	< 4	0.2	0.02
m&p-Xylene/ppb	3600	Total Xylenes 2000	Total Xylenes 400
o-Xylene/ppb	1240	. Ottal Aylelles 2000	10tal Aylelles 400

NS = not sampled, NM = Not Measured

Q = Analyte detected above laboratory method detection limit but below practical quantitation limit.

^{= =} No Exceedences

⁽ppb) = parts per billion
"J" Flag: Analyte detected between LOD and LOQ LOD Limit of Detection LOQ Limit of Quantitation

A.2 Soil Analytical Results Table

(PAH)
Waubeka Mill, Inc BRRTS #03-46-183691

		·							, i													D	IRECT CONTAC	CT
	Depth	Saturation		Acenaph-	Acenaph-		Benzo(a)	Benzo(a)	Benzo(b)	Benzo(g,h,I)	Benzo(k)		Dibenzo(a,h)			Indeno(1,2,3-cd)	1-Methyl-	2-Methyl-	Naph-	Phenan-				Cumulative
Sample	(feet)	U/S	Date	thene	thylene	Anthracene	anthracene	pyrene	fluoranthene	perylene	fluoranthene	Chrysene	anthracene	Fluoranthene	Fluorene	pyrene	naphthalene	naphthalene	thalene	threne	Pyrene	Exeedance	Hazard	Cancer
		-		(ppm)	(ppm)	(ppm)	(ppm)	(ppm)	(ppm)	(ppm)	(ppm)	(ppm)	(ppm)	(ppm)	(ppm)	(ppm)	(ppm)	(mqq)	(ppm)	(ppm)	(ppm)	Count	Index	Risk
G-1-1	3.5	U	10/02/17	<0.0151	<0.0159	<0.0109	<0.0116	<0.0113	<0.013	<0.0114	<0.0147	<0.0121	< 0.0078	< 0.0147	<0.0179	< 0.0114	0.127	0.216	0.257	<0.0111	<0.0153	0	0.0149	1.7E-07
G-1-5	16	S	10/02/17	<0.0151	<0.0159	<0.0109	<0.0116	<0.0113	< 0.013	<0.0114	< 0.0147	<0.0121	<0.0078	< 0.0147	<0.0179	<0.0114	< 0.0203	< 0.0113	<0.0153	<0.0111	<0.0153			
G-2-1	3.5	U	10/02/17	<0.0151	<0.0159	<0.0109	<0.0116	<0.0113	< 0.013	<0.0114	<0.0147	<0.0121	<0.0078	< 0.0147	<0.0179	<0.0114	< 0.0203	<0.0113	< 0.0153	<0.0111	0.0203	0		
G-3-1	3.5	U	10/02/17	< 0.0151	<0.0159	<0.0109	0.0218	0.0213	0.033	0.084	0.0186	0.0257	<0.0078	0.048	<0.0179	0.0185	< 0.0203	< 0.0113	< 0.0153	0.0155	0.045	0	0.0012	2.7E-07
G-4-1	3.5	U	10/02/17	<0.0151	<0.0159	<0.0109	<0.0116	<0.0113	<0.013	<0.0114	<0.0147	<0.0121	<0.0078	<0.0147	<0.0179	<0.0114	<0.0203	<0.0113	<0.0153	<0.0111	<0.0153	0		
Groundwa	ter RCL				Here:	196.9492		0.47	0.4781	Here	1688	0.1442	***	88.8778	14.8299) Wester	C ASE	444	0.6582	***	54.5455			
Non-Indus	trial Direct C	ontact RCL		3590	Max.	17900	1.14	0.115	1.15	B1257.	11.5	115	0.115	2390	2390	1.15	17.6	239	5.52	****	1790		1.00E+00	1.00E-05
Industrial I	Direct Conta	ct RCL		(45200)	T	(100000)	(20.8)	(2.11)	(21.1)	****	(211)	(2110)	(2.11)	(30100)	(30100)	(21.1)	(72.7)	(3010)	(24.1)	3444	(22600)			
Soil Satura	ition Concer	ntration (C-sat)*		3223	***	(4 H = 1			(444)	C ++++	1999	244	1248	2250									

Bold = Groundwater RCL Exceedance

Bold & Underline = Non Industrial Direct Contact RCL Exceedance (Bold & Parentheses) = Industrial Direct Contact RCL Exceedance

NM = Not Measured ND = No Detects

Bold & Asteric * = C-sat Exceedance

NS = Not Sampled
(ppm) = parts per million

PAH = Polynuclear Aromatic Hydrocarbons

PID = Photoionization Detector VOC's = Volatile Organic Compounds

U=UNSATURATED (BASED ON ALL TIME LOW WATER TABLE PER WDNR) S=SATURATED (BASED ON ALL TIME LOW WATER TABLE PER WDNR)

A.2 Soil Analytical Results Table Waubeka Mill, Inc BRRTS #03-46-183691

																	DI	RECT CONTAC	Ť
Sample	Depth	Saturation	Date	PID	Lead	DRO	GRO		Ethyl-		Naph-		1,2,4-Trime-	1,3,5-Trime-	Xylene	Other VOC's			Cumulative
ID	(feet)	U/S			(ppm)	(ppm)	(ppm)	Benzene	benzene	MTBE	thalene	Toluene	thylbenzene	thylbenzene	(Total)	(ppb)	Exeedance	Hazard	Cancer
	(1001)	5.0			(1-17	(- /	(1-1)	(ppm)	(ppm)	(ppm)	(ppm)	(ppm)	(ppm)	(ppm)	(ppm)	,	Count	Index	Risk
WM-1	5.0-6.0	U	01/07/98	NS	NS	17	350	NS	NS	NS	NS	NS	NS	NS	NS	NS			
G-1-1	3.5	U	10/02/17	1905	6.82	NS	NS	0.0265	0.76	<0.025	0.257	0.037	3.05	0.630	1.67	NS	0	0.0149	1.7E-07
G-1-2	8.0	U	10/02/17	>5000						NOT	SAMPLED					NS			
G-1-3	12.0	S	10/02/17	43.5	NS	NS	NS	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.075	NS			
G-1-4	16.0	S	10/02/17	21.5						NOT :	SAMPLED					NS			
G-1-5	16.0	S	10/02/17	12.3	NS	NS	NS	<0.025	<0.025	<0.025	<0.0153	<0.025	<0.025	<0.025	<0.075	NS			ļ
G-2-1	3.5	U	10/02/17	17.5	8.61	NS	NS	<0.025	<0.025	<0.025	<0.0153	<0.025	<0.025	<0.025	<0.075	NS	0		
G-2-2	7.0	U	10/02/17	22.2						NOT :	SAMPLED					NS			
G-2-3	13.0	S	10/02/17	12.5	NS	NS	NS	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.075	NS			
G-2-4					"			NO RE	COVERY							NS			
G-2-5	16.0	S	10/02/17	10.8	NS	NS	NS	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.075	NS			
G-3-1	3.5	U	10/02/17	21.3	35.1	NS	NS	<0.025	<0.025	<0.025	<0.0153	<0.025	<0.025	<0.025	<0.075	NS	0	0.0012	2.7E-07
G-3-2	8.0	U	10/02/17	11.4						NOT :	SAMPLED					NS			
G-3-3	12.0	S	10/02/17	9.8	NS	NS	NS	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	< 0.075	NS			
G-3-4	16.0	S	10/02/17	9.5						NOT	SAMPLED		1			NS			
G-3-5	18.0	S	10/02/17	9.8	NS	NS	NS	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.075	NS			
G-4-1	3.5	U	10/02/17	12	15.1	NS	NS	<0.025	<0.025	<0.025	<0.0153	<0.025	<0.025	<0.025	<0.075	NS	0		
G-4-2	8.0	U	10/02/17	26.2						NOT	SAMPLED					NS			
G-4-3	9.0	Ū	10/02/17	9.7	NS	NS	NS	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	< 0.075	NS			
G-4-4	14.0	S	10/02/17	14.9			-			NOT:	SAMPLED					NS			
G-4-5	19.0	Ü	10/02/17	14	NS	NS	NS	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.075	NS			
G-5-1	3.5	Ü	10/02/17	8.3	NS	NS	NS	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.075	NS	0		
G-5-2	8.0	Ü	10/02/17	10.6						NOT	SAMPLED			,		NS			
G-5-3	12.0	S	10/02/17	7						NOT:	SAMPLED					NS			
G-5-4	14.0	S	10/02/17	10.7	NS	NS	NS	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.075	NS			
G-6-1	3.5	Ū	10/02/17	26.7	NS	NS	NS	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	< 0.075	NS	0		
G-6-2	8.0	Ū	10/02/17	15.4						NOT:	SAMPLED					NS			
G-6-3	12.0	S	10/02/17	28.2						NOT	SAMPLED					NS			
G-6-4	15.0	S	10/02/17	22.1	NS	NS	NS	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.075	NS			
G-7-1	3.5	Ü	10/02/17	18.4	NS	NS	NS	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.075	NS	0		
G-7-2	8.0	Ü	10/02/17	15.1							SAMPLED					NS			
G-7-3	12.0	S	10/02/17	21.3	NS	NS	NS	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.075	NS			
G-7-4	14.0	S	10/02/17	18							SAMPLED					NS			
HA-1-1	0.5	Ü	10/02/17	8.7	NS	NS	NS	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.075	NS			
	0.0		. 0, 02, 17																
Groundwat	er RCL				27		-	0.0051	1.57	0.027	0.6582	1.1072	1.3	787	3.96	= =			
		t Contact RO	L		400	-	•	1.6	8.02	63.8	5.52	818	219	182	260	ж	1.00E+00		1.00E-05
Industrial [(800)		•	(7.07)	(35.4)	(282)	(24.1)	(818)	(219)	(182)	(260)	#	1.00E+00		1.00E-05
		entration (C	-sat)*		2	-		1820*	480*	8870*		818*	219*	182*	260*				
Backgroun					52														
9		DOL France									t	-							

Bold = Groundwater RCL Exceedance

Bold & Underline = Non Industrial Direct Contact RCL Exceedance (Bold & Parentheses) = Industrial Direct Contact RCL Exceedance

NM = Not Measured ND = No Detects

Bold & Asteric * = C-sat Exceedance

Underlined = Background Threshold

NS = Not Sampled

(ppm) = parts per million

DRO = Diesel Range Organics GRO = Gasoline Range Organics

PID = Photoionization Detector

PVOC's = Petroleum Volatile Organic Compounds

VOC's = Volatile Organic Compounds

Note: Non-Industrial RCLs apply to this site.

U=UNSATURATED (BASED ON ALL TIME LOW WATER TABLE PER WDNR) S≍SATURATED (BASED ON ALL TIME LOW WATER TABLE PER WDNR)

A.2 Soil Analytical Results Table Waubeka Mill, Inc BRRTS #03-46-183691

																	DI	RECT CONTAC	T
Sample	Depth	Saturation	Date	PID	Lead	DRO	GRO		Ethyl-		Naph-		1,2,4-Trime-	1,3,5-Trime-	Xylene	Other VOC's			Cumulative
ID	(feet)	U/S			(ppm)	(ppm)	(ppm)	Benzene		MTBE	thalene	Toluene	thylbenzene	thylbenzene	(Total)	(ppb)	Exeedance	Hazard	Cancer
	(/				/	/		(ppm)	(ppm)	(ppm)	(ppm)	(ppm)	(ppm)	(ppm)	(ppm)		Count	Index	Risk
MW-1-1	3.5	U	03/16/18	732	-			tu	***************************************		NOT S	SAMPLED	V 10500				0		
MW-1-2	7.0	U	03/16/18	522	NS	NS	NS	1.95	18.4	<0.25	3.8	40	32	10.9	66.2	NS			
MW-1-3	12.0	S	03/16/18	19.4							NOT S	SAMPLED							
MW-1-4	16.0	S	03/16/18	10.7							NOT S	SAMPLED							
MW-1-5	20.0	S	03/16/18	4.8							NOT S	SAMPLED							
																TCLP Lead <0.1 TCLP Benzene			
DRUM CON	/POSITE		03/16/18	NS	NS	56.7	116				N	OT SAMP	LED			<0.05			
Groundwat	er RCL				27			0.0051	1.57	0.027	0.6582	1.1072	1.3	787	3.96	-			
Non-Indust		t Contact RC	CL		400	¥.	-	1.6	8.02	63.8	5.52	818	219	182	260			1.00E+00	1.00E-05
Industrial D					(800)	•	7	(7.07)	(35.4)	(282)	(24.1)	(818)	(219)	(182)	(260)	*		1.00E+00	1.00E-05
Soil Saturat	tion Cond	entration (C	-sat)*		7	140	74	1820*	480*	8870*		818*	219*	182*	260*	i#			
Background	d Thresh	old Value			52														

Bold = Groundwater RCL Exceedance

Bold & Underline = Non Industrial Direct Contact RCL Exceedance (Bold & Parentheses) = Industrial Direct Contact RCL Exceedance

Bold & Asteric * = C-sat Exceedance

Underlined = Background Threshold

NS = Not Sampled (ppm) = parts per million

ND = No Detects

NM = Not Measured

DRO = Diesel Range Organics

GRO = Gasoline Range Organics

PID = Photoionization Detector

PVOC's = Petroleum Volatile Organic Compounds
VOC's = Volatile Organic Compounds
Note: Non-Industrial RCLs apply to this site.

U=UNSATURATED (BASED ON ALL TIME LOW WATER TABLE PER WDNR) S=SATURATED (BASED ON ALL TIME LOW WATER TABLE PER WDNR)

A.3 Residual Soil Analytical Results Table Waubeka Mill, Inc BRRTS #03-46-183691

																	DI	RECT CONTACT	T
Sample	Depth	Saturation	Date	PID	Lead	DRO	GRO		Ethyl-		Naph-		1,2,4-Trime-	1,3,5-Trime-	Xylene	Other VOC's			Cumulative
ID ID	(feet)	U/S			(ppm)	(ppm)	(ppm)	Benzene	benzene	MTBE	thalene	Toluene	thylbenzene	thylbenzene	(Total)	(ppb)	Exeedance	Hazard	Cancer
	, ,					,, ,		(ppm)	(ppm)	(ppm)	(ppm)	(ppm)	(ppm)	(ppm)	(ppm)		Count	Index	Risk
G-1-1	3.5	U	10/02/17	1905	6.82	NS	NS	0.0265	0.76	<0.025	0.257	0.037	3.05	0.630	1.67	NS	0	0.0149	1.7E-07
G-3-1	3.5	Ų	10/02/17	21.3	35.1	NS	NS	<0.025	<0.025	<0.025	<0.0153	<0.025	<0.025	<0.025	<0.075	NS	0	0.0012	2.7E-07
MW-1-2	7.0	U	03/16/18	522	NS	NS	NS	1.95	18.4	<0.25	3.8	40	32	10.9	66.2	NS			
Groundwat	er RCL	**			27	(#E		0.0051	1.57	0.027	0.6582	1.1072	1.3	787	3.96	*			
Non-Indust	rial Direc	t Contact RO	CL		400	(4)	#8	1.6	8.02	63.8	5.52	<u>818</u>	<u>219</u>	182	260	*		1.00E+00	1.00E-05
Industrial D	irect Cor	ntact RCL			(800)			(7.07)	(35.4)	(282)	(24.1)	(818)	(219)	(182)	(260)	*		1.00E+00	1.00E-05
Soil Saturat			-sat)*		(E)	339		1820*	480*	8870*	(100)	818*	219*	182*	260*	5			
Background	d Thresh	old Value			52														

Bold = Groundwater RCL Exceedance

<u>Bold & Underline = Non Industrial Direct Contact RCL Exceedance</u> (Bold & Parentheses) = Industrial Direct Contact RCL Exceedance Bold & Asteric * = C-sat Exceedance

Underlined = Background Threshold

NS = Not Sampled

NM = Not Measured

(ppm) = parts per million

ND = No Detects

DRO = Diesel Range Organics

GRO = Gasoline Range Organics
PID = Photoionization Detector

PVOC's = Petroleum Volatile Organic Compounds

VOC's = Volatile Organic Compounds

Note: Non-Industrial RCLs apply to this site.

U=UNSATURATED (BASED ON ALL TIME LOW WATER TABLE PER WDNR) S=SATURATED (BASED ON ALL TIME LOW WATER TABLE PER WDNR)

A.6 Water Level Elevations Waubeka Mill, Inc BRRTS #03-46-183691 Waubeka, Wisconsin

	MW-1
Ground Surface (feet)	0.00
Well Depth (feet)	20.50
Top of screen (bgs)	10.50
Bottom of screen (bgs)	20.50

Depth to Water From Ground Surface (bgs)

05/07/18	9.55
12/13/18	10.73
03/12/19	10.32

bgs = Below Ground Surface

A.7 Other Groundwater NA Indicator Results Waubeka Mill, Inc BRRTS #03-46-183691

Well MW-1

	Dissolved					Nitrate +	Total	Dissolved	Man-
Date	Oxygen	рН	ORP	Temp	Specific	Nitrite	Sulfate	Iron	ganese
	(ppm)			(C)	Conductance	(ppm)	(ppm)	(ppm)	(ppb)
05/07/18	2.11	7.14	-62	9.70	3810	<0.36	44.5	0.22	276
12/13/18	3.02	8.19	-36.3	10.72	7006	NS	NS	NS	NS
03/12/19	3.43	7.09	-238.1	5.91	10.10	NS	NS	NS	NS
ENFORCEM	ENT STAND	ARD = ES	- Bold			10	-	-	300
PREVENTIV	E ACTION LI	MIT = PAL	- Italics			2	-	-	60

(ppb) = parts per billion

(ppm) = parts per million

NS = not sampled

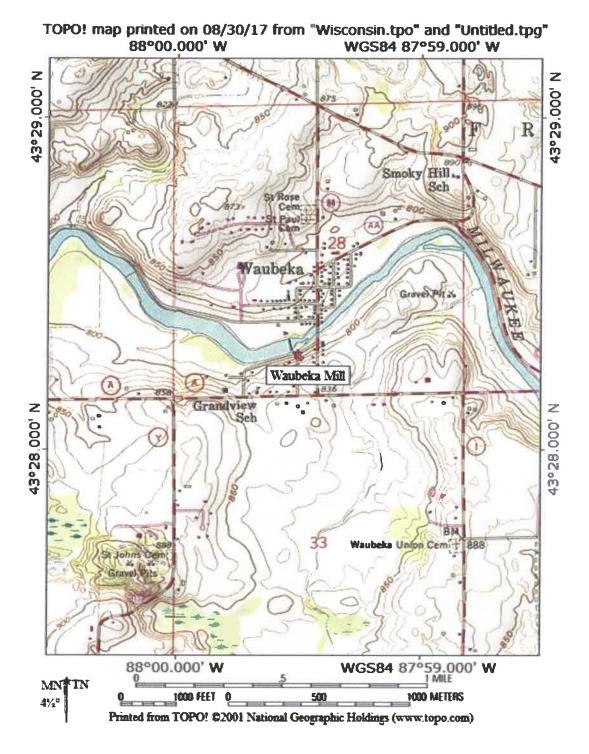
NM = not measured

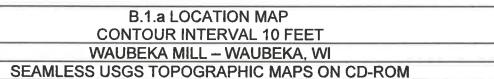
ORP = Oxidation Reduction Potential

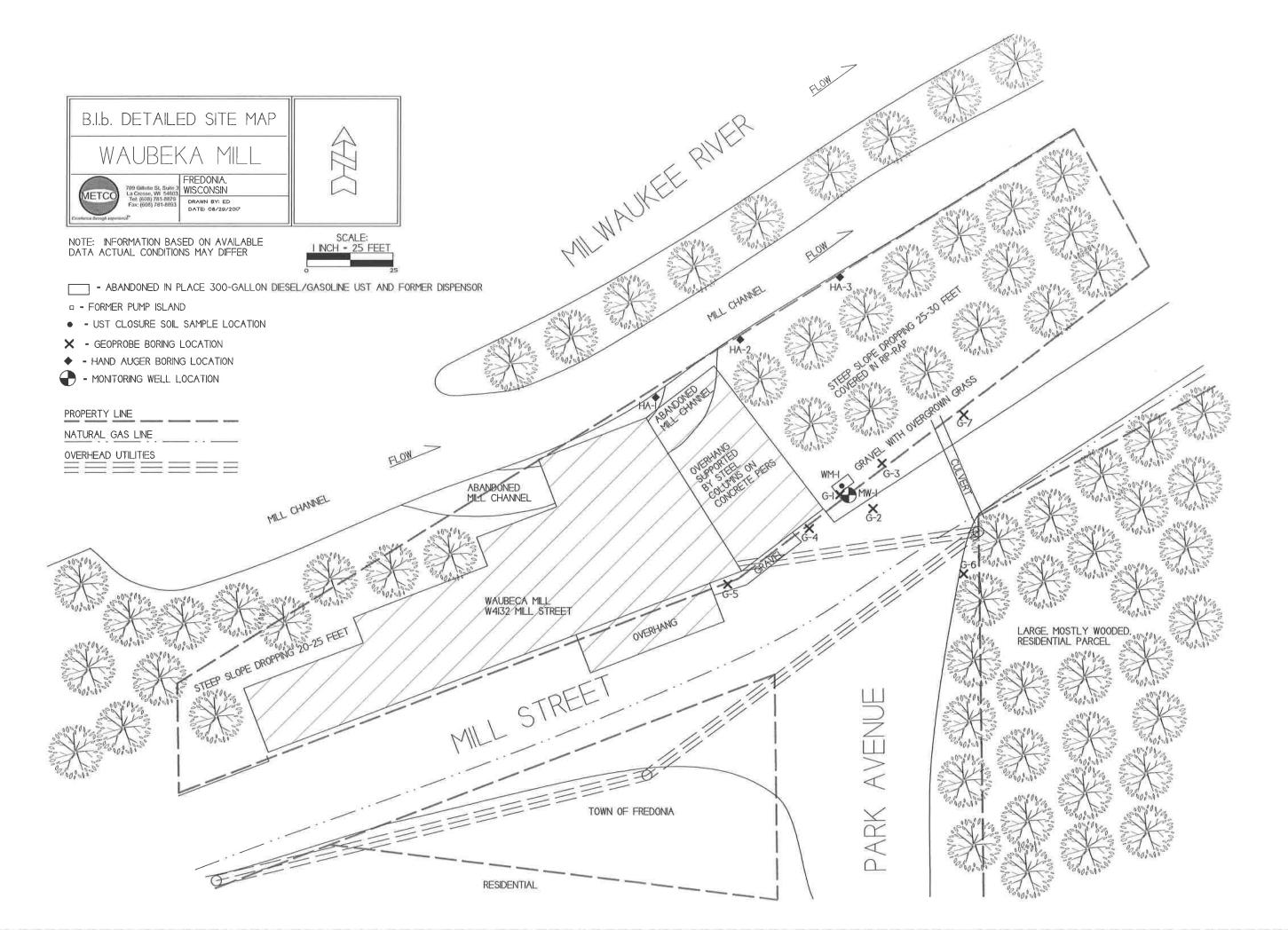
Note: Elevations are presented in feet mean sea level (msl).

Attachment B/Maps and Figures

- **B.1 Location Maps**
 - **B.1.a Location Map**
 - **B.1.b Detailed Site Map**
 - B.1.c RR Site Map
- **B.2 Soil Figures**
 - **B.2.a Soil Contamination**
 - **B.2.b Residual Soil Contamination**
- **B.3 Groundwater Figures**
 - B.3.a Geologic Cross-Section Figure(s)
 - **B.3.b Groundwater Isoconcentration**
 - B.3.c Groundwater Flow Direction Not Applicable (only one monitoring well)
 - **B.3.d Monitoring Wells**
- B.4 Vapor Maps and Other Media
 - B.4.a Vapor Intrusion Map No Vapor Samples were collected
 - B.4.b Other media of concern No surface waters or sediments were assessed as part of the site investigation.
 - B.4.c Other Not applicable.
- B.5 Structural Impediment Photos There were no structural impediments to the completion of the investigation.

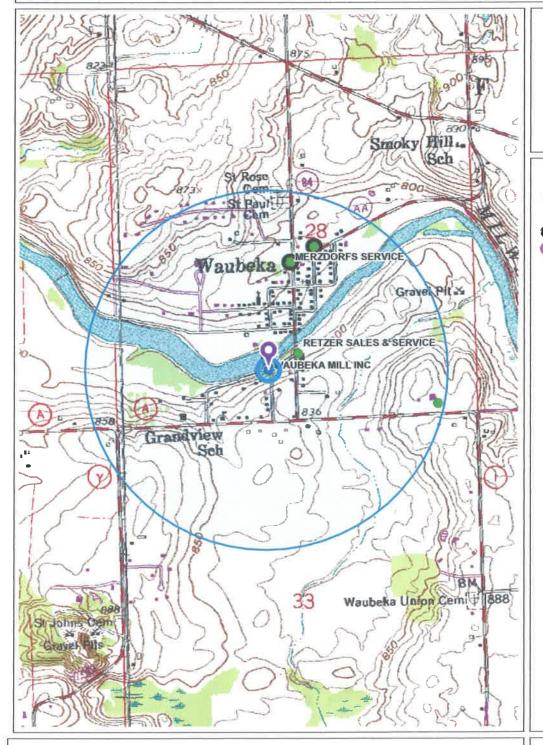








B.1.c. RR Site Map





Legend

- Open Site
- Closed Site
- Continuing Obligations Apply
- Facility-wide Site

0.3 0 0.3 Miles

1: 15,840

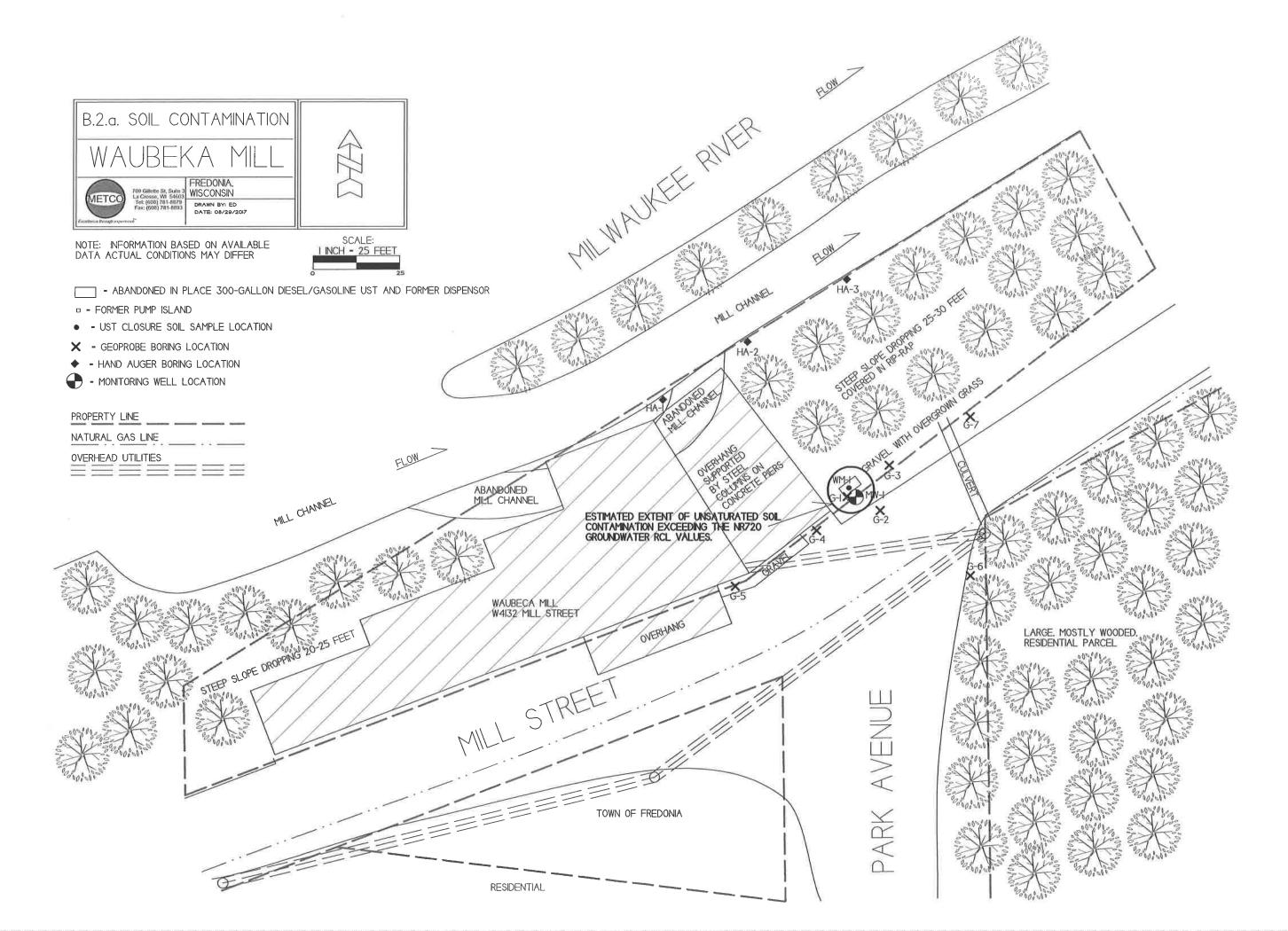


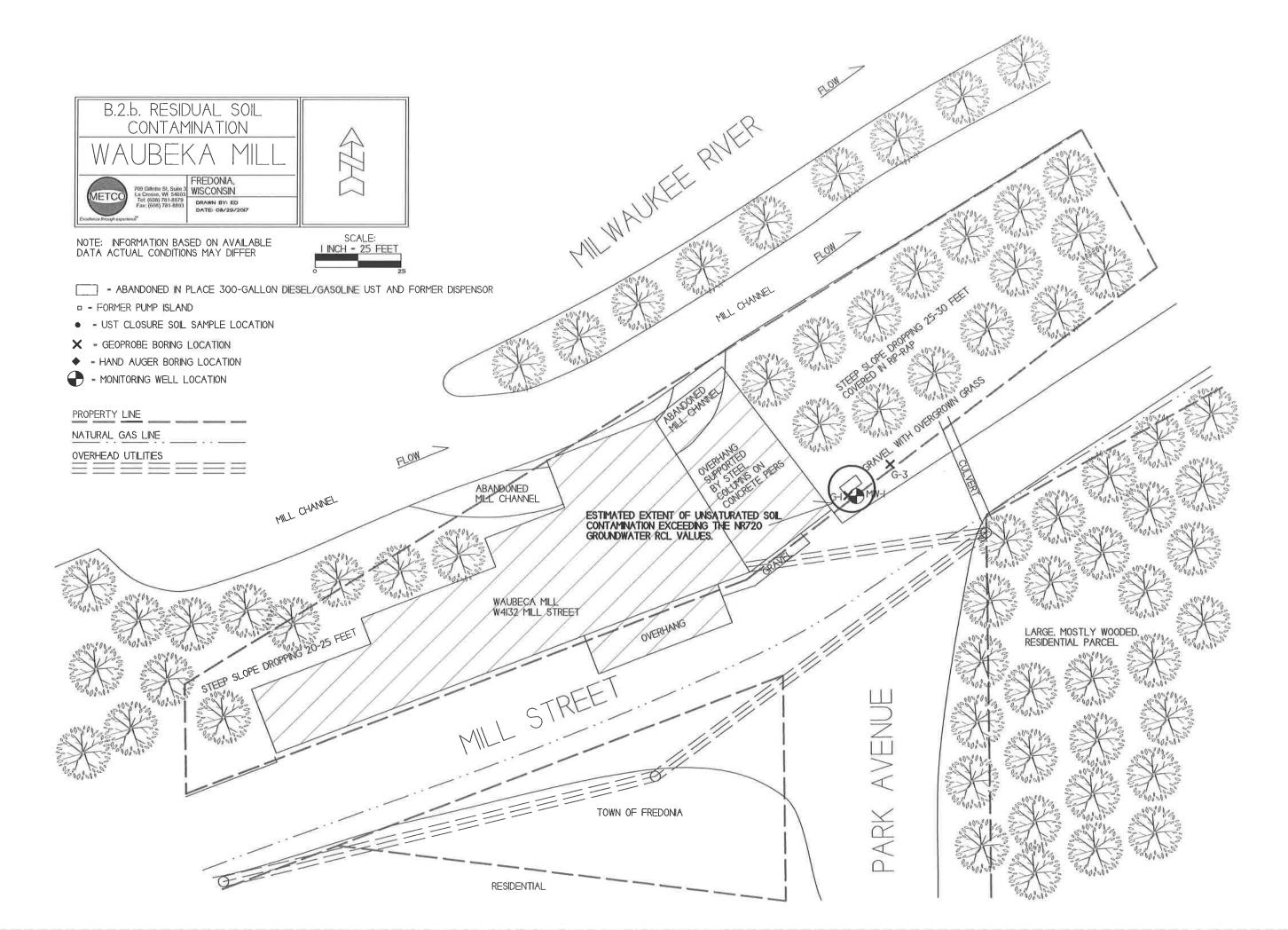
NAD_1983_HARN_Wisconsin_TM

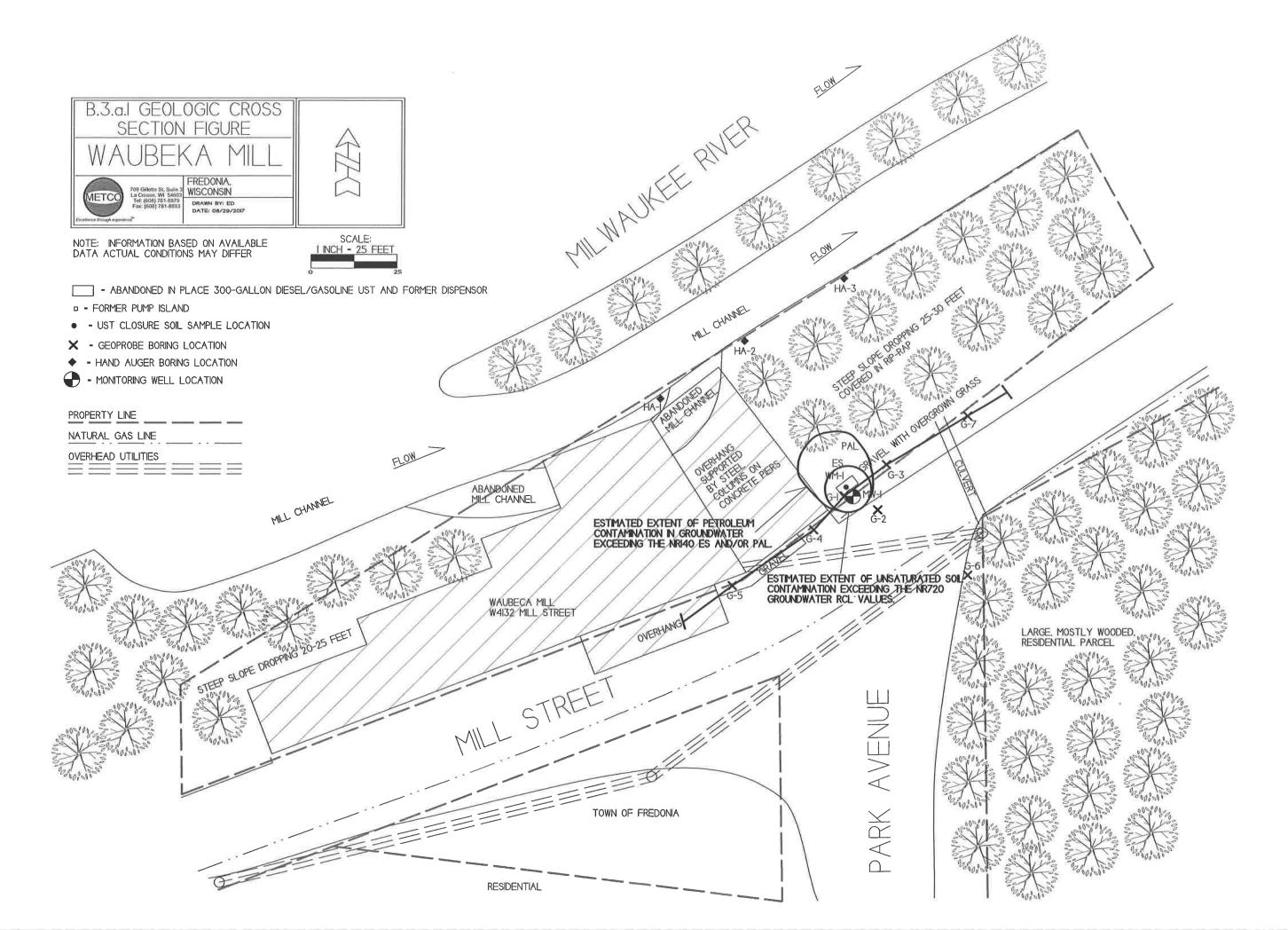
DISCEAIMER: The information shown on these maps has been obtained from various sources, and are of varying age, reliability and resolution. These maps are not intended to be used for navigation, nor are these maps an authoritative source of information about legal land ownership or public access. No warranty, expressed or implied, is made aregarding accuracy, applicability for a particular use, completements, or legality of the information depicted on this map. For more information, see the DNR Legal Notices web page: http://dnr.wi.gov/org/legali/

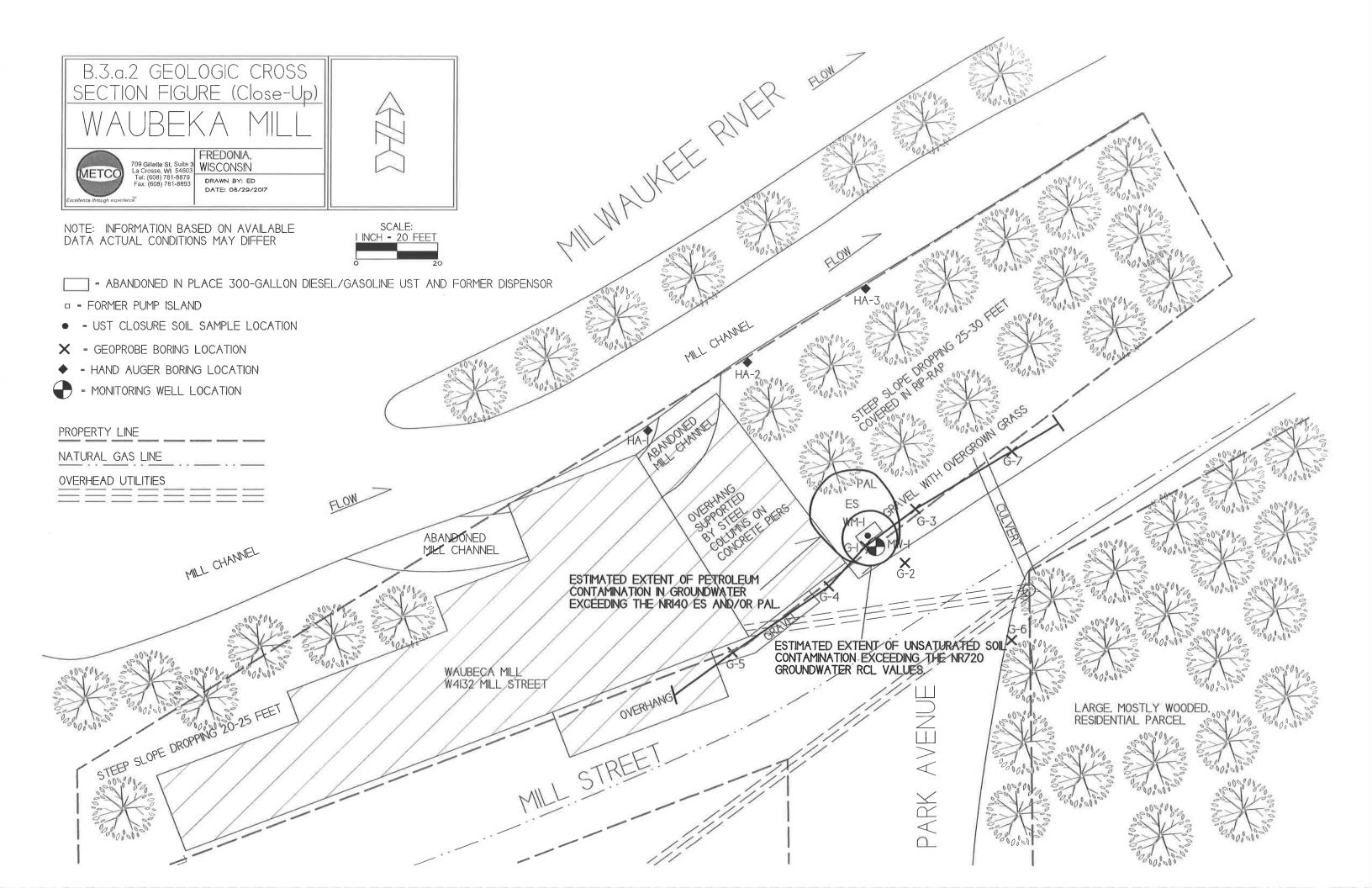
Note: Not all sites are mapped.

Notes











NOTE: SOIL AND GROUNDWATER SAMPLE DATA IS BASED ON LABORATORY RESULTS FAUN SAMPLES COLLECTED DURING THE FOLLOWING EVENTS:

- GEOPROBE PROJECT (10/2/17) - DRILLING PROJECT (3/16/18)

NOTE: SOIL RESULTS SHOW DETECTS
AND EXCEEDANCES THAT HAVE BEEN

ROUND 3 GROUNDWATER SAMPLING (3/12/19)

- MONITORING WELL LOCATION

GEOPROBE BORING LOCATION

X - SOIL SAMPLING LOCATION

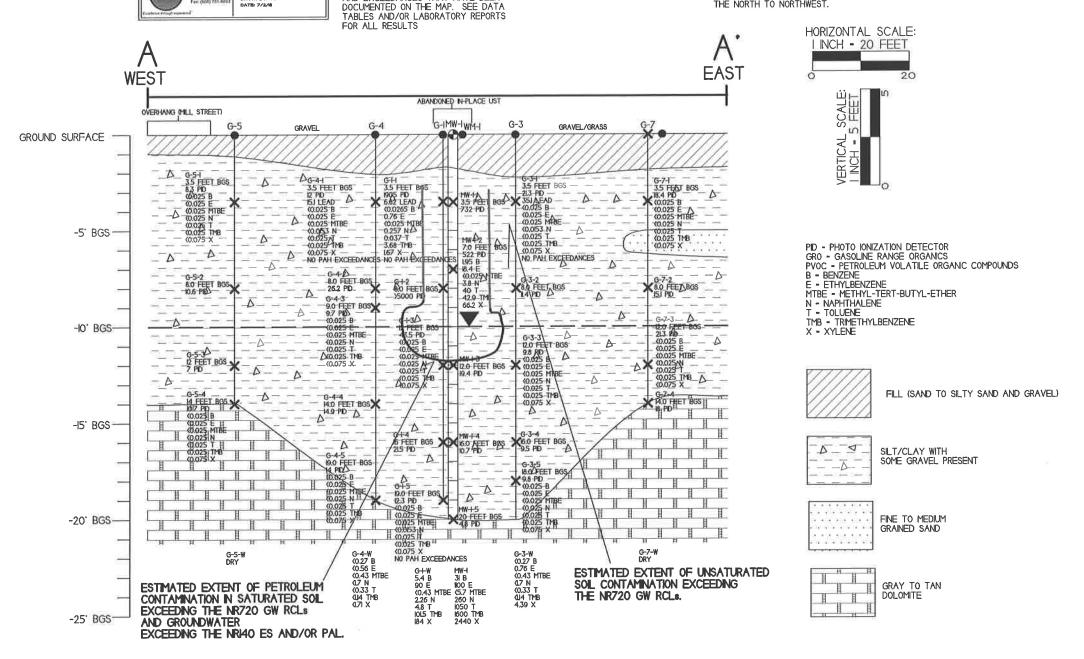
- WATERTABLE

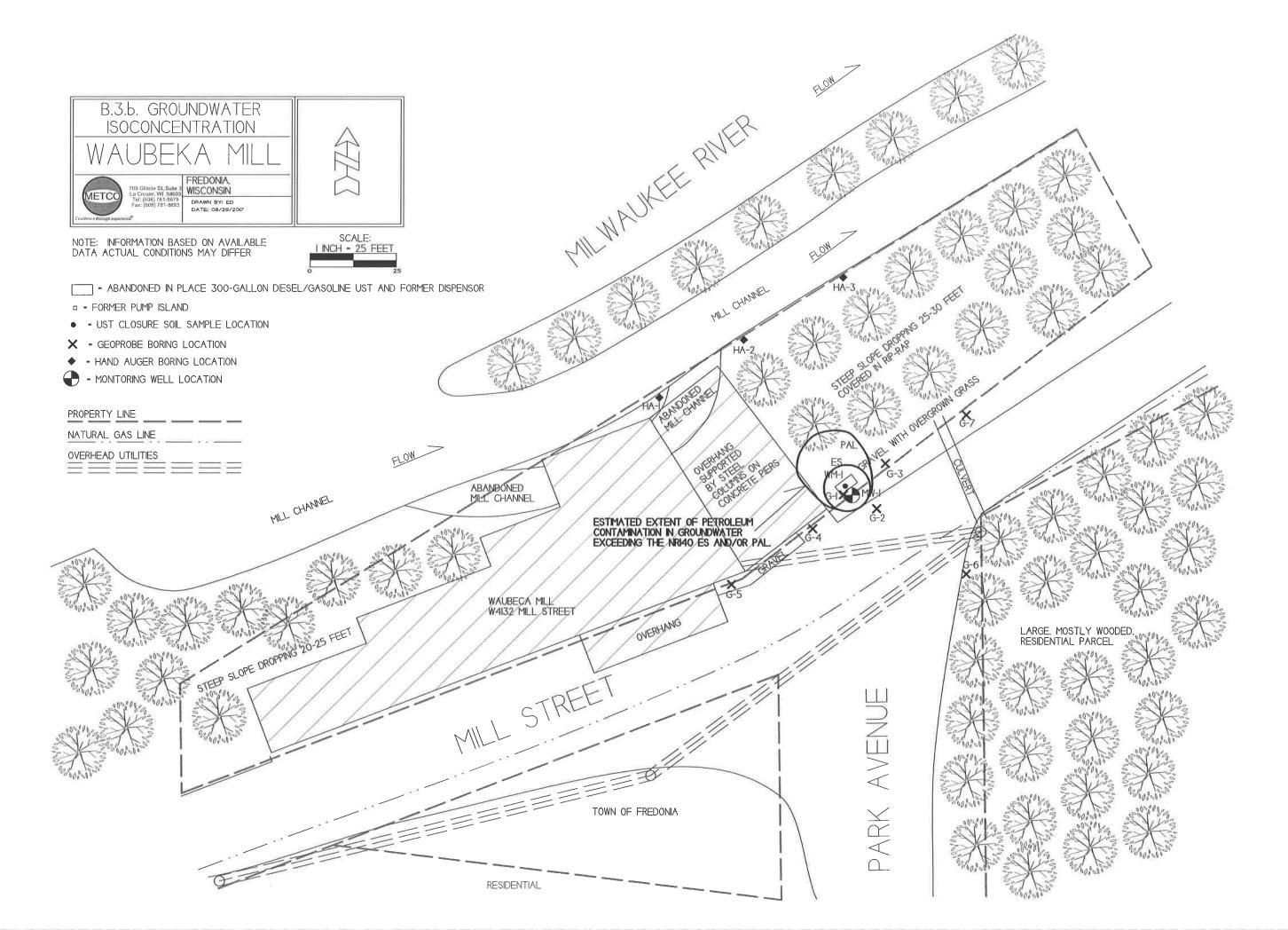
INFORMATION BASED ON AVAILABLE DATA, ACTUAL CONDITIONS MAY DIFFER

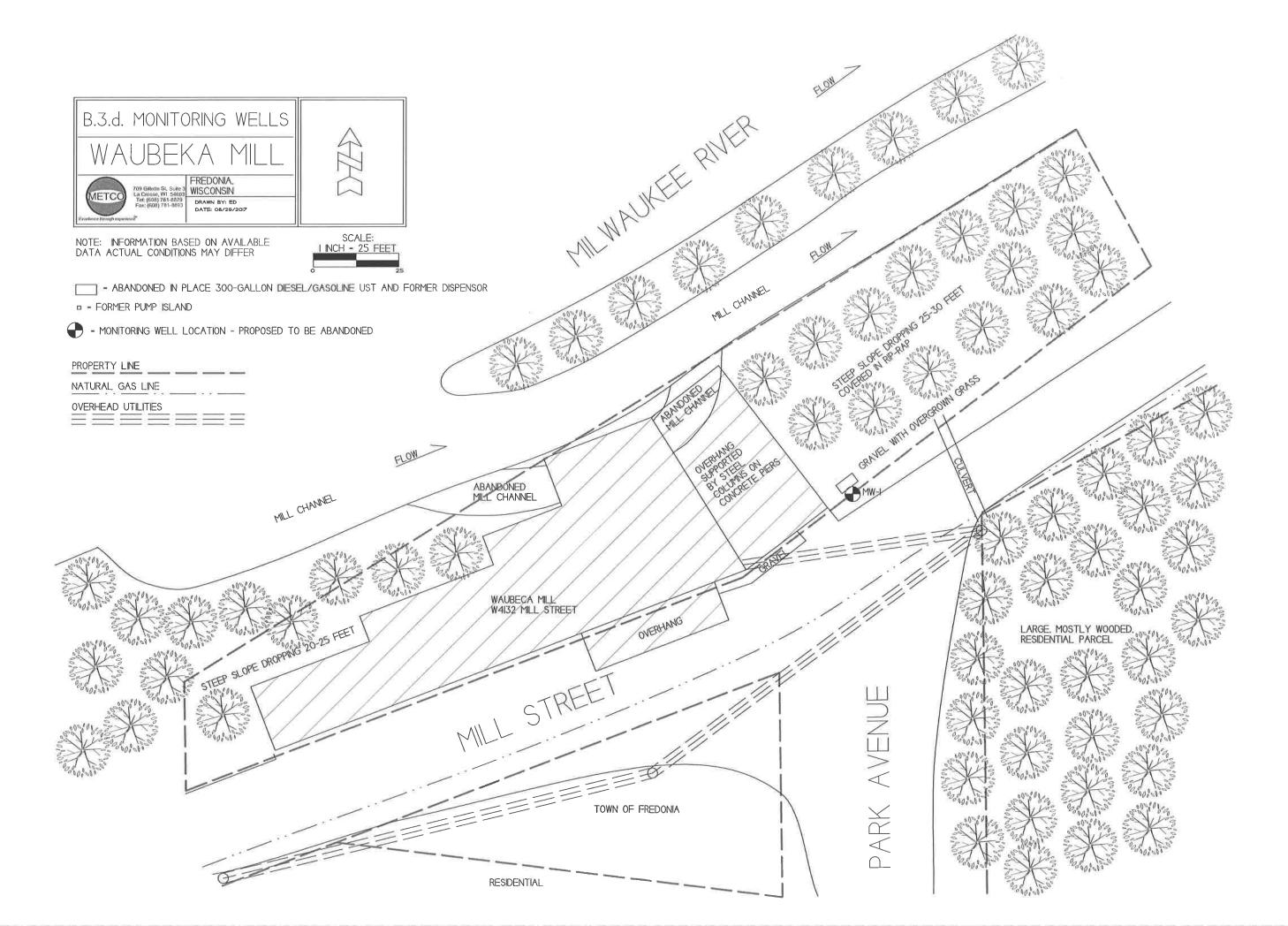
SOIL SAMPLE RESULTS ARE PRESENTED IN PARTS PER MILLION (PPM).

GROUNDWATER SAMPLE RESULTS ARE PRESENTED IN PARTS PER BILLION (PPB).

GROUNDWATER FLOW IS ESTIMATED TO BE TOWARD THE NORTH TO NORTHWEST.







Attachment C/Documentation of Remedial Action

- C.1 Site Investigation documentation All other site investigation activities are documented in the following reports:
 - Site Investigation Report July 31, 2018

Work completed since the last submittal to the WDNR Includes the following:

On December 13, 2018, METCO personnel collected groundwater samples from monitoring well MW-1 for laboratory analysis (PVOC and Naphthalene). Field measurements for water level, temperature, pH, ORP, Dissolved Oxygen and Specific Conductance were collected from the sampled monitoring well. A Potable Well Field Reconnaissance was conducted during the groundwater sampling event.

On March 12, 2019, METCO personnel collected groundwater samples from monitoring well MW-1 for laboratory analysis (PVOC and Naphthalene). Field measurements for water level, temperature, pH, ORP, Dissolved Oxygen and Specific Conductance were collected from the sampled monitoring well.

Included in C.1 are the laboratory reports from the two rounds of groundwater sampling and a potable well field recon map.

C.2 Investigative waste

- C.3 Provide a description of the methodology used along with all supporting documentation if the Residual Contaminant Levels are different than those contained in the Department's RCL Spreadsheet available at:

 http://dnr.wi.goc/topic/brownfields.Professionals.html\- Residual Contaminant Levels (RCLs) were established in accordance with NR 720.10 and NR 720.12. Soil RCL for the protection of the groundwater pathway and for non-industrial direct contact were taken from the RR programs RCL spreadsheet.
- C.4 Construction documentation No remedial systems were installed.
- C.5 Decommissioning of Remedial Systems No remedial systems were installed.
- C.6 Other Not Applicable

Synergy Environmental Lab,

C.1 Site
Investigation
Documentation 1990 Prospect Ct., Appleton, WI 54914 *P 920-830-2455 * F 920-733-0631

JACQUELYN VOEKS JACQUELYN VOEKS

Report Date 24-Dec-18

680 EMERALD PT HOLLISTER, MO 65672

Project Name WAUBEKA MALL

Invoice # E35613

Project #

Lab Code

5035613A

Sample ID Sample Matrix Water

MW-1

	Sample Matrix Sample Date	12/13/2018	Result	Unit	LOD LO	OQ Di	il	Method	Ext Date	Run Date	Analyst	Code
C	rganic											
	PVOC + Napht	halene										
	Benzene		12.4 "J"	ug/l	4.4	14.2	20	8260B		12/21/2018	CJR	1
	Ethylbenzene		680	ug/l	5.2	16.6	20	8260B		12/21/2018	CJR	1
	Methyl tert-butyl eth	ner (MTBE)	< 5.6	ug/l	5.6	17.8	20	8260B		12/21/2018	CJR	1
	Naphthalene		260	ug/l	42	133	20	8260B		12/21/2018	CJR	1
	Toluene		143	ug/l	3.8	12	20	8260B		12/21/2018	CJR	1
	1,2,4-Trimethylbenz	ene	1150	ug/l	16	51	20	8260B		12/21/2018	CJR	1
	1,3,5-Trimethylbenz	ene	114	ug/l	12.6	40	20	8260B		12/21/2018	CJR	1
	m&p-Xylene		770	ug/l	8.6	27.6	20	8260B		12/21/2018	CJR	1
	o-Xylene		19.8	ug/l	5.8	18.6	20	8260B		12/21/2018	CJR	1

Invoice # E35613

Project Name WAUBEKA MALL

Project #

Lab Code

5035613B

TRIP BLANK Sample ID

Sample Matrix Water Sample Date 12/13/2018

Sample Date	12/13/2016	Result	Unit	LOD LO	OQ Dil		Method	Ext Date	Run Date	Analyst	Code
Organic											
PVOC + Naph	thalene										
Benzene		< 0.22	ug/l	0.22	0.71	1	8260B		12/20/2018	CJR	I
Ethylbenzene		< 0.26	ug/l	0.26	0.83	1	8260B		12/20/2018	CJR	1
Methyl tert-butyl e	ther (MTBE)	< 0.28	ug/l	0.28	0.89	1	8260B		12/20/2018	CJR	1
Naphthalene	, ,	< 2.1	ug/l	2.1	6.65	I	8260B		12/20/2018	CJR	1
Toluene	T.	< 0.19	ug/l	0.19	0.6	1	8260B		12/20/2018	CJR	1
1,2,4-Trimethylber	nzene	< 0.8	ug/l	0.8	2.55	1	8260B		12/20/2018	CJR	1
1,3,5-Trimethylber		< 0.63	ug/l	0.63	2	1	8260B		12/20/2018	CJR	1
m&p-Xylene		< 0.43	ug/l	0.43	1.38	1	8260B		12/20/2018	CJR	1
o-Xylene		< 0.29	ug/l	0.29	0.93	1	8260B		12/20/2018	CJR	1
•											

"J" Flag: Analyte detected between LOD and LOQ

LOD Limit of Detection

LOQ Limit of Quantitation

Code Comment

1

Laboratory QC within limits.

All solid sample results reported on a dry weight basis unless otherwise indicated. All LOD's and LOQ's are adjusted for dilutions but not dry weight. Subcontracted results are denoted by SUB in the analyst field.

Authorized Signature

Michael Richer

CHAIN OF STODY RECORD

Quote No.:

Lab I.D. #

Account No. :

Synergy

Environmental Lab, Inc.

Chain #	N°	347 5
Page 1	of	1

Sample Handling Request

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Synergy Environmental Lab,

1990 Prospect Ct., Appleton, WI 54914 *P 920-830-2455 * F 920-733-0631

JACQUELYN VOEKS JACQUELYN VOEKS 680 EMERALD PT HOLLISTER, MO 65672

Report Date 21-Mar-19

Project Name WAUBEKA MILL

Invoice # E35875

Project #

Lab Code

5035875A

Sample ID

MW-1

Sample Matrix Water

Sample Date 3/12/2019

	Result	Unit	LOD LO	OQ Di	il	Method Ext Date	Run Date Analyst	Code
Organic								
PVOC + Naphthalene								
Benzene	31	ug/l	2.2	6.9	10	GRO95/8021	3/16/2019 CJR	1
Ethylbenzene	1100	ug/l	5.3	16.9	10	GRO95/8021	3/16/2019 CJR	1
Methyl tert-butyl ether (MTBE)	< 5.7	ug/l	5.7	18.2	10	GRO95/8021	3/16/2019 CJR	1
Naphthalene	260	ug/l	17	53.8	10	GRO95/8021	3/16/2019 CJR	1
Toluene	1050	ug/l	4.5	14.5	10	GRO95/8021	3/16/2019 CJR	1
1,2,4-Trimethylbenzene	1390	ug/l	7.3	23.3	10	GRO95/8021	3/16/2019 CJR	1
1,3,5-Trimethylbenzene	210	ug/l	7.5	23.9	10	GRO95/8021	3/16/2019 CJR	1
m&p-Xylene	2140	ug/l	10	31.7	10	GRO95/8021	3/16/2019 CJR	1
o-Xylene	300	ug/l	5.8	18.4	10	GRO95/8021	3/16/2019 CJR	1

Project Name WAUBEKA MILL Invoice # E35875

Project #

Lab Code5035875BSample IDTBSample MatrixWater

Sample Date 3/12/2019

	Result	Unit	LOD L	OQ Dil		Method	Ext Date	Run Date	Analyst	Code
Organic										
PVOC + Naphthalene										
Benzene	< 0.22	ug/l	0.22	0.69	1	GRO95/80	021	3/16/2019	CJR	1
Ethylbenzene	< 0.53	ug/l	0.53	1.69	1	GRO95/80	021	3/16/2019	CJR	1
Methyl tert-butyl ether (MTBE)	< 0.57	ug/l	0.57	1.82	1	GRO95/80	021	3/16/2019	CJR	11,
Naphthalene	< 1.7	ug/l	1.7	5.38	1	GRO95/80	021	3/16/2019	CJR	1.
Toluene	< 0.45	ug/l	0.45	1.45	1	GRO95/80	021	3/16/2019	CJR	1.
1,2,4-Trimethylbenzene	< 0.73	ug/l	0.73	2.33	1	GRO95/80	021	3/16/2019	CJR	1
1,3,5-Trimethylbenzene	< 0.75	ug/l	0.75	2.39	1	GRO95/80	021	3/16/2019	CJR	1
m&p-Xylene	< 1	ug/l	1	3.17	1	GRO95/80	021	3/16/2019	CJR	1
o-Xylene	< 0.58	ug/l	0.58	1.84	1	GRO95/80	021	3/16/2019	CJR	1

[&]quot;J" Flag: Analyte detected between LOD and LOQ

1

LOD Limit of Detection

LOQ Limit of Quantitation

Code Comment

.

Laboratory QC within limits.

All solid sample results reported on a dry weight basis unless otherwise indicated. All LOD's and LOQ's are adjusted for dilutions but not dry weight. Subcontracted results are denoted by SUB in the analyst field.

Authorized Signature

Michael Richer

CHAIN OF JSTODY RECORD

Quote No.:

Lab I.D. #

Account No. 4

Synergy

Environmental Lab, Inc.

Chain #	No	3	18	5
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Page ____ of ___

Sample Handling Request

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Potable Well Field Reconnaissance Map

Scale: 1 = 100'

Approximate Location of Potable Well

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Attachment D/Maintenance Plan(s)

- 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 via cap maintenance plan. A maintenance plan is not being required at this time.
- D.2 Location map(s) A maintenance plan is not being required at this time.
- D.3 Photographs A maintenance plan is not being required at this time.
- D.4 Inspection log A maintenance plan is not being required at this time.

Attachment E/Monitoring Well Information

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

Attachment F/Source Legal Documents

- F.1 Deed
- F.2 Certified Survey Map
- F.3 Verification of Zoning
- F.4 Signed Statement



1076872

RONALD A. VOIGT
OZAUKEE COUNTY
REGISTER OF DEEDS
RECORDED ON
05/13/2019 11:38 AM
REC FEE: 30.00

TRANS FEE: 3.00 PAGES: 4 EXEMPT #:

After recording return to:

Charles Sheridan Jr.
2331 Church Street
Evanston, Illinois 60202

1027195

SPACE ABOVE THIS LINE FOR RECORDER'S USE

QUIT CLAIM DEED

This Quit Claim Deed (this "DEED") is made between Waubeka Mill, Inc., a Wisconsin corporation (the "GRANTOR") and Waubeka Development LLC, a Wisconsin limited liability company (the "GRANTEE").

For and in consideration of \$3500.00 (subject to the provisions of this Deed), GRANTOR does hereby convey, release and quitclaim all of the Grantor's rights, title, and interest in and to the below described Property to the GRANTEE, and to the GRANTEE'S successors and assigns forever, so that neither Grantor(s) nor Grantor's successors or assigns shall have, claim or demand any right or title to the Property, premises, or appurtenances, or any part thereof.

For the purposes of this Deed, the "Property" means the following described real estate, together with the rents, profits, fixtures and other appurtenant interests, situated at W4132 Mill Street, Fredonia, in the County of Ozaukee, State of Wisconsin, as more particularly described as follows:

Legal Description:

158/472 COMM 831 FT N & 252 FT W OF SE COR SE SW TH SW 150 FT S 3 FT SW 175 FT N 32 FT NW'LY ALG RIVER 314 FT SE 46 FT POB 0.32 AC SEC 28 T 12 R 2146 FT POB 0.32 AC SEC 28 T 12 R 21

[Note to JV: Legal description to be updated upon receipt of title commitment. Title company will require for closing!]

See Attached Legal Description

Grantee agrees to return to Grantor all personal property in the 4 drawer fireproof file cabinet and the 2 drawer fireproof file cabinet located within the Property.

Grantor agrees to immediately pay off the existing lien placed upon the Property by the Wisconsin Department of Natural Resources ("DNR") in the amount of Two Thousand Five Hundred and 00/100 Dollars (\$2,500.00), as evidenced by that certain Notice of Lien recorded with the Ozaukee County Register of Deeds' Office on June 29, 2017, as Document No. 1051432.

Grantor will continue to diligently pursue and be responsible for the current DNR remediation of the Property until a closure letter from the WDNR. Grantor will promptly supply a copy of the letter to Grantee after Grantor's receipt.

Tax Parcel Number: 04-028-12-003-00

This property is not a homestead.

Mail Tax Statements To:

Waubeka Development LLC c/o Charles Sheridan Jr. 2331 Church Street Evanston, Illinois 60202

[SIGNATURE PAGE FOLLOWS]

Grantor Signature:

WAUBEKA MILL, INC. By Juguelyn M. Voeks
Title: President
DATED: 4/30/19
Waubeka Mill, Inc. Jacquelyn M Voeks 680 Emerald Pointe Drive Bldg 5 Condo 7 Hollister, Missouri, 65672
STATE OF Missouri) SS. COUNTY OF Toney)
The foregoing instrument was acknowledged before me on this 30 day of april, 2019 by Jacquelyn M. Voeks, as of Waubeka Mill, Inc., on behalf of said entity
Print Name: Carrie A Smits Notary Public, State of Missouri My Commission Expires: 12.05.2021
NOTARY SEAL)
Drafted By:
Danny S. Tang Godfrey & Kahn, S.C.
20508215.2



F.3 Verification of Zoning

Ozaukee County

Owner (s):

WAUBEKA DEVELOPMENT LLC

Location:

School District:

1945 - Northern Ozaukee School

Mailing Address:

WAUBEKA DEVELOPMENT LLC

2331 CHURCH STREET

EVANSTON, IL 60202

Request Mailing Address Change

Status:

04-028-12-003.00 45006-Town of Fredonia Active

Alternate Tax Parcel Number: Acres:

Tax Parcel ID Number: Tax District:

0.3200

Description - Comments (Please see Documents tab below for related documents. For a complete legal description, see recorded document.):

1076872 COMM 831 FT N & 252 FT W OF SE COR SE SW TH SW 150 FT S 3 FT SW 175 FT N 32 FT NW'LY ALG RIVER 314 FT SE 46 FT POB 0.32 AC SEC 28 T 12 R 21

Site Address (es): (Site address may not be verified and could be incorrect. DO NOT use the site address in lieu of legal description.)

W4132 MILL ST Fredonia, WI 53021

Tax Year: 2019

Click here for detailed assessment data. (square footage, year built, building type, etc)

Real Estate Assessments

Code Description Acres Land Value Improvement Value Total Value

Commercial 0.32 \$35,900

\$6,100

\$42,000 .

Total:

0.32 \$35,900

\$6,100

\$42,000

Estimated Fair Market Value:

Average Assessment Ratio:

* MFL and PFC values are not included in the total.

F.4. Signed Statement

WDNR BRRTS Case #: 03-46-183691

WDNR Site Name: Waubeka Mill

Geographic Information System (GIS) Registry of Closed Remediation Sites

In compliance with the revisions to the NR 700 rule series requiring certain closed sites to be listed on the Geographic Information System (GIS) Registry of Closed Remediation Sites (Registry) effective Nov., 2001, I have provided the following information.

To the best of my knowledge the legal descriptions provided and attached to this statement are complete and accurate.

Responsible Party:

Environmental Consulting, Fuel System Design, Installation and Service

Attachment G/Notifications to Owners of Affected Properties

- G.A. Notification to Source Property Owner for Residual Soil and Groundwater Contamination.
- G.B. Notification to Town of Fredonia for Residual Soil and Groundwater Contamination in the ROW of Mill Street.
- **G.2 Certified Survey Map**
- **G.3 Verification of Zoning**
- **G.4 Signed Statement**



E-mail (Firstname.Lastname@wisconsin.gov) lee.delcore@wisconsin.gov

Notification of Continuing Obligations and Residual Contamination Form 4400-286 (9/15) C. I. Page

The affected property is:	2					
 the source property (the source of the ha conducted the cleanup (a deeded proper 	zardous substance o	discharge), but the pro	perty is	not owned by	the per	son who
conducted the cleanup (a deeded proper a deeded property affected by contaming	ty) ation from the source	nronerty				
a right-of-way (ROW)	ation from the source	property				
a Department of Transportation (DOT) R	OW					
			TOWNS STREET, CO.	PROPERTY POSTANCE PROF	NA CHETATIVE	author Disease Wheels
Include this completed page as an attack	ment with all not	ifications provided	unde	r sections A	and B	A PROPERTY OF THE PARTY OF THE
Contact Information						
Responsible Party: The person responsible cleanup is:	e for sending this fo	orm, and for conducti	ng the	environmen	tal inves	tigation and
Responsible Party Name Waubeka Mill Inc.						
Contact Person Last Name	First		MI	Mary Contract of the Contract		ude area code)
Voeks	Jacquelin			(20	(2) 707	
Address		City				ZIP Code
680 Emerald PT., Building 5, Condo 7		Hollister			MO	65672
E-mail jvoeks@gmail.com						
Name of Party Receiving Notification:						
Business Name, if applicable: Waubeka Devel	opment LLC					
Title Last Name	First		T MI	Phone Num	ber (incl	ide area code)
to whom it may concern					25 150	
Address		City			State	ZIP Code
2331 Church Street		Evanston			IL	60202
Site Name and Source Property Informati	ion:					
	ion.					
Site (Activity) Name Waubeka Mill		10:4-			State	ZIP Code
Address		City Fedonia			WI	53021
W4132 Mill Street		(DATCP) ID#	_		1112	33021
DNR ID # (BRRTS#) 03-46-183691		(DATCP) ID#				
Contacts for Questions:						
If you have any questions regarding the clear	up or about this no	otification, please co	ntact th	e Responsil	ole Party	dentified
above, or contact:						
Environmental Consultant: METCO				TEC	11 1	
Contact Person Last Name	First		MI			ide area code)
Powell	Jason	[Park and a second sec	P	(60	8) 781	
Address		City				ZIP Code
709 Gillette Street Suite 3		La Crosse			WI	54603
E-mail jasonp@metcohq.com						
€						
Department Contact:						
To review the Department's case file, or for qu	uestions on cleanu	ps or closure require	ments,	contact:		
Department of: Natural Resources (DNR)						
Address		City				IP Code
1155 Pilgrim Parkway		Plymouth			WI	53073
Contact Person Last Name	First		MI			ide area code)
Delcore	Lee			(92	20) 893-	8524



Notification of Continuing Obligations and Residual Contamination

Form 4400-286 (9/15)

Page 1 of 3

Section A: Deeded Property Notification: Residual Contamination and/or Continuing Obligations

KEEP THIS DOCUMENT WITH YOUR PROPERTY RECORDS

2331 Church Street Evanston, IL, 60202

Dear to whom it may concern:

I am providing this letter to inform you of the location and extent of contamination remaining on your property, and of certain long-term responsibilities (continuing obligations) for which you may become responsible. I have investigated a release of:

petroleum

on W4132 Mill Street, Fedonia, WI, 53021 that has shown that contamination remains on this source property. I have responded to the release and will be requesting that the Department of Natural Resources (DNR) grant case closure. Closure means that the DNR will not be requiring any further investigation or cleanup action to be taken. However, continuing obligations may be imposed as a condition of closure approval.

You have 30 days to comment on the attached legal description of your property and on the proposed closure request:

Please review the enclosed legal description of your property, and notify Jason Powell at 709 Gillette Street Suite 3, La Crosse, WI, 54603 within the next 30 days if the legal description is incorrect.

The DNR will not review my closure request for at least 30 days after the date of receipt of this letter. As an affected property owner, you have a right to contact the DNR to provide any technical information that you may have that indicates that closure should not be granted for this site. If you would like to submit any information that is relevant to this closure request, or if you want to waive the 30 day comment period, you should mail that information to the DNR contact: 1155 Pilgrim Parkway, Plymouth, WI, 53073, or at lee.delcore@wisconsin.gov.

Your Long-Term Responsibilities as a Property Owner and Occupant:

The responses included

numerous rounds of groundwater sampling and geoprobe/drilling projects.

The continuing obligations I am proposing that affect your property are listed below, under the heading Continuing Obligations. Under s. 292.12 (5), Wis. Stats., current and future owners and occupants of this property are responsible for complying with continuing obligations imposed as part of an approved closure.

The fact sheet "Continuing Obligations for Environmental Protection" (DNR publication RR 819) has been included with this letter, to help explain the responsibilities you may have for maintenance of a certain continuing obligation, the limits of any liability for investigation and cleanup of contamination, and how these differ. If the fact sheet is lost, you may obtain copies at http://dnr.wi.gov/files/PDF/pubs/rr/RR819.pdf.

Contract for responsibility for continuing obligation:

Before I request closure, I will need to inform the DNR as to whom will be responsible for the continuing obligation/s on your property.

No contract has been worked out between RP and property owner.

Under s. 292.12, Wis. Stats., the responsibility for maintaining all necessary continuing obligations for your property will fall on you or any subsequent property owner, unless another person has a legally enforceable responsibility to comply with the requirements of the final closure letter. If you need more time to finalize an agreement on the responsibility for the continuing obligations on your Property, you may request additional time from the DNR contact identified in Contact Information.

(Note: Future property owners would need to negotiate a new agreement.)

AFFECTED
A
PROPERTY

6.A.

Notification of Continuing Obligations and Residual Contamination

Form 4400-286 (9/15)

Page 2 of 3

Remaining Contamination:

Soil Contamination:

Soil contamination remains at:

W4132 Mill Street

The remaining contaminants include:

Lead, Benzene, Ethylbenzene, Naphthalene, Toluene, Trimethylbenzenes, and Xylene.

at levels which exceed the soil standards found in ch. NR 720, Wis. Adm. Code. The following steps have been taken to address any exposure to the remaining soil contamination.

Natural Attenuation.

Groundwater Contamination:

Groundwater contamination originated at the property located at W4132 Mill Street, Fedonia, WI, 53021. The levels of

Benzene, Ethylbenzene, Naphthalene, Toluene, Trimethylbenzenes, and Xylene.

contamination in the groundwater on your property are above the state groundwater enforcement standards found in ch. NR 140, Wis. Adm. Code.

However, the environmental consultants who have investigated this contamination have informed me that this groundwater contaminant plume is stable or receding and will naturally degrade over time. I believe that allowing natural attenuation, or the breakdown of contaminants in groundwater due to naturally occurring processes, to complete the cleanup at this site will meet the case closure requirements of ch. NR 726, Wis. Adm. Code. As part of my request for case closure, I am requesting that the DNR accept natural attenuation as the final remedy for this site.

The following DNR fact sheet (RR 671, "What Landowners Should Know: Information About Using Natural Attenuation to Clean Up Contaminated Groundwater") has been included with this notification, to help explain the use of natural attenuation as a remedy. If the fact sheet is lost, you may obtain a copy at http://dnr.wi.gov/files/PDF/pubs/rr/RR671.pdf.

Continuing Obligations on Your Property: As part of the cleanup, I am proposing that the following continuing obligations be used at your property, to address future exposure to residual contamination. If my closure request is approved, you will be responsible for the following continuing obligations.

To construct a new well or to reconstruct an existing well, the property owner at the time of construction or reconstruction will need to obtain prior approval from the DNR. See the paragraph GIS Registry and Well Construction Requirements. Typically, this results in casing off a portion of the aquifer during drilling, when needed, to protect the water supply.

Residual Soil Contamination:

If soil is excavated from the areas with residual contamination, the property owner at the time of excavation will be responsible for the following:

determine if contamination is present

determine whether the material would be considered solid or hazardous waste

ensure that any storage, treatment or disposal is in compliance with applicable statutes and rules.

Contaminated soil may be managed in-place, in accordance with ch. NR 718, Wis. Adm. Code, with prior DNR approval. In addition, all current and future property 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 during excavation activities to prevent a 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 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.



6.A.

Notification of Continuing Obligations and Residual Contamination

Form 4400-286 (9/15)

Page 3 of 3

Maintenance and Audits of Continuing Obligations:

If compliance with a maintenance plan is required as part of a continuing obligation, an inspection log will need to be filled out periodically, and kept available for inspection by the DNR. Submittal of the inspection log may also be required. You will also need to notify any future owners or occupants of this property of the need to maintain the continuing obligation and to document that maintenance in the inspection log. Periodic audits of these continuing obligations may be conducted by the DNR, to ensure that potential exposure to residual contamination is being addressed. The DNR provides notification before conducting site visits as part of the audit.

GIS Registry and Well Construction Requirements:

If this site is closed, all properties within the site boundaries where contamination remains, or where a continuing obligation is applied, will be listed on the Bureau for Remediation and Redevelopment Tracking System (BRRTS) on the Web, at http://dnr.wi.gov/topic/Brownfields/clean.html. Inclusion on this database provides public notice of remaining contamination and of any continuing obligations. Documents can be viewed on this database, and include final closure letters, site maps and any applicable maintenance plans. The location of the site may also be viewed on the Remediation and Redevelopment Sites Map (RR Sites Map), on the "GIS Registry" layer, at the same internet address listed above.

DNR approval prior to well construction or reconstruction is required for all sites included in the GIS Registry, in accordance with s. NR 812.09 (4) (w), Wis. Adm. Code. This requirement applies to private drinking water wells and high capacity wells. Special well construction standards may be necessary to protect the well from the remaining contamination. Well drillers need to first obtain approval from a regional water supply specialist in DNR's Drinking Water and Groundwater Program. The well construction application, form 3300–254, is on the internet at http://dnr.wi.gov/topic/wells/documents/3300254.pdf.

Site Closure:

If the DNR grants closure, you will receive a letter which defines the specific continuing obligations on your property. The status of the site (open or closed) may also be checked by searching BRRTS on the Web. You may view or download a copy of the closure letter (sent to the responsible party) from BRRTS on the Web. You may also request a copy of the closure letter from the **responsible party** or by writing to the DNR contact, at Lee Delcore, lee. delcore@wisconsin.gov, (920) 893-8524. The final closure letter will contain a description of the continuing obligation, any prohibitions on activities and will include any applicable maintenance plan.

If you have any questions regarding this notification, I can be reached at: (608) 781-8879 jasonp@metcohq.com

Signature of responsible party/environmental consultant for the responsible party

Date Signed

Attachments

Contact Information

Legal Description for each Parcel:

Factsheets:

RR 819, Continuing Obligations for Environmental Protection

RR 671, What Landowners Should Know: Information About Using Natural Attenuation to Clean Up Contaminated Groundwater

AFFECTED Α PROPERTY B.3.a.I GEOLOGIC CROSS SECTION FIGURE FREDONIA WISCONSIN DRAWN BY: ED DATE: 08/29/2017 FLOW SCALE: I INCH - 25 FEET NOTE: INFORMATION BASED ON AVAILABLE DATA ACTUAL CONDITIONS MAY DIFFER - ABANDONED IN PLACE 300-GALLON DIESEL/GASOLINE UST AND FORMER DISPENSOR MILL CHANNEL - FORMER PUMP ISLAND • - UST CLOSURE SOIL SAMPLE LOCATION X - GEOPROBE BORING LOCATION ESTIMATED EXTENT OF UNSATURATED SOL CONTAMINATION EXCEEDING THE NR720 GROUNDWATER RCL VALUES (LEAD ONLY) ◆ - HAND AUGER BORING LOCATION - MONITORING WELL LOCATION PROPERTY LINE NATURAL GAS LINE OVERHEAD UTILITIES ABANDONED MILL CHANNEL MILL CHANNEL ESTIMATED EXTENT OF PETROLEUM CONTAMINATION IN GROUNDWATER EXCEEDING THE NRI40 ES AND/OR PAL ESTIMATED EXTENT OF UNSATURATED SOIL CONTAMINATION EXCEEDING THE NR720 GROUNDWATER RCL VALUES WAUBECA MILL W4I32 MILL STREET STEEP SLOPE DROPPING 20-25 FEET LARGE, MOSTLY WOODED.
RESIDENTIAL PARCEL MILL STREE ARK AVENUE TOWN OF FREDONIA RESIDENTIAL

6.A.

COMPLETE THIS SECTION ON DELIVERY **SENDER: COMPLETE THIS SECTION** Complete items 1, 2, and 3. ☐ Agent Print your name and address on the reverse ☐ Addressee so that we can return the card to you. C. Date of Delivery B. Received by (Printed Name) Attach this card to the back of the mailpiece, 7/5/19 STEVEN or on the front if space permits. D. Is delivery address different from item 1? $\ \square$ Yes 1 Articla Addressed to: If YES, enter delivery address below: ☐ No Waubeka Development, LLC 2331 Church Street ANSTON, JLL. 60202 Evanston, IL 60202 3. Service Type ☐ Adult Signature ☐ Priority Mail Express® ☐ Registered Mail™ Registered Mall Restricted Delivery Return Receipt for Merchandise Adult Signature Restricted Delivery Certified Mall® Certified Mall Restricted Delivery 9590 9403 0958 5223 6284 70 Collect on Delivery Collect on Delivery Restricted Delivery Insured Mail Insured Mail Restricted Delivery (over \$500) ☐ Signature Confirmation™ ☐ Signature Confirmation 2 Article Number (Transfer from service label) 015 1660 0000 4342 8865 Restricted Delivery PS Form 3811, July 2015 PSN 7530-02-000-9053 Domestic Return Receipt

AFFECTED
A
PROPERTY

After recording return to:

Charles Sheridan Jr.
2331 Church Street
Evanston, Illinois 60202



1076872

RONALD A. VOIGT
OZAUKEE COUNTY
REGISTER OF DEEDS
RECORDED ON
05/13/2019 11:38 AM
REC FEE: 30.00
TRANS FEE: 3.00

PAGES: 4
EXEMPT #:

1027195

SPACE ABOVE THIS LINE FOR RECORDER'S USE

QUIT CLAIM DEED

This Quit Claim Deed (this "DEED") is made between Waubeka Mill, Inc., a Wisconsin corporation (the "GRANTOR") and Waubeka Development LLC, a Wisconsin limited liability company (the "GRANTEE").

For and in consideration of \$3500.00 (subject to the provisions of this Deed), GRANTOR does hereby convey, release and quitclaim all of the Grantor's rights, title, and interest in and to the below described Property to the GRANTEE, and to the GRANTEE'S successors and assigns forever, so that neither Grantor(s) nor Grantor's successors or assigns shall have, claim or demand any right or title to the Property, premises, or appurtenances, or any part thereof.

For the purposes of this Deed, the "Property" means the following described real estate, together with the rents, profits, fixtures and other appurtenant interests, situated at W4132 Mill Street, Fredonia, in the County of Ozaukee, State of Wisconsin, as more particularly described as follows:

Legal Description:

158/472 COMM 831 FT N & 252 FT W OF SE COR SE SW TH SW 150 FT S 3 FT SW 175 FT N 32 FT NW'LY ALG RIVER 314 FT SE 46 FT POB 0.32 AC SEC 28 T 12 R 2146 FT POB 0.32 AC SEC 28 T 12 R 21

[Note to JV: Legal description to be updated upon receipt of title commitment. Title company will require for closing!]

See Attached Legal Description

AFFECTED A PROPERTY

F.1 DEED

Grantee agrees to return to Grantor all personal property in the 4 drawer fireproof file cabinet and the 2 drawer fireproof file cabinet located within the Property.

Grantor agrees to immediately pay off the existing lien placed upon the Property by the Wisconsin Department of Natural Resources ("DNR") in the amount of Two Thousand Five Hundred and 00/100 Dollars (\$2,500.00), as evidenced by that certain Notice of Lien recorded with the Ozaukee County Register of Deeds' Office on June 29, 2017, as Document No. 1051432.

Grantor will continue to diligently pursue and be responsible for the current DNR remediation of the Property until a closure letter from the WDNR. Grantor will promptly supply a copy of the letter to Grantee after Grantor's receipt.

Tax Parcel Number: 04-028-12-003-00

This property is not a homestead.

Mail Tax Statements To:

Waubeka Development LLC c/o Charles Sheridan Jr. 2331 Church Street Evanston, Illinois 60202

[SIGNATURE PAGE FOLLOWS]

AFFECTED
A
PROPERTY

F.1 DEED

Grantor Signature:

WAUBEKA MILL, INC.

Name: Jacquelyn M. Voeks

Title: President

DATED: 4/30/19

Waubeka Mill, Inc. Jacquelyn M Voeks 680 Emerald Pointe Drive Bldg 5 Condo 7 Hollister, Missouri, 65672

STATE OF Missouri) SS. COUNTY OF Toney)

The foregoing instrument was acknowledged before me on this 30 day of april, 2019, by Jacquelyn M. Voeks, as ______ of Waubeka Mill, Inc., on behalf of said entity.

Print Name: Carrie A Smith

Notary Public, State of Missouri

My Commission Expires: 12.05.2021

(NOTARY SEAL)

Drafted By:

Danny S. Tang Godfrey & Kahn, S.C.

20508215.2



No plat or certified survey map exists for the subject property. Therefore a county GIS map is being used.



SCALE: 1 = 100'



121 W Main St P.O. Box 994 Port Washington WI 53074 262-284-9411

Print Date: 6/12/2019

AFFECTED
A
PROPERTY

6.3 Verification of Zoning

Ozaukee County

Owner (s):

WAUBEKA DEVELOPMENT LLC

Mailing Address:

WAUBEKA DEVELOPMENT LLC

2331 CHURCH STREET

EVANSTON, IL 60202

Request Mailing Address Change

Tax Parcel ID Number: Tax District:

Status:

04-028-12-003.00 45006-Town of Fredonia Active

Alternate Tax Parcel Number: Acres:

0.3200

1-020-12-003.00 45000-10 wil of Fredoma

Description - Comments (Please see Documents tab below for related documents. For a complete legal description, see recorded document.):

1076872 COMM 831 FT N & 252 FT W OF SE COR SE SW TH SW 150 FT S 3 FT SW 175 FT N 32 FT NW'LY ALG RIVER 314 FT SE 46 FT POB 0.32 AC SEC 28 T 12 R 21

Location:

School District:

1945 - Northern Ozaukee School

Site Address (es): (Site address may not be verified and could be incorrect. DO NOT use the site address in lieu of legal description.)

W4132 MILL ST Fredonia, WI 53021

Tax Year: 2019

Click here for detailed assessment data. (square footage, year built, building type, etc)

Real Estate Assessments

Code Description Acres Land Value Improvement Value Total Value

2 Commercial 0.32 \$35,900

\$6,100

\$42,000

Total:

0.32 \$35,900

\$6,100

\$42,000

Estimated Fair Market Value:

-

Average Assessment Ratio:

* MFL and PFC values are not included in the total.



G.4 Signed Statement

WDNR BRRTS Case #: 03-46-183691

WDNR Site Name: Waubeka Mill

Geographic Information System (GIS) Registry of Closed Remediation Sites

In compliance with the revisions to the NR 700 rule series requiring certain closed sites to be listed on the Geographic Information System (GIS) Registry of Closed Remediation Sites (Registry) effective Nov., 2001, I have provided the following Information.

To the best of my knowledge the legal descriptions provided and attached to this statement are complete and accurate.

Responsible Party:

Environmental Consulting, Fuel System Design, Installation and Service

AFFECTED В PROPERTY

RIGHT-OF-WAY

Notification of Continuing Obligations and Residual Contamination C. I. Page

Form 4400-286 (9/15)

The affected property is:						
 the source property (the source of the had conducted the cleanup (a deeded proper 	zardous substance	discharge), but the pro	perty is	not owned by	y the per	rson who
conducted the cleanup (a deeded proper a deeded property affected by contamin	ty) ation from the source	e property				
a right-of-way (ROW)	ation from the source	e property				
a Department of Transportation (DOT) R	ow					
			rentumber of \$18	manifesta socialisment		SHELISID SERVICE BEAUTIST
Include this completed page as an attack	iment with all no	tifications provided	unde	r sections A	and B	
Contact Information						
Responsible Party: The person responsible cleanup is:	e for sending this f	orm, and for conducti	ng the	environmen	tal inves	stigation and
Responsible Party Name Waubeka Mill Inc						
Contact Person Last Name	First		MI	5,455		ude area code)
Voeks	Jacquelin			(20	52) 707-	
Address		City				ZIP Code
680 Emerald PT., Building 5, Condo 7		Hollister			MO	65672
E-mail jvoeks@gmail.com						
Name of Party Receiving Notification:						
Business Name, if applicable: Town of Fredor	ก่า					
Title Last Name			Ιмι	IPhone Numi	ber (incl	ude area code)
Mr. Eichner	Bob		''''	1	52) 692-	
Address	роо	City		(~)		ZIP Code
242 Fredonia Avenue P.O. Box 12		Fredonia			WI	53021
242 I Tedolila Avellue I .O. Box 12		Trouoma				
Site Name and Source Property Informat	ion:					
Site (Activity) Name Waubeka Mill		T-2			D. 1 1	71D O 1
Address		City				ZIP Code
W4132 Mill Street		Fredonia			WI	53021
DNR ID # (BRRTS#) 03-46-183691		(DATCP) ID#				
Contacts for Questions:					0.	
If you have any questions regarding the clear above, or contact:	nup or about this n	otification, please cor	itact th	ie Responsib	le Party	identified
Environmental Consultant: METCO	Te: .		I NAI	IDhana Numi	or (incl	ude area code)
Contact Person Last Name	First		MI)8) 781-	
Powell	Jason	IC:h:	_	(00		ZIP Code
Address		City			WI	54603
709 Gillette Street Suite 3		La Crosse			VVI	54005
E-mail jasonp@metcohq.com						
Department Contact:						
To review the Department's case file, or for qu	loctions on cleanu	ns or closure require	ments.	confact:		
Department of: Natural Resources (DNR)	destions on cicana	po or orocare require	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	0011111011		
		lo:w-			State In	ZIP Code
Address		City			WI	53073
1155 Pilgrim Parkway	Ir:4	Plymouth	М	I Dhone Mumb	100	ide area code)
Contact Person Last Name	First		IVII		0) 893-	
Delcore	Lee			1 (92	0,000	0021

E-mail (Firstname.Lastname@wisconsin.gov) lee.delcore@wisconsin.gov

6.B.

AFFECTED **B**PROPERTY

RIGHT-OF-WAY

Notification of Continuing Obligations and Residual Contamination
Form 4400-286 (9/15)

Section B: ROW Notification: Residual Contamination and/or Continuing Obligations - Non-DOT ROWs

KEEP THIS DOCUMENT WITH YOUR PROPERTY RECORDS

242 Fredonia Avenue P.O. Box 12 Fredonia, WI, 53021

Dear Mr. Eichner:

I am providing this notification to inform you of the location and extent of contamination remaining in a right-of-way for which you are responsible, and of certain long-term responsibilities (continuing obligations) for which town of Fredonia may become responsible. I investigated a release of:

petroleum

on W4132 Mill Street, Fredonia, WI, 53021 that has shown that contamination

has migrated into the right-of-way for which town of Fredonia

is responsible.

I have responded to the release, and will be requesting that the Department of Natural Resources (DNR) grant case closure. Closure means that the DNR will not be requiring any further investigation or cleanup action to be taken. However, continuing obligations may be imposed as a condition of closure approval.

You have 30 days to comment on the proposed closure request:

The DNR will not review my closure request for at least 30 days after the date of this letter. As an affected right-of-way holder, you have a right to contact the DNR to provide any technical information that you may have that indicates that closure should not be granted for this site. If you would like to submit any information to the DNR that is relevant to this closure request, you should mail that information to the DNR contact: 1155 Pilgrim Parkway, Plymouth, WI, 53073, or at lee.delcore@wisconsin.gov.

Residual Contamination:

Groundwater Contamination:

Groundwater contamination originated at the property located at: W4132 Mill Street, Fredonia, WI, 53021.

The levels of

Benzene, Ethylbenzene, Naphthalene, Toluene, Trimethylbenzenes, and Xylene.

contamination in the groundwater on your property are above the state groundwater enforcement standards found in ch. NR 140, Wis. Adm. Code.

Soil Contamination:

Soil contamination remains at:

ROW of Mill Street

The remaining contaminants include:

Benzene, Ethylbenzene, Naphthalene, Toluene, Trimethylbenzenes, and Xylene.

at levels which exceed the soil standards found in ch. NR 720, Wis. Adm. Code. The following steps have been taken to address any exposure to the remaining soil contamination.

Natural Attenuation.

If residual soil or groundwater contamination is likely to affect water collected in a pit/trench that requires dewatering, a general permit for Discharge of Contaminated Groundwater from Remedial Action Operations may be needed. If you or any other person plan to conduct utility or building construction for which dewatering will be necessary, you or that person must contact the DNR's Water Quality Program, and if necessary, apply for the necessary discharge permit. Additional information regarding discharge permits is available at http://dnr.wi.gov/topic/wastewater/GeneralPermits.html.

Continuing Obligations on the Right-of-Way (ROW): As part of the response actions, I am proposing that the following continuing obligations be used at the affected ROW. If my closure request is approved, you will be responsible for the following continuing obligations:

AFFECTED В PROPERTY

RIGHT-OF-WAY

Notification of Continuing Obligations and Residual Contamination Page 2 of -4

Form 4400-286 (9/15)

Residual Soil Contamination:

If soil is excavated from the areas with residual contamination, the right-of-way holder at the time of excavation will be responsible for the following:

- determine if contamination is present,
- determine whether the material would be considered solid or hazardous waste,
- ensure that any storage, treatment or disposal is in compliance with applicable statutes and rules. Contaminated soil may be managed in-place, in accordance with s. NR 718, Wis. Adm. Code, with prior Department approval.

The right-of-way holder needs 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 during excavation activities to prevent a health threat to humans from ingestion, inhalation or dermal contact.

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.

GIS Registry and Well Construction Requirements:

If this site is closed, all properties within the site boundaries where contamination remains, or where a continuing obligation is applied, will be listed on the Bureau for Remediation and Redevelopment Tracking System (BRRTS) on the Web, at http://dnr.wi.gov/topic/Brownfields/clean.html. Inclusion on this database provides public notice of remaining contamination and of any continuing obligations. Documents can be viewed on this database, and include final closure letters, site maps and any applicable maintenance plans. The location of the site may also be viewed on the Remediation and Redevelopment Sites Map (RR Sites Map), on the "GIS Registry" layer, at the same internet address listed above.

DNR approval prior to well construction or reconstruction is required for all sites included in the GIS Registry, in accordance with s. NR 812.09 (4) (w), Wis. Adm. Code. This requirement applies to private drinking water wells and high capacity wells. Special well construction standards may be necessary to protect the well from the remaining contamination. Well drillers need to first obtain approval from a regional water supply specialist in DNR's Drinking Water and Groundwater Program. The well construction application, form 3300-254, is on the internet at http://dnr.wi.gov/topic/wells/documents/3300254.pdf.

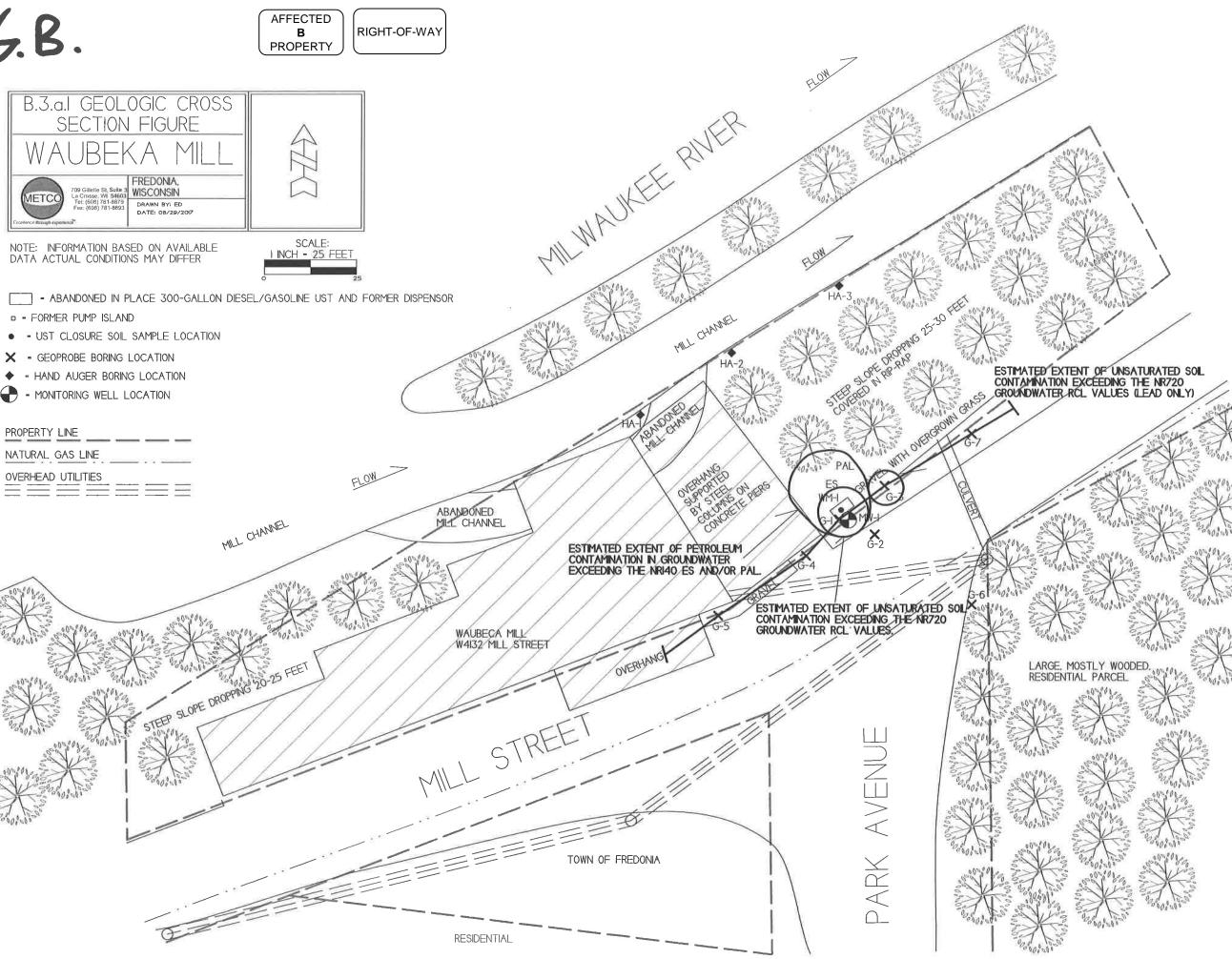
If you have any questions regarding this notification, I can be reached at: (608) 781-8879 jasonp@metcohq.com

Signature of responsible party/environmental consultant for the responsible party	Date Signed /
Thuld 5.16h	7/10/19
	1.1.

Attachments

Contact Information

Legal Description for each Parcel:



AFFECTED
B
PROPERTY

RIGHT-OF-WAY

6.B.

20 T 2 T 2 T 2 T 2 T 2 T 2 T 2 T 2 T 2 T	3 W 2 S	2000				
SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON	COMPLETE THIS SECTION ON DELIVERY				
 Complete items 1, 2, and 3. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. Town of Fredonia Bob Eichner P.O. Box 12, 242 Fredonia Ave. Fredonia, WI 53021 	A. Signature X. Check Fifth B. Received by (Printed Name) Charg Gorfan D. Is delivery address different fror If YES, enter delivery address					
9590 9403 0958 5223 6284 01 2 Article Number (Transfer from service label) 7015 1660 0000 4342 8933	3. Service Type Adult Signature Adult Signature Restricted Delivery Certified Mall® Certified Mail Restricted Delivery Collect on Delivery Collect on Delivery Insured Mail Insured Mail Restricted Delivery (over \$500)	□ Priority Mail Express® □ Registered Mail™ □ Registered Mail Restricte Delivery □ Return Receipt for Merchandise □ Signature Confirmation™ □ Restricted Delivery				
PS,Form 3811, July 2015 PSN 7530-02-000-9053	C. C	Somestic Return Receipt				

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

AFFECTED
B
PROPERTY

Preston D. Cole, Secretary
Telephone 608-266-2621
Toll Free 1-888-936-7463
TTY Access via relay - 711

Tony Evers, Governor



RIGHT-OF-WAY

December 20, 2019

Mr. Bob Eichner 242 Fredonia Ave. Fredonia, WI 53021

SUBJECT: Notice of Closure Approval with Continuing Obligations for Rights-of-Way Holders for

W4132 Mill St., Fredonia, WI

Final Case Closure for Waubeka Mill Inc W4132 Mill Street, Fredonia, WI 53021 BRRTS #: 03-46-183691, FID #: 246147110

Dear Mr. Eichner:

The Department of Natural Resources (DNR) recently approved the completion of environmental work at the Waubeka Mill Inc. site. This letter describes how that approval applies to the right-of-way (ROW) for Mill Street at W4132 Mill St., Fredonia, WI 53021. As the right-of-way holder, you are responsible for complying with these continuing obligations for any work you conduct in the right-of-way.

State law directs parties responsible for environmental contamination to take actions to restore the environment and minimize harmful effects. The law allows some contamination to remain in soil and groundwater if it does not pose a threat to public health, safety, welfare or to the environment.

On July 15, 2019, you received information from METCO about the petroleum contamination in the ROW from W4132 Mill St., Fredonia, WI 53021 and about the continuing obligations. Continuing obligations are meant to limit exposure to any remaining contamination.

Applicable Continuing Obligations

The continuing obligations that apply to this right-of-way are described below, and are consistent with Wis. Stat. § 292.12, and Wis. Admin. § NR 700 series.

- Groundwater contamination is present at or above ch. NR 140, Wis. Adm. Code enforcement standards.
- Residual soil contamination exists that must be properly managed should it be excavated or removed.

Residual Groundwater Contamination (ch. NR 140, 812, Wis. Adm. Code)

Groundwater contamination greater than enforcement standards is present both on this contaminated property and off this contaminated property, as shown on Figure B.3.b. Groundwater Isoconcentration, dated August 29, 2017. If you intend to construct a new well, or reconstruct an existing well, you'll need prior DNR approval. This continuing obligation also applies to ROW holders for W4132 Mill St.



Residual Soil Contamination (ch. NR 718, chs. 500 to 536, Wis. Adm. Code or ch. 289, Wis. Stats.) Soil contamination remains on the northwestern quarter of the property near the former tank bed as indicated on Figure B.2.b. Residual Soil Contamination, dated August 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 ch. NR 718, Wis. Adm. Code, with prior DNR approval. This continuing obligation also applies to ROW holders for W4132 Mill St.

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.

Send all written notifications in accordance with these requirements to the letterhead address, to the attention of the Environmental Program Associate.

Additional Information

Additional information about this case is available at the DNR's Bureau for Remediation and Redevelopment Tracking System (BRRTS) on the Web (BOTW) at dnr.wi.gov and search "BOTW". Enter 03-46-183691 in the **Activity Number** field in the initial screen, then click on **Search**. Scroll down and click on the **CO Packet** link for information about the completion of the environmental work. The site may also be seen on the map view, RR Sites Map. RR Sites Map can be found online at dnr.wi.gov and search "WRRD".

Please contact Lee Delcore, the DNR project manager, at 920-893-8524 or lee.delcore@wisconsin.gov with any questions or concerns.

Sincerely,

Michele R. Norman.

Southeast Region Team Supervisor

Michele R. Norman

Remediation & Redevelopment Program

Attachments:

- Figure B.3.b. Groundwater Isoconcentration, dated August 29, 2017
- Figure B.2.b. Residual Soil Contamination, dated August 29, 2017

cc: Jacquelyn Voeks, 680 Emerald PT., Building 5, Condo 7, Hollister, MO 65672 Waubeka Development, LLC, C/O Charles Sheridan, 2331 Church St., Evanston, IL 60202 Ron Anderson, METCO, 709 Gillette St., Suite 3, La Crosse, WI 54603

