#### State of Wisconsin DEPARTMENT OF NATURAL RESOURCES 3911 Fish Hatchery Road Fitchburg WI 53711-5397

Tony Evers, Governor

Telephone 608-266-2621 Toll Free 1-888-936-7463 TTY Access via relay - 711



August 20, 2024

JoAnn Tomson N4946 County Highway WS Woodland, WI 53099

Via Electronic Mail Only to jtomson@wfastaffing.com

#### KEEP THIS LEGAL DOCUMENT WITH YOUR PROPERTY RECORDS

SUBJECT: Case Closure with Continuing Obligations Elsinger Property, N4946 County Highway WS, Woodland, WI 53099 BRRTS #: 03-14-219712

Dear JoAnn Tomson:

The Wisconsin Department of Natural Resources (DNR) is pleased to inform you that the Elsinger Property case identified above met the requirements of Wisconsin Administrative (Wis. Admin.) Code chs. NR 700 to 799 for case closure with continuing obligations (COs). COs are legal requirements to address potential exposure to remaining contamination. No further investigation or remediation is required at this time for the reported hazardous substance discharge and/or environmental pollution.

However, you, future property owners and occupants of the property must comply with the COs as explained in this letter, which may include maintaining certain features and notifying the DNR and obtaining approval before taking specific actions. You must provide this letter and all enclosures to anyone who purchases, rents or leases this property from you. Some COs also apply to rights of way (ROWs) affected by the contamination as identified in the Continuing Obligation Summary section of this letter. You may be required to make a real estate condition report disclosure under Wis. Stat. ch. 709.

This case closure decision is issued under Wis. Admin. Code chs. NR 700 to 799 and is based on information received by the DNR to date. The DNR reviewed the case closure request for compliance with state laws and standards and determined the case closure request met the notification requirements of Wis. Admin. Code ch. NR 725, the response action goals of Wis. Admin. Code § NR 726.05(4), and the case closure criteria of Wis. Admin. Code § NR 726.05(4), and the case closure criteria of Wis. Admin. Code § § NR 726.05, 726.09 and 726.11, and Wis. Admin. Code ch. NR 140.

The Elsinger site was investigated for a discharge of hazardous substances from the former underground storage tanks located on site, near the repair shop. Case closure is granted for the petroleum volatile organic compounds (PVOCs) that were associated with the hazardous substance discharge as documented in the case file. The site investigation and/or remedial action addressed soil, groundwater, and surface water. The remedial action consisted of the excavation of impacted soil west and north of the repair shop. Contamination remains in soil and groundwater.



The case closure decision and COs required were based on the current use of the site for residential purposes. The site is currently business/commercial. Based on the land use and zoning, the site meets the non-industrial land use classification under Wis. Admin. Code § NR 720.05(5) for application of residual contaminant levels in soil.

#### SUMMARY OF CONTINUING OBLIGATIONS

COs are applied at the following locations:

ADDRESS	COS APPLIED	DATE OF MAINTENANCE PLAN(S)
N4946 County Road WS, Iron Ridge, WI (Source Property)	<ul> <li>Soil contamination exceeds RCLs</li> <li>Cover (for soil to groundwater pathway)</li> <li>Structural Impediment (shop building)</li> <li>Groundwater contamination remains.</li> <li>Future vapor risk</li> <li>Monitoring well MW-1 was lost and not properly abandoned</li> </ul>	October 24, 2018
ROW County Highway WS	<ul> <li>Soil contamination equals or exceeds RCLs</li> <li>Groundwater contamination remains</li> </ul>	

#### **CLOSURE CONDITIONS**

Closure conditions are legally required conditions which include both COs and other requirements for case closure (Wis. Stat. § 292.12(2)). Under Wis. Stat. § 292.12(5), you, any subsequent property owners and occupants of the property must comply with the closure conditions as explained in this letter. The property owner must notify occupants for any condition specified in this letter under Wis. Admin. Code §§ NR 726.15(1)(b) and NR 727.05(2). If an occupant is responsible for maintenance of any closure condition specified in this letter, you and any subsequent property owner must include the condition in the lease agreement under Wis. Admin. Code § NR 727.05(3) and provide the maintenance plan to any occupant that is responsible.

DNR staff may conduct periodic pre-arranged inspections to ensure that the conditions included in this letter and the maintenance plan dated (10/24/2018) are met (Wis. Stat. § 292.11(8)). If these requirements are not followed, the DNR may take enforcement action under Wis. Stat. ch. 292 to ensure compliance with the closure conditions.

#### SOIL

#### Continuing Obligations to Address Soil Contamination

<u>Residual Soil Contamination (Wis. Admin. Code chs. NR 718, NR 500 to 599, and § NR 726.15(2)(b) and Wis.</u> Stat. ch. 289)

Soil contamination remains on the property as indicated on the enclosed map (Figure B.2.b., Residual Soil Impacts, 10/16/2018). If soil in the locations shown on the map 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. If sampling confirms that contamination is present, the property owner or right of way holder at the time of excavation will need to determine if the material is considered solid waste and ensure that any storage, treatment or disposal complies with applicable standards and rules. Contaminated soil may be managed under Wis. Admin. Code ch. NR 718 with prior DNR approval.

In addition, all current and future property owners, occupants and right of way holders need to be aware that excavation of the contaminated soil may pose an inhalation and direct contact hazard; special precautions may be needed to prevent a threat to human health.

Cover (for soil) (Wis. Stat. § 292.12(2)(a), Wis. Admin. Code §§ NR 724.13(1) and (2), NR 726.15(2)(d) and/or (e), NR 727.07(1))

The concrete cap, as shown on the enclosed map (Figure 1, Engineered Cap Barrier, 10/16/2018) shall be maintained in compliance with the enclosed maintenance plan, dated 10/24/2018. The purpose of the cover is to minimize the infiltration of water through contaminated soil that might otherwise pose a threat to human health.

To modify or replace a cover, the property owner must submit a request to the DNR under Wis. Admin. Code ch. NR 727. The DNR approval must be obtained before implementation. The replacement or modified cover must be a structure of similar permeability or be protective of the revised use of the property until contaminant levels no longer exceed Wis. Admin. Code ch. NR 720 groundwater pathway residual contaminant levels (RCLs).

Structural Impediment (Wis. Stat. § 292.12(2)(b), Wis. Admin. Code §§ NR 726.15(2)(f), NR 727.07(2)) The remaining Repair Shop as shown on the enclosed map (Figure B.2.b., Residual Soil Impacts, 10/16/2018) made complete site investigation and remediation of the contamination on this property impracticable. Upon removal of the structural impediment, the property owner shall investigate the degree and extent of PVOC contamination obstructed by the structural impediment. If contamination is found at that time, the property owner shall remediate the contamination in accordance with Wis. Admin. Code chs. NR 700 to 799.

#### GROUNDWATER

#### Continuing Obligations to Address Groundwater Contamination and/or Monitoring Wells

<u>Residual Groundwater Contamination</u> (Wis. Admin. Code ch. NR 140 and § NR 812.09(4)(w)) Groundwater contamination which equals or exceeds the enforcement standards for PVOCs is present, in the area of the Repair Shop, as shown on the enclosed map (Figure B.3.b., Residual Groundwater Impacts, 10/15/18). To construct a new well or reconstruct an existing well, the property owner must obtain prior DNR approval. Additional casing may be necessary to prevent contamination of the well.

## Monitoring Wells could not be Properly Filled and Sealed (Wis. Admin. Code ch. NR 141 and § NR 726.15(2)(c)1.)

Monitoring well MW-1 located on the source property, near the house, as shown on the enclosed map, (Figure B.3.d Monitoring Wells, 10/15/2018), could not be properly filled and sealed because it was missing. Your consultant made a reasonable effort to locate the well and to determine if it was properly filled and sealed. However, the well listed above was not located and remains open. You may be held liable under Wis. Stat. § 292.11 for any problems associated with the monitoring well if it creates a conduit for contaminants to enter groundwater. If the groundwater monitoring well is found, the owner of the property on which the well is located is required to properly fill and seal the well and submit the required documentation to the DNR.

#### VAPOR

#### Continuing Obligations to Address Vapor Contamination

Vapor intrusion (VI) is the movement of vapors coming from volatile chemicals in the soil or groundwater or within preferential pathways into buildings where people may breathe air contaminated by the vapors.

<u>VI - Future Concern</u>: (Wis. Stat. § 292.12(2), Wis. Admin. Code § NR 726.15(2)(L) or (m), as applicable. PVOCs remain in soil and groundwater at the subject property, as shown on the enclosed map, (Figure B.3.b., Residual Groundwater Impacts, 10/15/18 & Figure B.2.b., Residual Soil Impacts, 10/16/2018), at concentrations that may be of concern for vapor intrusion in the future, if a building is constructed, renovated or expanded in an area where no building currently exists or if an existing building is remodeled. At the time of closure three buildings were present a repair shop, a garage and a house.

Vapor control technologies are required for new construction or for modification of occupied buildings on the property unless the property owner assesses the vapor pathway and the DNR agrees that vapor control technologies are not needed. The property owner shall maintain the current building use and layout.

See the Other Closure Requirements section for more details.

#### **OTHER CLOSURE REQUIREMENTS**

Maintenance Plan and Inspection Log (Wis. Admin. Code §§ NR 726.11(2), NR 726.15(1)(d), NR 727.05(1)(b)3., Wis. Admin. Code § NR 716.14(2) for monitoring wells)

The property owner is required to comply with the enclosed maintenance plan dated 10/24/2018 for the cap and to conduct inspections twice a year, and to use the inspection log (DNR Form 4400-305) to document the required inspections. The maintenance plan and inspection log are to be kept up-to-date and on-site. The property owner shall submit the inspection log to the DNR only upon request, using the RR Program Submittal Portal. See the DNR Notification and Approval Requirements section below for more information on how to access the Submittal Portal.

The limitations on activities are identified in the enclosed maintenance plan(s). The following activities are prohibited on any portion of this property where the cover is required, without prior DNR approval:

- removal of the existing barrier;
- excavating or grading of the land surface;
- filling on capped or paved areas;
- plowing for agricultural cultivation;
- construction or placement of a building or other structure.

#### Pre-Approval Required for Well Construction (Wis. Admin. Code § NR 812.09(4)(w))

DNR approval is required before well construction or reconstruction for all sites identified as having residual contamination and/or COs. This requirement applies to private drinking water wells and high-capacity wells. To obtain approval, the property owner is required to complete and submit Form 3300-254, Continuing Obligations/Residual Contamination Well Approval Application, to the DNR Drinking and Groundwater program's regional water supply specialist. A well driller can help complete this form. The form can be obtained online at dnr.wi.gov, search "3300-254." Additional casing may be necessary to help prevent contamination of the well.

<u>General Wastewater Permits for Construction-related Dewatering Activities</u> (Wis. Admin. Code ch. NR 200) The DNR's Water Quality Program regulates point source discharges of contaminated water, including discharges to surface waters, storm sewers, pits, or to the ground surface. This includes discharges from construction-related dewatering activities, including utility work and building construction.

If the property owner or any other person plans to conduct such activities, that person must contact the Water Quality Program and, if necessary, apply for the required discharge permit. 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 water collecting in a pit/trench that requires dewatering is expected to be free of pollutants other than suspended solids, oil and grease, a general permit for pit/trench *Dewatering Operations* may be needed. Additional information can be obtained by visiting the DNR website at "dnr.wi.gov," search "wastewater general permits."

#### DNR NOTIFICATION AND APPROVAL REQUIREMENTS

Certain activities are limited at closed sites to maintain protectiveness to human health and the environment. The property owner is required to notify the DNR at least 45 days before and obtain approval from the DNR prior to taking the following actions (Wis. Admin. Code §§ NR 727.07, NR 726.15 (2), Wis. Stat. § 292.12(6)).

- Before removing a cover or any portion of a cover
- Before removing a structural impediment
- Before constructing a building and/or modifying use of or the construction of an existing building or changing property use. Certain activities are limited at closed sites to reduce the risk of exposure to residual contamination via vapor intrusion. For properties with a continuing obligation for addressing the future risk of vapor intrusion when buildings exist at the time of closure approval, changes to the current building use and layout are prohibited without prior DNR approval. This includes any change in building construction, reconstruction or partial demolition. The DNR may require additional actions may be required at that time to re-assess for vapor intrusion and mitigate, as appropriate.

The DNR may require additional investigation and/or cleanup actions if necessary, to be protective of human health and the environment. The case may be reopened under Wis. Admin. Code § NR 727.13 if additional information indicates that contamination on or from the site poses a threat, or for a lack of compliance with a CO or closure requirement. Compliance with the maintenance plan is considered when evaluating the reopening criteria.

#### SUBMITTALS AND CONTACT INFORMATION

Site, case-related information and DNR contacts can be found online in the Bureau for Remediation and Redevelopment Tracking System (BRRTS) on the Web (BOTW); go to <u>dnr.wi.gov</u> and search "BOTW." Use the BRRTS ID # found at the top of this letter. The site can also be found on the map view, Remediation and Redevelopment Sites Map (RRSM) by searching "RRSM."

Send written notifications and inspection logs and monitoring well filling and sealing forms to the DNR using the RR Program Submittal Portal at dnr.wi.gov, search "RR submittal portal" (<u>https://dnr.wi.gov/topic/Brownfields/Submittal.html</u>). Questions on using this portal can be directed to the Project Manager below or to the environmental program associate (EPA) for the regional DNR office. Visit dnr.wi.gov, search "RR contacts" and select the EPA tab (https://dnr.wi.gov/topic/Brownfields/Contact.html).

#### CLOSING

The DNR appreciates your efforts to restore the environment at this site. If you have any questions regarding this this letter, please contact DNR project manager Caroline Rice at 608-219-2182 or caroline.rice@wisconsin.gov.

Sincerely,

Issac A. Ross South Central Region Team Supervisor Remediation & Redevelopment Program Fitchburg DNR Service Center, Fitchburg Wisconsin

Attachments: Figure B.3.b., Residual Groundwater Impacts, 10/15/18 Figure B.2.b., Residual Soil Impacts, 10/16/2018 Figure B.3.d Monitoring Wells, 10/15/2018 Attachment D, Maintenance Plan, 10/24/2018 Figure 1, Engineered Cap Barrier, 10/16/2018 Inspection Log (DNR Form 4400-305) Memorandum to File: Revisions to the Closure Package

Additional Resources:

The DNR fact sheets listed below can be obtained by visiting the DNR website at "dnr.wi.gov," search the DNR publication number. *Guidance for Electronic Submittals for the Remediation and Redevelopment Program* (RR-690) *Continuing Obligations for Environmental Protection* (RR-819) *Environmental Contamination and Your Real Estate* (RR-973) *Post-Closure Modifications: Changes to Property Conditions after a State-Approved Cleanup* (RR-987) *Using Natural Attenuation to Clean Up Contaminated Groundwater: What Landowners Should Know* (RR-671)

#### State of Wisconsin DEPARTMENT OF NATURAL RESOURCES 3911 Fish Hatchery Road Fitchburg WI 53711-5397

Tony Evers, Governor

Telephone 608-266-2621 Toll Free 1-888-936-7463 TTY Access via relay - 711



August 20, 2024

Mr. Brian Field Dodge County Highway Department 211 E. Center Street Juneau, Wisconsin 53039

SUBJECT: Notice of Closure Approval with Continuing Obligations for Rights-of-Way Holders at County Highway WS Case Closure for Elsinger Property, N4946 County Highway WS, Woodland, WI 53099 BRRTS #: 03-14-219712

Dear Mr. Brian Field:

The Wisconsin Department of Natural Resources (DNR) approved the completion of the response actions conducted at the site identified above (the Site). This letter describes how that approval applies to the right-of-way (ROW) at County Highway WS, adjacent to N4946 County Highway WS, WI 53099. As the ROW holder, Dodge County is responsible for complying with continuing obligations for any work you conduct in the ROW.

State law—Wisconsin Statute (Wis. Stat.) ch. 292— directs parties responsible for the discharge of a hazardous substance or environmental pollution to take necessary actions to restore the environment to the extent practicable and minimize harmful effects from the discharge to the air, lands or waters of this state. The law allows some contamination to remain in the environment if it does not pose a threat to public health, safety, welfare or the environment.

On November 16, 2018, you received information from Randy Rogness of BLS Environmental, about the petroleum volatile organic compound (PVOC) contamination from the Site remaining in the soil and groundwater ROW, and about the continuing obligations necessary to limit exposure to remaining contamination.

#### APPLICABLE CONTINUING OBLIGATIONS

The continuing obligations that apply to this ROW are described below and are consistent with Wis. Stat. § 292.12 and Wisconsin Administrative Code (Wis. Admin. Code) chs. NR 700 to 799.

<u>Residual Soil Contamination (Wis. Admin. Code chs. NR 718, NR 500 to 599, and § NR 726.15(2)(b) and Wis.</u> Stat. ch. 289)

Soil contamination remains on the property as indicated on the enclosed map (Figure B.2.b., Residual Soil Impacts, 10/16/2018). If soil in the locations shown on the map 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. If sampling confirms that contamination is present, the property owner or right of way holder at the time of excavation will need to determine if the material is considered solid waste and ensure that any storage, treatment or disposal complies with applicable standards and rules. Contaminated soil may be managed under Wis. Admin. Code ch. NR 718 with prior DNR approval.



In addition, all current and future property owners, occupants and right of way holders need to be aware that excavation of the contaminated soil may pose an inhalation and direct contact hazard; special precautions may be needed to prevent a threat to human health.

<u>Residual Groundwater Contamination</u> (Wis. Admin. Code ch. NR 140 and § NR 812.09(4)(w)) Groundwater contamination which equals or exceeds the enforcement standards for PVOCs is present, as shown on the enclosed map (Figure B.3.b., Residual Groundwater Impacts, 10/15/18). To construct a new well or reconstruct an existing well, the property owner must obtain prior DNR approval. Additional casing may be necessary to prevent contamination of the well.

#### **ADDITIONAL INFORMATION**

Site, case-related information and DNR contacts can be found online in the Bureau for Remediation and Redevelopment Tracking System (BRRTS) on the Web (BOTW); go to <u>dnr.wi.gov</u> and search "BOTW." Use the BRRTS ID # found at the top of this letter. The site can also be found on the map view, Remediation and Redevelopment Sites Map (RRSM) by searching "RRSM."

Send written notifications and inspection logs to the DNR using the RR Program Submittal Portal at dnr.wi.gov, search "RR submittal portal." Questions on using this portal can be directed to the Project Manager below or to the environmental program associate (EPA) for the regional DNR office. Visit dnr.wi.gov, search "RR contacts" and select the EPA tab.

If you have questions or concerns regarding this letter, please contact the DNR project manager, Caroline Rice, at (608) 219-2182 or caroline.rice@wisconsin.gov.

Sincerely,

Issac A. Ross South Central Region Team Supervisor Remediation & Redevelopment Program DNR Fitchburg Service Center, Fitchburg Wisconsin

Attachments: Figure B.3.b., Residual Groundwater Impacts, 10/15/18 Figure B.2.b., Residual Soil Impacts, 10/16/2018

cc: JoAnn Tomson





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#### ATTACHMENTS D.1/D.2/D.4

#### ENGINEERED CAP BARRIER MAINTENANCE PLAN

October 24, 2018

Property Located at:

Elsinger Property 4946 CTH WS Woodland, Wis. 53099

**Remediation and Redevelopment Site:** 

Elsinger Property 4946 CTH WS Woodland, Wis. 53099

WDNR BRRTS # 03-14-219712

Legal Description: SW 1/4, SW 1/4, Section 31, Township 11 North, Range 17 E

#### Introduction

This document is the Maintenance Plan for an asphalt cap barrier at the abovereferenced property (Property) in accordance with the requirements of s. NR 724.13(2), Wisconsin Administrative Code. The maintenance activities relate to the existing unpaved surfaces occupying the area over Petroleum Hydrocarbon impacted soil and groundwater on the Property. The Petroleum Hydrocarbon impacts originated on the above referenced Remediation and Redevelopment Site (R&R Site). The impacted soil contains the following compounds in excess of the NR 720 Soil Quality Standards:

Benzene Ethylbenzene Methyl-tert-butyl-ether Naphthalene Toluene Total Trimethylbenzene Xylene Lead

The impacted groundwater contains the following compounds in excess of the NR 140 Standards:

Lead Ethylbenzene Naphthalene Total Trimethylbenzene Benzene Methyl-tert-butyl-ether Toluene Xylene The location of the Barrier Cap to be maintained in accordance with this Maintenance Plan is presented in Exhibit A (Proposed Cap). The residual impacted soil is presented in Exhibit B, (Residual Direct Contact Soil Impacts and Residual GW Pathway Soil Impacts). Residual impacted soil concentrations are presented on Table 1 (Exhibit B).

The impacted groundwater is presented in Exhibit C (Residual Groundwater Impacts), with compound concentrations presented on Table 2.

#### **Engineered Cap Barrier Purpose**

The Engineered Cap Barrier over the impacted soil/groundwater will serve as a barrier to prevent direct human contact with residual soil impacts that might otherwise pose a threat to human health. This Engineered Cap will also act as an infiltration barrier to minimize future soil-to-groundwater contamination migration that would violate the groundwater standards in ch. NR 140, Wisconsin Administrative Code. The Barrier will consist of three (3) areas/materials, as described below:

#### **Repair Garage**

The existing Repair Garage and Concrete floor will serve as the barrier for the impacted soil located below the Garage. The floor will be cleaned and sealed to prevent spillage passing through cracks in the floor.

#### **Existing Concrete Driveway**

The existing Concrete Driveway will serve as the barrier for the impacted soil located below the Driveway area. The Driveway will be cleaned and sealed to prevent spillage passing through cracks in the floor.

#### **Asphalt Barrier**

An Asphalt Barrier shall be established and maintained over the Remedial Excavation Area. The Barrier shall be a minimum of three (3) inches thick in the area identified in Exhibit A. Based on the current and future use of the property, the barrier should function as intended unless disturbed.

#### **Annual Inspection**

The Engineered Cap overlying the impacted soil/groundwater and as depicted in Exhibit A will be inspected twice a year, normally in the spring after all snow and ice is gone and late-summer, for deterioration, cracks and other potential problems that can cause additional infiltration into or exposure to underlying

soils. The inspections will be performed to evaluate damage due to settling, exposure to the weather, wear from traffic, increasing age, and other factors.

Any area where underlying soils have become or are likely to become exposed, or large cracks in the Engineered Cap will be documented. A log of the inspections and any repairs will be maintained by the property owner and is included as Exhibit D, *"Barrier Inspection Log"*. The log will include recommendations for necessary repair of any areas where underlying soils are exposed. Once repairs are completed, they will be documented in the inspection log. Potential repair activities are presented in the next section.

A copy of the inspection log will be sent to the Wisconsin Department of Natural Resources ("WDNR") at least annually after every inspection, unless otherwise directed in the case closure letter.

#### **Maintenance Activities**

If problems are noted during the annual inspections or at any other time during the year, repairs will be scheduled as soon as practical. Repairs can include filling of cracks with tar or asphalt, cutting out and replacement of the damaged area, or placement of a sealer coat over the asphalt. In the event that necessary maintenance activities expose the underlying soil, the owner must inform maintenance workers of the direct contact exposure hazard and provide them with appropriate personal protection equipment ("PPE").

In the event that cutting out and replacement of the Asphalt Cap is required, all necessary precautions shall be undertaken to prevent exposure of the underlying soil. The owner must also sample any soil that is excavated from the site prior to disposal to ascertain if impacts remain. The soil must be treated, stored and disposed of by the owner in accordance with applicable local, state and federal law.

In the event the Asphalt Cap overlying the impacted soil is removed or replaced, the replacement barrier must be equally impervious. Any replacement barrier will be subject to the same maintenance and inspection guidelines as outlined in this Maintenance Plan unless indicated otherwise by the WDNR or its successor.

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

#### Amendment or Withdrawal of Maintenance Plan

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

Contact Information (October, 2018)

Property Owner and Operator:

Mr. Richard Elsinger 4946 CTH WS Woodland, Wis. 53099 (920) 469-2436

**R&R Site Owner and Operator:** 

Mr. Richard Elsinger 4946 CTH WS Woodland, Wis. 53099 (920) 469-2436

Consultant:

Randy Rogness BLS Environmental, Inc. W4877 Banon Road Watertown, Wisconsin 53098 (262) 690-6685

WDNR:

Mr. Erin Niemisto Wisconsin Department of Natural Resources Southcentral Region Remediation and Redevelopment Program 3911 Fish Hatchery Road Fitchburg, Wisconsin 53711 (608) 275-3209

## **EXHIBIT A**

**Engineered Cap Location** 



## EXHIBIT B

**Residual Impacted Soil Information** 



Sample Name				GP1	GP2	GP5	GP5	GP8	GP8	GP8	GP10
<b>Collection Date</b>				9/30/09	9/30/09	9/30/09	9/30/09	9/30/09	9/30/09	9/30/09	9/30/09
Depth (feet)				4	3	7	12	3	. 7	12	4
Parameter	units	NRT	720	UnSat	UnSat	Sat	Sat	UnSat	Sat	Sat	UnSat
		Direct Contact	Groundwater								
Lead	mg/kg	400	13.5	40	29.7	4.3	20.3	49.4	89	41.8	74.5
Benzene	mg/kg	1.49	0.0026	< 0.025	< 0.025	< 0.100	0.245	< 0.025	< 0.025	< 0.025	< 0.025
Ethylbenzene	mg/kg	7.47	0.785	< 0.025	0.046	2.69	1.32	< 0.025	< 0.025	0.414J	0.324J
Methyl-tert-butyl-ether	mg/kg	59.4	0.0135	< 0.025	< 0.025	< 0.100	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025
Naphthalene	mg/kg	5.15	0.3291	NS	NS	2.23	0.403	NS	NS	< 0.025	NS
Toluene	mg/kg	818	0.5536	< 0.025	< 0.025	0.257J	3.35	<0.025	0.375J	0.093	< 0.025
1,2,4-Trimethylbenzene	mg/kg	89.8	N STD	< 0.025	0.092	17.5	1.83	0.422J	0.156	0.082	0.169
1,3,5-Trimethylbenzene	mg/kg	182	N STD	< 0.025	< 0.025	4.76	4.82	< 0.025	< 0.025	< 0.025	0.065J
TMB (1,2,4 +1,3,5)	mg/kg	N STD	0.691	< 0.05	0.092	22.3	6.65	0.422J	0.156	0.082	0.169
Total Xylene	mg/kg	258	1.98	< 0.075	0.163J	10.1	5.59	< 0.075	0.104J	0.231	<0.167
Percent Moisture	%	N STD	N STD	9.5	15.8	10	17.6	9.9	8.7	17.6	12.8

Sample Name				GP10	GP10	EW-1	EW-2	EW-3	EW-4	EW-5	EW=6
<b>Collection Date</b>				9/30/09	9/30/09	7/16/12	7/16/12	7/17/12	7/17/12	7/18/12	7/18/12
Depth (feet)				9	12	7.5	7.5	7.5	7.5	7.5	7.5
Parameter	units	nits NR720			Sat						
		Direct Contact	Groundwater								
Lead	mg/kg	400	13.5	186	3.8	NS	NS	NS	NS	2.9	NS
Benzene	mg/kg	1.49	0.0026	2.17J	0.836	< 0.025	< 0.025	< 0.5	< 0.5	0.312	< 0.200
Ethylbenzene	mg/kg	7.5	0.785	78.8	2.07	0.157	0.139	11.8	12.1	11.2	8.5
Methyl-tert-butyl-ether	mg/kg	59.4	0.0135	<1.25	< 0.025	< 0.025	< 0.025	< 0.5	<0.5	< 0.312	< 0.200
Naphthalene	mg/kg	5.15	0.3291	18.7	0.606	NS	NS	NS	NS	11.3	NS
Toluene	mg/kg	818	0.5536	<1.25	< 0.025	0.044J	0.039J	4.93	4.80	5.73	5.47
1,2,4-Trimethylbenzene	mg/kg	89.8	N STD	345	7.3	1.120	0.820	82.9	86.9	61.6	3.27
1,3,5-Trimethylbenzene	mg/kg	182	N STD	106	1.32	0.235	0.163	26,8	27.0	21.4	11.2
TMB (1,2,4 +1,3,5)	mg/kg	N STD	0.691	451	8.62	1.360	0.983	109	114	83.0	14.5
Total Xylene	mg/kg	258	1.98	285	2.39	0.646	0.554	63.50	65.1	57.5	40.4
Percent Moisture	%	N STD	N STD	22.8	9.8	18.5	19.6	14.4	14.7	9.7	15.1

Sample Name				EW-7	EW-8	SEW-1	SEW-2	SW-1	SW-2	SW-3	SW-4
<b>Collection Date</b>				7/18/12	7/18/12	7/16/12	7/16/12	7/18/12	7/18/12	7/18/12	7/18/12
Depth (feet)				7.5	7.5	7.5	7.5	7.5	7.5	7.5	7.5
										AND AND AND	
Parameter	units	NR	720	Sat	Sat						
		Direct Contact	Groundwater								
Lead	mg/kg	400	13.5	NS	NS	6.9	NS	5.8	22	NS	7.4
Benzene	mg/kg	1.49	0.0026	< 0.250	0.134	0.0	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025
Ethylbenzene	mg/kg	7.5	0.785	10.7	0.201	< 0.071	0.092	0.456	0.124	0.116	0.342
Methyl-tert-butyl-ether	mg/kg	59.4	0.0135	< 0.250	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025
Naphthalene	mg/kg	5.15	0.3291	NS	NS	0.7	NS	1.5	NS	NS	0.893
Toluene	mg/kg	818	0.5536	5.80	0.625	< 0.025	< 0.025	0.063J	< 0.025	< 0.025	0.059J
1,2,4-Trimethylbenzene	mg/kg	89.8	N STD	4.77	0.969	0.822	1.09	2.40	0.912	0.921	1.52
1,3,5-Trimethylbenzene	mg/kg	182	N STD	16.0	0.282	0.318	0.532	0.606	0.333	0.300	0.507
TMB (1,2,4 +1,3,5)	mg/kg	N STD	0.691	20.8	1.15	1.14	1.62	3.01	1.24	1.22	2.03
Total Xylene	mg/kg	258	1.98	5.21	1.18	0.399	0.462	1.81	0.615	0.621	1.38
Percent Moisture	%	N STD	N STD	12.4	22.3	6.9	12.5	13.3	13.6	13.6	12.7
								M			
Sample Name				WW-1	WW-2	WW-3	WW-4	WW-5	WW-6	WW-7	WW-8
<b>Collection Date</b>				7/16/12	7/16/12	7/16/12	7/17/12	7/17/12	7/17/12	7/17/12	7/17/12
Depth (feet)				7.5	7.5	7.5	7.5	7.5	7.5	7.5	7.5
Parameter	units	NR	720	Sat	Sat						
A DER DERRY DER	( units)	Direct Contact	Groundwater	Unit	Sut		Uni	Dut	Gut	Out	Jul

Sample Name				WW-1	WW-2	WW-3	WW-4	WW-5	WW-6	WW-7	<u>WW-8</u>
<b>Collection Date</b>				7/16/12	7/16/12	7/16/12	7/17/12	7/17/12	7/17/12	7/17/12	7/17/12
Depth (feet)				7.5	7.5	7.5	7.5	7.5	7.5	7.5	7.5
Parameter	units	NR7	720	Sat							
		Direct Contact	Groundwater								
Lead	mg/kg	400	13.5	NS	NS	NS	NS	NS	NS	8.9	NS
Benzene	mg/kg	1.49	0.0026	< 0.200	< 0.125	< 0.200	< 0.200	<0.100	< 0.125	0.276J	< 0.100
Ethylbenzene	mg/kg	7.5	0.785	6.44	5.55	5.79	6.79	3.27	5.34	3.36	3.41
Methyl-tert-butyl-ether	mg/kg	59.4	0.0135	< 0.200	< 0.125	< 0.200	< 0.200	< 0.100	< 0.125	0.276J	< 0.100
Naphthalene	mg/kg	5.15	0.3291	NS	NS	NS	NS	NS	NS	2.83	NS
Toluene	mg/kg	818	0.5536	0.921	0.878	0.961	1.14	0.641	0.840	2.41	0.564
1,2,4-Trimethylbenzene	mg/kg	89.8	N STD	29.8	29.3	33.5	32.5	17.6	27.1	17.1	17.7
1,3,5-Trimethylbenzene	mg/kg	182	N STD	10.8	11.1	12.7	12.1	7.16	10.3	6.9	6.96
TMB (1,2,4 +1,3,5)	mg/kg	N STD	0.691	40.6	40.4	46.2	44.6	24.8	37.4	24	24.7
Total Xylene	mg/kg	258	1.98	32.0	27.3	28.2	33.4	15.5	26.6	11.8	16.7
Percent Moisture	%	N STD	N STD	8.3	23.1	23.6	19.3	17.3	17.6	14	14.4

Bold = Exceeds NR 720 Direct Contact standards Italic = Exceeds NR 720 Groundwater Pathway standatds UnSat/Sat = Unsaturated/Saturated

Sample Name				WW-9	WW-10	WW-11	WW-12	F-2	F-3	F-4	F-5
Collection Date				7/17/12	7/18/12	7/18/12	7/18/12	07/16/12	07/16/12	07/16/12	07/16/12
Depth (feet)				7.5	7.5	7.5	7.5	15	15	15	15
Parameter	units	NR7	20	Sat	Sat	Sat	Sat	Sat	Sat	Sat	Sat
		Direct Contact	Groundwater				State of State	13 Mar & 60			Railera
Lead	mg/kg	400	13.5	NS	NS	NS	NS	NS	NS	NS	NS
Benzene	mg/kg	1.49	0.0026	< 0.312	< 0.125	< 0.200	< 0.200	< 0.025	< 0.025	< 0.025	0.031J
Ethylbenzene	mg/kg	7.5	0.785	22.9	3.43	9.56	5.85	0.256	0.226	0.226	0.569
Methyl-tert-butyl-ether	mg/kg	59.4	0.0135	< 0.312	< 0.125	<0.200	< 0.200	< 0.025	< 0.025	< 0.025	< 0.025
Naphthalene	mg/kg	5.15	0.3291	NS	NS	NS	NS	NS	NS	NS	NS
Toluene	mg/kg	818	0.5536	21.3	1.81	5.92	2.97	0.145	0.12	0.12	0.174
1,2,4-Trimethylbenzene	mg/kg	89.8	N STD	66.2	15.2	37.6	23.6	0.603	0.582	0.599	0.272
1,3,5-Trimethylbenzene	mg/kg	182	N STD	23.9	6.47	13.5	9.37	0.181	0.172	0.175	0.079
TMB (1,2,4 +1,3,5)	mg/kg	N STD	0.691	90.1	21.7	51.1	33.0	0.784	0.754	0.774	0.351
Total Xylene	mg/kg	258	1.98	108	16.0	45.9	27.0	1.16	1.02	1.06	1.02
Percent Moisture	%	N STD	N STD	22.3	15.7	17.3	15.5	9.5	7.8	10.1	8.5

Sample Name				F-6	F-7	F-8	F-9	F-10	F-11	F-12	F-13
<b>Collection Date</b>				07/16/12	07/16/12	07/17/12	07/17/12	07/17/12	07/17/12	07/17/12	07/18/12
Depth (feet)			15	15	15	15	15	15	15	15	
Parameter	units	NR7	/20	Sat							
		Direct Contact	Groundwater								
Lead	mg/kg	400	13.5	3.3	NS	NS	NS	3.2	NS	NS	NS
Benzene	mg/kg	1.49	0.0026	<25.0	< 0.025	< 0.025	< 0.025	0.550	0.311	0.363	0.411
Ethylbenzene	mg/kg	7.5	0.785	0.219	0.813	0.814	0.249	0.565	0.609	0.658	0.582
Methyl-tert-butyl-ether	mg/kg	59.4	0.0135	<25.0	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025
Naphthalene	mg/kg	5.15	0.3291	0.048J	NS	NS	NS	< 0.025	NS	NS	NS
Toluene	mg/kg	818	0.5536	0.123	0.176	0.195	0.16	0.178	0.129	0.136	0.152
1,2,4-Trimethylbenzene	mg/kg	89.8	N STD	0.504	0.57	0.693	0.539	0.050J	0.085	0.166	0.072
1,3,5-Trimethylbenzene	mg/kg	182	N STD	0.15	0.144	0.169	0.162	< 0.025	< 0.025	0.046J	< 0.025
TMB (1,2,4 +1,3,5)	mg/kg	N STD	0.691	0.654	0.714	0.862	0.701	0.050J	0.085	0.166	0.072
Total Xylene	mg/kg	258	1.98	0.695	1.61	1.68	1.14	0.826	0.979	1.17	0.891
Percent Moisture	%	N STD	N STD	8.4	7.5	7.4	7.6	5.5	5.8	5.1	5.4

	the second se				
Sample Name				F-14	F-15
<b>Collection Date</b>				07/18/12	07/18/12
Depth (feet)				15	15
				The Barton	and a start of
Parameter	units	NR	720	Sat	Sat
	Call-sur s	Direct Contact	Groundwater	Mar Berk	ALLE STR
Lead	mg/kg	400	13.5	NS	NS
Benzene	mg/kg	1.49	0.0026	< 0.025	0.389
Ethylbenzene	mg/kg	7.5	0.785	0.266	0.41
Methyl-tert-butyl-ether	mg/kg	59.4	0.0135	< 0.025	<25.0
Naphthalene	mg/kg	5.15	0.3291	NS	NS
Toluene	mg/kg	818	0.5536	0.034J	0.124
1,2,4-Trimethylbenzene	mg/kg	89.8	N STD	0.512	0.282
1,3,5-Trimethylbenzene	mg/kg	182	N STD	0.135	0.074
TMB (1,2,4 +1,3,5)	mg/kg	N STD	0.691	0.647	0.356
Total Xylene	mg/kg	258	1.98	0.726	0.8
Percent Moisture	%	N STD	N STD	4.8	5.2

# EXHIBIT C

### **Residual Impacted Groundwater Information**



Table 2 Groundwater Analytical Results Elsinger Property, N4946 CTH WS, Woodland, Wi

Parameter	units	ES	PAL	Date	TB	MW-1	MW-2	MW-3	MW-4	MW-5	MW-6
Lead	ug/L	15	1.5	10/11/09	NS	2.61	<1.3	16.8	6.2J	<1.3	10.4
				1/27/10	NS	NS	NS	28.0	NS	NS	NS
				4/27/10	NS	NS	NS	28.1	NS	NS	NS
				12/23/10	- NS	NS	NS	NS	NS	NS	NS
				8/16/12	NS	NS	NS	NS	NS	NS	NS
				11/17/12	NS	NS	NS	24.7	NS	NS	NS
				3/22/13	NS	NS	NS	44.1	NS	NS	NS
				6/22/13	NS	NS	NS	20.0	NS	NS	NS
Cadmium	ug/L	5	0.5	10/11/09	NS	NS	NS	NS	NS	NS	NS
				1/27/10	NS	NS	NS	NS	NS	NS	NS
				4/27/10	NS	NS	NS	NS	NS	NS	NS
				12/23/10	NS	NS	NS	NS	NS	NS	NS
				8/16/12	NS	NS	NS	NS	NS	NS	NS
				11/17/12	NS	NS	NS	NS	NS	NS	NS
				3/22/13	NS	NS	NS	NS	NS	NS	NS
				6/22/13	NS	NS	NS	NS	NS	NS	NS
Benzene	ug/L	5	0.5	10/11/09	<0.41	<0.41	<0.41	1430	5590	<0.41	958
				1/27/10	< 0.39	<0.39	< 0.39	354	3710	< 0.39	234
				4/27/10	<0.39	<0.39	<0.39	1090	2420	67.4	200
				12/23/10	<0.39	<0.39	< 0.39	684	4980	< 0.39	206
				8/16/12	NS	NS	< 0.39	449	2130	<0.39	268
				11/17/12	<0.39	NS	<0.39	87.6	1590	< 0.39	118
				3/22/13	NS	NS	<0.39	738	2880	8.0	197
				6/22/13	NS	NS	<0.34	74.2	695	2.1	72.8
n-Butylbenzene	ug/L	N STD	NSTD	10/11/09	<0.93	<0.93	<0.93	87.5	<46.5	<0.93	10.6
				1/27/10	NS	NS	NS	NS	NS	NS	NS
				4/27/10	NS	NS	NS	NS	NS	NS	NS
				12/23/10	NS	NS	NS	NS	NS	NS	NS
				8/16/12	NS	NS	NS	NS	NS	NS	NS
				11/17/12	NS	NS	NS	NS	NS	NS	NS
				3/22/13	NS	NS	NS	NS	NS	NS	NS
				6/22/13	NS	NS	NS	NS	NS	NS	NS

#### Table 2 Groundwater Analytical Results Elsinger Property, N4946 CTH WS, Woodland, Wi

Parameter	units	ES	PAL	Date	ТВ	MW-1	MW-2	MW-3	MW-4	MW-5	MW-6
1.2-Dichloroethane	ug/L	5	0.5	10/11/09	< 0.36	<0.36	< 0.36	<18.0	<18.0	1.6	<3.6
				1/27/10	NS	NS	NS	NS	NS	NS	NS
		1		4/27/10	NS	NS	NS	NS	NS	NS	NS
				12/23/10	NS	NS	NS	NS	NS	NS	NS
				8/16/12	NS	NS	NS	NS	NS	NS	NS
				11/17/12	NS	NS	NS	NS	NS	NS	NS
				3/22/13	NS	NS	NS	NS	NS	NS	NS
				6/22/13	NS	NS	NS	NS	NS	NS	NS
Ethylbenzene	ug/L	700	140	10/11/09	<0.54	<0.54	<0.54	4710	2540	<0.54	1180
				1/27/10	<0.41	<0.41	<0.41	3310	3420	< 0.41	1200
				4/27/10	<0.41	<0.41	<0.41	3900	3900	2050	1100
				12/23/10	<0.41	< 0.41	< 0.41	3230	3150	< 0.41	643
				8/16/12	NS	NS	< 0.41	2130	1940	< 0.41	807
				11/17/12	< 0.41	NS	< 0.41	1860	1890	< 0.41	535
				3/22/13	NS	NS	< 0.41	2900	2010	< 0.41	712
				6/22/13	NS	NS	<0.34	1030	1270	< 0.34	413
Isopropylbenzene (cumene)	ug/L	N STD	NSTD	10/11/09	<0.59	<0.59	<0.59	161	38.4J	<0.59	54.5
				1/27/10	NS	NS	NS	NS	NS	NS	NS
				4/27/10	NS	NS	NS	NS	NS	NS	NS
				12/23/10	NS	NS	NS	NS	NS	NS	NS
				8/16/12	NS	NS	NS	NS	NS	NS	NS
				11/17/12	NS	NS	NS	NS	NS	NS	NS
				3/22/13	NS	NS	NS	NS	NS	NS	NS
				6/22/13	NS	NS	NS	NS	NS	NS	NS
p-Isopropyltoluene	ug/L	N STD	NSTD	10/11/09	<0.67	<0.67	<0.67	36.0J	<33.5	<0.67	6.7J
				1/27/10	NS	NS	NS	NS	NS	NS	NS
				4/27/10	NS	NS	NS	NS	NS	NS	NS
				12/23/10	NS	NS	NS	NS	NS	NS	NS
				8/16/12	NS	NS	NS	NS	NS	NS	NS
				11/17/12	NS	NS	NS	NS	NS	NS	NS
				3/22/13	NS	NS	NS	NS	NS	NS	NS
				6/22/13	NS	NS	NS	NS	NS	NS	NS

Table 2 Groundwater Analytical Results Elsinger Property, N4946 CTH WS, Woodland, Wi

Parameter	units	ES	PAL	Date	TB	MW-1	MW-2	MW-3	MW-4	MW-5	MW-6
Methyl-tert-butyl-ether	ug/L	60	12	10/11/09	<0.38	<0.61	<0.61	<30.5	35.6J	<0.61	31.4
				1/27/10	< 0.38	<0.38	<0.38	<19.0	<19.0	<0.38	15.6
				4/27/10	<0.38	<0.38	<0.38	<38.1	<38.1	0.89J	10.1
				12/23/10	<0.38	<0.38	<0.38	<19.0	<38.1	0.43J	11.9
				8/16/12	NS	NS	<0.38	<7.6	<3.8	<0.38	10
				11/17/12	< 0.38	NS	<0.38	<19.0	<15.2	<0.38	6.8
				3/22/13	NS	NS	< 0.38	<19.0	<15.2	< 0.38	8.9
				6/22/13	NS	NS	< 0.37	<18.6	<7.4	< 0.37	3.6J
Naphthalene	ug/L	100	10	10/11/09	<0.89	<0.89	<0.89	574	117J	<0.89	67.8
				1/27/10	NS	NS	NS	NS	NS	NS	NS
				4/27/10	<0.40	<0.40	<0.40	482	229	<0.40	172
				12/23/10	NS	NS	NS	NS	NS	NS	NS
				8/16/12	NS	NS	<0.40	435	258	<0.40	98.1
				11/17/12	<0.40	NS	<0.40	367	186	<0.40	19.6
				3/22/13	NS	NS	<0.40	453	301	0.67J	29.2
				6/22/13	NS	NS	< 0.37	264	155	< 0.37	10.2
n-Propylbenzene	ug/L	N STD	NSTD	10/11/09	<0.81	<0.81	<0.81	528	93.4	< 0.81	125
				1/27/10	NS	NS	NS	NS	NS	NS	NS
				4/27/10	NS	NS	NS	NS	NS	NS	NS
				12/23/10	NS	NS	NS	NS	NS	NS	NS
				8/16/12	NS	NS	NS	NS	NS	NS	NS
				11/17/12	NS	NS	NS	NS	NS	NS	NS
				3/22/13	NS	NS	NS	NS	NS	NS	NS
		-		6/22/13	NS	NS	NS	NS	NS	NS	NS
Toluene	ug/L	800	160	10/11/09	<0.67	<0.67	<0.67	11600	9260	<0.67	16.3
				1/27/10	<0.42	<0.42	<0.42	2910	14700	<0.42	10.1
	1			4/27/10	< 0.42	<0.42	<0.42	8750	10700	0.91	11.8
				12/23/10	<0.42	<0.42	<0.42	5120	14900	<0.42	10.7
				8/16/12	NS	NS	<0.42	3940	173	<0.42	5.7
				11/17/12	<0.42	NS	<0.42	718	1970	<0.42	2.5J
· · · · ·				3/22/13	NS	NS	<0.42	5750	1700	<0.42	3.3J
				6/22/13	NS	NS	< 0.34	662	395	<0.34	<1.7

Table 2Groundwater Analytical ResultsElsinger Property, N4946 CTH WS, Woodland, Wi

Parameter	units	ES	PAL	Date	ТВ	MW-1	MW-2	MW-3	MW-4	MW-5	MW-6
1.2.4-Trimethylbenzene	ua/L	N STD	N STD	10/11/09	<0.97	<0.97	<0.97	3850	788	< 0.97	600
				1/27/10	< 0.43	<0.43	<0.43	4270	1810	< 0.43	782
				4/27/10	<0.43	<0.43	<0.43	3570	1210	4.9	1340
				12/23/10	<0.43	< 0.43	< 0.43	3450	1600	< 0.43	423
				8/16/12	NS	NS	<0.43	3120	1280	< 0.43	514
				11/17/12	<0.43	NS	< 0.43	4090	1100	<0.43	209
				3/22/13	NS	NS	< 0.43	3920	1310	< 0.43	215
				6/22/13	NS	NS	<0.33	2480	881	<0.33	98.1
1,3,5-Trimethylbenzene	ug/L	N STD	N STD	10/11/09	<0.83	<0.83	<0.83	1010	198	<0.83	171
				1/27/10	<0.40	<0.40	<0.40	1180	476	< 0.40	318
				4/27/10	<0.40	<0.40	<0.40	1020	317	<0.40	308
				12/23/10	<0.40	<0.40	<0.40	901	409	<0.40	112
				8/16/12	NS	NS	<0.40	767	320	< 0.40	93.8
				11/17/12	<0.40	NS	<0.40	1080	284	<0.40	5.6
				3/22/13	NS	NS	< 0.40	1020	323	< 0.40	6.2
				6/22/13	NS	NS	<0.36	664	228	<0.36	<1.8
Total Trimethylbenzene	ug/L	480	96	10/11/09	<1.80	<1.80	<1.80	4860	986	<1.8	771
				1/27/10	<0.83	<0.83	<0.83	5450	2286	<0.83	1100
				4/27/10	<0.83	<0.83	<0.83	4590	1527	4.9	1648
				12/23/10	<0.83	<0.83	<0.83	4351	2009	<0.83	535
				8/16/12	NS	NS	<0.83	3887	1600	<0.83	608
				11/17/12	< 0.83	NS	<0.83	5170	1384	<0.83	214
				3/22/13	NS	NS	<0.83	4940	1633	<0.83	221
				6/22/13	NS	NS	<0.69	2144	1109	<0.69	98.1
m,p,& o-Xylene	ug/L	2000	400	10/11/09	<2.63	<2.63	<2.63	18790	7900	<1.63	1529
				1/27/10	<1.25	<1.25	<1.25	13080	13640	<1.25	1360
				4/27/10	<1.25	<1.25	<1.25	16530	8150	7.5	2167
				12/23/10	<1.25	<1.25	<1.25	13160	12200	<1.25	956
				8/16/12	NS	NS	<1.25	10330	7450	<1.25	583
				11/17/12	<1.25	NS	<1.25	8620	6060	<1.25	259
				3/22/13	NS	NS	<1.25	14330	6900	1.7	127
				6/22/13	NS	NS	<1.03	5140	3576	<1.03	70.8

# Table 2Groundwater Analytical ResultsElsinger Property, N4946 CTH WS, Woodland, Wi

Parameter	units	ES	PAL	Date	MW-1	MW-2	MW-3	MW-4	MW-5	MW-6
Acenaphthene	ug/L	N STD	N STD	10/11/09	<0.0048	<0.0048	0.58J	<0.46	<0.0047	<0.47
Acenaphthylene	ug/L	N STD	NSTD	10/11/09	<0.0038	< 0.0036	0.40J	< 0.37	< 0.0037	< 0.37
Anthracene	ug/L	3000	600	10/11/09	< 0.0060	<0.0058	<0.57	<0.58	0.0066J	<0.59
Benzo(a)anthracene	ug/L	N STD	NSTD	10/11/09	< 0.0038	0.0048	< 0.36	< 0.37	0.0078J	< 0.37
Benzo(a)pyrene	ug/L	0.2	0.02	10/11/09	< 0.0030	0.0062J	<0.29	<0.29	0.0071J	<0.29
Benzo(b)fluoranthene	ug/L	0.2	0.02	10/11/09	< 0.0036	0.0075J	< 0.34	< 0.35	0.0079J	< 0.35
Benzo(g,h,i)perylene	ug/L	N STD	NSTD	10/11/09	< 0.0050	0.011J	<0.48	<0.49	0.0091J	<0.50
Benzo(k)fluoranthene	ug/L	N STD	NSTD	10/11/09	< 0.0046	0.0061J	<0.44	<0.45	0.0053J	<0.45
Chrysene	ug/L	0.2	0.02	10/11/09	<0.0037	0.0079J	< 0.35	< 0.35	0.013J	< 0.36
Dibenz(a,h)anthracene	ug/L	N STD	NSTD	10/11/09	< 0.0034	0.0019J	< 0.32	< 0.33	< 0.0033	< 0.33
Fluoranthene	ug/L	400	80	10/11/09	< 0.0046	< 0.0044	<0.44	<0.45	0.0011J	<0.45
Flourene	ug/L	400	80	10/11/09	<0.0050	<0.0048	0.72J	<0.49	0.0083J	<0.49
Indeno(1,2,3-d)pyrene	ug/L	N STD	NSTD	10/11/09	< 0.0049	0.0093J	<0.47	<0.48	< 0.0049	<0.48
1-Methylnaphthalene	ug/L	N STD	NSTD	10/11/09	0.010J	0.011J	69.3	5.3	0.0082J	3.3J
2-Methylnaphthalene	ug/L	N STD	N STD	10/11/09	0.018J	0.042J	177	12.7	0.022J	2.1J
Naphthalene	ug/L	100	10	10/11/09	0.049J	0.096	640	133	0.036J	18.9
Phenanthrene	ug/L	N STD	N STD	10/11/09	<0.0085	0.0088J	0.84J	<0.82	0.013J	<0.83
Pyrene	ug/L	250	50	10/11/09	<0.0050	0.0062J	<0.47	<0.48	0.012J	<0.49

Table 2Groundwater Analytical ResultsElsinger Property, N4946 CTH WS, Woodland, Wi

Parameter	units	ES	PAL	Date	MW-7	MW-8	MW-9	MW-10	MW-6A	MW-3A
Lead	ug/L	15	1.5	10/11/09	NI	NI	NI	NI	NS	NS
				1/27/10	NI	NI	NI	NI	NS	NS
				4/27/10	NI	NI	NI	NI	NS	NS
				12/23/10	<1.4	<1.4	<1.4	3.6J	NS	NS
				8/16/12	NS	NS	NS	NS	NS	NS
				11/17/12	NS	NS	NS	NS	NS	NS
				3/22/13	NS	NS	NS	NS	NS	NS
				6/22/13	NS	NS	NS	NS	NS	NS
Cadmium	ug/L	5	0.5	10/11/09	NI	NI	NI	NI	NS	NS
				1/27/10	NI	NI	NI	NI	NS	NS
				4/27/10	NI	NI	NI	NI	NS	NS
				12/23/10	0.33J	0.29J	0.33J	0.76J	NS	NS
				8/16/12	NS	NS	NS	NS	NS	NS
				11/17/12	NS	NS	NS	NS	NS	NS
				3/22/13	NS	NS	NS	NS	NS	NS
				6/22/13	NS	NS	NS	NS	NS	NS
Benzene	ug/L	5	0.5	10/11/09	NI	NI	NI	NI	994	NS
				1/27/10	N	NI	NI	NI	NS	359
				4/27/10	NI	NI	NI	NI	NS	1170
				12/23/10	1.4	< 0.39	1.3	2810	NS	NS
				12/23/10	<0.39	< 0.39	1.3	NS	NS	NS
				11/17/12	< 0.39	< 0.39	< 0.39	NS	NS	NS
				3/22/13	< 0.39	< 0.39	< 0.39	NS	NS	NS
				6/22/13	< 0.34	< 0.34	<0.34	NS	NS	NS
n-Butylbenzene	ug/L	N STD	N STD	10/11/09	NI	NI	NI	NI	12.2	NS
				1/27/10	NI	NI	ŇI	NI	NS	NS
				4/27/10	NI	NI	NÏ	NI	NS	NS
				12/23/10	NS	NS	NS	NS	NS	NS
				8/16/12	NS	NS	NS	NS	NS	NS
				11/17/12	NS	NS	NS	NS	NS	NS
				3/22/13	NS	NS	NS	NS	NS	NS
				6/22/13	NS	NS	NS	NS	NS	NS

Table 2Groundwater Analytical ResultsElsinger Property, N4946 CTH WS, Woodland, Wi

Parameter	units	ES	PAL	Date	MW-7	MW-8	MW-9	MW-10	MW-6A	MW-3A
1,2-Dichloroethane	ug/L	5	0.5	10/11/09	NI	NI	NI	NI	<1.8	NS
				1/27/10	NI	NI	NI	NI	NS	NS
			*	4/27/10	NI	NI	NI	NI	NS	NS
				12/23/10	NS	NS	NS	NS	NS	NS
				8/16/12	NS	NS	NS	NS	NS	NS
				11/17/12	NS	NS	NS	NS	NS	NS
				3/22/13	NS	NS	NS	NS	NS	NS
				6/22/13	NS	NS	NS	NS	NS	NS
Ethylbenzene	ug/L	700	140	10/11/09	NI	NI	NI	NI	1180	3390
				1/27/10	NI	NI	NI	NI	NS	3390
				4/27/10	NI	NI	NI	NI	NS	3980
				12/23/10	<0.41	<0.41	0.54J	2120	NS	NS
				12/23/10	<0.41	<0.41	< 0.41	NS	NS	NS
				11/17/12	<0.41	<0.41	<0.41	NS	NS	NS
				3/22/13	<0.41	<0.41	<0.41	NS	NS	NS
C				6/22/13	< 0.34	<0.34	<0.34	NS	NS	NS
Isopropylbenzene (cumene)	ug/L	N STD	N STD	10/11/09	NI	NI	NI	NI	56.9	NS
				1/27/10	NI	NI	NI	NI	NS	NS
				4/27/10	NI	NI	NI	NI	NS	NS
				12/23/10	NS	NS	NS	NS	NS	NS
				8/16/12	NS	NS	NS	NS	NS	NS
				11/17/12	NS	NS	NS	NS	NS	NS
				3/22/13	NS	NS	NS	NS	NS	NS
				6/22/13	NS	NS	NS	NS	NS	NS
p-lsopropyltoluene	ug/L	N STD	N STD	10/11/09	NI	NI	NI	NI	6.8	NS
				1/27/10	NI	NI	NI	NI	NS	NS
				4/27/10	NI	NI	NI	NI	NS	NS
				12/23/10	NS	NS	NS	NS	NS	NS
				8/16/12	NS	NS	NS	NS	NS	NS
				11/17/12	NS	NS	NS	NS	NS	NS
				3/22/13	NS	NS	NS	NS	NS	NS
				6/22/13	NS	NS	NS	NS	NS	NS

Table 2Groundwater Analytical ResultsElsinger Property, N4946 CTH WS, Woodland, Wi

Parameter	units	ES	PAL	Date	MW-7	MW-8	MW-9	MW-10	MW-6A	MW-3A
Methyl-tert-butyl-ether	ug/L	60	12	10/11/09	NI	NI	NI	NI	<4.4	NS
				1/27/10	NI	NI	NI	NI	NS	NS
				4/27/10	NI	NI	NI	NI	NS	NS
				12/23/10	0.98J	< 0.38	< 0.38	<19.0	NS	NS
				8/16/12	<0.38	<0.38	<0.38	NS	NS	NS
				11/17/12	< 0.38	< 0.38	< 0.38	NS	NS	NS
				3/22/13	< 0.38	<0.38	<0.38	NS	NS	NS
				6/22/13	< 0.37	<0.37	< 0.37	NS	NS	NS
Naphthalene	ug/L	100	10	10/11/09	NI	NI	NI	NI	<2.4	NS
				1/27/10	NI	NI	NI	NI	NS	NS
				4/27/10	NI	NI	NI	NI	NS	453
				12/23/10	NS	NS	NS	NS	NS	NS
				8/16/12	<0.40	<0.40	<0.40	NS	NS	NS
				11/17/12	<0.40	<0.40	<0.40	NS	NS	NS
				3/22/13	<0.40	<0.40	<0.40	NS	NS	NS
			and the second second	6/22/13	< 0.37	<0.37	< 0.37	NS	NS	NS
n-Propylbenzene	ug/L	N STD	N STD	10/11/09	NI	NI	NI	NI	129	NS
				1/27/10	NI	NI	NI	NI	NS	NS
				4/27/10	NI	NI	NI	NI	NS	NS
				12/23/10	NS	NS	NS	NS	NS	NS
				8/16/12	NS	NS	NS	NS	NS	NS
				11/17/12	NS	NS	NS	NS	NS	NS
				3/22/13	NS	NS	NS	NS	NS	NS
				6/22/13	NS	NS	NS	NS	NS	NS
Toluene	ug/L	800	160	10/11/09	NI	NI	NI	NI	17.3	NS
				1/27/10	NI	NI	NI	NI	NS	2960
				4/27/10	NI	NI	NI	NI	NS	9190
				12/23/10	<0.42	<0.54	1.3	8880	NS	NS
				8/16/12	<0.42	<0.42	<0.42	NS	NS	NS
				11/17/12	<0.42	<0.42	<0.42	NS	NS	NS
				3/22/13	<0.42	<0.42	<0.42	NS	NS	NS
				6/22/13	< 0.34	<0.34	<0.34	NS	NS	NS

Table 2 Groundwater Analytical Results Elsinger Property, N4946 CTH WS, Woodland, Wi

Parameter	units	ES	PAL	Date	MW-7	MW-8	MW-9	MW-10	MW-6A	MW-3A
1,2,4-Trimethylbenzene	ug/L	N STD	N STD	10/11/09	NI	NI	NI	NI	619	NS
				1/27/10	NI	NI	NI	NI	NS	4310
				4/27/10	NI	NI	NI	NI	NS	3530
				12/23/10	0.67J	<0.43	0.93J	1240	NS	NS
				8/16/12	<0.43	<0.43	<0.43	NS	NS	NS
				11/17/12	< 0.43	<0.43	< 0.43	NS	NS	NS
				3/22/13	<0.43	<0.43	< 0.43	NS	NS	NS
				6/22/13	< 0.33	< 0.33	< 0.33	NS	NS	NS
1,3,5-Trimethylbenzene	ug/L	N STD	NSTD	10/11/09	NI	NI	NI	NI	175	NS
				1/27/10	NI	NI	NI	NI	NS	1200
				4/27/10	NI	NI	NI	NI	NS	1010
				12/23/10	<0.40	<0.40	<0.40	320	NS	NS
				8/16/12	<0.40	< 0.40	<0.40	NS	NS	NS
				11/17/12	<0.40	< 0.40	<0.40	NS	NS	NS
				3/22/13	<0.40	<0.40	<0.40	NS	NS	NS
				6/22/13	< 0.36	< 0.36	< 0.36	NS	NS	NS
Total Trimethylbenzene	ug/L	480	96	10/11/09	NI	NI	NI	NI	894	NS
				1/27/10	NI	NI	NI	NI	NS	5510
				4/27/10	NI	NI	NI	NI	NS	4540
				12/23/10	0.67J	<0.83	0.93J	1560	NS	NS
				8/16/12	<0.83	<0.83	<0.83	NS	NS	NS
				11/17/12	< 0.83	<0.83	< 0.83	NS	NS	NS
				3/22/13	<0.83	<0.83	< 0.83	NS	NS	NS
				6/22/13	<0.69	<0.69	<0.69	NS	NS	NS
m,p,& o-Xylene	ug/L	2000	400	10/11/09	NI	NI	NI	NI	1546	NS
				1/27/10	NI	NI	NI	NI	NS	13350
				4/27/10	NI	NI	NI	NI	NS	16850
				12/23/10	0.94J	<1.25	1.78J	7700	NS	NS
				8/16/12	<1.25	<1.25	<1.25	NS	NS	NS
				11/17/12	<1.25	<1.25	<1.25	NS	NS	NS
				3/22/13	<1.25	<1.25	<1.25	NS	NS	NS
				6/22/13	<1.03	<1.03	<1.03	NS	NS	NS

## **EXHIBIT D**

**Barrier Inspection Log** 

State of Wisconsin Department of Natural Resources dnr.wi.gov

### **Continuing Obligations Inspection and Maintenance Log**

Form 4400-305 (2/14)

Page 1 of 2

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

Activity (Site	) Name				BRRTS No.		
Citgo Quil	Mart			<i>*</i>	03-4	1-557769	
Inspections	are required to be annual semi-a other	conducted (see closure a ly nnually · specify	ipproval letter):	When submittal of this form is required, submit manager. An electronic version of this filled out the following email address (see closure appro	the form electronica t form, or a scanned val letter):	Ily to the D version ma	ONR project ay be sent to
Inspection Date	Inspector Name	ltern	Describe the condition of the item that is being inspected	Recommendations for repair or mainte	Pri recomminance imple	evious nendations mented?	Photographs taken and attached?
		monitoring well cover/barrier vapor mitigation system other:			OY	() N	OYON
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03-41-557769 BRRTS No.	Citgo Quik Mart Activity (Site) Name			Continuing Obligation Form 4400-305 (2/14)	ations Inspection and Ma	Intenance Log Page 2 of 2
{Click to Add/Edi	t Image}	Date added:	{Click	to Add/Edit Image}	Date added:	
Title:			Title:			

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### ATTACHMENT D.3

### Photographs of Engineered Cap Barrier Area



Engineered Barrier Cap Area- Cap extends from roadway to the repair shop, and from the house (right) to Woodland Creek (just left of large trailer). The Engineered Barrier Cap would include the area between the repair shop and Woodland Creek for the length of the repair shop (left of repair shop, from front of repair shop to trees at rear of repair shop)

### CORRESPONDENCE/MEMORANDUM -

DATE:	7/5/2024	FILE REF: 03-14-219712
TO:	Elsinger Property File	
FROM:	Caroline Rice – Hydrogeologist	
SUBJECT:	Revisions to the Closure Package	

The Elsinger Property is located at N4946 CTH WS, Woodland, WI 53099. The Closure Packet was originally received by the Department of Natural Resources (DNR) in 2013, at that time fees had not been paid. In 2018 a lien was placed on the property in lieu of fees and a closure packet was resubmitted. In 2019 the site was reviewed for closure by the South-Central Region (SCR) Closure Committee. At that time, the Closure Committee conditionally approved of the request for case closure. The Closure Committee required revisions prior to issuing final case closure. DNR did not receive the requested revisions. On June 14, 2024, the SCR Closure Committee re-reviewed the case and decided to clarify the continuing obligations and the requested revisions in a memorandum to the file, then issue the Final Closure Letter.

This memorandum clarifies the continuing obligations and describes requested revisions.

#### Revisions for the 12/06/2018 Closure Review Request:

- Attachment E should note that: monitoring well MW-1 was lost in 2012, monitoring well MW-10 was removed during remedial activities, and all other monitoring wells were abandoned in 2014.
- B.3.D Monitoring Well Location Map should note the status of the monitoring well (i.e., abandoned, lost, to be abandoned).
- The signature block on page 12 of the Closure Review Request is not compliant with current requirements.
- Figure B.2.B., Residual Soil Impacts, illustrates a "Direct Contact Area". Based upon the data provided in the closure package this is incorrect. Sample results have not demonstrated that residual soil contamination concentrations at the site exceed the residual contaminant levels (RCLs) for direct contact.
- The cap area extends from the roadway eastward to the repair shop and from the house to north of the repair shop. The cap does not extend across County Highway WS. The attached figure shows the area of the cap.
- Continuing Obligation Table (Table 5) should be updated to reflect the below continuing obligations.

ADDRESS	COS APPLIED	DATE OF MAINTENANCE PLAN(S)
N4946 County Road WS, Iron Ridge, WI (Source Property)	<ul> <li>Soil contamination exceeds RCLs</li> <li>Cover (for soil to groundwater pathway)</li> <li>Structural Impediment (shop building)</li> <li>Groundwater contamination remains.</li> <li>Future vapor risk</li> <li>Monitoring well MW-1 was lost and not properly abandoned</li> </ul>	October 24, 2018

#### **Continuing Obligations:**



roundwater contamination remains