



February 9, 2015

Mr. Justin Wroblewski
Business Banking Officer
The Stephenson National Bank and Trust
P.O. Box 137
Marinette, WI 54143-0137

BRRTS No. 07-38231425
FID No: 430816480

Subject: Liability Clarification Letter Concerning Environmental Liability for
610 Main St., Goodman, Marinette County, Wisconsin
BRRTS No. 02-38-000498 & 03-38-443242
BRRTS Site Name: American Graphics, Inc.

Dear Mr. Wroblewski:

Purpose

The purpose of this letter is to provide you with clarifications regarding the environmental liability that a lender and a purchaser may have for a property located at 610 Main St., Goodman, Wisconsin ("the Property"). The legal description of the Property is attached. According to County Land Records the Property is owned by Thomas Teckam and is designated as parcel number 012-02335.003. The Department of Natural Resources ("the Department") has agreed to provide you with a letter clarifying the environmental liability associated with contaminants detected at the Property and respond to your specific concerns.

Request

On December 1, 2014 Mr. Torrey Adams, the purchaser ("Purchaser") requested on your behalf that the Department provide a summary of completed and required investigation and remedial activities at the Property and address the environmental liability that both a lender and a purchaser of the Property may have related to any existing contamination at the Property.

Specifically, the Purchaser asked that the Department address the following:

1. A summary of investigative and remedial activities that have been performed at the Property.
2. A summary of activities, if any, that will need to be performed at the Property in the future as it relates to the open Environmental Repair Program (ERP) case. What work remains related to investigation or remedial action or vapor intrusion assessment/mitigation?
3. What will be the liability of The Stephenson National Bank & Trust should it acquire Property?
4. What will be the liability of a potential buyer who may purchase the Property as it relates to the open ERP case?

5. Who is responsible to pay for additional remedial work at the Property as it relates to the open ERP case? Will the Department pay for the additional project needs to get it to where the case closure is possible? Who is responsible to submit the final case closure forms and the WDNR fees?
6. What type of restrictions does the Department of Natural Resources have with respect to expansion or additional construction on the Property?
7. Has there been any vapor screening, sub-slab, indoor or outdoor air testing performed at the Property?
8. If so what were the results and what is the Departments opinion on whether vapor mitigation systems are needed in buildings at the Property?
9. What is the status of the ERP case? What is needed to move the case to no further action status?
10. What future liability will a new owner have regarding the closed LUST case and the open ERP once it is closed?

The Department received the \$700 fee for providing assistance on December 1, 2014, as required by s. NR 749.04(1), Wis. Adm. Code.

Summary of Environmental Conditions:

American Graphics, Inc. (AGI) printed food, beverage, and household item labels at the Property between 1979 and 1993. Solvents were used for thinning ink and cleaning the presses. Used solvent was stored inside the building prior to being transported to a permitted disposal facility. Solvents and other chemicals were stored in 3 underground storage tanks (USTs) located in a courtyard in the eastern portion of the Property, between the former ink storage building and office building (Figure 1). Fuel oil for heating was stored in a UST reportedly located within the footprint of the building east of the solvent USTs. A discharge from the solvent USTs was reported to the Department in August 1991 and assigned the Environmental Repair Program (ERP) Bureau of Remediation and Redevelopment Tracking System (BRRTS) number 02-38-000498. A release from the heating oil UST was reported to the Department in September 2001 and was assigned the Leaking Underground Storage Tank (LUST) BRRTS number 03-38-443242. This case was closed July 20, 2009.

Closed LUST BRRTS No. 03-38-443242: Thomas Machine: A 1,000 gallon fuel oil UST used for heating was removed from the Property in September 2001 by Environmental Assessments, on behalf of the Property owner, Thomas Machine. The exact location of this UST is not known, however, it was likely located within the footprint of the northeastern-most building which was expanded around the time of the UST removal (Figure 1). During the UST removal, approximately 2.5 cubic yards of contaminated soil were removed from the excavation and stockpiled on-site.

In October 2001, one soil sample was collected from the stockpiled soil and soil samples were collected from 3 geoprobe borings installed around the excavation area. The samples were submitted for laboratory analysis of diesel range organics (DRO) and polynuclear aromatic hydrocarbons (PAHs).

DRO was detected in the sample from the soil pile in a concentration of 1,400 milligrams per kilogram (mg/Kg) DRO. PAHs were also detected in this sample, but concentrations were below ch. NR 720, Wis. Adm. Code residual soil cleanup levels (RSCLs). PAHs in the samples collected from the geoprobe borings were below detection limits (BDL). Based on this data, it appeared that the contaminated soils were excavated during UST removal.

A groundwater sample was not collected from the excavation; however, groundwater samples from nearby monitor wells installed as part of the ERP case were analyzed for petroleum volatile organic compounds (PVOCs). These results were BDL. On July 20, 2009 the Department of Commerce determined that no further environmental response action is necessary and closed the fuel oil LUST with no continuing obligations.

Open ERP BRRTS No. 02-38-000498: American Graphics Inc.: American Graphics, Inc. is an open ERP case in Goodman, Wisconsin involving solvent contamination. A discharge of ethyl acetate from a 3,000 gallon UST and two associated above grade storage drums at the Property was reported to the Department in August 1991.

The discharge occurred when, during a rainfall event, surface water runoff flowed into an opening in the ethyl acetate UST causing the tank contents to overflow onto the ground. When this occurred, the product/water mixture was pumped into two, open 250 gallon tanks. Contaminated water was then pumped from the open tanks into 10, 55-gallon drums and stored on-site at the south end of the former ink storage building.

In December 1992, AGI's consultant advanced 3 hand auger borings to between 4 and 5.5 ft below land surface (bls) adjacent to the ethyl acetate UST and in the drum storage area south of the former ink storage building to determine if a discharge had occurred. Soil analytical results indicated the chlorinated volatile organic compound (CVOC), 1,1,1-trichloroethane, was detected in soil near the solvent UST, but not in the drum storage area.

In November 1993, a Phase I/II Environmental Site Assessment was conducted at the Property by Associated Bank. Soil borings and 3 monitor wells were installed on-site downgradient of the UST's; soil and groundwater samples were submitted for laboratory analysis. Results confirmed the presence of volatile organic compounds (VOCs) and CVOCs in groundwater in excess of ch. NR 140, Wis. Adm. Code Enforcement Standards (ESs) and Preventive Action Levels (PALs). The contaminants identified in the groundwater included the VOCs benzene, toluene, and chloroform, and the CVOCs 1,1-dichloroethane (1,1-DCA), 1,2-dichloroethane (1,2-DCA), 1,1-dichloroethene (1,1-DCE), 1,1,1-trichloroethane (1,1,1-TCA), tetrachloroethylene (PCE) and trichloroethylene (TCE). Of these compounds, toluene, 1,1-DCA, 1,2-DCA, 1,1-DCE, 1,1,1-TCA and TCE exceeded the ch. NR 140, Wis. Adm. Code groundwater standards.

AGI was unable to complete the work necessary to investigate and remediate the Property. Therefore, the Department utilized state environmental cleanup funds to perform the remainder of the cleanup activities at the Property.

The Property is situated in an area of sand and silty sand underlain by Precambrian bedrock at depths approximately 100 ft below land surface (bls). Groundwater at the Property ranges in depth from 27 to 41 ft below land surface (bls) and generally flows to the east/northeast. Residents in Goodman obtain drinking water from the surficial sand aquifer; one of the town's public supply wells is located approximately ½ mile downgradient of the site. The purpose of the State-funded Site Investigation was to evaluate the potential impact of the VOCs and CVOCs to the Village of Goodman's municipal wells and nearby potable wells.

The State-funded investigation consisted of monitor well installation and sampling, soil sampling, and aquifer testing and occurred between August 1996 and January 1997. The results indicated minimal impact to unsaturated soils; however, the dissolved CVOC groundwater plume extended approximately 1,202 ft downgradient (to the east/northeast) of the Property. Downgradient migration appeared to be limited by the presence of Chemical Creek, located approximately 900 ft to the northeast, which acted as a barrier to groundwater flow, located ~900 ft to the northeast of the Property.

Sampling of downgradient potable wells and the municipal wells during the investigation and capture zone analysis indicated only a low potential for impact.

Between November 1999 and October 2008, State-funded, groundwater sampling was conducted that included monitoring wells, potable wells and the municipal wells. The data indicated improving groundwater quality with respect to the solvent discharge; the only compound that exceeded a Nr 140 Wis. Adm. Code PAL was 1,1,1-TCA at one well: MW-105, located 400 ft east/northeast of the solvent USTs.

In October 2008, a State-funded removal of the USTs and associated soil assessment was conducted. The results of this investigation confirmed the December 1992 soil sampling results; contaminated soils exist directly beneath the 3,000 gallon ethyl acetate UST. Detected compounds include toluene, PCE and 1,1,1-TCA in concentrations above ch. NR 720 Wis. Adm. Code groundwater protection (GWP) RSCLs but below ch. NR 720 Wis. Adm. Code direct contact SRSCSLs. Toluene was below the RSCLs.

In November 2013, one additional round of groundwater monitoring was conducted under Marinette County's Environmental Protection Agency (EPA) assessment grant for hazardous substance sites to evaluate if case closure was feasible at the Property. Only two compounds, dibromochloromethane and 1,1,1-TCA, were detected in samples collected on this occasion. The concentrations of both compounds were below the ch. NR 140 Wis. Adm. Code PAL.

Liability Clarification

This section will respond to the specific questions Mr. Adams provided and will clarify the Departments position on environmental liability associated with the Property. The following are the Departments responses:

(1) Summary of Investigation and remedial activities that have been performed at the Property.

A summary has been provided under the section "Summary of Environmental Conditions", above.

(2) A summary of activities, if any, that will need to be performed at the Property in the future as it relates to the open ERP Case. What work remains related to investigation or remedial action or vapor intrusion assessment/mitigation?

The original source of the impacts to soil and groundwater from VOCs and CVOCs was removed in 2008 when the 3 solvent USTs were excavated. The degree and extent of soil and groundwater contamination has been defined. Groundwater monitoring for this case has demonstrated that the dissolved plume has decreased to below ch. NR 140, Wis. Adm. Code, Preventative Action Limits and will likely continue to decrease due to natural attenuation. At this time, no additional soil sampling or groundwater monitoring is warranted.

Closure tasks include the preparation of the Case Closure – GIS Registry Package (Form 4400-202) including a cap maintenance plan signed by a licensed professional (in accordance with ch. NR 712, Wis. Adm. Code), and the submittal of the closure and GIS Registry fees.

(3) What will be the liability of The Stephenson National Bank & Trust should it acquire the Property.

Under Wisconsin's Hazardous Substance Spill Law (the "Spill Law"), Section 292.11, Wisconsin Statutes, a person who "possesses, controls or causes" a hazardous substance discharge, is liable for the cleanup. Section 292.21, Wis. Stats., provides a liability exemption for lenders and representatives. A lender is not subject to ss. 292.11(3), (4) or (7)(b) or (c), Wis. Stats., and is not liable under chapters 281, 285, 289 or 291 to 299, Wis. Stats., for a discharge of a hazardous substance that occurred on the Property, if the lender takes title, possession or control of the Property. Section 292.55(1)(d)1., Wis. Stats., authorizes the Department to issue letters concerning potential liability for environmental pollution.

The lender must meet the conditions in s. 292.21, Wis. Stats., to qualify for the liability exemption, including:

- The lender does not intentionally or negligently cause a new discharge of a hazardous substance or exacerbate an existing discharge.
- The lender notifies the Department of any known discharge of a hazardous substance.
- The lender conducts an environmental assessment of the Property not more than 90 days after the date the lender acquires title to, or possession or control of, the Property and files a complete copy of the environmental assessment with the Department not more than 180 days after the date the lender acquires title to, or possession or control of, the Property. The requirements for conducting an environmental assessment are found in s. 292.21 (1)(c) 2., Wis. Stats.

- If a discharge of a hazardous substance occurs on or after the date on which the lender acquires title to, or possession or control of, the Property, the lender implements an emergency action under s. NR 708.05, Wis. Adm. Code, in response to the discharge of the hazardous substance.
- For a hazardous substance discharged on or after the date on which the lender acquires title to, or possession or control of, the Property, the lender does not engage in the operation of a business at the Property, complete work in progress or take other actions associated with conducting the conclusion of the borrower's business (s. 292.21(1)(c)1., Wis. Stats.).
- The lender agrees to allow the Department and any party that possessed or controlled or caused the hazardous substance discharge, and their consultants or contractors, to enter the real Property to take action to respond to the discharge.
- The lender agrees to avoid any interference with action undertaken to respond to the discharge and to avoid actions that worsen the discharge.
- The lender agrees to any other condition that the Department determines is reasonable and necessary to ensure that the Department or another person can adequately respond to the discharge.

The Lender Liability Exemption is further explained in the enclosed fact sheet: "Environmental Liability Exemption for Lenders and Representatives (Publication # RR-508, October 2013)."

A lender liability exemption is not transferable to other parties or subsequent Property owners. Another future lender could apply for and receive a separate liability determination from the Department. A new owner who purchases the American Graphics Property from the bank would not be exempt under the lender liability exemption to the Spills Law.

(4) What will be the liability of a potential buyer who may purchase the Property as it relates to the open ERP Case?

The Spills Law, s. 292.11, Wis. Stats., also requires those who cause, possess or control a hazardous substance discharge to "take the actions necessary to restore the environment to the extent practicable and minimize the harmful effects from the discharge to the air, lands or waters of this state." This liability exists even if another person, such as a prior owner or tenant, caused the contamination. Section 292.55, Wis. Stats., authorizes the Department to issue letters concerning liability for environmental pollution.

When a purchaser acquires title to the Property, the purchaser could be held responsible for investigation and remedial actions necessary to respond to any hazardous substances discharge on the Property, even if the purchaser did not cause the discharges and did not own the Property when the discharges occurred. Whenever possible, the Department requires the person who causes the hazardous substance discharge to take the appropriate response action. However, if these persons cannot be located or unable to pay, the current owner of the Property is responsible for taking the appropriate actions.

However, in this case, the Department has committed to addressing the solvent contamination originating from the Property, to the extent it has resources available. The Department does not intend to require a new Property owner to assume the costs for any additional investigation or remediation of the 1991 solvent discharge. The Department's current plan is to use state funds to complete remaining work on the solvent contamination on the Property and affected off-site properties to the point of closure.

(5) Who is responsible to pay for additional remedial work at the Property as it relates to the open ERP Case? Will the Department pay for the additional project needs to get it to where case closure is possible? Who is responsible to submit the final case closure forms and WDNR fees?

Again, as stated in the response to Question No. 4, above, the Department has committed to completing the solvent investigation and clean-up to the point of closure and does not intend to require a new owner of the Property to assume these costs. The Department's current plan is to continue using state funds to complete the remaining site work to bring the case to the point of case closure, which includes well abandonment. Then, the Property owner would assume the tasks associated with closure including the preparation of the "Case Closure – GIS Registry Package" (Form 4400-202) by a licensed professional and the submittal of the closure and GIS Registry fees.

(6) What type of restrictions does the Department of Natural Resources have with respect to expansion or additional construction on the Property?

Until case closure is granted, the Department recommends that owners/developers discuss proposed actions and construction plans with the Department, to avoid causing a discharge to the environment or the creation of a hazard to public health, safety, and the environment. The Spill Law contains specific requirements for reporting new discharges and taking remedial actions if new discharges are caused, or existing conditions are exacerbated.

Depending on the amount and type of residual contamination remaining, closure approval for the Property may require the Property owner to follow continuing obligations for protection of human health or groundwater resources. As allowed in s. 292.12, Wis. Stats, continuing obligations for the Property will be detailed in the closure letter, which is issued by the Department at the time of case closure. Continuing obligations are legal requirements for which Property owners are responsible following a completed environmental cleanup. DNR fact sheet, RR-819, "Continuing Obligations for Environmental Protection" (attached) helps explain a Property owner's responsibility for continuing obligations on their Property. Common continuing obligations which may have an impact on future development include: maintenance of a cap over residual soil and/or groundwater contamination, management of contaminated soil that is excavated, proper disposal of dewatered groundwater, restrictions on potable well placement, and vapor mitigation systems.

Based on a review of this case file, continuing obligations that may likely be applied to this site after closure review relate to residual soil and groundwater contamination and several missing off-site groundwater monitor wells. Continuing obligations that may impact the future development of this site are described below.

Residual Soil Contamination: The closure letter will likely require that the existing soil over the area of the solvent USTs be maintained as a cap. Pre-approval from the Department will be required if the Property owner intends to modify the cap. In addition, if residual contaminated soil is excavated in the future, the Property owner 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 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 Department approval.

In addition, depending on site-specific conditions, construction over residual contaminated soils or groundwater may result in vapor migration of contaminants into enclosed structures or migration along newly placed underground utility lines. As a result, the closure letter will likely require that the potential for vapor inhalation and means of mitigation 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 Property.

Residual Groundwater Contamination: If the Property owner intends to construct or reconstruct a well on the Property, the Property owner will need to get Department approval in accordance with s. NR 812.09 (4) (w), Wis. Adm. Code. In addition, if construction related dewatering activities are required for future utility and building construction, the Property owner or person conducting the dewatering, must contact the DNR's Water Quality Program, and if necessary, apply for the necessary discharge permit(s).

Missing Monitor Wells: On-site monitoring well MW-102 and off-site monitoring wells MW-107, MW-108, and PZ-104, shown on the attached map, could not be located during the last several groundwater sampling events. These wells will be listed as a continuing obligation for the owner of the property on which each well is located. If any of the groundwater monitor wells are found, then the current owner of the property on which the well is located is required to: 1) notify the Department; 2) to properly fill and seal the wells; and 3) to submit the required documentation to the Department.

These continuing obligations and requirements for modifying them will be outlined in the closure letter for the ERP case. The closure letter and continuing obligations will transfer with the Property when that property is sold; new property owners are responsible for complying with the continuing obligations.

(7) Has there been any vapor screening, sub slab, indoor or outdoor air testing performed at the Property?

Vapor intrusion is the movement of vapors originating from volatile chemicals in the soil or groundwater, into buildings or other areas where people may become exposed by breathing air contaminated by the vapors. The Department's publication "Addressing Vapor Investigation at Remediation & Redevelopment Sites in Wisconsin" (PUB-RR-800, December 2010) provides guidance on how to screen for and investigate the vapor intrusion pathway at contaminated properties. Vapor intrusion pathway screening is used to determine whether or not the potential for vapor intrusion exists on or off a contaminated property. If vapor screening indicates the potential

for vapor intrusion exists, the next step is to conduct a vapor investigation which may include sub-slab, indoor and outdoor air testing.

Vapor Intrusion Pathway Screening was conducted at the open ERP case by the Department. The screening ruled out the potential for vapor intrusion at the property, based on its current zoning and land use. Specifically, groundwater contaminant concentrations have decreased to below levels that would prompt a vapor investigation. Therefore, no sub-slab, indoor, or outdoor air testing was conducted on the Property given the land use and zoning.

As discussed in the Summary of Environmental Conditions section of this letter, for the closed LUST case, the fuel oil UST was removed along with approximately 2.5 cubic yards of contaminated soil. The results of the soil and groundwater sampling conducted in the area of the UST indicated no residual petroleum contaminated groundwater or soil. As a result, the potential for vapors from the fuel oil LUST is unlikely; however, it was not evaluated. The Department would not recommend any additional action to evaluate vapors from the closed LUST.

(8) If so what were the results and what is the Departments opinion on whether vapor mitigation systems are needed in buildings at the Property?

Not Applicable.

(9) What is the status of the ERP case? What is needed to move the case to no further action status?

Please refer to the Department's response to Question No. 2, above.

(10) What future liability will a new owner have regarding the closed LUST case and the open ERP case once it is closed?

The State issues what is commonly referred to as a closure letter once the site investigation and cleanup have been completed. It indicates that the State has determined that no further environmental response action is necessary at the site, based upon the information available to the State at that time. The Department can only require further action to address a previously closed case if certain criteria are met, including if information regarding the site or facility conditions indicates that contamination on or from the site or facility poses a threat to public health, safety, welfare or the environment, or if the Property owner has not complied with the continuing obligations applied in the closure approval (s. NR 727.13, Wis. Adm. Code). Approximately 17,000 clean-up cases have been closed by the Department, but fewer than 50 have been reopened in the past 15 years.

Thus, before the Department can require further action to address residual contamination in existence at the time that the site (i.e., the area of contamination at the Property that was the subject of the closure letter) was closed, the Department must make a determination that information meets the reopening criteria and that further action is required. The responsibilities of the Property owner regarding residual contamination are described in the answer to Question 6.

“What cleanup responsibility does a purchaser of the Property have if contamination is subsequently discovered on or beneath the Property?”

If new contamination is discovered at the site that is not related to the closed LUST or ERP cases, a future Property owner should be aware that the DNR could impose the State’s hazardous substance spill law, s. 292.11, Wis. Stats., liability on anyone who possesses or controls contaminated Property where hazardous substances are continuing to discharge to the environment. This liability exists even if another person, such as a prior owner or tenant caused the contamination.

Whenever possible, the Department requires the person who caused the hazardous substance discharge to take the appropriate response actions. However, if these persons cannot be located or are unable to pay, the owner of the Property is responsible for taking the appropriate actions. The Department would only require the person in current possession or control of the Property to address that threat if the Department were unable to compel the person who caused the discharge to take the appropriate response action.

Please understand that this letter clarifies a lender’s and a new owner’s liability related to contamination on the Property based only on the information presently available to the Department. The Department has made no determination concerning the presence or absence of hazardous substance discharges other than those described above. In the future, if the Department becomes aware of new information concerning the contamination referenced above, or the presence of other contaminants on the Property not previously identified, the Department will need to evaluate that data to determine if response actions may be required.

The Bureau for Remediation and Redevelopment Tracking System (BRRTS) identification number for this activity is shown at the top of and within this letter. The Department tracks information on all determinations such as this in a Department database, “BRRTS on the Web,” that is available on the Internet at <http://dnr.wi.gov/topic/Brownfields/clean.html>.

The Department hopes that this letter helps clarify what known areas of residual contamination on the Property may require further environmental response action under Wisconsin law, and who is responsible for conducting these actions. If you have any questions please contact Elizabeth Victor at (920) 303-5424, by writing to the address at the top of this letter, or by email at elizabeth.victor@wisconsin.gov.

Sincerely,



Roxanne N. Chronert
Team Supervisor, Northeast Region
Remediation and Redevelopment Program

cc: Elizabeth Victor, P.G.
Torrey Adams, The Armstrong Creek Company
Bruce D. Meissner, Robert E. Lee & Associates, Inc.

Attachments:

- Legal Description
- Figure 1. Hand Auger Sampling Location Map (1/27/93, amended Jan 2015)
- Figure 2. Investigation Area Layout (12/16/97, amended Jan 2015)
- RR-508, October 2013 “Fact Sheet #5: “Environmental Liability Exemption for Lenders and Representatives”
- RR-819, November 2013 “Continuing Obligations for Environmental Protection”

2

STATE BAR OF WISCONSIN FORM 1 - 1999
WARRANTY DEED

Document Number

DOC. #: 656318

This Deed, made between FARMERS & MERCHANTS BANK & TRUST, a State Chartered Bank,

Recorded
OCT. 28, 2003 AT 01:34PM

MELANIE I HUENPFNER
MARINETTE COUNTY
REGISTER OF DEEDS

Fee Amount: \$13.00
Transfer fee: \$261.00

Grantor, and THOMAS TECKAM

Grantee,
Grantor, for a valuable consideration, conveys and warrants to Grantee the following described real estate in Marinette County, State of Wisconsin (if more space is needed, please attach addendum):

Recording Area 13

Name and Return Address

Thomas Teckam
N20759 Oneonta Dr.
Goodman, WI 52125
NTI-11083 Paul

SEE REVERSE SIDE FOR LEGAL DESCRIPTION.

261.00

012-02335.003

Parcel Identification Number (PIN)

This is not homestead property.
(is) (is not)

Together with all appurtenant rights, title and interests.

Grantor warrants that the title to the Property is good, indefeasible in fee simple and free and clear of encumbrances except

Subject to roadways, easements, restrictions, restrictive covenants, agreements and reservations of record, if any.

Dated this 9th day of October, 2003

FARMERS & MERCHANTS BANK & TRUST

Thomas Maxwell
* Thomas Maxwell, President

Michael Plasecki
* Michael Plasecki, Vice-President

AUTHENTICATION

Signature(s)

authenticated this _____ day of _____



ACKNOWLEDGMENT

STATE OF WISCONSIN)

) ss.

MARINETTE County)

Personally came before me this 9th day of October, 2003 the above named FARMERS & MERCHANTS BANK & TRUST, a State Chartered Bank, by Thomas Maxwell, President, and Michael Plasecki, Vice-President

to me known to be the person(s) who executed the foregoing instrument and acknowledged the same.

Budde F. Farez
BUDDE FIFAREK
Notary Public, State of Wisconsin

My Commission is permanent. (If not, state expiration date: 11/27, 2005)

TITLE: MEMBER STATE BAR OF WISCONSIN
(If not, _____
authorized by § 706.06, Wis. Stats.)

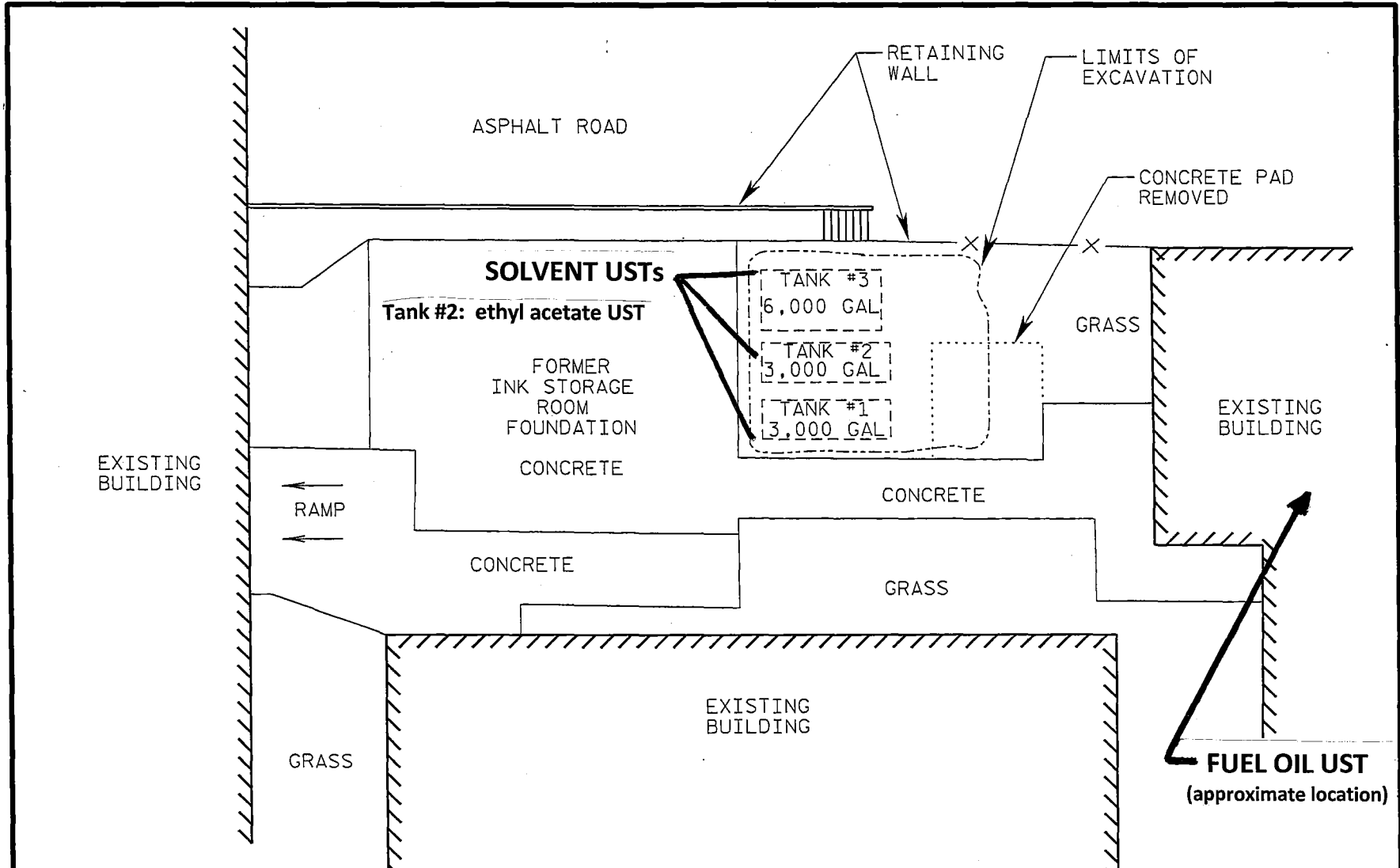
THIS INSTRUMENT WAS DRAFTED BY
Atty. Gerald L. Wilson (1014164)(ny)
Marinette, WI 54143 (BT - Farmers to Techem)

(Signatures may be authenticated or acknowledged. Both are not necessary.)

* Names of persons signing in any capacity must be typed or printed below their signature.

DOC. #: 656318

That part of Block Thirty-one (31), according to the recorded Plat of Goodman, in the Town of Goodman, Marinette County, Wisconsin described as: Beginning at the Southeast corner of said Block 31; thence North 87 deg. 31 min. 00 sec. West, 181.60 feet; thence North 2 deg. 51 min. 33 sec. East, 143.48 feet; thence South 87 deg. 02 min. 00 sec. East, 80.00 feet; thence North 83 deg. 30 min. 23 sec. East, 103.14 feet; thence South 2 deg. 55 min. 20 sec. West, 158.90 feet to the point of beginning.



AYRES
ASSOCIATES



MAPPING SOURCE:
AYRES ASSOCIATES
CADD FILES



10 0 20
GRAPHIC SCALE IN FEET

FIGURE 1

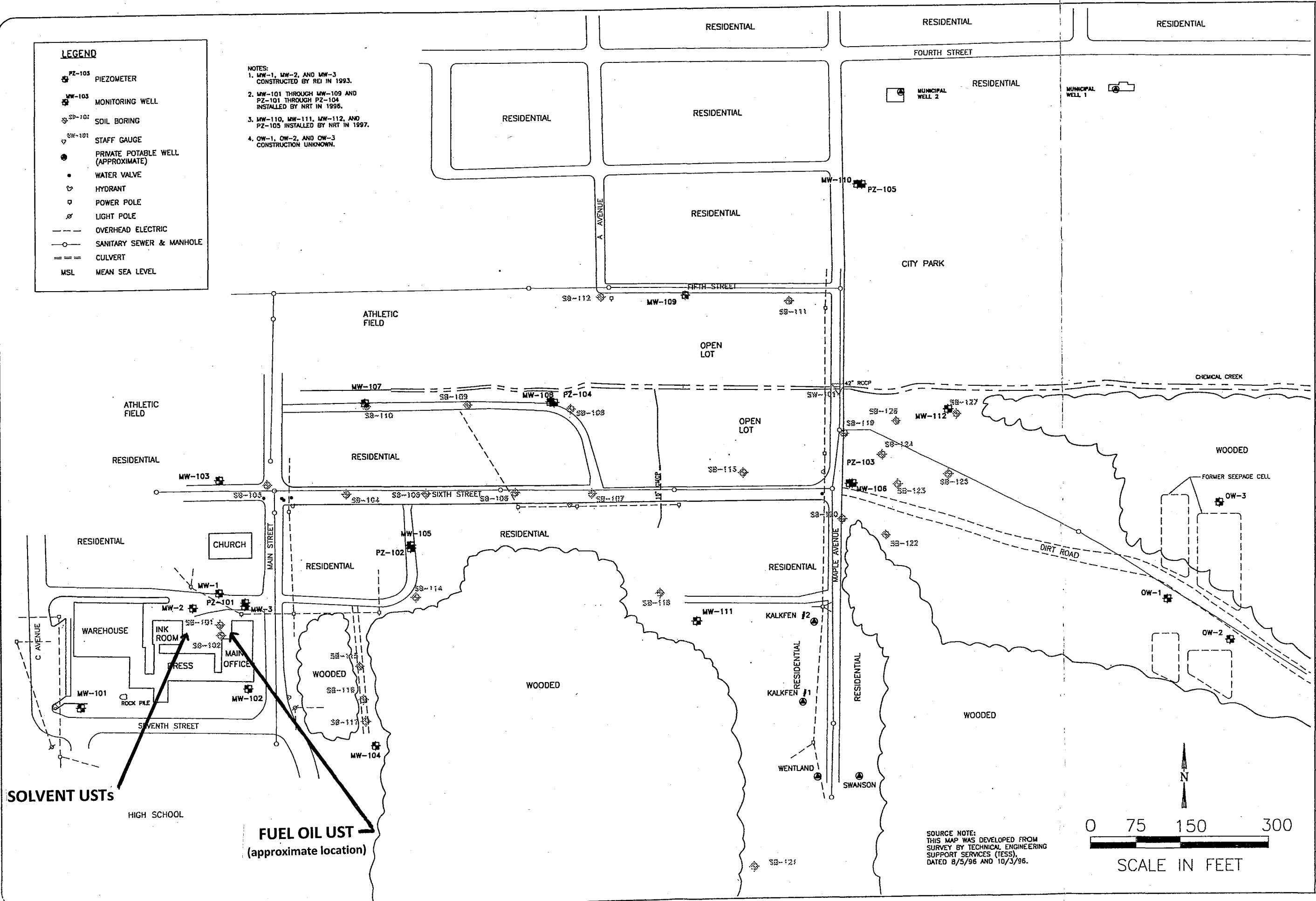
PROJECT LOCATION
FORMER AMERICAN
GRAPHICS, INC. FACILITY
610 MAIN STREET
GOODMAN, WISCONSIN

DATE: DEC 2008
JOB NUMBER: 53-0793.00

LEGEND

- ⊕ PZ-103 PIEZOMETER
- ⊕ MW-103 MONITORING WELL
- ⊕ SB-101 SOIL BORING
- ▽ SW-101 STAFF GAUGE
- PRIVATE POTABLE WELL (APPROXIMATE)
- WATER VALVE
- ⊕ HYDRANT
- ⊕ POWER POLE
- ⊕ LIGHT POLE
- - - OVERHEAD ELECTRIC
- - - SANITARY SEWER & MANHOLE
- === CULVERT
- MSL MEAN SEA LEVEL

- NOTES:**
1. MW-1, MW-2, AND MW-3 CONSTRUCTED BY REI IN 1993.
 2. MW-101 THROUGH MW-109 AND PZ-101 THROUGH PZ-104 INSTALLED BY NRT IN 1996.
 3. MW-110, MW-111, MW-112, AND PZ-105 INSTALLED BY NRT IN 1997.
 4. OW-1, OW-2, AND OW-3 CONSTRUCTION UNKNOWN.

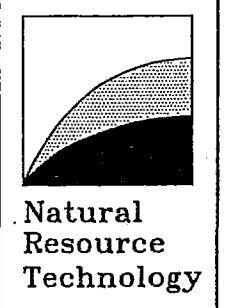


SOLVENT USTs

FUEL OIL UST
(approximate location)

DRAWN BY:	TAS	DATE:	12/16/97
CHECKED BY:	BSK	DATE:	02/03/98
APPROVED BY:	TEM	DATE:	2-3-98
AUTOCAD FILE: 1135-21.DWG			

INVESTIGATION AREA LAYOUT
 ADDITIONAL SITE INVESTIGATION
 FORMER AMERICAN GRAPHICS, INC. FACILITY
 610 MAIN STREET
 GOODMAN, WISCONSIN



PROJECT NO.	1135/7
DRAWING NO.	1135-B21
FIGURE NO.	2

SOURCE NOTE:
 THIS MAP WAS DEVELOPED FROM SURVEY BY TECHNICAL ENGINEERING SUPPORT SERVICES (TESS), DATED 8/5/96 AND 10/3/96.

