

From: [Ken Ebbott](#)
To: [DuFresne, Kristin I - DNR](#)
Subject: RE: Bay Towel
Date: Wednesday, April 05, 2017 11:30:18 AM
Attachments: [WDNR Form for Tech Assist Request.pdf](#)
[March 2017 TCLP boxes.pdf](#)
[March 2017 Total VOCs boxes.pdf](#)

Thanks Kristin -

I've asked Bay Towel to print out the attached form, and cut a check for \$700, and have someone deliver it to you. I know you can't issue any approval or information until you receive payment. I haven't heard back that they will do this, but I'll call if I don't

The table with all treated soil sample results is attached, as is a second table with all TCLP results.

Discussion of Activities

Recall we had Area I, Area K, and Area Q that were identified as soil that needed treatment before they could be discarded due to higher levels of PCE, primarily.

We treated them in December 2016 with Fenton's and BAM - a carbon amendment, and tested them after treatment a few times.

We then tested again in February 2017 and used some soil to evaluate further treatment chemistry options.

A plan was derived to add additional BAM, with a finer grind on the carbon plus amendments, and that was completed once the soil in the boxes thawed in late March 2017.

We resampled per the agreed upon methods - three samples from each of the 7 original boxes of soil, using a hand auger from a depth of about 3 feet in each 6' deep box. This generated 21 soil samples.

Soil from treatment areas I and K had already passed TCLP criteria prior to the retreatment in March, 2017, so no further TCLP testing was necessary on soil from those areas. Soil from Box Q exceeded the TCLP threshold level, so we obtained three samples of soil from the soil from Box Q after retreatment, and ran that for TCLP analysis.

Results

The soil chemistry tables show all 21 of the retreated samples from March 31, 2017 have total VOC values below the threshold values...below direct contact concentrations, and Land Disposal Restriction levels.

The TCLP soil chemistry table results show all samples from Areas I, K, and Q meet the TCLP criteria for characterization as a non-hazardous waste.

I'll call Bay Towel to verify they are cutting a check and delivering it - I assume you're in GB at the 2984 Shawano Ave office?

Thanks again for helping on this....!

Ken

KENDRICK EBBOTT | P.G. Branch Manager
Fehr Graham - Engineering & Environmental

From: DuFresne, Kristin I - DNR [mailto:Kristin.DuFresne@wisconsin.gov]
Sent: Wednesday, April 05, 2017 10:52 AM
To: Ken Ebbott <kebbott@fehr-graham.com>
Cc: DuFresne, Kristin I - DNR <Kristin.DuFresne@wisconsin.gov>
Subject: RE: Bay Towel

Ken – The waste determination fee is \$700. The RR program will be issuing the waste determination letter.

We are committed to service excellence.

Visit our survey at <http://dnr.wi.gov/customersurvey> to evaluate how I did.

Kristin DuFresne

Phone: (920) 662-5443

Kristin.dufresne@wisconsin.gov

From: Ken Ebbott [mailto:kebbott@fehr-graham.com]
Sent: Wednesday, April 05, 2017 9:44 AM
To: DuFresne, Kristin I - DNR
Subject: RE: Bay Towel

\$700, right?

KENDRICK EBBOTT | P.G. Branch Manager
Fehr Graham - Engineering & Environmental

From: DuFresne, Kristin I - DNR [mailto:Kristin.DuFresne@wisconsin.gov]
Sent: Wednesday, April 05, 2017 9:42 AM
To: Ken Ebbott <kebbott@fehr-graham.com>
Subject: RE: Bay Towel

We still require checks.

We are committed to service excellence.

Visit our survey at <http://dnr.wi.gov/customersurvey> to evaluate how I did.

Kristin DuFresne

Phone: (920) 662-5443

Kristin.dufresne@wisconsin.gov

From: Ken Ebbott [mailto:kebbott@fehr-graham.com]

Sent: Wednesday, April 05, 2017 9:37 AM
To: DuFresne, Kristin I - DNR
Subject: RE: Bay Towel

Working on the table-

How do you accept fees - does a credit card work? Or a check delivered to GB office?

Ken

KENDRICK EBBOTT | P.G. Branch Manager
Fehr Graham - Engineering & Environmental

From: DuFresne, Kristin I - DNR [<mailto:Kristin.DuFresne@wisconsin.gov>]
Sent: Wednesday, April 05, 2017 9:28 AM
To: Ken Ebbott <kebbott@fehr-graham.com>
Cc: DuFresne, Kristin I - DNR <Kristin.DuFresne@wisconsin.gov>
Subject: RE: Bay Towel

Ken – Please put the lab data into a table. I'll also need a technical assistance review fee.

We are committed to service excellence.

Visit our survey at <http://dnr.wi.gov/customersurvey> to evaluate how I did.

Kristin DuFresne

Phone: (920) 662-5443

Kristin.dufresne@wisconsin.gov

From: Ken Ebbott [<mailto:kebbott@fehr-graham.com>]
Sent: Wednesday, April 05, 2017 8:17 AM
To: DuFresne, Kristin I - DNR
Subject: Bay Towel

Kristin,

Just so you know, after we talked a couple weeks ago, I asked WMI several times what they need to accept the waste. They only got back to me last Thursday 3/30 that they need a Contained out Determination letter, and I was out of town at that point.

If they had told me of that need earlier, I'd have started this process a few weeks ago.

At that point, I figured I may as well see what the lab results are before proceeding. Now that we have the passing lab results - which is great - I need to get the paperwork to satisfy WMI.

Sorry for the hassle -

Ken

KENDRICK EBBOTT | P.G. Branch Manager

Fehr Graham - Engineering & Environmental

1237 Pilgrim Road
Plymouth, WI 53073
P: 920.892.2444
C: 920-980-4231
F: 920.892.2620
www.fehr-graham.com

Notice: Use this form to request a written response (on agency letterhead) from the Department of Natural Resources (DNR) regarding technical assistance, a post-closure change to a site, a specialized agreement or liability clarification for Property with known or suspected environmental contamination. A fee will be required as is authorized by s. 292.55, Wis. Stats., and NR 749, Wis. Adm. Code., unless noted in the instructions below. 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.].

Definitions

"Property" refers to the subject Property that is perceived to have been or has been impacted by the discharge of hazardous substances.

"Liability Clarification" refers to a written determination by the Department provided in response to a request made on this form. The response clarifies whether a person is or may become liable for the environmental contamination of a Property, as provided in s. 292.55, Wis. Stats.

"Technical Assistance" refers to the Department's assistance or comments on the planning and implementation of an environmental investigation or environmental cleanup on a Property in response to a request made on this form as provided in s. 292.55, Wis. Stats.

"Post-closure modification" refers to changes to Property boundaries and/or continuing obligations for Properties or sites that received closure letters for which continuing obligations have been applied or where contamination remains. Many, but not all, of these sites are included on the GIS Registry layer of RR Sites Map to provide public notice of residual contamination and continuing obligations.

Select the Correct Form

This form should be used to request the following from the DNR:

- Technical Assistance
- Liability Clarification
- Post-Closure Modifications
- Specialized Agreements (tax cancellation, negotiated agreements, etc.)

Do **not** use this form if one of the following applies:

- Request for an **off-site liability exemption or clarification** for Property that has been or is perceived to be contaminated by one or more hazardous substances that originated on another Property containing the source of the contamination. Use DNR's Off-Site Liability Exemption and Liability Clarification Application Form 4400-201.
- Submittal of an Environmental Assessment for the **Lender Liability Exemption**, s 292.21, Wis. Stats., **if no response or review by DNR is requested**. Use the Lender Liability Exemption Environmental Assessment Tracking Form 4400-196.
- Request for an **exemption to develop on a historic fill site** or licensed landfill. Use DNR's Form 4400-226 or 4400-226A.
- **Request for closure** for Property where the investigation and cleanup actions are completed. Use DNR's Case Closure - GIS Registry Form 4400-202.

All forms, publications and additional information are available on the internet at: dnr.wi.gov/topic/Brownfields/Pubs.html.

Instructions

1. Complete sections 1, 2, 6 and 7 for all requests. Be sure to provide adequate and complete information.
2. Select the type of assistance requested: Section 3 for technical assistance or post-closure modifications, Section 4 for a written determination or clarification of environmental liabilities; or Section 5 for a specialized agreement.
3. Include the fee payment that is listed in Section 3, 4, or 5, unless you are a "Voluntary Party" enrolled in the Voluntary Party Liability Exemption Program and the questions in Section 2 direct otherwise. Information on to whom and where to send the fee is found in Section 8 of this form.
4. Send the completed request, supporting materials and the fee to the appropriate DNR regional office where the Property is located. See the map on the last page of this form. A paper copy of the signed form and all reports and supporting materials shall be sent with an electronic copy of the form and supporting materials on a compact disk. For electronic document submittal requirements see: <http://dnr.wi.gov/files/PDF/pubs/r/RR690.pdf>

The time required for DNR's determination varies depending on the complexity of the site, and the clarity and completeness of the request and supporting documentation.

Technical Assistance, Environmental Liability Clarification or Post-Closure Modification Request

Form 4400-237 (R 9/15)

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Section 1. Contact and Recipient Information

Requester Information

This is the person requesting technical assistance or a post-closure modification review, that his or her liability be clarified or a specialized agreement and is identified as the requester in Section 7. DNR will address its response letter to this person.

Last Name	First	MI	Organization/ Business Name		
Ebbott	Kendrick	A	Fehr Graham Inc.		
Mailing Address			City	State	ZIP Code
1237 Pilgrim Road			Plymouth	WI	53073
Phone # (include area code)	Fax # (include area code)	Email			
(920) 892-2444	(920) 892-2620	kebbott@fehr-graham.com			

The requester listed above: (select all that apply)

- Is currently the owner
 Is considering selling the Property
 Is renting or leasing the Property
 Is considering acquiring the Property
 Is a lender with a mortgagee interest in the Property
 Other. Explain the status of the Property with respect to the applicant:

Environmental Consultant hired by the property owner

Contact Information (to be contacted with questions about this request)

Select if same as requester

Contact Last Name	First	MI	Organization/ Business Name		
Ebbott	Kendrick	A	Fehr Graham Inc.		
Mailing Address			City	State	ZIP Code
1237 Pilgrim Road			Plymouth	WI	53073
Phone # (include area code)	Fax # (include area code)	Email			
(920) 892-2444	(920) 892-2620	kebbott@fehr-graham.com			

Environmental Consultant (if applicable)

Contact Last Name	First	MI	Organization/ Business Name		
Ebbott	Kendrick	A	Fehr Graham Inc.		
Mailing Address			City	State	ZIP Code
1237 Pilgrim Road			Plymouth	WI	53073
Phone # (include area code)	Fax # (include area code)	Email			
(920) 892-2444	(920) 892-2620	kebbott@fehr-graham.com			

Attorney (if applicable)

Contact Last Name	First	MI	Organization/ Business Name		
Gallo	Donald		Husch Blackwell		
Mailing Address			City	State	ZIP Code
			Waukesha	WI	
Phone # (include area code)	Fax # (include area code)	Email			
(262) 956-6224		Donald.Gallo@huschblackwell.com			

Property Owner (if different from requester)

Contact Last Name	First	MI	Organization/ Business Name		
Butz	John		Bay Towel		
Mailing Address			City	State	ZIP Code
P.O. Box 12115			Ashwaubenon	WI	54304
Phone # (include area code)	Fax # (include area code)	Email			
(920) 497-2000		Jbutz@baytowel.com			

Technical Assistance, Environmental Liability Clarification or Post-Closure Modification Request

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Section 2. Property Information

Property Name Bay Towel		FID No. (if known) 405044090	
BRRTS No. (if known) 0205237064	Parcel Identification Number		
Street Address 501 S Adams Street	City Green Bay	State WI	ZIP Code 54301
County Brown	Municipality where the Property is located <input checked="" type="radio"/> City <input type="radio"/> Town <input type="radio"/> Village of Green Bay	Property is composed of: <input checked="" type="radio"/> Single tax parcel <input type="radio"/> Multiple tax parcels	Property Size Acres 2

1. Is a response needed by a specific date? (e.g., Property closing date) Note: Most requests are completed within 60 days. Please plan accordingly.

No Yes

Date requested by: 04/05/2017

Reason: **Reaching limit of regulatory allowed temporary storage of material at the site.**

2. Is the "Requester" enrolled as a Voluntary Party in the Voluntary Party Liability Exemption (VPLE) program?

No. **Include the fee that is required for your request in Section 3, 4 or 5.**

Yes. **Do not include a separate fee.** This request will be billed separately through the VPLE Program.

Fill out the information in Section 3, 4 or 5 which corresponds with the type of request:

Section 3. Technical Assistance or Post-Closure Modifications;

Section 4. Liability Clarification; or Section 5. Specialized Agreement.

Section 3. Request for Technical Assistance or Post-Closure Modification

Select the type of technical assistance requested: [Numbers in brackets are for WI DNR Use]

- No Further Action Letter (NFA) (Immediate Actions) - NR 708.09, [183] - **Include a fee of \$350.** Use for a written response to an immediate action after a discharge of a hazardous substance occurs. Generally, these are for a one-time spill event.
- Review of Site Investigation Work Plan - NR 716.09, [135] - **Include a fee of \$700.**
- Review of Site Investigation Report - NR 716.15, [137] - **Include a fee of \$1050.**
- Approval of a Site-Specific Soil Cleanup Standard - NR 720.10 or 12, [67] - **Include a fee of \$1050.**
- Review of a Remedial Action Options Report - NR 722.13, [143] - **Include a fee of \$1050.**
- Review of a Remedial Action Design Report - NR 724.09, [148] - **Include a fee of \$1050.**
- Review of a Remedial Action Documentation Report - NR 724.15, [152] - **Include a fee of \$350**
- Review of a Long-term Monitoring Plan - NR 724.17, [25] - **Include a fee of \$425.**
- Review of an Operation and Maintenance Plan - NR 724.13, [192] - **Include a fee of \$425.**

Other Technical Assistance - s. 292.55, Wis. Stats. [97] (For request to build on an abandoned landfill use Form 4400-226)

- Schedule a Technical Assistance Meeting - **Include a fee of \$700.**
- Hazardous Waste Determination - **Include a fee of \$700.**
- Other Technical Assistance - **Include a fee of \$700.** Explain your request in an attachment.

Post-Closure Modifications - NR 727, [181]

- Post-Closure Modifications: Modification to Property boundaries and/or continuing obligations of a closed site or Property; sites may be on the GIS Registry. This also includes removal of a site or Property from the GIS Registry. **Include a fee of \$1050, and:**
 - Include a fee of \$300 for sites with residual soil contamination; and
 - Include a fee of \$350 for sites with residual groundwater contamination, monitoring wells or for vapor intrusion continuing obligations.

Attach a description of the changes you are proposing, and documentation as to why the changes are needed (if the change to a Property, site or continuing obligation will result in revised maps, maintenance plans or photographs, those documents may be submitted later in the approval process, on a case-by-case basis).

**Technical Assistance, Environmental Liability
Clarification or Post-Closure Modification Request**

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Skip Sections 4 and 5 if the technical assistance you are requesting is listed above and complete Sections 6 and 7 of this form.

Section 4. Request for Liability Clarification

Select the type of liability clarification requested. Use the available space given or attach information, explanations, or specific questions that you need answered in DNR's reply. Complete Sections 6 and 7 of this form. **[Numbers in brackets are for DNR Use]**

"Lender" liability exemption clarification - s. 292.21, Wis. Stats. [686]

❖ **Include a fee of \$700.**

Provide the following documentation:

- (1) ownership status of the real Property, and/or the personal Property and fixtures;
- (2) an environmental assessment, in accordance with s. 292.21, Wis. Stats.;
- (3) the date the environmental assessment was conducted by the lender;
- (4) the date of the Property acquisition; for foreclosure actions, include a copy of the signed and dated court order confirming the sheriff's sale.
- (5) documentation showing how the Property was acquired and the steps followed under the appropriate state statutes.
- (6) a copy of the Property deed with the correct legal description; and,
- (7) the Lender Liability Exemption Environmental Assessment Tracking Form (Form 4400-196).
- (8) If no sampling was done, please provide reasoning as to why it was **not** conducted. Include this either in the accompanying environmental assessment or as an attachment to this form, and cite language in s. 292.21(1)(c)2., h.-i., Wis. Stats.:
 - h. The collection and analysis of representative samples of soil or other materials in the ground that are suspected of being contaminated based on observations made during a visual inspection of the real Property or based on aerial photographs, or other information available to the lender, including stained or discolored soil or other materials in the ground and including soil or materials in the ground in areas with dead or distressed vegetation. The collection and analysis shall identify contaminants in the soil or other materials in the ground and shall quantify concentrations.
 - i. The collection and analysis of representative samples of unknown wastes or potentially hazardous substances found on the real Property and the determination of concentrations of hazardous waste and hazardous substances found in tanks, drums or other containers or in piles or lagoons on the real Property.

"Representative" liability exemption clarification (e.g. trustees, receivers, etc.) - s. 292.21, Wis. Stats. [686]

❖ **Include a fee of \$700.**

Provide the following documentation:

- (1) ownership status of the Property;
- (2) the date of Property acquisition by the representative;
- (3) the means by which the Property was acquired;
- (4) documentation that the representative has no beneficial interest in any entity that owns, possesses, or controls the Property;
- (5) documentation that the representative has not caused any discharge of a hazardous substance on the Property; and
- (6) a copy of the Property deed with the correct legal description.

Clarification of local governmental unit (LGU) liability exemption at sites with: (select all that apply)

- hazardous substances spills - s. 292.11(9)(e), Wis. Stats. [649];
- Perceived environmental contamination - [649];
- hazardous waste - s. 292.24 (2), Wis. Stats. [649]; and/or
- solid waste - s. 292.23 (2), Wis. Stats. [649].

❖ **Include a fee of \$700, a summary of the environmental liability clarification being requested, and the following:**

- (1) clear supporting documentation showing the acquisition method used, and the steps followed under the appropriate state statute(s).
- (2) current and proposed ownership status of the Property;
- (3) date and means by which the Property was acquired by the LGU, where applicable;
- (4) a map and the ¼, ¼ section location of the Property;
- (5) summary of current uses of the Property;
- (6) intended or potential use(s) of the Property;
- (7) descriptions of other investigations that have taken place on the Property; and
- (8) (for solid waste clarifications) a summary of the license history of the facility.

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Section 4. Request for Liability Clarification (cont.)

Lease liability clarification - s. 292.55, Wis. Stats. [646]

❖ **Include a fee of \$700 for a single Property, or \$1400 for multiple Properties and the information listed below:**

- (1) a copy of the proposed lease;
- (2) the name of the current owner of the Property and the person who will lease the Property;
- (3) a description of the lease holder's association with any persons who have possession, control, or caused a discharge of a hazardous substance on the Property;
- (4) map(s) showing the Property location and any suspected or known sources of contamination detected on the Property;
- (5) a description of the intended use of the Property by the lease holder, with reference to the maps to indicate which areas will be used. Explain how the use will not interfere with any future investigation or cleanup at the Property; and
- (6) all reports or investigations (e.g. Phase I and Phase II Environmental Assessments and/or Site Investigation Reports conducted under s. NR 716, Wis. Adm. Code) that identify areas of the Property where a discharge has occurred.

General or other environmental liability clarification - s. 292.55, Wis. Stats. [682] - Explain your request below.

❖ **Include a fee of \$700 and an adequate summary of relevant environmental work to date.**

No Action Required (NAR) - NR 716.05, [682]

❖ **Include a fee of \$700.**

Use where an environmental discharge has or has not occurred, and applicant wants a DNR determination that no further assessment or clean-up work is required. Usually this is requested after a Phase I and Phase II environmental assessment has been conducted; the assessment reports should be submitted with this form. This is not a closure letter.

Clarify the liability associated with a "closed" Property - s. 292.55, Wis. Stats. [682]

❖ **Include a fee of \$700.**

- Include a copy of any closure documents if a state agency other than DNR approved the closure.

Use this space or attach additional sheets to provide necessary information, explanations or specific questions to be answered by the DNR.

Technical Assistance, Environmental Liability
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Section 5. Request for a Specialized Agreement

Select the type of agreement needed. Include the appropriate draft agreements and supporting materials. Complete Sections 6 and 7 of this form. More information and model draft agreements are available at: dnr.wi.gov/topic/Brownfields/Igu.html#tabx4.

- Tax cancellation agreement - s. 75.105(2)(d), Wis. Stats. [654]
- ❖ **Include a fee of \$700, and the information listed below:**
 - (1) Phase I and II Environmental Site Assessment Reports,
 - (2) a copy of the Property deed with the correct legal description; and,
 - (3) a draft 75.105 agreement based on the DNR's model (dnr.wi.gov/topic/brownfields/documents/mod75-105agrmt.pdf).
- Agreement for assignment of tax foreclosure judgement - s.75.106, Wis. Stats. [666]
- ❖ **Include a fee of \$700, and the information listed below:**
 - (1) Phase I and II Environmental Site Assessment Reports,
 - (2) a copy of the Property deed with the correct legal description; and,
 - (3) a draft 75.105 agreement based on the DNR's model (dnr.wi.gov/topic/brownfields/documents/mod75-106agrmt.pdf).
- Negotiated agreement - Enforceable contract for non-emergency remediation - s. 292.11(7)(d) and (e), Wis. Stats. [630]
- ❖ **Include a fee of \$1400, and the information listed below:**
 - (1) a draft schedule for remediation; and,
 - (2) the name, mailing address, phone and email for each party to the agreement.

Section 6. Other Information Submitted

Identify all materials that are included with this request.

Include one copy of any document from any state agency files that you want the Department to review as part of this request. The person submitting this request is responsible for contacting other state agencies to obtain appropriate reports or information.

- Phase I Environmental Site Assessment Report - Date: _____
- Phase II Environmental Site Assessment Report - Date: _____
- Legal Description of Property (required for all liability requests and specialized agreements)
- Map of the Property (required for all liability requests and specialized agreements)
- Analytical results of the following sampled media: Select all that apply and include date of collection.
- Groundwater Soil Sediment Other medium - Describe: _____
- Date of Collection: _____
- A copy of the closure letter and submittal materials
- Draft tax cancellation agreement
- Draft agreement for assignment of tax foreclosure judgment
- Other report(s) or information - Describe: Emailed Lab Reports to Kristin DuFresne. Check is attached to document.

For Property with newly identified discharges of hazardous substances only: Has a notification of a discharge of a hazardous substance been sent to the DNR as required by s. NR 706.05(1)(b), Wis. Adm. Code?

- Yes - Date (if known): _____
- No

Note: The Notification for Hazardous Substance Discharge (non-emergency) form is available at: dnr.wi.gov/files/PDF/forms/4400/4400-225.pdf.

Technical Assistance, Environmental Liability
Clarification or Post-Closure Modification Request

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Section 7. Certification by the Person who completed this form

I am the person submitting this request (requester)

I prepared this request for: _____
Requester Name

I certify that I am familiar with the information submitted on this request, and that the information on and included with this request is true, accurate and complete to the best of my knowledge. I also certify I have the legal authority and the applicant's permission to make this request.

Kenneth G. Ewert

4-5-17

Signature

Date Signed

BRANCH MANAGER

920 892 2444

Title

Telephone Number (include area code)

Technical Assistance, Environmental Liability Clarification or Post-Closure Modification Request

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Section 8. DNR Contacts and Addresses for Request Submittals

Send or deliver one paper copy and one electronic copy on a compact disk of the completed request, supporting materials, and fee to the region where the property is located to the address below. Contact a [DNR regional brownfields specialist](#) with any questions about this form or a specific situation involving a contaminated property. For electronic document submittal requirements see: <http://dnr.wi.gov/files/PDF/pubs/rr/RR690.pdf>.

DNR NORTHERN REGION
 Attn: RR Program Assistant
 Department of Natural Resources
 223 E Steinfest Rd Antigo, WI 54409

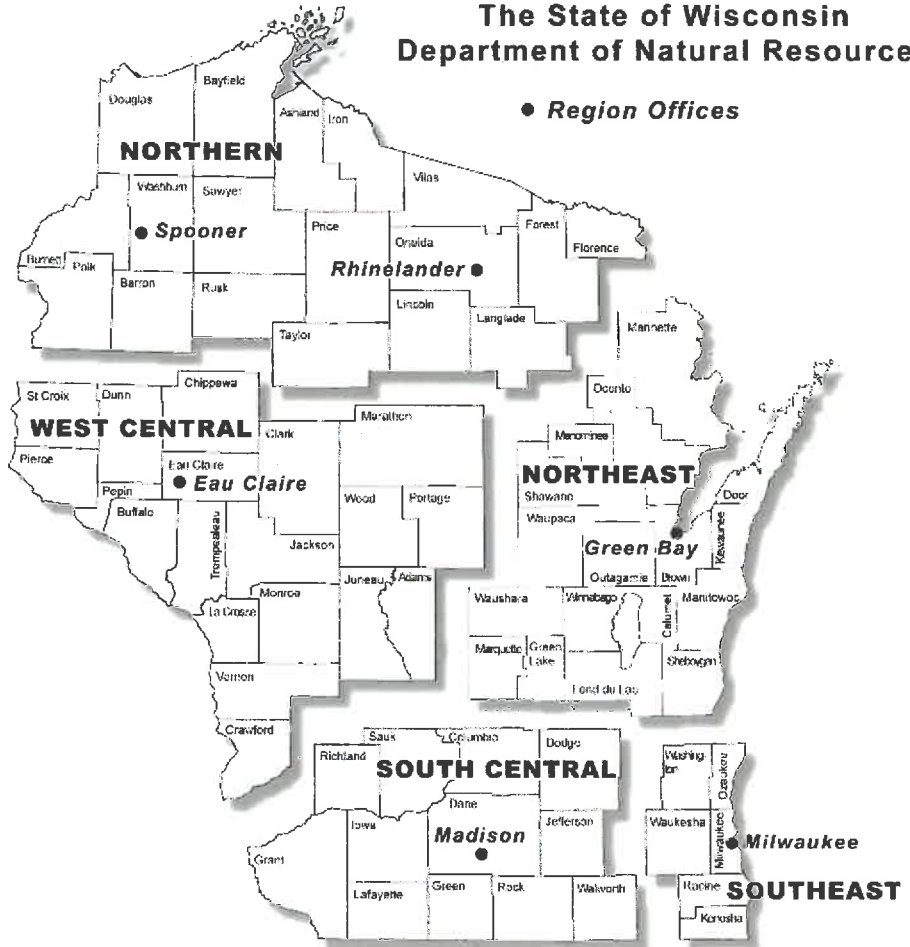
DNR NORTHEAST REGION
 Attn: RR Program Assistant
 Department of Natural Resources
 2984 Shawano Avenue
 Green Bay WI 54313

DNR SOUTH CENTRAL REGION
 Attn: RR Program Assistant
 Department of Natural Resources
 3911 Fish Hatchery Road
 Fitchburg WI 53711

DNR SOUTHEAST REGION
 Attn: RR Program Assistant
 Department of Natural Resources
 2300 North Martin Luther King Drive
 Milwaukee WI 53212

DNR WEST CENTRAL REGION
 Attn: RR Program Assistant
 Department of Natural Resources
 1300 Clairemont Ave.
 Eau Claire WI 54702

The State of Wisconsin Department of Natural Resources



Note. These are the Remediation and Redevelopment Program's designated regions. Other DNR program regional boundaries may be different.

DNR Use Only			
Date Received	Date Assigned	BRTS Activity Code	BRTS No. (if used)
DNR Reviewer		Comments	
Fee Enclosed? <input type="radio"/> Yes <input type="radio"/> No	Fee Amount \$	Date Additional Information Requested	Date Requested for DNR Response Letter
Date Approved	Final Determination		

Table A.2.b
 Soil Analytical Results Table - TCLP
 Bay Towel - Solvent Investigation
 501 Adams St., Green Bay, WI 54301
 BRRTS# 02-05-237064

Sample ID		PRE-EXCAVATION RESULTS FROM BORINGS									TREATED SOIL RESULTS						
		B2	C		F	I	M2	N	Q	I1	I2	K1	K2	Q1	Q2	QB	
Date	Depth	6/28/16	6/28/16		6/28/16	6/28/16	6/28/16	6/28/16	6/28/16	6/28/16	12/6/16	12/6/16	12/6/16	12/6/16	12/6/16	12/8/16	
Description	TCLP Regulatory Level (ug/l)	1-2'	1-2'	7-8'	1-2'	1-2'	1-2'	1-2'	1-2'	1-2'	Grab	Grab	Grab	Grab	Grab	Grab	
DEPTH to Seasonal Low Water Table (ft BGS)		clay	clay	clay	silty sand	silty sand	sand	gravel	silty sand	Mixed Soil	Mixed Soil	Mixed Soil	Mixed Soil	Mixed Soil	Mixed Soil	Mixed Soil	
Saturated (S) or Unsaturated (U)		4-6'	4-6'	4-6'	4-6'	4-6'	4-6'	4-6'	4-6'								
PID Reading		U	U	S	U	U	U	U	U								
Notes		0.0	0.0	0.0	--	0.0	--	0.0	0.0								
TOTAL Tetrachloroethene (PCE)	mg/kg	155	19.4	18.0	41.7	148	18.9	26.3	74.0	248	36.3	184	25.3	436	224	441	
TCLP Tetrachloroethene (PCE)	(ug/L)	700	374	76.3	343	1,280	578	215	171	169	230	25	61	9.3 J	5,500	250	7,700
TOTAL Trichloroethene (TCE)	mg/kg	6.12	0.423	2.64	<0.2	7.69	0.247	0.695	5.61	1.87	1.03	4.14	0.50	2.86	<0.50	<2.5	
TCLP Trichloroethene (TCE)	(ug/L)	500	23.6	<3.3	72.0	60.2	63.1	<3.3	<3.3	25.1	3.8 J	<3.3	4.4 J	<3.3	28.5	<3.3	50 J
TOTAL Vinyl Chloride	mg/kg	<0.625	<0.1	<0.1	<0.2	<0.625	<0.10	<0.20	<0.312	<1.0	<0.1	<0.5	<0.1	<1.25	<0.5	<2.5	
TCLP Vinyl Chloride	(ug/L)	200	<1.8	<1.8	<1.8	<1.8	<1.8	<1.8	<1.8	<1.8	<1.8	2.4 J	<1.8	<8.8	4.2 J	<8.8	
TCLP Benzene	(ug/L)	500	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<25	<5.0	<25	
TCLP Carbon Tetrachloride	(ug/L)	500	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<25	<5.0	<25	
TCLP Chlorobenzene	(ug/L)	100,000	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<25	<5.0	<25	
TCLP Chloroform	(ug/L)	6,000	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	<120	<25.0	<120	
TCLP 1,2-Dichloroethane	(ug/L)	500	<1.7	<1.7	<1.7	<1.7	<1.7	<1.7	<1.7	<1.7	<1.7	<1.7	<1.7	<8.4	<1.7	<8.4	
TCLP 1,1-Dichloroethene	(ug/L)	700	<4.1	<4.1	<4.1	<4.1	<4.1	<4.1	<4.1	<4.1	<4.1	<4.1	<4.1	<21	<4.1	<21	
TCLP 2-Butanone (MEK)	(ug/L)	200,000	<29.8	<29.8	<29.8	<29.8	<29.8	<29.8	<29.8	<30	<30	<30	<30	<150	<30	<150	

Notes:
 BOLD = Exceeds Regulatory Levels
 NS = No standard established
 NA = Not analyzed for parameter
 NR = Not Reported
 RCL = Residual Contaminant Level
 DC = Direct Contact

Table A.2.a
 Soil Analytical Results Table - VOCs
 Bay Towel - Solvent Investigation
 501 Adams St., Green Bay, WI 54301
 BRRTS# 02-05-237064

AREA 1 Soil = 2 Boxes / 60 CY													
Sample ID		Groundwater Pathway RCL (ug/kg)	Industrial Direct-Contact RCL (ug/kg)	TRT SOIL I1	TRT SOIL I1 B	I1 2' South	I1 8' South	I1 14' South	I1 20' South	TRT SOIL I2	TRT SOIL I1 south	TRT SOIL I1 center	TRT SOIL I1 north
Date	Depth			12/6/16	12/8/16	2/7/17	2/7/17	2/7/17	2/7/17	2/7/17	12/6/16	3/31/17	3/31/17
Description				Grab as Mix	Box	0-6'	0-6'	0-6'	0-6'	Grab as Mix	3'	3'	3'
DEPTH to Seasonal Low Water Table (ft BGS)													
Saturated (S) or Unsaturated (U)											0.0	0.0	0.0
PID Reading													
Notes						Boring	Boring	Boring	Boring		Hand Auger	Hand Auger	Hand Auger
Tetrachloroethene (PCE)	(ug/kg)	4.54	153,000	248,000	52,600	136,000	201,000	254,000	239,000	36,300	714	514	279
Trichloroethene (TCE)	(ug/kg)	3.58	8,810	1,870	2,070	1,940	7,040	5,550	3,880	1,030	50.7 J	<33.8	58.5 J
cis-1,2-Dichloroethene	(ug/kg)	41.2	2,040,000	<1,000	1,120	874	3,470	2,130	1,810	503	562	687	560
trans-1,2-Dichloroethene	(ug/kg)	62.8	1,860,000	<1,000	<312	<500	<822	<625	<625	<100	<37.9	<33.8	<34.2
Vinyl Chloride	(ug/kg)	0.138	2,030	<1,000	<312	<500	<822	<625	<625	<100	118 J	59.6 J	<34.2
Sum CVOCs	ug/kg			249,870	55,790	138,814	211,510	261,680	244,690	37,833	1,444	1,260	897
Methylene Chloride	(ug/kg)	2.56	60,700	<1,000	<312					<100			
Benzene	(ug/kg)	5.12		<1,000	<312					<100			
Ethylbenzene	(ug/kg)	1,570	37,000	<1,000	<312					<100			
Toluene	(ug/kg)	1,110	818,000	<1,000	<312					<100			
m&p-Xylene	(ug/kg)	NS	778,000	<2,000	<625					<200			
o-Xylene	(ug/kg)	NS	434,000	<1,000	<312					<100			
Xylenes (TOTAL)	(ug/kg)	3,940	260,000	<3,000	<937					<300			
Naphthalene	(ug/kg)	658	26,000	<1,600	<501					<160			
MTBE	(ug/kg)	27	293,000	<1,000	<312					<100			
1,2,4-Trimethylbenzene	(ug/kg)	NS	219,000	<1,000	<312					<100			
1,3,5-Trimethylbenzene	(ug/kg)	NS	182,000	<1,000	<312					<100			
Trimethylbenzene Total (1,2,4- & 1,3,5-)	(ug/kg)	1,380	NS	<2,000	<624					<200			
Bromobenzene	(ug/kg)	NS	679,000	<1,000	<312					<100			
Bromochloromethane	(ug/kg)	NS	976,000	<1,000	<312					<100			
Bromodichloromethane	(ug/kg)	0.326	1,960	<1,000	<312					<100			
Bromoform	(ug/kg)	2.33	115,000	<1,000	<312					<100			
Bromomethane	(ug/kg)	5.06	46,000	<2,800	<874					<280			
n-Butylbenzene	(ug/kg)	NS	108,000	<1,000	<312					<100			
sec-Butylbenzene	(ug/kg)	NS	145,000	<1,000	<312					<100			
tert-Butylbenzene	(ug/kg)	NS	183,000	<1,000	<312					<100			
Carbon Tetrachloride	(ug/kg)	3.88	4,250	<1,000	<312					<100			
Chlorobenzene	(ug/kg)	NS	761,000	<1,000	<312					<100			
Chloroethane (ethyl chloride)	(ug/kg)	227	2,121,000	<2,680	<838					<268			
Chloroform	(ug/kg)	3.33	2,130	<1,860	<581					<186			
Chloromethane	(ug/kg)	15.5	720,000	<1,000	<312					<100			
2-Chlorotoluene	(ug/kg)	NS	907,000	<1,000	<312					<100			
4-Chlorotoluene	(ug/kg)	NS	253,000	<1,000	<312					<100			
1,2-Dibromo-3-chloropropane	(ug/kg)	0.173	99	<3,650	<1,140					<365			
Dibromochloromethane	(ug/kg)	32	34,100	<1,000	<312					<100			
1,2-Dibromoethane (EDB)	(ug/kg)	0.0282	230	<1,000	<312					<100			
Dibromomethane	(ug/kg)	NS	154,000	<1,000	<312					<100			
1,2-Dichlorobenzene	(ug/kg)	1,168	376,000	<1,000	<312					<100			
1,3-Dichlorobenzene	(ug/kg)	1,153	297,000	<1,000	<312					<100			
1,4-Dichlorobenzene	(ug/kg)	144	17,500	<1,000	<312					<100			
Dichlorodifluoromethane	(ug/kg)	3,086	571,000	<1,000	<312					<100			
1,1-Dichloroethane	(ug/kg)	483	23,700	<1,000	<312					<100			
1,2-Dichloroethane	(ug/kg)	2.84	3,030	<1,000	<312					<100			
1,1-Dichloroethene	(ug/kg)	5.02	1,190	<1,000	<312					<100			
1,2-Dichloropropane	(ug/kg)	3.32	6,620	<1,000	<312					<100			
1,3-Dichloropropane	(ug/kg)	NS	1,490,000	<1,000	<312					<100			
2,2-Dichloropropane	(ug/kg)	NS	191,000	<1,000	<312					<100			
1,1-Dichloropropene	(ug/kg)	NS	NS	<1,000	<312					<100			
cis-1,3-Dichloropropene	(ug/kg)	0.286	1,220,000	<1,000	<312					<100			
trans-1,3-Dichloropropene	(ug/kg)	0.286	1,510,000	<1,000	<312					<100			
Diisopropyl ether	(ug/kg)	NS	2,260,000	<1,000	<312					<100			
Hexachloro-1,3-butadiene	(ug/kg)	NS	7,450	<1,000	<312					<100			
Isopropylbenzene	(ug/kg)	NS	268,000	<1,000	<312					<100			
p-Isopropyltoluene	(ug/kg)	NS	162,000	<1,000	<312					<100			
n-Propylbenzene	(ug/kg)	NS	264,000	<1,000	<312					<100			
Styrene	(ug/kg)	220	867,000	<1,000	<312					<100			
1,1,1,2-Tetrachloroethane	(ug/kg)	53.4	12,900	<1,000	<312					<100			
1,1,1,2,2-Tetrachloroethane	(ug/kg)	0.156	3,690	<1,000	<312					<100			
1,2,3-Trichlorobenzene	(ug/kg)	NS	818,000	<1,000	<312					<100			
1,2,4-Trichlorobenzene	(ug/kg)	408	98,700	<1,900	<594					<190			
1,1,1-Trichloroethane	(ug/kg)	140	640,000	<1,000	<312					<100			
1,1,2-Trichloroethane	(ug/kg)	3.24	7,340	<1,000	<312					<100			
Trichlorofluoromethane	(ug/kg)	NS	1,230,000	<1,000	<312					<100			
1,2,3-Trichloropropane	(ug/kg)	51.9	95	<1,000	<312					<100			

Exceedance Highlights:

BOLD Red font indicates individual or cumulative DC RCL exceedance per DNR RCL calculator 1/16/16, and BTV exceedance for metals.

B1: Cumulative exceedance (HI > 1), even though no individual DC RCL was exceeded.

Italic Red font indicates GW RCL Exceedance per DNR RCL calculator 1/16/16. Groundwater quality (> NR 140 ES) may be affected when GW RCLs are exceeded.

Notes:

- NS = No standard established
- NA = Not analyzed for parameter
- NR = Not Reported
- RCL = Residual Contaminant Level
- DC = Direct Contact

Table A.2.a
 Soil Analytical Results Table - VOCs
 Bay Towel - Solvent Investigation
 501 Adams St., Green Bay, WI 54301
 BRRTS# 02-05-237064

Sample ID	Date	Depth	Description	DEPTH to Seasonal Low Water Table (ft BGS)	Saturated (S) or Unsaturated (U)	PID Reading	Notes	Groundwater Pathway RCL (ug/kg)	Industrial Direct-Contact RCL (ug/kg)	TRT SOIL I2A	TRT SOIL I2A	TRT SOIL I2A	TRT SOIL I2B	TRT SOIL I2B	TRT SOIL I2B	TRT SOIL K1	TRT SOIL K1B	K1 2' South
										south	center	north	south	center	north	12/6/16	12/8/16	2/7/17
		3'								3'	3'	3'	3'	3'	3'	Grab as Mix	Box	0-6'
										0.0	0.0	0.0	0.0	0.0	0.0			
										Hand Auger	Hand Auger	Hand Auger	Hand Auger	Hand Auger	Hand Auger			Boring
Tetrachloroethene (PCE)	(ug/kg)	4.54	153,000	221	138	<32.9	396	84.8 J	138						184,000	22,900	56,800	
Trichloroethene (TCE)	(ug/kg)	3.58	8,810	62.4 J	51.2 J	<32.9	<26.0	<35.7	<29.1						4,140	525	1,100	
cis-1,2-Dichloroethene	(ug/kg)	41.2	2,040,000	279	190	91.4 J	164	244	103						1180 J	537	920	
trans-1,2-Dichloroethene	(ug/kg)	62.8	1,860,000	<35.2	<25.3	<32.9	<26.0	<35.7	<29.1						<500	<100	<312	
Vinyl Chloride	(ug/kg)	0.138	2,030	<35.2	<25.3	<32.9	<26.0	<35.7	<29.1						<500	<100	<312	
Sum CVOCs	ug/kg			562	379	91	560	328	241						189,320	23,962	58,820	
Methylene Chloride	(ug/kg)	2.56	60,700												<500	<100		
Benzene	(ug/kg)	5.12	7,410												<500	<100		
Ethylbenzene	(ug/kg)	1,570	37,000												<500	<100		
Toluene	(ug/kg)	1,110	818,000												<500	<100		
m&p-Xylene	(ug/kg)	NS	778,000												<1,000	<200		
o-Xylene	(ug/kg)	NS	434,000												<500	<100		
Xylenes (TOTAL)	(ug/kg)	3,940	260,000												<1,500	<300		
Naphthalene	(ug/kg)	658	26,000												<801	<160		
MTBE	(ug/kg)	27	293,000												<500	<100		
1,2,4-Trimethylbenzene	(ug/kg)	NS	219,000												<500	<100		
1,3,5-Trimethylbenzene	(ug/kg)	NS	182,000												<500	<100		
Trimethylbenzene Total (1,2,4- & 1,3,5-)	(ug/kg)	1,380	NS												<1,000	<200		
Bromobenzene	(ug/kg)	NS	679,000												<500	<100		
Bromochloromethane	(ug/kg)	NS	976,000												<500	<100		
Bromodichloromethane	(ug/kg)	0.326	1,960												<500	<100		
Bromoform	(ug/kg)	2.33	115,000												<500	<100		
Bromomethane	(ug/kg)	5.06	46,000												<1,400	<280		
n-Butylbenzene	(ug/kg)	NS	108,000												<500	<100		
sec-Butylbenzene	(ug/kg)	NS	145,000												<500	<100		
tert-Butylbenzene	(ug/kg)	NS	183,000												<500	<100		
Carbon Tetrachloride	(ug/kg)	3.88	4,250												<500	<100		
Chlorobenzene	(ug/kg)	NS	761,000												<500	<100		
Chloroethane (ethyl chloride)	(ug/kg)	227	2,121,000												<1,340	<268		
Chloroform	(ug/kg)	3.33	2,130												<929	<186		
Chloromethane	(ug/kg)	15.5	720,000												<500	<100		
2-Chlorotoluene	(ug/kg)	NS	907,000												<929	<100		
4-Chlorotoluene	(ug/kg)	NS	253,000												<500	<100		
1,2-Dibromo-3-chloropropane	(ug/kg)	0.173	99												<1,820	<365		
Dibromochloromethane	(ug/kg)	32	34,100												<500	<100		
1,2-Dibromoethane (EDB)	(ug/kg)	0.0282	230												<500	<100		
Dibromomethane	(ug/kg)	NS	154,000												<500	<100		
1,2-Dichlorobenzene	(ug/kg)	1,168	376,000												<500	<100		
1,3-Dichlorobenzene	(ug/kg)	1,153	297,000												<500	<100		
1,4-Dichlorobenzene	(ug/kg)	144	17,500												<500	<100		
Dichlorodifluoromethane	(ug/kg)	3,086	571,000												<500	<100		
1,1-Dichloroethane	(ug/kg)	483	23,700												<500	<100		
1,2-Dichloroethane	(ug/kg)	2.84	3,030												<500	<100		
1,1-Dichloroethene	(ug/kg)	5.02	1,190												<500	<100		
1,2-Dichloropropane	(ug/kg)	3.32	6,620												<500	<100		
1,3-Dichloropropane	(ug/kg)	NS	1,490,000												<500	<100		
2,2-Dichloropropane	(ug/kg)	NS	191,000												<500	<100		
1,1-Dichloropropene	(ug/kg)	NS	NS												<500	<100		
cis-1,3-Dichloropropene	(ug/kg)	0.286	1,220,000												<500	<100		
trans-1,3-Dichloropropene	(ug/kg)	0.286	1,510,000												<500	<100		
Diisopropyl ether	(ug/kg)	NS	2,260,000												<500	<100		
Hexachloro-1,3-butadiene	(ug/kg)	NS	7,450												<500	<100		
Isopropylbenzene	(ug/kg)	NS	268,000												<500	<100		
p-Isopropyltoluene	(ug/kg)	NS	162,000												<500	<100		
n-Propylbenzene	(ug/kg)	NS	264,000												<500	<100		
Styrene	(ug/kg)	220	867,000												<500	<100		
1,1,1,2-Tetrachloroethane	(ug/kg)	53.4	12,900												<500	<100		
1,1,2,2-Tetrachloroethane	(ug/kg)	0.156	3,690												<500	<100		
1,2,3-Trichlorobenzene	(ug/kg)	NS	818,000												<500	<100		
1,2,4-Trichlorobenzene	(ug/kg)	408	98,700												<951	<190		
1,1,1-Trichlorethane	(ug/kg)	140	640,000												<500	<100		
1,1,2-Trichlorethane	(ug/kg)	3.24	7,340												<500	<100		
Trichlorofluoromethane	(ug/kg)	NS	1,230,000												<500	<100		
1,2,3-Trichloropropane	(ug/kg)	51.9	95												<500	<100		

Exceedance Highlights:

BOLD Red font indicates individual or cumulative DC RCL exceedance per DNR RCL calculator 1/16/16, and BTV exceedance for metals.

B1: Cumulative exceedance (HI > 1), eventhough no individual DC RCL was exceeded.

Italic Red font indicates GW RCL Exceedance per DNR RCL calculator 1/16/16. Groundwater quality (> NR 140 ES) may be affected when GW RCLs are exceeded.

Notes:

- NS = No standard established
- NA = Not analyzed for parameter
- NR = Not Reported
- RCL = Residual Contaminant Level
- DC = Direct Contact

AREA K Soil = 3 Boxes / 90 CY

Sample ID	Date	Depth	Description	DEPTH to Seasonal Low Water Table (ft BGS)	Saturated (S) or Unsaturated (U)	PID Reading	Notes	Groundwater Pathway RCL (ug/kg)	Industrial Direct-Contact RCL (ug/kg)	K1 8' South	K1 14' South	K1 20' South	TRT SOIL K2	TRT SOIL K1 south	TRT SOIL K1 center	TRT SOIL K1 north	TRT SOIL K2A south	TRT SOIL K2A center	TRT SOIL K2A north
										2/7/17	2/7/17	2/7/17	12/6/16	3/31/17	3/31/17	3/31/17	3/31/17	3/31/17	3/31/17
		0-6'								0-6'	0-6'	0-6'	Grab as Mix	3'	3'	3'	3'	3'	3'
														0.0	0.0	0.0	0.0	0.0	0.0
										Boring	Boring	Boring		Hand Auger	Hand Auger	Hand Auger	Hand Auger	Hand Auger	Hand Auger
Tetrachloroethene (PCE)	(ug/kg)	4.54	153,000	50,000	424,000	75,800	25,300	44.5 J	42.6 J	230	312	1,090	583						
Trichloroethene (TCE)	(ug/kg)	3.58	8,810	1,010	9,330	1,910	496	<33.8	<27.2	<32.5	<37.3	<25.0	<32.9						
cis-1,2-Dichloroethene	(ug/kg)	41.2	2,040,000	1,280	3,240	1,550	206 J	109	40.8 J	101	491	293	283						
trans-1,2-Dichloroethene	(ug/kg)	62.8	1,860,000	<312	<2000	<312	<100	<33.8	<27.2	<32.5	<37.3	<25.0	<32.9						
Vinyl Chloride	(ug/kg)	0.138	2,030	<312	<2000	<312	<100	<33.8	<27.2	<32.5	107 J	67.2 J	46.6 J						
Sum CVOCs	ug/kg			52,290	436,570	79,260	26,002	153	83	331	910	1,450	912						
Methylene Chloride	(ug/kg)	2.56	60,700				<100												
Benzene	(ug/kg)	5.12	7,410				<100												
Ethylbenzene	(ug/kg)	1,570	37,000				<100												
Toluene	(ug/kg)	1,110	818,000				<100												
m&p-Xylene	(ug/kg)	NS	778,000				<200												
o-Xylene	(ug/kg)	NS	434,000				<100												
Xylenes (TOTAL)	(ug/kg)	3,940	260,000				<300												
Naphthalene	(ug/kg)	658	26,000				<160												
MTBE	(ug/kg)	27	293,000				<100												
1,2,4-Trimethylbenzene	(ug/kg)	NS	219,000				<100												
1,3,5-Trimethylbenzene	(ug/kg)	NS	182,000				<100												
Trimethylbenzene Total (1,2,4- & 1,3,5-)	(ug/kg)	1,380	NS				<200												
Bromobenzene	(ug/kg)	NS	679,000				<100												
Bromochloromethane	(ug/kg)	NS	976,000				<100												
Bromodichloromethane	(ug/kg)	0.326	1,960				<100												
Bromoform	(ug/kg)	2.33	115,000				<100												
Bromomethane	(ug/kg)	5.06	46,000				<280												
n-Butylbenzene	(ug/kg)	NS	108,000				<100												
sec-Butylbenzene	(ug/kg)	NS	145,000				<100												
tert-Butylbenzene	(ug/kg)	NS	183,000				<100												
Carbon Tetrachloride	(ug/kg)	3.88	4,250				<100												
Chlorobenzene	(ug/kg)	NS	761,000				<100												
Chloroethane (ethyl chloride)	(ug/kg)	227	2,121,000				<268												
Chloroform	(ug/kg)	3.33	2,130				<186												
Chloromethane	(ug/kg)	15.5	720,000				<100												
2-Chlorotoluene	(ug/kg)	NS	907,000				<100												
4-Chlorotoluene	(ug/kg)	NS	253,000				<100												
1,2-Dibromo-3-chloropropane	(ug/kg)	0.173	99				<365												
Dibromochloromethane	(ug/kg)	32	34,100				<100												
1,2-Dibromoethane (EDB)	(ug/kg)	0.0282	230				<100												
Dibromomethane	(ug/kg)	NS	154,000				<100												
1,2-Dichlorobenzene	(ug/kg)	1,168	376,000				<100												
1,3-Dichlorobenzene	(ug/kg)	1,153	297,000				<100												
1,4-Dichlorobenzene	(ug/kg)	144	17,500				<100												
Dichlorodifluoromethane	(ug/kg)	3,086	571,000				<100												
1,1-Dichloroethane	(ug/kg)	483	23,700				<100												
1,2-Dichloroethane	(ug/kg)	2.84	3,030				<100												
1,1-Dichloroethene	(ug/kg)	5.02	1,190				<100												
1,2-Dichloropropane	(ug/kg)	3.32	6,620				<100												
1,3-Dichloropropane	(ug/kg)	NS	1,490,000				<100												
2,2-Dichloropropane	(ug/kg)	NS	191,000				<100												
1,1-Dichloropropene	(ug/kg)	NS	NS				<100												
cis-1,3-Dichloropropene	(ug/kg)	0.286	1,220,000				<100												
trans-1,3-Dichloropropene	(ug/kg)	0.286	1,510,000				<100												
Diisopropyl ether	(ug/kg)	NS	2,260,000				<100												
Hexachloro-1,3-butadiene	(ug/kg)	NS	7,450				<100												
Isopropylbenzene	(ug/kg)	NS	268,000				<100												
p-Isopropyltoluene	(ug/kg)	NS	162,000				<100												
n-Propylbenzene	(ug/kg)	NS	264,000				<100												
Styrene	(ug/kg)	220	867,000				<100												
1,1,1,2-Tetrachloroethane	(ug/kg)	53.4	12,900				<100												
1,1,2,2-Tetrachloroethane	(ug/kg)	0.156	3,690				<100												
1,2,3-Trichlorobenzene	(ug/kg)	NS	818,000				<100												
1,2,4-Trichlorobenzene	(ug/kg)	408	98,700				<190												
1,1,1-Trichloroethane	(ug/kg)	140	640,000				<100												
1,1,2-Trichloroethane	(ug/kg)	3.24	7,340				<100												
Trichlorofluoromethane	(ug/kg)	NS	1,230,000				<100												
1,2,3-Trichloropropane	(ug/kg)	51.9	95				<100												

Exceedance Highlights:

BOLD Red font indicates individual or cumulative DC RCL exceedance per DNR RCL calculator 1/16/16, and BTV exceedance for metals.

B1: Cumulative exceedance (HI > 1), even though no individual DC RCL was exceeded.

Italic Red font indicates GW RCL Exceedance per DNR RCL calculator 1/16/16. Groundwater quality (> NR 140 ES) may be affected when GW RCLs are exceeded.

Notes:

- NS = No standard established
- NA = Not analyzed for parameter
- NR = Not Reported
- RCL = Residual Contaminant Level
- DC = Direct Contact

Table A.2.a
 Soil Analytical Results Table - VOCs
 Bay Towel - Solvent Investigation
 501 Adams St., Green Bay, WI 54301
 BRRTS# 02-05-237064

Sample ID	Date	Depth	Description	Groundwater Pathway RCL (ug/kg)	Industrial Direct-Contact RCL (ug/kg)	AREA Q Soil = 1 Box / 30 CY								
						TRT SOIL K2B south	TRT SOIL K2B center	TRT SOIL K2B north	TRT SOIL Q1	TRT SOIL Q2	TRT SOIL QB	TRT SOIL Q1/Q2 south	TRT SOIL Q1/Q2 center	TRT SOIL Q1/Q2 north
						3/31/17	3/31/17	3/31/17	12/6/16	12/6/16	12/8/16	3/31/17	3/31/17	3/31/17
						3'	3'	3'	Grab as Mix	Grab as Mix	Box	3'	3'	3'
						0.0	0.0	0.0				0.0	0.0	0.0
						Hand Auger	Hand Auger	Hand Auger				Hand Auger	Hand Auger	Hand Auger
Tetrachloroethene (PCE)	(ug/kg)	4.54	153,000	701	1,760	884			436,000	224,000	441,000	674	134	235
Trichloroethene (TCE)	(ug/kg)	3.58	8,810	46.5 J	145	<27.8			2860 J	<500	<2,500	<34.2	<26.9	<32.9
cis-1,2-Dichloroethene	(ug/kg)	41.2	2,040,000	382	399	189			<1,250	1480 J	<2,500	504	318	279
trans-1,2-Dichloroethene	(ug/kg)	62.8	1,860,000	<29.8	<32.1	<27.8			<1,250	<500	<2,500	<34.2	<26.9	<32.9
Vinyl Chloride	(ug/kg)	0.138	2,030	62.0 J	<32.1	47.6 J			<1,250	<500	<2,500	111	36.4 J	55.5 J
Sum CVOCs	ug/kg			1,191	2,304	1,087			438,860	225,480	441,000	1,289	488	569
Methylene Chloride	(ug/kg)	2.56	60,700						<1,250	<500	<2,500			
Benzene	(ug/kg)	5.12	7,410						<1,250	<500	<2,500			
Ethylbenzene	(ug/kg)	1,570	37,000						<1,250	<500	<2,500			
Toluene	(ug/kg)	1,110	818,000						<1,250	<500	<2,500			
m&p-Xylene	(ug/kg)	NS	778,000						<2,500	<1,000	<5,000			
o-Xylene	(ug/kg)	NS	434,000						<1,250	<500	<2,500			
Xylenes (TOTAL)	(ug/kg)	3,940	260,000						<3,750	<1,500	<7,500			
Naphthalene	(ug/kg)	658	26,000						<2,000	<801	<4,000			
MTBE	(ug/kg)	27	293,000						<1,250	<500	<2,500			
1,2,4-Trimethylbenzene	(ug/kg)	NS	219,000						<1,250	<500	<2,500			
1,3,5-Trimethylbenzene	(ug/kg)	NS	182,000						<1,250	<500	<2,500			
Trimethylbenzene Total (1,2,4- & 1,3,5-)	(ug/kg)	1,380	NS						<2,500	<1,000	<5,000			
Bromobenzene	(ug/kg)	NS	679,000						<1,250	<500	<2,500			
Bromochloromethane	(ug/kg)	NS	976,000						<1,250	<500	<2,500			
Bromodichloromethane	(ug/kg)	0.326	1,960						<1,250	<500	<2,500			
Bromoform	(ug/kg)	2.33	115,000						<1,250	<500	<2,500			
Bromomethane	(ug/kg)	5.06	46,000						<3,500	<1,400	<6,990			
n-Butylbenzene	(ug/kg)	NS	108,000						<1,250	<500	<2,500			
sec-Butylbenzene	(ug/kg)	NS	145,000						<1,250	<500	<2,500			
tert-Butylbenzene	(ug/kg)	NS	183,000						<1,250	<500	<2,500			
Carbon Tetrachloride	(ug/kg)	3.88	4,250						<1,250	<500	<2,500			
Chlorobenzene	(ug/kg)	NS	761,000						<1,250	<500	<2,500			
Chloroethane (ethyl chloride)	(ug/kg)	227	2,121,000						<3,350	<1,340	<6,700			
Chloroform	(ug/kg)	3.33	2,130						<2,320	<929	<4,640			
Chloromethane	(ug/kg)	15.5	720,000						<1,250	<500	<2,500			
2-Chlorotoluene	(ug/kg)	NS	907,000						<1,250	<929	<2,500			
4-Chlorotoluene	(ug/kg)	NS	253,000						<1,250	<500	<2,500			
1,2-Dibromo-3-chloropropane	(ug/kg)	0.173	99						<4,560	<1,820	<9,120			
Dibromochloromethane	(ug/kg)	32	34,100						<1,250	<500	<2,500			
1,2-Dibromoethane (EDB)	(ug/kg)	0.0282	230						<1,250	<500	<2,500			
Dibromomethane	(ug/kg)	NS	154,000						<1,250	<500	<2,500			
1,2-Dichlorobenzene	(ug/kg)	1,168	376,000						<1,250	<500	<2,500			
1,3-Dichlorobenzene	(ug/kg)	1,153	297,000						<1,250	<500	<2,500			
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Dichlorodifluoromethane	(ug/kg)	3,086	571,000						<1,250	<500	<2,500			
1,1-Dichloroethane	(ug/kg)	483	23,700						<1,250	<500	<2,500			
1,2-Dichloroethane	(ug/kg)	2.84	3,030						<1,250	<500	<2,500			
1,1-Dichloroethene	(ug/kg)	5.02	1,190						<1,250	<500	<2,500			
1,2-Dichloropropane	(ug/kg)	3.32	6,620						<1,250	<500	<2,500			
1,3-Dichloropropane	(ug/kg)	NS	1,490,000						<1,250	<500	<2,500			
2,2-Dichloropropane	(ug/kg)	NS	191,000						<1,250	<500	<2,500			
1,1-Dichloropropene	(ug/kg)	NS	NS						<1,250	<500	<2,500			
cis-1,3-Dichloropropene	(ug/kg)	0.286	1,220,000						<1,250	<500	<2,500			
trans-1,3-Dichloropropene	(ug/kg)	0.286	1,510,000						<1,250	<500	<2,500			
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1,1,2,2-Tetrachloroethane	(ug/kg)	0.156	3,690						<1,250	<500	<2,500			
1,2,3-Trichlorobenzene	(ug/kg)	NS	818,000						<1,250	<500	<2,500			
1,2,4-Trichlorobenzene	(ug/kg)	408	98,700						<2,380	<951	<4,760			
1,1,1-Trichloroethane	(ug/kg)	140	640,000						<1,250	<500	<2,500			
1,1,2-Trichloroethane	(ug/kg)	3.24	7,340						<1,250	<500	<2,500			
Trichlorofluoromethane	(ug/kg)	NS	1,230,000						<1,250	<500	<2,500			
1,2,3-Trichloropropane	(ug/kg)	51.9	95						<1,250	<500	<2,500			

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