



500 Ridge Road, Ward, CO 80481 | (303) 459-0164

March 27, 2017

Mr. Michael Schmoller
Wisconsin Department of Natural Resources-South Central Region
3911 Fish Hatchery Road
Fitchburg, Wisconsin 53711

Subject: Trent Tube Plant 1 Group A Closure Application Form 4400-202 and Attachments

Trent Tube Plant No. 1 2188 Church St., East Troy, Wisconsin
FID # 265097030; BRRTS NO. 02-65-245827; U.S. EPA ID WID 006097281

Dear Mr. Schmoller:

On behalf of EnPro Holdings, Inc. (EH), RJRudy LLC (RJR) is submitting the attached Trent Tube Plant 1 Group A Closure Application and Attachments in unbound hard copy as well as in compact disk format. In addition, we have included a check for: Closure Fees (\$1050), Data Base Fee for Groundwater or Monitoring Wells (\$350), and Data Base Fee for Soil (\$300) for a total of \$1700.

Please call me at 303-459-0164 or email at rickrudy@rjrudyllc.com if you have any comments or questions regarding this submittal.

Sincerely,
RJR

Richard J. Rudy, PG
Project Director

cc: Benne Hutson, EnPro Holdings, Inc.
Charles Merrill, Husch Blackwell LLP

Attachments:

- Trent Tube Plant 1 Closure Application Form 4400-202 with Attachments
- Compact Disk E-Copy of Trent Tube Plant 1 Closure Application Form 4400-202 with Attachments
- Applicable Fees (RJR Check)

SUBMIT AS UNBOUND PACKAGE IN THE ORDER SHOWN

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

| Site Information | | | |
|----------------------------|---|-----------|--|
| BRRTS No. | VPLE No. | | |
| 02-65-245827 | | | |
| Parcel ID No. | | | |
| RXUP 00166 | | | |
| FID No. | WTM Coordinates | | |
| | X | 650,581 | Y 257,789 |
| BRRTS Activity (Site) Name | WTM Coordinates Represent: | | |
| Trent Tube (Plant 1) | <input checked="" type="checkbox"/> Source Area | | <input type="checkbox"/> Parcel Center |
| Site Address | City | State | ZIP Code |
| | 2188 Church Street Acres Ready For Use | East Troy | WI 53120 |
| 12 | | | |

| | | | |
|-----------------------------|----------------------------------|-----------|----------|
| Responsible Party (RP) Name | | | |
| Benne C. Hutson | | | |
| Company Name | | | |
| EnPro Holdings, Inc. | | | |
| Mailing Address | City | State | ZIP Code |
| | 5605 Carnegie Blvd Suite # 500 | Charlotte | NC 28209 |
| Phone Number | Email | | |
| (704) 731-1500 | Benne.Hutson@enproindustries.com | | |

Check here if the RP is the owner of the source property.

| | | | |
|-------------------------------|------------------------|-------|----------|
| Environmental Consultant Name | | | |
| Richard Rudy | | | |
| Consulting Firm | | | |
| RJRUDY LLC | | | |
| Mailing Address | City | State | ZIP Code |
| | 500 Ridge Road | Ward | CO 80481 |
| Phone Number | Email | | |
| (303) 570-5604 | rickrudy@rjrudyllc.com | | |

Fees and Mailing of Closure Request

1. Send a copy of page one of this form and the applicable ch. NR 749, Wis. Adm. Code, fee(s) to the DNR Regional EPA (Environmental Program Associate) at <http://dnr.wi.gov/topic/Brownfields/Contact.html>. Check all fees that apply:

- \$1,050 Closure Fee
- \$300 Database Fee for Soil
- \$350 Database Fee for Groundwater or Monitoring Wells (Not Abandoned)
- Total Amount of Payment \$ 1,700.00
- Resubmittal, Fees Previously Paid

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

Site Summary

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

1. General Site Information and Site History

- A. **Site Location:** Describe the physical location of the site, both generally and specific to its immediate surroundings.
The Site is located at 2188 Church Street, East Troy, Walworth County, Wisconsin. The Site occupies 11.97 acres within the W2NW quarter-quarter of Section 29, T4N, R18E, at an elevation of approximately 830 feet above mean sea level (AMSL). This closure request is for a specific area of the property referred to as Group A. Group A is 2.8 acres in area and includes the GP18 Area, the MW16/Flume Area and the MW17 Area, located in the northwest central portion of the property (see Figures B.1.a and B.1.b). Note that the GP09 Area will be moved to Group C given that this location is similar to the South Pickling Area on the western boundary of the property.
- B. **Prior and current site usage:** Specifically describe the current and historic occupancy and types of use.
The site is a former stainless steel tubing manufacturing facility. Manufacturing activity consisted of weld, cold-working and annealed production of stainless steel tubing along with surface-cleaning and sizing of the tubing prior to shipment. All historic manufacturing facilities have been demolished and removed. The site is vacant fenced land mostly covered with the phytoremediation Poplar trees and is undergoing groundwater remediation.
- C. **Current zoning (e.g., industrial, commercial, residential) for the site and for neighboring properties, and how verified (Provide documentation in Attachment G).**
The site is zoned SR-4 Suburban Residential. This was verified using the Village of East Troy zoning map available at https://villageofeasttroy.zoninghub.com/highlights/map_v5.aspx. Group A areas are all within the 11.97 parcel boundary with no adjacent parcels affected.

Neighboring properties around Trent Tube Plant 1 are zoned SR-4 Suburban Residential (north and east of site: CMERT owned and southwest of the site: Village of East Troy owned), RH-35 Rural Holding (east of site south of Honey Creek: Village of East Troy owned), TR-8 Two Family Residential (northwest of site), MR-10 Multi-Family Residential (on west side of County Hwy G - Route 120) and GI General Industrial (south of Honey Creek: Village of East Troy owned).

- D. **Describe how and when site contamination was discovered.**
In 1988, the US EPA inspected the site and determined that chlorinated solvents and metals were present in onsite soils and groundwater. In 1990 and 1991 Trent Tube conducted assessment activities which confirmed that trichloroethene (TCE) and 1,1,1-trichloroethane (TCA) were present in groundwater at the Site. Other compounds detected included benzene, other volatile organic compounds (VOCs), nickel, and chromium (see 3.A.i. for site investigation references).
- E. **Describe the type(s) and source(s) or suspected source(s) of contamination.**
Chlorinated solvents were used in vapor degreasing operations at the site. Chlorinated solvents including trichloroethene (TCE) and possibly 1,1,1-trichloroethane (1,1,1-TCA) were stored in an aboveground storage tank (AST) located in the Group A MW-17 area. Additional ASTs were located at the southeast corner of the former plant building.

Metals present in the Group A area are likely associated with the acid pickling and rinsing process, which was conducted in tanks located at the northwest corner of the building (North Pickle Area). Waste acid storage occurred outside the northern part of the plant building. Sludge and scale were generated in the descaling salt bath and acid tanks.

Petroleum underground storage tanks (USTs) containing gasoline and fuel oil were used at the property and may be the source of petroleum constituents. Waste oil from machining and maintenance operations was stored in an on-site AST.
- F. **Other relevant site description information (or enter Not Applicable).**
Not applicable.
- G. **List BRRTS activity/site name and number for BRRTS activities at this source property, including closed cases.**
Trent Tube (Plant 1) 02-65-245827

- H. **List BRRTS activity/site name(s) and number(s) for all properties immediately adjacent to (abutting) this source property.**
Not applicable.

2. General Site Conditions

- A. **Soil/Geology**
- i. **Describe soil type(s) and relevant physical properties, thickness of soil column across the site, vertical and lateral variations in soil types.**
Three predominant geologic units are present: an upper fill unit of sand and gravel, sand, and silt (5 to 22 feet below land surface [bls]); a middle unit of native clay, sand and silt, sand and gravel, and silt (4 to 16 feet thick); and a lower glacial drift or till. According to WDNR file information, the till unit appears to be contiguous across the site and

appears to represent a confining layer. Refer to Figure B.3.a for a geologic cross section of the site.

- ii. Describe the composition, location and lateral extent, and depth of fill or waste deposits on the site. Sand, gravel and silt occur from ground surface to a depth of between 5 and 22 feet bls. Within Group A, fill is generally present to a depth of approximately 5 feet bls underneath the former manufacturing buildings.
- iii. Describe the depth to bedrock, bedrock type, competency and whether or not it was encountered during the investigation. The depth to bedrock at the site is approximately 250 feet. Bedrock underlying the site is the Ordovician Maquoketa Shale and the Galena, Decorah and Platteville Formations. The Maquoketa Formation extends west and south of the site and the Galena, Decorah and Platteville Formations extend north and east of the site. Bedrock was not encountered during investigative activities.
- iv. Describe the nature and locations of current surface cover(s) across the site (e.g., natural vegetation, landscaped areas, gravel, hard surfaces, and buildings).
The Group A area is primarily situated where the former manufacturing building was located. The Group A area currently has concrete surfaces in the northern portion, gravel in the western and eastern portions, and landscaped phytoremediation in the central and southern portions. Grassy areas also occur across the Group A area.

B. Groundwater

- i. Discuss depth to groundwater and piezometric elevations. Describe and explain depth variations, including high and low water table elevation and whether free product affects measurement of water table elevation. Describe the stratigraphic unit(s) where water table was found or which were measured for piezometric levels.
Depth to groundwater within the Group A area is as follows: MW16 between 8-12 ft below casing, MW17R between 6.5-8 ft below casing and MW21 between 4-8 ft below casing. The only notable depth variation is in MW21 which exhibited a seasonal high water of 1.2 ft below casing in March 2008. There is no free product present in the Group A area. Figure B.3.a shows a geologic cross section with the water level indicated. The water table is unconfined and resides in the shallow stratigraphic units above the till.
- ii. Discuss groundwater flow direction(s), shallow and deep. Describe and explain flow variations, including fracture flow if present.
Ground water flow in the Group A area is generally south towards Honey Creek, but ranges from southeast to southwest - see Figure B.3.c.
- iii. Discuss groundwater flow characteristics: hydraulic conductivity, flow rate and permeability, or state why this information was not obtained.
Annual groundwater reports have included potentiometric data and maps since 2001. The general groundwater flow in the Group A area is to the south-southeast. The July 1999 Final Remedial Closure Plan reports hydraulic conductivity in the Group A area of 9.31E-05 ft/sec. Based on the hydraulic gradient as shown in Figure B.3.c and reported values for porosity, a flow rate of 22 ft/yr is calculated. Additional information on groundwater flow characteristics can be found in the referenced 1999 report.
- iv. Identify and describe locations/distance of potable and/or municipal wells within 1200 feet of the site. Include general summary of well construction (geology, depth of casing, depth of screened or open interval).
There are two water wells within 1200 feet of the site. Well 1 is located at 2155 Hillcrest Drive (NW 1/4 NW 1/4 S 29 T 4 N R 18 E) approximately 350 feet NE of the Group A areas. Casing for this well is set in limestone at a depth of 92 feet. The well is designated as an irrigation well. Well 2 is located north of Buell Drive and south of Honey Creek (SW 1/4 SW 1/4 NW 1/4 S 29 T 4 N R 18 E) approximately 600 feet from the Group A areas. Casing for this well is set at a depth of 142 feet in coarse gravel. The identified well locations are shown in Figure B.1.a.

3. Site Investigation Summary

A. General

- i. Provide a brief summary of the site investigation history. Reference previous submittals by name and date. Describe site investigation activities undertaken since the last submittal for this project and attach the appropriate documentation in Attachment C, if not previously provided.
1984: WDNR conducted a site assessment and determined that heavy metal sludge had been discharged into on-site lagoons for 20-30 years (Wisconsin Department of Natural Resources, 2015, Consent Order No. 2013-SEEE-044, Findings of Fact).
1988: EPA inspected the site and determined that chlorinated solvents and metals were present in soils and groundwater (Consent Order No. 2013-SEEE-044).
1990 to late 1991: Trent Tube conducted assessment activities which confirmed that trichloroethylene (TCE) and trichloroethane (TCA) were present in groundwater at the Site. Other compounds detected included benzene, other volatile organic compounds (VOCs), nickel, and chromium (Consent Order No. 2013-SEEE-044).
May, 1995: Trent Tube submitted a Site Closure/Investigation Plan to WDNR for the South Pickle Area, Hazardous Waste Container Areas, Settling Impoundment and Channel, and Former Impoundment at the current AOC location (Triad, 1995, Site Closure/Investigation Plan for Trent Tube Plant No. 1).

March, 1996: Trent Tube submitted a Site Investigation Report to WDNR (Triad, Site Investigation Report, Trent Tube Plant No. 1, March 15, 1996).

September 2003: Trent Tube submitted a Honey Creek Sediment Investigation Report which described impacts to sediments in Honey Creek (Triad 2003, Honey Creek Sediment Investigation Report, Trent Tube Plant No. 1).

July 2007: Trent Tube submitted a Utility Corridor Investigation Report. The investigation evaluated utility corridors as potential pathways for migration of DNAPLs (Symbiont 2007, Utility Corridor Investigation, Trent Tube No. 1).

November 2012: Trent Tube submitted a Limited Site Investigation Report documenting sample results around an unlined flume vault sump (Symbiont 2012, Limited Site Investigation Former Trent Tube Plant No. 1).

December 2015: Trent Tube submitted a Site Investigation Report (RJ Rudy LLC 2015, Site Investigation Report, Former Trent Tube Plant 1 Site).

August 2016: Trent Tube submitted a Group A Confirmation Closure Sampling Report (RJ Rudy LLC, 2016, Trent Tube: Group A Confirmation Closure Sampling Report).

February 2017: Trent Tube submitted a Group A Supplemental Soil and Groundwater Results (RJ Rudy LLC, 2016 Group A Supplemental Soil and Groundwater Results Report).

- ii. Identify whether contamination extends beyond the source property boundary, and if so describe the media affected (e.g., soil, groundwater, vapors and/or sediment, etc.), and the vertical and horizontal extent of impacts.
The Group A area is defined as shown in Figures B.1.a and B.1.b. Soil contamination extending beyond the Group A boundary and, potentially, the property boundary will be addressed in subsequent closure applications. Downgradient recovery wells are capturing groundwater from the Group A Area and are effective in preventing offsite contaminant migration.
- iii. Identify any structural impediments to the completion of site investigation and/or remediation and whether these impediments are on the source property or off the source property. Identify the type and location of any structural impediment (e.g., structure) that also serves as the performance standard barrier for protection of the direct contact or the groundwater pathway.
Not applicable.

B. Soil

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

Soil VOC concentrations within the Group A area are less than the non-industrial direct contact residual contaminant levels (RCLs). One historical soil sample taken from the MW17 boring over 20 years ago (in 1996) had a TCE concentration of 2,310 µg/kg, above the direct contact RCL of 1,260 µg/kg. A sample taken from this location (GA-SA7) in November 2016 did not exceed the TCE direct contact RCL (39.3J µg/kg : J = estimated quantity).

Historical soil VOC concentrations within the Group A area have exceeded the groundwater protection RCLs for TCE (3.6 µg/kg), PCE (4.6 µg/kg) and 1,1,1-TCA (140.2 µg/kg) as follows:

- TCE in the MW16/Flume Area at GP12, GP13, GP17 and MW16 in 1996, HP27 and HP75 in 1998 with the highest concentration at 1,100 µg/kg, and in the MW17 Area at GP14 and MW17 in 1996, with the highest concentration at 2,310 µg/kg.
- PCE in the MW17 and MW16/Flume areas at GP13 and GP14 in 1996 with the highest concentration at 51 µg/kg
- 1,1,1-TCA in the MW16/Flume area at HP26 in 1998 with a concentration of 2,080 µg/kg.

One soil sample collected at GA-SA7 (during the November, 2016 Group A Closure Supplemental Sampling) exceeds the groundwater protection RCL for TCE at 39.3J µg/kg.

Arsenic is present in soil at concentrations exceeding the non-industrial direct contact RCL (613 µg/kg) and groundwater protection RCL (584 µg/kg) in all three areas of Group A. Samples taken in November 2016 show arsenic concentrations ranging from 1,100 µg/kg to 3,400 µg/kg, less than the statewide soil arsenic background threshold value (BTV) of 8,000 µg/kg (WDNR Publication RR940). This closure application does not represent arsenic as a residual soil contaminant since arsenic concentrations are below the statewide BTV.

Hexavalent chromium concentrations exceeded the non-industrial direct contact RCL (293 µg/kg) at HP66 (14,000 µg/kg) and MW21 (5,710 µg/kg) in samples collected in 1998/1999. Soil samples taken in November 2016 at these locations (GA-SA1 and GA-SA5) in support of this closure application showed no hexavalent chromium contamination above detection limits. Laboratory detection limits were greater than the direct contact RCL due to dilution of the samples using EPA Method 7196A. This apparent decrease in the concentration of hexavalent chromium in site soils can be attributed to the reduction of Cr (VI) to Cr (III) resulting from aqueous Fe (II), ferrous iron minerals, reduced sulfur and organic matter in the soil and groundwater.

Concentrations of nickel in soil exceeded the groundwater protection RCL (13,060 µg/kg) in samples collected in November 2016 in the MW17 Area (87,100 µg/kg) and in the GP18 Area (155,000 µg/kg). Concentrations of selenium in soil exceeded the groundwater protection RCL (520 µg/kg) in samples collected in November 2016 in the MW17 Area (1,400J µg/kg), in the GP18 Area (1,600J µg/kg) and in the MW16/Flume Area (1,200J µg/kg).

Soil contamination at the site is presented in Figures B.2.a and B.2.b.

- ii. Describe the concentration(s) and types of soil contaminants found in the upper four feet of the soil column. All samples collected in November 2016 in support of this closure application were obtained from the upper four feet of the soil column. With the exception of arsenic, none of these confirmation samples had exceeded the non-industrial direct contact RCLs.

Six (6) historical samples have been taken from the upper four feet of the soil column in the MW16/Flume area and MW17 area. Of these VOC samples, the only one which exceeded the non-industrial direct contact RCL of 1,260 µg/kg was MW17 (3-5 ft) taken in 1996 with a TCE concentration of 2,310 µg/kg. The November 2016 sample GA-SA7 taken at this location had a TCE concentration of 39.3J µg/kg, not exceeding the direct contact RCL.

Hexavalent chromium was detected in the historical sample taken from HP66 (14,000 µg/kg). The November 2016 sample GA-SA5 was non-detect for hexavalent chromium. The direct contact RCL for arsenic of 613 µg/kg was exceeded in all samples collected within Group A in November 2016, but at concentrations less than the arsenic BTV.

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

The NR 720 Wis. Adm. Code method used to establish the soil cleanup standards for this site is the WDNR Remediation & Redevelopment Program spreadsheet containing direct contact RCLs for non-industrial and industrial land use and soil to groundwater pathway RCLs available at: <http://dnr.wi.gov/topic/Brownfields/Professionals.html>. The spreadsheet presents RCLs calculated using the US EPA Regional Screening Table web calculator, with input parameters based on the requirements of NR 720 and other risk assumptions consistent with WDNR regulations.

C. Groundwater

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

The degree and areal extent of groundwater contamination within the Group A area is shown in Figure B.3.b.

Groundwater contamination exceeded the enforcement standard (ES) for VOCs in the MW16/Flume Area and the MW17 Area during groundwater sampling conducted in 2016 as follows:

- In MW16, the ES for TCE (5 µg/L) was exceeded with a concentration of 72.2 µg/L.
- In RW8, the ES for cis-1,2-dichloroethene (70 µg/L) was exceeded with a concentration of 361 µg/L, the ES for 1,1-dichloroethene (7 µg/L) was exceeded with a concentration of 13.7 µg/L, the ES for TCE (5µg/L) was exceeded with a concentration of 498 µg/L and the ES for vinyl chloride (0.2 µg/L) was exceeded with a concentration of 6.2 µg/L.
- In MW17R, the ES for cis-1,2-dichloroethene (70 µg/L) was exceeded with a concentration of 158 µg/L, the ES for TCE (5µg/L) was exceeded with a concentration of 964 µg/L and the ES for vinyl chloride (0.2 µg/L) was exceeded with a concentration of 21.8 µg/L.
- In MW37R, the ES for TCE (5 µg/L) was exceeded with a concentration of 14 µg/L.

Groundwater contamination exceeded the preventive action limit (PAL) for VOCs in the MW16/Flume Area and the MW17 Area during groundwater sampling conducted in 2016 as follows:

- In MW16, the PAL for 1,1-dichloroethene (0.7 µg/L) was exceeded with a concentration of 1.7 µg/L, the PAL for cis-1,2-dichloroethene (7 µg/L) was exceeded with a concentration of 22.4 µg/L, the PAL for 1,1,1-trichloroethane (40 µg/L) was exceeded with a concentration of 92.9 µg/L, the PAL for tetrachloroethene (0.5 µg/L) was exceeded with a concentration of 0.67J µg/L and the PAL for vinyl chloride (0.02 µg/L) was exceeded with a concentration of 0.18J µg/L.
- In RW8, the PAL for 1,1,1-trichloroethane (40 µg/L) was exceeded with a concentration of 178 µg/L.
- In MW17R, the PAL for trans-1,2-dichloroethene (20 µg/L) was exceeded with a concentration of 41.9 µg/L and the PAL for tetrachloroethene (0.5 µg/L) was exceeded with a concentration of 4.1J µg/L.

There were no VOCs detected in groundwater exceeding the ES or PAL in the GP18 Area.

Arsenic exceeded the ES (10 µg/L) in MW17R with a concentration of 20.5 µg/L. Chromium exceeded the PAL (10 µg/L) with a concentration of 10.7 µg/L in MW21. Nickel exceeded the PAL (20 µg/L) with a concentration of 24.4

µg/L in MW17R and a concentration of 40.6 in MW21. Selenium exceeded the PAL (10 µg/L) with a concentration of 10.2J µg/L in MW21.

The water supply well to the north of the site is upgradient and completed below the silt confining layer. The well to the south of the site is protected by hydraulic barriers of the groundwater extraction and treatment system (GETS) and Honey Creek.

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

RW8 was installed in 1999 within the Group A area for manual recovery of free product. Groundwater from RW8 has been regularly sampled since July 2013 and the presence of free product has not been reported from that time to the present. TCE concentrations in samples from RW8 have been between 500 µg/L and 1,400 µg/L.

D. Vapor

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

For the Group A areas, the vapor migration pathway was not assessed. Groundwater contamination is shown in Figure B.3.b and has not been shown to be migrating to the north of the property where residences are located.

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

Not applicable.

E. Surface Water and Sediment

- i. Identify whether surface water and/or sediment was assessed and describe the impacts found. If this pathway was not assessed, explain why.

There is no surface water or sediment within the Group A areas.

- ii. Identify any surface water and/or sediment action levels used to assess the impacts for this pathway and how these were derived. Describe where the DNR action levels were reached or exceeded.

There is no surface water or sediment within the Group A areas.

4. Remedial Actions Implemented and Residual Levels at Closure

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

December 1997: Trent Tube submitted a Remedial Design Report for Hydraulic Control which included a groundwater extraction and treatment system (GETS) using recovery wells RW-1 through RW-7 (Triad, 1997, Remedial Design Report for Hydraulic Control, Trent Tube Plant No. 1, December 1997).

July 1999: The Phase 1 GETS began operation which included pumping/treating groundwater from RW-1 through RW-7. The Final Remedial Closure Plan was also submitted at that time reporting sample results, and proposing soil covers over "direct contact" contaminated soil areas and expansion of the GETS (Triad, 1999, Final Remedial Closure Plan, Trent Tube Plant No. 1, July 1999).

June 2000: Trent Tube submitted the Supplemental Remedial Design Report to WDNR which proposed several additional recovery wells as Phase 2 of the system (Triad, 2000, Supplemental Remedial Design Report for Hydraulic Control, Trent Tube Plant No. 1).

May 2002: Letter from Triad to Crucible Material Corp. outlining an approach for management of contaminated soil on the site. The letter proposes using an Area of Consolidation (AOC) approach. The letter states that this approach has been verbally approved by WDNR (Triad, 2002, Letter from Triad to Crucible Materials Corp Regarding Soil Management Approach, dated May 9, 2002).

November 2002: According to the O&M Manual, Phase 2 GETS wells RW-10 through RW-28 begin operation on November 19, 2002 (Triad, 2003, Operation and Maintenance Manual, Trent Tube Plant No. 1).

February 2003: A Soil Management Plan 2002-2003 was submitted to WDNR. The plan indicated that contaminated soil from the retaining wall/bank stabilization, remediation building expansion, recovery well piping installation, and from a 100-foot section of Honey Creek will be excavated and placed in the AOC (Triad, 2003, Soil Management Plan 2002-2003 Activities, Trent Tube Plant No. 1).

March 2006: A Phytoremediation Monitoring and Maintenance Plan was submitted to WDNR. The report outlined construction and maintenance plans for the AOC and Phytoremediation System and indicated that 10,000 cubic yards of sediment from the banks of Honey Creek would be deposited in the AOC (Symbiont, 2006, Phytoremediation Monitoring

and Maintenance Plan, Trent Tube Plant No. 1, dated March 8, 2006).

November 2012: A Documentation Report for the Flume Vault Abandonment Activities submitted (Symbiont, 2012, Documentation Report, Flume Abandonment Activities, Trent Tube Plant No. 1).

June 2013: A Documentation Report for Remedial Action Plan Activities was submitted. This report covers the period between January 2012 and June 2013. According to this report, 2455 trees were planted onsite in 2013 and 2,800 cubic yards of soil were removed from the MW17 Area (Symbiont, 2013, Documentation Report - Remedial Action Activities - Former Trent Tube Plant No. 1).

In addition to this list of investigation/remedial activities presented, several quarterly and annual O&M reports have been submitted to WDNR starting from approximately 1999 until the current date.

In summary, the most significant remedial work at the Site has included:

- Operation of the Groundwater Pump and Treat System with Quarterly and Annual Performance System Groundwater Reports (1999 - Current);
- Manual Free Product Recovery (2002 - Current, but no free product has been recovered in Group A since July, 2013);
- Area of Consolidation construction which consisted of disposal of remediation materials from various excavation activities including the Honey Creek bank excavation, Honey Creek Sediment Excavation, and the Flume Vault excavation (2006-2009);
- Various Phytoremediation System Installations (2006-2013);
- Concrete/Foundation removal and crushing (2012);
- Flume Vault Excavation and Abandonment (2012); and
- MW17 Area Soil Removal (2013).

B. Describe any immediate or interim actions taken at the site under ch NR 708, Wis. Adm. Code.

During Flume Vault Abandonment Activities in 2011, two product recovery sumps were installed at the southwest corner of the westernmost flume chamber as an interim remedial action. A total of 2,800 cubic yards of material were removed from the MW17 Area as an interim remedial action in 2013.

C. Describe the *active* remedial actions taken at the source property, including: type of remedial system(s) used for each media affected; the size and location of any excavation or in-situ treatment; the effectiveness of the systems to address the contaminated media and substances; operational history of the systems; and summarize the performance of the active remedial actions. Provide any system performance documentation in Attachment A.7.

A groundwater extraction and treatment system (GETS) has been operating at the Trent Tube Plant 1 site since July 1999 using a network of 26 recovery wells (RW1 through RW7 and RW10 through RW28). Extracted water is treated by air stripping and activated carbon and then discharged to Honey Creek under the General WPDES Permit No. WI-0046566-6. The objective of the GETS is to provide hydraulic control of contaminated groundwater entering Honey Creek. The GETS has generally operated as designed and has maintained compliance with discharge permit requirements.

Following pilot studies and initial testing, in 2012/2013 a site-wide phytoremediation system was installed as a final remedial closure for portions of the Trent Tube Plant 1 site, including certain areas in Group A.

D. Describe the alternatives considered during the Green and Sustainable Remediation evaluation in accordance with NR 722.09 and any practices implemented as a result of the evaluation.

The implementation of phytoremediation at the site is considered green and sustainable due to the minimization of energy use and partially eliminating greenhouse gas generation.

E. Describe the nature, degree and extent of residual contamination that will remain at the source property or on other affected properties after case closure.

Residual contamination that will remain at the Group A property after case closure is described as:

- TCE in soil is above the groundwater protection RCL (3.6 µg/kg) in the MW17 Area (GA-SA7: 39.3J µg/kg).
- Nickel in soil is above the groundwater protection RCL (13,060 µg/kg) at the MW17 Area (GA-SA7: 87,100 µg/kg) and the GP18 Area (GA-SA1: 100,000 µg/kg, GA-SA3: 98,900 µg/kg, GA-SA4: 77,700µg/kg, GA-SA5: 155,000 µg/kg and GA-SA6: 52,200 µg/kg).
- Selenium in soil is above the groundwater protection RCL (520 µg/kg) at the MW17 Area (GA-SA7: 1,400J µg/kg)), the GP18 Area (GA-SA1: 1,600J µg/kg and GA-SA3: 1,400J µg/kg) and the MW16/Flume Area (GA-SA8: 1,200J µg/kg).

Groundwater contamination currently exceeds the ES for VOCs in the MW16/Flume Area and the MW17 Area:

- In MW16, the ES for TCE (5 µg/L) is exceeded with a concentration of 72.2 µg/L.
- In RW8, the ES for cis-1,2-dichloroethene (70 µg/L) is exceeded with a concentration of 361 µg/L, the ES for 1,1-dichloroethene (7 µg/L) is exceeded with a concentration of 13.7 µg/L, the ES for TCE (5µg/L) is exceeded with a concentration of 498 µg/L and the ES for vinyl chloride (0.2 µg/L) is exceeded with a concentration of 6.2 µg/L.
- In MW17R, the ES for cis-1,2-dichloroethene (70 µg/L) is exceeded with a concentration of 158 µg/L, the ES for TCE (5µg/L) is exceeded with a concentration of 964 µg/L and the ES for vinyl chloride (0.2 µg/L) is exceeded with a concentration of 21.8 µg/L.

- In MW37R, the ES for TCE (5 µg/L) is exceeded with a concentration of 14 µg/L.

Groundwater contamination currently exceeds the PAL for VOCs in the MW16/Flume Area and the MW17 Area:

- In MW16, the PAL for 1,1-dichloroethene (0.7 µg/L) is exceeded with a concentration of 1.7 µg/L, the PAL for cis-1,2-dichloroethene (7 µg/L) is exceeded with a concentration of 22.4 µg/L, the PAL for 1,1,1-trichloroethane (40 µg/L) is exceeded with a concentration of 92.9 µg/L, the PAL for tetrachloroethene (0.5 µg/L) is exceeded with a concentration of 0.67J µg/L and the PAL for vinyl chloride (0.02 µg/L) is exceeded with a concentration of 0.18J µg/L.
- In RW8, the PAL for 1,1,1-trichloroethane (40 µg/L) is exceeded with a concentration of 178 µg/L.
- In MW17R, the PAL for trans-1,2-dichloroethene (20 µg/L) is exceeded with a concentration of 41.9 µg/L and the PAL for tetrachloroethene (0.5 µg/L) is exceeded with a concentration of 4.1J µg/L.

Arsenic exceeds the ES (10 µg/L) in MW17R with a concentration of 20.5 µg/L in MW17R. Chromium exceeds the PAL (10 µg/L) with a concentration of 10.7 µg/L in MW21. Nickel exceeds the PAL (20 µg/L) with a concentration of 24.4 µg/L in MW17R and a concentration of 40.6 in MW21. Selenium exceeds the PAL (10 µg/L) with a concentration of 10.2J µg/L in MW21.

- F. Describe the residual soil contamination within four feet of ground surface (direct contact zone) that attains or exceeds RCLs established under s. NR 720.12, Wis. Adm. Code, for protection of human health from direct contact.

With the exception of arsenic (see B.i. response), no residual soil contamination within four feet of ground surface exceeds non-industrial direct contact RCLs at the time of closure.

- G. Describe the residual soil contamination that is above the observed low water table that attains or exceeds the soil standard(s) for the groundwater pathway.

One soil sample taken in November 2017 in the MW17 Area (GA-SA7) exceeds the groundwater protection RCL for TCE (3.6 µg/kg) at 39.3J µg/kg.

Concentrations of nickel in soil exceeded the groundwater protection RCL (13,060 µg/kg) in samples collected in November 2016 in the MW17 Area (87,100 µg/kg) and in the GP18 Area (155,000 µg/kg). Concentrations of selenium in soil exceeded the groundwater protection RCL (520 µg/kg) in samples collected in November 2016 in the MW17 Area (1,400J µg/kg), in the GP18 Area (1,600J µg/kg) and in the MW16/Flume Area (1,200J µg/kg).

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

VOCs in groundwater will be addressed by the continued operation of the GETS, which is designed to provide hydraulic control of the groundwater plume, and the phytoremediation system in Group A. Residual soil contamination consists of one sample (39.3J µg/kg) which exceeds the groundwater protection RCL. This pathway will be similarly addressed by the GETS and ongoing groundwater monitoring of wells in the Group A Area. MW17R will continue to be monitored for VOCs to confirm that concentrations do not increase over time.

Metals in groundwater will be addressed by monitoring metals in wells MW21, MW17R, MW37, MW16 and RW8 to confirm that concentrations do not increase over time. Residual soil contamination exceeding the groundwater protection RCL will be similarly addressed by ongoing groundwater monitoring.

The site will be included in the WDNR's GIS Registry for soil and groundwater contamination.

- I. If using natural attenuation as a groundwater remedy, describe how the data collected supports the conclusion that natural attenuation is effective in reducing contaminant mass and concentration (e.g., stable or receding groundwater plume).

Not applicable.

- J. Identify how all exposure pathways (soil, groundwater, vapor) were removed and/or adequately addressed by immediate, interim and/or remedial action(s).

The groundwater pathway is adequately addressed by the GETS, which has been in operation since 1999, and the phytoremediation system. In addition, the soil to groundwater pathway is not complete because of the presence of the lower confining silt/till layer from deeper water accessed by the nearest water supply wells.

- K. Identify any system hardware anticipated to be left in place after site closure, and explain the reasons why it will remain.

The GETS remediation system and the phytoremediation system will remain in place after Group A site closure to maintain hydraulic control of the groundwater plume, treat extracted groundwater and further inhibit migration to Honey Creek.

- L. Identify the need for a ch. NR 140, Wis. Adm. Code, groundwater Preventive Action Limit (PAL) or Enforcement Standard (ES) exemption, and identify the affected monitoring points and applicable substances.

MW16/Flume Area

ES exemptions for: 1,1-Dichloroethene (RW8), cis-1,2-Dichloroethene (RW8), Trichloroethene (MW16 and RW8) and Vinyl chloride (RW8). PAL exemptions for: cis-1,2-Dichloroethene (MW16), 1,1-Dichloroethene (MW16), Tetrachloroethene (MW16), 1,1,1-Trichloroethane (MW16 and RW8) and Vinyl chloride (MW16).

MW17 Area

ES exemptions for: cis-1,2-Dichloroethene (MW17R), Trichloroethene (MW17R), Vinyl chloride (MW17R) and Arsenic (MW17R). PAL exemptions for: trans-1,2-Dichloroethene (MW17R), Tetrachloroethene (MW17R) and Nickel (MW17R).

GP18 Area

PAL exemptions for: Chromium (MW21), Nickel (MW21) and Selenium (MW21).

M. If a DNR action level for vapor intrusion was exceeded (for indoor air, sub slab, or both) describe where it was exceeded and how the pathway was addressed.

Not applicable.

N. Describe the surface water and/or sediment contaminant concentrations and areas after remediation. If a DNR action level was exceeded, describe where it was exceeded and how the pathway was addressed.

Not applicable.

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

Directions: For each of the 3 property types below, check all situations that apply to this closure request.

(NOTE: Monitoring wells to be transferred to another site are addressed in Attachment E.)

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

6. Underground Storage Tanks

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

General Instructions

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

Data Tables (Attachment A)**Directions for Data Tables:**

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

A. Data Tables

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

Maps, Figures and Photos (Attachment B)**Directions for Maps, Figures and Photos:**

- Provide on paper no larger than 11 x 17 inches, unless otherwise directed by the Department. Maps and figures may be submitted in a larger electronic size than 11 x 17 inches, in a PDF readable by the Adobe Acrobat Reader. However, those larger-size documents must be legible when printed.
- Prepare visual aids, including maps, plans, drawings, fence diagrams, tables and photographs according to the applicable portions of ss. NR 716.15(4), 726.09(2) and 726.11(3), (5) and (6), Wis. Adm. Code.
- Include all sample locations.
- Contour lines should be clearly labeled and defined.
- Include in Attachment B all of the following maps and figures, in the order prescribed below, with the specific Closure Form titles noted on the separate attachments (e.g., Title: B.1. Location Map; B.2. Detailed Site Map, etc).
- For the electronic copies that are required, each map (e.g., B.1.a., B.2.a, etc.,) should be a separate PDF.
- Maps, figures and photos should be dated to reflect the most recent revision.

B.1. Location Maps

- B.1.a. **Location Map:** A map outlining all properties within the contaminated site boundaries on a United States Geological Survey (U.S.G.S.) topographic map or plat map in sufficient detail to permit easy location of all affected and/or adjacent parcels. If groundwater standards are exceeded, include the location of all potable wells, including municipal wells, within 1200 feet of the area of contamination.
- B.1.b. **Detailed Site Map:** A map that shows all relevant features (buildings, roads, current ground surface cover, individual property boundaries for all affected properties, contaminant sources, utility lines, monitoring wells and potable wells) within the contaminated area. This map is to show the location of all contaminated public streets, and highway and railroad rights-of-way in relation to the source property and in relation to the boundaries of groundwater contamination attaining or exceeding a ch. NR 140 ES, and/or in relation to the boundaries of soil contamination attaining or exceeding a RCL. Provide parcel identification numbers for all affected properties.
- B.1.c. **RR Sites Map:** From RR Sites Map ([http://dnrmaps.wi.gov/sl/?Viewer=RR Sites](http://dnrmaps.wi.gov/sl/?Viewer=RR%20Sites)) attach a map depicting the source property, and all open and closed BRRTS sites within a half-mile radius or less of the property.

B.2. Soil Figures

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

B.3. Groundwater Figures

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

B.4. Vapor Maps and Other Media

- B.4.a. **Vapor Intrusion Map:** Map(s) showing all locations and results for samples taken to investigate the vapor intrusion pathway in relation to residual soil and groundwater contamination, including sub-slab, indoor air, soil vapor, soil gas, ambient air, and communication testing. Show locations and footprints of affected structures and utility corridors, and/or where residual contamination poses a future risk of vapor intrusion.
- B.4.b. **Other media of concern (e.g., sediment or surface water):** Map(s) showing all sampling locations and results for other media investigation. Include the date of sample collection and identify where any standards are exceeded.
- B.4.c. **Other:** Include any other relevant maps and figures not otherwise noted above. (This section may remain blank).

- B.5. Structural Impediment Photos:** One or more photographs documenting the structural impediment feature(s) which precluded a complete site investigation or remediation at the time of the closure request. The photographs should document the area that could not be investigated or remediated due to a structural impediment. The structural impediment should be indicated on Figures B.2.a and B.2.b.

Documentation of Remedial Action (Attachment C)**Directions for Documentation of Remedial Action:**

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

Maintenance Plan(s) and Photographs (Attachment D)**Directions for Maintenance Plans and Photographs:**

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

- D.1. Descriptions of maintenance action(s) required for maximizing effectiveness of the engineered control, vapor mitigation system, feature or other action for which maintenance is required:**
- Provide brief descriptions of the type, depth and location of residual contamination.

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

Monitoring Well Information (Attachment E)

Directions for Monitoring Well Information:

For all wells that will remain in use, be transferred to another party, or that could not be located; attach monitoring well construction and development forms (DNR Form 4400-113 A and B: http://dnr.wi.gov/topic/groundwater/documents/forms/4400_113_1_2.pdf)

Select One:

- No monitoring wells were installed as part of this response action.
- All monitoring wells have been located and will be properly abandoned upon the DNR granting conditional closure to the site
- Select One or More:**
- Not all monitoring wells can be located, despite good faith efforts. Attachment E must include a description of efforts made to locate the wells.
- One or more wells will remain in use at the site after this closure. Attachment E must include documentation as to the reason (s) the well(s) will remain in use. When one or more monitoring wells will remain in use this is considered a continuing obligation and a maintenance plan will be required and must be included in Attachment D.
- One or more monitoring wells will be transferred to another owner upon case closure being granted. Attachment E should include documentation identifying the name, address and email for the new owner(s). Provide documentation from the party accepting future responsibility for monitoring well(s).

Source Legal Documents (Attachment F)

Directions for Source Legal Documents:

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

- F.1. **Deed:** The most recent deed with legal description clearly listed.
- Note: If a property has been purchased with a land contract and the purchaser has not yet received a deed, a copy of the land contract which includes the legal description shall be submitted instead of the most recent deed. If the property has been inherited, written documentation of the property transfer should be submitted along with the most recent deed.*
- F.2. **Certified Survey Map:** A copy of the certified survey map or the relevant section of the recorded plat map for those properties where the legal description in the most recent deed refers to a certified survey map or a recorded plat map. In cases where the certified survey map or recorded plat map are not legible or are unavailable, a copy of a parcel map from a county land information office may be substituted. A copy of a parcel map from a county land information office shall be legible, and the parcels identified in the legal description shall be clearly identified and labeled with the applicable parcel identification number.
- F.3. **Verification of Zoning:** Documentation (e.g., official zoning map or letter from municipality) of the property's or properties' current zoning status.
- F.4. **Signed Statement:** A statement signed by the Responsible Party (RP), which states that he or she believes that the attached legal description(s) accurately describe(s) the correct contaminated property or properties. This section applies to the source property only. Signed statements for Other Affected Properties should be included in Attachment G.

Notifications to Owners of Affected Properties (Attachment G)**Directions for Notifications to Owners of Affected Properties:**

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

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

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

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

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

Signatures and Findings for Closure Determination

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

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

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

Engineering Certification

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

Printed Name Title

Signature Date P.E. Stamp and Number

Hydrogeologist Certification

I Richard J. Rudy (WI PG #1336) hereby certify that I am a hydrogeologist as that term is defined in s. NR 712.03 (1), Wis. Adm. Code, and that, to the best of my knowledge, all of the information contained in this case closure request is correct and the document was prepared by me or prepared by me or prepared under my supervision and, in compliance with all applicable requirements in chs. NR 700 to 726, Wis. Adm. Code. Specifically, with respect to compliance with the rules, in my professional opinion a site investigation has been conducted in accordance with ch. NR 716, Wis. Adm. Code, and all necessary remedial actions have been completed in accordance with chs. NR 140, NR 718, NR 720, NR 722, NR 724 and NR 726, Wis. Adm. Codes."

Richard J. Rudy
Printed Name Project Director
Title

[Signature]
Signature 3-27-2017
Date

Attachment A

Data Tables

BRRTS No. 02-65-245827
 Group A Site Closure
 Trent Tube Plant 1
 2188 Church Street
 East Troy, Wisconsin

| Table of Contents | |
|---|----------------|
| Closure Form Title | Applicability |
| A.1. Groundwater Analytical Table | Applicable |
| A.2. Soil Analytical Results Table | Applicable |
| A.3. Residual Soil Contamination Table | Applicable |
| A.4. Vapor Analytical Table | Not Applicable |
| All buildings at the Trent Tube Plant 1 site have been demolished, including the Group A area. No vapor analytical data has been collected. | |
| A.5. Other Media of Concern | Not Applicable |
| No surface water or sediment is present in the Group A area. | |
| A.6. Water Level Elevations | Applicable |
| A.7. Other | Not Applicable |
| The Group A area groundwater is captured by the phytoremediation system or the GETS, both of which are operational at the site. A complete annual Remediation Site Operation, Maintenance, Monitoring & Optimization Report (Form 4400-194 with attachments) was submitted to the WDNR covering the period 7/1/2015 to 6/30/2016 which included data tables/graphs for the GETS, free product recovery and phytoremediation system. | |

Table A.1
Group A Closure – Groundwater Analytical Tables
Trent Tube Plant No. 1
2188 Church Street, East Troy, Wisconsin

Explanation

| | |
|--------------|---|
| TOC – | Total Organic Carbon |
| NA – | Not analyzed |
| NE - | Not established |
| NR - | Not reported |
| < - | Analyte not detected at quantitation limit – not detected |
| J - | Estimated |
| PAL - | Preventive Action Limit |
| ES - | Enforcement Standard |
| <i>123</i> - | Italics indicates exceedance of Preventive Action Limit |
| 123 - | Bold indicates exceedance of Enforcement Standard |
| TOC - | Total organic carbon |
| HP - | Hydraulic probe |
| GP - | Geoprobe |
| MW - | Monitoring well |
| RW - | Recovery well |

All concentration values are in µg/L unless noted.

Table A.1
Group A Closure – Groundwater Analytical Tables - Volatile Organic Compounds
Single Event Samples from Hydropunch and Geoprobe Points
Trent Tube Plant No. 1
2188 Church Street, East Troy, Wisconsin

| Sample Name | Sample Date | Benzene | Carbon disulfide | Chloroethane | Chloroform | 1,1-Dichloroethane | 1,2-Dichloroethane | 1,1,1-Dichloroethane | cis-1,2-Dichloroethane | trans-1,2-Dichloroethane | Ethylbenzene | Isopropylbenzene | Naphthalene (8260) | n-Propylbenzene | Tetrachloroethane | Toluene | 1,1,1-Trichloroethane | 1,1,2-Trichloroethane | Trichloroethane | 1,2,4-Trimethylbenzene | 1,3,5-Trimethylbenzene | Trimethylbenzene | Vinyl chloride | o-Xylene | m+p Xylene | Xylenes (total) | |
|-------------------------|-------------|---------|------------------|--------------|------------|--------------------|--------------------|----------------------|------------------------|--------------------------|--------------|------------------|--------------------|-----------------|-------------------|---------|-----------------------|-----------------------|-----------------|------------------------|------------------------|------------------|----------------|----------|------------|-----------------|----|
| PAL | | 0.5 | 200 | 80 | 0.6 | 85 | 0.5 | 0.7 | 7 | 20 | 140 | NE | 10 | NE | 0.5 | 160 | 40 | 0.5 | 0.5 | NE | NE | 96 | 0.02 | NE | NE | 0.4 | |
| ES | | 5 | 1000 | 400 | 6 | 850 | 5 | 7 | 70 | 100 | 700 | NE | 100 | NE | 5 | 800 | 200 | 5 | 5 | NE | NE | 480 | 0.2 | NE | NE | 2 | |
| MW-17 Area | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| GP-14 | 4/23/96 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | <1 | NA | NA | NA | 220 | NA | NA | NA | NA | NA | NA | NA | NA |
| GP-19 | 4/24/96 | <1 | NA | <1 | <1 | 23 | 3.5 | 27 | 750 | <1 | <1 | <1 | <1 | <1 | 8.6 | 1.5 | 30 | 2.3 | 115000 | <1 | <1 | <1 | 4.7 | <1 | <2 | <3 | NA |
| HP-18 | 11/16/98 | <0.5 | <1 | <1 | <0.5 | <1 | <0.5 | <0.5 | <1 | <1 | <1 | <1 | <1 | <1 | <0.5 | 2.2 | <1 | <0.5 | 100 | <1 | <1 | <1 | <0.2 | NA | NA | 2.3 | |
| HP-19 | 11/16/98 | <0.5 | <1 | <1 | <0.5 | <1 | <0.5 | <0.5 | <1 | <1 | <1 | <1 | <1 | <1 | <0.5 | <1 | <1 | <0.5 | 2.4 | <1 | <1 | <1 | <0.2 | NA | NA | 2.3 | |
| HP-20 | 11/16/98 | <0.5 | <1 | <1 | <0.5 | <1 | <0.5 | <0.5 | <1 | <1 | <1 | <1 | <1 | <1 | <0.5 | <1 | <1 | <0.5 | <1 | <1 | <1 | <1 | <0.2 | NA | NA | <1 | |
| HP-22 | 11/16/98 | <0.5 | <1 | <1 | <0.5 | <1 | <0.5 | <0.5 | <1 | <1 | <1 | <1 | <1 | <1 | <0.5 | <1 | <1 | <0.5 | 5.8 | <1 | <1 | <1 | 4.5 | NA | NA | <1 | |
| HP-24 | 11/16/98 | <0.5 | <1 | <1 | <0.5 | 9.6 | <0.5 | 6.6 | 222 | 2.1 | <1 | <1 | <1 | <1 | 4.9 | <1 | 18 | <0.5 | 3650 | <1 | <1 | <1 | 14 | NA | NA | <1 | |
| HP-73 | 11/17/98 | <0.5 | <1 | <1 | <0.5 | <1 | <0.5 | <0.5 | <1 | <1 | <1 | <1 | <1 | <1 | <0.5 | <1 | <1 | <0.5 | <1 | <1 | <1 | <1 | <0.2 | NA | NA | <1 | |
| GeoP14 | 10/7/15 | <0.5 | NA | <0.37 | <2.5 | <0.24 | <0.17 | <0.41 | 0.54 J | <0.26 | <0.5 | <0.14 | <2.5 | <0.5 | <0.5 | <0.5 | 0.52 J | <0.2 | 14.4 | <0.5 | <0.5 | NA | <0.18 | <0.5 | <1 | NA | |
| GeoP15 | 10/7/15 | <0.5 | NA | <0.37 | <2.5 | <0.24 | <0.17 | <0.41 | 0.83 J | <0.26 | <0.5 | <0.14 | <2.5 | <0.5 | <0.5 | <0.5 | <0.5 | <0.2 | 6.5 | <0.5 | <0.5 | NA | <0.18 | <0.5 | <1 | NA | |
| GP-18 Area | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| GP-18 | 4/24/96 | 1.7 | NA | <1 | <1 | <1 | <1 | <1 | <1 | <1 | 3.6 | <1 | <1 | <1 | 6.7 | 2.4 | <1 | <1 | 67 | <1 | <1 | <1 | <1 | 6.8 | 19 | 25.8 | |
| HP-66 | 11/16/98 | <0.5 | <1 | <1 | <1 | <0.5 | <0.5 | <0.5 | <1 | <1 | <1 | <1 | <1 | <1 | <0.5 | <1 | 5 | <0.5 | <1 | <1 | <1 | <1 | <0.2 | NA | NA | <1 | |
| MW-16/Flume Area | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| GP-12 | 4/23/96 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | 15 | NA | NA | NA | NA | NA | NA | NA | NA |
| GP-13 | 4/23/96 | <100 | NA | <100 | <100 | 400 | <100 | 7600 | 5000 | <100 | <100 | <100 | 33000 | <100 | <100 | 160 | 180000 | <100 | 44000 | 550 | 240 | 790 | <100 | <100 | <200 | <300 | |
| GP-17 | 4/23/96 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | <1 | NA | NA | NA | 780 | NA | NA | NA | NA | NA | NA | NA | |
| GP-20 | 4/25/96 | <1 | NA | <1 | <1 | 3.1 | <1 | <1 | 22 | <1 | <1 | <1 | <1 | <1 | <1 | <1 | 11 | <1 | 2800 | <1 | <1 | <1 | <1 | <1 | <2 | <3 | |
| HP-26 | 11/17/98 | <0.5 | <5 | <5 | <5 | <0.5 | <0.5 | <0.5 | <5 | <5 | <5 | <5 | <5 | <5 | <0.5 | <5 | 115 | <0.5 | 415 | <5 | <5 | <5 | <0.2 | NA | NA | <5 | |
| HP-27 | 11/16/98 | <0.5 | <1 | <1 | <1 | 16 | <0.5 | 11 | 120 | <1 | <1 | <1 | <1 | <1 | 4.4 | <1 | 252 | <0.5 | 4200 | <1 | <1 | <1 | <0.2 | NA | NA | <1 | |
| HP-28 | 11/17/98 | <10000 | <10000 | <10000 | <10000 | <10000 | <10000 | <10000 | <10000 | <10000 | <10000 | <10000 | <10000 | <10000 | <10000 | <10000 | 208000 | <10000 | 130000 | <10000 | <10000 | <10000 | <10000 | NA | NA | <10000 | |
| HP-69 | 11/17/98 | <0.5 | <1 | <1 | <1 | 7.6 | <0.5 | 4.8 | 8.6 | <1 | <1 | <1 | <1 | <1 | <0.5 | <1 | 177 | <0.5 | 89 | <1 | <1 | <1 | <0.2 | NA | NA | <1 | |
| Flume Well | 6/23/16 | <0.5 | NA | <0.37 | <2.5 | <0.24 | <0.17 | <0.41 | 0.36 J | <0.26 | <0.5 | <0.14 | <2.5 | <0.5 | <0.5 | <0.5 | <0.5 | <0.2 | 6.8 | <0.5 | <0.5 | NA | <0.18 | <0.5 | <1 | NA | |

Table A.1
Group A Closure – Groundwater Analytical Tables - Volatile Organic Compounds
Monitoring Wells and Recovery Wells
Trent Tube Plant No. 1
2188 Church Street, East Troy, Wisconsin

| Well Name | Sample Date | Acetone | Benzene | Bromochloromethane | Bromodichloromethane | Bromoform | n-Butylbenzene | sec-Butylbenzene | tert-Butylbenzene | Carbon disulfide | Carbon tetrachloride | Chloroethane | Chloroform | 2-Chlorotoluene | 4-Chlorotoluene | 1,1-Dichloroethane | 1,2-Dichloroethane | 1,1-Dichloroethene | cis-1,2-Dichloroethene | trans-1,2-Dichloroethene | Ethylbenzene | Hexachlorobutadiene | Isopropylbenzene |
|-------------------|-------------|-------------|----------|--------------------|----------------------|------------|----------------|------------------|-------------------|------------------|----------------------|--------------|------------|-----------------|-----------------|--------------------|--------------------|--------------------|------------------------|--------------------------|--------------|---------------------|------------------|
| MW-17 Area | | | | | | | | | | | | | | | | | | | | | | | |
| | PAL | 1800 | 0.5 | NE | 0.06 | 0.4 | NE | NE | NE | 200 | 0.5 | 80 | 0.6 | NE | NE | 85 | 0.5 | 0.7 | 7 | 20 | 140 | NE | NE |
| | ES | 9000 | 5 | NE | 0.6 | 4.4 | NE | NE | NE | 1000 | 5 | 400 | 6 | NE | NE | 850 | 5 | 7 | 70 | 100 | 700 | NE | NE |
| MW-18 | 6/19/96 | NR | <1 | <1 | NA | 4 | <1 | <1 | <1 | NA | NA | <1 | <1 | <1 | <1 | 13 | <1 | <1 | 178 | 3 | <1 | <1 | <1 |
| | 7/17/96 | NR | <1 | <1 | NA | <1 | <1 | <1 | <1 | NA | NA | <1 | <1 | <1 | <1 | 30 | <1 | 6 | 400 | 7 | <1 | <1 | <1 |
| | 10/15/96 | NR | <0.5 | <1 | NA | <1 | <1 | <1 | <1 | NA | NA | <1 | <0.5 | <1 | <1 | 41 | <0.5 | 4 | 325 | 7 | <1 | <1 | <1 |
| | 1/15/97 | NR | <0.5 | <1 | NA | <1 | <1 | <1 | <1 | NA | NA | <1 | <0.5 | <1 | <1 | 39 | <0.5 | 3 | 400 | 6 | <1 | <1 | <1 |
| | 4/9/97 | NR | <0.5 | <1 | NA | <1 | <1 | <1 | <1 | NA | NA | <1 | <0.5 | <1 | <1 | 29 | <0.5 | 4 | 370 | 6 | <1 | <1 | <1 |
| | 7/16/97 | NR | <0.5 | <1 | NA | <1 | <1 | <1 | <1 | NA | NA | <1 | <0.5 | <1 | <1 | 24 | <0.5 | 4 | 320 | 5 | <1 | <1 | <1 |
| | 10/1/97 | NR | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| | 1/28/98 | <0.5 | <0.5 | <1 | NA | <1 | <1 | <1 | <1 | NA | NA | <1 | 1.2 | <1 | <1 | 17.7 | <0.5 | 2.5 | 220 | 3.9 | <1 | <1 | <1 |
| | 4/20/98 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| | 7/20/98 | <0.5 | <0.5 | <1 | NA | <1 | <1 | <1 | <1 | NA | NA | <1 | <0.5 | <1 | <1 | <1 | <0.5 | <0.5 | 13.2 | <0.5 | <1 | <1 | <1 |
| | 10/6/98 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| | 2/2/99 | <0.5 | <0.5 | <1 | NA | <1 | <1 | <1 | <1 | NA | NA | <1 | <0.5 | <1 | <1 | <1 | <0.5 | <0.5 | 19.4 | <0.5 | <1 | <1 | <1 |
| | 4/27/99 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| | 7/27/99 | <0.5 | <0.5 | <1 | NA | <1 | <1 | <1 | <1 | NA | NA | <1 | <0.5 | <1 | <1 | <1 | <0.5 | <0.5 | 28.9 | <0.5 | <1 | <1 | <1 |
| | 11/1/99 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| | 5/8/00 | <0.5 | <0.5 | <1 | NA | <1 | <1 | <1 | <1 | NA | <0.5 | <1 | 1.2 | <1 | <1 | 1 | <0.5 | <0.5 | 14.3 | <0.5 | <1 | <1 | <1 |
| | 8/16/00 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| | 11/6/00 | <10 | <0.5 | <1 | NA | <1 | <1 | <1 | <1 | NA | <0.5 | <1 | <0.5 | <1 | <1 | 1.3 | <0.5 | <0.5 | 20.1 | <0.5 | <1 | <1 | <1 |
| | 5/4/01 | <25 | <0.5 | <1 | NA | <1 | <1 | <1 | <1 | NA | <0.5 | <1 | <0.5 | <1 | <1 | <1 | <0.5 | <0.5 | 2.5 | <0.5 | <1 | <1 | <1 |
| | 10/8/01 | <25 | <0.5 | <1 | NA | <1 | <1 | <1 | <1 | NA | <0.5 | <1 | <0.5 | <1 | <1 | <1 | <0.5 | <0.5 | 4.9 | <0.5 | <1 | <1 | <1 |
| | 5/2/02 | <1.54 | <0.31 | <0.16 | NA | <0.12 | <0.12 | <0.08 | <0.06 | NA | <0.5 | <0.06 | <0.06 | <0.06 | <0.06 | <0.05 | <0.21 | <0.06 | 1.87 | <0.1 | <0.22 | <0.26 | <0.06 |
| | 11/5/02 | <1.54 | <0.31 | <0.16 | NA | <0.12 | <0.12 | <0.08 | <0.06 | NA | <0.5 | <0.06 | <0.06 | <0.06 | <0.06 | 0.44 | <0.21 | <0.06 | 5.38 | 0.24 | <0.22 | <0.26 | <0.06 |
| | 5/12/03 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| | 5/3/04 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| | 5/12/05 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| | 8/11/05 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| | 11/8/05 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| | 2/8/06 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| | 6/5/06 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| | 8/8/06 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| | 11/15/06 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| | 5/24/07 | <7.41 | <0.33 | <0.7 | NA | <0.54 | <0.78 | <0.26 | <0.4 | NA | <0.41 | <0.35 | <0.51 | <0.21 | <0.41 | <0.6 | <0.46 | <0.27 | <0.54 | <0.2 | <0.42 | <0.66 | <0.41 |

**Table A.1
Group A Closure – Groundwater Analytical Tables - Volatile Organic Compounds
Monitoring Wells and Recovery Wells
Trent Tube Plant No. 1
2188 Church Street, East Troy, Wisconsin**

| Well Name | Sample Date | p-Isopropyltoluene | Methyl chloride | Methylene chloride | Naphthalene | n-Propylbenzene | Styrene | Tetrachloroethene | Toluene | 1,2,3-Trichlorobenzene | 1,2,4-Trichlorobenzene | 1,1,1-Trichloroethane | 1,1,2-Trichloroethane | Trichloroethene | 1,2,4-Trimethylbenzene | 1,3,5-Trimethylbenzene | Trimethylbenzenes (total) | Vinyl chloride | M+p-Xylene | o-Xylene | Xylenes (total) | Methyl butyl ketone | Methyl isobutyl ketone | Methyl ethyl ketone |
|-------------------|-------------|--------------------|-----------------|--------------------|-------------|-----------------|------------|-------------------|------------|------------------------|------------------------|-----------------------|-----------------------|-----------------|------------------------|------------------------|---------------------------|----------------|------------|-----------|-----------------|---------------------|------------------------|---------------------|
| MW-17 Area | | | | | | | | | | | | | | | | | | | | | | | | |
| | PAL | <i>NE</i> | 3 | <i>0.5</i> | <i>10</i> | <i>NE</i> | <i>10</i> | <i>0.5</i> | <i>160</i> | <i>NE</i> | <i>14</i> | <i>40</i> | <i>0.5</i> | <i>0.5</i> | <i>NE</i> | <i>NE</i> | <i>96</i> | <i>0.02</i> | <i>NE</i> | <i>NE</i> | <i>0.4</i> | <i>NE</i> | <i>50</i> | <i>0.8</i> |
| | ES | NE | 30 | 5 | 40 | NE | 100 | 5 | 800 | NE | 70 | 200 | 5 | 5 | NE | NE | 480 | 0.2 | NE | NE | 2 | NE | 500 | 4 |
| MW-18 | 6/19/96 | <1 | NA | <1 | <1 | <1 | NA | <1 | <1 | <1 | <1 | <1 | <1 | 686 | <1 | <1 | <1 | 16 | <1 | <1 | <1 | NA | NA | NA |
| | 7/17/96 | <1 | NA | <1 | <1 | <1 | NA | 2 | <1 | <1 | <1 | 11 | <1 | 7100 | <1 | <1 | <1 | 25 | <1 | <1 | <1 | NA | NA | NA |
| | 10/15/96 | <1 | NA | <0.5 | <1 | <1 | NA | 1 | <1 | <1 | <1 | 7 | <0.5 | 1000 | <1 | <1 | <1 | 54 | <1 | <1 | <1 | NA | NA | NA |
| | 1/15/97 | <1 | NA | 3 | <1 | <1 | NA | <0.5 | <1 | <1 | <1 | 5 | <0.5 | 930 | <1 | <1 | <1 | 61 | <1 | <1 | <1 | NA | NA | NA |
| | 4/9/97 | <1 | NA | <0.5 | <1 | <1 | NA | <0.5 | <1 | <1 | <1 | 6 | <0.5 | 960 | <1 | <1 | <1 | 69 | <1 | <1 | <1 | NA | NA | NA |
| | 7/16/97 | <1 | NA | <0.5 | <1 | <1 | NA | <0.5 | <1 | <1 | <1 | 4 | <0.5 | 610 | <1 | <1 | <1 | 42 | <1 | <1 | <1 | NA | NA | NA |
| | 10/1/97 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| | 1/28/98 | <1 | NA | <0.5 | <1 | <1 | NA | <0.5 | <1 | <1 | <1 | 3.6 | <0.5 | 740 | <1 | <1 | <1 | 11.9 | NA | NA | <1 | NA | NA | NA |
| | 4/20/98 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| | 7/20/98 | <1 | NA | <0.5 | <1 | <1 | NA | <0.5 | <1 | <1 | <1 | <0.5 | <0.5 | 628 | <1 | <1 | <1 | <0.2 | NA | NA | <1 | NA | NA | NA |
| | 10/6/98 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| | 2/2/99 | <1 | NA | <0.5 | <1 | <1 | NA | <0.5 | <1 | <1 | <1 | <0.5 | <0.5 | 258 | <1 | <1 | <1 | <0.2 | NA | NA | <1 | NA | NA | NA |
| | 4/27/99 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| | 7/27/99 | <1 | NA | <0.5 | <1 | <1 | NA | <0.5 | <1 | <1 | <1 | <0.5 | <0.5 | 487 | <1 | <1 | <1 | <0.2 | NA | NA | <1 | NA | NA | NA |
| | 11/1/99 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| | 5/8/00 | <1 | NA | <0.5 | <2.5 | <1 | NA | <0.5 | <1 | <1 | <1 | <0.5 | <0.5 | 272 | <1 | <1 | <1 | <0.2 | NA | NA | <1 | NA | <5 | NA |
| | 8/16/00 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| | 11/6/00 | <1 | NA | <0.5 | <2.5 | <1 | NA | <0.5 | <1 | <1 | <1 | <0.5 | <0.5 | 505 | <1 | <1 | <1 | <0.2 | <1 | <1 | <1 | NA | <10 | NA |
| | 5/4/01 | <1 | NA | <0.5 | <2.5 | <1 | NA | <0.5 | <1 | <1 | <1 | <0.5 | <0.5 | 142 | <1 | <1 | <1 | <0.2 | NA | NA | <1 | NA | <10 | NA |
| | 10/8/01 | <1 | NA | <0.5 | <2.5 | <1 | NA | <0.5 | <1 | <1 | <1 | <0.5 | <0.5 | 227 | <1 | <1 | <1 | <0.2 | NA | NA | <1 | NA | <10 | NA |
| | 5/2/02 | <0.08 | NA | 1.27 | <0.17 | <0.05 | NA | <0.09 | <0.05 | <0.11 | <0.05 | <0.06 | <0.09 | 105 | <0.05 | <0.06 | <0.05 | <0.08 | NA | NA | <0.44 | NA | <0.46 | NA |
| | 11/5/02 | <0.08 | NA | <0.1 | <0.17 | <0.05 | NA | 0.53 | <0.05 | <0.11 | <0.05 | <0.06 | <0.09 | 345 | <0.05 | <0.06 | <0.05 | <0.08 | NA | NA | <0.44 | NA | <0.46 | NA |
| | 5/12/03 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| | 5/3/04 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| | 5/12/05 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| | 8/11/05 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| | 11/8/05 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| | 2/8/06 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| | 6/5/06 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| | 8/8/06 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| | 11/15/06 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| | 5/24/07 | <0.32 | NA | <2.1 | <0.65 | <0.35 | NA | <0.32 | <0.42 | <0.62 | <0.62 | <0.35 | <0.57 | 15.9 | <0.35 | <0.24 | <0.35 | <0.26 | NA | NA | <0.45 | NA | <4.15 | NA |

Table A.1
Group A Closure – Groundwater Analytical Tables - Volatile Organic Compounds
Monitoring Wells and Recovery Wells
Trent Tube Plant No. 1
2188 Church Street, East Troy, Wisconsin

| Well Name | Sample Date | Acetone | Benzene | Bromochloromethane | Bromodichloromethane | Bromoform | n-Butylbenzene | sec-Butylbenzene | tert-Butylbenzene | Carbon disulfide | Carbon tetrachloride | Chloroethane | Chloroform | 2-Chlorotoluene | 4-Chlorotoluene | 1,1-Dichloroethane | 1,2-Dichloroethane | 1,1-Dichloroethene | cis-1,2-Dichloroethene | trans-1,2-Dichloroethene | Ethylbenzene | Hexachlorobutadiene | Isopropylbenzene |
|-------------------|-------------|---------|---------|--------------------|----------------------|-----------|----------------|------------------|-------------------|------------------|----------------------|--------------|------------|-----------------|-----------------|--------------------|--------------------|--------------------|------------------------|--------------------------|--------------|---------------------|------------------|
| MW-17 Area | | | | | | | | | | | | | | | | | | | | | | | |
| PAL | | 1800 | 0.5 | NE | 0.06 | 0.4 | NE | NE | NE | 200 | 0.5 | 80 | 0.6 | NE | NE | 85 | 0.5 | 0.7 | 7 | 20 | 140 | NE | NE |
| ES | | 9000 | 5 | NE | 0.6 | 4.4 | NE | NE | NE | 1000 | 5 | 400 | 6 | NE | NE | 850 | 5 | 7 | 70 | 100 | 700 | NE | NE |
| MW-37 & | 8/15/12 | 5.84 | <0.2 | <0.33 | <0.11 | <0.29 | <0.24 | <0.17 | <0.17 | <0.22 | <0.18 | <0.36 | <0.23 | <0.18 | <0.17 | 1.28 | <0.2 | 0.622 | 25 | 9.19 | <0.19 | <0.21 | <0.17 |
| MW-37R | 11/14/12 | <2.66 | <0.2 | <0.33 | <0.11 | <0.29 | <0.24 | <0.17 | <0.17 | <0.22 | <0.18 | <0.36 | <0.23 | <0.18 | <0.17 | 1.11 | <0.2 | 0.727 | 26.1 | 10.2 | <0.19 | <0.21 | <0.17 |
| | 3/8/13 | 3.67 | <0.2 | <0.33 | <0.11 | <0.29 | <0.24 | <0.17 | <0.17 | <0.22 | <0.18 | <0.36 | <0.23 | <0.18 | <0.17 | 0.666 | <0.2 | 0.625 | 14.4 | 5.84 | <0.19 | <0.21 | <0.17 |
| | 7/20/13 | <2.66 | <0.2 | <0.15 | <0.17 | <0.29 | <0.24 | <0.17 | <0.17 | <0.22 | <0.18 | <0.36 | <0.23 | <0.18 | <0.17 | 0.682 | <0.2 | <0.25 | 3.84 | 0.687 | <0.19 | <0.38 | <0.33 |
| | 3/26/14 | 21.3 | <0.2 | <0.15 | <0.17 | <0.29 | <0.24 | <0.17 | <0.17 | <0.22 | <0.18 | <0.36 | <0.23 | <0.18 | <0.17 | 2.05 | <0.2 | <0.25 | 10.6 | <0.23 | <0.19 | <0.38 | <0.33 |
| | 6/6/14 | <2.66 | <0.2 | <0.15 | <0.17 | <0.29 | <0.24 | <0.17 | <0.17 | <0.22 | <0.18 | <0.36 | <0.23 | <0.18 | <0.17 | <0.24 | <0.2 | <0.25 | 3.67 | 1.9 | <0.19 | <0.38 | <0.33 |
| | 9/10/14 | <2.66 | <0.2 | <0.15 | <0.17 | <0.29 | <0.24 | <0.17 | <0.17 | <0.22 | <0.18 | <0.36 | 1.41 | <0.18 | <0.17 | <0.24 | <0.2 | <0.25 | 1.69 | 0.655 | <0.19 | <0.38 | <0.33 |
| | 12/9/14 | <2.66 | <0.2 | <0.15 | <0.17 | <0.29 | <0.24 | <0.17 | <0.17 | <0.22 | <0.18 | <0.36 | 0.257 | <0.18 | <0.17 | 0.567 | <0.2 | 0.33 | 13.9 | 8.72 | <0.19 | <0.38 | <0.33 |
| | 3/18/15 | <1.79 | <0.11 | <0.12 | <0.14 | <0.22 | <0.2 | <0.12 | <0.15 | <0.24 | <0.19 | <0.28 | <0.31 | <0.13 | <0.13 | 0.228 | <0.18 | <0.15 | 3.84 | 1.96 | <0.21 | <0.2 | <0.19 |
| | 5/20/15 | <2.66 | <0.2 | <0.15 | <0.17 | <0.29 | <0.24 | <0.17 | <0.17 | <0.22 | <0.18 | <0.36 | <0.23 | <0.18 | <0.17 | <0.24 | <0.2 | <0.25 | 3.56 | 1.84 | <0.19 | <0.38 | <0.33 |
| | 6/21/16 | NA | <0.5 | <0.34 | <0.5 | <0.5 | <0.5 | <2.0 | <0.18 | NA | <0.5 | <0.37 | <2.5 | <0.5 | <0.21 | <0.24 | <0.17 | <0.41 | 1.7 | 0.87 | <0.5 | <2.1 | <0.14 |
| | 11/9/16 | NA | <0.5 | <0.34 | <0.5 | <0.5 | <0.5 | <2.2 | <0.18 | NA | <0.5 | <0.37 | <2.5 | <0.5 | <0.21 | <0.24 | <0.17 | <0.41 | 0.53 J | <0.26 | <0.5 | <2.1 | <0.14 |

| Well Name | Sample Date | p-Isopropyltoluene | Methyl chloride | Methylene chloride | Naphthalene | n-Propylbenzene | Styrene | Tetrachloroethene | Toluene | 1,2,3-Trichlorobenzene | 1,2,4-Trichlorobenzene | 1,1,1-Trichloroethane | 1,1,2-Trichloroethane | Trichloroethene | 1,2,4-Trimethylbenzene | 1,3,5-Trimethylbenzene | Trimethylbenzenes (total) | Vinyl chloride | M+p-Xylene | o-Xylene | Xylenes (total) | Methyl butyl ketone | Methyl isobutyl ketone | Methyl ethyl ketone |
|-------------------|-------------|--------------------|-----------------|--------------------|-------------|-----------------|---------|-------------------|---------|------------------------|------------------------|-----------------------|-----------------------|-----------------|------------------------|------------------------|---------------------------|----------------|------------|----------|-----------------|---------------------|------------------------|---------------------|
| MW-17 Area | | | | | | | | | | | | | | | | | | | | | | | | |
| PAL | | NE | 3 | 0.5 | 10 | NE | 10 | 0.5 | 160 | NE | 14 | 40 | 0.5 | 0.5 | NE | NE | 96 | 0.02 | NE | NE | 0.4 | NE | 50 | 0.8 |
| ES | | NE | 30 | 5 | 40 | NE | 100 | 5 | 800 | NE | 70 | 200 | 5 | 5 | NE | NE | 480 | 0.2 | NE | NE | 2 | NE | 500 | 4 |
| MW-37 & | 8/15/12 | <0.17 | NA | <0.16 | <0.21 | <0.17 | <0.2 | <0.25 | <0.17 | <0.23 | <0.15 | 1.03 | <0.19 | 178 | <0.17 | <0.15 | NA | 1.71 | NA | NA | <0.18 | <1.28 | <0.81 | <2.64 |
| MW-37R | 11/14/12 | <0.17 | NA | <0.16 | <0.21 | <0.17 | <0.2 | <0.25 | <0.17 | <0.23 | <0.15 | 0.776 | <0.19 | 175 | <0.17 | <0.15 | NA | 0.802 | NA | NA | <0.18 | <1.28 | <0.81 | <2.64 |
| | 3/8/13 | <0.17 | NA | <0.16 | <0.21 | <0.17 | <0.2 | <0.25 | <0.17 | <0.23 | <0.15 | 0.852 | <0.19 | 135 | <0.17 | <0.15 | NA | 1.19 | NA | NA | <0.18 | <1.28 | <0.81 | <2.64 |
| | 7/20/13 | <0.17 | NA | <0.22 | <0.21 | <0.17 | <0.28 | 1.31 | 0.246 | <0.23 | <0.2 | <0.19 | <0.19 | 91.9 | <0.17 | <0.17 | NA | <0.18 | NA | NA | <0.58 | <1.28 | <0.81 | <2.64 |
| | 3/26/14 | <0.17 | NA | <0.22 | <0.21 | <0.17 | <0.28 | 0.66 | 0.198 J | <0.23 | <0.2 | 1.36 | <0.19 | 63.2 | <0.17 | <0.17 | NA | 1.71 | NA | NA | <0.58 | <1.28 | <0.81 | <2.64 |
| | 6/6/14 | <0.17 | NA | <0.22 | <0.21 | <0.17 | <0.28 | 0.814 J | <0.17 | <0.23 | <0.2 | 0.938 J | <0.19 | 82.6 | <0.17 | <0.17 | NA | <0.18 | NA | NA | <0.38 | <1.28 | <0.81 | <2.64 |
| | 9/10/14 | <0.17 | NA | <0.22 | <0.21 | <0.17 | <0.28 | 1.03 | <0.17 | <0.23 | <0.2 | 0.801 | <0.19 | 54 | <0.17 | <0.17 | NA | <0.18 | NA | NA | <0.38 | <1.28 | <0.81 | <2.64 |
| | 12/9/14 | <0.17 | NA | <0.22 | <0.21 | <0.17 | <0.28 | 0.620 | <0.17 | <0.23 | <0.2 | 0.557 | <0.19 | 75.5 | <0.17 | <0.17 | NA | 0.268 | NA | NA | <0.38 | <1.28 | <0.81 | <2.64 |
| | 3/18/15 | <0.14 | NA | <0.17 | <0.37 | <0.1 | <0.1 | 0.690 | <0.15 | <0.16 | <0.16 | 0.421 | <0.12 | 39.8 | <0.2 | <0.2 | NA | 0.18 | NA | NA | <0.13 | <0.2 | <0.22 | <0.37 |
| | 5/20/15 | <0.17 | NA | <0.22 | <0.21 | <0.17 | <0.28 | 0.507 | <0.17 | <0.23 | <0.2 | <0.19 | <0.19 | 47.1 | <0.17 | <0.17 | NA | <0.18 | NA | NA | <0.38 | <1.28 | <0.81 | <2.64 |
| | 6/21/16 | <0.5 | NA | <0.23 | <2.5 | <0.5 | <0.5 | <0.5 | <0.5 | <2.1 | <2.2 | <0.5 | <0.2 | 13.7 | <0.5 | <0.5 | NA | <0.18 | NA | NA | <1 | NA | NA | NA |
| | 11/9/16 | <0.5 | NA | <0.23 | <2.5 | <0.5 | <0.5 | <0.5 | <0.5 | <2.1 | <2.2 | <0.5 | <0.20 | 14 | <0.5 | <0.5 | NA | <0.18 | <1 | <0.5 | <1 | NA | NA | NA |

Table A.1
Group A Closure – Groundwater Analytical Tables - Volatile Organic Compounds
Monitoring Wells and Recovery Wells
Trent Tube Plant No. 1
2188 Church Street, East Troy, Wisconsin

| Well Name | Sample Date | Acetone | Benzene | Bromochloromethane | Bromodichloromethane | Bromoform | n-Butylbenzene | sec-Butylbenzene | tert-Butylbenzene | Carbon disulfide | Carbon tetrachloride | Chloroethane | Chloroform | 2-Chlorotoluene | 4-Chlorotoluene | 1,1-Dichloroethane | 1,2-Dichloroethane | 1,1-Dichloroethene | cis-1,2-Dichloroethene | trans-1,2-Dichloroethene | Ethylbenzene | Hexachlorobutadiene | Isopropylbenzene |
|-------------------|-------------|---------|---------|--------------------|----------------------|-----------|----------------|------------------|-------------------|------------------|----------------------|--------------|------------|-----------------|-----------------|--------------------|--------------------|--------------------|------------------------|--------------------------|--------------|---------------------|------------------|
| GP-18 Area | | | | | | | | | | | | | | | | | | | | | | | |
| | PAL | 1800 | 0.5 | NE | 0.06 | 0.4 | NE | NE | NE | 200 | 0.5 | 80 | 0.6 | NE | NE | 85 | 0.5 | 0.7 | 7 | 20 | 140 | NE | NE |
| | ES | 9000 | 5 | NE | 0.6 | 4.4 | NE | NE | NE | 1000 | 5 | 400 | 6 | NE | NE | 850 | 5 | 7 | 70 | 100 | 700 | NE | NE |
| MW-21 | 4/26/99 | <0.5 | <0.5 | <1 | NA | <1 | <1 | <1 | <1 | NA | NA | <1 | <0.5 | <1 | <1 | <1 | <0.5 | <0.5 | <0.5 | <0.5 | <1 | <1 | <1 |
| | 7/27/99 | <0.5 | <0.5 | <1 | NA | <1 | <1 | <1 | <1 | NA | NA | <1 | <0.5 | <1 | <1 | <1 | <0.5 | <0.5 | <0.5 | <0.5 | <1 | <1 | <1 |
| | 11/1/99 | <0.5 | <0.5 | <1 | NA | <1 | <1 | <1 | <1 | NA | NA | <1 | <0.5 | <1 | <1 | <1 | <0.5 | <0.5 | <0.5 | <0.5 | <1 | <1 | <1 |
| | 2/4/00 | <0.5 | <0.5 | <1 | NA | <1 | <1 | <1 | <1 | NA | <0.5 | <1 | <0.5 | <1 | <1 | <1 | <0.5 | <0.5 | <0.5 | <0.5 | <1 | <1 | <1 |
| | 5/8/00 | <0.5 | <0.5 | <1 | NA | <1 | <1 | <1 | <1 | NA | <0.5 | <1 | <0.5 | <1 | <1 | <1 | <0.5 | <0.5 | <0.5 | <0.5 | <1 | <1 | <1 |
| | 8/16/00 | <0.5 | <0.5 | <1 | NA | <1 | <1 | <1 | <1 | NA | <0.5 | <1 | <0.5 | <1 | <1 | <1 | <0.5 | <0.5 | <0.5 | <0.5 | <1 | <1 | <1 |
| | 11/6/00 | <10 | <0.5 | <1 | NA | <1 | <1 | <1 | <1 | NA | <0.5 | <1 | <0.5 | <1 | <1 | <1 | <0.5 | <0.5 | <0.5 | <0.5 | <1 | <1 | <1 |
| | 5/4/01 | <25 | <0.5 | <1 | NA | <1 | <1 | <1 | <1 | NA | <0.5 | <1 | <0.5 | <1 | <1 | <1 | <0.5 | <0.5 | <0.5 | <0.5 | <1 | <1 | <1 |
| | 10/8/01 | <25 | <0.5 | <1 | NA | <1 | <1 | <1 | <1 | NA | <0.5 | <1 | <0.5 | <1 | <1 | <1 | <0.5 | <0.5 | <0.5 | <0.5 | <1 | <1 | <1 |
| | 5/2/02 | <1.54 | <0.31 | <0.16 | NA | <0.12 | <0.12 | <0.08 | <0.06 | NA | <0.5 | <0.06 | <0.06 | <0.06 | <0.06 | <0.05 | <0.21 | <0.06 | <0.06 | <0.1 | <0.22 | <0.26 | <0.06 |
| | 11/4/02 | <1.54 | <0.31 | <0.16 | NA | <0.12 | <0.12 | <0.08 | <0.06 | NA | <0.5 | <0.06 | <0.06 | <0.06 | <0.06 | <0.05 | <0.21 | <0.06 | <0.06 | <0.1 | <0.22 | <0.26 | <0.06 |
| | 5/13/03 | <1.54 | <0.31 | <0.16 | NA | <0.12 | <0.12 | <0.08 | <0.06 | NA | <0.5 | <0.06 | <0.06 | <0.06 | <0.06 | <0.05 | <0.21 | <0.06 | <0.06 | <0.1 | <0.22 | <0.26 | <0.06 |
| | 5/3/04 | <1.5 | <0.05 | <0.09 | NA | <0.29 | <0.08 | <0.13 | <0.07 | NA | <0.5 | <0.16 | <0.1 | <0.15 | <0.11 | <0.07 | <0.21 | <0.12 | <0.07 | <0.08 | <0.12 | <0.09 | <0.06 |
| | 5/12/05 | <2.17 | <0.25 | <0.39 | NA | <0.29 | <0.15 | <0.43 | <0.35 | NA | <0.5 | <0.24 | <0.38 | <0.19 | <0.2 | <0.25 | <0.39 | <0.29 | <0.32 | <0.23 | <0.19 | <0.4 | <0.43 |
| | 8/11/05 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| | 11/8/05 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| | 2/8/06 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| | 5/31/06 | <1.28 | <0.2 | <0.31 | NA | <0.29 | <0.2 | <0.2 | <0.2 | NA | 2.59 | <0.25 | <0.2 | <0.19 | <0.2 | <0.2 | <0.39 | <0.2 | <0.2 | <0.2 | <0.2 | <0.4 | <0.2 |
| | 8/8/06 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| | 11/15/06 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| | 5/24/07 | <7.41 | <0.33 | <0.7 | NA | <0.54 | <0.78 | <0.26 | <0.4 | NA | <0.41 | <0.36 | <0.51 | <0.21 | <0.41 | <0.6 | <0.46 | <0.27 | <0.54 | <0.2 | <0.42 | <0.66 | <0.41 |
| | 7/19/13 | <2.66 | <0.2 | <0.15 | <0.17 | <0.29 | <0.24 | <0.17 | <0.17 | <0.22 | <0.18 | <0.36 | <0.23 | <0.18 | <0.17 | <0.24 | <0.2 | <0.25 | <0.21 | <0.23 | <0.19 | <0.38 | <0.33 |
| | 6/6/14 | <2.66 | <0.2 | <0.15 | <0.17 | <0.29 | <0.24 | <0.17 | <0.17 | <0.22 | <0.18 | <0.36 | <0.23 | <0.18 | <0.17 | <0.24 | <0.2 | <0.25 | <0.21 | <0.23 | <0.19 | <0.38 | <0.33 |
| | 5/20/15 | <2.66 | <0.2 | <0.15 | <0.17 | <0.29 | <0.24 | <0.17 | <0.17 | <0.22 | <0.18 | <0.36 | <0.23 | <0.18 | <0.17 | <0.24 | <0.2 | <0.25 | <0.21 | <0.23 | <0.19 | <0.38 | <0.33 |
| | 6/20/16 | NA | <0.5 | <0.34 | <0.5 | <0.5 | <0.5 | <2.2 | <0.18 | NA | <0.5 | <0.37 | <2.5 | <0.5 | <0.21 | <0.24 | <0.17 | <0.41 | <0.26 | <0.26 | <0.5 | <2.1 | <0.14 |

Table A.1
Group A Closure – Groundwater Analytical Tables - Volatile Organic Compounds
Monitoring Wells and Recovery Wells
Trent Tube Plant No. 1
2188 Church Street, East Troy, Wisconsin

| Well Name | Sample Date | p-Isopropyltoluene | Methyl chloride | Methylene chloride | Naphthalene | n-Propylbenzene | Styrene | Tetrachloroethene | Toluene | 1,2,3-Trichlorobenzene | 1,2,4-Trichlorobenzene | 1,1,1-Trichloroethane | 1,1,2-Trichloroethane | Trichloroethene | 1,2,4-Trimethylbenzene | 1,3,5-Trimethylbenzene | Trimethylbenzenes (total) | Vinyl chloride | m+p-Xylene | o-Xylene | Xylenes (total) | Methyl butyl ketone | Methyl isobutyl ketone | Methyl ethyl ketone | |
|-------------------|-------------|--------------------|-----------------|--------------------|-------------|-----------------|------------|-------------------|------------|------------------------|------------------------|-----------------------|-----------------------|-----------------|------------------------|------------------------|---------------------------|----------------|------------|-----------|-----------------|---------------------|------------------------|---------------------|--|
| GP-18 Area | | | | | | | | | | | | | | | | | | | | | | | | | |
| | PAL | <i>NE</i> | 3 | <i>0.5</i> | <i>10</i> | <i>NE</i> | <i>10</i> | <i>0.5</i> | <i>160</i> | <i>NE</i> | <i>14</i> | <i>40</i> | <i>0.5</i> | <i>0.5</i> | <i>NE</i> | <i>NE</i> | <i>96</i> | <i>0.02</i> | <i>NE</i> | <i>NE</i> | <i>0.4</i> | <i>NE</i> | <i>50</i> | <i>0.8</i> | |
| | ES | NE | 30 | 5 | 40 | NE | 100 | 5 | 800 | NE | 70 | 200 | 5 | 5 | NE | NE | 480 | 0.2 | NE | NE | 2 | NE | 500 | 4 | |
| MW-21 | 4/26/99 | <1 | NA | <0.5 | <1 | <1 | NA | <0.5 | <1 | <1 | <1 | 42.8 | <0.5 | <0.5 | <1 | <1 | <1 | <0.2 | NA | NA | <1 | NA | NA | NA | |
| | 7/27/99 | <1 | NA | <0.5 | <1 | <1 | NA | <0.5 | <1 | <1 | <1 | 14.9 | <0.5 | <0.5 | <1 | <1 | <1 | <0.2 | NA | NA | <1 | NA | NA | NA | |
| | 11/1/99 | <1 | NA | <0.5 | <1 | <1 | NA | 2 | <1 | <1 | <1 | <0.5 | <0.5 | <0.5 | <1 | <1 | <1 | <0.2 | NA | NA | <1 | NA | NA | NA | |
| | 2/4/00 | <1 | NA | <0.5 | <2.5 | <1 | NA | 1 | <1 | <1 | <1 | 10.3 | <0.5 | <0.5 | <1 | <1 | <1 | <0.2 | NA | NA | <1 | NA | <5 | NA | |
| | 5/8/00 | <1 | NA | <0.5 | <2.5 | <1 | NA | 1.2 | <1 | <1 | <1 | 4.3 | <0.5 | 1.2 | <1 | <1 | <1 | <0.2 | NA | NA | <1 | NA | <5 | NA | |
| | 8/16/00 | <1 | NA | <0.5 | <2.5 | <1 | NA | 1 | <1 | <1 | <1 | 8.6 | <0.5 | <0.5 | <1 | <1 | <1 | <0.2 | NA | NA | <1 | NA | <5 | NA | |
| | 11/6/00 | <1 | NA | <0.5 | <2.5 | <1 | NA | <0.5 | <1 | <1 | <1 | 3.4 | <0.5 | <0.5 | <1 | <1 | <1 | <0.2 | NA | NA | <1 | NA | <10 | NA | |
| | 5/4/01 | <1 | NA | <0.5 | <2.5 | <1 | NA | <0.5 | <1 | <1 | <1 | 20.2 | <0.5 | <0.5 | <1 | <1 | <1 | <0.2 | NA | NA | <1 | NA | <10 | NA | |
| | 10/8/01 | <1 | NA | <0.5 | <2.5 | <1 | NA | 1 | <1 | <1 | <1 | 5.7 | <0.5 | <0.5 | <1 | <1 | <1 | <0.2 | NA | NA | <1 | NA | <10 | NA | |
| | 5/2/02 | <0.08 | NA | 0.6 | <0.17 | <0.05 | NA | 0.77 | <0.05 | <0.11 | <0.05 | 19.8 | <0.09 | 0.49 J | <0.05 | <0.06 | <0.05 | <0.08 | NA | NA | <0.44 | NA | <0.46 | NA | |
| | 11/4/02 | <0.08 | NA | <0.1 | <0.17 | <0.05 | NA | 1.38 | <0.05 | <0.11 | <0.05 | 3.35 | <0.09 | 0.55 | <0.05 | <0.06 | <0.05 | <0.08 | NA | NA | <0.44 | NA | <0.46 | NA | |
| | 5/13/03 | <0.08 | NA | <0.1 | <0.17 | <0.05 | NA | <0.09 | <0.05 | <0.11 | <0.05 | 14.1 | <0.09 | <0.12 | <0.05 | <0.06 | <0.05 | <0.08 | NA | NA | <0.44 | NA | <0.46 | NA | |
| | 5/3/04 | <0.08 | NA | <0.09 | <0.38 | <0.08 | NA | 0.8 | <0.11 | <0.09 | <0.13 | 20 | <0.12 | 0.6 | <0.18 | <0.13 | <0.13 | <0.13 | NA | NA | <0.34 | NA | <0.38 | NA | |
| | 5/12/05 | <0.17 | NA | <0.16 | <1.1 | <0.12 | NA | 0.9 | <0.17 | <0.29 | <0.26 | 5.2 | <0.22 | 0.4 | <0.25 | <0.35 | NA | <0.19 | NA | NA | <0.33 | NA | NA | NA | |
| | 8/11/05 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | |
| | 11/8/05 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | |
| | 2/8/06 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | |
| | 5/31/06 | <0.2 | NA | <0.44 | <0.5 | <0.2 | NA | <0.25 | <0.2 | <0.29 | <0.32 | 12.9 | <0.2 | <0.2 | <0.2 | <0.22 | <0.2 | <0.2 | NA | NA | <0.35 | NA | <1.12 | NA | |
| | 8/8/06 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | |
| | 11/15/06 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | |
| | 5/24/07 | <0.32 | NA | <2.1 | <0.65 | <0.35 | NA | <0.32 | <0.42 | <0.62 | <0.62 | 10.7 | <0.57 | <0.51 | <0.35 | <0.24 | <0.35 | <0.26 | NA | NA | <0.45 | NA | <4.15 | NA | |
| | 7/19/13 | <0.17 | NA | <0.22 | <0.21 | <0.17 | <0.28 | 0.295 | 0.174 | <0.23 | <0.2 | 4.71 | <0.19 | 0.343 | <0.17 | <0.17 | NA | <0.18 | NA | NA | <0.58 | <1.28 | <0.81 | <2.64 | |
| | 6/6/14 | <0.17 | NA | <0.22 | <0.21 | <0.17 | <0.28 | 0.627 J | <0.17 | <0.23 | <0.2 | 8.66 | <0.19 | 12 | <0.17 | <0.17 | NA | <0.18 | NA | NA | <0.38 | <1.28 | <0.81 | <2.64 | |
| | 5/20/15 | <0.17 | NA | <0.22 | <0.21 | <0.17 | <0.28 | 0.930 | <0.17 | <0.23 | <0.2 | 3.10 | <0.19 | 0.253 | <0.17 | <0.17 | NA | <0.18 | NA | NA | <0.38 | <1.28 | <0.81 | <2.64 | |
| | 6/20/16 | <0.5 | NA | <0.23 | <2.5 | <0.5 | <0.5 | <0.5 | <0.5 | <2.1 | <2.2 | 6.9 | <0.2 | <0.33 | <0.5 | <0.5 | NA | <0.18 | NA | NA | <1 | NA | NA | NA | |

**Table A.1
Group A Closure – Groundwater Analytical Tables - Volatile Organic Compounds
Monitoring Wells and Recovery Wells
Trent Tube Plant No. 1
2188 Church Street, East Troy, Wisconsin**

| Well Name | Sample Date | Acetone | Benzene | Bromochloromethane | Bromodichloromethane | Bromoform | n-Butylbenzene | sec-Butylbenzene | tert-Butylbenzene | Carbon disulfide | Carbon tetrachloride | Chloroethane | Chloroform | 2-Chlorotoluene | 4-Chlorotoluene | 1,1-Dichloroethane | 1,2-Dichloroethane | 1,1-Dichloroethene | cis-1,2-Dichloroethene | trans-1,2-Dichloroethene | Ethylbenzene | Hexachlorobutadiene | Isopropylbenzene |
|-------------------|-------------|---------|---------|--------------------|----------------------|-----------|----------------|------------------|-------------------|------------------|----------------------|--------------|------------|-----------------|-----------------|--------------------|--------------------|--------------------|------------------------|--------------------------|--------------|---------------------|------------------|
| GP-18 Area | | | | | | | | | | | | | | | | | | | | | | | |
| | PAL | 1800 | 0.5 | NE | 0.06 | 0.4 | NE | NE | NE | 200 | 0.5 | 80 | 0.6 | NE | NE | 85 | 0.5 | 0.7 | 7 | 20 | 140 | NE | NE |
| | ES | 9000 | 5 | NE | 0.6 | 4.4 | NE | NE | NE | 1000 | 5 | 400 | 6 | NE | NE | 850 | 5 | 7 | 70 | 100 | 700 | NE | NE |
| MW-22 | 4/26/99 | <0.5 | <0.5 | <1 | NA | <1 | <1 | <1 | <1 | NA | NA | <1 | <0.5 | <1 | <1 | 1.2 | <0.5 | <0.5 | <0.5 | <0.5 | <1 | <1 | <1 |
| | 7/27/99 | <0.5 | <0.5 | <1 | NA | <1 | <1 | <1 | <1 | NA | NA | <1 | <0.5 | <1 | <1 | <1 | <0.5 | <0.5 | <0.5 | <0.5 | <1 | <1 | <1 |
| | 11/1/99 | <0.5 | <0.5 | <1 | NA | <1 | <1 | <1 | <1 | NA | NA | <1 | <0.5 | <1 | <1 | <1 | <0.5 | <0.5 | <0.5 | <0.5 | <1 | <1 | <1 |
| | 2/4/00 | <0.5 | <0.5 | <1 | NA | <1 | <1 | <1 | <1 | NA | <0.5 | <1 | <0.5 | <1 | <1 | <1 | <0.5 | <0.5 | <0.5 | <0.5 | <1 | <1 | <1 |
| | 5/8/00 | <0.5 | <0.5 | <1 | NA | <1 | <1 | <1 | <1 | NA | <0.5 | <1 | <0.5 | <1 | <1 | <1 | <0.5 | <0.5 | <0.5 | <0.5 | <1 | <1 | <1 |
| | 8/16/00 | <5 | <0.5 | <1 | NA | <1 | <1 | <1 | <1 | NA | <0.5 | <1 | <0.5 | <1 | <1 | <1 | <0.5 | <0.5 | <0.5 | <0.5 | <1 | <1 | <1 |
| | 11/6/00 | <10 | <0.5 | <1 | NA | <1 | <1 | <1 | <1 | NA | <0.5 | <1 | <0.5 | <1 | <1 | <1 | <0.5 | <0.5 | <0.5 | <0.5 | <1 | <1 | <1 |
| | 5/4/01 | <25 | <0.5 | <1 | NA | <1 | <1 | <1 | <1 | NA | <0.5 | <1 | <0.5 | <1 | <1 | <1 | <0.5 | <0.5 | <0.5 | <0.5 | <1 | <1 | <1 |
| | 10/8/01 | <25 | <0.5 | <1 | NA | <1 | <1 | <1 | <1 | NA | <0.5 | <1 | <0.5 | <1 | <1 | <1 | <0.5 | <0.5 | <0.5 | <0.5 | <1 | <1 | <1 |
| | 5/2/02 | <1.54 | <0.31 | <0.16 | NA | <0.12 | <0.12 | <0.08 | <0.06 | NA | <0.5 | <0.06 | <0.06 | <0.06 | <0.06 | 0.4 J | <0.21 | <0.06 | <0.06 | <0.1 | <0.22 | <0.26 | <0.06 |
| | 11/4/02 | <1.54 | <0.31 | <0.16 | NA | <0.12 | <0.12 | <0.08 | <0.06 | NA | <0.5 | <0.06 | <0.06 | <0.06 | <0.06 | <0.05 | <0.21 | <0.06 | <0.06 | <0.1 | <0.22 | <0.26 | <0.06 |
| | 5/13/03 | <1.54 | <0.31 | <0.16 | NA | <0.12 | <0.12 | <0.08 | <0.06 | NA | <0.5 | <0.06 | <0.06 | <0.06 | <0.06 | <0.05 | <0.21 | <0.06 | <0.06 | <0.1 | <0.22 | <0.26 | <0.06 |
| | 5/3/04 | <1.5 | <0.05 | <0.09 | NA | <0.29 | <0.08 | <0.13 | <0.07 | NA | <0.5 | <0.16 | <0.1 | <0.15 | <0.11 | <0.07 | <0.21 | <0.12 | <0.07 | <0.08 | <0.12 | <0.09 | <0.06 |
| | 5/12/05 | <2.17 | <0.25 | <0.39 | NA | <0.29 | <0.15 | <0.43 | <0.35 | NA | <0.5 | <0.24 | <0.38 | <0.19 | <0.2 | <0.25 | <0.39 | <0.29 | <0.32 | <0.23 | <0.19 | <0.4 | <0.43 |
| | 8/11/05 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| | 11/8/05 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| | 2/8/06 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| | 5/31/06 | <1.28 | <0.2 | <0.31 | NA | <0.29 | <0.2 | <0.2 | <0.2 | NA | <0.22 | <0.25 | <0.2 | <0.19 | <0.2 | <0.2 | <0.39 | <0.2 | <0.2 | <0.2 | <0.2 | <0.4 | <0.2 |
| | 8/8/06 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| | 11/15/06 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| | 5/24/07 | <7.41 | <0.33 | <0.7 | NA | <0.54 | <0.78 | <0.26 | <0.4 | NA | <0.41 | <0.35 | <0.51 | <0.21 | <0.41 | <0.6 | <0.46 | <0.27 | <0.54 | <0.2 | <0.42 | <0.66 | <0.41 |

Table A.1
Group A Closure – Groundwater Analytical Tables - Volatile Organic Compounds
Monitoring Wells and Recovery Wells
Trent Tube Plant No. 1
2188 Church Street, East Troy, Wisconsin

| Well Name | Sample Date | p-Isopropyltoluene | Methyl chloride | Methylene chloride | Naphthalene | n-Propylbenzene | Styrene | Tetrachloroethene | Toluene | 1,2,3-Trichlorobenzene | 1,2,4-Trichlorobenzene | 1,1,1-Trichloroethane | 1,1,2-Trichloroethane | Trichloroethene | 1,2,4-Trimethylbenzene | 1,3,5-Trimethylbenzene | Trimethylbenzenes (total) | Vinyl chloride | m+p-Xylene | o-Xylene | Xylenes (total) | Methyl butyl ketone | Methyl isobutyl ketone | Methyl ethyl ketone |
|-------------------|-------------|--------------------|-----------------|--------------------|-------------|-----------------|------------|-------------------|------------|------------------------|------------------------|-----------------------|-----------------------|-----------------|------------------------|------------------------|---------------------------|----------------|------------|-----------|-----------------|---------------------|------------------------|---------------------|
| GP-18 Area | | | | | | | | | | | | | | | | | | | | | | | | |
| | PAL | <i>NE</i> | 3 | <i>0.5</i> | <i>10</i> | <i>NE</i> | <i>10</i> | <i>0.5</i> | <i>160</i> | <i>NE</i> | <i>14</i> | <i>40</i> | <i>0.5</i> | <i>0.5</i> | <i>NE</i> | <i>NE</i> | <i>96</i> | <i>0.02</i> | <i>NE</i> | <i>NE</i> | <i>0.4</i> | <i>NE</i> | <i>50</i> | <i>0.8</i> |
| | ES | NE | 30 | 5 | 40 | NE | 100 | 5 | 800 | NE | 70 | 200 | 5 | 5 | NE | NE | 480 | 0.2 | NE | NE | 2 | NE | 500 | 4 |
| MW-22 | 4/26/99 | <1 | NA | <0.5 | <1 | <1 | NA | 1.2 | <1 | <1 | <1 | 7.8 | <0.5 | 4.8 | <1 | <1 | <1 | <0.2 | NA | NA | <1 | NA | NA | NA |
| | 7/27/99 | <1 | NA | <0.5 | <1 | <1 | NA | <0.5 | <1 | <1 | <1 | 3.7 | <0.5 | 1.9 | <1 | <1 | <1 | <0.2 | NA | NA | <1 | NA | NA | NA |
| | 11/1/99 | <1 | NA | <0.5 | <1 | <1 | NA | <0.5 | <1 | <1 | <1 | 6 | <0.5 | 1 | <1 | <1 | <1 | <0.2 | NA | NA | <1 | NA | NA | NA |
| | 2/4/00 | <1 | NA | <0.5 | <2.5 | <1 | NA | 1.1 | <1 | <1 | <1 | 1.8 | <0.5 | <0.5 | <1 | <1 | <1 | <0.2 | NA | NA | <1 | NA | <5 | NA |
| | 5/8/00 | <1 | NA | <0.5 | <2.5 | <1 | NA | <0.5 | <1 | <1 | <1 | 4.8 | <0.5 | 1.3 | <1 | <1 | <1 | <0.2 | NA | NA | <1 | NA | <5 | NA |
| | 8/16/00 | <1 | NA | <0.5 | <2.5 | <1 | NA | 1 | <1 | <1 | <1 | 6.2 | <0.5 | 2.3 | <1 | <1 | <1 | <0.2 | NA | NA | <1 | NA | <5 | NA |
| | 11/6/00 | <1 | NA | <0.5 | <2.5 | <1 | NA | <0.5 | <1 | <1 | <1 | 9.3 | <0.5 | 1.1 | <1 | <1 | <1 | <0.2 | NA | NA | <1 | NA | <10 | NA |
| | 5/4/01 | <1 | NA | <0.5 | <2.5 | <1 | NA | <0.5 | <1 | <1 | <1 | 3.3 | <0.5 | 8.1 | <1 | <1 | <1 | <0.2 | NA | NA | <1 | NA | <10 | NA |
| | 10/8/01 | <1 | NA | <0.5 | <2.5 | <1 | NA | <0.5 | <1 | <1 | <1 | 3.4 | <0.5 | <0.5 | <1 | <1 | <1 | <0.2 | NA | NA | <1 | NA | <10 | NA |
| | 5/2/02 | <0.08 | NA | 1.4 J | <0.17 | <0.05 | NA | 0.58 | <0.05 | <0.11 | <0.05 | 2.5 | <0.09 | 1.21 | <0.05 | <0.06 | <0.05 | <0.08 | NA | NA | <0.44 | NA | <0.46 | NA |
| | 11/4/02 | <0.08 | NA | <0.1 | <0.17 | <0.05 | NA | 0.76 | <0.05 | <0.11 | <0.05 | 7.97 | <0.09 | 1.12 | <0.05 | <0.06 | <0.05 | <0.08 | NA | NA | <0.44 | NA | <0.46 | NA |
| | 5/13/03 | <0.08 | NA | <0.1 | <0.17 | <0.05 | NA | <0.09 | <0.05 | <0.11 | <0.05 | 7 | <0.09 | <0.12 | <0.05 | <0.06 | <0.05 | <0.08 | NA | NA | <0.44 | NA | <0.46 | NA |
| | 5/3/04 | <0.08 | NA | <0.09 | <0.38 | <0.08 | NA | 0.5 | <0.11 | <0.09 | <0.13 | 2.5 | <0.12 | <0.27 | <0.18 | <0.13 | <0.13 | <0.13 | NA | NA | <0.34 | NA | <0.38 | NA |
| | 5/12/05 | <0.17 | NA | <0.16 | <1.1 | <0.12 | NA | 0.4 J | <0.17 | <0.29 | <0.26 | 1.4 | <0.22 | 0.8 | <0.25 | <0.35 | NA | <0.19 | NA | NA | <0.33 | NA | NA | NA |
| | 8/11/05 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| | 11/8/05 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| | 2/8/06 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| | 5/31/06 | <0.2 | NA | <0.44 | <0.5 | <0.2 | NA | 1.06 | <0.2 | <0.29 | <0.32 | 2.08 | <0.2 | 0.83 | <0.2 | <0.22 | <0.2 | <0.2 | NA | NA | <0.35 | NA | <1.12 | NA |
| | 8/8/06 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| | 11/15/06 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| | 5/24/07 | <0.32 | NA | <2.1 | <0.65 | <0.35 | NA | 0.69 | <0.42 | <0.62 | <0.62 | 1.89 | <0.57 | 0.64 J | <0.35 | <0.24 | <0.35 | <0.26 | NA | NA | <0.45 | NA | <4.15 | NA |

**Table A.1
Group A Closure – Groundwater Analytical Tables - Volatile Organic Compounds
Monitoring Wells and Recovery Wells
Trent Tube Plant No. 1
2188 Church Street, East Troy, Wisconsin**

| Well Name | Sample Date | Acetone | Benzene | Bromochloromethane | Bromodichloromethane | Bromoform | n-Butylbenzene | sec-Butylbenzene | tert-Butylbenzene | Carbon disulfide | Carbon tetrachloride | Chloroethane | Chloroform | 2-Chlorotoluene | 4-Chlorotoluene | 1,1-Dichloroethane | 1,2-Dichloroethane | 1,1-Dichloroethene | cis-1,2-Dichloroethene | trans-1,2-Dichloroethene | Ethylbenzene | Hexachlorobutadiene | Isopropylbenzene |
|-------------------------|-------------|---------|---------|--------------------|----------------------|-----------|----------------|------------------|-------------------|------------------|----------------------|--------------|------------|-----------------|-----------------|--------------------|--------------------|--------------------|------------------------|--------------------------|--------------|---------------------|------------------|
| MW-16/Flume Area | | | | | | | | | | | | | | | | | | | | | | | |
| PAL | | 1800 | 0.5 | NE | 0.06 | 0.4 | NE | NE | NE | 200 | 0.5 | 80 | 0.6 | NE | NE | 85 | 0.5 | 0.7 | 7 | 20 | 140 | NE | NE |
| ES | | 9000 | 5 | NE | 0.6 | 4.4 | NE | NE | NE | 1000 | 5 | 400 | 6 | NE | NE | 850 | 5 | 7 | 70 | 100 | 700 | NE | NE |
| RW-8 | 7/20/13 | <2.66 | <0.2 | <0.15 | <0.17 | <0.29 | <0.240 | <0.17 | <0.17 | <0.22 | <0.18 | 6.04 | <0.23 | <0.18 | <0.17 | 11.9 | <0.2 | 13 | 68.4 | 0.486 | <0.19 | <0.38 | <0.33 |
| | 5/20/15 | <2.66 | <0.2 | <0.15 | <0.17 | <0.29 | <0.240 | <0.17 | <0.17 | <0.22 | <0.18 | 5.17 | <0.23 | <0.18 | <0.17 | 9.2 | <0.2 | 6.57 | 55.8 | 0.612 | <0.19 | <0.38 | <0.33 |
| | 6/20/16 | NA | <2.5 | <1.7 | <2.5 | <2.5 | <2.5 | <10.9 | <0.9 | NA | <2.5 | 9.6 | <12.5 | <2.5 | <1.1 | 10.5 | <0.84 | 13.7 | 361 | <1.3 | <2.5 | <10.5 | <0.72 |

| Well Name | Sample Date | p-Isopropyltoluene | Methyl chloride | Methylene chloride | Naphthalene | n-Propylbenzene | Styrene | Tetrachloroethene | Toluene | 1,2,3-Trichlorobenzene | 1,2,4-Trichlorobenzene | 1,1,1-Trichloroethane | 1,1,2-Trichloroethane | Trichloroethene | 1,2,4-Trimethylbenzene | 1,3,5-Trimethylbenzene | Trimethylbenzenes (total) | Vinyl chloride | m+p-Xylene | o-Xylene | Xylenes (total) | Methyl butyl ketone | Methyl isobutyl ketone | Methyl ethyl ketone |
|-------------------------|-------------|--------------------|-----------------|--------------------|-------------|-----------------|---------|-------------------|---------|------------------------|------------------------|-----------------------|-----------------------|-----------------|------------------------|------------------------|---------------------------|----------------|------------|----------|-----------------|---------------------|------------------------|---------------------|
| MW-16/Flume Area | | | | | | | | | | | | | | | | | | | | | | | | |
| PAL | | NE | 3 | 0.5 | 10 | NE | 10 | 0.5 | 160 | NE | 14 | 40 | 0.5 | 0.5 | NE | NE | 96 | 0.02 | NE | NE | 0.4 | NE | 50 | 0.8 |
| ES | | NE | 30 | 5 | 40 | NE | 100 | 5 | 800 | NE | 70 | 200 | 5 | 5 | NE | NE | 480 | 0.2 | NE | NE | 2 | NE | 500 | 4 |
| RW-8 | 7/20/13 | <0.17 | NA | <0.22 | <0.21 | <0.17 | <0.28 | 2.48 | <0.17 | <0.23 | <0.2 | 261 | <0.19 | 1390 | <0.17 | <0.17 | NA | 8.01 | NA | NA | <0.58 | <0.38 | <0.81 | <2.64 |
| | 5/20/15 | <0.17 | NA | <0.22 | <0.21 | <0.17 | <0.28 | 2.20 | <0.17 | <0.23 | <0.2 | 195 | <0.19 | 959 | <0.17 | <0.17 | NA | 1.77 | NA | NA | <0.58 | <0.38 | <0.81 | <2.64 |
| | 6/20/16 | <2.5 | NA | <1.2 | <12.5 | <2.5 | <2.5 | <2.5 | <2.5 | <10.7 | <11 | 178 | <0.99 | 498 | <2.5 | <2.5 | NA | 6.2 | NA | NA | <5 | NA | NA | NA |

Table A.1
Group A Closure – Groundwater Analytical Tables - Inorganic Compounds
Monitoring Wells and Recovery Wells
Trent Tube Plant No. 1
2188 Church Street, East Troy, Wisconsin

| Sample Name | Sample Date | Arsenic | Barium | Cadmium | Chromium, dissolved | Chromium, hexavalent | Lead | Mercury | Nickel | Selenium | Silver |
|-------------------------|-------------|---------|--------|---------|---------------------|----------------------|------|---------|--------|----------|--------|
| PAL | | 1 | 400 | 0.5 | 10 | NE | 1.5 | 0.2 | 20 | 10 | 10 |
| ES | | 10 | 2000 | 5 | 100 | NE | 15 | 2 | 100 | 50 | 50 |
| MW-17 Area | | | | | | | | | | | |
| MW-17R | 11/14/16 | 20.5 | 23.1 | <1.3 | <2.5 | <3.9 | <4.3 | <0.13 | 24.4 | 6.6 J | <3.2 |
| GP-18 Area | | | | | | | | | | | |
| MW-21 | 11/14/16 | <5.4 | 42.5 | <1.3 | 10.7 | 3.9 J | <4.3 | <0.13 | 40.6 | 10.2 J | <3.2 |
| MW-16/Flume Area | | | | | | | | | | | |
| RW-8 | 11/14/16 | <5.4 | 87.8 | <1.3 | <2.5 | <3.9 | <4.3 | <0.13 | 4.7 J | <5.6 | <3.2 |

Table A.2
Group A Closure – Soil Analytical Results Tables
Non-Industrial Direct Contact RCLs
Trent Tube Plant No. 1
2188 Church Street, East Troy, Wisconsin

Explanation

| | |
|--------------|---|
| TOC – | Total Organic Carbon |
| NA – | Not analyzed |
| NE - | Not established |
| NR - | Not reported |
| < - | Analyte not detected at quantitation limit – not detected |
| J - | Estimated |
| 123 - | Bold indicates exceedance of RCL |
| TOC - | Total organic carbon |
| HP - | Hydraulic probe |
| GP - | Geoprobe |
| MW - | Monitoring well |
| RW - | Recovery well |

All concentration values are in µg/kg unless noted.

Table A.2
Group A Closure – Soil Analytical Results Tables
Non-Industrial Direct Contact RCLs – Polynuclear Aromatic
Compounds Trent Tube Plant No. 1
2188 Church Street, East Troy, Wisconsin

| Sample Name | Sample Depth (ft) | Sample Date | Acenaphthene | Acenaphthylene | Anthracene | Benzo(a)anthracene | Benzo(a)pyrene | Benzo(b)fluoranthene | Benzo(ghi)perylene | Benzo(k)fluoranthene | Chrysene | Dibenzo(a,h)anthracene | Fluoranthene | Fluorene | Indeno(1,2,3-cd)pyrene | Naphthalene(8310/8270) | Phenanthrene | Pyrene | |
|-------------------------|-------------------|-------------|--------------|----------------|------------|--------------------|----------------|----------------------|--------------------|----------------------|----------|------------------------|--------------|----------|------------------------|------------------------|--------------|----------|---------|
| RCL | | | 3.44E+06 | NE | 1.72E+07 | 147 | 15 | 148 | NE | 1480 | 14800 | 15 | 2.29E+06 | 2.29E+06 | 148 | 5150 | NE | 1.72E+06 | |
| MW-17 Area | | | | | | | | | | | | | | | | | | | |
| GP-14 | 1-3 | 4/23/96 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| GP-19 | 1-3 | 4/24/96 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| MW-17 | 3-5 | 6/13/96 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| MW-18 | 3-5 | 6/14/96 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| HP-18 | 1-3 | 11/16/98 | <33 | <68 | <22 | <4.3 | <3 | <6 | <25 | <6 | <5 | <10 | <7 | <7 | <14 | <33 | <21 | <9 | |
| HP-19 | 1-3 | 11/16/98 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| HP-20 | 3-5 | 11/16/98 | <37 | <75 | <25 | <4.8 | <3 | <7 | <28 | <7 | <6 | <11 | <6 | <6 | <16 | <37 | <24 | <10 | |
| HP-21 | 2-4 | 11/16/98 | <36 | <77 | <25 | <4.9 | <3 | <7 | <29 | <7 | <6 | <11 | <6 | <6 | <16 | <36 | <24 | <10 | |
| HP-22 | 1-3 | 11/16/98 | <35 | <72 | <24 | <4.8 | <3 | <6 | <27 | <6 | <5 | <11 | <6 | <6 | <15 | <35 | <23 | <10 | |
| HP-23 | 2-4 | 11/17/98 | <36 | <73 | <24 | 9 | 13 | 20 | <27 | 7 | 6 | <11 | 34 | <6 | <15 | <36 | <23 | 16 | |
| HP-24 | 3-5 | 11/16/98 | <35 | <71 | <23 | <4.5 | <3 | <6 | <28 | <6 | <5 | <11 | <7 | <7 | <15 | <35 | <22 | <9 | |
| HP-25 | 1-3 | 11/16/98 | <38 | <78 | <26 | <5 | <3 | <7 | <29 | <7 | <6 | <12 | <6 | <6 | <16 | <36 | <24 | <10 | |
| HP-72 | 1-3 | 11/17/98 | <35 | <72 | <24 | <4.8 | <3 | <6 | <27 | <6 | <5 | <11 | <6 | <6 | <15 | <35 | <23 | <10 | |
| HP-73 | 1-3 | 11/17/98 | <38 | <74 | <24 | <4.7 | <3 | <7 | <27 | <7 | <5 | <11 | <6 | <6 | <15 | <36 | <23 | <10 | |
| GP-18 Area | | | | | | | | | | | | | | | | | | | |
| GP-18 | 3-5 | 4/24/96 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| HP-66 | 1-3 | 11/16/98 | <34 | <69 | <23 | <4.4 | <3 | <6 | <26 | <6 | <5 | <10 | <7 | <7 | <14 | <36 | <22 | <9 | |
| MW-21 | 4-5 | 3/24/99 | <181 | <181 | <181 | <181 | <181 | <181 | <181 | <181 | <181 | <181 | <181 | <181 | <181 | <181 | <181 | <181 | <181 |
| MW-22 | 6-8 | 3/24/99 | <190 | <190 | <190 | <190 | <190 | <190 | <190 | <190 | <190 | <190 | <190 | <190 | <190 | <190 | <190 | <190 | <190 |
| MW-16/Flume Area | | | | | | | | | | | | | | | | | | | |
| GP-8 | 1-3 | 4/23/96 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| GP-8 | 9-10 | 4/23/96 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| GP-12 | 1-3 | 4/23/96 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| GP-13 | 1-3 | 4/23/96 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| GP-17 | 1-3 | 4/23/96 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| GP-20 | 3-5 | 4/25/96 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| HP-26 | 3-5 | 11/17/98 | <39 | <80 | <26 | <5.1 | <4 | <7 | <30 | <7 | <6 | <12 | <6 | <6 | <17 | <39 | <25 | <11 | |
| HP-27 | 5-7 | 11/16/98 | <37 | <74 | <24 | <4.6 | <3 | <7 | <28 | <7 | <6 | <11 | <6 | <6 | <16 | <37 | <23 | <10 | |
| HP-28 | 1-3 | 11/17/98 | <36 | <73 | <24 | <4.7 | <3 | <7 | <27 | <7 | <5 | <11 | <6 | <6 | <15 | <36 | <23 | <10 | |
| HP-69 | 1-3 | 11/17/98 | <37 | <75 | <25 | <4.6 | <3 | <7 | <28 | <7 | <6 | <11 | <6 | <6 | <16 | <37 | <24 | <10 | |
| HP-75 | 5-7 | 11/18/98 | <38 | <76 | <25 | <4.9 | <3 | <7 | <28 | <7 | <6 | <11 | <8 | <6 | <16 | <38 | <24 | <10 | |
| HP-75 | 9-11 | 11/18/98 | <40 | <81 | <27 | 5.7 | 7 | 10 | <30 | <7 | <6 | <12 | 24 | <6 | <17 | <40 | <25 | <11 | |
| MW-16 | 3-5 | 6/13/96 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| RW-8 | 6-8 | 3/23/99 | <206 | <206 | <206 | <206 | <206 | <206 | <206 | <206 | <206 | <206 | <206 | <206 | <206 | <206 | <206 | <206 | <206 |
| GP Flume W | 0-4 | 6/23/16 | <0.0092 | <0.0082 | <0.0095 | <0.0064 | <0.0066 | <0.0092 | <0.007 | <0.0102 | <0.0085 | <0.0067 | 0.0114 J | <0.0092 | <0.007 | <0.0092 | <0.0092 | <0.0092 | <0.0092 |
| GP Flume E | 0-4 | 6/23/16 | <0.0086 | <0.0077 | <0.0089 | <0.006 | <0.0062 | <0.0086 | <0.0066 | <0.0095 | <0.008 | <0.0063 | <0.0086 | <0.0086 | <0.0065 | <0.0086 | <0.0086 | <0.0086 | <0.0086 |
| GP MW-16 | 0-4 | 6/23/16 | <0.0098 | <0.0088 | <0.0101 | <0.0068 | <0.007 | <0.0098 | <0.0075 | <0.0108 | <0.009 | <0.0072 | <0.0098 | <0.0098 | <0.0074 | <0.0098 | <0.0098 | <0.0098 | <0.0098 |
| GP RW-8 | 0-4 | 6/23/16 | <0.0088 | <0.0079 | <0.0092 | 0.248 | 0.287 | 0.0364 | 0.164 J | 0.0189 | 0.0287 | <0.0065 | 0.0267 | <0.0088 | 0.0144 | <0.0088 | <0.0088 | <0.0088 | 0.0257 |

Table A.2
Group A Closure – Soil Analytical Results
Tables Non-Industrial Direct Contact RCLs -
Inorganics Trent Tube Plant No. 1
2188 Church Street, East Troy, Wisconsin

| Sample Name | Sample Depth (ft) | Sample Date | Arsenic | Barium | Cadmium | Chromium | Chromium, hexavalent | Lead | Mercury | Nickel | Selenium | Silver |
|-------------------------|-------------------|-------------|---------------|-----------------|--------------|--------------|----------------------|--------------|-------------|-----------------|-----------------|-----------------|
| RCL | | | 613 | 1.53E+07 | 70000 | 1E+08 | 293 | 4E+05 | 3130 | 1.55E+06 | 3.91E+05 | 3.91E+05 |
| MW-17 Area | | | | | | | | | | | | |
| GP-14 | 1-3 | 4/23/96 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| GP-19 | 1-3 | 4/24/96 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| MW-17 | 3-5 | 6/13/96 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| MW-18 | 3-5 | 6/14/96 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| HP-18 | 1-3 | 11/16/98 | 2030 | 26000 | <1010 | 7910 | NA | 3440 | <100 | 5660 | <1010 | <1010 |
| HP-19 | 1-3 | 11/16/98 | <1010 | 6880 | <1010 | 2830 | NA | 2020 | <110 | 2230 | <1010 | <1010 |
| HP-20 | 3-5 | 11/16/98 | 1790 | 15800 | <1110 | 6690 | NA | 3560 | <110 | 5800 | <1110 | <1110 |
| HP-21 | 2-4 | 11/16/98 | 3150 | 48600 | <1130 | 10800 | NA | 5620 | <110 | 7640 | <1130 | <1130 |
| HP-22 | 1-3 | 11/16/98 | <1100 | 28100 | <1100 | 5040 | NA | 3950 | <110 | 4170 | <1100 | <1100 |
| HP-23 | 2-4 | 11/17/98 | 3070 | 16800 | <1100 | 15500 | NA | 5470 | <110 | 10100 | <1100 | <1100 |
| HP-24 | 3-5 | 11/16/98 | <1040 | 6050 | <1040 | 2510 | NA | 1460 | <110 | 2510 | <1040 | <1040 |
| HP-25 | 1-3 | 11/16/98 | <1100 | 7980 | <1100 | 3100 | NA | 1550 | <120 | 3100 | <1100 | <1100 |
| HP-72 | 1-3 | 11/17/98 | <1080 | 6450 | <1080 | 6880 | NA | 1290 | <110 | 7530 | <1080 | <1080 |
| HP-73 | 1-3 | 11/17/98 | 4670 | 10400 | <1070 | 9550 | NA | 6360 | <110 | 7000 | <1070 | <1070 |
| GA-SA7 | 0-4 | 11/10/16 | 3400 J | 45100 | 170 J | 107000 | <1380 | 19100 | <52 | 87100 | 1400 J | <370 |
| GP-18 Area | | | | | | | | | | | | |
| GP-18 | 3-5 | 4/24/96 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| HP-66 | 1-3 | 11/16/98 | <1030 | 3720 | <1030 | 1450 | 14000 | 1660 | <100 | 1240 | <1030 | <1030 |
| MW-21 | 4-5 | 3/24/99 | 2580 | 6240 | <1080 | 281000 | 5710 | 1510 | <110 | 39100 | <1080 | <1080 |
| MW-22 | 6-8 | 3/24/99 | 2680 | 12800 | <1110 | 8720 | <2300 | 2240 | <110 | 4700 | <1110 | <1110 |
| GA-SA1 | 0-4 | 11/10/16 | 2700 J | 44200 | <140 | 122000 | <1290 | 16500 | <38 | 100000 | 1600 J | <350 |
| GA-SA2 | 0-4 | 11/10/16 | 1900 J | 16300 | <140 | 11000 | <1320 | 4100 | <38 | 9800 | <120 | <360 |
| GA-SA3 | 0-4 | 11/10/16 | 2000 J | 23200 | <140 | 102000 | <1310 | 4100 | <39 | 98900 | 1400 J | <370 |
| GA-SA4 | 0-4 | 11/10/16 | 2700 J | 20200 | <140 | 92200 | <1310 | 10000 | <37 | 77700 | <120 | <360 |
| GA-SA5 | 0-4 | 11/10/16 | 3000 J | 26400 | <140 | 260000 | <1330 | 5600 | <39 | 155000 | <120 | <360 |
| GA-SA6 | 0-4 | 11/10/16 | 2200 J | 11500 | <140 | 40700 | <1290 | 3700 | <36 | 52200 | <120 | <360 |
| MW-16/Flume Area | | | | | | | | | | | | |
| GP-8 | 1-3 | 4/23/96 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| GP-8 | 9-10 | 4/23/96 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| GP-12 | 1-3 | 4/23/96 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| GP-13 | 1-3 | 4/23/96 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| GP-17 | 1-3 | 4/23/96 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| GP-20 | 3-5 | 4/25/96 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| HP-26 | 3-5 | 11/17/98 | 8940 | 40100 | <1200 | 21200 | NA | 14800 | <120 | 17800 | <1200 | <1200 |
| HP-27 | 5-7 | 11/16/98 | 2810 | 31800 | <1090 | 10200 | NA | 5670 | <110 | 12900 | <1090 | <1090 |
| HP-28 | 1-3 | 11/17/98 | 1700 | 8480 | <1050 | 6360 | NA | 2750 | <110 | 4870 | <1050 | <1050 |
| HP-69 | 1-3 | 11/17/98 | <1130 | 10900 | <1130 | 9520 | NA | 3850 | <110 | 7470 | <1130 | <1130 |
| HP-75 | 5-7 | 11/18/98 | 4020 | 30300 | <1110 | 13000 | NA | 7820 | <110 | 10900 | <1110 | <1110 |
| HP-75 | 9-11 | 11/18/98 | 4890 | 48700 | <1170 | 12800 | NA | 12400 | <120 | 15200 | <1170 | <1170 |
| MW-16 | 3-5 | 6/13/96 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| RW-8 | 6-8 | 3/23/99 | 8990 | 74900 | <1250 | 32100 | <2500 | 13500 | <120 | 28200 | <1250 | <1250 |
| GA-SA8 | 0-4 | 11/10/16 | 1100 J | 10300 | <130 | 6400 | <1360 | 3500 | <35 | 5900 | 1200 J | <350 |
| GA-SA9 | 0-4 | 11/10/16 | 2700 J | 45700 | <130 | 15400 | <1300 | 8100 | <40 | 11900 | <110 | <340 |

Table A.2
Group A Closure – Soil Analytical Results Tables
Groundwater Protection RCLs – Volatile Organic Compounds
Trent Tube Plant No. 1
2188 Church Street, East Troy, Wisconsin

| Sample Name | Sample Depth (ft) | Sample Date | m+p Xylene | Methylene chloride | Naphthalene (8260) | n-Propylbenzene | Styrene | 1,1,2,2-Tetrachloroethane | Tetrachloroethene | Toluene | 1,2,3-Trichlorobenzene | 1,2,4-Trichlorobenzene | 1,1,1-Trichloroethane | 1,1,2-Trichloroethane | Trichloroethene | 1,2,4-Trimethylbenzene | 1,3,5-Trimethylbenzene | Vinyl chloride | o-Xylene | Total Xylene |
|-------------------------|-------------------|-------------|------------|--------------------|--------------------|-----------------|------------|---------------------------|-------------------|-------------|------------------------|------------------------|-----------------------|-----------------------|-----------------|------------------------|------------------------|----------------|-----------|--------------|
| RCL | | | NE | 2.6 | 658 | NE | 220 | 0.156 | 4.6 | 1108 | NE | 408 | 140.2 | 3.2 | 3.6 | NE | NE | 0.138 | NE | 3960 |
| MW-17 Area | | | | | | | | | | | | | | | | | | | | |
| GP-14 | 1-3 | 4/23/96 | NA | NA | NA | NA | NA | NA | 6 | NA | NA | NA | NA | NA | 6 | NA | NA | NA | NA | NA |
| GP-19 | 1-3 | 4/24/96 | <50 | <250 | <25 | <25 | NA | <25 | <25 | <25 | <25 | <25 | <25 | <25 | <25 | <25 | <25 | <25 | <25 | <75 |
| MW-17 | 3-5 | 6/13/96 | NA | <28 | <28 | <28 | <28 | <28 | <28 | 162 | <28 | <28 | <28 | <28 | 2310 | <28 | <28 | <28 | NA | <28 |
| MW-18 | 3-5 | 6/14/96 | NA | <28 | <30 | <30 | <30 | <30 | <30 | 243 | <30 | <30 | <30 | <30 | <30 | <30 | <30 | <30 | NA | <30 |
| HP-18 | 1-3 | 11/16/98 | NA | <505.1 | <50.5 | <50.5 | <50.5 | <50.5 | <50.5 | <50.5 | <50.5 | <50.5 | <50.5 | <50.5 | <50.5 | <50.5 | <50.5 | <50.5 | NA | <50.5 |
| HP-19 | 1-3 | 11/16/98 | NA | <526.3 | <52.6 | <52.6 | <52.6 | <52.6 | <52.6 | <52.6 | <52.6 | <52.6 | <52.6 | <52.6 | <52.6 | <52.6 | <52.6 | <52.6 | NA | <52.6 |
| HP-20 | 3-5 | 11/16/98 | NA | <561.8 | <56.2 | <56.2 | <56.2 | <56.2 | <56.2 | <56.2 | <56.2 | <56.2 | <56.2 | <56.2 | <56.2 | <56.2 | <56.2 | <56.2 | NA | <56.2 |
| HP-21 | 2-4 | 11/16/98 | NA | <574.7 | <57.5 | <57.5 | <57.5 | <57.5 | <57.5 | <57.5 | <57.5 | <57.5 | <57.5 | <57.5 | <57.5 | <57.5 | <57.5 | <57.5 | NA | <57.5 |
| HP-22 | 1-3 | 11/16/98 | NA | <537.6 | <53.8 | <53.8 | <53.8 | <53.8 | <53.8 | <53.8 | <53.8 | <53.8 | <53.8 | <53.8 | <53.8 | <53.8 | <53.8 | <53.8 | NA | <53.8 |
| HP-23 | 2-4 | 11/17/98 | NA | <543.5 | <54.3 | <54.3 | <54.3 | <54.3 | <54.3 | <54.3 | <54.3 | <54.3 | <54.3 | <54.3 | <54.3 | <54.3 | <54.3 | <54.3 | NA | <54.3 |
| HP-24 | 3-5 | 11/16/98 | NA | <526.3 | <52.6 | <52.6 | <52.6 | <52.6 | <52.6 | <52.6 | <52.6 | <52.6 | <52.6 | <52.6 | <52.6 | <52.6 | <52.6 | <52.6 | NA | <52.6 |
| HP-25 | 1-3 | 11/16/98 | NA | <581.4 | <58.1 | <58.1 | <58.1 | <58.1 | <58.1 | <58.1 | <58.1 | <58.1 | <58.1 | <58.1 | <58.1 | <58.1 | <58.1 | <58.1 | NA | <58.1 |
| HP-72 | 1-3 | 11/17/98 | NA | <537.6 | <53.8 | <53.8 | <53.8 | <53.8 | <53.8 | <53.8 | <53.8 | <53.8 | <53.8 | <53.8 | <53.8 | <53.8 | <53.8 | <53.8 | NA | <53.8 |
| HP-73 | 1-3 | 11/17/98 | NA | <549.5 | <54.9 | <54.9 | <54.9 | <54.9 | <54.9 | <54.9 | <54.9 | <54.9 | <54.9 | <54.9 | <54.9 | <54.9 | <54.9 | <54.9 | NA | <54.9 |
| GA-SA7 | 0-4 | 11/10/16 | NA | <25 | <40 | <25 | <25 | <25 | <25 | <25 | <25 | <47.6 | <25 | <25 | 39.3 J | <25 | <25 | <25 | <25 | NA |
| GP-18 Area | | | | | | | | | | | | | | | | | | | | |
| GP-18 | 3-5 | 4/24/96 | <50 | NA | 320 | <25 | NA | <25 | <25 | <25 | <25 | <25 | <25 | <25 | <25 | 96 | 31 | <25 | <25 | <75 |
| HP-66 | 1-3 | 11/16/98 | NA | <515.5 | <51.5 | <51.5 | <51.5 | <51.5 | <51.5 | <51.5 | <51.5 | <51.5 | <51.5 | <51.5 | <51.5 | <51.5 | <51.5 | <51.5 | NA | <51.5 |
| MW-21 | 4-5 | 3/24/99 | NA | <549.5 | <109.9 | <109.9 | <109.9 | <109.9 | <109.9 | <109.9 | <109.9 | <109.9 | <109.9 | <109.9 | <109.9 | <109.9 | <109.9 | <109.9 | NA | <109.9 |
| MW-22 | 6-8 | 3/24/99 | NA | <574.7 | <114.9 | <114.9 | <114.9 | <114.9 | <114.9 | <114.9 | <114.9 | <114.9 | <114.9 | <114.9 | <114.9 | <114.9 | <114.9 | <114.9 | NA | <114.9 |
| MW-16/Flume Area | | | | | | | | | | | | | | | | | | | | |
| GP-8 | 1-3 | 4/23/96 | NA | NA | NA | NA | NA | NA | <5 | NA | NA | NA | NA | NA | 8 | NA | NA | NA | NA | NA |
| GP-8 | 9-10 | 4/23/96 | NA | NA | NA | NA | NA | NA | <5 | NA | NA | NA | NA | NA | <5 | NA | NA | NA | NA | NA |
| GP-12 | 1-3 | 4/23/96 | NA | NA | NA | NA | NA | NA | <5 | NA | NA | NA | NA | NA | 54 | NA | NA | NA | NA | NA |
| GP-13 | 1-3 | 4/23/96 | NA | NA | NA | NA | NA | NA | 51 | NA | NA | NA | NA | NA | 23 | NA | NA | NA | NA | NA |
| GP-17 | 1-3 | 4/23/96 | NA | NA | NA | NA | NA | NA | <5 | NA | NA | NA | NA | NA | 1100 J | NA | NA | NA | NA | NA |
| GP-20 | 3-5 | 4/25/96 | NA | <250 | <25 | <25 | NA | <25 | <25 | <25 | <25 | <25 | <25 | <25 | <25 | <25 | <25 | <25 | <25 | <75 |
| HP-26 | 3-5 | 11/17/98 | <50 | <595.2 | <59.5 | <59.5 | <59.5 | <59.5 | <59.5 | <59.5 | <59.5 | <59.5 | 2080 | <59.5 | <59.5 | <59.5 | <59.5 | <59.5 | NA | <59.5 |
| HP-27 | 5-7 | 11/16/98 | NA | <555.8 | <55.6 | <55.6 | <55.6 | <55.6 | <55.6 | <55.6 | <55.6 | <55.6 | <55.6 | <55.6 | 166.7 | <55.6 | <55.6 | <55.6 | NA | <55.6 |
| HP-28 | 1-3 | 11/17/98 | NA | <543.5 | <54.3 | <54.3 | <54.3 | <54.3 | <54.3 | <54.3 | <54.3 | <54.3 | <54.3 | <54.3 | <54.3 | <54.3 | <54.3 | <54.3 | NA | <54.3 |
| HP-69 | 1-3 | 11/17/98 | NA | <561.8 | <56.2 | <56.2 | <56.2 | <56.2 | <56.2 | <56.2 | <56.2 | <56.2 | <56.2 | <56.2 | <56.2 | <56.2 | <56.2 | <56.2 | NA | <56.2 |
| HP-75 | 5-7 | 11/18/98 | NA | <588.2 | <58.8 | <58.8 | <58.8 | <58.8 | <58.8 | <58.8 | <58.8 | <58.8 | <58.8 | <58.8 | 170.5 | <58.8 | <58.8 | <58.8 | NA | <58.8 |
| HP-75 | 9-11 | 11/18/98 | NA | <602.4 | <60.2 | <60.2 | <60.2 | <60.2 | <60.2 | <60.2 | <60.2 | <60.2 | <60.2 | <60.2 | 542.2 | <60.2 | <60.2 | <60.2 | NA | <60.2 |
| MW-16 | 3-5 | 6/13/96 | NA | <27 | <27 | <27 | <27 | <27 | <27 | <27 | <27 | <27 | <27 | <27 | 629 | <27 | <27 | <27 | NA | <27 |
| RW-8 | 6-8 | 3/23/99 | NA | <625 | <62.5 | <62.5 | <62.5 | <62.5 | <62.5 | <62.5 | <62.5 | <62.5 | <62.5 | <62.5 | <62.5 | <62.5 | <62.5 | <62.5 | NA | <62.5 |

Table A.2
Group A Closure – Soil Analytical Results Tables
Groundwater Protection RCLs – Inorganics
Trent Tube Plant No. 1
2188 Church Street, East Troy, Wisconsin

| Sample Name | Sample Depth (ft) | Sample Date | Arsenic | Barium | Cadmium | Chromium | Chromium, hexavalent | Lead | Mercury | Nickel | Selenium | Silver |
|-------------------------|-------------------|-------------|---------------|-----------------|------------|----------------|----------------------|--------------|------------|---------------|---------------|------------|
| RCL | | | 584 | 1.65E+05 | 752 | 3.6E+08 | NE | 27000 | 208 | 13060 | 520 | 850 |
| MW-17 Area | | | | | | | | | | | | |
| GP-14 | 1-3 | 4/23/96 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| GP-19 | 1-3 | 4/24/96 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| MW-17 | 3-5 | 6/13/96 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| MW-18 | 3-5 | 6/14/96 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| HP-18 | 1-3 | 11/16/98 | 2030 | 26000 | <1010 | 7910 | NA | 3440 | <100 | 5660 | <1010 | <1010 |
| HP-19 | 1-3 | 11/16/98 | <1010 | 6880 | <1010 | 2830 | NA | 2020 | <110 | 2230 | <1010 | <1010 |
| HP-20 | 3-5 | 11/16/98 | 1790 | 15800 | <1110 | 6690 | NA | 3560 | <110 | 5800 | <1110 | <1110 |
| HP-21 | 2-4 | 11/16/98 | 3150 | 48600 | <1130 | 10800 | NA | 5620 | <110 | 7640 | <1130 | <1130 |
| HP-22 | 1-3 | 11/16/98 | <1100 | 28100 | <1100 | 5040 | NA | 3950 | <110 | 4170 | <1100 | <1100 |
| HP-23 | 2-4 | 11/17/98 | 3070 | 16800 | <1100 | 15500 | NA | 5470 | <110 | 10100 | <1100 | <1100 |
| HP-24 | 3-5 | 11/16/98 | <1040 | 6050 | <1040 | 2510 | NA | 1460 | <110 | 2510 | <1040 | <1040 |
| HP-25 | 1-3 | 11/16/98 | <1100 | 7980 | <1100 | 3100 | NA | 1550 | <120 | 3100 | <1100 | <1100 |
| HP-72 | 1-3 | 11/17/98 | <1080 | 6450 | <1080 | 6880 | NA | 1290 | <110 | 7530 | <1080 | <1080 |
| HP-73 | 1-3 | 11/17/98 | 4670 | 10400 | <1070 | 9550 | NA | 6360 | <110 | 7000 | <1070 | <1070 |
| GA-SA7 | 0-4 | 11/10/16 | 3400 J | 45100 | 170 J | 107000 | <1380 | 19100 | <52 | 87100 | 1400 J | <370 |
| GP-18 Area | | | | | | | | | | | | |
| GP-18 | 3-5 | 4/24/96 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| HP-66 | 1-3 | 11/16/98 | <1030 | 3720 | <1030 | 1450 | 14000 | 1660 | <100 | 1240 | <1030 | <1030 |
| MW-21 | 4-5 | 3/24/99 | 2580 | 6240 | <1080 | 281000 | 5710 | 1510 | <110 | 39100 | <1080 | <1080 |
| MW-22 | 6-8 | 3/24/99 | 2680 | 12800 | <1110 | 8720 | <2300 | 2240 | <110 | 4700 | <1110 | <1110 |
| GA-SA1 | 0-4 | 11/10/16 | 2700 J | 44200 | <140 | 122000 | <1290 | 16500 | <38 | 100000 | 1600 J | <350 |
| GA-SA2 | 0-4 | 11/10/16 | 1900 J | 16300 | <140 | 11000 | <1320 | 4100 | <38 | 9800 | <120 | <360 |
| GA-SA3 | 0-4 | 11/10/16 | 2000 J | 23200 | <140 | 102000 | <1310 | 4100 | <39 | 98900 | 1400 J | <370 |
| GA-SA4 | 0-4 | 11/10/16 | 2700 J | 20200 | <140 | 92200 | <1310 | 10000 | <37 | 77700 | <120 | <360 |
| GA-SA5 | 0-4 | 11/10/16 | 3000 J | 26400 | <140 | 260000 | <1330 | 5600 | <39 | 155000 | <120 | <360 |
| GA-SA6 | 0-4 | 11/10/16 | 2200 J | 11500 | <140 | 40700 | <1290 | 3700 | <36 | 52200 | <120 | <360 |
| MW-16/Flume Area | | | | | | | | | | | | |
| GP-8 | 1-3 | 4/23/96 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| GP-8 | 9-10 | 4/23/96 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| GP-12 | 1-3 | 4/23/96 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| GP-13 | 1-3 | 4/23/96 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| GP-17 | 1-3 | 4/23/96 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| GP-20 | 3-5 | 4/25/96 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| HP-26 | 3-5 | 11/17/98 | 8940 | 40100 | <1200 | 21200 | NA | 14800 | <120 | 17800 | <1200 | <1200 |
| HP-27 | 5-7 | 11/16/98 | 2810 | 31800 | <1090 | 10200 | NA | 5670 | <110 | 12900 | <1090 | <1090 |
| HP-28 | 1-3 | 11/17/98 | 1700 | 8480 | <1050 | 6360 | NA | 2750 | <110 | 4870 | <1050 | <1050 |
| HP-69 | 1-3 | 11/17/98 | <1130 | 10900 | <1130 | 9520 | NA | 3850 | <110 | 7470 | <1130 | <1130 |
| HP-75 | 5-7 | 11/18/98 | 4020 | 30300 | <1110 | 13000 | NA | 7820 | <110 | 10900 | <1110 | <1110 |
| HP-75 | 9-11 | 11/18/98 | 4890 | 48700 | <1170 | 12800 | NA | 12400 | <120 | 15200 | <1170 | <1170 |
| MW-16 | 3-5 | 6/13/96 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| RW-8 | 6-8 | 3/23/99 | 8990 | 74900 | <1250 | 32100 | <2500 | 13500 | <120 | 28200 | <1250 | <1250 |
| GA-SA8 | 0-4 | 11/10/16 | 1100 J | 10300 | <130 | 6400 | <1360 | 3500 | <35 | 5900 | 1200 J | <350 |
| GA-SA9 | 0-4 | 11/10/16 | 2700 J | 45700 | <130 | 15400 | <1300 | 8100 | <40 | 11900 | <110 | <340 |

Table A.3
Group A Closure – Residual Soil Analytical Results
Non-Industrial Direct Contact and Groundwater Protection RCLs
Trent Tube Plant No. 1
2188 Church Street, East Troy, Wisconsin

Explanation

| | |
|--------------|---|
| TOC – | Total Organic Carbon |
| NA – | Not analyzed |
| NE - | Not established |
| NR - | Not reported |
| < - | Analyte not detected at quantitation limit – not detected |
| J - | Estimated |
| 123 - | Bold indicates exceedance of RCL |
| TOC - | Total organic carbon |
| HP - | Hydraulic probe |
| GP - | Geoprobe |
| MW - | Monitoring well |
| RW - | Recovery well |

All concentration values are in µg/kg unless noted.

Note: All samples listed were collected above the water table (unsaturated zone).

Table A.3
Group A Closure – Residual Soil Analytical Results
Non-Industrial Direct Contact RCLs – Volatile Organic Compounds
Trent Tube Plant No. 1
2188 Church Street, East Troy, Wisconsin

| Sample Name | Sample Depth (ft) | Sample Date | TOC (mg/kg) | Acetone | Benzene | 2-Butanone | n-Butylbenzene | sec-Butylbenzene | Carbon Tetrachloride | Chloroethane | Chloroform | Chloromethane | 2-Chlorotoluene | 1,1-Dichloroethane | 1,2-Dichloroethane | 1,1-Dichloroethene | cis-1,2-Dichloroethene | trans-1,2-Dichloroethene | 1,2-Dichloroethenes (total) | Ethylbenzene | Hexachlorobutadiene |
|--|-------------------|-------------|-------------|----------|---------|------------|----------------|------------------|----------------------|--------------|------------|---------------|-----------------|--------------------|--------------------|--------------------|------------------------|--------------------------|-----------------------------|--------------|---------------------|
| Non-Industrial Direct Contact RCL | | | NE | 6.38E+07 | 1490 | 2.84E+07 | 1.08E+05 | 1.45E+05 | 854 | NE | 423 | 1.71E+05 | NE | 4720 | 608 | 3.42E+05 | 1.56E+05 | 1.56E+06 | NE | 7470 | 1510 |
| Groundwater Protection RCL | | | NE | 3676 | 5.2 | 1666 | NE | NE | 3.8 | 226 | 3.4 | 15.6 | NE | 484 | 2.8 | 5 | 41.2 | 62.6 | NE | 1570 | NE |
| MW-17 Area | | | | | | | | | | | | | | | | | | | | | |
| GA-SA7 | 0-4 | 11/10/16 | NA | NA | <25 | NA | <25 | <25 | <25 | <67 | <46.4 | <25 | <25 | <25 | <25 | <25 | <25 | <25 | NA | <25 | <25 |

| Sample Name | Sample Depth (ft) | Sample Date | p-isopropyltoluene | m+p Xylene | Methylene chloride | Naphthalene (8260) | n-Propylbenzene | Styrene | 1,1,1,2-Tetrachloroethane | Tetrachloroethene | Toluene | 1,2,3-Trichlorobenzene | 1,2,4-Trichlorobenzene | 1,1,1-Trichloroethane | 1,1,2-Trichloroethane | Trichloroethene | 1,2,4-Trimethylbenzene | 1,3,5-Trimethylbenzene | Vinyl chloride | o-Xylene | Total Xylene | |
|--|-------------------|-------------|--------------------|------------|--------------------|--------------------|-----------------|----------|---------------------------|-------------------|----------|------------------------|------------------------|-----------------------|-----------------------|-----------------|------------------------|------------------------|----------------|----------|--------------|----|
| Non-Industrial Direct Contact RCL | | | 1.62E+05 | 7.78E+05 | 60700 | 5150 | NE | 8.67+E05 | 753 | 30700 | 8.18E+05 | 62600 | 22000 | 6.4E+05 | 1480 | 1260 | 89800 | 1.82E+05 | 67 | 4.34E+05 | 2.6E+05 | |
| Groundwater Protection RCL | | | NE | NE | 2.6 | 658 | NE | 220 | 0.156 | 4.6 | 1108 | NE | 408 | 140.2 | 3.2 | 3.6 | NE | NE | 0.138 | NE | 3960 | |
| MW-17 Area | | | | | | | | | | | | | | | | | | | | | | |
| GA-SA7 | 0-4 | 11/10/16 | <25 | NA | <25 | <40 | <25 | <25 | <25 | <25 | <25 | <25 | <25 | <47.6 | <25 | <25 | 39.3 J | <25 | <25 | <25 | <25 | NA |

Table A.3
Group A Closure – Residual Soil Analytical Results
Non-Industrial Direct Contact RCLs – Inorganics
Trent Tube Plant No. 1
2188 Church Street, East Troy, Wisconsin

| Sample Name | Sample Depth (ft) | Sample Date | Arsenic | Barium | Cadmium | Chromium | Chromium, hexavalent | Lead | Mercury | Nickel | Selenium | Silver |
|--|-------------------|-------------|------------|-----------------|------------|----------------|----------------------|--------------|------------|---------------|---------------|------------|
| Non-Industrial Direct Contact RCL | | | 613 | 1.53E+07 | 70000 | 1E+08 | 293 | 4E+05 | 3130 | 1.55E+06 | 3.91E+05 | 3.91E+05 |
| Groundwater Protection RCL | | | 584 | 1.65E+05 | 752 | 3.6E+08 | NE | 27000 | 208 | 13060 | 520 | 850 |
| MW-17 Area | | | | | | | | | | | | |
| GA-SA7 | 0-4 | 11/10/16 | 3400 J | 45100 | 170 J | 107000 | <1380 | 19100 | <52 | 87100 | 1400 J | <370 |
| GP-18 Area | | | | | | | | | | | | |
| GA-SA1 | 0-4 | 11/10/16 | 2700 J | 44200 | <140 | 122000 | <1290 | 16500 | <38 | 100000 | 1600 J | <350 |
| GA-SA3 | 0-4 | 11/10/16 | 2000 J | 23200 | <140 | 102000 | <1310 | 4100 | <39 | 98900 | 1400 J | <370 |
| GA-SA4 | 0-4 | 11/10/16 | 2700 J | 20200 | <140 | 92200 | <1310 | 10000 | <37 | 77700 | <120 | <360 |
| GA-SA5 | 0-4 | 11/10/16 | 3000 J | 26400 | <140 | 260000 | <1330 | 5600 | <39 | 155000 | <120 | <360 |
| GA-SA6 | 0-4 | 11/10/16 | 2200 J | 11500 | <140 | 40700 | <1290 | 3700 | <36 | 52200 | <120 | <360 |
| MW-16/Flume Area | | | | | | | | | | | | |
| GA-SA8 | 0-4 | 11/10/16 | 1100 J | 10300 | <130 | 6400 | <1360 | 3500 | <35 | 5900 | 1200 J | <350 |

**Table A.6 Groundwater
Elevations BRRTS No.
02-65-245827 Group A
Site Closure Trent Tube
Plant 1
2188 Church Street
East Troy, Wisconsin**

| Monitoring Well | MW-1R | MW-2 | MW-4 | MW-4A | MW-6 | MW-6A | MW-7 | MW-8 | MW-11 | MW-12 | MW-15 | MW-16 | MW-17R | MW-19 | MW-20 | MW-21 | MW-22 | MW-23 | MW-24 | MW-25 | MW-26 | MW-27 | MW-28 | MW-29 | MW-30 | MW-31 | | |
|--------------------------------------|--|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|-----------|--------|-----------|--------|-----------|--------|-----------|--------|-----------|-----------|--|--|
| 3/07 to Present | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Elevation of Ground Surface(ft amsl) | 838.16 | 834.33 | 837.25 | 837.40 | 831.28 | 830.94 | 820.44 | 818.54 | 837.80 | 832.84 | 830.17 | 837.20 | 837.12 | 818.80 | 819.58 | 837.31 | 837.27 | 817.81 | 817.38 | 824.42 | 819.51 | 820.59 | 820.25 | 825.57 | 820.45 | 821.10 | | |
| Elevation of PVC Pipe (ft amsl) | 840.17 | 836.92 | 839.07 | 838.78 | 833.33 | 833.33 | 824.60 | 821.13 | 844.76 | 836.67 | 832.71 | 839.52 | 839.54 | 822.52 | 824.04 | 840.33 | 836.89 | 820.69 | 820.19 | 824.77 | 822.02 | 823.47 | 823.01 | 828.29 | 822.57 | 824.01 | | |
| Elevation of Protop (ft amsl) | 840.49 | 837.09 | 839.53 | 839.00 | 833.46 | 833.57 | 822.98 | 821.36 | 840.61 | 832.76 | 832.88 | 839.92 | 839.73 | NP | NP | 840.44 | 837.27 | | | | | | | | | | | |
| Date measured | Depth to groundwater, feet below top of casing | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 8/15/2007 | 12.57 | 9.33 | 11.43 | 12.87 | 11.79 | 13.08 | 4.51 | 4.45 | 11.80 | 9.57 | 9.66 | 8.02 | NM | 4.79 | 4.35 | 4.21 | 6.22 | 4.61 | 1.78 | 7.71 | 4.11 | 4.55 | 3.73 | 6.89 | 3.67 | 5.17 | | |
| 11/21/2007 | 13.31 | 9.87 | 13.40 | 13.99 | 16.45 | 14.99 | 7.28 | 4.32 | 12.04 | 11.06 | 15.32 | 9.39 | NM | 4.72 | 6.28 | 4.82 | 7.08 | 4.62 | 3.73 | 6.16 | 4.04 | 4.56 | 3.78 | 7.46 | 3.71 | 5.21 | | |
| 3/6/2008 | 12.78 | 9.31 | 11.75 | 13.35 | 13.27 | 13.92 | 5.88 | ice | 11.41 | 9.92 | 13.39 | 8.38 | NM | ice | 4.56 | 1.22 | 6.26 | 3.93 | 3.12 | 5.18 | 3.54 | 3.97 | 3.23 | 4.31 | 3.47 | 4.63 | | |
| 4/3/2008 | 11.61 | 8.91 | 11.13 | 12.97 | 11.54 | 13.17 | 5.04 | 3.43 | 11.18 | 8.86 | 10.23 | 7.84 | NM | 3.74 | 3.05 | 4.52 | 5.85 | 3.80 | 2.92 | 4.98 | 3.38 | 3.78 | 3.04 | 4.22 | 3.45 | 4.44 | | |
| 7/31/2008 | 12.77 | 9.53 | 11.78 | 13.21 | 11.84 | 13.74 | 7.24 | 4.54 | 10.96 | 9.69 | 14.79 | 8.46 | NM | 4.67 | 6.01 | 3.80 | 6.13 | 4.86 | 3.87 | 8.92 | 4.06 | 5.04 | 4.67 | 8.99 | 4.26 | 5.61 | | |
| 12/5/2008 | 11.28 | 9.94 | 13.40 | 20.96 | 13.22 | 20.12 | 6.25 | 3.90 | 12.29 | NM | 12.10 | NM | NM | 4.40 | 5.88 | 5.03 | 7.23 | 4.12 | 3.23 | 6.11 | NM | 4.30 | 3.51 | 6.18 | NM | NM | | |
| 4/10/2012 | 13.44 | 10.01 | 13.21 | 14.16 | 15.21 | 15.34 | 6.35 | 5.02 | 12.36 | 13.30 | 15.08 | 11.91 | 7.97 | 5.21 | 5.85 | 7.55 | NM | 5.57 | NM | 5.71 | NM | 4.54 | 3.96 | 6.45 | NM | NM | | |
| 8/14/2012 | 13.70 | 10.25 | 13.66 | NM | 15.99 | NM | NM | NM | 12.96 | 15.20 | NM | 12.27 | 8.33 | 5.75 | 8.35 | NM | NM | NM | NM | NM | NM | NM | NM | NM | NM | NM | | |
| 11/14/2012 | 13.32 | 9.88 | 13.25 | 14.22 | 16.80 | 15.35 | 7.31 | 4.80 | 12.97 | 15.02 | 16.10 | 11.98 | 8.18 | 5.19 | 6.56 | 4.10 | NM | NM | NM | NM | NM | NM | NM | NM | NM | NM | | |
| 3/7/2013 | 13.40 | 9.95 | 13.60 | NM | 16.11 | NM | 6.94 | NM | 12.31 | 13.95 | 14.30 | 11.90 | 7.70 | 5.19 | 5.69 | NM | NM | NM | NM | NM | NM | NM | NM | NM | NM | NM | | |
| 7/20/2013 | 12.65 | 9.45 | 11.51 | 12.78 | 11.83 | 13.16 | 7.42 | 5.17 | 11.06 | 12.70 | 16.01 | 11.15 | 6.59 | 5.30 | 6.66 | 7.26 | NM | NM | NM | NM | NM | NM | NM | NM | NM | NM | | |
| 3/21/2014 | 12.90 | 9.60 | 12.50 | NM | 13.25 | NM | NM | NM | 12.03 | 13.50 | 12.45 | 10.90 | 6.50 | 4.40 | 4.60 | 7.00 | NM | NM | NM | NM | NM | NM | NM | NM | NM | NM | | |
| 6/2/2014 | 13.10 | 9.74 | 11.99 | 13.54 | 12.35 | 13.58 | 6.85 | 5.10 | 11.82 | 13.10 | 15.40 | 11.57 | 6.87 | 5.20 | 6.20 | 7.84 | NM | NM | NM | NM | NM | NM | NM | NM | NM | NM | | |
| 9/9/2014 | 13.47 | 10.03 | 13.37 | 14.20 | 15.97 | 15.00 | 7.47 | 5.30 | 12.30 | 13.94 | 17.10 | 12.15 | 7.20 | 5.50 | 7.00 | 8.35 | NM | NM | NM | NM | NM | NM | NM | NM | NM | NM | | |
| 12/8/2014 | 14.25 | 10.06 | 13.83 | 14.42 | 16.25 | 14.87 | 6.90 | 4.80 | 12.71 | 15.00 | 16.02 | 12.40 | 7.75 | 5.40 | 6.07 | 8.75 | NM | NM | NM | NM | NM | NM | NM | NM | NM | NM | | |
| 3/16/2015 | 13.41 | 9.85 | 13.50 | 15.40 | 13.60 | 13.42 | 6.55 | 4.42 | 12.62 | 12.42 | 14.85 | 12.06 | 6.65 | 5.07 | 4.84 | 8.25 | NM | 5.50 | NM | 5.25 | NM | 4.37 | NM | 4.55 | NM | NM | | |
| 5/19/2015 | 13.42 | 9.90 | 13.22 | 14.43 | 18.38 | 16.09 | 7.77 | 5.26 | 12.58 | 14.48 | 16.31 | 11.96 | 7.81 | 6.22 | 6.51 | 8.61 | NM | 5.77 | 5.41 | 5.91 | Abandoned | 4.78 | Abandoned | 7.04 | Abandoned | Abandoned | | |
| 6/17/2016 | 13.46 | 10.08 | 13.11 | 13.84 | 14.15 | 13.71 | 7.07 | 4.69 | 11.95 | 13.76 | 12.77 | 12.08 | 6.57 | 5.15 | 5.65 | 7.94 | Abandoned | NM | Abandoned | 6.31 | Abandoned | 4.69 | Abandoned | 7.07 | Abandoned | Abandoned | | |
| | Groundwater elevation (ft amsl) | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 8/15/2007 | 827.60 | 827.59 | 827.64 | 825.91 | 821.54 | 820.25 | 818.24 | 816.68 | 832.63 | 827.10 | 823.05 | 828.72 | NM | 817.73 | 818.36 | 832.52 | 830.67 | 816.08 | 818.41 | 817.06 | 817.91 | 818.92 | 819.28 | 821.40 | 818.90 | 818.84 | | |
| 11/21/2007 | 826.86 | 827.05 | 825.67 | 824.79 | 816.88 | 818.34 | 817.32 | 816.81 | 832.72 | 825.61 | 817.39 | 830.13 | NM | 817.80 | 817.76 | 835.51 | 829.81 | 816.07 | 816.46 | 818.61 | 817.98 | 818.91 | 819.23 | 820.83 | 818.86 | 818.80 | | |
| 3/6/2008 | 827.39 | 827.61 | 827.32 | 825.43 | 820.06 | 819.41 | 818.72 | NM | 833.35 | 826.75 | 819.32 | 831.14 | NM | NM | 819.48 | 839.11 | 830.63 | 816.76 | 817.07 | 819.59 | 818.48 | 819.50 | 819.78 | 823.98 | 819.10 | 819.38 | | |
| 4/3/2008 | 828.56 | 828.01 | 827.94 | 825.81 | 821.79 | 820.16 | 819.56 | 817.70 | 833.58 | 827.81 | 822.48 | 831.68 | NM | 818.78 | 820.99 | 835.81 | 831.04 | 816.89 | 817.27 | 819.79 | 818.64 | 819.69 | 819.97 | 824.07 | 819.12 | 819.57 | | |
| 7/31/2008 | 827.40 | 827.39 | 827.29 | 825.57 | 821.49 | 819.59 | 817.36 | 816.59 | 833.80 | 826.98 | 817.92 | 831.06 | NM | 817.85 | 818.03 | 836.53 | 830.76 | 815.83 | 816.32 | 815.85 | 817.96 | 818.43 | 818.34 | 819.30 | 818.31 | 818.40 | | |
| 12/5/2008 | 828.89 | 826.98 | 825.67 | 817.82 | 820.11 | 813.21 | 818.35 | 817.23 | 832.47 | NM | 820.61 | NM | NM | 818.12 | 818.16 | 835.30 | 829.66 | 816.57 | 816.96 | 818.66 | NM | 819.17 | 819.50 | 822.11 | NM | NM | | |
| 4/10/2012 | 826.73 | 826.91 | 825.86 | 824.62 | 818.12 | 817.99 | 818.25 | 816.11 | 832.40 | 823.37 | 817.63 | 827.61 | 831.57 | 817.31 | 818.19 | 832.78 | NM | 815.12 | NM | 819.06 | NM | 818.93 | 819.05 | 821.84 | NM | NM | | |
| 8/14/2012 | 826.47 | 826.67 | 825.41 | NM | 817.34 | NM | NM | NM | 831.80 | 821.47 | NM | 827.25 | 831.21 | 816.77 | 815.69 | NM | NM | NM | NM | NM | NM | NM | NM | NM | NM | NM | | |
| 11/14/2012 | 826.85 | 827.04 | 825.82 | 824.56 | 816.53 | 817.98 | 817.29 | 816.33 | 831.79 | 821.65 | 816.61 | 827.54 | 831.36 | 817.33 | 817.48 | 836.23 | NM | NM | NM | NM | NM | NM | NM | NM | NM | NM | | |
| 3/7/2013 | 826.77 | 826.97 | 825.47 | NM | 817.22 | NM | 817.66 | NM | 832.45 | 822.72 | 818.41 | 827.62 | 831.84 | 817.33 | 818.35 | NM | NM | NM | NM | NM | NM | NM | NM | NM | NM | NM | | |
| 7/20/2013 | 827.52 | 827.47 | 827.56 | 826.00 | 821.50 | 820.17 | 817.18 | 815.96 | 833.70 | 823.97 | 816.70 | 828.37 | 832.95 | 817.22 | 817.38 | 833.07 | NM | NM | NM | NM | NM | NM | NM | NM | NM | NM | | |
| 3/21/2014 | 827.27 | 827.32 | 826.57 | NM | 820.08 | NM | NM | NM | 832.73 | 823.17 | 820.26 | 828.62 | 833.04 | 818.12 | 819.44 | 833.33 | NM | NM | NM | NM | NM | NM | NM | NM | NM | NM | | |
| 6/2/2014 | 827.07 | 827.18 | 827.08 | 825.24 | 820.98 | 819.75 | 817.75 | 816.03 | 832.94 | 823.57 | 817.31 | 827.95 | 832.67 | 817.32 | 817.84 | 832.49 | NM | NM | NM | NM | NM | NM | NM | NM | NM | NM | | |
| 9/9/2014 | 826.70 | 826.89 | 825.70 | 824.58 | 817.36 | 818.33 | 817.13 | 815.83 | 832.46 | 822.73 | 815.61 | 827.37 | 832.34 | 817.02 | 817.04 | 831.98 | NM | NM | NM | NM | NM | NM | NM | NM | NM | NM | | |
| 12/8/2014 | 825.92 | 826.86 | 825.24 | 824.36 | 817.08 | 818.46 | 817.70 | 816.33 | 826.82 | 821.67 | 816.69 | 827.12 | 831.79 | 817.12 | 817.97 | 831.58 | NM | NM | NM | NM | NM | NM | NM | NM | NM | NM | | |
| 3/16/2015 | 826.76 | 827.07 | 825.57 | 823.38 | 819.73 | 819.91 | 818.05 | 816.71 | 832.14 | 824.25 | 817.86 | 827.46 | 832.89 | 817.45 | 819.20 | 832.08 | NM | 815.19 | NM | 819.52 | NM | 819.10 | NM | 823.74 | NM | NM | | |
| 5/19/2015 | 826.75 | 827.02 | 825.85 | 824.35 | 814.95 | 817.24 | 816.83 | 815.87 | 832.18 | 822.19 | 816.40 | 827.56 | 831.73 | 816.30 | 817.53 | 831.72 | NM | 814.92 | 814.78 | 818.86 | NM | 818.69 | NM | 821.25 | NM | NM | | |
| 6/17/2016 | 826.71 | 826.84 | 825.96 | 824.94 | 819.18 | 819.62 | 817.53 | 816.44 | 832.81 | 822.91 | 819.94 | 827.44 | 832.97 | 817.37 | 818.39 | 832.39 | Abandoned | NM | Abandoned | 818.46 | Abandoned | 818.78 | Abandoned | 821.22 | Abandoned | Abandoned | | |

**Table A.6 Groundwater
Elevations BRRTS No.
02-65-245827 Group A
Site Closure Trent Tube
Plant 1
2188 Church Street
East Troy, Wisconsin**

| Monitoring Well | MW-32D | MW-32S | MW-33 | MW-34 | MW-35 | MW-36 | MW-37R | OP-1 | OP-2 | OP-3 | OP-4 | OP-5 | OP-6 | OP-7 | OP-8 | OP-9 | OP-10 | OP-11 | OP-12 | OP-13 | OP-14 | OP-15 | OP-16 | RW-1 | RW-2 | | | | |
|--------------------------------------|--|-----------|-----------|-----------|-----------|-----------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--|--|
| 3/07 to Present | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Elevation of Ground Surface(ft amsl) | 820.57 | 820.86 | 840.86 | 833.05 | 827.32 | 826.97 | 837.60 | 836.56 | 833.55 | 830.74 | 832.80 | 831.53 | 829.86 | 828.27 | 819.61 | 836.26 | 830.33 | 837.48 | 837.82 | 837.78 | 834.90 | 834.51 | 834.99 | 833.90 | 830.23 | | | | |
| Elevation of PVC Pipe (ft amsl) | 822.88 | 823.61 | 840.61 | 832.64 | 829.87 | 829.47 | 839.48 | 839.75 | 836.88 | 831.44 | 835.73 | 833.28 | 831.32 | 832.00 | 822.70 | 838.99 | 832.81 | 839.43 | 840.15 | 840.02 | 838.07 | 838.70 | 838.19 | 832.06 | 829.40 | | | | |
| Elevation of Prototop (ft amsl) | | | | | | | | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | NP | NP | | | |
| Date measured | Depth to groundwater, feet below top of casing | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 8/15/2007 | 3.93 | 4.89 | 10.21 | NM | 9.31 | 1.94 | NM | 19.02 | 15.36 | 13.65 | 12.98 | 12.32 | 11.41 | 11.06 | 13.15 | 8.16 | 7.48 | 10.74 | 12.70 | 13.12 | 10.17 | 16.12 | 18.43 | 17.75 | 15.95 | | | | |
| 11/21/2007 | 4.26 | 5.00 | NM | NM | NM | NM | NM | 19.91 | 18.05 | 16.12 | 15.90 | 14.90 | 15.30 | 17.51 | 15.47 | 9.13 | 12.81 | 11.97 | 14.23 | 14.49 | 13.00 | 17.80 | 18.87 | 17.60 | 15.70 | | | | |
| 3/6/2008 | 4.51 | 3.69 | NM | NM | NM | NM | NM | 19.11 | 16.83 | 15.33 | 13.91 | 13.61 | 14.54 | 11.57 | 13.99 | 8.67 | 8.15 | 11.07 | 12.85 | 13.38 | 10.25 | 16.47 | 18.31 | 17.58 | 16.02 | | | | |
| 4/3/2008 | 3.55 | 4.31 | NM | NM | NM | NM | NM | 18.67 | 15.73 | 15.94 | 13.45 | 12.74 | 12.46 | 10.15 | 13.22 | 7.63 | 7.68 | 9.76 | 12.18 | 12.66 | 10.69 | 15.82 | 18.00 | 17.65 | 14.00 | | | | |
| 7/31/2008 | 4.41 | 5.35 | NM | NM | NM | NM | NM | 19.05 | 15.88 | 16.50 | 13.84 | 13.04 | 13.41 | 15.63 | 15.56 | 7.60 | 8.44 | 11.02 | 13.00 | 13.43 | 10.43 | 16.34 | 18.38 | 17.54 | 15.97 | | | | |
| 12/5/2008 | NM | NM | NM | NM | NM | NM | NM | 19.70 | 17.62 | 16.12 | 16.82 | 14.33 | 13.21 | 13.77 | 15.48 | 7.81 | 10.33 | 10.98 | 15.18 | 13.49 | 13.11 | 18.70 | 18.21 | 17.60 | 16.66 | | | | |
| 4/10/2012 | NM | NM | NM | NM | NM | NM | NM | 19.92 | 17.26 | 16.38 | 16.01 | 13.92 | 13.52 | 13.81 | 15.61 | 12.21 | 11.49 | 13.92 | 14.21 | 14.34 | 13.18 | 17.47 | 18.93 | 17.39 | 15.80 | | | | |
| 8/14/2012 | NM | NM | NM | NM | NM | NM | 9.53 | NM | NM | NM | NM | NM | NM | NM | NM | 13.05 | NM | NM | NM | NM | NM | NM | NM | NM | NM | NM | | | |
| 11/14/2012 | NM | NM | NM | NM | NM | NM | 9.28 | 19.72 | 17.76 | 16.44 | 17.15 | 18.40 | 12.65 | 15.60 | 15.04 | 13.61 | 8.62 | 17.67 | 14.23 | 14.33 | 13.56 | 17.57 | 18.71 | 17.52 | 16.03 | | | | |
| 3/7/2013 | NM | NM | NM | NM | NM | NM | 8.88 | NM | 17.26 | 16.31 | NM | NM | NM | NM | NM | 13.47 | NM | NM | NM | NM | NM | NM | NM | NM | NM | NM | NM | | |
| 7/20/2013 | NM | NM | NM | NM | NM | NM | 7.77 | NM | NM | 16.45 | NM | NM | NM | NM | NM | 11.67 | NM | 14.21 | NM | NM | NM | NM | NM | NM | NM | 17.45 | 15.85 | | |
| 3/21/2014 | NM | NM | NM | NM | NM | NM | NM | NM | 16.60 | 15.20 | NM | NM | NM | NM | NM | 13.25 | NM | NM | NM | NM | NM | NM | NM | NM | NM | 17.60 | 16.00 | | |
| 6/2/2014 | NM | NM | NM | NM | NM | NM | 7.50 | NM | 16.60 | 16.25 | NM | NM | NM | NM | NM | 12.14 | NM | 14.13 | NM | NM | NM | NM | NM | NM | NM | 17.59 | 15.86 | | |
| 9/9/2014 | NM | NM | NM | NM | NM | NM | 7.03 | 19.85 | 18.40 | 16.65 | 16.35 | 14.41 | Dry | 15.50 | 14.10 | 12.72 | 8.52 | 14.55 | 14.65 | 14.56 | 14.60 | 17.30 | 19.80 | 17.05 | 15.87 | | | | |
| 12/8/2014 | NM | NM | NM | NM | NM | NM | 8.48 | 20.07 | 18.44 | 16.70 | 16.90 | 14.79 | Dry | 14.70 | 13.40 | 13.46 | 8.56 | 15.90 | 15.00 | 14.76 | 14.63 | 17.60 | 18.88 | 17.49 | 15.86 | | | | |
| 3/16/2015 | NM | NM | NM | NM | NM | NM | 7.70 | 19.91 | 18.00 | 16.45 | 15.80 | 13.70 | 11.67 | 12.05 | 14.07 | 13.08 | 7.61 | 17.75 | 14.82 | 14.59 | 14.45 | 17.50 | 18.70 | 17.23 | 15.35 | | | | |
| 5/19/2015 | NM | NM | NM | NM | NM | NM | 8.94 | 20.18 | 18.14 | 16.48 | 18.99 | 16.79 | Dry | 15.83 | 15.56 | 13.32 | 9.54 | 15.07 | 14.77 | 14.52 | 14.67 | 17.69 | 19.07 | 17.40 | 15.93 | | | | |
| 6/17/2016 | Abandoned | Abandoned | Abandoned | Abandoned | Abandoned | Abandoned | 6.90 | 19.42 | 17.35 | 15.46 | 16.37 | 13.67 | 11.29 | 12.31 | 13.92 | 12.71 | 8.06 | 14.35 | Dry | 14.14 | 12.25 | 16.30 | 18.39 | 11.82 | 11.15 | | | | |
| Groundwater elevation (ft amsl) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 8/15/2007 | 818.95 | 818.72 | 830.40 | NM | 820.56 | 827.53 | NM | 820.73 | 821.52 | 817.79 | 822.75 | 820.96 | 819.91 | 820.94 | 809.55 | 827.02 | 825.33 | 826.08 | 827.31 | 826.91 | 827.90 | 822.58 | 819.76 | 814.31 | 813.45 | | | | |
| 11/21/2007 | 818.62 | 818.61 | NM | NM | NM | NM | NM | 819.84 | 818.83 | 815.32 | 819.83 | 818.38 | 816.02 | 814.49 | 807.23 | 829.86 | 820.00 | 827.46 | 825.92 | 825.53 | 825.07 | 820.90 | 819.32 | 814.46 | 813.70 | | | | |
| 3/6/2008 | 818.37 | 819.92 | NM | NM | NM | NM | NM | 820.64 | 820.05 | 816.11 | 821.82 | 819.67 | 816.78 | 820.43 | 808.71 | 830.32 | 824.66 | 828.36 | 827.30 | 826.64 | 827.82 | 822.23 | 819.88 | 814.48 | 813.38 | | | | |
| 4/3/2008 | 819.33 | 819.30 | NM | NM | NM | NM | NM | 821.08 | 821.15 | 815.50 | 822.28 | 820.54 | 818.86 | 821.85 | 809.48 | 831.36 | 825.13 | 829.67 | 827.97 | 827.36 | 827.38 | 822.88 | 820.19 | 814.41 | 815.40 | | | | |
| 7/31/2008 | 818.47 | 818.26 | NM | NM | NM | NM | NM | 820.70 | 821.00 | 814.94 | 821.89 | 820.24 | 817.91 | 816.37 | 807.14 | 831.39 | 824.37 | 828.41 | 827.15 | 826.59 | 827.64 | 822.36 | 819.81 | 814.52 | 813.43 | | | | |
| 12/5/2008 | NM | NM | NM | NM | NM | NM | NM | 820.05 | 819.26 | 815.32 | 818.91 | 818.95 | 818.11 | 818.23 | 807.22 | 831.18 | 822.48 | 828.45 | 824.97 | 826.53 | 824.96 | 820.00 | 819.98 | 814.46 | 812.74 | | | | |
| 4/10/2012 | NM | NM | NM | NM | NM | NM | NM | 819.83 | 819.62 | 815.06 | 819.72 | 819.36 | 817.80 | 818.19 | 807.09 | 826.78 | 821.32 | 825.51 | 825.94 | 825.68 | 824.89 | 821.23 | 819.26 | 814.67 | 813.60 | | | | |
| 8/14/2012 | NM | NM | NM | NM | NM | NM | 829.95 | NM | NM | NM | NM | NM | NM | NM | NM | 825.94 | NM | NM | NM | NM | NM | NM | NM | NM | NM | NM | | | |
| 11/14/2012 | NM | NM | NM | NM | NM | NM | 830.20 | 820.03 | 819.12 | 815.00 | 818.58 | 814.88 | 818.67 | 816.40 | 807.66 | 825.38 | 824.19 | 821.76 | 825.92 | 825.69 | 824.51 | 821.13 | 819.48 | 814.54 | 813.37 | | | | |
| 3/7/2013 | NM | NM | NM | NM | NM | NM | 830.60 | NM | 819.62 | 815.13 | NM | NM | NM | NM | NM | 825.52 | NM | NM | NM | NM | NM | NM | NM | NM | NM | NM | | | |
| 7/20/2013 | NM | NM | NM | NM | NM | NM | 831.71 | NM | NM | 814.99 | NM | NM | NM | NM | NM | 827.32 | NM | 825.22 | NM | NM | NM | NM | NM | NM | NM | 814.61 | 813.55 | | |
| 3/21/2014 | NM | NM | NM | NM | NM | NM | NM | NM | 820.28 | 816.24 | NM | NM | NM | NM | NM | 825.74 | NM | NM | NM | NM | NM | NM | NM | NM | NM | 814.46 | 813.40 | | |
| 6/2/2014 | NM | NM | NM | NM | NM | NM | 831.98 | NM | 820.28 | 815.19 | NM | NM | NM | NM | NM | 826.85 | NM | 825.30 | NM | NM | NM | NM | NM | NM | NM | 814.47 | 813.54 | | |
| 9/9/2014 | NM | NM | NM | NM | NM | NM | 832.45 | 819.90 | 818.48 | 814.79 | 819.38 | 818.87 | DRY | 816.50 | 808.60 | 826.27 | 824.29 | 824.88 | 825.50 | 825.46 | 823.47 | 821.40 | 818.39 | 815.01 | 813.53 | | | | |
| 12/8/2014 | NM | NM | NM | NM | NM | NM | 831.00 | 819.68 | 818.44 | 819.74 | 818.83 | 818.49 | DRY | 817.30 | 809.30 | 825.23 | 824.25 | 823.47 | 825.15 | 825.26 | 823.44 | 821.10 | 819.31 | 814.57 | 813.54 | | | | |
| 3/16/2015 | NM | NM | NM | NM | NM | NM | 831.78 | 819.84 | 818.88 | 814.99 | 819.93 | 819.58 | 819.65 | 819.95 | 808.63 | 825.91 | 825.20 | 821.68 | 825.33 | 825.43 | 823.62 | 821.20 | 819.49 | 814.83 | 814.05 | | | | |
| 5/19/2015 | NM | NM | NM | NM | NM | NM | 830.54 | 819.57 | 818.74 | 814.96 | 816.74 | 816.49 | Dry | 816.17 | 807.14 | 825.67 | 823.27 | 824.36 | 825.38 | 825.50 | 823.40 | 821.01 | 819.12 | 814.66 | 813.47 | | | | |
| 6/17/2016 | Abandoned | Abandoned | Abandoned | Abandoned | Abandoned | Abandoned | 832.58 | 820.33 | 819.53 | 815.98 | 819.36 | 819.61 | 820.03 | 819.69 | 808.78 | 826.28 | 824.75 | 825.08 | Dry | 825.88 | 825.82 | 822.40 | 819.80 | 820.24 | 818.25 | | | | |

**Table A.6 Groundwater
Elevations BRRTS No.
02-65-245827 Group A
Site Closure Trent Tube
Plant 1
2188 Church Street
East Troy, Wisconsin**

| Monitoring Well | RW-3 | RW-4 | RW-5 | RW-6 | RW-7 | RW-8 | RW-10 | RW-11 | RW-12 | RW-13 | RW-14 | RW-15 | RW-16 | RW-17 | RW-18 | RW-19 | RW-20 | RW-21 | RW-22 | RW-23 | RW-24 | RW-25 | RW-26 | RW-27 | RW-28 | |
|--------------------------------------|--|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|----|
| 3/07 to Present | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Elevation of Ground Surface(ft amsl) | 831.4 | 831.81 | 832.21 | 831.75 | 830.20 | 836.90 | 830.05 | 829.67 | 829.93 | 830.12 | 830.08 | 829.42 | 835.09 | 836.19 | 836.03 | 836.37 | 835.53 | 834.80 | 832.75 | 830.85 | 831.56 | 832.85 | 830.24 | 828.70 | 830.07 | |
| Elevation of PVC Pipe (ft amsl) | 830.52 | 830.60 | 830.33 | 829.83 | 828.11 | 840.58 | 828.95 | 828.36 | 828.18 | 828.83 | 828.70 | 828.10 | 833.92 | 834.79 | 834.77 | 835.10 | 834.26 | 833.35 | 832.68 | 830.17 | 830.59 | 831.18 | 822.20 | 827.23 | 828.90 | |
| Elevation of Protop (ft amsl) | NP | NP | NP | NP | NP | NP | NP | NP | NP | NP | NP | NP | NP | NP | NP | NP | NP | NP | NP | NP | NP | NP | NP | NP | NP | NP |
| Date measured | Depth to groundwater, feet below top of casing | | | | | | | | | | | | | | | | | | | | | | | | | |
| 8/15/2007 | 13.92 | 14.54 | 9.65 | 15.92 | 15.11 | 7.53 | 15.75 | 15.95 | 14.54 | 15.62 | 15.10 | 13.84 | 20.78 | 19.82 | 19.85 | 21.20 | 20.15 | 16.41 | 17.71 | 12.44 | 13.38 | 12.81 | 10.25 | 13.09 | 10.85 | |
| 11/21/2007 | 16.43 | 14.53 | 17.69 | 14.43 | 14.56 | 9.02 | 15.53 | 15.33 | 14.47 | 15.82 | 14.77 | 14.04 | 20.60 | 19.80 | 19.90 | 21.00 | 20.20 | 16.30 | 18.00 | 14.80 | 14.78 | 17.74 | 13.00 | 14.07 | 16.75 | |
| 3/6/2008 | 16.38 | 14.61 | 17.62 | 16.24 | 14.57 | 7.63 | 15.74 | 15.31 | 14.51 | 15.64 | 15.28 | 14.11 | 20.78 | 17.48 | 20.36 | 21.31 | 19.81 | 16.53 | 17.68 | 16.85 | 13.91 | 14.99 | 13.21 | 13.32 | 16.67 | |
| 4/3/2008 | 16.30 | 14.55 | 17.20 | 15.70 | 14.21 | 7.36 | 15.91 | 15.57 | 14.63 | 15.76 | 15.41 | 14.11 | 21.00 | 19.86 | 20.40 | 21.25 | 20.20 | 16.50 | 17.80 | 16.80 | 15.70 | 15.20 | 12.70 | 12.11 | 16.53 | |
| 7/31/2008 | 16.61 | 14.44 | 18.05 | 16.17 | 14.53 | 7.98 | 15.61 | 15.27 | 14.46 | 15.64 | 15.34 | 14.18 | 19.80 | 19.41 | 20.31 | 21.33 | 20.24 | 16.39 | 17.68 | 16.73 | 15.66 | 14.35 | 13.26 | 14.17 | 16.58 | |
| 12/5/2008 | 16.80 | 14.50 | 18.00 | 15.73 | 14.51 | NM | 15.68 | 6.85 | 9.87 | 15.71 | 8.34 | 14.16 | 21.65 | 13.00 | 20.33 | 22.15 | 20.10 | 16.31 | 17.75 | 16.75 | 15.80 | 11.60 | 10.08 | 11.65 | 16.68 | |
| 4/10/2012 | 14.40 | 14.60 | 16.21 | 15.61 | 13.84 | 12.87 | 16.12 | 15.91 | 14.01 | 15.90 | 15.10 | 14.22 | 21.00 | 19.98 | 20.38 | 20.90 | 20.61 | 15.80 | 17.62 | 17.75 | 15.61 | 14.33 | 9.08 | 12.22 | 15.89 | |
| 8/14/2012 | NM | NM | NM | NM | NM | NM | NM | NM | NM | NM | NM | NM | NM | NM | NM | NM | NM | NM | NM | NM | NM | NM | NM | NM | NM | NM |
| 11/14/2012 | 16.47 | 14.61 | 17.93 | 14.89 | 13.06 | NM | 15.71 | 15.11 | 14.10 | 10.72 | 15.45 | 14.11 | 20.97 | 19.92 | 20.43 | 21.12 | 20.25 | 16.50 | 17.87 | 14.23 | 15.69 | 16.91 | 15.80 | 10.48 | 16.55 | |
| 3/7/2013 | NM | NM | NM | NM | NM | NM | NM | NM | NM | NM | NM | NM | NM | NM | NM | NM | NM | NM | NM | NM | NM | NM | NM | NM | NM | NM |
| 7/20/2013 | 16.85 | 14.45 | 10.70 | 10.24 | 14.11 | 12.06 | 15.44 | 15.20 | 14.30 | 15.77 | 15.43 | 13.87 | 20.80 | 10.29 | 10.80 | 21.15 | 13.70 | 16.34 | 17.83 | 16.80 | 15.75 | 14.70 | 10.22 | 11.04 | 11.29 | |
| 3/21/2014 | 16.40 | 14.55 | 17.40 | NM | 14.45 | NM | 15.61 | 15.39 | 14.20 | 15.73 | 15.20 | 13.95 | 20.90 | 19.92 | 20.50 | 21.20 | 20.35 | 16.37 | 17.75 | 16.72 | 14.30 | 15.83 | 11.50 | 11.75 | 15.30 | |
| 6/2/2014 | 16.46 | 14.45 | 17.44 | 15.64 | 14.40 | 15.90 | 16.37 | 15.41 | 14.17 | 15.68 | 15.37 | 14.03 | 20.79 | 19.85 | 20.45 | 21.12 | 20.33 | 16.50 | 17.83 | 16.73 | 15.83 | 16.09 | 12.80 | 12.48 | 15.70 | |
| 9/9/2014 | 16.15 | 14.41 | 17.05 | 14.94 | 13.69 | 13.10 | 15.49 | 14.07 | 14.11 | 15.48 | 15.14 | 13.76 | 21.83 | 19.51 | 21.39 | 21.29 | 20.15 | 16.29 | 17.83 | 16.54 | 15.65 | 16.77 | 15.57 | 12.86 | 13.00 | |
| 12/8/2014 | 16.56 | 14.46 | 11.10 | 16.24 | 14.53 | 13.31 | 16.22 | 15.30 | 14.10 | 15.63 | 15.29 | 13.38 | 20.97 | 19.55 | 20.36 | 20.97 | 19.44 | 16.34 | 17.50 | 16.69 | 15.73 | 17.80 | 15.82 | 12.47 | 15.44 | |
| 3/16/2015 | 16.45 | 14.62 | 18.17 | 15.65 | 14.14 | 13.00 | 15.71 | 15.10 | 14.38 | 15.55 | 15.35 | 13.85 | 20.89 | 19.57 | 20.48 | 17.84 | 20.32 | 17.39 | 17.77 | 16.61 | 15.69 | 13.89 | 12.35 | 10.85 | 16.52 | |
| 5/19/2015 | 16.46 | 14.42 | 16.61 | 15.89 | 14.08 | 12.94 | 15.63 | 15.04 | 14.25 | 15.65 | 15.24 | 13.79 | 20.70 | 19.75 | 20.38 | 19.15 | 20.21 | 17.51 | 17.65 | 13.20 | 15.63 | 16.54 | 15.79 | 11.65 | 16.52 | |
| 6/17/2015 | 14.45 | 13.35 | 10.98 | 10.89 | 10.28 | 13.03 | 10.25 | 8.64 | 9.05 | 10.08 | 9.19 | 5.90 | 10.55 | 10.45 | 11.37 | 14.98 | 14.10 | 13.45 | 14.08 | 12.51 | 14.55 | 11.85 | 10.55 | 9.74 | 11.35 | |
| Groundwater elevation (ft amsl) | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 8/15/2007 | 816.60 | 816.06 | 820.68 | 813.91 | 813.00 | 828.96 | 813.20 | 812.41 | 813.64 | 813.21 | 813.60 | 814.26 | 813.14 | 814.97 | 814.92 | 813.90 | 814.11 | 816.94 | 814.97 | 817.73 | 817.21 | 818.37 | 811.95 | 814.14 | 818.05 | |
| 11/21/2007 | 814.09 | 816.07 | 812.64 | 815.40 | 813.55 | 831.56 | 813.42 | 813.03 | 813.71 | 813.01 | 813.93 | 814.06 | 813.32 | 814.99 | 814.87 | 814.10 | 814.06 | 817.05 | 814.68 | 815.37 | 815.81 | 813.44 | 809.20 | 813.16 | 812.15 | |
| 3/6/2008 | 814.14 | 815.99 | 812.71 | 813.59 | 813.54 | 832.95 | 813.21 | 813.05 | 813.67 | 813.19 | 813.42 | 813.99 | 813.14 | 817.31 | 814.41 | 813.79 | 814.45 | 816.82 | 815.00 | 813.32 | 816.68 | 816.19 | 808.99 | 813.91 | 812.23 | |
| 4/3/2008 | 814.22 | 816.05 | 813.13 | 814.13 | 813.90 | 833.22 | 813.04 | 812.79 | 813.55 | 813.07 | 813.29 | 813.99 | 812.92 | NM | 814.37 | 813.85 | 814.06 | 816.85 | 814.88 | 813.37 | 814.89 | 815.98 | 809.50 | 815.12 | 812.37 | |
| 7/31/2008 | 813.91 | 816.16 | 812.28 | 813.66 | 813.58 | 832.60 | 813.34 | 813.09 | 813.72 | 813.19 | 813.36 | 813.92 | 814.12 | 815.38 | 814.46 | 813.77 | 814.02 | 816.96 | 815.00 | 813.44 | 814.93 | 816.83 | 808.94 | 813.06 | 812.32 | |
| 12/5/2008 | 813.72 | 816.10 | 812.33 | 814.10 | 813.60 | NM | 813.27 | 821.51 | 818.31 | 813.12 | 820.36 | 813.94 | 812.27 | 821.79 | 814.44 | 812.95 | 814.16 | 817.04 | 814.93 | 813.42 | 814.79 | 819.58 | 812.12 | 815.58 | 812.22 | |
| 4/10/2012 | 816.12 | 816.00 | 814.12 | 814.22 | 814.27 | 827.71 | 812.83 | 812.45 | 814.17 | 812.93 | 813.60 | 813.88 | 812.92 | 814.81 | 814.39 | 814.20 | 813.65 | 817.55 | 815.06 | 812.42 | 814.98 | 816.85 | 813.12 | 815.01 | 813.01 | |
| 8/14/2012 | NM | NM | NM | NM | NM | NM | NM | NM | NM | NM | NM | NM | NM | NM | NM | NM | NM | NM | NM | NM | NM | NM | NM | NM | NM | NM |
| 11/14/2012 | 814.05 | 815.99 | 812.40 | 814.94 | 815.05 | NM | 813.24 | 813.25 | 814.08 | 818.11 | 813.25 | 813.99 | 812.95 | 814.87 | 814.34 | 813.98 | 814.01 | 816.85 | 814.81 | 815.94 | 814.90 | 814.27 | 806.40 | 816.75 | 812.35 | |
| 3/7/2013 | NM | NM | NM | NM | NM | NM | NM | NM | NM | NM | NM | NM | NM | NM | NM | NM | NM | NM | NM | NM | NM | NM | NM | NM | NM | NM |
| 7/20/2013 | 813.67 | 816.15 | 819.63 | 819.59 | 814.00 | 828.52 | 813.51 | 813.16 | 813.88 | 813.06 | 813.27 | 814.23 | 813.12 | 824.50 | 823.97 | 813.95 | 820.56 | 817.01 | 814.85 | 813.37 | 814.84 | 816.48 | 811.98 | 816.19 | 817.61 | |
| 3/21/2014 | 814.12 | 816.05 | 812.93 | NM | 813.66 | NM | 813.34 | 812.97 | 813.98 | 813.10 | 813.50 | 814.15 | 813.02 | 814.87 | 814.27 | 813.90 | 813.91 | 816.98 | 814.93 | 813.45 | 816.29 | 815.35 | 810.70 | 815.48 | 813.60 | |
| 6/2/2014 | 814.06 | 816.15 | 812.89 | 814.19 | 813.71 | 824.68 | 812.58 | 812.95 | 814.01 | 813.15 | 813.33 | 814.07 | 813.13 | 814.94 | 814.32 | 813.98 | 813.93 | 816.85 | 814.85 | 813.44 | 814.76 | 815.09 | 809.40 | 814.75 | 813.20 | |
| 9/9/2014 | 814.37 | 816.19 | 813.28 | 814.89 | 814.42 | 827.48 | 813.46 | 814.29 | 814.07 | 813.35 | 813.56 | 814.34 | 812.09 | 815.28 | 813.38 | 813.81 | 814.11 | 817.06 | 814.85 | 813.63 | 814.94 | 814.41 | 806.63 | 814.37 | 815.90 | |
| 12/8/2014 | 813.96 | 816.14 | 819.23 | 813.59 | 813.58 | 827.27 | 812.73 | 813.06 | 814.08 | 813.20 | 813.41 | 814.72 | 812.95 | 815.24 | 814.41 | 814.13 | 814.82 | 817.01 | 815.18 | 813.48 | 814.86 | 813.38 | 806.38 | 814.76 | 813.46 | |
| 3/16/2015 | 814.07 | 815.98 | 812.16 | 814.18 | 813.97 | 827.58 | 813.24 | 813.26 | 813.80 | 813.28 | 813.35 | 814.25 | 813.03 | 815.22 | 814.29 | 817.26 | 813.94 | 815.96 | 814.91 | 813.56 | 814.90 | 817.29 | 809.85 | 816.38 | 812.38 | |
| 5/19/2015 | 814.06 | 816.18 | 813.72 | 813.94 | 814.03 | 827.64 | 813.32 | 813.32 | 813.93 | 813.18 | 813.46 | 814.31 | 813.22 | 815.04 | 814.39 | 815.95 | 814.05 | 815.84 | 815.03 | 816.97 | 814.96 | 814.64 | 806.41 | 815.58 | 812.38 | |
| 6/17/2015 | 86.07 | 817.25 | 819.35 | 818.94 | 817.83 | 827.55 | 818.70 | 819.72 | 819.13 | 818.75 | 819.51 | 822.20 | 823.37 | 824.34 | 823.40 | 820.12 | 820.16 | 819.90 | 818.60 | 817.66 | 816.04 | 819.33 | 811.65 | 817.49 | 817.55 | |

Attachment B

Maps, Figures and Photos

BRRTS No. 02-65-245827

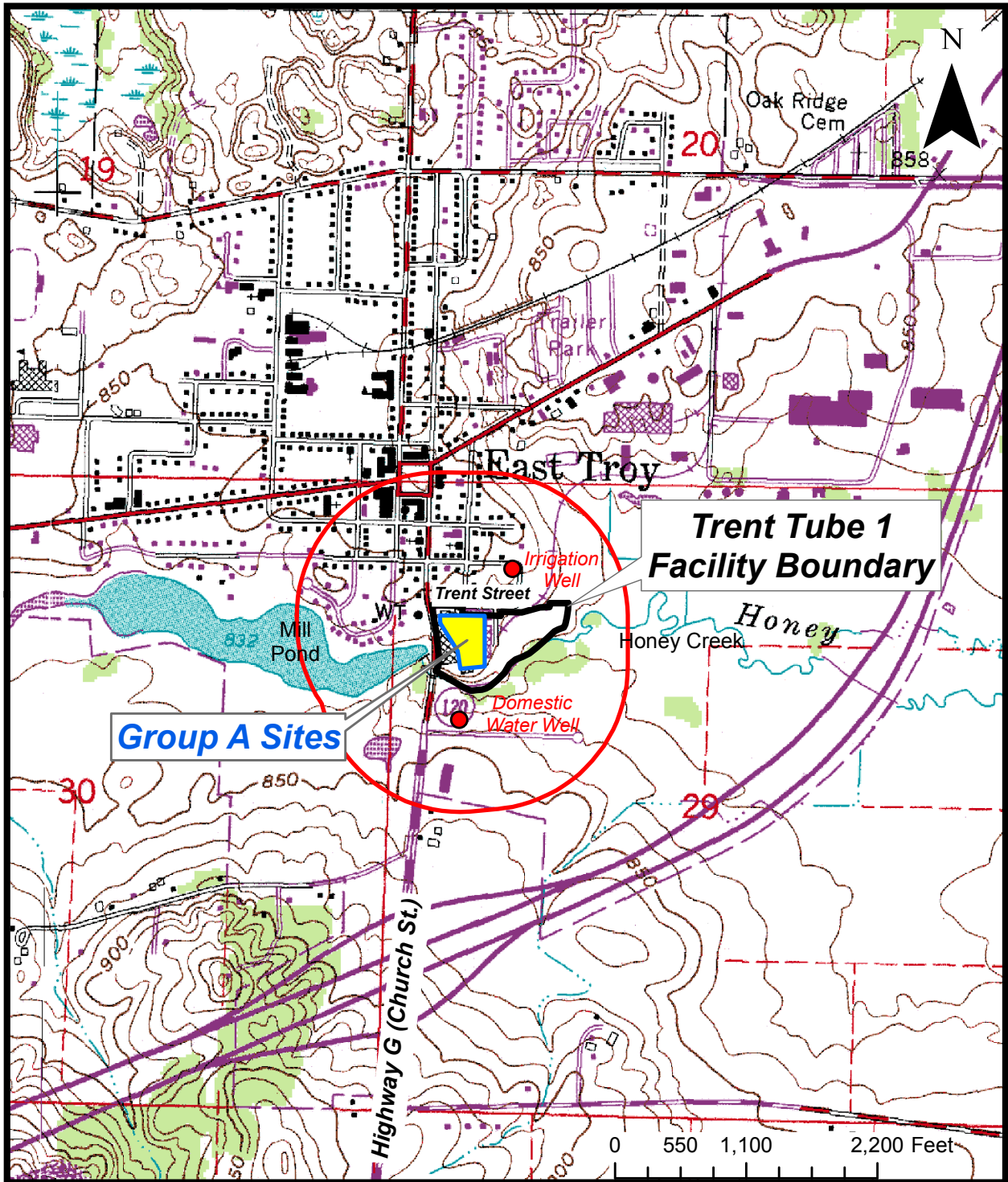
Group A Site Closure

Trent Tube Plant 1

2188 Church Street

East Troy, Wisconsin

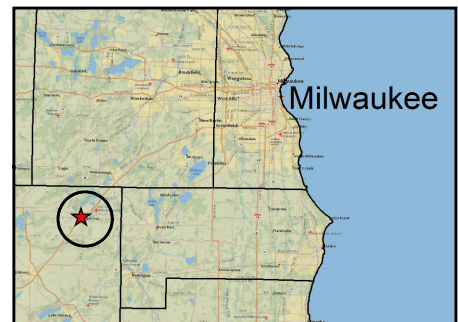
| Table of Contents | |
|--------------------------------------|----------------|
| Closure Form Title | Applicability |
| B.1.a. Location Map | Applicable |
| B.1.b. Detailed Site Map | Applicable |
| B.1.c. RR Sites Map | Applicable |
| B.2.a. Soil Contamination | Applicable |
| B.2.b. Residual Soil Contamination | Applicable |
| B.3.a. Geologic Cross-Section Figure | Applicable |
| B.3.b. Groundwater Isoconcentration | Applicable |
| B.3.c. Groundwater Flow Direction | Applicable |
| B.3.d. Monitoring Wells | Applicable |
| B.4.a. Vapor Intrusion Map | Not Applicable |
| B.4.b. Other Media of Concern | Not Applicable |
| B.4.c. Other | Not Applicable |



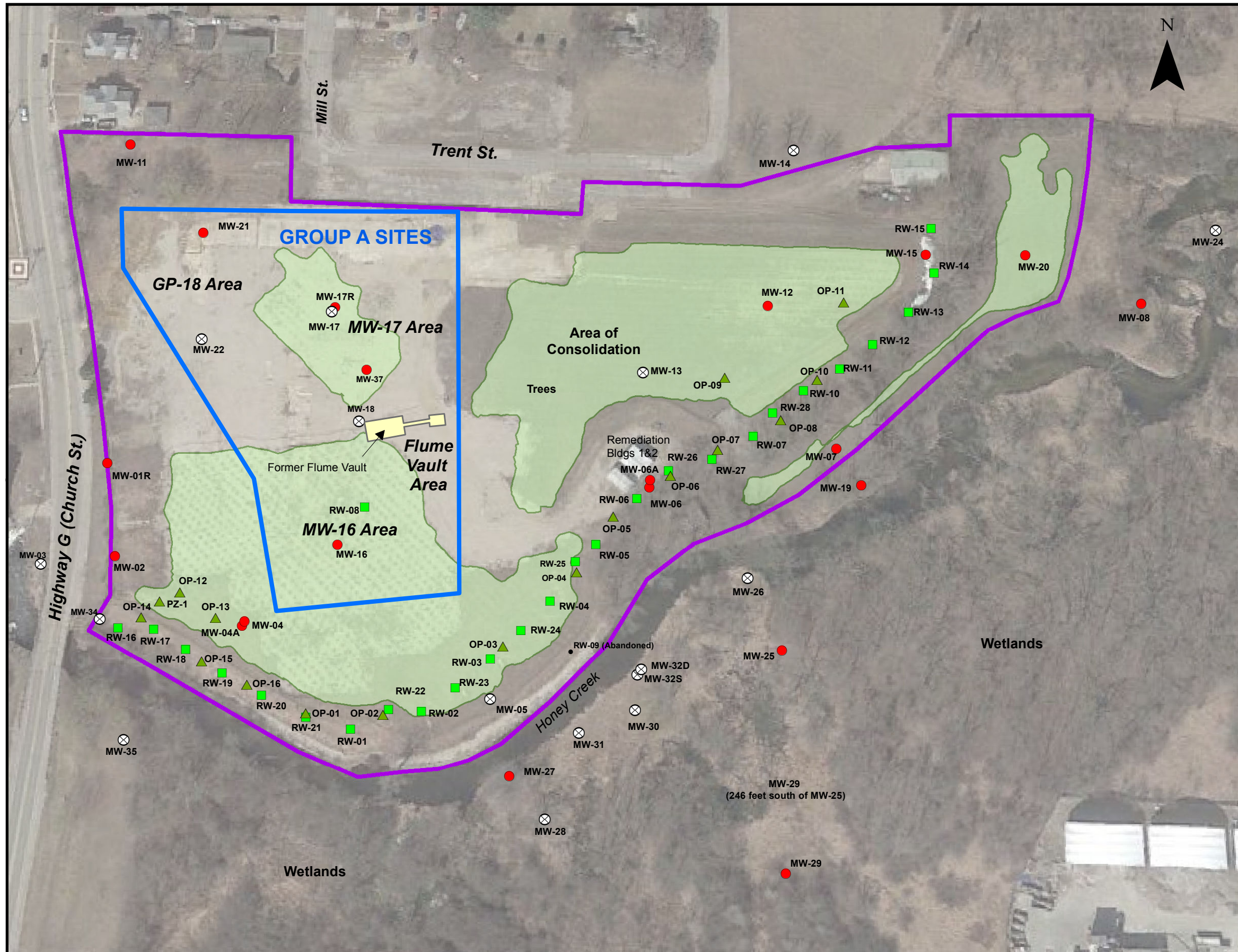
Base Map: USGS 1:24K Topographic Map, East Troy Quadrangle
 W2NW Section 29, T4N R18E, Walworth County, WI

Legend

- Group A Site Boundary
- 1200-Foot Water Well Buffer
- Water Well

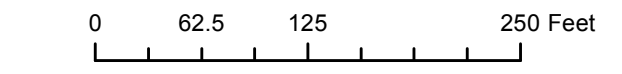


**FIGURE B.1.a - SITE LOCATION MAP-GROUP A
 FORMER TRENT TUBE PLANT 1 - GROUP A SITES**



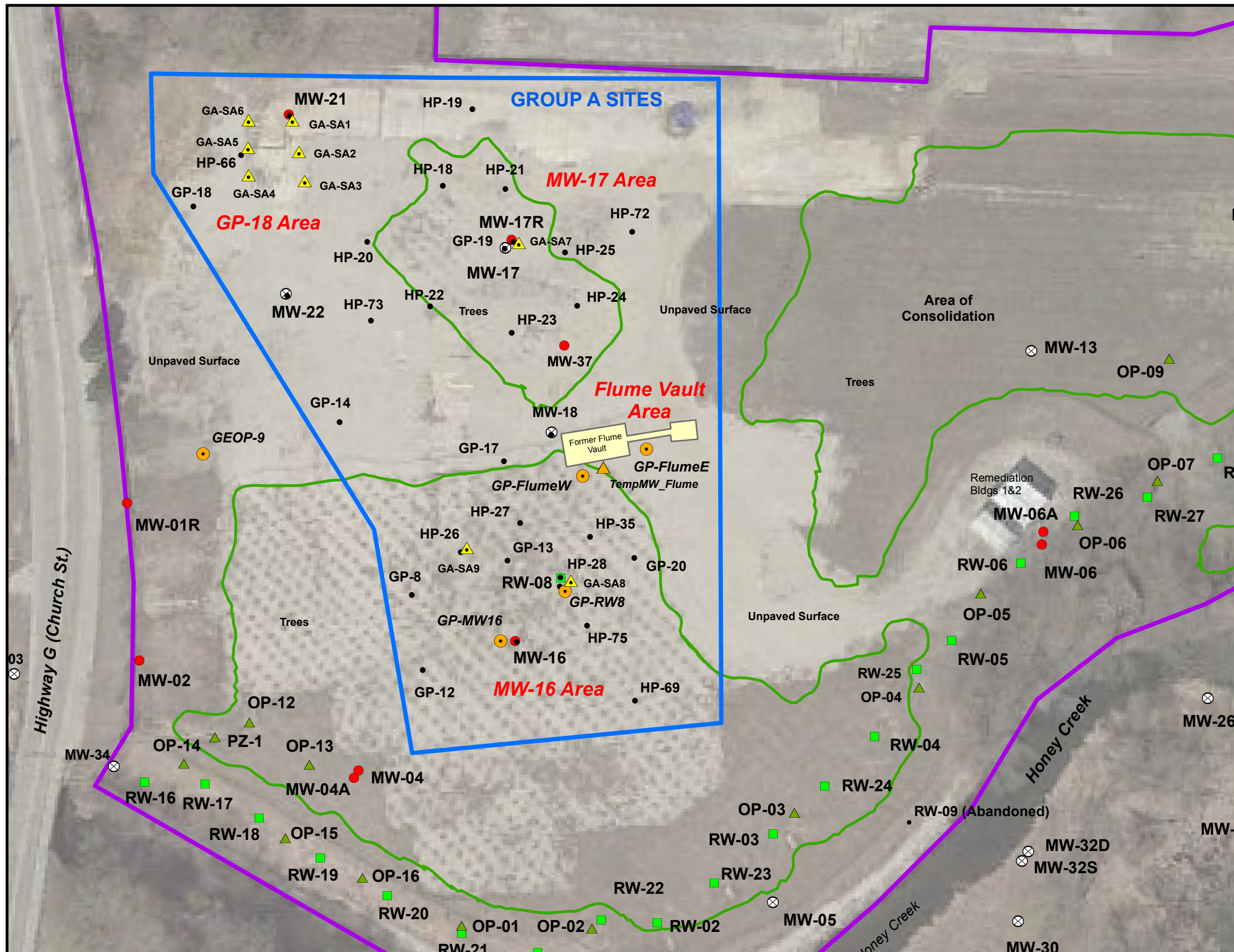
Note: Group A Sites are located within the larger Trent Tube Plant 1 Facility. The Facility is under active remediation with several recovery wells and an extensive phytoremediation system onsite.

- Legend
- Phytoremediation Areas
 - Monitoring Well
 - ⊗ Abandoned MW
 - Recovery Well
 - Observation Probe
 - Geoprobe Sample Location (2016)
 - Temporary Monitoring Well
 - Historic Soil and/or Groundwater Sample Location
 - Trent Tube 1 Boundary

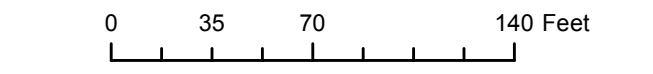


**FIGURE B.1.b-1
SITE MAP-GROUP A
FORMER TRENT TUBE PLANT 1**

Base Map: Aerial Photo, April 4, 2014, Google Earth

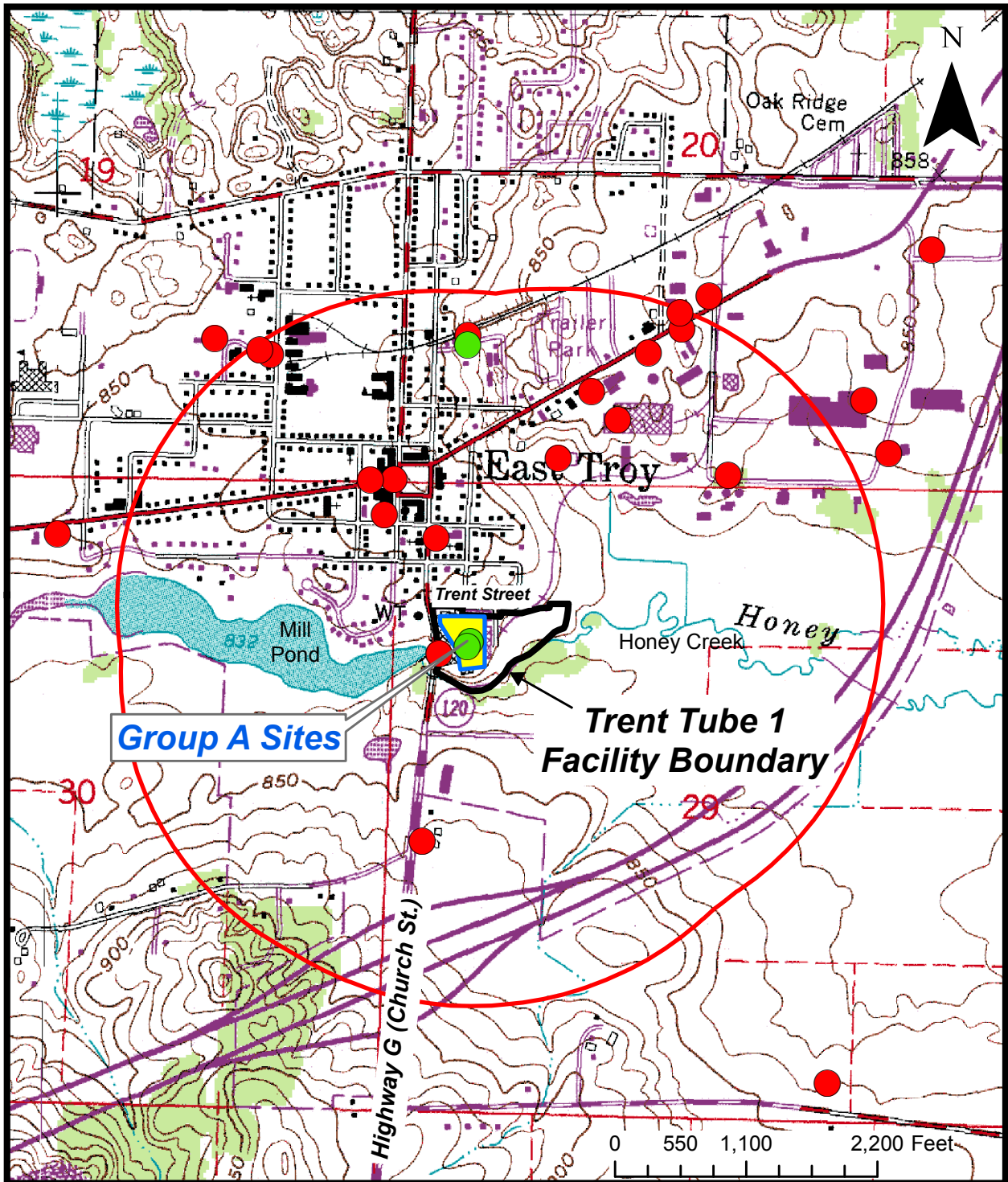


- Legend
- Phytoremediation Areas
 - Monitoring Well
 - Abandoned MW
 - Recovery Well
 - Observation Probe
 - Geoprobe Sample Location (2016)
 - Temporary Monitoring Well
 - Historic Soil and/or Groundwater Sample Location
 - Shallow Soil Sample Location (November 10, 2016)
 - Trent Tube 1 Property Boundary



**FIGURE B.1.b-2
DETAILED SITE MAP-GROUP A
FORMER TRENT TUBE PLANT 1**

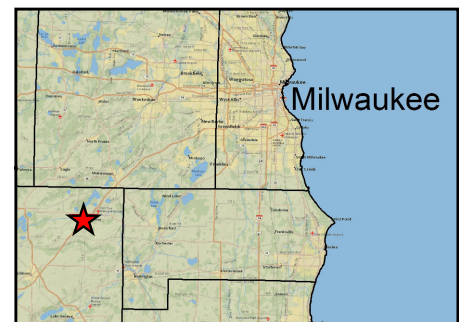
Base Map: Aerial Photo, April 4, 2014, Google Earth



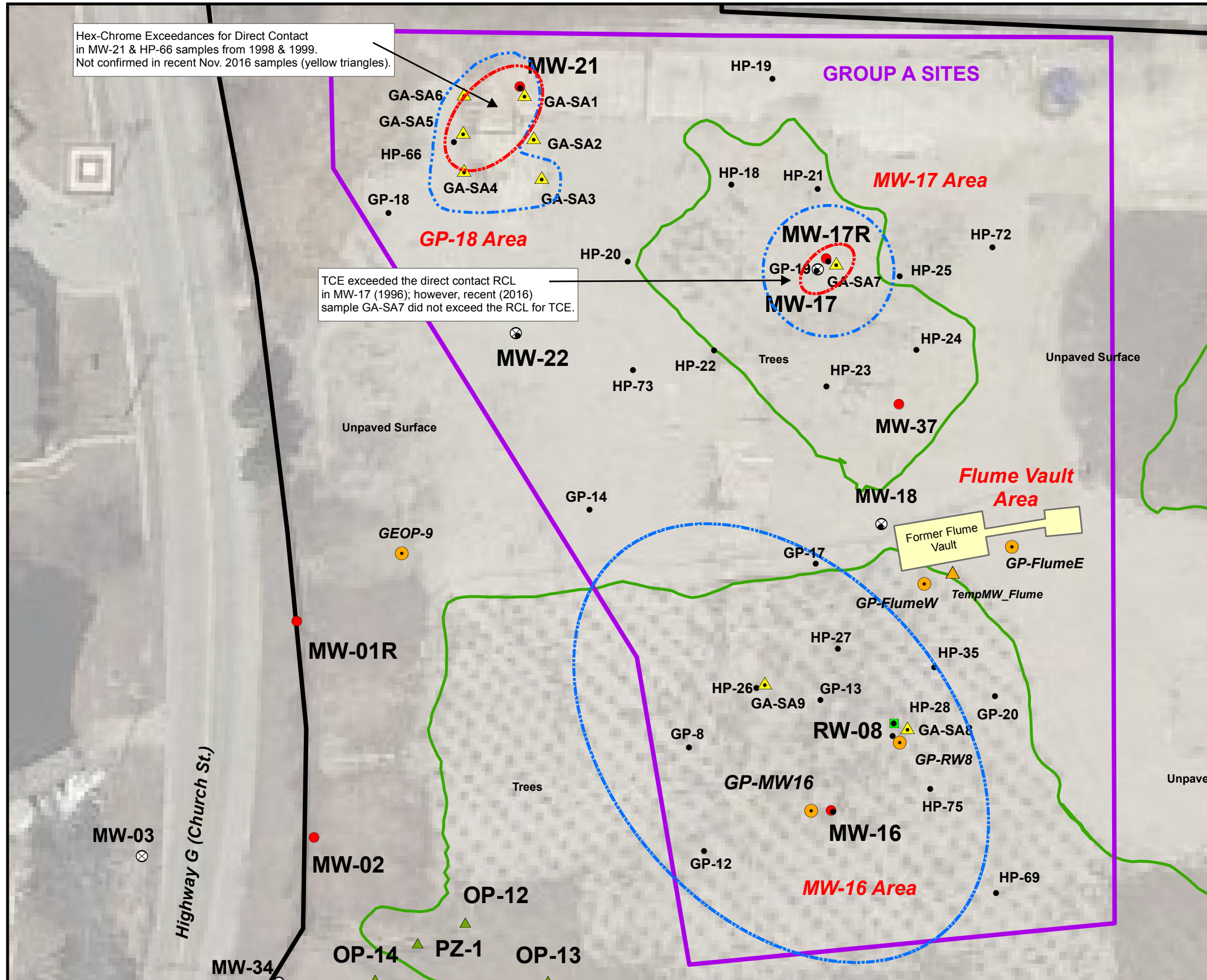
Base Map: USGS 1:24K Topographic Map, East Troy Quadrangle
 W2NW Section 29, T4N R18E, Walworth County, WI

Legend

- Group A Site Boundary
- Closed BRRTS Sites
- Open BRRTS Sites
- 1/2 Mile Radius



**FIGURE B.1.c - RR SITES MAP
 FORMER TRENT TUBE PLANT 1 - GROUP A SITES**



Hex-Chrome Exceedances for Direct Contact in MW-21 & HP-66 samples from 1998 & 1999. Not confirmed in recent Nov. 2016 samples (yellow triangles).

TCE exceeded the direct contact RCL in MW-17 (1996); however, recent (2016) sample GA-SA7 did not exceed the RCL for TCE.

Legend

- Phytoremediation Areas
- Monitoring Well
- Abandoned MW
- Recovery Well
- Observation Probe
- Geoprobe Sample Location (2016)
- Temporary Monitoring Well
- Historic Soil and/or Groundwater Sample Location
- Shallow Soil Sample Location (November 10, 2016)
- Direct Contact Soil RCL Exceeded in MW-21 and HP-66 for CR+6 (1998/1999) & in MW-17 for TCE (1996).
- Soil to Groundwater RCLs Exceeded (TCE, 1,1,1-TCA, Nickel, Selenium)
- Group A Study Area

Note: Arsenic concentrations exceeded the direct contact and groundwater to soil RCLs in several samples ranging between 1100 and 8940 micrograms/kg; however, these concentrations are believed to represent background levels (see text).

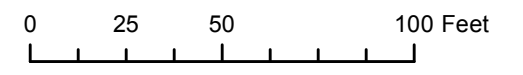
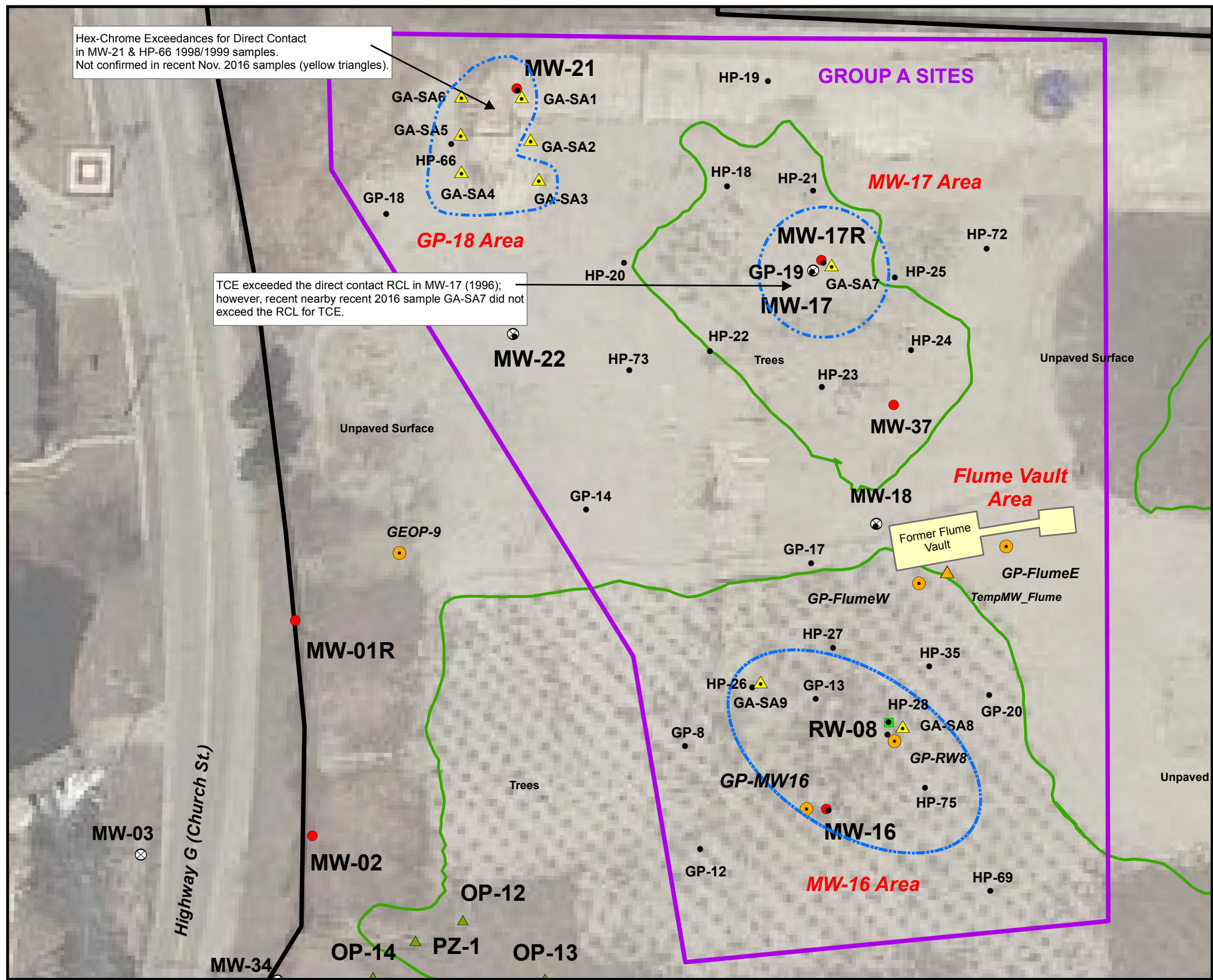


FIGURE B.2.a
ALL HISTORIC SOIL CONTAMINATION
FORMER TRENT TUBE PLANT 1

Base Map: Aerial Photo, April 4, 2014, Google Earth



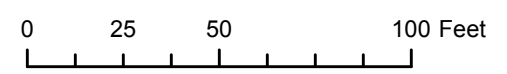
Hex-Chrome Exceedances for Direct Contact in MW-21 & HP-66 1998/1999 samples. Not confirmed in recent Nov. 2016 samples (yellow triangles).

TCE exceeded the direct contact RCL in MW-17 (1996); however, recent nearby recent 2016 sample GA-SA7 did not exceed the RCL for TCE.

Legend

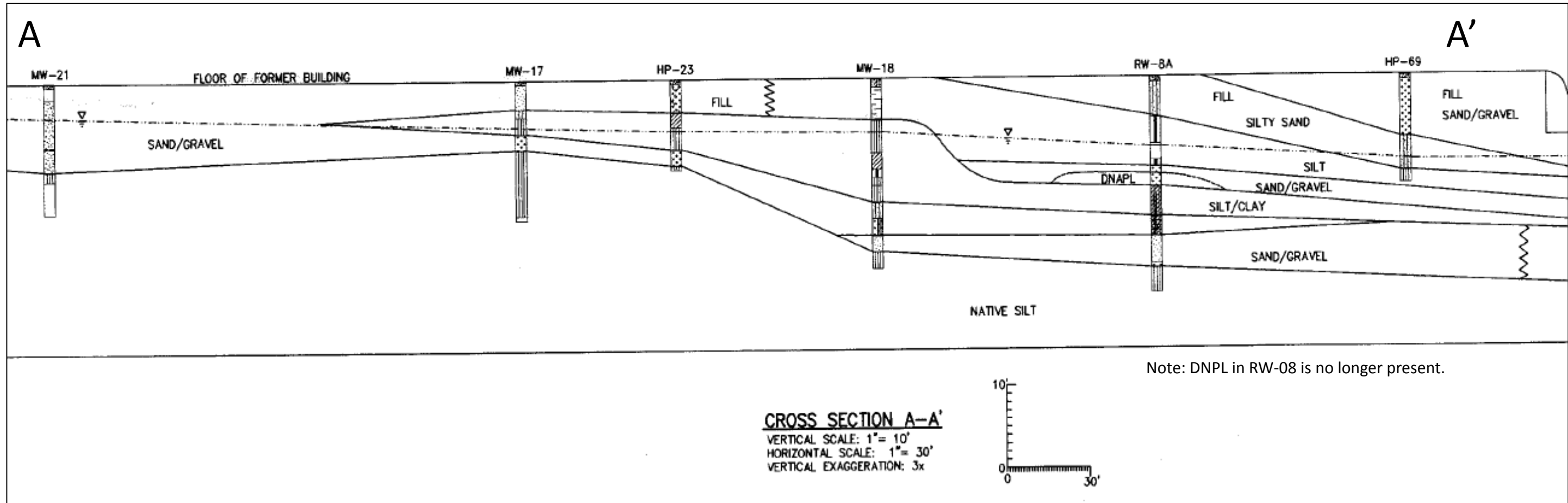
- Phytoremediation Areas
- Monitoring Well
- Abandoned MW
- Recovery Well
- Observation Probe
- Geoprobe Sample Location (2016)
- Temporary Monitoring Well
- Historic Soil and/or Groundwater Sample Location
- Shallow Soil Sample Location (November 10, 2016)
- Direct Contact Soil RCL Exceeded-None at the present time (see text).
- Soil to Groundwater RCL Exceeded
- Group A Study Area

Note: Arsenic concentrations exceeded the direct contact and groundwater to soil RCLs in several samples ranging between 1100 and 8940 micrograms/kg; however, these concentrations are believed to represent background levels (see text).



**FIGURE B.2.b
RESIDUAL SOIL CONTAMINATION
FORMER TRENT TUBE PLANT 1**

Base Map: Aerial Photo, April 4, 2014, Google Earth



Adapted from: Final Remedial Closure Plan, Trent Tube 1, Triad Engineering Inc., July 1999

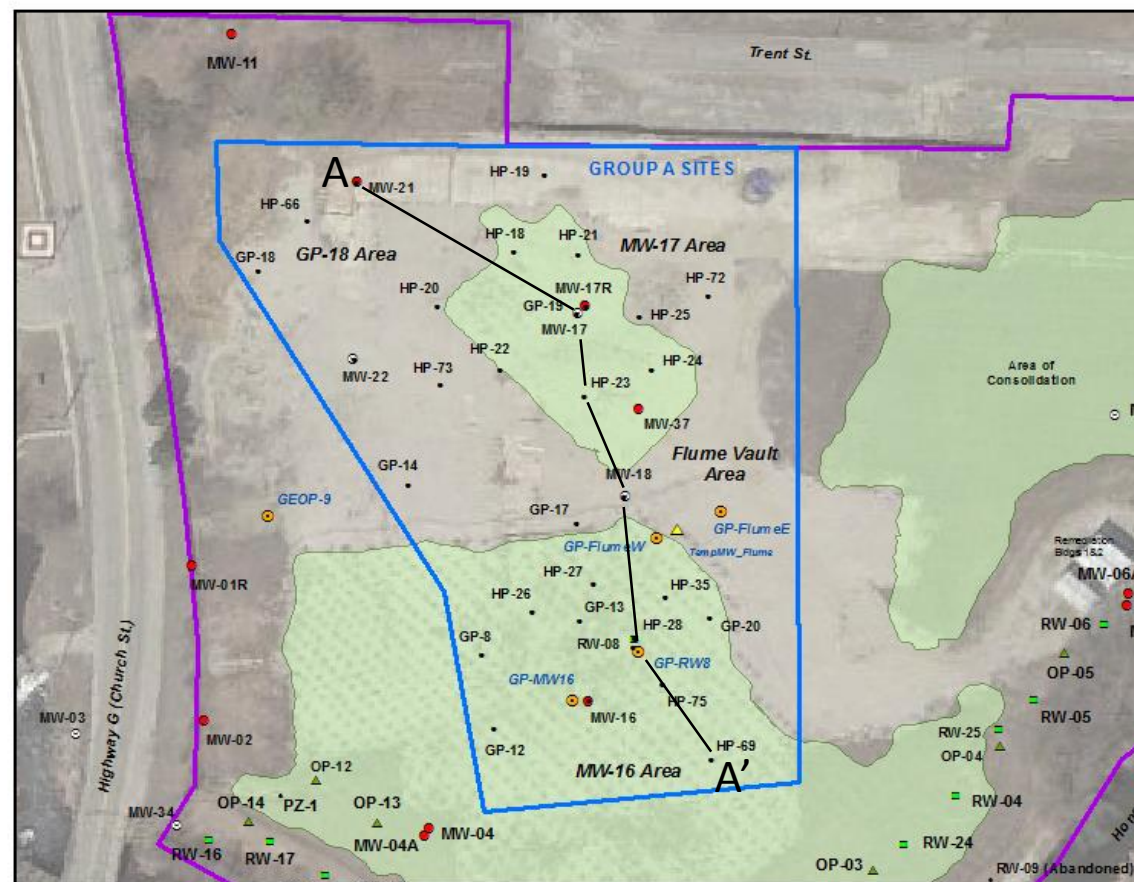
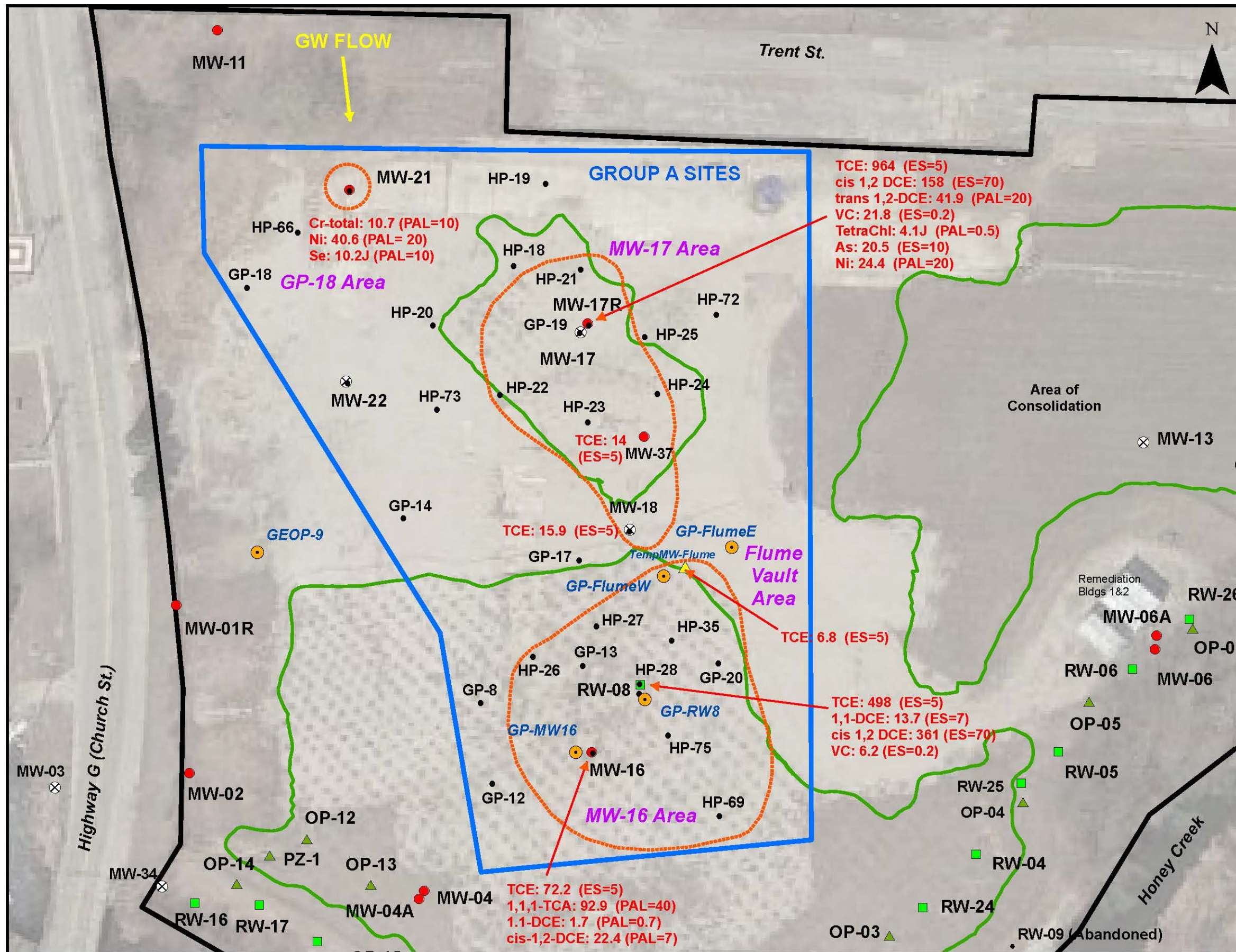
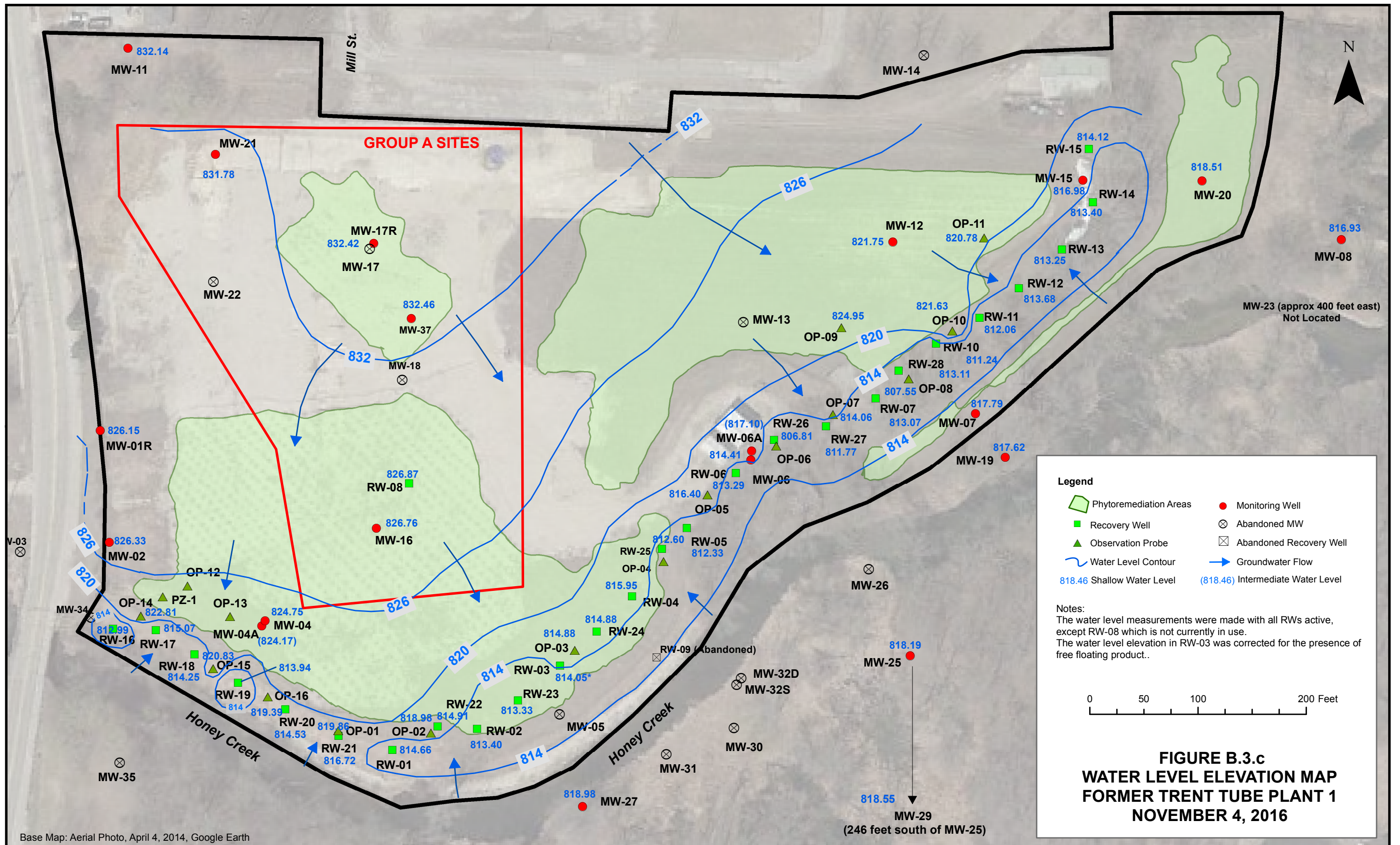


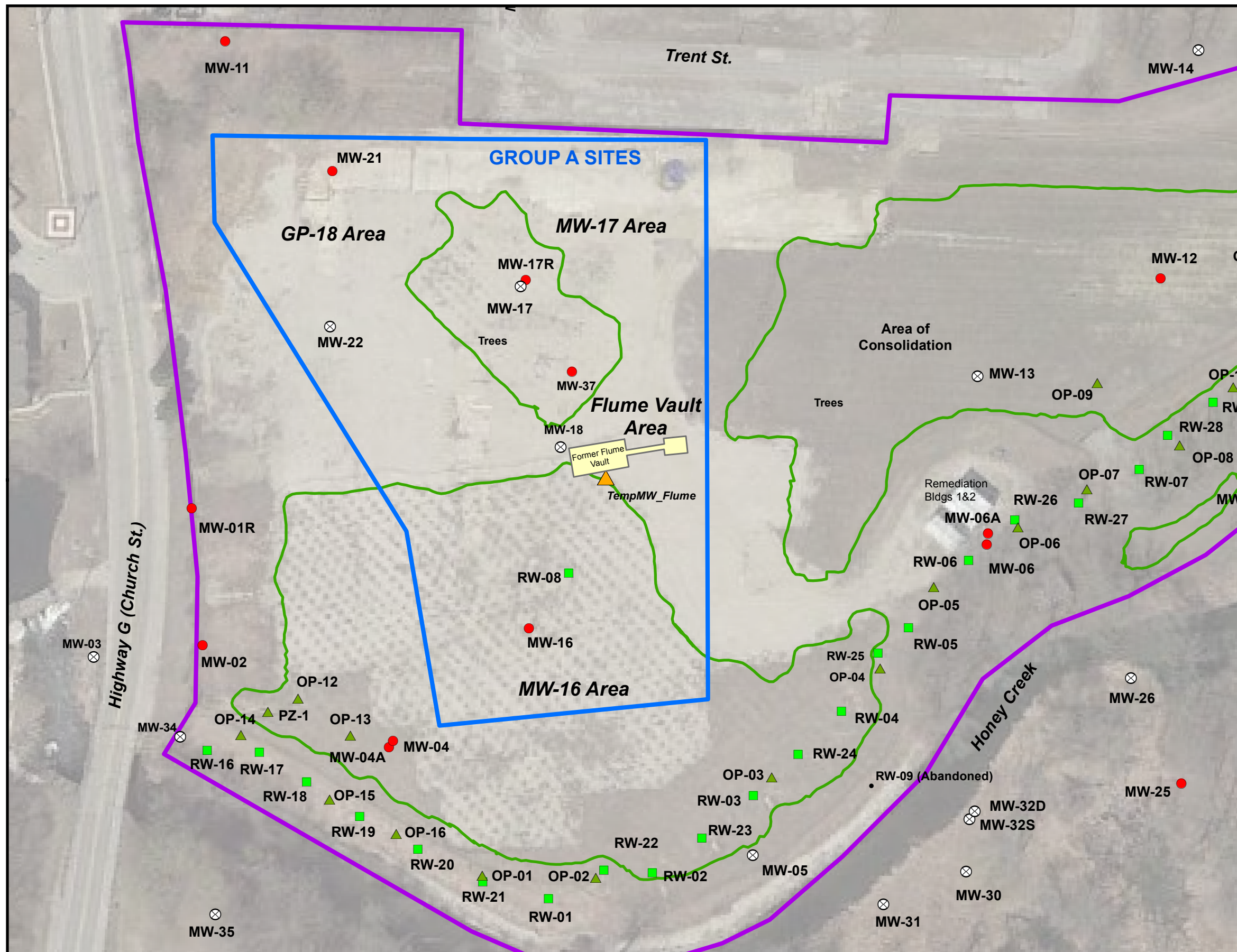
FIGURE B.3.a
GEOLOGIC CROSS SECTION
GROUP A- FORMER TRENT TUBE PLANT 1



**FIGURE B.3.b
GROUNDWATER
CONCENTRATIONS MAP-GROUP A
FORMER TRENT TUBE PLANT 1**

Base Map: Aerial Photo, April 4, 2014, Google Earth





Legend

- Phytoremediation Areas
- Monitoring Well
- Abandoned MW
- Recovery Well
- Observation Probe
- Temporary Monitoring Well (abandoned)
- Trent Tube 1 Boundary

0 40 80 160 Feet

FIGURE B.3.d
MONITORING WELLS-GROUP A
FORMER TRENT TUBE PLANT 1

Base Map: Aerial Photo, April 4, 2014, Google Earth

Attachment C

Documentation of Remedial Action

BRRTS No. 02-65-245827

Group A Site Closure

Trent Tube Plant 1

2188 Church Street

East Troy, Wisconsin

| Table of Contents | |
|---|--|
| Closure Form Title | Applicability |
| C.1. Site Investigation Documentation | Applicable – Previously Provided. See listing on following page. |
| C.2. Investigative Waste Disposal Documentation | Applicable - See response on following page. |
| C.3 RCL Determination | Applicable - See response on following page. |
| C.4 Construction Documentation | Applicable - See response on following page. |
| C.5 Decommissioning of Remedial Systems | Not Applicable – no remedial systems are proposed for decommissioning due to this closure application. |
| C.6 Other | Not Applicable |

Attachment C
Documentation of Remedial Action

The following documents submitted to the WDNR are referenced below as requested in Form 4400-202. The Trent Tube: Group A Confirmation Closure Sampling Report and the Trent Tube Group A Supplemental Investigation Report have been included in this attachment.

C.1. Site Investigation Documentation

- RJRudy, 2017, 2016 Group A Supplemental Soil and Groundwater Results Report
- RJRudy, 2016, Trent Tube: Group A Confirmation Closure Sampling Report.
- RJRudy, 2015, Trent Tube Plant 1 Site Investigation Report.
- Symbiont, 2007, Utility Corridor Investigation, Trent Tube No. 1.
- Symbiont, 2012, Limited Site Investigation Former Trent Tube Plant No. 1,
- Triad, 1995, Site Closure Investigation Plan for Trent Tube Plant No. 1.
- Triad 1996, Site Investigation Report, Trent Tube Plant No. 1, March 15, 1996.

C.2. Investigative Waste Disposal

Specific documents regarding investigative waste (IW) were not generated to the best of our knowledge. IW disposal, where documented, may be found in the site investigation reports.

C.3. Soil RCLs

Soil RCLs for direct contact and groundwater protection were obtained from the RCL Spreadsheet at: <http://dnr.wi.gov/topic/Brownfields/Professionals.html>.

C.4. Construction Documentation or As-built Reports

- Symbiont, 2006, Phytoremediation Monitoring and Maintenance Plan, Trent Tube Plant No. 1, dated March 8, 2006.
- Symbiont, 2012, Documentation Report, Flume Abandonment Activities, Trent Tube Plant No. 1.
- Symbiont, 2013, Documentation Report - Remedial Action Activities – Former Trent Tube Plant No. 1.
- Triad, 1996, Closure Report, South Pickle Area and Container Storage Areas.
- Triad, 1997, Remedial Design Report for Hydraulic Control, Trent Tube Plant No. 1, December 1997.
- Triad, 1999, Final Remedial Closure Plan, Trent Tube Plant No. 1, July 1999.
- Triad, 2000, Supplemental remedial Design Report for Hydraulic Control, Trent Tube Plant No, 1.
- Triad, 2002, Letter from Triad to Crucible Materials Corp regarding Soil Management Approach, dated May 9, 2002.
- Triad, 2003, Operation and Maintenance Manual, Trent Tube Plant No, 1.
- Triad, 2003, Soil Management Plan 2002-2003 Activities, Trent Tube Plant No. 1
- Triad 2004, Letter from Triad to WDNR dated September 10, 2014, regarding Retaining Wall Removal and Honey Creek Bank Excavation.

C.5. Decommissioning of Remedial Systems

No remedial systems in Group A are to be decommissioned.

C.6. Other

Not applicable.

Attachment D

Maintenance Plan(s) and Photographs

BRRTS No. 02-65-245827

Group A Site Closure

Trent Tube Plant 1

2188 Church Street

East Troy, Wisconsin

| Table of Contents | |
|--|-----------------------------------|
| Closure Form Title | Applicability |
| Group A Monitoring Well Maintenance Plan | Applicable |
| RJR Amended Groundwater and Recovery Well/Treatment Operation & Maintenance Plan | Applicable – Previously Submitted |
| RJR Amended Phytoremediation Operation and Maintenance Plan for Trent Tube Plant No. 1 | Applicable – Previously Submitted |

**EnPro Holdings, Inc.
Former Trent Tube Plant 1 Site
East Troy, Wisconsin**

RJRudy LLC

Group A Monitoring Well Maintenance Plan

BRRTS No. 02-65-245827

January 30, 2017

Monitoring Well Maintenance Plan

D.1. Descriptions and Contact Information

Description of Contamination

VOCs in Soil - soil VOC concentrations within the Group A area are less than the non-industrial direct contact RCLs. One soil sample taken from 0-4 feet at the time of closure exceeds the groundwater protection RCL for TCE (GA-SA7 at 39.3 J µg/kg).

Inorganics in Soil - Arsenic is present in soil at concentrations that are less than the background threshold value (BTV) of 8000 µg/kg (WDNR Publication RR940). The accompanying Group A Closure Application does not represent arsenic as a residual soil contaminant since concentrations are below the statewide As BTV. Concentrations of nickel and selenium exceed groundwater protection RCLs at all three areas of Group A in samples collected in November 2016.

VOCs in Groundwater - VOCs - Groundwater contamination exceeds the enforcement standard (ES) for VOCs in the MW16/Flume Area and the MW17 Area. Contaminants exceeding the ES and PAL for the MW16/Flume Area are: 1,1-dichloroethene, cis-1,2-dichloroethene, 1,2-dichloroethane, 1,1,1-trichloroethane, trichloroethene, tetrachloroethene, methylene chloride and vinyl chloride; for the MW17 Area are: cis-1,2-dichloroethene, trans-1,2-dichloroethene, tetrachloroethene, trichloroethene and vinyl chloride. There are no VOCs currently detected in groundwater exceeding the PAL or ES in the GP18 Area.

Inorganics in Groundwater - Arsenic exceeds the ES in MW17R. Inorganic exceedences of the PAL are: chromium in MW21 (GP18 Area), nickel in MW17R and MW21, and selenium in MW21.

Description of Monitoring Wells

The following wells in Group A were retained for continued groundwater monitoring:

MW-16
MW-17R
MW-21
MW-37
RW-8

The locations of these wells are shown in the location map provided under D.2 of this Plan. Photographs of each well are shown in Section D.3 of this Maintenance Plan. Each of the retained monitoring wells is equipped with a well seal and lock as shown in the photographs. In addition, the entire Trent Tube Plant 1 site is surrounded by a fence which has a locked gate deterring unauthorized access. The surface condition of each well for continued groundwater sampling operations is adequate.

Construction diagrams of the monitoring wells in Group A are not available, but surface seals are likely concrete grout or bentonite. The wells do not have apparent damage/degradation of the surface seal.

Description of Maintenance Plan Activities

Inspections of each monitoring well in Group A will take place during the June site-wide groundwater sampling event. The inspection will include:

- Verification of the integrity of the well labels, wellhead, covers and locks
- Inspection of the seal in the annular space to ensure that the well is not providing a conduit to the subsurface.
- The well label and lock will be replaced if broken or missing. Any damage to the wellhead equipment will be repaired.
- If the well seal is no longer sealing the annular space from surface contamination, the seal will be reinstalled using grout or bentonite pellets.

A retained monitoring well will be permanently abandoned where it is no longer being used or if the surface seal is damaged and providing a conduit for groundwater contamination. Such abandonment will be done in accordance with s. NR 141, Wis. Adm. Code.

This Monitoring Well Maintenance Plan and associated inspection reports will be located in the remediation building on-site.

More site-specific information can be found at the WDNR Fitchburg regional office case file or using BRRTS on the Web (<http://dnr.wi.gov/botw/SetUpBasicSearchForm.do>) under Case Number 02-65-245827. The site location is shown on the GIS Registry layer in the RR Sites Mapping Application, with links to BRRTS on the Web for site-specific information.

Contact Information

January 2017

Person Conducting the inspection and maintenance:

Matt Baake
Milwaukee, WI
414-292-7569

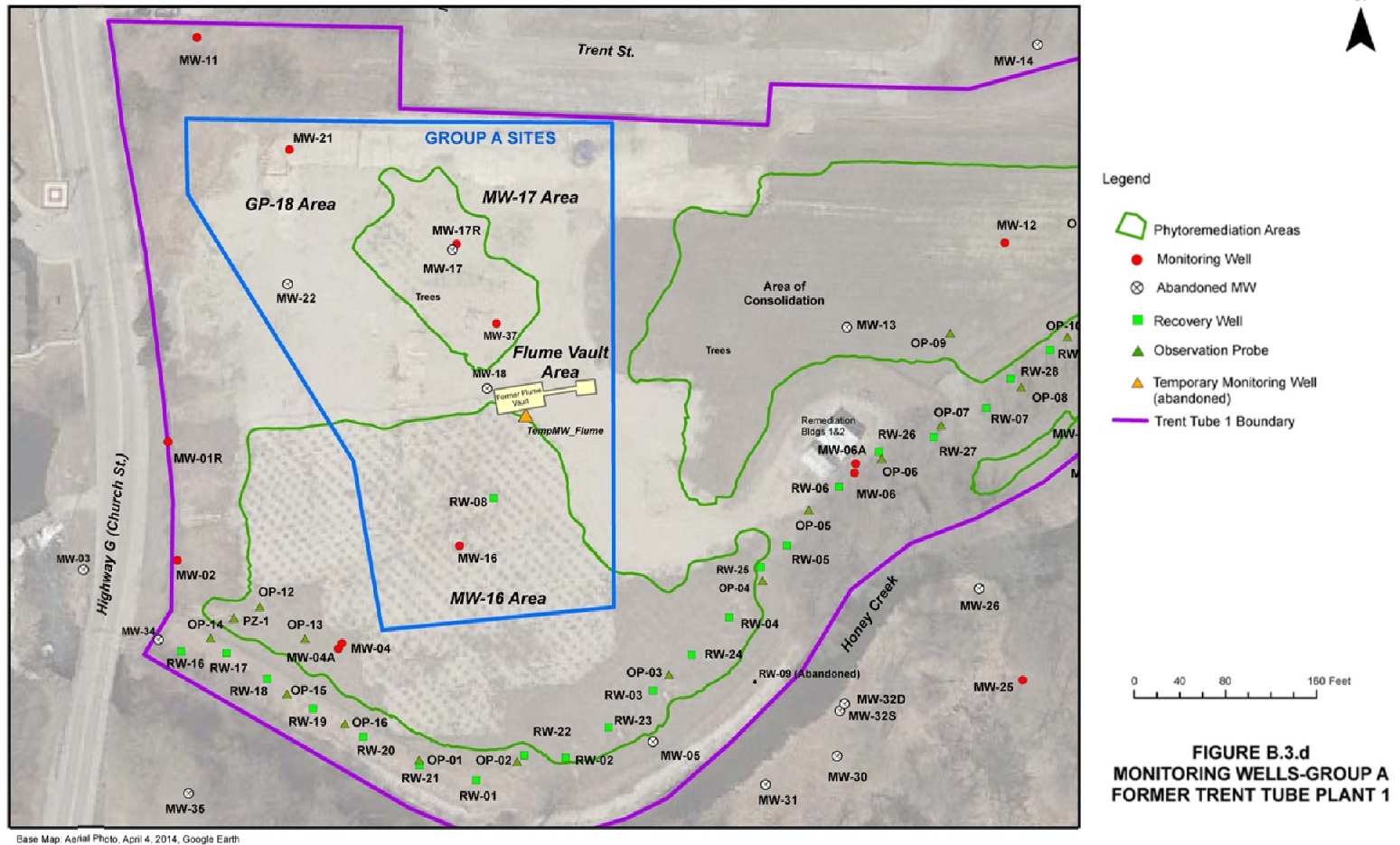


Signature: _____

Consultant: RJ Rudy LLC
500 Ridge Road
Ward, CO 80481
303-570-5604

DNR: Michael Schmoller
3911 Fish Hatchery Road
Fitchburg, WI 53711
608-275-3303

D.2 Location Map



D.3. Photographs of Monitoring Wells in Group A to Remain in Use



Trent Tube Plant 1 Group A Monitoring Well MW-16 – Photograph taken 1/17/17



Trent Tube Plant 1 Group A Monitoring Well MW-17R – Photograph taken 1/17/17



Trent Tube Plant 1 Group A Monitoring Well MW-21 – Photograph taken 1/17/17



Trent Tube Plant 1 Group A Monitoring Well MW-37 – Photograph taken 1/17/17



Trent Tube Plant 1 Group A Recovery Well RW-8 – Photograph taken 1/17/17

D.4. Continuing Obligations Inspection and Maintenance Log

The DNR fillable form 4400-305 (as shown) will be used to document continuing obligations at the site. Completed forms will be located in the on-site remediation building.

Save... Print... Clear Data Submit by Email

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

Continuing Obligations Inspection and Maintenance Log
Form 4400-305 (2/14) Page 1 of 2

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

| | |
|----------------------|-----------|
| Activity (Site) Name | BRRTS No. |
|----------------------|-----------|

| | |
|--|--|
| Inspections are required to be conducted (see closure approval letter): <input type="radio"/> annually <input type="radio"/> semi-annually <input type="radio"/> other -- specify _____ | When submittal of this form is required, submit the form electronically to the DNR project manager. An electronic version of this filled out form, or a scanned version may be sent to the following email address (see closure approval letter): _____ |
|--|--|

| Inspection Date | Inspector Name | Item | Describe the condition of the item that is being inspected | Recommendations for repair or maintenance | Previous recommendations implemented? | Photographs taken and attached? |
|-----------------|----------------|---|--|---|---|---|
| | | <input type="checkbox"/> monitoring well <input type="checkbox"/> cover/barrier <input type="checkbox"/> vapor mitigation system <input type="checkbox"/> other: | | | <input type="radio"/> Y <input type="radio"/> N | <input type="radio"/> Y <input type="radio"/> N |
| | | <input type="checkbox"/> monitoring well <input type="checkbox"/> cover/barrier <input type="checkbox"/> vapor mitigation system <input type="checkbox"/> other: | | | <input type="radio"/> Y <input type="radio"/> N | <input type="radio"/> Y <input type="radio"/> N |
| | | <input type="checkbox"/> monitoring well <input type="checkbox"/> cover/barrier <input type="checkbox"/> vapor mitigation system <input type="checkbox"/> other: | | | <input type="radio"/> Y <input type="radio"/> N | <input type="radio"/> Y <input type="radio"/> N |
| | | <input type="checkbox"/> monitoring well <input type="checkbox"/> cover/barrier <input type="checkbox"/> vapor mitigation system <input type="checkbox"/> other: | | | <input type="radio"/> Y <input type="radio"/> N | <input type="radio"/> Y <input type="radio"/> N |
| | | <input type="checkbox"/> monitoring well <input type="checkbox"/> cover/barrier <input type="checkbox"/> vapor mitigation system <input type="checkbox"/> other: | | | <input type="radio"/> Y <input type="radio"/> N | <input type="radio"/> Y <input type="radio"/> N |
| | | <input type="checkbox"/> monitoring well <input type="checkbox"/> cover/barrier <input type="checkbox"/> vapor mitigation system <input type="checkbox"/> other: | | | <input type="radio"/> Y <input type="radio"/> N | <input type="radio"/> Y <input type="radio"/> N |

Add Row

Save...

BRRTS No. _____

Activity (Site) Name _____

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

Page 2 of 2

{Click to Add/Edit Image} Date added:

Title:

{Click to Add/Edit Image} Date added:

Title:

Attachment E

Monitoring Well Information

BRRTS No. 02-65-245827
Group A Site Closure
Trent Tube Plant 1
2188 Church Street
East Troy, Wisconsin

| Table of Contents | |
|---|-------------------|
| Closure Form Title | Applicability |
| <p>Monitoring Well Information</p> <p>The Group A Area has the following groundwater monitoring wells which will remain in use at the site after closure to be used for ongoing monitoring of VOCs and metals. The maintenance plan for these wells is included in Attachment D.</p> <p>MW-16 MW-17R MW-21 MW-37 RW-8</p> <p>This attachment presents well completion Form 4400-113A for MW-21 and RW-8 and Form 4400-113B for MW-21. This was the only documentation available in the CMERT files.</p> | <p>Applicable</p> |

Route To: Watershed/Wastewater Waste Management
Remediation/Redevelopment Other

| | | |
|--|---------------------------|---|
| Facility/Project Name Trent Tube Plant 1 | County Walworth | Well Name MW-21 |
| Facility License, Permit or Monitoring Number | County Code 65 | Wis. Unique Well Number JL817 |
| | | DNR Well Number |

1. Can this well be purged dry? Yes No
2. Well development method:
- surged with bailer and bailed 4 1
 - surged with bailer and pumped 6 1
 - surged with block and bailed 4 2
 - surged with block and pumped 6 2
 - surged with block, bailed, and pumped 7 0
 - compressed air 2 0
 - bailed only 1 0
 - pumped only 5 1
 - pumped slowly 5 0
 - other
3. Time spent developing well **158 min.**
4. Depth of well (from top of well casing) **14.23 ft.**
5. Inside diameter of well **2.06 in.**
6. Volume of water in filter pack and well casing **7.1 gal.**
7. Volume of water removed from well **7.0 gal.**
8. Volume of water added (if any) **0.0 gal.**
9. Source of water added _____
10. Analysis performed on water added? Yes No
(If yes, attach results)

| | Before Development | After Development |
|--|--|--|
| 11. Depth to Water (from top of well casing) | a. 5.42 ft. | 14.00 ft. |
| Date | b. 03/31/1999 | 03/31/1999 |
| Time | c. 09:46 am | 12:00 am |
| 12. Sediment in well bottom | 0.0 inches | 0.0 inches |
| 13. Water clarity | Clear <input type="checkbox"/> 1 0 Turbid <input checked="" type="checkbox"/> 1 5 (Describe) <u>Light brown to gray, moderate turbidity, no odor</u> | Clear <input type="checkbox"/> 2 0 Turbid <input checked="" type="checkbox"/> 2 5 (Describe) <u>Brown to slightly gray, very turbid, no odor</u> |

Fill in if drilling fluids were used and well is at solid waste facility:

| | | |
|----------------------------|------|------|
| 14. Total suspended solids | mg/l | mg/l |
| 15. COD | mg/l | mg/l |

16. Well developed by: Person's Name and Firm
Ross Creighton
Triad Engineering Inc.

17. Additional comments on development:

Facility Address or Owner/Responsible Party Address

Name: Lynn Simonen

Firm: Trent Tube

Street: 2015 Energy Dr.

City/State/Zip: East Troy, WI 53120

I hereby certify that the above information is true and correct to the best of my knowledge.

Signature:

Print Name: Ross M. Creighton

Firm: Triad Engineering

NOTE: See instructions for more information including a list of county codes and well type codes.

Route To:

Watershed/Wastewater
Remediation/Redevelopment

Waste Management
Other

| | | |
|--|---|--|
| Facility/Project Name Trent Tube Plant 1 | Local Grid Location of Well _____ ft. <input type="checkbox"/> N. _____ ft. <input type="checkbox"/> E. _____ ft. <input type="checkbox"/> S. _____ ft. <input type="checkbox"/> W. | Well Name MW-21 |
| Facility License, Permit or Monitoring No. | Grid Origin Location (Check if estimated: <input type="checkbox"/>) Lat. 42° 46' 37.0" Long. 88° 24' 16.0" or | Wis. Unique Well No/DNR Well Number JL817 |
| Facility ID | St. Plane 289,135.0010 ft. N, 2,428,532.6100 ft. E. <input checked="" type="checkbox"/> C/N | Date Well Installed 03/24/1999 |
| Type of Well Well Code /M | Section Location of Waste/Source NW 1/4 of NW 1/4 of Sec. 29, T. 4 N, R. 18 <input checked="" type="checkbox"/> E <input type="checkbox"/> W | Well Installed By: (Person's Name and Firm) Larry Erdman |
| Distance Well Is From Waste/Source Boundary Unknown ft. | Location of Well Relative to Waste/Source u <input type="checkbox"/> Upgradient s <input type="checkbox"/> Sidegradient d <input type="checkbox"/> Downgradient n <input checked="" type="checkbox"/> Not Known | Boart Longyear |

- A. Protective pipe, top elevation 842.97 ft. MSL
- B. Well casing, top elevation 842.43 ft. MSL
- C. Land surface elevation 842.97 ft. MSL
- D. Surface seal, bottom 837.0 ft. MSL or 6.0 ft.

12. USCS classification of soil near screen:
 GP GM GC GW SW SP
 SM SC ML MH CL CH
 Bedrock

13. Sieve analysis attached? Yes No

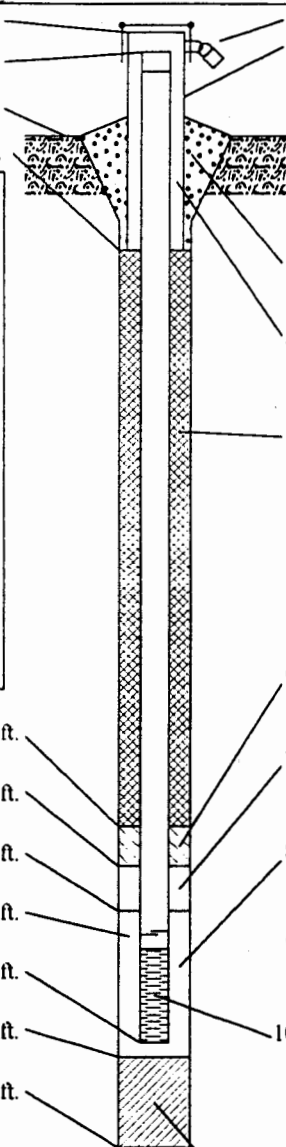
14. Drilling method used: Rotary 5 0
 Hollow Stem Auger 4 1
 _____ Other

15. Drilling fluid used: Water 0 2 Air 0 1
 Drilling Mud 0 3 None 9 9

16. Drilling additives used? Yes No

Describe _____

17. Source of water (attach analysis): _____



- 1. Cap and lock? Yes No
- 2. Protective cover pipe:
 - a. Inside diameter: 9.0 in.
 - b. Length: 1.0 ft.
 - c. Material: Steel 0 4
Other
 - d. Additional protection? Yes No
If yes, describe: Flushmount w/expandable geocap
- 3. Surface seal: Bentonite 3 0
Concrete 0 1
Other
- 4. Material between well casing and protective pipe: Bentonite 3 0
coarse sand Other
- 5. Annular space seal:
 - a. Granular Bentonite 3 3
 - b. _____ Lbs/gal mud weight Bentonite-sand slurry 3 5
 - c. _____ Lbs/gal mud weight Bentonite slurry 3 1
 - d. _____ % Bentonite Bentonite-cement grout 5 0
 - e. 2 Ft³ volume added for any of the above
 - f. How installed: Tremie 0 1
Tremie pumped 0 2
Gravity 0 8
- 6. Bentonite seal:
 - a. Bentonite granules 3 3
 - b. 1/4 in. 3/8 in. 1/2 in. Bentonite pellets 3 2
 - c. 3/8" chipped bentonite Other
- 7. Fine sand material: Manufacturer, product name and mesh size:
 - a. Badger BB#7
 - b. Volume added 1/2 bag ft³
- 8. Filter pack material: Manufacturer, product name and mesh size:
 - a. Red Flint #30
 - b. Volume added 5 bags ft³
- 9. Well casing: Flush threaded PVC schedule 40 2 3
 Flush threaded PVC schedule 80 2 4
 _____ Other
- 10. Screen material: PVC
 - a. Screen Type: Factory cut 1 1
Continuous slot 0 1
Other
 - b. Manufacturer Boart Longyear
 - c. Slot size: 0.010 in.
 - d. Slotted length: 10.0 ft.
- 11. Backfill material (below filter pack): None 1 4
Other

- E. Bentonite seal, top 841.5 ft. MSL or 1.5 ft.
- F. Fine sand, top 840.0 ft. MSL or 3.0 ft.
- G. Filter pack, top 839.0 ft. MSL or 4.0 ft.
- H. Screen joint, top 838.5 ft. MSL or 4.5 ft.
- I. Well bottom 828.5 ft. MSL or 14.5 ft.
- J. Filter pack, bottom 828.0 ft. MSL or 15.0 ft.
- K. Borehole, bottom 827.0 ft. MSL or 16.0 ft.
- L. Borehole, diameter 8.3 in.
- M. O.D. well casing 2.37 in.
- N. I.D. well casing 2.06 in.

I hereby certify that the information on this form is true and correct to the best of my knowledge.

Signature: [Signature] Firm: **Triad Engineering** 325 E. Chicago St. Milwaukee, WI 53202 Tel: 414-291-8840 Fax: 414-291-8841

Please complete both Forms 4400-113A and 4400-113B and return to the appropriate DNR office and bureau. Completion of these reports is required by chs. 160, 281, 283, 289, 291, 292, 293, 295, and 299, Wis. Stats., and ch. NR 141, Wis. Adm. Code. In accordance with chs. 281, 289, 291, 292, 293, 295, and 299, Wis. Stats., failure to file these forms may result in a forfeiture of between \$10 and \$25,000, or imprisonment for up to one year, depending on the program and conduct involved. Personally identifiable information on these forms is not intended to be used for any other purpose. NOTE: See the instructions for more information, including where the completed forms should be sent.

Route To: Watershed/Wastewater Waste Management
Remediation/Redevelopment Other

| | | |
|---|---|--|
| Facility/Project Name Trent Tube Plant 1 | Local Grid Location of Well 288830.441 ft. <input type="checkbox"/> N. <input type="checkbox"/> S. 2428721.598 ft. <input checked="" type="checkbox"/> E. <input type="checkbox"/> W. | Well Name RW-8 |
| Facility License, Permit or Monitoring No. | Grid Origin Location (Check if estimated: <input checked="" type="checkbox"/>) Lat. 42° 46' 37.0" Long. 88° 24' 16.0" or | Wis. Unique Well No. JL816 DNR Well Number |
| Facility ID | St. Plane 288,828.9360 ft. N, 2,428,722.1880 ft. E. <input checked="" type="checkbox"/> C/N | Date Well Installed 03/23/1999 |
| Type of Well Well Code 65/de | Section Location of Waste/Source NW 1/4 of NW 1/4 of Sec. 29, T. 4 N, R. 18 <input checked="" type="checkbox"/> E <input type="checkbox"/> W | Well Installed By: (Person's Name and Firm) Larry Erdman |
| Distance Well Is From Waste/Source Boundary Unknown ft. | Location of Well Relative to Waste/Source u <input type="checkbox"/> Upgradient s <input type="checkbox"/> Sidegradient d <input type="checkbox"/> Downgradient n <input checked="" type="checkbox"/> Not Known | Boart Longyear |

- A. Protective pipe, top elevation 842.67 ft. MSL
- B. Well casing, top elevation 842.19 ft. MSL
- C. Land surface elevation 842.67 ft. MSL
- D. Surface seal, bottom 836.7 ft. MSL or 6.0 ft.

12. USCS classification of soil near screen:
 GP GM GC GW SW SP
 SM SC ML MH CL CH
 Bedrock

13. Sieve analysis attached? Yes No

14. Drilling method used: Rotary 5 0
 Hollow Stem Auger 4 1
 Other

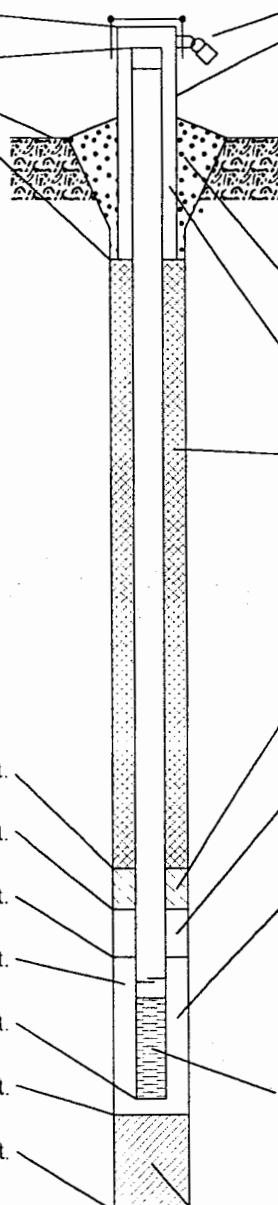
15. Drilling fluid used: Water 0 2 Air 0 1
 Drilling Mud 0 3 None 9 9

16. Drilling additives used? Yes No

Describe _____

17. Source of water (attach analysis): _____

- E. Bentonite seal, top 842.2 ft. MSL or 0.5 ft.
- F. Fine sand, top 836.7 ft. MSL or 6.0 ft.
- G. Filter pack, top 835.9 ft. MSL or 6.8 ft.
- H. Screen joint, top 833.9 ft. MSL or 8.8 ft.
- I. Well bottom 828.9 ft. MSL or 13.8 ft.
- J. Filter pack, bottom 828.7 ft. MSL or 14.0 ft.
- K. Borehole, bottom 826.7 ft. MSL or 16.0 ft.
- L. Borehole, diameter 14.0 in.
- M. O.D. well casing 6.62 in.
- N. I.D. well casing 6.38 in.



- 1. Cap and lock? Yes No
- 2. Protective cover pipe:
 - a. Inside diameter: 12.0 in.
 - b. Length: 1.0 ft.
 - c. Material: Steel 0 4
Other
- d. Additional protection? Yes No
 If yes, describe: Flushmount w/expandable geocap
- 3. Surface seal: Bentonite 3 0
Concrete 0 1
Other
- 4. Material between well casing and protective pipe: Bentonite 3 0
Other
- 5. Annular space seal:
 - a. Granular Bentonite 3 3
 - b. Lbs/gal mud weight Bentonite-sand slurry 3 5
 - c. Lbs/gal mud weight Bentonite slurry 3 1
 - d. % Bentonite Bentonite-cement grout 5 0
 - e. 5 Ft³ volume added for any of the above
 - f. How installed: Tremie 0 1
Tremie pumped 0 2
Gravity 0 8
- 6. Bentonite seal:
 - a. Bentonite granules 3 3
 - b. 1/4 in. 3/8 in. 1/2 in. Bentonite pellets 3 2
 - c. 3/8" chipped bentonite Other
- 7. Fine sand material: Manufacturer, product name and mesh size:
 - a. Badger BB#7
 - b. Volume added 1 bag ft³
- 8. Filter pack material: Manufacturer, product name and mesh size:
 - a. Red Flint #30
 - b. Volume added 5 bags ft³
- 9. Well casing: Flush threaded PVC schedule 40 2 3
 Flush threaded PVC schedule 80 2 4
 Stainless steel Other
- 10. Screen material: Stainless steel
 - a. Screen Type: Factory cut 1 1
Continuous slot 0 1
Other
 - b. Manufacturer Boart Longyear
 - c. Slot size: 0.010 in.
 - d. Slotted length: 5.0 ft.
- 11. Backfill material (below filter pack): None 1 4
Other

I hereby certify that the information on this form is true and correct to the best of my knowledge.
 Signature: *[Signature]* Firm: **TE Triad Engineering Incorporated** Tel: 414.291.8840
 325 E. Chicago St. Milwaukee, Wisconsin 53202 Fax: 414.291.8841

Please complete both Forms 4400-113A and 4400-113B and return to the appropriate DNR office and bureau. Completion of these reports is required by chs. 160, 281, 283, 289, 291, 292, 293, 295, and 299, Wis. Stats., and ch. NR 141, Wis. Adm. Code. In accordance with chs. 281, 289, 291, 292, 293, 295, and 299, Wis. Stats., failure to file these forms may result in a forfeiture of between \$10 and \$25,000, or imprisonment for up to one year, depending on the program and conduct involved. Personally identifiable information on these forms is not intended to be used for any other purpose. NOTE: See the instructions for more information, including where the completed forms should be sent.

Attachment F

Source Legal Documents

BRRTS No. 02-65-245827

Group A Site Closure

Trent Tube Plant 1

2188 Church Street

East Troy, Wisconsin

| Table of Contents | |
|----------------------------|---------------|
| Closure Form Title | Applicability |
| F.1 Deed | Applicable |
| F.2 Certified Survey Map | |
| F.3 Verification of Zoning | Applicable |
| F.4 Signed Statement | |

STATE BAR OF WISCONSIN FORM 3 - 2000
QUIT CLAIM DEED

Document Number



Doc # 809617
Recorded
February 15, 2011 8:31 AM

This Deed, made between CRUCIBLE MATERIALS CORPORATION, a Delaware corporation, Debtor-in-Possession, Grantor, and Bruce A. Keyes, his successors and assigns, not individually but solely in his capacity as Trustee of the Crucible Materials Corporation Environmental Response Trust, Grantee.

CONNIE J WOOLEVER
REGISTER OF DEEDS
WALWORTH COUNTY, WI
Fee Amount: \$30.00
Transfer Fee: \$736.50
Total Pages: 2

Grantor quit claims to Grantee the following described real estate in Walworth County, State of Wisconsin (if more space is needed, please attach addendum):

See Exhibit A

Together with all appurtenant rights, title and interests.

Property Address (for informational purposes only):
Church Street, Village of East Troy, WI

Recording Area

Name and Return Address

Bruce A. Keyes
Foley & Lardner LLP
777 East Wisconsin Avenue
Milwaukee, WI 53202-5306
Chicago Title Insurance Co.
210 E. O'Connor Dr.
Suite 107
Elkhorn, WI 53121

RXUP 00160 and RXUP 00166
Parcel Identification Number (PIN)
This is not homestead property.

Dated this 12 day of January, 2011.

CRUCIBLE MATERIALS CORPORATION

(SEAL)

* _____

David Robbins (SEAL)

* David Robbins, Debtors Representative

(SEAL)

* _____

(SEAL)

* _____

AUTHENTICATION

Signature(s) _____
authenticated this _____ day of January, 2011.

* _____

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

THIS INSTRUMENT WAS DRAFTED BY

Blaine Lamperski, Esq.

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

ACKNOWLEDGMENT

COMMONWEALTH OF PENNSYLVANIA)
) ss.
Allegheny County)

Personally came before me this 12 day of January, 2011 the above named David Robbins, Debtors Representative, to me known to be the person who executed the foregoing instrument and acknowledged the same.

Donna L. Joyce
* Donna L. Joyce

Notary Public, Commonwealth of Pennsylvania

My Commission is permanent. (If not, state expiration date:

Oct. 28, 2011)

COMMONWEALTH OF PENNSYLVANIA

Notarial Seal
Donna L. Joyce, Notary Public
City Of Pittsburgh, Allegheny County
My Commission Expires Oct. 28, 2011
Member, Pennsylvania Association of Notaries

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

QUIT CLAIM DEED

STATE BAR OF WISCONSIN

EXHIBIT A

All that certain parcel of land situated in the NW 1/4 of Section 29, T4N, R18E, Village of East Troy, Walworth County, Wisconsin, more particularly described as follows:

Commence at the Southwest corner of Block 19 Original Plat of the Village of East Troy; thence S. 24° W. 58.08 feet to the centerline of Church Street (said point being also described as located in the centerline of Church Street 49.50 feet South, measured at right angles, of the South line of Block 19 of said Original Plat extended West); thence S. 12° 35' E. along said centerline 75.36 feet to the PLACE OF BEGINNING; thence S. 89° 53' E. parallel to the South line of Block 19 Original Plat 156.93 feet to an iron pipe; thence N. 0° 14' E. 11.97 feet to an iron pipe; thence S. 89° 48' E. 43.03 feet to an iron pipe; thence N. 0° 07' W. 61.68 feet to an iron pipe; thence S. 89° 53' E. 136.42 feet to a point on the East line of Mill Street 49.5 feet South of the Southwest corner of Block 20 of the Original Plat; thence South 35 feet to the South line of Trent Street; thence Easterly along said South line 448.12 feet to the East line of Hillcrest Avenue; thence North along said East line 50.5 feet to the Southwest corner of Lot 9 of Marion Subdivision; thence N. 89° 54' E. along the South line of said lot 244.28 feet to the East line of the West one-half of the Northwest one-quarter of Section 29, Township 4 North, Range 18 East of said Walworth County, being also the East line of Marion Subdivision; thence Northerly along said East line 673.59 feet to the Northeast corner of Marion Subdivision; thence Westerly along the North line of said Marion Subdivision 323.40 feet; thence N. 0° 58' W. 320.19 feet to South line of Section 20, Township 4 North, Range 18 East; thence S. 89° 10' W. along said South line 29.70 feet to the East line of Block 13 of the Original Plat of the Village of East Troy; thence N. 19° 30' W. along said East line 457.60 feet; thence N. 88° 37' E. 162.76 feet; thence South 169.39 feet; thence East 75 feet; thence South 265.15 feet to the South line of the above mentioned Section 20; thence N. 89° 10' E. along said South line 735.55 feet; thence South 1107.71 feet, more or less, to the centerline of Honey Creek; thence Southwesterly along said centerline to the Southwest corner of the Northeast quarter of the Northwest quarter of the aforesaid Section 29 (as fenced); thence South along the East line of the West one-half of the Northwest quarter of said Section 29 and the centerline of Honey Creek 26.01 feet; thence along the centerline of Honey Creek the following eight courses and distances, viz.: S. 49° 27' W. 44.12 feet, S. 57° 42' W. 175.80 feet, S. 82° 19' W. 143.00 feet, S. 33° 59' W. 137.59 feet, S. 49° 39' W. 108.09 feet, S. 69° 20' W. 94.47 feet, S. 85° 54' W. 111.22 feet, and N. 67° 02' W. 318.42 feet to the centerline of Church Street; thence N. 5° 36' E. along said centerline 171.45 feet; thence continue along said centerline N. 13° 17' W. 134.52 feet; thence continue along said centerline N. 12° 35' W. 203.46 feet to the place of beginning.

Tax Key No: RXUP 00160 and RXUP 00166

Village of East Troy.

Zoning Code Portal | Interactive Map

Property Details

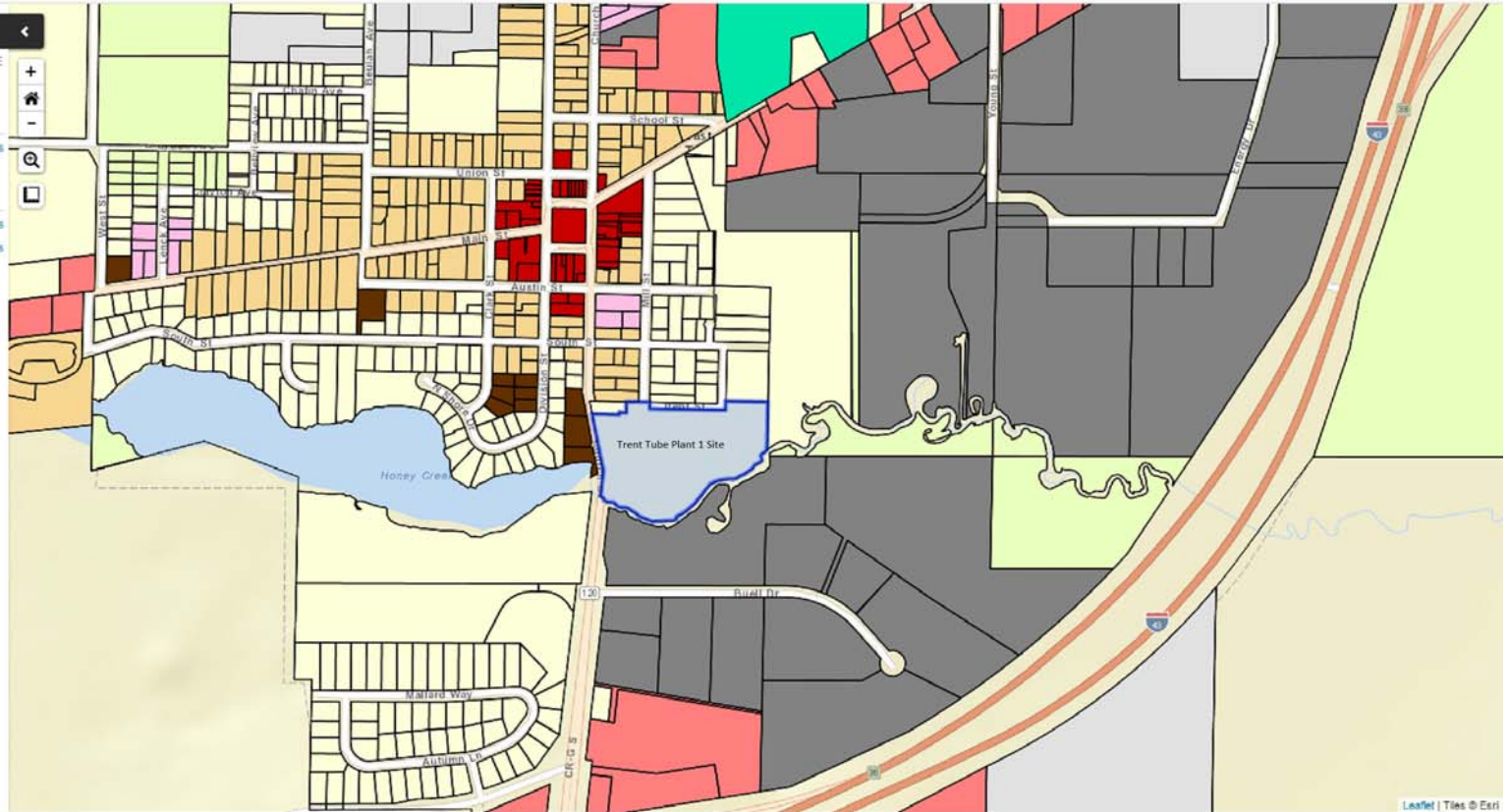
Owner: CRUCIBLE MATERIALS CORP ENVIRONMENTAL RESPONSE TRUST
Address: 2174 CHURCH ST EAST TROY
Parcel Number: RXUP 00165

Zoning District(s)
 SR-4 - Suburban Residential

Overlay District(s)

Floodplain
 Shoreland-Wetland

Create Parcel Summary



F.3 - Zoning Map

Attachment G

Notifications to Owners of Affected Properties

BRRTS No. 02-65-245827

Group A Site Closure

Trent Tube Plant 1

2188 Church Street

East Troy, Wisconsin

| Table of Contents | |
|--|---------------|
| Closure Form Title | Applicability |
| Under NR 726, prior to requesting closure for sites with residual contamination, the responsible party needs to notify any affected parties about residual contamination and that the site will be included on a publically accessible database. | Applicable |

Notice: Pursuant to s. 292.12(4), Wis. Stats., written notification of parties affected by residual contamination is required. Pursuant to ch. NR 725, Wis. Adm. Code, this form is required to be completed for those sites meeting the criteria in s. NR 725.05 (see below), by a responsible party seeking case closure approval pursuant to ch. NR 726, Wis. Adm. Code or by those persons seeking a remedial action plan approval pursuant to ch. NR 722, Wis. Adm. Code, or by local government units or economic development corporations that are required to take an action pursuant to ch. NR 708, Wis. Adm. Code, when the Department of Natural Resources (DNR) determines that notification is necessary. Personally identifiable information collected will be used for program administration and may be provided to requesters to the extent required by Wisconsin's Open Records law (ss. 19.31-19.39, Wis. Stats.). (Unless otherwise noted, citations refer to Wis. Adm. Code.)

Note: A copy of each completed form must also be submitted to the WI Department of Natural Resources, in accordance with s. NR 726.09 (3), Wis. Adm. Code.

Directions:

1. Include the first page of this form, **Contact Information**, as an attachment with all notifications sent using Sections A and B. (*Filling out the Contact Information page allows for automatic entry of the contact information within the letter.*)
2. To notify affected parties about residual contamination and continuing obligations, use the appropriate section (A, B or C), based on the type of property to which the required notification is to be sent, per s. NR 725.05 and 725.07, Wis. Adm. Code:
Section A: Deeded Properties
Section B: Right-of-Way (ROW) - non-Department of Transportation
Section C: Department of Transportation (DOT) ROW
3. Select and use the applicable paragraphs, based on the types of residual contamination and continuing obligations for the specific property. For the "Residual Contamination" and "Continuing Obligations on Your Property" sections, the applicable language will appear upon selection of the checkboxes.
4. Include the information requested within each paragraph. If requesting remedial action plan approval, or if the Department has directed a local governmental unit to take an action at a site, modify the language regarding a "closure request" to reflect the appropriate situation ("remedial action plan approval" or a "liability clarification letter").
5. Once completed, print the form for mailing.
6. Under s. NR 725.07, Wis. Adm. Code, notification letters under section A and B are required to be sent via certified mail, return receipt requested, or priority mail with signature confirmation. If the notifications are sent via priority mail with signature confirmation, you may use the signature waiver option if you have reason to believe that the owner of the property or other recipient may refuse to sign for the notification.

Situations for Which Notifications are Required:

Under s. NR 725.07, Wis. Adm. Code, notification is required for the following situations:

- groundwater contamination that attains or exceeds applicable standards remains upon completion of the remedial action
- soil contamination that attains or exceeds applicable standards remains upon completion of the remedial action,
- one or more monitoring wells have not been located for abandonment (fill and seal), or
- one or more monitoring wells will be kept for future monitoring.
Do not use this option if the well/s are to be transferred to another site for continued monitoring. That will be addressed in the final closure letter, upon documentation that responsibility for the well/s has been accepted by the responsible party for the other site.
- a cover (which may include soil covers, pavement, engineered cover, foundations) was used to address exposure by either direct contact or the groundwater pathway,
- a structural impediment (generally a building or other type of structure) prevented completion of a site investigation or remedial action. *This may also apply to site-specific situations which prevent a complete investigation or cleanup, such as an overhead power lines. Contact the agency with administrative authority first for site-specific situations.*
- soil contamination has only been cleaned up to industrial residual contaminant levels, and the property's land use has been classified as industrial under ch. NR 720,
- (vapor) the continued operation of a vapor mitigation system is necessary in order to limit or prevent vapor intrusion. *Notification is provided to the current property owner when that person is not the responsible party conducting the cleanup, and to any other property owners when sub-slab vapor risk screening levels are exceeded, and the operation and maintenance of a vapor mitigation system is necessary in order to limit or prevent vapor intrusion.*

- (vapor) vapor inhalation exposure assumptions for a non-residential setting will be applied for closure.

Notification is provided to the current property owner when that person is not the responsible party conducting the cleanup, and to any other property owner where residential vapor action levels are exceeded, including at properties used for commercial or industrial purposes.

- (vapor) contamination in soil or groundwater from volatile compounds remains after completion of the remedial action, that could lead to vapor intrusion upon new construction, reconstruction or occupation of an existing building.

This is especially important in cases where elevated residual soil concentrations or large volumes of soil contaminated with volatile compounds remain. Notification is provided to the current property owner when that person is not the responsible party conducting the cleanup, and to any other property owner where vapors may pose a health issue if buildings are to be constructed in the future, or if other land use changes or actions could result in a completed vapor pathway. This includes expansion or reconstruction of existing buildings.

The Department may also require a condition based on site-specific circumstances. In this case, consult with the project manager to determine what specific information to include in the notification of any affected property owner or right-of-way holder. *This has been used in limited situations where actions such as methane monitoring or fencing were required.*

Parties Receiving Notifications:

Under s. NR 725.05, Wis. Adm. Code, notification must be provided to:

- the owner of each property within or partially within the contaminated site or facility boundaries, other than properties owned by the responsible party,
- occupants of affected properties, as appropriate, *(consult with the project manager if you have questions)*
- the clerk of the county, town, village or city in which an affected public street or highway ROW is located, and municipal department or state agency that is responsible for the maintaining the public street or highway,
- the railroad that maintains the railroad right of way, and
- the owner of each property where a monitoring well will remain, for future abandonment or continued monitoring.

A summary of the notifications sent is to be provided in the case closure request form (4400-202). The attachment for "Notifications to Owners of Affected Properties", in Form 4400-202 includes a summary table of all notifications sent to all property owners or occupants of affected properties and to holders of affected ROWs, a copy of each letter sent, and a proof of receipt for each letter.

Note: A response to a closure request cannot be provided until at least 30 days after this notification letter has been sent. Documentation that this letter has been sent must be provided to the agency with administrative authority for an approval or decision under ch. NR 726, Wis. Adm. Code.

List of Potential Attachments:

(list all attachments to be included; include name of attachment and figure numbers)

Maps

Section A

Monitoring Well Location Map - (Filling & Sealing, Continue Sampling of Wells)

Location of Cover in relation to the extent of contamination (Maintenance of a Cover)

Section B

Monitoring Well Location Map - (Filling & Sealing, Continue Sampling of Wells)

Section C:

Groundwater Isoconcentration Map

Soil Isoconcentration Map

Maintenance plan

Section A

Maintenance of Plan - (Maintenance of a cover, Barrier, and/or Vapor Mitigation System)

Factsheets:

Section A

RR 819, Continuing Obligations for Environmental Protection

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

RR 892, Vapor Intrusion: What to Expect if Vapor Intrusion from Soil and Groundwater Contamination Exist on My Property

Section B

Groundwater RR 892, Vapor Intrusion: What to Expect if Vapor Intrusion from Soil and Groundwater Contamination Exist on My Property

Notification of Continuing Obligations and Residual Contamination

Form 4400-286 (9/15)

C. I. Page

The affected property is:

- the source property (the source of the hazardous substance discharge), but the property is not owned by the person who conducted the cleanup (a deeded property)
- a deeded property affected by contamination from the source property
- a right-of-way (ROW)
- a Department of Transportation (DOT) ROW

Include this completed page as an attachment with all notifications provided under sections A and B.

Contact Information

Responsible Party: The person responsible for sending this form, and for conducting the environmental investigation and cleanup is:

Responsible Party Name EnPro Holdings, Inc.

| | | | |
|--|-------------------|-------------|--|
| Contact Person Last Name Hutson | First Benne | MI C | Phone Number (include area code) (704) 731-1500 |
| Address 5605 Carnegie Blvd Suite # 500 | City Charlotte | State NC | ZIP Code 28209 |
| E-mail <u>Benne.Hutson@enproindustries.com</u> | | | |

Name of Party Receiving Notification:

Business Name, if applicable: Crucible Materials Corporation Environmental Response Trust (CMERT)

| | | | | |
|--------------------------------------|--------------------|-------------------|-------------|--|
| Title Mr. | Last Name Keyes | First Bruce | MI A | Phone Number (include area code) (414) 271-2400 |
| Address 777 East Wisconsin Avenue | | City Milwaukee | State WI | ZIP Code 53202 |

Site Name and Source Property Information:

Site (Activity) Name Trent Tube (Plant 1)

| | | | |
|----------------------------------|-------------------|-------------|-------------------|
| Address 2188 Church Street | City East Troy | State WI | ZIP Code 53120 |
| DNR ID # (BRRS#) 02-65-245827 | (DATCP) ID # | | |

Contacts for Questions:

If you have any questions regarding the cleanup or about this notification, please contact the Responsible Party identified above, or contact:

Environmental Consultant: RJ Rudy LLC

| | | | |
|--------------------------------------|---------------|-------------|--|
| Contact Person Last Name Rudy | First Rick | MI J | Phone Number (include area code) (303) 570-5604 |
| Address 500 Ridge Road | City Ward | State CO | ZIP Code 80481 |
| E-mail <u>rickrudy@rjrudyllc.com</u> | | | |

Department Contact:

To review the Department's case file, or for questions on cleanups or closure requirements, contact:

Department of: Natural Resources (DNR)

| | | | |
|--|-------------------|-------------|--|
| Address 3911 Fish Hatchery Road | City Fitchburg | State WI | ZIP Code 53711 |
| Contact Person Last Name Schmoller | First Michael | MI | Phone Number (include area code) (608) 275-3303 |
| E-mail (Firstname.Lastname@wisconsin.gov) <u>Michael.Schmoller@wisconsin.gov</u> | | | |

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

KEEP THIS DOCUMENT WITH YOUR PROPERTY RECORDS

777 East Wisconsin Avenue
Milwaukee, WI, 53202

Dear Mr. Keyes:

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

I have investigated a release of:

Chlorinated solvents, metals, VOCs, petroleum hydrocarbons, RCRA Subtitle C wastes.

on 2188 Church Street, East Troy, WI, 53120 that has shown that contamination remains on this source property.

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

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

Please review the enclosed legal description of your property, and notify Rick Rudy at 500 Ridge Road, Ward, CO, 80481 within the next 30 days if the legal description is incorrect.

The DNR will not review my closure request for at least 30 days after the date of receipt of this letter. As an affected property owner, you have a right to contact the DNR to provide any technical information that you may have that indicates that closure should not be granted for this site. If you would like to submit any information that is relevant to this closure request, or if you want to waive the 30 day comment period, you should mail that information to the DNR contact: 3911 Fish Hatchery Road, Fitchburg, WI, 53711, or at Michael.Schmoller@wisconsin.gov.

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

The responses included

Excavation, installation/operation of a phytoremediation system and installation/operation of a groundwater extraction and treatment system.

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

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

Contract for responsibility for continuing obligation:

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

Continuing obligations on your property will be the responsibility of EnPro Holdings, Inc. pursuant to DNR Consent Order No. 2013-SEEE-044.

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

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

Remaining Contamination:

Soil Contamination:

Soil contamination remains at :

The Group A area soil contamination remaining is shown in Figure B.2.b of the closure application.

The remaining contaminants include:

Trichloroethene, nickel and selenium.

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

Excavation, installation/operation of a phytoremediation system and installation/operation of a groundwater extraction and treatment system.

Groundwater Contamination:

Groundwater contamination originated at the property located at 2188 Church Street, East Troy, WI, 53120. The levels of

Trichloroethene, cis-1,2-dichloroethene, 1,1-dichloroethene and vinyl chloride.

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

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

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

Residual Soil Contamination:

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

- determine if contamination is present
- determine whether the material would be considered solid or hazardous waste
- ensure that any storage, treatment or disposal is in compliance with applicable statutes and rules.

Contaminated soil may be managed in-place, in accordance with ch. NR 718, Wis. Adm. Code, with prior DNR approval. In addition, all current and future property owners and occupants of the property and right-of-way holders need to be aware that excavation of the contaminated soil may pose an inhalation or other direct contact hazard and as a result special precautions may need to be taken during excavation activities to prevent a health threat to humans.

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

Continued Sampling of Monitoring Wells:

Continued monitoring of well/s MAP has been requested.

A sampling plan was approved on 06/02/2016

Yearly inspections for well integrity will be required. Documentation may be required to be submitted. Once monitoring is no longer needed or required, the well/s need to be filled and sealed in accordance with ch. NR 141, Wis. Adm. Code. Documentation of well filling and sealing needs to be provided to the DNR on form 3300-005, at <http://dnr.wi.gov/fiels/pdf/forms/3300/3300-005.pdf>.

A map, Figure B3D, is attached, which shows the location of well /s # MAP.

Site specific condition

Operation and maintenance of phytoremediation system.

Operation and maintenance of a groundwater extraction and treatment system.

Maintenance and Audits of Continuing Obligations:

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

GIS Registry and Well Construction Requirements:

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

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

Site Closure:

If the DNR grants closure, you will receive a letter which defines the specific continuing obligations on your property. The status of the site (open or closed) may also be checked by searching BRRTS on the Web. You may view or download a copy of the closure letter (sent to the responsible party) from BRRTS on the Web. You may also request a copy of the closure letter from the **responsible party** or by writing to the DNR contact, at Michael Schmoller, Michael.Schmoller@wisconsin.gov, (608) 275-3303. The final closure letter will contain a description of the continuing obligation, any prohibitions on activities and will include any applicable maintenance plan.

If you have any questions regarding this notification, I can be reached at: (303) 570-5604
rickrudy@rjrudyllc.com

Date Signed 3/16/2017

Signature of responsible party/environmental consultant for the responsible party

Attachments

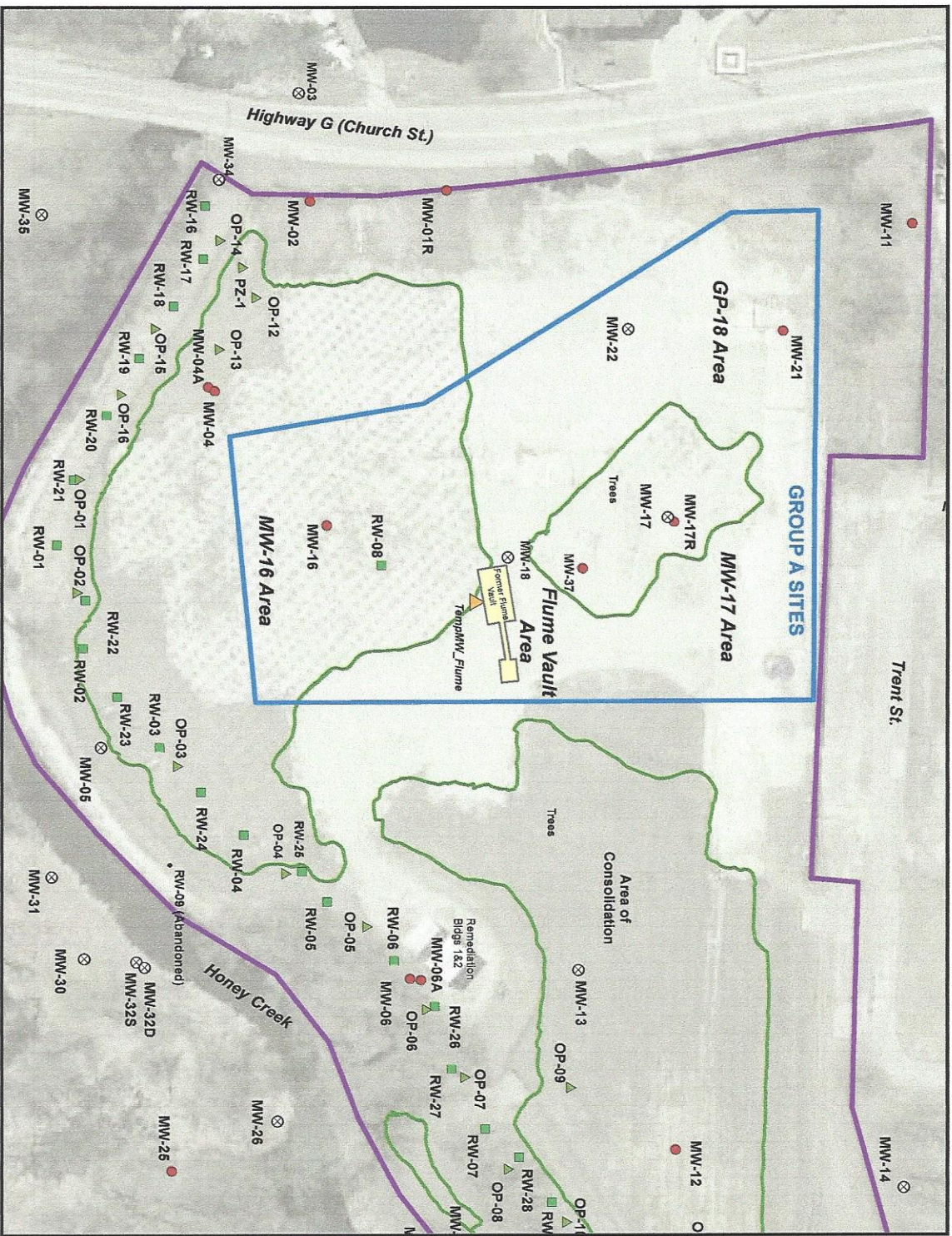
Contact Information

Legal Description for each Parcel:

Maps:

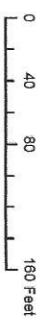
Factsheets:

RR 819, Continuing Obligations for Environmental Protection



Base Map: Aerial Photo, April 4, 2014, Google Earth

FIGURE B.3.d
MONITORING WELLS-GROUP A
FORMER TRENT TUBE PLANT 1



- Legend**
- Phytoremediation Areas
 - Monitoring Well
 - Abandoned MW
 - Recovery Well
 - Observation Probe
 - Temporary Monitoring Well (abandoned)
 - Trent Tube 1 Boundary



Continuing Obligations for Environmental Protection

Responsibilities of Wisconsin Property Owners

PUB-RR-819

November 2013

This fact sheet is intended to help property owners understand their legal requirements under s. 292.12, Wis. Stats., regarding continuing obligations that arise due to the environmental condition of their property.

The term “continuing obligations” refers to certain actions for which property owners are responsible following a completed environmental cleanup. They are sometimes called environmental land use controls or institutional controls. These legal obligations, such as a requirement to maintain pavement over contaminated soil, are most often found in a cleanup approval letter from the state.

Less commonly, a continuing obligation may apply where a cleanup is not yet completed but a cleanup plan has been approved, or at a property owned by a local government that is exempt from certain cleanup requirements.

What Are Continuing Obligations?

Continuing obligations are legal requirements designed to protect public health and the environment in regard to contamination that remains on a property.

Continuing obligations still apply after a property is sold. Each new owner is responsible for complying with the continuing obligations.

Background

Wisconsin, like most states, allows some contamination to remain after cleanup of soil or groundwater contamination (residual contamination). This minimizes the transportation of contamination and reduces cleanup costs while still ensuring that public health and the environment are protected.

The Department of Natural Resources (DNR), through its Remediation and Redevelopment (RR) Program, places sites or properties with residual contamination on a public database in order to provide notice to interested parties about the residual contamination and any associated continuing obligations. Please see the “Public Information” section on page 3 to learn more about the database. (Prior to June 3, 2006, the state used deed restrictions recorded at county courthouses to establish continuing obligations, and those deed restrictions have also been added into the database.)



Wisconsin Department of Natural Resources
P.O. Box 7921, Madison, WI 53707
dnr.wi.gov, search “brownfield”



Types of Continuing Obligations

1. Manage Contaminated Soil that is Excavated

If the property owner intends to dig up an area with contaminated soil, the owner must ensure that proper soil sampling, followed by appropriate treatment or disposal, takes place. Managing contaminated soil must be done in compliance with state law and is usually done under the guidance of a private environmental professional.

2. Manage Construction of Water Supply Wells

If there is soil or groundwater contamination and the property owner plans to construct or reconstruct a water supply well, the owner must obtain prior DNR approval to ensure that well construction is designed to protect the water supply from contamination.

Other Types of Continuing Obligations

Some continuing obligations are designed specifically for conditions on individual properties. Examples include:

- keeping clean soil and vegetation over contaminated soil;
- keeping an asphalt “cover” over contaminated soil or groundwater;
- maintaining a vapor venting system; and
- notifying the state if a structural impediment (e.g. building) that restricted the cleanup is removed. The owner may then need to conduct additional state-approved environmental work.

It is common for properties with approved cleanups to have continuing obligations because the DNR generally does not require removal of all contamination.

Property owners with the types of continuing obligations described above will find these requirements described in the state’s cleanup approval letter or cleanup plan approval, and *must*:

- comply with these property-specific requirements; and
- obtain the state’s permission before changing portions of the property where these requirements apply.

The requirements apply whether or not the person owned the property at the time that the continuing obligations were placed on the property.

Changing a Continuing Obligation

A property owner has the option to modify a continuing obligation if environmental conditions change. For example, petroleum contamination can degrade over time and property owners may collect new samples showing that residual contamination is gone. They may then request that DNR modify or remove a continuing obligation. Fees are required for DNR’s review of this request and for processing the change to the database (\$1050 review fee, \$300/\$350 database fee). Fees are subject to change; current fees are found in Chapter NR 749, Wis. Adm. Code, on the web at www.legis.state.wi.us/rsb/code/nr/nr749.pdf.

Public Information

The DNR provides public information about continuing obligations on the Internet. This information helps property owners, purchasers, lessees and lenders understand legal requirements that apply to a property. DNR has a comprehensive database of contaminated and cleaned up sites, *BRRTS on the Web*. This database shows all contamination activities known to DNR. Site specific documents are found under the *Documents* section. The information includes maps, deeds, contaminant data and the state's closure letter. The closure letter states that no additional environmental cleanup is needed for past contamination and includes information on property-specific continuing obligations. If a cleanup has not been completed, the state's approval of the remedial action plan will contain the information about continuing obligations.

Properties with continuing obligations can generally be located in DNR's *GIS Registry*, part of the *RR Sites Map*. RR Sites Map provides a map view of contaminated and cleaned up sites, and links to BRRTS on the Web.

If a completed cleanup is shown in *BRRTS on the Web* but the site documents cannot be found in the Documents section, DNR's closure letter can still be obtained from a regional office. For assistance, please contact a DNR Environmental Program Associate (see the RR Program's Staff Contact web page at dnr.wi.gov/topic/Brownfields/Contact.html).

BRRTS on the Web and
RR Sites Map are part of
CLEAN
(the Contaminated Lands
Environmental Action Network) at
dnr.wi.gov/topic/Brownfields/clean.html

Off-Site Contamination: When Continuing Obligations Cross the Property Line

An off-site property owner is someone who owns property that has been affected by contamination that moved through soil, sediment or groundwater from another property. Wisconsin law, s. 292.13, Wis. Stats., provides an exemption from environmental cleanup requirements for owners of "off-site" properties. The DNR will generally not ask off-site property owners to investigate or clean up contamination that came from a different property, as long as the property owner allows access to his or her property so that others who are responsible for the contamination may complete the cleanup.

However, off-site property owners are legally obligated to comply with continuing obligations on their property, even though they did not cause the contamination. For example, if the state approved a cleanup where the person responsible for the contamination placed clean soil over contamination on an off-site property, the owner of the off-site property must either keep that soil in place or obtain state approval before disturbing it.

Property owners and others should check the *Public Information* section above if they need to:

- determine whether and where continuing obligations exist on a property;
- review the inspection, maintenance and reporting requirements, and
- contact the DNR regarding changing that portion of the property. The person to contact is the person that approved the closure or remedial action plan.

Option for an Off-Site Liability Exemption Letter

In general, owners of off-site properties have a legal exemption from environmental cleanup requirements. This exemption does not require a state approval letter. Nonetheless, they may request a property-specific liability exemption letter from DNR if they have enough information to show that the source of the contamination is not on their property. This letter may be helpful in real estate transactions. The fee for this letter is \$700 under Chapter NR 749, Wis. Adm. Code. For more information about this option, please see the RR Program's Liability web page at dnr.wi.gov/topic/Brownfields/Liability.html.

Legal Obligations of Off-Site Property Owners

- Allow access so the person cleaning up the contamination may work on the off-site property (unless the off-site owner completes the cleanup independently).
- Comply with any required continuing obligations on the off-site property.

Required Notifications to Off-Site Property Owners

1. The person responsible for cleaning up contamination must notify affected property owners of any proposed continuing obligations on their off-site property **before** asking the DNR to approve the cleanup. This is required by law and allows the off-site owners to provide the DNR with any technical information that may be relevant to the cleanup approval.

When circumstances are appropriate, an off-site neighbor and the person responsible for the cleanup may enter into a "legally enforceable agreement" (i.e. a contract). Under this type of private agreement, the person responsible for the contamination may also take responsibility for maintaining a continuing obligation on an off-site property. This agreement would not automatically transfer to future owners of the off-site property. The state is not a party to the agreement and can not enforce it.

2. If a cleanup proposal that includes off-site continuing obligations is approved, DNR will send a letter to the off-site owners detailing the continuing obligations that are required for their property. Property owners should inform anyone interested in buying their property about maintaining these continuing obligations. For residential property, this would be part of the real estate disclosure obligation.

More Information

For more information, please visit the RR Program's Continuing Obligations web site at dnr.wi.gov/topic/Brownfields/Residual.html.

For more information about DNR's Remediation and Redevelopment Program, see our web site at dnr.wi.gov/org/aw/rr/. This document contains information about certain state statutes and administrative rules but does not include all of the details found in the statutes and rules. Readers should consult the actual language of the statutes and rules to answer specific questions.

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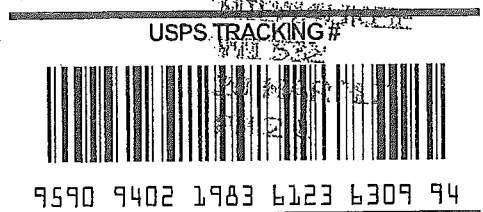
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