FIFTH FIVE-YEAR REVIEW REPORT FOR BETTER BRITE PLATING CO. CHROME AND ZINC SHOPS SUPERFUND SITE BROWN COUNTY, WISCONSIN

Prepared by

U.S. Environmental Protection Agency
Region 5
Chicago, Illinois

11/18/2019

X Joan Tanaka, for

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Signed by: Environmental Protection Agency

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LIST OF ABBREVIATIONS & ACRONYMS

BRRTS	Bureau for Remediation and Redevelopment Tracking System
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFR	Code of Federal Regulations
CO	Continuing Obligation
COC	Contaminant of Concern
CSF	Cancer slope factor
EPA	United States Environmental Protection Agency
ES	Enforcement Standard
FYR	Five-Year Revie
ICs	Institutional Controls
ICIAP	Institutional Control Implementation Assurance Plan
LTS	Long-Term Stewardship
NCP	National Oil and Hazardous Substances Pollution Contingency Plan
NPL	National Priorities List
O&M	Operation and Maintenance
OU	Operable Unit
PAL	Preventive Action Limit
PCOR	Preliminary Close Out Report
PFOA	Perfluorooctanoic acid
PFOS	Perfluorooctane sulfonate
PPB	parts per billion
RAO	Remedial Action Objectives
RAS	Remedial Action Standard
RfD	Reference Dose
ROD	Record of Decision
RPM	Remedial Project Manager
Site	Better Brite Plating Co. Chrome and Zinc Shops Superfund Site
UU/UE	Unlimited Use and Unrestricted Exposure
VOC	Volatile Organic Compound
WAC	Wisconsin Administrative Code
WDNR	Wisconsin Department of Natural Resources

I. INTRODUCTION

The purpose of a Five-Year Review (FYR) is to evaluate the implementation and performance of a remedy in order to determine if the remedy is and will continue to be protective of human health and the environment. The methods, findings, and conclusions of reviews are documented in FYR reports such as this one. In addition, FYR reports identify issues found during the review, if any, and document recommendations to address them.

The United States Environmental Protection Agency (EPA) is preparing this FYR pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 121, consistent with the National Contingency Plan (NCP) (40 CFR Section 300.430(f)(4)(ii)) and considering EPA policy.

This is the fifth FYR for the Better Brite Plating Co. Chrome and Zinc Shops (Better Brite or Site) Superfund Site. The triggering action for this statutory FYR was the signing of the previous FYR on November 18, 2014. The FYR has been prepared due to the fact that hazardous substances, pollutants, or contaminants remain at the site above levels that allow for unlimited use and unrestricted exposure (UU/UE).

The Site consists of two Operable Units (OUs), both of which will be addressed in this FYR. OU1 and OU2 address the entire site but were designated as separate OUs for administrative purposes, OU1 was the implementation of an interim Record of Decision (ROD) in 1991, and OU2 was the final ROD signed on September 24, 1996.

The Better Brite Site FYR was led by Lauren McCarrell, EPA Remedial Project Manager (RPM). Participants included Susan Pastor, EPA Community Involvement Coordinator, and Keld Lauridsen, Wisconsin Department of Natural Resources (WDNR) RPM. EPA and WDNR are the lead agencies for developing and implementing the remedy for the Site. WDNR has reviewed all supporting documentation and provided input to EPA during the FYR process. The review began on 11/20/2018.

Site Background

The Better Brite Site is located in the City of De Pere, Brown County, Wisconsin. The Site consists of two separate properties: The Better Brite Zinc Shop and the Better Brite Chrome Shop (see Figure 1 in Appendix C). These two properties were listed as one site on the National Priorities List (NPL) August 30, 1990 (Federal Register 35502- 35512/Vol.55, No. 169) due to similarities in contaminants, site history, and ownership.

The Better Brite Plating Company began operations at the Zinc Shop in the late 1960s and was primarily engaged in plating 15-20-foot rollers for paper mills in the area. By 1978, chrome plating operations began at the Chrome Shop, and operations at the Zinc Shop were converted to zinc plating only. Vertical in-ground dip tanks were used for chromium plating operations. Known chemicals used include muriatic acid, sodium hypochlorite, degreasers containing VOCs, chromic acid, and sodium cyanide solutions.

Operational practices were poor. Numerous complaints from neighbors and employees regarding spills and dumping prompted initial investigations by WDNR in 1979. Limited site investigations and remedial efforts were conducted during the 1980s. The Better Brite Plating Company filed for bankruptcy protection and discontinued operations at the Chrome Shop in 1985, but operations continued at the Zinc Shop until 1989. Investigations found that vertical tanks at the Chrome Shop had

leaked between 20,000 and 60,000 gallons of chrome plating solution while the plant was in operation. Early investigations discovered high concentrations of chromium, zinc, cadmium, and cyanide in stored waste, surface water, and soil samples.

Both the Chrome and Zinc Shop properties are located in a mixed residential/commercial area situated approximately a quarter mile west of the Fox River. Land use is expected to remain the same in the foreseeable future. Several homes directly border both properties, with the nearest residence located across the street to the south of the Zinc Shop property. Approximately seven single-family residences are adjacent to the Chrome Shop property. Commercial operations nearby include a foundry on South Sixth Street, a heating and air conditioning contractor, and a resale shop adjacent to the Zinc Shop.

According to the Final Design report (HIS Geotrans, December 3, 1998), an estimated 46,000 people obtained drinking water from municipal wells within three miles of the Better Brite Site. The City of De Pere had six municipal wells, but as of 2007 the city uses Lake Michigan water. One municipal well was located 250 feet northwest of the Zinc Shop but was abandoned. A 1991 door-to-door survey located five unused and two used private wells near the site, but these wells were abandoned according to the City of De Pere. The private wells drew water from the dolomite or the sandstone formations.

FIVE-YEAR REVIEW SUMMARY FORM

SITE IDENTIFICATION		
Site Name: Better Brite Plating Company Chrome and Zinc Shops		
EPA ID: WIT560010118		
Region: 5	**State:** WI	**City/County:** De Pere/Brown
SITE STATUS		
NPL Status: Final		
Multiple OUs? Yes	**Has the site achieved construction completion?** Yes	
REVIEW STATUS		
Lead agency: EPA		
Author name (Federal or State Project Manager): Lauren McCarrell		
Author affiliation: U.S. EPA Region 5		
Review period: 11/20/2018 - 8/13/2019		
Date of site inspection: 5/14/2019		
Type of review: Statutory		
Review number: 5		
Triggering action date: 11/18/2014		
Due date *(five years after triggering action date)*: 11/18/2019		

II. RESPONSE ACTION SUMMARY

Basis for Taking Action

Hazardous substances have been released at the Better Brite Site. These substances include volatile organic compounds (VOCs), cyanide, and metals, especially chromium and hexavalent chromium. Exposure through direct contact, inhalation and ingestion to soil and groundwater contaminated with site contaminants of concern (COCs) posed risks to human health. An ecological risk assessment was not conducted because this is primarily a groundwater remedy and soil contamination was removed through removal actions or stabilized under a cap. Soil removal took place as an initial response action to respond to the immediate threat to human health posed by contaminated soils at both the Chrome and Zinc Shop properties. Soil was removed from the properties in 1993 and soil stabilization activities at the Chrome Shop property were conducted in 1999.

Response Actions

Initial Response

The imminent public health threats at the Better Brite Site were addressed between 1980 and 1995 through WDNR enforcement actions and EPA removal actions. These resulted in the disposal of all containerized waste, contaminated debris, and shallow contaminated soil; construction of fencing; placement of clean soil over the remaining contaminated soil; and construction and operation of a groundwater extraction and treatment system.

Chrome Shop

From 1979-1990, ongoing investigations and litigation by WDNR resulted in limited measures to remove or contain contamination. EPA prepared a response plan in 1979, which the Better Brite Plating Company implemented, including excavation of a groundwater collection trench, installation of surface water controls and groundwater monitoring wells, and limited soil removal. Groundwater from the collection trench was discharged to a City of De Pere sanitary sewer. Following the 1985 bankruptcy, the Chrome Shop building was demolished and removed, the holding pond was excavated, and the former building area was capped with clay. In April 1986, EPA removed four subsurface plating tanks from the Chrome Shop property. In September 1986, EPA prepared a Site Assessment and Emergency Action Plan, which concluded that the Chrome Shop property area posed an immediate threat to human health. From September 1986 to April 1987, EPA completed actions that removed 83 tons of contaminated soil, 9,279 gallons of chromic acid, 3,600 gallons of caustic liquid, 550 gallons of cyanide solution, 150 pounds of cyanide sludge, and 500 gallons of flammable liquid.

The Better Brite Plating Company discontinued pumping from the collection trench in 1986. As a result, chromium contaminated surface water began collecting in nearby yards. As an interim measure in March 1988, EPA started pumping from the collection trench and discharging waste to the sanitary sewer. In 1990, EPA built a 2,000 gallon per day system to treat groundwater prior to discharging to the sanitary sewer, and initiated pumping from a recovery well in addition to the collection trench. In 1993, EPA replaced the recovery well and groundwater collection trench with an engineered groundwater collection sump.

As part of EPA's ongoing removal action, EPA excavated and removed approximately 10,000 tons of contaminated soil, concrete, and debris in 1993. Contaminated surface soil was excavated from the Chrome Shop property, and some from adjacent properties. A smaller area was excavated to a depth of 20 feet, where sampling indicated that soils outside of and below the excavated area was not contaminated. The excavated area was subsequently filled with clean soil.

Zinc Shop

In October 1989, EPA performed a site assessment at the Zinc Shop. The assessment confirmed WDNR's discovery of contamination and illegally stored hazardous substances. Based on the results of the site assessment, EPA conducted a removal action from December 27, 1989 to October 22, 1993 that entailed sampling and sorting hazardous materials; securing, decontaminating, and heating the building; removing waste, and compiling the analytical results from previous investigations.

In 1990 as part of the removal action, EPA constructed a groundwater recovery sump along the east side of the building. Contaminated groundwater from the sump was trucked to the Chrome Shop for pretreatment. Approximately 350 cubic yards of chromium contaminated soil was excavated during installation of the sump. In 1991, EPA conducted additional decontamination of the building and investigated beneath the concrete slab foundation. The original sump was replaced with a larger sump following further excavation in 1993. Until the fall of 1999, contaminated groundwater was regularly extracted from the sump and trucked to the Chrome Shop for treatment.

The Zinc Shop burned down in September 1992. From November 1992 to January 1993, EPA removed the remains of the building, the slab foundation, and two 15-foot long vertical in-ground dip tanks as part of the ongoing removal action. Contaminated soil was excavated from beneath the foundation until clean soil was reached. Approximately 6,032 tons of chromium contaminated soil, concrete, and building debris were removed from the Site.

Remedy Selection

On June 28, 1991, EPA issued an interim ROD that required the following:

- Expand the operation of the treatment facility in order to meet the pretreatment standards set by the City of De Pere's publicly owned treatment works;
- Improve surface water drainage and modify the groundwater collection system to prevent contamination leaving the area;
- Secure the site with fencing and siding material to prevent contact with contaminated soil and debris; and
- Install monitoring wells to serve as an early detection system for a nearby municipal well and monitor potential contamination within the deep aquifer.

On September 24, 1996, EPA issued a ROD for the final remedial action at the Site. This ROD added the following requirements:

- Extract and treat groundwater from the sump at the Zinc Shop;
- Relocate the treatment plant from the Chrome Shop to the Zinc Shop;
- Stabilize hexavalent chromium in soil and groundwater to prevent further migration;

- Construct new exterior foundation drains at two properties near the Zinc Shop and pump collected water to the treatment facility. If necessary, any additional soil contamination found near the Zinc Shop will be removed, treated and disposed of;
- Continue groundwater monitoring at the Chrome Shop and Zinc Shop to evaluate the effectiveness of the remedial action; and
- Implement Institutional Controls (ICs) and site access restrictions such as deed restrictions placed on the Zinc and Chrome Shop properties to prevent activities that could affect the remedy, including subsurface excavation and water well installation.

Implementation of the 1991 interim ROD and the 1996 final ROD were treated as separate OUs, OU1 and OU2, respectively, for administrative purposes.

Remedial Action Objectives (RAOs) were developed for the Site to address groundwater and soil contamination. The RAOs listed in the ROD include:

- Prevent migration of contaminants in groundwater, and in the long term to remediate the groundwater to protect human health and the environment, and to meet state and federal standards; and
- Prevent human exposure to contaminated soils and groundwater that pose unacceptable risks.

The 1996 ROD Summary included an assessment of the remaining risks from groundwater contamination. EPA and WDNR concluded that WAC NR 140 Enforcement Standards (ESs) and Preventive Action Limits (PALs) provide sufficient protection of public health for residential groundwater use. The remedy is intended to achieve compliance with PALs for all COCs at the Better Brite site. The COCs identified in 1996 ROD include:

Chrome Shop COCs:

Contaminant	PAL in parts per billion (ppb)
Inorganics	
Aluminum	NA
Antimony	1.2
Arsenic	1
Beryllium	0.4
Cadmium	0.5
Calcium	NA
Cobalt	8
Chromium	10
Hexavalent Cr	NA
Iron	150*
Magnesium	NA
Manganese	60
Nickel	20
Potassium	NA
Silver	10
Thallium	0.4
Vanadium	6

VOCs	
Carbon Disulfide	200
1,1-Dichloroethene	0.7
Tetrachloroethene	0.5
1,1,1-Trichloroethane	40
Trichloroethene	0.5

Notes: * = Public Welfare Standard
NA = Not Available

Zinc Shop COCs:

Contaminant	PAL in parts per billion (ppb)
Inorganics	
Aluminum	NA
Antimony	1.2
Beryllium	0.4
Calcium	NA
Cobalt	8
Chromium	10
Hexavalent Cr	NA
Cyanide	40
Iron	150*
Lead	1.5
Magnesium	NA
Manganese	60
Nickel	20
Potassium	NA
Sodium	NA
Thallium	0.4
Vanadium	6
VOCs	
Carbon Disulfide	200
Carbon Tetrachloride	0.5
1,2-Dichloroethane	0.5
1,1,2-Trichloroethane	0.5

Notes: * = Public Welfare Standard
NA = Not Available

Chromium (both total and hexavalent) at the Chrome Shop property, and chromium (both total and hexavalent), cyanide, and nickel at the Zinc Shop property, were identified as the primary inorganic contaminants. VOCs were detected in excess of NR 140 PALs at both the Chrome and Zinc Shop properties, but the VOC contaminant plume was found to be limited to the respective property areas.

Status of Implementation

Activities from the interim ROD and removal activities were concluded prior to the implementation of the final 1996 ROD. The remedy is still ongoing for OU2 or the final ROD for the Better Brite site. The remedial design, construction and Operation and Maintenance (O&M) for the final ROD have been

conducted by WDNR under a cooperative agreement with EPA. Sampling, treatability, design, and construction oversight were performed by HIS Geotrans under a contract with WDNR. WDNR selected RMT, Inc. to perform construction of the remedy. The sampling, treatability, and design work for the remedial actions are summarized in the Final Design Report.

EPA and WDNR have determined that chromium is the primary COC in groundwater at both the Zinc Shop and Chrome Shop properties. A large percentage of the chromium was present in the form of hexavalent chromium, also the most mobile and toxic form of chromium. The current Remedial Action Standard (RAS) for chromium is the WAC NR 140 PAL: 10 parts per billion (ppb).

Chrome Shop

Construction activities began at the Better Brite Site on August 23, 1999. The area with groundwater impacted by hexavalent chromium at the Chrome Shop was stabilized by adding a chemical reductant to the soil to a depth of 20 feet. Approximately 15,000 cubic yards of soil were treated. The mixing was performed primarily using a backhoe with a rototiller type attachment. The treated soil was field tested and stockpiled after field tests indicated that treatment was sufficient. After final treatment, all the chromium leaching results were less than the PAL (10 ppb). Soil stabilization at the Chrome Shop property was completed on October 29, 1999.

The treated soils were deposited and compacted back into the excavation. The appearance of the Chrome Shop property was restored, and the treated soil was protected from erosion and human contact by backfilling and grading in order to improve drainage, along with placement of topsoil, seeding and mulching. Approximately 1,080 cubic yards of topsoil were spread on the Chrome Shop property to provide a four-inch cover over the stabilized soil and staging areas. The area was then seeded and mulched, completing the soil stabilization at the Chrome Shop property. Each monitoring well is protected by a locked steel casing.

Zinc Shop

Relocation and restart of the groundwater recovery and treatment system at the Zinc Shop property was completed by the end of 1999. This included pumping groundwater from new exterior foundation drains at two nearby residences to the treatment system. Disturbed areas were restored and covered with four inches of topsoil or four inches of crushed aggregate and asphalt paving. Approximately 2,100 square feet were paved, and 45 cubic yards of topsoil were spread. A fence was installed around the Zinc Shop sump, and treatment facilities were enclosed within a locked building. Monitoring wells are protected by a locked steel casing. The removal of hexavalent chromium contaminated groundwater and subsequent pretreatment prior to discharge to the sanitary sewer is ongoing at the Zinc Shop property.

Institutional Controls

EPA conducted a review of the ICs and has determined that they are currently adequate to protect human health and the environment. As part of this FYR, EPA performed the following activities related to the IC evaluation:

- A preliminary review of the Environmental Protection Easement and Declaration of Restrictive Covenant dated April 14, 2010;
- A site inspection; and

- An evaluation of the effectiveness of the ICs.

Each area where ICs are necessary to assure protectiveness is identified in Table 1, below.

Table 1: Summary of Planned and/or Implemented ICs

Media, engineered controls, and areas that do not support UU/UE based on current conditions	ICs Needed	ICs Called for in the Decision Documents	Impacted Parcel(s)	IC Objective	Title of IC Instrument Implemented and Date (or planned)
Soil/Groundwater	Yes	Yes	Chrome Shop area of soil treatment owned by City of De Pere	Restrict groundwater use, soil excavation, and disturbing the cap.	• Municipal groundwater use restrictions (De Pere Municipal Code, Chapter 26, August 7, 2001). • Well drilling restrictions (De Pere Municipal Code, Chapter 26 & WAC NR# 812, effective February 1, 1991; renumbered NR#812 September 1994). • Restrictive covenants filed with Brown County, April 2010. • State of Wisconsin Continuing Obligation (CO) April 2010 (Statute 292.12). • WDNR Bureau for Remediation and Redevelopment Tracking System (BRRTS) database, April 2010 Wisconsin Statute 292.12(2)(c)).
			Chrome Shop area of soil treatment not owned by City of De Pere		
Groundwater	Yes	Yes	Zinc Shop area of groundwater contamination owned by the City	Requires connection to sewer and water system. Prohibits cross connections from the city water system and a private source. Requires a permit for private well installation. Requires abandonment of unused or previously abandoned wells. Requirements for new well construction and pump installation.	
			Zinc Shop area of groundwater contamination not owned by the City		

Status of Access Restrictions and ICs:

The City of De Pere assumed ownership of the Better Brite properties in 2001. City ownership and oversight by WDNR and EPA provide assurance that the remedial actions will be properly maintained, and that the contaminated areas will not be improperly developed in the future. The City has no plans to sell the Better Brite properties at this time. The portion of the Zinc Shop that is paved with asphalt is being leased by the City for parking. Currently, the City has no other plans for the Better Brite properties.

For the areas where the residual contamination that remains following a cleanup is above state standards[1], the State of Wisconsin, under the statutory authority of 292.12[2] has placed a continuing obligation (CO) on the property to ensure protection of human health and the environment. A CO is a legal requirement that applies to a property even after ownership changes. Information on COs can be found at:

https://dnr.wi.gov/topic/brownfields/residual.html

WDNR provides searchable online databases containing information on the investigation and cleanup of potential and confirmed contamination of soil and groundwater in the state of Wisconsin. In accordance with Wisconsin Statute 292.12(2)(c), the approved continuing obligations will be listed on a Continuing Obligation database, known as the Bureau for Remediation and Redevelopment Tracking System (BRRTS) at https://dnr.wi.gov/topic/Brownfields/botw.html, in order to provide public notice of residual contamination. Additionally, relevant requirements, limitations, or conditions imposed at the property will be listed in the database. Sites can also be viewed on the Remediation and Redevelopment Sites Map, which is a map view layer at the same web address. WDNR approval prior to well construction or reconstruction is required for all sites with residual contamination shown on the Continuing Obligation database, in accordance with WAC NR 812.09(4)(w). This requirement applies to private drinking water wells and high capacity wells. The BRRTS on the Web database allows people to search properties with the intent of purchasing land, governments planning redevelopment, businesses planning expansion, and well drillers. Information on the Chrome Shop property, including the CO Packet, can be found at:

https://dnr.wi.gov/botw/GetActivityDetail.do?detailSeqNo=32842#co

And information on the Zinc Shop property and the CO Packet can be found at:

https://dnr.wi.gov/botw/GetActivityDetail.do?detailSeqNo=32846

Wisconsin Statute 292.12 grants WDNR the authority to implement, require and enforce compliance with the requirements under Wisconsin Statute 292.12 and the rules promulgated under the statute. The continuing obligation regulations required under Wisconsin Statute 292.12 help ensure long-term

[1] Chapter 160 of the Wisconsin Statutes authorizes WDNR to set numerical Groundwater Protection Standards, and WAC NR 140 is the administrative rule that contains the standards themselves.

[2] Wisconsin Statute 292.12(2)(c), regarding Sites with Residual Contamination states that the WDNR may "impose limitations or other conditions related to property, in accordance with rules promulgated by the department, to ensure that conditions at the site remain protective of public health, safety, and welfare and the environment, and, as applicable, to promote economic development."

protection of public health and the environment in accordance with state laws and the required restrictions on groundwater use will meet the objectives of the remedy.

The City of De Pere's drinking water wells are no longer in operation, as the city now uses Lake Michigan water. The City of De Pere regulates all well construction, use, and abandonment within the city limits. Chapter 26 of the municipal code of De Pere includes the following requirements: if the building is adjacent to an installed water line, the owner is required to connect to the City water line; cross connections between City and private water supplies are prohibited; a permit is required for any well, constructed, installed, or maintained (the permit can be revoked if the well water is found to be contaminated); and, unused wells must be abandoned in accordance with WAC NR# 812. WAC NR 812 also prohibits installation of new wells within 1,200 feet of a hazardous waste treatment facility.

An Environmental Protection Easement and Declaration of Restrictive Covenant (restrictive covenant or covenant) was filed on April 14, 2010 on the affected properties owned by the City, a copy of which is provided in Appendix D. The covenant provides property use restrictions that will run with the land for purpose of protecting human health and the environment until such time as EPA and WDNR determine that no monitoring of any media within the Site is required. The following covenants, conditions, and restrictions apply to the use of the properties: 1) the prohibition of groundwater use for consumptive or other uses without prior approval from WDNR and EPA; 2) the prohibition to excavate soils or disturb the cap in the Chrome and Zinc Shop areas of the Site; and 3) the prohibition of excavating or grading of the land surface, filling on the capped area, plowing for agricultural cultivation, and construction or installation of a building or other structure with a foundation that would sit on or be placed within the cap or cover in the Chrome and Zinc Shop areas. There are no plans to pursue restrictive covenants on affected properties that are not owned by the city, because City and WDNR regulations should be effective in preventing residential groundwater use, and an agreement between the City of De Pere and WDNR will ensure notification to WDNR should construction permits be issued in the general area of either site. The State of Wisconsin's CO and listing on WDNR's BRRTS database provide an additional layer of protection for the Site.

Current Compliance:

Based on inspections and discussions with WDNR, EPA is not aware of Site or media uses which are inconsistent with the stated objectives to be achieved by the ICs. The remedy appears to be functioning as intended. No Site uses which are inconsistent with the implemented ICs or remedy IC objectives were noted during the Site inspection.

IC Follow up Actions Needed:

EPA will continue to evaluate the ICs and develop an Institutional Control Implementation Assurance Plan (ICIAP) or equivalent document that will include IC evaluation activities and the development of long-term stewardship procedures. The IC evaluation activities will include, as needed, updated maps depicting current conditions in areas that do not allow for UU/UE and conducting title work to ensure no prior encumbrances exist on the Site that are inconsistent with the ICs.

Long-Term Stewardship:

Since compliance with ICs is necessary to assure the protectiveness of the remedy, planning for long-term stewardship (LTS) is required to ensure that the ICs are maintained, monitored, and enforced so

that the remedy continues to function as intended. LTS involves assuring effective procedures are in place to properly maintain, monitor, and enforce ICs at the Site. The ICIAP will include procedures to ensure LTS such as regular inspection of the engineering controls and access controls at the Site and review of the ICs at the Site.

The ICIAP will also include a requirement for an annual certification by WDNR to EPA that ICs are in place and effective. Finally, development of a communications plan to provide routine remedy updates and use of the State's "one-call" system to receive notifications of dig sites in the vicinity of the remedial system/components should be explored by WDNR.

Systems Operations/Operation & Maintenance

EPA funded WDNR to perform the remedy at the Better Brite Site under a cooperative agreement until July 18, 2011, after which WDNR became solely responsible for financing O&M. The 1996 ROD predicted annual O&M costs of approximately $103,400. Current annual O&M costs are approximately $25,000 per year. O&M at the Better Brite Site includes running the groundwater treatment plant, disposal of treatment byproducts, and annual groundwater sampling and analysis. There are currently no substantive problems with system operation or environmental monitoring.

HIS Geotrans, a WDNR contractor, prepared a Quality Assurance Project Plan for Groundwater Monitoring, finalized September 28, 1998, and a Remedial Action Documentation Report, finalized February 21, 2000. Together these documents provide a plan for long-term monitoring, sampling, analysis, validation, health and safety, maintaining the grounds, and the content of monitoring reports. These documents function as an O&M plan for the remedies at the site and include the same procedures outlined in an O&M plan. Until March 31, 2009, the City of De Pere was responsible for O&M of the Zinc Shop groundwater removal system under an agreement with WDNR. O&M was performed by City of De Pere wastewater treatment staff. In April 2009, Foth Infrastructure and Environment (Foth) assumed responsibility for O&M under a contract with WDNR. Foth follows the procedures outlined in the previous O&M documents and has prepared a Better Brite Water Treatment Procedures document on July 21, 2011 to record the water treatment process at the Zinc Shop property.

III. PROGRESS SINCE THE LAST REVIEW

This section includes the protectiveness determinations and statements from the last FYR as well as the recommendations from the last FYR and the current status of those recommendations.

Table 2: Protectiveness Determinations/Statements from the 2014 FYR

OU #	Protectiveness Determination	Protectiveness Statement
1, 2, Sitewide	Short-term Protective	The Better Brite Site remedy currently protects human health and the environment in the short term. The groundwater extraction and treatment system began operating at the Zinc Shop in November of 1999 and is maintained by WDNR. A Preliminary Closeout Report (PCOR) for the Site was signed in February 2000. The Grant Street Municipal well, located 250 feet northwest of the Zinc Shop, has been abandoned and the City of

		De Pere now draws its drinking water from Lake Michigan. Groundwater quality and public health concerns are regularly assessed at both the Zinc and Chrome Shop properties. The groundwater plume is controlled by the extraction system at the Zinc Shop, and groundwater monitoring indicates exposure risks to neighboring property owners are within limits established under Wisconsin Administrative Code NR 140 Enforcement Standards (ESs) and Preventive Action Limits (PALs) at both the Zinc and Chrome Shop properties. The primary COC remaining above the RAS at the Better Brite Site is hexavalent chromium; however, soil stabilization at the Chrome Shop appears to have significantly lowered the concentrations of hexavalent chromium. WDNR will conduct environmental monitoring and operate the groundwater extraction and treatment system at the Zinc Shop until RASs are achieved. Further, ICs are in place to aid in achieving short-term protectiveness. In order for the remedy to be protective in the long term, a review of the ICs is needed to ensure that the remedy continues to function as intended and that effective procedures are in place for long-term stewardship of the Better Brite Site. An Institutional Control Implementation Assurance Plan (ICIAP) or equivalent document should be prepared and implemented.

Table 3: Status of Recommendations from the 2014 FYR

OU #	Issue	Recommendations	Current Status	Current Implementation Status Description	Completion Date (if applicable)
OU1, OU2	A review of the ICs is needed to ensure that the remedy continues to function as intended and that effective procedures are in place for long-term stewardship of the Better Brite Site.	Prepare and implement an ICIAP or equivalent document to ensure long-term stewardship.	Ongoing	All ICs required in the ROD as part of the response action to help ensure long-term protection have been put in place. EPA is still in the process of preparing an ICIAP or equivalent document to ensure long-term stewardship is maintained. It is expected that this will be completed by 12/31/2020 as reported in the issues/recommendations table in this FYR.	N/A
OU1, OU2	Concern about effectiveness of stabilization treatment and off-site migration of the hexavalent chromium contaminated	Further evaluate the effectiveness of the soil stabilization and the potential for off-site migration of hexavalent chromium	Ongoing	Groundwater contamination above the ES is still present within the area of soil stabilization. Nevertheless, contaminant concentrations have been significantly decreasing compared to historical groundwater concentrations	N/A

	groundwater at the Chrome Shop	contaminated groundwater at the Chrome Shop		within the soil stabilization area. Downgradient monitoring wells continue to show no signs of plume migration. Further evaluation of the effectiveness of soil stabilization and the potential for off-site migration of hexavalent chromium contaminated groundwater is ongoing through continued groundwater monitoring downgradient of the plume.	
OU1, OU2	Concerns about groundwater sampling procedures	Evaluate whether it is possible to collect groundwater samples using a low-flow sampling procedure and the advisability of field filtration	Completed	Both a bailer and low flow sampling techniques have been used to collect samples from the monitoring wells on Site. Similar results using either of the two sampling techniques indicates that the sampling method does not significantly impact the analytical results. WDNR has determined that field filtration for hexavalent chromium is not advisable. Because both sampling techniques indicate similar analytical results, a bailer will continue to be utilized for sample collection due to its reduced costs, however low flow sampling techniques will be used for wells where a standard bailer cannot freely go down well piping (wells W-1, W-1A and MW-2). Discussions regarding whether to collect groundwater samples using a low-flow sampling procedure for all wells should be continued once chromium levels are decreasing to levels close to the ES.	6/19/2019

IV. FIVE-YEAR REVIEW PROCESS

Community Notification, Involvement & Site Interviews

A public notice was published in the Green Bay Press Gazette on 12/21/2018, stating that there was a FYR and inviting the public to submit any comments to EPA (see Appendix G). No comments concerning the Better Brite site or the fifth FYR process were received during this period and no interviews were conducted by EPA. However, the RPM routinely discusses Site issues with WDNR

staff. The results of the review and the report will be made available at the Site information repository located at the Brown County Library, Kress Family Branch, 333 N. Broadway, De Pere, Wisconsin.

Data Review

This FYR consisted of a review of relevant documents including O&M records and monitoring data, previous FYRs, remedial investigation reports, and decision documents. Monitoring data was compared to applicable soil and groundwater cleanup standards, as identified in the September 24, 1996 ROD.

The primary COC remaining at the Better Brite Site above the RAS is hexavalent chromium (with a WAC NR 140 PAL of 10 ppb). Currently, monitoring wells MW-111, MW115, MW115A, and MW116 are sampled at the Chrome Shop property and monitoring wells W-1, W-1A, MW3R, MW-5, MW6, MW-9, MW-10 and the sump are sampled at the Zinc Shop property on an annual basis, except no wells were sampled in 2017 as a cost-savings measure implemented by WDNR. Well PF-MW-2 was also sampled at the Zinc Shop in 2015, 2016, and 2018. Maps showing the location of these wells are provided in Appendix H. Wisconsin groundwater ES exceedances for hexavalent chromium remain at both locations.

At the former Chrome Shop site (as of the most recent sampling in May 2019) the groundwater ES and PAL for hexavalent chromium were exceeded in monitoring well MW-116. The highest concentration detected during the review period (2015 to 2019) was in October 2015 at 16,500 ppb. Since 2015, hexavalent chromium concentrations have been decreasing from previous sampling events. In May 2019, hexavalent chromium was detected at a concentration of 9,800 ppb (down from a high of 54,000 ppb in May 2005). Groundwater samples were also analyzed for VOCs at MW-116. 1,1-Dichloroethene concentrations were detected above the ES and PAL with the highest concentration of 44.3 ppb in May 2019. Tetrachloroethene, 1,1,1-trichloroethane, and trichloroethene concentrations were detected above PALs throughout the review period, but below ESs. VOC groundwater monitoring results, including historical concentrations, are included in Appendix H.

Although groundwater contamination above ESs is still present within the area of soil stabilization, concentrations have been significantly decreasing compared to historical groundwater concentrations. Downgradient monitoring wells continue to show no signs of plume migration. The effectiveness of soil stabilization and the potential for off-site migration of hexavalent chromium contaminated groundwater will continue to be evaluated through groundwater monitoring downgradient of the plume.

At the former Zinc Shop site, from October 2015 through May 2019, the groundwater ES and PAL for hexavalent chromium was exceeded in monitoring wells:

- W-1 (4,400 ppb in May 2019, down from a high of 10,300 ppb in October 2015),
- W-1A (1,800 ppb in May 2019, down from a high of 3,300 ppb in October 2015),
- MW-3/MW3R (380 ppb in September 2016, decreased to 88 ppb in May 2019, down from a high of 3,500 ppb in June 2001)
- MW-5 (460 ppb in September 2016, not detected in May 2019, down from a high of 4,900 ppb in October 2006)
- MW-6 (3,500 ppb in September 2016, decreased to 1,200 ppb in May 2019, down from a high of 47,000 ppb in October 1994),

- MW-10 (10,300 ppb in October 2015, decreased to 1,500 ppb in May 2019, down from a high of 60,800 ppb in October 1994),
- The sump (14,000 in September 2016, decreased to 8,100 ppb in May 2019, down from 144,900 ppb in October 1994).

Groundwater samples were also analyzed for cyanide and VOCs at the sump location. The highest concentrations of cyanide detected during the review period was in October 2015 at 220 ppb. Since 2015, cyanide concentrations decreased and was detected at 100 ppb in May 2019. 1,1-Dichloroethene, tetrachloroethene, and 1,1,1-trichloroethane concentrations were detected above PALs in October 2015, but decreased below PALs in May 2019, except for 1,1-dichloroethene which decreased and was detected at 1.2 ppb.

The Zinc Shop sump and monitoring well data appear to indicate an overall decreasing trend in hexavalent chromium, cyanide, and VOCs during the review period and over the long-term in the source area, but concentrations of hexavalent chromium still far exceed the PALs. In order to reach concentrations below PALs per the ROD is likely to take an extended time frame.

The most recent summary of monitoring results, which includes historical results and a photographic survey of the monitoring wells, is provided in Appendix H. Other COCs were either below PALs or were not analyzed. During the Remedial Investigation, VOCs only exceeded PALs near the sumps and, therefore, were only sampled at discrete locations at MW-116 and the Zinc shop sump. The data has consistently indicated that the total chromium in groundwater is mostly, if not all, hexavalent chromium, and the other COCs identified in the ROD are not the focus of the remedy.

Site Inspection

The inspection of the Site was conducted on 5/14/2019. In attendance were Lauren McCarrell, EPA, Keld Lauridsen, WDNR, and Nick Glander, Foth Infrastructure and Environment. The purpose of the inspection was to assess the protectiveness of the remedy. The Site Inspection Checklist is included as Appendix E, and the inspection photo log is included in Appendix F.

The inspection team examined the groundwater extraction and treatment system at 315 S. Sixth Street and the overall condition of the Better Brite Site. The groundwater extraction, collection, and treatment equipment were all in good condition and functioning properly. The sump fencing, treatment facility building, and monitoring wells all appeared to be in good condition and were properly secured/locked. The Chrome Shop property is currently an open field maintained by the City of De Pere. No erosion damage was observed. Since the last FYR, the resale shop adjacent to the Zinc Shop constructed an addition expanding the building north in the parking lot area, abutting well MW-10. The resale shop also expanded the parking lot west to Sixth Street, south of the extraction and treatment building. Construction activities were completed in accordance with the restrictive covenant filed with Brown County. These expansions did not appear to disturb the effectiveness of the soil cap or result in the damage of any Site monitoring wells. The additional asphalt parking lot further protects human exposure from soil or water contamination. EPA did not observe any significant issues impacting current or future protectiveness of the remedy during the site inspection.

V. TECHNICAL ASSESSMENT

QUESTION A: Is the remedy functioning as intended by the decision documents?

Yes.

The Site inspection and current review of data, documents, Applicable or Relevant and Appropriate Requirements, and risk assumptions, indicate that the remedy is functioning as intended by the ROD. The only COC remaining above the RAS at the Better Brite Site is hexavalent chromium, and soil stabilization at the Chrome Shop property appears to have significantly lowered the concentrations of hexavalent chromium.

Cleanup levels are on the path to being achieved, however there is some concern about the effectiveness of stabilization treatment and off-site migration of the hexavalent chromium contaminated groundwater at the Chrome Shop. As discussed in the Data Review section, the current remedy to reduce hexavalent chromium concentrations below the RAS will likely take an extended time frame. The ROD states the selected remedy is expected to take a very extended time period, but also refers to FYRs to assess whether newly developed technologies exist to achieve NR 140 WAC standards. Additional actions may be needed to address these concerns, and new opportunities or technologies may exist to improve remedy performance and significantly shorten the time frame to achieve cleanup levels.

System operations appear to be working in a manner that will continue to maintain the effectiveness of the remedy and costs remain significantly below predictions from the 1996 ROD. Access controls (fencing) at the Site were not required by the ROD and are not necessary because all potential routes of exposure to contaminated soil have been eliminated. Restrictive covenants placed on property owned by the City of De Pere, and State and local controls on the installation of water supply wells, prevent risks from residential groundwater use. An ICIAP or equivalent document should be developed to ensure that LTS procedures are developed and implemented so that ICs are properly maintained, monitored, and enforced.

QUESTION B: Are the exposure assumptions, toxicity data, cleanup levels, and RAOs used at the time of the remedy selection still valid?

No.

The exposure assumptions used to assess Site risks included both current exposures and potential future exposures. There have been no changes in the toxicity factors for the COCs that were used in the baseline risk assessment. The assumptions are conservative and reasonable in evaluating risk and developing risk-based cleanup levels. No changes to these assumptions or the cleanup levels developed for them are warranted, and there has been no change to the standardized risk assessment methodology that could affect the protectiveness of the remedy.

There may be some changes related to exposure pathways and new contaminants. Perfluorooctanoic acid (PFOA), perfluorooctane sulfonate (PFOS) and other perfluoroalkyl substances (together, PFASs) are a class of man-made chemicals that have been widely used as a surfactant, wetting agent, and mist suppressing agent for chrome plating. PFAS use for second generation wetting agent fume suppressant was first reported in the chromium plating industry in 1954. Numerous sites are known to have environmental media with PFAS contamination from metal plating and finishing operations. On May

19, 2016, EPA's Office of Water published health advisories for PFOA and PFOS to provide water systems, and state, tribal, and local officials, with information on the health risk of these chemicals. The health advisories are not regulations and EPA does not have national drinking water regulations for PFOA or PFOS. The final Health Effects Support Documents for PFOS and PFOA publish an oral non-cancer toxicity value, or Reference Dose (RfD), of $2x10^{-5}$ mg/kg-day for both PFOS and PFOA. The Health Effects Support document for PFOA also derived a cancer slope factor (CSF) of 0.07 mg/kg/day. The PFOA and PFOS RfDs and the PFOA CSF were approved for use at Superfund sites to ensure protection of human health. PFOA/PFOS have not yet been evaluated as potential COCs at the Site. EPA recommends that PFOA/PFOS be evaluated as potential COCs and whether further investigation is necessary to characterize these contaminants.

As discussed in the Site Inspection section above, the resale shop expanded their building and the asphalt parking lot at the Zinc Shop. This expansion does not change any of the exposure pathways at the Site, and furthermore protects human exposure from soil or water contamination.

QUESTION C: Has any other information come to light that could call into question the protectiveness of the remedy?

No.

No new ecological risks have been identified, there have been no impacts from natural disasters, and no other information has come to light that could affect the protectiveness of the remedy.

VI. ISSUES/RECOMMENDATIONS

Issues and Recommendations Identified in the Five-Year Review:

OU(s): 1, 2	**Issue Category: Institutional Controls**			
	Issue: A review of the ICs is needed to ensure that the remedy continues to function as intended and that effective procedures are in place for long-term stewardship of the Better Brite Site.			
	Recommendation: Prepare and implement an ICIAP or equivalent document to ensure long-term stewardship.			
Affect Current Protectiveness	**Affect Future Protectiveness**	**Party Responsible**	**Oversight Party**	**Milestone Date**
No	Yes	EPA/State	EPA	12/31/2020

OU(s): 1,2	**Issue Category: Remedy Performance**
	Issue: Concern about effectiveness of stabilization treatment and off-site migration of the hexavalent chromium contaminated groundwater at the Chrome Shop.

	Recommendation: Further evaluate the effectiveness of the soil stabilization and the potential for off-site migration of hexavalent chromium contaminated groundwater at the Chrome Shop.			
Affect Current Protectiveness	**Affect Future Protectiveness**	**Party Responsible**	**Oversight Party**	**Milestone Date**
No	Yes	EPA/State	EPA/State	11/30/2021

OU(s): 1,2	**Issue Category: Monitoring**			
	Issue: PFOA/PFOS have not been evaluated as potential contaminants of concern.			
	Recommendation: Determine if PFOA/PFOS are potential contaminants of concern and whether further investigation is necessary to characterize the contaminants.			
Affect Current Protectiveness	**Affect Future Protectiveness**	**Party Responsible**	**Oversight Party**	**Milestone Date**
No	Yes	EPA/State	EPA/State	12/31/2020

OTHER FINDINGS

In addition, the following are recommendations that were identified during the FYR and may accelerate site close out and improve O&M, but do not affect current nor future protectiveness:

- In addition to the concerns about the effectiveness of the stabilization remedy and its continuing impact to groundwater concentrations, the RAO "to remediate the groundwater to protect human health and the environment and to meet state and federal standards" per the ROD is likely to take an extended time frame. Evaluate newly developed technologies and opportunities to improve remedy performance that may significantly shorten the time frame to achieve the RAOs. EPA recommends completing a Site-wide Remedy Optimization Review of the present remedy to determine what can be done, if anything, to address the goal of achieving state and federal standards in a reasonable time frame.
- Update O&M and Monitoring plans with the decision to include a re-evaluation of whether to collect groundwater samples using a low-flow sampling procedure once chromium levels are decreased to levels close to the ESs

VII. PROTECTIVENESS STATEMENT

Protectiveness Statement(s)	
Operable Unit: *1*	*Protectiveness Determination:* Short-term Protective

Protectiveness Statement:
The Better Brite Site remedy currently protects human health and the environment. All immediate threats to human health and the environment have been controlled. Exposure pathways that could result in unacceptable risks are being monitored and controlled through the annual monitoring of groundwater via the long-term monitoring network at the Site. However, in order for the remedy to be protective in the long term, the following actions need to be taken to ensure protectiveness: develop and implement long-term stewardship procedures for monitoring and tracking compliance with existing ICs by developing an ICIAP or equivalent document for the Site; evaluate the effectiveness of the soil stabilization and the potential for off-site migration of hexavalent chromium contaminated groundwater at the Chrome Shop; and, determine if PFOA/PFOS are potential contaminants of concern and whether further investigation is necessary to characterize these contaminants.

Protectiveness Statement(s)

Operable Unit:	*Protectiveness Determination:*
2	Short-term Protective

Protectiveness Statement:
The Better Brite Site remedy currently protects human health and the environment. All immediate threats to human health and the environment have been controlled. Exposure pathways that could result in unacceptable risks are being monitored and controlled through the annual monitoring of groundwater via the long-term monitoring network at the Site. However, in order for the remedy to be protective in the long term, the following actions need to be taken to ensure protectiveness: develop and implement long-term stewardship procedures for monitoring and tracking compliance with existing ICs by developing an ICIAP or equivalent document for the Site; evaluate the effectiveness of the soil stabilization and the potential for off-site migration of hexavalent chromium contaminated groundwater at the Chrome Shop; and, determine if PFOA/PFOS are potential contaminants of concern and whether further investigation is necessary to characterize these contaminants.

Sitewide Protectiveness Statement

Protectiveness Determination:
Short-term Protective

Protectiveness Statement:
The Better Brite Site remedy currently protects human health and the environment. All immediate threats to human health and the environment have been controlled. Exposure pathways that could result in unacceptable risks are being monitored and controlled through the annual monitoring of groundwater via the long-term monitoring network at the Site. However, in order for the remedy to be protective in the long term, the following actions need to be taken to ensure protectiveness: develop and implement long-term stewardship procedures for monitoring and tracking compliance with existing ICs by developing an ICIAP or equivalent document for the Site; evaluate the effectiveness of the soil stabilization and the potential for off-site migration of hexavalent chromium contaminated groundwater at the Chrome Shop; and, determine if PFOA/PFOS are potential contaminants of concern and whether further investigation is necessary to characterize these contaminants.

VIII. NEXT REVIEW

The next FYR report for the Better Brite Superfund Site is required five years from the completion date of this review.

APPENDIX A – REFERENCE LIST

Record of Decision, EPA, 6/28/1991. SEMS Document 180766

Superfund State Contract for an Interim Remedial Action at the Better Brite Plating Co. Chrome and Zinc Shop Site between the State of Wisconsin and the U.S. Environmental Protection Agency, EPA, 7/16/1991. SEMS Document 901365

Record of Decision, EPA, 9/24/1996. SEMS Document 180759

First Five-Year Review, EPA, 11/23/1999. SEMS Document 149716

Preliminary Closeout Report, EPA, 2/8/2000. SEMS Document 347869

Second Five-Year Review, EPA, 11/23/2004. SEMS Document 224718

Third Five-Year Review, EPA, 11/20/2009. SEMS Document 342705

Final Design Report, HIS GeoTrans, WDNR, 9/28/1998. SEMS Document 386123

Environmental Protection Easement and Declaration of Restrictive Covenants, City of De Pere, WDNR, 4/14/2010. BRRTS #: 02-05-000030/02-05-000031

Better Brite Water Treatment Procedures, Foth Infrastructure & Environment, LLC, WDNR, 7/21/2011.

Fourth Five-Year Review, EPA, 11/18/2014. SEMS Document 482270

Superfund Property Reuse Evaluation Checklist for Reporting the Sitewide Ready-for-Anticipated Use GPRA Measure, EPA, 4/14/2015. SEMS Document 485601

Summary of the October 22, 2015 Groundwater Sampling Events at the Former Better Brite Chrome and Zinc Shops, OMNNI Associates, Inc., WDNR, 11/9/2015.

Summary of the September 19 & 20, 2016 Groundwater Sampling Events at the Former Better Brite Chrome and Zinc Shops, OMNNI Associates, Inc., WDNR, 10/10/2016.

Annual Treatment Summary, Foth Infrastructure & Environment, LLC, WDNR, 4/30/2018

Summary of the June 12 & 13, 2018 Groundwater Sampling Events at the Former Better Brite Chrome and Zinc Shops, OMNNI Associates, Inc., WDNR, 8/21/2018.

Summary of the May 14 & 15, 2019 Groundwater Sampling Events at the Former Better Brite Chrome and Zinc Shops, OMNNI Associates, Inc., WDNR, 6/28/2019.

BRRTS website for the Chrome Shop: https://dnr.wi.gov/botw/GetActivityDetail.do?detailSeqNo=32842#co

BRRTS website for the Zinc Shop: https://dnr.wi.gov/botw/GetActivityDetail.do?detailSeqNo=32846

APPENDIX B

Site Chronology

Site Chronology

Event	Date
Initial discovery of problem or contamination	1979
Proposed for NPL	October 26, 1989
Final NPL listing	August 30, 1990
Fund-lead Removal actions	October 1986 and October 1993
State-lead Remedial Investigation/Feasibility Study completed	September 1995
Interim ROD signature	June 28, 1991
Final ROD signature	September 24, 1996
Remedial design complete	December 3, 1998
Superfund State Contract, Cooperative Agreement, or Federal Facility Agreement signature	July 16, 1991
On-site remedial action construction start	August 23, 1999
First Five-Year Review	November 23, 1999
Construction completion date (EPA issued Preliminary Closeout Report)	February 8, 2000
Second Five-Year Review	November 23, 2004
Third Five-Year Review	November 20, 2009
Restrictive covenant filed with Brown County	April 14, 2010
Zinc Shop groundwater removal and treatment system upgraded	2011
End of Cooperative Agreement to perform remedy O&M between EPA and WDNR	July 18, 2011
Fourth Five-Year Review	November 11, 2014
Site-Wide Ready for Anticipated Use Determination	April 14, 2015

APPENDIX C

Site Maps

Figure 1: Site Map

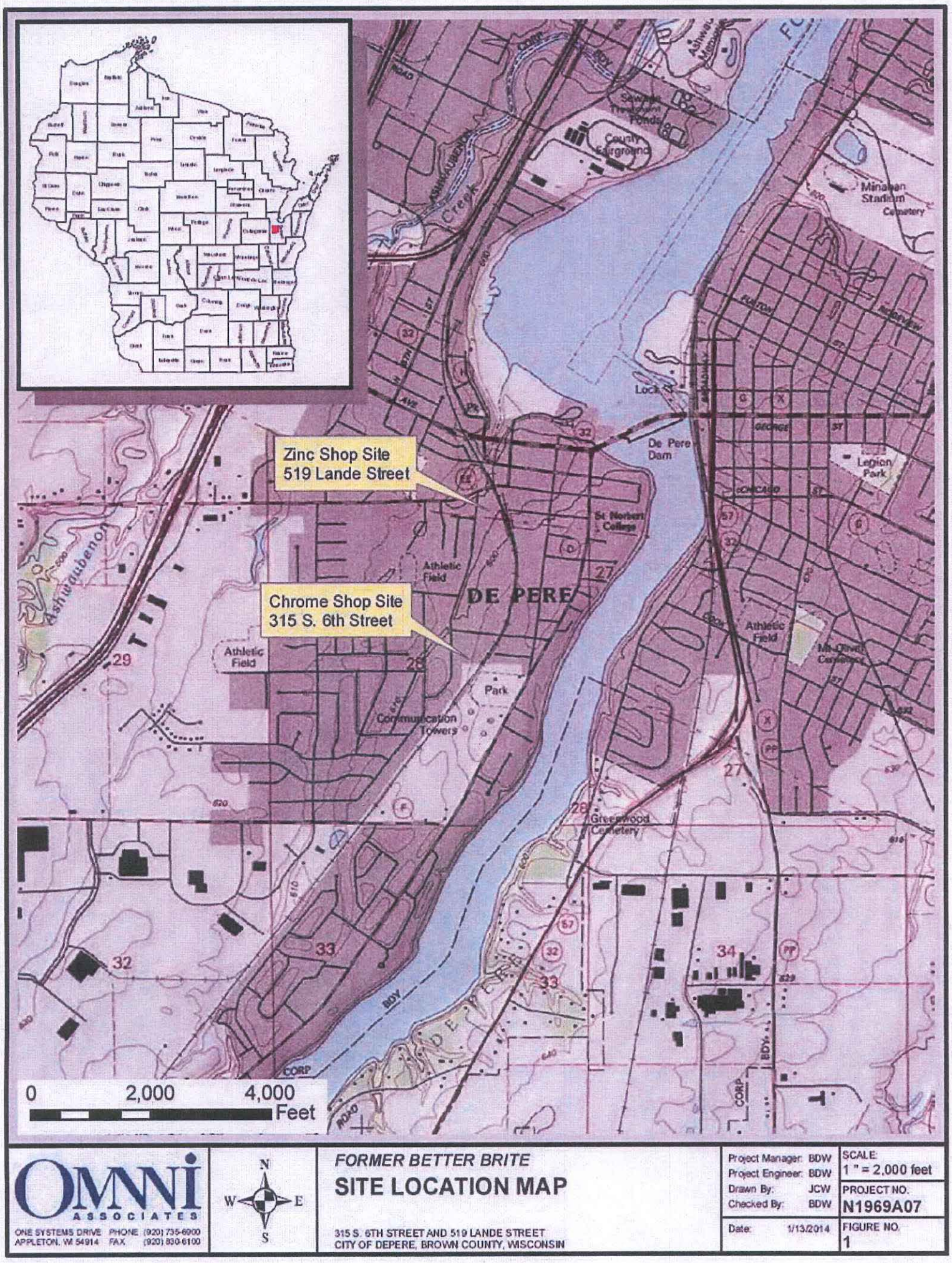


Figure 2: Groundwater Elevation Map—Zinc Shop

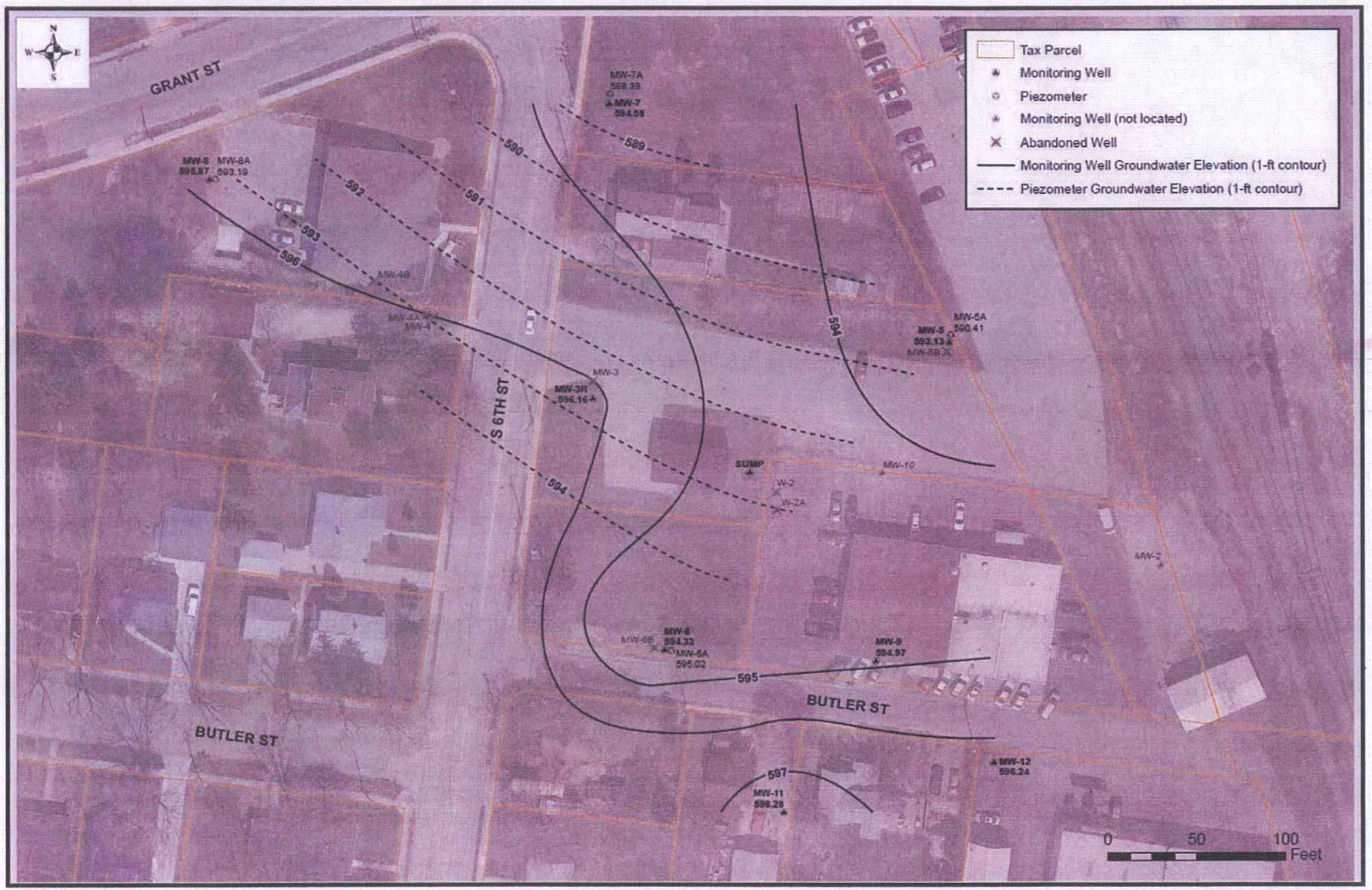
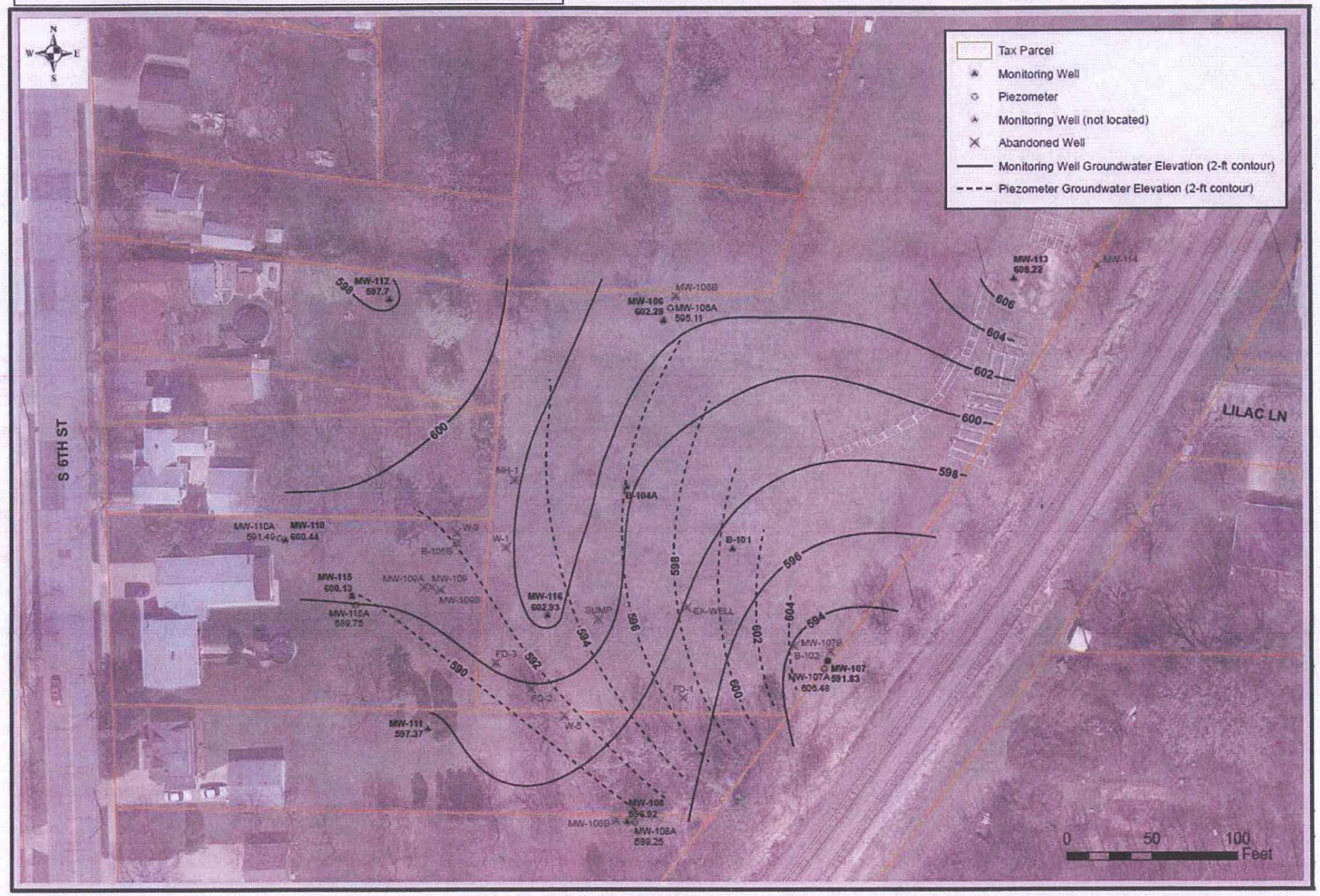


Figure 3: Groundwater Elevation Map—Chrome Shop



APPENDIX D

Restrictive covenants filed with Brown County

Ongoing Cleanups with Continuing Obligations
Cover Sheet

April, 2010
(RR 5391)

Purpose

This cover sheet summarizes continuing obligations regarding environmental conditions on this property. Continuing obligations are legal mechanisms that:

1) Require or restrict certain actions to protect human health or the environment.
2) Minimize human and natural resource exposure to contamination, and/or
3) Give notice of the **existence** of residual contamination

Learn more about continuing obligations at http://dnr.wi.gov/topic/brownfields/residual.html

DNR Property Information:

DNR Approval Date: Jun 28, 1991

BRRTS #: **02-05-000031** FID #: 405022420

ACTIVITY NAME: Better Brite - Zinc (SF)

PROPERTY ADDRESS: 315 South Sixth St

MUNICIPALITY: De Pere

PARCEL ID #: WD-103-1

***WTM COORDINATES:**

X: **673170** Y: **443082**

** Coordinates are in WTM83, NAD83 (1991)*

WTM COORDINATES REPRESENT:

○ Approximate Center Of Continuing Obligations

◉ Approximate Source Parcel Center

Please use the CLEAN system at http://dnr.wi.gov/topic/brownfields/clean.htm for additional DNR site information.

EPA Superfund Information (*if applicable*):

EPA ID: **WIT560010118** *To view more information click on the EPA ID.*

SITE NAME: BETTER BRITE PLATING CO. CHROME AND ZINC SHOPS

Requirements for *all* properties with Continuing Obligations

1. Properly manage contaminated soil if it is excavated. Sample and arrange appropriate treatment or disposal.
2. DNR approval is required if a water supply well will be constructed or reconstructed.

Site-Specific Requirement(s) - (BRRTS Action Code)

☒ A "cap" over the contaminated area must be: (222)
- ☐ Constructed & Maintained
- ☒ Maintained

☐ A vapor mitigation system must be: (226)
- ☐ Constructed & Maintained
- ☐ Maintained

☐ The need for vapor control technology must be evaluated if a building will be constructed. (228)

☐ The approved soil cleanup level is suitable for industrial use of the property. (220)

☐ DNR has approved construction on an abandoned landfill and certain maintenance requirements apply. (402) or (404)

☐ A structural impediment (e.g. building) is present which inhibited investigation/cleanup. Further environment work may be required if the impediment is removed. (224)

☐ DNR has directed a local government unit (LGU) to take an action and a LGU liability exemption applies. This exemption does not transfer to future private owners. (230)

☐ Another type of continuing obligation has been established in DNR's remedial action plan approval. (228)
Explain:

Environmental Protection Easement
and
Declaration of Restrictive Covenants

Document Number | Document Title

2466592

CATHY WILLIQUETTE
BROWN COUNTY RECORDER
GREEN BAY, WI

RECORDED ON
04/14/2010 11:38:29AM

REC FEE: 69.00
TRANS FEE:
EXEMPT #
PAGES: 30

Recording Area

Name and Return Address

City of De Pere
c/o Judith Schmidt-Lehman
335 S. Broadway Street
De Pere, WI 54115

WD-103-1 & WD-145

Parcel Identification Number (PIN)

"THIS PAGE IS PART OF THIS LEGAL DOCUMENT Do not Remove"

This information must be completed by submitter: document title, name & return address, and PIN (if required). Other information such as the granting clauses, legal description, etc. may be placed on this first page of the document or may be placed on additional pages of the document. Note: Use of this cover page adds one page to your document and $2.00 to the recording fee. Wisconsin Statutes, 59.517.

WRDA 2/96

ENVIRONMENTAL PROTECTION EASEMENT
AND
DECLARATION OF RESTRICTIVE COVENANTS

1. This Environmental Protection Easement and Declaration of Restrictive Covenants is made this 18 day of March, 2010, by and between the City of DePere, Wisconsin, ("Grantor"), having an address of 335 S. Broadway Street, DePere, WI, and Wisconsin Department of Natural Resources ("Grantee"), having an address of 101 South Webster Street, Madison, WI. Grantee, Wisconsin Department of Natural Resources, is acquiring this interest pursuant to §292.31 Wis. Stat. The Grantor and Grantee intend that the provisions of this Environmental Protection Easement and Declaration of Restrictive Covenants also be for the benefit of the United States, a third party beneficiary.

WITNESSETH:

2. WHEREAS, Grantor is the owner of two parcels of land located in the County of Brown, State of Wisconsin, more particularly described on **Exhibit A** attached hereto and made a part hereof (the "Property"); and

3. WHEREAS, the Property comprises the Better Brite Superfund Site ("Site"), which the U.S. Environmental Protection Agency ("EPA"), pursuant to Section 105 of the Comprehensive Environmental Response, Compensation and Liability Act ("CERCLA"), 42 U.S.C. § 9605, placed on the National Priorities List, set forth at 40 C.F.R. Part 300, Appendix B, by publication in the Federal Register on August 30, 1990; and

4. WHEREAS, in a Record of Decision dated September 24, 1996 (the "ROD"), the EPA Region 5 Regional Administrator selected a "remedial action" for the Site, which provides, in part, for the following actions: Extraction of groundwater at Zinc Shop; Relocation of treatment plant from Chrome Shop to Zinc Shop; Stabilization of hexavalent chromium in soil; Construction of new external foundation drains at two (2) properties near the Zinc Shop with collected water pumped to the pretreatment facility at the Zinc Shop; and, continued groundwater monitoring at the Chrome Shop and the Zinc Shop (**Exhibit C**). With the exception of post-remedial groundwater monitoring, the remedial action has been implemented at the Site; and

5. WHEREAS, the parties to this document, wishing to achieve necessary post-remedial environmental institutional controls, agree that this document will provide for: 1) a

grant of a right of access over the Property to the Grantee for purposes of implementing, facilitating and monitoring the remedial action until such time as EPA/WDNR determine that no monitoring of any media within the Site is required; and 2) to impose on the Property use restrictions as covenants that will run with the land for purpose of protecting human health and the environment until such time as EPA/WDNR determine that no monitoring of any media within the Site is required; and

6. WHEREAS, Grantor has cooperated fully with the Grantee in the implementation of all response actions at the Site and wishes to continue to do so.

NOW, THEREFORE:

7. Grant: Grantor, on behalf of itself, its successors and assigns, in consideration of the remedial action performed pursuant to the September 1996 ROD and 2004 CERCLA Five-year Review Report (a copy of which is available in the DePere Branch of the Brown County Public Library), does hereby covenant and declare that the Property shall be subject to the restrictions on use set forth below for so long as continued monitoring is required, and does give, grant and convey to the Grantee, and its assigns, with general warranties of title, 1) the right to enforce said use restrictions, and 2) an environmental protection easement of the nature and character, and for the purposes hereinafter set forth, with respect to the Property, that will run with the land for the purpose of protecting human health and the environment until such time as EPA/WDNR determine that no monitoring of any media within the Site is required.

8. Purpose: It is the purpose of this instrument to convey to the Grantee real property rights, which will run with the land, to facilitate the remediation of past environmental contamination and to protect human health and the environment by reducing the risk of exposure to contaminants. It is also the purpose of this instrument that the EPA as Third Party Beneficiary shall have the right to enforce the terms of this instrument.

9. Third Party Beneficiary: Grantor on behalf of itself and its successors, transferees and assigns and the Grantee on behalf of itself and its successors, transferees, and assigns hereby agree that the United States and its successors and assigns shall be the Third Party Beneficiary under this instrument.

10. Restrictions on use: The following covenants, conditions, and restrictions apply to the use of the Property, run with the land for the benefit of the Grantee and the EPA as Third Party Beneficiary and are binding upon the Grantor including its successors, transferees, assigns or other person acquiring an interest in the Property and their authorized agents, employees, or persons acting under their direction and control, for the purpose of protecting human health and the environment until such time as EPA/WDNR determine that no monitoring of any media within the Site is required: a) To prohibit use of groundwater for consumptive or other uses

without prior approval of WDNR and EPA on the Property; b) To prohibit excavation of soils or disturbance of the cap in the Chrome and Zinc shop areas of the Site (**Exhibit D**); and, c) to prohibit the following activities on the cap or cover in **Exhibit E** (unless prior written approval has been obtained from the WDNR or its successor or assign): (i) excavating or grading of the land surface; (ii) filling on the capped area; (iii) plowing for agricultural cultivation; and (iv) construction or installation of a building or other structure with a foundation that would sit on or be placed within the cap or cover in the Chrome and Zinc shop areas.

11. Modification of restrictions: Any request for modification or rescission of this instrument shall be made to the Grantee and the EPA at the addresses provided in Section 21 of this instrument. This instrument may be modified or rescinded only with the written approval of the EPA Superfund Division Director and the Director of the WDNR. Grantor on behalf of its successors, transferees, assigns or other person acquiring an interest in the Property agrees to record any EPA approved and WDNR approved modification to or rescission of this instrument with the Brown County Register of Deeds and a recorded copy shall be returned to the EPA and the WDNR at the addresses provided in Section 21 of this instrument.

12. Environmental Protection Easement: Grantor hereby grants to the Grantee for its use a right of access at all reasonable times to the Property for purposes of protecting human health and the environment until such time as EPA/WDNR determine that no monitoring of any media within the Site is required:

a) Implementing the response actions in the ROD;

b) Verifying any data or information submitted to EPA concerning the property or Site;

c) Verifying that no action is being taken on the Property in violation of the terms of this instrument or of any federal or state environmental laws or regulations;

d) Monitoring response actions on the Site and conducting investigations relating to contamination on or near the Site, including, without limitation, sampling of air, water, sediments, soils, and specifically, without limitation, obtaining split or duplicate samples;

e) Conducting periodic reviews of the remedial action, including but not limited to, reviews required by applicable statutes and/or regulations; and

f) Implementing additional or new response actions that either the Grantee or the U.S. EPA determine i) are necessary to protect the public health or the environment because either the original remedial action has proven to be ineffective or because new technology has been developed which will accomplish the purposes of the remedial action in a significantly more efficient or cost effective manner; and ii)

such additional or new response actions will not impose any significantly greater burden on the Property or unduly interfere with the then existing uses of the Property.

13. Reserved rights of Grantor: Grantor hereby reserves unto itself, its successors, and assigns, all rights and privileges in and to the use of the Property which are not incompatible with the restrictions, rights and easements granted herein.

14. EPA Entry, Access and Response Authority: The Grantor and Grantee consent to officers, employees, contractors, and authorized representatives of the EPA entering and having continued access to this property for the purposes described in paragraph 12. Nothing in this document shall limit or otherwise affect EPA's rights of entry and access pursuant to any and all powers conveyed by applicable federal or state environmental laws and regulations or EPA's authority to take response actions under CERCLA, the NCP, or other federal law.

15. No Public Access and Use: No right of access or use by the general public to any portion of the Property is conveyed by this instrument.

16. Notice requirement: Grantor agrees to include in any instrument conveying any interest in any portion of the Property, executed after the date of this instrument, including but not limited to deeds, leases and mortgages, a notice which is in substantially the following form:

NOTICE: THE INTEREST CONVEYED HEREBY IS SUBJECT TO AN ENVIRONMENTAL PROTECTION EASEMENT AND DECLARATION OF RESTRICTIVE COVENANTS, DATED , 20__, RECORDED IN THE PUBLIC LAND RECORDS OF THE BROWN COUNTY REGISTER OF DEEDS, ON _____, 20___, IN BOOK _____, PAGE _____, IN FAVOR OF, AND ENFORCEABLE BY THE WISCONSIN DEPARTMENT OF NATURAL RESOURCES AS GRANTEE AND THE UNITED STATES OF AMERICA AS THIRD PARTY BENEFICIARY.

Within thirty (30) days of the date any such instrument of conveyance is executed, Grantor must provide Grantee with a recorded copy of said instrument.

17. Administrative jurisdiction: The federal agency having administrative jurisdiction over the interests acquired by the United States by this instrument is the EPA. The WDNR has administrative jurisdiction over the interests acquired by this instrument.

18. Enforcement: The Grantee and the EPA, shall be entitled to enforce, individually or jointly, the terms of this instrument by all legal remedies available, including specific performance or other legal process. All remedies available hereunder shall be in addition to any and all other

remedies at law or in equity, including CERCLA. Enforcement of the terms of this instrument shall be at the discretion of the Grantee or the EPA, and any forbearance, delay or omission to exercise enforcement rights shall not be deemed to be a waiver by the Grantee or the EPA of the same or any other term, or of any other rights of the Grantee or the EPA, under this instrument.

19. Damages: Grantee and EPA shall be entitled to recover damages for violations of the terms of this instrument, or for any injury to the remedial action, to the public or to the environment protected by this instrument.

20. Covenants: Grantor hereby covenants to and with the Grantee and the United States and its assigns, that the Grantor is lawfully seized in fee simple of the Property, that the Grantor has a good and lawful right and power to sell and convey it or any interest therein, that the Property is free and clear of encumbrances, except those noted on **Exhibit B** attached hereto, and that the Grantor will warrant and defend the title thereto.

21. Notices: Any notice, demand, request, consent, approval, or communication that either party desires or is required to give to the other shall be in writing and shall either be served personally or sent by first class mail, postage prepaid, addressed as follows:

To Grantor:

City Clerk-Treasurer
335 S. Broadway Street
DePere, WI 54115

To Grantee:

Director, Bureau of Remediation and Redevelopment
Wisconsin Department of Natural Resources
101 South Webster Street
Madison, WI 53707-7921

To Third Party Beneficiary:

U.S. Environmental Protection Agency
Region 5 Administrator
77 West Jackson Boulevard
Chicago, IL 60604

22. General provisions:

a) Controlling law: The interpretation and performance of this instrument shall be governed by the laws of the United States or, if there are no applicable federal laws, by the law of the state of Wisconsin.

b) Liberal construction: If any provision of this instrument is found to be ambiguous, an interpretation consistent with the purpose of this instrument that would render the provision valid shall be favored over any interpretation that would render it invalid.

c) Severability: If any provision of this instrument is found to be invalid, the remainder of the provisions of this instrument shall not be affected thereby.

d) Entire Agreement: This instrument sets forth the entire agreement of the parties with respect to rights and restrictions created hereby, and supersedes all prior discussions, negotiations, understandings, or agreements relating thereto, all of which are merged herein.

e) No Forfeiture: Nothing contained herein will result in a forfeiture or reversion of Grantor's title in any respect.

f) Successors: The covenants, terms, conditions, and restrictions of this instrument shall be binding upon, and inure to the benefit of the parties hereto and their respective personal representatives, heirs, successors, and assigns and shall continue as a servitude running with the Property for purposes of protecting human health and the environment until such time as EPA/WDNR determine that no monitoring of any media within the Site is required. The term "Grantor", wherever used herein, and any pronouns used in place thereof, shall include the persons and/or entities named at the beginning of this document, identified as "Grantor" and their personal representatives, heirs, successors, and assigns. The term "Grantee", wherever used herein, and any pronouns used in place thereof, shall include the persons and/or entities named at the beginning of this document, identified as "Grantee" and their personal representatives, heirs, successors, and assigns. The rights of the Grantee and Grantor under this instrument are freely assignable, subject to the notice provisions hereof. However, the rights of the Grantee may be assigned only to a governmental entity with authority to assume the rights and obligations of that Grantee.

g) Termination of Rights and Obligations: A party's rights and obligations under this instrument terminate upon transfer of the party's interest in the Easement or Property, except that liability for acts or omissions occurring prior to transfer shall survive transfer.

h) Captions: The captions in this instrument have been inserted solely for convenience of reference and are not a part of this instrument and shall have no effect upon construction or interpretation.

i) Counterparts: The parties may execute this instrument in two or more counterparts, which shall, in the aggregate, be signed by both parties; each counterpart shall be deemed an original instrument as against any party who has signed it. In the event of any disparity between the counterparts produced, the recorded counterpart shall be controlling.

To Have And To Hold So Long As WDNR/EPA Determine That Monitoring Of Media Inside The Site Is Necessary For The Protection Of Human Health And The Environment.

IN WITNESS WHEREOF, Grantor has caused this Agreement to be signed in its name.

Executed this 25th day of January, 2016.

CITY OF DE PERE

Michael J. Walsh, Mayor

Charlene M. Peterson, Clerk- Treasurer

STATE OF WISCONSIN)
_____)SS.

BROWN COUNTY

personally came before me this 25th day of Jan., 2016 Michael J. & Charlene Peterson the abovenamed Michael J. known as the person(s) who executed the foregoing instrument and acknowledge the same.

Jennifer L Bishop
Notary Public, Jennifer L. Bishop
My Commission Expires: 9-26-16

JENNIFER L. BISHOP NOTARY PUBLIC STATE OF WISCONSIN

Drafted By: Judith Schmidt-Lehman

This Environmental Protection Easement and Declaration of Restrictive Covenants is accepted this 18th day of March, 2010.

STATE OF WISCONSIN
WISCONSIN DEPT. OF NATURAL RESOURCES

By: _____
Matthew J. Frank

_____
Secretary

STATE OF WISCONSIN)
)SS.
DANE COUNTY)

personally came before me this
19th day of MARCH, 2010,
the abovenamed PAT HENDERSON known
as the person(s) who executed the foregoing instrument
and acknowledge the same.

_____
Notary Public Eruina Kaberath
My Commission ~~Expires~~: is permanent

Attachments:	Exhibit A	-	legal description(s) of the Property
	Exhibit B	-	list of recorded title encumbrances (Title Search)
	Exhibit C	-	Groundwater monitoring wells and ground water pump and treat system
	Exhibit D	-	Zinc and Chrome Shop Areas - prohibit disturbance of Soils
	Exhibit E	-	Survey of Cap Area

EXHIBIT A TO

ENVIRONMENTAL PROTECTION EASEMENT AND DECLARATION OF RESTRICTIVE COVENANTS

Exhibit A

LEGAL DESCRIPTION:

A parcel of land being part of Lot One Hundred Sixty-seven (167), according to the recorded Assessor's Plat of West De Pere (f/k/a Assessor's Plat of Nicolet), in the City of De Pere, Brown County, Wisconsin, described as follows:

Beginning at the intersection of the West line of the right of way of the Wisconsin Central Limited Railroad Company and the South right of way line of Lande Street; thence along the arc of a 2775.99 foot radius curve to the West right of way line of the Wisconsin Central Limited Railroad Company on a chord which bears South 32 deg. 52 min. 30 sec. West and is 553.14 feet in length to the South line of Lot 167; thence North 87 deg. 25 min. 18 sec. West, 187.67 feet along said South line to the West line of said Lot 167; thence North 06 deg. 11 min. 23 sec. East, 250.51 feet along said West line; thence South 87 deg. 26 min. 46 sec. East, 155.90 feet; thence North 19 deg. 54 min. 46 sec. East (recorded as North 19 deg. 53 min. 30 sec. East), 262.95 feet to a point on the North line of Lot 167; thence South 81 deg. 14 min. 00 sec. East, 217.96 feet to the point of beginning.

(Better Brite - Chroma)
EXHIBIT A

Exhibit A

LEGAL DESCRIPTION:

The Northerly 42 feet of the Southerly 120 feet of the Westerly 131 feet of Lot One Hundred Twenty (120); and the Southerly 33 2/3 feet of Lot One Hundred Seventeen (117) and the Northerly 65 1/3 feet of Lot 120; all according to the recorded Plat of Assessor's Subdivision of Lands in Nicolet, in the City of De Pere, West side of Fox River, Brown County, Wisconsin.

(Better Brite - Zinc)
EXHIBIT A

EXHIBIT B TO

ENVIRONMENTAL PROTECTION EASEMENT AND DECLARATION OF RESTRICTIVE COVENANTS

Bay Title & Abstract, Inc.
345 S. Monroe Avenue
Green Bay, WI 54301
Phone: (920) 431-6100

LETTER REPORT

Attn: Penny Hubbard Greene

LR NO. 61926

A Search of the records in the office of the BROWN County Register of Deeds, BROWN County Clerk of Courts and BROWN County Treasurer was conducted on the following:

TRACT DATE: 11/2/2009 12:01:00AM

ADDRESS: 315 S. Sixth Street De Pere, WI 54115

TITLE VESTS:

City of De Pere by virtue of a Quit Claim Deed dated April 11, 2001 and recorded April 11, 2001 as Doc. No. 1805129.

MORTGAGES:

No open mortgages of record.

JUDGMENTS, TAX LIENS AND /OR CONSTRUCTION LIENS:

None of record.

TAX PARCEL NO. WD-103-1

PROPERTY TAXES:

NOTE: The 2008 Real Estate Taxes are EXEMPT.

The Undersigned hereby certifies that this report is compiled from the public records of the county in which the property described herein is located. Liability herein is expressly limited to the cost of this report. No liability is assumed for facts not shown in detail. This report is not to be used as evidence of title in lieu of a certified abstract or title insurance.

Certification is only made from the date present owners received title to the tract date stated herein.

No search has been made for special improvement bonds, special assessments, deferred charges for public works, easements or encroachments.

Thank you for the opportunity to serve your title needs.

Sincerely,

BAY TITLE & ABSTRACT, INC

Exhibit A

LEGAL DESCRIPTION:

The Northerly 42 feet of the Southerly 120 feet of the Westerly 131 feet of Lot One Hundred Twenty (120); and the Southerly 33 2/3 feet of Lot One Hundred Seventeen (117) and the Northerly 65 1/3 feet of Lot 120; all according to the recorded Plat of Assessor's Subdivision of Lands in Nicolet, in the City of De Pere, West side of Fox River, Brown County, Wisconsin.

COPY

Bay Title & Abstract, Inc.
345 S. Monroe Avenue
Green Bay, WI 54301
Phone: (920) 431-6100

LETTER REPORT

Attn: Keld Lauridsen
Wisconsin Dept. of Natural Resources

LR NO. 57230

A Search of the records in the office of the BROWN County Register of Deeds, BROWN County Clerk of Courts and BROWN County Treasurer was conducted on the following:

TRACT DATE: 5/22/2007 12:01:00AM

ADDRESS: 315 S. Sixth Street De Pere, WI 54115

TITLE VESTS:

City of De Pere by virtue of a Quit Claim Deed dated April 11, 2001 and recorded April 11, 2001 as Doc. No. 1805129.

MORTGAGES:

No open mortgages of record.

No Easements or Restrictions found.

JUDGMENTS, TAX LIENS AND /OR CONSTRUCTION LIENS:

None of record.

TAX PARCEL NO. WD-103-1

PROPERTY TAXES:

NOTE: The 2006 Real Estate Taxes are EXEMPT.

The Undersigned hereby certifies that this report is compiled from the public records of the county in which the property described herein is located. Liability herein is expressly limited to the cost of this report. No liability is assumed for facts not shown in detail. This report is not to be used as evidence of title in lieu of a certified abstract or title insurance.

Certification is only made from the date present owners received title to the tract date stated herein.

No search has been made for special improvement bonds, special assessments, deferred charges for public works, easements or encroachments.

Thank you for the opportunity to serve your title needs.

Sincerely,

BAY TITLE & ABSTRACT, INC

Exhibit A

LEGAL DESCRIPTION:

The Northerly 42 feet of the Southerly 120 feet of the Westerly 131 feet of Lot One Hundred Twenty (120); and the Southerly 33 2/3 feet of Lot One Hundred Seventeen (117) and the Northerly 65 1/3 feet of Lot 120; all according to the recorded Plat of Assessor's Subdivision of Lands in Nicolet, in the City of De Pere, West side of Fox River, Brown County, Wisconsin.

INVOICE

BAY TITLE & ABSTRACT, INC.

345 SOUTH MONROE AVENUE
GREEN BAY, WI 54301
(920) 431-6100

INVOICE NUMBER: B57230-IN
INVOICE DATE: 05/31/07
CUSTOMER NO.: WDNR

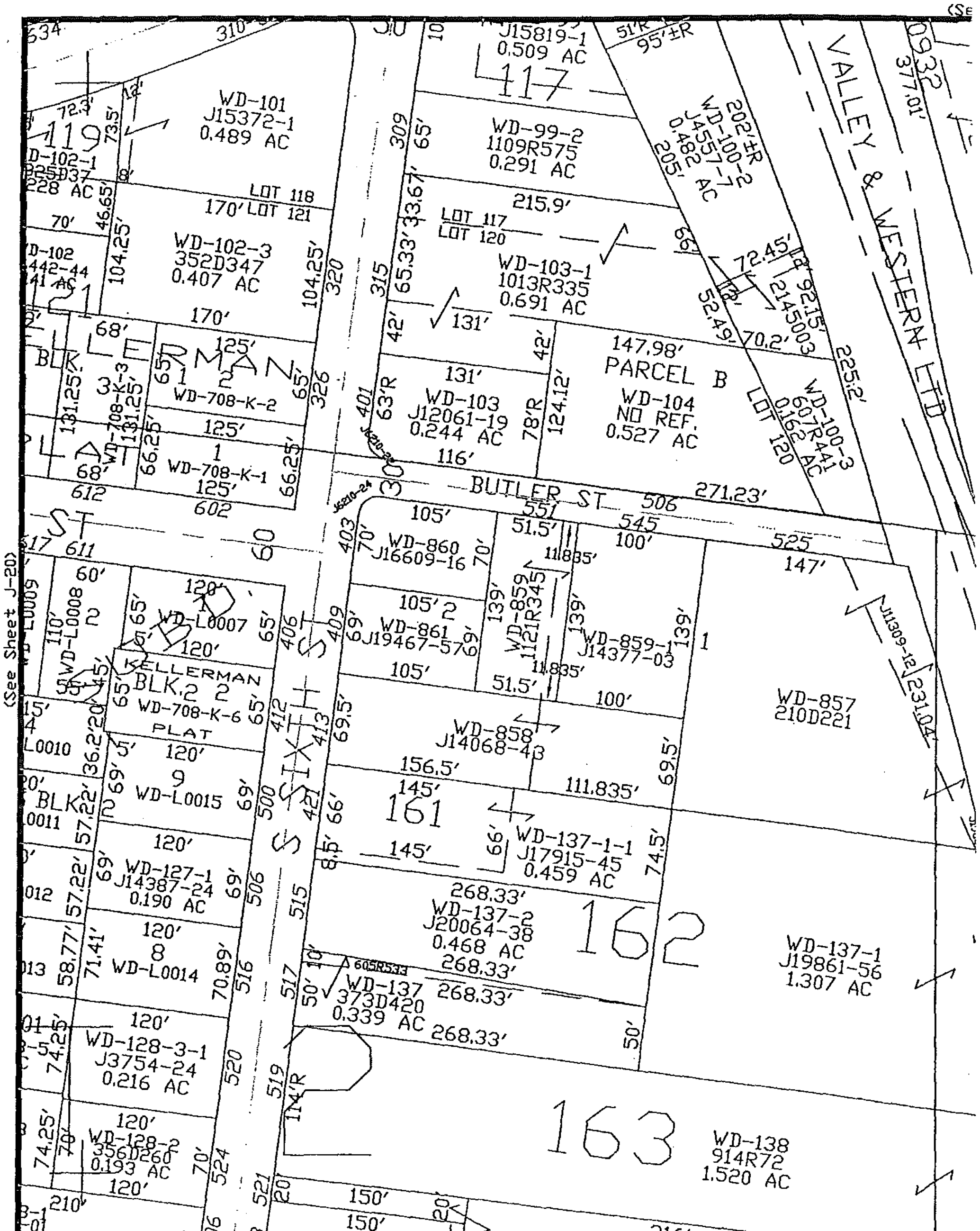
Wis. Dept. of Natural Resource
PO Box 10448
Green Bay, WI 54307

Attn: Keld Lauridsen

DESCRIPTION	AMOUNT
PROPERTY REPORT	150.00
City of De Pere 315 S. Sixth Street Tax Parcel #WD-103-1	

THANK YOU FOR YOUR ORDER
WE APPRECIATE YOUR BUSINESS

INVOICE TOTAL: 150.00



This is a compilation of records and data located in various county offices and is to be used for reference purposes only. The map is controlled by the field measurements between the corners of the Public Land Survey System and the parcels are mapped from available records which may not precisely fit field conditions. Brown County is not responsible for any inaccuracies.

Scale 1" = 100'

100 FT

(See

This map was c... provided by the

RECEIVED SEP 15 2000

602614

PLAT OF SURVEY

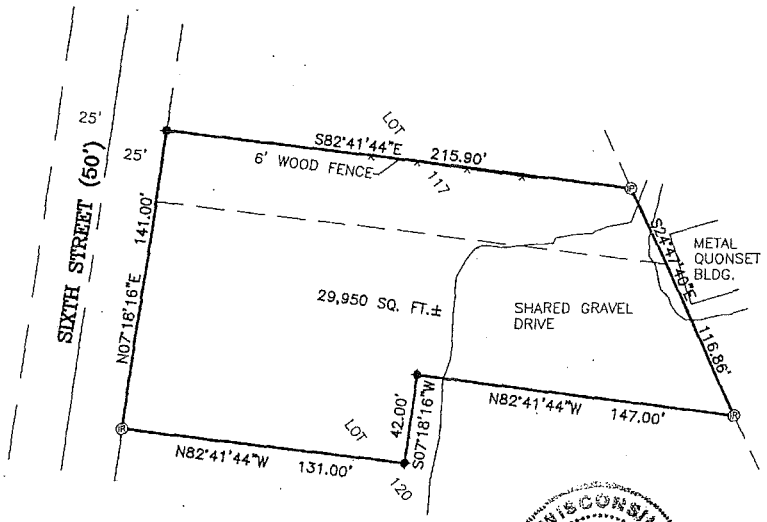
DESCRIPTION: BEING PART OF LOTS 117 AND 120, ACCORDING TO THE RECORDED PLAT OF A MAP OF ASSESSOR'S SUBDIVISION OF LANDS IN THE CITY OF NICOLET, NOW IN THE CITY OF DEPERE, WEST SIDE OF FOX RIVER, BROWN COUNTY, WISCONSIN. BEING LANDS DESCRIBED IN VOLUME 1013, PAGE 335.

LEGEND:
◆ = 1" X 24" IRON PIPE SET, WEIGHING 1.13 LBS. PER LIN. FT.
Ⓟ = 1" IRON PIPE FOUND
Ⓡ = 3/4" SOLID ROUND CAPPED IRON REBAR FOUND

CLIENT:
HSI GEOTRANS, INC.
175 N. CORPORATE DRIVE
SUITE 100
BROOKFIELD, WISCONSIN 53045

NORTH IS REFERENCED TO THE WEST LINE OF LOT 120, ACCORDING TO THE RECORDED PLAT OF A MAP OF ASSESSOR'S SUBDIVISION OF LANDS IN THE CITY OF DEPERE, BROWN COUNTY, WISCONSIN, WHICH IS ASSUMED TO BEAR N07°18'16"E.

N



WISCONSIN
KEITH J. VALENTYNE
S-2198
APPLETON
WI
REGISTERED LAND SURVEYOR

I HEREBY CERTIFY THAT I HAVE SURVEYED THE ABOVE DESCRIBED PROPERTY AS SHOWN ACCORDING TO THE OFFICIAL RECORDS AND THAT THIS PLAT OF SURVEY IS A CORRECT REPRESENTATION OF SAID SURVEY

Keith J. Valentyne 9-20-99

KEITH J. VALENTYNE, RLS-2198 DATED

CAROW LAND SURVEYING CO., INC.
1837 W. WISCONSIN AVE., P.O. BOX 1297
APPLETON, WISCONSIN 54912-1297
PHONE 920-731-4168 FAX 731-5673

SCALE	1"=50'
DRAWN BY	kv-tm DGV
PROJECT NO.	A949.13-1-99

VOL DPW SECTOR 3 PAGE 121

Bay Title & Abstract, Inc.
345 S. Monroe Avenue
Green Bay, WI 54301
Phone: (920) 431-6100

LETTER REPORT

Attn: Penny Hubbard Greene

LR NO. 61927

A Search of the records in the office of the BROWN County Register of Deeds, BROWN County Clerk of Courts and BROWN County Treasurer was conducted on the following:

TRACT DATE: 11/2/2009 12:01:00AM

ADDRESS: 500 Block Lande Street De Pere, WI 54115

TITLE VESTS:

City of De Pere by virtue of a Quit Claim Deed dated July 17, 2001 and recorded July 17, 2001 as Doc. No. 1827756.

MORTGAGES:

No open mortgages of record.

JUDGMENTS, TAX LIENS AND /OR CONSTRUCTION LIENS:

None of record.

TAX PARCEL NO. WD-145

PROPERTY TAXES:

NOTE: The 2008 Real Estate Taxes are EXEMPT.

The Undersigned hereby certifies that this report is compiled from the public records of the county in which the property described herein is located. Liability herein is expressly limited to the cost of this report. No liability is assumed for facts not shown in detail. This report is not to be used as evidence of title in lieu of a certified abstract or title insurance.

Certification is only made from the date present owners received title to the tract date stated herein.

No search has been made for special improvement bonds, special assessments, deferred charges for public works, easements or encroachments.

Thank you for the opportunity to serve your title needs.

Sincerely,

BAY TITLE & ABSTRACT, INC

Exhibit A

LEGAL DESCRIPTION:

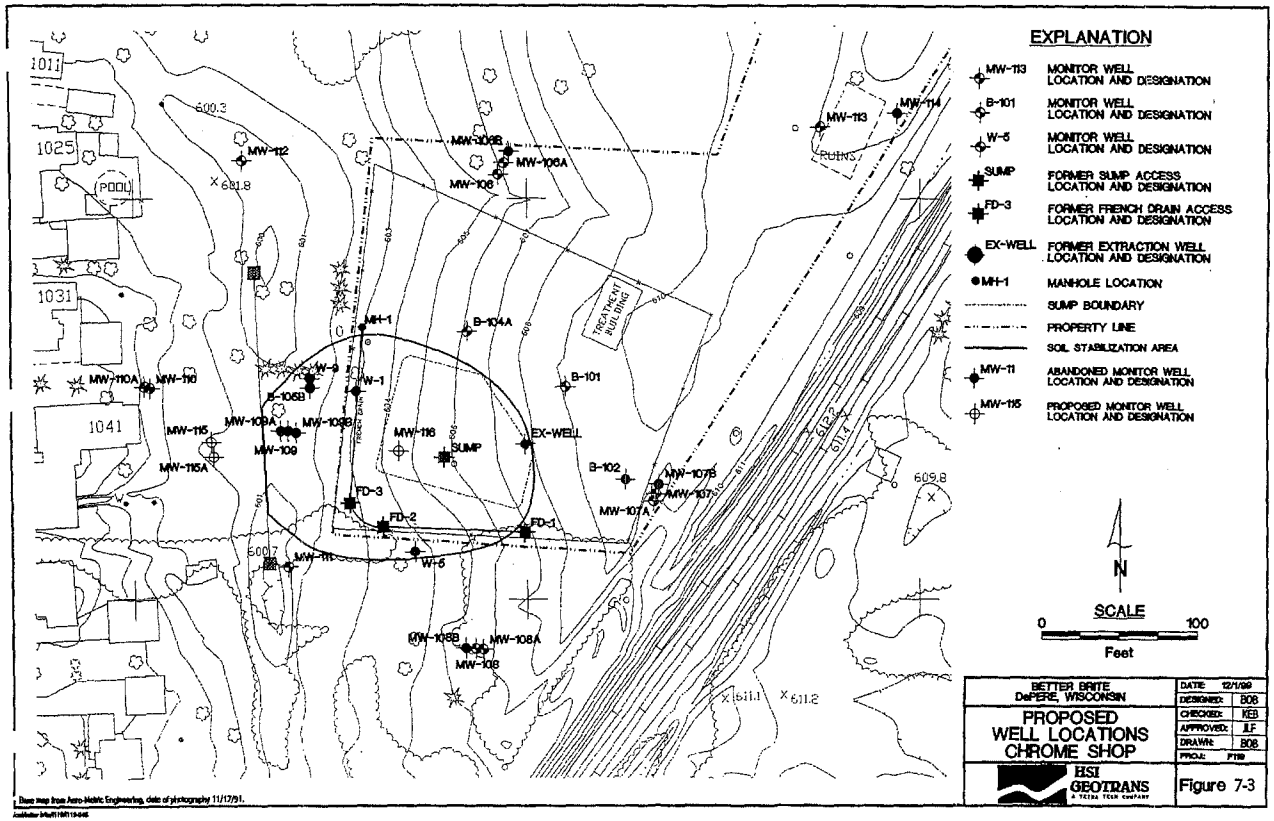
A parcel of land being part of Lot One Hundred Sixty-seven (167), according to the recorded Assessor's Plat of West De Pere (f/k/a Assessor's Plat of Nicolet), in the City of De Pere, Brown County, Wisconsin, described as follows:

Beginning at the intersection of the West line of the right of way of the Wisconsin Central Limited Railroad Company and the South right of way line of Lande Street; thence along the arc of a 2775.99 foot radius curve to the West right of way line of the Wisconsin Central Limited Railroad Company on a chord which bears South 32 deg. 52 min. 30 sec. West and is 553.14 feet in length to the South line of Lot 167; thence North 87 deg. 25 min. 18 sec. West, 187.67 feet along said South line to the West line of said Lot 167; thence North 06 deg. 11 min. 23 sec. East, 250.51 feet along said West line; thence South 87 deg. 26 min. 46 sec. East, 155.90 feet; thence North 19 deg. 54 min. 46 sec. East (recorded as North 19 deg. 53 min. 30 sec. East), 262.95 feet to a point on the North line of Lot 167; thence South 81 deg. 14 min. 00 sec. East, 217.96 feet to the point of beginning.

EXHIBITS C, D AND E TO

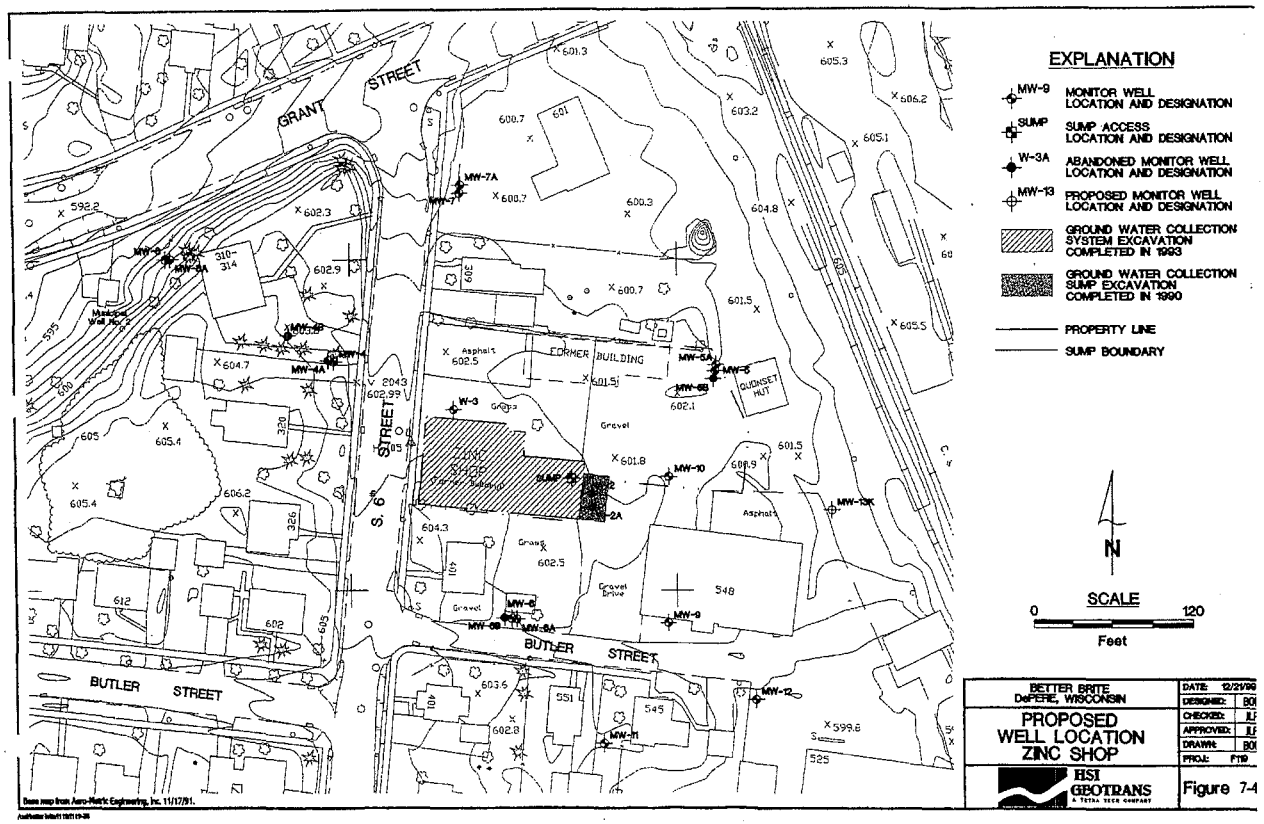
ENVIRONMENTAL PROTECTION EASEMENT AND DECLARATION OF RESTRICTIVE COVENANTS

[Note that the area where disturbance of soils is prohibited and the cap location is approximately the area formerly enclosed by the fence shown the figure labeled 7-3.]



Base map from Aero-Metric Engineering, date of photography 11/17/91.

BETTER BRITE DePERE, WISCONSIN	DATE: 12/1/99
	DESIGNED: BDB
	CHECKED: KEB
PROPOSED WELL LOCATIONS CHROME SHOP	APPROVED: JLF
	DRAWN: BDB
	PROJ.: FTW
HSI GEOTRANS A TETRA TECH COMPANY	Figure 7-3



Base map from Aero-Metric Engineering, Inc. 11/17/91.

BETTER BRITE DePERE, WISCONSIN	DATE: 12/21/93
PROPOSED WELL LOCATION ZINC SHOP	DESIGNED: BO CHECKED: JLF APPROVED: JLF DRAWN: BO PROJ: FT19
HSI GEOTRANS A TETRA TECH COMPANY	Figure 7-4

APPENDIX E

FYR Inspection Checklist

Site Inspection Checklist

I. SITE INFORMATION	
Site name: **Better Brite Plating Co. Chrome and Zinc Shops**	**Date of inspection:** **5/14/2019**
Location and Region: **De Pere, Wisconsin, Region 5**	**EPA ID:** **WIT560010118**
Agency, office, or company leading the FYR: USEPA	**Weather/temperature:** Sunny, 70 degrees F

Remedy Includes: (Check all that apply)

☐ Landfill cover/containment	☐ Monitored natural attenuation
☒ Access controls	☐ Groundwater containment
☒ Institutional controls	☐ Vertical barrier walls
☒ Groundwater pump and treatment	☐ Other: in-situ stablilization and solidification treatment of chromium contaminated soils and groundwater
☐ Surface water collection and treatment	

Attachments:

☒ Inspection team roster attached	☒ Site map attached

Site Inspection Checklist

II. INTERVIEWS (Check all that apply)
1. **O&M Site Manager** **Nick Glander,** Title , Click or tap to enter a date. Interviewed: ☒ at site ☐ at office ☐ by phone Phone Number: Click here to enter text. Problems, suggestions: ☐ Report attached Click or tap here to enter text.
2. **O&M Staff** Name , Title , Click or tap to enter a date. Interviewed: ☐ at site ☐ at office ☐ by phone Phone Number: Click here to enter text. Problems, suggestions: ☐ Report attached Click or tap here to enter text.
3. **Local regulatory authorities and response agencies** (i.e., State and Tribal offices, emergency response office, police department, office of public health or environmental health, zoning office, recorder of deeds, or other city and county offices, etc.) Fill in all that apply. Agency: WDNR Contact: Keld Lauridsen, Project Manager, 5/14/2019, P: (920) 662-5420 Problems, suggestions: ☐ Report attached No Problems Agency: Click or tap here to enter text. Contact: Name , Title , Click or tap to enter a date., P: Phone Number Problems, suggestions: ☐ Report attached Click or tap here to enter text. Agency: Click or tap here to enter text. Contact: Name , Title , Click or tap to enter a date., P: Phone Number Problems, suggestions: ☐ Report attached Click or tap here to enter text. Agency: Click or tap here to enter text. Contact: Name , Title , Click or tap to enter a date., P: Phone Number Problems, suggestions: Click or tap here to enter text.
4. **Other Interviews (optional):** ☐ Report attached Click or tap here to enter text.

III. ON-SITE DOCUMENTS & RECORDS VERIFIED (Check all that apply)			
1. O&M Documents			
☒ O&M manual	☒ Readily available	☒ Up to date	☐ N/A
☐ As-built drawings	☐ Readily available	☐ Up to date	☐ N/A
☒ Maintenance logs	☒ Readily available	☒ Up to date	☐ N/A
Remarks: Click or tap here to enter text.			
2. Site-Specific Health and Safety Plan		☐ Readily available	
☐ Contingency Plan/Emergency Response Plan		☐ Readily available	
Remarks: Click or tap here to enter text.			
3. O&M and OSHA Training Records			
	☐ Readily available	☒ Up to date	☐ N/A
Remarks: Click or tap here to enter text.			
4. Permits and Service Agreements			
☐ Air discharge permit	☐ Readily available	☐ Up to date	☒ N/A
☐ Effluent discharge	☐ Readily available	☐ Up to date	☐ N/A
☐ Waste disposal, POTW	☐ Readily available	☐ Up to date	☐ N/A
☐ Other permits: Click or tap here to enter text.			
Remarks: Click or tap here to enter text.			
5. Gas Generation Records			
	☐ Readily available	☐ Up to date	☒ N/A
Remarks: Click or tap here to enter text.			
6. Settlement Monument Records			
	☐ Readily available	☐ Up to date	☒ N/A
Remarks: Click or tap here to enter text.			
7. Groundwater Monitoring Records			
	☒ Readily available	☐ Up to date	☐ N/A
Remarks: Click or tap here to enter text.			
8. Leachate Extraction Records			
	☐ Readily available	☐ Up to date	☒ N/A
Remarks: Click or tap here to enter text.			

9. Discharge Compliance Records

☐ Air	☐ Readily available	☐ Up to date	☐ N/A
☒Water (effluent)	☒ Readily available	☒ Up to date	☐ N/A

Remarks: Click or tap here to enter text.

10. Daily Access/Security Logs

☐ Readily available ☐ Up to date ☒ N/A

Remarks: Click or tap here to enter text.

IV. O&M COSTS

1. O&M Organization

☐ State in-house ☒ Contractor for State

☐ PRP in-house ☐ Contractor for PRP

☐ Federal Facility in-house ☐ Contractor for Federal Facility

Remarks: Click or tap here to enter text.

2. O&M Cost Records

☒Readily available ☐ Up to date ☒ Funding mechanism/agreement in place

Original O&M cost estimate $103,400 ☐ Breakdown attached

Total annual cost by year for review period if available

From	To	Total cost	
Click or tap to enter a date.	Click or tap to enter a date.	Click or tap here to enter text.	☐ Breakdown attached
From	To	Total cost	
Click or tap to enter a date.	Click or tap to enter a date.	Click or tap here to enter text.	☐ Breakdown attached
From	To	Total cost	
Click or tap to enter a date.	Click or tap to enter a date.	Click or tap here to enter text.	☐ Breakdown attached
From	To	Total cost	
Click or tap to enter a date.	Click or tap to enter a date.	Click or tap here to enter text.	☐ Breakdown attached
From	To	Total cost	
Click or tap to enter a date.	Click or tap to enter a date.	Click or tap here to enter text.	☐ Breakdown attached

3. Unanticipated or Unusually High O&M Costs During Review Period

Describe costs and reasons:

Click or tap here to enter text.

V. ACCESS AND INSTITUTIONAL CONTROLS

☒ Applicable ☐ N/A

1. Fencing Damaged ☐ Location shown on site map ☐ Gates secured ☐ N/A

Remarks: Click or tap here to enter text.

2. Other Access Restrictions ☐ Location shown on site map ☐ Gates secured

Remarks: Click or tap here to enter text.

3. Institutional Controls (ICs)

A. Implementation and Enforcement

Site conditions imply ICs not properly implemented	☐ Yes	☒ No	☐ N/A
Site conditions imply ICs not being fully enforced	☐ Yes	☒ No	☐ N/A
Type of monitoring (*e.g.*, self-reporting, drive by)	Click or tap here to enter text.		
Frequency	Click or tap here to enter text.		
Responsible party/agency	City of De Pere		
Contact: Name , Title , Click or tap to enter a date., P: Phone Number			
Reporting is up-to-date	☐ Yes	☐ No	☐ N/A
Reports are verified by the lead agency	☐ Yes	☐ No	☐ N/A
Specific requirements in deed or decision documents have been met	☐ Yes	☐ No	☐ N/A
Violations have been reported	☐ Yes	☐ No	☐ N/A

Other problems or suggestions:

Report attached

B. Adequacy ☒ ICs are adequate ☐ ICs are inadequate ☐ N/A

Remarks: Click or tap here to enter text.

4. General

A. Vandalism/Trespassing ☐ Location shown on site map ☒ No vandalism evident

Remarks: Click or tap here to enter text.

B. Land use changes on site ☐ N/A

Remarks: Building addition to the Thirft Shop and additional parking area paved with asphalt south of pump house at the Zinc Shop

C. Land use changes off site ☐ N/A

Remarks: Click or tap here to enter text.

VI. GENERAL SITE CONDITIONS

1. Roads ☒ Applicable ☐ N/A

A. Roads damaged ☒ Location shown on site map ☒ Roads adequate ☐ N/A

Remarks: Click or tap here to enter text.

B. Other Site Conditions

Remarks: Click or tap here to enter text.

VII. LANDFILL COVERS

1. Landfill Surface ☐ Applicable ☒ N/A

A. Settlement (Low Spots) ☐ Location Shown on Site Map ☐ Settlement Not Evident

Areal Extent: Click or tap here to enter text. Depth: Click or tap here to enter text.

Remarks: Click or tap here to enter text.

B. Cracks ☐ Location Shown on Site Map ☐ Cracking Not Evident

Lengths: Click or tap here to enter text. Widths: Click or tap here to enter text. Depths: Click or tap here to enter text.

Remarks: Click or tap here to enter text.

C. Erosion ☐ Location Shown on Site Map ☐ Erosion Not Evident

Areal Extent: Click or tap here to enter text. Depth: Click or tap here to enter text.

Remarks: Click or tap here to enter text.

D. Holes ☐ Location Shown on Site Map ☐ Holes Not Evident

Areal Extent: Click or tap here to enter text. Depth: Click or tap here to enter text.

Remarks: Click or tap here to enter text.

E. Vegetative Cover ☐ Grass ☐ Cover Properly Established

☐ Tress/Shrubs (indicate size and locations on a diagram ☐ No Signs of Stress

Remarks: Click or tap here to enter text.

F. Alternative Cover (armored rock, concrete, etc.) ☐ N/A

Remarks: Click or tap here to enter text.

G. Bulges ☐ Location Shown on Site Map ☐ Bulges Not Evident

Areal Extent: Click or tap here to enter text. Height: Click or tap here to enter text.

Remarks: Click or tap here to enter text.

H. Wet Areas/Water Damage ☐ Wet Areas/Water Damage Not Evident

☐ Wet Areas ☐ Location Shown on Site Map Areal Extent: Click or tap here to enter text.

☐ Ponding ☐ Location Shown on Site Map Areal Extent: Click or tap here to enter text.

☐ Seeps ☐ Location Shown on Site Map Areal Extent: Click or tap here to enter text.

☐ Soft Subgrade ☐ Location Shown on Site Map Areal Extent: Click or tap here to enter text.

Remarks: Click or tap here to enter text.

I. Slope Instability ☐ Location Shown on Site Map ☐ Slope Instability Not Evident

☐ Slides Areal Extent: Click or tap here to enter text.

Remarks: Click or tap here to enter text.

2. Benches ☐ Applicable ☐ N/A

(Horizontally constructed mounds of earth placed across a steep landfill side slope to interrupt the slope in order to slow down the velocity of surface runoff and intercept and convey the runoff to a lined channel.)

A. Flows Bypass Bench ☐ Location Shown on Site Map ☒ N/A or Okay

Remarks: Click or tap here to enter text.

B. Bench Breached ☐ Location Shown on Site Map ☒ N/A or Okay

Remarks: Click or tap here to enter text.

C. Bench Overtopped ☐ Location Shown on Site Map ☒ N/A or Okay

Remarks: Click or tap here to enter text.

3. Letdown Channels ☐ Applicable ☒ N/A

(Channel lined with erosion control mats, riprap, grout bags, or gabions that descend down the steep side slope of the cover and will allow the runoff water collected by the benches to move off of the landfill cover without creating erosion gullies.)

A. Settlement ☐ Location Shown on Site Map ☐ Settlement Not Evident

Areal Extent: Click or tap here to enter text. Depth: Click or tap here to enter text.

Remarks: Click or tap here to enter text.

B. Material Degradation ☐ Location Shown on Site Map ☐ Degradation Not Evident

Material Type: Click or tap here to enter text. Areal Extent: Click or tap here to enter text.

Remarks: Click or tap here to enter text.

C. Erosion ☐ Location Shown on Site Map ☐ Erosion Not Evident

Areal Extent: Click or tap here to enter text. Depth: Click or tap here to enter text.

Remarks: Click or tap here to enter text.

D. Undercutting ☐ Location Shown on Site Map ☐ Undercutting Not Evident

Areal Extent: Click or tap here to enter text. Depth: Click or tap here to enter text.

Remarks: Click or tap here to enter text.

E. Obstructions ☐ Location Shown on Site Map ☐ Undercutting Not Evident

Type: Click or tap here to enter text.

Areal Extent: Click or tap here to enter text. Size: Click or tap here to enter text.

Remarks: Click or tap here to enter text.

F. Excessive Vegetative Growth ☐ Location Shown on Site Map ☐ Excessive Growth Not Evident

Areal Extent: Click or tap here to enter text. ☐ Vegetation in channels does not obstruct flow

Remarks: Click or tap here to enter text.

4. Cover Penetrations ☐ Applicable ☐ N/A

A. Gas Vents ☐ Active ☐ Passive

☐ Properly secured/locked ☐ Functioning ☐ Routinely sampled

☐ Good condition ☐ Evidence of leakage at penetration

☐ Needs Maintenance ☐ N/A

Remarks: Click or tap here to enter text.

B. Gas Monitoring Probes

☐ Properly secured/locked ☐ Functioning ☐ Routinely sampled

☐ Good condition ☐ Evidence of leakage at penetration

☐ Needs Maintenance ☐ N/A

Remarks: Click or tap here to enter text.

C. Monitoring Wells

☐ Properly secured/locked ☐ Functioning ☐ Routinely sampled

☐ Good condition ☐ Evidence of leakage at penetration

☐ Needs Maintenance ☐ N/A

Remarks: Click or tap here to enter text.

D. Leachate Extraction Wells

☐ Properly secured/locked ☐ Functioning ☐ Routinely sampled

☐ Good condition ☐ Evidence of leakage at penetration

☐ Needs Maintenance ☒ N/A

Remarks: Click or tap here to enter text.

E. Settlement Monuments ☐ Located ☐ Routinely Surveyed ☐ N/A

Remarks: Click or tap here to enter text.

5. Gas Collection and Treatment ☐ Applicable ☐ N/A

A. Gas Treatment Facilities

☐ Flaring ☐ Thermal Destruction ☐ Collection for Reuse

☐ Good condition ☐ Needs Maintenance

Remarks: Click or tap here to enter text.

B. Gas Collection Wells, Manifolds, and Piping

☐ Good condition ☐ Needs Maintenance ☐ N/A

Remarks: Click or tap here to enter text.

C. Gas Monitoring Facilities (e.g. gas monitoring of adjacent homes or buildings)

☐ Good condition ☐ Needs Maintenance ☒ N/A

Remarks: Click or tap here to enter text.

6. Cover Drainage Layer ☐ Applicable ☐ N/A

A. Outlet Pipes Inspected ☐ Functioning ☒ N/A

Remarks: Click or tap here to enter text.

B. Outlet Rock Inspected ☐ Functioning ☒ N/A

Remarks: Click or tap here to enter text.

7. Detention/Sediment Ponds ☐ Applicable ☒ N/A

A. Siltation ☐ Siltation Not Evident ☒ N/A

Areal Extent: Click or tap here to enter text. Depth: Click or tap here to enter text.

Remarks: Click or tap here to enter text.

B. Erosion ☒ Erosion Not Evident

Areal Extent: Click or tap here to enter text. Depth: Click or tap here to enter text.

Remarks: Click or tap here to enter text.

C. Outlet Works ☐ Functioning ☒ N/A

Remarks: Click or tap here to enter text.

D. Dam ☐ Functioning ☒ N/A

Remarks: Click or tap here to enter text.

8. Retaining Walls ☐ Applicable ☒ N/A

A. Deformations ☐ Location Shown on Site Map ☐ Deformation Not Evident

Horizontal Displacement: Click or tap here to enter text.

Vertical Displacement: Click or tap here to enter text.

Rotational Displacement: Click or tap here to enter text.

Remarks: Click or tap here to enter text.

B. Degradation ☐ Location Shown on Site Map ☐ Deformation Not Evident

Remarks: Click or tap here to enter text.

9. Perimeter Ditches/Off-Site Discharge ☒ Applicable ☒ N/A

A. Siltation ☐ Location Shown on Site Map ☐ Siltation Not Evident

Areal Extent: Click or tap here to enter text. Depth: Click or tap here to enter text.

Remarks: Click or tap here to enter text.

B. Vegetative Growth ☐ Location Shown on Site Map ☐ N/A

☐ Vegetation Does Not Impede Flow

Areal Extent: Click or tap here to enter text. Type: Click or tap here to enter text.

Remarks: Click or tap here to enter text.

C. Erosion ☐ Location Shown on Site Map ☐ Erosion Not Evident

Areal Extent: Click or tap here to enter text. Depth: Click or tap here to enter text.

Remarks: Click or tap here to enter text.

D. Discharge Structure ☐ Functioning ☐ N/A

Remarks: Click or tap here to enter text.

VIII. VERTICAL BARRIER WALLS

☐ Applicable ☒ N/A

1. Settlement ☐ Location Shown on Site Map ☐ Settlement Not Evident

Areal Extent: Click or tap here to enter text. Depth: Click or tap here to enter text.

Remarks: Click or tap here to enter text.

2. Performance Monitoring Type of Monitoring: Click or tap here to enter text.

☐ Performance Not Monitored ☐ Evidence of Breaching

Frequency: Click or tap here to enter text. Head Differential: Click or tap here to enter text.

Remarks: Click or tap here to enter text.

IX. GROUNDWATER/SURFACE WATER REMEDIES

☒ Applicable ☐ N/A

1. Groundwater Extraction Wells, Pumps, and Pipelines ☒ Applicable ☐ N/A

A. Pumps, Wellhead Plumbing, and Electrical ☐ N/A

☒ Good Condition ☒ All Required Wells Properly Operating ☐ Needs Maintenance

Remarks: Click or tap here to enter text.

B. Extraction System Pipelines, Valves, Valve Boxes, and Other Appurtenances

☒ Good Condition ☐ Needs Maintenance

Remarks: Click or tap here to enter text.

C. Spare Parts and Equipment ☐ Needs to be Provided

☒ Readily Available ☒ Good Condition ☐ Requires Upgrade

Remarks: Click or tap here to enter text.

2. Surface Water Collection Structures, Pumps, and Pipelines ☒ Applicable ☐ N/A

A. Collection Structures, Pumps, and Electrical

☒ Good Condition ☐ Needs Maintenance

Remarks: Click or tap here to enter text.

B. Surface Water Collection System Pipelines, Valves, Valve Boxes, and Other Appurtenances

☒ Good Condition ☐ Needs Maintenance

Remarks: Click or tap here to enter text.

C. Spare Parts and Equipment ☐ Needs to be Provided

☐ Readily Available ☒ Good Condition ☐ Requires Upgrade

Remarks: Click or tap here to enter text.

3. Treatment System ☒ Applicable ☐ N/A

A. Treatment Train (Check components that apply)

☒ Metals removal ☐ Oil/Water Separation ☐ Bioremediation

☐ Air Stripping ☐ Carbon Absorbers

☐ Filters Click or tap here to enter text.

☒ Additive (e.g. chelation agent, flocculent) Sulfuric acit, sodium bisulfite, magnesium hydroxide, sodium hydroxide, polymer and flocculation

☐ Others Click or tap here to enter text.

☒ Good Condition ☐ Needs Maintenance

☒ Sampling ports properly marked and functional

☒ Sampling/maintenance log displayed and up to date

☒ Equipment properly identified

☒ Quantity of groundwater treated annually Click or tap here to enter text.

☐ Quantity of surface water treated annually Click or tap here to enter text.

Remarks: Click or tap here to enter text.

B. Electrical Enclosures and Panels (properly rated and functional)

☒ N/A ☐ Good Condition ☐ Needs Maintenance

Remarks: Click or tap here to enter text.

C. Tanks, Vaults, Storage Vessels ☐ N/A

☒ Proper Secondary Containment ☒ Good Condition ☐ Needs Maintenance

Remarks: Click or tap here to enter text.

D. Discharge Structure and Appurtenances

☐ N/A ☒ Good Condition ☐ Needs Maintenance

Remarks: Click or tap here to enter text.

E. Treatment Building(s)

☐ N/A ☒ Good condition (esp. roof and doorways)

☐ Needs repair ☒ Chemicals and equipment properly stored

Remarks Click or tap here to enter text.

F. Monitoring Wells (Pump and Treatment Remedy) ☐ N/A

☒ Properly secured/locked ☒ Functioning

☒ Routinely sampled ☒ All required wells located

☒ Good condition ☐ Needs Maintenance

Remarks Click or tap here to enter text.

4. Monitoring Data

A. Monitoring Data:

☒ Is Routinely Submitted on Time ☐ Is of Acceptable Quality

B. Monitoring Data Suggests:

☒ Groundwater plume is effectively contained ☒ Contaminant concentrations are declining

5. Monitored Natural Attenuation

A. Monitoring Wells (natural attenuation remedy) ☒ N/A

☐ Properly secured/locked ☐ Functioning ☐ Routinely sampled

☐ All required wells located ☐ Needs Maintenance ☐ Good condition

Remarks: Click or tap here to enter text.

X. OTHER REMEDIES

If there are remedies applied at the site which are not covered above, attach an inspection sheet describing the physical nature and condition of any facility associated with the remedy. An example would be soil vapor extraction.

XI. OVERALL OBSERVATIONS

1. Implementation of the Remedy

Describe issues and observations relating to whether the remedy is effective and functioning as designed. Begin with a brief statement of what the remedy is to accomplish (i.e., to contain contaminant plume, minimize infiltration and gas emission, etc.).
There are no issues with the OU!/OU2 remedy involving groundwater pump and treatment and continued monitoring of groundwater.

2. Adequacy of O&M

Describe issues and observations related to the implementation and scope of O&M procedures. In particular, discuss their relationship to the current and long-term protectiveness of the remedy.

There are no issues, the pump house is properly maintained

3. Early Indicators of Potential Remedy Problems

Describe issues and observations such as unexpected changes in the cost or scope of O&M or a high frequency of unscheduled repairs that suggest that the protectiveness of the remedy may be compromised in the future.

No problems

4. Early Indicators of Potential Remedy Problems

Describe possible opportunities for optimization in monitoring tasks or the operation of the remedy.

APPENDIX F

FYR Inspection Photo Log

Better Brite Plating Company Chrome and Zinc Shops Superfund Site

EPA FYR Inspection May 14, 2019

Lauren McCarrell, RPM, EPA R5

Photo 1
Description: additional asphalt parking lot for resale shop
Location: Zinc Shop

Photo 2
Description: additional asphalt parking lot south of pump and treat system
Location: Zinc Shop

Photo 3
Description: building addition to resale shop
Location: Zinc Shop

Photo 4
Description: Pump and treatment system house and additional parking lot in background
Location: Zinc Shop

Photo 5
Description: Sump for pump and treat system
Location: Zinc Shop

APPENDIX G

Green Bay Press Gazette FYR Notification

Former Outagamie sheriff candidate charged with child porn

Alison Dirr Appleton Post-Crescent
USA TODAY NETWORK - WISCONSIN

OSHKOSH - A recent candidate for Outagamie County sheriff was charged Thursday in federal court with distribution and possession of child pornography.

Alex Bebris, 49, of Neenah faces a mandatory minimum of five years and a maximum of 20 years in federal prison if convicted, according to a statement from the U.S. Department of Justice.

In September, Facebook told the National Center for Missing and Exploited Children that a user had sent child pornography images through its messenger system to another user. The Wisconsin Internet Crimes Against Children Taskforce found that the images were sent from the IP address at Bebris' residence, according to the statement.


Bebris

His residence was searched on Wednesday.

"A preliminary forensic examination of the hard drive on Bebris' computer revealed images of pornography involving children ranging in age from approximately one to ten years old," according to the statement.

Bebris was booked into the Winnebago County Jail about 12:45 p.m. on Wednesday, the jail said previously.

Bebris, one of three Republican candidates who ran to succeed retiring Outagamie County Sheriff Brad Gehring, did not advance in the Aug. 14 primary.

According to the criminal complaint, on Dec. 13, the Winnebago County Sheriff's Department was contacted by a member of the Wisconsin Internet Crimes Against Children Taskforce regarding two cybertips.

Investigators from the sheriff's department and the Wisconsin Department of Justice Division of Criminal Investigation searched Bebris' apartment Wednesday morning, Sheriff's Lt. Chris Braman told USA TODAY NETWORK-Wisconsin.

Bebris told investigators that he lives alone at the apartment, the complaint states.

Investigators seized "quite a few" electronic devices, and a Division of Criminal Investigation analyst performed initial forensic tests on those devices at the home. That allows investigators in such cases to quickly access images and determine whether to make an arrest, Braman said.

The criminal complaint states a computer was seized from a bedroom in the apartment, and a DCI analyst found 89 files "of interest" on the computer's hard drive.

Investigators who reviewed the images saw "numerous images that meet the state and federal statutory requirements for child pornography," the complaint states. The seized devices will be sent to the Wisconsin State Crime Laboratory in Madison, where analysts will perform a more detailed analysis.

Bebris was arrested "as a result of evidence seized during the search," the sheriff's department said in the statement Thursday.

"We're really early on in the investigation," Braman said. "We just got the tip last week. And we have to get enough information to do the search warrant, and we try to do it as soon as we can, as safely as we can. There's more investigation on the back end of these types of cases."

Bebris was present during the search and cooperated with investigators.

From 2006 to 2017, Bebris served as director of public safety — a dual role of police chief and fire chief — for Oakwood, Ohio, a suburb of Dayton. He returned to Wisconsin in November with plans to retire from law enforcement and to start new businesses.

TODAY'S MARKET REPORT

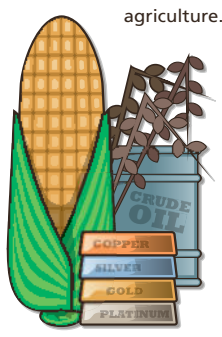
PRESS-GAZETTE INDEX

The Press-Gazette Index consists of 44 publicly traded companies either based in Wisconsin or with significant local operations. A full list of stocks and activity is available online at **www.greenbaypressgazette.com.**

NAME	DIV	YLD	PE	LAST	CHG	YEAR %CHG
AT&T Inc	2.04	7.1	6	28.65	-1.17	-16.4
AMD	...			17.94	-.22	+65.8
AlliantEg s	1.34	3.1	22	43.82	+.10	+5.4
AsscdBanc	0.68	3.5	12	19.38	-.03	-21.6
BkofAm	0.60	2.5	11	24.11	-.07	-16.1
BkMont g	4.00		7	65.65	-.37	-12.2
Bemis	1.24	2.8	18	44.96	-.80	-0.6
ChesEng	...		3	1.84	-.18	-44.0
DeanFoods	0.12	3.1	28	3.93	-.27	-61.1
Gannett n	0.64	6.8		9.36	-.09	-15.0
GenElec	0.04	.5		7.44	-.22	-53.7
HarleyD	1.48	4.5	11	33.01	-.24	-32.2
HeartFn	0.56	1.3	14	44.08	+.01	-17.2
Humana	2.00	.7	23	278.09	-5.20	+16.1
iShEMkts	0.59	1.5		38.79	+.30	-14.1
iS Eafe	1.66	2.8		58.58	-.24	-13.1
IntPap	1.90	4.8	13	39.56	-1.04	-26.4
Inv QQQ	1.31	.9		152.29	-2.24	-1.5
JPMorgCh	2.24	2.3	13	96.45	-.84	-6.3
JohnContl n	1.04	3.4	21	30.49	-.34	-14.9
KimbClk	4.00	3.5	25	114.07	+.19	-2.2
Kohls	2.44	4.1	10	59.97	-1.69	+21.2
MGE Engy	1.35	2.0	29	66.82	-.33	+10.3
Manitowc rs	...			14.22	-.24	-63.5
Marcus	0.60	1.5	31	38.81	-1.09	+45.4
Mondelez	1.04	2.5	20	41.16	-.25	-2.1
NicoletBc n	...		13	47.85	+1.50	-17.4
OshkoshCp	0.96	1.6	14	60.61	-1.47	-29.7
Plexus	...			50.51	-1.01	-16.2
ProctGam	2.87	3.2	22	90.98	-.78	+3.2
RegalBel	1.12	1.6	12	68.32	-1.17	-9.7
S&P500ETF	4.13	1.7		247.17	-4.09	-4.7
SchndrNt n	0.24	1.3		18.33	-.29	-32.3
SnapOn	3.80	2.7	13	139.95	-2.30	-15.5
SPDR Fncl	0.46	2.0		23.40	-.21	-14.4
TreeHseF	...		16	50.83	-.52	+5.2
UnilevNV	1.43	2.6		54.21	+.04	-1.6
US Bancrp	1.48	3.2	12	45.77	-.45	-13.0
UtdhlthGp	3.60	1.5	22	242.44	-7.87	+14.3
VanEGold	0.06	.3		20.67	+.72	-9.9
WEC Engy	2.21	3.1	23	71.74	+.43	+11.2
WalMart	2.08	2.4	50	87.28	-3.27	-6.2
WellsFargo	1.72	3.7	11	46.04	+.37	-21.6
Weyerhsr	1.36	6.1	17	22.22	-.98	-30.9

WISCONSIN COMMODITIES

A look at the market prices of select raw materials and agriculture.



AGRICULTURE	HIGH	LOW	SETTLE	CHG.
Corn	382.75	375	375.25	-6.50
Soybeans	905.50	892.75	893.50	-6.50
Oats	287.25	277.25	278.25	-8.25
Live Cattle	120.42	119.22	120.22	+.50
Feeder Cattle	147.67	145.67	147.42	+1.22
Lean Hogs	63.42	61.80	62.37	-.33
Wheat	527.75	521.25	523.50	+1
Lumber	339.7	332.7	334.8	-1.0

FUELS	CLOSE	PVS	%CHG	%YTD
RBOB Gas	1.32	1.39	-4.61	-26.50
Crude Oil	45.88	47.96	-4.77	-24.06
Nat Gas	3.58	3.73	-3.84	+21.33
Heating Oil	1.75	1.81	-3.09	-15.70

METALS	CLOSE	PVS	%CHG	%YTD
Copper	2.70	2.72	-.72	-17.61
Gold	1263.60	1252.10	+.92	-3.27
Platinum	795.80	796.00	-.03	-14.81
Silver	14.75	14.70	+.35	-13.52

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APPENDIX H

2019 Summary Groundwater Monitoring Report

ENGINEERING
ARCHITECTURE
ENVIRONMENTAL
PLANNING

OMNNI ASSOCIATES, INC.
ONE SYSTEMS DRIVE
APPLETON, WI 54914-1654
TEL: 920-735-6900

June 28, 2019

Mr. Keld Lauridsen
Hydrogeologist/Project Manager
WDNR-Northeast Region RR
2984 Shawano Avenue
Green Bay, WI 54313-6727

RE: Summary of the May 14 & 15, 2019 groundwater sampling events at the former Better Brite Chrome and Zinc Shops.

Dear Keld:

The purpose of this letter report is to summarize the groundwater sampling events conducted on May 14 & 15, 2019 at the former Better Brite chrome and zinc shops. The former Better Brite facilities are located at 519 Lande Street (chrome shop, BRRTS # 02-05-000030) and 315 S. 6th Street (zinc shop, BRRTS # 02-05-000031), De Pere, Wisconsin. (See Figure 1 – Site Location Map.) This report includes:

- Figure 1 – Site Location Map
- Figure 2 – Monitoring Wells – Chrome Site
- Figure 3 – Monitoring Wells – Zinc Site
- Well Specific Field Sheets
- Table 1 – Groundwater Analytical Summary, Better Brite – Chrome Shop
- Table 2 – Groundwater Analytical Summary, Better Brite – Zinc Shop
- Monitoring Well Photograph Summary
- Laboratory Report

Groundwater elevations were only taken at the monitoring points that were sampled. Groundwater elevations were recorded on the well specific field sheets. (See Well Specific Field Sheets.)

Monitoring points W-1 and W-1A would allow the water level meter probe to be placed down the PVC pipe. However, a standard bailer would not freely go down the PVC pipe. (See Monitoring Well Photograph Summary.) A peristaltic pump was used to collect the samples. FOTH purged these monitoring points several times in the weeks leading up to OMNNI's sampling.

Monitoring well covers were inspected at all monitoring points that could be located during the sampling event. The conditions of the covers were noted on the well specific field sheets and photographs of the covers were taken. (See Well Specific Field Sheets and Monitoring Well Photograph Summary.)

Color, odor, and turbidity observations were recorded on well specific field sheets. The well specific field sheets also list the measured depth to water from the top of the PVC pipe, mean sea level groundwater elevation, the length of time spent purging and the approximate gallons of groundwater purged from each monitoring well/piezometer prior to taking the groundwater sample. (See Well Specific Field Sheets.)

Purged groundwater from the monitoring wells and piezometers was collected in 5-gallon buckets. The purged groundwater was placed into the sump in the treatment building located at the former zinc shop site for treatment.

Unfiltered groundwater samples collected from the monitoring wells and zinc shop sump were submitted for laboratory hexavalent chromium analysis. Unfiltered groundwater from the zinc shop sump was also analyzed for cyanide and volatile organic compounds (VOCs). Unfiltered groundwater from monitoring well MW-116 was also analyzed for VOCs. Groundwater analytical methods are included with the laboratory report. (See Laboratory Report.) The laboratory analysis has been summarized in Table 1 and Table 2. (See Table 1 – Groundwater Analytical Summary, Better Brite – Chrome Shop and Table 2 - Groundwater Analytical Summary, Better Brite – Zinc Shop.)

All monitoring locations had lower hexavalent chromium laboratory analysis results than recent events, with the exception of MW-111 which was the same as the 2018 sampling event. In general, VOC results for the zinc shop sump and MW-116 were similar when compared to past sampling events. Groundwater enforcement standard exceedances for hexavalent chromium remain at both sites. At the former chrome shop site, the hexavalent chromium groundwater enforcement standard exceedance remains in MW-116. Groundwater enforcement standard and preventive action limit exceedances of VOCs remain in MW-116. At the former zinc shop site, the hexavalent chromium groundwater enforcement standard was exceeded in monitoring points W-1, W-1A, MW-6, MW-10 and the sump. Groundwater preventive action limit exceedance for cyanide was found in the sump.

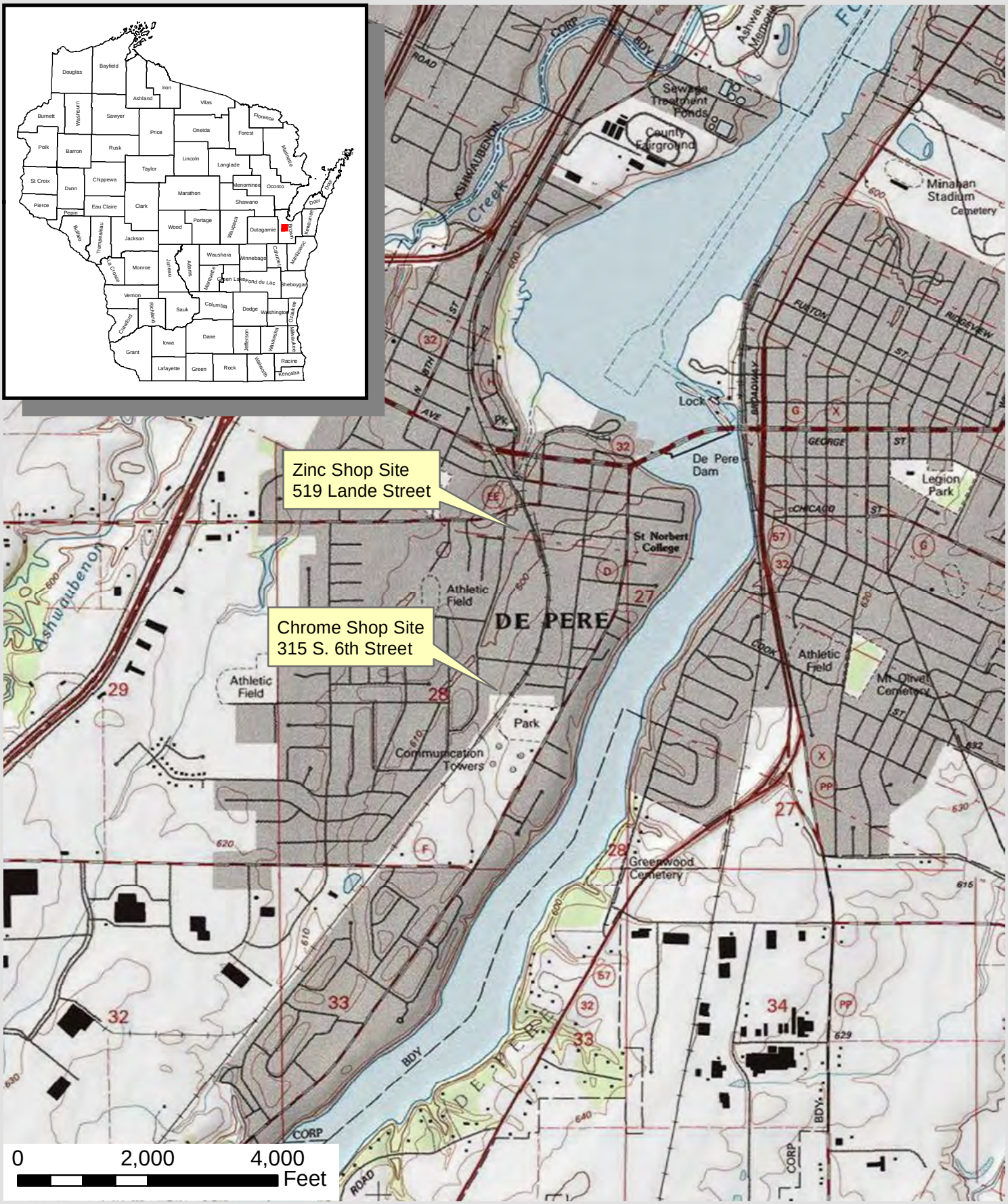
If you have any questions on the enclosed information, please contact me at 920/830-6174 or by email at kkennedy@omnni.com.

Sincerely,
OMNNI Associates, Inc.

Kimberly Kennedy

Kimberly Kennedy
Environmental Techniciain

Attachments



OMNI ASSOCIATES

ONE SYSTEMS DRIVE PHONE (920) 735-6900
APPLETON, WI 54914 FAX (920) 830-6100

N
W E
S

FORMER BETTER BRITE

SITE LOCATION MAP

315 S. 6TH STREET AND 519 LANDE STREET
CITY OF DEPERE, BROWN COUNTY, WISCONSIN

Project Manager:	BDW
Project Engineer:	BDW
Drawn By:	JCW
Checked By:	BDW
Date:	1/13/2014

SCALE: 1 " = 2,000 feet

PROJECT NO. **N1969A07**

FIGURE NO. **1**

F:\ENVIRO\N1969A07 (Better Brite State Lead)\GIS\SiteLocationmap.mxd

N
W E
S

Project Manager:	BDW	
Project Engineer:	BDW	
Drawn By:	JCW	
Checked By:	BDW	
Date:		11/5/2015

BETTER BRITE

MONITORING WELLS - CHROME SITE

CITY OF DE PERE
BROWN COUNTY, WISCONSIN

OMNI ASSOCIATES
ONE SYSTEMS DRIVE
APPLETON, WI 54914
PHONE (920) 735-6900
FAX (920) 830-6100

SCALE:
1 " = 50 '

PROJECT NO.
N1969A07

FIGURE NO.
2

F:\ENVIRON\1969A07 (Better Brite State Lead)\GIS\Basemap_Chrome.mxd

Project Manager:	BDW
Project Engineer:	BDW
Drawn By:	JCW
Checked By:	BDW
Date:	11/5/2015

BETTER BRITE

MONITORING WELLS - ZINC SITE

CITY OF DE PERE
BROWN COUNTY, WISCONSIN

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ONE SYSTEMS DRIVE APPLETON, WI 54914
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SCALE:
1 " = 50 '

PROJECT NO.
N1969A07

FIGURE NO.
3

F:\ENVIRON\1969A07 (Better Brite State Lead)\GIS\Basemap_Zinc.mxd

Well Specific Field Sheets

Facility Name: Former Better Brite - Chrome Shop
Date: May 15, 2019
Weather Conditions: Sunny, 75F
Person(s) Sampling: Kim Kennedy
Sampling Equipment: Dedicated bailers, Solonist 101 water level meter.

Well Name	MW101	MW104A	MW106	MW106A	MW107	MW107A	MW108	MW108A	MW110	MW110A	MW111	MW112	MW13	MW115	MW115A	MW116
Top of PVC Casing Elevation (MSL)			606.21	606.36	608.41	608.33	604.22	604.44	603.05	603.31	600.76	600.61	611.08	601.04	601.01	604.28
Depth to Bottom of Well (ft)		18.30	14.65	32.09		39.33	15.82	33.27	14.76	23.80	14.38	15.86	15.08	14.48	23.45	18.88
Water Elevation (MSL)	–	–	–	–	–	–	–	–	–	–	596.83	–	–	597.69	589.49	602.70
Measured Depth to Water (ft)	–	–	–	–	–	–	–	–	–	–	3.93	–	–	3.35	11.52	1.58
Time Purging Begun	–	–	–	–	–	–	–	–	–	–	10:43 AM	–	–	11:20 AM	11:07 AM	10:17 AM
Time Purging Completed	–	–	–	–	–	–	–	–	–	–	10:52 AM	–	–	11:31 AM	11:16 AM	10:27 AM
Amount Purged (gal)	–	–	–	–	–	–	–	–	–	–	7.0	–	–	7.0	7.5	11.3
Purged Dry? (Y/N)	–	–	–	–	–	–	–	–	–	–	N	–	–	Y	Y	N
Color (Y/N)	–	–	–	–	–	–	–	–	–	–	N	–	–	N	N	YELLOW
Odor (Y/N)	–	–	–	–	–	–	–	–	–	–	N	–	–	N	SLIGHT	N
Turbidity (Y/N)	–	–	–	–	–	–	–	–	–	–	Y	–	–	Y	Y	N
Time Sample Withdrawn	–	–	–	–	–	–	–	–	–	–	10:52 AM	–	–	11:36 AM	11:32 AM	10:27 AM
Well secured? (Y/N)	–	–	–	–	–	–	–	–	–	–	Y	–	–	Y	Y	Y
Cover Condition	Cover in good condition. Both bolts secure.	Cover in good condition. Both bolts secure.	Cover in good condition. Both bolts secure.	Cover in good condition. Both bolts secure.	One bolt snapped off. Cover in good condition.	Cover in good condition. Both bolts secure.	Concrete surround slightly moves. Both bolts secure.	Cover in good condition. Both bolts secure.	Cover in good condition. Both bolts secure.	Cover in good condition. Both bolts secure.	Cover in good condition. Both bolts secure.	Cover in good condition. Both bolts secure.	Cover in good condition. Both bolts secure.	Cover in good condition. Both bolts secure.	Cover in good condition. Both bolts secure.	Cover in good condition. Both bolts secure.

Purge 2" Well = (Depth to Bottom of Well - Measured Depth to Water) x 0.163 x 4

Well Specific Field Sheets

Facility Name: Former Better Brite - Zinc Shop
Date: May 14, 2019
Weather Conditions: Sunny, 73F
Person(s) Sampling: Kim Kennedy
Sampling Equipment: Dedicated bailers, Solonist 101 water level meter, perastaltic pump for W-1, W-1A.

Well Name	**W-1** (1,2,4)	**W-1A** (1,2,4)	**MW2**	**MW3R**	**MW5**	**MW5A**	**MW6** (4)	**MW6A** (4)	**MW7**	**MW7A**	**MW8**	**MW8A**	**MW9**	**MW10** (4)	**MW11**	**MW12**	**Zinc Sump** (3)
Top of PVC Casing Elevation (MSL)				602.88	600.81	600.81			600.60	600.51	598.18	598.59	601.66		602.41	599.65	603.99
Depth to Bottom of Well (ft)	19.9	31.54	17.65	16.72	15.30	29.72	18.43	18.48	15.86	26.73	11.41	21.73	16.30	14.77	15.62	10.04	20.40
Water Elevation (MSL)	–	–	–	595.83	593.15	–	–	–	–	–	–	–	594.77	–	–	–	–
Measured Depth to Water (ft)	13.73	15.75	–	7.05	7.66	–	10.80	–	–	–	–	–	6.89	4.85	–	–	–
Time Purging Begun	Grab Sample (3)	Grab Sample (3)	Grab Sample (3)	12:32 PM	1:33 PM	–	11:18 AM	–	–	–	–	–	9:43 AM	10:31 AM	–	–	–
Time Purging Completed				12:41 PM	1:43 PM	–	11:27 AM	–	–	–	–	–	9:56 AM	10:45 AM	–	–	–
Amount Purged (gal)				6.3	5.0	–	5.0	–	–	–	–	–	6.3	6.5	–	–	–
Purged Dry? (Y/N)				N	N	–	N	–	–	–	–	–	N	N	–	–	–
Color (Y/N)	L. YELLOW	N	–	N	N	–	N	–	–	–	–	–	N	N	–	–	YELLOW
Odor (Y/N)	N	N	–	N	N	–	N	–	–	–	–	–	N	N	–	–	N
Turbidity (Y/N)	Y	N	–	N	N	–	N	–	–	–	–	–	N	N	–	–	N
Time Sample Withdrawn	12:11 PM	11:58 AM	–	12:41 PM	1:43 PM	–	11:27 AM	–	–	–	–	–	9:56 AM	10:45 AM	–	–	1:08 PM
Well secured? (Y/N)	Y	Y	–	Y	Y	–	Y	–	–	–	–	–	Y	Y	–	–	Y
Cover Condition	Cover in good condition. Both bolts secure.	Cover in good condition. Both bolts secure.	Pro-top in good condition (some rust). Lock secure.	One bolt snapped off. Cover in good condition.	Cover in good condition. Both bolts secure.	Cover in good condition. Both bolts secure.	Pro-top in good condition (some rust). Lock secure.	Pro-top in good condition (some rust). Lock secure.	Cover in good condition. Both bolts secure.	Cover in good condition. Both bolts secure.	Cover in good condition. Both bolts secure.	Cover in good condition. Both bolts secure.	Cover in good condition. Both bolts secure.	Cover is flush when bolted, but well and plug are raised when cover is off. Both bolts secure.	Cover in good condition. Both bolts secure.	Cover in good condition. Both bolts secure.	Gate overgrown with vegetation. Cover in good condition. Locks secure.

1 Depth to bottom of the well is suspect. Felt like soft bottom (sediment).

2 A standard bailer would not fit down the monitoirng well.

3 Sump was not running at time of sample collection.

4 Well height modified. New elevation unknown.

Purge 2" Well = (Depth to Bottom of Well - Measured Depth to Water) x 0.163 x 4

Table 1 Groundwater Analytical Summary, Better Brite - Chrome Shop

519 Lande Street, De Pere, WI BRRTS # 02-05-000030

Sample Location	Date	Detected Parameters (µg/L)																						
		Hexavalent Chromium	Chromium	Iron	Sulfate	Sulfide	Antimony	Arsenic	Cadmium	Cyanide	Nickel	Silver	Thallium	Cobalt	Vanadium	1,1-DCA	1,2-DCA	1,1-DCE	cis-1,2-DCE	PCE	1,1,1-TCA	1,1,2-TCA	TCE	VC
NR140 Preventive Action Limit		10	10	150	125,000	NO PAL	1.2	1	0.5	40	20	10	0.4	8	6	85	0.5	0.7	7	0.5	40	0.5	0.5	0.02
NR140 Enforcement Standard		100	100	300	250,000	NO ES	6	10	5	200	100	50	2	40	30	850	5	7	70	5	200	5	5	0.2
Chrome Sump (Abandoned)	Aug-94	**620000**	**694000**	NA	NA	NA																		
	Oct-94	**300200**	**297000**	NA	NA	NA																		
	Apr-98	**195000**	**192000**	NA	NA	NA																		
	Jul-98	**132000**		NA	NA	NA																		
French Drain	Aug-94	**25800**	**22000**	NA	NA	NA																		
	Oct-94	**32000**	**31700**	NA	NA	NA																		
	Apr-98	**1060**	**1010**	NA	NA	NA																		
	Jul-98	**336**	**312**	NA	NA	NA																		
B-101	Aug-94	<10	<3.4	NA	NA	NA																		
	Oct-94	<10		NA	NA	NA																		
MW-106	Aug-94	7	<2.8	NA	NA	NA																		
	DUP.	<10	<2.8	NA	NA	NA																		
	Oct-94	<10 J	<3.4 J	NA	NA	NA																		
	DUP.	<10 J	<3.4 J	NA	NA	NA																		
	Apr-98	<10	<5	NA	NA	NA																		
	DUP	<10	<5	NA	NA	NA																		
	May-00	<4.2	4	NA	NA	NA																		
	8/26/10	<3.9	5.4	NA	NA	NA																		
	6/16/11	<3.9	NA	NA	NA	NA																		
MW-106A	Aug-94	<10	<2.8	NA	NA	NA																		
	Oct-94	<10 J	<3.4 J	NA	NA	NA																		
	Apr-98	<10	<5	NA	NA	NA																		
	May-00	<4.2	9.4	NA	NA	NA																		
	8/26/10	<3.9	1.1"J"	NA	NA	NA																		
	6/16/11	<3.9	NA	NA	NA	NA																		
MW-106B (Abandoned)	Aug-94	<10	NA	NA	NA	NA																		
MW-107	Aug-94	<10	4.1 BJ	NA	NA	NA																		
	Oct-94	<10 J	<3.4	NA	NA	NA																		
	Apr-98	<10	<5	NA	NA	NA																		
	May-00	<4.2	4.2	NA	NA	NA																		
	Jun-01	NA	NA	**530**	50	NA																		
	Nov-01	<4.2	26	**3900**	NA	1800																		
	May-02	7.8	1.2	230	NA	2300																		
	DUP	**100**	1.9	**490**	NA	2800																		
	Nov-02	NA	NA	**8200**	140000	2300																		
	May-03	<4.2	1.6	**490**	95000	1700																		
	May-04	6.5	1.7	260	100000	NA																		
	May-05	<5.0	0.89	380	97000	NA																		
	8/26/10	<3.9	16.4	**4010**	16400	NA																		
	6/16/11	<3.9	NA	**3130**	83600	NA																		
MW-107A	Aug-94	<10	<2.8	NA	NA	NA																		
	Oct-94	<10 J	<3.4 J	NA	NA	NA																		
	Apr-98	<10	<5	NA	NA	NA																		
	May-00	<4.2	16	NA	NA	NA																		
	8/26/10	<3.9	23.2	NA	NA	NA																		
	6/16/11	<3.9	NA	NA	NA	NA																		
MW-107B (Abandoned)	Aug-94	<10	NA	NA	NA	NA																		

NA - Compound not analyzed
Underlined - Concentration exceeds PAL
Bolded - Concentration exceeds ES

Table 1 Groundwater Analytical Summary, Better Brite - Chrome Shop
519 Lande Street, De Pere, WI BRRTS # 02-05-000030

Sample Location	Date	Detected Parameters (µg/L)																						
		Hexavalent Chromium	Chromium	Iron	Sulfate	Sulfide	Antimony	Arsenic	Cadmium	Cyanide	Nickel	Silver	Thallium	Cobalt	Vanadium	1,1-DCA	1,2-DCA	1,1-DCE	cis-1,2-DCE	PCE	1,1,1-TCA	1,1,2-TCA	TCE	VC
NR140 Preventive Action Limit		10	10	150	125,000	NO PAL	1.2	1	0.5	40	20	10	0.4	8	6	85	0.5	0.7	7	0.5	40	0.5	0.5	0.02
NR140 Enforcement Standard		100	100	300	250,000	NO ES	6	10	5	200	100	50	2	40	30	850	5	7	70	5	200	5	5	0.2
MW-108	Aug-94	<10	<2.8	NA	NA	NA																		
	Oct-94	<10	<3.4 J	NA	NA	NA																		
	Apr-98	<10	NA	NA	NA	NA																		
	DUP	<10	<5	NA	NA	NA																		
	Jul-09	NA	16.0	NA	NA	NA																		
	8/26/10	<3.9	4.6"J"	NA	NA	NA																		
	6/16/11	<3.9	NA	NA	NA	NA																		
	12/5/13	<3.4	NA	NA	NA	NA																		
MW-108A	Aug-94	<10	3.0 BJ	NA	NA	NA																		
	Oct-94	<10	<3.4 J	NA	NA	NA																		
	Apr-98	<10	<5	NA	NA	NA																		
	May-00	<4.2	55	NA	NA	NA																		
	Jul-09	NA	NA	NA	NA	NA																		
	8/26/10	<3.9	1.3"J"	NA	NA	NA																		
	6/16/11	<3.9	1.3"J"	NA	NA	NA																		
	12/5/13	<8.6	NA	NA	NA	NA																		
MW-108B (Abandoned)	Aug-94	<10	NA	NA	NA	NA																		
MW-109 (Abandoned)	Aug-94	**6780**	**9570**	NA	NA	NA																		
	Oct-94	**2400**	**1980**	NA	NA	NA																		
	DUP.	**3100**	**1700**	NA	NA	NA																		
	Apr-98	**16500**	**18600**	NA	NA	NA																		
	Jul-98	**12200**	**11100**	NA	NA	NA																		
MW-109A (Abandoned)	Aug-94	<10	<2.8	NA	NA	NA																		
	Oct-94	<10	1.3 B	NA	NA	NA																		
	Apr-98	<10	<5	NA	NA	NA																		
	Jul-98	<10	7	NA	NA	NA																		
MW-109B (Abandoned)	Aug-94	<10	NA	NA	NA	NA																		
	Oct-94	<10	NA	NA	NA	NA																		
MW-110	Aug-94	<10	3.6 BJ	NA	NA	NA																		
	Oct-94	<10	<3.4 J	NA	NA	NA																		
	Apr-98	<10	<5	NA	NA	NA																		
	May-00	<4.2	37	NA	NA	NA																		
	May-04	<2.5	11	**3400**	230000	NA																		
	May-05	<5.0	0.89	82	70000	NA																		
	Oct-06	<6.8	1.8	NA	NA	NA																		
	8/21/07	NA	7.4	NA	NA	NA																		
	7/21/09	NA	5.3	NA	NA	NA																		
	8/26/10	<3.9	2.0 J	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	<0.75	NA	<0.57	NA	<0.45	<0.9	NA	<0.48	<0.18
	6/16/11	<3.9	NA	NA	NA	NA																		
	10/24/12	<3.9	NA	NA	NA	NA																		
	12/5/13	<3.4	NA	NA	NA	NA																		

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Table 1 Groundwater Analytical Summary, Better Brite - Chrome Shop
519 Lande Street, De Pere, WI BRRTS # 02-05-000030

Sample Location	Date	Detected Parameters (µg/L)																						
		Hexavalent Chromium	Chromium	Iron	Sulfate	Sulfide	Antimony	Arsenic	Cadmium	Cyanide	Nickel	Silver	Thallium	Cobalt	Vanadium	1,1-DCA	1,2-DCA	1,1-DCE	cis-1,2-DCE	PCE	1,1,1-TCA	1,1,2-TCA	TCE	VC
NR140 Preventive Action Limit		10	10	150	125,000	NO PAL	1.2	1	0.5	40	20	10	0.4	8	6	85	0.5	0.7	7	0.5	40	0.5	0.5	0.02
NR140 Enforcement Standard		100	100	300	250,000	NO ES	6	10	5	200	100	50	2	40	30	850	5	7	70	5	200	5	5	0.2
MW-110A	Aug-94	<10	<2.8	NA	NA	NA																		
	Oct-94	<10	<3.4 J	NA	NA	NA																		
	Apr-98	<10	<5	NA	NA	NA																		
	May-00	<4.2	25	NA	NA	NA																		
	Oct-06	<6.8	4.2	NA	NA	NA																		
	8/21/07	NA	1.9	NA	NA	NA																		
	7/21/09	NA	1.3	NA	NA	NA																		
	8/26/10	<3.9	1.8 J	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	<0.75	NA	<0.57	NA	<0.45	<0.9	NA	<0.48	<0.18
	6/16/11	<3.9	NA	NA	NA	NA																		
MW-111	Aug-94	<10	<3.4	NA	NA	NA																		
	DUP.	<10	<3.4	NA	NA	NA																		
	Oct-94	<10	<0.70	NA	NA	NA																		
	Apr-98	**226**	<5	NA	NA	NA																		
	Jul-98	22	27	NA	NA	NA																		
	Nov-98	<0.5	<0.5	NA	NA	NA																		
	May-00	<4.2	36	NA	NA	NA																		
	Nov-02	<4.2	43	**4400**	130000	2600																		
	DUP	<4.2	38	**3400**	100000	280																		
	May-03	5.2	33	**2700**	98000	1400																		
	May-04	50	**150**	**5000**	93000	NA																		
	May-05	**250**	**260**	200	87000	NA																		
	Nov-05	<5.0	39	**12000**	98000	NA																		
	DUP	<5.0	55	**21000**	96000	NA																		
	Oct-06	<6.8	16	NA	NA	NA																		
	8/21/07	NA	25	NA	NA	NA																		
	7/21/09	NA	23.6	NA	NA	NA																		
	8/26/10	<3.9	19.8	NA	NA	NA																		
	6/16/11	<3.9	NA	NA	NA	NA																		
	10/24/11	<3.9	NA	NA	NA	NA																		
	10/24/12	<3.9	NA	NA	NA	NA																		
	12/5/13	<3.4	NA	NA	NA	NA																		
	10/22/15	<3.9	NA	NA	NA	NA																		
	9/20/16	<51	NA	NA	NA	NA																		
	6/13/18	<130	NA	NA	NA	NA																		
	5/15/19	<130	NA	NA	NA	NA																		
MW-112	Oct-94	<10	<0.70	NA	NA	NA																		
	Nov-94	<10	<2.5	NA	NA	NA																		
	Apr-98	<10	<5	NA	NA	NA																		
	May-00	<4.2	4.1	NA	NA	NA																		
	8/26/10	<3.9	3.9	NA	NA	NA																		
	6/16/11	<3.9	NA	NA	NA	NA																		
MW-113	Aug-94	**140**	99.7	NA	NA	NA																		
	Oct-94	<10 J	8.6 B	NA	NA	NA																		
	May-95	43	20.3	NA	NA	NA																		
	Apr-98	<10	<5	NA	NA	NA																		
	Jul-98	<10	12	NA	NA	NA																		
	May-00	<4.2	22	NA	NA	NA																		
	8/26/10	<3.9	24.3	NA	NA	NA																		
	6/16/11	<3.9	NA	NA	NA	NA																		

NA - Compound not analyzed
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Table 1 Groundwater Analytical Summary, Better Brite - Chrome Shop

519 Lande Street, De Pere, WI BRRTS # 02-05-000030

Sample Location	Date	Detected Parameters (µg/L)																						
		Hexavalent Chromium	Chromium	Iron	Sulfate	Sulfide	Antimony	Arsenic	Cadmium	Cyanide	Nickel	Silver	Thallium	Cobalt	Vanadium	1,1-DCA	1,2-DCA	1,1-DCE	cis-1,2-DCE	PCE	1,1,1-TCA	1,1,2-TCA	TCE	VC
NR140 Preventive Action Limit		10	10	150	125,000	NO PAL	1.2	1	0.5	40	20	10	0.4	8	6	85	0.5	0.7	7	0.5	40	0.5	0.5	0.02
NR140 Enforcement Standard		100	100	300	250,000	NO ES	6	10	5	200	100	50	2	40	30	850	5	7	70	5	200	5	5	0.2
MW-114 (Abandoned)	Mar-95	<10 J	<2.9	NA	NA	NA																		
	DUP.	<10 J	<2.9	NA	NA	NA																		
	May-95	<10 J	<1.0	NA	NA	NA																		
	DUP.	<10 J	<1.0	NA	NA	NA																		
	Apr-98	<10	<5	NA	NA	NA																		
MW-115	May-00	<4.2	6.0	NA	NA	NA																		
	Jun-01	<4.2	<0.52	160	92	NA																		
	Nov-01	<4.2	12	**1100**	NA	3000																		
	DUP	<4.2	10	**3300**	NA	3300																		
	May-02	<4.2	38	**19000**	NA	2800																		
	Nov-02	<4.2	38	**7000**	130000	3100																		
	May-03	<4.2	**260**	**9700**	90000	1400																		
	DUP	<4.2	56	**3600**	89000	1400																		
	May-04	<2.5	1.3	130	34000	NA																		
	May-05	<5.0	1.1	**320**	44000	NA																		
	Oct-06	<6.8	2.6	NA	NA	NA																		
	8/21/07	NA	10	NA	NA	NA																		
	7/21/09	NA	5.8	NA	NA	NA																		
	8/26/10	<3.9	1.6 J	**3530**	24800	NA																		
	6/16/11	<3.9	NA	**4460**	10000	NA																		
	10/24/11	<3.9	NA	NA	NA	NA																		
	10/24/12	<3.9	NA	NA	NA	NA																		
	12/5/13	<5.7	NA	NA	NA	NA																		
	10/16/14	<3.9	NA	NA	NA	NA																		
	10/22/15	<3.9	NA	NA	NA	NA																		
	9/20/16	<26	NA	NA	NA	NA																		
	6/13/18	<130	NA	NA	NA	NA																		
	5/15/19	<51	NA	NA	NA	NA																		
MW-115A	May-00	<4.2	12.0	NA	NA	NA																		
	Oct-06	<6.8	4.6	NA	NA	NA																		
	8/21/07	NA	2.7	NA	NA	NA																		
	7/21/09	NA	2.9	NA	NA	NA																		
	8/26/10	<3.9	1.4 J	NA	NA	NA																		
	6/16/11	<3.9	NA	NA	NA	NA																		
	10/24/12	<3.9	NA	NA	NA	NA																		
	12/5/13	<8.6	NA	NA	NA	NA																		
	10/16/14	<3.9	NA	NA	NA	NA																		
	10/22/15	<3.9	NA	NA	NA	NA																		
	9/20/16	<26	NA	NA	NA	NA																		
	6/13/18	<130	NA	NA	NA	NA																		
	5/15/19	<51	NA	NA	NA	NA																		

NA - Compound not analyzed
Underlined - Concentration exceeds PAL
Bolded - Concentration exceeds ES

Table 1 Groundwater Analytical Summary, Better Brite - Chrome Shop

519 Lande Street, De Pere, WI BRRTS # 02-05-000030

Sample Location	Date	Detected Parameters (µg/L)																					
		Hexavalent Chromium	Chromium	Iron	Sulfate	Sulfide	Antimony	Arsenic	Cadmium	Cyanide	Nickel	Silver	Thallium	Cobalt	Vanadium	1,1-DCA	1,2-DCA	1,1-DCE	cis-1,2-DCE	PCE	1,1,1-TCA	1,1,2-TCA	TCE	VC
NR140 Preventive Action Limit		10	10	150	125,000	NO PAL	1.2	1	0.5	40	20	10	0.4	8	6	85	0.5	0.7	7	0.5	40	0.5	0.5	0.02
NR140 Enforcement Standard		100	100	300	250,000	NO ES	6	10	5	200	100	50	2	40	30	850	5	7	70	5	200	5	5	0.2
MW-116	May-00	**1600**	**470**	NA	NA	NA																		
	DUP.	**1500**	**460**	NA	NA	NA																		
	Nov-00	37	23	NA	NA	NA																		
	DUP	46	24	NA	NA	NA																		
	Jun-01	**4400**	**2300**	**840**	2100	NA																		
	Nov-01	**3300**	**2100**	**690**	NA	2400																		
	May-02	**12000**	**7300**	**530**	NA	2500																		
	Nov-02	**5100**	**3200**	**720**	20000	2900																		
	May-03	**8900**	**6000**	**410**	**2700000**	1700																		
	May-04	**28000**	**22000**	43	19000	NA																		
	DUP	**28000**	**22000**	280	24000	NA																		
	May-05	**52000**	**52000**	**950**	**1900000**	NA																		
	DUP	**54000**	**53000**	**710**	**1800000**	NA																		
	Nov-05	**50000**	**61000**	**840**	**1800000**	NA																		
	Oct-06	**39000**	**36000**	**900**	**1800000**	NA																		
	DUP	**42000**	**36000**	NA	NA	NA																		
	8/21/07	NA	**39,000**	NA	NA	NA																		
	7/21/09	NA	**25,500**	NA	NA	NA																		
	8/26/10	**21,300**	**19,200**	**478**	**1330000**	NA	**162**	2.4 J	0.43 J	NA	10.3	<0.46	<2.2	NA	NA	30.9	NA	**22.1**	NA	3.2	76.9	NA	1.1	**0.21 J**
	8/26/10 LF	**20,200**	**17,700**	NA	NA	NA																		
	4/25/11	**34,600**	NA	NA	**1030000**	NA																		
	6/16/11	**13,800**	NA	240	**1660000**	NA	3.4 "J"	NA	NA	NA	NA	NA	NA	NA	NA	28.1	NA	**25.9**	NA	1.2	84.1	NA	2.2	<0.18
	10/24/11	**18,300**	NA	NA	NA	NA																		
	10/24/12	**22,300**	NA	NA	NA	NA																		
	12/5/13	**17,600**	NA	NA	NA	NA																		
	DUP	**17,500**	NA	NA	NA	NA																		
	10/16/14	**13,300**	NA	NA	NA	NA																		
	10/22/15	**16,500**	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	43.5	0.32 J	**40.6**	1.5	1.7	145	0.46 J	1.6	**0.27 J**
	9/20/16	**16,100**	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	34.8	<0.34	**34.8**	1.2 J	1.4 J	135	<0.39	1.5 J	<0.35
	6/13/18	**12,100**	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	34.4	<0.34	**37.4**	0.93 J	1.1 J	125	<0.39	1.5 J	<0.35
	5/15/19	**9,800**	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	38.9	<0.28	**44.3**	1.3	1.2	142	<0.55	2.1	<0.17
CSTW1	4/25/11	<3.9	NA	NA	**1,180,000**	NA																		
CSTW2	4/25/11	<3.9	NA	NA	**2,840,000**	NA																		
CSTW3	4/25/11	**1,000**	NA	NA	**2,010,000**	NA																		
CSTW4	4/25/11	<3.9	NA	NA	**426,000**	NA																		
CSTW5	4/25/11	4.9 "J"	NA	NA	**592,000**	NA																		
CSTW6	4/25/11	<3.9	NA	NA	**608000**	NA																		

NA - Compound not analyzed
Underlined - Concentration exceeds PAL
Bolded - Concentration exceeds ES

Table 2 Groundwater Analytical Summary, Better Brite - Zinc Shop
315 6th Street, De Pere, WI BRRTS # 02-05-000031

Sample Location	Date	Detected Parameters (µg/L)																			
		Hexavalent Chromium	Chromium	Iron	Sulfate	Sulfide	Antimony	Arsenic	Cadmium	Cyanide	Nickel	Silver	Thallium	Cobalt	Vanadium	1,1-DCA	1,1-DCE	PCE	1,1,1-TCA	TCE	VC
NR140 Preventive Action Limit		10	10	150	125,000	NO PAL	1.2	1	0.5	40	20	10	0.4	8	6	85	0.7	0.5	40	0.5	0.02
NR140 Enforcement Standard		100	100	300	250,000	NO ES	6	10	5	200	100	50	2	40	30	850	7	5	200	5	0.2
W-1	10/22/15	**10,300**	NA	NA	NA	NA	**(Grab Sample, no purging)**														
	9/19/16	**9600**	NA	NA	NA	NA	**(Grab Sample, previously purged)**														
	6/12/18	**6600**	NA	NA	NA	NA	**(Grab Sample, previously purged)**														
	5/14/19	**4400**	NA	NA	NA	NA	**(Grab Sample, previously purged)**														
W-1A	10/22/15	**3,300**	NA	NA	NA	NA	**(Grab Sample, no purging)**														
	9/19/16	**2800**	NA	NA	NA	NA	**(Grab Sample, previously purged)**														
	6/12/18	**2700**	NA	NA	NA	NA	**(Grab Sample, previously purged)**														
	5/14/19	**1800**	NA	NA	NA	NA	**(Grab Sample, previously purged)**														
PF-MW-2	May-00	<4.2	7.6	NA	NA	NA															
	Jun-01	<4.2	7.1	NA	NA	NA															
	Nov-01	<4.2	10	NA	NA	NA															
	May-02	<4.2	<0.52	NA	NA	NA															
	Nov-02	<4.2	2.4	NA	NA	NA															
	May-03	<4.2	49	NA	NA	NA															
	10/22/15	<3.9	NA	NA	NA	NA	**(Grab Sample, no purging)**														
	9/19/16	<5.1	NA	NA	NA	NA	**(Grab Sample, previously purged)**														
	6/13/18	<26	NA	NA	NA	NA	**(Grab Sample, previously purged)**														
MW-3/MW3R	May-00	**230**	**330**	NA	NA	NA															
	Nov-00	50	**130**	NA	NA	NA															
	Jun-01	**3500**	**2200**	NA	NA	NA															
	Nov-01	38	**1700**	NA	NA	NA															
	May-02	<4.2	**220**	NA	NA	NA															
	Nov-02	<4.2	18	NA	NA	NA															
	May-03	**110**	55	NA	NA	NA															
	Dup	83	49	NA	NA	NA															
	May-04	89	**190**	NA	NA	NA															
	May-05	<5.0	*17*	NA	NA	NA															
	7/21/09	NA	**717**	NA	NA	NA															
	8/24/10	**660**	**552**	NA	NA	NA															
	6/28/11	**2800**	NA	NA	NA	NA															
	10/24/11	**2200**	NA	NA	NA	NA															
	10/23/12	**560**	NA	NA	NA	NA															
	12/5/13	**140**	NA	NA	NA	NA															
	10/16/14	**190**	NA	NA	NA	NA															
	10/22/15	**100**	NA	NA	NA	NA															
	9/19/16	**380**	NA	NA	NA	NA															
	6/12/18	<130	NA	NA	NA	NA															
	5/14/19	88	NA	NA	NA	NA															

NA - Compound not analyzed
Underlined - Concentration exceeds preventive action limit
Bolded - Concentration exceeds enforcement standard

Table 2 Groundwater Analytical Summary, Better Brite - Zinc Shop
315 6th Street, De Pere, WI BRRTS # 02-05-000031

Sample Location	Date	Detected Parameters (µg/L)																			
		Hexavalent Chromium	Chromium	Iron	Sulfate	Sulfide	Antimony	Arsenic	Cadmium	Cyanide	Nickel	Silver	Thallium	Cobalt	Vanadium	1,1-DCA	1,1-DCE	PCE	1,1,1-TCA	TCE	VC
NR140 Preventive Action Limit		10	10	150	125,000	NO PAL	1.2	1	0.5	40	20	10	0.4	8	6	85	0.7	0.5	40	0.5	0.02
NR140 Enforcement Standard		100	100	300	250,000	NO ES	6	10	5	200	100	50	2	40	30	850	7	5	200	5	0.2
MW-4 (Abandoned)	Aug-94	<10	<3.4	NA	NA	NA															
	DUP	<10	<3.4	NA	NA	NA															
	Oct-94	<10 J	<3.4 J	NA	NA	NA															
	DUP	<10 J	<3.4 J	NA	NA	NA															
	Apr-98	<10	<5	NA	NA	NA															
	May-00	<4.2	4.6	NA	NA	NA															
	Nov-00	<4.2	2.4	NA	NA	NA															
	Jun-01	<4.2	12	NA	NA	NA															
	Nov-01	<4.2	7.4	NA	NA	NA															
	May-02	<4.2	1.4	NA	NA	NA															
	Nov-02	<4.2	15	NA	NA	NA															
	May-03	<4.2	27	NA	NA	NA															
	May-04	<2.5	1.8	NA	NA	NA															
	May-05	<5.0	9	NA	NA	NA															
	Nov-05	<5.0	12	NA	NA	NA															
MW-4A (Abandoned)	Aug-94	<10	<3.4	NA	NA	NA															
	Oct-94	<10 J	6.0 B	NA	NA	NA															
	Apr-98	<10	<5	NA	NA	NA															
	May-00	<4.2	8.7	NA	NA	NA															
	Nov-00	<4.2	3.7	NA	NA	NA															
	Jun-01	<4.2	3.7	NA	NA	NA															
	Nov-01	<4.2	13	NA	NA	NA															
	May-02	<4.2	38	NA	NA	NA															
	Nov-02	<4.2	28	NA	NA	NA															
	May-03	<4.2	32	NA	NA	NA															
	May-04	<2.5	0.75	NA	NA	NA															
	May-05	<5.0	2	NA	NA	NA															
	Nov-05	<5.0	2.8	NA	NA	NA															
MW-4B (Abandoned)	Oct-94	<10	<0.70	NA	NA	NA															
	Nov-94	<10	<2.5	NA	NA	NA															

NA - Compound not analyzed
Underlined - Concentration exceeds preventive action limit
Bolded - Concentration exceeds enforcement standard

Table 2 Groundwater Analytical Summary, Better Brite - Zinc Shop
315 6th Street, De Pere, WI BRRTS # 02-05-000031

Sample Location	Date	Detected Parameters (µg/L)																			
		Hexavalent Chromium	Chromium	Iron	Sulfate	Sulfide	Antimony	Arsenic	Cadmium	Cyanide	Nickel	Silver	Thallium	Cobalt	Vanadium	1,1-DCA	1,1-DCE	PCE	1,1,1-TCA	TCE	VC
NR140 Preventive Action Limit		10	10	150	125,000	NO PAL	1.2	1	0.5	40	20	10	0.4	8	6	85	0.7	0.5	40	0.5	0.02
NR140 Enforcement Standard		100	100	300	250,000	NO ES	6	10	5	200	100	50	2	40	30	850	7	5	200	5	0.2
MW-5	Aug-94	**1590**	**827**	NA	NA	NA															
	Oct-94	**460 J**	**299 J**	NA	NA	NA															
	DUP	**510 J**	**763 J**	NA	NA	NA															
	Apr-98	**212**	**631**	NA	NA	NA															
	DUP	**207**	**667**	NA	NA	NA															
	Jul-98	**1420**	**1230**	NA	NA	NA															
	May-00	**120**	**190**	NA	NA	NA															
	Nov-00	<4.2	6.6	NA	NA	NA															
	Jun-01	**590**	**450**	NA	NA	NA															
	Nov-02	**2200**	**2200**	NA	NA	NA															
	DUP	**2200**	**2200**	NA	NA	NA															
	May-03	**4900**	**3600**	NA	NA	NA															
	May-04	**4700**	**3100**	NA	NA	NA															
	May-05	**4000**	**3200**	NA	NA	NA															
	Oct-06	**4900**	**4000**	NA	NA	NA															
	8/21/07	NA	**2,700**	NA	NA	NA															
	7/21/09	NA	**2,210**	NA	NA	NA															
	8/24/10	**1,300**	**1,180**	NA	NA	NA															
	6/28/11	**970**	NA	NA	NA	NA															
	10/24/11	**1,100**	NA	NA	NA	NA															
	10/23/12	**970**	NA	NA	NA	NA															
	12/5/13	**1000**	NA	NA	NA	NA															
	10/22/15	**330**	NA	NA	NA	NA															
	9/19/16	**460**	NA	NA	NA	NA															
	6/12/18	**180**	NA	NA	NA	NA															
	5/14/19	<51	NA	NA	NA	NA															
MW-5A	Aug-94	<10	<3.4	NA	NA	NA															
	Oct-94	<10	<3.4 J	NA	NA	NA															
	Apr-98	<10	<5	NA	NA	NA															
	May-00	<4.2	6.5	NA	NA	NA															
	Nov-00	**340**	**380**	NA	NA	NA															
	Jun-01	<4.2	3.9	NA	NA	NA															
	Nov-02	<4.2	34	NA	NA	NA															
	May-03	<4.2	22	NA	NA	NA															
	DUP	<4.2	49	NA	NA	NA															
	May-04	<2.5	2.7	NA	NA	NA															
	May-05	<5.0	7.6	NA	NA	NA															
	8/24/10	<3.9	2.5"J"	NA	NA	NA															
	6/28/11	<3.9	NA	NA	NA	NA															
MW-5B (Abandoned)	Aug-94	NA	NA	NA	NA	NA															
	Oct-94	<10	<5	NA	NA	NA															

NA - Compound not analyzed
Underlined - Concentration exceeds preventive action limit
Bolded - Concentration exceeds enforcement standard

Table 2 Groundwater Analytical Summary, Better Brite - Zinc Shop
315 6th Street, De Pere, WI BRRTS # 02-05-000031

Sample Location	Date	Detected Parameters (µg/L)																			
		Hexavalent Chromium	Chromium	Iron	Sulfate	Sulfide	Antimony	Arsenic	Cadmium	Cyanide	Nickel	Silver	Thallium	Cobalt	Vanadium	1,1-DCA	1,1-DCE	PCE	1,1,1-TCA	TCE	VC
NR140 Preventive Action Limit		10	10	150	125,000	NO PAL	1.2	1	0.5	40	20	10	0.4	8	6	85	0.7	0.5	40	0.5	0.02
NR140 Enforcement Standard		100	100	300	250,000	NO ES	6	10	5	200	100	50	2	40	30	850	7	5	200	5	0.2
MW-6	Aug-94	**15900**	**39200**	NA	NA	NA															
	Oct-94	**47000**	**41,900 J**	NA	NA	NA															
	Apr-98	**7650**	**4560**	NA	NA	NA															
	May-00	**23000**	**26000**	NA	NA	NA															
	Nov-00	**26000**	**23000**	NA	NA	NA															
	Jun-01	**14000**	**15000**	NA	NA	NA															
	Nov-01	**25000**	**29000**	NA	NA	NA															
	May-02	**13000**	**13000**	NA	NA	NA															
	Nov-02	**21000**	**22000**	NA	NA	NA															
	May-03	**11000**	**9300**	NA	NA	NA															
	May-04	**13000**	**15000**	NA	NA	NA															
	May-05	**12000**	**11000**	NA	NA	NA															
	DUP	**12000**	**11000**	NA	NA	NA															
	Oct-06	**12000**	**12000**	NA	NA	NA															
	DUP	**14000**	**12000**	NA	NA	NA															
	8/21/07	NA	**8,900**	NA	NA	NA															
	7/21/09	NA	**10,400**	NA	NA	NA															
	8/24/10	**8400**	**7,540**	NA	NA	NA															
	6/28/11	**5200**	NA	NA	NA	NA															
	10/24/11	**6,500**	NA	NA	NA	NA															
	10/23/12	**7,300**	NA	NA	NA	NA															
	12/5/13	**6,100**	NA	NA	NA	NA															
	10/16/14	**3,300**	NA	NA	NA	NA															
	10/22/15	**360**	NA	NA	NA	NA															
	9/20/16	**3500**	NA	NA	NA	NA															
	6/13/18	**1400**	NA	NA	NA	NA															
	5/14/19	**1200**	NA	NA	NA	NA															
MW-6A	Aug-94	<10	4.9 B	NA	NA	NA															
	Oct-94	<10	<3.4 J	NA	NA	NA															
	Apr-98	<10	<5	NA	NA	NA															
	May-00	6.6	22	NA	NA	NA															
	Nov-00	<4.2	13	NA	NA	NA															
	6/01	<4.2	11	NA	NA	NA															
	Nov-01	<4.2	7.1	NA	NA	NA															
	May-02	<4.2	51	NA	NA	NA															
	Nov-02	<4.2	83	NA	NA	NA															
	May-03	<4.2	59	NA	NA	NA															
	May-04	<2.5	3.4	NA	NA	NA															
	May-05	<5.0	*12*	NA	NA	NA															
	8/24/10	<3.9	1.7"J"	NA	NA	NA															
	6/28/11	<3.9	NA	NA	NA	NA															
MW-6B (Abandoned)	Aug-94	<10	NA	NA	NA	NA															

NA - Compound not analyzed
Underlined - Concentration exceeds preventive action limit
Bolded - Concentration exceeds enforcement standard

Table 2 Groundwater Analytical Summary, Better Brite - Zinc Shop

315 6th Street, De Pere, WI BRRTS # 02-05-000031

Sample Location	Date	Detected Parameters (µg/L)																			
		Hexavalent Chromium	Chromium	Iron	Sulfate	Sulfide	Antimony	Arsenic	Cadmium	Cyanide	Nickel	Silver	Thallium	Cobalt	Vanadium	1,1-DCA	1,1-DCE	PCE	1,1,1-TCA	TCE	VC
NR140 Preventive Action Limit		10	10	150	125,000	NO PAL	1.2	1	0.5	40	20	10	0.4	8	6	85	0.7	0.5	40	0.5	0.02
NR140 Enforcement Standard		100	100	300	250,000	NO ES	6	10	5	200	100	50	2	40	30	850	7	5	200	5	0.2
MW-7	Aug-94	<10	6.6 BJ	NA	NA	NA															
	DUP.	<10	<2.8	NA	NA	NA															
	Oct-94	<10 J	36.4 J	NA	NA	NA															
	Apr-98	<10	<5	NA	NA	NA															
	DUP	<10	<5	NA	NA	NA															
	May-00	<4.2	3.9	NA	NA	NA															
	Nov-00	<4.2	1.1	NA	NA	NA															
	Jun-01	<4.2	2.7	NA	NA	NA															
	Nov-01	<4.2	9.7	NA	NA	NA															
	May-02	<4.2	3.2	NA	NA	NA															
	Nov-02	<4.2	1.9	NA	NA	NA															
	May-03	<4.2	0.91	NA	NA	NA															
	May-04	<2.5	0.88	NA	NA	NA															
	May-05	<5.0	*32*	NA	NA	NA															
	8/21/07	NA	4.4	NA	NA	NA															
	7/21/09	NA	9	NA	NA	NA															
	8/24/10	<3.9	3.7"J"	NA	NA	NA															
	6/28/11	<3.9	NA	NA	NA	NA															
MW-7A	Aug-94	<10	<2.8	NA	NA	NA															
	Oct-94	<10 J	<3.4 J	NA	NA	NA															
	Apr-98	<10	<5	NA	NA	NA															
	May-00	<4.2	4.7	NA	NA	NA															
	Nov-00	7.9	5	NA	NA	NA															
	Jun-01	<4.2	2.5	NA	NA	NA															
	Nov-01	<4.2	<.52	NA	NA	NA															
	May-02	<4.2	1.4	NA	NA	NA															
	Nov-02	<4.2	0.98	NA	NA	NA															
	May-03	<4.2	0.85	NA	NA	NA															
	May-04	3.9	2.2	NA	NA	NA															
	May-05	<5.0	*0.65*	NA	NA	NA															
	8/24/10	<3.9	1.6"J"	NA	NA	NA															
	6/28/11	<3.9	NA	NA	NA	NA															
MW-8	Oct-94	<10	<0.70	NA	NA	NA															
	Nov-94	<10	<2.5	NA	NA	NA															
	DUP.	<10	<2.5	NA	NA	NA															
	Apr-98	<10	<5	NA	NA	NA															
	May-00	<4.2	15	NA	NA	NA															
	Nov-00	13	13	NA	NA	NA															
	Jun-01	5.3	2	NA	NA	NA															
	Nov-01	<4.2	2.3	NA	NA	NA															
	DUP	<4.2	6.7	NA	NA	NA															
	May-02	<4.2	4	NA	NA	NA															
	Nov-02	<4.2	23	NA	NA	NA															
	May-03	<4.2	2.2	NA	NA	NA															
	May-04	<2.5	1.7	NA	NA	NA															
	May-05	<5.0	1.1	NA	NA	NA															
	8/21/07	NA	2.3	NA	NA	NA															
	8/24/10	<3.9	96	NA	NA	NA															
	6/28/11	<3.9	NA	NA	NA	NA															

NA - Compound not analyzed

Underlined - Concentration exceeds preventive action limit

Bolded - Concentration exceeds enforcement standard

Table 2 Groundwater Analytical Summary, Better Brite - Zinc Shop
315 6th Street, De Pere, WI BRRTS # 02-05-000031

Sample Location	Date	Detected Parameters (µg/L)																			
		Hexavalent Chromium	Chromium	Iron	Sulfate	Sulfide	Antimony	Arsenic	Cadmium	Cyanide	Nickel	Silver	Thallium	Cobalt	Vanadium	1,1-DCA	1,1-DCE	PCE	1,1,1-TCA	TCE	VC
NR140 Preventive Action Limit		10	10	150	125,000	NO PAL	1.2	1	0.5	40	20	10	0.4	8	6	85	0.7	0.5	40	0.5	0.02
NR140 Enforcement Standard		100	100	300	250,000	NO ES	6	10	5	200	100	50	2	40	30	850	7	5	200	5	0.2
MW-8A	Oct-94	<10	<0.70	NA	NA	NA															
	Nov-94	<10	<2.5	NA	NA	NA															
	Apr-98	<10	<5	NA	NA	NA															
	May-00	<4.2	16	NA	NA	NA															
	Nov-00	<4.2	34	NA	NA	NA															
	Jun-01	<4.2	3.7	NA	NA	NA															
	Nov-01	<4.2	14	NA	NA	NA															
	May-02	<4.2	2.5	NA	NA	NA															
	DUP	<4.2	11	NA	NA	NA															
	Nov-02	<4.2	20	NA	NA	NA															
	May-03	<4.2	13	NA	NA	NA															
	May-04	3.9	0.59	NA	NA	NA															
	May-05	<5.0	2.6	NA	NA	NA															
	8/21/07	NA	0.92	NA	NA	NA															
	8/24/10	<3.9	1.7"J"	NA	NA	NA															
	6/28/11	<3.9	NA	NA	NA	NA															
MW-9	Aug-94	**400**	**697**	NA	NA	NA															
	Oct-94	**470 J**	**442 J**	NA	NA	NA															
	Apr-98	**209**	<5	NA	NA	NA															
	Jul-98	60	75	NA	NA	NA															
	Nov-00	13	15	NA	NA	NA															
	DUP	19	51	NA	NA	NA															
	Jun-01	28	**180**	NA	NA	NA															
	Nov-01	35	76	NA	NA	NA															
	May-02	75	72	NA	NA	NA															
	Nov-02	67	80	NA	NA	NA															
	May-03	32	53	NA	NA	NA															
	May-04	54	63	NA	NA	NA															
	Dup	50	46	NA	NA	NA															
	May-05	28	41	NA	NA	NA															
	Oct-06	17	34	NA	NA	NA															
	8/21/07	NA	52	NA	NA	NA															
	7/21/09	NA	33.3	NA	NA	NA															
	8/24/10	*27*	30.3	NA	NA	NA															
	6/28/11	*14*	NA	NA	NA	NA															
	10/23/12	*18 J*	NA	NA	NA	NA															
	12/5/13	<3.4	NA	NA	NA	NA															
	10/16/14	<3.9	NA	NA	NA	NA															
	10/22/15	<3.9	NA	NA	NA	NA															
	9/19/16	<26	NA	NA	NA	NA															
	6/12/18	<130	NA	NA	NA	NA															
	5/14/19	<51	NA	NA	NA	NA															

NA - Compound not analyzed
Underlined - Concentration exceeds preventive action limit
Bolded - Concentration exceeds enforcement standard

Table 2 Groundwater Analytical Summary, Better Brite - Zinc Shop
315 6th Street, De Pere, WI BRRTS # 02-05-000031

Sample Location	Date	Detected Parameters (µg/L)																			
		Hexavalent Chromium	Chromium	Iron	Sulfate	Sulfide	Antimony	Arsenic	Cadmium	Cyanide	Nickel	Silver	Thallium	Cobalt	Vanadium	1,1-DCA	1,1-DCE	PCE	1,1,1-TCA	TCE	VC
NR140 Preventive Action Limit		10	10	150	125,000	NO PAL	1.2	1	0.5	40	20	10	0.4	8	6	85	0.7	0.5	40	0.5	0.02
NR140 Enforcement Standard		100	100	300	250,000	NO ES	6	10	5	200	100	50	2	40	30	850	7	5	200	5	0.2
MW-10	Aug-94	**60300**	**53100**	NA	NA	NA															
	Oct-94	**60800 J**	**43,500 J**	NA	NA	NA															
	Nov-00	**20000**	**18000**	NA	NA	NA															
	Jun-01	<4.2	20	NA	NA	NA															
	Nov-02	**35000**	**38000**	NA	NA	NA															
	May-03	**38000**	**37000**	NA	NA	NA															
	May-04	**25000**	**22000**	NA	NA	NA															
	Nov-05	**13000**	**13000**	NA	NA	NA															
	Oct-06	**14000**	**13000**	NA	NA	NA															
	8/21/07	NA	**17,000**	NA	NA	NA															
	10/22/15	**10,300**	NA	NA	NA	NA															
	9/19/16	**9,800**	NA	NA	NA	NA															
	6/12/18	**3,200**	NA	NA	NA	NA															
	5/14/19	**1,500**	NA	NA	NA	NA															
MW-11	May-95	<10	<1.0	NA	NA	NA															
	Apr-98	<10	<5	NA	NA	NA															
	May-00	<4.2	7.0	NA	NA	NA															
	Nov-00	<4.2	4.1	NA	NA	NA															
	Jun-01	<4.2	3.6	NA	NA	NA															
	Nov-01	<4.2	7.8	NA	NA	NA															
	May-02	17	<20	NA	NA	NA															
	Nov-02	<4.2	27	NA	NA	NA															
	May-03	<4.2	12	NA	NA	NA															
	May-04	<2.5	2.3	NA	NA	NA															
	May-05	<5.0	2.8	NA	NA	NA															
	8/24/10	<3.9	8.9	NA	NA	NA															
	6/28/11	<3.9	NA	NA	NA	NA															
MW-12	Mar-95	<10 J	<2.9	NA	NA	NA															
	May-95	<10	<1.0	NA	NA	NA															
	Apr-98	<10	<5	NA	NA	NA															
	May-00	<4.2	4.8	NA	NA	NA															
	Nov-00	<4.2	6	NA	NA	NA															
	jun-01	<4.2	6.4	NA	NA	NA															
	Nov-01	<4.2	<0.52	NA	NA	NA															
	May-02	<4.2	4.8	NA	NA	NA															
	Nov-02	<4.2	1.3	NA	NA	NA															
	May-03	<4.2	1.3	NA	NA	NA															
	May-04	<2.5	1.8	NA	NA	NA															
	May-05	<5.0	8.1	NA	NA	NA															
	8/24/10	<3.9	6.5	NA	NA	NA															
	6/28/11	<3.9	NA	NA	NA	NA															
MW-13	Mar-95	<10 J	<2.9	NA	NA	NA															
	May-95	<10	<1.0	NA	NA	NA															

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Bolded - Concentration exceeds enforcement standard

Table 2 Groundwater Analytical Summary, Better Brite - Zinc Shop
315 6th Street, De Pere, WI BRRTS # 02-05-000031

Sample Location	Date	Detected Parameters (µg/L)																			
		Hexavalent Chromium	Chromium	Iron	Sulfate	Sulfide	Antimony	Arsenic	Cadmium	Cyanide	Nickel	Silver	Thallium	Cobalt	Vanadium	1,1-DCA	1,1-DCE	PCE	1,1,1-TCA	TCE	VC
NR140 Preventive Action Limit		10	10	150	125,000	NO PAL	1.2	1	0.5	40	20	10	0.4	8	6	85	0.7	0.5	40	0.5	0.02
NR140 Enforcement Standard		100	100	300	250,000	NO ES	6	10	5	200	100	50	2	40	30	850	7	5	200	5	0.2
Zinc Sump	Aug-94	**89000**	**209000**	NA	NA	NA															
	Oct-94	**144900**	**277000**	NA	NA	NA															
	Apr-98	**66000**	**38300**	NA	NA	NA															
	Jul-98	**131000**	**131000**	NA	NA	NA															
	May-00	**1800**	**1700**	NA	NA	NA															
	Nov-00	**41000**	**27000**	NA	NA	NA															
	Jun-01	**40000**	**110000**	NA	NA	NA															
	Nov-01	**23000**	**56000**	NA	NA	NA															
	May-02	**43000**	**14000**	NA	NA	NA															
	Nov-03	**23000**	**30000**	NA	NA	NA															
	May-03	**8400**	**6800**	NA	NA	NA															
	May-04	**24000**	**6400**	NA	NA	NA															
	May-05	**15000**	**13000**	NA	NA	NA															
	Oct-06	**7500**	**5900**	NA	NA	NA															
	8/21/07	NA	**20,000**	NA	NA	NA															
	7/21/09	NA	**14,800**	NA	NA	NA															
	8/24/10	**12,100**	**11,300**	NA	NA	NA	**90.6**	NA	NA	40	NA	NA	<2.2	2.5 J	4.7 J	<0.75	<0.57	<0.45	1.5	<0.48	<0.18
	6/28/11	**4100**	NA	NA	NA	NA	**6.6**	NA	NA	**250**	NA	NA	<2.2	2.5 J	4.7 J	1.2	2.8	*0.84*	38.9	<0.48	<0.18
	10/24/11	**3,700**	NA	NA	NA	NA	**6.0 "J"**	NA	NA	**220**	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	10/23/12	**110**	NA	NA	NA	NA	NA	NA	NA	40	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	12/5/13	**5,100**	NA	NA	NA	NA	NA	NA	NA	**340**	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	10/16/14	**9,600**	NA	NA	NA	NA	NA	NA	NA	190	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	10/22/15	**10,200**	NA	NA	NA	NA	NA	NA	NA	**220**	NA	NA	NA	NA	NA	2.9	2.5	1.2	49.0	<0.33	<0.18
	9/19/16	**14,000**	NA	NA	NA	NA	**<7.3**	NA	NA	160	NA	NA	NA	NA	NA	1.4	1.2	0.79J	22.6	<0.33	<0.18
	6/13/18	**9900**	NA	NA	NA	NA	NA	NA	NA	51	NA	NA	NA	NA	NA	<0.24	<0.41	<0.50	2.1	<0.33	<0.18
	5/14/19	**8100**	NA	NA	NA	NA	NA	NA	NA	100	NA	NA	NA	NA	NA	0.68J	1.2	0.45J	14.1	<0.26	<0.17
Private	Aug-94	<10	<10	NA	NA	NA															
Municipal	Aug-94	<10	<10	NA	NA	NA															
	DUP.	<10	<10	NA	NA	NA															
	Oct-94	<10	<10	NA	NA	NA															
	DUP.	<10	<10	NA	NA	NA															
USGS	Oct-94	<10	0.75 B	NA	NA	NA															
USGS-A	Oct-94	<10	11.9	NA	NA	NA															

NA - Compound not analyzed
Underlined - Concentration exceeds preventive action limit
Bolded - Concentration exceeds enforcement standard


05/14/2019


SUMP
05/14/2019


05/14/2019


←MW-1A
MW-1 →
05/14/2019


←MW-1A
MW-1 →
05/14/2019


←MW-1A
MW-1 →
05/14/2019


MW-2
05/14/2019


MW-3R
05/14/2019


05/14/2019


MW-5A ↑
MW-5 ↓
05/14/2019


MW-5A ↑
MW-5 ↓
05/14/2019


← MW-6
MW-6A →
05/14/2019


← MW-6
MW-6A →
05/14/2019


← MW-6
MW-6A →
05/14/2019


MW-7A ↑
↓ MW-7
05/14/2019


MW-7A ↑
↓ MW-7
05/14/2019


MW-7A ↑


05/14/2019


← MW-8A
MW-8 →
05/14/2019


← MW-8A
MW-8 →
05/14/2019


MW-10
05/14/2019


MW-11
05/14/2019


MW-12
05/14/2019


MW-106A →
← MW-106
05/14/2019


MW-106A →
← MW-106
05/14/2019


HERZOG
05/14/2019


←MW-107
MW-107A →
05/14/2019


←MW-107
MW-107A →
05/14/2019


05/14/2019


←MW-108
MW-108A →


←MW-108
MW-108A →
05/14/2019


05/14/2019


←MW-110A
MW-110→
05/14/2019


←MW-110A
MW-110→
MONITORING WELL
05/14/2019


MW-111
05/15/2019


MW-112
05/14/2019


MW-115
05/14/2019


05/14/2019


←MW-115A
MW-115→
ELCO
05/14/2019


←MW-115A
MW-115→
MONITORING WELL
05/14/2019


MW-116
05/14/2019

Pace Analytical Services, LLC
1241 Bellevue Street - Suite 9
Green Bay, WI 54302
(920)469-2436

May 28, 2019

Brian Wayner
Omnni Associates, Inc.
One Systems Drive
Appleton, WI 549141654

RE: Project: N1969A07/010 BETTER BRITE
Pace Project No.: 40187578

Dear Brian Wayner:
Enclosed are the analytical results for sample(s) received by the laboratory on May 14, 2019. The results relate only to the samples included in this report. Results reported herein conform to the most current, applicable TNI/NELAC standards and the laboratory's Quality Assurance Manual, where applicable, unless otherwise noted in the body of the report.

If you have any questions concerning this report, please feel free to contact me.

Sincerely,

Steven Mleczko
steve.mleczko@pacelabs.com
(920)469-2436
Project Manager

Enclosures

cc: Chris Rogers, OMNNI ASSOCIATES, INC.

Pace Analytical Services, LLC
1241 Bellevue Street - Suite 9
Green Bay, WI 54302
(920)469-2436

CERTIFICATIONS

Project: N1969A07/010 BETTER BRITE
Pace Project No.: 40187578

Green Bay Certification IDs

1241 Bellevue Street, Green Bay, WI 54302
Florida/NELAP Certification #: E87948
Illinois Certification #: 200050
Kentucky UST Certification #: 82
Louisiana Certification #: 04168
Minnesota Certification #: 055-999-334
New York Certification #: 12064
North Dakota Certification #: R-150
Virginia VELAP ID: 460263
South Carolina Certification #: 83006001
Texas Certification #: T104704529-14-1
Wisconsin Certification #: 405132750
Wisconsin DATCP Certification #: 105-444
USDA Soil Permit #: P330-16-00157
Federal Fish & Wildlife Permit #: LE51774A-0

Indiana Certification IDs

7726 Moller Road, Indianapolis, IN 46268
Illinois Certification #: 200074
Indiana Certification #: C-49-06
Kansas/NELAP Certification #: E-10177
Kentucky UST Certification #: 80226
Kentucky WW Certification #: 98019
Michigan Department of Environmental Quality, Laboratory #9050
Ohio VAP Certification #: CL0065
Oklahoma Certification #: 2018-101
Texas Certification #: T104704355
West Virginia Certification #: 330
Wisconsin Certification #: 999788130
USDA Soil Permit #: P330-16-00257

Pace Analytical Services, LLC
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SAMPLE SUMMARY

Project: N1969A07/010 BETTER BRITE
Pace Project No.: 40187578

Lab ID	Sample ID	Matrix	Date Collected	Date Received
40187578001	**TRIP BLANK**	Water	05/14/19 09:15	05/14/19 15:39
40187578002	**W-1**	Water	05/14/19 12:11	05/14/19 15:39
40187578003	**W-1A**	Water	05/14/19 11:58	05/14/19 15:39
40187578004	**MW-3R**	Water	05/14/19 12:41	05/14/19 15:39
40187578005	**MW-5**	Water	05/14/19 13:43	05/14/19 15:39
40187578006	**MW-6**	Water	05/14/19 11:27	05/14/19 15:39
40187578007	**MW-9**	Water	05/14/19 09:56	05/14/19 15:39
40187578008	**MW-10**	Water	05/14/19 10:45	05/14/19 15:39
40187578009	**ZINC SUMP**	Water	05/14/19 13:08	05/14/19 15:39

Pace Analytical Services, LLC
1241 Bellevue Street - Suite 9
Green Bay, WI 54302
(920)469-2436

SAMPLE ANALYTE COUNT

Project: N1969A07/010 BETTER BRITE
Pace Project No.: 40187578

Lab ID	Sample ID	Method	Analysts	Analytes Reported	Laboratory
40187578001	**TRIP BLANK**	EPA 8260	LAP	64	PASI-G
40187578002	**W-1**	SM 3500-Cr B (Online)	DEY	1	PASI-G
40187578003	**W-1A**	SM 3500-Cr B (Online)	DEY	1	PASI-G
40187578004	**MW-3R**	SM 3500-Cr B (Online)	DEY	1	PASI-G
40187578005	**MW-5**	SM 3500-Cr B (Online)	DEY	1	PASI-G
40187578006	**MW-6**	SM 3500-Cr B (Online)	DEY	1	PASI-G
40187578007	**MW-9**	SM 3500-Cr B (Online)	DEY	1	PASI-G
40187578008	**MW-10**	SM 3500-Cr B (Online)	DEY	1	PASI-G
40187578009	**ZINC SUMP**	EPA 8260	LAP	64	PASI-G
		SM 3500-Cr B (Online)	DEY	1	PASI-G
		EPA 335.4	GWA	1	PASI-I

REPORT OF LABORATORY ANALYSIS

Pace Analytical Services, LLC
1241 Bellevue Street - Suite 9
Green Bay, WI 54302
(920)469-2436

ANALYTICAL RESULTS

Project: N1969A07/010 BETTER BRITE
Pace Project No.: 40187578

Sample: TRIP BLANK **Lab ID: 40187578001** Collected: 05/14/19 09:15 Received: 05/14/19 15:39 Matrix: Water

Parameters	Results	Units	LOQ	LOD	DF	Prepared	Analyzed	CAS No.	Qual
8260 MSV	Analytical Method: EPA 8260								
Benzene	**<0.25**	ug/L	1.0	0.25	1		05/16/19 12:37	71-43-2	
Bromobenzene	**<0.24**	ug/L	1.0	0.24	1		05/16/19 12:37	108-86-1	
Bromochloromethane	**<0.36**	ug/L	5.0	0.36	1		05/16/19 12:37	74-97-5	
Bromodichloromethane	**<0.36**	ug/L	1.2	0.36	1		05/16/19 12:37	75-27-4	
Bromoform	**<4.0**	ug/L	13.2	4.0	1		05/16/19 12:37	75-25-2	
Bromomethane	**<0.97**	ug/L	5.0	0.97	1		05/16/19 12:37	74-83-9	
n-Butylbenzene	**<0.71**	ug/L	2.4	0.71	1		05/16/19 12:37	104-51-8	
sec-Butylbenzene	**<0.85**	ug/L	5.0	0.85	1		05/16/19 12:37	135-98-8	
tert-Butylbenzene	**<0.30**	ug/L	1.0	0.30	1		05/16/19 12:37	98-06-6	
Carbon tetrachloride	**<0.17**	ug/L	1.0	0.17	1		05/16/19 12:37	56-23-5	
Chlorobenzene	**<0.71**	ug/L	2.4	0.71	1		05/16/19 12:37	108-90-7	
Chloroethane	**<1.3**	ug/L	5.0	1.3	1		05/16/19 12:37	75-00-3	
Chloroform	**<1.3**	ug/L	5.0	1.3	1		05/16/19 12:37	67-66-3	
Chloromethane	**<2.2**	ug/L	7.3	2.2	1		05/16/19 12:37	74-87-3	
2-Chlorotoluene	**<0.93**	ug/L	5.0	0.93	1		05/16/19 12:37	95-49-8	
4-Chlorotoluene	**<0.76**	ug/L	2.5	0.76	1		05/16/19 12:37	106-43-4	
1,2-Dibromo-3-chloropropane	**<1.8**	ug/L	5.9	1.8	1		05/16/19 12:37	96-12-8	
Dibromochloromethane	**<2.6**	ug/L	8.7	2.6	1		05/16/19 12:37	124-48-1	
1,2-Dibromoethane (EDB)	**<0.83**	ug/L	2.8	0.83	1		05/16/19 12:37	106-93-4	
Dibromomethane	**<0.94**	ug/L	3.1	0.94	1		05/16/19 12:37	74-95-3	
1,2-Dichlorobenzene	**<0.71**	ug/L	2.4	0.71	1		05/16/19 12:37	95-50-1	
1,3-Dichlorobenzene	**<0.63**	ug/L	2.1	0.63	1		05/16/19 12:37	541-73-1	
1,4-Dichlorobenzene	**<0.94**	ug/L	3.1	0.94	1		05/16/19 12:37	106-46-7	
Dichlorodifluoromethane	**<0.50**	ug/L	5.0	0.50	1		05/16/19 12:37	75-71-8	
1,1-Dichloroethane	**<0.27**	ug/L	1.0	0.27	1		05/16/19 12:37	75-34-3	
1,2-Dichloroethane	**<0.28**	ug/L	1.0	0.28	1		05/16/19 12:37	107-06-2	
1,1-Dichloroethene	**<0.24**	ug/L	1.0	0.24	1		05/16/19 12:37	75-35-4	
cis-1,2-Dichloroethene	**<0.27**	ug/L	1.0	0.27	1		05/16/19 12:37	156-59-2	
trans-1,2-Dichloroethene	**<1.1**	ug/L	3.6	1.1	1		05/16/19 12:37	156-60-5	
1,2-Dichloropropane	**<0.28**	ug/L	1.0	0.28	1		05/16/19 12:37	78-87-5	
1,3-Dichloropropane	**<0.83**	ug/L	2.8	0.83	1		05/16/19 12:37	142-28-9	
2,2-Dichloropropane	**<2.3**	ug/L	7.6	2.3	1		05/16/19 12:37	594-20-7	
1,1-Dichloropropene	**<0.54**	ug/L	1.8	0.54	1		05/16/19 12:37	563-58-6	
cis-1,3-Dichloropropene	**<3.6**	ug/L	12.1	3.6	1		05/16/19 12:37	10061-01-5	
trans-1,3-Dichloropropene	**<4.4**	ug/L	14.6	4.4	1		05/16/19 12:37	10061-02-6	
Diisopropyl ether	**<1.9**	ug/L	6.3	1.9	1		05/16/19 12:37	108-20-3	
Ethylbenzene	**<0.22**	ug/L	1.0	0.22	1		05/16/19 12:37	100-41-4	
Hexachloro-1,3-butadiene	**<1.2**	ug/L	5.0	1.2	1		05/16/19 12:37	87-68-3	
Isopropylbenzene (Cumene)	**<0.39**	ug/L	5.0	0.39	1		05/16/19 12:37	98-82-8	
p-Isopropyltoluene	**<0.80**	ug/L	2.7	0.80	1		05/16/19 12:37	99-87-6	
Methylene Chloride	**<0.58**	ug/L	5.0	0.58	1		05/16/19 12:37	75-09-2	
Methyl-tert-butyl ether	**<1.2**	ug/L	4.2	1.2	1		05/16/19 12:37	1634-04-4	
Naphthalene	**<1.2**	ug/L	5.0	1.2	1		05/16/19 12:37	91-20-3	
n-Propylbenzene	**<0.81**	ug/L	5.0	0.81	1		05/16/19 12:37	103-65-1	
Styrene	**<0.47**	ug/L	1.6	0.47	1		05/16/19 12:37	100-42-5	
1,1,1,2-Tetrachloroethane	**<0.27**	ug/L	1.0	0.27	1		05/16/19 12:37	630-20-6	

REPORT OF LABORATORY ANALYSIS

Pace Analytical Services, LLC
1241 Bellevue Street - Suite 9
Green Bay, WI 54302
(920)469-2436

ANALYTICAL RESULTS

Project: N1969A07/010 BETTER BRITE
Pace Project No.: 40187578

Sample: TRIP BLANK **Lab ID: 40187578001** Collected: 05/14/19 09:15 Received: 05/14/19 15:39 Matrix: Water

Parameters	Results	Units	LOQ	LOD	DF	Prepared	Analyzed	CAS No.	Qual
8260 MSV	Analytical Method: EPA 8260								
1,1,2,2-Tetrachloroethane	**<0.28**	ug/L	1.0	0.28	1		05/16/19 12:37	79-34-5	
Tetrachloroethene	**<0.33**	ug/L	1.1	0.33	1		05/16/19 12:37	127-18-4	
Toluene	**<0.17**	ug/L	5.0	0.17	1		05/16/19 12:37	108-88-3	
1,2,3-Trichlorobenzene	**<0.63**	ug/L	5.0	0.63	1		05/16/19 12:37	87-61-6	
1,2,4-Trichlorobenzene	**<0.95**	ug/L	5.0	0.95	1		05/16/19 12:37	120-82-1	
1,1,1-Trichloroethane	**<0.24**	ug/L	1.0	0.24	1		05/16/19 12:37	71-55-6	
1,1,2-Trichloroethane	**<0.55**	ug/L	5.0	0.55	1		05/16/19 12:37	79-00-5	
Trichloroethene	**<0.26**	ug/L	1.0	0.26	1		05/16/19 12:37	79-01-6	
Trichlorofluoromethane	**<0.21**	ug/L	1.0	0.21	1		05/16/19 12:37	75-69-4	
1,2,3-Trichloropropane	**<0.59**	ug/L	5.0	0.59	1		05/16/19 12:37	96-18-4	
1,2,4-Trimethylbenzene	**<0.84**	ug/L	2.8	0.84	1		05/16/19 12:37	95-63-6	
1,3,5-Trimethylbenzene	**<0.87**	ug/L	2.9	0.87	1		05/16/19 12:37	108-67-8	
Vinyl chloride	**<0.17**	ug/L	1.0	0.17	1		05/16/19 12:37	75-01-4	
m&p-Xylene	**<0.47**	ug/L	2.0	0.47	1		05/16/19 12:37	179601-23-1	
o-Xylene	**<0.26**	ug/L	1.0	0.26	1		05/16/19 12:37	95-47-6	
Surrogates									
4-Bromofluorobenzene (S)	87	%	70-130		1		05/16/19 12:37	460-00-4	
Dibromofluoromethane (S)	104	%	70-130		1		05/16/19 12:37	1868-53-7	
Toluene-d8 (S)	95	%	70-130		1		05/16/19 12:37	2037-26-5	

Sample: W-1 **Lab ID: 40187578002** Collected: 05/14/19 12:11 Received: 05/14/19 15:39 Matrix: Water

Parameters	Results	Units	LOQ	LOD	DF	Prepared	Analyzed	CAS No.	Qual
Chromium, Hexavalent	Analytical Method: SM 3500-Cr B (Online)								
Chromium, Hexavalent	**4.4**	mg/L	0.43	0.13	25		05/15/19 09:15		

Sample: W-1A **Lab ID: 40187578003** Collected: 05/14/19 11:58 Received: 05/14/19 15:39 Matrix: Water

Parameters	Results	Units	LOQ	LOD	DF	Prepared	Analyzed	CAS No.	Qual
Chromium, Hexavalent	Analytical Method: SM 3500-Cr B (Online)								
Chromium, Hexavalent	**1.8**	mg/L	0.17	0.051	10		05/15/19 09:15		

Sample: MW-3R **Lab ID: 40187578004** Collected: 05/14/19 12:41 Received: 05/14/19 15:39 Matrix: Water

Parameters	Results	Units	LOQ	LOD	DF	Prepared	Analyzed	CAS No.	Qual
Chromium, Hexavalent	Analytical Method: SM 3500-Cr B (Online)								
Chromium, Hexavalent	**0.088**	mg/L	0.043	0.013	2.5		05/15/19 09:15		

REPORT OF LABORATORY ANALYSIS

Pace Analytical Services, LLC
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Green Bay, WI 54302
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ANALYTICAL RESULTS

Project: N1969A07/010 BETTER BRITE
Pace Project No.: 40187578

Sample: MW-5 **Lab ID: 40187578005** Collected: 05/14/19 13:43 Received: 05/14/19 15:39 Matrix: Water

Parameters	Results	Units	LOQ	LOD	DF	Prepared	Analyzed	CAS No.	Qual
Chromium, Hexavalent	Analytical Method: SM 3500-Cr B (Online)								
Chromium, Hexavalent	**<0.051**	mg/L	0.17	0.051	10		05/15/19 09:15		D3

Sample: MW-6 **Lab ID: 40187578006** Collected: 05/14/19 11:27 Received: 05/14/19 15:39 Matrix: Water

Parameters	Results	Units	LOQ	LOD	DF	Prepared	Analyzed	CAS No.	Qual
Chromium, Hexavalent	Analytical Method: SM 3500-Cr B (Online)								
Chromium, Hexavalent	**1.2**	mg/L	0.17	0.051	10		05/15/19 09:15		

Sample: MW-9 **Lab ID: 40187578007** Collected: 05/14/19 09:56 Received: 05/14/19 15:39 Matrix: Water

Parameters	Results	Units	LOQ	LOD	DF	Prepared	Analyzed	CAS No.	Qual
Chromium, Hexavalent	Analytical Method: SM 3500-Cr B (Online)								
Chromium, Hexavalent	**<0.051**	mg/L	0.17	0.051	10		05/15/19 09:15		D3

Sample: MW-10 **Lab ID: 40187578008** Collected: 05/14/19 10:45 Received: 05/14/19 15:39 Matrix: Water

Parameters	Results	Units	LOQ	LOD	DF	Prepared	Analyzed	CAS No.	Qual
Chromium, Hexavalent	Analytical Method: SM 3500-Cr B (Online)								
Chromium, Hexavalent	**1.5**	mg/L	0.43	0.13	25		05/15/19 09:15		

Sample: ZINC SUMP **Lab ID: 40187578009** Collected: 05/14/19 13:08 Received: 05/14/19 15:39 Matrix: Water

Parameters	Results	Units	LOQ	LOD	DF	Prepared	Analyzed	CAS No.	Qual
8260 MSV	Analytical Method: EPA 8260								
Benzene	**<0.25**	ug/L	1.0	0.25	1		05/16/19 12:59	71-43-2	
Bromobenzene	**<0.24**	ug/L	1.0	0.24	1		05/16/19 12:59	108-86-1	
Bromochloromethane	**<0.36**	ug/L	5.0	0.36	1		05/16/19 12:59	74-97-5	
Bromodichloromethane	**<0.36**	ug/L	1.2	0.36	1		05/16/19 12:59	75-27-4	
Bromoform	**<4.0**	ug/L	13.2	4.0	1		05/16/19 12:59	75-25-2	
Bromomethane	**<0.97**	ug/L	5.0	0.97	1		05/16/19 12:59	74-83-9	R1
n-Butylbenzene	**<0.71**	ug/L	2.4	0.71	1		05/16/19 12:59	104-51-8	
sec-Butylbenzene	**<0.85**	ug/L	5.0	0.85	1		05/16/19 12:59	135-98-8	
tert-Butylbenzene	**<0.30**	ug/L	1.0	0.30	1		05/16/19 12:59	98-06-6	
Carbon tetrachloride	**<0.17**	ug/L	1.0	0.17	1		05/16/19 12:59	56-23-5	
Chlorobenzene	**<0.71**	ug/L	2.4	0.71	1		05/16/19 12:59	108-90-7	

REPORT OF LABORATORY ANALYSIS

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ANALYTICAL RESULTS

Project: N1969A07/010 BETTER BRITE
Pace Project No.: 40187578

Sample: ZINC SUMP **Lab ID: 40187578009** Collected: 05/14/19 13:08 Received: 05/14/19 15:39 Matrix: Water

Parameters	Results	Units	LOQ	LOD	DF	Prepared	Analyzed	CAS No.	Qual
8260 MSV	Analytical Method: EPA 8260								
Chloroethane	**<1.3**	ug/L	5.0	1.3	1		05/16/19 12:59	75-00-3	R1
Chloroform	**<1.3**	ug/L	5.0	1.3	1		05/16/19 12:59	67-66-3	
Chloromethane	**<2.2**	ug/L	7.3	2.2	1		05/16/19 12:59	74-87-3	R1
2-Chlorotoluene	**<0.93**	ug/L	5.0	0.93	1		05/16/19 12:59	95-49-8	
4-Chlorotoluene	**<0.76**	ug/L	2.5	0.76	1		05/16/19 12:59	106-43-4	
1,2-Dibromo-3-chloropropane	**<1.8**	ug/L	5.9	1.8	1		05/16/19 12:59	96-12-8	
Dibromochloromethane	**<2.6**	ug/L	8.7	2.6	1		05/16/19 12:59	124-48-1	
1,2-Dibromoethane (EDB)	**<0.83**	ug/L	2.8	0.83	1		05/16/19 12:59	106-93-4	
Dibromomethane	**<0.94**	ug/L	3.1	0.94	1		05/16/19 12:59	74-95-3	
1,2-Dichlorobenzene	**<0.71**	ug/L	2.4	0.71	1		05/16/19 12:59	95-50-1	
1,3-Dichlorobenzene	**<0.63**	ug/L	2.1	0.63	1		05/16/19 12:59	541-73-1	
1,4-Dichlorobenzene	**<0.94**	ug/L	3.1	0.94	1		05/16/19 12:59	106-46-7	
Dichlorodifluoromethane	**<0.50**	ug/L	5.0	0.50	1		05/16/19 12:59	75-71-8	R1
1,1-Dichloroethane	**0.68J**	ug/L	1.0	0.27	1		05/16/19 12:59	75-34-3	
1,2-Dichloroethane	**<0.28**	ug/L	1.0	0.28	1		05/16/19 12:59	107-06-2	M1
1,1-Dichloroethene	**1.2**	ug/L	1.0	0.24	1		05/16/19 12:59	75-35-4	R1
cis-1,2-Dichloroethene	**<0.27**	ug/L	1.0	0.27	1		05/16/19 12:59	156-59-2	
trans-1,2-Dichloroethene	**<1.1**	ug/L	3.6	1.1	1		05/16/19 12:59	156-60-5	
1,2-Dichloropropane	**<0.28**	ug/L	1.0	0.28	1		05/16/19 12:59	78-87-5	
1,3-Dichloropropane	**<0.83**	ug/L	2.8	0.83	1		05/16/19 12:59	142-28-9	
2,2-Dichloropropane	**<2.3**	ug/L	7.6	2.3	1		05/16/19 12:59	594-20-7	
1,1-Dichloropropene	**<0.54**	ug/L	1.8	0.54	1		05/16/19 12:59	563-58-6	
cis-1,3-Dichloropropene	**<3.6**	ug/L	12.1	3.6	1		05/16/19 12:59	10061-01-5	
trans-1,3-Dichloropropene	**<4.4**	ug/L	14.6	4.4	1		05/16/19 12:59	10061-02-6	
Diisopropyl ether	**<1.9**	ug/L	6.3	1.9	1		05/16/19 12:59	108-20-3	M1
Ethylbenzene	**<0.22**	ug/L	1.0	0.22	1		05/16/19 12:59	100-41-4	
Hexachloro-1,3-butadiene	**<1.2**	ug/L	5.0	1.2	1		05/16/19 12:59	87-68-3	
Isopropylbenzene (Cumene)	**<0.39**	ug/L	5.0	0.39	1		05/16/19 12:59	98-82-8	
p-Isopropyltoluene	**<0.80**	ug/L	2.7	0.80	1		05/16/19 12:59	99-87-6	
Methylene Chloride	**<0.58**	ug/L	5.0	0.58	1		05/16/19 12:59	75-09-2	
Methyl-tert-butyl ether	**<1.2**	ug/L	4.2	1.2	1		05/16/19 12:59	1634-04-4	
Naphthalene	**<1.2**	ug/L	5.0	1.2	1		05/16/19 12:59	91-20-3	
n-Propylbenzene	**<0.81**	ug/L	5.0	0.81	1		05/16/19 12:59	103-65-1	
Styrene	**<0.47**	ug/L	1.6	0.47	1		05/16/19 12:59	100-42-5	
1,1,1,2-Tetrachloroethane	**<0.27**	ug/L	1.0	0.27	1		05/16/19 12:59	630-20-6	
1,1,2,2-Tetrachloroethane	**<0.28**	ug/L	1.0	0.28	1		05/16/19 12:59	79-34-5	
Tetrachloroethene	**0.45J**	ug/L	1.1	0.33	1		05/16/19 12:59	127-18-4	
Toluene	**<0.17**	ug/L	5.0	0.17	1		05/16/19 12:59	108-88-3	
1,2,3-Trichlorobenzene	**<0.63**	ug/L	5.0	0.63	1		05/16/19 12:59	87-61-6	
1,2,4-Trichlorobenzene	**<0.95**	ug/L	5.0	0.95	1		05/16/19 12:59	120-82-1	
1,1,1-Trichloroethane	**14.1**	ug/L	1.0	0.24	1		05/16/19 12:59	71-55-6	
1,1,2-Trichloroethane	**<0.55**	ug/L	5.0	0.55	1		05/16/19 12:59	79-00-5	
Trichloroethene	**<0.26**	ug/L	1.0	0.26	1		05/16/19 12:59	79-01-6	
Trichlorofluoromethane	**<0.21**	ug/L	1.0	0.21	1		05/16/19 12:59	75-69-4	R1
1,2,3-Trichloropropane	**<0.59**	ug/L	5.0	0.59	1		05/16/19 12:59	96-18-4	
1,2,4-Trimethylbenzene	**<0.84**	ug/L	2.8	0.84	1		05/16/19 12:59	95-63-6	

REPORT OF LABORATORY ANALYSIS

Pace Analytical Services, LLC
1241 Bellevue Street - Suite 9
Green Bay, WI 54302
(920)469-2436

ANALYTICAL RESULTS

Project: N1969A07/010 BETTER BRITE
Pace Project No.: 40187578

Sample: ZINC SUMP **Lab ID: 40187578009** Collected: 05/14/19 13:08 Received: 05/14/19 15:39 Matrix: Water

Parameters	Results	Units	LOQ	LOD	DF	Prepared	Analyzed	CAS No.	Qual
8260 MSV	Analytical Method: EPA 8260								
1,3,5-Trimethylbenzene	**<0.87**	ug/L	2.9	0.87	1		05/16/19 12:59	108-67-8	
Vinyl chloride	**<0.17**	ug/L	1.0	0.17	1		05/16/19 12:59	75-01-4	R1
m&p-Xylene	**<0.47**	ug/L	2.0	0.47	1		05/16/19 12:59	179601-23-1	
o-Xylene	**<0.26**	ug/L	1.0	0.26	1		05/16/19 12:59	95-47-6	
Surrogates									
4-Bromofluorobenzene (S)	85	%	70-130		1		05/16/19 12:59	460-00-4	
Dibromofluoromethane (S)	103	%	70-130		1		05/16/19 12:59	1868-53-7	
Toluene-d8 (S)	96	%	70-130		1		05/16/19 12:59	2037-26-5	
Chromium, Hexavalent	Analytical Method: SM 3500-Cr B (Online)								
Chromium, Hexavalent	**8.1**	mg/L	0.86	0.26	50		05/15/19 09:15		
335.4 Cyanide, Total	Analytical Method: EPA 335.4 Preparation Method: EPA 335.4								
Cyanide	**0.10**	mg/L	0.012	0.0037	1	05/23/19 08:16	05/23/19 16:40	57-12-5	

REPORT OF LABORATORY ANALYSIS

Pace Analytical Services, LLC
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QUALITY CONTROL DATA

Project: N1969A07/010 BETTER BRITE
Pace Project No.: 40187578

QC Batch: 321411 Analysis Method: EPA 8260
QC Batch Method: EPA 8260 Analysis Description: 8260 MSV
Associated Lab Samples: 40187578001, 40187578009

METHOD BLANK: 1866651 Matrix: Water
Associated Lab Samples: 40187578001, 40187578009

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
1,1,1,2-Tetrachloroethane	ug/L	<0.27	1.0	05/16/19 10:23	
1,1,1-Trichloroethane	ug/L	<0.24	1.0	05/16/19 10:23	
1,1,2,2-Tetrachloroethane	ug/L	<0.28	1.0	05/16/19 10:23	
1,1,2-Trichloroethane	ug/L	<0.55	5.0	05/16/19 10:23	
1,1-Dichloroethane	ug/L	<0.27	1.0	05/16/19 10:23	
1,1-Dichloroethene	ug/L	<0.24	1.0	05/16/19 10:23	
1,1-Dichloropropene	ug/L	<0.54	1.8	05/16/19 10:23	
1,2,3-Trichlorobenzene	ug/L	<0.63	5.0	05/16/19 10:23	
1,2,3-Trichloropropane	ug/L	<0.59	5.0	05/16/19 10:23	
1,2,4-Trichlorobenzene	ug/L	<0.95	5.0	05/16/19 10:23	
1,2,4-Trimethylbenzene	ug/L	<0.84	2.8	05/16/19 10:23	
1,2-Dibromo-3-chloropropane	ug/L	<1.8	5.9	05/16/19 10:23	
1,2-Dibromoethane (EDB)	ug/L	<0.83	2.8	05/16/19 10:23	
1,2-Dichlorobenzene	ug/L	<0.71	2.4	05/16/19 10:23	
1,2-Dichloroethane	ug/L	<0.28	1.0	05/16/19 10:23	
1,2-Dichloropropane	ug/L	<0.28	1.0	05/16/19 10:23	
1,3,5-Trimethylbenzene	ug/L	<0.87	2.9	05/16/19 10:23	
1,3-Dichlorobenzene	ug/L	<0.63	2.1	05/16/19 10:23	
1,3-Dichloropropane	ug/L	<0.83	2.8	05/16/19 10:23	
1,4-Dichlorobenzene	ug/L	<0.94	3.1	05/16/19 10:23	
2,2-Dichloropropane	ug/L	<2.3	7.6	05/16/19 10:23	
2-Chlorotoluene	ug/L	<0.93	5.0	05/16/19 10:23	
4-Chlorotoluene	ug/L	<0.76	2.5	05/16/19 10:23	
Benzene	ug/L	<0.25	1.0	05/16/19 10:23	
Bromobenzene	ug/L	<0.24	1.0	05/16/19 10:23	
Bromochloromethane	ug/L	<0.36	5.0	05/16/19 10:23	
Bromodichloromethane	ug/L	<0.36	1.2	05/16/19 10:23	
Bromoform	ug/L	<4.0	13.2	05/16/19 10:23	
Bromomethane	ug/L	<0.97	5.0	05/16/19 10:23	
Carbon tetrachloride	ug/L	<0.17	1.0	05/16/19 10:23	
Chlorobenzene	ug/L	<0.71	2.4	05/16/19 10:23	
Chloroethane	ug/L	<1.3	5.0	05/16/19 10:23	
Chloroform	ug/L	<1.3	5.0	05/16/19 10:23	
Chloromethane	ug/L	<2.2	7.3	05/16/19 10:23	
cis-1,2-Dichloroethene	ug/L	<0.27	1.0	05/16/19 10:23	
cis-1,3-Dichloropropene	ug/L	<3.6	12.1	05/16/19 10:23	
Dibromochloromethane	ug/L	<2.6	8.7	05/16/19 10:23	
Dibromomethane	ug/L	<0.94	3.1	05/16/19 10:23	
Dichlorodifluoromethane	ug/L	<0.50	5.0	05/16/19 10:23	
Diisopropyl ether	ug/L	<1.9	6.3	05/16/19 10:23	
Ethylbenzene	ug/L	<0.22	1.0	05/16/19 10:23	

Results presented on this page are in the units indicated by the "Units" column except where an alternate unit is presented to the right of the result.

REPORT OF LABORATORY ANALYSIS

Pace Analytical Services, LLC
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QUALITY CONTROL DATA

Project: N1969A07/010 BETTER BRITE
Pace Project No.: 40187578

METHOD BLANK: 1866651 Matrix: Water
Associated Lab Samples: 40187578001, 40187578009

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Hexachloro-1,3-butadiene	ug/L	<1.2	5.0	05/16/19 10:23	
Isopropylbenzene (Cumene)	ug/L	<0.39	5.0	05/16/19 10:23	
m&p-Xylene	ug/L	<0.47	2.0	05/16/19 10:23	
Methyl-tert-butyl ether	ug/L	<1.2	4.2	05/16/19 10:23	
Methylene Chloride	ug/L	<0.58	5.0	05/16/19 10:23	
n-Butylbenzene	ug/L	<0.71	2.4	05/16/19 10:23	
n-Propylbenzene	ug/L	<0.81	5.0	05/16/19 10:23	
Naphthalene	ug/L	<1.2	5.0	05/16/19 10:23	
o-Xylene	ug/L	<0.26	1.0	05/16/19 10:23	
p-Isopropyltoluene	ug/L	<0.80	2.7	05/16/19 10:23	
sec-Butylbenzene	ug/L	<0.85	5.0	05/16/19 10:23	
Styrene	ug/L	<0.47	1.6	05/16/19 10:23	
tert-Butylbenzene	ug/L	<0.30	1.0	05/16/19 10:23	
Tetrachloroethene	ug/L	<0.33	1.1	05/16/19 10:23	
Toluene	ug/L	<0.17	5.0	05/16/19 10:23	
trans-1,2-Dichloroethene	ug/L	<1.1	3.6	05/16/19 10:23	
trans-1,3-Dichloropropene	ug/L	<4.4	14.6	05/16/19 10:23	
Trichloroethene	ug/L	<0.26	1.0	05/16/19 10:23	
Trichlorofluoromethane	ug/L	<0.21	1.0	05/16/19 10:23	
Vinyl chloride	ug/L	<0.17	1.0	05/16/19 10:23	
4-Bromofluorobenzene (S)	%	93	70-130	05/16/19 10:23	
Dibromofluoromethane (S)	%	103	70-130	05/16/19 10:23	
Toluene-d8 (S)	%	93	70-130	05/16/19 10:23	

LABORATORY CONTROL SAMPLE: 1866652

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
1,1,1,2-Tetrachloroethane	ug/L	50	49.8	100	70-130	
1,1,1-Trichloroethane	ug/L	50	49.0	98	70-130	
1,1,2,2-Tetrachloroethane	ug/L	50	37.6	75	70-130	
1,1,2-Trichloroethane	ug/L	50	39.7	79	70-130	
1,1-Dichloroethane	ug/L	50	41.8	84	73-150	
1,1-Dichloroethene	ug/L	50	61.6	123	73-138	
1,1-Dichloropropene	ug/L	50	46.4	93	70-130	
1,2,3-Trichlorobenzene	ug/L	50	41.6	83	70-130	
1,2,3-Trichloropropane	ug/L	50	36.2	72	70-130	
1,2,4-Trichlorobenzene	ug/L	50	44.2	88	70-130	
1,2,4-Trimethylbenzene	ug/L	50	46.9	94	70-130	
1,2-Dibromo-3-chloropropane	ug/L	50	34.6	69	64-129	
1,2-Dibromoethane (EDB)	ug/L	50	40.5	81	70-130	
1,2-Dichlorobenzene	ug/L	50	46.3	93	70-130	
1,2-Dichloroethane	ug/L	50	37.7	75	75-140	
1,2-Dichloropropane	ug/L	50	44.6	89	73-135	
1,3,5-Trimethylbenzene	ug/L	50	47.9	96	70-130	

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REPORT OF LABORATORY ANALYSIS

Pace Analytical Services, LLC
1241 Bellevue Street - Suite 9
Green Bay, WI 54302
(920)469-2436

QUALITY CONTROL DATA

Project: N1969A07/010 BETTER BRITE
Pace Project No.: 40187578

LABORATORY CONTROL SAMPLE: 1866652

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
1,3-Dichlorobenzene	ug/L	50	48.4	97	70-130	
1,3-Dichloropropane	ug/L	50	39.8	80	70-130	
1,4-Dichlorobenzene	ug/L	50	45.5	91	70-130	
2,2-Dichloropropane	ug/L	50	53.5	107	70-130	
2-Chlorotoluene	ug/L	50	45.9	92	70-130	
4-Chlorotoluene	ug/L	50	47.5	95	70-130	
Benzene	ug/L	50	40.2	80	70-130	
Bromobenzene	ug/L	50	45.7	91	70-130	
Bromochloromethane	ug/L	50	44.7	89	70-130	
Bromodichloromethane	ug/L	50	44.2	88	70-130	
Bromoform	ug/L	50	44.2	88	68-129	
Bromomethane	ug/L	50	62.8	126	18-159	
Carbon tetrachloride	ug/L	50	48.3	97	70-130	
Chlorobenzene	ug/L	50	47.6	95	70-130	
Chloroethane	ug/L	50	47.2	94	53-147	
Chloroform	ug/L	50	45.3	91	74-136	
Chloromethane	ug/L	50	44.0	88	29-115	
cis-1,2-Dichloroethene	ug/L	50	46.0	92	70-130	
cis-1,3-Dichloropropene	ug/L	50	45.9	92	70-130	
Dibromochloromethane	ug/L	50	41.0	82	70-130	
Dibromomethane	ug/L	50	42.9	86	70-130	
Dichlorodifluoromethane	ug/L	50	31.0	62	10-130	
Diisopropyl ether	ug/L	50	37.7	75	70-130	
Ethylbenzene	ug/L	50	50.7	101	80-124	
Hexachloro-1,3-butadiene	ug/L	50	46.6	93	70-130	
Isopropylbenzene (Cumene)	ug/L	50	54.7	109	70-130	
m&p-Xylene	ug/L	100	104	104	70-130	
Methyl-tert-butyl ether	ug/L	50	57.4	115	54-137	
Methylene Chloride	ug/L	50	56.6	113	73-138	
n-Butylbenzene	ug/L	50	49.1	98	70-130	
n-Propylbenzene	ug/L	50	48.4	97	70-130	
Naphthalene	ug/L	50	35.6	71	70-130	
o-Xylene	ug/L	50	53.9	108	70-130	
p-Isopropyltoluene	ug/L	50	50.1	100	70-130	
sec-Butylbenzene	ug/L	50	50.1	100	70-130	
Styrene	ug/L	50	52.4	105	70-130	
tert-Butylbenzene	ug/L	50	48.4	97	70-130	
Tetrachloroethene	ug/L	50	46.0	92	70-130	
Toluene	ug/L	50	45.1	90	80-126	
trans-1,2-Dichloroethene	ug/L	50	59.7	119	73-145	
trans-1,3-Dichloropropene	ug/L	50	39.0	78	70-130	
Trichloroethene	ug/L	50	46.9	94	70-130	
Trichlorofluoromethane	ug/L	50	55.4	111	76-147	
Vinyl chloride	ug/L	50	46.9	94	51-120	
4-Bromofluorobenzene (S)	%			103	70-130	
Dibromofluoromethane (S)	%			99	70-130	
Toluene-d8 (S)	%			94	70-130	

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REPORT OF LABORATORY ANALYSIS

Pace Analytical Services, LLC
1241 Bellevue Street - Suite 9
Green Bay, WI 54302
(920)469-2436

QUALITY CONTROL DATA

Project: N1969A07/010 BETTER BRITE
Pace Project No.: 40187578

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 1867197 1867198

Parameter	Units	40187578009 Result	MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result	MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qual
1,1,1,2-Tetrachloroethane	ug/L	<0.27	50	50	45.0	48.1	90	96	70-130	7	20	
1,1,1-Trichloroethane	ug/L	14.1	50	50	54.1	56.2	80	84	70-130	4	20	
1,1,2,2-Tetrachloroethane	ug/L	<0.28	50	50	38.7	39.8	77	80	70-130	3	20	
1,1,2-Trichloroethane	ug/L	<0.55	50	50	39.4	41.0	79	82	70-137	4	20	
1,1-Dichloroethane	ug/L	0.68J	50	50	38.5	41.1	76	81	73-153	7	20	
1,1-Dichloroethene	ug/L	1.2	50	50	49.5	63.4	97	124	73-138	25	20	R1
1,1-Dichloropropene	ug/L	<0.54	50	50	41.6	45.9	83	92	70-130	10	20	
1,2,3-Trichlorobenzene	ug/L	<0.63	50	50	38.5	41.3	77	83	70-130	7	20	
1,2,3-Trichloropropane	ug/L	<0.59	50	50	44.7	44.5	89	89	70-130	0	20	
1,2,4-Trichlorobenzene	ug/L	<0.95	50	50	40.1	43.5	80	87	70-130	8	20	
1,2,4-Trimethylbenzene	ug/L	<0.84	50	50	42.1	46.5	84	93	70-130	10	20	
1,2-Dibromo-3-chloropropane	ug/L	<1.8	50	50	35.9	37.4	72	75	58-129	4	20	
1,2-Dibromoethane (EDB)	ug/L	<0.83	50	50	41.2	41.7	82	83	70-130	1	20	
1,2-Dichlorobenzene	ug/L	<0.71	50	50	41.6	44.8	83	90	70-130	7	20	
1,2-Dichloroethane	ug/L	<0.28	50	50	36.9	38.4	74	77	75-140	4	20	M1
1,2-Dichloropropane	ug/L	<0.28	50	50	39.5	41.9	79	84	71-138	6	20	
1,3,5-Trimethylbenzene	ug/L	<0.87	50	50	42.2	46.2	84	92	70-130	9	20	
1,3-Dichlorobenzene	ug/L	<0.63	50	50	43.7	47.1	87	94	70-130	7	20	
1,3-Dichloropropane	ug/L	<0.83	50	50	39.3	41.5	79	83	70-130	5	20	
1,4-Dichlorobenzene	ug/L	<0.94	50	50	41.0	44.7	82	89	70-130	9	20	
2,2-Dichloropropane	ug/L	<2.3	50	50	48.4	52.6	97	105	70-130	8	20	
2-Chlorotoluene	ug/L	<0.93	50	50	40.5	44.4	81	89	70-130	9	20	
4-Chlorotoluene	ug/L	<0.76	50	50	42.1	46.0	84	92	70-130	9	20	
Benzene	ug/L	<0.25	50	50	39.2	42.2	78	84	70-130	7	20	
Bromobenzene	ug/L	<0.24	50	50	42.5	45.7	85	91	70-130	7	20	
Bromochloromethane	ug/L	<0.36	50	50	41.6	43.0	83	86	70-130	3	20	
Bromodichloromethane	ug/L	<0.36	50	50	40.9	42.3	82	85	70-130	3	20	
Bromoform	ug/L	<4.0	50	50	38.9	40.6	78	81	68-129	4	20	
Bromomethane	ug/L	<0.97	50	50	54.8	69.3	110	139	15-170	23	20	R1
Carbon tetrachloride	ug/L	<0.17	50	50	42.9	47.0	86	94	70-130	9	20	
Chlorobenzene	ug/L	<0.71	50	50	43.2	46.9	86	94	70-130	8	20	
Chloroethane	ug/L	<1.3	50	50	41.2	51.0	82	102	51-148	21	20	R1
Chloroform	ug/L	<1.3	50	50	41.3	43.8	82	87	74-136	6	20	
Chloromethane	ug/L	<2.2	50	50	39.1	48.5	78	97	23-115	22	20	R1
cis-1,2-Dichloroethene	ug/L	<0.27	50	50	42.3	44.4	85	89	70-131	5	20	
cis-1,3-Dichloropropene	ug/L	<3.6	50	50	41.8	43.7	84	87	70-130	4	20	
Dibromochloromethane	ug/L	<2.6	50	50	41.3	43.3	83	87	70-130	5	20	
Dibromomethane	ug/L	<0.94	50	50	40.6	41.2	81	82	70-130	2	20	
Dichlorodifluoromethane	ug/L	<0.50	50	50	26.8	34.2	54	68	10-132	24	20	R1
Diisopropyl ether	ug/L	<1.9	50	50	34.6	36.5	69	73	70-130	5	20	M1
Ethylbenzene	ug/L	<0.22	50	50	44.5	48.8	89	98	80-125	9	20	
Hexachloro-1,3-butadiene	ug/L	<1.2	50	50	50.9	55.1	102	110	70-130	8	20	
Isopropylbenzene (Cumene)	ug/L	<0.39	50	50	45.4	50.0	91	100	70-130	10	20	
m&p-Xylene	ug/L	<0.47	100	100	90.2	99.1	90	99	70-130	9	20	

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REPORT OF LABORATORY ANALYSIS

Pace Analytical Services, LLC
1241 Bellevue Street - Suite 9
Green Bay, WI 54302
(920)469-2436

QUALITY CONTROL DATA

Project: N1969A07/010 BETTER BRITE
Pace Project No.: 40187578

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 1867197 1867198

Parameter	Units	40187578009 Result	MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result	MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qual
Methyl-tert-butyl ether	ug/L	<1.2	50	50	55.4	57.1	111	114	51-145	3	20	
Methylene Chloride	ug/L	<0.58	50	50	46.2	54.1	92	108	73-140	16	20	
n-Butylbenzene	ug/L	<0.71	50	50	44.5	49.5	89	99	70-130	11	20	
n-Propylbenzene	ug/L	<0.81	50	50	42.0	47.1	84	94	70-130	11	20	
Naphthalene	ug/L	<1.2	50	50	36.2	37.3	72	75	70-130	3	20	
o-Xylene	ug/L	<0.26	50	50	45.6	49.2	91	98	70-130	8	20	
p-Isopropyltoluene	ug/L	<0.80	50	50	45.3	50.1	91	100	70-130	10	20	
sec-Butylbenzene	ug/L	<0.85	50	50	44.8	48.9	90	98	70-130	9	20	
Styrene	ug/L	<0.47	50	50	44.2	47.5	88	95	70-130	7	20	
tert-Butylbenzene	ug/L	<0.30	50	50	43.1	48.1	86	96	70-130	11	20	
Tetrachloroethene	ug/L	0.45J	50	50	44.9	48.4	89	96	70-130	7	20	
Toluene	ug/L	<0.17	50	50	42.7	46.5	85	93	80-131	8	20	
trans-1,2-Dichloroethene	ug/L	<1.1	50	50	52.2	59.1	104	118	73-148	12	20	
trans-1,3-Dichloropropene	ug/L	<4.4	50	50	37.5	39.4	75	79	70-130	5	20	
Trichloroethene	ug/L	<0.26	50	50	41.7	45.4	83	91	70-130	9	20	
Trichlorofluoromethane	ug/L	<0.21	50	50	48.4	62.2	97	124	74-147	25	20	R1
Vinyl chloride	ug/L	<0.17	50	50	41.4	51.0	83	102	41-129	21	20	R1
4-Bromofluorobenzene (S)	%						94	96	70-130			
Dibromofluoromethane (S)	%						96	98	70-130			
Toluene-d8 (S)	%						99	99	70-130			

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REPORT OF LABORATORY ANALYSIS

Pace Analytical Services, LLC
1241 Bellevue Street - Suite 9
Green Bay, WI 54302
(920)469-2436

QUALITY CONTROL DATA

Project: N1969A07/010 BETTER BRITE
Pace Project No.: 40187578

QC Batch: 321397 Analysis Method: SM 3500-Cr B (Online)
QC Batch Method: SM 3500-Cr B (Online) Analysis Description: Chromium, Hexavalent by 3500
Associated Lab Samples: 40187578002, 40187578003, 40187578004, 40187578005, 40187578006, 40187578007, 40187578008, 40187578009

METHOD BLANK: 1866547 Matrix: Water
Associated Lab Samples: 40187578002, 40187578003, 40187578004, 40187578005, 40187578006, 40187578007, 40187578008, 40187578009

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Chromium, Hexavalent	mg/L	<0.0051	0.017	05/15/19 09:15	

LABORATORY CONTROL SAMPLE: 1866548

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Chromium, Hexavalent	mg/L	0.3	0.30	98	90-110	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 1866549 1866550

Parameter	Units	40187578002 Result	MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result	MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qual
Chromium, Hexavalent	mg/L	4.4	7.5	7.5	11.7	11.2	98	91	90-110	4	20	

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REPORT OF LABORATORY ANALYSIS

Pace Analytical Services, LLC
1241 Bellevue Street - Suite 9
Green Bay, WI 54302
(920)469-2436

QUALITY CONTROL DATA

Project: N1969A07/010 BETTER BRITE
Pace Project No.: 40187578

QC Batch: 502028 Analysis Method: EPA 335.4
QC Batch Method: EPA 335.4 Analysis Description: 335.4 Cyanide, Total
Associated Lab Samples: 40187578009

METHOD BLANK: 2316680 Matrix: Water
Associated Lab Samples: 40187578009

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Cyanide	mg/L	<0.0037	0.012	05/23/19 16:34	

LABORATORY CONTROL SAMPLE: 2316681

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Cyanide	mg/L	0.1	0.12	116	90-110	L5

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 2316682 2316683

Parameter	Units	50225774001 Result	MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result	MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qual
Cyanide	mg/L	ND	0.1	0.1	0.10	0.11	103	103	90-110	0	20	

MATRIX SPIKE SAMPLE: 2316684

Parameter	Units	50225774011 Result	Spike Conc.	MS Result	MS % Rec	% Rec Limits	Qualifiers
Cyanide	mg/L	0.19	0.1	0.23	37	90-110	M0

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REPORT OF LABORATORY ANALYSIS

Pace Analytical Services, LLC
1241 Bellevue Street - Suite 9
Green Bay, WI 54302
(920)469-2436

QUALIFIERS

Project: N1969A07/010 BETTER BRITE
Pace Project No.: 40187578

DEFINITIONS

DF - Dilution Factor, if reported, represents the factor applied to the reported data due to dilution of the sample aliquot.

ND - Not Detected at or above LOD.

J - Estimated concentration at or above the LOD and below the LOQ.

LOD - Limit of Detection adjusted for dilution factor, percent moisture, initial weight and final volume.

LOQ - Limit of Quantitation adjusted for dilution factor, percent moisture, initial weight and final volume.

S - Surrogate

1,2-Diphenylhydrazine decomposes to and cannot be separated from Azobenzene using Method 8270. The result for each analyte is a combined concentration.

Consistent with EPA guidelines, unrounded data are displayed and have been used to calculate % recovery and RPD values.

LCS(D) - Laboratory Control Sample (Duplicate)

MS(D) - Matrix Spike (Duplicate)

DUP - Sample Duplicate

RPD - Relative Percent Difference

NC - Not Calculable.

SG - Silica Gel - Clean-Up

U - Indicates the compound was analyzed for, but not detected at or above the adjusted LOD.

N-Nitrosodiphenylamine decomposes and cannot be separated from Diphenylamine using Method 8270. The result reported for each analyte is a combined concentration.

Pace Analytical is TNI accredited. Contact your Pace PM for the current list of accredited analytes.

TNI - The NELAC Institute.

LABORATORIES

PASI-G	Pace Analytical Services - Green Bay
PASI-I	Pace Analytical Services - Indianapolis

ANALYTE QUALIFIERS

D3	Sample was diluted due to the presence of high levels of non-target analytes or other matrix interference.
L5	LCS recovery exceeded QC limits. Batch accepted based on matrix spike recovery within LCS limits.
M0	Matrix spike recovery and/or matrix spike duplicate recovery was outside laboratory control limits.
M1	Matrix spike recovery exceeded QC limits. Batch accepted based on laboratory control sample (LCS) recovery.
R1	RPD value was outside control limits.

Pace Analytical Services, LLC
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QUALITY CONTROL DATA CROSS REFERENCE TABLE

Project: N1969A07/010 BETTER BRITE
Pace Project No.: 40187578

Lab ID	Sample ID	QC Batch Method	QC Batch	Analytical Method	Analytical Batch
40187578001	**TRIP BLANK**	EPA 8260	321411		
40187578009	**ZINC SUMP**	EPA 8260	321411		
40187578002	**W-1**	SM 3500-Cr B (Online)	321397		
40187578003	**W-1A**	SM 3500-Cr B (Online)	321397		
40187578004	**MW-3R**	SM 3500-Cr B (Online)	321397		
40187578005	**MW-5**	SM 3500-Cr B (Online)	321397		
40187578006	**MW-6**	SM 3500-Cr B (Online)	321397		
40187578007	**MW-9**	SM 3500-Cr B (Online)	321397		
40187578008	**MW-10**	SM 3500-Cr B (Online)	321397		
40187578009	**ZINC SUMP**	SM 3500-Cr B (Online)	321397		
40187578009	**ZINC SUMP**	EPA 335.4	502028	EPA 335.4	502239

UPPER MIDWEST REGION
MN: 612-607-1700 WI: 920-469-2436

Page 1 of 1

L01187578

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CHAIN OF CUSTODY

*Preservation Codes
A=None B=HCL C=H2SO4 D=HNO3 E=DI Water F=Methanol G=NaOH
H=Sodium Bisulfate Solution I=Sodium Thiosulfate J=Other

(Please Print Clearly)	
Company Name:	OMNNI Associates
Branch/Location:	Appleton
Project Contact:	Kim Kennedy
Phone:	920.830.6174
Project Number:	N1969A07/010
Project Name:	Better Brite
Project State:	WI
Sampled By (Print):	Kim Kennedy
Sampled By (Sign):	K Kennedy
PO #:	
Regulatory Program:	

Quote #:	
Mail To Contact:	Kim Kennedy
Mail To Company:	OMNNI Associates
Mail To Address:	one Systems Drive Appleton, WI 54914
Invoice To Contact:	
Invoice To Company:	SAME
Invoice To Address:	KKennedy@omnni.com
Invoice To Phone:	920.735.6900

Data Package Options (billable)
☐ EPA Level III
☐ EPA Level IV

MS/MSD
☐ On your sample (billable)
☐ NOT needed on your sample

Matrix Codes
A = Air; W = Water; B = Biota; DW = Drinking Water; C = Charcoal; GW = Ground Water; O = Oil; SW = Surface Water; S = Soil; WW = Waste Water; Sl = Sludge; WP = Wipe

FILTERED? (YES/NO) — Y/N
PRESERVATION (CODE)* — Pick Letter

Analyses Requested: Hexavalent Chromium (A); VOC (B); CYANIDE (G)

PACE LAB #	CLIENT FIELD ID	COLLECTION DATE	COLLECTION TIME	MATRIX	Y/N	Pick Letter	Hexavalent Chromium (A)	VOC (B)	CYANIDE (G)	CLIENT COMMENTS	LAB COMMENTS (Lab Use Only)	Profile #
001	Trip Blank	5/14	0915	W				X				
002	W-1		1211	GW			X					
003	W-1A		1158				X					
004	MW-3R		1241				X					
005	MW-5		1343				X					
006	MW-6		1127				X					
007	MW-9		0956				X					
008	MW-10		1045				X					
009	Zinc Sump		1308				X	X	X			

Rush Turnaround Time Requested - Prelims
(Rush TAT subject to approval/surcharge)
Date Needed:

Transmit Prelim Rush Results by (complete what you want):

Email #1:	
Email #2:	
Telephone:	
Fax:	

Samples on HOLD are subject to special pricing and release of liability

Relinquished By:	Date/Time:	Received By:	Date/Time:
K Kennedy	5/14/19 1539		
		Jane	5/14/19 1539

PACE Project No.: L01187578

Receipt Temp = 0.0 °C

Sample Receipt pH OK / Adjusted

Cooler Custody Seal: Present / Not Present; Intact / Not Intact

C019a(27Jun2006)

Version 6.0 06/14/06

ORIGINAL

Client Name: OMNNI

Sample Preservation Receipt Form

Project # 40187578

Pace Analytical Services, LLC
1241 Bellevue Street, Suite 9
Green Bay, WI 54302

All containers needing preservation have been checked and noted below: ☑Yes ☐No ☐N/A

Initial when completed: SW Date/Time:

Lab Lot# of pH paper: 10453581 Lab Std #ID of preservation (if pH adjusted):

Pace Lab #	Glass							Plastic							Vials						Jars			General			VOA Vials (>6mm) *	H2SO4 pH ≤2	NaOH+Zn Act pH ≥9	NaOH pH ≥12	HNO3 pH ≤2	pH after adjusted	Volume (mL)
	AG1U	AG1H	AG4S	AG4U	AG5U	AG2S	BG3U	BP1U	BP2N	BP2Z	BP3U	BP3B	BP3N	BP3S	DG9A	DG9T	VG9U	VG9H	VG9M	VG9D	JGFU	WGFU	WPFU	SP5T	ZPLC	GN							
001																		2															2.5 / 5 / 10
002											1																						2.5 / 5 / 10
003											1																						2.5 / 5 / 10
004											1																						2.5 / 5 / 10
005											1																						2.5 / 5 / 10
006											1																						2.5 / 5 / 10
007											1																						2.5 / 5 / 10
008											1																						2.5 / 5 / 10
009											1	1						3															2.5 / 5 / 10
010																																	2.5 / 5 / 10
011																																	2.5 / 5 / 10
012																																	2.5 / 5 / 10
013																																	2.5 / 5 / 10
014																																	2.5 / 5 / 10
015																																	2.5 / 5 / 10
016																																	2.5 / 5 / 10
017																																	2.5 / 5 / 10
018																																	2.5 / 5 / 10
019																																	2.5 / 5 / 10
020																																	2.5 / 5 / 10

Exceptions to preservation check: VOA, Coliform, TOC, TOX, TOH, O&G, WI DRO, Phenolics, Other: _____ Headspace in VOA Vials (>6mm) : ☐Yes ☐No ☐N/A ***If yes look in headspace column**

AG1U	1 liter amber glass	BP1U	1 liter plastic unpres	DG9A	40 mL amber ascorbic	JGFU	4 oz amber jar unpres
AG1H	1 liter amber glass HCL	BP2N	500 mL plastic HNO3	DG9T	40 mL amber Na Thio	WGFU	4 oz clear jar unpres
AG4S	125 mL amber glass H2SO4	BP2Z	500 mL plastic NaOH, Znact	VG9U	40 mL clear vial unpres	WPFU	4 oz plastic jar unpres
AG4U	120 mL amber glass unpres	BP3U	250 mL plastic unpres	VG9H	40 mL clear vial HCL		
AG5U	100 mL amber glass unpres	BP3B	250 mL plastic NaOH	VG9M	40 mL clear vial MeOH	SP5T	120 mL plastic Na Thiosulfate
AG2S	500 mL amber glass H2SO4	BP3N	250 mL plastic HNO3	VG9D	40 mL clear vial DI	ZPLC	ziploc bag
BG3U	250 mL clear glass unpres	BP3S	250 mL plastic H2SO4			GN:	

Pace Analytical 1241 Bellevue Street, Green Bay, WI 54302	Document Name: **Sample Condition Upon Receipt (SCUR)**	Document Revised: 25Apr2018
	Document No.: **F-GB-C-031-Rev.07**	Issuing Authority: Pace Green Bay Quality Office

Sample Condition Upon Receipt Form (SCUR)

Client Name: OMNNI

Project #: **WO#: 40187578**

40187578

Courier: ☐ CS Logistics ☐ Fed Ex ☐ Speedee ☐ UPS ☐ Waltco ☒ Client ☐ Pace Other: _____

Tracking #: _____

Custody Seal on Cooler/Box Present: ☐ yes ☒ no Seals intact: ☐ yes ☐ no

Custody Seal on Samples Present: ☐ yes ☒ no Seals intact: ☐ yes ☐ no

Packing Material: ☐ Bubble Wrap ☒ Bubble Bags ☐ None ☐ Other _____

Thermometer Used SR - N/A **Type of Ice:** (Wet) Blue Dry None ☒ Samples on ice, cooling process has begun

Cooler Temperature Uncorr: ROT /Corr: _____

Temp Blank Present: ☐ yes ☒ no **Biological Tissue is Frozen:** ☐ yes ☐ no

Person examining contents:
Date: 5-14-19
Initials: SW

Temp should be above freezing to 6°C.
Biota Samples may be received at ≤ 0°C.

Chain of Custody Present:	☑Yes ☐No ☐N/A	1.
Chain of Custody Filled Out:	☑Yes ☐No ☐N/A	2.
Chain of Custody Relinquished:	☑Yes ☐No ☐N/A	3.
Sampler Name & Signature on COC:	☑Yes ☐No ☐N/A	4.
Samples Arrived within Hold Time:	☑Yes ☐No	5.
- VOA Samples frozen upon receipt	☐Yes ☐No	Date/Time:
Short Hold Time Analysis (<72hr):	☑Yes ☐No	6.
Rush Turn Around Time Requested:	☐Yes ☑No	7.
Sufficient Volume: For Analysis: ☑Yes ☐No MS/MSD: ☐Yes ☑No ☐N/A		8.
Correct Containers Used:	☑Yes ☐No	9.
-Pace Containers Used:	☑Yes ☐No ☐N/A	
-Pace IR Containers Used:	☐Yes ☐No ☑N/A	
Containers Intact:	☑Yes ☐No	10.
Filtered volume received for Dissolved tests	☐Yes ☐No ☑N/A	11.
Sample Labels match COC:	☐Yes ☑No ☐N/A	12. No collect times 5-14-19 SW
-Includes date/time/ID/Analysis Matrix: W		
Trip Blank Present:	☑Yes ☐No ☐N/A	13.
Trip Blank Custody Seals Present	☑Yes ☐No ☐N/A	
Pace Trip Blank Lot # (if purchased): 423		

Client Notification/ Resolution: If checked, see attached form for additional comments ☐

Person Contacted: _____ Date/Time: _____

Comments/ Resolution: _____

Project Manager Review: _____ **Date:** 5/15/19

Pace Analytical Services, LLC
1241 Bellevue Street - Suite 9
Green Bay, WI 54302
(920)469-2436

May 22, 2019

Brian Wayner
Omnni Associates, Inc.
One Systems Drive
Appleton, WI 549141654

RE: Project: N1969A07/010 BETTER BRITE
Pace Project No.: 40187620

Dear Brian Wayner:
Enclosed are the analytical results for sample(s) received by the laboratory on May 15, 2019. The results relate only to the samples included in this report. Results reported herein conform to the most current, applicable TNI/NELAC standards and the laboratory's Quality Assurance Manual, where applicable, unless otherwise noted in the body of the report.

If you have any questions concerning this report, please feel free to contact me.

Sincerely,

Steven Mleczko
steve.mleczko@pacelabs.com
(920)469-2436
Project Manager

Enclosures

cc: Chris Rogers, OMNNI ASSOCIATES, INC.

Pace Analytical Services, LLC
1241 Bellevue Street - Suite 9
Green Bay, WI 54302
(920)469-2436

CERTIFICATIONS

Project: N1969A07/010 BETTER BRITE
Pace Project No.: 40187620

Green Bay Certification IDs

1241 Bellevue Street, Green Bay, WI 54302
Florida/NELAP Certification #: E87948
Illinois Certification #: 200050
Kentucky UST Certification #: 82
Louisiana Certification #: 04168
Minnesota Certification #: 055-999-334
New York Certification #: 12064
North Dakota Certification #: R-150
Virginia VELAP ID: 460263
South Carolina Certification #: 83006001
Texas Certification #: T104704529-14-1
Wisconsin Certification #: 405132750
Wisconsin DATCP Certification #: 105-444
USDA Soil Permit #: P330-16-00157
Federal Fish & Wildlife Permit #: LE51774A-0

REPORT OF LABORATORY ANALYSIS

Pace Analytical Services, LLC
1241 Bellevue Street - Suite 9
Green Bay, WI 54302
(920)469-2436

SAMPLE SUMMARY

Project: N1969A07/010 BETTER BRITE
Pace Project No.: 40187620

Lab ID	Sample ID	Matrix	Date Collected	Date Received
40187620001	**TRIP BLANK**	Water	05/15/19 00:00	05/15/19 12:32
40187620002	**MW-111**	Water	05/15/19 10:52	05/15/19 12:32
40187620003	**MW-115**	Water	05/15/19 11:36	05/15/19 12:32
40187620004	**MW-115A**	Water	05/15/19 11:32	05/15/19 12:32
40187620005	**MW-116**	Water	05/15/19 10:27	05/15/19 12:32

Pace Analytical Services, LLC
1241 Bellevue Street - Suite 9
Green Bay, WI 54302
(920)469-2436

SAMPLE ANALYTE COUNT

Project: N1969A07/010 BETTER BRITE
Pace Project No.: 40187620

Lab ID	Sample ID	Method	Analysts	Analytes Reported	Laboratory
40187620001	**TRIP BLANK**	EPA 8260	HNW	64	PASI-G
40187620002	**MW-111**	SM 3500-Cr B (Online)	DEY	1	PASI-G
40187620003	**MW-115**	SM 3500-Cr B (Online)	DEY	1	PASI-G
40187620004	**MW-115A**	SM 3500-Cr B (Online)	DEY	1	PASI-G
40187620005	**MW-116**	EPA 8260	HNW	64	PASI-G
		SM 3500-Cr B (Online)	DEY	1	PASI-G

REPORT OF LABORATORY ANALYSIS

Pace Analytical Services, LLC
1241 Bellevue Street - Suite 9
Green Bay, WI 54302
(920)469-2436

ANALYTICAL RESULTS

Project: N1969A07/010 BETTER BRITE
Pace Project No.: 40187620

Sample: TRIP BLANK **Lab ID: 40187620001** Collected: 05/15/19 00:00 Received: 05/15/19 12:32 Matrix: Water

Parameters	Results	Units	LOQ	LOD	DF	Prepared	Analyzed	CAS No.	Qual
8260 MSV	Analytical Method: EPA 8260								
Benzene	**<0.25**	ug/L	1.0	0.25	1		05/17/19 23:52	71-43-2	
Bromobenzene	**<0.24**	ug/L	1.0	0.24	1		05/17/19 23:52	108-86-1	
Bromochloromethane	**<0.36**	ug/L	5.0	0.36	1		05/17/19 23:52	74-97-5	
Bromodichloromethane	**<0.36**	ug/L	1.2	0.36	1		05/17/19 23:52	75-27-4	
Bromoform	**<4.0**	ug/L	13.2	4.0	1		05/17/19 23:52	75-25-2	
Bromomethane	**<0.97**	ug/L	5.0	0.97	1		05/17/19 23:52	74-83-9	
n-Butylbenzene	**<0.71**	ug/L	2.4	0.71	1		05/17/19 23:52	104-51-8	
sec-Butylbenzene	**<0.85**	ug/L	5.0	0.85	1		05/17/19 23:52	135-98-8	
tert-Butylbenzene	**<0.30**	ug/L	1.0	0.30	1		05/17/19 23:52	98-06-6	
Carbon tetrachloride	**<0.17**	ug/L	1.0	0.17	1		05/17/19 23:52	56-23-5	
Chlorobenzene	**<0.71**	ug/L	2.4	0.71	1		05/17/19 23:52	108-90-7	
Chloroethane	**<1.3**	ug/L	5.0	1.3	1		05/17/19 23:52	75-00-3	
Chloroform	**<1.3**	ug/L	5.0	1.3	1		05/17/19 23:52	67-66-3	
Chloromethane	**<2.2**	ug/L	7.3	2.2	1		05/17/19 23:52	74-87-3	
2-Chlorotoluene	**<0.93**	ug/L	5.0	0.93	1		05/17/19 23:52	95-49-8	
4-Chlorotoluene	**<0.76**	ug/L	2.5	0.76	1		05/17/19 23:52	106-43-4	
1,2-Dibromo-3-chloropropane	**<1.8**	ug/L	5.9	1.8	1		05/17/19 23:52	96-12-8	
Dibromochloromethane	**<2.6**	ug/L	8.7	2.6	1		05/17/19 23:52	124-48-1	
1,2-Dibromoethane (EDB)	**<0.83**	ug/L	2.8	0.83	1		05/17/19 23:52	106-93-4	
Dibromomethane	**<0.94**	ug/L	3.1	0.94	1		05/17/19 23:52	74-95-3	
1,2-Dichlorobenzene	**<0.71**	ug/L	2.4	0.71	1		05/17/19 23:52	95-50-1	
1,3-Dichlorobenzene	**<0.63**	ug/L	2.1	0.63	1		05/17/19 23:52	541-73-1	
1,4-Dichlorobenzene	**<0.94**	ug/L	3.1	0.94	1		05/17/19 23:52	106-46-7	
Dichlorodifluoromethane	**<0.50**	ug/L	5.0	0.50	1		05/17/19 23:52	75-71-8	
1,1-Dichloroethane	**<0.27**	ug/L	1.0	0.27	1		05/17/19 23:52	75-34-3	
1,2-Dichloroethane	**<0.28**	ug/L	1.0	0.28	1		05/17/19 23:52	107-06-2	
1,1-Dichloroethene	**<0.24**	ug/L	1.0	0.24	1		05/17/19 23:52	75-35-4	
cis-1,2-Dichloroethene	**<0.27**	ug/L	1.0	0.27	1		05/17/19 23:52	156-59-2	
trans-1,2-Dichloroethene	**<1.1**	ug/L	3.6	1.1	1		05/17/19 23:52	156-60-5	
1,2-Dichloropropane	**<0.28**	ug/L	1.0	0.28	1		05/17/19 23:52	78-87-5	
1,3-Dichloropropane	**<0.83**	ug/L	2.8	0.83	1		05/17/19 23:52	142-28-9	
2,2-Dichloropropane	**<2.3**	ug/L	7.6	2.3	1		05/17/19 23:52	594-20-7	
1,1-Dichloropropene	**<0.54**	ug/L	1.8	0.54	1		05/17/19 23:52	563-58-6	
cis-1,3-Dichloropropene	**<3.6**	ug/L	12.1	3.6	1		05/17/19 23:52	10061-01-5	
trans-1,3-Dichloropropene	**<4.4**	ug/L	14.6	4.4	1		05/17/19 23:52	10061-02-6	
Diisopropyl ether	**<1.9**	ug/L	6.3	1.9	1		05/17/19 23:52	108-20-3	
Ethylbenzene	**<0.22**	ug/L	1.0	0.22	1		05/17/19 23:52	100-41-4	
Hexachloro-1,3-butadiene	**<1.2**	ug/L	5.0	1.2	1		05/17/19 23:52	87-68-3	
Isopropylbenzene (Cumene)	**<0.39**	ug/L	5.0	0.39	1		05/17/19 23:52	98-82-8	
p-Isopropyltoluene	**<0.80**	ug/L	2.7	0.80	1		05/17/19 23:52	99-87-6	
Methylene Chloride	**<0.58**	ug/L	5.0	0.58	1		05/17/19 23:52	75-09-2	
Methyl-tert-butyl ether	**<1.2**	ug/L	4.2	1.2	1		05/17/19 23:52	1634-04-4	
Naphthalene	**<1.2**	ug/L	5.0	1.2	1		05/17/19 23:52	91-20-3	
n-Propylbenzene	**<0.81**	ug/L	5.0	0.81	1		05/17/19 23:52	103-65-1	
Styrene	**<0.47**	ug/L	1.6	0.47	1		05/17/19 23:52	100-42-5	
1,1,1,2-Tetrachloroethane	**<0.27**	ug/L	1.0	0.27	1		05/17/19 23:52	630-20-6	

REPORT OF LABORATORY ANALYSIS

Pace Analytical Services, LLC
1241 Bellevue Street - Suite 9
Green Bay, WI 54302
(920)469-2436

ANALYTICAL RESULTS

Project: N1969A07/010 BETTER BRITE
Pace Project No.: 40187620

Sample: TRIP BLANK **Lab ID: 40187620001** Collected: 05/15/19 00:00 Received: 05/15/19 12:32 Matrix: Water

Parameters	Results	Units	LOQ	LOD	DF	Prepared	Analyzed	CAS No.	Qual
8260 MSV	Analytical Method: EPA 8260								
1,1,2,2-Tetrachloroethane	**<0.28**	ug/L	1.0	0.28	1		05/17/19 23:52	79-34-5	
Tetrachloroethene	**<0.33**	ug/L	1.1	0.33	1		05/17/19 23:52	127-18-4	
Toluene	**<0.17**	ug/L	5.0	0.17	1		05/17/19 23:52	108-88-3	
1,2,3-Trichlorobenzene	**<0.63**	ug/L	5.0	0.63	1		05/17/19 23:52	87-61-6	
1,2,4-Trichlorobenzene	**<0.95**	ug/L	5.0	0.95	1		05/17/19 23:52	120-82-1	
1,1,1-Trichloroethane	**<0.24**	ug/L	1.0	0.24	1		05/17/19 23:52	71-55-6	
1,1,2-Trichloroethane	**<0.55**	ug/L	5.0	0.55	1		05/17/19 23:52	79-00-5	
Trichloroethene	**<0.26**	ug/L	1.0	0.26	1		05/17/19 23:52	79-01-6	
Trichlorofluoromethane	**<0.21**	ug/L	1.0	0.21	1		05/17/19 23:52	75-69-4	
1,2,3-Trichloropropane	**<0.59**	ug/L	5.0	0.59	1		05/17/19 23:52	96-18-4	
1,2,4-Trimethylbenzene	**<0.84**	ug/L	2.8	0.84	1		05/17/19 23:52	95-63-6	
1,3,5-Trimethylbenzene	**<0.87**	ug/L	2.9	0.87	1		05/17/19 23:52	108-67-8	
Vinyl chloride	**<0.17**	ug/L	1.0	0.17	1		05/17/19 23:52	75-01-4	
m&p-Xylene	**<0.47**	ug/L	2.0	0.47	1		05/17/19 23:52	179601-23-1	
o-Xylene	**<0.26**	ug/L	1.0	0.26	1		05/17/19 23:52	95-47-6	
Surrogates									
4-Bromofluorobenzene (S)	100	%	70-130		1		05/17/19 23:52	460-00-4	
Dibromofluoromethane (S)	101	%	70-130		1		05/17/19 23:52	1868-53-7	
Toluene-d8 (S)	99	%	70-130		1		05/17/19 23:52	2037-26-5	

Sample: MW-111 **Lab ID: 40187620002** Collected: 05/15/19 10:52 Received: 05/15/19 12:32 Matrix: Water

Parameters	Results	Units	LOQ	LOD	DF	Prepared	Analyzed	CAS No.	Qual
Chromium, Hexavalent	Analytical Method: SM 3500-Cr B (Online)								
Chromium, Hexavalent	**<0.13**	mg/L	0.43	0.13	25		05/16/19 09:30		D3

Sample: MW-115 **Lab ID: 40187620003** Collected: 05/15/19 11:36 Received: 05/15/19 12:32 Matrix: Water

Parameters	Results	Units	LOQ	LOD	DF	Prepared	Analyzed	CAS No.	Qual
Chromium, Hexavalent	Analytical Method: SM 3500-Cr B (Online)								
Chromium, Hexavalent	**<0.051**	mg/L	0.17	0.051	10		05/16/19 09:30		D3

Sample: MW-115A **Lab ID: 40187620004** Collected: 05/15/19 11:32 Received: 05/15/19 12:32 Matrix: Water

Parameters	Results	Units	LOQ	LOD	DF	Prepared	Analyzed	CAS No.	Qual
Chromium, Hexavalent	Analytical Method: SM 3500-Cr B (Online)								
Chromium, Hexavalent	**<0.051**	mg/L	0.17	0.051	10		05/16/19 09:30		D3

REPORT OF LABORATORY ANALYSIS

Pace Analytical Services, LLC
1241 Bellevue Street - Suite 9
Green Bay, WI 54302
(920)469-2436

ANALYTICAL RESULTS

Project: N1969A07/010 BETTER BRITE
Pace Project No.: 40187620

Sample: MW-116 **Lab ID: 40187620005** Collected: 05/15/19 10:27 Received: 05/15/19 12:32 Matrix: Water

Parameters	Results	Units	LOQ	LOD	DF	Prepared	Analyzed	CAS No.	Qual
8260 MSV	Analytical Method: EPA 8260								
Benzene	**<0.25**	ug/L	1.0	0.25	1		05/17/19 21:15	71-43-2	
Bromobenzene	**<0.24**	ug/L	1.0	0.24	1		05/17/19 21:15	108-86-1	
Bromochloromethane	**<0.36**	ug/L	5.0	0.36	1		05/17/19 21:15	74-97-5	
Bromodichloromethane	**<0.36**	ug/L	1.2	0.36	1		05/17/19 21:15	75-27-4	
Bromoform	**<4.0**	ug/L	13.2	4.0	1		05/17/19 21:15	75-25-2	
Bromomethane	**<0.97**	ug/L	5.0	0.97	1		05/17/19 21:15	74-83-9	
n-Butylbenzene	**<0.71**	ug/L	2.4	0.71	1		05/17/19 21:15	104-51-8	
sec-Butylbenzene	**<0.85**	ug/L	5.0	0.85	1		05/17/19 21:15	135-98-8	
tert-Butylbenzene	**<0.30**	ug/L	1.0	0.30	1		05/17/19 21:15	98-06-6	
Carbon tetrachloride	**<0.17**	ug/L	1.0	0.17	1		05/17/19 21:15	56-23-5	
Chlorobenzene	**<0.71**	ug/L	2.4	0.71	1		05/17/19 21:15	108-90-7	
Chloroethane	**<1.3**	ug/L	5.0	1.3	1		05/17/19 21:15	75-00-3	
Chloroform	**<1.3**	ug/L	5.0	1.3	1		05/17/19 21:15	67-66-3	
Chloromethane	**<2.2**	ug/L	7.3	2.2	1		05/17/19 21:15	74-87-3	
2-Chlorotoluene	**<0.93**	ug/L	5.0	0.93	1		05/17/19 21:15	95-49-8	
4-Chlorotoluene	**<0.76**	ug/L	2.5	0.76	1		05/17/19 21:15	106-43-4	
1,2-Dibromo-3-chloropropane	**<1.8**	ug/L	5.9	1.8	1		05/17/19 21:15	96-12-8	
Dibromochloromethane	**<2.6**	ug/L	8.7	2.6	1		05/17/19 21:15	124-48-1	
1,2-Dibromoethane (EDB)	**<0.83**	ug/L	2.8	0.83	1		05/17/19 21:15	106-93-4	
Dibromomethane	**<0.94**	ug/L	3.1	0.94	1		05/17/19 21:15	74-95-3	
1,2-Dichlorobenzene	**<0.71**	ug/L	2.4	0.71	1		05/17/19 21:15	95-50-1	
1,3-Dichlorobenzene	**<0.63**	ug/L	2.1	0.63	1		05/17/19 21:15	541-73-1	
1,4-Dichlorobenzene	**<0.94**	ug/L	3.1	0.94	1		05/17/19 21:15	106-46-7	
Dichlorodifluoromethane	**<0.50**	ug/L	5.0	0.50	1		05/17/19 21:15	75-71-8	
1,1-Dichloroethane	**38.9**	ug/L	1.0	0.27	1		05/17/19 21:15	75-34-3	
1,2-Dichloroethane	**<0.28**	ug/L	1.0	0.28	1		05/17/19 21:15	107-06-2	
1,1-Dichloroethene	**44.3**	ug/L	1.0	0.24	1		05/17/19 21:15	75-35-4	
cis-1,2-Dichloroethene	**1.3**	ug/L	1.0	0.27	1		05/17/19 21:15	156-59-2	
trans-1,2-Dichloroethene	**<1.1**	ug/L	3.6	1.1	1		05/17/19 21:15	156-60-5	
1,2-Dichloropropane	**<0.28**	ug/L	1.0	0.28	1		05/17/19 21:15	78-87-5	
1,3-Dichloropropane	**<0.83**	ug/L	2.8	0.83	1		05/17/19 21:15	142-28-9	
2,2-Dichloropropane	**<2.3**	ug/L	7.6	2.3	1		05/17/19 21:15	594-20-7	
1,1-Dichloropropene	**<0.54**	ug/L	1.8	0.54	1		05/17/19 21:15	563-58-6	
cis-1,3-Dichloropropene	**<3.6**	ug/L	12.1	3.6	1		05/17/19 21:15	10061-01-5	
trans-1,3-Dichloropropene	**<4.4**	ug/L	14.6	4.4	1		05/17/19 21:15	10061-02-6	
Diisopropyl ether	**<1.9**	ug/L	6.3	1.9	1		05/17/19 21:15	108-20-3	
Ethylbenzene	**<0.22**	ug/L	1.0	0.22	1		05/17/19 21:15	100-41-4	
Hexachloro-1,3-butadiene	**<1.2**	ug/L	5.0	1.2	1		05/17/19 21:15	87-68-3	
Isopropylbenzene (Cumene)	**<0.39**	ug/L	5.0	0.39	1		05/17/19 21:15	98-82-8	
p-Isopropyltoluene	**<0.80**	ug/L	2.7	0.80	1		05/17/19 21:15	99-87-6	
Methylene Chloride	**<0.58**	ug/L	5.0	0.58	1		05/17/19 21:15	75-09-2	
Methyl-tert-butyl ether	**<1.2**	ug/L	4.2	1.2	1		05/17/19 21:15	1634-04-4	
Naphthalene	**<1.2**	ug/L	5.0	1.2	1		05/17/19 21:15	91-20-3	
n-Propylbenzene	**<0.81**	ug/L	5.0	0.81	1		05/17/19 21:15	103-65-1	
Styrene	**<0.47**	ug/L	1.6	0.47	1		05/17/19 21:15	100-42-5	
1,1,1,2-Tetrachloroethane	**<0.27**	ug/L	1.0	0.27	1		05/17/19 21:15	630-20-6	

REPORT OF LABORATORY ANALYSIS

Pace Analytical Services, LLC
1241 Bellevue Street - Suite 9
Green Bay, WI 54302
(920)469-2436

ANALYTICAL RESULTS

Project: N1969A07/010 BETTER BRITE
Pace Project No.: 40187620

Sample: MW-116 **Lab ID: 40187620005** Collected: 05/15/19 10:27 Received: 05/15/19 12:32 Matrix: Water

Parameters	Results	Units	LOQ	LOD	DF	Prepared	Analyzed	CAS No.	Qual
8260 MSV	Analytical Method: EPA 8260								
1,1,2,2-Tetrachloroethane	**<0.28**	ug/L	1.0	0.28	1		05/17/19 21:15	79-34-5	
Tetrachloroethene	**1.2**	ug/L	1.1	0.33	1		05/17/19 21:15	127-18-4	
Toluene	**<0.17**	ug/L	5.0	0.17	1		05/17/19 21:15	108-88-3	
1,2,3-Trichlorobenzene	**<0.63**	ug/L	5.0	0.63	1		05/17/19 21:15	87-61-6	
1,2,4-Trichlorobenzene	**<0.95**	ug/L	5.0	0.95	1		05/17/19 21:15	120-82-1	
1,1,1-Trichloroethane	**142**	ug/L	1.0	0.24	1		05/17/19 21:15	71-55-6	
1,1,2-Trichloroethane	**<0.55**	ug/L	5.0	0.55	1		05/17/19 21:15	79-00-5	
Trichloroethene	**2.1**	ug/L	1.0	0.26	1		05/17/19 21:15	79-01-6	
Trichlorofluoromethane	**<0.21**	ug/L	1.0	0.21	1		05/17/19 21:15	75-69-4	
1,2,3-Trichloropropane	**<0.59**	ug/L	5.0	0.59	1		05/17/19 21:15	96-18-4	
1,2,4-Trimethylbenzene	**<0.84**	ug/L	2.8	0.84	1		05/17/19 21:15	95-63-6	
1,3,5-Trimethylbenzene	**<0.87**	ug/L	2.9	0.87	1		05/17/19 21:15	108-67-8	
Vinyl chloride	**<0.17**	ug/L	1.0	0.17	1		05/17/19 21:15	75-01-4	
m&p-Xylene	**<0.47**	ug/L	2.0	0.47	1		05/17/19 21:15	179601-23-1	
o-Xylene	**<0.26**	ug/L	1.0	0.26	1		05/17/19 21:15	95-47-6	
Surrogates									
4-Bromofluorobenzene (S)	99	%	70-130		1		05/17/19 21:15	460-00-4	
Dibromofluoromethane (S)	102	%	70-130		1		05/17/19 21:15	1868-53-7	
Toluene-d8 (S)	99	%	70-130		1		05/17/19 21:15	2037-26-5	
Chromium, Hexavalent	Analytical Method: SM 3500-Cr B (Online)								
Chromium, Hexavalent	**9.8**	mg/L	0.86	0.26	50		05/16/19 09:30		

REPORT OF LABORATORY ANALYSIS

Pace Analytical Services, LLC
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(920)469-2436

QUALITY CONTROL DATA

Project: N1969A07/010 BETTER BRITE
Pace Project No.: 40187620

QC Batch: 321680 Analysis Method: EPA 8260
QC Batch Method: EPA 8260 Analysis Description: 8260 MSV
Associated Lab Samples: 40187620001, 40187620005

METHOD BLANK: 1868100 Matrix: Water
Associated Lab Samples: 40187620001, 40187620005

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
1,1,1,2-Tetrachloroethane	ug/L	<0.27	1.0	05/17/19 15:37	
1,1,1-Trichloroethane	ug/L	<0.24	1.0	05/17/19 15:37	
1,1,2,2-Tetrachloroethane	ug/L	<0.28	1.0	05/17/19 15:37	
1,1,2-Trichloroethane	ug/L	<0.55	5.0	05/17/19 15:37	
1,1-Dichloroethane	ug/L	<0.27	1.0	05/17/19 15:37	
1,1-Dichloroethene	ug/L	<0.24	1.0	05/17/19 15:37	
1,1-Dichloropropene	ug/L	<0.54	1.8	05/17/19 15:37	
1,2,3-Trichlorobenzene	ug/L	<0.63	5.0	05/17/19 15:37	
1,2,3-Trichloropropane	ug/L	<0.59	5.0	05/17/19 15:37	
1,2,4-Trichlorobenzene	ug/L	<0.95	5.0	05/17/19 15:37	
1,2,4-Trimethylbenzene	ug/L	<0.84	2.8	05/17/19 15:37	
1,2-Dibromo-3-chloropropane	ug/L	<1.8	5.9	05/17/19 15:37	
1,2-Dibromoethane (EDB)	ug/L	<0.83	2.8	05/17/19 15:37	
1,2-Dichlorobenzene	ug/L	<0.71	2.4	05/17/19 15:37	
1,2-Dichloroethane	ug/L	<0.28	1.0	05/17/19 15:37	
1,2-Dichloropropane	ug/L	<0.28	1.0	05/17/19 15:37	
1,3,5-Trimethylbenzene	ug/L	<0.87	2.9	05/17/19 15:37	
1,3-Dichlorobenzene	ug/L	<0.63	2.1	05/17/19 15:37	
1,3-Dichloropropane	ug/L	<0.83	2.8	05/17/19 15:37	
1,4-Dichlorobenzene	ug/L	<0.94	3.1	05/17/19 15:37	
2,2-Dichloropropane	ug/L	<2.3	7.6	05/17/19 15:37	
2-Chlorotoluene	ug/L	<0.93	5.0	05/17/19 15:37	
4-Chlorotoluene	ug/L	<0.76	2.5	05/17/19 15:37	
Benzene	ug/L	<0.25	1.0	05/17/19 15:37	
Bromobenzene	ug/L	<0.24	1.0	05/17/19 15:37	
Bromochloromethane	ug/L	<0.36	5.0	05/17/19 15:37	
Bromodichloromethane	ug/L	<0.36	1.2	05/17/19 15:37	
Bromoform	ug/L	<4.0	13.2	05/17/19 15:37	
Bromomethane	ug/L	<0.97	5.0	05/17/19 15:37	
Carbon tetrachloride	ug/L	<0.17	1.0	05/17/19 15:37	
Chlorobenzene	ug/L	<0.71	2.4	05/17/19 15:37	
Chloroethane	ug/L	<1.3	5.0	05/17/19 15:37	
Chloroform	ug/L	<1.3	5.0	05/17/19 15:37	
Chloromethane	ug/L	<2.2	7.3	05/17/19 15:37	
cis-1,2-Dichloroethene	ug/L	<0.27	1.0	05/17/19 15:37	
cis-1,3-Dichloropropene	ug/L	<3.6	12.1	05/17/19 15:37	
Dibromochloromethane	ug/L	<2.6	8.7	05/17/19 15:37	
Dibromomethane	ug/L	<0.94	3.1	05/17/19 15:37	
Dichlorodifluoromethane	ug/L	<0.50	5.0	05/17/19 15:37	
Diisopropyl ether	ug/L	<1.9	6.3	05/17/19 15:37	
Ethylbenzene	ug/L	<0.22	1.0	05/17/19 15:37	

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REPORT OF LABORATORY ANALYSIS

Pace Analytical Services, LLC
1241 Bellevue Street - Suite 9
Green Bay, WI 54302
(920)469-2436

QUALITY CONTROL DATA

Project: N1969A07/010 BETTER BRITE
Pace Project No.: 40187620

METHOD BLANK: 1868100 Matrix: Water
Associated Lab Samples: 40187620001, 40187620005

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Hexachloro-1,3-butadiene	ug/L	1.3J	5.0	05/17/19 15:37	
Isopropylbenzene (Cumene)	ug/L	<0.39	5.0	05/17/19 15:37	
m&p-Xylene	ug/L	<0.47	2.0	05/17/19 15:37	
Methyl-tert-butyl ether	ug/L	<1.2	4.2	05/17/19 15:37	
Methylene Chloride	ug/L	<0.58	5.0	05/17/19 15:37	
n-Butylbenzene	ug/L	<0.71	2.4	05/17/19 15:37	
n-Propylbenzene	ug/L	<0.81	5.0	05/17/19 15:37	
Naphthalene	ug/L	<1.2	5.0	05/17/19 15:37	
o-Xylene	ug/L	<0.26	1.0	05/17/19 15:37	
p-Isopropyltoluene	ug/L	<0.80	2.7	05/17/19 15:37	
sec-Butylbenzene	ug/L	<0.85	5.0	05/17/19 15:37	
Styrene	ug/L	<0.47	1.6	05/17/19 15:37	
tert-Butylbenzene	ug/L	<0.30	1.0	05/17/19 15:37	
Tetrachloroethene	ug/L	<0.33	1.1	05/17/19 15:37	
Toluene	ug/L	<0.17	5.0	05/17/19 15:37	
trans-1,2-Dichloroethene	ug/L	<1.1	3.6	05/17/19 15:37	
trans-1,3-Dichloropropene	ug/L	<4.4	14.6	05/17/19 15:37	
Trichloroethene	ug/L	<0.26	1.0	05/17/19 15:37	
Trichlorofluoromethane	ug/L	<0.21	1.0	05/17/19 15:37	
Vinyl chloride	ug/L	<0.17	1.0	05/17/19 15:37	
4-Bromofluorobenzene (S)	%	100	70-130	05/17/19 15:37	
Dibromofluoromethane (S)	%	101	70-130	05/17/19 15:37	
Toluene-d8 (S)	%	100	70-130	05/17/19 15:37	

LABORATORY CONTROL SAMPLE: 1868101

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
1,1,1-Trichloroethane	ug/L	50	52.4	105	70-130	
1,1,2,2-Tetrachloroethane	ug/L	50	50.3	101	70-130	
1,1,2-Trichloroethane	ug/L	50	54.3	109	70-130	
1,1-Dichloroethane	ug/L	50	56.7	113	73-150	
1,1-Dichloroethene	ug/L	50	57.2	114	73-138	
1,2,4-Trichlorobenzene	ug/L	50	48.1	96	70-130	
1,2-Dibromo-3-chloropropane	ug/L	50	44.4	89	64-129	
1,2-Dibromoethane (EDB)	ug/L	50	52.1	104	70-130	
1,2-Dichlorobenzene	ug/L	50	47.5	95	70-130	
1,2-Dichloroethane	ug/L	50	54.1	108	75-140	
1,2-Dichloropropane	ug/L	50	53.8	108	73-135	
1,3-Dichlorobenzene	ug/L	50	47.3	95	70-130	
1,4-Dichlorobenzene	ug/L	50	47.4	95	70-130	
Benzene	ug/L	50	58.5	117	70-130	
Bromodichloromethane	ug/L	50	56.2	112	70-130	
Bromoform	ug/L	50	46.2	92	68-129	
Bromomethane	ug/L	50	42.4	85	18-159	

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REPORT OF LABORATORY ANALYSIS

Pace Analytical Services, LLC
1241 Bellevue Street - Suite 9
Green Bay, WI 54302
(920)469-2436

QUALITY CONTROL DATA

Project: N1969A07/010 BETTER BRITE
Pace Project No.: 40187620

LABORATORY CONTROL SAMPLE: 1868101

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Carbon tetrachloride	ug/L	50	51.1	102	70-130	
Chlorobenzene	ug/L	50	50.3	101	70-130	
Chloroethane	ug/L	50	50.5	101	53-147	
Chloroform	ug/L	50	54.9	110	74-136	
Chloromethane	ug/L	50	36.5	73	29-115	
cis-1,2-Dichloroethene	ug/L	50	54.7	109	70-130	
cis-1,3-Dichloropropene	ug/L	50	49.4	99	70-130	
Dibromochloromethane	ug/L	50	46.0	92	70-130	
Dichlorodifluoromethane	ug/L	50	34.2	68	10-130	
Ethylbenzene	ug/L	50	56.0	112	80-124	
Isopropylbenzene (Cumene)	ug/L	50	56.7	113	70-130	
m&p-Xylene	ug/L	100	113	113	70-130	
Methyl-tert-butyl ether	ug/L	50	55.9	112	54-137	
Methylene Chloride	ug/L	50	56.2	112	73-138	
o-Xylene	ug/L	50	55.1	110	70-130	
Styrene	ug/L	50	54.5	109	70-130	
Tetrachloroethene	ug/L	50	53.0	106	70-130	
Toluene	ug/L	50	55.0	110	80-126	
trans-1,2-Dichloroethene	ug/L	50	56.4	113	73-145	
trans-1,3-Dichloropropene	ug/L	50	48.2	96	70-130	
Trichloroethene	ug/L	50	54.5	109	70-130	
Trichlorofluoromethane	ug/L	50	54.4	109	76-147	
Vinyl chloride	ug/L	50	49.2	98	51-120	
4-Bromofluorobenzene (S)	%			107	70-130	
Dibromofluoromethane (S)	%			101	70-130	
Toluene-d8 (S)	%			99	70-130	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 1868138 1868139

Parameter	Units	40187733004 Result	MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result	MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qual
1,1,1-Trichloroethane	ug/L	<0.24	50	50	55.1	55.9	110	112	70-130	1	20	
1,1,2,2-Tetrachloroethane	ug/L	<0.28	50	50	52.3	52.4	105	105	70-130	0	20	
1,1,2-Trichloroethane	ug/L	<0.55	50	50	56.4	56.8	113	114	70-137	1	20	
1,1-Dichloroethane	ug/L	<0.27	50	50	58.7	59.6	117	119	73-153	1	20	
1,1-Dichloroethene	ug/L	<0.24	50	50	60.0	60.9	120	122	73-138	1	20	
1,2,4-Trichlorobenzene	ug/L	<0.95	50	50	51.0	51.4	102	102	70-130	1	20	
1,2-Dibromo-3-chloropropane	ug/L	<1.8	50	50	46.6	47.1	93	94	58-129	1	20	
1,2-Dibromoethane (EDB)	ug/L	<0.83	50	50	53.9	54.7	108	109	70-130	1	20	
1,2-Dichlorobenzene	ug/L	<0.71	50	50	49.6	50.2	99	100	70-130	1	20	
1,2-Dichloroethane	ug/L	<0.28	50	50	55.9	56.8	112	114	75-140	1	20	
1,2-Dichloropropane	ug/L	<0.28	50	50	55.4	56.8	111	114	71-138	3	20	
1,3-Dichlorobenzene	ug/L	<0.63	50	50	49.6	49.9	99	100	70-130	1	20	
1,4-Dichlorobenzene	ug/L	<0.94	50	50	49.7	49.9	99	100	70-130	0	20	

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REPORT OF LABORATORY ANALYSIS

Pace Analytical Services, LLC
1241 Bellevue Street - Suite 9
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(920)469-2436

QUALITY CONTROL DATA

Project: N1969A07/010 BETTER BRITE
Pace Project No.: 40187620

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 1868138 1868139

Parameter	Units	40187733004 Result	MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result	MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qual
Benzene	ug/L	<0.25	50	50	60.9	61.7	122	123	70-130	1	20	
Bromodichloromethane	ug/L	<0.36	50	50	58.6	59.6	117	119	70-130	2	20	
Bromoform	ug/L	<4.0	50	50	48.0	48.1	96	96	68-129	0	20	
Bromomethane	ug/L	<0.97	50	50	49.2	51.5	98	103	15-170	5	20	
Carbon tetrachloride	ug/L	<0.17	50	50	53.3	54.1	107	108	70-130	2	20	
Chlorobenzene	ug/L	<0.71	50	50	52.6	52.4	105	105	70-130	0	20	
Chloroethane	ug/L	<1.3	50	50	52.6	53.9	105	108	51-148	2	20	
Chloroform	ug/L	<1.3	50	50	57.1	57.9	114	116	74-136	1	20	
Chloromethane	ug/L	<2.2	50	50	37.8	38.7	76	77	23-115	2	20	
cis-1,2-Dichloroethene	ug/L	<0.27	50	50	57.0	58.2	114	116	70-131	2	20	
cis-1,3-Dichloropropene	ug/L	<3.6	50	50	51.4	52.2	103	104	70-130	2	20	
Dibromochloromethane	ug/L	<2.6	50	50	47.7	48.1	95	96	70-130	1	20	
Dichlorodifluoromethane	ug/L	<0.50	50	50	35.6	35.9	71	72	10-132	1	20	
Ethylbenzene	ug/L	<0.22	50	50	58.3	58.7	117	117	80-125	1	20	
Isopropylbenzene (Cumene)	ug/L	<0.39	50	50	58.9	59.4	118	119	70-130	1	20	
m&p-Xylene	ug/L	<0.47	100	100	117	117	117	117	70-130	0	20	
Methyl-tert-butyl ether	ug/L	<1.2	50	50	58.3	59.2	117	118	51-145	2	20	
Methylene Chloride	ug/L	<0.58	50	50	58.2	59.4	116	119	73-140	2	20	
o-Xylene	ug/L	<0.26	50	50	57.2	57.3	114	115	70-130	0	20	
Styrene	ug/L	<0.47	50	50	56.3	56.7	113	113	70-130	1	20	
Tetrachloroethene	ug/L	<0.33	50	50	55.1	55.4	110	111	70-130	0	20	
Toluene	ug/L	<0.17	50	50	56.8	57.4	114	115	80-131	1	20	
trans-1,2-Dichloroethene	ug/L	<1.1	50	50	58.8	59.6	118	119	73-148	1	20	
trans-1,3-Dichloropropene	ug/L	<4.4	50	50	49.8	49.9	100	100	70-130	0	20	
Trichloroethene	ug/L	<0.26	50	50	56.3	58.1	113	116	70-130	3	20	
Trichlorofluoromethane	ug/L	<0.21	50	50	56.4	57.6	113	115	74-147	2	20	
Vinyl chloride	ug/L	<0.17	50	50	52.0	51.6	104	103	41-129	1	20	
4-Bromofluorobenzene (S)	%						106	106	70-130			
Dibromofluoromethane (S)	%						100	100	70-130			
Toluene-d8 (S)	%						99	99	70-130			

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Green Bay, WI 54302
(920)469-2436

QUALITY CONTROL DATA

Project: N1969A07/010 BETTER BRITE
Pace Project No.: 40187620

QC Batch: 321534 Analysis Method: SM 3500-Cr B (Online)
QC Batch Method: SM 3500-Cr B (Online) Analysis Description: Chromium, Hexavalent by 3500
Associated Lab Samples: 40187620002, 40187620003, 40187620004, 40187620005

METHOD BLANK: 1867274 Matrix: Water
Associated Lab Samples: 40187620002, 40187620003, 40187620004, 40187620005

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Chromium, Hexavalent	mg/L	<0.0051	0.017	05/16/19 09:30	

LABORATORY CONTROL SAMPLE: 1867275

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Chromium, Hexavalent	mg/L	0.3	0.30	99	90-110	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 1867276 1867277

Parameter	Units	40187620002 Result	MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result	MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qual
Chromium, Hexavalent	mg/L	<0.13	7.5	7.5	7.0	7.3	93	97	90-110	4	20	

Results presented on this page are in the units indicated by the "Units" column except where an alternate unit is presented to the right of the result.

REPORT OF LABORATORY ANALYSIS

Pace Analytical Services, LLC
1241 Bellevue Street - Suite 9
Green Bay, WI 54302
(920)469-2436

QUALIFIERS

Project: N1969A07/010 BETTER BRITE
Pace Project No.: 40187620

DEFINITIONS

DF - Dilution Factor, if reported, represents the factor applied to the reported data due to dilution of the sample aliquot.

ND - Not Detected at or above LOD.

J - Estimated concentration at or above the LOD and below the LOQ.

LOD - Limit of Detection adjusted for dilution factor, percent moisture, initial weight and final volume.

LOQ - Limit of Quantitation adjusted for dilution factor, percent moisture, initial weight and final volume.

S - Surrogate

1,2-Diphenylhydrazine decomposes to and cannot be separated from Azobenzene using Method 8270. The result for each analyte is a combined concentration.

Consistent with EPA guidelines, unrounded data are displayed and have been used to calculate % recovery and RPD values.

LCS(D) - Laboratory Control Sample (Duplicate)

MS(D) - Matrix Spike (Duplicate)

DUP - Sample Duplicate

RPD - Relative Percent Difference

NC - Not Calculable.

SG - Silica Gel - Clean-Up

U - Indicates the compound was analyzed for, but not detected at or above the adjusted LOD.

N-Nitrosodiphenylamine decomposes and cannot be separated from Diphenylamine using Method 8270. The result reported for each analyte is a combined concentration.

Pace Analytical is TNI accredited. Contact your Pace PM for the current list of accredited analytes.

TNI - The NELAC Institute.

LABORATORIES

PASI-G	Pace Analytical Services - Green Bay

ANALYTE QUALIFIERS

D3	Sample was diluted due to the presence of high levels of non-target analytes or other matrix interference.

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QUALITY CONTROL DATA CROSS REFERENCE TABLE

Project: N1969A07/010 BETTER BRITE
Pace Project No.: 40187620

Lab ID	Sample ID	QC Batch Method	QC Batch	Analytical Method	Analytical Batch
40187620001	**TRIP BLANK**	EPA 8260	321680		
40187620005	**MW-116**	EPA 8260	321680		
40187620002	**MW-111**	SM 3500-Cr B (Online)	321534		
40187620003	**MW-115**	SM 3500-Cr B (Online)	321534		
40187620004	**MW-115A**	SM 3500-Cr B (Online)	321534		
40187620005	**MW-116**	SM 3500-Cr B (Online)	321534		

UPPER MIDWEST REGION
MN: 612-607-1700 WI: 920-469-2436

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40187620

Pace Analytical®
www.pacelabs.com

CHAIN OF CUSTODY

*Preservation Codes
A=None B=HCL C=H2SO4 D=HNO3 E=DI Water F=Methanol G=NaOH
H=Sodium Bisulfate Solution I=Sodium Thiosulfate J=Other

(Please Print Clearly)	
Company Name:	OMNNI Associates
Branch/Location:	Appleton
Project Contact:	Kim Kennedy
Phone:	920.830.6174
Project Number:	N1969A07/010
Project Name:	Better Brite
Project State:	WI
Sampled By (Print):	Kim Kennedy
Sampled By (Sign):	KK
PO #:	Regulatory Program:

Quote #:	
Mail To Contact:	Kim Kennedy
Mail To Company:	OMNNI Associates
Mail To Address:	One Systems Drive Appleton WI 54914
Invoice To Contact:	
Invoice To Company:	SAME
Invoice To Address:	kkennedy@omnni.com
Invoice To Phone:	920.735.6900

Data Package Options (billable)
☐ EPA Level III
☐ EPA Level IV

MS/MSD
☐ On your sample (billable)
☐ NOT needed on your sample

Matrix Codes
A = Air W = Water
B = Biota DW = Drinking Water
C = Charcoal GW = Ground Water
O = Oil SW = Surface Water
S = Soil WW = Waste Water
SI = Sludge WP = Wipe

PACE LAB #	CLIENT FIELD ID	COLLECTION DATE	COLLECTION TIME	MATRIX	Analyses Requested: Hexavalent Chromium	VOC	CLIENT COMMENTS	LAB COMMENTS (Lab Use Only)	Profile #
	FILTERED? (YES/NO)				Y/N: N	N			
	PRESERVATION (CODE)*				Pick Letter: A	B			
001	Trip Blank	LAB PROVIDED		GW		X			
002	MW-111	5-15	1052		X				
003	MW-115 (KK)		1136		X				
004	MW-115A		1132		X				
005	MW-116		1027		X	X			

JV

Rush Turnaround Time Requested - Prelims
(Rush TAT subject to approval/surcharge)
Date Needed:

Transmit Prelim Rush Results by (complete what you want):

Email #1:	
Email #2:	
Telephone:	
Fax:	

Samples on HOLD are subject to special pricing and release of liability

Relinquished By:	Date/Time:	Received By:	Date/Time:
KK	5-15-19 1232		05/15/19 1232

PACE Project No. 40187620

Receipt Temp = R01 °C

Sample Receipt pH OK / Adjusted

Cooler Custody Seal Present / Not Present Intact / Not Intact

C019a(27Jun2006)

Version 6.0 06/14/06

ORIGINAL

Pace Analytical Services, LLC
1241 Bellevue Street, Suite 9
Green Bay, WI 54302

Sample Preservation Receipt Form

Client Name: Omni Project # 40187620

All containers needing preservation have been checked and noted below: □Yes □No ☒N/A Initial when completed: Date/ Time:

Lab Lot# of pH paper: Lab Std #ID of preservation (if pH adjusted):

	Glass							Plastic							Vials						Jars			General							
Pace Lab #	AG1U	AG1H	AG4S	AG4U	AG5U	AG2S	BG3U	BP1U	BP2N	BP2Z	BP3U	BP3B	BP3N	BP3S	DG9A	DG9T	VG9U	VG9H	VG9M	VG9D	JGFU	WGFU	WPFU	SP5T	ZPLC	GN	VOA Vials (>6mm) *	H2SO4 pH ≤2	NaOH+Zn Act pH ≥9	NaOH pH ≥12	HNO3 pH ≤2	pH after adjusted	Volume (mL)
001																		2									1						2.5 / 5 / 10
002											1																						2.5 / 5 / 10
003											1																						2.5 / 5 / 10
004											1																						2.5 / 5 / 10
005											1							3															2.5 / 5 / 10
006																		3	5/15/19														2.5 / 5 / 10
007																																	2.5 / 5 / 10
008																																	2.5 / 5 / 10
009																																	2.5 / 5 / 10
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018																																	2.5 / 5 / 10
019																																	2.5 / 5 / 10
020																																	2.5 / 5 / 10

Exceptions to preservation check: VOA, Coliform, TOC, TOX, TOH, O&G, WI DRO, Phenolics, Other: _____ Headspace in VOA Vials (>6mm): ☒Yes □No □N/A ***If yes look in headspace column**

AG1U	1 liter amber glass	BP1U	1 liter plastic unpres	DG9A	40 mL amber ascorbic	JGFU	4 oz amber jar unpres
AG1H	1 liter amber glass HCL	BP2N	500 mL plastic HNO3	DG9T	40 mL amber Na Thio	WGFU	4 oz clear jar unpres
AG4S	125 mL amber glass H2SO4	BP2Z	500 mL plastic NaOH, Znact	VG9U	40 mL clear vial unpres	WPFU	4 oz plastic jar unpres
AG4U	120 mL amber glass unpres	BP3U	250 mL plastic unpres	VG9H	40 mL clear vial HCL		
AG5U	100 mL amber glass unpres	BP3B	250 mL plastic NaOH	VG9M	40 mL clear vial MeOH	SP5T	120 mL plastic Na Thiosulfate
AG2S	500 mL amber glass H2SO4	BP3N	250 mL plastic HNO3	VG9D	40 mL clear vial DI	ZPLC	ziploc bag
BG3U	250 mL clear glass unpres	BP3S	250 mL plastic H2SO4			GN:	

Pace Analytical™ 1241 Bellevue Street, Green Bay, WI 54302	Document Name: Sample Condition Upon Receipt (SCUR)	Document Revised: 25Apr2018
	Document No.: F-GB-C-031-Rev.07	Issuing Authority: Pace Green Bay Quality Office

Sample Condition Upon Receipt Form (SCUR)

Project #: WO#: 40187620

40187620

Client Name: Omni

Courier: ☐ CS Logistics ☐ Fed Ex ☐ Speedee ☐ UPS ☐ Waltco
☑ Client ☐ Pace Other: _____

Tracking #: _____

Custody Seal on Cooler/Box Present: ☐ yes ☑ no Seals intact: ☐ yes ☐ no

Custody Seal on Samples Present: ☐ yes ☑ no Seals intact: ☐ yes ☐ no

Packing Material: ☐ Bubble Wrap ☑ Bubble Bags ☐ None ☐ Other _____

Thermometer Used SR - NA **Type of Ice:** (Wet) Blue Dry None ☑ Samples on ice, cooling process has begun

Cooler Temperature Uncorr: /Corr: R01

Temp Blank Present: ☐ yes ☐ no **Biological Tissue is Frozen:** ☐ yes ☐ no

Temp should be above freezing to 6°C.
Biota Samples may be received at ≤ 0°C.

Person examining contents:
Date: 5/15/19
Initials: DS

Chain of Custody Present:	☑Yes ☐No ☐N/A	1.
Chain of Custody Filled Out:	☑Yes ☐No ☐N/A	2.
Chain of Custody Relinquished:	☑Yes ☐No ☐N/A	3.
Sampler Name & Signature on COC:	☑Yes ☐No ☐N/A	4.
Samples Arrived within Hold Time:	☑Yes ☐No	5.
- VOA Samples frozen upon receipt	☐Yes ☐No	Date/Time:
Short Hold Time Analysis (<72hr):	☑Yes ☐No	6.
Rush Turn Around Time Requested:	☐Yes ☑No	7.
Sufficient Volume: For Analysis: ☑Yes ☐No MS/MSD: ☐Yes ☑No ☐N/A		8.
Correct Containers Used:	☑Yes ☐No	9.
-Pace Containers Used:	☑Yes ☐No ☐N/A	
-Pace IR Containers Used:	☐Yes ☐No ☑N/A	
Containers Intact:	☑Yes ☐No	10.
Filtered volume received for Dissolved tests	☐Yes ☐No ☑N/A	11.
Sample Labels match COC:	☐Yes ☑No ☐N/A	12. no times DS 5/15/19
-Includes date/time/ID/Analysis Matrix: WV		
Trip Blank Present:	☑Yes ☐No ☐N/A	13.
Trip Blank Custody Seals Present	☑Yes ☐No ☐N/A	
Pace Trip Blank Lot # (if purchased): 423		

Client Notification/ Resolution: If checked, see attached form for additional comments ☐

Person Contacted: _____ Date/Time: _____

Comments/ Resolution: _____

Project Manager Review: _____ **Date:** 5/15/19