

## Source Property Information

**BRRTS #:**  (No Dashes)

**ACTIVITY NAME:**

**PROPERTY ADDRESS:**

**MUNICIPALITY:**

**PARCEL ID #:**

**CLOSURE DATE:**

**FID #:**

**DATCP #:**

**PECFA#:**

**\*WTM COORDINATES:**

X:  Y:

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

**WTM COORDINATES REPRESENT:**

- Approximate Center Of Contaminant Source
- Approximate Source Parcel Center

**Please check as appropriate:** (BRRTS Action Code)

### Contaminated Media:

- |  |  |
|--|--|
| <input checked="" type="checkbox"/> Groundwater Contamination > ES (236)                     | <input checked="" type="checkbox"/> Soil Contamination > *RCL or **SSRCL (232)               |
| <input checked="" type="checkbox"/> Contamination in ROW                                     | <input type="checkbox"/> Contamination in ROW  |
| <input checked="" type="checkbox"/> Off-Source Contamination                                 | <input type="checkbox"/> Off-Source Contamination  |
| <i>(note: for list of off-source properties<br/>see "Impacted Off-Source Property" form)</i> | <i>(note: for list of off-source properties<br/>see "Impacted Off-Source Property" form)</i> |

### Continuing Obligations:

- |   |  |
|---|--|
| <input type="checkbox"/> N/A (Not Applicable)   | <input checked="" type="checkbox"/> Cover or Barrier (222)   |
| <input type="checkbox"/> Soil: maintain industrial zoning (220)                                   | <i>(note: maintenance plan for<br/>groundwater or direct contact)</i>  |
| <i>(note: soil contamination concentrations<br/>between non-industrial and industrial levels)</i> | <input checked="" type="checkbox"/> Vapor Mitigation (226)   |
| <input type="checkbox"/> Structural Impediment (224)  | <input type="checkbox"/> Maintain Liability Exemption (230)  |
| <input type="checkbox"/> Site Specific Condition (228)  | <i>(note: local government unit or economic<br/>development corporation was directed to<br/>take a response action )</i> |

**Note:** Comments will not print out.

### Monitoring Wells:

Are all monitoring wells properly abandoned per NR 141? (234)

- Yes     No     N/A

*\* Residual Contaminant Level  
\*\*Site Specific Residual Contaminant Level*



June 4, 2013

VPLE BRRTS # 06-36-551669

Mr. Paul A. Ahearn  
paul.ahearn@invensys.com  
Invensys, Inc.  
33 Commercial Street, B51-2J  
Foxboro, MA 02035

Rabbi Yitzchok Wolf  
rabbiwolf@clhds.com  
SJ Abrams Cheder Lubavitch Hebrew Day School  
5201 Howard Street  
Skokie, Illinois 60077

**KEEP THIS DOCUMENT WITH YOUR PROPERTY RECORDS**

**SUBJECT:** Final Case Closure with Continuing Obligations  
Paragon Electric Co Inc., 606 Parkway Blvd, Two Rivers, Wisconsin  
WDNR BRRTS Activity #: 02-36-000153  
Parcel Tax # 053-211-102-001.08

Dear Mr. Ahearn and Rabbi Wolf:

The Wisconsin Department of Natural Resources (WDNR) considers the Paragon Electric Co Inc. site closed, with continuing obligations. No further investigation or remediation is required at this time. However, current and future property owners must comply with the continuing obligations as explained in the *conditions of closure* in this letter. Please read over this letter closely to ensure that current and future property owners comply with all conditions and other on-going requirements. Provide this letter and any attached maintenance plan to anyone who purchases this property.

This final closure decision is based on the correspondence and data provided to WDNR, and is issued under ch. NR 726, Wisconsin Administrative Code. The Northeast Region (NER) Closure Committee reviewed the request for closure on April 11, 2013. The NER Closure Committee reviews environmental remediation cases for compliance with state laws and standards to maintain consistency in the closure of these cases. A conditional closure letter was issued by WDNR on April 11, 2013, and documentation that the conditions in that letter were met was received on June 4, 2013.

**Background**

The Paragon Electric Co Inc. ("Paragon") site has a long history that began in the late 1980s with the WDNR Remediation and Redevelopment program. In 1989, EPA notified WDNR of spill incidents at Paragon in 1983 and 1984. In 1989 and 1990, Paragon excavated and closed four former underground storage tanks (12,000 gallon fuel oil; 2,000 gallon and 550 gallon cutting oil; and 550 gallon mineral spirits) and no additional actions were required to address those tanks at that time. However, during that environmental work, the presence of trichloroethylene (TCE) contamination in soil and groundwater was a consistent occurrence, therefore, in early 1991, the Department assigned case # 02-36-000153 to the TCE contamination at the property.

Over the course of the last 20+ years numerous site investigations were completed to address the TCE groundwater plume on and off the property. The subsurface at the site consists of a fine to medium poorly graded sand with a clay layer at 40 feet, followed by another 15 feet of sand. Groundwater at the site moves rather rapidly toward Lake Michigan which is located about 400 feet south of the site.

In 1992, a combined soil vapor and groundwater cleanup was started at the contaminant source below the building. In the mid 1990s, several other groundwater extraction wells were added and installed outside of the building to continue withdrawal of contaminated groundwater that had moved away from the source. The extracted groundwater was aerated in an underground chamber and then discharged into the City of Two Rivers sanitary sewer. The active source remedy resulted in the extraction of over 120 gallons of TCE contaminated groundwater. Additional water table monitoring wells and piezometers were installed on and off the property and the groundwater was monitored for many years. The groundwater contamination case was conditionally closed in September 2006.

In June 2008, in lieu of accepting the conditional closure decision, the responsible party, Invensys, chose to enter the property into the Voluntary Party Liability Exemption (VPLE) process. Subsequently under the VPLE process, Phase I and Phase II investigations (additional soil, vapor, and groundwater sampling) were undertaken. Additional cleanup activities included extraction of soil vapors in portions of the east half of the building and disposal of an underground vessel were completed. The soil vapor extraction remedy resulted in a ~95% reduction in vapors beneath the building and an additional 18 gallons of TCE were removed from the subsurface. All remediation system components have been decommissioned and all monitoring wells have been filled and sealed.

As part of this closure for case #02-36-000153, the following two historic spills at the facility are also be closed on the WDNR database: 1) BRRTS #04-36-039873 – August 6, 1984, Pumping hose failure, 2) BRRTS# 04-36-045266 –November 20, 1990, 70 gallon spill from faulty valve.

#### Continuing Obligations

The conditions of closure and continuing obligations required were based on the property being used for **Industrial purposes**. The continuing obligations for this site are summarized below. Further details on actions required are found in the section titled *Closure Conditions*.

- Groundwater contamination is present above ch. NR 140, Wis. Adm. Code enforcement standards.
- Residual soil contamination exists that must be properly managed should it be excavated or removed.
- The concrete floor slab in certain parts of the facility must be maintained over contaminated soil and the WDNR must approve any changes to this barrier.
- Site-specific exposure assumptions were used. Current land or property use must be maintained to be protective. If changes to the current property use or land use are planned, an assessment must be made of whether the closure is still protective.
- Remaining soil contamination could result in vapor intrusion if future construction activities occur. If new building construction is planned, vapor control technologies will be required for occupied buildings, unless the property owner assesses the potential for vapor intrusion, and the WDNR agrees that conditions are protective of the new use.

The following WDNR fact sheet, “Continuing Obligations for Environmental Protection”, RR-819, was included with this letter, to help explain a property owner’s responsibility for continuing obligations on their property. If the fact sheet is lost, you may obtain a copy at <http://DNR.wi.gov/files/PDF/pubs/rr/RR819.pdf>.

#### GIS Registry

This site will be listed on the Remediation and Redevelopment Program’s internet accessible Geographic Information System (GIS) Registry, to provide notice of residual contamination and of any continuing obligations.

WDNR approval prior to well construction or reconstruction is required for all sites shown on the GIS Registry, in accordance with s. NR 812.09(4) (w), Wis. Adm. Code. To obtain approval, complete and submit Form 3300-254 to the WDNR Drinking and Groundwater program's regional water supply specialist. This form can be obtained on-line at <http://DNR.wi.gov/topic/wells/documents/3300254.pdf> or at the web address listed below for the GIS Registry.

All site information is also on file at the Northeast Regional WDNR office, at 2984 Shawano Avenue, Green Bay, WI 54313-6727. This letter and information that was submitted with your closure request application, including the maintenance plan, will be included on the GIS Registry in a PDF attachment. To review the site on the GIS Registry web page, visit the RR Sites Map page at <http://dnrmaps.wi.gov/imf/imf.jsp?site=brrts2>.

#### Prohibited Activities

Certain activities are prohibited at closed sites because maintenance of a cover barrier is intended to prevent contact with any remaining contamination. When a barrier is required, the condition of closure requires notification of the WDNR before making a change, in order to determine if further action is needed to maintain the protectiveness of the remedy employed. The following activities are prohibited on any portion of the property where the concrete floor slab is required, as shown on the attached **Exhibit A (Location Map)**, unless prior written approval has been obtained from the WDNR:

- removal of the existing barrier;
- replacement with another barrier;
- excavating or grading of the land surface;
- filling on covered or paved areas;
- plowing for agricultural cultivation;
- construction or placement of a building or other structure;
- changing the use or occupancy of the property to a residential exposure setting, which may include certain uses, such as single or multiple family residences, a school, day care, senior center, hospital, or similar residential exposure settings.

#### Closure Conditions

Compliance with the requirements of this letter is a responsibility to which the current property owner and any subsequent property owners must adhere. WDNR staff will conduct periodic prearranged inspections to ensure that the conditions included in this letter and the attached maintenance plans are met. If these requirements are not followed, the WDNR may take enforcement action under s. 292.11, Wisconsin Statutes to ensure compliance with the specified requirements, limitations or other conditions related to the property.

#### Residual Groundwater Contamination (ch. NR 140, 812, Wis. Adm. Code)

Groundwater contamination greater than enforcement standards is present both on this contaminated property and off this contaminated property, as shown on the attached **Figure B.3.b (Groundwater Isoconcentration Map)**. Affected property owners were notified of the presence of groundwater contamination. If you intend to construct a new well, or reconstruct an existing well, you will need prior WDNR approval.

#### Residual Soil Contamination (ch. NR 718, chs. 500 to 536, Wis. Adm. Code or ch. 289, Wis. Stats.)

Soil contamination remains under the concrete floor slab in limited areas below the storage area, press room, and paint area as indicated on the attached **Exhibit A (Location Map)**. If soil in the specific locations described

above is excavated in the future, the property owner at the time of excavation must sample and analyze the excavated soil to determine if contamination remains. If sampling confirms that contamination is present, the property owner at the time of excavation will need to determine whether the material is considered solid or hazardous waste and ensure that any storage, treatment or disposal is in compliance with applicable standards and rules. In addition, all current and future owners and occupants of the property need to be aware that excavation of the contaminated soil may pose an inhalation or other direct contact hazard and as a result special precautions may need to be taken to prevent a direct contact health threat to humans.

Cover or Barrier (s. 292.12 (2) (a), Wis. Stats.)

The concrete floor slab that exists in the location shown on **Exhibit A (Location Map)** shall be maintained in compliance with **Attachment D: Cover Barrier Maintenance Plan** in order to minimize the infiltration of water and prevent additional groundwater contamination that would violate the groundwater quality standards in ch. NR 140, Wis. Adm. Code.

A cover or barrier for industrial land uses, or certain types of commercial land uses may not be protective if use of the property were to change such that a residential exposure would apply. This may include, but is not limited to single or multiple family residences, a school, day care, senior center, hospital or similar settings. Before using the property for such purposes, you must notify the WDNR to determine if additional response actions are warranted. A request may be made to modify or replace a cover or barrier. The replacement or modified cover or barrier must be protective of the revised use of the property, and must be approved in writing by the WDNR prior to implementation.

**Attachment D: Cover Barrier Maintenance Plan and Inspection Log** are to be kept up-to-date and on-site. The inspection log should not be submitted to WDNR unless requested

This property may not be used or developed for a residential, commercial, agricultural or other non-industrial use, unless prior written approval has been obtained from the WDNR. An investigation and remedial action to meet applicable soil cleanup standards may be required at that time.

Vapor Mitigation or Evaluation (s. 292.12 (2), Wis. Stats.)

Vapor intrusion is the movement of vapors coming from volatile chemicals in the soil or groundwater, into buildings where people may breathe air contaminated by the vapors. Vapor mitigation systems are used to interrupt the pathway, thereby reducing or preventing vapors from moving into the building.

Soil vapor beneath the storage area, press room, and paint area of the Paragon Electric building as shown in Exhibit A (Location Map) contain chlorinated solvent vapors at levels that would pose a long-term risk to human health, if allowed to migrate into an occupied building. Case closure was based on the property being used for industrial purposes and currently contains a vacant industrial building. Therefore, use of this property is restricted to the following uses: industrial or manufacturing. If changes in property or land use are planned, the property owner must notify the WDNR and assess whether the closure is still protective. Additional response actions may be necessary.

In addition, before a new building is constructed over vapor contaminated soil, the property owner must notify the WDNR. Vapor control technologies are required for construction of occupied buildings unless the property owner assesses the vapor pathway and WDNR concurs that property conditions are protective of the new use.

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

#### General Wastewater Permits for Construction Related Dewatering Activities

The WDNR's Water Quality Program regulates point source discharges of contaminated water, including discharges to surface waters, storm sewers, pits, or to the ground surface. This includes discharges from construction related dewatering activities, including utility and building construction.

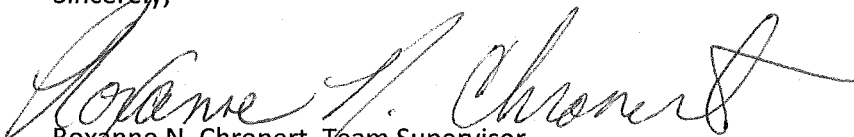
If you or any other person plan to conduct such activities, you or that person must contact that program, and if necessary, apply for the necessary discharge permit. Additional information regarding discharge permits is available at <http://DNR.wi.gov/topic/wastewater/GeneralPermits.html>. If residual soil or groundwater contamination is likely to affect water collected in a pit/trench that requires dewatering, a general permit for Discharge of Contaminated Groundwater from Remedial Action Operations may be needed. If water collecting in a pit/trench that requires dewatering is expected to be free of pollutants other than suspended solids and oil and grease, a general permit for Pit/Trench Dewatering may be needed.

#### Post Closure Notification Requirements

Please send written notifications in accordance with the above requirements to the Northeast Regional office in Green Bay, to the attention of the Environmental Program Associate.

We appreciate the efforts of Invensys to restore the environment at this site and enroll the property in the Voluntary Party Liability Exemption (VPLE) process. We will be issuing Invensys a final invoice for WNDR oversight fees under the VPLE process; we received the environmental insurance fee paid by Invensys on April 2, 2013. The Certificate of Completion will be issued upon payment of the final invoice. If you have any questions regarding this closure decision or anything outlined in this letter, please contact Annette Weissbach at 920-662-5165.

Sincerely,

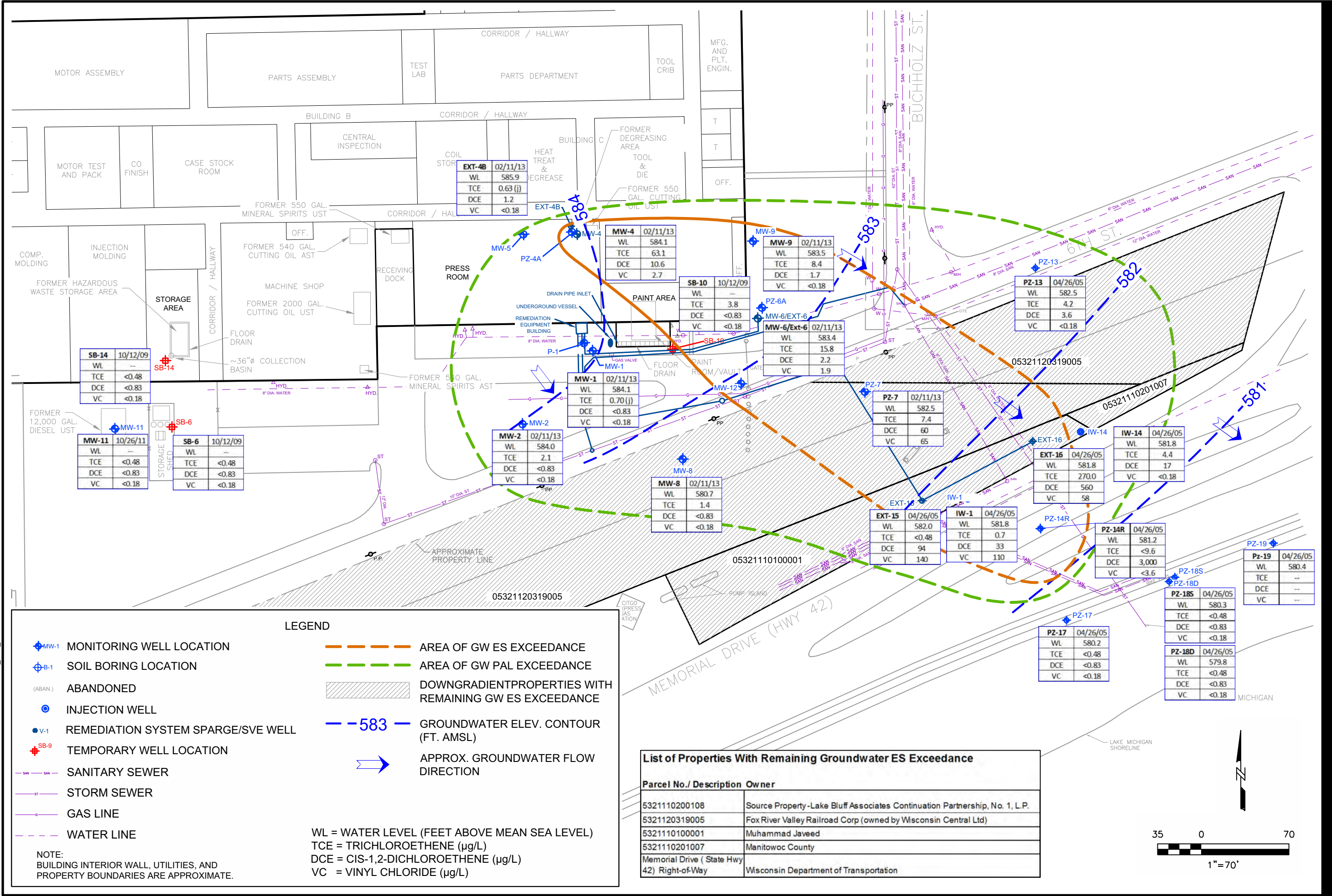


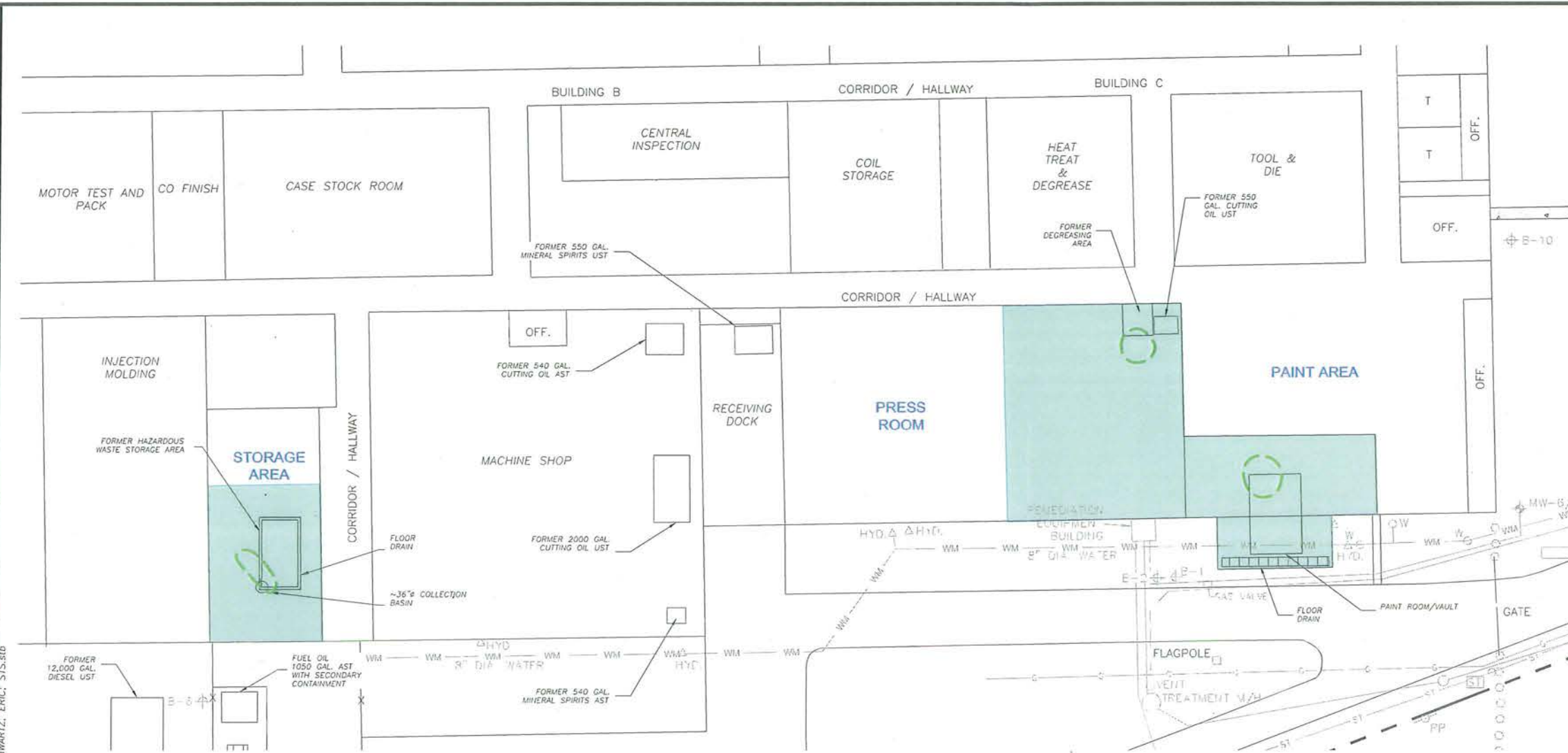
Roxanne N. Chronert, Team Supervisor  
Northeast Remediation & Redevelopment Program

#### Attachments:

- Groundwater Isoconcentration Map (Figure B.3.b)
- Remaining Soil Contamination Map (Exhibit A – Location Map)
- Cover Barrier Maintenance Plan (Attachment D)
- Publication RR-819 Continuing Obligations Factsheet

cc: Vasanta Kalluri – AECOM





**LEGEND**

- SSW — SANITARY SEWER
- ST — STORM SEWER
- G — GAS LINE
- WM — WATER LINE
- APPROX. EXTENT OF REMAINING SOIL EXCEEDING SOIL-TO-GROUNDWATER LEACHING PATHWAY
- AREA OF FLOOR MAINTENANCE (ENGINEERED BARRIER FOR GROUNDWATER INFILTRATION)

**NOTE:**  
 BUILDING INTERIOR WALL, UTILITIES, AND PROPERTY BOUNDARIES ARE APPROXIMATE.



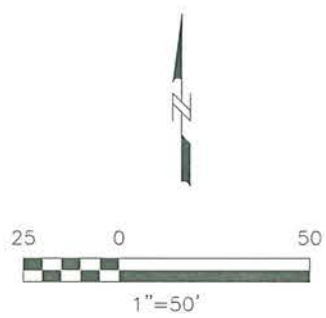
STORAGE ROOM



PRESS ROOM



PAINT ROOM





## **ATTACHMENT D : Cover Barrier Maintenance Plan**

Paragon Electric Site, Two Rivers, Wisconsin  
WDNR BRRTS No. 02-36-000153

### **PROPERTY LOCATED AT:**

606 Parkway Boulevard, Two Rivers, Wisconsin (the "Property")

**PROPERTY LEGAL DESCRIPTION:** NW 1/4 NE 1/4 & NE 1/4 NE 1/2 OF S11 T19N R24E PT OF SUB GOVT LOT 1 LYING N OF C & N W RR ROW ALSO SW 1/4 SE 1/4 S2 T19N R24E TRACTS REC IN V 256 P 261 & V 499 P 327 OF DEEDS ALSO THIEDE & GOELE D ALL OF BLK 3 & VAC STREET IN V 249 P 197 OF DEEDS

**PARCEL TAX #:** 053-211-102-001.08

### **Introduction**

The Wisconsin Department of Natural Resources ("DNR") has approved closure of the remedial project at the Property to industrial standards with, which is often the case in industrial remediation projects, the installation and maintenance of a cover barrier over three limited locations in the building located at the Property. This document constitutes the Maintenance Plan required by s. NR 724.13(2), Wisconsin Administrative Code for the cover barrier at the Property, which will consist of the concrete floor of the Property's existing building.

More site-specific information about this Property may be found in: (i) the case file in the DNR Northeast regional office; (ii) BRRTS on the Web (DNR's internet based data base of contaminated sites): <http://dnr.wi.gov/botw/SetUpBasicSearchForm.do> (iii) GIS Registry PDF file for further information on the nature and extent of contamination: <http://dnrmaps.wisconsin.gov/imf/imf.jsp?site=brrts2>; and (iv) the DNR project manager for Manitowoc County.

### **Soil Description**

Residual low level impacts of trichloroethene and tetrachloroethene (chlorinated solvents) are located at a depth of 0 to 6 feet in the soil in several places at the Property, as shown on the attached Exhibit A (Figure D.1). DNR desires to minimize the soil-to-groundwater leaching of these solvents through the maintenance of a cover barrier, and has acknowledged that such soil may remain in place provided that a cover barrier, such as the concrete slab of the Property's existing building, is maintained.

### **Description of the Cover Barrier and Maintenance Activities**

The cover barrier consists of the approximately 6-inch thick concrete floor slab in the Property's existing building. The areas of the cover barrier to be maintained are in the southeast portion of the building, specifically in the Storage, Press, and Paint areas, as shown in Exhibit A (the "Designated Areas"). The cover barrier over the Designated Areas will be inspected by the owner or its designated representative once a year for deterioration, cracks and other potential problems that may result in leaching of the solvents noted above into underlying groundwater. Any needed repairs to the said cover barrier will be promptly scheduled and completed by the owner. A log of the inspections and any repairs and recommendations will be maintained by the owner at the Property and is included as Exhibit B, Cap Inspection Log. The inspection log will be available for submittal to or inspection by DNR representatives upon their request.] Any soil that is excavated from the Designated Areas must be tested, treated, and disposed of by the owner in accordance with applicable law. If any portion of the cover barrier overlying any portion of the Designated Areas is removed or replaced, the replacement barrier must be equally impervious and subject to the same maintenance and inspection guidelines outlined in this

Maintenance Plan (unless indicated otherwise by the DNR or its successor). The owner will maintain a copy of this Maintenance Plan at the Property and make it available to all interested parties (i.e. on-site employees, contractors, future owners, etc.). This Maintenance Plan can be amended or withdrawn by the owner and its successors with the written approval of WDNR.

Notwithstanding the above, the owner will not modify the cover barrier over the Designated Areas in a manner that will adversely affect the soil-to-groundwater leaching pathway of the above cited solvents unless prior written approval has been obtained from the DNR.

### **Contact Information**

#### Responsible Party:

Mr. Paul A. Ahearn  
Ranco Incorporated of Delaware c/o Invensys Inc.  
33 Commercial Street, B51-2J  
Foxboro, Massachusetts 02035  
Phone: (508) 549-4949

#### Owner:

Lake Bluff Associates Continuation Partnership, No. 1, L.P.  
c/o Rabbi Yitzchok Wolf  
SJ Abrams Cheder Lubavitch Hebrew Day School  
Central Office  
5201 Howard Street  
Skokie, Illinois 60077  
Phone: 847-675-6777

#### Consultant:

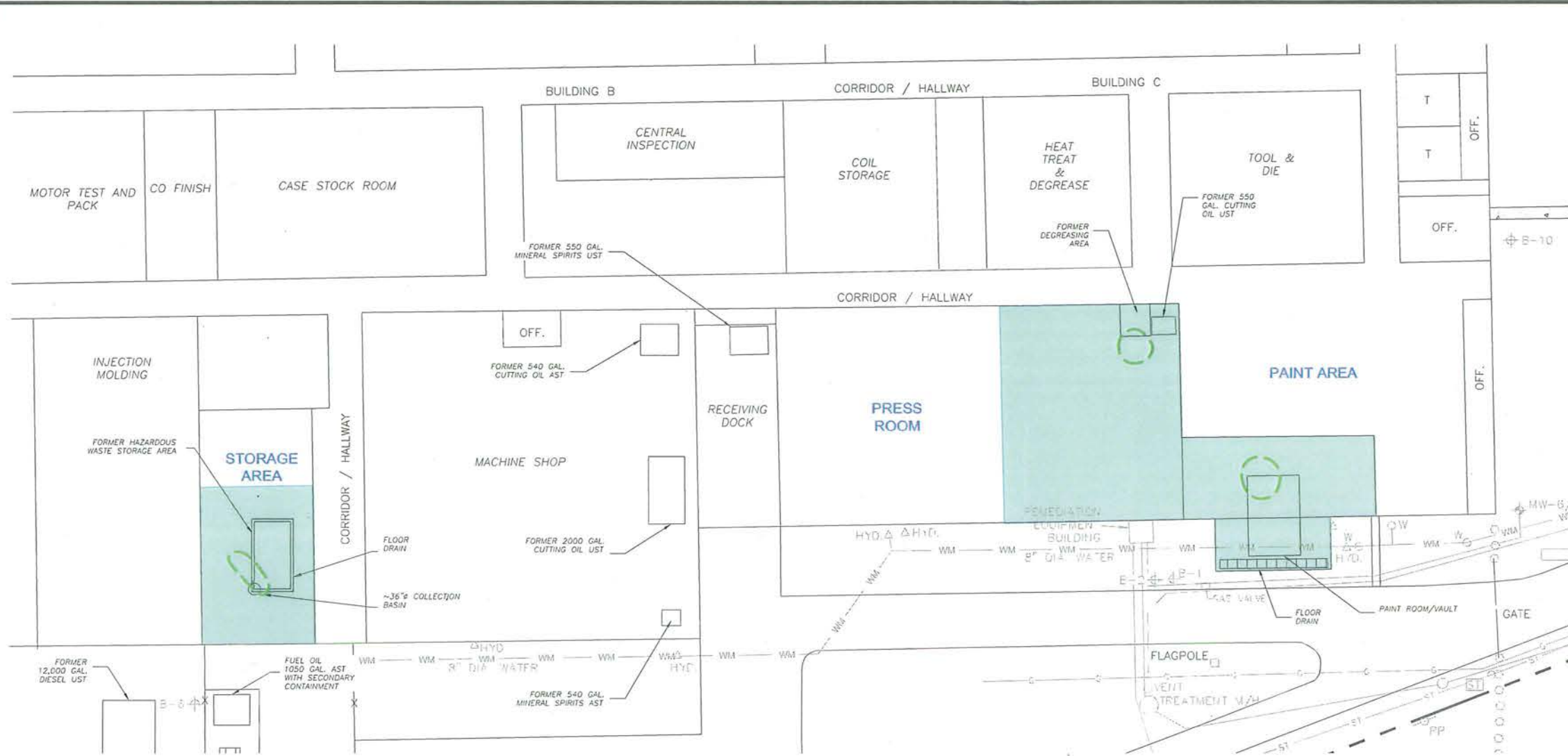
Mr. Mark W. Magee  
AECOM  
1035 Kepler Drive  
Green Bay, Wisconsin 54311  
Phone: (920) 406-3141

Or

Ms. Vasanta M. Kalluri  
AECOM  
717, 17<sup>th</sup> Street, Suite 2600  
Denver, Colorado 80202  
Phone: (303) 228-3058

#### DNR:

Ms. Annette Weissbach  
Wisconsin Department of Natural Resources  
2984 Shawano Avenue  
Green Bay, Wisconsin 54307-0448  
Phone: (920) 662-5165



**LEGEND**

- SAH — SANITARY SEWER
- ST — STORM SEWER
- G — GAS LINE
- WM — WATER LINE
- APPROX. EXTENT OF REMAINING SOIL EXCEEDING SOIL-TO-GROUNDWATER LEACHING PATHWAY
- AREA OF FLOOR MAINTENANCE (ENGINEERED BARRIER FOR GROUNDWATER INFILTRATION)

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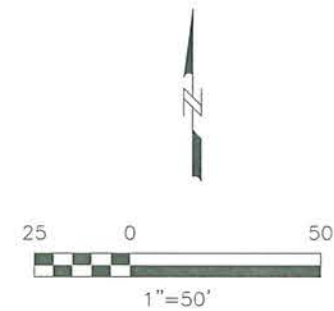
STORAGE ROOM



PRESS ROOM



PAINT ROOM



**Exhibit B**  
**Cover Barrier Inspection Log**  
**Former Paragon Electric Facility**  
**Two Rivers, Wisconsin**  
**WDNR BRRTS No. 02-36-000153**

Inspection Date	Inspector	Condition of Cover Barrier	Recommendations	Have recommendations from previous inspection been implemented



April 11, 2013

VPLE BRRTS # 06-36-551669

Mr. Paul A. Ahearn  
paul.ahearn@invensys.com  
Invensys, Inc.  
33 Commercial Street, B51-2J  
Foxboro, MA 02035

Rabbi Yitzchok Wolf  
rabbiwolf@clhds.com  
SJ Abrams Cheder Lubavitch Hebrew Day School  
5201 Howard Street  
Skokie, Illinois 60077

Subject: **Conditional Closure Decision**  
with Requirements to achieve Final Closure  
Paragon Electric Co Inc., 606 Parkway Blvd, Two Rivers, Wisconsin  
BRRTS case # 02-36-000153

Dear Mr. Ahearn and Rabbi Wolf,

On April 11, 2013, the Department of Natural Resources, (the "Department") Northeast Region Closure Committee (the "Committee") reviewed your request for closure of the case described above. The case was initially reviewed and approved for conditional closure in 2006, however, additional investigation and remediation has occurred since then. This April 11, 2013 conditional closure decision includes an evaluation of all site data and replaces the conditional closure letter dated September 27, 2006. The Committee reviews environmental remediation cases for compliance with state rules and statutes to maintain consistency in the closure of these cases. After careful review of the closure request, the Committee has determined that the chlorinated solvent contamination on the property appears to have been investigated and remediated to the extent practicable under site conditions.

Previously, on January 3, 2008, upon request by Invensys, the Department issued a *Technical Assistance Clarification for Meeting Three Possible Closure Scenarios*, in lieu of accepting the September 2006 conditional closure decision. Invensys chose to enter the property into the Voluntary Party Liability Exemption (VPLE) process and as a result the Department approved the property to proceed in the VPLE process in June 6, 2008, to address the remainder of the industrial portions of the property. Since that time Phase I and Phase II investigations, remediation of soil vapors, and disposal of an underground vessel have been completed.

The Paragon Electric Co Inc. case has been remediated to Department standards in accordance with s. NR 726.05, Wis. Adm. Code and will be closed if the following condition is satisfied:

#### **MONITORING WELL ABANDONMENT**

All remaining monitoring wells must be properly abandoned in accordance with ch. NR 141, Wis. Adm. Code. Documentation of well abandonment must be submitted to me on Form 3300-005, found at <http://dnr.wi.gov/topic/DrinkingWater/documents/forms/3300005.pdf> or provided by the Department of Natural Resources.

### CONTINUING OBLIGATIONS AND RESPONSIBILITIES

As part of the approval of the closure of this case, the property owner will be responsible for maintaining the following continuing obligations:

- Groundwater contamination is present above ch. NR 140, Wis. Adm. Code enforcement standards.
- Residual soil contamination exists that must be properly managed should it be excavated or removed.
- The concrete floor slab must be maintained over residual contaminated soil in certain parts of the building and the DNR must approve any changes to this barrier.
- Site-specific exposure assumptions were used. Current land or property use must be maintained to be protective. If changes to the current property use or land use are planned, an assessment must be made of whether the closure is still protective.
- Remaining soil contamination could result in vapor intrusion if future construction activities occur. If new building construction is planned, vapor control technologies will be required for occupied buildings, unless the property owner assesses the potential for vapor intrusion, and the DNR agrees that conditions are protective of the new use.

**A final, detailed closure letter will be issued after the monitoring well abandonment forms are received. Furthermore, since the property is enrolled in the VPLE Process, a Certificate of Completion (COC) will also be issued when all Closure and GIS Registry documentation is completed.** The closure of the chlorinated solvent groundwater contamination is relying on natural attenuation to eventually restore groundwater quality to meet ch. NR 140 Wisconsin Administrative Code Enforcement Standards. Because the case is being closed prior to meeting standards, Invensys has paid an environmental insurance fee which was received by the Department on April 1, 2013. This insurance fee is in addition to the required VPLE oversight fees. Invensys will be receiving a final invoice for oversight costs within the next 60 days.

We appreciate your efforts to restore the environment at this site. If you have any questions regarding this letter, please contact me at (920)662-5165 or [Annette.weissbach@wisconsin.gov](mailto:Annette.weissbach@wisconsin.gov).

Sincerely,



Annette Weissbach  
Hydrogeologist  
Remediation & Redevelopment Program

e-cc: Vasanta Kalluri – AECOM  
Michael Prager – RR/5

**BRRTS #:** 02-36-000153

**FID #:** 436042310

**SITE NAME:** PARAGON ELECTRIC CO INC

### **Associated VPLE Site**

To view the Certificate of Completion (COC) for this site click on the link below:

**BRRTS #**

**SITE NAME**

06-36-551669

[PARAGON ELECTRIC CO INC \(FORMER\) \(VPLE\)](#)

**SUBMIT AS UNBOUND PACKAGE IN THE ORDER SHOWN**

**Notice:** Pursuant to ch. 292, Wis. Stats., and chs. NR 726 and 746, Wis. Adm. Code, this form is required to be completed for case closure requests. The closure of a case means that the Department of Natural Resources (DNR) has determined that no further response is required at that time based on the information that has been submitted to the DNR. All sections of this form must be completed unless otherwise directed by the Department. Incomplete forms will be considered "administratively incomplete" and processing of the request will stop until required information is provided. Any section of the form not relevant to the case closure request must be fully filled out or explained on a separate page and attached to the relevant section of this form. DNR will consider your request administratively complete when the form and all sections are completed, all attachments are included, and the applicable fees required under ch. NR 749, Wis. Adm. Code, are included, and sent to the proper destinations. Personal information collected will be used for administrative purposes and may be provided to requesters to the extent required by Wisconsin's Open Records Law (ss. 19.31 - 19.39, Wis. Stats.).

Site Information			
BRRTS No.	Parcel ID No.		
02-36-000153	053-211-102-001.08		
BRRTS Activity (Site) Name	WTM Coordinates		
Fmr. Paragon Electric Company, Inc.	X 713189	Y 410167	
Street Address	City	State	ZIP Code
606 Parkway Boulevard	Two Rivers	WI	54241
Responsible Party (RP) Name			
Paul A. Ahearn			
Company Name			
Ranco Incorporated of Delaware c/o Invensys			
Street Address	City	State	ZIP Code
33 Commercial Street, B51-2J	Foxboro	MA	02035
Phone Number	Email		
(508) 549-4949	paul.ahearn@invensys.com		
<input type="checkbox"/> Check here if the RP is the owner of the source property.			
Environmental Consultant Name			
Vasanta M. Kalluri			
Consulting Firm			
AECOM			
Street Address	City	State	ZIP Code
717 17th Street, Suite 2600	Denver	CO	80202
Phone Number	Email		
(303) 228-3058	vasanta.kalluri@aecom.com		
Acres Ready For Use	Voluntary Party Liability Exemption Site? <input checked="" type="radio"/> Yes <input type="radio"/> No		
26.7			

**Fees and Mailing of Closure Request**

*If any section is not relevant to the case closure request, you must fully explain the reasons why and attach that explanation to the relevant section of the form. All information submitted shall be legible. Providing illegible information may result in a submittal being considered incomplete until corrected.*

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

- \$750 Closure Fee  \$200 GIS Registry Fee for Soil
- \$250 GIS Registry Fee for Groundwater Lost Well(s) Total Amount of Payment \$ \_\_\_\_\_

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



## Site Summary

*If any section is not relevant to the case closure request, you must fully explain the reasons why and attach that explanation to the relevant section of the form. All information submitted shall be legible. Providing illegible information may result in a submittal being considered incomplete until corrected.*

### 1. General Site Information and Site History

**A. Site Location:** Describe the physical location of the site, both generally and specific to its immediate surroundings.

The former Paragon Electric Company, Inc. site (Site) is located at 606 Parkway Boulevard, Two Rivers, Manitowoc County, Wisconsin. Paragon Electric Company, Inc. merged in to Ranco Incorporated of Delaware on March 21, 2003.

The Site is located in the southern 1/2 of Section 2 and the northern 1/2 of Section 11, Township 19 North, Range 24 East. The Site is bordered by 7th Street on the north side, Bucholtz Street on the east side, a railroad right-of-way on the south side and Columbus Street on the west side. The Site is approximately 26.7 acres in area. Site features include the former manufacturing/office building, two asphalt parking areas, an access road, and grassy areas, as shown in Figure B.1.a. Figure B.2.b provides details of the manufacturing building interiors and utility locations. The original plant was built in 1957. The most recent 126,000 square feet (ft) addition was built in 1978. The area north and east of the Site is predominantly residential. The area west of the Site is predominantly commercial/industrial in use. The south (downgradient) property boundary is bordered by the Wisconsin Central Ltd. railroad right-of-way, followed by State Highway 42 and some residential and commercial properties including a gas station. Lake Michigan is located south of the highway, approximately 400 ft from the Site property line.

**B. Prior and current site usage:** Specifically describe the current and historic occupancy and types of use.

Historically, the Site was used to manufacture electrical components since 1957. Before 1957, the Site was partially used as farm land and was partially undeveloped land. Manufacturing operations occurred on the Site from 1957 through late 1990s. After manufacturing operations ceased, the Site was used as a storage facility (warehouse). Presently, the property is unoccupied and unused.

**C. Describe how and when site contamination was discovered.**

Trichloroethene (TCE), a chlorinated solvent, was used for parts-cleaning in the former manufacturing process on the Site. In March 1985, soil and groundwater TCE impacts were discovered on the site during subsurface exploration, which was initiated in response to a potential release of TCE. In August 1991, a subsurface exploration for characterizing soil and groundwater conditions at the Site was conducted. Results indicated the presence of chlorinated-solvent-contaminated unsaturated soil at the contaminant source area (former degreasing pit). Chlorinated volatile organic compounds (VOCs), namely, TCE, cis 1,2-dichloroethylene (1,2-DCE), and tetrachloroethene (PCE), were identified near the source area. The WDNR assigned an Environmental Remediation Program Bureau for Remediation and Redevelopment Tracking System (BRRTS) number (02-36-000153) to the TCE release on February 24, 1989.

The TCE release case was investigated, remediated and conditionally closed by the WDNR on September 27, 2006. On June 6, 2008, Invensys Inc. was approved by the WDNR to proceed with Voluntary Party Liability Exemption (VPLE) process BRRTS number (06-36-551669). Currently, both BRRTS numbers 02-36-000153 and 06-36-551669 are open. A Phase I Environmental Site Assessment (ESA) was conducted under the VPLE process to identify Recognized Environmental Concerns (RECs) on the site. Chlorinated VOCs, namely PCE, TCE and degradation products, remained the primary contaminants on site. Other RECs identified during the Phase I ESA were also investigated during the Phase II ESA and addressed as necessary.

**D. Describe the type(s) and source(s) or suspected source(s) of contamination.**

The primary contaminants on the site are chlorinated VOCs (PCE, TCE, 1,2-DCE and vinyl chloride). The source of these contaminants are historical parts-cleaning operations in the Degreaser Pit, painting operations in the Paint area and chemical storage in the Storage area as shown in Figure B.1.b.

In this document,

- The former Painting area and Paint Vault area are referred to as the Paint area,
- The former Degreaser Pit located in the Press room is referred to as the Press area, and
- The former Hazardous and Solid Waste Storage area is referred to as the Storage area.

**E. Other relevant site description information (or enter Not Applicable).**

As mentioned in 1.C above, the original TCE release case has been conditionally closed by the WDNR. This closure request provides information obtained since 2008 related to closure of the site under the VPLE process. Historical data is referred to only where relevant.

**F. List BRRTS activity site name and number for all other BRRTS activities at this property, including closed cases.**

PLT-606 Parkway Blvd (Spill- Historic) - 04-36-039873  
Paragon Electric Company, Inc. (ERP- Cond) - 02-36-000153  
600 BLK Parkway Blvd (Spill - Open) - 04-36-045266  
Paragon (Invensys) (General Property) - 07-36-550503

Former Paragon Electric Co. Inc. (VPLE- Open) - 06-36-551669

- G. List BRRTS activity/site name(s) and number(s) for all properties immediately adjacent to this site, and those impacted by contamination from this site.

BRRTS Activity/ Site Names and Numbers of all neighboring properties within 1200 feet of the Site (see Figure B.1.c):  
Wisconsin Public Service (Closed) - 03-360-02121 (Northwest of the Site)  
Citgo Express (Closed) - 03-361-74861 (South of the Site)  
Two Rivers Bulk Plant (Closed) - 02-362-22781 (East of the site)

- H. **Current zoning** (e.g. industrial, commercial, residential) for the site and for neighboring properties, and how verified (Provide documentation in Attachment G).

The Site is zoned industrial. The neighboring properties are zoned industrial, commercial and residential. A City of Two Rivers District Zoning Map is provided in Attachment G.

## 2. General Site Conditions

### A. Soil/Geology

- i. Describe soil type(s) and relevant physical properties, thickness of soil column across the site, vertical and lateral variations in soil types.  
The Site is located in an area of surficial lake deposits, which consist of organic matter and stratified clay, silt and sand. The on-site soil borings revealed fine to medium, poorly graded sand with a Unified Soil Classification System (USCS) designation of SP. Based on soil boring logs of monitoring wells installed near the Site, sand deposits appear to be underlain by a thin layer (1 to 5 ft in thickness) of clay at a depth of approximately 40 ft below ground surface (bgs). Below this layer, up to 15 ft of fine sand underlain by a dense clay layer was observed.
- ii. Describe the composition, location and lateral extent, and depth of fill or waste deposits on the site.  
A obvious fill layer was not observed in soil borings completed on the site. Possible fill layers extended from 2 to 7 feet below ground surface in sandy soils.
- iii. Depth to bedrock, bedrock type, and whether or not it was encountered during the investigation.  
Private well logs in the vicinity of the Site indicate that the bedrock is approximately 90 ft bgs. Bedrock in the area consists of undifferentiated Silurian and Devonian dolomite, which ranges from 0 to 750 ft in thickness (Hydrologic Investigations Atlas, HA-432, 1973). Bedrock was not encountered during Site investigation.
- iv. Describe the nature and locations of current surface cover(s) across the site (e.g. natural vegetation, landscaped areas, gravel, hard surfaces, and buildings).  
As seen in Figures B.1.a and B.1.b, the site is mainly occupied by a large office/manufacturing building, the remaining area of the Site is occupied by two asphalt parking lots to west and southwest of the building, grassy areas with some trees and access roads.

### B. Groundwater

- i. **Discuss depth to groundwater and piezometric elevations.** Describe and explain depth variations, and whether free product affects measurement or water table elevation. Describe the stratigraphic unit(s) where water table was found or which were measured for piezometric levels.  
The groundwater table was encountered approximately 7 to 14 ft bgs in monitoring wells within the upper fine to medium sand layer.
- ii. Discuss groundwater flow direction(s), shallow and deep. Describe and explain flow variations, including fracture flow if present.  
The groundwater flow direction is south to southeast at a horizontal hydraulic gradient of approximately 0.007 ft per foot toward Lake Michigan. Regional groundwater flow is also likely to be influenced by the West Twin River located approximately 1 mile northeast of the Site.
- iii. Discuss groundwater flow characteristics: hydraulic conductivity, flow rate and permeability, or state why this information was not obtained.  
The hydraulic conductivities in existing wells PZ-7, PZ-14, and EXT-15 (based on field test data), range from  $1 \times 10^{-4}$  centimeters per second (cm/sec) in EXT-15 to  $2 \times 10^{-3}$  cm/sec in PZ-7. Correspondingly, the calculated horizontal groundwater flow velocity varies from  $2 \times 10^{-6}$  cm/sec to  $5 \times 10^{-5}$  cm/sec (approximately 2 to 52 ft per year)
- iv. Identify and describe locations/distance of potable and/or municipal Wells within 1200 feet of the site.  
The City of Two Rivers obtains its municipal water supply from Lake Michigan through a water intake pipe located about 6,000 feet offshore from the municipal sewage treatment plant. The water intake is located approximately 7000 feet southeast of the Site. There are no known potable wells within 1200 feet of the site. The Site and adjacent properties (located within the City limits) obtain drinking water from the municipal water supply.

### 3. Site Investigation Summary

#### A. General

- i. Provide a brief summary of the site investigation history. Reference previous submittals by name and date. Describe site investigation activities undertaken since the last submittal for this project and attach the appropriate documentation in Attachment C, if not previously provided.

As mentioned in 1.C earlier, the original TCE release case has been conditionally closed by the WDNR. This closure request provides information obtained since 2008 related to closure of the site under the VPLE process. Historical data is referred to only where relevant.

The Site entered the VPLE Program on May 28, 2008 by submitting a Request for VPLE Eligibility Determination (Form 440 and a Work Plan for Site Assessment. The application was accepted by the WDNR on June 6, 2008. A Phase I ESA was completed in accordance with the VPLE Program requirements and a report was submitted to the WDNR on December 2, 2008. Multiple RECs were identified in Phase I ESA that required further investigation or action. A work plan to address the RECs was submitted to the WDNR on December 2, 2008. The Work Plan was approved by the WDNR on September 1, 2009 after further modifications.

The Phase II ESA included investigation of RECs, including collecting soil, groundwater and soil vapor samples. The Phase II ESA report was submitted to the WDNR on September 16, 2010. Based on the results of the Phase II ESA, a work plan for sampling and remedial action was submitted to the WDNR on May 27, 2011. The work plan was approved by the WDNR on July 28, 2011 after further modifications.

Remedial action included installing and operating a soil vapor extraction system to address chlorinated VOCs in soil and soil vapor. Remedial action also included investigation, removal and disposal of an underground vessel located southwest of the Paint room.

- ii. Identify whether contamination extends beyond the source property boundary, describe the off-site media (e.g., soil, groundwater, etc.) impacted, and the vertical and horizontal extent of off-site impacts.  
TCE, 1,2 DCE and vinyl chloride concentrations in groundwater exceeding NR 140 Enforcement Standard (ES) and Preventive Action Limit (PAL) extend downgradient beyond the property boundary. The impacts extend vertically from the water table (6 to 14 feet below ground surface) to approximately 40 feet below ground surface. Figures B.3.a and B.3.b show the vertical and lateral extents of the ES and PAL exceedances.
- iii. Identify any structural impediments to the completion of site investigation and/or remediation and whether these impediments are on the source property or off the source property. Identify the type and location of any structural impediment (e.g., structure) that also serves as the performance standard barrier for protection of the direct contact or the groundwater pathway.

There were no structural impediment to the completion of site investigation or remediation. The concrete floor slab in the Press area, Paint area and Storage area serve as performance standard barrier for the protection of infiltration to groundwater (groundwater pathway).

#### B. Soil

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

Soil contamination at this site is related to chlorinated VOCs (PCE and TCE) resulting from storage and use in painting and parts-cleaning operations. Arsenic is considered to be from natural sources and characteristic of background concentrations.

The soil concentrations do not exceed direct contact residual contaminant levels (RCLs) for either industrial and non-industrial settings. The low level soil concentrations exceed soil-to-groundwater leaching pathway RCL in the Storage, Press and Paint areas within the manufacturing building. No soil impacts are present outside the building. Off-site impacts related to the release on the Site are not present.

- ii. Describe the level and types of **soil contaminants** found in the upper four feet of the soil column.  
The soil concentrations do not exceed direct contact residual contaminant levels (RCLs) for both industrial and non-industrial settings. The low level soil concentrations exceed soil-to-groundwater leaching pathway RCL in the Storage, Press and Paint areas in the top four feet within the manufacturing building. See Tables A.2 and A.3 and Figures B.2.a (1) through (3), B.2.b(1) through (3) for details.
- iii. Identify the ch. NR 720, Wis. Adm. Code, method used to establish the soil cleanup standards for this site: for example, a Residual Contaminant Level (RCL), a Site-Specific Residual Contaminant Level (SSRCL), or a Performance Standard as determined under ss NR 720.09, 720.11 and 720.19, Wis. Adm. Code. Identify the land use classification that was used to establish cleanup standards. Provide a copy of the supporting calculations/information in Attachment C.  
Generic RCLs for industrial and non-industrial exposure were used as the soil cleanup standards. Site-specific RCLs were not calculated. Therefore no calculations are included in Attachment C.

### C. Groundwater

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

The groundwater contamination at the Site is related chlorinated VOCs (PCE, TCE, 1,2-DCE, vinyl chloride) originating from the Degreaser pit in the Press Room that was historically used for parts cleaning. The groundwater chlorinated VOCs plume migrated in southeast direction, along the groundwater flow direction, beyond the property line. Figures B.3.a and B.3.b provide the vertical and lateral extents of ES and PAL exceedances based on the most recent data. The offsite ES exceedances are expected to naturally attenuate without adversely affecting Lake Michigan as discussed in the previous Site closure request in January 2006, when the WDNR issued conditional closure to the TCE release case. Since conditional closure was granted in 2006, the groundwater concentrations are continuing to decrease as seen in the 2011 and 2013 sampling results.

The City of Two Rivers obtains its drinking water from an intake in Lake Michigan. ES exceedances related to the Site are not expected to affect the drinking water intake, which is located 7,000 feet from the Site. There are no known impacts to the utilities or the building foundation drains.

- ii. Describe the presence of free product at the site, including the thickness, depth, and locations.  
Free product was not encountered on the Site.

### D. Vapor

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

To investigate the potential for indoor vapor migration from subsurface impacts, sub-slab vapor sampling using High Purge Volume (HPV) sampling technique was completed at this site in the Storage area, Machine Shop area, Receiving Dock area, Press Room area and Paint area. The sampling procedures and results were submitted to the WDNR in the Phase II ESA report. The results are also summarized on Table A.5 and Figure B.4.a (1). Based on the results of the HPV sampling, where TCE concentrations exceeding the action levels were observed, a remedial action was implemented on the site. Post-remedial sub-slab soil vapor samples collected using summa canisters indicate that acceptable soil vapor concentrations have been achieved. The results are also summarized on Table A.5 and Figure B.4.a (2)

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

EPA Region III RBC Non-Residential Sub-Slab Soil Gas Screening levels for a large industrial or commercial building (attenuation factor of 0.001) were used as the action levels. TCE was observed at 30,200 ug/m<sup>3</sup> (Storage area) and 14,400 ug/m<sup>3</sup> (in V-5 located on the border of Press Room and Paint area), which are above the EPA Non-Residential Sub-Slab Soil Gas Screening Levels of 880 ug/m<sup>3</sup>. The concentrations at other sampling locations were below the Screening Level. As the remedial action to address the TCE exceedances, soil vapor extraction (SVE) system was installed and operated for approximately 1 year. The post-remedial sub-slab soil vapor samples were 64.8 ug/m<sup>3</sup> in the Storage area, 1,120 ug/m<sup>3</sup> in the Press area and 405 ug/m<sup>3</sup> in the Paint area. The remedial action reduced TCE soil vapor concentrations by 99.8% in the Storage area, 92% in the Press Room area and 97% in the Paint area.

### E. Surface Water and Sediment

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

The assessment of surface water and sediments is not needed for this project.

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

Not applicable.

## 4. Remedial Actions Implemented and Residual Levels at Closure

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

Prior to 2002, remedial action was implemented on the Site for the TCE release case that was conditionally closed in 2006. The remedial actions included SVE, and groundwater sparging and extraction. These historic remedial actions and related sampling were documented in WDNR submittals prior to 2006 and are not discussed in this closure request submittal. The list of pre-2006 remediation documents is as follows:

- 1) April 23, 1992: Results of Site Assessment and Corrective Action
- 2) August 12, 1993: Progress Report and Downgradient Groundwater Extraction Work Plan

- 3) April 27, 1994: 1993 Progress Report and Downgradient Groundwater Extraction Construction Record
- 4) June 22, 1995: Progress Report March 1995 and Construction Documentation of Downgradient Extraction Well EXT-16

Additional remedial actions were also implemented in 2011 to 2013 to achieve a Certificate of Completion under the VPLE Program. These remedial actions include: 1) SVE in Storage area, Press area and Paint area and 2) Assessment, excavation and disposal of the underground vessel located southwest of the Paint Room. Documentation related to these remedial actions is included in Attachment C

- B. Describe any immediate or interim actions taken at the site under ch NR 708, Wis. Adm. Code.  
None implemented at the Site under VPLE Program.

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

The following active remedial actions were taken at the site:

1) Soil Vapor Extraction (SVE)

SVE was implemented to address soil vapor TCE impacts and to remove TCE from soil vadose zone to reduce groundwater impacts due to leaching. See Figure B.4.a(2) for the locations of SVE. Attachment C provides a detailed documentation of SVE. SVE resulted in reducing TCE concentrations in the Storage area from 30,200 ug/m<sup>3</sup> to 64.8 ug/m<sup>3</sup> (99.8% decrease); from 14,400 ug/m<sup>3</sup> to 1,120 ug/m<sup>3</sup> (92% decrease) in the Press Room area and from 14,400 ug/m<sup>3</sup> to 406 ug/m<sup>3</sup> in the Paint area (97% decrease). The present concentrations are below or slightly above the action level of 880 ug/m<sup>3</sup> and are considered acceptable by the WDNR for current site usage. SVE also reduced the extent of residual soil impacts as shown by pre and post remediation extents in Figures B.2.a(1) through (3), B.2.b(1) through (3). The operational history of SVE system is summarized in Table A.8.

2) Assessment, Excavation and Disposal of an Underground Vessel

Phase II ESA revealed that a trench drain in the Paint Vault was not connected to the sewer system and instead drained into an underground vessel. Further assessment of the underground vessel was performed in January 2012. The vessel was exposed and the interior revealed that the vessel did not have an outlet. The vessel contained water and sludge. The vessel was emptied and the structure was removed and disposed of appropriately after required sampling for disposal was completed. Details of the remedial action are provided in Attachment C. Confirmation samples collected from the side walls and base after the vessel was removed did not indicate soil impacts. VOCs and metals were not detected in the confirmation samples, except for arsenic, barium, chromium, lead, silver and mercury, which were detected in concentrations similar to site background concentrations or in low concentration (cadmium) below applicable action levels. The confirmation sample results are provided in Table A.4.

- D. Provide a discussion of the nature, degree and extent of residual contamination that will remain at the site or on off-site affected properties after case closure.

The residual contamination that will remain on the site after closure includes:

1) Soil-to-Groundwater Leaching Pathway RCL exceedance of TCE and PCE concentrations in the unsaturated soils below the concrete floor slab in the Storage, Press and Paint Areas. The degree and the extent of residual contamination are small as shown in Figures B.2.b(1), (2) and (3) and Table A.3. The highest remaining TCE concentration in soil is 121 ug/kg and PCE concentration is 33.7(J) ug/kg.

2) ES and PAL exceedance of TCE, 1,2-DCE and vinyl chloride in groundwater. The extent and degree of ES and PAL exceedances are shown on Figure B.3.b. The ES and PAL exceedances extend beyond the property boundary to downgradient offsite properties. The highest concentrations on-site are TCE at 63.1 ug/L, 1,2 DCE at 10.6 ug/L and vinyl chloride at 2.7 ug/L. The offsite concentrations were last measured in 2005. In 2005, the highest concentrations were TCE at 270 ug/L, 1,2 DCE at 3,000 ug/L and vinyl chloride at 140 ug/L. The TCE/PCE source is no longer present on the Site. The groundwater concentrations observed on-site in 2011 and 2013 compared to historical concentrations indicate continuing decreasing concentrations.

3) TCE concentration in sub-slab soil vapor is 1,120 ug/kg in the Press area as shown in Figure B.4.a(2), near the non-residential screening level of 880 ug/kg .

- E. Describe the remaining soil contamination within four feet of ground surface (direct contact zone) that attains or exceeds the ch. NR720, Wis. Adm. Code, standard(s) for direct contact.

The soil on the Site is below the direct contact standards for both residential and industrial use of the property.

- F. Describe the remaining soil contamination in the vadose zone that attains or exceeds the soil standard(s) for the groundwater pathway.

TCE and PCE are present in low levels at concentrations ranging from below detection limit to 121 ug/kg for TCE and 33.7 (J) ug/kg for PCE. TCE and PCE concentrations exceed the soil-to-groundwater leaching pathway RCLs of 3.6 ug/kg and 4.5 ug/kg, respectively. The areas of standard exceedance are inside the manufacturing building, in the Storage, Press and Paint areas as shown in Figure B.2.b (1), (2) and (3). These areas are covered by a concrete floor slab.

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

The building concrete floor slab will be considered a barrier to infiltration of water through soil containing PCE and TCE in exceedance of soil-to-groundwater leaching pathway RCL. The barrier will be maintained after closure to control future infiltration of PCE or TCE to groundwater. The remaining chlorinated VOCs in groundwater exceeding ES and PAL will naturally attenuate through dilution and biodegradation as discussed in the 2006 closure request. The groundwater concentrations observed in 2011 and 2013 indicate continuing decreasing concentrations in comparison to historical concentrations and provide evidence that the groundwater plume is continuing to natural attenuate and recede.

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

Natural attenuation was accepted by the WDNR as a closure remedy when it issued a conditional closure in 2006. The source of PCE and TCE has not been on the site since the manufacturing operations were ceased in late 1990s. Therefore, the potential for additional releases since the 2006 conditional closure is not present. Furthermore, the groundwater concentrations observed in 2011 and 2013 indicate continuing decreasing concentrations in comparison to historical concentrations and provide additional evidence that the groundwater plume is continuing to natural attenuate and recede.

- I. Identify how all exposure pathways were removed and/or adequately addressed by immediate and/or remedial action(s) described above in paragraphs, B, C, D, E and F.

The SVE system reduced soil vapor concentrations of TCE by 99.8% in the Storage area, 92% in the Press area and 97% in the Paint area. The present sub-slab soil vapor concentrations are considered acceptable by the WDNR for the current use of the property.

Underground vessel excavation and disposal removed a potential source of contamination from the site. Confirmatory soil samples indicated that the surrounding soil was unimpacted. In the confirmation samples, volatile organic compounds were not detected and metals were either not detected or were present in concentrations similar to the background.

A barrier (concrete building floor slab) covers the residual soil impacts in the Storage, Press and Paint areas.

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

No remedial system hardware is expected to be left in place after site closure.

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

Not Applicable. The Site will be placed on the GIS Registry.

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

During the HPV sampling of sub-slab soil gas, TCE was observed at 30,200 ug/m<sup>3</sup> (Storage area) and 14,400 ug/m<sup>3</sup> (in V-5 located on the border of Press Room and Paint area), which are above the EPA Non-Residential Sub-Slab Soil Gas Screening Levels of 880 ug/m<sup>3</sup>. To address the exceedances, a SVE system was installed and operated for approximately 1 year. The post-remedial sub-slab soil vapor samples were 64.8 ug/m<sup>3</sup> in the Storage, 1,120 ug/m<sup>3</sup> in the Press Room area and 405 ug/m<sup>3</sup> in the Paint area. The remedial action reduced TCE soil vapor concentrations by 99.8% in the Storage area, 92% in the Press Room area and 97% in the Paint area.

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

Surface water and sediment contamination assessment was not necessary at the Site and therefore not performed.

**5. Continuing Obligations: Situations where a maintenance plan(s) and inclusion on DNR's GIS Registry are required.**

Directions: Check all that apply to this case closure request:

	This scenario Applies to this Case Closure		Case Closure Scenario: Maintenance Plans and GIS Registry	Maintenance Plan (s) Required in Attachment D	GIS Registry Listing
	A. On-Site	B. Off-Site			
i.	<input type="checkbox"/>	<input type="checkbox"/>	Engineering Control/Barrier for Direct Contact	✓	✓
ii.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Engineering Control/Barrier for Groundwater Infiltration	✓	✓
iii.	<input type="checkbox"/>	<input type="checkbox"/>	Vapor Mitigation - post closure passive system	✓	✓
iv.	<input type="checkbox"/>	<input type="checkbox"/>	Vapor Mitigation - post closure active system	✓	✓
v.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	None of the above scenarios apply to this case closure	NA	NA

**6. Continuing Obligations: Situations where inclusion on DNR's GIS Registry is required.**

Directions: Check all that apply to this case closure request:

	This scenario Applies to this Case Closure		Case Closure Scenario: GIS Registry Only	GIS Registry Listing
	A. On-Site	B. Off-Site		
i.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Residual soil contamination exceeds ch. NR 720 generic or site-specific RCLs	✓
ii.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Sites with groundwater contamination equal to or greater than the ch. NR 140, enforcement standards (ES)	✓
iii.	<input type="checkbox"/>	<input type="checkbox"/>	Monitoring wells: lost, transferred or remaining in use	✓
iv.	<input type="checkbox"/>	<input type="checkbox"/>	Structural Impediment (not as a performance standard)	✓
v.	<input type="checkbox"/>	<input type="checkbox"/>	Residual soil contamination remaining at ch. NR 720 Industrial Use levels	✓
vi.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Vapor intrusion may be future, post-closure issue if building use or land use changes	✓
vii.	<input type="checkbox"/>	<input type="checkbox"/>	None of the above scenarios apply to this case closure	NA

**7. Underground Storage Tanks**

- A. Were any tanks, piping or other associated tank system components removed as part of the investigation or remedial action?  Yes  No
- B. Do any upgraded tanks meeting the requirements of ch. SPS 310, Wis. Adm. Code, exist on the property?  Yes  No
- C. If the answer to question 7b is yes, is the leak detection system currently being monitored?  Yes  No

**Data Tables (Attachment A)**

*If any section is not relevant to the case closure request, you must fully explain the reasons why and attach that explanation to the relevant section of the form. All information submitted shall be legible. Providing illegible information may result in a submittal being considered incomplete until corrected.*

**General directions for Data Tables:**

- Use bold and italics font on information of importance on tables and figures. Use **bold font** for ch. NR 140, Wis. Adm. Code, groundwater enforcement standard (ES) attainments or exceedances, and *italicized font* for ch. NR 140, Wis. Adm. Code, groundwater preventive action limit (PAL) standard attainments or exceedances.
- Do not use shading or highlighting on the analytical tables.
- Include on Data Tables the level of detection for results which are below the detection level (i.e. do not just list as no detect (ND)).
- Include the units on data tables.

- Summaries of all data must include information collected by previous consultants.
- Do not submit lab data sheets unless these have not been submitted in a previous report. Tabulate all data required in s. NR 716.15(2)(g)3, Wis. Adm. Code, in the format required in s. NR 716.15(2)(h)3, Wis. Adm. Code.
- Include in Attachment A all of the following tables, in the order prescribed below, with the specific Closure Form titles noted on the separate attachments (e.g., Title: A.1. Groundwater Analytical Table; A.2. Pre-remedial Soil Analytical Table, etc).
- For required documents, each table (e.g., A.1., A.2., etc.,) should be a separate PDF.

#### A. Data Tables

- A.1. **Groundwater Analytical Table(s):** Table(s) showing the analytical results and collection dates, for all groundwater sampling points e.g. monitoring wells, temporary wells, sumps, extraction wells, any potable wells and any other wells, extraction wells and any potable wells for which samples have been collected.
- A.2. **Pre-remedial Soil Analytical Table(s):** Table(s) showing the soil analytical results and collection dates - prior to conducting the interim and/or remedial action. Indicate if sample was collected above or below the all-time low water table (unsaturated verses saturated).
- A.3. **Post-remedial Soil Analytical Table(s):** Table(s) showing the post-remedial action soil analytical results and collection dates. Indicate if sample was collected above or below the all-time low water table (unsaturated verses saturated).
- A.4. **Pre and Post Remaining Soil Contamination Soil Analytical Table(s):** Table(s) showing only the pre and post remedial action soil analytical results that exceed a Residual Contaminate Level (RCL) or a Site-Specific Residual Level (SSRCL).
- A.5. **Vapor Analytical Table:** Table(s) showing type(s) of samples, sample collection methods, analytical method, sample results, date of sample collection, time period for sample collection, method and results of leak detection, and date, method and results of communication testing.
- A.6. **Other Media of Concern (e.g., sediment or surface water):** Table(s) showing type(s) of sample, sample collection method, analytical method, sample results, date of sample collection, time period for sample collection, method and results sampling.
- A.7. **Water Level Elevations:** Table(s) showing all water level elevation measurements and dates from all monitoring wells. If present, free product should be noted on the table.
- A.8. **Other:** This attachment should include: 1) any available tabulated natural attenuation data; 2) data tables pertaining to engineered remedial systems that document operational history, demonstrate system performance and effectiveness, and display emissions data; and (3) any other data tables relevant to case closure not otherwise noted above. If this section is not applicable, please explain the reasons why.

#### Maps and Figures (Attachment B)

*If any section is not relevant to the case closure request, you must fully explain the reasons why and attach that explanation to the relevant section of the form. All information submitted shall be legible. Providing illegible information may result in a submittal being considered incomplete until corrected.*

#### General Directions for all Maps and Figures:

- If any map or figure is not relevant to the case closure request, you must fully explain the reason(s) why and attach that explanation (properly labeled with the map/ figure title) in Attachment B.
- Provide on paper no larger than 11 x 17 inches, unless otherwise directed by the Department. Maps and figures may be submitted in a larger electronic size than 11x17 inches, in a portable document format (pdf) readable by the Adobe Acrobat Reader. However, those larger-size documents must be legible when printed.
- Prepare visual aids, including maps, plans, drawings, fence diagrams, tables and photographs according to the applicable portions of ss. NR 716.15(2)(h)1 and 726.05(3)(a)4.d, Wis Adm. Code.
- Do not use shading or highlights on any of the analytical tables.
- Include all sample locations.
- Contour lines should be clearly labeled and defined.
- Include in Attachment B all of the following maps and figures, in the order prescribed below, with the specific Closure Form titles noted on the separate attachments (e.g., Title: B.1. Location Map; B.2. Detailed Site Map, etc).
- For the electronic copies that are required, each map (e.g., B.1.a., B.2.a, etc.,) should be a separate PDF.

#### B.1. Location Maps

- B.1.a. **Location Map:** A map outlining all properties within the contaminated site boundaries on a U.S.G.S. topographic map or plat map in sufficient detail to permit easy location of all impacted and/or adjacent parcels. If groundwater standards are exceeded, include the location of all potable wells, including municipal wells, within 1200 feet of the area of contamination.
- B.1.b. **Detailed Site Map:** A map that shows all relevant features (buildings, roads, current ground surface cover, individual property boundaries for on-site and applicable off-site properties, contaminant sources, utility lines, monitoring wells and potable wells) within the contaminated area. This map is to show the location of all contaminated public streets, and highway and railroad rights-of-way in relation to the source property and in relation to the boundaries of groundwater contamination exceeding a ch. NR 140 Enforcement Standard (ES), and/or in relation to the boundaries of soil contamination exceeding a Residual Contaminant Level (RCL) or a Site Specific Residual Contaminant Levels



(SSRCL) as determined under ss. NR 720.09, 720.11 and 720.19, Wis. Adm. Code.

- B.1.c. **RR Site Map:** From RR Sites Map (<http://dnrmaps.wi.gov/imf/imf.jsp?site=brrts2>) attach a map depicting the source property, and all open and closed BRRTS sites within a half-mile radius or less of the property.

## B.2. Soil Figures

- B.2.a. **Pre-remedial Soil Contamination:** Figure(s) showing the sample location of all pre-remedial, unsaturated contaminated soil and a single contour showing the horizontal extent of each area of contiguous residual soil contamination that exceeded a Residual Contaminant Level (RCL) or a Site-Specific Residual Contaminant Level (SSRCL) as determined under ss. NR 720.09, 720.11 and 720.19, Wis. Adm. Code.
- B.2.b. **Post-remedial Soil Contamination :** Figure(s) showing the sample location of all post-remedial, unsaturated contaminated soil and a single contour showing the horizontal extent of each area of contiguous residual soil contamination that exceeds a Residual Contaminant Level (RCL) or a Site-Specific Residual Contaminant Level (SSRCL) as determined under ss. NR 720.09, 720.11 and 720.19, Wis. Adm. Code. A separate contour line should be used to indicate the extent of residual direct contact exceedances.
- B.2.c. **Pre/Post Remaining Soil Contamination:** Figure(s) showing the only location of all pre and post remedial residual soil sample location(s) where unsaturated contaminated soil remains after remediation and a single contour showing the horizontal extent of each area of contiguous residual soil contamination that exceeds a Residual Contaminant Level (RCL) or a Site-Specific Residual Level (SSRCL) as determined under ss. NR 720.09, 720.11 and 720.19, Wis. Admin. Code. A separate contour line should be used to indicate the extent of residual direct contact exceedances.

## B.3. Groundwater Figures

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

## B.4. Vapor Maps and Other Media

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

## Documentation of Remedial Action (Attachment C)

*If any section is not relevant to the case closure request, you must fully explain the reasons why and attach that explanation to the relevant section of the form. All information submitted shall be legible. Providing illegible information may result in a submittal being considered incomplete until corrected.*

### General Directions:

- Include in Attachment C all of the following documentation, in the order prescribed below, with the specific Closure Form titles noted on the separate attachments (e.g., Title: C.1. Site Investigation Documentation; C.2. Investigative Waste, etc).
- If the documentation requested below is "not applicable" to the site-specific circumstances, include a brief explanation to support that conclusion.
- If the documentation requested below has already been submitted to the Department, please note the title and date of the report for

that particular document requested.

- C.1. **Site investigation documentation**, that has not otherwise been previously submitted.
- C.2. **Investigative waste** disposal documentation.
- C.3. **NR 720.19 analysis**, assumptions and calculations for site specific RCLs (SSRCLs) , with justification, including EPA Soil Screening Level Model Calculations and results.
- C.4. **Construction documentation** or as-built report for any constructed remedial action or portion of, or interim action specified in s. NR 724.02(1), Wis. Adm. Code.
- C.5. **Decommissioning of Remedial Systems**. Include plans to properly abandon any systems or equipment upon receiving conditional closure.
- C.6. **Photos**. For sites or facilities with a cover or other performance standard, a structural impediment or a vapor mitigation system. Include one or more photographs documenting the condition and extent of the feature at the time of the closure request. Pertinent features should be visible and discernible. Photographs must be labeled with the site name, the features shown, location and the date on which the photograph was taken.
- C.7. **Other**. Include any other relevant documentation not otherwise noted above. (This section may remain blank)

#### **Maintenance Plan(s) (Attachment D)**

*If any section is not relevant to the case closure request, you must fully explain the reasons why and attach that explanation to the relevant section of the form. All information submitted shall be legible. Providing illegible information may result in a submittal being considered incomplete until corrected.*

When one or more "maintenance plans" are required for a site closure, include in each maintenance plan all required information in sections D.1. through D.5. below, and attach the plan(s) in Attachment D. The following "model" maintenance plans can be located at: (1) Maintenance plan for a engineering control or cover: <http://dnr.wi.gov/topic/Brownfields/documents/maintenance-plan.pdf>; and (2) Maintenance plan for vapor intrusion: [http://dnr.wi.gov/topic/Brownfields/documents/appendix5\\_606.pdf](http://dnr.wi.gov/topic/Brownfields/documents/appendix5_606.pdf).

- D.1. **Location map(s)** which show(s): (1) the feature that requires maintenance; (2) the location of the feature(s) that require(s) maintenance - on and off the source property; (3) the extent of the structure or feature(s) to be maintained, in relation to other structures or features on the site; (4) the extent and type of residual contamination; and (5) and all property boundaries.
- D.2. **Brief descriptions** of the type, depth and location of residual contamination.
- D.3. **Description of maintenance action(s)** required for maximizing effectiveness of the engineered control, vapor mitigation system, feature or other action for which maintenance is required.
- D.4. **Inspection log**, to be maintained on site, or at a location specified in the maintenance plan or approval letter.
- D.5. **Contact information**, including the name, address and phone number of the individual or facility who will be conducting the maintenance.

#### **Monitoring Well Information (Attachment E)**

*If any section is not relevant to the case closure request, you must fully explain the reasons why and attach that explanation to the relevant section of the form. All information submitted shall be legible. Providing illegible information may result in a submittal being considered incomplete until corrected.*

##### **General Directions:**

Attach monitoring well construction and development forms (DNR FORM 4400-113 A and B: [http://dnr.wi.gov/topic/groundwater/documents/forms/4400\\_113\\_1\\_2.pdf](http://dnr.wi.gov/topic/groundwater/documents/forms/4400_113_1_2.pdf)) for all wells that will remain in-use, be transferred to another party or that could not be located. A figure of these wells should be included in Attachment B.3.d.

##### **Select One:**

- No monitoring wells were required as part of this response action.
- All monitoring wells have been located and will be properly abandoned upon the DNR granting conditional closure to the site
- Select One or More:**
  - Not all monitoring wells can be located, despite good faith efforts. Attachment E must include description of efforts made to locate the "lost" wells.
  - One or more wells will be transferred to another owner upon case closure being granted. Attachment E should include documentation identifying the name, address and email for the new owner(s).
  - One or more wells will remain in use at the site after this closure. Attachment E must include documentation as to the reason(s) the well(s) will remain in use.

**Notifications to Owners of Impacted Properties (Attachment F)**

If any section is not relevant to the case closure request, you must fully explain the reasons why and attach that explanation to the relevant section of the form. All information submitted shall be legible. Providing illegible information may result in a submittal being considered incomplete until corrected.

**General Directions:**

- State law requires that the responsible party provide a 30-day, written advance notice (i.e., a letter) to certain persons prior to applying for case closure. This requirement applies if: (1) the person conducting the response action does not own the source property; (2) the contamination has migrated onto another property; and/or (3) one or more monitoring wells will not be abandoned.
- A model "template letter" for these mandatory notifications can be downloaded at: <http://dnr.wi.gov/files/PDF/pubs/rr/RR919.pdf>.

**Check all that apply to the site-specific circumstances of this case closure:**

	<b>A. Impacted Source Property and Owner is not Conducting Cleanup</b>	<b>B. Impacted Right of Way</b>	<b>C. Impacted Off-Site Property Owner</b>	<b>Impacted Property Notification Situations: Ch. NR 726 Appendix A Letter</b>
1.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Residual groundwater contamination exceeds Ch. NR 140 Wis. Administrative Code enforcement standards.
2.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Residual soil contamination that attains or exceeds standards is present after the remedial action is complete, and must be properly managed should it be excavated or removed.
3.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	An engineered cover or a soil barrier (e.g. pavement) must be maintained over contaminated soil for direct contact or groundwater infiltration concerns.
4.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Industrial land use soil standards were used for the clean-up standard.
5.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	A vapor mitigation system (or other specific vapor protection) must be operated and maintained.
6.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Vapor assessment needed if use changes.
7.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Structural impediment.
8.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Lost, transferred or open monitoring wells.
9.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Not Applicable.

If any of the previous boxes in rows 1 thru 8 were checked, include the following as part of Attachment F:

- FORM 4400-246;
- Copy of each letter sent, 30 days or more prior to requesting closure; and
- Proof of receipt for each letter.
- For this site closure, 5 (number) property (ies) has/have been impacted, the owners have been notified, and copies of the letters and receipts are included in Attachment F.

**Source Legal Documents (Attachment G)**

If any section is not relevant to the case closure request, you must fully explain the reasons why and attach that explanation to the relevant section of the form. All information submitted shall be legible. Providing illegible information may result in a submittal being considered incomplete until corrected.

Include all of the following documents, in this order, in Attachment G:

- G.1. **Deeds - Source Property and Other Impacted Properties:** The most recent deed with legal descriptions clearly labeled for (1) the **Source Property** (where the contamination originated) and (2) all **off-source** (off-site) properties where letters were required to be sent per the ch. NR 700, Wis. Adm. Code, rule series (e.g., off-site cover maintenance required, lost monitoring well, off-site cover property impacts to groundwater exceeding the ch. NR 140, Wis. Adm. Code).  
*Note: If a property has been purchased with a land contract and the purchaser has not yet received a deed, a copy of the land contract which includes the legal description shall be submitted instead of the most recent deed. If the property has been inherited, written documentation of the property transfer should be submitted along with the most recent deed.*
- G.2. **Certified Survey Map:** A copy of the certified survey map or the relevant section of the recorded plat map for those properties where the legal description in the most recent deed refers to a certified survey map or a recorded plat map. (Lots on subdivided or platted property (e.g. lot 2 of xyz subdivision)).
- G.3. **Verification of Zoning:** Documentation (e.g., official zoning map or letter from municipality) of the property's or properties' current zoning status.
- G.4. **Signed Statement:** A statement signed by the Responsible Party (RP), which states that he or she believes that the attached legal description(s) accurately describe(s) the correct contaminated property or properties.

**Signatures and Findings for Closure Determination**

If any section is not relevant to the case closure request, you must fully explain the reasons why and attach that explanation to the relevant section of the form. All information submitted shall be legible. Providing illegible information may result in a submittal being considered incomplete until corrected.

Check the correct signature block below for this case closure request, and have the proper environmental professional(s) sign this document, in accordance with the ch. NR 700 Wis. Adm. Code rule series. Both boxes may be checked if applicable to this case closure.

- A response action(s) for this site addresses groundwater contamination (including natural attenuation remedies). In this situation, the closure request must be prepared by, or under the supervision of, a professional engineer and a hydrogeologist, as defined in ch. NR 712, Wis. Adm. Code. Include both signatures provided below with the submittal.
  
- The response action(s) for this site addresses media other than groundwater. In this situation, the case closure request must be prepared by, or under the supervision of, a professional engineer, as defined in ch. NR 712, Wis. Adm. Code. The "engineering certification" language below, at a minimum, must be signed.

**Engineering Certification**

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

Vasanta M. Kalluri

Printed Name

Senior Environmental Engineer

Title

*Vasanta Kalluri*

Signature

3/28/13

Date



P.E. Stamp and Number

**Hydrogeologist Certification**

I, Dennis Lawton hereby certify that I am a hydrogeologist as that term is defined in s. NR 712.03 (1), Wis. Adm. Code, and that, to the best of my knowledge, all of the information contained in this case closure request is correct and the document was prepared in compliance with all applicable requirements in chs. NR 700 to 726, Wis. Adm. Code. All phases of work necessary to address groundwater contamination including obtaining data, developing conclusions, recommendations and preparing submittals for this case closure request have been prepared by me, or their preparation has been supervised by me. Specifically, with respect to compliance with the rules, in my professional opinion a site investigation has been conducted in accordance with ch. NR 716, Wis. Adm. Code, and all necessary remedial actions have been completed in accordance with chs. NR 140, NR 718, NR 720, NR 722, NR 724 and NR 726, Wis. Adm. Codes."

Dennis R. Lawton

Printed Name

Senior Hydrogeologist

Title

*Dennis Lawton*

Signature

3/28/13

Date

**ATTACHMENT A – TABLES**

Table A.1(a) Groundwater Analytical Table (Permanent Wells)

Table A.1(b) Groundwater Analytical Table (Temporary Borings)

Table A.2 Pre-Remedial Soil Analytical Results

Table A.3 Post Remedial Soil Analytical Table

Table A.4 Remaining Soil Exceedence Table

Table A.5(a) Vapor Analytical Table

Table A.5(b) Vapor Analytical Table - Field Screening Readings on Samples of Extracted Gas

Table A.5(c) Vapor Analytical Table - Vacuum and Field Screening Readings at Communication Test Points

Table A.5(d) Vapor Analytical Table - Vapor Extraction Points PID Screening Results

Table A.5(e) Vapor Analytical Table - Summary of Transient Response Analysis

Table A.6 Other Media of Concern

Table A.7 Water Level Elevations

Table A.8 SVE Emissions Information

**Table A.1(a) Groundwater Analytical Table (Permanent Wells)**

VPLE Case Closure Request

Former Paragon Electric Company

Two Rivers, Wisconsin

WDNR BRRTS No. 02-36-000153; AECOM Project No. 60236613

Well ID	Date Sampled	TCE ug/L	1,2-DCE cis ug/L	PCE ug/L	Vinyl Chloride ug/L
MW-1	09/11/91	30.1	3.79	<0.5	1.51
	01/16/92	31.6	9.4	<0.5	52.3 (1)
	07/30/92	74.6 (2)	8.5 (2)	<0.5	3
	09/03/92	70.6	5.3	<2.5	1
	01/22/93	47.5	8.1 (4)	<2.5	<1.0
	07/06/93	36.4	5.5	0.9	<0.2
	03/24/94	34.0 (4)	38.4	<0.5	<0.2
	09/29/94	235	<0.2	0.7	<0.2
	03/23/95	1490	281	<50	<20
	09/06/95	984	265	<50	<20
	09/25/96	266	NA	<0.9	<1.3
	03/27/97	91	NA	0.4 (9)	<0.1
	09/29/97	260	14	0.64	<0.045
	03/17/98	44.2	<2	<1	<0.2
	09/29/98	45.6	<10	<5	<1
	07/28/99	2.1	1.5	<0.34	<0.14
	12/22/99	24	7	<0.34	<0.14
10/26/11	1.0	<0.83	<0.45	<0.18	
02/11/13	0.70 (j)	<0.83	<0.45	<0.18	
P-1	09/11/91	2.38	<1.0	<0.5	<0.2
	01/16/92	0.3	<1.0	<0.5	<0.2
	07/30/92	0.3	<1.0	<0.5	<0.2
	01/22/93	<0.2	<0.5	<0.5	<0.2
	07/06/93	<0.5	<0.5	<0.5	<0.2
	03/24/94	0.8 (4)	<0.5	<0.5	<0.2
	09/29/94	<0.2	<0.5	<0.5	<0.2
	03/23/95	<0.2	<0.5	<0.5	<0.2
	09/06/95	<0.5	<0.5	<0.5	<0.2
	09/25/96	<0.7	NA	<0.9	<1.3
	03/27/97	<0.2	NA	<0.2	<0.1
	09/29/97	<0.13	<0.32	<0.13	<0.045
	03/17/98	<0.5	<1	<1	<0.2
	09/29/98	<0.5	<2	<1	<0.2
	07/28/99	<0.21	<0.19	<0.34	<0.14
	12/22/99	<0.21	<0.19	<0.34	<0.14
	MW-2	09/11/91	114	25.66	0.75
01/16/92		130	13.1	<2.5	<1.0
07/30/92		226	72.9	0.7	0.4
01/22/93		544	279 (4)	<12.5	<5.0
07/06/93		121	<12.5	<12.5	<5.0
03/24/94		76.3 (4)	1.9	<0.5	<0.2
09/29/94		518	6.5	0.6	<0.2
03/23/95		533 (4)	<50	<50	<20
09/06/95		482	15.5	<10	<4
09/25/96		1530	NA	2.5	<1.3
03/27/97		1120	NA	2.7	<0.1
06/17/97		550	37	1.1	<0.045
09/29/97		1000	120	2.3	<0.045
12/29/97		740	15	2.3	<0.045
03/17/98		560	28.9	1.62	<0.2
09/29/98		472	<40	<20	<4
07/28/99		75	14	0.89	<0.14
12/22/99	108	22	<17	<7	
10/26/11	1.2	<0.83	<0.45	<0.18	
02/11/13	2.1	<0.83	<0.45	<0.18	
MW-3	09/11/91	<0.2	<1.0	<0.5	<0.2
	03/24/94	1.1 (4)	<1.0	<0.5	<0.2
WI Admn. Code NR140 ES		5	70	5	0.2
WI Admn. Code NR 140 PAL		0.5	7	0.5	0.02

### Table A.1(a) Groundwater Analytical Table

VPLE Case Closure Request

Former Paragon Electric Company

Two Rivers, Wisconsin

WDNR BRRTS No. 02-36-000153; AECOM Project No. 60236613

Well ID	Date Sampled	TCE ug/L	1,2-DCE cis ug/L	PCE ug/L	Vinyl Chloride ug/L
MW-4	09/11/91	<b>667500</b>	<500	<b>1675</b>	<100
	01/16/92	<b>385000</b>	<40000	<20000	<8000
	07/30/92	<b>20.9</b>	1.6	<b>0.6</b>	<0.2
	10/26/11	<b>483</b>	56.2	<2.2	<b>6.5</b>
	02/11/13	<b>63.1</b>	10.6	<0.45	<b>2.7</b>
PZ-4A	09/11/91	<b>689</b>	<1.0	<b>15.4</b>	<0.2
	01/16/92	<b>3370</b>	<b>574</b>	<b>12.9</b>	<5.0
	07/30/92	<b>8.5</b>	<b>238</b>	<0.5	<b>5.6</b>
	01/22/93	2.8	<b>99 (4)</b>	<5.0	<b>3.7 (4)</b>
	07/06/93	4.8	21.6	<0.5	<b>10.2</b>
	03/24/94	1.7 (4)	3.0	<0.5	<b>2.3</b>
	09/29/94	0.3	1.2	<0.5	<b>1.7</b>
	03/23/95	0.32	<2	<0.5	<b>1.7</b>
	09/06/95	<25	<25	<25	<10
	03/27/96	0.32	<2	<0.5	<b>1.7</b>
	09/25/96	2	NA	<0.9	<1.3
	03/27/97	0.5 (9)	NA	<0.2	<0.1
	09/29/97	1.1	0.43	<0.13	<b>0.28</b>
	03/17/98	<0.5	<2	<1	<b>0.309</b>
	09/29/98	1.03	<2	<1	<b>1.77</b>
	07/28/99	<0.21	<0.19	<0.34	<0.14
	12/22/99	<0.21	<0.19	<0.34	<0.14
EXT-4B	02/03/92	<b>58900</b>	<b>230</b>	<b>265</b>	<20
	07/30/92	<b>52.3</b>	28.2	<0.5	<b>3</b>
	10/15/92	<b>10.4</b>	12.1	<0.5	<b>2.1</b>
	01/22/93	<b>246 (4)</b>	13.7 (4)	<2.5	<b>3.3 (4)</b>
	04/14/93	<b>5.5</b>	12	<0.5	<b>2.4</b>
	07/06/93	<b>67.6</b>	7.5	<0.5	<0.2
	11/17/93	<b>49.4</b>	6.2	<0.5	<b>1.3</b>
	02/03/94	<b>209</b>	10.4	<b>7.8</b>	<b>1.4</b>
	03/24/94	<b>20.5</b>	17.1	<0.5	<b>0.3</b>
	05/24/94	<b>174 (7)</b>	12.4	<b>8.2</b>	<b>0.9</b>
	06/30/94	<b>169</b>	7.6	<b>12.7</b>	<1
	10/03/94	<0.2	<0.5	<0.5	<0.2
	01/23/95	<b>15.8</b>	5.5	3.2	<0.2
	03/23/95	<b>51 (4)</b>	9.5	<b>5.4</b>	<1
	09/12/95	<b>16.5</b>	4.06	1.67	<b>2.33</b>
	01/08/96	<b>31.1</b>	3.25	1.64	<0.2
	03/27/96	<b>14</b>	NA	1.4	<1.3
	07/10/96	<b>10</b>	NA	1	<b>1.8</b>
	09/25/96	<b>31</b>	NA	3	<b>5.2</b>
	12/18/96	<b>22</b>	NA	3.5	<b>4.7</b>
	03/27/97	<b>5.6</b>	NA	0.7 (9)	<0.1
	06/17/97	<b>26</b>	13	4.3	<b>4.2</b>
	09/29/97	2.2	3.3	0.32 (9)	<b>3.1</b>
	12/29/97	0.95	2.9	0.19 (9)	<b>2.2</b>
	04/07/98	<b>15.4</b>	2.78	<1	<b>1.32</b>
	06/23/98	<b>5.25</b>	2.95	<1	<b>1.61</b>
	09/29/98	<b>23.4</b>	7.16	<1	<b>1.31</b>
	12/02/98	3.4	3.25	<1	<b>1.36</b>
	03/26/99	2.13	2.2	<0.34	<b>0.98</b>
07/28/99	<b>68</b>	11	<0.34	<0.14	
09/29/99	<21	<19	<34	<14	
03/08/00	1.1	2.1	<0.14	<b>0.49</b>	
06/15/00	0.75	1.2	<0.14	<b>0.35</b>	
10/03/00	0.52	0.92	<0.14	<0.23	
10/18/01	1.7	0.88	<0.14	<0.23	
02/28/03	3.9	<0.81	<0.63	<b>0.89</b>	
02/11/13	0.63 (j)	1.2	<0.45	<0.18	
<b>WI Admn. Code NR140 ES</b>		<b>5</b>	<b>70</b>	<b>5</b>	<b>0.2</b>
<b>WI Admn. Code NR 140 PAL</b>		<b>0.5</b>	<b>7</b>	<b>0.5</b>	<b>0.02</b>

### Table A.1(a) Groundwater Analytical Table

VPLE Case Closure Request

Former Paragon Electric Company

Two Rivers, Wisconsin

WDNR BRRTS No. 02-36-000153; AECOM Project No. 60236613

Well ID	Date Sampled	TCE ug/L	1,2-DCE cis ug/L	PCE ug/L	Vinyl Chloride ug/L
MW-5	09/11/91	<b>1010</b>	<b>80.2</b>	<b>2</b>	<b>21.1</b>
	01/16/92	<b>1760</b>	<50	<25	<10
	07/30/92	<b>1.4</b>	<0.5	<0.5	<0.2
	01/22/93	<b>7</b>	<b>3.1 (4)</b>	<0.5	<0.2
	07/06/93	<b>2.9</b>	<b>2.4</b>	<0.5	<0.2
	03/24/94	<b>5.8 (4)</b>	<b>6.2</b>	<0.5	<0.2
	09/29/94	<b>2.5</b>	<b>2.4</b>	<5	<b>1.8</b>
	03/23/95	<b>1.5</b>	<b>17.7</b>	<0.5	<b>34.4</b>
	09/06/95	<b>6.35</b>	<b>21.6</b>	<0.5	<b>16.5</b>
	09/25/96	<b>6.4</b>	NA	<0.9	<b>2.1</b>
	03/27/97	<b>6.4</b>	NA	<0.2	<0.1
	09/29/97	<b>3.6</b>	<b>7.5</b>	<0.13	<b>4.7</b>
	03/17/98	<b>5.62</b>	<b>14.1</b>	<1	<b>5.97</b>
	09/29/98	<b>2.36</b>	<b>3.7</b>	<1	<b>0.574</b>
	07/28/99	<b>3.3</b>	<b>3.1</b>	<0.34	<0.14
	12/22/99	<b>1.2</b>	<b>9.9</b>	<0.34	<0.14
MW-6 (EXT-6)	09/11/91	<b>35020</b>	<b>982</b>	<b>99.3</b>	<b>16.3</b>
	02/03/92	<b>47800</b>	<b>2080</b>	<100	<400
	09/03/92	<b>7184</b>	<b>977</b>	<25	<b>14.2</b>
	10/15/92	<b>31300</b>	<b>1590</b>	<1000	<400
	01/22/93	<b>13300 (3)</b>	<b>950 (4)</b>	<10	<b>12.2</b>
	04/14/93	<b>6110</b>	<b>405</b>	<250	<100
	07/06/93	<b>6160</b>	<b>673</b>	<50	<20
	11/17/93	<b>4000</b>	<b>365</b>	<125	<50
	02/03/94	<b>3170</b>	<b>333</b>	<125	<50
	03/24/94	<b>3340 (4)</b>	<b>294</b>	<62.4	<25
	05/24/94	<b>2290</b>	<b>149</b>	<10	<4
	06/30/94	<b>1740</b>	<b>134</b>	<50	<20
	09/29/94	<b>1750</b>	<b>159</b>	<50	<20
	12/20/94	<b>761</b>	<b>211</b>	<b>3.8</b>	<b>5</b>
	03/23/95	<b>1460</b>	<b>213</b>	<50	<20
	09/12/95	<b>847</b>	<b>265</b>	<10	<4
	01/02/96	<b>553</b>	<b>17.1</b>	<12.5	<5
	03/27/96	<b>595</b>	NA	<b>2.5</b>	<b>3.6</b>
	07/10/96	<b>386</b>	NA	<b>3</b>	<b>4.1</b>
	09/25/96	<b>436</b>	NA	<b>2</b>	<b>3.8</b>
	12/18/96	<b>476</b>	NA	<23	<33
	03/27/97	<b>382</b>	NA	<b>2.2</b>	<0.1
	06/17/97	<b>140</b>	<b>79</b>	<b>2.2</b>	<b>7.2</b>
	09/29/97	<b>240</b>	<b>110</b>	<b>2.5</b>	<b>3.2</b>
	12/29/97	<b>280</b>	<b>160</b>	<b>1.5</b>	<b>3.9</b>
	04/07/98	<b>93.3</b>	<b>52.7</b>	<b>1.78</b>	<b>9.35</b>
	06/23/98	<b>141</b>	<b>77.8</b>	<20	<4
	09/29/98	<b>112</b>	<b>63.2</b>	<b>1.75</b>	<b>2.69</b>
	12/02/98	<b>95</b>	<b>60</b>	<5	<b>1.38</b>
	03/26/99	<b>98</b>	<b>79.5</b>	<b>1.3</b>	<b>4.42</b>
	07/28/99	<b>116</b>	<b>36</b>	<b>1.6</b>	<b>5.8</b>
	09/29/99	<b>169</b>	<b>75</b>	<b>33</b>	<7
03/08/00	<b>67</b>	<b>65</b>	<7.1	<12	
06/15/00	<b>66</b>	<b>34</b>	<7.1	<12	
10/03/00	<b>50</b>	<b>30</b>	<b>1.5</b>	<1.2	
10/18/01	<b>91</b>	<b>60</b>	<b>1.4</b>	<b>4.4</b>	
06/10/02	<b>37</b>	<b>48</b>	<4.9	<b>3.1(j)</b>	
02/28/03	<b>83</b>	<b>59</b>	<b>1.4</b>	<b>15</b>	
10/26/11	<b>30.4</b>	<b>6</b>	<b>1.7</b>	<b>2.2</b>	
02/11/13	<b>15.8</b>	<b>2.2</b>	<b>1.1</b>	<b>1.9</b>	
<b>WI Admn. Code NR140 ES</b>		<b>5</b>	<b>70</b>	<b>5</b>	<b>0.2</b>
<b>WI Admn. Code NR 140 PAL</b>		<b>0.5</b>	<b>7</b>	<b>0.5</b>	<b>0.02</b>



### Table A.1(a) Groundwater Analytical Table

VPLE Case Closure Request

Former Paragon Electric Company

Two Rivers, Wisconsin

WDNR BRRTS No. 02-36-000153; AECOM Project No. 60236613

Well ID	Date Sampled	TCE ug/L	1,2-DCE cis ug/L	PCE ug/L	Vinyl Chloride ug/L
PZ-6A	09/11/91	<b>15.3</b>	<1.0	<0.5	<b>10.4</b>
	01/16/92	2.5	<1.0	<0.5	<b>14.5 (1)</b>
	07/30/92	1.1	<0.5	<0.5	<b>1.3</b>
	01/22/93	0.3	<0.5	<0.5	<b>1.4 (4)</b>
	07/06/93	<0.2	<0.5	<0.5	<b>0.7</b>
	03/24/94	<0.2	<0.5	<0.5	<b>0.2</b>
	09/29/94	<0.2	<0.5	<0.5	<0.2
	03/23/95	<0.2	<0.5	<0.5	<0.2
	09/06/95	<0.2	<0.5	<0.5	<0.2
	09/25/96	<0.7	NA	<0.9	<1.3
	03/27/97	<0.19	NA	<0.24	<0.15
	09/29/97	<0.13	<0.32	<0.13	<0.045
	03/17/98	<b>58.9</b>	<20	<10	<2
	09/29/98	<0.5	<2	<1	<0.2
	07/28/99	<0.21	<0.19	<0.34	<0.14
	12/22/99	<0.21	<0.19	<0.34	<0.14
PZ-7	09/11/91	<b>15297</b>	<b>4433</b>	<b>16.9</b>	<b>157</b>
	01/16/92	<b>170000</b>	<b>9650</b>	<250	<100
	09/03/92	<b>108000</b>	<b>7180</b>	<2500	<1000
	01/22/93	<b>71000 (5)</b>	<b>8689 (4)</b>	<50	<b>31 (4)</b>
	03/11/93	<b>136000</b>	<b>11900</b>	<1000	<400
	07/06/93	<b>117000</b>	<b>7380</b>	<1000	<400
	03/24/94	<b>88100</b>	<b>6935 (4)</b>	<50	<b>40.6 (4)</b>
	06/30/94	<b>73300</b>	<b>3140</b>	<1000	<400
	09/29/94	<b>60500</b>	<b>8510</b>	<1000	<400
	12/20/94	<b>111600</b>	<b>8731</b>	<1000	<200
	03/23/95	<b>76900</b>	<b>3700</b>	<2500	<1000
	06/21/95	<b>108000</b>	<5000	<50	<20
	09/06/95	<b>109000</b>	<2500	<2500	<1000
	01/02/96	<b>70000</b>	<b>8600</b>	<2500	<1000
	03/27/96	<b>66600</b>	NA	<0.9	<b>9.6</b>
	07/02/96	<b>80100</b>	NA	<90	<130
	09/25/96	<b>66400</b>	NA	<4.5	<b>7.1</b>
	12/18/96	<b>64600</b>	NA	<900	<1300
	03/27/97	<b>35900</b>	NA	<242	<146
	06/17/97	<b>32000</b>	<b>3800</b>	<b>970 (9)</b>	<225
	09/29/97	<b>35000</b>	<b>2800</b>	<26	<9
	12/29/97	<b>27000</b>	<b>3100</b>	<13	<4.5
	03/17/98	<b>4300</b>	<b>2960</b>	<1	<b>10.6</b>
	04/07/98	<b>39200</b>	<b>5210</b>	<1000	<200
	06/23/98	<b>17400</b>	<b>2340</b>	<500	<500
	09/29/98	<b>14700</b>	<b>2640</b>	<200	<40
	12/02/98	<b>12700</b>	<b>2080</b>	<1000	<200
	07/28/99	<b>7850</b>	<b>2060</b>	<0.34	<b>12</b>
	09/29/99	<b>6670</b>	<b>2150</b>	<168	<70
	12/22/99	<b>5070</b>	<b>1720</b>	<168	<70
	03/08/00	<b>836</b>	<b>1130</b>	<0.14	<b>19</b>
	06/15/00	<b>3140</b>	<b>4790</b>	<7.1	<12
10/03/00	<b>1850</b>	<b>8820</b>	<14	<23	
10/18/01	<b>72</b>	<b>7380</b>	<14	<b>107</b>	
06/10/02	<37	<b>2600</b>	<25	<b>490</b>	
02/28/03	<b>22</b>	<b>1200</b>	<6.3	<b>320</b>	
12/22/03	<b>9.3</b>	<b>540</b>	<2.2	<b>270</b>	
04/14/04	<b>13</b>	<b>410</b>	<1.1	<b>210</b>	
01/19/05	<b>9.4</b>	<b>110</b>	<0.45	<b>84</b>	
04/26/05	<b>7.4</b>	<b>60</b>	<0.45	<b>65</b>	
<b>WI Admn. Code NR140 ES</b>		<b>5</b>	<b>70</b>	<b>5</b>	<b>0.2</b>
<b>WI Admn. Code NR 140 PAL</b>		<b>0.5</b>	<b>7</b>	<b>0.5</b>	<b>0.02</b>

### Table A.1(a) Groundwater Analytical Table

VPLE Case Closure Request

Former Paragon Electric Company

Two Rivers, Wisconsin

WDNR BRRTS No. 02-36-000153; AECOM Project No. 60236613

Well ID	Date Sampled	TCE ug/L	1,2-DCE cis ug/L	PCE ug/L	Vinyl Chloride ug/L
MW-8	09/11/91	<b>787</b>	28.4	1.96	<0.2
	01/16/92	<b>568</b>	<25	<12.5	<5.0
	07/30/92	<b>490</b>	15.7	1.5	<0.2
	01/22/93	<b>563</b>	<10	<10	<4
	07/06/93	<b>189</b>	<2.5	<2.5	<1
	03/24/94	<b>73.8 (4)</b>	<0.5	1.2 (4)	<0.2
	09/29/94	<b>230</b>	<0.5	1.1	<0.2
	03/23/95	<b>118</b>	<10	<10	<4
	09/06/95	<b>154</b>	<2.5	<2.5	<1
	09/25/96	<b>76</b>	NA	1.3	<1.3
	03/27/97	<b>30</b>	NA	0.7 (9)	<0.1
	09/29/97	<b>49</b>	0.82	0.77	<0.045
	03/17/98	<b>28.4</b>	<2	<1	<0.2
	09/29/98	<b>36.4</b>	<2	1.06	<0.2
	07/28/99	<b>28</b>	<0.19	0.87	<0.14
	12/22/99	<b>34</b>	<0.19	0.71	<0.14
10/26/11	0.94 (j)	<0.83	0.89 (j)	<0.18	
02/11/13	1.4	<0.83	0.88 (j)	<0.18	
MW-9	09/11/91	<b>54950</b>	<b>569</b>	<b>61.2</b>	<b>3.22</b>
	01/16/92	<b>43700</b>	<1000	<500	<200
	09/03/92	<b>28400</b>	<1000	<1000	<400
	01/22/93	<b>5005 (4)</b>	<b>1167 (4)</b>	<500	<200
	07/06/93	<b>2000</b>	<b>1400</b>	<100	<40
	03/24/94	<b>1274 (4)(2)</b>	<b>135 (4)</b>	<b>13.7 (4)</b>	<0.2
	09/29/94	<b>1410</b>	<b>366</b>	<b>8.8</b>	<0.2
	03/23/95	<b>1010</b>	<b>215</b>	<50	<20
	09/06/95	<b>450</b>	<b>220</b>	<12.5	<5
	09/25/96	<b>319</b>	NA	<b>6.4</b>	<1.3
	03/27/97	<b>225</b>	NA	1.8	<0.1
	09/29/97	<b>110</b>	<b>73</b>	2.4	<0.045
	03/17/98	<b>56.6</b>	31.9	1.05	<0.2
	09/26/98	<b>70.1</b>	22.9	<5	<1
	07/28/99	<b>124</b>	14	1.9	<0.14
	12/22/99	<b>28</b>	22	<1.7	<0.7
10/26/11	<b>13.4</b>	2.8	3.0	<0.18	
02/11/13	<b>8.4</b>	1.7	2.5	<0.18	
MW-11 (Dup)	01/16/92	0.2	<1	<0.5	<b>0.9 (1)</b>
	01/16/92	0.3	<1	<0.5	<b>1.0 (1)</b>
	03/24/94	<b>6.0 (4)</b>	2.8	<0.5	<0.2
	10/26/11	<0.48	<0.83	<0.45	<0.18
<b>WI Admn. Code NR140 ES</b>		<b>5</b>	<b>70</b>	<b>5</b>	<b>0.2</b>
WI Admn. Code NR 140 PAL		0.5	7	0.5	0.02

### Table A.1(a) Groundwater Analytical Table

VPLE Case Closure Request

Former Paragon Electric Company

Two Rivers, Wisconsin

WDNR BRRTS No. 02-36-000153; AECOM Project No. 60236613

Well ID	Date Sampled	TCE ug/L	1,2-DCE cis ug/L	PCE ug/L	Vinyl Chloride ug/L
PZ-13	11/25/92	<b>59.9 (3)</b>	7.3	0.6	<0.2
	01/22/93	<b>90.1</b>	16 (4)	<2.5	<1
	03/11/93	<b>74</b>	12.7	<2.5	<1
	07/06/93	<b>107</b>	24.5	<2.5	<1
	03/24/94	<b>55.2</b>	<0.5	<0.5	<0.2
	06/30/94	<b>51.2</b>	7.6	<2.5	<1
	09/29/94	2.4	<2.5	<2.5	<1
	12/20/94	<b>73.9</b>	14.4	<1	<0.2
	03/23/95	<b>37.6</b>	8	<.5	<0.2
	06/21/95	<b>43.3</b>	6.9	<0.5	<0.2
	09/06/95	<b>41.9</b>	7.01	<2.5	<1
	01/02/96	<b>93.1</b>	12.7	<2.5	<1
	07/02/96	<b>32</b>	NA	<0.9	<1.3
	09/25/96	<b>12</b>	NA	<0.9	<1.3
	12/18/96	<b>27</b>	NA	<1.8	<2.6
	03/27/97	<b>9.8</b>	NA	<0.2	<0.1
	06/17/97	<b>14</b>	2.2	<0.13	<0.045
	09/29/97	2.2	0.84	<0.13	<0.045
	12/29/97	4.5	1.4	<0.13	<0.045
	03/17/98	<b>87</b>	24.2	<1	<0.2
	04/07/98	<b>16.7</b>	2.5	<1	<0.2
	06/23/98	<b>6.9</b>	<2	<1	<0.2
	09/29/98	<b>13.1</b>	2.34	<1	<0.2
	12/02/98	<b>12.1</b>	2.41	<1	<0.2
	07/28/99	<b>40</b>	3.6	<0.34	<0.14
	09/29/99	<b>14</b>	0.49	<0.34	<0.14
	12/22/99	<b>24</b>	2.2	<0.34	<0.14
	03/08/00	<b>178</b>	<93	<71	<117
	06/15/00	<b>1220</b>	<b>561</b>	<36	<59
	10/03/00	<b>9.9</b>	<4.7	<3.6	<5.9
	10/18/01	<b>11</b>	39	<3.6	<5.9
	06/10/02	<b>13</b>	3.1	<0.49	<0.12
02/28/03	<b>11</b>	4.0	<0.63	<0.11	
12/22/03	<b>8.8</b>	4.5	<0.45	<0.18	
04/14/04	<b>7.2</b>	4.2	<0.45	<0.18	
01/19/05	Well cover frozen				
04/26/05	4.2	3.6	<0.45	<0.18	
<b>WI Admn. Code NR140 ES</b>		<b>5</b>	<b>70</b>	<b>5</b>	<b>0.2</b>
<i>WI Admn. Code NR 140 PAL</i>		<i>0.5</i>	<i>7</i>	<i>0.5</i>	<i>0.02</i>

### Table A.1(a) Groundwater Analytical Table

VPLE Case Closure Request

Former Paragon Electric Company

Two Rivers, Wisconsin

WDNR BRRTS No. 02-36-000153; AECOM Project No. 60236613

Well ID	Date Sampled	TCE ug/L	1,2-DCE cis ug/L	PCE ug/L	Vinyl Chloride ug/L
PZ-14	11/10/92	18300	125	<125	<50
	01/22/93	65400 (5)	29300 (4)	<500	<200
	03/11/93	83200	41800	<1000	<400
	07/06/93	70100	20400	<1000	<400
	03/24/94	70441	15100	<50	42.5 (4)
	06/30/94	48400	27200	<250	<100
	09/29/94	99100	22800	<250	<100
	12/20/94	97260	18750	<1000	<200
	03/23/95	94600	18200	<2500	<1000
	06/21/95	97400	18800	<50	<20
	09/06/95	94000	30800	<2500	<1000
	01/02/96	83800	29700	<1250	<500
	03/27/96	106000	NA	<0.9	20
	07/02/96	76800	NA	<90	<130
	09/25/96	104000	NA	<9	47
	12/18/96	356000	NA	<4500	<6500
	02/07/97	107000	NA	<900	<1300
	03/27/97	109000	NA	<605	<365
	06/17/97	87000	19000	<650	<225
	09/29/97	83000	20000	<1300	<450
	12/29/97	110000	22000	<650	<230
	03/17/98	17600	17600	<200	<40
	04/07/98	133000	31200	<5000	<1000
	06/23/98	115000	27600	<1000	<1000
	09/29/98	117000	27900	<1000	<200
	12/02/98	114000	28100	<5000	<1000
	07/28/99	96100	26700	<1680	<700
	09/29/99	86300	27600	<840	<350
	12/22/99	70200	14900	<1680	<700
	03/08/00	98100	35500	<355	<585
06/15/00	70800	15100	<355	<585	
10/03/00	56800	13000	<355	<585	
10/18/01	64400	19500	<355	<585	
06/10/02	54000	14000	<250	<60	
02/28/03	22000	14000	<130	<22	
12/22/03	11000	19000	<45	<18	
04/14/04	9000	17000	180	<18	
PZ-14R	11/02/04	48	1300	<11	<4.5
	01/19/05	<19	3400	<18	<7.2
	04/26/05	<9.6	3000	<9	<3.6
WI Admn. Code NR140 ES		5	70	5	0.2
WI Admn. Code NR 140 PAL		0.5	7	0.5	0.02

### Table A.1(a) Groundwater Analytical Table

VPLE Case Closure Request

Former Paragon Electric Company

Two Rivers, Wisconsin

WDNR BRRTS No. 02-36-000153; AECOM Project No. 60236613

Well ID	Date Sampled	TCE ug/L	1,2-DCE cis ug/L	PCE ug/L	Vinyl Chloride ug/L
EXT-15	02/03/94	76.3	130	<5	3
	03/24/94	108 (4)	141	<2.5	6.3 (4)
	05/24/94	63.5	116	<2.5	<1
	09/29/94	177	365	<2.5	14.2
	02/02/95	28.9 (4)	273	<5	45.4
	09/06/95	13.2	161	<2.5	6.51
	09/25/96	61	NA	<0.9	34
	03/27/97	25	NA	<0.2	<0.1
	09/29/97	27	520	<0.13	32
	03/17/98	129	422	<20	<4
	09/29/98	10.2	569	<20	18.8
	07/28/99	18	491	<0.34	35
	12/22/99	6.3	19	<1.7	<0.7
	11/05/04	<0.48	79	<0.45	120
	01/19/05	<0.96	190	<0.9	77
04/26/05	<0.48	94	<0.45	140	
TW-1 (8)	09/13/94	54600	383	19.1	0.3
	09/29/94	36730	1670	16.1	<0.2
EXT-16	02/02/95	13600	<250	<250	<100
	03/23/95	1370 (4)	<50	<50	<20
	06/21/95	1330	<50	<50	<20
	09/06/95	330	64.5	<25	<10
	01/02/96	19700	261	<250	<100
	03/27/96	11400	NA	13	<1.3
	07/19/96	6390	NA	14	1.4
	09/25/96	3300	NA	12	3.7
	12/18/96	7060	NA	<90	<130
	03/27/97	5080	NA	12	<0.1
	06/17/97	5000	1700	11	2.83
	09/29/97	8000	1400	7.7 (9)	<0.9
	12/29/97	8700	1300	13	1.8
	03/17/98	2080	1050	<50	<10
	06/23/98	4110	1390	<500	<100
	09/29/98	23.4	<10	<5	1.1
	12/10/98	1900	1760	10.3	35.3
	03/26/99	1740	1240	<16.8	<15.6
	07/28/99	257	997	3.1	9.1
	09/29/99	111	1590	<84	<35
	03/08/00	6790	1450	<36	<59
	06/15/00	1840	1330	<36	<59
	10/03/00	1510	1150	86	<59
	10/18/01	808	607	<36	<59
	06/26/02	1500	800	<49	<12
	02/28/03	8.8	530	<3.2	17
12/22/03	180	350	3.8	150	
04/14/04	59	370	1.6	370	
11/05/04	260	530	5.7	130	
01/19/05	270	560	4.2	58	
04/26/05	250	470	0.51	24	
WI Admn. Code NR140 ES		5	70	5	0.2
WI Admn. Code NR 140 PAL		0.5	7	0.5	0.02

## Table A.1(a) Groundwater Analytical Table

VPLE Case Closure Request

Former Paragon Electric Company

Two Rivers, Wisconsin

WDNR BRRTS No. 02-36-000153; AECOM Project No. 60236613

Well ID	Date Sampled	TCE ug/L	1,2-DCE cis ug/L	PCE ug/L	Vinyl Chloride ug/L
PZ-17	11/05/04	<b>17</b>	40	<0.45	<0.18
	01/19/05	1.7	2.3	<0.45	<0.18
	04/26/05	<0.48	<0.83	<0.45	<0.18
PZ-18S	11/02/04	0.78	1.9	<0.45	<0.18
	01/19/05	<0.48	1.1	<0.45	<0.18
	04/26/05	<0.45	<0.83	<0.45	<0.18
PZ-18D	10/15/04	<0.48	1.8	<0.45	<0.18
	10/22/04	<0.2	0.37	<0.1	<0.15
	01/19/05	<0.48	<0.83	<0.45	<0.18
	04/26/05	<0.48	<0.83	<0.45	<0.18
PZ-19	11/05/04	<0.48	<0.83	<0.45	<0.18
	01/19/05	<0.48	<0.83	<0.45	<0.18
	04/26/05	<0.48	<0.83	<0.45	<0.18
IW-1	10/13/04	0.65	26	<0.45	<b>84</b>
	01/19/05	0.68	33	<0.45	<b>110</b>
	04/26/05	<0.48	30	<0.45	<b>120</b>
IW-14	10/13/04	<b>18</b>	32	<0.45	<0.18
	01/19/05	4.4	17	<0.45	<0.18
	04/26/05	1.1	19	<0.45	<0.18
Temp Well -1	10/15/04	<0.48	<0.83	<0.45	<0.18
	10/22/04	<0.2	<0.1	<0.1	<0.15
Temp Well -2	10/15/04	<0.48	<0.83	<0.45	<0.18
	10/22/04	<0.2	<0.1	<0.1	<0.15
<b>WI Admn. Code NR140 ES</b>		<b>5</b>	<b>70</b>	<b>5</b>	<b>0.2</b>
<i>WI Admn. Code NR 140 PAL</i>		<i>0.5</i>	<i>7</i>	<i>0.5</i>	<i>0.02</i>

### Notes:

- (1) Reported as Chloromethane and Vinyl Chloride.
- (2) Compound may be due to carry over.
- (3) Estimated concentration slightly beyond calibration range.
- (4) Reported QC Anomaly - Result may be biased high.
- (5) Sample run after saturated detector - Result may be biased high.
- (6) Reported QC Anomaly - Result may be biased low.
- (7) Reported QC Anomaly.
- (8) TW-1 was abandoned and replaced with EXT-16.
- (9) Reported result is less than the Practical Quantitation Limit (PQL).
- (10) "IW" wells are constructed as injection wells.

NA = Not Analyzed

ES = Enforcement Standards (ES are shown in bold.)

PAL = Preventive Action Limit (PAL exceedences are shown in italics.)

j = above laboratory detection limit, but below laboratory or quantitation limit, or estimated value

**Table A.1(b) Groundwater Analytical Table (Temporary Borings)**

VPLE Case Closure Request  
 Former Paragon Electric Company  
 Two Rivers, Wisconsin  
 WDNR BRRTS No. 02-36-000153; AECOM Project No. 60236613

Sampling Date	NR 140 Standards		SB-6 10/12/09	SB-10R 10/12/09	SB-14 10/12/09
	ES	PAL			
<b>Metals (ug/L)</b>					
Arsenic, Dissolved	<b>10</b>	<i>1</i>	--	--	<1.90
Barium, Dissolved	<b>2000</b>	<i>400</i>	--	--	24
Cadmium, Dissolved	<b>5</b>	<i>0.5</i>	--	--	<0.45
Chromium, Dissolved	<b>100</b>	<i>10</i>	--	--	<b>0.66 J</b>
Lead, Dissolved	<b>15</b>	<i>1.5</i>	--	<1.30	<1.30
Selenium, Dissolved	<b>50</b>	<i>10</i>	--	--	<2.50
Silver, Dissolved	<b>50</b>	<i>10</i>	--	--	<0.47
Mercury, Dissolved	<b>2</b>	<i>0.2</i>	--	--	<0.10
<b>Volatile Organic Compounds (ug/L)</b>					
1,1,1-Trichloroethane	<b>200</b>	<i>40</i>	<0.90	<0.90	<0.90
1,1,1,2-Tetrachloroethane	<b>0.2</b>	<i>0.02</i>	<0.20	<0.20	<0.20
1,1,2-Trichloroethane	<b>5</b>	<i>0.5</i>	<0.42	<0.42	<0.42
1,1-Dichloroethane	<b>850</b>	<i>85</i>	<0.75	<0.75	<0.75
1,1-Dichloroethene	<b>7</b>	<i>0.7</i>	<0.57	<0.57	<0.57
1,2-Dichloroethane	<b>5</b>	<i>0.5</i>	<0.36	<0.36	<0.36
1,2-Dichloropropane	<b>5</b>	<i>0.5</i>	<0.49	<0.49	<0.49
2-Butanone (MEK)	--	--	--	<4.30	<4.30
2-Hexanone	--	--	--	<2.00	<2.00
4-Methyl-2-pentanone (MIBK)	--	--	--	<1.20	<1.20
Acetone	--	--	--	<5.00	<5.00
Benzene	<b>5</b>	<i>0.5</i>	<0.41	<0.41	<0.41
Bromodichloromethane	--	--	<0.56	<0.56	<0.56
Bromoform	<b>4.4</b>	<i>0.44</i>	<0.94	<0.94	<0.94
Bromomethane	<b>10</b>	<i>1</i>	<0.91	<0.91	<0.91
Carbon disulfide	--	--	--	<0.66	<0.66
Carbon tetrachloride	<b>5</b>	<i>0.5</i>	<0.49	<0.49	<0.49
Chlorobenzene	<b>100</b>	<i>20</i>	<0.41	<0.41	<0.41
Chloroethane	<b>400</b>	<i>80</i>	<0.97	<0.97	<0.97
Chloroform	<b>6</b>	<i>0.6</i>	<1.30	<1.30	<1.30
Chloromethane	<b>3</b>	<i>0.3</i>	<0.24	<0.24	<0.24
Dibromochloromethane	<b>60</b>	<i>6</i>	<0.81	<0.81	<0.81
Ethylbenzene	<b>700</b>	<i>140</i>	<0.54	<0.54	<b>1.90</b>
Methyl-tert-butyl ether	<b>60</b>	<i>12</i>	<0.61	<0.61	<0.61
Methylene Chloride	<b>5</b>	<i>0.5</i>	<0.43	<0.43	<0.43
Styrene	<b>100</b>	<i>10</i>	<0.86	<0.86	<0.86
Tetrachloroethene	<b>5</b>	<i>0.5</i>	<0.45	<0.45	<0.45
Toluene	<b>1000</b>	<i>200</i>	<0.67	<0.67	<0.67
Trichloroethene	<b>5</b>	<i>0.5</i>	<0.48	<b>3.80</b>	<0.48
Vinyl chloride	<b>0.2</b>	<i>0.02</i>	<0.18	<0.18	<0.18
cis-1,2-Dichloroethene	<b>70</b>	<i>7</i>	<0.83	<0.83	<b>3.40</b>
cis-1,3-Dichloropropene	<b>0.2</b>	<i>0.02</i>	<0.20	<0.20	<0.20
m&p-Xylene	<b>10,000</b>	<i>1000</i>	<1.8	<1.8	<b>4.90</b>
o-Xylene	<b>10,000</b>	<i>1000</i>	<0.83	<0.83	<0.83
trans-1,2-Dichloroethene	<b>100</b>	<i>20</i>	<0.89	<0.89	<0.89
trans-1,3-Dichloropropene	<b>0.2</b>	<i>0.02</i>	<0.19	<0.19	<0.19
<b>Polycyclic Aromatic Hydrocarbons (ug/L)</b>					
Acenaphthene	--	--	<0.0045	--	--
Acenaphthylene	--	--	<0.0036	--	--
Anthracene	<b>3000</b>	<i>600</i>	<0.0057	--	--
Benzo(a)anthracene	--	--	<0.0036	--	--
Benzo(a)pyrene	<b>0.2</b>	<i>0.02</i>	<0.0029	--	--
Benzo(b)fluoranthene	<b>0.2</b>	<i>0.02</i>	<0.0034	--	--
Benzo(g,h,i)perylene	--	--	<0.0048	--	--
Benzo(k)fluoranthene	--	--	<0.0044	--	--
Chrysene	<b>0.2</b>	<i>0.02</i>	<0.0035	--	--
Dibenz(a,h)anthracene	--	--	<0.0032	--	--
Fluoranthene	<b>400</b>	<i>80</i>	<0.0044	--	--
Fluorene	<b>400</b>	<i>80</i>	<0.0048	--	--
Indeno(1,2,3-cd)pyrene	--	--	<0.0047	--	--
Naphthalene	<b>40</b>	<i>8</i>	<b>0.014 J</b>	--	--
Phenanthrene	--	--	<0.0081	--	--
Pyrene	<b>250</b>	<i>50</i>	<0.0047	--	--
Cyanide (ug/L)	<b>200</b>	<i>40</i>	--	--	< 8

**Notes:**

-- = not available for standards and not analyzed for results

**ES = Enforcement Standard (ES exceedences are shown in bold.)**

*PAL = Preventive Action Limit (PAL Exceedences are shown in italics.)*

ug/L = micrograms per liter



















**Table A.4 Remaining Soil Exceedence Table**

VPLE Case Closure Request

Former Paragon Electric Company

Two Rivers, Wisconsin

WDNR BRRTS No. 02-36-000153; AECOM Project No. 60236613

Sampling Date	WDNR Generic RCLs for Direct				Paint Area		Press Area		Storage Area					
	Non-Industrial		Industrial		Soil to Groundwater RCL	CS-2 0.5-4'	CS-2 4-6'	CS-4 0.5-4.0'	CS-4 4-5.5'	CS-6 0.5-4.0'	CS-7 0.5-4.0'	CS-8 0.5-4.0'	CS-8 4-6'	
						02/06/13	02/06/13	02/06/13	02/06/13	02/06/13	02/06/13	02/06/13	02/06/13	
<b>VOCs (ug/kg)</b>														
Methylene Chloride	60,700	<sup>B</sup>	1,070,000	<sup>B</sup>	2.6	<sup>B</sup>	<25.0	<25.0	<25.0	<25.0	<25.0	<b>52.1 J</b>	<b>34.0 J</b>	<b>27.1 J</b>
Tetrachloroethene	30,700	<sup>B</sup>	153,000	<sup>B</sup>	4.5	<sup>B</sup>	<25.0	<25.0	<25.0	<25.0	<25.0	<b>33.7 J</b>	<25.0	<25.0
Trichloroethene	644	<sup>B</sup>	8,810	<sup>B</sup>	3.6	<sup>B</sup>	<b>73.4</b>	<25.0	<b>121</b>	<b>41.8 J</b>	<b>32.1 J</b>	<b>39.2 J</b>	<25.0	<25.0

**Notes:**

**25** Indicates Non-Industrial Direct Contact RCL exceedance

**50** Indicates Industrial Direct Contact RCL exceedance

**5** Indicates Soil to Groundwater RCL exceedance

-- = not analyzed OR not available

<sup>A</sup> Generic RCL is established under NR 720 or NR 746

<sup>B</sup> WDNR RR Program's RCL Spreadsheet, May 2012 (based on EPA web calculator at <http://epa-prgs.ornl.gov/cgi-bin/chemicals/csi-seach>)

J = above laboratory detection limit, but below laboratory quantitation limit, or estimated value





## Table A.5(b) Vapor Analytical Table

### Field Screening Readings on Samples of Extracted Gas

VPLE Case Closure Request

Former Paragon Electric Company

Two Rivers, Wisconsin

WDNR BRRTS No. 02-36-000153; AECOM Project No. 60236613

Location	Time	Elapsed Time (min)	Cumulative Volume Removed (L)	VOCs by PID (ppm <sub>v</sub> )	O <sub>2</sub> (%)	CO <sub>2</sub> (%)
HPV-1	10:15	0.25	0	12.3	18.5	2.5
Extraction Velocity: 1,100 ft/min	10:23	8	0	10.9	18.7	2.4
Extraction Vacuum: 56 in H <sub>2</sub> O	10:30	15	0	10.7	19.0	2.2
Extraction Flow Rate: 22 scfm	10:50	35	0	7.5	19.5	1.6
Specific Capacity: 0.4 scfm/in H <sub>2</sub> O	11:05	50	0	5.8	19.5	1.4
HPV-2	9:50	0.25	0	1.7	-	-
Extraction Velocity: 1,200 ft/min	9:55	5	0	1.8	-	-
Extraction Vacuum: 50.5 in H <sub>2</sub> O	10:00	10	0	1.8	-	-
Extraction Flow Rate: 24 scfm	10:10	20	0	1.8	11.2	8.4
Specific Capacity: 0.5 scfm/in H <sub>2</sub> O	10:25	35	0	1.7	11.0	8.2
	11:05	75	0	1.5	10.1	8.8
	11:30	100	0	1.7	11.0	8.0
HPV-3	8:18	3	0	0.0	18.6	2.7
Extraction Velocity: 1,500 ft/min	8:30	12	0	0.0	19.1	2.4
Extraction Vacuum: 46 in H <sub>2</sub> O	8:40	22	0	0.0	19.4	2.1
Extraction Flow Rate: 31 scfm	9:00	45	0	0.0	19.4	1.8
Specific Capacity: 0.7 scfm/in H <sub>2</sub> O						
HPV-4	12:50	0.5	0	1.8	19.4	1.7
Extraction Velocity: 1,050 ft/min	12:58	8	0	1.6	19.5	1.7
Extraction Vacuum: 50 in H <sub>2</sub> O	13:03	13	0	1.5	19.7	1.5
Extraction Flow Rate: 21 scfm	13:15	25	0	1.1	20.1	1.3
Specific Capacity: 0.4 scfm/in H <sub>2</sub> O	13:30	40	0	1.6	19.8	1.6
	14:25	95	0	1.3	20.1	1.0
HPV-5	15:32	2	0	1.9	20.0	1.3
Extraction Velocity: 1,100 ft/min	15:43	13	0	1.7	20.1	1.3
Extraction Vacuum: 50 in H <sub>2</sub> O	16:05	35	0	1.6	20.1	1.4
Extraction Flow Rate: 22 scfm	16:30	60	0	1.8	20.0	1.3
Specific Capacity: 0.4 scfm/in H <sub>2</sub> O	16:55	85	0	1.8	20.1	1.3

#### Notes:

1. The data included on this table has been provided by Geosytec Consultants.

- measurement not collected

min - minutes

L - liters

PID - photoionization detector

ppm<sub>v</sub> - parts per million by volume

in H<sub>2</sub>O - inches of water

scfm - standard cubic feet per minute

ft/min - feet per minute

VOCs - volatile organic compounds

O<sub>2</sub> - oxygen

CO<sub>2</sub> - carbon dioxide

## Table A.5(c) Vapor Analytical Table

### Vacuum and Field Screening Readings at Communication Test Points

VPLE Case Closure Request

Former Paragon Electric Company

Two Rivers, Wisconsin

WDNR BRRTS No. 02-36-000153; AECOM Project No. 60236613

Location	Distance from Point of Extraction (ft)	Vacuum (in H <sub>2</sub> O)	VOCs by PID (ppm <sub>v</sub> )	O <sub>2</sub> (%)	CO <sub>2</sub> (%)
CTP-1A	5.5	0.125	11.5	19.7	1.4
CTP-1B	35	0.012	6.1	17.6	2.4
CTP-1C	22	0.020	4.2	19.8	0.4
CTP-1D	21	0.015	4.2	19.0	1.4
CTP-2A	10	0.300	3.1	-	-
CTP-2B	24	0.122	4.0	3.4	16.1
CTP-2C	36	0.022	24.0	21.0	0.2
CTP-3A	12.8	0.115	44.0	16.6	3.0
CTP-3B	25	0.021	2.0	17.3	1.8
CTP-3C	22	0.022	1.0	20.9	0.0
CTP-3D	20	0.016	1.3	17.1	2.9
CTP-4A	11.5	0.264	0.3	20.8	0.6
CTP-4B	25	0.009	6.0	20.3	0.9
CTP-5A	2	-	-	-	-
CTP-5B	6	0.570	1.8	20.4	0.6
CTP-5C	20	0.133	1.7	21.0	0.0
CTP-5D	43	0.020	3.6	20.1	0.2
CTP-5E	20	0.035	0.8	20.7	0.4
CTP-5F	20	0.015	0.6	20.7	0.3
CTP-5G	20	0.118	0.6	21.0	0.0

#### Notes:

1. The data included on this table has been provided by Geosytec Consultants.

- measurement not collected

ft - feet

min - minutes

in H<sub>2</sub>O - inches of water

PID - photoionization detector

ppm<sub>v</sub> - parts per million by volume

VOCs - volatile organic compounds

O<sub>2</sub> - oxygen

CO<sub>2</sub> - carbon dioxide

**Table A.5(d) Vapor Analytical Table**  
**Vapor Extraction Points PID Screening Results**

VPLE Case Closure Request

Former Paragon Electric Company

Two Rivers, Wisconsin

WDNR BRRTS No. 02-36-000153; AECOM Project No. 60236613

Vapor Extraction Well	Cumulative Volume Removed (Liters)	VOCs by PID (ppm <sub>v</sub> )
V-1	100	<0.1
V-2	100	<0.1
	500	<0.1
	1,000	<0.1
V-3	500	1.2
V-5	100	4.0
	500	24.0
	1,000	1.3

**Notes:**

1. The data included on this table has been provided by Geosytec Consultants.

PID - photoionization detector

ppm<sub>v</sub> - parts per million by volume

VOCs - volatile organic compounds

## Table A.5(e) Vapor Analytical Table

### Summary of Transient Response Analysis

VPLE Case Closure Request

Former Paragon Electric Company

Two Rivers, Wisconsin

WDNR BRRTS No. 02-36-000153; AECOM Project No. 60236613

Test Location	Monitored CTP	Distance Between CTP and HPV (ft)	HPV Test Duration (min)	HPV Flow Rate (scfm)	Calculated Leakance (B) Value (ft)	Radius of Gas Extracted During Test (ft)	Theoretical Test Extraction Radius1 (ft)	% of model	% Leakage Modeled	% of Sub-slab Soil Gas Collected in the Sample
HPV-1	CTP-1A	5.5	50	22.109048	13.15789474	32	57	0.5614035	0.4385965	0.61
HPV-2	CTP-2A	10	100	24.496894	16.12903226	45	88	0.5113636	0.4886364	0.65
HPV-3	CTP-3A	12.75	45	31.007639	7.657657658	26	60	0.4333333	0.5666667	0.5
HPV-4	CTP-4A	11.5	95	21.464845	6.182795699	27	73	0.369863	0.630137	0.5
HPV-5	CTP-5B	6	85	22.48698	12.94400963	38	75	0.5066667	0.4933333	0.61
HPV-5	CTP-5-D	43	--	27	13.63636364	--				

#### Notes:

1. The data included on this table has been provided by Geosytec Consultants.

Refer to Appendic C for detailed analyses.

CTP - communication test point

HPV - high purge volume

ft - feet

min - minutes

scfm - standard cubic feet per minute

% - pecent

## **Table A.6 Other Media of Concern**

VPLE Case Closure Request

Former Paragon Electric Company

Two Rivers, Wisconsin

WDNR BRRTS No. 02-36-000153; AECOM Project No. 60236613

**THIS TABLE IS NOT APPLICABLE.**

**NO SURFACE WATER OR SEDIMENT SAMPLING WAS PERFORMED FOR THIS PROJECT.**

**Table A.7 Water Level Elevations**

VPLE Case Closure Request  
 Former Paragon Electric Company  
 Two Rivers, Wisconsin  
 WDNR BRRS No. 02-36-000153; AECOM Project No. 60236613

Well Number	Date	Elevation TPVC (feet MSL)	Depth to Water (feet)	Water Table Elevation (feet MSL)
P-1	04/26/95	594.09	11.1	582.99
	05/19/95		11.04	583.05
	06/21/95		11.11	582.98
	09/06/95		10.51	583.58
	10/19/95		10.99	583.10
	11/13/95		10.33	583.76
	01/02/96		10.53	583.56
	03/27/96		10.88	583.21
	04/22/96		10.17	583.92
	07/02/96		9.3	584.79
	09/25/96		11.12	582.97
	12/18/96		11.33	582.76
	03/27/97		10.39	583.70
	09/29/97		10.23	583.86
	12/29/97		11.04	583.05
	03/17/98		10.21	583.88
	06/23/98		10.04	584.05
	09/29/98		10.25	583.84
	12/02/98		-	-
	03/26/99		-	-
	07/28/99		9.66	584.43
03/08/00	-	-		
06/15/00	-	-		
10/03/00	10.92	583.17		
12/22/03	-	-		
11/10/04	-	-		
MW-1	04/26/95	594.23	11.24	582.99
	05/19/95		11.18	583.05
	06/21/95		11.25	582.98
	09/06/95		10.62	583.61
	10/19/95		11.16	583.07
	11/13/95		10.37	583.86
	01/02/96		10.58	583.65
	03/27/96		10.93	583.30
	04/22/96		10.22	584.01
	07/02/96		9.33	584.90
	09/25/96		11.21	583.02
	12/18/96		11.52	582.71
	03/27/97		10.41	583.82
	09/29/97		10.47	583.76
	12/29/97		11.24	582.99
	03/17/98		10.30	583.93
	06/23/98		10.09	584.14
	09/29/98		10.36	583.87
	12/02/98		-	-
	03/26/99		-	-
	07/28/99		10.69	583.54
03/08/00	11.03	583.20		
06/15/00	10.07	584.16		
10/03/00	10.87	583.36		
12/23/03	10.69	583.54		
11/10/04	10.69	583.54		
10/26/11	10.63	583.60		
02/11/13	10.18	584.05		
MW-2	04/26/95	593.45	10.25	583.20
	05/19/95		10.06	583.39
	06/21/95		10.31	583.14
	09/06/95		9.82	583.63
	10/19/95		10.33	583.12
	11/13/95		9.49	583.96
	01/02/96		9.81	583.64
	03/27/96		10.01	583.44
	04/22/96		9.38	584.07
	07/02/96		8.46	584.99
	09/25/96		10.14	583.31
	12/18/96		10.47	582.98
	03/27/97		9.47	583.98
	09/29/97		9.58	583.87
	12/29/97		10.29	583.16
	03/17/98		9.45	584.00
	06/23/98		9.16	584.29
	09/29/98		9.49	583.96
	12/02/98		-	-
	03/26/99		-	-
	07/28/99		8.85	584.60
03/08/00	10.23	583.22		
06/15/00	9.24	584.21		
10/03/00	10.03	583.42		
12/22/03	9.88	583.57		
11/10/04	-	-		
10/26/11	9.82	583.63		
02/11/13	9.44	584.01		

**Table A.7 Water Level Elevations**

VPLE Case Closure Request  
 Former Paragon Electric Company  
 Two Rivers, Wisconsin  
 WDNR BRRTS No. 02-36-000153; AECOM Project No. 60236613

Well Number	Date	Elevation TPVC (feet MSL)	Depth to Water (feet)	Water Table Elevation (feet MSL)
MW-3	04/26/95	593.19	9.55	583.64
	05/19/95		9.41	583.78
	06/21/95		9.58	583.61
	09/06/95		9.21	583.98
	10/19/95		9.6	583.59
	11/13/95		8.89	584.3
	01/02/96		9.13	584.06
	03/27/96		9.27	583.92
	04/22/96		8.62	584.57
	07/02/96		8.1	585.09
	09/25/96		9.51	583.68
	12/18/96		9.8	583.39
	03/27/97		9.21	583.98
	09/29/97		9.20	583.99
	12/29/97		9.73	583.46
	03/17/98		8.88	584.31
	06/23/98		8.75	584.44
	09/29/98		9.00	584.19
	12/02/98		-	-
	03/26/99		-	-
	07/28/99		-	-
03/08/00	9.47	583.72		
06/15/00	8.64	584.55		
10/03/00	9.32	583.87		
12/22/03	9.21	583.98		
11/10/04	-	-		
MW-4	04/26/95	589.65	-	-
	05/19/95		7.67	581.98
	06/21/95		6.57	583.08
	09/06/95		5.88	583.77
	10/19/95		7.25	582.40
	11/13/95		-	-
	01/02/96		-	-
	03/27/96		6.21	583.44
	04/22/96		5.4	584.25
	07/02/96		4.57	585.08
	09/25/96		7.64	582.01
	12/18/96		7.81	581.84
	03/27/97		5.85	583.80
	09/29/97		5.63	584.02
	12/29/97		-	-
	03/17/98		5.48	584.17
	06/23/98		5.85	583.80
	09/29/98		5.52	584.13
	12/02/98		-	-
	03/26/99		-	-
	07/28/99		-	-
06/15/00	-	-		
10/03/00	-	-		
12/22/03	-	-		
11/10/04	-	-		
10/26/11	5.75	583.90		
02/11/13	5.55	584.10		
PZ-4A	04/26/95	589.76	6.54	583.22
	05/19/95		6.50	583.26
	06/21/95		6.49	583.27
	09/06/95		5.75	584.01
	10/19/95		6.33	583.43
	11/13/95		5.87	583.89
	01/02/96		-	-
	03/27/96		6.20	583.56
	04/22/96		5.54	584.22
	07/02/96		4.72	585.04
	09/25/96		6.59	583.17
	12/18/96		6.82	582.94
	03/27/97		5.93	583.83
	09/29/97		5.66	584.10
	12/29/97		-	-
	03/17/98		5.61	584.15
	06/23/98		5.93	583.83
	09/29/98		5.65	584.11
	12/02/98		-	-
	03/26/99		-	-
	07/28/99		5.03	584.73
06/15/00	-	-		
10/03/00	-	-		
12/22/03	-	-		
11/10/04	-	-		



**Table A.7 Water Level Elevations**

VPLE Case Closure Request  
 Former Paragon Electric Company  
 Two Rivers, Wisconsin  
 WDNR BRRTS No. 02-36-000153; AECOM Project No. 60236613

Well Number	Date	Elevation TPVC (feet MSL)	Depth to Water (feet)	Water Table Elevation (feet MSL)
EXT-4B	04/26/95	590.31	7.18	583.13
	05/19/95		9.90	580.41
	06/21/95		7.01	583.30
	09/06/95		6.33	583.98
	10/19/95		12.25	578.06
	11/13/95		9.92	580.39
	01/02/96		-	-
	03/27/96		6.73	583.58
	04/22/96		-	-
	07/02/96		5.13	585.18
	09/25/96		12.27	578.04
	12/18/96		16.10	574.21
	03/27/97		18.06	572.25
	09/29/97		-	-
	12/29/97		-	-
	03/17/98		-	-
	06/23/98		18.06	572.25
	09/29/98		-	-
	12/02/98		-	-
	03/26/99		-	-
	07/28/99		-	-
	06/15/00		-	-
	10/03/00		-	-
12/22/03	-	-		
11/10/04	-	-		
	02/11/13		4.45	585.86
MW-5	04/26/95	591.61	8.25	583.36
	05/19/95		8.17	583.44
	06/21/95		8.12	583.49
	09/06/95		7.55	584.06
	10/19/95		8.04	583.57
	11/13/95		7.38	584.23
	01/02/96		-	-
	03/27/96		7.78	583.83
	04/22/96		7.16	584.45
	07/02/96		6.33	585.28
	09/25/96		8.22	583.39
	12/18/96		8.53	583.08
	03/27/97		7.53	584.08
	09/29/97		7.38	584.23
	12/29/97		-	-
	03/17/98		7.28	584.33
	06/23/98		6.95	584.66
	09/29/98		7.20	584.41
	12/02/98		-	-
	03/26/99		-	-
	07/28/99		6.58	585.03
	03/08/00		7.96	583.65
	06/15/00		7.03	584.58
10/03/00	7.70	583.91		
12/22/03	-	-		
11/10/04	-	-		
MW-6/EXT-6	04/26/95	590.91	9	581.91
	05/19/95		17	573.91
	06/21/95		8.47	582.44
	09/06/95		7.74	583.17
	10/19/95		16.1	574.81
	11/13/95		7.72	583.19
	01/02/96		-	-
	03/27/96		8.3	582.61
	04/22/96		7.32	583.59
	07/02/96		6.67	584.24
	09/25/96		12.32	578.59
	12/18/96		17.1	573.81
	03/27/97		18.06	572.85
	09/29/97		10.53	580.38
	12/29/97		18.50	572.41
	03/17/98		7.49	583.42
	06/23/98		9.85	581.06
	09/29/98		7.68	583.23
	12/02/98		-	-
	03/26/99		-	-
	07/28/99		6.91	584.00
	03/08/00		15.24	575.67
	06/15/00		7.39	583.52
10/03/00	8.25	582.66		
12/22/03	-	-		
11/10/04	7.84	583.07		
10/26/11	7.80	583.11		
02/11/13	7.50	583.41		

**Table A.7 Water Level Elevations**

VPLE Case Closure Request  
 Former Paragon Electric Company  
 Two Rivers, Wisconsin  
 WDNR BRRS No. 02-36-000153; AECOM Project No. 60236613

Well Number	Date	Elevation TPVC (feet MSL)	Depth to Water (feet)	Water Table Elevation (feet MSL)
PZ-6A	04/26/95	593.21	10.60	582.61
	05/19/95		10.58	582.63
	06/21/95		10.59	582.62
	09/06/95		10.05	583.16
	10/19/95		10.52	582.69
	11/13/95		9.81	583.40
	01/02/96		10.02	583.19
	03/27/96		10.39	582.82
	04/22/96		9.67	583.54
	07/02/96		8.85	584.36
	09/25/96		10.66	582.55
	12/18/96		10.88	582.33
	03/27/97		10.04	583.17
	09/29/97		9.85	583.36
	12/29/97		10.74	582.47
	03/17/98		9.79	583.42
	06/23/98		9.73	583.48
	09/29/98		9.98	583.23
	12/02/98		-	-
	03/26/99		-	-
	07/28/99		9.42	583.79
	03/08/00		10.80	582.41
	06/15/00		9.73	583.48
10/03/00	10.47	582.74		
12/22/03	10.28	582.93		
11/10/04	10.26	582.95		
PZ-7	04/26/95	590.99	8.85	582.14
	05/19/95		8.83	582.16
	06/21/95		7.98	583.01
	09/06/95		8.32	582.67
	10/19/95		8.92	582.07
	11/13/95		8.12	582.87
	01/02/96		8.30	582.69
	03/27/96		8.82	582.17
	04/22/96		8.02	582.97
	07/02/96		7.16	583.83
	09/25/96		8.90	582.09
	12/18/96		9.05	581.94
	03/27/97		8.19	582.80
	09/29/97		8.16	582.83
	12/29/97		9.01	581.98
	03/17/98		8.06	582.93
	06/23/98		8.08	582.91
	09/29/98		8.33	582.66
	12/02/98		8.40	582.59
	03/26/99		8.73	582.26
	07/28/99		7.73	583.26
	03/08/00		9.10	581.89
	06/15/00		8.10	582.89
10/03/00	8.23	582.76		
12/22/03	8.56	582.43		
11/10/04	8.55	582.44		
01/19/05	8.10	582.89		
04/26/05	8.45	582.54		
MW-8	04/26/95	590.84	8.29	
	05/19/95		8.28	
	06/21/95		8.41	
	09/06/95		7.84	
	10/19/95		8.38	
	11/13/95		8.50	
	01/02/96		7.85	
	03/27/96		8.22	
	04/22/96		7.43	
	07/02/96		6.56	
	09/25/96		8.28	
	12/18/96		8.52	582.32
	03/27/97		7.43	583.41
	09/29/97		7.31	583.53
	12/29/97		8.43	582.41
	03/17/98		7.45	583.39
	06/23/98		7.37	583.47
	09/29/98		7.67	583.17
	12/02/98		-	-
	03/26/99		-	-
	07/28/99		7.02	583.82
	03/08/00		8.43	582.41
	06/15/00		9.91	580.93
10/03/00	8.23	582.61		
12/22/03	7.95	582.89		
11/10/04	-	-		
10/26/11	7.98	582.86		
02/11/13	10.12	580.72		

**Table A.7 Water Level Elevations**

VPLE Case Closure Request  
 Former Paragon Electric Company  
 Two Rivers, Wisconsin  
 WDNR BRRTS No. 02-36-000153; AECOM Project No. 60236613

Well Number	Date	Elevation TPVC (feet MSL)	Depth to Water (feet)	Water Table Elevation (feet MSL)
MW-9	04/26/95	593.74	11.02	582.72
	05/19/95		11.12	582.62
	06/21/95		11.02	582.72
	09/06/95		10.32	583.42
	10/19/95		10.88	582.86
	11/13/95		10.08	583.66
	01/02/96		10.26	583.48
	03/27/96		10.77	582.97
	04/22/96		9.96	583.78
	07/02/96		9.25	584.49
	09/25/96		11.23	582.51
	12/18/96		11.49	582.25
	03/27/97		10.52	583.22
	09/29/97		9.97	583.77
	12/29/97		11.32	582.42
	03/17/98		10.10	583.64
	06/23/98		10.11	583.63
	09/29/98		10.27	583.47
	12/02/98		-	-
	03/26/99		-	-
	07/28/99		9.56	584.18
	03/08/00		11.24	582.50
	06/15/00		9.91	583.83
	10/03/00		10.71	583.03
	12/22/03		10.47	583.27
	11/10/04		-	-
	10/26/11		10.47	583.27
	02/11/13		10.25	583.49
MW-11	04/26/95	593.74	8.98	584.76
	05/19/95		8.85	584.89
	06/21/95		9.08	584.66
	09/06/95		8.97	584.77
	10/19/95		9.38	584.36
	11/13/95		8.57	585.17
	01/02/96		8.84	584.90
	03/27/96		8.79	584.95
	04/22/96		8.28	585.46
	07/02/96		7.39	586.35
	09/25/96		8.72	585.02
	12/18/96		9.27	584.47
	03/27/97		8.48	585.26
	09/29/97		8.65	585.09
	12/29/97		-	-
	03/17/98		8.58	585.16
	06/23/98		8.12	585.62
	09/29/98		8.46	585.28
	12/02/98		-	-
	03/26/99		-	-
	07/28/99		-	-
	03/08/00		9.08	584.66
	06/15/00		8.11	585.63
	10/03/00		8.82	584.92
	12/22/03		8.87	584.87
	11/10/04		-	-
	10/26/11		8.85	584.89
	MW-12		04/26/95	590.62
05/19/95		8.43	582.19	
06/21/95		8.39	582.23	
09/06/95		7.67	582.95	
10/19/95		8.28	582.34	
11/13/95		-	-	
01/02/96		7.65	582.97	
03/27/96		8.21	582.41	
04/22/96		7.32	583.30	
07/02/96		6.61	584.01	
09/25/96		8.49	582.13	
12/18/96		8.74	581.88	
03/27/97		7.74	582.88	
09/29/97		7.67	582.95	
12/29/97		8.70	581.92	
03/17/98		7.45	583.17	
06/23/98		7.55	583.07	
09/29/98		7.69	582.93	
12/02/98		-	-	
03/26/99		-	-	
07/28/99		-	-	
03/08/00		8.71	581.91	
06/15/00		7.37	583.25	
10/03/00		8.18	582.44	
12/22/03		7.87	582.75	
11/10/04		-	-	

**Table A.7 Water Level Elevations**

VPLE Case Closure Request  
 Former Paragon Electric Company  
 Two Rivers, Wisconsin  
 WDNR BRRTS No. 02-36-000153; AECOM Project No. 60236613

Well Number	Date	Elevation TPVC (feet MSL)	Depth to Water (feet)	Water Table Elevation (feet MSL)		
PZ-13	04/26/95	590.75	8.53			
	05/19/95		8.34			
	06/21/95		8.52			
	09/06/95		8.12			
	10/19/95		8.58			
	11/13/95		7.63			
	01/02/96		8.20			
	03/27/96		-			
	04/22/96		7.76			
	07/02/96		6.95			
	09/25/96		8.40			
	12/18/96		8.55	582.20		
	03/27/97		-	-		
	09/29/97		7.86	582.89		
	12/29/97		8.52	582.23		
	03/17/98		7.86	582.89		
	06/23/98		7.78	-		
	09/29/98		8.08	582.67		
	12/02/98		8.17	582.58		
	03/26/99		8.32	582.43		
	07/28/99		7.69	583.06		
	03/08/00		8.68	582.07		
	06/15/00		8.09	582.66		
	10/03/00		8.66	582.09		
	12/22/03		8.36	582.39		
	11/10/04		8.41	582.34		
	01/19/05		Frozen			
04/26/05	8.23	582.52				
PZ-14	04/26/95	595.13	13.91	581.22		
	05/19/95		13.70	581.43		
	06/21/95		13.99	581.14		
	09/06/95		13.53	581.60		
	10/19/95		13.97	581.16		
	11/13/95		13.41	581.72		
	01/02/96		13.46	581.67		
	03/27/96		13.75	581.38		
	04/22/96		13.32	581.81		
	07/02/96		12.53	582.60		
	09/25/96		13.55	581.58		
	12/18/96		13.52	581.61		
	03/27/97		13.19	581.94		
	09/29/97		12.77	582.36		
	12/29/97		13.60	581.53		
	03/17/98		13.23	581.90		
	06/23/98		13.10	582.03		
	09/29/98		13.55	581.58		
	12/02/98		13.39	581.74		
	03/26/99		13.77	581.36		
	07/28/99		13.43	581.70		
	03/08/00		14.20	580.93		
	06/15/00		13.81	581.32		
	10/03/00		14.30	580.83		
	12/22/03		14.06	581.07		
	PZ-14R		11/10/04	594.47	13.25	581.22
			01/19/05		13.08	581.39
04/26/05		13.24	581.23			
EXT-15	04/26/95	592.72	10.94	581.78		
	05/19/95		10.83	581.89		
	06/21/95		-	-		
	09/06/95		10.52	582.20		
	10/19/95		11.07	581.65		
	11/13/95		10.37	582.35		
	01/02/96		10.53	582.19		
	03/27/96		10.91	581.81		
	04/22/96		10.25	582.47		
	07/02/96		9.38	583.34		
	09/25/96		10.78	581.94		
	12/18/96		10.85	581.87		
	03/27/97		10.20	582.52		
	09/29/97		10.06	582.66		
	12/29/97		10.89	581.83		
	03/17/98		10.20	582.52		
	06/23/98		10.15	582.57		
	09/29/98		10.48	582.24		
	12/02/98		-	-		
	03/26/99		-	-		
	07/28/99		10.08	-		
	03/08/00		11.12	581.60		
	06/15/00		10.42	582.30		
	10/03/00		11.15	581.57		
	12/22/03		10.85	581.87		
	11/10/04		10.77	581.95		
	01/19/05		10.36	582.36		
04/26/05	10.74	581.98				

**Table A.7 Water Level Elevations**

VPLE Case Closure Request  
 Former Paragon Electric Company  
 Two Rivers, Wisconsin  
 WDNR BRRS No. 02-36-000153; AECOM Project No. 60236613

Well Number	Date	Elevation TPVC (feet MSL)	Depth to Water (feet)	Water Table Elevation (feet MSL)
EXT-16	04/26/95	592.52	16.05	576.47
	05/19/95		14.52	578.00
	06/21/95		17.50	575.02
	09/06/95		10.45	582.07
	10/19/95		15.50	577.02
	11/13/95		17.18	575.34
	01/02/96		10.40	582.12
	03/27/96		10.79	581.73
	04/22/96		10.23	582.29
	07/02/96		9.35	583.17
	09/25/96		12.62	579.90
	12/18/96		23.00	569.52
	03/27/97		18.06	574.46
	09/29/97		17.40	575.12
	12/29/97		20.50	572.02
	03/17/98		20.00	572.52
	06/23/98		23.50	569.02
	09/29/98		16.42	576.10
	12/02/98		-	-
	03/26/99		-	-
07/28/99	10.19	582.33		
03/08/00	11.11	581.41		
06/15/00	15.50	577.02		
10/03/00	16.80	575.72		
12/22/03	10.86	581.66		
11/10/04	10.82	581.70		
01/19/05	10.48	582.04		
04/26/05	10.75	581.77		
PZ-17	11/10/04	591.67	11.20	580.47
	01/19/05		11.43	580.24
	04/26/05		11.43	580.24
PZ-18D	11/10/04	592.47	12.52	579.95
	01/19/05		12.85	579.62
	04/26/05		12.64	579.83
PZ-18S	11/10/04	592.46	12.01	580.45
	01/19/05		12.20	580.26
	04/26/05		12.20	580.26
PZ-19	11/10/04	591.96	11.54	580.42
	01/19/05		11.72	580.24
	04/26/05		11.6	580.36
IW-1	11/10/04	593.72	11.95	581.77
	01/19/05		11.64	582.08
	04/26/05		11.91	581.81
IW-14	11/10/04	593.49	11.81	581.68
	01/19/05		11.48	582.01
	01/11/00		11.73	581.76

**Notes:**

- (1) All elevations are recorded in feet mean sea level.
- (2) - = depth to water was not collected

**Table A.8 SVE Emissions Information**

VPLE Case Closure Request  
 Former Paragon Electric Company  
 Two Rivers, Wisconsin  
 WDNR BRRTS No. 02-36-000153; AECOM Project No. 60236613

Date	Cummulative Blower Operation (hours)	Blower Vacuum (inches wg)	Air Emission Flow Rate		Inlet Temp. F	Exhaust Temp. F	PID (ppm)	Stack FID (ppm)	VOC Emission Rate (lbs/hour)	Cummulative Total VOC Emissions (lbs)
			(fpm)	(cfm)						
<b>Press and Paint Area Emissions</b>										
01/31/12	0 (Start up)	29	2000	393	--	--	2.5	8	0.04	0
02/01/12	24	30	2000	393	--	--	0.5	4	0.02	0.7
02/02/12	48	30	2000	393	55	73	1.8	2	0.01	1.1
02/07/12	110	30	2000	393	57	73	1.8	2	0.01	1.8
02/13/12	130	30	2000	393	55	68	0	5	0.03	2.1
02/13/12	131	25	2000	393	57	73	0	5	0.03	2.2
02/21/12	176	24	2000	393	57	72	0	5	0.03	3.3
03/09/12	300	25	2000	393	55	71	0	6.5	0.03	7.1
03/23/12	390	28	2000	393	56	78	0	7.5	0.04	10.4
04/17/12	665	28	2000	393	58	75	--	5.5	0.03	19.8
04/30/12	808	25	2000	393	56	73	--	8	0.04	24.9
05/07/12	885	26	2000	393	56	73	--	14	0.07	29.3
05/22/12	1050	26	2000	393	59	78	--	8	0.04	38.9
06/28/12	1457	23.5	2000	393	65	84	--	11	0.06	59.2
07/24/12	1743	27	2000	393	69	92	--	12	0.06	76.5
08/01/12	1831	27	2000	393	69	87	--	7	0.04	80.9
Shut SVE Sytem off after collecting Summa Canister vapor samples										
09/10/12	Collected Summa Canister vapor sample from the paint area (PP-5 through PP-11) - 30-min. purge									
09/10/12	Collected Summa Canister vapor sample from the Press room area (PP-1 through PP-4, V-3 and V-4)- 30-min. purge									
Shut SVE Sytem off after collecting vapor samples, restarted SVE on 10/31/12 (PP-3, 4, 5, 9, 11, V-3 & V-5)										
10/31/12	0	35	2000	393	65	73	--	6	0.03	80.9
11/07/12	77	35	2000	393	--	74	--	6	0.03	83.3
11/13/12	143	38	2000	393	--	76	--	5	0.03	85.2
11/21/12	335	36	2000	393	--	77	--	6.5	0.03	91.0
11/30/12	434	36	2000	393	--	78	--	7	0.04	94.6
12/12/12	566	36	2000	393	--	74	--	6.5	0.03	99.2
12/19/12	643	36	2000	393	--	75	--	7	0.04	102.0
12/27/12	731	36	2000	393	--	69	--	8	0.04	105.4
01/03/13	808	38	2000	393	--	73	--	6.5	0.03	108.4
Shut off SVE system on January 3, 2013										
02/14/13	Turned SVE system on to collect the final vapor samples from the Press and Paint areas - 30-min. purge									
<b>Storage Area Emissions</b>										
01/31/12	0 (Start up)	37	1500	131	--	--	12	25	0.04	0
02/01/12	24	37	1500	131	--	--	5.3	10	0.02	0.7
02/02/12	48	37	1500	131	59	107	23.7	9	0.02	1.1
02/07/12	168	36.5	1550	135	59	106	0.2	6	0.01	2.7
02/13/12	312	37	1550	135	59	111	0	6	0.01	4.2
02/21/12	504	35	1550	135	59	106	0	15	0.03	7.9
03/09/12	912	34	1600	139	59	105	0	15	0.03	19.1
03/23/12	1248	35	1600	139	58	108	0	17	0.03	29.1
04/17/12	1848	35	1600	139	57	104	--	12	0.02	45.4
04/30/12	2160	35	1600	139	57	104	--	3.5	0.01	49.9
05/07/12	2328	43	1550	135	58	108	--	14	0.03	52.5
05/22/12	2688	46	1500	131	59	117	--	32	0.06	67.2
06/28/12	3576	45	1400	122	68	117	--	20	0.03	106.5
07/24/12	4200	45	1450	126	72	>125	--	17	0.03	125.6
08/01/12	4392	46	1450	126	71	>125	--	16	0.03	131.0
08/01/12	Shut SVE Sytem off after collecting Summa Canister vapor samples									
09/10/12	0	38	1575	137	--	117	--	6.5	--	--
09/10/12	Collected Summa Canister vapor sample after 30-min. purge									
Shut SVE Sytem off after collecting vapor samples, restarted SVE on 10/31/12 (HW-1, 3, & 6)										
10/31/12	0	50	1350	117	--	107	--	1.5	0.00	131.0
11/07/12	168	49	1350	117	--	120	--	8.5	0.01	132.3
Changed extraction points to HW-2, 3 & 5.										
11/07/12	169	55	1250	109	--	125	--	7.5	0.01	132.3
11/13/12	313	54	1250	109	--	130	--	7	0.01	133.9
Changed extraction points to HW-1, 3 & 6.										
11/13/12	314	48	1400	122	--	123	--	8	0.01	133.9
11/21/12	506	48	1350	117	--	120	--	6	0.01	136.0
Changed extraction points to HW-2, 3 & 5.										
11/21/12	507	54	1250	109	--	125	--	6	0.01	136.0
11/30/12	723	54	1250	109	--	128	--	8	0.01	138.2
Changed extraction points to HW-1, 3 & 6.										
11/30/12	724	48	1350	117	--	122	--	8	0.01	138.2
12/12/12	1012	48	1350	117	--	117	--	7.5	0.01	141.8
Changed extraction points to HW-2, 3 & 5.										
12/12/12	1013	54	1250	109	--	123	--	7	0.01	141.8
12/19/12	1181	54	1250	109	--	126	--	9	0.01	143.7
Changed extraction points to HW-1, 3 & 6.										
12/19/12	1182	48	1350	117	--	121	--	9	0.01	143.7
12/27/12	1374	48	1350	117	--	118	--	9	0.01	146.5
Changed extraction points to HW-2, 3 & 5.										
12/27/12	1375	53	1250	109	--	121	--	7	0.01	146.5
01/03/13	1543	53	1250	109	--	125	--	10	0.01	148.6
Shut off SVE system on January 3, 2012										
02/18/13	Turned SVE system on to collect the final vapor sample from the Storage area - 30-min. purge									

**Notes:**

- (1) Volatile Organic Compound (VOC) emission rate and total based on Flame Ionization Detection (FID) reading.
- (2) Turned off system at 4:00 pm and restarted system at 7:00am beginning 2/6/12, system is off on weekends.
- (3) Installed timer on March 23, 2012 for blower control 24/7; on daily for 11 hours.
- (4) Power failure in the Paragon facility from late August to September 9.

fpm = feet per minute  
 cfm = cubic feet per minute  
 fpm = feet per minute  
 ppm = parts per million  
 lbs = pounds  
 PID = Photoionization Detextor

## **ATTACHMENT B – FIGURES**

Figure B.1.a: Location Map

Figure B.1.b: Detailed Site Map

Figure B.1.c: RR Site Map

Figure B.2.a(1): Pre-Remedial Soil Contamination – Former Storage Area

Figure B.2.a(2): Pre-Remedial Soil Contamination – Former Press Room Area

Figure B.2.a(3): Pre-Remedial Soil Contamination – Former Paint Area

Figure B.2.a(4): Pre-Remedial Soil Sampling Locations

Figure B.2.b(1): Post-Remedial Soil Contamination – Former Storage Area

Figure B.2.b(2): Post-Remedial Soil Contamination – Former Press Room Area

Figure B.2.b(3): Post-Remedial Soil Contamination – Former Paint Area

Figure B.2.c(1): Remaining Soil Contamination – Former Storage Area

Figure B.2.c(2): Remaining Soil Contamination – Former Press Room Area

Figure B.2.c(3): Remaining Soil Contamination – Former Paint Area

Figure B.3.a: Cross Section A-A'

Figure B.3.b: Groundwater Isoconcentration Map

Figure B.3.c: Groundwater Flow Direction

Figure B.3.d: Monitoring Well Location

Figure B.4.a(1): Pre-Remedial Soil Vapor Sampling Locations

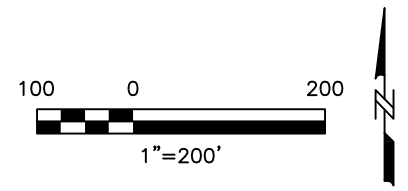
Figure B.4.a(2): Post-Remedial Soil Vapor Sampling Locations



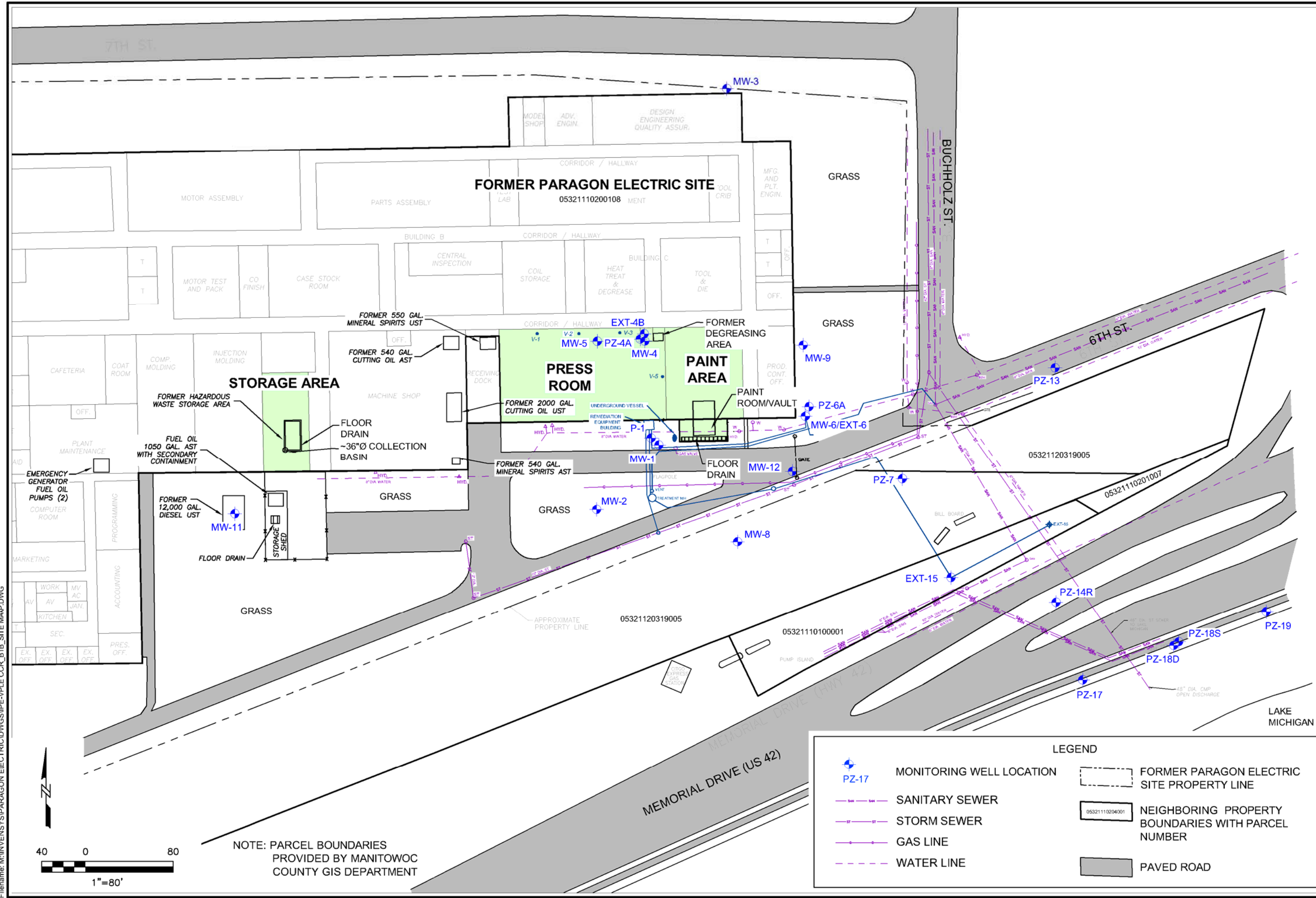
NOTE: PARCEL BOUNDARIES PROVIDED BY MANITOWOC COUNTY GIS DEPARTMENT

**LEGEND**

- FORMER PARAGON ELECTRIC SITE PROPERTY LINE
- NEIGHBORING PROPERTY BOUNDARIES WITH PARCEL NUMBER

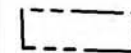









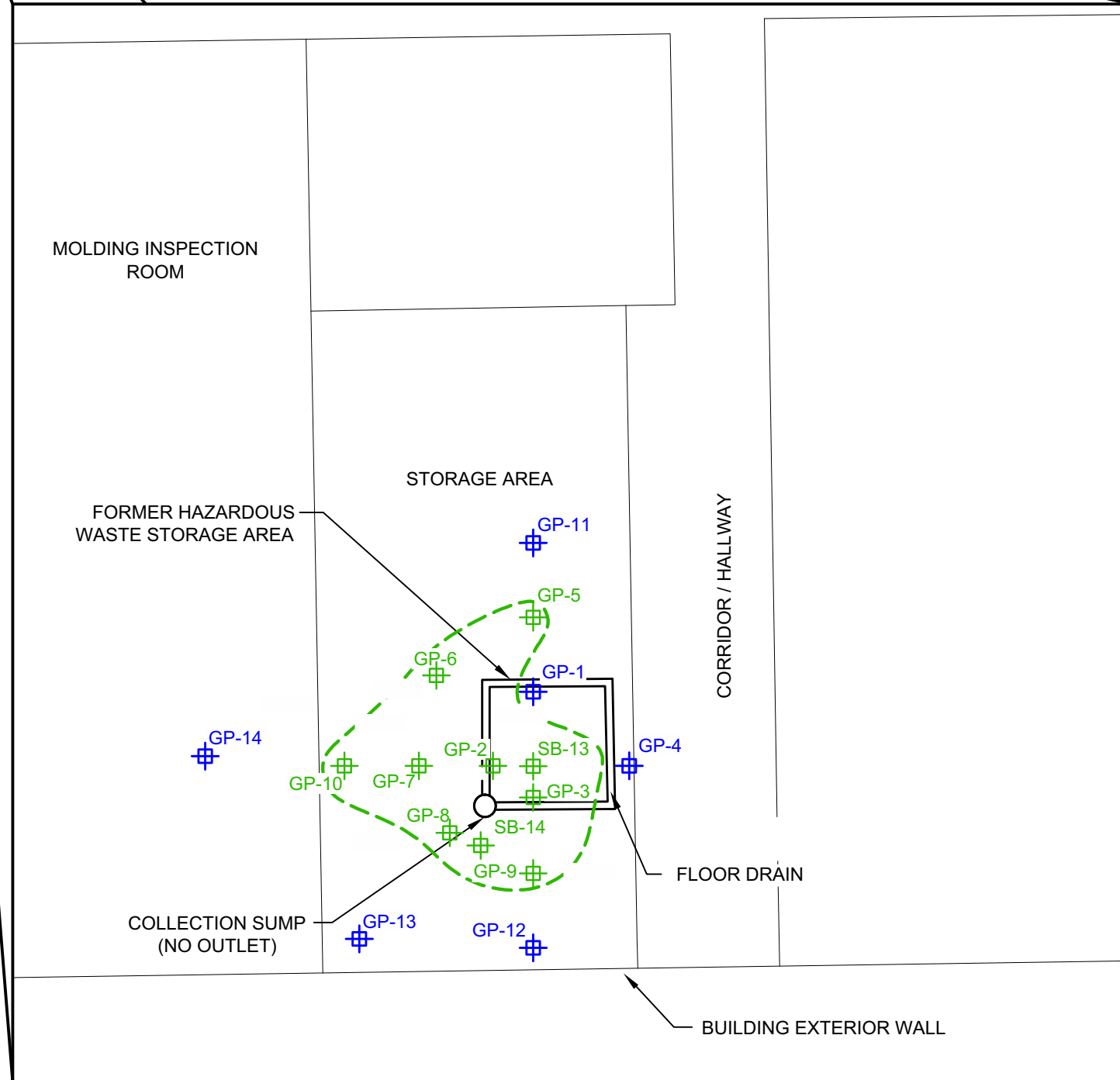
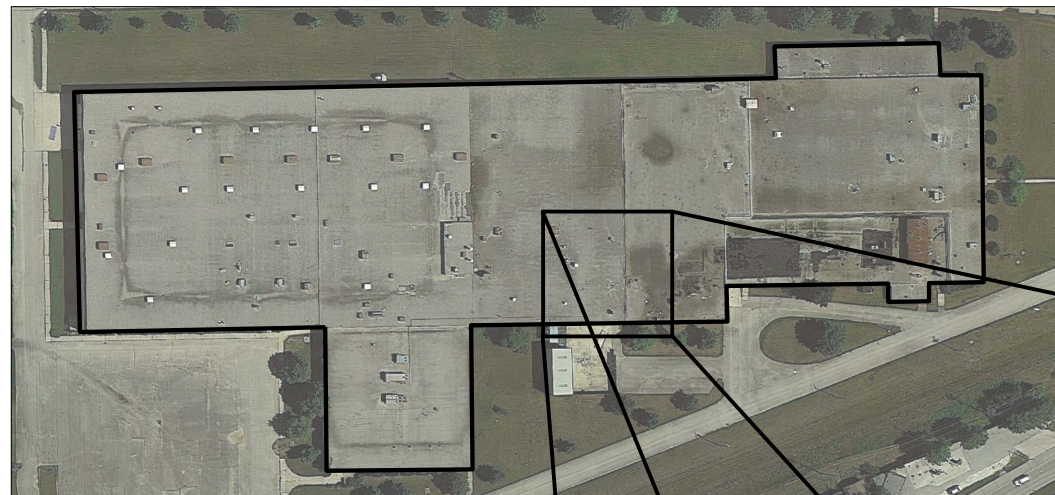


**LEGEND**

-  FORMER PARAGON ELECTRIC SITE PROPERTY LINE
-  PARAGON ELECTRIC BRRTS OPEN SITE
-  CITGO EXPRESS BRRTS CLOSED SITE

200 0 400  
1" = 400'



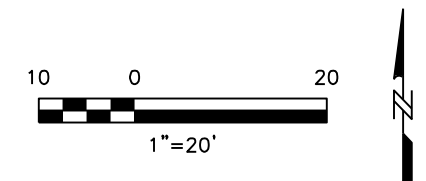


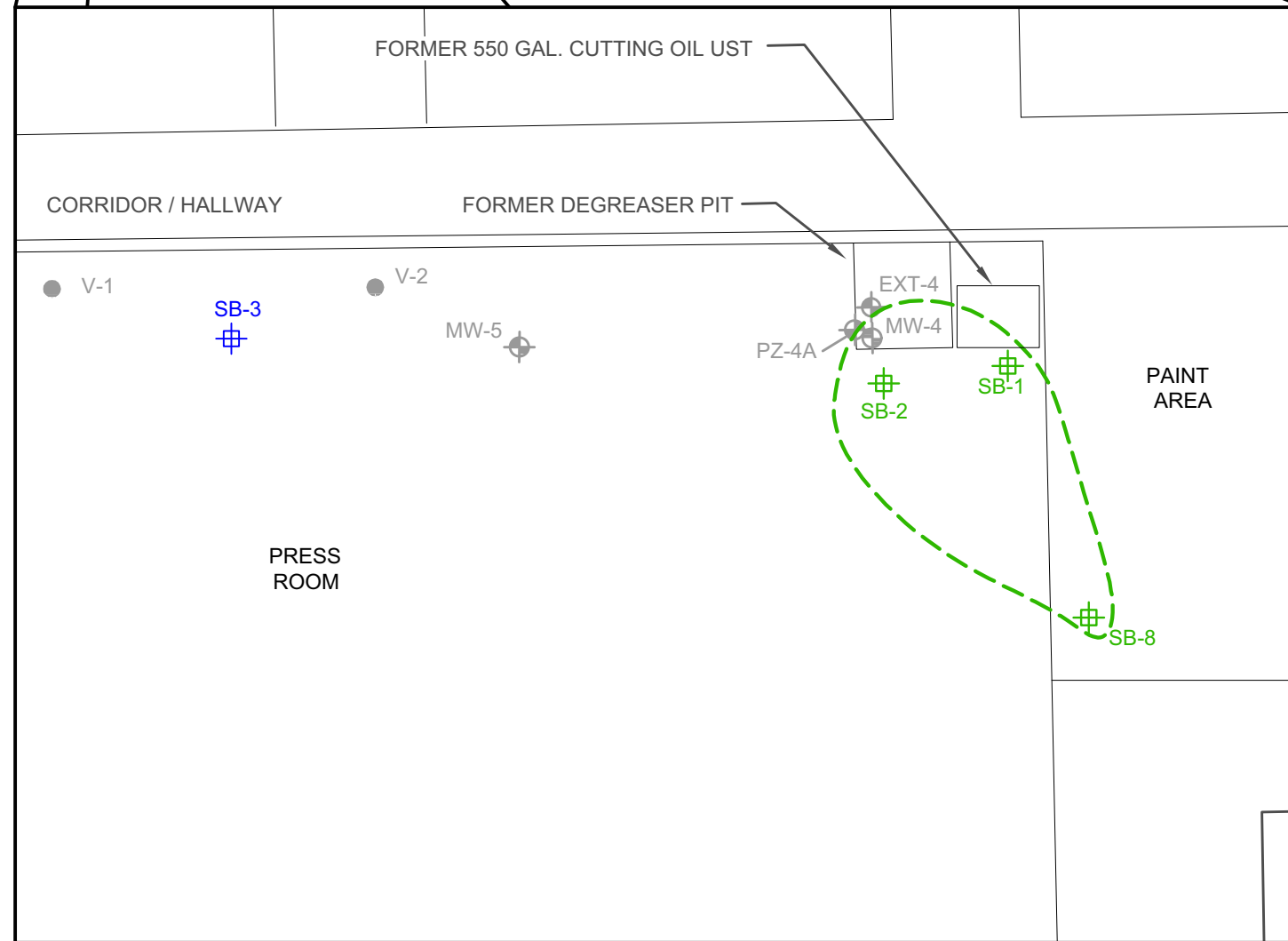
Former Storage Area			
Soil Sample	Date	PCE (µg/Kg)	TCE (µg/Kg)
<b>SB-13 0.5-2.5'</b>	10/12/09	<b>102</b>	<b>176</b>
SB-13 4.5-6.5'	10/12/09	<25.0	<25.0
<b>SB-14 0.5-2.5'</b>	10/12/09	<b>132</b>	<b>187</b>
SB-14 4.5-6.5'	10/12/09	<25.0	<25.0
GP-1 0.5 -4.0'	11/7/11	<25.0	<25.0
GP-1 4-6'	11/7/11	<25.0	<25.0
<b>GP-2 0.5 -4.0'</b>	11/7/11	<b>35.3 (j)</b>	<b>39.1 (j)</b>
GP-2 4-6'	11/7/11	<26.3	<26.3
<b>GP-3 0.4 -4.0'</b>	11/7/11	<b>72.3</b>	<b>78.2</b>
GP-3 4-6'	11/7/11	<25.0	<25.0
GP-4 0.5 -4.0'	11/7/11	<25.0	<25.0
GP-4 4-6'	11/7/11	<25.0	<25.0
<b>GP-5 0.5 -4.0'</b>	11/7/11	<25.0	<b>35.2 (j)</b>
GP-5 4-6'	11/7/11	<25.0	<25.0
<b>GP-6 0.5 -4.0'</b>	11/7/11	<b>81.9</b>	<b>163</b>
GP-6 4-6'	11/7/11	<25.0	<25.0
<b>GP-7 0.5 -4.0'</b>	11/7/11	<b>136</b>	<b>203</b>
GP-7 4-6'	11/7/11	<25.0	<25.0
<b>GP-8 0.5 -4.0'</b>	11/7/11	<b>29.3 (j)</b>	<b>35.6 (j)</b>
GP-8 4-6'	11/7/11	<25.0	<25.0
<b>GP-9 0.5 -4.0'</b>	11/8/11	<b>33.6 (j)</b>	<b>44.7 (j)</b>
GP-9 4-6'	11/8/11	<25.0	<25.0
<b>GP-10 0.5 -4.0'</b>	11/7/11	<b>53.5 (j)</b>	<b>67.2 (j)</b>
GP-10 4-6'	11/7/11	<25.0	<25.0
GP-11 0.5 -4.0'	11/7/11	<25.0	<25.0
GP-11 4-6'	11/7/11	<25.3	<25.3
GP-12 0.5 -4.0'	11/8/11	<25.0	<25.0
GP-12 4-6'	11/8/11	<25.0	<25.0
GP-13 0.5 - 4.0	12/15/11	<25.0	<25.0
GP-14 0.5 - 4.0	12/15/11	<25.0	<25.0

Soil to Groundwater Leaching Pathway RCL  
 Exceedances in are shown in Green

**LEGEND**

- GP-12 SOIL SAMPLING LOCATION (NOT EXCEEDING RCL)
- GP-8 SOIL SAMPLING LOCATION (RCL EXCEEDANCES)
- APPROX. EXTENT OF SOIL EXCEEDING SOIL-TO-GROUNDWATER LEACHING PATHWAY RCL



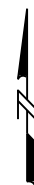
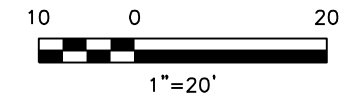


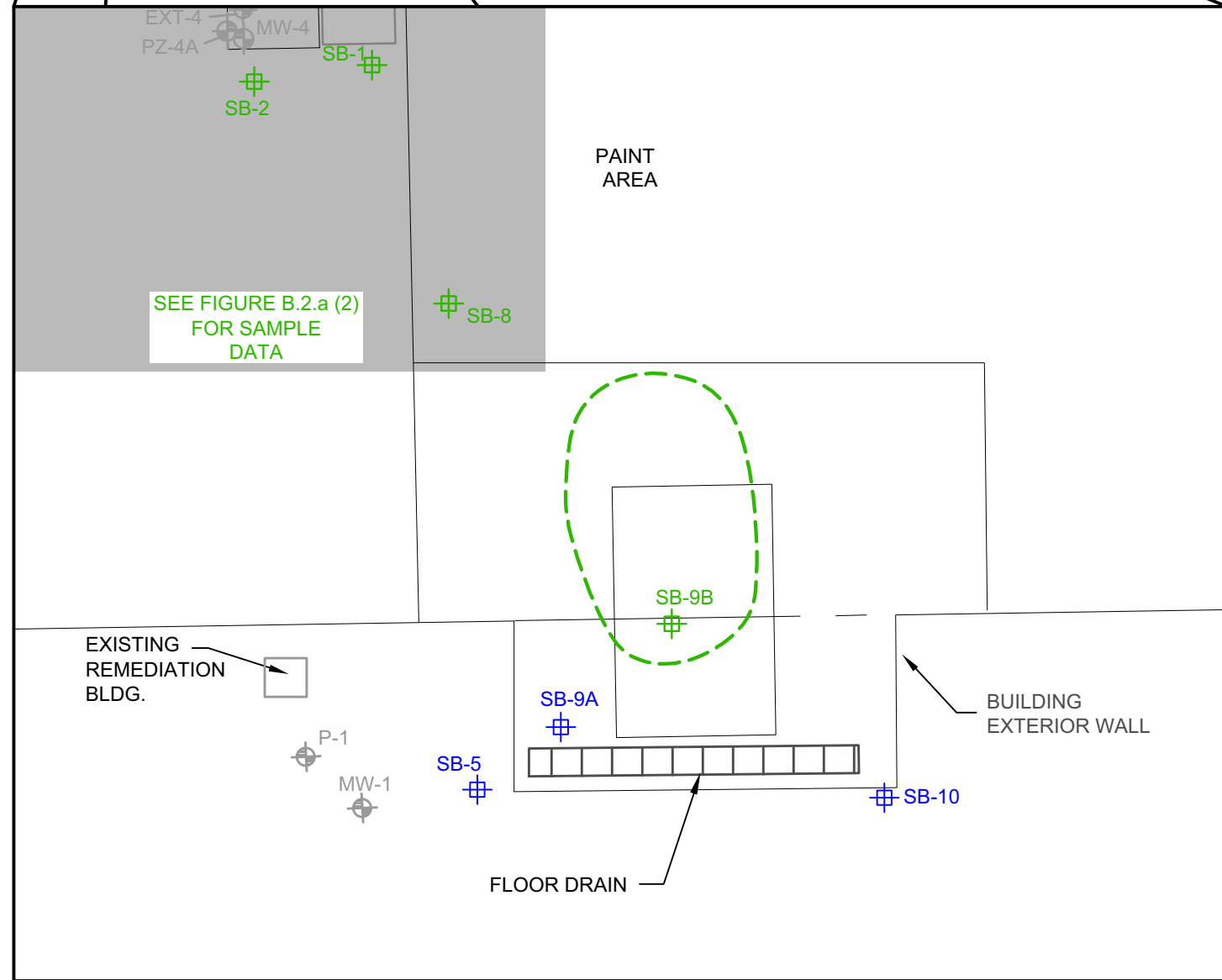
Former Press Room Area			
Soil Sample	Date	PCE (µg/Kg)	TCE (µg/Kg)
SB-1 0.5-2.5'	10/9/09	<25.0	<25.0
<b>SB-1 4.5-6.5'</b>	10/9/09	<25.0	<b>33.8 (j)</b>
SB-2 0.5-2.5'	10/9/09	<25.0	<25.0
<b>SB-2 4.5-6.5'</b>	10/9/09	<25.0	<b>362</b>
SB-3 1.0-3.0'	10/9/09	<25.0	<25.0
SB-3 5.0-6.0'	10/9/09	<25.0	<25.0
<b>SB-8 0.5-2.5'</b>	10/12/09	<25.0	<b>45.3 (j)</b>
SB-8 4.5-6.5'	10/12/09	<25.0	<25.0

Soil to Groundwater Leaching Pathway  
 RCL Exceedances in are shown in **Green**

LEGEND

- SB-3 SOIL SAMPLING LOCATION (NOT EXCEEDING RCL)
- SB-8 SOIL SAMPLING LOCATION (RCL EXCEEDANCES)
- APPROX. EXTENT OF SOIL EXCEEDING SOIL-TO-GROUNDWATER LEACHING PATHWAY RCL
- V-1 EXISTING VAPOR EXTRACTION LOCATION
- PZ-4A EXISTING MONITORING WELL LOCATION



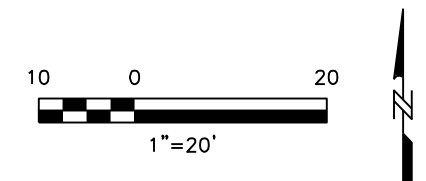


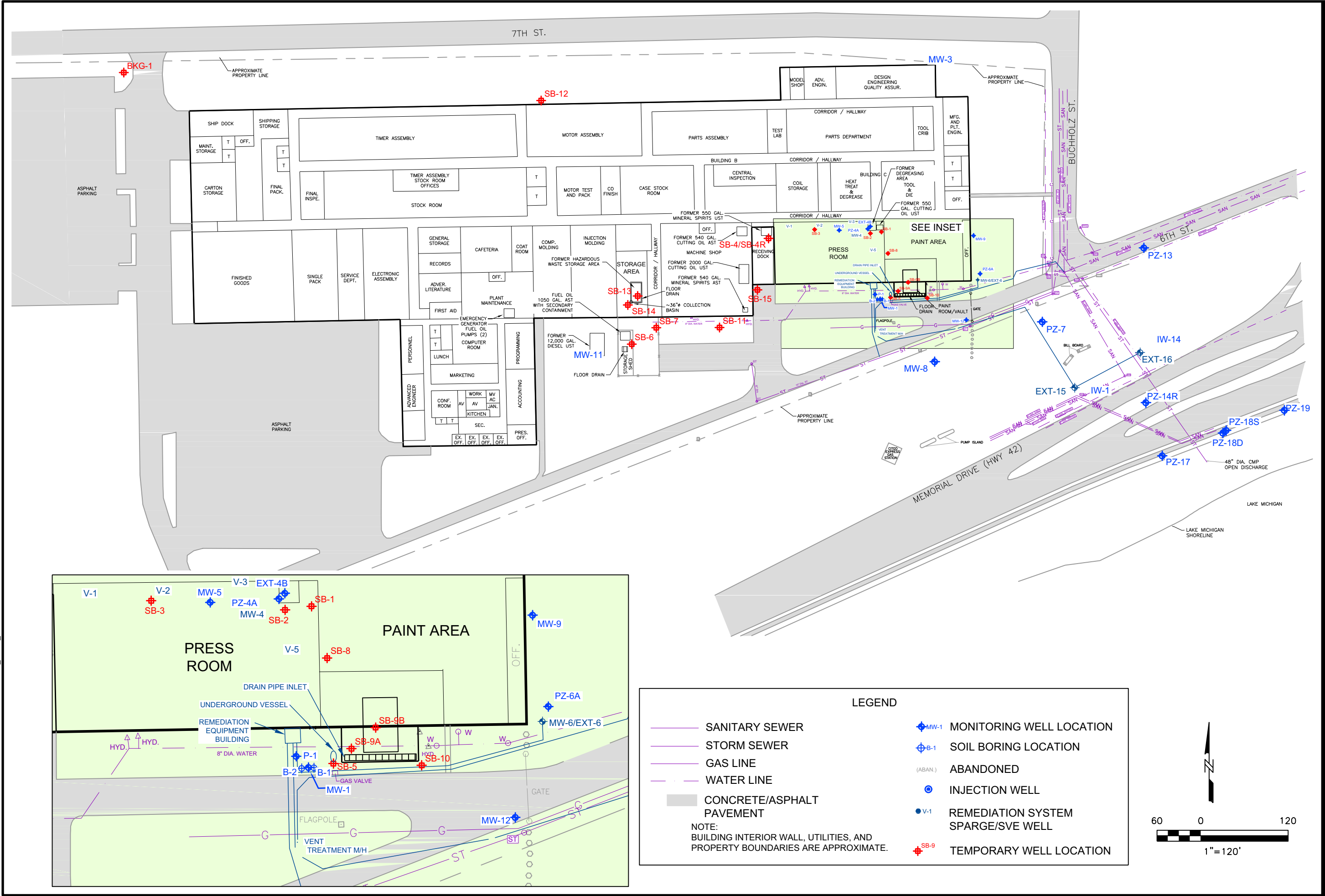
Former Paint Area			
Soil Sample	Date	PCE (µg/Kg)	TCE (µg/Kg)
SB-5 0.5-2'	10/8/09	<25.0	<25.0
SB-5 4-6'	10/8/09	<25.0	<25.0
SB-9A 1.5-3.0'	10/15/09	<25.0	<25.0
SB-9A 6.0-7.0'	10/15/09	<25.0	<25.0
<b>SB-9B 0.5-1.5'</b>	10/15/09	<25.0	<b>170</b>
SB-9B 6.0-7.0'	10/15/09	<25.0	<25.0
SB-10 2-4'	10/8/09	<25.0	<25.0
SB-10 4-6'	10/8/09	<25.0	<25.0

Soil to Groundwater Leaching Pathway RCL  
 Exceedances in are shown in **Green**

LEGEND

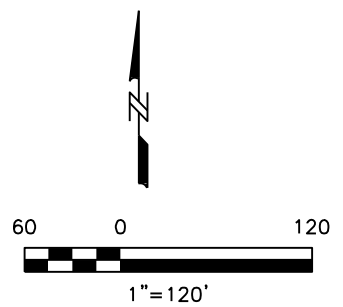
- SB-9A SOIL SAMPLING LOCATION (NOT EXCEEDING RCL)
- SB-9B SOIL SAMPLING LOCATION (RCL EXCEEDANCES)
- APPROX. EXTENT OF SOIL EXCEEDING SOIL-TO-GROUNDWATER LEACHING PATHWAY RCL
- V-1 EXISTING VAPOR EXTRACTION LOCATION
- PZ-4A EXISTING MONITORING WELL LOCATION

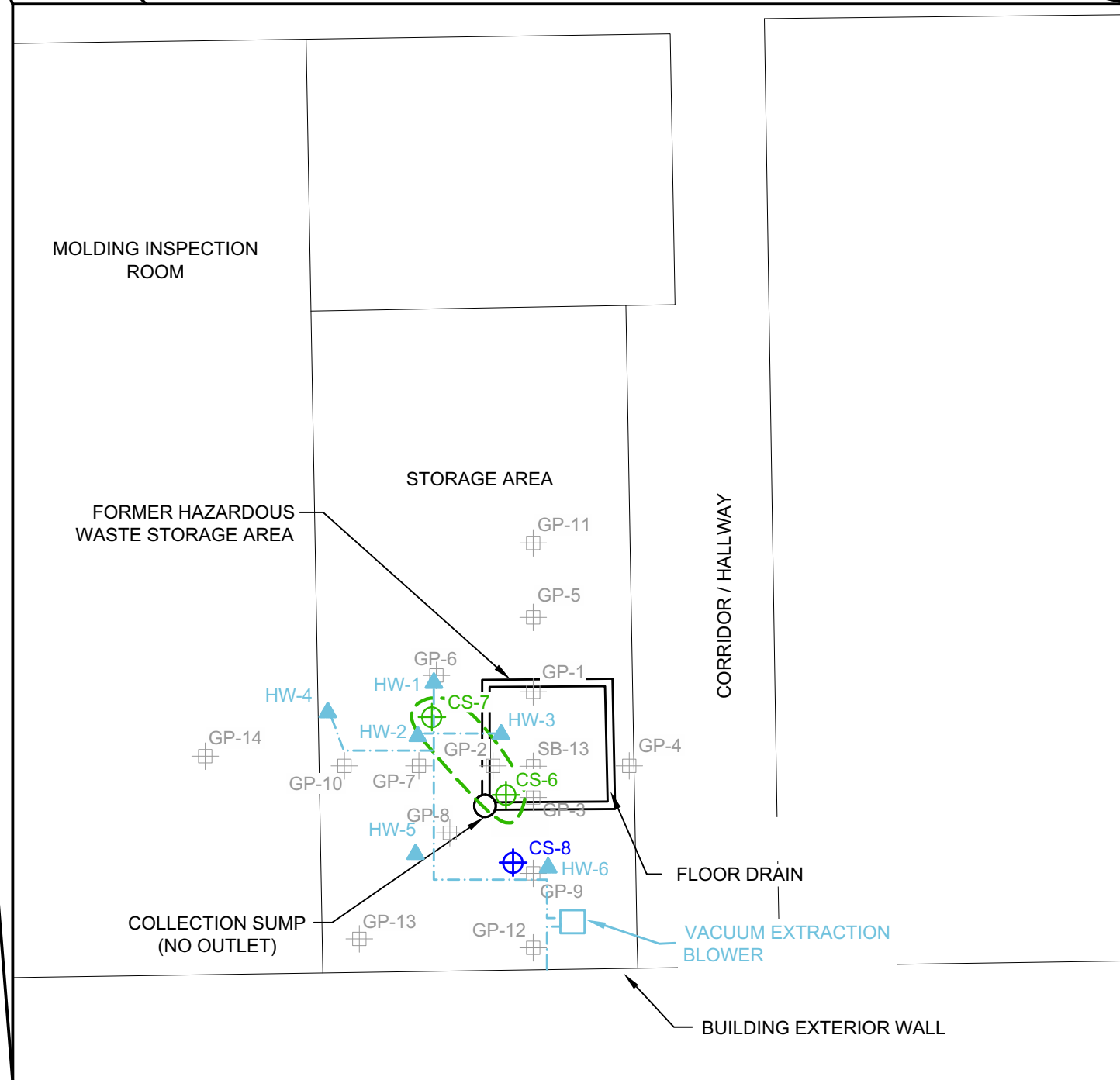
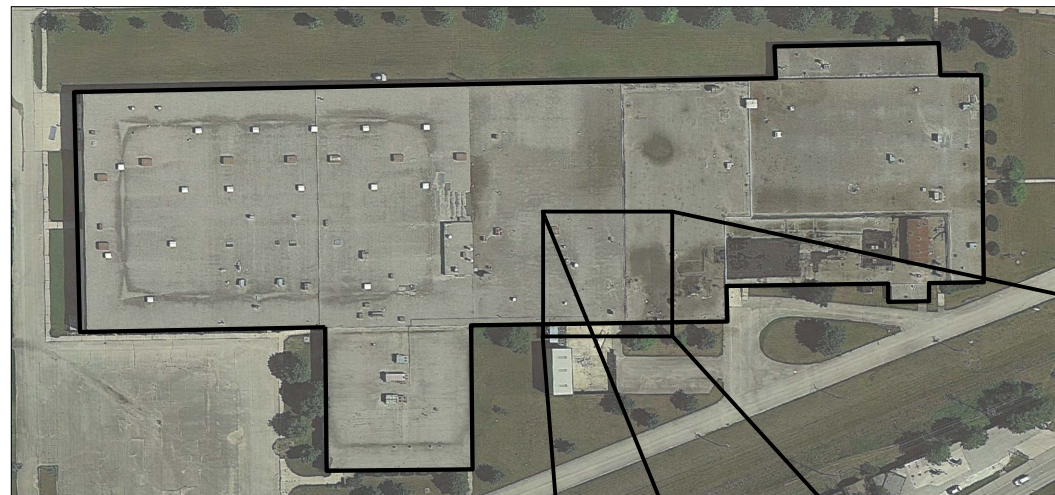




**LEGEND**

	SANITARY SEWER		MW-1	MONITORING WELL LOCATION
	STORM SEWER		B-1	SOIL BORING LOCATION
	GAS LINE	(ABAN.)		ABANDONED
	WATER LINE			INJECTION WELL
	CONCRETE/ASPHALT PAVEMENT		V-1	REMEDIATION SYSTEM SPARGE/SVE WELL
	NOTE: BUILDING INTERIOR WALL, UTILITIES, AND PROPERTY BOUNDARIES ARE APPROXIMATE.		SB-9	TEMPORARY WELL LOCATION



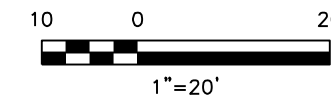


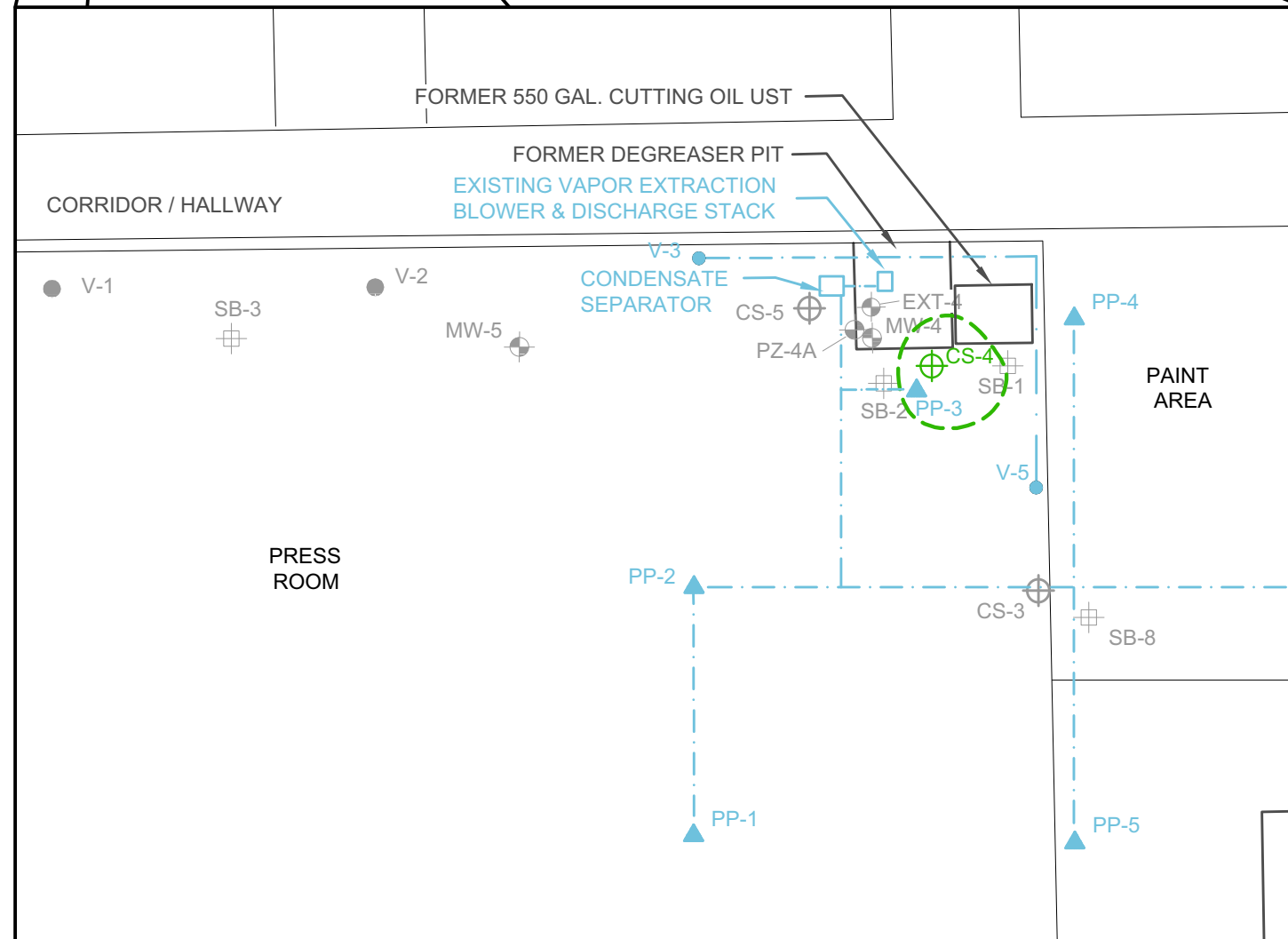
Former Storage Area			
Soil Sample	Date	PCE (µg/Kg)	TCE (µg/Kg)
CS-6 0.5-4.0'	02/06/13	<25.0	32.1 J
CS-6 4-6'	02/06/13	<25.0	<25.0
CS-7 0.5-4.0'	02/06/13	33.7 J	39.2 J
CS-7 4-6'	02/06/13	<25.0	<25.0
CS-8 0.5-4.0'	02/06/13	<25.0	<25.0
CS-8 4-6'	02/06/13	<25.0	<25.0

Soil to Groundwater Leaching Pathway RCL  
 Exceedances in are shown in Green

**LEGEND**

- CS-8 SOIL SAMPLING LOCATION (NOT EXCEEDING RCL)
- CS-6 SOIL SAMPLING LOCATION (RCL EXCEEDANCES)
- APPROX. EXTENT OF SOIL EXCEEDING SOIL-TO-GROUNDWATER LEACHING PATHWAY RCL
- VAPOR EXTRACTION SYSTEM
- HW-6 VAPOR EXTRACTION POINT



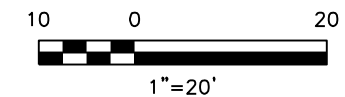


Former Press Room Area			
Soil Sample	Date	PCE (µg/Kg)	TCE (µg/Kg)
CS-3 0.5-3.5'	02/06/13	<25.0	<25.0
CS-3 4-5.5'	02/06/13	<25.0	<25.0
CS-4 0.5-4.0'	02/06/13	<25.0	121
CS-4 4-5.5'	02/06/13	<25.0	41.8 J
CS-5 0.5-4.0'	02/06/13	<25.0	<25.0
CS-5 4-6'	02/06/13	<25.0	<25.0

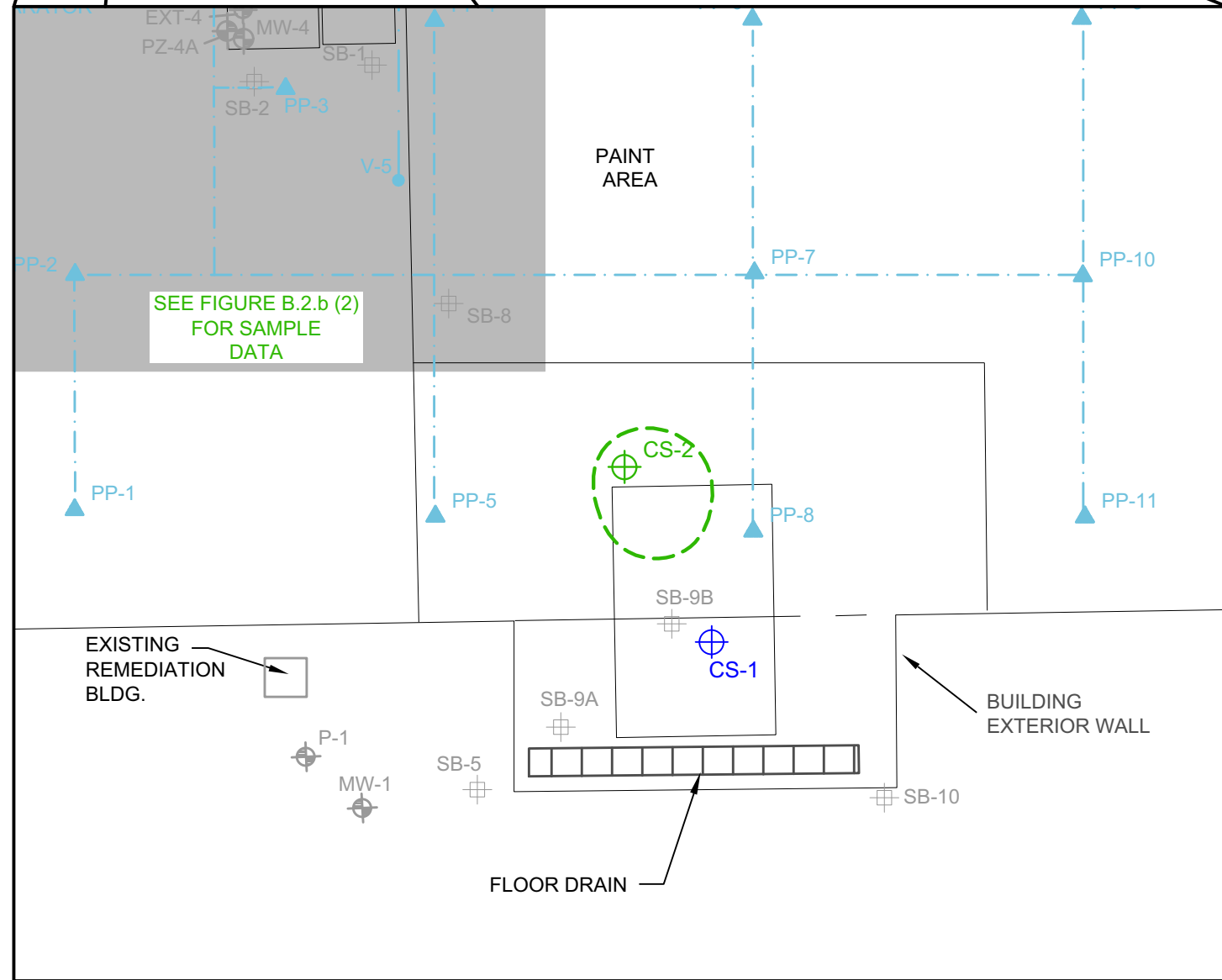
Soil to Groundwater Leaching Pathway  
 RCL Exceedances in are shown in Green

LEGEND

- CS-3 SOIL SAMPLING LOCATION (NOT EXCEEDING RCL)
- CS-4 SOIL SAMPLING LOCATION (RCL EXCEEDANCES)
- APPROX. EXTENT OF SOIL EXCEEDING SOIL-TO-GROUNDWATER LEACHING PATHWAY RCL
- V-1 EXISTING VAPOR EXTRACTION LOCATION
- PZ-4A EXISTING MONITORING WELL LOCATION
- VAPOR EXTRACTION SYSTEM
- PP-5 VAPOR EXTRACTION POINT







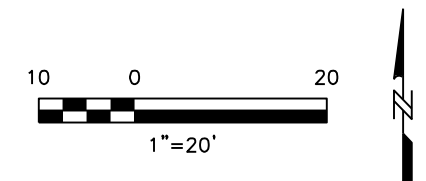
SEE FIGURE B.2.b (2)  
FOR SAMPLE  
DATA

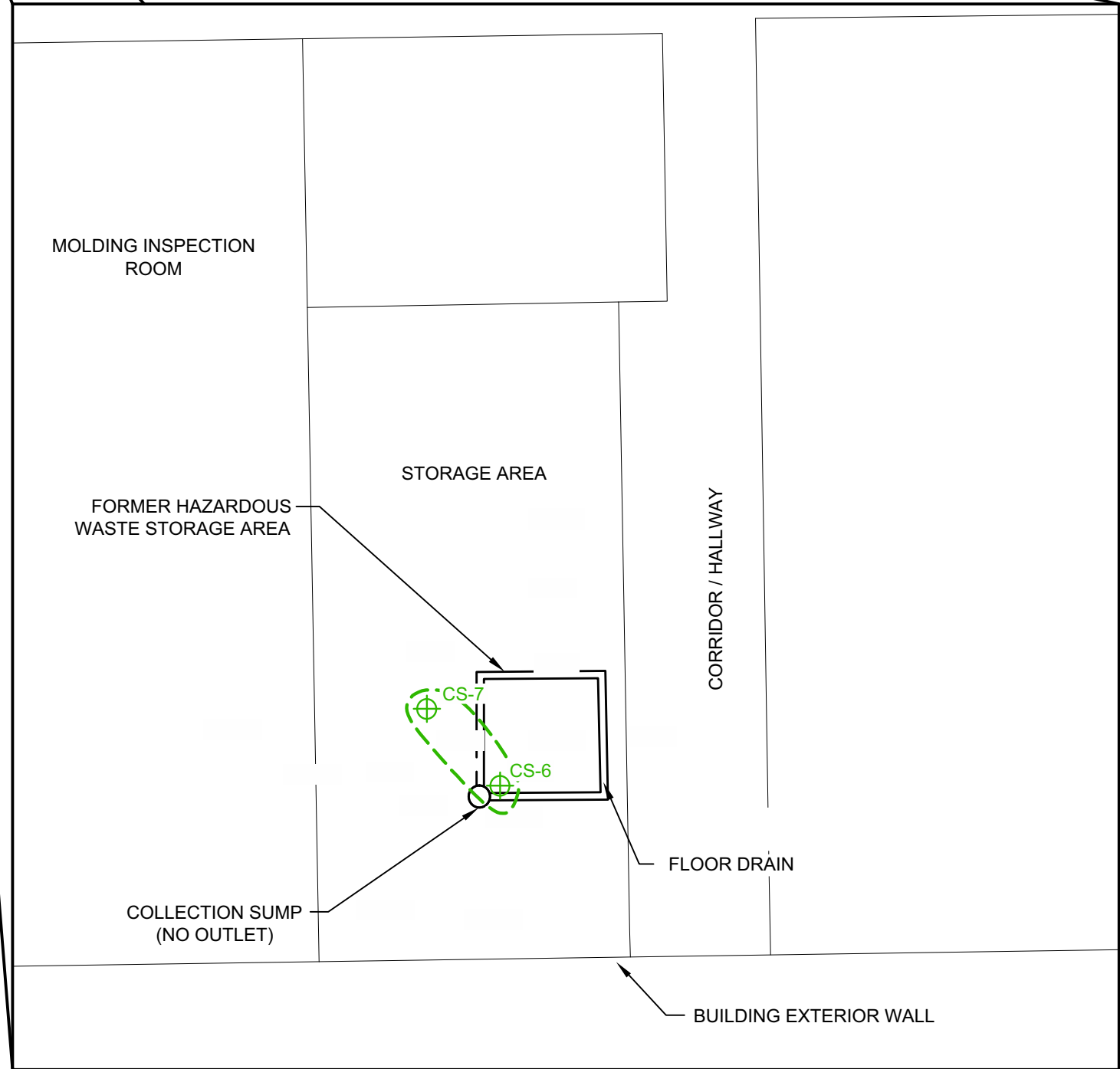
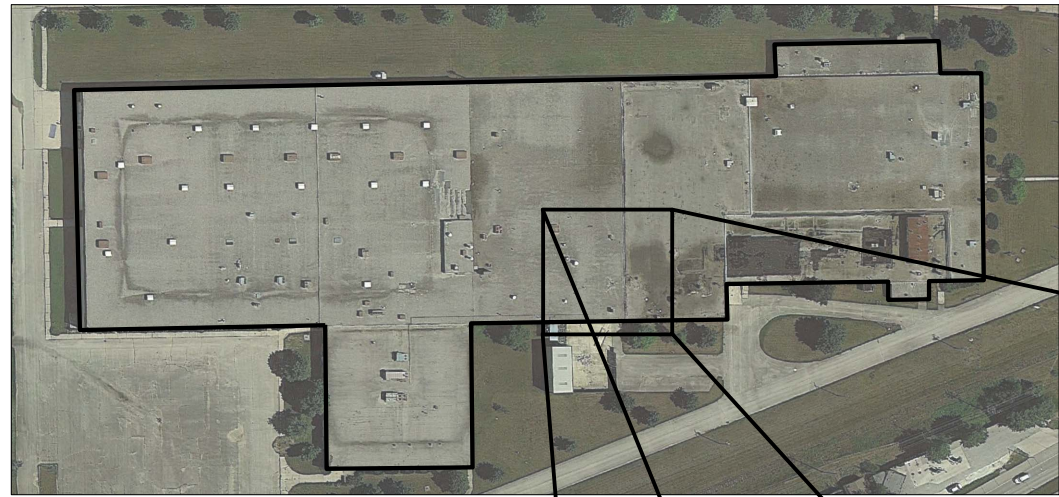
Former Paint Area			
Soil Sample	Date	PCE (µg/Kg)	TCE (µg/Kg)
CS-1 0.5-4.0'	02/06/13	<25.0	<25.0
CS-1 4-6'	02/06/13	<25.0	<25.0
CS-2 0.5-4'	02/06/13	<25.0	73.4
CS-2 4-6'	02/06/13	<25.0	<25.0

Soil to Groundwater Leaching Pathway RCL  
 Exceedances in are shown in Green

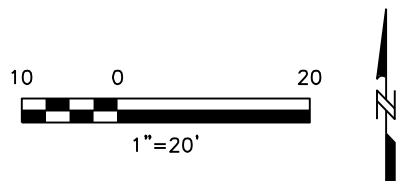
LEGEND

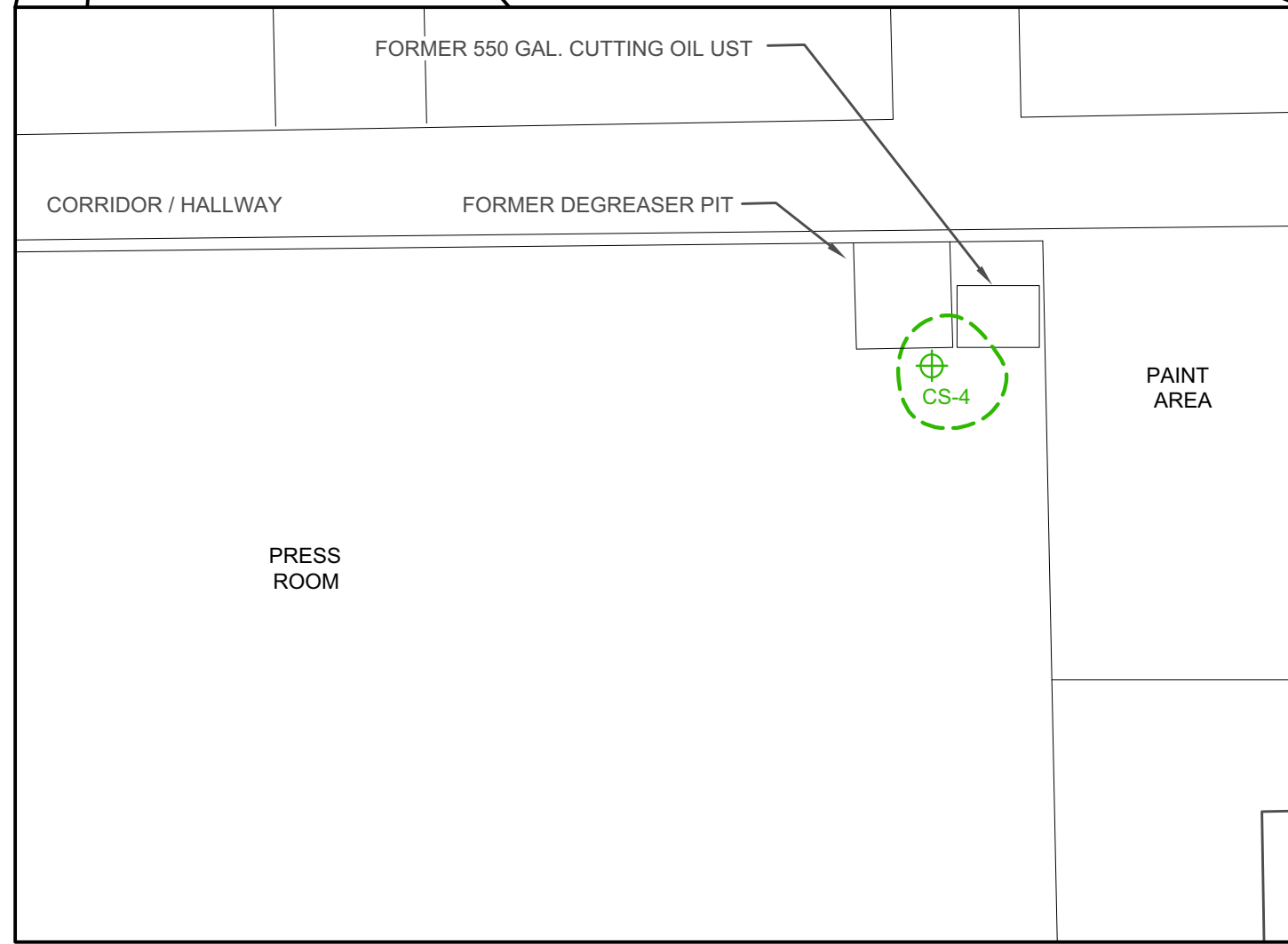
- CS-1 (blue circle with crosshair) SOIL SAMPLING LOCATION (NOT EXCEEDING RCL)
- CS-2 (green circle with crosshair) SOIL SAMPLING LOCATION (RCL EXCEEDANCES)
- (dashed green circle) APPROX. EXTENT OF SOIL EXCEEDING SOIL-TO-GROUNDWATER LEACHING PATHWAY RCL
- (dashed blue line) VAPOR EXTRACTION SYSTEM
- PP-8 (blue triangle) VAPOR EXTRACTION POINT





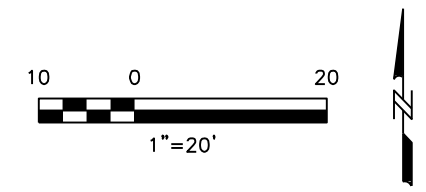
LEGEND	
	CS-6 SOIL SAMPLING LOCATION (RCL EXCEEDANCES)
	APPROX. EXTENT OF SOIL EXCEEDING SOIL-TO-GROUNDWATER LEACHING PATHWAY RCL

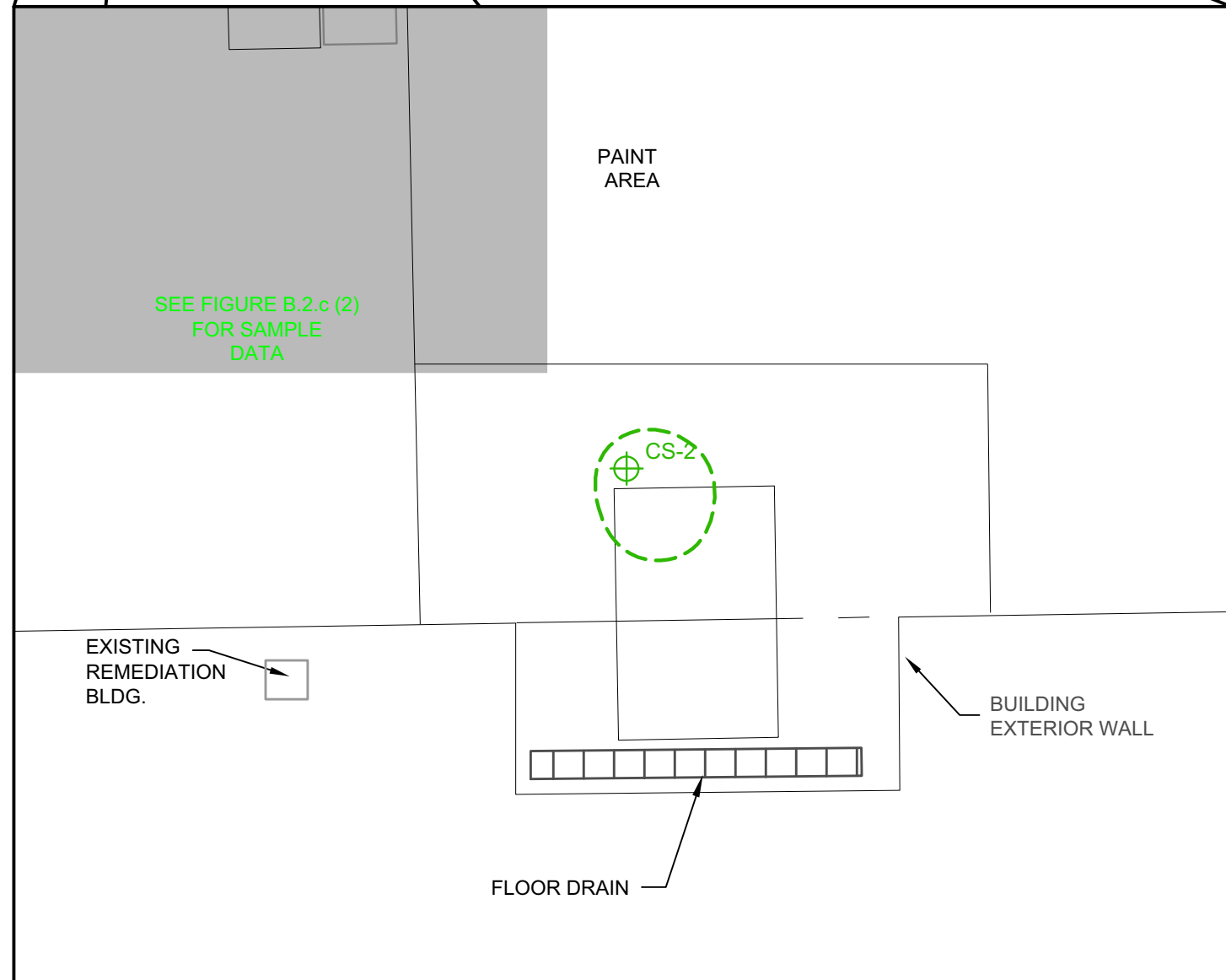




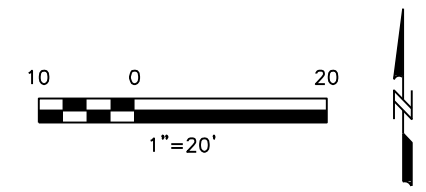
**LEGEND**

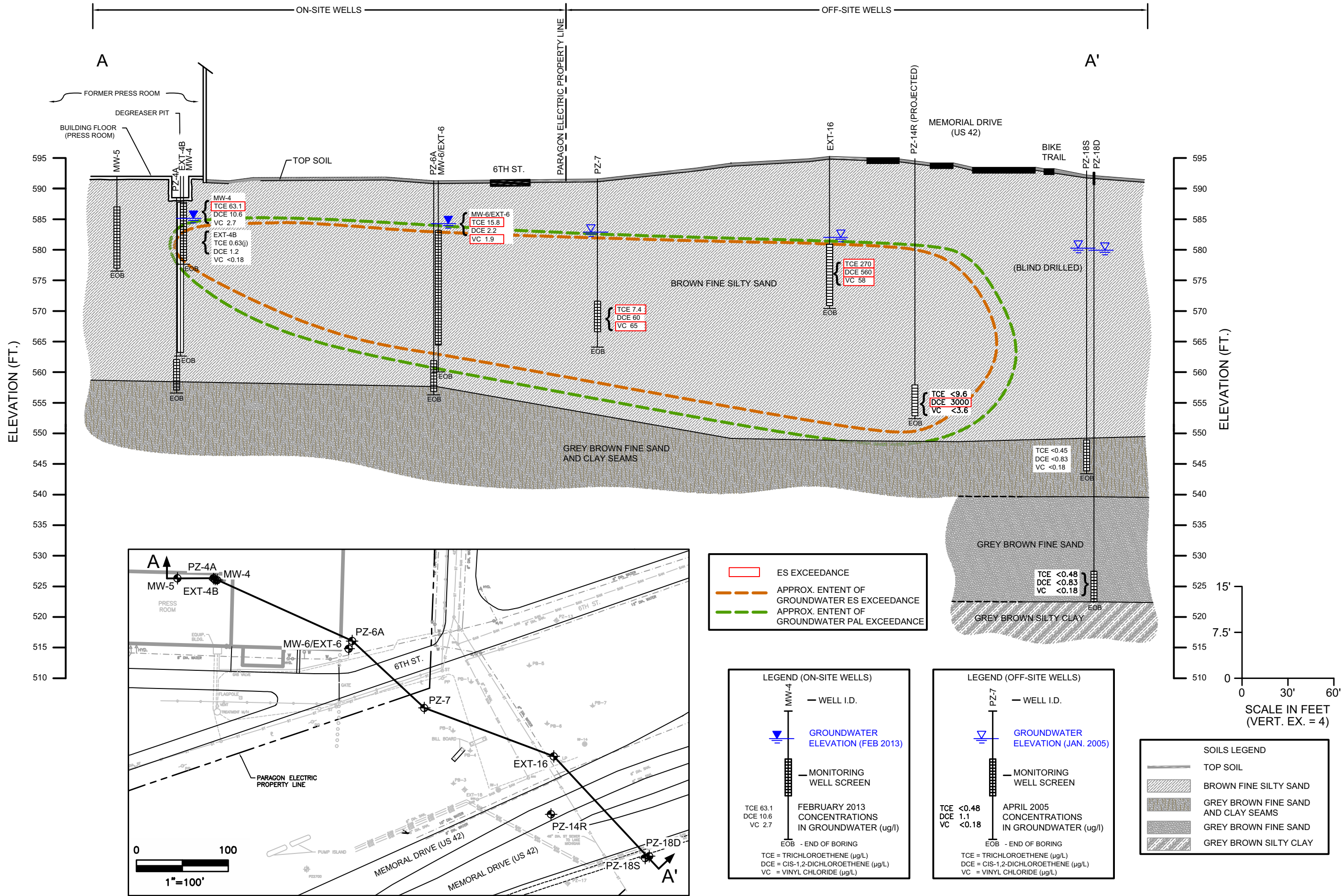
- CS-4 SOIL SAMPLING LOCATION (RCL EXCEEDANCES)
- APPROX. EXTENT OF SOIL EXCEEDING SOIL-TO-GROUNDWATER LEACHING PATHWAY RCL

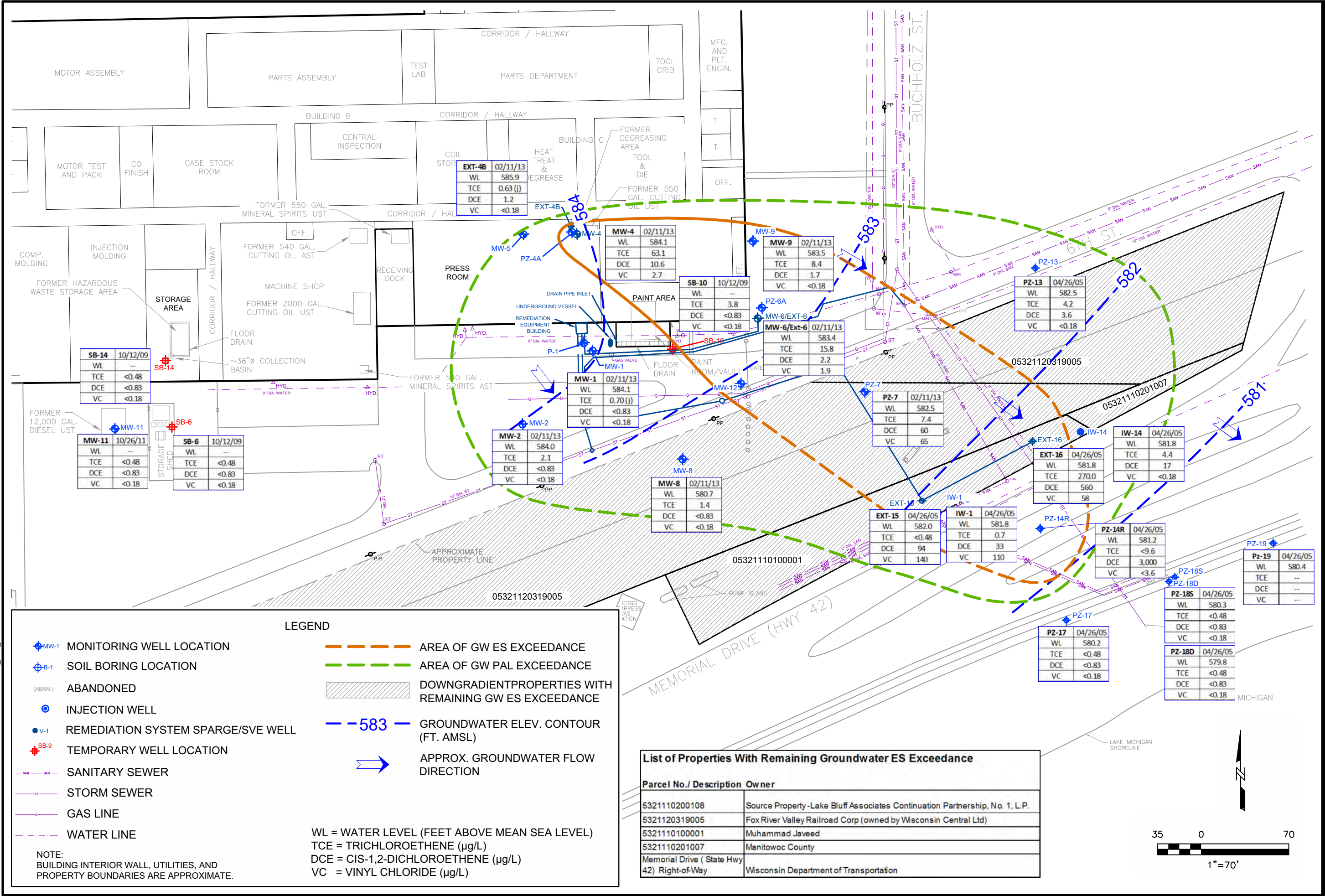


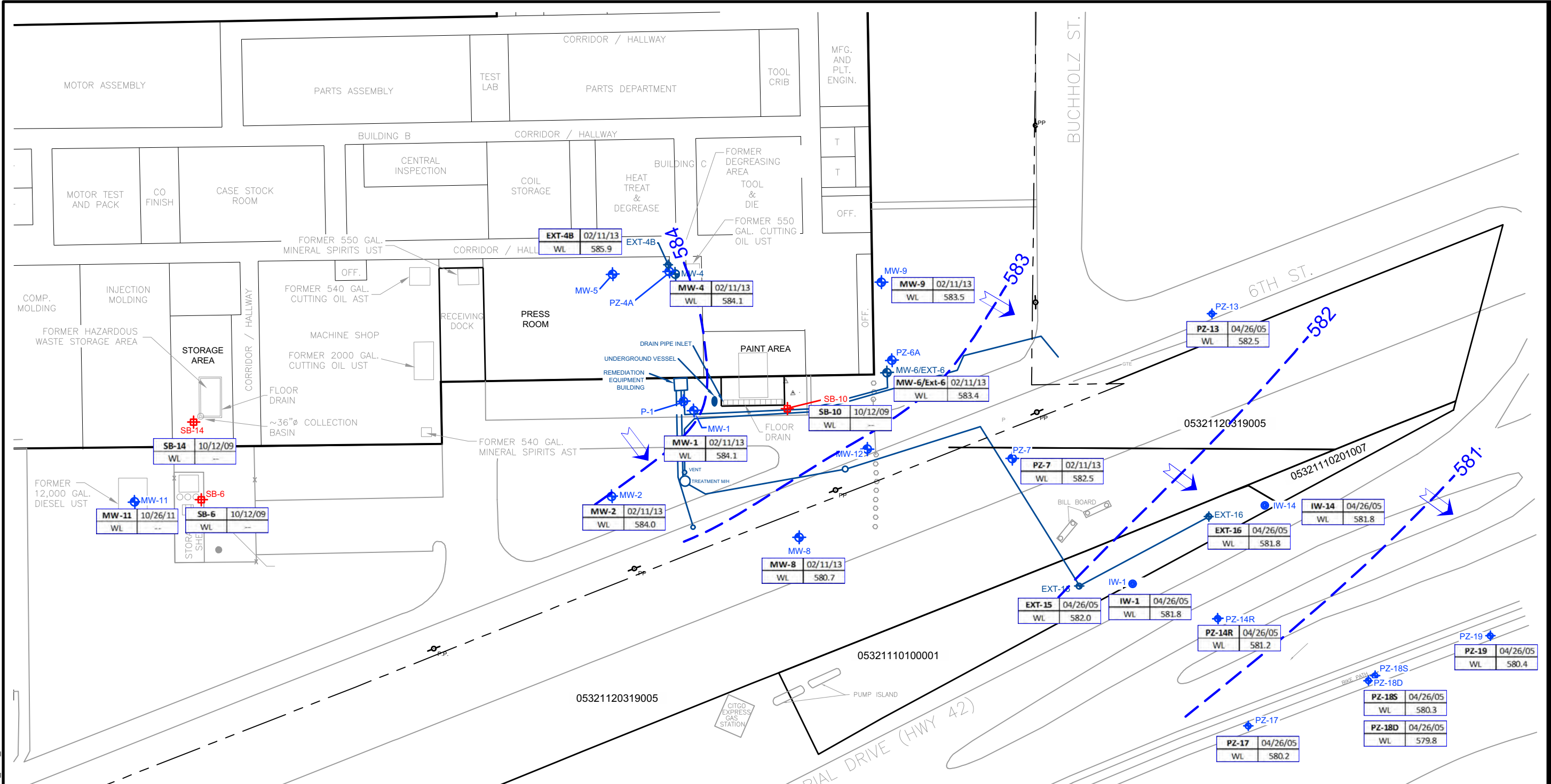


LEGEND	
	SOIL SAMPLING LOCATION (RCL EXCEEDANCES)
	APPROX. EXTENT OF SOIL EXCEEDING SOIL-TO-GROUNDWATER LEACHING PATHWAY RCL





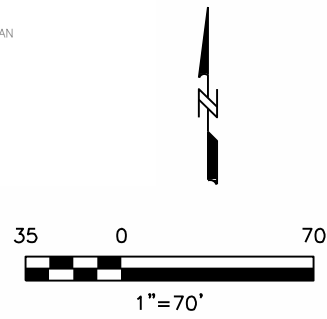


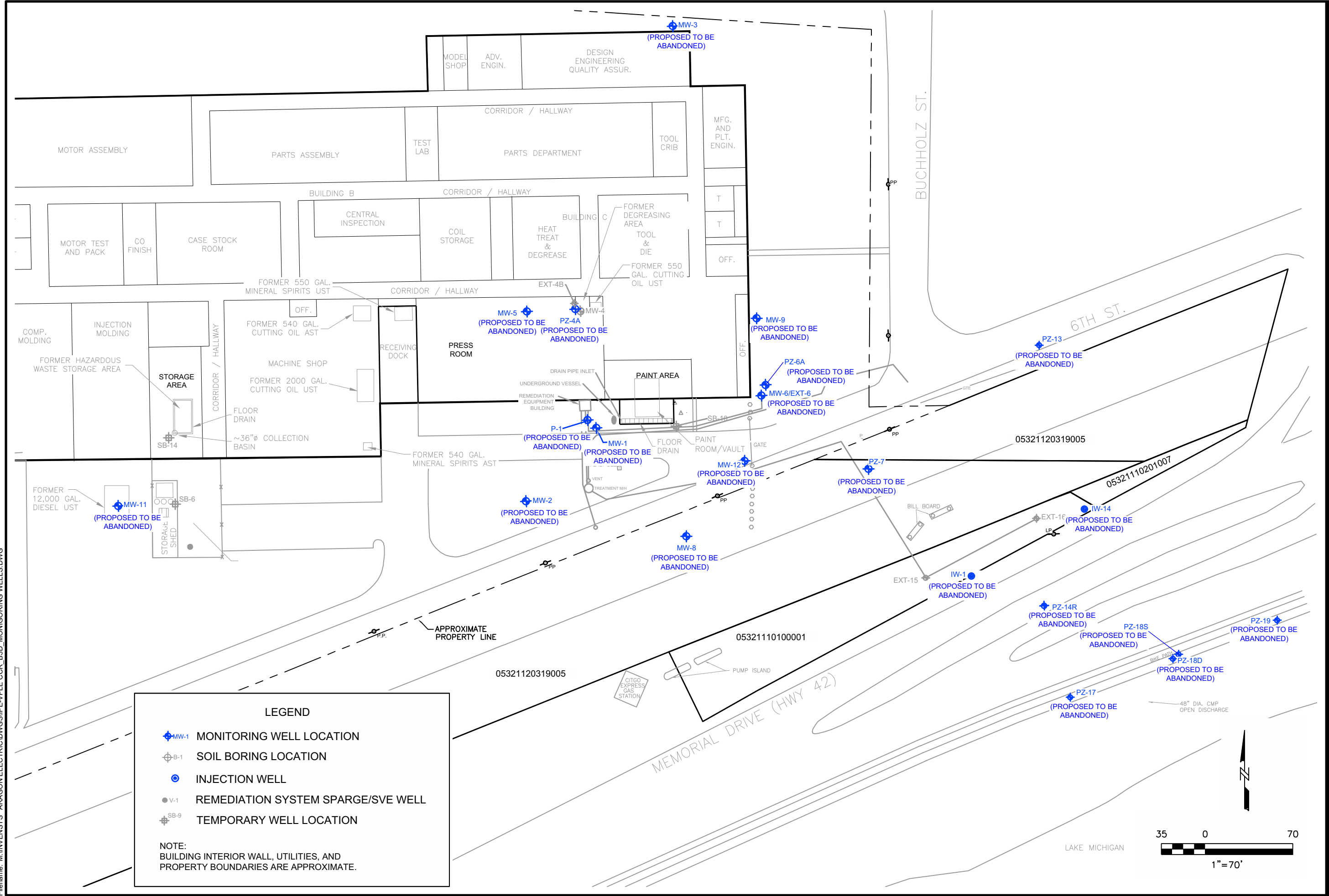


**LEGEND**

- ◆ MW-1 MONITORING WELL LOCATION
- ⊕ B-1 SOIL BORING LOCATION
- (ABAN.) ABANDONED
- INJECTION WELL
- V-1 REMEDIATION SYSTEM SPARGE/SVE WELL
- ⊕ SB-9 TEMPORARY WELL LOCATION
- 583 --- GROUNDWATER ELEV. CONTOUR (FT. AMSL)
- ➔ APPROX. GROUNDWATER FLOW DIRECTION
- WL = WATER LEVEL (FEET ABOVE MEAN SEA LEVEL)

**NOTE:**  
 BUILDING INTERIOR WALL, UTILITIES, AND PROPERTY BOUNDARIES ARE APPROXIMATE.



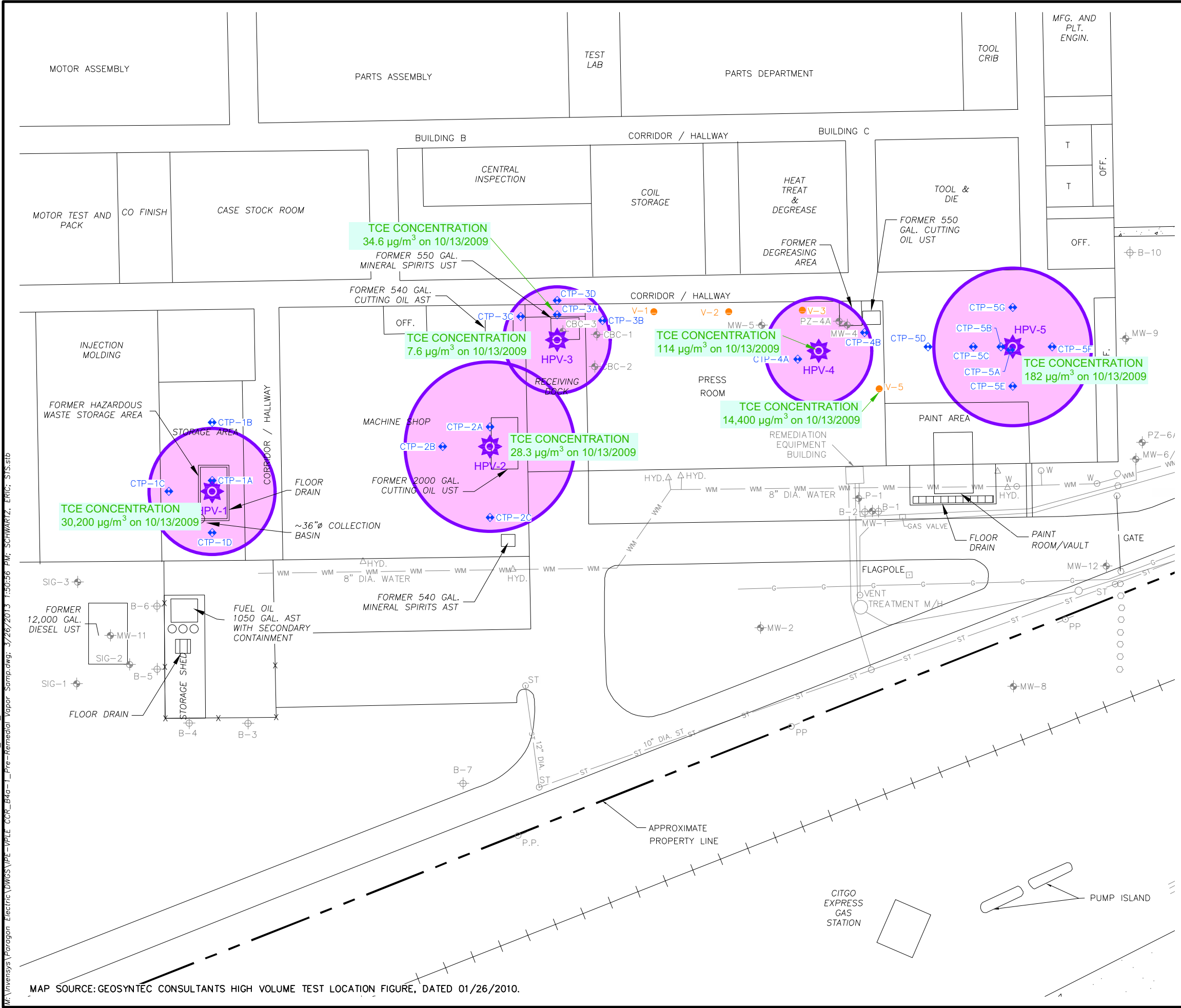


**LEGEND**

- ◆ MW-1 MONITORING WELL LOCATION
- ⊕ B-1 SOIL BORING LOCATION
- INJECTION WELL
- V-1 REMEDIATION SYSTEM SPARGE/SVE WELL
- ⊕ SB-9 TEMPORARY WELL LOCATION

**NOTE:**  
 BUILDING INTERIOR WALL, UTILITIES, AND  
 PROPERTY BOUNDARIES ARE APPROXIMATE.

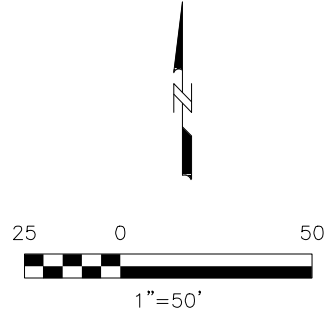




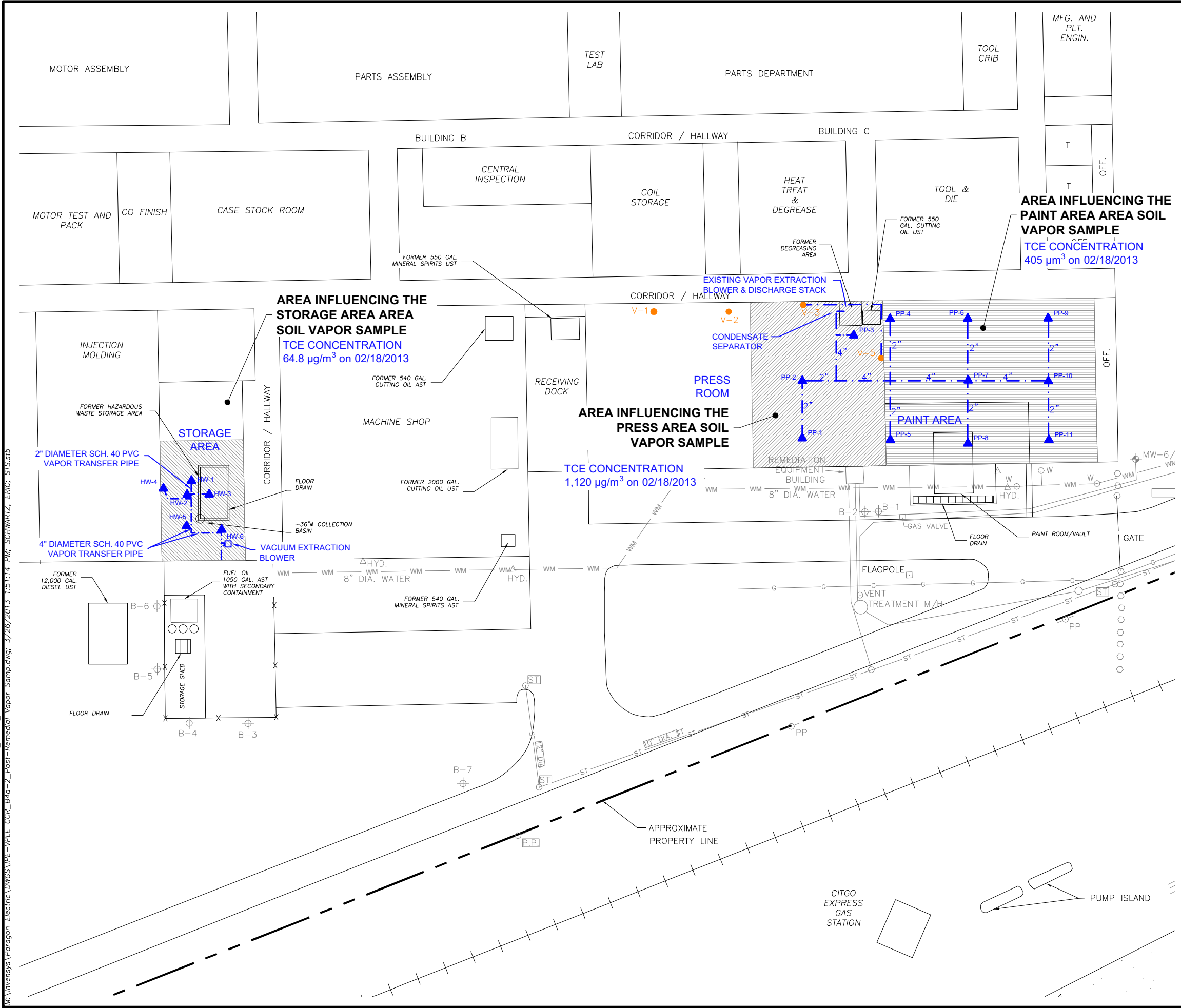
**LEGEND**

- SAN — SANITARY SEWER
- ST — STORM SEWER
- G — GAS LINE
- WM — WATER LINE
- ⊕ MW-1 MONITORING WELL LOCATION
- ⊕ B-1 SOIL BORING LOCATION
- V-1 REMEDIATION SYSTEM SPARGE/SVE WELL
- ⊕ CTP-1A COMMUNICATION TEST POINT
- ⊕ HPV-1 HIGH PURGE VOLUME SUB-SLAB SAMPLE LOCATION (CALCULATED RADIUS OF GAS EXTRACTED)

**NOTE:**  
 BUILDING INTERIOR WALL, UTILITIES, AND PROPERTY BOUNDARIES ARE APPROXIMATE.



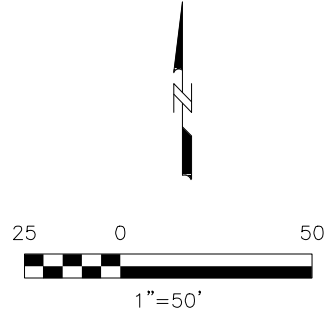
MAP SOURCE: GEOSYNTEC CONSULTANTS HIGH VOLUME TEST LOCATION FIGURE, DATED 01/26/2010.



**LEGEND**

- SAN — SANITARY SEWER
- ST — STORM SEWER
- G — GAS LINE
- WM — WATER LINE
- B-1 MONITORING WELL LOCATION
- ⊕ B-1 SOIL BORING LOCATION
- V-1 REMEDIATION SYSTEM SPARGE/SVE WELL
- ▲ VAPOR EXTRACTION LOCATION
- VACUUM BLOWER
- - - VAPOR TRANSFER PIPE (SCH 40 PVC)

**NOTE:**  
 BUILDING INTERIOR WALL,  
 UTILITIES, AND PROPERTY  
 BOUNDARIES ARE APPROXIMATE.



## Documentation of Remedial Action (Attachment C)

# DISCLAIMER

Documents contained in Attachment C of the Case Closure – GIS Registry (Form 4400-202) are not included in the electronic version (GIS Registry Packet) available on RR Sites Map to limit file size.

For information on how to obtain a copy or to review the file, please contact the Remediation & Redevelopment (RR) Environmental Program Associate (EPA) at [dnr.wi.gov/topic/Brownfields/Contact.html](http://dnr.wi.gov/topic/Brownfields/Contact.html)



## **ATTACHMENT D – Maintenance Plan**

Cover Barrier Maintenance Plan



## ATTACHMENT D : Cover Barrier Maintenance Plan

Paragon Electric Site, Two Rivers, Wisconsin

WDNR BRRTS No. 02-36-000153

### PROPERTY LOCATED AT:

606 Parkway Boulevard, Two Rivers, Wisconsin (the "Property")

**PROPERTY LEGAL DESCRIPTION:** NW 1/4 NE 1/4 & NE 1/4 NE 1/ 2 OF S11 T19N R24E PT OF SUB GOVT LOT 1 LYING N OF C & N W RR ROW ALSO SW 1/4 SE 1/4 S2 T19N R24E TRACTS REC IN V 256 P 261 & V 499 P 327 OF DEEDS ALSO THIEDE& GOELE D ALL OF BLK 3 & VAC STREET IN V 249 P 197 OF DEEDS

**PARCEL TAX #:** 053-211-102-001.08

### Introduction

The Wisconsin Department of Natural Resources ("DNR") has approved closure of the remedial project at the Property to industrial standards with, which is often the case in industrial remediation projects, the installation and maintenance of a cover barrier over three limited locations in the building located at the Property. This document constitutes the Maintenance Plan required by s. NR 724.13(2), Wisconsin Administrative Code for the cover barrier at the Property, which will consist of the concrete floor of the Property's existing building.

More site-specific information about this Property may be found in: (i) the case file in the DNR Northeast regional office; (ii) BRRTS on the Web (DNR's internet based data base of contaminated sites): <http://dnr.wi.gov/botw/SetUpBasicSearchForm.do> (iii) GIS Registry PDF file for further information on the nature and extent of contamination: <http://dnrmaps.wisconsin.gov/imf/imf.jsp?site=brrts2>; and (iv) the DNR project manager for Manitowoc County.

### Soil Description

Residual low level impacts of trichloroethene and tetrachloroethene (chlorinated solvents) are located at a depth of 0 to 6 feet in the soil in several places at the Property, as shown on the attached Exhibit A (Figure D.1). DNR desires to minimize the soil-to-groundwater leaching of these solvents through the maintenance of a cover barrier, and has acknowledged that such soil may remain in place provided that a cover barrier, such as the concrete slab of the Property's existing building, is maintained.

### Description of the Cover Barrier and Maintenance Activities

The cover barrier consists of the approximately 6-inch thick concrete floor slab in the Property's existing building. The areas of the cover barrier to be maintained are in the southeast portion of the building, specifically in the Storage, Press, and Paint areas, as shown in Exhibit A (the "Designated Areas"). The cover barrier over the Designated Areas will be inspected by the owner or its designated representative once a year for deterioration, cracks and other potential problems that may result in leaching of the solvents noted above into underlying groundwater. Any needed repairs to the said cover barrier will be promptly scheduled and completed by the owner. A log of the inspections and any repairs and recommendations will be maintained by the owner at the Property and is included as Exhibit B, Cap Inspection Log. The inspection log will be available for submittal to or inspection by DNR representatives upon their request.] Any soil that is excavated from the Designated Areas must be tested, treated, and disposed of by the owner in accordance with applicable law. If any portion of the cover barrier overlying any portion of the Designated Areas is removed or replaced, the replacement barrier must be equally impervious and subject to the same maintenance and inspection guidelines outlined in this

Maintenance Plan (unless indicated otherwise by the DNR or its successor). The owner will maintain a copy of this Maintenance Plan at the Property and make it available to all interested parties (i.e. on-site employees, contractors, future owners, etc.). This Maintenance Plan can be amended or withdrawn by the owner and its successors with the written approval of WDNR.

Notwithstanding the above, the owner will not modify the cover barrier over the Designated Areas in a manner that will adversely affect the soil-to-groundwater leaching pathway of the above cited solvents unless prior written approval has been obtained from the DNR.

### **Contact Information**

#### Responsible Party:

Mr. Paul A. Ahearn  
Ranco Incorporated of Delaware c/o Invensys Inc.  
33 Commercial Street, B51-2J  
Foxboro, Massachusetts 02035  
Phone: (508) 549-4949

#### Owner:

Lake Bluff Associates Continuation Partnership, No. 1, L.P.  
c/o Rabbi Yitzchok Wolf  
SJ Abrams Cheder Lubavitch Hebrew Day School  
Central Office  
5201 Howard Street  
Skokie, Illinois 60077  
Phone: 847-675-6777

#### Consultant:

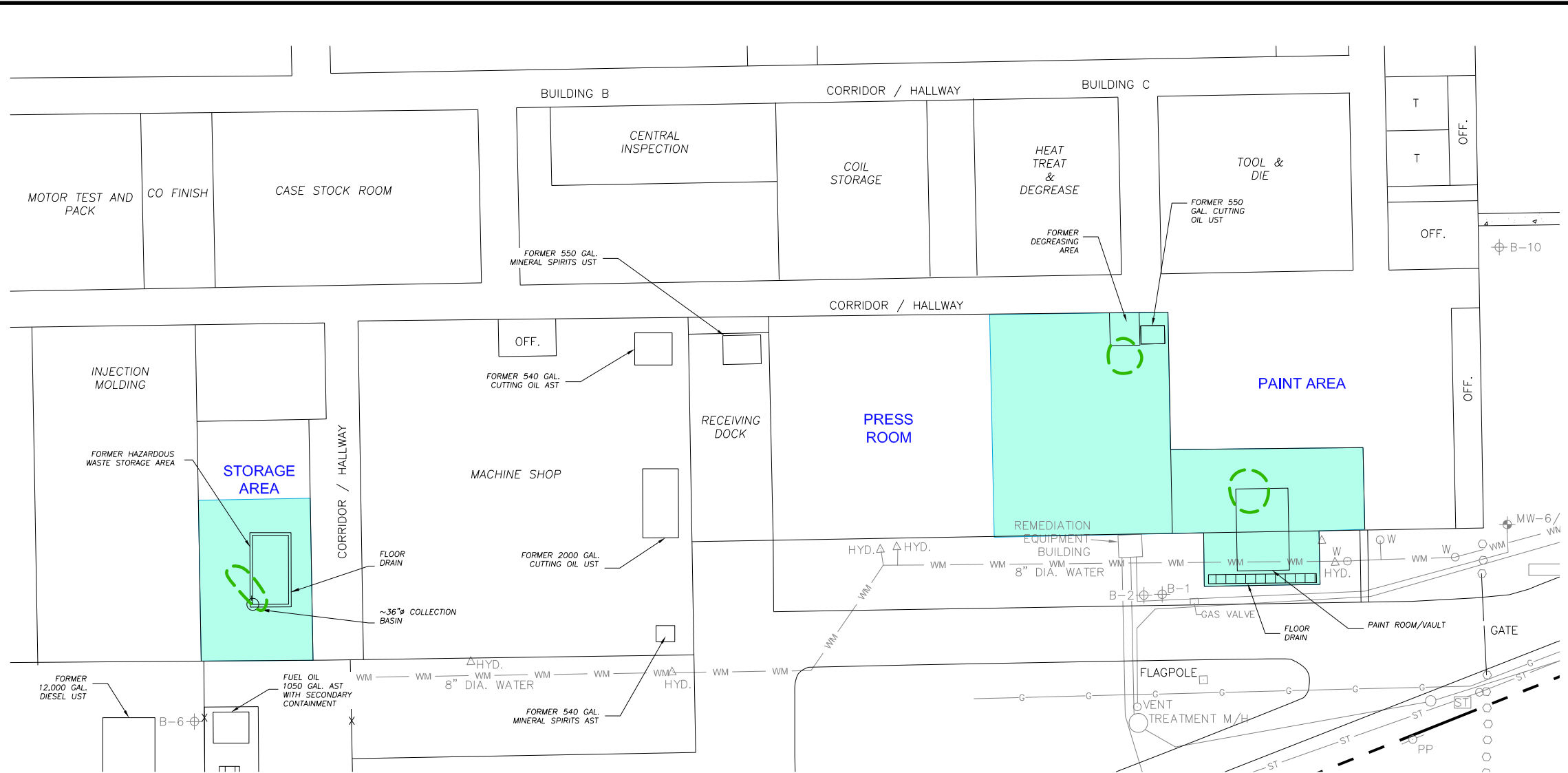
Mr. Mark W. Magee  
AECOM  
1035 Kepler Drive  
Green Bay, Wisconsin 54311  
Phone: (920) 406-3141

Or

Ms. Vasanta M. Kalluri  
AECOM  
717, 17<sup>th</sup> Street, Suite 2600  
Denver, Colorado 80202  
Phone: (303) 228-3058

#### DNR:

Ms. Annette Weissbach  
Wisconsin Department of Natural Resources  
2984 Shawano Avenue  
Green Bay, Wisconsin 54307-0448  
Phone: (920) 662-5165



**LEGEND**

- SAN — SANITARY SEWER
- ST — STORM SEWER
- G — GAS LINE
- WM — WATER LINE
- APPROX. EXTENT OF REMAINING SOIL EXCEEDING SOIL-TO-GROUNDWATER LEACHING PATHWAY
- AREA OF FLOOR MAINTENANCE (ENGINEERED BARRIER FOR GROUNDWATER INFILTRATION)

**NOTE:**  
 BUILDING INTERIOR WALL, UTILITIES, AND PROPERTY BOUNDARIES ARE APPROXIMATE.



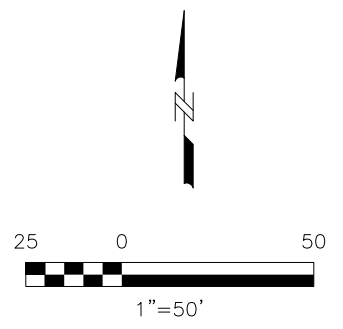
STORAGE ROOM



PRESS ROOM



PAINT ROOM



**Exhibit B**  
**Cover Barrier Inspection Log**  
**Former Paragon Electric Facility**  
**Two Rivers, Wisconsin**  
**WDNR BRRTS No. 02-36-000153**

Inspection Date	Inspector	Condition of Cover Barrier	Recommendations	Have recommendations from previous inspection been implemented



## **ATTACHMENT E – MONITORING WELL INFORMATION**

No Attachments – All wells were identified for proper abandonment





SOURCE  
PROPERTY

William J. Anaya  
312.876.7109  
[wjanaya@arnstein.com](mailto:wjanaya@arnstein.com)  
Direct Facsimile: 312.876.7309  
Licensed in Illinois and Indiana

March 1, 2013

**VIA MESSENGER DELIVERY**

Lake Bluff Associates Continuation Partnership, No. 1, L.P.  
c/o Rabbi Yitzchok Wolf  
SJ Abrams Cheder Lubavitch Hebrew Day School  
Central Office  
5201 Howard Street  
Skokie, Illinois 60077

**Subject: Notice of Completion of Remedial Activities, Application for WDNR Closure; Description of Groundwater Conditions at Real Property commonly known as 606 Parkway Boulevard, Two Rivers, Wisconsin (the "Site"), WDNR BRRS VPLE No. 06-36-551669, ERP No. 02-36-00153**  
**Our Client: Ranco Incorporated of Delaware**

Gentlemen:

This letter is to advise you that Ranco Incorporated of Delaware has completed all of the active remedial activities at the Site required by Wisconsin Environmental Law and by Section 5.6(b)(vii) of the Lease, and is in the process of confirming administrative closure of the Site with the Wisconsin Department of Natural Resources ("WDNR") pursuant to the state's voluntary cleanup program.

Specifically, our client has completed all of the required remediation and corrective action activities at the Site, and is in the process of removing the remediation equipment and properly closing the monitoring wells used in performing the remedial activities at the Site. For your benefit and for our client's benefit, our client is also applying for a Certificate of Completion pursuant to Wisconsin's Voluntary Party Liability Exemption (VPLE) confirming that no further remediation activities are required at the Site.

As you know, our client entered the VPLE Program in June 2008 following WDNR's conditional closure of the Site following a TCE release reported and resolved at that time. As you may know, closure pursuant to the VPLE Program, exempts the current and future owners of the Site from statutory environmental cleanup liability under Wisconsin law for the contaminants of concern identified in the closure report –

Lake Bluff Associates Continuation Partnership, No. 1, L.P.

Re: Notice of Completion of Remediation at  
666 Parkway Boulevard, Two Rivers, Wisconsin

March 1, 2013

Page 2

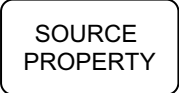
provided that continuing post-closure obligations are followed. Those continuing obligations will impose certain restrictions on use of the subsurface and groundwater at the Site, and will be described in a letter from WDNR confirming closure. For your review and reference, we have attached a Voluntary Party Liability Exemption Fact Sheet (PUB-RR-506) and Answers to Common Questions about the Voluntary Party Liability Exemption (VPLE) Program.

For your information, our client's environmental consultant has concluded that after nearly a decade of active groundwater remediation, certain residual material left in the groundwater at the Site in the form of trichloroethene ("TCE"), and its degradation by products will remain at concentrations that currently exceed standards found in chapter NR 140, Wisconsin Administrative Code. Nonetheless our client's consultant has concluded (consistent with WDNR closure requirements), that the residual material will not pose a danger at the Site so long as certain continuing obligations consistent with the current use of the Site are in place.

As you know, our client has removed the majority of the contaminants of concern identified at the Site with active remedial activities performed since the late 1980's. At this point, it is our client's consultant's considered opinion that the residual material will naturally attenuate and biodegrade over time, reducing the concentrations of TCE in the groundwater at the Site to well below the standards found in chapter NR 140, Wisconsin Administrative Code. In the meantime, the floors in the Storage, Paint and Press Areas of the building provide adequate and recognized barriers to subsurface conditions in those areas and must be maintained. In addition, the prospective use of the Site will remain industrial as contemplated in the Lease. At this point, our client's consultant has concluded that the current conditions at the Site – including the residual TCE in the groundwater at the Site – do not pose any danger to human health or to the environment. In other words, the conditions at the Site are both compliant with Wisconsin environmental law and are compliant with the closure terms described in the Lease.

As you may know, the natural processes of attenuation and biodegradation are consistent with the administrative requirements for formal closure described at Chapter NR 726, of the Wisconsin Administrative Code. At such time as WDNR formally closes the Site pursuant to the terms of our client's application, no further investigation or cleanup will be performed, required or initiated beyond reliance on natural attenuation.

We are sending you this notice and the attachments pursuant to Wisconsin Administrative Code Chapter NR 726.05(2). For your information, WDNR will not review our client's closure request for at least 30 days following the date of this letter. As the owner of the Site under consideration, if you have contradictory information, you



Lake Bluff Associates Continuation Partnership, No. 1, L.P.  
Re: Notice of Completion of Remediation at  
666 Parkway Boulevard, Two Rivers, Wisconsin  
March 1, 2013  
Page 3

may contact WDNR and provide the Agency with any technical information that contradicts our client's application for VLPE closure.

If you have any such information, you may submit it to WDNR by addressing it as follows:

Ms. Annette Weissbach  
Wisconsin Department of Natural Resources  
Northeast Region Headquarters  
2984 Shawano Avenue  
Green Bay, Wisconsin 54313-6727

For your information, after the Site is closed as described in this letter, the boundaries of the groundwater identified with residual contamination known to exceed the standards established at chapter NR 140 will be reported on WDNR's Geographic Information System (GIS) Registry of Closed Remediation Sites. The information reported on the GIS Registry includes maps identifying the location of various properties in Wisconsin with groundwater that contains material at concentrations that exceed the standards established at chapter NR 140. This GIS Registry is available to the general public, and reported publicly on WDNR's internet web site.

At such time as WDNR approves our client's application for closure under the VPLE Program, WDNR will report closure in a letter to our client. Upon receipt, we will provide a copy of the letter to you, or you may obtain a copy from Ms. Annette Weissbach, WDNR, 2984 Shawano Avenue, Green Bay, Wisconsin 54313-6727, or by accessing the DNR GIS Registry of Closed Remediation Sites on the internet at <http://www.dnr.wi.gov/org/aw/rr/gis/index.htm>.

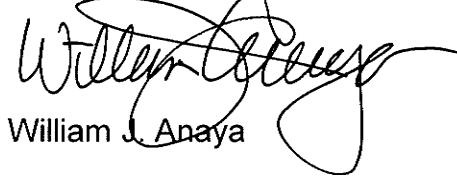
Finally, in the event that you, or any subsequent owner of the Site, intends to construct or reconstruct a groundwater well at the Site, please be advised that special well construction standards will be applicable to protect the well from the residual TCE remaining in the groundwater, at least until the concentrations naturally attenuate and biodegrade as described above. Every well driller who proposes to construct a well at the Site will need to verify the groundwater conditions at the Site, and if the exceedances described in this letter remain, the well driller will be required to obtain approval from a regional water supply specialist with WDNR's Drinking Water and Groundwater Program. The well construction application, form 3300-254, is available at WDNR's web site at <http://www.dnr.wi.gov/org/water/dwg/3300254.pdf>, or may be accessed through the GIS Registry web address in the preceding paragraph.

Lake Bluff Associates Continuation Partnership, No. 1, L.P.  
Re: Notice of Completion of Remediation at  
666 Parkway Boulevard, Two Rivers, Wisconsin  
March 1, 2013  
Page 4

Please review this letter and the attachments, and if you require additional information, please feel free to contact the undersigned.

Very truly yours,

Arnstein & Lehr LLP

A handwritten signature in black ink, appearing to read "William J. Anaya", written over the typed name below.

William J. Anaya

WJA:cle  
10790950.1

cc: Mr. Lawrence F. Benjamin/Neal, Gerber & Eisenberg (with attachments)

SOURCE  
PROPERTY

## Chicago Office Services

---

**From:** mark@advancedmessenger.com  
**Sent:** Friday, March 01, 2013 12:55 PM  
**To:** Turner, Gregory  
**Subject:** POD for Control Number 330008

Advanced Messenger Service

ATTN: AARON

CTRL: 330008    ORDER DATE: 3/01/13    SERVICE TYPE: IMM SUB  
CUST: 2809 ARNSTEIN & LEHR LLP    REF: 396470011 WJA

PU: ARNSTEIN & LEHR LLP    DL: CHEDER LUBAVITCH SCHOOL  
120 S RIVERSIDE PLZ    5201 W HOWARD  
CHICAGO    IL 60606-3910    SKOKIE    IL  
RM:1200    USA    USA

DEL DATE: 3/01/13    TIME: 12:54    SIGN: r. zucker



OFF-SOURCE  
B  
PROPERTY

William J. Anaya  
312.876.7109  
[wjanaya@arnstein.com](mailto:wjanaya@arnstein.com)  
Direct Facsimile: 312.876.7309  
Licensed in Illinois and Indiana

March 28, 2013

**VIA CERTIFIED MAIL –  
RETURN RECEIPT REQUESTED**

Wisconsin Central Railroad  
c/o Canadian National Railroad  
Real Estate Department  
17641 South Ashland Avenue  
Homewood, Illinois 60430

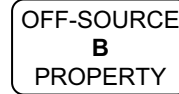
**Re: Notice of Application for Closure at Real Property commonly described as 606 Parkway Boulevard, Two Rivers, Wisconsin (the “Site”); Description of Groundwater Conditions at Parcel No. 053-211-203-190.05; WDNR BRRTS VPLE No. 06-36-551669, ERP No. 02-36-00153  
Our Client: Ranco Incorporated of Delaware**

Dear Sir or Madam:

This letter is to advise you per Wisconsin Environmental Law of possible residual groundwater impacts on Railroad’s Right-of-Way property (Parcel No. 053-211-203-190.05) located south of the former Paragon Electric Facility (the “Site”) at 606 Parkway Boulevard, Two Rivers, Wisconsin (see attached Drawing for location). Ranco Incorporated of Delaware has completed all of the active remedial activities at the Site required by Wisconsin Environmental Law, and is in the process of confirming administrative closure of the Site with the Wisconsin Department of Natural Resources (“WDNR”) pursuant to the state’s voluntary cleanup program. Our client is applying for a Certificate of Completion pursuant to Wisconsin’s Voluntary Party Liability Exemption (“VPLE”) confirming that no further remediation activities are required at the Site.

For your information, our client’s environmental consultant has concluded that after nearly a decade of active groundwater remediation, the remediation activities are complete with certain residual material left in the groundwater at the Site in the form of trichloroethene (“TCE”) and its degradation by products will remain. Those residual materials will remain at concentrations that currently exceed standards found in chapter NR 140, Wisconsin Administrative Code, and some of that material is migrating through the groundwater beneath the Site into the subsurface at the Railroad’s Right-of-Way (drawing attached). Even so, our client’s consultant has concluded (consistent with





Wisconsin Central Ltd.  
March 28, 2013  
Page 2

WDNR closure requirements), that the residual material does pose a danger at the Site or to your property interests, and will eventually degrade. The purpose of this notice is to advise you of the presence of the material and to advise you of certain requirements imposed by Wisconsin environmental law.

Again, please be advised that our client's consultant has concluded that the current conditions associated with residual TCE in the groundwater do not pose any danger to human health or to the environment at your property. Indeed, the current conditions at the Site and at your property are compliant with Wisconsin environmental law. At such time as WDNR formally closes the Site pursuant to the terms of our client's currently pending application, no further investigation or cleanup will be performed, required or initiated beyond reliance on natural attenuation.

We are sending you this notice and the attachments pursuant to Wisconsin Administrative Code Chapter NR 726.05(2). For your information, WDNR will not review our client's closure request for at least 30 days following the date of this letter. If, as the owner of property adjacent to the Site, you have contradictory information, you may contact WDNR and provide the Agency with any technical information that contradicts our client's application for VLPE closure.

If you have any such information, you may submit it to WDNR by addressing it as follows:

Ms. Annette Weissbach  
Wisconsin Department of Natural Resources  
Northeast Region Headquarters  
2984 Shawano Avenue  
Green Bay, Wisconsin 54313-6727

For your information, after the Site is closed as described in this letter, the boundaries of the groundwater identified with residual contamination known to exceed the standards established at chapter NR 140 will be reported on WDNR's Geographic Information System (GIS) Registry of Closed Remediation Sites. The information reported on the GIS Registry includes maps identifying the location of various properties in Wisconsin with groundwater that contains material at concentrations that exceed the standards established at chapter NR 140. This GIS Registry is available to the general public, and reported publicly on WDNR's internet web site. We have attached a copy of a drawing identifying the location of properties that are known to have been impacted by the TCE described above. Our client also provided a copy of this drawing to WDNR, and WDNR may use it or the information described therein in preparing the information to be disclosed in the GIS referred to above.

At such time as WDNR approves our client's pending application for closure under the VPLE Program, WDNR will report closure in a letter to our client. Upon

Wisconsin Central Ltd.  
March 28, 2013  
Page 3

receipt, we will provide a copy of the letter to you, or you may obtain a copy from Ms. Annette Weissbach, WDNR, 2984 Shawano Avenue, Green Bay, Wisconsin 54313-6727, or by accessing the DNR GIS Registry of Closed Remediation Sites on the internet at <http://www.dnr.wi.gov/org/aw/rr/gis/index.htm>.

Finally, in the event that you, or any subsequent owner of your property, intends to construct or reconstruct a groundwater well at your property, please be advised that special well construction standards will be applicable to protect the well from the residual TCE remaining in the groundwater, at least until the concentrations naturally attenuate and biodegrade as described above. Every well driller who proposes to construct a well at your property will need to verify the groundwater conditions, and if the exceedances described in this letter remain, the well driller will be required to obtain approval from a regional water supply specialist with WDNR's Drinking Water and Groundwater Program. The well construction application, form 3300-254, is available at WDNR's web site at <http://www.dnr.wi.gov/org/water/dwg/3300254.pdf>, or may be accessed through the GIS Registry web address in the preceding paragraph.

Please review this letter and the attachments, and if you require additional information, please feel free to contact the undersigned.

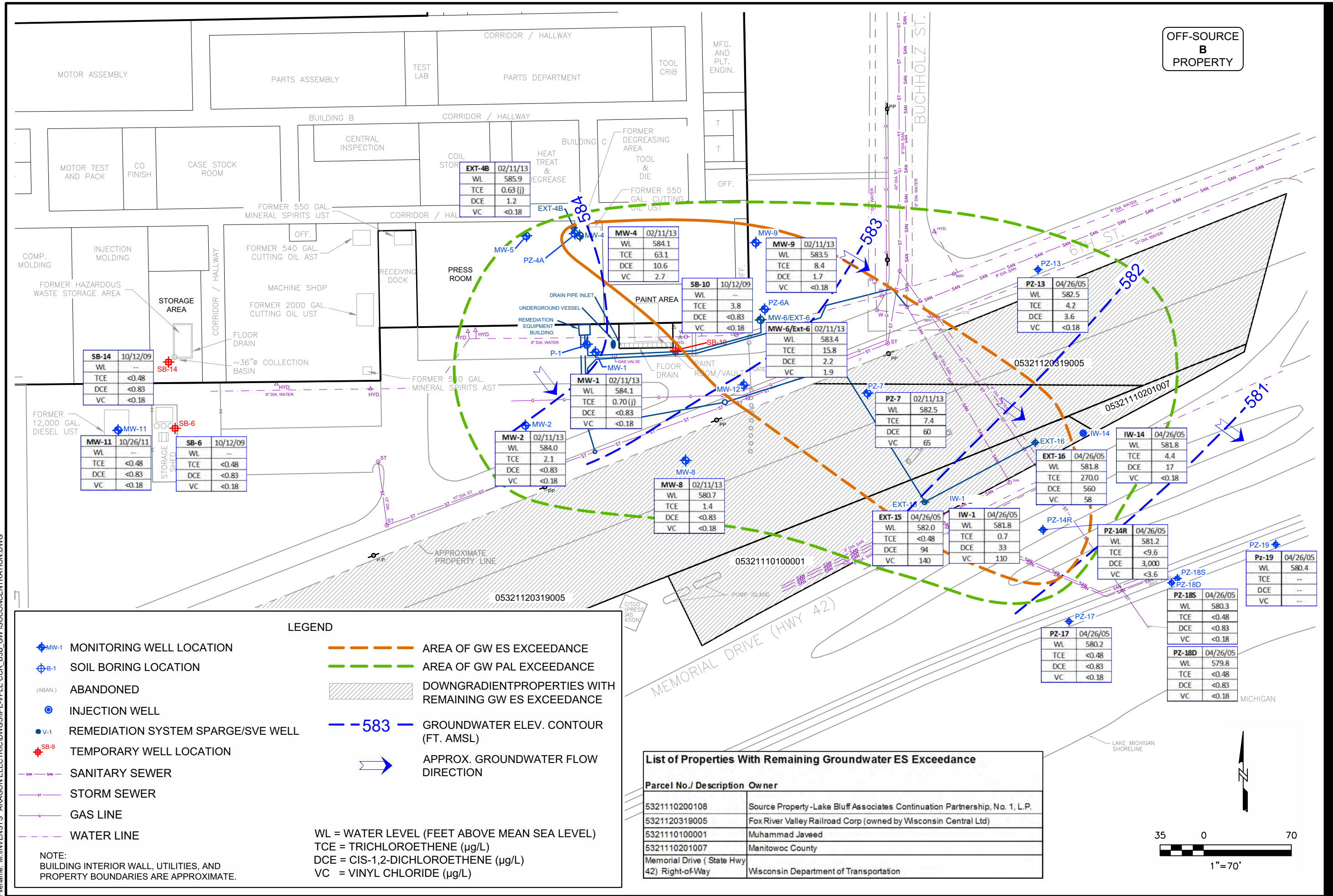
Very truly yours,

Arnstein & Lehr LLP

/s/ William J. Anaya

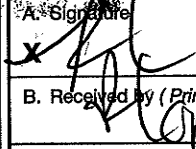

William J. Anaya

WJA/cle  
10852717.1



Parcel No./ Description	Owner
5321110200108	Source Property -Lake Bluff Associates Continuation Partnership, No. 1, L.P.
5321120319005	Fox River Valley Railroad Corp (owned by Wisconsin Central Ltd)
5321110100001	Muhammad Javeed
5321110201007	Manitowoc County
Memorial Drive ( State Hwy 42) Right-of-Way	Wisconsin Department of Transportation

OFF-SOURCE  
B  
PROPERTY

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"><li>■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</li><li>■ Print your name and address on the reverse so that we can return the card to you.</li><li>■ Attach this card to the back of the mailpiece, or on the front if space permits.</li></ul>	A. Signature 	
	<input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee	
1. Article Addressed to:	B. Received by (Printed Name) 	C. Date of Delivery 4-8-13
Wisconsin Central Railroad c/o Canadian National Railroad Real Estate Department 17641 South Ashland Avenue Homewood, Illinois 60430	D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No	
	3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.	
2. Article Number (Transfer from service label)	4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes	
	7008 1140 0004 3547 8745	
PS Form 3811, February 2004	Domestic Return Receipt	102595-02-M-1540



William J. Anaya  
312.876.7109  
[wjanaya@arnstein.com](mailto:wjanaya@arnstein.com)  
Direct Facsimile: 312.876.7309  
Licensed in Illinois and Indiana

March 28, 2013

**VIA CERTIFIED MAIL –  
RETURN RECEIPT REQUESTED**



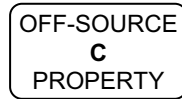
Mr. Muhammad Javeed  
Mrs. Tahira Javeed  
3308 Chasm Lane  
Manitowoc, Wisconsin 54220

**Re: Notice of Application for Closure at Real Property commonly described as 606 Parkway Boulevard, Two Rivers, Wisconsin (the “Site”); Description of Groundwater Conditions at 2626 Memorial Drive, Two Rivers, Wisconsin; WDNR BRRTS VPLE No. 06-36-551669, ERP No. 02-36-00153  
Our Client: Ranco Incorporated of Delaware**

Dear Mr. and Mrs. Javeed:

This letter is to advise you per Wisconsin Environmental Law of possible residual groundwater impacts on your property commonly known as 2626 Memorial Drive in Two Rivers, Wisconsin (Parcel No. 053-211-102-010.07) located south of the former Paragon Electric Facility (the “Site”) at 606 Parkway Boulevard, Two Rivers, Wisconsin. Please refer to the attached drawing for location. Ranco Incorporated of Delaware has completed all of the active remedial activities at the Site required by Wisconsin Environmental Law, and is in the process of confirming administrative closure of the Site with the Wisconsin Department of Natural Resources (“WDNR”) pursuant to the state’s voluntary cleanup program. Our client is applying for a Certificate of Completion pursuant to Wisconsin’s Voluntary Party Liability Exemption (“VPLE”) confirming that no further remediation activities are required at the Site.

For your information, our client’s environmental consultant has concluded that after nearly a decade of active groundwater remediation, the remediation activities are complete with certain residual material left in the groundwater at the Site in the form of trichloroethene (“TCE”) and its degradation by products. Those residual materials will remain at concentrations that currently exceed standards found in chapter NR 140, Wisconsin Administrative Code, and some of that material is migrating through the groundwater beneath the Site into the subsurface at your property commonly known as 2626 Memorial Drive, Two Rivers, Wisconsin (drawing attached). Even so, our client’s



Mr. Javeed Muhammed  
Mrs. Tahira Javeed  
March 28, 2013  
Page 2

consultant has concluded (consistent with WDNR closure requirements), that the residual material does pose a danger at the Site or to your property interests, and will eventually biodegrade over time. The purpose of this notice is to advise you of the presence of the material and to advise you of certain requirements imposed by Wisconsin environmental law.

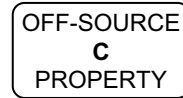
Please be advised that our client's consultant has concluded that the current conditions associated with residual TCE in the groundwater do not pose any danger to human health or to the environment at your property. Indeed, the current conditions at the Site and at your property are compliant with Wisconsin environmental law. At such time as WDNR formally closes the Site pursuant to the terms of our client's currently pending application, no further investigation or cleanup will be performed, required or initiated beyond reliance on natural attenuation.

We are sending you this notice and the attachments pursuant to Wisconsin Administrative Code Chapter NR 726.05(2). For your information, WDNR will not review our client's closure request for at least 30 days following the date of this letter. If, as the owner of property adjacent to the Site, you have contradictory information, you may contact WDNR and provide the Agency with any technical information that contradicts our client's application for VLPE closure.

If you have any such information, you may submit it to WDNR by addressing it as follows:

Ms. Annette Weissbach  
Wisconsin Department of Natural Resources  
Northeast Region Headquarters  
2984 Shawano Avenue  
Green Bay, Wisconsin 54313-6727

For your information, after the Site is closed as described in this letter, the boundaries of the groundwater identified with residual contamination known to exceed the standards established at chapter NR 140 will be reported on WDNR's Geographic Information System (GIS) Registry of Closed Remediation Sites. The information reported on the GIS Registry includes maps identifying the location of various properties in Wisconsin with groundwater that contains material at concentrations that exceed the standards established at chapter NR 140. This GIS Registry is available to the general public, and reported publicly on WDNR's internet web site. We have attached a copy of a drawing identifying the location of properties that are known to have been impacted by the TCE described above. Our client also provided a copy of this drawing to WDNR, and WDNR may use it or the information described therein in preparing the information to be disclosed in the GIS referred to above.



Mr. Javeed Muhammed  
Mrs. Tahira Javeed  
March 28, 2013  
Page 3

At such time as WDNR approves our client's pending application for closure under the VPLE Program, WDNR will report closure in a letter to our client. Upon receipt, we will provide a copy of the letter to you, or you may obtain a copy from Ms. Annette Weissbach, WDNR, 2984 Shawano Avenue, Green Bay, Wisconsin 54313-6727, or by accessing the DNR GIS Registry of Closed Remediation Sites on the internet at <http://www.dnr.wi.gov/org/aw/rr/gis/index.htm>.

Finally, in the event that you, or any subsequent owner of your property, intends to construct or reconstruct a groundwater well at your property, please be advised that special well construction standards will be applicable to protect the well from the residual TCE remaining in the groundwater, at least until the concentrations naturally attenuate and biodegrade as described above. Every well driller who proposes to construct a well at your property will need to verify the groundwater conditions, and if the exceedances described in this letter remain, the well driller will be required to obtain approval from a regional water supply specialist with WDNR's Drinking Water and Groundwater Program. The well construction application, form 3300-254, is available at WDNR's web site at <http://www.dnr.wi.gov/org/water/dwg/3300254.pdf>, or may be accessed through the GIS Registry web address in the preceding paragraph.

Please review this letter and the attachments, and if you require additional information, please feel free to contact the undersigned.

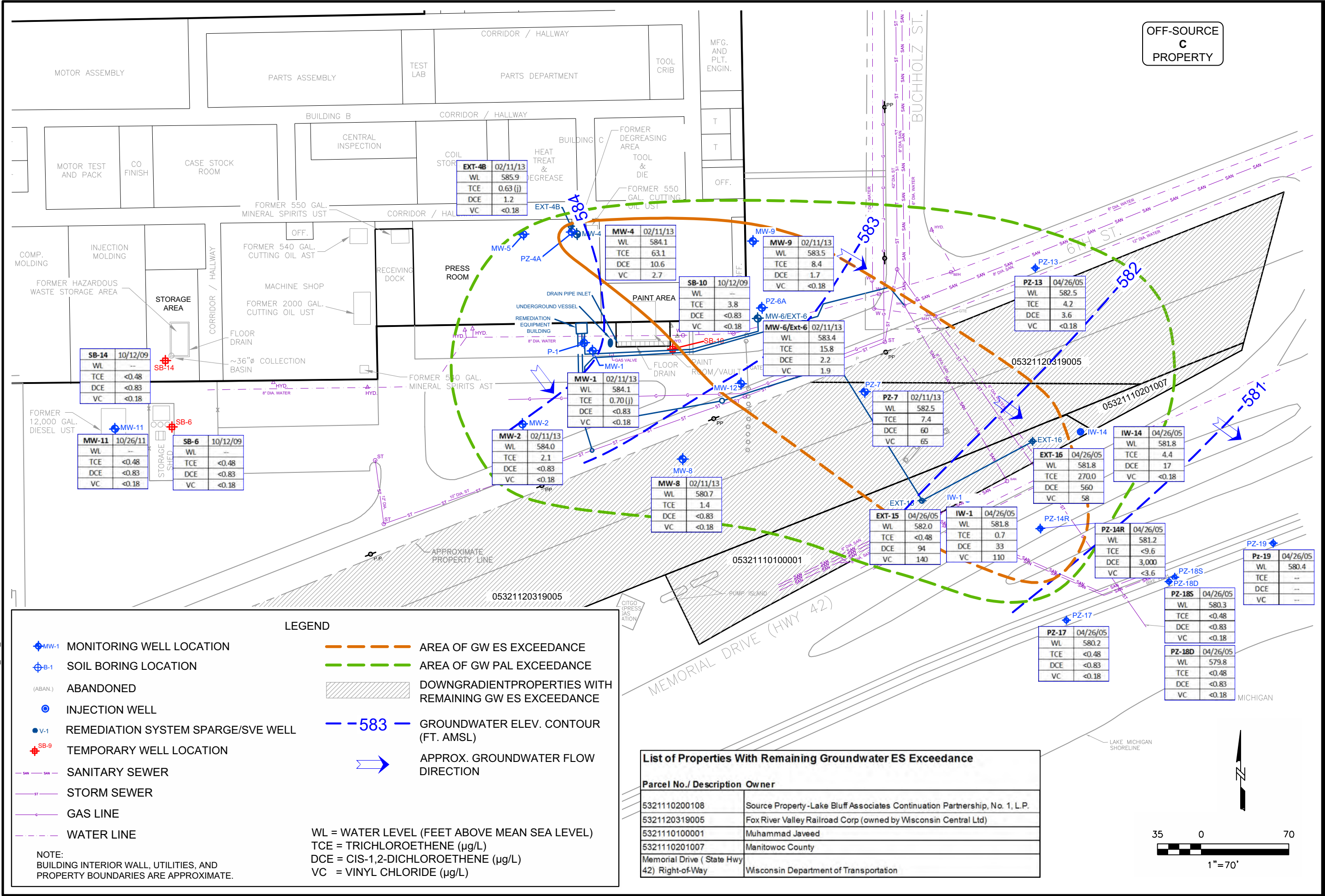
Very truly yours

Arnstein & Lehr LLP

/s/ William J. Anaya

William J. Anaya

WJA/cle  
10852765.1



OFF-SOURCE  
 C  
 PROPERTY

SB-14	10/12/09
WL	--
TCE	<0.48
DCE	<0.83
VC	<0.18

MW-11	10/26/11
WL	--
TCE	<0.48
DCE	<0.83
VC	<0.18

SB-6	10/12/09
WL	--
TCE	<0.48
DCE	<0.83
VC	<0.18

EXT-4B	02/11/13
WL	585.9
TCE	0.63 (j)
DCE	1.2
VC	<0.18

MW-4	02/11/13
WL	584.1
TCE	63.1
DCE	10.6
VC	2.7

MW-9	02/11/13
WL	583.5
TCE	8.4
DCE	1.7
VC	<0.18

SB-10	10/12/09
WL	--
TCE	3.8
DCE	<0.83
VC	<0.18

MW-6/EXT-6	02/11/13
WL	583.4
TCE	15.8
DCE	2.2
VC	1.9

PZ-13	04/26/05
WL	582.5
TCE	4.2
DCE	3.6
VC	<0.18

MW-2	02/11/13
WL	584.0
TCE	2.1
DCE	<0.83
VC	<0.18

MW-8	02/11/13
WL	580.7
TCE	1.4
DCE	<0.83
VC	<0.18

PZ-7	02/11/13
WL	582.5
TCE	7.4
DCE	60
VC	65

EXT-16	04/26/05
WL	581.8
TCE	270.0
DCE	560
VC	58

IW-14	04/26/05
WL	581.8
TCE	4.4
DCE	17
VC	<0.18

EXT-15	04/26/05
WL	582.0
TCE	<0.48
DCE	94
VC	140

IW-1	04/26/05
WL	581.8
TCE	0.7
DCE	33
VC	110

PZ-14R	04/26/05
WL	581.2
TCE	<9.6
DCE	3,000
VC	<3.6

PZ-19	04/26/05
WL	580.4
TCE	--
DCE	--
VC	--

PZ-18S	04/26/05
WL	580.3
TCE	<0.48
DCE	<0.83
VC	<0.18

PZ-17	04/26/05
WL	580.2
TCE	<0.48
DCE	<0.83
VC	<0.18

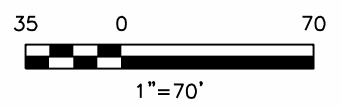
PZ-18D	04/26/05
WL	579.8
TCE	<0.48
DCE	<0.83
VC	<0.18

LEGEND

- MW-1 MONITORING WELL LOCATION
- SB-1 SOIL BORING LOCATION
- (ABAN.) ABANDONED
- INJECTION WELL
- V-1 REMEDIATION SYSTEM SPARGE/SVE WELL
- SB-9 TEMPORARY WELL LOCATION
- SANITARY SEWER
- STORM SEWER
- GAS LINE
- WATER LINE
- AREA OF GW ES EXCEEDANCE
- AREA OF GW PAL EXCEEDANCE
- DOWNGRADIENT PROPERTIES WITH REMAINING GW ES EXCEEDANCE
- 583- GROUNDWATER ELEV. CONTOUR (FT. AMSL)
- APPROX. GROUNDWATER FLOW DIRECTION

WL = WATER LEVEL (FEET ABOVE MEAN SEA LEVEL)  
 TCE = TRICHLOROETHENE (µg/L)  
 DCE = CIS-1,2-DICHLOROETHENE (µg/L)  
 VC = VINYL CHLORIDE (µg/L)

List of Properties With Remaining Groundwater ES Exceedance		
Parcel No./ Description	Owner	
5321110200108	Source Property - Lake Bluff Associates Continuation Partnership, No. 1, L.P.	
5321120319005	Fox River Valley Railroad Corp (owned by Wisconsin Central Ltd)	
5321110100001	Muhammad Javeed	
5321110201007	Manitowoc County	
Memorial Drive ( State Hwy 42) Right-of-Way	Wisconsin Department of Transportation	





OFF-SOURCE  
C  
PROPERTY

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"><li>■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</li><li>■ Print your name and address on the reverse so that we can return the card to you.</li><li>■ Attach this card to the back of the mailpiece, or on the front if space permits.</li></ul>	A. Signature <input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee <i>(X) MCB</i>	
	B. Received by ( <i>Printed Name</i> ) <i>+ Muhammad Javeed</i>	C. Date of Delivery <i>4-2-13</i>
1. Article Addressed to:  <p>Mr. Muhammad Javeed Mrs. Tahira Javeed 3308 Chasm Lane Manitowoc, Wisconsin 54220</p>	D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No	
	3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.	
	4. Restricted Delivery? ( <i>Extra Fee</i> ) <input type="checkbox"/> Yes	
2. Article Number ( <i>Transfer from service label</i> )	7008 1140 0004 3547 8721	

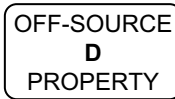
PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

OFF-SOURCE  
C  
PROPERTY

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"><li>■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</li><li>■ Print your name and address on the reverse so that we can return the card to you.</li><li>■ Attach this card to the back of the mailpiece, or on the front if space permits.</li></ul>	A. Signature x <i>Tahira</i> <input type="checkbox"/> Agent <input checked="" type="checkbox"/> Addressee	
1. Article Addressed to:  Mr. Muhammad Javeed Mrs. Tahira Javeed 3308 Chasm Lane Manitowoc, Wisconsin 54220	B. Received by (Printed Name) <b>TAHIRA</b>	C. Date of Delivery <b>4-8-13</b>
	D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No	
2. Article Number- (Transfer from service label)	3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.	
	4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes	
	7008 1140 0004 3547 8776	
PS Form 3811, February 2004	Domestic Return Receipt	102595-02-M-1540



William J. Anaya  
312.876.7109  
[wjanaya@arnstein.com](mailto:wjanaya@arnstein.com)  
Direct Facsimile: 312.876.7309  
Licensed in Illinois and Indiana

March 28, 2013

**VIA CERTIFIED MAIL –**  
**RETURN RECEIPT REQUESTED**

Wisconsin Department of Transportation  
944 Vanderperren Way  
Green Bay, Wisconsin 54304-5344

Attention: Mr. Will Dorsey, Director

**Re: Notice of Application for Closure at Real Property commonly described as 606 Parkway Boulevard, Two Rivers, Wisconsin (the “Site”); Description of Groundwater Conditions; WDNR BRRTS VPLE No. 06-36-551669, ERP No. 02-36-00153**  
**Our Client: Ranco Incorporated of Delaware**

Dear Mr. Dorsey:

This letter is to advise you that Ranco Incorporated of Delaware has completed all of the active remedial activities at the Site required by Wisconsin Environmental Law, and is in the process of confirming administrative closure of the Site with the Wisconsin Department of Natural Resources (“WDNR”) pursuant to the state’s voluntary cleanup program. Our client is applying for a Certificate of Completion pursuant to Wisconsin’s Voluntary Party Liability Exemption (“VPLE”) confirming that no further remediation activities are required at the Site.

For your information, our client’s environmental consultant has concluded that after nearly a decade of active groundwater remediation, the remediation activities are complete with certain residual material left in the groundwater at the Site in the form of trichloroethene (“TCE”) and its degradation by products will remain. Those residual materials will remain at concentrations that currently exceed standards found in chapter NR 140, Wisconsin Administrative Code, and some of that material is migrating through the groundwater beneath the Site into the subsurface at the Department of Transportation’s right-of-way (drawing attached). Even so, our client’s consultant has concluded (consistent with WDNR closure requirements), that the residual material does pose a danger at the Site or to your property interests, and will eventually biodegrade over time. The purpose of this notice is to advise you of the presence of the material and to advise you of certain requirements imposed by Wisconsin environmental law.

Wisconsin Department of Transportation  
Attention: Mr. Will Dorsey, Director  
March 28, 2013  
Page 2

Please be advised that our client's consultant has concluded that the current conditions associated with residual TCE in the groundwater do not pose any danger to human health or to the environment at your property. Indeed, the current conditions at the Site and at your property are compliant with Wisconsin environmental law. At such time as WDNR formally closes the Site pursuant to the terms of our client's currently pending application, no further investigation or cleanup will be performed, required or initiated beyond reliance on natural attenuation.

We are sending you this notice and the attachments pursuant to Wisconsin Administrative Code Chapter NR 726.05(2). For your information, WDNR will not review our client's closure request for at least 30 days following the date of this letter. If, as the owner of property adjacent to the Site, you have contradictory information, you may contact WDNR and provide the Agency with any technical information that contradicts our client's application for VLPE closure.

If you have any such information, you may submit it to WDNR by addressing it as follows:

Ms. Annette Weissbach  
Wisconsin Department of Natural Resources  
Northeast Region Headquarters  
2984 Shawano Avenue  
Green Bay, Wisconsin 54313-6727

For your information, after the Site is closed as described in this letter, the boundaries of the groundwater identified with residual contamination known to exceed the standards established at chapter NR 140 will be reported on WDNR's Geographic Information System (GIS) Registry of Closed Remediation Sites. The information reported on the GIS Registry includes maps identifying the location of various properties in Wisconsin with groundwater that contains material at concentrations that exceed the standards established at chapter NR 140. This GIS Registry is available to the general public, and reported publicly on WDNR's internet web site. We have attached a copy of a drawing identifying the location of properties that are known to have been impacted by the TCE described above. Our client also provided a copy of this drawing to WDNR, and WDNR may use it or the information described therein in preparing the information to be disclosed in the GIS referred to above.

At such time as WDNR approves our client's pending application for closure under the VPLE Program, WDNR will report closure in a letter to our client. Upon receipt, we will provide a copy of the letter to you, or you may obtain a copy from Ms. Annette Weissbach, WDNR, 2984 Shawano Avenue, Green Bay, Wisconsin 54313-6727, or by accessing the DNR GIS Registry of Closed Remediation Sites on the internet at <http://www.dnr.wi.gov/org/aw/rr/gis/index.htm>.

Wisconsin Department of Transportation  
Attention: Mr. Will Dorsey, Director  
March 28, 2013  
Page 3

Finally, in the event that you, or any subsequent owner of your property, intends to construct or reconstruct a groundwater well at your property, please be advised that special well construction standards will be applicable to protect the well from the residual TCE remaining in the groundwater, at least until the concentrations naturally attenuate and biodegrade as described above. Every well driller who proposes to construct a well at your property will need to verify the groundwater conditions, and if the exceedances described in this letter remain, the well driller will be required to obtain approval from a regional water supply specialist with WDNR's Drinking Water and Groundwater Program. The well construction application, form 3300-254, is available at WDNR's web site at <http://www.dnr.wi.gov/org/water/dwg/3300254.pdf>, or may be accessed through the GIS Registry web address in the preceding paragraph.

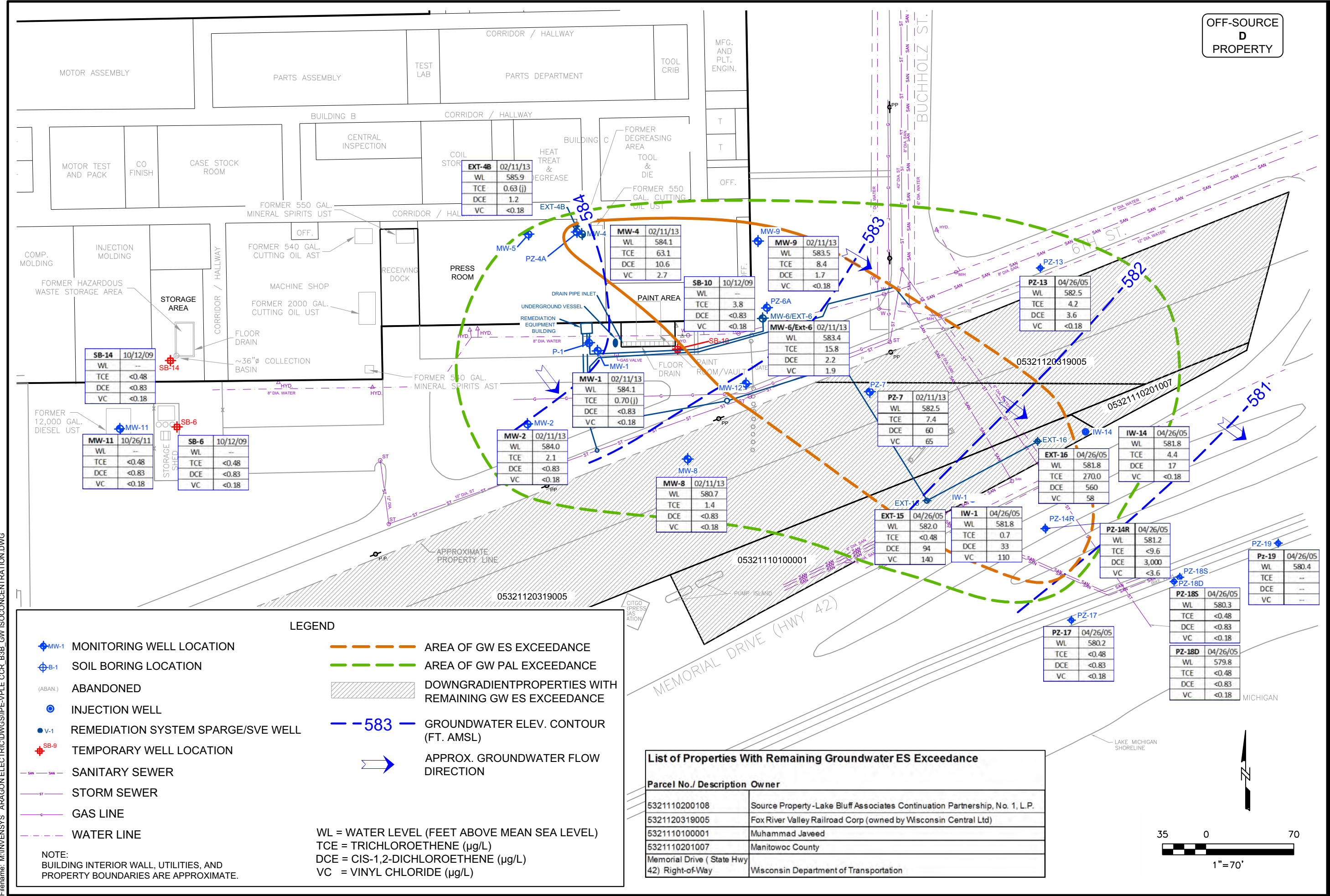
Please review this letter and the attachments, and if you require additional information, please feel free to contact the undersigned.

Very truly yours

Arnstein & Lehr LLP

/s/ William J. Anaya

William J. Anaya



OFF-SOURCE  
D  
PROPERTY

SB-14	10/12/09
WL	--
TCE	<0.48
DCE	<0.83
VC	<0.18

MW-11	10/26/11
WL	--
TCE	<0.48
DCE	<0.83
VC	<0.18

SB-6	10/12/09
WL	--
TCE	<0.48
DCE	<0.83
VC	<0.18

EXT-4B	02/11/13
WL	585.9
TCE	0.63 (j)
DCE	1.2
VC	<0.18

MW-4	02/11/13
WL	584.1
TCE	63.1
DCE	10.6
VC	2.7

MW-9	02/11/13
WL	583.5
TCE	8.4
DCE	1.7
VC	<0.18

SB-10	10/12/09
WL	--
TCE	3.8
DCE	<0.83
VC	<0.18

MW-6/EXT-6	02/11/13
WL	583.4
TCE	15.8
DCE	2.2
VC	1.9

PZ-13	04/26/05
WL	582.5
TCE	4.2
DCE	3.6
VC	<0.18

MW-2	02/11/13
WL	584.0
TCE	2.1
DCE	<0.83
VC	<0.18

MW-8	02/11/13
WL	580.7
TCE	1.4
DCE	<0.83
VC	<0.18

PZ-7	02/11/13
WL	582.5
TCE	7.4
DCE	60
VC	65

EXT-16	04/26/05
WL	581.8
TCE	270.0
DCE	560
VC	58

IW-14	04/26/05
WL	581.8
TCE	4.4
DCE	17
VC	<0.18

EXT-15	04/26/05
WL	582.0
TCE	<0.48
DCE	94
VC	140

IW-1	04/26/05
WL	581.8
TCE	0.7
DCE	33
VC	110

PZ-14R	04/26/05
WL	581.2
TCE	<9.6
DCE	3,000
VC	<3.6

PZ-19	04/26/05
WL	580.4
TCE	--
DCE	--
VC	--

PZ-18S	04/26/05
WL	580.3
TCE	<0.48
DCE	<0.83
VC	<0.18

PZ-17	04/26/05
WL	580.2
TCE	<0.48
DCE	<0.83
VC	<0.18

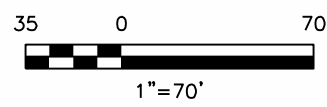
PZ-18D	04/26/05
WL	579.8
TCE	<0.48
DCE	<0.83
VC	<0.18

LEGEND

- MW-1 MONITORING WELL LOCATION
- B-1 SOIL BORING LOCATION
- (ABAN.) ABANDONED
- INJECTION WELL
- V-1 REMEDIATION SYSTEM SPARGE/SVE WELL
- SB-9 TEMPORARY WELL LOCATION
- SANITARY SEWER
- STORM SEWER
- GAS LINE
- WATER LINE
- AREA OF GW ES EXCEEDANCE
- AREA OF GW PAL EXCEEDANCE
- DOWNGRADIENT PROPERTIES WITH REMAINING GW ES EXCEEDANCE
- 583- GROUNDWATER ELEV. CONTOUR (FT. AMSL)
- APPROX. GROUNDWATER FLOW DIRECTION

WL = WATER LEVEL (FEET ABOVE MEAN SEA LEVEL)  
 TCE = TRICHLOROETHENE (µg/L)  
 DCE = CIS-1,2-DICHLOROETHENE (µg/L)  
 VC = VINYL CHLORIDE (µg/L)

List of Properties With Remaining Groundwater ES Exceedance		
Parcel No./ Description	Owner	
5321110200108	Source Property - Lake Bluff Associates Continuation Partnership, No. 1, L.P.	
5321120319005	Fox River Valley Railroad Corp (owned by Wisconsin Central Ltd)	
5321110100001	Muhammad Javeed	
5321110201007	Manitowoc County	
Memorial Drive ( State Hwy 42) Right-of-Way	Wisconsin Department of Transportation	



OFF-SOURCE  
D  
PROPERTY

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"><li>■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</li><li>■ Print your name and address on the reverse so that we can return the card to you.</li><li>■ Attach this card to the back of the mailpiece, or on the front if space permits.</li></ul>	A. Signature <input checked="" type="checkbox"/> <i>Margie Olejniczak</i> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee
1. Article Addressed to:	B. Received by ( <i>Printed Name</i> ) C. Date of Delivery <i>4/11/03</i>
Wisconsin Department of Transportation 944 Vanderperren Way Green Bay, Wisconsin 54304-5344 Attention: Mr. Will Dorsey, Director	D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No
2. Article Number <i>(Transfer from service label)</i>	3. Service Type <input type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.
7008 1140 0004 3547 8707	4. Restricted Delivery? ( <i>Extra Fee</i> ) <input type="checkbox"/> Yes

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

OFF-SOURCE  
D  
PROPERTY

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"><li>■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</li><li>■ Print your name and address on the reverse so that we can return the card to you.</li><li>■ Attach this card to the back of the mailpiece, or on the front if space permits.</li></ul>	<p>A. Signature <input checked="" type="checkbox"/> <i>Bill Boof</i> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) <input type="checkbox"/> C. Date of Delivery <i>4/8/03</i></p>
<p>1. Article Addressed to:</p> <p>Wisconsin Department of Transportation 944 Vanderperren Way Green Bay, Wisconsin 54304-5344 Attention: Mr. Will Dorsey, Director</p>	<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input checked="" type="checkbox"/> No</p> <p>3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p> <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>
<p>2. Article Number (Transfer from service label)</p>	<p>7008 1140 0004 3547 8783</p>
<p>PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540</p>	





OFF-SOURCE  
E  
PROPERTY

William J. Anaya  
312.876.7109  
[wjanaya@arnstein.com](mailto:wjanaya@arnstein.com)  
Direct Facsimile: 312.876.7309  
Licensed in Illinois and Indiana

March 28, 2013

**VIA CERTIFIED MAIL –  
RETURN RECEIPT REQUESTED**

Manitowoc County  
1010 South 8th Street  
Manitowoc, Wisconsin 54220

**Re: Notice of Application for Closure at Real Property commonly described as 606 Parkway Boulevard, Two Rivers, Wisconsin (the “Site”); Description of Groundwater Conditions at Parcel No. 053-211-102-010.07; WDNR BRRTS VPLE No. 06-36-551669, ERP No. 02-36-00153  
Our Client: Ranco Incorporated of Delaware**

Dear Sir or Madam:

This letter is to advise you per Wisconsin Environmental Law of possible residual groundwater impacts on County’s Right-of-Way property (Parcel No. 053-211-102-010.07) located south of the former Paragon Electric Facility (the “Site”) at 606 Parkway Boulevard, Two Rivers, Wisconsin (see attached Drawing for location). Ranco Incorporated of Delaware has completed all of the active remedial activities at the Site required by Wisconsin Environmental Law, and is in the process of confirming administrative closure of the Site with the Wisconsin Department of Natural Resources (“WDNR”) pursuant to the state’s voluntary cleanup program. Our client is applying for a Certificate of Completion pursuant to Wisconsin’s Voluntary Party Liability Exemption (“VPLE”) confirming that no further remediation activities are required at the Site.

For your information, our client’s environmental consultant has concluded that after nearly a decade of active groundwater remediation, the remediation activities are complete with certain residual material left in the groundwater at the Site in the form of trichloroethene (“TCE”) and its degradation by products. Those residual materials will remain at concentrations that currently exceed standards found in chapter NR 140, Wisconsin Administrative Code, and some of that material is migrating through the groundwater beneath the Site into the subsurface at the County’s Right-of-Way (drawing attached). Even so, our client’s consultant has concluded (consistent with WDNR closure requirements), that the residual material does pose a danger at the Site or to your property interests, and will eventually biodegrade over time. The purpose of

Manitowoc County  
March 28, 2013  
Page 2

this notice is to advise you of the presence of the material and to advise you of certain requirements imposed by Wisconsin environmental law.

Again, please be advised that our client's consultant has concluded that the current conditions associated with residual TCE in the groundwater do not pose any danger to human health or to the environment at your property. Indeed, the current conditions at the Site and at your property are compliant with Wisconsin environmental law. At such time as WDNR formally closes the Site pursuant to the terms of our client's currently pending application, no further investigation or cleanup will be performed, required or initiated beyond reliance on natural attenuation.

We are sending you this notice and the attachments pursuant to Wisconsin Administrative Code Chapter NR 726.05(2). For your information, WDNR will not review our client's closure request for at least 30 days following the date of this letter. If, as the owner of property adjacent to the Site, you have contradictory information, you may contact WDNR and provide the Agency with any technical information that contradicts our client's application for VLPE closure.

If you have any such information, you may submit it to WDNR by addressing it as follows:

Ms. Annette Weissbach  
Wisconsin Department of Natural Resources  
Northeast Region Headquarters  
2984 Shawano Avenue  
Green Bay, Wisconsin 54313-6727

For your information, after the Site is closed as described in this letter, the boundaries of the groundwater identified with residual contamination known to exceed the standards established at chapter NR 140 will be reported on WDNR's Geographic Information System (GIS) Registry of Closed Remediation Sites. The information reported on the GIS Registry includes maps identifying the location of various properties in Wisconsin with groundwater that contains material at concentrations that exceed the standards established at chapter NR 140. This GIS Registry is available to the general public, and reported publicly on WDNR's internet web site. We have attached a copy of a drawing identifying the location of properties that are known to have been impacted by the TCE described above. Our client also provided a copy of this drawing to WDNR, and WDNR may use it or the information described therein in preparing the information to be disclosed in the GIS referred to above.

At such time as WDNR approves our client's pending application for closure under the VPLE Program, WDNR will report closure in a letter to our client. Upon receipt, we will provide a copy of the letter to you, or you may obtain a copy from Ms. Annette Weissbach, WDNR, 2984 Shawano Avenue, Green Bay, Wisconsin 54313-



Manitowoc County  
March 28, 2013  
Page 3

6727, or by accessing the DNR GIS Registry of Closed Remediation Sites on the internet at <http://www.dnr.wi.gov/org/aw/rr/gis/index.htm>.

Finally, in the event that you, or any subsequent owner of your property, intends to construct or reconstruct a groundwater well at your property, please be advised that special well construction standards will be applicable to protect the well from the residual TCE remaining in the groundwater, at least until the concentrations naturally attenuate and biodegrade as described above. Every well driller who proposes to construct a well at your property will need to verify the groundwater conditions, and if the exceedances described in this letter remain, the well driller will be required to obtain approval from a regional water supply specialist with WDNR's Drinking Water and Groundwater Program. The well construction application, form 3300-254, is available at WDNR's web site at <http://www.dnr.wi.gov/org/water/dwg/3300254.pdf>, or may be accessed through the GIS Registry web address in the preceding paragraph.

Please review this letter and the attachments, and if you require additional information, please feel free to contact the undersigned.

Very truly yours

Arnstein & Lehr LLP

/s/ William J. Anaya

William J. Anaya



OFF-SOURCE  
E  
PROPERTY

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"><li>■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</li><li>■ Print your name and address on the reverse so that we can return the card to you.</li><li>■ Attach this card to the back of the mailpiece, or on the front if space permits.</li></ul>	A. Signature <input checked="" type="checkbox"/> Laurie Heier <input type="checkbox"/> Agent <input type="checkbox"/> Addressee
1. Article Addressed to:  <p>Manitowoc County 1010 South 8th Street Manitowoc, Wisconsin 54220</p>	B. Received by ( <i>Printed Name</i> ) LAURIE HEIER C. Date of Delivery 4-1-13 D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No
2. Article Number: (Transfer from service label)	3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.
PS Form 3811, February 2004	4. Restricted Delivery? ( <i>Extra Fee</i> ) <input type="checkbox"/> Yes  7008 1140 0004 3547 8714 Domestic Return Receipt 102595-02-M-1540



## ATTACHMENT G.1: DEEDS

Paragon Electric Site, Two Rivers, Wisconsin  
WDNR BRRTS No. 02-36-000153, AECOM Project No. 60236613

1. DEED FOR PARAGON ELECTRIC PROPERTY (**PARCEL NO. 053-211-102-001.8**) ATTACHED ALONG WITH TAX RECORD DETAIL)
2. DEED FOR **PARCEL NO. 05321110100001** OWNED BY MR. MUHAMMAD JAVEED AND MRS. TAHIRA JAVEED ATTACHED.
3. DEED FOR **PARCEL No. 05321110201007** OWNED BY MANITOWOC COUNTY ATTACHED.
4. WISCONSIN CENTRAL RAILROAD RIGHT-OF-WAY AND STATE HIGHWAY 42 RIGHT-OF-WAY DO NOT HAVE DEED DOCUMENTS.
5. NONE OF THE DEED DOCUMENTS REFER TO A CERTIFIED SURVEY MAP, THEREFORE MAPS NOT ATTACHED.

SOURCE  
PROPERTY

DOCUMENT NO.

744334

STATE BAR OF WISCONSIN FORM 1—1982  
SPECIAL WARRANTY DEED  
290

THIS SPACE RESERVED FOR RECORDING DATA

RECEIVED FOR RECORD  
VIN 1101 PAGE 290  
OCT 3 PM 3 10  
MARSHES COUNTY, WI  
PRESTON JONES  
RECORDING DEEDS

This Deed, made between Royal Terrace Partnership, L.P.,  
an Illinois limited partnership

Grantor,  
and Lake Bluff Associates Continuation Partnership No. 1, L.P.,  
an Illinois limited partnership

Grantee,  
Witnesseth, That the said Grantor, for a valuable consideration  
Ten and 00/100 Dollars (\$10.00)  
conveys to Grantee the following described real estate in Manitowoc  
County, State of Wisconsin:

and more particularly described in Exhibit A attached hereto and  
made a part hereof, subject to the matters shown on Exhibit B attached  
hereto and made a part hereof.

To have and to hold the premises aforesaid, with all and singular the rights, privileges, and appurtenances  
immunities, and improvements thereto belonging, or in anywise appertaining, unto Grantee, and unto its  
successors and assigns, forever.

And the Grantor, for itself, and its successors, does covenant, promise and agree, to and with the Grantee,  
its successors and assigns, that it has not done or suffered to be done, anything whereby the said  
premises hereby granted are, or may be, in any manner incumbered or charged except as herein recited;  
and that the said premises, against all persons lawfully claiming, or to claim the same, by, through or  
under it, will Warrant and Defend.

RETURN TO  
Chicago Title Co.  
171 North Clark St.  
Chicago, IL 60601-3294

Tax Parcel No: 53-202-403-000-2  
53-211-102-000-9  
53-308-003-019-2

Correct Tax Parcel No.  
053-211-102-001.08  
(See Attached Tax  
Record Detail)

TRANSFER  
\$50,100.00  
FEE

This ~~is~~ <sup>is not</sup> homestead property.  
(is) (is not)

Together with all and singular the hereditaments and appurtenances thereto belonging;  
And warrants that the title is good, indefeasible in fee simple and free and clear of encumbrances except

Dated this 25th day of September 19 94  
ROYAL TERRACE PARTNERSHIP, L.P., an Illinois  
limited partnership  
BY: M. AND B. INVESTMENT CORPORATION, its general partner  
By: Bertram L. Miner, President

AUTHENTICATION  
Signature(s)  
authenticated this day of 19  
TITLE: MEMBER STATE BAR OF WISCONSIN  
(If not authorized by § 706.06, Wis. Stats.)

THIS INSTRUMENT WAS DRAFTED BY  
David M. Alin, Rosenthal and Schanfield,  
55 E. Monroe Street, 46th Floor, Chicago, IL  
(Signatures may be authenticated or acknowledged. Both  
are not necessary.)

ACKNOWLEDGMENT  
STATE OF WISCONSIN ILLINOIS  
ss.  
Cook County.  
Personally came before me this 25th day of  
September 19 94 the above named  
Royal Terrace Partnership, L.P., an Illinois limited  
partnership, acting by and through its general  
partner, M and B Investment Corporation, by  
Bertram L. Miner, President  
to me known to be the person who executed the  
foregoing instrument and acknowledge the same.  
LINDA S. FOX  
Notary Public, State of Illinois  
My Commission Expires Aug. 23, 1997  
Notary Public  
My Commission is permanent. (If not, state expiration  
date: 19 )

SOURCE  
PROPERTY

**EXHIBIT A**

**Legal Description**

A parcel of land located partially in the South One-half (S1/2) of the Southeast Quarter (SE1/4) of Section Numbered Two (2), Township Numbered Nineteen (19) North, Range Numbered Twenty-four (24) East, partially in the Subdivision of Government Lot Numbered One (1) of Section Numbered Eleven (11), Township Numbered Nineteen (19) North, Range Numbered Twenty-four (24) East, and in Block Numbered Three (3) of Thiede and Goeler's Addition, in the City of Two Rivers, Manitowoc County, Wisconsin, described as follows:

Commencing at the S1/4 corner of said Section 2; thence N.05°23'40"E. along the 1/4 section line, 331.39 feet to its intersection with the South line of 7th Street extended West; thence N.89°14'10"E. along the extension of the South line of 7th Street, 70.41 feet to the intersection of the South line of 7th Street and the East line of Columbus Street, said point being the point of real beginning; thence continue N.89°14'10"E. along the South line of 7th Street, 1349.18 feet; thence S.86°00'50"E. along the South line of 7th Street, 343.20 feet to its intersection with the West line of Buchholz Street; thence S.00°38'30"W. along the West line of Buchholz Street, 302.05 feet to its intersection with the South section line of said Section 2; thence N.89°16'00"E. along said section line, 66.42 feet to its intersection with the Northerly line of the Fox River Valley Railroad; thence S.68°29'50"W. along the Northerly line of the Fox River Valley Railroad, 1914.13 feet to its intersection with the East line of Columbus Street; thence N.00°26'00"W. along the East line of Columbus Street, 674.83 feet; thence N.05°23'40"E. along the East line of Columbus Street, 335.33 feet to the point of real beginning.

26



EXHIBIT BPermitted Title Exceptions

- (a) General taxes for 1994 and subsequent years not yet due and payable; Tax Key Numbers 53-202-403-000-2; 53-211-102-000-9; and 53-308-003-019-2.
- (b) Rights of the public in that portion of the within described premises lying within the limits of public roads and public rights of way; namely in Sixth Street and Bucholz Street and as shown on Survey #T-14265 by Brey, Stuewe & Braun, Inc., dated February 10, 1993.
- (c) Easement to the City of Two Rivers, as recorded in the Office of the Register of Deeds for Manitowoc County, Wisconsin in Volume 194 of Deeds, page 348, #249195.
- (d) Terms and condition of Agreement and Easement to City of Two Rivers, as recorded in the Office of the Register of Deeds for Manitowoc County, Wisconsin in Volume 296 of Deeds, page 337, #365216.
- (e) Setback requirements as disclosed by Survey #T-14265, dated February 10, 1993, (as revised) by Kenneth C. Meneau, Registered Land Surveyor, by Brey, Stuewe & Braun, Inc. as follows:
- 1) Setback is 25 feet minimum.
  - 2) Side Yard is 10 feet minimum.
  - 3) Buildings shall not exceed 75 feet or 6 stores in height
- (f) Utilities as disclosed by Survey #T-14265, dated February 10, 1993, (as revised) by Kenneth C. Meneau, Registered Land Surveyor, by Brey, Stuewe & Braun, Inc. as follows:
- 1) Sanitary sewer lateral
  - 2) Overhead Electric Service
  - 3) Water service
  - 4) Gas service
- (g) Rights of Paragon Electric Company, Inc., as lessee, under a lease, memorandum of which was recorded in the Office of the Register of Deeds for Manitowoc County, Wisconsin in Volume 1019 of Records, page 752, #714546 on April 8, 1993, and all parties claiming thereunder.
- (h) 1992 REAL ESTATE TAXES  
#53-308-003-019-2  
Amount: \$135,328.45  
Paid: 90,218.97  
Balance: \$ 45,109.48 not now due.
- (i) Unrecorded rights of Intermatic, Incorporated contained in paragraph 11 of Stock Purchase and Stockholders

Agreement by and between PECO-Two Rivers Inc. and Intermatic, Incorporated dated March 19, 1986.

- (j) Financing Statement #448186  
Debtor: Mesirow Two Rivers Limited Partnership  
Secured Party: State Street Bank and Trust Company of Connecticut, National Association, as Security Trustee  
Filed April 8, 1993 at 3:55 P.M.
- (k) Financing Statement #448187  
Debtor: Paragon Electric Company, Inc.  
Secured Party: Mesirow Two Rivers Limited Partnership  
Filed April 8, 1993 at 3:56 P.M.
- (l) Indenture of Mortgage, Assignment of Lease and Security Agreement between Mesirow Two Rivers Limited Partnership and State Street Bank and Trust Company of Connecticut National Association, as Indenture Trustee, dated as of March 25, 1993 and recorded in the Office of the Register of Deeds for Manitowoc County, Wisconsin in Volume 1020 of Records, page 1, as Document No. 714547 on April 8, 1993 at 3:54 P.M.
- (m) Any documents related to the sale of the Property to Royal Terrace Partnership, L.P. that modify items (j), (k) and (l) above.
- (n) That certain lease agreement dated as of March 25, 1993 between Royal Terrace Partnership, L.P. (as successor in interest to Mesirow Two Rivers Limited Partnership, an Illinois limited partnership) as landlord, and Paragon Electric Co. Inc. as tenant (and a memorandum thereof).
- (o) Rights of persons claiming by, through or under Purchaser.
- (p) liens or encumbrances caused by the acts of Paragon, its agents, employees or contractors and rights of persons claiming by, through or under Paragon and all other liens and encumbrances which Paragon is required to remove pursuant to the terms of the lease; and any other matters which Purchaser shall approve in writing.

SOURCE  
PROPERTY

744336

ASSIGNMENT AND ASSUMPTION AGREEMENT

Dated as of September 30, 1994

RE:

Lease of Manufacturing Facility

To

PARAGON ELECTRIC COMPANY, INC.,

Among

MONUMENTAL LIFE INSURANCE COMPANY

And

THE OHIO NATIONAL LIFE INSURANCE COMPANY

RECEIVED FOR RECORD

1101 299

OCT 3 PM 3 11

CLERK OF COURT

CLERK OF COURT

CLERK OF COURT

NOTEHOLDERS

ROYAL TERRACE PARTNERSHIP, L.P.

TRANSFEROR

M AND B INVESTMENT CORPORATION

M AND B

LAKE BLUFF ASSOCIATES CONTINUATION PARTNERSHIP NO. 1, L.P.

LESSOR

L.B. PROPERTIES

GENERAL PARTNER

And

STATE STREET BANK AND TRUST COMPANY  
OF CONNECTICUT, NATIONAL ASSOCIATION

INDENTURE TRUSTEE

This instrument prepared by  
and upon recording should be returned to:

Daniel J. Favero, Esq.  
Chapman and Cutler  
111 West Monroe Street  
Chicago, Illinois 60603

124.00 CLK

278590.03.03  
1400423

SOURCE  
PROPERTY

DOCUMENT NO.	STATE BAR OF WISCONSIN FORM 1--1982 SPECIAL WARRANTY DEED	THIS SPACE RESERVED FOR RECORDING DATA
<p>This Deed, made between <u>Royal Terrace Partnership, L.P., an Illinois limited partnership</u></p> <p>Grantor, and <u>Lake Bluff Associates Continuation Partnership No. 1, L.P., an Illinois limited partnership</u></p> <p>Grantee,</p> <p>Witnesseth, that the said Grantor, for a valuable consideration, conveys to Grantee the following described real estate in <u>Northbrook</u> County, State of Wisconsin:</p> <p>and more particularly described in Exhibit A attached hereto and made a part hereof, subject to the matters shown on Exhibit B attached hereto and made a part hereof.</p> <p>To have and to hold the premises aforesaid, with all and singular the rights, privileges, and appurtenances, and improvements thereto belonging, or in anywise appertaining, unto Grantee, and unto its successors and assigns. Forever.</p> <p>And the Grantor, for itself, and its successors, does covenant, promise and agree, to and with the Grantee, its successors and assigns, that it has not done or suffered to be done, anything whereby the said premises hereby granted are, or may be, in any manner incumbered or charged except as herein recited; and that the said premises, against all persons lawfully claiming, or to claim the same, by, through or under it, will warrant and defend.</p>		
<p>This <input checked="" type="checkbox"/> (is) <input type="checkbox"/> (is not) homestead property.</p> <p>Together with all and singular the hereditaments and appurtenances thereto belonging; and warrants that the title is good, indefeasible, free and clear of encumbrances except</p>		<p>TAX PARCEL NO: 53-202-403-000-2 53-211-102-000-9 53-308-007-012-2</p>
<p>Dated this <u>25th</u> day of <u>September</u>, 19<u>94</u></p> <p>BY: <u>ROYAL TERRACE PARTNERSHIP, L.P., an Illinois limited partnership</u> (SEAL)  <u>M AND B INVESTMENT CORPORATION, its general partner</u> (SEAL)          By: <u>Bertram L. Miner, President</u></p>		
<p><b>AUTHENTICATION</b></p> <p>Signature(s) _____</p> <p>authenticated this _____ day of _____, 19____</p> <p>TITLE: <u>MEMBER STATE BAR OF WISCONSIN</u>          (If not authorized by § 706.06, Wis. Stats.)</p> <p>THIS INSTRUMENT WAS DRAFTED BY  <u>David M. Ailin, Rosenthal and Schanfield,</u>  <u>55 E. Monroe Street, 46th Floor, Chicago, IL</u>          (Signatures may be authenticated or acknowledged. Both are not necessary.)</p>	<p><b>ACKNOWLEDGMENT</b></p> <p>STATE OF WISCONSIN }          Cook } County, }          Personally came before me this <u>25th</u> day of <u>September</u>, 19<u>94</u>, the above named <u>Royal Terrace Partnership, L.P., an Illinois limited partnership, acting by and through its general partner, M and B Investment Corporation, by Bertram L. Miner, President</u></p> <p>to me known to be the person who executed the foregoing instrument and acknowledged the same as his own free and voluntary act.</p> <p><u>AINDA SLOK</u>          Notary Public, State of Illinois          My Commission Expires <u>2000</u> on <u>July 11</u>          My Commission is <u>RENEWED</u> (If not, state expiration date: _____, 19____)</p>	

EXHIBIT B 345

EXHIBIT A

Legal Description

A parcel of land located partially in the South One-half (S1/2) of the Southeast Quarter (SE1/4) of Section Numbered Two (2), Township Numbered Nineteen (19) North, Range Numbered Twenty-four (24) East, partially in the Subdivision of Government Lot Numbered One (1) of Section Numbered Eleven (11), Township Numbered Nineteen (19) North, Range Numbered Twenty-four (24) East, and in Block Numbered Three (3) of Thiede and Goeler's Addition, in the City of Two Rivers, Manitowoc County, Wisconsin, described as follows:

Commencing at the S1/4 corner of said Section 2; thence N.05°23'40"E. along the 1/4 section line, 331.39 feet to its intersection with the South line of 7th Street extended West; thence N.89°14'10"E. along the extension of the South line of 7th Street, 70.41 feet to the intersection of the South line of 7th Street and the East line of Columbus Street, said point being the point of real beginning; thence continue N.89°14'10"E. along the South line of 7th Street, 1349.18 feet; thence S.86°00'50"E. along the South line of 7th Street, 343.20 feet to its intersection with the West line of Buchholz Street; thence S.00°38'30"W. along the West line of Buchholz Street, 302.05 feet to its intersection with the South section line of said Section 2; thence N.89°16'00"E. along said section line, 66.42 feet to its intersection with the Northerly line of the Fox River Valley Railroad; thence S.68°29'50"W. along the Northerly line of the Fox River Valley Railroad, 1914.13 feet to its intersection with the East line of Columbus Street; thence N.00°26'00"W. along the East line of Columbus Street, 674.83 feet; thence N.05°23'40"E. along the East line of Columbus Street, 335.33 feet to the point of real beginning.

864299

UTILITY EASEMENT

SOURCE  
PROPERTY



VOL 1456 PAGE 257

RECEIPT# 7609  
\$12.00 DEED-CHARGE

STATE OF WISCONSIN  
MANITOWOC COUNTY  
PRESTON JONES  
REGISTER OF DEEDS  
RECEIVED FOR RECORD  
4 OCT 2000 9:20:24 AM

RETURN & CHARGE TO:  
T.R. WATER & LIGHT  
1415 LAKE ST.  
TWO RIVERS WI 54241

\$12 CHG

**DO NOT REMOVE**  
This page is part of  
this legal document

SOURCE  
PROPERTY

UTILITY EASEMENT



FOR VALUABLE CONSIDERATION, (Lake Bluff Associates Continuation Partnership No.1, L.P., an Illinois Limited Partnership), hereinafter referred to as "Grantor", hereby grants and conveys unto the City of Two Rivers, hereinafter referred to as "Grantee", a Wisconsin municipal corporation, Manitowoc County, Wisconsin, as well as their lessees, successors and assigns, a perpetual easement for the purpose of constructing, maintaining, repairing and replacing utility facilities over, on and under the following described real estate:

The West most 3 feet measured at right angles to the East ROW line of Columbus St. starting at the South West Corner of the parcel going North for 325 feet for the parcel recorded as follows:

Parcel Number 211-102-001-8  
NW1/4, NE1/4, and the NE1/4, NE1/2 of Sect.11, Township 19N, Range 24E, Part of Subdivision GL 1 lying North of C&NW Railroad ROW, also SW1/4, SE1/4 of Sect. 2, Township 19N, Range 24E, Tracts recorded in Vol. 256, Page 261 & Vol. 499, Page 327 of Deeds, also Thiede & Goeler Addition, all of Block 3 and Vacated Street described in Vol. 249, Page 197 of Deeds.

The trimming and removal of trees, bushes, shrubs or other foliage as may be necessary, in the judgment of Grantee, for the safe location of utility facilities shall be included in the rights granted hereunder by the Grantor and the Grantor hereby consents to such trimming or removal.

The Grantor warrants that the Grantor possesses sufficient title to the above described property to convey this easement free and clear of any encumbrances.

The easement granted herein shall run with the land, and shall be binding upon and inure to the benefit of the parties hereto, as well as their successors and assigns.

Dated this 25 day of (AUGUST, 2000)

A General Partner Representative of Lake Bluff Associates Continuation Partnership No.1, L.P., an Illinois Limited Partnership

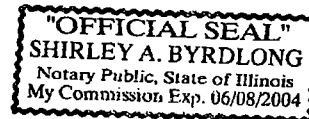
STATE - OF - ILLINOIS )  
)SS  
COUNTY- OF- COOK )

Personally came before me this 25 of (AUGUST, 2000), the above named, as a General Partner Representative of (Lake Bluff Associates Continuation Partnership No.1, L.P., an Illinois Limited Partnership), to me known to be the persons who executed the foregoing instrument and acknowledged the same.

Notary Public, State of ILLINOIS  
My commission expires: 6/8/2004

This instrument drafted by:  
City Attorney John M. Bruce

Return to:  
Two Rivers Water & Light Department  
1415 Lake St.  
Two Rivers, WI 54241-0087



SOURCE  
PROPERTY

# Manitowoc County, Wisconsin

## Tax Record Detail

**Print Report** 

(Click 'back' on your browser to return to your listing.)  
Updated 2/17/2013

**Tax Detail For Parcel Number 053-211-102-001.08**

 **Click Here To Access The City Of Two Rivers Assessors Site**

**Location Information**

**Assessment Information**

Note: Fair Market Value is not shown for Agricultural Land because of Use Value Assessment per State law.

Parcel Number 053-211-102-001.08  
Municipality CITY OF TWO RIVERS  
Owner(s) Name PARTNE LAKE BLUFF ASSOC CONTIN  
INVENSYS INC  
Location Address 606 PARKWAY BLVD  
Mailing Address 33 COMMERCIAL STREET MS  
  
City, State, Zip FOXBORO MA 20350-0000

	<u>2010</u>	<u>2011</u>
Assessed Acres	0.000	0.000
Land Value	\$25,850.00	\$25,850.00
Improvement Value	\$4,017,200.00	\$4,017,200.00
Total Value	\$4,043,050.00	\$4,043,050.00
Fair Market Value	\$4,497,700.00	\$4,401,500.00
Fair Market Ratio	0.8989	0.9185

**Property Description**

**Tax Information**

(As of last tax bill issued)

Legal Description NW 1/4 NE 1/4 & NE 1/4 NE 1/2 OF S11 T19N R24E PT OF SUB GOVT LOT 1 LYING N OF C & N W RR ROW ALSO SW 1/4 SE 1/4 S2 T19N R24E TRACTS REC IN V 256 P 261 & V 499 P 327 OF DEEDS ALSO THIEDE & GOELE D ALL OF BLK 3 & VAC STREET IN V 249 P 197 OF DEEDS

	<u>2010</u>	<u>2011</u>
Original Tax	\$112,726.19	\$112,752.52
Lottery Credit	\$0.00	\$0.00
Net Tax	\$112,726.19	\$112,752.52
Special Assessments	\$4,241.34	\$0.00
Total Amount Due	\$116,967.53	\$112,752.52
Total Payments	\$116,967.53	\$112,752.52
<b>Balance Due...</b>	<b>\$0.00</b>	<b>\$0.00</b>

\*Green = postponed

\*Red = delinquent (subject to interest).

Please refer to the 'TAXES DUE' table below for payoff amounts.

Section, Town, Range S.0, T.0, R.0  
Total Acres 0.000  
Volume  
Page  
Document Number

**Taxing District Information**

School District TWO RIVERS SCHOOL  
Vocational School District LTC

TAX PAYMENTS				
Tax Year	Payment Date	Payment Amount	Interest	Receipt Number
2011	12/27/2011	\$112,752.52	\$0.00	682180
2010	1/21/2011	\$112,726.19	\$0.00	19526
2010	1/21/2011	\$4,241.34	\$0.00	19526



## ATTACHMENT G.1: DEEDS

Paragon Electric Site, Two Rivers, Wisconsin  
WDNR BRRTS No. 02-36-000153, AECOM Project No. 60236613

1. DEED FOR PARAGON ELECTRIC PROPERTY (**PARCEL NO. 053-211-102-001.8**) ATTACHED ALONG WITH TAX RECORD DETAIL)
2. DEED FOR **PARCEL NO. 05321110100001** OWNED BY MR. MUHAMMAD JAVEED AND MRS. TAHIRA JAVEED ATTACHED.
3. DEED FOR **PARCEL No. 05321110201007** OWNED BY MANITOWOC COUNTY ATTACHED.
4. **WISCONSIN CENTRAL RAILROAD RIGHT-OF-WAY AND STATE HIGHWAY 42 RIGHT-OF-WAY DO NOT HAVE DEED DOCUMENTS.**
5. NONE OF THE DEED DOCUMENTS REFER TO A CERTIFIED SURVEY MAP, THEREFORE MAPS NOT ATTACHED.

979074



OFF-SOURCE  
C  
PROPERTY

STATE BAR OF WISCONSIN FORM 1 - 2000  
WARRANTY DEED

Document Number

This Deed, made between Mohammed Aziz Ahmed and Hamida H. Ahmed, husband and wife

Grantor, and Muhammad Javeed and Tahira Javeed, husband and wife, as survivorship marital property

Grantee.

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

That part of Lot Numbered Two (2) of the Subdivision of Government Lot Numbered One (1) of Section Numbered Eleven (11), Township Numbered Nineteen (19) North, Range Numbered Twenty-four (24) East, in the City of Two Rivers, Manitowoc County, Wisconsin, included with the following boundaries, to-wit:

Commence at a point where the line between said Lot 2 and Lot 1, in said Subdivision, intersects the Easterly line of the right-of-way of the Chicago & Northwestern Railway Company; thence Southwesterly along the Easterly line of said railroad company, 205 feet; thence Southeasterly on a line which will be at right angles with the Easterly line of State Trunk Highway 17; thence Northeasterly along the Westerly boundary line of said State Trunk Highway to the point where it intersects the said line between Lot 1 and Lot 2 in said Subdivision; thence Northwesterly along said line between Lot 1 and Lot 2 in said Subdivision back to the place of beginning.

Recording Area 11 + 210 CR  
Name and Return Address  
**Muhammad and Tahira Javeed**  
**3308 Chasm Lane**  
**Manitowoc, WI 54220**

53-211-101-000-1  
Parcel Identification Number (PIN)  
This is not homestead property.  
(s) (is not)

W-7

TRANSFER  
\$ 210.00  
FEE

SUBJECT TO Deed Restriction recorded in the office of the Register of Deeds for Manitowoc County, Wisconsin in Volume 1658 of Records, page 124, as document number 907022, and rerecorded in Volume 1661 of Records, page 246, as document number 907719.

Together with all appurtenant rights, title and interests.

Grantor warrants that the title to the Property is good, indefeasible in fee simple and free and clear of encumbrances except all easements, restrictions and covenants of record.

Dated this 20th day of November, 2004.

Mohammed Aziz Ahmed  
\* Mohammed Aziz Ahmed  
Hamida H. Ahmed  
\* Hamida H. Ahmed

AUTHENTICATION

Signature(s) \_\_\_\_\_

authenticated this \_\_\_\_\_ day of \_\_\_\_\_,

ACKNOWLEDGMENT

STATE OF WISCONSIN )  
) ss.  
Manitowoc County )

Personally came before me this 20th day of November, 2004 the above named Mohammed Aziz Ahmed and Hamida H. Ahmed

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

THIS INSTRUMENT WAS DRAFTED BY  
SALUTZ & SALUTZ LLP

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

Joseph W. Dabitzky  
\* Joseph W. Dabitzky  
Notary Public, State of WISCONSIN  
My Commission is permanent. (If not, state expiration date:  
June 26, 2005)

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

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

## ATTACHMENT G.1: DEEDS

Paragon Electric Site, Two Rivers, Wisconsin  
WDNR BRRTS No. 02-36-000153, AECOM Project No. 60236613

1. DEED FOR PARAGON ELECTRIC PROPERTY (**PARCEL NO. 053-211-102-001.8**) ATTACHED ALONG WITH TAX RECORD DETAIL)
2. DEED FOR **PARCEL NO. 05321110100001** OWNED BY MR. MUHAMMAD JAVEED AND MRS. TAHIRA JAVEED ATTACHED.
3. DEED FOR **PARCEL No. 05321110201007** OWNED BY MANITOWOC COUNTY ATTACHED.
4. **WISCONSIN CENTRAL RAILROAD RIGHT-OF-WAY AND STATE HIGHWAY 42 RIGHT-OF-WAY DO NOT HAVE DEED DOCUMENTS.**
5. NONE OF THE DEED DOCUMENTS REFER TO A CERTIFIED SURVEY MAP, THEREFORE MAPS NOT ATTACHED.

This Indenture, Made this 29<sup>th</sup> day of May, A. D. 19 64

between Lake Park Oil, Inc.,

a Corporation duly organized and existing under and by virtue of the laws of the State of Wisconsin, located at Manitowoc

Wisconsin, party of the first part, and Power Oil Corporation,  
a Corporation duly organized and existing under and by  
virtue of the laws of the State of Wisconsin, located at Milwaukee, Wisconsin, party of the second part,

Witnesseth, That the said party of the first part, for and in consideration of the sum of One Dollar (\$1.00) and other valuable considerations to it paid by the said party of the second part, the receipt whereof is hereby confessed and acknowledged, has given, granted, bargained, sold, remised, released, aliened, conveyed and confirmed, and by these presents does give, grant, bargain, sell, remise, release, alien, convey and confirm unto the said party of the second part, its successors and assigns forever, the following described real estate, situated in the County of Manitowoc and State of Wisconsin, to-wit:

That part of Lot Numbered Two (2) of the subdivision of Government Lot Numbered One (1) of Section Numbered Eleven (11), Township Numbered Nineteen (19) North, Range Numbered Twenty-four (24) East, included within the following boundaries, to-wit:

Commence at a point where the line between said Lot 2 and Lot 1, in said Subdivision, intersects the Easterly line of the right of way of the Chicago & Northwestern Railway Company; thence Southwesterly along the Easterly line of said right of way of said railroad company 205 feet; thence Southeasterly on a line which will be at right angles with the Easterly line of State Trunk Highway 17; thence Northeasterly along the westerly boundary line of said State Trunk Highway to the point whereit intersects the said line between Lot 1 and Lot 2 in said subdivision; thence Northwesterly along said line between Lot 1 and Lot 2 in said subdivision back to the place of beginning.

The party of the second part assumes and agrees to pay the 1964 real estate taxes in full.

Together with all and singular the hereditaments and appurtenances thereunto belonging or in any wise appertaining; and all the estate, right, title, interest, claim or demand whatsoever, of the said party of the first part, either in law or equity, either in possession or expectancy of, in and to the above bargained premises, and their hereditaments and appurtenances.

To Have and to Hold the said premises as above described with the hereditaments and appurtenances, unto the said party of the second part, and to its successors and assigns FOREVER.

And the said Lake Park Oil, Inc. party of the first part, for itself and its successors, does covenant, grant, bargain and agree to and with the said party of the second part, its successors and assigns, that at the time of the enrolling and delivery of these presents it is well seized of the premises above described, as of a good, sure, perfect, absolute and indefeasible estate of inheritance in the law, in fee simple, and that the same are free and clear from all incumbrances whatever.

and that the above bargained premises in the quiet and peaceable possession of the said party of the second part, its successors and assigns, against all and every person or persons lawfully claiming the whole or any part thereof, it will forever WARRANT AND DEFEND.

48816  
M&R

In Witness Whereof, the said Lake Park Oil, Inc.,  
 party of the first part, has caused these presents to be signed by Henry W. Meissner,  
 its President, and countersigned by William H. Meissner, its Secretary  
 at Manitowoc Wisconsin, and its corporate seal to be hereunto affixed, this 29<sup>th</sup>  
 day of May A. D. 19 64.

SIGNED AND SEALED IN PRESENCE OF

Austin F. Smith  
 Austin F. Smith  
Leona Hoffman  
 Leona Hoffman

Henry W. Meissner  
 Henry W. Meissner  
William H. Meissner  
 William H. Meissner



State of Wisconsin,  
Manitowoc County } ss

Personally came before me this 29<sup>th</sup> day of May, A. D. 19 64  
Henry W. Meissner President and William H. Meissner  
 Secretary of the above named Corporation, to me known to be the persons who executed the foregoing

instrument, and to me known to be such President and Secretary of said Corporation, and  
 acknowledged that they executed the foregoing instrument as such officers as the deed of said Corporation, by its authority.

Austin F. Smith  
 Austin F. Smith  
 Notary Public, Manitowoc County, Wis.  
 My commission is permanent.

NOTE—The names of the parties to this instrument and of the witnesses and notary must be printed or typewritten therein to enable it to be recorded.  
 Section 59.11 (1) (11) Wisconsin Statutes.

This instrument was drafted by  
 Attorney Austin F. Smith.

408016

TO

Premises

**Warren Dard**  
 This instrument should be immediately released upon receipt in a warehouse receipt and litigation.

REGISTRAR'S OFFICE  
 State of Wisconsin,  
Manitowoc County

Recorded/Registered Apr 9 - 28 day of May, A. D. 19 64  
 at MANITOWOC COUNTY and recorded in  
 Vol. 135 of DEEDS, on page 10

Return to  
Chas. G. G. G.  
 Dept.

*Conf. to 135-K-10-10  
 return to Milwaukee of this*

STATE OF OKLAHOMA, )  
                          ) SS.  
COUNTY OF TULSA.

Personally appeared before me this 20th day of February, A. D., 1935, the above-named H. N. GREIS, Ancillary Receiver for Wisconsin of Deep Rock Oil Corporation, to me personally known to be the person who executed the foregoing instrument, and acknowledged that he executed the same as such Ancillary Receiver, and as his own free act and deed, for the uses and purposes therein stated.

(Notary Seal)

May Scheig

Notary Public, Tulsa County, Oklahoma.  
My commission expires July 5, 1935

STATE OF ILLINOIS, )  
                          ) SS.  
COUNTY OF COOK.

Personally appeared before me this 27th day of February, A. D. 1935, the above-named BERNARD L. MAJEWSKI, Ancillary Receiver for Wisconsin of Deep Rock Oil Corporation, to me personally known to be the person who executed the foregoing instrument, and acknowledged that he executed the same as such Ancillary Receiver, and as his own free act and deed, for the uses and purposes therein stated.

(Notary Seal)

Yvonne Page

Received for record the 7th day of  
March A. D. 1935 at 2:10 P. M.

Notary Public, Cook County, Illinois  
My Commission expires March 7, 1935

Jos. M. Zahorik, Register of Deeds.

221750

R E C E I V E R S ' D E E D

THIS INDENTURE, Made and entered into by and between H. N. GREIS and BERNARD L. MAJEWSKI, as Ancillary Receivers for Wisconsin of Deep Rock Oil Corporation, a Delaware corporation, duly authorized to do business in the State of Wisconsin, parties of the first part, and H. N. GREIS, as Trustee in Bankruptcy of said DEEP ROCK OIL CORPORATION, party of the second part,

W I T N E S S E T H :

That, WHEREAS, the above-named H. N. GREIS and BERNARD L. MAJEWSKI were duly appointed Ancillary Receivers for the State of Wisconsin of Deep Rock Oil Corporation, by the Circuit Court of Milwaukee County, State of Wisconsin, on the 7th day of March, 1933, in an action therein pending, entitled John L. Gray and L. B. Riddle, plaintiffs, vs. Deep Rock Oil Corporation, defendant; and

WHEREAS, on the 16th day of March, 1933, said H. N. GREIS and BERNARD L. MAJEWSKI duly qualified in all things as such Ancillary Receivers, have been ever since said 16th day of March, 1933, and still are, the duly appointed and qualified Ancillary Receivers for Wisconsin of said Deep Rock Oil Corporation; and

WHEREAS, the above-named Deep Rock Oil Corporation, at the time of the appointment of said parties of the first part/<sup>as</sup> Ancillary Receivers herein, was seized and possessed of that certain real estate situated in the City of TWO RIVERS, County of MANITOWOC, and State of Wisconsin, hereinafter more particularly described; and

WHEREAS, on the 15th day of November, 1934, a quit-claim deed was executed by said Deep Rock Oil Corporation to said parties of the first part; as Ancillary Receivers for the State of Wisconsin, of the real estate hereinafter described; and

WHEREAS, on the 19th day of June, 1934, in the District Court of the United States for the Northern District of Oklahoma, in an action entitled "In the Matter of Deep Rock Oil Corporation, a corporation, debtor," H. N. GREIS, said party of the second part, was appointed Trustee of the Estate of said Deep Rock Oil Corporation, under Section 77b of the

*See appointment of Receivers and Trustees in Vol. 174 of Books on pages 495, 497, 505, and 508.*

Bankruptcy Act, to act as such until the further order of the Court; and upon the filing and approval of a bond in the sum of fifty thousand dollars (\$50,000.00); to have all the title to the property of said Deep Rock Oil Corporation; and

WHEREAS, on the 9th day of July, 1934, in the District Court of the United States for the Northern District of Oklahoma, an order was entered making permanent the appointment of said party of the second part as such Trustee; and

WHEREAS, in said proceedings in the Circuit Court of Milwaukee County, Wisconsin, an order was duly made and entered on the 27th day of December, 1934, authorizing and directing said parties of the first part, as such Ancillary Receivers, to convey the real estate hereinafter described, and other property, to said party of the second part:

NOW, THEREFORE, said parties of the first part, for and in consideration of the sum of One Dollar and other good and valuable consideration to them in hand paid by said party of the second part, receipt whereof is hereby confessed and acknowledged; have conveyed, remised and quitclaimed, and do hereby convey, remise and quitclaim unto the said party of the second part, and to his successors and assigns forever, all their right, title and interest as Ancillary Receivers for Wisconsin of said Deep Rock Oil Corporation, in and to the following described real estate situated in the County of MANITOWOC, State of Wisconsin, to-wit:

That part of Lot One (1), of the Subdivision of Government Lot One (1), Section Eleven (11), Township Nineteen (19) North of Range Twenty-four (24) East, lying between the highway leading from Two Rivers to Manitowoc, and formerly known as the Two Rivers and Manitowoc Plank Road and the right-of-way of the Chicago & Northwestern Railway Company, in the City of TWO RIVERS, Manitowoc County, Wisconsin.

TO HAVE AND TO HOLD unto the said party of the second part, his successors and assigns, FOREVER.

IN WITNESS WHEREOF, H. N. GREIS, as Ancillary Receiver for Wisconsin only, one of the parties of the first part, has hereunto set his hand and seal, at the City of Tulsa, County of Tulsa, and State of Oklahoma, and BERNARD L. MAJEWSKI, as Ancillary Receiver for Wisconsin only, one of the parties of the first part, has hereunto set his hand and seal, at the City of Chicago, County of Cook, and State of Illinois, this 20th day of February, A. D. 1935.

Signed, Sealed and Delivered  
In Presence of:

Edgar A. de Meules  
W. R. Francisco  
  
E. Turnquist  
H. Coffey

H. N. Greis (SEAL)  
As ancillary Receiver for Wisconsin of Deep Rock Oil Corporation.  
  
Bernard L. Majewski  
As Ancillary Receiver for Wisconsin of Deep Rock Oil Corporation  
(Corporate Seal)

STATE OF OKLAHOMA, )  
                                  )SS.  
COUNTY OF TULSA.

Personally appeared before me this 20th day of February, A. D. 1935, the above-named H. N. GREIS, Ancillary Receiver for Wisconsin of Deep Rock Oil Corporation, to me personally known to be the person who executed the foregoing instrument, and acknowledged that he executed the same as such Ancillary Receiver, and as his own free act and deed, for the uses and purposes therein stated.

(Notary Seal)

- May Scheig  
Notary Public, Tulsa County, Oklahoma.  
My commission expires July 5, 1935.

STATE OF ILLINOIS, )  
                                  )SS.  
COUNTY OF COOK.

Personally appeared before me this 27th day of February, A. D. 1935, the above-named

BERNARD L. MAJEWSKI, Ancillary Receiver for Wisconsin of Deep Rock Oil Corporation, to me personally known to be the person who executed the foregoing instrument, and acknowledged that he executed the same as such Ancillary Receiver, and as his own free act and deed, for the uses and purposes therein stated.

(Notary Seal)

Yvonne Page

Received for record the 7th day of March A. D. 1935 at 2:15 P. M.

Notary Public, Cook County, Illinois.  
My commission March 7, 1935

Jos. M. Zahorik, Register of Deeds.

221703A

QUIT CLAIM DEED

THIS INDENTURE, made this 9th day of January, A. D. 1935, between HARRY D. SAMMONS, a single man, of the city of Manitowoc, Manitowoc County, Wisconsin, party of the first part, and MANITOWOC PORTLAND CEMENT COMPANY, a Wisconsin corporation having its principal office at the city of Manitowoc, Manitowoc County, Wisconsin, party of the second part, WITNESSETH:

That the said party of the first part, for and in consideration of the sum of One Dollar (\$1.00) and other valuable considerations, to him in hand paid by the said party of the second part, the receipt whereof is hereby confessed and acknowledged, has given, granted, bargained, sold, remised, released and quit-claimed, and by these presents does give, grant, bargain, sell, remise, release and quit-claim unto the said party of the second part, and to its successors and assigns forever, the following described real estate, situated in the county of Manitowoc, state of Wisconsin, to-wit:

Government Lot Seven (7), Section Twenty-four (24), Township Nineteen (19) North, Range Twenty-three (23) East of the Fourth Principal Meridian, including a so-called island lying in the Manitowoc River adjacent to the said Government Lot Seven (7) and forming a part thereof.

TO HAVE AND TO HOLD the same, together with all and singular the appurtenances and privileges thereunto belonging or in anywise thereunto appertaining, and all the estate, right, title, interest and claim whatsoever of the said party of the first part, either in law or equity, either in possession or expectancy of, to the only proper use, benefit of the said party of the second part, its successors and assigns forever.

IN WITNESS WHEREOF, the said party of the first part has hereunto set his hand and seal this 9th day of January, A. D. 1935.

In presence of:

H. D. Sammons (SEAL)

M. E. Torrison

A. F. Rankin

State of Wisconsin, )  
( SS.  
Manitowoc County, )

Personally came before me, this 9th day of January, A. D. 1935; the above named Harry D. Sammons, to me known to be the person who executed the foregoing instrument, and acknowledged the same.

(Notary Seal)

Archie F. Rankin

Received for record the 6th day of March A. D. 1935 at 10:20 A..M.

Notary Public, Manitowoc County, Wisconsin.  
My commission expires May 31, 1936.

Jos. M. Zahorik, Register of Deeds.

(SEE MAP ON PAGE 504)



**ATTACHMENT G.1: DEEDS**

Paragon Electric Site, Two Rivers, Wisconsin  
WDNR BRRTS No. 02-36-000153, AECOM Project No. 60236613

1. DEED FOR PARAGON ELECTRIC PROPERTY (**PARCEL NO. 053-211-102-001.8**) ATTACHED ALONG WITH TAX RECORD DETAIL)
2. DEED FOR **PARCEL NO. 05321110100001** OWNED BY MR. MUHAMMAD JAVEED AND MRS. TAHIRA JAVEED ATTACHED.
3. DEED FOR **PARCEL No. 05321110201007** OWNED BY MANITOWOC COUNTY ATTACHED.
4. WISCONSIN CENTRAL RAILROAD RIGHT-OF-WAY AND STATE HIGHWAY 42 RIGHT-OF-WAY DO NOT HAVE DEED DOCUMENTS.
5. **NONE OF THE DEED DOCUMENTS REFER TO A CERTIFIED SURVEY MAP, THEREFORE MAPS NOT ATTACHED.**

## ATTACHMENT G.1: DEEDS

Paragon Electric Site, Two Rivers, Wisconsin  
WDNR BRRTS No. 02-36-000153, AECOM Project No. 60236613

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3. DEED FOR **PARCEL No. 05321110201007** OWNED BY MANITOWOC COUNTY ATTACHED.
4. WISCONSIN CENTRAL RAILROAD RIGHT-OF-WAY AND STATE HIGHWAY 42 RIGHT-OF-WAY DO NOT HAVE DEED DOCUMENTS.
5. **NONE OF THE DEED DOCUMENTS REFER TO A CERTIFIED SURVEY MAP, THEREFORE MAPS NOT ATTACHED.**

## ATTACHMENT G.1: DEEDS

Paragon Electric Site, Two Rivers, Wisconsin  
WDNR BRRTS No. 02-36-000153, AECOM Project No. 60236613

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4. WISCONSIN CENTRAL RAILROAD RIGHT-OF-WAY AND STATE HIGHWAY 42 RIGHT-OF-WAY DO NOT HAVE DEED DOCUMENTS.
5. **NONE OF THE DEED DOCUMENTS REFER TO A CERTIFIED SURVEY MAP, THEREFORE MAPS NOT ATTACHED.**

## **ATTACHMENT G.3: VERIFICATION OF ZONING**

Paragon Electric Site, Two Rivers, Wisconsin

WDNR BRRTS No. 02-36-000153, AECOM Project No. 60236613

SEE ATTACHED EMAIL FROM THE CITY OF TWO RIVERS AND THE CITY OF TWO RIVERS  
DISTRICT ZONING MAP

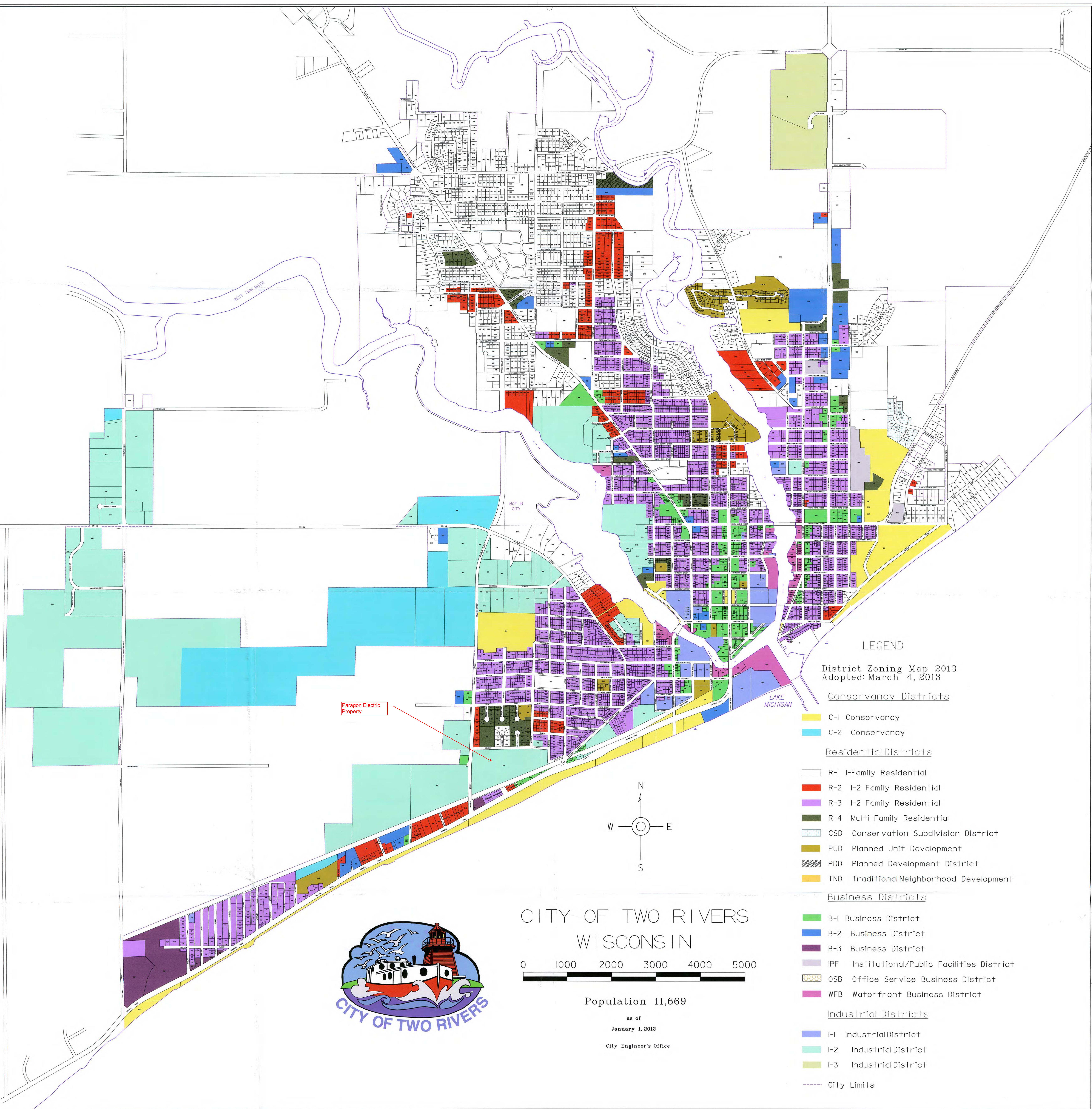
**From:** Vicky BERG [mailto:[vicber@two-rivers.org](mailto:vicber@two-rivers.org)]  
**Sent:** Monday, March 18, 2013 11:15 AM  
**To:** Durkin, Laura G.  
**Subject:** Re: Zoning Map [IWOV-ACTIVE.FID1059378]

Ms. Durkin-

The current zoning for the property known as 606 Parkway Blvd, Two Rivers is I-2 Industrial District.

The City's Zoning Ordinance may be reviewed on the City's website at [www.two-rivers.org](http://www.two-rivers.org). Click on Departments, Click on City Manager, Click on Municipal Code...the Zoning Code is Chapter 10.

Vicky Berg  
Zoning Administrator  
City of Two Rivers  
1717 East Park Street  
PO Box 87  
Two Rivers, WI 54241  
Phone: 920-793-5566  
Fax: 920-793-7272  
Email: [vicber@two-rivers.org](mailto:vicber@two-rivers.org)  
Website: [www.two-rivers.org](http://www.two-rivers.org)



LEGEND

District Zoning Map 2013  
Adopted: March 4, 2013

Conservancy Districts

- C-1 Conservancy
- C-2 Conservancy

Residential Districts

- R-1 I-Family Residential
- R-2 I-2 Family Residential
- R-3 I-2 Family Residential
- R-4 Multi-Family Residential
- CSD Conservation Subdivision District
- PUD Planned Unit Development
- PDD Planned Development District
- TND Traditional Neighborhood Development

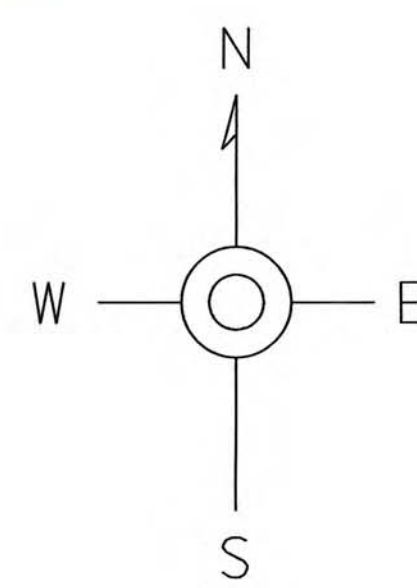
Business Districts

- B-1 Business District
- B-2 Business District
- B-3 Business District
- IPF Institutional/Public Facilities District
- OSB Office Service Business District
- WFB Waterfront Business District

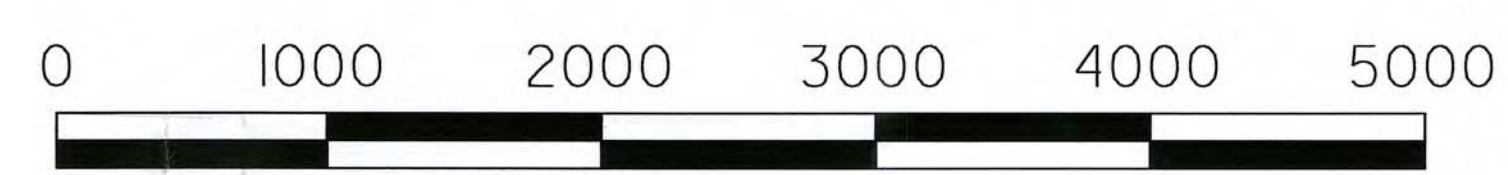
Industrial Districts

- I-1 Industrial District
- I-2 Industrial District
- I-3 Industrial District

--- City Limits



CITY OF TWO RIVERS  
WISCONSIN



Population 11,669

as of  
January 1, 2012

City Engineer's Office



**CITY OF TWO RIVERS  
2013 DISTRICT ZONING MAP**

SOURCE  
PROPERTY

**ATTACHMENT G.4: SIGNED STATEMENT**

Paragon Electric Site, Two Rivers, Wisconsin  
WDNR BRRTS No. 02-36-000153, AECOM Project No. 60236613

**STATEMENT OF VERIFICATION**

As required by s. NR 726.05(3)f of the Wisconsin Administrative Code, I am providing this signed statement that to the best of my knowledge the legal description that is provided in Attachment G.1 of this Closure Request is complete and accurate for the former Paragon Electric property located at 606 Parkway Boulevard, Two Rivers, Wisconsin.

x Paul A. Ahearne      3/27/2023  
(Signature)                      (Date)

PAUL A. AHEARNE  
(Name)

DIR, ENV. PROT  
(Title)

INVENSYS INC, ON BEHALF OF  
(Company)                      RANCO INCORPORATED OF DELAWARE