

02-16-000170
(closed site)



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

1705 Tower Avenue
Superior, WI 54880
TELEPHONE 715-392-7988
TELEFAX 715-392-7993

George E. Meyer
Secretary

December 13, 1996

IN REPLY REFER TO: 3500

Mr. John Gildersleeve
4776 Hermantown Road
Duluth, MN 55811

RE: Hughitt Slip Dock located in the E 1/2 of the SE 1/4 of S10-T49N-R14W, City of Superior, Douglas County.

Dear Mr. Gildersleeve:

This is a follow up to our conversation today regarding your proposal to construct a boat ramp and repair facility on the Hughitt Slip Dock. We reviewed the survey documents that you submitted and an original government plat of the area and determined that part of this dock is located on the upland and, therefore, the owner has riparian rights. This means the owner has the right to apply for a Chapter 30.12, Wisconsin Statutes permit to authorize and maintain the dock and we can proceed with the permit process.

Per our discussion today, I am enclosing a permit application for you to complete. Engineered plans of the both the existing structure and the improvements and documentation attesting to the structural integrity of the dock must be submitted with your application.

As you know, we are not able to make a permit decision on a project until the public has been properly notified and the Department has completed an internal review, however, I will attempt to identify some of our concerns with the project. Please keep in mind that other issues could arise and these comments are not meant to be comprehensive.

The dock must be structurally sound and you may be required to demonstrate that you are financially capable of maintaining the structure. Authorization of the dock and any added improvements, such as the boat ramp that we discussed, must meet the standards outlined in the authorizing statutes and codes. Particular attention should be given to navigational clearance and boater safety.

Proposals for this site must be related to navigation and any boat repair facility should be located on the upland portion of the dock. A stormwater permit will be required if a maintenance facility is constructed. Contact Anne Holy, DNR, 1705 Tower Avenue, Superior, WI 54880, 715-392-0805 for more information.

There are contaminated sediments on the dock and treatment, such as capping, may be required to protect the public from coming in contact with them. For more information about the



To: John Gildersleeve
December 13, 1996
Page 2

requirements, contact Chris Saari, DNR, PO Box 125, Brule, WI 54820, 715-372-4866.

Thank you for your early coordination on the project and feel free to contact me if you have any questions. Also, I would be happy to arrange a meeting with you and other DNR staff if you feel it would be helpful prior to finalizing your plans. I can be reached Monday-Thursday at the Brule Office (715)372-4866 or at the Superior Office on Friday (715)392-0807.

Sincerely,



Amy Mizia
Asst. Water Management Specialist

attach.

cc: John Gozdziwski - NWD
Anne Holy - Superior
Chris Saari - Brule

CARLSON

Florist & Greenhouses

"We outshine the rest"

4776 Hermantown Road

Duluth, MN 55811

(218) 722-3314

11-12-96

NOV 13 1996

Wis. Dept of Natural Resources

P.O. Box 125

Brule, Wis. 54820

Dear Mr Saari:

Please send me a copy of the closure letter for the Hughit Slip property in Superior, Wis., which we discussed on the phone on Thurs 11-7-96.

Thank you!

Yours truly,

John Gildersleeve

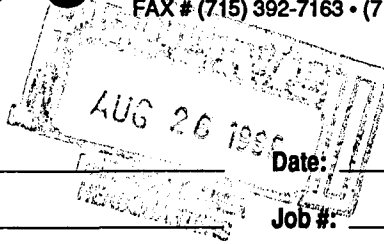
John Gildersleeve

TRANSMITTAL

SINCE 1972

TWIN PORTS TESTING, inc.

1301 NORTH THIRD STREET • SUPERIOR, WISCONSIN 54880
FAX # (715) 392-7163 • (715) 392-7114



To: Chris Saari Date: August 23, 1996
Wisconsin DNR Job #: 599-95E.RA
P.O. Box 125 Client: Norman & Dona Camenker
Brule, Wisconsin 54820 Project: Hughitt Slip Property

We are sending you: Enclosed Airmail Shop Drawings
 Separate Cover 1st Class Other Drawings
 By our Messenger Other Specifications
 By your Messenger Other

# OF COPIES	REPORT/PROPOSAL ID	LATEST DATE	DESCRIPTION OR REMARKS
(2)	DNR Borehole	Abandonment	Forms

THESE ARE TRANSMITTED as checked below:

For approval As requested No Exception Taken Revise & resubmit
For your use For review & comment Make corrections noted Submit specified item

Remarks: DNR site ID # 02-16-000170
Any questions, please call me.
Thank you

COPIES TO: Norman & Dona Camenker Encl. _____ Trans. _____
Sincerely,
Jon Hinkel
(218) 722-1911

All abandonment work shall be performed in accordance with the provisions of Chapters NR 111, NR 112 or NR 141, Wis. Admin. Code, whichever is applicable. Also, see instructions on back.

(1) GENERAL INFORMATION		(2) FACILITY NAME	
Well/Drillhole/Borehole Location <i>Spill Site 3</i>	County <i>Douglas</i>	Original Well Owner (If Known) <i>Norman & Dona Camenker</i>	
NE 1/4 of SE 1/4 of Sec. 10 ; T. 49 N. R. 14 <input type="checkbox"/> E <input checked="" type="checkbox"/> W		Present Well Owner <i>Norman & Dona Camenker</i>	
(If applicable) <i>N/A</i> Gov't Lot <i>N/A</i> Grid Number		Street or Route <i>70 Highgate Road</i>	
Grid Location <i>N/A</i> ft. <input type="checkbox"/> N. <input type="checkbox"/> S. <i>N/A</i> ft. <input type="checkbox"/> E. <input type="checkbox"/> W.		City, State, Zip Code <i>Superior, Wisconsin 54880</i>	
Civil Town Name		Facility Well No. and/or Name (If Applicable)	WI Unique Well No.
		<i>Hughitt Slip Property</i>	-----
Street Address of Well <i>Hughitt Slip Property (no address)</i>		Reason For Abandonment <i>Completion of project</i>	
City, Village <i>Superior, Wisconsin</i>		Date of Abandonment <i>August 23, 1996</i>	

WELL/DRILLHOLE/BOREHOLE INFORMATION		(4) Depth to Water (Feet) <i>approx. 1-foot (Fluctuates)</i>	
(3) Original Well/Drillhole/Borehole Construction Completed On (Date) <i>May 29, 1996</i>		Pump & Piping Removed? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable	
<input checked="" type="checkbox"/> Monitoring Well <input type="checkbox"/> Water Well <input type="checkbox"/> Drillhole <input type="checkbox"/> Borehole		Liner(s) Removed? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable	
Construction Report Available? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		Screen Removed? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable	
Construction Type: <input type="checkbox"/> Drilled <input type="checkbox"/> Driven (Sandpoint) <input type="checkbox"/> Dug <input checked="" type="checkbox"/> Other (Specify) <i>Riser & screen assembly set in place during excavation backfilling.</i>		Casing Left in Place? <input type="checkbox"/> Yes <input type="checkbox"/> No <i>N/A</i>	
Formation Type: <input checked="" type="checkbox"/> Unconsolidated Formation <input type="checkbox"/> Bedrock		If No, Explain <i>no casing - only screen & riser.</i>	
Total Well Depth (ft.) <i>5'</i> ^{<i>riser</i>} Casing Diameter (ins.) <i>2"</i>		Was Casing Cut Off Below Surface? <input type="checkbox"/> Yes <input type="checkbox"/> No <i>N/A</i>	
Casing Depth (ft.) <i>no casing (riser extended 1' approx below surface.)</i>		Did Sealing Material Rise to Surface? <input type="checkbox"/> Yes <input type="checkbox"/> No <i>N/A</i>	
Was Well Annular Space Grouted? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Unknown If Yes, To What Depth? _____ Feet		Did Material Settle After 24 Hours? <input type="checkbox"/> Yes <input type="checkbox"/> No <i>N/A</i>	
		If Yes, Was Hole Retopped? <input type="checkbox"/> Yes <input type="checkbox"/> No <i>N/A</i>	
		(5) Required Method of Placing Sealing Material	
		<input type="checkbox"/> Conductor Pipe-Gravity <input type="checkbox"/> Conductor Pipe-Pumped	
		<input type="checkbox"/> Dump Bailer <input checked="" type="checkbox"/> Other (Explain) <i>gravity feed.</i>	
		(6) Sealing Materials For monitoring wells and monitoring well boreholes only	
		<input type="checkbox"/> Near Cement Grout <input type="checkbox"/> Sand-Cement (Concrete) Grout	
		<input type="checkbox"/> Concrete <input type="checkbox"/> Clay-Sand Slurry	
		<input type="checkbox"/> Bentonite-Sand Slurry <input type="checkbox"/> Chipped Bentonite	
		<input type="checkbox"/> Bentonite Pellets <input checked="" type="checkbox"/> Granular Bentonite	
		<input type="checkbox"/> Bentonite - Cement Grout	

(7) Sealing Material Used	From (Ft.)	To (Ft.)	No. Yards, Sacks/Sealant or Volume	(Circle One)	Mix Ratio or Mud Weight.
<i>bentonite</i>	<i>Surface</i>	<i>1 1/2'</i>	<i>approx. 10</i>		<i>N/A</i>
<i>* fill sand surrounding the well hole? caved in below the water table - addition of bentonite below the water table was impractical.</i>	<i>1 1/2'</i>	<i>5'</i>	<i>---</i>		<i>---</i>

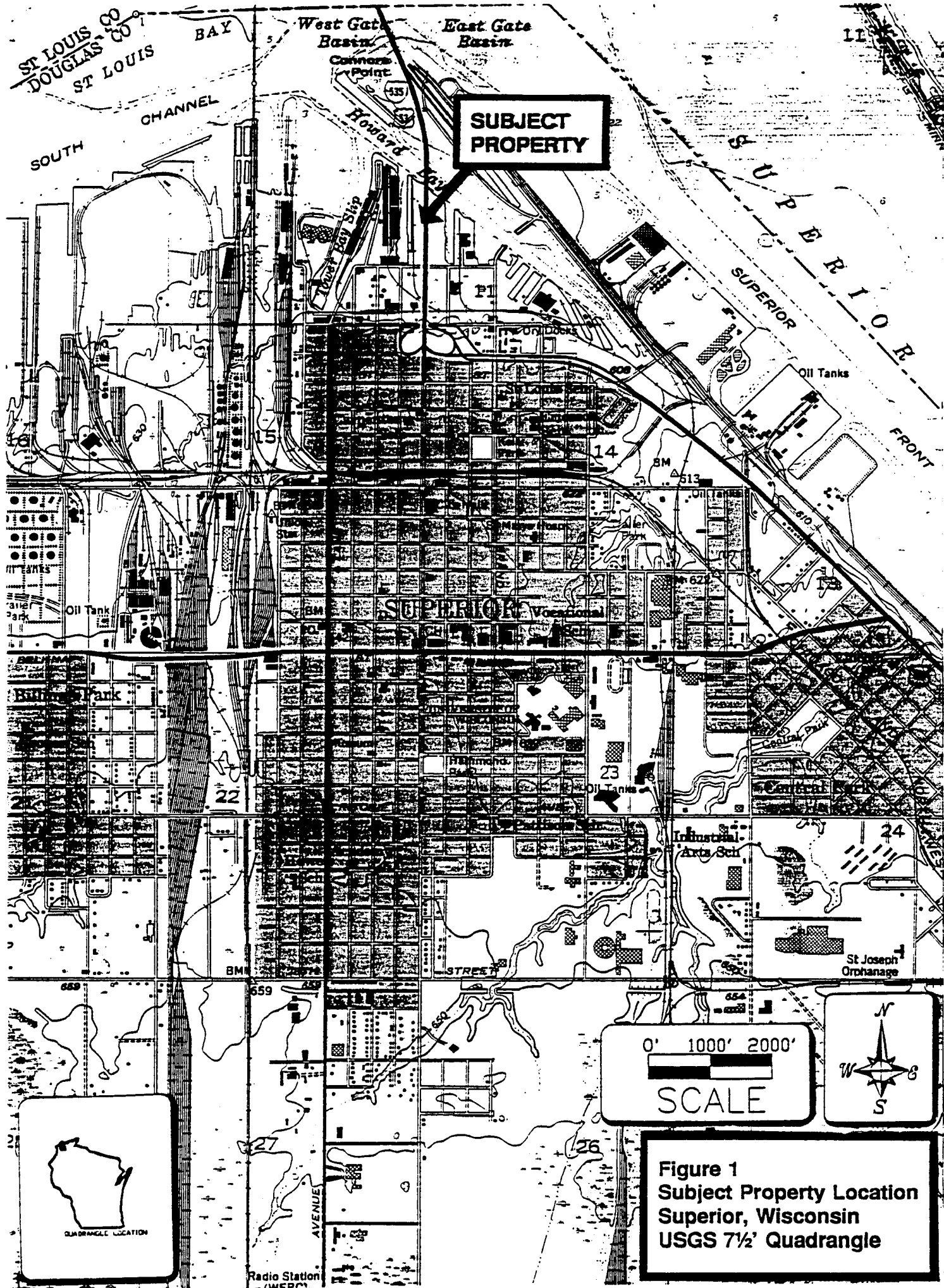
(8) Comments: _____

(9) Name of Person or Firm Doing Sealing Work
Jon Hinkel / Twin Ports Testing Inc.

Signature of Person Doing Work <i>Jon Hinkel</i>	Date Signed <i>August 23, 1996</i>
Street or Route <i>728 Garfield Avenue</i>	Telephone Number <i>(218) 722-1911</i>
City, State, Zip Code <i>Duluth, Minnesota 55805</i>	

(10) FOR DNR OR COUNTY USE ONLY

Date Received/Inspected	District/County
Reviewer/Inspector	<input type="checkbox"/> Complying Work <input type="checkbox"/> Noncomplying Work
Follow-up Necessary	



**SUBJECT
PROPERTY**

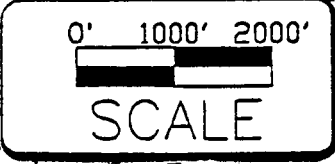
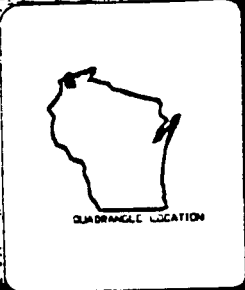
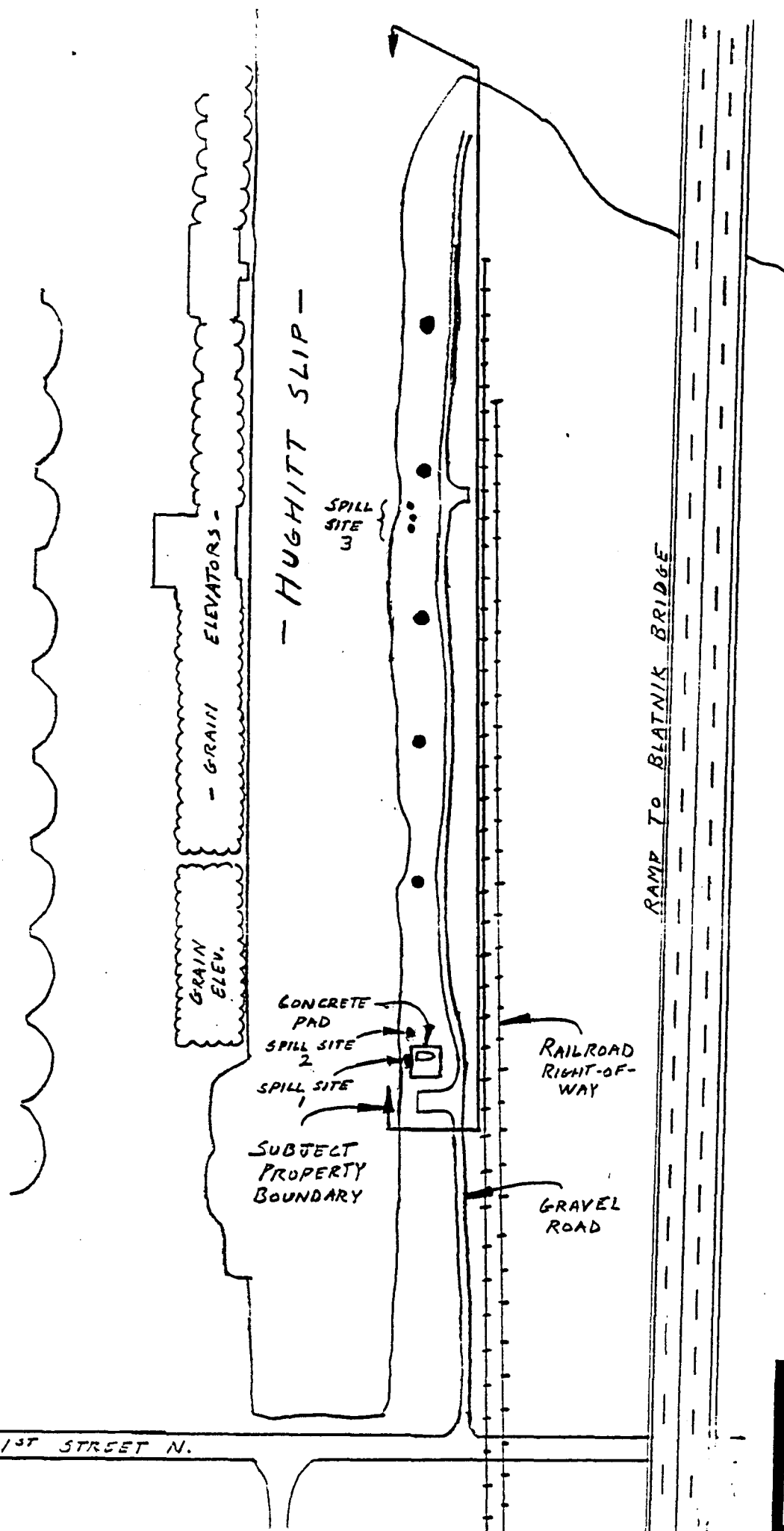


Figure 1
Subject Property Location
Superior, Wisconsin
USGS 7 1/2' Quadrangle





● MORING CLEAT

Figure 2
Site Map
Hughitt Slip Property
Superior, Wisconsin

1ST STREET N.

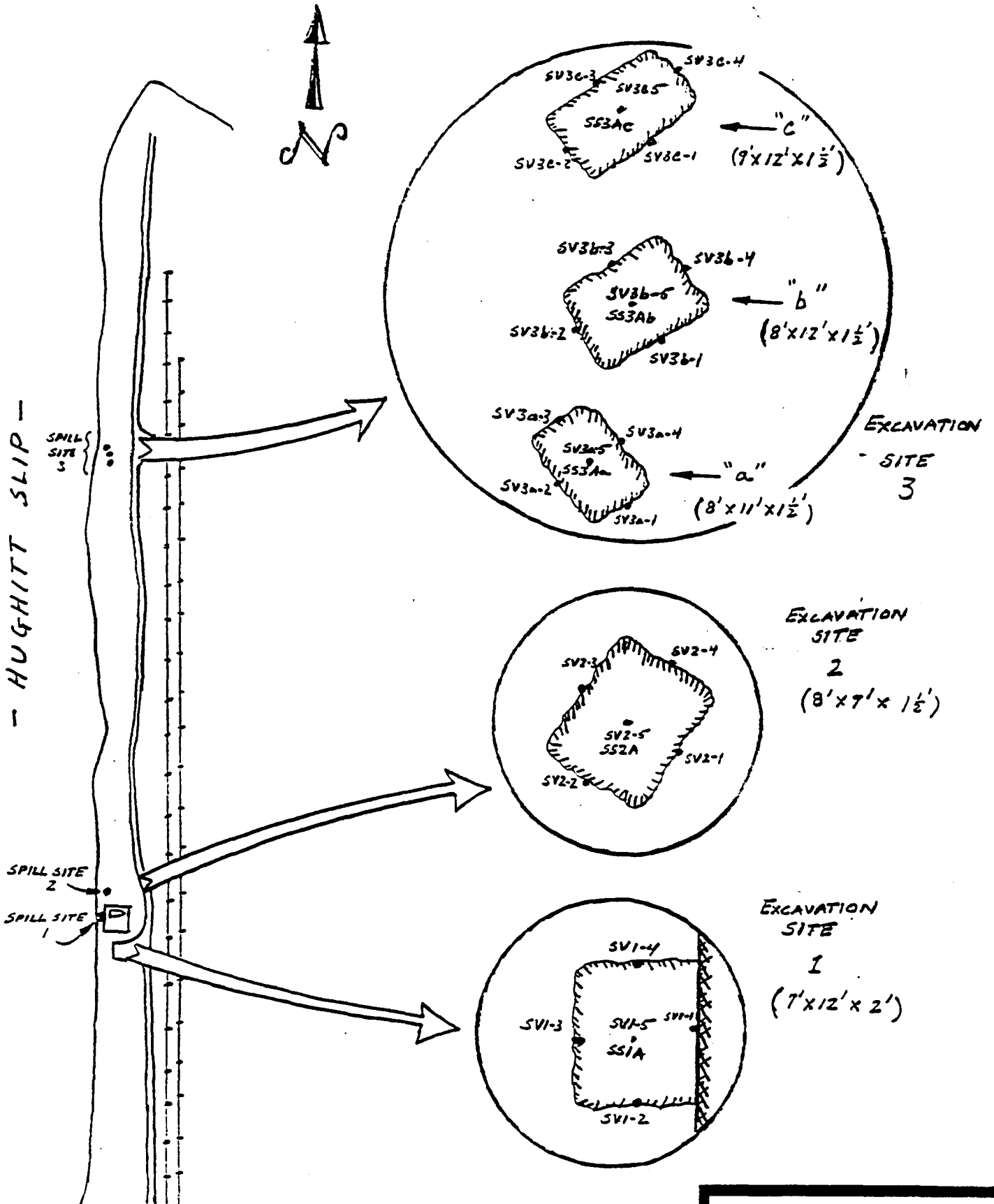
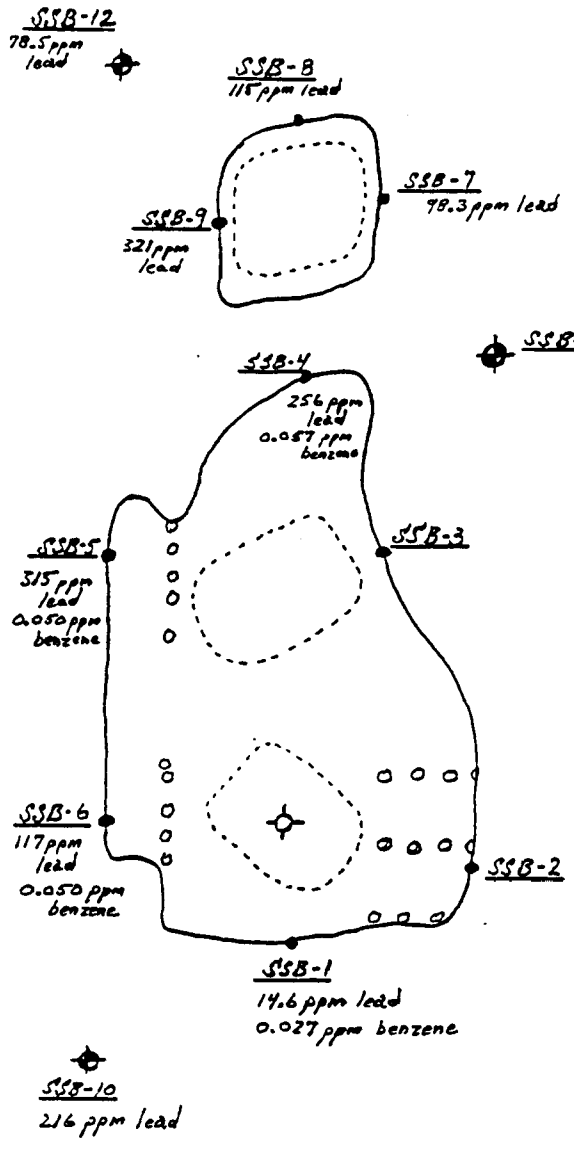


Figure 3
Initial Site Excavations
Hughitt Slip Property
Superior, Wisconsin

- HUGHITT SLIP -



- = final excavation boundary
- = location of initial excavation
- = permanent wood piling
- = temporary monitoring well location
- = hand auger boring location
- = soil sampling location

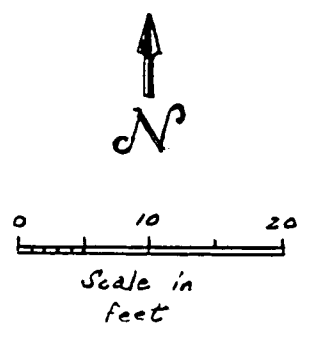


Figure 4
Final Excavations/Additional Test Borings
Hughitt Slip Property
Superior, Wisconsin

SSB-13



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Tommy G. Thompson, Governor
George E. Meyer, Secretary
William H. Smith, District Director

Brule Area Headquarters
6250 South Ranger Road
P.O. Box 125
Brule, WI 54820-0125
TELEPHONE 715-372-4866
TELEFAX 715-372-4836

August 9, 1996

FILE COPY

MR & MRS NORMAN CAMENKER
70 HIGHGATE COURT
SUPERIOR WI 54880

Re: Site Closure - Hughitt Slip Property (Case #02-16-000170), Superior, Wisconsin

Dear Mr. and Mrs. Camenker:

On December 8, 1995, the Department of Natural Resources provided a notice to you that the degree and extent of environmental contamination at the above named site was required to be investigated and remediated. We have since been informed that the required investigation and remediation has been accomplished.

On August 6, 1996, I presented this case to the Northwest District Close Out Committee for a determination as to whether or not the case qualified for close out under ch. NR 726, Wis. Adm. Code. After evaluating the investigative and remedial documentation provided by Twin Ports Testing, Inc. (TPT), the Committee concurred with your consultant's recommendation for no further action. However, the Committee specified two conditions for closure of the site:

1. Based on the lead concentrations remaining in soil here, this site has met the residual contaminant level for direct contact with lead at an industrial site, as described in s. NR 720.11, Wis. Adm. Code. If the intended future use of this site is other than an industrial property, further remediation of lead contaminated soil must be completed to meet the non-industrial residual contaminant level of s. NR 720.11.
2. If the temporary monitoring well remains at the site, it must be abandoned in accordance with the requirements of ch. NR 141, Wis. Adm. Code.

Based on the investigative and remedial documentation provided to the Department, it appears that the petroleum contamination at the above named site has been remediated in compliance with the requirements of chs. NR 700 to 724, Wis. Adm. Code. Therefore, the Department considers the case "closed", having determined that no further action is necessary at the site at this time. However, the case may be reopened pursuant to s. NR 726.09, Wis. Adm. Code, if additional information regarding site conditions indicates that contamination on or from the site poses a threat to public health, safety or welfare, or the environment.

You should note that this letter does not constitute Department "certification" under s. 144.765 (2) (a) 3, Wis. Stats., as created by 1993 Wisconsin Act 453 (May 12, 1994). Persons who meet the definition of "purchaser" in s. 144.765 (1) (c), must receive Department pre-approval prior to conducting a site investigation in order to be eligible for the liability exemption under s. 144.765, Wis. Stats.

Mr. and Mrs. Norman Camenker - August 9, 1996

2

If you have any questions concerning this letter or the project in general, please do not hesitate to write or call me at 715/372-4866.

Sincerely,



Christopher A. Saari
Hydrogeologist

cc: Jon Hinkel - TPT
David Knight (by facsimile)

ЛИТЕ СОБА

To Chris Sauri

Date 8-8 Time 3:50 AM PM

WHILE YOU WERE OUT

M Steve Knight

of Resistor (FAX #) 715-394-5890

Phone ()
Area Code Number Extension

TELEPHONED	<input type="checkbox"/>	PLEASE CALL	<input type="checkbox"/>
CALLED TO SEE YOU	<input type="checkbox"/>	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	<input type="checkbox"/>	URGENT	<input type="checkbox"/>

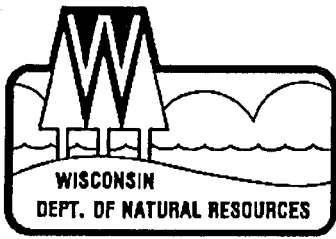
RETURNED YOUR CALL

Message Re: Closure. Haggett
slip owned by Cobblers.
Steve needs a FAX on
Closure!

Operator



REORDER #23-000



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Tommy G. Thompson, Governor
George E. Meyer, Secretary
William H. Smith, District Director

Brule Area Headquarters
6250 South Ranger Road
P.O. Box 125
Brule, WI 54820-0125
TELEPHONE 715-372-4866
TELEFAX 715-372-4836

August 9, 1996

MR & MRS NORMAN CAMENKER
70 HIGHGATE COURT
SUPERIOR WI 54880

Re: Site Closure - Hughitt Slip Property (Case #02-16-000170), Superior, Wisconsin

Dear Mr. and Mrs. Camenker:

On December 8, 1995, the Department of Natural Resources provided a notice to you that the degree and extent of environmental contamination at the above named site was required to be investigated and remediated. We have since been informed that the required investigation and remediation has been accomplished.

On August 6, 1996, I presented this case to the Northwest District Close Out Committee for a determination as to whether or not the case qualified for close out under ch. NR 726, Wis. Adm. Code. After evaluating the investigative and remedial documentation provided by Twin Ports Testing, Inc. (TPT), the Committee concurred with your consultant's recommendation for no further action. However, the Committee specified two conditions for closure of the site:

1. Based on the lead concentrations remaining in soil here, this site has met the residual contaminant level for direct contact with lead at an industrial site, as described in s. NR 720.11, Wis. Adm. Code. If the intended future use of this site is other than an industrial property, further remediation of lead contaminated soil must be completed to meet the non-industrial residual contaminant level of s. NR 720.11.
2. If the temporary monitoring well remains at the site, it must be abandoned in accordance with the requirements of ch. NR 141, Wis. Adm. Code.

Based on the investigative and remedial documentation provided to the Department, it appears that the petroleum contamination at the above named site has been remediated in compliance with the requirements of chs. NR 700 to 724, Wis. Adm. Code. Therefore, the Department considers the case "closed", having determined that no further action is necessary at the site at this time. However, the case may be reopened pursuant to s. NR 726.09, Wis. Adm. Code, if additional information regarding site conditions indicates that contamination on or from the site poses a threat to public health, safety or welfare, or the environment.

You should note that this letter does not constitute Department "certification" under s. 144.765 (2) (a) 3, Wis. Stats., as created by 1993 Wisconsin Act 453 (May 12, 1994). Persons who meet the definition of "purchaser" in s. 144.765 (1) (c), must receive Department pre-approval prior to conducting a site investigation in order to be eligible for the liability exemption under s. 144.765, Wis. Stats.

Mr. and Mrs. Norman Camenker - August 9, 1996

2

If you have any questions concerning this letter or the project in general, please do not hesitate to write or call me at 715/372-4866.

Sincerely,

A handwritten signature in cursive script that reads "Christopher A. Saari".

Christopher A. Saari
Hydrogeologist

cc: Jon Hinkel - TPT
David Knight (by facsimile)

NWD CASE SUMMARY AND CLOSE OUT FORM

Close Out Option: Committee Fast Track DNR Project Manager: _____
Priority: High Medium Low Type of Release: LUST Spill Other Unknown

Site Name: Hughitt Slip Property DNR Case No. 16-00170

Address/Location: North of N. 1st Street City/Vill/Tn: Superior, Wisconsin

Legal Description: NE 1/4, SE 1/4, Sec 10, T 49 N, R 14 (E/W) County: Douglas

Contaminant Type(s) or petroleum Quantity Released unknown

Tank Volume/Product: (if known):
spill sites - no tank involved

Date of Incident (Discovered) 12/8/95* Date Closure Form Submitted to DNR: 7/96

Depth to Groundwater/Flow Direction: approx. 2 1/2 feet, Perched Water? Y X N Depth: N/A
assumed northwestward, but may vary locally.

Potential Receptors: none identified

Site Assessment Consultant: Twin Ports Testing, Inc., 728 Garfield Avenue, Duluth MN

Investigation/Remediation Consultant: same as above

Certified Lab Testing Soils/Water: Lake Superior Laboratories (same address as above)

Form 4 Pending? Yes No

Status of water supply wells on property?
No water supply wells appear to exist on the property or within 1/4 mile of the property.

Status of water supply wells on adjoining properties?
No water supply wells appear to exist on adjoining properties.

LUST ANALYTICAL AND QUALITY ASSURANCE GUIDANCE (PUBL-SW-130 93) FOLLOWED X Y N
Form completed by:

Name: Jon Hinkel Firm Name: Twin Ports Testing Inc.

Address: 728 Garfield Avenue

City: Duluth State: MN Zip: 55802

Telephone Number: (218) 722-1911

(Signature) Jon Hinkel

* Contamination was identified and reported to the DNR on 8/29/95 by Twin Ports Testing, Inc. DNR files list the date of case opening as 12/8/95, however.

POST REMEDIATION SAMPLING RESULTS

Remedial Action Completed? Y N

Description: *Contaminated soil excavated and treated/landfilled.*

Map Sample No.	Depth (feet)	DRO (ppb) ppm	GRO (ppb)	Benzene (ppb)	Toluene (ppb)	Ethyl-benzene (ppb)	Xylenes (ppb)	PID (ppm)	Other (ppb) lead ppm	Other (ppb) *
SS1A	2'	5.10	--	<	<	<	<	4.9	<	
SS2A	2'	<	--	<	<	<	<	0.0	<	
SSB1	2'	<	--	0.027	0.077	<	<	0.0	14.6	
SSB2	2'	<	--	<	<	<	<	0.0	<	
SSB3	2'	<	--	<	<	<	<	0.0	<	
SSB4	2'	61.5	--	0.057	0.094	0.050	0.160	0.0	256	
SSB5	2'	29.2	--	0.050	0.081	0.052	0.190	0.0	315	
SSB6	2'	22.3	--	0.050	0.084	0.053	0.180	0.0	117	
SSB7	2'	<	--	<	<	<	<	0.0	98.3	
SSB8	2'	<	--	<	0.049	0.044	0.140	0.0	115	
SSB9	2'	71.1	--	<	0.060	0.058	0.180	0.0	321	
SSB10	2'	--	--	<	<	<	<	--	216	
SSB11	2'	--	--	<	<	<	<	--	<	
SSB12	2'	--	--	<	<	<	<	--	78.5	
SSB13	2'	--	--	--	--	--	--	--	--	

* see lab reports for other detected parameters

Description of remedial action taken:

Contaminated soil was removed from the site by excavation, and disposed of at a local thermal treatment plant and a remote landfill. Excavations were backfilled using uncontaminated soil from off site.

Were Soils Excavated? Y N Quantity: *146 cu.yds* Disposal Method: *thermal treatment/landfilling*

Soil Disposal Form Attached? Y N Final Disposal Location: *Jackson County Landfill*

COMMITTEE RECOMMENDATION: Further Work Needed: Date: _____

DUE TO LEAD, AS AN INDUSTRIAL SITE

CASE CLOSE OUT:

Date: *8-6-96*

[Signature]

(Signature)

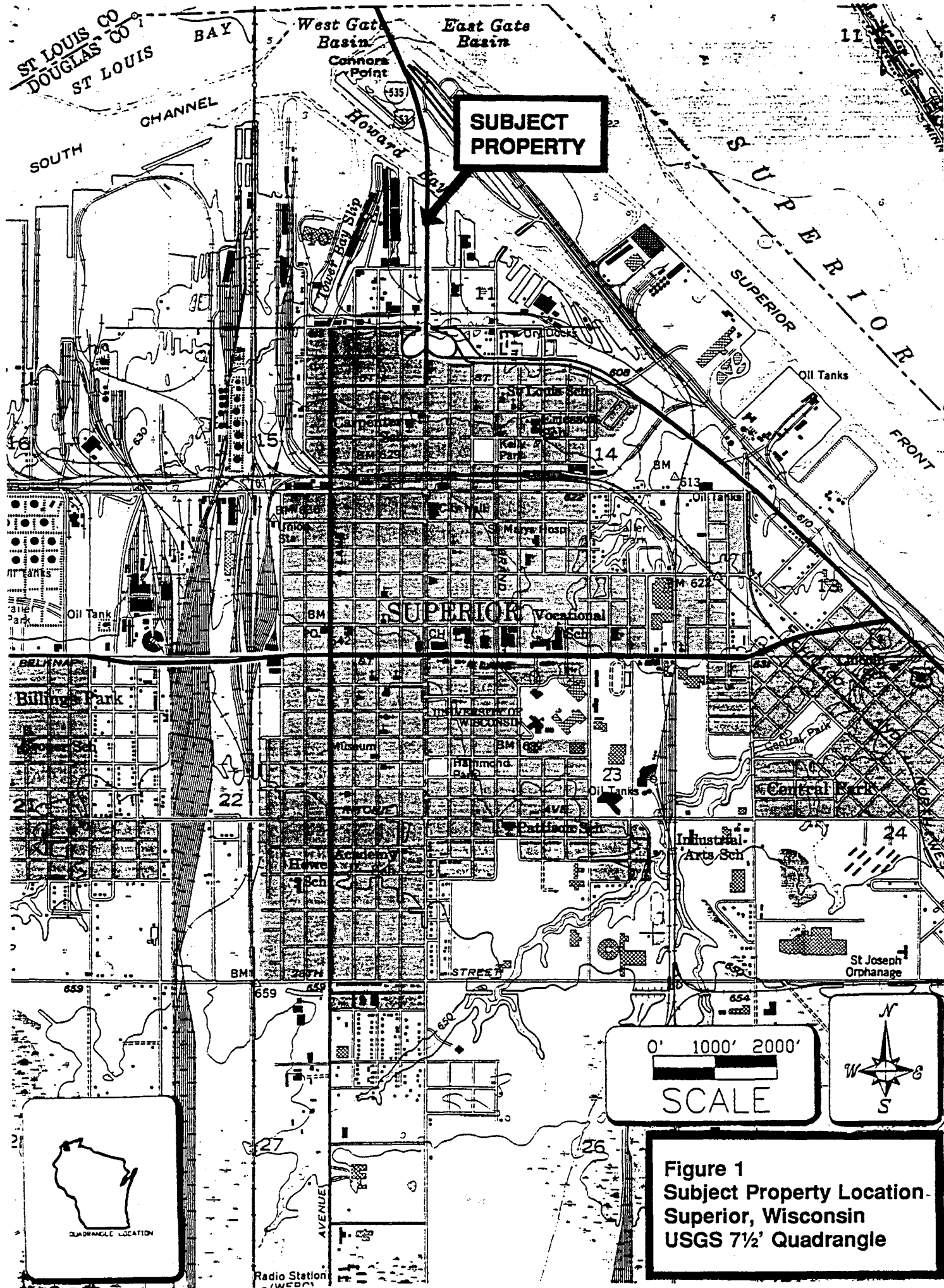
John J. Prohaska

(Signature)

Thomas J. Reagin

(Signature)

(Signature)



SUBJECT PROPERTY

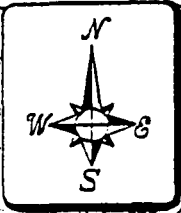
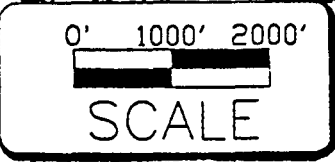
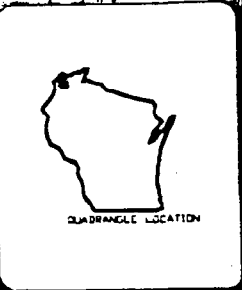
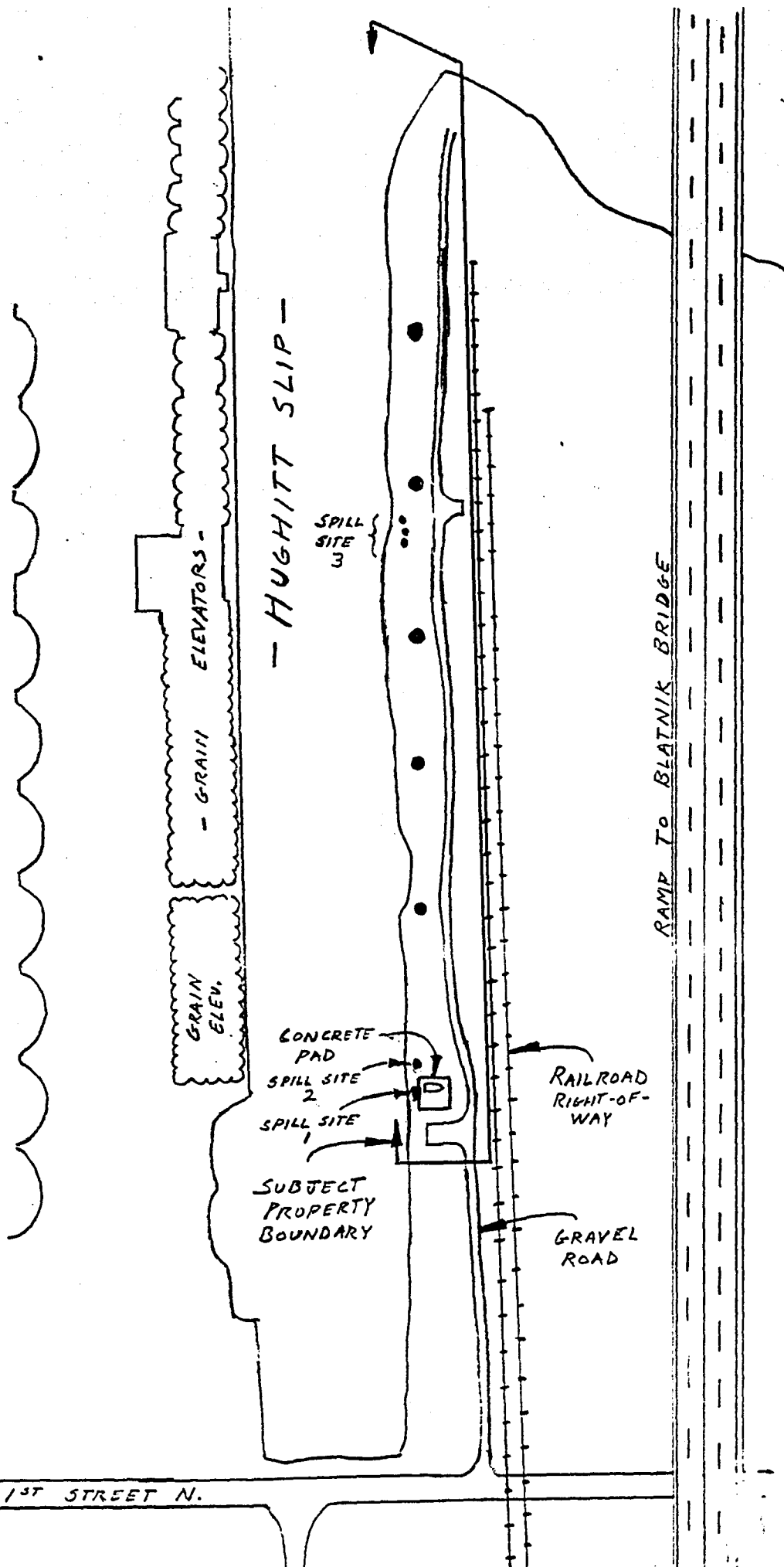


Figure 1
Subject Property Location-
Superior, Wisconsin
USGS 7½' Quadrangle





● MORING CLEAT

Figure 2
Site Map
Hughitt Slip Property
Superior, Wisconsin

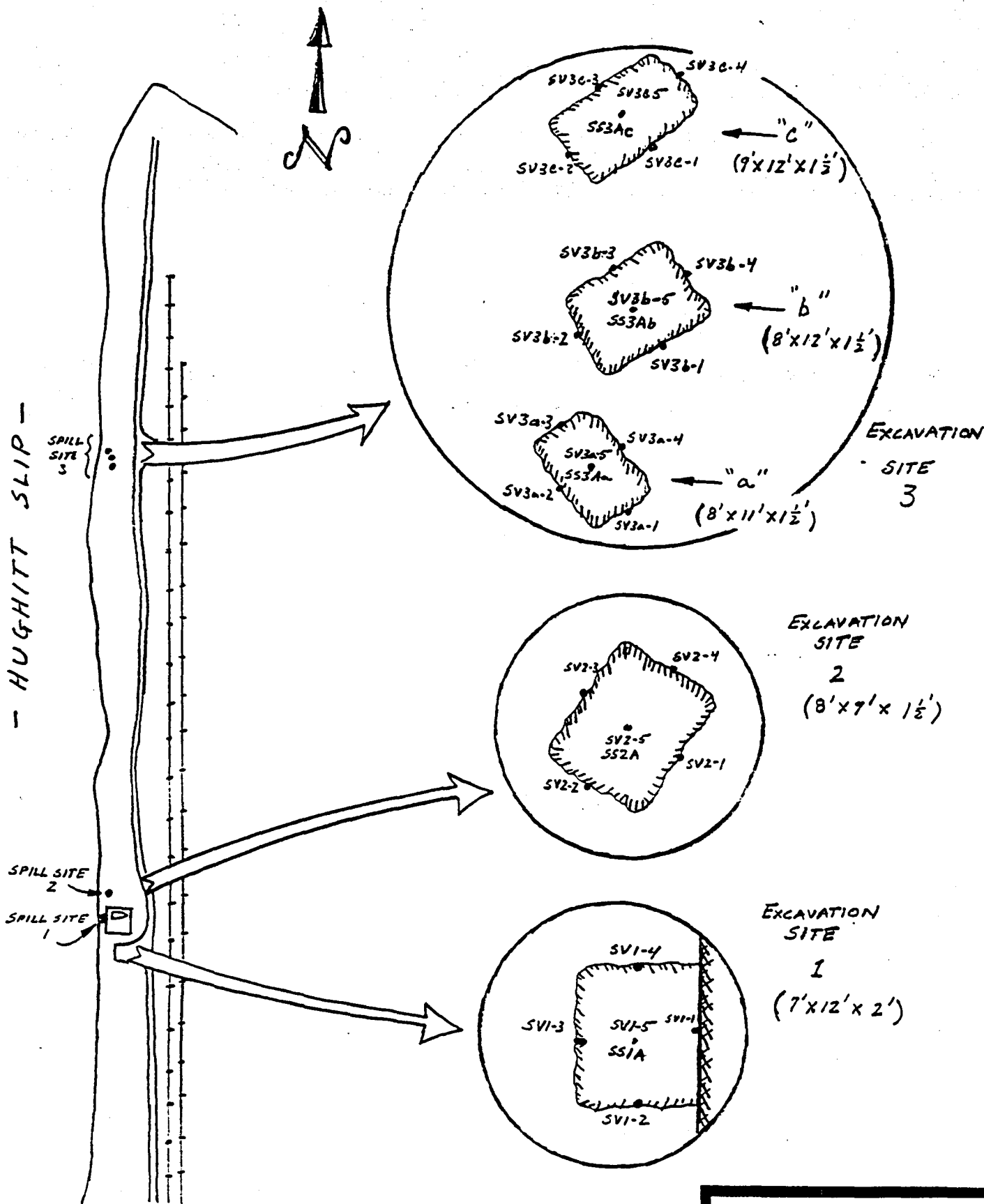


Figure 3
Initial Site Excavations
Hughitt Slip Property
Superior, Wisconsin

HUGHITT SLIP -

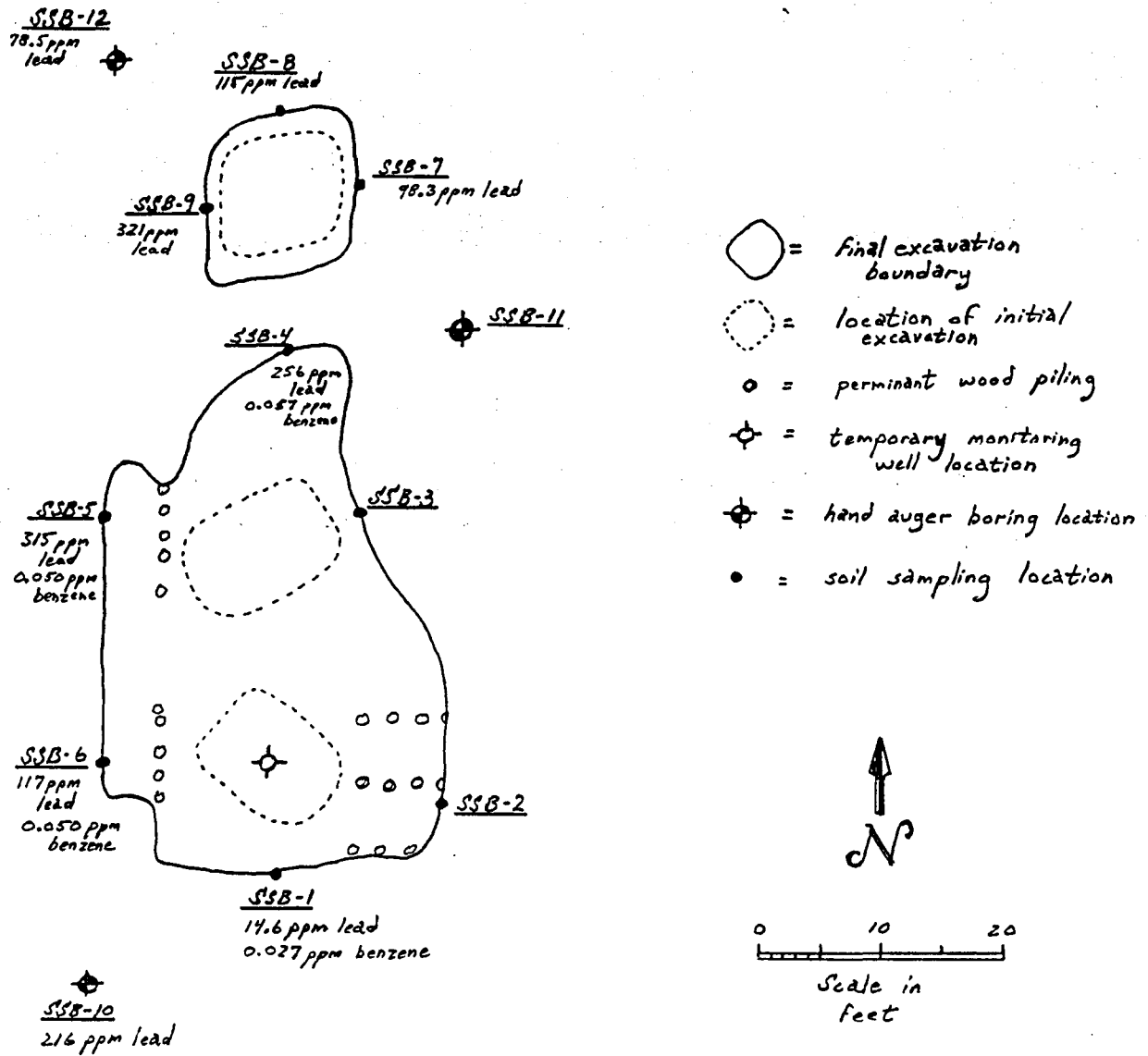


Figure 4
Final Excavations/Additional Test Borings
Hughitt Slip Property
Superior, Wisconsin

Twin Ports Testing, Inc.

Soil Boring Field Log

Client Norman and Dora Cemenker
 Project Hughitt Slip Property
 Boring Location East of the excavations
 Weather Mild (73°F) windy, partly sunny

Boring # SSB-11
 TPT JOB # 599-95E
 Page 1 of 1
 Date Start 3-11-96 Date End 3-11-96
 Crew Chief Jon Hinkel
 Helper —
 Rig → Other Tech. (Hand Auger Boring)

Sample #	Sample Type	SAMPLE			PENETRATION RECORD				N-Value (A+B)	SP	PID	
		Start Depth	Sample Distance	Recovery Length	0'-6"	A 6'-12"	B 12'-18"	18'-24"				
SSB-11		0	2	2								Medium to coarse grained black and brown sand and 1/2-1" dia. gravel; minor wood
		2	3									Brown medium grained sand, coarse grained sand, minor gravel
												SSB-11 collected at 2.3' deep at 2:00 pm
												bore hole abandoned with bentonite 2:20 pm

Surface Elevation 0.0
 Cave In Level —
 Remarks Frost approx 1.8' deep

WATER LEVEL OBSERVATIONS

WL1 2.5'
 WL2 _____
 WL3 _____
 WL4 _____

Water Table 2.5'



University of Wisconsin-Extension

Wisconsin Geological and Natural History Survey
3817 Mineral Point Road - Madison, WI 53705-5100
TELEPHONE 608/262.1705 - FAX 608/262.8086
James M. Robertson, Director and State Geologist

FACSIMILE TRANSMISSION COVER SHEET

DATE 5/28/96

FROM K. Massie Ferch DIRECT TELEPHONE 608-262-9468

FAX NUMBER: 608/262-8086

MAIN OFFICE TELEPHONE: 608/262-1705



TO Jon Hinkel

FAX NUMBER 218-722-3295 TELEPHONE NUMBER 218-722-1911

ORGANIZATION/ADDRESS Twin Ports Testing, Inc.

NUMBER OF PAGES, INCLUDING COVER PAGE 3
[Please let us know if all pages are not received.]

COMMENTS:

You requested construction reports for
Sec 10 & 11, 49N, 14W
on geologic logs.
There are no records in this area.

TABLE 6
Groundwater Analysis Results
Hughitt Slip Property
Superior, Wisconsin

Sample # Collection Date	Parameter, Concentration (ppb)					
	DRO	VOCs			Lead	PAHs
		Toluene	n-Butylbenzene	Naphthalene		
WS-1 1/17/96	492	<	--	--	<	--
WS-2 5/30/96	113	<	1.4	3.0	11.1	<
Field Blank 5/30/96	--	2.1	<	<	--	--
Wisconsin DNR Enforcement Standard	--	343	--	40	15	various

- ppb - parts per billion, equivalent to micrograms per kilogram (mg/kg)
- DRO - diesel range organics
- VOCs - volatile organic compounds
- PAHs - polynuclear aromatic hydrocarbons
- < - concentration less than laboratory method detection limits
- - analysis not performed/enforcement standard not established

**TABLE 5
ANALYSIS RESULTS
FINAL EXCAVATIONS/ADDITIONAL TEST BORINGS
HUGHITT SLIP PROPERTY
SUPERIOR, WISCONSIN**

Soils		Parameter, Concentration (ppm)						
Location	Sample #	PAHs						
		Fluoranthene	Fluorene	Indeno[1,2,3-cd]pyrene	1-Methyl Naphthalene	Naphthalene	Phenanthrene	Pyrene
Excavation Enlargement Sites 1 & 2	SSB-1	--	--	--	--	--	--	--
	SSB-2	--	--	--	--	--	--	--
	SSB-3	0.0512	<	<0.0160	--	<	0.0186	0.0605
	SSB-4	--	--	--	--	--	--	--
	SSB-5	--	--	--	--	--	--	--
	SSB-6	0.447	<	<0.080	--	<	0.223	0.503
Excavation Enlargement Site 3	SSB-7	--	--	--	--	--	--	--
	SSB-8	--	--	--	--	--	--	--
	SSB-9	1.120	<	<0.160	--	<	0.713	1.290
Test Borings	SB-10	2.250	0.255	0.501	0.191	0.401	1.890	2.400
	SB-11	0.0253	<	<	0.00950	0.00517	0.0285	<
	SB-12	1.530	<	0.353	<	0.0609	0.275	0.964
	SB-13 (control)	0.0467	<	0.00710	.0163	0.00950	0.0406	<
Wisconsin DNR Enforcement Standard/Interim Soil Cleanup Guideline		--	--	--	--	--	--	--

ppm = parts per million, equivalent to milligrams per kilogram (mg/kg)
 PAHs = polynuclear aromatic hydrocarbons
 TMB = trimethylbenzene
 MTBE = methyl tertiary butyl ether
 < = concentration below laboratory method detection limit

VOCs = volatile organic compounds
 DRO = diesel range organics
 BB = butylbenzene
 TCB = trichlorobenzene
 -- = analysis not performed/DNR guideline does not exist

**TABLE 5
ANALYSIS RESULTS
FINAL EXCAVATIONS/ADDITIONAL TEST BORINGS
HUGHITT SLIP PROPERTY
SUPERIOR, WISCONSIN**

Soils		Parameters, Concentrations (ppm)					
Location	Sample #	PAHs					
		Benzo[a]pyrene	Benzo[b]fluoranthene	Benzo[k]fluoranthene	Benzo[g,h,i]perylene	Chrysene	Dibenzo[a,h]anthracene
Excavation Enlargement Sites 1 & 2	SSB-1	--	--	--	--	--	--
	SSB-2	--	--	--	--	--	--
	SSB-3	0.0237	0.0195	0.0116	<0.0640	0.0363	<0.040
	SSB-4	--	--	--	--	--	--
	SSB-5	--	--	--	--	--	--
	SSB-6	0.134	0.117	0.0614	<0.320	0.235	<0.200
Excavation Enlargement Site 3	SSB-7	--	--	--	--	--	--
	SSB-8	--	--	--	--	--	--
	SSB-9	0.387	0.249	0.146	<0.640	0.618	<0.400
Test Borings	SB-10	0.892	0.734	0.270	<	<	<
	SB-11	0.00887	0.00735	0.00347	<	<	<
	SB-12	0.610	0.476	0.172	0.302	0.508	<
	SB-13 (control)	0.0163	0.0145	0.00696	0.00429	<	<
Wisconsin DNR Enforcement Standard/Interim Soil Cleanup Guideline		--	--	--	--	--	--

ppm = parts per million, equivalent to milligrams per kilogram (mg/kg)
 PAHs = polynuclear aromatic hydrocarbons
 TMB = trimethylbenzene
 MTBE = methyl tertiary butyl ether
 < = concentration below laboratory method detection limit

VOCs = volatile organic compounds
 DRO = diesel range organics
 BB = butylbenzene
 TCB = trichlorobenzene
 -- = analysis not performed/DNR guideline does not exist

**TABLE 5
ANALYSIS RESULTS
FINAL EXCAVATIONS/ADDITIONAL TEST BORINGS
HUGHITT SLIP PROPERTY
SUPERIOR, WISCONSIN**

Soils		Parameter, Concentration (ppm)							
Location	Sample #	VOCs				Lead	PAHs		
		n-BB	Naphthalene	1,2,3-TCB	1,2,4-TCB		Acenaphthene	Anthracene	Benzo[a]anthracene
Excavation Enlargement Sites 1 & 2	SSB-1	--	--	--	--	14.6	--	--	--
	SSB-2	--	--	--	--	<	--	--	--
	SSB-3	--	--	--	--	<	<	<	0.0260
	SSB-4	--	--	--	--	256	--	--	--
	SSB-5	--	--	--	--	315	--	--	--
	SSB-6	--	--	--	--	117	0.419	0.0324	0.156
Excavation Enlargement Site 3	SSB-7	--	--	--	--	98.3	--	--	--
	SSB-8	--	--	--	--	115	--	--	--
	SSB-9	--	--	--	--	321	0.859	0.0807	0.421
Test Borings	SB-10	0.049	0.037	0.035	<	216	<	0.473	0.708
	SB-11	0.035	<	<	0.040	<	<	<	<
	SB-12	0.042	0.026	0.027	0.048	78.5	<	0.0930	0.392
	SB-13 (control)	--	--	--	--	--	<	<	0.00829
Wisconsin DNR Enforcement Standard/Interim Soil Cleanup Guideline		--	--	--	--	--	--	--	--

ppm = parts per million, equivalent to milligrams per kilogram (mg/kg)
 PAHs = polynuclear aromatic hydrocarbons
 TMB = trimethylbenzene
 MTBE = methyl tertiary butyl ether
 < = concentration below laboratory method detection limit

VOCs = volatile organic compounds
 DRO = diesel range organics
 BB = butylbenzene
 TCB = trichlorobenzene
 -- = analysis not performed/DNR guideline does not exist

**TABLE 5
ANALYSIS RESULTS
FINAL EXCAVATIONS/ADDITIONAL TEST BORINGS
HUGHITT SLIP PROPERTY
SUPERIOR, WISCONSIN**

Soils		Parameter, Concentration (ppm)								
Location	Sample #	DRO	VOCs							
			Benzene	Toluene	Ethylbenzene	Xylenes	1,3,5-TMB	1,2,4-TMB	MTBE	sec-BB
Excavation Enlargement Area of Sites 3a & 3b	SSB-1	<	0.027	0.077	<	<	<	<	0.098	--
	SSB-2	<	<	<	<	<	<	<	<	--
	SSB-3	<	<	<	<	<	<	<	<	--
	SSB-4	61.5	0.057	0.094	0.050	0.160	0.036	0.052	<	--
	SSB-5	29.2	0.050	0.081	0.052	0.190	0.047	0.064	<	--
	SSB-6	22.3	0.050	0.084	0.053	0.180	0.043	0.059	<	--
Excavation Enlargement Site 3c	SSB-7	<	<	<	<	<	<	<	<	--
	SSB-8	<	<	0.049	0.044	0.140	0.039	0.051	<	--
	SSB-9	71.1	<	0.060	0.058	0.180	0.053	0.061	<	--
Test Borings	SSB-10	--	<	<	<	<	<	0.026	--	0.026
	SSB-11	--	<	<	<	<	<	<	--	<
	SSB-12	--	<	<	<	<	<	<	--	<
	SB-13 (control)	--	--	--	--	--	--	--	--	--
Wisconsin DNR Enforcement Standard/Interim Soil Cleanup Guideline		100	0.0055	1.500	2.900	4.100	--	--	--	--

ppm = parts per million, equivalent to milligrams per kilogram (mg/kg)
 PAHs = polynuclear aromatic hydrocarbons
 TMB = trimethylbenzene
 MTBE = methyl tertiary butyl ether
 < = concentration below laboratory method detection limit

VOCs = volatile organic compounds
 DRO = diesel range organics
 BB = butylbenzene
 TCB = trichlorobenzene
 -- = analysis not performed/DNR guideline does not exist

Soil Vapor Sample (Sample #)	Depth in Feet	PID Reading in ppm
SV-22	2.5	0.0
SV-23	1.5	0.0
SV-24	2.5	0.0
SV-25	1.5	0.0
SV-26	2.5	0.0
SV-27	1.5	0.0
SV-28	2.5	0.0
SV-29	1.5	0.0
SV-30	2.5	0.0
SV-31	1.5	0.0
SV-32	2.5	0.0
SV-33	1.5	0.0
SV-34	2.5	0.0
SV-35	1.5	0.0
SV-36	2.5	0.0

Notes: PID = photoionization detector
 ppm = parts per million organic vapors
 * = area excavated following sample collection and field screening

During the field work, the water table appeared to lie approximately 2.5 feet below the surface.

TABLE 4
Field Screening Results
Final Excavations
Hughitt Slip Property
Superior, Wisconsin

Soil Vapor Sample (Sample #)	Depth in Feet	PID Reading in ppm
SV-1	1.5	0.0
SV-2	2.5	0.0
SV-3	1.5	0.0
SV-4	2.5	0.0
SV-5	1.5	0.0
SV-6	2.5	0.0
SV-7	1.5	0.0
SV-8	2.5	0.0
SV-9	1.5	146*
SV-10	2.5	90.0*
SV-11	1.5	40.0*
SV-12	2.5	50.7*
SV-13	1.5	5.1*
SV-14	2.5	1.1*
SV-15	1.5	0.0
SV-16	2.5	0.4
SV-17	1.5	0.0
SV-18	2.5	0.0
SV-19	1.5	0.0*
SV-20	2.5	29.9*
SV-21	1.5	0.0

**TABLE 3
Analysis Results
Initial Excavations
Hughitt Slip Property
Superior, Wisconsin**

Location	Soil Sample Number	Parameter, concentration (ppm)								
		DRO	Benzene	Toluene	Ethylbenzene	Xylenes	1,3,5-TMB	1,2,4-TMB	MTBE	Lead
Site 1	SS1A	5.10	< (at 0.005)	<	<	<	<	<	<	<
Site 2	SS2A	<	< (at 0.005)	<	<	<	<	<	<	<
Site 3a	SS3Aa	4240	< (at 0.025)	0.765	0.238	2.51	1.31	8.41	<	254
Site 3b	SS3Ab	11.8	0.019	0.219	<	<	<	<	<	257
Site 3c	SS3Ac	8.26	< (at 0.010)	<	<	<	<	<	<	160
Wisconsin DNR Interim Soil Cleanup Guideline/Maximum Allowable Leachable Metal Concentration		100	0.0055	1.5	2.9	4.1	--	--	--	--

DRO - diesel range organics
 MTBE - methyl tertiary butyl ether
 (at ___) - laboratory method detection limit

ppm - parts per million, equivalent to milligrams per kilogram or mg/kg
 < - concentration below laboratory method detection limits
 TMB - trimethylbenzene

**Table 2
Field Screening Results, Initial Excavations
Hughitt Slip Property
Superior, Wisconsin**

Location	Sample Number	Organic Vapor Concentration (ppm)
Excavation Site 1	SV1-1	31.5
	SV1-2	67.0
	SV1-3	71.7
	SV1-4	12.8
	SV1-5	4.9
Excavation Site 2	SV2-1	0.0
	SV2-2	0.0
	SV2-3	0.0
	SV2-4	0.0
	SV2-5	0.0
Excavation Site 3a	SV3a-1	11.3
	SV3a-2	96.2
	SV3a-3	127
	SV3a-4	134
	SV3a-5	155
Excavation Site 3b	SV3b-1	3.3
	SV3b-2	2.7
	SV3b-3	2.4
	SV3b-4	2.1
	SV3b-5	3.9
Excavation Site 3c	SV3c-1	3.3
	SV3c-2	1.8
	SV3c-3	1.8
	SV3c-4	1.5
	SV3c-5	1.5

Note: • Organic vapor concentrations provided in parts per million (ppm)
 • All soil vapor samples were collected at the excavation bases, 1½ to 2½ feet below the surface.

**Table 1
Phase II Soil Analysis Results
Hught Slip Property
Superior, Wisconsin**

Parameter	Soil Sample Number Sampling Location Concentration in ppm			Wisconsin DNR Interim Soil Cleanup Guideline	Concentration Requiring Additional Analyses (TCLP)
	SS1 Site 1 adjacent to concrete pad	SS2 Site 2 north of concrete pad	SS3 Site 3 near vehicle turnaround		
Diesel Range Organics	10,300	45.1	456	100	--
Toluene	0.372	<	<	1.5	--
Xylenes	1.09	0.373	0.386	4.1	--
1,3,5-trimethylbenzene	0.990	<	<	--	--
1,2,4-trimethylbenzene	0.874	<	0.232	--	--
Lead	222	92.9	46.5	--	100
Chromium	16.1	65.1	9.05	--	100
Lead (TCLP analysis)	<	--	--	5.0	N/A

ppm = parts per million, equivalent to milligrams per kilogram, or mg/kg
 < = concentration below laboratory method detection limits
 -- = guideline not established/analysis not performed
 TCLP = toxicity characteristics leaching procedure

Kummes

APPLICATION TO TREAT OR DISPOSE OF PETROLEUM CONTAMINATED SOIL ASPHALT PLANT OR OTHER TYPE OF THERMAL TREATMENT UNIT

Form 4400-149

Received 11/27
from
Lakehead
Stack
R

This form is required by the Department of Natural Resources for leaking underground storage tank sites to ensure that petroleum contaminated soil is treated or disposed of in compliance with NR 500-540, NR 158, and NR 419, Wis. Adm. Code. Failure to comply with applicable statutes and administrative rules may lead to violations of subchapters III and IV of ch. 144 Wis. Stats. and may result in forfeitures of not less than \$10 or more than \$25,000 for each violation, pursuant to ss. 144.426(1), 144.74 (1), and 144.99, Wis. Stats., or fines of not less than \$100 or more than \$150,000 or imprisonment for not more than 10 years, or both, pursuant to s. 144.74 (2), Wis. Stats. Each day of a continuing violation constitutes a separate violation. Department approval of this form is required prior to site remediation, except for soils to be buried in landfills.

DIRECTIONS: 1) Complete parts I and II. 2) Submit the application to the DNR project manager for approval. 3) Have the treatment facility complete part III of the approved form after the soil has been treated. 4) Return the ORIGINAL form to the DNR project manager. 5) Keep a copy for your files.

ALL SITES MUST COMPLETE PART I

Part I. Source of Soil

Site/Facility Name Hughitt Slip Property Site ID. # (for DNR use only) _____

Site Address (no street address; see attached map) Contact Name Norman & Donna Camenker

City, State, Zip Code Superior, Wisconsin 54880 1/4, 1/4, Section, Township, and Range NE 1/4, SE 1/4 Sec. 10, T49N, R14W

The information on this form is accurate to the best of my knowledge.

Signature of Soil Generator [Signature] Telephone Number (include area code) (715) 392-5457

Consulting Firm Twin Ports Testing, Inc. Contact Jon Hinkel Telephone Number (218) 722-1911

Estimated Volume Contaminated Soil 18 Tons cubic yards (circle one) Soil Type (USCS)
 sand (SP, SW)
 silty/clayey sands (SM, SC)
 silt (ML, MH, OL)
 clay (CL, CH, OH)
 gravel (GC, GM, GP, GW)
 peat (PT)

} fill material mixture of soils

Type of Petroleum Contamination (Circle):

Gasoline Diesel Fuel/#2 Fuel Oil

Other Waste Oil

Distance to Nearest Residence/Business 800 ft.

Contaminant concentration:

One screened sample for each 15 yds³ and one laboratory analysis for each 300 yds³ of contaminated soil when the field instrument registers contamination OR one laboratory analysis for each 100 yds³ when the field instrument does not register contamination on soil shown to be contaminated during the site investigation/excavation or stockpiling. PLEASE ATTACH A TABLE LISTING RESULTS OF BOTH FIELD SCREENING AND LAB ANALYSES, AND INCLUDE SUPPORTING LAB REPORTS, IN ADDITION TO THE TPH AND BENZENE INFORMATION REQUESTED BELOW. NOTE: DILHR requires a minimum of 3 laboratory samples on excavated soil for PECFA claims.

Total Benzene in soil to be remediated (attach calculations) < 0.010 lbs

Total Petroleum Hydrocarbons (TPH) in soil to be remediated (attach calculations) 519 lbs

Total TPH as diesel range organics



728 GARFIELD AVENUE • DULUTH, MINNESOTA 55802
 MN (218) 722-1911 • FAX (218) 722-3295

A DIVISION OF TWIN PORTS TESTING, INC.

SERIAL NUMBER
 No 14301

LABORATORY REQUEST AND
 CHAIN OF CUSTODY RECORD

LAKE SUPERIOR LABORATORIES

Project Name Hughitt Slip Property No. _____ P.O.# _____

Client TPT Env. Dept. Report To Jon Hinkel

Address Duluth Office

Bill To 599-95E.RA

Phone _____ Fax _____

Sampler Signature R. J. Hinkel

Sampler (Print) R. J. Hinkel

Remarks

Sample No./Location	Date	Time	Matrix			Number Of Containers	Preservative	Analyses										LSL No.					
			Air	Liquid	Solid			VOC	Lead	PAH													
SSB-10	3-11-96	12:45 pm			✓	4		✓	✓	✓													1478
SSB-11	3-11-96	2:00 pm			✓	4		✓	✓	✓													1479
SSB-12	3-11-96	2:45 pm			✓	4		✓	✓	✓													1480
SSB-13	3-11-96	3:15 pm			✓	2				✓													1481
Relinquished By <u>R. J. Hinkel</u>	Date/Time <u>4:00 pm</u>	Date/Time <u>3-11-96</u>	Received By <u>[Signature]</u>				Relinquished By	Date/Time	Received By				Relinquished By	Date/Time	Received By								
Relinquished By	Date/Time	Date/Time	Received By				Relinquished By	Date/Time	Received By				Relinquished By	Date/Time	Received By								

Turnaround Time: 2 Week 2-5 Day _____ or 24 Hour Rush _____ (additional charge)

LABORATORY ANALYSIS REPORT

Client
 Twin Ports Testing
 Environmental Dept.
 728 Garfield Avenue
 Duluth, MN 55802

Chem. Lab ID: 1478-96LS
Project: Hughitt Slip Property
Project ID: 599-95E.RA

Collected By: R.J. Hinkel
Delivered By: R.J. Hinkel
Sample Type: Soil
Collected: 03/11/96
Received: 03/11/96
Analyzed: 03/11/96
Reported: 03/26/96

Sample Description
 SSB-10

Analysis EPA 8021

Dichlorodifluoromethane	<25 ug/kg	1,1,2,2-Tetrachloroethane	<25 ug/kg
Chloromethane	<25 ug/kg	1,2,3-Trichloropropane	<25 ug/kg
Vinyl Chloride	<25 ug/kg	n-Propylbenzene	<25 ug/kg
Bromomethane	<25 ug/kg	Bromobenzene	<25 ug/kg
Chloroethane	<25 ug/kg	1,3,5-Trimethylbenzene	<25 ug/kg
Trichlorofluoromethane	<25 ug/kg	2-Chlorotoluene	<25 ug/kg
1,1-Dichloroethene	<25 ug/kg	4-Chlorotoluene	<25 ug/kg
Methylene Chloride	<25 ug/kg	tert-Butylbenzene	<25 ug/kg
trans-1,2-Dichloroethene	<25 ug/kg	1,2,4-Trimethylbenzene	26 ug/kg
1,1-Dichloroethane	<25 ug/kg	sec-Butylbenzene	26 ug/kg
2,2-Dichloropropane	<25 ug/kg	p-Isopropyltoluene	<25 ug/kg
cis-1,2-Dichloroethene	<25 ug/kg	1,3-Dichlorobenzene	<25 ug/kg
Chloroform	<25 ug/kg	1,4-Dichlorobenzene	<25 ug/kg
Bromochloromethane	<25 ug/kg	n-Butylbenzene	49 ug/kg
1,1,1-Trichloroethane	<25 ug/kg	1,2-Dichlorobenzene	<25 ug/kg
1,1-Dichloropropene	<25 ug/kg	1,2-Dibromo-3-chloropropane	<25 ug/kg
Carbon Tetrachloride	<25 ug/kg	1,2,4-Trichlorobenzene	<25 ug/kg
Benzene	<5.0 ug/kg	Hexachlorobutadiene	<25 ug/kg
1,2-Dichloroethane	<25 ug/kg	Naphthalene	37 ug/kg
Trichloroethene	<25 ug/kg	1,2,3-Trichlorobenzene	35 ug/kg
1,2-Dichloropropane	<25 ug/kg	Lead	216000 ug/kg
Bromodichloromethane	<25 ug/kg	Moisture	31.50 %
Dibromomethane	<25 ug/kg		
Toluene	<25 ug/kg		
1,1,2-Trichloroethane	<25 ug/kg		
1,3-Dichloropropane	<25 ug/kg		
Tetrachloroethene	<25 ug/kg		
Dibromochloromethane	<25 ug/kg		
1,2-Dibromoethane	<25 ug/kg		
Chlorobenzene	<25 ug/kg		
Ethylbenzene	<25 ug/kg		
1,1,1,2-Tetrachloroethane	<25 ug/kg		
m- & p-Xylene	<50 ug/kg		
o-Xylene	<25 ug/kg		
Styrene	<25 ug/kg		
Isopropylbenzene	<25 ug/kg		
Bromoform	<25 ug/kg		

Remarks

Lead: date analyzed 03/22/96.

LABORATORY ANALYSIS REPORT

Client
Twin Ports Testing
Environmental Dept.
728 Garfield Avenue
Duluth, MN 55802

Chem. Lab ID: 1479-96LS
Project: Hughitt Slip Property
Project ID: 599-95E.RA

Sample Description
SSB-11

Collected By: R.J. Hinkel
Delivered By: R.J. Hinkel
Sample Type: Soil
Collected: 03/11/96
Received: 03/11/96
Analyzed: 03/11/96
Reported: 03/26/96

Analysis EPA 8021

Dichlorodifluoromethane	<25 ug/kg	1,1,2,2-Tetrachloroethane	<25 ug/kg
Chloromethane	<25 ug/kg	1,2,3-Trichloropropane	<25 ug/kg
Vinyl Chloride	<25 ug/kg	n-Propylbenzene	<25 ug/kg
Bromomethane	<25 ug/kg	Bromobenzene	<25 ug/kg
Chloroethane	<25 ug/kg	1,3,5-Trimethylbenzene	<25 ug/kg
Trichlorofluoromethane	<25 ug/kg	2-Chlorotoluene	<25 ug/kg
1,1-Dichloroethene	<25 ug/kg	4-Chlorotoluene	<25 ug/kg
Methylene Chloride	<25 ug/kg	tert-Butylbenzene	<25 ug/kg
trans-1,2-Dichloroethene	<25 ug/kg	1,2,4-Trimethylbenzene	<25 ug/kg
1,1-Dichloroethane	<25 ug/kg	sec-Butylbenzene	<25 ug/kg
2,2-Dichloropropane	<25 ug/kg	p-Isopropyltoluene	<25 ug/kg
cis-1,2-Dichloroethene	<25 ug/kg	1,3-Dichlorobenzene	<25 ug/kg
Chloroform	<25 ug/kg	1,4-Dichlorobenzene	<25 ug/kg
Bromochloromethane	<25 ug/kg	n-Butylbenzene	35 ug/kg
1,1,1-Trichloroethane	<25 ug/kg	1,2-Dichlorobenzene	<25 ug/kg
1,1-Dichloropropene	<25 ug/kg	1,2-Dibromo-3-chloropropane	<25 ug/kg
Carbon Tetrachloride	<25 ug/kg	1,2,4-Trichlorobenzene	40 ug/kg
Benzene	<5.0 ug/kg	Hexachlorobutadiene	<25 ug/kg
1,2-Dichloroethane	<25 ug/kg	Naphthalene	<25 ug/kg
Trichloroethene	<25 ug/kg	1,2,3-Trichlorobenzene	<25 ug/kg
1,2-Dichloropropane	<25 ug/kg	Lead	<5000 ug/kg
Bromodichloromethane	<25 ug/kg	Moisture	19.80 %
Dibromomethane	<25 ug/kg		
Toluene	<25 ug/kg		
1,1,2-Trichloroethane	<25 ug/kg		
1,3-Dichloropropane	<25 ug/kg		
Tetrachloroethene	<25 ug/kg		
Dibromochloromethane	<25 ug/kg		
1,2-Dibromoethane	<25 ug/kg		
Chlorobenzene	<25 ug/kg		
Ethylbenzene	<25 ug/kg		
1,1,1,2-Tetrachloroethane	<25 ug/kg		
m- & p-Xylene	<50 ug/kg		
o-Xylene	<25 ug/kg		
Styrene	<25 ug/kg		
Isopropylbenzene	<25 ug/kg		
Bromoform	<25 ug/kg		

Remarks

Lead: date analyzed 03/22/96.

LABORATORY ANALYSIS REPORT

Client
 Twin Ports Testing
 Environmental Dept.
 728 Garfield Avenue
 Duluth, MN 55802

Chem. Lab ID: 1480-96LS
Project: Hughitt Slip Property
Project ID: 599-95E.RA

Collected By: R.J. Hinkel
Delivered By: R.J. Hinkel
Sample Type: Soil
Collected: 03/11/96
Received: 03/11/96
Analyzed: 03/11/96
Reported: 03/26/96

Sample Description
 SSB-12

Analysis EPA 8021

Dichlorodifluoromethane	<25 ug/kg	1,1,2,2-Tetrachloroethane	<25 ug/kg
Chloromethane	<25 ug/kg	1,2,3-Trichloropropane	<25 ug/kg
Vinyl Chloride	<25 ug/kg	n-Propylbenzene	<25 ug/kg
Bromomethane	<25 ug/kg	Bromobenzene	<25 ug/kg
Chloroethane	<25 ug/kg	1,3,5-Trimethylbenzene	<25 ug/kg
Trichlorofluoromethane	<25 ug/kg	2-Chlorotoluene	<25 ug/kg
1,1-Dichloroethene	<25 ug/kg	4-Chlorotoluene	<25 ug/kg
Methylene Chloride	<25 ug/kg	tert-Butylbenzene	<25 ug/kg
trans-1,2-Dichloroethene	<25 ug/kg	1,2,4-Trimethylbenzene	<25 ug/kg
1,1-Dichloroethane	<25 ug/kg	sec-Butylbenzene	<25 ug/kg
2,2-Dichloropropane	<25 ug/kg	p-Isopropyltoluene	<25 ug/kg
cis-1,2-Dichloroethene	<25 ug/kg	1,3-Dichlorobenzene	<25 ug/kg
Chloroform	<25 ug/kg	1,4-Dichlorobenzene	<25 ug/kg
Bromochloromethane	<25 ug/kg	n-Butylbenzene	42 ug/kg
1,1,1-Trichloroethane	<25 ug/kg	1,2-Dichlorobenzene	<25 ug/kg
1,1-Dichloropropene	<25 ug/kg	1,2-Dibromo-3-chloropropane	<25 ug/kg
Carbon Tetrachloride	<25 ug/kg	1,2,4-Trichlorobenzene	48 ug/kg
Benzene	<5.0 ug/kg	Hexachlorocyclopentadiene	<25 ug/kg
1,2-Dichloroethane	<25 ug/kg	Naphthalene	26 ug/kg
Trichloroethene	<25 ug/kg	1,2,3-Trichlorobenzene	27 ug/kg
1,2-Dichloropropane	<25 ug/kg	Lead	78500 ug/kg
Bromodichloromethane	<25 ug/kg	Moisture	28.10 %
Dibromomethane	<25 ug/kg		
Toluene	<25 ug/kg		
1,1,2-Trichloroethane	<25 ug/kg		
1,3-Dichloropropane	<25 ug/kg		
Tetrachloroethene	<25 ug/kg		
Dibromochloromethane	<25 ug/kg		
1,2-Dibromoethane	<25 ug/kg		
Chlorobenzene	<25 ug/kg		
Ethylbenzene	<25 ug/kg		
1,1,1,2-Tetrachloroethane	<25 ug/kg		
m- & p-Xylene	<50 ug/kg		
o-Xylene	<25 ug/kg		
Styrene	<25 ug/kg		
Isopropylbenzene	<25 ug/kg		
Bromoform	<25 ug/kg		

Remarks

Lead: date analyzed 03/22/96.

LABORATORY ANALYSIS REPORT

Client
 Twin Ports Testing
 Environmental Dept.
 728 Garfield Avenue
 Duluth, MN 55802

Project: Hughitt Slip Property
Project ID: 599-95E.RA

Collected By: R.J. Hinkel
Delivered By: R.J. Hinkel

Chem. Lab ID	1478-96LS	1479-96LS	1480-96LS
Sample Type	Soil	Soil	Soil
Collected	03/11/96	03/11/96	03/11/96
Received	03/11/96	03/11/96	03/11/96
Reported	03/26/96	03/26/96	03/26/96
Sample Description	SSB-10	SSB-11	SSB-12

Analysis	Date Analyzed	RL	1478-96LS	1479-96LS	1480-96LS
Acenaphthene	03/19/96	5.70 ug/kg	ND	ND	ND
Acenaphthylene	03/19/96	1.20 ug/kg	ND	ND	ND
Anthracene	03/19/96	9.00 ug/kg	473 ug/kg	ND	93.0 ug/kg
Benzo[a]anthracene	03/19/96	4.00 ug/kg	708 ug/kg	ND	392 ug/kg
Benzo[a]pyrene	03/19/96	4.00 ug/kg	892 ug/kg	8.87 ug/kg	610 ug/kg
Benzo[b]fluoranthene	03/19/96	2.20 ug/kg	734 ug/kg	7.35 ug/kg	476 ug/kg
Benzo[k]fluoranthene	03/19/96	1.70 ug/kg	270 ug/kg	3.47 ug/kg	172 ug/kg
Benzo[g,h,i]perylene	03/19/96	4.50 ug/kg	ND	ND	302 ug/kg
Chrysene	03/19/96	1.70 ug/kg	ND	ND	508 ug/kg
Dibenzo[a,h]anthracene	03/19/96	6.20 ug/kg	ND	ND	ND
Fluoranthene	03/19/96	6.20 ug/kg	2250 ug/kg	25.3 ug/kg	1530 ug/kg
Fluorene	03/19/96	3.40 ug/kg	255 ug/kg	ND	ND
Indeno[1,2,3-cd]pyrene	03/19/96	6.70 ug/kg	501 ug/kg	ND	353 ug/kg
1-Methyl Naphthalene	03/19/96	1.20 ug/kg	191 ug/kg	9.50 ug/kg	ND
2-Methyl Naphthalene	03/19/96	3.40 ug/kg	ND	ND	ND
Naphthalene	03/19/96	1.70 ug/kg	401 ug/kg	5.17 ug/kg	60.9 ug/kg
Phenanthrene	03/19/96	6.70 ug/kg	1890 ug/kg	28.5 ug/kg	275 ug/kg
Pyrene	03/19/96	5.00 ug/kg	2400 ug/kg	ND	964 ug/kg

Remarks

RL ⇒ Reporting Limit
 ND ⇒ Not Detected at or above RL

LABORATORY ANALYSIS REPORT

Client
 Twin Ports Testing
 Environmental Dept.
 728 Garfield Avenue
 Duluth, MN 55802

Project: Hughitt Slip Property
Project ID: 599-95E.RA

Collected By: R.J. Hinkel
Delivered By: R.J. Hinkel

Chem. Lab ID	1481-96LS		
Sample Type	Soil		
Collected	03/11/96		
Received	03/11/96		
Reported	03/26/96		
Sample Description	SSB-13		

Analysis	Date Analyzed	RL			
Acenaphthene	03/19/96	5.70 ug/kg	ND		
Acenaphthylene	03/19/96	1.20 ug/kg	ND		
Anthracene	03/19/96	9.00 ug/kg	ND		
Benzo[a]anthracene	03/19/96	4.00 ug/kg	8.29 ug/kg		
Benzo[a]pyrene	03/19/96	4.00 ug/kg	16.3 ug/kg		
Benzo[b]fluoranthene	03/19/96	2.20 ug/kg	14.5 ug/kg		
Benzo[k]fluoranthene	03/19/96	1.70 ug/kg	6.96 ug/kg		
Benzo[g,h,i]perylene	03/19/96	4.50 ug/kg	4.29 ug/kg		
Chrysene	03/19/96	1.70 ug/kg	ND		
Dibenzo[a,h]anthracene	03/19/96	6.20 ug/kg	ND		
Fluoranthene	03/19/96	6.20 ug/kg	46.7 ug/kg		
Fluorene	03/19/96	3.40 ug/kg	ND		
Indeno[1,2,3-cd]pyrene	03/19/96	6.70 ug/kg	7.10 ug/kg		
1-Methyl Naphthalene	03/19/96	1.20 ug/kg	16.3 ug/kg		
2-Methyl Naphthalene	03/19/96	3.40 ug/kg	ND		
Naphthalene	03/19/96	1.70 ug/kg	9.50 ug/kg		
Phenanthrene	03/19/96	6.70 ug/kg	40.6 ug/kg		
Pyrene	03/19/96	5.00 ug/kg	ND		

Remarks

RL ⇒ Reporting Limit
 ND ⇒ Not Detected at or above RL



728 GARFIELD AVENUE • DULUTH, MINNESOTA 55802
 MN (218) 722-1911 • FAX (218) 722-3295

SERIAL NUMBER
 No 13869

A DIVISION OF TWIN PORTS TESTING, INC.

LABORATORY REQUEST AND
 CHAIN OF CUSTODY RECORD

LAKE SUPERIOR LABORATORIES

Project Name Hughitt Slip Property No. _____ P.O.# _____
 Client TPT Env. Dept. Report To Jon Hinkel
 Address 728 Garfield Ave.
Duluth — Bill To 599-95E-RA
 Phone _____ Fax _____

Remarks • Wisconsin Job
 • Report PVOCS in ppb units

Sampler Signature R J Hinkel
 Sampler (Print) R. J. Hinkel

Sample No./Location	Date	Time	Matrix			Number Of Containers	Preservative	Analyses					LSL No.		
			Air	Liquid	Solid			DRO	PVOC	Lead	PAH # 8310				
SSB-1	1/19/96	1:12 pm			✓			✓	✓	✓					1160
SSB-2	1/19/96	1:20 pm			✓			✓	✓	✓					1161
SSB-3	1/19/96	1:40 pm			✓			✓	✓	✓					1162
SSB-4	1/19/96	2:05 pm			✓			✗	✗	✗					1163
SSB-5	1/19/96	2:15 pm			✓			✗	✗	✗					1164
SSB-6	1/19/96	2:45 pm			✓			✗	✗	✗					1165
SSB-7	1/19/96	2:55 pm			✓			✓	✓	✓					1166
SSB-8	1/19/96	3:06 pm			✓			✗	✗	✗					1167
SSB-9	1/19/96	3:20 pm			✓			✗	✗	✗					1168

4
 RJH

Relinquished By R J Hinkel Date/Time 1/19/96 3:55 pm Received By [Signature] Date/Time 1/19/96
 Relinquished By _____ Date/Time _____ Received By _____ Date/Time _____

Turnaround Time: 2 Week 2-5 Day _____ or 24 Hour Rush _____ (additional charge)



728 GARFIELD AVENUE • DULUTH, MINNESOTA 55802
MN (218) 722-1911 • FAX (218) 722-3295

A DIVISION OF TWIN PORTS TESTING, INC.

SERIAL NUMBER
No 13871

LABORATORY REQUEST AND
CHAIN OF CUSTODY RECORD

LAKE SUPERIOR LABORATORIES

Project Name Hughitt Slip Property No. _____ P.O.# _____
Client TPT Env. Dept. Report To Jon Hinkel
Address 728 Garfield Ave.
Duluth - Bill To 599-95E.RA
Phone _____ Fax _____

Remarks • Resampling of 1/19/96 event
• Wisconsin site
• Report PVOCS in ppb (Low Level detection)

Sampler Signature R. J. Hinkel
Sampler (Print) R. J. Hinkel

Sample No./Location	Date	Time	Matrix			Number Of Containers	Preservative	Analyses				LSL No.		
			Air	Liquid	Solid			DRO	PVOC	Lead	PAH # 8310			
SSB-4	1/22/96	2:33 pm			✓	3		✓	✓	✓				1176
SSB-5	1/22/96	3:10 pm			✓	3		✓	✓	✓				1177
SSB-6	1/22/96	3:25 pm			✓	4		✓	✓	✓	✓			1178
SSB-8	1/22/96	3:37 pm			✓	3		✓	✓	✓				1179
SSB-9	1/22/96	4:00 pm			✓	4		✓	✓	✓	✓			1180
Relinquished By <u>R. J. Hinkel</u>	Date/Time <u>1/23/96</u>	Received By <u>[Signature]</u>	Date/Time <u>8:24am</u>	Received By <u>[Signature]</u>	Relinquished By	Date/Time	Received By	Relinquished By	Date/Time	Received By				
Relinquished By	Date/Time	Received By	Date/Time	Received By	Relinquished By	Date/Time	Received By	Relinquished By	Date/Time	Received By				

Turnaround Time: 2 Week 2-5 Day _____ or 24 Hour Rush _____ (additional charge)

LABORATORY ANALYSIS REPORT

Client
 Twin Ports Testing
 Environmental Dept.
 728 Garfield Avenue
 Duluth, MN 55802

Project: Hughitt Slip Property
Project ID: 599-95E.RA

Collected By: R.J. Hinkel
Delivered By: R.J. Hinkel

Chem. Lab ID	1160-96LS	1161-96LS	1162-96LS
Sample Type	Soil	Soil	Soil
Collected	01/19/96	01/19/96	01/19/96
Received	01/19/96	01/19/96	01/19/96
Reported	02/15/96	02/15/96	02/15/96
Sample Description	SSB-1	SSB-2	SSB-3

Analysis	Date Analyzed	MDL	1160-96LS	1161-96LS	1162-96LS
Lead	01/26/96	5.00 mg/kg	14.6 mg/kg	ND	ND
MTBE	01/30/96	25 ug/kg	98 ug/kg	ND	ND
Benzene	01/30/96	5.0 ug/kg	27 ug/kg	ND	ND
Toluene	01/30/96	25 ug/kg	77 ug/kg	ND	ND
Ethylbenzene	01/30/96	25 ug/kg	ND	ND	ND
Xylenes, Total	01/30/96	75 ug/kg	ND	ND	ND
1,3,5-Trimethylbenzene	01/30/96	25 ug/kg	ND	ND	ND
1,2,4-Trimethylbenzene	01/30/96	25 ug/kg	ND	ND	ND
Moisture	01/30/96	1.00 %	23.2 %	17.6 %	19.1 %
Diesel Range Organics	02/01/96	0.100 mg/l	ND	ND	ND

Remarks

MDL ⇒ Method Detection Limit
 ND ⇒ Not Detected at or above MDL

LABORATORY ANALYSIS REPORT

Client
 Twin Ports Testing
 Environmental Dept.
 728 Garfield Avenue
 Duluth, MN 55802

Project: Hughitt Slip Property
Project ID: 599-95E.RA

Collected By: R.J. Hinkel
Delivered By: R.J. Hinkel

Chem. Lab ID	1176-96LS	1177-96LS	1178-96LS
Sample Type	Soil	Soil	Soil
Collected	01/22/96	01/22/96	01/22/96
Received	01/23/96	01/23/96	01/23/96
Reported	02/15/96	02/15/96	02/15/96
Sample Description	SSB-4	SSB-5	SSB-6

Analysis	Date Analyzed	MDL	1176-96LS	1177-96LS	1178-96LS
MTBE	01/30/96	25 ug/kg	ND	ND	ND
Benzene	01/30/96	5.0 ug/kg	57 ug/kg	50 ug/kg	50 ug/kg
Toluene	01/30/96	25 ug/kg	94 ug/kg	81 ug/kg	84 ug/kg
Ethylbenzene	01/30/96	25 ug/kg	50 ug/kg	52 ug/kg	53 ug/kg
Xylenes, Total	01/30/96	75 ug/kg	160 ug/kg	190 ug/kg	180 ug/kg
1,3,5-Trimethylbenzene	01/30/96	25 ug/kg	36 ug/kg	47 ug/kg	43 ug/kg
1,2,4-Trimethylbenzene	01/30/96	25 ug/kg	52 ug/kg	64 ug/kg	59 ug/kg
Lead	01/26/96	5.00 mg/kg	256 mg/kg	315 mg/kg	117 mg/kg
Moisture	01/30/96	1.00 %	20.9 %	35.0 %	29.9 %
Diesel Range Organics	02/02/96	5.00 mg/kg	61.5 mg/kg	29.2 mg/kg	22.3 mg/kg

Remarks

MDL ⇒ Method Detection Limit
 ND ⇒ Not Detected at or above MDL

LABORATORY ANALYSIS REPORT

Client

Twin Ports Testing
 Environmental Dept.
 728 Garfield Avenue
 Duluth, MN 55802

Project: Hughitt Slip Property
Project ID: 599-95E.RA

Collected By: R.J. Hinkel
Delivered By: R.J. Hinkel

Chem. Lab ID	1166-96LS		
Sample Type	Soil		
Collected	01/19/96		
Received	01/19/96		
Reported	02/15/96		
Sample Description	SSB-7		

Analysis	Date Analyzed	MDL			
Lead	01/26/96	5.00 mg/kg	98.3 mg/kg		
MTBE	01/30/96	25 ug/kg	ND		
Benzene	01/30/96	5.0 ug/kg	ND		
Toluene	01/30/96	25 ug/kg	ND		
Ethylbenzene	01/30/96	25 ug/kg	ND		
Xylenes, Total	01/30/96	75 ug/kg	ND		
1,3,5-Trimethylbenzene	01/30/96	25 ug/kg	ND		
1,2,4-Trimethylbenzene	01/30/96	25 ug/kg	ND		
Moisture	01/30/96	1.00 %	28.9 %		
Diesel Range Organics	02/01/96	0.100 mg/l	ND		

Remarks

MDL ⇒ Method Detection Limit
 ND ⇒ Not Detected at or above MDL

LABORATORY ANALYSIS REPORT

Client
 Twin Ports Testing
 Environmental Dept.
 728 Garfield Avenue
 Duluth, MN 55802

Project: Hughitt Slip Property
Project ID: 599-95E.RA

Collected By: R.J. Hinkel
Delivered By: R.J. Hinkel

Chem. Lab ID	1179-96LS	1180-96LS	
Sample Type	Soil	Soil	
Collected	01/22/96	01/22/96	
Received	01/23/96	01/23/96	
Reported	02/15/96	02/15/96	
Sample Description	SSB-8	SSB-9	

Analysis	Date Analyzed	MDL			
MTBE	01/30/96	25 ug/kg	ND	ND	
Benzene	01/30/96	5.0 ug/kg	ND	ND	
Toluene	01/30/96	25 ug/kg	49 ug/kg	60 ug/kg	
Ethylbenzene	01/30/96	25 ug/kg	44 ug/kg	58 ug/kg	
Xylenes, Total	01/30/96	75 ug/kg	140 ug/kg	180 ug/kg	
1,3,5-Trimethylbenzene	01/30/96	25 ug/kg	39 ug/kg	53 ug/kg	
1,2,4-Trimethylbenzene	01/30/96	25 ug/kg	51 ug/kg	61 ug/kg	
Lead	01/26/96	5.00 mg/kg	115 mg/kg	321 mg/kg	
Moisture	01/30/96	1.00 %	27.2 %	53.9 %	
Diesel Range Organics	02/02/96	5.00 mg/kg	ND α	71.1 mg/kg	

Remarks

MDL \Rightarrow Method Detection Limit
 ND \Rightarrow Not Detected at or above MDL

 α \Rightarrow Analyzed On 02/01/96

Client
 Twin Ports Testing
 Environmental Dept.
 728 Garfield Avenue
 Duluth, MN 55802

Project: Hughitt Slip Property
Project ID: 599-95E.RA

Collected By: R.J. Hinkel
Delivered By: R.J. Hinkel

Chem. Lab ID	1162-96LS		
Sample Type	Soil		
Collected	01/19/96		
Received	01/19/96		
Reported	02/15/96		
Sample Description	SSB-3		

Analysis	Date Analyzed	MDL			
Naphthalene	02/13/96	160 ug/kg	ND		
Acenaphthylene	02/13/96	240 ug/kg	ND		
Acenaphthene	02/13/96	80.0 ug/kg	ND		
Fluorene	02/13/96	80.0 ug/kg	ND		
Phenanthrene	02/13/96	12.0 ug/kg	18.6 ug/kg		
Anthracene	02/13/96	3.60 ug/kg	ND		
Fluoranthene	02/13/96	12.0 ug/kg	51.2 ug/kg		
Pyrene	02/13/96	20.0 ug/kg	60.5 ug/kg		
Benzo[a]anthracene	02/13/96	2.80 ug/kg	26.0 ug/kg		
Chrysene	02/13/96	2.80 ug/kg	36.3 ug/kg		
Benzo[b]fluoranthene	02/13/96	2.40 ug/kg	19.5 ug/kg		
Benzo[k]fluoranthene	02/13/96	2.40 ug/kg	11.6 ug/kg		
Benzo[a]pyrene	02/13/96	3.20 ug/kg	23.7 ug/kg		
Dibenzo[a,h]anthracene	02/13/96	20.0 ug/kg	<40.0 ug/kg		
Benzo[g,h,i]perylene	02/13/96	32.0 ug/kg	<64.0 ug/kg		
Indeno[1,2,3-cd]pyrene	02/13/96	8.00 ug/kg	<16.0 ug/kg		

Remarks

1162-96LS Elevated detection limit due to sample concentration.

MDL ⇒ Method Detection Limit
 ND ⇒ Not Detected at or above MDL

LABORATORY ANALYSIS REPORT

Client
 Twin Ports Testing
 Environmental Dept.
 728 Garfield Avenue
 Duluth, MN 55802

Project: Hughitt Slip Property
Project ID: 599-95E.RA

Collected By: R.J. Hinkel
Delivered By: R.J. Hinkel

Chem. Lab ID	1178-96LS	1180-96LS	
Sample Type	Soil	Soil	
Collected	01/22/96	01/22/96	
Received	01/23/96	01/23/96	
Reported	02/15/96	02/15/96	
Sample Description	SSB-6	SSB-9	

Analysis	Date Analyzed	MDL		
Naphthalene	02/14/96	160 ug/kg	ND	ND
Acenaphthylene	02/14/96	240 ug/kg	ND	ND
Acenaphthene	02/14/96	80.0 ug/kg	419 ug/kg	859 ug/kg
Fluorene	02/14/96	80.0 ug/kg	ND	ND
Phenanthrene	02/14/96	12.0 ug/kg	223 ug/kg	713 ug/kg
Anthracene	02/14/96	3.60 ug/kg	32.4 ug/kg	80.7 ug/kg
Fluoranthene	02/14/96	12.0 ug/kg	447 ug/kg	1120 ug/kg
Pyrene	02/14/96	20.0 ug/kg	503 ug/kg	1290 ug/kg
Benzo[a]anthracene	02/14/96	2.80 ug/kg	156 ug/kg	421 ug/kg
Chrysene	02/14/96	2.80 ug/kg	235 ug/kg	618 ug/kg
Benzo[b]fluoranthene	02/14/96	2.40 ug/kg	117 ug/kg	249 ug/kg
Benzo[k]fluoranthene	02/14/96	2.40 ug/kg	61.4 ug/kg	146 ug/kg
Benzo[a]pyrene	02/14/96	3.20 ug/kg	134 ug/kg	387 ug/kg
Dibenzo[a,h]anthracene	02/14/96	20.0 ug/kg	<200 ug/kg	<400 ug/kg
Benzo[g,h,i]perylene	02/14/96	32.0 ug/kg	<320 ug/kg	<640 ug/kg
Indeno[1,2,3-cd]pyrene	02/14/96	8.00 ug/kg	<80.0 ug/kg	<160 ug/kg

Remarks

WI DNR Laboratory Certification #999446800

1178-96LS Elevated detection limit due to sample concentration.

1180-96LS Elevated detection limit due to sample concentration.

MDL ⇒ Method Detection Limit

ND ⇒ Not Detected at or above MDL



728 GARFIELD AVENUE • DULUTH, MINNESOTA 55802
MN (218) 722-1911 • FAX (218) 722-3295

A DIVISION OF TWIN PORTS TESTING, INC.

SERIAL NUMBER
No 13866

LABORATORY REQUEST AND
CHAIN OF CUSTODY RECORD

LAKE SUPERIOR LABORATORIES

Project Name Hughitt Slip Property No. _____ P.O.# _____
Client TPT Env. Dept Report To Jon Hinkel
Address 728 Garfield Ave
Duluth — Bill To 599-95E.RA
Phone _____ Fax _____

Remarks *Please report in detection limits as follows:
100 ppm — GRO; DRO
3 ppm — BTEX parameters
1 ppm — lead*

Sampler Signature R. J. Hinkel
Sampler (Print) R. J. Hinkel

Sample No./Location	Date	Time	Matrix			Number Of Containers	Preservative	Analyses				LSL No.	
			Air	Liquid	Solid			GRO	DRO	BTEX	Lead		
WS-1	1/17/96	4:35 pm		✓		5		✓	✓	✓	✓		1169
Relinquished By <u>R. J. Hinkel</u>	Date/Time <u>1/19/96 9:25 am</u>	Received By <u>[Signature]</u>	Date/Time <u>1/17/96</u>	Relinquished By	Date/Time	Received By							
Relinquished By	Date/Time	Received By	Date/Time	Relinquished By	Date/Time	Received By							

Turnaround Time: 2 Week _____ 2-5 Day or 24 Hour Rush (additional charge)

LABORATORY ANALYSIS REPORT

Client
 Twin Ports Testing
 Environmental Dept.
 728 Garfield Avenue
 Duluth, MN 55802

Project: Hughitt Slip Property
Project ID: 599-95E.RA

Collected By: R.J. Hinkel
Delivered By: R.J. Hinkel

Chem. Lab ID	1169-96LS		
Sample Type	Water		
Collected	01/17/96		
Received	01/19/96		
Reported	01/30/96		
Sample Description	WS-1		

Analysis	Date Analyzed	MDL			
Diesel Range Organics	01/24/96	0.100 mg/l	0.492 mg/l		
Gasoline Range Organics	01/30/96	0.100 mg/l	ND		
Benzene	01/30/96	0.005 mg/l	ND		
Toluene	01/30/96	0.005 mg/l	ND		
Ethylbenzene	01/30/96	0.005 mg/l	ND		
Xylenes, Total	01/30/96	0.015 mg/l	ND		
Lead	01/20/96	0.400 mg/l	ND		

Remarks

DRO: Duplicate diesel component spike recovery = 119.3%. Method blank recovery = 0.135mg/l.

MDL ⇒ Method Detection Limit
 ND ⇒ Not Detected at or above MDL

LABORATORY ANALYSIS REPORT

Client
 Twin Ports Testing
 Environmental Dept.
 728 Garfield Avenue
 Duluth, MN 55802

Chem. Lab ID: 2161-96LS
Project: Hughitt Slip Property
Project ID: 599-95E.RA

Collected By: R.J. Hinkel
Delivered By: R.J. Hinkel
Sample Type: Water
Collected: 05/30/96
Received: 05/31/96
Analyzed: 06/06/96
Reported: 06/24/96

Sample Description
 WS-2

Analysis EPA 8021

Dichlorodifluoromethane	<1.0 ug/l	1,1,2,2-Tetrachloroethane	<1.0 ug/l
Chloromethane	<1.0 ug/l	1,2,3-Trichloropropane	<1.0 ug/l
Vinyl Chloride	<1.0 ug/l	n-Propylbenzene	<1.0 ug/l
Bromomethane	<1.0 ug/l	Bromobenzene	<1.0 ug/l
Chloroethane	<1.0 ug/l	1,3,5-Trimethylbenzene	<1.0 ug/l
Trichlorofluoromethane	<1.0 ug/l	2-Chlorotoluene	<1.0 ug/l
1,1-Dichloroethene	<1.0 ug/l	4-Chlorotoluene	<1.0 ug/l
Methylene Chloride	<1.0 ug/l	tert-Butylbenzene	<1.0 ug/l
trans-1,2-Dichloroethene	<1.0 ug/l	1,2,4-Trimethylbenzene	<1.0 ug/l
1,1-Dichloroethane	<1.0 ug/l	sec-Butylbenzene	<1.0 ug/l
2,2-Dichloropropane	<1.0 ug/l	p-Isopropyltoluene	<1.0 ug/l
cis-1,2-Dichloroethene	<1.0 ug/l	1,3-Dichlorobenzene	<1.0 ug/l
Chloroform	<1.0 ug/l	1,4-Dichlorobenzene	<1.0 ug/l
Bromochloromethane	<1.0 ug/l	n-Butylbenzene	1.4 ug/l
1,1,1-Trichloroethane	<1.0 ug/l	1,2-Dichlorobenzene	<1.0 ug/l
1,1-Dichloropropene	<1.0 ug/l	1,2-Dibromo-3-chloropropane	<1.0 ug/l
Carbon Tetrachloride	<1.0 ug/l	1,2,4-Trichlorobenzene	<1.0 ug/l
Benzene	<1.0 ug/l	Hexachlorobutadiene	<1.0 ug/l
1,2-Dichloroethane	<1.0 ug/l	Naphthalene	3.0 ug/l
Trichloroethene	<1.0 ug/l	1,2,3-Trichlorobenzene	<1.0 ug/l
1,2-Dichloropropane	<1.0 ug/l	Diesel Range Organics	113 ug/l
Bromodichloromethane	<1.0 ug/l	Lead	11.1 ug/l
Dibromomethane	<1.0 ug/l		
Toluene	<1.0 ug/l		
1,1,2-Trichloroethane	<1.0 ug/l		
1,3-Dichloropropane	<1.0 ug/l		
Tetrachloroethene	<1.0 ug/l		
Dibromochloromethane	<1.0 ug/l		
1,2-Dibromoethane	<1.0 ug/l		
Chlorobenzene	<1.0 ug/l		
Ethylbenzene	<1.0 ug/l		
1,1,1,2-Tetrachloroethane	<1.0 ug/l		
m- & p-Xylene	<2.0 ug/l		
o-Xylene	<1.0 ug/l		
Styrene	<1.0 ug/l		
Isopropylbenzene	<1.0 ug/l		
Bromoform	<1.0 ug/l		

Remarks

DRO: date analyzed 06/13/96.

Lead: date analyzed 06/24/96. Method blank contained 7.56ug/l Pb. Spike recovery = 120.7%.

LABORATORY ANALYSIS REPORT

Client
 Twin Ports Testing
 Environmental Dept.
 728 Garfield Avenue
 Duluth, MN 55802

Project: Hughitt Slip Property
Project ID: 599-95E.RA

Collected By: R.J. Hinkel
Delivered By: R.J. Hinkel

Chem. Lab ID	2161-96LS		
Sample Type	Water		
Collected	05/30/96		
Received	05/31/96		
Reported	06/24/96		
Sample Description	WS-2		

Analysis	Date Analyzed	RL	
Acenaphthene	06/06/96	0.20 ug/l	ND
Acenaphthylene	06/06/96	0.040 ug/l	ND
Anthracene	06/06/96	0.32 ug/l	ND
Benzo(a)anthracene	06/06/96	0.14 ug/l	ND
Benzo(a)pyrene	06/06/96	0.14 ug/l	ND
Benzo(b)fluoranthene	06/06/96	0.080 ug/l	ND
Benzo(k)fluoranthene	06/06/96	0.060 ug/l	ND
Benzo(g,h,i)perylene	06/06/96	0.16 ug/l	ND
Chrysene	06/06/96	0.060 ug/l	ND
Dibenzo(a,h)anthracene	06/06/96	0.22 ug/l	ND
Fluoranthene	06/06/96	0.22 ug/l	ND
Fluorene	06/06/96	0.12 ug/l	ND
Indeno(1,2,3,c,d)pyrene	06/06/96	0.24 ug/l	ND
1-Methyl Naphthalene	06/06/96	0.040 ug/l	ND
2-Methyl Naphthalene	06/06/96	0.12 ug/l	ND
Naphthalene	06/06/96	0.060 ug/l	ND
Phenanthrene	06/06/96	0.24 ug/l	ND
Pyrene	06/06/96	0.18 ug/l	ND

Remarks

RL ⇒ Reporting Limit
 ND ⇒ Not Detected at or above RL

ATTACH EMISSIONS CALCULATIONS

(a/1,000,000) x (2,800 lbs/yd³) x b = benzene emission in lbs., where a = benzene concentration of soil sample in ppm or mg/kg dry weight basis, and b = amount of contaminated soil in yds³. NOTE: This calculation can also be used to estimate TPH emissions by substituting TPH concentration (ppm or mg/kg) for "a". It may also be used to calculate VOCs.

Part II: Proposed Treatment Facility

Name of Plant Lakehead Blacktop & Mtls.

Plant number and Model Madson 4000 lb. Plan ^{Batch}

Contact Mr. Joe Kimmes

DNR Facility ID. No. 816037640

Address 6327 Tower Ave.
(or location of portable plant) Superior, WI 54880

Distance to Nearest Residence/Business 5000 ft.

LEAVE BLANK - DEPARTMENT OF NATURAL RESOURCES USE ONLY

Application Concurrence:

Air Management Phyllis Holmbeck Date 9/22/95

Project Manager _____ Date _____

Comments:

THIS SECTION TO BE COMPLETED BY THE ASPHALT/THERMAL UNIT PROCESSING THE CONTAMINATED SOIL AFTER PROCESSING IS COMPLETED

Part III

WDNR Air Pollution Control Permit Number _____

Actual Volume of Soil Treated (tons/cubic yards) 16 yds

Date of transport to plant September 26, 1995

Date of treatment NOVEMBER 8, 1995

Transporter Name Earth Movers of Duluth

Transporter License Number N/A

Circle One: Roasted and Incorporated Roasted Only

Total Benzene emissions in pounds for this batch (apply 99.90 Factor w/afterburner 50% destruction factor if no after burner is used) 0.0001 lbs

Benzene emissions to date for this plant (including this batch) for this calendar year 2.4487 lbs

Signature of Treatment plant representative

Telephone Number at Plant 715-392-1959

Robert E. Pittman

POST BURN SAMPLE RESULTS: COMPLETE ONLY FOR SOILS NOT INCORPORATED!

(One representative sample for each 100 cubic yards-not composites)

Sample Number _____

TPH _____

DNR APPROVAL IS REQUIRED BEFORE USING AS COMMON FILL

Date of backfilling or use as common fill _____ Location of fill site 1/4 1/4 S T R

TOTAL BENZENE CALCULATION:

$$\left(\frac{< 0.2 \text{ mg/kg}}{1,000,000} \right) \times \left(\frac{2,800 \text{ lbs.}}{1 \text{ cu yrd.}} \right) \times (18 \text{ cu yrds}) = < 0.010 \text{ lbs. benzene}$$

$$\frac{0.2}{1,000,000} \times 2,800 \times 18 \text{ yds} = 0.0090 \text{ lbs}$$

99% Factor w/attenuation = 0.0001 lbs

Dist. level

TOTAL PETROLEUM HYDROCARBONS CALCULATION:

$$\left(\frac{10,300 \text{ mg/kg}}{1,000,000} \right) \times \left(\frac{2,800 \text{ lbs.}}{1 \text{ cu yrd.}} \right) \times (18 \text{ cu yrds}) = 519 \text{ lbs. TPH}$$

Feed rate Calc.

98% dist.

$$\begin{aligned} \text{X tons/hr} &= \frac{(9 \text{ lb/hr}) \times (1.4 \text{ ton/yd}^3) \times 18 \text{ yd}^3}{519 \text{ lb DRO} \times (1 - 0.98)} \\ &= 21.85 \text{ yd}^3/\text{hr.} \end{aligned}$$

original delivered
to Phyllis Holmbeck
by RJH 1/4/95 4:30pm

State of Wisconsin
Department of Natural Resources

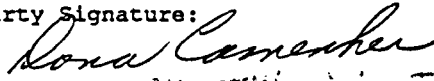
**NOTIFICATION TO TREAT OR DISPOSE OF
PETROLEUM CONTAMINATED SOIL & WATER**

Form 4400-120
Rev. 9-95

This form is required by the Department of Natural Resources (DNR) to ensure that the remediation of petroleum contaminated soil and water is in compliance with NR 500-540, NR 158, NR 419 and NR 445, Wis. Adm. Code. Failure to comply with applicable statutes and administrative rules may lead to violations of subchapters III and IV of Ch. 144, Wis. Stats. and may result in forfeitures of not less than \$10 or more than \$25,000 for each violation, pursuant to ss. 144.428(1), 144.74(1), 144.99, Wis. Stats., or fines of not less than \$100 or more than \$150,000 or imprisonment for not more than 10 years, or both, pursuant to s. 144.74(2), Wis. Stats. Each day of a continuing violation constitutes a separate violation. Except for the remediation of virgin petroleum spills, this form needs to be submitted to the DNR 10 business days prior to the commencement of the remediation.

DIRECTIONS: 1) Complete both sides of the form. 2) Have the responsible party sign the form. This signature certifies that the information on this form and in all supporting documents is accurate. 3) Submit the form with supporting documentation, lab reports and any maps to the appropriate District Air Management Program at least 10 business days prior to the commencement of remediation. 4) Submit a copy of this form to the DNR project manager and retain a copy for your records.

PART I - GENERAL INFORMATION

Site Name & Address: <i>Hughitt Slip Property Superior, Wisconsin (no street address - see attached maps)</i>	Date of Form Completion: <i>January 4, 1996</i>
Site #: <i>Excavation # 3 area (see Figure 3, attached)</i>	Do Other Remediation Systems Exist at This Site? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
County: <i>Douglas</i>	Site Type: <input type="checkbox"/> LUST <input type="checkbox"/> ERP <input type="checkbox"/> CERCLA <input type="checkbox"/> Other, Explain: <i>spill site - apparently waste oil</i>
Responsible Party Name & Address: <i>Norman & Donna Camenker 70 Highgate Court Superior, Wisconsin 54880</i>	Responsible Party Signature:  Telephone #: <i>394-5541 Arizona (715) 392-5457 (WI) (602) 855-4825 (Ariz.)</i>
Consulting Firm Name & Address: <i>Twin Ports Testing, Inc. 728 Garfield Avenue Duluth, Minnesota 55802</i>	Consulting Firm Contact: <i>Jon Hinkel, geologist</i> Telephone #: <i>(218) 722-1911</i>

PART II - SOIL AND WATER DATA (Attach Lab Reports and Calculations) *

Type of Contamination:		<input type="checkbox"/> Gasoline	<input type="checkbox"/> Diesel	<input type="checkbox"/> Fuel Oil	<input checked="" type="checkbox"/> Waste Oil
		<input type="checkbox"/> Chlorinated Organics	<input type="checkbox"/> Other: _____		
Soil Concentration:					
GRO:	_____ lb	_____ mg/kg/10 ⁶	x 2,800 lb/yd ³	x _____ yd ³	= _____ lb
DRO:	<u>2370</u> lb	<u>4240</u> mg/kg/10 ⁶	x 2,800 lb/yd ³	x <u>200</u> yd ³	= <u>2370</u> lb
Benzene:		<u><.025</u> mg/kg/10 ⁶	x 2,800 lb/yd ³	x <u>200</u> yd ³	= <u><.014</u> lb
Chlorinated Organics:	_____ lb	_____ mg/kg/10 ⁶	x 2,800 lb/yd ³	x _____ yd ³	= _____ lb
Other:	_____ lb	_____ mg/kg/10 ⁶	x 2,800 lb/yd ³	x _____ yd ³	= _____ lb
Water Concentration:					
GRO:	_____ mg/L	DRO:	_____ mg/L	Benzene:	_____ mg/L
Chlorinated Organics:	_____ mg/L	Other:	_____ mg/L		

PART III - TREATMENT OR DISPOSAL FACILITY INFORMATION

Treatment/Disposal Facility Name & Address: Jackson County Landfill, Inc. Route 3, Box 95B Black River Falls, WI 54615	Facility ID: <u>02004</u>
	Air Pollution Control Permit #: <u>Not necessary</u>
Facility Contact: <u>Alina Limberg</u>	Facility Located in 10-county Area in Southeast Wisconsin: <u>No</u>
Telephone #: <u>(715) 284-2262</u>	Distance to Nearest Residence or Business: <u>1 1/2 miles</u>
Headquarter Address: <u>Same as above.</u>	Portable Sources Only: Has a Portable Source Relocation Notification (Form 4500-25) Been Submitted for this Location: <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO N/A

* Please note: the concentrations provided for DRO and Benzene are maximum readings; the bulk of our sample analyses results are much lower concentrations.

PART III - SOIL VACUUM EXTRACTION OR GROUNDWATER REMEDIATION

Site Contact & Telephone #:	<u>Proposed Operations (Attach Calculations)</u> Anticipated Start-Up Date:
Is Site Located in the 10-county Area in	Estimated Project Duration:
Distance to Nearest	# of Wells:
<u>Pilot Test/Soil Venting Only</u> (Attach Lab Reports and Calculations) Date of Test: Flow Rate (scfm): - Not Applicable - Total Withdrawal of Air (scf): Total VOC Emission Rate (lb/hr): Benzene Emission Rate (lb/hr):	# of Emission Points: Stack Height: - Not Applicable - Maximum Equipment Flow Rate (scfm or gpm): Total VOC Emission Rate (lb/hr): Benzene Emission Rate (lb/hr): Benzene Emission Rate (lb/yr):

PART III - OTHER REMEDIATION METHODS

Proposing Other Remediation Method: YES Method Name: _____

Attach a project description for other remediation methods including landspreading, passive aeration and bioremediation. At a minimum, the information submitted should include the following items (with any supporting lab reports and calculations):

- ✓ Address/Location of Remediation Site - Indicate if this location is in the 10-county area in Southeast Wisconsin and the distance to the nearest residence or business. Include a map or site plan if appropriate.
- ✓ Description of Remediation Method
- ✓ Project Contact & Telephone #
- ✓ Anticipated Start-Up and Estimated Project Duration
- ✓ Highest Estimated Hourly VOC Emissions
- ✓ Highest Estimated Hourly and Annual Benzene Emissions
- ✓ Emission Testing Methodology
- ✓ Final Destination of Soil

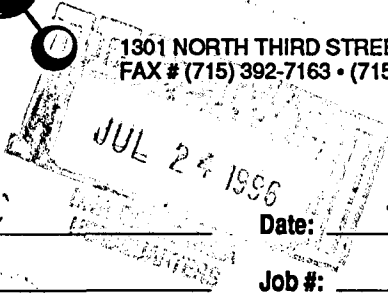
- Not Applicable -

TRANSMITTAL

SINCE 1972

TWIN PORTS TESTING, inc.

1301 NORTH THIRD STREET • SUPERIOR, WISCONSIN 54880
 FAX # (715) 392-7163 • (715) 392-7114



To: Chris Saari Date: July 24th 1996
Wisconsin DNR Job #: 579-95E.RA
Brule WI office Client: Norman & Dona Camenker
 Project: Hughitt slip site.

We are sending you: Enclosed Airmail Shop Drawings
 Separate Cover 1st Class Other Drawings
 By our Messenger Other Specifications
 By your Messenger Other

# OF COPIES	REPORT/PROPOSAL ID	LATEST DATE	DESCRIPTION OR REMARKS
①	RI/RA Report		
④	Case Summary & Close-out form		

THESE ARE TRANSMITTED as checked below:

For approval As requested No Exception Taken Revise & resubmit
 For your use For review & comment Make corrections noted Submit specified item

Remarks: Dear Chris,
If you have any questions, please call me.

Thank you

COPIES TO: Norman & Dona Encl. _____ Trans. _____
Camenker _____

Sincerely,
Jon Hinkel
(218) 722-1911

REMEDIAL INVESTIGATION AND REMEDIAL ACTION PROJECT

HUGHITT SLIP PROPERTY

SUPERIOR, WISCONSIN

JULY, 1996 TPT #599-95E.RA

**Norman and Dona Camanker
70 Highgate Road
Superior, WI 54880**

TABLE OF CONTENTS

I.	INTRODUCTION	1
II.	BACKGROUND INFORMATION	1
	Property Location	1
	Local/Regional Geology	1
	Previous Investigations	2
III.	FIELD INVESTIGATION AND REMEDIAL ACTION	2
	Survey of Potential Receptors	2
	Methods/Preliminary Results	3
	Methods/Final Results	3
IV.	DISCUSSION AND CONCLUSIONS	5
V.	RECOMMENDATIONS	6
VI.	LIMITS OF INVESTIGATION AND REPORT	7

FIGURES

- Figure 1: Property Location: USGS Quadrangle
- Figure 2: Site Map
- Figure 3: Initial Site Excavations
- Figure 4: Final Excavations/Additional Test Borings

TABLES

- Table 1: Phase II Soil Analysis Results
- Table 2: Field Screening Results - Initial Excavations
- Table 3: Analysis Results - Initial Excavations
- Table 4: Field Screening Results - Final Excavations
- Table 5: Analysis Results - Final Excavations/Additional Test Borings
- Table 6: Groundwater Analysis Results

APPENDICES

- Appendix A: WGNHS Records Search Documentation
- Appendix B: DNR Soil Treatment Authorization Permit
- Appendix C: DNR Correspondence, 12/8/95
- Appendix D: TPT Proposal/Work Plan 95P-183E
- Appendix E: DNR Correspondence, 12/28/95
- Appendix F: DNR Soil Disposal Authorization Permit
- Appendix G: WLSSD Approval for Waste Water Acceptance
- Appendix H: DNR Correspondence, 2/23/96
- Appendix I: Hand Auger Boring Logs/Boring Abandonment Forms
- Appendix J: Laboratory Reports

**REMEDIAL INVESTIGATION AND REMEDIAL ACTION PROJECT
HUGHITT SLIP PROPERTY
SUPERIOR, WISCONSIN**

I. INTRODUCTION

A project of remedial investigation and remedial action was conducted by Twin Ports Testing, Inc. (TPT) from September, 1995 to May, 1996, on the Hughitt Slip property, located adjacent to and east of the Hughitt Slip in Superior, Wisconsin. The project followed from recommendations provided in a Phase I Environmental Property Assessment (TPT #539-95E.PI) conducted in August, 1995, and has involved the removal and disposal of approximately 146 cubic yards of petroleum contaminated soil from three apparent spill sites. The property is owned by Mr. Norman and Mrs. Dona Camenker of Superior, Wisconsin, who have assumed the responsibility for the property's investigation and clean-up.

II. BACKGROUND

PROPERTY LOCATION / SITE DESCRIPTION

The Hughitt Slip property is located in the NE $\frac{1}{4}$ of the SE $\frac{1}{4}$ of Section 10, Township 49N, Range 14W, of Douglas County, and is displayed on the Superior, Wisconsin USGS 7 $\frac{1}{2}$ ' Quadrangle (Figure 1). The property lies approximately 400 feet north of N. 1st Street, and may be accessed from a gravel road extending northward from N. 1st Street (Figure 2). The three sites of investigation and remedial action are located adjacent to and west of a concrete pad on the southern portion of the property (referred to as Site 1 in this report); approximately 36 feet north of the concrete pad (Site 2); and adjacent to and west of a vehicle turn-around area on the northern portion of the property (Site 3).

LOCAL / REGIONAL GEOLOGY

The three apparent petroleum release sites have been found to be underlain by various fill materials near the surface including coarse to fine grained sands, gravel, slag, coal, and ash-like material. Various underground structural members including railroad ties, large timbers, pilings and steel rods have been encountered in several locations. Native soils underlying the fill materials are believed to be lacustrine clays, reaching thicknesses of approximately 500 feet in the vicinity of the subject property. Groundwater appears to lie 1 $\frac{1}{2}$ to 2 $\frac{1}{2}$ feet beneath the surface of the subject property with movement anticipated to be directed northward and westward from the sites; groundwater movement may vary in direction depending upon local geology as well as water level fluctuations in St. Louis Bay and the adjacent Hughitt Slip.

PREVIOUS INVESTIGATIONS

TPT conducted a Phase I Environmental Property Assessment on the Hughitt Slip property in August, 1995 (TPT #539-95E.PI) for the RamsHorn Development Corporation. During an inspection of the property grounds, three sites of ground staining were identified. These sites included an area measuring approximately 3x4 feet located adjacent to and west of a concrete pad on the property's southern portion (Site 1); an area measuring approximately 3x3 feet located approximately 36 feet north of the concrete pad (Site 2); and an area containing several areas of ground staining located adjacent to and west of a vehicle turning area on the northern portion of the property (Site 3).

The Phase I assessment was followed by a Phase II investigation (TPT #552-95E.MM) of the three sites of ground staining. During the Phase II investigation, soil samples were collected from each of the three sites, and field screened for petroleum related organic vapors. Duplicate soil samples were analyzed for diesel range organics (DRO, petroleum volatile organic compounds (PVOCs), lead, cadmium, and chromium; and polychlorinated biphenyls (PCBs). Results of the field screening revealed organic vapor concentrations reading from 0.0 to 51 parts per million (ppm) throughout the sample suite. Results of the laboratory analyses revealed moderate to high concentrations of DRO (45.1 - 10,300 ppm); various minor detections of several specific petroleum-related compounds; minor to moderate concentrations of chromium (9.05 - 65.1 ppm); and moderate to moderately high concentrations of lead (46.5 - 222 ppm) at the sites. No cadmium or PCB contaminants were detected within the sample suite. In consideration of the high concentration of lead revealed from one of the sampling locations (Site 1), an additional soil sample was collected from the site of concern and analyzed for lead using toxicity characteristics leaching procedure (TCLP). Results of the TCLP analysis revealed no leachable lead detected in the soil sample (Table 1: Phase II Soil Analysis Results).

III. FIELD INVESTIGATION AND REMEDIAL ACTION

SURVEY OF POTENTIAL RECEPTORS

In an effort to identify potential receptors of any contamination associated with the three apparent spill sites located on the Hughitt Slip property, a well records search was requested from the Wisconsin Geological and Natural History Survey (WGNHS). Results of the WGNHS records search revealed no groundwater supply wells recorded within ¼ mile of the Hughitt Slip property (Appendix A: WGNHS Records Search Documentation). Field observation of the Hughitt Slip property and neighboring properties made by TPT during the project's investigation and cleanup operations revealed no well casing or other evidence of groundwater supply wells in the area.

METHODS / PRELIMINARY RESULTS

Following the confirmation of petroleum contamination at the three sites of surface staining, various investigation and remediation strategies were considered. In view of the very limited extents of surface stains observed, and the potential for accomplishing an effective cleanup of the sites involving a minimum of expense, an attempt was made to over-excavate contaminated soils in the areas of staining, for local disposal. With Wisconsin Department of Natural Resources (DNR) approval (TPT communication with Mr. Steve LaValley, acting DNR project manager, DNR Superior office, 9/7/95) TPT directed the excavation of approximately 16 cubic yards of contaminated and potentially contaminated soil from the three sites on September 26, 1995. The northernmost site (Site #3) was excavated in three adjacent but separate locations, corresponding to apparent surface stains observed (Figure 3: Initial Site Excavations). The excavations were advanced to depths of 1½ to 2 feet, and were guided by a TPT environmental technician. Soil samples were collected from each excavation and field screened for petroleum related organic vapors using a portable photoionization detector (PID: OVM Model 580 B, equipped with a 10.6 eV lamp) according to standard jar-headspace procedure. Duplicate soil samples were selected from the bases of the excavations and submitted to the laboratory for analysis for DRO, PVOCs and lead. No groundwater was encountered in any of the excavations. The contaminated soil was transported to Lakehead Blacktop and Materials of Superior for thermal treatment (DNR Soil Treatment Authorization, Appendix B).

Results of the field screening indicated low to moderate concentrations of organic vapors (0.0 to 71.7 ppm) for soils remaining at Sites 1,2,3b and 3c, with some elevated concentrations (127 - 155 ppm) in soils remaining at the 3a excavation (Table 2). Analysis results of the laboratory samples revealed nondetectable to low concentrations of DRO at Sites 1,2,3b and 3c, with elevated DRO concentrations (4240 ppm) at Site 3a; a low concentration of benzene at Site 3a; (0.019 ppm) and elevated lead concentrations (160 - 254 ppm) at sites 3a, 3b and 3c (Table 3).

METHODS / FINAL RESULTS

Following the receipt of the laboratory results associated with soils left in place from the initial excavations, the DNR requested additional remedial work be conducted at Site 3 (DNR correspondence, 12/8/95, Appendix C). In consideration of the contaminant concentrations involved, and the potential for associated groundwater contamination to have occurred at Site 3, a work plan was proposed to enlarge the Site 3 excavations to extend below the water table (TPT Proposal 95P-183E, Appendix D). Following DNR approval of the work plan (DNR correspondence 12/18/95, Appendix E), approximately 130 additional cubic yards of contaminated soil was removed from Site 3 on January 17, 1996. The initial 3a and 3b excavations were enlarged on all sides to form a single excavation, extending 2½ to 4 feet deep; the 3c initial excavation was enlarged on all sides and extended to approximately 3 feet deep (Figure 4). During the excavation enlargements, numerous treated timbers and pilings were encountered beneath the

surface. The excavations were guided by a TPT Environmental Technician using a portable PID as before. The excavations were halted when all field screening readings of excavation boundary soil samples registered below 1.0 ppm (Table 4: Field Screening Results, Final Excavations) Duplicate soil samples were selected from the excavations' walls at the water table and submitted to the laboratory for analysis for DRO, volatile organic compounds (VOCs), polynuclear aromatic hydrocarbons (PAHs) and lead. Due to the excavations having been extended below the water table, groundwater entered the excavations within a short period of time. One water sample (WS-1) was collected from the incoming water and submitted to the laboratory for analysis for gasoline range organics (GRO); DRO; benzene, toluene, ethylbenzene, and xylenes (BTEX); and lead. The contaminated soil was transported to the Jackson County Landfill for disposal (Appendix F: DNR Soil Disposal Authorization Permit).

Prior to backfilling, an attempt was made to remove all waste water which had accumulated within the excavations. The total removal of the waste water was found to be impracticable however, as the water removed was replenished almost immediately by incoming groundwater from the surrounding soils. Approximately 2,000 gallons of waste water was successfully removed and disposed of with the Western Lake Superior Sanitary District (WLSSD; Acceptance Documentation, Appendix G). The excavations were backfilled using uncontaminated sand fill imported from an off-site source. A temporary groundwater monitoring well screen and riser assembly was installed in the area of the former Site 3a excavation during the backfilling.

Results of the laboratory analyses of the soil samples collected from the final excavation boundaries indicated nondetectable to slight concentrations of DRO (0.0 - 71.1 ppm) and benzene (0.0 - 0.057 ppm), non-detectable to elevated concentrations of lead (0.0 - 321 ppm), and very low concentrations of various other VOC and PAH parameters (Table 5). Results of the laboratory analyses of the groundwater sample collected prior to the backfilling at the final excavation indicated a very slight presence of DRO (492 parts per billion or ppb) no detectable VOCs, and no detectable lead.

Following a communication update from TPT, the DNR requested additional soil samples be collected from the areas surrounding the former excavation sites, and an additional groundwater sample be collected (DNR correspondence, 2/23/96, Appendix H). On March 11, 1996, TPT placed a series of three hand auger borings (SSB-10,11 and 12) to surround the former excavation sites (Figure 4). A fourth hand auger boring (SSB-13) was placed approximately 70 feet south of the former excavation area to serve as a control or indicator of possible PAH background concentrations (Appendix I: Hand Auger Boring Logs/Boring Abandonment Forms). The borings were extended 2½ to 3 feet deep each with soil samples collected at the level of the water table. The soil samples were transported to the laboratory for analysis for VOCs, PAH compounds and lead. Each hand auger boring was abandoned using bentonite.

A second groundwater sample was collected on May 30, 1996, from the temporary groundwater monitoring well emplaced by TPT during the excavation backfilling, and analyzed for DRO, VOCs, PAHs and lead. Results of the hand auger boring soil sample

analyses indicated non-detectable to extremely low concentrations of various VOC parameters, non-detectable to moderately elevated concentrations of lead (0.0 - 216 ppm) and non-detectable to low concentrations of various PAH parameters (Table 5). No detectable concentrations of benzene were encountered surrounding the excavation area. Analysis of the hand auger boring soil sample collected approximately 70 feet south of the excavation area indicated a presence of PAH compounds similar to that indicated for the other hand auger samples, and the final excavation boundary soil samples.

Results of the second groundwater sample analysis indicated a reduced concentration of DRO (113 ppb) as compared to the first groundwater sample analysis, and very slight concentrations of n-butylbenzene (1.4 ppb), naphthalene (3.0 ppb) and lead (11.1 ppb; Table 6).

IV. DISCUSSION AND CONCLUSIONS

It appears from observations made during the project's field work, as well as the project's accumulated laboratory results, that the bulk of the petroleum related contamination has been effectively removed from the Hughitt Slip property excavation sites. Soil contamination indicated to remain at sites 1 and 2 includes 5.1 ppm DRO at Site 1, and no detectable PVOCs, no detectable lead, and no evidence of a likelihood of groundwater contamination at either site.

Site 3 soils appear to retain minor traces of VOC contaminants, confined to the area bounded by hand auger boring locations SSB-10, 11 and 12 and the Hughitt Slip. With the exception of benzene indicated in concentrations reaching 0.057 ppm, no concentrations of VOC parameters present in the site's soils exceed currently established DNR enforcement standards.

The presence of very low concentrations of various PAH parameters appears to exist throughout the Site 3 area soils and beyond, as evidenced from the area's soil analyses results and the analysis results from the soil sample (SSB-13) collected 70 feet south of the Site 3 excavation area. It appears likely that the PAH parameters observed through the soil analyses are related to the original coatings of the timber pilings encountered during the site's excavation. As such pilings appear to be present throughout the pier's construction, it seems reasonable to assume that such PAH concentrations represent a background chemistry likely to be present throughout the subject property, adjacent properties, and elsewhere along the city's waterfront areas, and do not represent contamination associated with any prior releases on the subject property.

The presence of elevated concentrations of lead in the Site 3 area soils appear distributed between the former Site 3 excavations' eastern boundaries and the Hughitt Slip. The highest concentrations of lead in the site's soils (above 300 ppm) appear within the immediate vicinity's of the former excavations, generally diminishing in both the southern and northern directions.

Groundwater in the vicinity of Site 3 appears to have experienced little impact associated with the contaminants identified in the site's soils. Over the course of the two groundwater sampling events, a very slight and diminishing presence of DRO, two trace concentrations of VOC parameters and a trace concentration of lead have been identified; no PAH constituents have been detected. No VOC, or lead concentrations have been observed in exceedence of currently established DNR groundwater enforcement standards.

TPT believes that reasonable efforts have been applied to restore the subject property's sites of environmental concern to a state of former environmental integrity. The sources of contamination have been removed and groundwater impacts sustained in the area of the Site 3 excavation register below currently established enforcement standards. In consideration of these aspects, and the lack of threat to human health or the environment, remediation of the Hughitt Slip property sites is considered complete by TPT.

V. RECOMMENDATIONS

TPT recommends no further remedial investigation or remedial action associated with the former sites of contamination identified on the Hughitt Slip property.

TPT recommends that the Wisconsin DNR consider the Hughitt Slip property sites for case closure.

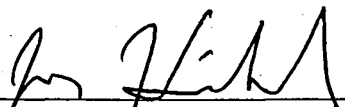
TPT recommends that the temporary groundwater monitoring well present at Site 3 be removed and formally abandoned, following DNR authorization and site closure.

VI. LIMITS OF INVESTIGATION AND REPORT

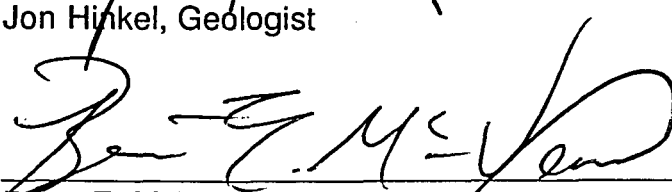
We have based the analysis and recommendations submitted in this report in part on the data obtained from monitoring wells, soil borings, excavation activities, and chemical analyses of samples obtained therefrom. The exact nature and extent of geologic variations and levels of contamination around the site may not be evident.

Conclusions and recommendations contained herein are based upon the applicable standards of our profession at the time this report was prepared.

This report was completed July 18, 1996 by **Twin Ports Testing, Inc.**

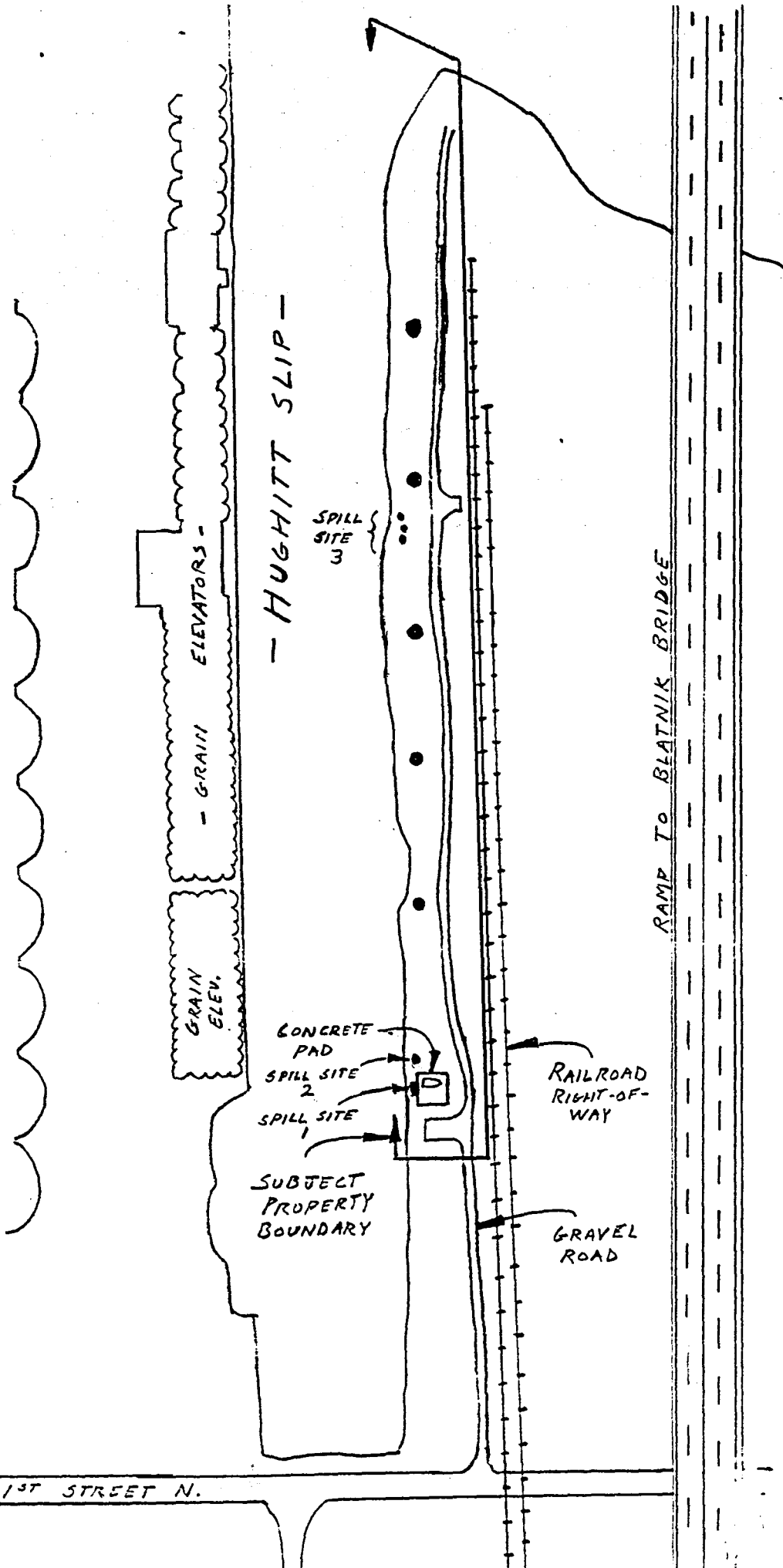


Jon Hinkel, Geologist



Brian E. McVean, P.E.
Environmental Department Manager

FIGURES



● MORING CLEAT

Figure 2
Site Map
Hughtitt Slip Property
Superior, Wisconsin

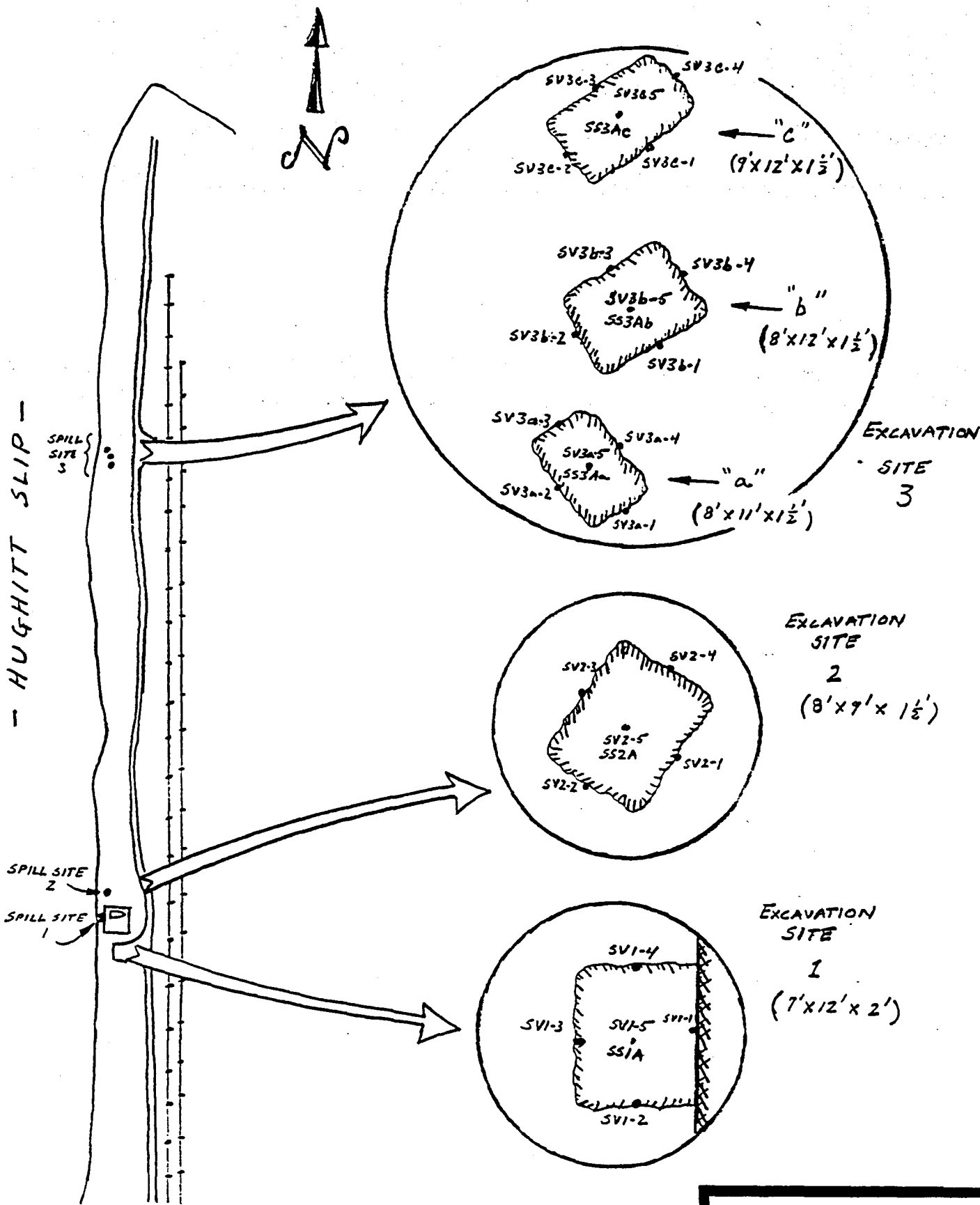


Figure 3
Initial Site Excavations
Hughitt Slip Property
Superior, Wisconsin

HUGHITT SLIP

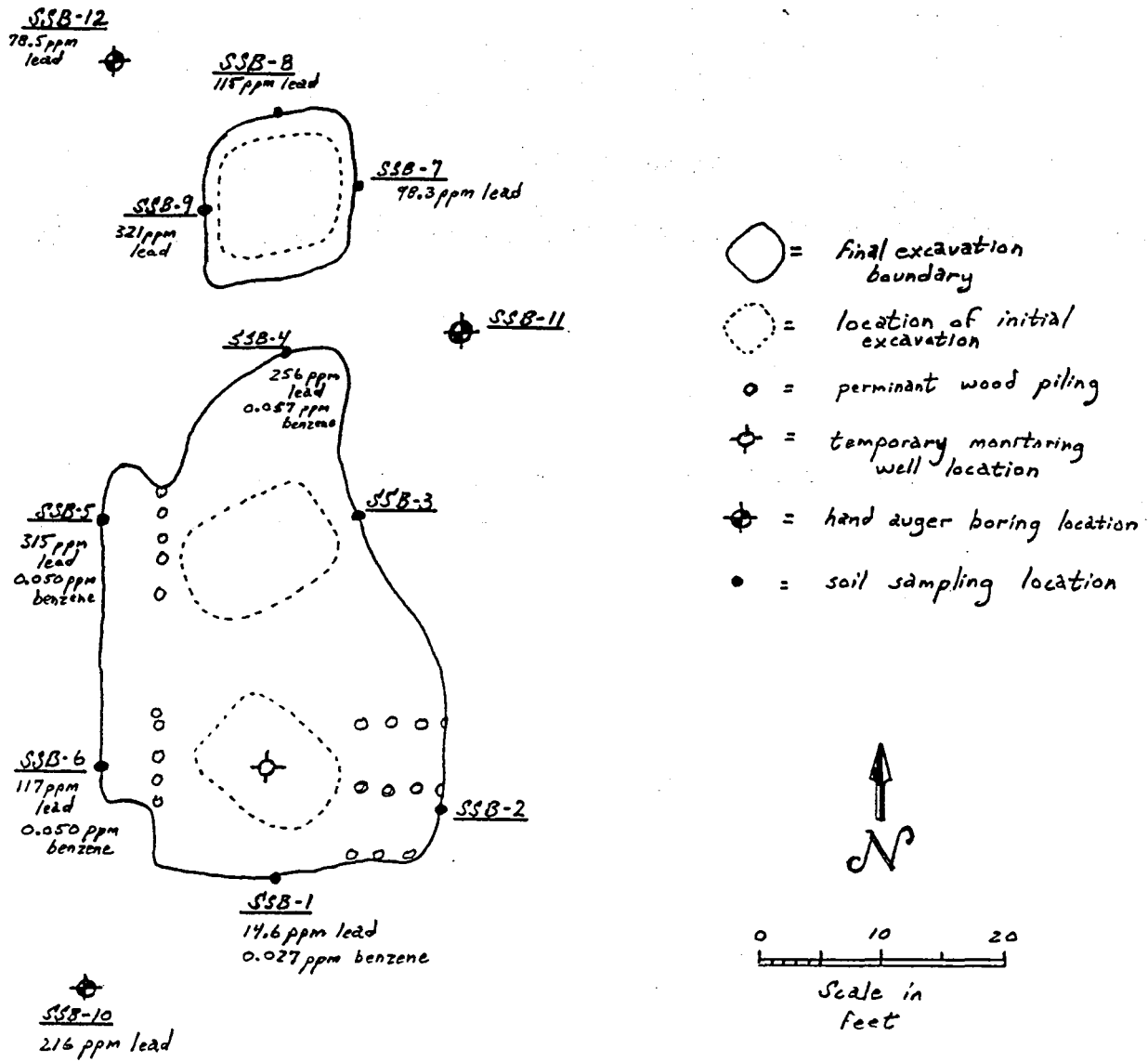


Figure 4
Final Excavations/Additional Test Borings
Hughitt Slip Property
Superior, Wisconsin

TABLES

**Table 1
Phase II Soil Analysis Results
Hught Slip Property
Superior, Wisconsin**

Parameter	Soil Sample Number Sampling Location Concentration in ppm			Wisconsin DNR Interim Soil Cleanup Guideline	Concentration Requiring Additional Analyses (TCLP)
	SS1 Site 1 adjacent to concrete pad	SS2 Site 2 north of concrete pad	SS3 Site 3 near vehicle turnaround		
Diesel Range Organics	10,300	45.1	456	100	--
Toluene	0.372	<	<	1.5	--
Xylenes	1.09	0.373	0.386	4.1	--
1,3,5-trimethylbenzene	0.990	<	<	--	--
1,2,4-trimethylbenzene	0.874	<	0.232	--	--
Lead	222	92.9	46.5	--	100
Chromium	16.1	65.1	9.05	--	100
Lead (TCLP analysis)	<	--	--	5.0	N/A

ppm = parts per million, equivalent to milligrams per kilogram, or mg/kg
 < = concentration below laboratory method detection limits
 -- = guideline not established/analysis not performed
 TCLP = toxicity characteristics leaching procedure

Table 2
Field Screening Results, Initial Excavations
Hughitt Slip Property
Superior, Wisconsin

Location	Sample Number	Organic Vapor Concentration (ppm)
Excavation Site 1	SV1-1	31.5
	SV1-2	67.0
	SV1-3	71.7
	SV1-4	12.8
	SV1-5	4.9
Excavation Site 2	SV2-1	0.0
	SV2-2	0.0
	SV2-3	0.0
	SV2-4	0.0
	SV2-5	0.0
Excavation Site 3a	SV3a-1	11.3
	SV3a-2	96.2
	SV3a-3	127
	SV3a-4	134
	SV3a-5	155
Excavation Site 3b	SV3b-1	3.3
	SV3b-2	2.7
	SV3b-3	2.4
	SV3b-4	2.1
	SV3b-5	3.9
Excavation Site 3c	SV3c-1	3.3
	SV3c-2	1.8
	SV3c-3	1.8
	SV3c-4	1.5
	SV3c-5	1.5

Note: * Organic vapor concentrations provided in parts per million (ppm)
 * All soil vapor samples were collected at the excavation bases, 1½ to 2½ feet below the surface.

**TABLE 3
Analysis Results
Initial Excavations
Hughitt Slip Property
Superior, Wisconsin**

Location	Soil Sample Number	Parameter, concentration (ppm)								
		DRO	Benzene	Toluene	Ethylbenzene	Xylenes	1,3,5-TMB	1,2,4-TMB	MTBE	Lead
Site 1	SS1A	5.10	< (at 0.005)	<	<	<	<	<	<	<
Site 2	SS2A	<	< (at 0.005)	<	<	<	<	<	<	<
Site 3a	SS3Aa	4240	< (at 0.025)	0.765	0.238	2.51	1.31	8.41	<	254
Site 3b	SS3Ab	11.8	0.019	0.219	<	<	<	<	<	257
Site 3c	SS3Ac	8.26	< (at 0.010)	<	<	<	<	<	<	160
Wisconsin DNR Interim Soil Cleanup Guideline/Maximum Allowable Leachable Metal Concentration		100	0.0055	1.5	2.9	4.1	--	--	--	--

DRO - diesel range organics
 MTBE - methyl tertiary butyl ether
 (at ___) - laboratory method detection limit

ppm - parts per million, equivalent to milligrams per kilogram or mg/kg
 < - concentration below laboratory method detection limits
 TMB - trimethylbenzene

TABLE 4
Field Screening Results
Final Excavations
Hughitt Slip Property
Superior, Wisconsin

Soil Vapor Sample (Sample #)	Depth in Feet	PID Reading in ppm
SV-1	1.5	0.0
SV-2	2.5	0.0
SV-3	1.5	0.0
SV-4	2.5	0.0
SV-5	1.5	0.0
SV-6	2.5	0.0
SV-7	1.5	0.0
SV-8	2.5	0.0
SV-9	1.5	146*
SV-10	2.5	90.0*
SV-11	1.5	40.0*
SV-12	2.5	50.7*
SV-13	1.5	5.1*
SV-14	2.5	1.1*
SV-15	1.5	0.0
SV-16	2.5	0.4
SV-17	1.5	0.0
SV-18	2.5	0.0
SV-19	1.5	0.0*
SV-20	2.5	29.9*
SV-21	1.5	0.0

Soil Vapor Sample (Sample #)	Depth in Feet	PID Reading in ppm
SV-22	2.5	0.0
SV-23	1.5	0.0
SV-24	2.5	0.0
SV-25	1.5	0.0
SV-26	2.5	0.0
SV-27	1.5	0.0
SV-28	2.5	0.0
SV-29	1.5	0.0
SV-30	2.5	0.0
SV-31	1.5	0.0
SV-32	2.5	0.0
SV-33	1.5	0.0
SV-34	2.5	0.0
SV-35	1.5	0.0
SV-36	2.5	0.0

Notes: PID = photoionization detector
ppm = parts per million organic vapors
* = area excavated following sample collection and field screening

During the field work, the water table appeared to lie approximately 2.5 feet below the surface.

**TABLE 5
ANALYSIS RESULTS
FINAL EXCAVATIONS/ADDITIONAL TEST BORINGS
HUGHITT SLIP PROPERTY
SUPERIOR, WISCONSIN**

Soils		Parameter, Concentration (ppm)									
Location	Sample #	DRO	VOCs								
			Benzene	Toluene	Ethylbenzene	Xylenes	1,3,5-TMB	1,2,4-TMB	MTBE	sec-BB	
Excavation Enlargement Area of Sites 3a & 3b	SSB-1	<	0.027	0.077	<	<	<	<	<	0.098	--
	SSB-2	<	<	<	<	<	<	<	<	<	--
	SSB-3	<	<	<	<	<	<	<	<	<	--
	SSB-4	61.5	0.057	0.094	0.050	0.160	0.036	0.052	<	<	--
	SSB-5	29.2	0.050	0.081	0.052	0.190	0.047	0.064	<	<	--
	SSB-6	22.3	0.050	0.084	0.053	0.180	0.043	0.059	<	<	--
Excavation Enlargement Site 3c	SSB-7	<	<	<	<	<	<	<	<	<	--
	SSB-8	<	<	0.049	0.044	0.140	0.039	0.051	<	<	--
	SSB-9	71.1	<	0.060	0.058	0.180	0.053	0.061	<	<	--
Test Borings	SSB-10	--	<	<	<	<	<	0.026	--	--	0.026
	SSB-11	--	<	<	<	<	<	<	--	--	<
	SSB-12	--	<	<	<	<	<	<	--	--	<
	SB-13 (control)	--	--	--	--	--	--	--	--	--	--
Wisconsin DNR Enforcement Standard/Interim Soil Cleanup Guideline		100	0.0055	1.500	2.900	4.100	--	--	--	--	--

ppm = parts per million, equivalent to milligrams per kilogram (mg/kg)
 PAHs = polynuclear aromatic hydrocarbons
 TMB = trimethylbenzene
 MTBE = methyl tertiary butyl ether
 < = concentration below laboratory method detection limit

VOCs = volatile organic compounds
 DRO = diesel range organics
 BB = butylbenzene
 TCB = trichlorobenzene
 -- = analysis not performed/DNR guideline does not exist

**TABLE 5
ANALYSIS RESULTS
FINAL EXCAVATIONS/ADDITIONAL TEST BORINGS
HUGHITT SLIP PROPERTY
SUPERIOR, WISCONSIN**

Soils		Parameter, Concentration (ppm)							
Location	Sample #	VOCs				Lead	PAHs		
		n-BB	Naphthalene	1,2,3-TCB	1,2,4-TCB		Acenaphthene	Anthracene	Benzo[a]anthracene
Excavation Enlargement Sites 1 & 2	SSB-1	--	--	--	--	14.6	--	--	--
	SSB-2	--	--	--	--	<	--	--	--
	SSB-3	--	--	--	--	<	<	<	0.0260
	SSB-4	--	--	--	--	256	--	--	--
	SSB-5	--	--	--	--	315	--	--	--
	SSB-6	--	--	--	--	117	0.419	0.0324	0.156
Excavation Enlargement Site 3	SSB-7	--	--	--	--	98.3	--	--	--
	SSB-8	--	--	--	--	115	--	--	--
	SSB-9	--	--	--	--	321	0.859	0.0807	0.421
Test Borings	SB-10	0.049	0.037	0.035	<	216	<	0.473	0.708
	SB-11	0.035	<	<	0.040	<	<	<	<
	SB-12	0.042	0.026	0.027	0.048	78.5	<	0.0930	0.392
	SB-13 (control)	--	--	--	--	--	<	<	0.00829
Wisconsin DNR Enforcement Standard/Interim Soil Cleanup Guideline		--	--	--	--	--	--	--	--

ppm = parts per million, equivalent to milligrams per kilogram (mg/kg)
PAHs = polynuclear aromatic hydrocarbons
TMB = trimethylbenzene
MTBE = methyl tertiary butyl ether
< = concentration below laboratory method detection limit

VOCs = volatile organic compounds
DRO = diesel range organics
BB = butylbenzene
TCB = trichlorobenzene
-- = analysis not performed/DNR guideline does not exist

**TABLE 5
ANALYSIS RESULTS
FINAL EXCAVATIONS/ADDITIONAL TEST BORINGS
HUGHITT SLIP PROPERTY
SUPERIOR, WISCONSIN**

Soils		Parameters, Concentrations (ppm)					
Location	Sample #	PAHs					
		Benzo[a]pyrene	Benzo[b]fluoranthene	Benzo[k]fluoranthene	Benzo[g,h,i]perylene	Chrysene	Dibenzo[a,h]anthracene
Excavation Enlargement Sites 1 & 2	SSB-1	--	--	--	--	--	--
	SSB-2	--	--	--	--	--	--
	SSB-3	0.0237	0.0195	0.0116	<0.0640	0.0363	<0.040
	SSB-4	--	--	--	--	--	--
	SSB-5	--	--	--	--	--	--
	SSB-6	0.134	0.117	0.0614	<0.320	0.235	<0.200
Excavation Enlargement Site 3	SSB-7	--	--	--	--	--	--
	SSB-8	--	--	--	--	--	--
	SSB-9	0.387	0.249	0.146	<0.640	0.618	<0.400
Test Borings	SB-10	0.892	0.734	0.270	<	<	<
	SB-11	0.00887	0.00735	0.00347	<	<	<
	SB-12	0.610	0.476	0.172	0.302	0.508	<
	SB-13 (control)	0.0163	0.0145	0.00696	0.00429	<	<
Wisconsin DNR Enforcement Standard/Interim Soil Cleanup Guideline		--	--	--	--	--	--

ppm = parts per million, equivalent to milligrams per kilogram (mg/kg)
 PAHs = polynuclear aromatic hydrocarbons
 TMB = trimethylbenzene
 MTBE = methyl tertiary butyl ether
 < = concentration below laboratory method detection limit

VOCs = volatile organic compounds
 DRO = diesel range organics
 BB = butylbenzene
 TCB = trichlorobenzene
 -- = analysis not performed/DNR guideline does not exist

**TABLE 5
ANALYSIS RESULTS
FINAL EXCAVATIONS/ADDITIONAL TEST BORINGS
HUGHITT SLIP PROPERTY
SUPERIOR, WISCONSIN**

Soils		Parameter, Concentration (ppm)						
Location	Sample #	PAHs						
		Fluoranthene	Fluorene	Indeno[1,2,3-cd]pyrene	1-Methyl Naphthalene	Naphthalene	Phenanthrene	Pyrene
Excavation Enlargement Sites 1 & 2	SSB-1	--	--	--	--	--	--	--
	SSB-2	--	--	--	--	--	--	--
	SSB-3	0.0512	<	<0.0160	--	<	0.0186	0.0605
	SSB-4	--	--	--	--	--	--	--
	SSB-5	--	--	--	--	--	--	--
	SSB-6	0.447	<	<0.080	--	<	0.223	0.503
Excavation Enlargement Site 3	SSB-7	--	--	--	--	--	--	--
	SSB-8	--	--	--	--	--	--	--
	SSB-9	1.120	<	<0.160	--	<	0.713	1.290
Test Borings	SB-10	2.250	0.255	0.501	0.191	0.401	1.890	2.400
	SB-11	0.0253	<	<	0.00950	0.00517	0.0285	<
	SB-12	1.530	<	0.353	<	0.0609	0.275	0.964
	SB-13 (control)	0.0467	<	0.00710	.0163	0.00950	0.0406	<
Wisconsin DNR Enforcement Standard/Interim Soil Cleanup Guideline		--	--	--	--	--	--	--

ppm = parts per million, equivalent to milligrams per kilogram (mg/kg)
 PAHs = polynuclear aromatic hydrocarbons
 TMB = trimethylbenzene
 MTBE = methyl tertiary butyl ether
 < = concentration below laboratory method detection limit

VOCs = volatile organic compounds
 DRO = diesel range organics
 BB = butylbenzene
 TCB = trichlorobenzene
 -- = analysis not performed/DNR guideline does not exist

TABLE 6
Groundwater Analysis Results
Hughitt Slip Property
Superior, Wisconsin

Sample # Collection Date	Parameter, Concentration (ppb)					
	DRO	VOCs			Lead	PAHs
		Toluene	n-Butylbenzene	Naphthalene		
WS-1 1/17/96	492	<	--	--	<	--
WS-2 5/30/96	113	<	1.4	3.0	11.1	<
Field Blank 5/30/96	--	2.1	<	<	--	--
Wisconsin DNR Enforcement Standard	--	343	--	40	15	various

- ppb - parts per billion, equivalent to micrograms per kilogram (mg/kg)
- DRO - diesel range organics
- VOCs - volatile organic compounds
- PAHs - polynuclear aromatic hydrocarbons
- < - concentration less than laboratory method detection limits
- - analysis not performed/enforcement standard not established

APPENDICES

Appendix A
WGNHS Records Search Documentation



University of Wisconsin—Extension

Wisconsin Geological and Natural History Survey
3817 Mineral Point Road - Madison, WI 53705-5100
TELEPHONE 608/262.1705 - FAX 608/262.8086
James M. Robertson, Director and State Geologist

FACSIMILE TRANSMISSION COVER SHEET

DATE 5/28/96

FROM K. Marine Ferch DIRECT TELEPHONE 608-262-9468

FAX NUMBER: 608/262-8086

MAIN OFFICE TELEPHONE: 608/262-1705



TO Jon Hinkel

FAX NUMBER 218-722-3295 TELEPHONE NUMBER 218-722-1911

ORGANIZATION/ADDRESS Twin Ports Testing, Inc.

NUMBER OF PAGES, INCLUDING COVER PAGE 3

[Please let us know if all pages are not received.]

COMMENTS:

You requested construction reports for
Sec 10 & 11, 49N, 14W
or geologic logs.
There are no records in this area.

Appendix B
DNR Soil Treatment Authorization Permit

**APPLICATION TO TREAT OR DISPOSE OF PETROLEUM CONTAMINATED SOIL
ASPHALT PLANT OR OTHER TYPE OF THERMAL TREATMENT UNIT**

Form 4400-149

Kummes

*Received 11/27/11
from
back to
-RJ*

This form is required by the Department of Natural Resources for leaking underground storage tank sites to ensure that petroleum contaminated soil is treated or disposed of in compliance with NR 500-540, NR 158, and NR 419, Wis. Adm. Code. Failure to comply with applicable statutes and administrative rules may lead to violations of subchapters III and IV of ch. 144 Wis. Stats. and may result in forfeitures of not less than \$10 or more than \$25,000 for each violation, pursuant to ss. 144.426(1), 144.74 (1), and 144.99, Wis. Stats., or fines of not less than \$100 or more than \$150,000 or imprisonment for not more than 10 years, or both, pursuant to s. 144.74 (2), Wis. Stats. Each day of a continuing violation constitutes a separate violation. Department approval of this form is required prior to site remediation, except for soils to be buried in landfills.

DIRECTIONS: 1) Complete parts I and II 2) Submit the application to the DNR project manager for approval. 3) Have the treatment facility complete part III of the approved form after the soil has been treated. 4) Return the ORIGINAL form to the DNR project manager. 5) Keep a copy for your files.

ALL SITES MUST COMPLETE PART I

Part I. Source of Soil

Site/Facility Name Hughitt Slip Property Site ID. # (for DNR use only) _____
 Site Address (no street address; see attached map) Contact Name Norman & Donna Camenker
 City, State, Zip Code Superior, Wisconsin 54880 1/4, 1/4, Section, Township, and Range NE 1/4, SE 1/4 Sec. 10, T49N, R14W

The information on this form is accurate to the best of my knowledge.

Signature of Soil Generator *Donna Camenker* Telephone Number (include area code) (715) 392-5457

Consulting Firm Twin Ports Testing, Inc. Contact Jon Hinkel Telephone Number (218) 722-1911

Estimated Volume Contaminated Soil 18 Tons cubic yards (circle one) Soil Type (USCS)
 Type of Petroleum Contamination (Circle):
 Gasoline Diesel Fuel/#2 Fuel Oil } fill material mixture of soils
 Other Waste Oil }
 sand (SP, SW)
 silty/clayey sands (SM, SC)
 silt (ML, MH, OL)
 clay (CL, CH, OH)
 gravel (GC, GM, GP, GW)
 peat (PT)

Distance to Nearest Residence/Business 800 ft.

Contaminant concentration:

One screened sample for each 15 yds³ and one laboratory analysis for each 300 yds³ of contaminated soil when the field instrument registers contamination OR one laboratory analysis for each 100 yds³ when the field instrument does not register contamination on soil shown to be contaminated during the site investigation/excavation or stockpiling. PLEASE ATTACH A TABLE LISTING RESULTS OF BOTH FIELD SCREENING AND LAB ANALYSES, AND INCLUDE SUPPORTING LAB REPORTS, IN ADDITION TO THE TPH AND BENZENE INFORMATION REQUESTED BELOW. NOTE: DILHR requires a minimum of 3 laboratory samples on excavated soil for PECFA claims.

Total Benzene in soil to be remediated (attach calculations) < 0.010 lbs

Total Petroleum Hydrocarbons (TPH) in soil to be remediated (attach calculations) 519 lbs

Total TPH as diesel range organics

ATTACH EMISSIONS CALCULATIONS

(a/1,000,000) x (2,800 lbs/yd³) x b = benzene emission in lbs., where a = benzene concentration of soil sample in ppm or mg/kg dry weight basis, and b = amount of contaminated soil in yds³. NOTE: This calculation can also be used to estimate TPH emissions by substituting TPH concentration (ppm or mg/kg) for "a". It may also be used to calculate VOCs.

Part II: Proposed Treatment Facility

Name of Plant Lakehead Blacktop & Mills. Plant number and Model Madson 4000 lb. *Batch plan*
 Contact Mr. Joe Kimmes DNR Facility ID. No. 816037640
 Address 6327 Tower Ave. Distance to Nearest Residence/Business 5000 ft.
 (or location of portable plant) Superior, WI 54880

LEAVE BLANK - DEPARTMENT OF NATURAL RESOURCES USE ONLY

Application Concurrence:

Air Management Phyllis Holmbeck Date 9/22/95
 Project Manager _____ Date _____

Comments:

THIS SECTION TO BE COMPLETED BY THE ASPHALT/THERMAL UNIT PROCESSING THE CONTAMINATED SOIL AFTER PROCESSING IS COMPLETED

Part III

WDNR Air Pollution Control Permit Number _____ Actual Volume of Soil Treated (tons/cubic yards) 16 yds
 Date of transport to plant September 26, 1995 Date of treatment November 8, 1995
 Transporter Name Earth Movers of Duluth Transporter License Number N/A
 Circle One: Roasted and Incorporated Roasted Only
 Total Benzene emissions in pounds for this batch (apply 50% destruction factor if no after burner is used) 99.90 Factor w/afterburner 0.0001 lbs
 Benzene emissions to date for this plant (including this batch) for this calendar year 2,426.76 lbs
 Signature of Treatment plant representative _____ Telephone Number at Plant 715-392-1969

POST BURN SAMPLE RESULTS: COMPLETE ONLY FOR SOILS NOT INCORPORATED!

(One representative sample for each 100 cubic yards-not composites)

Sample Number _____
 TPH _____

DNR APPROVAL IS REQUIRED BEFORE USING AS COMMON FILL

Date of backfilling or use as common fill _____ Location of fill site 1/4 1/4 S T R

TOTAL BENZENE CALCULATION:

$$\left(\frac{< 0.2 \text{ mg/kg}}{1,000,000} \right) \times \left(\frac{2,800 \text{ lbs.}}{1 \text{ cu yrd}} \right) \times (18 \text{ cu yrds}) = < 0.010 \text{ lbs. benzene}$$

$\frac{0.1\%}{1,000,000} \times 2800 \times 18 \text{ yds} = 0.0090 \text{ lbs}$
 $\frac{99\% \text{ Factor adjustment} = 0.0001 \text{ lbs}}$

Dzt. level

TOTAL PETROLEUM HYDROCARBONS CALCULATION:

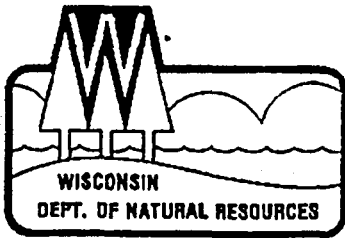
$$\left(\frac{10,300 \text{ mg/kg}}{1,000,000} \right) \times \left(\frac{2,800 \text{ lbs.}}{1 \text{ cu yrd}} \right) \times (18 \text{ cu yrds}) = 519 \text{ lbs. TPH}$$

Feed rate Calc.

98% dist.

$$\begin{aligned} \text{X tons/hr} &= \frac{(9 \text{ lb/hr}) * (1.4 \text{ ton/yd}^3) * 18 \text{ yd}^3}{519 \text{ lb DRO} * (1 - 0.98)} \\ &= 21.85 \text{ yd}^3/\text{hr.} \end{aligned}$$

Appendix C
DNR Correspondence, 12/8/95



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Brule Area Headquarters
6250 South Ranger Road
P.O. Box 125
Brule, WI 54820-0125
TELEPHONE 715-372-4866
TELEFAX 715-372-4836

George E. Meyer
Secretary

December 8, 1995

*Received 12/11/95
RJH*

MR AND MRS NORMAN CAMENKER
70 HIGHGATE ROAD
SUPERIOR WI 54880

SUBJECT: Petroleum Contamination at the Hughitt Slip Property, Superior, Wisconsin

Dear Mr. and Mrs. Camenker:

The Department has received the Phase II Sampling and Testing Results, prepared for the above named site by Twin Ports Testing, Inc. (TPT) and dated September 12, 1995, and the Preliminary Results - Remedial Action, also prepared by TPT and dated November 29, 1995. These reports describe investigative and remedial actions taken by TPT in response to environmental contamination encountered on this property during a Phase I investigation.

Based on the information we have received, the Department believes that you are responsible for restoring the environment at this site under Section 144.76, Wisconsin Statutes, known as the hazardous substances spills law. Your responsibilities include investigating the extent of the contamination, and then selecting and implementing the most appropriate remedial action. Enclosed is information to help you understand what you need to do to ensure your compliance with the spills law.

The purpose of this letter is twofold: 1) to describe your legal responsibilities, and 2) to provide you with the results of the Department's review of the work that has been completed to date.

Legal Responsibilities:

Your legal responsibilities are defined both in statute and in administrative rules. The hazardous substances spill law, Section 144.76 (3), Wisconsin Statutes, states:

- * **RESPONSIBILITY.** A person who possesses or controls a hazardous substance which is discharged or who causes the discharge of a hazardous substance shall take the actions necessary to restore the environment to the extent practicable and minimize the harmful effects from the discharge to the air, lands, or waters of the state.

Wisconsin Administrative Codes NR 700 through NR 728 establish requirements for emergency and interim actions, public information, site investigations, design and operation of remedial action systems, and case closure. Chapter NR 708 includes provisions for immediate actions in response to limited contamination. Wisconsin Administrative Code NR 140 establishes groundwater standards.

Department Review of Previous Work:

After reviewing the reports submitted by TPT, it is apparent that additional remedial actions are necessary here. The sample collected at the base of excavation 3a contained DRO levels in excess of the ch. NR 720, Wis. Adm. Code, soil cleanup standards. You should work with TPT to formulate a plan to fully define and remediate the contamination remaining at this site, and to properly treat or dispose of the excavated contaminated soil in accordance with ch. NR 718, Wis. Adm. Code.

Due to the number of contaminated sites and our staffing levels, we will be unable to respond to each report. To maintain your compliance with the spills law and chs. NR 700 through NR 728, do not delay the investigation and cleanup by waiting for DNR responses. We have provided detailed technical guidance to environmental consultants. Your consultant is expected to be familiar with our technical procedures and administrative codes and should be able to answer your questions on meeting Wisconsin's cleanup requirements.

Your correspondence and reports regarding this site should be sent to the Department at the following address:

Christopher A. Saari
WDNR Brule Area Headquarters
6250 S. Ranger Rd.
PO Box 125
Brule, WI 54820-0125

Unless otherwise requested, please send only one copy of all plans and reports. Correspondence should be identified with the assigned DNR identification number which will be assigned to your site within 7 days.

Additional Information:

If you are interested in obtaining the protection of limited liability under s. 144.765, Stats., please contact the Contaminated Land Recycling Program at (800) 367-6076 (instate long distance) or (608) 264-6020 (local or out of state), in the Department of Natural Resources' Madison office for more information. The liability exemption under s. 144.765 Stats., is available to persons who meet the definition of "purchaser" in s. 144.765 (1)(c) and receive Department approval for the response actions taken at the property undergoing cleanup. The Department will determine eligibility for this program on a case-by-case basis, prior to the "purchaser" developing a scope of work for conducting a ch. NR 716 site investigation at the property.

If you have any questions about this letter or your responsibilities, please call me at (715) 372-4866.

Thank you for your cooperation.

Sincerely,



Christopher A. Saari
Hydrogeologist

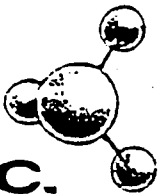
Attach.

cc: Jon Hinkel - Twin Ports Testing, Inc.

Appendix D
TPT Proposal/Work Plan 95P-183E

TWIN PORTS TESTING INC.

SINCE 1972



1301 NORTH THIRD STREET • SUPERIOR, WISCONSIN 54880
(715) 392-7114 • FAX (715) 392-7163

728 GARFIELD AVENUE • DULUTH, MINNESOTA 55802
(218) 722-1911 • FAX (218) 722-3295

8 INDUSTRIAL PARK ROAD • NEGAUNEE, MICHIGAN 49866
(906) 226-6653 • FAX (906) 226-3699

December 21, 1995

Norman and Donna Camenker
70 Highgate Ct.
Superior, Wisconsin 54880

Job #
599-95E, RA

Proposal 95P-183E

(Job File copy)

Re: Continuation of Remedial Action
Hughitt Slip Property
Superior, Wisconsin

Dear Mr. and Mrs. Camenker:

Since you and I last spoke, Mr. Chris Saari of the Wisconsin Department of Natural Resources (DNR) has responded to Twin Ports Testing, Inc's. (TPT's) reports of the contamination encountered on the Hughitt Slip property in Superior, Wisconsin, in a correspondence, dated December 8, 1995. The correspondence indicated that the DNR's present concern regarding the property lies with the elevated contaminant concentrations remaining in the 3a excavation soils. Though no mention was made in the correspondence specifying a concern regarding the site's groundwater, it is TPT's opinion that the DNR site closure committee will require confirmation of groundwater integrity as well as confirmation of soil integrity for the property's sites before closure will be granted. Mr. Saari concurs with TPT's opinion (TPT telephone communication with Chris Saari, 12/12/95).

In an effort to better assess the soil conditions at each of the excavated sites, TPT recently directed the laboratory to re-evaluate the analyses results of the September excavation soil samples with regard to detection limits of the petroleum volatile organic compound (PVOC) parameters. The laboratory responded by reporting their detection limits for these parameters well below the original detection limits of 200 parts per billion (ppb; see laboratory report revision, attached). The revised laboratory reports indicate no detections of benzene for sites 1 and 2 at concentrations at or above 5 ppb. The analytical results for all parameter concentrations of the soil samples of sites 1 and 2 are thus confirmed to lie below DNR Interim Soil Cleanup Guidelines (see attached listing); no additional environmental work should be required at either of these sites by the DNR.

With regard to the individual sites of 3a, 3b and 3c, it appears that DRO and/or benzene concentration lie above or may lie above current DNR Interim Soil Cleanup Guidelines. Such results serve to indicate the need for further cleanup efforts as determined by the DNR.

WORK PLAN

TPT proposes enlarging the present excavations numbered 3a, 3b, and 3c in all directions in an effort to remove remaining contaminated soil. The excavations would be conducted using a backhoe as before, guided by a TPT Environmental Technician using a portable photoionization detector (PID) according to standard jar-headspace procedure. Laboratory conformation soil samples would be collected from the excavation's bases and sidewalls and transported to the laboratory according to standard chain-of-custody procedures. Excavated soils would be loaded directly into dump trucks for transport to an appropriate remediation/disposal facility. Any groundwater entering the excavations would be pumped into a tanker truck for disposal with an appropriately permitted agency or firm.

The excavations would be backfilled using uncontaminated soil imported from a separate locality. During backfilling, one to three screen - riser assemblies would be installed in the excavated area to serve as collection points for groundwater sampling. Efforts would be made to develop these temporary groundwater collections points as fully as possible, with one or more groundwater samples collected for submission to the laboratory.

Laboratory soil and groundwater samples would be analyzed for diesel range organics (DRO), petroleum volatile organic compounds (PVOC) and lead. Polynuclear aromatic hydrocarbon (PAH) analyses would be conducted for soil and groundwater samples collected from the general area of site 3a.

Following completion of the field work, a report would be prepared summarizing the project's methods and results for review by you as well as the DNR.

ESTIMATED COSTS

At present, TPT is in the process of gathering estimates from various firms and contractors for the excavation, hauling and disposal of the site's remaining contaminated soil; the pumping, trucking and disposal of any groundwater which may accumulate in the excavations during soil removal; and the delivery of backfill material. As the various estimates are received, TPT will make them available to you for comparison. Following your acceptance of the appropriate firms or contractors, TPT will schedule the field work and continue with the project as planned. Preliminary groundwater sampling and analysis is anticipated as a requisite to gaining a cost effective means of any wastewater disposal which may be necessary.

FIELD WORK

Contractor:

Excavation, and trucking:
petroleum contaminated soil
(est. 200 cubic yards or less) \$ To be determined

Disposal: petroleum
contaminated soil \$ To be determined

Removal of wastewater
from excavation
(est. 2300 gallons or less) \$ To be determined

Treatment/disposal:
excavation wastewater \$ To be determined

Environmental Consultant:

Preliminary groundwater sample
collection; excavation monitoring;
soil sample collection and field
screening; screen-riser assembly
installation(s); development and
groundwater sample collection
(Environmental Technician I:
est. 12-15-hours) \$ 552.00 - 690.00

Equipment and Supplies
(vehicle, PID, sample jars, 1-3
screen-riser assemblies, 1-3
disposable bailers, lead filters,
disposable sampling gloves) \$ 214.00 - 338.00

LABORATORY ANALYSES

Soils:

8-15 samples: DRO, PVOC, Lead \$ 1171.00 - 2370.00
1-3 samples: PAH

Groundwater (including field blank):

2-4 samples: DRO, PVOC, Lead, PAH \$ 465.00 - 803.00
1 sample: TPH, BTEX, Lead

PROJECT MANAGEMENT/REPORTING

Environmental Consultant:

\$ 1190.00 - 1700.00

(Environmental Technician II, est.
20-30 hours; Environmental Dept.
Manager, est. 2 hours; Secretarial
Services)


SCHEDULE

It is anticipated that the remainder of the cost estimates will be available within one week. Following your approval of the necessary contractors or firms, we anticipated that the project's field work may commence within two weeks thereafter. The project's final report should be available within one month of the field work's commencement.

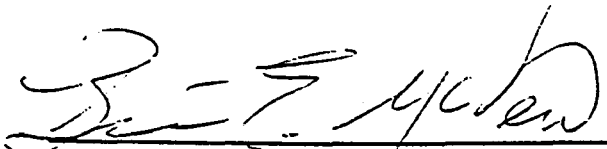
We appreciate the opportunity to submit this proposal and look forward to working with you on the project. If you have any questions regarding this proposal, please feel free to contact us at (906) 226-6653 or (218) 722-1911.

Sincerely,

TWIN PORTS TESTING, INC.



Jon Hinkel, Geologist



Brian E. McVean, P.E.
Environmental Department Manager

RJH:pjd

Attachments: Revised Laboratory Reports
DNR Interim Soil Cleanup Guidelines

This proposal is being provided to you in duplicate. If you agree to accept this proposal, along with the General Conditions of Service, please sign and return one copy to us to use as our authorization to proceed with this project.

Signed *Dona Camenker - Raymond B Camenker*

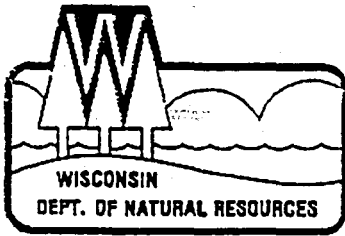
Date *12/21/95*

Printed Name *DONA CAMENKER*

Title _____

Company _____

Appendix E
DNR Correspondence, 12/28/95



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Brule Area Headquarters
6250 South Ranger Road
P.O. Box 125
Brule, WI 54820-0125
TELEPHONE 715-372-4866
TELEFAX 715-372-4836

George E. Meyer
Secretary

December 28, 1995

MR AND MRS NORMAN CAMENKER
70 HIGHGATE COURT
SUPERIOR WI 54880

Re: Petroleum Contamination at the Hughitt Slip Property (NWD ERP Case #16-00170),
Superior, Wisconsin

Dear Mr. and Mrs. Camenker:

The Department has received the work plan for Continuation of Remedial Action at the above named site, prepared by Twin Ports Testing, Inc. (TPT) and dated December 21, 1995.

After reviewing the proposal, the Department finds it to be acceptable, and we encourage you to instruct TPT to proceed with the measures specified in the work plan. As was pointed out in the work plan, it is likely that some type of continued groundwater monitoring will be necessary before this case could be reviewed for closure.

If you have any questions concerning this letter or the project in general, please do not hesitate to write or call me at 715/372-4866.

Sincerely,

Christopher A. Saari
Hydrogeologist

cc: Jon Hinkel - Twin Ports Testing, Inc.

Appendix F
DNR Soil Disposal Authorization Permit

original delivered
to Phyllis Helmbeck
by RJH 1/4/95 4:30 pm

State of Wisconsin
Department of Natural Resources

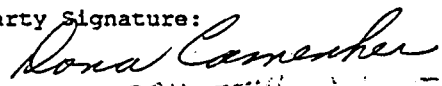
**NOTIFICATION TO TREAT OR DISPOSE OF
PETROLEUM CONTAMINATED SOIL & WATER**

Form 4400-120
Rev. 9-95

This form is required by the Department of Natural Resources (DNR) to ensure that the remediation of petroleum contaminated soil and water is in compliance with NR 500-540, NR 158, NR 419 and NR 445, Wis. Adm. Code. Failure to comply with applicable statutes and administrative rules may lead to violations of subchapters III and IV of Ch. 144, Wis. Stats. and may result in forfeitures of not less than \$10 or more than \$25,000 for each violation, pursuant to ss. 144.428(1), 144.74(1), 144.99, Wis. Stats., or fines of not less than \$100 or more than \$150,000 or imprisonment for not more than 10 years, or both, pursuant to s. 144.74(2), Wis. Stats. Each day of a continuing violation constitutes a separate violation. Except for the remediation of virgin petroleum spills, this form needs to be submitted to the DNR 10 business days prior to the commencement of the remediation.

DIRECTIONS: 1) Complete both sides of the form. 2) Have the responsible party sign the form. This signature certifies that the information on this form and in all supporting documents is accurate. 3) Submit the form with supporting documentation, lab reports and any maps to the appropriate District Air Management Program at least 10 business days prior to the commencement of remediation. 4) Submit a copy of this form to the DNR project manager and retain a copy for your records.

PART I - GENERAL INFORMATION

Site Name & Address: <i>Hughitt Slip Property Superior, Wisconsin (no street address - see attached maps)</i>	Date of Form Completion: <i>January 4, 1996</i>
Site #: <i>Excavation # 3 area (see Figure 3, attached)</i>	Do Other Remediation Systems Exist at This Site? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
County: <i>Douglas</i>	Site Type: <input type="checkbox"/> LUST <input type="checkbox"/> ERP <input type="checkbox"/> CERCLA <input type="checkbox"/> Other, Explain: <i>spill site - apparently waste oil</i>
Responsible Party Name & Address: <i>Norman & Donna Camenker 70 Highgate Court Superior, Wisconsin 54880</i>	Responsible Party Signature:  Telephone #: <i>394-5244 (Ariz.) (715) 342-5457 (WI) (602) 855-4825 (Ariz.)</i>
Consulting Firm Name & Address: <i>Twin Ports Testing, Inc. 728 Garfield Avenue Duluth, Minnesota 55802</i>	Consulting Firm Contact: <i>Jon Hinkel, geologist</i> Telephone #: <i>(218) 722-1911</i>

PART II - SOIL AND WATER DATA (Attach Lab Reports and Calculations) *

Type of Contamination:		<input type="checkbox"/> Gasoline	<input type="checkbox"/> Diesel	<input type="checkbox"/> Fuel Oil	<input checked="" type="checkbox"/> Waste Oil
		<input type="checkbox"/> Chlorinated Organics	<input type="checkbox"/> Other: _____		
Soil Concentration:					
GRO:	_____ lb	_____ mg/kg/10 ⁶	x 2,800 lb/yd ³	x _____ yd ³	= _____
DRO:	<u>2370</u> lb	<u>4240</u> mg/kg/10 ⁶	x 2,800 lb/yd ³	x <u>200</u> yd ³	= <u>2370</u>
Benzene:	_____ lb	<u><.025</u> mg/kg/10 ⁶	x 2,800 lb/yd ³	x <u>200</u> yd ³	= <u><0.014</u> lb
Chlorinated Organics:	_____ lb	_____ mg/kg/10 ⁶	x 2,800 lb/yd ³	x _____ yd ³	= _____
Other:	_____ lb	_____ mg/kg/10 ⁶	x 2,800 lb/yd ³	x _____ yd ³	= _____
Water Concentration: GRO: _____ mg/L DRO: _____ mg/L Benzene: _____ mg/L					
Chlorinated Organics: _____ mg/L Other: _____ mg/L					

PART III - TREATMENT OR DISPOSAL FACILITY INFORMATION

Treatment/Disposal Facility Name & Address: Jackson County Landfill, Inc. Route 3, Box 95B Black River Falls, WI 54615	Facility ID: 02004
	Air Pollution Control Permit #: Not necessary
Facility Contact: Alina Limberg Telephone #: (715) 284-2262	Facility Located in 10-county Area in Southeast Wisconsin: No Distance to Nearest Residence or Business: 1 1/2 miles
Headquarter Address: Same as above.	Portable Sources Only: Has a Portable Source Relocation Notification (Form 4500-25) Been Submitted for this Location: <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO N/A

* Please note: the concentrations provided for DRO and Benzene are maximum readings; the bulk of our sample analyses results are much lower concentrations.

PART III - SOIL VACUUM EXTRACTION OR GROUNDWATER REMEDIATION

Site Contact & Telephone #: <hr/> Is Site Located in the 10-county Area in <hr/> Distance to Nearest <hr/> <u>Pilot Test/Soil Venting Only</u> (Attach Lab Reports and Calculations) Date of Test: Flow Rate (scfm): - Not Applicable - Total Withdrawal of Air (scf): Total VOC Emission Rate (lb/hr): Benzene Emission Rate (lb/hr):	<u>Proposed Operations (Attach Calculations)</u> Anticipated Start-Up Date: Estimated Project Duration: # of Wells: # of Emission Points: Stack Height: - Not Applicable - Maximum Equipment Flow Rate (scfm or gpm): Total VOC Emission Rate (lb/hr): Benzene Emission Rate (lb/hr): Benzene Emission Rate (lb/yr):
---	---

PART III - OTHER REMEDIATION METHODS

Proposing Other Remediation Method: YES Method Name: _____

Attach a project description for other remediation methods including landspreading, passive aeration and bioremediation. At a minimum, the information submitted should include the following items (with any supporting lab reports and calculations):

- ✓ Address/Location of Remediation Site - Indicate if this location is in the 10-county area in Southeast Wisconsin and the distance to the nearest residence or business. Include a map or site plan if appropriate.
- ✓ Description of Remediation Method
- ✓ Project Contact & Telephone #
- ✓ Anticipated Start-Up and Estimated Project Duration
- ✓ Highest Estimated Hourly VOC Emissions
- ✓ Highest Estimated Hourly and Annual Benzene Emissions
- ✓ Emission Testing Methodology
- ✓ Final Destination of Soil

- Not Applicable -

Appendix G
WLSSD Approval for Waste Water Acceptance



1626 COURTLAND STREET DULUTH MINNESOTA 55806-1894 PHONE 218/722-3336
FAX 218/727-7471

May 24, 1996

Mr. Jon Hinkel
Twin Ports Testing
728 Garfield Avenue
Duluth, MN 55802

Re: WLSSD Discharge Approval

Dear Mr. Hinkel:

The data provided on 5/24/96 , as requested, meets the WLSSD discharge requirements for this type of waste. Based on this information, the WLSSD approves the discharge of approximately 2,000 gallons of water that was recovered from an excavation site located in Superior Wisc. adjacent to the Hughitt Slip provided that there is no visual sign of oil, grease or other petroleum related products or other sources of contaminants. This contaminated water is to be disposed of at the WLSSD's main treatment facility which is located at 2626 Courtland in Duluth.

This is a one time only approval for the waste described. It does not release Twin Ports Testing from any conditions/regulations set forth by the MPCA and/or any other agency which regulates the waste being discharged. In addition, this approval does not release Twin Ports Testing or any consultant/contractor involved from any subsequent liabilities associated with conducting this discharge.



Mr. Jon Hinkel
WLSSD Discharge Approval
Page 2
May 24, 1996

A copy of this letter of approval and analysis is to accompany each load that is to be disposed of and given to the gatekeeper.

If there are any questions, please contact me at 722-3336 ext. 239.

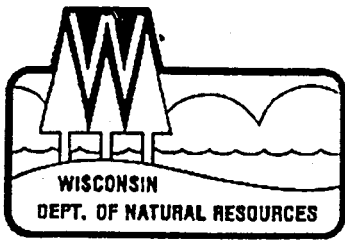
Sincerely,



Mike Guite
Supervisor of Laboratory/Analytical Services

cc: Gate House

Appendix H
DNR Correspondence, 2/23/96



DK 2/24

State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Tommy G. Thompson, Governor
George E. Meyer, Secretary
William H. Smith, District Director

Brule Area Headquarters
6250 South Ranger Road
P.O. Box 125
Brule, WI 54820-0125
TELEPHONE 715-372-4866
TELEFAX 715-372-4836

February 23, 1996

MR & MRS NORMAN CAMENKER
70 HIGHGATE COURT
SUPERIOR WI 54880

Re: Petroleum Contamination at the Hughitt Slip Property (NWD ERP Case #16-00170)

Dear Mr. and Mrs. Camenker:

The Department has received the proposal for further soil and groundwater sampling at the above named site, prepared by Twin Ports Testing, Inc. (TPT), and dated February 20, 1996. After reviewing the proposal, the Department feels that the soil sampling protocol should be modified to include full Volatile Organic Compound (VOC), Polynuclear Aromatic Hydrocarbon (PAH) and lead (Pb) analyses at each of the three locations intended to define the degree and extent of contamination. The full VOC sampling is necessary due to the unknown nature of the contaminants. The Department is suggesting the collection of the PAH samples because, if TPT fails to demonstrate that previous PAH detections are reflective of background conditions, the Department will likely require you to return to these areas to collect PAH samples to define the degree and extent of contamination. The proposed analyses for background PAH and groundwater samples are acceptable.

Your site is currently ranked as a "High priority" site based on risk to the public and the environment. However, current workload and staffing levels do not allow us to provide you with direct oversight at this time. This letter serves as your "Notice to Proceed" with investigation and remediation of the site. All actions must comply with all applicable Federal and State laws, Wisconsin Administrative Code chs. NR 140, NR 141, NR 700 through NR 728, and program guidance. This letter is not an approval of future work plans and/or reports. They will be filed as public records until the Department is able to review them, or until site remediation is completed.

In order to ensure compliance with applicable requirements and to make sure your project proceeds to closure in a timely fashion, your consultant should follow the Department's Guidance for Conducting Environmental Response Actions. All groundwater and soil samples must be collected and analyzed in accordance with the Department's Leaking Underground Storage Tank (LUST) and Petroleum Analytical and Quality Assurance Guidance. It is very important that your consultant understands and meets the standards established by the Department; however, per s. 144.76, Wisconsin Statutes, as the responsible party, you are ultimately responsible for the investigation and remediation that is required at your site. Failure to follow guidance may result in delays when the site is reviewed for closure.

If you are interested in obtaining the protection of limited liability under s. 144.765, Wis. Stats., please contact the Contaminated Land Recycling Program at (800) 367-6076 (instate long distance) or (608) 264-6020 (local or out of state), in the Department of Natural Resources' Madison office for more information. The liability exemption under s. 144.765, Wis. Stats., is available to persons who meet the definition of "purchaser" in s. 144.765 (1)(c) and receive Department approval for the response actions taken at the property undergoing cleanup. The Department will determine eligibility for this program on a case-by-case basis, prior to the "purchaser" developing a scope of work for conducting a ch. NR 716, Wis. Adm. Code, site investigation at the property.



Effective the date of this letter, every 90 days, you or your consultant should provide the Department with a brief status report of one or two pages, providing an update on site activities and your proposed schedule. The Department must be notified immediately of any emergency conditions (e.g. explosive vapors in a basement, contaminated drinking water well, detection of free product), and you must implement any actions necessary to correct the emergency situation as soon as possible.

The Department will continue to review soil disposal notifications as they are submitted. Any well construction variances or WPDES permits should be obtained prior to construction, disposal or discharge. The Department will review your case for closure when the full extent of contamination has been determined and the appropriate cleanup has been completed.

As workload and staff levels are adjusted, the status of this case may be changed and we may be able to review your consultant's work for completeness and acceptability. You will be informed, in writing, if the site status is changed.

If you should have any questions, please feel free to contact our office at 715/372-4866.

Sincerely,



Christopher A. Saari
Hydrogeologist

cc: Jon Hinkel - Twin Ports Testing, Inc., 728 Garfield Ave., Duluth, MN 55802

**Appendix I
Hand Auger Boring Logs
Boring Abandonment Forms**

Twin Ports Testing, Inc.

Soil Boring Field Log

Client Norman & Debra Lamenker

Boring # SSB-10

Project Hughitt Slip Site (599-95E.RA)

TPT JOB # 599-95E.RA

Boring Location 10' south of large Excavation

Page 1 of 1

Weather Mild ($\approx 35^{\circ}F$) windy, partly cloudy

Date Start 3-11-96 Date End 3-11-96

Crew Chief RJH

Helper —

Rig → Other Tech. (Hand Auger)

Sample #	Sample Type	SAMPLE			PENETRATION RECORD				N-Value (A+B)	SP	PID	
		Start Depth	Sample Distance	Recovery Length	0' - 6'	A 6' - 12'	B 12' - 18'	18' - 24'				
SSB-10		0	2.5'	2.5'					—	—		Medium to coarse grained sand - medium brown to dark brown, frozen to approx 1.6' depth, 1/2 - 1" dia gravel encountered at approx 1.7' depth, groundwater encountered at 2.2' depth SSB-10 collected at 12:45 pm hand auger boring filled w/ bentonite chips - 12:50 pm, - RJH

Surface Elevation 0.0

WATER LEVEL OBSERVATIONS

Cave In Level None

WL1 2.2'

Remarks Frost extends to 1.6' deep.

WL2 _____

WL3 _____

WL4 _____

Enviro. Test Type _____

Water Table 2.2'

Twin Ports Testing, Inc.

Soil Boring Field Log

Client Norman and Dona Cemecker
 Project Hughitt Slip Property
 Boring Location East of the excavations
 Weather Mild (73°F) windy, partly sunny

Boring # SSB-11
 TPT JOB # 599-95E
 Page 1 of 1
 Date Start 3-11-96 Date End 3-11-96
 Crew Chief Jon Hinkel
 Helper —
 Rig → Other Tech. (Hand Auger Boring)

Sample #	Sample Type	SAMPLE			PENETRATION RECORD				N-Value (ArB)	SP	PID	
		Start Depth	Sample Distance	Recovery Length	0'-6"	A 6'-12"	B 12'-18"	18'-24"				
SB-11		0	2	1					-	-		Medium to coarse grained black and brown sand and 1/2-1" dia. gravel; minor wood
		2	3						-	-		Brown medium grained sand, coarse grained sand, minor gravel
												SSB-11 collected at 2.3' deep at 2:00 pm bore hole abandoned with bentonite 2:20 pm

Surface Elevation 0.0
 Cave In Level —
 Remarks Frost approx 1.8' deep

 Enviro. Test Type _____

WATER LEVEL OBSERVATIONS
 WL1 2.5'
 WL2 _____
 WL3 _____
 WL4 _____
 Water Table 2.5'

All abandonment work shall be performed in accordance with the provisions of Chapters NR 111, NR 112 or NR 141, Wis. Admin. Code, whichever is applicable. Also, see instructions on back.

(1) GENERAL INFORMATION		(2) FACILITY NAME	
Well/Drillhole/Borehole Location <u>55B-10</u>	County <u>Douglas</u>	Original Well Owner (If Known)	
NE 1/4 of SE 1/4 of Sec. <u>10</u> ; T. <u>49</u> N. R. <u>14</u> <input type="checkbox"/> E <input checked="" type="checkbox"/> W (If applicable)		Present Well Owner <u>Norman & Donna Camenker</u>	
Gov't Lot _____ Grid Number _____		Street or Route <u>70 Highgate Court</u>	
Grid Location _____ ft. <input type="checkbox"/> N. <input type="checkbox"/> S. _____ ft. <input type="checkbox"/> E. <input type="checkbox"/> W.		City, State, Zip Code <u>Superior, Wisconsin 54880</u>	
Civil Town Name _____		Facility Well No. and/or Name (If Applicable) _____ WI Unique Well No. _____	
Street Address of Well <u>N/A</u>		Reason For Abandonment <u>Completion of boring & sampling</u>	
City, Village <u>Superior, Wisconsin</u>		Date of Abandonment <u>3/11/96</u>	

WELL/DRILLHOLE/BOREHOLE INFORMATION			
(3) Original Well/Drillhole/Borehole Construction Completed On (Date) <u>3/11/96</u>		(4) Depth to Water (Feet) <u>2.2 feet</u>	
<input type="checkbox"/> Monitoring Well <input type="checkbox"/> Water Well <input type="checkbox"/> Drillhole <input checked="" type="checkbox"/> Borehole		Pump & Piping Removed? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable Liner(s) Removed? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable Screen Removed? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable Casing Left in Place? <input type="checkbox"/> Yes <input type="checkbox"/> No If No, Explain <u>N/A</u>	
Construction Report Available? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		Was Casing Cut Off Below Surface? <input type="checkbox"/> Yes <input type="checkbox"/> No Did Sealing Material Rise to Surface? <input type="checkbox"/> Yes <input type="checkbox"/> No Did Material Settle After 24 Hours? <input type="checkbox"/> Yes <input type="checkbox"/> No If Yes, Was Hole Retopped? <input type="checkbox"/> Yes <input type="checkbox"/> No <u>N/A</u>	
Construction Type: <input checked="" type="checkbox"/> Drilled <input type="checkbox"/> Driven (Sandpoint) <input type="checkbox"/> Dug <input type="checkbox"/> Other (Specify) _____		(5) Required Method of Placing Sealing Material	
Formation Type: <input checked="" type="checkbox"/> Unconsolidated Formation <input type="checkbox"/> Bedrock		<input type="checkbox"/> Conductor Pipe-Gravity <input type="checkbox"/> Conductor Pipe-Pumped <input type="checkbox"/> Dump Bailer <input checked="" type="checkbox"/> Other (Explain) <u>(Gravity feed)</u>	
Total Well Depth (ft.) _____ Casing Diameter (ins.) _____ (From ground surface)		(6) Sealing Materials	
Casing Depth (ft.) <u>N/A</u>		For monitoring wells and monitoring well boreholes only <input type="checkbox"/> Near Cement Grout <input type="checkbox"/> Sand-Cement (Concrete) Grout <input type="checkbox"/> Concrete <input checked="" type="checkbox"/> Bentonite Pellets <input type="checkbox"/> Clay-Sand Slurry <input type="checkbox"/> Granular Bentonite <input type="checkbox"/> Bentonite-Sand Slurry <input type="checkbox"/> Bentonite - Cement Grout <input type="checkbox"/> Chipped Bentonite	
Was Well Annular Space Grouted? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unknown If Yes, To What Depth? _____ Feet			

(7) Sealing Material Used	From (Ft.)	To (Ft.)	No. Yards, Sacks Sealant or Volume	(Circle One)	Mix Ratio or Mud Weight.
<u>Bentonite</u>	Surface	<u>2.5</u>	<u>.25</u>		<u>N/A</u>

(8) Comments: _____

(9) Name of Person or Firm Doing Sealing Work
Jon Hinkel - Twin Ports Testing Inc.
 Signature of Person Doing Work: Jon Hinkel Date Signed: July 18, 1996
 Street or Route: 728 Garfield Ave. Telephone Number: (218) 722-1911
 City, State, Zip Code: Duluth MN 55802

(10) FOR DNR OR COUNTY USE ONLY

Date Received/Inspected: _____	District/County: _____
Reviewer/Inspector: _____	<input type="checkbox"/> Complying Work <input type="checkbox"/> Noncomplying Work
Follow-up Necessary: _____	

All abandonment work shall be performed in accordance with the provisions of Chapters NR 111, NR 112 or NR 141, Wis. Admin. Code, whichever is applicable. Also, see instructions on back.

(1) GENERAL INFORMATION		(2) FACILITY NAME	
Well/Drillhole/Borehole Location <i>SSB-11</i>	County <i>Douglas</i>	Original Well Owner (if known)	
NE 1/4 of SE 1/4 of Sec. 10 : T. 49 N. R. 14 <input checked="" type="checkbox"/> E <input checked="" type="checkbox"/> W (if applicable)		Present Well Owner <i>Norman & Donna Camenker</i>	
Gov't Lot	Grid Number	Street or Route <i>70 Highgate Court</i>	
Grid Location ft. <input type="checkbox"/> N. <input type="checkbox"/> S. ft. <input type="checkbox"/> E. <input type="checkbox"/> W.		City, State, Zip Code <i>Superior, Wisconsin 54880</i>	
Civil Town Name		Facility Well No. and/or Name (if applicable)	WI Unique Well No.
Street Address of Well <i>N/A</i>		Reason for Abandonment <i>Completion of boring & sampling</i>	
City, Village <i>Superior, Wisconsin</i>		Date of Abandonment <i>3/11/96</i>	

WELL/DRILLHOLE/BOREHOLE INFORMATION

<p>(3) Original Well/Drillhole/Borehole Construction Completed On (Date) <u><i>3/11/96</i></u></p> <p> <input type="checkbox"/> Monitoring Well <input type="checkbox"/> Water Well <input type="checkbox"/> Drillhole <input checked="" type="checkbox"/> Borehole </p> <p>Construction Report Available? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No </p> <p>Construction Type: <input checked="" type="checkbox"/> Drilled <input type="checkbox"/> Driven (Sandpoint) <input type="checkbox"/> Dug <input type="checkbox"/> Other (Specify) _____ </p> <p>Formation Type: <input checked="" type="checkbox"/> Unconsolidated Formation <input type="checkbox"/> Bedrock </p> <p>Total Well Depth (ft.) _____ Casing Diameter (ins.) _____ (From ground surface)</p> <p>Casing Depth (ft.) <u><i>N/A</i></u></p> <p>Was Well Annular Space Grouted? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unknown If Yes, To What Depth? _____ Feet</p>	<p>(4) Depth to Water (Feet) <u><i>2.5 feet</i></u></p> <p> Pump & Piping Removed? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable Liners) Removed? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable Screen Removed? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable Casing Left in Place? <input type="checkbox"/> Yes <input type="checkbox"/> No <i>N/A</i> If No, Explain _____ </p> <p> Was Casing Cut Off Below Surface? <input type="checkbox"/> Yes <input type="checkbox"/> No Did Sealing Material Rise to Surface? <input type="checkbox"/> Yes <input type="checkbox"/> No <i>N/A</i> Did Material Settle After 24 Hours? <input type="checkbox"/> Yes <input type="checkbox"/> No If Yes, Was Hole Retopped? <input type="checkbox"/> Yes <input type="checkbox"/> No </p> <p>(5) Required Method of Placing Sealing Material</p> <p> <input type="checkbox"/> Conductor Pipe-Gravity <input type="checkbox"/> Conductor Pipe-Pumped <input type="checkbox"/> Dump Bailer <input checked="" type="checkbox"/> Other (Explain) <i>Gravity</i> </p> <p>(6) Sealing Materials For monitoring wells and monitoring well boreholes only</p> <p> <input type="checkbox"/> Neat Cement Grout <input type="checkbox"/> Sand-Cement (Concrete) Grout <input type="checkbox"/> Concrete <input type="checkbox"/> Clay-Sand Slurry <input type="checkbox"/> Bentonite-Sand Slurry <input type="checkbox"/> Chipped Bentonite </p> <p> <input checked="" type="checkbox"/> Bentonite Pellets <input type="checkbox"/> Granular Bentonite <input type="checkbox"/> Bentonite - Cement Grout </p>
--	---

(7) Sealing Material Used	From (Ft.)	To (Ft.)	No. (or) Sacks Sealant or Volume	(Circle One)	Mix Ratio or Mud Weight
<i>Bentonite</i>	Surface	<i>3</i>	<i>.25</i>		<i>N/A</i>

(8) Comments: _____

(9) Name of Person or Firm Doing Sealing Work
Jon Hinkel - Twin Ports Testing Inc.

Signature of Person Doing Work: *Jon Hinkel* Date Signed: *July 18, 1996*

Street or Route: *728 Garfield Ave.* Telephone Number: *(218) 722-1911*

City, State, Zip Code: *Duluth, MN 55812*

(10) FOR DNR OR COUNTY USE ONLY

Date Received/Inspected: _____ District/County: _____

Reviewer/Inspector: _____ Complying Work
 Noncomplying Work

Follow-up Necessary: _____

All abandonment work shall be performed in accordance with the provisions of Chapters NR 111, NR 112 or NR 141, Wis. Admin. Code, whichever is applicable. Also, see instructions on back.

(1) GENERAL INFORMATION		(2) FACILITY NAME	
Well/Drillhole/Borehole Location <i>SSB-12</i>	County <i>Douglas</i>	Original Well Owner (if known)	
NE 1/4 of SE 1/4 of Sec. <i>10</i> : T. <i>49</i> N. R. <i>14</i> <input checked="" type="checkbox"/> E <input checked="" type="checkbox"/> W (If applicable)		Present Well Owner <i>Norman & Donna Camenker</i>	
Gov't Lot	Grid Number	Street or Route <i>70 Highgate Court</i>	
Grid Location _____ ft. <input type="checkbox"/> N. <input type="checkbox"/> S. _____ ft. <input type="checkbox"/> E. <input type="checkbox"/> W.		City, State, Zip Code <i>Superior, Wisconsin 54880</i>	
Civil Town Name		Factory Well No. and/or Name (if applicable)	WI Unique Well No.
Street Address or Well <i>N/A</i>		Reason For Abandonment <i>Completion of boring & sampling</i>	
City, Village <i>Superior, Wisconsin</i>		Date of Abandonment <i>3/11/96</i>	

WELL/DRILLHOLE/BOREHOLE INFORMATION			
(3) Original Well/Drillhole/Borehole Construction Completed On (Date) <i>3/11/96</i>	Construction Report Available? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	(4) Depth to Water (Feet) <i>2.0 feet</i>	
<input type="checkbox"/> Monitoring Well <input type="checkbox"/> Water Well <input type="checkbox"/> Drillhole <input checked="" type="checkbox"/> Borehole		Pump & Piping Removed? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable Liner(s) Removed? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable Screen Removed? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable Casing Left in Place? <input type="checkbox"/> Yes <input type="checkbox"/> No If No, Explain <i>N/A</i>	
Construction Type: <input checked="" type="checkbox"/> Drilled <input type="checkbox"/> Driven (Sandpoint) <input type="checkbox"/> Dug <input type="checkbox"/> Other (Specify) _____		Was Casing Cut Off Below Surface? <input type="checkbox"/> Yes <input type="checkbox"/> No Did Sealing Material Rise to Surface? <input type="checkbox"/> Yes <input type="checkbox"/> No Did Material Settle After 24 Hours? <input type="checkbox"/> Yes <input type="checkbox"/> No If Yes, Was Hole Retopped? <input type="checkbox"/> Yes <input type="checkbox"/> No <i>N/A</i>	
Formation Type: <input checked="" type="checkbox"/> Unconsolidated Formation <input type="checkbox"/> Bedrock		(5) Required Method of Placing Sealing Material <input type="checkbox"/> Conductor Pipe-Gravity <input type="checkbox"/> Conductor Pipe-Pumped <input type="checkbox"/> Dump Bailer <input checked="" type="checkbox"/> Other (Explain) <i>Gravity</i>	
Total Well Depth (ft.) _____ Casing Diameter (ins.) _____ (From ground surface)		(6) Sealing Materials For monitoring wells and monitoring well boreholes <input type="checkbox"/> Near Cement Grout <input type="checkbox"/> Sand-Cement (Concrete) Grout <input type="checkbox"/> Concrete <input checked="" type="checkbox"/> Bentonite Pellets <input type="checkbox"/> Clay-Sand Slurry <input type="checkbox"/> Granular Bentonite <input type="checkbox"/> Bentonite-Sand Slurry <input type="checkbox"/> Bentonite - Cement Grout <input type="checkbox"/> Chipped Bentonite	
Casing Depth (ft.) _____ <i>N/A</i>			
Was Well Annular Space Grouted? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unknown If Yes, To What Depth? _____ Feet			

(7) Sealing Material Used	From (Ft.)	To (Ft.)	No. Yards, Sacks Sealant or Volume	(Circle One)	Mix Ratio or Mud Weight
<i>Bentonite</i>	<i>Surface</i>	<i>2.5</i>	<i>.25</i>		<i>N/A</i>

(8) Comments: _____

(9) Name of Person or Firm Doing Sealing Work
Jon Hinkel - Twin Ports Testing Inc.

Signature of Person Doing Work <i>Jon Hinkel</i>	Date Signed <i>July 18, 1996</i>
Street or Route <i>728 Garfield Ave.</i>	Telephone Number <i>(218) 722-1911</i>
City, State, Zip Code <i>Duluth, MN 5580</i>	

(10) FOR DNR OR COUNTY USE ONLY

Date Received/Inspected: _____	District/County: _____
Reviewer/Inspector: _____	<input type="checkbox"/> Complying Work <input type="checkbox"/> Noncomplying Work
Follow-up Necessary: _____	

All abandonment work shall be performed in accordance with the provisions of Chapters NR 111, NR 112 or NR 141, Wis. Admin. Code, whichever is applicable. Also, see instructions on back.

(1) GENERAL INFORMATION		(2) FACILITY NAME	
Well/Drillhole/Borehole Location <i>SSB-13</i>	County <i>Douglas</i>	Original Well Owner (If Known)	
NE 1/4 of SE 1/4 of Sec. 10 : T. 49 N. R. 14 <input checked="" type="checkbox"/> E <input checked="" type="checkbox"/> W (If applicable)		Present Well Owner <i>Norman & Dona Camenker</i>	
Gov't Lot _____ Grid Number _____		Street or Route <i>70 Highgate Court</i>	
Grid Location _____ ft. <input type="checkbox"/> N. <input type="checkbox"/> S. _____ ft. <input type="checkbox"/> E. <input type="checkbox"/> W.		City, State, Zip Code <i>Superior, Wisconsin 54880</i>	
Civil Town Name _____		Facility Well No. and/or Name (If Applicable) _____ WI Unique Well No. _____	
Street Address of Well <i>N/A</i>		Reason for Abandonment <i>Completion of boring & sampling</i>	
City, Village <i>Superior, Wisconsin</i>		Date of Abandonment <i>3/11/96</i>	

WELL/DRILLHOLE/BOREHOLE INFORMATION		(4) Depth to Water (Feet) <i>2.3 feet</i>	
(3) Original Well/Drillhole/Borehole Construction Completed On (Date) <i>3/11/96</i>		Pump & Piping Removed? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable Liners) Removed? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable Screen Removed? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable Casing Left in Place? <input type="checkbox"/> Yes <input type="checkbox"/> No If No, Explain <i>N/A</i>	
<input type="checkbox"/> Monitoring Well <input type="checkbox"/> Water Well <input type="checkbox"/> Drillhole <input checked="" type="checkbox"/> Borehole	Construction Report Available? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Was Casing Cut Off Below Surface? <input type="checkbox"/> Yes <input type="checkbox"/> No Did Sealing Material Rise to Surface? <input type="checkbox"/> Yes <input type="checkbox"/> No Did Material Settle After 24 Hours? <input type="checkbox"/> Yes <input type="checkbox"/> No <i>N/A</i> If Yes, Was Hole Retopped? <input type="checkbox"/> Yes <input type="checkbox"/> No	
Construction Type: <input checked="" type="checkbox"/> Drilled <input type="checkbox"/> Driven (Sandpoint) <input type="checkbox"/> Dug <input type="checkbox"/> Other (Specify) _____	(5) Required Method of Placing Sealing Material <input type="checkbox"/> Conductor Pipe-Gravity <input type="checkbox"/> Conductor Pipe-Pumped <input type="checkbox"/> Dump Bailer <input checked="" type="checkbox"/> Other (Explain) <i>Gravity Fe</i>		
Formation Type: <input checked="" type="checkbox"/> Unconsolidated Formation <input type="checkbox"/> Bedrock	(6) Sealing Materials For monitoring wells and monitoring well boreholes only <input type="checkbox"/> Near Cement Grout <input type="checkbox"/> Sand-Cement (Concrete) Grout <input type="checkbox"/> Concrete <input checked="" type="checkbox"/> Bentonite Pellets <input type="checkbox"/> Clay-Sand Slurry <input type="checkbox"/> Granular Bentonite <input type="checkbox"/> Bentonite-Sand Slurry <input type="checkbox"/> Bentonite - Cement Grout <input type="checkbox"/> Chipped Bentonite		
Total Well Depth (ft.) _____ Casing Diameter (ins.) _____ (From ground surface) Casing Depth (ft.) _____ <i>N/A</i> Was Well Annular Space Grouted? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unknown If Yes, To What Depth? _____ Feet			

(7) Sealing Material Used	From (Ft.)	To (Ft.)	No. (bags, Sacks Sealant or Volume)	(Circle One)	Mix Ratio or Mud Weight.
<i>Bentonite</i>	<i>Surface</i>	<i>2.3</i>	<i>.25</i>		

(8) Comments: _____

(9) Name of Person or Firm Doing Sealing Work
Jon Hinkel - Twin Ports Testing Inc.

Signature of Person Doing Work <i>Jon Hinkel</i>	Date Signed <i>July 18, 1996</i>
Street or Route <i>728 Garfield Ave.</i>	Telephone Number <i>(218) 722-1911</i>
City, State, Zip Code <i>Duluth, MN 55802</i>	

(10) FOR DNR OR COUNTY USE ONLY

Date Received/Inspected: _____	District/County: _____
Reviewer/Inspector: _____	<input type="checkbox"/> Complying Work <input type="checkbox"/> Noncomplying Work
Follow-up Necessary: _____	

Appendix J
Laboratory Reports



728 GARFIELD AVENUE ■ DULUTH, MINNESOTA 55802
MN (218) 722-1911 ■ FAX (218) 722-3295

LAKE SUPERIOR LABORATORIES

A DIVISION OF TWIN PORTS TESTING, INC.

Date: 12/18/95

Client: Twin Ports Testing
Environmental Dept.
728 Garfield Avenue
Duluth, MN 55802

Attn: Jon Hinkel

Phone: (218) 722-1911

Fax: (218) 722-3295

Chain of Custody #: 13243

Project: Hughitt Slip

Project ID: 552.95E

LAB ID #	SAMPLE ID
3952-95LS	SS1 (1')
3953-95LS	SS2 (1')
3954-95LS	SS3 (1')

REVISED
12/18/95

Signature _____

Linda Thiry, Director
Tim Buck, Lab Manager

Wis. Certification Number: 816057440

Minn. Certification Number: 027-137-307

This cover page is the first of _____ pages

Quality Assurance / Quality Control Report

Client: Twin Ports Testing

Chain Of Custody #: 13243

Project: Hughitt Slip

Project ID: 552.95E

QC Parameter	Blank	Soil Blank	Duplicate	Spike	Spike Duplicate	Soil Spike	Soil Spike Duplicate
DRO	NA	Pass	NA	NA	NA	Pass	Pass
PVOC	NA	Pass	NA	NA	NA	Pass	Pass
PCB'S	Pass	NA	Pass	Pass	NA	NA	NA
INORGANICS	Pass	NA	Fail	Pass	NA	NA	NA

Remarks REVISED REPORT

For Chromium : Duplicate RPD = 41.4%.

For Lead : Duplicate RPD = 56.3%.

LABORATORY ANALYSIS REPORT

Client
 Twin Ports Testing
 Environmental Dept.
 728 Garfield Avenue
 Duluth, MN 55802

Project: Hughitt Slip
Project ID: 552.95E

Collected By: Mark Darby / Mark Udd
Delivered By: Mark Darby

Chem. Lab ID	3952-95LS	3953-95LS	3954-95LS
Sample Type	Soil	Soil	Soil
Collected	08/24/95	08/24/95	08/24/95
Received	08/24/95	08/24/95	08/24/95
Reported	12/18/95	12/18/95	12/18/95
Sample Description	SS1 (1')	SS2 (1')	SS3 (1')

Analysis	Date Analyzed	MDL	3952-95LS	3953-95LS	3954-95LS
MTBE	08/28/95	50.0 ug/kg	<200 ug/kg	107 ug/kg	86.2 ug/kg
Benzene	08/28/95	50.0 ug/kg	<200 ug/kg	<100 ug/kg	88.3 ug/kg
Toluene	08/28/95	50.0 ug/kg	372 ug/kg	127 ug/kg	168 ug/kg
Ethylbenzene	08/28/95	50.0 ug/kg	<200 ug/kg	<100 ug/kg	120 ug/kg
Total Xylenes	08/28/95	50.0 ug/kg	1090 ug/kg	373 ug/kg	386 ug/kg
1,3,5 Trimethylbenzene	08/28/95	50.0 ug/kg	990 ug/kg	112 ug/kg	143 ug/kg
1,2,4 Trimethylbenzene	08/28/95	50.0 ug/kg	874 ug/kg	133 ug/kg	232 ug/kg
Lead	08/31/95	5.00 mg/kg	222 mg/kg	92.9 mg/kg	46.5 mg/kg
Moisture	08/28/95	1.00 %	15.1 %	22.7 %	30.5 %
Cadmium	09/01/95	1.000 mg/kg	ND	ND	ND
Chromium	09/01/95	5.00 mg/kg	16.1 mg/kg	65.1 mg/kg	9.05 mg/kg
Diesel Range Organics	08/25/95	5.00 mg/kg	10300 mg/kg	45.1 mg/kg	456 mg/kg
PCB's, total	08/25/95	0.024 mg/kg	ND	ND	ND

Remarks

REVISED REPORT

3952-95LS Elevated detection limit due to dilution effect.

3953-95LS Elevated detection limit due to dilution effect.

MDL ⇒ Method Detection Limit

ND ⇒ Not Detected at or above MDL



728 GARFIELD AVENUE • DULUTH, MINNESOTA 55802
 MN (218) 722-1911 • FAX (218) 722-3295

Serial Number
No 13282

**LABORATORY REQUEST AND
 CHAIN OF CUSTODY RECORD**

LAKE SUPERIOR LABORATORIES

A DIVISION OF TWIN PORTS TESTING, INC.
 561-95E. RA

Project Name Hughitt Slip Property Clean-Up No. _____ P.O.# _____

Client Mrs. Donna Camenker Report To Jon Hinkel

Address 70 Highgate Road

Superior, Wis. Bill To 561-95E. RA

Phone 392-5457 Fax _____

Remarks One 3/4 liter soil sample collected from the S51 location on the Hughitt Slip property in Superior, Wisconsin. Analysis by Lake Superior Laboratories

Sampler Signature R J Hinkel

Sampler (Print) R J Hinkel

Sample No./Location	Date	Time	Matrix			Number of Containers	Preservative	Analyses										LSL No.							
			Air	Liquid	Solid			Lead: TEL-P																	
<u>S51</u>	<u>9/12/95</u>	<u>2:10 pm</u>			<input checked="" type="checkbox"/>	<u>1</u>	<u>None</u>																		<u>4173</u>
Relinquished By <u>R. J. Hinkel</u>	Date/Time <u>9/12/95</u>	Date/Time <u>2:30 pm</u>	Received By <u>[Signature]</u>				Date/Time <u>9/12/95</u>	Relinquished By	Date/Time	Received By	Relinquished By	Date/Time	Received By												
Relinquished By	Date/Time	Date/Time	Received By				Date/Time	Relinquished By	Date/Time	Received By	Relinquished By	Date/Time	Received By												

Turnaround Time: 2 Week _____ 2-5 Day or 24 Hour Rush _____ (additional charge)



728 GARFIELD AVENUE ■ DULUTH, MINNESOTA 55802
MN (218) 722-1911 ■ FAX (218) 722-3295

A DIVISION OF TWIN PORTS TESTING, INC.

LAKE SUPERIOR LABORATORIES

Date: 12/18/95

Client: Twin Ports Testing
Environmental Dept.
728 Garfield Avenue
Duluth, MN 55802

Attn: Jon Hinkel

Phone: (218) 722-1911

Fax: (218) 722-3295

Chain of Custody #: 13367

Project: Hughitt Slip Property

Project ID: 561-95E.RA

LAB ID #	SAMPLE ID
4392-95LS	SS1A
4393-95LS	SS2A
4394-95LS	SS3Aa
4395-95LS	SS3Ab
4396-95LS	SS3Ac

REVISED
12/18/95

Signature

Linda Thiry, Director
Tim Buck, Lab Manager

Wis. Certification Number: 816057440

Minn. Certification Number: 027-137-307

This cover page is the first of _____ pages

Quality Assurance / Quality Control Report

Client: Twin Ports Testing

Chain Of Custody #: 13367

Project: Hughitt Slip Property

Project ID: 561-95E.RA

QC Parameter	Blank	Soil Blank	Duplicate	Spike	Spike Duplicate	Soil Spike	Soil Spike Duplicate
DRO	NA	Pass	NA	NA	NA	Pass	Pass
BTEX/PVOC	NA	Pass	NA	NA	NA	Pass	Pass
INORGANICS	Pass	NA	NA	Pass	NA	NA	NA

Remarks

LABORATORY ANALYSIS REPORT

Client
 Twin Ports Testing
 Environmental Dept.
 728 Garfield Avenue
 Duluth, MN 55802

Project: Hughitt Slip Property
Project ID: 561-95E.RA

Collected By: R.J. Hinkel
Delivered By: R.J. Hinkel

Chem. Lab ID	4392-95LS	4393-95LS	4394-95LS
Sample Type	Soil	Soil	Soil
Collected	09/26/95	09/26/95	09/26/95
Received	09/28/95	09/28/95	09/28/95
Reported	12/18/95	12/18/95	12/18/95
Sample Description	SS1A	SS2A	SS3Aa

Analysis	Date Analyzed	MDL	4392-95LS	4393-95LS	4394-95LS
MTBE	10/04/95	25.0 ug/kg	ND α	ND	<200 ug/kg
Benzene	10/04/95	5.00 ug/kg	ND α	ND	<25.0 ug/kg
Toluene	10/04/95	25.0 ug/kg	ND α	ND	765 ug/kg
Ethylbenzene	10/04/95	25.0 ug/kg	ND α	ND	238 ug/kg
Total Xylenes	10/04/95	75.0 ug/kg	ND α	ND	251 ug/kg
1,3,5 Trimethylbenzene	10/04/95	25.0 ug/kg	ND α	ND	1310 ug/kg
1,2,4 Trimethylbenzene	10/04/95	25.0 ug/kg	ND α	ND	8410 ug/kg
Lead	10/11/95	10.0 mg/kg	ND	ND	254 mg/kg
Moisture	10/04/95	1.00 %	17.8 %	19.0 %	24.4 %
Diesel Range Organics	09/29/95	5.00 mg/kg	5.10 mg/kg	ND	4240 mg/kg α

Remarks

REVISED REPORT

4394-95LS Elevated detection limit due to dilution effect.

MDL \Rightarrow Method Detection Limit

ND \Rightarrow Not Detected at or above MDL

α \Rightarrow Analyzed On 10/03/95

LABORATORY ANALYSIS REPORT

Client
 Twin Ports Testing
 Environmental Dept.
 728 Garfield Avenue
 Duluth, MN 55802

Project: Hughitt Slip Property
Project ID: 561-95E.RA

Collected By: R.J. Hinkel
Delivered By: R.J. Hinkel

Chem. Lab ID	4395-95LS	4396-95LS	
Sample Type	Soil	Soil	
Collected	09/26/95	09/26/95	
Received	09/28/95	09/28/95	
Reported	12/18/95	12/18/95	
Sample Description	SS3Ab	SS3Ac	

Analysis	Date Analyzed	MDL	4395-95LS	4396-95LS
MTBE	10/04/95	25.0 ug/kg	89.6 ug/kg	<200 ug/kg
Benzene	10/04/95	5.00 ug/kg	19.1 ug/kg	<10.0 ug/kg
Toluene	10/04/95	25.0 ug/kg	219 ug/kg	<200 ug/kg
Ethylbenzene	10/04/95	25.0 ug/kg	<200 ug/kg	<200 ug/kg
Total Xylenes	10/04/95	75.0 ug/kg	<200 ug/kg	<200 ug/kg
1,3,5 Trimethylbenzene	10/04/95	25.0 ug/kg	<200 ug/kg	<200 ug/kg
1,2,4 Trimethylbenzene	10/04/95	25.0 ug/kg	<200 ug/kg	<200 ug/kg
Lead	10/11/95	10.0 mg/kg	257 mg/kg	160 mg/kg
Moisture	10/04/95	1.00 %	28.2 %	27.3 %
Diesel Range Organics	09/29/95	5.00 mg/kg	11.8 mg/kg α	8.26 mg/kg

Remarks

REVISED REPORT

4395-95LS Elevated detection limit due to dilution effect.

4396-95LS Elevated detection limit due to dilution effect.

MDL \Rightarrow Method Detection Limit

ND \Rightarrow Not Detected at or above MDL

α \Rightarrow Analyzed On 10/03/95

LAKE SUPERIOR LABORATORIES

SAMPLE CONDITION UPON RECEIPT CHECKLIST

Project: Hughitt Slip Property

Client: YPT

Date Received: 9-28-95

COC #: 13367

Samples Received By: CLV

Caroleen J. Kuzel
(Signature)

- | | Yes | No |
|--|-------------------------------------|--------------------------|
| 1. Is there a chain of custody (COC) or letter stating information contained on a COC? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 2. Is the date and time relinquished in agreement with that written on the letter or COC? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 3. Do the samples received agree with the COC or accompanying paperwork (i.e. number of samples, matrices, sample tags, sample containers, analyses, etc.)? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 4. Are all the samples within the holding times for requested analyses? Communicate any lapse of greater than 4 days beyond date of collection for VOA analysis. | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 5. Are all the sample containers intact (i.e., not broken, leaking, etc.)? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 6. Did the samples arrive on ice? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| a) What temperature did the samples arrive at? | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Are the samples at the proper temperature? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 7. Is there enough sample to do all the analyses? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 8. Are the samples preserved correctly? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 9. Are the VOA vials head-space free? | <u>NA</u> | <input type="checkbox"/> |

'NO' Items Explained:



728 GARFIELD AVENUE ■ DULUTH, MINNESOTA 55802
MN (218) 722-1911 ■ FAX (218) 722-3295

A DIVISION OF TWIN PORTS TESTING, INC.

LAKE SUPERIOR LABORATORIES

Date: 09/18/95

Client: Twin Ports Testing
Environmental Dept.
728 Garfield Avenue
Duluth, MN 55802

Attn: Jon Hinkel

Phone: (218) 722-1911

Fax: (218) 722-3295

Chain of Custody #: 13282

Project: Hughitt Slip

Project ID: 561-95E.RA

LAB ID #	SAMPLE ID
4173-95LS	SS1

Signature _____

Timothy A. Buck
Linda Thiry, Director
Tim Buck, Lab Manager

Wis. Certification Number: 816057440

Minn. Certification Number: 027-137-307

This cover page is the first of _____ pages

Quality Assurance / Quality Control Report

Client: Twin Ports Testing

Chain Of Custody #: 13282

Project: Hughitt Slip

Project ID: 561-95E.RA

QC Parameter	Blank	Soil Blank	Duplicate	Spike	Spike Duplicate	Soil Spike	Soil Spike Duplicate
INORGANICS	Pass	NA	Pass	Pass	NA	NA	NA

Remarks

LABORATORY ANALYSIS REPORT

Client
 Twin Ports Testing
 Environmental Dept.
 728 Garfield Avenue
 Duluth, MN 55802

Project: Hughitt Slip
Project ID: 561-95E.RA

Collected By: R.J. Hinkel
Delivered By: R.J. Hinkel

Chem. Lab ID	4173-95LS		
Sample Type	Soil		
Collected	09/12/95		
Received	09/12/95		
Reported	09/18/95		
Sample Description	SS1		

Analysis	Date Analyzed	MDL			
TCLP Lead	09/18/95	0.250 mg/l	ND		

Remarks

MDL ⇒ Method Detection Limit
 ND ⇒ Not Detected at or above MDL

LAKE SUPERIOR LABORATORIES

SAMPLE CONDITION UPON RECEIPT CHECKLIST

Project: Hughitt Slip

Client: TPT-E

Date Received: 9/12/95

COC #: 13282

Samples Received By: H

Hanson

(Signature)

- | | Yes | No |
|--|-----------|-----------|
| 1. Is there a chain of custody (COC) or letter stating information contained on a COC? | <u>X</u> | _____ |
| 2. Is the date and time relinquished in agreement with that written on the letter or COC? | <u>X</u> | _____ |
| 3. Do the samples received agree with the COC or accompanying paperwork (i.e. number of samples, matrices, sample tags, sample containers, analyses, etc.)? | <u>X</u> | _____ |
| 4. Are all the samples within the holding times for requested analyses? Communicate any lapse of greater than 4 days beyond date of collection for VOA analysis. | <u>X</u> | _____ |
| 5. Are all the sample containers intact (i.e., not broken, leaking, etc.)? | <u>X</u> | _____ |
| 6. Did the samples arrive on ice? | | <u>NA</u> |
| a) What temperature did the samples arrive at? | <u>NA</u> | _____ |
| b) Are the samples at the proper temperature? | | <u>NA</u> |
| 7. Is there enough sample to do all the analyses? | <u>X</u> | _____ |
| 8. Are the samples preserved correctly? | <u>X</u> | _____ |
| 9. Are the VOA vials head-space free? | | <u>NA</u> |

'NO' Items Explained:



728 GARFIELD AVENUE • DULUTH, MINNESOTA 55802
 MN (218) 722-1911 • FAX (218) 722-3295

SERIAL NUMBER
 No 13869

A DIVISION OF TWIN PORTS TESTING, INC.

LABORATORY REQUEST AND
 CHAIN OF CUSTODY RECORD

LAKE SUPERIOR LABORATORIES

Project Name Hughitt Slip Property No. _____ P.O.# _____
 Client TPT Env. Dept. Report To Jon Hinkel
 Address 728 Garfield Ave.
Duluth — Bill To 599-95E-RA
 Phone _____ Fax _____

Remarks • Wisconsin Job
 • Report PVOCS in ppb units

Sampler Signature R J Hinkel
 Sampler (Print) R. J. Hinkel

Sample No./Location	Date	Time	Matrix			Number Of Containers	Preservative	Analyses										LSL No.			
			Air	Liquid	Solid			DRO	PVOC	Lead	PAH # 8310										
SSB-1	1/19/96	1:12 pm			✓			✓	✓	✓											1160
SSB-2	1/19/96	1:20 pm			✓			✓	✓	✓											1161
SSB-3	1/19/96	1:40 pm			✓			✓	✓	✓	✓										1162
SSB-4	1/19/96	2:05 pm			✓			NA	NA	NA											1163
SSB-5	1/19/96	2:15 pm			✓			NA	NA	NA											1164
SSB-6	1/19/96	2:45 pm			✓			NA	NA	NA	NA										1165
SSB-7	1/19/96	2:55 pm			✓			✓	✓	✓											1166
SSB-8	1/19/96	3:06 pm			✓			NA	NA	NA											1167
SSB-9	1/19/96	3:20 pm			✓			NA	NA	NA	NA										1168

4
 RJH

Relinquished By R J Hinkel Date/Time 1/19/96 3:55 pm Received By [Signature] Date/Time 1/19/96
 Relinquished By _____ Date/Time _____ Received By _____ Date/Time _____

Turnaround Time: 2 Week 2-5 Day _____ or 24 Hour Rush _____ (additional charge)



728 GARFIELD AVENUE • DULUTH, MINNESOTA 55802
 MN (218) 722-1911 • FAX (218) 722-3295

ER
 No 13871

A DIVISION OF TWIN PORTS TESTING, INC.

LABORATORY REQUEST AND
 CHAIN OF CUSTODY RECORD

LAKE SUPERIOR LABORATORIES

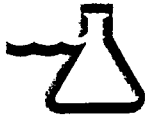
Project Name Hughitt Slip Property No. _____ P.O.# _____
 Client TPT Env. Dept. Report To Jon Hinkel
 Address 728 Garfield Ave.
Duluth - Bill To 599-95E.RA
 Phone _____ Fax _____

Remarks • Resampling of 1/19/96 event
 • Wisconsin site
 • Report PVOCS in ppb (Low Level Detection)

Sampler Signature R. J. Hinkel
 Sampler (Print) R. J. Hinkel

Sample No./Location	Date	Time	Matrix			Number of Containers	Preservative	Analyses					LSL No.				
			Air	Liquid	Solid			DRO	PVOC	Lead	PAH # 8310						
SSB-4	1/22/96	2:33 pm			✓	3		✓	✓	✓							1176
SSB-5	1/22/96	3:10 pm			✓	3		✓	✓	✓							1177
SSB-6	1/22/96	3:25 pm			✓	4		✓	✓	✓	✓						1178
SSB-8	1/22/96	3:37 pm			✓	3		✓	✓	✓							1179
SSB-9	1/22/96	4:00 pm			✓	4		✓	✓	✓	✓						1180
Relinquished By <u>R. J. Hinkel</u>	Date/Time <u>1/23/96</u>	Received By <u>[Signature]</u>	Date/Time <u>1/23/96</u>	Relinquished By	Date/Time	Received By											
Relinquished By	Date/Time	Received By	Date/Time	Relinquished By	Date/Time	Received By											

Turnaround Time: 2 Week 2-5 Day _____ or 24 Hour Rush _____ (additional charge)



728 GARFIELD AVENUE ■ DULUTH, MINNESOTA 55802
MN (218) 722-1911 ■ FAX (218) 722-3295

A DIVISION OF TWIN PORTS TESTING, INC.

LAKE SUPERIOR LABORATORIES

Date: 02/15/96

Client: Twin Ports Testing
Environmental Dept.
728 Garfield Avenue
Duluth, MN 55802

Attn: Jon Hinkel

Phone: (218) 722-1911

Fax: (218) 722-3295

Chain of Custody #: 13869

Project: Hughitt Slip Property

Project ID: 599-95E.RA

LAB ID #	SAMPLE ID
1160-96LS	SSB-1
1161-96LS	SSB-2
1162-96LS	SSB-3
1166-96LS	SSB-7

Signature _____

Timothy A. Buck
Linda Thiry, Director
Tim Buck, Lab Manager

Wis. Certification Number: 998032310

Minn. Certification Number: 027-137-307

This cover page is the first of _____ pages



728 GARFIELD AVENUE ■ DULUTH, MINNESOTA 55802
MN (218) 722-1911 ■ FAX (218) 722-3295

LAKE SUPERIOR LABORATORIES

A DIVISION OF TWIN PORTS TESTING, INC.

Date: 02/15/96

Client: Twin Ports Testing
Environmental Dept.
728 Garfield Avenue
Duluth, MN 55802

Attn: R.J. Hinkel

Phone: (218) 722-1911

Fax: (218) 722-3295

Chain of Custody #: 13871

Project: Hughitt Slip Property

Project ID: 599-95E.RA

LAB ID #	SAMPLE ID
1176-96LS	SSB-4
1177-96LS	SSB-5
1178-96LS	SSB-6
1179-96LS	SSB-8
1180-96LS	SSB-9

Signature _____

Linda Thiry, Director
Tim Buck, Lab Manager

Wis. Certification Number: 998032310

Minn. Certification Number: 027-137-307

This cover page is the first of _____ pages

LABORATORY ANALYSIS REPORT

Client
 Twin Ports Testing
 Environmental Dept.
 728 Garfield Avenue
 Duluth, MN 55802

Project: Hughitt Slip Property
Project ID: 599-95E.RA

Collected By: R.J. Hinkel
Delivered By: R.J. Hinkel

Chem. Lab ID	1160-96LS	1161-96LS	1162-96LS
Sample Type	Soil	Soil	Soil
Collected	01/19/96	01/19/96	01/19/96
Received	01/19/96	01/19/96	01/19/96
Reported	02/15/96	02/15/96	02/15/96
Sample Description	SSB-1	SSB-2	SSB-3

Analysis	Date Analyzed	MDL	1160-96LS	1161-96LS	1162-96LS
Lead	01/26/96	5.00 mg/kg	14.6 mg/kg	ND	ND
MTBE	01/30/96	25 ug/kg	98 ug/kg	ND	ND
Benzene	01/30/96	5.0 ug/kg	27 ug/kg	ND	ND
Toluene	01/30/96	25 ug/kg	77 ug/kg	ND	ND
Ethylbenzene	01/30/96	25 ug/kg	ND	ND	ND
Xylenes, Total	01/30/96	75 ug/kg	ND	ND	ND
1,3,5-Trimethylbenzene	01/30/96	25 ug/kg	ND	ND	ND
1,2,4-Trimethylbenzene	01/30/96	25 ug/kg	ND	ND	ND
Moisture	01/30/96	1.00 %	23.2 %	17.6 %	19.1 %
Diesel Range Organics	02/01/96	0.100 mg/l	ND	ND	ND

Remarks

MDL ⇒ Method Detection Limit
 ND ⇒ Not Detected at or above MDL

LABORATORY ANALYSIS REPORT

Client
 Twin Ports Testing
 Environmental Dept.
 728 Garfield Avenue
 Duluth, MN 55802

Project: Hughitt Slip Property
Project ID: 599-95E.RA

Collected By: R.J. Hinkel
Delivered By: R.J. Hinkel

Chem. Lab ID	1176-96LS	1177-96LS	1178-96LS
Sample Type	Soil	Soil	Soil
Collected	01/22/96	01/22/96	01/22/96
Received	01/23/96	01/23/96	01/23/96
Reported	02/15/96	02/15/96	02/15/96
Sample Description	SSB-4	SSB-5	SSB-6

Analysis	Date Analyzed	MDL	1176-96LS	1177-96LS	1178-96LS
MTBE	01/30/96	25 ug/kg	ND	ND	ND
Benzene	01/30/96	5.0 ug/kg	57 ug/kg	50 ug/kg	50 ug/kg
Toluene	01/30/96	25 ug/kg	94 ug/kg	81 ug/kg	84 ug/kg
Ethylbenzene	01/30/96	25 ug/kg	50 ug/kg	52 ug/kg	53 ug/kg
Xylenes, Total	01/30/96	75 ug/kg	160 ug/kg	190 ug/kg	180 ug/kg
1,3,5-Trimethylbenzene	01/30/96	25 ug/kg	36 ug/kg	47 ug/kg	43 ug/kg
1,2,4-Trimethylbenzene	01/30/96	25 ug/kg	52 ug/kg	64 ug/kg	59 ug/kg
Lead	01/26/96	5.00 mg/kg	256 mg/kg	315 mg/kg	117 mg/kg
Moisture	01/30/96	1.00 %	20.9 %	35.0 %	29.9 %
Diesel Range Organics	02/02/96	5.00 mg/kg	61.5 mg/kg	29.2 mg/kg	22.3 mg/kg

Remarks

MDL ⇒ Method Detection Limit

ND ⇒ Not Detected at or above MDL

LABORATORY ANALYSIS REPORT

Client
 Twin Ports Testing
 Environmental Dept.
 728 Garfield Avenue
 Duluth, MN 55802

Project: Hughitt Slip Property
Project ID: 599-95E.RA

Collected By: R.J. Hinkel
Delivered By: R.J. Hinkel

Chem. Lab ID

Sample Type

**Collected
 Received
 Reported**

**Sample
 Description**

1166-96LS		
Soil		
01/19/96 01/19/96 02/15/96		
SSB-7		

Analysis	Date Analyzed	MDL		
Lead	01/26/96	5.00 mg/kg	98.3 mg/kg	
MTBE	01/30/96	25 ug/kg	ND	
Benzene	01/30/96	5.0 ug/kg	ND	
Toluene	01/30/96	25 ug/kg	ND	
Ethylbenzene	01/30/96	25 ug/kg	ND	
Xylenes, Total	01/30/96	75 ug/kg	ND	
1,3,5-Trimethylbenzene	01/30/96	25 ug/kg	ND	
1,2,4-Trimethylbenzene	01/30/96	25 ug/kg	ND	
Moisture	01/30/96	1.00 %	28.9 %	
Diesel Range Organics	02/01/96	0.100 mg/l	ND	

Remarks

MDL ⇒ Method Detection Limit
 ND ⇒ Not Detected at or above MDL

LABORATORY ANALYSIS REPORT

Client
 Twin Ports Testing
 Environmental Dept.
 728 Garfield Avenue
 Duluth, MN 55802

Project: Hughitt Slip Property
Project ID: 599-95E.RA

Collected By: R.J. Hinkel
Delivered By: R.J. Hinkel

Chem. Lab ID	1179-96LS	1180-96LS	
Sample Type	Soil	Soil	
Collected	01/22/96	01/22/96	
Received	01/23/96	01/23/96	
Reported	02/15/96	02/15/96	
Sample Description	SSB-8	SSB-9	

Analysis	Date Analyzed	MDL			
MTBE	01/30/96	25 ug/kg	ND	ND	
Benzene	01/30/96	5.0 ug/kg	ND	ND	
Toluene	01/30/96	25 ug/kg	49 ug/kg	60 ug/kg	
Ethylbenzene	01/30/96	25 ug/kg	44 ug/kg	58 ug/kg	
Xylenes, Total	01/30/96	75 ug/kg	140 ug/kg	180 ug/kg	
1,3,5-Trimethylbenzene	01/30/96	25 ug/kg	39 ug/kg	53 ug/kg	
1,2,4-Trimethylbenzene	01/30/96	25 ug/kg	51 ug/kg	61 ug/kg	
Lead	01/26/96	5.00 mg/kg	115 mg/kg	321 mg/kg	
Moisture	01/30/96	1.00 %	27.2 %	53.9 %	
Diesel Range Organics	02/02/96	5.00 mg/kg	ND α	71.1 mg/kg	

Remarks

MDL \Rightarrow Method Detection Limit
 ND \Rightarrow Not Detected at or above MDL

α \Rightarrow Analyzed On 02/01/96

LABORATORY ANALYSIS REPORT

Client
 Twin Ports Testing
 Environmental Dept.
 728 Garfield Avenue
 Duluth, MN 55802

Project: Hughitt Slip Property
Project ID: 599-95E.RA

Collected By: R.J. Hinkel
Delivered By: R.J. Hinkel

Chem. Lab ID	1162-96LS		
Sample Type	Soil		
Collected	01/19/96		
Received	01/19/96		
Reported	02/15/96		
Sample Description	SSB-3		

Analysis	Date Analyzed	MDL			
Naphthalene	02/13/96	160 ug/kg	ND		
Acenaphthylene	02/13/96	240 ug/kg	ND		
Acenaphthene	02/13/96	80.0 ug/kg	ND		
Fluorene	02/13/96	80.0 ug/kg	ND		
Phenanthrene	02/13/96	12.0 ug/kg	18.6 ug/kg		
Anthracene	02/13/96	3.60 ug/kg	ND		
Fluoranthene	02/13/96	12.0 ug/kg	51.2 ug/kg		
Pyrene	02/13/96	20.0 ug/kg	60.5 ug/kg		
Benzo[a]anthracene	02/13/96	2.80 ug/kg	26.0 ug/kg		
Chrysene	02/13/96	2.80 ug/kg	36.3 ug/kg		
Benzo[b]fluoranthene	02/13/96	2.40 ug/kg	19.5 ug/kg		
Benzo[k]fluoranthene	02/13/96	2.40 ug/kg	11.6 ug/kg		
Benzo[a]pyrene	02/13/96	3.20 ug/kg	23.7 ug/kg		
Dibenzo[a,h]anthracene	02/13/96	20.0 ug/kg	<40.0 ug/kg		
Benzo[g,h,i]perylene	02/13/96	32.0 ug/kg	<64.0 ug/kg		
Indeno[1,2,3-cd]pyrene	02/13/96	8.00 ug/kg	<16.0 ug/kg		

Remarks

1162-96LS Elevated detection limit due to sample concentration.

MDL ⇒ Method Detection Limit
 ND ⇒ Not Detected at or above MDL

LABORATORY ANALYSIS REPORT

Client
 Twin Ports Testing
 Environmental Dept.
 728 Garfield Avenue
 Duluth, MN 55802

Project: Hughitt Slip Property
Project ID: 599-95E.RA

Collected By: R.J. Hinkel
Delivered By: R.J. Hinkel

Chem. Lab ID	1178-96LS	1180-96LS	
Sample Type	Soil	Soil	
Collected	01/22/96	01/22/96	
Received	01/23/96	01/23/96	
Reported	02/15/96	02/15/96	
Sample Description	SSB-6	SSB-9	

Analysis	Date Analyzed	MDL		
Naphthalene	02/14/96	160 ug/kg	ND	ND
Acenaphthylene	02/14/96	240 ug/kg	ND	ND
Acenaphthene	02/14/96	80.0 ug/kg	419 ug/kg	859 ug/kg
Fluorene	02/14/96	80.0 ug/kg	ND	ND
Phenanthrene	02/14/96	12.0 ug/kg	223 ug/kg	713 ug/kg
Anthracene	02/14/96	3.60 ug/kg	32.4 ug/kg	80.7 ug/kg
Fluoranthene	02/14/96	12.0 ug/kg	447 ug/kg	1120 ug/kg
Pyrene	02/14/96	20.0 ug/kg	503 ug/kg	1290 ug/kg
Benzo[a]anthracene	02/14/96	2.80 ug/kg	156 ug/kg	421 ug/kg
Chrysene	02/14/96	2.80 ug/kg	235 ug/kg	618 ug/kg
Benzo[b]fluoranthene	02/14/96	2.40 ug/kg	117 ug/kg	249 ug/kg
Benzo[k]fluoranthene	02/14/96	2.40 ug/kg	61.4 ug/kg	146 ug/kg
Benzo[a]pyrene	02/14/96	3.20 ug/kg	134 ug/kg	387 ug/kg
Dibenzo[a,h]anthracene	02/14/96	20.0 ug/kg	<200 ug/kg	<400 ug/kg
Benzo[g,h,i]perylene	02/14/96	32.0 ug/kg	<320 ug/kg	<640 ug/kg
Indeno[1,2,3-cd]pyrene	02/14/96	8.00 ug/kg	<80.0 ug/kg	<160 ug/kg

Remarks

WI DNR Laboratory Certification #999446800

1178-96LS Elevated detection limit due to sample concentration.

1180-96LS Elevated detection limit due to sample concentration.

MDL ⇒ Method Detection Limit

ND ⇒ Not Detected at or above MDL

LAKE SUPERIOR LABORATORIES

SAMPLE CONDITION UPON RECEIPT CHECKLIST

Project: High H Slip

Client: TPT-E

Date Received: 1/19/96

COC #: 13869

Samples Received By: 4

Z. Hanson
(Signature)

- | | Yes | No |
|--|------------|-------------|
| 1. Is there a chain of custody (COC) or letter stating information contained on a COC? | <u>X</u> | <u> </u> |
| 2. Is the date and time relinquished in agreement with that written on the letter or COC? | <u>X</u> | <u> </u> |
| 3. Do the samples received agree with the COC or accompanying paperwork (i.e. number of samples, matrices, sample tags, sample containers, analyses, etc.)? | <u>X</u> | <u> </u> |
| 4. Are all the samples within the holding times for requested analyses? Communicate any lapse of greater than 4 days beyond date of collection for VOA analysis. | <u>X</u> | <u> </u> |
| 5. Are all the sample containers intact (i.e., not broken, leaking, etc.)? | <u>X</u> | <u> </u> |
| 6. Did the samples arrive on ice? | <u>X</u> | <u> </u> |
| a) What temperature did the samples arrive at? | <u>201</u> | <u> </u> |
| b) Are the samples at the proper temperature? | <u>201</u> | <u> </u> |
| 7. Is there enough sample to do all the analyses? | <u>X</u> | <u> </u> |
| 8. Are the samples preserved correctly? | <u>X</u> | <u> </u> |
| 9. Are the VOA vials head-space free? | <u>NA</u> | <u> </u> |

'NO' Items Explained:

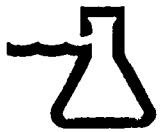
LAKE SUPERIOR LABORATORIES

SAMPLE CONDITION UPON RECEIPT CHECKLIST

Project: Hugh. 4 Slip Property
Client: TPT-E
Date Received: 1/23/96
COC #: 13871
Samples Received By: 4
L. Hanson
(Signature)

- | | Yes | No |
|--|-------------|-------------|
| 1. Is there a chain of custody (COC) or letter stating information contained on a COC? | <u>X</u> | <u> </u> |
| 2. Is the date and time relinquished in agreement with that written on the letter or COC? | <u>X</u> | <u> </u> |
| 3. Do the samples received agree with the COC or accompanying paperwork (i.e. number of samples, matrices, sample tags, sample containers, analyses, etc.)? | <u>X</u> | <u> </u> |
| 4. Are all the samples within the holding times for requested analyses? Communicate any lapse of greater than 4 days beyond date of collection for VOA analysis. | <u>X</u> | <u> </u> |
| 5. Are all the sample containers intact (i.e., not broken, leaking, etc.)? | <u>X</u> | <u> </u> |
| 6. Did the samples arrive on ice? | | <u>ROI</u> |
| a) What temperature did the samples arrive at? | <u>1.4C</u> | |
| b) Are the samples at the proper temperature? | | <u>ROI</u> |
| 7. Is there enough sample to do all the analyses? | <u>X</u> | <u> </u> |
| 8. Are the samples preserved correctly? | <u>X</u> | <u> </u> |
| 9. Are the VOA vials head-space free? | | <u>NA</u> |

'NO' Items Explained:



728 GARFIELD AVENUE • DULUTH, MINNESOTA 55802
MN (218) 722-1911 • FAX (218) 722-3295

A DIVISION OF TWIN PORTS TESTING, INC.

SERIAL NUMBER

No. 14301

LABORATORY REQUEST AND
CHAIN OF CUSTODY RECORD

LAKE SUPERIOR LABORATORIES

Project Name Hughitt Slip Property No. _____ P.O.# _____

Client TPT Env. Dept. Report To Jan Hinkel

Address Duluth office

Bill To 599-95E.RA

Phone _____ Fax _____

Sampler Signature R. J. Hinkel

Sampler (Print) R. J. Hinkel

Remarks

Sample No./Location	Date	Time	Matrix			Number of Containers	Preservative	Analyses										LSL No.				
			Air	Liquid	Solid			VOC	Lead	PAH												
SSB-10	3-11-96	12:45 pm			✓	4		✓	✓	✓												1478
SSB-11	3-11-96	2:00 pm			✓	4		✓	✓	✓												1479
SSB-12	3-11-96	2:45 pm			✓	4		✓	✓	✓												1480
SSA-13	3-11-96	3:15 pm			✓	2				✓												1481
Relinquished By <u>R. J. Hinkel 4:00pm</u>		Date/Time <u>3-11-96</u>	Received By <u>L. Hanson</u>				Relinquished By		Date/Time		Received By											
Relinquished By		Date/Time	Received By				Relinquished By		Date/Time		Received By											

Turnaround Time: 2 Week 2-5 Day _____ or 24 Hour Rush _____ (additional charge)



728 GARFIELD AVENUE ■ DULUTH, MINNESOTA 55802
MN (218) 722-1911 ■ FAX (218) 722-3295

A DIVISION OF TWIN PORTS TESTING, INC.

LAKE SUPERIOR LABORATORIES

Date: 03/26/96

Client: Twin Ports Testing
Environmental Dept.
728 Garfield Avenue
Duluth, MN 55802

Attn: Jon Hinkel

Phone: (218) 722-1911

Fax: (218) 722-3295

Chain of Custody #: 14301

Project: Hughitt Slip Property

Project ID: 599-95E.RA

LAB ID #	SAMPLE ID
1478-96LS	SSB-10
1479-96LS	SSB-11
1480-96LS	SSB-12
1481-96LS	SSB-13

Signature

Linda Thiry, Director
Tim Buck, Lab Manager

Wis. Certification Number: 998032310

Minn. Certification Number: 027-137-307

This cover page is the first of _____ pages

LABORATORY ANALYSIS REPORT

Client
 Twin Ports Testing
 Environmental Dept.
 728 Garfield Avenue
 Duluth, MN 55802

Chem. Lab ID: 1478-96LS
Project: Hughitt Slip Property
Project ID: 599-95E.RA

Collected By: R.J. Hinkel
Delivered By: R.J. Hinkel
Sample Type: Soil
Collected: 03/11/96
Received: 03/11/96
Analyzed: 03/11/96
Reported: 03/26/96

Sample Description
 SSB-10

Analysis EPA 8021

Dichlorodifluoromethane	<25 ug/kg	1,1,2,2-Tetrachloroethane	<25 ug/kg
Chloromethane	<25 ug/kg	1,2,3-Trichloropropane	<25 ug/kg
Vinyl Chloride	<25 ug/kg	n-Propylbenzene	<25 ug/kg
Bromomethane	<25 ug/kg	Bromobenzene	<25 ug/kg
Chloroethane	<25 ug/kg	1,3,5-Trimethylbenzene	<25 ug/kg
Trichlorofluoromethane	<25 ug/kg	2-Chlorotoluene	<25 ug/kg
1,1-Dichloroethene	<25 ug/kg	4-Chlorotoluene	<25 ug/kg
Methylene Chloride	<25 ug/kg	tert-Butylbenzene	<25 ug/kg
trans-1,2-Dichloroethene	<25 ug/kg	1,2,4-Trimethylbenzene	26 ug/kg
1,1-Dichloroethane	<25 ug/kg	sec-Butylbenzene	26 ug/kg
2,2-Dichloropropane	<25 ug/kg	p-Isopropyltoluene	<25 ug/kg
cis-1,2-Dichloroethene	<25 ug/kg	1,3-Dichlorobenzene	<25 ug/kg
Chloroform	<25 ug/kg	1,4-Dichlorobenzene	<25 ug/kg
Bromochloromethane	<25 ug/kg	n-Butylbenzene	49 ug/kg
1,1,1-Trichloroethane	<25 ug/kg	1,2-Dichlorobenzene	<25 ug/kg
1,1-Dichloropropene	<25 ug/kg	1,2-Dibromo-3-chloropropane	<25 ug/kg
Carbon Tetrachloride	<25 ug/kg	1,2,4-Trichlorobenzene	<25 ug/kg
Benzene	<5.0 ug/kg	Hexachlorobutadiene	<25 ug/kg
1,2-Dichloroethane	<25 ug/kg	Naphthalene	37 ug/kg
Trichloroethene	<25 ug/kg	1,2,3-Trichlorobenzene	35 ug/kg
1,2-Dichloropropane	<25 ug/kg	Lead	216000 ug/kg
Bromodichloromethane	<25 ug/kg	Moisture	31.50 %
Dibromomethane	<25 ug/kg		
Toluene	<25 ug/kg		
1,1,2-Trichloroethane	<25 ug/kg		
1,3-Dichloropropane	<25 ug/kg		
Tetrachloroethene	<25 ug/kg		
Dibromochloromethane	<25 ug/kg		
1,2-Dibromoethane	<25 ug/kg		
Chlorobenzene	<25 ug/kg		
Ethylbenzene	<25 ug/kg		
1,1,1,2-Tetrachloroethane	<25 ug/kg		
m- & p-Xylene	<50 ug/kg		
o-Xylene	<25 ug/kg		
Styrene	<25 ug/kg		
Isopropylbenzene	<25 ug/kg		
Bromoform	<25 ug/kg		

Remarks

Lead: date analyzed 03/22/96.

LABORATORY ANALYSIS REPORT

Client
Twin Ports Testing
Environmental Dept.
728 Garfield Avenue
Duluth, MN 55802

Chem. Lab ID: 1479-96LS
Project: Hughitt Slip Property
Project ID: 599-95E.RA

Collected By: R.J. Hinkel
Delivered By: R.J. Hinkel
Sample Type: Soil
Collected: 03/11/96
Received: 03/11/96
Analyzed: 03/11/96
Reported: 03/26/96

Sample Description
SSB-11

Analysis EPA 8021

Dichlorodifluoromethane	<25 ug/kg	1,1,2,2-Tetrachloroethane	<25 ug/kg
Chloromethane	<25 ug/kg	1,2,3-Trichloropropane	<25 ug/kg
Vinyl Chloride	<25 ug/kg	n-Propylbenzene	<25 ug/kg
Bromomethane	<25 ug/kg	Bromobenzene	<25 ug/kg
Chloroethane	<25 ug/kg	1,3,5-Trimethylbenzene	<25 ug/kg
Trichlorofluoromethane	<25 ug/kg	2-Chlorotoluene	<25 ug/kg
1,1-Dichloroethene	<25 ug/kg	4-Chlorotoluene	<25 ug/kg
Methylene Chloride	<25 ug/kg	tert-Butylbenzene	<25 ug/kg
trans-1,2-Dichloroethene	<25 ug/kg	1,2,4-Trimethylbenzene	<25 ug/kg
1,1-Dichloroethane	<25 ug/kg	sec-Butylbenzene	<25 ug/kg
2,2-Dichloropropane	<25 ug/kg	p-Isopropyltoluene	<25 ug/kg
cis-1,2-Dichloroethene	<25 ug/kg	1,3-Dichlorobenzene	<25 ug/kg
Chloroform	<25 ug/kg	1,4-Dichlorobenzene	<25 ug/kg
Bromochloromethane	<25 ug/kg	n-Butylbenzene	35 ug/kg
1,1,1-Trichloroethane	<25 ug/kg	1,2-Dichlorobenzene	<25 ug/kg
1,1-Dichloropropene	<25 ug/kg	1,2-Dibromo-3-chloropropane	<25 ug/kg
Carbon Tetrachloride	<25 ug/kg	1,2,4-Trichlorobenzene	40 ug/kg
Benzene	<5.0 ug/kg	Hexachlorobutadiene	<25 ug/kg
1,2-Dichloroethane	<25 ug/kg	Naphthalene	<25 ug/kg
Trichloroethene	<25 ug/kg	1,2,3-Trichlorobenzene	<25 ug/kg
1,2-Dichloropropane	<25 ug/kg	Lead	<5000 ug/kg
Bromodichloromethane	<25 ug/kg	Moisture	19.80 %
Dibromomethane	<25 ug/kg		
Toluene	<25 ug/kg		
1,1,2-Trichloroethane	<25 ug/kg		
1,3-Dichloropropane	<25 ug/kg		
Tetrachloroethene	<25 ug/kg		
Dibromochloromethane	<25 ug/kg		
1,2-Dibromoethane	<25 ug/kg		
Chlorobenzene	<25 ug/kg		
Ethylbenzene	<25 ug/kg		
1,1,1,2-Tetrachloroethane	<25 ug/kg		
m- & p-Xylene	<50 ug/kg		
o-Xylene	<25 ug/kg		
Styrene	<25 ug/kg		
Isopropylbenzene	<25 ug/kg		
Bromoform	<25 ug/kg		

Remarks

Lead: date analyzed 03/22/96.

LABORATORY ANALYSIS REPORT

Client
Twin Ports Testing
Environmental Dept.
728 Garfield Avenue
Duluth, MN 55802

Chem. Lab ID: 1480-96LS
Project: Hughitt Slip Property
Project ID: 599-95E.RA

Collected By: R.J. Hinkel
Delivered By: R.J. Hinkel
Sample Type: Soil

Collected: 03/11/96
Received: 03/11/96
Analyzed: 03/11/96
Reported: 03/26/96

Sample Description
SSB-12

Analysis EPA 8021

Dichlorodifluoromethane	<25 ug/kg	1,1,2,2-Tetrachloroethane	<25 ug/kg
Chloromethane	<25 ug/kg	1,2,3-Trichloropropane	<25 ug/kg
Vinyl Chloride	<25 ug/kg	n-Propylbenzene	<25 ug/kg
Bromomethane	<25 ug/kg	Bromobenzene	<25 ug/kg
Chloroethane	<25 ug/kg	1,3,5-Trimethylbenzene	<25 ug/kg
Trichlorofluoromethane	<25 ug/kg	2-Chlorotoluene	<25 ug/kg
1,1-Dichloroethene	<25 ug/kg	4-Chlorotoluene	<25 ug/kg
Methylene Chloride	<25 ug/kg	tert-Butylbenzene	<25 ug/kg
trans-1,2-Dichloroethene	<25 ug/kg	1,2,4-Trimethylbenzene	<25 ug/kg
1,1-Dichloroethane	<25 ug/kg	sec-Butylbenzene	<25 ug/kg
2,2-Dichloropropane	<25 ug/kg	p-Isopropyltoluene	<25 ug/kg
cis-1,2-Dichloroethene	<25 ug/kg	1,3-Dichlorobenzene	<25 ug/kg
Chloroform	<25 ug/kg	1,4-Dichlorobenzene	<25 ug/kg
Bromochloromethane	<25 ug/kg	n-Butylbenzene	42 ug/kg
1,1,1-Trichloroethane	<25 ug/kg	1,2-Dichlorobenzene	<25 ug/kg
1,1-Dichloropropene	<25 ug/kg	1,2-Dibromo-3-chloropropane	<25 ug/kg
Carbon Tetrachloride	<25 ug/kg	1,2,4-Trichlorobenzene	48 ug/kg
Benzene	<5.0 ug/kg	Hexachlorocyclopentadiene	<25 ug/kg
1,2-Dichloroethane	<25 ug/kg	Naphthalene	26 ug/kg
Trichloroethene	<25 ug/kg	1,2,3-Trichlorobenzene	27 ug/kg
1,2-Dichloropropane	<25 ug/kg	Lead	78500 ug/kg
Bromodichloromethane	<25 ug/kg	Moisture	28.10 %
Dibromomethane	<25 ug/kg		
Toluene	<25 ug/kg		
1,1,2-Trichloroethane	<25 ug/kg		
1,3-Dichloropropane	<25 ug/kg		
Tetrachloroethene	<25 ug/kg		
Dibromochloromethane	<25 ug/kg		
1,2-Dibromoethane	<25 ug/kg		
Chlorobenzene	<25 ug/kg		
Ethylbenzene	<25 ug/kg		
1,1,1,2-Tetrachloroethane	<25 ug/kg		
m- & p-Xylene	<50 ug/kg		
o-Xylene	<25 ug/kg		
Styrene	<25 ug/kg		
Isopropylbenzene	<25 ug/kg		
Bromoform	<25 ug/kg		

Remarks

Lead: date analyzed 03/22/96.

LABORATORY ANALYSIS REPORT

Client
 Twin Ports Testing
 Environmental Dept.
 728 Garfield Avenue
 Duluth, MN 55802

Project: Hughitt Slip Property
Project ID: 599-95E.RA

Collected By: R.J. Hinkel
Delivered By: R.J. Hinkel

Chem. Lab ID	1478-96LS	1479-96LS	1480-96LS
Sample Type	Soil	Soil	Soil
Collected	03/11/96	03/11/96	03/11/96
Received	03/11/96	03/11/96	03/11/96
Reported	03/26/96	03/26/96	03/26/96
Sample Description	SSB-10	SSB-11	SSB-12

Analysis	Date Analyzed	RL	1478-96LS	1479-96LS	1480-96LS
Acenaphthene	03/19/96	5.70 ug/kg	ND	ND	ND
Acenaphthylene	03/19/96	1.20 ug/kg	ND	ND	ND
Anthracene	03/19/96	9.00 ug/kg	473 ug/kg	ND	93.0 ug/kg
Benzo[a]anthracene	03/19/96	4.00 ug/kg	708 ug/kg	ND	392 ug/kg
Benzo[a]pyrene	03/19/96	4.00 ug/kg	892 ug/kg	8.87 ug/kg	610 ug/kg
Benzo[b]fluoranthene	03/19/96	2.20 ug/kg	734 ug/kg	7.35 ug/kg	476 ug/kg
Benzo[k]fluoranthene	03/19/96	1.70 ug/kg	270 ug/kg	3.47 ug/kg	172 ug/kg
Benzo[g,h,i]perylene	03/19/96	4.50 ug/kg	ND	ND	302 ug/kg
Chrysene	03/19/96	1.70 ug/kg	ND	ND	508 ug/kg
Dibenzo[a,h]anthracene	03/19/96	6.20 ug/kg	ND	ND	ND
Fluoranthene	03/19/96	6.20 ug/kg	2250 ug/kg	25.3 ug/kg	1530 ug/kg
Fluorene	03/19/96	3.40 ug/kg	255 ug/kg	ND	ND
Indeno[1,2,3-cd]pyrene	03/19/96	6.70 ug/kg	501 ug/kg	ND	353 ug/kg
1-Methyl Naphthalene	03/19/96	1.20 ug/kg	191 ug/kg	9.50 ug/kg	ND
2-Methyl Naphthalene	03/19/96	3.40 ug/kg	ND	ND	ND
Naphthalene	03/19/96	1.70 ug/kg	401 ug/kg	5.17 ug/kg	60.9 ug/kg
Phenanthrene	03/19/96	6.70 ug/kg	1890 ug/kg	28.5 ug/kg	275 ug/kg
Pyrene	03/19/96	5.00 ug/kg	2400 ug/kg	ND	964 ug/kg

Remarks

RL ⇒ Reporting Limit
 ND ⇒ Not Detected at or above RL

LABORATORY ANALYSIS REPORT

Client

Twin Ports Testing
 Environmental Dept.
 728 Garfield Avenue
 Duluth, MN 55802

Project: Hughitt Slip Property
Project ID: 599-95E.RA

Collected By: R.J. Hinkel
Delivered By: R.J. Hinkel

Chem. Lab ID

1481-96LS

Sample Type

Soil

**Collected
 Received
 Reported**

03/11/96
 03/11/96
 03/26/96

**Sample
 Description**

SSB-13

Analysis	Date Analyzed	RL	
Acenaphthene	03/19/96	5.70 ug/kg	ND
Acenaphthylene	03/19/96	1.20 ug/kg	ND
Anthracene	03/19/96	9.00 ug/kg	ND
Benzo[a]anthracene	03/19/96	4.00 ug/kg	8.29 ug/kg
Benzo[a]pyrene	03/19/96	4.00 ug/kg	16.3 ug/kg
Benzo[b]fluoranthene	03/19/96	2.20 ug/kg	14.5 ug/kg
Benzo[k]fluoranthene	03/19/96	1.70 ug/kg	6.96 ug/kg
Benzo[g,h,i]perylene	03/19/96	4.50 ug/kg	4.29 ug/kg
Chrysene	03/19/96	1.70 ug/kg	ND
Dibenzo[a,h]anthracene	03/19/96	6.20 ug/kg	ND
Fluoranthene	03/19/96	6.20 ug/kg	46.7 ug/kg
Fluorene	03/19/96	3.40 ug/kg	ND
Indeno[1,2,3-cd]pyrene	03/19/96	6.70 ug/kg	7.10 ug/kg
1-Methyl Naphthalene	03/19/96	1.20 ug/kg	16.3 ug/kg
2-Methyl Naphthalene	03/19/96	3.40 ug/kg	ND
Naphthalene	03/19/96	1.70 ug/kg	9.50 ug/kg
Phenanthrene	03/19/96	6.70 ug/kg	40.6 ug/kg
Pyrene	03/19/96	5.00 ug/kg	ND

Remarks

RL ⇒ Reporting Limit
 ND ⇒ Not Detected at or above RL

LAKE SUPERIOR LABORATORIES

SAMPLE CONDITION UPON RECEIPT CHECKLIST

Project: Hughitt Slip

Client: TPT-E

Date Received: 3/11/96

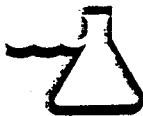
COC #: 14301

Samples Received By: 4

L. Hanson
(Signature)

- | | Yes | No |
|--|----------|------------|
| 1. Is there a chain of custody (COC) or letter stating information contained on a COC? | <u>X</u> | _____ |
| 2. Is the date and time relinquished in agreement with that written on the letter or COC? | <u>X</u> | _____ |
| 3. Do the samples received agree with the COC or accompanying paperwork (i.e. number of samples, matrices, sample tags, sample containers, analyses, etc.)? | <u>X</u> | _____ |
| 4. Are all the samples within the holding times for requested analyses? Communicate any lapse of greater than 4 days beyond date of collection for VOA analysis. | <u>X</u> | _____ |
| 5. Are all the sample containers intact (i.e., not broken, leaking, etc.)? | <u>X</u> | _____ |
| 6. Did the samples arrive on ice? | | <u>LOI</u> |
| a) What temperature did the samples arrive at? | | <u>LOI</u> |
| b) Are the samples at the proper temperature? | | <u>LOI</u> |
| 7. Is there enough sample to do all the analyses? | <u>X</u> | _____ |
| 8. Are the samples preserved correctly? | <u>X</u> | _____ |
| 9. Are the VOA vials head-space free? | | <u>NA</u> |

'NO' Items Explained:



728 GARFIELD AVENUE ■ DULUTH, MINNESOTA 55802
MN (218) 722-1911 ■ FAX (218) 722-3295

A DIVISION OF TWIN PORTS TESTING, INC.

LAKE SUPERIOR LABORATORIES

Date: 01/30/96

Client: Twin Ports Testing
Environmental Dept.
728 Garfield Avenue
Duluth, MN 55802

Attn: Jon Hinkel

Phone: (218) 722-1911

Fax: (218) 722-3295

Chain of Custody #: 13866

Project: Hughitt Slip Property

Project ID: 599-95E.RA

LAB ID #	SAMPLE ID
1169-96LS	WS-1

Signature _____

Timothy A. Buck
Linda Thiry, Director
Tim Buck, Lab Manager

Wis. Certification Number: 998032310

Minn. Certification Number: 027-137-307

This cover page is the first of _____ pages

LABORATORY ANALYSIS REPORT

Client
 Twin Ports Testing
 Environmental Dept.
 728 Garfield Avenue
 Duluth, MN 55802

Project: Hughitt Slip Property
Project ID: 599-95E.RA

Collected By: R.J. Hinkel
Delivered By: R.J. Hinkel

Chem. Lab ID	1169-96LS		
Sample Type	Water		
Collected	01/17/96		
Received	01/19/96		
Reported	01/30/96		
Sample Description	WS-1		

Analysis	Date Analyzed	MDL			
Diesel Range Organics	01/24/96	0.100 mg/l	0.492 mg/l		
Gasoline Range Organics	01/30/96	0.100 mg/l	ND		
Benzene	01/30/96	0.005 mg/l	ND		
Toluene	01/30/96	0.005 mg/l	ND		
Ethylbenzene	01/30/96	0.005 mg/l	ND		
Xylenes, Total	01/30/96	0.015 mg/l	ND		
Lead	01/20/96	0.400 mg/l	ND		

Remarks

DRO: Duplicate diesel component spike recovery = 119.3%. Method blank recovery = 0.135mg/l.

MDL ⇒ Method Detection Limit
 ND ⇒ Not Detected at or above MDL

LAKE SUPERIOR LABORATORIES

SAMPLE CONDITION UPON RECEIPT CHECKLIST

Project: Hughitt Slip

Client: TPT E

Date Received: 1/19/96

COC #: 13866

Samples Received By: 41

L. J. Janson
(Signature)

- | | Yes | No |
|--|----------------------|----------------------------|
| 1. Is there a chain of custody (COC) or letter stating information contained on a COC? | <u>X</u> | <u> </u> |
| 2. Is the date and time relinquished in agreement with that written on the letter or COC? | <u>X</u> | <u> </u> |
| 3. Do the samples received agree with the COC or accompanying paperwork (i.e. number of samples, matrices, sample tags, sample containers, analyses, etc.)? | <u>X</u> | <u> </u> |
| 4. Are all the samples within the holding times for requested analyses? Communicate any lapse of greater than 4 days beyond date of collection for VOA analysis. | <u>X</u> | <u> </u> |
| 5. Are all the sample containers intact (i.e., not broken, leaking, etc.)? | <u>X</u> | <u> </u> |
| 6. Did the samples arrive on ice?
a) What temperature did the samples arrive at? <u>2.1C</u>
b) Are the samples at the proper temperature? | <u>X</u>
<u>X</u> | <u> </u>
<u> </u> |
| 7. Is there enough sample to do all the analyses? | <u>X</u> | <u> </u> |
| 8. Are the samples preserved correctly? | <u>X</u> | <u> </u> |
| 9. Are the VOA vials head-space free? | <u>X</u> | <u> </u> |

'NO' Items Explained:



728 GARFIELD AVENUE • DULUTH, MINNESOTA 55802
 MN (218) 722-1911 • FAX (218) 722-3295

A DIVISION OF TWIN PORTS TESTING, INC.

SEPTAL NUMBER 11

No 14018

LABORATORY REQUEST AND
 CHAIN OF CUSTODY RECORD

LAKE SUPERIOR LABORATORIES

Project Name Hughitt Slip Property No. _____ P.O.# _____

Client Twin Ports Testing Report To Jon Hinkel

Address _____

Bill To 599-95E, RA

Phone _____ Fax _____

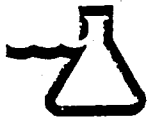
Sampler Signature R J Hinkel

Sampler (Print) R J Hinkel

Remarks
 Wisconsin Job; low level detection
 required.
 Note: VOC vial marked "X" experienced
 spillage in the field.

Sample No./Location	Date	Time	Matrix			Number of Containers	Preservative	Analyses					LSL No.				
			Air	Liquid	Solid			DRO	VOC	PAH (E310)	Lead						
WS-2	5/30/96	3:45 pm		✓		6		✓	✓	✓	✓						2167
Field Blank	5/30/96	3:45 pm		✓		3		✓	✓								2162
Trip Blank	-	-		✓		1		✓									2163
Relinquished By <u>R. J. Hinkel</u>	Date/Time <u>5-31-96 8:15</u>	Received By <u>A. Anderson</u>			Date/Time <u>5/31/96</u>	Relinquished By	Date/Time	Received By									
Relinquished By	Date/Time	Received By			Date/Time	Relinquished By	Date/Time	Received By									

Turnaround Time: 2 Week 2-5 Day _____ or 24 Hour Rush _____ (additional charge)



728 GARFIELD AVENUE ■ DULUTH, MINNESOTA 55802
MN (218) 722-1911 ■ FAX (218) 722-3295

LAKE SUPERIOR LABORATORIES

A DIVISION OF TWIN PORTS TESTING, INC.

Date: 06/24/96

Client: Twin Ports Testing
Environmental Dept.
728 Garfield Avenue
Duluth, MN 55802

Attn: Jon Hinkel

Phone: (218) 722-1911

Fax: (218) 722-3295

Chain of Custody #: 14018

Project: Hughitt Slip Property

Project ID: 599-95E.RA

LAB ID #	SAMPLE ID
2161-96LS	WS-2
2162-96LS	Field Blank
2163-96LS	Trip Blank

Signature _____

Linda Thiry
Linda Thiry, Director
Tim Buck, Lab Manager

Wis. Certification Number: 998032310

Minn. Certification Number: 027-137-307

This cover page is the first of _____ pages

LABORATORY ANALYSIS REPORT

Client
 Twin Ports Testing
 Environmental Dept.
 728 Garfield Avenue
 Duluth, MN 55802

Chem. Lab ID: 2161-96LS
Project: Hughitt Slip Property
Project ID: 599-95E.RA

Collected By: R.J. Hinkel
Delivered By: R.J. Hinkel
Sample Type: Water
Collected: 05/30/96
Received: 05/31/96
Analyzed: 06/06/96
Reported: 06/24/96

Sample Description
 WS-2

Analysis EPA 8021

Dichlorodifluoromethane	<1.0 ug/l	1,1,2,2-Tetrachloroethane	<1.0 ug/l
Chloromethane	<1.0 ug/l	1,2,3-Trichloropropane	<1.0 ug/l
Vinyl Chloride	<1.0 ug/l	n-Propylbenzene	<1.0 ug/l
Bromomethane	<1.0 ug/l	Bromobenzene	<1.0 ug/l
Chloroethane	<1.0 ug/l	1,3,5-Trimethylbenzene	<1.0 ug/l
Trichlorofluoromethane	<1.0 ug/l	2-Chlorotoluene	<1.0 ug/l
1,1-Dichloroethene	<1.0 ug/l	4-Chlorotoluene	<1.0 ug/l
Methylene Chloride	<1.0 ug/l	tert-Butylbenzene	<1.0 ug/l
trans-1,2-Dichloroethene	<1.0 ug/l	1,2,4-Trimethylbenzene	<1.0 ug/l
1,1-Dichloroethane	<1.0 ug/l	sec-Butylbenzene	<1.0 ug/l
2,2-Dichloropropane	<1.0 ug/l	p-isopropyltoluene	<1.0 ug/l
cis-1,2-Dichloroethene	<1.0 ug/l	1,3-Dichlorobenzene	<1.0 ug/l
Chloroform	<1.0 ug/l	1,4-Dichlorobenzene	<1.0 ug/l
Bromochloromethane	<1.0 ug/l	n-Butylbenzene	1.4 ug/l
1,1,1-Trichloroethane	<1.0 ug/l	1,2-Dichlorobenzene	<1.0 ug/l
1,1-Dichloropropene	<1.0 ug/l	1,2-Dibromo-3-chloropropane	<1.0 ug/l
Carbon Tetrachloride	<1.0 ug/l	1,2,4-Trichlorobenzene	<1.0 ug/l
Benzene	<1.0 ug/l	Hexachlorobutadiene	<1.0 ug/l
1,2-Dichloroethane	<1.0 ug/l	Naphthalene	3.0 ug/l
Trichloroethene	<1.0 ug/l	1,2,3-Trichlorobenzene	<1.0 ug/l
1,2-Dichloropropane	<1.0 ug/l	Diesel Range Organics	113 ug/l
Bromodichloromethane	<1.0 ug/l	Lead	11.1 ug/l
Dibromomethane	<1.0 ug/l		
Toluene	<1.0 ug/l		
1,1,2-Trichloroethane	<1.0 ug/l		
1,3-Dichloropropane	<1.0 ug/l		
Tetrachloroethene	<1.0 ug/l		
Dibromochloromethane	<1.0 ug/l		
1,2-Dibromoethane	<1.0 ug/l		
Chlorobenzene	<1.0 ug/l		
Ethylbenzene	<1.0 ug/l		
1,1,1,2-Tetrachloroethane	<1.0 ug/l		
m- & p-Xylene	<2.0 ug/l		
o-Xylene	<1.0 ug/l		
Styrene	<1.0 ug/l		
Isopropylbenzene	<1.0 ug/l		
Bromoform	<1.0 ug/l		

Remarks

DRO: date analyzed 06/13/96.

Lead: date analyzed 06/24/96. Method blank contained 7.56ug/l Pb. Spike recovery = 120.7%.

LABORATORY ANALYSIS REPORT

Client
 Twin Ports Testing
 Environmental Dept.
 728 Garfield Avenue
 Duluth, MN 55802

Project: Hughitt Slip Property
Project ID: 599-95E.RA

Collected By: R.J. Hinkel
Delivered By: R.J. Hinkel

Chem. Lab ID	2161-96LS
Sample Type	Water
Collected	05/30/96
Received	05/31/96
Reported	06/24/96
Sample Description	WS-2

Analysis	Date Analyzed	RL	
Acenaphthene	06/06/96	0.20 ug/l	ND
Acenaphthylene	06/06/96	0.040 ug/l	ND
Anthracene	06/06/96	0.32 ug/l	ND
Benzo(a)anthracene	06/06/96	0.14 ug/l	ND
Benzo(a)pyrene	06/06/96	0.14 ug/l	ND
Benzo(b)fluoranthene	06/06/96	0.080 ug/l	ND
Benzo(k)fluoranthene	06/06/96	0.060 ug/l	ND
Benzo(g,h,i)perylene	06/06/96	0.16 ug/l	ND
Chrysene	06/06/96	0.060 ug/l	ND
Dibenzo(a,h)anthracene	06/06/96	0.22 ug/l	ND
Fluoranthene	06/06/96	0.22 ug/l	ND
Fluorene	06/06/96	0.12 ug/l	ND
Indeno(1,2,3,c,d)pyrene	06/06/96	0.24 ug/l	ND
1-Methyl Naphthalene	06/06/96	0.040 ug/l	ND
2-Methyl Naphthalene	06/06/96	0.12 ug/l	ND
Naphthalene	06/06/96	0.060 ug/l	ND
Phenanthrene	06/06/96	0.24 ug/l	ND
Pyrene	06/06/96	0.18 ug/l	ND

Remarks

RL ⇒ Reporting Limit
 ND ⇒ Not Detected at or above RL

LABORATORY ANALYSIS REPORT

Client
Twin Ports Testing
Environmental Dept.
728 Garfield Avenue
Duluth, MN 55802

Chem. Lab ID: 2162-96LS
Project: Hughtitt Slip Property
Project ID: 599-95E.RA

Sample Description
Field Blank

Collected By: R.J. Hinkel
Delivered By: R.J. Hinkel
Sample Type: Water
Collected: 05/30/96
Received: 05/31/96
Analyzed: 06/06/96
Reported: 06/24/96

Analysis EPA 8021

Dichlorodifluoromethane	<1.0 ug/l	1.1.2.2-Tetrachloroethane	<1.0 ug/l
Chloromethane	<1.0 ug/l	1.2.3-Trichloropropane	<1.0 ug/l
Vinyl Chloride	<1.0 ug/l	n-Propylbenzene	<1.0 ug/l
Bromomethane	<1.0 ug/l	Bromobenzene	<1.0 ug/l
Chloroethane	<1.0 ug/l	1.3.5-Trimethylbenzene	<1.0 ug/l
Trichlorofluoromethane	<1.0 ug/l	2-Chlorotoluene	<1.0 ug/l
1,1-Dichloroethene	<1.0 ug/l	4-Chlorotoluene	<1.0 ug/l
Methylene Chloride	<1.0 ug/l	tert-Butylbenzene	<1.0 ug/l
trans-1.2-Dichloroethene	<1.0 ug/l	1.2.4-Trimethylbenzene	<1.0 ug/l
1.1-Dichloroethane	<1.0 ug/l	sec-Butylbenzene	<1.0 ug/l
2.2-Dichloropropane	<1.0 ug/l	p-Isopropyltoluene	<1.0 ug/l
cis-1.2-Dichloroethene	<1.0 ug/l	1.3-Dichlorobenzene	<1.0 ug/l
Chloroform	<1.0 ug/l	1.4-Dichlorobenzene	<1.0 ug/l
Bromochloromethane	<1.0 ug/l	n-Butylbenzene	<1.0 ug/l
1.1.1-Trichloroethane	<1.0 ug/l	1.2-Dichlorobenzene	<1.0 ug/l
1.1-Dichloropropene	<1.0 ug/l	1.2-Dibromo-3-chloropropane	<1.0 ug/l
Carbon Tetrachloride	<1.0 ug/l	1.2.4-Trichlorobenzene	<1.0 ug/l
Benzene	<1.0 ug/l	Hexachlorobutadiene	<1.0 ug/l
1.2-Dichloroethane	<1.0 ug/l	Naphthalene	<1.0 ug/l
Trichloroethene	<1.0 ug/l	1.2.3-Trichlorobenzene	<1.0 ug/l
1.2-Dichloropropane	<1.0 ug/l	Diesel Range Organics	-
Bromodichloromethane	<1.0 ug/l	Lead	-
Dibromomethane	<1.0 ug/l		
Toluene	2.1 ug/l		
1.1,2-Trichloroethane	<1.0 ug/l		
1.3-Dichloropropane	<1.0 ug/l		
Tetrachloroethene	<1.0 ug/l		
Dibromochloromethane	<1.0 ug/l		
1.2-Dibromoethane	<1.0 ug/l		
Chlorobenzene	<1.0 ug/l		
Ethylbenzene	<1.0 ug/l		
1.1.1.2-Tetrachloroethane	<1.0 ug/l		
m- & p-Xylene	<2.0 ug/l		
o-Xylene	<1.0 ug/l		
Styrene	<1.0 ug/l		
Isopropylbenzene	<1.0 ug/l		
Bromoform	<1.0 ug/l		

Remarks

DRO: date analyzed 06/13/96.

Lead: date analyzed 06/24/96. Method blank contained 7.56ug/l Pb. Spike recovery = 120.7%.

- Not Tested For

LABORATORY ANALYSIS REPORT

Client
 Twin Ports Testing
 Environmental Dept.
 728 Garfield Avenue
 Duluth, MN 55802

Chem. Lab ID: 2163-96LS
Project: Hughitt Slip Property
Project ID: 599-95E.RA

Collected By: R.J. Hinkel
Delivered By: R.J. Hinkel
Sample Type: Water
Collected: 05/30/96
Received: 05/31/96
Analyzed: 06/06/96
Reported: 06/24/96

Sample Description
 Trip Blank

Analysis EPA 8021

Dichlorodifluoromethane	<1.0 ug/l	1,1,2,2-Tetrachloroethane	<1.0 ug/l
Chloromethane	<1.0 ug/l	1,2,3-Trichloropropane	<1.0 ug/l
Vinyl Chloride	<1.0 ug/l	n-Propylbenzene	<1.0 ug/l
Bromomethane	<1.0 ug/l	Bromobenzene	<1.0 ug/l
Chloroethane	<1.0 ug/l	1,3,5-Trimethylbenzene	<1.0 ug/l
Trichlorofluoromethane	<1.0 ug/l	2-Chlorotoluene	<1.0 ug/l
1,1-Dichloroethene	<1.0 ug/l	4-Chlorotoluene	<1.0 ug/l
Methylene Chloride	<1.0 ug/l	tert-Butylbenzene	<1.0 ug/l
trans-1,2-Dichloroethene	<1.0 ug/l	1,2,4-Trimethylbenzene	<1.0 ug/l
1,1-Dichloroethane	<1.0 ug/l	sec-Butylbenzene	<1.0 ug/l
2,2-Dichloropropane	<1.0 ug/l	p-Isopropyltoluene	<1.0 ug/l
cis-1,2-Dichloroethene	<1.0 ug/l	1,3-Dichlorobenzene	<1.0 ug/l
Chloroform	<1.0 ug/l	1,4-Dichlorobenzene	<1.0 ug/l
Bromochloromethane	<1.0 ug/l	n-Butylbenzene	<1.0 ug/l
1,1,1-Trichloroethane	<1.0 ug/l	1,2-Dichlorobenzene	<1.0 ug/l
1,1-Dichloropropene	<1.0 ug/l	1,2-Dibromo-3-chloropropane	<1.0 ug/l
Carbon Tetrachloride	<1.0 ug/l	1,2,4-Trichlorobenzene	<1.0 ug/l
Benzene	<1.0 ug/l	Hexachlorobutadiene	<1.0 ug/l
1,2-Dichloroethane	<1.0 ug/l	Naphthalene	<1.0 ug/l
Trichloroethene	<1.0 ug/l	1,2,3-Trichlorobenzene	<1.0 ug/l
1,2-Dichloropropane	<1.0 ug/l	Diesel Range Organics	-
Bromodichloromethane	<1.0 ug/l	Lead	-
Dibromomethane	<1.0 ug/l		
Toluene	<1.0 ug/l		
1,1,2-Trichloroethane	<1.0 ug/l		
1,3-Dichloropropane	<1.0 ug/l		
Tetrachloroethene	<1.0 ug/l		
Dibromochloromethane	<1.0 ug/l		
1,2-Dibromoethane	<1.0 ug/l		
Chlorobenzene	<1.0 ug/l		
Ethylbenzene	<1.0 ug/l		
1,1,1,2-Tetrachloroethane	<1.0 ug/l		
m- & p-Xylene	<2.0 ug/l		
o-Xylene	<1.0 ug/l		
Styrene	<1.0 ug/l		
Isopropylbenzene	<1.0 ug/l		
Bromoform	<1.0 ug/l		

Remarks

DRO: date analyzed 06/13/96.

Lead: date analyzed 06/24/96. Method blank contained 7.56ug/l Pb. Spike recovery = 120.7%.

- Not Tested For

LAKE SUPERIOR LABORATORIES

SAMPLE CONDITION UPON RECEIPT CHECKLIST

Project: Hughitt Slip Property
 Client: TPT-E
 Date Received: 5/31/96
 COC #: 14018
 Samples Received By: H
L. Hanson
 (Signature)

- | | Yes | No |
|--|-----------|-------------|
| 1. Is there a chain of custody (COC) or letter stating information contained on a COC? | <u>X</u> | <u> </u> |
| 2. Is the date and time relinquished in agreement with that written on the letter or COC? | <u>X</u> | <u> </u> |
| 3. Do the samples received agree with the COC or accompanying paperwork (i.e. number of samples, matrices, sample tags, sample containers, analyses, etc.)? | <u>X</u> | <u> </u> |
| 4. Are all the samples within the holding times for requested analyses? Communicate any lapse of greater than 4 days beyond date of collection for VOA analysis. | <u>X</u> | <u> </u> |
| 5. Are all the sample containers intact (i.e., not broken, leaking, etc.)? | <u>X</u> | <u> </u> |
| 6. Did the samples arrive on ice? | <u>X</u> | <u> </u> |
| a) What temperature did the samples arrive at? | <u>20</u> | <u> </u> |
| b) Are the samples at the proper temperature? | <u>20</u> | <u> </u> |
| 7. Is there enough sample to do all the analyses? | <u>X</u> | <u> </u> |
| 8. Are the samples preserved correctly? | <u>X</u> | <u> </u> |
| 9. Are the VOA vials head-space free? | <u>X</u> | <u> </u> |

'NO' Items Explained:



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Tommy G. Thompson, Governor
George E. Meyer, Secretary
William H. Smith, District Director

Brule Area Headquarters
6250 South Ranger Road
P.O. Box 125
Brule, WI 54820-0125
TELEPHONE 715-372-4866
TELEFAX 715-372-4836

February 23, 1996

MR & MRS NORMAN CAMENKER
70 HIGHGATE COURT
SUPERIOR WI 54880

FILE COPY

Re: Petroleum Contamination at the Hughitt Slip Property (NWD ERP Case #16-00170)

Dear Mr. and Mrs. Camenker:

The Department has received the proposal for further soil and groundwater sampling at the above named site, prepared by Twin Ports Testing, Inc. (TPT), and dated February 20, 1996. After reviewing the proposal, the Department feels that the soil sampling protocol should be modified to include full Volatile Organic Compound (VOC), Polynuclear Aromatic Hydrocarbon (PAH) and lead (Pb) analyses at each of the three locations intended to define the degree and extent of contamination. The full VOC sampling is necessary due to the unknown nature of the contaminants. The Department is suggesting the collection of the PAH samples because, if TPT fails to demonstrate that previous PAH detections are reflective of background conditions, the Department will likely require you to return to these areas to collect PAH samples to define the degree and extent of contamination. The proposed analyses for background PAH and groundwater samples are acceptable.

Your site is currently ranked as a "High priority" site based on risk to the public and the environment. However, current workload and staffing levels do not allow us to provide you with direct oversight at this time. This letter serves as your "Notice to Proceed" with investigation and remediation of the site. All actions must comply with all applicable Federal and State laws, Wisconsin Administrative Code chs. NR 140, NR 141, NR 700 through NR 728, and program guidance. This letter is not an approval of future work plans and/or reports. They will be filed as public records until the Department is able to review them, or until site remediation is completed.

In order to ensure compliance with applicable requirements and to make sure your project proceeds to closure in a timely fashion, your consultant should follow the Department's Guidance for Conducting Environmental Response Actions. All groundwater and soil samples must be collected and analyzed in accordance with the Department's Leaking Underground Storage Tank (LUST) and Petroleum Analytical and Quality Assurance Guidance. It is very important that your consultant understands and meets the standards established by the Department; however, per s. 144.76, Wisconsin Statutes, as the responsible party, you are ultimately responsible for the investigation and remediation that is required at your site. Failure to follow guidance may result in delays when the site is reviewed for closure.

If you are interested in obtaining the protection of limited liability under s. 144.765, Wis. Stats., please contact the Contaminated Land Recycling Program at (800) 367-6076 (instate long distance) or (608) 264-6020 (local or out of state), in the Department of Natural Resources' Madison office for more information. The liability exemption under s. 144.765, Wis. Stats., is available to persons who meet the definition of "purchaser" in s. 144.765 (1)(c) and receive Department approval for the response actions taken at the property undergoing cleanup. The Department will determine eligibility for this program on a case-by-case basis, prior to the "purchaser" developing a scope of work for conducting a ch. NR 716, Wis. Adm. Code, site investigation at the property.



Effective the date of this letter, **every 90 days**, you or your consultant should provide the Department with a brief status report of one or two pages, providing an update on site activities and your proposed schedule. The Department must be notified **immediately** of any emergency conditions (e.g. explosive vapors in a basement, contaminated drinking water well, detection of free product), and you must implement any actions necessary to correct the emergency situation as soon as possible.

The Department will continue to review soil disposal notifications as they are submitted. Any well construction variances or WPDES permits should be obtained prior to construction, disposal or discharge. The Department will review your case for closure when the full extent of contamination has been determined and the appropriate cleanup has been completed.

As workload and staff levels are adjusted, the status of this case may be changed and we may be able to review your consultant's work for completeness and acceptability. You will be informed, in writing, if the site status is changed.

If you should have any questions, please feel free to contact our office at 715/372-4866.

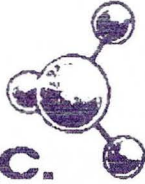
Sincerely,



Christopher A. Saari
Hydrogeologist

cc: Jon Hinkel - Twin Ports Testing, Inc., 728 Garfield Ave., Duluth, MN 55802

SINCE 1972



1301 NORTH THIRD STREET • SUPERIOR, WISCONSIN 54880
(715) 392-7114 • FAX (715) 392-7163

728 GARFIELD AVENUE • DULUTH, MINNESOTA 55802
(218) 722-1911 • FAX (218) 722-3295

8 INDUSTRIAL PARK ROAD • NEGAUNEE, MICHIGAN 49866
(906) 226-6653 • FAX (906) 226-3699

TWIN PORTS TESTING INC.

Telecopier Transmittal Cover Sheet

Number of pages to be transmitted: **(9)**

Date: February 20th 1996

Please Deliver the Following Pages To:

Name:

Chris Saari

Company:

Wisconsin DNR

Telecopier Number:

715-372-4836

TPT project number:

TPT facsimile number: **(218) 722-3295**

TPT phone number: **(218) 722 1911**

This Telecopy is being sent by:

Remarks:

Dear Chris,

Thank you for your input during our meeting yesterday afternoon concerning the Hughitt Slip site in Superior, Wisconsin. In response to your comments, we are proposing the following program of soil sample collection and analyses be performed. All soil samples would be collected from the water table using a hand auger:

- One sample collected northwest of the present excavations to be analyzed for lead;*
- One sample collected east of the excavations to be analyzed for PVOCS and lead;*
- One sample collected southwest of the excavations to be analyzed for PVOCS;*

- One sample collected at least 30 feet south of the excavations, to be analyzed for PAHs.

The soil sample collection site locations have been chosen in an effort to reasonably define the extent of PVOC compounds and lead present in the site's soils, and to strengthen evidence of PAH background contamination. In consideration of the closeness of the site to the edge of the Hughitt Slip (14 feet), we believe that the edge of slip serves adequately to define the western limits of any PVOC or lead soil concentrations extending west of the excavation.

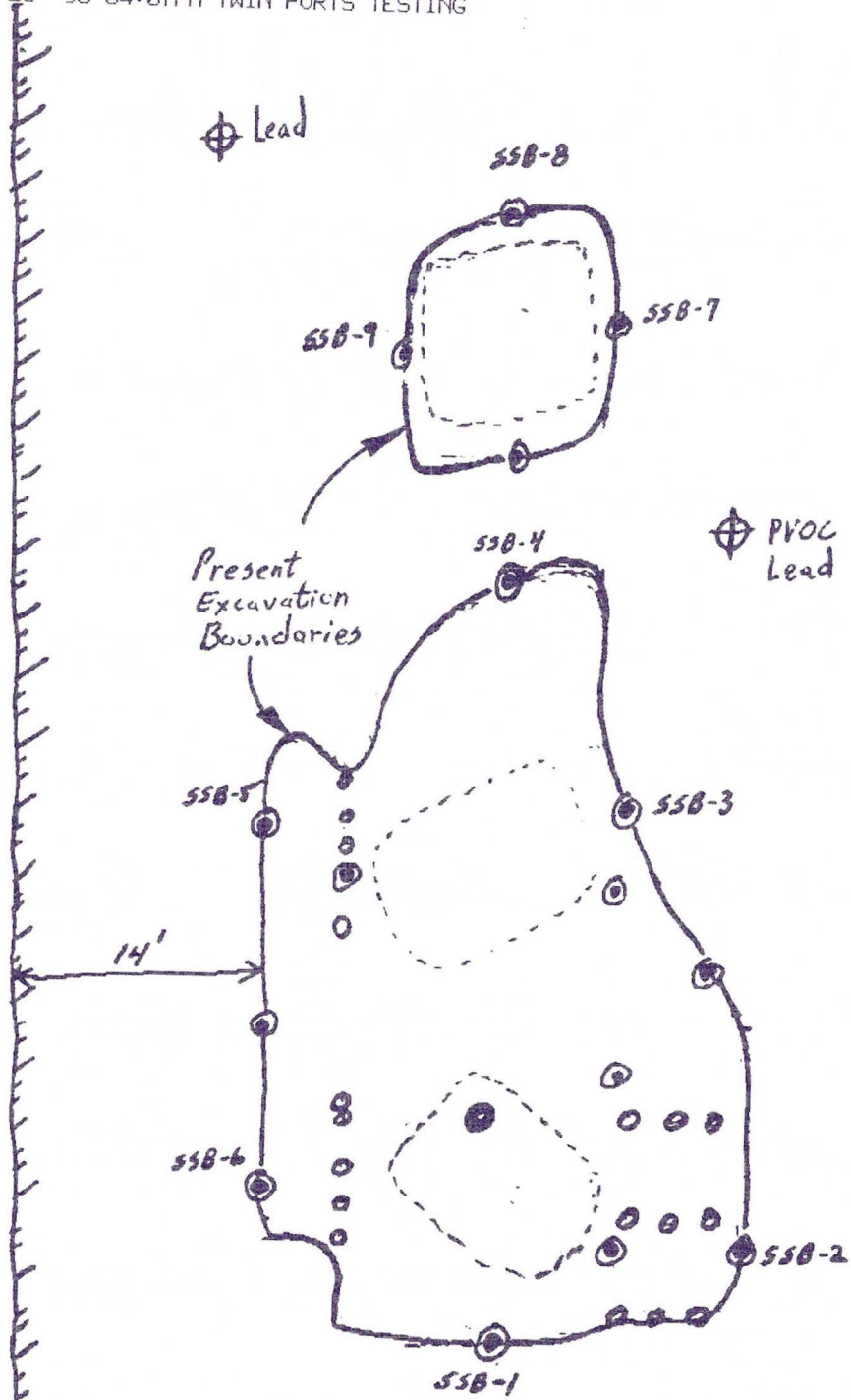
In addition to soil sample collection and analysis, we plan to install one temporary groundwater monitoring well upon backfilling of the excavations. The temporary well would be developed as fully as possible and sampled for VOCs, PAHs and lead.

I will be contacting you by phone within a day or so. I look forward to hearing your comments.

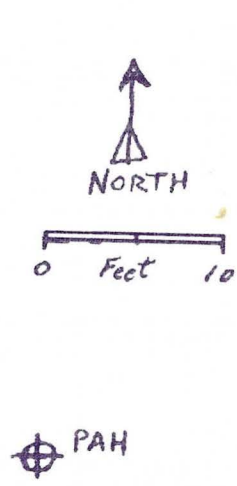
Thank you,

Jon Hinkel

- HUGHITT SLIP -



- ◆ = proposed soil sampling location
- = proposed temp. monitoria well location
- = wood piling
- ⊙ = soil sampling location for field screening; numbered locations indicate lab analyses samples collected
- ⊖ = original area of surface scraping



⊖ PVOc

⊖ PAH

Client
 Twin Ports Testing
 Environmental Dept.
 728 Garfield Avenue
 Duluth, MN 55802

Project: Hughitt Slip Property
Project ID: 599-95E.RA

Collected By: R.J. Hinkel
Delivered By: R.J. Hinkel

Chem. Lab ID	1160-96LS	1161-96LS	1162-96LS
Sample Type	Soil	Soil	Soil
Collected	01/19/96	01/19/96	01/19/96
Received	01/19/96	01/19/96	01/19/96
Reported	02/15/96	02/15/96	02/15/96
Sample Description	SSB-1	SSB-2	SSB-3

Analysis	Date Analyzed	MDL	1160-96LS	1161-96LS	1162-96LS
Lead	01/26/96	5.00 mg/kg	14.6 mg/kg	ND	ND
MTBE	01/30/96	25 ug/kg	98 ug/kg	ND	ND
Benzene	01/30/96	5.0 ug/kg	27 ug/kg	ND	ND
Toluene	01/30/96	25 ug/kg	77 ug/kg	ND	ND
Ethylbenzene	01/30/96	25 ug/kg	ND	ND	ND
Xylenes, Total	01/30/96	75 ug/kg	ND	ND	ND
1,3,5-Trimethylbenzene	01/30/96	25 ug/kg	ND	ND	ND
1,2,4-Trimethylbenzene	01/30/96	25 ug/kg	ND	ND	ND
Moisture	01/30/96	1.00 %	23.2 %	17.6 %	19.1 %
Diesel Range Organics	02/01/96	0.100 mg/l	ND	ND	ND

Remarks

MDL ⇒ Method Detection Limit
 ND ⇒ Not Detected at or above MDL

Client
 Twin Ports Testing
 Environmental Dept.
 728 Garfield Avenue
 Duluth, MN 55802

Project: Hughitt Slip Property
Project ID: 599-95E.RA

Collected By: R.J. Hinkel
Delivered By: R.J. Hinkel

Chem. Lab ID	1166-96LS		
Sample Type	Soil		
Collected	01/19/96		
Received	01/19/96		
Reported	02/15/96		
Sample Description	SSB-7		

Analysis	Date Analyzed	MDL		
Lead	01/26/96	5.00 mg/kg	98.3 mg/kg	
MTBE	01/30/96	25 ug/kg	ND	
Benzene	01/30/96	5.0 ug/kg	ND	
Toluene	01/30/96	25 ug/kg	ND	
Ethylbenzene	01/30/96	25 ug/kg	ND	
Xylenes, Total	01/30/96	75 ug/kg	ND	
1,3,5-Trimethylbenzene	01/30/96	25 ug/kg	ND	
1,2,4-Trimethylbenzene	01/30/96	25 ug/kg	ND	
Moisture	01/30/96	1.00 %	28.9 %	
Diesel Range Organics	02/01/96	0.100 mg/l	ND	

Remarks

MDL ⇒ Method Detection Limit
 ND ⇒ Not Detected at or above MDL

Client
 Twin Ports Testing
 Environmental Dept.
 728 Garfield Avenue
 Duluth, MN 55802

Project: Hughitt Slip Property
Project ID: 599-95E.RA

Collected By: R.J. Hinkel
Delivered By: R.J. Hinkel

Chem. Lab ID

Sample Type

**Collected
 Received
 Reported**

**Sample
 Description**

1162-96LS		
Soil		
01/19/96 01/19/96 02/15/96		
SSB-3		

Analysis	Date Analyzed	MDL		
Naphthalene	02/13/96	160 ug/kg	ND	
Acenaphthylene	02/13/96	240 ug/kg	ND	
Acenaphthene	02/13/96	80.0 ug/kg	ND	
Fluorene	02/13/96	80.0 ug/kg	ND	
Phenanthrene	02/13/96	12.0 ug/kg	18.6 ug/kg	
Anthracene	02/13/96	3.60 ug/kg	ND	
Fluoranthene	02/13/96	12.0 ug/kg	51.2 ug/kg	
Pyrene	02/13/96	20.0 ug/kg	60.5 ug/kg	
Benzo[a]anthracene	02/13/96	2.80 ug/kg	26.0 ug/kg	
Chrysene	02/13/96	2.80 ug/kg	36.3 ug/kg	
Benzo[b]fluoranthene	02/13/96	2.40 ug/kg	19.5 ug/kg	
Benzo[k]fluoranthene	02/13/96	2.40 ug/kg	11.6 ug/kg	
Benzo[a]pyrene	02/13/96	3.20 ug/kg	23.7 ug/kg	
Dibenzo[a,h]anthracene	02/13/96	20.0 ug/kg	<40.0 ug/kg	
Benzo[g,h,i]perylene	02/13/96	32.0 ug/kg	<64.0 ug/kg	
Indeno[1,2,3-cd]pyrene	02/13/96	8.00 ug/kg	<16.0 ug/kg	

Remarks

1162-96LS Elevated detection limit due to sample concentration.

MDL ⇒ Method Detection Limit
 ND ⇒ Not Detected at or above MDL

Client
 Twin Ports Testing
 Environmental Dept.
 728 Garfield Avenue
 Duluth, MN 55802

Project: Hughitt Slip Property
Project ID: 599-95E.RA

Collected By: R.J. Hinkel
Delivered By: R.J. Hinkel

Chem. Lab ID	1176-96LS	1177-96LS	1178-96LS
Sample Type	Soil	Soil	Soil
Collected	01/22/96	01/22/96	01/22/96
Received	01/23/96	01/23/96	01/23/96
Reported	02/15/96	02/15/96	02/15/96
Sample Description	SSB-4	SSB-5	SSB-6

Analysis	Date Analyzed	MDL	1176-96LS	1177-96LS	1178-96LS
MTBE	01/30/96	25 ug/kg	ND	ND	ND
Benzene	01/30/96	5.0 ug/kg	57 ug/kg	50 ug/kg	50 ug/kg
Toluene	01/30/96	25 ug/kg	94 ug/kg	81 ug/kg	84 ug/kg
Ethylbenzene	01/30/96	25 ug/kg	50 ug/kg	52 ug/kg	53 ug/kg
Xylenes, Total	01/30/96	75 ug/kg	160 ug/kg	190 ug/kg	180 ug/kg
1,3,5-Trimethylbenzene	01/30/96	25 ug/kg	36 ug/kg	47 ug/kg	43 ug/kg
1,2,4-Trimethylbenzene	01/30/96	25 ug/kg	52 ug/kg	64 ug/kg	59 ug/kg
Lead	01/26/96	5.00 mg/kg	256 mg/kg	315 mg/kg	117 mg/kg
Moisture	01/30/96	1.00 %	20.9 %	35.0 %	29.9 %
Diesel Range Organics	02/02/96	5.00 mg/kg	61.5 mg/kg	29.2 mg/kg	22.3 mg/kg

Remarks

MDL ⇒ Method Detection Limit
 ND ⇒ Not Detected at or above MDL

Client
 Twin Ports Testing
 Environmental Dept.
 728 Garfield Avenue
 Duluth, MN 55802

Project: Hughitt Slip Property
Project ID: 599-95E.RA

Collected By: R.J. Hinkel
Delivered By: R.J. Hinkel

	Chem. Lab ID	1179-96LS	1180-96LS	
	Sample Type	Soil	Soil	
Collected	01/22/96	01/22/96		
Received	01/23/96	01/23/96		
Reported	02/15/96	02/15/96		
Sample Description	SSB-8	SSB-9		
Analysis	Date Analyzed	MDL		
MTBE	01/30/96	25 ug/kg	ND	ND
Benzene	01/30/96	5.0 ug/kg	ND	ND
Toluene	01/30/96	25 ug/kg	49 ug/kg	60 ug/kg
Ethylbenzene	01/30/96	25 ug/kg	44 ug/kg	58 ug/kg
Xylenes, Total	01/30/96	75 ug/kg	140 ug/kg	180 ug/kg
1,3,5-Trimethylbenzene	01/30/96	25 ug/kg	39 ug/kg	53 ug/kg
1,2,4-Trimethylbenzene	01/30/96	25 ug/kg	51 ug/kg	61 ug/kg
Lead	01/26/96	5.00 mg/kg	115 mg/kg	321 mg/kg
Moisture	01/30/96	1.00 %	27.2 %	53.9 %
Diesel Range Organics	02/02/96	5.00 mg/kg	ND α	71.1 mg/kg

Remarks

MDL \Rightarrow Method Detection Limit
 ND \Rightarrow Not Detected at or above MDL

α \Rightarrow Analyzed On 02/01/96

Client
 Twin Ports Testing
 Environmental Dept.
 728 Garfield Avenue
 Duluth, MN 55802

Project: Hughitt Slip Property
Project ID: 599-95E.RA

Collected By: R.J. Hinkel
Delivered By: R.J. Hinkel

Chem. Lab ID	1178-96LS	1180-96LS	
Sample Type	Soil	Soil	
Collected	01/22/96	01/22/96	
Received	01/23/96	01/23/96	
Reported	02/15/96	02/15/96	
Sample Description	SSB-6	SSB-9	

Analysis	Date Analyzed	MDL		
Naphthalene	02/14/96	160 ug/kg	ND	ND
Acenaphthylene	02/14/96	240 ug/kg	ND	ND
Acenaphthene	02/14/96	80.0 ug/kg	419 ug/kg	859 ug/kg
Fluorene	02/14/96	80.0 ug/kg	ND	ND
Phenanthrene	02/14/96	12.0 ug/kg	223 ug/kg	713 ug/kg
Anthracene	02/14/96	3.60 ug/kg	32.4 ug/kg	80.7 ug/kg
Fluoranthene	02/14/96	12.0 ug/kg	447 ug/kg	1120 ug/kg
Pyrene	02/14/96	20.0 ug/kg	503 ug/kg	1290 ug/kg
Benzo[a]anthracene	02/14/96	2.80 ug/kg	156 ug/kg	421 ug/kg
Chrysene	02/14/96	2.80 ug/kg	235 ug/kg	618 ug/kg
Benzo[b]fluoranthene	02/14/96	2.40 ug/kg	117 ug/kg	249 ug/kg
Benzo[k]fluoranthene	02/14/96	2.40 ug/kg	61.4 ug/kg	146 ug/kg
Benzo[a]pyrene	02/14/96	3.20 ug/kg	134 ug/kg	387 ug/kg
Dibenzo[a,h]anthracene	02/14/96	20.0 ug/kg	<200 ug/kg	<400 ug/kg
Benzo[g,h,i]perylene	02/14/96	32.0 ug/kg	<320 ug/kg	<640 ug/kg
Indeno[1,2,3-cd]pyrene	02/14/96	8.00 ug/kg	<80.0 ug/kg	<160 ug/kg

Remarks

WI DNR Laboratory Certification #999446800

1178-96LS Elevated detection limit due to sample concentration.

1180-96LS Elevated detection limit due to sample concentration.

MDL ⇒ Method Detection Limit

ND ⇒ Not Detected at or above MDL

Miss Saan / Bull

1-2-1955
No. 72755
Miss Saan / Bull

**NORTHWEST DISTRICT HEADQUARTERS
Routing Slip**

By Phyllis Holmbeck Date 1/5/95

- | | | |
|--------------------------------------|--------------------------------------|-------------------------------------|
| <input type="checkbox"/> Bishop | <input type="checkbox"/> Kruger | <input type="checkbox"/> Brule |
| <input type="checkbox"/> Clark | <input type="checkbox"/> Kallenbach | <input type="checkbox"/> |
| <input type="checkbox"/> Gantz | <input type="checkbox"/> Miller | <input type="checkbox"/> Cumberland |
| <input type="checkbox"/> Michels | <input type="checkbox"/> LeRoy | <input type="checkbox"/> |
| <input type="checkbox"/> DeWitt | <input type="checkbox"/> Dunn | <input type="checkbox"/> Park Falls |
| <input type="checkbox"/> Fabert | <input type="checkbox"/> Kafura | <input type="checkbox"/> |
| <input type="checkbox"/> Bierd | <input type="checkbox"/> Kendzierski | <input type="checkbox"/> Madison |
| <input type="checkbox"/> Conklin, K. | <input type="checkbox"/> Prohaska | <input type="checkbox"/> |
| <input type="checkbox"/> Finance | <input type="checkbox"/> Spangberg | <input type="checkbox"/> LMD |
| <input type="checkbox"/> LaBumbard | <input type="checkbox"/> Sutton | <input type="checkbox"/> |
| <input type="checkbox"/> Peterson | <input type="checkbox"/> Michaelsen | <input type="checkbox"/> NCD |
| <input type="checkbox"/> Stair | <input type="checkbox"/> Pratt | <input type="checkbox"/> |
| <input type="checkbox"/> Tesky | <input type="checkbox"/> Moss | <input type="checkbox"/> SED |
| <input type="checkbox"/> Wallace, S. | <input type="checkbox"/> Ross | <input type="checkbox"/> |
| <input type="checkbox"/> Gothblad | <input type="checkbox"/> Hayducsko | <input type="checkbox"/> SD |
| <input type="checkbox"/> Bartilson | <input type="checkbox"/> Holmbeck | <input type="checkbox"/> |
| <input type="checkbox"/> LaRose | <input type="checkbox"/> Schweiger | <input type="checkbox"/> WD |
| <input type="checkbox"/> Gozdzialski | <input type="checkbox"/> Scott | <input type="checkbox"/> |
| <input type="checkbox"/> Herrick | <input type="checkbox"/> Adams | <input type="checkbox"/> |
| <input type="checkbox"/> Cable | <input type="checkbox"/> Monson | <input type="checkbox"/> |
| <input type="checkbox"/> Hanson | <input type="checkbox"/> Weber | <input type="checkbox"/> |
| <input type="checkbox"/> Pratt | <input type="checkbox"/> Smith, B. | <input type="checkbox"/> |
| <input type="checkbox"/> Jennings | <input type="checkbox"/> Smith, T. | <input type="checkbox"/> |
| <input type="checkbox"/> Kampa | <input type="checkbox"/> Ierace | <input type="checkbox"/> |
| <input type="checkbox"/> Margenau | <input type="checkbox"/> Koshere | <input type="checkbox"/> |
| <input type="checkbox"/> Johnson, C. | <input type="checkbox"/> Larson | <input type="checkbox"/> |
| <input type="checkbox"/> Johannes | <input type="checkbox"/> Malischke | <input type="checkbox"/> |
| <input type="checkbox"/> Peterson | <input type="checkbox"/> Roesler | <input type="checkbox"/> |
| <input type="checkbox"/> Kies | <input type="checkbox"/> Ryan | <input type="checkbox"/> |
| <input type="checkbox"/> Dettle | <input type="checkbox"/> Wallace, P. | <input type="checkbox"/> |
| | <input type="checkbox"/> Conklin, D. | <input type="checkbox"/> |
| | <input type="checkbox"/> Zeug | <input type="checkbox"/> |
| | <input type="checkbox"/> Halverson | <input type="checkbox"/> |

- Answer for _____ sign
 Confer with me
 Follow through
 Note and return
 Note and toss
 For comments and/or approval
 Route and/or file
 For your information

RECEIVED
 JAN 08 1996
 DWR - SPOONER

COMMENTS: _____

Biotreat (landfill)

rec. 1/4/95
96 PJH.

State of Wisconsin
Department of Natural Resources

NOTIFICATION TO TREAT OR DISPOSE OF PETROLEUM CONTAMINATED SOIL & WATER


Form 4400-120
Rev. 9-95

This form is required by the Department of Natural Resources (DNR) to ensure that the remediation of petroleum contaminated soil and water is in compliance with NR 500-540, NR 158, NR 419 and NR 445, Wis. Adm. Code. Failure to comply with applicable statutes and administrative rules may lead to violations of subchapters III and IV of Ch. 144, Wis. Stats. and may result in forfeitures of not less than \$10 or more than \$25,000 for each violation, pursuant to ss. 144.426(1), 144.74(1), 144.99, Wis. Stats., or fines of not less than \$100 or more than \$150,000 or imprisonment for not more than 10 years, or both, pursuant to s. 144.74(2), Wis. Stats. Each day of a continuing violation constitutes a separate violation. Except for the remediation of virgin petroleum spills, this form needs to be submitted to the DNR 10 business days prior to the commencement of the remediation.

DIRECTIONS: 1) Complete both sides of the form. 2) Have the responsible party sign the form. This signature certifies that the information on this form and in all supporting documents is accurate. 3) Submit the form with supporting documentation, lab reports and any maps to the appropriate District Air Management Program at least 10 business days prior to the commencement of remediation. 4) Submit a copy of this form to the DNR project manager and retain a copy for your records.

ERP #170

PART I - GENERAL INFORMATION

Site Name & Address: <i>Hughitt Slip Property Superior, Wisconsin (no street address - see attached maps)</i>	Date of Form Completion: <i>January 4, 1996</i>
Site #: <i>Excavation # 3 area (see Figure 3, attached)</i>	Do Other Remediation Systems Exist at This Site? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
County: <i>Douglas</i>	Site Type: <input type="checkbox"/> LUST <input type="checkbox"/> ERP <input type="checkbox"/> CERCLA <input type="checkbox"/> Other, Explain: <i>spill site - apparently waste oil</i>
Responsible Party Name & Address: <i>Norman & Donna Camenker 70 Highgate Court Superior, Wisconsin 54880</i>	Responsible Party Signature:  Telephone #: <i>(715) 392-5457 (WI) (602) 855-4825 (Ariz.)</i>
Consulting Firm Name & Address: <i>Twin Ports Testing, Inc. 728 Garfield Avenue Duluth, Minnesota 55802</i>	Consulting Firm Contact: <i>Jon Hinkel, geologist</i> Telephone #: <i>(218) 722-1911</i>

PART II - SOIL AND WATER DATA (Attach Lab Reports and Calculations) *

Type of Contamination: <input type="checkbox"/> Gasoline <input type="checkbox"/> Diesel <input type="checkbox"/> Fuel Oil <input checked="" type="checkbox"/> Waste Oil <input type="checkbox"/> Chlorinated Organics <input type="checkbox"/> Other: _____	
Soil Concentration:	
GRO: _____ lb	_____ mg/kg/10 ⁶ x 2,800 lb/yd ³ x _____ yd ³ =
DRO: <u>2370</u> lb	<u>4240</u> mg/kg/10 ⁶ x 2,800 lb/yd ³ x <u>200</u> yd ³ = <u>2370</u>
Benzene: _____ lb	<u><.025</u> mg/kg/10 ⁶ x 2,800 lb/yd ³ x <u>200</u> yd ³ = <u><.014</u> lb
Chlorinated Organics: _____ lb	_____ mg/kg/10 ⁶ x 2,800 lb/yd ³ x _____ yd ³ =
Other: _____ lb	_____ mg/kg/10 ⁶ x 2,800 lb/yd ³ x _____ yd ³ =
Water Concentration: GRO: _____ mg/L DRO: _____ mg/L Benzene: _____ mg/L Chlorinated Organics: _____ mg/L Other: _____ mg/L	

PART III - TREATMENT OR DISPOSAL FACILITY INFORMATION

Treatment/Disposal Facility Name & Address: <u>Jackson County Landfill, Inc.</u> <u>Route 3, Box 95B</u> <u>Black River Falls, WI 54615</u>	Facility ID: <u>02004</u>
Facility Contact: <u>Alina Limberg</u>	Air Pollution Control Permit #: <u>Not necessary</u>
Telephone #: <u>(715) 284-2262</u>	Facility Located in 10-county Area in Southeast Wisconsin: <u>No</u>
Headquarter Address: <u>Same as above.</u>	Distance to Nearest Residence or Business: <u>1/2 miles</u>
	Portable Sources Only: Has a Portable Source Relocation Notification (Form 4500-25) Been Submitted for this Location: <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <u>N/A</u>

* Please note: the concentrations provided for DRO and Benzene are maximum readings; the bulk of our sample analyses results are of much lower concentrations.

PART III - SOIL VACUUM EXTRACTION OR GROUNDWATER REMEDIATION

<p>Site Contact & Telephone #:</p> <hr/> <p>Is Site Located in the 10-county Area in</p> <hr/> <p>Distance to Nearest</p> <hr/> <p><u>Pilot Test/Soil Venting Only</u> (Attach Lab Reports and Calculations)</p> <p>Date of Test:</p> <p align="center"><i>- Not Applicable -</i></p> <p>Flow Rate (scfm):</p> <p align="center"><i>- Not Applicable -</i></p> <p>Total Withdrawal of Air (scf):</p> <p>Total VOC Emission Rate (lb/hr):</p> <p>Benzene Emission Rate (lb/hr):</p>	<p><u>Proposed Operations (Attach Calculations)</u></p> <p>Anticipated Start-Up Date:</p> <p>Estimated Project Duration:</p> <p># of Wells:</p> <p># of Emission Points:</p> <p>Stack Height: <i>- Not Applicable -</i></p> <p>Maximum Equipment Flow Rate (scfm or gpm):</p> <p>Total VOC Emission Rate (lb/hr):</p> <p>Benzene Emission Rate (lb/hr):</p> <p>Benzene Emission Rate (lb/yr):</p>
--	---

PART III - OTHER REMEDIATION METHODS

Proposing Other Remediation Method: YES Method Name: _____

Attach a project description for other remediation methods including landspreading, passive aeration and bioremediation. At a minimum, the information submitted should include the following items (with any supporting lab reports and calculations):

- ✓ Address/Location of Remediation Site - Indicate if this location is in the 10-county area in Southeast Wisconsin and the distance to the nearest residence or business. Include a map or site plan if appropriate.
- ✓ Description of Remediation Method
- ✓ Project Contact & Telephone #
- ✓ Anticipated Start-Up and Estimated Project Duration
- ✓ Highest Estimated Hourly VOC Emissions
- ✓ Highest Estimated Hourly and Annual Benzene Emissions
- ✓ Emission Testing Methodology
- ✓ Final Destination of Soil

- Not Applicable -

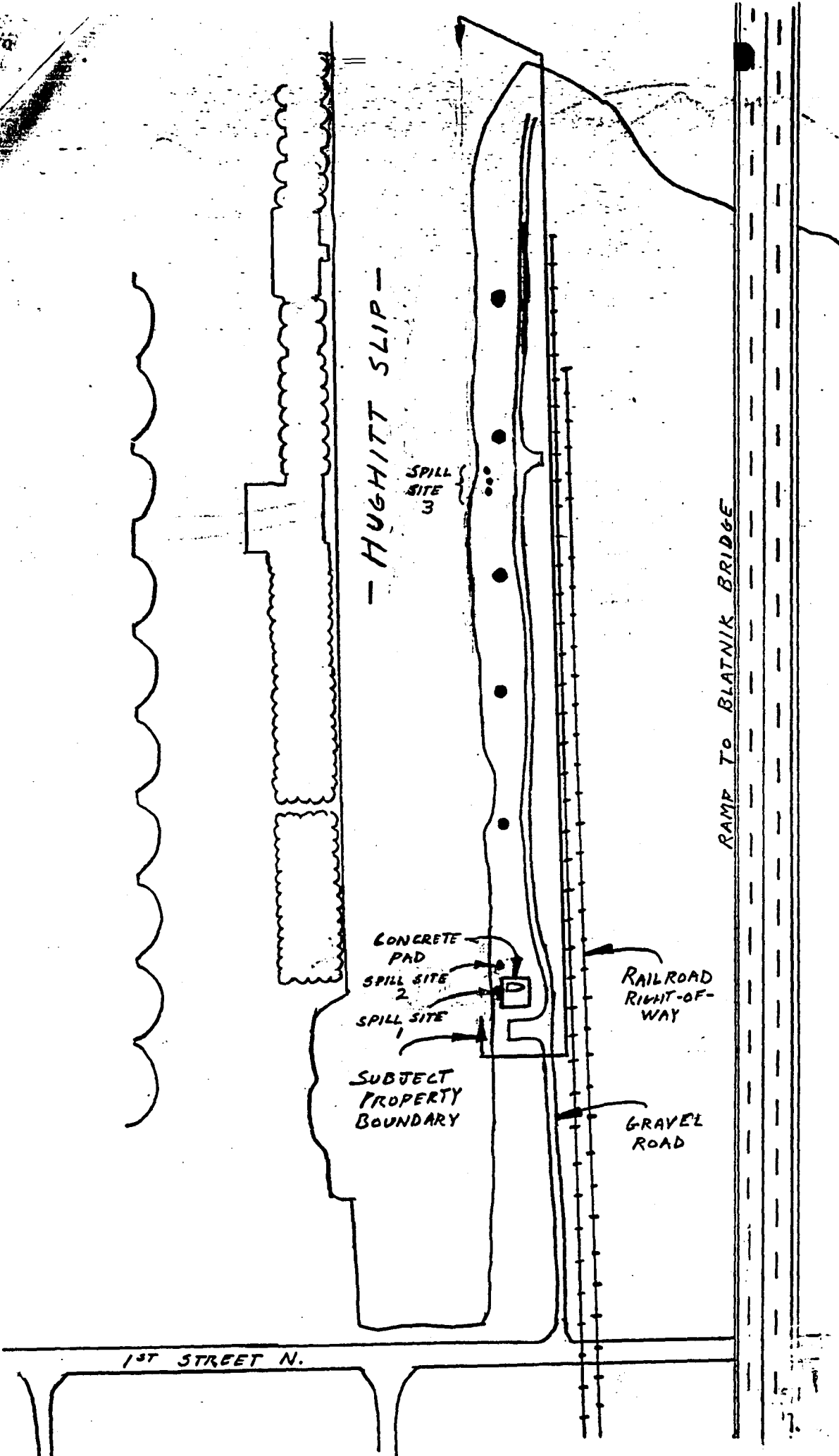


Figure 2
Site Map
Hughtitt Slip Property
Superior, Wisconsin

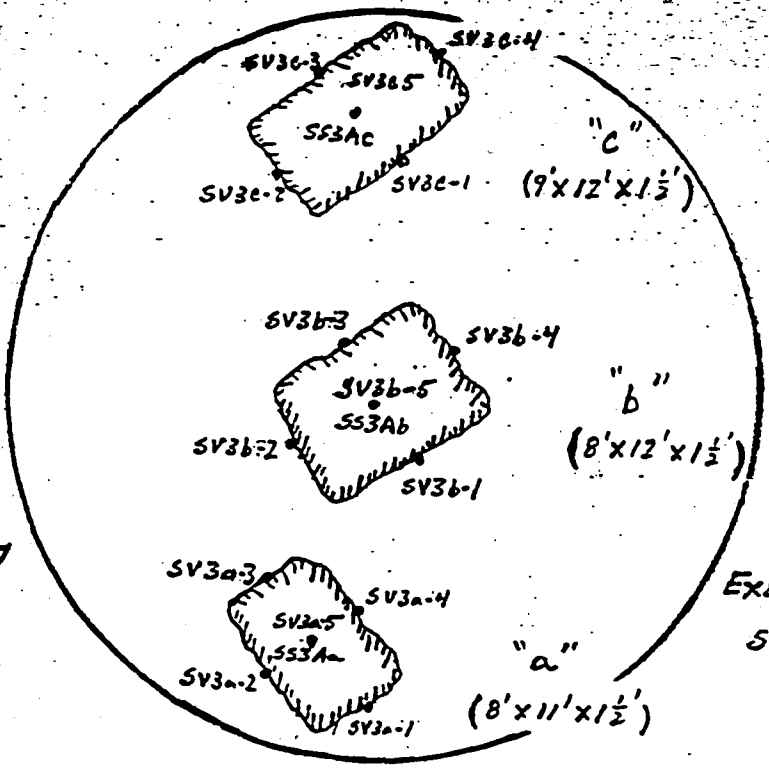
HUGHITT SLIP



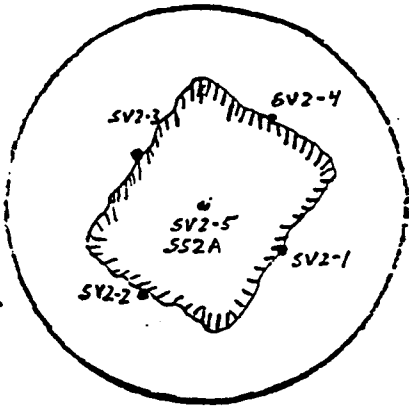
SPILL SITE 3

SPILL SITE 2

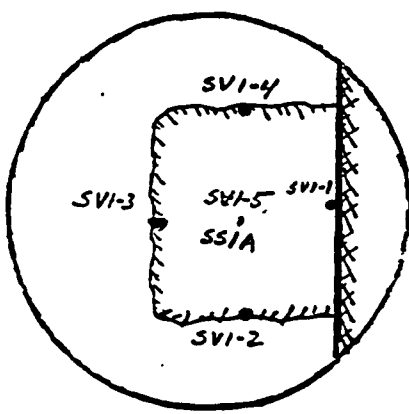
SPILL SITE 1



EXCAVATION SITE 3

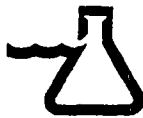


EXCAVATION SITE 2 (8' x 9' x 1 1/2')



EXCAVATION SITE 1 (7' x 12' x 2')

Figure 3 Site Map Showing Sampling Location Details Hughitt Slip Property Superior, Wisconsin



728 GARFIELD AVENUE ■ DULUTH, MINNESOTA 55802
MN (218) 722-1911 ■ FAX (218) 722-3295

A DIVISION OF TWIN PORTS TESTING, INC.

LAKE SUPERIOR LABORATORIES

Date: 12/18/95

Client: Twin Ports Testing
Environmental Dept.
728 Garfield Avenue
Duluth, MN 55802

Attn: Jon Hinkel

Phone: (218) 722-1911

Fax: (218) 722-3295

Chain of Custody #: 13367

Project: Hughitt Slip Property

Project ID: 561-95E.RA

LAB ID #	SAMPLE ID
4392-95LS	SS1A
4393-95LS	SS2A
4394-95LS	SS3Aa
4395-95LS	SS3Ab
4396-95LS	SS3Ac

Signature

Linda Thiry, Director
Tim Buck, Lab Manager

REVISED
12/18/95

Wis. Certification Number: 816057440

Minn. Certification Number: 027-137-307

This cover page is the first of _____ pages

Quality Assurance / Quality Control Report

Client: Twin Ports Testing

Chain Of Custody #: 13367

Project: Hughitt Slip Property

Project ID: 561-95E.RA

QC Parameter	Blank	Soil Blank	Duplicate	Spike	Spike Duplicate	Soil Spike	Soil Spike Duplicate
DRO	NA	Pass	NA	NA	NA	Pass	Pass
BTEX/PVOC	NA	Pass	NA	NA	NA	Pass	Pass
INORGANICS	Pass	NA	NA	Pass	NA	NA	NA

Remarks

Client
 Twin Ports Testing
 Environmental Dept.
 728 Garfield Avenue
 Duluth, MN 55802

Project: Hughitt Slip Property
Project ID: 561-95E.RA

Collected By: R.J. Hinkel
Delivered By: R.J. Hinkel

Chem. Lab ID	4392-95LS	4393-95LS	4394-95LS
Sample Type	Soil	Soil	Soil
Collected	09/26/95	09/26/95	09/26/95
Received	09/28/95	09/28/95	09/28/95
Reported	12/18/95	12/18/95	12/18/95
Sample Description	SS1A	SS2A	SS3Aa

Analysis	Date Analyzed	MDL	4392-95LS	4393-95LS	4394-95LS
MTBE	10/04/95	25.0 ug/kg	ND α	ND	<200 ug/kg
Benzene	10/04/95	5.00 ug/kg	ND α	ND	<25.0 ug/kg
Toluene	10/04/95	25.0 ug/kg	ND α	ND	765 ug/kg
Ethylbenzene	10/04/95	25.0 ug/kg	ND α	ND	238 ug/kg
Total Xylenes	10/04/95	75.0 ug/kg	ND α	ND	251 ug/kg
1,3,5 Trimethylbenzene	10/04/95	25.0 ug/kg	ND α	ND	1310 ug/kg
1,2,4 Trimethylbenzene	10/04/95	25.0 ug/kg	ND α	ND	8410 ug/kg
Lead	10/11/95	10.0 mg/kg	ND	ND	254 mg/kg
Moisture	10/04/95	1.00 %	17.8 %	19.0 %	24.4 %
Diesel Range Organics	09/29/95	5.00 mg/kg	5.10 mg/kg	ND	4240 mg/kg α

Remarks

REVISED REPORT

4394-95LS. Elevated detection limit due to dilution effect.

MDL \Rightarrow Method Detection Limit

ND \Rightarrow Not Detected at or above MDL

α \Rightarrow Analyzed On 10/03/95

Client
 Twin Ports Testing
 Environmental Dept.
 728 Garfield Avenue
 Duluth, MN 55802

Project: Hughitt Slip Property
Project ID: 561-95E.RA

Collected By: R.J. Hinkel
Delivered By: R.J. Hinkel

Chem. Lab ID
Sample Type
Collected Received Reported
Sample Description

4395-95LS	4396-95LS	
Soil	Soil	
09/26/95 09/28/95 12/18/95	09/26/95 09/28/95 12/18/95	
SS3Ab	SS3Ac	

Analysis	Date Analyzed	MDL		
MTBE	10/04/95	25.0 ug/kg	89.6 ug/kg	<200 ug/kg
Benzene	10/04/95	5.00 ug/kg	19.1 ug/kg	<10.0 ug/kg
Toluene	10/04/95	25.0 ug/kg	219 ug/kg	<200 ug/kg
Ethylbenzene	10/04/95	25.0 ug/kg	<200 ug/kg	<200 ug/kg
Total Xylenes	10/04/95	75.0 ug/kg	<200 ug/kg	<200 ug/kg
1,3,5 Trimethylbenzene	10/04/95	25.0 ug/kg	<200 ug/kg	<200 ug/kg
1,2,4 Trimethylbenzene	10/04/95	25.0 ug/kg	<200 ug/kg	<200 ug/kg
Lead	10/11/95	10.0 mg/kg	257 mg/kg	160 mg/kg
Moisture	10/04/95	1.00 %	28.2 %	27.3 %
Diesel Range Organics	09/29/95	5.00 mg/kg	11.8 mg/kg α	8.26 mg/kg

Remarks

REVISED REPORT

4395-95LS Elevated detection limit due to dilution effect.

4396-95LS Elevated detection limit due to dilution effect.

MDL \Rightarrow Method Detection Limit

ND \Rightarrow Not Detected at or above MDL

α \Rightarrow Analyzed On 10/03/95



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Brule Area Headquarters
6250 South Ranger Road
P.O. Box 125
Brule, WI 54820-0125
TELEPHONE 715-372-4866
TELEFAX 715-372-4836

George E. Meyer
Secretary

December 28, 1995

FILE COPY

MR AND MRS NORMAN CAMENKER
70 HIGHGATE COURT
SUPERIOR WI 54880

Re: Petroleum Contamination at the Hughitt Slip Property (NWD ERP Case #16-00170),
Superior, Wisconsin

Dear Mr. and Mrs. Camenker:

The Department has received the work plan for Continuation of Remedial Action at the above named site, prepared by Twin Ports Testing, Inc. (TPT) and dated December 21, 1995.

After reviewing the proposal, the Department finds it to be acceptable, and we encourage you to instruct TPT to proceed with the measures specified in the work plan. As was pointed out in the work plan, it is likely that some type of continued groundwater monitoring will be necessary before this case could be reviewed for closure.

If you have any questions concerning this letter or the project in general, please do not hesitate to write or call me at 715/372-4866.

Sincerely,

Christopher A. Saari
Hydrogeologist

cc: Jon Hinkel - Twin Ports Testing, Inc.

TWIN PORTS TESTING, Inc.

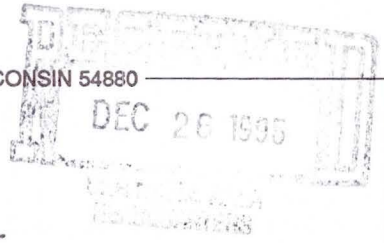
SINCE 1972



Page 1
(of 2)

TRANSMITTAL

1301 NORTH THIRD STREET • SUPERIOR, WISCONSIN 54880
FAX # (715) 392-7163 • (715) 392-7114



To: Chris Saari
Wisconsin DNR
P.O. Box 125
Brule, Wisconsin 54820

Date: 12/22/95
Job #: 599-95E-RA
Client: Norman & Donna Camenker
Project: Hughitt Slip Property

We are sending you: Enclosed Airmail Shop Drawings
 Separate Cover 1st Class Other Drawings
 By our Messenger Other Specifications
 By your Messenger Other

# OF COPIES	REPORT/PROPOSAL ID	LATEST DATE	DESCRIPTION OR REMARKS
①	Proposal / Work Plan -		Continuation of Cleanup Measures at the Hughitt Slip Property in Superior Wisconsin

THESE ARE TRANSMITTED as checked below:

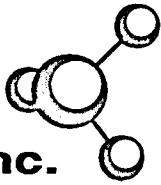
For approval As requested No Exception Taken Revise & resubmit
For your use For review & comment Make corrections noted Submit specified item

Remarks: Dear Chris,
Enclosed you will find a copy of TPT's proposal/workplan for continued work at the Hughitt Slip property. Please review the material and feel free to call me with any questions or comments you may have. As you and I discussed earlier, this work plan has been designed with a limited scope, and is intended to address the site's contamination in a reasonable manner, without incurring unnecessary expense or involvement. We would

COPIES TO: Norman and Donna Camenker
Encl. _____
Trans. _____

Sincerely,

(over)



SINCE 1972

TWIN PORTS TESTING, inc.

Page 2
of 2

TRANSMITTAL

1301 NORTH THIRD STREET • SUPERIOR, WISCONSIN 54880
FAX # (715) 392-7163 • (715) 392-7114

To: _____ Date: _____

Job #: _____

Client: _____

Project: _____

We are sending you: _____ Enclosed _____ Airmail _____ Shop Drawings
_____ Separate Cover _____ 1st Class _____ Other Drawings
_____ By our Messenger _____ Other _____ Specifications
_____ By your Messenger _____ Other

# OF COPIES	REPORT/PROPOSAL ID	LATEST DATE	DESCRIPTION OR REMARKS

THESE ARE TRANSMITTED as checked below:

For approval As requested No Exception Taken Revise & resubmit
For your use For review & comment Make corrections noted Submit specified item

Remarks: like to obtain a written approval from the
DNR for the workplan prior to the project's
commencement.
I look forward to hearing from you.
Thank you —

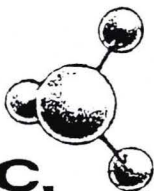
COPIES TO: _____ Encl. _____ Trans. _____

Sincerely,

Jon Hinkel
(218) 722-1911

TWIN PORTS TESTING INC.

SINCE 1972



1301 NORTH THIRD STREET • SUPERIOR, WISCONSIN 54880
(715) 392-7114 • FAX (715) 392-7163

728 GARFIELD AVENUE • DULUTH, MINNESOTA 55802
(218) 722-1911 • FAX (218) 722-3295

8 INDUSTRIAL PARK ROAD • NEGAUNEE, MICHIGAN 49866
(906) 226-6653 • FAX (906) 226-3699

December 21, 1995

Proposal 95P-183E

Norman and Donna Camenker
70 Highgate Ct.
Superior, Wisconsin 54880

(DNR File copy)

Re: Continuation of Remedial Action
Hughitt Slip Property
Superior, Wisconsin

Dear Mr. and Mrs. Camenker:

Since you and I last spoke, Mr. Chris Saari of the Wisconsin Department of Natural Resources (DNR) has responded to Twin Ports Testing, Inc.'s (TPT's) reports of the contamination encountered on the Hughitt Slip property in Superior, Wisconsin, in a correspondence, dated December 8, 1995. The correspondence indicated that the DNR's present concern regarding the property lies with the elevated contaminant concentrations remaining in the 3a excavation soils. Though no mention was made in the correspondence specifying a concern regarding the site's groundwater, it is TPT's opinion that the DNR site closure committee will require confirmation of groundwater integrity as well as confirmation of soil integrity for the property's sites before closure will be granted. Mr. Saari concurs with TPT's opinion (TPT telephone communication with Chris Saari, 12/12/95).

In an effort to better assess the soil conditions at each of the excavated sites, TPT recently directed the laboratory to re-evaluate the analyses results of the September excavation soil samples with regard to detection limits of the petroleum volatile organic compound (PVOC) parameters. The laboratory responded by reporting their detection limits for these parameters well below the original detection limits of 200 parts per billion (ppb; see laboratory report revision, attached). The revised laboratory reports indicate no detections of benzene for sites 1 and 2 at concentrations at or above 5 ppb. The analytical results for all parameter concentrations of the soil samples of sites 1 and 2 are thus confirmed to lie below DNR Interim Soil Cleanup Guidelines (see attached listing); no additional environmental work should be required at either of these sites by the DNR.

With regard to the individual sites of 3a, 3b and 3c, it appears that DRO and/or benzene concentration lie above or may lie above current DNR Interim Soil Cleanup Guidelines. Such results serve to indicate the need for further cleanup efforts as determined by the DNR.

WORK PLAN

TPT proposes enlarging the present excavations numbered 3a, 3b, and 3c in all directions in an effort to remove remaining contaminated soil. The excavations would be conducted using a backhoe as before, guided by a TPT Environmental Technician using a portable photoionization detector (PID) according to standard jar-headspace procedure. Laboratory conformation soil samples would be collected from the excavation's bases and sidewalls and transported to the laboratory according to standard chain-of-custody procedures. Excavated soils would be loaded directly into dump trucks for transport to an appropriate remediation/disposal facility. Any groundwater entering the excavations would be pumped into a tanker truck for disposal with an appropriately permitted agency or firm.

The excavations would be backfilled using uncontaminated soil imported from a separate locality. During backfilling, one to three screen - riser assemblies would be installed in the excavated area to serve as collection points for groundwater sampling. Efforts would be made to develop these temporary groundwater collections points as fully as possible, with one or more groundwater samples collected for submission to the laboratory.

Laboratory soil and groundwater samples would be analyzed for diesel range organics (DRO), petroleum volatile organic compounds (PVOC) and lead. Polynuclear aromatic hydrocarbon (PAH) analyses would be conducted for soil and groundwater samples collected from the general area of site 3a.

Following completion of the field work, a report would be prepared summarizing the project's methods and results for review by you as well as the DNR.

ESTIMATED COSTS

At present, TPT is in the process of gathering estimates from various firms and contractors for the excavation, hauling and disposal of the site's remaining contaminated soil; the pumping, trucking and disposal of any groundwater which may accumulate in the excavations during soil removal; and the delivery of backfill material. As the various estimates are received, TPT will make them available to you for comparison. Following your acceptance of the appropriate firms or contractors, TPT will schedule the field work and continue with the project as planned. Preliminary groundwater sampling and analysis is anticipated as a requisite to gaining a cost effective means of any wastewater disposal which may be necessary.

FIELD WORK

Contractor:

Excavation, and trucking: petroleum contaminated soil (est. 200 cubic yards or less)	\$ To be determined
Disposal: petroleum contaminated soil	\$ To be determined
Removal of wastewater from excavation (est. 2300 gallons or less)	\$ To be determined
Treatment/disposal: excavation wastewater	\$ To be determined

Environmental Consultant:

Preliminary groundwater sample collection; excavation monitoring; soil sample collection and field screening; screen-riser assembly installation(s); development and groundwater sample collection (Environmental Technician I: est. 12-15-hours)	\$ 552.00 - 690.00
Equipment and Supplies (vehicle, PID, sample jars, 1-3 screen-riser assemblies, 1-3 disposable bailers, lead filters, disposable sampling gloves)	\$ 214.00 - 338.00

LABORATORY ANALYSES

Soils:	
8-15 samples: DRO, PVOC, Lead	\$ 1171.00 - 2370.00
1-3 samples: PAH	
Groundwater (including field blank):	
2-4 samples: DRO, PVOC, Lead, PAH	\$ 465.00 - 803.00
1 sample: TPH, BTEX, Lead	

PROJECT MANAGEMENT/REPORTING

Environmental Consultant:

\$ 1190.00 - 1700.00

(Environmental Technician II, est.
20-30 hours; Environmental Dept.
Manager, est. 2 hours; Secretarial
Services)

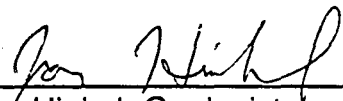
SCHEDULE

It is anticipated that the remainder of the cost estimates will be available within one week. Following your approval of the necessary contractors or firms, we anticipated that the project's field work may commence within two weeks thereafter. The project's final report should be available within one month of the field work's commencement.

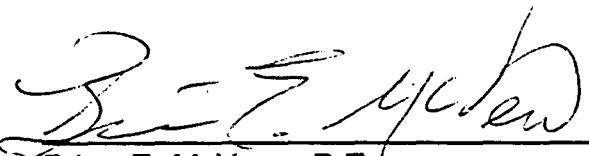
We appreciate the opportunity to submit this proposal and look forward to working with you on the project. If you have any questions regarding this proposal, please feel free to contact us at (906) 226-6653 or (218) 722-1911.

Sincerely,

TWIN PORTS TESTING, INC.



Jon Hinkel, Geologist



Brian E. McVean, P.E.
Environmental Department Manager

RJH:pjd

Attachments: Revised Laboratory Reports
DNR Interim Soil Cleanup Guidelines

This proposal is being provided to you in duplicate. If you agree to accept this proposal, along with the General Conditions of Service, please sign and return one copy to us to use as our authorization to proceed with this project.

Signed *Dona Camenker - Kenneth B Camenker*

Date *12/21/95*

Printed Name *DONA CAMENKER*

Title _____

Company _____



728 GARFIELD — NWE ■ DULUTH, MINNESOTA 55802
MN (218) 722-1911 ■ FAX (218) 722-3295

LAKE SUPERIOR LABORATORIES

A DIVISION OF TWIN PORTS TESTING, INC.

Date: 12/18/95

Client: Twin Ports Testing
Environmental Dept.
728 Garfield Avenue
Duluth, MN 55802

Attn: Jon Hinkel

Phone: (218) 722-1911

Fax: (218) 722-3295

Chain of Custody #: 13367

Project: Hughitt Slip Property

Project ID: 561-95E.RA

LAB ID #	SAMPLE ID
4392-95LS	SS1A
4393-95LS	SS2A
4394-95LS	SS3Aa
4395-95LS	SS3Ab
4396-95LS	SS3Ac

Signature _____

Linda Thiry
Linda Thiry, Director
Tim Buck, Lab Manager

REVISED
12/18/95

Wis. Certification Number: 816057440

Minn. Certification Number: 027-137-307

This cover page is the first of _____ pages

Quality Assurance / Quality Control Report

Client: Twin Ports Testing

Chain Of Custody #: 13367

Project: Hughitt Slip Property

Project ID: 561-95E.RA

QC Parameter	Blank	Soil Blank	Duplicate	Spike	Spike Duplicate	Soil Spike	Soil Spike Duplicate
DRO	NA	Pass	NA	NA	NA	Pass	Pass
BTEX/PVOC	NA	Pass	NA	NA	NA	Pass	Pass
INORGANICS	Pass	NA	NA	Pass	NA	NA	NA

Remarks

Client
 Twin Ports Testing
 Environmental Dept.
 728 Garfield Avenue
 Duluth, MN 55802

Project: Hughitt Slip Property
Project ID: 561-95E.RA

Collected By: R.J. Hinkel
Delivered By: R.J. Hinkel

Chem. Lab ID	4392-95LS	4393-95LS	4394-95LS
Sample Type	Soil	Soil	Soil
Collected	09/26/95	09/26/95	09/26/95
Received	09/28/95	09/28/95	09/28/95
Reported	12/18/95	12/18/95	12/18/95
Sample Description	SS1A	SS2A	SS3Aa

Analysis	Date Analyzed	MDL	4392-95LS	4393-95LS	4394-95LS
MTBE	10/04/95	25.0 ug/kg	ND α	ND	<200 ug/kg
Benzene	10/04/95	5.00 ug/kg	ND α	ND	<25.0 ug/kg
Toluene	10/04/95	25.0 ug/kg	ND α	ND	765 ug/kg
Ethylbenzene	10/04/95	25.0 ug/kg	ND α	ND	238 ug/kg
Total Xylenes	10/04/95	75.0 ug/kg	ND α	ND	251 ug/kg
1,3,5 Trimethylbenzene	10/04/95	25.0 ug/kg	ND α	ND	1310 ug/kg
1,2,4 Trimethylbenzene	10/04/95	25.0 ug/kg	ND α	ND	8410 ug/kg
Lead	10/11/95	10.0 mg/kg	ND	ND	254 mg/kg
Moisture	10/04/95	1.00 %	17.8 %	19.0 %	24.4 %
Diesel Range Organics	09/29/95	5.00 mg/kg	5.10 mg/kg	ND	4240 mg/kg α

Remarks

REVISED REPORT

4394-95LS Elevated detection limit due to dilution effect.

MDL \Rightarrow Method Detection Limit

ND \Rightarrow Not Detected at or above MDL

α \Rightarrow Analyzed On 10/03/95

Client
 Twin Ports Testing
 Environmental Dept.
 728 Garfield Avenue
 Duluth, MN 55802

Project: Hughitt Slip Property
Project ID: 561-95E.RA

Collected By: R.J. Hinkel
Delivered By: R.J. Hinkel

Chem. Lab ID	4395-95LS	4396-95LS	
Sample Type	Soil	Soil	
Collected	09/26/95	09/26/95	
Received	09/28/95	09/28/95	
Reported	12/18/95	12/18/95	
Sample Description	SS3Ab	SS3Ac	

Analysis	Date Analyzed	MDL		
MTBE	10/04/95	25.0 ug/kg	89.6 ug/kg	<200 ug/kg
Benzene	10/04/95	5.00 ug/kg	19.1 ug/kg	<10.0 ug/kg
Toluene	10/04/95	25.0 ug/kg	219 ug/kg	<200 ug/kg
Ethylbenzene	10/04/95	25.0 ug/kg	<200 ug/kg	<200 ug/kg
Total Xylenes	10/04/95	75.0 ug/kg	<200 ug/kg	<200 ug/kg
1,3,5 Trimethylbenzene	10/04/95	25.0 ug/kg	<200 ug/kg	<200 ug/kg
1,2,4 Trimethylbenzene	10/04/95	25.0 ug/kg	<200 ug/kg	<200 ug/kg
Lead	10/11/95	10.0 mg/kg	257 mg/kg	160 mg/kg
Moisture	10/04/95	1.00 %	28.2 %	27.3 %
Diesel Range Organics	09/29/95	5.00 mg/kg	11.8 mg/kg α	8.26 mg/kg

Remarks

REVISED REPORT

4395-95LS Elevated detection limit due to dilution effect.

4396-95LS Elevated detection limit due to dilution effect.

MDL \Rightarrow Method Detection Limit

ND \Rightarrow Not Detected at or above MDL

α \Rightarrow Analyzed On 10/03/95



728 GARFIELD AVENUE • DULUTH, MINNESOTA 55802
MN (218) 722-1911 • FAX (218) 722-3295

SERIAL NUMBER
No 13367

LABORATORY REQUEST AND
CHAIN OF CUSTODY RECORD

LAKE SUPERIOR LABORATORIES

A DIVISION OF TWIN PORTS TESTING, INC.

TPT #
561-95C.RA

Project Name Hughitt Slip Property No. _____ P.O.# _____

Client Norman & Donna Camenker Report To Jon Hinkel

Address _____

Bill To 561-75E.RA

Phone _____ Fax _____

Sampler Signature R. J. Hinkel

Sampler (Print) R. J. Hinkel

Remarks

Sample No./Location	Date	Time	Matrix			Number of Containers	Preservative	Analyses										LSL No.				
			Air	Liquid	Solid			DRG	PVOC	Pb												
SS 1A	9/26/95	3:52 pm			✓	3		✓	✓	✓												4392
SS 2A	9/26/95	4:20 pm			✓	3		✓	✓	✓												4393
SS 3Aa	9/26/95	5:00 pm			✓	3		✓	✓	✓												4394
SS 3Ab	9/26/95	5:10 pm			✓	3		✓	✓	✓												4395
SS 3Ac	9/26/95	5:20 pm			✓	3		✓	✓	✓												4396
Relinquished By <u>R. J. Hinkel</u>		Date/Time <u>9/28/95 4:05 pm</u>	Received By <u>[Signature]</u>		Date/Time <u>9-28-95</u>	Relinquished By		Date/Time	Received By													
Relinquished By		Date/Time	Received By		Date/Time	Relinquished By		Date/Time	Received By													

Turnaround Time: 2 Week 2-5 Day _____ or 24 Hour Rush _____ (additional charge)

Received April
1994

Table 1
HAZARDOUS SUBSTANCE/WASTE RELEASES:

INTERIM SOIL CLEANUP GUIDELINES--PETROLEUM CONTAMINATION

BTEX (1)	GRO/DRO	Soil Type (2)	DNR Closeout Action	
			Soils Accessible	Soils Inaccessible
<= NR 720	<= 100 ppm	Permeable (K > 10 E-6 cm/s)	Close	Close
<= NR 720	<= 250 ppm	Less Permeable (K <= 10 E-6 cm/s)	Close	Close
<= NR 720 or > NR 720	> applic. GRO/DRO		Require additional work unless not technically or economically feasible	Close with consideration of deed instrument according to guidelines

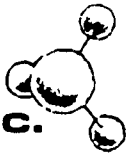
(1) BTEX: proposed criteria developed in preparation of NR 720:

Benzene 5.5 ug/kg
Toluene 1500 ug/kg
Ethylbenzene 2900 ug/kg
Xylenes 4100 ug/kg
1,2-DCA 4.9 ug/kg

(2) K: Saturated hydraulic conductivity

Since 1972

TWIN PORTS TESTING inc.



1301 NORTH THIRD STREET ■ SUPERIOR, WISCONSIN 54880 ■ (715) 392-7114

TWIN PORTS TESTING inc.

General Conditions of Service

These General Conditions of Service, including any Supplemental Conditions of Service which are or may become applicable to the services to be provided in the Proposal, are incorporated by reference into the foregoing Proposal and shall, if said Proposal is accepted by Client, be part of the Agreement under which services are to be performed by Twin Ports Testing, Inc.

SECTION 1: SCOPE OF WORK

- (a) It is understood that the scope of work and time schedule defined in the Proposal are based on the information provided by Client. If this information is incomplete or inaccurate, or if unexpected site conditions are discovered, the scope of work may change, even as the work is in progress. If the Client requests additional services or when a change in the scope of work or time schedule is necessary, a written amendment to the Agreement shall be executed by the Client and Twin Ports Testing, Inc. as soon as practicable and consent to such amendments shall not be unreasonably withheld.
- (b) The scope of work shall include all services provided by Twin Ports Testing, Inc., in its discretion which are reasonably necessary and appropriate for the effective and prompt fulfillment of Twin Ports Testing, Inc. obligations under the Agreement and all services shall be subject to the provisions of the Agreement, including these General Conditions and any supplemental conditions incorporated herein; it being expressly provided that all such services provided shall be invoiced and paid for in accordance with Section 3 below:

SECTION 2: CLIENT DISCLOSURES

- (a) It shall be the duty of the Client to notify Twin Ports Testing, Inc. of any known or suspected hazardous substances which are or may be related to the services to be provided. Such hazardous substances shall include but not be limited to any substance which poses or may pose a present or potential hazard to human health or the environment whether contained in a product, material, by-product, waste or sample and whether it exists in a solid, liquid, semi-solid or gaseous form, piping, electrical cables or similar objects, whether above ground or below ground. This duty shall also apply to any of the foregoing substances which Twin Ports Testing, Inc. may be provided or obtain or which exist or may exist on or near any premises upon which services are to be performed by Twin Ports Testing, Inc. employees, agents or contractors. The Client shall notify Twin Ports Testing, Inc. of all such hazardous substances of which it has knowledge or which it reasonably suspects exist upon entering into this Agreement. Thereafter, disclosure and notification to Twin Ports Testing, Inc. shall be required immediately upon discovery of any other hazardous substances or upon discovery of increased concentrations of previously disclosed substances where the increased concentration makes them hazardous.
- (b) Following any disclosure as set forth in the preceding paragraph, or if any hazardous substances are discovered or reasonably suspected by Twin Ports Testing, Inc. after its services are undertaken, Twin Ports Testing, Inc. may, at its discretion, discontinue its services. Whether or not Twin Ports Testing, Inc. discontinues its services in whole or in part, the Client and Twin Ports Testing, Inc. agree that the scope of services, schedule and the estimated fee or budget shall be adjusted in accordance with the disclosed information or condition, and Twin Ports Testing, Inc. may, at its discretion, terminate the Agreement. In the event that the Agreement is terminated pursuant to this Section, the Client shall pay Twin Ports Testing, Inc. for services and all termination expenses as set forth in Section 10 of this Agreement.
- (c) If all or any part of the scope of work is to be performed in the general vicinity of a facility or in an area where dust, fumes, gas, noise vibrations or other particulate or nonparticulate matter is in the atmosphere where it raises a potential health hazard or nuisance to those working in the area of such conditions, Client shall notify Twin Ports Testing, Inc. of such conditions, potential health hazard or nuisance and thereafter Twin Ports Testing, Inc. shall take all necessary and reasonable measures to protect its employees against such possible health hazards or nuisances. The reasonable direct cost of such measures shall be born by the Client.

SECTION 3: PAYMENT, INTEREST AND BREACH

- (a) Client agrees to pay invoices on receipt, and to pay interest on unpaid balances beginning thirty (30) days after invoice date at the rate of 1.5% per month, but not to exceed the maximum rate by law.
- (b) In the event Client fails to pay Twin Ports Testing, Inc. within sixty (60) days following the invoice date, Twin Ports Testing, Inc. may consider the default a total breach of this Agreement and may, at its option, terminate all of its duties without liability to Client or others.

SECTION 4: ACCESS AND RESTORATION

- (a) Client will furnish Twin Ports Testing, Inc. with access to the site. It is understood by Client that in the normal course of the work some damage to the site or materials may occur. While Twin Ports Testing, Inc. will take reasonable precautions to minimize damage, Twin Ports Testing, Inc. has not included the cost of restoration in the estimated charges and will not be liable for such damage. The correction of damage is the responsibility of Client. At Client's option, Twin Ports Testing, Inc. will restore the site and invoice the Client.

SECTION 5: SAMPLES

- (a) All samples remaining after tests are conducted will be discarded sixty (60) days after submission of the written report unless Client requests, in writing, that Twin Ports Testing, Inc. store or ship the samples, at Client's expense.

SECTION 6: REPORTS AND OWNERSHIP OF DOCUMENTS

- (a) Twin Ports Testing, Inc. shall furnish one (1) copy of each report to Client. Additional copies shall be furnished at the rates specified in the fee schedule. With the exception of Twin Ports Testing, Inc. Reports to Client, all documents, including original boring logs, field data, field notes, laboratory test data, calculations and estimates are and remain the property of Twin Ports Testing, Inc. Client agrees that all reports and other work furnished to the Client not paid for in full will be returned upon demand and will not be used for design, construction, permits or licensing.
- (b) Twin Ports Testing, Inc. will retain principal documents relating to the services performed for five (5) years following submission of the report.

SECTION 7: STANDARD OF CARE

- (a) Twin Ports Testing, Inc. represents that the services performed under this Agreement will be performed with the care and skill ordinarily exercised by reputable members of the profession practicing under similar conditions at the same time in the same or similar locality.
- (b) No other warranty, expressed or implied, is made or intended by rendition of consulting services or by furnishing oral or written reports of the findings made.
- (c) Any exploration, testing, surveys and analysis associated with the work will be performed by Twin Ports Testing, Inc. for the Client's sole use to fulfill the purpose of this Agreement and Twin Ports Testing, Inc. is not responsible for interpretation by others of the information developed. The Client recognizes that subsurface conditions beneath the Project site may vary from those encountered in borings, surveys or explorations and the information and recommendations developed by Twin Ports Testing, Inc. are based solely on the information available.
- (d) Twin Ports Testing, Inc. will not be responsible for the failure of others to perform in accordance with the specifications or contract documents, and Twin Ports Testing, Inc. services shall in no way relieve others of their responsibilities.
- (e) For work not on Twin Ports Testing, Inc. premises, Twin Ports Testing, Inc. will not be responsible for superintending, supervising or directing the work of contractors, sub-contractors, or others, or for job or site safety, those being the sole responsibility of others.
- (f) Twin Ports Testing, Inc. will not be responsible for either setting or checking the accuracy of construction staking, or for staking or referencing locations of piling, caissons or footings, unless those functions are specifically included in the accompanying description of services. Twin Ports Testing, Inc., will reference results of tests and observations to control lines and elevations set as part of surveying or construction staking by others.
- (g) Client shall be responsible for the cooperation of its employees and contractors in observing all radiation safety standards where radiographic or gamma ray equipment is employed.

SECTION 8: LIMITATION OF PROFESSIONAL LIABILITY

- (a) It is agreed that the Client will limit any and all liability, claim for damages, cost of defense, or expenses to be levied against Twin Ports Testing, Inc. on account of design defects, breach of contract, errors, omissions, or professional negligence to a sum not to exceed \$50,000 or the amount of Twin Ports Testing, Inc. fee, whichever is greater.
- (b) The Client further agrees to notify any contractor or subcontractor who may perform work in connection with any design, report or study prepared by Twin Ports Testing, Inc. of such limitation of professional liability for design defects, breach of contract, errors, omissions or professional negligence and require as a condition precedent to their performing their work a like limitation of liability on their part as against Twin Ports Testing, Inc.
- (c) Documents, including but not limited to, technical reports, original boring logs, field data, field notes, laboratory test data, calculations, and estimates furnished to the Client or its agents pursuant to this agreement are not intended or represented to be suitable for reuse by the Client or others on extensions of the Project or on any other project. Any reuse without Twin Ports Testing, Inc. written consent will be at Client's sole risk and without liability or legal exposure to Twin Ports Testing, Inc. or to Twin Ports Testing, Inc. contractor(s) and client shall indemnify and hold harmless Twin Ports Testing, Inc. and Twin Ports Testing, Inc. contractor(s) from all claims, damages, losses and expenses including attorney's fees arising out of or resulting therefrom.
- (d) Under no circumstances shall Twin Ports Testing, Inc. be liable for extra work or other consequences due to changed conditions or for costs related to failure of the construction contractor or materialmen or service providers to install work in accordance with the plans and specifications.
- (e) Client agrees to hold harmless, indemnify, and defend Twin Ports Testing, Inc. from and against any and all claims, losses, damages, liability and costs, including but not limited to costs of defense, arising out of this Agreement, whether insured or not, excepting only such liability as may arise out of the sole negligence of Twin Ports Testing, Inc. in the performance of services under this Agreement.

SECTION 9: LIABILITY INSURANCE

- (a) Twin Ports Testing, Inc. represents that it and its agents, and consultants employed by it, is and are protected by Worker's Compensation insurance and that Twin Ports Testing, Inc. has coverage under liability insurance policies which Twin Ports Testing, Inc. deems reasonable and adequate. Twin Ports Testing, Inc. shall furnish certificates of insurance upon request. Within the limits and conditions of the insurance, and subject to the provisions of any Supplemental Conditions of service applicable to services involving or related to hazardous substances or constituents, including hazardous waste, Twin Ports Testing, Inc. agrees to indemnify and save harmless the Client from and against bodily injury and property damage losses arising directly from any negligent acts by Twin Ports Testing, Inc., its employees, agents and consultants employed by it. Twin Ports Testing, Inc. shall not be responsible for bodily injury and property damage losses arising from acts by the Client, its employees, agents, staff, consultants or subcontractors employed by it or by any other person or combination of persons. The Client agrees to limit the liability of Twin Ports Testing, Inc. to the limits of Twin Ports Testing, Inc. insurance. The Client is responsible for requesting specific inclusions or limits of coverage that are not present in Twin Ports Testing, Inc. insurance, the cost of such inclusions or coverage increased, if available, to be at the expense of the Client.

SECTION 10: TERMINATION

- (a) This Agreement may be terminated by either party upon at least seven (7) days written notice in the event of substantial failure by the other party to perform in accordance with the terms hereof through no fault of the terminating party. Such termination shall not be effective if that substantial failure has been remedied before expiration of the period specified in the written notice. The only exceptions to this seven-day written notice condition are Twin Ports Testing, Inc. rights to terminate this Agreement as set forth in Section 2. of the Agreement or to terminate this Agreement immediately if conditions making it more difficult than anticipated to drill at the specified locations are encountered which are not made known to Twin Ports Testing, Inc. prior to its arrival at the Project site. If this Agreement is terminated, Twin Ports Testing, Inc. shall be paid for services performed prior to the termination date set forth in the notice plus termination expenses. Termination expenses shall include personnel and equipment rescheduling and reassignment adjustments and all other related costs incurred directly attributable to termination.

SECTION 11: SEVERABILITY

- (a) In the event that any provision herein shall be deemed invalid or unenforceable, the other provisions hereof shall remain in full force and effect, and binding upon the parties hereto.

SECTION 12: SECTION HEADINGS

- (a) The heading or title of a section is provided for convenience and information and shall not serve to alter or affect the provisions included herein.

SECTION 13: SURVIVAL

- (a) All obligations arising prior to the termination of this Agreement and all provisions of this Agreement allocating responsibility or liability between the Client and Twin Ports Testing, Inc. shall survive the completion of services and the termination of this Agreement.

T Koehn
FYI
Susie

12/15/95

I.D. # 170

District: NWD County: Douglas (16)
 Site Name: Hughitt Slip Property
 Address: _____
 Legal Municipality: Superior, City of
 Date of Discovery: 08/29/95

Case No.: _____ PMN: _____
 FID: 816105400
 Proj. Mgr: C. Saari
 Support Person: _____
 Legal Desc: SE 1/4 NE 1/4 Sec 10, T 49, R 14
 Lat: N _____ Long: W _____
 Date of RP Contact: 12/08/95

PRIORITY SCREENING: <input checked="" type="checkbox"/> 1 = High <input type="checkbox"/> 3 = Low <input type="checkbox"/> 4 = Unknown	FUNDING SOURCE: <input checked="" type="checkbox"/> 1 = RP <input type="checkbox"/> 2 = LTF <input type="checkbox"/> 3 = EF <input type="checkbox"/> 4 = SF <input type="checkbox"/> 5 = Ncne <input type="checkbox"/> 6 = Other (Describe in Comments) <input type="checkbox"/> 7 = EPA Emergency Resp.	ENFORCEMENT AUTHORITY: <input checked="" type="checkbox"/> 1 = Spill Law s. 144.76, Wis. Stats. <input type="checkbox"/> 2 = Envir Repair Law s. 144.442, Wis. Stats. <input type="checkbox"/> 3 = Hazardous Waste Rules NR 600 Series <input type="checkbox"/> 4 = Solid Waste Rules NR 500 Series <input type="checkbox"/> 5 = CERCLA <input type="checkbox"/> 6 = Abandoned Container s. 144.77, Wis. Stat. <input type="checkbox"/> 7 = Other (Describe in Comments)
PRE-SCORE _____		

PROGRAMS INVOLVED: (L - LEAD S - SUPPORT)

<input type="checkbox"/> Aban Containers	<input type="checkbox"/> NR 500 Solid Waste	<input type="checkbox"/> Water Supply
<input type="checkbox"/> Lust	<input type="checkbox"/> Spills	<input type="checkbox"/> Water Resources Mgt
<input type="checkbox"/> NR 600 Hazardous Waste	<input type="checkbox"/> Superfund	<input checked="" type="checkbox"/> Env. Repair

RESPONSIBLE PARTY:

Business Name: _____	Business Name: _____
Owner/Mgr.: <u>Norman & Donna Camenker</u>	Owner/Mgr.: _____
Address: <u>70 Highgate Court</u>	Address: _____
<u>Superior WI 54880</u>	
Phone: <u>715 / 392-5457</u>	Phone: _____ / _____
Contact Person: <u>Same</u>	Contact Person: _____

	KNOWN IMPACTS (X)	POTENTIAL IMPACTS (X)
No Threat	_____	_____
Fire/Explosion threat (1)	_____	_____
Contaminated Private Well (2)	_____	_____
Contaminated Public Well (3)	_____	_____
Groundwater Contamination (4)	_____	_____ X _____
Soil Contamination (5)	_____ X _____	_____
Direct Contact (1-0)	_____	_____
Contaminated Surface Water (7)	_____	_____ X _____
Contaminated Air (8)	_____	_____
Other (6)	_____	_____

CONSULTANT INFORMATION:

Company: <u>Twin Ports Testing, Inc.</u>	Company: _____
Contact Person: <u>Jon Hinkel</u>	Contact Person: _____
Address: <u>728 Garfield Ave.</u>	Address: _____
<u>Duluth, MN 55802</u>	
Phone: <u>218 / 722-1911</u>	Phone: _____ / _____

List additional on separate sheet & attach.)

DATE:

**SUPERIOR DNR OFFICE
1705 TOWER AVENUE
SUPERIOR WI 54880
PHONE: 715/392-7988
FAX: 715/392-7993**

TO BRULE:		TO SPOONER:	
	L. WIESNER		G. LEROY
	D. ANDERSON		D. KAFURA
X	C Saari		J. ROSS

TO BAYFIELD:		TO MADISON:	
	B. SWANSON		B. HAGMAN - AM/10
	S. SCHRAM		J. CONNELLY - SW/3
	M. HALVORSON		L. SRIDARAN - SW/3

TO PARK FALLS:		TO OTHER:	
	W. WASKO		

FROM:

- FOR YOUR INFORMATION
- FOR YOUR COMMENTS
- FOR YOUR APPROVAL
- ROUTE AND RETURN TO ME
-

COMMENTS:

Spill ID Number

Y Y M M D D 0-99

Date of Incident 8-29-95	Day of Week Tuesday	Time of Incident 4:00	<input type="checkbox"/> A.M. <input checked="" type="checkbox"/> P.M.	Reported By (Name) John Hinckle	Telephone Number ()
Date Reported 8-30-95	Day of Week Wednesday	Time Reported 9:00	<input checked="" type="checkbox"/> A.M. <input type="checkbox"/> P.M.	Agency or Firm Reporting Twin Ports Testing	Reported thru Div. Emergen. Gov't. <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Substance Involved Waste Oil		Quantity Unknown	Units	Person or Firm Responsible unknown (Property owner-Norm & Dona Camenker)	
Substance Involved		Quantity	Units	Contact Name Dona Camenker	Telephone Number (715) 392-5457

Physical Characteristics <input type="checkbox"/> Solid <input type="checkbox"/> Liquid <input type="checkbox"/> Semisolid <input type="checkbox"/> Gas	Color _____ Odor _____	Address - Street or Route 70 Highgate court
		City, State, Zip Code Superior WI 54850

Cause of Incident unknown	Action Taken By Spiller <input type="checkbox"/> No Action Taken <input type="checkbox"/> No Notification <input checked="" type="checkbox"/> Investigate
Exact Location Description (intersection, mileage, etc.) Hewitt slip	<input type="checkbox"/> Containment; Type _____ <input checked="" type="checkbox"/> Cleanup; Method <u>Probably excavate & treat</u>
County Location Douglas	<input type="checkbox"/> Amount Recovered _____ <input type="checkbox"/> Monitor _____ <input type="checkbox"/> Contractor Hired; Name _____ <input type="checkbox"/> Other Action _____

DNR Dist NWD	DNR Area Brule	Groundwaters Affected <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Potential	Name of Surface Water St. Louis River
Surface Waters Affected <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Potential	Spill Location <input type="checkbox"/> Industrial Facility/Paper Mill/Chem. Co. <input type="checkbox"/> Gas/Service Station/Garage, Auto Dealer, Repair Shop <input type="checkbox"/> Ag Coop/Facility/Cheese Factory/Creamery <input type="checkbox"/> Other Small Business (bank, grocery, insurance co., etc.) <input type="checkbox"/> Public Property (city, county, state, church, school, etc.) <input type="checkbox"/> Utility Co., Power Generating/Transfer Facility <input type="checkbox"/> Private Property (home/farm) <input type="checkbox"/> Pipeline, Terminal, Tank Farm, Oil Jobber/Wholesaler <input type="checkbox"/> Transportation Accident, Fuel Supply Tank Spill <input type="checkbox"/> Transportation Accident, Load Spill <input checked="" type="checkbox"/> Other <u>Boat slip</u>		

Date District Notified 8-30-95	Day of Week Wednesday	Time District Notified 8:10	<input checked="" type="checkbox"/> A.M. <input type="checkbox"/> P.M.
District Person Notified Jim Bosch	Telephone Number (715) 635-4058		
Date Investigated Not	Day of Week	Time Investigated	<input type="checkbox"/> A.M. <input type="checkbox"/> P.M.
Person Investigating	Telephone Number ()		

Action Taken By DNR <input checked="" type="checkbox"/> No Action Taken <input type="checkbox"/> Investigation <input type="checkbox"/> Supervise/Conduct Cleanup	Spiller Required To Take Action; Type _____ <input type="checkbox"/> Contractor Hired By DNR; Name _____ <input type="checkbox"/> Amount Recovered _____ <input type="checkbox"/> 29.29 Enforcement
--	--

Other Agencies on Scene Local _____ State _____ Federal _____	Spilled Substance Destination <input type="checkbox"/> Air <input checked="" type="checkbox"/> Soil <input checked="" type="checkbox"/> Groundwater <u>Ground water is only 3-4 feet deep</u> <input type="checkbox"/> Surface Water <input type="checkbox"/> Storm Sewer <input type="checkbox"/> Sanitary Sewer <input type="checkbox"/> Contained/Recovered <input type="checkbox"/> Other _____
--	---

Person Filing This Report (print name) Steve LaValley	Signature 	Date Signed 8-30-95
--	---------------	------------------------

Additional Comments:
Twin Ports, while doing an environmental assessment, detected several minor spills of what appears to be waste oil. The consultant was told that he should contact DNR if it was a non-emergency when they called the spill # 1-800-943-0003. The spills are probably the result of illegal dumping.

PREPARER



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Brule Area Headquarters
6250 South Ranger Road
P.O. Box 125
Brule, WI 54820-0125
TELEPHONE 715-372-4866
TELEFAX 715-372-4836

George E. Meyer
Secretary

December 8, 1995

FILE COPY

MR AND MRS NORMAN CAMENKER
70 HIGHGATE ROAD
SUPERIOR WI 54880

SUBJECT: Petroleum Contamination at the Hughitt Slip Property, Superior, Wisconsin

Dear Mr. and Mrs. Camenker:

The Department has received the Phase II Sampling and Testing Results, prepared for the above named site by Twin Ports Testing, Inc. (TPT) and dated September 12, 1995, and the Preliminary Results - Remedial Action, also prepared by TPT and dated November 29, 1995. These reports describe investigative and remedial actions taken by TPT in response to environmental contamination encountered on this property during a Phase I investigation.

Based on the information we have received, the Department believes that you are responsible for restoring the environment at this site under Section 144.76, Wisconsin Statutes, known as the hazardous substances spills law. Your responsibilities include investigating the extent of the contamination, and then selecting and implementing the most appropriate remedial action. Enclosed is information to help you understand what you need to do to ensure your compliance with the spills law.

The purpose of this letter is twofold: 1) to describe your legal responsibilities, and 2) to provide you with the results of the Department's review of the work that has been completed to date.

Legal Responsibilities:

Your legal responsibilities are defined both in statute and in administrative rules. The hazardous substances spill law, Section 144.76 (3), Wisconsin Statutes, states:

- * **RESPONSIBILITY.** A person who possesses or controls a hazardous substance which is discharged or who causes the discharge of a hazardous substance shall take the actions necessary to restore the environment to the extent practicable and minimize the harmful effects from the discharge to the air, lands, or waters of the state.

Wisconsin Administrative Codes NR 700 through NR 728 establish requirements for emergency and interim actions, public information, site investigations, design and operation of remedial action systems, and case closure. Chapter NR 708 includes provisions for immediate actions in response to limited contamination. Wisconsin Administrative Code NR 140 establishes groundwater standards.

Department Review of Previous Work:

After reviewing the reports submitted by TPT, it is apparent that additional remedial actions are necessary here. The sample collected at the base of excavation 3a contained DRO levels in excess of the ch. NR 720, Wis. Adm. Code, soil cleanup standards. You should work with TPT to formulate a plan to fully define and remediate the contamination remaining at this site, and to properly treat or dispose of the excavated contaminated soil in accordance with ch. NR 718, Wis. Adm. Code.

Due to the number of contaminated sites and our staffing levels, we will be unable to respond to each report. To maintain your compliance with the spills law and chs. NR 700 through NR 728, do not delay the investigation and cleanup by waiting for DNR responses. We have provided detailed technical guidance to environmental consultants. Your consultant is expected to be familiar with our technical procedures and administrative codes and should be able to answer your questions on meeting Wisconsin's cleanup requirements.

Your correspondence and reports regarding this site should be sent to the Department at the following address:

FILE COPY
Christopher A. Saari
WDNR Brule Area Headquarters
6250 S. Ranger Rd.
PO Box 125
Brule, WI 54820-0125

Unless otherwise requested, please send only one copy of all plans and reports. Correspondence should be identified with the assigned DNR identification number which will be assigned to your site within 7 days.

Additional Information:

If you are interested in obtaining the protection of limited liability under s. 144.765, Stats., please contact the Contaminated Land Recycling Program at (800) 367-6076 (instate long distance) or (608) 264-6020 (local or out of state), in the Department of Natural Resources' Madison office for more information. The liability exemption under s. 144.765 Stats., is available to persons who meet the definition of "purchaser" in s. 144.765 (1)(c) and receive Department approval for the response actions taken at the property undergoing cleanup. The Department will determine eligibility for this program on a case-by-case basis, prior to the "purchaser" developing a scope of work for conducting a ch. NR 716 site investigation at the property.

If you have any questions about this letter or your responsibilities, please call me at (715) 372-4866.

Thank you for your cooperation.

Sincerely,



Christopher A. Saari
Hydrogeologist

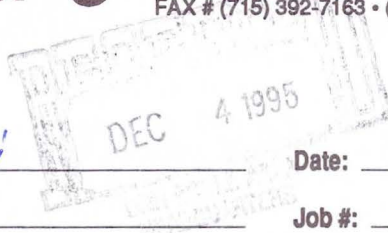
Attach.

cc: Jon Hinkel - Twin Ports Testing, Inc.



1301 NORTH THIRD STREET • SUPERIOR, WISCONSIN 54880
 FAX # (715) 392-7163 • (715) 392-7114

TRANSMITTAL



To: Chris Saari
WDNR
P.O. Box 125
Brule, Wisconsin 54820

Date: 12/1/95
 Job #: 561-95E-RA
 Client: Norman & Donna Comenker
 Project: Hughtt Ship Property:
clean-up

We are sending you: Enclosed Airmail Shop Drawings
 Separate Cover 1st Class Other Drawings
 By our Messenger Other Specifications
 By your Messenger Other

# OF COPIES	REPORT/PROPOSAL ID	LATEST DATE	DESCRIPTION OR REMARKS
①	Phase II Results Report		

THESE ARE TRANSMITTED as checked below:

For approval As requested No Exception Taken Revise & resubmit
 For your use For review & comment Make corrections noted Submit specified item

Remarks: Dear Chris,
Please attach the enclosed report as an appendix piece
to the "Preliminary Results - Remedial Action" report I mailed
to you yesterday. I suspect that the copy you were
mailed is missing this material.
Thank you

COPIES TO: (Norman & Donna Comenker) Encl. _____ Trans. _____

 Sincerely,
Jon Hinkel

TWIN PORTS TESTING INC.

SINCE 1972



1301 NORTH THIRD STREET SUPERIOR, WISCONSIN 54880
(715) 392-7114 • FAX (715) 392-7163

729 GARFIELD AVENUE • DULUTH, MINNESOTA 55802
(218) 722-1911 • FAX (218) 722-3295

8 INDUSTRIAL PARK ROAD • NEGAUNEE, MICHIGAN 49866
(906) 226-6653 • FAX (906) 226-3699

September 12, 1995
TPT # 552-95E.MM

Mrs. Donna Camenker
70 Highgate Road
Superior, Wisconsin 54880
Phone: (715) 392-5457

Re: Phase II Sampling and Testing Results
Hughitt Slip Property
Superior, Wisconsin

Dear Mrs. Camenker:

Twin Ports Testing, Inc. (TPT) is pleased to provide the following results of the Phase II soil sampling and testing investigation conducted at the Hughitt Slip property (Lots 1-9, Block 3, of the West Superior 8th Division) in Superior, Wisconsin (Figure 1). The Phase II investigation followed from recommendations listed in a Phase I Environmental Property Assessment completed for the property in August, 1995 (TPT # 539-95E.PI) and was conducted according to the Work Plan outlined in TPT Proposal # 95P-115E.

METHODS

Field work of the Phase II investigation was conducted August 24, 1995. Soil samples were collected by TPT environmental technicians from the three areas of ground staining identified on the Hughitt Slip property in the Phase I report (Figure 2). The soil samples were collected at approximately one foot deep each using hand spades, and screened in the field for petroleum related organic vapors using a portable photoionization detector (PID). As the northern-most area of ground staining exhibited a series of more widely spaced stains, soil samples were collected and screened from three points in the area. Results of the field screening revealed organic vapor concentrations ranging from 0.0 to 51 parts per million (ppm) throughout the sample suite (Table 1).

Laboratory samples were analyzed from each of the three separate areas of ground staining for diesel range organics (DRO); petroleum volatile organic compounds (PVOC); lead, cadmium and chromium (Pb, Cd, Cr); and polychlorinated biphenyls (PCB).

RESULTS

Results of the analyses revealed moderate to high concentrations of diesel range organics (45.1-10,300 ppm); various minor detections of several specific petroleum related compounds; minor to moderate concentrations of chromium (9.05 - 6.51 ppm); and moderate to moderately high concentrations of lead (46.5 - 222 ppm). No cadmium or polychlorinated biphenyl concentrations were detected within the sample suite (Table 2).

65.1

REMARKS

In consideration of the elevated concentration of lead indicated in the SS1 soil sample, an additional lead analysis involving toxicity characteristics leaching procedure (TCLP) is recommended for the SS1 sampling area. Should results of the TCLP analysis indicate a leachable lead concentration above 5 ppm, soil from that area will be classified as hazardous waste and must be disposed of accordingly. Assuming the concentration of leachable lead is found to lie below 5 ppm, soil from that area may be considered as nonhazardous, and may be disposed of by conventional means, such as thermal treatment.

In consideration of the high concentration of diesel range organics, but low concentrations of petroleum volatile organic compounds in the area of SS1, a potential exists for significant concentrations of polynuclear aromatic hydrocarbons (PAH) to be present at the site also. Testing for PAH concentration at the site following site remediation is recommended as such data will probably be required for site closure by the WDNR.

Presently, it appears that the speediest and most cost effective remediation alternative for the three spill sites on the Hughitt Slip property may be over-excavation of the contaminated soil, and disposal by thermal treatment at a local plant. This alternative may be applied to all three sites as long as none of the site's soils are classified as hazardous (to be determined pending a TCLP analysis of the SS1 area soil). Following the excavations of the three areas, confirmation soil samples should be collected from the excavation boundaries and analyzed for diesel range organics and petroleum volatile organic hydrocarbons, with polynuclear aromatic hydrocarbon testing included among the analyses for the SS1 site. The excavations would then be backfilled using "clean" soil. Should the project progress as suggested above, with no soil contamination remaining at the sites and no evidence of groundwater contamination encountered, the three sites would be eligible for Wisconsin Department of Natural Resources (DNR) closure (no further work required).

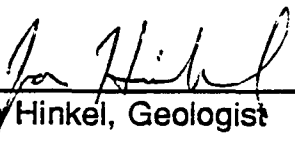
It should be noted however, that project complications could arise which may require additional efforts and resources in order to achieve DNR site closure. Such complications could include a determination of any of the contaminated soils as hazardous, an indication

of groundwater contamination at any of the sites, or the finding of evidence of additional contamination beyond that associated with the identified spill sites.

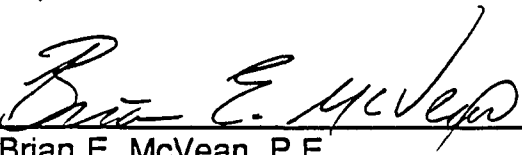
If you have any questions regarding the findings of this Phase II investigation, or TPT's recommendations please feel free to contact us at 722-1911.

Sincerely,

Twin Ports Testing, Inc.



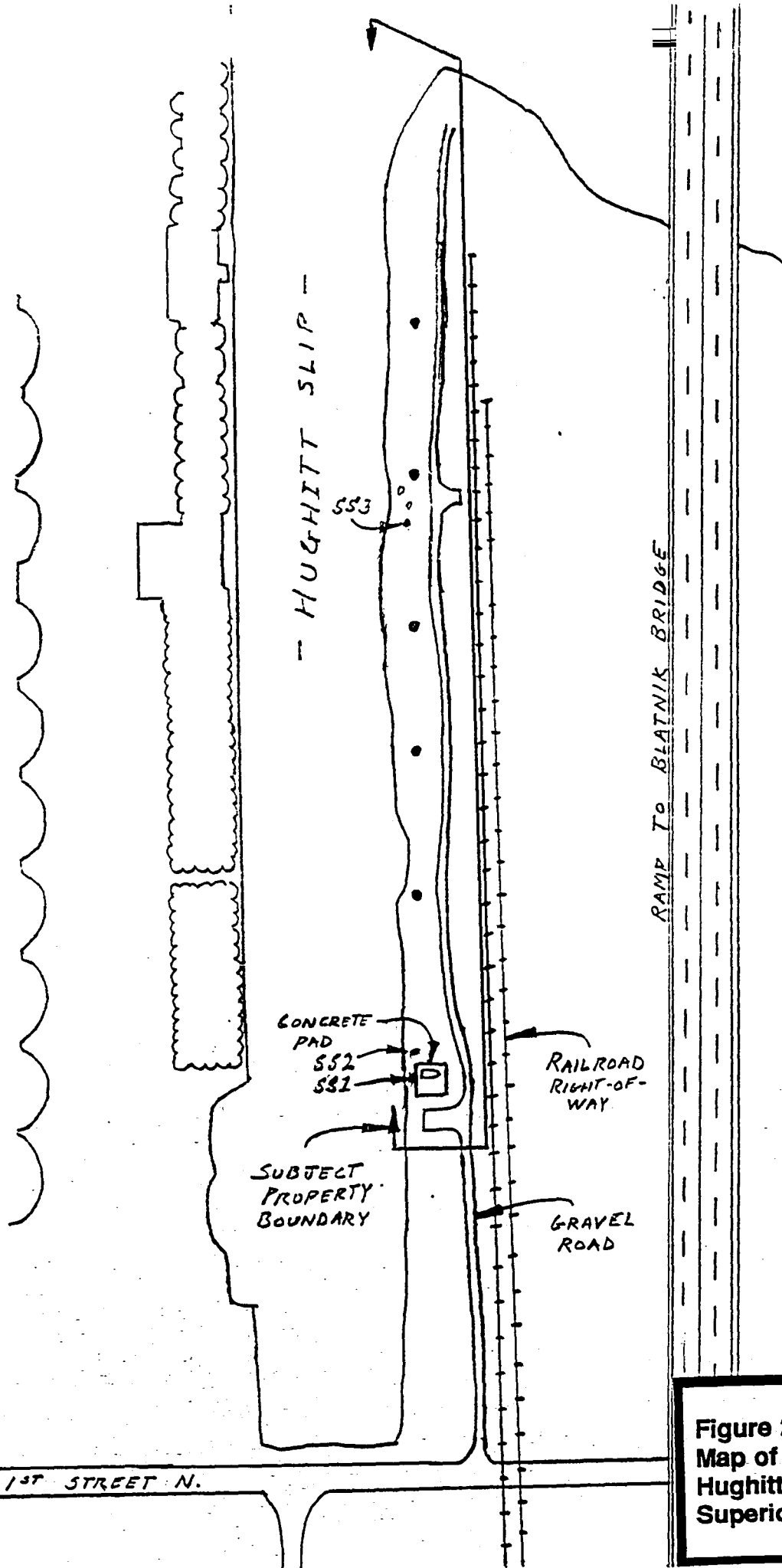
Jon Hinkel, Geologist



Brian E. McVean, P.E.
Environmental Department Manager

JH:dk

Attachments: Property Location Map
 Sampling Location Map
 Table 1: Field Screening Results
 Table 2: Laboratory Analysis Results
 Laboratory Report



- MORING CLEAT
- SS_ • SOIL SAMPLING LOCATION

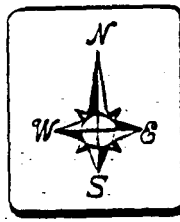


Figure 2
Map of Soil Sampling Locations
Hughtitt Slip Property
Superior, Wisconsin

TABLE 1

**Field Screening Results
Phase II Soil Sampling
Hughitt Slip Property
Superior, Wisconsin**

Sampling Location	Field Screening Sampling Number	PID Reading (ppm)
South Site Adjacent to Concrete Pad	SV-1	51
South Site Approx. 36 ft. North of Concrete Pad	SV-2	0.0
North Site Near Vehicle Turnaround	SV-3	5.0
	SV-4	0.0
	SV-5	0.0

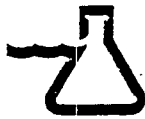
PID = photoionization detector

TABLE 2

**Laboratory Analyses Results
Phase II Soil Sampling
Hught Slip Property
Superior, Wisconsin**

Parameter	Soil Sample Number Sampling Location Concentration in ppm			Wisconsin DNR Interim Soil Cleanup Guideline	Concentration Requiring Additional Analyses (TCLP)
	SS1 south site adjacent to concrete pad	SS2 south site approx. 36 ft. north of concrete pad	SS3 north site near vehicle turnaround		
Diesel Range Organics	10,300	45.1	456	100	--
Toluene	0.372	<	<	1.5	--
Xylenes	1.09	0.373	0.386	4.1	--
1,3,5-trimethylbenzene	0.990	<	<	--	--
1,2,4-trimethylbenzene	0.874	<	0.232	--	--
Lead	222	92.9	46.5	--	100
Chromium	16.1	65.1	9.05	--	100

ppm = parts per million, equivalent to milligrams per kilogram, or mg/kg
 < = concentration below laboratory method detection limits
 -- = guideline not established
 TCLP = toxicity characteristics leaching procedure



728 GARFIELD AVENUE ■ DULUTH, MINNESOTA 55802
MN (218) 722-1911 ■ FAX (218) 722-3295

LAKE SUPERIOR LABORATORIES

A DIVISION OF TWIN PORTS TESTING, INC.

Date: 09/07/95

Client: Twin Ports Testing
Environmental Dept.
728 Garfield Avenue
Duluth, MN 55802

Attn: Jon Hinkel

Phone: (218) 722-1911

Fax: (218) 722-3295

Chain of Custody #: 13243

Project: Hughitt Slip

Project ID: 552.95E.MM

LAB ID #	SAMPLE ID
3952-95LS	SS1 (1')
3953-95LS	SS2 (1')
3954-95LS	SS3 (1')

Signature

Linda Thiry, Director
Tim Buck, Lab Manager

Wis. Certification Number: 816057440

Minn. Certification Number: 027-137-307

This cover page is the first of _____ pages

Quality Assurance / Quality Control Report

Client: Twin Ports Testing

Chain Of Custody #: 13243

Project: Hughitt Slip

Project ID: 552.95E.MM

QC Parameter	Blank	Soil Blank	Duplicate	Spike	Spike Duplicate	Soil Spike	Soil Spike Duplicate
DRO	NA	Pass	NA	NA	NA	Pass	Pass
PVOC	NA	Pass	NA	NA	NA	Pass	Pass
PCB'S	Pass	NA	Pass	Pass	NA	NA	NA
INORGANICS	Pass	NA	Fail	Pass	NA	NA	NA

Remarks For Chromium : Duplicate RPD = 41.4%.
For Lead : Duplicate RPD = 56.3%.

Client
Twin Ports Testing
Environmental Dept.
728 Garfield Avenue
Duluth, MN 55802

Project: Hughitt Slip
Project ID: 552.95E.MM

Collected By: Mark Darby / Mark Udd
Delivered By: Mark Darby

Chem. Lab ID	3952-95LS	3953-95LS	3954-95LS
Sample Type	Soil	Soil	Soil
Collected	08/24/95	08/24/95	08/24/95
Received	08/24/95	08/24/95	08/24/95
Reported	09/07/95	09/07/95	09/07/95
Sample Description	SS1 (1')	SS2 (1')	SS3 (1')

Analysis	Date Analyzed	MDL	3952-95LS	3953-95LS	3954-95LS
MTBE	08/28/95	0.200 mg/kg	ND	ND	ND
Benzene	08/28/95	0.200 mg/kg	ND	ND	ND
Toluene	08/28/95	0.200 mg/kg	0.372 mg/kg	ND	ND
Ethylbenzene	08/28/95	0.200 mg/kg	ND	ND	ND
Total Xylenes	08/28/95	0.200 mg/kg	1.09 mg/kg	0.373 mg/kg	0.386 mg/kg
1,3,5 Trimethylbenzene	08/28/95	0.200 mg/kg	0.990 mg/kg	ND	ND
1,2,4 Trimethylbenzene	08/28/95	0.200 mg/kg	0.874 mg/kg	ND	0.232 mg/kg
Lead	08/31/95	5.00 mg/kg	222 mg/kg	92.9 mg/kg	46.5 mg/kg
Moisture	08/28/95	1.00 %	15.1 %	22.7 %	30.5 %
Cadmium	09/01/95	1.000 mg/kg	ND	ND	ND
Chromium	09/01/95	5.00 mg/kg	16.1 mg/kg	65.1 mg/kg	9.05 mg/kg
Diesel Range Organics	08/25/95	5.00 mg/kg	10300 mg/kg	45.1 mg/kg	456 mg/kg
PCB's, total	08/25/95	0.024 mg/kg	ND	ND	ND

Remarks

MDL ⇒ Method Detection Limit
ND ⇒ Not Detected at or above MDL

SAMPLE CONDITION UPON RECEIPT CHECKLIST

Project: Hugh. H Slip

Client: TPT-E

Date Received: 8/24/95

COC #: 13243

Samples Received By: 44

Hanson
(Signature)

- | | Yes | No |
|--|-------------|-------------|
| 1. Is there a chain of custody (COC) or letter stating information contained on a COC? | <u>X</u> | <u> </u> |
| 2. Is the date and time relinquished in agreement with that written on the letter or COC? | <u>X</u> | <u> </u> |
| 3. Do the samples received agree with the COC or accompanying paperwork (i.e. number of samples, matrices, sample tags, sample containers, analyses, etc.)? | <u>X</u> | <u> </u> |
| 4. Are all the samples within the holding times for requested analyses? Communicate any lapse of greater than 4 days beyond date of collection for VOA analysis. | <u>X</u> | <u> </u> |
| 5. Are all the sample containers intact (i.e., not broken, leaking, etc.)? | <u>X</u> | <u> </u> |
| 6. Did the samples arrive on ice? | | <u>NA</u> |
| a) What temperature did the samples arrive at? | <u>NA</u> | <u> </u> |
| b) Are the samples at the proper temperature? | <u> </u> | <u>NA</u> |
| 7. Is there enough sample to do all the analyses? | <u>X</u> | <u> </u> |
| 8. Are the samples preserved correctly? | <u>X</u> | <u> </u> |
| 9. Are the VOA vials head-space free? | <u> </u> | <u>NA</u> |

'NO' Items Explained:

SINCE 1972



TWIN PORTS TESTING INC.

1301 NORTH THIRD STREET PERIOR, WISCONSIN 54880
(715) 392-7114 • FAX (715) 392-7163

728 GARFIELD AVENUE • DULUTH, MINNESOTA 55802
(218) 722-1911 • FAX (218) 722-3295

8 INDUSTRIAL PARK ROAD • NEGAUNEE, MICHIGAN 49866
(906) 226-6653 • FAX (906) 226-3699

November 29, 1995
TPT #561-95E.RA

Wisconsin Department of Natural Resources
P.O. Box 125
Brule, Wisconsin 54820

Attn: Mr. Chris Saari

Re: Preliminary Results - Remedial Action
Hughitt Slip Property
Superior, Wisconsin



Dear Mr. Saari:

Twin Ports Testing, Inc. (TPT) is conducting the clean-up of a series of minor petroleum spill sites on a property located adjacent to the Hughitt Slip in Superior, Wisconsin (Figures 1 and 2). The project has resulted from the investigation of three areas of surficial ground staining identified on the property during a Phase I Environmental Property Assessment conducted in August, 1995. Subsequently, these areas of surficial staining were characterized through a Phase II investigation conducted on August 24, 1995 (see attached Phase II sampling and testing results). This correspondence is intended to bring you up to date on the project's limited Remedial Action results and to provide a basis for additional communications between the Wisconsin Department of Natural Resources (DNR); the property owners, Norman and Donna Camenker; and TPT.

REMEDIAL ACTION RESULTS

Prior to the Remedial Action field work, one soil sample (SS1) was collected by TPT from the Spill Site - 1 location (the most contaminated area of surficial staining) on September 12, 1995, and analyzed for leachable lead using the toxicity characteristics leaching procedure (TCLP). Results of the analysis indicated no detectable leachable lead content in the soil sample.

The project's limited Remedial Action field work commenced on September 26, 1995, and involved the excavation and removal of petroleum contaminated soil from the Hughitt Slip property. Each area of surface staining identified during the Phase II investigation was over-excavated using a backhoe operated by Earth Burners, Inc. (Figure 3). Each area

Preliminary Results - Remedial Action/TPT #561-95E. RA
Hughitt Slip Property/Superior, WI

Page 1 of 3

of excavation extended to a depth of 1½ to 2 feet below surface grade. Groundwater was not encountered in any of the excavations. The excavations were directed by a TPT environmental technician, with soil vapor and laboratory soil samples collected following each excavation. Five soil vapor samples were collected from the base and the four walls of each excavation and field screened for petroleum related organic vapors using a portable photoionization detector (PID). One laboratory soil sample was collected from the base of each excavation and analyzed for diesel range organics (DRO), petroleum volatile organic compounds (PVOC) and lead (Pb).

Following the excavations, the soils were removed from the property and transported to the Lakehead Blacktop and Materials plant in Superior for thermal treatment.

SOIL VAPOR AND CHEMICAL ANALYSIS RESULTS

Results of the soil sample field screening indicated low potentials for petroleum contamination remaining at Excavations 2, 3b and 3c, with PID readings ranging from 0.0 to 3.9 parts per million (ppm; Table 1). Moderate organic vapor concentrations ranging from 4.9 to 71.7 ppm were revealed from soil vapor samples collected from Excavation 1, while moderate to elevated PID readings ranging from 11.3 to 155 ppm were revealed from Excavation 3a.

Results of the soil sample laboratory analyses indicated generally low to nondetectable concentrations of DRO from Excavations 1, 2, 3b and 3c ranging from below method detection limits to 11.8 ppm (Table 2), while an elevated DRO concentration of 4240 ppm was revealed in the Excavation 3a base soil sample. PVOC concentrations were only detected in samples SS3Aa and SS3Ab but had method detection limits of 200 parts per billion (ppb) due to the elevated DRO contaminant concentrations.


COMMENTS

It appears that additional investigation and remedial action work may be required on the property prior to a consideration by the DNR for site closure. Due to the very small sizes of the excavations, modifications to the standard DNR regulations governing remedial actions might be considered. In consideration of these aspects, TPT has delayed further investigation and remedial action work at the property pending project discussion with the DNR.

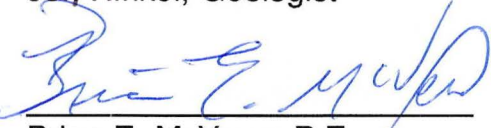
If you have any questions regarding the project, please feel free to call me at (218) 722-1911. I look forward to hearing from you and discussing various options for proceeding to site closure in as expedient and as cost effective a manner as possible.

Sincerely,

Twin Ports Testing, Inc.



Jon Hinkel, Geologist



Brian E. McVean, P.E.
Environmental Department Manager

cc: Norman and Donna Camenker

Attachments:

- Figure 1: Subject Property Location
- Figure 2: Site Map
- Figure 3: Site Map Showing Sampling Location Details
- Table 1: Field Screening Results
- Table 2: Laboratory Analysis Results
- Laboratory Reports
- Phase II Sampling and Testing Results Report

ST LOUIS CO
DOUGLAS CO
ST LOUIS

BAY

West Gate Basin
Cannons Point

East Gate Basin

11

SOUTH

CHANNEL

Howard

SUBJECT PROPERTY

SUPERIOR

Oil Tanks

FRONT

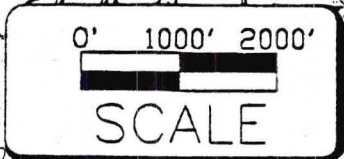
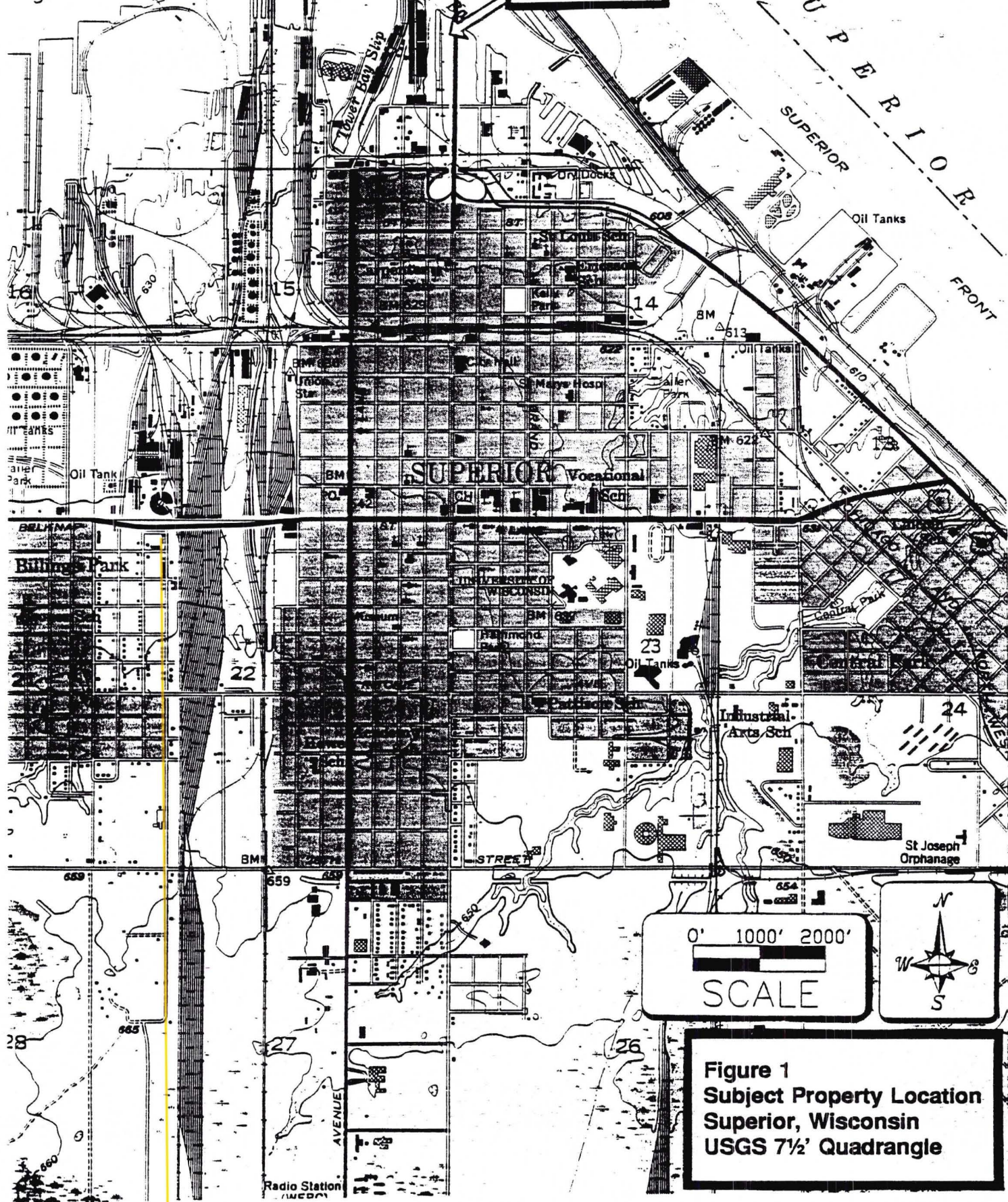
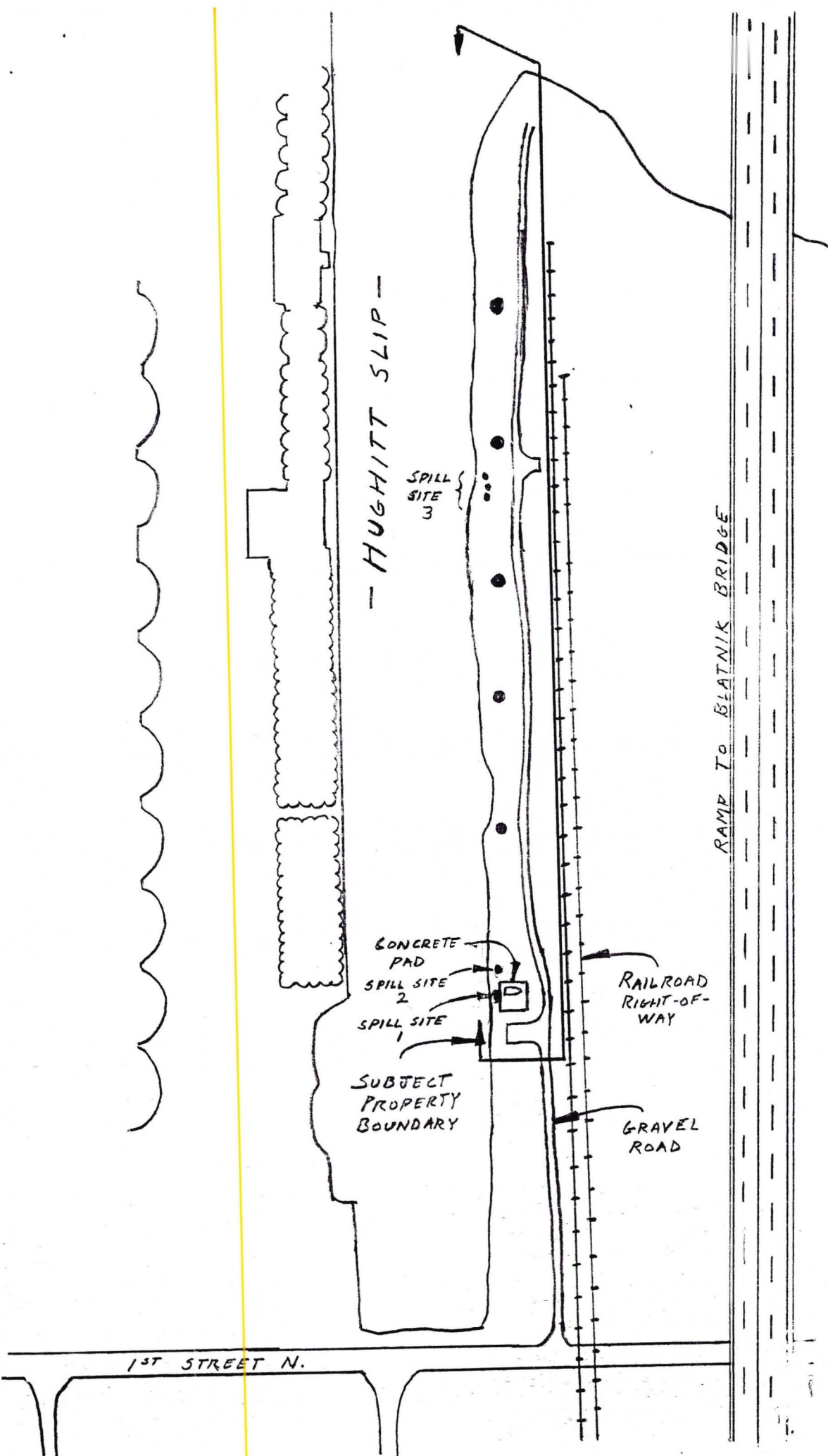


Figure 1
Subject Property Location
Superior, Wisconsin
USGS 7½' Quadrangle



● MORING CLEAT

Figure 2
Site Map
Hughtitt Slip Property
Superior, Wisconsin

HUGHITT SLIP -

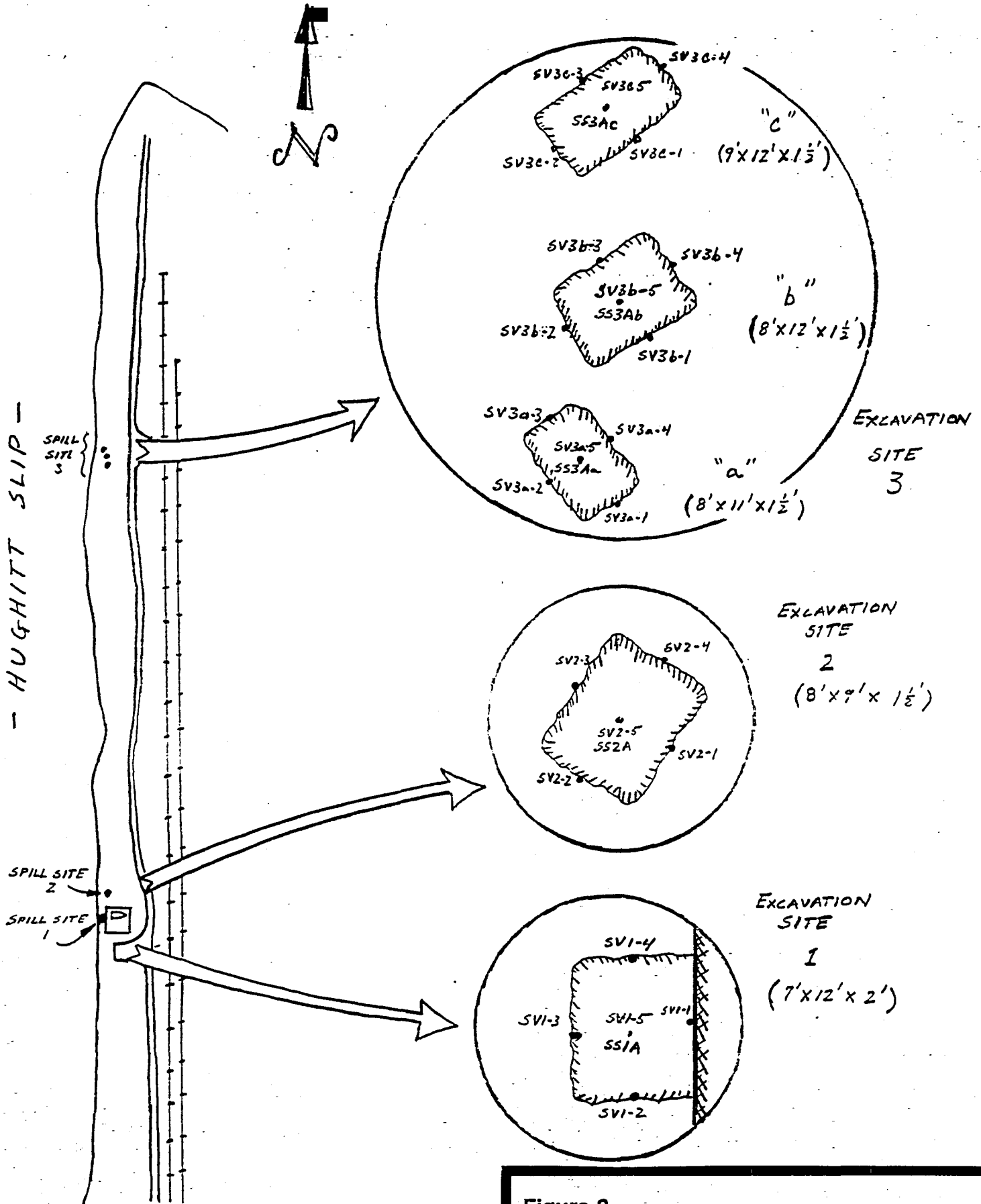


Figure 3
Site Map Showing Sampling Location Details
Hughtitt Slip Property
Superior, Wisconsin

TABLE 1
Field Screening Results
Hughitt Slip Property Excavations
Superior, Wisconsin
September, 1995 561-95E.RA

Location	Sample Number	Organic Vapor Concentration (ppm)
Excavation adjacent to concrete pad. 1	SV1-1	31.5
	SV1-2	67.0
	SV1-3	71.7
	SV1-4	12.8
	SV1-5	4.9
Excavation 36 feet north of concrete pad. 2	SV2-1	0.0
	SV2-2	0.0
	SV2-3	0.0
	SV2-4	0.0
	SV2-5	0.0
Southern excavation near vehicle turnaround. 3a	SV3a-1	11.3
	SV3a-2	96.2
	SV3a-3	127
	SV3a-4	134
	SV3a-5	155
Central excavation near vehicle vehicle turnaround. 3b	SV3b-1	3.3
	SV3b-2	2.7
	SV3b-3	2.4
	SV3b-4	2.1
	SV3b-5	3.9
Northern excavating near vehicle turnaround 3c	SV3c-1	3.3
	SV3c-2	1.8
	SV3c-3	1.8
	SV3c-4	1.5
	SV3c-5	1.5

Note: * Organic vapor concentrations provided in parts per million (ppm)
 * All soil vapor samples were collected at the excavation bases, 1½ to 2½ feet below the surface.

TABLE 2
Laboratory Analysis Results
Hughitt Slip Property Excavations
Superior, Wisconsin
September, 1995 561-95E.RA

Location	Soil Sample Number	Parameter, concentration (ppm)									
		DRO	Benzene	Toluene	Ethylbenzene	Xylenes	1,3,5-TMB	1,2,4-TMB	MTBE	Lead	Lead (TCLP)
Excavation adjacent to concrete pad 1	SS1	--	--	--	--	--	--	--	--	--	<
	SS1A	5.10	<	<	<	<	<	<	<	<	--
Excavation 36 ft. north of concrete pad 2	SS2A	<	<	<	<	<	<	<	<	<	--
Southern Excavation near vehicle turnaround 3a	SS3Aa	4240	<	0.765	0.238	2.51	1.31	8.41	<	254	--
Central Excavation near vehicle turnaround 3b	SS3Ab	11.8	<	0.219	<	<	<	<	<	257	--
Northern Excavation near vehicle turnaround 3c	SS3Ac	8.26	<	<	<	<	<	<	<	160	--
Wisconsin DNR Interim Soil Cleanup Guideline/Maximum Allowable Leachable Metal Concentration		100	0.0055	1.5	2.9	4.1	--	--	--	--	5

DRO - diesel range organics
TMB - trimethylbenzene
MTBE - methyl tertiary butyl ether
-- - analysis not conducted/guideline not established

TCLP - toxicity characteristics leaching procedure (of laboratory analysis)
ppm - parts per million, equivalent to milligrams per kilogram or mg/kg
< - concentration below laboratory method detection limits



728 GARFIELD AVENUE ■ DULUTH, MINNESOTA 55802
MN (218) 722-1911 ■ FAX (218) 722-3295

A DIVISION OF TWIN PORTS TESTING, INC.

LAKE SUPERIOR LABORATORIES

Date: 10/11/95

Client: Twin Ports Testing
Environmental Dept.
728 Garfield Avenue
Duluth, MN 55802

Attn: Jon Hinkel

Phone: (218) 722-1911

Fax: (218) 722-3295

Chain of Custody #: 13367

Project: Hughitt Slip Property

Project ID: 561-95E.RA

LAB ID #	SAMPLE ID
4392-95LS	SS1A
4393-95LS	SS2A
4394-95LS	SS3Aa
4395-95LS	SS3Ab
4396-95LS	SS3Ac

Signature

Linda Thiry, Director
Tim Buck, Lab Manager

Wis. Certification Number: 816057440

Minn. Certification Number: 027-137-307

This cover page is the first of _____ pages

Quality Assurance / Quality Control Report

Client: Twin Ports Testing

Chain Of Custody #: 13367

Project: Hughitt Slip Property

Project ID: 561-95E.RA

QC Parameter	Blank	Soil Blank	Duplicate	Spike	Spike Duplicate	Soil Spike	Soil Spike Duplicate
DRO	NA	Pass	NA	NA	NA	Pass	Pass
BTEX/PVOC	NA	Pass	NA	NA	NA	Pass	Pass
INORGANICS	Pass	NA	NA	Pass	NA	NA	NA

Remarks

Client
 Twin Ports Testing
 Environmental Dept.
 728 Garfield Avenue
 Duluth, MN 55802

Project: Hughitt Slip Property
Project ID: 561-95E.RA

Collected By: R.J. Hinkel
Delivered By: R.J. Hinkel

Chem. Lab ID	4392-95LS	4393-95LS	4394-95LS
Sample Type	Soil	Soil	Soil
Collected	09/26/95	09/26/95	09/26/95
Received	09/28/95	09/28/95	09/28/95
Reported	10/11/95	10/11/95	10/11/95
Sample Description	SS1A	SS2A	SS3Aa

Analysis	Date Analyzed	MDL	4392-95LS	4393-95LS	4394-95LS
MTBE	10/04/95	0.200 mg/kg	ND α	ND	ND
Benzene	10/04/95	0.200 mg/kg	ND α	ND	ND
Toluene	10/04/95	0.200 mg/kg	ND α	ND	0.765 mg/kg
Ethylbenzene	10/04/95	0.200 mg/kg	ND α	ND	0.238 mg/kg
Total Xylenes	10/04/95	0.200 mg/kg	ND α	ND	2.51 mg/kg
1,3,5 Trimethylbenzene	10/04/95	0.200 mg/kg	ND α	ND	1.31 mg/kg
1,2,4 Trimethylbenzene	10/04/95	0.200 mg/kg	ND α	ND	8.41 mg/kg
Lead	10/11/95	10.0 mg/kg	ND	ND	254 mg/kg
Moisture	10/04/95	1.00 %	17.8 %	19.0 %	24.4 %
Diesel Range Organics	09/29/95	5.00 mg/kg	5.10 mg/kg	ND	4240 mg/kg α

Remarks

MDL \Rightarrow Method Detection Limit
 ND \Rightarrow Not Detected at or above MDL

α \Rightarrow Analyzed On 10/03/95

Client
 Twin Ports Testing
 Environmental Dept.
 728 Garfield Avenue
 Duluth, MN 55802

Project: Hughitt Slip Property
Project ID: 561-95E.RA

Collected By: R.J. Hinkel
Delivered By: R.J. Hinkel

Chem. Lab ID	4395-95LS	4396-95LS	
Sample Type	Soil	Soil	
Collected	09/26/95	09/26/95	
Received	09/28/95	09/28/95	
Reported	10/11/95	10/11/95	
Sample Description	SS3Ab	SS3Ac	

Analysis	Date Analyzed	MDL			
MTBE	10/04/95	0.200 mg/kg	ND	ND	
Benzene	10/04/95	0.200 mg/kg	ND	ND	
Toluene	10/04/95	0.200 mg/kg	0.219 mg/kg	ND	
Ethylbenzene	10/04/95	0.200 mg/kg	ND	ND	
Total Xylenes	10/04/95	0.200 mg/kg	ND	ND	
1,3,5 Trimethylbenzene	10/04/95	0.200 mg/kg	ND	ND	
1,2,4 Trimethylbenzene	10/04/95	0.200 mg/kg	ND	ND	
Lead	10/11/95	10.0 mg/kg	257 mg/kg	160 mg/kg	
Moisture	10/04/95	1.00 %	28.2 %	27.3 %	
Diesel Range Organics	09/29/95	5.00 mg/kg	11.8 mg/kg α	8.26 mg/kg	

Remarks

MDL \Rightarrow Method Detection Limit
 ND \Rightarrow Not Detected at or above MDL

α \Rightarrow Analyzed On 10/03/95

LAKE SUPERIOR LABORATORIES



728 GARFIELD AVENUE • DULUTH, MINNESOTA 55802
 MN (218) 722-1911 • FAX (218) 722-3295

A DIVISION OF TWIN PORTS TESTING, INC.
 TPT #

SERIAL NUMBER
 No 13367

LABORATORY REQUEST AND CHAIN OF CUSTODY RECORD

Project Name Hughitt Slip Property No. _____ P.O.# _____
Norman & Deana
 Client Camenker Report To Jon Hinkel
 Address _____
 _____ Bill To 561-95E-RA
 Phone _____ Fax _____

Remarks

Sampler Signature R. J. Hinkel
 Sampler (Print) R. J. Hinkel

Sample No./Location	Date	Time	Matrix			Number of Containers	Preservative	Analyses										LSL No.					
			Air	Liquid	Solid			DRO	PVCC	Pb													
SS1A	9/26/95	3:50 pm			✓	3		✓	✓	✓												4392	
SS2A	9/26/95	4:20 pm			✓	3		✓	✓	✓													4393
SS3Aa	9/26/95	5:00 pm			✓	3		✓	✓	✓													4394
SS3Ab	9/26/95	5:10 pm			✓	3		✓	✓	✓													4395
SS3Ac	9/26/95	5:20 pm			✓	3		✓	✓	✓													4396
Relinquished By	Date/Time	Received By	Relinquished By										Date/Time	Received By									
<u>R. J. Hinkel</u>	<u>9/28/95 4:05 pm</u>	<u>7-28-95</u>																					
Relinquished By	Date/Time	Received By	Relinquished By										Date/Time	Received By									

Turnaround Time: 2 Week 2-5 Day _____ or 24 Hour Rush _____ (additional charge)

LAKE SUPERIOR LABORATORIES

SAMPLE CONDITION UPON RECEIPT CHECKLIST

Project: Hughitt Slip Property

Client: YPT

Date Received: 9-28-95

COC #: 13367

Samples Received By: CLV

Carahan J. Kuzge
(Signature)

- | | Yes | No |
|--|-------------|-------------|
| 1. Is there a chain of custody (COC) or letter stating information contained on a COC? | <u>✓</u> | <u> </u> |
| 2. Is the date and time relinquished in agreement with that written on the letter or COC? | <u>✓</u> | <u> </u> |
| 3. Do the samples received agree with the COC or accompanying paperwork (i.e. number of samples, matrices, sample tags, sample containers, analyses, etc.)? | <u>✓</u> | <u> </u> |
| 4. Are all the samples within the holding times for requested analyses? Communicate any lapse of greater than 4 days beyond date of collection for VOA analysis. | <u>✓</u> | <u> </u> |
| 5. Are all the sample containers intact (i.e., not broken, leaking, etc.)? | <u>✓</u> | <u> </u> |
| 6. Did the samples arrive on ice? | <u>✓</u> | <u> </u> |
| a) What temperature did the samples arrive at? | <u> </u> | <u> </u> |
| b) Are the samples at the proper temperature? | <u>✓</u> | <u> </u> |
| 7. Is there enough sample to do all the analyses? | <u>✓</u> | <u> </u> |
| 8. Are the samples preserved correctly? | <u>✓</u> | <u> </u> |
| 9. Are the VOA vials head-space free? | <u>NA</u> | <u> </u> |

'NO' Items Explained:



728 GARFIELD AVENUE ■ DULUTH, MINNESOTA 55802
MN (218) 722-1911 ■ FAX (218) 722-3295

A DIVISION OF TWIN PORTS TESTING, INC.

LAKE SUPERIOR LABORATORIES

Date: 09/18/95

Client: Twin Ports Testing
Environmental Dept.
728 Garfield Avenue
Duluth, MN 55802

Attn: Jon Hinkel

Phone: (218) 722-1911

Fax: (218) 722-3295

Chain of Custody #: 13282

Project: Hughitt Slip

Project ID: 561-95E.RA

LAB ID #	SAMPLE ID
4173-95LS	SS1

Signature _____

Timothy A. Buck

Linda Thiry, Director
Tim Buck, Lab Manager

Wis. Certification Number: 816057440

Minn. Certification Number: 027-137-307

This cover page is the first of _____ pages

Quality Assurance / Quality Control Report

Client: Twin Ports Testing

Chain Of Custody #: 13282

Project: Hughitt Slip

Project ID: 561-95E.RA

QC Parameter	Blank	Soil Blank	Duplicate	Spike	Spike Duplicate	Soil Spike	Soil Spike Duplicate
INORGANICS	Pass	NA	Pass	Pass	NA	NA	NA

Remarks

Client

Twin Ports Testing
 Environmental Dept.
 728 Garfield Avenue
 Duluth, MN 55802

Project: Hughitt Slip
Project ID: 561-95E.RA

Collected By: R.J. Hinkel
Delivered By: R.J. Hinkel

Chem. Lab ID	4173-95LS		
Sample Type	Soil		
Collected	09/12/95		
Received	09/12/95		
Reported	09/18/95		
Sample Description	SS1		

Analysis	Date Analyzed	MDL			
TCLP Lead	09/18/95	0.250 mg/l	ND		

Remarks

MDL ⇒ Method Detection Limit
 ND ⇒ Not Detected at or above MDL

LAKE SUPERIOR LABORATORIES

SAMPLE CONDITION UPON RECEIPT CHECKLIST

Project: Hugh # Slip

Client: TPT-E

Date Received: 9/12/95

COC #: 13282

Samples Received By: 4
Hanson
 (Signature)

- | | Yes | No |
|--|-----------|-------------|
| 1. Is there a chain of custody (COC) or letter stating information contained on a COC? | <u>X</u> | <u> </u> |
| 2. Is the date and time relinquished in agreement with that written on the letter or COC? | <u>X</u> | <u> </u> |
| 3. Do the samples received agree with the COC or accompanying paperwork (i.e. number of samples, matrices, sample tags, sample containers, analyses, etc.)? | <u>X</u> | <u> </u> |
| 4. Are all the samples within the holding times for requested analyses? Communicate any lapse of greater than 4 days beyond date of collection for VOA analysis. | <u>X</u> | <u> </u> |
| 5. Are all the sample containers intact (i.e., not broken, leaking, etc.)? | <u>X</u> | <u> </u> |
| 6. Did the samples arrive on ice? | | <u>NA</u> |
| a) What temperature did the samples arrive at? | <u>NA</u> | |
| b) Are the samples at the proper temperature? | | <u>NA</u> |
| 7. Is there enough sample to do all the analyses? | <u>X</u> | <u> </u> |
| 8. Are the samples preserved correctly? | <u>X</u> | <u> </u> |
| 9. Are the VOA vials head-space free? | | <u>NA</u> |

'NO' Items Explained:

02-116-000170
Kimmes
closed

**APPLICATION TO TREAT OR DISPOSE OF PETROLEUM CONTAMINATED SOIL
ASPHALT PLANT OR OTHER TYPE OF THERMAL TREATMENT UNIT**

Form 4400-149

This form is required by the Department of Natural Resources for leaking underground storage tank sites to ensure that petroleum contaminated soil is treated or disposed of in compliance with NR 500-540, NR 158, and NR 419, Wis. Adm. Code. Failure to comply with applicable statutes and administrative rules may lead to violations of subchapters III and IV of ch. 144 Wis. Stats. and may result in forfeitures of not less than \$10 or more than \$25,000 for each violation, pursuant to ss. 144.426(1), 144.74 (1), and 144.99, Wis. Stats., or fines of not less than \$100 or more than \$150,000 or imprisonment for not more than 10 years, or both, pursuant to s. 144.74 (2), Wis. Stats. Each day of a continuing violation constitutes a separate violation. Department approval of this form is required prior to site remediation, except for soils to be buried in landfills.

DIRECTIONS: 1) Complete parts I and II. 2) Submit the application to the DNR project manager for approval. 3) Have the treatment facility complete part III of the approved form after the soil has been treated. 4) Return the ORIGINAL form to the DNR project manager. 5) Keep a copy for your files.

ALL SITES MUST COMPLETE PART I

Part I. Source of Soil

Site/Facility Name Hughitt Slip Property Site ID. # (for DNR use only) _____
Site Address (no street address; see attached map) Contact Name Norman & Donna Camenker
City, State, Zip Code Superior, Wisconsin 54880 1/4, 1/4, Section, Township, and Range NE 1/4, SE 1/4 Sec. 10, T49N, R14W

The information on this form is accurate to the best of my knowledge.

Signature of Soil Generator Donna Camenker Telephone Number (include area code) (715) 392-5457

Consulting Firm Twin Ports Testing, Inc. Contact Jon Hinkel Telephone Number (218) 722-1911

Estimated Volume Contaminated Soil 18 Tons cubic yards (circle one) Soil Type (USCS)
sand (SP, SW)
 silty/clayey sands (SM, SC)
silt (ML, MH, OL)
clay (Cl, CH, OH)
 gravel (GC, GM, GP, GW)
peat (PT) } fill material, mixture of soils

Type of Petroleum Contamination (Circle):

Gasoline Diesel Fuel/#2 Fuel Oil

Other Waste Oil

Distance to Nearest Residence/Business 800 ft.

Contaminant concentration:

One screened sample for each 15 yds³ and one laboratory analysis for each 300 yds³ of contaminated soil when the field instrument registers contamination OR one laboratory analysis for each 100 yds³ when the field instrument does not register contamination on soil shown to be contaminated during the site investigation/excavation or stockpiling. PLEASE ATTACH A TABLE LISTING RESULTS OF BOTH FIELD SCREENING AND LAB ANALYSES, AND INCLUDE SUPPORTING LAB REPORTS, IN ADDITION TO THE TPH AND BENZENE INFORMATION REQUESTED BELOW. NOTE: DILHR requires a minimum of 3 laboratory samples on excavated soil for PECFA claims.

Total Benzene in soil to be remediated (attach calculations) < 0.010 lbs

Total Petroleum Hydrocarbons (TPH) in soil to be remediated (attach calculations) 519 lbs

Total TPH as diesel range organics

ATTACH EMISSIONS CALCULATIONS

(a/1,000,000) x (2,800 lbs/yd³) x b = benzene emission in lbs., where a = benzene concentration of soil sample in ppm or mg/kg dry weight basis, and b = amount of contaminated soil in yds³. NOTE: This calculation can also be used to estimate TPH emissions by substituting TPH concentration (ppm or mg/kg) for "a". It may also be used to calculate VOCs.

Part II: Proposed Treatment Facility

Name of Plant Lakehead Blacktop & Mtls. Plant number and Model Madson 4000 lb. ^{Batch} plant
Contact Mr. Joe Kimmes DNR Facility ID. No. 816037640
Address 6327 Tower Ave. Distance to Nearest Residence/Business 5000 ft.
(or location of portable plant) Superior, WI 54880

LEAVE BLANK - DEPARTMENT OF NATURAL RESOURCES USE ONLY

Application Concurrence:

Air Management Phyllis Holmbeck Date 9/22/95
Project Manager _____ Date _____

Comments:

THIS SECTION TO BE COMPLETED BY THE ASPHALT/THERMAL UNIT PROCESSING THE CONTAMINATED SOIL AFTER PROCESSING IS COMPLETED

Part III

WDNR Air Pollution Control Permit Number _____ Actual Volume of Soil Treated (tons cubic yards) 16 yds
Date of transport to plant September 26, 1995 Date of treatment November 8, 1995
Transporter Name Earth Movers of Duluth Transporter License Number N/A
Circle One: Roasted and Incorporated Roasted Only
Total Benzene emissions in pounds for this batch (apply 99.90 Factor w/afterburner 50% destruction factor if no after burner is used) 0.0001 lbs
Benzene emissions to date for this plant (including this batch) for this calendar year 2.4289 lbs
Signature of Treatment plant representative _____ Telephone Number at Plant 715-392-1989

POST BURN SAMPLE RESULTS: COMPLETE ONLY FOR SOILS NOT INCORPORATED!

(One representative sample for each 100 cubic yards-not composites)

Sample Number _____
TPH _____

DNR APPROVAL IS REQUIRED BEFORE USING AS COMMON FILL

Date of backfilling or use as common fill _____ Location of fill site 1/4 1/4 S T R

TOTAL BENZENE CALCULATION:

$$\left(\frac{< 0.2 \text{ mg/kg}}{1,000,000} \right) \times \left(\frac{2,800 \text{ lbs.}}{1 \text{ cu yrd}} \right) \times (18 \text{ cu yrds}) = < 0.010 \text{ lbs. benzene}$$

Det. level

$$\frac{0.2}{1,000,000} \times 2800 \times 18 \text{ yds} = 0.0090 \text{ lbs}$$

99% Factor w/afterburner = 0.0001 lbs

TOTAL PETROLEUM HYDROCARBONS CALCULATION:

$$\left(\frac{10,300 \text{ mg/kg}}{1,000,000} \right) \times \left(\frac{2,800 \text{ lbs.}}{1 \text{ cu yrd}} \right) \times (18 \text{ cu yrds}) = 519 \text{ lbs. TPH}$$

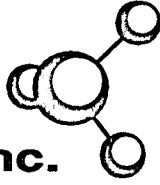
Feed rate Calc.

98% dist.

$$\begin{aligned} \text{X tons/hr} &= \frac{(9 \text{ lb/hr}) \times (1.4 \text{ ton/yd}^3) \times 18 \text{ yd}^3}{519 \text{ lb DRO} \times (1 - 0.98)} \\ &= 21.85 \text{ yd}^3/\text{hr.} \end{aligned}$$

TWIN PORTS TESTING, inc.

SINCE 1972



RECEIVED
SEP 14 1995

TRANSMITTAL

DNR SUPERIOR

1301 NORTH THIRD STREET • SUPERIOR, WISCONSIN 54880
FAX # (715) 392-7163 • (715) 392-7114

To: Steve La Valley
Wisconsin DNR
1705 Tower Avenue
Superior, WI 54880

Date: Sep. 12, 1995
Job #: 552-95E. MM
Client: Mrs. Donna Camenker
Project: Hughitt Slip Property

We are sending you: Enclosed Airmail Shop Drawings
 Separate Cover 1st Class Other Drawings
 By our Messenger Other Specifications
 By your Messenger Other

# OF COPIES	REPORT/PROPOSAL ID	LATEST DATE	DESCRIPTION OR REMARKS
①	Phase II	report	

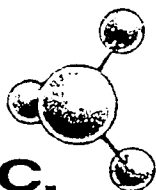
THESE ARE TRANSMITTED as checked below:
For approval As requested No Exception Taken Revise & resubmit
For your use For review & comment Make corrections noted Submit specified item

Remarks: Dear Steve,
We are proceeding with the cleanup of the Hughitt
Slip property as authorized by our client. Our work
plan is following the suggestions indicated in the
Remarks section of the enclosed report. If
you have any questions or comments, please feel
free to contact me any time.

COPIES TO: _____ Encl. _____ Trans. _____
Mrs. Donna Camenker
Sincerely,
Jon Hinkel
(218) 722-1911

TWIN PORTS TESTING INC.

SINCE 1972



1301 NORTH THIRD STREET • SUPERIOR, WISCONSIN 54880
(715) 392-7114 • FAX (715) 392-1116

728 GARFIELD AVENUE • DULUTH, MINNESOTA 55802
(218) 722-1911 • FAX (218) 722-3295

8 INDUSTRIAL PARK ROAD • NEGAUNEE, MICHIGAN 49866
(906) 226-6653 • FAX (906) 226-3699

September 12, 1995
TPT # 552-95E.MM

Mrs. Donna Camenker
70 Highgate Road
Superior, Wisconsin 54880
Phone: (715) 392-5457

Re: Phase II Sampling and Testing Results
Hughitt Slip Property
Superior, Wisconsin

Dear Mrs. Camenker:

Twin Ports Testing, Inc. (TPT) is pleased to provide the following results of the Phase II soil sampling and testing investigation conducted at the Hughitt Slip property (Lots 1-9, Block 3, of the West Superior 8th Division) in Superior, Wisconsin (Figure 1). The Phase II investigation followed from recommendations listed in a Phase I Environmental Property Assessment completed for the property in August, 1995 (TPT # 539-95E.PI) and was conducted according to the Work Plan outlined in TPT Proposal # 95P-115E.

METHODS

Field work of the Phase II investigation was conducted August 24, 1995. Soil samples were collected by TPT environmental technicians from the three areas of ground staining identified on the Hughitt Slip property in the Phase I report (Figure 2). The soil samples were collected at approximately one foot deep each using hand shovels, and screened in the field for petroleum related organic vapors using a portable photoionization detector (PID). As the northern-most area of ground staining exhibited a series of more widely spaced stains, soil samples were collected and screened from three points in the area. Results of the field screening revealed organic vapor concentrations ranging from 0.0 to 51 parts per million (ppm) throughout the sample suite (Table 1).

Laboratory samples were analyzed from each of the three separate areas of ground staining for diesel range organics (DRO); petroleum volatile organic compounds (PVOC); lead, cadmium and chromium (Pb, Cd, Cr); and polychlorinated biphenyls (PCB).

RESULTS

Results of the analyses revealed moderate to high concentrations of diesel range organics (45.1-10,300 ppm); various minor detections of several specific petroleum related compounds; minor to moderate concentrations of chromium (9.05 - 6.51 ppm); and moderate to moderately high concentrations of lead (46.5 - 222 ppm). No cadmium or polychlorinated biphenyl concentrations were detected within the sample suite (Table 2).

REMARKS

In consideration of the elevated concentration of lead indicated in the SS1 soil sample, an additional lead analysis involving toxicity characteristics leaching procedure (TCLP) is recommended for the SS1 sampling area. Should results of the TCLP analysis indicate a leachable lead concentration above 5 ppm, soil from that area will be classified as hazardous waste and must be disposed of accordingly. Assuming the concentration of leachable lead is found to lie below 5 ppm, soil from that area may be considered as nonhazardous, and may be disposed of by conventional means, such as thermal treatment.

In consideration of the high concentration of diesel range organics, but low concentrations of petroleum volatile organic compounds in the area of SS1, a potential exists for significant concentrations of polynuclear aromatic hydrocarbons (PAH) to be present at the site also. Testing for PAH concentration at the site following site remediation is recommended as such data will probably be required for site closure by the WDNR.

Presently, it appears that the speediest and most cost effective remediation alternative for the three spill sites on the Hughitt Slip property may be over-excavation of the contaminated soil, and disposal by thermal treatment at a local plant. This alternative may be applied to all three sites as long as none of the site's soils are classified as hazardous (to be determined pending a TCLP analysis of the SS1 area soil). Following the excavations of the three areas, confirmation soil samples should be collected from the excavation boundaries and analyzed for diesel range organics and petroleum volatile organic hydrocarbons, with polynuclear aromatic hydrocarbon testing included among the analyses for the SS1 site. The excavations would then be backfilled using "clean" soil. Should the project progress as suggested above, with no soil contamination remaining at the sites and no evidence of groundwater contamination encountered, the three sites would be eligible for Wisconsin Department of Natural Resources (DNR) closure (no further work required).

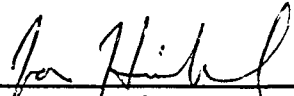
It should be noted however, that project complications could arise which may require additional efforts and resources in order to achieve DNR site closure. Such complications could include a determination of any of the contaminated soils as hazardous, an indication

of groundwater contamination at any of the sites, or the finding of evidence of additional contamination beyond that associated with the identified spill sites.

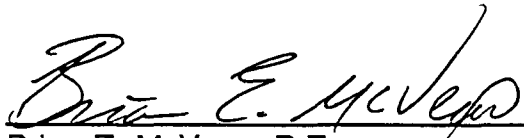
If you have any questions regarding the findings of this Phase II investigation, or TPT's recommendations please feel free to contact us at 722-1911.

Sincerely,

Twin Ports Testing, Inc.



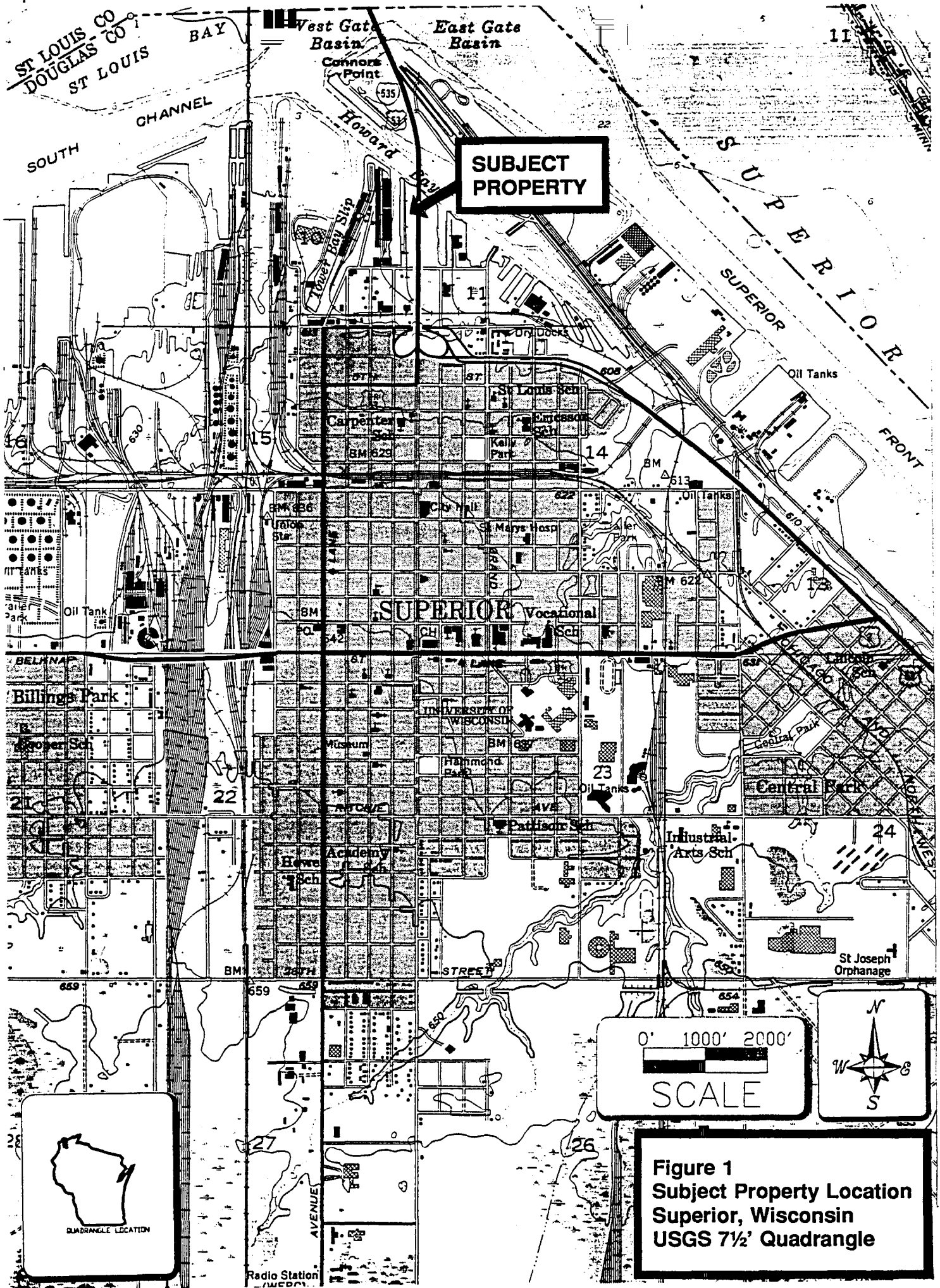
Jon Hinkel, Geologist



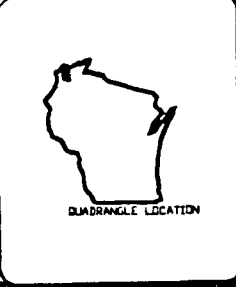
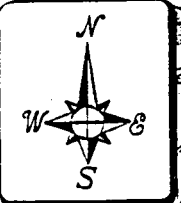
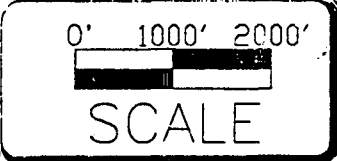
Brian E. McVean, P.E.
Environmental Department Manager

JH:dk

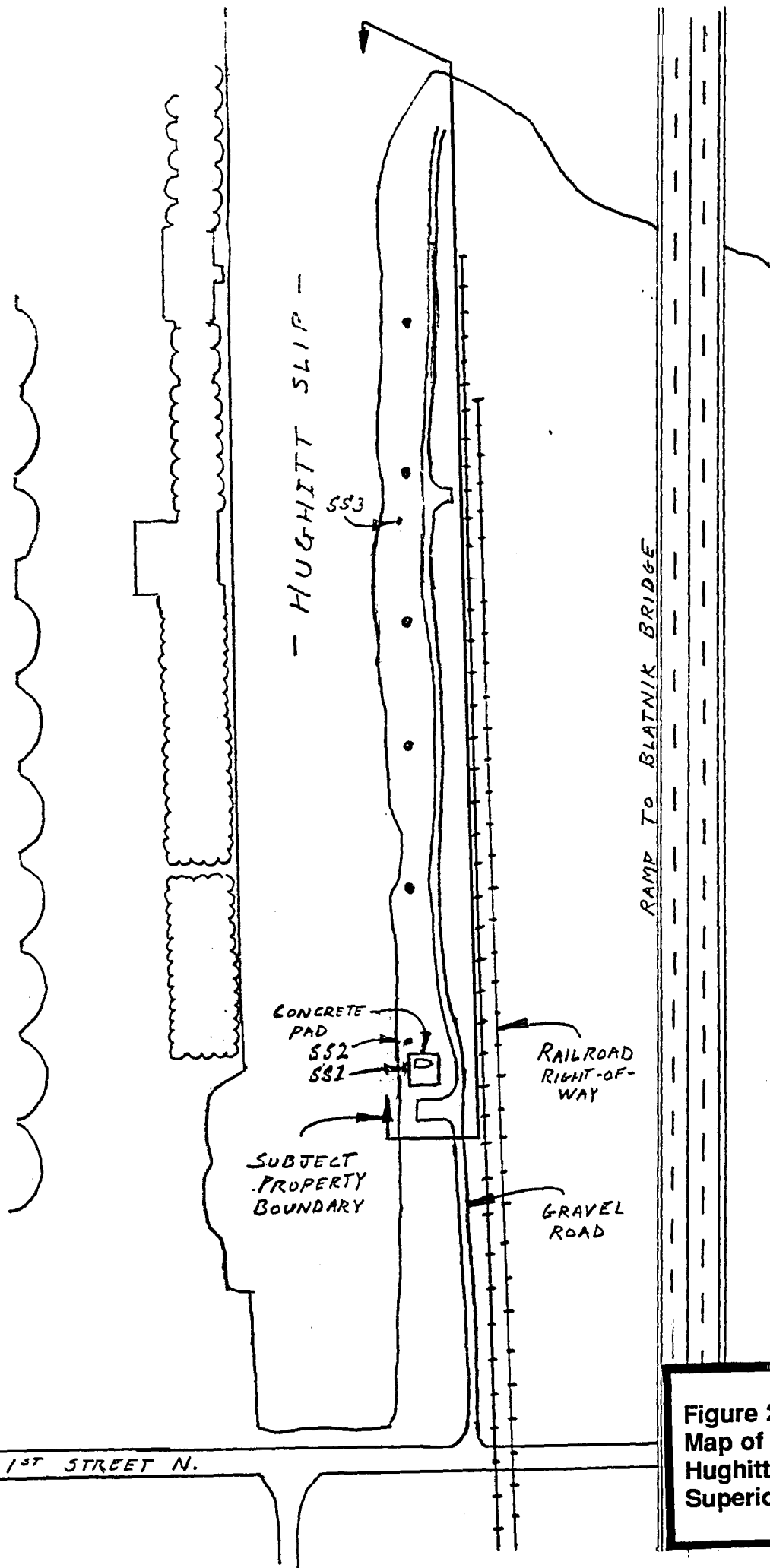
Attachments: Property Location Map
 Sampling Location Map
 Table 1: Field Screening Results
 Table 2: Laboratory Analysis Results
 Laboratory Report



**SUBJECT
PROPERTY**



**Figure 1
Subject Property Location
Superior, Wisconsin
USGS 7½' Quadrangle**



- MORING CLEAT
- SS_ • SOIL SAMPLING LOCATION

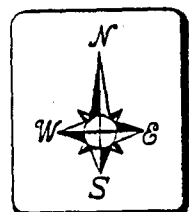


Figure 2
Map of Soil Sampling Locations
Hughitt Slip Property
Superior, Wisconsin

TABLE 1

**Field Screening Results
Phase II Soil Sampling
Hughitt Slip Property
Superior, Wisconsin**

Sampling Location	Field Screening Sampling Number	PID Reading (ppm)
South Site Adjacent to Concrete Pad	SV-1	51
South Site Approx. 36 ft. North of Concrete Pad	SV-2	0.0
North Site Near Vehicle Turnaround	SV-3	5.0
	SV-4	0.0
	SV-5	0.0

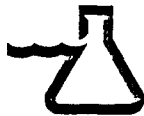
PID = photoionization detector

TABLE 2

**Laboratory Analyses Results
Phase II Soil Sampling
Hught Slip Property
Superior, Wisconsin**

Parameter	Soil Sample Number Sampling Location Concentration in ppm			Wisconsin DNR Interim Soil Cleanup Guideline	Concentration Requiring Additional Analyses (TCLP)
	SS1 south site adjacent to concrete pad	SS2 south site approx. 36 ft. north of concrete pad	SS3 north site near vehicle turnaround		
Diesel Range Organics	10,300	45.1	456	100	--
Toluene	0.372	<	<	1.5	--
Xylenes	1.09	0.373	0.386	4.1	--
1,3,5-trimethylbenzene	0.990	<	<	--	--
1,2,4-trimethylbenzene	0.874	<	0.232	--	--
Lead	222	92.9	46.5	--	100
Chromium	16.1	65.1	9.05	--	100

ppm = parts per million, equivalent to milligrams per kilogram, or mg/kg
 < = concentration below laboratory method detection limits
 -- = guideline not established
 TCLP = toxicity characteristics leaching procedure



728 GARFIELD AVENUE ■ DULUTH, MINNESOTA 55802
MN (218) 722-1911 ■ FAX (218) 722-3295

A DIVISION OF TWIN PORTS TESTING, INC. _____

LAKE SUPERIOR LABORATORIES

Date: 09/07/95

Client: Twin Ports Testing
Environmental Dept.
728 Garfield Avenue
Duluth, MN 55802

Attn: Jon Hinkel

Phone: (218) 722-1911

Fax: (218) 722-3295

Chain of Custody #: 13243

Project: Hughitt Slip

Project ID: 552.95E.MM

LAB ID #	SAMPLE ID
3952-95LS	SS1 (1')
3953-95LS	SS2 (1')
3954-95LS	SS3 (1')

Signature _____

Timothy A. Buck
Linda Thiry, Director
Tim Buck, Lab Manager

Wis. Certification Number: 816057440

Minn. Certification Number: 027-137-307

This cover page is the first of _____ pages

Quality Assurance / Quality Control Report

Client: Twin Ports Testing

Chain Of Custody #: 13243

Project: Hughitt Slip

Project ID: 552.95E.MM

QC Parameter	Blank	Soil Blank	Duplicate	Spike	Spike Duplicate	Soil Spike	Soil Spike Duplicate
DRO	NA	Pass	NA	NA	NA	Pass	Pass
PVOC	NA	Pass	NA	NA	NA	Pass	Pass
PCB'S	Pass	NA	Pass	Pass	NA	NA	NA
INORGANICS	Pass	NA	Fail	Pass	NA	NA	NA

Remarks For Chromium : Duplicate RPD = 41.4%.
For Lead : Duplicate RPD = 56.3%.

Client

Twin Ports Testing
 Environmental Dept.
 728 Garfield Avenue
 Duluth, MN 55802

Project: Hughitt Slip
Project ID: 552.95E.MM

Collected By: Mark Darby / Mark Udd
Delivered By: Mark Darby

Chem. Lab ID	3952-95LS	3953-95LS	3954-95LS
Sample Type	Soil	Soil	Soil
Collected	08/24/95	08/24/95	08/24/95
Received	08/24/95	08/24/95	08/24/95
Reported	09/07/95	09/07/95	09/07/95
Sample Description	SS1 (1')	SS2 (1')	SS3 (1')

Analysis	Date Analyzed	MDL			
MTBE	08/28/95	0.200 mg/kg	ND	ND	ND
Benzene	08/28/95	0.200 mg/kg	ND	ND	ND
Toluene	08/28/95	0.200 mg/kg	0.372 mg/kg	ND	ND
Ethylbenzene	08/28/95	0.200 mg/kg	ND	ND	ND
Total Xylenes	08/28/95	0.200 mg/kg	1.09 mg/kg	0.373 mg/kg	0.386 mg/kg
1,3,5 Trimethylbenzene	08/28/95	0.200 mg/kg	0.990 mg/kg	ND	ND
1,2,4 Trimethylbenzene	08/28/95	0.200 mg/kg	0.874 mg/kg	ND	0.232 mg/kg
Lead	08/31/95	5.00 mg/kg	222 mg/kg	92.9 mg/kg	46.5 mg/kg
Moisture	08/28/95	1.00 %	15.1 %	22.7 %	30.5 %
Cadmium	09/01/95	1.000 mg/kg	ND	ND	ND
Chromium	09/01/95	5.00 mg/kg	16.1 mg/kg	65.1 mg/kg	9.05 mg/kg
Diesel Range Organics	08/25/95	5.00 mg/kg	10300 mg/kg	45.1 mg/kg	456 mg/kg
PCB's, total	08/25/95	0.024 mg/kg	ND	ND	ND

Remarks

MDL ⇒ Method Detection Limit
 ND ⇒ Not Detected at or above MDL

I.D. # 170

District: <u>NWD</u> County: <u>Douglas</u> ⁽¹⁶⁾ Site Name: <u>Hughitt Slip Property</u> Address: _____ Legal Municipality: <u>Superior, City of</u> Date of Discovery: <u>08/29/95</u>	Case No.: _____ PMN: _____ FID: <u>816105400</u> Proj. Mgr: <u>C. Seari</u> Support Person: _____ Legal Desc: <u>SE 1/4 NE 1/4 Sec 10, T 49, R 14 W</u> Lat: N _____ Long: W _____ Date of RP Contact: <u>12/08/95</u>
--	--

PRIORITY SCREENING: <input checked="" type="checkbox"/> 1 = High <input type="checkbox"/> 3 = Low <input type="checkbox"/> 4 = Unknown PRE-SCORE _____	FUNDING SOURCE: <input checked="" type="checkbox"/> 1 = FP <input type="checkbox"/> 2 = LTF <input type="checkbox"/> 3 = EF <input type="checkbox"/> 4 = SF <input type="checkbox"/> 5 = None <input type="checkbox"/> 6 = Other (Describe in Comments) <input type="checkbox"/> 7 = EPA Emergency Resp.	ENFORCEMENT AUTHORITY: <input checked="" type="checkbox"/> 1 = Spill Law s. 144.76, Wis. Stats. <input type="checkbox"/> 2 = Envir Repair Law s. 144.442, Wis. Stats. <input type="checkbox"/> 3 = Hazardous Waste Rules NR 600 Series <input type="checkbox"/> 4 = Solid Waste Rules NR 500 Series <input type="checkbox"/> 5 = CERCLA <input type="checkbox"/> 6 = Abandoned Container s. 144.77, Wis. Stat. <input type="checkbox"/> 7 = Other (Describe in Comments)
---	---	---

PROGRAMS INVOLVED: (L - LEAD S - SUPPORT)

<input type="checkbox"/> Aban Containers	<input type="checkbox"/> NR 500 Solid Waste	<input type="checkbox"/> Water Supply
<input type="checkbox"/> Lust	<input type="checkbox"/> Spills	<input type="checkbox"/> Water Resources Mgt
<input type="checkbox"/> NR 600 Hazardous Waste	<input type="checkbox"/> Superfund	<input checked="" type="checkbox"/> Env. Repair

RESPONSIBLE PARTY:	
Business Name: _____ Owner/Mgr.: <u>Norman & Donna Camenker</u> Address: <u>70 Highgate Court</u> <u>Superior WI 54880</u> Phone: <u>715 / 392-5457</u> Contact Person: <u>Same</u>	Business Name: _____ Owner/Mgr.: _____ Address: _____ Phone: _____ / _____ Contact Person: _____

	KNOWN IMPACTS (X)	POTENTIAL IMPACTS (X)
No Threat	_____	_____
Fire/Explosion threat (1)	_____	_____
Contaminated Private Well (2)	_____	_____
Contaminated Public Well (3)	_____	_____
Groundwater Contamination (4)	_____	_____
Soil Contamination (5)	_____	_____
Direct Contact (1-0)	_____	_____
Contaminated Surface Water (7)	_____	_____
Contaminated Air (8)	_____	_____
Other (6)	_____	_____

CONSULTANT INFORMATION:	
Company: <u>Twin Ports Testing, Inc.</u> Contact Person: <u>Jon Hinkel</u> Address: <u>728 Garfield Ave.</u> <u>Duluth, MN 55802</u> Phone: <u>218 / 722-1911</u> (List additional on separate sheet & attach.)	Company: _____ Contact Person: _____ Address: _____ Phone: _____ / _____

