State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
2984 Shawano Avenue
Green Bay WI 54313-6727

Scott Walker, Governor
Daniel L. Meyer, Secretary
Telephone 608-266-2621
Toll Free 1-888-936-7463
TTY Access via relay - 711

WISCONSIN
DEPT. OF NATURAL RESOURCES

January 10, 2018

Kohler Company
Mr. Dan Tresp
444 Highland Dr
Kohler WI 53044

Subject: New Determination Regarding Investigation of Contamination
No Additional Action Required
Kohler Co – Lead Soil Location
444 Highland Dr, Kohler, WI
WDNR BRRTS # 02-60-578171

Dear Mr. Tresp:

On September 30, 2016, on behalf of Kohler Company, you notified the Wisconsin Department of Natural Resources ("WDNR" or "the Department") that lead contamination had been detected at the site listed above. Based on the information that was initially submitted to the WDNR, you were sent a letter on October 20, 2016, explaining your obligations for restoring the environment at the referenced site under Wis. Stats. § 292.11.

This second letter is being sent to notify you, that based on an evaluation of all the information that is now available to the Department, you are not required to conduct an NR 716 site investigation for the site described above.

Kohler Company completed reconstruction of the parking lot associated with the main plant in 2016 and 2017. During the installation of storm sewers, what appeared to be soil at the time, was sampled and found to fail toxicity characteristic leaching procedure (TCLP) for lead. The results were reported to the Department and a case was created as referenced above. After the initial notification to the Department, additional reconstruction and investigative activities identified that the soil was in fact historic fill (i.e., iron byproducts with pockets of brass machining and die casting byproducts) that was present across the northwestern portion of the parking lot. Laboratory analytical results show that lead and/or any other compound associated with the historic fill have not impacted native material below.

Review of the documentation provided to the Department confirm that subsurface materials consist of historic fill material. As such, the property owner must comply with any conditions required by solid waste rules in ch. NR 500 Wis. Adm. Code rule series as long as any waste materials remain in place. Any future redevelopment of this property must consider the presence of waste materials and will require the issuance of an exemption from the DNR to build on an abandoned landfill prior to the start of any construction. Please refer to the Development at Historic Fill Site or Licensed Landfill guidance for further information at http://dnr.wi.gov/topic/landfills/development.html.

The Bureau for Remediation and Redevelopment Tracking System ("BRRTS") will now show the status of the site described above as a "no action required" site. As part of this action, we assign the site a new identification number in our tracking system. PLEASE NOTE: Using the new BRRTS identification

number, (09-60-578171), you may view the information related to your site at any time (http://dnr.wi.gov/topic/Brownfields/wrrd.html) and use the feedback system to alert us to any errors in the data.

If you want a more detailed written response from the Department regarding the "no action required" status, please be advised that under NR 749, Wis. Adm. Code, a $700.00 fee is required for the general liability clarification letter.

Further correspondence regarding this site should be sent to:

Richard Joslin
Remediation and Redevelopment Program
Wisconsin Department of Natural Resources
625 E County Rd Y STE 700
Oshkosh WI 54901-9731

Thank you for your cooperation.

Sincerely,

Denise D. Danelski

Denise D. Danelski
Environmental Program Associate/Outreach
Remediation & Redevelopment Program

cc: Roger Miller – GEI Consultants, Inc. (email - rmiller@geiconsultants.com)
Ruth O'Donnell, DNR-Waste Management Specialist – ruth.odonnell@wisconsin.gov

Joslin, Richard R - DNR

From: Joslin, Richard R - DNR
Sent: Wednesday, January 10, 2018 1:17 PM
To: 'Miller, Roger'; 'Tresp Dan'
Cc: Killian, Paul
Subject: RE: Kohler Parking Lot Historic Fill

Roger and Dan

Thanks you for your cooperation with regard to this case. Based on review of the material that was submitted (email dated November 3, 2017) to the Wisconsin Department of Natural Resources (Department) it has been determined that the original notification with regard to soil contamination is in fact contamination associated with historic fill identified in the northwestern portion of the parking lot. Laboratory results show that lead and/or any other compound associated with the historic fill have not impacted native material below, thus the Department will rescind the RP letter for this case. A New Determination Regarding Investigation of Contamination letter will be sent to Kohler Company to the attention of Mr. Dan Tresp. Additional information will be provided in that letter including requirements for future redevelopment activities associated with the historic fill identified in the parking lot.

If you have any questions with regard to the information in this email, please feel free to contact me.

Thanks

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Richard R. Joslin
Hydrogeologist / NER Spills Coordinator – Remediation & Redevelopment Bureau
Wisconsin Department of Natural Resources
625 East County Road Y, Suite 700, Oshkosh, WI 54901-9731
Phone: (920) 424-7077
Cell Phone: (920) 360-4291
Richard.Joslin@Wisconsin.gov

dnr.wi.gov

From: Miller, Roger [mailto:rmiller@geiconsultants.com]
Sent: Wednesday, December 6, 2017 10:21 AM
To: Joslin, Richard R - DNR <Richard.Joslin@wisconsin.gov>
Cc: Tresp Dan <DANIEL.TRESP@kohler.com>; Killian, Paul <pkillian@geiconsultants.com>
Subject: RE: Kohler Parking Lot Historic Fill

Rick,

As a follow-up to our discussion earlier today, attached is an aerial photo from this fall showing the completed Kohler Co. parking lot looking southwest. Please share this photograph with Roxanne Chronert and SER Waste Group staff, as appropriate, so they can also see the new cap over the historic fill area within the larger NR 538 beneficial reuse placement area. I also understand that Kohler will be filing the deed restriction as required by the NR 538 approval next week.

Please contact us with any questions and let us know how further discussions go with Roxanne and SER Waste Group staff. Kohler and GEI would be available to join discussions between NER and SER, as appropriate, to answer any questions about the parking lot reconstruction project and data on conditions within and surrounding the historic fill zone.

Thank you,

Roger A. Miller, P.G., C.P.G.
Senior Hydrogeologist
GEI Consultants
Consulting Engineers & Scientists
GEI Consultants, Inc.
3159 Voyager Drive | Green Bay, WI 54311
T: 920.455.8657 | **M:** 920.737.6373
www.geiconsultants.com | vCard | map | LinkedIn | Twitter | Facebook

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From: Miller, Roger
Sent: Friday, November 03, 2017 9:51 AM
To: Joslin, Richard R - DNR (Richard.Joslin@wisconsin.gov) <Richard.Joslin@wisconsin.gov>
Cc: 'Tresp Dan' <DANIEL.TRESP@kohler.com>; Killian, Paul <pkillian@geiconsultants.com>
Subject: Kohler Parking Lot Historic Fill

Rick,

Kohler Co. completed reconstruction of the main plant associate parking lot last month including installation of new storm sewers and canopied walkways. As you are aware, historic fill consisting of cast iron byproducts with pockets of brass machining and die casting byproducts was encountered in the northwestern portion of the parking lot during construction. Historic fill disturbed for the new construction was properly tested and disposed of based on waste classification. Last year, the WDNR approved the beneficial reuse of Kohler Co. industrial byproducts (pottery cull, green sand, slag, resin bonded sand) as confined geotechnical fill under s. NR 538.10(5)(b), Wisconsin Administrative Code, to increase the subgrade elevations in the parking lot. Accordingly, the beneficial reuse material is present around and on top of the majority of the historic fill. The purpose of this email is to provide relevant data on the historic fill for your review prior to our conference call scheduled for next Tuesday (11/7) at 10 AM.

Historic Fill Description

- Historic fill contains iron byproducts with pockets of brass machining and die casting byproducts. Note that although initial information provided to the WDNR suggested the material encountered was soil, after opening up additional storm sewer trenches and test pits it became apparent that the material is a historic fill comprised predominantly of non-soil materials.

- Historic fill is comprised of non-soil materials (in descending proportion): cast iron foundry sand, cast iron foundry slag, cast iron refractory brick, brass machining wastes (brass chips, buffing wheels, buffing lint), cast iron enamel power, and brass diecasting sand.

- Observation of test pits and excavations for storm sewers, a bollard, and structural supports for the covered walkways, and review of geotechnical boring logs and analytical data (see below) were used to define the extent of historic fill shown on the attached Figure 3. The extent of historic fill was further defined based on data from UST excavations for two closed LUST cases also depicted on this figure.

- Historic fill occupies approximately 130,000 square feet and its volume is estimated to range from 30,000 to 45,000 cyd.

- The attached photographic log provides images of the historic fill.

Analytical Data

- As presented on attached Table 1, the total lead concentrations in the historic fill varied from 2.41 to 1,450 mg/kg, with an average of 306 mg/kg. Only one result exceeded the industrial RCL of 800 mg/kg. 77% (10 out of 13 samples) of the results were below the nonindustrial RCL of 400 mg/kg.

- 15 samples collected from native soil below or native soil/fill surrounding the historic fill zone contained lead ranging from 2.05 to 18.3 mg/kg, substantially below the background threshold value (BTV) for lead of 52 mg/kg.

- 23 samples (8 in historic fill and 15 in surrounding native soil/fill) were also analyzed for total copper and zinc, two other metals of potential concern based on the owner's knowledge of the historic fill. As summarized on Table 1, all results for these metals were less than the non-industrial RCL and BTV, except for one historic fill sample that contained copper at a concentration (3,746 mg/kg) slightly above its BTV of 3,130 mg/kg.

- TCLP data summarized on Table 2 was used to classify historic fill for waste disposal. The majority of historic fill disturbed for the parking lot project was generated from storm sewer trenches and 4-foot-deep hydrovac potholes excavated for the installation of structural supports for the covered walkways.

Conclusions

- Historic fill is limited to a zone defined in the northwestern portion of the parking lot through a combination of analytical data and observations of excavations and review of boring logs for evidence of historic fill.

- Historic fill is located near the center of the Kohler Co. industrial property and is comprised of iron byproducts with pockets of brass machining and die casting byproducts.

- Soil testing data does not indicate that lead has migrated out of the historic fill such that surrounding/underlying native soil has been adversely impacted.

- The Kohler Co. property is subject to several deed restrictions/affidavits/continuing obligations, including a deed affidavit (in process) for the recent NR 538 industrial byproduct placement in the parking lot. The net result of these continuing obligations and owner knowledge of subsurface conditions is that any excavation that occurs on the mill property will be reviewed by qualified environmental staff and materials tested as needed for appropriate handling and disposal.

Based on the technical considerations presented above, it may be appropriate to manage the historic fill under the WDNR's Waste and Materials Management Program and for this material to be tracked in a GIS database.

We appreciate your review of this information and look forward to discussing this project with you next Tuesday.

Thank you,

Roger A. Miller, P.G., C.P.G.
Senior Hydrogeologist
GEI Consultants
Consulting Engineers & Scientists

GEI Consultants, Inc.
3159 Voyager Drive | Green Bay, WI 54311
T: 920.455.8657 | **M:** 920.737.6373
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Joslin, Richard R - DNR

From: Miller, Roger <rmiller@geiconsultants.com>
Sent: Wednesday, December 20, 2017 8:04 AM
To: Joslin, Richard R - DNR
Cc: Tresp Dan; Killian, Paul
Subject: Kohler Parking Lot Historic Fill
Attachments: Parking_Lot_Kohler-003.jpg; image2017-12-12-122138.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Rick,

The deed affidavit (see attached) is in the process of being recorded with Sheboygan County as required by the NR 538 approval for the parking lot reconstruction project. The recorded affidavit stamped by the County will be available soon.

Please let us know how your discussions are going with Roxanne and SER Waste Group staff. Kohler and GEI would be available to join any discussions, as appropriate, to answer any questions about the parking lot reconstruction project and data on conditions within and surrounding the historic fill zone.

Thank you,

Roger A. Miller, P.G., C.P.G.
Senior Hydrogeologist
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GEI Consultants, Inc.
3159 Voyager Drive | Green Bay, WI 54311
T: 920.455.8657 | **M:** 920.737.6373
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From: Miller, Roger
Sent: Wednesday, December 06, 2017 10:21 AM
To: Joslin, Richard R - DNR (Richard.Joslin@wisconsin.gov) <Richard.Joslin@wisconsin.gov>
Cc: 'Tresp Dan' <DANIEL.TRESP@kohler.com>; Killian, Paul <pkillian@geiconsultants.com>
Subject: RE: Kohler Parking Lot Historic Fill

Rick,

As a follow-up to our discussion earlier today, attached is an aerial photo from this fall showing the completed Kohler Co. parking lot looking southwest. Please share this photograph with Roxanne Chronert and SER Waste Group staff, as appropriate, so they can also see the new cap over the historic fill area within the larger NR 538 beneficial reuse placement area. I also understand that Kohler will be filing the deed restriction as required by the NR 538 approval next week.

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questions about the parking lot reconstruction project and data on conditions within and surrounding the historic fill zone.

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Roger A. Miller, P.G., C.P.G.
Senior Hydrogeologist
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3159 Voyager Drive | Green Bay, WI 54311
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From: Miller, Roger
Sent: Friday, November 03, 2017 9:51 AM
To: Joslin, Richard R - DNR (Richard.Joslin@wisconsin.gov) <Richard.Joslin@wisconsin.gov>
Cc: 'Tresp Dan' <DANIEL.TRESP@kohler.com>; Killian, Paul <pkillian@geiconsultants.com>
Subject: Kohler Parking Lot Historic Fill

Rick,

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Based on the technical considerations presented above, it may be appropriate to manage the historic fill under the WDNR's Waste and Materials Management Program and for this material to be tracked in a GIS database.

We appreciate your review of this information and look forward to discussing this project with you next Tuesday.

Thank you,

Roger A. Miller, P.G., C.P.G.
Senior Hydrogeologist
GEI Consultants
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3159 Voyager Drive | Green Bay, WI 54311
T: 920.455.8657 | **M:** 920.737.6373

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AFFIDAVIT

State of Wisconsin
Department of Natural Resources
PO Box 7921
Madison, Wisconsin 53707-7921

INDUSTRIAL BYPRODUCT AFFIDAVIT
Form 4400-200 (2/01)

Legal Description
SE 1/4 NW 1/4 S29 T15N R23E & SW 1/4 NW 1/4 S29 T15N R23E

This space reserved for recording data.

RETURN TO:
Wisconsin Department of Natural Resources

State of Wisconsin)
Sheboygan County) ss.
)
)

59141672440
Parcel Identification Number (PIN)

Jeffrey S. Plass, being first duly sworn, on oath deposes and says:

1. That affiant is the Kohler Co. of Kohler, Wisconsin, which is a generator of an industrial byproduct as defined under Section NR 538.03, Wisconsin Administrative Code.

2. That more than 10,000 cubic yards of an industrial byproduct were beneficially used under Chapter NR 538, Wis. Admin. Code, on the above-described property.

3. That information concerning the category, type, and volume of industrial byproduct, and the location where the industrial byproduct was placed, may be obtained by contacting the owner of the property.

4. That the purpose of this affidavit is to provide notification to subsequent purchasers under Section NR 538.22, Wis. Admin. Code, that an industrial byproduct was beneficially used on the above described property.

Signature: Jeffrey S. Plass

Printed or Typed Name: Jeffrey S. Plass

Subscribed and sworn to before me this 12th day of December, 20 17.

Signature: Jane A. Quivers

Notary Public, State of Wisconsin.

My commission expires on April 28, 2021.

This document was drafted by the Wisconsin Department of Natural Resources.

Joslin, Richard R - DNR

From: Joosten, Valerie A - DNR
Sent: Friday, November 17, 2017 4:07 PM
To: Joslin, Richard R - DNR
Subject: RE: Kohler Parking Lot Historic Fill

Categories: WORK - Important

Hi Rick, I consulted with Joe Lourigan and Phil Fauble.
Both Joe and I believe that this would be under RR jurisdiction. If any action would be needed it would need to be done through RR authority. Please note, historic fill site isn't something that is necessarily defined in solid waste code so if we call it that it doesn't necessarily result in any action on the waste side. We can always add a historic fill site into SHWIMS as an unclassified landfill if RR requests it.
Phil provided similar feedback below and added the following: I guess I stand by earlier remarks – this is an RR issue for them to sort out. If RR determines that it is a solid waste historic fill site, then we could treat it as such. Kohler historically used significant amounts of lead in their manufacturing process (ceramic glazes), so characterizing this waste material may not be as simple as it sounds.

If you want to have a call between RR & Waste to talk through the various considerations, we can certainly do that. Just let me know.

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Valerie Joosten, P.E.
Phone: (920) 662-5486
Cell: (920) 366-4158
Valerie.Joosten@wisconsin.gov

From: Burns, Melanie M - DNR
Sent: Friday, November 17, 2017 1:59 PM
To: Joosten, Valerie A - DNR <Valerie.Joosten@wisconsin.gov>
Cc: Joslin, Richard R - DNR <Richard.Joslin@wisconsin.gov>
Subject: FW: Kohler Parking Lot Historic Fill

Valerie, I am sending this to you in the hope you may have some ideas as this is out of my area of expertise.

Summary per Ruth: I think the long and the short of it is – during a parking lot reconstruction project at Kohler they came upon historic fill that flunked TCLP for lead. Kohler is requesting that the site NOT become a R&R site – rather it just be tracked as "historic fill" under Waste. See the areas I've highlighted in yellow.
Some more information:
FID: 460015270 (it's a large property, see Ruth's email)
Nate, Phil and Ruth have already weighed in (see responses below).

Let me know if you have any ideas on how we should proceed as a program. Thank you, Melanie

---

From: Joslin, Richard R - DNR
Sent: Friday, November 17, 2017 12:00 PM
To: ODonnell, Ruth A - DNR <Ruth.ODonnell@wisconsin.gov>; Burns, Melanie M - DNR <Melanie.Burns@wisconsin.gov>
Subject: RE: Kohler Parking Lot Historic Fill

Thanks Ruth so much for your help with this.

Melanie when would you be able to discuss this with me? Let me know what works and we can go from there.

Rick

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Richard R. Joslin
Hydrogeologist / NER Spills Coordinator – Remediation & Redevelopment Bureau
Wisconsin Department of Natural Resources
625 East County Road Y, Suite 700, Oshkosh, WI 54901-9731
Phone: (920) 424-7077
Cell Phone: (920) 360-4291
Richard.Joslin@Wisconsin.gov

From: ODonnell, Ruth A - DNR
Sent: Monday, November 13, 2017 10:15 AM
To: Joslin, Richard R - DNR; Burns, Melanie M - DNR
Subject: FW: Kohler Parking Lot Historic Fill

Hi Richard,

I'm not familiar with what GEI is asking for so I reached out to Phil Fauble and Nate Coller – see their email responses below.

At this time – I'm bringing in Melanie Burns who is a Solid Waste Management Specialist and covers Sheboygan County. Please contact her as she may have some input for you.

Ruth O

From: Coller, Nathan - DNR
Sent: Wednesday, November 08, 2017 7:34 AM
To: Fauble, Philip N - DNR <Philip.Fauble@wisconsin.gov>; ODonnell, Ruth A - DNR <Ruth.ODonnell@wisconsin.gov>
Subject: RE: Kohler Parking Lot Historic Fill

Ruth - I agree with Phil.

On the GIS side of things, if a site's not entered in SHWIMS –as a landfill activity--then it won't be shown in WMM sites viewer.

Is this activity already in SHIWMS? Or what would it be entered as? Currently, there's no option in SHWIMS to call it "historic fill"
But we could call it an "unclassified landfill" activity which is nothing more than a miscellaneous category.

Also, will there be a waste registry screening worksheet completed for this site ?

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

Nathan Coller
715-635-4048
nathan.coller@wi.gov

From: Fauble, Philip N - DNR
Sent: Tuesday, November 07, 2017 2:51 PM
To: ODonnell, Ruth A - DNR; Coller, Nathan - DNR
Subject: RE: Kohler Parking Lot Historic Fill

Ruth,

This is going to have to be an RR Program call on this one. It's all about consistency – does this situation warrant treating the site as a solid waste disposal area based on the way similar situations have been handled in RR? Does RR have the flexibility to basically rationalize away a TCLP exceedance in an old waste disposal site? These are questions the Waste & Materials Program can't answer. I have no particular objection to characterizing the material as a solid waste, but we cannot make that determination.

I'm not sure what our GIS capabilities are at present, but we could record it as a historic solid waste fill the old fashioned way (with a FID #) and create a file once we know that it falls outside of RR's jurisdiction.

Phil

From: ODonnell, Ruth A - DNR
Sent: Tuesday, November 07, 2017 2:32 PM
To: Coller, Nathan - DNR; Fauble, Philip N - DNR
Subject: FW: Kohler Parking Lot Historic Fill

Hi Phil & Nate,

Need your help –

I received this email from RR in NER. I think the long and the short of it is – during a parking lot reconstruction project at Kohler they came upon historic fill that flunked TCLP for lead. Kohler is requesting that the site NOT become a R&R site – rather it just be tracked as "historic fill" under Waste. See the areas I've highlighted in yellow.

I got this because there was mention of NR 538 industrial byproducts used in the parking lot project. I'm not sure what to do with this info – but I knew that Nate was the mapping guy!

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Ruth O'Donnell, CHMM
Waste Management Specialist, Adv.

Waste & Materials Management Program
Wisconsin Department of Natural Resources
141 N.W. Barstow Street, Rm. 180
Waukesha WI 53188
Phone: (262) 574 - 2157
Ruth.ODonnell@wisconsin.gov

From: Joslin, Richard R - DNR
Sent: Tuesday, November 07, 2017 1:43 PM
To: ODonnell, Ruth A - DNR <Ruth.ODonnell@wisconsin.gov>
Subject: FW: Kohler Parking Lot Historic Fill

As we discussed see below and attachments. Let me know what would work to discuss.

Rick

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Richard R. Joslin
Hydrogeologist / NER Spills Coordinator – Remediation & Redevelopment Bureau
Wisconsin Department of Natural Resources
625 East County Road Y, Suite 700, Oshkosh, WI 54901-9731
Phone: (920) 424-7077
Cell Phone: (920) 360-4291
Richard.Joslin@Wisconsin.gov

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Sent: Friday, November 03, 2017 9:51 AM
To: Joslin, Richard R - DNR
Cc: Tresp Dan; Killian, Paul
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Analytical Data

- As presented on attached Table 1, the total lead concentrations in the historic fill varied from 2.41 to 1,450 mg/kg, with an average of 306 mg/kg. Only one result exceeded the industrial RCL of 800 mg/kg. 77% (10 out of 13 samples) of the results were below the nonindustrial RCL of 400 mg/kg.

- 15 samples collected from native soil below or native soil/fill surrounding the historic fill zone contained lead ranging from 2.05 to 18.3 mg/kg, substantially below the background threshold value (BTV) for lead of 52 mg/kg.

- 23 samples (8 in historic fill and 15 in surrounding native soil/fill) were also analyzed for total copper and zinc, two other metals of potential concern based on the owner's knowledge of the historic fill. As summarized on Table 1, all results for these metals were less than the non-industrial RCL and BTV, except for one historic fill sample that contained copper at a concentration (3,746 mg/kg) slightly above its BTV of 3,130 mg/kg.

- TCLP data summarized on Table 2 was used to classify historic fill for waste disposal. The majority of historic fill disturbed for the parking lot project was generated from storm sewer trenches and 4-foot-deep hydrovac potholes excavated for the installation of structural supports for the covered walkways.

Conclusions

- Historic fill is limited to a zone defined in the northwestern portion of the parking lot through a combination of analytical data and observations of excavations and review of boring logs for evidence of historic fill.

- Historic fill is located near the center of the Kohler Co. industrial property and is comprised of iron byproducts with pockets of brass machining and die casting byproducts.

- Soil testing data does not indicate that lead has migrated out of the historic fill such that surrounding/underlying native soil has been adversely impacted.

- The Kohler Co. property is subject to several deed restrictions/affidavits/continuing obligations, including a deed affidavit (in process) for the recent NR 538 industrial byproduct placement in the parking lot. The net result of these continuing obligations and owner knowledge of subsurface conditions is that any excavation that occurs on the mill property will be reviewed by qualified environmental staff and materials tested as needed for appropriate handling and disposal.

Based on the technical considerations presented above, it may be appropriate to manage the historic fill under the WDNR's Waste and Materials Management Program and for this material to be tracked in a GIS database.

We appreciate your review of this information and look forward to discussing this project with you next Tuesday.

Thank you,

Roger A. Miller, P.G., C.P.G.
Senior Hydrogeologist

GEI Consultants
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Joslin, Richard R - DNR

From: Miller, Roger <rmiller@geiconsultants.com>
Sent: Friday, November 3, 2017 9:51 AM
To: Joslin, Richard R - DNR
Cc: Tresp Dan; Killian, Paul
Subject: Kohler Parking Lot Historic Fill
Attachments: Figures 1-3 and Tables 1-2_Kohler Co Parking Lot.pdf; Photo Log_Kohler Co Parking Lot.pdf; Geotech Logs - Phase 2 and 3 Areas.pdf; 2016 DNR Concurrence Letter NR 538 - Main Associate Parking Lot.pdf

Categories: WORK - Important

Rick,

Kohler Co. completed reconstruction of the main plant associate parking lot last month including installation of new storm sewers and canopied walkways. As you are aware, historic fill consisting of cast iron byproducts with pockets of brass machining and die casting byproducts was encountered in the northwestern portion of the parking lot during construction. Historic fill disturbed for the new construction was properly tested and disposed of based on waste classification. Last year, the WDNR approved the beneficial reuse of Kohler Co. industrial byproducts (pottery cull, green sand, slag, resin bonded sand) as confined geotechnical fill under s. NR 538.10(5)(b), Wisconsin Administrative Code, to increase the subgrade elevations in the parking lot. Accordingly, the beneficial reuse material is present around and on top of the majority of the historic fill. The purpose of this email is to provide relevant data on the historic fill for your review prior to our conference call scheduled for next Tuesday (11/7) at 10 AM.

Historic Fill Description

- Historic fill contains iron byproducts with pockets of brass machining and die casting byproducts. Note that although initial information provided to the WDNR suggested the material encountered was soil, after opening up additional storm sewer trenches and test pits it became apparent that the material is a historic fill comprised predominantly of non-soil materials.

- Historic fill is comprised of non-soil materials (in descending proportion): cast iron foundry sand, cast iron foundry slag, cast iron refractory brick, brass machining wastes (brass chips, buffing wheels, buffing lint), cast iron enamel power, and brass diecasting sand.

- Observation of test pits and excavations for storm sewers, a bollard, and structural supports for the covered walkways, and review of geotechnical boring logs and analytical data (see below) were used to define the extent of historic fill shown on the attached Figure 3. The extent of historic fill was further defined based on data from UST excavations for two closed LUST cases also depicted on this figure.

- Historic fill occupies approximately 130,000 square feet and its volume is estimated to range from 30,000 to 45,000 cyd.

- The attached photographic log provides images of the historic fill.

Analytical Data

- As presented on attached Table 1, the total lead concentrations in the historic fill varied from 2.41 to 1,450 mg/kg, with an average of 306 mg/kg. Only one result exceeded the industrial RCL of 800 mg/kg. 77% (10 out of 13 samples) of the results were below the nonindustrial RCL of 400 mg/kg.

- 15 samples collected from native soil below or native soil/fill surrounding the historic fill zone contained lead ranging from 2.05 to 18.3 mg/kg, substantially below the background threshold value (BTV) for lead of 52 mg/kg.

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- The Kohler Co. property is subject to several deed restrictions/affidavits/continuing obligations, including a deed affidavit (in process) for the recent NR 538 industrial byproduct placement in the parking lot. The net result of these continuing obligations and owner knowledge of subsurface conditions is that any excavation that occurs on the mill property will be reviewed by qualified environmental staff and materials tested as needed for appropriate handling and disposal.

Based on the technical considerations presented above, it may be appropriate to manage the historic fill under the WDNR's Waste and Materials Management Program and for this material to be tracked in a GIS database.

We appreciate your review of this information and look forward to discussing this project with you next Tuesday.

Thank you,

Roger A. Miller, P.G., C.P.G.
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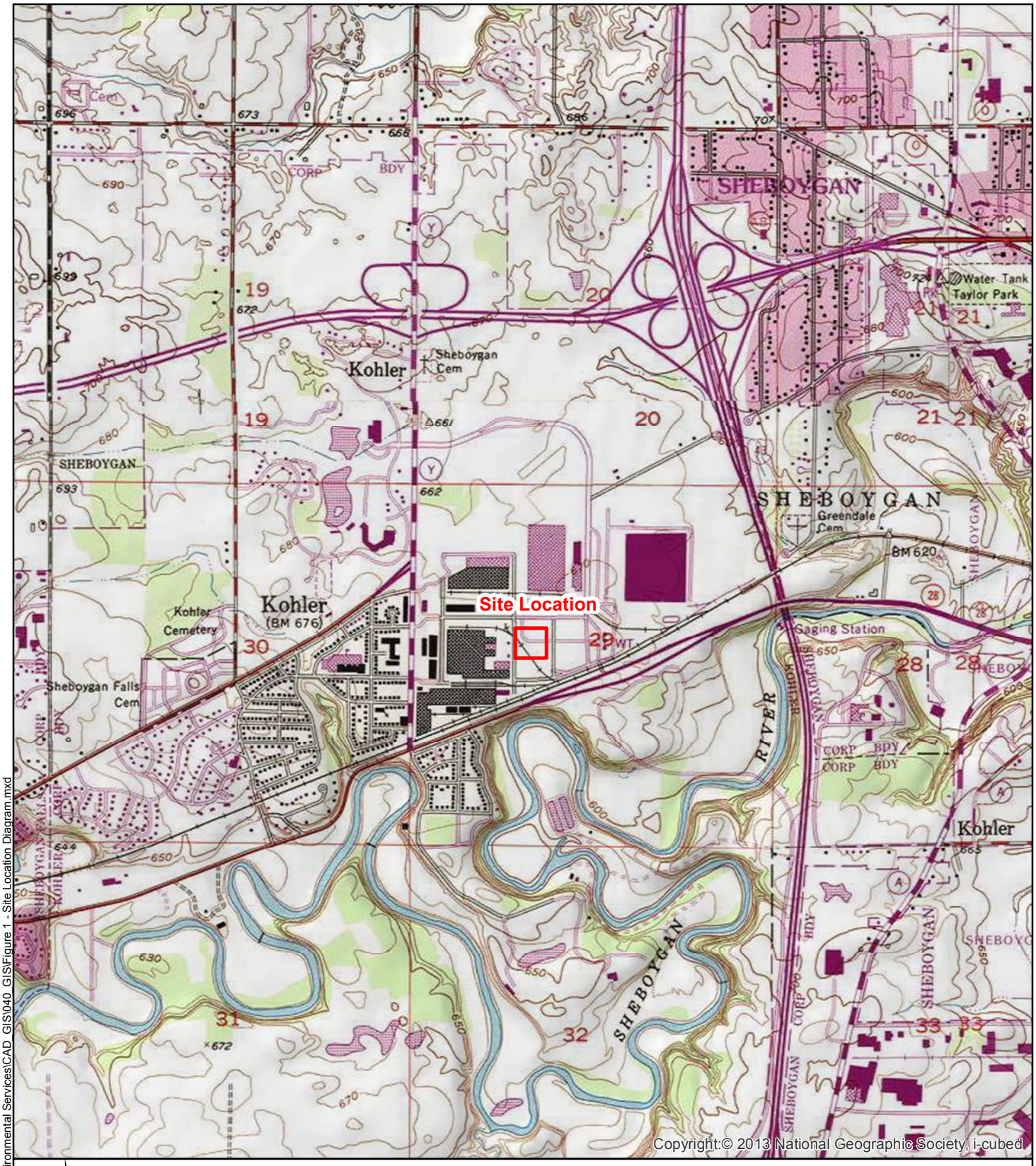


Notes:

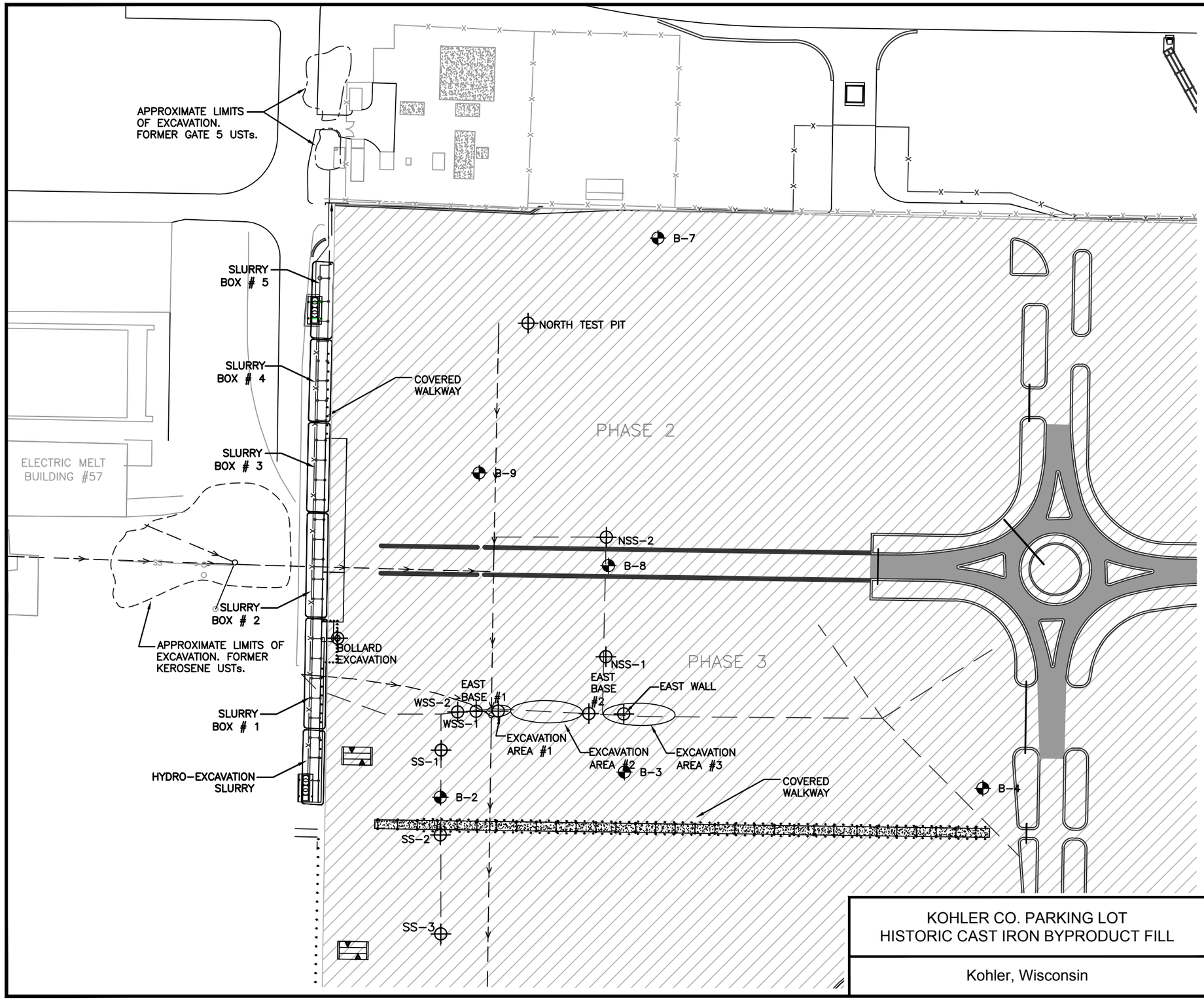
1. BASED ON A 2013 USGS MAP

0 1,000 2,000 4,000 Feet

Scale: 1 inch = 2,000 feet

KOHLER CO. PARKING LOT HISTORIC CAST IRON BYPRODUCT FILL	GEI Consultants	SITE LOCATION DIAGRAM
Kohler, Wisconsin	PROJECT 1703487	OCTOBER 2017 FIGURE 1

K:\Kohler Co\1703487_Parking Lot Environmental Services\CAD_GIS\040_GIS\Figure 1 - Site Location Diagram.mxd



0 100'

1" = 100'

LEGEND

SOIL SAMPLE

STORM SEWER

NR 538 INDUSTRIAL BYPRODUCTS APPROVED FOR USE AS GEOTECHNICAL FILL

B-7 GEOTECHNICAL BORING

DRAFT

KOHLER CO. PARKING LOT
HISTORIC CAST IRON BYPRODUCT FILL

Kohler, Wisconsin

GEI Consultants

SOIL SAMPLE LOCATION DIAGRAM

Project 1703487

OCTOBER 2017 Figure 2

---- K:\Kohler Co\1703487_Parking Lot Environmental Services\In_Progress\Reports\Files From Client\CAD Files\Base Map Fig 2.dwg - 10/31/2017

APPROXIMATE LIMITS OF EXCAVATION. FORMER GATE 5 USTs.

B-7

SLURRY BOX # 5

NORTH TEST PIT

SLURRY BOX # 4

COVERED WALKWAY

PHASE 2

ESTIMATED EXTENT OF HISTORIC CAST IRON BYPRODUCTS WITH POCKETS OF BRASS MACHINING AND DIE CASTING BYPRODUCTS

ELECTRIC MELT BUILDING #57

SLURRY BOX # 3

B-9

NSS-2

B-8

SLURRY BOX # 2

APPROXIMATE LIMITS OF EXCAVATION. FORMER KEROSENE USTs.

BOLLARD EXCAVATION

NSS-1

PHASE 3

EAST BASE #2

EAST WALL

EAST BASE #1

WSS-2

WSS-1

SLURRY BOX # 1

EXCAVATION AREA #1

EXCAVATION AREA #2

EXCAVATION AREA #3

SS-1

B-3

HYDRO-EXCAVATION SLURRY

B-2

COVERED WALKWAY

B-4

SS-2

SS-3

N

0 100'

1" = 100'

LEGEND

- SOIL SAMPLE
- STORM SEWER
- ESTIMATED EXTENT OF HISTORIC FILL
- NR 538 INDUSTRIAL BYPRODUCTS APPROVED FOR USE AS GEOTECHNICAL FILL
- B-7 GEOTECHNICAL BORING

DRAFT

KOHLER CO. PARKING LOT
HISTORIC CAST IRON BYPRODUCT FILL

Kohler, Wisconsin

GEI Consultants

ESTIMATED EXTENT OF HISTORIC CAST IRON BYPRODUCTS WITH POCKETS OF BRASS MACHINING AND DIE CASTING BYPRODUCTS

Project 1703487

OCTOBER 2017 Figure 3

---- K:\Kohler Co\1703487_Parking Lot Environmental Services\In_Progress\Reports\Files From Client\CAD Files\Base Map Fig 3.dwg - 10/30/2017

Table 1.

Soil Analytical Summary
Kohler Co. Plant Parking Lot
444 Highland Drive, Kohler, WI

		Wisconsin Regulatory Standards[1,2]				Sample Location	East Base #1	East Base #2	East Wall	Excavation Area 2 - Soil Pile #1	Excavation Area 2 - Soil Pile #2	Excavation Area 2 - Soil Pile #3	Excavation Area 2 - Soil Pile #4	Excavation Area 2 - Composite	NSS-1	NSS-1	NSS-1	NSS-2	NSS-2	NSS-2
						Sample Date	9/27/16	10/13/16	10/13/16	9/29/16	9/29/16	9/29/16	9/29/16	10/14/16	4/11/17	4/11/17	4/11/17	4/11/17	4/11/17	4/11/17
		BTV	Non-Industrial DC	Industrial DC	GW	Sample Depth (ft)	23.0	15.0	8.0	0.5-23	0.5-20	0.5-18	0.5-15	NE	1.0-3.0	6.0-8.0	13.0-15.0	1.0-3.0	6.0-8.0	13.0-15.0
	CAS #					Beneath/Outside Fill Zone[5]	Yes	Yes	Yes								Yes			Yes
METALS (detected analytes)[3,4] (mg/kg)																				
Copper	7440-50-8	35	3,130	46,700	91.6		24.2	8.02	14.3	--	--	--	--	463	84.8	644	14.4	3746	22.3	15.5
Lead	7439-92-1	52	400	800	27		5.76	2.2	18.3	67.4	**1450**	73.2	358	94.9	106	*453*	3.89	230	3.92	2.79
Zinc	7440-66-6	150	23,500	100,000	NE		19.2	7.76	32.9	--	--	--	--	352	207	405	10.4	2081	13.4	11.5

Notes

(mg/kg) = milligrams per kilogram; (µg/kg) = micrograms per kilogram; -- = not analyzed;
< = not detected above method detection limit; DC = Direct Contact; GW = Groundwater
J = concentration between detection limit and reporting limit; NE = Not Established;

[1] NR 720 RCL = Chapter NR 720, Wisconsin Administrative Code, Residual Contaminant Level.

[2] RCLs & BTVs are based on USEPA methodology; presented in WDNR Guidance, Soil RCL Determinations using USEPA Regional Screening Level Web Calculator (RR-890) and summarized in the WDNR's R&R Program RCE Spreadsheet (March 2017).

[3] Only detected analytes are listed; refer to the laboratory analytical reports for a full list of assessed analytes

[4] Metal concentrations above an RCL, but not noted as such on this table, are considered to be representative of background conditions in Wisconsin soils.

[5] Sample collected outside or beneath the zone observed to contain historic fill defined as historic cast iron byproducts with pockets of brass machining and die casting byproducts.

Exceeds the NR 720 Non-Industrial Direct Contact RCL: *100* Exceeds the NR 720 Industrial Direct Contact RCL: **100**

Exceeds the BTV: 100

Table 1.

Soil Analytical Summary
Kohler Co. Plant Parking Lot
444 Highland Drive, Kohler, WI

						Sample Location	SSS-1	SSS-1	SSS-1	SSS-2	SSS-2	SSS-2	SSS-3	SSS-3	SSS-3	Hydro-Excavation Box #1	WSS-2 (Base)	North Test Pit	North Test Pit	Bollard Excavation
		Wisconsin Regulatory Standards[1,2]				Sample Date	5/6/17	5/6/17	5/6/17	5/6/17	5/6/17	5/6/17	5/6/17	5/6/17	5/6/17	5/17/17	7/27/17	7/27/17	7/27/17	9/5/17
		BTV	**Non-Industrial DC**	**Industrial DC**	**GW**	Sample Depth (ft)	1.0-3.0	6.0-8.0	10.0-12.0	1.0-3.0	6.0-8.0	10.0-12.0	1.0-3.0	6.0-8.0	10.0-12.0	0.5-4.0	4.0	2.0-4.0	4.0-6.0	3.0
	CAS #					Beneath/Outside Fill Zone[5]		Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes			Yes	Yes	
METALS (detected analytes)[3,4] (mg/kg)																				
Copper	7440-50-8	35	3,130	46,700	91.6		34.6	12.5	7.67	60.6	9.90	8.95	13.2	10.7	10.7	310	9.39	59.5	8.07	--
Lead	7439-92-1	52	400	800	27		280	10.1	15.0	16.6	2.68	3.57	3.29	3.32	2.98	*685*	2.41	10.6	2.05	177
Zinc	7440-66-6	150	23,500	100,000	NE		491	26.9	13.9	52.5	11.2	11.7	18.1	16.1	15.7	2040	10.7	37.1	8.78	--

Notes

(mg/kg) = milligrams per kilogram; (µg/kg) = micrograms per kilogram; -- = not analyzed;
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[3] Only detected analytes are listed; refer to the laboratory analytical reports for a full list of assessed analytes

[4] Metal concentrations above an RCL, but not noted as such on this table, are considered to be representative of background conditions in Wisconsin soils.

[5] Sample collected outside or beneath the zone observed to contain historic fill defined as historic cast iron byproducts with pockets of brass machining and die casting byproducts.

Exceeds the NR 720 Non-Industrial Direct Contact RCL: *100* Exceeds the NR 720 Industrial Direct Contact RCL: **100**

Exceeds the BTV: 100

Table 2.

TCLP Lead Analytical Summary
Kohler Co. Plant Parking Lot
444 Highland Drive, Kohler, WI

Sample No.	Excavation Area #1	Excavation Area #1 Sample 1-1	Excavation Area #1 Sample 1-2	Excavation Area #2 - Soil Pile #1	Excavation Area #2 - Soil Pile #2	Excavation Area #2 - Soil Pile #3	Excavation Area #2 - Soil Pile #4	East Wall Composite	Excavation Area #3	Phase 2 Storm Sewer Soil	SSS-1, SSS-2 Composite	Hydro-Excavation Slurry	Hydro-Excavation Slurry Box #1	Hydro-Excavation Slurry Box #2	Hydro-Excavation Slurry Box #3	Hydro-Excavation Slurry Box #4	Hydro-Excavation Slurry Box #5	Hydro-Excavation Slurry Box #6	Phase 3 (West) Soil Composite #1 (WSS-1)	Phase 3 (West) Soil Composite #2 (WSS-2)	Fence Post Hole Excavation Slurry	Bollard Excavation Slurry	TCLP Limit
Sample Date	9/27/16	11/3/16	11/3/16	10/3/16	10/3/16	10/3/16	10/3/16	10/5/16	10/13/16	4/11/17	5/6/17	5/21/17	5/17/17	5/21/17	5/26/17	5/26/17	5/26/17	6/1/17	7/5/17	7/5/17	7/5/17	9/5/17	
TCLP Lead (mg/L)	**8.54**	**6.2**	**26.0**	0.283	0.178	2.10	0.247	3.77	0.117	0.163	0.137	2.09	1.86	**18.8**	**20.5**	**7.61**	3.75	**5.08**	**33.8**	<0.0095	1.38	0.236	5.0

Notes

(mg/L) = milligrams per liter TCLP = Toxicity Characteristic Leaching Procedure < = analyte not detected above method detection limit

Maximum Concentration of Contaminants for Toxicity Characteristic are referenced in the Code of Federal Regulations (CFR) 40 CFR§ 261.24 - Toxicity Characteristic Leaching Procedure and Characteristic Hazardous Wastes.

PCBs = Polychlorinated Biphenyls TCLP = Toxicity Characteristic Leaching Procedure

PHOTOGRAPHIC LOG

PHOTOGRAPH NO: 1	DATE: September 2016	GEI PROJECT NO: 1703487	CLIENT: Kohler Company
DIRECTION: NA	SITE LOCATION: Kohler Plant Parking Lot, 444 Highland Drive, Kohler, WI		
DESCRIPTION: Excavation Area #2 for a parking lot storm sewer installation. Note darker historic cast iron byproducts fill including refractory bricks and other non-soil materials, and excavation extending into clayey native soil (bottom of photograph).			

PHOTOGRAPH NO: 2	DATE: September 2016	GEI PROJECT NO: 1703487	CLIENT: Kohler Company
DIRECTION: NA	SITE LOCATION: Kohler Plant Parking Lot, 444 Highland Drive, Kohler, WI		
DESCRIPTION: Historic cast iron byproducts fill excavated from Excavation Area #1.			

PHOTOGRAPHIC LOG

PHOTOGRAPH NO: 3	**DATE:** August 2017	**GEI PROJECT NO:** 1703487	**CLIENT:** Kohler Company
DIRECTION: NA	**SITE LOCATION:** Kohler Plant Parking Lot, 444 Highland Drive, Kohler, WI		
DESCRIPTION: WSS-1 sample location immediately west of Excavation Area #1. Note darker historic cast iron byproducts fill including refractory bricks and white apparent enamel powder.			

PHOTOGRAPH NO: 4	**DATE:** April 2017	**GEI PROJECT NO:** 1703487	**CLIENT:** Kohler Company
DIRECTION: NA	**SITE LOCATION:** Kohler Plant Parking Lot, 444 Highland Drive, Kohler, WI		
DESCRIPTION: Historic cast iron byproducts fill consisting primarily of refractory brick excavated north of NSS-1 for the storm sewer installation.			

PHOTOGRAPHIC LOG

PHOTOGRAPH NO: 5	DATE: April 2017	GEI PROJECT NO: 1703487	CLIENT: Kohler Company
DIRECTION: W	SITE LOCATION: Kohler Plant Parking Lot, 444 Highland Drive, Kohler, WI		
DESCRIPTION: Historic cast iron byproducts fill including buffing felts and refractory brick excavated north of NSS-1 for the storm sewer installation.			

PHOTOGRAPH NO: 6	DATE: June 2017	GEI PROJECT NO: 1703487	CLIENT: Kohler Company
DIRECTION: NW	SITE LOCATION: Kohler Plant Parking Lot, 444 Highland Drive, Kohler, WI		
DESCRIPTION: Historic cast iron byproducts fill including foundry slag removed from excavations for covered walkway structural supports.			

PHOTOGRAPHIC LOG

PHOTOGRAPH NO: 7	**DATE:** June 2017	**GEI PROJECT NO:** 1703487	**CLIENT:** Kohler Company
DIRECTION: W	**SITE LOCATION:** Kohler Plant Parking Lot, 444 Highland Drive, Kohler, WI		
DESCRIPTION: Covered walkway post hole excavation east of the electric melt shop and within the area of composite sample for Slurry Box #3.			

PHOTOGRAPH NO: 8	**DATE:** November 2016	**GEI PROJECT NO:** 1703487	**CLIENT:** Kohler Company
DIRECTION: E	**SITE LOCATION:** Kohler Plant Parking Lot, 444 Highland Drive, Kohler, WI		
DESCRIPTION: Clean soil excavated for the storm sewer installation east of Excavation Area #2.			

PHOTOGRAPHIC LOG

PHOTOGRAPH NO: 9	DATE: May 2017	GEI PROJECT NO: 1703487	CLIENT: Kohler Company
DIRECTION: NA	SITE LOCATION: Kohler Plant Parking Lot, 444 Highland Drive, Kohler, WI		
DESCRIPTION: Test Pit SSS-2 showing shallow native clay layer and overlain by a thin layer of foundry sand fill. Historic iron byproducts fill was not observed in the test pit.			

PHOTOGRAPH NO: 10	DATE: August 2017	GEI PROJECT NO: 1703487	CLIENT: Kohler Company
DIRECTION: NA	SITE LOCATION: Kohler Plant Parking Lot, 444 Highland Drive, Kohler, WI		
DESCRIPTION: North Test Pit showing shallow native clay layer and overlain by a thin layer of foundry sand fill. Historic iron byproducts fill was not observed in the test pit.			

PHOTOGRAPHIC LOG

PHOTOGRAPH NO: 11	DATE: October 1999	GEI PROJECT NO: 1703487	CLIENT: Kohler Company
DIRECTION: NW	SITE LOCATION: Kohler Plant Parking Lot, 444 Highland Drive, Kohler, WI		
DESCRIPTION: Excavation of petroleum impacted soil from the southernmost Gate 5 underground storage tank excavation. Historic iron byproducts fill was not observed in the excavation.			

PHOTOGRAPH NO: 12	DATE: October 1999	GEI PROJECT NO: 1703487	CLIENT: Kohler Company
DIRECTION: NA	SITE LOCATION: Kohler Plant Parking Lot, 444 Highland Drive, Kohler, WI		
DESCRIPTION: Southernmost Gate 5 underground storage tank excavation. Historic iron byproducts fill was not observed in the excavation.			

Information To Build On
Engineering • Consulting • Testing

SOIL BORING LOG: B - 2

Project: Kohler Main Parking Lot
Project No.: 0094310

Location: Kohler, Wisconsin
Drill Date: January 15, 2016
Drilled By: GW

DEPTH/EL. (feet)	VISUAL SOIL CLASSIFICATION GROUND SURFACE ELEVATION: 673.4	SAMPLE NO.	N (bpf)	Qp (tsf)	Qu (tsf)	MC (%)	REMARKS
672.9	0-5": ASPHALT Pavement						
	5-10": Brown Gravelly SAND, with trace silt, moist (BASE COURSE)	1-AU	-			2	
1 672.4	Brown Silty CLAY, with dark brown seams and trace sand and asphalt pieces, moist (FILL)						
671.9		2-SS	22	2.5		12	
2 671.4							
670.9	Gray GRAVEL, with trace clay chunks, moist (FILL)						
3 670.4		3-SS	18			12	
669.9							
4 669.4	Dark brown to brown Silty CLAY, moist						
668.9							
5 668.4		4-SS	13	2.0		19	⊥
667.9							
6 667.4							
	END OF BORING @ 6± FEET						

FIELD OBSERVATIONS

Water Level $_{\text{during drilling}}$: Not encountered ▽
Water Level $_{\text{upon completion}}$: Dry ▼
Caved at $_{\text{upon completion}}$: 6± feet below existing grade (EL. 667.4±) ⊥
Delay Time: N/A
Water Level $_{\text{delayed}}$: N/A ¥
Caved at $_{\text{delayed}}$: N/A

ADDITIONAL COMMENTS:

Note: Lines of stratification represent an **approximate** boundary between soil types. Variations may occur between sampling intervals and/or boring locations. Transitions may also be gradual. Dashed lines are indicative of potentially erratic or unknown transitions, such as fill-to-natural soil zone transitions.

Information To Build On
Engineering • Consulting • Testing

SOIL BORING LOG: B - 3

Project: Kohler Main Parking Lot
Project No.: 0094310

Location: Kohler, Wisconsin
Drill Date: January 15, 2016
Drilled By: GW

DEPTH/EL. (feet)	VISUAL SOIL CLASSIFICATION GROUND SURFACE ELEVATION: 674.6	SAMPLE NO.	N (bpf)	Qp (tsf)	Qu (tsf)	MC (%)	REMARKS
	0-3": ASPHALT Pavement						
674.1	3-5": Light brown Gravelly SAND, with trace silt, moist (BASE COURSE)	1-AU	-			2	
1 673.6	Very dark brown to black Silty SAND, with trace gravel and asphalt pieces, moist (FILL)						
673.1		2-SS	30			20	
2 672.6							
672.1	Dark brown Silty CLAY, with sand and gravel, moist (FILL)						
3 671.6		3-SS	29			16	
671.1							
4 670.6	Dark brown Silty CLAY, with sand, moist						
670.1	Brown Silty CLAY, moist						
5 669.6		4-SS	13	3.5		19	⊥
669.1							
6 668.6							
	END OF BORING @ 6± FEET						

FIELD OBSERVATIONS

Water Level during drilling: Not encountered ▽
Water Level upon completion: Dry ▼
Caved at upon completion: 6± feet below existing grade (EL. 668.6±) ⊥
Delay Time: N/A
Water Level delayed: N/A ¥
Caved at delayed: N/A

ADDITIONAL COMMENTS:

Note: Lines of stratification represent an **approximate** boundary between soil types. Variations may occur between sampling intervals and/or boring locations. Transitions may also be gradual. Dashed lines are indicative of potentially erratic or unknown transitions, such as fill-to-natural soil zone transitions.

Information To Build On
Engineering • Consulting • Testing

SOIL BORING LOG: B - 4

Project: Kohler Main Parking Lot
Project No.: 0094310

Location: Kohler, Wisconsin
Drill Date: January 15, 2016
Drilled By: GW

DEPTH/EL. (feet)	VISUAL SOIL CLASSIFICATION GROUND SURFACE ELEVATION: 673.6	SAMPLE NO.	N (bpf)	Qp (tsf)	Qu (tsf)	MC (%)	REMARKS
	0-4": ASPHALT Pavement						
673.1	Dark brown Silty SAND, with asphalt pieces and trace gravel, very moist (FILL)	1-AU	-			6	
1 672.6							
672.1		2-SS	27			25	
2 671.6							
671.1		3-SS*	7			-	
3 670.6							
670.1							
4 669.6	Brown Silty SAND, very moist						
669.1		4-SS	6			21	⊥
5 668.6	Brown Sandy CLAY, with silt, moist						
668.1							
6 667.6							
	END OF BORING @ 6± FEET						

FIELD OBSERVATIONS

Water Level during drilling: Not encountered ⩒
Water Level upon completion: Dry ▼
Caved at upon completion: 6± feet below existing grade (EL. 667.6±) ⊥
Delay Time: N/A
Water Level delayed: N/A ¥
Caved at delayed: N/A

ADDITIONAL COMMENTS:

* No sample recovery

Note: Lines of stratification represent an **approximate** boundary between soil types. Variations may occur between sampling intervals and/or boring locations. Transitions may also be gradual. Dashed lines are indicative of potentially erratic or unknown transitions, such as fill-to-natural soil zone transitions.

Information To Build On
Engineering • Consulting • Testing

SOIL BORING LOG: B - 7

Project: Kohler Main Parking Lot
Project No.: 0094310

Location: Kohler, Wisconsin
Drill Date: January 15, 2016
Drilled By: GW

DEPTH/EL. (feet)	VISUAL SOIL CLASSIFICATION GROUND SURFACE ELEVATION: 671.1	SAMPLE NO.	N (bpf)	Qp (tsf)	Qu (tsf)	MC (%)	REMARKS
	0-4": ASPHALT Pavement						
670.6	Dark grayish brown Silty SAND, with gravel, trace clay and asphalt pieces, moist (FILL)	1-AU	-			20	
1 670.1	Brown Silty CLAY, moist						
669.6		2-SS	9			20	
2 669.1	Light brown Silty Fine SAND, moist						
668.6	Light brown Sandy SILT, moist						
3 668.1		3-SS	14			18	
667.6							
4 667.1	Light brown SILT, with trace sand, wet						v ▼
666.6							
5 666.1		4-SS	14			18	⊥
665.6							
6 665.1	END OF BORING @ 6± FEET						

FIELD OBSERVATIONS

Water Level $_{\text{during drilling}}$: 4± feet below existing grade (EL. 667.1±) v
Water Level $_{\text{upon completion}}$: 4± feet below existing grade (EL. 667.1±) ▼
Caved at $_{\text{upon completion}}$: 6± feet below existing grade (EL. 665.1±) ⊥
Delay Time: N/A
Water Level $_{\text{delayed}}$: N/A ¥
Caved at $_{\text{delayed}}$: N/A

ADDITIONAL COMMENTS:

Note: Lines of stratification represent an **approximate** boundary between soil types. Variations may occur between sampling intervals and/or boring locations. Transitions may also be gradual. Dashed lines are indicative of potentially erratic or unknown transitions, such as fill-to-natural soil zone transitions.

Information To Build On
Engineering • Consulting • Testing

SOIL BORING LOG: B - 8

Project: Kohler Main Parking Lot
Project No.: 0094310

Location: Kohler, Wisconsin
Drill Date: January 15, 2016
Drilled By: GW

DEPTH/EL. (feet)	VISUAL SOIL CLASSIFICATION GROUND SURFACE ELEVATION: 672.8	SAMPLE NO.	N (bpf)	Qp (tsf)	Qu (tsf)	MC (%)	REMARKS
	0-5": ASPHALT Pavement						
672.3							
	Dark gray SAND, with silt and trace gravel, very moist (FILL)	1-AU	-			10	
1 671.8							
	Brown Silty CLAY, with dark brown seams and trace sand and gravel, moist (FILL)						
671.3		2-SS	9	2.3	1.8	14	
2 670.8							
670.3							
3 669.8		3-SS	26	1.5		18	
669.3							
4 668.8							
	Light grayish brown Silty CLAY, with trace asphalt pieces, moist (FILL)						
668.3							
5 667.8		4-SS	12	1.8		16	⊥
667.3							
6 666.8							
	END OF BORING @ 6± FEET						

FIELD OBSERVATIONS

Water Level during drilling: Not encountered ▽
Water Level upon completion: Dry ▼
Caved at upon completion: 6± feet below existing grade (EL. 666.8±) ⊥
Delay Time: N/A
Water Level delayed: N/A ¥
Caved at delayed: N/A

ADDITIONAL COMMENTS:

Note: Lines of stratification represent an **approximate** boundary between soil types. Variations may occur between sampling intervals and/or boring locations. Transitions may also be gradual. Dashed lines are indicative of potentially erratic or unknown transitions, such as fill-to-natural soil zone transitions.

Information To Build On
Engineering • Consulting • Testing

SOIL BORING LOG: B - 9

Project: Kohler Main Parking Lot
Project No.: 0094310

Location: Kohler, Wisconsin
Drill Date: January 15, 2016
Drilled By: GW

DEPTH/EL. (feet)	VISUAL SOIL CLASSIFICATION GROUND SURFACE ELEVATION: 672.3	SAMPLE NO.	N (bpf)	Qp (tsf)	Qu (tsf)	MC (%)	REMARKS
	0-3": ASPHALT Pavement						
671.8	Very dark brown Silty SAND, with gravel, very moist (FILL)	1-AU	-			15	
1 671.3	Brown Silty CLAY, moist (FILL)						
670.8		2-SS	10	3.5		18	
2 670.3							
669.8		3-SS	10	2.0		15	
3 669.3							
668.8							
4 668.3							
667.8		4-SS	6	2.0		47	⊥
5 667.3	Very dark brown Silty CLAY, with root matter, moist (BURIED TOPSOIL)						
666.8							
6 666.3							
	END OF BORING @ 6± FEET						

FIELD OBSERVATIONS

Water Level $_{\text{during drilling}}$: Not encountered ▽
Water Level $_{\text{upon completion}}$: Dry ▼
Caved at $_{\text{upon completion}}$: 6± feet below existing grade (EL. 666.3±) ⊥
Delay Time: N/A
Water Level $_{\text{delayed}}$: N/A ¥
Caved at $_{\text{delayed}}$: N/A

ADDITIONAL COMMENTS:

Note: Lines of stratification represent an **approximate** boundary between soil types. Variations may occur between sampling intervals and/or boring locations. Transitions may also be gradual. Dashed lines are indicative of potentially erratic or unknown transitions, such as fill-to-natural soil zone transitions.

State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
Waukesha Service Center
141 NW Barstow, Room 180
Waukesha, WI 53188

Scott Walker, Governor
Cathy Stepp, Secretary
Telephone 608-266-2621
Toll Free 1-888-936-7463
TTY Access via relay - 711

March 11, 2016

FILE REF: FID #460015270
Sheboygan County
SW/Correspondence

Mr. Tony Biddle
Kohler Company
444 Highland Drive, M/S 009
Kohler, WI 53044

Subject: Beneficial Use of Industrial Byproduct Project at Kohler Company located at 444 Highland Drive, Kohler WI, Sheboygan County, Wisconsin

Kohler Co Main Associate Parking Lot Project

Dear Mr. Biddle,

The purpose of this letter is to notify you that the Department concurs with the proposed beneficial use of Kohler Co industrial byproducts to reconstruct the 22 acre Kohler Co Main associate parking lot with construction to commence early April 2016 (weather and ground conditions permitting).

On February 29, 2016 the Department received your request for concurrence to beneficially use industrial byproducts as an confined geotechnical fill under s. NR 538.10(5)(b), Wis. Adm. Code. The project as described will use 20,000 to 29,000 cubic yards of Category 1 and 2 approved byproducts (pottery cull, green sand, slag, resin bonded sand) generated at the Kohler Co in Kohler, WI. Reconstruction of will incorporate industrial byproduct to increase current subgrade elevations from existing grade to provide safer vehicle trafficability and improve stormwater management.

The following performance standards were addressed in notification:

- Kohler Co byproduct materials are RCRA non-hazardous, classified as NR 538 Category 1 and 2 and therefore are appropriate for this project.
- Based on information from nearby groundwater monitoring well groundwater is greater than 10 feet below land surface.
- Closest surface water body is located approximately one-quarter mile south of site. All necessary construction stormwater permits will be obtained prior to construction work will begin.
- The reconstruction is occurring on an existing parking lot.
- Placement of industrial byproducts will not extend beyond the limits of paved area
- Fill volumes will not exceed 3,000 cubic yards per half acre.
- Industrial byproducts will be placed above grade in 6- to 12-inch compacted lifts.
- Depth of fill is less than 4 feet below the natural ground surface

Other NR 538 requirements associated with this project:

- Placement of pavement shall be completed as soon as practical after placement of industrial byproduct
- Byproducts will not be placed below the water table, into permanent standing water or areas that need to be dewatered prior to placement.

- Industrial byproduct will not be placed closer than 200 feet from a private or public water well without written consent of the property owner.
- Greater than 10,000 cubic yards will be used, therefore Byproduct Property Owner Notification (Form 4400-199), Page 1 and 2 must be completed and include an affidavit recorded with the register of deeds within 60 days of completing the placement.

The project must be conducted in a manner to minimize windblown dust, odor, tracking and spillage of the industrial byproduct and will not cause nuisance conditions or environmental pollution.

With this concurrence, you are still obligated to comply with the requirements of all other applicable federal, state and local laws, codes and permits. The Department may, at its discretion, inspect the project for conformance with the submitted plans and good construction practice.

If you have any questions regarding this letter or the attached draft, please contact Ruth O'Donnell, Waste Management Specialist at 262-574-2157.

Sincerely,

Ruth O'Donnell

Ruth O'Donnell, CHMM
Waste Management Specialist
DNR Waste & Materials Management Program

cc: Kohler Company BU File

43

Joslin, Richard R - DNR

From: Tresp Dan <DANIEL.TRESP@kohler.com>
Sent: Thursday, May 18, 2017 10:24 AM
To: Joslin, Richard R - DNR
Subject: RE: Kohler Co. Parking Lot Project - BRRTS Activity # 02-60-578171

Hi Rick. Sounds good. I'm keeping a close eye on the project today so I will be in and out of the office. If you don't reach me at my desk please try my cell....920-889-6910.

Thank you.

From: Joslin, Richard R - DNR [mailto:Richard.Joslin@wisconsin.gov]
Sent: Thursday, May 18, 2017 9:00 AM
To: Tresp Dan <DANIEL.TRESP@kohler.com>
Subject: RE: Kohler Co. Parking Lot Project - BRRTS Activity # 02-60-578171

Dan I apologize for not getting back to you sooner. I took a new position within the DNR. I have started to transition into this position about a week or two ago. Let me give you a call late morning to discuss project status and we can go from there. How does that work for you?

Rick

We are committed to service excellence.
Visit our survey at http://dnr.wi.gov/customersurvey to evaluate how I did.

Richard R. Joslin
Hydrogeologist / NER Spills Coordinator – Remediation & Redevelopment Bureau
Wisconsin Department of Natural Resources
625 East County Road Y, Suite 700, Oshkosh, WI 54901-9731
Phone: (920) 424-7077
Cell Phone: (920) 360-4291
Richard.Joslin@Wisconsin.gov


dnr.wi.gov


From: Tresp Dan [mailto:DANIEL.TRESP@kohler.com]
Sent: Monday, May 15, 2017 8:15 AM
To: Joslin, Richard R - DNR
Subject: FW: Kohler Co. Parking Lot Project - BRRTS Activity # 02-60-578171

Hello Rick.

Characterization of soil from storm sewer excavation areas is just about complete. Lab results for the most recent sampling event are expected today.

I have been corresponding with Roger Miller, GEI Consultants, on this project. Would you be available in the next week or two for either a site visit or a conference call with Roger?

Thanks.
Dan

From: Tresp Dan
Sent: Friday, March 10, 2017 1:30 PM
To: Joslin, Richard R - DNR <Richard.Joslin@wisconsin.gov>
Cc: Tresp Dan <DANIEL.TRESP@kohler.com>
Subject: FW: Kohler Co. Parking Lot Project - BRRTS Activity # 02-60-578171

Rick,

As we discussed by phone, phases 2 and 3 of the Kohler Co. parking lot project have been approved. The timing of construction is weather dependent but we anticipate breaking ground late May, early June.

This e-mail provides an overview of the project and a summary of remediation activities that were completed last fall.

Parking Lot Construction Overview
The main Kohler Co. parking lot is being reconstructed to upgrade the storm water drainage system and to create a safe parking area. The grading plan includes an improved crown at the center portion of the lot and sloped parking areas to ensure proper drainage. The lot will be paved with 3"-5" inches of asphalt in accordance with the Wisconsin Department of Transportation design specifications. Areas that will be paved are shown on the attached **Master Site Plan C-1.**

Phase 1 construction, which was completed last fall, included paving the east half of the parking lot and adding storm sewers to the Phase 3 area. Phase 2 and 3 construction will include paving the west end of the lot and adding additional storm sewers. Attached is an **Overall Grading Plan Diagram C-11** which shows:

- Location of storm sewers installed last fall.
- Location of additional storm sewers to be installed during Phase 2 construction.
- Location of existing deep storm sewer

Area of Contamination
Historical contamination was reported to your department when lead contaminated soil was discovered during installation of a storm sewer in the Phase 3 construction area. As noted in the Hazardous Substance Discharge Notification, soil generated from the initial area of excavation failed TCLP testing for lead. This area of excavation, identified as "Excavation Area #1" is shown on the attached **Diagram A.** As excavation moved east, soil was stock-piled in 100 cubic yard piles. Samples collected from each pile were analyzed for proper waste classification. Test results are summarized in the table below. Lab reports are available upon request.

SAMPLE ID	TCLP – Pb (mg/l)	Regulatory Limit (mg/l)
Excavation Area #1 Soil	8.54	5.0
Excavation Area #2 – Soil Pile 1	0.283	5.0
Excavation Area #2 – Soil Pile 2	0.178	5.0
Excavation Area #2 – Soil Pile 3	2.100	5.0
Excavation Area #2 – Soil Pile 4	0.247	5.0
Excavation Area #3 Soil	0.117	5.0

Soil Disposal
An estimated 90 cubic yards of hazardous waste soil generated from excavation area #1 was disposed of through Veolia Environmental Services. An estimated 1200 cubic yards of non-hazardous waste soil generated from excavation areas #2 and #3 was disposed of at Waste Management's Ridgeview Landfill. Soil generated east of excavation area #3 did not show signs of contamination. This virgin clay was reused as subbase fill in the Phase 1 construction area.

Site Investigation & Follow-up
Wall and base samples were collected from the storm sewer excavation area to define the vertical and horizontal extent of contamination. The sampling points and test results are provided on the attached **Diagram B.** Environmental data from other BRRTS sites at the Kohler campus shows ground water at depths of 25-35 feet. Based on this information, ground water has not been impacted as the depth of contamination did not extend beyond 15 feet deep.

The extent of contamination will be further investigated during storm sewer work scheduled during Phase 2 construction. As shown on the Overall Grading Plan Diagram, additional storm sewers will be installed adjacent to the area of contamination.

Let me know when you would have time to further discuss options for meeting the requirements described in the "Responsible Party" letter dated October 20, 2016.

Thank you.

Dan Tresp
Kohler Co.
dan.tresp@kohler.com
Ph: (920) 457-4441 (Ext. 77210)
Fx: (920) 459-1682

Give Thought. Take Action.
KOHLER. Stewardship

From: Joslin, Richard R - DNR [mailto:Richard.Joslin@wisconsin.gov]
Sent: Friday, November 11, 2016 2:32 PM
To: Tresp Dan <DANIEL.TRESP@kohler.com>
Subject: RE: Kohler Co. Parking Lot Project - BRRTS Activity # 02-60-578171

Thanks Dan for the update. Agree with the proposed approach outlined below. Provide the documentation when you have a chance. Lets have a quick discussion before activities commence in spring 2017.

Have a great weekend!

We are committed to service excellence.
Visit our survey at http://dnr.wi.gov/customersurvey to evaluate how I did.

Richard R. Joslin
Hydrogeologist – Remediation & Redevelopment Bureau
Wisconsin Department of Natural Resources
2984 Shawano Avenue, Green Bay WI 54313-6727
Phone: (920) 662-5165
Cell Phone: (920) 360-4291
Richard.Joslin@Wisconsin.gov

dnr.wi.gov

From: Tresp Dan [mailto:DANIEL.TRESP@kohler.com]
Sent: Friday, November 11, 2016 10:32 AM
To: Joslin, Richard R - DNR
Cc: Plass Jeff; Hafele Myron; Tresp Dan
Subject: Kohler Co. Parking Lot Project - BRRTS Activity # 02-60-578171

Rick,
Thanks again for discussing our parking lot project by conference call last Wednesday, November 2. As agreed, I'm writing this email to:

- confirm our discussion and to get your agreement, and
- to provide you with timing regarding several data packets we committed to provide.

Agreement
Kohler Co. is in receipt of your letter dated October 20, 2016 which describes specific actions that must be taken within 30, 60, and 90 days. In our November 2 discussion, we agreed to extend these deadlines until Spring of 2017 which will allow time to further investigate the extent of contamination, to complete the remainder of the parking lot construction project, and handle the entire parking lot renovation under a single BRRTS Activity Number. NOTE: Phase 2 of the parking lot project will include installation of a north/south storm sewer which will tie into the manhole area excavated this Fall. This storm sewer work is tentatively scheduled for May of 2017.

Thank you for granting this extension. This will not pose a risk of contamination spreading into the environment as there is no evidence that groundwater has been impacted by this release, and the area of excavation has been sealed with an asphalt cap (photo below). Please reply to this e-mail, to confirm we have understood the agreement correctly.

Timing for Additional Data
By Wednesday, November 16th, Kohler Co. will provide additional information regarding the following aspects of the site:

- Parking Lot Construction Overview
- Nature of Contamination
- Waste Soil Classification
- Test Results
- Soil Disposal Detail
- Site Investigation & Follow-up Discussion

I appreciate your time and look forward to your response.

Thanks,
Dan

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Sent: Friday, March 10, 2017 1:30 PM
To: Joslin, Richard R - DNR
Cc: Tresp Dan
Subject: FW: Kohler Co. Parking Lot Project - BRRTS Activity # 02-60-578171
Attachments: Master Site Plan C-1.pdf; Overall Grading Diagram C-11.pdf; Diagram A - Area of Contamination.docx; Diagram B - Verification Sample Collection Points.docx

Categories: WORK - Important

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dan.tresp@kohler.com
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Hydrogeologist – Remediation & Redevelopment Bureau
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To: Joslin, Richard R - DNR
Cc: Plass Jeff; Hafele Myron; Tresp Dan
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Give Thought. Take Action.
KOHLER.Stewardship

NEW SLIDE GATE MOTOR AND CONTROLS TO REMAIN

PAVEMENT MARKING ARROW (TYP)

NEW FENCE FROM TURNSTILE TO GATE ARMS

NEW GUARD HOUSE W/SECURITY GATE ARMS

NEW MOTORIZED SLIDE GATE

RAISED, CONC. WALK, COVERED 8' WIDE

GATE # 4 TURNSTILES TO REMAIN

ASPHALT PATH

ASPHALT PATH

MOTORCYCLE PARKING CONC. PAD

LANDSCAPE BERM

24" MOUNTABLE CONC. C&G

CONCRETE RAMP

GATE # 5 NEW RELOCATED TURNSTILES

ELECTRICAL CONDUIT

HC PARKING SIGNS (TYP)

NEW LIGHTING ON 24' POLES (TYP)

24" MOUNTABLE CONC. C&G

4 MEDICAL 2 H.C. SPACES

24" MOUNTABLE CONC. C&G

MEDICAL PARKING SPACES

PHASE 2

PHASE 1

COLORED CONC. WALK, COVERED 7' WIDE

DELINEATOR (TYP)

744 SPACES W/HC AND MEDICAL

ELECTRICAL CONDUIT

NEW LIGHTING ON 24' POLES (TYP)

LANDSCAPE

LANDSCAPE BERM

TABLE TOP TRAFFIC CALMING DEVICE CONCRETE (TYP)

18" VERTICAL CONC. C&G

HEAVY ASPHALT PAVEMENT

CONCRETE PATH

MOTORCYCLE PARKING CONC. PAD

ELECTRICAL CONDUIT

NEW TRANSFORMER LOCATION WITH BOLLARDS AND CONCRETE PAD (VERIFY WITH ELECTRICAL PLANS)

LANDSCAPE

LANDSCAPE

24" MOUNTABLE CONC. C&G

REMOVE BOLLARDS AND CONCRETE PAD REMOVE TRANSFORMER

24" MOUNTABLE CONC. C&G

LANDSCAPE

24" MOUNTABLE CONC. C&G

COLORED/STAINED CONC. PVMT (TYP)

ELECTRICAL CONDUIT

NEW LIGHTING ON 24' POLES (TYP)

MEDICAL PARKING SPACES

PHASE 3A

REMOVE CURB & GUTTER INSTALLED IN PHASE 1

SNOW STORAGE

COLORED CONC. WALK, COVERED 7' WIDE

TABLE TOP TRAFFIC CALMING DEVICE CONCRETE (TYP)

COLORED CONC. WALK, COVERED 7' WIDE

272 SPACES

PHASE 1

8' WIDE SHARED-USE PATH

GATE # 8 NEW TURNSTILES AT SAME LOCATION AS EXISTING. REPLACE CONCRETE PAD.

24" MOUNTABLE CONC. C&G

ELECTRICAL CONDUIT

HANDICAP PARKING SPACES

MEDICAL PARKING SPACES

PHASE 3B

DELINEATOR (TYP)

24" MOUNTABLE CONC. C&G

8' WIDE SHARED-USE PATH

24" MOUNTABLE CONC. C&G

8' WIDE SHARED-USE PATH

EXISTING CONCRETE WALK, COVERED

TABLE TOP TRAFFIC CALMING DEVICE CONCRETE (TYP)

HANDICAP PARKING SPACES

LANDSCAPE BERM

LANDSCAPE BERM

24" MOUNTABLE CONC. C&G

8' WIDE SHARED-USE PATH

PHASE 1 PATH, CURB AND GATE 7 TURNSTILE

GATE # 7 NEW TURNSTILES AT SAME LOCATION AS EXISTING. REPLACE CONCRETE PAD.

LANDSCAPE BERM

PROPOSED ENTRANCE / EXIT BLUE STRIPE PARKING LOT

NEW SECURITY SLIDE / ROLL GATE AND SECURITY GATE ARMS

LANDSCAPE

STANDARD SPACES	2,151
HC SPACES	28
MEDICAL SPACES	50
ELECTRIC CHARGING SPACES	20
TOTAL PARKING SPACES	2,249

SCALE: 1"=60'

PAYNE & DOLAN
INCORPORATED
W6360 Design Drive | Greenville, Wisconsin 54942
TEL 920 757 7550 | FAX 920 757 2908
www.paynedolan.com

KOHLER. CO.
444 HIGHLAND DRIVE
KOHLER, WI 53044
CLIENT

KOHLER COMPANY
MAIN ASSOCIATE
PARKING LOT

VILLAGE OF KOHLER

PHASE 3 BID SET

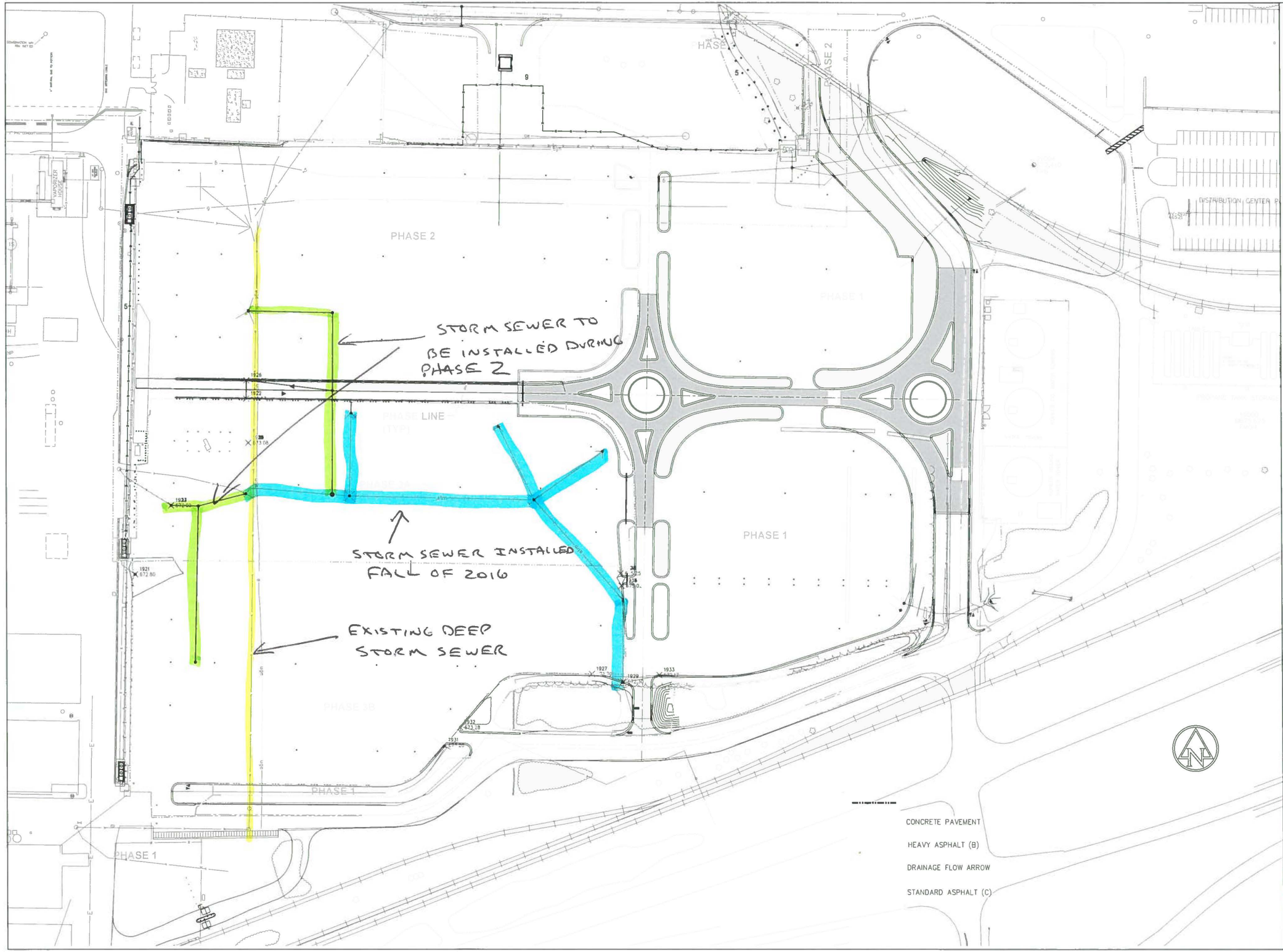
ADMINISTRATION	
DATE:	02/14/2016
ENGINEER:	SPK
DRAWN BY:	NK
CHECKED BY:	SPK
SCALE:	1" = 60'

REVISION SCHEDULE		
NO.	DESCRIPTION	DATE
1	EROSION CONTROL	4/1/2016
2	STORM SEWER	6/3/2016
3	REMOVED PHASE 3	8/11/2016
4	STORM SEWER	9/8/2016
5	TURNSTILES/PVMT	9/27/2016
6	PATH LOCATION	10/03/2016
7	STORM SEWER	12/12/2016
8	ADDED PHASE 3	01/06/2017
9	GUARD HOUSE	02/02/2017

Project Number 490018

MASTER SITE PLAN

C-1



PAYNE & DOLAN
INCORPORATED
W6360 Design Drive | Greenville, Wisconsin 54942
TEL 920.757.7550 | FAX 920.757.2906
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KOHLER. CO.
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DATE:	02/14/2016
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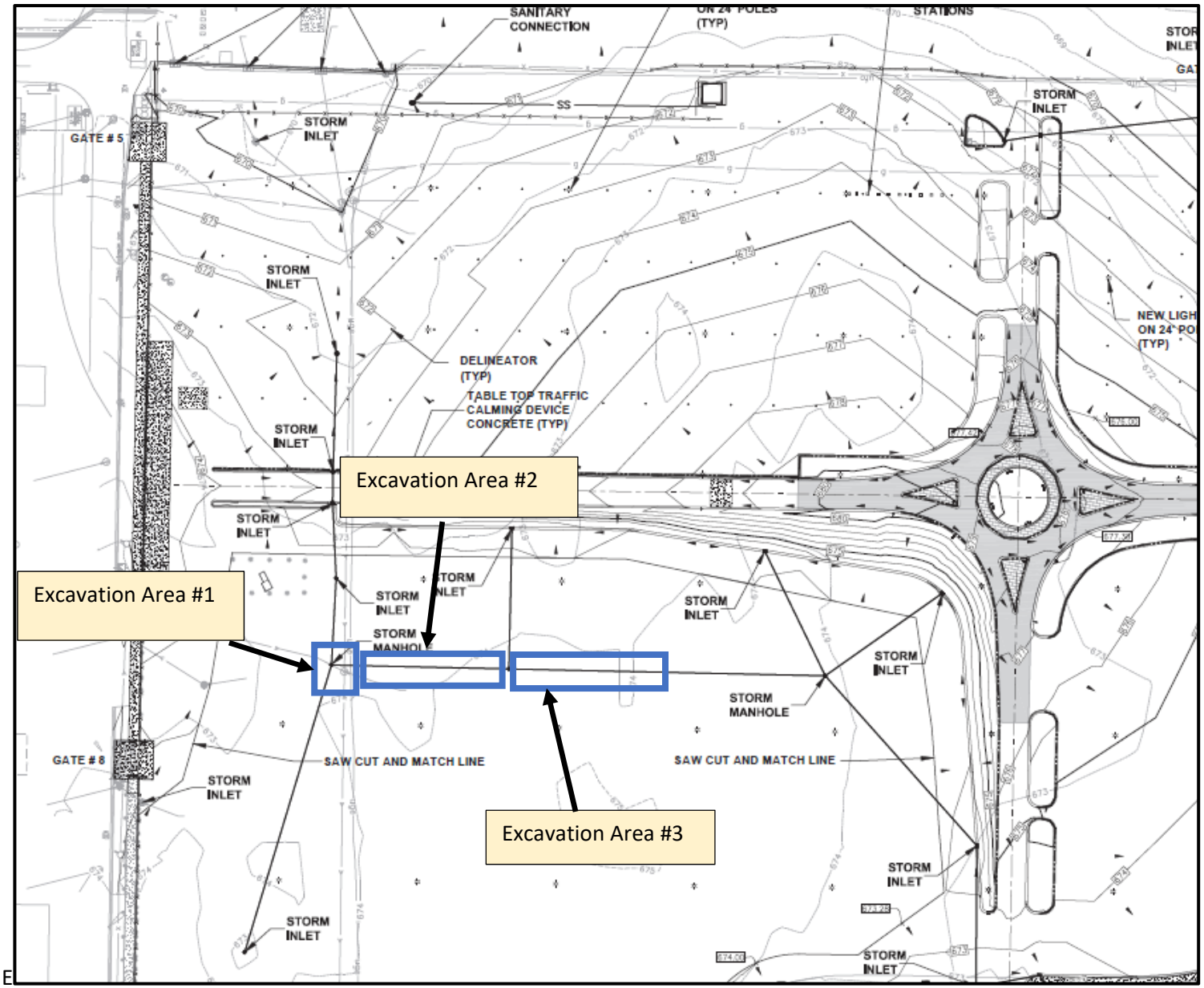
9	GUARD HOUSE	02/02/2017

Project Number 490018

OVERALL
GRADING PLAN

C-11

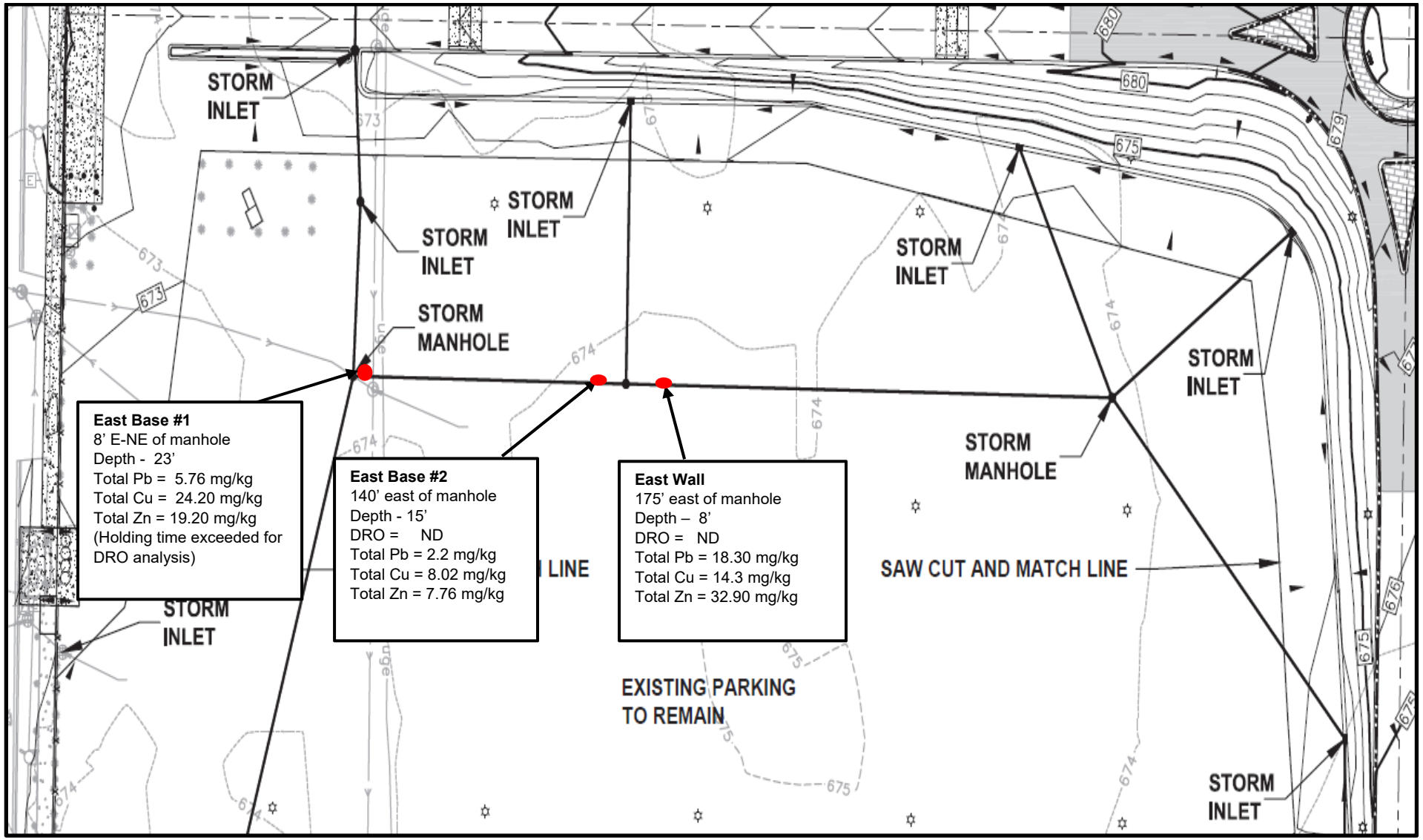
DIAGRAM A – AREA OF CONTAMINATION



E

DIAGRAM B - Verification Sample Collection Points

N



State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
Northeast Region Headquarters
2984 Shawano Avenue
Green Bay WI 54313-6727

Scott Walker, Governor
Cathy Stepp, Secretary
Telephone 608-266-2621
Toll Free 1-888-936-7463
FAX 920-662-5197
TTY Access via relay - 711

WISCONSIN
DEPT. OF NATURAL RESOURCES

October 20, 2016

Kohler Company
Mr. Dan Tresp
444 Highland Dr
Kohler WI 53044

Subject: Reported Contamination at **Kohler Co – Lead Soil Location, 444 Highland Dr, Kohler, WI**
BRRTS Activity # **02-60-578171**

Dear Mr. Tresp:

On September 30, 2016, on behalf of Kohler Company, you notified the Wisconsin Department of Natural Resources (WDNR) that lead contamination had been detected at the site described above.

Based on the information that has been submitted to the WDNR regarding this site, we believe you are responsible for investigating and restoring the environment at the above-described site under Section 292.11, Wisconsin Statutes, known as the hazardous substances spills law.

This letter describes the legal responsibilities of a person who is responsible under Section 292.11, Wis. Stats., explains what you need to do to investigate and clean up the contamination, and provides you with information about cleanups, environmental consultants, possible financial assistance, and working cooperatively with the WDNR or the Department of Agriculture, Trade and Consumer Protection (DATCP).

Legal Responsibilities:
Your legal responsibilities are defined both in statute and in administrative codes. The hazardous substances spill law, Section 292.11 (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 Code chapters NR 700 through NR 754 establish requirements for emergency and interim actions, public information, site investigations, design and operation of remedial action systems, and case closure. Wisconsin Administrative Code chapter NR 140 establishes groundwater standards for contaminants that reach groundwater.

Steps to Take:
The longer contamination is left in the environment, the farther it can spread and the more it may cost to clean up. Quick action may lessen damage to your property and neighboring properties and reduce your costs in investigating and cleaning up the contamination. To ensure that your cleanup complies with Wisconsin's laws and administrative codes, you should hire a professional environmental consultant who understands what needs to be done. The following information provides the timeframes and required steps to take. Unless otherwise approved by WDNR in writing you must complete the work by the timeframes specified.

1. Within the next **30 days,** by November 19, 2016, you should submit written verification (such as a letter from the consultant) that you have hired an environmental consultant. If you do not take action within this time frame, the WDNR may initiate enforcement action against you.

2. Within **60 days,** by December 19, 2016, you must submit a work plan for completing the investigation. The work plan must comply with the requirements in the NR 700 Wis. Adm. Code rule series and should adhere to current WDNR technical guidance documents.

3. You must initiate the site investigation within 90 days of submitting the site investigation work plan. If a fee for WDNR review has been submitted, the site investigation must begin within 60 days after receiving WDNR comments.

4. Within 60 days after completion of the field investigation and receipt of the laboratory data, you must submit a Site Investigation Report to the WDNR or other agency with administrative authority. For sites with agrichemical contamination, your case will be transferred to the DATCP for oversight.

5. Within 60 days after submitting the Site Investigation Report, you must submit a Remedial Actions Options Report.

Sites where discharges to the environment have been reported are entered into the Bureau for Remediation and Redevelopment Tracking System (BRRTS), a version of which appears on the WDNR's internet site. You may view the information related to your site at any time (http://**dnr.wi.gov/botw**/SetUpBasicSearchForm.do) and use the feedback system to alert us to any errors in the data.

If you want a formal written response from the department on a specific submittal, please be aware that a review fee is required in accordance with ch. NR 749, Wis. Adm. Code. If a fee is not submitted with your reports, you must complete the site investigation and cleanup to maintain your compliance with the spills law and chapters NR 700 through NR 754. **The timeframes specified above are required by rule, so do not delay the investigation of your site.** We have provided detailed technical guidance to environmental consultants. Your consultant is expected to know our technical procedures and administrative rules and should be able to answer your questions on meeting cleanup requirements.

All correspondence regarding this site should be sent to:

Richard Joslin
Remediation and Redevelopment Program
Wisconsin Department of Natural Resources
2984 Shawano Avenue
Green Bay WI 54313-6727
richard.joslin@wisconsin.gov

Unless otherwise directed, submit one paper copy and one electronic copy of plans and reports. To speed processing, correspondence should reference the BRRTS and FID numbers (if assigned) shown at the top of this letter.

Site Investigation and Vapor Pathway Analysis

As you develop the site investigation workplan, we want to remind you to include an assessment of the vapor intrusion pathway. Chapter NR 716, Wisconsin Administrative Code outlines the requirements for investigation of contamination in the environment. Specifically, s. NR 716.11(3)(a) requires that the field investigation determine the "nature, degree and extent, both areal and vertical, of the hazardous substances or environmental pollution in **all** affected media". In addition, section NR 716.11(5)(g) and (h) contains the specific requirements for evaluating the presence of vapors in the subsurface as well as in indoor air.

You will need to include documentation with the Site Investigation Report that explains how the assessment was done. If the vapor pathway is being ruled out, then the report needs to provide the appropriate justification for reaching this conclusion. **If the pathway cannot be ruled out, then investigation and, if appropriate, remedial action must be taken to address the risk presented prior to submitting the site for closure**. The WDNR has developed guidance to help responsible parties and their consultants comply with the requirements described above. The guidance includes a detailed explanation of how to assess the vapor intrusion pathway and provides criteria which identify when an investigation is necessary. The guidance is available at: http://dnr.wi.gov/files/pdf/pubs/rr/RR800.pdf.

Additional Information for Site Owners:
We encourage you to visit our website at http://dnr.wi.gov/topic/Brownfields/, where you can find information on selecting a consultant, financial assistance and understanding the cleanup process. You will also find information there about liability clarification letters, post-cleanup liability and more.

Information to help you select a consultant, materials on controlling costs, understanding the cleanup process, and choosing a site cleanup method are enclosed. In addition, *Fact Sheet 2 – Voluntary Party Remediation and Exemption from Liability* is enclosed and provides information on obtaining protection of limited liability under s. 292.15, Wis. Stats.

If you have questions, call Richard Joslin at 920-662-5164 for more information or visit the RR web site at the address above.

Thank you for your cooperation.

Sincerely,

Denise D. Danelski

Denise D. Danelski
Environmental Program Associate/Outreach
Remediation & Redevelopment Program

Enclosures:
1. Remediation & Redevelopment Program
2. CLEAN (Contaminated Lands Environmental Action Network)
3. Environmental Contamination – The Basics
4. Selecting an Environmental Consultant
5. Environmental Services Contractor List
6. Fact Sheet 2, VPLE

cc: Richard Joslin - NER

Joslin, Richard R - DNR

From: Tresp Dan <DANIEL.TRESP@kohler.com>
Sent: Friday, October 14, 2016 7:16 AM
To: Joslin, Richard R - DNR
Subject: RE: Kohler Co. storm sewer excavation

Rick, thanks for the information. RCL spreadsheets are very helpful. I will provide total lead results along with DRO next week.

Have a good weekend!

Dan

From: Joslin, Richard R - DNR [mailto:Richard.Joslin@wisconsin.gov]
Sent: Thursday, October 13, 2016 8:52 AM
To: Tresp Dan <DANIEL.TRESP@kohler.com>
Subject: RE: Kohler Co. storm sewer excavation

Dan

Hope things are well. During our discussion yesterday you asked about standards. Please find the link below to the WDNR website that contains the spreadsheet of soil standards.

http://dnr.wi.gov/topic/brownfields/professionals.html

Click on the link (above) and then look under the "Soil RCLs" tab. Under "2." You will see two links as shown below

2. Two versions of the RR Program's spreadsheet of RCLs with soil levels protective of the direct contact pathway and groundwater quality.
   - RCL spreadsheet for use with macro-enabled Excel program (xlsm) (recommended) - Updated June 2016
   - RCL spreadsheet (no-macro) for use with software other than Excel (xls) (file conversion may be needed before use)- Updated June 2016

Either link works just one has macros and the other does not.

In addition you did mention total lead results for some of the piles. Is it possible that along with the DRO you could also forward the total lead results?

Have a good day!

We are committed to service excellence.
Visit our survey at http://dnr.wi.gov/customersurvey to evaluate how I did.

Richard R. Joslin
Hydrogeologist – Remediation & Redevelopment Bureau

Wisconsin Department of Natural Resources
2984 Shawano Avenue, Green Bay WI 54313-6727
Phone: (920) 662-5165
Cell Phone: (920) 360-4291
Richard.Joslin@Wisconsin.gov

dnr.wi.gov

From: Tresp Dan [mailto:DANIEL.TRESP@kohler.com]
Sent: Tuesday, October 11, 2016 11:12 AM
To: Joslin, Richard R - DNR
Cc: Plass Jeff; Hafele Myron
Subject: Kohler Co. storm sewer excavation

Rick,

The lab reports and diagram I mentioned are attached.

We will call you around 3:30 p.m. today to discuss.

Thanks.
Dan

Dan Tresp
Kohler Co.
dan.tresp@kohler.com
Ph: (920) 457-4441 (Ext. 77210)
Fx: (920) 459-1682

Give Thought. Take Action.
KOHLER. Stewardship

CHEMICAL AND METALLURGICAL LABORATORY REPORT - KOHLER CO.

Report No.: 16100021
Date Issued: 10-7-16

REPORT TITLE: TCLP VOCs Concentrations in Storm Sewer Excavation Soil

OBJECTIVE

Determine if a soil sample from the storm sewer excavation project is TCLP hazardous for volatile organic compounds (VOCs). The sample was collected by Dan Tresp on 10-4-16.

CONCLUSIONS

- The soil sample is not TCLP hazardous for VOCs.

EXPERIMENTAL PROCEDURE

The sample was analyzed by following C&M Laboratory procedure 728B – Toxicity Characteristic Leaching Procedure – Zero Headspace, and 730 – Volatile Organic Compounds: Gas Chromatography/Mass Spectrometry Purge and Trap Capillary Column Techniques. The sample extraction was completed on 10-6-16. The VOC analysis was completed on 10-7-16.

Authored by: Lisa Escher, Joan Deno, Joseph Mayo **Reviewed by:** Mary Jo Grabner

Distribution:

Dan Tresp
File

RESULTS

The results relate only to the items tested.

TCLP VOCs in Storm Sewer Excavation Soil

Analyte	Concentration (µg/L)
TCLP Benzene	<1.4
TCLP Carbon Tetrachloride	<3.52
TCLP Chlorobenzene	<1.4
TCLP Chloroform	2.16
TCLP 1,4-Dichlorobenzene	<1.4
TCLP 1,2-Dichloroethane	<2.08
TCLP 1,1-Dichloroethene	<3.84
TCLP Methyl Ethyl Ketone	<7.28
TCLP Tetrachloroethene	<2.24
TCLP Trichloroethene	<1.8
TCLP Vinyl Chloride	<4.00

KOHLER

CHAIN OF CUSTODY RECORD

Chemical & Metallurgical Laboratory
444 Highland Drive, MS 205
Kohler, WI 53044
(920) 457-4441 Fax: (920) 803-4882

Report Number: 1610 0021
Report to: Dan Tresp
Account Charged: T55028F

Sampled By:
(Print Name) Dan Tresp
(Print Name)
(Print Name)

End:
Start:

Field Interf. Check
Interf. Check Result

Is this testing being conducted for regulatory monitoring? (Yes) No
If so, which regulations apply?
Drinking Water
RCRA X
NPDES
Other:

The Lab has permission to dispose of remaining sample? (Yes) No

Date	Time	Sample Description	#/Container Type (P=Plastic G=Glass) Comp	Grab	Matrix	4°C	HCl	NaOH	HNO3	H2SO4	Other	Preserv. Verified TCLP - VOCs	ANALYSES	Comments
10/4/16	1040	SS Excavation Sc. 1	1/G									X		AE23077 - AE23078

Relinquished by: Dan Tresp Date: 10/4/16 Time: am / pm

C&M LAB USE ONLY		Y	N		Y	N		Y	N
Sample Acceptance:	Hold time can be met?	✓		Sample vol. sufficient?	✓		Received on Ice?	✓	
	Bottles appropriate?	✓		VOCs free of headspace?	—		Drinking water temp on receipt:	— °C / °F	
	Bottles intact?	✓		Field filtered?	—				

Received for Lab by: Lisa Eicher Date: 10-4-16 Time: 11:45 (am) / pm

CHEMICAL AND METALLURGICAL LABORATORY REPORT - KOHLER CO.

Report No.: 16100020
Date Issued: 10-6-16

REPORT TITLE: Analysis of Excavation Site Soils for TCLP Lead

OBJECTIVE

Determine if four soil samples from the storm sewer trench excavation project are TCLP hazardous for lead. Dan Tresp collected the samples on 10-3-16.

CONCLUSIONS

- None of the soil samples are TCLP hazardous for lead.

EXPERIMENTAL PROCEDURE

The samples were analyzed by following C&M Laboratory procedures 728A – Toxicity Leaching Procedure, and 734 – Elemental Analysis by ICP Atomic Emission Spectroscopy. The TCLP extractions were completed on 10-5-16 and the lead analyses were completed on 10-6-16.

RESULTS

The results relate only to the items tested.

TCLP Lead Concentration in Storm Sewer Trench Excavation Project Soil Samples

Sample ID	TCLP Lead Concentration (mg/L)	Maximum Allowable Limit (mg/L)
Soil SP-1	0.283	5.0
Soil SP-2	0.178	5.0
Soil SP-3	2.100	5.0
Soil SP-4	0.247	5.0

Authored by: Lisa Escher, Joan Deno, Joseph Mayo **Reviewed by:** Mary Jo Grabner

Distribution:

Dan Tresp
File

KOHLER

CHAIN OF CUSTODY RECORD

Chemical & Metallurgical Laboratory
444 Highland Drive, MS 205
Kohler, WI 53044
(920) 457-4441 Fax: (920) 803-4882

Report Number: 16100020
Report to: Dan Tresp
Account Charged: TS5028F

Sampled By:
(Print Name) Dan Tresp
(Print Name)
(Print Name)

End:
Start:

Field Interf. Check
Interf. Check Result

ANALYSES

Is this testing being conducted for regulatory monitoring? (Yes) No
If so, which regulations apply?
Drinking Water
RCRA X
NPDES
Other:

The Lab has permission to dispose of remaining sample? Yes No

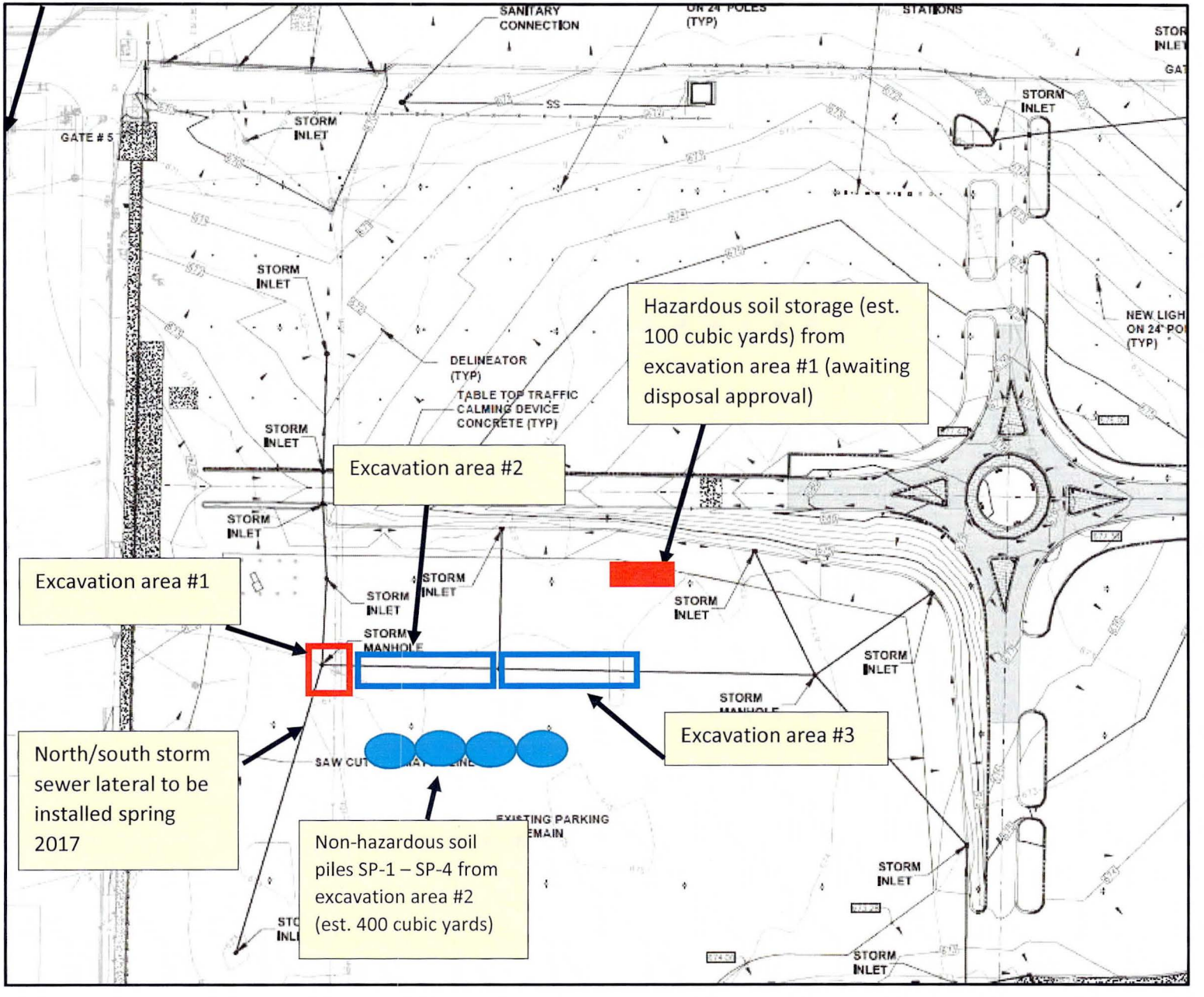
Date	Time	Sample Description	Field Preserved: Comp	Grab	Matrix	4°C	HCl	NaOH	HNO3	H2SO4	Other	Preserv. Verified	TCLP-86	Comments
			#/Container Type (P=Plastic G=Glass)											
10/3/16	0945	Soil SP-1		1/P									X	AE23069 - AE23076
10/3/16	1030	Soil SP-2		1/P									X	
10/3/16	1420	Soil SP-3		1/P									X	
10/3/16	1450	Soil SP-4		1/P									X	

Relinquished by: Dan Tresp Date: 10/4/16 Time: am / pm

C&M LAB USE ONLY

Sample Acceptance:	Y	N		Y	N		Y	N
Hold time can be met?	✓		Sample vol. sufficient?	✓		Received on Ice?	✓	
Bottles appropriate?	✓		VOCs free of headspace?	—		Drinking water temp on receipt:	— °C / °F	
Bottles intact?	✓		Field filtered?	—				

Received for Lab by: Erin Eicher Date: 10-4-16 Time: 11:45 am pm


SANITARY CONNECTION
STATIONS
GATE # 5
STORM INLET
SS
DELINEATOR (TYP)
TABLE TOP TRAFFIC CALMING DEVICE CONCRETE (TYP)
Hazardous soil storage (est. 100 cubic yards) from excavation area #1 (awaiting disposal approval)
Excavation area #2
Excavation area #1
STORM MANHOLE
Excavation area #3
North/south storm sewer lateral to be installed spring 2017
Non-hazardous soil piles SP-1 – SP-4 from excavation area #2 (est. 400 cubic yards)
EXISTING PARKING
NEW LIGH
ON 24' PO
(TYP)

Joslin, Richard R - DNR

(11)

From: Tresp Dan <DANIEL.TRESP@kohler.com>
Sent: Wednesday, October 05, 2016 2:09 PM
To: Joslin, Richard R - DNR
Cc: Tresp Dan
Subject: RE: Kohler Company - Lead Contaminated Soil
Attachments: 20161005_103233.jpg

Categories: WORK - Important

Hi Richard. See responses below.

Dan

From: Joslin, Richard R - DNR [mailto:Richard.Joslin@wisconsin.gov]
Sent: Tuesday, October 04, 2016 2:06 PM
To: Tresp Dan <DANIEL.TRESP@kohler.com>
Subject: Kohler Company - Lead Contaminated Soil

Dan

Thanks for taking the time to discuss the Notification For Hazardous Substance Discharge (Form 4400-225) that was submitted by you, on behalf of Kohler Company, with regard to the lead contaminated soil. If it would not be too much trouble could you answer a few more questions that I came up with? Again I want to understand the facts before we move forward.

- If we had to distinguish between waste or soil what would you call this material? If you pick it up (with a glove on) is the majority of the material soil or waste material. Would it be possible to get a few photos? It is soil. See attached photo.

- The analytical results submitted with the above-referenced form was for TCLP metals. Are there any other results associated with this material? (i.e., total metals, VOCs, PAHs, etc.) Not at this time. We expect additional test results next week.

- Can you give me a brief description of how this was discovered, work activities, the status of things, etc.? I know we discussed this a little but I just want to have my facts straight. Contamination was discovered while excavating a trench to upgrade the storm sewer system for the main parking lot. The storm sewer work is on hold until we have test results and receive disposal approval. All excavated soil has been covered with tarps.

- What do you want to do moving forward? If I remember right when we talked you mentioned only removing what was needed for the work that was going on and not doing a complete removal of this material. Again just want to make sure I'm on the same page as you. An action plan will be developed after further test results are in.

Thanks Dan for your help with this.

We are committed to service excellence.
Visit our survey at http://dnr.wi.gov/customersurvey to evaluate how I did.

Richard R. Joslin
Hydrogeologist – Remediation & Redevelopment Bureau
Wisconsin Department of Natural Resources
2984 Shawano Avenue, Green Bay WI 54313-6727
Phone: (920) 662-5165
Cell Phone: (920) 360-4291
Richard.Joslin@Wisconsin.gov


dnr.wi.gov


Joslin, Richard R - DNR

From: Danelski, Denise D - DNR on behalf of DNR RR NER
Sent: Friday, September 30, 2016 3:57 PM
To: Joslin, Richard R - DNR
Subject: FW: Rick - Notification of hazardous substance discharge
Attachments: Scanned from a Xerox multifunction device.pdf

Categories: WORK - Important

Hi Rick,

A release for your decision.

Thanks,

We are committed to service excellence.
Visit our survey at http://dnr.wi.gov/customersurvey to evaluate how I did.

Denise D. Danelski
Phone: (920) 662-5494
denise.danelski@wisconsin.gov

From: Tresp Dan [mailto:DANIEL.TRESP@kohler.com]
Sent: Friday, September 30, 2016 3:09 PM
To: DNR RR NER
Cc: Tresp Dan; Plass Jeff; Hafele Myron
Subject: Rick - Notification of hazardous substance discharge

To Whom it May Concern:

The attached Notification for Hazardous Substance Discharge (Form 4400-225) is provided to report historic contamination that was discovered at Kohler Co.. Included with the notification form is an aerial diagram showing the area of excavation and C&M Lab Report 16090193 which shows excavated soil is hazardous for lead.

Waste soil generated will be profiled for disposal through Veolia Environmental Services.

Please call me at the number below if you have any questions or need additional information.

Thank you.

Dan Tresp
Kohler Co.
dan.tresp@kohler.com
Ph: (920) 457-4441 (Ext. 77210)
Fx: (920) 459-1682

Give Thought. Take Action.
KOHLER. Stewardship

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

Notification For Hazardous Substance Discharge (Non-Emergency Only)

Emergency Discharges / Spills should be reported via the 24-Hour Hotline: 1-800-943-0003

Notice: Hazardous substance discharges must be reported immediately according to s. 292.11 Wis. Stats. Non-emergency hazardous substance discharges may be reported by telefaxing or e-mailing a completed report to the Department, or calling or visiting a Department office in person. If you choose to notify the Department by telefax or by email, you should use this form to be sure that all necessary information is included. However, use of this form is not mandatory. Under s. 292.99, Wis. Stats., the penalty for violating the reporting requirements of ch. 292 Wis. Stats., shall be no less than $10 nor more than $5000 for each violation. Each day of continued violation is a separate offense. It is not the Department's intention to use any personally identifiable information from this form for any purpose other than program administration. However, information submitted on this form may also be made available to requesters under Wisconsin's Open Records Law (ss. 19.31 – 19.39, Wis. Stats.).

Confirmatory laboratory data should be included with this form, to assist the DNR in processing this Hazardous Substance Release Notification.

Complete this form. **TYPE or PRINT LEGIBLY.** NOTIFY appropriate DNR region (see next page) **IMMEDIATELY** upon discovery of a potential release from **(check one)**:

- ☐ Underground Petroleum Storage Tank System (additional information may be required for Item 6 below)
- ☐ Aboveground Petroleum Storage Tank System
- ☐ Dry Cleaner Facility
- ☒ Other - Describe: discovery of historic contamination

ATTN DNR: **R & R Program Associate** Date DNR Notified: 09/30/2016

1. Discharge Reported By

Name	Firm	Phone No. (include area code)
Dan Tresp	Kohler Company	(920) 457-4441

Mailing Address	Email Address
444 Highland Drive Kohler, WI 53044	dan.tresp@kohler.com

2. Site Information

Name of site at which discharge occurred. Include local name of site/business, not responsible party name, unless a residence/vacant property. Kohler Co.

Location: Include street address, not PO Box. If no street address, describe as precisely as possible, i.e., 1/4 mile NW of CTHs 60 & 123 on E side of CTH 60. 444 Highland Drive

Municipality: (City, Village, Township) Specify municipality in which the site is located, not mailing address/city.
Kohler, WI

County:	Legal Description:	WTM:
Sheboygan	___ 1/4 ___ 1/4 Sec ___ Tn ___ Range ___ ○ E ○ W	X _____ Y _____

3. Responsible Party (RP) and/or RP Representative

Responsible Party Name: Business or owner name that is responsible for cleanup. If more than one, list all. Attach additional pages as necessary.

Kohler Co.

☐ Reported in compliance with s. 292.11(2), Wis. Stats., by a local government exempt from liability under s. 292.11(9)(e), Wis. Stats. For more information see http://dnr.wi.gov/topic/Brownfields/Liability.html

Contact Person Name (if different)	Phone Number	Email Address
SAME		

Mailing Address	City	State	ZIP Code

Property owner if Different From RP: Business or owner name that is responsible for cleanup. If more than one, list all. Attach additional pages as necessary. SAME

Contact Person Name (if different)	Phone Number	Email Address

Mailing Address	City	State	ZIP Code

(continued)

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

Notification For Hazardous Substance Discharge (Non-Emergency Only)

4. Hazardous Substance Information

Identify hazardous substance discharged (check all that apply):

- ☐ VOC's
- ☐ PAH's
- ☐ Metals (specify): _____
- ☐ Arsenic
- ☐ Chromium
- ☐ Cyanide
- ☒ Lead
- ☐ PCB's
- ☐ Diesel
- ☐ Fuel Oil
- ☐ Gasoline
- ☐ Hydraulic Oil
- ☐ Jet Fuel
- ☐ Mineral Oil
- ☐ Waste Oil
- ☐ Petroleum-Unknown Type
- ☐ PERC (Dry Cleaners)
- ☐ RCRA Hazardous Waste
- ☐ Leachate
- ☐ Fertilizer
- ☐ Pesticide/Herbicide/Insecticide(s)
- ☐ Other (specify): _____
- ☐ Unknown

5. Impacts to the Environment Information

Enter "K" for known/confirmed or "P" for potential for all that apply.

- __ Air Contamination
- __ Co-Contamination (Petroleum & Non-Petroleum)
- __ Contamination Within 1 Meter of Bedrock
- __ Contaminated Private Well
- __ Contaminated Public Well
- __ Contamination in Fractured Bedrock
- __ Sanitary Sewer Contamination
- __ Contamination in Right of Way
- __ Fire Explosion Threat
- __ Free Product
- __ Groundwater Contamination
- __ Off-Site Contamination
- __ Other (specify): _____
- K Soil Contamination
- __ Storm Sewer
- __ Surface Water Contamination
- __ Within 100 ft of Private Well
- __ Within 1000 ft of Public Well

Contamination was discovered as a result of:

☐ Tank closure assessment Date _____

☐ Site assessment Date _____

☒ Other - Describe: Storm sewer line replacement Date 09/30/2016

Lab results: ☐ Lab results will be faxed upon receipt ☒ Lab results are attached

Additional Comments: Include a brief description of immediate actions taken to halt the release and contain or cleanup hazardous substances that have been discharged.

Discolored soil was observed during sewer line excavation work. Excavated soil was isolated and covered with plastic sheeting. Soil TCLP test results are attached. Area of excavation is shown on the attached aerial diagram.

6. Federal Energy Act Requirements (Section 9002(d) of the Solid Waste Disposal Act (SWDA))

For all confirmed releases from UST's occurring after 9/30/2007 please provide the following information:

☒ Does not apply.

Source

- ☐ Tank
- ☐ Piping
- ☐ Dispenser
- ☐ Submersible Turbine Pump
- ☐ Delivery Problem
- ☐ Other (specify): _____

Cause

- ☐ Spill
- ☐ Overfill
- ☐ Corrosion
- ☐ Physical or Mechanical Damage
- ☐ Installation Problem
- ☐ Other (does not fit any of above)
- ☐ Unknown

Contact information to report non-emergency releases in DNR's five regions are as follows:

Northeast Region (FAX: 920-662-5197); Attention -- R&R Program Associate: DNRRRNER@wisconsin.gov

Brown, Calumet, Door, Fond du Lac **(except City of Waupun - see South Central Region)**, Green Lake, Kewaunee, Manitowoc, Marinette, Marquette, Menominee, Oconto, Outagamie, Shawano, Sheboygan, Waupaca, Waushara, Winnebago counties

Northern Region (FAX: 715-623-6773); Attention -- R&R Program Associate: DNRRRNOR@wisconsin.gov

Ashland, Barron, Bayfield, Burnett, Douglas, Forest, Florence, Iron, Langlade, Lincoln, Oneida, Polk, Price, Rusk, Sawyer, Taylor, Vilas, Washburn counties

South Central Region (FAX: 608-273-5610); Attention -- R&R Program Associate: DNRRRSCR@wisconsin.gov

Columbia, Dane, Dodge, Fond du Lac **(City of Waupun only)**, Grant, Green, Iowa, Jefferson, Lafayette, Richland, Rock, Sauk, Walworth counties

Southeast Region (FAX: 414-263-8550); Attention -- R&R Program Associate: DNRRRSER@wisconsin.gov

Kenosha, Milwaukee, Ozaukee, Racine, Washington, Waukesha counties

West Central Region (FAX: 715-839-6076); Attention -- R&R Program Associate: DNRRRWCR@wisconsin.gov

Adams, Buffalo, Chippewa, Clark, Crawford, Dunn, Eau Claire, Jackson, Juneau, LaCrosse, Marathon, Monroe, Pepin, Pierce, Portage, St. Croix, Trempealeau, Vernon, Wood counties


Storm sewer line
excavation area

CHEMICAL AND METALLURGICAL LABORATORY REPORT - KOHLER CO.

Report No.: 16090193
Date Issued: 9-30-16

REPORT TITLE: TCLP Metal Concentrations in Storm Sewer Excavation Soil

OBJECTIVE

Determine if a soil sample is TCLP hazardous. Also, determine the TCLP copper, nickel, and zinc on this sample. The sample was generated from the Kohler Co. Main Parking lot storm sewer excavation. Dan Tresp collected the sample on 9-27-16.

CONCLUSIONS

- The soil sample is TCLP hazardous for lead.

EXPERIMENTAL PROCEDURE

The sample was analyzed by following C&M Laboratory procedures 728A – Toxicity Characteristic Leaching Procedure, and 734 – Elemental Analysis by ICP Atomic Emission Spectroscopy. The TCLP extraction was completed on 9-28-16.

RESULTS

The results relate only to the items tested.

Analyte	Concentration (mg/L)	Analysis Date	RCRA Limits (mg/L)
TCLP Arsenic	0.007	9/29/16	5.0
TCLP Barium	2.80	9/29/16	100
TCLP Cadmium	0.078	9/29/16	1.0
TCLP Chromium	0.004	9/29/16	5.0
TCLP Copper	72.8	9/29/16	-----
TCLP Lead	8.54	9/29/16	5.0
TCLP Mercury	0.0015	9/30/16	0.02
TCLP Nickel	0.380	9/29/16	-----
TCLP Selenium	<0.0079	9/30/16	1.0
TCLP Silver	<0.0015	9/29/16	5.0
TCLP Zinc	48.4	9/29/16	-----

Authored by: Lisa Escher, Joan Deno **Reviewed by:** Mary Jo Grabner

Distribution: Dan Tresp File

KOHLER

CHAIN OF CUSTODY RECORD

Chemical & Metallurgical Laboratory
444 Highland Drive, MS 205
Kohler, WI 53044
(920) 457-4441 Fax: (920) 803-4882

Report Number:	16090193
Report to:	Dan Tresp
Account Charged:	

Is this testing being conducted for regulatory monitoring? (Yes) No

If so, which regulations apply?

Drinking Water	
RCRA	X
NPDES	
Other:	

The Lab has permission to dispose of remaining sample? Yes No

Sampled By:
(Print Name) Dan Tresp
(Print Name)
(Print Name)

End:
Start:

Field Interf. Check
Interf. Check Result

ANALYSES: Preserv. Verified; TCLP Metals (8 RCRA plus Cu, Ni, Zn)

Field Preserved: Comp, Grab, Matrix, 4°C, HCl, NaOH, HNO3, H2SO4, Other

Date	Time	Sample Description	#/Container Type (P=Plastic G=Glass)	Preserv. Verified	TCLP Metals (8 RCRA plus Cu, Ni, Zn)	Comments
9/28/16	1330	Storm Sewer				
		Excavation Soil	Grab: 1/P		X	Generated from main parking lot storm sewer excavation

Relinquished by: Dan Tresp Date: 9/27/16 Time: am / pm

C&M LAB USE ONLY

Sample Acceptance:

	Y	N		Y	N		Y	N
Hold time can be met?	X		Sample vol. sufficient?	X		Received on ice?		
Bottles appropriate?	X		VOCs free of headspace?			Drinking water temp on receipt: °C / °F		
Bottles intact?	X		Field filtered?					

Received for Lab by: [signature] Date: 9-27-16 Time: 1:45 am / (pm)