



**Gannett Fleming**

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May 25, 2017  
File #34283.000

Mr. Howard Caine – SR-6J  
Remedial Project Manager  
Waste Management Division  
USEPA Region V  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

Re: Update on the East Disposal Site, Drainage Ditch #3, and Loading Dock Area  
National Presto Industries, Inc. Eau Claire, Wisconsin  
USEPA CERCLIS ID WID 006196174  
WDNR BRRTS 02-09-000267 and FID 609038320

Dear Howard:

On behalf of National Presto Industries, Inc. (NPI), Gannett Fleming, Inc. (GF) is submitting an update on the status of the East Disposal Site (EDS), Drainage Ditch #3 (DD3), and Loading Dock Area (LDA) at the NPI Superfund site in Eau Claire, Wisconsin. In addition, sections with pertinent background information and our findings and conclusions regarding NPI's continuing obligations at all three areas, based on an interpretation of the historical data as it relates to current Wisconsin Department of Natural Resource (WDNR) closure standards, are presented. During the annual meeting on October 19, 2016 at the NPI site in Eau Claire, it was agreed that GF would prepare and submit an update on NPI's behalf to you and Mae Willkom at the WDNR.

**Pertinent Background Information on the EDS, DD3, and the LDA**

Figure 1 is a plan view of the site that shows the locations of the three areas, NPI's main building, and historical monitoring well network for reference. All three areas are located in Chippewa County on Parcel ID #22809-3440-00020000 (aka City of Eau Claire Parcel #16-0429), which is zoned industrial. Appendix A includes an official zoning map from the City of Eau Claire for the file. As summarized below, work was conducted to:

- Excavate impacted soil and remove buried drums/barrels from the EDS and DD3 in June 1998; the work was performed in conjunction with other Superfund remedial actions at NPI.

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- Excavate impacted soil from the LDA in July, August, and December 2001. The impacted soil was encountered during subgrade preparation activities prior to installation of a new asphalt access road and apron for the LDA at the south end of the main building.

Following completion of that excavation work, GF collected confirmation soil samples to document subsurface conditions at the EDS, DD3, and the LDA. This report provides brief descriptions of the remedial actions in all three areas, figures documenting the sampling locations, and tables summarizing the field screening and laboratory analytical results. For comparison, the tables also include:

- NR 720 generic residual contaminant level (RCL) concentrations from WDNR's online Remediation and Redevelopment (RR) Program Soil RCL Excel workbook updated March 2017.
- Industrial multiple contaminant cumulative cancer risk (CCR) and hazard index (HI) levels, if applicable (for samples within 4 feet of ground surface and based on detected concentrations only). Thresholds are 1E-05 for CCR and 1.0 for HI per NR 720.12(1)(b).

Documents by GF (fka Eder Associates) on file with the agencies that provide additional details include our:

- September 23, 1998, *Results of Soil Excavation and Solids Removal* report to Mike Bellot at the USEPA;
- February 19, 1999, *Follow-up Sampling Results* report for DD3 to Mike;
- October 6, 1999, *No Further Remedial Action Request* report for the EDS to George Mickelson at the WDNR;
- August 21, 2000, *No Further Remedial Action Request* report for DD3 to George;
- April 8, 2009, *No Further Remedial Action Request* report for the LDA to Eileen Kramer at the WDNR; and
- July 8, 2009, *Supplemental Sampling Data* report for the LDA to Mae Willkom at the WDNR.

Supplemental reference information follows.

- Native soils in all three areas consist of sand and gravel overlying sandstone bedrock.

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- The excavations were backfilled with clean soil in 1998 (the EDS and DD3) and 2001 (the LDA) to restore the property and eliminate the risk of direct contact with residual contamination, following review of the confirmation soil sampling data and agency approval.
- Between October 1998 and June 2000, the depth to groundwater in:
  - MW-72 and MW-73, at the EDS, ranged from approximately 38 to 41 feet below ground surface (bgs).
  - MW-11A and PW-1, at DD3, ranged from approximately 70 to 73 feet bgs.

### **Update on the East Disposal Site**

In June 1998, approximately 2,200 cubic yards of impacted soil and eight buried drums were removed from the EDS and transported to the Melby Road Disposal Site (MRDS) for incorporation under the cap that was being installed at the time. Following the excavation, GF collected confirmation soil samples from the base (estimated average depth of approximately 10 feet bgs) and sidewalls of the excavation and submitted them for laboratory analysis of volatile organic compounds (VOCs). Select samples were also analyzed for gasoline range organics (GRO) and polychlorinated biphenyls (PCBs). In September 1998, four borings (B-1 thru B-4) were drilled adjacent to and through the area that had been excavated. Soil samples from two depths in each borehole were analyzed for VOCs in order to further define the vertical extent of residual contamination. Figure 2 shows the approximate limits of the excavation and the sampling locations. Table 1 summarizes the laboratory analytical results, with concentrations in milligrams per kilogram (mg/kg) on a dry weight basis. As shown in Table 1:

- Most samples (i.e., 21 of 30) were also field screened for VOCs with a portable, hand-held flame-ionization detector (FID). The FID readings are in parts per million, volume (ppmv).
- All samples were collected >4 feet bgs.

In response to our October 1999 No Further Action request for the EDS to the WDNR, George Mickelson emailed comments to the USEPA (and copied GF) on October 15, 1999. The email identified three compounds/samples at the EDS that “remain an issue,” as described below and summarized in Table 1.

1. PCBs/Aroclor 1260 at up to 5.05 mg/kg in EDS-2B15. In comparison, current Chapter NR 720, Wisconsin Administrative Code, generic residual contaminant level (RCL) standards for Aroclor 1260 are 0.0094 mg/kg for the soil to groundwater pathway, 0.216 mg/kg for non-industrial/residential direct contact, and 0.731 mg/kg for industrial direct contact. The Aroclor

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1260 concentrations of 5.05 mg/kg in EDS-2B15 and 3.24 mg/kg in EDS-4B are above all three NR 720 RCLs. However, direct contact RCLs are not applicable to those two particular soil zones, given that both samples were collected >4 feet bgs. In addition, George's email indicates that "the PCB results of 5.05 mg/kg met the federal standards as of the date of the ROD."

2. Trichloroethylene (TCE) at up to 0.256 mg/kg in EDS-5E, compared to current NR 720 RCLs of 0.0036 mg/kg for the soil to groundwater pathway, 1.26 mg/kg for residential direct contact, and 8.81 mg/kg for industrial direct contact.
3. 1,2,4-trimethylbenzene (TMB) at up to 25.5 mg/kg (and 3.73 mg/kg of 1,3,5-TMB for a TMBs combined concentration of 29.23 mg/kg) in HA-1, compared to current NR 720 RCLs of 1.3821 mg/kg for the TMBs combined soil to groundwater pathway, 89.8 mg/kg 1,2,4-TMB for residential direct contact, and 219 mg/kg 1,2,4-TMB for industrial direct contact. Note that:
  - o Individually, 1,2,4-TMB and 1,3,5-TMB do not have NR 720 soil to groundwater pathway RCLs.
  - o TMBs combined do not have an NR 720 RCL for residential or industrial direct contact.

Historical monitoring results documented that groundwater quality improved over time at the EDS. Consequently, the WDNR West Central Region closure committee "determined that if the EPA determines no additional soil remediation needs to be performed, DNR will not object. DNR recommends that an appropriate deed instrument be used due to the remaining PCB (Aroclor 1260), TCE, and TMB contamination in soil. Also, for this reason, DNR recommends that a deed restriction be used to maintain non-residential use on this part of the property." (Page 3, Paragraph 1, Mickelson, October 1999). Appendix B includes a copy of George's October 1999 email for reference.

### **Update on Drainage Ditch #3**

In June 1998, approximately 4,100 cubic yards of soil affected by waste forge compound were excavated from DD3 and transported to the MRDS for incorporation under the cap that was being installed at the time. Following the excavation, confirmation soil samples were collected from the base (ranging from <4 to >10 feet bgs) and sidewalls of the excavation and submitted for laboratory analysis of cadmium, copper, lead, zinc, and VOCs. Four samples were also analyzed for PCBs. Figure 3 shows the approximate limits of the excavation and the sampling locations. Table 2 summarizes the laboratory analytical results and conservatively assumes that all samples were collected within 4 feet of the ground surface. As shown in Table 2, all but 2 of the 41 soil sample locations were also field screened for VOCs with a portable FID.

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In response to our August 2000 No Further Action request for DD3 to the WDNR, George emailed comments to GF (and copied the USEPA) on November 3, 2000. On Page 2, in Paragraph 2, the email states: "...it was the determination of the Closure Committee that if the EPA chooses to require no further action at Drainage Ditch Number 3, the DNR will concur with the decision. It also was the decision of the Closure Committee that if this was a non-superfund site, a closure letter would be sent that would note that there is residual lead contamination in soil that exceeds 50 mg/kg." Appendix B includes a copy of George's November 2000 email for reference.

As summarized in Table 2, confirmation soil sample locations with residual lead concentrations above 50 mg/kg (the generic NR 720 RCL for lead in November 2000) include DD3-0E (63.6 mg/kg), DD3-0W (66.3 mg/kg), and DD200-B (535 mg/kg). In comparison, current NR 720 generic RCLs for lead are 27 mg/kg for the soil to groundwater pathway, 400 mg/kg for residential direct contact, and 800 mg/kg for industrial direct contact.

### **Update on the Loading Dock Area**

In July 2001, during subgrade preparation activities prior to installation of a new asphalt access road and apron for the LDA, soils impacted with waste forge compound were encountered, excavated, and stockpiled nearby. The July 2001 excavation was approximately 100 feet long, up to 50 feet wide, and 3 feet deep. In August 2001, the original excavation was deepened by 1 foot and enlarged approximately 80 feet to the east and up to 50 feet to the south; the excavated soil was added to existing stockpiles. In December 2001, the USEPA and WDNR concurred that the excavated soils were not hazardous waste and approved their disposal in a Subtitle D landfill (Waste Management's Timberline Trail in Rusk County). Additional excavation to the extent practicable occurred at that time, and all impacted soil was taken to Timberline Trail landfill for disposal. The total amount of soil excavated and landfilled was approximately 1,900 cubic yards.

Confirmation soil samples were collected from the base of the August 2001 excavation (B-1A through B-4A), the base and sidewalls of the December 2001 excavation (EB-1 through EB-6 and SS-1 through SS-9, respectively), and material beneath the two former soil stockpile areas (PB-1 through PB-7) and submitted for laboratory analysis of select metals, VOCs, and polycyclic aromatic hydrocarbons (PAHs). Figure 4 shows the approximate limits of the excavations and the sampling locations. Tables 3 and 4 include summaries of the laboratory analytical results for the August 2001 and December 2001 samples, respectively. Note that about 50 feet south-southeast of MW-10A, a relatively small area of residual impacted material (approximately 65 feet long and up

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to 10 feet wide, shown as a stippled area with closely spaced dots on Figure 4) was identified adjacent to the south side of the existing access road.

In response to our April 2009 No Further Action request for the LDA to the WDNR, Mae Willkom emailed comments to GF (and copied the USEPA) on June 4, 2009; Appendix B includes a copy of her June 2009 email for reference. Based on Mae's comments:

- NPI had the following supplemental work conducted.
  - On June 10, 2009, soil boring SB-1 was drilled and sampled for PAHs and select VOCs north of the access road to confirm that PAH concentrations exceeding NR 720 direct contact RCLs do not extend beyond it, as requested by Mae. Figure 4 shows the location of SB-1, and Page 6 of Table 4 includes the June 2009 laboratory analytical results.
  - In November 2016, as shown on Figure 4, asphalt pavement was installed over the sliver of residual impacted soil because select PAHs in SS-1 (benzo[a]anthracene, benzo[a]pyrene, and benzo[b]fluoranthene) and SS-3 (benzo[a]anthracene and benzo[b]fluoranthene) exceeded NR 720 industrial direct contact RCLs at that time. In March 2017, however, direct contact RCLs for most PAHs increased. Consequently, PAH concentrations in SS-1 and SS-3 are now below industrial direct contact RCLs.
- NPI confirms that the December 2001 excavation base sample locations (EB-3 and EB-5) are at least 4 feet below current grade and commits to maintaining a 2-foot soil cover (at a minimum) over EB-3 and EB-5 and industrial land use/zoning in this area of the site, as referenced in Mae's June 2009 email. Based on WDNR guidance documents, Appendix C provides a draft cap maintenance plan for review. It includes two photographs of the cap for reference.

In addition, the NR 720 RCLs have changed since June 2009. Based on current RCLs, as summarized in Table 4, and industrial zoning classification, all LDA soil sample locations with elevated PAH concentrations meet the 2-foot clean cover minimum.

## **Findings and Conclusions**

Following remedial actions completed at the EDS and DD3 in June 1998 and the LDA in December 2001, analytical results from confirmation soil samples and groundwater monitoring document that:

- The estimated extent of residual impacted soil is defined in all three areas.

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- There are no NR 720 industrial direct contact exceedances for contaminants of concern within 4 feet of the current ground surface at either the EDS or DD3. There is one LDA soil sample location with NR 720 industrial direct contact RCL exceedances at EB-3. However, EB-3 is a base sample location collected at 3.5-4 feet bgs. Consequently, it meets the 2-foot clean cover minimum.
- The mass of residual soil contamination in all three areas is relatively small and no longer impacting groundwater quality.

Consequently, NPI proposes to:

- Implement whatever institutional controls/continuing obligations that the agencies deem appropriate to maintain industrial land use/zoning at the EDS, DD3, and/or the LDA, based on existing data.
- Complete a final cap maintenance plan for the LDA, because of the NR 720 industrial direct contact RCL exceedances at EB-3, based on the draft document presented in Appendix C and input from both agencies.
- Submit the required information to get one or more of the areas placed on the WDNR's GIS registry for soil, if necessary.

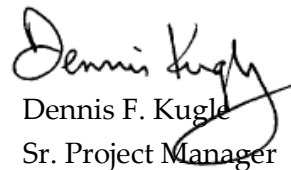
Please provide NPI with direction on how to proceed, and feel free to contact Cliff (608-836-1500 ext. 6722) if you have any questions or need additional information.

Sincerely,

GANNETT FLEMING, INC.



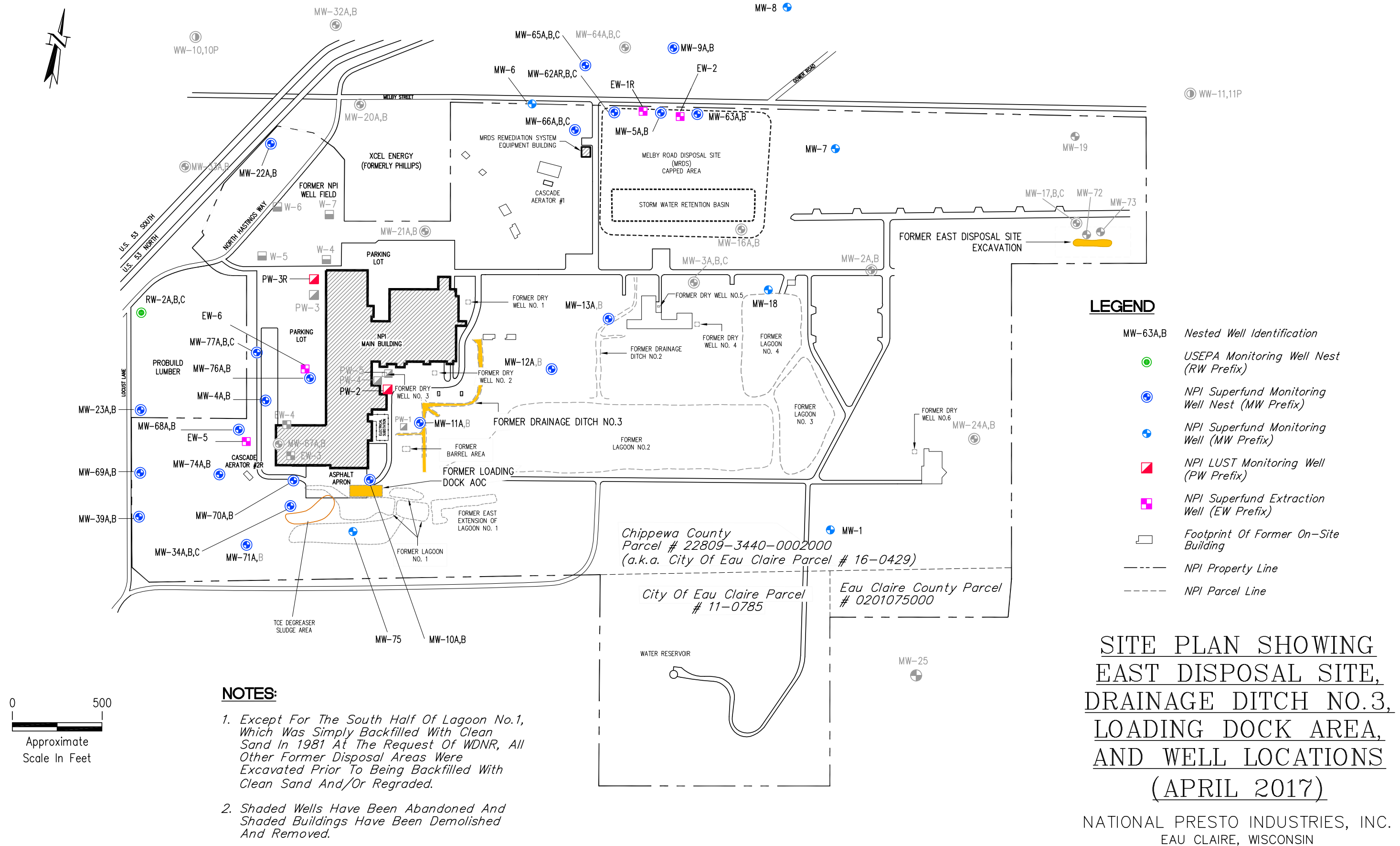
Clifford C. Wright, P.E., P.G.  
Project Engineer



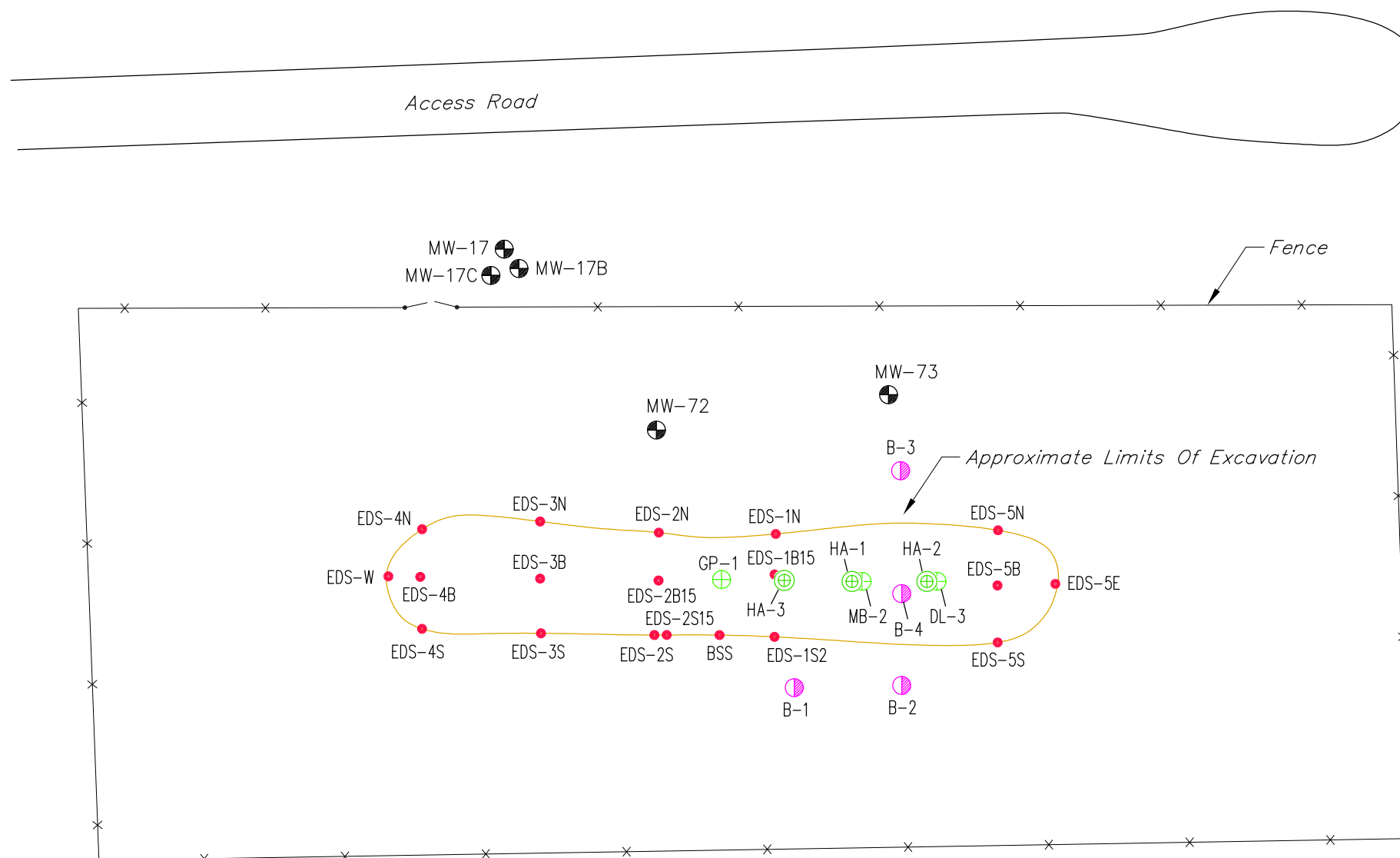
Dennis F. Kugle  
Sr. Project Manager

CCW/jec/Enc.

Electronic cc: Mae Willkom (WDNR/Eau Claire)  
Derrick Paul (NPI)  
Dennis Kugle (GF)





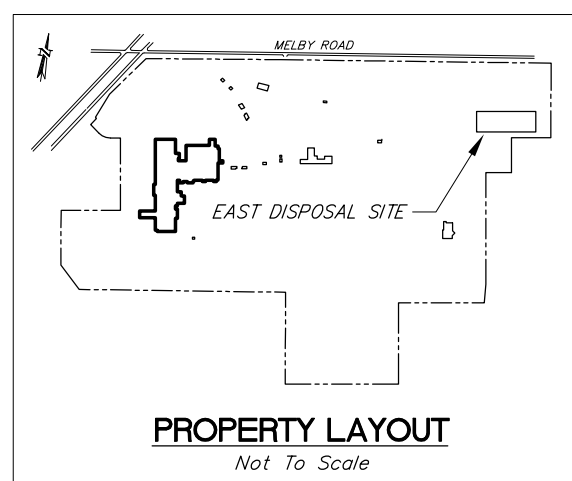


**LEGEND**

- Hand Auger Boring (Field-Screened And Submitted For Laboratory Analysis)
- Hand Auger Boring by USEPA/WDNR (Field Screened Only)
- Grab Sample From Sidewall Or Base Of Excavation (Field Screened And Submitted to Laboratory For Analysis)
- Borehole Location
- Monitoring Well

**NOTES**

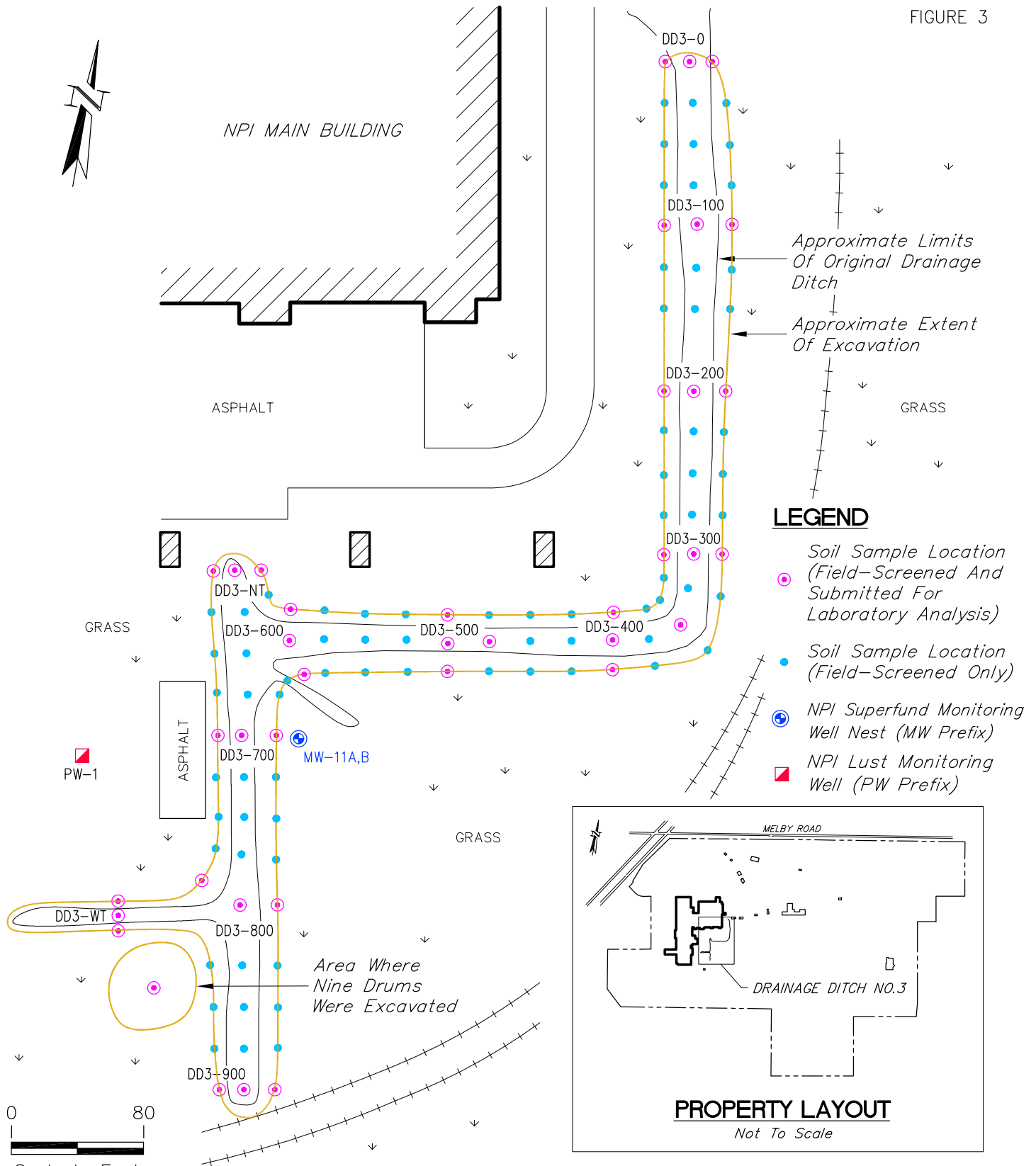
1. Field Screening Data From Hand Auger Borings DL-3, GP-1, And MB-2 By USEPA, Weston, And WDNR Staff Not Included in Table 1.
2. Table Included With This Figure Provides Installation And Abandonment Dates For MW-17, MW-17B, MW-17C, MW-72 And MW-73.



Well ID	Installation Date	Abandonment Date
MW-17	12/3/1986	11/23/2011
MW-17B	12/4/1986	11/23/2011
MW-17C	5/20/1986	11/23/2011
MW-72	9/9/1998	11/23/2011
MW-73	9/9/1998	11/23/2011

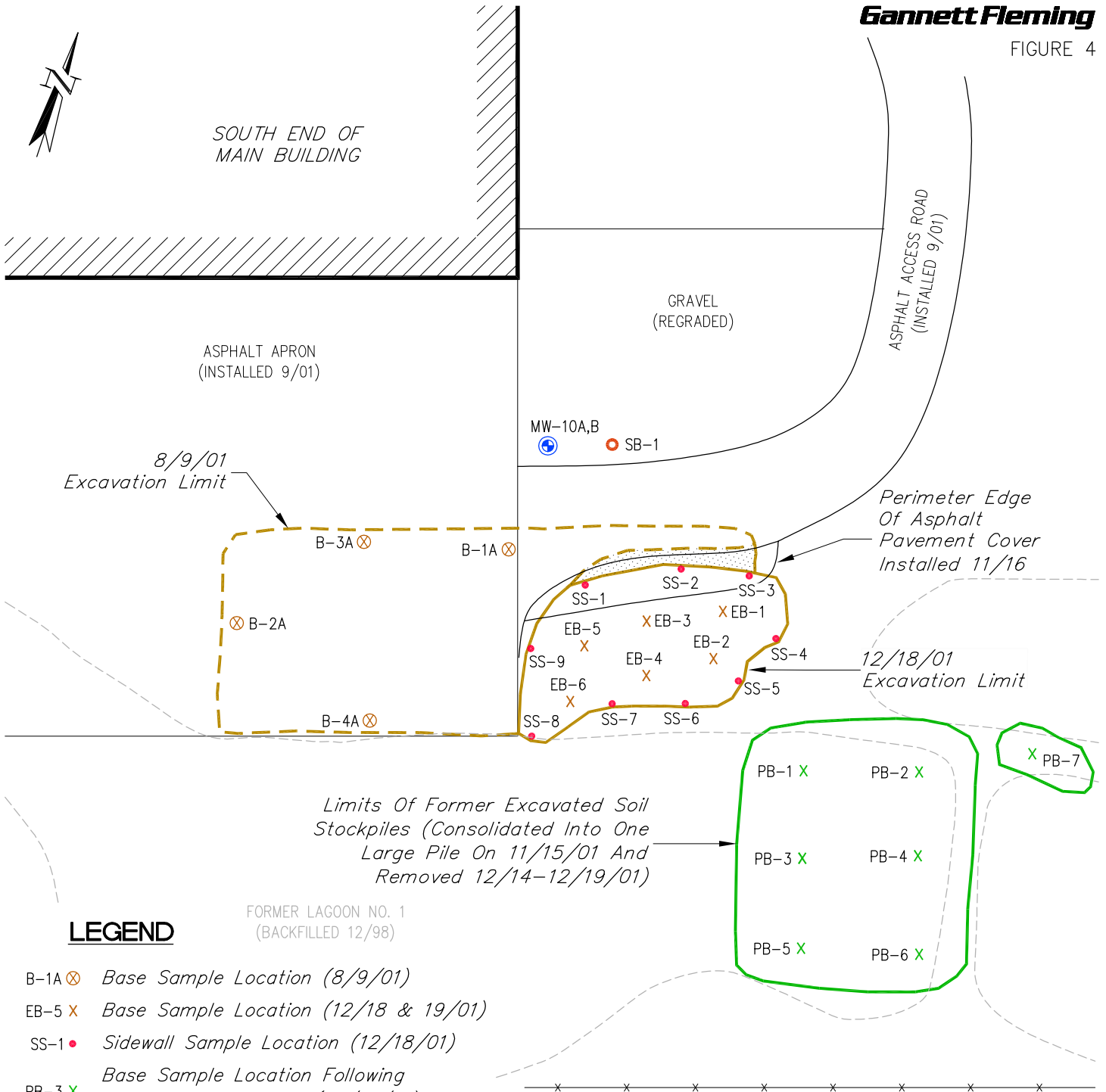


**CONFIRMATION SOIL  
SAMPLE LOCATIONS AT  
EAST DISPOSAL SITE  
(JUNE-SEPTEMBER 1998)  
NATIONAL PRESTO INDUSTRIES, INC.  
EAU CLAIRE, WISCONSIN**



**DRAINAGE DITCH NO. 3  
CONFIRMATION SOIL SAMPLE LOCATIONS  
(JUNE 1998)**

NATIONAL PRESTO INDUSTRIES, INC.  
EAU CLAIRE, WISCONSIN



**LEGEND**

- B-1A ⊗ Base Sample Location (8/9/01)
- EB-5 ⊗ Base Sample Location (12/18 & 19/01)
- SS-1 • Sidewall Sample Location (12/18/01)
- PB-3 ⊗ Base Sample Location Following Removal Of Stockpile (12/19/01)
- SB-1 ⊙ Geoprobe Soil Boring (6/10/09)
- Estimated Extent Of Residual Material Left In Place
- ⊕ NPI Superfund Monitoring Well Nest (MW Prefix)

FORMER LAGOON NO. 1  
(BACKFILLED 12/98)



**FINAL EXCAVATION LIMITS,  
RESIDUAL SOIL SAMPLING  
LOCATIONS, AND ASPHALT  
PAVEMENT COVER  
(LOADING DOCK AREA)**

NATIONAL PRESTO INDUSTRIES, INC.  
EAU CLAIRE, WISCONSIN

NATIONAL PRESTO INDUSTRIES, INC.  
EAU CLAIRE, WISCONSIN

TABLE 1

EAST DISPOSAL SITE CONFIRMATION SOIL SAMPLE FIELD SCREENING DATA (ppmv) AND LABORATORY ANALYTICAL RESULTS (mg/kg)

Description-Sample Location/ID	B-1	B-1	B-2	B-2	B-3	B-3	B-4	B-4	BSS	NR 720 RCL (mg/kg)			
	Sample Depth (ft bgs)	14-16	29-31	14-16	24-26	14-16	24-26	11-13	24-26	>4	Soil to	Non-Industrial	Industrial
Sample Date	9/8/98	9/8/98	9/8/98	9/8/98	9/8/98	9/8/98	9/8/98	9/8/98	9/8/98	7/1/98	Groundwater	Direct	Direct
FID (ppmv)	nm	nm	nm	nm	nm	nm	nm	nm	nm	10	Pathway	Contact	Contact
GRO (mg/kg)	na	na	na	na	na	na	na	na	na	6.76			
Detected volatile organic compounds (VOCs)													
n-Butylbenzene	<0.021	<0.023	<0.021	<0.021	<0.022	<0.022	<0.021	<0.022	<0.024	NS	108	108	
sec-Butylbenzene	<0.021	<0.023	<0.021	<0.021	<0.022	<0.022	<0.021	<0.022	0.0485	NS	145	145	
tert-Butylbenzene	<0.021	<0.023	<0.021	<0.021	<0.022	<0.022	<0.021	<0.022	<0.024	NS	183	183	
Chloromethane	<0.021	<0.023	<0.021	<0.021	<0.022	<0.022	<0.021	<0.022	0.0386	0.0155	159	669	
1,4-Dichlorobenzene	<0.021	<0.023	<0.021	<0.021	<0.022	<0.022	<0.021	<0.022	0.0379	0.144	3.74	16.4	
cis-1,2-Dichloroethene	<0.021	<0.023	<0.021	<0.021	<0.022	<0.022	<0.021	<0.022	0.102	0.0412	156	2340	
p-Isopropyltoluene	<0.021	<0.023	<0.021	<0.021	<0.022	<0.022	<0.021	<0.022	<0.024	NS	162	162	
Methyl tert butyl ether	<0.021	<0.023	<0.021	<0.021	<0.022	<0.022	<0.021	<0.022	<0.024	0.027	63.8	282	
n-Propylbenzene	<0.021	<0.023	<0.021	<0.021	<0.022	<0.022	<0.021	<0.022	0.0608	NS	264	264	
1,2,4-Trichlorobenzene	<0.021	<0.023	<0.021	<0.021	<0.022	<0.022	<0.021	<0.022	<0.024	0.408	24	113	
Trichloroethylene	<0.021	<0.023	<0.021	<0.021	<0.022	<0.022	<0.021	<0.022	<0.024	0.0036	1.3	8.41	
Trichlorofluoromethane	<0.021	<0.023	<0.021	<0.021	<0.022	<0.022	<0.021	<0.022	<0.024	4.4775	1230	1230	
1,2,4-TMB	<0.021	<0.023	<0.021	<0.021	<0.022	<0.022	<0.021	<0.022	0.0628	NS	219	219	
1,3,5-TMB	<0.021	<0.023	<0.021	<0.021	<0.022	<0.022	<0.021	<0.022	0.0327	NS	182	182	
TMBs combined	<0.042	<0.046	<0.042	<0.042	<0.044	<0.044	<0.042	<0.044	0.0955	1.3821	NS	NS	
Xylenes	<0.021	<0.023	<0.021	<0.021	<0.022	<0.022	<0.021	<0.022	<0.048	3.96	260	260	
Detected polychlorinated biphenyls (PCBs)													
Aroclor 1260	na	na	na	na	na	na	na	na	<0.074	0.0094	0.243	1	

TABLE 1

EAST DISPOSAL SITE CONFIRMATION SOIL SAMPLE FIELD SCREENING DATA (ppmv) AND LABORATORY ANALYTICAL RESULTS (mg/kg)

Description/Sample ID	EDS-1B15	EDS-1N	EDS-1S2	EDS-2B15	EDS-2N	EDS-2S	EDS-2S15	EDS-3B	EDS-3N	EDS-3S	NR 720 RCL (mg/kg)			
	Sample Date	6/24/98	6/24/98	6/24/98	6/24/98	6/24/98	6/24/98	6/25/98	6/25/98	6/25/98	6/25/98	Soil to	Non-Industrial	Industrial
	FID (ppmv)	100	0.2	nm	0.6	0.2	1.6	>1000	0.4	0	0	Groundwater	Direct	Direct
GRO (mg/kg)	na	na	na	na	na	na	na	na	na	na	Pathway	Contact	Contact	
Detected volatile organic compounds (VOCs)														
n-Butylbenzene	1.50	0.0622	<0.025	<0.023	<0.027	<0.025	6.54	<0.025	<0.022	<0.024	NS	108	108	
sec-Butylbenzene	<0.46	<0.023	<0.025	<0.023	<0.027	<0.025	2.70	<0.025	<0.022	<0.024	NS	145	145	
tert-Butylbenzene	<0.46	<0.023	<0.025	<0.023	<0.027	<0.025	<2.08	<0.025	<0.022	<0.024	NS	183	183	
Chloromethane	<0.46	<0.023	<0.025	<0.023	<0.027	<0.025	<2.08	<0.025	<0.022	<0.024	0.0155	159	669	
1,4-Dichlorobenzene	<0.46	<0.023	<0.025	<0.023	<0.027	<0.025	<2.08	<0.025	<0.022	<0.024	0.144	3.74	16.4	
cis-1,2-Dichloroethene	<0.46	<0.023	<0.025	<0.023	<0.027	<0.025	<2.08	<0.025	<0.022	<0.024	0.0412	156	2340	
p-Isopropyltoluene	<0.46	<0.023	<0.025	<0.023	<0.027	<0.025	<2.08	<0.025	<0.022	<0.024	NS	162	162	
Methyl tert butyl ether	<0.46	<0.023	0.0284	0.0439	0.0437	0.0481	<2.08	0.0451	0.0493	0.0444	0.027	63.8	282	
n-Propylbenzene	0.718	0.0288	<0.025	<0.023	<0.027	<0.025	5.13	<0.025	<0.022	<0.024	NS	264	264	
1,2,4-Trichlorobenzene	<0.46	<0.023	<0.025	<0.023	<0.027	<0.025	3.14	<0.025	<0.022	<0.024	0.408	24	113	
Trichloroethylene	<0.46	<0.023	<0.025	<0.023	<0.027	0.0629	<2.08	<0.025	<0.022	<0.024	0.0036	1.3	8.41	
Trichlorofluoromethane	<0.46	0.0744	<0.025	<0.023	<0.027	<0.025	<2.08	0.0776	0.0254	0.0545	4.4775	1230	1230	
1,2,4-TMB	3.08	0.0657	<0.025	<0.023	<0.027	<0.025	13.6	<0.025	<0.022	<0.024	NS	219	219	
1,3,5-TMB	0.619	<0.023	<0.025	<0.023	<0.027	<0.025	5.67	<0.025	<0.022	<0.024	NS	182	182	
TMBs combined	3.699	<0.0887	<0.050	<0.046	<0.054	<0.050	19.27	<0.050	<0.044	<0.048	1.3821	NS	NS	
Xylenes	<0.92	<0.046	<0.050	<0.046	<0.054	<0.050	<4.16	<0.050	<0.044	<0.048	3.96	260	260	
Detected polychlorinated biphenyls (PCBs)														
Aroclor 1260	<0.074	na	na	5.05	<0.0083	na	na	na	na	0.0097	0.0094	0.243	1	

TABLE 1

EAST DISPOSAL SITE CONFIRMATION SOIL SAMPLE FIELD SCREENING DATA (ppmv) AND LABORATORY ANALYTICAL RESULTS (mg/kg)

Description/Sample ID	EDS-4B	EDS-4N	EDS-4S	EDS-W	EDS-5S	EDS-5E	EDS-5N	EDS-5B	HA-1	HA-2	HA-3	NR 720 RCL (mg/kg)			
	Sample Date	6/25/98	6/25/98	6/25/98	6/25/98	6/27/98	6/27/98	7/1/98	7/1/98	7/1/98	7/1/98	7/1/98	Soil to Groundwater Pathway	Non-Industrial Direct Contact	Industrial Direct Contact
FID (ppmv)	0.0	0.0	0.0	0.0	0.0	2	0	2	430	220	3				
GRO (mg/kg)	na	na	na	na	na	na	na	na	633	625	<5.2				
Detected volatile organic compounds (VOCs)															
n-Butylbenzene	<0.023	<0.023	<0.02	<0.023	<0.022	0.0214	<0.02	0.0210	7.24	11.8	<0.022	NS	108	108	
sec-Butylbenzene	<0.023	<0.023	<0.02	<0.023	<0.022	<0.021	<0.02	<0.021	2.60	5.89	<0.022	NS	145	145	
tert-Butylbenzene	<0.023	<0.023	<0.02	<0.023	<0.022	<0.021	<0.02	<0.021	<2.0	4.2	<0.022	NS	183	183	
Chloromethane	<0.023	<0.023	<0.02	<0.023	<0.022	<0.021	<i>0.0256</i>	<0.021	<i>3.51</i>	<1.1	<i>0.0388</i>	<i>0.0155</i>	159	669	
1,4-Dichlorobenzene	<0.023	<0.023	<0.02	<0.023	<0.022	<0.021	<0.02	<0.021	<2.0	<1.1	<0.022	<i>0.144</i>	3.74	16.4	
cis-1,2-Dichloroethene	<0.023	<0.023	<0.02	<0.023	<0.022	<0.021	<0.02	<0.021	<2.0	<1.1	<0.022	<i>0.0412</i>	156	2340	
p-Isopropyltoluene	<0.023	<0.023	<0.02	<0.023	<0.022	<0.021	<0.02	<0.021	<2.0	2.98	<0.022	NS	162	162	
Methyl tert butyl ether	<i>0.0313</i>	<i>0.0406</i>	<0.02	<i>0.0507</i>	<0.022	<0.021	<0.02	<0.021	<2.0	<1.1	<0.022	<i>0.027</i>	63.8	282	
n-Propylbenzene	<0.023	<0.023	<0.02	<0.023	<0.022	<0.021	<0.02	<0.021	2.49	4.58	<0.022	NS	264	264	
1,2,4-Trichlorobenzene	<0.023	<0.023	<0.02	<0.023	<0.022	<0.021	<0.02	<0.021	<2.0	<1.1	<0.022	<i>0.408</i>	24	113	
Trichloroethylene	<0.023	<0.023	<0.02	<0.023	<0.022	<i>0.256</i>	<0.02	<0.021	<2.0	<1.1	<0.022	<i>0.0036</i>	1.3	8.41	
Trichlorofluoromethane	0.100	0.0397	0.0344	<0.023	<0.022	0.0789	0.0256	0.0603	<2.0	<1.1	0.0546	<i>4.4775</i>	1230	1230	
1,2,4-TMB	<0.023	<0.023	<0.02	<0.023	<0.022	0.0294	<0.02	<0.021	25.5	11.9	<0.022	NS	219	219	
1,3,5-TMB	<0.023	<0.023	<0.02	<0.023	<0.022	<0.021	<0.02	<0.021	3.73	4.36	<0.022	NS	182	182	
TMBs combined	<0.046	<0.046	<0.04	<0.046	<0.044	<0.0504	<0.04	<0.042	<i>29.23</i>	<i>16.26</i>	<0.044	<i>1.3821</i>	NS	NS	
Xylenes	<0.046	<0.046	<0.04	<0.046	<0.022	<0.021	<0.04	<0.042	<4.0	<3.49	<0.044	<i>3.96</i>	260	260	
Detected polychlorinated biphenyls (PCBs)															
Aroclor 1260	<i>3.24</i>	na	na	na	na	<0.0074	<0.0074	<0.0074	<0.074	<0.074	<0.074	<i>0.0094</i>	0.243	1	

NOTES:

Concentrations and NR 720 RCLs are in units of milligrams per kilogram (mg/kg) on a dry-weight basis, equivalent to parts per million (ppm).

Only compounds detected in one or more samples are included in the table, and there are no NR 720 RCLs for gasoline range organics (GRO).

No results at or above an applicable NR 720 non-industrial or industrial direct contact RCL. In addition, multiple contaminant cumulative cancer risk and hazard index thresholds do not apply because all samples were collected >4 feet below ground surface.

Detected concentrations at or above an applicable NR 720 soil to groundwater pathway RCL are italicized.

NR 720 residual contaminant level (RCL) concentrations from WDNR's RR Program Soil RCL Excel workbook updated March 2017.

Samples B-2 (24-26), B-3 (14-16), B-4 (11-13), and B-4 (24-26) contained styrene at concentrations ranging from 0.024 to 0.041 mg/kg. Styrene was detected in the method blank, thus its presence was attributed to laboratory contamination.

Sample depths, where included, are in feet below ground surface (ft bgs) at the time of collection.

FID = Flame-ionization detector reading in parts per million, volume (ppmv).

na = Not analyzed.

nm = Not measured.

NS = No standard.

TMBs (combined) = Trimethylbenzenes (1,2,4- and 1,3,5- combined).

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TABLE 2

DRAINAGE DITCH #3 CONFIRMATION SOIL SAMPLE FIELD SCREENING DATA (ppmv) AND LABORATORY ANALYTICAL RESULTS (mg/kg)

Description/Sample ID	DD3-0B	DD3-0E	DD3-0W	DD3-100B	DD3-100E	DD3-100W	DD3-200B	DD3-200B2	DD3-200B3	NR 720 RCL (mg/kg)		
										Soil to Groundwater Pathway	Non-Industrial Direct Contact	Industrial Direct Contact
Sample Date	6/17/98	6/17/98	6/17/98	6/17/98	6/17/98	6/17/98	6/17/98	10/23/98	10/23/98			
Base/Sidewall	Base	Sidewall	Sidewall	Base	Sidewall	Sidewall	Base	Base	Base			
FID (ppmv)	0.2	0	0.1	0.4	0.2	0	0.4	nm	nm			
Detected metals												
Cadmium	0.698	0.809	3.0	0.259	0.305	<0.11	1.54	na	na	0.752	71.1	985
Copper	14.3	26.9	180	11.9	19.7	7.84	134	na	na	91.6	3130	46700
Lead	6.48	63.6	66.3	11.1	12.1	4.7	535	37.3	16.0	27	400	800
Zinc	18.0	49.0	183	26.5	85.4	25.7	91.9	na	na	NS	23500	100000
Detected volatile organic compounds (VOCs)												
n-Butylbenzene	<0.021	<0.022	0.0297	<0.022	<0.022	<0.027	<0.021	na	na	NS	108	108
Chloromethane	<0.021	<0.022	<0.022	<0.022	<0.022	<0.027	<0.021	na	na	0.0155	159	669
1,2-Dichlorobenzene	<0.021	<0.022	0.0493	<0.022	<0.022	<0.027	<0.021	na	na	1.168	376	376
1,4-Dichlorobenzene	<0.021	<0.022	1.12	<0.022	<0.022	<0.027	<0.021	na	na	0.144	3.74	16.4
Methyl tert butyl ether	<0.021	<0.022	<0.022	<0.022	<0.022	<0.027	<0.021	na	na	0.027	63.8	282
Naphthalene	<0.021	<0.022	0.339	<0.022	<0.022	<0.027	<0.021	na	na	0.6582	5.52	24.1
Toluene	<0.021	<0.022	0.0224	<0.022	<0.022	<0.027	<0.021	na	na	1.1072	818	818
1,1,1-Trichloroethane	<0.021	<0.022	<0.022	<0.022	<0.022	<0.027	<0.021	na	na	0.1402	640	640
Trichlorofluoromethane	<0.021	0.0382	<0.022	0.0264	0.0299	0.0670	<0.021	na	na	4.4775	1230	1230
1,2,4-TMB	<0.021	<0.022	<0.022	<0.022	<0.022	<0.027	<0.021	na	na	NS	219	219
1,3,5-TMB	<0.021	<0.022	<0.022	<0.022	<0.022	<0.027	<0.021	na	na	NS	182	182
TMBs combined	<0.042	<0.044	<0.044	<0.044	<0.044	<0.054	<0.042	na	na	1.3821	NS	NS
Detected polychlorinated biphenyls (PCBs)												
Aroclor 1260	0.103	na	na	na	na	na	na	na	na	0.0094	0.243	1
Shallow Soil (Industrial) Multiple Contaminant Cumulative <sup>(1)</sup>												
Cancer Risk (CCR)	1.0E-07	--	8.5E-08	--	--	--	1.5E-10	--	--	--	NR 720.12 CCR Threshold=1E-05	
Hazard Index (HI)	--	0.0795	0.0908	--	--	--	0.674	--	--	--	NR 720.12 HI Threshold=1.0	

TABLE 2

DRAINAGE DITCH #3 CONFIRMATION SOIL SAMPLE FIELD SCREENING DATA (ppmv) AND LABORATORY ANALYTICAL RESULTS (mg/kg)

Description/Sample ID	DD3-200E	DD3-200W	DD3-300B	DD3-300E	DD3-300W	DD3-350B	DD3-400B	DD3-400N	NR 720 RCL (mg/kg)		
Sample Date	6/17/98	6/17/98	6/17/98	6/17/98	6/17/98	6/17/98	6/18/98	6/18/98	Soil to	Non-Industrial	Industrial
Base/Sidewall	Sidewall	Sidewall	Base	Sidewall	Sidewall	Base	Base	Sidewall	Groundwater	Direct	Direct
FID (ppmv)	0	0	0	0	0	0	0	0	Pathway	Contact	Contact
<b>Detected metals</b>											
Cadmium	0.134	<0.1	0.153	<0.1	0.102	--	<0.1	0.106	0.752	71.1	985
Copper	14.9	12.2	13.2	16.1	13.5	--	16.8	9.79	91.6	3130	46700
Lead	1.84	1.65	1.31	0.914	0.840	--	2.27	6.56	27	400	800
Zinc	23.5	17.5	19.6	15.1	17.6	--	16.2	27.8	NS	23500	100000
<b>Detected volatile organic compounds (VOCs)</b>											
n-Butylbenzene	<0.021	<0.022	<0.022	<0.022	<0.022	--	<0.02	<0.021	NS	108	108
Chloromethane	<0.021	<0.022	0.0265	0.0283	0.0237	--	<0.02	<0.021	0.0155	159	669
1,2-Dichlorobenzene	<0.021	<0.022	<0.022	<0.022	<0.022	--	<0.02	<0.021	1.168	376	376
1,4-Dichlorobenzene	<0.021	<0.022	<0.022	<0.022	<0.022	--	0.0211	<0.021	0.144	3.74	16.4
Methyl tert butyl ether	<0.021	<0.022	<0.022	<0.022	<0.022	--	0.124	0.319	0.027	63.8	282
Naphthalene	<0.021	<0.022	<0.022	<0.022	<0.022	--	0.0786	<0.021	0.6582	5.52	24.1
Toluene	<0.021	<0.022	<0.022	<0.022	<0.022	--	<0.02	<0.021	1.1072	818	818
1,1,1-Trichloroethane	<0.021	<0.022	<0.022	<0.022	<0.022	--	<0.02	<0.021	0.1402	640	640
Trichlorofluoromethane	0.0369	0.0249	0.0802	0.0578	<0.022	--	<0.02	<0.021	4.4775	1230	1230
1,2,4-TMB	<0.021	<0.022	<0.02	<0.022	<0.022	--	<0.02	<0.021	NS	219	219
1,3,5-TMB	<0.021	<0.022	<0.02	<0.022	<0.022	--	<0.02	<0.021	NS	182	182
TMBs combined	<0.042	<0.044	<0.04	<0.044	<0.044	--	<0.04	<0.042	1.3821	NS	NS
<b>Detected polychlorinated biphenyls (PCBs)</b>											
Aroclor 1260	--	--	--	--	--	<0.0082	--	--	0.0094	0.243	1
<b>Shallow Soil (Industrial) Multiple Contaminant Cumulative<sup>(1)</sup></b>											
Cancer Risk (CCR)	--	--	--	--	--	--	5.0E-10	1.1E-09	NR 720.12 CCR Threshold=1E-05		
Hazard Index (HI)	--	--	--	--	--	--	0.0001	--	NR 720.12 HI Threshold=1.0		



TABLE 2

DRAINAGE DITCH #3 CONFIRMATION SOIL SAMPLE FIELD SCREENING DATA (ppmv) AND LABORATORY ANALYTICAL RESULTS (mg/kg)

Description/Sample ID	DD3-400S	DD3-475-B	DD3-500B	DD3-500B2	DD3-500N	DD3-500S	DD3-NTB	DD3-NTE	NR 720 RCL (mg/kg)		
Sample Date	6/18/98	6/18/98	6/18/98	6/22/98	6/18/98	6/18/98	6/18/98	6/18/98	Soil to	Non-Industrial	Industrial
Base/Sidewall	Sidewall	Base	Base	Base	Sidewall	Sidewall	Base	Sidewall	Groundwater	Direct	Direct
FID (ppmv)	0.2	0.1	2.2	2.1	1.0	0.2	0.1	0	Pathway	Contact	Contact
<b>Detected metals</b>											
Cadmium	0.156	<0.1	0.293	0.237	0.128	<0.11	1.31	<0.11	0.752	71.1	985
Copper	14.7	22.8	14.5	9.49	9.19	3.52	50.2	10.4	91.6	3130	46700
Lead	4.82	1.27	1.49	<0.57	1.30	<0.56	6.77	1.79	27	400	800
Zinc	25.4	17.3	22.4	19.1	20.8	4.73	52.9	14.6	NS	23500	100000
<b>Detected volatile organic compounds (VOCs)</b>											
n-Butylbenzene	<0.021	<0.021	<0.022	<0.023	<0.024	<0.023	<0.022	<0.022	NS	108	108
Chloromethane	<0.021	<0.021	<0.022	<0.023	<0.024	<0.023	<0.022	<0.022	0.0155	159	669
1,2-Dichlorobenzene	<0.021	<0.021	<0.022	<0.023	<0.024	<0.023	<0.022	<0.022	1.168	376	376
1,4-Dichlorobenzene	<0.021	<0.021	<0.022	<0.023	<0.024	<0.023	<0.022	<0.022	0.144	3.74	16.4
Methyl tert butyl ether	0.312	0.184	0.300	0.0251	0.0774	<0.023	<0.022	<0.022	0.027	63.8	282
Naphthalene	<0.021	<0.021	<0.022	<0.023	<0.024	<0.023	<0.022	<0.022	0.6582	5.52	24.1
Toluene	<0.021	<0.021	<0.022	<0.023	<0.024	<0.023	<0.022	<0.022	1.1072	818	818
1,1,1-Trichloroethane	<0.021	<0.021	0.0501	0.0438	<0.024	<0.023	<0.022	0.0546	0.1402	640	640
Trichlorofluoromethane	<0.021	<0.021	<0.022	<0.023	<0.024	<0.023	<0.022	<0.022	4.4775	1230	1230
1,2,4-TMB	<0.021	<0.021	<0.022	<0.023	<0.024	<0.023	<0.022	<0.022	NS	219	219
1,3,5-TMB	<0.021	<0.021	<0.022	<0.023	<0.024	<0.023	<0.022	<0.022	NS	182	182
TMBs combined	<0.042	<0.042	<0.044	<0.046	<0.048	<0.046	<0.044	<0.044	1.3821	NS	NS
<b>Detected polychlorinated biphenyls (PCBs)</b>											
Aroclor 1260	--	--	--	--	--	--	--	--	0.0094	0.243	1
<b>Shallow Soil (Industrial) Multiple Contaminant Cumulative<sup>(1)</sup></b>											
Cancer Risk (CCR)	1.1E-09	6.5E-10	1.1E-09	8.9E-11	2.7E-10	--	1.2E-10	--	NR 720.12 CCR Threshold=1E-05		
Hazard Index (HI)	--	--	--	--	--	--	0.0024	--	NR 720.12 HI Threshold=1.0		

TABLE 2

DRAINAGE DITCH #3 CONFIRMATION SOIL SAMPLE FIELD SCREENING DATA (ppmv) AND LABORATORY ANALYTICAL RESULTS (mg/kg)

Description/Sample ID	DD3-NTW	DD3-600B	DD3-600N	DD3-600S	DD3-WTB	DD3-WTN	DD3-WTS	DD3-700B	NR 720 RCL (mg/kg)		
Sample Date	6/18/98	6/19/98	6/19/98	6/19/98	6/22/98	6/22/98	6/22/98	6/23/98	Soil to	Non-Industrial	Industrial
Base/Sidewall	Sidewall	Base	Sidewall	Sidewall	Base	Sidewall	Sidewall	Base	Groundwater	Direct	Direct
FID (ppmv)	0	0.4	0.1	0.4	0	0	0.1	1.8	Pathway	Contact	Contact
<b>Detected metals</b>											
Cadmium	0.669	<0.1	0.194	0.339	<0.1	<0.1	<0.11	0.895	0.752	71.1	985
Copper	32.7	11.0	12.7	22.5	17.0	9.92	5.43	26.7	91.6	3130	46700
Lead	12.2	<0.55	0.695	2.21	0.919	1.43	2.99	<0.55	27	400	800
Zinc	54.1	12.5	15.1	17.5	26.7	14.7	16.0	33.8	NS	23500	100000
<b>Detected volatile organic compounds (VOCs)</b>											
n-Butylbenzene	<0.022	<0.023	<0.022	<0.021	<0.022	<0.022	<0.024	<0.022	NS	108	108
Chloromethane	<0.022	<0.023	<0.022	<0.021	<0.022	<0.022	<0.024	<0.022	0.0155	159	669
1,2-Dichlorobenzene	<0.022	<0.023	<0.022	<0.021	<0.022	<0.022	<0.024	<0.022	1.168	376	376
1,4-Dichlorobenzene	<0.022	<0.023	<0.022	<0.021	<0.022	<0.022	<0.024	<0.022	0.144	3.74	16.4
Methyl tert butyl ether	<0.022	<0.023	<0.022	<0.021	0.0295	0.0517	0.0461	<0.022	0.027	63.8	282
Naphthalene	<0.022	<0.023	<0.022	<0.021	<0.022	<0.022	<0.024	<0.022	0.6582	5.52	24.1
Toluene	<0.022	<0.023	<0.022	<0.021	<0.022	<0.022	<0.024	<0.022	1.1072	818	818
1,1,1-Trichloroethane	0.0493	<0.023	<0.022	<0.021	<0.022	<0.022	<0.024	<0.022	0.1402	640	640
Trichlorofluoromethane	<0.022	<0.023	<0.022	<0.021	<0.022	<0.022	<0.024	<0.022	4.4775	1230	1230
1,2,4-TMB	<0.022	<0.023	<0.022	<0.021	<0.022	<0.022	<0.024	<0.022	NS	219	219
1,3,5-TMB	<0.022	<0.023	<0.022	<0.021	<0.022	<0.022	<0.024	<0.022	NS	182	182
TMBs combined	<0.044	<0.046	<0.044	<0.042	<0.044	<0.044	<0.048	<0.044	1.3821	NS	NS
<b>Detected polychlorinated biphenyls (PCBs)</b>											
Aroclor 1260	--	<0.0072	--	--	--	--	--	--	0.0094	0.243	1
<b>Shallow Soil (Industrial) Multiple Contaminant Cumulative<sup>(1)</sup></b>											
Cancer Risk (CCR)	--	--	--	--	1.0E-10	1.8E-10	1.6E-10	--	NR 720.12 CCR Threshold=1E-05		
Hazard Index (HI)	--	--	--	--	--	--	--	--	NR 720.12 HI Threshold=1.0		

TABLE 2

DRAINAGE DITCH #3 CONFIRMATION SOIL SAMPLE FIELD SCREENING DATA (ppmv) AND LABORATORY ANALYTICAL RESULTS (mg/kg)

Description/Sample ID	DD3-700E	DD3-700W	DD3-800B	DD3-800E	DD3-800W	DD3-900B	DD3-900E	DD3-900W	NR 720 RCL (mg/kg)		
Sample Date	6/23/98	6/23/98	6/23/98	6/23/98	6/23/98	6/23/98	6/23/98	6/23/98	Soil to	Non-Industrial	Industrial
Base/Sidewall	Sidewall	Sidewall	Base	Sidewall	Sidewall	Base	Sidewall	Sidewall	Groundwater	Direct	Direct
FID (ppmv)	0	0	0.2	0.1	0.1	0	0	0.2	Pathway	Contact	Contact
<b>Detected metals</b>											
Cadmium	0.804	0.491	<0.1	1.09	1.83	0.665	0.447	5.23	0.752	71.1	985
Copper	23.1	13.7	12.5	22.0	46.3	16.3	15.2	85.2	91.6	3130	46700
Lead	0.711	0.583	0.697	<0.55	3.45	1.80	2.21	3.05	27	400	800
Zinc	27.3	20.3	10.9	17.9	46.6	21.7	24.7	91.1	NS	23500	100000
<b>Detected volatile organic compounds (VOCs)</b>											
n-Butylbenzene	<0.022	<0.021	<0.023	<0.022	<0.022	<0.021	<0.021	<0.021	NS	108	108
Chloromethane	<0.022	<0.021	<0.023	<0.022	<0.022	<0.021	<0.021	<0.021	0.0155	159	669
1,2-Dichlorobenzene	<0.022	<0.021	<0.023	<0.022	<0.022	<0.021	<0.021	<0.021	1.168	376	376
1,4-Dichlorobenzene	<0.022	<0.021	<0.023	<0.022	<0.022	<0.021	<0.021	<0.021	0.144	3.74	16.4
Methyl tert butyl ether	<0.022	<0.021	<0.023	<0.022	<0.022	<0.021	<0.021	<0.021	0.027	63.8	282
Naphthalene	<0.022	<0.021	<0.023	<0.022	<0.022	<0.021	<0.021	<0.021	0.6582	5.52	24.1
Toluene	<0.022	<0.021	<0.023	<0.022	<0.022	<0.021	<0.021	<0.021	1.1072	818	818
1,1,1-Trichloroethane	<0.022	<0.021	<0.023	<0.022	<0.022	<0.021	<0.021	<0.021	0.1402	640	640
Trichlorofluoromethane	<0.022	0.0796	0.0364	<0.022	<0.022	<0.021	<0.021	<0.021	4.4775	1230	1230
1,2,4-TMB	0.0305	<0.021	<0.023	<0.022	<0.022	<0.021	<0.021	<0.021	NS	219	219
1,3,5-TMB	<0.022	<0.021	<0.023	<0.022	<0.022	<0.021	<0.021	<0.021	NS	182	182
TMBs combined	<0.0525	<0.042	<0.046	<0.044	<0.044	<0.042	<0.042	<0.042	1.3821	NS	NS
<b>Detected polychlorinated biphenyls (PCBs)</b>											
Aroclor 1260	--	--	--	--	--	0.0202	--	--	0.0094	0.243	1
<b>Shallow Soil (Industrial) Multiple Contaminant Cumulative<sup>(1)</sup></b>											
Cancer Risk (CCR)	--	--	--	1.0E-10	1.7E-10	2.0E-08	--	4.9E-10	NR 720.12 CCR Threshold=1E-05		
Hazard Index (HI)	--	--	--	0.0011	0.0028	--	--	0.0071	NR 720.12 HI Threshold=1.0		

TABLE 2

DRAINAGE DITCH #3 CONFIRMATION SOIL SAMPLE FIELD SCREENING DATA (ppmv) AND LABORATORY ANALYTICAL RESULTS (mg/kg)

Concentrations and NR 720 RCLs are in units of milligrams per kilogram (mg/kg) on a dry-weight basis. Only compounds detected in one or more samples are included in the table. No results at or above an applicable NR 720 industrial direct contact RCL.

Detected concentrations at or above an applicable NR 720 non-industrial direct contact RCL are in red font.

Detected concentrations at or above an applicable NR 720 soil to groundwater (GW) pathway RCL are italicized.

NR 720 residual contaminant level (RCL) concentrations from WDNR's RR Program Soil RCL Excel workbook updated March 2017.

Sample depths are not shown on table because all samples were conservatively assumed to be within 4 feet of ground surface (ft bgs) at the time of collection. Although a number of the base samples were >4 ft bgs, their depths were not measured or recorded.

DD3-200B2 = Drainage Ditch #3 - Position 200 - first supplemental base sample for lead.

DD3-200B3 = Drainage Ditch #3 - Position 200 - second supplemental base sample for lead.

DD3-500B2 = Drainage Ditch #3 - Position 500 - base sample following supplemental excavation.

FID = Flame ionization detector reading in parts per million, volume (ppmv).

na = Not analyzed.

nm = Not measured.

NS = No standard.

TMBs (combined) = Trimethylbenzenes (1,2,4- and 1,3,5- combined).

-- = Not applicable and/or negligible for CCR and/or HI levels, as shown.

FOOTNOTE:

(1) Industrial/multiple contaminant cumulative cancer risk (CCR) and hazard index (HI) levels, if applicable (for samples within 4 feet of ground surface and based on detected concentrations only). Thresholds are 1E-05 for CCR and 1.0 for HI per NR 720.12(1)(b). No CCR or HI levels at or above their respective thresholds were calculated.

NATIONAL PRESTO INDUSTRIES, INC.  
EAU CLAIRE, WISCONSIN

TABLE 3

LOADING DOCK AREA SOIL ANALYTICAL RESULTS SUMMARY (AUGUST 2001)

Group/Substance/CCR-HI	Concentration (mg/kg) for Metals and PAHs				NR 720 RCL (mg/kg)			
	Sample ID	B-1A	B-2A	B-3A	B-4A	Soil to	Non-Industrial	Industrial
	Sample Depth (ft bgs)	4	4	4	4	Groundwater	Direct	Direct
	Sample Date	8/9/01	8/9/01	8/9/01	8/9/01	Pathway	Contact	Contact
<b>Metals</b>								
Cadmium	<0.0341	<0.034	<0.0343	<0.0335	<i>0.752</i>	<b>71.1</b>	<b>985</b>	
Chromium <sup>(1)</sup>	9.27	12.1	8.63	8.49	<i>360000</i>	<b>100000</b>	<b>100000</b>	
Nickel	9.54	<i>14.2</i>	8.15	9.92	<i>13.0612</i>	<b>1550</b>	<b>22500</b>	
Zinc	38.9	20.9	71.5	15.4	NS	<b>23500</b>	<b>100000</b>	
<b>Polycyclic aromatic hydrocarbons (PAHs) by EPA Method 8310</b>								
Acenaphthene	<0.0064	<0.00639	<0.00644	<0.00629	NS	<b>3590</b>	<b>45200</b>	
Acenaphthylene	<0.00433	<0.00433	<0.00437	<0.00426	NS	NS	NS	
Anthracene	0.00552	<0.00299	<0.00301	<0.00294	<i>196.9492</i>	<b>17900</b>	<b>100000</b>	
Benzo(a)Anthracene	<0.00258	0.03363	<0.0026	<0.00254	NS	<b>1.14</b>	<b>20.8</b>	
Benzo(a)Pyrene	0.0102	0.00658	<0.00239	<0.00233	<i>0.47</i>	<b>0.115</b>	<b>2.11</b>	
Benzo(b)Fluoranthene	0.007	0.00374	<0.00114	<0.00112	<i>0.4793</i>	<b>1.15</b>	<b>21.1</b>	
Benzo(ghi)Perylene	0.00399	0.00397	<0.00104	<0.00101	NS	NS	NS	
Benzo(k)Fluoranthene	0.00329	0.0021	<0.00125	<0.00122	NS	<b>11.5</b>	<b>211</b>	
Chrysene	0.00374	0.00445	<0.00208	<0.00203	<i>0.1446</i>	<b>115</b>	<b>2110</b>	
Dibenzo(a,h)Anthracene	<0.00144	<0.00144	<0.00146	<0.00142	NS	<b>0.115</b>	<b>2.11</b>	
Fluoranthene	0.0157	0.0125	0.00872	<0.00264	<i>88.8778</i>	<b>2390</b>	<b>30100</b>	
Fluorene	<0.00361	<0.00361	<0.00364	<0.00355	<i>14.8299</i>	<b>2390</b>	<b>30100</b>	
Indeno(1,2,3-cd)Pyrene	0.00643	0.00377	<0.00177	<0.00172	NS	<b>1.15</b>	<b>21.1</b>	
1-Methyl Naphthalene	<0.00299	<0.00299	<0.00301	<0.00294	NS	<b>17.6</b>	<b>72.7</b>	
2-Methyl Naphthalene	<0.00237	<0.00237	<0.00239	<0.00233	NS	<b>239</b>	<b>3010</b>	
Naphthalene	<0.00402	<0.00402	<0.00405	<0.00396	<i>0.6582</i>	<b>5.52</b>	<b>24.1</b>	
Phenanthrene	0.0153	0.00394	<0.00166	<0.00162	NS	NS	NS	
Pyrene	0.00334	<0.0032	<0.00322	<0.00314	<i>54.5455</i>	<b>1790</b>	<b>22600</b>	
<b>Shallow Soil (Industrial) Multiple Contaminant Cumulative<sup>(2)</sup></b>								
Cancer Risk (CCR)	5.5E-09	5.1E-09	--	--	NR 720.12 CCR Threshold=1E-5			
Hazard Index (HI)	0.0001	--	--	--	NR 720.12 HI Threshold=1			

**NOTES:**

Concentrations and NR 720 RCLs are in milligrams per kilogram (mg/kg) on a dry-weight basis.  
 Samples from all four base locations were also analyzed for volatile organic compounds (VOCs) and were non-detect for VOCs.  
 No results at or above an applicable NR 720 nond-industrial or industrial direct contact RCL.  
 Detected concentrations at or above an applicable NR 720 soil to groundwater (GW) pathway RCL are italicized.  
 NR 720 residual contaminant level (RCL) concentrations from WDNR's RR Program Soil RCL Excel workbook updated March 2017.  
 Sample depths are in feet below ground surface (ft bgs) at the time of collection.  
 NS = No standard.  
 -- = Not applicable and/or negligible for CCR and/or HI levels, as shown.

**FOOTNOTES:**

(1) Sample concentrations and the Soil to GW RCL are for total chromium; the direct contact RCLs are for trivalent chromium.  
 (2) Industrial multiple contaminant cumulative cancer risk (CCR) and hazard index (HI) levels, if applicable (for samples within 4 feet of ground surface and based on detected concentrations only). Thresholds are 1E-5 for CCR and 1 for HI per NR 720.12(1)(b). No CCR or HI levels at or above their respective thresholds were calculated.

NATIONAL PRESTO INDUSTRIES, INC.  
EAU CLAIRE, WISCONSIN

TABLE 4

## LOADING DOCK AREA RESIDUAL SOIL ANALYTICAL RESULTS (DECEMBER 2001 AND JUNE 2009)

Group/Substance/CCR-HI	Concentration (mg/kg) for Metals/PAHs/VOCs				NR 720 RCL (mg/kg)			
	Sample ID	EB-1	EB-2	EB-3	EB-4	Soil to Groundwater Pathway	Non-Industrial Direct Contact	Industrial Direct Contact
	Sample Depth (ft bgs)	3.5-4	3.5-4	3.5-4	3.5-4			
	Sample Date	12/18/01	12/18/01	12/18/01	12/18/01			
<b>Metals</b>								
Cadmium		2.42	0.705	0.88	6.72	0.752	71.1	985
Chromium <sup>(1)</sup>		26.1	20.0	34.8	72.8	360000	100000	100000
<b>Polycyclic aromatic hydrocarbons (PAHs) by EPA Method 8310</b>								
Acenaphthene		<0.0513	0.208	1.37	0.006	NS	3590	45200
Acenaphthylene		<0.072	<0.287	<0.701	<0.00713	NS	NS	NS
Anthracene		0.119	0.21	6.79	<0.00108	196.9492	17900	100000
Benzo(a)Anthracene		0.105	0.331	15.8	0.0234	NS	1.14	20.8
Benzo(a)Pyrene		0.0391	<0.1	13.5	0.00734	0.47	0.115	2.11
Benzo(b)Fluoranthene		0.0684	0.226	17.6	0.0249	0.4793	1.15	21.1
Benzo(ghi)Perylene		0.0406	<0.126	5.42	0.0148	NS	NS	NS
Benzo(k)Fluoranthene		<0.0229	<0.0914	11.5	<0.00227	NS	11.5	211
Chrysene		0.154	0.54	18.5	0.0353	0.1446	115	2110
Dibenzo(a,h)Anthracene		<0.0153	<0.0609	2.86	<0.00151	NS	0.115	2.11
Fluoranthene		0.308	0.343	26.0	0.0432	88.8778	2390	30100
Fluorene		0.0663	<0.0871	2.96	0.0162	14.8299	2390	30100
Indeno(1,2,3-cd)Pyrene		<0.0174	<0.0696	6.50	0.0129	NS	1.15	21.1
1-Methyl Naphthalene		<0.0382	0.407	1.30	0.0247	NS	17.6	72.7
2-Methyl Naphthalene		<0.0447	0.461	1.80	0.0292	NS	239	3010
Naphthalene <sup>(2)</sup>		0.032	0.201	1.58	0.0183	0.6582	5.52	24.1
Phenanthrene		0.361	0.645	17.5	0.072	NS	NS	NS
Pyrene		0.241	0.517	27.8	0.0492	54.5455	1790	22600
<b>Detected volatile organic compounds (VOCs) by EPA Method 8021</b>								
n-Butylbenzene		<0.025	0.718	<0.025	0.0687	NS	108	108
sec-Butylbenzene		<0.025	0.498	<0.025	<0.025	NS	145	145
1,1-Dichloroethane		<0.025	0.61	0.0535	<0.025	0.4834	5.06	22.2
Ethylbenzene		<0.025	0.0532	<0.025	<0.025	1.57	8.02	35.4
p-Isopropyltoluene		<0.025	0.51	<0.025	0.0488	NS	162	162
Methylene Chloride <sup>(3)</sup>		<0.025	<0.025	<0.025	<0.025	0.0026	61.8	1150
Naphthalene <sup>(4)</sup>		<0.025	1.04	0.178	0.327	0.6582	5.52	24.1
n-Propylbenzene		<0.025	0.103	<0.025	<0.025	NS	264	264
Tetrachloroethylene		<0.025	0.0306	0.142	<0.025	0.0045	33	145
Toluene		<0.025	0.155	<0.025	0.0283	1.1072	818	818
1,1,1-Trichloroethane		<0.025	0.227	0.134	0.126	0.1402	640	640
Trichloroethylene		<0.025	<0.025	0.191	0.0745	0.0036	1.3	8.41
Trichlorofluoromethane		<0.025	<0.025	<0.025	0.041	4.4775	1230	1230
1,2,4-Trimethylbenzene		<0.025	0.957	<0.025	<0.025	NS	219	219
1,3,5-Trimethylbenzene		<0.025	0.42	<0.025	<0.025	NS	182	182
TMBs combined		<0.050	1.377	<0.050	<0.050	1.3821	NS	NS
Xylenes		<0.050	0.361	<0.050	<0.050	3.96	260	260
<b>Shallow Soil (Industrial) Multiple Contaminant Cumulative<sup>(5)</sup></b>								
Cancer Risk (CCR)		2.8E-08	1.0E-07	9.8E-06	3.0E-08	NR 720.12 CCR Threshold=1E-5		
Hazard Index (HI)		0.0027	0.0022	0.073	0.0101	NR 720.12 HI Threshold=1		

TABLE 4

## LOADING DOCK AREA RESIDUAL SOIL ANALYTICAL RESULTS (DECEMBER 2001 AND JUNE 2009)

Group/Substance/CCR-HI	Concentration (mg/kg) for Metals/PAHs/VOCs				NR 720 RCL (mg/kg)		
Sample ID	EB-5	EB-6	PB-1	PB-2	Soil to Groundwater Pathway	Non-Industrial Direct Contact	Industrial Direct Contact
Sample Depth (ft bgs)	3.5-4	3.5-4	0-0.5	0-0.5			
Sample Date	12/18/01	12/18/01	12/19/01	12/19/01			
<b>Metals</b>							
Cadmium	1.46	16.4	0.107	0.103	0.752	71.1	985
Chromium <sup>(1)</sup>	46.2	188	19.1	18.3	360000	100000	100000
<b>Polycyclic aromatic hydrocarbons (PAHs) by EPA Method 8310</b>							
Acenaphthene	1.10	<0.0504	<0.0504	0.0125	NS	3590	45200
Acenaphthylene	<0.693	<0.0708	<0.0708	<0.0072	NS	NS	NS
Anthracene	3.48	<0.0107	0.0575	0.0425	196.9492	17900	100000
Benzo(a)Anthracene	3.82	<0.044	0.144	0.0556	NS	1.14	20.8
Benzo(a)Pyrene	2.10	<0.0247	0.107	0.0441	0.47	0.115	2.11
Benzo(b)Fluoranthene	2.84	<0.0225	0.163	0.0641	0.4793	1.15	21.1
Benzo(ghi)Perylene	1.05	<0.0311	0.0542	0.0218	NS	NS	NS
Benzo(k)Fluoranthene	1.09	<0.0225	0.114	0.0541	NS	11.5	211
Chrysene	1.91	<0.0247	0.188	0.0866	0.1446	115	2110
Dibenzo(a,h)Anthracene	0.508	<0.015	0.0594	0.011	NS	0.115	2.11
Fluoranthene	8.75	0.0334	0.335	0.118	88.8778	2390	30100
Fluorene	1.93	<0.0215	0.0253	0.019	14.8299	2390	30100
Indeno(1,2,3-cd)Pyrene	1.16	<0.0172	0.0983	0.0369	NS	1.15	21.1
1-Methyl Naphthalene	1.53	<0.0376	<0.0376	0.0126	NS	17.6	72.7
2-Methyl Naphthalene	1.86	<0.044	<0.044	0.0161	NS	239	3010
Naphthalene <sup>(2)</sup>	1.23	<0.0172	<0.0172	0.00835	0.6582	5.52	24.1
Phenanthrene	6.71	0.0309	0.223	0.119	NS	NS	NS
Pyrene	7.88	0.0327	0.273	0.105	54.5455	1790	22600
<b>Detected volatile organic compounds (VOCs) by EPA Method 8021</b>							
n-Butylbenzene	<0.025	<0.025	<0.025	<0.025	NS	108	108
sec-Butylbenzene	<0.025	<0.025	<0.025	<0.025	NS	145	145
1,1-Dichloroethane	<0.025	<0.025	<0.025	<0.025	0.4834	5.06	22.2
Ethylbenzene	<0.025	<0.025	<0.025	<0.025	1.57	8.02	35.4
p-Isopropyltoluene	<0.025	<0.025	<0.025	<0.025	NS	162	162
Methylene Chloride <sup>(3)</sup>	<0.025	<0.025	<0.025	<0.025	0.0026	61.8	1150
Naphthalene <sup>(4)</sup>	1.88	<0.025	<0.025	<0.025	0.6582	5.52	24.1
n-Propylbenzene	<0.025	<0.025	<0.025	<0.025	NS	264	264
Tetrachloroethylene	<0.025	<0.025	<0.025	<0.025	0.0045	33	145
Toluene	0.0677	<0.025	<0.025	<0.025	1.1072	818	818
1,1,1-Trichloroethane	0.174	<0.025	<0.025	<0.025	0.1402	640	640
Trichloroethylene	<0.025	<0.025	<0.025	<0.025	0.0036	1.3	8.41
Trichlorofluoromethane	<0.025	<0.025	<0.025	<0.025	4.4775	1230	1230
1,2,4-Trimethylbenzene	0.035	<0.025	<0.025	<0.025	NS	219	219
1,3,5-Trimethylbenzene	<0.025	<0.025	<0.025	<0.025	NS	182	182
TMBs combined	<0.060	<0.050	<0.050	<0.050	1.3821	NS	NS
Xylenes	<0.0533	<0.050	<0.050	<0.050	3.96	260	260
<b>Shallow Soil (Industrial) Multiple Contaminant Cumulative<sup>(5)</sup></b>							
Cancer Risk (CCR)	1.7E-06	1.5E-09	9.9E-08	3.4E-08	NR 720.12 CCR Threshold=1E-5		
Hazard Index (HI)	0.0146	0.0167	0.0005	0.0002	NR 720.12 HI Threshold=1		



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## LOADING DOCK AREA RESIDUAL SOIL ANALYTICAL RESULTS (DECEMBER 2001 AND JUNE 2009)

Group/Substance/CCR-HI	Concentration (mg/kg) for Metals/PAHs/VOCs				NR 720 RCL (mg/kg)		
Sample ID	PB-3	PB-4	PB-5	PB-6	Soil to Groundwater Pathway	Non-Industrial Direct Contact	Industrial Direct Contact
Sample Depth (ft bgs)	0-0.5	0-0.5	0-0.5	0-0.5			
Sample Date	12/19/01	12/19/01	12/19/01	12/19/01			
<b>Metals</b>							
Cadmium	0.0766	0.352	11.3	0.297	0.752	71.1	985
Chromium <sup>(1)</sup>	16.1	18.0	74.7	20.5	360000	100000	100000
<b>Polycyclic aromatic hydrocarbons (PAHs) by EPA Method 8310</b>							
Acenaphthene	0.0402	<0.00502	0.179	<0.00505	NS	3590	45200
Acenaphthylene	<0.00702	<0.00704	<0.0705	<0.0071	NS	NS	NS
Anthracene	0.118	0.00744	0.412	0.0091	196.9492	17900	100000
Benzo(a)Anthracene	0.148	0.0203	0.474	0.0219	NS	1.14	20.8
Benzo(a)Pyrene	0.126	0.016	0.286	0.0283	0.47	0.115	2.11
Benzo(b)Fluoranthene	0.141	0.0252	0.489	0.0284	0.4793	1.15	21.1
Benzo(ghi)Perylene	0.0497	0.0108	0.143	0.0108	NS	NS	NS
Benzo(k)Fluoranthene	0.104	0.0199	0.275	0.0172	NS	11.5	211
Chrysene	0.193	0.0307	0.635	0.0351	0.1446	115	2110
Dibenzo(a,h)Anthracene	0.023	0.00343	0.151	0.0043	NS	0.115	2.11
Fluoranthene	0.384	0.0443	1.38	0.0487	88.8778	2390	30100
Fluorene	0.0652	0.00398	0.212	0.0066	14.8299	2390	30100
Indeno(1,2,3-cd)Pyrene	0.0848	0.022	0.241	0.0204	NS	1.15	21.1
1-Methyl Naphthalene	0.0283	<0.00374	0.0863	0.00463	NS	17.6	72.7
2-Methyl Naphthalene	0.032	<0.00438	0.105	0.00466	NS	239	3010
Naphthalene <sup>(2)</sup>	0.0331	0.00248	0.0663	0.00441	0.6582	5.52	24.1
Phenanthrene	0.409	0.00287	1.43	0.0392	NS	NS	NS
Pyrene	0.31	0.0385	1.05	0.0424	54.5455	1790	22600
<b>Detected volatile organic compounds (VOCs) by EPA Method 8021</b>							
n-Butylbenzene	<0.025	<0.025	0.153	<0.025	NS	108	108
sec-Butylbenzene	<0.025	<0.025	<0.025	<0.025	NS	145	145
1,1-Dichloroethane	<0.025	<0.025	0.113	<0.025	0.4834	5.06	22.2
Ethylbenzene	<0.025	<0.025	<0.025	<0.025	1.57	8.02	35.4
p-Isopropyltoluene	<0.025	<0.025	0.0958	<0.025	NS	162	162
Methylene Chloride <sup>(3)</sup>	0.0272	<0.025	<0.025	<0.025	0.0026	61.8	1150
Naphthalene <sup>(4)</sup>	0.0616	<0.025	0.161	0.0291	0.6582	5.52	24.1
n-Propylbenzene	<0.025	<0.025	<0.025	<0.025	NS	264	264
Tetrachloroethylene	<0.025	<0.025	0.0682	<0.025	0.0045	33	145
Toluene	<0.025	<0.025	<0.025	<0.025	1.1072	818	818
1,1,1-Trichloroethane	<0.025	<0.025	0.0499	<0.025	0.1402	640	640
Trichloroethylene	<0.025	<0.025	0.233	<0.025	0.0036	1.3	8.41
Trichlorofluoromethane	0.0834	<0.025	<0.025	<0.025	4.4775	1230	1230
1,2,4-Trimethylbenzene	0.0414	<0.025	0.0972	<0.025	NS	219	219
1,3,5-Trimethylbenzene	<0.025	<0.025	0.0768	<0.025	NS	182	182
TMBs combined	<0.0664	<0.050	0.1740	<0.050	1.3821	NS	NS
Xylenes	<0.050	<0.050	<0.050	<0.050	3.96	260	260
<b>Shallow Soil (Industrial) Multiple Contaminant Cumulative<sup>(5)</sup></b>							
Cancer Risk (CCR)	9.2E-08	1.3E-08	3.1E-07	2.0E-08	NR 720.12 CCR Threshold=1E-5		
Hazard Index (HI)	0.0007	0.0001	0.022	0.0002	NR 720.12 HI Threshold=1		



TABLE 4

## LOADING DOCK AREA RESIDUAL SOIL ANALYTICAL RESULTS (DECEMBER 2001 AND JUNE 2009)

Group/Substance/CCR-HI	Concentration (mg/kg) for Metals/PAHs/VOCs				NR 720 RCL (mg/kg)		
Sample ID	PB-7	SS-1	SS-2	SS-3	Soil to Groundwater Pathway	Non-Industrial Direct Contact	Industrial Direct Contact
Sample Depth (ft bgs)	0-0.5	1-3	1-3	1-3			
Sample Date	12/19/01	12/18/01	12/18/01	12/18/01			
<b>Metals</b>							
Cadmium	0.433	1.41	2.97	1.75	0.752	71.1	985
Chromium <sup>(1)</sup>	18.8	55.7	120	115	360000	100000	100000
<b>Polycyclic aromatic hydrocarbons (PAHs) by EPA Method 8310</b>							
Acenaphthene	0.0175	5.74	1.57	3.47	NS	3590	45200
Acenaphthylene	<0.00714	<3.27	<0.775	<4.77	NS	NS	NS
Anthracene	0.0432	4.53	<0.117	3.27	196.9492	17900	100000
Benzo(a)Anthracene	0.0848	4.26	1.35	4.54	NS	1.14	20.8
Benzo(a)Pyrene	0.0680	1.27	<0.27	<1.66	0.47	0.115	2.11
Benzo(b)Fluoranthene	0.116	5.47	<0.246	2.19	0.4793	1.15	21.1
Benzo(ghi)Perylene	0.0498	3.02	<0.34	<2.10	NS	NS	NS
Benzo(k)Fluoranthene	<0.00227	<1.04	<0.246	<1.52	NS	11.5	211
Chrysene	0.0434	<1.14	3.96	11.9	0.1446	115	2110
Dibenzo(a,h)Anthracene	0.0142	<0.693	<0.164	<1.01	NS	0.115	2.11
Fluoranthene	0.247	2.57	1.02	2.77	88.8778	2390	30100
Fluorene	<0.00216	7.35	1.88	2.94	14.8299	2390	30100
Indeno(1,2,3-cd)Pyrene	0.0629	1.66	<0.188	1.87	NS	1.15	21.1
1-Methyl Naphthalene	0.0225	17.7	4.37	7.59	NS	17.6	72.7
2-Methyl Naphthalene	0.0443	24.5	5.96	9.28	NS	239	3010
Naphthalene <sup>(2)</sup>	0.0415	14.1	3.76	5.07	0.6582	5.52	24.1
Phenanthrene	0.21	15.1	4.52	8.88	NS	NS	NS
Pyrene	0.206	4.75	1.76	8.37	54.5455	1790	22600
<b>Detected volatile organic compounds (VOCs) by EPA Method 8021</b>							
n-Butylbenzene	<0.025	3.15	<5.68	<2.00	NS	108	108
sec-Butylbenzene	<0.025	<2.38	<5.68	<2.00	NS	145	145
1,1-Dichloroethane	<0.025	15.5	<5.68	<2.00	0.4834	5.06	22.2
Ethylbenzene	<0.025	<2.38	<5.68	<2.00	1.57	8.02	35.4
p-Isopropyltoluene	<0.025	<2.38	<5.68	<2.00	NS	162	162
Methylene Chloride <sup>(3)</sup>	<0.025	<0.025	<0.025	<0.025	0.0026	61.8	1150
Naphthalene <sup>(4)</sup>	0.0365	14.3	8.63	3.38	0.6582	5.52	24.1
n-Propylbenzene	<0.025	<2.38	<5.68	<2.00	NS	264	264
Tetrachloroethylene	<0.025	<2.38	<5.68	<2.00	0.0045	33	145
Toluene	<0.025	5.09	<5.68	2.61	1.1072	818	818
1,1,1-Trichloroethane	<0.025	123	132	10.7	0.1402	640	640
Trichloroethylene	<0.025	<2.38	<5.68	<2.00	0.0036	1.3	8.41
Trichlorofluoromethane	<0.025	<0.025	<0.025	<0.025	4.4775	1230	1230
1,2,4-Trimethylbenzene	<0.025	6.94	<5.68	<2.00	NS	219	219
1,3,5-Trimethylbenzene	<0.025	<2.38	<5.68	<2.00	NS	182	182
TMBs combined	<0.050	<9.32	<11.36	<4.00	1.3821	NS	NS
Xylenes	<0.050	<6.89	<11.36	<4.00	3.96	260	260
<b>Shallow Soil (Industrial) Multiple Contaminant Cumulative<sup>(5)</sup></b>							
Cancer Risk (CCR)	5.4E-08	2.7E-06	4.9E-07	7.3E-07	NR 720.12 CCR Threshold=1E-5		
Hazard Index (HI)	0.0004	0.0391	0.0183	0.012	NR 720.12 HI Threshold=1		

TABLE 4

## LOADING DOCK AREA RESIDUAL SOIL ANALYTICAL RESULTS (DECEMBER 2001 AND JUNE 2009)

Group/Substance/CCR-HI	Concentration (mg/kg) for Metals/PAHs/VOCs				NR 720 RCL (mg/kg)		
Sample ID	SS-4	SS-5	SS-6	SS-7	Soil to Groundwater Pathway	Non-Industrial Direct Contact	Industrial Direct Contact
Sample Depth (ft bgs)	1-3	1-3	1-3	1-3			
Sample Date	12/18/01	12/18/01	12/18/01	12/18/01			
<b>Metals</b>							
Cadmium	3.63	0.663	1.93	12.2	0.752	71.1	985
Chromium <sup>(1)</sup>	55.7	21.0	45.3	133	360000	100000	100000
<b>Polycyclic aromatic hydrocarbons (PAHs) by EPA Method 8310</b>							
Acenaphthene	<0.00516	0.142	<0.0486	<0.00509	NS	3590	45200
Acenaphthylene	<0.00724	0.19	<0.0683	<0.00715	NS	NS	NS
Anthracene	0.00656	0.0909	0.863	0.00314	196.9492	17900	100000
Benzo(a)Anthracene	0.015	<0.00426	<0.0424	<0.00444	NS	1.14	20.8
Benzo(a)Pyrene	0.00619	<0.00239	<0.0238	0.00369	0.47	0.115	2.11
Benzo(b)Fluoranthene	0.0145	<0.00218	<0.0217	0.00843	0.4793	1.15	21.1
Benzo(ghi)Perylene	0.00622	<0.00301	<0.03	<0.00314	NS	NS	NS
Benzo(k)Fluoranthene	0.0217	<0.00218	<0.0217	0.00544	NS	11.5	211
Chrysene	0.0214	<0.00239	<0.0238	<0.00249	0.1446	115	2110
Dibenzo(a,h)Anthracene	0.00156	<0.00146	<0.0145	<0.00152	NS	0.115	2.11
Fluoranthene	0.039	0.114	0.508	0.017	88.8778	2390	30100
Fluorene	<0.0022	<0.00208	1.03	<0.00217	14.8299	2390	30100
Indeno(1,2,3-cd)Pyrene	0.00591	0.0921	<0.0165	0.00714	NS	1.15	21.1
1-Methyl Naphthalene	<0.00384	0.193	2.29	<0.00379	NS	17.6	72.7
2-Methyl Naphthalene	<0.0045	0.263	3.74	<0.00444	NS	239	3010
Naphthalene <sup>(2)</sup>	0.00199	0.144	2.06	0.00252	0.6582	5.52	24.1
Phenanthrene	0.0255	0.273	2.60	0.0153	NS	NS	NS
Pyrene	0.0303	0.147	0.922	0.0134	54.5455	1790	22600
<b>Detected volatile organic compounds (VOCs) by EPA Method 8021</b>							
n-Butylbenzene	<0.025	<0.025	1.20	<0.025	NS	108	108
sec-Butylbenzene	<0.025	<0.025	<0.1	<0.025	NS	145	145
1,1-Dichloroethane	<0.025	<0.025	1.03	<0.025	0.4834	5.06	22.2
Ethylbenzene	<0.025	<0.025	0.244	<0.025	1.57	8.02	35.4
p-Isopropyltoluene	<0.025	<0.025	1.17	<0.025	NS	162	162
Methylene Chloride <sup>(3)</sup>	<0.025	<0.025	<0.025	<0.025	0.0026	61.8	1150
Naphthalene <sup>(4)</sup>	<0.025	<0.025	2.34	<0.025	0.6582	5.52	24.1
n-Propylbenzene	<0.025	<0.025	0.241	<0.025	NS	264	264
Tetrachloroethylene	<0.025	<0.025	<0.1	<0.025	0.0045	33	145
Toluene	<0.025	<0.025	1.28	<0.025	1.1072	818	818
1,1,1-Trichloroethane	<0.025	<0.025	0.718	<0.025	0.1402	640	640
Trichloroethylene	<0.025	<0.025	<0.1	<0.025	0.0036	1.3	8.41
Trichlorofluoromethane	<0.025	<0.025	<0.025	<0.025	4.4775	1230	1230
1,2,4-Trimethylbenzene	<0.025	<0.025	2.40	<0.025	NS	219	219
1,3,5-Trimethylbenzene	<0.025	<0.025	0.906	<0.025	NS	182	182
TMBs combined	<0.050	<0.050	3.306	<0.050	1.3821	NS	NS
Xylenes	<0.050	<0.050	0.972	<0.050	3.96	260	260
<b>Shallow Soil (Industrial) Multiple Contaminant Cumulative<sup>(5)</sup></b>							
Cancer Risk (CCR)	5.9E-09	1.3E-08	1.8E-07	3.8E-09	NR 720.12 CCR Threshold=1E-5		
Hazard Index (HI)	0.0037	0.0003	0.008	0.0124	NR 720.12 HI Threshold=1		

TABLE 4

LOADING DOCK AREA RESIDUAL SOIL ANALYTICAL RESULTS (DECEMBER 2001 AND JUNE 2009)

Group/Substance/CCR-HI	Concentration (mg/kg) for Metals/PAHs/VOCs				NR 720 RCL (mg/kg)			
	Sample ID	SS-8	SS-9	SB-1	SB-1	Soil to Groundwater Pathway	Non-Industrial Direct Contact	Industrial Direct Contact
	Sample Depth (ft bgs)	1-3	1-3	1-2	3-4			
	Sample Date	12/18/01	12/18/01	06/10/09	RQ	06/10/09	RQ	
<b>Metals</b>								
Cadmium		16.6	1.42	--	--	0.752	71.1	985
Chromium <sup>(1)</sup>		180	26.1	--	--	360000	100000	100000
<b>Polycyclic aromatic hydrocarbons (PAHs) by EPA Method 8310</b>								
Acenaphthene		<0.00496	<0.0505	<0.0515	<0.0491	NS	3590	45200
Acenaphthylene		<0.00696	<0.0709	<0.0724	<0.0690	NS	NS	NS
Anthracene		0.0115	0.13	<0.0351	<0.0334	196.9492	17900	100000
Benzo(a)Anthracene		0.0137	0.187	0.0707 J	<0.0428	NS	1.14	20.8
Benzo(a)Pyrene		0.00712	0.0835	0.0779 J	<0.0240	0.47	0.115	2.11
Benzo(b)Fluoranthene		0.0118	0.13	0.0994	<0.0219	0.4793	1.15	21.1
Benzo(ghi)Perylene		0.00681	0.0491	0.0557 J	<0.0303	NS	NS	NS
Benzo(k)Fluoranthene		<0.00222	0.0408	0.0496 J	<0.0418	NS	11.5	211
Chrysene		0.0214	0.238	0.102	<0.0240	0.1446	115	2110
Dibenzo(a,h)Anthracene		<0.00148	<0.015	<0.0296	<0.0282	NS	0.115	2.11
Fluoranthene		0.0432	0.533	0.216	<0.0272	88.8778	2390	30100
Fluorene		0.00691	0.0525	<0.0362	<0.0345	14.8299	2390	30100
Indeno(1,2,3-cd)Pyrene		<0.00169	0.0306	0.0672 J	<0.0230	NS	1.15	21.1
1-Methyl Naphthalene		0.00392	<0.0376	<0.0406 L	<0.0387 L	NS	17.6	72.7
2-Methyl Naphthalene		0.00564	<0.044	<0.0450 L	<0.0428 L	NS	239	3010
Naphthalene <sup>(2)</sup>		0.00467	0.0286	<0.0504 L	<0.0481	0.6582	5.52	24.1
Phenanthrene		0.00472	0.359	0.159	<0.0428	NS	NS	NS
Pyrene		0.0304	0.398	0.257	<0.0295	54.5455	1790	22600
<b>Detected volatile organic compounds (VOCs) by EPA Method 8021</b>								
n-Butylbenzene		<0.025	0.0272	--	--	NS	108	108
sec-Butylbenzene		<0.025	<0.025	--	--	NS	145	145
1,1-Dichloroethane		<0.025	<0.025	<0.0318	<0.0336	0.4834	5.06	22.2
Ethylbenzene		<0.025	0.048	--	--	1.57	8.02	35.4
p-Isopropyltoluene		<0.025	<0.025	--	--	NS	162	162
Methylene Chloride <sup>(3)</sup>		<0.025	<0.025	--	--	0.0026	61.8	1150
Naphthalene <sup>(4)</sup>		<0.025	0.051	--	--	0.6582	5.52	24.1
n-Propylbenzene		<0.025	<0.025	--	--	NS	264	264
Tetrachloroethylene		<0.025	<0.025	<0.0297	<0.0314	0.0045	33	145
Toluene		<0.025	0.0813	<0.0435	<0.0459	1.1072	818	818
1,1,1-Trichloroethane		<0.025	<0.025	<0.023	<0.0235	0.1402	640	640
Trichloroethylene		<0.025	<0.025	<0.0307	<0.0325	0.0036	1.3	8.41
Trichlorofluoromethane		<0.025	<0.025	--	--	4.4775	1230	1230
1,2,4-Trimethylbenzene		<0.025	<0.025	--	--	NS	219	219
1,3,5-Trimethylbenzene		<0.025	<0.025	--	--	NS	182	182
TMBs combined		<0.050	<0.050	--	--	1.3821	NS	NS
Xylenes		<0.050	<0.0691	<0.106	<0.112	3.96	260	260
<b>Shallow Soil (Industrial) Multiple Contaminant Cumulative<sup>(5)</sup></b>								
Cancer Risk (CCR)		6.4E-09	6.0E-08	4.8E-08	--	NR 720.12 CCR Threshold=1E-5		
Hazard Index (HI)		0.0169	0.0019	0.0004	--	NR 720.12 HI Threshold=1		

TABLE 4

LOADING DOCK AREA RESIDUAL SOIL ANALYTICAL RESULTS (DECEMBER 2001 AND JUNE 2009)

NOTES:

Concentrations and NR 720 RCLs are in milligrams per kilogram (mg/kg) on a dry-weight basis.

Detected concentrations at or above an applicable NR 720 industrial direct contact RCL are in bold, red font.

Detected concentrations at or above an applicable NR 720 residential direct contact RCL are in red font.

Detected concentrations at or above an applicable NR 720 soil to groundwater pathway RCL are italicized.

NR 720 residual contaminant level (RCL) concentrations from WDNR's RR Program Soil RCL Excel workbook updated March 2016.

Sample depths are in feet below ground surface (ft bgs) at the time of collection.

EB = Excavation base sample.

J = Estimated concentration below laboratory quantitation level.

L = Laboratory control sample exhibited a low bias. Sample results may also be biased low.

NS = No standard.

PB = Pile base sample collected from residual at former location of stockpiled impacted soil after it was hauled away for disposal.

RQ = Results qualifier.

SS = Sidewall sample.

TMBs (combined) = Trimethylbenzenes (1,2,4- and 1,3,5- combined).

-- = Not applicable and/or negligible for CCR and/or HI levels, as shown.

FOOTNOTES:

(1) Sample concentrations and the Soil to GW RCL are for total chromium; the direct contact RCLs are for trivalent chromium.

(2) See VOC group results for naphthalene concentration measured using EPA Method 8021 for VOCs. If naphthalene was detected using both methods, then the maximum of the two detected concentrations was used to compute CCR and HI levels.

(3) Likely a laboratory contaminant.

(4) See PAH group results for naphthalene concentration measured using EPA Method 8310 for PAHs. If naphthalene was detected using both methods, then the maximum of the two detected concentrations was used to compute CCR and HI levels.

(5) Industrial multiple contaminant cumulative cancer risk (CCR) and hazard index (HI) levels, if applicable (for samples within 4 feet of ground surface and based on detected concentrations only). Thresholds are 1E-5 for CCR and 1 for HI per NR 720.12(1)(b). No CCR or HI levels at or above their respective threshold were calculated.

**APPENDIX A**

**VERIFICATION OF ZONING FOR CITY OF EAU CLAIRE PARCEL #16-0429**

## Wright, Clifford C.

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**From:** Ryan Petrie <Ryan.Petrie@EauClaireWi.Gov>  
**Sent:** Friday, March 17, 2017 11:01 AM  
**To:** Wright, Clifford C.  
**Subject:** RE: Request for Verification of Zoning 3/17/17  
**Attachments:** National Presto.pdf

Cliff, per your request, the zoning for National Presto is I-2 (Heavy Industrial) and I have attached an official zoning map for the property and the surrounding area. If you have any questions, please let me know. Thanks.

Ryan Petrie  
Associate Planner  
City of Eau Claire  
715-839-4914



---

**From:** Wright, Clifford C. [mailto:cwright@GFNET.com]  
**Sent:** Friday, March 17, 2017 10:29 AM  
**To:** Ryan Petrie  
**Subject:** Request for Verification of Zoning 3/17/17

Ryan- On behalf of National Presto Industries (NPI) at 3925 N Hasting Way, please provide Gannett Fleming, Inc. with documentation (e.g., official zoning map or email from your department) that Parcel #16-0429 is zoned industrial, as you and I recently discussed.

**Cliff Wright, PE, PG** | Project Engineer/Geologist  
**Gannett Fleming, Inc.** | 8025 Excelsior Drive, Madison, WI 53717-1900  
t 608.836.1500 x6722 | c 608.695.3651 | [cwright@gfnet.com](mailto:cwright@gfnet.com)

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**Gannett Fleming is ISO 9001:2008 Certified.**

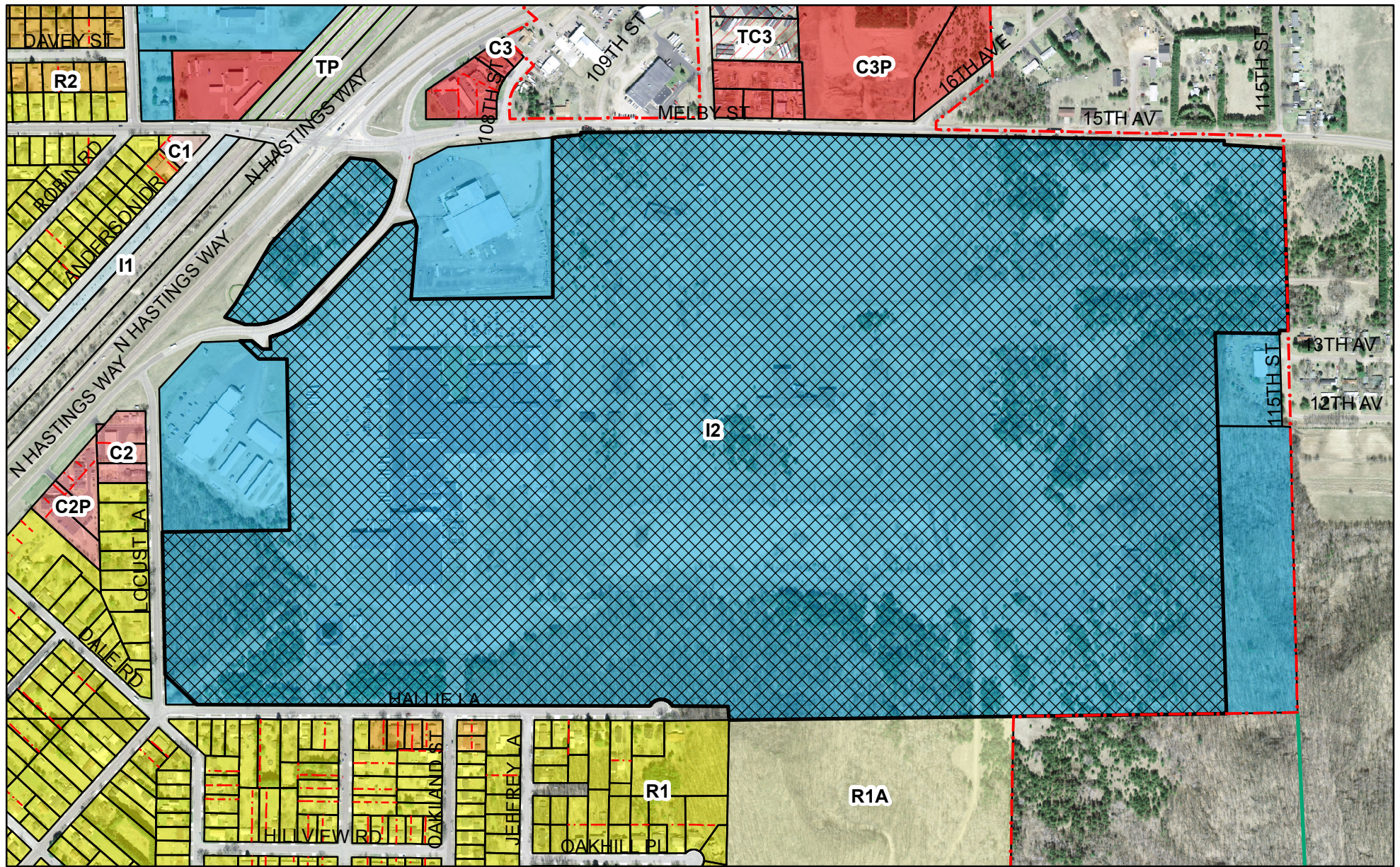
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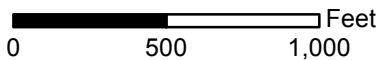
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# National Presto Industries 3925 N Hastings Way I-2 (Heavy Industrial)



- - - City Limits
- XXXXXX Subject Property



**APPENDIX B**

**OCTOBER 1999 AND NOVEMBER 2000 EMAILS FROM GEORGE MICKELSON (WDNR)  
AND JUNE 2009 EMAIL FROM MAE WILLKOM (WDNR)**



**From:** Mickelson, George M <MickeG@mail01.dnr.state.wi.us>  
**To:** 'Mike Bellot [USEPA reg 5]' <bellot.michael@epamail.epa.gov>  
**Cc:** Willkom, Mae <WillkM@mail01.dnr.state.wi.us>; Gordon, Mark E <GordoM@mail01.dnr.state.wi.us>; Evans, Bill J <EvansW@mail01.dnr.state.wi.us>; 'Dave Olig [Eder]' <dolig@gfnet.com>; Thon, Stephen F <ThonS@mail01.dnr.state.wi.us>  
**Date:** Friday, October 15, 1999 12:58 PM  
**Subject:** Presto

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Mike,

I suggest you forward this e-mail to Larry, so he can print this to put in your case file.

As we discussed, our procedure is to run sites past our West Central Region Closure Committee before we make no further action determinations. We did that yesterday (Oct 14, 99). Since this site is an EPA lead Superfund site, we did not "close" the parts of Presto under consideration, we are only making recommendations. We will leave final closure decisions to EPA.

I only prepared a short summary for each location in this e-mail, refer to the ROD signed 15 May 1996 for additional details for each location, except the SW corner that is not cited in the ROD.

Presto Site (DNR Site Number 05-09-115355, Chippewa Co.), Dry Well 5. The dry well is approximately 5 feet in diameter. Soil and dry well sediments were excavated and a single confirmation soil sample was collected after excavation. According to the closure forms, the consultant tested for VOCs, PAHs, metals and PCBs. Of these compounds, the VOCs and PAHs were not at or above the detection limit. PCBs were at 0.0162 mg/kg (ppm) and are not an issue. Of the metals, arsenic was the only metal that exceeded our state soil standards, however the results of background samples indicate that the arsenic in the confirmation sample is background and therefore arsenic is not an issue. Based on the information provided to the DNR in the closure forms, the DNR WCR Closure Committee determined that if the EPA determines that no additional soil remediation needs to be performed, DNR will not object.

Presto Site (DNR Site Number 05-09-115355, Chippewa Co.), Dry Well 2. The original plan was to excavate dry well sediments to the dry well floor and excavate soil outside of the dry well on one side. Then, connect a blank pipe to pipes terminating within the dry well, and backfill the dry well with inert material. After excavation started, the consultant determined that there was no dry well floor, it was unsafe to enter the dry well for further work, and that the wall of the dry well would be undermined by further excavation. The cover of the dry well was removed, and additional

dry well sediments, underlying soils, part of the wall of the dry well, and several hundred cubic yards of soil outside of the dry well were excavated. Eight confirmation soil samples and two soil samples collected prior to completion of excavation indicated that lead and arsenic were the only parameters that exceed NR 720 criteria. As at dry well 5, arsenic is similar to background and is therefore not a concern. Lead levels in one sample (DW-2-B1(1), collected June 5, 1998) are at 101 mg/kg (ppm), which is between Wisconsin NR 720 non-industrial and industrial cleanup standards. Those lead standards in NR 720 are based on the direct contact pathway. All other parameters appear to meet NR 720 standards based on the data in the closure forms. Based on the information provided to the DNR, the DNR WCR Closure Committee determined that if the EPA determines that no additional soil remediation needs to be performed, DNR will not object. Because lead levels (direct contact pathway) in soil exceed the NR 720 soil standards for non-industrial locations, DNR recommends that EPA require an appropriate deed instrument for this area. It is not clear from the closure forms if the soil represented by sample number DW-2-B1(1) (collected June 5, 1998) was excavated or if soil represented by that sample remains at the site. If the consultant later provides documentation to the DNR on the depth of excavation and depth of that soil sample, we may be willing to drop our recommendation for a deed instrument at Dry Well 2.

Presto Site (DNR Site Number 05-09-115355, Chippewa Co.), East Disposal Site. This area is commonly believed to be the source of the ground water contamination in Plume Number 5. That plume contaminated several off-of-property private wells, those private wells are no longer in service. No source area ground water remedy has been implemented, and it is not clear from the information provided by the consultant whether or not the ground water contamination from this area is captured by the Melby Road Disposal site ground water extraction system or if the ground water flows northward to Lake Hallie. Soil was excavated from the East Disposal site and confirmation samples collected. After soil excavation was completed, DNR, EPA and Weston personnel collected soil samples with a hand auger and field screened those samples with the consultant's field FID. Several samples from different locations exhibited high head space readings. After that site inspection, the consultant collected additional soil samples with a hand auger, backfilled the excavation, and collected additional soil samples with a drilling rig. In addition, the consultant installed two water table monitoring wells downgradient of the excavation. The DNR previously recommended several months of soil venting in this area and the RP chose not to do so. Of the soil samples, there appear to be three parameters that remain an issue, PCBs/Aroclor 1260 at up to 5.05 mg/kg (ppm), TCE at up to 256 ug/kg (ppb), and 1,2,4 trimethylbenzenes at up to 25,500 ug/kg (ppb). Of these, we believe that the PCB results of 5.05 mg/kg met the federal standards as of the date the ROD was signed (as discussed by George Mickelson and Mike Bellot by phone), although the current federal standard for PCBs for unrestricted use is 1 mg/kg. NR 720 does not have a TCE numerical standard and the consultant has proposed to use monitoring wells to demonstrate that the TCE in soil will not contaminate ground water above NR 140 standards. Based on the sampling history of MW-72 (one of the new

monitoring wells), TCE contamination in ground water at the East Disposal Site remains between the NR 140 PAL and ES at this time, but has exceeded the ES in the past. The highest trimethylbenzene soil sample result at 25,500 mg/kg is quite significant, however the first two rounds of ground water samples from MW-72 were non-detect for trimethylbenzenes. Based on the information provided to the DNR in the closure forms, the DNR WCR Closure Committee determined that if the EPA determines that no additional soil remediation needs to be performed, DNR will not object. DNR recommends that an appropriate deed instrument be used due to remaining PCB (Aroclor 1260), TCE and TMB contamination in soil. Also, for this reason DNR recommends that a deed restriction be used to maintain non-residential use on this part of the property. DNR also recommends that monitoring wells MW-72 and MW-73 stay on the list for continued water sampling. In the event that the NR 140 ES is exceeded in MW-72 or MW-73 in the future, the DNR reserves the right to change the above conclusions and may recommend additional soil remediation.

Presto Site (DNR Site Number 05-09-115355, Chippewa Co.), Southwest Corner. [The closure committee previously reviewed this part of the property. I only describe this part of the site in this e-mail to consolidate DNR's decisions in a single correspondence.] This part of the site was identified during a meeting between EPA, DNR, Presto, and the consultant when Mike Bellot (EPA) reviewed an air photo and identified the possibility that additional waste materials may exist in that area. After further inspection of the area by the EPA and DNR, the agencies determined that there was a thin veneer of waste forge compound of up to a few inches in thickness covering some of the ground surface in this area, and that further excavation in this area was warranted. Some, but not all of the waste forge compound in this area was later excavated, and remaining waste forge compound on the ground surface was sampled. The principle concern of the DNR was the PAH direct contact pathway. The results of the remaining waste forge compound samples indicated that the PAH levels were lower than the direct contact pathway criteria in the DNR PAH guidance. Thus, the DNR WCR Closure Committee determined that if the EPA determines that no additional soil remediation needs to be performed, DNR will not object.

When we have our "transition" meeting, I suggest that we discuss the following parts of the site to ascertain that DNR and EPA are on the same wavelength:

Lagoon 1.

East Extension of Lagoon 1.

Drainage Ditch 3.

Criteria for the Melby Road SVE system.

Criteria for determining when the Melby Road Ground Water Extraction System can be shut down.

Criteria for determining when the Lagoon One Ground Water Extraction System can be shut down.

Criteria for continued operation of the water treatment system at the Eau Claire Municipal Well Field.

I want to make sure that the new EPA RPM is understands any remaining issues at those locations.

George Mickelson  
Wisconsin DNR  
(608) 267-0858  
Fax (608) 267-7646  
[mickeg@dnr.state.wi.us](mailto:mickeg@dnr.state.wi.us)

**From:** Mickelson, George M <MickeG@mail01.dnr.state.wi.us>  
**To:** 'Dennis Kugle [Eder]' <dkugle@gfnet.com>  
**Cc:** 'Cliff Wright [Eder]' <cwright@gfnet.com>; 'Sheri Bianchin [EPA Reg 5]' <Bianchin.Sheri@epamail.epa.gov>; 'Om Patel [Weston]' <patelo@mail.rfweston.com>; Thon, Stephen F <ThonS@mail01.dnr.state.wi.us>; Evans, Bill J <EvansW@mail01.dnr.state.wi.us>; Joseph, Doug P <JosepD@mail01.dnr.state.wi.us>; Boettcher, Jim E <BoettJ@mail01.dnr.state.wi.us>; Gordon, Mark E <GordoM@mail01.dnr.state.wi.us>; Brumberg, Loren A <BrumbL@mail01.dnr.state.wi.us>  
**Date:** Friday, November 03, 2000 2:25 PM  
**Subject:** Presto

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Derrick Paul and Dennis Kugle,

As you know, Superfund sites are closed with the entire site being closed all at one time.

I however have wanted to make area specific DNR closure decisions when the time appears to be appropriate and document those decisions via the DNR WCR Closure Committee process. Quite simply that is because it is logical to make those decisions when the topic is fresh in our minds and also if the Closure Committee determines that any further work is required, there is a lot of time to do that additional work instead of waiting until the last minute. Thus, on a regular basis for this site, I have requested closure packages from Gannet Flemming.

Please note that decisions made by the DNR WCR Closure Committee are not EPA decisions, they are only DNR decisions. I however have not asked for closure forms when I suspected that the EPA may feel that additional action may be required, so I suspect that EPA will agree with the DNR WCR Closure Committee decisions at a later date when EPA reviews the case for closure.

I took the Drainage Ditch Number 3 closure request package prepared by Gannet Flemming dated August 21, 2000 to a special meeting of the DNR WCR Closure Committee on September 27, 2000. Jim Boetcher was unable to attend that meeting, but there were an adequate number of committee members present to make a decision. Since Cliff prepared the package, I am copying Cliff on this e-mail.

While at that meeting, I also attempted to get Closure Committee approval on Lagoon 1 and East Extension of Lagoon 1 because data from these areas have not yet been reviewed by the WCR closure committee. I did not ask for closure packages for Lagoon 1 or the East Extension, instead I put together data packages for the Closure Committee to review that I assumed would suffice.

And since we are at a critical decision stage on Lagoon 2 (do we or do we not conduct more investigation and/or remediation?) I also asked the Closure Committee for advice on Lagoon 2.

The decisions of the DNR WCR Closure Committee on September 27, 2000 are as

follows:

PRESTO SITE (DNR Site Number 05-09-115355, Chippewa Co.), DRAINAGE DITCH NUMBER 3:

This part of the site had waste forge compound and also had soils contaminated with metals. That contaminated material was excavated during and soon after June 1998. Originally, Eder developed site specific standards for TCE according to procedures in NR 720, but those site specific standards were more stringent than desired. So, Eder then proposed to monitor ground water downgradient of the ditch for a period of time after the excavation was completed to demonstrate that post-excavation soils that remained in place did not cause a TCE ground water problem.

Based on the data that was provided which included downgradient monitoring well data, it was the determination of the Closure Committee that if the EPA chooses to require no further action at Drainage Ditch Number 3, the DNR will concur with that decision. It also was the decision of the Closure Committee that if this was a non-superfund site, a closure letter would be sent that would note that there is residual lead contamination in soil that exceeds 50 mg/kg.

If this was a typical non-superfund site, a closure letter would be prepared and forwarded to Derrick documenting the above. But since this is a superfund site and no formal closure decision has been made according to superfund procedures, a closure letter will not be prepared at this time. This e-mail is the only documentation on the DNR WCR Closure Committee decision for Drainage Ditch 3. You may want to print a copy of this e-mail for your files. Since Derrick does not have e-mail, I will print a hard copy of this e-mail and mail it to Derrick.

Although the DNR has made the above decision to require no additional work at Drainage Ditch Number 3, please do not propose to abandon any monitoring wells at this time. Instead if you determine that some wells can be abandoned based on this decision, please propose that as part of the next annual ground water report.

PRESTO SITE (DNR Site Number 05-09-115355, Chippewa Co.), LAGOON 1:

The Closure Committee determined that a closure package needs to be prepared for this area. It also was the Closure Committee's decision that all pathways must be addressed in the closure package. The package that I prepared did not have any data on the potential for the direct contact pathway for PAHs, thus Lagoon 1 did not get a positive decision from the Closure Committee.

Please put together a closure package for this area that includes all pertinent data, including any direct contact pathway data that you have for PAHs and metals. If you determine that you do not have sufficient data on the direct contact pathway, you may determine that additional sampling for PAHs and/or other parameters is necessary. If so, you may want to prepare a brief sampling plan to collect such data for our review. As in the past, the DNR has a preference for the DNR PAH soil methods instead of CLP methods, so if any additional sampling is performed for PAHs, please keep that in mind.

When you prepare that closure package, you should also include

contaminant data from monitoring wells that are downgradient of Lagoon 1 and the extraction well that captures from that area, as the ground water pathway will also have to be considered for that closure decision.

Your August 18, 2000 submittal included a graph for TCE in monitoring well MW-70A with a curve representing a single exponential decay rate based on the data presented. Upon simple inspection of the graph, it is readily apparent that there are two different trends that appear to be pre-remedial and post-remedial instead of one single trend throughout. You may want to have that graph replotted for the closure package with separate pre-remedial and post-remedial trends calculated. If you have any pre-1994 data for that well, please also include that data. (In the future, please provide at least three significant digits for ALL parameters on any such trend plots, that MW-70A graph has a formula of  $y=40105e^{-0.0002x}$ , thus that formula mixes a number with five significant digits and a number with one significant digit.) I would also suggest that you submit graphs at both the linear scale (such as the one plotted) and at a semi-log scale with the contaminant concentrations on the log scale. The semi-log graph should range from 0.1 ug/L to 100 ug/L, but if you plot any such graphs for any wells with concentrations that exceeded 100 ug/L, the range should of course be expanded.

Some of the previous water table maps for the extraction wells near Lagoon 1 suggest that one of the extraction wells does not have a cone of depression, when it clearly should. Please make sure that future water table maps in this area include the data necessary to show a cone of depression at ALL extraction wells that were in use at that time.

Also, please contact Steve Thon in the DNR Eau Claire office to determine if Steve needs any submittals for abandonment of a wastewater lagoon as specified in NR 213.07, or if he will instead accept documentation from the DNR WCR Closure Committee as a substitute. I am copying this e-mail to Steve.

#### PRESTO SITE (DNR Site Number 05-09-115355, Chippewa Co.), EAST EXTENSION OF LAGOON 1:

The closure committee requires a closure package on this area. The issues are the same as Lagoon 1 (above), except that the above discussion on MW-70A and the extraction wells is clearly associated with Lagoon 1 alone.

#### PRESTO SITE (DNR Site Number 05-09-115355, Chippewa Co.), LAGOON 2:

As of the time of the closure meeting, it had not yet been determined by EPA and DNR if you need to do more remediation in this area. Because it was yet unresolved, I did not propose to the Closure Committee that this area require no further work. Instead I requested input from the committee on how to proceed.

The committee did not focus on the small area at the west end of the lagoon where the waste forge compound was initially discovered, instead the committee looked at the bigger picture. The committee was concerned that a large mass of waste forge compound was found to exist in Lagoon 2 when the lagoon was originally assumed to be "clean" based on extremely limited sampling that was conducted prior to preparing the original RI. I have not reviewed the site investigation report in detail, but it is my understanding that only two sample locations were selected in Lagoon 2 for the RI based on

a map I reviewed from that initial RI report. Lagoon 2 is a fairly large area for only two sample locations. In light of the discovery of the waste forge compound in Lagoon 2, I suggest that you review all data for Lagoon 2 (including data collected prior to completion of the RI report) and either propose a justification for no additional sampling over the rest of Lagoon 2 OR prepare a sampling plan for additional sampling. To put it in other words, you have the burden to convince the DNR WCR Closure Committee that there is no further undiscovered contamination in Lagoon 2.

The closure committee also determined that additional detailed sampling is necessary to define the extent of the known waste forge compound lens on the west end of the lagoon. That would include sampling of that lens to determine composition so that it can be determined if it needs to be excavated. Without additional data on extent and composition, we cannot make a determination on the whether or not additional excavation will be necessary. A brief workplan for such sampling should be prepared and submitted. Note that when I visited the site prior to backfilling the Lagoon, I discussed with Derrick Paul the importance of knowing exactly where the excavation boundary was, as once it was backfilled it would be difficult to know the exact location of the boundary. I trust that Derrick has had detailed maps prepared, the excavation boundary staked, or other means are available to determine the former excavation location.

When you contact Steve Thon on NR 213.07 issues associated with Lagoon 1 and the East Extension, you should also discuss Lagoon 2 with him to determine if he needs any documentation on Lagoon 2.

To summarize the above:

Drainage Ditch 3 - no further action determination by WCR DNR Closure Committee.

Lagoon 1 - submit closure request forms or possibly a workplan for additional sampling if you feel it is necessary to prepare a closure request.

East Extension of Lagoon 1 - submit closure request forms or possibly a workplan for additional sampling if you feel it is necessary to prepare a closure request.

Lagoon 2 - submit workplan for additional sampling.

As far as I can tell, the above lists all of the remaining "soil" parts of the Presto site, excluding the Melby Road SVE system. I previously ran the SW Corner, Dry Well 2, Dry Well 5 and East Disposal parts of the site through the Closure Committee and documented those decisions in an e-mail to Mike Bellot that was copied to Dave Olig on October 15, 1999. So, those other areas that had soil contamination have already been resolved from a DNR perspective.

If you have any questions on this e-mail, please give me a ring.

-----  
GEORGE MICKELSON  
Wisconsin DNR, Mail Code RR/3  
101 S. Webster St. - - - 53703



P.O. Box 7921 - - - 53707-7921  
Madison, WI  
(608) 267-0858 Fax (608) 267-7646  
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This e-mail and any attachment contains information which is  
private and confidential and is intended for the addressee only.  
If you are not an addressee, you are not authorized to read, copy  
or use the e-mail or any attachment. If you have received this e-mail  
in error, please notify the sender by return e-mail and then destroy it.  
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**Olig, David J.**

**From:** Willkom, Mae - DNR [Mae.Willkom@Wisconsin.gov]  
**Sent:** Thursday, June 04, 2009 2:30 PM  
**To:** Olig, David J.  
**Cc:** Caine.Howard@epamail.epa.gov  
**Subject:** NPI - No Further Action Request for Loading Dock Area

I have reviewed the No Further Remedial Action Request submitted to the WDNR by Gannett Fleming on behalf of NPI for the Loading Dock Area. The report is dated April 8, 2009. On May 14, 2009, I presented the work to the Department of Natural Resources WCR remediation program case closeout committee.


It is my understanding that soils contaminated with waste forge compound were discovered in 2001 during the construction of an access road and asphalt apron adjacent to the loading dock area, north of the former Lagoon # 1. Three successive excavations were conducted to depths of 2 to 5 feet, and confirmation samples were collected for VOCs, PAHs, and metals. Nine sidewall samples and six bottom samples were collected from the final excavation, and the area was backfilled with clean soil.

Sidewall samples SS-1 and SS-3, located on the north edge of the final excavation, and bottom samples EB-3 and EB-5 exceeded generic *industrial* residual contaminant levels (RCLs) for PAHs (direct contact pathway). The adjacent access road presented a structural impediment to further excavation, and at least one sample should be collected north of the road to confirm that contaminated soils do not extend beyond it. The Department will require a deed instrument for maintenance of a two-foot soil cover (at a minimum) or additional asphalt over any areas which exceed *industrial* soil standards. In addition, the deed instrument will require additional investigation and possible excavation when and if the access road is ever removed.

Bottom samples EB-2 and EB-6, and sidewall samples SS-6, SS-7 and SS-8 exceed NR 720 *non-industrial* direct contact standards for cadmium and/or NR 720 direct contact standards for 1,1-dichloroethane. The Department will require a deed instrument for maintenance of the existing soil cover (at a minimum) or additional asphalt over these areas, including the area between the southern extent of the December, 2001 excavation and the northern extent of the previous excavation conducted at former Lagoon # 1. In the alternative, a deed instrument for maintenance of *industrial* zoning, rather than for cover maintenance in these areas, could be recorded; however, other areas which exceed *industrial* RCLs would still require maintenance of a cover, as stated above.

Samples PB-1, PB-3 and PB-5, exceed generic non-industrial RCLs for PAHs (direct contact pathway) and/or NR 720 non-industrial direct contact standards for cadmium. These samples were reportedly collected at the ground surface in the area of a former stockpile. The Department will require either additional excavation of these areas, or installation of a minimum two-foot soil cover (or asphalt), together with a deed instrument for cover maintenance. In the alternative, a deed instrument for maintenance of *industrial* zoning, rather than for cover maintenance in these areas, could be recorded; however, other areas which exceed *industrial* RCLs would still require maintenance of a cover, as stated above.

Upon completion of the additional work and/or deed instrument(s) listed above, I would provide the Department's response to NPI/GF's current request in a manner similar to the "no further action" e-mails from previous DNR project managers, indicating that if the USEPA determines that no further action is necessary in the identified areas, then the State would concur.

 Mae E. Willkom

Hydrogeologist

Remediation and Redevelopment

Wisconsin Department of Natural Resources

(☎) phone: (715) 839-3748

(☎) fax: (715) 839-6076

(✉) e-mail: mae.willkom@wisconsin.gov

**APPENDIX C**

**DRAFT CAP MAINTENANCE PLAN FOR THE LDA AT NPI**

**DIRECT CONTACT COVER SYSTEM MAINTENANCE PLAN (NPI LDA)**

Date: May 22, 2017

Property Located at: 3925 North Hastings Way, Eau Claire, Wisconsin, Chippewa County  
BRRTS #02-09-000267

Chippewa County Parcel ID# 22809-3440-00020000 (aka City of Eau Claire Parcel #16-0429)

**Introduction**

This document is the Maintenance Plan (MP) for a direct-contact cover system (i.e., cap) at the above referenced property (Latitude: 44.858652, Longitude: -91.452610) in accordance with the requirements of s. NR 724.13(2), Wisconsin Administrative Code. The maintenance activities relate to clean soil backfill covering soil with residual contamination in the loading dock area (LDA) at the south end of the main building at the National Presto Industries, Inc. (NPI) site. The MP applies to the designated cap area shown on Figure C-1. The cap and this MP will serve as an institutional control for the effective closeout of the LDA at the NPI site by the Wisconsin Department of Natural Resources (WDNR). Per the public land survey system, the site is located in the NE1/4 of the SE1/4 of Section 34, T28N, R09W. For more site-specific information about this property see:

- The case file in the WDNR Eau Claire service center office.
- BRRTS on the Web (the WDNR's online database of contaminated sites).
- The GIS Registry PDF file (includes information on the nature and extent of contamination).
- The WDNR project manager for the National Presto Industries (NPI) site.

**Description of Residual PAH Soil Contamination**

The polycyclic aromatic hydrocarbons (PAHs) of primary concern include benzo(a)pyrene and dibenzo(a,h)anthracene in excavation base soil sample EB-3. The perimeter of the direct-contact cover system (designated cap area) shown on Figure C-1 defines the estimated horizontal extent of impacted soil with one or more PAHs at or above an applicable NR 720 industrial direct contact residual contaminant level. The estimated vertical extent of elevated PAHs in soil is from 3.5 to 4 feet below ground surface (bgs). The depth to water in this area of the site is approximately 70 feet bgs.

**Description of the Direct Contact Cover System to be Maintained**

The cap serves as a barrier to prevent direct human contact with the residual PAH soil contamination that might otherwise pose a threat to human health. The system components include clean sand and gravel backfill placed in December 2001 and vegetated soil cover. The existing vegetated soil cover currently maintains sparse grass (due to the sandy soil and no irrigation) in a relatively flat area of the site, bordering an asphalt access road and parking apron for semi-trailers. The area is mowed as needed. Attachment A provides two representative photographs of the LDA capped area for reference.

### **Maintenance Activities and Annual Inspection**

The direct-contact cover system (i.e., clean sand and gravel backfill and vegetated soil cover) must be maintained to prevent direct contact. In the event cap repair or other activities (e.g., underground utility repair or installation) expose the underlying soil in the designated cap area, maintenance workers will be notified of the PAH impacts and directed to use appropriate personal protective equipment. If material within the extent of soil impacts is excavated, it will be sampled to determine the degree of contamination, if any. All excavated soil must be treated, stored, and disposed of in accordance with applicable local, state, and federal laws.

In the designated cap area shown on Figure C-1, the direct-contact cover system will be inspected by the property owner or its designated representative at least once a year for erosion, settling, vegetative damage, cracking, and other potential problems that can cause exposure to underlying impacted soils. Any area of erosion, settling, vegetative damage, cracking, etc. will be documented and repaired. A log of the inspections and all repairs will be maintained by the property owner; is included as Attachment B, *Continuing Obligations Inspection and Maintenance Log*; and will be available for submittal to or inspection by WDNR representatives upon their request. In addition, if problems are noted in the designated cap area at any time during the year, repairs will be scheduled as soon as practical.

### **Prohibited Activities and WDNR Notification Requirements**

The following activities, outside of those required for cap maintenance, are prohibited on the property within the area of the cap shown on Figure C-1 unless prior written approval has been obtained from the WDNR or its successor:

- Removal or replacement of the cap with another barrier or building. Any replacement cap would be subject to the same guidelines as outlined in this MP, unless indicated otherwise by the WDNR or its successor.
- Changing the use or occupancy of the property to a commercial or residential exposure setting, including single or multiple family residence, a school, day care, senior center, hospital, or similar commercial or residential exposure setting.

The property owner will:

- Notify the WDNR if any pertinent problem occurs for two or more successive inspections.
- Maintain a copy of this MP.
- Make the MP available to all interested parties (i.e., on-site employees, contractors, future property owners, etc.) for viewing upon request.
- Keep this MP up to date and revised as necessary, per NR 724.13(4).

***Gannett Fleming***

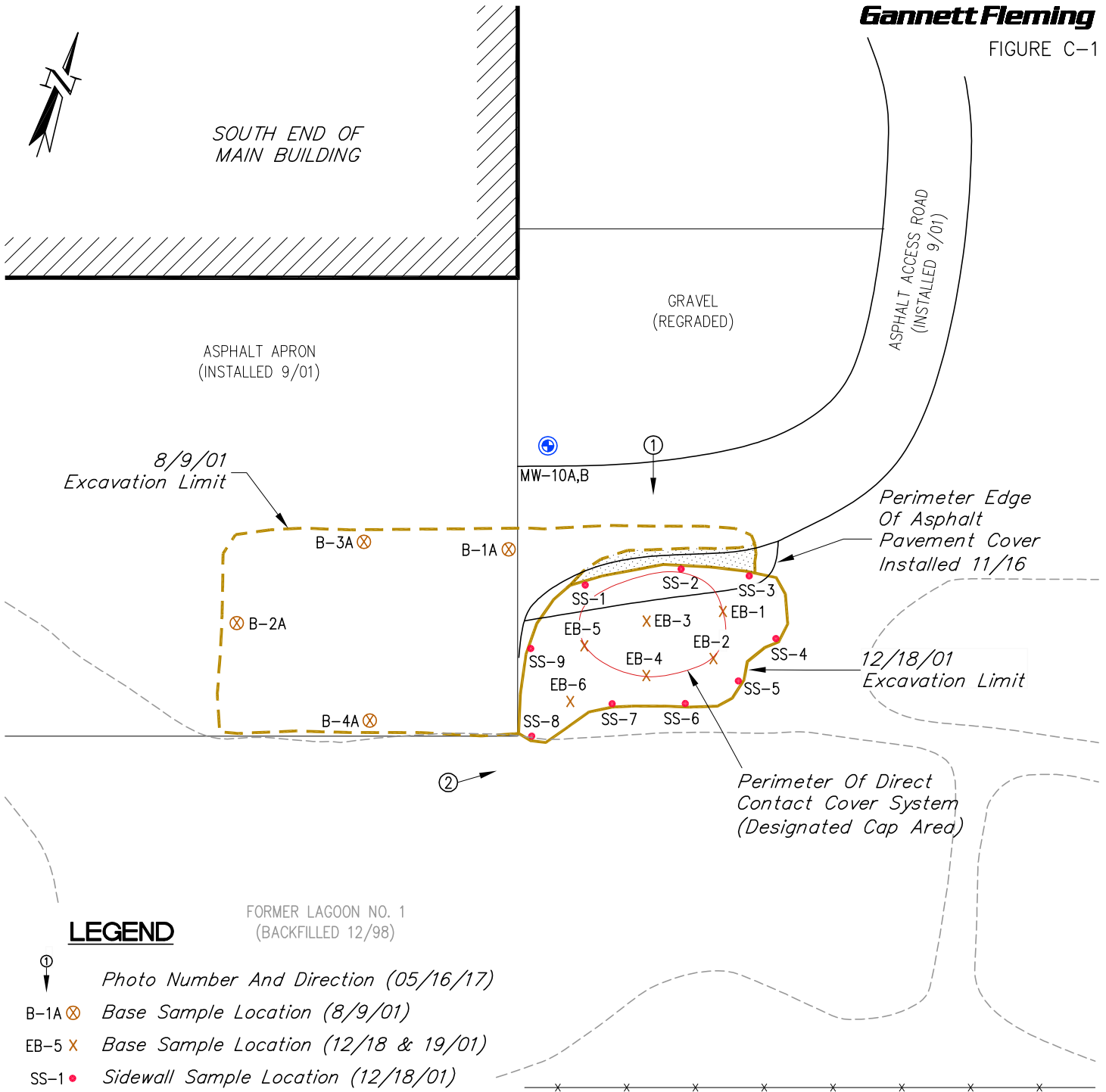
This MP can be amended or withdrawn by the property owner and its successors with the written approval of the WDNR or its successor.

**Contact Information**

Property owner: National Presto Industries, Inc.  
c/o Derrick Paul  
3925 North Hastings Way, Eau Claire, WI 54703  
(715) 839-2141

Consultant: Gannett Fleming, Inc.  
c/o Cliff Wright  
8025 Excelsior Drive, Madison, WI 53717-1900  
(608) 836-1500 ext. 6722

Project manager: Mae Willkom  
WDNR  
1300 West Clairemont Avenue, Eau Claire, WI 54701  
(715) 839-3748



**LEGEND**

- ① ↓ Photo Number And Direction (05/16/17)
- B-1A ⊗ Base Sample Location (8/9/01)
- EB-5 X Base Sample Location (12/18 & 19/01)
- SS-1 • Sidewall Sample Location (12/18/01)
- ▨ Estimated Extent Of Residual Material Left In Place
- ⊕ NPI Superfund Monitoring Well Nest (MW Prefix)



**DIRECT CONTACT COVER  
SYSTEM MAP  
(LOADING DOCK AREA)**

NATIONAL PRESTO INDUSTRIES, INC.  
EAU CLAIRE, WISCONSIN



**ATTACHMENT A**

**PHOTOGRAPHS OF THE LDA CAP (MAY 2017)**

<b>Client Name:</b> National Presto Industries, Inc. (NPI)	<b>Site Location:</b> NPI Loading Dock Area, Eau Claire, Wisconsin	<b>Project No.</b> 34283.000
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<b>Photo No.</b> 1	<b>Date:</b> 05/16/17
<p><b>Description:</b> View looking south at the asphalt patch installed in November 2016 (darker strip of asphalt on far side of access road) and vegetated soil cover of the Loading Dock Area (LDA) cap. Figure C-1 includes a symbol showing photo number and direction for reference.</p>	



<b>Photo No.</b> 2	<b>Date:</b> 05/16/17
<p><b>Description:</b> View looking east at the asphalt patch installed in November 2016 and vegetated soil cover of the LDA cap. A parked semi-trailer to the left (not pictured here, but seen in Photo No. 1 above) limited access. Figure C-1 includes a symbol showing photo number and direction for reference.</p>	



**ATTACHMENT B**

**CONTINUING OBLIGATIONS MAINTENANCE AND INSPECTION LOG**

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

Activity (Site) Name <b>National Presto Industries (LDA)</b>	BRRTS No. <b>02-09-000267</b>
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Inspections are required to be conducted (see closure approval letter):

- annually
- semi-annually
- other – specify \_\_\_\_\_

When submittal of this form is required, submit the form electronically to the DNR project manager. An electronic version of this filled out form, or a scanned version may be sent to the following email address (see closure approval letter):

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