

Source Property Information

BRRTS #:	<input type="text" value="02-46-000875"/>	CLOSURE DATE:	<input type="text" value="10/24/2016"/>
ACTIVITY NAME:	<input type="text" value="Fromm Bros Nieman & Co"/>	FID #:	<input type="text" value="246018300"/>
PROPERTY ADDRESS:	<input type="text" value="13145 N Green Bay Rd"/>	DATCP #:	<input type="text"/>
MUNICIPALITY:	<input type="text" value="Mequon"/>	PECFA#:	<input type="text" value="53092750545B"/>
PARCEL ID #:	<input type="text" value="140100300500"/>		

***WTM COORDINATES:**

X: Y:

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

WTM COORDINATES REPRESENT:

- Approximate Center Of Contaminant Source
 Approximate Source Parcel Center

Please check as appropriate: (BRRTS Action Code)

CONTINUING OBLIGATIONS

Contaminated Media for Residual Contamination:

- | | |
|--|---|
| <input checked="" type="checkbox"/> Groundwater Contamination > ES (236) | <input type="checkbox"/> Soil Contamination > *RCL or **SSRCL (232) |
| <input type="checkbox"/> Contamination in ROW | <input type="checkbox"/> Contamination in ROW |
| <input type="checkbox"/> Off-Site Contamination | <input type="checkbox"/> Off-Site Contamination |

Site Specific Obligations:

- | | |
|--|---|
| <input type="checkbox"/> Soil: maintain industrial zoning (220)
<i>(note: soil contamination concentrations
between non-industrial and industrial levels)</i> | <input checked="" type="checkbox"/> Cover or Barrier (222) |
| <input type="checkbox"/> Structural Impediment (224) | <input type="checkbox"/> Direct Contact |
| <input type="checkbox"/> Site Specific Condition (228) | <input checked="" type="checkbox"/> Soil to GW Pathway |
| | <input checked="" type="checkbox"/> Vapor Mitigation (226) |
| | <input type="checkbox"/> Maintain Liability Exemption (230)
<i>(note: local government unit or economic
development corporation was directed to
take a response action)</i> |

VAPOR: Future
Redevelopment

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

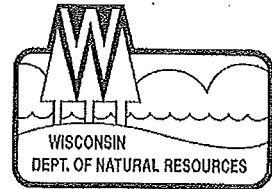
Yes No N/A

* Residual Contaminant Level

**Site Specific Residual Contaminant Level

State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
Plymouth Service Center
1155 N Pilgrim Road
Plymouth WI 53073

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



October 24, 2016

Tom Nieman
Fromm Family Foods, Inc.
13145 Green Bay Road
Mequon, WI 53092

KEEP THIS DOCUMENT WITH YOUR PROPERTY RECORDS

SUBJECT: Final Case Closure with Continuing Obligations
Fromm Bros Nieman & Co, 13145 Green Bay Road, Mequon, WI
DNR BRRTS Activity #: 02-46-000875
FID #: 246018300

Dear Mr. Nieman:

The Wisconsin Department of Natural Resources (DNR) considers Fromm Bros Nieman & Co. closed, with continuing obligations. No further investigation or remediation is required at this time. However, you, future property owners, and occupants of the property must comply with the continuing obligations as explained in the conditions of closure in this letter. Please read over this letter closely to ensure that you comply with all conditions and other on-going requirements. Provide this letter and any attachments listed at the end of this letter to anyone who purchases, rents, or leases this property from you.

This final closure decision is based on the correspondence and data provided, and is issued under Wis. Admin. §§ NR 726 and 727. The Southeast Region (SER) Closure Committee reviewed the request for closure on July 7, 2016. The Closure Committee reviewed this environmental remediation case for compliance with state laws and standards to maintain consistency in the closure of these cases. A request for remaining actions needed was issued by the DNR on August 2, 2016, which included well abandonment and updates to the electronic version of the closure/GIS package. Documentation that the conditions in that letter were met was received on August 31, 2016.

This case was opened by the DNR when chlorinated solvents, trichloroethylene (TCE) and tetrachloroethylene (PCE), were detected in groundwater during investigation of a petroleum release from the former on-site petroleum underground storage tank system. A petroleum release from this tank system was originally reported to the DNR in 1991, and was closed in 1998, following remedial soil excavations and long term groundwater monitoring. The DNR opened a new case regarding PCE and TCE groundwater contamination as an apparent separate release in 1997.

The site is currently utilized as a pet and animal food production facility. There was no documented use of PCE at the facility other than speculation that an employee may have used chlorinated solvents, containing PCE, to clean plant equipment. The source area remains unknown. If a source is identified in the future, further investigation may be needed. The response action to this PCE release included installing additional wells and conducting long-term groundwater monitoring using the additional and existing wells for the petroleum release.

The extent of the PCE-impacted groundwater is identified as being below the central portion of the building. The conditions of closure and continuing obligations required were based on the property being used for rural agricultural/commercial purposes.

Continuing Obligations

The continuing obligations for this site are summarized below. Further details on actions required are found in the section Closure Conditions.

- Groundwater contamination is present at or above Wis. Admin. § NR 140 enforcement standards.
- Pavement or a building slab cover must be maintained over contaminated soil, and the DNR must be notified and approve any changes to this barrier.
- Remaining contamination could result in vapor intrusion if future construction activities occur. Future construction includes expansion or partial removal of current buildings as well as construction of new buildings. Vapor control technologies will be required for occupied buildings, unless the property owner assesses the potential for vapor intrusion, and the DNR agrees that vapor control technologies are not needed.

The DNR fact sheet "Continuing Obligations for Environmental Protection," RR-819, helps to explain a property owner's responsibility for continuing obligations on their property. The fact sheet may be obtained at <http://dnr.wi.gov/files/PDF/pubs/rr/RR819.pdf>.

GIS Registry

This site will be included on the Bureau for Remediation and Redevelopment Tracking System (BRRTS on the Web) at <http://dnr.wi.gov/topic/Brownfields/clean.html>, to provide public notice of residual contamination and of any continuing obligations. The site can also be viewed on the Remediation and Redevelopment Sites Map (RRSM), a map view, under the Geographic Information System (GIS) Registry layer, at the same web address.

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

All site information is also on file at the Southeast Regional DNR office, at 1155 Pilgrim Road, Plymouth, Wisconsin 53073. This letter and information that was submitted with your closure request application, including the maintenance plan and maps, can be found as a Portable Document Format (PDF) in BRRTS on the Web.

Prohibited Activities

Certain activities are prohibited at closed sites because maintenance of a barrier is intended to prevent contact with any remaining contamination. When a barrier is required, the condition of closure requires notification of the DNR before making a change, in order to determine if further action is needed to maintain the protectiveness of the remedy employed. The following activities are prohibited on any portion of the property where pavement or building foundation is required, as shown on the attached map, Exhibit B, Site Plan with Slab to be Maintained, May 17, 2016, unless prior written approval has been obtained from the DNR:

- removal of the existing barrier or cover;
- replacement with another barrier or cover;

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

Closure Conditions

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

Please send written notifications in accordance with the following requirements to:

Wisconsin Department of Natural Resources
Attn: Remediation and Redevelopment Program Environmental Program Associate
2300 N. Martin Luther King Jr., Dr.
Milwaukee, WI 53212

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

Groundwater contamination greater than enforcement standards is present on this contaminated property, as shown on the attached map, Figure B.3.b, Equiconcentration Map for Tetrachloroethylene (PCE), June 20, 2016. If you intend to construct a new well, or reconstruct an existing well, you'll need prior DNR approval.

Cover or Barrier (Wis. Stats. § 292.12 (2)(a), Wis. Admin. §§ NR 726.15, 727.07)

The pavement and building slab/building that exists in the location shown on the attached map, Exhibit B, Site Plan with Slab to be Maintained, May 17, 2016, shall be maintained in compliance with the attached maintenance plan in order to minimize the infiltration of water and prevent additional groundwater contamination that would violate the groundwater quality standards in Wis. Admin. § NR 140.

The cover approved for this closure was designed to be protective for a commercial or industrial use setting. Before using the property for residential purposes, you must notify the DNR at least 45 days before taking an action, to determine if additional response actions are warranted.

A request may be made to modify or replace a cover or barrier. Before removing or replacing the cover, you must notify the DNR at least 45 days before taking an action. The replacement or modified cover or barrier must be protective of the revised use of the property, and must be approved in writing by the DNR prior to implementation. A cover or barrier for industrial land uses, or certain types of commercial land uses may not be protective if the use of the property were to change such that a residential exposure would apply. This may include, but is not limited to single or multiple family residences, a school, day care, senior center, hospital or similar settings. In addition, a cover or barrier for multi-family residential housing use may not be appropriate for use at a single family residence.

The attached maintenance plan and inspection log (DNR form 4400-305) are to be kept up-to-date and on-site. Inspections shall be conducted annually in accordance with the attached maintenance plan.

Vapor Mitigation or Evaluation (s. 292.12 (2), Wis. Stats., s. NR 726.15, s. NR 727.07, Wis. Adm. Code)
Vapor intrusion is the movement of vapors coming from volatile chemicals in the soil or groundwater, into buildings where people may breathe air contaminated by the vapors. Vapor mitigation systems are used to interrupt the pathway, thereby reducing or preventing vapors from moving into the building.

Future Concern: Chlorinated VOCs remain in groundwater below the central portion of the building, as shown on the attached map Figure B.3.b, Equiconcentration Map for Tetrachloroethylene (PCE), June 20, 2016, at levels that may be of concern for vapor intrusion in the future, depending on construction and occupancy of a building. The developed portion of the site currently includes several buildings, a parking lot, and driveways for use as a pet/animal food manufacturing facility. Therefore, before a building is constructed and/or an existing building is modified, the property owner must notify the DNR at least 45 days before the change. Vapor control technologies are required for construction of occupied buildings unless the property owner assesses the vapor pathway and DNR agrees that vapor control technologies are not needed.

General Wastewater Permits for Construction Related Dewatering Activities

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

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

In Closing

Please be aware that the case may be reopened pursuant to Wis. Admin. § NR 727.13, for any of the following situations:

- if additional information regarding site conditions indicates that contamination on or from the site poses a threat to public health, safety, or welfare or to the environment,
- if the property owner does not comply with the conditions of closure, with any deed restrictions applied to the property, or with a certificate of completion issued under Wis. Stats. § 292.15, or
- a property owner fails to maintain or comply with a continuing obligation (imposed under this closure approval letter).

The DNR appreciates your efforts to restore the environment at this site. If you have any questions regarding this closure decision or anything outlined in this letter, please contact the DNR project manager, John Feeney at 920-893-8523, or at johnm.feeney@wisconsin.gov.

Final Case Closure with Continuing Obligations
Fromm Bros Nieman & Co, 13145 Green Bay Road, Mequon, WI
DNR BRRTS Activity #: 02-46-000875
FID #: 246018300
Page 5 of 5

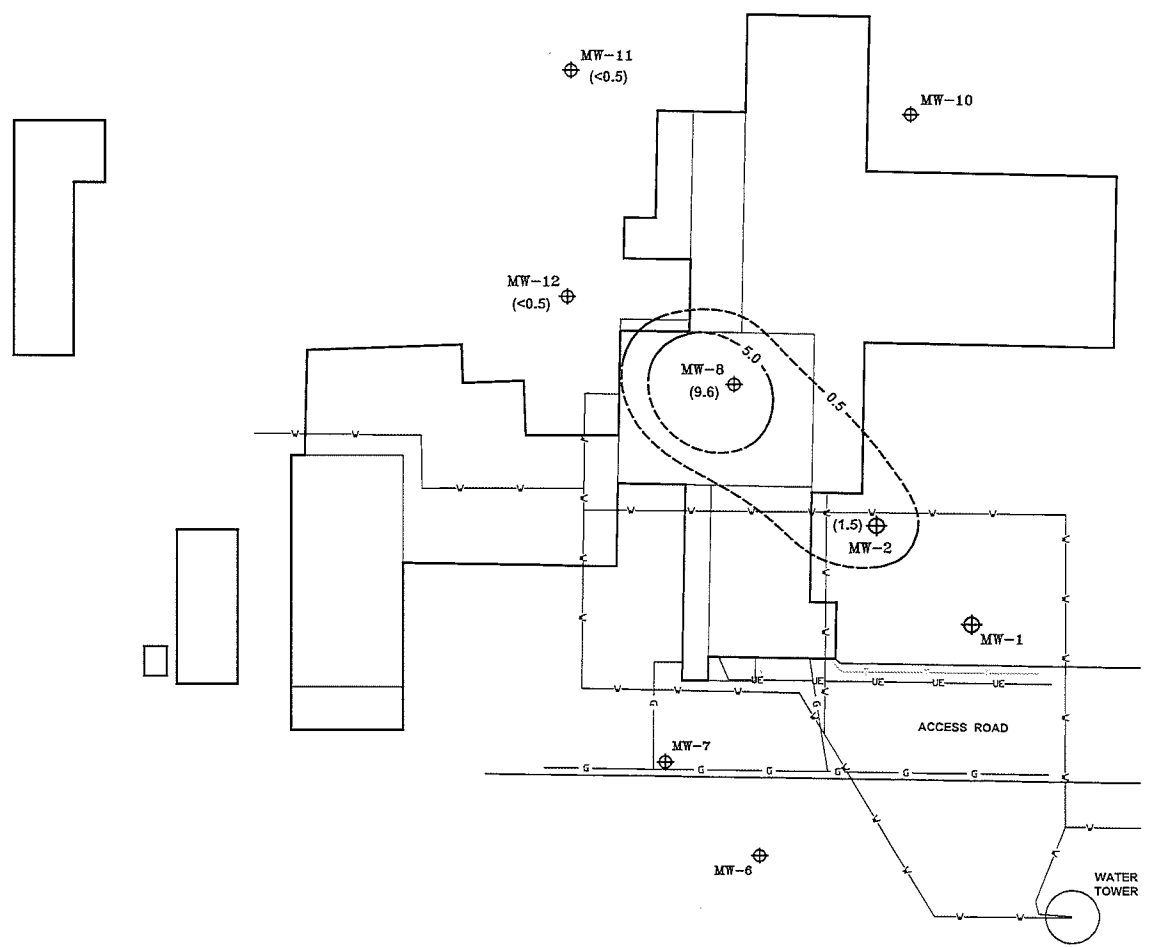
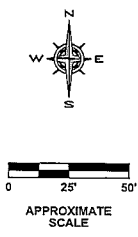
Sincerely,



Michele R. Norman
Southeast Region Team Supervisor
Remediation & Redevelopment Program

Attachments: Exhibit B, Site Plan with Slab to be Maintained, May 17, 2016
Figure B.3.b, Equiconcentration Map for Tetrachloroethylene (PCE), June 20, 2016
Cover Maintenance Plan and Inspection Log (DNR form 4400-305)

cc: Giles Engineering Associates, Inc.
SER File



LEGEND:

(9.6)	TETRACHLOROETHYLENE (PCE) CONCENTRATION IN ug/L (SAMPLED 3-29-06)
5.0	EQUICONCENTRATION CONTOUR IN ug/L FOR TETRACHLOROETHYLENE (PCE) (SAMPLED 3-29-06) (DASHED WHERE INFERRED)
	GROUNDWATER MONITORING WELL (BY ENVIRONMENTAL ASSOCIATES, INC.)
	FORMER GROUNDWATER MONITORING WELL (BY ENVIRONMENTAL ASSOCIATES, INC.)
	UNDERGROUND ELECTRIC LINE
	WATER LINE
	TELECOMMUNICATIONS LINE
	GAS LINE

GILES ENGINEERING ASSOCIATES, INC.
 N8 W22350 JOHNSON DRIVE, SUITE A1
 WAUKESHA, WI 53186 (262)544-0118

FIGURE B.3.b
 EQUICONCENTRATION MAP FOR TETRACHLOROETHYLENE (PCE)
 FROMM FAMILY FOODS
 13145 N. GREEN BAY ROAD
 MEQUON, WISCONSIN

DESIGNED	DRAWN	SCALE	DATE	REVISED
KTB	JSZ	approx. 1"=50'	06-20-16	--

PROJECT NO.: 1E-1205015 CAD No. 1E1205015I

NOTES:
 1.) ALL SITE FEATURES ARE APPROXIMATE BASED ON THE
 "ESTIMATE EXTENT OF PCE GROUNDWATER CONTAMINATION"
 DATED 4-6-06, PREPARED BY ENVIRONMENTAL ASSOCIATES, INC.

D.1 BARRIER MAINTENANCE PLAN

FROMM BROS. NIEMAN & CO
13145 Green Bay Road
Mequon, Wisconsin

BRRTs No. 02-46-000875
14-010-03-005.00

Introduction

As part of Wisconsin's geographic information system (GIS) closure requirements for this Site, residual soil contamination that *may* be present beneath the parcel must be isolated from direct human contact and infiltration of meteoric water limited. It should be noted that a specific source area for chlorinated volatile organic compounds (CVOCs), and the compound tetrachlorethylene (PCE) in particular, that is present in the groundwater at the location of monitoring well MW-8 has not been identified. The concentration of PCE in the groundwater collected from monitoring well MW-8 has been constant at approximately 8 micrograms per liter (ug/l) during four sampling events. The maximum contaminant level for PCE is 5 ug/l.

Purpose of the Barrier System

To minimize the potential for direct contact with potentially-impacted soil and to minimize the potential for the mobilization of CVOCs that may be in the soil through the infiltration of precipitation, it is recommended that the isolating building slab underlying Site Building #2 (see attached site plan) remain in place and its competency maintained.

This document is the Maintenance Plan for an engineered soil barrier system at the above-referenced property was prepared in accordance with the requirements of NR 724.13(2) of the Wisconsin Administrative Code.

The Site configuration and the location of the barrier slab to be maintained is depicted on Figure D.2.

Semi-Annual Inspection

The barrier system will be inspected for damage on a semi-annual basis and after extreme rainfall events or heavy equipment transit. Areas where contaminated soil has become or are likely to become exposed will be documented and the Site owner informed immediately. A log of the inspections and repairs will be maintained by the property owner. The format of inspection log is included as Exhibit B, *Barrier Inspection Log*. The log will include recommendations for necessary repair of any areas where underlying soil is exposed. Completed repairs will be documented in the inspection log.

Maintenance Activities

Repairs will be scheduled as soon as practical if damage to the Site barrier system is noted. Maintenance activities will include the following actions by cap/barrier system as outlined below:

1. Maintain the building and/or the building pad/slab over the known area of groundwater CVOC impact (See attached Figure D.2)

The property owner will leave concrete the building pad/slab in place should razing of the building be performed. Maintenance activities associated with the concrete pad/slab barrier will entail sealing cracks to minimize the potential for water entering the subsurface. Maintenance of the pad/slab will be necessary should the building be razed. Sealers commonly consist of tar products and cement patch materials. Assessment of these surface will be performed on an annual basis.

An inspection log which will be used to record cap damage and subsequent repair is provided as Exhibit C of this document. Photographs of the Site caps/barriers are provided in Exhibit D.

The Site owner must inform maintenance workers of the direct contact exposure hazard and provide them with appropriate personal protection equipment ("PPE") in the event that necessary maintenance activities require exposure of the underlying impacted soil.

The owner must also sample any soil that is excavated from the site prior to disposal to ascertain if contamination is present and at what concentration. The soil must be treated, stored, and disposed of by the owner in accordance with applicable local, state and federal law.

In the event that components of the barrier system are removed or replaced, the replacement barrier must be equally impervious or thick. Any replacement barrier will be subject to the same maintenance and inspection guidelines as outlined in this Maintenance Plan unless indicated otherwise by the Wisconsin Department of Natural Resources ("WDNR") or its successor.

The property owner, in order to maintain the integrity of the cap/barrier surfaces, will maintain a copy of this Maintenance Plan on site and make it available to all interested parties (i.e. on-site employees, contractors, future property owners, etc.) for viewing.

Amendment or Withdrawal of Maintenance Plan

This Maintenance Plan can only be amended or withdrawn by the property owner and their successors with the written approval of WDNR.

**Prohibition of Activities and Notification of WDNR Prior to
Actions Affecting a Cover or Cap**

The following activities are prohibited on any portion of the property where the barrier system is required as shown on the attached map unless prior written approval has been obtained from the WDNR:

- 1) Removal of the existing barrier;
- 2) Replacement with another cap/barrier;
- 3) Excavating or grading of the land surface;
- 4) Filling on capped or paved areas;
- 5) Plowing for agricultural cultivation; or
- 6) Construction or placement of a building or other structure.

Contact Information

(May 2016)

Site Owner and Operator: Fromm Bros. Nieman Co.
13145 Green Bay Road
Mequon, Wisconsin 53092
262-242-2200
Attn: Mr. Tom Nieman

Consultant: Giles Engineering Associates, Inc.
N8 W22350 Johnson Drive, Suite A1
Waukesha, Wisconsin 53186
262-544-0118
Attn: Mr. Kevin Bugel, P.G., C.P.G.

WDNR: Wisconsin Dept. of Natural Resources
Waukesha Service Center
2300 N. Martin Luther King, Jr. Drive
Milwaukee, Wisconsin 53212
Attn: Mr. John Feeney

Exhibit A – Property Legal Description

Property Legal Description:

78/359 ALSO 04.1 13.1 14.3 COMM 423 FT S & 779 FT W OF E 1/4 PST TH S 45 FT W 11 FT S
194 FT W 439 FT N 170 FT W 50 FT N 579 FT E 533 FT SE 142 FT S 554 FT POB 9.95 ACS SEC
10 T 9 R 21

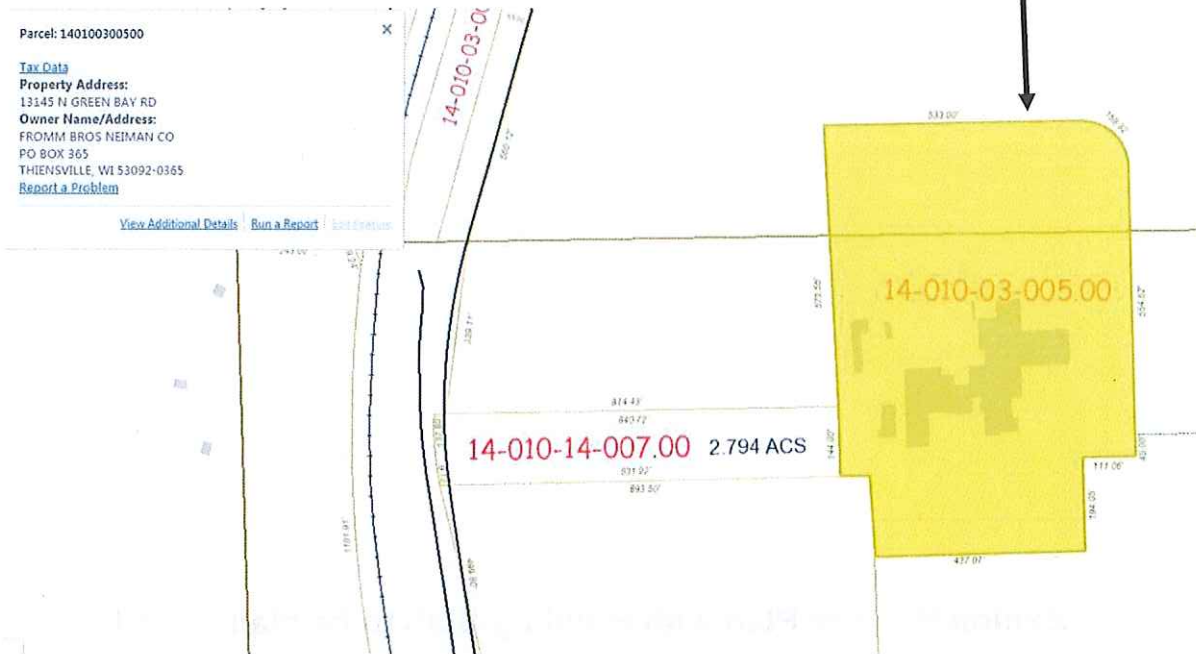
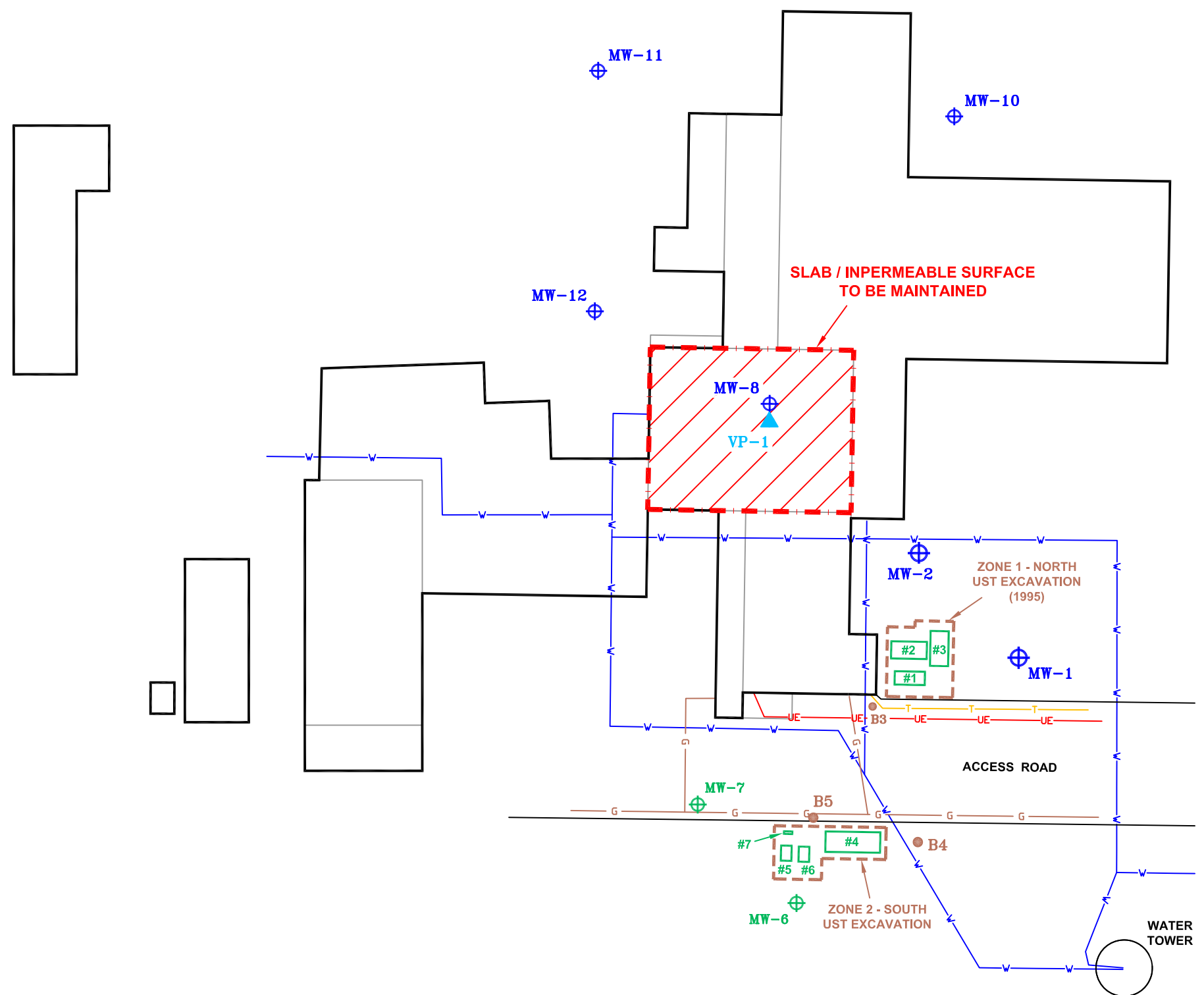
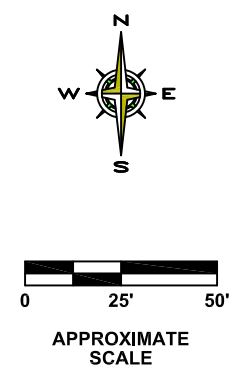


Exhibit B – Site Plan with Building Slab to be Maintained



UST INVENTORY:

#1	FORMER 2,000-GALLON DIESEL FUEL UST
#2	FORMER 4,000-GALLON HEATING OIL UST
#3	FORMER 4,000-GALLON HEATING OIL UST
#4	FORMER 8,000-GALLON GASOLINE UST
#5	FORMER 550-GALLON GASOLINE UST
#6	FORMER 550-GALLON GASOLINE UST
#7	FORMER DISPENSER ISLAND

LEGEND:

	SOIL VAPOR PROBE
	GROUNDWATER MONITORING WELL (BY ENVIRONMENTAL ASSOCIATES, INC.)
	FORMER GROUNDWATER MONITORING WELL (BY ENVIRONMENTAL ASSOCIATES, INC.)
	SOIL BORING (BY ENVIRONMENTAL ASSOCIATES, INC.)
	UNDERGROUND ELECTRIC LINE
	WATER LINE
	TELECOMMUNICATIONS LINE
	GAS LINE

GILES ENGINEERING ASSOCIATES, INC.
 N8 W22350 JOHNSON DRIVE, SUITE A1
 WAUKESHA, WI 53186 (262)544-0118

EXHIBIT B
 SITE PLAN WITH SLAB TO BE MAINTAINED
 FROMM FAMILY FOODS
 13145 N. GREEN BAY ROAD
 MEQUON, WISCONSIN

DESIGNED	DRAWN	SCALE	DATE	REVISED
KTB	JSZ	approx. 1"=50'	05-17-16	--
PROJECT NO.: 1E-1205015			CAD No. 1E1205015exB	

NOTES:
 1.) ALL SITE FEATURES ARE APPROXIMATE BASED ON THE "ESTIMATE EXTENT OF PCE GROUNDWATER CONTAMINATION" DATED 4-6-06, PREPARED BY ENVIRONMENTAL ASSOCIATES, INC.

Exhibit C – Barrier 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 FROMM BROS NIEMAN & CO	BRRTS No. 02-46-000875
---	----------------------------------

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 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 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 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 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 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

{Click to Add/Edit Image}

Date added:

Title:

{Click to Add/Edit Image}

Date added:

Title:

Feeney, John M - DNR

From: Feeney, John M - DNR
Sent: Tuesday, August 02, 2016 9:07 AM
To: 'Kevin Bugel'
Subject: RE: FROMM Closure Docs

Hi Kevin. The closure committee meeting went well. Please send me an updated CD to include the deed document, and the box checked for impervious cover for groundwater pathway. Please abandon the wells and send me the abandonment documentation.

We are committed to service excellence.

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

199 8/3/16

John Feeney
Phone: 920-893-8523
Johnm.feeney@wisconsin.gov

From: Feeney, John M - DNR
Sent: Tuesday, June 28, 2016 8:04 AM
To: 'Kevin Bugel'
Subject: RE: FROMM Closure Docs

Thanks Kevin. I think so.

We are committed to service excellence.

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

John Feeney
Phone: 920-893-8523
Johnm.feeney@wisconsin.gov

From: Kevin Bugel [<mailto:kbugel@gilesengr.com>]
Sent: Monday, June 27, 2016 4:31 PM
To: Feeney, John M - DNR
Subject: FW: FROMM Closure Docs

Hi John:

I was contacted by Fromm Foods attorney with the following Warrantee Deed that came from the Title Company. Will this suffice for the closure committee?

Kevin T. Bugel, P.G., C.P.G.
Environmental Division Manager



ENGINEERING ASSOCIATES, INC.

N8 W22350 Johnson Dr., Suite A1

SUBMIT AS UNBOUND PACKAGE IN THE ORDER SHOWN

Notice: Pursuant to ch. 292, Wis. Stats., and chs. NR 726 and 746, Wis. Adm. Code, this form is required to be completed for case closure requests. The closure of a case means that the Department of Natural Resources (DNR) has determined that no further response is required at that time based on the information that has been submitted to the DNR. All sections of this form must be completed unless otherwise directed by the Department. DNR will consider your request administratively complete when the form and all sections are completed, all attachments are included, and the applicable fees required under ch. NR 749, Wis. Adm. Code, are included, and sent to the proper destinations. Personal information collected will be used for administrative purposes and may be provided to requesters to the extent required by Wisconsin's Open Records Law (ss. 19.31 - 19.39, Wis. Stats.). Incomplete forms will be considered "administratively incomplete" and processing of the request will stop until required information is provided.

Site Information

BRRTS No. 02-46-000875	VPLE No.		
Parcel ID No. 14-010-03-005.00			
FID No. 246018300	WTM Coordinates		
	X 683307	Y 311344	
BRRTS Activity (Site) Name FROMM BROS NIEMAN & CO	WTM Coordinates Represent: <input checked="" type="checkbox"/> Source Area <input type="checkbox"/> Parcel Center		
Site Address 13145 N Green Bay Road	City Mequon	State WI	ZIP Code 53092
Acres Ready For Use	9.95		

Responsible Party (RP) Name Tom Nieman			
Company Name Fromm Family Foods, Inc.			
Mailing Address 13145 Green Bay Road	City Mequon	State WI	ZIP Code 53092
Phone Number (262) 242-2200	Email		

Check here if the RP is the owner of the source property.

Environmental Consultant Name Kevin Bugel			
Consulting Firm Giles Engineering Associates, Inc.			
Mailing Address N8 W22350 Johnson Drive, Suite A1	City Waukesha	State WI	ZIP Code 53186
Phone Number (262) 544-0118	Email kbugel@gilesengr.com		

Fees and Mailing of Closure Request

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

<input checked="" type="checkbox"/> \$1,050 Closure Fee	<input type="checkbox"/> \$300 Database Fee for Soil
<input checked="" type="checkbox"/> \$350 Database Fee for Groundwater or Monitoring Wells (Not Abandoned)	Total Amount of Payment \$ <u>\$1,400.00</u>
	<input type="checkbox"/> Resubmittal, Fees Previously Paid
- Send one paper copy and one e-copy on compact disk of the entire closure package** to the Regional Project Manager assigned to your site. Submit as *unbound, separate documents* in the order and with the titles prescribed by this form. For electronic document submittal requirements, see <http://dnr.wi.gov/files/PDF/pubs/rr/RR690.pdf>.

Site Summary

If any portion of the Site Summary Section is not relevant to the case closure request, you must fully explain the reasons why in the relevant section of the form. All information submitted shall be legible. Providing illegible information will result in a submittal being considered incomplete until corrected.

1. General Site Information and Site History

- A. Site Location: Describe the physical location of the site, both generally and specific to its immediate surroundings. The Site is located at 13145 N. Green Bay Road in Mequon, Wisconsin (Figure B.1.a). The Site is located in rural setting with undeveloped land of the Mee-Kwon Park and golf course located to the north, east and south. Privately-held undeveloped land is located to the west.
- B. Prior and current site usage: Specifically describe the current and historic occupancy and types of use. Currently, the Site includes the Fromm Family Foods pet/animal food facility. The developed portion of the Site includes several buildings, a parking lot, minor landscaped areas, and numerous driveways/accessways to the Site buildings.
- C. Current zoning (e.g., industrial, commercial, residential) for the site and for neighboring properties, and how verified (Provide documentation in Attachment G).
R-1/OA - Rural Residential Detached District/Agricultural Overlay District accessed from: http://www.ci.mequon.wi.us/vertical/sites/%7BEC6048ED-C06B-457B-A49D-CC38EE9D051C%7D/uploads/Zoning_44X62_Website.pdf.
- D. Describe how and when site contamination was discovered. The discovery of chlorinated volatile organic compounds (CVOC) impact in the Site groundwater occurred during investigation of a leaking underground storage tank (LUST) project. The compound trichloroethylene (TCE) was discovered in the groundwater collected from Site well MW-2 installed during the LUST investigation. As groundwater flow beneath the Site has consistently been to the northwest, another well, MW-8, was installed in 1999 within the plant and higher concentrations of CVOCs were discovered at that location. Monitoring well MW-12 was installed at a downgradient location to wells MW-2 and MW-8, but no TCE was detected in the groundwater at that location.
- E. Describe the type(s) and source(s) or suspected source(s) of contamination. The owner of Fromm Family Pet Foods cannot identify a specific source for the contamination. He postulates an employee may have been cleaning plant equipment utilizing solvents containing CVOCs. However, no source area is known.
- F. Other relevant site description information (or enter Not Applicable).
Not applicable.
- G. List BRRTS activity/site name and number for BRRTS activities at this source property, including closed cases.
0246000875 - FROMM BROS NIEMAN & CO - Open ERP
04-46555828 - FROMM FAMILY FOODS SPILL - Closed Spill
- H. List BRRTS activity/site name(s) and number(s) for all properties immediately adjacent to (abutting) this source property.
Not Applicable. There are no nearby or abutting properties listed in the BRRTS database.

2. General Site Conditions

- A. Soil/Geology
- i. Describe soil type(s) and relevant physical properties, thickness of soil column across the site, vertical and lateral variations in soil types.
Based on review of information obtained from the Wisconsin Geological and Natural History Survey (WGNHS), the Site is developed on a recessional moraine consisting of diamicton of the Oak Creek Formation. This formation is commonly clay- and silt-rich and may contain trace pebbles.
 - ii. Describe the composition, location and lateral extent, and depth of fill or waste deposits on the site.
No known fill is present on Site. The chlorinated compound tetrachloroethylene (PCE) was detected in Site wells MW-2 and MW-8 (refer to Figure B.1.b). The watertable is present at depths ranging from approximately 6 to 8 feet bgs that correspond with or at an approximate elevation of 760' msl. PCE was detected above its respective Wisconsin Administrative Code NR140 enforcement standard (ES) in MW-8. Other assumed degradation or product contaminant compounds including 1,1-Dichloroethane, cis-1,2-Dichloroethene, trans-1,2-Dichloroethene, 1,1,1-Trichloroethane, and trichloroethene have historically been detected in groundwater collected from well MW-2, but at concentrations below their respective ES (refer to Table A.1).
 - iii. Describe the depth to bedrock, bedrock type, competency and whether or not it was encountered during the investigation.
Based on review of WGNHS information and WDNR well logs, the unconsolidated section beneath the general area of the Site is estimated to range from 20 to 60' below ground surface. The bedrock underlying the unconsolidated section is comprised dolomite of the Thiensville and Lake Church formations.

- iv. Describe the nature and locations of current surface cover(s) across the site (e.g., natural vegetation, landscaped areas, gravel, hard surfaces, and buildings).

The Site constitutes an approximate 600' (N-S) by 500' (E-W) (approximately 9.9 acres) area surrounded by natural vegetation/wooded land. The developed area is occupied by the Fromm plant buildings, parking lots, perimeter road, watertower, garage, and other support features.

B. Groundwater

- i. Discuss depth to groundwater and piezometric elevations. Describe and explain depth variations, including high and low water table elevation and whether free product affects measurement of water table elevation. Describe the stratigraphic unit(s) where water table was found or which were measured for piezometric levels.

The depth to groundwater at well MW-8 is approximately 6.5 feet bgs. Based on review of the USGS topographic map for the area, the watertable at MW-8 is at an elevation of about 761' msl. The watertable is present within a clay-rich diamicton unit of the Oak Creek Formation. No free product was encountered.

- ii. Discuss groundwater flow direction(s), shallow and deep. Describe and explain flow variations, including fracture flow if present.

Based on work conducted by others, groundwater flow beneath the Site is to the northwest.

- iii. Discuss groundwater flow characteristics: hydraulic conductivity, flow rate and permeability, or state why this information was not obtained.

Little information is available from the previous Site consultant. However, based on familiarity with the unconsolidated units underlying the Site, the hydraulic conductivity (K) is inferred to be on the order of 10^{-5} to 10^{-6} cm/sec. With a known gradient 0.025, an assumed porosity of 0.30, and a K of 5×10^{-5} , groundwater flow velocity is estimated to be 0.004 meters/day (0.013 feet/day). This flow rate is low, and based on the presence of degradation products in the groundwater and lack of impact noted in Site well MW-12, contaminant migration is inferred to be minimal.

- iv. Identify and describe locations/distance of potable and/or municipal wells within 1200 feet of the site. Include general summary of well construction (geology, depth of casing, depth of screened or open interval).

Based on State well log records there are several wells within a 1,200' radius around the Site. Three high-capacity wells are located within Mee-Kwon park located to the northeast of the Site, several residential wells along West Chapel Hill Road and Thomas Drive including the Crossroads Presbyterian Church located to the south and southeast of the Site, and the Site production well located 1,600 feet to the east of the Site near Green Bay Road (Figure B.1.c). No well records are available for the Site production well and the 13030 Cedarburg Road property located to the southwest of the Site. All of the wells identified above are either up-gradient or side-gradient to groundwater flow measured on Site.

3. Site Investigation Summary

A. General

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

The firm Environmental Associates, Inc. (EAI) commenced site investigation in 1992 with the assessment of two UST basins (Figure B.1.b). It was during the site characterization of the petroleum releases from leaking underground storage tanks (LUSTs) that chlorinated solvents were discovered in the groundwater samples collected from monitoring well MW-2. Several reports were prepared by EAI, but perhaps the best synopsis of Site conditions pre-2000 is presented in the EIA report titled:

Request for Site Closure
Fromm Bros. Nieman & Co., Inc
13145 Green Bay Road
Mequon, Wisconsin
April 8, 1998

At that time, the WDNR granted Site closure pertinent to the LUST releases (WDNR correspondence dated August 20, 1998), but the Site remained an active ERP site due to the presence of chlorinated VOCs (CVOCs) including tetrachloroethene (PCE) (3.5 - 13 ug/l), trichloroethene (TCE) (1.4 - 2.9 ug/l), and other degradation products in monitoring well MW-2 and required definition of the CVOC release. Premised on the known northwestward groundwater flow direction, EAI installed additional monitoring wells on Site including monitoring well MW-8 located down-gradient (northwest) of MW-2 (Figure B.2.b). The groundwater collected from monitoring well MW-8 displayed higher concentrations of PCE (81 ug/l), but no degradation compounds. EAI sampled monitoring well MW-8 in 1999 and 2000. AEI later installed monitoring wells MW-10, MW-11, and MW-12 in 2006 in locations down-gradient or side-gradient to the monitoring well MW-8 well. No CVOCs were detected in the groundwater in those wells. Giles was contracted in 2012 to continue the investigation and has sampled monitoring wells MW-2 and MW-8 in July 2014 after which only monitoring well MW-8 was sampled again in October 2014, June 2015, and January 2016. The sampling results for monitoring well MW-8 are provided in Table A.1.

During the 1999-2016 period, the concentration of PCE, TCE, and other degradation products decreased to below NR 141 ES values in the groundwater at monitoring well MW-2. In similar fashion, the concentration of PCE in monitoring well MW-8 decreased by an order of magnitude from 81 ug/l in October 1999 to a low of 5.5 ug/l in July 2014, but which rebounded to 8.3 ug/l in June 2015 and 8.4 ug/l in January 2016.

Data on the Site groundwater pertinent to the presence of CVOCs is tabulated in Table A.1.

A sub-slab vapor sample was collected on January 15, 2016, proximal to monitoring well MW-8. The sample was collected into a Summa canister over a period of approximately 42-minutes. Numerous VOCs and CVOCs were detected; however, many of the detections were laboratory estimates below their respective limit of quantification. The soil vapor data set is provided in Table A.4.

- ii. Identify whether contamination extends beyond the source property boundary, and if so describe the media affected (e.g., soil, groundwater, vapors and/or sediment, etc.), and the vertical and horizontal extent of impacts. It is inferred that the groundwater contamination on Site is very limited in extent and confined to that area proximal to monitoring wells MW-2 and MW-8.

- iii. Identify any structural impediments to the completion of site investigation and/or remediation and whether these impediments are on the source property or off the source property. Identify the type and location of any structural impediment (e.g., structure) that also serves as the performance standard barrier for protection of the direct contact or the groundwater pathway.

As monitoring well MW-8 was installed within one of the Site buildings (Figure B.1.b), the entire building acts as a structural impediment. There are no structural impediments on abutting properties, but it is inferred that the extent of the CVOC plume is limited and does not extend to the property boundaries.

B. Soil

- i. Describe degree and extent of soil contamination. Relate this to known or suspected sources and known or potential receptors/migration pathways.
Not applicable. No soil sampling was performed by EAI during their assessment of Site conditions.
- ii. Describe the concentration(s) and types of soil contaminants found in the upper four feet of the soil column.
Unknown. See B.i, above.
- iii. Identify the ch. NR 720, Wis. Adm. Code, method used to establish the soil cleanup standards for this site. This includes a soil performance standard established in accordance with s. NR 720.08, a Residual Contaminant Level (RCL) established in accordance with s. NR 720.10 that is protective of groundwater quality, or an RCL established in accordance with s. NR 720.12 that is protective of human health from direct contact with contaminated soil. Identify the land use classification that was used to establish cleanup standards. Provide a copy of the supporting calculations/information in Attachment C.
Unknown. See B.i, above.

C. Groundwater

- i. Describe degree and extent of groundwater contamination. Relate this to known or suspected sources and known or potential receptors/migration pathways. Specifically address any potential or existing impacts to water supply wells or interception with building foundation drain systems.
CVOCs including tetrachloroethene (PCE) (3.5 - 13 ug/l), trichloroethene (TCE) (1.4 - 2.9 ug/l), and other degradation products detected in the groundwater collected from monitoring wells MW-2 and MW-8 (Figure B.2.b). The groundwater collected from monitoring well MW-8 displayed higher concentrations of PCE (81 ug/l), but no degradation compounds. No detectable concentrations of CVOCs have been detected in monitoring wells MW-10, MW-11, and MW-12 located in locations down-gradient or side-gradient to the monitoring well MW-8 well. The concentration of CVOCs has decreased over time to the following most-recent concentrations (only detected compounds are listed):

MW-2 (7/25/2014)
1,1-Dichloroethane 0.63J ug/l
Tetrachloroethene 1.5 ug/l

MW-8 (6/17/2015)
Tetrachloroethene 8.3 ug/l

MW-8 (1/15/2016)
Tetrachloroethene 8.4 ug/l

The results of pre-2001 groundwater data generated by Environmental Associates, Inc. is provided in Table A.1(1) and that data collected post 2012 by Giles is provided in Table A.1(2) and supporting information is provided in Attachment

C.

The source of the CVOCs in groundwater at the Site is unknown. However, there are two lines of evidence for inferring that the source may have been proximal to monitoring well MW-2 where the CVOCs in groundwater were first detected during the UST investigation conducted at the Site. First, the monitoring well MW-2 location is located upgradient of monitoring well MW-8. Second, the presence of PCE breakdown products including TCE, 1,1-Dichloroethane and others at the monitoring well MW-2 location and none at the monitoring well MW-8 location indicates that the CVOC contaminant may have been present for a longer period in the area near monitoring well MW-2 thus giving more time for anaerobic biodegradation to occur. As the concentration of CVOCs at monitoring wells MW-2 and MW-8 may also indicate that there is no longer a source area. If there was a surface spill near the monitoring well MW-2 location, the impacted soil may have been removed with the petroleum-impacted soil at the UST basin located there.

The depth to groundwater at monitoring well MW-2 has ranged from 5.2 feet to 8.2 bgs. The depth to groundwater at monitoring well MW-8 is approximately 2-3 feet deeper than at MW-2. As the Site buildings are of slab-on-grade construction, their foundations probably have no impact on groundwater flow. However, buried production process water lines may extend to 5 feet bgs possibly putting them in close proximity to the watertable at certain times of the year.

- ii. Describe the presence of free product at the site, including the thickness, depth, and locations. Identify the depth and location of the smear zone.

Free CVOC product has not been noted by Giles and never mentioned in earlier EAI reports. Based on the concentrations of CVOCs detected, the presence of free product in any significant quantity is unlikely.

D. Vapor

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

A sub-slab soil vapor sample point was installed near monitoring well MW-8 on January 15, 2016, and a vapor sample was collected into a Summa canister over a period of 42 minutes. The sample was submitted to TestAmerica of Knoxville, TN for VOC analysis in accordance with US EPA Method TO-15.

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

Not applicable. No VOCs were found to exceed Wisconsin's most-conservative (Residential) sub-slab vapor standards. Refer to Table A.4.

E. Surface Water and Sediment

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

As there is no known surface expression of CVOC contamination, the surface water and sediment pathway has not been assessed at the Site.

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

Not applicable as no surface water or sediment impact is occurring at this Site.

4. Remedial Actions Implemented and Residual Levels at Closure

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

No remedial action has been taken at this Site with respect to the detected CVOCs in the groundwater. However, past soil removal associated with LUST removal and subsequent impacted soil removal may have mitigated the CVOC source.

- B. Describe any immediate or interim actions taken at the site under ch NR 708, Wis. Adm. Code.

No immediate or interim remedial actions were taken at the Site pertinent to the CVOC release.

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

No active remedial actions were taken at the Site pertinent to the CVOC release.

- D. Describe the alternatives considered during the Green and Sustainable Remediation evaluation in accordance with NR 722.09 and any practices implemented as a result of the evaluation.

Not applicable as no remedial actions were implemented pertinent to the CVOC impact noted in the Site groundwater.

- E. Describe the nature, degree and extent of residual contamination that will remain at the source property or on other affected properties after case closure.
Minor groundwater impact will remain at the Site, however, the degree of impact will likely continue to diminish through dispersion and natural anerobic biodegradation of the contaminants.
- F. Describe the residual soil contamination within four feet of ground surface (direct contact zone) that attains or exceeds RCLs established under s. NR 720.12, Wis. Adm. Code, for protection of human health from direct contact.
The actual source area for the CVOCs is unknown. Therefore, it is unknown whether the source area still exists, and if so, if soil RCLs are exceeded.
- G. Describe the residual soil contamination that is above the observed low water table that attains or exceeds the soil standard(s) for the groundwater pathway.
Unknown see 4.f., above.
- H. Describe how the residual contamination will be addressed, including but not limited to details concerning: covers, engineering controls or other barrier features; use of natural attenuation of groundwater; and vapor mitigation systems or measures.
No action is proposed for the source area as it was never identified. As stated by the property owner, there was no CVOC source process at the Site.
- I. If using natural attenuation as a groundwater remedy, describe how the data collected supports the conclusion that natural attenuation is effective in reducing contaminant mass and concentration (e.g., stable or receding groundwater plume).
Based on the presence of PCE degradation products at the monitoring well MW-2 location, it is assumed that the subsurface at the Site exhibits conditions conducive to anerobic biodegradation of the CVOC compounds. Therefore, natural attenuation is a sound mitigation strategy for the Site.
- J. Identify how all exposure pathways (soil, groundwater, vapor) were removed and/or adequately addressed by immediate, interim and/or remedial action(s).
Not applicable as no remedial actions were taken at the Site pertinent to the CVOC release.
- K. Identify any system hardware anticipated to be left in place after site closure, and explain the reasons why it will remain.
Not applicable as no remediation system was implemented at the Site associated with the CVOC release.
- L. Identify the need for a ch. NR 140, Wis. Adm. Code, groundwater Preventive Action Limit (PAL) or Enforcement Standard (ES) exemption, and identify the affected monitoring points and applicable substances.
PAL Exceedance: PCE = 1.5 ug/l (MW-2) (PAL = 0.5 ug/l) (see Tables A.1(1) and A.1(2)).

PAL and ES Exceedence: PCE 8.4 ug/l (MW-8) (ES = 5 ug/l) (see Table A.2).
- M. If a DNR action level for vapor intrusion was exceeded (for indoor air, sub slab, or both) describe where it was exceeded and how the pathway was addressed.
Not applicable based on WDNR sub-slab vapor standards.
- N. Describe the surface water and/or sediment contaminant concentrations and areas after remediation. If a DNR action level was exceeded, describe where it was exceeded and how the pathway was addressed.
Deemed not applicable. No surface water or sediment was encountered at the Site.

5. Continuing Obligations: Situations where sites, including all affected properties and rights-of-way (ROWs), are included on the DNR's GIS Registry. In certain situations, maintenance plans are also required, and must be included in Attachment D.

Directions: For each of the 3 property types below, check all situations that apply to this closure request.

(NOTE: Monitoring wells to be transferred to another site are addressed in Attachment E.)

This situation applies to the following property or Right of Way (ROW):			Case Closure Situation - Continuing Obligation Inclusion on the GIS Registry is Required (ii. - xiv.)	Maintenance Plan Required
Property Type:				
Source Property	Affected Property (Off-Source)	ROW		
i.	<input type="checkbox"/>	<input type="checkbox"/>	None of the following situations apply to this case closure request.	NA
ii.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Residual groundwater contamination exceeds ch. NR 140 ESs.	NA
iii.	<input type="checkbox"/>	<input type="checkbox"/>	Residual soil contamination exceeds ch. NR 720 RCLs.	NA
iv.	Monitoring Wells Remain:			
	<input type="checkbox"/>	<input type="checkbox"/>	• Not Abandoned (filled and sealed)	NA
	<input type="checkbox"/>	<input type="checkbox"/>	• Continued Monitoring (requested or required)	Yes
v.	<input type="checkbox"/>	<input type="checkbox"/>	Cover/Barrier/Engineered Cover or Control for (soil) direct contact pathways (includes vapor barriers)	Yes
vi.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Cover/Barrier/Engineered Cover or Control for (soil) groundwater infiltration pathway	Yes
vii.	<input type="checkbox"/>	<input type="checkbox"/>	Structural Impediment: impedes completion of investigation or remedial action (not as a performance standard cover)	NA
viii.	<input type="checkbox"/>	<input type="checkbox"/>	Residual soil contamination meets NR 720 industrial soil RCLs, land use is classified as industrial	NA
ix.	<input type="checkbox"/>	NA	Vapor Mitigation System (VMS) required due to exceedances of vapor risk screening levels or other health based concern	Yes
x.	<input type="checkbox"/>	NA	Vapor: Dewatering System needed for VMS to work effectively	Yes
xi.	<input type="checkbox"/>	NA	Vapor: Compounds of Concern in use: full vapor assessment could not be completed	NA
xii.	<input type="checkbox"/>	NA	Vapor: Commercial/Industrial exposure assumptions used.	NA
xiii.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Vapor: Residual volatile contamination poses future risk of vapor intrusion	NA
xiv.	<input type="checkbox"/>	<input type="checkbox"/>	Site-specific situation: (e. g., fencing, methane monitoring, other) (<i>discuss with project manager before submitting the closure request</i>)	Site specific

6. Underground Storage Tanks

- A. Were any tanks, piping or other associated tank system components removed as part of the investigation or remedial action? Yes No
- B. Do any upgraded tanks meeting the requirements of ch. ATCP 93, Wis. Adm. Code, exist on the property? Yes No
- C. If the answer to question 6.B. is yes, is the leak detection system currently being monitored? Yes No

General Instructions

All information shall be legible. Providing illegible information will result in a submittal being considered incomplete until corrected. For each attachment (A-G), provide a Table of Contents page, listing all 'applicable' and 'not applicable' items by Closure Form titles (e.g., A.1. Groundwater Analytical Table, A.2. Soil Analytical Results Table, etc.). If any item is 'not applicable' to the case closure request, you must fully explain the reasons why.

Data Tables (Attachment A)

Directions for Data Tables:

- Use **bold** and italics font for information of importance on tables and figures. Use **bold** font for ch. NR 140, Wis. Adm. Code ES attainments or exceedances, and *italicized font* for ch. NR 140, Wis. Adm. Code, PAL attainments or exceedances.
- Use **bold** font to identify individual ch. NR 720 Wis. Adm. Code RCL exceedances. Tables should also include the corresponding groundwater pathway and direct contact pathway RCLs for comparison purposes. Cumulative hazard index and cumulative cancer risk exceedances should also be tabulated and identified on Tables A.2 and A.3.
- Do not use shading or highlighting on the analytical tables.
- Include on Data Tables the level of detection for results which are below the detection level (i.e., do not just list as no detect (ND)).
- Include the units on data tables.
- Summaries of all data must include information collected by previous consultants.
- Do not submit lab data sheets unless these have not been submitted in a previous report. Tabulate all data required in s. NR 716.15(3)(c), Wis. Adm. Code, in the format required in s. NR 716.15(4)(e), Wis. Adm. Code.
- Include in Attachment A all of the following tables, in the order prescribed below, with the specific Closure Form titles noted on the separate attachments (e.g., Title: A.1. Groundwater Analytical Table; A.2. Soil Analytical Results Table, etc.).
- For required documents, each table (e.g., A.1., A.2., etc.) should be a separate Portable Document Format (PDF).

A. Data Tables

- A.1. **Groundwater Analytical Table(s):** Table(s) showing the analytical results and collection dates for all groundwater sampling points (e.g., monitoring wells, temporary wells, sumps, extraction wells, potable wells) for which samples have been collected.
- A.2. **Soil Analytical Results Table(s):** Table(s) showing **all** soil analytical results and collection dates. Indicate if sample was collected above or below the observed low water table (unsaturated versus saturated).
- A.3. **Residual Soil Contamination Table(s):** Table(s) showing the analytical results of only the residual soil contamination at the time of closure. This table shall be a subset of table A.2 and should include only the soil sample locations that exceed an RCL. Indicate if sample was collected above or below the observed low water table (unsaturated versus saturated). Table A.3 is optional only if a total of fewer than 15 soil samples have been collected at the site.
- A.4. **Vapor Analytical Table(s):** Table(s) showing type(s) of samples, sample collection methods, analytical method, sample results, date of sample collection, time period for sample collection, method and results of leak detection, and date, method and results of communication testing.
- A.5. **Other Media of Concern (e.g., sediment or surface water):** Table(s) showing type(s) of sample, sample collection method, analytical method, sample results, date of sample collection, and time period for sample collection.
- A.6. **Water Level Elevations:** Table(s) showing all water level elevation measurements and dates from all monitoring wells. If present, free product should be noted on the table.
- A.7. **Other:** This attachment should include: 1) any available tabulated natural attenuation data; 2) data tables pertaining to engineered remedial systems that document operational history, demonstrate system performance and effectiveness, and display emissions data; and (3) any other data tables relevant to case closure not otherwise noted above. If this section is not applicable, please explain the reasons why.

Maps, Figures and Photos (Attachment B)

Directions for Maps, Figures and Photos:

- Provide on paper no larger than 11 x 17 inches, unless otherwise directed by the Department. Maps and figures may be submitted in a larger electronic size than 11 x 17 inches, in a PDF readable by the Adobe Acrobat Reader. However, those larger-size documents must be legible when printed.
- Prepare visual aids, including maps, plans, drawings, fence diagrams, tables and photographs according to the applicable portions of ss. NR 716.15(4), 726.09(2) and 726.11(3), (5) and (6), Wis. Adm. Code.
- Include all sample locations.
- Contour lines should be clearly labeled and defined.
- Include in Attachment B all of the following maps and figures, in the order prescribed below, with the specific Closure Form titles noted on the separate attachments (e.g., Title: B.1. Location Map; B.2. Detailed Site Map, etc.).
- For the electronic copies that are required, each map (e.g., B.1.a., B.2.a, etc.,) should be a separate PDF.
- Maps, figures and photos should be dated to reflect the most recent revision.

B.1. Location Maps

- B.1.a. **Location Map:** A map outlining all properties within the contaminated site boundaries on a United States Geological Survey (U.S.G.S.) topographic map or plat map in sufficient detail to permit easy location of all affected and/or adjacent parcels. If groundwater standards are exceeded, include the location of all potable wells, including municipal wells, within 1200 feet of the area of contamination.
- B.1.b. **Detailed Site Map:** A map that shows all relevant features (buildings, roads, current ground surface cover, individual property boundaries for all affected properties, contaminant sources, utility lines, monitoring wells and potable wells) within the contaminated area. This map is to show the location of all contaminated public streets, and highway and railroad rights-of-way in relation to the source property and in relation to the boundaries of groundwater contamination attaining or exceeding a ch. NR 140 ES, and/or in relation to the boundaries of soil contamination attaining or exceeding a RCL. Provide parcel identification numbers for all affected properties.
- B.1.c. **RR Sites Map:** From RR Sites Map ([http://dnrmaps.wi.gov/sl/?Viewer=RR Sites](http://dnrmaps.wi.gov/sl/?Viewer=RR%20Sites)) attach a map depicting the source property, and all open and closed BRRTS sites within a half-mile radius or less of the property.

B.2. Soil Figures

- B.2.a. **Soil Contamination:** Figure(s) showing the location of **all** identified unsaturated soil contamination. Use a single contour to show the horizontal extent of each area of contiguous soil contamination that exceeds a soil to groundwater pathway RCL as determined under ch. NR 720.Wis. Adm. Code. A separate contour line should be used to indicate the horizontal extent of each area of contiguous soil contamination that exceeds a direct contact RCL exceedances (0-4 foot depth).
- B.2.b. **Residual Soil Contamination:** Figure(s) showing only the locations of soil samples where unsaturated soil contamination remains at the time of closure (locations represented in Table A.3). Use a single contour to show the horizontal extent of each area of contiguous soil contamination that exceeds a soil to groundwater pathway RCL as determined under ch. NR 720 Wis. Adm. Code. A separate contour line should be used to indicate the horizontal extent of each area of contiguous soil contamination that exceeds a direct contact RCL exceedance (0-4 foot depth).

B.3. Groundwater Figures

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

B.4. Vapor Maps and Other Media

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

- B.5. Structural Impediment Photos:** One or more photographs documenting the structural impediment feature(s) which precluded a complete site investigation or remediation at the time of the closure request. The photographs should document the area that could not be investigated or remediated due to a structural impediment. The structural impediment should be indicated on Figures B.2.a and B.2.b.

Documentation of Remedial Action (Attachment C)**Directions for Documentation of Remedial Action:**

- Include in Attachment C all of the following documentation, in the order prescribed below, with the specific Closure Form titles noted on the separate attachments (e.g., Title: C.1. Site Investigation Documentation; C.2. Investigative Waste, etc.).
- If the documentation requested below has already been submitted to the DNR, please note the title and date of the report for that particular document requested.
 - C.1. **Site investigation documentation**, that has not otherwise been submitted with the Site Investigation Report.
 - C.2. **Investigative waste** disposal documentation.
 - C.3. Provide a **description of the methodology** used along with all supporting documentation if the RCLs are different than those contained in the Department's RCL Spreadsheet available at: <http://dnr.wi.gov/topic/Brownfields/Professionals.html>.
 - C.4. **Construction documentation** or as-built report for any constructed remedial action or portion of, or interim action specified in s. NR 724.02(1), Wis. Adm. Code.
 - C.5. **Decommissioning of Remedial Systems.** Include plans to properly abandon any systems or equipment.
 - C.6. **Other.** Include any other relevant documentation not otherwise noted above (This section may remain blank).

Maintenance Plan(s) and Photographs (Attachment D)**Directions for Maintenance Plans and Photographs:**

Attach a maintenance plan for each affected property (source property, each off-source affected property) with continuing obligations requiring future maintenance (e.g., direct contact, groundwater protection, vapor intrusion). See Site Summary section 5 for all affected property(s) requiring a maintenance plan. Maintenance plan guidance and/or templates for: 1) Cover/barrier systems; 2) Vapor intrusion; and 3) Monitoring wells, can be found at: <http://dnr.wi.gov/topic/Brownfields/Professionals.html#tabx3>

- D.1. Descriptions of maintenance action(s) required for maximizing effectiveness of the engineered control, vapor mitigation system, feature or other action for which maintenance is required:**
- Provide brief descriptions of the type, depth and location of residual contamination.

- Provide a description of the system/cover/barrier/monitoring well(s) to be maintained.
 - Provide a description of the maintenance actions required for maximizing effectiveness of the engineered control, vapor mitigation system, feature or other action for which maintenance is required.
 - Provide contact information, including the name, address and phone number of the individual or facility who will be conducting the maintenance.
- D.2. **Location map(s) which show(s):** (1) the feature that requires maintenance; (2) the location of the feature(s) that require(s) maintenance - on and off the source property; (3) the extent of the structure or feature(s) to be maintained, in relation to other structures or features on the site; (4) the extent and type of residual contamination; and (5) all property boundaries.
- D.3. **Photographs** for site or facilities with a cover or other performance standard, a structural impediment or a vapor mitigation system, include one or more photographs documenting the condition and extent of the feature at the time of the closure request. Pertinent features shall be visible and discernible. Photographs shall be submitted with a title related to the site name and location, and the date on which it was taken.
- D.4. **Inspection log**, to be maintained on site, or at a location specified in the maintenance plan or approval letter. The inspection and maintenance log is found at: <http://dnr.wi.gov/files/PDF/forms/4400/4400-305.pdf>.

Monitoring Well Information (Attachment E)

Directions for Monitoring Well Information:

For all wells that will remain in use, be transferred to another party, or that could not be located; attach monitoring well construction and development forms (DNR Form 4400-113 A and B: http://dnr.wi.gov/topic/groundwater/documents/forms/4400_113_1_2.pdf)

Select One:

- No monitoring wells were installed as part of this response action.
- All monitoring wells have been located and will be properly abandoned upon the DNR granting conditional closure to the site
- Select One or More:**
- Not all monitoring wells can be located, despite good faith efforts. Attachment E must include a description of efforts made to locate the wells.
- One or more wells will remain in use at the site after this closure. Attachment E must include documentation as to the reason (s) the well(s) will remain in use. When one or more monitoring wells will remain in use this is considered a continuing obligation and a maintenance plan will be required and must be included in Attachment D.
- One or more monitoring wells will be transferred to another owner upon case closure being granted. Attachment E should include documentation identifying the name, address and email for the new owner(s). Provide documentation from the party accepting future responsibility for monitoring well(s).

Source Legal Documents (Attachment F)

Directions for Source Legal Documents:

Label documents with the specific closure form titles (e.g., F.1. Deed, F.2. Certified Survey Map, etc.). Include all of the following documents, in the order listed:

- F.1. **Deed:** The most recent deed with legal description clearly listed.
- Note: If a property has been purchased with a land contract and the purchaser has not yet received a deed, a copy of the land contract which includes the legal description shall be submitted instead of the most recent deed. If the property has been inherited, written documentation of the property transfer should be submitted along with the most recent deed.*
- F.2. **Certified Survey Map:** A copy of the certified survey map or the relevant section of the recorded plat map for those properties where the legal description in the most recent deed refers to a certified survey map or a recorded plat map. In cases where the certified survey map or recorded plat map are not legible or are unavailable, a copy of a parcel map from a county land information office may be substituted. A copy of a parcel map from a county land information office shall be legible, and the parcels identified in the legal description shall be clearly identified and labeled with the applicable parcel identification number.
- F.3. **Verification of Zoning:** Documentation (e.g., official zoning map or letter from municipality) of the property's or properties' current zoning status.
- F.4. **Signed Statement:** A statement signed by the Responsible Party (RP), which states that he or she believes that the attached legal description(s) accurately describe(s) the correct contaminated property or properties. This section applies to the source property only. Signed statements for Other Affected Properties should be included in Attachment G.

Notifications to Owners of Affected Properties (Attachment G)

Directions for Notifications to Owners of Affected Properties:

Complete the table on the following page for sites which require notification to owners of affected properties pursuant to ch. 292, Wis. Stats. and ch. NR 725 and 726, Wis. Adm. Code. 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.]. The DNR's "Guidance on Case Closure and the Requirements for Managing Continuing Obligations" (PUB-RR-606) lists specific notification requirements <http://dnr.wi.gov/files/PDF/pubs/rr/RR606.pdf>.

State law requires that the responsible party provide a 30-day, written advance notification to certain persons prior to applying for case closure. This requirement applies if: (1) the person conducting the response action does not own the source property; (2) the contamination has migrated onto another property; and/or (3) one or more monitoring wells will not be abandoned. Use form 4400-286, Notification of Continuing Obligations and Residual Contamination, at <http://dnr.wi.gov/files/PDF/forms/4400/4400-286.pdf>

Include a copy of each notification sent and accompanying proof of delivery, i.e., return receipt or signature confirmation. (These items will not be placed on the GIS Registry.)

Include the following documents for each property, keeping each property's documents grouped together and labeled with the letter G and the corresponding ID number from the table on the following page. (Source Property documents should only be included in Attachment F):

- **Deed:** The most recent deed with legal descriptions clearly listed for all affected properties.
Note: If a property has been purchased with a land contract and the purchaser has not yet received a deed, a copy of the land contract which includes the legal description shall be submitted instead of the most recent deed. If the property has been inherited, written documentation of the property transfer should be submitted along with the most recent deed.
- **Certified Survey Map:** A copy of the certified survey map or the relevant section of the recorded plat map for those properties where the legal description in the most recent deed refers to a certified survey map or a recorded plat map. In cases where the certified survey map or recorded plat map are not legible or are unavailable, a copy of a parcel map from a county land information office may be substituted. A copy of a parcel map from a county land information office shall be legible, and the parcels identified in the legal description shall be clearly identified and labeled with the applicable parcel identification number.
- **Verification of Zoning:** Documentation (e.g., official zoning map or letter from municipality) of the property's or properties' current zoning status.
- **Signed Statement:** A statement signed by the Responsible Party (RP), which states that he or she believes the attached legal description(s) accurately describe(s) the correct contaminated property or properties.

Signatures and Findings for Closure Determination

Check the correct box for this case closure request, and have either a professional engineer or a hydrogeologist, as defined in ch. NR 712, Wis. Adm. Code, sign this document.

[X] A response action(s) for this site addresses groundwater contamination (including natural attenuation remedies).

[] The response action(s) for this site addresses media other than groundwater.

Engineering Certification

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

Printed Name Title

Signature Date P.E. Stamp and Number

Hydrogeologist Certification

I Kevin T. Bugel hereby certify that I am a hydrogeologist as that term is defined in s. NR 712.03 (1), Wis. Adm. Code, and that, to the best of my knowledge, all of the information contained in this case closure request is correct and the document was prepared by me or prepared under my supervision and, in compliance with all applicable requirements in chs. NR 700 to 726, Wis. Adm. Code. Specifically, with respect to compliance with the rules, in my professional opinion a site investigation has been conducted in accordance with ch. NR 716, Wis. Adm. Code, and all necessary remedial actions have been completed in accordance with chs. NR 140, NR 718, NR 720, NR 722, NR 724 and NR 726, Wis. Adm. Codes."

Kevin T. Bugel, P.G., C.P.G. Environmental Division Manager

Printed Name Title

 08/23/2016

Signature Date

Attachment A: Data Tables

Data Table A.1

Included

Data Table A.2

Not included. As the initial focus at the Site was on LUSTs, only PVOCs were analyzed.

Data Table A.3

This table was not included as the source of the CVOC impact in soil is unknown.

Data Table A.4

Included

Data Table A.5

These tables were not included as surface water or sediment impact is unlikely at the Site.

Data Table A.6

Not included as the water levels provided were collected over several years thus making correlation difficult.

Data Table A.7

These tables were not included as no NA data is available nor was a remedial action implemented pertinent to the CVOC release.

TABLE A.1(1)

Groundwater Laboratory Analytical Results
 Fromm Bros. Nieman Co., Inc.,
 13145 Green Bay Road, Mequon, Wisconsin

Parameter	Units	ES	PAL	Date	MW1	MW2	MW6	MW7	MW-8
GRO	ug/l	--	--	03/26/92	< 5,000	< 5,000	< 5,000	< 5,000	NI
				05/18/92	--	--	--	--	NI
				04/16/93	--	--	--	--	NI
				12/01/93	--	--	--	--	NI
				06/14/94	--	< 1,000	--	120	NI
				09/20/94	--	--	--	< 50	NI
				12/19/94	< 50	--	< 50	< 50	NI
				06/26/95	< 50	--	< 50	< 50	NI
				09/05/95	< 50	< 50	< 50	< 50	NI
				12/13/95	--	--	--	< 50	NI
				03/11/96	--	--	--	< 50	NI
				03/03/97	--	--	--	< 100	NI
				06/04/97	--	--	--	< 100	NI
				09/05/97	--	--	--	< 100	NI
				01/12/98	--	--	--	< 100	NI
01/18/00	--	--	--	--	--				
DRO	ug/l	--	--	03/26/92	< 1,000	< 1,000	< 1,000	< 1,000	NI
				05/18/92	--	--	--	--	NI
				04/16/93	--	--	--	--	NI
				12/01/93	--	--	--	--	NI
				06/14/94	--	700	--	160	NI
				09/20/94	--	--	--	100	NI
				12/19/94	< 100	--	< 100	< 100	NI
				06/26/95	< 100	--	< 100	< 100	NI
				09/05/95	< 100	1,800	< 100	< 100	NI
				12/13/95	--	2,000	--	--	NI
				03/11/96	--	1,600	--	--	NI
				03/03/97	--	< 100	--	--	NI
				06/04/97	--	200	--	--	NI
				09/11/97	--	140	--	--	NI
				01/12/98	--	230	--	--	NI
01/18/00	--	--	--	--	--				
Benzene	ug/l	5.0	0.5	03/26/92	< 1.0	< 1.0	< 1.0	120	NI
				05/18/92	--	--	--	< 1.0	NI
				04/16/93	< 1.0	< 1.0	< 1.0	--	NI
				12/01/93	< 1.0	< 1.0	< 1.0	--	NI
				06/14/94	--	< 0.3	--	69	NI
				09/20/94	--	--	--	< 0.6	NI
				12/19/94	< 1.0	--	< 1.0	1.5	NI
				06/26/95	< 0.6	--	< 0.6	1.0	NI
				09/05/95	< 0.6	< 0.6	< 0.6	< 0.6	NI
				12/13/95	--	< 0.6	--	< 0.6	NI
				03/11/96	--	< 0.6	--	< 0.6	NI
				03/03/97	--	< 0.21	--	< 0.21	NI
				06/04/97	--	< 0.21	--	< 0.21	NI
				09/05/97	--	< 0.21	--	< 0.21	NI
				01/12/98	< 0.21	< 0.21	< 0.21	< 0.21	NI
01/18/00	--	--	--	--	< 0.32				
Bromobenzene	ug/l	--	--	03/26/92	< 1.0	1.3	< 1.0	< 1.0	NI
				05/18/92	--	--	--	< 1.0	NI
				04/16/93	< 1.0	< 1.0	< 1.0	--	NI
				12/01/93	< 1.0	< 1.0	< 1.0	--	NI
				06/14/94	--	< 0.3	--	< 0.3	NI
				09/20/94	--	--	--	< 1.0	NI
				12/19/94	< 1.0	--	< 1.0	< 1.0	NI
				06/26/95	< 1.0	--	< 1.0	< 1.0	NI
				09/05/95	< 1.0	< 1.0	< 1.0	< 1.0	NI
				12/13/95	--	< 1.0	--	< 1.0	NI
				03/11/96	--	< 1.0	--	< 1.0	NI
				03/03/97	--	< 0.27	--	< 0.27	NI
				06/04/97	--	< 0.27	--	< 0.27	NI
				09/05/97	--	< 0.27	--	< 0.27	NI
				01/12/98	< 0.27	< 0.27	< 0.27	< 0.27	NI
01/18/00	--	--	--	--	< 0.32				

See Attached Footnotes

TABLE A.1(1)

Groundwater Laboratory Analytical Results
 Fromm Bros. Nieman Co., Inc.,
 13145 Green Bay Road, Mequon, Wisconsin

Parameter	Units	ES	PAL	Date	MW1	MW2	MW6	MW7	MW-8
n-Butylbenzene	ug/l	--	--	03/26/92	<1.0	2.1	<1.0	<1.0	NI
				05/18/92	--	--	--	<1.0	NI
				04/16/93	<1.0	<1.0	<1.0	--	NI
				12/01/93	<1.0	<1.0	<1.0	--	NI
				06/14/94	--	<0.7	--	<0.7	NI
				09/20/94	--	--	--	<1.0	NI
				12/19/94	<1.0	--	<1.0	<1.0	NI
				06/26/95	<1.0	--	<1.0	<1.0	NI
				09/05/95	<1.0	<1.0	<1.0	<1.0	NI
				12/13/95	--	<1.0	--	<1.0	NI
				03/11/96	--	<1.0	--	<1.0	NI
				03/03/97	--	<0.27	--	<0.27	NI
				06/04/97	--	<0.38	--	<0.38	NI
				09/05/97	--	<0.38	--	<0.38	NI
				01/12/98	<0.38	<0.38	<0.38	<0.38	NI
				01/18/00	--	--	--	--	<0.23
sec-Butylbenzene	ug/l	--	--	03/26/92	<1.0	3.5	<1.0	<1.0	NI
				05/18/92	--	--	--	<1.0	NI
				04/16/93	<1.0	2.6	<1.0	--	NI
				12/01/93	<1.0	2.0	<1.0	--	NI
				06/14/94	--	1.7	--	<0.5	NI
				09/20/94	--	--	--	<1.0	NI
				12/19/94	<1.0	--	<1.0	<1.0	NI
				06/26/95	<1.0	--	<1.0	<1.0	NI
				09/05/95	<1.0	1.2	<1.0	<1.0	NI
				12/13/95	--	1.2	--	<1.0	NI
				03/11/96	--	1.5	--	<1.0	NI
				03/03/97	--	1.4	--	<0.6	NI
				06/04/97	--	1.3	--	<0.6	NI
				09/05/97	--	1.4	--	<0.6	NI
				01/12/98	<0.6	1.5	<0.6	<0.6	NI
				01/18/00	--	--	--	--	<0.34
Chloromethane	ug/l	3	0.3	03/26/92	<1.0	<1.0	<1.0	<1.0	NI
				05/18/92	--	--	--	<1.0	NI
				04/16/93	<1.0	<1.0	<1.0	--	NI
				12/01/93	<1.0	<1.0	<1.0	--	NI
				06/14/94	--	<0.6	--	<0.6	NI
				09/20/94	--	--	--	<1.0	NI
				12/19/94	<1.0	--	<1.0	<1.0	NI
				06/26/95	<1.0	--	<1.0	<1.0	NI
				09/05/95	1.2	<1.0	<1.0	<1.0	NI
				12/13/95	--	<1.0	--	<1.0	NI
				03/11/96	--	<1.0	--	<1.0	NI
				03/03/97	--	<0.083	--	<0.083	NI
				06/04/97	--	<0.083	--	<0.083	NI
				09/05/97	--	<0.083	--	<0.083	NI
				01/12/98	<0.083	<0.083	<0.083	<0.083	NI
				01/18/00	--	--	--	--	<0.18
1,1-DCA	ug/l	850	85	03/26/92	<1.0	<1.0	<1.0	<1.0	NI
				05/18/92	--	--	--	<1.0	NI
				04/16/93	<1.0	<1.0	<1.0	--	NI
				12/01/93	<1.0	1.6	<1.0	--	NI
				06/14/94	--	1.1	--	<0.6	NI
				09/20/94	--	--	--	<1.0	NI
				12/19/94	<1.0	--	<1.0	<1.0	NI
				06/26/95	<1.0	--	<1.0	<1.0	NI
				09/05/95	<1.0	1.8	<1.0	<1.0	NI
				12/13/95	--	1.8	--	<1.0	NI
				03/11/96	--	1.7	--	<1.0	NI
				03/03/97	--	1.4	--	<0.31	NI
				06/04/97	--	0.72	--	<0.31	NI
				09/05/97	--	2.4	--	<0.31	NI
				01/12/98	<0.31	1.4	<0.31	<0.31	NI
				01/18/00	--	--	--	--	<0.34

See Attached Footnotes

TABLE A.1(1)

Groundwater Laboratory Analytical Results
 Fromm Bros. Nieman Co., Inc.,
 13145 Green Bay Road, Mequon, Wisconsin

Parameter	Units	ES	PAL	Date	MW1	MW2	MW6	MW7	MW-8
1,2-DCA	ug/l	5.0	0.5	03/26/92	<1.0	<1.0	<1.0	65	NI
				05/18/92	--	--	--	<1.0	NI
				04/16/93	<1.0	<1.0	<1.0	--	NI
				12/01/93	<1.0	<1.0	<1.0	--	NI
				06/14/94	--	<0.4	--	29	NI
				09/20/94	--	--	--	17	NI
				12/19/94	<1.0	--	<1.0	17	NI
				06/26/95	<1.0	--	<1.0	18	NI
				09/05/95	<1.0	<1.0	<1.0	17	NI
				12/13/95	--	<1.0	--	14	NI
				03/11/96	--	<1.0	--	4.7	NI
				03/03/97	--	<0.14	--	7.7	NI
				06/04/97	--	<0.14	--	7.6	NI
				09/05/97	--	<0.14	--	8.5	NI
				01/12/98	<0.14	<0.14	<0.14	5.7	NI
01/18/00	--	--	--	--	<0.36				
cis-1,2-DCE	ug/l	70	7	03/26/92	<1.0	<1.0	<1.0	<1.0	NI
				05/18/92	--	--	--	<1.0	NI
				04/16/93	<1.0	<1.0	<1.0	--	NI
				12/01/93	<1.0	1.6	<1.0	--	NI
				06/14/94	--	<0.8	--	<0.8	NI
				09/20/94	--	--	--	<1.0	NI
				12/19/94	<1.0	--	<1.0	<1.0	NI
				06/26/95	<1.0	--	<1.0	<1.0	NI
				09/05/95	<1.0	1.5	<1.0	<1.0	NI
				12/13/95	--	1.3	--	<1.0	NI
				03/11/96	--	1.6	--	<1.0	NI
				03/03/97	--	1.3	--	<0.32	NI
				06/04/97	--	1.04	--	<0.32	NI
				09/05/97	--	2.3	--	<0.32	NI
				01/12/98	<0.32	1.5	<0.32	<0.32	NI
01/18/00	--	--	--	--	<0.32				
trans-1,2-DCE	ug/l	100	20	03/26/92	<1.0	<1.0	<1.0	<1.0	NI
				05/18/92	--	--	--	<1.0	NI
				04/16/93	<1.0	<1.0	<1.0	--	NI
				12/01/93	<1.0	<1.0	<1.0	--	NI
				06/14/94	--	<0.05	--	<0.05	NI
				09/20/94	--	--	--	<1.0	NI
				12/19/94	<1.0	--	<1.0	<1.0	NI
				06/26/95	<1.0	--	<1.0	<1.0	NI
				09/05/95	<1.0	1.0	<1.0	<1.0	NI
				12/13/95	--	<1.0	--	<1.0	NI
				03/11/96	--	<1.0	--	<1.0	NI
				03/03/97	--	0.77	--	<0.11	NI
				06/04/97	--	<0.11	--	<0.11	NI
				09/05/97	--	1.8	--	<0.11	NI
				01/12/98	<0.11	0.93	<0.11	<0.11	NI
01/18/00	--	--	--	--	<0.38				
Ethylbenzene	ug/l	700	140	03/26/92	<1.0	<1.0	<1.0	<1.0	NI
				05/18/92	--	--	--	<1.0	NI
				04/16/93	<1.0	<1.0	<1.0	--	NI
				12/01/93	<1.0	<1.0	<1.0	--	NI
				06/14/94	--	<0.4	--	<0.4	NI
				09/20/94	--	--	--	<1.0	NI
				12/19/94	<1.0	--	<1.0	<1.0	NI
				06/26/95	<1.0	--	<1.0	<1.0	NI
				09/05/95	<1.0	<1.0	<1.0	<1.0	NI
				12/13/95	--	<1.0	--	<1.0	NI
				03/11/96	--	<1.0	--	<1.0	NI
				03/03/97	--	<0.68	--	<0.68	NI
				06/04/97	--	<0.68	--	<0.68	NI
				09/05/97	--	<0.68	--	<0.68	NI
				01/12/98	<0.68	<0.68	<0.68	<0.68	NI
01/18/00	--	--	--	--	<0.34				

See Attached Footnotes

TABLE A.1(1)

Groundwater Laboratory Analytical Results
 Fromm Bros. Nieman Co., Inc.,
 13145 Green Bay Road, Mequon, Wisconsin

Parameter	Units	ES	PAL	Date	MW1	MW2	MW6	MW7	MW-8
MTBE	ug/l	60	12	03/26/92	--	--	--	--	NI
				05/18/92	--	--	--	--	NI
				04/16/93	< 1.0	< 1.0	< 1.0	--	NI
				12/01/93	--	--	--	--	NI
				06/14/94	--	< 0.5	--	< 0.5	NI
				09/20/94	--	--	--	1.8	NI
				12/19/94	< 1.0	--	< 1.0	2.1	NI
				06/26/95	< 1.0	--	< 1.0	2.5	NI
				09/05/95	< 1.0	< 1.0	< 1.0	2.2	NI
				12/13/95	--	< 1.0	--	2.4	NI
				03/11/96	--	< 1.0	--	< 1.0	NI
				03/03/97	--	< 0.21	--	1.5	NI
				06/04/97	--	< 0.21	--	1.7	NI
				09/05/97	--	< 0.21	--	1.1	NI
				01/12/98	< 0.21	< 0.21	< 0.21	1.2	NI
01/18/00	--	--	--	--	< 0.31				
Methylene Chloride	ug/l	5	0.5	03/26/92	< 1.0	< 1.0	< 1.0	< 1.0	NI
				05/18/92	--	--	--	< 1.0	NI
				04/16/93	* 4.6	< 1.0	* 4.1	--	NI
				12/01/93	< 1.0	< 1.0	< 1.0	--	NI
				06/14/94	--	* 1.4	--	* 1.4	NI
				09/20/94	--	--	--	< 2.0	NI
				12/19/94	< 1.0	--	< 1.0	< 1.0	NI
				06/26/95	< 4.0	--	< 4.0	< 4.0	NI
				09/05/95	< 1.0	< 1.0	< 1.0	< 1.0	NI
				12/13/95	--	< 1.0	--	< 1.0	NI
				03/11/96	--	< 1.0	--	< 1.0	NI
				03/03/97	--	< 0.29	--	< 0.29	NI
				06/04/97	--	< 0.29	--	< 0.29	NI
				09/05/97	--	< 0.29	--	< 0.29	NI
				01/12/98	< 0.29	< 0.29	< 0.29	< 0.29	NI
01/18/00	--	--	--	--	< 2.0				
Naphthalene	ug/l	40	8	03/26/92	< 1.0	< 1.0	< 1.0	< 1.0	NI
				05/18/92	--	--	--	< 1.0	NI
				04/16/93	< 1.0	# 2.5	< 1.0	--	NI
				12/01/93	< 1.0	2.7	< 1.0	--	NI
				06/14/94	--	< 0.7	--	< 0.7	NI
				09/20/94	--	--	--	< 2.0	NI
				12/19/94	< 1.0	--	< 1.0	< 1.0	NI
				06/26/95	< 2.0	--	< 2.0	< 2.0	NI
				09/05/95	< 1.0	< 1.0	< 1.0	< 1.0	NI
				12/13/95	--	< 1.0	--	< 1.0	NI
				03/11/96	--	< 1.0	--	< 1.0	NI
				03/03/97	--	< 1	--	< 1	NI
				06/04/97	--	< 1	--	< 1	NI
				09/05/97	--	< 1	--	< 1	NI
				01/12/98	< 1	< 1	< 1	< 1	NI
01/18/00	--	--	--	--	< 0.88				
PCE	ug/l	5	0.5	03/26/92	< 1.0	8.1	< 1.0	< 1.0	NI
				05/18/92	--	--	--	< 1.0	NI
				04/16/93	< 1.0	13	< 1.0	--	NI
				12/01/93	< 1.0	5.2	< 1.0	--	NI
				06/14/94	--	5.3	--	< 0.5	NI
				09/20/94	--	--	--	< 1.0	NI
				12/19/94	< 1.0	--	< 1.0	< 1.0	NI
				06/26/95	< 1.0	--	< 1.0	< 1.0	NI
				09/05/95	< 1.0	4.2	< 1.0	< 1.0	NI
				12/14/95	--	5.8	--	< 1.0	NI
				03/11/96	--	5.2	--	< 1.0	NI
				03/03/97	--	4.3	--	< 0.13	NI
				06/04/97	--	3.5	--	< 0.13	NI
				09/05/97	--	3.7	--	< 0.13	NI
				01/12/98	< 0.13	3.5	< 0.13	< 0.13	NI
01/18/00	--	--	--	--	64				

See Attached Footnotes

TABLE A.1(1)

Groundwater Laboratory Analytical Results
 Fromm Bros. Nieman Co., Inc.,
 13145 Green Bay Road, Mequon, Wisconsin

Parameter	Units	ES	PAL	Date	MW1	MW2	MW6	MW7	MW-8
Toluene	ug/l	10,000	1,000	03/26/92	< 1.0	< 1.0	< 1.0	< 1.0	NI
				05/18/92	--	--	--	< 1.0	NI
				04/16/93	< 1.0	< 1.0	< 1.0	--	NI
				12/01/93	< 1.0	< 1.0	< 1.0	--	NI
				06/14/94	--	< 0.4	--	1.7	NI
				09/20/94	--	--	--	< 1.0	NI
				12/19/94	< 1.0	--	< 1.0	2.0	NI
				06/26/95	< 1.0	--	< 1.0	< 1.0	NI
				09/05/95	< 1.0	< 1.0	< 1.0	< 1.0	NI
				12/13/95	--	1.6	--	1.5	NI
				03/11/96	--	< 1.0	--	< 1.0	NI
				03/03/97	--	< 1.5	--	2.8	NI
				06/04/97	--	< 1.5	--	< 1.5	NI
				09/05/97	--	< 1.5	--	< 1.5	NI
				01/12/98	< 1.5	< 1.5	< 1.5	< 1.5	NI
01/18/00	--	--	--	--	< 0.34				
1,1,1-TCA	ug/l	200	40	03/26/92	< 1.0	3.3	< 1.0	< 1.0	NI
				05/18/92	--	--	--	< 1.0	NI
				04/16/93	< 1.0	4.4	< 1.0	--	NI
				12/01/93	< 1.0	1.9	< 1.0	--	NI
				06/14/94	--	2.2	--	< 0.5	NI
				09/20/94	--	--	--	< 1.0	NI
				12/19/94	< 1.0	--	< 1.0	< 1.0	NI
				06/26/95	< 1.0	--	< 1.0	< 1.0	NI
				09/05/95	< 1.0	3.1	< 1.0	< 1.0	NI
				12/13/95	--	3.8	--	< 1.0	NI
				03/11/96	--	2.8	--	< 1.0	NI
				03/03/97	--	2.9	--	< 0.37	NI
				06/04/97	--	2	--	< 0.37	NI
				09/05/97	--	1.8	--	< 0.37	NI
				01/12/98	< 0.37	2	< 0.37	< 0.37	NI
01/18/00	--	--	--	--	< 0.45				
TCE	ug/l	5	0.5	03/26/92	< 1.0	< 1.0	< 1.0	< 1.0	NI
				05/18/92	--	--	--	< 1.0	NI
				04/16/93	< 1.0	< 1.0	< 1.0	--	NI
				12/01/93	< 1.0	2.3	< 1.0	--	NI
				06/14/94	--	1.9	--	< 0.4	NI
				09/20/94	--	--	--	< 1.0	NI
				12/19/94	< 1.0	--	< 1.0	< 1.0	NI
				06/26/95	< 1.0	--	< 1.0	< 1.0	NI
				09/05/95	< 1.0	2.5	< 1.0	< 1.0	NI
				12/13/95	--	2.8	--	< 1.0	NI
				03/11/96	--	2.8	--	< 1.0	NI
				03/03/97	--	2.2	--	< 0.13	NI
				06/04/97	--	1.4	--	< 0.13	NI
				09/05/97	--	2.9	--	< 0.13	NI
				01/12/98	< 0.13	2.3	< 0.13	< 0.13	NI
01/18/00	--	--	--	--	< 0.48				
Total TMB	ug/l	480	96	03/26/92	< 2.0	< 2.0	< 2.0	< 2.0	NI
				05/18/92	--	--	--	< 2.0	NI
				04/16/93	< 2.0	< 2.0	< 2.0	--	NI
				12/01/93	< 2.0	< 2.0	< 2.0	--	NI
				06/14/94	--	< 1.2	--	< 1.2	NI
				09/20/94	--	--	--	< 2.0	NI
				12/19/94	< 2.0	--	< 2.0	< 2.0	NI
				06/26/95	< 2.0	--	< 2.0	< 2.0	NI
				09/05/95	< 2.0	< 2.0	< 2.0	< 2.0	NI
				12/13/95	--	< 2.0	--	< 2.0	NI
				03/11/96	--	< 2.0	--	< 2.0	NI
				03/03/97	--	< 1.86	--	< 1.86	NI
				06/04/97	--	< 1.86	--	< 1.86	NI
				09/05/97	--	< 1.86	--	< 1.86	NI
				01/12/98	< 1.86	< 1.86	< 1.86	< 1.86	NI
01/18/00	--	--	--	--	< 0.99				

See Attached Footnotes

TABLE A.1(1)

Groundwater Laboratory Analytical Results
 Fromm Bros. Nieman Co., Inc.,
 13145 Green Bay Road, Mequon, Wisconsin

Parameter	Units	ES	PAL	Date	MW1	MW2	MW6	MW7	MW-8
Total Xylenes *	ug/l	10,000	1,000	03/26/92	< 2.0	< 2.0	< 2.0	< 2.0	NI
				05/18/92	--	--	--	< 2.0	NI
				04/16/93	< 2.0	< 2.0	< 2.0	--	NI
				12/01/93	< 3.0	< 3.0	< 3.0	--	NI
				06/14/94	--	< 1.3	--	1.8	NI
				09/20/94	--	--	--	< 2.0	NI
				12/19/94	< 2.0	--	< 2.0	< 2.0	NI
				06/26/95	< 2.0	--	< 2.0	< 2.0	NI
				09/05/95	< 2.0	< 2.0	< 2.0	< 2.0	NI
				12/13/95	--	< 2.0	--	< 2.0	NI
				03/11/96	--	< 2.0	--	< 2.0	NI
				03/03/97	--	< 1.2	--	< 1.2	NI
				06/04/97	--	< 1.2	--	< 1.2	NI
				09/05/97	--	< 1.2	--	< 1.2	NI
				01/12/98	< 1.78	< 1.78	< 1.78	< 1.78	NI
				01/18/00	--	--	--	--	< 0.98
				Lead	ug/l	15	1.5	03/26/92	< 20
05/18/92	--	--	--					--	NI
04/16/93	--	--	--					--	NI
12/01/93	--	--	--					--	NI
06/14/94	--	< 2.0	--					< 2.0	NI
09/20/94	--	--	--					< 2.0	NI
12/19/94	< 2.0	--	< 2.0					< 2.0	NI
06/26/95	< 2.0	--	< 2.0					< 2.0	NI
09/05/95	< 2.0	< 2.0	< 2.0					< 2.0	NI
12/13/95	--	--	--					--	NI
03/11/96	--	--	--					--	NI
03/03/97	--	--	--					--	NI
06/04/97	--	--	--					--	NI
09/05/97	--	--	--					--	NI
01/12/98	--	--	--					--	NI
01/18/00	--	--	--					--	--

Footnotes:

- ES = WAC NR 140.10 Table 1 and/or 2 Groundwater Quality Enforcement Standard
- PAL = WAC NR 140.10 Table 1 and/or 2 Groundwater Quality Preventative Action Limit
- ug/l = Micrograms per Liter
- ^ = Detected Between the Limit of Detection and Limit of Quantification
- * = Combined Total Xylenes (Sum of m/p-Xylenes and o-Xylenes)
- # = Attributed to Laboratory Background Conditions
- NI = Not Installed
- = Not Analyzed or No Established WAC NR 140.10 Table 1 and/or 2 Groundwater Quality Standard

TABLE A.1(2)

GROUNDWATER ANALYTICAL RESULTS SUMMARY-DETECTED VOCs

Fromm Family Pet Food
13145 Green Bay Road
Mequon, Wisconsin
Project No. 1E-1205015

	Sample Location										NR 140 PAL	NR 140 ES
	MW-1	MW-2		MW-8								
Date	7/25/2014	3/29/2006	7/25/2014	10/15/1999	1/10/2000	3/29/2006	7/25/2014	10/31/2014	6/17/2015	1/15/2016		
Detected VOCs (ug/L)												
sec-Butylbenzene	<2.2	0.94	<2.2	<0.34	<0.34	<0.25	<2.2	<2.2	<2.2	<2.2	NS	NS
1,1-Dichloroethane	<0.24	1.9	0.63 J	<0.39	<0.39	<0.50	<0.24	<0.24	<0.41	<0.24	85	850
cis-1,2-Dichloroethene	<0.26	1.6J	<0.26	<0.32	<0.32	<0.50	<0.26	<0.26	<0.26	<0.26	7	70
trans-1,2-Dichloroethene	<0.26	0.83J	<0.26	<0.38	<0.38	<0.50	<0.26	<0.27	<0.26	<0.26	20	100
Tetrachloroethene	<0.50	1.6J	1.5	81	64	9.6	5.5	7.0	8.3	8.4	0.5	5
1,1,1-Trichloroethane	<0.50	0.83J	<0.50	<.45	<.45	<0.50	<0.50	<0.50	<0.50	<0.50	40	200
Trichloroethene	<0.33	1.4	<0.33	<0.48	<0.48	<0.20	<0.33	<0.33	<0.33	<0.33	0.5	5

NOTES:

VOCs: Volatile Organic Compounds

WAC: Wisconsin Administrative Code

NR: Natural Resources Chapter

ES: WAC NR 140 Enforcement Standards

PAL: WAC NR 140 Preventive Action Limit

ug/L: Micrograms per Liter; equivalent to parts per billion (ppb)

NS: No Standard

Results indicated in blue/parenthesis exceed the WAC NR 140 Preventive Action Limit (PAL)

Results indicated in red/underlined exceed the WAC NR 140 Enforcement Standards (ES)

TABLE A.4

SUB-SLAB SOIL GAS RESULTS SUMMARY-DETECTED VOCS

Fromm Family Pet Food
13145 Green Bay Road
Mequon, Wisconsin
Project No. 1E-1205015

Analyte	Sample Location	Soil Gas Sub-Slab Screening Levels		
	VP-1	Residential ($\mu\text{g}/\text{m}^3$)	Small Commercial ($\mu\text{g}/\text{m}^3$)	Large Commercial/Industrial ($\mu\text{g}/\text{m}^3$)
Sample Date	1/15/2016			
Detected Volatile Organic Compounds (VOCs) ($\mu\text{g}/\text{m}^3$)				
1,1,2-Trichloro-1,2,2-trifluoroethane	0.46 J	1,033,333	4,333,333	13,000,000
1,2,4-Trimethylbenzene	2.3	243	1,033	3,100
1,3,5- Trimethylbenzene	0.76 J	NS	NS	NS
1,4-Dichlorobenzene	3.5	87	367	1,100
2-Butanone (MEK)	5.7	173,333	733,333	2,200,000
2-Hexanone	1.2 J	1,033	4,333	13,000
4-Methyl-2-pentanone (MIBK)	1.4 JB	103,333	433,333	1,300,000
Acetone	130	1,066,667	4,666,667	14,000,000
Benzene	3.7	120	533	1,600
Bromomethane	0.14 J	173	733	2,200
Butane	56	NS	NS	NS
Carbon disulfide	0.67 J	24,333	103,333	310,000
Carbon Tetrachloride	0.47 J	157	667	2,000
Chlorobenzene	3.2	1,733	7,333	22,000
Chlorodifluoromethane	0.88	173,333	7,333,333	22,000,000
Chloroethane	0.75	333,333	1,466,667	4,400,000
Chloroform	0.75 J	40	177	530
Chloromethane	6.1	3,133	13,000	39,000
Cyclohexane	7.4	210,000	866,667	2,600,000
Dichlorodifluoromethane	5.5	3,333	14,667	44,000
Ethylbenzene	3.3	367	1,633	4,900
Heptane	11	NS	NS	NS
Hexane	20	24,333	103,333	310,000
Isopropylbenzene (cumene)	0.33 J	14,000	60,000	180,000
Dichloromethane (Methylene Chloride)	1.4 JB	21,000	86,667	260,000
m,p-Xylene	4.9	3,333	14,667	44,000
Xylene, o-	2.0	3,333	14,667	44,000
Propylbenzene	0.54 J	3,333	146,667	440,000
Tetrachloroethene	38	1,400	6,000	18,000
Toluene	21	173,333	733,333	2,200,000
Trichlorofluoromethane	1.3	24,333	103,333	310,000

Notes:

Residential SS VRSL: Wisconsin Sub-Slab Vapor Risk Screening Level, Residential and Small Commercial Buildings with pertinent attenuation factor applied.

Small Commercial SS VRSL: Wisconsin Sub-Slab Vapor Risk Screening Level, Small Commercial Buildings with pertinent attenuation factor applied.

Large Commercial SS VRSL: Wisconsin Sub-Slab Vapor Risk Screening Level, Large Commercial Buildings with pertinent attenuation factor applied.

VOCs: Volatile Organic Compounds

$\mu\text{g}/\text{m}^3$: Micrograms per cubic meter

NS: No Established Standard

J: Concentration reported between the laboratory method detection limit and the reporting limit.

Attachment B: Figures

Figure B.1.a

Included

Figure B.1.b

Included

Figure B.1.c

Included

Figure B.2.a

Not Included. No CVOC analyses performed as initial site focus was on petroleum.

Figure B.2.b

Not included. No remediation occurred pertinent to the CVOC release.

Figure B.3.a

Included

Figure B.3.b

Included

Figure B.3.c

Included

Figure B.3.d

Included

Figure B.4.a

Included

Figure B.4.b

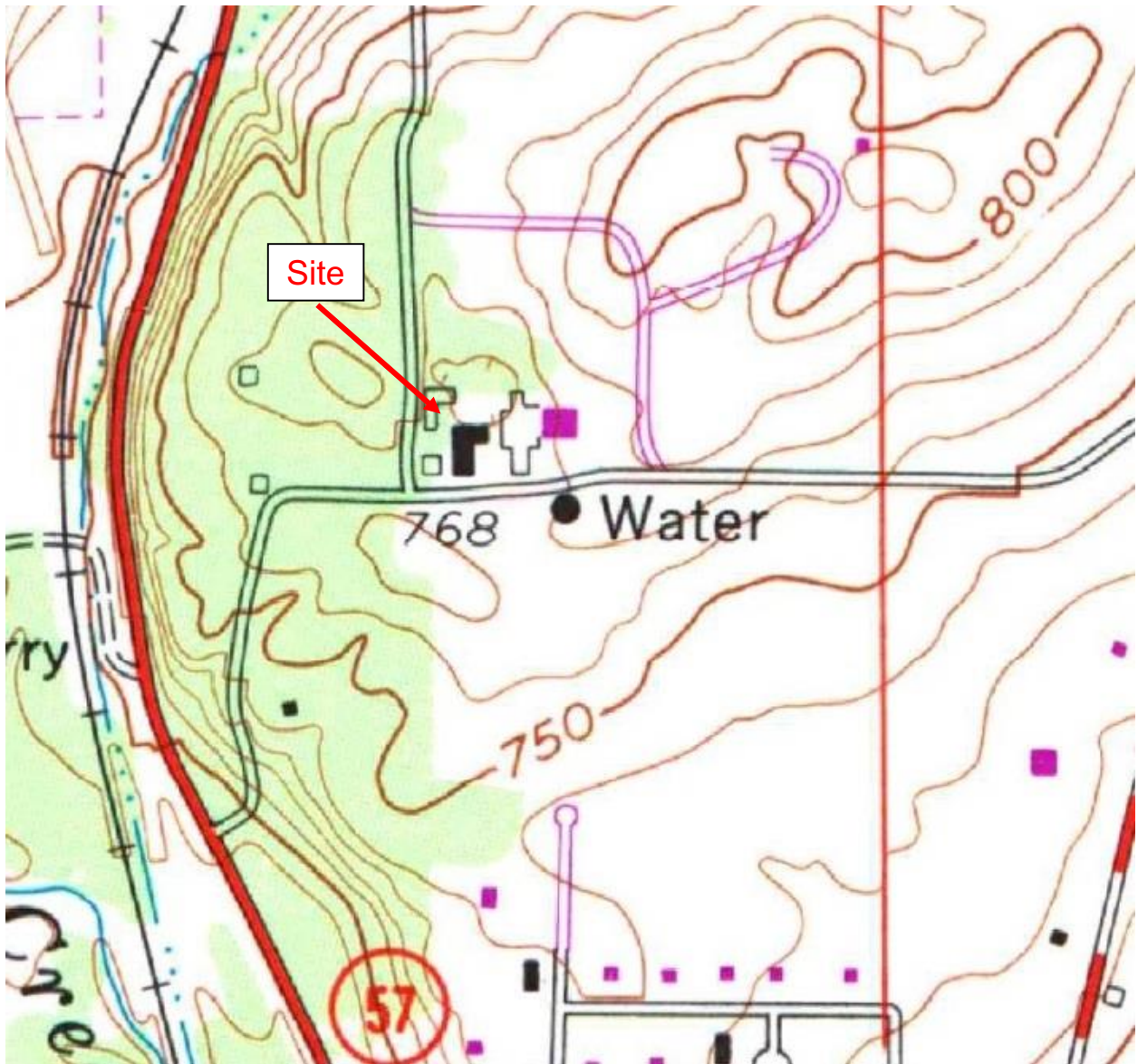
Additional figures of vapor intrusion, other media, or other maps/figures were not deemed necessary for the case closure/GIS registry request.

Figure B.4.c

Not included as no other data pertinent to this category is available.

Figure B.5

No photos were included because there were no structural impediment features which prevented the completion of the site investigation or remediation.



Source: USGS Cedarburg, Wisconsin (1959, revised 1994) 7.5-Minute Series (topographic) Quadrangle Map

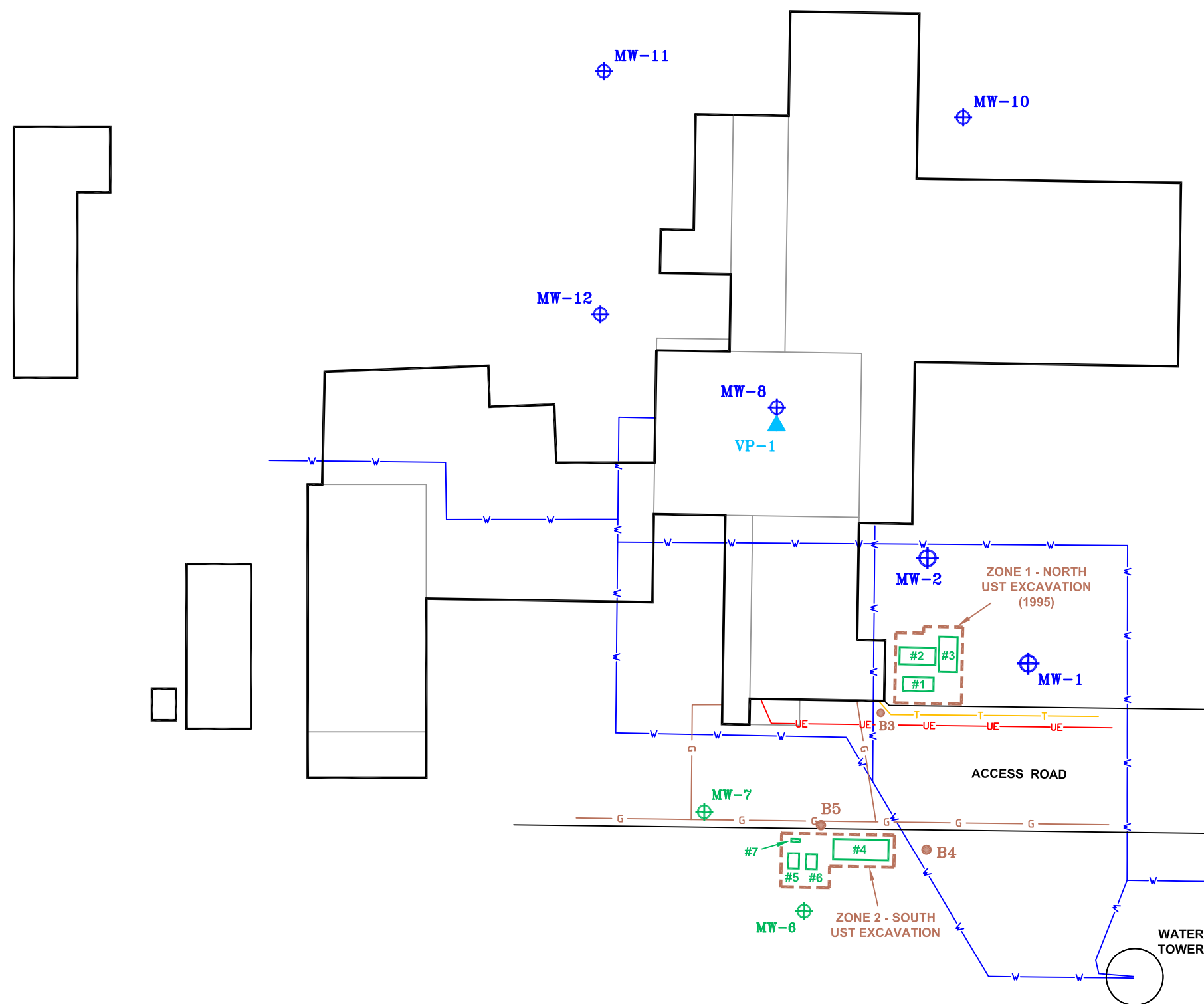
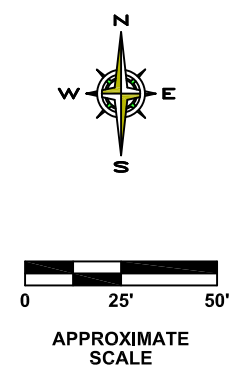
Scale: 1:24,000
 Contour Interval: 10 Feet

**FIGURE B.1.a
 SITE LOCATION MAP**

**Fromm Family Foods, Inc.
 13145 Green Bay Road
 Mequon, Wisconsin
 Project No. 1E-1205015**



GILES
 ENGINEERING ASSOCIATES, INC.



UST INVENTORY:

#1	FORMER 2,000-GALLON DIESEL FUEL UST
#2	FORMER 4,000-GALLON HEATING OIL UST
#3	FORMER 4,000-GALLON HEATING OIL UST
#4	FORMER 8,000-GALLON GASOLINE UST
#5	FORMER 550-GALLON GASOLINE UST
#6	FORMER 550-GALLON GASOLINE UST
#7	FORMER DISPENSER ISLAND

LEGEND:

	SOIL VAPOR PROBE
	GROUNDWATER MONITORING WELL (BY ENVIRONMENTAL ASSOCIATES, INC.)
	FORMER GROUNDWATER MONITORING WELL (BY ENVIRONMENTAL ASSOCIATES, INC.)
	SOIL BORING (BY ENVIRONMENTAL ASSOCIATES, INC.)
	UNDERGROUND ELECTRIC LINE
	WATER LINE
	TELECOMMUNICATIONS LINE
	GAS LINE

GILES ENGINEERING ASSOCIATES, INC.
 N8 W22350 JOHNSON DRIVE, SUITE A1
 WAUKESHA, WI 53186 (262)544-0118

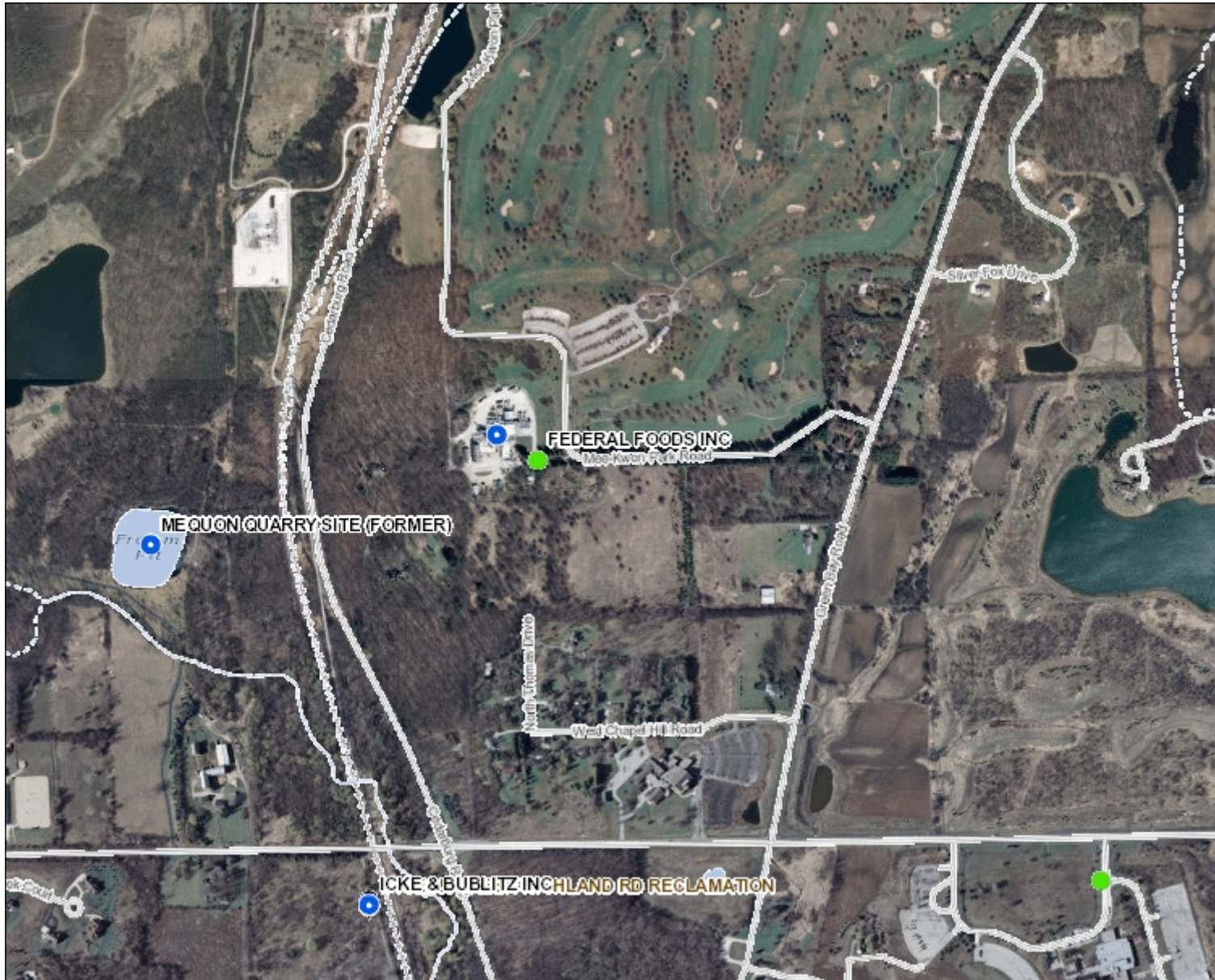
FIGURE B.1.b
 SITE PLAN
 FROMM FAMILY FOODS
 13145 N. GREEN BAY ROAD
 MEQUON, WISCONSIN

DESIGNED	DRAWN	SCALE	DATE	REVISED
KTB	JSZ	approx. 1"=50'	04-18-16	--
PROJECT NO.: 1E-1205015			CAD No. 1E1205015A	

NOTES:
 1.) ALL SITE FEATURES ARE APPROXIMATE BASED ON THE "ESTIMATE EXTENT OF PCE GROUNDWATER CONTAMINATION" DATED 4-6-06, PREPARED BY ENVIRONMENTAL ASSOCIATES, INC.



BRRTS Sites Within 0.5 mi of Fromm Site



Legend

- Open Site (ongoing cleanup)
- Open Site Boundary
- Closed Site (completed cleanup)
- Closed Site Boundary
- Groundwater Contamination
- Soil Contamination
- Groundwater and Soil Contamination
- Contamination From Another Property
- 📍 Dryclean Environmental Response Fund (DERF)
- 🌳 Green Space Grant (2004-2009)
- 📍 Ready for Reuse
- 📍 Site Assessment Grant (2001-2009)
- 📍 State Funded Response
- 📍 Sustainable Urban Development Zone (SUDZ)
- ▼ General Liability Clarification Letters
- ▼ Superfund NPL
- ▼ Voluntary Party Liability Exemption
- Rivers and Streams
- Open Water
- Municipality
- State Boundaries
- County Boundaries
- Major Roads**
- Interstate Highway
- State Highway
- US Highway

0.3 0 0.17 0.3 Miles

NAD_1983_HARN_Wisconsin_TM

© Latitude Geographics Group Ltd.

1: 10,717



DISCLAIMER: The information shown on these maps has been obtained from various sources, and are of varying age, reliability and resolution. These maps are not intended to be used for navigation, nor are these maps an authoritative source of information about legal land ownership or public access. No warranty, expressed or implied, is made regarding accuracy, applicability for a particular use, completeness, or legality of the information depicted on this map. For more information, see the DNR Legal Notices web page: <http://dnr.wi.gov/org/legal/>

Note: Not all sites are mapped.

Notes



APPROXIMATE SCALE

NOTES:

- 1.) BASE MAP DEVELOPED FROM A MAP ON THE ON THE WEB BRRTS TRACKING SYSTEM.

Legend

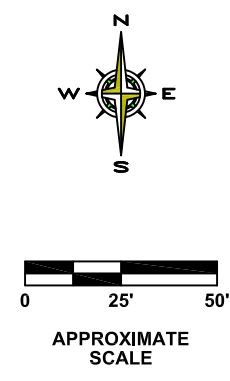
- Open Site (ongoing cleanup)
- Closed Site (completed cleanup)



GILES ENGINEERING ASSOCIATES, INC.
 N8 W22350 JOHNSON DRIVE, SUITE A1
 WAUKESHA, WI 53186 (262)544-0118

FIGURE B.1.c
BRRTS SITE MAP
FROMM FAMILY FOODS
13145 N. GREEN BAY ROAD
MEQUON, WISCONSIN

DESIGNED	DRAWN	SCALE	DATE	REVISED
KTB	JSZ	approx. 1"=1,000'	05-12-16	--
PROJECT NO.: 1E-1205015			CAD No. 1E1205015H	

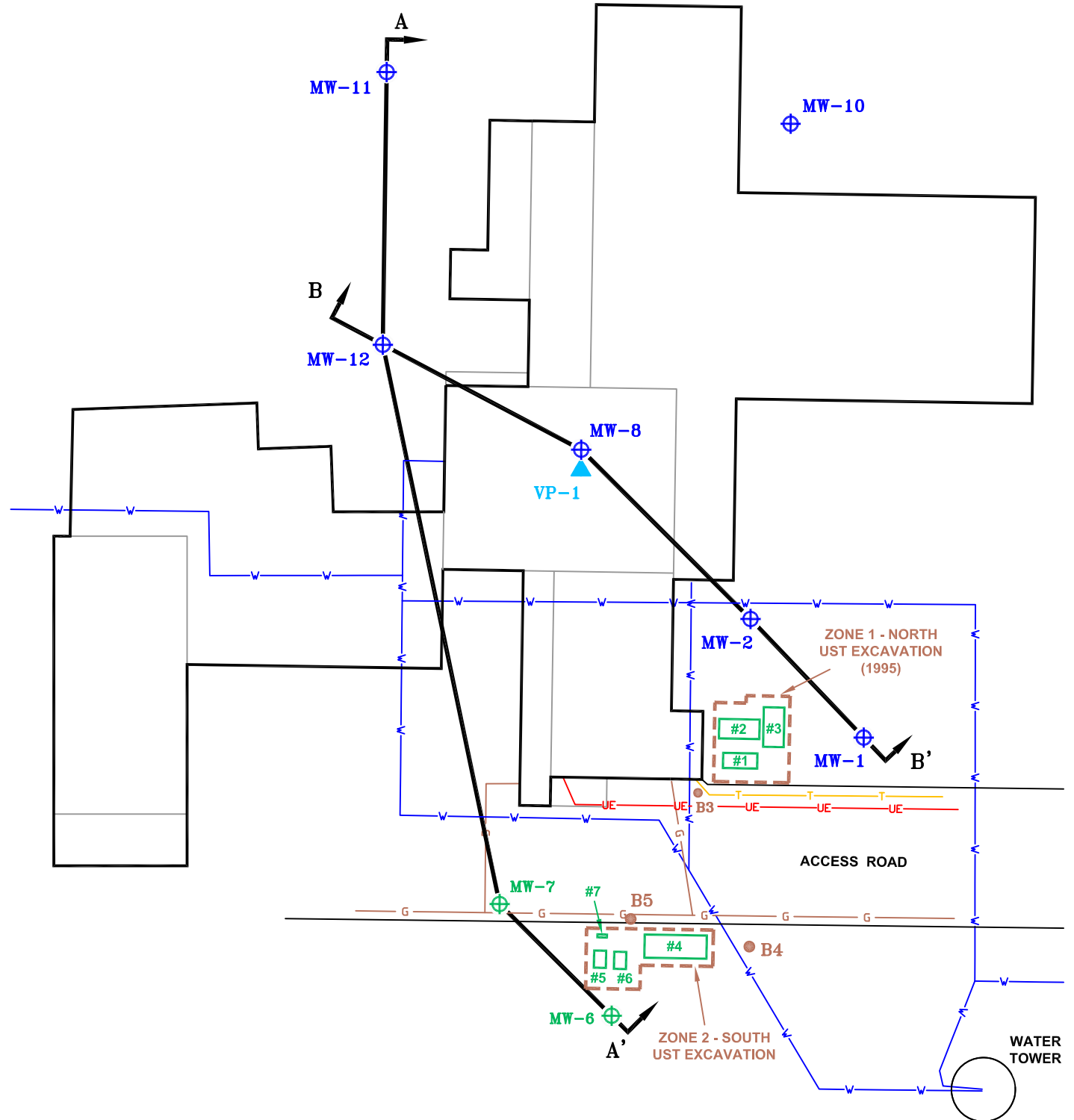


UST INVENTORY:

#1	FORMER 2,000-GALLON DIESEL FUEL UST
#2	FORMER 4,000-GALLON HEATING OIL UST
#3	FORMER 4,000-GALLON HEATING OIL UST
#4	FORMER 8,000-GALLON GASOLINE UST
#5	FORMER 550-GALLON GASOLINE UST
#6	FORMER 550-GALLON GASOLINE UST
#7	FORMER DISPENSER ISLAND

LEGEND:

	LINE OF CROSS-SECTION
	SOIL VAPOR PROBE
	GROUNDWATER MONITORING WELL (BY ENVIRONMENTAL ASSOCIATES, INC.)
	FORMER GROUNDWATER MONITORING WELL (BY ENVIRONMENTAL ASSOCIATES, INC.)
	SOIL BORING (BY ENVIRONMENTAL ASSOCIATES, INC.)
	UNDERGROUND ELECTRIC LINE
	WATER LINE
	TELECOMMUNICATIONS LINE
	GAS LINE



NOTES:
1.) ALL SITE FEATURES ARE APPROXIMATE BASED ON THE "ESTIMATE EXTENT OF PCE GROUNDWATER CONTAMINATION" DATED 4-6-06, PREPARED BY ENVIRONMENTAL ASSOCIATES, INC.

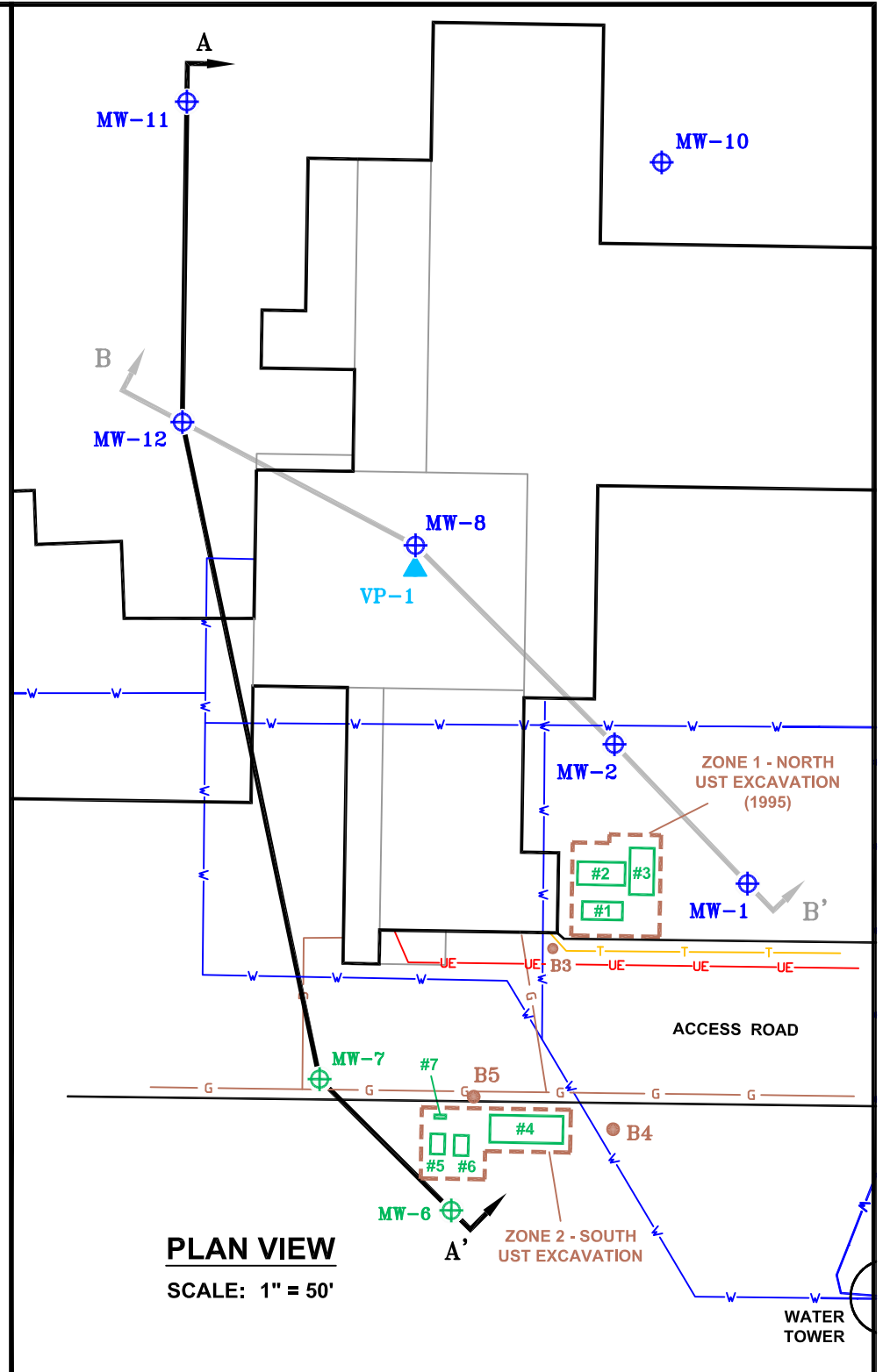
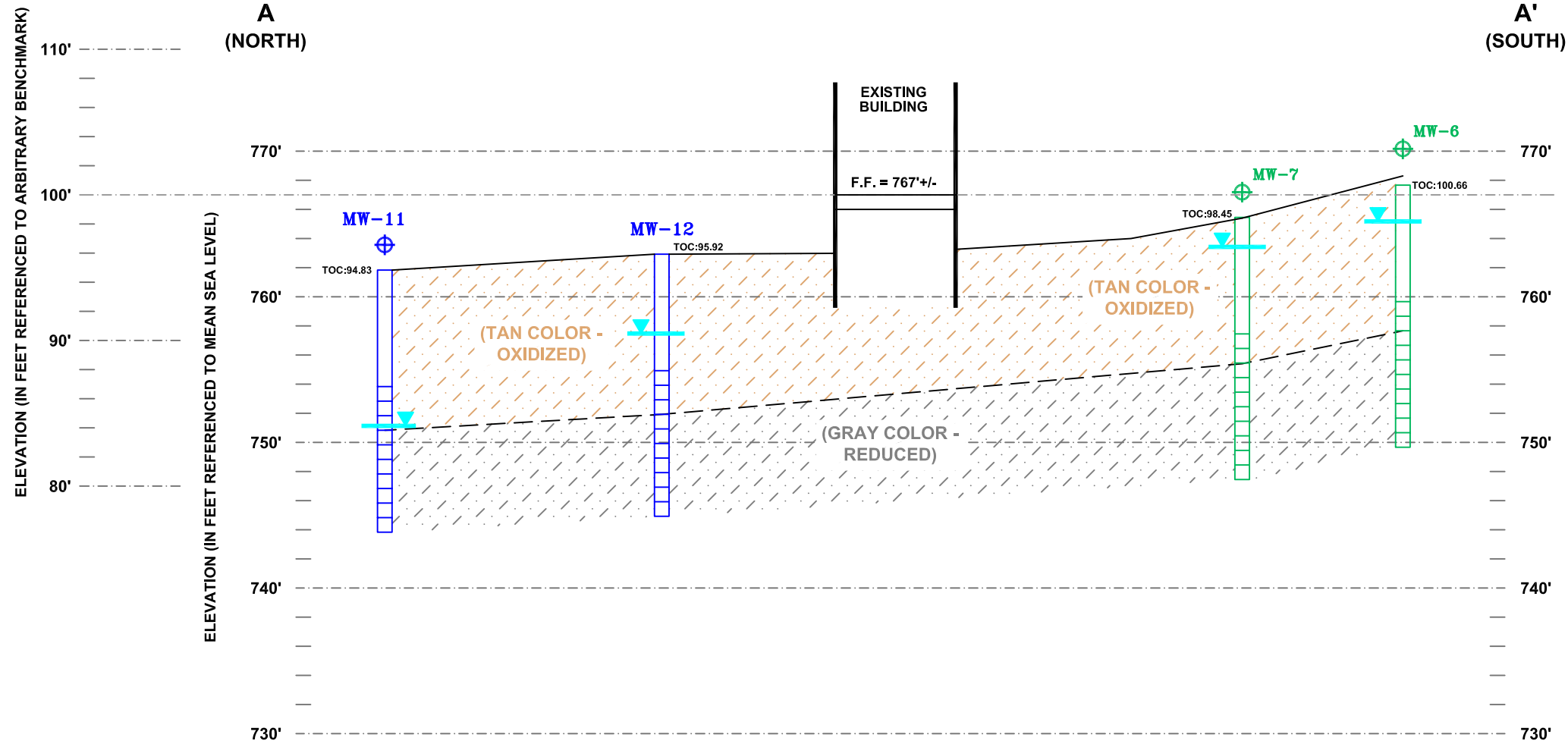
GILES ENGINEERING ASSOCIATES, INC.
N8 W22350 JOHNSON DRIVE, SUITE A1
WAUKESHA, WI 53186 (262)544-0118

**FIGURE B.3.a(1)
CROSS-SECTION LOCATION PLAN
FROMM FAMILY FOODS
13145 N. GREEN BAY ROAD
MEQUON, WISCONSIN**

DESIGNED	DRAWN	SCALE	DATE	REVISED
KTB	JSZ	approx. 1"=50'	04-18-16	--
PROJECT NO.: 1E-1205015			CAD No. 1E1205015B	

CROSS SECTION A-A'

SCALE: VERTICAL 1" = 10'
HORIZONTAL 1" = 50'



LEGEND:

	MW-11 GROUNDWATER MONITORING WELL (MW-6 & MW-7 ARE FORMER)
	WELL SCREEN
	HIGHEST RECORDED GROUNDWATER LEVEL
	CLAYEY-SILT WITH TRACE PEBBLES (OAK CREEK TILL)
	SOIL CONTACT LINES ARE INFERRED

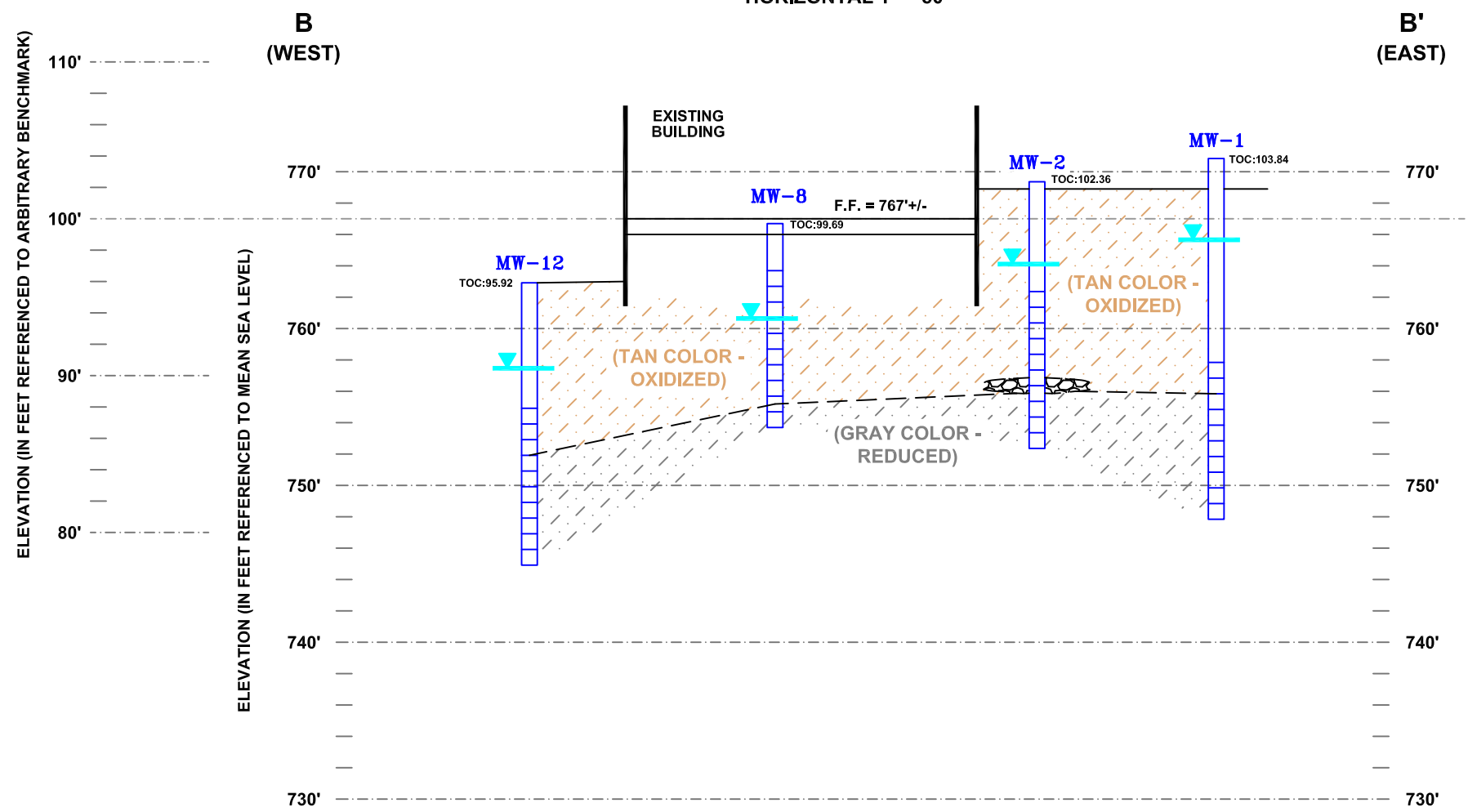
GILES ENGINEERING ASSOCIATES, INC.
N8 W22350 JOHNSON DRIVE, SUITE A1
WAUKESHA, WI 53186 (262)544-0118

FIGURE B.3.a(2)
CROSS-SECTION A - A'
FROMM FAMILY FOODS
13145 N. GREEN BAY ROAD
MEQUON, WISCONSIN

DESIGNED	DRAWN	SCALE	DATE	REVISED
KTB	JSZ	SEE TITLE	05-17-16	--
PROJECT NO.: 1E-1205015			CAD No. 1E1205015C	

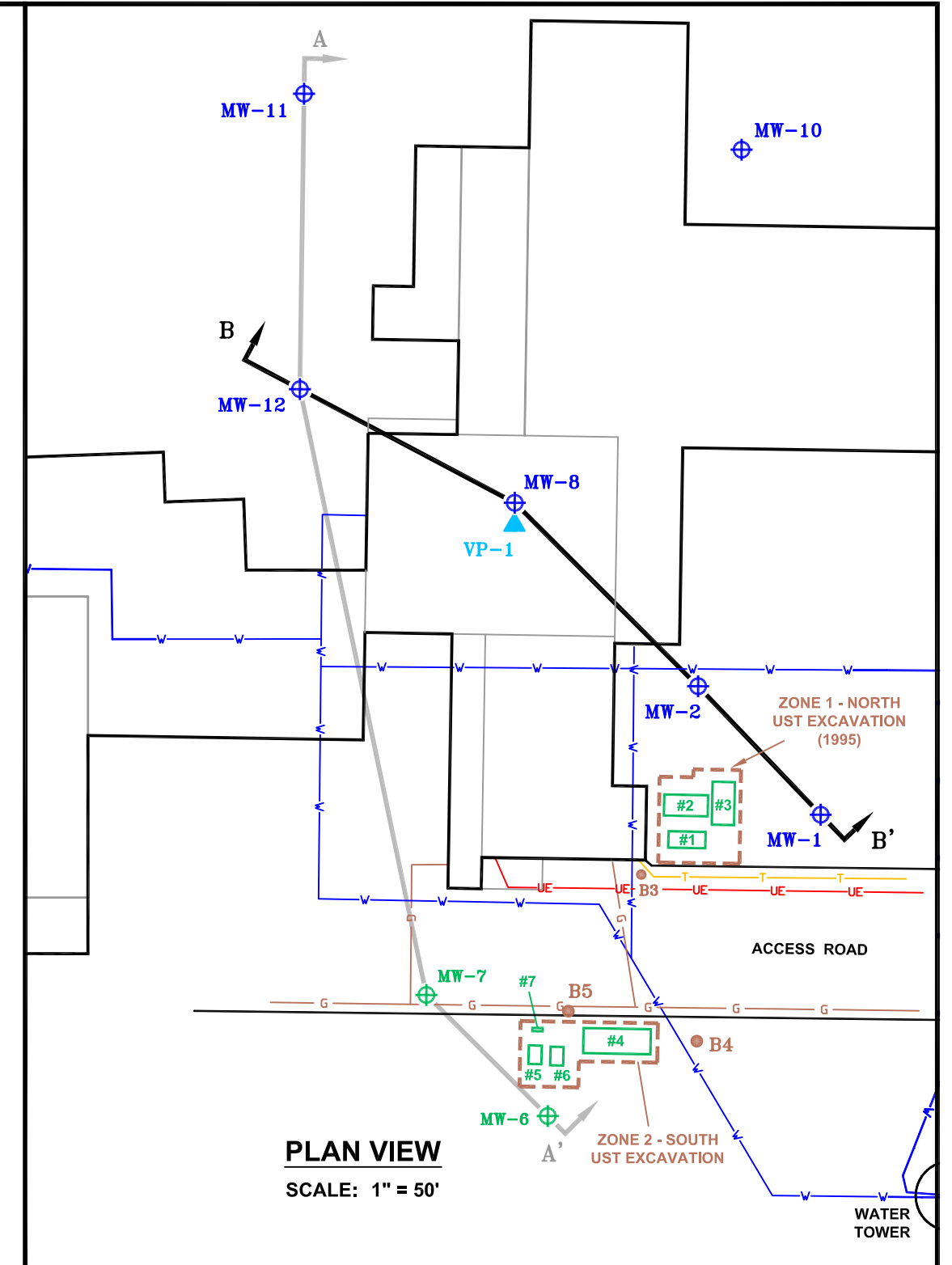
CROSS SECTION B-B'

SCALE: VERTICAL 1" = 10'
HORIZONTAL 1" = 50'



LEGEND:

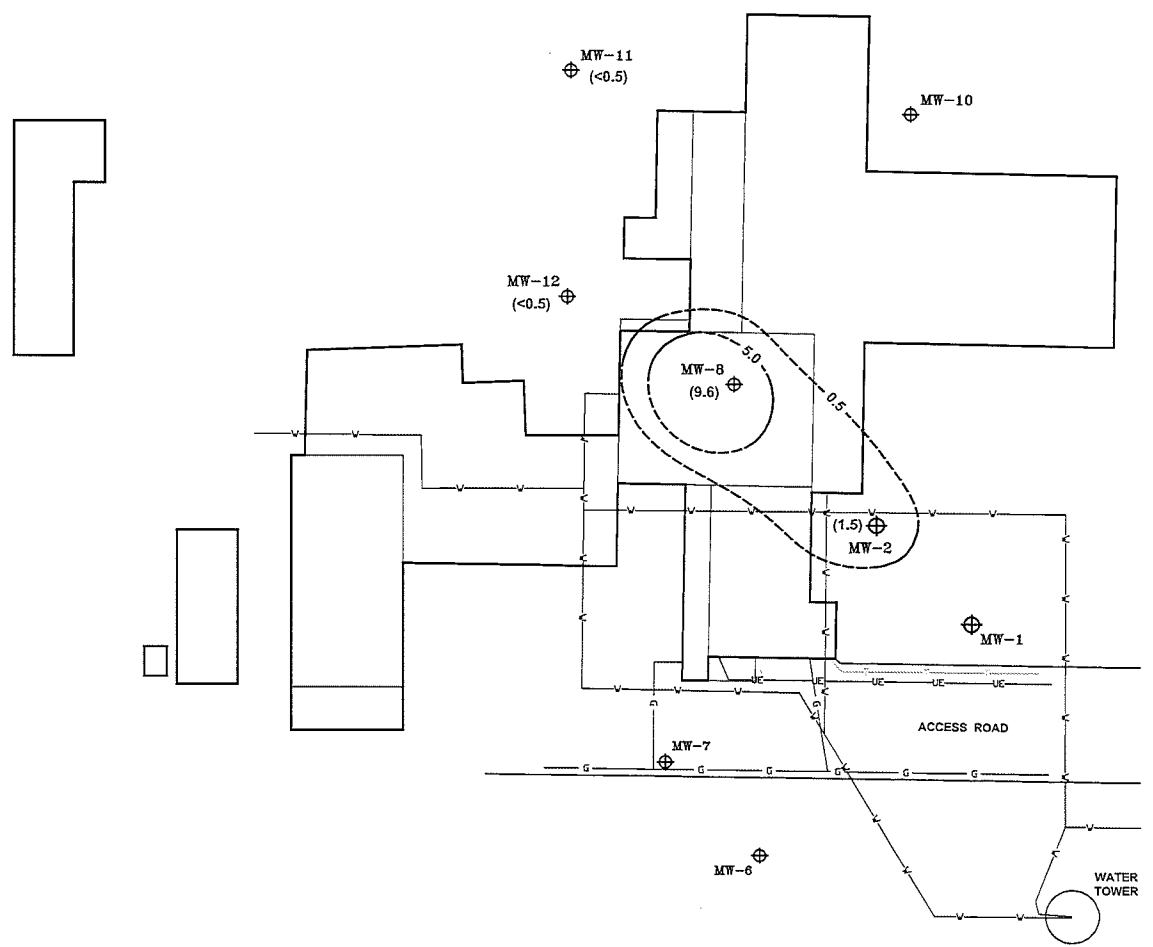
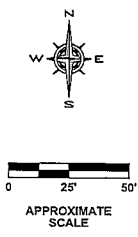
- MW-1** GROUNDWATER MONITORING WELL (MW-6 & MW-7 ARE FORMER)
- WELL SCREEN
- HIGHEST RECORDED GROUNDWATER LEVEL
- CLAYEY-SILT WITH TRACE PEBBLES (OAK CREEK TILL)
- GRAVEL
- SOIL CONTACT LINES ARE INFERRED



GILES ENGINEERING ASSOCIATES, INC.
N8 W22350 JOHNSON DRIVE, SUITE A1
WAUKESHA, WI 53186 (262)544-0118

FIGURE B.3.a(3)
CROSS-SECTION B - B'
FROMM FAMILY FOODS
13145 N. GREEN BAY ROAD
MEQUON, WISCONSIN

DESIGNED	DRAWN	SCALE	DATE	REVISED
KTB	JSZ	SEE TITLE	05-17-16	--
PROJECT NO.: 1E-1205015			CAD No. 1E1205015D	



LEGEND:

(9.6)	TETRACHLOROETHYLENE (PCE) CONCENTRATION IN ug/L (SAMPLED 3-29-06)
5.0	EQUICONCENTRATION CONTOUR IN ug/L FOR TETRACHLOROETHYLENE (PCE) (SAMPLED 3-29-06) (DASHED WHERE INFERRED)
	GROUNDWATER MONITORING WELL (BY ENVIRONMENTAL ASSOCIATES, INC.)
	FORMER GROUNDWATER MONITORING WELL (BY ENVIRONMENTAL ASSOCIATES, INC.)
	UNDERGROUND ELECTRIC LINE
	WATER LINE
	TELECOMMUNICATIONS LINE
	GAS LINE

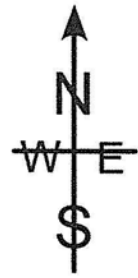
GILES ENGINEERING ASSOCIATES, INC.
 N8 W22350 JOHNSON DRIVE, SUITE A1
 WAUKESHA, WI 53186 (262)544-0118

FIGURE B.3.b
 EQUICONCENTRATION MAP FOR TETRACHLOROETHYLENE (PCE)
 FROMM FAMILY FOODS
 13145 N. GREEN BAY ROAD
 MEQUON, WISCONSIN

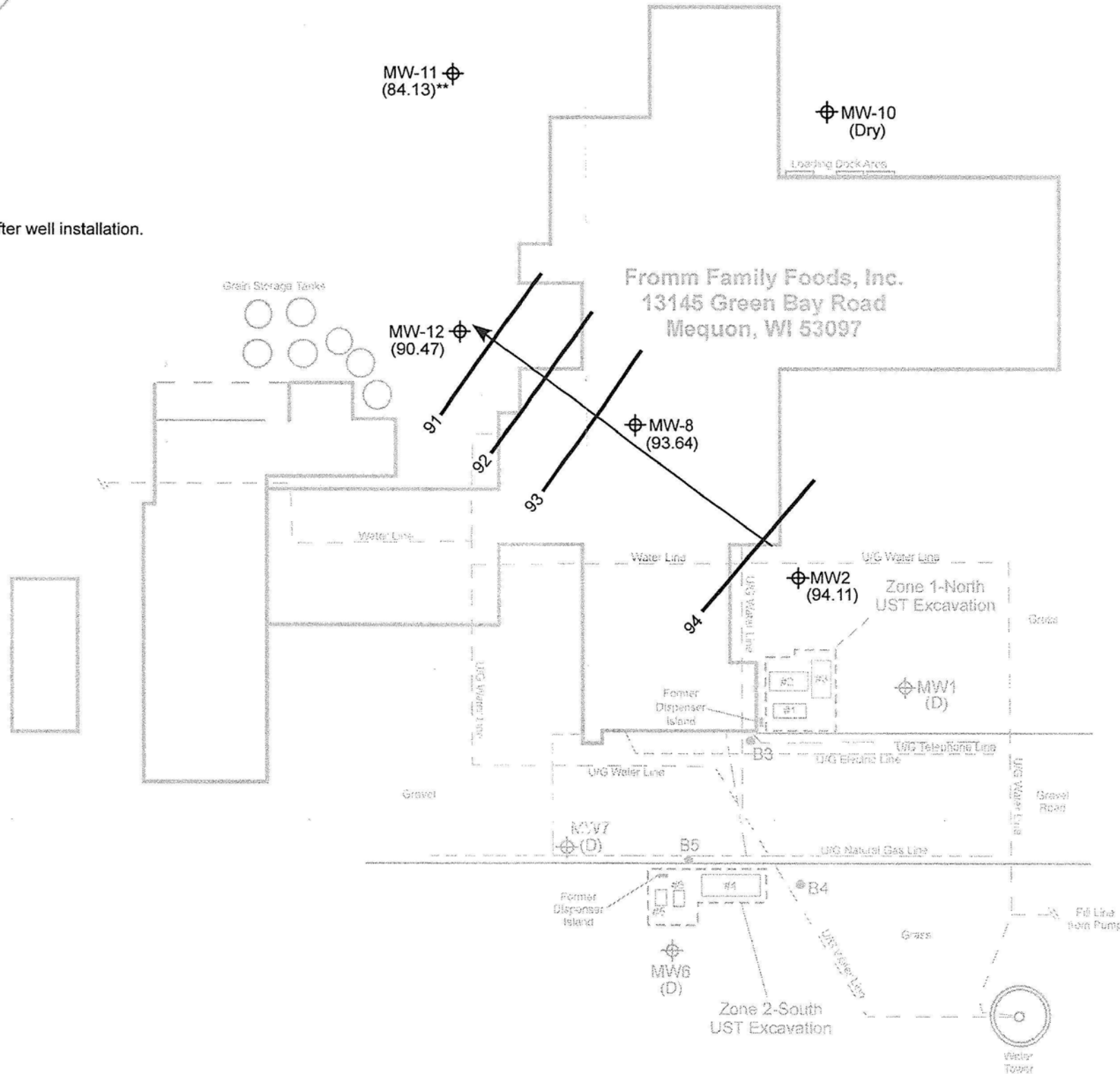
DESIGNED	DRAWN	SCALE	DATE	REVISED
KTB	JSZ	approx. 1"=50'	06-20-16	--

PROJECT NO.: 1E-1205015 CAD No. 1E1205015I

NOTES:
 1.) ALL SITE FEATURES ARE APPROXIMATE BASED ON THE
 "ESTIMATE EXTENT OF PCE GROUNDWATER CONTAMINATION"
 DATED 4-6-06, PREPARED BY ENVIRONMENTAL ASSOCIATES, INC.



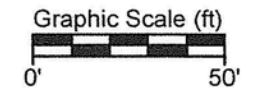
** Elevation not used-water level not yet at static level after well installation.



LEGEND

- B4 ● Soil Boring Location
- MW8 ⊕ Groundwater Monitoring Well
- (D) Well Destroyed
- (93.64) Groundwater Elevation (ft)
- ← Groundwater Flow Direction

UST Inventory:
 Tank #1 : 2,000 Gal. Diesel Fuel
 Tank #2 : 4,000 Gal. Heating Oil
 Tank #3 : 4,000 Gal. Heating Oil
 Tank #4 : 8,000 Gal. Gasoline
 Tank #5 : 550 Gal. Gasoline
 Tank #6 : 550 Gal. Gasoline



Notes:

1. Fromm Family Foods, Inc. is located at 13145 N. Green Bay Road in the City of Mequon, Ozaukee County, Wisconsin in the SW 1/4 of the NE 1/4 of Section 10, Township 9N, Range 21E of the Cedarburg 7.5 minute quadrangle map.
2. The base map was prepared from field measurements conducted by Environmental Associates, Inc.
3. The groundwater monitoring wells were installed by Environmental Associates, Inc. as part of a site environmental investigation.

NOTES:

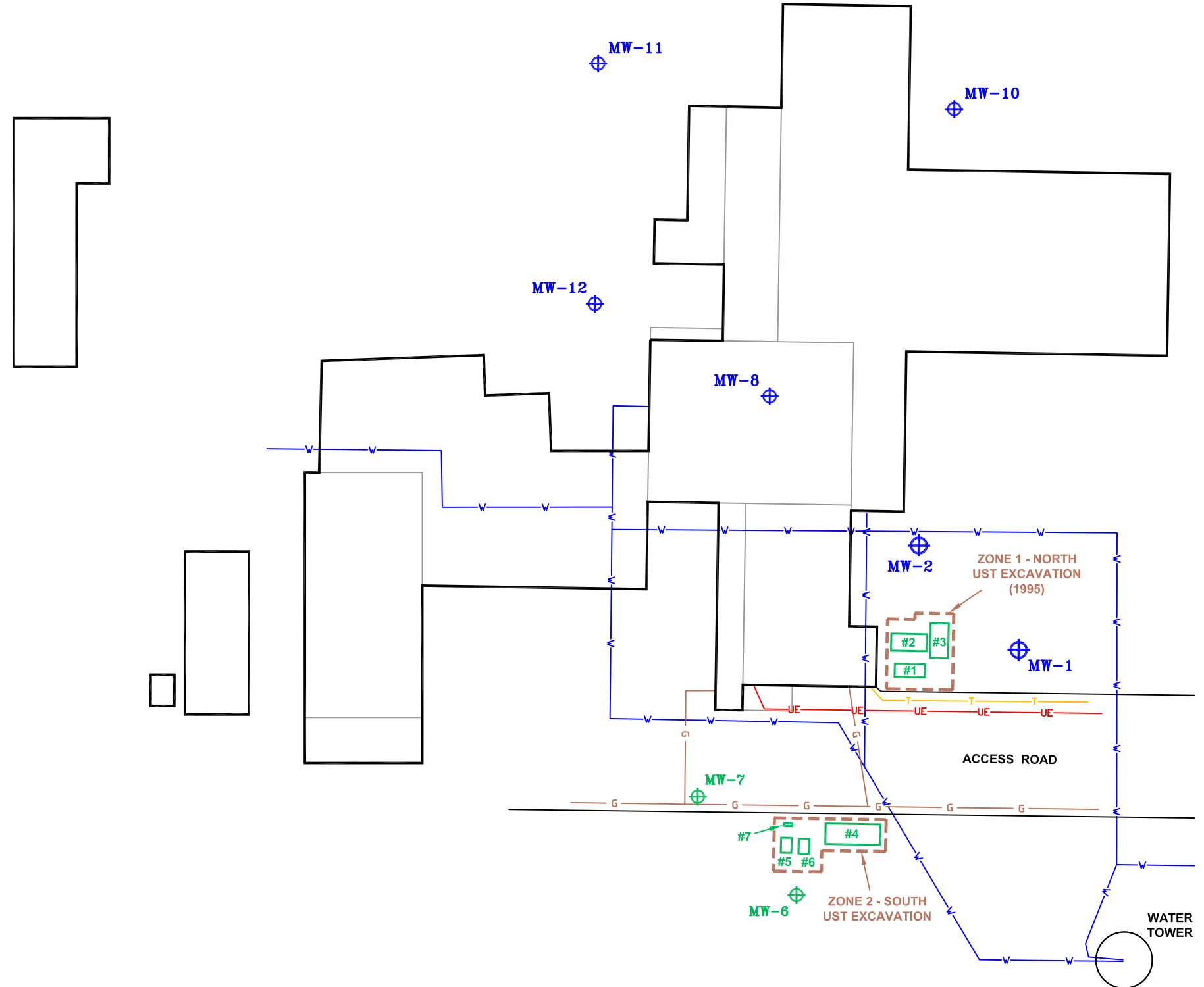
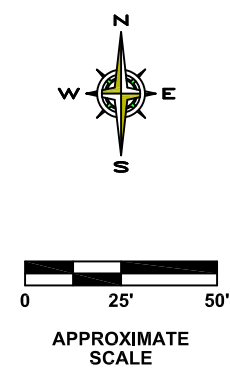
- 1.) BASE MAP DEVELOPED FROM THE "GROUNDWATER ELEVATIONS AND FLOW DIRECTION (MARCH 29, 2006)", DATED 3-30-06, PREPARED BY ENVIRONMENTAL ASSOCIATES, INC.



GILES ENGINEERING ASSOCIATES, INC.
 N8 W22350 JOHNSON DRIVE, SUITE A1
 WAUKESHA, WI 53186 (262)544-0118

FIGURE B.3.c
 GROUNDWATER FLOW MAP (3-29-16)
 FROMM FAMILY FOODS
 13145 N. GREEN BAY ROAD
 MEQUON, WISCONSIN

DESIGNED	DRAWN	SCALE	DATE	REVISED
KTB	JSZ	approx. 1"=50'	05-12-16	--
PROJECT NO.: 1E-1205015			CAD No. 1E1205015E	



UST INVENTORY:

#1	FORMER 2,000-GALLON DIESEL FUEL UST
#2	FORMER 4,000-GALLON HEATING OIL UST
#3	FORMER 4,000-GALLON HEATING OIL UST
#4	FORMER 8,000-GALLON GASOLINE UST
#5	FORMER 550-GALLON GASOLINE UST
#6	FORMER 550-GALLON GASOLINE UST
#7	FORMER DISPENSER ISLAND

LEGEND:

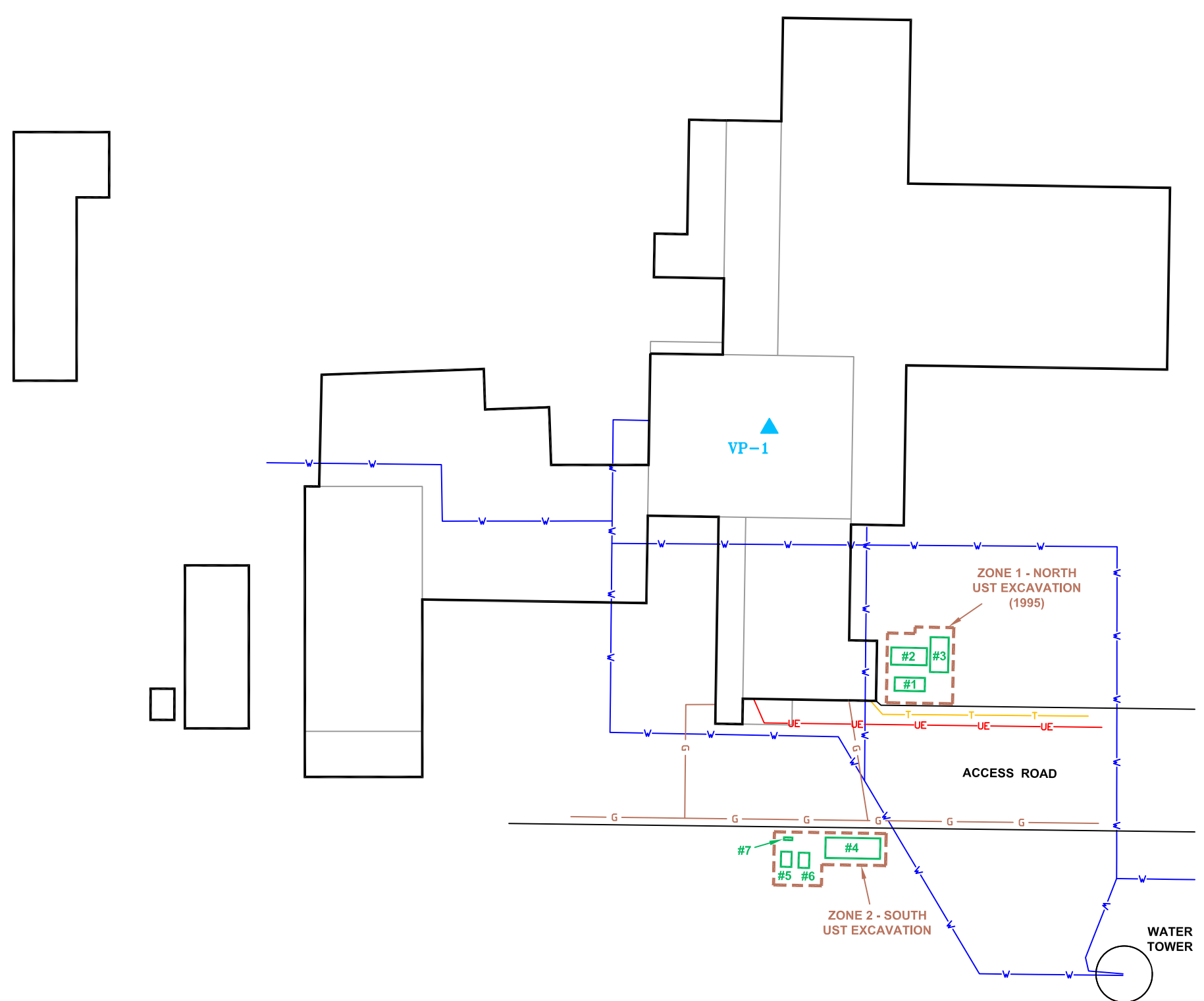
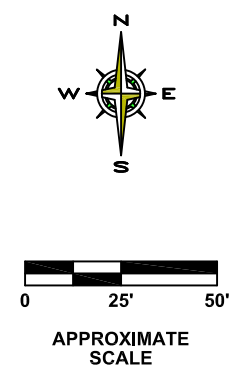
	MW-2	GROUNDWATER MONITORING WELL (BY ENVIRONMENTAL ASSOCIATES, INC.)
	MW-1	FORMER GROUNDWATER MONITORING WELL (BY ENVIRONMENTAL ASSOCIATES, INC.)
	UE	UNDERGROUND ELECTRIC LINE
	W	WATER LINE
	T	TELECOMMUNICATIONS LINE
	G	GAS LINE

GILES ENGINEERING ASSOCIATES, INC.
 N8 W22350 JOHNSON DRIVE, SUITE A1
 WAUKESHA, WI 53186 (262)544-0118

FIGURE B.3.d
 SITE MONITORING WELLS
 FROMM FAMILY FOODS
 13145 N. GREEN BAY ROAD
 MEQUON, WISCONSIN

DESIGNED	DRAWN	SCALE	DATE	REVISED
KTB	JSZ	approx. 1"=50'	04-18-16	--
PROJECT NO.: 1E-1205015			CAD No. 1E1205015F	

NOTES:
 1.) ALL SITE FEATURES ARE APPROXIMATE BASED ON THE "ESTIMATE EXTENT OF PCE GROUNDWATER CONTAMINATION" DATED 4-6-06, PREPARED BY ENVIRONMENTAL ASSOCIATES, INC.



UST INVENTORY:

#1	FORMER 2,000-GALLON DIESEL FUEL UST
#2	FORMER 4,000-GALLON HEATING OIL UST
#3	FORMER 4,000-GALLON HEATING OIL UST
#4	FORMER 8,000-GALLON GASOLINE UST
#5	FORMER 550-GALLON GASOLINE UST
#6	FORMER 550-GALLON GASOLINE UST
#7	FORMER DISPENSER ISLAND

LEGEND:

	SOIL VAPOR PROBE
	UNDERGROUND ELECTRIC LINE
	WATER LINE
	TELECOMMUNICATIONS LINE
	GAS LINE

GILES ENGINEERING ASSOCIATES, INC.
 N8 W22350 JOHNSON DRIVE, SUITE A1
 WAUKESHA, WI 53186 (262)544-0118

FIGURE B.4.a
 SOIL VAPOR MAP
 FROMM FAMILY FOODS
 13145 N. GREEN BAY ROAD
 MEQUON, WISCONSIN

DESIGNED	DRAWN	SCALE	DATE	REVISED
KTB	JSZ	approx. 1"=50'	05-12-16	--
PROJECT NO.: 1E-1205015			CAD No. 1E1205015G	

NOTES:
 1.) ALL SITE FEATURES ARE APPROXIMATE BASED ON THE "ESTIMATE EXTENT OF PCE GROUNDWATER CONTAMINATION" DATED 4-6-06, PREPARED BY ENVIRONMENTAL ASSOCIATES, INC.

Documentation of Remedial Action (Attachment C)

DISCLAIMER

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

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



D.1 BARRIER MAINTENANCE PLAN

FROMM BROS. NIEMAN & CO
13145 Green Bay Road
Mequon, Wisconsin

BRRTs No. 02-46-000875
14-010-03-005.00

Introduction

As part of Wisconsin's geographic information system (GIS) closure requirements for this Site, residual soil contamination that *may* be present beneath the parcel must be isolated from direct human contact and infiltration of meteoric water limited. It should be noted that a specific source area for chlorinated volatile organic compounds (CVOCs), and the compound tetrachlorethylene (PCE) in particular, that is present in the groundwater at the location of monitoring well MW-8 has not been identified. The concentration of PCE in the groundwater collected from monitoring well MW-8 has been constant at approximately 8 micrograms per liter (ug/l) during four sampling events. The maximum contaminant level for PCE is 5 ug/l.

Purpose of the Barrier System

To minimize the potential for direct contact with potentially-impacted soil and to minimize the potential for the mobilization of CVOCs that may be in the soil through the infiltration of precipitation, it is recommended that the isolating building slab underlying Site Building #2 (see attached site plan) remain in place and its competency maintained.

This document is the Maintenance Plan for an engineered soil barrier system at the above-referenced property was prepared in accordance with the requirements of NR 724.13(2) of the Wisconsin Administrative Code.

The Site configuration and the location of the barrier slab to be maintained is depicted on Figure D.2.

Semi-Annual Inspection

The barrier system will be inspected for damage on a semi-annual basis and after extreme rainfall events or heavy equipment transit. Areas where contaminated soil has become or are likely to become exposed will be documented and the Site owner informed immediately. A log of the inspections and repairs will be maintained by the property owner. The format of inspection log is included as Exhibit B, *Barrier Inspection Log*. The log will include recommendations for necessary repair of any areas where underlying soil is exposed. Completed repairs will be documented in the inspection log.

Maintenance Activities

Repairs will be scheduled as soon as practical if damage to the Site barrier system is noted. Maintenance activities will include the following actions by cap/barrier system as outlined below:

1. Maintain the building and/or the building pad/slab over the known area of groundwater CVOOC impact (See attached Figure D.2)

The property owner will leave concrete the building pad/slab in place should razing of the building be performed. Maintenance activities associated with the concrete pad/slab barrier will entail sealing cracks to minimize the potential for water entering the subsurface. Maintenance of the pad/slab will be necessary should the building be razed. Sealers commonly consist of tar products and cement patch materials. Assessment of these surface will be performed on an annual basis.

An inspection log which will be used to record cap damage and subsequent repair is provided as Exhibit C of this document. Photographs of the Site caps/barriers are provided in Exhibit D.

The Site owner must inform maintenance workers of the direct contact exposure hazard and provide them with appropriate personal protection equipment ("PPE") in the event that necessary maintenance activities require exposure of the underlying impacted soil.

The owner must also sample any soil that is excavated from the site prior to disposal to ascertain if contamination is present and at what concentration. The soil must be treated, stored, and disposed of by the owner in accordance with applicable local, state and federal law.

In the event that components of the barrier system are removed or replaced, the replacement barrier must be equally impervious or thick. Any replacement barrier will be subject to the same maintenance and inspection guidelines as outlined in this Maintenance Plan unless indicated otherwise by the Wisconsin Department of Natural Resources ("WDNR") or its successor.

The property owner, in order to maintain the integrity of the cap/barrier surfaces, will maintain a copy of this Maintenance Plan on site and make it available to all interested parties (i.e. on-site employees, contractors, future property owners, etc.) for viewing.

Amendment or Withdrawal of Maintenance Plan

This Maintenance Plan can only be amended or withdrawn by the property owner and their successors with the written approval of WDNR.

**Prohibition of Activities and Notification of WDNR Prior to
Actions Affecting a Cover or Cap**

The following activities are prohibited on any portion of the property where the barrier system is required as shown on the attached map unless prior written approval has been obtained from the WDNR:

- 1) Removal of the existing barrier;
- 2) Replacement with another cap/barrier;
- 3) Excavating or grading of the land surface;
- 4) Filling on capped or paved areas;
- 5) Plowing for agricultural cultivation; or
- 6) Construction or placement of a building or other structure.

Contact Information

(May 2016)

Site Owner and Operator: Fromm Bros. Nieman Co.
13145 Green Bay Road
Mequon, Wisconsin 53092
262-242-2200
Attn: Mr. Tom Nieman

Consultant: Giles Engineering Associates, Inc.
N8 W22350 Johnson Drive, Suite A1
Waukesha, Wisconsin 53186
262-544-0118
Attn: Mr. Kevin Bugel, P.G., C.P.G.

WDNR: Wisconsin Dept. of Natural Resources
Waukesha Service Center
2300 N. Martin Luther King, Jr. Drive
Milwaukee, Wisconsin 53212
Attn: Mr. John Feeney

Exhibit A – Property Legal Description

Property Legal Description:

78/359 ALSO 04.1 13.1 14.3 COMM 423 FT S & 779 FT W OF E 1/4 PST TH S 45 FT W 11 FT S
194 FT W 439 FT N 170 FT W 50 FT N 579 FT E 533 FT SE 142 FT S 554 FT POB 9.95 ACS SEC
10 T 9 R 21

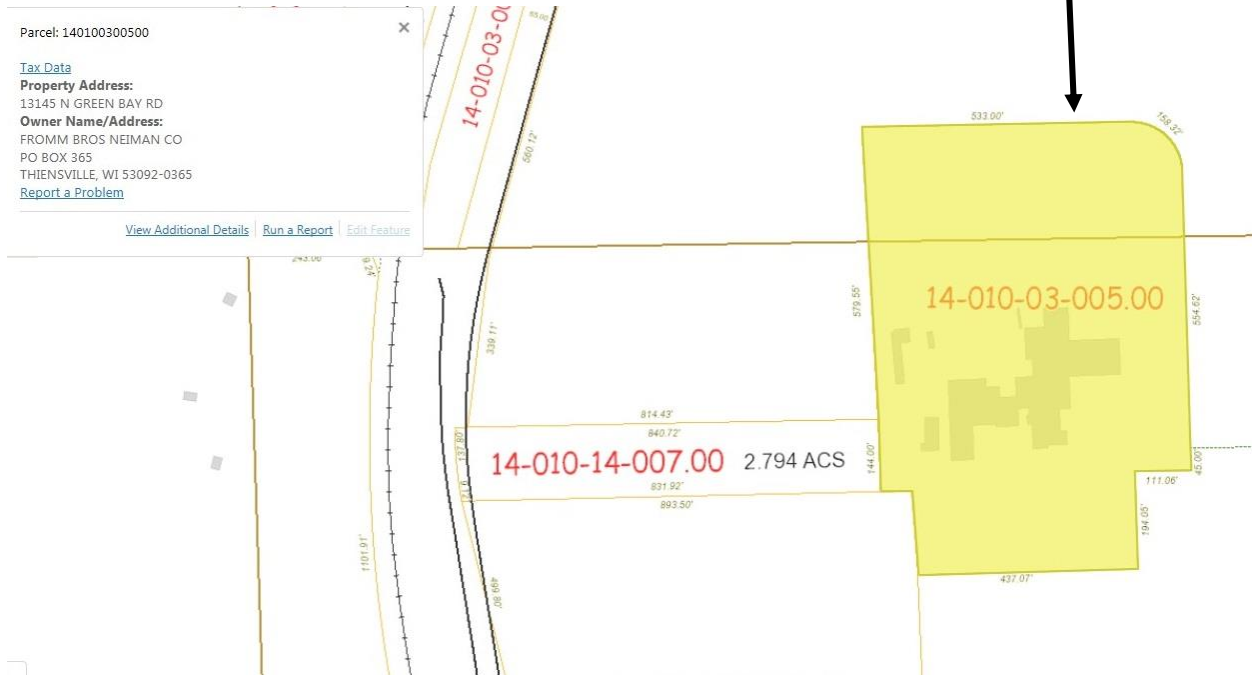


Exhibit B – Site Plan with Building Slab to be Maintained

Exhibit C – Barrier 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 FROMM BROS NIEMAN & CO	BRRTS No. 02-46-000875
---	----------------------------------

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 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 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 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 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 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

{Click to Add/Edit Image}

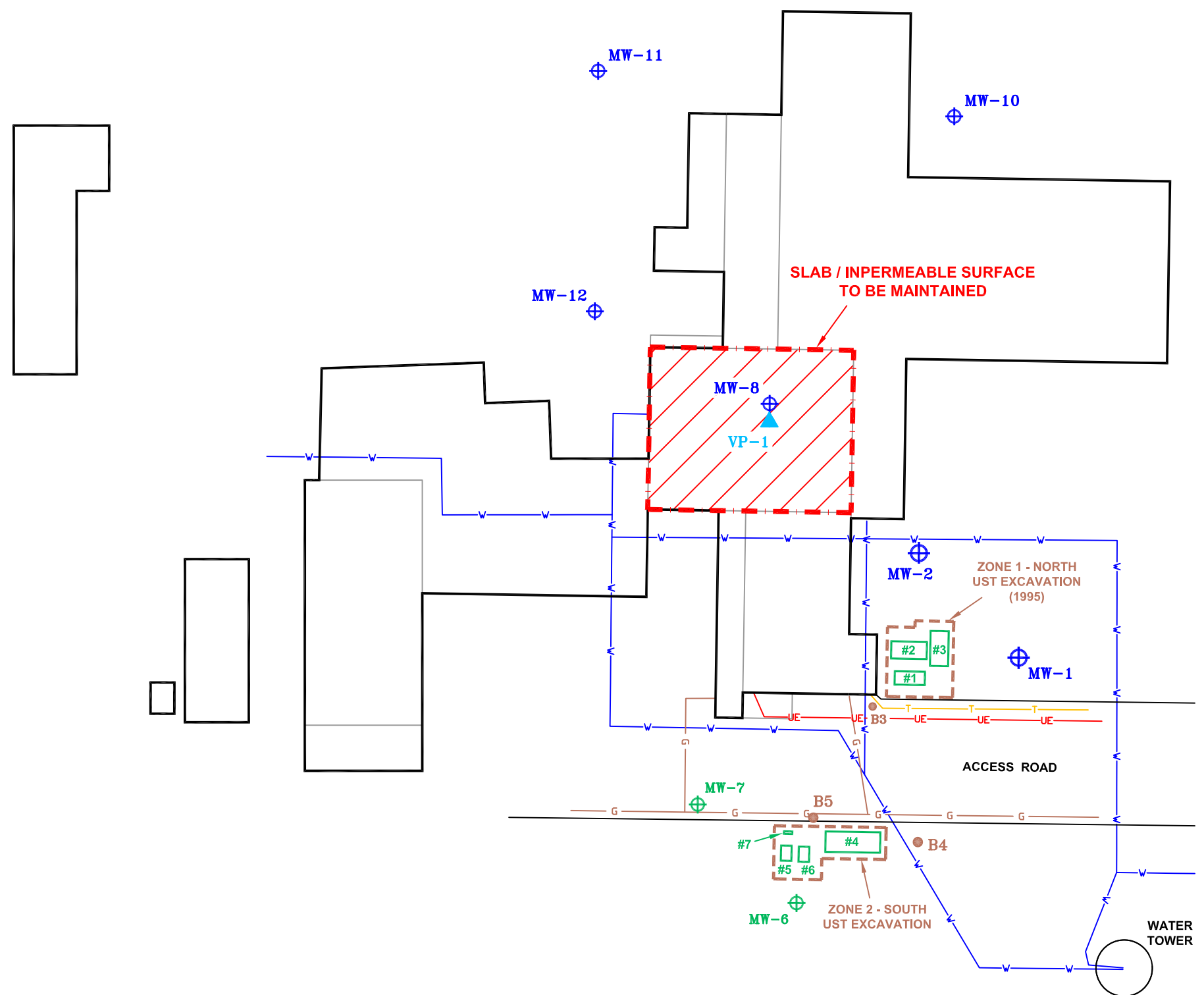
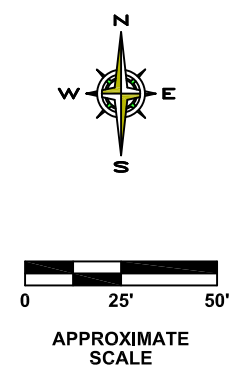
Date added:

Title:

{Click to Add/Edit Image}

Date added:

Title:



UST INVENTORY:

#1	FORMER 2,000-GALLON DIESEL FUEL UST
#2	FORMER 4,000-GALLON HEATING OIL UST
#3	FORMER 4,000-GALLON HEATING OIL UST
#4	FORMER 8,000-GALLON GASOLINE UST
#5	FORMER 550-GALLON GASOLINE UST
#6	FORMER 550-GALLON GASOLINE UST
#7	FORMER DISPENSER ISLAND

LEGEND:

	SOIL VAPOR PROBE
	GROUNDWATER MONITORING WELL (BY ENVIRONMENTAL ASSOCIATES, INC.)
	FORMER GROUNDWATER MONITORING WELL (BY ENVIRONMENTAL ASSOCIATES, INC.)
	SOIL BORING (BY ENVIRONMENTAL ASSOCIATES, INC.)
	UNDERGROUND ELECTRIC LINE
	WATER LINE
	TELECOMMUNICATIONS LINE
	GAS LINE

GILES ENGINEERING ASSOCIATES, INC.
 N8 W22350 JOHNSON DRIVE, SUITE A1
 WAUKESHA, WI 53186 (262)544-0118

EXHIBIT B
 SITE PLAN WITH SLAB TO BE MAINTAINED
 FROMM FAMILY FOODS
 13145 N. GREEN BAY ROAD
 MEQUON, WISCONSIN

DESIGNED	DRAWN	SCALE	DATE	REVISED
KTB	JSZ	approx. 1"=50'	05-17-16	--
PROJECT NO.: 1E-1205015			CAD No. 1E1205015exB	

NOTES:
 1.) ALL SITE FEATURES ARE APPROXIMATE BASED ON THE "ESTIMATE EXTENT OF PCE GROUNDWATER CONTAMINATION" DATED 4-6-06, PREPARED BY ENVIRONMENTAL ASSOCIATES, INC.

02-46-000875
BRRTS #

Fromm Family Foods, Inc., Mequon, Wisconsin
Activity (Site) Name

Attachment F: Source Legal Documents

F.1 Included

F.2 Included

F.3 Included

F.4 Included

A piece of land beginning at the center of the Green Bay Road on the north line of the North west Quarter of the Southwest Quarter (NW $\frac{1}{4}$ SW $\frac{1}{4}$) of Section Eleven (11) aforesaid, and two and forty-seven hundredths (2.47) chains west of the northeast corner of said Northwest Quarter of the Southwest Quarter (NW $\frac{1}{4}$ SW $\frac{1}{4}$) of Section Eleven (11) aforesaid; running thence east two and forty-seven hundredths (2.47) chains; thence south five and four hundredths (5.04) chains; thence west four and fifty-eight hundredths (4.58) chains to the center of the Green Bay Road; thence northerly along the center of said Green Bay Road five and fifty-six hundredths (5.56) chains to the place of beginning, containing one and three-fourths (1 $\frac{3}{4}$) acres of land; also,

The North Half of the Southeast Quarter of the Northwest Quarter (N $\frac{1}{2}$ SE $\frac{1}{4}$ NW $\frac{1}{4}$) and the south ten (10) acres of the Northeast Quarter of the Northwest Quarter (NE $\frac{1}{4}$ NW $\frac{1}{4}$), all of Section Eleven (11), Township Nine (9) North, Range Twenty-one (21) East, containing thirty (30) acres of land, more or less.

IN WITNESS WHEREOF, the said grantors have hereunto-set their hands and seals this 12th day of January, A.D. 1929.

SIGNED AND SEALED IN PRESENCE OF:

W.J. GRUETT
W.A. KOHLHOFF

EDWARD FROMM (SEAL)
ALICE FROMM (SEAL)
MAMIE FROMM (SEAL)
HENRY FROMM (SEAL)

STATE OF WISCONSIN)
MARATHON COUNTY)

Personally came before me, this 12th day of January A.D. 1929, the above named EDWARD FROMM and ALICE FROMM, his wife, and HENRY FROMM and MAMIE FROMM, his wife, to me known to be the persons who executed the foregoing instrument and acknowledged the same,

(Notarial Seal)

CHARLES F. SMITH
Notary Public, Marathon County, Wis.
My commission expires Sept. 15th, 1929.

Recorded Dec. 13-1929
at 1:10 o'clock P.M.
Wm. Ahlhauser, Register
Ada M. Ahlhauser, Deputy

FROMM BROS., INC.)
TO) NO. 99959 WARRANTY DEED
FROMM BROS., NIEMAN & CO.)

THIS INDENTURE, Made by FROMM BROS., INC., a corporation duly organized and existing under and by virtue of the laws of the State of Wisconsin, grantor, of Marathon County, Wisconsin, hereby CONVEYS AND WARRANTS to FROMM BROS., NIEMAN & CO., a corporation, grantee, of Ozaukee County, Wisconsin, for the sum of One Dollar (\$1.00) and other valuable consideration, an undivided one-half interest in and to the following tracts of land in Ozaukee County, Wisconsin:

Commencing at a point, which point is the south east corner of the West Half of the Southeast Quarter (W $\frac{1}{2}$ SE $\frac{1}{4}$) of Section Ten (10), Township Nine (9) North, of Range Twenty-one (21) East, and running from there west along the section line two and fifteen hundredths (2.15) chains to the east line of the Milwaukee-Cedarburg Plank Road; thence along the east line of said Milwaukee-Cedarburg Plank Road North, seventeen and one-half degrees (17 $\frac{1}{2}$ ^o) west seven (7) chains; thence north twenty-six degrees (26) west eighteen and twenty-eight hundredths (18.28) chains to the east line of a strip of land formerly a part of the Milwaukee Northern Railway Company's right of way, but now owned by the town of Mequon, and described in that certain deed made and acknowledged April 30, 1917, and recorded in the office of the Register of Deeds, June 12, 1917, at 4 o'clock P.M., in Volume 63 of Deeds, pages 346-347; thence along the east line of said strip of land north, three and one-half degrees (3 $\frac{1}{2}$ ^o) west sixteen and ninety-six hundredths (16.96) chains to the east and west quarter section line of said Section Ten (10); thence east along said quarter section line twelve and seventy-six hundredths (12.76) chains to the west line of the East Half of the Southeast Quarter (E $\frac{1}{2}$ SE $\frac{1}{4}$) of said Section Ten (10); thence south along said line forty and fourteen hundredths (40.14) chains to the place of beginning, containing thirty-six and twenty hundredths (36.20) acres of land, more or less; also

Commencing at a point, which point is the southeast corner of the Southwest Quarter of the Northeast Quarter (SW $\frac{1}{4}$ NE $\frac{1}{4}$) of Section Ten (10), Township Nine (9) North, Range Twenty-one (21) East, and running from there west twelve and fifty-three hundredths (12.53) chains along the east and west quarter section line of said Section Ten (10) to the east line of the Milwaukee-Cedarburg Plank Road; thence along the east line of said Milwaukee-Cedarburg Plank Road north eighteen degrees (18^o) East ten and forty-six hundredths (10.46) chains; thence north eleven and three quarters degrees (11-3/4^o) east, ten and ten hundredths (10.10) chains to the south line of the North Half of the Northeast Quarter (N $\frac{1}{2}$ NE $\frac{1}{4}$) of said Section Ten (10); thence east along said line seven (7) chains to the west line of the East Half of the Northeast Quarter (E $\frac{1}{2}$ NE $\frac{1}{4}$) of said Section Ten (10); thence south along said line twenty (20) chains to the place of beginning, and containing eighteen and ninety-nine hundredths (18.99) acres of land, more or less; also

The Northeast Quarter of the Southeast Quarter (NE $\frac{1}{4}$ SE $\frac{1}{4}$) of Section Ten (10), and the Northwest Quarter of the Southwest Quarter (NW $\frac{1}{4}$ SW $\frac{1}{4}$) of Section Eleven (11), excepting therefrom one and seventy-seven hundredths (1.77) acres in the northeast corner of said Northwest Quarter (NW $\frac{1}{4}$), all in Township Nine (9) North, of Range Twenty-one (21) East, containing seventy-eight and twenty three hundredths (78.23) acres of land, more or less; also

The southeast Quarter of the Northeast Quarter (SE $\frac{1}{4}$ NE $\frac{1}{4}$) of Section Ten (10), Township Nine (9) North, of Range Twenty-one (21) East; also

The Southwest Quarter of the Northwest Quarter (SW $\frac{1}{4}$ NW $\frac{1}{4}$) of Section Eleven (11), Township Nine (9) North, of Range Twenty-one (21) East, excepting therefrom, however, one-half acre on the east side of the Green Bay Road heretofore conveyed to Diedrich Wurthmann, containing thirty-nine and one-half (39 $\frac{1}{2}$) acres of land; also

So much of the south twenty (20) acres of the East Half of the Northwest Quarter (E $\frac{1}{2}$ NW $\frac{1}{4}$) of Section Eleven (11), Township Nine (9) North, of Range Twenty-one (21) East, as is situated on the west side of the Green Bay Road, and containing about one-fourth ($\frac{1}{4}$) acre; also

The North Half of the East Half of the Southwest Quarter (N $\frac{1}{2}$ E $\frac{1}{2}$ SW $\frac{1}{4}$) of Section Eleven (11) Township Nine (9) North, of Range Twenty-one (21) East, containing forty (40) acres, more or less; also

A piece of land beginning at the center of the Green Bay Road on the north line of the North west Quarter of the Southwest Quarter (NW $\frac{1}{4}$ SW $\frac{1}{4}$) of Section Eleven (11) aforesaid, and two and forty-seven hundredths (2.47) chains west of the northeast corner of said Northwest Quarter of the Southwest Quarter (NW $\frac{1}{4}$ SW $\frac{1}{4}$) of Section Eleven (11) aforesaid; running thence east two and forty-seven hundredths (2.47) chains; thence south five and four hundredths (5.04) chains; thence west four and fifty-eight hundredths (4.58) chains to the center of the Green Bay Road; thence northerly along the center of said Green Bay Road five and fifty-six hundredths (5.56) chains to the place of beginning, containing one and three fourths (1 $\frac{3}{4}$) acres of land; also

The North Half of the Southeast Quarter of the Northwest Quarter (N $\frac{1}{2}$ SE $\frac{1}{4}$ NW $\frac{1}{4}$) and the south ten (10) acres of the Northeast Quarter of the Northwest Quarter (NE $\frac{1}{4}$ NW $\frac{1}{4}$), all of Section Eleven (11), Township Nine (9) North, Range Twenty-one (21) East, containing thirty (30) acres of land, more or less.

IN WITNESS WHEREOF, the said grantor has caused these presents to be signed by EDWARD FROMM, its President, and countersigned by JOHN FROMM, its Secretary, at HAMBURG, Wisconsin, and its corporate seal to be hereunto affixed, this 1st day of June, A.D. 1929.

Signed and Sealed in Presence of:

W.J. GRUETT (?)
W.A. KOHLHOFF

(Corporate Seal)

FROMM BROS., INC.
By EDWARD FROMM

President

Countersigned:

JOHN FROMM

Secretary

STATE OF WISCONSIN)
MARATHON COUNTY) ss.

Personally came before me this 1st day of June, A.D. 1929, EDWARD FROMM, President, and JOHN FROMM, Secretary of the above named corporation, to me known to be the persons who executed the foregoing instrument, and to me known to be such President and Secretary of said corporation, and acknowledged that they executed the foregoing instrument as such officers as the deed of said corporation, by its authority.

(Notarial Seal)

CHARLES F. SMITH
Notary Public, Marathon County, Wis.
My commission expires Sept. 15th, 1929.

Recorded Dec. 13, 1929
at 1:10 o'clock P.M.
Wm. Ahlhauser, Register
Ada M. Ahlhauser, Deputy.

EDWIN J. NIEMAN AND OTHERS)
TO) NO. 99960 QUIT CLAIM DEED
FROMM BROS., NIEMAN & CO.,)
a corporation

THIS INDENTURE, Made by EDWIN J. NIEMAN and ERNA A. NIEMAN, of Ozaukee County, Wisconsin, EDWARD FROMM and ALICE FROMM, his wife, HENRY FROMM and MAMIE FROMM, his wife, WALTER FROMM and MABEL FROMM, his wife, and JOHN FROMM, single, of Marathon County, Wisconsin, constituting the copartnership known as FROMM BROS., NIEMAN & CO., the aforesaid being all of the copartners thereof, grantors, hereby QUITCLAIM to FROMM BROS., NIEMAN & CO., a corporation, grantees, of Ozaukee County, Wisconsin, for the sum of One Dollar (\$1.00) and other valuable consideration, the following tract of land in Ozaukee County, State of Wisconsin:

All that part of the North Half of the Northeast Quarter (N $\frac{1}{2}$ NE $\frac{1}{4}$) of Section Ten (10), Township Nine (9) North, Range Twenty-one (21) East, which lies east of the present right of way of the Chicago, Milwaukee & St. Paul & Pacific Railway Co.

IN WITNESS WHEREOF, the said grantors have hereunto set their hands and seals this 19th day of October, A.D. 1929.

Signed and Sealed in presence of:

THEO. F. WITTENBERG
W.J. GRUETT (?)

EDWIN J. NIEMAN (SEAL)
ERNA A. NIEMAN (SEAL)
EDWARD FROMM (SEAL)
ALICE FROMM (SEAL)
HENRY FROMM (SEAL)
MAMIE FROMM (SEAL)
WALTER FROMM (SEAL)

F.1 - Property Legal Description

That part of the South 1/2 of the Northeast 1/4 of the North 1/2 of the Southeast 1/4 of Section 10, Town 9 North, Range 21 East, in the City of Mequon, Ozaukee County, Wisconsin, bounded and described as follows:

Commencing at the Northeast corner of said Southeast 1/4 Section; thence S 0° 58' 00" E, along the East line of said 1/4 Section 422.40 feet, to a point in the centerline of a private road; thence N 89° 47' 00" W, along said centerline 779.00 feet, to the point of beginning of lands to be described; thence S 0° 58' 00" E, 45.00 feet; thence N 89° 47' 00" W 111.06 feet; thence S 0° 58' 00" E, 194.05; thence Westerly, 437.20 feet; thence N 1° 08' 45" W, 170.34; thence West, 69.55 feet; thence N 2° 07' 00" W, 724.44 feet; thence East 533.00 feet, to a point of curvature; thence 158.03 feet along the arc of a curve to the right (having a radius of 101.70 feet, a chord distance of 142.62 feet, which bears S 45° 29' 00" E), to a point of tangency; thence S 0° 58' 00" E, 554.62 feet to the point of beginning, said lands containing 11.992 acres of land more or less.

BUT EXCEPTING THEREFROM that part conveyed in Warranty Deed from Fromm Bros., Nieman & Co. to Michael Malicki, dated September of 1985 and recorded on October 3, 1985, in Volume 537 of Deeds, starting on Page 411, as Document No. 364271.

AND EXCEPTING THEREFROM ALSO that part conveyed in warranty deed from Fromm Bros., Nieman & Company to Edwin J. Nieman and Erna A. Nieman, his wife, dated —, 1947, and recorded in December of 1949, in Volume 109 of Deeds, on Pages 207-208, or Page 209 as Document No. 141683 or 141684.

(For reference purposes only: Tax Key No. 14-010-03-005.00)

Source: Ozaukee County Interactive Mapping Website
(<https://ozaukee.co.ag.s.ruekert-mielke.com/>)

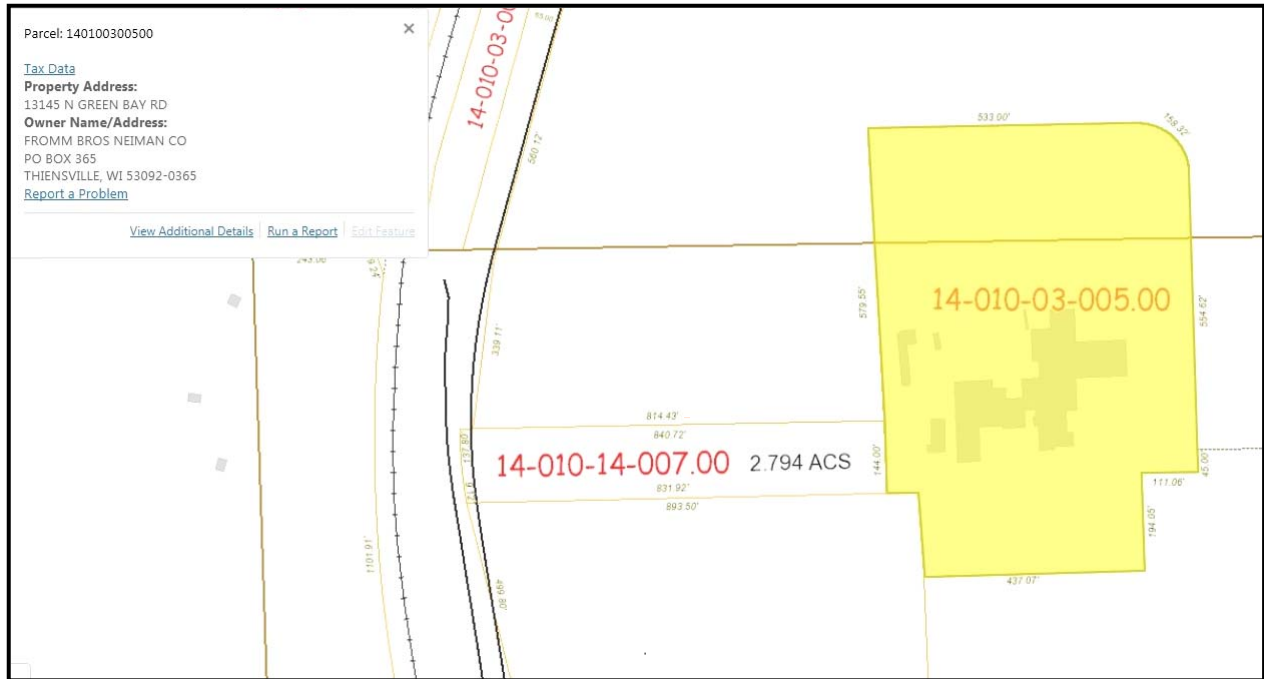


FIGURE F.2
Map of Properties
1033 N. Mayfair Road and
10930 W. Potter Road
Wauwatosa, Wisconsin
Project No. 1E-1605014



GILES
ENGINEERING ASSOCIATES, INC.

Source: City of Mequon Zoning Website
(http://www.ci.mequon.wi.us/index.asp?Type=B_BASIC&SEC=%7B25962BDA-0B2D-4304-9AF1-F480EB83E7CE%7D)

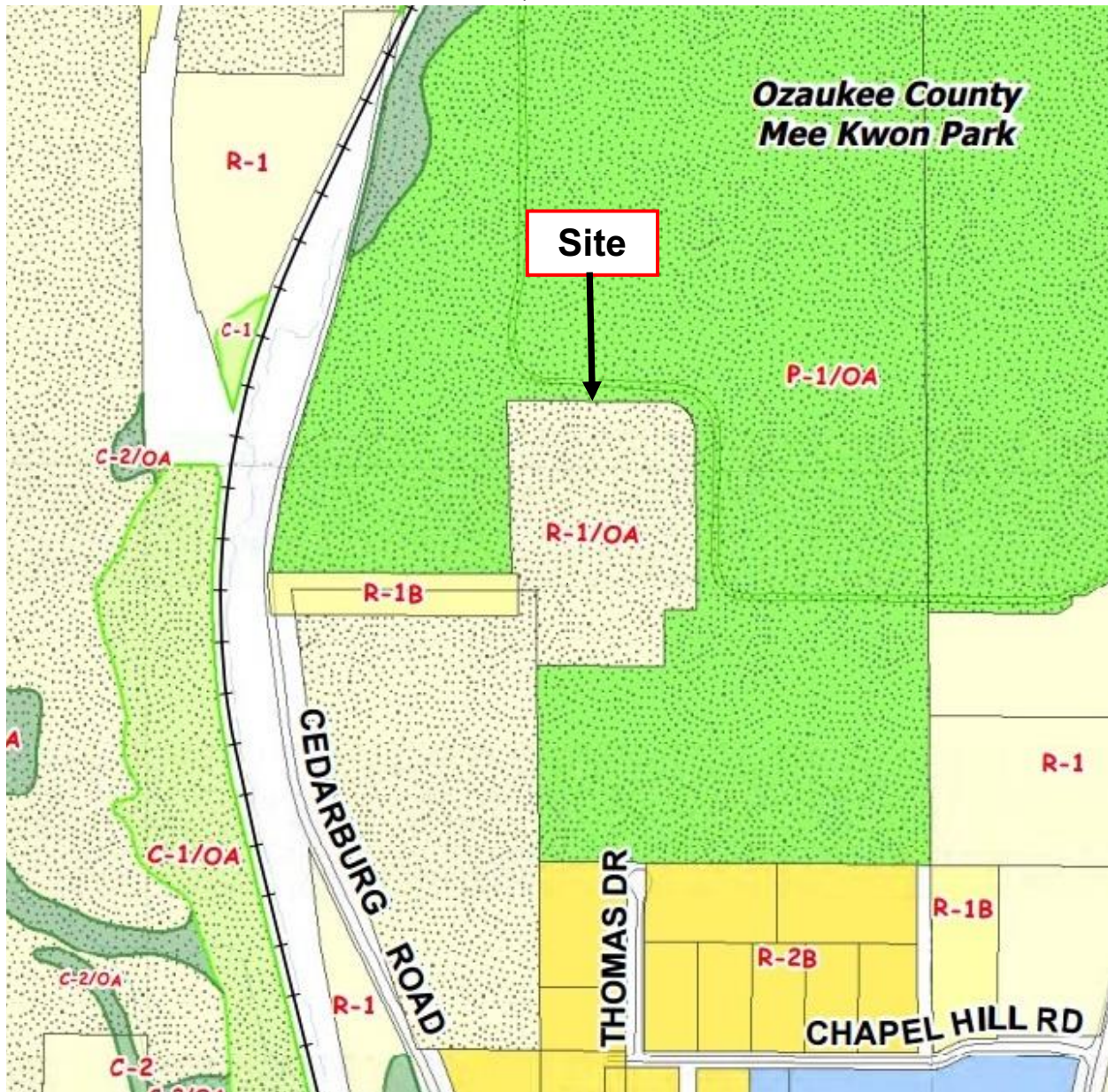


FIGURE F.3 City of Mequon Zoning Map

Fromm Bros. Nieman & Co
13145 Green Bay Road
Mequon, Wisconsin
BRRTS #02-46-000875
Project No. 1E-1605014



GILES
ENGINEERING ASSOCIATES, INC.

SIGNED STATEMENT OF ACCURACY OF PARCEL LEGAL DESCRIPTION (Attachment F)

Fromm Bros. Nieman CO, as the party responsible for the impacts originating at 13145 Green Bay Road in Mequon, Ozaukee County, Wisconsin (BRRTS #02-46-000875), believes that the current legal description has been attached for the property that is within the contaminated site boundary. That legal description is:

Legal Description

That part of the South 1/2 of the Northeast 1/4 of the North 1/2 of the Southeast 1/4 of Section 10, Town 9 North, Range 21 East, in the City of Mequon, Ozaukee County, Wisconsin, bounded and described as follows:

Commencing at the Northeast corner of said Southeast 1/4 Section; thence S 0° 58' 00" E, along the East line of said 1/4 Section 422.40 feet, to a point in the centerline of a private road; thence N 89° 47' 00" W, along said centerline 779.00 feet, to the point of beginning of lands to be described; thence S 0° 58' 00" E, 45.00 feet; thence N 89° 47' 00" W 111.06 feet; thence S 0° 58' 00" E, 194.05; thence Westerly, 437.20 feet; thence N 1° 08' 45" W, 170.34; thence West, 69.55 feet; thence N 2° 07' 00" W, 724.44 feet; thence East 533.00 feet, to a point of curvature; thence 158.03 feet along the arc of a curve to the right (having a radius of 101.70 feet, a chord distance of 142.62 feet, which bears S 45° 29' 00" E), to a point of tangency; thence S 0° 58' 00" E, 554.62 feet to the point of beginning, said lands containing 11.992 acres of land more or less.

BUT EXCEPTING THEREFROM that part conveyed in Warranty Deed from Fromm Bros., Nieman & Co. to Michael Malicki, dated September of 1985 and recorded on October 3, 1985, in Volume 537 of Deeds, starting on Page 411, as Document No. 364271.

AND EXCEPTING THEREFROM ALSO that part conveyed in warranty deed from Fromm Bros., Nieman & Company to Edwin J. Nieman and Erna A. Nieman, his wife, dated — —, 1947, and recorded in December of 1949, in Volume 109 of Deeds, on Pages 207-208, or Page 209 as Document No. 141683 or 141684.

(For reference purposes only: Tax Key No. 14-010-03-005.00)

The undersigned deems the above legal description to be true and accurate.

By: Thomas E. Nieman

Printed Name: Thomas E. Nieman

Title: President

Date: 5/25/2016

02-46-000875
BRRTS #

Fromm Family Foods, Inc., Mequon, Wisconsin
Activity (Site) Name

Attachment G: Notifications

Due to the assumed low K of the glacial till that underlies the Site, it is assumed that impacted groundwater has not migrated from the Site.