

State of Wisconsin
Department of Natural Resources
PO Box 7921, Madison WI 53707-7921
dnr.wi.gov

Case Closure

Form 4400-202 (R 10/22)

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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 Public 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. 02-60-001045	VPLE No.		
Parcel ID No. 59281312560			
FID No. 460041560	WTM Coordinates		
	X 704151	Y 363287	
BRRTS Activity (Site) Name VPI Corporation Property	WTM Coordinates Represent: <input type="checkbox"/> Source Area <input type="checkbox"/> Parcel Center		
Site Address 3123 South 9th Street	City Sheboygan	State WI	ZIP Code 53082
Acres Ready For Use	10.3		

Responsible Party (RP) Name

Jeff Udovich

Company Name

VPI Corporation

Mailing Address 3123 South 9th Street	City Sheboygan	State WI	ZIP Code 53082
Phone Number (920) 451-5814	Email jjudovich@vpicorp.com		

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

Environmental Consultant Name

Rick Frieske

Consulting Firm

Friess Environmental Consulting Inc

Mailing Address 6635 N Sidney Pl	City Milwaukee	State WI	ZIP Code 53209
Phone Number (414) 228-9815	Email rfrieske@fecinc.us		

Fees and Mailing of Closure Request

1. **Send a copy of page one** of this form and the applicable ch. NR 749, Wis. Adm. Code, fee(s) to the DNR Regional EPA (Environmental Program Associate) at <http://dnr.wi.gov/topic/Brownfields/Contact.html#tabx3>. Please see RR-997 Implementation of Wis. Admin. Code chs. NR 749 and NR 750 Fees (<https://dnr.wi.gov/DocLink/RR/RR997.pdf>) for additional information on what fees apply. Check all fees that apply:

☒ \$1,050 Closure Fee

☐ \$300 Database Fee for Soil, performance standard such as a cover, Structural impediment, or Industrial Soil Standard

☐ \$350 Database Fee for Groundwater, Monitoring Wells (Not Abandoned), Vapor (7A-7E), Sediment, or Site-Specific Continuing Obligations (NR 749 Table 1 (d) 1, 3 and 4)

Total Amount of Payment \$ \$1,050.00

☐ Resubmittal, Fees Previously Paid

2. **Submit a complete electronic copy of the entire closure package via the RR Submittal Portal** (<https://dnr.wisconsin.gov/topic/Brownfields/Submittal.html>) to the Regional Project Manager assigned to your site. Any subsequent revisions should also be sent via the RR Submittal Portal. For additional submittal instructions, please review RR-960 Guidance for Submitting Documents (<https://dnr.wi.gov/DocLink/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 the northeast corner of South 9th Street and Washington Avenue and listed as 3123 South 9th Street, Sheboygan, Sheboygan County, Wisconsin. The property is an approximately 10.28-acre parcel improved with an approximately 110,000-square-foot manufacturing facility. Additional improvements include four product storage silos, a scale house, and a tank building located on the south side of the site and a wood frame storage building located on the east side of the property. The site is predominately occupied by the manufacturing facility and associated parking areas. The easternmost portion of the site includes an elongated portion that extends north to Wilson Avenue that is an apparent drainage ditch. The property is bordered by commercial/industrial property to the north, Washington Avenue and vacant wooded land to the south, commercial/industrial property to the east, and South 9th Street and residential properties to the west.
- B. **Prior and current site usage:** Specifically describe the current and historic occupancy and types of use.
The site was historically vacant agricultural land since before 1937 until the construction of a manufacturing facility by Great Lakes, Inc., a home building company, in 1960, with several expansions through 1963. The facility has been occupied by Vinyl Products, Inc. (VPI) since approximately 1966. VPI manufactures vinyl floor tile and associated flooring products. Products generally include various size pre-cut floor tiles, roll flooring, and base cove.
- C. **Current zoning** (e.g., industrial, commercial, residential) for the site and for neighboring properties, and how verified (Provide documentation in Attachment G).
UI - Urban Industrial - per City of Sheboygan.
- D. **Describe how and when site contamination was discovered.**
Terracon conducted a Phase I ESA in August 2019. The site was identified as a closed ERP case on the Wisconsin Department of Natural Resources' (WDNR's) Remediation and Redevelopment Sites database. The closed ERP case is related to a 1974 release of approximately 7,300-gallons of plasticizer containing bis(2-ethyl-hexyl) phthalate (a.k.a. di-2-ethylhexyl phthalate, diethylhexyl phthalate, DEHP, dioctyl phthalate, DOP) that was noted in the Phase I ESA. Investigation was performed between 1994 and 1996 that included soil and groundwater sampling. The area of investigation was generally confined to the southwest corner of the property between South 9th Street and the bulk plasticizer storage building where the spill was reported to have occurred. The soil samples were analyzed for DEHP, other phthalates, and volatile organic compounds (VOCs). It was determined that the DEHP contamination did not extend to depth and had not migrated beyond the initial release location. The ERP case was closed by the WDNR on June 24, 1997, with no further action required. Terracon noted an historic DEHP concentration of 360 mg/kg, which was identified at a depth of 6-8 feet below grade in 1995. The current non-industrial direct contact RCL for soil is 38.8 mg/kg. While the WDNR typically considers direct contact RCLs applicable for soil in the upper 4 feet, shallower samples were not collected at this location.
- E. **Describe the type(s) and source(s) or suspected source(s) of contamination.**
In January and February 2020, Terracon conducted a Limited Site Investigation (LSI) consisting of collecting soil and groundwater samples from twelve probes and temporary wells to investigate the potential for subsurface impacts related to the on- and off-site RECs and the CREC identified in the Phase I ESA.

Concentrations of DEHP were detected in the shallow soil samples collected from soil borings P-1, P-9, P-10, and P-12 exceeding their non-industrial and industrial direct contact and soil to groundwater pathway RCLs.

DEHP was detected in the groundwater samples collected from MW-1 and temporary wells P-9, P-10, P-11, and P-12 at concentrations above its NR 140 enforcement standard (ES). The DEHP was previously investigated and remediated to the extent required by WDNR. It is believed that the additional data is likely associated with residual impacts from the 1974 spill, which was closed by the DNR in 1997. Use of DEHP at the site was discontinued around 1988.

The presence of low-level VOCs were also detected in the groundwater, including concentrations of cis-1,2-dichloroethene above its NR 140 preventive action limit (PAL) and vinyl chloride above its NR 140 ES. Terracon contacted the DNR to discuss how to present the additional data from the historic spill that had been closed by the DNR and subsequently reported the low-level detections of vinyl chloride and cis-1,2-dichloroethene to the DNR. In its letter dated February 19, 2020, the DNR re-opened the site and issued a responsible party letter requiring additional investigation and subsequent site closure.
- 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.**
02-60-001045 VPI Corp Property Re-opened ERP

- H. List BRRTS activity/site name(s) and number(s) for all properties immediately adjacent to (abutting) this source property.
None

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.
Subsurface soils at the property generally consist of a layer of gravel and sand fill material overlaying a variable silty sand fill layer from 1 to 4 feet bgs, and silty-clays to 13 feet bgs.
- ii. Describe the composition, location and lateral extent, and depth of fill or waste deposits on the site.
Approximately one foot of sand and gravel fill material associated with the gravel parking area covers the area and overlies approximately 1 to 4 feet of variable silty sand fill material. No waste deposits were noted on the site.
- iii. Describe the depth to bedrock, bedrock type, competency and whether or not it was encountered during the investigation.
Dolomite bedrock is anticipated to be at depths greater than 50 feet and was not encountered to a depth of at least 20 feet bgs.
- 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 is mostly covered with the existing slab-on-grade building or asphalt parking areas. The southern portion is a gravel covered parking area and landscaped grassy areas exist around the perimeter of the buildings. A drainage ditch runs along the eastern portion of the property flowing from north to south and connected to the municipal storm sewer system.

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 depths to groundwater ranged from 0.95 to 6.70 feet bgs. Free product was noted in MW-11 during the initial groundwater monitoring. Groundwater is likely perched within the granular fill soils present on the site.
- ii. Discuss groundwater flow direction(s), shallow and deep. Describe and explain flow variations, including fracture flow if present.
In general, the results of the groundwater elevation survey indicate groundwater flows in a east-southeasterly direction.
- iii. Discuss groundwater flow characteristics: hydraulic conductivity, flow rate and permeability, or state why this information was not obtained.
Based on the presence of fill soils in the area and variable soil permeabilities present, groundwater flow rate would be highly variable. Groundwater is likely perched in the granular fill soils. The silty clays present at depth would indicate lower permeabilities.
- 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).
No potable wells within 1,200 feet.

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.

In January and February 2020, Terracon conducted a Limited Site Investigation (LSI) consisting of collecting soil and groundwater samples from twelve probes (P-1 to P-12) and temporary wells to investigate the potential for subsurface impacts.

In March 2020, FEC was retained to define the extent of the impacts on-site and further delineate the soil and groundwater contamination in the area of the original release. FEC documented the procedures utilized by Giles Engineering Associates, Inc. (Giles) to advance four soil probes and one hand auger (P-13 to P-17) to a maximum depth of approximately 13 feet below ground surface (bgs). In addition, six groundwater monitoring wells (MW-2 to MW-6) were installed and subsequently sampled. The results were presented to the DNR in a Site Investigation report dated June 2020. The DNR reviewed the results and requested additional site investigation and groundwater monitoring.

In October 2020 and May 2021, FEC documented the procedures utilized by Giles to advance thirteen additional soil probes (P-18 to P-30) to a maximum depth of approximately 13 feet below ground surface (bgs). In addition, eight additional groundwater monitoring wells (MW-7 to MW-14) were installed and subsequently sampled. Groundwater monitoring rounds were also conducted in October 2020 and February, May, and August 2021. During this subsequent

sampling (P-25 and P-26) it appears that the original samples from P-10 and P-11 were accidentally switched and the area of P-11/P-25 was found to be the area of highest soil and groundwater concentration (free product).

FEC submitted a Remedial Action Plan to the DNR for review in September 2021. The DNR approved the RAP in their letter dated March 25, 2022, with the recommendation for storm sewer assessment, limited source removal, and continued groundwater monitoring before and after completion of the remedial activities.

As requested, an assessment of the storm sewer lateral involved in the original 1974 discharge was conducted to complete the site investigation. During site grading work conducted for the loading docks in the late 1990's the former storm sewer catch basin was removed and the lateral abandoned. The site was subsequently regraded to a new storm sewer catch basin (and lift station) located northwest of the former catch basin in the upgraded loading dock area. No soils were reportedly excavated from around the former catch basin and this area was not found to contain any residual impacts (GP-1 to GP-7 and GP-10) during the investigation conducted in 1995 (original ERP case). As such, the former sewer lateral does not appear to be a conduit for contaminant migration.

As part of the implementation of the RAP, groundwater monitoring was conducted, a hot spot source removal was completed, and capping of the area of residual impacts to mitigate the risks to groundwater and from direct contact at the site was completed.

- 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.

Concentrations of DEHP were only detected in the shallow soil samples collected from soil borings GP-9, GP-18, P-1, P-9, P-10 (P-11), P-12, P-25, and P-27 exceeding their non-industrial and industrial direct contact and/or soil to groundwater pathway RCLs and define the soil impacts to the site. Soil samples collected from soil borings GP-9, GP-18, P-1, P-9, P-10 (P-11), P-12, P-25, and P-27 at deeper intervals (6 feet bgs) generally did not contain any concentrations of DEHP exceeding its non-industrial and industrial direct contact or soil to groundwater pathway RCLs. As such, the vertical extent of the impacts appears to have been defined.

DEHP remains at concentrations above its NR 140 enforcement standard (ES) in the groundwater samples collected from MW-11, MW-12, and MW-13. DEHP remains at concentrations above its NR 140 preventive action limit (PAL) in the groundwater samples collected from MW-1, MW-4, MW-5, and MW-9. Consequently, the results of the testing indicate that the groundwater impacts are defined on site.

Terracon conducted a vapor intrusion evaluation consisting of two sub-slab vapor points installed in the buildings to collect sub-slab vapor samples for VOCs. VOCs were detected at concentrations above the level of detection (LOD) in samples collected from both sub-slab vapor monitoring points; however, the detected concentrations were below applicable residential and commercial vapor risk screening levels (VRSLs). FEC also conducted additional vapor intrusion evaluation consisting of sampling two sub-slab vapor points (VP-1 and VP-2) installed in the south end of the main building and in the plasticizer building to collect sub-slab vapor samples for VOCs and DEHP. VOCs were detected at concentrations above the level of detection (LOD) in samples collected from both sub-slab vapor monitoring points; however, the detected concentrations were below applicable residential and commercial vapor risk screening levels (VRSLs). In addition, DEHP was not detected at concentrations above the level of detection (LOD) in samples collected from both sub-slab vapor monitoring points. As such, no vapor intrusion risk is present at the Site.

A surface water sample from the drainage swale that runs along the eastern portion of the property flowing from north to south and connected to the municipal storm sewer system was requested in the DNR's Remedial Action Documentation Report Review letter dated March 23, 2023. As such, FEC collected a surface water sample from the swale near MW-5 (near the leading edge of the plume) and analyzed it for DEHP. No concentration of DEHP was detected in the surface water sample. As such, no sediment sampling was required.

- 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.

The building and concrete pavement present would serve to inhibit precipitation infiltration for the protection of the groundwater pathway and act as a direct contact barrier. The gravel would also serve to inhibit direct contact.

B. Soil

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

Concentrations of DEHP were detected in the shallow soil samples collected from soil borings GP-9, GP-18, P-1, P-9, P-10 (P-11), P-12, P-25, and P-27 exceeding their non-industrial and industrial direct contact and/or soil to groundwater pathway RCLs. Soil samples collected from soil borings GP-9, GP-18, P-1, P-9, P-10 (P-11), P-12, P-25, and P-27 at deeper intervals (6 feet bgs) generally did not contain any concentrations of DEHP exceeding its non-industrial and industrial direct contact or soil to groundwater pathway RCLs. As such, the vertical extent of the impacts appears to have been defined. The results of the soil analytical from the other borings did not indicate concentrations of VOCs or SVOCs detected above the DNR's soil RCLs for the protection of groundwater or direct contact and define the soil

impacts to the site. It is believed that the impacts are likely associated with residual impacts from the 1974 spill, which was closed by the DNR in 1997. Use of DEHP at the site was discontinued around 1988.

- ii. Describe the concentration(s) and types of soil contaminants found in the upper four feet of the soil column. Concentrations of DEHP were detected in the shallow soil samples collected from soil borings GP-9, P-1, P-9, P-10 (P-11), P-12, P-25, and P-27 exceeding their non-industrial and industrial direct contact and soil to groundwater pathway RCLs.
- 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.

The Residual Contaminant Levels (RCLs) were established in accordance with s. NR 720.10 that is protective of groundwater quality and in accordance with s. NR 720.12 that is protective of human health from direct contact with contaminated soil in a non-industrial setting. RCLs are the same as those contained in the Department's RCL Spreadsheets.

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.

DEHP was detected and remains at concentrations above its NR 140 enforcement standard (ES) in the groundwater samples collected from MW-11, MW-12, and MW-13. DEHP concentrations originally detected above its NR 140 ES in the groundwater samples collected from MW-1, MW-4, MW-5, and MW-9 have shown contaminant reductions; however, remain above their NR 140 preventive action limit (PAL). Concentrations of DEHP originally detected above its NR 140 PAL in the groundwater samples collected from MW-6, MW-7, MW-8, and MW-14 are currently non-detect at those locations. No concentrations of DEHP were detected from MW-2 or MW-3.

In addition, vinyl chloride was detected at MW-1, MW-12, and P-9 at concentrations above its NR 140 ES. This was further defined by P-3 through P-8 and MW-2, MW-3, MW-4, MW-5, MW-7, MW-8, MW-9, and MW-10, which were all no detect for vinyl chloride.

As such, the results of the groundwater analytical testing indicate that the groundwater impacts are defined on site. It is believed that these impacts are likely associated with residual impacts from the 1974 spill, which was closed by the DNR in 1997. Use of DEHP at the site was discontinued around 1988.

- 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.
- P-25/MW-11 was installed near P-11, which was the area of confirmed DEHP free product. P-18, P-19, P-20, and P-21/MW-8 were advanced around P-25/MW-11 to better define the area of free product and groundwater impacts. Approximately 8-inches of free product was present in MW-11 in late 2020. No indication of free product was observed at P-18, P-19, P-20, or P-21/MW-8. Approximately 3 gallons of free product were removed from MW-11 to allow for the sampling of groundwater at MW-11 during the October 2020 groundwater sampling event. Less than 1/2-inch of free product was present in MW-11 during the February 2021 groundwater sampling event. No free product removal was necessary to obtain a groundwater sample from MW-11 during subsequent groundwater sampling events. The area of P-25/MW-11 was excavated and removed during the remedial actions described below.

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.
- Terracon conducted a vapor intrusion evaluation consisting of two sub-slab vapor points installed in the buildings to collect sub-slab vapor samples for VOCs. VOCs were detected at concentrations above the level of detection (LOD) in samples collected from both sub-slab vapor monitoring points; however, the detected concentrations were below applicable residential and commercial vapor risk screening levels (VRSLs).

FEC also conducted additional vapor intrusion evaluation consisting of sampling two sub-slab vapor points (VP-1 and VP-2) installed in the south end of the main building and in the plasticizer building to collect sub-slab vapor samples for VOCs and DEHP. VOCs were detected at concentrations above the level of detection (LOD) in samples collected from both sub-slab vapor monitoring points; however, the detected concentrations were below applicable residential and commercial vapor risk screening levels (VRSLs). In addition, DEHP was not detected at concentrations above the level of detection (LOD) in samples collected from both sub-slab vapor monitoring points. As such, no vapor intrusion risk is present at the Site.

- 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).
- No action levels were exceeded.

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.

A surface water sample from the drainage swale that runs along the eastern portion of the property flowing from north to south and connected to the municipal storm sewer system was requested in the DNR's Remedial Action Documentation Report Review letter dated March 23, 2023. As such, FEC collected a surface water sample from the swale near MW-5 (near the leading edge of the plume) and analyzed it for DEHP. No concentration of DEHP was detected in the surface water sample. As such, no sediment sampling was required.

- 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. No surface water exceedances present at the site and no sediment sampling required.

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.

In approximately 1989, VPI renovated the south lot of their facility for addition of a concrete slab and various grading activities allowing for better truck traffic access. Excavation activities identified DEHP-impacted soils onsite, and the material was stockpiled and ultimately received approval for landfilling. Reportedly, approximately 135 tons of DEHP-impacted soil was landfilled.

A hot spot source removal excavation was completed on June 9, 2022, in the area of MW-11 and MW-8, to remove the highest levels of shallow impacts from the Site. A total of approximately 40 tons of soil was excavated and loaded into three rollbox containers for shipment and disposal by Waste Management at their facility in Arlington, OR. The area of excavation encompassed an area approximately 40 feet by 10 feet and extended to a depth of approximately 4 feet. The area of excavation was determined based on the results of the SI and no post excavation confirmation samples were collected.

After excavation activities the remaining area to be capped was then graded for asphalt installation. The regrading activities included removal of the former railroad spur to allow for the asphalt cap to be placed between the plasticizer building and main building to the north. Any excess material from the grading operations was placed into the prior hot spot excavation as fill and subsequently covered with stone. The asphalt cap was subsequently placed over the remaining impacts (including the former excavation area) on June 18, 2022.

The remedial excavation and installation of the asphalt cap will mitigate potential direct contact risks and eliminate future water infiltration through the residual soil impacts and risk to groundwater quality. These actions were documented in the Remedial Action Documentation Report dated December 23, 2022.

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

No immediate or interim actions conducted.

- 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.

A hot spot source removal excavation was completed on June 9, 2022, in the area of MW-11 and MW-8, to remove the highest levels of shallow impacts from the Site. A total of approximately 40 tons of soil was excavated and loaded into three rollbox containers for shipment and disposal by Waste Management. The area of excavation encompassed an area approximately 40 feet by 10 feet and extended to a depth of approximately 4 feet.

After excavation activities the remaining area to be capped was then graded for asphalt installation. The regrading activities included removal of the former railroad spur to allow for the asphalt cap to be placed between the plasticizer building and main building to the north. Any excess material from the grading operations was placed into the prior hot spot excavation as fill and subsequently covered with stone. The asphalt cap was subsequently placed over the remaining impacts (including the former excavation area) on June 18, 2022.

- 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.

A Green and Sustainable Remediation was evaluated; however, was deemed not applicable to the site.

- 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.

Concentrations of DEHP were detected in the shallow soil samples collected from soil borings GP-9, GP-18, P-1, P-9, P-10 (P-11), P-12, P-25, and P-27 exceeding their non-industrial and industrial direct contact and soil to groundwater pathway RCLs. These impacts do not extend beyond ten feet bgs and are currently capped.

DEHP remains at concentrations above its NR 140 enforcement standard (ES) in the groundwater samples collected from MW-11, MW-12, and MW-13. DEHP remains at concentrations above its NR 140 preventive action limit (PAL) in the groundwater samples collected from MW-1, MW-4, MW-5, and MW-9.

- 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.

Concentrations of DEHP were detected in the shallow soil samples collected from soil borings GP-9, P-1, P-9, P-10 (P-11), P-12, P-25, and P-27 exceeding its non-industrial and industrial direct contact RCLs.

- 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.

Concentrations of DEHP were detected in the soil samples collected from above the water table at soil borings P-1, P-9, P-10 (P-11), P-12, P-25, and P-27 exceeding its soil to groundwater pathway RCLs.

- 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.

Concentrations of DEHP were detected in the shallow soil samples collected from soil borings GP-9, GP-18, P-1, P-9, P-10 (P-11), P-12, P-25, and P-27 exceeding their non-industrial and industrial direct contact and soil to groundwater pathway RCLs. These impacts do not extend beyond ten feet bgs. The area of residual impacts (with the exception of GP-18) was capped with asphalt to mitigate potential direct contact risks and eliminate future water infiltration through the residual soil impacts and risk to groundwater quality. The remaining impacts on site will be addressed through the implementation of a Cap Maintenance Plan (CMP).

DEHP remains at concentrations above its NR 140 enforcement standard (ES) in the groundwater samples collected from MW-11, MW-12, and MW-13. DEHP remains at concentrations above its NR 140 preventive action limit (PAL) in the groundwater samples collected from MW-1, MW-4, MW-5, and MW-9. In addition, vinyl chloride was detected at MW-1, MW-12, and P-9 at concentrations above its NR 140 ES. The groundwater results indicate the groundwater impacts are defined and limited to the site, have shown decreasing trends, and are able to be controlled using natural attenuation.

- 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).

DEHP was detected and remains at concentrations above its NR 140 enforcement standard (ES) in the groundwater samples collected from MW-11, MW-12, and MW-13. DEHP concentrations originally detected above its NR 140 ES in the groundwater samples collected from MW-1, MW-4, MW-5, and MW-9 have shown contaminant reductions; however, remain above its NR 140 preventive action limit (PAL). Concentrations of DEHP originally detected above its NR 140 PAL in the groundwater samples collected from MW-6, MW-7, MW-8, and MW-14 are currently non-detect. No concentrations of DEHP were detected from MW-2 or MW-3.

In addition, vinyl chloride was detected at MW-1, MW-12, and P-9 at concentrations above its NR 140 ES. This area was further defined by groundwater sampling from P-3 through P-8 and MW-2, MW-3, MW-4, MW-5, MW-7, MW-8, MW-9, and MW-10, which were all no detect for vinyl chloride.

The groundwater results indicate the groundwater impacts are defined and limited to the site, have shown decreasing trends, and are able to be controlled using natural attenuation.

- J. Identify how all exposure pathways (soil, groundwater, vapor) were removed and/or adequately addressed by immediate, interim and/or remedial action(s).

P-25/MW-11 was installed near P-11, which was the area of confirmed DEHP free product. A hot spot source removal excavation was completed in the area of MW-11 and MW-8, to remove the highest levels of shallow impacts from the Site. A total of approximately 40 tons of soil was excavated and loaded into three rollbox containers for shipment and disposal by Waste Management. Concentrations of DEHP were detected in the shallow soil samples collected from soil borings GP-9, GP-18, P-1, P-9, P-10 (P-11), P-12, P-25, and P-27 exceeding their non-industrial and industrial direct contact and/or soil to groundwater pathway RCLs. These impacts do not extend beyond ten feet bgs. The area of residual impacts (with the exception of GP-18) was capped with asphalt to mitigate potential direct contact risks and eliminate future water infiltration through the residual soil impacts and risk to groundwater quality. The remaining impacts on site will be addressed through the implementation of a Cap Maintenance Plan (CMP).

DEHP remains at concentrations above its NR 140 enforcement standard (ES) in the groundwater samples collected from MW-11, MW-12, and MW-13. DEHP remains at concentrations above its NR 140 preventive action limit (PAL) in the groundwater samples collected from MW-1, MW-4, MW-5, and MW-9. In addition, vinyl chloride was detected at MW-1, MW-12, and P-9 at concentrations above its NR 140 ES. The groundwater results indicate the groundwater impacts are defined and limited to the site, have shown decreasing trends, and are able to be controlled using natural attenuation.

Vapor intrusion evaluation indicate VOCs were detected at concentrations above the level of detection (LOD) in samples collected from both sub-slab vapor monitoring points; however, the detected concentrations were below applicable residential and commercial vapor risk screening levels (VRSLs). In addition, DEHP was not detected at concentrations above the level of detection (LOD) in samples collected from both sub-slab vapor monitoring points. As such, no vapor

intrusion risk is present at the Site.

FEC collected a surface water sample from the drainage swale that runs along the eastern portion of the property flowing from north to south and connected to the municipal storm sewer system near MW-5 (near the leading edge of the plume) and analyzed it for DEHP. No concentration of DEHP was detected in the surface water sample. As such, no sediment sampling was required.

- K. Identify any system hardware anticipated to be left in place after site closure, and explain the reasons why it will remain.
Not applicable.
- 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.
NR 140 ES exemption for vinyl chloride at MW-1 and MW-12.
NR 140 ES exemption for DEHP at MW-11, MW-12, and MW-13.
NR 140 PAL exemption for DEHP at MW-1, MW-4, MW-5, and MW-9.
- 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, no action levels or VRSLs exceeded.
- 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.
Not applicable. FEC collected a surface water sample from the drainage swale that runs along the eastern portion of the property flowing from north to south and connected to the municipal storm sewer system near MW-5 (near the leading edge of the plume) and analyzed it for DEHP. No concentration of DEHP was detected in the surface water sample. As such, no sediment sampling was required.

5. Continuing Obligations: Includes all affected properties and rights-of-way (ROWs). 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 (database fees will apply, ii. - xiv.)	Maintenance Plan Required	
Property Type:					
Source Property	Affected Property (Off-Source)	ROW			
i.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	None of the following situations apply to this case closure request.	NA
ii.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Residual groundwater contamination exceeds ch. NR 140 ESs.	NA
iii.	<input checked="" type="checkbox"/>	<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"/>	<input type="checkbox"/>	• Not Abandoned (filled and sealed)	NA
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	• Continued Monitoring (requested or required)	Yes
v.	<input checked="" type="checkbox"/>	<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"/>	<input type="checkbox"/>	Cover/Barrier/Engineered Cover or Control for (soil) groundwater infiltration pathway	Yes
vii.	<input type="checkbox"/>	<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"/>	<input type="checkbox"/>	Residual soil contamination meets NR 720 industrial soil RCLs, land use is classified as industrial	NA
ix.	<input type="checkbox"/>	<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"/>	<input type="checkbox"/>	NA	Vapor: Dewatering System needed for VMS to work effectively	Yes
xi.	<input type="checkbox"/>	<input type="checkbox"/>	NA	Vapor: Compounds of Concern in use: full vapor assessment could not be completed	NA
xii.	<input type="checkbox"/>	<input type="checkbox"/>	NA	Vapor: Commercial/industrial exposure assumptions used.	NA
xiii.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Vapor: Residual volatile contamination poses future risk of vapor intrusion	NA
xiv.	<input type="checkbox"/>	<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. ATP 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 (<https://dnrm.wi.gov/H5/?viewer=rrsites>) 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: <https://dnr.wisconsin.gov/topic/Brownfields/Professionals.html#tabx2>.
 - 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 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).
- ☐ 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.

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 Public 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 <https://dnr.wi.gov/DocLink/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.

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.

Notifications to Owners of Affected Properties (Attachment G)

[illegible]

Signatures and Findings for Closure Determination

This page has been updated as of February 2019 to comply with the requirements of Wis. Admin. Code ch. NR 712.

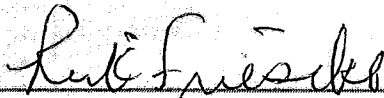
Check the correct box for this case closure request and complete the corresponding certification statement(s) listed below to demonstrate that the requirements of Wis. Admin. Code ch. NR 712 have been met. The responsibility for signing the certification may not be delegated per Wis. Admin. Code § NR 712.09 (1). Per Wis. Admin. Code § 712.05 (1), the work must be conducted or supervised by the person certifying.

- ☒ The investigation and/or response action(s) for this site evaluated and/or addressed groundwater (including natural attenuation remedies). Both a professional engineer and a hydrogeologist must sign this document per Wis. Admin. Code ch. NR 712.
- ☐ The investigation and the response action(s) for this site did not evaluate or address groundwater. A professional engineer must sign this document per Wis. Admin. Code ch. NR 712.

Engineering Certification

I, Richard Friesek, 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 document has been prepared in accordance with the Rules of Professional Conduct in ch. A-E 8, Wis. Adm. Code; and that, to the best of my knowledge, all information contained in this document is correct and the document was prepared in compliance with all applicable requirements in chs. NR 700 to 726, Wis. Adm. Code.

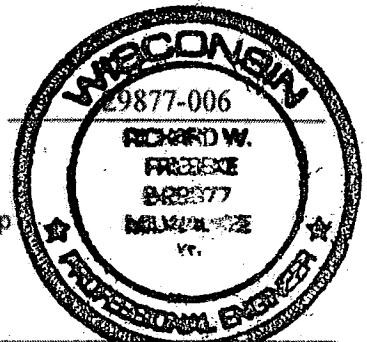
Signature



P. E. #

Title President

P.E. Stamp

**Hydrogeologist Certification**

I, Greg Konicek, hereby certify that I am a hydrogeologist as that term is defined in s. NR 712.03 (1), Wis. Adm. Code, am registered in accordance with the requirements of ch. GHSS 2, Wis. Adm. Code, or licensed in accordance with the requirements of ch. GHSS 3, Wis. Adm. Code, and that, to the best of my knowledge, all of the information contained in this document is correct and the document was prepared in compliance with all applicable requirements in chs. NR 700 to 726, Wis. Adm. Code.

Signature

Title Hydrogeologist

Date

08/03/2023