



May 29, 2024

VPI Corporation
Attn: Jeff Udovich
3123 South 9th Street
Sheboygan, WI 53082
Via Electronic Mail Only to jjudovich@vpicorp.com

KEEP THIS LEGAL DOCUMENT WITH YOUR PROPERTY RECORDS

SUBJECT: Case Closure with Continuing Obligations
Vinyl Plastics (Former), 3123 South 9th Street, Sheboygan, WI 53082
BRRTS #: 02-60-001045, FID #: 460041560

Dear Mr. Udovich:

The Wisconsin Department of Natural Resources (DNR) is pleased to inform you that the Vinyl Plastics (Former) contamination case identified above met the requirements of Wisconsin Administrative (Wis. Admin.) Code chs. NR 700 to 799 for case closure with continuing obligations (COs). COs are legal requirements to address potential exposure to remaining contamination. No further investigation or remediation is required at this time for the reported hazardous substance discharge and/or environmental pollution.

However, you, future property owners and occupants of the property must comply with the COs as explained in this letter, which may include maintaining certain features and notifying the DNR and obtaining approval before taking specific actions. You must provide this letter and all enclosures to anyone who purchases, rents, or leases this property from you.

This case closure decision is issued under Wis. Admin. Code chs. NR 700 to 799 and is based on information received by the DNR to date. The DNR reviewed the case closure request for compliance with state laws and standards and determined the case closure request met the notification requirements of Wis. Admin. Code ch. NR 725, the response action goals of Wis. Admin. Code § NR 726.05(4), and the case closure criteria of Wis. Admin. Code §§ NR 726.05, 726.09 and 726.11, and Wis. Admin. Code ch. NR 140.

The Vinyl Plastics (Former) site was investigated for a discharge of hazardous substances and/or environmental pollution from a plasticizer that was formerly used in the manufacturing of flooring products. Case closure is granted for volatile organic compounds (VOCs) and semi-volatile organic compounds (SVOCs) (primarily bis(2-ethylhexyl) phthalate (DEHP)) sampled in soil and groundwater, VOCs sampled in sub-slab vapor and DEHP sampled in surface water as documented in the case file. The site investigation and/or remedial action addressed soil and groundwater. The remedial action consisted of an excavation of contaminated soil and landfill disposal to remove the highest contaminant concentration and cap the remaining contamination with asphalt or concrete. DEHP contamination remains in soil and DEHP and VOC contamination remain in groundwater on the southern portion of the site.

The case closure decision and COs required were based on the current use of the site for industrial purposes. The site is currently zoned industrial. Based on the land use and zoning, the site meets the industrial land use classification under Wis. Admin. Code § NR 720.05(5) for application of residual contaminant levels in soil.

SUMMARY OF CONTINUING OBLIGATIONS

COs are applied at the following location:

ADDRESS (Sheboygan, WI)	COs APPLIED	DATE OF MAINTENANCE PLAN
3123 South 9 th Street (Source Property)	<ul style="list-style-type: none">Residual Soil ContaminationCover (for Soil)Residual Groundwater Contamination	August 1, 2023

CLOSURE CONDITIONS

Closure conditions are legally required conditions which include both COs and other requirements for case closure (Wisconsin Statute (Wis. Stat.) § 292.12(2)). Under Wis. Stat. § 292.12(5), you, any subsequent property owners and occupants of the property must comply with the closure conditions as explained in this letter. The property owner must notify occupants for any condition specified in this letter under Wis. Admin. Code §§ NR 726.15(1)(b) and NR 727.05(2). If an occupant is responsible for maintenance of any closure condition specified in this letter, you and any subsequent property owner must include the condition in the lease agreement under Wis. Admin. Code § NR 727.05(3) and provide the maintenance plan to any occupant that is responsible.

DNR staff may conduct periodic pre-arranged inspections to ensure that the conditions included in this letter and maintenance plan dated August 1, 2023, are met (Wis. Stat. § 292.11(8)). If these requirements are not followed, the DNR may take enforcement action under Wis. Stat. ch. 292 to ensure compliance with the closure conditions.

SOIL

Continuing Obligations to Address Soil Contamination

Residual Soil Contamination (Wis. Admin. Code chs. NR 718, NR 500 to 599, and § NR 726.15(2)(b) and Wis. Stat. ch. 289)

Soil contamination remains on the southern portion of the site as indicated on the enclosed map (Figure B.2.b., Residual Soil Contamination Diagram, dated 11-10-20). If soil in the location(s) shown on the map is excavated in the future, the property owner or right of way holder at the time of excavation must sample and analyze the excavated soil. If sampling confirms that contamination is present, the property owner or right of way holder at the time of excavation will need to determine if the material is considered solid waste and ensure that any storage, treatment, or disposal complies with applicable standards and rules. Contaminated soil may be managed under Wis. Admin. Code ch. NR 718 with prior DNR approval. If soil is exposed in the source area around the tanks and plasticizer building in the future, excavation should be considered due to the high contaminant concentrations.

In addition, all current and future property owners, occupants and right of way holders need to be aware that excavation of the contaminated soil may pose an inhalation and direct contact hazard; special precautions may be needed to prevent a threat to human health.

Cover (for soil) (Wis. Stat. § 292.12(2)(a), Wis. Admin. Code §§ NR 724.13(1) and (2), NR 726.15(2)(d) and/or (e), NR 727.07(1))

The asphalt pavement and concrete building foundations, as shown on the enclosed map (Figure D.2., Cap Maintenance Diagram, dated 11-10-20) shall be maintained in compliance with the enclosed maintenance plan, dated August 1, 2023. The purpose of the cover is to minimize the infiltration of water through contaminated soil and prevent direct contact with residual soil contamination that might otherwise pose a threat to human health.

The cover approved for this closure was designed to be protective for commercial or industrial land uses. Before using the property for residential purposes and before taking an action, the property owner must notify the DNR to determine if additional response actions are warranted. A cover intended for industrial land uses or certain types of commercial land uses may not be protective if the property changes to a residential use. 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 designed for multi-family residential housing use may not be appropriate for use at a single-family residence.

To modify or replace a cover, the property owner must submit a request to the DNR under Wis. Admin. Code ch. NR 727. The DNR approval must be obtained before implementation. The replacement or modified cover must be a structure of similar permeability or be protective of the revised use of the property until contaminant levels no longer exceed Wis. Admin. Code ch. NR 720 groundwater pathway residual contaminant levels and/or direct contact residual contaminant levels (RCLs).

GROUNDWATER

Continuing Obligations to Address Groundwater Contamination and/or Monitoring Wells

Residual Groundwater Contamination (Wis. Admin. Code ch. NR 140 and § NR 812.09(4)(w))

Groundwater contamination which equals or exceeds the enforcement standards for vinyl chloride (VC) and DEHP is present in the southern portion of the site, as shown on the enclosed maps (Figure B.3.b.1., Groundwater Isoconcentration Diagram (DEHP), dated 11-10-20 and Figure B.3.b.2., Groundwater Isoconcentration Diagram (VC), dated 11-10-20). To construct a new well or reconstruct an existing well, the property owner must obtain prior DNR approval. Additional casing may be necessary to prevent contamination of the well.

OTHER CLOSURE REQUIREMENTS

Maintenance Plan and Inspection Log (Wis. Admin. Code §§ NR 726.11(2), NR 726.15(1)(d), NR 727.05(1)(b)3., Wis. Admin. Code § NR 716.14(2) for monitoring wells)

The property owner is required to comply with the enclosed maintenance plan dated August 1, 2023, for the cover, to conduct inspections annually and to use the inspection log (DNR Form 4400-305) to document the required inspections. The maintenance plan and inspection log are to be kept up-to-date and on-site. The property owner shall submit the inspection log to the DNR only upon request, using the RR Program Submittal Portal. See the DNR Notification and Approval Requirements section below for more information on how to access the Submittal Portal.

The limitations on activities are identified in the enclosed maintenance plan. The following activities are prohibited on any portion of this property where the cover is required, without prior DNR approval.

- Removal of the existing barrier;
- Replacement with another barrier;
- Excavating or grading of the land surface;
- Filling on capped or paved areas;
- Plowing for agricultural cultivation; or

- Construction or placement of a building or other structure.

Pre-Approval Required for Well Construction (Wis. Admin. Code § NR 812.09(4)(w))

DNR approval is required before well construction or reconstruction for all sites identified as having residual contamination and/or COs. This requirement applies to private drinking water wells and high-capacity wells. To obtain approval, the property owner is required to complete and submit Form 3300-254, Continuing Obligations/Residual Contamination Well Approval Application, to the DNR Drinking and Groundwater program's regional water supply specialist. A well driller can help complete this form. The form can be obtained online at dnr.wi.gov, search "3300-254." Additional casing may be necessary to help prevent contamination of the well.

General Wastewater Permits for Construction-related Dewatering Activities (Wis. Admin. Code ch. NR 200)

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 work and building construction.

If the property owner or any other person plans to conduct such activities, that person must contact the Water Quality Program and, if necessary, apply for the required discharge permit. 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, oil and grease, a general permit for pit/trench *Dewatering Operations* may be needed. Additional information can be obtained by visiting the DNR website at "dnr.wi.gov," search "wastewater general permits."

DNR NOTIFICATION AND APPROVAL REQUIREMENTS

Certain activities are limited at closed sites to maintain protectiveness to human health and the environment. The property owner is required to notify the DNR at least 45 days before and obtain approval from the DNR prior to taking the following actions (Wis. Admin. Code §§ NR 727.07, NR 726.15 (2), Wis. Stat. § 292.12(6)).

- Before removing a cover or any portion of a cover

The DNR may require additional investigation and/or cleanup actions, if necessary, to be protective of human health and the environment. The case may be reopened under Wis. Admin. Code § NR 727.13 if additional information indicates that contamination on or from the site poses a threat, or for a lack of compliance with a CO or closure requirement. Compliance with the maintenance plan is considered when evaluating the reopening criteria.

SUBMITTALS AND CONTACT INFORMATION

Site, case-related information and DNR contacts can be found online in the Bureau for Remediation and Redevelopment Tracking System (BRRTS) on the Web (BOTW); go to dnr.wi.gov and search "BOTW." Use the BRRTS ID # found at the top of this letter. The site can also be found on the map view, Remediation and Redevelopment Sites Map (RRSM) by searching "RRSM."

Send written notifications and inspection logs to the DNR using the RR Program Submittal Portal at dnr.wi.gov, search "RR submittal portal" (<https://dnr.wi.gov/topic/Brownfields/Submittal.html>). Questions on using this portal can be directed to the DNR project manager, Tauren Beggs, below or to the environmental program associate (EPA) for the regional DNR office. Visit dnr.wi.gov, search "RR contacts" and select the EPA tab (<https://dnr.wi.gov/topic/Brownfields/Contact.html>).

CLOSING

The DNR appreciates your efforts to restore the environment at this site. If you have any questions regarding this letter, please contact DNR project manager Tauren Beggs at (920) 510-3472 or Tauren.Beggs@wisconsin.gov.

Sincerely,



Trevor Nobile, P.G.
Field Operations Director
Remediation & Redevelopment Program

Attachments:

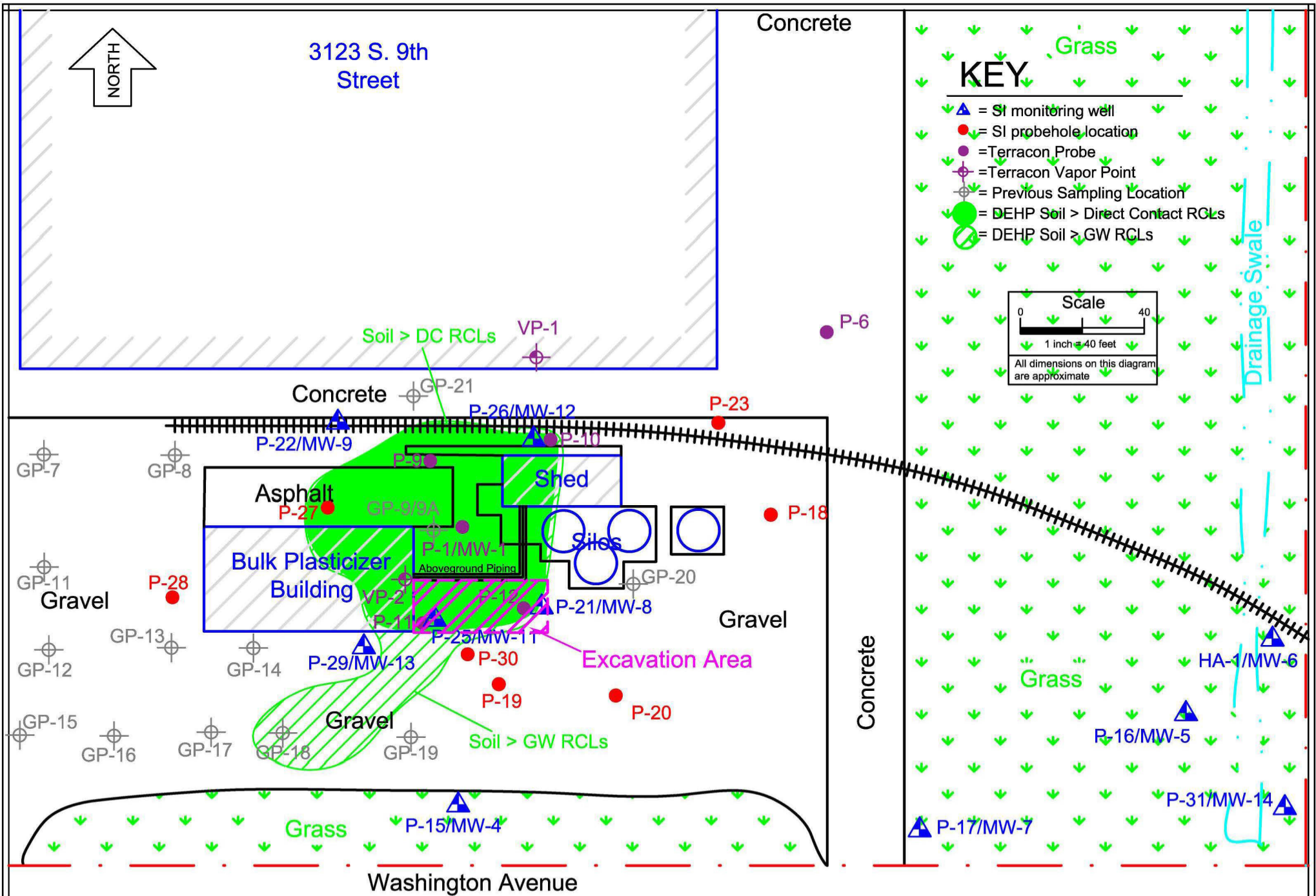
- Figure B.2.b., Residual Soil Contamination Diagram, dated 11-10-20
- Figure B.3.b.1., Groundwater Isoconcentration Diagram (DEHP), dated 11-10-20
- Figure B.3.b.2., Groundwater Isoconcentration Diagram (VC), dated 11-10-20
- Cap Maintenance Plan, dated August 1, 2023

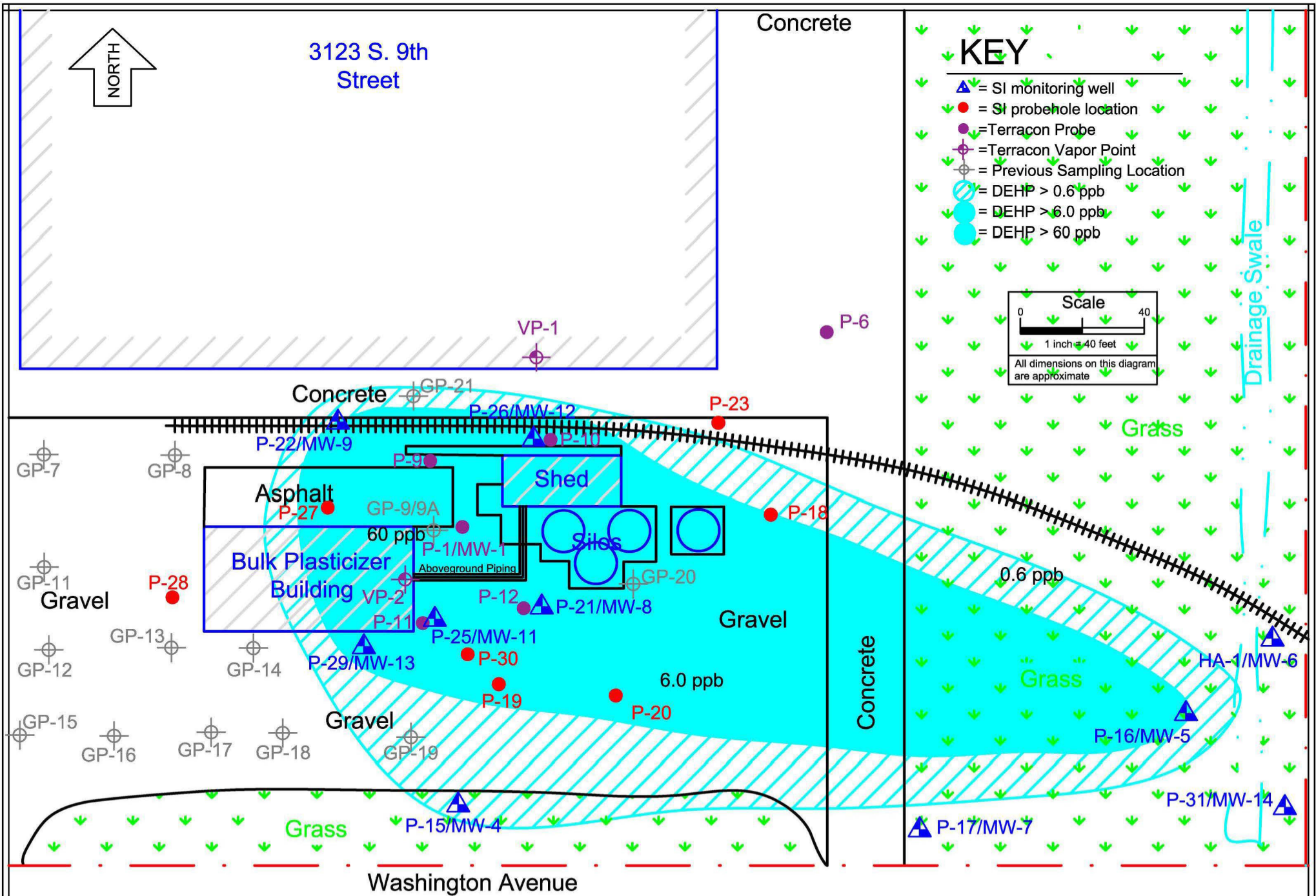
cc: Rick Frieseke, Friess Environmental Consulting, Inc. (rfrieseke@fecinc.us)
Trent Ott, Friess Environmental Consulting, Inc. (tott@fecinc.us)

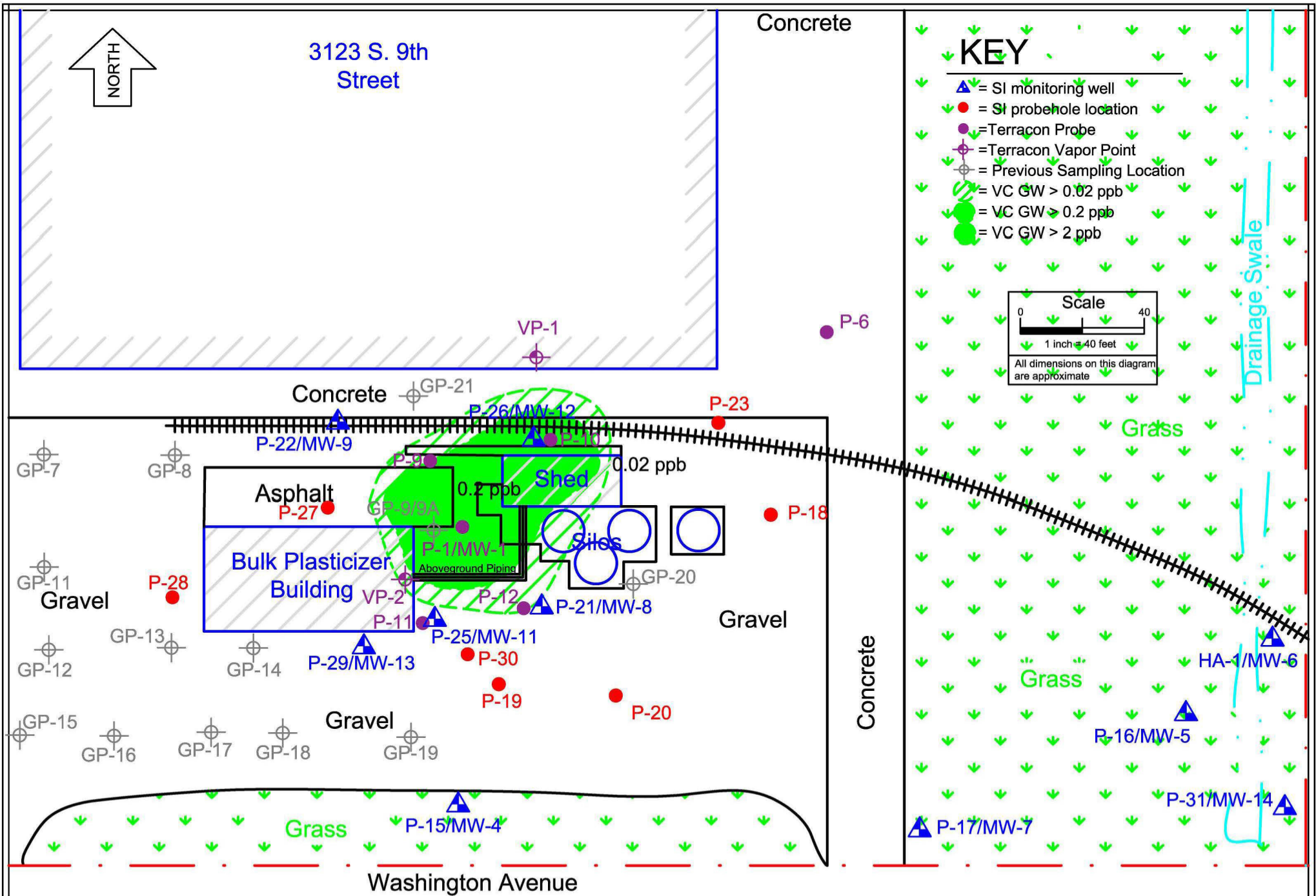
Additional Resources:

The DNR fact sheets listed below can be obtained by visiting the DNR website at “dnr.wi.gov,” search the DNR publication number.

- *Guidance for Electronic Submittals for the Remediation and Redevelopment Program* (RR-690)
- *Continuing Obligations for Environmental Protection* (RR-819)
- *Environmental Contamination and Your Real Estate* (RR-973)
- *Post-Closure Modifications: Changes to Property Conditions after a State-Approved Cleanup* (RR-987)
- *Using Natural Attenuation to Clean Up Contaminated Groundwater: What Landowners Should Know* (RR-671)







File No.: 200208 B.1.a2
 DWG Date: 6-9-20
 Rev Date: 11-10-20
 Drawn By: BRF
 Checked By (PM): TJO

B.3.b.2. Groundwater Isoconcentration Diagram (VC)
 3123 South 9th Street
 Sheboygan, Wisconsin

Figure
 B.3.b.2.

CAP MAINTENANCE PLAN

August 1, 2023

Property Located at:

3123 South 9th Street, Sheboygan, Wisconsin

VPI Corporation

Parcel No. 59281312560

FID No. 460041560

BRRTS No. 02-60-001045

Described as follows:

Those parts of the Northeast ¼ of the Southwest ¼ of Section 35, Township 15 North, Range 23 East, in the City of Sheboygan, Sheboygan County, Wisconsin, bounded and described in Exhibit A.

Introduction:

This document is the Maintenance Plan for a cap at the above-referenced property (the “Property”) in accordance with the requirements of s. NR 724.13(2), Wisconsin Administrative Code. The maintenance activities relate to the existing cap within specific areas of the Property.

More site-specific information about the Property may be found in:

- The case file in the Wisconsin Department of Natural Resources (DNR) southeast regional office
- BRRTS on the Web (DNR's internet based data base of contaminated sites): <http://botw.dnr.state.wi.us/botw/SetUpBasicSearchForm.do>
- GIS Registry PDF file for further information on the nature and extent of contamination: <http://dnrmmaps.wisconsin.gov/imf/imf.jsp?site=brrts2> and
- The DNR project manager (contact information found on the last page).

Description of Residual Impacts:

The property is an approximately 10.28-acre parcel improved with an approximately 110,000-square-foot 1-story manufacturing facility currently operated by the VPI Corporation. The zoning is consistent with the current and planned future use. An ERP case 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) was investigated between 1994 and 1996 and included soil and groundwater sampling. Additional investigation including soil and groundwater sampling was conducted from 2020 to 2023. The area of investigation was generally confined to the southern portion of the property near the bulk plasticizer storage building where the spill was reported to have occurred. DEHP is present in soil at concentrations above its residual contaminant level (RCL) for the direct contact pathway and groundwater pathway. The impacts are currently capped with a building, asphalt, and concrete paved areas. Based on the soil sampling results, the residual soil impacts will be addressed through maintaining the existing caps as direct contact barriers and to limit precipitation infiltration. FEC has submitted a site investigation report, a closure request, and soil and groundwater Geographic information System (GIS) packet to the DNR.

Description of the Cap to be maintained:

The building foundation and concrete/asphalt paved areas (these features combined construe the “Cap”) that exist over residual soil impacts on the above-described property in the locations shown on the attached map (Figure D.2.) serve as a barrier to limit precipitation infiltration and to prevent direct human contact with residual soil impacts that might otherwise pose a threat to human health. Based on the current and future use of the Property, the Cap should function as intended unless disturbed.

Annual Inspection:

The Cap overlying residual soil impacts and as depicted on Figure D.2. will be inspected once a year, normally in the spring after all snow and ice is gone, for deterioration, cracks and other potential problems that can cause exposure to underlying soils. The inspections will be performed by the Property owner or their designated representative. The inspections will be performed to evaluate damage due to settling, exposure to the weather, wear from traffic, increasing age, and other factors. Any area where soils have become or are likely to become exposed will be documented. A log of the inspections and any repairs will be maintained by the Property owner and is included as Exhibit C, “Cap Inspection Log.” The inspection log will include recommendations for necessary repair of any areas of the Cap where underlying soils are exposed. Once repairs are completed, they will be documented in the inspection log. A copy of the inspection log will be kept at the address of the Property owner and available for submittal or inspection by DNR representatives upon their request.

Maintenance Activities:

If problems are noted during the annual inspections or at any other time during the year, repairs will be scheduled as soon as practical. Repairs can include patching and filling or larger resurfacing or construction operations. If necessary maintenance activities expose the underlying soil, the Property owner must inform maintenance workers of the direct contact exposure hazard and provide them with appropriate personal protection equipment (PPE). The Property owner must also sample any soil that is excavated from the Property prior to disposal to ascertain if soil impacts remain. The soil must be treated, stored, and disposed of by the Property owner in accordance with applicable local, state, and federal law.

In the event the Cap overlying the residual soil impacts is removed or replaced, the replacement barrier must be equivalent for the purpose of minimizing precipitation infiltration and direct contact with the underlying soils. Any replacement barrier will be subject to the same maintenance and inspection guidelines as outlined in this Cap Maintenance Plan unless indicated otherwise by the DNR or its successor.

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

Prohibition of Activities and Notification of DNR Prior to Actions Affecting the Cap:


The following activities are prohibited on any portion of the Property where the Cap is required as shown on Figure D.2., unless prior written approval has been obtained from the DNR: (1) removal of the existing cap; (2) replacement of the cap with another barrier; (3) excavating or grading of the land surface; (4) filling on the capped surface; (5) plowing for agricultural cultivation; and (6) construction or placement of a building or other structure within the capped area.

Amendment or Withdrawal of Maintenance Plan:

This Maintenance Plan can be amended or withdrawn by the Property owner and its successors with the written approval of DNR.

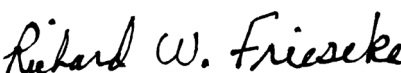
Contact Information (as of August 2023):

Site Owner and Operator: VPI Corporation
Mr. Jeff Udovich
3123 South 9th Street
Sheboygan, Wisconsin
(920) 451-5814

Signature: 

Mr. Jeff Udovich

Consultant: Friess Environmental Consulting, Inc.
Attn: Rick Frieseke
6635 North Sidney Place
Milwaukee, WI 53209
(414) 228-9815

Signature: 

DNR: Ms. Roxanne Chonert
Hydrogeologist
Wisconsin Department of Natural Resources
Resources 625 E CTH Y, STE 700
Oshkosh WI 54901-9731

EXHIBIT A

SCHEDULE C

Commitment No: FA 17485RS

Owners Policy (Form B) No: op 6408862

Residential Owners Policy No: NONE

Loan Policy No: LP 5021119

The land referred to in this Commitment/Policy is situated in the State of WISCONSIN, County of SHEBOYGAN and is described as follows:

Parcel 1:

A part of Blocks 18, 19, and 20, Lake View Park Subdivision, a part of vacated South 8th Street, vacated Monroe Avenue, and a part of vacated Unnamed Street, and a part of the SE1/4 SW1/4 of Section 35, Township 15 North, Range 23 East, City of Sheboygan, Wisconsin, described as: Beginning at the intersection of the North line of Washington Avenue with the East line of South 9th Street; thence North 1,219.44 feet along said East line to the South line of Wilson Avenue; thence S.89°57'E., 278.20 feet along said South Line; thence South 350.00 feet; thence S.89°57'E., 140 feet; thence North 350.00 feet to the South line of Wilson Avenue; thence S.89°57'E., 72.75 feet along said South line; thence S.00°05'W., 1,216.87 feet to the North line of Washington Avenue; thence S.89°45'W., 489.10 feet along said North line to the point of beginning, Sheboygan County, Wisconsin, BUT EXCEPTING THEREFROM:

Lot 1, Volume 17 of Certified Survey Maps, page 209, being a part of Lots 11-28, Block 20, vacated East-West alley adjacent to said Lots, vacated North-South alley adjacent to said Lots, and part of vacated Monroe Court adjacent to said Lots and vacated North-South alley, Lake View Park Subdivision, being part of the NE1/4 of the SW1/4 of Section 35, Town 15 North, Range 23 East, City of Sheboygan, Sheboygan County, Wisconsin.

Parcel 2:

Also an easement for a railroad siding from a point in an existing spur track near the Southeast corner of aforesaid Southeast Quarter (SE1/4) of the Southwest Quarter (SW1/4) to a point in the South line of Washington Street approximately Four hundred eighty-one (481) feet East of the East line of South Ninth Street, Sheboygan County, Wisconsin, as created by Warranty Deed executed by Wisconsin Power & Light Company to Great Lakes Homes, Inc., under date of March 29, 1960, and recorded in the office of the Register of Deeds for Sheboygan County, Wisconsin, on March 29, 1960 at 2:52 P.M. in Volume 397 of Deeds, pages 581/3, Document #743918.

Parcel 3:

Together with easement rights acquired in Volume 547 of Records on Pages 501/4.

Parcel 4:

Together with easement rights acquired in Volume 1510 of Records on Pages 209/11.

Tax Key Number 59281 312560.

ALTA/ACSM LAND TITLE SURVEY

KNOWN AS 3123 SOUTH 9TH STREET, CITY OF SHEBOYGAN, SHEBOYGAN COUNTY, WISCONSIN

PARCEL 1
A PART OF BLOCKS 18, 19, AND 20, LAKE VIEW PARK SUBDIVISION, A PART OF VACATED SOUTH 9TH STREET, VACATED MONROE AVENUE, AND A PART OF VACATED UNNAMED STREET, AND A PART OF THE SW1/4 SW1/4 SECTION 38, TOWNSHIP 18 NORTH, RANGE 23 EAST, CITY OF SHEBOYGAN, WISCONSIN, DESCRIBED AS BEGINNING AT THE INTERSECTION OF THE NORTH LINE OF WASHINGTON AVENUE WITH THE EAST LINE OF SOUTH 9TH STREET, THENCE NORTH 1,219.44 FEET ALONG SAID EAST LINE TO THE SOUTH LINE OF WILSON AVENUE, THENCE S 89°37' E, 278.39 FEET ALONG SAID SOUTH LINE, THENCE SOUTH 350.00 FEET, THENCE S 89°37' E, 140 FEET, THENCE NORTH 350.00 FEET TO THE SOUTH LINE OF WILSON AVENUE, THENCE S 89°37' E, 22.75 FEET ALONG SAID SOUTH LINE, THENCE S 00°00' W, 1,218.92 FEET TO THE NORTH LINE OF WASHINGTON AVENUE, THENCE S 89°45' W, 499.15 FEET ALONG SAID NORTH LINE TO THE POINT OF BEGINNING, SHEBOYGAN COUNTY, WISCONSIN, BUT EXCEPTING THEREFROM:
LOT 1, VOLUME 17 OF CERTIFIED SURVEY MAPS, PAGE 209, BEING A PART OF LOTS 11-29, BLOCK 20, VACATED EAST WEST ALLEY ADJACENT TO SAID LOTS, VACATED NORTH-SOUTH ALLEY ADJACENT TO SAID LOTS, AND PART OF VACATED MONROE COURT ADJACENT TO SAID LOTS AND VACATED NORTH-SOUTH ALLEY, LAKE VIEW PARK SUBDIVISION, BEING PART OF THE NE1/4 OF THE SW1/4 OF SECTION 35, TOWN 15 NORTH, RANGE 23 EAST, CITY OF SHEBOYGAN, SHEBOYGAN COUNTY, WISCONSIN.

PARCEL 2
ALSO AN EASEMENT FOR A RAILROAD SIDING FROM A POINT IN AN EXISTING SPUR TRACK NEAR THE SOUTHEAST CORNER OF AFORESAID SOUTHEAST QUARTER (SE1/4) OF THE SOUTHWEST QUARTER (SW1/4) TO A POINT IN THE SOUTH LINE OF WASHINGTON STREET APPROXIMATELY FOUR HUNDRED EIGHTY-ONE (481) FEET EAST OF THE EAST LINE OF SOUTH NINTH STREET, SHEBOYGAN COUNTY, WISCONSIN.

DECEMBER 14, 2004 VPI LLC SURVEY NO 162102 LN
REVISED CERTIFICATE REVISION NO 1 - 25
REVISED CERTIFICATE REVISION NO 2 - 5-H

NOTES

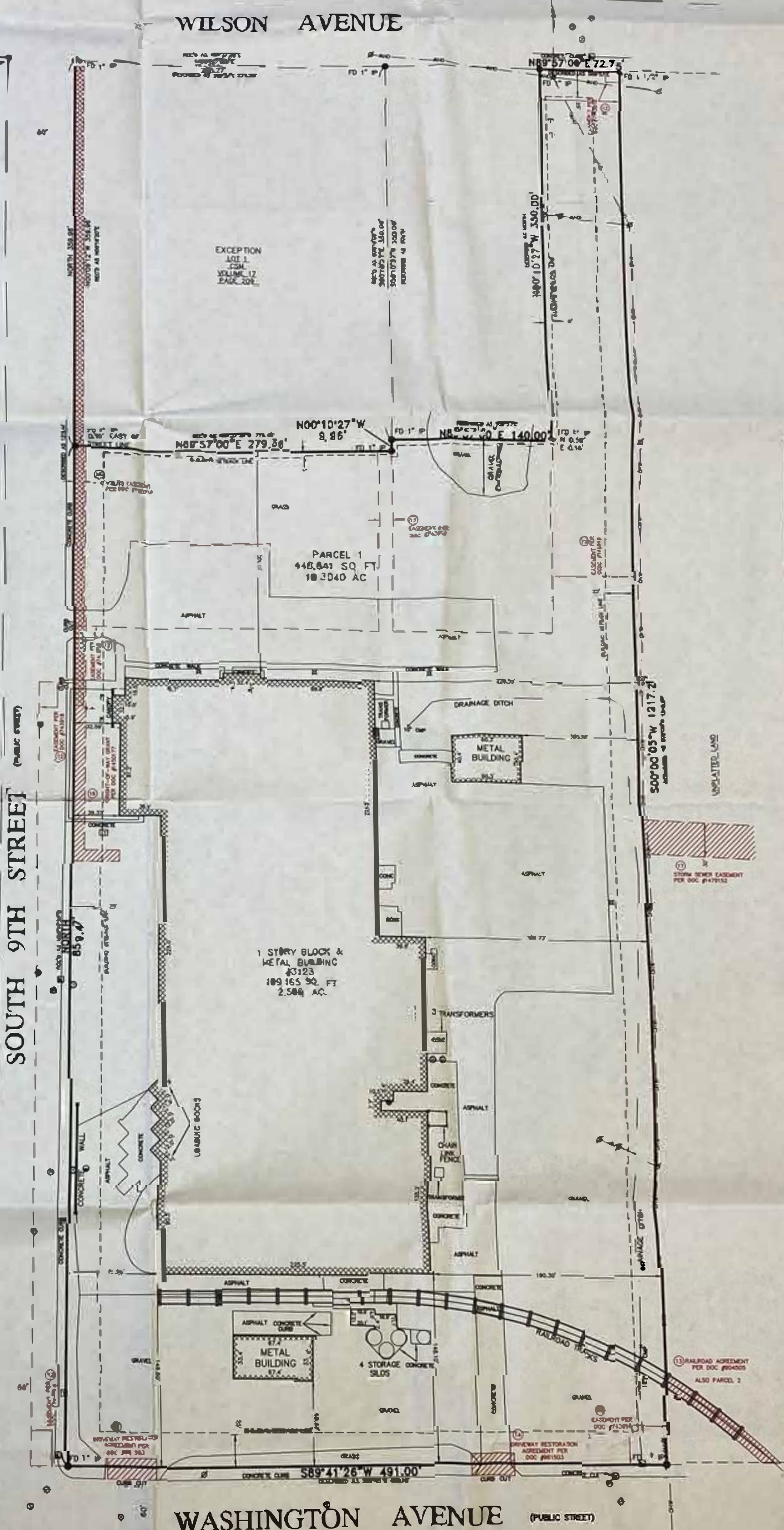
- A. BEARINGS ARE BASED ON THE EAST LINE OF SOUTH 9TH STREET WHICH IS ASSUMED TO BEAR NORTH.
- B. THIS SURVEY WAS PREPARED BASED ON SHEBOYGAN COUNTY ABSTRACT COMPANY TITLE COMMITMENT NO. FA 17485RS, EFFECTIVE DATE OF OCTOBER 15, 2004, WHICH LISTS THE FOLLOWING EASEMENTS AND/OR RESTRICTIONS:
 10. EASEMENT TO WISCONSIN PUBLIC SERVICE CORPORATION, DATED SEPTEMBER 26, 1957 AND RECORDED IN THE OFFICE OF THE REGISTER OF DEEDS FOR SHEBOYGAN COUNTY, WISCONSIN, OCTOBER 14, 1957 AT 8:14 A.M. IN VOLUME 7 OF CONTRACTS ON PAGES 3469 AS DOCUMENT NUMBER 688872, A COPY OF WHICH IS ATTACHED HERETO. DOES NOT AFFECT SITE BY LOCATION - CANNOT BE PLOTTED.
 11. EASEMENT TO THE CITY OF SHEBOYGAN, DATED NOVEMBER 28, 1956 AND RECORDED IN THE OFFICE OF THE REGISTER OF DEEDS FOR SHEBOYGAN COUNTY, WISCONSIN, DECEMBER 8, 1956 AT 9:26 A.M. IN VOLUME 8 OF CONTRACTS ON PAGES 34850 AS DOCUMENT NUMBER 714466, A COPY OF WHICH IS ATTACHED HERETO. DOES NOT AFFECT SITE BY LOCATION - CANNOT BE PLOTTED.
 12. EASEMENT TO GREAT LAKES HOMES, INC., DATED MARCH 28, 1960 AND RECORDED IN THE OFFICE OF THE REGISTER OF DEEDS FOR SHEBOYGAN COUNTY, WISCONSIN, MARCH 29, 1960 AT 2:52 P.M. IN VOLUME 897 OF DEEDS ON PAGES 58193 AS DOCUMENT NUMBER 742918, A COPY OF WHICH IS ATTACHED HERETO. AFFECTS SITE BY LOCATION - SHOWN.
 13. AGREEMENT DATED MARCH 6, 1968 AND RECORDED IN THE OFFICE OF THE REGISTER OF DEEDS FOR SHEBOYGAN COUNTY, WISCONSIN, JULY 17, 1968 AT 3:48 P.M. IN VOLUME 547 OF DEEDS ON PAGES 5014 AS DOCUMENT NUMBER 904505, A COPY OF WHICH IS ATTACHED HERETO. DOES NOT AFFECT SITE BY LOCATION - SHOWN.
 14. DRIVEWAY RESTORATION AGREEMENT DATED MAY 30, 1973 AND RECORDED IN THE OFFICE OF THE REGISTER OF DEEDS FOR SHEBOYGAN COUNTY, WISCONSIN, JULY 26, 1973 AT 9:36 A.M. IN VOLUME 703 OF RECORDS ON PAGES 23940 AS DOCUMENT NUMBER 991593, A COPY OF WHICH IS ATTACHED HERETO. AFFECTS SITE BY LOCATION - SHOWN.
 15. UNDERGROUND ELECTRIC EASEMENT TO WISCONSIN POWER AND LIGHT COMPANY AND LAKESIDE CABLEVISION OF SHEBOYGAN, DATED MAY 12, 1985 AND RECORDED IN THE OFFICE OF THE REGISTER OF DEEDS FOR SHEBOYGAN COUNTY, WISCONSIN, MAY 23, 1985 AT 12:40 P.M. IN VOLUME 982 OF RECORDS ON PAGES 8034 AS DOCUMENT NUMBER 1115218, A COPY OF WHICH IS ATTACHED HERETO. AFFECTS SITE BY LOCATION - SHOWN.
 16. RIGHT-OF-WAY GRANT TO WISCONSIN BELL, INC., DATED APRIL 30, 1996 AND RECORDED IN THE OFFICE OF THE REGISTER OF DEEDS FOR SHEBOYGAN COUNTY, WISCONSIN, MAY 7, 1996 AT 3:25 P.M. IN VOLUME 1510 OF RECORDS ON PAGES 3378 AS DOCUMENT NUMBER 1450177, A COPY OF WHICH IS ATTACHED HERETO. AFFECTS SITE BY LOCATION - SHOWN.
 17. TERMS AND CONDITIONS OF EASEMENT TO VINYL PLASTICS, INC., DATED ---, AND RECORDED IN THE OFFICE OF THE REGISTER OF DEEDS FOR SHEBOYGAN COUNTY, WISCONSIN, JUNE 19, 1997 AT 11:11 A.M. IN VOLUME 1444 OF RECORDS ON PAGES 20911 AS DOCUMENT NUMBER 1478152, A COPY OF WHICH IS ATTACHED HERETO. DOES NOT AFFECT SITE BY LOCATION - SHOWN.
- C. ACCORDING TO FLOOD INSURANCE RATE MAP OF THE CITY OF SHEBOYGAN, COMMUNITY PANEL NO. 550430 0005D, EFFECTIVE DATE OF APRIL 2, 1991, THIS SITE FALLS IN ZONE X (AREAS OUTSIDE OF THE 500 YEAR FLOOD).
- D. THE BASIC ZONING INFORMATION LISTED BELOW IS TAKEN FROM MUNICIPAL CODES AND DOES NOT NECESSARILY REFLECT ANY AMENDMENTS THAT MAY APPLY. SITE IS ZONED URBAN INDUSTRIAL - U1.
 - FRONT SETBACK - 25'
 - SIDEYARD SETBACK - 5' OR 8' ON 20RD LOT LINE SIDE
 - REARYARD SETBACK - 25'
 - MAXIMUM HEIGHT - 36' (CAN EXCEED 60' WITH CONDITIONAL USE PERMIT)
- E. THERE IS NO OBSERVABLE EVIDENCE OF EARTH MOVING WORK, BUILDING CONSTRUCTION OR BUILDING ADDITIONS WITHIN RECENT MONTHS.
- F. THERE IS NO OBSERVABLE EVIDENCE OF RECENT STREET OR SIDEWALK CONSTRUCTION OR REPAIRS.
- G. THERE IS NO OBSERVABLE EVIDENCE OF THE SITE BEING USED AS A SOLID WASTE DUMP, SLIMP, OR SANITARY LANDFILL.

I HEREBY CERTIFY TO JP MORGAN CHASE N.A. AND ITS ASSIGNS, VPI LLC, MMW PROPERTIES, LLC AND SHEBOYGAN COUNTY ABSTRACT COMPANY THAT ON THE 14TH DAY OF DECEMBER, 2004, I SURVEYED THE ABOVE DESCRIBED PROPERTY.

- (A) THIS SURVEY WAS MADE ON THE GROUND AND CORRECTLY SHOWS ALL OF THE FOLLOWING: (i) THE BOUNDARIES AND AREAS OF THE SUBJECT PROPERTY AND THE SIZE, LOCATION AND TYPE OF ANY FOUNDATION, BUILDINGS, OVERHANGS, STOODS, DRIVEWAYS, SIDEWALKS, CURB CUTS, PATIOS AND OTHER AREAS IMPROVED WITH ASPHALT, CONCRETE OR SIMILAR SURFACES, FENCES AND OTHER IMPROVEMENTS AND STRUCTURES THEREON AND THE DISTANCE FROM BUILDINGS AND OTHER APPROPRIATE IMPROVEMENTS AND STRUCTURES TO THE NEAREST ADJACENT PROPERTY LINES OF THE SUBJECT PROPERTY; (ii) THE LOCATION OF ALL RIGHTS-OF-WAY, EASEMENTS AND ANY OTHER MATTERS OF RECORD (OR BE WHICH I HAVE KNOWLEDGE OR HAVE BEEN ADVISED, WHETHER OR NOT OF RECORD) ENCLAVING, BENEFITING OR OTHERWISE AFFECTING THE SUBJECT PROPERTY; (iii) THE LOCATION OF THE PARKING AREAS OF THE SUBJECT PROPERTY; (iv) ALL ADJUTING STREETS, ROADS, HIGHWAYS AND OTHER RIGHTS-OF-WAY TOGETHER WITH THE WIDTH, NAME AND STATUS (E.G., PUBLICLY DEDICATED, RESERVED FOR FUTURE PUBLIC USE, PRIVATE, ETC.) THEREOF; (v) THE STATUS OF ALL PROPERTY ADJACENT OR NEIGHBORING THE SUBJECT PROPERTY; AND (vi) ALL OTHER SIGNIFICANT ITEMS ON THE SUBJECT PROPERTY.
- (B) EXCEPT AS SHOWN THERE ARE NO ENCROACHMENTS UPON THE SUBJECT PROPERTY, NO ENCROACHMENT IS ON ADJACENT PROPERTY STREETS OR ALLEYS BY ANY IMPROVEMENTS ON THE SUBJECT PROPERTY, (ii) PARTY WALLS (iii) CONFLICTS OR PROTRUSIONS.
- (C) ADEQUATE ACCESS TO AND FROM THE SUBJECT PROPERTY IS PROVIDED BY SOUTH 9TH STREET AND WASHINGTON AVENUE, THE SAME BEING PAVED BECAUSE PUBLIC RIGHTS-OF-WAY MAINTAINED BY THE CITY OF SHEBOYGAN.
- (D) ALL BUILDING SETBACK LINES AFFECTING THE SUBJECT PROPERTY ARE LOCATED AS SHOWN HEREIN.
- (E) THIS SURVEY SHOWS ALL MATTERS REFLECTED ON THE COMMITMENT OF THIS INSURANCE ISSUED BY SHEBOYGAN COUNTY ABSTRACT COMPANY WITH AN EFFECTIVE DATE OF OCTOBER 15, 2004 SAID COMMITMENT ENCLOSES ALL REFERENCES AND VENEER NOTE "B".
- (F) THIS SURVEY IS MADE IN ACCORDANCE WITH THE MINIMUM STANDARD DETAIL REQUIREMENTS FOR ALTA/ACSM LAND TITLE SURVEY AS ESTABLISHED AND ADOPTED BY THE ALTA/ACSM IN 1998 AND INCLUDES HEADINGS 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15 AND 16 AS REQUIRED PURSUANT TO THE ACCURACY STANDARDS AS ADOPTED BY ALTA/ACSM, AND ALSO IN EFFECTION THE DATE OF HIS CERTIFICATION, I HEREBY SIGNIFY MY CERTIFICATION THAT:
 - (i) THE SURVEY MEASUREMENTS WERE MADE IN ACCORDANCE WITH THE MINIMUM ANGLE, DISTANCE, AND CLOSURE REQUIREMENTS FOR SURVEY MEASUREMENTS WITH CONTROL LAND BOUNDARIES FOR ALTA/ACSM LAND TITLE SURVEYS.
- (G) ACCORDING TO THE FIRM FLOOD INSURANCE RATE MAP COMMUNITY PANEL, NUMBERS 550430 0005D DATED APRIL 2, 1991, THE DESCRIBED PROPERTY FALLS IN FLOOD ZONE "X".

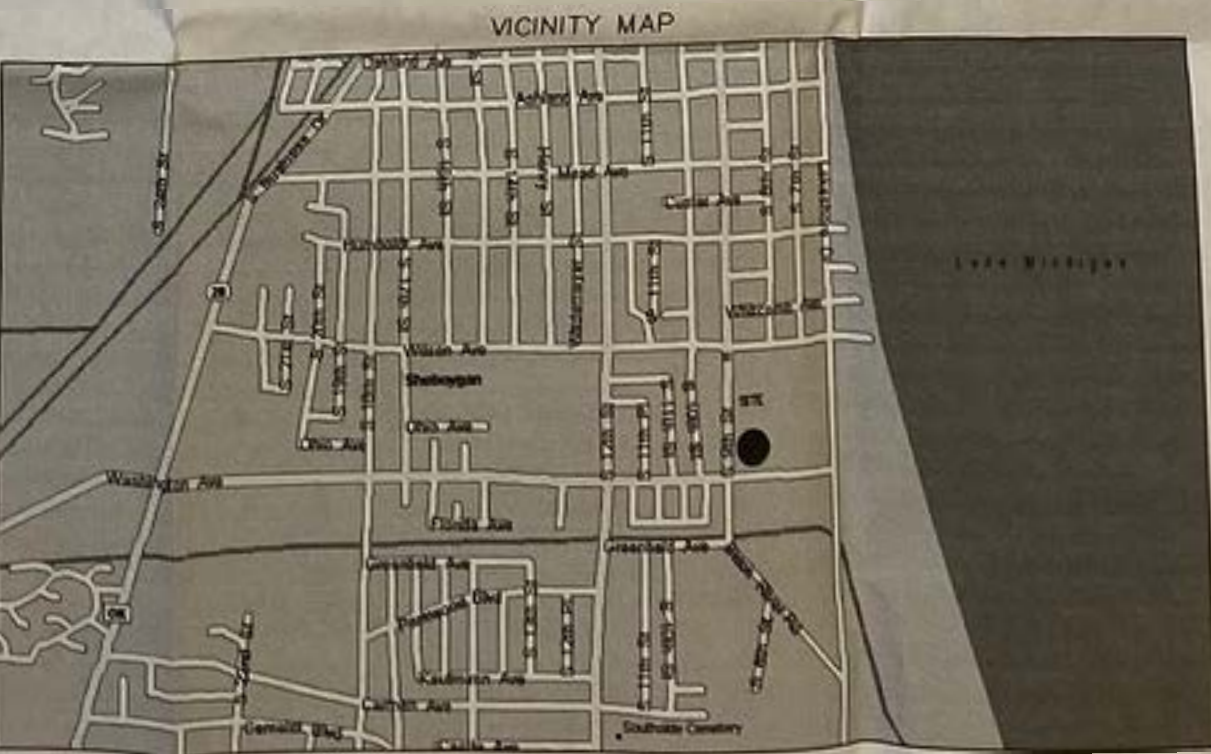
DECEMBER 14, 2004

Donald C. Chaput
REG. STATED LAND SURVEYOR
REGISTRATION NO. 8-1318



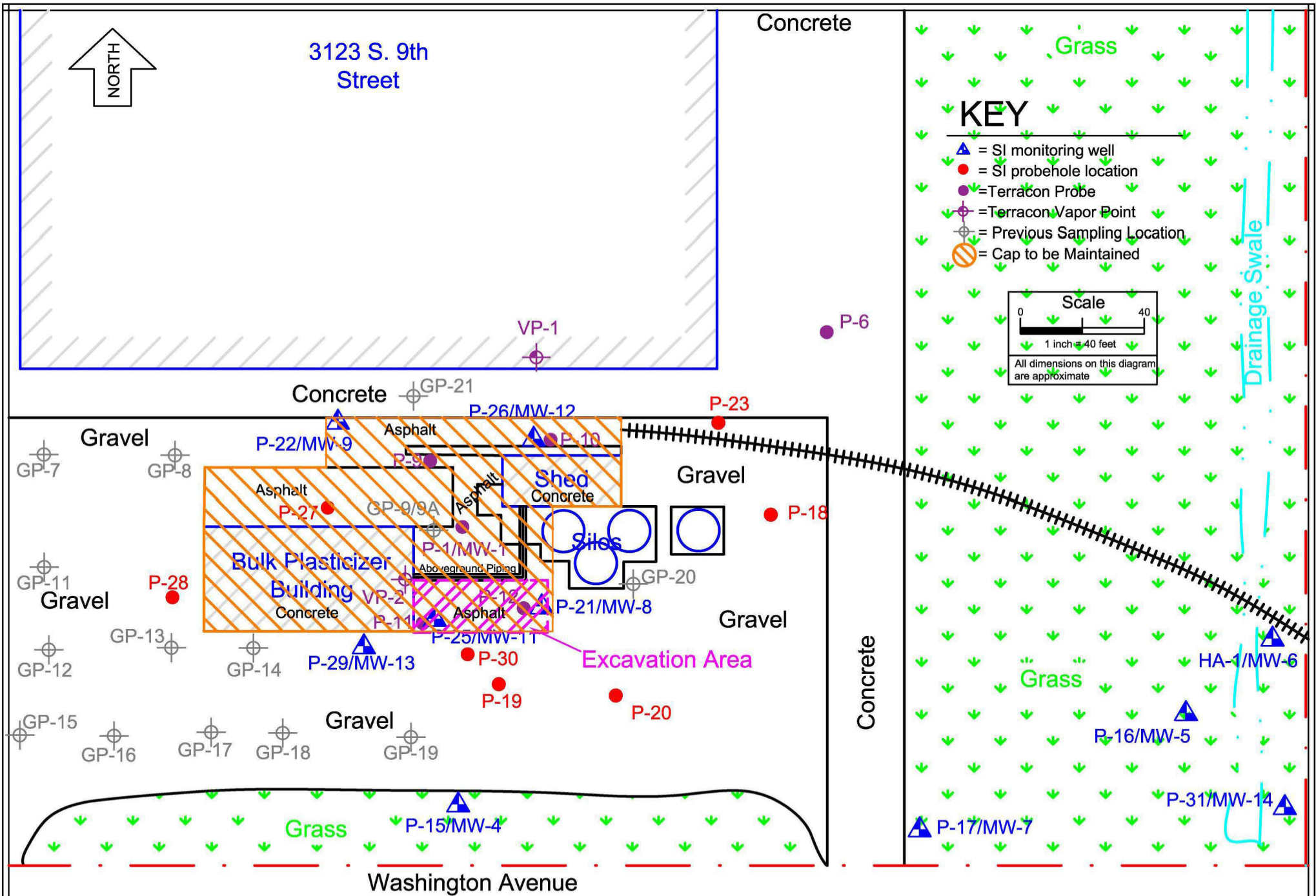
LEGEND

- ▲ BENCHMARK
 - SECTION CORNER
 - IRON PIPE FOUND
 - IRON PIPE SET
 - BOLLARD
 - + SOIL BORING/WATERING WELL
 - △ FLAGPOLE
 - ▽ WELLS
 - SIGN
 - TRAILBOARD
 - CONTROL BOX
 - TRAFFIC SIGNAL
 - Y RAILROAD CROSSING SIGNAL
 - CABLE PEDESTAL
 - POWER POLE
 - GUY WIRE
 - GUY WIRE
 - LIGHT POLE
 - SPOT/PAVEMENT LIGHT
 - GROUND OR OTHER SPOT SHOT
 - HANDICAPPED PARKING
 - ELECTRIC MANHOLE
 - ELECTRIC PEDESTAL
 - ELECTRIC METER
 - TELEPHONE MANHOLE
 - TELEPHONE PEDESTAL
 - FORWARD FROM OPTIC
 - GAS VALVE
 - GAS METER
 - STORM MANHOLE
 - ROUND INLET
 - SQUARE INLET
 - STORM SEWER END SECTION
 - SANITARY MANHOLE
 - SANITARY CLEANOUT OR SEPTIC VENT
 - SANITARY INTERCEPTOR MANHOLE
 - MISCELLANEOUS MANHOLE
 - WATER VALVE
 - HYDRANT
 - WATER SERVICE CURB STOP
 - WATER MANHOLE
 - WELL
 - WETLANDS FLAG
 - MARCH
 - CONIFEROUS TREE
 - DECIDUOUS TREE
 - SHRUB
- EDGE OF TREES
--- SANITARY SEWER
--- STORM SEWER
--- WATERMAIN
--- MARKED GAS MAIN
--- MARKED ELECTRIC
--- OVERHEAD WIRE
--- BUREAU ELEC. SERV.
--- MARKED TELEPHONE
--- MARKED CABLE TV LINE
--- MARKED FIBER OPTIC



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THE UNDERGROUND UTILITY INFORMATION AS SHOWN HEREON IS BASED, IN PART, UPON INFORMATION FURNISHED BY UTILITY COMPANIES AND THE LOCAL MUNICIPALITY. WHILE THIS INFORMATION IS BELIEVED TO BE RELIABLE, ITS ACCURACY AND COMPLETENESS CANNOT BE GUARANTEED NOR CERTIFIED TO.



File No.: 200208 B.1.a2
DWG Date: 6-9-20
Rev Date: 11-10-20
Drawn By: BRF
Checked By (PM): TJO

D.2. Cap Maintenance Diagram
3123 South 9th Street
Sheboygan, Wisconsin

Figure
D.2.

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 VPI Corporation Property	BRRTS No. 02-60-001045
---	----------------------------------

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):

Roxanne.Chronert@wisconsin.gov

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?
06/19/2022	Trenton Ott	<input type="checkbox"/> monitoring well <input checked="" type="checkbox"/> cover/barrier <input type="checkbox"/> vapor mitigation system <input type="checkbox"/> other:	Cap in good condition.	None	<input type="radio"/> Y <input checked="" type="radio"/> N	<input checked="" type="radio"/> Y <input type="radio"/> N
		<input type="checkbox"/> monitoring well <input type="checkbox"/> cover/barrier <input type="checkbox"/> vapor mitigation system <input type="checkbox"/> other:			<input type="radio"/> Y <input type="radio"/> N	<input type="radio"/> Y <input type="radio"/> N
		<input type="checkbox"/> monitoring well <input type="checkbox"/> cover/barrier <input type="checkbox"/> vapor mitigation system <input type="checkbox"/> other:			<input type="radio"/> Y <input type="radio"/> N	<input type="radio"/> Y <input type="radio"/> N
		<input type="checkbox"/> monitoring well <input type="checkbox"/> cover/barrier <input type="checkbox"/> vapor mitigation system <input type="checkbox"/> other:			<input type="radio"/> Y <input type="radio"/> N	<input type="radio"/> Y <input type="radio"/> N
		<input type="checkbox"/> monitoring well <input type="checkbox"/> cover/barrier <input type="checkbox"/> vapor mitigation system <input type="checkbox"/> other:			<input type="radio"/> Y <input type="radio"/> N	<input type="radio"/> Y <input type="radio"/> N
		<input type="checkbox"/> monitoring well <input type="checkbox"/> cover/barrier <input type="checkbox"/> vapor mitigation system <input type="checkbox"/> other:			<input type="radio"/> Y <input type="radio"/> N	<input type="radio"/> Y <input type="radio"/> N

{Click to Add/Edit Image}

Date added: 08/03/2023



Title: Asphalt cap over former excavation area.

{Click to Add/Edit Image}

Date added: 08/03/2023



Title: Asphalt cap in front of shed building.

{Click to Add/Edit Image}

Date added: 08/03/2023



Title: Asphalt cap between plasticizer building and silos.

{Click to Add/Edit Image}

Date added: 08/03/2023



Title: Asphalt cap north of plasticizer building.

{Click to Add/Edit Image}

Date added: 08/03/2023



Title: Asphalt cap in place between plasticizer building and shed/silos.

Data Tables

Tables that follow are for reference only and were not included in the Department's closure documentation sent to affected parties

**Table A.3.
Residual Soil Contamination Table
VPI Property - 3123 South 9th Street
Sheboygan, Wisconsin**

Sample Location	Sampling Date	Fill or Native	PID (iu)	S/US	VOCS											SVOCS					
					Benzene (ppb)	cis-1,2-Dichloroethene (ppb)	Ethylbenzene (ppb)	Methyl tert-butyl ether (ppb)	Naphthalene (ppb)	Tetrachloroethene (ppb)	Toluene (ppb)	1,1,1-Trichloroethane (ppb)	Trichloroethene (ppb)	Combined Trimethylbenzenes (ppb)	Total Xylenes (ppb)	Bis-2-ethylhexyl phthalate (ppb)	Butyl Benzyl Phthalate (ppb)	Dinonyl Phthalate (ppb)	Phenol (ppb)	Diisononyl Phthalate (ppb)	
GP-9: 6-8 FT	1995	Native	NR	S	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	<u>[360,000]</u>	NR	NR	NR	NR
GP-9: 8-10 FT	1995	Native	NR	S	<61.0	<61.0	<61.0	NA	<300	<120	<61.0	<61.0	<61.0	<122	<180	NA	<u>[11,000]</u>	NR	NR	NR	NR
GP-18: 4-6 FT	1995	Native	NR	S	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	<u>[16,000]</u>	NR	NR	NR	NR
P-1: 3 FT	12/10/2019	Fill	<1.0	US	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	<u>[16,400,000]</u>	NA	NA	NA	NA
P-9: 2 FT	1/8/2020	Fill	<1.0	US	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	<u>[843,000]</u>	47.0	13,900	NA	26,000
P-9: 4 FT	1/8/2020	Fill	<1.0	US	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	<u>[7,750]</u>	NA	NA	NA	NA
P-10: 2 FT	1/8/2020	Fill	<1.0	US	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	<u>[1,680,000]</u>	3,450	<50	NA	41,200,000
P-10: 4 FT	1/8/2020	Native	<1.0	US	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	<u>[22,400,000]</u>	NA	NA	NA	NA
P-12: 6 FT	1/8/2020	Native	<1.0	S	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	<u>[6,020]</u>	NA	NA	NA	NA
P-27: 2-4 FT	5/6/2021	Fill	<1.0	US	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	<u>[196,000]</u>	<35.0	<45.0	<16.0	NA
<i>NR 720 Groundwater RCL</i>					5.1	41.2	1,570	27	658	4.5	1,107	140	3.6	1,379	3,960	2,880	NS	NS	2,000	NS	
<i>NR 720 Residential DC RCL</i>					1,600	156,000	8,020	63,800	5,520	33,000	818,000	640,000	1,300	219K/182K	260,000	38,800	286,000	NS	19,000	NS	
<i>NR 720 Industrial DC RCL</i>					7,070	2,340,000	35,400	282,000	24,100	145,000	818,000	640,000	8,410	219K/182K	260,000	164,000	1,210,000	NS	100,000	NS	

Note: Only the detected compounds are presented.

Note: NR 720 values are calculated utilizing the U.S. EPA's Regional Screening Level Web-Calculator per DNR draft document RR-890 (updated December 2017) .

Note: Concentrations that exceed their respective RCLs for the protection of groundwater are in *blue italics* .

Note: Concentrations that exceed their respective non-industrial RCLs for direct contact are underlined.

Note: Concentrations that exceed their respective industrial RCLs for direct contact are in [brackets].

Note "J" indicates estimated concentration above the level of detection but less than the level of quantification.

Table A.1. (Page 1 of 3)
Groundwater Analytical Results
VPI Property - 3123 South 9th Street
Sheboygan, Wisconsin

Sample Location	Sampling Date	Depth to Water (ft bgs)	VOCs								SVOCs					
			Benzene (ppb)	Chloro-methane (ppb)	1,1-Dichloro-ethane (ppb)	cis-1,2-Dichloro-ethene (ppb)	trans-1,2-Dichloro-ethene (ppb)	Toluene (ppb)	Vinyl Chloride (ppb)	Total Xylenes (ppb)	Bis(2Ethyl-hexyl)-phthalate (ppb)	Diethyl-phthalate (ppb)	Butyl Benzyl Phthalate (ppb)	Di-n-octyl Phthalate (ppb)	Phenol (ppb)	Di-isononyl Phthalate (ppb)
P-3	12/13/2019	NR	<0.25	<2.2	<0.27	<0.27	<1.10	0.48	<0.17	<0.73	NA	NA	NA	NA	NA	NA
P-4	12/13/2019	NR	<0.25	<2.2	<0.27	<0.27	<1.10	<0.17	<0.17	<0.73	NA	NA	NA	NA	NA	NA
P-5	12/13/2019	NR	0.25	2.40	<0.27	<0.27	<1.10	0.42	<0.17	<0.73	NA	NA	NA	NA	NA	NA
P-6	12/13/2019	NR	<0.25	2.70	<0.27	<0.27	<1.10	<0.17	<0.17	<0.73	NA	NA	NA	NA	NA	NA
P-7	12/13/2019	NR	<0.25	<2.2	<0.27	<0.27	<1.10	<0.17	<0.17	<0.73	NA	NA	NA	NA	NA	NA
P-8	12/13/2019	NR	<0.25	<2.2	<0.27	<0.27	<1.10	0.36	<0.17	<0.73	NA	NA	NA	NA	NA	NA
P-9	1/17/2020	NR	<0.25	<2.2	<0.27	37.1	2.40	0.27	1.90	<0.73	149	<1.7	<2.9	NA	NA	NA
P-1	12/13/2019	NR	0.25	<2.2	<0.27	5.40	<1.10	0.30 J	0.78 J	<0.73	NA	NA	NA	NA	NA	NA
MW-1	1/17/2020	3.04	<0.25	<2.2	<0.27	<0.27	<1.10	<0.17	0.67	<0.73	14.7	<0.79	59.6	NA	NA	NA
	10/27/2020	2.88	<0.25	<2.2	<0.27	10.20	0.73	<0.17	0.60 J	<0.73	7.60	1.13 J	<0.96	<0.76	1.13 J	NA
	2/2/2021	2.89	<0.25	<2.2	<0.27	9.30	0.47 J	<0.17	0.93	<0.73	8.70	1.26 J	<0.96	<0.76	1.01 J	NA
	5/11/2021	NM	NA	NA	NA	NA	NA	NA	NA	NA	16.6	1.13 J	<1.33	<1.24	<0.69	NA
	8/13/2021	3.18	NA	NA	NA	NA	NA	NA	NA	NA	<1.30	<0.76	<1.33	<1.24	<0.69	NA
	4/12/2022	2.48	<0.30	<0.74	<0.43	0.90 J	<0.50	0.48 J	0.32 J	<1.01	5.40	2.47 J	<1.28	95.7	<0.46	NA
	6/9/2022	NM	<0.30	<0.74	<0.43	2.54	<0.50	<0.33	0.86	<1.01	2.22 J	<0.73	<1.28	<1.24	<0.46	NA
Well Abandoned																
P-13/MW-2	4/2/2020	3.59	<0.33	<0.8	<0.46	<0.39	<0.37	0.57 J	<0.20	<1.48	<1.61	1.16 J	<0.96	<0.76	<0.68	NA
Well Abandoned																
P-14/MW-3	4/2/2020	4.12	<0.33	<0.8	<0.46	<0.39	<0.37	0.35 J	<0.20	<1.48	<1.61	1.12 J	<0.96	<0.76	<0.68	NA
	10/27/2020	4.23	NA	NA	NA	NA	NA	NA	NA	NA	<1.61	3.50 J	<0.96	3.50 J	2.06 J	NA
Well Abandoned																
P-15/MW-4	4/2/2020	5.91	<0.33	<0.8	<0.46	<0.39	<0.37	0.37 J	<0.20	<1.48	<1.61	3.50 J	<0.96	<0.76	<0.68	NA
	10/27/2020	6.14	NA	NA	NA	NA	NA	NA	NA	NA	<1.61	2.28 J	<0.96	<0.76	1.54 J	NA
	2/2/2021	6.18	NA	NA	NA	NA	NA	NA	NA	NA	<1.61	1.75 J	<0.96	<0.76	1.21 J	NA
	5/11/2021	4.59	NA	NA	NA	NA	NA	NA	NA	NA	1.44 J	1.11 J	<1.33	<1.24	<0.69	NA
	8/13/2021	5.55	NA	NA	NA	NA	NA	NA	NA	NA	4.70 J	<0.76	<1.33	<1.24	<0.69	NA
	4/12/2022	2.05	NA	NA	NA	NA	NA	NA	NA	NA	2.38 J	1.51 J	<1.28	<1.24	<0.46	NA
	7/14/2022	6.61	NA	NA	NA	NA	NA	NA	NA	NA	<1.37	<0.73	<1.28	<1.24	<0.46	NA
9/29/2022	6.23	NA	NA	NA	NA	NA	NA	NA	NA	2.43 J	<0.73	<1.28	<1.24	0.46 J	NA	
NR 140 Groundwater ES	-	-	5.0	30.0	850	70	100	800	0.2	2,000	6	NS	NS	NS	NS	NS
NR 140 Groundwater PAL	-	-	0.5	3	85	7.0	20	160	0.02	400	0.6	NS	NS	NS	NS	NS

Note: Only the detected compounds are presented.
Note: "J" indicates slight detection above the level of detection but less than the level of quantification.
Note: Concentrations in **blue italics** exceed their respective NR 140 preventive action limits (PALs).
Note: Concentrations in **red bold** exceed their respective NR 140 enforcement standards (ESs).
Note: NA means not analyzed during that sampling period

Table A.1. (Page 2 of 3)
 Groundwater Analytical Results
 VPI Property - 3123 South 9th Street
 Sheboygan, Wisconsin

Sample Location	Sampling Date	Depth to Water (ft bgs)	VOCs								SVOCs					
			Benzene (ppb)	Chloro-methane (ppb)	1,1-Dichloro-ethane (ppb)	cis-1,2-Dichloro-ethene (ppb)	trans-1,2-Dichloro-ethene (ppb)	Toluene (ppb)	Vinyl Chloride (ppb)	Total Xylenes (ppb)	Bis(2Ethyl-hexyl)-phthalate (ppb)	Diethyl-phthalate (ppb)	Butyl Benzyl Phthalate (ppb)	Di-n-octyl Phthalate (ppb)	Phenol (ppb)	Di-isononyl Phthalate (ppb)
P-16/MW-5	4/2/2020	5.93	<0.33	<0.8	<0.46	<0.39	<0.37	0.41 J	<0.20	<1.48	34.0	1.19 J	<0.96	<0.76	<0.68	NA
	10/27/2020	6.19	NA	NA	NA	NA	NA	NA	NA	NA	5.10 J	4.00	<0.96	<0.76	2.15 J	NA
	2/2/2021	6.17	NA	NA	NA	NA	NA	NA	NA	NA	12.8	2.44 J	<0.96	<0.76	1.01 J	NA
	5/11/2021	4.37	NA	NA	NA	NA	NA	NA	NA	NA	13.2	<0.76	<1.33	<1.24	<0.69	NA
	8/13/2021	3.94	NA	NA	NA	NA	NA	NA	NA	NA	10.0	<0.76	<1.33	<1.24	<0.69	NA
	4/12/2022	4.03	NA	NA	NA	NA	NA	NA	NA	NA	14.6	1.42 J	<1.28	<1.24	<0.46	NA
	7/25/2022	6.56	NA	NA	NA	NA	NA	NA	NA	NA	9.90	<0.73	<1.28	<1.24	<0.46	NA
	9/29/2022	4.07	NA	NA	NA	NA	NA	NA	NA	NA	2.70 J	<0.73	<1.28	<1.24	2.71	NA
HA-1/MW-6	4/2/2020	NM	NR	NR	NR	NR	NR	NR	NR	NR	8.40 J	<3.36	<2.88	<2.28	<2.04	NA
	5/4/2020	3.43	NR	NR	NR	NR	NR	NR	NR	NR	<1.61	1.26 J	<2.88	<2.28	<2.04	NA
	10/27/2020	3.43	NA	NA	NA	NA	NA	NA	NA	NA	<1.61	2.87 J	<0.96	<0.76	2.12 J	NA
	2/2/2021	3.55	NA	NA	NA	NA	NA	NA	NA	NA	<1.61	1.70 J	<0.96	<0.76	1.42 J	NA
	5/11/2021	2.56	NA	NA	NA	NA	NA	NA	NA	NA	<1.30	1.07 J	<1.33	<1.24	<0.69	NA
	8/13/2021	2.34	NA	NA	NA	NA	NA	NA	NA	NA	1.88 J	<0.76	<1.33	<1.24	<0.69	NA
	4/12/2022	1.38	NA	NA	NA	NA	NA	NA	NA	NA	3.90 J	1.31 J	<1.28	<1.24	<0.46	NA
	7/14/2022	5.93	NA	NA	NA	NA	NA	NA	NA	NA	<1.37	<0.73	<1.28	<1.24	<0.46	NA
9/29/2022	2.65	NA	NA	NA	NA	NA	NA	NA	NA	<1.37	<0.73	<1.28	<1.24	0.49 J	NA	
P-17/MW-7	10/28/2020	6.14	<0.33	<0.8	<0.46	<0.39	<0.37	<0.36	<0.20	<1.48	<1.61	3.13 J	<0.96	<0.76	1.99 J	NA
	5/11/2021	5.10	NA	NA	NA	NA	NA	NA	NA	NA	1.82 J	0.79 J	<1.33	<1.24	<0.69	NA
	8/13/2021	5.42	NA	NA	NA	NA	NA	NA	NA	NA	1.68 J	<0.76	<1.33	<1.24	<0.69	NA
	4/12/2022	4.34	NA	NA	NA	NA	NA	NA	NA	NA	1.87 J	2.10 J	<1.28	2.67 J	<0.46	NA
	7/14/2022	7.78	NA	NA	NA	NA	NA	NA	NA	NA	<1.37	<0.73	<1.28	<1.24	<0.46	NA
	9/29/2022	6.59	NA	NA	NA	NA	NA	NA	NA	NA	<1.37	<0.73	<1.28	<1.24	14.4	NA
P-12	1/17/2020	NR	<0.25	<2.2	<0.27	3.40	<10.9	<0.17	0.18	<0.73	73.3	1.80	<1.30	NA	NA	NA
P-21/MW-8	10/28/2020	5.10	<0.33	<0.8	<0.46	<0.39	<0.37	<0.36	<0.20	<1.48	<1.61	2.93 J	<0.96	<0.76	2.12 J	NA
	2/2/2021	5.37	NA	NA	NA	NA	NA	NA	NA	NA	<1.61	2.79 J	<0.96	<0.76	1.94 J	NA
	5/11/2021	NM	NA	NA	NA	NA	NA	NA	NA	NA	20.4	1.97 J	<1.33	<1.24	<0.69	NA
	8/13/2021	4.03	NA	NA	NA	NA	NA	NA	NA	NA	<1.30	<0.76	<1.33	<1.24	<0.69	NA
	4/12/2022	2.53	NA	NA	NA	NA	NA	NA	NA	NA	1.98 J	1.69 J	<1.28	<1.24	<0.46	NA
	6/9/2022	NM	NA	NA	NA	NA	NA	NA	NA	NA	<1.37	<0.73	<1.28	<1.24	<0.46	NA
Well Abandoned																
NR 140 Groundwater ES	-	-	5.0	30.0	850	70	100	800	0.2	2,000	6	NS	NS	NS	NS	NS
NR 140 Groundwater PAL	-	-	0.5	3	85	7.0	20	160	0.02	400	0.6	NS	NS	NS	NS	NS

Note: Only the detected compounds are presented.
 Note: "J" indicates slight detection above the level of detection but less than the level of quantification.
 Note: Concentrations in **blue italics** exceed their respective NR 140 preventive action limits (PALs).
 Note: Concentrations in **red bold** exceed their respective NR 140 enforcement standards (ESs).
 Note: NA means not analyzed during that sampling period

Table A.1. (Page 3 of 3)
 Groundwater Analytical Results
 VPI Property - 3123 South 9th Street
 Sheboygan, Wisconsin

Sample Location	Sampling Date	Depth to Water (ft bgs)	VOCs								SVOCs					
			Benzene (ppb)	Chloro-methane (ppb)	1,1-Dichloro-ethane (ppb)	cis-1,2-Dichloro-ethene (ppb)	trans-1,2-Dichloro-ethene (ppb)	Toluene (ppb)	Vinyl Chloride (ppb)	Total Xylenes (ppb)	Bis(2Ethyl-hexyl)-phthalate (ppb)	Diethyl-phthalate (ppb)	Butyl Benzyl Phthalate (ppb)	Di-n-octyl Phthalate (ppb)	Phenol (ppb)	Di-isononyl Phthalate (ppb)
P-22/MW-9	10/28/2020	2.30	<0.33	<0.8	<0.46	<0.39	<0.37	<0.36	<0.20	<1.48	46.0	2.50 J	<0.96	<0.76	1.95 J	NA
	2/2/2021	2.80	NA	NA	NA	NA	NA	NA	NA	NA	5.50	2.24 J	<0.96	<0.76	1.72 J	NA
	5/11/2021	NM	NA	NA	NA	NA	NA	NA	NA	NA	12.2	<0.76	<1.33	<1.24	<0.69	NA
	8/13/2021	3.79	NA	NA	NA	NA	NA	NA	NA	NA	1.76 J	<0.76	<1.33	<1.24	<0.69	NA
	4/12/2022	3.40	NA	NA	NA	NA	NA	NA	NA	NA	8.00	1.49 J	<1.28	<1.24	<0.46	NA
	6/9/2022	NM	NA	NA	NA	NA	NA	NA	NA	NA	2.93 J	<0.73	<1.28	<1.24	0.56 J	NA
Well Abandoned																
P-2	12/13/2019	NR	<0.25	<2.2	<0.27	10.6	<1.10	0.26	<0.17	<0.73	NA	NA	NA	NA	NA	NA
P-24/MW-10	10/28/2020	NM	<0.33	<0.8	<0.46	<0.39	<0.37	<0.36	<0.20	<1.48	NA	NA	NA	NA	NA	NA
	2/2/2021	NM	<0.33	<0.8	<0.46	<0.39	<0.37	<0.36	<0.20	<1.48	NA	NA	NA	NA	NA	NA
Well Abandoned																
P-11	1/17/2020	NR	<2.5	<21.9	<2.7	<2.7	<1.10	<1.7	<1.7	<7.30	2,940,000	<64,000	<108,000	NA	NA	NA
P-25/MW-11	11/5/2020	NM	NA	NA	NA	NA	NA	NA	NA	NA	532,000	<11.2	110.0	<7,600	5.50 J	NA
	2/2/2021	NM	NA	NA	NA	NA	NA	NA	NA	NA	30,000	1.90 J	<1.30	1,070	2.11 J	NA
	5/11/2021	NM	NA	NA	NA	NA	NA	NA	NA	NA	9,200	1.08 J	<1.33	<1.24	<0.69	NA
	8/13/2021	NM	NA	NA	NA	NA	NA	NA	NA	NA	2,930	<760	<1,330	<1,240	<690	NA
	4/12/2022	1.73	NA	NA	NA	NA	NA	NA	NA	NA	13,000	<14.6	<25.6	<2,480	<9.20	NA
	6/9/2022	NM	NA	NA	NA	NA	NA	NA	NA	NA	17,600 J	<3,650	<6,400	<6,200	<2,300	NA
Well Abandoned																
P-10	1/17/2020	NR	0.26	<2.2	0.38	4.40	<1.10	<0.17	0.56	0.53	5,350	<91.2	<153	NA	NA	NA
P-26/MW-12	5/11/2021	NM	NA	NA	NA	NA	NA	NA	NA	NA	115	2.42 J	<1.33	<1.24	0.74 J	NA
	8/13/2021	NM	NA	NA	NA	NA	NA	NA	NA	NA	2,470	<760	<1,330	<1,240	<690	NA
	4/12/2022	NM	<0.30	<0.74	<0.43	2.03	<0.50	0.34 J	0.39 J	<1.01	751	3.40	<1.28	<1.24	<0.46	NA
	6/9/2022	NM	<0.30	<0.74	<0.43	1.14 J	<0.50	4.00	0.28 J	<1.01	1,420	<146	<256	<248	<92.0	NA
Well Abandoned																
P-29/MW-13	5/11/2021	NM	NA	NA	NA	NA	NA	NA	NA	NA	3,700	<0.76	<1.33	<1.24	<0.69	NA
	8/13/2021	NM	NA	NA	NA	NA	NA	NA	NA	NA	2,230	<760	<1,330	<1,240	<690	NA
	4/12/2022	2.22	NA	NA	NA	NA	NA	NA	NA	NA	2,272	1.79 J	<1.28	<248	<0.46	NA
	7/14/2022	4.90	NA	NA	NA	NA	NA	NA	NA	NA	54.0	<7.30	<12.8	<12.4	<4.60	NA
	9/29/2022	4.78	NA	NA	NA	NA	NA	NA	NA	NA	2,990	<73.0	<128	<124	<46.0	NA
P-31/MW-14	5/11/2021	3.79	NA	NA	NA	NA	NA	NA	NA	NA	3.80 J	1.06 J	<1.33	4.30 J	<0.69	NA
	8/13/2021	5.36	NA	NA	NA	NA	NA	NA	NA	NA	1.65 J	<0.76	<1.33	<1.24	<0.69	NA
	4/12/2022	4.35	NA	NA	NA	NA	NA	NA	NA	NA	3.30 J	1.75 J	<1.28	<1.24	<0.46	NA
	7/14/2022	6.54	NA	NA	NA	NA	NA	NA	NA	NA	<1.37	<0.73	<1.28	<1.24	<0.46	NA
	9/29/2022	5.51	NA	NA	NA	NA	NA	NA	NA	NA	<1.37	<0.73	<1.28	<1.24	0.64 J	NA
NR 140 Groundwater ES	-	-	5.0	30.0	850	70	100	800	0.2	2,000	6	NS	NS	NS	NS	NS
NR 140 Groundwater PAL	-	-	0.5	3	85	7.0	20	160	0.02	400	0.6	NS	NS	NS	NS	NS

Note: Only the detected compounds are presented.
 Note: "J" indicates slight detection above the level of detection but less than the level of quantification.
 Note: Concentrations in **blue italics** exceed their respective NR 140 preventive action limits (PALs).
 Note: Concentrations in **red bold** exceed their respective NR 140 enforcement standards (ESs).
 Note: NA means not analyzed during that sampling period

Friess Environmental Consulting, Inc.
Guide to Abbreviations
in Laboratory Data Tables

< = Less than the specified detection limit.

DO = Dissolved Oxygen

ES = Enforcement Standard

DRO = Diesel range organics

GRO = Gasoline range organics

iu = instrument units

MTBE = Methyl-tert butyl ether

mV = Millivolts

NA = Not analyzed for indicated parameter

NM = Not measured for indicated parameter

NR = No recovery or not reported at this interval.

NR 140 ES = Wisconsin Administrative Code NR 140 Groundwater Quality
Enforcement Standard

NR 140 PAL = Wisconsin Administrative Code NR 140 Groundwater Quality
Preventive Action Limit

NR 720 Groundwater RCL = Wisconsin Administrative Code NR 720 Residual Contaminant Level for the protection of groundwater
via the U.S. EPA's Regional Screening Level Web-Calculator per DNR draft document RR-890

NR 720 Non-Industrial DC RCL = Wisconsin Administrative Code NR 720 Non-Industrial Residual Contaminant Level for direct contact
via the U.S. EPA's Regional Screening Level Web-Calculator per DNR draft document RR-890

Note: NR 720 values are calculated utilizing the U.S. EPA's Regional Screening Level Web-Calculator per DNR draft document RR-890.

NS = No NR 140 ES/PAL or NR 720 RCL standard has been established.

ORP = Oxidation-reduction potential

PAL = Preventive Action Limit

PID = Photoionization detector

ppb = parts per billion

ppm = parts per million

RCL = Residual contaminant level as established in WAC Chapter NR 720

S/US = Saturated/Unsaturated soil sample interval

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

umhos = Micromhos