

Mr. Kevin McKnight
Remediation and Redevelopment Program
Wisconsin Department of Natural Resources
625 E CTY Y, Suite 700
Oshkosh, WI 54901-9731

**NR 716 SITE INVESTIGATION WORK PLAN AND RESPONSE TO WDNR COMMENTS
FORMER MIRRO PLANT NO. 20 SITE, 44 WALNUT STREET, CHILTON, WISCONSIN
BRRTS NOS. 02-08-520157 (ERP) AND 06-08-426946 (VPLE)**

Dear Mr. McKnight:

Ramboll US Consulting, Inc. (Ramboll), on behalf of Newell Operating Company (NOC), is submitting the attached Site Investigation Work Plan ("Work Plan") to conduct additional investigation activities at the former Mirro Plant No. 20 facility located at 44 Walnut Street in Chilton, Wisconsin (the "facility" or "site"). The objective of this Work Plan is to supplement investigation work done by others at the site on behalf of NOC or other interested parties and to address the comments provided by the Wisconsin Department of Natural Resources (WDNR) in their October 7, 2020 letter "Site Investigation Review for VPLE – Not Approved."

March 15, 2021

Ramboll
234 W. Florida Street
Fifth Floor
Milwaukee, WI 53204
USA

T +1 414 837 3607
F +1 414 837 3608
www.ramboll.com

NOC's responses to WDNR's comments are provided below and are based on our current understanding of site conditions. It is NOC's understanding that completion of the work being requested by the WDNR will allow the site to obtain a Certificate of Completion under the Voluntary Party Liability Exemption (VPLE) program.

Ref. 1690019558

WDNR Comment 1

The property boundaries need to be confirmed and site figures updated.

- *It appears that well nests MW-5/PZ-5 and MW-9/PZ-9 are located on neighboring properties. Additionally, sample locations B-1 to B-3 and SB-1 and SB-2 appear to be located on neighboring properties.*
- *It appears that the area between the former Mirro Plt #20 building and the railroad is not part of the former Mirro Plt #20 property.*
- *The creation of a certified survey map of the parcel including monitoring well locations is recommended.*
- *Responsible Party (RP) letters may need to be issued to neighboring property owners for the contamination identified on their property.*

NOC Response

Ramboll, on behalf of NOC, retained a licensed land surveyor to determine the property boundaries based on the legal description provided on the property deed obtained from the Calumet County Register of Deeds. The survey work was completed in December 2020 and a copy of the certified survey map is provided as Appendix G of the attached Work Plan. The property boundaries were confirmed to be consistent with how they were previously portrayed on figures prepared by NOC's

prior environmental consultant, Short Elliott Hendrickson Inc. (SEH). The property boundaries shown on the Calumet County GIS site, and subsequently shown on figures included in the Stantec's August 11, 2020 *Focused Phase II Environmental Assessment* report are inconsistent with the boundaries described on the property deed.

Based on the recent survey, existing monitoring well nest MW-5/PZ-5 are confirmed to be located on site. Well nest MW-9/PZ-9 and borings SB-1, SB-2, B-1, B-2, and B-3 are located on the bordering property to the south which includes the city/railroad right of way. Prior reports prepared on NOC's behalf similarly referenced that these soil boring and well locations were off site.

WDNR Comment 2

Additional soil sampling is necessary to define the degree and extent of soil contamination on-site. Soil sampling performed by Stantec in 2020 identified contamination on the undeveloped northern portion of the site. A soil sampling plan to fill in sampling gaps to the north and south of the building is needed for contaminants of concern. This work is partly dependent on the property boundaries determination.

NOC Response

Based on a review of available soil sample analytical results, additional sampling is proposed to further delineate the extent of soil impacts in four discrete areas on site. The additional soil investigation areas included in the Work Plan focus on those locations where previously reported concentrations exceed the current Wisconsin Administrative Code (WAC) NR 720 industrial and/or non-industrial direct contact Residual Contaminant Levels (RCLs) and are not fully delineated. These four discrete areas include the following:

- Trichloroethene (TCE) was detected in soil sample PZ-10 (2-4) at a concentration of 2.6 milligrams per kilogram (mg/kg), which is above the non-industrial direct contact RCL (1.3 mg/kg), but below the industrial direct contact RCL (8.41 mg/kg). This represents the only detection of TCE in the roughly 40 soil samples collected to date on site. The measured depth to groundwater at the MW-10/PZ-10 well nest has ranged from approximately 2 to 4 feet below ground surface (bgs), so it is possible that the soil sample collected at PZ-10 (2-4) represents a saturated soil sample. TCE has not been detected in any of the groundwater samples collected to date from MW-10 or PZ-10. The Work Plan includes confirmation and delineation of TCE at this location, if confirmed.
- Benzo(a)Pyrene [B(a)P] was detected in soil sample MW-4 (2-8) at a concentration of 17 mg/kg, which exceeds the industrial direct contact RCL of 2.11 mg/kg. Benzo(b)fluoranthene and pyrene were also reported in soil sample MW-4 (2-8) at concentrations above the non-industrial direct contact RCL. The Work Plan includes collection of an unsaturated soil sample from the direct contact interval (0 to 4 feet bgs) adjacent to the former MW-4 sample location. Three additional borings are proposed around this location to delineate the identified impacts.
- B(a)P was detected in soil sample MW-7 (0-4) at a concentration of 0.815 mg/kg which exceeds the non-industrial direct contact RCL (0.115 mg/kg), but below the industrial direct contact RCL (2.11 mg/kg). B(a)P is delineated to the south, east and west by surrounding sample locations (SB-7, B-9, MW-6, and PZ-10). One additional boring is proposed to define the unsaturated soil impacts to the north.

The referenced Stantec 2020 soil sampling included collection of four shallow fill soil samples (PP-1 to PP-4) in the undeveloped northern portion of the site. The soil samples were submitted for analysis of volatile organic compounds (VOCs) and Resource Conservation and Recovery Act (RCRA) metals. No VOC compounds were detected above laboratory detection limits in the samples collected. Lead was the only

RCRA metal detected in the soil samples at concentration above the WDNR established Background Threshold Value (BTV) and/or WAC NR 720 RCL. The concentration of lead in soil ranged from 45 to 80 mg/kg, which exceeds the groundwater pathway RCL of 27 mg/kg, but is well below the non-industrial direct contact RCL of 400 mg/kg. Samples PP-1 through PP-3 reported concentrations of lead above the BTV of 51.6 mg/kg. These detected concentrations of lead appear consistent with potential fill soil and do not appear to represent a site related release. No additional soil sampling is proposed; however, a shallow monitoring well is proposed in this area to confirm that these slightly elevated metals impacts in fill soil are not adversely impacting shallow groundwater because the detected concentrations were above the established BTV and groundwater pathway RCL.

Based on the results of the recent site survey, it was confirmed that soil samples collected south of the existing site building are off-site and located within city/railroad right of way. While NOC acknowledges that the following off-site soil detections are above the non-industrial direct contact RCLs, further delineation is not proposed as they appear unrelated to NOC's former operations at the site.

- TCE was detected in off-site fill soil sample PZ-9 (4-6) at a concentration of 1.5 mg/kg, which is slightly above the non-industrial direct contact RCL (1.3 mg/kg), but well below the industrial direct contact RCL (8.41 mg/kg). Based on the sample depth, this detection does not represent a direct contact exceedance. Other than the previously referenced on-site detection of TCE in soil sample PZ-10 (2-4) this is the only other detection of TCE in the roughly 40 soil samples collected both on and off-site during the site investigation activities conducted to date. TCE was not detected in off-site soil sample SB-1 (0-4) collected in 2002 closer to the on-site building or MW-9 (0-4) collected in 2006 within 5 feet from PZ-9 (4-6) collected in 2008. Additionally, TCE has not been detected in groundwater samples collected in monitoring well MW-9 since monitoring activities were initiated at this location in 2006, including most recently in 2020. As such, further soil sampling in this area is not warranted.
- Arsenic was detected in off-site fill soil samples B-2 (0-2) and B-3 (0-2), collected adjacent to the railroad tracks, at concentrations of 42.6 mg/kg and 28.1 mg/kg, respectively, which are above the BTV of 8.3 mg/kg. Concentrations of arsenic in nearby soil samples (SB-2 and SB-3) collected near the property boundary were below the BTV. Based on the investigation activities conducted to date, these off-site elevated arsenic levels appear unrelated to NOCs historic operations at the site. As such, further soil sampling in this area is not warranted.

As referenced in the Work Plan, Ramboll is in the process of obtaining copies of available historic reports, including the laboratory analytical reports. Once received, Ramboll will prepare updated data tables that compare the historic data to the current regulatory standards. Should the result of this effort identify other on-site direct contact exceedances, additional sampling may be performed, if necessary. The WDNR will be notified regarding any significant changes to the scope of work presented in the Work Plan.

WDNR Comment 3

PCBs were detected in soil at B-10 above groundwater pathway RCL. Clarify why sample was collected and identify source(s). Additional sampling should be evaluated.

NOC Response

Boring B-10 was advanced through the basement floor in an area that was referred to in the *Site Investigation Report* (SEH, 2006) as the "transformer room." This work was completed as part of the investigation effort to assess potential areas of concern and based on discussions with the WDNR. One soil sample was collected from B-10 at a depth of 0.5 to 1.5 feet below the basement floor. One polychlorinated

biphenyl (PCB) arochlor (Arochlor 1254) was detected at a concentration of 0.018 mg/kg, which is well below the non-industrial direct contact RCL of 0.239 mg/kg, but above the groundwater pathway RCL of 0.0094 mg/kg.

Due to groundwater potentially being in direct contact with the basement floor during sample collection, the Work Plan includes collection of a groundwater sample from B-9 located approximately 25 feet north/downgradient of the former B-10 sample location to determine if this slight exceedance of the groundwater pathway RCL for PCBs in soil has adversely impacted groundwater.

WDNR Comment 4

Additional groundwater monitoring well locations are needed to define the degree and extent of contamination.

- *A piezometer north of PZ-10.*
- *A piezometer side gradient (east) of PZ-5.*
- *A groundwater monitoring well and piezometer side gradient (east) of MW-8 near property line.*

NOC Response

The Work Plan includes installation of the groundwater monitoring wells and piezometers located north of PZ-10 (proposed well nest MW-12/PZ-12) and side gradient (east) of MW-8 (proposed well nest MW-13/PZ-13). Ramboll does not recommend installation of an off-site piezometer side gradient (east) of PZ-5 at this time. While Ramboll acknowledges the presence of VOC detections in MW-5 and PZ-5; these VOC detections are greater at depth and, based on the review of historic reports, have migrated from an off-site source and are unrelated to NOC's former operations at the site. In addition, the *Groundwater Investigation for Chlorinated Solvent Contamination* report commissioned by the WDNR completed by OMNI in 2015 strengthens this argument based on the conclusions and developed cross-sections. Select portions of the OMNI report are provided as Appendix C and historic groundwater flow maps are provided as Appendix D, both in the attached Work Plan.

Moreover, a standalone Off-Site Liability Exemption Request will be prepared on behalf of NOC to address the groundwater impacts migrating onto the site from off-site source(s). This request is further discussed in the response to WDNR Comment 5.

WDNR Comment 5

A standalone off-site exemption request for chlorinated volatile organic compounds (CVOCs) in groundwater will be required. This request is contingent on select piezometers being on the former Mirro #20 property. An offsite exemption requires showing contaminant impact on property owned by requester. Assumed contamination is not eligible for an exemption.

NOC Response

A standalone Off-Site Liability Exemption Request will be prepared on behalf of NOC. The request will clearly demonstrate that CVOCs identified in on-site monitoring wells/piezometers are associated with off-site source(s).

WDNR Comment 6

The perfluoroalkyl and polyfluoroalkyl substances (PFAS) investigation is not complete. Additional information regarding site plating process and use of PFAS is needed.

NOC Response

To date, Ramboll has not been able to locate historic records regarding the plating process and/or use of PFAS on site. We are continuing to attempt to obtain historic records. Historic records, if available, will be reviewed in an attempt to gather the additional information specifically requested by the WDNR regarding site plating processes and use of PFAS on site. In addition, other potential sources of PFAS within the building will be evaluated which may be influencing PFAS concentrations detected within the sump water. The results of this research effort will be documented in a future submittal to the WDNR.

WDNR Comment 7

A sediment investigation in the Manitowoc River is warranted for contaminants of concern based on sludge sample results collected from the wastewater/sump system which discharges to the river.

NOC Response

While the "sludge" sample results presented in the 2020 Stantec Phase II report documented the presence of elevated concentrations of select compounds, there is currently no specific information to confirm that these materials have been discharged to the Manitowoc River. Additionally, none of the constituents detected in the sump water samples collected by Stantec are above current WAC NR105 surface water quality criteria. As such, a sediment investigation in the south branch of the Manitowoc River is not proposed at this time. The Work Plan includes collection of trench solids samples near the point of entry to each of the sumps to further evaluate the quality of the solids present within the subfloor drainage system. This data along with information gathered during the proposed assessment of the basement subfloor drainage system (see response to WDNR Comment 9) will be used to determine the need for further testing or additional actions.

WDNR Comment 8

A surface water investigation/evaluation is warranted for contaminants of concern based on site investigation data. There is a likelihood of a PFAS discharge to the Manitowoc River via groundwater and the sump system.

NOC Response

Water samples have been collected of the sump water periodically throughout the site investigation activities (2006 to 2013) and most recently by Stantec in June of 2020. As previously referenced, there were no reported exceedances of current WAC NR 105 surface water quality criteria in the sump water samples collected by Stantec in 2020. While PFAS was detected in the sump water samples, there is no current or proposed regulatory surface water standard available in Wisconsin by which to compare these results. Additionally, the PFAS results for the sample collected from the west sump were generally inconsistent with PFAS results from the other two sumps and groundwater samples from nearby monitoring wells, therefore confirmation sampling appears to be warranted. The Work Plan includes collection of water samples from the three basement sumps to confirm the initial results. This information, along with data gathered regarding potential on-site sources of these impacts (WDNR Comment 6), will be used to determine the need for further testing or additional actions.

WDNR Comment 9

The identified sludge in the wastewater/sump system requires immediate attention due to potential surface water discharge. The sludge should be removed, and the wastewater/sump system evaluated and modified to minimize the sludge/groundwater contaminant discharge.

NOC Response

As referenced in responses to WDNR Comments 7 and 8, there is no evidence that the “sludge” has been discharged to the Manitowoc River or the water within the sumps that discharges to the River exceeds current WAC NR 105 surface water quality criteria. As such, an immediate removal action is not proposed at this time. The Work Plan includes an evaluation of the basement subfloor drainage system and further assessment of the solids (“sludge”) identified within the basement to determine the extent and potential source of these materials. This will include mapping of the trench system and conveyance piping, evaluation of current operating conditions, and quantification of trench solids volumes, types and locations. This information, along with the sampling results (WDNR Comment 7 and 8) will be used to determine the need for further testing or additional actions.

WDNR Comment 10

A vapor intrusion investigation is required.

NOC Response

Due to shallow groundwater under the building basement floor, the collection of sub-slab vapor samples through the basement floor is potentially technically impractical. As a result, Section 5.4.4 of the Work Plan includes the collection of indoor air samples from the basement (e.g., sump areas). In addition, an inventory of the existing basement contents and conditions will be completed to identify items or floor conditions that could potentially interfere with indoor air sampling activities. Any identified items or conditions will be discussed and addressed prior to initiating indoor air sampling activities.

WDNR Comment 11

Tables need to be updated with current industrial, non-industrial and groundwater protection residual contaminant levels (RCLs) and groundwater standards.

NOC Response

Ramboll is in the process of obtaining copies of available historic reports, including the laboratory analytical reports. Once received, Ramboll will prepare updated data tables that compare the historic data to the current regulatory standards. The updated tables will be included in the *Site Investigation Report*.

WDNR Comment 12

Location of former transformer pad(s) and sample locations should be added to site figures.

NOC Response

The transformer pad location has been added to Work Plan Figure 2. As described in the *Additional Site Investigation Report* (SEH, 2008), two soil samples were collected in 2008 adjacent to the transformer pad located outside the western wall of the facility building. The samples were collected at the southeast corner of the concrete slab adjacent to where staining was observed. The approximate sample location, based in this description, has also been include on Work Plan Figure 3.

WDNR Comment 13

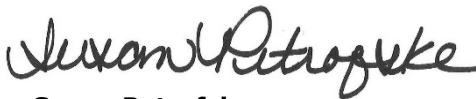
The data provided in the two Stantec reports should be added to future submittals.

NOC Response

Soil and groundwater analytical results obtained during the Stantec 2020 site investigation activities will be incorporated into the *Site Investigation Report* tables and figures, as appropriate.

Please let us know if you have any questions regarding the above provided responses or the attached Work Plan. We appreciate your continued assistance in achieving regulatory case closure under the VPLE program.

Yours sincerely,



Susan Petrofske
Managing Consultant

D 262 901 3501
spetrofske@ramboll.com



Jeanne M. Tarvin, PG, CPG
Managing Principal

D 262 901 0085
jtarvin@ramboll.com

cc: Kristin Jones, Newell (electronic copy)
Hudson Green, Patriot (electronic copy)

Enclosure

NR 716 Site Investigation Work Plan

NR 716 SITE INVESTIGATION WORK PLAN

**MIRRO PLANT NO. 20 (FORMER)
44 WALNUT STREET
CHILTON, WISCONSIN**

**BRRTS NO. 06-08-426946 (VPLE)
BRRTS NO. 02-08-520157(ERP)
FID NO. 408021130**

Intended for:

**Wisconsin Department of Natural Resources
Oshkosh, Wisconsin**

Prepared for:

Newell Operating Company

Prepared by:

**Ramboll US Consulting, Inc.
Milwaukee, Wisconsin**

Date:

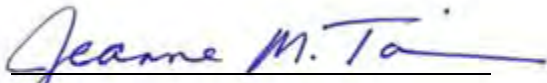
March 15, 2021

Project Number:

1690019558

CERTIFICATION

I, Jeanne M. Tarvin, 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

March 15, 2021
Date

Title: Managing Principal
License Number 307-13

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Ramboll US Consulting, Inc.
234 W. Florida Street
Fifth Floor
Milwaukee, WI 53204
USA
T +1 414 837 3607
F +1 414 837 3608
www.ramboll.com

TABLES

Table 1: Sampling and Analysis Plan Summary

FIGURES

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Figure 2: Site Layout and Existing Monitoring Well Network

Figure 3: Historic Sampling Locations

Figure 4: Proposed Soil Boring and Monitoring Well Locations

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APPENDICES

Appendix A: WDNR "Site Investigation Review for VPLE – Not Approved"

Appendix B: BRRTS Map

Appendix C: OMNNI 2015 Investigation Information

Appendix D: SEH Geologic Cross Sections (2006 and 2013)

Appendix E: SEH Groundwater Flow Direction Maps (2006, 2008, 2011, and 2013)

Appendix F: Pertinent SEH (December 2019) and Stantec (August 2020) Data Tables

Appendix G: Certified Survey Map

1. INTRODUCTION

Ramboll US Consulting, Inc. (Ramboll), on behalf of Newell Operating Company (NOC), is submitting this Site Investigation Work Plan (“Work Plan”) to conduct additional investigation activities to define the nature and extent of impacts identified by others at the former Mirro Plant No. 20 facility located at 44 Walnut Street in Chilton, Wisconsin (the “facility” or “site”). This Work Plan has been prepared in conformance with Wisconsin Administrative Code (WAC) Chapter NR 716 and is intended to address the potential or known contaminants in all potentially affected environmental media at the site.

The objective of this Work Plan is to supplement investigation work done by others at the site on behalf of NOC or other interested parties and to address the comments provided by the Wisconsin Department of Natural Resources (WDNR) in their October 7, 2020 letter *“Site Investigation Review for VPLE – Not Approved.”* A copy of the WDNR letter is included as Appendix A. It is NOC’s understanding, based on prior discussions with the WDNR, that completion of the requested work will allow the site to obtain a Certificate of Completion under the Voluntary Party Liability Exemption (VPLE) program. This Work Plan presents a brief summary of site background information, proposed additional investigation approach, and detailed scope of work, including field and laboratory methodologies, reporting, and schedule.

1.1 Site Location

The site is located at 44 Walnut Street in the City of Chilton, Calumet County, Wisconsin (Figure 1). The property consists of two tax parcels (16631 and 16951) and is a combined 3.93 acres. The site is located in the NE ¼ of the NW ¼ of Section 18, T18N, R20E and is immediately bordered to the west and north by the south branch of the Manitowoc River (Manitowoc River), east by Walnut Street and Kaytee Products facility (400 E. Main Street), and south by an active railroad corridor. The WTM91 coordinates obtained from the WDNR RR Sites Map are as follows: X Coordinate (WTM91) 667923 and Y Coordinate (WTM91) 397300. The surrounding properties are a mixture of commercial and industrial properties. An agricultural property and limited residential properties are located immediately north across the Manitowoc River.

1.2 Site Description

The site consists of a two-story industrial building with a basement on the southwest portion of the property and slab on grade construction for the remainder of the building footprint. The building includes several additions, with paved parking and drive areas immediately north and east of the building. The balance of the site to the north is tree lined with open greenspace. The topography of the site and surrounding properties is relatively flat, with a gentle slope to the west/northwest towards the Manitowoc River, which borders the northwest property boundary. The current site layout is illustrated on Figure 2. The site is served by municipal water and sanitary sewer services provided by the City of Chilton.

The site is located in a general industrial (I-2) zoning district within the City of Chilton. Neighboring properties to the south and east are zoned industrial while properties to the north and east (across the Manitowoc River) are located within the Rural Character District (R-C).

1.3 Involved Parties

Responsible Party (RP): Newell Operating Company
6655 Peachtree Dunwoody Road
Atlanta, GA 30328
Contact: Kristin Jones, (770) 418-7822, Kristin.Jones@newellco.com

RP Representative: Patriot Environmental Management, LLC
2404 Brown Street
Pottstown, PA 19464
Contact: Hudson Green, Jr., (610) 323-4634, hgreen@patriotenviro.com

Consultant: Ramboll US Consulting, Inc.
234 W. Florida Street, Fifth Floor
Milwaukee, WI 53204
Contact: Jeanne Tarvin, (262) 901-0085, jtarvin@ramboll.com

Agency: Wisconsin Department of Natural Resources
625 E CTY Y, Suite 700
Oshkosh, WI 54901-9731
Contact: Kevin McKnight, (920) 808-0170, kevin.mcknight@wisconsin.gov

The property is currently owned by the Floorspace Development, LLC. Tenants include JTD Enterprises (metal machining), Kaytee Products (material storage), and Floor Space, Development, LLC (current property owner).

2. PROJECT BACKGROUND

Site investigation activities were initiated in the early 2000s. The following sections present an overview of the Site development, ownership history, WDNR Bureau for Remediation and Redevelopment Tracking System (BRRTS) database evaluation, and site investigation activities to date. The sections are generally presented chronologically.

2.1 Site Development and Ownership History

Manufacturing operations at the site started in the 1920s as the Aluminum Specialty Company and operated under that name until the mid-1970s, followed by several ownership and name changes. In 1980, the business was sold to Foley Manufacturing who later merged with Mirro in 1985 and became Mirro/Foley under the ownership of the Newell Company.

Historic manufacturing activities at the former Mirro No. 20 facility consisted of production of aluminum, stainless steel, and steel cookware and bakeware products beginning in the 1920s and ending in 2001. Process operations historically included metal stamping, buffing, tin dipping, parts washing, welding, and applying spray-on coatings. The site was sold by Newell Rubbermaid to Floor Space Development, LLC in 2002, and is now occupied by multiple tenants that use the warehouse space for product storage and by a machine shop that operates in the southeast portion of the building (first floor). The basement of the building is typically vacant, although it is reportedly used for additional storage when space is needed. The general site layout and pertinent site features are shown on Figure 2.

2.2 Release History

A review of the WDNR BRRTS on the Web database identified six cases at the site, with only two open cases (BRRTS Nos. 02-08-520157 ERP and 06-08-426946 VPLE), which are related to the ongoing investigation activities covered under this Work Plan. Activities related to the four closed BRRTS cases took place during Mirro/NOC's ownership of the site and included documentation of underground storage tank (UST) removals which required no action and historic spill incidents. The following provides a brief summary of the closed BRRTS cases. Figure 2 presents the location of the former USTs associated with the BRRTS listings.

2.2.1 No Action Required UST Cases

- **BRRTS No. 09-08-294564** is associated with the October 1990 removal two mineral spirits USTs (250-gallon and 1,000-gallon) located in the parking lot near the northern corner of the existing site building. Based on observations made during the removal of the USTs and soil sample analytical results post-removal, there was no indication that a release occurred, and no further action was required by the WDNR.
- **BRRTS No. 09-08-292322** is associated with the January 1996 abandonment in place of two fuel USTs (15,000-gallon each) located in the northern portion of the basement. Note that the USTs were incorrectly registered as having a capacity of 17,500-gallons each. The USTs were abandoned in place by removing the tank contents, cleaning the USTs, and filling with an inert material (concrete lower 1/3 and stone upper 2/3). Based on observations made during the decommissioning of the USTs and soil sample analytical results, there was no indication that a release occurred, and no further action was required by the WDNR.

2.2.2 Closed Historic Spill Cases

- **BRRTS No. 04-08-044370:** In January 1990, an estimated 365 gallons of an industrial chemical ("acid") was reportedly released to the environment near the northwest corner of the building when a storage container spilled. The material was neutralized prior to discharge to the sanitary sewer. No other actions were taken related to this incident and it is listed as a closed spill on the WDNR database with no associated continuing obligations.
- **BRRTS No. 04-08-363487:** In July 2002, an estimated 14 gallons of press pit oil was reportedly discharged from a drum within the building. The spill was contained and cleaned up using absorbents, which were disposed off-site at Ridgeview solid waste landfill in Whitelaw, Wisconsin. No other actions were taken related to this incident and it is listed as a closed spill on the WDNR database with no associated continuing obligations.

2.2.3 Open ERP and VPLE Cases

As referenced previously, two interrelated open BRRTS cases remain at the site which is the subject of the ongoing investigation activities currently taking place at the site. The WDNR opened this VPLE Case (BRRTS No. 06-08-426946) in March of 2003 when Newell Rubbermaid submitted an application for enrollment in the WDNR's VPLE program. The related Environmental Repair Program (ERP) case (BRRTS No. 02-08-520157) was subsequently opened in January 2004. The WDNR is providing project oversight under the VPLE program. In November 2018, Newell Rubbermaid withdrew the original application, and a new VPLE application was submitted under the NOC name. A summary of the site investigation history was most recently provided to the WDNR in a *Comprehensive Site Investigation Report* (Short Elliott Hendrickson Inc. [SEH], December 2019). A brief discussion of the site investigation history and key regulatory submittals is provided in Section 2.4.

2.3 Nearby BRRTS Cases

The WDNR BRRTS database also identified several listings for open and closed sites within the vicinity of the sites. A BRRTS map for the areas is included in Appendix B. Open BRRTS cases of primary interest to the site include the following:

- **BRRTS No. 02-08-221491:** Former Larson Cleaners (317 East Main Street) is located approximately 300 feet south (upgradient) of the site. Significant chlorinated volatile organic compounds (CVOC) impacts have been detected in soil, groundwater (shallow and deep), and in vapor beneath the former dry cleaner property. A Superfund Preliminary Assessment was

completed by the WDNR in 2019 concluded that it was feasible that the CVOC impacts identified on the former Mirro Plant 20 property originated from the dry cleaner site.

- **BRRTS No. 02-08-561133 and 03-08-000802:** Former Chilton Products, Inc. (300 E. Breed Street) is an active manufacturing site located approximately 3,000 feet north of the site. Significant volatile organic compound (VOC) impacts have been detected in soil and groundwater (shallow and deep) beneath the site. Groundwater flow at the site has been documented to the south-southeast towards the Manitowoc River, beyond which is the former Mirro Plant 20 property. Groundwater impacts extend off site with the associated monitoring well network extending to approximately 300 feet of the riverbank.

Other open BRRTS cases include former Chilton Plating Company, Inc. (420 E. Main Street; 02-08-000040) and the Schneider Property (476 E. Main Street; 02-08-000632) located approximate 700 feet east (side gradient) of the site, which also border the south branch of the Manitowoc River.

2.4 Site Investigation and Remediation History

Subsurface site investigation and remediation activities have been conducted on behalf of NOC in various phases beginning in 2002. In more recent years, site investigation work has been performed on site or immediately adjacent to the site by other interested parties. The following sections summarize the primary site investigation and remediation activities conducted to date at the site both on behalf of NOC and by others.

2.4.1 NOC Directed Activities

The site has been enrolled in the VPLE program since 2003, with direct oversight being provided by the WDNR as the work progressed. The following summarizes the NOC directed site investigation and remediation work.

2002 TEMCO Phase II Site Investigation

A Phase II was conducted by TEMCO, on behalf of Newell Rubbermaid, to address areas of concern identified in an earlier Phase I Report. The 2002 activities included the advancement of 12 hydraulic probes (SB-1 through SB-12) to depths between 8 to 12 feet to facilitate the collection of soils samples. The results of the investigation were documented in the *Phase II Environmental Site Assessment Report* (TEMCO, August 2002). TEMCO boring locations are shown on Figure 3.

2002 TEMCO Additional Field Investigation

In September 2002, TEMCO installed four groundwater monitoring wells (MW-1 through MW-4). Groundwater samples were collected from the monitoring wells in November 2002. Ramboll has been unable to secure a copy of the TEMCO report that documents these activities. TEMCO monitoring well locations are shown on Figure 3, based on information included in subsequent reports.

2006 SEH Site Investigation

In 2006, SEH conducted site investigation activities to define the magnitude and extent of impacts identified by TEMCO as described in their August 2005 Work Plan. The 2006 field activities included the installation of five groundwater monitoring wells (MW-5 through MW-9) and one piezometer (PZ-5) in February 2006. Four soil borings (B-1 through B-4) were advanced outside the building and nine borings (B-5 through B-13) advanced through the basement floor from within the building. Six of the interior borings (B-5, B-5A, B-6, B-9, B-11, and B-12) were completed as shallow groundwater monitoring points. Groundwater samples were collected from the 16 monitoring locations in February 2006 and May 2006. In addition, SEH collected water samples from the existing basement sumps and

evaluated the basement subfloor drainage system used to manage groundwater infiltration into the basement. The results of the investigation were documented in the *Site Investigation Report* (SEH, August 2006). SEH sampling locations are shown on Figure 3.

2006 SEH Additional Groundwater Monitoring

Two additional groundwater sampling events were conducted by SEH in August 2006 and November 2006. The results of the sampling were incorporated into the *Additional Site Investigation Report* (SEH, September 2008).

2008 SEH Additional Site Investigation

Based on WDNR's feedback, SEH conducted additional site investigation activities at the site to address remaining concerns. The additional investigation included the installation of one downgradient monitoring well nest (MW-10/PZ-10) and the installation of an upgradient piezometer (PZ-9). Eleven soil samples labeled with distances and cardinal directions from either SB-4 or MW-3 (e.g., 10'S + 5'E of MW-3) were collected on the western portion of the site to evaluate previously identified arsenic impacts and two samples (Transformer Pad) were collected adjacent to a transformer pad to assess the potential for polychlorinated biphenyl (PCB) impacts. Groundwater samples were collected in February 2008 and May 2008. The results of the 2008 activities were documented in the *Additional Site Investigation Report* (SEH, September 2008).

2010 SEH Arsenic Excavation

In September 2010, SEH oversaw two targeted soil excavations on the western portion of the site near former boring SB-4 and MW-3 where elevated arsenic impacts were detected. Prior to the excavation work, monitoring well MW-3 was abandoned. A total of 59.75 tons of arsenic impacted soil was excavated and disposed of off-site at a Subtitle D landfill. The soil excavation activities were documented in the *Third Stage Site Investigation Report* (SEH, January 2011). The approximate locations of the soil excavation areas are included on Figure 3.

2011 SEH Additional Groundwater Monitoring

Groundwater samples were collected in October 2011 and November 2011 from the select existing monitoring points. The groundwater monitoring results were documented in the *Third Stage Site Investigation Report* (SEH, July 2013).

2013 SEH Supplemental Site Investigation

Supplemental site investigation activities were conducted in 2013 in response to WDNR case closure denials in June 2011 and January 2012. The investigation activities included assessment of the lateral extent of the clay layer, the installation of PZ-8 in February 2013, performance of hydraulic conductivity testing, and collection of groundwater samples from select existing monitoring points in February/March 2013. The 2013 site investigation activities were documented in the *Supplemental Site Investigation Report* (SEH, July 2013).

2018 SEH Emerging Contaminant Sampling

At the request of the WDNR, groundwater samples were collected from five existing monitoring wells (MW-2, MW-5, PZ-5, MW-10, and PZ-10) in August 2018 for analysis of perfluorooctanoic acid (PFOA) and perfluorooctanesulfonic acid (PFOS) compounds. The sampling results were documented in the *PFOA and PFOS Groundwater Analytical Results* letter report (SEH, September 2018) submitted to the WDNR on September 19, 2018.

2.4.2 Environmental Activities Conducted by Others

The following describes site investigation related activities conducted both on and immediately adjacent to the site on behalf of the WDNR and/or other interested parties:

WDNR Directed Activities

On behalf of the WDNR, OMNNI Associates (OMNNI) performed a study of groundwater conditions across the broader East Main Street area of Chilton to evaluate known CVOC impacts in the area. The initial phase of the study included the collection of baseline groundwater samples in November 2013 from five WDNR installed bedrock wells along with existing groundwater monitoring wells associated with open BRRTS cases located within the study area, including but not limited to two of the existing Mirro site piezometers (PZ-5 and PZ-9) and several Larson's Cleaners site related wells (BRRTS 02-08-22-221491) south/upgradient of the former Mirro site. Based on the data collected, the primary source of chlorinated solvent impacts was determined to be the former Larson Cleaners. In December 2014, OMNNI installed a series of piezometers in the East Main Street study area including two deep piezometers near existing Mirro site well nests (MW-9/PZ-9 and east of MW-5/ PZ-5). These wells are referred in the OMNNI documents as MIPZ10/OMPZ3 and MIPZ11/OMPZ4. To avoid confusion with the site monitoring well network naming, these wells are shown on Figure 2 as OMPZ3 and OMPZ4. Groundwater samples were collected from the OMPZ3 and OMPZ4 wells in March 2015. A table and figure associated with the OMNNI activities are included as Appendix C of this Work Plan for reference. The results of the WDNR directed activities are documented in the *Groundwater Investigation for Chlorinated Solvent Contamination* (OMNNI, November 2015).

2020 Stantec Focused Phase I and II Environmental Site Assessment (ESA)

A focused Phase I and II ESA was performed by Stantec at the Mirro site in the middle of 2020 on behalf of a prospective purchaser using United States Environmental Protection Agency (USEPA) funds obtained through the Calumet County Community-Wide Assessment Grant program. The primary objective of the Phase II ESA was to evaluate the recognized environmental conditions (REC) and data gaps outlined in a recent Phase I ESA (Stantec, May 2020). The Phase II ESA activities included the collection of four surficial soil samples (PP-1 through PP-4) from a vegetated area north-northeast of the existing site building which were submitted for analysis of VOCs and Resource Conservation and Recovery Act (RCRA) metals, including mercury. Groundwater samples were collected from three existing monitoring wells (MW-2, MW-8, and MW-9), an existing piezometer (PZ-9), and six groundwater monitoring points located in the basement (B-5, B-5A, B-6, B-9, B-11, and B-12). All groundwater samples were submitted for VOC analysis. Select groundwater samples (B-5, B-9, MW-2, MW-8, and PZ-9) were collected for per and polyfluorinated alkyl substances (PFAS) analysis (Wisconsin 36-compound list).

In addition, Stantec evaluated the existing basement water conveyance/sump system (Large, East, and West sumps) and four outfalls (North, Middle, South, and Roof Drain) identified along the Manitowoc River. A water sample collected from each sump was submitted for dissolved RCRA metals, polycyclic aromatic hydrocarbons (PAHs), VOCs, and PFAS. Six samples (SS-1 through SS-6) were also collected of the solids observed on the basement floor and within the floor trenches. The solids samples were submitted for analysis of SVOCs and RCRA metals. Stantec sampling locations are shown on Figure 3. The results are documented in the *Focused Phase II Environmental Site Assessment* report (Stantec, August 2020).

3. SITE SETTING

The following discussion regarding physiographical and geological setting of the site, including topography, drainage, regional and local geology, and regional and local hydrogeology is based on information included in the *Comprehensive Site Investigation Report* (SEH, December 2019) and additional information gathered during investigations conducted by other parties.

3.1 Topography/Surface Drainage

The topography of the site and vicinity generally slopes gently to the west, northwest, and north toward the Manitowoc River, which flows along the west and northwest property line. As described in the Phase I ESA (Stantec, May 2020), the original Manitowoc River channel was located under the northwest and northeast portions of the building and central portion of the site. Based on aerial photography, the river was diverted to its current location between 1938 and 1952. Surface elevation at the site is approximately 850 feet above mean sea level (AMSL) along the southwest property line and 845 feet AMSL along the river.

3.2 Geologic Setting

Regional

The Chilton area is located in the “Eastern Drift - Paleozoic Hydrogeologic District” (Zaporozec, 1985). This district is typified by a deep high capacity Cambrian and Ordovician sandstone aquifer and a shallower Silurian dolomite aquifer separated by the Maquoketa shale confining layer. The Silurian dolomite aquifer is the primary municipal water supply aquifer in the eastern portion of the district, including the site vicinity. Unconsolidated sand and gravel aquifers in the district are quite discontinuous and are often used as the primary water supply source where these deposits are found (often in buried bedrock valleys).

Local Geology

Subsurface drilling activities performed at the site historically were completed to a maximum depth of 30 feet below ground surface (bgs). Off-site piezometer OMPZ4 completed by OMNNI in 2015 was advanced to 55 feet bgs and is located approximately 10 feet east of MW-5/PZ-5 well nest. Anthropogenic fill soils consisting of sands with some gravels, gravels, and clays were encountered to depths ranging from 4.5 to 8 feet bgs within the area of investigation. On the northern and western portions of the site, and beneath portions of the site building, the fill soils are underlain by sand and silty sand deposits (likely alluvial deposits from the Manitowoc River). Soils underlying the fill on the southern and eastern portions of the site consist of lean clays and silts (likely ground moraine deposits). At some locations, the lean clay soils are underlain by sand and silty sand deposits. Bedrock was encountered in off-site piezometer OMPZ4 at a depth of 41 feet bgs. Site geologic conditions are depicted on the SEH geologic cross sections and extent of clay figures included in Appendix D and in the OMNNI geologic cross sections included in Appendix C.

3.3 Hydrogeologic Setting

Ten shallow monitoring wells (MW-1 through MW-10) and four nested piezometers (PZ-5, PZ-8, PZ-9, PZ-10) were installed at the site during the NOC led site investigations along with two deeper piezometers (OMPZ3 and OMPZ4) installed as part of a WDNR led area wide investigation. In addition, six temporary screened standpipes (B-5, B-5A, B-6, B-9, B-11, and B-12) were installed through the floor in the building basement. These groundwater monitoring points were utilized to assess groundwater conditions and hydrogeologic conditions at the site. Previously prepared groundwater flow maps developed by SEH are included in Appendix E. Four surface water point

elevations were installed and surveyed by SEH along the Manitowoc River to assess site groundwater interactions. The shallow groundwater surface at the site was typically found between approximately 2 to 9 feet bgs during the site investigations. Direction of groundwater flow at the site is generally to the north/northeast at a horizontal hydraulic gradient of approximately 0.005 foot per foot (ft/ft) (SHE, 2019). Vertical hydraulic gradients at the site were previously calculated in 2013; however, recent water level measurements completed by Stantec in June 2020 were used to provide additional calculations. Overall, vertical gradients are generally downward at well nest MW-9/PZ-9, and upward at well nests MW-8/PZ-8 and MW-5/PZ-5. Vertical hydraulic gradients at well nest MW-10/PZ-10 appear to be seasonally influenced.

3.4 Potential Migration Pathways and Receptors

The subject property is zoned for industrial land use. Potential receptors of contamination are limited to the shallow groundwater at the site, and potentially the surface water of the Manitowoc River. The site is connected to the City of Chilton's municipal potable water system which obtains its supply from multiple water wells. Previous soil direct contact Residual Contaminant Level (RCL) exceedances for arsenic in shallow on-site soils have been remediated through excavation activities. On-site soil direct contact RCL exceedances for CVOCs and PAHs are present; however, potential exposure is limited due to existing engineering controls and current site use. Subsurface utility lines are not expected to act as preferential conduits for contaminant migration from the site due to the relatively shallow depth to groundwater at the site, and the presence of granular soils at many site locations. Vapor intrusion is a possible contaminant migration pathway due to the CVOCs previously identified in groundwater at the site and within the basement sumps.

3.5 Degree and Extent of Contamination to Date

Investigation activities conducted to date have included the assessment of soil and groundwater along with basement sump discharge water and solids observed in 2020 in the basement. The following sections provide a brief summary of the results. A compilation of pertinent data tables is presented in Appendix F.

3.5.1 Contaminants of Concern Detected in Soil and Groundwater

Prior investigation activities at the site identified the presence of the following compounds in soils above WAC NR 720 RCLs and/or groundwater above WAC NR 140 Preventative Action Limits (PALs) or Enforcement Standards (ESs):

- VOCs (saturated soil and groundwater)
- PAHs (soil and groundwater)
- various metals (soil and groundwater)
- PCBs (soil only – groundwater not sampled).

In addition, PFAS (groundwater only – soil not sampled) were detected above proposed WAC NR140 PALs but below the proposed ESs.

3.5.2 Contaminant Distribution in Soil and Groundwater

As referenced previously, several phases of site investigation have been completed to date by NOC and others. Ramboll completed a review of the reported results to evaluate the general distribution of the identified contaminants in soil and groundwater. The historical groundwater elevations measured at the site (2 to 9 feet bgs) potentially indicate some soil samples were collected at or below the groundwater surface.

VOCs

VOCs have been detected in soil above the current WAC NR 720 RCLs and in groundwater above the WAC NR 140 ES as summarized below at the site. The estimated extents of VOC impacts in soil appear to be discontinuous and limited. The estimated extent of VOC impacts above WAC NR 140 ES groundwater criteria are along the eastern and central portion of the property. In general, the discrete areas of on-site soil VOC impacts do not coincide with locations with elevated groundwater impacts.

Soil – Nearly 50 soil samples were analyzed for VOCs as part of the previously completed site investigation activities. While limited, VOCs including, but not limited to benzene, dibromochloromethane, 1,1-dichloroethene (1,1-DCE), methylene chloride, naphthalene, tetrachloroethene (PCE), trichloroethene (TCE), 1,2,4-trimethylbenzene (1,2,4-TMB), and total xylenes were reported in soil samples at concentrations that are above one or more of the applicable WAC NR 720 RCLs. Only one non-industrial direct contact RCL exceedance was detected out of the 49 soil samples analyzed and no industrial direct contact RCL exceedances were detected for VOCs. TCE was detected in the soil sample collected within the direct contact interval (0 to 4 feet bgs) at PZ-10 (2'-4') at a concentration of 2.6 milligrams per kilogram (mg/kg), which is above the non-industrial RCL but below the industrial RCL. TCE was detected in off-site soils from PZ-9 (4 to 6 feet bgs) at a concentration of 1.5 mg/kg; however, the soil sample was collected below the direct contact interval and may represent saturated soil conditions. Groundwater pathway RCL exceedances for VOCs were generally detected along the western portion of the building and along the railroad right of way. No soil samples collected for VOC analysis exceed the WAC NR 720 industrial RCL.

Groundwater – CVOCs 1,1,2,2-trichloroethane (1,1,2,2-TCA), 1,2-dichloroethane (1,2-DCA), cis-1,2-dichloroethene (cDCE), PCE, TCE, and vinyl chloride were detected above the WAC NR 140 ES in monitoring locations primarily located along the eastern portion of the site. Concentrations of 1,1,2,2-TCA above its WAC NR 140 ES were detected in basement monitoring points B-5 and B-5A in 2006; however, subsequent sampling events in 2008, 2009 (B-5 only), and 2020 did not detect 1,1,2,2-TCA. Concentrations of PCE and PCE breakdown products (TCE, cDCE, and vinyl chloride) vary seasonally and were detected above their respective WAC NR 140 ES criteria in monitoring locations B-11, B-12, PZ-5, MW-8, PZ-8, PZ-9, PZ-10, and OMPZ3 (installed near MW-9/ PZ-9) during one or more of the sampling events conducted to date. Generally, PCE and PCE breakdown product concentrations trends at all monitoring locations have increased over time and vary seasonally. Piezometers PZ-5, PZ-8, PZ-9, PZ-10, and OMPZ3 all have higher concentrations of PCE and PCE breakdown products compared to their shallow, corresponding well (MW-5, MW-8, MW-9, and MW-10) indicating an off-site source. 1,2-DCA was detected in centrally located shallow monitoring well locations ranging between 0.15 microgram per liter (µg/L) (B-12, 8/29/2006) to 2.7 µg/L (MW-3 [abandoned], 2/19/2008) but below its WAC NR 140 ES. Concentrations of 1,2-DCA at piezometers PZ-5 and PZ-10 have exceeded the ES ranging from 5.2 µg/L (PZ-5, 2/28/2013) to 50 µg/L (PZ-10, 2/28/2013). 1,2-DCA was not detected above laboratory detection limits in groundwater at ten monitoring locations sampled by Stantec in 2020.

PAHs

PAHs were detected in soil and groundwater at the site during prior site investigation activities. The PAHs impacts are generally located in potential fill material (e.g., railroad right of way, building foundations, and the former Manitowoc River channel).

Soil – Thirty-nine soil samples were analyzed for PAHs at the site. PAHs, including but not limited to benzo(a)pyrene (B[a]P), benzo(b)fluoranthene (B[b]F), chrysene, and pyrene, were detected in soil

samples at concentrations above one or more applicable WAC NR 720 RCLs. The sample from MW-7 (0'-4') detected B(a)P above its non-industrial direct contact RCLs. The sample from MW-4 (2'-8') detected B(a)P above its industrial direct contact RCL. PAHs above the groundwater pathway RCLs are generally located within fill soil.

Groundwater – Several PAH compounds were detected in the initial groundwater sampling event indicating suspended sediment within the sample. Chrysene was detected above WAC NR 140 ES criteria in B-9 and PZ-9. B(b)F was detected above WAC NR 140 ES criteria in only B-9. Subsequent sampling events at all monitoring locations, including both B-9 and PZ-9, did not detect any PAH compounds in groundwater above applicable WAC NR 140 ES. No PAHs were detected above their respective WAC NR 140 PAL or ES in the most recent groundwater sampling event for each monitoring location.

Metals

Select metals were detected in soil and groundwater above applicable WAC NR 720 RCLs. These metals include arsenic, cadmium, lead, mercury, selenium, and silver.

Soil – Forty-one soil samples were analyzed for at least one metal (arsenic, barium, cadmium, chromium, lead, mercury, selenium, and silver) at the site. Four locations (MW-1, MW-2, MW-3, and MW-4) were analyzed for trivalent- and hexavalent chromium in the direct contact internal (0 to 4 feet bgs). Six soil borings (B-1, B-2, B-3, SB-1, SB-2, PZ-9) were completed off-site along the railroad corridor. The following provides a summary of metals results above applicable WAC NR 720 RCL and/or established Background Threshold Values (BTVs).

- Arsenic was detected in all but two soil samples; however, only two off-site soil samples adjacent to the railroad, B-2 (0'-2') and B-3 (0'-2'), remain after the arsenic soil excavations that were greater than all applicable WAC NR 720 RCLs. No soil samples collected on site are above the non-industrial or industrial direct contact RCLs. Arsenic was detected greater than 4 feet bgs in SB-4 (4'-7') and SB-4 (8'-12') at concentrations of 10 mg/kg, each, which exceeds the groundwater pathway RCL of 0.584 mg/kg and BTV of 8.3 mg/kg. This sample depth is below the direct contact zone of 0 to 4 feet bgs.
- Cadmium was detected in 20 soil samples; however, only two samples (SB-3 [0'-4'] and MW-2 [2'-4']) detected cadmium above its groundwater pathway RCL of 0.752 mg/kg and BTV of 1.07 mg/kg at concentrations of 1.1 mg/kg and 1.2 mg/kg. The remaining cadmium detections in soil were below applicable RCLs.
- Lead was detected in all soil samples. Soil concentrations were greater than the groundwater pathway RCL of 27 mg/kg and BTV of 51.6 mg/kg in 11 soil samples across the site ranging from 58.4 mg/kg (B-3 [2'-4']) to 201 mg/kg (SB-3 [0'-4']). The extent of lead in soil above its groundwater pathway RCL is generally located within fill soil. Soil samples for lead did not exceed the non-industrial or industrial direct contact RCL for lead.
- Mercury was detected in 29 soil samples; however, only three soil samples (B-3 [2'-4'], SB-2 [0'-4'], SB-5 [0'-4']) detected mercury above its groundwater pathway RCL of 0.208 mg/kg at concentrations ranging from 0.280 mg/kg (SB-2 [0'-4']) to 0.382 mg/kg (B-3 [2'-4']). No soil samples exceeded the non-industrial or industrial direct contact RCL for mercury.
- Selenium was detected in seven soil samples (B-6 [1.5'-3'], MW-7 [0'-4'], SB-2 [0'-4'], SB-3 [0'-4'], SB-4 [8'-12'], SB-5 [0'-4'], and SB-6 [6'-7']) at concentrations above its groundwater pathway RCL of 0.52 mg/kg. No soil samples exceeded the non-industrial or industrial direct contact RCL for selenium.

- Silver was detected in six soil samples (SB-2 [0'-4'], SB-3 [0'-4'], SB-4 [4'-7'], SB-4 [8'-12'], SB-5 [0'-4'], SB-6 [6'-7']) above its groundwater pathway RCL of 0.85 mg/kg ranging from 2.1 mg/kg (SB-4 [8'-12']) to 12 mg/kg (SB-4 [4'-7']). No soil samples exceeded the non-industrial or industrial direct contact RCL for silver.

Groundwater – Every monitoring location except PZ-8, and OMPZ3 and OMPZ4 has been analyzed for the dissolved 8 RCRA metals at least once during site investigation activities. Dissolved arsenic groundwater concentrations in PZ-5 were above the WAC NR 140 ES criteria of 10 µg/L ranging from 10.3 µg/L (February 2006) to 24 µg/L (May 2008). Dissolved arsenic groundwater concentrations in monitoring well locations MW-2, MW-3, MW-5, MW-6, MW-7, MW-9, PZ-9, MW-10 were detected above the WAC NR 140 PAL of 1.0 µg/L. One dissolved cadmium concentration in MW-4 collected in February 2006 (0.77 µg/L) was greater than the WAC NR PAL of 0.5 µg/L; however, two subsequent groundwater samples collected in 2008 (February and May) were 0.020 µg/L and non-detect (<0.12 µg/L).

PFAS

To date, soil samples for PFAS compounds have not been submitted for analysis. Beginning in 2018, five groundwater monitoring well locations (MW-2, MW-5, PZ-5, MW-10, and PZ-10) were sampled for only two PFAS compounds, perfluorooctanoic acid (PFOA) and perfluorooctanesulfonic acid (PFOS). During the June 2020 Phase II ESA activities, five groundwater monitoring locations (B-5, B-9, MW-2, MW-9, and PZ-9) were sampled for the Wisconsin 36 PFAS compound list, including PFOA and PFOS.

PFAS compounds do not currently have promulgated WAC NR 140 ES and PAL criteria; however, the WDNR has requested the Wisconsin Department of Health Service (WDHS) to develop recommended WAC NR 140 groundwater criteria under Cycle 10 and Cycle 11 requests. Groundwater samples collected for PFAS analyses were compared to the proposed criteria.

All monitoring well locations sampled for PFAS compounds were installed prior to the development of drilling PFAS procedures eliminating or limiting potential PFAS containing drilling materials during drilling activities. In addition, most of the monitoring well location screen materials were manufactured prior to the phase-out of perfluorooctanyl compounds (PFOA, PFOS, PFHxS, and related precursors) in 2008.

Groundwater – Of the nine monitoring locations sampled for PFAS compounds, only MW-5 (PFOS at 4.2 nanograms per liter [ng/L], 8/9/2018) and MW-8 (PFOA at 2.5 ng/L, 6/4/2020) detected PFOA or PFOS above the proposed Cycle 10 WAC NR 140 PAL of 2.0 ng/L but below the proposed ES of 20 ng/L. Minor concentrations of other PFAS compounds were detected but did not exceed the proposed ES or PAL for the detected compound or, in some cases, a combined compound criteria (e.g., PFOA and PFOS).

PCBs

Four soil samples have been collected at the site and analyzed for PCBs during site investigation activities. The sampling was focused on areas adjacent or near electrical equipment. Only the soil sample collected from B-10 (0.5-1.5), immediately under the basement floor concrete slab in the “transformer room,” detected one PCB Aroclor (Aroclor 1254) at 0.018 mg/kg, which is above its PCB groundwater pathway RCL of 0.0047 mg/kg. PCBs were not detected in the remaining three samples collected at the site. To date, groundwater samples have not been analyzed for PCBs.

3.5.3 Basement Subfloor Drainage System

The basement subfloor drainage system includes a network of shallow floor trenches that connect to three active sumps. The sumps have historically been referred to as the East Sump, West Sump, and Large Sump as shown on Figure 2. Four outfalls are present along the Manitowoc River associated with the site. For the purposes of this report, the outfalls are referenced as North, South, Roof Drain 1 and Roof Drain 2 as shown on Figure 2. The East Sump water discharges to the Large Sump via overhead conveyance piping. The northern most outfall (North) receives discharges from the combined Large Sump and East Sump. The outfall labeled "South" receives discharge from the West Sump. The outfall labeled "Roof Drain 1" appears to be associated with an active roof drain. The outfall labeled "Roof Drain 2" also appears to have been previously associated with the roof drain system; however, it is now visibly broken and no longer functioning. Sampling associated with the basement subfloor drainage system has included collection of water samples from the sumps along with solids observed within the basement. The following provides a summary of the sampling results.

Water samples have been collected of the sump water periodically throughout the site investigation activities (2006 to 2013) and analyzed for one or more of the following analytes: VOCs, PAHs, RCRA Metals, and diesel range organics (DRO). Most recently, sump water samples were collected during the Stantec 2020 Phase II and analyzed for VOCs, PAHs, RCRA Metals, and PFAS. The following observations are made based on the June 2020 sump water sample results (Stantec, 2020). The results are compared to WAC NR 105 Surface Water Quality Criteria¹:

- VOCs: VOCs detected in the Large and East Sump water samples included PCE, TCE, cis-1,2-DCE, trans-1,2-DCE, VC, and 1,2-DCA; however, none of the detected VOCs exceeded the WAC NR 105 surface water criteria. No VOCs were detected in the West Sump water sample.
- PAHs: No PAHs detected.
- RCRA Metals: Three dissolved RCRA metals (arsenic, barium and chromium) were detected in one or more of the sumps; however, none of the detected concentrations exceeded WAC NR 105 criteria.
- PFAS: Several PFAS compounds were detected in each of the sump water samples; however, there are no current surface water standards for these compounds. While not a direct comparison, the concentration of PFOS in the West Sump is above the proposed WAC NR 140 ES of 20 ng/L; however, groundwater samples collected in June 2020 from nearby monitoring locations MW-2 and B-9 are below the proposed WAC NR 140 PAL of 2 ng/L.

A comparison of the sump water samples to the groundwater samples in nearby wells shows relatively similar or lower concentrations. One general exception to this appears to be the PFAS concentration in the West Sump water where PFAS are detected in the water sample at a concentration higher than the groundwater.

Samples (SS-1 through SS-6) were also collected of solids observed on the basement floor and within the basement trench system during the June 2020 Stantec Phase II. The samples were analyzed for SVOCs, PCBs and RCRA metals. The results of the testing documented elevated levels of metals in the

¹ WDNR Surface Water Quality Criteria and Secondary Values for Toxic Substances (ch. NR 105 WAC; WAC, 2010). For the Manitowoc River, values for "Non-Public Water Supply," "Warm Water Forage, Limited Forage, and Warm Water Sport Fish Communities" are assumed for determining the Human Threshold (ch. NR 105.08 WAC, Table 8) and Human Cancer (ch. NR 105.09 WAC, Table 9) Surface Water Quality Criteria (Stantec, 2020).

solids and to a lesser degree SVOCs. PCB Aroclor 1254 was detected in four of the six samples with a maximum detected concentration of 2.5 mg/kg.

4. OVERVIEW OF SITE INVESTIGATION APPROACH AND STRATEGY

This Work Plan was developed in response to the comments provided by the WDNR in their October 7, 2020 letter (Appendix A). The additional investigation activities discussed herein are intended to complete the WAC NR 716 site investigation and allow the site to secure a Certificate of Completion under the VPLE program. The primary items outlined in the WDNR letter generally included the following:

- Verify site property boundaries and impact on investigation results.
- Perform additional soil delineation north and south of the building.
- Complete the PFAS site investigation.
- Assess whether sediment and/or surface water in the Manitowoc River has been adversely impacted.
- Evaluate the potential for vapor intrusion.
- Address solids accumulated in the basement water management system.

A number of pre-investigation tasks have been identified to assist in the successful and effective completion of the WAC NR 716 investigation. Some of these activities have already been initiated as part of the Work Plan scoping process including performance of an updated property boundary survey. A copy of the certified survey map is included in Appendix G. This survey confirms the property boundary is generally as shown on prior SEH figures. While the property boundary shown on the Stantec figures is based on information from the Calumet County GIS website, the boundary is not consistent with the property deed.

This Work Plan presents the means and methods for conducting investigation activities at the site. The results of the site investigation will be used in conjunction with the previous phases of investigation data to allow the site to achieve regulatory case closure under the VPLE program. The following investigation activities are proposed:

- Document and assess accumulated sediments and solids within the basement wastewater/sump system including the basement floor to the extent practicable. Collect representative samples of the solids from the trenches and immediately prior to entering the sump. Up to six samples will be collected for analysis of VOCs, PFAS (WI 33 Compound List), PAHs, PCBs and 8 RCRA metals. In addition, up to four composite samples will be submitted for waste characterization parameters.
- Collect water samples from the three basement sumps to confirm the June 2020 Stantec results. Samples will be submitted for analysis of VOCs, PFAS (WI 33 Compound List), PAHs, PCBs and 8 RCRA metals.
- Conduct a baseline groundwater level measurement and groundwater sampling event. The existing monitoring well network (twelve monitoring wells and four piezometers) will be sampled for VOCs, PFAS (WI 33 Compound List), and select metals (8 RCRA metals). A request for access to two off site piezometers in proximity to well nests MW-5/PZ-5 (OMPZ4) and MW-9/PZ-9

(OMPZ3) will be submitted to the WDNR and the appropriate property owner. In addition, a groundwater sample will be collected from basement monitoring point B-9 for analysis of PCBs.

- Drill twelve soil borings and convert three of the borings into WAC NR 141 compliant monitoring wells to better understand the magnitude and extent of soil and groundwater impacts based on WDNR's comments. The borings will be advanced to approximately 10 feet bgs depending on previous investigation data and observations during drilling. Groundwater table monitoring wells will be screened across the shallow aquifer at approximately 4 feet bgs. Soil within each boring will be sampled for VOCs, PAHs, and/or select metals (8 RCRA metals) from the direct contact interval (0 to 4 feet bgs) and vadose zone (approximately 4 to 8 feet bgs).
- Advance two soil borings to depths of approximately 30 feet bgs (below the groundwater table surface) to vertically define groundwater impacts in the shallow aquifer. These deeper soil borings will be completed as WAC NR 141 piezometers and screened at similar depths as the existing site piezometer wells.
- Perform a comprehensive groundwater sampling event in the existing and new monitoring wells and piezometers for VOCs, PAHs, PFAS (WI 33 Compound List), and select metals (8 RCRA). Comprehensive groundwater level measurements will be collected during the sampling event.
- Collect up to four indoor air samples from select areas within the basement (e.g., sump areas). Vapor samples will be submitted for VOC analysis by TO-15.

The results from the work outlined above will be presented in a NR 716 *Site Investigation Report* (SIR).

5. SITE INVESTIGATION WORK PLAN

The following section presents a description of the work to be completed during the site investigation. The contents of this section were prepared in accordance with WAC NR 716.

5.1 Pre-Site Investigation Activities

5.1.1 Health and Safety

A site-specific Health and Safety Plan (HASP) will be developed in accordance with Occupational Safety and Health Administration (OSHA) 29 CFR 1910 for the proposed field activities. The HASP will also identify areas that may be considered confined spaces within the facility basement where special measures will need to be taken to allow for implementation of the tasks described in this Work Plan. Ramboll will review the HASP with all field personnel prior to commencing the field activities.

5.1.2 Data Development and Management

Historic site investigation reports will be obtained to allow for a complete review and presentation of the data collected to date. Previously tabulated data will be verified using historic laboratory analytical reports to ensure accuracy of previously reported data. Ramboll will then prepare updated data tables that compare the historic data to the current regulatory standards. This effort will be completed prior to mobilization to the field for subsurface investigation activities presented in the following sections. Should the result of this effort identify other areas on site that warrant further investigation, additional sampling may be recommended. The WDNR will be notified regarding any significant planned changes to the scope of work presented in the Work Plan prior to implementation of the field activities.

5.1.3 Off-Site Access

Approval will be requested from the WDNR and the associated property owners to access and sample piezometer wells OMPZ3 (adjacent to MW-9/PZ-9) and OMPZ4 (near MW-5/PZ-5) during implementation of the Work Plan tasks described herein. The WDNR will be kept apprised of NOC's efforts to secure access and potential schedule impacts. NOC may seek WDNR's assistance, as appropriate.

5.2 Basement Subfloor Drainage System Assessment

The basement subfloor drainage system will be evaluated, and additional solids samples collected to further assess the existing conditions. The primary tasks will include the following:

- Mapping of the trench system and conveyance piping, evaluation of current operating conditions, and quantification of solids volumes, types, and location.
- Inspection of each sump location to gather current conditions and construction and operation information.
- Collection of water samples from the East Sump, West Sump and Large Sump to confirm the Stantec 2020 results. The samples will be submitted for analysis of VOCs, PAHs, PFAS (WI 33 Compound List), PCBs, and 8 RCRA metals.
- Collection of samples of the solids accumulated within the basement trench system. Up to 6 discrete samples will be collected from the solids present within the trench system with at least one sample collected immediately prior to entering each sump. The samples will be submitted for analysis of VOCs, PAHs, PFAS (WI 33 Compound List), PCBs, and 8 RCRA metals. In addition, up to four composite samples will be collected and submitted for waste characterization analyses including Protocol B and PFAS (WI 33 Compound List).

Based on the results of the assessment and sampling activities described above, a determination will be made regarding the need for further testing or additional actions.

5.3 Baseline Groundwater Sampling Event

Groundwater samples will be collected from the existing on-site and off-site monitoring wells (twelve monitoring locations and four piezometers) associated with NOC's investigation activities, and the two wells installed by OMNNI in 2015 (OMPZ3 and OMPZ4) using special precautions for PFAS sampling. The integrity of each well be assessed prior to sample collection to ensure they are viable sampling points and/or to identify the need for well maintenance/repair. Groundwater samples will be analyzed for VOCs, PFAS (WI 33 Compound List), and 8 RCRA metals as summarized on Table 1. The existing monitoring well network is shown on Figure 2. Groundwater sampling will be conducted in general compliance with WDNR guidance, where applicable. Please note that monitoring wells MW-4, MW6, and MW-7 were previously reported as damaged and will not be sampled. Abandonment of these wells is further described in Section 5.4.7 of this Work Plan.

Prior to the groundwater sampling activities, depth to groundwater measurements will be taken using a Heron electronic water level sensor, Model ET-94 (accuracy 0.01 feet) or similar equipment from the existing monitoring well network. Depth to groundwater and total well depth will be recorded in a bound, PFAS free, field notebook.

The monitoring wells will be sampled using low-flow groundwater sampling techniques, which involve utilizing a submersible pump or peristaltic pump with PFAS-free disposable high-density polyethylene (HDPE) tubing. New disposable HDPE tubing will be utilized for sample collection at each well location.

A new pair of powder-free, nitrile gloves will be used during the collection of each sample to minimize the potential for cross-contamination. Non-disposable groundwater sampling equipment will be thoroughly decontaminated between each sampling location using an Alconox[®] solution and rinsed in laboratory supplied PFAS-free, deionized water. Field measurements of temperature, pH, conductivity, dissolved oxygen (DO), and oxygen reducing potential (ORP) will be collected prior to sampling.

The groundwater samples will be placed directly into laboratory-supplied containers, which will be sealed, labeled, and placed on ice pending delivery under chain-of-custody procedures to a Wisconsin-certified laboratory, for analysis. Groundwater samples collected for dissolved metal analysis will be field filtered. In regard to PFAS, if the selected laboratory has not received Wisconsin certification, the laboratory must be enrolled in the certification process and have been audited by the WDNR. One duplicate groundwater sample will be collected for every ten samples, one field blank per sampling day, and one trip blank per sample cooler will be included in the shipping container and will be analyzed for VOCs and PFAS. Groundwater samples will be analyzed for the following analyses and method:

- VOCs (USEPA Method 8260B)
- Dissolved 8 RCRA Metals (USEPA Method 6020/6020A and 7470)
- PFAS (State of Wisconsin list of 33 analytes, Modified USEPA Method 537.1)

Based on prior site investigation results, sampling for PCBs from the broader existing monitoring wells is not proposed. As indicated on Table 1, the groundwater sample collected from basement monitoring point B-9 will be analyzed for PCBs (USEPA Method 8280) to assess groundwater near the previous detection of PCB Aroclor 1254 in the soil sample collected from boring B-10.

Data collected during this baseline groundwater sampling event will be utilized to confirm groundwater flow, vertical gradients, and contaminant distribution across the site. If significant modifications to the scope of work described in the following sections is deemed necessary, a Work Plan Addendum will be submitted to the WDNR for review and approval.

5.4 Site Investigation Activities

The following site investigation activities are proposed to complete the delineation of site related impacts identified during previous investigation efforts. The necessary permits, approvals, and/or access agreements will be secured prior to implementation.

5.4.1 Utility Clearance

Prior to conducting intrusive site investigation activities, utility mark-outs will be coordinated through Diggers Hotline. Ramboll will contract with a private utility locator to complete a geophysical survey (e.g., using ground-penetrating radar) to identify subsurface utilities and confirm their location prior to initiating any intrusive work in the areas where subsurface investigation activities will occur. Proposed sampling locations may be modified to avoid subsurface and overhead utilities or other obstructions, as appropriate.

5.4.2 Soil Sampling and Monitoring Well/Piezometer Installation

Soil boring, monitoring well, and piezometer locations were selected to further delineate the extent of soil and groundwater impacts horizontally and vertically at the site and as specifically requested by the WDNR. Based on anticipated subsurface conditions, a combination of direct push and hollow stem auger drilling methodologies will be utilized. Fourteen soil borings will be advanced to depths ranging

from 4 to 30 feet bgs. Three of the borings will be completed as WAC NR 141 groundwater monitoring wells and two as piezometers. The proposed soil boring, monitoring well and piezometer locations are depicted on Figure 4. These proposed locations may be modified slightly based on conditions encountered in the field.

Soil samples will be continuously collected from the borings for visual observation and field screening. Soil samples will be screened in the field with a photoionization detector (PID) equipped with a 11.7 electron volt (eV) lamp for the presence of VOCs. Soil characteristics (e.g., texture, color), PID readings, and visual and/or olfactory evidence of impacts will be recorded on soil boring logs.

Up to two soil samples will be collected from each boring location based on conditions encountered. One soil sample will be collected within the first 4 feet bgs to assess the direct contact pathway. The second soil sample will be collected above the water table to vertically delineate impacted soil. The soil samples will be collected and placed in appropriately preserved, laboratory-supplied containers. After the samples have been collected, they will be sealed, labeled, and placed on ice pending delivery under chain-of-custody procedures to the laboratory for analysis. Where laboratory methods and hold-times allow, some samples may be submitted to the laboratory, but only analyzed if the results for the shallower or adjacent borings warrant.

The soil samples will be submitted to a Wisconsin-certified laboratory, for standard turn-around time analysis. Soil samples will generally be analyzed for at least one of the following analyses: VOCs, PAHs, or 8 RCRA metals. The selected analysis depends on previously collected historical soil data. Detected contaminants in the direct contact interval (0 to 4 feet bgs) will be compared to WAC NR 720 Non-industrial and Industrial Direct Contact RCLs for soil. Detected contaminants near the groundwater table will be compared to the WAC NR 720 soil to groundwater pathway RCLs. Table 1 provides the sampling and analysis plan for the soil boring activities.

The groundwater monitoring wells will be constructed in accordance with WAC NR 141 requirements using 2-inch diameter, flush thread Schedule 40 polyvinyl chloride (PVC) riser pipe, and 10 feet of 2-inch diameter PVC factory cut (0.010-inch) slotted well screen. Coarse silica filter sand packs will be placed from the bottom of the boreholes to 1 to 2 feet above the top of the well screens. Following placement of the coarse sand packs, 1 to 2 feet of fine sand pack will be placed, followed by bentonite chips or slurry to ground surface. Due to the shallow depth to groundwater, the required fine sand pack may be reduced to allow for an appropriate amount of annular space sealant to be placed. The piezometer wells will be constructed in a similar method; however, 5 feet of slotted well screen will be used for construction. Special precautions for installing wells for PFAS sampling will be employed.

Groundwater monitoring and piezometers wells will be developed in accordance with WAC NR 141 to remove residual materials remaining in the wells after installation and to re-establish the natural hydraulic flow conditions of the formations, which may have been disturbed by the well construction.

Upon completion of the groundwater monitoring and piezometer well installation activities, the location of each groundwater monitoring well will be surveyed and tied into the existing well network. The top of casing elevations and ground surface elevations the new monitoring wells and piezometers will be surveyed to vertical accuracies of 0.01 feet to aid in the determination of groundwater flow direction, vertical hydraulic gradient calculation, and assessment of groundwater contaminant movement and distribution.

5.4.3 Groundwater sampling

Following installation of new groundwater monitoring wells and piezometers, groundwater samples will be collected from all locations sampled during the baseline groundwater sampling event (18 locations) and new monitoring wells and piezometers using special precautions for PFAS sampling. Groundwater samples in all new monitoring wells will be analyzed for VOCs, PAHs, PFAS (WI 33 Compound List) and 8 RCRA metals. The previously sampled existing monitoring well network will be evaluated prior to groundwater sampling activities to distinguish which analyses are appropriate for this additional sampling event.

All existing and new monitoring wells and piezometers will be gauged and sampled using similar methods described in Section 5.3 – Baseline Groundwater Sampling Event.

5.4.4 Vapor Intrusion Assessment

Prior site investigation activities have documented that groundwater is in direct contact with the basement floor, at least seasonally. As a result, there appears to be insufficient unsaturated zone thickness to allow for the collection of sub-slab vapor samples from beneath the basement floor. As a result, the vapor intrusion assessment will focus on the assessment of indoor air quality.

Building Survey and Inspection

Prior to performing the indoor air sampling, Ramboll will conduct a survey of items in the basement area sampling area that may contribute to CVOCs to the basement indoor air, primarily chemicals, cleaning products, etc. Ramboll will complete a building physical survey questionnaire with the owner or owner representative. If items that could potentially interfere with indoor air sampling activities are identified, Ramboll will request the property owner remove and/or relocate the items prior to the sampling event. The building survey will also identify significant or unusual potential preferential migration pathways through the building slab, if possible. Preferential pathways include utility conduits (wall or slab penetrations) and wall or slab cracking that are significant or atypical for a standard structure.

Indoor/Outdoor Air Sampling Methodology

Indoor air samples will be collected at four locations within the basement from within the breathing zone, approximately 3 to 5 feet above the floor. Sampling locations are shown on Figure 5. The samples will be collected utilizing a laboratory individually certified clean 6-liter Summa canister and will be collected over an 8-hour period. Indoor air samples will be collected until a negative pressure of approximately 2 to 4 inches of mercury (in-Hg) is observed on the vacuum gauge. All field measurements will be recorded during sampling.

Concurrently, an outdoor background air sample will be collected to evaluate the air quality surrounding the property, per WDNR guidance. Ramboll will work with the property owner to identify suitable and secure locations for the outdoor canisters. The outdoor air sample will be collected following the same procedures as the indoor air samples.

5.4.5 Monitoring Well Abandonment

Based on a review of available historic documents, monitoring wells MW-4, MW-6, and MW-7 were reported as damaged and have not been sampled since approximately October 2011. Monitoring wells MW-6 and MW-7 were located during Ramboll's December 2020 surveying activities and were confirmed to be damaged. Monitoring well MW-4 was not visible and appears to have been located in a low spot within the asphalt paved drive and covered with sediment. Reasonable efforts will be made to locate MW-4 to allow for proper abandonment. Once located, the three monitoring wells will be

abandoned in accordance with WAC NR 141 and the surface restored with asphalt. Well abandonment documentation will be prepared and included in the SIR.

5.5 IDW Management

Soil cuttings and purge water generated during site investigation activities will be containerized in individual 55-gallon drums and labeled. The drums will be staged at an approved, accessible location designated by the current site owner or their designated representative. Representative waste characterization samples will be collected from the drums and submitted to a Wisconsin-certified laboratory (or undergoing the certification process and been audited by the WDNR), for Protocol B and PFAS analyses.

Waste profile(s) will be completed and submitted to a waste disposal company for transportation and disposal at a licensed waste facility. Waste disposal documentation will be provided in the SIR.

5.6 Reporting

Following substantial completion of the site investigation, a WAC NR 716 SIR will be prepared. The SIR report will include all required WAC NR 716 site information and certification requirements as follows:

- background information for the site including a summary of prior investigations at the site;
- tabulation and presentation of historic site investigation data compared to current regulatory standards;
- summary of the Ramboll investigation activities at the site which will include field measurements, a summary of geologic and hydrogeologic characteristics, observations, and a discussion of the analytical results; and figures and tables to illustrate the results of the investigations at the site;
- conceptual site model outlining the nature and extent of contamination, and identification of potential receptors, and
- conclusions and recommendations for additional action if appropriate or the next steps for the site.

In accordance with WAC NR 716.14, Ramboll will prepare brief notification letters with sampling results to the WDNR and property owner; however, we would like to request additional time for data notification given the need to perform a Quality Assurance review of the PFAS data. We would like to request 15 business days of receiving the laboratory analytical report to submit the WAC NR 716.14 data transmittal.

6. IMPLEMENTATION SCHEDULE

The field investigation activities described in Section 5, will be initiated within 60 days following receipt of WDNR approval of this Work Plan. As is typical with most site investigations of this size, the work will be conducted in phases allowing for the initial data to be gathered to help guide the next steps. A preliminary schedule for the investigation activities are provided below:

Work Plan Section Reference	Task	Schedule
5.1.1	Prepare Site Health and Safety Plan.	April 2021
5.1.2	Develop comprehensive data tables with historic site investigation data compared to current standards.	Ongoing
5.1.3	Initiate access request for two off-site wells OMPZ3 and OMPZ4.	Within 30 days of WDNR approval of Work Plan
5.2	Basement Subfloor Drainage System Assessment	Initiate with 45 days of WDNR approval of Work Plan
5.3	Perform Baseline Groundwater Sampling.	Initiate within 60 days of Work Plan Approval and After Access is Secured to OMPZ3 and OMPZ4.
5.3/5.4.3	Confirm groundwater flow direction and contaminant distribution. Notify the WDNR of any significant changes to proposed soil boring/monitoring well installation program based on the baseline groundwater results and comprehensive data table preparation.	Complete within 45 days of receipt of baseline groundwater sampling results.
5.4.2	Soil Borings/MW/Piezometer Installation. Abandonment of MW-4, MW-6, and MW-7.	Summer/Fall 2021
5.4.3	Groundwater Sampling Event (new and existing wells).	To be initiated within 1 to 2 weeks following well installation and development and at least 90 days after the baseline groundwater monitoring event.
5.4.4	Vapor Intrusion Investigation	Winter 2021
5.6	Site Investigation Report	60 days after substantial completion of the site investigation

Please note that the above schedule assumes that weather and site conditions are suitable for effective performance of the field investigation activities. Ramboll will keep the WDNR Project Manager apprised of any delays that are outside of Ramboll and/or NOC's control.

7. REFERENCES

- OMNNI. 2015. Groundwater Investigation for Chlorinated Solvent Contamination. November 5.
- SEH. 2006. Site Investigation Report. August 21.
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- SEH. 2011. Third Stage Site Investigation Report. January 17.
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- Stantec. 2020. Phase I Environmental Site Assessment. May 7.
- Stantec. 2020. Focused Phase II Environmental Site Assessment. August 11.
- TEMCO. 2002. Phase II Environmental Site Assessment. August.
- WDNR. 2003. Consensus – Based Sediment Quality Guidelines; Recommendations for Use and Application. December.
- WDNR. 2020. Site Investigation Review for VPLE – Not Approved. October 7.
- Zaporozec, A. and R. D. Cotter. 1985. Major Groundwater Units of Wisconsin. Wisconsin Geological and Natural History Survey.

TABLES

TABLE 1: Sampling and Analysis Plan Summary

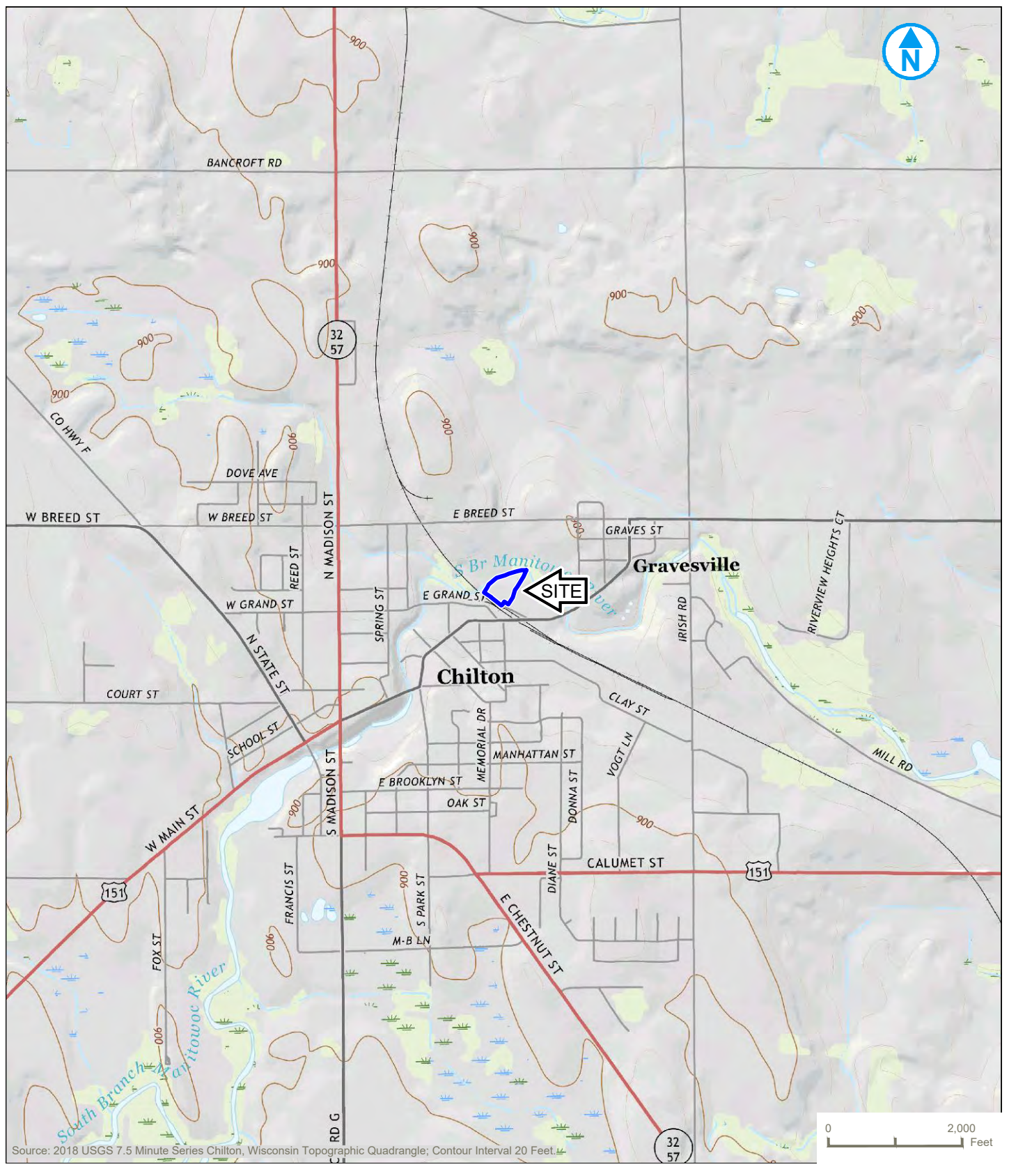
Former Mirro Plant No. 20
Chilton, WI

Sample Location	Property Location	Sample/Well Type	Area	Sample Media	Soil Parameters			Groundwater Parameters				Rationale/Comment
					VOCs	PAHs	Metals	VOCs	PAHs	Metals	PFAS	
MW-11	On Site	Monitoring Well	Northeast Property Boundary	Soil and Groundwater	X		X	X	X	X	X	Investigate on site lead groundwater pathway exceedances in surface samples collected near the Manitowoc River.
MW-12	On Site	Monitoring Well	North Property Boundary	Groundwater (Soil collected at SB/PZ-12)				X	X	X	X	Investigate on site groundwater concentrations along the northern property boundary north of well nest MW-10/PZ-10.
PZ-12	On Site	Piezometer	North Property Boundary	Soil and Groundwater	X		X	X	X	X	X	Investigate on site groundwater concentrations along the northern property boundary north of well nest MW-10/PZ-10.
MW-13	On Site	Monitoring Well	Eastern Property Boundary	Groundwater (Soil collected at SB/PZ-13)				X	X	X	X	Investigate on site groundwater concentrations along the eastern property boundary east of well nest MW-8/PZ-8.
PZ-13	On Site	Piezometer	Eastern Property Boundary	Soil and Groundwater	X			X	X	X	X	Investigate on site groundwater concentrations along the eastern property boundary east of well nest MW-8/PZ-8.
SB-100	On Site	Soil Boring	Well MW-7	Soil	X	X						Delineate elevated PAH concentrations in soil observed during installation of MW-7.
SB-101	On Site	Soil Boring	Well Nest MW-10/PZ-10	Soil	X							Delineate elevated PCE concentrations in soil observed during installation of PZ-10.
SB-102	On Site	Soil Boring	Well Nest MW-10/PZ-10	Soil	X							Delineate elevated PCE concentrations in soil observed during installation of PZ-10.
SB-103	On Site	Soil Boring	Well Nest MW-10/PZ-10	Soil	X							Delineate elevated PCE concentrations in soil observed during installation of PZ-10.
SB-104	On Site	Soil Boring	Well Nest MW-10/PZ-10	Soil	X							Delineate elevated PCE concentrations in soil observed during installation of PZ-10.
SB-105	On Site	Soil Boring	Well MW-4	Soil	X	X						Delineate elevated PAH concentrations in soil observed during installation of MW-4.
SB-106	On Site	Soil Boring	Well MW-4	Soil	X	X						Delineate elevated PAH concentrations in soil observed during installation of MW-4.
SB-107	On Site	Soil Boring	Well MW-4	Soil	X	X						Delineate elevated PAH concentrations in soil observed during installation of MW-4.
SB-108	Off Site	Soil Boring	Well MW-4	Soil	X	X						Delineate elevated PAH concentrations in soil observed during installation of MW-4.

Notes:

Metals include the 8 RCRA Metals
 PFAS include the Wisconsin 36 analyte list recommended by WDNR
 VOCs - volatile organic compounds.
 PAHs - polycyclic aromatic hydrocarbons.
 PFAS - per- and polyfluoroalkyl substances.
 PCE - tetrachloroethene.
 MW - monitoring well.
 PZ - piezometer.
 SB - soil boring.

FIGURES



Map Scale: 1:24,000 | Map Center: 44°2'3.6672", -88°9'12.6648"

SITE LOCATION

FIGURE 1

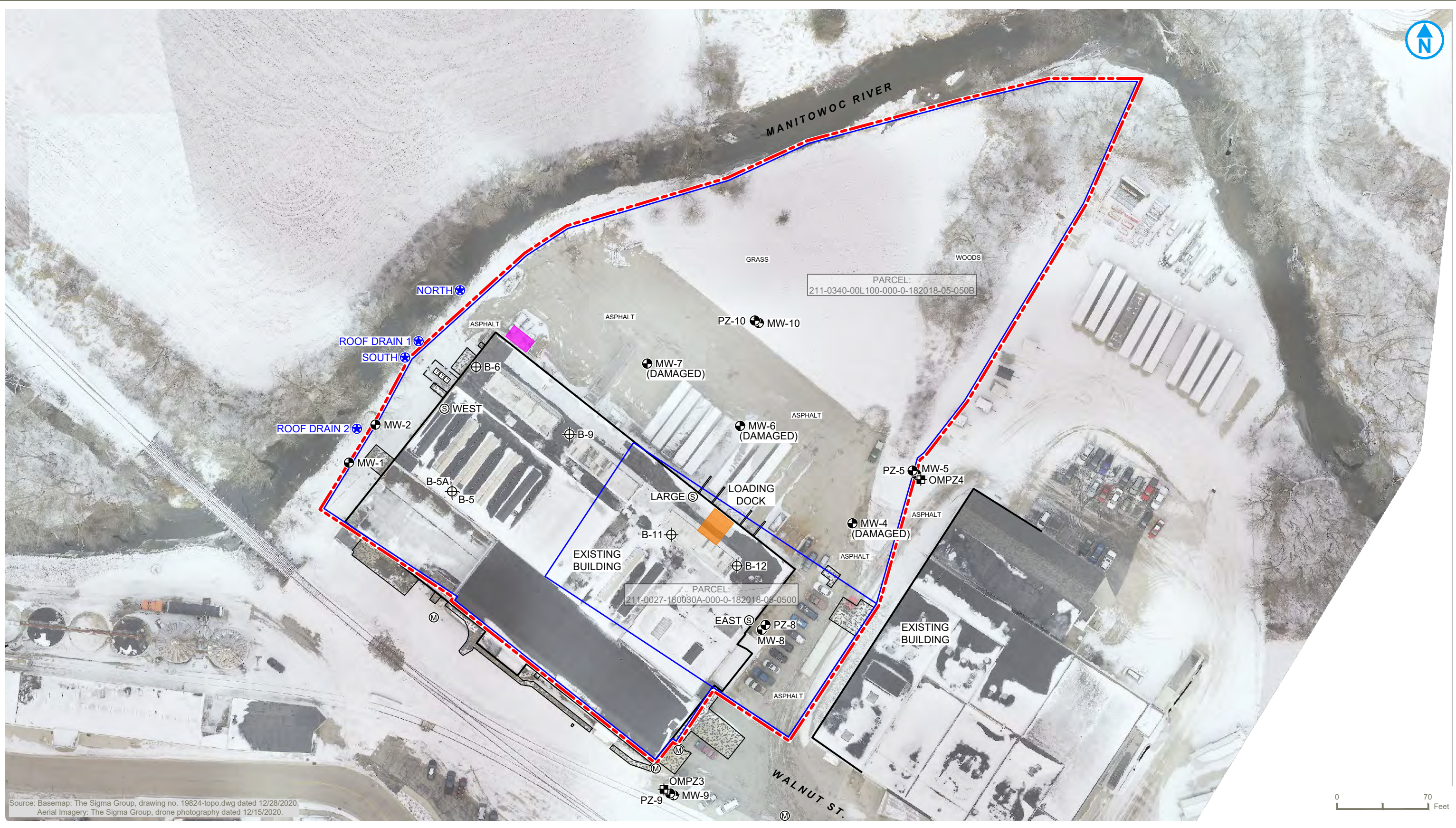


KEY MAP

NEWELL OPERATING COMPANY
FORMER MIRRO PLANT NO. 20
 44 WALNUT STREET
 CHILTON, WISCONSIN

RAMBOLL US CONSULTING, INC.
 A RAMBOLL COMPANY





Source: Basemap: The Sigma Group, drawing no. 19824-topo.dwg dated 12/28/2020.
Aerial Imagery: The Sigma Group, drone photography dated 12/15/2020.

LEGEND

- - - PROPERTY BOUNDARY
- PARCEL BOUNDARY
- GROUNDWATER MONITORING WELL
- TEMPORARY MONITORING WELL
- PIEZOMETER INSTALLED BY OMNNI/WDNR
- SUMP PIT
- MANHOLE
- OUTFALL
- TRANSFORMER
- CHAIN LINK FENCE
- CONCRETE AREA

- APPROXIMATE LOCATION OF MINERAL SPIRITS USTs REMOVED IN OCTOBER 1990 (CLOSED BRRTS 09-08-294564)
- APPROXIMATE LOCATION OF FORMER FUEL USTs ABANDONED IN PLACE IN JANUARY 1996 (CLOSED BRRTS 09-08-292322)

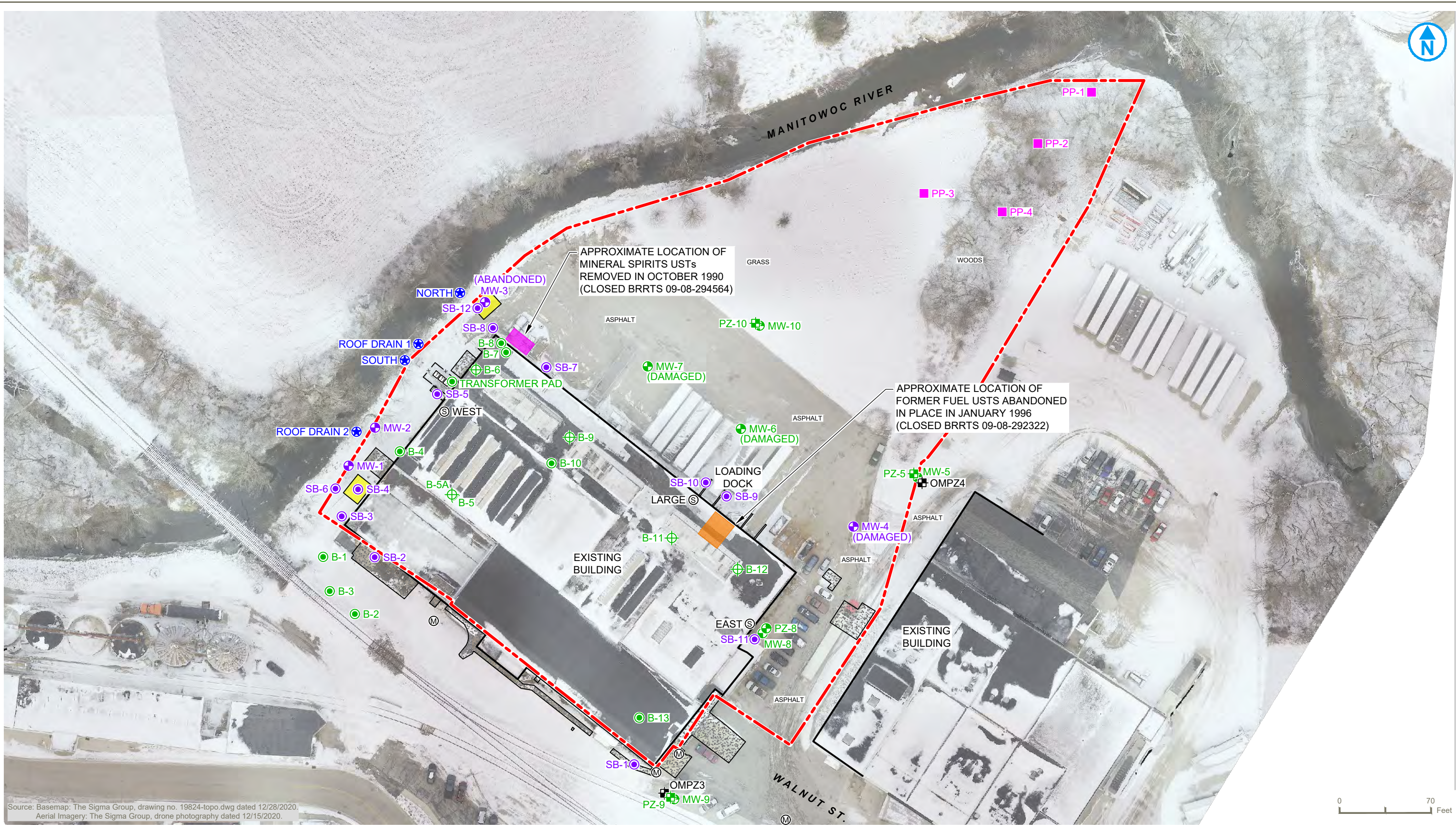
SITE LAYOUT AND EXISTING MONITORING WELL NETWORK

**NEWELL OPERATING COMPANY
FORMER MIRRO PLANT NO. 20**
44 WALNUT STREET
CHILTON, WISCONSIN

FIGURE 2

RAMBOLL US CONSULTING, INC.
A RAMBOLL COMPANY





Source: Basemap: The Sigma Group, drawing no. 19824-topo.dwg dated 12/28/2020.
Aerial Imagery: The Sigma Group, drone photography dated 12/15/2020.

LEGEND

- - - PROPERTY BOUNDARY
- + GROUNDWATER MONITORING WELL (INSTALLED BY SEH)
- + GROUNDWATER MONITORING WELL (INSTALLED BY TEMCO)
- o SOIL BORING (INSTALLED BY SEH)
- o SOIL BORING (INSTALLED BY TEMCO)
- + TEMPORARY WELL (INSTALLED BY SEH)
- + (ABANDONED)
- + NORTH
- + SOUTH
- + WEST
- + EAST
- + LARGE
- + SUMP PIT
- + MANHOLE
- + PIEZOMETER (INSTALLED BY SEH)
- + PIEZOMETER (INSTALLED BY SEH)
- + SURFACE SOIL SAMPLE (INSTALLED BY STANTEC)
- + OUTFALL
- + TRANSFORMER
- + CHAIN LINK FENCE
- CONCRETE AREA
- EXCAVATION LIMITS (COMPLETED BY SEH)

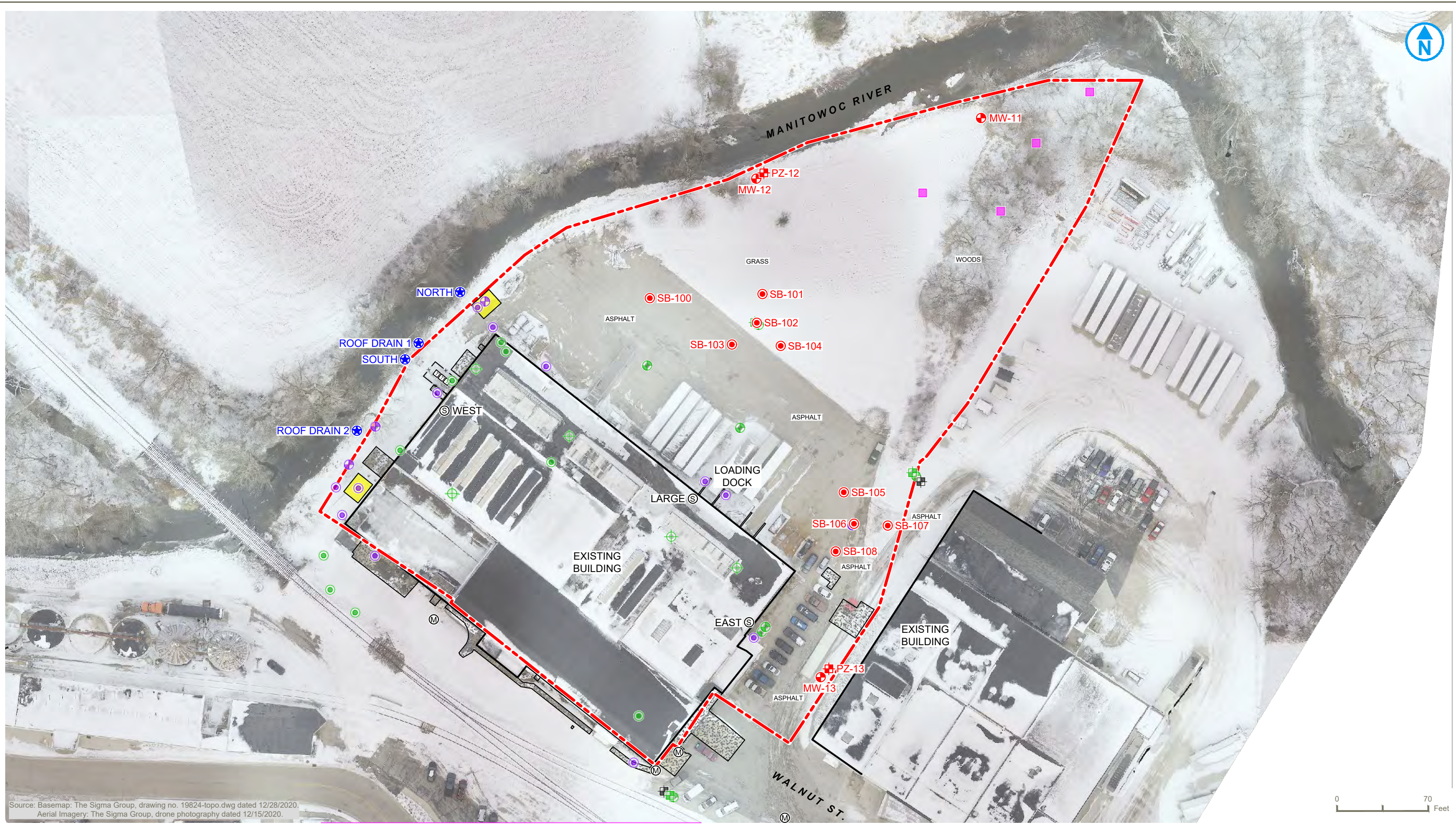
HISTORIC SAMPLING LOCATIONS

**NEWELL OPERATING COMPANY
FORMER MIRRO PLANT NO. 20**
44 WALNUT STREET
CHILTON, WISCONSIN

FIGURE 3

RAMBOLL US CONSULTING, INC.
A RAMBOLL COMPANY





Source: Basemap: The Sigma Group, drawing no. 19824-topo.dwg dated 12/28/2020.
Aerial Imagery: The Sigma Group, drone photography dated 12/15/2020.

LEGEND

--- PROPERTY BOUNDARY

- + GROUNDWATER MONITORING WELL (INSTALLED BY SEH)
- + GROUNDWATER MONITORING WELL (INSTALLED BY TEMCO)
- SOIL BORING (INSTALLED BY SEH)
- SOIL BORING (INSTALLED BY TEMCO)
- + TEMPORARY WELL (INSTALLED BY SEH)

+ PIEZOMETER (INSTALLED BY OMNI/WDNR)

- + PIEZOMETER (INSTALLED BY SEH)
- + SURFACE SOIL SAMPLE (INSTALLED BY STANTEC)
- + OUTFALL
- ⊙ SUMP PIT
- M MANHOLE
- T TRANSFORMER

— x — CHAIN LINK FENCE

- CONCRETE AREA
- EXCAVATION LIMITS (COMPLETED BY SEH)
- PROPOSED SOIL BORING
- + PROPOSED MONITORING WELL
- + PROPOSED PIEZOMETER

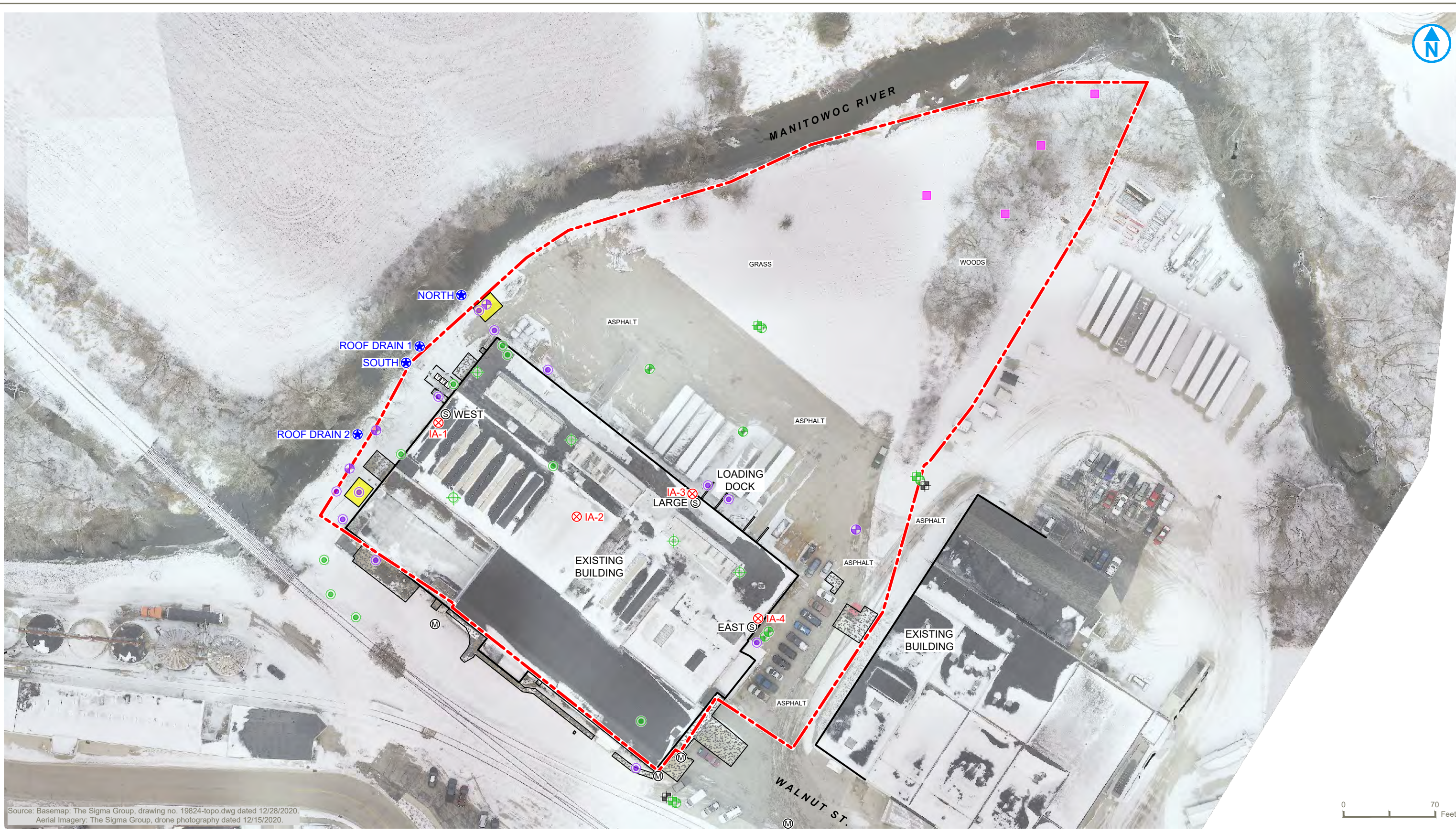
PROPOSED SOIL BORING AND MONITORING WELL LOCATIONS

NEWELL OPERATING COMPANY
FORMER MIRRO PLANT NO. 20
44 WALNUT STREET
CHILTON, WISCONSIN

FIGURE 4

RAMBOLL US CONSULTING, INC.
A RAMBOLL COMPANY





Source: Basemap: The Sigma Group, drawing no. 19824-topo.dwg dated 12/28/2020.
Aerial Imagery: The Sigma Group, drone photography dated 12/15/2020.



LEGEND

- - - PROPERTY BOUNDARY
- + GROUNDWATER MONITORING WELL (INSTALLED BY SEH)
- + GROUNDWATER MONITORING WELL (INSTALLED BY TEMCO)
- o SOIL BORING (INSTALLED BY SEH)
- o SOIL BORING (INSTALLED BY TEMCO)
- + TEMPORARY WELL (INSTALLED BY SEH)
- + PIEZOMETER (INSTALLED BY OMNNI/WDNR)
- + PIEZOMETER (INSTALLED BY SEH)
- + SURFACE SOIL SAMPLE (INSTALLED BY STANTEC)
- + OUTFALL
- o SUMP PIT
- M MANHOLE
- TRANSFORMER
- x CHAIN LINK FENCE
- CONCRETE AREA
- EXCAVATION LIMITS (COMPLETED BY SEH)
- X PROPOSED INDOOR AIR SAMPLE LOCATION

PROPOSED INDOOR AIR SAMPLE LOCATIONS

NEWELL OPERATING COMPANY
FORMER MIRRO PLANT NO. 20
44 WALNUT STREET
CHILTON, WISCONSIN

FIGURE 5

RAMBOLL US CONSULTING, INC.
A RAMBOLL COMPANY



APPENDIX A

WDNR "SITE INVESTIGATION REVIEW FOR VPLE – NOT APPROVED"



October 07, 2020

Newell Operating Company
Kristin Holloway Jones (Kristin.Jones@newellco.com)
6655 Peachtree Dunwoody Rd
Atlanta GA 30328

Subject: Site Investigation Review for VPLE – Not Approved
Mirro Plt #20 (Former), 44 Walnut Street, Chilton, WI
BRRS #s 02-08-520157 (ERP) & 06-08-426946 (VPLE)

Dear Ms. Jones:

On September 17, 2020, the Department of Natural Resources (DNR) reviewed the site investigation performed at this site for compliance with Wis. Admin. Code ch. NR 716. DNR review and approval of the site investigation is required for sites enrolled in the Voluntary Party Liability Exemption (VPLE) program. After review, the DNR has determined that the site investigation does not meet the requirements of Wis. Admin. Code ch. NR 716 so is NOT APPROVED. The degree and extent of contamination identified at the site has not been adequately characterized or documented.

This review was based on review of the following documents:

- Phase I Environmental Site Assessment (Stantec, 2020),
- Phase II Environmental Site Assessment (Stantec, 2020),
- Comprehensive Site Investigation Report (SEH, 2020), and
- PFOA/PFOS Groundwater Sample Results (SEH, 2018).

The DNR identified the following items as needing additional work to complete the site investigation:

1. The property boundaries need to be confirmed and site figures updated.
 - It appears that well nests MW-5/PZ-5 and MW-9/PZ-9 are located on neighboring properties. Additionally, sample locations B-1 to B-3 and SB-1 and SB-2 appear to be located on neighboring properties.
 - It appears that the area between the former Mirro Plt #20 building and the railroad is not part of the former Mirro Plt #20 property.
 - The creation of a certified survey map of the parcel including monitoring well locations is recommended
 - Responsible Party (RP) letters may need to be issued to neighboring property owners for the contamination identified on their property.
2. Additional soil sampling is necessary to define the degree and extent of soil contamination on-site. Soil sampling performed by Stantec in 2020 identified contamination on the undeveloped northern portion of the site. A soil sampling plan to fill in sampling gaps to the north and south of the building is needed for contaminants of concern. This work is partly dependent on the property boundaries determination.
3. PCBs were detected in soil at B-10 above groundwater pathway RCL. Clarify why sample was collected and identify source(s). Additional sampling should be evaluated.
4. Additional groundwater monitoring well locations are needed to define the degree and extent of contamination.
 - A piezometer north of PZ-10.

- A piezometer side gradient (east) of PZ-5.
 - A groundwater monitoring well and piezometer side gradient (east) of MW-8 near property line.
5. A standalone off-site exemption request for chlorinated volatile organic compounds (CVOCs) in groundwater will be required. This request is contingent on select piezometers being on the former Mirro #20 property. An offsite exemption requires showing contaminant impact on property owned by requester. Assumed contamination is not eligible for an exemption.
 6. The perfluoroalkyl and polyfluoroalkyl substances (PFAS) investigation is not complete. Additional information regarding site plating process and use of PFAS is needed.
 7. A sediment investigation in the Manitowoc River is warranted for contaminants of concern based on sludge sample results collected from the wastewater/sump system which discharges to the river.
 8. A surface water investigation/evaluation is warranted for contaminants of concern based on site investigation data. There is a likelihood of a PFAS discharge to the Manitowoc River via groundwater and the sump system.
 9. The identified sludge in the wastewater/sump system requires immediate attention due to potential surface water discharge. The sludge should be removed, and the wastewater/sump system evaluated and modified to minimize the sludge/groundwater contaminant discharge.
 10. A vapor intrusion investigation is required.
 11. Tables need to be updated with current industrial, non-industrial and groundwater protection residual contaminant levels (RCLs) and groundwater standards.
 12. Location of former transformer pad(s) and sample locations should be added to site figures.
 13. The data provided in the two Stantec reports should be added to future submittals.

A site investigation work plan in accordance with Wis. Admin. Code § NR 716.09 should be submitted to the DNR within 60 days to address the issues identified above.

If you have questions regarding this letter please contact me a 920-808-0170 or via email at kevin.mcknight@wisconsin.gov.

Sincerely,



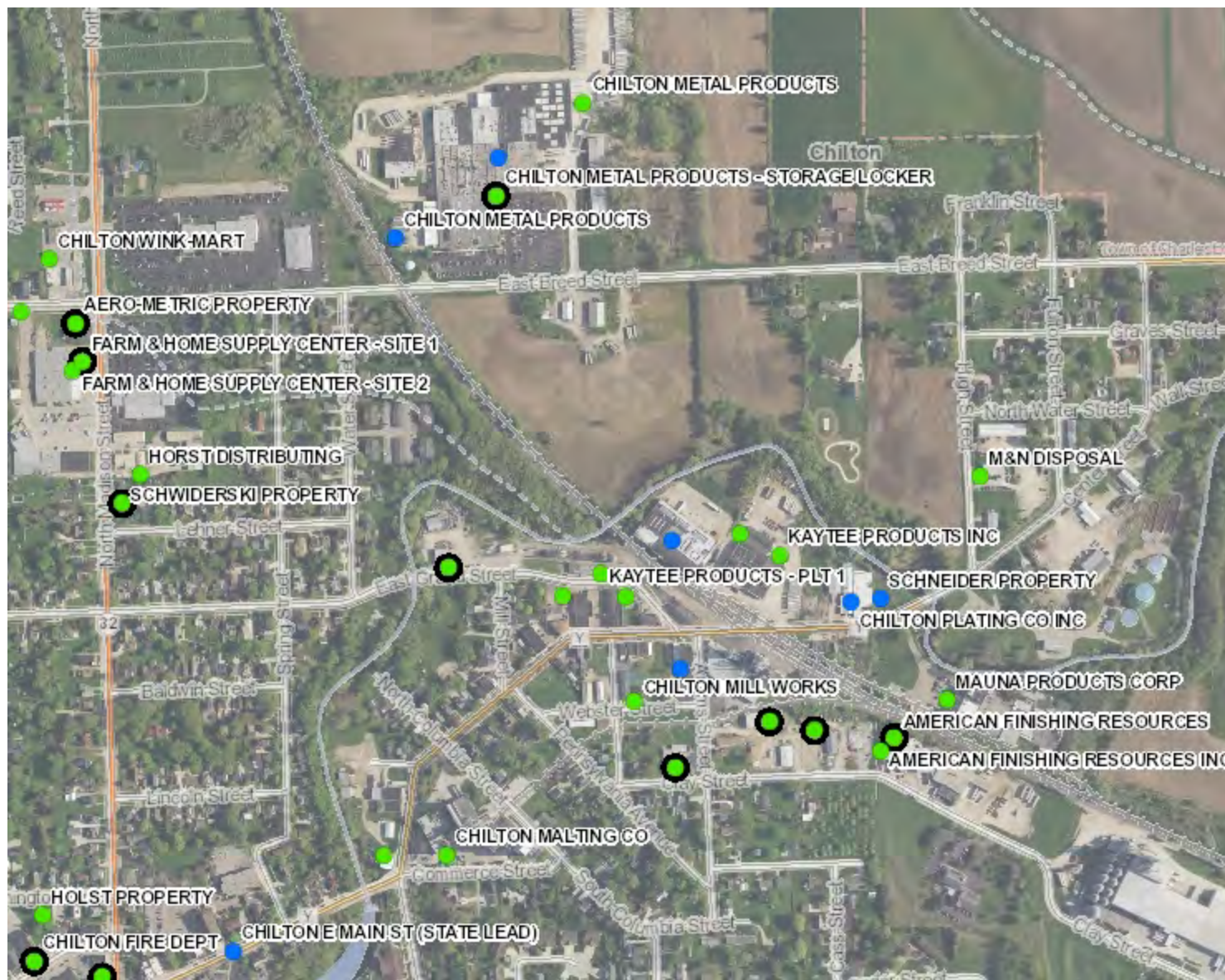
Kevin D. McKnight
Hydrogeologist
Remediation and Redevelopment Program

cc: Tom Nordgren (tom.nordgren@ki.com)
Hudson Green, Patriot Environmental Management, LLC (hgreen@patriotenviro.com)
Bruce Olson, SEH (bruce.olson@seh.com)
John Guhl, SEH (john.guhl@seh.com)

APPENDIX B
BRRTS MAP



Map Title



Legend

- Open Site
- Closed Site
- Continuing Obligations Apply
- Facility-wide Site



NAD_1983_HARN_Wisconsin_TM

1:7,920



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

Note: Not all sites are mapped.

Notes

APPENDIX C

OMNI 2015 INVESTIGATION INFORMATION

Table 2 - Results of Groundwater Analysis of PCE/TCE/DCE/VC
Monitoring Well and Piezometer Samples

INFORMATION SOURCE:

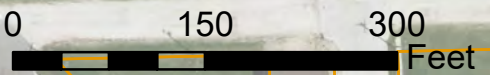
Groundwater Investigation for Chlorinated Solvent Contamination (OMNNI, November 2015).

Site	Well	Alias	Date	Tetrachloroethene (PCE)	Trichloroethene (TCE)	cis-1,2-Dichloroethene	trans-1,2-Dichloroethene	Vinyl Chloride
				Result (ug/L)				
			PAL	0.5	0.5	7	20	0.02
			ES	5	5	70	100	0.2
Larson Cleaners	LCMW01	MW-1	11/5 - 11/6/2013	11.6	< 0.33	< 0.38	< 0.35	< 0.18
	LCMW02	MW-2		63,000	307	< 0.38	< 0.35	< 0.18
	LCMW03	MW-3		57,000	1,470	292	70 J	< 0.18
	LCMW04	MW-4		0.70 J	< 0.33	< 0.38	< 0.35	< 0.18
	LCMW05	MW-5		760	145	290	13.2	3.2
	LCMW06	MW-6		6.4	1.06	1.7	< 0.35	< 0.18
	LCMW07	MW-7		530	21	14.1	0.87 J	< 0.18
	LCMW08	MW-8		9,400	276	33	13.9	0.39 J
	LCMW09	MW-9		< 0.33	< 0.33	< 0.38	< 0.35	< 0.18
	LCMW10	MW-10		1.02 J	1.02	47	3.01	0.33 J
	LCPZ01	PZ-1	21.2	24.5	1.21	< 0.35	< 0.18	
	LCPZ02	PZ-2	237	228	16.1	2.32	0.32 J	
	LCPZ03	PZ-3	480	213	17.2	1.41	< 0.18	
	LCPZ04	PZ-4	< 0.33	< 0.33	< 0.38	< 0.35	< 0.18	
	LCPZ05***	OMPZ1	3/11/2015	7.3	< 0.47	< 0.45	< 0.54	< 0.17
	LCPZ06***	OMPZ2		12.2	57	34	0.93 J	< 0.17
	LCPZ07***	OMPZ5		2.07 J	< 0.47	< 0.45	< 0.54	< 0.17
Mirro No. 20	MIPZ05	PZ-5	11/5/2013	< 0.33	< 0.33	4.9	< 0.35	0.61
	MIPZ09	PZ-9	3/11/2015	256	239	280	3.3	0.49 J
	MIPZ10***	OMPZ3		25.5	26.6	86	3.3	< 0.17
	MIPZ11***	OMPZ4		< 0.74	< 0.47	< 0.45	< 0.54	< 0.17
Chilton Plating / Gordon Schneider	CPMW02	MW-2	11/5 - 11/6/2013	1.35	62	22.6	0.53 J	< 0.18
	CPMW03	MW-3		< 0.33	49	15.5	2.6	< 0.18
	CPMW04A	MW-4A		3.5	< 0.33	< 0.38	< 0.35	< 0.18
	CPPZ04	MW-4		0.35 J	0.35 J	< 0.38	< 0.35	< 0.18
	CPPZ105	MW-105P		< 0.33	< 0.33	< 0.38	< 0.35	< 0.18
	GSMW103	MW-103		0.48 J	0.55 J	1.53	< 0.35	< 0.18
	GSPZ103	MW-103P		< 0.33	< 0.33	< 0.38	< 0.35	< 0.18
	CCMW104	MW-104		< 0.33	< 0.33	< 0.38	< 0.35	< 0.18
	CCPZ104	MW-104P		< 0.33	< 0.33	< 0.38	< 0.35	< 0.18
	CPPZ05***	OMPZ6	3/11/2015	< 0.74	< 0.47	< 0.45	< 0.54	< 0.17
Chilton Metal	CMMW27B	S-27B	11/6/2013	< 0.33	3.3	< 0.38	< 0.35	< 0.18
	CMMW29B	S-29B		< 0.33	105	< 0.38	< 0.35	< 0.18
	CMMW29C	S-29C		< 0.33	20.7	< 0.38	< 0.35	< 0.18
Monitoring Wells East of River	CCMW101	MW-101	11/5/2013	< 0.33	< 0.33	< 0.38	< 0.35	< 0.18
	CCMW102	MW-102		< 0.33	< 0.33	< 0.38	< 0.35	< 0.18
	CCPZ101	MW-101P		< 0.33	< 0.33	< 0.38	< 0.35	< 0.18
	CCPZ102	MW-102P		< 0.33	< 0.33	< 0.38	< 0.35	< 0.18

*** piezometers installed by OMNNI in 2014

Parcels
 Monitoring Well
 Piezometer
 PCE Isoconcentration (ppb)

NOTE:
Results from observation wells and piezometers are included.



Project Manager: DJB
 Project Engineer: DJB
 Drawn By: JCW
 Checked By: DJB
 Date: 11/5/2015

CHILTON SOLVENT INVESTIGATION
ISOCONCENTRATION MAP OF PCE IN GROUNDWATER (ug/L)
(2013 AND 2015 Sampling Events)
 CITY OF CHILTON
 CALUMET COUNTY, WISCONSIN

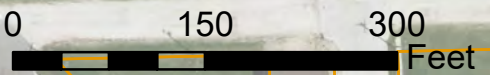
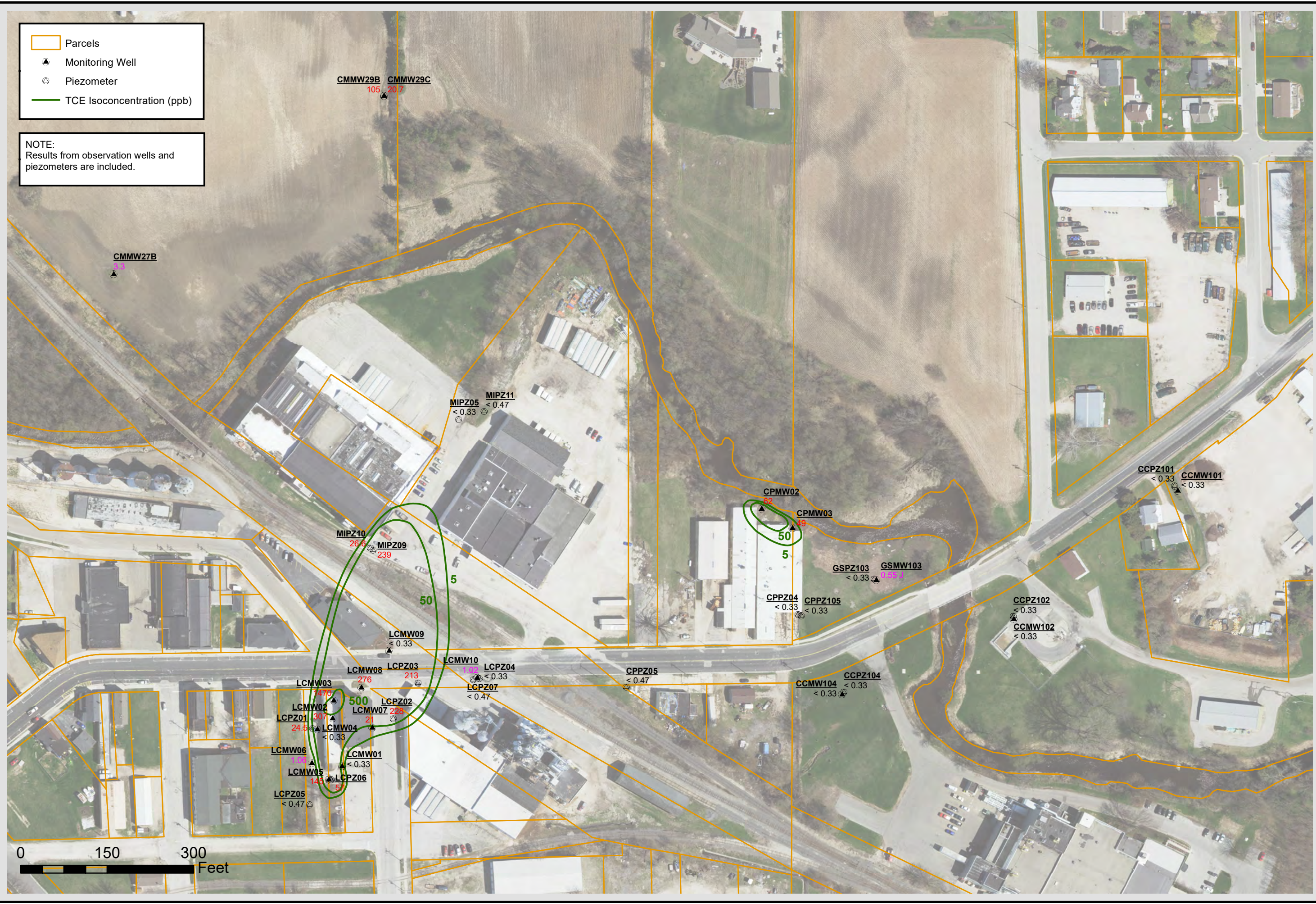


SCALE:
 1" = 150'
 PROJECT NO.
N2148A13
 FIGURE NO.
4

F:\ENV\IRON\2148A13 (WDNR-Chilton)\GIS\IPCE_1311.mxd

Parcels
 Monitoring Well
 Piezometer
 TCE Isoconcentration (ppb)

NOTE:
Results from observation wells and piezometers are included.



Project Manager: DJB
 Project Engineer: DJB
 Drawn By: JCW
 Checked By: DJB
 Date: 11/5/2015

CHILTON SOLVENT INVESTIGATION
ISOCONCENTRATION MAP OF TCE IN GROUNDWATER (ug/L)
(2013 AND 2015 Sampling Events)

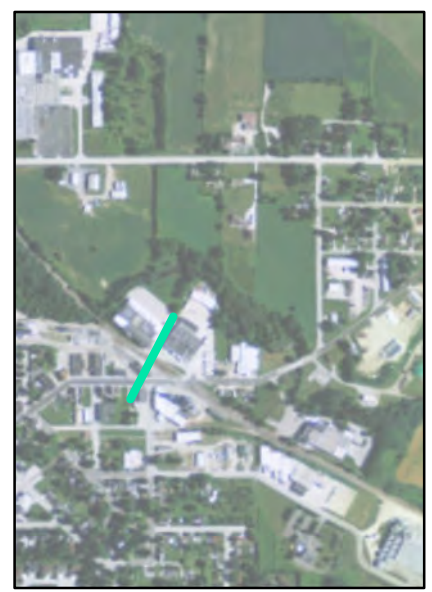
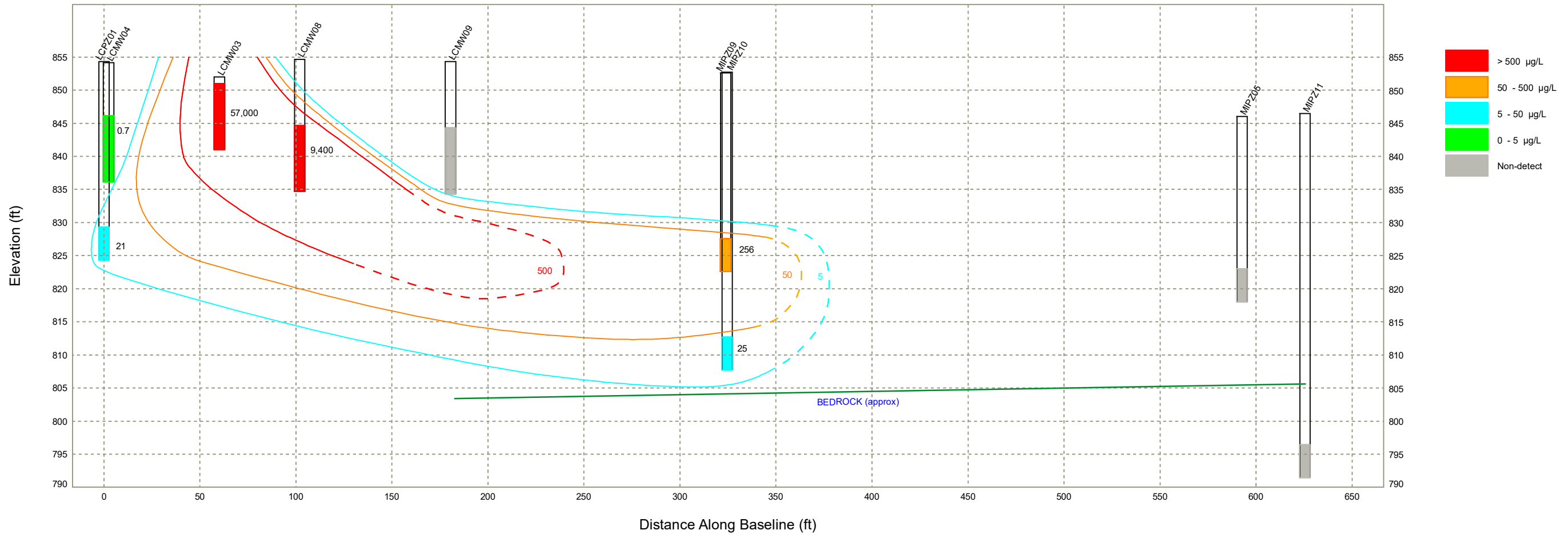
CITY OF CHILTON
 CALUMET COUNTY, WISCONSIN



SCALE:
 1" = 150'
 PROJECT NO.
N2148A13
 FIGURE NO.
5



Project Manager: DJB
 Project Engineer: DJB
 Drawn By: JCW
 Checked By: DJB
 Date: 11/5/2015



CHILTON SOLVENT INVESTIGATION
CROSS-SECTIONAL VIEW OF PCE IN GROUNDWATER
SECTION A-A' (NOVEMBER 5-6, 2013)

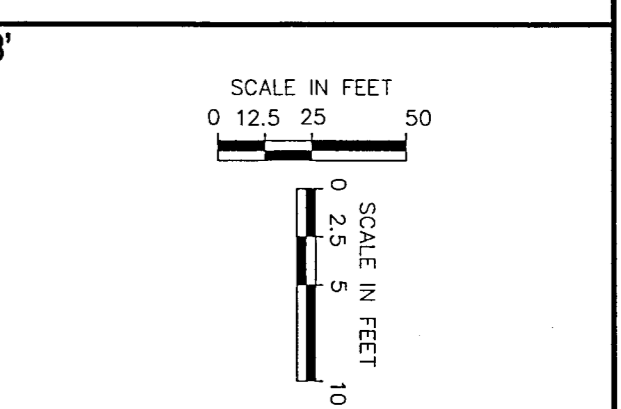
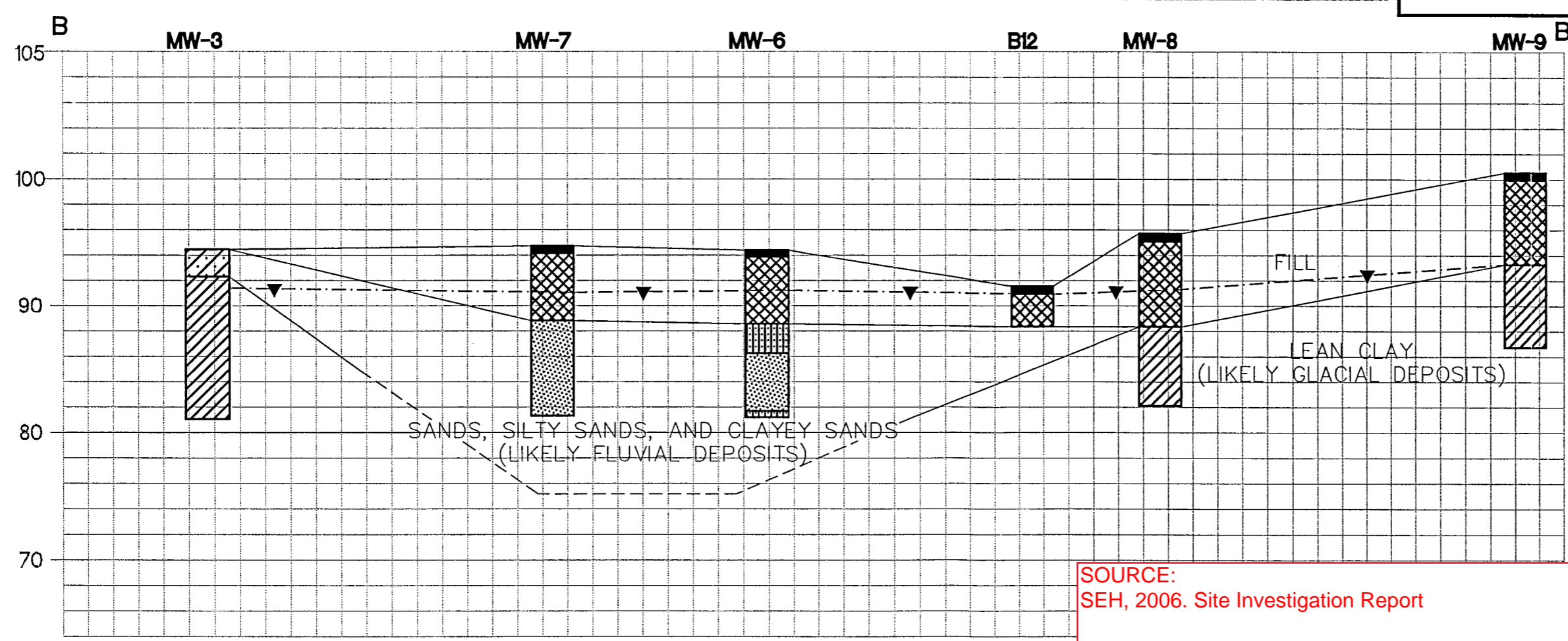
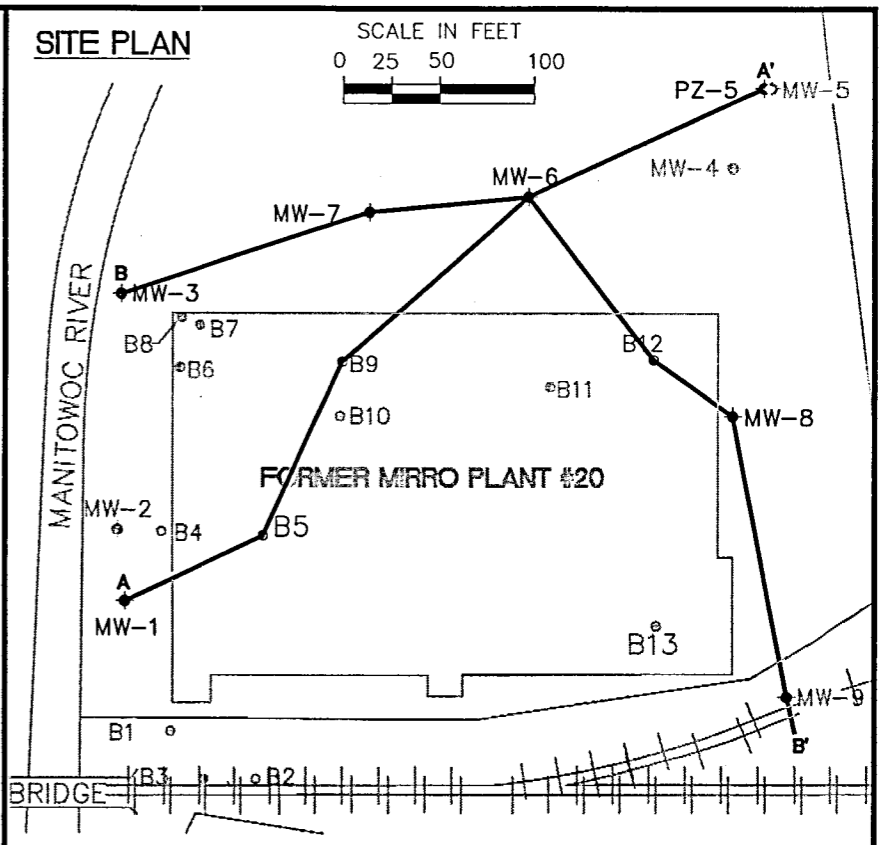
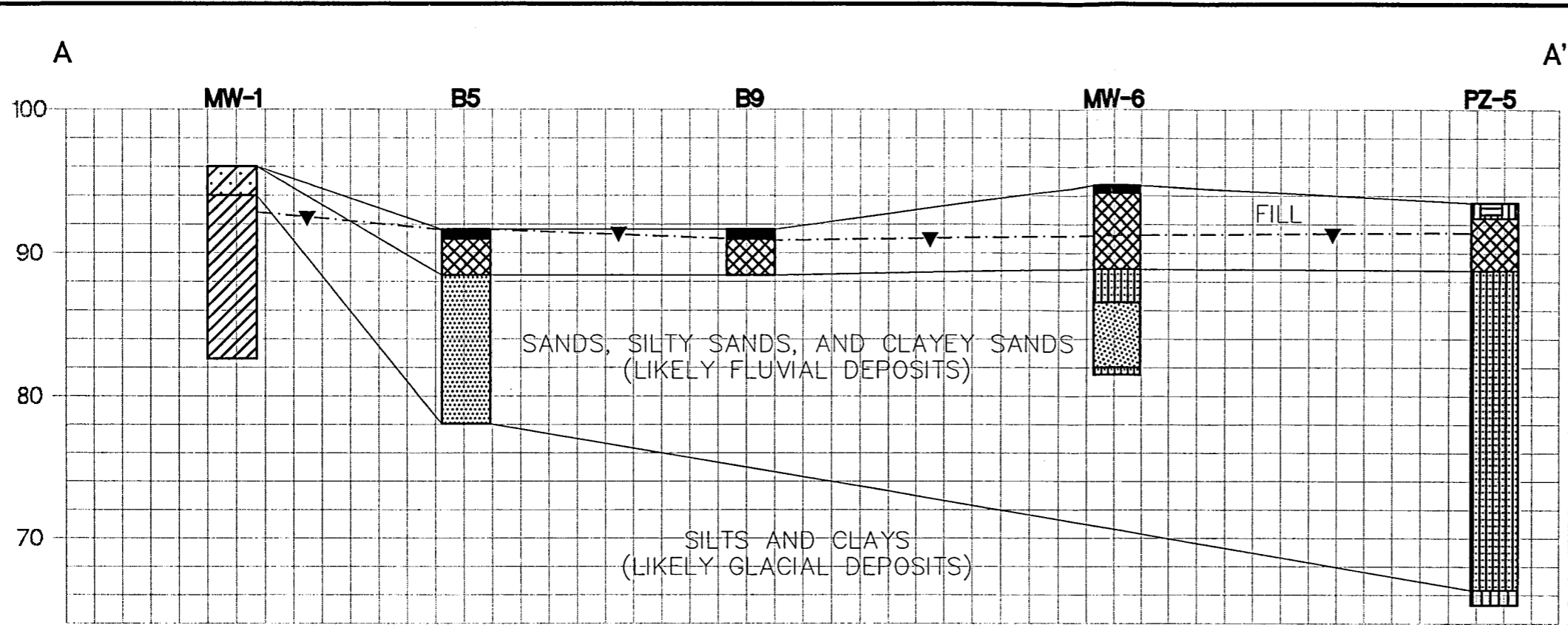
CITY OF CHILTON, CALLUMET COUNTY, WISCONSIN

Omni
 ASSOCIATES
 ONE SYSTEMS DRIVE PHONE (920) 735-6900
 APPLETON, WI 54914 FAX (920) 830-6100

SCALE:
 PROJECT NO.
N2148A14
 FIGURE NO.
6

APPENDIX D

SEH GEOLOGIC CROSS SECTIONS (2006 AND 2013)



- LEGEND:**
- = CONCRETE OR ASPHALT
 - = TOPSOIL
 - = FILL SOILS
 - = SAND (SP)
 - = SILTY SAND (SM)
 - = CLAYEY SAND (SC)
 - = SILT (ML)
 - = LEAN CLAY (CL)
 - = WATER TABLE (5/30/06)

SOURCE:
SEH, 2006. Site Investigation Report

DRAWING DIRECTORY: G:\V01050200\FIGURES\SITE INVESTIGATION REPORT\FIGURE 5 - GEOLOGIC CROSS SECTIONS

1	07/17/06	SITE INVESTIGATION REPORT	RJH	07/06	JEG	07/06	JEG	8/10/06
NO.	DATE	ISSUE/REVISIONS	DRAWN BY	DESIGN	QC CHECK			

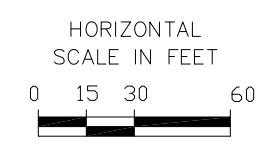
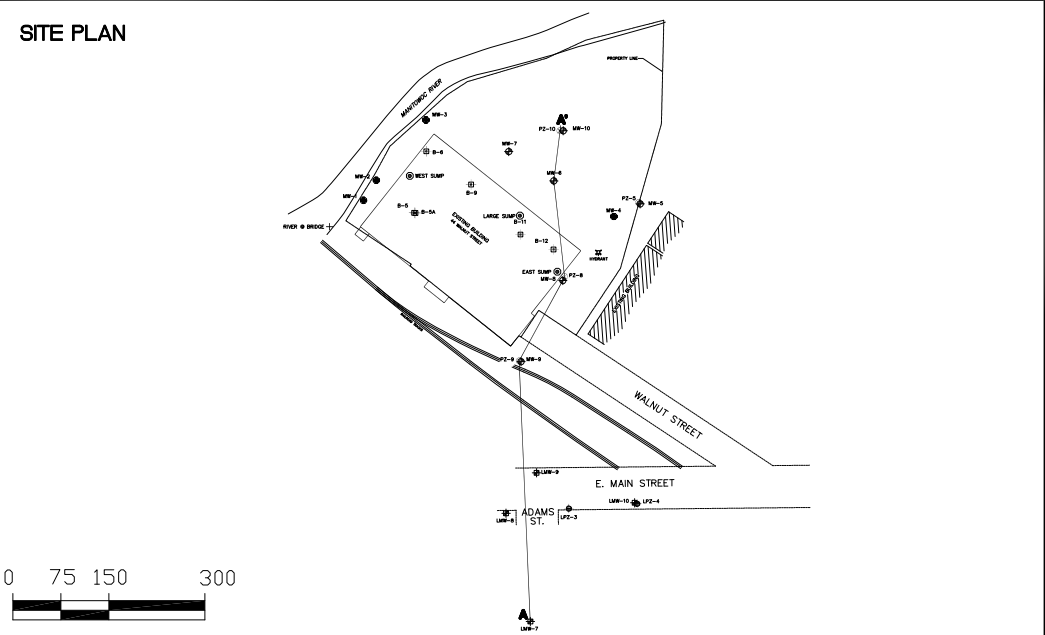
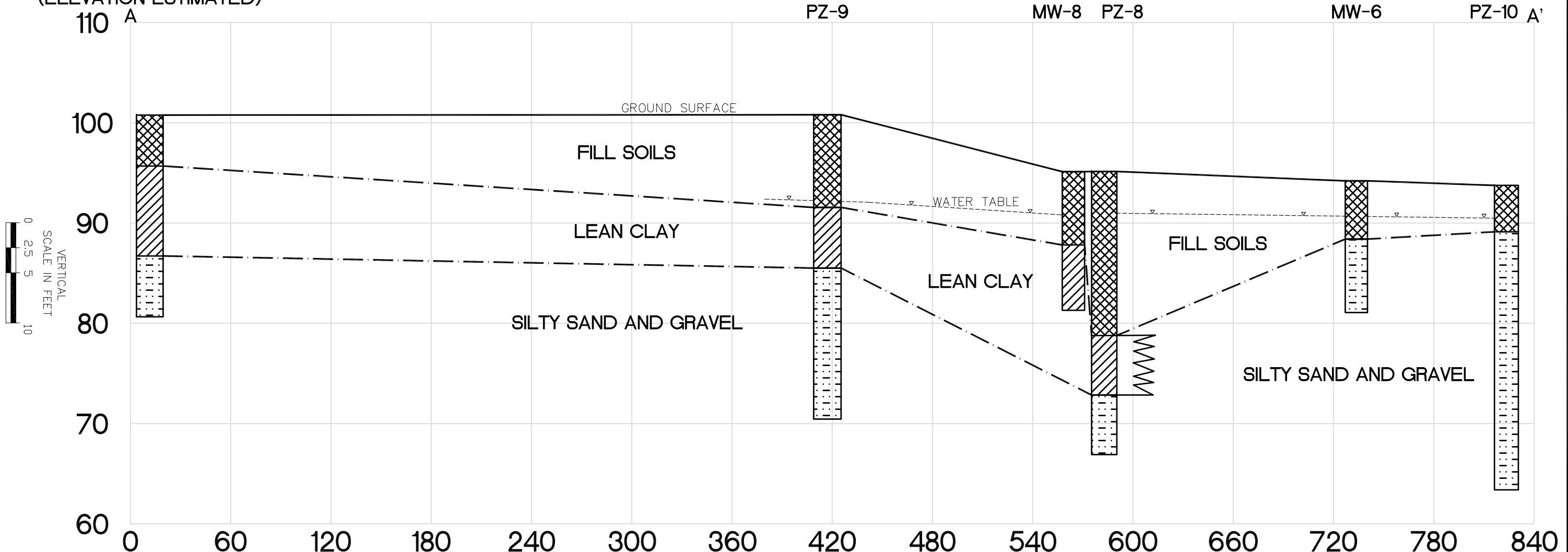


SITE INVESTIGATION REPORT
FORMER MIRRO PLANT #20
CHILTON, WISCONSIN

FIGURE 5
GEOLOGIC CROSS SECTIONS

PROJ. NO. 5
NERUB0502
DATE 07/17/05

LARSON'S
CLEANERS
LMW-7
(ELEVATION ESTIMATED)



SOURCE:
SEH, 2013. Supplemental Site Investigation Report

DRAWING DIRECTORY: SBA\KOV\NERUB\050201\FEB 13 SAMPLING\FIGURES\FIGURE 3 - GEOLOGIC CROSS SECTION

1	05/10/13		RJH	05/13	JEG	05/13	JM	06/13
NO.	DATE	ISSUE/REVISIONS	DRAWN BY	DESIGN	QC CHECK			



**SUPPLEMENTAL SITE INVESTIGATION
FORMER MIRRO PLANT #20
CHILTON, WISCONSIN**

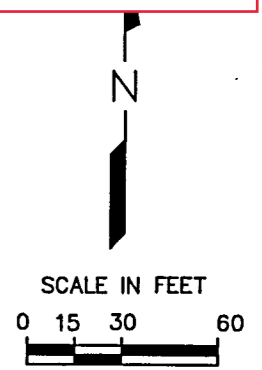
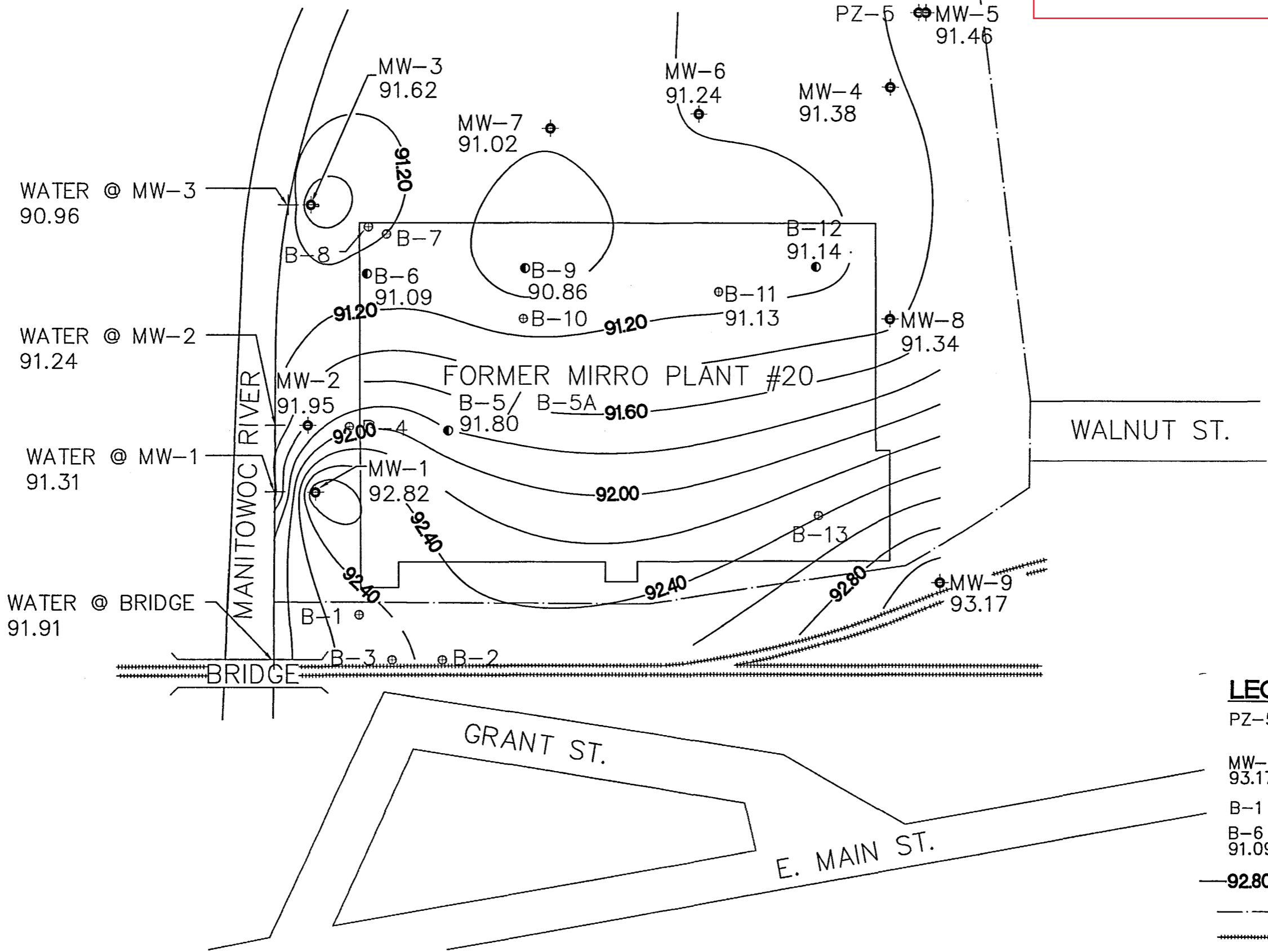
**FIGURE 3
GEOLOGIC CROSS SECTION**

PROJ. NO. NERUB050102	3
DATE 06/07/13	6

APPENDIX E

SEH GROUNDWATER FLOW DIRECTION MAPS (2006, 2008, 2011, AND 2013)

SOURCE:
SEH, 2006. Site Investigation Report



- LEGEND:**
- PZ-5 ⊕ = PIEZOMETER LOCATION AND NUMBER
 - + = MANITOWOC RIVER SURFACE WATER ELEVATION ON 5/30/06 (SITE DATUM)
 - MW-9 ⊕ = MONITORING WELL LOCATION, NUMBER AND GROUNDWATER ELEVATION ON 5/30/06 (SITE DATUM)
 - B-1 ⊕ = SEH SOIL SAMPLE LOCATION AND NUMBER (NO GROUNDWATER DATA)
 - B-6 ⊕ = SEH SOIL SAMPLE LOCATION, NUMBER AND GROUNDWATER ELEVATION ON 5/30/06 (SITE DATUM)
 - 92.80— = GROUNDWATER ELEVATION ISOCONTOUR 5/30/06 (SITE DATUM)
 - - - = APPROX. PROPERTY BOUNDARY
 - ⋯⋯⋯ = RAILROAD TRACKS

DRAWING DIRECTORY: C:\VOL\NERUB\DESIGN\FIGURES\SITE INVESTIGATION REPORT\FIGURE 4 - GROUNDWATER FLOW MAP

1	07/17/06	SITE INVESTIGATION REPORT	RJH	07/06	JEG	07/06	SEH	B/06
NO.	DATE	ISSUE/REVISIONS	DRAWN BY	DESIGN	QC CHECK			

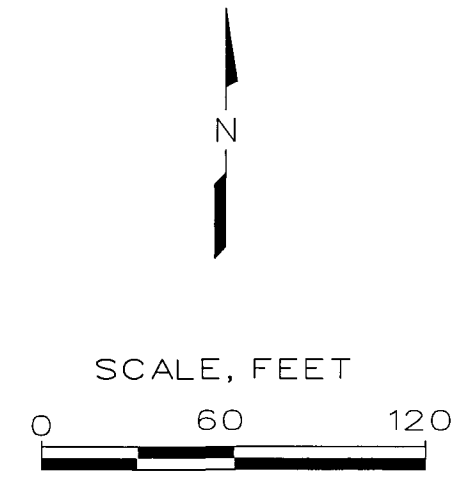
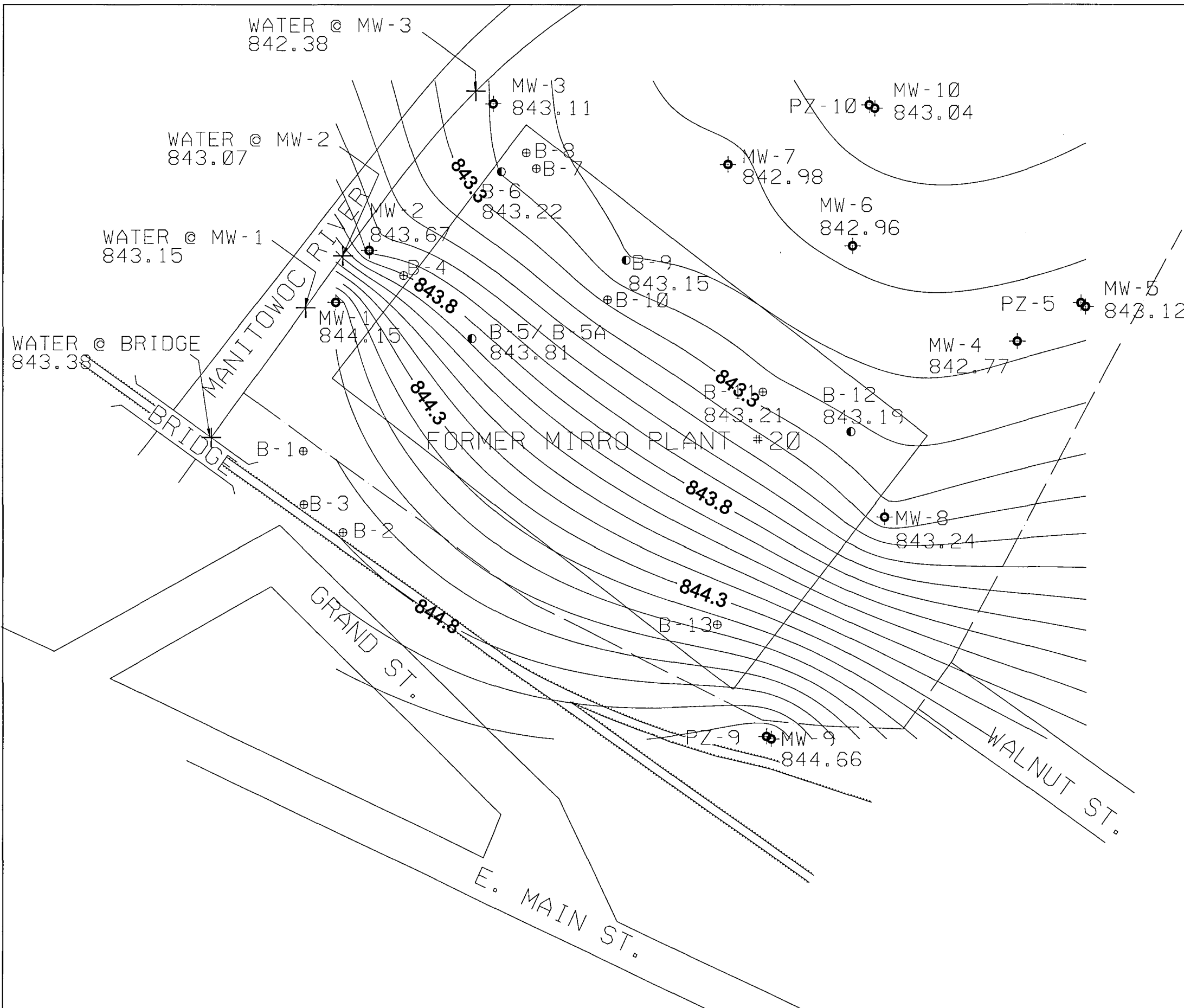


SITE INVESTIGATION REPORT
FORMER MIRRO PLANT #20
CHILTON, WISCONSIN

FIGURE 4
GROUNDWATER FLOW MAP
05/30/2006

PROJ. NO. NERUB050200	4
DATE 07/17/06	5

SOURCE:
SEH, 2008. Additional Site Investigation Report



- LEGEND**
- PZ-5 - PIEZOMETER LOCATION AND NUMBER
 - + - MANITOWOC RIVER SURFACE WATER ELEVATION ON 2/18/08 (MSL)
 - MW-9 - MONITORING WELL LOCATION, NUMBER AND GROUNDWATER ELEVATION ON 2/18/08 (MSL)
 - B-1 - SEH SOIL SAMPLE LOCATION AND NUMBER (NO GROUNDWATER DATA)
 - B-6 - TEMPORARY STANDPIPE LOCATION, NUMBER AND GROUNDWATER ELEVATION ON 2/18/08 (MSL)
 - ~843.8~ - GROUNDWATER ELEVATION ISOCONTOUR ON 2/18/08 (MSL), CONTOUR INTERVAL = 0.1 FT
 - — — - APPROX. PROPERTY BOUNDARY
 - — — — — - RAILROAD TRACKS

1	06/17/08	ASIREPORT	JPF	06 /08	FJM	06 /08		
NO.	DATE	ISSUE/REVISIONS	DRAWN BY	DESIGN	QC	CHECK		

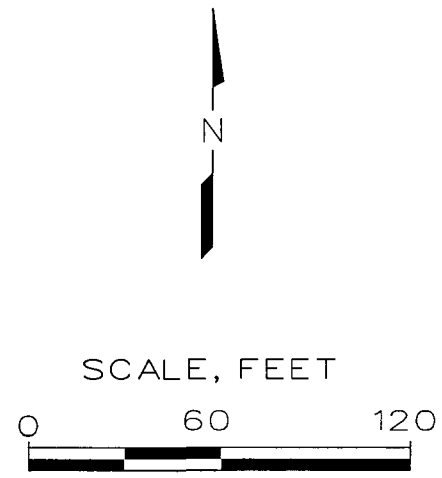
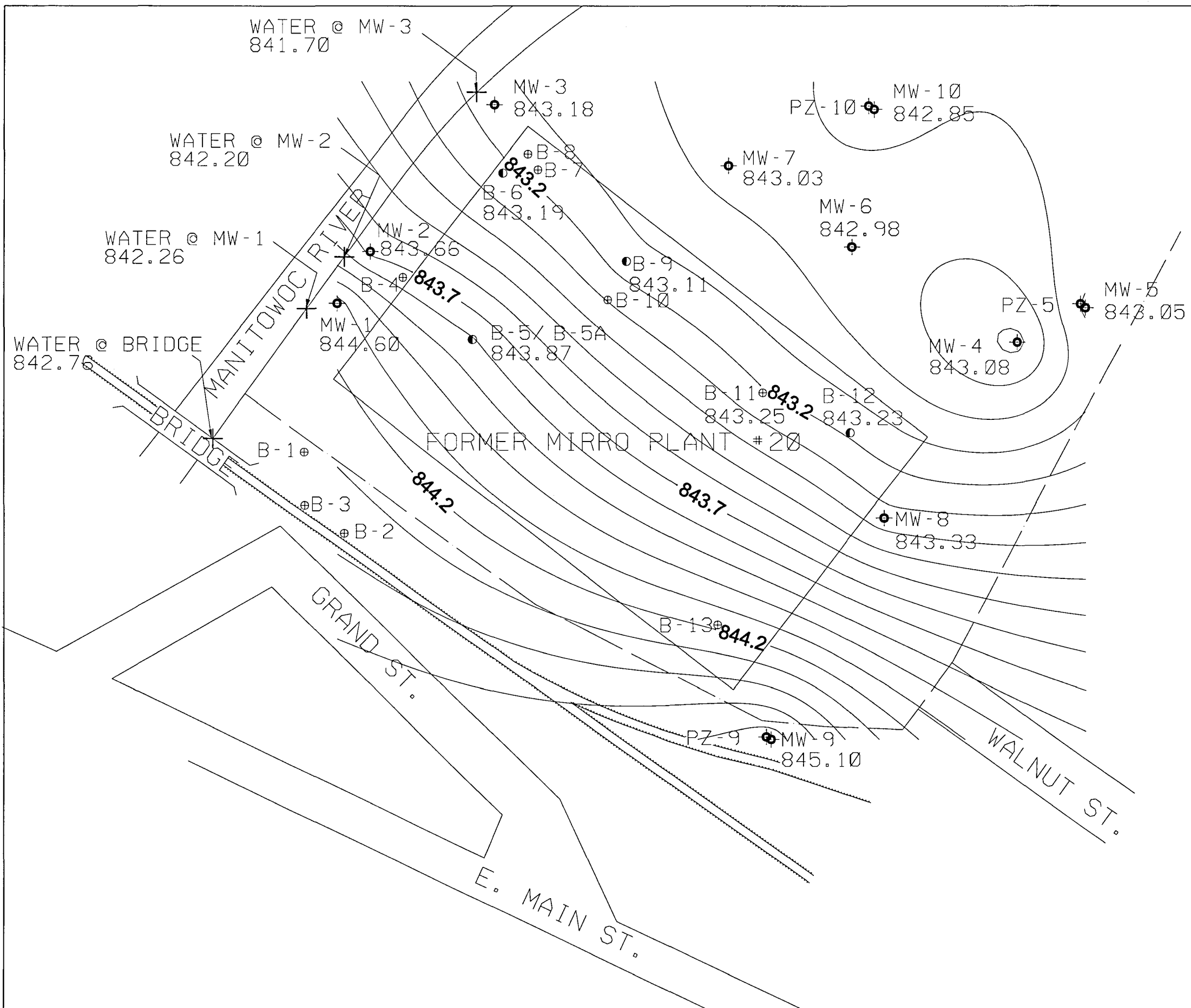


ADDITIONAL SITE INVESTIGATION REPORT
FORMER MIRRO PLANT #20
CHILTON, WISCONSIN

FIGURE 3
GROUNDWATER FLOW MAP
2/18/2008

PROJ. NO. NERUB050201	3
DATE 07/17/06	5

SOURCE:
SEH, 2008. Additional Site Investigation Report



- LEGEND**
- PZ-5 • PIEZOMETER LOCATION AND NUMBER
 - + • MANITOWOC RIVER SURFACE WATER ELEVATION ON 5/21/08 (MSL)
 - MW-9 • MONITORING WELL LOCATION, NUMBER AND GROUNDWATER ELEVATION ON 5/21/08 (MSL)
 - B-1 • SEH SOIL SAMPLE LOCATION AND NUMBER (NO GROUNDWATER DATA)
 - B-6 • TEMPORARY STANDPIPE LOCATION, NUMBER AND GROUNDWATER ELEVATION ON 5/21/08 (MSL)
 - ~843.8~ • GROUNDWATER ELEVATION ISOCONTOUR ON 5/21/08 (MSL), CONTOUR INTERVAL = 0.1FT
 - — — • APPROX. PROPERTY BOUNDARY
 - — — — — • RAILROAD TRACKS

1	07/17/06	ASIREPORT	JPF	07/06	FJM	07/06		
NO.	DATE	ISSUE/REVISIONS	DRAWN BY	DESIGN	QC CHECK			

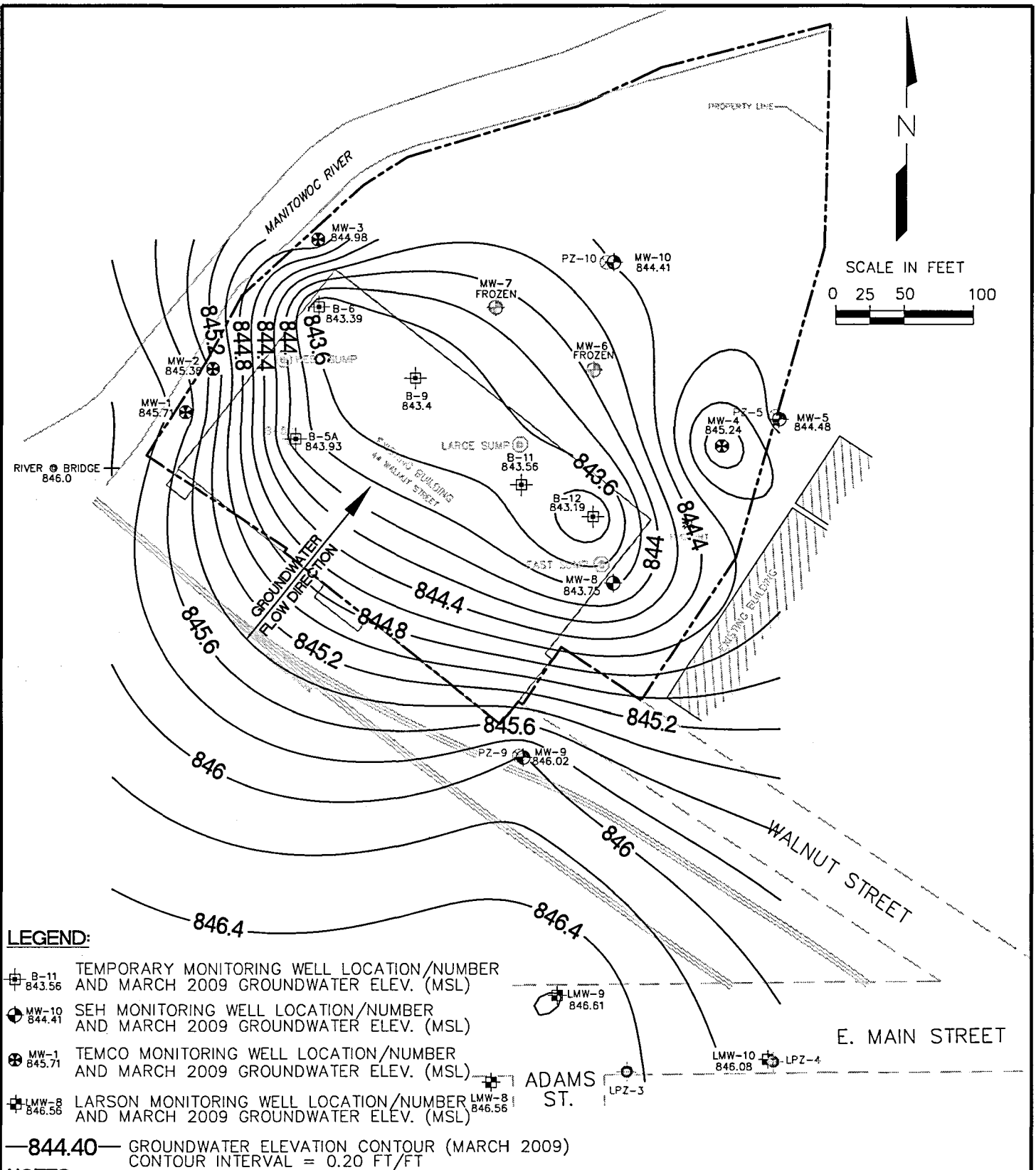


ADDITIONAL SITE INVESTIGATION REPORT
FORMER MIRRO PLANT #20
CHILTON, WISCONSIN

FIGURE 4
GROUNDWATER FLOW MAP
5/21/2008

PROJ. NO. NERUB050201	4
DATE 07/17/06	5

DRAWING DIRECTORY: P:\KO\NERUB\050200\FIGURES\THIRD STAGE SITE INVESTIGATION\FIGURE 3 - MARCH 2009 GROUNDWATER CONTOURS_SHALLOW WELLS



LEGEND:

- ⊕ B-11 843.56 TEMPORARY MONITORING WELL LOCATION/NUMBER AND MARCH 2009 GROUNDWATER ELEV. (MSL)
- ⊕ MW-10 844.41 SEH MONITORING WELL LOCATION/NUMBER AND MARCH 2009 GROUNDWATER ELEV. (MSL)
- ⊕ MW-1 845.71 TEMCO MONITORING WELL LOCATION/NUMBER AND MARCH 2009 GROUNDWATER ELEV. (MSL)
- ⊕ LMW-8 846.58 LARSON MONITORING WELL LOCATION/NUMBER AND MARCH 2009 GROUNDWATER ELEV. (MSL)
- 844.40— GROUNDWATER ELEVATION CONTOUR (MARCH 2009)
CONTOUR INTERVAL = 0.20 FT/FT

NOTES:

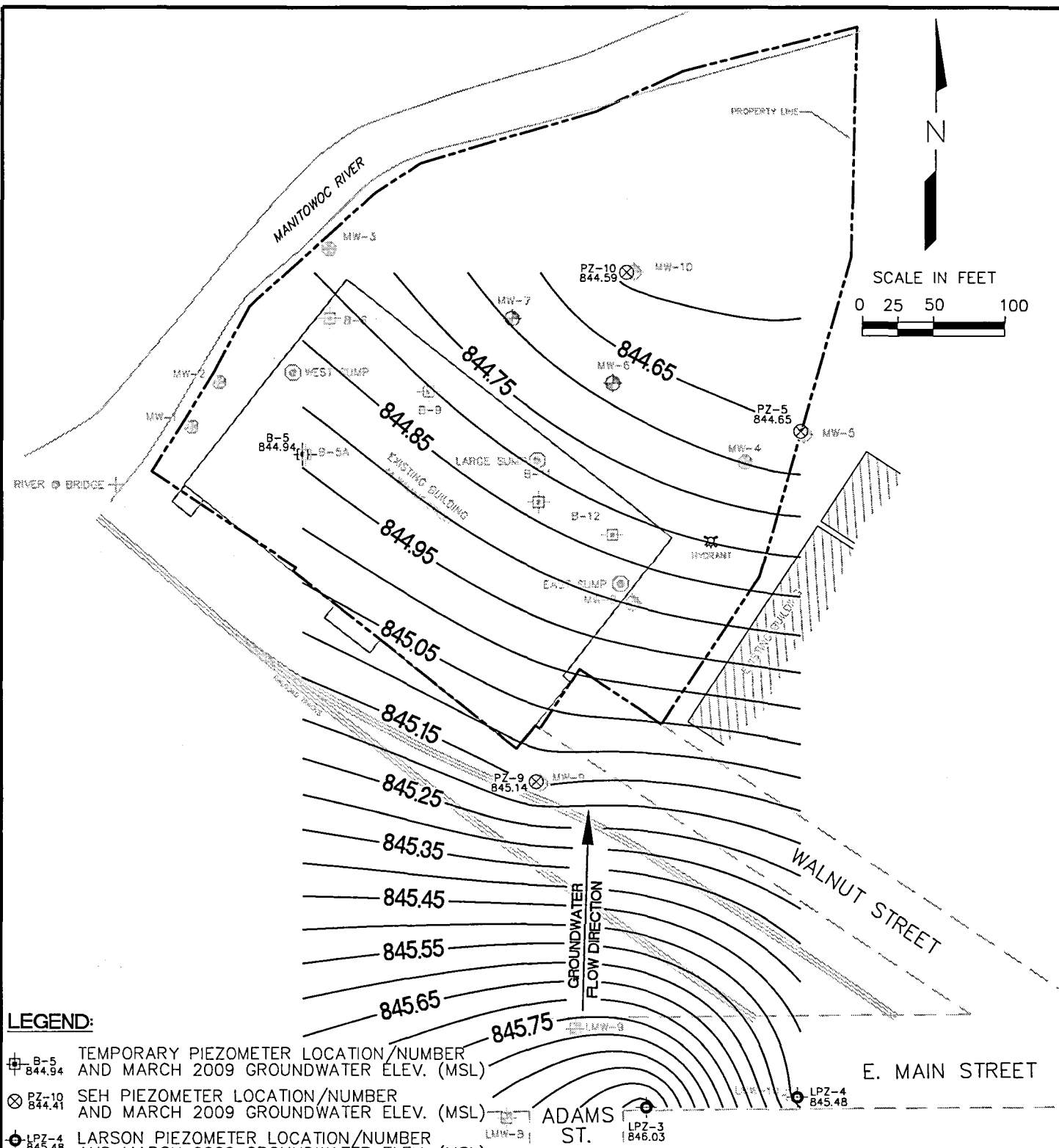
- 1) MW-1 THRU MW-4 WERE INSTALLED BY TEMCO INC.
- 2) LMW WELLS WERE INSTALLED DURING THE LARSON INVESTIGATION
- 3) PROPERTY LINES ON THIS MAP ARE BASED ON THE CURRENT LEGAL DESCRIPTION OF RECORD AND PROPERTY MARKERS FOUND AS SHOWN ON TITLE SURVEY BY KENNETH SCHMALZ, RLS, DATED JANUARY 22, 1980.

SOURCE:
SEH, 2011. Third Stage Site Investigation Report



	1	10/26/10	THIRD STAGE SITE INVESTIGATION	RJH	10/10	KEA	10/10			KEA	10/10
	NO.	DATE	ISSUE/REVISIONS	DRAWN BY	DESIGN	FIELD REVIEW	QC CHECK				
THIRD STAGE SITE INVESTIGATION FORMER MIRRO PLANT #20 CHILTON, WISCONSIN	FIGURE 3 MARCH 2009 GROUNDWATER CONTOURS SHALLOW WELLS			PROJ. NO.	3						
				DATE	10/26/10						

DRAWING DIRECTORY: P:\KO\W\NERUB\050200\FIGURES\THIRD STAGE SITE INVESTIGATION\FIGURE 4 - MARCH 2009 GROUNDWATER CONTOURS_PIEZOMETERS



LEGEND:

- ⊕ B-5 844.94 TEMPORARY PIEZOMETER LOCATION/NUMBER AND MARCH 2009 GROUNDWATER ELEV. (MSL)
- ⊗ PZ-10 844.41 SEH PIEZOMETER LOCATION/NUMBER AND MARCH 2009 GROUNDWATER ELEV. (MSL)
- ⊕ LPZ-4 845.48 LARSON PIEZOMETER LOCATION/NUMBER AND MARCH 2009 GROUNDWATER ELEV. (MSL)

—845.05— GROUNDWATER ELEVATION CONTOUR (MARCH 2009)
CONTOUR INTERVAL = 0.05 FT/FT

NOTES:

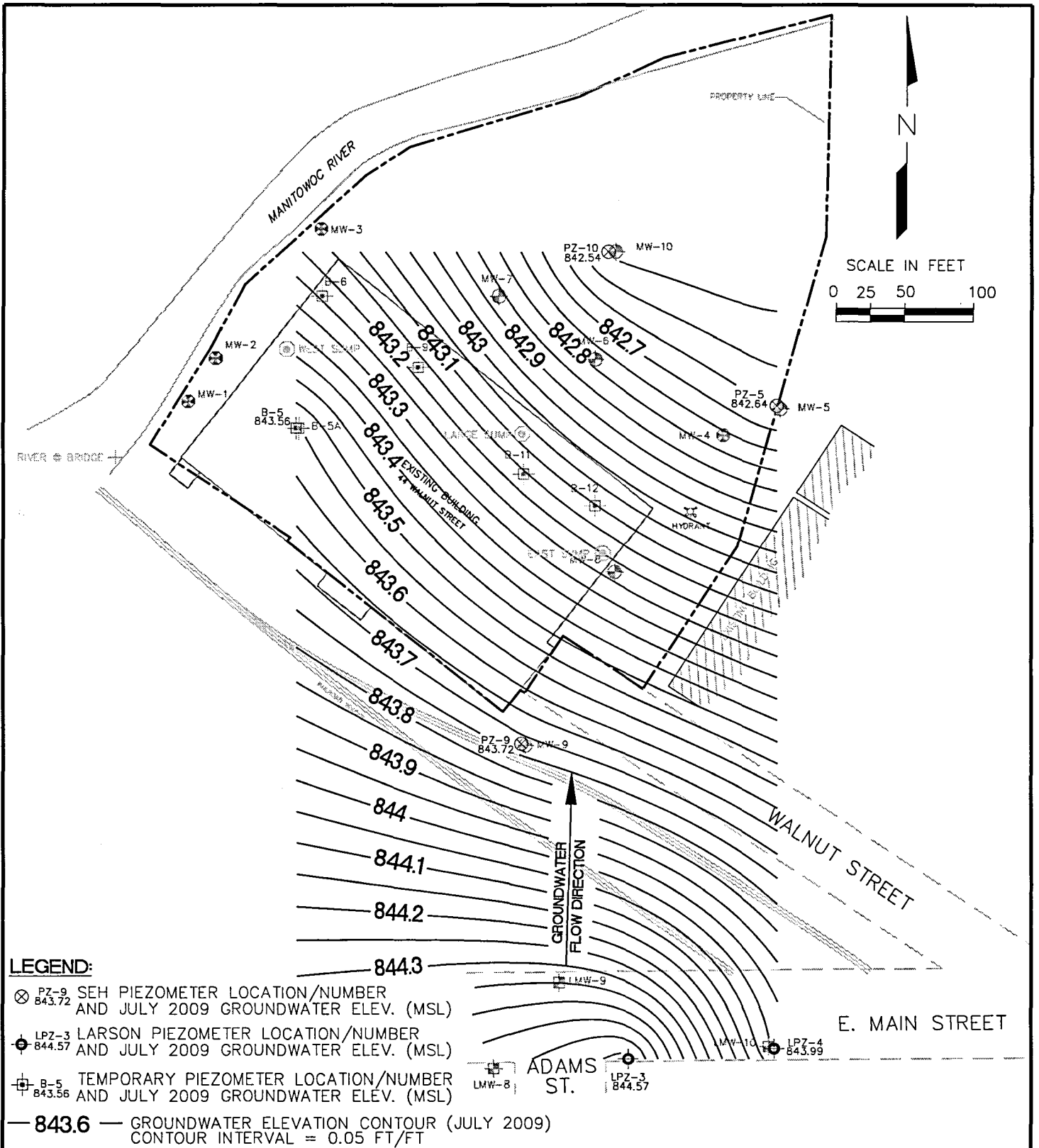
- 1) MW-1 THRU MW-4 WERE INSTALLED BY TEMCO INC.
- 2) LMW WELLS WERE INSTALLED DURING THE LARSON INVESTIGATION
- 3) PROPERTY LINES ON THIS MAP ARE BASED ON THE CURRENT LEGAL DESCRIPTION OF RECORD AND PROPERTY MARKERS FOUND AS SHOWN ON TITLE SURVEY BY KENNETH SCHMALZ, RLS, DATED JANUARY 22, 1980.

SOURCE:
SEH, 2011. Third Stage Site Investigation Report



1	10/26/10	THIRD STAGE SITE INVESTIGATION	RJH	10/10	KEA	10/10			KEA	10/10
NO.	DATE	ISSUE/REVISIONS	DRAWN BY	DESIGN	FIELD REVIEW	QC CHECK				
THIRD STAGE SITE INVESTIGATION FORMER MIRRO PLANT #20 CHILTON, WISCONSIN			FIGURE 4 MARCH 2009 GROUNDWATER CONTOURS PIEZOMETERS		PROJ. NO.	4				
					NERUB0502		DATE	10/26/10	7	

DRAWING DIRECTORY: P:\KON\NERUB\050200\FIGURES\THIRD STAGE SITE INVESTIGATION\FIGURE 6 - JULY 2009 GROUNDWATER CONTOURS_PIEZOMETERS

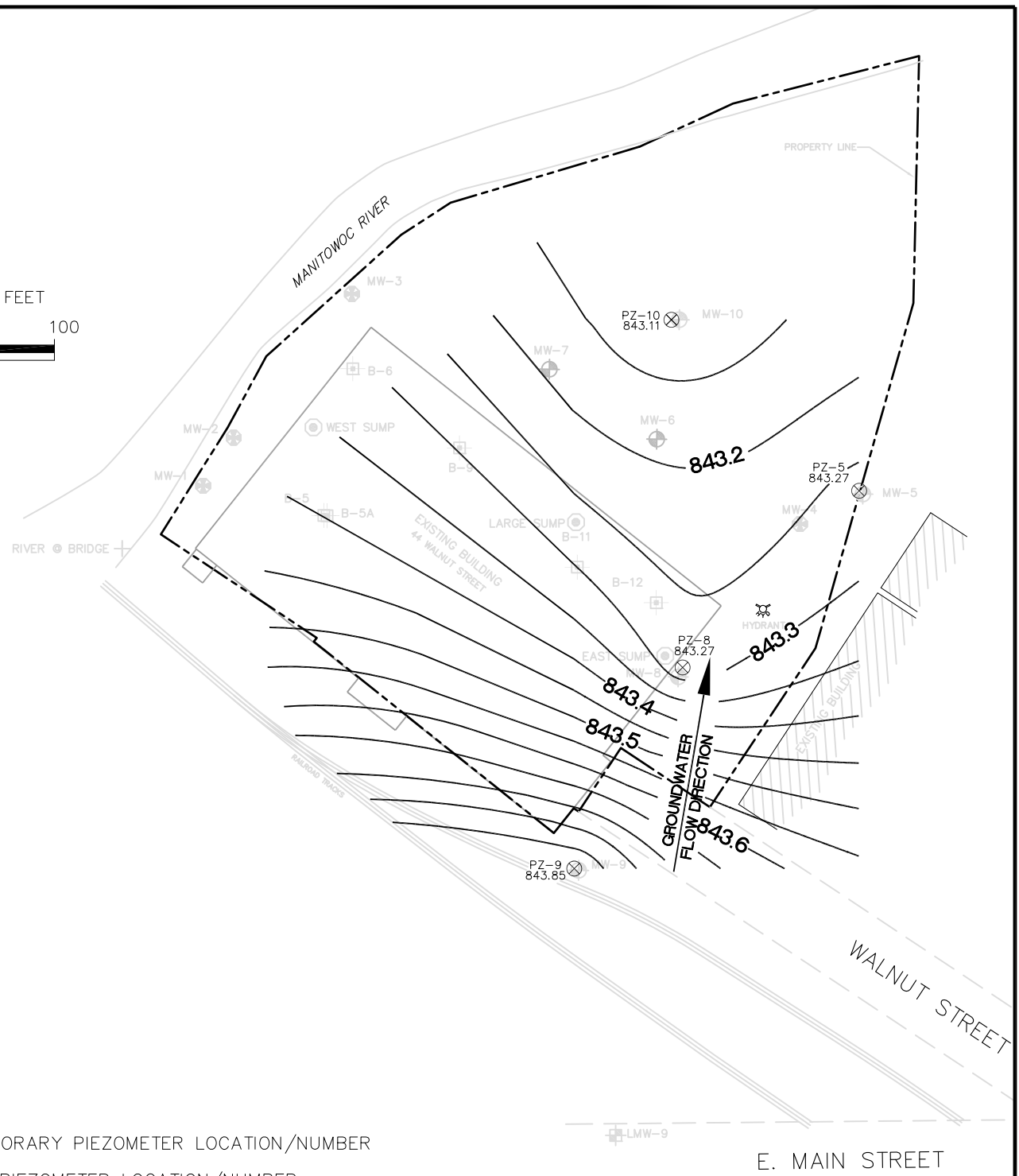
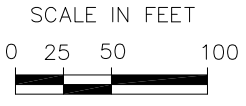


SOURCE:
SEH, 2011. Third Stage Site Investigation Report



1	10/27/10	THIRD STAGE SITE INVESTIGATION	RJH	10/10	KEA	10/10			KEA	10/10
NO.	DATE	ISSUE/REVISIONS	DRAWN BY	DESIGN	FIELD REVIEW	QC CHECK				
THIRD STAGE SITE INVESTIGATION FORMER MIRRO PLANT #20 CHILTON, WISCONSIN			FIGURE 6 JULY 2009 GROUNDWATER CONTOURS PIEZOMETERS		PROJ. NO. NERUB0502	6				
					DATE 10/27/10	7				

DRAWING DIRECTORY: SB\PROJECTS\KO\NERUB\050201\FEB 13 SAMPLING\FIGURES\SITE INVESTIGATION\FIGURE 5 -- FEBRUARY 2013 GROUNDWATER CONTOURS_PIEZOMETERS



LEGEND:

- B-5 TEMPORARY PIEZOMETER LOCATION/NUMBER
- ⊗ PZ-10 SEH PIEZOMETER LOCATION/NUMBER AND FEBRUARY 2013 GROUNDWATER ELEV. (MSL)
- ⊙ LPZ-4 LARSON PIEZOMETER LOCATION/NUMBER
- 845.05— GROUNDWATER ELEVATION CONTOUR (FEBRUARY 2013)
CONTOUR INTERVAL = 0.05 FT/FT

NOTES:

- 1) MW-1 THRU MW-4 WERE INSTALLED BY TEMCO INC.
- 2) LMW WELLS WERE INSTALLED DURING THE LARSON INVESTIGATION
- 3) PROPERTY LINES ON THIS MAP ARE BASED ON THE CURRENT LEGAL DESCRIPTION OF RECORD AND PROPERTY MARKERS FOUND AS SHOWN ON TITLE SURVEY BY KENNETH SCHMALZ, RLS, DATED JANUARY 22, 1980.

SOURCE:
SEH, 2013. Supplemental Site Investigation Report



NO.	DATE	ISSUE/REVISIONS	DRAWN BY	DESIGN	FIELD REVIEW	QC CHECK
1	04/24/13	SITE INVESTIGATION	RJH	04/13	JEG	04/13
SUPPLEMENTAL SITE INVESTIGATION FORMER MIRRO PLANT #20 CHILTON, WISCONSIN			FIGURE 5 FEBRUARY 2013 GROUNDWATER CONTOURS PIEZOMETERS		PROJ. NO. NERUB050201	5
					DATE 04/24/13	6

APPENDIX F

PERTINENT SEH (DECEMBER 2019) AND STANTEC (AUGUST 2020) DATA TABLES

**Table 1
Groundwater Analytical Results**

Analytical Parameters	NR 140 Standards		Well No./Sampling Date																							
	ES	PAL	B-5												B-5A											
			2/16/06	5/30/06	8/29/06	11/15/06	2/19/08	5/21/08	3/20/09	7/8/09	10/6/11	11/4/11	2/28/13	3/1/13	2/16/06	5/30/06	8/29/06	11/15/06	2/19/08	5/21/08	3/20/09	7/8/09	10/6/11	11/4/11	2/28/13	3/1/13
Elevation Data																										
Top of PVC	--	--	846.38	846.38	846.38	846.38	846.38	846.38	846.38	846.38	846.38	846.38	846.38	846.38	846.32	846.32	846.32	846.32	846.32	846.32	846.32	846.32	846.32	846.32	846.32	846.32
Top of Screen	--	--	833.98	833.98	833.98	833.98	833.98	833.98	833.98	833.98	833.98	833.98	833.98	833.98	846.32	846.32	846.32	846.32	846.32	846.32	846.32	846.32	846.32	846.32	846.32	846.32
Bottom of Screen	--	--	832.98	832.98	832.98	832.98	832.98	832.98	832.98	832.98	832.98	832.98	832.98	832.98	841.57	841.57	841.57	841.57	841.57	841.57	841.57	841.57	841.57	841.57	841.57	841.57
Groundwater	--	--	--	844.36	843.23	843.79	844.08	844.17	844.94	843.56	843.88	844.09	--	--	--	843.99	843.42	843.57	843.81	843.87	843.93	843.93	843.69	843.84	--	--
pH	NSE	NSE	7.36	--	--	--	--	--	--	--	--	--	--	--	7.92	--	--	--	--	--	--	--	--	--	--	--
DRO (µg/l)	NSE	NSE	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
PAHs¹ (µg/l)																										
Acenaphthene	NSE	NSE	<0.06	<0.06	<0.06	<0.067	<0.41	<0.38	--	--	--	--	--	--	<0.06	<0.06	<0.06	<0.075	--	--	--	--	--	--	--	--
Acenaphthylene	NSE	NSE	<0.06	<0.06	<0.06	<0.067	<0.85	<0.80	--	--	--	--	--	--	<0.06	<0.06	<0.06	<0.075	--	--	--	--	--	--	--	--
Anthracene	3,000	600	<0.09	<0.09	<0.09	<0.1	<0.047	<0.044	--	--	--	--	--	--	<0.09	<0.09	<0.09	<0.122	--	--	--	--	--	--	--	--
Benzo(a)Anthracene	NSE	NSE	<0.1	<0.1	<0.1	<0.111	<0.054	<0.051	--	--	--	--	--	--	<0.1	<0.1	<0.1	<0.125	--	--	--	--	--	--	--	--
Benzo(a)Pyrene	0.2	0.02	<0.02	<0.02	<0.02	<0.022	<0.040	<0.037	--	--	--	--	--	--	<0.02	<0.02	<0.02	<0.025	--	--	--	--	--	--	--	--
Benzo(b)Fluoranthene	0.2	0.02	0.066	<0.02	<0.02	<0.022	<0.12	<0.11	--	--	--	--	--	--	<0.02	<0.02	<0.02	<0.025	--	--	--	--	--	--	--	--
Benzo(k)Fluoranthene	NSE	NSE	<0.07	<0.07	<0.07	<0.078	<0.060	<0.057	--	--	--	--	--	--	<0.07	<0.07	<0.07	<0.088	--	--	--	--	--	--	--	--
Benzo(g,h,i)Perylene	NSE	NSE	<0.06	<0.06	<0.06	<0.067	<0.15	<0.14	--	--	--	--	--	--	<0.06	<0.06	<0.06	<0.075	--	--	--	--	--	--	--	--
Chrysene	0.2	0.02	<0.02	<0.02	<0.02	<0.022	<0.051	<0.048	--	--	--	--	--	--	<0.02	<0.02	<0.02	<0.025	--	--	--	--	--	--	--	--
Dibenzo(a,h)Anthracene	NSE	NSE	<0.11	<0.11	<0.11	<0.122	<0.16	<0.15	--	--	--	--	--	--	<0.11	<0.11	<0.11	<0.138	--	--	--	--	--	--	--	--
Fluoranthene	400	80	<0.12	<0.12	<0.12	<0.133	<0.10	<0.094	--	--	--	--	--	--	<0.12	<0.12	<0.12	<0.15	--	--	--	--	--	--	--	--
Fluorene	400	80	<0.12	<0.12	<0.12	<0.133	<0.077	<0.072	--	--	--	--	--	--	<0.12	<0.12	<0.12	<0.15	--	--	--	--	--	--	--	--
Indeno(1,2,3-cd)Pyrene	NSE	NSE	<0.12	<0.12	<0.12	<0.133	<0.077	<0.072	--	--	--	--	--	--	0.26	<0.12	<0.12	<0.15	--	--	--	--	--	--	--	--
1-Methyl Naphthalene	NSE	NSE	<0.08	<0.08	<0.08	<0.089	<0.40	<0.37	--	--	--	--	--	--	<0.08	<0.08	<0.08	<0.1	--	--	--	--	--	--	--	--
2-Methyl Naphthalene	NSE	NSE	<0.11	<0.11	<0.11	<0.122	<0.38	<0.36	--	--	--	--	--	--	0.352	<0.11	<0.11	<0.138	--	--	--	--	--	--	--	--
Naphthalene	40	8.0	<0.11	<0.11	<0.11	<0.122	<0.49	<0.47	--	--	--	--	--	--	0.194	<0.11	<0.11	<0.138	--	--	--	--	--	--	--	--
Phenanthrene	NSE	NSE	<0.11	<0.11	<0.11	<0.122	<0.037	<0.035	--	--	--	--	--	--	<0.11	<0.11	<0.11	<0.138	--	--	--	--	--	--	--	--
Pyrene	250	50	<0.1	<0.1	<0.1	<0.111	<0.054	<0.051	--	--	--	--	--	--	<0.1	<0.1	<0.1	<0.125	--	--	--	--	--	--	--	--
VOCs² (µg/l)																										
Benzene	5.0	0.5	<0.15	<0.15	<0.15	<0.15	<0.20	<0.20	--	--	--	--	--	--	<0.15	<0.15	<0.15	<0.15	<0.20	<0.20	--	--	--	--	--	--
Bromobenzene	NSE	NSE	<0.1	<0.1	<0.1	<0.1	<0.20	<0.20	--	--	--	--	--	--	<0.1	<0.1	<0.1	<0.1	<0.20	<0.20	--	--	--	--	--	--
Bromochloromethane	NSE	NSE	--	<0.1	<0.1	<0.1	<0.50	<0.50	--	--	--	--	--	--	--	<0.1	<0.1	<0.1	<0.50	<0.50	--	--	--	--	--	--
Bromodichloromethane	0.6	0.06	<0.1	<0.1	<0.1	<0.1	<0.20	<0.20	--	--	--	--	--	--	<0.1	<0.1	<0.1	<0.20	<0.20	--	--	--	--	--	--	--
Bromomethane	10	1.0	--	<0.15	<0.15	<0.15	<0.20	<0.20	--	--	--	--	--	--	--	<0.15	<0.15	<0.15	<0.20	<0.20	--	--	--	--	--	--
n-Butylbenzene	NSE	NSE	<0.2	<0.2	<0.2	<0.2	<0.20	<0.20	--	--	--	--	--	--	<0.2	<0.2	<0.2	<0.2	<0.20	<0.20	--	--	--	--	--	--
sec-Butylbenzene	NSE	NSE	<0.15	<0.15	<0.15	<0.15	<0.25	<0.25	--	--	--	--	--	--	<0.15	<0.15	<0.15	<0.15	<0.25	<0.25	--	--	--	--	--	--
tert-Butylbenzene	NSE	NSE	0.236	<0.15	<0.15	<0.15	<0.20	<0.20	--	--	--	--	--	--	0.252	<0.15	<0.15	<0.15	<0.20	<0.20	--	--	--	--	--	--
Carbon Tetrachloride	5.0	0.5	<0.2	<0.2	<0.2	<0.2	<0.50	<0.50	--	--	--	--	--	--	<0.2	<0.2	<0.2	<0.2	<0.50	<0.50	--	--	--	--	--	--
Chlorobenzene	NSE	NSE	<0.1	<0.1	<0.1	<0.1	<0.20	<0.20	--	--	--	--	--	--	<0.1	<0.1	<0.1	<0.1	<0.20	<0.20	--	--	--	--	--	--
Chlorodibromomethane	NSE	NSE	<0.1	<0.1	<0.1	<0.1	<0.20	<0.20	--	--	--	--	--	--	<0.1	<0.1	<0.1	<0.1	<0.20	<0.20	--	--	--	--	--	--
Chloroethane	400	80	<0.6	<0.6	<0.6	<0.6	<1.0	<1.0	--	--	--	--	--	--	<0.6	<0.6	<0.6	<0.6	<1.0	<1.0	--	--	--	--	--	--
Chloroform	6.0	0.6	<0.1	<0.1	<0.1	<0.1	<0.20	<0.20	--	--	--	--	--	--	<0.1	<0.1	<0.1	<0.1	<0.20	<0.20	--	--	--	--	--	--
Chloromethane	3.0	0.3	<0.2	0.24	<0.2	<0.2	<0.20	<0.20	--	--	--	--	--	--	<0.2	<0.2	<0.2	<0.2	<0.20	<0.20	--	--	--	--	--	--
o-Chlorotoluene	NSE	NSE	<0.1	<0.1	<0.1	<0.1	<0.50	<0.50	--	--	--	--	--	--	<0.1	<0.1	<0.1	<0.1	<0.50	<0.50	--	--	--	--	--	--
p-Chlorotoluene	NSE	NSE	<0.2	<0.2	<0.2	<0.2	<0.20	<0.20	--	--	--	--	--	--	<0.2	<0.2	<0.2	<0.2	<0.20	<0.20	--	--	--	--	--	--
1,2-Dibromo-3-chloropropane	0.2	0.02	<0.3	<0.35	<0.35	<0.35	<0.50	<0.50	--	--	--	--	--	--	<0.3	<0.35	<0.35	<0.35	<0.50	<0.50	--	--	--	--	--	--
1,2-Dibromoethane	0.05	0.005	<0.1	<0.1	<0.1	<0.1	<0.20	<0.20	--	--	--	--	--	--	<0.1	<0.1	<0.1	<0.1	<0.20	<0.20	--	--	--	--	--	--

SOURCE:
SEH, 2019. Comprehensive Site Investigation Report
NOTE: WDNR Regulatory criteria is not current.

**Table 1
Groundwater Analytical Results**

Analytical Parameters	NR 140 Standards		Well No./Sampling Date																							
			B-5												B-5A											
	ES	PAL	2/16/06	5/30/06	8/29/06	11/15/06	2/19/08	5/21/08	3/20/09	7/8/09	10/6/11	11/4/11	2/28/13	3/1/13	2/16/06	5/30/06	8/29/06	11/15/06	2/19/08	5/21/08	3/20/09	7/8/09	10/6/11	11/4/11	2/28/13	3/1/13
VOCs² (µg/l)																										
1,2-Dichlorobenzene	600	60	<0.75	<0.75	<0.75	<0.75	<0.20	<0.20	--	--	--	--	--	<0.75	<0.75	<0.75	<0.75	<0.20	<0.20	--	--	--	--	--	--	--
1,3-Dichlorobenzene	1,250	125	<0.15	<0.15	<0.15	<0.15	<0.20	<0.20	--	--	--	--	--	<0.15	<0.15	<0.15	<0.15	<0.20	<0.20	--	--	--	--	--	--	--
1,4-Dichlorobenzene	75	15	<0.75	<0.75	<0.75	<0.75	<0.20	<0.20	--	--	--	--	--	<0.75	<0.75	<0.75	<0.75	<0.20	<0.20	--	--	--	--	--	--	--
Dichlorodifluoromethane	1,000	200	<0.25	<0.25	<0.25	<0.25	<0.50	<0.50	--	--	--	--	--	<0.25	<0.25	<0.25	<0.25	<0.50	<0.50	--	--	--	--	--	--	--
1,1-Dichloroethane	850	85	<0.15	<0.15	<0.15	<0.15	<0.50	<0.50	--	--	--	--	--	<0.15	<0.15	<0.15	<0.15	<0.50	<0.50	--	--	--	--	--	--	--
1,2-Dichloroethane	5.0	0.5	<0.1	<0.1	<0.1	<0.1	<0.50	<0.50	--	--	--	--	--	<0.1	<0.1	<0.1	<0.1	<0.50	<0.50	--	--	--	--	--	--	--
1,1-Dichloroethylene	7.0	0.7	<0.15	<0.15	<0.15	<0.15	<0.50	<0.50	--	--	--	--	--	<0.15	<0.15	<0.15	<0.15	<0.50	<0.50	--	--	--	--	--	--	--
cis-1,2-Dichloroethylene	70	7.0	<0.2	<0.2	<0.2	<0.2	<0.50	<0.50	--	--	--	--	--	<0.2	<0.2	<0.2	<0.2	<0.50	<0.50	--	--	--	--	--	--	--
trans-1,2-Dichloroethylene	100	20	<0.1	<0.1	<0.1	<0.1	<0.50	<0.50	--	--	--	--	--	<0.1	<0.1	<0.1	<0.1	<0.50	<0.50	--	--	--	--	--	--	--
1,2-Dichloropropane	5.0	0.5	<0.1	<0.1	<0.1	<0.1	<0.50	<0.50	--	--	--	--	--	<0.1	<0.1	<0.1	0.26	<0.50	<0.50	--	--	--	--	--	--	--
1,3-Dichloropropane	NSE	NSE	<0.1	<0.1	<0.1	<0.1	<0.25	<0.25	--	--	--	--	--	<0.1	<0.1	<0.1	<0.1	<0.25	<0.25	--	--	--	--	--	--	--
2,2-Dichloropropane	NSE	NSE	<0.1	<0.1	<0.1	<0.1	<0.50	<0.50	--	--	--	--	--	<0.1	<0.1	<0.1	<0.1	<0.50	<0.50	--	--	--	--	--	--	--
1,1-Dichloropropene	NSE	NSE	<0.2	<0.3	<0.3	<0.3	<0.50	<0.50	--	--	--	--	--	<0.2	<0.3	<0.3	<0.3	<0.50	<0.50	--	--	--	--	--	--	--
cis-1,3-Dichloropropene	0.2	0.02	<0.1	<0.1	<0.1	<0.1	<0.20	<0.20	--	--	--	--	--	<0.1	<0.1	<0.1	<0.1	<0.20	<0.20	--	--	--	--	--	--	--
trans-1,3-Dichloropropene	0.2	0.02	<0.1	<0.1	<0.1	<0.1	<0.20	<0.20	--	--	--	--	--	<0.1	<0.1	<0.1	<0.1	<0.20	<0.20	--	--	--	--	--	--	--
Ethylbenzene	700	140	<0.1	<0.1	<0.1	<0.1	<0.50	<0.50	--	--	--	--	--	<0.1	<0.1	<0.1	0.15	<0.50	<0.50	--	--	--	--	--	--	--
Hexachlorobutadiene	NSE	NSE	<1.00	<1.00	<1.00	<1.00	<0.50	<0.50	--	--	--	--	--	<1.00	<1.00	<1.00	<1.00	<0.50	<0.50	--	--	--	--	--	--	--
Isopropylbenzene	NSE	NSE	<0.1	<0.1	<0.1	<0.1	<0.20	<0.20	--	--	--	--	--	0.602	<0.1	<0.1	0.4	<0.20	<0.20	--	--	--	--	--	--	--
Isopropyl Ether	NSE	NSE	--	--	--	--	<0.50	<0.50	--	--	--	--	--	--	--	--	--	<0.50	<0.50	--	--	--	--	--	--	--
p-Isopropyltoluene	NSE	NSE	<0.2	<0.2	<0.2	<0.2	<0.20	<0.20	--	--	--	--	--	<0.2	<0.2	<0.2	0.34	<0.20	<0.20	--	--	--	--	--	--	--
Methyl tert Butyl Ether	60	12	<0.1	0.66	<0.1	<0.1	<0.50	<0.50	--	--	--	--	--	<0.1	0.36	<0.1	<0.1	<0.50	<0.50	--	--	--	--	--	--	--
Methylene Chloride	5.0	0.5	<0.4	<0.4	<0.4	<0.4	<1.0	<1.0	--	--	--	--	--	<0.4	<0.4	<0.4	<0.4	<1.0	<1.0	--	--	--	--	--	--	--
Naphthalene	40	8.0	<1.00	<1.00	<1.00	<1.00	<0.25	<0.25	--	--	--	--	--	<1.00	<1.00	<1.00	<1.00	<0.25	<0.25	--	--	--	--	--	--	--
n-Propylbenzene	NSE	NSE	<0.1	<0.1	<0.1	<0.1	<0.50	<0.50	--	--	--	--	--	0.138	<0.1	<0.1	0.11	<0.50	<0.50	--	--	--	--	--	--	--
Tetrachloroethylene	5.0	0.5	<0.1	<0.1	<0.1	<0.1	<0.50	<0.50	--	--	--	--	--	<0.1	<0.1	<0.1	<0.1	<0.50	<0.50	--	--	--	--	--	--	--
1,1,1,2-Tetrachloroethane	70	7.0	<0.1	<0.1	<0.1	<0.1	<0.25	<0.25	--	--	--	--	--	<0.1	<0.1	<0.1	<0.1	<0.25	<0.25	--	--	--	--	--	--	--
1,1,1,2,2-Tetrachloroethane	0.2	0.02	0.286	<0.1	<0.1	<0.1	<0.20	<0.20	<0.05	<0.05	--	--	--	0.51	<0.1	<0.1	0.29	<0.20	<0.20	--	--	--	--	--	--	--
Toluene	1,000	200	<0.4	<0.4	<0.4	<0.4	<0.20	<0.20	--	--	--	--	--	<0.4	<0.4	<0.4	<0.4	<0.20	<0.20	--	--	--	--	--	--	--
1,1,2-Trichloroethane	5.0	0.5	--	<u>0.58</u>	<0.1	<0.1	<0.25	<0.25	--	--	--	--	--	--	0.21	<0.1	<0.1	<0.25	<0.25	--	--	--	--	--	--	--
Total Trimethylbenzenes	480	96	<0.3	0.22	0.15	<0.3	<0.40	<0.40	--	--	--	--	--	3.93	<0.3	<0.3	2.11	<0.40	<0.40	--	--	--	--	--	--	--
1,2,3-Trichlorobenzene	NSE	NSE	<0.5	<0.5	<0.5	<0.5	<0.25	<0.25	--	--	--	--	--	<0.5	<0.5	<0.5	<0.5	<0.25	<0.25	--	--	--	--	--	--	--
1,2,4-Trichlorobenzene	70	14	<0.5	0.58	<0.5	<0.5	<0.25	<0.25	--	--	--	--	--	<0.5	<0.5	<0.5	<0.5	<0.25	<0.25	--	--	--	--	--	--	--
1,1,1-Trichloroethane	200	40	<0.2	<0.2	<0.2	<0.2	<0.50	<0.50	--	--	--	--	--	<0.2	0.21	<0.2	<0.2	<0.50	<0.50	--	--	--	--	--	--	--
Trichloroethylene	5.0	0.5	<0.2	<0.2	<0.2	<0.2	<0.20	<0.20	--	--	--	--	--	<0.2	<0.2	<0.2	<0.2	<0.20	<0.20	--	--	--	--	--	--	--
Trichlorofluoromethane	NSE	NSE	<0.2	<0.2	<0.2	<0.2	<0.50	<0.50	--	--	--	--	--	<0.2	<0.2	<0.2	<0.2	<0.50	<0.50	--	--	--	--	--	--	--
Vinyl Chloride	0.2	0.02	<0.15	<0.15	<0.15	<0.15	<0.20	<0.20	<0.016	--	--	--	--	<0.15	<0.15	<0.15	<0.15	<0.20	<0.20	--	--	--	--	--	--	--
Total Xylenes	10,000	1,000	<0.5	<0.5	<0.5	<0.5	<0.50	<0.50	--	--	--	--	--	0.112	<0.5	<0.5	0.52	<0.50	<0.50	--	--	--	--	--	--	--
Metals (µg/l)																										
Arsenic	50	5.0	<0.6	--	--	--	--	--	--	--	--	--	--	1.4	--	--	--	--	--	--	--	--	--	--	--	--
Barium	2000	400	69.3	--	--	--	--	--	--	--	--	--	--	57	--	--	--	--	--	--	--	--	--	--	--	--
Cadmium	5.0	0.5	<0.2	--	--	--	--	--	--	--	--	--	--	<0.2	--	--	--	--	--	--	--	--	--	--	--	--
Chromium	100	10	<1.60	--	--	--	--	--	--	--	--	--	--	<1.60	--	--	--	--	--	--	--	--	--	--	--	--
Lead	15	1.5	<0.3	--	--	--	--	--	--	--	--	--	--	<0.3	--	--	--	--	--	--	--	--	--	--	--	--
Mercury	2.0	0.2	<0.07	--	--	--	--	--	--	--	--	--	--	<0.07	--	--	--	--	--	--	--	--	--	--	--	--
Selenium	50	10	0.6	--	--	--	--	--	--	--	--	--	--	0.9	--	--	--	--	--	--	--	--	--	--	--	--
Silver	50	10	<0.2	--	--	--	--	--	--	--	--	--	--	<0.2	--	--	--	--	--	--	--	--	--	--	--	--

SOURCE:
SEH, 2019. Comprehensive Site Investigation Report
NOTE: WDNR Regulatory criteria is not current.

**Table 1
Groundwater Analytical Results**

Analytical Parameters	NR 140 Standards		Well No./Sampling Date																							
	ES	PAL	B-6												B-9											
			2/16/06	5/30/06	8/29/06	11/15/06	2/19/08	5/21/08	3/20/09	7/8/09	10/6/11	11/4/11	2/28/13	3/1/13	2/16/06	5/30/06	8/29/06	11/15/06	2/19/08	5/21/08	3/20/09	7/8/09	10/6/11	11/4/11	2/28/13	3/1/13
Elevation Data																										
Top of PVC	--	--	846.52	846.52	846.52	846.52	846.52	846.52	846.52	846.52	846.52	846.52	846.52	846.52	846.45	846.45	846.45	846.45	846.45	846.45	846.45	846.45	846.45	846.45	846.45	846.45
Top of Screen	--	--	846.52	846.52	846.52	846.52	846.52	846.52	846.52	846.52	846.52	846.52	846.52	846.52	846.45	846.45	846.45	846.45	846.45	846.45	846.45	846.45	846.45	846.45	846.45	846.45
Bottom of Screen	--	--	841.80	841.80	841.80	841.80	841.80	841.80	841.80	841.80	841.80	841.80	841.80	841.80	841.68	841.68	841.68	841.68	841.68	841.68	841.68	841.68	841.68	841.68	841.68	841.68
Groundwater	--	--	--	843.27	842.62	842.85	843.22	843.19	843.39	842.73	841.94	843.12	--	--	--	843.13	842.65	842.90	842.90	843.15	843.11	843.40	842.66	842.95	843.10	--
pH	NSE	NSE	7.93	--	--	--	--	--	--	--	--	--	--	--	7.45	--	--	--	--	--	--	--	--	--	--	--
DRO (µg/l)	NSE	NSE	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
PAHs¹ (µg/l)																										
Acenaphthene	NSE	NSE	<0.06	<0.06	<0.06	<0.06	<0.42	<0.35	--	--	--	--	--	--	<0.06	<0.06	<0.06	<0.067	<0.41	<0.36	--	--	--	--	--	--
Acenaphthylene	NSE	NSE	<0.06	<0.06	<0.06	<0.06	<0.87	<0.74	--	--	--	--	--	--	<0.06	<0.06	<0.06	<0.067	<0.85	<0.76	--	--	--	--	--	--
Anthracene	3,000	600	<0.09	<0.09	<0.09	<0.09	<0.048	<0.041	--	--	--	--	--	--	<0.09	<0.09	<0.09	<0.100	<0.047	<0.042	--	--	--	--	--	--
Benzo(a)Anthracene	NSE	NSE	<0.1	<0.1	<0.1	<0.1	<0.056	<0.047	--	--	--	--	--	--	<0.1	<0.1	<0.1	<0.111	<0.054	<0.048	--	--	--	--	--	--
Benzo(a)Pyrene	0.2	0.02	<0.02	<0.02	<0.02	<0.02	<0.041	<0.034	--	--	--	--	--	--	<0.02	<0.02	<0.02	<0.022	<0.040	<0.035	--	--	--	--	--	--
Benzo(b)Fluoranthene	0.2	0.02	<0.02	<0.02	<0.02	<0.02	<0.12	<0.11	--	--	--	--	--	--	<0.02	<0.02	<0.02	0.205	<0.12	<0.11	<0.11	<0.24	--	--	--	--
Benzo(k)Fluoranthene	NSE	NSE	<0.07	<0.07	<0.07	<0.07	<0.062	<0.053	--	--	--	--	--	--	<0.07	<0.07	<0.07	0.193	<0.060	<0.054	--	--	--	--	--	--
Benzo(g,h,i)Perylene	NSE	NSE	<0.06	<0.06	<0.06	<0.06	<0.015	<0.13	--	--	--	--	--	--	0.1	<0.06	<0.06	0.134	<0.15	<0.13	--	--	--	--	--	--
Chrysene	0.2	0.02	<0.02	<0.02	<u>0.062</u>	<0.02	<0.052	<0.044	--	--	--	--	--	--	<u>0.15</u>	<u>0.090</u>	<0.02	0.258	<0.051	<0.045	<0.044	<0.10	--	--	--	--
Dibenzo(a,h)Anthracene	NSE	NSE	<0.11	<0.11	<0.11	<0.11	<0.16	<0.14	--	--	--	--	--	--	<0.11	<0.11	<0.11	<0.122	<0.16	<0.14	--	--	--	--	--	--
Fluoranthene	400	80	<0.12	<0.12	<0.12	<0.12	<0.10	<0.087	--	--	--	--	--	--	<0.12	0.157	<0.12	0.398	<0.10	<0.089	--	--	--	--	--	--
Fluorene	400	80	<0.12	<0.12	<0.12	<0.12	<0.078	<0.067	--	--	--	--	--	--	<0.12	<0.12	<0.12	<0.133	<0.077	<0.068	--	--	--	--	--	--
Indeno(1,2,3-cd)Pyrene	NSE	NSE	<0.12	<0.12	<0.12	<0.12	<0.078	<0.067	--	--	--	--	--	--	<0.12	<0.12	<0.12	<0.133	<0.077	<0.068	--	--	--	--	--	--
1-Methyl Naphthalene	NSE	NSE	<0.08	<0.08	<0.08	<0.08	<0.41	<0.34	--	--	--	--	--	--	<0.08	<0.08	<0.08	<0.089	<0.40	<0.35	--	--	--	--	--	--
2-Methyl Naphthalene	NSE	NSE	<0.11	<0.11	<0.11	<0.11	<0.39	<0.33	--	--	--	--	--	--	<0.11	<0.11	<0.11	<0.122	<0.38	<0.34	--	--	--	--	--	--
Naphthalene	40	8.0	<0.11	<0.11	<0.11	<0.11	<0.51	<0.43	--	--	--	--	--	--	<0.11	<0.11	<0.11	<0.122	<0.49	<0.44	--	--	--	--	--	--
Phenanthrene	NSE	NSE	<0.11	<0.11	<0.11	<0.11	<0.038	<0.032	--	--	--	--	--	--	<0.11	<0.11	<0.11	0.186	<0.037	0.041	--	--	--	--	--	--
Pyrene	250	50	<0.1	<0.1	<0.1	<0.1	<0.056	<0.047	--	--	--	--	--	--	<0.1	<0.1	<0.1	<0.111	<0.054	<0.048	--	--	--	--	--	--
VOCs² (µg/l)																										
Benzene	5.0	0.5	<0.15	<0.15	<0.15	<0.15	--	--	--	--	--	--	--	--	<0.15	<0.15	<0.15	<0.15	<0.20	<0.20	--	--	--	--	--	--
Bromobenzene	NSE	NSE	<0.1	<0.1	<0.1	<0.1	--	--	--	--	--	--	--	--	<0.1	<0.1	<0.1	<0.1	<0.20	<0.20	--	--	--	--	--	--
Bromochloromethane	NSE	NSE	--	0.2	<0.1	<0.1	--	--	--	--	--	--	--	--	<0.1	<0.1	<0.1	<0.1	<0.50	<0.50	--	--	--	--	--	--
Bromodichloromethane	0.6	0.06	<0.1	<0.1	<0.1	<0.1	--	--	--	--	--	--	--	--	<0.1	<0.1	<0.1	<0.1	<0.20	<0.20	--	--	--	--	--	--
Bromomethane	10	1.0	--	<0.15	<0.15	<0.15	--	--	--	--	--	--	--	--	--	<0.15	<0.15	<0.15	<0.20	<0.20	--	--	--	--	--	--
n-Butylbenzene	NSE	NSE	<0.2	<0.2	<0.2	<0.2	--	--	--	--	--	--	--	--	<0.2	<0.2	<0.2	<0.2	<0.20	<0.20	--	--	--	--	--	--
sec-Butylbenzene	NSE	NSE	<0.15	<0.15	<0.15	<0.15	--	--	--	--	--	--	--	--	<0.15	<0.15	<0.15	<0.15	<0.25	<0.25	--	--	--	--	--	--
tert-Butylbenzene	NSE	NSE	<0.15	<0.15	<0.15	<0.15	--	--	--	--	--	--	--	--	<0.15	<0.15	<0.15	<0.15	<0.20	<0.20	--	--	--	--	--	--
Carbon Tetrachloride	5.0	0.5	<0.2	<0.2	<0.2	<0.2	--	--	--	--	--	--	--	--	<0.2	<0.2	<0.2	<0.2	<0.50	<0.50	--	--	--	--	--	--
Chlorobenzene	NSE	NSE	<0.1	<0.1	<0.1	<0.1	--	--	--	--	--	--	--	--	<0.1	<0.1	<0.1	<0.1	<0.20	<0.20	--	--	--	--	--	--
Chlorodibromomethane	NSE	NSE	<0.1	<0.1	<0.1	<0.1	--	--	--	--	--	--	--	--	<0.1	<0.1	<0.1	<0.1	<0.20	<0.20	--	--	--	--	--	--
Chloroethane	400	80	<0.6	<0.6	<0.6	<0.6	--	--	--	--	--	--	--	--	<0.6	<0.6	<0.6	<0.6	<1.0	<1.0	--	--	--	--	--	--
Chloroform	6.0	0.6	<0.1	<0.1	<0.1	<0.1	--	--	--	--	--	--	--	--	<0.1	<0.1	<0.1	<0.1	<0.20	<0.20	--	--	--	--	--	--
Chloromethane	3.0	0.3	<0.2	<0.2	<0.2	<0.2	--	--	--	--	--	--	--	--	<0.2	<u>0.49</u>	<0.2	<u>0.39</u>	<0.20	<0.20	--	--	--	--	--	--
o-Chlorotoluene	NSE	NSE	<0.1	<0.1	<0.1	<0.1	--	--	--	--	--	--	--	--	<0.1	<0.1	<0.1	<0.1	<0.50	<0.50	--	--	--	--	--	--
p-Chlorotoluene	NSE	NSE	<0.2	<0.2	<0.2	<0.2	--	--	--	--	--	--	--	--	<0.2	<0.2	<0.2	<0.2	<0.20	<0.20	--	--	--	--	--	--
1,2-Dibromo-3-chloropropane	0.2	0.02	<0.3	<0.35	<0.35	<0.35	--	--	--	--	--	--	--	--	<0.3	<0.35	<0.35	<0.35	<0.50	<0.50	--	--	--	--	--	--
1,2-Dibromoethane	0.05	0.005	<0.1	<0.1	<0.1	<0.1	--	--	--	--	--	--	--	--	<0.1	<0.1	<0.1	<0.1	<0.20	<0.20	--	--	--	--	--	--

SOURCE:
SEH, 2019. Comprehensive Site Investigation Report
NOTE: WDNR Regulatory criteria is not current.

**Table 1
Groundwater Analytical Results**

Analytical Parameters	NR 140 Standards		Well No./Sampling Date																							
			B-6												B-9											
	ES	PAL	2/16/06	5/30/06	8/29/06	11/15/06	2/19/06	5/21/08	3/20/09	7/8/09	10/6/11	11/4/11	2/28/13	3/1/13	2/16/06	5/30/06	8/29/06	11/15/06	2/19/08	5/21/08	3/20/09	7/8/09	10/6/11	11/4/11	2/28/13	3/1/13
VOCs² (µg/l)																										
1,2-Dichlorobenzene	600	60	<0.75	<0.75	<0.75	<0.75	--	--	--	--	--	--	--	<0.75	<0.75	<0.75	<0.75	<0.20	<0.20	--	--	--	--	--	--	
1,3-Dichlorobenzene	1,250	125	<0.15	<0.15	<0.15	<0.15	--	--	--	--	--	--	--	<0.15	<0.15	<0.15	<0.15	<0.20	<0.20	--	--	--	--	--	--	
1,4-Dichlorobenzene	75	15	<0.75	<0.75	<0.75	<0.75	--	--	--	--	--	--	--	<0.75	<0.75	<0.75	<0.75	<0.20	<0.20	--	--	--	--	--	--	
Dichlorodifluoromethane	1,000	200	<0.25	<0.25	<0.25	<0.25	--	--	--	--	--	--	--	<0.25	<0.25	<0.25	<0.25	<0.50	<0.50	--	--	--	--	--	--	
1,1-Dichloroethane	850	85	<0.15	<0.15	<0.15	<0.15	--	--	--	--	--	--	--	<0.15	<0.15	<0.15	<0.15	<0.50	<0.50	--	--	--	--	--	--	
1,2-Dichloroethane	5.0	0.5	<0.1	0.2	<0.1	<0.1	--	--	--	--	--	--	--	<0.1	<0.1	<0.1	<0.1	<0.50	<0.50	--	--	--	--	--	--	
1,1-Dichloroethylene	7.0	0.7	<0.15	<0.15	<0.15	<0.15	--	--	--	--	--	--	--	<0.15	<0.15	<0.15	<0.15	<0.50	<0.50	--	--	--	--	--	--	
cis-1,2-Dichloroethylene	70	7.0	<0.2	0.34	<0.2	<0.2	--	--	--	--	--	--	--	<0.2	<0.2	<0.2	<0.2	<0.50	<0.50	--	--	--	--	--	--	
trans-1,2-Dichloroethylene	100	20	<0.1	<0.1	<0.1	<0.1	--	--	--	--	--	--	--	<0.1	<0.1	<0.1	<0.1	<0.50	<0.50	--	--	--	--	--	--	
1,2-Dichloropropane	5.0	0.5	<0.1	<0.1	<0.1	<0.1	--	--	--	--	--	--	--	<0.1	<0.1	<0.1	<0.1	<0.50	<0.50	--	--	--	--	--	--	
1,3-Dichloropropane	NSE	NSE	<0.1	<0.1	<0.1	<0.1	--	--	--	--	--	--	--	<0.1	<0.1	<0.1	<0.1	<0.25	<0.25	--	--	--	--	--	--	
2,2-Dichloropropane	NSE	NSE	<0.1	<0.1	<0.1	<0.1	--	--	--	--	--	--	--	<0.1	<0.1	<0.1	<0.1	<0.50	<0.50	--	--	--	--	--	--	
1,1-Dichloropropene	NSE	NSE	<0.2	<0.3	<0.3	<0.3	--	--	--	--	--	--	--	<0.2	<0.3	<0.3	<0.3	<0.50	<0.50	--	--	--	--	--	--	
cis-1,3-Dichloropropene	0.2	0.02	<0.1	<0.1	<0.1	<0.1	--	--	--	--	--	--	--	<0.1	<0.1	<0.1	<0.1	<0.20	<0.20	--	--	--	--	--	--	
trans-1,3-Dichloropropene	0.2	0.02	<0.1	<0.1	<0.1	<0.1	--	--	--	--	--	--	--	<0.1	<0.1	<0.1	<0.1	<0.20	<0.20	--	--	--	--	--	--	
Ethylbenzene	700	140	<0.1	<0.1	0.11	<0.1	--	--	--	--	--	--	--	<0.1	<0.1	<0.1	<0.1	<0.50	<0.50	--	--	--	--	--	--	
Hexachlorobutadiene	NSE	NSE	<1.00	<1.00	<1.00	<1.00	--	--	--	--	--	--	--	<1.00	<1.00	<1.00	<1.00	<0.50	<0.50	--	--	--	--	--	--	
Isopropylbenzene	NSE	NSE	<0.1	<0.1	<0.1	<0.1	--	--	--	--	--	--	--	<0.1	<0.1	<0.1	<0.1	<0.20	<0.20	--	--	--	--	--	--	
Isopropyl Ether	NSE	NSE	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	<0.50	<0.50	--	--	--	--	--	--	
p-Isopropyltoluene	NSE	NSE	<0.2	<0.2	<0.2	<0.2	--	--	--	--	--	--	--	<0.2	<0.2	<0.2	<0.2	<0.20	<0.20	--	--	--	--	--	--	
Methyl tert Butyl Ether	60	12	<0.1	0.33	<0.1	<0.1	--	--	--	--	--	--	--	<0.1	1.49	<0.1	<0.1	<0.50	<0.50	--	--	--	--	--	--	
Methylene Chloride	5.0	0.5	<0.4	<0.4	<0.4	<0.4	--	--	--	--	--	--	--	<0.4	<0.4	<0.4	<0.4	<1.0	<1.0	--	--	--	--	--	--	
Naphthalene	40	8.0	<1.00	<1.00	<1.00	<1.00	--	--	--	--	--	--	--	<1.00	<1.00	<1.00	<1.00	<0.25	<0.25	--	--	--	--	--	--	
n-Propylbenzene	NSE	NSE	<0.1	<0.1	<0.1	<0.1	--	--	--	--	--	--	--	<0.1	<0.1	<0.1	<0.1	<0.50	<0.50	--	--	--	--	--	--	
Tetrachloroethylene	5.0	0.5	<0.1	<0.1	<0.1	<0.1	--	--	--	--	--	--	--	<0.1	<0.1	<0.1	<0.1	<0.50	<0.50	--	--	--	--	--	--	
1,1,1,2-Tetrachloroethane	70	7.0	<0.1	<0.1	<0.1	<0.1	--	--	--	--	--	--	--	<0.1	<0.1	<0.1	<0.1	<0.25	<0.25	--	--	--	--	--	--	
1,1,1,2,2-Tetrachloroethane	0.2	0.02	<0.1	<0.1	<0.1	<0.1	--	--	--	--	--	--	--	<0.1	<0.1	<0.1	<0.1	<0.20	<0.20	--	--	--	--	--	--	
Toluene	1,000	200	<0.4	<0.4	0.42	<0.4	--	--	--	--	--	--	--	<0.4	<0.4	<0.4	<0.4	<0.20	<0.20	--	--	--	--	--	--	
1,1,2-Trichloroethane	5.0	0.5	--	<0.1	<0.1	<0.1	--	--	--	--	--	--	--	--	<0.1	<0.1	<0.1	<0.1	<0.25	<0.25	--	--	--	--	--	
Total Trimethylbenzenes	480	96	0.21	<0.3	0.66	<0.3	--	--	--	--	--	--	--	0.445	<0.3	<0.3	<0.3	<0.25	<0.25	--	--	--	--	--	--	
1,2,3-Trichlorobenzene	NSE	NSE	<0.5	<0.5	<0.5	<0.5	--	--	--	--	--	--	--	<0.5	<0.5	<0.5	<0.5	<0.25	<0.25	--	--	--	--	--	--	
1,2,4-Trichlorobenzene	70	14	<0.5	<0.5	<0.5	<0.5	--	--	--	--	--	--	--	<0.5	<0.5	<0.5	<0.5	<0.25	<0.25	--	--	--	--	--	--	
1,1,1-Trichloroethane	200	40	<0.2	<0.2	<0.2	<0.2	--	--	--	--	--	--	--	<0.2	<0.2	<0.2	<0.2	<0.50	<0.50	--	--	--	--	--	--	
Trichloroethylene	5.0	0.5	<0.2	<0.2	<0.2	<0.2	--	--	--	--	--	--	--	<0.2	<0.2	<0.2	<0.2	<0.20	<0.20	--	--	--	--	--	--	
Trichlorofluoromethane	NSE	NSE	<0.2	<0.2	<0.2	<0.2	--	--	--	--	--	--	--	<0.2	<0.2	<0.2	<0.2	<0.50	<0.50	--	--	--	--	--	--	
Vinyl Chloride	0.2	0.02	<0.15	<0.15	<0.15	<0.15	--	--	--	--	--	--	--	<0.15	<0.15	<0.15	<0.15	<0.20	<0.20	<0.016	--	--	--	--	--	
Total Xylenes	10,000	1,000	<0.5	<0.5	0.2	<0.5	--	--	--	--	--	--	--	<0.5	<0.5	<0.5	<0.5	<0.50	<0.50	--	--	--	--	--	--	
Metals (µg/l)																										
Arsenic	50	5.0	0.8	--	--	--	--	--	--	--	--	--	--	0.8	--	--	--	--	--	--	--	--	--	--	--	
Barium	2000	400	29.9	--	--	--	--	--	--	--	--	--	--	48.6	--	--	--	--	--	--	--	--	--	--	--	
Cadmium	5.0	0.5	<0.2	--	--	--	--	--	--	--	--	--	--	<0.2	--	--	--	--	--	--	--	--	--	--	--	
Chromium	100	10	<1.60	--	--	--	--	--	--	--	--	--	--	2.40	--	--	--	--	--	--	--	--	--	--	--	
Lead	15	1.5	<0.3	--	--	--	--	--	--	--	--	--	--	<0.3	--	--	--	--	--	--	--	--	--	--	--	
Mercury	2.0	0.2	<0.07	--	--	--	--	--	--	--	--	--	--	<0.07	--	--	--	--	--	--	--	--	--	--	--	
Selenium	50	10	0.8	--	--	--	--	--	--	--	--	--	--	<0.6	--	--	--	--	--	--	--	--	--	--	--	
Silver	50	10	<0.2	--	--	--	--	--	--	--	--	--	--	<0.2	--	--	--	--	--	--	--	--	--	--	--	

SOURCE:
SEH, 2019. Comprehensive Site Investigation Report
NOTE: WDNR Regulatory criteria is not current.

**Table 1
Groundwater Analytical Results**

Analytical Parameters	NR 140 Standards		Well No./Sampling Date																							
			B-11												B-12											
	ES	PAL	2/16/06	5/30/06	8/29/06	11/15/06	2/19/08	5/21/08	3/20/09	7/8/09	10/6/11	11/4/11	2/28/13	3/1/13	2/16/06	5/30/06	8/29/06	11/15/06	2/19/08	5/21/08	3/20/09	7/8/09	10/6/11	11/4/11	2/28/13	3/1/13
Elevation Data																										
Top of PVC	--	--	845.26	845.26	845.26	845.26	845.26	845.26	845.26	845.26	845.26	845.26	845.26	845.26	846.58	846.58	846.58	846.58	846.58	846.58	846.58	846.58	846.58	846.58	846.58	846.58
Top of Screen	--	--	845.26	845.26	845.26	845.26	845.26	845.26	845.26	845.26	845.26	845.26	845.26	845.26	846.58	846.58	846.58	846.58	846.58	846.58	846.58	846.58	846.58	846.58	846.58	846.58
Bottom of Screen	--	--	840.49	840.49	840.49	840.49	840.49	840.49	840.49	840.49	840.49	840.49	840.49	840.49	841.84	841.84	841.84	841.84	841.84	841.84	841.84	841.84	841.84	841.84	841.84	841.84
Groundwater	--	--	--	843.32	842.66	842.94	843.21	843.25	843.56	842.65	843.06	843.28	--	--	--	843.35	842.65	842.91	843.19	843.23	843.19	842.69	843.00	843.28	--	--
pH	NSE	NSE	8.28	--	--	--	--	--	--	--	--	--	--	--	8.67	--	--	--	--	--	--	--	--	--	--	--
DRO (µg/l)	NSE	NSE	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
PAHs¹ (µg/l)																										
Acenaphthene	NSE	NSE	<0.06	<0.06	<0.06	<0.067	<1.6	<0.34	--	--	--	--	--	<0.06	<0.061	<0.061	<0.077	<0.41	<0.35	--	--	--	--	--	--	--
Acenaphthylene	NSE	NSE	<0.06	<0.06	<0.06	<0.067	<3.4	<0.71	--	--	--	--	--	<0.06	<0.061	<0.061	<0.077	<0.85	<0.73	--	--	--	--	--	--	--
Anthracene	3,000	600	<0.09	<0.09	<0.09	<0.100	<0.19	<0.039	--	--	--	--	--	<0.09	<0.092	<0.092	<0.115	<0.047	<0.040	--	--	--	--	--	--	--
Benzo(a)Anthracene	NSE	NSE	<0.1	<0.1	<0.1	<0.111	<0.22	<0.045	--	--	--	--	--	<0.1	<0.102	<0.102	<0.128	<0.054	<0.047	--	--	--	--	--	--	--
Benzo(a)Pyrene	0.2	0.02	<0.02	<0.02	<0.02	<0.022	<0.16	<0.033	--	--	--	--	--	<0.02	<0.02	<0.02	<0.026	<0.040	<0.034	--	--	--	--	--	--	--
Benzo(b)Fluoranthene	0.2	0.02	<0.02	<0.02	<0.02	<0.022	<0.49	<0.10	--	--	--	--	--	<u>0.155</u>	<0.02	<0.02	<u>0.170</u>	<0.12	<0.10	--	--	--	--	--	--	--
Benzo(k)Fluoranthene	NSE	NSE	<0.07	<0.07	<0.07	<0.078	<0.24	<0.051	--	--	--	--	--	<0.07	<0.071	<0.071	<0.090	<0.060	<0.052	--	--	--	--	--	--	--
Benzo(g,h,i)Perylene	NSE	NSE	<0.06	<0.06	<0.06	<0.067	<0.60	<0.12	--	--	--	--	--	<0.06	<0.061	<0.061	0.168	<0.15	<0.13	--	--	--	--	--	--	--
Chrysene	0.2	0.02	<u>0.131</u>	<0.02	<0.02	<u>0.056</u>	<0.20	<0.042	--	--	--	--	--	<u>0.192</u>	<0.02	<0.02	<u>0.192</u>	<0.051	<0.044	--	--	--	--	--	--	--
Dibenzo(a,h)Anthracene	NSE	NSE	<0.11	<0.11	<0.11	<0.122	<0.65	<0.13	--	--	--	--	--	<0.11	<0.112	<0.112	<0.141	<0.16	<0.14	--	--	--	--	--	--	--
Fluoranthene	400	80	<0.12	<0.12	<0.12	0.134	<0.40	<0.084	--	--	--	--	--	0.383	<0.112	<0.112	<0.154	<0.10	<0.086	--	--	--	--	--	--	--
Fluorene	400	80	<0.12	<0.12	<0.12	<0.133	<0.31	<0.064	--	--	--	--	--	<0.12	<0.112	<0.112	<0.154	<0.077	<0.066	--	--	--	--	--	--	--
Indeno(1,2,3-cd)Pyrene	NSE	NSE	<0.12	<0.12	<0.12	<0.133	<0.31	<0.064	--	--	--	--	--	0.145	<0.112	<0.112	<0.154	<0.077	<0.066	--	--	--	--	--	--	--
1-Methyl Naphthalene	NSE	NSE	<0.08	<0.08	<0.08	<0.089	<1.6	<0.33	--	--	--	--	--	<0.08	<0.082	<0.082	<0.103	<0.40	<0.34	--	--	--	--	--	--	--
2-Methyl Naphthalene	NSE	NSE	<0.11	<0.11	<0.11	<0.122	<1.6	<0.32	--	--	--	--	--	<0.11	<0.112	<0.112	<0.141	<0.38	<0.33	--	--	--	--	--	--	--
Naphthalene	40	8.0	<0.11	<0.11	<0.11	<0.122	<2.0	<0.41	--	--	--	--	--	<0.11	<0.112	0.131	<0.141	<0.49	<0.43	--	--	--	--	--	--	--
Phenanthrene	NSE	NSE	<0.11	<0.11	<0.11	<0.122	<0.15	<0.031	--	--	--	--	--	<0.11	<0.112	<0.112	0.211	<0.037	<0.032	--	--	--	--	--	--	--
Pyrene	250	50	<0.1	<0.1	<0.1	<0.111	<0.22	<0.045	--	--	--	--	--	<0.1	<0.102	<0.102	<0.128	<0.054	<0.047	--	--	--	--	--	--	--
VOCs² (µg/l)																										
Benzene	5.0	0.5	<0.15	<0.15	<0.15	<0.15	<0.20	<0.20	--	--	<0.20	--	<0.074	--	0.157	<0.15	<0.15	<0.15	<0.20	<0.20	--	--	<0.20	--	<0.074	--
Bromobenzene	NSE	NSE	<0.1	<0.1	<0.1	<0.1	<0.20	<0.20	--	--	<0.20	--	<0.25	--	<0.1	<0.1	<0.1	<0.1	<0.20	<0.20	--	--	<0.20	--	<0.25	--
Bromochloromethane	NSE	NSE	--	<0.1	<0.1	<0.1	<0.50	<0.50	--	--	<0.50	--	<0.40	--	--	<0.1	<0.1	<0.1	<0.50	<0.50	--	--	<0.50	--	<0.40	--
Bromodichloromethane	0.6	0.06	<0.1	<0.1	<0.1	<0.1	<0.20	<0.20	--	--	<0.20	--	<0.17	--	<0.1	<0.1	<0.1	<0.20	<0.20	--	--	<0.20	--	<0.17	--	
Bromomethane	10	1.0	--	<0.15	<0.15	<0.15	<0.20	<0.20	--	--	<0.50	--	<0.31	--	--	<0.15	<0.15	<0.15	<0.20	<0.20	--	--	<0.50	--	<0.31	--
n-Butylbenzene	NSE	NSE	<0.2	<0.2	<0.2	<0.2	<0.20	<0.20	--	--	<0.20	--	<0.13	--	<0.2	<0.2	<0.2	<0.2	<0.20	<0.20	--	--	<0.20	--	<0.13	--
sec-Butylbenzene	NSE	NSE	<0.15	<0.15	<0.15	<0.15	<0.25	<0.25	--	--	<0.25	--	<0.15	--	<0.15	<0.15	<0.15	<0.15	<0.25	<0.25	--	--	<0.25	--	<0.15	--
tert-Butylbenzene	NSE	NSE	<0.15	<0.15	<0.15	<0.15	<0.20	<0.20	--	--	<0.20	--	<0.14	--	<0.15	<0.15	<0.15	<0.15	<0.20	<0.20	--	--	<0.20	--	<0.14	--
Carbon Tetrachloride	5.0	0.5	<0.2	<0.2	<0.2	<0.2	<0.50	<0.50	--	--	<0.80	--	<0.26	--	<0.2	<0.2	<0.2	<0.2	<0.50	<0.50	--	--	<0.80	--	<0.26	--
Chlorobenzene	NSE	NSE	<0.1	<0.1	<0.1	<0.1	<0.20	<0.20	--	--	<0.20	--	<0.14	--	<0.1	<0.1	<0.1	<0.1	<0.20	<0.20	--	--	<0.20	--	<0.14	--
Chlorodibromomethane	NSE	NSE	<0.1	<0.1	<0.1	<0.1	<0.20	<0.20	--	--	<0.20	--	<0.32	--	<0.1	<0.1	<0.1	<0.1	<0.20	<0.20	--	--	<0.20	--	<0.32	--
Chloroethane	400	80	<0.6	<0.6	<0.6	<0.6	<1.0	<1.0	--	--	<1.0	--	<0.34	--	<0.6	<0.6	<0.6	<0.6	<1.0	<1.0	--	--	<1.0	--	<0.34	--
Chloroform	6.0	0.6	<0.1	<0.1	<0.1	<0.1	<0.20	<0.20	--	--	<0.20	--	<0.20	--	<0.1	<0.1	<0.1	<0.1	<0.20	<0.20	--	--	<0.20	--	<0.20	--
Chloromethane	3.0	0.3	<0.2	<0.2	<0.2	<0.2	<0.20	<0.20	--	--	<0.30	--	<0.18	--	<0.2	0.26	<0.2	0.29	<0.20	<0.20	--	--	<0.30	--	<0.18	--
o-Chlorotoluene	NSE	NSE	<0.1	<0.1	<0.1	<0.1	<0.50	<0.50	--	--	<0.50	--	<0.21	--	<0.1	<0.1	<0.1	<0.1	<0.50	<0.50	--	--	<0.50	--	<0.21	--
p-Chlorotoluene	NSE	NSE	<0.2	<0.2	<0.2	<0.2	<0.20	<0.20	--	--	<0.20	--	<0.20	--	<0.2	<0.2	<0.2	<0.2	<0.20	<0.20	--	--	<0.20	--	<0.20	--
1,2-Dibromo-3-chloropropane	0.2	0.02	<0.3	<0.35	<0.35	<0.35	<0.50	<0.50	--	--	<0.50	--	<0.87	--	<0.3	<0.35	<0.35	<0.35	<0.50	<0.50	--	--	<0.50	--	<0.87	--
1,2-Dibromoethane	0.05	0.005	<0.1	<0.1	<0.1	<0.1	<0.20	<0.20	--	--	<0.20	--	<0.36	--	<0.1	<0.1	<0.1	<0.1	<0.20	<0.20	--	--	<0.20	--	<0.36	--

SOURCE:
SEH, 2019. Comprehensive Site Investigation Report
NOTE: WDNR Regulatory criteria is not current.

**Table 1
Groundwater Analytical Results**

Analytical Parameters	NR 140 Standards		Well No./Sampling Date																							
	ES	PAL	MW-1												MW-2											
			2/16/06	5/30/06	8/29/06	11/15/06	2/19/08	5/21/08	3/20/09	7/8/09	10/5/11	11/4/11	2/28/13	3/1/13	2/16/06	5/30/06	8/29/06	11/15/06	2/19/08	5/21/08	3/20/09	7/8/09	10/5/11	11/4/11	2/28/13	3/1/13
Elevation Data																										
Top of PVC	--	--	850.02	850.02	850.02	850.02	850.02	850.02	850.02	850.02	850.02	850.02	850.02	850.02	850.64	850.64	850.64	850.64	850.64	850.64	850.64	850.64	850.64	850.64	850.64	850.64
Top of Screen	--	--	845.02	845.02	845.02	845.02	845.02	845.02	845.02	845.02	845.02	845.02	845.02	845.02	845.52	845.52	845.52	845.52	845.52	845.52	845.52	845.52	845.52	845.52	845.52	845.52
Bottom of Screen	--	--	835.02	835.02	835.02	835.02	835.02	835.02	835.02	835.02	835.02	835.02	835.02	835.02	835.52	835.52	835.52	835.52	835.52	835.52	835.52	835.52	835.52	835.52	835.52	835.52
Groundwater	--	--	844.13	844.93	843.85	844.12	844.15	844.60	845.71	843.91	844.32	844.55	--	--	843.55	844.03	843.08	843.41	843.67	843.66	845.36	843.17	843.14	843.80	844.03	--
pH	NSE	NSE	7.34	--	--	--	--	--	--	--	--	--	--	--	7.34	--	--	--	--	--	--	--	--	--	--	--
DRO (µg/l)	NSE	NSE	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
PAHs¹ (µg/l)																										
Acenaphthene	NSE	NSE	<0.06	<0.06	<0.06	<0.067	0.39	<0.36	--	--	--	--	--	--	<0.06	<0.06	<0.06	<0.077	<0.39	<0.34	--	--	--	--	--	--
Acenaphthylene	NSE	NSE	<0.06	<0.06	<0.06	<0.067	<0.81	<0.76	--	--	--	--	--	--	<0.06	<0.06	<0.06	<0.077	<0.82	<0.71	--	--	--	--	--	--
Anthracene	3,000	600	<0.09	<0.09	<0.09	<0.1	<0.045	<0.042	--	--	--	--	--	--	<0.09	<0.09	<0.09	<0.115	<0.045	<0.039	--	--	--	--	--	--
Benzo(a)Anthracene	NSE	NSE	<0.1	<0.1	<0.1	<0.111	<0.052	<0.048	--	--	--	--	--	--	<0.1	<0.1	<0.1	<0.128	<0.052	<0.045	--	--	--	--	--	--
Benzo(a)Pyrene	0.2	0.02	<0.02	<0.02	<0.02	<0.022	<0.038	<0.035	--	--	--	--	--	--	<u>0.048</u>	<0.02	<0.02	<0.026	<0.038	<0.033	--	--	--	--	--	--
Benzo(b)Fluoranthene	0.2	0.02	<u>0.052</u>	<0.02	<0.02	<0.022	<0.12	<0.11	--	--	--	--	--	--	<0.02	<0.02	<0.02	<0.026	<0.12	<0.10	--	--	--	--	--	--
Benzo(k)Fluoranthene	NSE	NSE	<0.07	<0.07	<0.07	<0.078	<0.058	<0.054	--	--	--	--	--	--	<0.07	<0.07	<0.07	<0.090	<0.058	<0.051	--	--	--	--	--	--
Benzo(g,h,i)Perylene	NSE	NSE	0.073	<0.06	<0.06	<0.067	<0.14	<0.13	--	--	--	--	--	--	<0.06	<0.06	<0.06	<0.077	<0.14	<0.12	--	--	--	--	--	--
Chrysene	0.2	0.02	<u>0.054</u>	<0.02	<0.02	<0.022	<0.048	<0.045	--	--	--	--	--	--	<0.02	<0.02	<0.02	<0.026	<0.049	<0.042	--	--	--	--	--	--
Dibenzo(a,h)Anthracene	NSE	NSE	<0.11	<0.11	<0.11	<0.122	<0.15	<0.14	--	--	--	--	--	--	<0.11	<0.11	<0.11	<0.141	<0.15	<0.13	--	--	--	--	--	--
Fluoranthene	400	80	<0.12	<0.12	<0.12	<0.133	<0.095	<0.089	--	--	--	--	--	--	<0.12	<0.12	<0.12	<0.154	<0.096	<0.084	--	--	--	--	--	--
Fluorene	400	80	<0.12	<0.12	<0.12	<0.133	<0.073	<0.068	--	--	--	--	--	--	<0.12	<0.12	<0.12	<0.154	<0.074	<0.064	--	--	--	--	--	--
Indeno(1,2,3-cd)Pyrene	NSE	NSE	<0.12	<0.12	<0.12	<0.133	<0.073	<0.068	--	--	--	--	--	--	<0.12	<0.12	<0.12	<0.154	<0.074	<0.064	--	--	--	--	--	--
1-Methyl Naphthalene	NSE	NSE	<0.08	<0.08	<0.08	<0.089	<0.38	<0.35	--	--	--	--	--	--	<0.08	<0.08	<0.08	<0.103	<0.38	<0.33	--	--	--	--	--	--
2-Methyl Naphthalene	NSE	NSE	<0.11	<0.11	<0.11	<0.122	<0.36	<0.34	--	--	--	--	--	--	<0.11	<0.11	<0.11	<0.141	<0.37	<0.32	--	--	--	--	--	--
Naphthalene	40	8.0	<0.11	<0.11	<0.11	<0.122	<0.47	<0.44	--	--	--	--	--	--	<0.11	<0.11	<0.11	<0.141	<0.48	<0.41	--	--	--	--	--	--
Phenanthrene	NSE	NSE	<0.11	<0.11	<0.11	<0.122	<0.035	<0.033	--	--	--	--	--	--	<0.11	<0.11	<0.11	<0.141	0.13	<0.031	--	--	--	--	--	--
Pyrene	250	50	<0.1	<0.1	<0.1	<0.111	<0.052	<0.048	--	--	--	--	--	--	<0.1	<0.1	<0.1	<0.128	<0.052	<0.045	--	--	--	--	--	--
VOCs² (µg/l)																										
Benzene	5.0	0.5	<0.15	<0.15	<0.15	<0.15	--	--	--	--	--	--	--	--	<0.15	<0.15	<0.15	<0.15	--	--	--	--	--	--	--	--
Bromobenzene	NSE	NSE	<0.1	<0.1	<0.1	0.18	--	--	--	--	--	--	--	--	<0.1	<0.1	<0.1	0.10	--	--	--	--	--	--	--	--
Bromochloromethane	NSE	NSE	--	<0.1	<0.1	<0.1	--	--	--	--	--	--	--	--	--	<0.1	<0.1	<0.1	<0.1	--	--	--	--	--	--	--
Bromodichloromethane	0.6	0.06	<0.1	<0.1	<0.1	<0.1	--	--	--	--	--	--	--	--	<0.1	<0.1	<0.1	<0.1	--	--	--	--	--	--	--	--
Bromomethane	10	1.0	--	<0.15	<0.15	<0.15	--	--	--	--	--	--	--	--	--	<0.15	<0.15	<0.15	<0.15	--	--	--	--	--	--	--
n-Butylbenzene	NSE	NSE	<0.2	<0.2	<0.2	<0.2	--	--	--	--	--	--	--	--	<0.2	<0.2	<0.2	<0.2	--	--	--	--	--	--	--	--
sec-Butylbenzene	NSE	NSE	<0.15	<0.15	<0.15	<0.15	--	--	--	--	--	--	--	--	<0.15	<0.15	<0.15	<0.15	<0.15	--	--	--	--	--	--	--
tert-Butylbenzene	NSE	NSE	<0.15	<0.15	<0.15	<0.15	--	--	--	--	--	--	--	--	<0.15	<0.15	<0.15	<0.15	<0.15	--	--	--	--	--	--	--
Carbon Tetrachloride	5.0	0.5	<0.2	<0.2	<0.2	<0.2	--	--	--	--	--	--	--	--	<0.2	<0.2	<0.2	<0.2	<0.2	--	--	--	--	--	--	--
Chlorobenzene	NSE	NSE	<0.1	<0.1	<0.1	<0.1	--	--	--	--	--	--	--	--	<0.1	<0.1	<0.1	<0.1	<0.1	--	--	--	--	--	--	--
Chlorodibromomethane	NSE	NSE	<0.1	<0.1	<0.1	<0.1	--	--	--	--	--	--	--	--	<0.1	<0.1	<0.1	<0.1	<0.1	--	--	--	--	--	--	--
Chloroethane	400	80	<0.6	<0.6	<0.6	<0.6	--	--	--	--	--	--	--	--	<0.6	<0.6	<0.6	<0.6	<0.6	--	--	--	--	--	--	--
Chloroform	6.0	0.6	<0.1	<0.1	<0.1	<0.1	--	--	--	--	--	--	--	--	<0.1	<0.1	<0.1	<0.1	<0.1	--	--	--	--	--	--	--
Chloromethane	3.0	0.3	<0.2	<0.2	<0.2	0.23	--	--	--	--	--	--	--	--	<0.2	<0.2	<0.2	<0.2	<0.2	--	--	--	--	--	--	--
o-Chlorotoluene	NSE	NSE	<0.1	<0.1	<0.1	<0.1	--	--	--	--	--	--	--	--	<0.1	<0.1	<0.1	<0.1	<0.1	--	--	--	--	--	--	--
p-Chlorotoluene	NSE	NSE	<0.2	<0.2	<0.2	<0.2	--	--	--	--	--	--	--	--	<0.2	<0.2	<0.2	<0.2	<0.2	--	--	--	--	--	--	--
1,2-Dibromo-3-chloropropane	0.2	0.02	<0.3	<0.35	<0.35	<0.35	--	--	--	--	--	--	--	--	<0.3	<0.35	<0.35	<0.35	<0.35	--	--	--	--	--	--	--
1,2-Dibromoethane	0.05	0.005	<0.1	<0.1	<0.1	<0.1	--	--	--	--	--	--	--	--	<0.1	<0.1	<0.1	<0.1	<0.1	--	--	--	--	--	--	--

SOURCE:
SEH, 2019. Comprehensive Site Investigation Report
NOTE: WDNR Regulatory criteria is not current.

**Table 1
Groundwater Analytical Results**

Analytical Parameters	NR 140 Standards		Well No./Sampling Date																							
	ES	PAL	MW-1												MW-2											
			2/16/06	5/30/06	8/29/06	11/15/06	2/19/08	5/21/08	3/20/09	7/8/09	10/5/11	11/4/11	2/28/13	3/1/13	2/16/06	5/30/06	8/29/06	11/15/06	2/19/08	5/21/08	3/20/09	7/8/09	10/5/11	11/4/11	2/28/13	3/1/13
VOCs² (µg/l)																										
1,2-Dichlorobenzene	600	60	<0.75	<0.75	<0.75	<0.75	--	--	--	--	--	--	--	--	<0.75	<0.75	<0.75	<0.75	--	--	--	--	--	--	--	--
1,3-Dichlorobenzene	1,250	125	<0.15	<0.15	<0.15	<0.15	--	--	--	--	--	--	--	--	<0.15	<0.15	<0.15	<0.15	--	--	--	--	--	--	--	--
1,4-Dichlorobenzene	75	15	<0.75	<0.75	<0.75	<0.75	--	--	--	--	--	--	--	--	<0.75	<0.75	<0.75	<0.75	--	--	--	--	--	--	--	--
Dichlorodifluoromethane	1,000	200	<0.25	<0.25	<0.25	<0.25	--	--	--	--	--	--	--	--	<0.25	<0.25	<0.25	<0.25	--	--	--	--	--	--	--	--
1,1-Dichloroethane	850	85	<0.15	<0.15	<0.15	<0.15	--	--	--	--	--	--	--	--	<0.15	<0.15	<0.15	<0.15	--	--	--	--	--	--	--	--
1,2-Dichloroethane	5.0	0.5	<0.1	<0.1	<0.1	<0.1	--	--	--	--	--	--	--	--	<0.1	<0.1	<0.1	<0.1	--	--	--	--	--	--	--	--
1,1-Dichloroethylene	7.0	0.7	<0.15	<0.15	<0.15	<0.15	--	--	--	--	--	--	--	--	<0.15	<0.15	<0.15	<0.15	--	--	--	--	--	--	--	--
cis-1,2-Dichloroethylene	70	7.0	<0.2	<0.2	<0.2	<0.2	--	--	--	--	--	--	--	--	<0.2	<0.2	<0.2	<0.2	--	--	--	--	--	--	--	--
trans-1,2-Dichloroethylene	100	20	<0.1	<0.1	<0.1	<0.1	--	--	--	--	--	--	--	--	<0.1	<0.1	<0.1	<0.1	--	--	--	--	--	--	--	--
1,2-Dichloropropane	5.0	0.5	<0.1	<0.1	<0.1	<0.1	--	--	--	--	--	--	--	--	<0.1	<0.1	<0.1	<0.1	--	--	--	--	--	--	--	--
1,3-Dichloropropane	NSE	NSE	<0.1	<0.1	<0.1	<0.1	--	--	--	--	--	--	--	--	<0.1	<0.1	<0.1	<0.1	--	--	--	--	--	--	--	--
2,2-Dichloropropane	NSE	NSE	<0.1	<0.1	<0.1	<0.1	--	--	--	--	--	--	--	--	<0.1	<0.1	<0.1	<0.1	--	--	--	--	--	--	--	--
1,1-Dichloropropene	NSE	NSE	<0.2	<0.3	<0.3	<0.3	--	--	--	--	--	--	--	--	<0.2	<0.3	<0.3	<0.3	--	--	--	--	--	--	--	--
cis-1,3-Dichloropropene	0.2	0.02	<0.1	<0.1	<0.1	<0.1	--	--	--	--	--	--	--	--	<0.1	<0.1	<0.1	<0.1	--	--	--	--	--	--	--	--
trans-1,3-Dichloropropene	0.2	0.02	<0.1	<0.1	<0.1	<0.1	--	--	--	--	--	--	--	--	<0.1	<0.1	<0.1	<0.1	--	--	--	--	--	--	--	--
Ethylbenzene	700	140	<0.1	<0.1	<0.1	0.11	--	--	--	--	--	--	--	--	<0.1	<0.1	<0.1	<0.1	--	--	--	--	--	--	--	--
Hexachlorobutadiene	NSE	NSE	<1.00	<1.00	<1.00	<1.00	--	--	--	--	--	--	--	--	<1.00	<1.00	<1.00	<1.00	--	--	--	--	--	--	--	--
Isopropylbenzene	NSE	NSE	<0.1	<0.1	<0.1	<0.1	--	--	--	--	--	--	--	--	<0.1	<0.1	<0.1	<0.1	--	--	--	--	--	--	--	--
Isopropyl Ether	NSE	NSE	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
p-Isopropyltoluene	NSE	NSE	<0.2	<0.2	<0.2	<0.2	--	--	--	--	--	--	--	--	<0.2	<0.2	<0.2	<0.2	--	--	--	--	--	--	--	--
Methyl tert Butyl Ether	60	12	<0.1	<0.1	<0.1	<0.1	--	--	--	--	--	--	--	--	<0.1	0.14	<0.1	0.16	--	--	--	--	--	--	--	--
Methylene Chloride	5.0	0.5	<0.4	<0.4	<0.4	<0.4	--	--	--	--	--	--	--	--	<0.4	<0.4	<0.4	<0.4	--	--	--	--	--	--	--	--
Naphthalene	40	8.0	<1.00	<1.00	<1.00	<1.00	--	--	--	--	--	--	--	--	<1.00	<1.00	<1.00	<1.00	--	--	--	--	--	--	--	--
n-Propylbenzene	NSE	NSE	<0.1	<0.1	<0.1	<0.1	--	--	--	--	--	--	--	--	<0.1	<0.1	<0.1	<0.1	--	--	--	--	--	--	--	--
Tetrachloroethylene	5.0	0.5	<0.1	<0.1	<0.1	<0.1	--	--	--	--	--	--	--	--	<0.1	<0.1	<0.1	<0.1	--	--	--	--	--	--	--	--
1,1,1,2-Tetrachloroethane	70	7.0	<0.1	<0.1	<0.1	<0.1	--	--	--	--	--	--	--	--	<0.1	<0.1	<0.1	<0.1	--	--	--	--	--	--	--	--
1,1,1,2,2-Tetrachloroethane	0.2	0.02	<0.1	<0.1	<0.1	<0.1	--	--	--	--	--	--	--	--	<0.1	<0.1	<0.1	<0.1	--	--	--	--	--	--	--	--
Toluene	1,000	200	<0.4	<0.4	<0.4	<0.4	--	--	--	--	--	--	--	--	<0.4	<0.4	<0.4	<0.4	--	--	--	--	--	--	--	--
1,1,2-Trichloroethane	5.0	0.5	--	<0.1	<0.1	<0.1	--	--	--	--	--	--	--	--	--	<0.1	<0.1	<0.1	<0.1	--	--	--	--	--	--	--
Total Trimethylbenzenes	480	96	<0.3	<0.3	<0.3	<0.3	--	--	--	--	--	--	--	--	<0.3	<0.3	<0.3	<0.3	--	--	--	--	--	--	--	--
1,2,3-Trichlorobenzene	NSE	NSE	<0.5	<0.5	<0.5	<0.5	--	--	--	--	--	--	--	--	<0.5	<0.5	<0.5	<0.5	--	--	--	--	--	--	--	--
1,2,4-Trichlorobenzene	70	14	<0.5	<0.5	<0.5	<0.5	--	--	--	--	--	--	--	--	<0.5	<0.5	<0.5	<0.5	--	--	--	--	--	--	--	--
1,1,1-Trichloroethane	200	40	<0.2	<0.2	<0.2	<0.2	--	--	--	--	--	--	--	--	<0.2	<0.2	<0.2	<0.2	--	--	--	--	--	--	--	--
Trichloroethylene	5.0	0.5	<0.2	<0.2	<0.2	<0.2	--	--	--	--	--	--	--	--	<0.2	<0.2	<0.2	<0.2	--	--	--	--	--	--	--	--
Trichlorofluoromethane	NSE	NSE	<0.2	<0.2	<0.2	<0.2	--	--	--	--	--	--	--	--	<0.2	<0.2	<0.2	<0.2	--	--	--	--	--	--	--	--
Vinyl Chloride	0.2	0.02	<0.15	<0.15	<0.15	<0.15	--	--	--	--	--	--	--	--	<0.15	<0.15	<0.15	<0.15	--	--	--	--	--	--	--	--
Total Xylenes	10,000	1,000	<0.5	<0.5	<0.5	<0.5	--	--	--	--	--	--	--	--	<0.5	<0.5	<0.5	<0.5	--	--	--	--	--	--	--	--
Metals (µg/l)																										
Arsenic	50	5.0	<0.6	--	--	--	--	--	--	--	--	--	--	--	1.7	--	--	--	--	--	--	--	--	--	--	--
Barium	2000	400	62.5	--	--	--	--	--	--	--	--	--	--	--	34.5	--	--	--	--	--	--	--	--	--	--	--
Cadmium	5.0	0.5	<0.2	--	--	--	--	--	--	--	--	--	--	--	<0.2	--	--	--	--	--	--	--	--	--	--	--
Chromium	100	10	<1.60	--	--	--	--	--	--	--	--	--	--	--	<1.60	--	--	--	--	--	--	--	--	--	--	--
Lead	15	1.5	<0.3	--	--	--	--	--	--	--	--	--	--	--	<0.3	--	--	--	--	--	--	--	--	--	--	--
Mercury	2.0	0.2	<0.07	--	--	--	--	--	--	--	--	--	--	--	<0.07	--	--	--	--	--	--	--	--	--	--	--
Selenium	50	10	0.6	--	--	--	--	--	--	--	--	--	--	--	0.6	--	--	--	--	--	--	--	--	--	--	--
Silver	50	10	<0.2	--	--	--	--	--	--	--	--	--	--	--	<0.2	--	--	--	--	--	--	--	--	--	--	--

SOURCE:
SEH, 2019. Comprehensive Site Investigation Report
NOTE: WDNr Regulatory criteria is not current.

**Table 1
Groundwater Analytical Results**

Analytical Parameters	NR 140 Standards		Well No./Sampling Date																					
			MW-3										MW-4											
	ES	PAL	2/16/06	5/30/06	8/29/06	11/15/06	2/19/08	5/21/08	3/20/09	7/8/09	2/28/13	3/1/13	2/16/06	5/30/06	8/29/06	11/15/06	2/19/08	5/21/08	3/20/09	7/8/09	10/5/11	11/4/11	2/28/13	3/1/13
Elevation Data																								
Top of PVC	--	--	848.91	848.91	848.91	848.91	848.91	848.91	848.91	848.91	848.91	848.91	845.74	845.74	845.74	845.74	845.74	845.74	845.74	845.74	845.74	845.74	845.74	845.74
Top of Screen	--	--	844.13	844.13	844.13	844.13	844.13	844.13	844.13	844.13	844.13	844.13	843.96	843.96	843.96	843.96	843.96	843.96	843.96	843.96	843.99	843.99	843.99	843.99
Bottom of Screen	--	--	834.13	834.13	834.13	834.13	834.13	834.13	834.13	834.13	834.13	834.13	833.96	833.96	833.96	833.96	833.96	833.96	833.96	833.96	833.99	833.99	833.99	833.99
Groundwater	--	--	843.02	843.51	842.55	842.87	843.11	843.18	844.98	842.66	--	--	842.76	843.51	842.49	842.84	842.77	843.08	845.24	842.46	842.54	843.12	--	--
pH	NSE	NSE	7.37	--	--	--	--	--	--	--	--	--	7.48	--	--	--	--	--	--	--	--	--	--	--
DRO (µg/l)	NSE	NSE	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
PAHs¹ (µg/l)																								
Acenaphthene	NSE	NSE	<0.06	<0.06	<0.06	<0.067	--	--	--	--	--	--	<0.06	<0.06	<0.06	<0.067	--	--	--	--	--	--	--	--
Acenaphthylene	NSE	NSE	<0.06	<0.06	<0.06	<0.067	--	--	--	--	--	--	<0.06	<0.06	<0.06	<0.067	--	--	--	--	--	--	--	--
Anthracene	3,000	600	<0.09	<0.09	<0.09	<0.1	--	--	--	--	--	--	<0.09	<0.09	<0.09	<0.1	--	--	--	--	--	--	--	--
Benzo(a)Anthracene	NSE	NSE	<0.1	<0.1	<0.1	<0.111	--	--	--	--	--	--	<0.1	<0.1	<0.1	<0.111	--	--	--	--	--	--	--	--
Benzo(a)Pyrene	0.2	0.02	<0.02	<0.02	<0.02	<0.022	--	--	--	--	--	--	<0.02	<0.02	<0.02	<0.022	--	--	--	--	--	--	--	--
Benzo(b)Fluoranthene	0.2	0.02	<0.02	<0.02	<0.02	<0.022	--	--	--	--	--	--	<0.02	<0.02	<0.02	<0.022	--	--	--	--	--	--	--	--
Benzo(k)Fluoranthene	NSE	NSE	<0.07	<0.07	<0.07	<0.078	--	--	--	--	--	--	<0.07	<0.07	<0.07	<0.078	--	--	--	--	--	--	--	--
Benzo(g,h,i)Perylene	NSE	NSE	<0.06	<0.06	<0.06	<0.067	--	--	--	--	--	--	<0.06	<0.06	<0.06	<0.067	--	--	--	--	--	--	--	--
Chrysene	0.2	0.02	<0.02	<0.02	<0.02	<0.022	--	--	--	--	--	--	<0.02	<0.02	<0.02	<0.022	--	--	--	--	--	--	--	--
Dibenzo(a,h)Anthracene	NSE	NSE	<0.11	<0.11	<0.11	<0.122	--	--	--	--	--	--	<0.11	<0.11	<0.11	<0.122	--	--	--	--	--	--	--	--
Fluoranthene	400	80	<0.12	<0.12	<0.12	<0.133	--	--	--	--	--	--	<0.12	<0.12	<0.12	<0.133	--	--	--	--	--	--	--	--
Fluorene	400	80	<0.12	<0.12	<0.12	<0.133	--	--	--	--	--	--	<0.12	<0.12	<0.12	<0.133	--	--	--	--	--	--	--	--
Indeno(1,2,3-cd)Pyrene	NSE	NSE	<0.12	<0.12	<0.12	<0.133	--	--	--	--	--	--	<0.12	<0.12	<0.12	<0.133	--	--	--	--	--	--	--	--
1-Methyl Naphthalene	NSE	NSE	<0.08	<0.08	<0.08	<0.089	--	--	--	--	--	--	<0.08	<0.08	<0.08	<0.089	--	--	--	--	--	--	--	--
2-Methyl Naphthalene	NSE	NSE	<0.11	<0.11	<0.11	<0.122	--	--	--	--	--	--	<0.11	<0.11	<0.11	<0.122	--	--	--	--	--	--	--	--
Naphthalene	40	8.0	<0.11	<0.11	<0.11	<0.122	--	--	--	--	--	--	<0.11	<0.11	<0.11	<0.122	--	--	--	--	--	--	--	--
Phenanthrene	NSE	NSE	<0.11	<0.11	<0.11	<0.122	--	--	--	--	--	--	<0.11	<0.11	<0.11	<0.122	--	--	--	--	--	--	--	--
Pyrene	250	50	<0.1	<0.1	<0.1	<0.111	--	--	--	--	--	--	<0.1	<0.1	<0.1	<0.111	--	--	--	--	--	--	--	--
VOCs² (µg/l)																								
Benzene	5.0	0.5	<0.15	<0.15	<0.15	<0.15	<0.20	<0.20	--	--	--	--	<0.15	<0.15	0.15	<0.15	--	--	--	--	<0.20	--	--	--
Bromobenzene	NSE	NSE	<0.1	<0.1	<0.1	<0.1	<0.20	<0.20	--	--	--	--	<0.1	<0.1	<0.1	<0.1	--	--	--	--	<0.20	--	--	--
Bromochloromethane	NSE	NSE	--	<0.1	<0.1	<0.1	<0.50	<0.50	--	--	--	--	--	<0.1	<0.1	<0.1	--	--	--	--	<0.50	--	--	--
Bromodichloromethane	0.6	0.06	<0.1	<0.1	<0.1	<0.1	<0.20	<0.20	--	--	--	--	<0.1	<0.1	<0.1	<0.1	--	--	--	--	<0.20	--	--	--
Bromomethane	10	1.0	--	<0.15	<0.15	0.18	<0.20	<0.20	--	--	--	--	--	<0.15	<0.15	<0.15	--	--	--	--	<0.50	--	--	--
n-Butylbenzene	NSE	NSE	<0.2	<0.2	<0.2	<0.2	<0.20	<0.20	--	--	--	--	<0.2	<0.2	<0.2	<0.2	--	--	--	--	<0.20	--	--	--
sec-Butylbenzene	NSE	NSE	<0.15	<0.15	<0.15	<0.15	<0.25	<0.25	--	--	--	--	<0.15	<0.15	<0.15	<0.15	--	--	--	--	<0.25	--	--	--
tert-Butylbenzene	NSE	NSE	<0.15	<0.15	<0.15	<0.15	<0.20	<0.20	--	--	--	--	<0.15	<0.15	<0.15	<0.15	--	--	--	--	<0.20	--	--	--
Carbon Tetrachloride	5.0	0.5	<0.2	<0.2	<0.2	<0.2	<0.50	<0.50	--	--	--	--	<0.2	<0.2	<0.2	<0.2	--	--	--	--	<0.80	--	--	--
Chlorobenzene	NSE	NSE	<0.1	<0.1	<0.1	<0.1	<0.20	<0.20	--	--	--	--	<0.1	<0.1	<0.1	<0.1	--	--	--	--	<0.20	--	--	--
Chlorodibromomethane	NSE	NSE	<0.1	<0.1	<0.1	<0.1	<0.20	<0.20	--	--	--	--	<0.1	<0.1	<0.1	<0.1	--	--	--	--	<0.20	--	--	--
Chloroethane	400	80	<0.6	<0.6	<0.6	<0.6	<1.0	<1.0	--	--	--	--	<0.6	<0.6	<0.6	<0.6	--	--	--	--	<1.0	--	--	--
Chloroform	6.0	0.6	<0.1	<0.1	<0.1	<0.1	<0.20	<0.20	--	--	--	--	<0.1	<0.1	<0.1	<0.1	--	--	--	--	<0.20	--	--	--
Chloromethane	3.0	0.3	<0.2	<0.2	<0.2	<0.2	<0.20	<0.20	--	--	--	--	<0.2	<0.2	<0.2	<0.2	--	--	--	--	<0.30	--	--	--
o-Chlorotoluene	NSE	NSE	<0.1	<0.1	<0.1	<0.1	<0.50	<0.50	--	--	--	--	<0.1	<0.1	<0.1	<0.1	--	--	--	--	<0.50	--	--	--
p-Chlorotoluene	NSE	NSE	<0.2	<0.2	<0.2	<0.2	<0.20	<0.20	--	--	--	--	<0.2	<0.2	<0.2	<0.2	--	--	--	--	<0.20	--	--	--
1,2-Dibromo-3-chloropropane	0.2	0.02	<0.3	<0.35	<0.35	<0.35	<0.50	<0.50	--	--	--	--	<0.3	<0.35	<0.35	<0.35	--	--	--	--	<0.50	--	--	--
1,2-Dibromoethane	0.05	0.005	<0.1	<0.1	<0.1	<0.1	<0.20	<0.20	--	--	--	--	<0.1	<0.1	<0.1	<0.1	--	--	--	--	<0.20	--	--	--

SOURCE:
SEH, 2019. Comprehensive Site Investigation Report
NOTE: WDNR Regulatory criteria is not current.

**Table 1
Groundwater Analytical Results**

Analytical Parameters	NR 140 Standards		Well No./Sampling Date																						
			MW-3										MW-4												
	ES	PAL	2/16/06	5/30/06	8/29/06	11/15/06	2/19/08	5/21/08	3/20/09	7/8/09	2/28/13	3/1/13	2/16/06	5/30/06	8/29/06	11/15/06	2/19/08	5/21/08	3/20/09	7/8/09	10/5/11	11/4/11	2/28/13	3/1/13	
VOCs² (µg/l)																									
1,2-Dichlorobenzene	600	60	<0.75	<0.75	<0.75	<0.75	<0.20	<0.20	--	--	--	--	<0.75	<0.75	<0.75	<0.75	--	--	--	--	<0.20	--	--	--	
1,3-Dichlorobenzene	1,250	125	<0.15	<0.15	<0.15	<0.15	<0.20	<0.20	--	--	--	--	<0.15	<0.15	<0.15	<0.15	--	--	--	--	<0.20	--	--	--	
1,4-Dichlorobenzene	75	15	<0.75	<0.75	<0.75	<0.75	<0.20	<0.20	--	--	--	--	<0.75	<0.75	<0.75	<0.75	--	--	--	--	<0.50	--	--	--	
Dichlorodifluoromethane	1,000	200	<0.25	<0.25	<0.25	<0.25	<0.50	<0.50	--	--	--	--	<0.25	<0.25	<0.25	<0.25	--	--	--	--	<0.50	--	--	--	
1,1-Dichloroethane	850	85	<0.15	<0.15	<0.15	<0.15	<0.50	<0.50	--	--	--	--	<0.15	<0.15	<0.15	<0.15	--	--	--	--	<0.50	--	--	--	
1,2-Dichloroethane	5.0	0.5	<u>2.29</u>	<u>2.57</u>	<u>1.96</u>	<u>1.67</u>	<u>2.7</u>	<0.50	--	--	--	--	0.296	0.30	0.37	0.41	--	--	--	--	<0.50	--	--	--	
1,1-Dichloroethylene	7.0	0.7	<0.15	<0.15	<0.15	<0.15	<0.50	<0.50	--	--	--	--	<0.15	<0.15	<0.15	<0.15	--	--	--	--	<0.50	--	--	--	
cis-1,2-Dichloroethylene	70	7.0	2.22	2.55	2.05	1.81	2.2	3.1	--	--	--	--	5.57	4.55	4.54	5.24	--	--	--	--	5.8	--	--	--	
trans-1,2-Dichloroethylene	100	20	<0.1	<0.1	<0.1	<0.1	<0.50	<0.50	--	--	--	--	0.138	0.3	<0.1	0.3	--	--	--	--	<0.50	--	--	--	
1,2-Dichloropropane	5.0	0.5	<0.1	<0.1	<0.1	<0.1	<0.50	<0.50	--	--	--	--	<0.1	<0.1	<0.1	<0.1	--	--	--	--	<0.50	--	--	--	
1,3-Dichloropropane	NSE	NSE	<0.1	<0.1	<0.1	<0.1	<0.25	<0.25	--	--	--	--	<0.1	<0.1	<0.1	<0.1	--	--	--	--	<0.25	--	--	--	
2,2-Dichloropropane	NSE	NSE	<0.1	<0.1	<0.1	<0.1	<0.50	<0.50	--	--	--	--	<0.1	<0.1	<0.1	<0.1	--	--	--	--	<0.50	--	--	--	
1,1-Dichloropropene	NSE	NSE	<0.2	<0.3	<0.3	<0.3	<0.50	<0.50	--	--	--	--	<0.2	<0.3	<0.3	0.52	--	--	--	--	<0.50	--	--	--	
cis-1,3-Dichloropropene	0.2	0.02	<0.1	<0.1	<0.1	<0.1	<0.20	<0.20	--	--	--	--	<0.1	<0.1	<0.1	<0.1	--	--	--	--	<0.20	--	--	--	
trans-1,3-Dichloropropene	0.2	0.02	<0.1	<0.1	<0.1	<0.1	<0.20	<0.20	--	--	--	--	<0.1	<0.1	<0.1	<0.1	--	--	--	--	<0.20	--	--	--	
Ethylbenzene	700	140	<0.1	<0.1	<0.1	<0.1	<0.50	<0.50	--	--	--	--	<0.1	<0.1	<0.1	<0.1	--	--	--	--	<0.50	--	--	--	
Hexachlorobutadiene	NSE	NSE	<1.00	<1.00	<1.00	<1.00	<0.50	<0.50	--	--	--	--	<1.00	<1.00	<1.00	<1.00	--	--	--	--	<0.50	--	--	--	
Isopropylbenzene	NSE	NSE	<0.1	<0.1	<0.1	<0.1	<0.20	<0.20	--	--	--	--	<0.1	<0.1	<0.1	<0.1	--	--	--	--	<0.20	--	--	--	
Isopropyl Ether	NSE	NSE	--	--	--	--	<0.50	<0.50	--	--	--	--	--	--	--	--	--	--	--	--	<0.50	--	--	--	
p-Isopropyltoluene	NSE	NSE	<0.2	<0.2	<0.2	0.29	<0.20	<0.20	--	--	--	--	<0.2	<0.2	<0.2	<0.2	--	--	--	--	<0.20	--	--	--	
Methyl tert Butyl Ether	60	12	<0.1	<0.1	<0.1	<0.1	<0.50	<0.50	--	--	--	--	0.112	0.22	<0.1	0.27	--	--	--	--	<0.50	--	--	--	
Methylene Chloride	5.0	0.5	<0.4	<0.4	<0.4	<0.4	<1.0	<1.0	--	--	--	--	<0.4	<0.4	<0.4	<0.4	--	--	--	--	<1.0	--	--	--	
Naphthalene	40	8.0	<1.00	<1.00	<1.00	<1.00	<0.25	<0.25	--	--	--	--	<1.00	<1.00	<1.00	<1.00	--	--	--	--	<0.25	--	--	--	
n-Propylbenzene	NSE	NSE	<0.1	<0.1	<0.1	<0.1	<0.50	<0.50	--	--	--	--	<0.1	<0.1	<0.1	<0.1	--	--	--	--	<0.50	--	--	--	
Tetrachloroethylene	5.0	0.5	<0.1	<0.1	<0.1	<0.1	<0.50	<0.50	--	--	--	--	<0.1	<0.1	<0.1	<0.1	--	--	--	--	<0.50	--	--	--	
1,1,1,2-Tetrachloroethane	70	7.0	<0.1	<0.1	<0.1	<0.1	<0.25	<0.25	--	--	--	--	<0.1	<0.1	<0.1	<0.1	--	--	--	--	<0.25	--	--	--	
1,1,2,2-Tetrachloroethane	0.2	0.02	<0.1	<0.1	<0.1	<0.1	<0.20	<0.20	--	--	--	--	<0.1	<0.1	<0.1	<0.1	--	--	--	--	<0.20	--	--	--	
Toluene	1,000	200	<0.4	<0.4	<0.4	<0.4	0.29	0.29	--	--	--	--	<0.4	<0.4	0.44	<0.4	--	--	--	--	13	--	--	--	
1,1,2-Trichloroethane	5.0	0.5	--	<0.1	<0.1	<0.1	<0.25	<0.25	--	--	--	--	--	<0.1	<0.1	<0.1	<0.1	--	--	--	--	<0.25	--	--	--
Total Trimethylbenzenes	480	96	<0.3	<0.3	<0.3	<0.3	<0.40	<0.40	--	--	--	--	<0.3	<0.3	<0.3	<0.3	--	--	--	--	--	--	--	--	
1,2,3-Trichlorobenzene	NSE	NSE	<0.5	<0.5	<0.5	<0.5	<0.25	<0.25	--	--	--	--	<0.5	<0.5	<0.5	<0.5	--	--	--	--	<0.25	--	--	--	
1,2,4-Trichlorobenzene	70	14	<0.5	<0.5	<0.5	<0.5	<0.25	<0.25	--	--	--	--	<0.5	<0.5	<0.5	<0.5	--	--	--	--	<0.25	--	--	--	
1,1,1-Trichloroethane	200	40	<0.2	<0.2	<0.2	<0.2	<0.50	<0.50	--	--	--	--	<0.2	<0.2	<0.2	<0.2	--	--	--	--	<0.50	--	--	--	
Trichloroethylene	5.0	0.5	<u>0.535</u>	<u>0.61</u>	<u>0.80</u>	0.39	<0.30	<u>0.67</u>	--	--	--	--	<0.2	<0.2	<0.2	<0.2	--	--	--	--	<0.20	--	--	--	
Trichlorofluoromethane	NSE	NSE	<0.2	<0.2	<0.2	<0.2	<0.50	<0.50	--	--	--	--	<0.2	<0.2	<0.2	<0.2	--	--	--	--	<0.50	--	--	--	
Vinyl Chloride	0.2	0.02	<0.15	<0.15	<0.15	<0.15	<0.20	<0.20	--	--	--	--	<0.15	<0.15	<0.15	<0.15	--	--	--	--	<0.20	--	--	--	
Total Xylenes	10,000	1,000	<0.5	<0.5	<0.5	<0.5	<0.50	<0.50	--	--	--	--	<0.5	<0.5	<0.5	<0.5	--	--	--	--	<0.50	--	--	--	
Metals (µg/l)																									
Arsenic	50	5.0	3.4	--	--	--	--	--	--	--	--	--	<0.6	--	--	--	--	--	--	--	--	--	--	--	
Barium	2000	400	33.7	--	--	--	--	--	--	--	--	--	48.2	--	--	--	--	--	--	--	--	--	--	--	
Cadmium	5.0	0.5	<0.2	--	--	--	--	--	--	--	--	--	<u>0.77</u>	--	--	--	0.020	<0.12	--	--	--	--	--	--	
Chromium	100	10	<1.60	--	--	--	--	--	--	--	--	--	2.80	--	--	--	--	--	--	--	--	--	--	--	
Lead	15	1.5	<0.3	--	--	--	--	--	--	--	--	--	<0.3	--	--	--	--	--	--	--	--	--	--	--	
Mercury	2.0	0.2	<0.07	--	--	--	--	--	--	--	--	--	<0.07	--	--	--	--	--	--	--	--	--	--	--	
Selenium	50	10	<0.6	--	--	--	--	--	--	--	--	--	0.7	--	--	--	--	--	--	--	--	--	--	--	
Silver	50	10	<0.2	--	--	--	--	--	--	--	--	--	<0.2	--	--	--	--	--	--	--	--	--	--	--	

SOURCE:
SEH, 2019. Comprehensive Site Investigation Report
NOTE: WDNR Regulatory criteria is not current.

**Table 1
Groundwater Analytical Results**

Analytical Parameters	NR 140 Standards		Well No./Sampling Date													
	ES	PAL	MW-5													
			2/16/06	5/30/06	5/30/06 Dup	8/29/06	11/15/06	2/19/08	5/21/08	3/19/09	3/19/09 Dup	7/8/09	10/5/11	11/4/11	2/28/13	3/1/13
Elevation Data																
Top of PVC	--	--	848.62	848.62	848.62	848.62	848.62	848.62	848.62	848.62	848.62	848.62	848.62	848.62	848.62	848.62
Top of Screen	--	--	843.75	843.75	843.75	843.75	843.75	843.75	843.75	843.75	843.75	843.75	843.75	843.75	843.75	843.75
Bottom of Screen	--	--	833.75	833.75	833.75	833.75	833.75	833.75	833.75	833.75	833.75	833.75	833.75	833.75	833.75	833.75
Groundwater	--	--	842.81	843.53	--	842.40	842.73	843.12	843.05	844.48	--	842.50	842.70	843.07	843.13	--
pH	NSE	NSE	7.38	--	--	--	--	--	--	--	--	--	--	--	--	--
DRO (µg/l)	NSE	NSE	--	--	--	--	--	--	--	--	--	--	--	--	--	--
PAHs¹ (µg/l)																
Acenaphthene	NSE	NSE	<0.06	<0.06	<0.06	<0.06	<0.067	<0.37	<0.35	--	--	--	--	--	--	--
Acenaphthylene	NSE	NSE	<0.06	<0.06	<0.06	<0.06	<0.067	<0.77	<0.73	--	--	--	--	--	--	--
Anthracene	3,000	600	<0.09	<0.09	<0.09	<0.09	<0.1	<0.042	<0.040	--	--	--	--	--	--	--
Benzo(a)Anthracene	NSE	NSE	<0.1	<0.1	<0.1	<0.1	<0.111	<0.049	<0.047	--	--	--	--	--	--	--
Benzo(a)Pyrene	0.2	0.02	<0.02	<0.02	<0.02	<0.02	<0.022	<0.036	<0.034	--	--	--	--	--	--	--
Benzo(b)Fluoranthene	0.2	0.02	<0.02	<0.02	<u>0.025</u>	<0.02	<0.022	<0.11	<0.10	--	--	--	--	--	--	--
Benzo(k)Fluoranthene	NSE	NSE	<0.07	<0.07	<0.07	<0.07	<0.078	<0.054	<0.052	--	--	--	--	--	--	--
Benzo(g,h,i)Perylene	NSE	NSE	<0.06	0.230	0.17	<0.06	0.078	<0.13	<0.13	--	--	--	--	--	--	--
Chrysene	0.2	0.02	<0.02	<0.02	<0.02	<0.02	<0.022	<0.046	<0.044	--	--	--	--	--	--	--
Dibenzo(a,h)Anthracene	NSE	NSE	<0.11	<0.11	<0.11	<0.11	<0.122	<0.14	<0.14	--	--	--	--	--	--	--
Fluoranthene	400	80	<0.12	<0.12	<0.12	<0.12	<0.133	<0.090	<0.086	--	--	--	--	--	--	--
Fluorene	400	80	<0.12	<0.12	<0.12	<0.12	<0.133	<0.069	<0.066	--	--	--	--	--	--	--
Indeno(1,2,3-cd)Pyrene	NSE	NSE	<0.12	<0.12	<0.12	<0.12	<0.133	<0.069	<0.066	--	--	--	--	--	--	--
1-Methyl Naphthalene	NSE	NSE	<0.08	<0.08	<0.08	<0.08	<0.089	<0.36	<0.34	--	--	--	--	--	--	--
2-Methyl Naphthalene	NSE	NSE	<0.11	<0.11	<0.11	<0.11	0.122	<0.34	<0.33	--	--	--	--	--	--	--
Naphthalene	40	8.0	<0.11	<0.11	<0.11	<0.11	<0.122	<0.44	<0.43	--	--	--	--	--	--	--
Phenanthrene	NSE	NSE	<0.11	<0.11	<0.11	<0.11	<0.122	<0.033	<0.032	--	--	--	--	--	--	--
Pyrene	250	50	<0.1	<0.1	<0.1	<0.1	<0.111	<0.049	<0.047	--	--	--	--	--	--	--
VOCS² (µg/l)																
Benzene	5.0	0.5	<0.15	<0.15	<0.15	<0.15	<0.15	<0.20	<0.20	--	--	--	<0.20	--	<0.074	--
Bromobenzene	NSE	NSE	<0.1	<0.1	<0.1	<0.1	<0.1	<0.20	<0.20	--	--	--	<0.20	--	<0.25	--
Bromochloromethane	NSE	NSE	--	<0.1	<0.1	<0.1	<0.1	<0.50	<0.50	--	--	--	<0.50	--	<0.40	--
Bromodichloromethane	0.6	0.06	<0.1	<0.1	<0.1	<0.1	<0.1	<0.20	<0.20	--	--	--	<0.20	--	<0.17	--
Bromomethane	10	1.0	--	<0.15	<0.15	<0.15	<0.15	<0.20	<0.20	--	--	--	<0.50	--	<0.31	--
n-Butylbenzene	NSE	NSE	<0.2	<0.2	<0.2	<0.2	<0.2	<0.20	<0.20	--	--	--	<0.20	--	<0.13	--
sec-Butylbenzene	NSE	NSE	<0.15	<0.15	<0.15	<0.15	<0.15	<0.25	<0.25	--	--	--	<0.25	--	<0.15	--
tert-Butylbenzene	NSE	NSE	<0.15	<0.15	<0.15	<0.15	<0.15	<0.20	<0.20	--	--	--	<0.20	--	<0.14	--
Carbon Tetrachloride	5.0	0.5	<0.2	<0.2	<0.2	<0.2	<0.2	<0.50	<0.50	--	--	--	<0.80	--	<0.26	--
Chlorobenzene	NSE	NSE	<0.1	<0.1	<0.1	<0.1	<0.1	<0.20	<0.20	--	--	--	<0.20	--	<0.14	--
Chlorodibromomethane	NSE	NSE	<0.1	<0.1	<0.1	<0.1	<0.1	<0.20	<0.20	--	--	--	<0.20	--	<0.32	--
Chloroethane	400	80	<0.6	<0.6	<0.6	<0.6	<0.6	<1.0	<1.0	--	--	--	<1.0	--	<0.34	--
Chloroform	6.0	0.6	<0.1	<0.1	<0.1	<0.1	<0.1	<0.20	<0.20	--	--	--	<0.20	--	<0.20	--
Chloromethane	3.0	0.3	<0.2	<0.2	<0.2	<0.2	<0.2	<0.20	<0.20	--	--	--	<.30	--	<0.18	--
o-Chlorotoluene	NSE	NSE	<0.1	<0.1	<0.1	<0.1	<0.1	<0.50	<0.50	--	--	--	<0.50	--	<0.21	--
p-Chlorotoluene	NSE	NSE	<0.2	<0.2	<0.2	<0.2	<0.2	<0.20	<0.20	--	--	--	<0.20	--	<0.20	--
1,2-Dibromo-3-chloropropane	0.2	0.02	<0.3	<0.35	<0.35	<0.35	<0.35	<0.50	<0.50	--	--	--	<0.50	--	<0.87	--
1,2-Dibromoethane	0.05	0.005	<0.1	<0.1	<0.1	<0.1	<0.1	<0.20	<0.20	--	--	--	<0.20	--	<0.36	--

SOURCE:
SEH, 2019. Comprehensive Site Investigation Report
NOTE: WDNR Regulatory criteria is not current.

**Table 1
Groundwater Analytical Results**

Analytical Parameters	NR 140 Standards		Well No./Sampling Date													
	ES	PAL	MW-5													
			2/16/06	5/30/06	5/30/06 Dup	8/29/06	11/15/06	2/19/08	5/21/08	3/19/09	3/19/09 Dup	7/8/09	10/5/11	11/4/11	2/28/13	3/1/13
VOCs² (µg/l)																
1,2-Dichlorobenzene	600	60	<0.75	<0.75	<0.75	<0.75	<0.75	<0.20	<0.20	--	--	--	<0.20	--	<0.27	--
1,3-Dichlorobenzene	1,250	125	<0.15	<0.15	<0.15	<0.15	<0.15	<0.20	<0.20	--	--	--	<0.20	--	<0.15	--
1,4-Dichlorobenzene	75	15	<0.75	<0.75	<0.75	<0.75	<0.75	<0.20	<0.20	--	--	--	<0.50	--	<0.15	--
Dichlorodifluoromethane	1,000	200	<0.25	<0.25	<0.25	<0.25	<0.25	<0.50	<0.50	--	--	--	<0.50	--	<0.20	--
1,1-Dichloroethane	850	85	<0.15	<0.15	<0.15	<0.15	<0.15	<0.50	<0.50	--	--	--	<0.50	--	<0.19	--
1,2-Dichloroethane	5.0	0.5	0.357	0.29	0.24	0.35	0.34	<0.50	<0.50	--	--	--	<0.50	--	<0.28	--
1,1-Dichloroethylene	7.0	0.7	<0.15	<0.15	<0.15	<0.15	<0.15	<0.50	<0.50	--	--	--	<0.50	--	<0.31	--
cis-1,2-Dichloroethylene	70	7.0	<u>8.26</u>	5.98	5.49	<u>7.34</u>	<u>9.97</u>	6.5	<u>8.6</u>	0.45	0.50	<u>8.40</u>	3.60	4.7	4.7	--
trans-1,2-Dichloroethylene	100	20	0.262	0.46	0.48	0.2	0.53	<0.50	<0.50	--	--	--	<0.50	--	<0.25	--
1,2-Dichloropropane	5.0	0.5	<0.1	<0.1	<0.1	<0.1	<0.1	<0.50	<0.50	--	--	--	<0.50	--	<0.20	--
1,3-Dichloropropane	NSE	NSE	<0.1	<0.1	<0.1	<0.1	<0.1	<0.25	<0.25	--	--	--	<0.25	--	<0.13	--
2,2-Dichloropropane	NSE	NSE	<0.1	<0.1	<0.1	<0.1	0.12	<0.50	<0.50	--	--	--	<0.50	--	<0.32	--
1,1-Dichloropropene	NSE	NSE	<0.2	<0.3	<0.3	<0.3	0.34	<0.50	<0.50	--	--	--	<0.50	--	<0.34	--
cis-1,3-Dichloropropene	0.2	0.02	<0.1	<0.1	<0.1	<0.1	<0.1	<0.20	<0.20	--	--	--	<0.20	--	<0.18	--
trans-1,3-Dichloropropene	0.2	0.02	<0.1	<0.1	<0.1	<0.1	<0.1	<0.20	<0.20	--	--	--	<0.20	--	<0.21	--
Ethylbenzene	700	140	<0.1	<0.1	0.11	<0.1	<0.1	<0.50	<0.50	--	--	--	<0.50	--	<0.13	--
Hexachlorobutadiene	NSE	NSE	<1.00	<1.00	<1.00	<1.00	<1.00	<0.50	<0.50	--	--	--	<0.50	--	<0.26	--
Isopropylbenzene	NSE	NSE	<0.1	<0.1	<0.1	<0.1	<0.1	<0.20	<0.20	--	--	--	<0.20	--	<0.14	--
Isopropyl Ether	NSE	NSE	--	--	--	--	--	<0.50	<0.50	--	--	--	<0.50	--	<0.15	--
p-Isopropyltoluene	NSE	NSE	<0.2	<0.2	<0.2	<0.2	<0.2	<0.20	<0.20	--	--	--	<0.20	--	<0.17	--
Methyl tert Butyl Ether	60	12	<0.1	0.17	0.18	<0.10	0.18	<0.50	<0.50	--	--	--	<0.50	--	<0.24	--
Methylene Chloride	5.0	0.5	<0.4	<0.4	<0.4	<0.4	<0.4	<1.0	<1.0	--	--	--	<1.0	--	<0.68	--
Naphthalene	40	8.0	<1.00	<1.00	<1.00	<1.00	<1.00	<0.25	<0.25	--	--	--	<0.25	--	<0.16	--
n-Propylbenzene	NSE	NSE	<0.1	<0.1	<0.1	<0.1	<0.1	<0.50	<0.50	--	--	--	<0.50	--	<0.13	--
Tetrachloroethylene	5.0	0.5	<0.1	<0.1	<0.1	<0.1	<0.1	<0.50	<0.50	--	--	--	<0.50	--	<0.17	--
1,1,1,2-Tetrachloroethane	70	7.0	<0.1	<0.1	<0.1	<0.1	<0.1	<0.25	<0.25	--	--	--	<0.25	--	<0.25	--
1,1,2,2-Tetrachloroethane	0.2	0.02	<0.1	<0.1	<0.1	<0.1	<0.1	<0.20	<0.20	--	--	--	<0.20	--	<0.23	--
Toluene	1,000	200	<0.4	<0.4	<0.4	<0.4	<0.4	0.33	<0.20	--	--	--	<0.50	--	<0.11	--
1,1,2-Trichloroethane	5.0	0.5	--	<0.1	<0.1	<0.1	<0.1	<0.25	<0.25	--	--	--	<0.25	--	<0.28	--
Total Trimethylbenzenes	480	96	<0.3	<0.3	<0.3	<0.3	<0.3	<0.40	<0.40	--	--	--	--	--	<0.18	--
1,2,3-Trichlorobenzene	NSE	NSE	<0.5	<0.5	<0.5	<0.5	<0.5	<0.25	<0.25	--	--	--	<0.25	--	<0.24	--
1,2,4-Trichlorobenzene	70	14	<0.5	<0.5	<0.5	<0.5	<0.5	<0.25	<0.25	--	--	--	<0.25	--	<0.31	--
1,1,1-Trichloroethane	200	40	<0.2	<0.2	<0.2	<0.2	<0.2	<0.50	<0.50	--	--	--	<0.50	--	<0.20	--
Trichloroethylene	5.0	0.5	<0.2	<0.2	<0.2	<0.2	<0.2	<0.20	<0.20	--	--	--	<0.20	--	<0.19	--
Trichlorofluoromethane	NSE	NSE	<0.2	<0.2	<0.2	<0.2	<0.2	<0.50	<0.50	--	--	--	<0.50	--	<0.19	--
Vinyl Chloride	0.2	0.02	<0.15	<0.15	<0.15	<0.15	<0.15	<0.20	<0.20	<0.016	<0.016	--	<0.20	--	<0.10	--
Total Xylenes	10,000	1,000	<0.5	<0.5	<0.5	<0.5	<0.5	<0.50	<0.50	--	--	--	<0.50	--	<0.068	--
Metals (µg/l)																
Arsenic	50	5.0	0.6	--	--	--	--	--	--	--	--	--	--	--	--	--
Barium	2,000	400	68.5	--	--	--	--	--	--	--	--	--	--	--	--	--
Cadmium	5.0	0.5	<0.2	--	--	--	--	--	--	--	--	--	--	--	--	--
Chromium	100	10	1.90	--	--	--	--	--	--	--	--	--	--	--	--	--
Lead	15	1.5	<0.3	--	--	--	--	--	--	--	--	--	--	--	--	--
Mercury	2.0	0.2	<0.07	--	--	--	--	--	--	--	--	--	--	--	--	--
Selenium	50	10	0.7	--	--	--	--	--	--	--	--	--	--	--	--	--
Silver	50	10	<0.2	--	--	--	--	--	--	--	--	--	--	--	--	--

SOURCE:
SEH, 2019. Comprehensive Site Investigation Report
NOTE: WDNR Regulatory criteria is not current.

**Table 1
Groundwater Analytical Results**

Analytical Parameters	NR 140 Standards		Well No./Sampling Date											
	ES	PAL	PZ-5											
			2/16/06	5/30/06	8/29/06	11/15/06	2/19/08	5/21/08	3/19/09	7/8/09	10/6/11	11/4/11	2/28/13	3/1/13
Elevation Data														
Top of PVC	--	--	848.36	848.36	848.36	848.36	848.36	848.36	848.36	848.36	848.36	848.36	848.36	848.36
Top of Screen	--	--	823.14	823.14	823.14	823.14	823.14	823.14	823.14	823.14	823.14	823.14	823.14	823.14
Bottom of Screen	--	--	818.14	818.14	818.14	818.14	818.14	818.14	818.14	818.14	818.14	818.14	818.14	818.14
Groundwater	--	--	--	843.74	842.57	842.85	843.09	843.26	844.65	842.64	842.71	843.21	843.27	--
pH	NSE	NSE	7.48	--	--	--	--	--	--	--	--	--	--	--
DRO (µg/l)	NSE	NSE	--	--	--	--	--	--	--	--	--	--	--	--
PAHs¹ (µg/l)														
Acenaphthene	NSE	NSE	<0.06	<0.06	<0.06	<0.067	--	--	--	--	--	--	--	--
Acenaphthylene	NSE	NSE	<0.06	<0.06	<0.06	<0.067	--	--	--	--	--	--	--	--
Anthracene	3,000	600	<0.09	<0.09	<0.09	<0.1	--	--	--	--	--	--	--	--
Benzo(a)Anthracene	NSE	NSE	<0.1	<0.1	<0.1	<0.111	--	--	--	--	--	--	--	--
Benzo(a)Pyrene	0.2	0.02	<0.02	<0.02	<0.02	<0.022	--	--	--	--	--	--	--	--
Benzo(b)Fluoranthene	0.2	0.02	<0.02	<0.02	<0.02	<0.022	--	--	--	--	--	--	--	--
Benzo(k)Fluoranthene	NSE	NSE	<0.07	<0.07	<0.07	<0.078	--	--	--	--	--	--	--	--
Benzo(g,h,i)Perylene	NSE	NSE	<0.06	<0.06	<0.06	<0.067	--	--	--	--	--	--	--	--
Chrysene	0.2	0.02	<0.02	<0.02	<0.02	<0.022	--	--	--	--	--	--	--	--
Dibenzo(a,h)Anthracene	NSE	NSE	<0.11	<0.11	<0.11	<0.122	--	--	--	--	--	--	--	--
Fluoranthene	400	80	0.123	<0.12	<0.12	<0.133	--	--	--	--	--	--	--	--
Fluorene	400	80	<0.12	<0.12	<0.12	<0.133	--	--	--	--	--	--	--	--
Indeno(1,2,3-cd)Pyrene	NSE	NSE	<0.12	<0.12	<0.12	<0.133	--	--	--	--	--	--	--	--
1-Methyl Naphthalene	NSE	NSE	<0.08	<0.08	<0.08	<0.089	--	--	--	--	--	--	--	--
2-Methyl Naphthalene	NSE	NSE	<0.11	<0.11	<0.11	<0.122	--	--	--	--	--	--	--	--
Naphthalene	40	8.0	<0.11	<0.11	<0.11	<0.122	--	--	--	--	--	--	--	--
Phenanthrene	NSE	NSE	<0.11	<0.11	<0.11	<0.122	--	--	--	--	--	--	--	--
Pyrene	250	50	0.169	<0.1	<0.1	<0.111	--	--	--	--	--	--	--	--
VOCs² (µg/l)														
Benzene	5.0	0.5	<0.15	<0.15	<0.15	<0.15	--	--	--	--	<0.20	--	<0.074	--
Bromobenzene	NSE	NSE	<0.1	<0.1	<0.1	<0.1	--	--	--	--	<0.20	--	<0.25	--
Bromochloromethane	NSE	NSE	--	<0.1	<0.1	<0.1	--	--	--	--	<0.50	--	<0.40	--
Bromodichloromethane	0.6	0.06	<0.1	<0.1	<0.1	<0.1	--	--	--	--	<0.20	--	<0.17	--
Bromomethane	10	1.0	--	<0.15	<0.15	<0.15	--	--	--	--	<0.50	--	<0.31	--
n-Butylbenzene	NSE	NSE	<0.2	<0.2	<0.2	<0.2	--	--	--	--	<0.20	--	<0.13	--
sec-Butylbenzene	NSE	NSE	<0.15	<0.15	<0.15	<0.15	--	--	--	--	<0.25	--	<0.15	--
tert-Butylbenzene	NSE	NSE	<0.15	<0.15	<0.15	<0.15	--	--	--	--	<0.20	--	<0.14	--
Carbon Tetrachloride	5.0	0.5	<0.2	<0.2	<0.2	<0.2	--	--	--	--	<0.80	--	<0.26	--
Chlorobenzene	NSE	NSE	<0.1	<0.1	<0.1	<0.1	--	--	--	--	<0.20	--	<0.14	--
Chlorodibromomethane	NSE	NSE	<0.1	<0.1	<0.1	<0.1	--	--	--	--	<0.20	--	<0.32	--
Chloroethane	400	80	<0.6	<0.6	<0.6	<0.6	--	--	--	--	<1.0	--	<0.34	--
Chloroform	6.0	0.6	<0.1	<0.1	<0.1	<0.1	--	--	--	--	<0.20	--	<0.20	--
Chloromethane	3.0	0.3	<0.2	<0.2	<0.2	<0.2	--	--	--	--	<0.30	--	<0.18	--
o-Chlorotoluene	NSE	NSE	<0.1	<0.1	<0.1	<0.1	--	--	--	--	<0.50	--	<0.21	--
p-Chlorotoluene	NSE	NSE	<0.2	<0.2	<0.2	<0.2	--	--	--	--	<0.20	--	<0.20	--
1,2-Dibromo-3-chloropropane	0.2	0.02	<0.3	<0.35	<0.35	<0.35	--	--	--	--	<0.50	--	<0.87	--
1,2-Dibromoethane	0.05	0.005	<0.1	<0.1	<0.1	<0.1	--	--	--	--	<0.20	--	<0.36	--

SOURCE:
SEH, 2019. Comprehensive Site Investigation Report
NOTE: WDNR Regulatory criteria is not current.

**Table 1
Groundwater Analytical Results**

Analytical Parameters	NR 140 Standards		Well No./Sampling Date												
	ES	PAL	PZ-5												
			2/16/06	5/30/06	8/29/06	11/15/06	2/19/08	5/21/08	3/19/09	7/8/09	10/6/11	11/4/11	2/28/13	3/1/13	
VOCs² (µg/l)															
1,2-Dichlorobenzene	600	60	<0.75	<0.75	<0.75	<0.75	--	--	--	--	<0.20	--	<0.27	--	
1,3-Dichlorobenzene	1,250	125	<0.15	<0.15	<0.15	<0.15	--	--	--	--	<0.20	--	<0.15	--	
1,4-Dichlorobenzene	75	15	<0.75	<0.75	<0.75	<0.75	--	--	--	--	<0.50	--	<0.15	--	
Dichlorodifluoromethane	1,000	200	<0.25	<0.25	<0.25	<0.25	--	--	--	--	<0.50	--	<0.20	--	
1,1-Dichloroethane	850	85	<0.15	<0.15	<0.15	<0.15	--	--	--	--	<0.50	--	<0.19	--	
1,2-Dichloroethane	5.0	0.5	0.335	0.31	0.38	0.48	--	--	--	--	6.3	5.2	5.2	--	
1,1-Dichloroethylene	7.0	0.7	<0.15	<0.15	<0.15	<0.15	--	--	--	--	<0.50	--	<0.31	--	
cis-1,2-Dichloroethylene	70	7.0	<0.2	0.21	<0.20	0.26	--	--	--	--	0.8	1.3	1.3	--	
trans-1,2-Dichloroethylene	100	20	<0.1	<0.1	<0.1	<0.1	--	--	--	--	<0.50	--	<0.25	--	
1,2-Dichloropropane	5.0	0.5	<0.1	<0.1	<0.1	<0.1	--	--	--	--	<0.50	--	<0.20	--	
1,3-Dichloropropane	NSE	NSE	<0.1	<0.1	<0.1	<0.1	--	--	--	--	<0.25	--	<0.13	--	
2,2-Dichloropropane	NSE	NSE	<0.1	<0.1	<0.1	<0.1	--	--	--	--	<0.50	--	<0.32	--	
1,1-Dichloropropene	NSE	NSE	<0.2	<0.3	<0.3	<0.3	--	--	--	--	<0.50	--	<0.34	--	
cis-1,3-Dichloropropene	0.2	0.02	<0.1	<0.1	<0.1	<0.1	--	--	--	--	<0.20	--	<0.18	--	
trans-1,3-Dichloropropene	0.2	0.02	<0.1	<0.1	<0.1	<0.1	--	--	--	--	<0.20	--	<0.21	--	
Ethylbenzene	700	140	<0.1	<0.1	<0.1	<0.1	--	--	--	--	<0.50	--	<0.13	--	
Hexachlorobutadiene	NSE	NSE	<1.00	<1.00	<1.00	<1.00	--	--	--	--	<0.50	--	<0.26	--	
Isopropylbenzene	NSE	NSE	<0.1	<0.1	<0.1	<0.1	--	--	--	--	<0.20	--	<0.14	--	
Isopropyl Ether	NSE	NSE	--	--	--	--	--	--	--	--	<0.50	--	<0.15	--	
p-Isopropyltoluene	NSE	NSE	<0.2	<0.2	<0.2	<0.2	--	--	--	--	<0.20	--	<0.17	--	
Methyl tert Butyl Ether	60	12	<0.1	0.14	<0.1	0.12	--	--	--	--	<0.50	--	<0.24	--	
Methylene Chloride	5.0	0.5	<0.4	<0.4	<0.4	<0.4	--	--	--	--	<1.0	--	<0.68	--	
Naphthalene	40	8.0	<1.00	<1.00	<1.00	<1.00	--	--	--	--	<0.25	--	<0.16	--	
n-Propylbenzene	NSE	NSE	<0.1	<0.1	<0.1	<0.1	--	--	--	--	<0.50	--	<0.13	--	
Tetrachloroethylene	5.0	0.5	<0.1	<0.1	<0.1	<0.1	--	--	--	--	<0.50	--	<0.17	--	
1,1,1,2-Tetrachloroethane	70	7.0	<0.1	<0.1	<0.1	<0.1	--	--	--	--	<0.25	--	<0.25	--	
1,1,1,2,2-Tetrachloroethane	0.2	0.02	<0.1	<0.1	<0.1	<0.1	--	--	--	--	<0.20	--	<0.23	--	
Toluene	1,000	200	<0.4	<0.4	<0.4	<0.4	--	--	--	--	<0.50	--	<0.11	--	
1,1,2-Trichloroethane	5.0	0.5	--	<0.1	<0.1	<0.1	--	--	--	--	<0.25	--	<0.28	--	
Total Trimethylbenzenes	480	96	<0.3	<0.3	<0.3	<0.3	--	--	--	--	--	--	<0.18	--	
1,2,3-Trichlorobenzene	NSE	NSE	<0.5	<0.5	<0.5	<0.5	--	--	--	--	<0.25	--	<0.24	--	
1,2,4-Trichlorobenzene	70	14	<0.5	<0.5	<0.5	<0.5	--	--	--	--	<0.25	--	<0.31	--	
1,1,1-Trichloroethane	200	40	<0.2	<0.2	<0.2	<0.2	--	--	--	--	<0.50	--	<0.20	--	
Trichloroethylene	5.0	0.5	<0.2	<0.2	<0.2	<0.2	--	--	--	--	0.28	<u>0.57</u>	<u>0.57</u>	--	
Trichlorofluoromethane	NSE	NSE	<0.2	<0.2	<0.2	<0.2	--	--	--	--	<0.50	--	<0.19	--	
Vinyl Chloride	0.2	0.02	<0.15	<0.15	<0.15	<0.15	--	--	<0.016	--	<0.20	--	<0.10	--	
Total Xylenes	10,000	1,000	<0.5	<0.5	<0.5	<0.5	--	--	--	--	<0.50	--	<0.068	--	
Metals (µg/l)															
Arsenic	50	5.0	<u>10.3</u>	--	--	2.02	<u>17</u>	<u>24</u>	<u>20</u>	<u>21</u>	--	--	--	--	
Barium	2,000	400	71.2	--	--	--	--	--	--	--	--	--	--	--	
Cadmium	5.0	0.5	<0.2	--	--	--	--	--	--	--	--	--	--	--	
Chromium	100	10	<1.60	--	--	--	--	--	--	--	--	--	--	--	
Lead	15	1.5	<0.3	--	--	--	--	--	--	--	--	--	--	--	
Mercury	2.0	0.2	<0.07	--	--	--	--	--	--	--	--	--	--	--	
Selenium	50	10	0.8	--	--	--	--	--	--	--	--	--	--	--	
Silver	50	10	<0.2	--	--	--	--	--	--	--	--	--	--	--	

SOURCE:
SEH, 2019. Comprehensive Site Investigation Report
NOTE: WDNR Regulatory criteria is not current.

**Table 1
Groundwater Analytical Results**

Analytical Parameters	NR 140 Standards		Well No./Sampling Date																					
			MW-6										MW-7											
	ES	PAL	2/16/06	5/30/06	8/29/06	11/15/06	2/19/08	5/21/08	3/19/09	7/8/09	2/28/13	3/1/13	2/16/06	5/30/06	8/29/06	11/15/06	2/19/08	5/21/08	3/19/09	7/8/09	10/5/11	11/4/11	2/28/13	3/1/13
Elevation Data																								
Top of PVC	--	--	846.36	846.36	846.36	846.36	846.36	846.36	846.36	846.36	846.36	846.36	846.53	846.53	846.53	846.53	846.53	846.53	846.53	846.53	846.53	846.53	846.53	846.53
Top of Screen	--	--	844.28	844.28	844.28	844.28	844.28	844.28	844.28	844.28	844.28	844.28	845.17	845.17	845.17	845.17	845.17	845.17	845.17	845.17	845.17	845.17	845.17	845.17
Bottom of Screen	--	--	834.28	834.28	834.28	834.28	834.28	834.28	834.28	834.28	834.28	834.28	835.17	835.17	835.17	835.17	835.17	835.17	835.17	835.17	835.17	835.17	835.17	835.17
Groundwater	--	--	843.00	843.48	842.55	842.84	842.96	842.98	--	842.45	--	--	842.94	843.27	842.58	842.86	842.98	843.03	--	842.41	842.62	841.89	--	--
pH	NSE	NSE	7.39	--	--	--	--	--	--	--	--	--	7.49	--	--	--	--	--	--	--	--	--	--	--
DRO (µg/l)	NSE	NSE	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
PAHs¹ (µg/l)																								
Acenaphthene	NSE	NSE	<0.06	<0.06	<0.06	<0.067	--	--	--	--	--	--	<0.06	<0.061	<0.061	<0.067	--	--	--	--	--	--	--	--
Acenaphthylene	NSE	NSE	<0.06	<0.06	<0.06	<0.067	--	--	--	--	--	--	<0.06	<0.061	<0.061	<0.067	--	--	--	--	--	--	--	--
Anthracene	3,000	600	<0.09	<0.09	<0.09	<0.1	--	--	--	--	--	--	<0.09	<0.092	<0.092	<0.1	--	--	--	--	--	--	--	--
Benzo(a)Anthracene	NSE	NSE	<0.1	<0.1	<0.1	<0.111	--	--	--	--	--	--	<0.1	<0.102	<0.102	<0.111	--	--	--	--	--	--	--	--
Benzo(a)Pyrene	0.2	0.02	<0.02	<0.02	<0.02	<0.022	--	--	--	--	--	--	<0.02	<0.02	<0.02	<0.022	--	--	--	--	--	--	--	--
Benzo(b)Fluoranthene	0.2	0.02	<0.02	<0.02	<0.02	<0.022	--	--	--	--	--	--	<0.02	<0.02	<0.02	<0.022	--	--	--	--	--	--	--	--
Benzo(k)Fluoranthene	NSE	NSE	<0.07	<0.07	<0.07	<0.078	--	--	--	--	--	--	<0.07	<0.071	<0.071	<0.078	--	--	--	--	--	--	--	--
Benzo(g,h,i)Perylene	NSE	NSE	<0.06	<0.06	<0.06	0.092	--	--	--	--	--	--	<0.06	<0.061	<0.061	<0.067	--	--	--	--	--	--	--	--
Chrysene	0.2	0.02	<0.02	<0.02	<0.02	<0.022	--	--	--	--	--	--	<0.02	<0.020	<0.020	<0.022	--	--	--	--	--	--	--	--
Dibenzo(a,h)Anthracene	NSE	NSE	<0.11	<0.11	<0.11	<0.122	--	--	--	--	--	--	<0.11	<0.112	<0.112	<0.122	--	--	--	--	--	--	--	--
Fluoranthene	400	80	<0.12	<0.12	<0.12	<0.133	--	--	--	--	--	--	<0.12	<0.122	<0.122	<0.133	--	--	--	--	--	--	--	--
Fluorene	400	80	<0.12	<0.12	<0.12	<0.133	--	--	--	--	--	--	<0.12	<0.122	<0.122	<0.133	--	--	--	--	--	--	--	--
Indeno(1,2,3-cd)Pyrene	NSE	NSE	<0.12	<0.12	<0.12	<0.133	--	--	--	--	--	--	<0.12	<0.122	<0.122	<0.133	--	--	--	--	--	--	--	--
1-Methyl Naphthalene	NSE	NSE	<0.08	<0.08	<0.08	<0.089	--	--	--	--	--	--	<0.08	<0.082	<0.082	<0.089	--	--	--	--	--	--	--	--
2-Methyl Naphthalene	NSE	NSE	<0.11	<0.11	<0.11	<0.122	--	--	--	--	--	--	<0.11	<0.112	<0.112	<0.122	--	--	--	--	--	--	--	--
Naphthalene	40	8.0	<0.11	<0.11	<0.11	<0.122	--	--	--	--	--	--	<0.11	<0.112	<0.112	<0.122	--	--	--	--	--	--	--	--
Phenanthrene	NSE	NSE	<0.11	<0.11	<0.11	<0.122	--	--	--	--	--	--	<0.11	<0.112	<0.112	<0.122	--	--	--	--	--	--	--	--
Pyrene	250	50	<0.1	<0.1	<0.1	<0.111	--	--	--	--	--	--	<0.1	<0.102	<0.102	<0.111	--	--	--	--	--	--	--	--
VOCs² (µg/l)																								
Benzene	5.0	0.5	<0.15	<0.15	<0.15	<0.15	<0.20	<0.20	--	--	--	--	<0.15	<0.15	<0.15	<0.15	<0.20	<0.20	--	--	<0.20	--	--	--
Bromobenzene	NSE	NSE	<0.1	<0.1	<0.1	<0.1	<0.20	<0.20	--	--	--	--	<0.1	<0.1	<0.1	<0.1	<0.20	<0.20	--	--	<0.20	--	--	--
Bromochloromethane	NSE	NSE	--	<0.1	<0.1	<0.1	<0.50	<0.50	--	--	--	--	--	<0.1	<0.1	<0.1	<0.50	<0.50	--	--	<0.50	--	--	--
Bromodichloromethane	0.6	0.06	<0.1	<0.1	<0.1	<0.1	<0.20	<0.20	--	--	--	--	<0.1	<0.1	<0.1	<0.1	<0.20	<0.20	--	--	<0.20	--	--	--
Bromomethane	10	1.0	--	<0.15	<0.15	<0.15	<0.20	<0.20	--	--	--	--	--	<0.15	<0.15	<0.15	<0.20	<0.20	--	--	<0.50	--	--	--
n-Butylbenzene	NSE	NSE	<0.2	<0.2	<0.2	<0.2	<0.20	<0.20	--	--	--	--	<0.2	<0.2	<0.2	<0.2	<0.20	<0.20	--	--	<0.20	--	--	--
sec-Butylbenzene	NSE	NSE	<0.15	<0.15	<0.15	<0.15	<0.25	<0.25	--	--	--	--	<0.15	<0.15	<0.15	<0.15	<0.25	<0.25	--	--	<0.25	--	--	--
tert-Butylbenzene	NSE	NSE	<0.15	<0.15	<0.15	<0.15	<0.20	<0.20	--	--	--	--	<0.15	<0.15	<0.15	<0.15	<0.20	<0.20	--	--	<0.20	--	--	--
Carbon Tetrachloride	5.0	0.5	<0.2	<0.2	<0.2	<0.2	<0.50	<0.50	--	--	--	--	<0.2	<0.2	<0.2	<0.2	<0.50	<0.50	--	--	<0.80	--	--	--
Chlorobenzene	NSE	NSE	<0.1	<0.1	<0.1	<0.1	<0.20	<0.20	--	--	--	--	<0.1	<0.1	<0.1	<0.1	<0.20	<0.20	--	--	<0.20	--	--	--
Chlorodibromomethane	NSE	NSE	<0.1	<0.1	<0.1	<0.1	<0.20	<0.20	--	--	--	--	<0.1	<0.1	<0.1	<0.1	<0.20	<0.20	--	--	<0.20	--	--	--
Chloroethane	400	80	<0.6	<0.6	<0.6	<0.6	<1.0	<1.0	--	--	--	--	<0.6	<0.6	<0.6	<0.6	<1.0	<1.0	--	--	<1.0	--	--	--
Chloroform	6.0	0.6	<0.1	<0.1	<0.1	<0.1	<0.20	<0.20	--	--	--	--	<0.1	<0.1	<0.1	<0.1	<0.20	<0.20	--	--	<0.20	--	--	--
Chloromethane	3.0	0.3	<0.2	0.24	<0.2	<0.2	<0.20	<0.20	--	--	--	--	<0.2	<0.2	<0.2	<0.2	<0.20	<0.20	--	--	<.30	--	--	--
o-Chlorotoluene	NSE	NSE	<0.1	<0.1	<0.1	<0.1	<0.50	<0.50	--	--	--	--	<0.1	<0.1	<0.1	<0.1	<0.50	<0.50	--	--	<0.50	--	--	--
p-Chlorotoluene	NSE	NSE	<0.2	<0.2	<0.2	<0.2	<0.20	<0.20	--	--	--	--	<0.2	<0.2	<0.2	<0.2	<0.20	<0.20	--	--	<0.20	--	--	--
1,2-Dibromo-3-chloropropane	0.2	0.02	<0.3	<0.35	<0.35	<0.35	<0.50	<0.50	--	--	--	--	<0.3	<0.35	<0.35	<0.35	<0.50	<0.50	--	--	<0.50	--	--	--
1,2-Dibromoethane	0.05	0.005	<0.1	<0.1	<0.1	<0.1	<0.20	<0.20	--	--	--	--	<0.1	<0.1	<0.1	<0.1	<0.20	<0.20	--	--	<0.20	--	--	--

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SEH, 2019. Comprehensive Site Investigation Report
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**Table 1
Groundwater Analytical Results**

Analytical Parameters	NR 140 Standards		Well No./Sampling Date																						
			MW-6										MW-7												
	ES	PAL	2/16/06	5/30/06	8/29/06	11/15/06	2/19/08	5/21/08	3/19/09	7/8/09	2/28/13	3/1/13	2/16/06	5/30/06	8/29/06	11/15/06	2/19/08	5/21/08	3/19/09	7/8/09	10/5/11	11/4/11	2/28/13	3/1/13	
VOCs² (µg/l)																									
1,2-Dichlorobenzene	600	60	<0.75	<0.75	<0.75	<0.75	<0.20	<0.20	--	--	--	--	<0.75	<0.75	<0.75	<0.75	<0.20	<0.20	--	--	<0.20	--	--	--	
1,3-Dichlorobenzene	1,250	125	<0.15	<0.15	<0.15	<0.15	<0.20	<0.20	--	--	--	--	<0.15	<0.15	<0.15	<0.15	<0.20	<0.20	--	--	<0.20	--	--	--	
1,4-Dichlorobenzene	75	15	<0.75	<0.75	<0.75	<0.75	<0.20	<0.20	--	--	--	--	<0.75	<0.75	<0.75	<0.75	<0.20	<0.20	--	--	<0.50	--	--	--	
Dichlorodifluoromethane	1,000	200	<0.25	<0.25	<0.25	<0.25	<0.50	<0.50	--	--	--	--	<0.25	<0.25	<0.25	<0.25	<0.50	<0.50	--	--	<0.50	--	--	--	
1,1-Dichloroethane	850	85	<0.15	<0.15	<0.15	<0.15	<0.50	<0.50	--	--	--	--	<0.15	<0.15	<0.15	<0.15	<0.50	<0.50	--	--	<0.50	--	--	--	
1,2-Dichloroethane	5.0	0.5	<u>0.678</u>	<u>0.67</u>	<u>0.69</u>	<u>0.64</u>	<0.50	<0.50	--	--	--	--	<u>0.786</u>	<u>0.53</u>	<u>0.77</u>	<u>0.96</u>	<u>0.73</u>	<0.50	0.28	<u>0.79</u>	<u>0.73</u>	--	--	--	
1,1-Dichloroethylene	7.0	0.7	<0.15	<0.15	<0.15	<0.15	<0.50	<0.50	--	--	--	--	<0.15	<0.15	<0.15	<0.15	<0.50	<0.50	--	--	<0.50	--	--	--	
cis-1,2-Dichloroethylene	70	7.0	0.869	0.81	1.36	2.79	2.2	1.2	--	--	--	--	1.82	1.38	3.27	1.86	1.6	1.3	--	--	2	--	--	--	
trans-1,2-Dichloroethylene	100	20	<0.1	<0.1	<0.1	<0.1	<0.50	<0.50	--	--	--	--	<0.1	<0.1	<0.1	<0.1	<0.50	<0.50	--	--	<0.50	--	--	--	
1,2-Dichloropropane	5.0	0.5	<0.1	<0.1	<0.1	<0.1	<0.50	<0.50	--	--	--	--	<0.1	<0.1	<0.1	<0.1	<0.50	<0.50	--	--	<0.50	--	--	--	
1,3-Dichloropropane	NSE	NSE	<0.1	<0.1	<0.1	<0.1	<0.25	<0.25	--	--	--	--	<0.1	<0.1	<0.1	<0.1	<0.25	<0.25	--	--	<0.25	--	--	--	
2,2-Dichloropropane	NSE	NSE	<0.1	<0.1	<0.1	<0.1	<0.50	<0.50	--	--	--	--	<0.1	<0.1	<0.1	<0.1	<0.50	<0.50	--	--	<0.50	--	--	--	
1,1-Dichloropropene	NSE	NSE	<0.2	<0.3	<0.3	<0.3	<0.50	<0.50	--	--	--	--	<0.2	<0.3	<0.3	0.32	<0.50	<0.50	--	--	<0.50	--	--	--	
cis-1,3-Dichloropropene	0.2	0.02	<0.1	<0.1	<0.1	<0.1	<0.20	<0.20	--	--	--	--	<0.1	<0.1	<0.1	<0.1	<0.20	<0.20	--	--	<0.20	--	--	--	
trans-1,3-Dichloropropene	0.2	0.02	<0.1	<0.1	<0.1	<0.1	<0.20	<0.20	--	--	--	--	<0.1	<0.1	<0.1	<0.1	<0.20	<0.20	--	--	<0.20	--	--	--	
Ethylbenzene	700	140	<0.1	<0.1	0.1	<0.1	<0.50	<0.50	--	--	--	--	<0.1	<0.1	<0.1	<0.1	<0.50	<0.50	--	--	<0.50	--	--	--	
Hexachlorobutadiene	NSE	NSE	<1.00	<1.00	<1.00	<1.00	<0.50	<0.50	--	--	--	--	<1.00	<1.00	<1.00	<1.00	<0.50	<0.50	--	--	<0.50	--	--	--	
Isopropylbenzene	NSE	NSE	<0.1	<0.1	<0.1	<0.1	<0.20	<0.20	--	--	--	--	<0.1	<0.1	<0.1	<0.1	<0.20	<0.20	--	--	<0.20	--	--	--	
Isopropyl Ether	NSE	NSE	--	--	--	--	<0.50	<0.50	--	--	--	--	--	--	--	--	<0.50	<0.50	--	--	<0.50	--	--	--	
p-Isopropyltoluene	NSE	NSE	<0.2	<0.2	<0.2	<0.2	<0.20	<0.20	--	--	--	--	<0.2	<0.2	<0.2	<0.2	<0.20	<0.20	--	--	<0.20	--	--	--	
Methyl tert Butyl Ether	60	12	<0.1	0.21	<0.1	0.24	<0.50	<0.50	--	--	--	--	<0.1	0.13	0.13	<0.1	<0.50	<0.50	--	--	<0.50	--	--	--	
Methylene Chloride	5.0	0.5	<0.4	<0.4	<0.4	<0.4	<1.0	<1.0	--	--	--	--	<0.4	<0.4	<0.4	<0.4	<1.0	<1.0	--	--	<1.0	--	--	--	
Naphthalene	40	8.0	<1.00	<1.00	<1.00	<1.00	<0.25	<0.25	--	--	--	--	<1.00	<1.00	<1.00	<1.00	<0.25	<0.25	--	--	<0.25	--	--	--	
n-Propylbenzene	NSE	NSE	<0.1	<0.1	<0.1	<0.1	<0.50	<0.50	--	--	--	--	<0.1	<0.1	<0.1	<0.1	<0.25	<0.25	--	--	<0.50	--	--	--	
Tetrachloroethylene	5.0	0.5	<0.1	<0.1	<0.1	<0.1	<0.50	<0.50	--	--	--	--	<0.1	<0.1	<0.1	<0.1	<0.50	<0.50	--	--	<0.50	--	--	--	
1,1,1,2-Tetrachloroethane	70	7.0	<0.1	<0.1	<0.1	<0.1	<0.25	<0.25	--	--	--	--	<0.1	<0.1	<0.1	<0.1	<0.25	<0.25	--	--	<0.25	--	--	--	
1,1,2,2-Tetrachloroethane	0.2	0.02	<0.1	<0.1	<0.1	<0.1	<0.20	<0.20	--	--	--	--	<0.1	<0.1	<0.1	<0.1	<0.20	<0.20	--	--	<0.20	--	--	--	
Toluene	1,000	200	<0.4	<0.4	<0.4	<0.4	<0.20	<0.20	--	--	--	--	<0.4	<0.4	<0.4	<0.4	<0.20	<0.20	--	--	<0.50	--	--	--	
1,1,2-Trichloroethane	5.0	0.5	--	<0.1	<0.1	<0.1	<0.25	<0.25	--	--	--	--	--	<0.1	<0.1	<0.1	<0.1	<0.25	<0.25	--	--	<0.25	--	--	--
Total Trimethylbenzenes	480	96	<0.3	<0.3	<0.3	<0.3	<0.40	<0.40	--	--	--	--	<0.3	<0.3	<0.3	<0.3	<0.40	<0.40	--	--	--	--	--	--	
1,2,3-Trichlorobenzene	NSE	NSE	<0.5	<0.5	<0.5	<0.5	<0.25	<0.25	--	--	--	--	<0.5	<0.5	<0.5	<0.5	<0.25	<0.25	--	--	<0.25	--	--	--	
1,2,4-Trichlorobenzene	70	14	<0.5	<0.5	<0.5	<0.5	<0.25	<0.25	--	--	--	--	<0.5	<0.5	<0.5	<0.5	<0.25	<0.25	--	--	<0.25	--	--	--	
1,1,1-Trichloroethane	200	40	<0.2	<0.2	<0.2	<0.2	<0.50	<0.50	--	--	--	--	<0.2	<0.2	<0.2	<0.2	<0.50	<0.50	--	--	<0.50	--	--	--	
Trichloroethylene	5.0	0.5	<0.2	<0.2	<0.2	<0.2	<0.20	<0.20	--	--	--	--	<0.2	<0.2	<0.2	<0.2	<0.20	<0.20	--	--	<0.20	--	--	--	
Trichlorofluoromethane	NSE	NSE	<0.2	<0.2	<0.2	<0.2	<0.50	<0.50	--	--	--	--	<0.2	<0.2	<0.2	<0.2	<0.50	<0.50	--	--	<0.50	--	--	--	
Vinyl Chloride	0.2	0.02	<0.15	<0.15	<0.15	<0.15	<0.20	<0.20	--	--	--	--	<0.15	<0.15	<0.15	<0.15	<0.20	<0.20	<0.016	--	<0.20	--	--	--	
Total Xylenes	10,000	1,000	<0.5	<0.5	<0.5	<0.5	<0.50	<0.50	--	--	--	--	<0.5	<0.5	<0.5	<0.5	<0.50	<0.50	--	--	<0.50	--	--	--	
Metals (µg/l)																									
Arsenic	50	5.0	1.20	--	--	--	--	--	--	--	--	--	4.70	--	--	--	--	--	--	--	--	--	--	--	
Barium	2,000	400	52.4	--	--	--	--	--	--	--	--	--	58.5	--	--	--	--	--	--	--	--	--	--	--	
Cadmium	5.0	0.5	0.28	--	--	--	--	--	--	--	--	--	<0.2	--	--	--	--	--	--	--	--	--	--	--	
Chromium	100	10	1.90	--	--	--	--	--	--	--	--	--	<1.60	--	--	--	--	--	--	--	--	--	--	--	
Lead	15	1.5	<0.3	--	--	--	--	--	--	--	--	--	<0.3	--	--	--	--	--	--	--	--	--	--	--	
Mercury	2.0	0.2	<0.07	--	--	--	--	--	--	--	--	--	<0.07	--	--	--	--	--	--	--	--	--	--	--	
Selenium	50	10	0.8	--	--	--	--	--	--	--	--	--	0.9	--	--	--	--	--	--	--	--	--	--	--	
Silver	50	10	<0.2	--	--	--	--	--	--	--	--	--	<0.2	--	--	--	--	--	--	--	--	--	--	--	

SOURCE:
SEH, 2019. Comprehensive Site Investigation Report
NOTE: WDNR Regulatory criteria is not current.

**Table 1
Groundwater Analytical Results**

Analytical Parameters	NR 140 Standards		Well No./Sampling Date															
	ES	PAL	MW-8												PZ-8			
			2/16/06	5/30/06	8/29/06	11/15/06	11/15/06 Dup	2/19/08	5/21/08	3/20/09	7/8/09	10/6/11	11/4/11	2/28/13	3/1/13	2/28/13	3/1/13	
Elevation Data																		
Top of PVC	--	--	847.43	847.43	847.43	847.43	847.43	847.43	847.43	847.43	847.43	847.43	847.43	847.43	847.43	847.43	847.33	847.33
Top of Screen	--	--	846.38	846.38	846.38	846.38	846.38	846.38	846.38	846.38	846.38	846.38	846.38	846.38	846.38	846.38	825.03	825.03
Bottom of Screen	--	--	836.38	836.38	836.38	836.38	836.38	836.38	836.38	836.38	836.38	836.38	836.38	836.38	836.38	836.38	820.03	820.03
Groundwater	--	--	843.10	843.58	842.87	843.00	--	843.34	843.33	843.75	842.81	843.12	843.35	843.43	--	843.43	--	--
pH	NSE	NSE	7.28	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
DRO (µg/l)	NSE	NSE	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
PAHs¹ (µg/l)																		
Acenaphthene	NSE	NSE	<0.06	<0.06	<0.06	<0.067	<0.067	<0.38	<0.88	--	--	--	--	--	--	--	--	--
Acenaphthylene	NSE	NSE	<0.06	<0.06	<0.06	<0.067	<0.067	<0.80	<1.8	--	--	--	--	--	--	--	--	--
Anthracene	3,000	600	<0.09	<0.09	<0.09	<0.1	<0.1	<0.044	<0.10	--	--	--	--	--	--	--	--	--
Benzo(a)Anthracene	NSE	NSE	<0.1	<0.1	<0.1	<0.111	<0.111	<0.051	<0.12	--	--	--	--	--	--	--	--	--
Benzo(a)Pyrene	0.2	0.02	<0.02	<0.02	<0.02	<0.022	<0.022	<0.037	<0.085	--	--	--	--	--	--	--	--	--
Benzo(b)Fluoranthene	0.2	0.02	<0.02	<0.02	<u>0.068</u>	<0.022	<u>0.041</u>	<0.11	<0.26	--	--	--	--	--	--	--	--	--
Benzo(k)Fluoranthene	NSE	NSE	<0.07	<0.07	<0.07	<0.078	<0.078	<0.057	<0.13	--	--	--	--	--	--	--	--	--
Benzo(g,h,i)Perylene	NSE	NSE	<0.06	<0.06	0.175	0.276	0.344	<0.14	<0.32	--	--	--	--	--	--	--	--	--
Chrysene	0.2	0.02	<0.02	<0.02	<0.02	<u>0.029</u>	<u>0.049</u>	<0.048	<0.11	--	--	--	--	--	--	--	--	--
Dibenzo(a,h)Anthracene	NSE	NSE	<0.11	<0.11	<0.11	<0.122	<0.122	<0.15	<0.35	--	--	--	--	--	--	--	--	--
Fluoranthene	400	80	<0.12	<0.12	<0.12	<0.133	<0.133	<0.094	<0.22	--	--	--	--	--	--	--	--	--
Fluorene	400	80	<0.12	<0.12	<0.12	<0.133	<0.133	<0.072	<0.17	--	--	--	--	--	--	--	--	--
Indeno(1,2,3-cd)Pyrene	NSE	NSE	<0.12	<0.12	<0.12	<0.133	<0.133	<0.072	<0.17	--	--	--	--	--	--	--	--	--
1-Methyl Naphthalene	NSE	NSE	<0.08	<0.08	<0.08	<0.089	<0.089	<0.37	<0.85	--	--	--	--	--	--	--	--	--
2-Methyl Naphthalene	NSE	NSE	<0.11	<0.11	<0.11	<0.122	<0.122	<0.36	<0.83	--	--	--	--	--	--	--	--	--
Naphthalene	40	8.0	<0.11	<0.11	<0.11	<0.122	<0.122	<0.47	<1.1	--	--	--	--	--	--	--	--	--
Phenanthrene	NSE	NSE	<0.11	<0.11	<0.11	<0.122	<0.122	<0.035	<0.80	--	--	--	--	--	--	--	--	--
Pyrene	250	50	<0.1	<0.1	<0.1	<0.111	<0.111	<0.051	<0.12	--	--	--	--	--	--	--	--	--
VOCs² (µg/l)																		
Benzene	5.0	0.5	<0.15	<0.15	<0.15	<0.15	<0.15	<0.20	<0.20	--	--	<0.20	--	<0.074	--	<0.074	--	--
Bromobenzene	NSE	NSE	<0.1	<0.1	<0.1	<0.1	<0.1	<0.20	<0.20	--	--	<0.20	--	<0.25	--	<0.25	--	--
Bromochlororomethane	NSE	NSE	--	<0.1	<0.1	<0.1	<0.1	<0.50	<0.50	--	--	<0.50	--	<0.40	--	<0.40	--	--
Bromodichloromethane	0.6	0.06	<0.1	<0.1	<0.1	<0.1	<0.1	<0.20	<0.20	--	--	<0.20	--	<0.17	--	<0.17	--	--
Bromomethane	10	1.0	--	<0.15	<0.15	<0.15	<0.15	<0.20	<0.20	--	--	<0.50	--	<0.31	--	<0.31	--	--
n-Butylbenzene	NSE	NSE	<0.2	<0.2	<0.2	<0.2	<0.2	<0.20	<0.20	--	--	<0.20	--	<0.13	--	<0.13	--	--
sec-Butylbenzene	NSE	NSE	<0.15	<0.15	<0.15	<0.15	<0.15	<0.25	<0.25	--	--	<0.25	--	<0.15	--	<0.15	--	--
tert-Butylbenzene	NSE	NSE	<0.15	<0.15	<0.15	<0.15	<0.15	<0.20	<0.20	--	--	<0.20	--	<0.14	--	<0.14	--	--
Carbon Tetrachloride	5.0	0.5	<0.2	<0.2	<0.2	<0.2	<0.2	<0.50	<0.50	--	--	<0.80	--	<0.26	--	<0.26	--	--
Chlorobenzene	NSE	NSE	<0.1	<0.1	<0.1	<0.1	<0.1	<0.20	<0.20	--	--	<0.20	--	<0.14	--	<0.14	--	--
Chlorodibromomethane	NSE	NSE	<0.1	<0.1	<0.1	<0.1	<0.1	<0.20	<0.20	--	--	<0.20	--	<0.32	--	<0.32	--	--
Chloroethane	400	80	<0.6	<0.6	<0.6	<0.6	<0.6	<1.0	<1.0	--	--	<1.0	--	<0.34	--	<0.34	--	--
Chloroform	6.0	0.6	<0.1	<0.1	<0.1	<0.1	<0.1	<0.20	<0.20	--	--	<0.20	--	<0.20	--	<0.20	--	--
Chloromethane	3.0	0.3	<0.2	0.28	<0.2	<0.2	<0.2	<0.20	<0.20	--	--	<0.30	--	<0.18	--	<0.18	--	--
o-Chlorotoluene	NSE	NSE	<0.1	<0.1	<0.1	<0.1	<0.1	<0.50	<0.50	--	--	<0.50	--	<0.21	--	<0.21	--	--
p-Chlorotoluene	NSE	NSE	<0.2	<0.2	<0.2	<0.2	<0.2	<0.20	<0.20	--	--	<0.20	--	<0.20	--	<0.20	--	--
1,2-Dibromo-3-chloropropane	0.2	0.02	<0.3	<0.35	<0.35	<0.35	<0.35	<0.50	<0.50	--	--	<0.50	--	<0.87	--	<0.87	--	--
1,2-Dibromoethane	0.05	0.005	<0.1	<0.1	<0.1	<0.1	<0.1	<0.20	<0.20	--	--	<0.20	--	<0.36	--	<0.36	--	--

SOURCE:
SEH, 2019. Comprehensive Site Investigation Report
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Groundwater Analytical Results**

Analytical Parameters	NR 140 Standards		Well No./Sampling Date														
	ES	PAL	MW-8											PZ-8			
			2/16/06	5/30/06	8/29/06	11/15/06	11/15/06 Dup	2/19/08	5/21/08	3/20/09	7/8/09	10/6/11	11/4/11	2/28/13	3/1/13	2/28/13	3/1/13
VOCs² (µg/l)																	
1,2-Dichlorobenzene	600	60	<0.75	<0.75	<0.75	<0.75	<0.75	<0.20	<0.20	--	--	<0.27	--	<0.27	--	<0.27	--
1,3-Dichlorobenzene	1,250	125	<0.15	<0.15	<0.15	<0.15	<0.15	<0.20	<0.20	--	--	<0.15	--	<0.15	--	<0.15	--
1,4-Dichlorobenzene	75	15	<0.75	<0.75	<0.75	<0.75	<0.75	<0.20	<0.20	--	--	<0.15	--	<0.15	--	<0.15	--
Dichlorodifluoromethane	1,000	200	<0.25	<0.25	<0.25	<0.25	<0.25	<0.50	<0.50	--	--	<0.20	--	<0.20	--	<0.20	--
1,1-Dichloroethane	850	85	0.26	<0.15	<0.15	0.25	0.36	<0.50	<0.50	--	--	<0.19	--	<0.19	--	<0.19	--
1,2-Dichloroethane	5.0	0.5	<0.1	0.11	<0.1	<0.10	<0.10	<0.50	<0.50	--	--	<0.36	--	<0.36	--	<0.36	--
1,1-Dichloroethylene	7.0	0.7	<0.15	<0.15	<0.15	<0.15	<0.15	<0.50	<0.50	--	--	<0.31	--	<0.31	--	<0.31	--
cis-1,2-Dichloroethylene	70	7.0	5.06	<u>8.83</u>	4.86	2.86	2.61	<u>21</u>	<u>21</u>	72	<u>58</u>	<u>47</u>	--	91	--	<u>60</u>	--
trans-1,2-Dichloroethylene	100	20	<0.1	0.22	<0.1	<0.1	<0.1	<0.50	<0.50	--	--	0.6	--	1.1	--	1.1	--
1,2-Dichloropropane	5.0	0.5	<0.1	<0.1	<0.1	<0.1	<0.1	<0.50	<0.50	--	--	<0.20	--	<0.20	--	<0.20	--
1,3-Dichloropropane	NSE	NSE	<0.1	<0.1	<0.1	<0.1	<0.1	<0.25	<0.25	--	--	<0.13	--	<0.13	--	<0.13	--
2,2-Dichloropropane	NSE	NSE	<0.1	<0.1	<0.1	<0.1	<0.1	<0.50	<0.50	--	--	<0.32	--	<0.32	--	<0.32	--
1,1-Dichloropropene	NSE	NSE	<0.2	<0.3	<0.3	<0.3	<0.3	<0.50	<0.50	--	--	<0.34	--	<0.34	--	<0.34	--
cis-1,3-Dichloropropene	0.2	0.02	<0.1	<0.1	<0.1	<0.1	<0.1	<0.20	<0.20	--	--	<0.18	--	<0.18	--	<0.18	--
trans-1,3-Dichloropropene	0.2	0.02	<0.1	<0.1	<0.1	<0.1	<0.1	<0.20	<0.20	--	--	<0.21	--	<0.21	--	<0.21	--
Ethylbenzene	700	140	<0.1	<0.1	<0.1	<0.1	<0.1	<0.50	<0.50	--	--	<0.13	--	<0.13	--	<0.13	--
Hexachlorobutadiene	NSE	NSE	<1.00	<1.00	<1.00	<1.00	<1.00	<0.50	<0.50	--	--	<0.26	--	<0.26	--	<0.26	--
Isopropylbenzene	NSE	NSE	<0.1	<0.1	<0.1	<0.1	<0.1	<0.20	<0.20	--	--	<0.14	--	<0.14	--	<0.14	--
Isopropyl Ether	NSE	NSE	--	--	--	--	--	<0.50	<0.50	--	--	<0.15	--	<0.15	--	<0.15	--
p-Isopropyltoluene	NSE	NSE	<0.2	<0.2	<0.2	<0.2	<0.2	<0.20	<0.20	--	--	<0.17	--	<0.17	--	<0.17	--
Methyl tert Butyl Ether	60	12	<0.1	0.19	<0.10	<0.10	<0.10	<0.50	<0.50	--	--	<0.24	--	<0.24	--	<0.24	--
Methylene Chloride	5.0	0.5	<0.4	<0.4	<0.4	<0.4	<0.4	<1.0	<1.0	--	--	<0.68	--	<0.68	--	<0.68	--
Naphthalene	40	8.0	<1.00	<1.00	<1.00	<1.00	<1.00	<0.25	<0.25	--	--	<0.16	--	<0.16	--	<0.16	--
n-Propylbenzene	NSE	NSE	<0.1	<0.1	<0.1	<0.1	<0.1	<0.50	<0.50	--	--	<0.13	--	<0.13	--	<0.13	--
Tetrachloroethylene	5.0	0.5	0.236	<0.1	0.12	0.16	0.20	<0.50	<0.50	--	--	42	--	18	--	<u>11</u>	--
1,1,1,2-Tetrachloroethane	70	7.0	<0.1	<0.1	<0.1	<0.1	<0.1	<0.25	<0.25	--	--	<0.25	--	<0.25	--	<0.25	--
1,1,1,2,2-Tetrachloroethane	0.2	0.02	<0.1	<0.1	<0.1	<0.1	<0.1	<0.20	<0.20	--	--	<0.23	--	<0.23	--	<0.23	--
Toluene	1,000	200	0.4	<0.4	<0.4	<0.4	<0.4	<0.20	<0.20	--	--	<0.11	--	<0.11	--	<0.11	--
1,1,2-Trichloroethane	5.0	0.5	--	<0.1	<0.1	<0.1	<0.1	<0.25	<0.25	--	--	<0.28	--	<0.28	--	<0.28	--
Total Trimethylbenzenes	480	96	<0.3	<0.3	<0.3	<0.3	<0.3	<0.40	<0.40	--	--	--	--	--	--	--	--
1,2,3-Trichlorobenzene	NSE	NSE	<0.5	<0.5	<0.5	<0.5	<0.5	<0.25	<0.25	--	--	<0.24	--	<0.24	--	<0.24	--
1,2,4-Trichlorobenzene	70	14	<0.5	<0.5	<0.5	<0.5	<0.5	<0.25	<0.25	--	--	<0.31	--	<0.31	--	<0.31	--
1,1,1-Trichloroethane	200	40	0.241	<0.2	0.29	<0.2	<0.2	<0.50	<0.50	--	--	<0.20	--	<0.20	--	<0.20	--
Trichloroethylene	5.0	0.5	0.228	<u>2.66</u>	<u>1.93</u>	<u>1.11</u>	<u>1.06</u>	<u>1.6</u>	16	16	46	37	--	12	--	17	--
Trichlorofluoromethane	NSE	NSE	<0.2	<0.2	<0.2	<0.2	<0.2	<0.50	<0.50	--	--	<0.19	--	<0.19	--	<0.19	--
Vinyl Chloride	0.2	0.02	<0.15	<u>0.16</u>	<0.15	<0.15	<0.15	0.61	0.25	1.3	0.24	<0.10	--	2.7	--	<0.10	--
Total Xylenes	10,000	1,000	<0.5	<0.5	<0.5	<0.5	<0.5	<0.50	<0.50	--	--	<0.068	--	<0.068	--	<0.068	--
Metals (µg/l)																	
Arsenic	50	5.0	0.6	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Barium	2000	400	81	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Cadmium	5.0	0.5	<0.2	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Chromium	100	10	3.20	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Lead	15	1.5	<0.3	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Mercury	2.0	0.2	<0.07	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Selenium	50	10	0.96	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Silver	50	10	0.27	--	--	--	--	--	--	--	--	--	--	--	--	--	--

SOURCE:
SEH, 2019. Comprehensive Site Investigation Report
NOTE: WDNR Regulatory criteria is not current.

**Table 1
Groundwater Analytical Results**

Analytical Parameters	NR 140 Standards		Well No./Sampling Date																				
			MW-9										PZ-9										
	ES	PAL	2/16/06	5/30/06	8/29/06	8/29/06 Dup	11/15/06	2/19/08	5/21/08	3/20/09	7/8/09	10/5/11	11/4/11	2/28/13	3/1/13	2/19/08	5/21/08	3/20/09	7/8/09	10/5/11	11/4/11	2/28/13	3/1/13
Elevation Data																							
Top of PVC	--	--	851.82	851.82	851.82	851.82	851.82	851.82	851.82	851.82	851.82	851.82	851.82	851.82	851.82	851.65	851.65	851.65	851.65	851.65	851.65	851.65	851.65
Top of Screen	--	--	848.82	848.82	848.82	848.82	848.82	848.82	848.82	848.82	848.82	848.82	848.82	848.82	848.82	829.85	829.85	829.85	829.85	829.85	829.85	829.85	829.85
Bottom of Screen	--	--	838.82	838.82	838.82	838.82	838.82	838.82	838.82	838.82	838.82	838.82	838.82	838.82	838.82	824.85	824.85	824.85	824.85	824.85	824.85	824.85	824.85
Groundwater	--	--	--	845.31	845.17	--	844.16	844.66	845.10	846.02	844.36	845.10	844.51	844.57	--	844.45	844.46	845.14	843.72	844.17	844.33	843.85	--
pH	NSE	NSE	7.66	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
DRO (µg/l)	NSE	NSE	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
PAHs¹ (µg/l)																							
Acenaphthene	NSE	NSE	0.081	<0.06	<0.06	<0.06	<0.067	<0.38	<0.38	--	--	--	--	--	<0.38	<1.1	--	--	--	--	--	--	--
Acenaphthylene	NSE	NSE	<0.06	<0.06	<0.06	<0.06	<0.067	<0.79	<0.79	--	--	--	--	--	<0.80	<2.3	--	--	--	--	--	--	--
Anthracene	3,000	600	<0.09	<0.09	<0.09	<0.09	<0.1	<0.044	<0.044	--	--	--	--	--	<0.044	0.39	--	--	--	--	--	--	--
Benzo(a)Anthracene	NSE	NSE	<0.1	<0.1	<0.1	<0.1	<0.111	<0.051	<0.051	--	--	--	--	--	<0.051	1	--	--	--	--	--	--	--
Benzo(a)Pyrene	0.2	0.02	<u>0.167</u>	<0.02	<0.02	<0.02	<0.022	<0.037	<0.037	--	--	--	--	--	<0.037	<0.11	--	--	--	--	--	--	--
Benzo(b)Fluoranthene	0.2	0.02	<0.02	<0.02	<0.02	<0.02	<0.022	<0.11	<0.11	--	--	--	--	--	<0.11	<0.33	--	--	--	--	--	--	--
Benzo(k)Fluoranthene	NSE	NSE	<0.07	<0.07	<0.07	<0.07	<0.078	<0.056	<0.056	--	--	--	--	--	<0.057	<0.16	--	--	--	--	--	--	--
Benzo(g,h,i)Perylene	NSE	NSE	<0.06	<0.06	<0.06	<0.06	<0.067	<0.14	<0.14	--	--	--	--	--	<0.14	<0.40	--	--	--	--	--	--	--
Chrysene	0.2	0.02	<0.02	<0.02	<0.02	<0.02	<0.022	<0.047	<0.047	--	--	--	--	--	<0.048	0.37	<0.047	<0.041	--	--	--	--	--
Dibenzo(a,h)Anthracene	NSE	NSE	<0.11	<0.11	<0.11	<0.11	<0.122	<0.15	<0.15	--	--	--	--	--	<0.15	<0.43	--	--	--	--	--	--	--
Fluoranthene	400	80	<0.12	<0.12	<0.12	<0.12	<0.133	<0.093	<0.093	--	--	--	--	--	<0.094	3.2	--	--	--	--	--	--	--
Fluorene	400	80	<0.12	<0.12	<0.12	<0.12	<0.133	<0.071	<0.071	--	--	--	--	--	<0.072	<0.21	--	--	--	--	--	--	--
Indeno(1,2,3-cd)Pyrene	NSE	NSE	<0.12	<0.12	<0.12	<0.12	<0.133	<0.071	<0.071	--	--	--	--	--	<0.072	<0.21	--	--	--	--	--	--	--
1-Methyl Naphthalene	NSE	NSE	1.31	<0.08	<0.08	<0.08	<0.089	<0.37	<0.37	--	--	--	--	--	<0.37	<1.1	--	--	--	--	--	--	--
2-Methyl Naphthalene	NSE	NSE	2.73	<0.11	<0.11	<0.11	<0.122	<0.36	<0.36	--	--	--	--	--	<0.36	<1.0	--	--	--	--	--	--	--
Naphthalene	40	8.0	1.05	<0.11	<0.11	<0.11	<0.122	<0.46	<0.46	--	--	--	--	--	<0.47	<1.3	--	--	--	--	--	--	--
Phenanthrene	NSE	NSE	<0.11	<0.11	<0.11	<0.11	<0.122	<0.034	<0.034	--	--	--	--	--	<0.035	1.2	--	--	--	--	--	--	--
Pyrene	250	50	<0.1	<0.1	<0.1	<0.1	<0.111	<0.051	<0.051	--	--	--	--	--	<0.051	2.2	--	--	--	--	--	--	--
VOCs² (µg/l)																							
Benzene	5.0	0.5	<0.15	<0.15	<0.15	<0.15	<0.15	--	--	--	--	<0.20	--	<0.074	--	<0.20	<0.20	--	--	<0.20	--	<0.074	--
Bromobenzene	NSE	NSE	<0.1	<0.1	<0.1	<0.1	<0.1	--	--	--	--	<0.20	--	<0.25	--	<0.20	<0.20	--	--	<0.20	--	<0.25	--
Bromochloromethane	NSE	NSE	--	<0.1	<0.1	<0.1	<0.1	--	--	--	--	<0.50	--	<0.40	--	<0.50	<0.50	--	--	<0.50	--	<0.40	--
Bromodichloromethane	0.6	0.06	<0.1	<0.1	<0.1	<0.1	<0.1	--	--	--	--	<0.20	--	<0.17	--	<0.20	<0.20	--	--	<0.20	--	<0.17	--
Bromomethane	10	1.0	--	<0.15	<0.15	<0.15	<0.15	--	--	--	--	<0.50	--	<0.31	--	<0.20	<0.20	--	--	<0.50	--	<0.31	--
n-Butylbenzene	NSE	NSE	<0.2	<0.2	<0.2	<0.2	<0.2	--	--	--	--	<0.20	--	<0.13	--	<0.20	<0.20	--	--	<0.20	--	<0.13	--
sec-Butylbenzene	NSE	NSE	<0.15	<0.15	<0.15	<0.15	<0.15	--	--	--	--	<0.25	--	<0.15	--	<0.25	<0.25	--	--	<0.25	--	<0.15	--
tert-Butylbenzene	NSE	NSE	<0.15	<0.15	<0.15	<0.15	<0.15	--	--	--	--	<0.20	--	<0.14	--	<0.20	<0.20	--	--	<0.20	--	<0.14	--
Carbon Tetrachloride	5.0	0.5	<0.2	<0.2	<0.2	<0.2	<u>0.52</u>	--	--	<0.05	<0.05	<0.80	--	<0.26	--	<0.50	<0.50	--	--	<0.80	--	<0.26	--
Chlorobenzene	NSE	NSE	<0.1	<0.1	<0.1	<0.1	<0.1	--	--	--	--	<0.20	--	<0.14	--	<0.20	<0.20	--	--	<0.20	--	<0.14	--
Chlorodibromomethane	NSE	NSE	<0.1	<0.1	<0.1	<0.1	<0.1	--	--	--	--	<0.20	--	<0.32	--	<0.20	<0.20	--	--	<0.20	--	<0.32	--
Chloroethane	400	80	<0.6	<0.6	<0.6	<0.6	<0.6	--	--	--	--	<1.0	--	<0.34	--	<1.0	<1.0	--	--	<1.0	--	<0.34	--
Chloroform	6.0	0.6	<0.1	<0.1	<0.1	<0.1	<0.1	--	--	--	--	<0.20	--	<0.20	--	<0.20	<0.20	--	--	<0.20	--	<0.20	--
Chloromethane	3.0	0.3	<0.2	0.28	<0.20	<0.20	<0.20	--	--	--	--	<.30	--	<0.18	--	<0.20	<0.20	--	--	<0.30	--	<0.18	--
o-Chlorotoluene	NSE	NSE	<0.1	<0.1	<0.1	<0.1	<0.1	--	--	--	--	<0.50	--	<0.21	--	<0.50	<0.50	--	--	<0.50	--	<0.21	--
p-Chlorotoluene	NSE	NSE	<0.2	<0.2	<0.2	<0.2	<0.2	--	--	--	--	<0.20	--	<0.20	--	<0.20	<0.20	--	--	<0.20	--	<0.20	--
1,2-Dibromo-3-chloropropane	0.2	0.02	<0.3	<0.35	<0.35	<0.35	<0.35	--	--	--	--	<0.50	--	<0.87	--	<0.50	<0.50	--	--	<0.50	--	<0.87	--
1,2-Dibromoethane	0.05	0.005	<0.1	<0.1	<0.1	<0.1	<0.1	--	--	--	--	<0.20	--	<0.36	--	<0.20	<0.20	--	--	<0.20	--	<0.36	--

SOURCE:
SEH, 2019. Comprehensive Site Investigation Report
NOTE: WDNR Regulatory criteria is not current.

**Table 1
Groundwater Analytical Results**

Analytical Parameters	NR 140 Standards		Well No./Sampling Date																
	ES	PAL	MW-10									PZ-10							
			2/19/08	5/21/08	3/19/09	7/8/09	10/5/11	10/5/2011 Dup	11/4/11	2/28/13	3/1/13	2/19/08	5/21/08	3/19/09	7/8/09	10/5/11	11/4/11	2/28/13	3/1/13
Elevation Data																			
Top of PVC	--	--	849.79	849.79	849.79	849.79	849.79	849.79	849.79	849.79	849.79	849.69	849.69	849.69	849.69	849.69	849.69	849.69	849.69
Top of Screen	--	--	844.39	844.39	844.39	844.39	844.39	844.39	844.39	844.39	844.39	825.09	825.09	825.09	825.09	825.09	825.09	825.09	825.09
Bottom of Screen	--	--	834.39	834.39	834.39	834.39	834.39	834.39	834.39	834.39	834.39	820.09	820.09	820.09	820.09	820.09	820.09	820.09	820.09
Groundwater	--	--	843.04	842.85	844.41	842.37	842.59	--	842.87	843.14	--	843.17	843.00	844.59	842.54	842.69	842.79	843.11	--
pH	NSE	NSE	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
DRO (µg/l)	NSE	NSE	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
PAHs¹ (µg/l)																			
Acenaphthene	NSE	NSE	<0.37	<0.35	--	--	--	--	--	--	--	<0.38	<0.35	--	--	--	--	--	--
Acenaphthylene	NSE	NSE	<0.77	<0.73	--	--	--	--	--	--	--	<0.80	<0.73	--	--	--	--	--	--
Anthracene	3,000	600	<0.042	<0.040	--	--	--	--	--	--	--	<0.044	<0.040	--	--	--	--	--	--
Benzo(a)Anthracene	NSE	NSE	<0.049	0.048	--	--	--	--	--	--	--	<0.051	<0.046	--	--	--	--	--	--
Benzo(a)Pyrene	0.2	0.02	<0.036	<0.034	--	--	--	--	--	--	--	<0.037	<0.034	--	--	--	--	--	--
Benzo(b)Fluoranthene	0.2	0.02	<0.11	<0.10	--	--	--	--	--	--	--	<0.11	<0.10	--	--	--	--	--	--
Benzo(k)Fluoranthene	NSE	NSE	<0.054	<0.052	--	--	--	--	--	--	--	<0.057	<0.052	--	--	--	--	--	--
Benzo(g,h,i)Perylene	NSE	NSE	<0.13	<0.13	--	--	--	--	--	--	--	<0.14	<0.13	--	--	--	--	--	--
Chrysene	0.2	0.02	<0.046	<0.044	--	--	--	--	--	--	--	<0.048	<0.043	--	--	--	--	--	--
Dibenzo(a,h)Anthracene	NSE	NSE	<0.14	<0.14	--	--	--	--	--	--	--	<0.15	<0.14	--	--	--	--	--	--
Fluoranthene	400	80	<0.090	0.088	--	--	--	--	--	--	--	<0.094	<0.085	--	--	--	--	--	--
Fluorene	400	80	<0.069	<0.066	--	--	--	--	--	--	--	<0.072	<0.065	--	--	--	--	--	--
Indeno(1,2,3-cd)Pyrene	NSE	NSE	<0.069	<0.066	--	--	--	--	--	--	--	<0.072	<0.065	--	--	--	--	--	--
1-Methyl Naphthalene	NSE	NSE	<0.36	<0.34	--	--	--	--	--	--	--	<0.37	<0.34	--	--	--	--	--	--
2-Methyl Naphthalene	NSE	NSE	<0.34	<0.33	--	--	--	--	--	--	--	<0.36	<0.33	--	--	--	--	--	--
Naphthalene	40	8.0	<0.44	<0.43	--	--	--	--	--	--	--	<0.47	<0.42	--	--	--	--	--	--
Phenanthrene	NSE	NSE	<0.033	0.091	--	--	--	--	--	--	--	<0.035	<0.032	--	--	--	--	--	--
Pyrene	250	50	<0.049	<0.047	--	--	--	--	--	--	--	<0.051	<0.046	--	--	--	--	--	--
VOCs² (µg/l)																			
Benzene	5.0	0.5	<0.20	<0.20	--	--	<0.20	<0.20	--	<0.074	--	<0.20	<0.20	--	--	<0.20	--	<0.074	--
Bromobenzene	NSE	NSE	<0.20	<0.20	--	--	<0.20	<0.20	--	<0.25	--	<0.20	<0.20	--	--	<0.20	--	<0.25	--
Bromochloromethane	NSE	NSE	<0.50	<0.50	--	--	<0.50	<0.50	--	<0.40	--	<0.50	<0.50	--	--	<0.50	--	<0.40	--
Bromodichloromethane	0.6	0.06	<0.20	<0.20	--	--	<0.20	<0.20	--	<0.17	--	<0.20	<0.20	--	--	<0.20	--	<0.17	--
Bromomethane	10	1.0	<0.20	<0.20	--	--	<0.50	<0.50	--	<0.31	--	<0.20	<0.20	--	--	<0.50	--	<0.31	--
n-Butylbenzene	NSE	NSE	<0.20	<0.20	--	--	<0.20	<0.20	--	<0.13	--	<0.20	<0.20	--	--	<0.20	--	<0.13	--
sec-Butylbenzene	NSE	NSE	<0.25	<0.25	--	--	<0.25	<0.25	--	<0.15	--	<0.25	<0.25	--	--	<0.25	--	<0.15	--
tert-Butylbenzene	NSE	NSE	<0.20	<0.20	--	--	<0.20	<0.20	--	<0.14	--	<0.20	<0.20	--	--	<0.20	--	<0.14	--
Carbon Tetrachloride	5.0	0.5	<0.50	<0.50	--	--	<0.80	<0.80	--	<0.26	--	<0.50	<0.50	--	--	<0.80	--	<0.26	--
Chlorobenzene	NSE	NSE	<0.20	<0.20	--	--	<0.20	<0.20	--	<0.14	--	<0.20	<0.20	--	--	<0.20	--	<0.14	--
Chlorodibromomethane	NSE	NSE	<0.20	<0.20	--	--	<0.20	<0.20	--	<0.32	--	<0.20	<0.20	--	--	<0.20	--	<0.32	--
Chloroethane	400	80	<1.0	<1.0	--	--	<1.0	<1.0	--	<0.34	--	<1.0	<1.0	--	--	<1.0	--	<0.34	--
Chloroform	6.0	0.6	<0.20	<0.20	--	--	<0.20	<0.20	--	<0.20	--	<0.20	<0.20	--	--	<0.20	--	<0.20	--
Chloromethane	3.0	0.3	<0.20	<0.20	--	--	<0.30	<0.30	--	<0.18	--	<0.20	<0.20	--	--	<0.30	--	<0.18	--
o-Chlorotoluene	NSE	NSE	<0.50	<0.50	--	--	<0.50	<0.50	--	<0.21	--	<0.50	<0.50	--	--	<0.50	--	<0.21	--
p-Chlorotoluene	NSE	NSE	<0.20	<0.20	--	--	<0.20	<0.20	--	<0.20	--	<0.20	<0.20	--	--	<0.20	--	<0.20	--
1,2-Dibromo-3-chloropropane	0.2	0.02	<0.50	<0.50	--	--	<0.50	<0.50	--	<0.87	--	<0.50	<0.50	--	--	<0.50	--	<0.87	--
1,2-Dibromoethane	0.05	0.005	<0.20	<0.20	--	--	<0.20	<0.20	--	<0.36	--	<0.20	<0.20	--	--	<0.20	--	<0.36	--

SOURCE:
SEH, 2019. Comprehensive Site Investigation Report
NOTE: WDNR Regulatory criteria is not current.

**Table 1
Groundwater Analytical Results**

Analytical Parameters	NR 140 Standards		Well No./Sampling Date																
	ES	PAL	MW-10									PZ-10							
			2/19/08	5/21/08	3/19/09	7/8/09	10/5/11	10/5/2011 Dup	11/4/11	2/28/13	3/1/13	2/19/08	5/21/08	3/19/09	7/8/09	10/5/11	11/4/11	2/28/13	3/1/13
VOCs² (µg/l)																			
1,2-Dichlorobenzene	600	60	<0.20	<0.20	--	--	<0.20	--	--	<0.27	--	<0.20	<0.20	--	--	<0.20	--	<0.27	--
1,3-Dichlorobenzene	1,250	125	<0.20	<0.20	--	--	<0.20	--	--	<0.15	--	<0.20	<0.20	--	--	<0.20	--	<0.15	--
1,4-Dichlorobenzene	75	15	<0.20	<0.20	--	--	<0.50	--	--	<0.15	--	<0.20	<0.20	--	--	<0.50	--	<0.15	--
Dichlorodifluoromethane	1,000	200	<0.50	<0.50	--	--	<0.50	--	--	<0.20	--	<0.50	<0.50	--	--	<0.50	--	<0.20	--
1,1-Dichloroethane	850	85	<0.50	<0.50	--	--	<0.50	--	--	<0.19	--	<0.50	<0.50	--	--	<0.50	--	<0.19	--
1,2-Dichloroethane	5.0	0.5	<0.50	<0.50	--	--	<0.50	--	--	<0.28	--	<u>1.8</u>	<u>1.3</u>	7.0	13	48	--	50	--
1,1-Dichloroethylene	7.0	0.7	<0.50	<0.50	--	--	<0.50	--	--	<0.31	--	<0.50	<0.50	--	--	<0.50	--	<0.31	--
cis-1,2-Dichloroethylene	70	7.0	<0.50	<0.50	--	--	<0.50	--	--	<0.12	--	<0.50	0.56	--	--	3.4	--	4.8	--
trans-1,2-Dichloroethylene	100	20	<0.50	<0.50	--	--	<0.50	--	--	<0.25	--	<0.50	<0.50	--	--	<0.50	--	<0.25	--
1,2-Dichloropropane	5.0	0.5	<0.50	<0.50	--	--	<0.50	--	--	<0.20	--	<0.50	<0.50	--	--	<0.50	--	<0.20	--
1,3-Dichloropropane	NSE	NSE	<0.25	<0.25	--	--	<0.25	--	--	<0.13	--	<0.25	<0.25	--	--	<0.25	--	<0.13	--
2,2-Dichloropropane	NSE	NSE	<0.50	<0.50	--	--	<0.50	--	--	<0.32	--	<0.50	<0.50	--	--	<0.50	--	<0.32	--
1,1-Dichloropropene	NSE	NSE	<0.50	<0.50	--	--	<0.50	--	--	<0.34	--	<0.50	<0.50	--	--	<0.50	--	<0.34	--
cis-1,3-Dichloropropene	0.2	0.02	<0.20	<0.20	--	--	<0.20	--	--	<0.18	--	<0.20	<0.20	--	--	<0.20	--	<0.18	--
trans-1,3-Dichloropropene	0.2	0.02	<0.20	<0.20	--	--	<0.20	--	--	<0.21	--	<0.20	<0.20	--	--	<0.20	--	<0.21	--
Ethylbenzene	700	140	<0.50	<0.50	--	--	<0.50	--	--	<0.13	--	<0.50	<0.50	--	--	<0.50	--	<0.13	--
Hexachlorobutadiene	NSE	NSE	<0.50	<0.50	--	--	<0.50	--	--	<0.26	--	<0.50	<0.50	--	--	<0.50	--	<0.26	--
Isopropylbenzene	NSE	NSE	<0.20	<0.20	--	--	<0.20	--	--	<0.14	--	<0.20	<0.20	--	--	<0.20	--	<0.14	--
Isopropyl Ether	NSE	NSE	<0.50	<0.50	--	--	<0.50	--	--	<0.15	--	<0.50	<0.50	--	--	<0.50	--	<0.15	--
p-Isopropyltoluene	NSE	NSE	<0.20	<0.20	--	--	<0.20	--	--	<0.17	--	<0.20	<0.20	--	--	<0.20	--	<0.17	--
Methyl tert Butyl Ether	60	12	<0.50	<0.50	--	--	<0.50	--	--	<0.24	--	<0.50	<0.50	--	--	<0.50	--	<0.24	--
Methylene Chloride	5.0	0.5	<1.0	<1.0	--	--	<1.0	--	--	<0.68	--	<1.0	<1.0	--	--	<1.0	--	<0.68	--
Naphthalene	40	8.0	<0.25	<0.25	--	--	<0.25	--	--	<0.16	--	<0.25	<0.25	--	--	<0.25	--	<0.16	--
n-Propylbenzene	NSE	NSE	<0.50	<0.50	--	--	<0.50	--	--	<0.13	--	<0.50	<0.50	--	--	<0.50	--	<0.13	--
Tetrachloroethylene	5.0	0.5	<0.50	<0.50	--	--	<0.50	--	--	<0.17	--	<0.50	<0.50	--	--	<0.50	--	<0.17	--
1,1,1,2-Tetrachloroethane	70	7.0	<0.25	<0.25	--	--	<0.25	--	--	<0.25	--	<0.25	<0.25	--	--	<0.25	--	<0.25	--
1,1,2,2-Tetrachloroethane	0.2	0.02	<0.20	<0.20	--	--	<0.20	--	--	<0.23	--	<0.20	<0.20	--	--	<0.20	--	<0.23	--
Toluene	1,000	200	<0.20	<0.20	--	--	<0.50	--	--	<0.11	--	0.26	0.26	--	--	<0.50	--	<0.11	--
1,1,2-Trichloroethane	5.0	0.5	<0.25	<0.25	--	--	<0.25	--	--	<0.28	--	<0.25	<0.25	--	--	<0.25	--	<0.28	--
Total Trimethylbenzenes	480	96	<0.40	<0.40	--	--	--	--	--	<0.18	--	<0.40	<0.40	--	--	--	--	--	--
1,2,3-Trichlorobenzene	NSE	NSE	<0.25	<0.25	--	--	<0.25	--	--	<0.24	--	<0.25	<0.25	--	--	<0.25	--	<0.24	--
1,2,4-Trichlorobenzene	70	14	<0.25	<0.25	--	--	<0.25	--	--	<0.31	--	<0.25	<0.25	--	--	<0.25	--	<0.31	--
1,1,1-Trichloroethane	200	40	<0.50	<0.50	--	--	<0.50	--	--	<0.20	--	<0.50	<0.50	--	--	<0.50	--	<0.20	--
Trichloroethylene	5.0	0.5	<0.20	<0.20	--	--	<0.20	--	--	<0.19	--	<0.20	<0.20	--	--	<0.20	--	<0.19	--
Trichlorofluoromethane	NSE	NSE	<0.50	<0.50	--	--	<0.50	--	--	<0.19	--	<0.50	<0.50	--	--	<0.50	--	<0.19	--
Vinyl Chloride	0.2	0.02	<0.20	<0.20	<0.016	--	<0.20	--	--	<0.10	--	<0.20	<0.20	<u>0.17</u>	0.26	0.33	--	<0.10	--
Total Xylenes	10,000	1,000	<0.50	<0.50	--	--	<0.50	--	--	<0.068	--	<0.50	<0.50	--	--	<0.50	--	<0.068	--
Metals (µg/l)																			
Arsenic	50	5.0	1.6	2.4	--	--	--	--	--	--	--	0.47	0.48	--	--	--	--	--	--
Barium	2000	400	73	68	--	--	--	--	--	--	--	48	42	--	--	--	--	--	--
Cadmium	5.0	0.5	0.020	<0.12	--	--	--	--	--	--	--	0.040	<0.12	--	--	--	--	--	--
Chromium	100	10	2.0	3.3	--	--	--	--	--	--	--	1.9	3.0	--	--	--	--	--	--
Lead	15	1.5	0.090	<0.12	--	--	--	--	--	--	--	<0.040	<0.12	--	--	--	--	--	--
Mercury	2.0	0.2	0.000092	0.000071	--	--	--	--	--	--	--	0.000091	<0.000065	--	--	--	--	--	--
Selenium	50	10	<0.17	0.37	--	--	--	--	--	--	--	<0.17	0.13	--	--	--	--	--	--
Silver	50	10	0.020	<0.12	--	--	--	--	--	--	--	0.020	<0.12	--	--	--	--	--	--

SOURCE:
SEH, 2019. Comprehensive Site Investigation Report
NOTE: WDNR Regulatory criteria is not current.

**Table 1
Groundwater Analytical Results**

Analytical Parameters	NR 140 Standards		Well No./Sampling Date													
			East Sump						West Sump							
	ES	PAL	2/16/06	3/20/09	7/8/09	10/5/11	2/28/13	3/1/13	2/16/06	5/30/06	8/29/06	11/15/06	2/19/08	5/21/08	2/28/13	3/1/13
pH	NSE	NSE	7.31	--	--	--	--	--	8.00	--	--	--	--	--	--	--
DRO (µg/l)	NSE	NSE	3,864,059	130,000	<0.10	--	--	--	--	--	--	--	--	--	--	--
PAHs¹ (µg/l)																
Acenaphthene	NSE	NSE	<6.90	<0.99	<0.33	--	--	--	<0.06	<0.06	<0.06	<0.067	<0.40	<0.34	--	--
Acenaphthylene	NSE	NSE	<6.90	<2.1	<0.69	--	--	--	<0.06	<0.06	<0.06	<0.067	<0.84	<0.72	--	--
Anthracene	3,000	600	<10.4	0.12	<0.038	--	--	--	<0.09	<0.09	<0.09	<0.1	<0.046	<0.040	--	--
Benzo(a)Anthracene	NSE	NSE	<11.5	<0.13	<0.044	--	--	--	<0.1	<0.1	<0.1	<0.111	<0.054	<0.046	--	--
Benzo(a)Pyrene	0.2	0.02	<2.3	<0.096	<0.032	--	--	--	<0.02	<0.02	<0.02	<0.022	<0.039	<0.033	--	--
Benzo(b)Fluoranthene	0.2	0.02	<2.3	0.30	<0.098	--	--	--	<u>0.035</u>	<u>0.095</u>	<u>0.114</u>	<0.022	<0.12	<0.10	--	--
Benzo(k)Fluoranthene	NSE	NSE	<8.05	<0.15	<0.049	--	--	--	<0.07	<0.07	<0.07	<0.078	<0.060	<0.051	--	--
Benzo(g,h,i)Perylene	NSE	NSE	<6.90	<0.36	<0.12	--	--	--	0.094	0.065	<0.06	<0.067	<0.15	<0.12	--	--
Chrysene	0.2	0.02	<2.30	<0.12	<0.041	--	--	--	<u>0.045</u>	<u>0.143</u>	<u>0.188</u>	<0.022	<0.05	<0.043	--	--
Dibenzo(a,h)Anthracene	NSE	NSE	<12.7	<0.39	<0.13	--	--	--	<0.11	<0.11	<0.11	<0.122	<0.16	<0.14	--	--
Fluoranthene	400	80	<13.8	0.65	<0.081	--	--	--	<0.12	0.162	<0.12	<0.133	<0.099	<0.084	--	--
Fluorene	400	80	<13.8	<0.19	<0.062	--	--	--	<0.12	<0.12	<0.12	<0.133	<0.076	<0.065	--	--
Indeno(1,2,3-cd)Pyrene	NSE	NSE	<13.8	<0.19	<0.062	--	--	--	<0.12	0.120	<0.12	<0.133	<0.076	<0.065	--	--
1-Methyl Naphthalene	NSE	NSE	<9.2	<0.96	<0.32	--	--	--	<0.08	<0.08	<0.08	<0.089	<0.39	<0.33	--	--
2-Methyl Naphthalene	NSE	NSE	<12.7	<0.93	<0.31	--	--	--	<0.11	<0.11	<0.11	<0.122	<0.38	<0.32	--	--
Naphthalene	40	8.0	<12.7	<1.2	<0.40	--	--	--	<0.11	<0.11	<0.11	<0.122	<0.49	<0.42	--	--
Phenanthrene	NSE	NSE	<12.7	0.15	<0.03	--	--	--	<0.11	0.116	0.303	<0.122	<0.037	<0.031	--	--
Pyrene	250	50	<11.5	<0.13	<0.044	--	--	--	<0.1	<0.1	<0.1	<0.111	<0.054	<0.046	--	--
VOCs² (µg/l)																
Benzene	5.0	0.5	<0.15	<0.20	<0.20	<0.20	--	<0.074	<0.15	<0.15	<0.15	<0.15	--	--	--	--
Bromobenzene	NSE	NSE	<0.1	<0.20	<0.20	<0.20	--	<0.25	<0.1	<0.1	<0.1	<0.1	--	--	--	--
Bromochloromethane	NSE	NSE	--	<0.50	<0.50	<0.50	--	<0.40	--	<0.1	<0.1	<0.1	--	--	--	--
Bromodichloromethane	0.6	0.06	<0.1	<0.20	<0.20	<0.20	--	<0.17	<0.1	<0.1	<0.1	<0.1	--	--	--	--
Bromomethane	10	1.0	--	<0.50	<0.50	<0.50	--	<0.31	--	<0.15	<0.15	<0.15	--	--	--	--
n-Butylbenzene	NSE	NSE	<0.2	<0.20	<0.20	<0.20	--	<0.13	<0.2	<0.2	<0.2	<0.2	--	--	--	--
sec-Butylbenzene	NSE	NSE	<0.15	<0.25	<0.25	<0.25	--	<0.15	<0.15	<0.15	<0.15	<0.15	--	--	--	--
tert-Butylbenzene	NSE	NSE	<0.15	<0.20	<0.20	<0.20	--	<0.14	<0.15	<0.15	<0.15	<0.15	--	--	--	--
Carbon Tetrachloride	5.0	0.5	<0.2	<0.50	<0.50	<0.80	--	<0.26	<0.2	<0.2	<0.2	<0.2	--	--	--	--
Chlorobenzene	NSE	NSE	<0.1	<0.20	<0.20	<0.20	--	<0.14	<0.1	<0.1	<0.1	<0.1	--	--	--	--
Chlorodibromomethane	NSE	NSE	<0.1	<0.20	<0.20	<0.20	--	<0.32	<0.1	<0.1	<0.1	<0.1	--	--	--	--
Chloroethane	400	80	<0.6	<1.0	<1.0	<1.0	--	<0.34	<0.6	<0.6	<0.6	<0.6	--	--	--	--
Chloroform	6.0	0.6	<0.1	<0.20	<0.20	<0.20	--	<0.20	<0.1	<0.1	<0.1	<0.1	--	--	--	--
Chloromethane	3.0	0.3	<0.2	<0.30	<0.30	<0.30	--	<0.18	<0.2	0.22	<0.2	<0.2	--	--	--	--
o-Chlorotoluene	NSE	NSE	<0.1	<0.50	<0.50	<0.50	--	<0.21	<0.1	<0.1	<0.1	<0.1	--	--	--	--
p-Chlorotoluene	NSE	NSE	<0.2	<0.20	<0.20	<0.20	--	<0.20	<0.2	<0.2	<0.2	<0.2	--	--	--	--
1,2-Dibromo-3-chloropropane	0.2	0.02	<0.3	<0.50	<0.50	<0.50	--	<0.87	<0.3	<0.35	<0.35	<0.35	--	--	--	--
1,2-Dibromoethane	0.05	0.005	<0.1	<0.20	<0.20	<0.20	--	<0.36	<0.1	<0.1	<0.1	<0.1	--	--	--	--
1,2-Dichlorobenzene	600	60	<0.75	<0.20	<0.20	<0.20	--	<0.27	<0.75	<0.75	<0.75	<0.75	--	--	--	--
1,3-Dichlorobenzene	1,250	125	<0.15	<0.20	<0.20	<0.20	--	<0.13	<0.15	<0.15	<0.15	<0.15	--	--	--	--
1,4-Dichlorobenzene	75.0	15	<0.75	<0.50	<0.50	<0.50	--	<0.15	<0.75	<0.75	<0.75	<0.75	--	--	--	--
Dichlorodifluoromethane	1000.0	200	<0.25	<0.50	<0.50	<0.50	--	<0.20	<0.25	<0.25	<0.25	<0.25	--	--	--	--
1,1-Dichloroethane	850	85	<0.15	<0.50	<0.50	<0.50	--	<0.19	<0.15	<0.15	<0.15	<0.15	--	--	--	--
1,2-Dichloroethane	5.0	0.5	<0.1	<0.50	<0.50	<0.50	--	<0.28	<0.1	<0.1	<0.1	<0.1	--	--	--	--
1,1-Dichloroethylene	7.0	0.7	<0.15	<0.50	<0.50	<0.50	--	<0.31	<0.15	<0.15	<0.15	<0.15	--	--	--	--

SOURCE:
SEH, 2019. Comprehensive Site Investigation Report
NOTE: WDNR Regulatory criteria is not current.

**Table 1
Groundwater Analytical Results**

Analytical Parameters	NR 140 Standards		Well No./Sampling Date													
	ES	PAL	East Sump						West Sump							
			2/16/06	3/20/09	7/8/09	10/5/11	2/28/13	3/1/13	2/16/06	5/30/06	8/29/06	11/15/06	2/19/08	5/21/08	2/28/13	3/1/13
VOCS² (µg/l)																
cis-1,2-Dichloroethylene	70	7.0	2.06	<u>9.8</u>	5.0	<u>20.0</u>	--	<u>43.0</u>	<0.2	<0.2	<0.2	<0.2	--	--	--	--
trans-1,2-Dichloroethylene	100	20	<0.1	<0.50	<0.50	<0.50	--	0.78 (J)	<0.1	<0.1	<0.1	<0.1	--	--	--	--
1,2-Dichloropropane	5.0	0.5	<0.1	<0.50	<0.50	<0.50	--	<0.20	<0.1	<0.1	<0.1	<0.1	--	--	--	--
1,3-Dichloropropane	NSE	NSE	<0.1	<0.25	<0.25	<0.25	--	<0.13	<0.1	<0.1	<0.1	<0.1	--	--	--	--
2,2-Dichloropropane	NSE	NSE	<0.1	<0.50	<0.50	<0.50	--	<0.32	<0.1	<0.1	<0.1	<0.1	--	--	--	--
1,1-Dichloropropene	NSE	NSE	<0.2	<0.50	<0.50	<0.50	--	<0.34	<0.2	<0.3	<0.3	<0.3	--	--	--	--
cis-1,3-Dichloropropene	0.2	0.02	<0.1	<0.20	<0.20	<0.20	--	<0.18	<0.1	<0.1	<0.1	<0.1	--	--	--	--
trans-1,3-Dichloropropene	0.2	0.0	<0.1	<0.20	<0.20	<0.20	--	<0.21	<0.1	<0.1	<0.1	<0.1	--	--	--	--
Ethylbenzene	700	140	<0.1	<0.50	<0.50	<0.50	--	<0.13	<0.1	<0.1	<0.1	<0.1	--	--	--	--
Hexachlorobutadiene	NSE	NSE	<1.00	<0.50	<0.50	<0.50	--	<0.26	<1.00	<1.00	<1.00	<1.00	--	--	--	--
Isopropylbenzene	NSE	NSE	<0.1	<0.20	<0.20	<0.20	--	<0.14	<0.1	<0.1	<0.1	<0.1	--	--	--	--
Isopropyl Ether	NSE	NSE	--	--	--	<0.50	--	<0.15	--	--	--	--	--	--	--	--
p-Isopropyltoluene	NSE	NSE	<0.2	<0.20	<0.20	<0.20	--	<0.17	<0.2	<0.2	<0.2	<0.2	--	--	--	--
Methyl tert Butyl Ether	60	12	<0.1	<0.50	<0.50	<0.50	--	<0.24	<0.1	0.32	<0.1	<0.1	--	--	--	--
Methylene Chloride	5.0	0.5	<0.4	<1.0	<1.0	<1.0	--	<0.68	<0.4	<0.4	<0.4	<0.4	--	--	--	--
Naphthalene	40	8.0	<1.00	<0.25	<0.25	<0.25	--	<0.16	<1.00	<1.00	<1.00	<1.00	--	--	--	--
n-Propylbenzene	NSE	NSE	<0.1	<0.50	<0.50	<0.50	--	<0.13	<0.1	<0.1	<0.1	<0.1	--	--	--	--
Tetrachloroethylene	5.0	0.5	<0.1	<u>0.63</u>	<u>2.1</u>	<u>1.2</u>	--	15	<0.1	<0.1	<0.1	<0.1	--	--	--	--
1,1,1,2-Tetrachloroethane	70	7.0	<0.1	<0.25	<0.25	<0.25	--	<0.25	<0.1	<0.1	<0.1	<0.1	--	--	--	--
1,1,2,2-Tetrachloroethane	0.2	0.02	<0.1	<0.20	<0.20	<0.20	--	<0.23	<0.1	<0.1	<0.1	<0.1	--	--	--	--
Toluene	1,000	200	<0.4	<0.50	<0.50	<0.50	--	<0.11	<0.4	<0.4	<0.4	<0.4	--	--	--	--
1,1,2-Trichloroethane	5.0	0.5	--	<0.25	<0.25	<0.25	--	<0.28	--	<0.1	<0.1	<0.1	--	--	--	--
Total Trimethylbenzenes	480	96.0	<0.3	<0.40	<0.40	--	--	--	<0.3	<0.3	<0.3	<0.3	--	--	--	--
1,2,3-Trichlorobenzene	NSE	NSE	<0.5	<0.25	<0.25	<0.25	--	<0.24	<0.5	<0.5	<0.5	<0.5	--	--	--	--
1,2,4-Trichlorobenzene	70.0	14	<0.5	<0.25	<0.25	<0.25	--	<0.31	<0.5	<0.5	<0.5	<0.5	--	--	--	--
1,1,1-Trichloroethane	200	40.0	<0.2	<0.50	<0.50	<0.50	--	<0.20	<0.2	<0.2	<0.2	<0.2	--	--	--	--
Trichloroethylene	5.0	0.5	0.293	<u>4.7</u>	6.4	<u>3.5</u>	--	19	<0.2	<0.2	<0.2	<0.2	--	--	--	--
Trichlorofluoromethane	NSE	NSE	<0.2	<0.50	<0.50	<0.50	--	<0.19	<0.2	<0.2	<0.2	<0.2	--	--	--	--
Vinyl Chloride	0.2	0.02	<0.15	<0.20	<0.20	<0.20	--	<0.10	<0.15	<0.15	<0.15	<0.15	--	--	--	--
Total Xylenes	10,000	1,000	<0.5	<0.50	<0.50	<0.50	--	<0.068	<0.5	<0.5	<0.5	<0.5	--	--	--	--
Metals (µg/l)																
Arsenic	50	5.0	<0.125	--	--	--	--	--	1.0	--	--	--	--	--	--	--
Barium	2000	400	<0.0375	--	--	--	--	--	33.4	--	--	--	--	--	--	--
Cadmium	5.0	0.5	<0.0212	--	--	--	--	--	<0.2	--	--	--	--	--	--	--
Chromium	100	10	<0.0351	--	--	--	--	--	2.10	--	--	--	--	--	--	--
Lead	15	1.5	<0.2	--	--	--	--	--	<0.3	--	--	--	--	--	--	--
Mercury	2.0	0.2	<0.07	--	--	--	--	--	<0.07	--	--	--	--	--	--	--
Selenium	50	10	0.225	--	--	--	--	--	1.50	--	--	--	--	--	--	--
Silver	50	10	<0.075	--	--	--	--	--	<0.2	--	--	--	--	--	--	--

NSE = No standard established

-- = No data or not analyzed for

Bold = Exceeds ch. NR 140 Enforcement Standard (ES)

Underline = Exceeds ch. NR 140 Preventive Action Limit (PAL)

¹ = PAHs is the acronym for polynuclear aromatic hydrocarbons

² = VOCs is the acronym for volatile organic compounds

Compiled by: JEG Checked by: FJM

SOURCE:
SEH, 2019. Comprehensive Site Investigation Report
NOTE: WDNR Regulatory criteria is not current.

**Table 1
Groundwater Analytical Results**

Analytical Parameters	NR 140 Standards		Well No./Sampling Date											
	ES	PAL	Large Sump											
			2/16/06	5/30/06	8/29/06	11/15/06	2/19/08	5/21/08	3/20/09	7/8/09	10/5/11	2/28/13	3/1/13	
pH	NSE	NSE	7.51	--	--	--	--	--	--	--	--	--	--	--
DRO (µg/l)	NSE	NSE	--	--	--	--	--	--	--	--	--	--	--	--
PAHs¹ (µg/l)														
Acenaphthene	NSE	NSE	<0.06	<0.06	<0.06	<0.071	--	--	--	--	--	--	--	--
Acenaphthylene	NSE	NSE	<0.06	<0.06	<0.06	<0.071	--	--	--	--	--	--	--	--
Anthracene	3,000	600	<0.09	<0.09	<0.09	<0.106	--	--	--	--	--	--	--	--
Benzo(a)Anthracene	NSE	NSE	<0.1	<0.1	<0.1	<0.118	--	--	--	--	--	--	--	--
Benzo(a)Pyrene	0.2	0.02	<0.02	<0.02	<0.02	<0.024	--	--	--	--	--	--	--	--
Benzo(b)Fluoranthene	0.2	0.02	<0.02	<0.02	<0.02	<0.024	--	--	--	--	--	--	--	--
Benzo(k)Fluoranthene	NSE	NSE	<0.07	<0.07	<0.07	<0.082	--	--	--	--	--	--	--	--
Benzo(g,h,i)Perylene	NSE	NSE	<0.06	<0.06	<0.06	<0.071	--	--	--	--	--	--	--	--
Chrysene	0.2	0.02	<0.02	<0.02	<0.02	<0.024	--	--	--	--	--	--	--	--
Dibenzo(a,h)Anthracene	NSE	NSE	<0.11	<0.11	<0.11	<0.129	--	--	--	--	--	--	--	--
Fluoranthene	400	80	<0.12	<0.12	<0.12	<0.141	--	--	--	--	--	--	--	--
Fluorene	400	80	<0.12	<0.12	<0.12	<0.141	--	--	--	--	--	--	--	--
Indeno(1,2,3-cd)Pyrene	NSE	NSE	<0.12	<0.12	<0.12	<0.141	--	--	--	--	--	--	--	--
1-Methyl Naphthalene	NSE	NSE	<0.08	<0.08	<0.08	<0.094	--	--	--	--	--	--	--	--
2-Methyl Naphthalene	NSE	NSE	<0.11	<0.11	<0.11	<0.129	--	--	--	--	--	--	--	--
Naphthalene	40	8.0	<0.11	<0.11	<0.11	<0.129	--	--	--	--	--	--	--	--
Phenanthrene	NSE	NSE	<0.11	<0.11	<0.11	<0.129	--	--	--	--	--	--	--	--
Pyrene	250	50	<0.1	<0.1	<0.1	<0.118	--	--	--	--	--	--	--	--
VOCS² (µg/l)														
Benzene	5.0	0.5	<0.15	<0.15	<0.15	<0.15	<0.20	<0.20	--	--	<0.20	<0.074	--	--
Bromobenzene	NSE	NSE	<0.1	<0.1	<0.1	<0.1	<0.20	<0.20	--	--	<0.20	<0.25	--	--
Bromochloromethane	NSE	NSE	--	<0.1	<0.1	<0.1	<0.50	<0.50	--	--	<0.50	<0.40	--	--
Bromodichloromethane	0.6	0.06	<0.1	<0.1	<0.1	<0.1	<0.20	<0.20	--	--	<0.20	<0.17	--	--
Bromomethane	10	1.0	--	<0.15	<0.15	<0.15	<0.20	<0.20	--	--	<0.50	<0.31	--	--
n-Butylbenzene	NSE	NSE	<0.2	<0.2	<0.2	<0.2	<0.20	<0.20	--	--	<0.20	<0.13	--	--
sec-Butylbenzene	NSE	NSE	<0.15	<0.15	<0.15	<0.15	<0.25	<0.25	--	--	<0.25	<0.15	--	--
tert-Butylbenzene	NSE	NSE	<0.15	<0.15	<0.15	<0.15	<0.20	<0.20	--	--	<0.20	<0.14	--	--
Carbon Tetrachloride	5.0	0.5	<0.2	<0.2	<0.2	<0.2	<0.50	<0.50	--	--	<0.80	<0.26	--	--
Chlorobenzene	NSE	NSE	<0.1	<0.1	<0.1	<0.1	<0.20	<0.20	--	--	<0.20	<0.14	--	--
Chlorodibromomethane	NSE	NSE	<0.1	<0.1	<0.1	<0.1	<0.20	<0.20	--	--	<0.20	<0.32	--	--
Chloroethane	400	80	<0.6	<0.6	<0.6	<0.6	<1.0	<1.0	--	--	<1.0	<0.34	--	--
Chloroform	6.0	0.6	<0.1	<0.1	<0.1	<0.1	<0.20	<0.20	--	--	<0.20	<0.20	--	--
Chloromethane	3.0	0.3	<0.2	<0.2	<0.2	<0.2	<0.20	<0.20	--	--	<0.30	<0.18	--	--
o-Chlorotoluene	NSE	NSE	<0.1	<0.1	<0.1	<0.1	<0.50	<0.50	--	--	<0.50	<0.21	--	--
p-Chlorotoluene	NSE	NSE	<0.2	<0.2	<0.2	<0.2	<0.20	<0.20	--	--	<0.20	<0.20	--	--
1,2-Dibromo-3-chloropropane	0.2	0.02	<0.3	<0.35	<0.35	<0.35	<0.50	<0.50	--	--	<0.50	<0.87	--	--
1,2-Dibromoethane	0.05	0.005	<0.1	<0.1	<0.1	<0.1	<0.20	<0.20	--	--	<0.20	<0.36	--	--
1,2-Dichlorobenzene	600	60	<0.75	<0.75	<0.75	<0.75	<0.20	<0.20	--	--	<0.20	<0.27	--	--
1,3-Dichlorobenzene	1,250	125	<0.15	<0.15	<0.15	<0.15	<0.20	<0.20	--	--	<0.20	<0.13	--	--
1,4-Dichlorobenzene	75.0	15	<0.75	<0.75	<0.75	<0.75	<0.20	<0.20	--	--	<0.50	<0.15	--	--
Dichlorodifluoromethane	1000.0	200	<0.25	<0.25	<0.25	<0.25	<0.50	<0.50	--	--	<0.50	<0.20	--	--
1,1-Dichloroethane	850	85	<0.15	<0.15	<0.15	<0.15	<0.50	<0.50	--	--	<0.50	<0.19	--	--
1,2-Dichloroethane	5.0	0.5	<0.1	<0.1	<0.1	<0.1	<0.50	<0.50	--	--	<0.50	<0.28	--	--
1,1-Dichloroethylene	7.0	0.7	<0.15	<0.15	<0.15	<0.15	<0.50	<0.50	--	--	<0.50	<0.31	--	--

SOURCE:
SEH, 2019. Comprehensive Site Investigation Report
NOTE: WDNR Regulatory criteria is not current.

**Table 1
Groundwater Analytical Results**

Analytical Parameters	NR 140 Standards		Well No./Sampling Date														
	ES	PAL	Large Sump														
			2/16/06	5/30/06	8/29/06	11/15/06	2/19/08	5/21/08	3/20/09	7/8/09	10/5/11	2/28/13	3/1/13				
VOCs² (µg/l)																	
cis-1,2-Dichloroethylene	70	7.0	1.46	1.67	2.35	2.37	2.5	3.3	--	--	<u>17</u>	<u>17</u>	--				
trans-1,2-Dichloroethylene	100	20	<0.1	0.14	<0.1	<0.1	<0.50	<0.50	--	--	<0.50	<0.25	--				
1,2-Dichloropropane	5.0	0.5	<0.1	<0.1	<0.1	<0.1	<0.50	<0.50	--	--	<0.50	<0.20	--				
1,3-Dichloropropane	NSE	NSE	<0.1	<0.1	<0.1	<0.1	<0.25	<0.25	--	--	<0.25	<0.13	--				
2,2-Dichloropropane	NSE	NSE	<0.1	<0.1	<0.1	<0.1	<0.50	<0.50	--	--	<0.50	<0.32	--				
1,1-Dichloropropene	NSE	NSE	<0.2	<0.3	<0.3	<0.3	<0.50	<0.50	--	--	<0.50	<0.34	--				
cis-1,3-Dichloropropene	0.2	0.02	<0.1	<0.1	<0.1	<0.1	<0.20	<0.20	--	--	<0.20	<0.18	--				
trans-1,3-Dichloropropene	0.2	0.0	<0.1	<0.1	<0.1	<0.1	<0.20	<0.20	--	--	<0.20	<0.21	--				
Ethylbenzene	700	140	<0.1	<0.1	<0.1	<0.1	<0.50	<0.50	--	--	<0.50	<0.13	--				
Hexachlorobutadiene	NSE	NSE	<1.00	<1.00	<1.00	<1.00	<0.50	<0.50	--	--	<0.50	<0.26	--				
Isopropylbenzene	NSE	NSE	<0.1	<0.1	<0.1	<0.1	<0.20	<0.20	--	--	<0.20	<0.14	--				
Isopropyl Ether	NSE	NSE	--	--	--	--	<0.50	<0.50	--	--	<0.50	<0.15	--				
p-Isopropyltoluene	NSE	NSE	<0.2	<0.2	<0.2	<0.2	<0.20	<0.20	--	--	<0.20	<0.17	--				
Methyl tert Butyl Ether	60	12	<0.1	1.01	<0.1	0.14	<0.50	<0.50	--	--	<0.50	<0.24	--				
Methylene Chloride	5.0	0.5	<0.4	<0.4	<0.4	<0.4	<1.0	<1.0	--	--	<1.0	<0.68	--				
Naphthalene	40	8.0	<1.00	<1.00	<1.00	<1.00	<0.25	<0.25	--	--	0.26	<0.16	--				
n-Propylbenzene	NSE	NSE	<0.1	<0.1	<0.1	<0.1	<0.50	<0.50	--	--	<0.50	<0.13	--				
Tetrachloroethylene	5.0	0.5	<0.1	<0.1	0.17	0.27	<0.50	<u>0.87</u>	<0.50	<0.050	<u>7.4</u>	<u>3.6</u>	--				
1,1,1,2-Tetrachloroethane	70	7.0	<0.1	<0.1	<0.1	<0.1	<0.25	<0.25	--	--	<0.25	<0.25	--				
1,1,1,2,2-Tetrachloroethane	0.2	0.02	<0.1	<0.1	<0.1	<0.1	<0.20	<0.20	--	--	<0.20	<0.23	--				
Toluene	1,000	200	<0.4	<0.4	0.5	<0.4	<0.20	<0.20	--	--	<0.50	<0.11	--				
1,1,2-Trichloroethane	5.0	0.5	--	<0.1	<0.1	<0.1	<0.25	<0.25	--	--	<0.25	<0.28	--				
Total Trimethylbenzenes	480	96.0	<0.3	<0.3	<0.3	<0.3	<0.40	<0.40	--	--	--	<0.18	--				
1,2,3-Trichlorobenzene	NSE	NSE	<0.5	<0.5	<0.5	<0.5	<0.25	<0.25	--	--	<0.25	<0.24	--				
1,2,4-Trichlorobenzene	70.0	14	<0.5	<0.5	<0.5	<0.5	<0.25	<0.25	--	--	<0.25	<0.31	--				
1,1,1-Trichloroethane	200	40.0	<0.2	<0.2	<0.2	<0.2	<0.50	<0.50	--	--	<0.50	<0.20	--				
Trichloroethylene	5.0	0.5	<u>0.645</u>	<u>0.95</u>	<u>1.97</u>	<u>2.11</u>	<u>1.9</u>	<u>4.6</u>	<u>2.3</u>	<0.050	<u>11</u>	<u>4.5</u>	--				
Trichlorofluoromethane	NSE	NSE	<0.2	<0.2	<0.2	<0.2	<0.50	<0.50	--	--	<0.50	<0.19	--				
Vinyl Chloride	0.2	0.02	<0.15	<0.15	<0.15	<0.15	<0.20	<0.20	<0.20	<0.032	<0.20	<0.10	--				
Total Xylenes	10,000	1,000	<0.5	<0.5	0.11	<0.5	<0.50	<0.50	--	--	<0.50	<0.068	--				
Metals (µg/l)																	
Arsenic	50	5.0	2.0	--	--	--	--	--	--	--	--	--	--				
Barium	2000	400	56	--	--	--	--	--	--	--	--	--	--				
Cadmium	5.0	0.5	<0.2	--	--	--	--	--	--	--	--	--	--				
Chromium	100	10	<1.60	--	--	--	--	--	--	--	--	--	--				
Lead	15	1.5	<0.5	--	--	--	--	--	--	--	--	--	--				
Mercury	2.0	0.2	<0.07	--	--	--	--	--	--	--	--	--	--				
Selenium	50	10	0.9	--	--	--	--	--	--	--	--	--	--				
Silver	50	10	<0.2	--	--	--	--	--	--	--	--	--	--				

NSE = No standard established

-- = No data or not analyzed for

Bold = Exceeds ch. NR 140 Enforcement Standard (ES)

Underline = Exceeds ch. NR 140 Preventive Action Limit (PAL)

¹ = PAHs is the acronym for polynuclear aromatic hydrocarbons

² = VOCs is the acronym for volatile organic compounds

Compiled by: JEG Checked by: FJM 2013 data Compiled by: JJB Checked by: BTT

SOURCE:
SEH, 2019. Comprehensive Site Investigation Report
NOTE: WDNR Regulatory criteria is not current.

Analytical Parameters	NR 140 Standards		Well No./Sampling Date																			
			LMW-8				LMW-9				LMW-10				LPZ-3				LPZ-4			
	ES	PAL	3/20/09	7/8/09	11/4/11	3/1/13	3/19/09	7/8/09	11/4/11	3/1/13	3/19/09	7/8/09	11/4/11	3/1/13	3/19/09	7/8/09	11/4/11	3/1/13	3/19/09	7/8/09	11/4/11	3/1/13
Elevation Data																						
Top of PVC	--	--	854.18	854.18	854.18	854.18	853.92	853.92	853.92	853.92	853.48	853.48	853.48	853.48	853.69	853.69	853.69	853.69	853.59	853.59	853.59	853.59
Screen Length	--	--																				
Top of Screen	--	--	854.18	854.18	854.18	854.18	853.92	853.92	853.92	853.92	853.48	853.48	853.48	853.48	853.69	853.69	853.69	853.69	853.59	853.59	853.59	853.59
DTB	--	--																				
Bottom of Screen	--	--	854.18	854.18	854.18	854.18	853.92	853.92	853.92	853.92	853.48	853.48	853.48	853.48	853.69	853.69	853.69	853.69	853.59	853.59	853.59	853.59
DTW	--	--			8.70																8.75	
Groundwater	--	--	854.18	854.18	845.48	845.48	853.92	853.92	846.25	846.25	853.48	853.48	845.14	845.14	853.69	853.69	845.15	845.15	853.59	853.59	844.84	844.84

SOURCE:
SEH, 2019. Comprehensive Site Investigation Report
NOTE: WDNR Regulatory criteria is not current.

Table 6
Former Mirro Plant #20 - Chilton, Wisconsin
Groundwater Analytical Results: Volatile Organic Compounds (VOC)
 All contaminants shown in µg/L

Sample ID	Sample Date	Benzene	Ethyl benzene	MTBE	Toluene	1,2,4 TMB	1,3,5 TMB	Xylenes	s-Butyl Benzene	1,2 DCA	cis-1,2 DCE	TCE
MW-1	11/19/02	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
MW-2	11/19/02	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
MW-3	11/19/02	ND	ND	ND	ND	4.4	ND	ND	0.75 ^Q	1.4^Q	2.0 ^Q	0.94^Q
MW-4	11/19/02	ND	ND	ND	ND	ND	ND	ND	ND	ND	2.0 ^Q	ND
Preventative Action Limit		0.5	140	12	200	96		1,000		0.5		0.5
Enforcement Standard		5	700	60	1,000	480		10,000	---	5	---	5
ND = Not Detected µg/L = micrograms per liter Q = Analyte detected between LOD and LOQ Bold & Outlined = exceeds PAL Italics & Outlined = exceeds ES - - - = Not Established												

January 2, 2003

SOURCE:
 SEH, 2019. Comprehensive Site Investigation Report
NOTE: WDNR Regulatory criteria is not current.

TABLE 7
GROUNDWATER SAMPLE ANALYTICAL RESULTS - POLYNUCLEAR AROMATIC HYDROCARBONS (PAH)
 Former Miro Plant #20 - Chilton, Wisconsin
 All contaminants shown in $\mu\text{g/l}$

Sample ID	Sample Date	Acenaphthene	Acenaphthylene	Anthracene	Benzo(a)anthracene	Benzo(a)pyrene	Benzo(b)fluoranthene	Benzo(g,h,i)perylene	Benzo(k)fluoranthene	Fluoranthene	Fluorene	1-Methylnaphthalene	2-Methylnaphthalene	Naphthalene	Phenanthrene	Pyrene	
MW-1	11/19/02	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
MW-2	11/19/02	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
MW-3	11/19/02	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.046 ^Q	ND	0.067 ^Q	ND	ND	
MW-4	11/19/02	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
Preventive Action Limit		---	---	600	---	0.02	0.02	---	---	80	80	---	---	8	---	50	
Enforcement Standard		---	---	3,000	---	0.2	0.2	---	---	400	400	---	---	40	---	250	
Q = Analyte detected between LOD and LOQ				$\mu\text{g/l}$ = Micrograms per liter		Bold & Outlined = Concentration above PAL		ND = Not Detected									
Italics & Outlined = Concentration above ES				--- = Not Established													

February 17, 2003

SOURCE:
 SEH, 2019. Comprehensive Site Investigation Report
NOTE: WDNR Regulatory criteria is not current.

**Table 2
Soil Analytical Results - Site Investigation**

Analytical Parameters	Generic RCLs ¹ based on direct contact ²	Generic RCLs ¹ based on protection of groundwater ³	Boring No./Depth (ft)/Date										
			B-1		B-2		B-3		B-4	B-5	B-6	B-7	B-8
			0-2	4-6	0-2	2-4	0-2	2-4	4-6	0.5-0.8	1.5-3.0	1.0-2.5	1.0-2.5
			2/13/06	2/13/06	2/13/06	2/13/06	2/13/06	2/13/06	2/14/06	2/14/06	2/14/06	2/14/06	2/14/06
DRO (mg/kg)	NSE	100	--	--	--	--	--	--	--	<6.77	--	--	--
pH	NSE	NSE	8.16	9.03	--	--	--	--	--	8.95	7.58	9.51	8.16
PAHs (mg/kg)													
Acenaphthene	60,000	38	<0.0055	<0.00523	<0.00522	<0.00596	<0.00545	<0.00597	<0.00636	<0.00576	<0.00626	<0.00529	<0.00585
Acenaphthylene	360	0.7	<0.00773	<0.00735	<0.00733	<0.00837	<0.00766	<0.00839	<0.00893	<0.00809	<0.00879	<0.00743	<0.00821
Anthracene	300,000	3,000	<0.00246	<0.00234	<0.00233	<0.00266	<0.00244	<0.00267	<0.00284	<0.00257	<0.0028	<0.00236	<0.00261
Benzo(a)Anthracene	3.9	17	<0.0048	0.00571	0.0362	<0.0052	0.0646	<0.00521	0.00861	<0.00502	<0.00546	<0.00462	<0.0051
Benzo(a)Pyrene	0.39	48	<0.00269	0.0106	0.0477	<0.00292	0.0821	<0.00292	<0.00311	<0.00282	<0.00306	<0.00259	<0.00286
Benzo(b)Fluoranthene	3.9	360	<0.00246	0.0092	0.084	0.011	0.196	<0.00267	<0.00284	<0.00257	<0.0028	<0.00236	<0.00261
Benzo(k)Fluoranthene	39	870	<0.0034	0.00453	0.0412	<0.00368	0.0893	<0.00368	<0.00392	<0.00355	<0.00386	<0.00327	<0.00361
Benzo(ghi)Perylene	39	6,800	<0.00468	0.0154	0.068	0.0214	0.198	<0.00508	0.0132	<0.0049	<0.00533	<0.0045	<0.00498
Chrysene	390	37	<0.00269	0.00978	0.107	0.0137	0.19	<0.00292	<0.00311	0.00452	<0.00306	<0.00259	<0.00286
Dibenzo(a,h)Anthracene	0.39	38	<0.00316	<0.00301	<0.003	<0.00342	<0.00313	<0.00343	<0.00365	0.00875	<0.0036	<0.00304	<0.00336
Fluoranthene	40,000	500	<0.00304	0.0196	0.306	0.0224	0.535	<0.0033	0.03	<0.00319	<0.00346	<0.00293	<0.00323
Fluorene	40,000	100	<0.00386	<0.00367	<0.00367	<0.00418	<0.00383	<0.00419	<0.00447	<0.00404	<0.00439	<0.00372	<0.0041
Indeno(1,2,3-cd)Pyrene	3.9	680	0.021	0.00823	0.04	0.00744	0.137	<0.0028	0.00802	<0.0027	<0.00293	<0.00248	0.006
1-Methyl Naphthalene	70,000	23	0.0326	<0.00412	0.0938	0.00515	0.0883	0.0428	<0.00501	<0.00453	<0.00493	<0.00417	0.0831
2-Methyl Naphthalene	40,000	20	0.0708	<0.00457	<0.00456	0.00875	<0.00476	<0.00521	<0.00555	<0.00502	<0.00546	<0.00462	0.0271
Naphthalene	110	0.4	0.0177	<0.00512	0.0493	<0.00583	0.059	<0.00584	<0.00622	<0.00564	<0.00613	<0.00518	0.099
Phenanthrene	390	1.8	<0.0048	0.00859	0.206	0.0128	0.238	<0.00521	0.0161	<0.00502	<0.00546	<0.00462	<0.0051
Pyrene	30,000	8,700	<0.00246	0.00506	<0.00233	<0.00266	0.0404	<0.00267	0.00537	<0.00257	<0.0028	<0.00236	<0.00261
VOCs (mg/kg)													
Benzene	NSE	0.0055	<0.025	<0.025	<0.025	<0.025	0.0905	<0.025	<0.025	<0.025	<0.025	<0.5	<2.50
Bromobenzene	NSE	NSE	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.5	<2.50
Bromodichloromethane	NSE	NSE	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.5	<2.50
n-Butylbenzene	NSE	NSE	<0.025	<0.025	0.0611	<0.025	0.0568	<0.025	0.153	<0.025	<0.025	2.73	23
sec-Butylbenzene	NSE	NSE	<0.025	<0.025	0.0889	<0.025	0.0638	<0.025	<0.025	<0.025	<0.025	<0.5	<2.50
tert-Butylbenzene	NSE	NSE	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.5	<2.50
Carbon Tetrachloride	NSE	NSE	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.5	<2.50
Chlorobenzene	NSE	NSE	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.5	<2.50
Chlorodibromomethane	NSE	NSE	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.5	<2.50
Chloroethane	NSE	NSE	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.5	<2.50
Chloroform	NSE	NSE	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.5	<2.50
Chloromethane	NSE	NSE	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.5	<2.50
o-Chlorotoluene	NSE	NSE	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.5	<2.50
p-Chlorotoluene	NSE	NSE	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.5	<2.50
1,2-Dibromo-3-chloropropane	NSE	NSE	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.5	<2.50
1,2-Dibromoethane	NSE	NSE	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.5	<2.50
1,2-Dichlorobenzene	NSE	NSE	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.5	<2.50
1,3-Dichlorobenzene	NSE	NSE	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.5	<2.50
1,4-Dichlorobenzene	NSE	NSE	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.5	<2.50
Dichlorodifluoromethane	NSE	NSE	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.5	<2.50
1,1-Dichloroethane	NSE	NSE	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.5	<2.50
1,2-Dichloroethane	NSE	0.0049	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.5	<2.50
1,1-Dichloroethylene	NSE	NSE	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.5	<2.50
cis-1,2-Dichloroethylene	NSE	NSE	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.5	<2.50
trans-1,2-Dichloroethylene	NSE	NSE	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.5	<2.50

SOURCE:
SEH, 2019. Comprehensive Site Investigation Report
NOTE: WDNR Regulatory criteria is not current.

Table 2 (Continued)
Soil Analytical Results - Site Investigation

Analytical Parameters	Generic RCLs ¹ based on direct contact ²	Generic RCLs ¹ based on protection of groundwater ³	Boring No./Depth (ft)/Date										
			B-1		B-2		B-3		B-4	B-5	B-6	B-7	B-8
			0-2	4-6	0-2	2-4	0-2	2-4	4-6	0.5-0.8	1.5-3.0	1.0-2.5	1.0-2.5
			2/13/06	2/13/06	2/13/06	2/13/06	2/13/06	2/13/06	2/14/06	2/14/06	2/14/06	2/14/06	2/14/06
VOCs (mg/kg)													
1,2-Dichloropropane	NSE	NSE	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.5	<2.50
1,3-Dichloropropane	NSE	NSE	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.5	<2.50
2,2-Dichloropropane	NSE	NSE	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.5	<2.50
Ethylbenzene	NSE	2.9	<0.025	<0.025	0.0689	<0.025	0.109	<0.025	0.0419	<0.025	<0.025	<0.5	<2.50
Hexachlorobutadiene	NSE	NSE	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.5	<2.50
Isopropylbenzene	NSE	NSE	<0.025	<0.025	0.0533	<0.025	0.087	<0.025	<0.025	<0.025	<0.025	<0.5	<2.50
Isopropyl Ether	NSE	NSE	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.5	<2.50
p-Isopropyltoluene	NSE	NSE	<0.025	<0.025	0.0533	<0.025	0.0719	<0.025	<0.025	<0.025	<0.025	<0.5	<2.50
Methyl tert Butyl Ether	NSE	NSE	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.5	<2.50
Methylene Chloride	NSE	NSE	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.5	<2.50
Naphthalene	110	0.4	0.0455	<0.025	0.317	<0.025	0.365	0.0445	0.0419	<0.025	<0.025	<0.5	3.69
n-Propylbenzene	NSE	NSE	<0.025	<0.025	0.0633	<0.025	0.0858	<0.025	<0.025	<0.025	<0.025	<0.5	<2.50
Tetrachloroethylene	NSE	NSE	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.5	<2.50
Toluene	NSE	1.5	<0.025	<0.025	<0.025	<0.025	0.448	0.0394	0.046	<0.025	<0.025	0.822	<2.50
1,2,3-Trichlorobenzene	NSE	NSE	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.5	<2.50
1,2,4-Trichlorobenzene	NSE	NSE	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.5	<2.50
1,1,1-Trichloroethane	NSE	NSE	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.5	<2.50
1,1,2-Trichloroethane	NSE	NSE	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.5	<2.50
Trichloroethylene	NSE	NSE	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.5	<2.50
Trichlorofluoromethane	NSE	NSE	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.5	<2.50
1,2,4-Trimethylbenzene	NSE	NSE	<0.025	<0.025	0.221	<0.025	0.367	<0.025	0.237	<0.025	<0.025	<0.5	91.9
1,3,5-Trimethylbenzene	NSE	NSE	<0.025	<0.025	0.09	<0.025	0.113	<0.025	0.123	<0.025	<0.025	<0.5	<2.50
Vinyl Chloride	NSE	NSE	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.5	<2.50
Total Xylenes	NSE	4.1	<0.050	<0.050	0.349	0.0393	0.768	0.1258	0.346	0.0355	0.0399	4.29	4.74
RCRA Total Metals (mg/kg)													
Arsenic	1.6	NSE	3.48	2.34	42.6	4.93	28.1	5.34	2.98	0.875	2.41	<0.383	<0.42
Barium	NSE	NSE	53.4	91	36.4	100	57.5	62.9	78.5	5.47	16.4	10.7	17.5
Cadmium	510	NSE	0.113	0.0757	0.584	<0.0722	1.08	0.266	0.253	<0.0699	0.172	<0.0642	<0.0709
Chromium	NSE	NSE	15.9	16.9	8.03	30.5	19	16	21.4	2.23	12.7	8.73	7.67
Lead	500	NSE	20.6	9.02	134	9.48	184	58.4	9.45	1.06	5.83	1.82	3.87
Mercury	NSE	NSE	0.156	0.0245	0.0978	0.0659	0.0812	0.382	0.0934	<0.0172	0.0426	<0.0158	0.0348
Selenium	NSE	NSE	<0.703	<0.668	<0.667	<0.76	<0.696	<0.762	<0.812	<0.735	2.52	<0.676	<0.746
Silver	NSE	NSE	<0.234	<0.223	<0.222	<0.253	<0.232	<0.254	<0.271	<0.245	<0.266	<0.225	<0.249

-- = Not analyzed for indicated parameter

RCL = Residual contaminant levels for soils published in ch. NR 720, Wis. Adm. Code

NSE = No Standard Established

¹ = Generic RCLs for PAH compounds are suggested only. Suggested RCLs have not been adopted into Wisconsin Administrative Code

² = RCLs based on human health risk from direct contact (ingestion of soil or inhalation of particulate matter) at industrial land use sites

³ = RCLs based on protection of groundwater represent concentrations of contaminants that can remain in soil at a site and not cause a violation of a ch. NR 140 preventive action limit in groundwater

1.94 = Concentration exceeds ch. NR 720 RCL based on protection of groundwater, or suggested RCL for PAHs

Compiled by: JEG Checked by: RJH

SOURCE:
SEH, 2019. Comprehensive Site Investigation Report
NOTE: WDNR Regulatory criteria is not current.

Table 2 (Continued)
Soil Analytical Results - Site Investigation

Analytical Parameters	Generic RCLs ¹ based on direct contact ²	Generic RCLs ¹ based on protection of groundwater ³	Boring No./Depth (ft)/Date											
			B-9	B-10	B-11	B-12	B-13	MW-5/PZ-5	MW-6	MW-7	MW-8		MW-9	
			1.0-2.0 2/14/06	0.5-1.5 2/14/06	1-3 2/15/06	1-2 2/15/06	0.5-4.5 2/15/06	0-4 2/13/06	0-4 2/13/06	0-4 2/13/06	0-4 2/13/06	4-6 2/13/06	0-4 2/13/06	4-6 2/13/06
DRO (mg/kg)	NSE	100	--	--	--	--	--	--	--	--	--	--	--	--
pH	NSE	NSE	8.51	8.31	9.53	8.87	8.14	--	--	--	--	--	--	--
PAHs (mg/kg)														
Acenaphthene	60,000	38	<0.00535	<0.00643	<0.00575	<0.00517	<0.00499	<0.00617	<0.0081	<0.121	<0.00544	<0.00705	<0.00554	<0.00539
Acenaphthylene	360	0.7	<0.00752	<0.00903	<0.00807	<0.00726	<0.00701	<0.00866	<0.0114	<0.17	<0.00764	<0.0099	<0.00778	<0.00757
Anthracene	300,000	3,000	<0.00239	<0.00287	<0.00257	<0.00231	<0.00223	<0.00276	<0.00362	0.275	<0.00243	<0.00315	<0.00248	<0.00241
Benzo(a)Anthracene	3.9	17	0.0166	0.0166	<0.00501	<0.00451	0.00485	<0.00538	0.0519	0.988	0.0122	<0.00615	0.0323	0.00823
Benzo(a)Pyrene	0.39	48	0.0175	0.0261	<0.00281	<0.00253	<0.00244	<0.00302	0.0678	0.815	<0.00266	<0.00345	0.052	0.0164
Benzo(b)Fluoranthene	3.9	360	0.0336	0.041	<0.00257	<0.00231	0.0219	<0.00276	0.114	1.01	0.0355	<0.00315	0.104	0.0292
Benzo(k)Fluoranthene	39	870	0.0231	0.0198	<0.00355	<0.00319	<0.00308	<0.00381	0.0391	0.537	0.0208	<0.00435	0.0459	0.0122
Benzo(ghi)Perylene	39	6,800	<0.00456	0.0328	<0.00489	<0.0044	0.092	<0.00525	0.106	0.471	<0.00463	<0.006	0.151	0.0509
Chrysene	390	37	0.033	0.0472	0.00528	0.00949	<0.00244	0.0056	0.084	1.09	0.0543	<0.00345	0.109	0.0292
Dibenzo(a,h)Anthracene	0.39	38	<0.00308	0.00911	<0.0033	<0.00297	<0.00287	<0.00354	<0.00466	<0.0695	<0.00313	<0.00405	<0.00318	<0.0031
Fluoranthene	40,000	500	0.12	0.087	0.00858	0.0163	<0.00276	<0.00341	0.233	3.71	<0.00301	<0.0039	0.218	0.00586
Fluorene	40,000	100	<0.00376	<0.00451	<0.00403	<0.00363	<0.00351	<0.00433	0.0155	0.136	<0.00382	<0.00495	<0.00389	<0.00378
Indeno(1,2,3-cd)Pyrene	3.9	680	<0.00251	0.0222	0.00413	0.00707	0.0242	<0.00289	0.0614	0.726	0.0251	<0.0033	0.0802	0.0239
1-Methyl Naphthalene	70,000	23	0.0116	0.0201	<0.00452	<0.00407	<0.00393	<0.00486	<0.00638	<0.0952	0.0566	<0.00555	<0.00436	0.013
2-Methyl Naphthalene	40,000	20	0.0131	0.028	<0.00501	<0.00451	<0.00436	<0.00538	<0.00707	<0.106	0.0635	<0.00615	<0.00483	0.0179
Naphthalene	110	0.4	0.00638	0.013	<0.00562	<0.00506	<0.00489	<0.00604	<0.00793	<0.118	0.0316	<0.0069	<0.00542	0.00857
Phenanthrene	390	1.8	0.0351	0.0491	<0.00501	0.00737	<0.00436	<0.00538	0.121	1.92	0.104	<0.00615	0.142	0.0347
Pyrene	30,000	8,700	0.00528	0.00763	0.00246	0.00337	0.00325	<0.00276	0.0621	1.33	<0.00243	<0.00315	<0.00248	<0.00241
VOCs (mg/kg)														
Benzene	NSE	0.0055	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025
Bromobenzene	NSE	NSE	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025
Bromodichloromethane	NSE	NSE	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025
n-Butylbenzene	NSE	NSE	0.0364	0.0739	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	0.0519	<0.025
sec-Butylbenzene	NSE	NSE	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	0.0436	<0.025
tert-Butylbenzene	NSE	NSE	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025
Carbon Tetrachloride	NSE	NSE	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025
Chlorobenzene	NSE	NSE	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025
Chlorodibromomethane	NSE	NSE	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025
Chloroethane	NSE	NSE	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025
Chloroform	NSE	NSE	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025
Chloromethane	NSE	NSE	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025
o-Chlorotoluene	NSE	NSE	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025
p-Chlorotoluene	NSE	NSE	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025
1,2-Dibromo-3-chloropropane	NSE	NSE	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025
1,2-Dibromoethane	NSE	NSE	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025
1,2-Dichlorobenzene	NSE	NSE	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025
1,3-Dichlorobenzene	NSE	NSE	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025
1,4-Dichlorobenzene	NSE	NSE	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025
Dichlorodifluoromethane	NSE	NSE	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025
1,1-Dichloroethane	NSE	NSE	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025
1,2-Dichloroethane	NSE	0.0049	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025
1,1-Dichloroethylene	NSE	NSE	<0.025	0.171	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025
cis-1,2-Dichloroethylene	NSE	NSE	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025
trans-1,2-Dichloroethylene	NSE	NSE	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025

Former Mirro Plant #20
Newell Rubbermaid

SOURCE:
SEH, 2019. Comprehensive Site Investigation Report
NOTE: WDNR Regulatory criteria is not current.

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Table 2 (Continued)
Soil Analytical Results - Site Investigation

Analytical Parameters	Generic RCLs ¹ based on direct contact ²	Generic RCLs ¹ based on protection of groundwater ³	Boring No./Depth (ft)/Date											
			B-9	B-10	B-11	B-12	B-13	MW-5/PZ-5	MW-6	MW-7	MW-8		MW-9	
			1.0-2.0 2/14/06	0.5-1.5 2/14/06	1-3 2/15/06	1-2 2/15/06	0.5-4.5 2/15/06	0-4 2/13/06	0-4 2/13/06	0-4 2/13/06	0-4 2/13/06	4-6 2/13/06	0-4 2/13/06	4-6 2/13/06
VOCs (mg/kg)														
1,2-Dichloropropane	NSE	NSE	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025
1,3-Dichloropropane	NSE	NSE	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025
2,2-Dichloropropane	NSE	NSE	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025
Ethylbenzene	NSE	2.9	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	0.154	<0.025
Hexachlorobutadiene	NSE	NSE	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025
Isopropylbenzene	NSE	NSE	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	0.0696	<0.025
Isopropyl Ether	NSE	NSE	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025
p-Isopropyltoluene	NSE	NSE	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	0.0578	<0.025
Methyl tert Butyl Ether	NSE	NSE	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025
Methylene Chloride	NSE	NSE	0.174	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025
Naphthalene	110	0.4	0.0353	0.0766	<0.025	<0.025	<0.025	<0.025	<0.025	0.045	<0.025	<0.025	0.307	<0.025
n-Propylbenzene	NSE	NSE	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	0.0613	<0.025
Tetrachloroethylene	NSE	NSE	<0.025	0.133	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025
Toluene	NSE	1.5	0.0342	0.0465	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025
1,2,3-Trichlorobenzene	NSE	NSE	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025
1,2,4-Trichlorobenzene	NSE	NSE	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025
1,1,1-Trichloroethane	NSE	NSE	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025
1,1,2-Trichloroethane	NSE	NSE	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025
Trichloroethylene	NSE	NSE	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025
Trichlorofluoromethane	NSE	NSE	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025
1,2,4-Trimethylbenzene	NSE	NSE	0.082	0.0547	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	0.217	<0.025
1,3,5-Trimethylbenzene	NSE	NSE	<0.025	0.0438	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	0.126	<0.025
Vinyl Chloride	NSE	NSE	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025
Total Xylenes	NSE	4.1	0.0501	0.2052	0.033	0.0286	0.0276	<0.050	<0.050	<0.050	<0.050	<0.050	0.1062	<0.050
RCRA Total Metals (mg/kg)														
Arsenic	1.6	NSE	2.02	1.94	0.531	1.45	1.47	2.57	2.59	2.43	3.38	2.29	3.84	2.82
Barium	NSE	NSE	17	39.5	18.9	15.1	21.1	98	75.3	70.4	47.1	105	48.1	37.5
Cadmium	510	NSE	0.0925	<0.078	<0.0697	0.155	<0.0606	0.189	<0.0983	0.13	0.288	0.804	0.297	<0.0654
Chromium	NSE	NSE	31.7	6.63	5.93	5.98	7.46	27.7	17.6	15.1	6.32	41.8	11.6	11.3
Lead	500	NSE	4.11	26.3	5.21	5.47	2.71	6.56	7.29	14.5	43.8	9.54	50.8	10.4
Mercury	NSE	NSE	0.0934	0.0684	0.0318	<0.0154	0.0489	0.0669	0.119	0.0849	0.16	0.078	0.0825	0.0264
Selenium	NSE	NSE	<0.683	<0.821	<0.733	<0.66	<0.638	<0.787	<1.03	1.08	<0.694	<0.9	<0.708	<0.688
Silver	NSE	NSE	<0.228	0.33	<0.244	<0.22	<0.213	<0.262	<0.345	<0.257	<0.231	<0.3	<0.236	<0.229

-- = Not analyzed for indicated parameter

RCL = Residual contaminant levels for soils published in ch. NR 720, Wis. Adm. Code

NSE = No Standard Established

¹ = Generic RCLs for PAH compounds are suggested only. Suggested RCLs have not been adopted into Wisconsin Administrative Code

² = RCLs based on human health risk from direct contact (ingestion of soil or inhalation of particulate matter) at industrial land use sites

³ = RCLs based on protection of groundwater represent concentrations of contaminants that can remain in soil at a site and not cause a violation of a ch. NR 140 preventive action limit in groundwater

1.94 = Concentration exceeds ch. NR 720 RCL based on protection of groundwater, or suggested RCL for PAHs

Compiled by: JEG Checked by: RJH

SOURCE:
SEH, 2019. Comprehensive Site Investigation Report
NOTE: WDNR Regulatory criteria is not current.

Table 2 (Continued)
Soil Analytical Results - Site Investigation

Analytical Parameters	Generic RCLs ¹ based on direct contact ²	Generic RCLs ¹ based on protection of groundwater ³	Boring No./Depth (ft)/Date														
			PZ-9	PZ-10	10'S + 5'E of MW-3	10'S + 5'W of MW-3	10'N + 5'E of MW-3	10'N + 5'W of MW-3	10'S + 5'E of SB-4		10'S + 5'W of SB-4		10'N + 5'E of SB-4		10'N + 5'W of SB-4		
			4-6	2-4	0-2	0-2	0-2	0-2	0-2	2-4	0-2	0-2	2-4	0-2	2-4	0-2	2-4
			2/7/08	2/6/08	2/7/08	2/7/08	2/7/08	2/7/08	2/7/08	2/7/08	2/7/08	2/7/08	2/7/08	2/7/08	2/7/08	2/7/08	2/7/08
DRO (mg/kg)	NSE	100	--	--	--	--	--	--	--	--	--	--	--	--	--		
pH	NSE	NSE	--	--	--	--	--	--	--	--	--	--	--	--	--		
Semi VOCs (mg/kg)																	
Acenaphthene	60,000	38	<0.400	<0.401	--	--	--	--	--	--	--	--	--	--	--		
Acenaphthylene	360	0.7	<0.400	<0.401	--	--	--	--	--	--	--	--	--	--	--		
Anthracene	300,000	3,000	<0.400	<0.401	--	--	--	--	--	--	--	--	--	--	--		
Benzdine	NSE	NSE	<4.00	<4.01	--	--	--	--	--	--	--	--	--	--	--		
Benzo(a)Anthracene	3.9	17	<0.400	<0.401	--	--	--	--	--	--	--	--	--	--	--		
Benzo(b)Fluoranthene	3.9	360	<0.400	<0.401	--	--	--	--	--	--	--	--	--	--	--		
Benzo(k)Fluoranthene	39	870	<0.400	<0.401	--	--	--	--	--	--	--	--	--	--	--		
Benzo(a)Pyrene	0.39	48	<0.400	<0.401	--	--	--	--	--	--	--	--	--	--	--		
Benzo(ghi)Perylene	39	6,800	<0.400	<0.401	--	--	--	--	--	--	--	--	--	--	--		
Benzyl alcohol	NSE	NSE	<0.400	<0.401	--	--	--	--	--	--	--	--	--	--	--		
Butyl benzyl phthalate	NSE	NSE	<0.400	<0.401	--	--	--	--	--	--	--	--	--	--	--		
Bis(2-chloroethyl)ether	NSE	NSE	<0.400	<0.401	--	--	--	--	--	--	--	--	--	--	--		
Bis(2-chloroethoxy)methane	NSE	NSE	<0.400	<0.401	--	--	--	--	--	--	--	--	--	--	--		
Bis(2-ethylhexyl)phthalate	NSE	NSE	<0.400	<0.401	--	--	--	--	--	--	--	--	--	--	--		
Bis(2-chloroisopropyl) ether	NSE	NSE	<0.400	<0.401	--	--	--	--	--	--	--	--	--	--	--		
4-Bromophenyl phenyl ether	NSE	NSE	<0.400	<0.401	--	--	--	--	--	--	--	--	--	--	--		
Carbazole	NSE	NSE	<0.400	<0.401	--	--	--	--	--	--	--	--	--	--	--		
4-Chloroaniline	NSE	NSE	<0.400	<0.401	--	--	--	--	--	--	--	--	--	--	--		
2-Chloronaphthalene	NSE	NSE	<0.400	<0.401	--	--	--	--	--	--	--	--	--	--	--		
4-Chlorophenyl phenyl ether	NSE	NSE	<0.400	<0.401	--	--	--	--	--	--	--	--	--	--	--		
Chrysene	390	37	<0.400	<0.401	--	--	--	--	--	--	--	--	--	--	--		
Dibenzo(a,h)Anthracene	0.39	38	<0.400	<0.401	--	--	--	--	--	--	--	--	--	--	--		
Dibenzofuran	NSE	NSE	<0.400	<0.401	--	--	--	--	--	--	--	--	--	--	--		
Di-n-butyl phthalate	NSE	NSE	<0.400	<0.401	--	--	--	--	--	--	--	--	--	--	--		
1,2-Dichlorobenzene	NSE	NSE	<0.400	<0.401	--	--	--	--	--	--	--	--	--	--	--		
1,3-Dichlorobenzene	NSE	NSE	<0.400	<0.401	--	--	--	--	--	--	--	--	--	--	--		
1,4-Dichlorobenzene	NSE	NSE	<0.400	<0.401	--	--	--	--	--	--	--	--	--	--	--		
3,3-Dichlorobenzidine	NSE	NSE	<0.400	<0.401	--	--	--	--	--	--	--	--	--	--	--		
Diethyl phthalate	NSE	NSE	<0.400	<0.401	--	--	--	--	--	--	--	--	--	--	--		
Dimethyl phthalate	NSE	NSE	<0.400	<0.401	--	--	--	--	--	--	--	--	--	--	--		
2,4-Dinitrotoluene	NSE	NSE	<0.400	<0.401	--	--	--	--	--	--	--	--	--	--	--		
2,6-Dinitrotoluene	NSE	NSE	<0.400	<0.401	--	--	--	--	--	--	--	--	--	--	--		
Di-n-octyl phthalate	NSE	NSE	<0.400	<0.401	--	--	--	--	--	--	--	--	--	--	--		
Fluoranthene	40,000	500	<0.400	<0.401	--	--	--	--	--	--	--	--	--	--	--		
Fluorene	40,000	100	<0.400	<0.401	--	--	--	--	--	--	--	--	--	--	--		
Hexachlorobenzene	NSE	NSE	<0.400	<0.401	--	--	--	--	--	--	--	--	--	--	--		
Hexachlorobutadiene	NSE	NSE	<0.400	<0.401	--	--	--	--	--	--	--	--	--	--	--		
Hexachlorocyclopentadiene	NSE	NSE	<0.799	<0.802	--	--	--	--	--	--	--	--	--	--	--		
Hexachloroethane	NSE	NSE	<0.400	<0.401	--	--	--	--	--	--	--	--	--	--	--		
Indeno(1,2,3-cd)Pyrene	3.9	680	<0.400	<0.401	--	--	--	--	--	--	--	--	--	--	--		
Isophorone	NSE	NSE	<0.400	<0.401	--	--	--	--	--	--	--	--	--	--	--		
1-Methyl Naphthalene	70,000	23	<0.400	<0.401	--	--	--	--	--	--	--	--	--	--	--		
Naphthalene	110	0.4	<0.400	<0.401	--	--	--	--	--	--	--	--	--	--	--		

SOURCE:
SEH, 2019. Comprehensive Site Investigation Report
NOTE: WDNR Regulatory criteria is not current.

Table 2 (Continued)
Soil Analytical Results - Site Investigation

Analytical Parameters	Generic RCLs ¹ based on direct contact ²	Generic RCLs ¹ based on protection of groundwater ³	Boring No./Depth (ft)/Date												
			PZ-9	PZ-10	10'S + 5'E of MW-3	10'S + 5'W of MW-3	10'N + 5'E of MW-3	10'N + 5'W of MW-3	10'S + 5'E of SB-4		10'S + 5'W of SB-4	10'N + 5'E of SB-4		10'N + 5'W of SB-4	
			4-6 2/7/08	2-4 2/6/08	0-2 2/7/08	0-2 2/7/08	0-2 2/7/08	0-2 2/7/08	0-2 2/7/08	2-4 2/7/08	0-2 2/7/08	0-2 2/7/08	2-4 2/7/08	0-2 2/7/08	2-4 2/7/08
Semi VOCs (mg/kg)															
2-Nitroaniline	NSE	NSE	<0.400	<0.401	--	--	--	--	--	--	--	--	--	--	--
3-Nitroaniline	NSE	NSE	<0.400	<0.401	--	--	--	--	--	--	--	--	--	--	--
4-Nitroaniline	NSE	NSE	<0.400	<0.401	--	--	--	--	--	--	--	--	--	--	--
Nitrobenzene	NSE	NSE	<0.400	<0.401	--	--	--	--	--	--	--	--	--	--	--
N-Nitrosodimethylamine	NSE	NSE	<0.400	<0.401	--	--	--	--	--	--	--	--	--	--	--
N-Nitrosodiphenylamine	NSE	NSE	<0.400	<0.401	--	--	--	--	--	--	--	--	--	--	--
N-Nitrosodi-n-propylamine	NSE	NSE	<0.400	<0.401	--	--	--	--	--	--	--	--	--	--	--
Phenanthrene	390	1.8	<0.400	<0.401	--	--	--	--	--	--	--	--	--	--	--
Pyrene	30000	8700	<0.400	<0.401	--	--	--	--	--	--	--	--	--	--	--
1,2,4-Trichlorobenzene	NSE	NSE	<0.400	<0.401	--	--	--	--	--	--	--	--	--	--	--
Benzoic acid	NSE	NSE	<0.799	<0.802	--	--	--	--	--	--	--	--	--	--	--
4-Chloro-3-methylphenol	NSE	NSE	<0.400	<0.401	--	--	--	--	--	--	--	--	--	--	--
2-Chlorophenol	NSE	NSE	<0.400	<0.401	--	--	--	--	--	--	--	--	--	--	--
Cresol(s)	NSE	NSE	<0.400	<0.401	--	--	--	--	--	--	--	--	--	--	--
2,4-Dichlorophenol	NSE	NSE	<0.400	<0.401	--	--	--	--	--	--	--	--	--	--	--
2,4-Dimethylphenol	NSE	NSE	<0.400	<0.401	--	--	--	--	--	--	--	--	--	--	--
2,4-Dinitrophenol	NSE	NSE	<0.400	<0.401	--	--	--	--	--	--	--	--	--	--	--
4,6-Dinitro-2-methylphenol	NSE	NSE	<0.400	<0.401	--	--	--	--	--	--	--	--	--	--	--
2-Methylphenol (o-Cresol)	NSE	NSE	<0.400	<0.401	--	--	--	--	--	--	--	--	--	--	--
4-Methylphenol (p-Cresol)	NSE	NSE	<0.400	<0.401	--	--	--	--	--	--	--	--	--	--	--
2-Nitrophenol	NSE	NSE	<0.400	<0.401	--	--	--	--	--	--	--	--	--	--	--
4-Nitrophenol	NSE	NSE	<0.400	<0.401	--	--	--	--	--	--	--	--	--	--	--
Pentachlorophenol	NSE	NSE	<0.400	<0.401	--	--	--	--	--	--	--	--	--	--	--
Phenol	NSE	NSE	<0.400	<0.401	--	--	--	--	--	--	--	--	--	--	--
2,4,5-Trichlorophenol	NSE	NSE	<0.400	<0.401	--	--	--	--	--	--	--	--	--	--	--
2,4,6-Trichlorophenol	NSE	NSE	<0.400	<0.401	--	--	--	--	--	--	--	--	--	--	--
VOCs (mg/kg)															
Benzene	NSE	0.0055	<0.030	<0.030	--	--	--	--	--	--	--	--	--	--	--
Bromobenzene	NSE	NSE	<0.030	<0.030	--	--	--	--	--	--	--	--	--	--	--
Bromochloromethane	NSE	NSE	<0.042	<0.042	--	--	--	--	--	--	--	--	--	--	--
Bromodichloromethane	NSE	NSE	<0.030	<0.030	--	--	--	--	--	--	--	--	--	--	--
Bromoform	NSE	NSE	<0.030	<0.030	--	--	--	--	--	--	--	--	--	--	--
Bromomethane	NSE	NSE	<0.12	<0.12	--	--	--	--	--	--	--	--	--	--	--
n-Butylbenzene	NSE	NSE	<0.030	<0.030	--	--	--	--	--	--	--	--	--	--	--
sec-Butylbenzene	NSE	NSE	<0.030	<0.030	--	--	--	--	--	--	--	--	--	--	--
tert-Butylbenzene	NSE	NSE	<0.030	<0.030	--	--	--	--	--	--	--	--	--	--	--
Carbon Tetrachloride	NSE	NSE	<0.030	<0.030	--	--	--	--	--	--	--	--	--	--	--
Chlorobenzene	NSE	NSE	<0.030	<0.030	--	--	--	--	--	--	--	--	--	--	--
Chlorodibromomethane	NSE	NSE	<0.030	<0.030	--	--	--	--	--	--	--	--	--	--	--
Chloroethane	NSE	NSE	<0.061	<0.061	--	--	--	--	--	--	--	--	--	--	--
Chloroform	NSE	NSE	<0.030	<0.030	--	--	--	--	--	--	--	--	--	--	--
Chloromethane	NSE	NSE	<0.061	<0.061	--	--	--	--	--	--	--	--	--	--	--
o-Chlorotoluene	NSE	NSE	<0.061	<0.061	--	--	--	--	--	--	--	--	--	--	--
p-Chlorotoluene	NSE	NSE	<0.030	<0.030	--	--	--	--	--	--	--	--	--	--	--
1,2-Dibromo-3-chloropropane	NSE	NSE	<0.061	<0.061	--	--	--	--	--	--	--	--	--	--	--

SOURCE:
SEH, 2019. Comprehensive Site Investigation Report
NOTE: WDNR Regulatory criteria is not current.

Table 2 (Continued)
Soil Analytical Results - Site Investigation

Analytical Parameters	Generic RCLs ¹ based on direct contact ²	Generic RCLs ¹ based on protection of groundwater ³	Boring No./Depth (ft)/Date												
			PZ-9	PZ-10	10'S + 5'E of MW-3	10'S + 5'W of MW-3	10'N + 5'E of MW-3	10'N + 5'W of MW-3	10'S + 5'E of SB-4		10'S + 5'W of SB-4	10'N + 5'E of SB-4		10'N + 5'W of SB-4	
			4-6	2-4	0-2	0-2	0-2	0-2	0-2	2-4	0-2	0-2	2-4	0-2	2-4
			2/7/08	2/6/08	2/7/08	2/7/08	2/7/08	2/7/08	2/7/08	2/7/08	2/7/08	2/7/08	2/7/08	2/7/08	2/7/08
VOCs (mg/kg)															
1,2-Dibromoethane	NSE	NSE	<0.030	<0.030	--	--	--	--	--	--	--	--	--	--	--
Dibromomethane	NSE	NSE	<0.030	<0.030	--	--	--	--	--	--	--	--	--	--	--
1,2-Dichlorobenzene	NSE	NSE	<0.030	<0.030	--	--	--	--	--	--	--	--	--	--	--
1,3-Dichlorobenzene	NSE	NSE	<0.030	<0.030	--	--	--	--	--	--	--	--	--	--	--
1,4-Dichlorobenzene	NSE	NSE	<0.030	<0.030	--	--	--	--	--	--	--	--	--	--	--
Dichlorodifluoromethane	NSE	NSE	<0.061	<0.061	--	--	--	--	--	--	--	--	--	--	--
1,1-Dichloroethane	NSE	NSE	<0.030	<0.030	--	--	--	--	--	--	--	--	--	--	--
1,2-Dichloroethane	NSE	0.0049	<0.030	<0.030	--	--	--	--	--	--	--	--	--	--	--
1,1-Dichloroethylene	NSE	NSE	<0.030	<0.030	--	--	--	--	--	--	--	--	--	--	--
cis-1,2-Dichloroethylene	NSE	NSE	<0.030	<0.030	--	--	--	--	--	--	--	--	--	--	--
trans-1,2-Dichloroethylene	NSE	NSE	<0.030	<0.030	--	--	--	--	--	--	--	--	--	--	--
1,2-Dichloropropane	NSE	NSE	<0.030	<0.030	--	--	--	--	--	--	--	--	--	--	--
1,3-Dichloropropane	NSE	NSE	<0.030	<0.030	--	--	--	--	--	--	--	--	--	--	--
2,2-Dichloropropane	NSE	NSE	<0.030	<0.030	--	--	--	--	--	--	--	--	--	--	--
1,1-Dichloropropene	NSE	NSE	<0.030	<0.030	--	--	--	--	--	--	--	--	--	--	--
cis-1,3-Dichloropropene	NSE	NSE	<0.030	<0.030	--	--	--	--	--	--	--	--	--	--	--
trans-1,3-Dichloropropene	NSE	NSE	<0.030	<0.030	--	--	--	--	--	--	--	--	--	--	--
2,3-Dichloropropene	NSE	NSE	<0.030	<0.030	--	--	--	--	--	--	--	--	--	--	--
Isopropyl Ether	NSE	NSE	<0.030	<0.030	--	--	--	--	--	--	--	--	--	--	--
Ethylbenzene	NSE	2.9	<0.030	<0.030	--	--	--	--	--	--	--	--	--	--	--
Hexachlorobutadiene	NSE	NSE	<0.043	<0.042	--	--	--	--	--	--	--	--	--	--	--
Isopropylbenzene	NSE	NSE	<0.030	<0.030	--	--	--	--	--	--	--	--	--	--	--
p-Isopropyltoluene	NSE	NSE	<0.030	<0.030	--	--	--	--	--	--	--	--	--	--	--
Methylene Chloride	NSE	NSE	<0.061	<0.061	--	--	--	--	--	--	--	--	--	--	--
Methyl tert Butyl Ether	NSE	NSE	<0.030	<0.030	--	--	--	--	--	--	--	--	--	--	--
Naphthalene	110	0.4	<0.061	0.062	--	--	--	--	--	--	--	--	--	--	--
n-Propylbenzene	NSE	NSE	<0.030	<0.030	--	--	--	--	--	--	--	--	--	--	--
Styrene	NSE	1.5	<0.030	<0.030	--	--	--	--	--	--	--	--	--	--	--
1,1,1,2-Tetrachloroethane	NSE	NSE	<0.030	<0.030	--	--	--	--	--	--	--	--	--	--	--
1,1,2,2-Tetrachloroethane	NSE	NSE	<0.030	<0.030	--	--	--	--	--	--	--	--	--	--	--
Tetrachloroethylene	NSE	NSE	<0.030	<0.030	--	--	--	--	--	--	--	--	--	--	--
Toluene	NSE	1.5	<0.030	<0.030	--	--	--	--	--	--	--	--	--	--	--
1,2,3-Trichlorobenzene	NSE	NSE	<0.030	<0.030	--	--	--	--	--	--	--	--	--	--	--
1,2,4-Trichlorobenzene	NSE	NSE	<0.030	<0.030	--	--	--	--	--	--	--	--	--	--	--
1,1,1-Trichloroethane	NSE	NSE	<0.030	<0.030	--	--	--	--	--	--	--	--	--	--	--
1,1,2-Trichloroethane	NSE	NSE	<0.043	<0.042	--	--	--	--	--	--	--	--	--	--	--
Trichloroethylene	NSE	3.7*	1.5	2.6	--	--	--	--	--	--	--	--	--	--	--
Trichlorofluoromethane	NSE	NSE	<0.030	<0.030	--	--	--	--	--	--	--	--	--	--	--
1,2,3-Trichloropropane	NSE	NSE	<0.061	<0.061	--	--	--	--	--	--	--	--	--	--	--
1,2,4-Trimethylbenzene	NSE	NSE	<0.030	0.2	--	--	--	--	--	--	--	--	--	--	--
1,3,5-Trimethylbenzene	NSE	NSE	<0.030	0.05	--	--	--	--	--	--	--	--	--	--	--
Vinyl Chloride	NSE	NSE	<0.043	<0.042	--	--	--	--	--	--	--	--	--	--	--
Total Xylenes	NSE	4.1	<0.100	<0.100	--	--	--	--	--	--	--	--	--	--	--

SOURCE:
SEH, 2019. Comprehensive Site Investigation Report
NOTE: WDNR Regulatory criteria is not current.

Table 2 (Continued)
Soil Analytical Results - Site Investigation

Analytical Parameters	Generic RCLs ¹ based on direct contact ²	Generic RCLs ¹ based on protection of groundwater ³	Boring No./Depth (ft)/Date												
			PZ-9	PZ-10	10'S + 5'E of MW-3	10'S + 5'W of MW-3	10'N + 5'E of MW-3	10'N + 5'W of MW-3	10'S + 5'E of SB-4		10'S + 5'W of SB-4	10'N + 5'E of SB-4		10'N + 5'W of SB-4	
			4-6 2/7/08	2-4 2/6/08	0-2 2/7/08	0-2 2/7/08	0-2 2/7/08	0-2 2/7/08	0-2 2/7/08	2-4 2/7/08	0-2 2/7/08	0-2 2/7/08	2-4 2/7/08	0-2 2/7/08	2-4 2/7/08
RCRA Total Metals (mg/kg)															
Arsenic	1.6	NSE	6.9	7.2	4.1	6.6	4.8	5.5	5.2	2.5	7.1	3.2	5.5	4.4	3.1
Barium	NSE	NSE	15	34	--	--	--	--	--	--	--	--	--	--	--
Cadmium	510	NSE	< 0.12	<0.12	--	--	--	--	--	--	--	--	--	--	--
Chromium	NSE	NSE	6.5	6.9	--	--	--	--	--	--	--	--	--	--	--
Lead	500	NSE	6	6.5	--	--	--	--	--	--	--	--	--	--	--
Mercury	NSE	NSE	< 0.012	0.03	--	--	--	--	--	--	--	--	--	--	--
Selenium	NSE	NSE	< 4.9	<4.8	--	--	--	--	--	--	--	--	--	--	--
Silver	NSE	NSE	< 0.13	<0.18	--	--	--	--	--	--	--	--	--	--	--

-- = Not analyzed for indicated parameter
RCL = Residual contaminant levels for soils published in ch. NR 720, Wis. Adm. Code
NSE = No Standard Established
¹ = Generic RCLs for PAH compounds are suggested only. Suggested RCLs have not been adopted into Wisconsin Administrative Code
² = RCLs based on human health risk from direct contact (ingestion of soil or inhalation of particulate matter) at industrial land use sites
³ = RCLs based on protection of groundwater represent concentrations of contaminants that can remain in soil at a site and not cause a violation of a ch. NR 140 preventive action limit in groundwater
* = Generic RCLs calculated using the U.S. EPA Soil Screening Level website and WDNR Publication RR-682 dated January 11, 2002
1.94 = Concentration exceeds ch. NR 720 RCL based on protection of groundwater, or suggested RCL for PAHs
Compiled by: JEG Checked by: RJH

SOURCE:
SEH, 2019. Comprehensive Site Investigation Report
NOTE: WDNR Regulatory criteria is not current.

Table 2 (Continued)
Soil Analytical Results - Pesticides and PCBs

Analytical Parameters	Boring No./Depth (ft)/Date				
	B-1	B-1	B-10	Transformer Pad	
	0-2	4-6	0.5-1.5	0-0.5	0.5-1.5
	2/13/06	2/13/06	2/14/06		
Pesticides (µg/kg)					
Alachlor	<2.28	<2.17	--	--	--
Atrazine	<2.18	<2.07	--	--	--
Butylate	<1.14	<1.08	--	--	--
Chlorpyrifos	<1.76	<1.67	--	--	--
Cyanazine	<2.25	<2.14	--	--	--
Desethyl atrazine	<2.32	<2.20	--	--	--
Desisopropyl atrazine	<3.51	<3.34	--	--	--
EPTC (Eptam)	<6.44	<6.12	--	--	--
Metolachlor	<2.42	<2.31	--	--	--
Metribuzin	<2.59	<2.46	--	--	--
Pendimethalin	<2.08	<1.98	--	--	--
Prometon	<3.27	<3.11	--	--	--
Propazine	<2.12	<2.02	--	--	--
Simazine	<2.05	<1.95	--	--	--
Trifluralin	<2.07	<1.97	--	--	--
Acetochlor	<5.85	<5.57	--	--	--
Dimethenamid	<3.86	<3.67	--	--	--
PCBs (µg/kg)					
Arochlor 1016	--	--	<6.4	<0.0672	<0.0667
Arochlor 1221	--	--	<5.3	<0.0672	<0.0667
Arochlor 1232	--	--	<5.2	<0.0672	<0.0667
Arochlor 1242	--	--	<5.6	<0.0672	<0.0667
Arochlor 1248	--	--	<4.1	<0.0672	<0.0667
Arochlor 1254	--	--	18	<0.0672	<0.0667
Arochlor 1260	--	--	<3.8	<0.0672	<0.0667
Arochlor 1268	--	--	--	<0.0672	<0.0667
-- = Not analyzed for					
Compiled by: <u>JEG</u> Checked by: <u>RJH</u>					

SOURCE:
SEH, 2019. Comprehensive Site Investigation Report
NOTE: WDNR Regulatory criteria is not current.

TABLE 1
SOIL SAMPLE ANALYTICAL RESULTS - VOLATILE ORGANIC COMPOUNDS (VOC)
 NEWELL RUBBERMAID - MIRRO PLANT #20
 CHILTON, WISCONSIN
 All Contaminants Shown in mg/kg - Only Contaminants With Detects Shown

Sample ID	Sample Date	Feet (bgs)	Benzene	tert-Butyl benzene	sec-Butyl benzene	n-Butyl benzene	1,2-DCA	1,1-DCA	1,1-DCE	cis-1,2-DCE	trans-1,2-DCE	Ethyl benzene	Isopropyl benzene	p-Isopropyl toluene	DB CM	Methylene chloride	Naphthalene	n-Propyl benzene	1,1,2,2-Tetrachloroethane	Toluene	1,1,1-TCA	PCE	1,2,4-TMB	1,3,5-TMB	Chloro methane	Vinyl Chloride	Xylenes	
SB-1	07/15/02	0-4	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
SB-2	07/15/02	0-4	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.057
SB-3	07/15/02	0-4	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.070	ND	ND	ND	ND	ND	ND	ND	0.034	ND	ND	ND	ND	ND	0.059
SB-4	07/15/02	0-4	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.160	ND	ND	ND	ND	ND	0.025 ^J	ND	0.15	ND	ND	0.095	0.061	ND	ND	ND	1.970
SB-4	07/15/02	4-7	ND	0.046	0.410	0.083	ND	ND	ND	ND	ND	0.076	2.700	0.200	0.25	ND	0.061	2.000	ND	ND	ND	ND	3.900	ND	ND	ND	0.800	
SB-4	07/15/02	8-12	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.120	ND	ND	ND	ND	0.066	ND	0.025 ^J	ND	ND	0.130	ND	ND	ND	0.184	
SB-6	07/15/02	6-7	ND	ND	0.140	0.060	ND	ND	ND	ND	ND	0.051	0.250	0.170	ND	ND	ND	0.200	ND	ND	ND	ND	0.460	ND	ND	ND	0.220	
SB-7	07/15/02	6-7	ND	ND	0.180	0.130	ND	ND	ND	ND	ND	ND	0.063	ND	ND	ND	ND	0.100	ND	ND	ND	ND	0.170	ND	ND	ND	ND	
SB-7	07/15/02	10-11	ND	ND	0.086	0.074	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.045	ND	ND	ND	ND	0.056	ND	ND	ND	ND	
SB-8	07/15/02	6-7	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
SB-8	07/15/02	11-12	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
SB-9	07/15/02	7-8	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
SB-10	07/15/02	5-6	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
SB-11	07/15/02	6-7	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
SB-12	07/15/02	5-8	ND	0.090	0.570	0.790	ND	ND	ND	ND	ND	ND	0.150	0.130	ND	ND	0.089	0.350	ND	ND	ND	ND	4.100	0.094	ND	ND	ND	
Residual Contaminant Levels		0.0055	-	-	-	-	0.0049	-	-	-	-	2.9	-	-	-	-	0.4†	-	-	1.5	-	-	-	-	-	-	-	4.1

ND = Not Detected mg/kg = milligrams per kilogram † = recommended RCL shaded = exceeds RCL TMB = Trimethylbenzene DBCM = Dibromochloromethane
 DCE = Dichloroethene DCA = Dichloroethane TCA = Trichloroethane PCE = Tetrachloroethene J = Analyte detected between LOD and LOQ

August 11, 2002

SOURCE:
 SEH, 2019. Comprehensive Site Investigation Report
 NOTE: WDNR Regulatory criteria is not current.

Table 2
SOIL SAMPLE ANALYTICAL RESULTS
POLYAROMATIC HYDROCARBONS (PAH)
NEWELL RUBBERMAID - MIRRO PLANT #20
CHILTON, WISCONSIN
All Contaminants Shown In (mg/kg)

Sample ID	SB-1 0' - 4' 07/15/02	SB-6 6' - 7' 07/15/02	SB-7 6' - 7' 07/15/02	Suggested Generic RCL (1)
Acenaphthene	ND	ND	ND	38
Acenaphthylene	ND	ND	ND	0.7
Anthracene	ND	ND	ND	3000
Benzo (a) anthracene	ND	ND	ND	17
Benz (a) pyrene	ND	ND	ND	48
Benzo (b) fluoranthene	ND	ND	ND	360
Benzo (ghi) perylene	ND	ND	ND	6800
Benzo (k) fluoranthene	ND	ND	ND	870
Chrysene	ND	ND	ND	37
Dibenz (a,h) anthracene	ND	ND	ND	38
Fluoranthene	ND	ND	ND	500
Fluorene	ND	ND	ND	100
Indeno (1,2,3-cd) pyrene	ND	ND	ND	680
1-Methyl naphthalene	ND	ND	ND	23
2-Methyl naphthalene	ND	ND	ND	20
Naphthalene	ND	ND	ND	0.4
Phenanthrene	ND	0.042 ^J	0.055 ^J	1.8
Pyrene	ND	ND	ND	8700

(1) = for protection of groundwater
mg/kg = milligrams per kilogram

^J = detected between LOD & LOQ
ND = no detect

November 5, 2002

SOURCE:
SEH, 2019. Comprehensive Site Investigation Report
NOTE: WDNR Regulatory criteria is not current.

Table 2
SOIL SAMPLE ANALYTICAL RESULTS
POLYAROMATIC HYDROCARBONS (PAH)
NEWELL RUBBERMAID - MIRRO PLANT #20
CHILTON, WISCONSIN
All Contaminants Shown In (mg/kg)

Sample ID	SB-8 6' - 7' 07/15/02	SB-12 5' - 8' 07/15/02	MW-4 2' - 8' 09/26/02	Suggested Generic RCL (1)
Acenaphthene	ND	ND	ND	38
Acenaphthylene	ND	ND	ND	0.7
Anthracene	ND	ND	ND	3000
Benzo (a) anthracene	ND	ND	ND	17
Benz (a) pyrene	ND	ND	17	48
Benzo (b) fluoranthene	ND	ND	16	360
Benzo (ghi) perylene	ND	ND	15	6800
Benzo (k) fluoranthene	ND	ND	ND	870
Chrysene	ND	ND	20	37
Dibenz (a,h) anthracene	ND	ND	ND	38
Fluoranthene	ND	ND	27	500
Fluorene	ND	ND	ND	100
Indeno (1,2,3-cd) pyrene	ND	ND	ND	680
1-Methyl naphthalene	ND	0.080 ^J	ND	23
2-Methyl naphthalene	ND	ND	16	20
Naphthalene	ND	0.010 ^J	ND	0.4
Phenanthrene	ND	0.038 ^J	34	1.8
Pyrene	ND	ND	34	8700

(1) = for protection of groundwater
mg/kg = milligrams per kilogram

^J = detected between LOD & LOQ
ND = no detect

November 5, 2002

SOURCE:
SEH, 2019. Comprehensive Site Investigation Report
NOTE: WDNR Regulatory criteria is not current.

TABLE 3
FORMER MIRRO PLANT #20
CHILTON, WISCONSIN
SOIL ANALYTICAL RESULTS TABLE: METALS
 All contaminants shown in mg/kg

Sample ID	Sample Date	Depth (feet bgs)	Arsenic	Barium	Cadmium	Chromium	Chromium trivalent	Chromium hexavalent	Lead	Mercury	Selenium	Silver
SB-2	07/15/02	0 - 4	6.0	79	1.0 ^J	29	NA	NA	97	0.28	17	4.1
SB-3	07/15/02	0 - 4	2.5	112	1.1 ^J	123	NA	NA	201	0.20	5.0 ^J	2.2 ^J
SB-3	07/15/02	6 - 7	1.1 ^J	40	ND	92	NA	NA	6.2 ^J	0.016 ^J	ND	ND
SB-4	07/15/02	0 - 4	32	52	ND	2100	NA	NA	65	0.11	39	22
SB-4	07/15/02	4 - 7	10 ^J	29	ND	1770	NA	NA	20	0.13	ND	12 ^J
SB-4	07/15/02	8 - 12	10	21	ND	168	NA	NA	6.7 ^J	0.12	15	2.1 ^J
SB-5	07/15/02	0 - 4	4.6	67	ND	156	NA	NA	88	0.37	5.4 ^J	4.7
SB-6	07/15/02	6 - 7	2.0	58	ND	20	NA	NA	19	0.024	7.3 ^J	3.9
MW-1	09/26/02	0 - 2	7.6	NA	0.63	44	44	ND	42	NA	NA	NA
MW-2	09/26/02	2 - 4	5.5	NA	1.2	80	80	ND	60	NA	NA	NA
MW-3	09/26/02	0 - 2	17	NA	2.3	1,600	1,600	ND	390	NA	NA	NA
MW-4	09/26/02	2 - 4	5.5	NA	0.84	760	760	ND	63	NA	NA	NA
Residual Contaminant Levels		NI	0.039	-	8	16000	-	-	50	-	-	-
		I	1.6	-	510	-	-	-	500	-	-	-

ND = No Detect mg/kg = milligrams per kilogram NI = non-industrial I = industrial
 shaded = Industrial Exceedance

November 5, 2002

SOURCE:
 SEH, 2019. Comprehensive Site Investigation Report
 NOTE: WDNR Regulatory criteria is not current.

TABLE 4
SOIL SAMPLE ANALYTICAL RESULTS
DIESEL RANGE ORGANICS (DRO)
NEWELL RUBBERMAID - MIRRO PLANT #20
CHILTON, WISCONSIN

Sample ID	Sample Date	Feet (bgs)	DRO (mg/kg)
SB-1	07/15/02	0 - 4	ND
SB-2	07/15/02	0 - 4	ND
SB-3	07/15/02	0 - 4	10
SB-6	07/15/02	6 - 7	30
SB-10	07/15/02	5 - 6	ND
SB-11	07/15/02	6 - 7	ND
Residual Contaminant Level (RCL)			100
ND	= No Detect	mg/kg	= milligrams per kilogram
bgs	= below ground surface	shaded	= exceeds RCL

August 11, 2002

SOURCE:
SEH, 2019. Comprehensive Site Investigation Report
NOTE: WDNR Regulatory criteria is not current.

TABLE 5
SOIL ANALYTICAL RESULTS TABLE: PCB
NEWELL RUBBERMAID - MIRRO PLANT #20
CHILTON, WISCONSIN
All Contaminants Shown in µg/kg

Sample ID	Sample Date	Depth (feet bgs)	Aroclor 1016	Aroclor 1221	Aroclor 1232	Aroclor 1242	Aroclor 1248	Aroclor 1254	Aroclor 1260
SB-5	07/15/02	0 - 4	ND	ND	ND	ND	ND	ND	ND
Residual Contaminant Levels									
ND = No Detect			µg/kg = micrograms per kilogram				August 11, 2002		

SOURCE:
 SEH, 2019. Comprehensive Site Investigation Report
 NOTE: WDNR Regulatory criteria is not current.

Table A.3
Residual Soil Contamination Table

Table A.3

Analytical Parameters	Direct Contact Industrial Site RCLs (mg/kg)	Groundwater Pathway RCLs (mg/kg)	Boring No./Depth Below Surface(ft)																
			SB-2	SB-3	SB-5	SB-6	MW-1	MW-2	MW-4	MW-7	MW-8	MW-9	B-6	B-7	B-8	B-9	B-10	PZ-9	PZ-10
			0-4	0-4	0-4	6-7	0-2	2-4	2-4	0-4	4-6	0-4	1.5-3	1-2.5	1-2.5	1-2	0.5-1.5	4-6	2-4
VOCs (mg/kg)																			
Methylene Chloride	1150	.0026															0.174		
Tetrachloroethylene	145	.0045															0.133		
Trichloroethylene	8.41	.0036																1.5	2.6
1,2,4 Trimethylbenzene	219	1.38																	
Xylenes	260	3.96												4.29	91.9	4.74			
Metals (mg/kg)																			
Cadmium	985	0.752	1.0	1.1					1.2	0.84		0.804							
Lead	800	27	97	201	88		42	42	63				50.8						
Mercury	3.13	0.208	0.28		0.37														
Selenium	5840	0.52	17	5.0	5.4	7.3				1.08			2.52						
Silver	5840	0.849	4.1	2.2	4.7	3.9													
PAHs (mg/kg)																			
Benzo (a) Pyrene	2.11	0.47								0.815									
Benzo (b) Fluoranthene	21.1	0.48								1.01									
Chrysene	2110	0.15								1.09									
Naphthalene	24.1	0.66													3.69				
<p>Bold = Exceeds Direct Contact Residual Contaminant Level (RCL) for Industrial Sites Only the detected concentrations of parameters exceeding their respective RCLs for either the direct contact pathway or the groundwater pathway are listed. Only parameters with one or more RCL exceedance are listed. Samples analyzed from off-site locations are not included in this table.</p> <p>Compiled by: <u>JEG</u> Checked by: <u>MFR</u></p>																			

SOURCE:
SEH, 2019. Comprehensive Site Investigation Report
NOTE: WDNR Regulatory criteria is not current.

Table 1
 Summary of Detected Constituents in Soil
 44 Walnut Street
 Chilton, Wisconsin

Detected Constituents in Soil	Units	Wisconsin SBTV	Non-Industrial Direct Contact RCL	Industrial Direct Contact RCL	Soil to Groundwater RCL	Sample Name, Date and Depth				
						PP-1	PP-2	PP-3	PP-4	TB1
						06/04/2020 0 - 0.5 ft	06/04/2020 0 - 0.5 ft	06/04/2020 0 - 0.5 ft	06/04/2020 0 - 0.5 ft	06/04/2020 Trip Blank
Metals										
Arsenic	mg/kg	8.3	8.3* [0.677]	8.3* [3]	8.3* [0.584]	3.3	4.1	3.8	3.2	-
Barium	mg/kg	364	15,300	100,000	364* [164.8]	68	100	54	52	-
Cadmium	mg/kg	1.07	71.1	985	1.07* [0.752]	0.78	0.49	0.37	0.45	-
Chromium	mg/kg	43.5	n/v	n/v	360,000 _{If no Cr-VI}	24	22	19	22	-
Lead	mg/kg	51.6	400	800	51.6* [27]	80	70	57	45	-
Mercury	mg/kg	n/v	3.13	3.13	0.208	0.092	0.098	0.091	0.10	-
Volatile Organic Compounds										
Sixty (60) Constituents Analyzed	µg/kg	n/v	Various	Various	Various	ND	ND	ND	ND	ND

Notes:

- mg/kg Milligrams per Kilogram
- µg/kg Micrograms per Kilogram
- SBTV Wisconsin Soil Background Threshold Value per WDNR, 2018, RCL spreadsheet for use with macro-enabled Excel program, December 2018 Update, available at <https://dnr.wi.gov/topic/Brownfields/documents/tech/RCLs.xlsm>.
- RCL Residual contaminant level for noted pathway per WDNR, 2018, RCL spreadsheet for use with macro-enabled Excel program, December 2018 Update, available at <https://dnr.wi.gov/topic/Brownfields/documents/tech/RCLs.xlsm>.
- 57** Concentration with blue shading and bold text indicates concentration exceeds the RCL for the soil to groundwater exposure pathway and/or the SBTV.
- xx* [xxx]** Standard in bold is the SBTV being used for the purpose of evaluation under ch. NR700 Wisconsin Administrative Code (WAC). The established WAC RCL is noted in brackets.
- 45 Measured concentration did not exceed the indicated standard.
- ND The concentrations of all measured constituents are less than laboratory detection limits.
- n/v No standard/guideline value.
- Parameter not analyzed.

SOURCE:
 Stantec. 2020. Focused Phase II ESA

Table 2
 Detected Constituents in Groundwater
 44 Walnut Street
 Chilton, Wisconsin

Detected Constituents in Groundwater	Units	Preventive Action Limit	Enforcement Standard	Basement Monitoring Point Name and Date						Monitoring Well Name and Date				
				B-5	B-5A	B-6	B-9	B-11	B-12	MW-2	MW-8	PZ-9	MW-9	TB2
				06-02-2020	06-02-2020	06-02-2020	06-02-2020	06-02-2020	06-04-2020	06-04-2020	06-04-2020	06-04-2020	06-04-2020	Trip Blank
Volatile Organic Compounds														
Dichloroethene, cis-1,2-	µg/L	7	70	<0.41	<0.41	<0.41	<0.41	6.0	22	<0.41	160	50	<0.41	<0.41
Dichloroethene, trans-1,2-	µg/L	20	100	<0.35	<0.35	<0.35	<0.35	<0.35	0.70 J	<0.35	7.9	4.6	<0.35	<0.35
Tetrachloroethene (PCE)	µg/L	0.5	5	<0.37	<0.37	<0.37	<0.37	<0.37	2.7	<0.37	10	210	<0.37	<0.37
Trichloroethane, 1,1,1-	µg/L	40	200	<0.38	<0.38	<0.38	<0.38	<0.38	<0.38	<0.38	<0.38	1.2	1.2	<0.38
Trichloroethene (TCE)	µg/L	0.5	5	<0.16	<0.16	<0.16	<0.16	0.30 J	2.1	<0.16	12	56	<0.16	<0.16
Trimethylbenzene, 1,2,4-	µg/L	96	480	<0.36	0.42 J	<0.36	<0.36	<0.36	<0.36	<0.36	<0.36	<0.36	<0.36	<0.36
Vinyl Chloride	µg/L	0.02	0.2	<0.20	<0.20	<0.22	<0.20	<0.20	<0.20	<0.20	6.3	<0.20	<0.20	<0.20

Notes:

- µg/L Micrograms per liter
- 50** Constituent concentration with yellow shading and **bold text** indicates concentration is greater than the ch. NR 140 Wisconsin Administrative Code (WAC) Preventive Action Limit
- 210** Constituent concentration with red shading and **bold, underlined text** indicates concentration is greater than the ch. NR 140 WAC Enforcement Standard
- 4.6 Measured concentration did not exceed the indicated standard
- <0.35 Analyte was not detected at a concentration greater than the laboratory reporting limit
- J The reported result is an estimated value

SOURCE:
 Stantec. 2020. Focused Phase II ESA

Table 3
 Detected VOCs and Vapor Risk Screening Levels
 44 Walnut Street
 Chilton, Wisconsin

Detected Constituents	Vapor Action Level for Small Commercial Building (ug/m ³)	Henry's Law Constant (15°C)	Attenuation Factor for Industrial Building*	Groundwater VRSL (ug/L)	Basement Monitoring Point Name and Date						Sump Crock Name and Date			Monitoring Well Name and Date				Trip Blank
					B-5	B-5A	B-6	B-9	B-11	B-12	SUMP - LARGE	SUMP - EAST	SUMP - WEST	MW-2	MW-8	PZ-9	MW-9	
					06-02-2020	06-02-2020	06-02-2020	06-02-2020	06-02-2020	06-04-2020	06-04-2020	06-04-2020	06-04-2020	06-04-2020	06-04-2020	06-04-2020	06-04-2020	
Volatile Organic Compounds (ug/L)																		
Dichloroethane, 1,2-	4.7	0.02514863	0.01	19	<0.39	<0.39	<0.39	<0.39	<0.39	<0.39	0.53 J	<0.39	<0.39	<0.39	<0.39	<0.39	<0.39	<0.39
Dichloroethene, cis-1,2-	n/v	0.10973705	0.01	n/v	<0.41	<0.41	<0.41	<0.41	6.0	22	28	110	<0.41	<0.41	160	50	<0.41	<0.41
Dichloroethene, trans-1,2-	n/v	0.26132728	0.01	n/v	<0.35	<0.35	<0.35	<0.35	<0.35	0.70 J	1.0	1.9	<0.35	<0.35	7.9	4.6	<0.35	<0.35
Tetrachloroethene (PCE)	180	0.44483927	0.01	5	<0.37	<0.37	<0.37	<0.37	<0.37	2.7	1.9	9.6	<0.37	<0.37	10	210	<0.37	<0.37
Trichloroethane, 1,1,1-	22,000	0.45864188	0.01	4797	<0.38	<0.38	<0.38	<0.38	<0.38	<0.38	<0.38	<0.38	<0.38	<0.38	<0.38	1.2	1.2	<0.38
Trichloroethene (TCE)	8.8	0.26415974	0.01	5	<0.16	<0.16	<0.16	<0.16	0.30 J	2.1	2.1	8.4	<0.16	<0.16	12	56	<0.16	<0.16
Trimethylbenzene, 1,2,4	260	0.13145377	0.01	198	<0.36	0.42 J	<0.36	<0.36	<0.36	<0.36	<0.36	<0.36	<0.36	<0.36	<0.36	<0.36	<0.36	<0.36
Vinyl Chloride	28	0.85275497	0.01	3	<0.20	<0.20	<0.22	<0.20	<0.20	<0.20	0.51 J	0.88 J	<0.20	<0.20	6.3	<0.20	<0.20	<0.20

Notes:

- ug/L Micrograms per liter
- ug/m³ Micrograms per cubic meter
- VRSL Vapor Risk Screening Level for groundwater calculated per WDNR (2019) using Vapor Action Levels per WDNR (2017) available at <https://dnr.wi.gov/topic/Brownfields/documents/vapor/vapor-quick.pdf>
- * Per WDNR (2019), the "sub-slab attenuation factor" was used, as groundwater is near, or in contact with the building foundation.
- Constituent concentration with orange shading and **bold text** indicates the concentration exceeds the Groundwater VRSL.
- 1.0 Measured concentration did not exceed the indicated standard.
- <0.35 Analyte was not detected at a concentration greater than the laboratory reporting limit.
- J The reported result is an estimated value.
- n/v No standard/guideline value.

SOURCE:
 Stantec. 2020. Focused Phase II ESA

Table 4:
Detected PFAS in Groundwater and Sunmp Water
44 Walnut Street
Chilton, Wisconsin

Detected Constituents	Units	Proposed Preventive Action Limit	Proposed Enforcement Standard	Groundwater					Sump Water			Equipment Blank
				Basement Monitoring Point Name and Date		Monitoring Well Name and Date			Sump Crock Name and Date			
				B-5	B-9	MW-2	MW-8	PZ-9	SUMP - LARGE	SUMP - EAST	SUMP - WEST	
				06-02-2020	06-02-2020	06-04-2020	06-04-2020	06-04-2020	06-04-2020	06-04-2020	06-04-2020	
Per- and Polyfluoroalkyl Substances												
6:2 Fluorotelomer sulfonic acid	ng/L	n/v	n/v	2.0 J	3.9 J	<1.8	<1.8	<1.8	3.2 J	<1.7	<1.7	<1.8
Perfluorobutane Sulfonate (PFBS)	ng/L	n/v	n/v	1.1 J	1.1 J	0.61 J	1.1 J	0.76 J	0.82 J	1.2 J	1.3 J	<0.18
Perfluorobutanoic Acid (PFBA)	ng/L	n/v	n/v	1.2 J B	1.5 J B	0.78 J B	2.2 B	1.1 J B	3.5 B	2.1 B	4.6 B	<0.31
Perfluoroheptane Sulfonate (PFHpS)	ng/L	n/v	n/v	<0.17	<0.16	<0.17	<0.17	<0.17	<0.16	<0.16	0.35 J	<0.17
Perfluoroheptanoic Acid (PFHpA)	ng/L	n/v	n/v	<0.22	<0.21	<0.23	0.22 J	<0.23	<0.21	0.25 J	0.42 J	<0.22
Perfluorohexanesulfonic acid (PFHxS)	ng/L	n/v	n/v	1.3 J B	1.3 J B	1.1 J B	3.0 B	0.60 J B	2.1 B	4.1 B	1.6 J B	0.27 J B
Perfluorohexanoic Acid (PFHxA)	ng/L	n/v	n/v	<0.50	<0.49	<0.53	<0.51	<0.53	<0.49	0.66 J	0.95 J	<0.51
Perfluoro-n-Octanoic Acid (PFOA)	ng/L	2	20	<0.74	<0.72	<0.78	2.5	<0.77	3.1	5.5	1.9	<0.75
Perfluorooctane Sulfonate (PFOS)	ng/L	2	20	<0.47	1.8	<0.50	1.2 J	0.62 J	4.0	2.3	32	<0.47
Perfluorooctanesulfonamide (FOSA)	ng/L	n/v	n/v	0.32 J	0.33 J	<0.32	0.41 J	<0.32	0.32 J	0.35 J	0.53 J	0.31 J
Perfluoropentanesulfonic Acid (PFPeS)	ng/L	n/v	n/v	<0.26	<0.25	<0.28	<0.26	<0.27	<0.26	<0.25	0.29 J	<0.26
Perfluoropentanoic Acid (PFPeA)	ng/L	n/v	n/v	0.58 J	0.47 J	<0.45	0.59 J	<0.44	1.7	0.55 J	1.0 J	<0.43
Total PFOA + PFOS	ng/L	2	20	<0.74	1.8	<0.78	3.7	0.62 J	7.1	7.8	33.9	<0.75

Notes:

ng/L

Nanograms per Liter

7.8

Concentration with yellow shading and **bold text** indicates concentration is greater than the proposed Preventive Action Limit.

33.9

Concentration with red shading and **bold, underlined text** indicates concentration is greater than the proposed Enforcement Standard.

1.8

Measured concentration did not exceed the indicated standard.

<0.17

Analyte was not detected at a concentration greater than the laboratory reporting limit.

B

Indicates analyte was found in associated blank, as well as in the sample.

J

The reported result is an estimated value.

n/v

No standard/guideline value.

SOURCE:
Stantec. 2020. Focused Phase II ESA

Table 5
 YSI Multi-Probe Water Quality Measurements
 44 Walnut Street
 Chilton, Wisconsin

Sample Location Name	Date	Time	Physical Water Quality Parameters							Oxidation Reduction Potential mV
			Temperature	Conductivity		Dissolved Oxygen		pH		
			(°C)	uS/cm ³	uS/cm	%	mg/L			
Basement Monitoring Points										
B-5	6/2/2020	1625	12.30	933	707	10.8	1.15	7.33	-78.4	
		1627	12.30	933	707	10.5	1.12	7.33	-77.9	
		1628	12.29	933	706	10.0	1.07	7.33	-78.9	
		1629	12.28	933	707	9.8	1.04	7.33	-79.0	
B-5A	6/2/2020	1550	14.71	944	758	78.2	7.91	7.53	-70.7	
		1551	14.71	944	758	77.9	7.89	7.53	-70.7	
		1552	14.71	944	758	77.7	7.86	7.53	-70.1	
B-6	6/2/2020	1507	14.59	942	755	15.8	1.51	7.74	-93.8	
		1508	14.53	942	754	11.9	1.21	7.42	-94.8	
		1509	14.50	943	754	10.3	1.05	7.41	-95.8	
		1510	14.49	943	753	9.1	0.92	7.41	-94.0	
		1511	14.48	943	754	8.5	0.86	7.40	-96.6	
B-9	6/2/2020	1416	14.49	974	778	19.3	1.91	7.4	-90.9	
		1417	14.46	973	777	13.5	1.36	7.38	-92.1	
		1418	14.41	971	775	10.2	1.03	7.35	-92.9	
		1419	14.41	971	775	9.6	0.97	7.35	-92.2	
		1420	14.41	971	774	9.1	0.92	7.35	-93.1	
B-11	6/2/2020	1207	14.46	1310	1047	14.7	1.50	7.22	-51.2	
		1208	14.46	1310	1046	14.2	1.45	7.23	-50.2	
		1209	14.46	1310	1046	14.5	1.46	7.23	-49.4	
B-12	6/4/2020	1050	15.41	1273	1040	19.4	1.92	7.19	-99.4	
		1051	15.39	1275	1041	17.6	1.75	7.19	-98.8	
		1052	15.36	1277	1042	16.3	1.61	7.20	-99.5	
		1053	15.31	1278	1041	14.4	1.43	7.20	-100.5	
		1054	15.30	1278	1041	13.1	1.3	7.21	-100.6	
Basement Sumps	6/4/2020	1203	13.92	1123	886	56.6	5.82	7.40	-55.1	
		1204	13.91	1123	885	56.7	5.83	7.40	-55.6	
		1205	13.93	1123	886	56.7	5.84	7.40	-56.2	
		1131	14.98	1183	957	70.6	7.08	7.51	-1.6	
		1133	14.99	1183	957	70.5	7.09	7.50	-3.9	
SUMP - WEST	6/4/2020	1239	15.10	823	668	80.0	8.03	7.92	23.9	
		1240	15.09	824	668	79.5	8.00	7.91	20.3	
		1241	15.09	824	668	80.6	8.09	7.91	19.2	
Monitoring Wells										
MW-2	6/4/2020	1609	8.78	920	635	7.2	0.83	7.36	-118.1	
		1610	8.77	920	635	7.1	0.82	7.33	-117.3	
		1611	8.77	921	635	6.7	0.77	7.31	-115.7	
MW-8	6/4/2020	1534	10.57	1361	986	5.1	0.56	7.18	37.2	
MW-9	6/4/2020	1430	15.07	620	505	122.7	12.20	7.36	95.0	
		1431	14.90	882	726	113.0	11.38	7.33	97.1	
		1432	14.57	1059	849	108.0	10.96	7.33	97.3	
		1433	14.08	1069	845	104.6	10.73	7.33	97.4	
		1434	13.93	1070	844	103.3	10.64	7.33	97.4	
PZ-9	6/4/2020	1503	9.67	821	581	75.3	8.54	7.07	107.8	
		1504	9.65	820	580	74.7	8.47	7.07	107.6	
		1507	9.62	824	582	73.4	8.34	7.08	106.1	
		1508	9.62	824	582	72.9	8.28	7.08	105.9	
		1508	9.62	824	582	72.9	8.28	7.08	105.9	
Staff Gauges										
SG-1	6/4/2020	1615	24.3	615	604	103.2	8.41	8.26	29.3	

Notes:

°C
 uS/cm³
 uS/cm
 mg/L

Degrees Celsius
 Microsiemens per cubic centimeter
 Microsiemens per centimeter
 Milligrams per liter

Water parameters were taken in conjunction with sampling using a handheld YSI Model 556 MPS multiparameter water quality meter.

SOURCE:
 Stantec. 2020. Focused Phase II ESA

Table 6:
Elevation of Groundwater and River Water
44 Walnut Street
Chilton, Wisconsin

¹ Sample location	Top of Ground Surface (ft amsl)	Top of Well Casing (ft amsl)	Depth to Bottom (ft below TOC)	Depth to Water (ft below TOC)	Water Elevation (ft amsl)
Basement Monitoring Points					
B-6	843.82	846.58	5.03	2.88	843.70
B-5A	843.94	846.25	5.03	2.33	843.92
B-5	843.94	846.31	14.28	1.48	844.83
B-9	843.81	846.43	5.04	2.90	843.53
B-11	843.76	845.28	5.05	1.48	843.80
B-12	843.82	846.63	5.05	2.83	843.80
Groundwater Monitoring Wells					
PZ-10 (ID VT231)	NM	849.80	30.50	5.78	844.02
MW-9 (ID OX092)	852.54	852.13	13.02	5.30	846.83
MW-2 (ID OZ091)	848.62	850.78	15.38	6.04	844.74
MW-1	848.48	NM	NM	NM	NM
MW-8	847.88	847.38	11.88	3.46	843.92
PZ-8	847.76	847.51	27.47	2.64	844.87
PZ-9 (ID VT232)	852.61	851.79	27.82	6.14	845.65
PZ-9D* (ID VP423)	852.61	852.08	44.40	5.59	846.49
River Staff Gauges					
SG-1	NM	848.48	NM	4.23	844.25
SG-2	NM	848.07	NM	4.04	844.03
SG-3	NM	847.58	NM	3.87	843.71

Notes:

- ft amsl Feet above mean sea level; the elevation of the ground surface and the top of the well casing was surveyed by CornerPoint; see Appendix D of the Stantec (2020) Phase II ESA.
- ft below TOC Feet below top of casing
- NM Not measured
- ¹ Unique Wisconsin Well ID noted in parentheses, where applicable
- * The designation "PZ-9D" was assigned by Stantec to an undocumented well present immediately west of MW-9 and PZ-9

SOURCE:
Stantec. 2020. Focused Phase II ESA

Table 7
 Detected Constituents in Sludge/Residues on Basement Floor
 44 Walnut Street
 Chilton, Wisconsin

Detected Constituents in Sludge	Units	TSCA	TC Rule		Sludge Sample Name and Date					
			Regulatory Level (mg/L)	"20 Times Rule" (mg/kg)	SS-1	SS-2	SS-3	SS-4	SS-5	SS-6
					06/02/2020	06/02/2020	06/04/2020	06/04/2020	06/04/2020	06/04/2020
Metals										
Arsenic	mg/kg	n/v	5.0	100	6.4	72	29	<0.57	7.8	47
Barium	mg/kg	n/v	100.0	2000	420	1800	220	5200	890	300
Cadmium	mg/kg	n/v	1.0	20	55	2.0 J	<0.35	0.87	2.6	1.2
Chromium	mg/kg	n/v	5.0	100	290	250	52	1700	820	160
Lead	mg/kg	n/v	5.0	100	170	64	49	6800	3300	41
Mercury	mg/kg	n/v	0.2	4	0.32	<0.12	<0.055	0.013 J	0.079	0.028 J
Selenium	mg/kg	n/v	1.0	20	<1.6 F1	33	<5.8	1.4 J	1.8	<2.2
Silver	mg/kg	n/v	5.0	100	0.48 J	<2.8	<1.3	<0.22	0.63 J	<0.48
Polychlorinated Biphenyls										
Aroclor 1254 (only detected PCB)	mg/kg	50	n/v	n/v	2.5	<0.026	0.096 J	<0.18	0.87	0.53
Polycyclic Aromatic Hydrocarbons										
Acenaphthene	µg/kg	n/v	n/v	n/v	220 J	<150	<180	-	<130	<72
Acenaphthylene	µg/kg	n/v	n/v	n/v	590	<110	<130	-	<96	<53
Anthracene	µg/kg	n/v	n/v	n/v	640	<140	<170	-	<120	<67
Benzo(a)anthracene	µg/kg	n/v	n/v	n/v	4400	<110	<130	-	<98	<54
Benzo(a)pyrene	µg/kg	n/v	n/v	n/v	5200	<160	<190	-	<140	<78
Benzo(b)fluoranthene	µg/kg	n/v	n/v	n/v	9800	<180	<220	-	<160	<87
Benzo(g,h,i)perylene	µg/kg	n/v	n/v	n/v	2800	<260	<320	-	<230	<130
Benzo(k)fluoranthene	µg/kg	n/v	n/v	n/v	4500	<240	<290	-	<210	<120
Chrysene	µg/kg	n/v	n/v	n/v	6200	<220	<270	-	<200	<110
Fluoranthene	µg/kg	n/v	n/v	n/v	14000	<150	<190	-	330 J	<74
Fluorene	µg/kg	n/v	n/v	n/v	260 J	<110	<140	-	<100	<56
Indeno(1,2,3-cd)pyrene	µg/kg	n/v	n/v	n/v	2700	<210	<260	-	<190	<100
Methylnaphthalene, 1-	µg/kg	n/v	n/v	n/v	330 J	<200	<240	-	<180	<98
Methylnaphthalene, 2-	µg/kg	n/v	n/v	n/v	350 J	<150	<180	-	<130	<74
Naphthalene	µg/kg	n/v	n/v	n/v	1300	<130	<150	-	<110	<62
Phenanthrene	µg/kg	n/v	n/v	n/v	6900	<110	<140	-	<100	<56
Pyrene	µg/kg	n/v	n/v	n/v	14000	<160	<200	-	160 J	<80
Semi-Volatile Organic Compounds										
Bis(2-ethylhexyl)phthalate	µg/kg	n/v	n/v	n/v	1400 J	<1500	2600 J	-	3200 J	<730
Carbazole	µg/kg	n/v	n/v	n/v	1900 J	<2000	<2500	-	<1800	<1000
Di-n-butyl phthalate	µg/kg	n/v	n/v	n/v	770 J	<1200	<1500	-	1600 J	<610
Methylphenol, 2-	µg/kg	n/v	n/v	n/v	1400 J	<1300	<1600	-	<1200	<640

Notes:

- mg/kg Milligrams per kilogram
- mg/L Milligrams per liter
- µg/kg Micrograms per kilogram
- TSCA Toxic Substances Control Act
- 1 Polychlorinated biphenyls (PCBs) are regulated under TSCA per 40 Code of Federal Regulations (CFR) § 761.61 - PCB remediation waste. Total PCB concentrations greater than 50 mg/kg require special handling/disposal per 40 CFR 761.61(a)(5)(i)(B)(2)(iii) and WDNR Pub RR-786.
- TC Toxicity Characteristic
- 2 TC Rule is used to determine whether or not a solid waste is (characteristically) hazardous. Note that Toxicity Characteristic Leachate Procedure (TCLP) samples were **not** run for this event, only totals; the "20 Times Rule" is listed as a comparison for samples that may warrant TCLP sampling to determine whether the leachable concentrations of toxic constituents are below regulatory levels (40 CFR § 261.24 - Toxicity characteristic).
- 15.2 Constituent concentration with orange shading and **bold text** indicates the concentration exceeds the "20 Times Rule".
- <0.03 Measured concentration did not exceed the indicated standard.
- <0.03 Analyte was not detected at a concentration greater than the laboratory reporting limit.
- n/v No standard/guideline value.
- Parameter not analyzed.
- F1 MS and/or MSD Recovery is outside acceptance limits.
- J The reported result is an estimated value.

SOURCE:
Stantec. 2020. Focused Phase II ESA

Table 8
Detected Constituents in Sump Water
44 Walnut Street
Chilton, Wisconsin

Detected Constituents	Units	¹ Surface Water Quality Criteria		Sump Crock Name and Date		
		² Human Threshold Criteria	³ Human Cancer Criteria	SUMP - LARGE 06-04-2020	SUMP - EAST 06-04-2020	SUMP - WEST 06-04-2020
Dissolved Metals (Field Filtered)						
Arsenic	mg/L	n/v	0.013	0.00095 J	0.00075 J	0.00049 J
Barium	mg/L	n/v	n/v	0.067	0.090	0.028
Chromium	mg/L	n/v	n/v	0.0044 J	<0.0011	<0.0011
Polycyclic Aromatic Hydrocarbons						
Eighteen (18) Constituents Analyzer	µg/L	n/v	n/v	ND	ND	ND
Volatile Organic Compound:						
Dichloroethane, 1,2	µg/L	n/v	217	0.53 J	<0.39	<0.39
Dichloroethene, cis-1,2	µg/L	14,000	n/v	28	110	<0.41
Dichloroethene, trans-1,2	µg/L	24,000	n/v	1.0	1.9	<0.35
Tetrachloroethene (PCE)	µg/L	n/v	46	1.9	9.6	<0.37
Trichloroethene (TCE)	µg/L	n/v	539	2.1	8.4	<0.16
Vinyl Chloride	µg/L	n/v	10	0.51 J	0.88 J	<0.20
Per- and Polyfluoroalkyl Substances:						
6:2 Fluorotelomer sulfonic acid	ng/L	n/v	n/v	3.2 J	<1.7	<1.7
Perfluorobutane Sulfonate (PFBS)	ng/L	n/v	n/v	0.82 J	1.2 J	1.3 J
Perfluorobutanoic Acid (PFBA)	ng/L	n/v	n/v	3.5 B	2.1 B	4.6 B
Perfluoroheptane Sulfonate (PFHpS)	ng/L	n/v	n/v	<0.16	<0.16	0.35 J
Perfluoroheptanoic Acid (PFHpA)	ng/L	n/v	n/v	<0.21	0.25 J	0.42 J
Perfluorohexanesulfonic acid (PFHxS)	ng/L	n/v	n/v	2.1 B	4.1 B	1.6 J B
Perfluorohexanoic Acid (PFHxA)	ng/L	n/v	n/v	<0.49	0.66 J	0.95 J
Perfluoro-n-Octanoic Acid (PFOA)	ng/L	n/v	n/v	3.1	5.5	1.9
Perfluorononanesulfonic Acid (PFNS)	ng/L	n/v	n/v	<0.14	<0.13	<0.14
Perfluorononanoic Acid (PFNA)	ng/L	n/v	n/v	<0.23	<0.22	<0.23
Perfluorooctane Sulfonate (PFOS)	ng/L	n/v	n/v	4	2.3	32
Perfluorooctanesulfonamide (FOSA)	ng/L	n/v	n/v	0.32 J	0.35 J	0.53 J
Perfluoropentanesulfonic Acid (PFPeS)	ng/L	n/v	n/v	<0.26	<0.25	0.29 J
Perfluoropentanoic Acid (PFPeA)	ng/L	n/v	n/v	1.7	0.55 J	1.0 J
Total PFOA + PFOS	ng/L	n/v	n/v	7.1	7.8	33.9

Notes:

- ug/L Micrograms per liter
- mg/L Milligrams per liter
- Constituent concentration with orange shading and bold text indicates the concentration exceeds Surface Water Quality Criteria
- 15.2 Measured concentration did not exceed the indicated standard
- <0.03 Analyte was not detected at a concentration greater than the laboratory reporting limit
- J The reported result is an estimated value
- n/v No standard/guideline value
- ND Not detected.
- 1 Values taken from Chapter NR 105 Wisconsin Administrative Code (WAC) - Surface Water Quality Criteria and Secondary Values for Toxic Substances.
- 2 Per Ch. NR 105.08 WAC - Table 8 using criteria for "Non-Public Water Supply" and "Warm Water Forage, Limited Forage, and Warm Water Sport Fish Communities".
- 3 Per Ch. NR 105.09 WAC - Table 9 using criteria for "Non-Public Water Supply" and "Warm Water Forage, Limited Forage, and Warm Water Sport Fish Communities".

SOURCE:
Stantec. 2020. Focused Phase II ESA

APPENDIX G
CERTIFIED SURVEY MAP

LEGEND

---	SECTION 1/4 SECTION LINE
---	PROPERTY LINE
---	EASEMENT
---	CHAIN LINK FENCE
---	GUARD RAIL
---	METAL FENCE
---	WOOD FENCE
---	TREE LINE
---	OVERHEAD UTILITY LINE
---	ELECTRIC
---	TELEPHONE
---	FIBER OPTIC
---	CABLE TV
---	SANITARY SEWER
---	FORCE MAIN
---	STORM SEWER
---	WATER MAIN
---	GAS
---	EXISTING MAJOR CONTOUR
---	EXISTING MINOR CONTOUR

⊙	MANHOLE	⊙	IRON PIPE FOUNDSET
⊙	CATCH BASIN	⊙	REBAR FOUNDSET
⊙	CATCH BASIN (ROUND)	⊙	CHISELED CROSS FOUNDSET
⊙	ROOF DRAIN	⊙	PK NAIL FOUNDSET
⊙	HYDRANT	⊙	SPIRICAL
⊙	WATER VALVE	⊙	MONUMENT
⊙	GAS VALVE	⊙	BENCHMARK
⊙	UTILITY POLE	⊙	SIGN
⊙	GUY WIRE	⊙	DECIDUOUS TREE (diameter)
⊙	GAS METER	⊙	CONIFEROUS TREE (diameter)
⊙	ELECTRIC METER	⊙	BUSH
⊙	UTILITY PEDESTAL	⊙	POST
⊙	HANDHOLE	⊙	SOIL BORING
⊙	TRAFFIC SIGNAL	⊙	MONITORING WELL
⊙		⊙	CULVERT END
⊙		⊙	LIGHT POLE

WELL	NORTHING	EASTING	GROUND	PVC
B-5	479395.8	893934.3	843.94	846.31
B-5A	479396.5	893933.9	843.94	846.25
B-6	479492.0	893952.4	843.82	846.58
B-9	479440.4	894024.0	843.81	846.43
B-11	479363.2	894102.1	843.76	845.28
B-12	479339.3	894152.5	843.82	846.63
MW-1	479418.1	893855.5	848.81	850.08
MW-2	479447.7	893875.2	848.60	850.82
MW-5	479409.8	894290.0	846.31	848.93
PZ-5	479412.1	894287.4	846.10	848.50
MW-6	479446.7	894154.9	846.67	846.68
MW-7	479494.5	894083.6	846.87	846.90
MW-8	479290.2	894171.7	848.19	847.58
MW-8	479294.1	894174.4	847.99	848.13
MW-9	479163.3	894104.0	852.52	852.16
PZ-9	479164.7	894101.1	852.59	851.84
PZ-9D	479167.9	894096.5	852.56	852.12
MW-10	479525.7	894169.3	846.46	849.93
PZ-10	479527.6	894166.1	846.25	849.80
OFFSITE MW	479405.3	894293.7	846.38	849.24

NOTE:

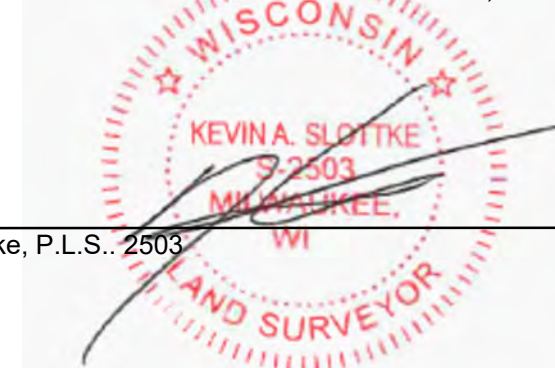
The outer boundary shown is based on the deed as noted below. The Calumet County GIS website shows this property being comprised of 2 tax parcels. Local ID Nos. 16951 & 16631. The tax key boundaries are shown for reference only

Legal description per deed Doc No. 352713

A parcel of land located in Out Lots Eleven (11), Fifteen (15), Sixteen (16) and Block Eighteen (18), Township Eighteen (18) North, Range Twenty (20) East, City of Chilton, Calumet County, Wisconsin, described as follows: Commencing at the Northeast corner of Section 18, thence S 88°59'54" W, 2752.02' on a line with a cross cut in concrete found at the intersection of Breed St. and S.T.H. "57", to a point, (said point lying 24.23' South of the centerline of Breed Street as referred to in 80D432, said centerline of Breed Street being 806.00' North of the point of beginning of this description), thence South 781.77' along the West line of Out Lot 15 to the South side of the Manitowoc River and the point of beginning (being the same as the point of beginning in 80D432) the following 5 calls are along the Southeastery side of the Manitowoc River, being the Northwestery line of 80D432, thence S 73°30' W, 129.0', thence S 57°00' W 38.5', thence S 48°00' W 119.0', thence S 28°30' W 53.0', thence S 32°00' W 82.63' (recorded as 78.7') to the northwestery R/W line of the Chicago, Milwaukee, St. Paul and Pacific Railroad, being the Southwestery line of Walnut St. extended, thence S 56°26'33" E 122.60' along said line to the Northwest corner of 78D465, the following 3 calls along 78D465, thence S 38°40'00" E, 20.79' (Recorded as Northeastery, 4'), thence S 51°26'00" 201.20' (recorded as Northwestery 201.0'), thence N 38°40'00" E, 20.79' (Recorded as Southwestery 21') to the Southwestery line of Walnut St., thence S 56°26'33" E, 3.85' along the Southwestery line of Walnut St. to the Southeast corner of P Misc. 465, which is where the line between Lots 3 and 4, Block 18 Chilton Center extended Southwestery intersects with the Southwestery line of Walnut St., thence N 33°37'25" E, 50.00' along the Southeastery line of Walnut St., thence N 33°37'25" E 50.00' along the Southeastery line of P Misc. 465, being said extended line to the Northeastery line of Walnut St. and the Southwest corner of Lot 3, thence S 56°26'33" E 70.00' along the Southeastery line of 49D630 and 71D386, being the Northeastery line of Walnut St. to the Southeast corner of 71D386, thence N 33°37'25" E 125.00' along the Southeastery line of 71D386 to the Northeast corner thereof, thence N 15°50'26" E 235.00' (Recorded as 235') along the Westery line of Y Misc. 339 to the center of the Manitowoc River, as it existed in September 1960, thence down stream along the thread of the Manitowoc River, N 1°20'10" E 161.83' to the Northerly line of 80D432, thence S 75°40' W 126.00' along the Northerly line of 80D432, thence S 65°15' W 67.5' to the point of beginning.

Containing 3.94 Acres

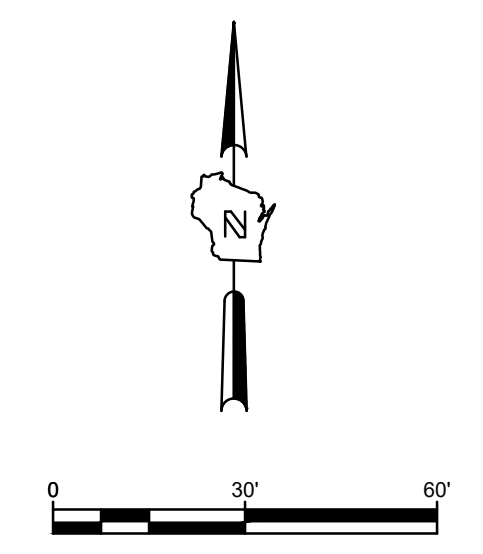
I, Kevin A. Slotke, Professional Land Surveyor, certify that I have surveyed the above described property, to the best of my knowledge and ability, and that the map shown hereon is a true representation thereof and shows the size and location of the property, its exterior boundaries, the location of all visible structures thereon, boundary fences, apparent easements, roadways and encroachments, if any.



Kevin A. Slotke, P.L.S., 2503 December 29, 2020

Former Mirro Plant #20
 44 Walnut Street
 Chilton, Wisconsin

TOPOGRAPHIC SURVEY



1. CHANGE WELL NAMES 1/4/2021 KAS
2. Add interior wells 1/12/2021 KAS
3. Revise well table, add sump, 1/26/2021 KAS
4. Add tax key bound. 2/4/2021 KAS

NO. REVISION	DATE	BY
DRAWING NO.	19824-topo.dwg	
DRAWN BY:	GRG	
DATE:	12/28/2020	
PROJECT NO:	19824	
CHECKED BY:	KAS	
APPROVED BY:	---	
SHEET NO.:		