

**Modification actions taken after
continuing obligations were applied.
Refer to BOTW for further information.**

US REGULATORY INFORMATION

SITE NAME: Eggers Industries West Plant

BRRTS #: 02-36-521430 **FID # (if appropriate):** _____

COMMERCE # (if appropriate): _____

CLOSURE DATE: 01/10/2007

STREET ADDRESS: 1702 13th Ave

CITY: Two Rivers

SOURCE PROPERTY GPS COORDINATES (meters in WTM91 projection): X= 714150 Y= 411008

CONTAMINATED MEDIA: Groundwater Soil Both

OFF-SOURCE GW CONTAMINATION >ES: Yes No

IF YES, STREET ADDRESS 1: _____

GPS COORDINATES (meters in WTM91 projection): X= _____ Y= _____

OFF-SOURCE SOIL CONTAMINATION >Generic or Site-Specific RCL (SSRCL): Yes No

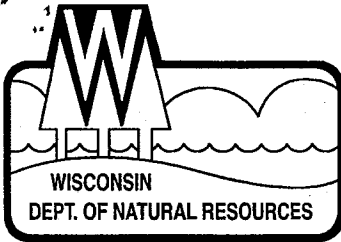
IF YES, STREET ADDRESS 1: _____

GPS COORDINATES (meters in WTM91 projection): X= _____ Y= _____

CONTAMINATION IN RIGHT OF WAY: Yes No

DOCUMENTS NEEDED:

- Closure Letter, and any conditional closure letter or denial letter issued
- Copy of any maintenance plan referenced in the final closure letter.
- Copy of (soil or land use) deed notice *if any required as a condition of closure* NA
- Copy of most recent deed, including legal description, for all affected properties
- Certified survey map or relevant portion of the recorded plat map (*if referenced in the legal description*) for all affected properties
- County Parcel ID number, *if used for county*, for all affected properties
- Location Map** which outlines all properties within contaminated site boundaries on USGS topographic map or plat map in sufficient detail to permit the parcels to be located easily (8.5x14" if paper copy). If groundwater standards are exceeded, the map must also include the location of all municipal and potable wells within 1200' of the site.
- Detailed Site Map(s) for all affected properties**, showing buildings, roads, property boundaries, contaminant sources, utility lines, monitoring wells and potable wells. (8.5x14", if paper copy) This map shall also show the location of all contaminated public streets, highway and railroad rights-of-way in relation to the source property and in relation to the boundaries of groundwater contamination exceeding ch. NR 140 ESs and soil contamination exceeding ch. NR 720 generic or SSRCLs.
- Tables of Latest Groundwater Analytical Results (no shading or cross-hatching)** NA
- Tables of Latest Soil Analytical Results (no shading or cross-hatching)**
- Isoconcentration map(s), if required for site investigation (SI)** (8.5x14" if paper copy). The isoconcentration map should have flow direction and extent of groundwater contamination defined. If not available, include the latest extent of contaminant plume map.
- GW: Table of water level elevations, with sampling dates, and free product noted if present** NA
- GW: Latest groundwater flow direction/monitoring well location map (should be 2 maps if maximum variation in flow direction is greater than 20 degrees)** NA
- SOIL: Latest horizontal extent of contamination exceeding generic or SSRCLs, with one contour**
- Geologic cross-sections, if required for SI.** (8.5x14" if paper copy)
- RP certified statement that legal descriptions are complete and accurate**
- Copies of off-source notification letters (if applicable)** NA
- Letter informing ROW owner of residual contamination (if applicable)**(public, highway or railroad ROW) NA



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Jim Doyle, Governor
Scott Hassett, Secretary
Ronald W. Kazmierczak, Regional Director

Northeast Region Headquarters
2984 Shawano Ave., P.O. Box 10448
Green Bay, Wisconsin 54307-0448
Telephone 920-662-5100
FAX 920-662-5413
TTY Access via relay - 711

January 10, 2007

Noel Versch
Eggers Industries
1819 E. River Street
Two Rivers, WI 54241

SUBJECT: Final Case Closure with Land Use Limitations or Conditions
Eggers Industries West Plant
1702 Thirteenth Street, Two Rivers, WI 54241
WDNR BRRTS Activity #: 02-36-521430

Dear Mr. Versch:

On December 16, 2005, the Northeast Region Closure Committee reviewed the above referenced case for closure. This committee reviews environmental remediation cases for compliance with state laws and standards to maintain consistency in the closure of these cases.

On December 20, 2005, the Department sent you a case closure denial letter outlining the conditions Eggers Industries needed to meet in order to achieve final site closure. One of the conditions identified in that letter was the filing of a deed restriction on the above referenced property. As communicated to your consultant Shelly Giese, Robert E. Lee & Associates, new legislation (Act 418) that eliminates the requirement for filing a deed restriction became effective on June 3, 2006. Per e-mail conversation with Ms. Giese on September 7, 2006, it was the Department's understanding that the responsible party would pursue closure of the above referenced site using the new legislation. Remaining conditions that needed to be met to achieve final closure were discussed.

Based on the correspondence and data provided in a letter received by the Department on December 5, 2006, it appears that your case has been remediated to Department standards in accordance with s. NR 726.05, Wisconsin Administrative Code. The Department considers this case closed with cap maintenance requirements and soil GIS registration. No further investigation or remediation is required at this time.

Please be aware that pursuant to s. 292.12 Wisconsin Statutes, compliance with the requirements of this letter is a responsibility to which the current property owner and any subsequent property owners must adhere. If these requirements are not followed or if additional information regarding site conditions indicates that contamination on or from the site poses a threat to public health, safety, welfare, or the environment, the Department may take enforcement action under s. 292.11 Wisconsin Statutes to ensure compliance with the specified requirements, limitations or other conditions related to the property or this case may be reopened pursuant to s. NR 726.09, Wis. Adm. Code. It is the Department's intent to conduct

inspections in the future to ensure that the conditions included in this letter including compliance with referenced maintenance plans are met.

Pursuant to s. 292.12(2)(a), Wis. Stats., the pavement or other impervious cap that currently exists in the location shown on the attached map shall be maintained in compliance with the **attached maintenance plan** in order to minimize the infiltration of water and prevent additional groundwater contamination that would violate the groundwater quality standards in ch. NR 140, Wis. Adm. Code, and to prevent direct contact with residual soil contamination that might otherwise pose a threat to human health. If soil in the specific locations described above is excavated in the future, the property owner at the time of excavation must sample and analyze the excavated soil to determine if residual contamination remains. If sampling confirms that contamination is present the property owner at the time of excavation will need to determine whether the material would be considered solid or hazardous waste and ensure that any storage, treatment or disposal is in compliance with applicable statutes and rules. In addition, all current and future owners and occupants of the property need to be aware that excavation of the contaminated soil may pose an inhalation or other direct contact hazard and as a result special precautions may need to be taken during excavation activities to prevent a health threat to humans.

The following activities are prohibited on any portion of the property where pavement or other barrier is required as shown on the attached map, unless prior written approval has been obtained from the Wisconsin Department of Natural Resources: 1) removal of the existing barrier; 2) replacement with another barrier; 3) excavating or grading of the land surface; 4) filling on capped or paved areas; 5) plowing for agricultural cultivation; or 6) construction or placement of a building or other structure.

In addition, depending on site-specific conditions, construction over contaminated materials may result in vapor migration into enclosed structures or migration along newly placed underground utility lines. The potential for vapor inhalation and mitigation should be evaluated when planning any future redevelopment, and measures should be taken to ensure the continued protection of public health, safety, welfare and the environment at the site.

Your site will be listed on the DNR Remediation and Redevelopment GIS Registry of Closed Remediation Sites. Information that was submitted with your closure request application will be included on the GIS Registry. To review the sites on the GIS Registry web page, visit <http://dnr.wi.gov/org/aw/rr/gis/index.htm>. If your property is listed on the GIS Registry because of remaining contamination and you intend to construct or reconstruct a well, you will need prior Department approval in accordance with s. NR 812.09(4)(w), Wis. Adm. Code. To obtain approval, Form 3300-254 needs to be completed and submitted to the DNR Drinking and Groundwater program's regional water supply specialist. This form can be obtained on-line <http://www.dnr.state.wi.us/org/water/dwg/3300254.pdf> or at the web address listed above for the GIS Registry.

Recent groundwater monitoring data at this site indicates exceedances of the NR 140 preventive action limit (PAL) for Trimethylbenzenes at monitoring well 1 and Tetrachloroethylene (PCE) at monitoring well 3, but in compliance with the NR 140 enforcement standard. The Department may grant an exemption to a PAL for a substance of public health concern, other than nitrate, pursuant to s. NR 140.28(2)(b), Wis. Adm. Code, if all of the following criteria are met:

1. The measured or anticipated increase in the concentration of the substance will be minimized to the extent technically and economically feasible.
2. Compliance with the PAL is either not technically or economically feasible.
3. The enforcement standard for the substance will not be attained or exceeded at the point of standards application.
4. Any existing or projected increase in the concentration of the substance above the background concentration does not present a threat to public health or welfare.

Based on the information you provided, the Department believes that the above criteria have been or will be met because of the action taken at the site. Therefore, pursuant to s. NR 140.28(2)(b), Wis. Adm. Code, an exemption to the PAL is granted for Trimethylbenzens at monitoring well 1 and Tetrachloroethylene (PCE) at monitoring well 3. This letter serves as your exemption.

The Department appreciates your efforts to restore the environment at this site. If you have any questions regarding this closure decision or anything outlined in this letter, please contact Vickie Taddy at (920) 662-5178.

Sincerely,



Bruce G. Urben
NER Remediation & Redevelopment Team Supervisor

cc: Shelly Giese, Robert E. Lee & Associates
4664 Golden Pond Park Ct., Oneida, WI 54155
Bill Phelps, DG/2

EXHIBIT B

Eggers Industries Pavement Cover Maintenance Plan

February 1, 2006

**Property Located at:
1702 13th Street, Two Rivers, WI**

WDNR BRRTS Activity # 02-36-521430

TAX Parcel #0000830113

LEGAL DESCRIPTION: Lots Number One (1), Two (2), Three (3), Four (4), Five (5) and Six (6) of Block Number Eighty-three (83); and Lots Number One (1), Two (2), Three (3), Four (4) and Five (5) of Block Number Eighty-four (84); excepting the West Fifteen (15) feet of said Lot Number Five (5); and Lots Number One (1), Two (2), Three (3), Four (4), Eight (8), Nine (9), Ten (10), Eleven (11) and Twelve (12) of Block Number Eighty-seven (87); and Lots Number One (1), Two (2), Three (3) and Four (4) of Block Number Eighty-eight (88); and Lot Number Six (6) of Block Number Ninety (90); All in the City of Two Rivers, according to the Recorded Plat thereof; known as the Original Plat of the said City of Two Rivers.

TOGETHER WITH those portions of the following vacated streets lying adjacent to the above described lots:

Vacated West Street lying between Blocks 83 and 88 and between Blocks 84 and 87.

Vacated Monroe Street lying between the river and the North line of 13th Street.

Vacated 14th Street lying between a line two feet East of the West lines of Lot 3, Block 84 and Lot 3, Block 87 and the East line of vacated Monroe Street.

TOGETHER WITH Easement recorded in Volume 341 of Deeds, Page 385, # 415107 in the Register of Deeds Office for Manitowoc County, Wisconsin, affecting the East 4 feet of the S1/2 Lot 7, Block 87, Original Plat, City of Two Rivers.

INTRODUCTION

This document is the Maintenance Plan for a pavement cover at the above-referenced property in accordance with the requirements of s. NR 724.13(2), Wisconsin Administrative Code. The maintenance activities relate to the existing paved surfaces occupying the area over the contaminated groundwater plume or soil on-site. The contaminated soil is impacted by Polycyclic aromatic hydrocarbons (PAHs). The location of the paved surfaces to be maintained in accordance with this Maintenance Plan, as well as the impacted groundwater plume and soil are identified in the attached map (Attachment A).

COVER AND BUILDING BARRIER PURPOSE

The paved surfaces over the contaminated groundwater plume and soil serve as a barrier to prevent direct human contact with residual soil contamination that might otherwise pose a threat to human health. These paved surfaces also act as a partial filtration barrier to minimize future soil-to-groundwater contamination migration that would violate the groundwater standards in ch. NR 140, Wisconsin Administrative Code. Based on the current and future use of the property, the barrier should function as intended unless disturbed.

ANNUAL INSPECTION

The paved surfaces overlying the contaminated groundwater plume and soil and as depicted in Attachment A will be inspected once a year, normally in the spring after all snow and ice is gone, for deterioration, cracks and other potential problems that can cause additional infiltration into or exposure to underlying soils. The inspections will be performed to evaluate damage due to settling, exposure to the weather, wear from traffic, increasing age and other factors. Any area where soils have become or are likely to become exposed will be documented. A log of the inspections and any repairs will be maintained by the property owner and is included as Attachment B, Pavement Inspection Log. The log will include recommendations for necessary repair of any areas where underlying soils are exposed. Once repairs are completed, they will be documented in the inspection log. A copy of the inspection log will be sent to the Wisconsin Department of Natural Resources ("WDNR") at least annually after every inspection, unless otherwise directed in the case closure letter.

MAINTENANCE ACTIVITIES

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

In the event the paved surfaces overlying the contaminated groundwater plume or soil are removed or replaced, the replacement barrier must be equally impervious. Any replacement barrier will be subject to the same maintenance and inspection guidelines as outlined in this Maintenance Plan unless indicated otherwise by the WDNR or its successor.

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

AMENDMENT OR WITHDRAWAL OF MAINTENANCE PLAN

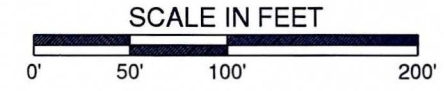
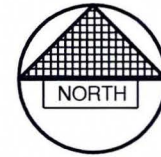
This Maintenance Plan can be amended or withdrawn by the property owner and its successors with the written approval of WDNR.

Contact Information (as of January 2006):

Site Owner and Operator: Eggers Industries, Inc.
Attn: Mr. Jay Streu
1819 East River Street
Two Rivers, WI 54241
(920) 793-1351

Consultant: Robert E. Lee & Associates, Inc.
Attn: Mr. James P. Caine
4664 Golden Pond Park Ct
Oneida, WI 54155
(920) 662-9641

WDNR: Ms. Lisa Evenson
Wisconsin Department of Natural Resources
P.O. Box 10448
Green Bay, WI 54307-0448
(920) 662-5461



MADISON STREET

APPROXIMATE AREA IN EXCEEDANCE OF NR 720 SOIL STANDARDS

APPROXIMATE AREA OF NR 140 P.A.L. EXCEEDANCES

WEST TWIN RIVER

LEGEND

- S-1 PHASE II SOIL SAMPLE BY STRAND
- MW-1 MONITORING WELL LOCATION
- B-1/TW-1 SITE INVESTIGATION SOIL SAMPLE/ TEMPORARY WELL
- REFUSAL

FOURTEENTH STREET

PAVEMENT COVER TO BE MAINTAINED

ASPHALT

EGGERS WEST PLANT

PARKING

EGGERS INDUSTRIES, INC.
1702 13TH STREET
TWO RIVERS, WISCONSIN

SITE MAP

THIRTEENTH STREET

EXHIBIT A

PAVEMENT INSPECTION LOG

Inspection Date	Inspector	Condition of Cap	Recommendations	Have Recommendations from previous inspection been implemented?

Wall, Vickie J - DNR

To: Shelly Giese (sgiese@releeinc.com)
Subject: Eggers Industry BRRTS #02-36-521430

*Sept 07, 2006
Conditional
Closure*

Hi, Shelly,

Keld Lauridsen forwarded your e-mail to me, since I am now the Project Manager for the Eggers Industry site. I just wanted to outline some of the details you and Keld discussed earlier today about this site. Under ACT 418, it is no longer necessary to file a deed restriction on this site as long as it will be registered on the Wisconsin DNR Registry of Closed Remediation Sites. Exhibit B - Pavement Cover Maintenance Plan included in the draft deed restriction (received by our office on February 14, 2006) meets the requirement for a Maintenance Plan as requested in the letter from our office dated December 20, 2005.

You will still need to meet the remaining requirements of the December 20, 2005 letter before this site will be reviewed for final closure.

These requirements include:

- removal of any purge water, waste and soil piles, and submit a letter documenting proper removal and disposal
- monitoring well abandonment and documentation of abandonment on Form 3300-5B

If you have any questions please contact me at 920-662-5178.

Vickie

 *Vickie Wall*

Hydrogeologist
Remediation & Redevelopment Program
Wisconsin Department of Natural Resources
2984 Shawano Avenue
PO Box 10448
Green Bay, WI 54307-0448
(☎) phone: (920) 662-5178
(☎) fax: (920) 662-5179
(✉) e-mail: vickie.wall@dnr.state.wi.us

593837

RECEIVED FOR RECORD
VOL. 723 PAGE 378

1984 JUN 13 AM 10:40

MANITOWOC COUNTY, WIS.
ROBERT B. BRANDL
REGISTER OF DEEDS

This indenture, made by _____
City of Two Rivers, a Municipal Corporation
a Corporation duly organized and existing under and by virtue of the laws of the State of
Wisconsin, grantor, of _____ Manitowoc _____ County, Wisconsin,
hereby quit-claims to _____ Eggers Industries, Inc. _____
_____ grantee _____, of _____ Manitowoc _____
County, Wisconsin, for the sum of _____ One Dollar _____
the following tract of land in _____ Manitowoc _____ County,
State of Wisconsin: _____

RETURN TO
Eggers Industries Inc
18th & River St.
Manitowoc Wis
6-10-84

Lots Number One (1), Two (2), Three (3), Four (4)
Five (5) and Six (6) of Block Number Eighty-three (83); and
Lots Number One (1), Two (2), Three (3), Four (4),
and Five (5) of Block Number Eighty-four (84); excepting
the West Fifteen (15) feet of said Lot Number Five (5); and
Lots Number One (1), Two (2), Three (3), Four (4), Eight (8), Nine (9),
Ten (10), Eleven (11) and Twelve (12) of Block Number Eighty-seven (87); and
Lots Number One (1), Two (2), Three (3) and Four (4) of Block Number
Eighty-eight (88); and
Lot Number Six (6) of Block Number Ninety (90);
ALL IN the City of Two Rivers, according to the Recorded Plat thereof; known
as the Original Plat of the said City of Two Rivers.
TOGETHER WITH those portions of the following vacated streets lying adjacent
to the above described lots:
Vacated West Street lying between Blocks 83 and 88 and between Blocks 84 and 87.
Vacated Monroe Street lying between the river and the North line of 13th Street.
Vacated 14th Street lying between a line two feet East of the West lines of
Lot 3, Block 84 and Lot 3, Block 87 and the East line of vacated Monroe Street.
TOGETHER WITH Easement recorded in Volume 341 of Deeds, page 385, #415107 in the
Register of Deeds Office for Manitowoc County, Wisconsin, affecting the East 4
feet of the S $\frac{1}{2}$ Lot 7, Block 87, Original Plat, City of Two Rivers.

This transaction is exempt from Wisconsin real estate transfer fee pursuant
to Wis. Stats. sec. 77.25(2).

In Witness Whereof, the said grantor has caused these presents to be signed by _____ James R. Grassman
City Manager _____, its President, and countersigned by _____ Elaine D. Hrdina, Deputy City Clerk/Treas.
is Secretary, at _____ Two Rivers _____, Wisconsin, and its corporate seal to be hereunto affixed this
_____ 13th _____ day of _____ June _____, A. D., 19__ 84.

SIGNED AND SEALED IN PRESENCE OF

CITY OF TWO RIVERS
Corporate Name
x _____ James R. Grassman _____
President
James R. Grassman, City Manager
COUNTERSIGNED:
_____ Elaine D. Hrdina _____
Secretary
Elaine D. Hrdina, Deputy City Clerk/Treas.

STATE OF WISCONSIN,
_____ Manitowoc _____ County. } ss.

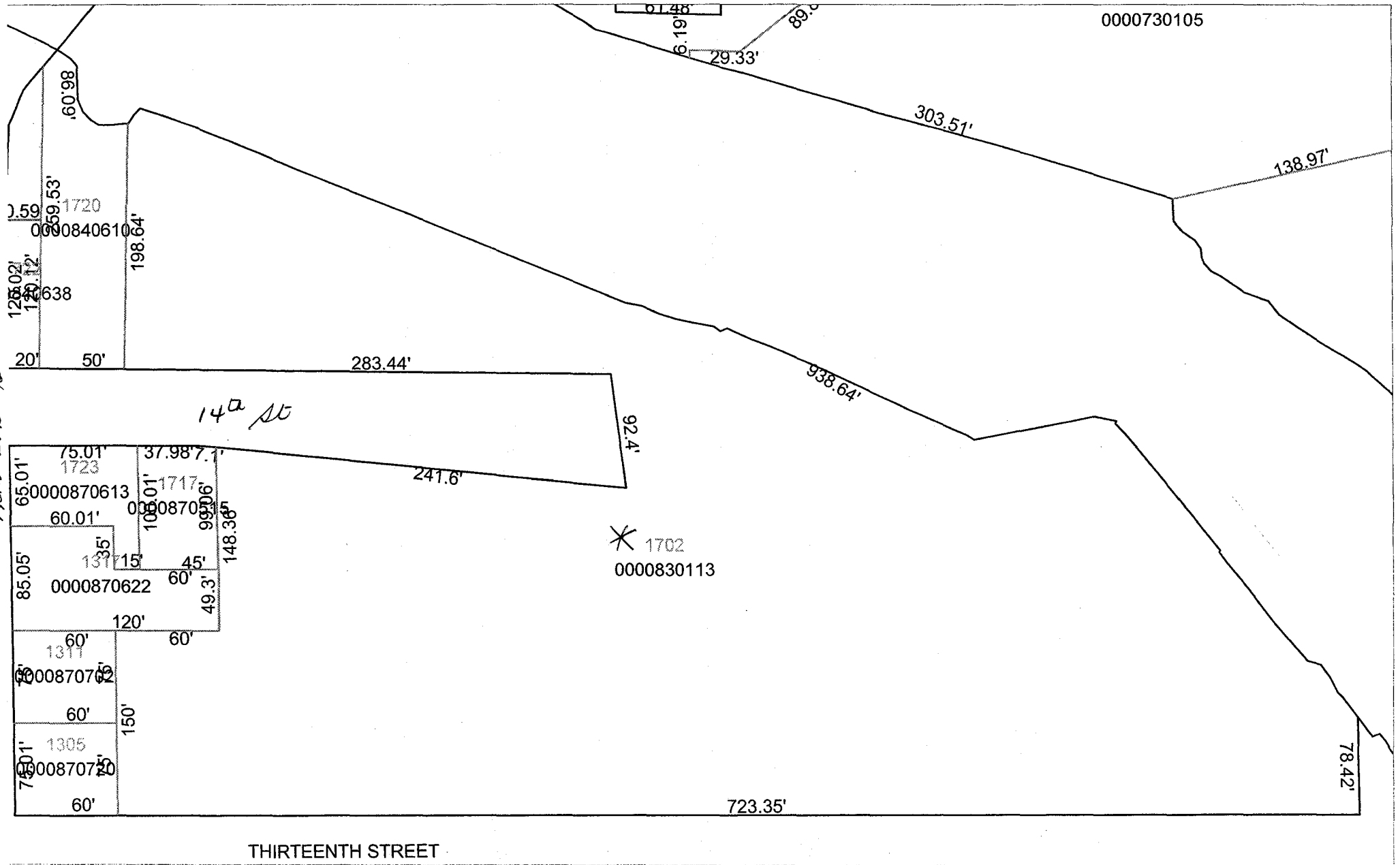
Personally came before me, this _____ 13th _____ day of _____ June _____, A. D., 19__ 84
_____ James R. Grassman, City Manager _____, President, and _____ Elaine D. Hrdina, Dep. City Clerk/Treas.
of the above named Corporation, to me known to be the persons who executed the foregoing instrument, and to me known to be _____
President and Secretary of said Corporation, and acknowledged that they executed the foregoing instrument as such officers, as the deed
of said Corporation, by its authority.

THIS INSTRUMENT WAS DRAFTED BY

ATTY. PETER W. DESCHLER

(SEAL)

Notary Public, _____ Manitowoc _____
My commission (expires) (is) _____ permanent _____



DIMENSIONS APPROX

Unofficial Property Record Card - Two Rivers, WI

General Property Data

Parcel ID 0000830113	Account Number 0
Prior Parcel ID --	
Property Owner EGGERS INDUSTRIES INC	Property Location 1702 13TH STREET
WEST PLANT	Property Use MFG
Mailing Address 1819 EAST RIVER STREET	Most Recent Sale Date
	Legal Reference
City TWO RIVERS	Grantor
Mailing State WI Zip 54241	Sale Price 0
ParcelZoning I1	Land Area 243,848.88 SF

Current Property Assessment

Land Value 143,400	Building Value 724,000	Total Value 867,400
--------------------	------------------------	---------------------

Building Description

Building Style N/A	Foundation Type N/A	Flooring Type N/A
# of Living Units N/A	Frame Type N/A	Basement Floor N/A
Year Built N/A	Roof Structure N/A	Heating Type N/A
Building Grade N/A	Roof Cover N/A	Heating Fuel N/A
Building Condition N/A	Siding N/A	Air Conditioning 0%
Finished Area (SF) N/A	Interior Walls N/A	# of Bsmt Garages 0
Number Rooms 0	# of Bedrooms 0	# of Full Baths 0
# of 3/4 Baths 0	# of 1/2 Baths 0	# of Other Fixtures 0

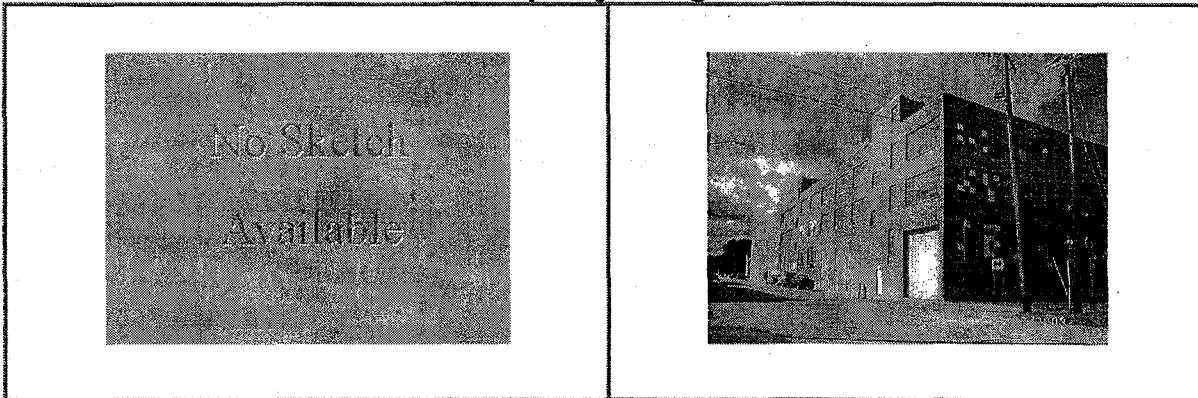
Legal Description

ORIG PLAT ALL OF BLK 83 LOTS 1 THRU 5 EXC THE W 15' OF LOT 5 BLK 84 ALSO LOTS 1 THRU 4 LOTS 8 THRU 12 OF BLK 87 & ALL OF BLK 88 ALSO VAC STS

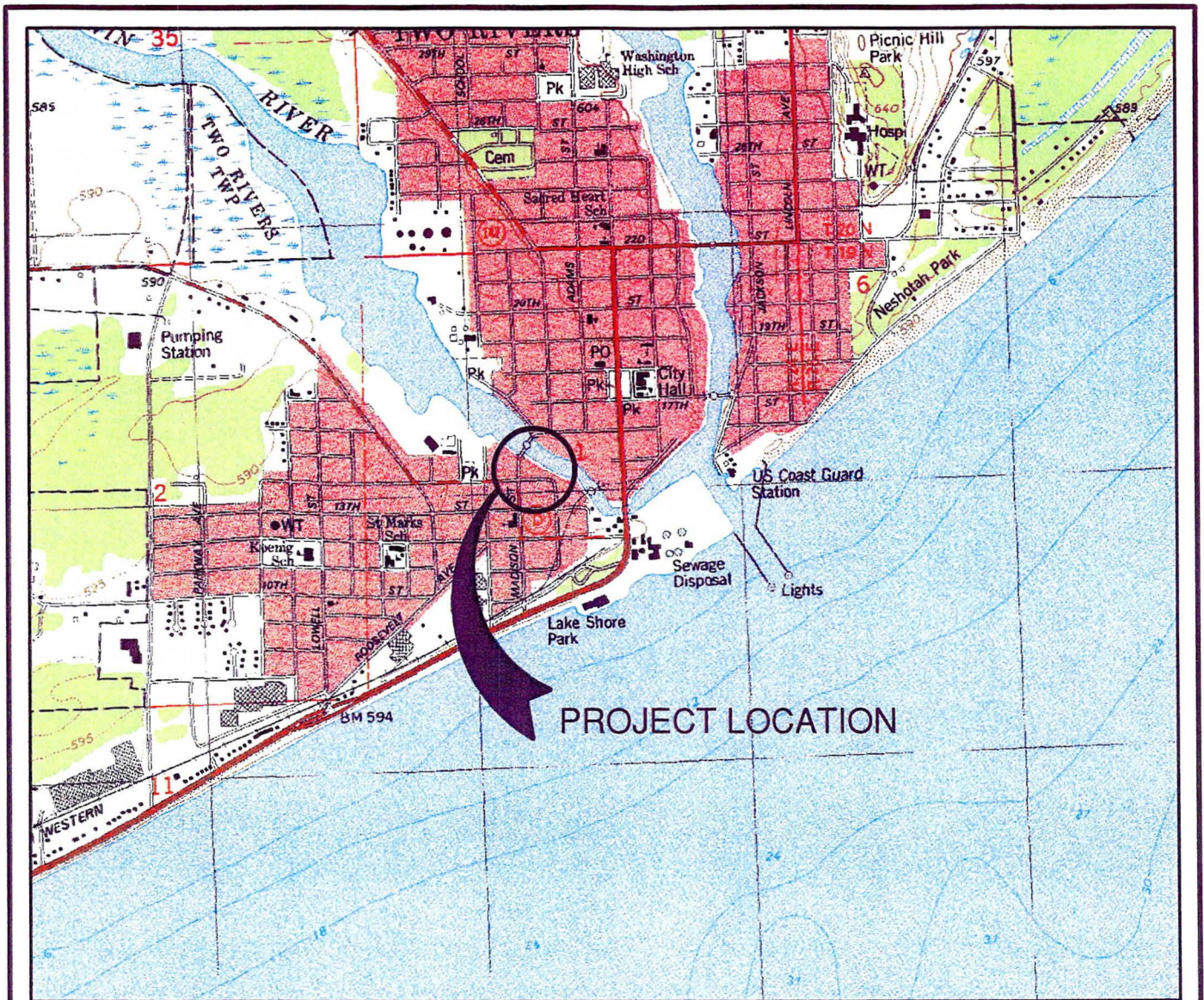
Narrative Description of Property

This property contains 243,848.88 acres of land mainly classified as MFG with a(n) N/A style building, built about N/A, having N/A exterior and N/A roof cover, with N/A unit(s), 0 room(s), 0 bedroom(s), 0 bath(s), 0 half bath(s):

Property Images



Disclaimer: This information is believed to be correct but is subject to change and is not warranted.



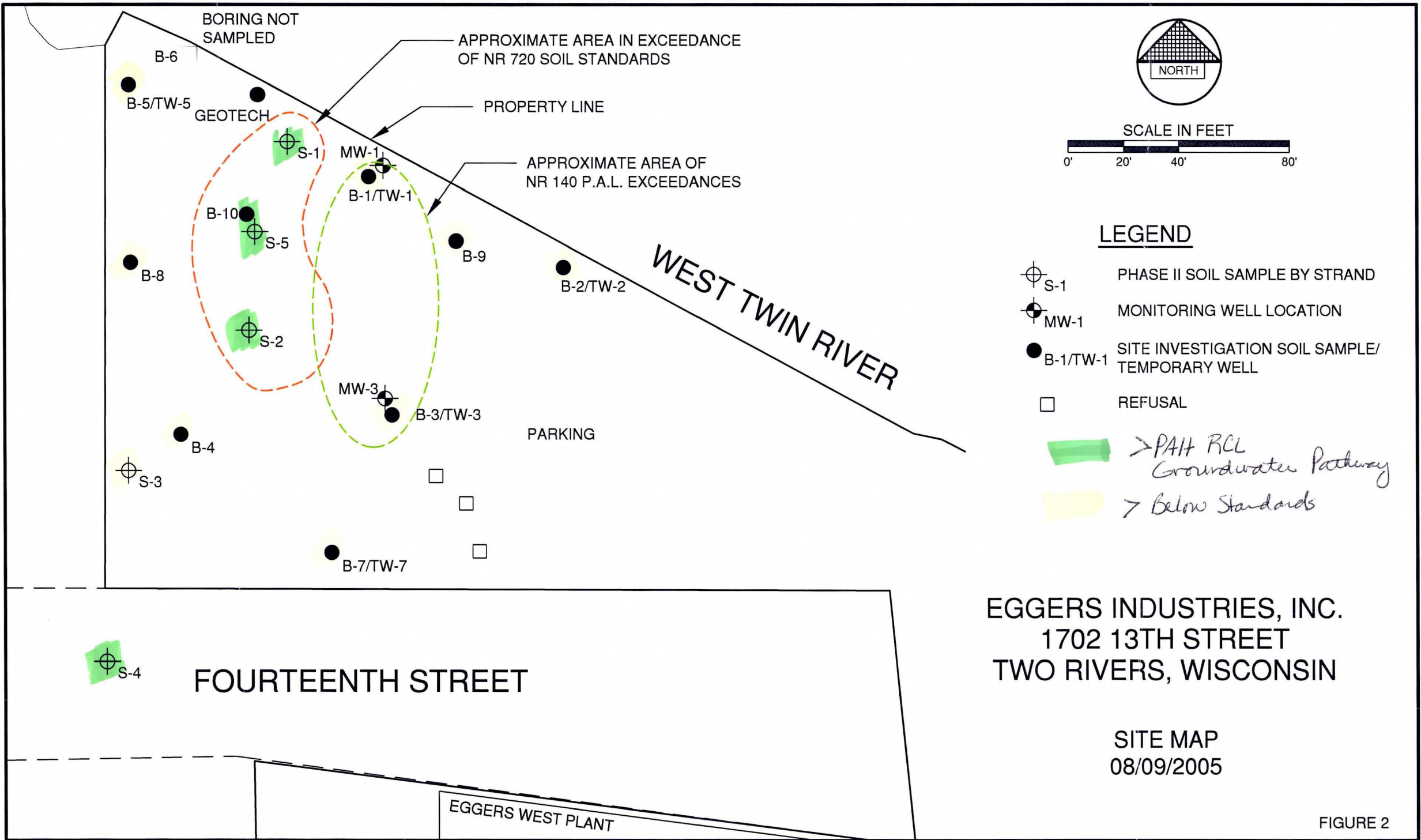
LOCATION MAP

EGGERS INDUSTRIES, INC.
 1702 13TH STREET
 TWO RIVERS, WISCONSIN



1" = 2000'

FIGURE 1



EGGERS INDUSTRIES, INC.
 1702 13TH STREET
 TWO RIVERS, WISCONSIN

SITE MAP
 08/09/2005

FIGURE 2

**TABLE 1
PHASE II ESA SOIL ANALYSIS**

Parameter	NR 720 Standard	S-1 (8-10')	S-2 (8-10')	S-3 (6-8')	S-4 (2-4')	S-5 (8-10')
		10/28/03	10/28/03	10/28/03	10/28/03	
GRO (mg/kg)		NA	NA	NA	NA	347
DRO (mg/kg)		NA	NA	NA	NA	941
VOC (µg/kg)						
Isopropylbenzene	—	241	4,310	<26	<28	NA
p-Isopropyltoluene	—	241	<136	<26	<28	NA
Naphthalene	110,000	402	1,090	<26	22,300	NA
n-Propylbenzene	—	462	9,420	<26	<28	NA
n-Butylbenzene	—	<50	9,310	<26	<28	NA
Sec-Butylbenzene	—	402	5,680	<26	<28	NA
1,2,4-Trimethylbenzene	—	9,440	13,600	<26	190	NA
1,3,5-Trimethylbenzene	—	402	<136	<26	110	NA
Total Xylene	4,100	120	<397	<36	167	NA

☐ = NR 720 Table 1 Soil Standard Exceedance
NA = Not Analyzed

**TABLE 2
GROUNDWATER ELEVATIONS**

Well #	Screen Length	PVC Elev.	Bottom Depth	12/17/04		3/28/05	
				Water Depth	Water Elev.	Water Depth	Water Elev.
MW-1	10	585.00	15.65	10.06	574.94	7.20	577.80
MW-3	10	586.50	14.58	6.61	579.89	10.64	575.86

**TABLE 3
FIELD FID READINGS**

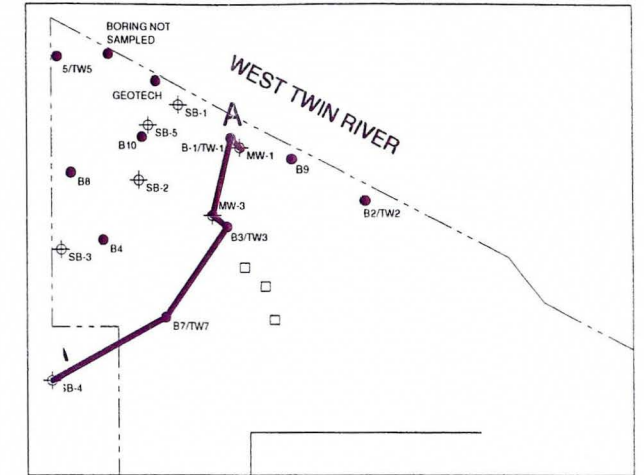
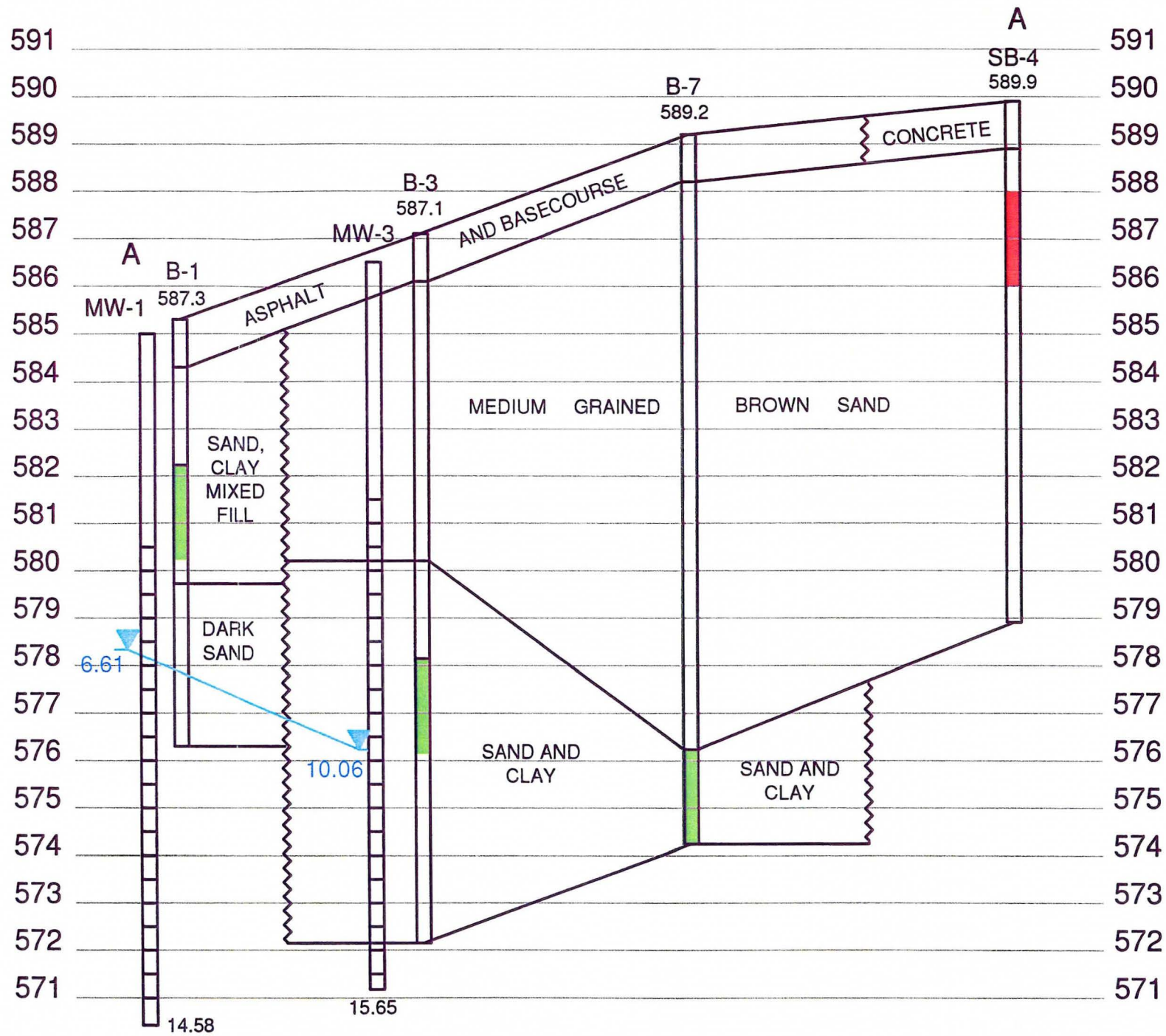
Depth (ft)	PPM								
	B-1	B-2	B-3	B-4	B-5	B-6	B-7	B-8	B-9
1-3	0	0	0	0	0	0.2	0	0	0
3-5	0.4	0	0	0	71	99	0	0	0
5-7	105	0	0	0.1	11	0.8	0	0	0
7-9	23	0	0	0	1.0	193	0	EOB	0
9-11	EOB	0	0	0	EOB	EOB	0		EOB
11-13		EOB	0	EOB			0		EOB
13-15			0				0		
			EOB				EOB		

**TABLE 4
SITE INVESTIGATION SOIL ANALYSIS**

Parameter	NR 720 Standard	B-1 (5-7')	B-2 (8-10')	B-3 (9-11')	B-4 (9-11')	B-5 (3-5')	B-7 (13-15')	B-8 (5-7')	B-9 (7-9')	B-10 (8-10')
		4/22/04	4/22/04	4/22/04	4/22/04	4/22/04	6/10/04	6/10/04	6/10/04	10/6/04
VOC (µg/kg)										
Ethylbenzene	2,900	36	<25	<25	<25	<25	<25	<25	<25	NA
Naphthalene	110,000	150	<25	79	<25	<25	<25	<25	<25	NA
n-Propylbenzene	—	180	<25	<25	<25	<25	<25	<25	<25	NA
Sec-Butylbenzene	—	41	<25	<25	<25	74	<25	<25	<25	NA
1,2,4-Trimethylbenzene	—	610	<25	<25	<25	<25	<25	<25	<25	NA
1,3,5-Trimethylbenzene	—	89	<25	<25	<25	<25	<25	<25	<25	NA
Total Xylene	4,100	162	<50	<50	<50	<50	<50	<50	<50	NA
PAH (µg/kg)										
1-Methylnaphthalene	1,100,000	NA	NA	NA	NA	NA	NA	NA	NA	3,600
2-Methylnaphthalene	600,000	NA	NA	NA	NA	NA	NA	NA	NA	5,700
Acenaphthene	900,000	NA	NA	NA	NA	NA	NA	NA	NA	23
Anthracene	5,000,000	NA	NA	NA	NA	NA	NA	NA	NA	48
Fluoranthene	600,000	NA	NA	NA	NA	NA	NA	NA	NA	190
Fluorene	600,000	NA	NA	NA	NA	NA	NA	NA	NA	53
Naphthalene	20,000	NA	NA	NA	NA	NA	NA	NA	NA	410
Phenanthrene	18,000	NA	NA	NA	NA	NA	NA	NA	NA	250

= NR 720 Table 1 Soil Standard Exceedance

NA = Not Analyzed



SCALE

VERTICAL 1" = 3'
 HORIZONTAL 1" = 30'

LEGEND

- BELOW NR720 SOIL STANDARDS
- NR720 SOIL STANDARD EXCEEDANCE
- GROUNDWATER LEVEL

EGGERS INDUSTRIES, INC.
 1702 13TH STREET
 TWO RIVERS, WISCONSIN

GEOLOGIC CROSS SECTION
 12/17/04

FIGURE 4

STATEMENT OF PROPERTY LEGAL DESCRIPTION

As required by s. NR 726.05(3) of the Wisconsin Administrative Code, I am providing this signed statement that to the best of my knowledge the attached legal description is complete and accurate for the property identified by the Wisconsin Department of Natural Resources BRRRTS #02-36-521430, located in Two Rivers, Wisconsin.



Signature

8-22-05

Date

Peter Prost

Name

Corp Env. Mgr

Title