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June 29, 2022

Mr. David Franc, PG
United States Environmental Protection Agency (USEPA)
Region 5
Mail Code: SR-6J
77 West Jackson Boulevard
Chicago, Illinois 60604-3507

Via Email: Franc.David@epa.gov

RE: 2022 Tecumseh Site – Revised Proposed Step-Out Soil Boring Locations
Sheboygan River and Inner Harbor Site
Tecumseh Products Company Site, Sheboygan Falls, Wisconsin
SME Project No. 069638.00.067

Dear Mr. Franc:

On behalf of Pollution Risk Services, LLC (PRS), SME is submitting the revised proposed Non-Time-Critical Removal Action (NTCRA) step-out boring information for supplemental investigation activities on the former Tecumseh Products Company Site (the Site) associated with Sheboygan River and Inner Harbor Superfund Site. These proposed step-out boring locations are designed to supplement sampling data from the 2021 soil sampling investigation results and further determine the extent of PCB-impacted soil on the Site. We request a review/approval of the proposed step-out boring locational and analyses by July 1, 2022 to facilitate completion of the sampling activities in mid-July. If approval is not provided by this date, sampling activities may need to be delayed into August.

The following provides our responses to your comments regarding the 2022 Proposed Step-Out Boring Locations in your letters dated April 22, 2022 and June 24, 2022.

EPA General Comment 1: *ROW sample locations that exceeded the 8.66 milligram per kilogram (mg/kg) industrial-commercial cleanup objective do not include proposed step-out locations. Adjacent Rochester Park exceedances are currently being addressed by the City of Sheboygan Falls under Wisconsin Department of Natural Resources (WDNR) oversight, and the recreational cleanup criteria being applied is much lower than previously anticipated (0.5 mg/kg). Therefore, it is recommended that ROW step-outs be completed and evaluated against the Site industrial-commercial cleanup criteria so that decisions regarding future ROW redevelopment can be evaluated.*

SME Response: The updated ROW sample locations include step-out soil borings at each of the ROW sample locations on the north side that exceed 8.66 mg/kg. Step-out sample locations in the roadway will be determined in the field according to safe boring locations between existing utilities (gas main, sanitary sewer and water line). If safe locations are not feasible at the planned distance of 15 feet to the north of the ROW sample cluster, the sample locations may be adjusted to the north side of the existing utilities. Step-out soil borings are planned on the east side of Hickory Street to evaluate soil conditions on the boundary of Rochester Park.

EPA Evaluation of Response: Please clarify whether proposed ROW step-out locations are 5-point composites or if they indicate one aliquot. In addition, SBP23 should have 15 feet and 30 feet step-outs as concentrations exceed the principal threat waste (PTW) criteria of 100 mg/kg. Provide rationale for not proposing 15 and 30 ft step outs to the north, west and east for PTW delineation.

SME Response to EPA Evaluation: As noted in Table 1, Proposed Step-out Sample Collection and Analysis, the proposed ROW samples will be discrete single aliquot samples. The previous composite samples evaluated the overall presence of PCBs in the ROW but since PCBs were found above the screening levels, discrete sampling is proposed to delineate the exceedances across the roadway. Step-out borings around SBP23 have been added 15 feet in the north, east and west directions to Figure 2 and Table 1. Previous soil borings (SBP4, S84E, and S85E) are located within 30 feet to the north and west and the Site boundary is located 30 feet to the east. If SBP23-1E does not delineate to the east 100 ppm, the nearby proposed SBP22-1S will represent the boundary condition of the Site.

EPA General Comment 2: *It would be helpful to include previous sampling results being used to demonstrate delineation on the figures provided. Suggest revising figures so that proposed step-out locations and rationale are clear.*

SME Response: The included revised figure includes previous sample locations from 2016 and 2021. Due to the large amount of analytical data and borings on the Site and limited space between borings on the figures, we have included an analytical table with total PCB results for each boring location and sample interval. We also included shading for areas with soil with PCBs above 8.66 ppm (surface soil and deeper soil) on Figures 1 and 2 of the Site. Pairing the figures and the data tables provides the boring delineation status. We apologize for this inconvenience.

EPA Evaluation of Response: Several locations in Figures 2 and 3 are shown with a green circle around the boring legend (for example – DP4, DP6, SBP13 in Figure 2). For clarity, please add legend description to indicate what the green circle means.

SME Response to EPA Evaluation: The green circle is an accidental artifact from the previous SAP where the green circle indicated soil boring locations where additional geotechnical information was also being collected during the sampling. The circles have been removed.

EPA General Comment 3: *Per the sampling rationale stated in the Sampling and Analysis Plan (SAP), sample collection was targeted to depths where groundwater is encountered. This was expected to be in the range of 8 feet below ground surface (bgs). It is not clear if groundwater was encountered within 8 feet of the ground surface at the above locations where vertical delineation was not achieved. Additional sampling is recommended for locations where groundwater was not encountered.*

SME Response: Generally, groundwater was expected to not extend deeper than 8 feet bgs across the site. Groundwater encountered in the soil borings ranged from 5 feet to 7.5 feet bgs. Sample collection was completed to the depth of encountered groundwater; however, at several locations groundwater was not encountered to 8 feet bgs. At these locations, additional sampling will be conducted to extend soil sampling to the depth of groundwater (see SME Response to EPA Specific Comment Dewatering Pad 2(a)).

EPA Specific Comment Western Parking Lot 1(a): *Please complete proposed step-out locations identified around PL2.*

SME Response: We will complete the proposed step-out locations around PL-2.

EPA Specific Comment Dewatering Pad 2(a): *Vertical delineation of total polychlorinated biphenyls (PCB) exceedance was not achieved at six locations: DP-1, DP-5, DP-12, DP-13, DP-14, and DP-34. Four of the six locations exceed principal threat waste (PTW) criteria in the deepest sample interval.*

SME Response: Sample collection was completed to the encountered depth of groundwater at locations DP12 and DP13; therefore, additional sampling at these locations was not targeted. Sample collection was completed to the extent of expected groundwater (8 feet bgs) at soil borings DP1, DP5, DP14 and DP34; however, groundwater was not encountered to 8 feet bgs. We will complete supplemental borings at DP1, DP5, DP14 and DP34 to collect soil samples from 8 feet bgs to the depth of the encountered groundwater.

EPA Evaluation of Response: Per EPA Specific Comment 2(a) and SME response, supplemental borings are proposed at DP1, DP5, DP14 and DP34 to complete vertical delineation of PCB exceedance to encountered groundwater depth. Please show locations to be resampled in Figure 2 and Table 1.

SME Response to EPA Evaluation: The resample locations were included in Table 1 as DP1A, DP5A, DP14A, and DP34A. Figure 2 has been revised to show the secondary names and an additional proposed boring symbol for ease of locating.

EPA Specific Comment Eastern Portion 3(a): *Many of the locations exceed industrial-commercial and PTW criteria. However, step-outs are not proposed in accordance with the SAP. For example, SBP22 has no proposed step-outs. SBP23, SBP24, and SBP25 have proposed step-outs inconsistent with the SAP (should have 15-ft step-outs in each cardinal direct not delineated yet). Please include step-outs for all sampling locations in accordance with SAP or provide rationale for their exclusion.*

SME Response: The updated sample locations along the southeast portion of the Property include selected step-out borings at each of the above noted locations. Additional step-out boring locations at SBP22, SBP23 and SBP24 were located along the southeastern boundary of the Site with Rochester Park, which is being addresses by the City of Sheboygan Falls, to determine soil conditions at the boundary. The additional step-out boring at SBP25 is to determine the southern extent of PCB-impacted soil in this area.

EPA Specific Comment Eastern Portion 3(b): *Vertical delineation of total PCB exceedance was not achieved at six locations: SBP6-1E, SBP6-1S, SBP-16, SBP-17, SBP-18, and BP3-1S. Two of the six locations exceed PTW criteria in the deepest sample interval.*

SME Response: Groundwater encountered in the soil borings ranged from 6 feet to 7.5 feet bgs in the noted locations. Sample collection was completed to the depth of encountered groundwater.

EPA Specific Comment ROW 4(a): *Please complete step-outs to address exceedances detected at ROW2 and ROW3.*

SME Response: The updated ROW sample locations include step-out soil borings at ROW2 and ROW3.

EPA Specific Comment ROW 4(b): *Delineation of PTW may be required between DP1 and ROW2 (unclear if previous sampling in this area is sufficient).*

SME Response: Previous borings located north of DP1 identified PCBs at concentrations up to 1,000 ppm. This area of the Site is planned to be excavated to 4 feet bgs. We will complete two additional borings in this area to further evaluate contamination limits.

EPA Evaluation of Response: Per SME response to EPA Specific Comment 4(b) on insufficient characterization between borings DP1 and ROW2, SME plans to collect two additional borings. Please add these borings to Figure 2 and Table 1.

SME Response to EPA Evaluation: Two additional borings (ROW2-1SW and ROW2-2SW) were already added to Figure 2 and Table 1; however, we have added two more additional borings (S15-2NA and S16A) to further evaluate vertical extent at these locations. These borings were added to collect additional soil data in the area between DP1 and ROW2 where limited or no previous sampling was completed.

EPA Specific Comment ROW 4(c): *Many of the locations exceed industrial-commercial and PTW criteria. However, step-outs are not proposed in accordance with the SAP. For example, the proposed step-outs along the driveway for ROW7, BP3-1N, and BP3-1S have proposed step-outs inconsistent with the SAP (should have 15-ft step-outs in each cardinal direct not-delineated yet). Please include step-outs for all sampling locations in accordance with SAP or provide rationale for their exclusion.*

SME Response: The updated ROW and BP sample locations along the Hickory Street ROW were selected to evaluate the southern and northern extent of PCB-impact along the east side of Hickory Street and soil conditions at the boundary of Rochester Park.

If you have questions regarding this report, feel free to contact Keith Egan at (513) 319-8919 or via email at keith.egan@sme-usa.com.

Respectfully,

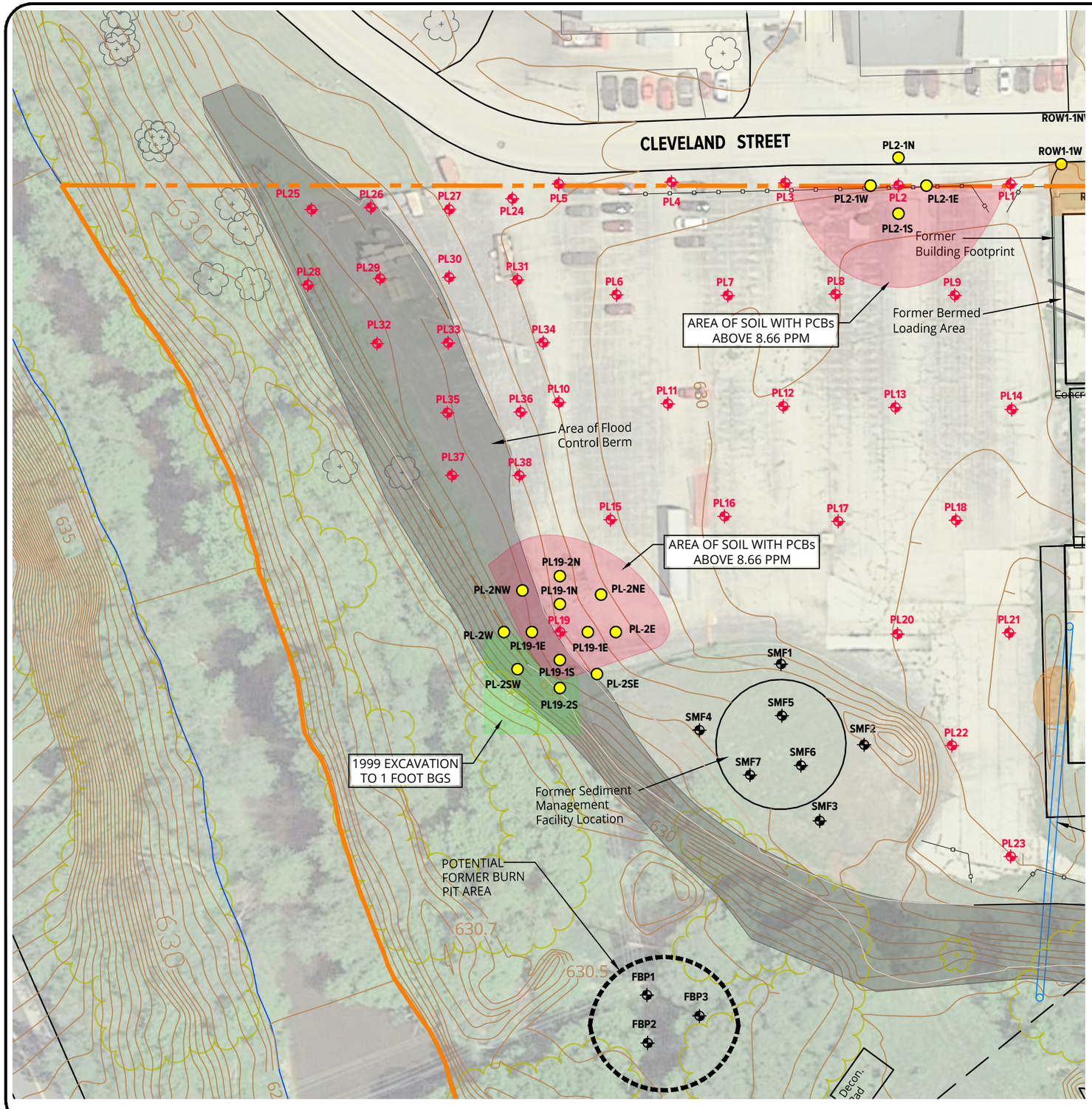
SME

Aaron J. Lammers, EIT
Project Engineer

Keith B. Egan, CP #259
Chief Consultant

Attachments:
Figure 1: Proposed Western Parking Lot Step-out Sample Locations
Figure 2: Proposed Dewatering Pad/R.O.W. Borings/Eastern Portion Of Site Step-Out Sample Locations
Figure 3: Proposed Right-Of-Way (ROW) Step-Out Sample Locations
Table 1: Proposed Step-out Sample Collection and Analyses
Table 2: Summary of PCB Analysis Results

Distribution:
Ms. Debbie McMillan, PRS via email (dmcmillan@grhdevelopment.com)
Mr. Peter Johnson, Johnson-Wright via email (pjohnson@johnsonwright.net)
Mr. Jason Smith, Tecumseh via email (jason.smith@tecumseh.com)
Mr. Chris Dietrich, Wisconsin Department of Natural Resources via email (christopher.dietrich@wisconsin.gov)



N
W E
S

0' 60' 120'

GRAPHIC SCALE: 1" = 60'

LEGEND

- APPROXIMATE SITE BOUNDARY
- EXISTING FENCE
- SOIL SAMPLE LOCATION
- EXISTING TREE AND/OR BRUSH
- SITE CONTOURS
- FLOOD CONTROL BERM
- DEWATERING PAD
- DATA GAP #1 BORINGS
- PROPOSED SOIL BORING LOCATION

NOTES:

1. BASE DRAWING INFORMATION TAKEN FROM GOOGLE EARTH PRO WITH IMAGE DATE 6-1-2015 AND STORMWATER POLLUTION PREVENTION PLAN, BY PETRO ENVIRONMENTAL, LLC, DATED SEPTEMBER 2004.
2. INCLUDED IN THE REMEDIAL ACTION WORK PLAN, UPPER RIVER - PHASE 1, DATED SEPTEMBER 2004.

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Project
SHEBOYGAN RIVER SUPERFUND SITE

Project Location
FORMER TECUMSEH SITE SHEBOYGAN FALLS, WISCONSIN

Sheet Name
WESTERN PARKING LOT AND POTENTIAL BURN PIT STEP-OUT SAMPLE LOCATIONS

No.	Revision Date

Date: 6/28/2022
CADD: JAB
Designer: KE/AJL
Scale: AS NOTED
Project: 069638.00.067
Figure No.: 1

PLOT DATE: Jun 29, 2022 - 9:21am - julie.blake
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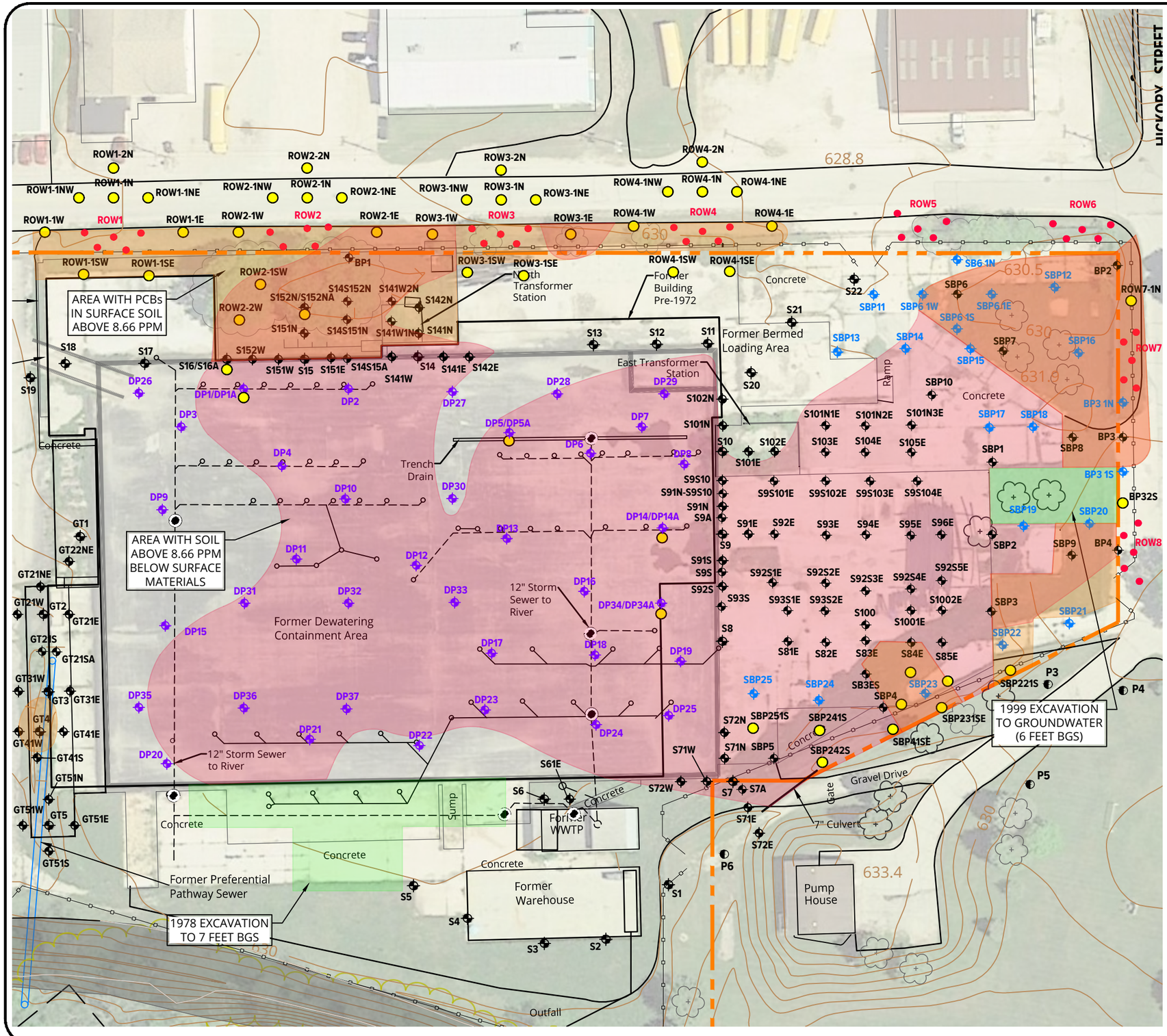

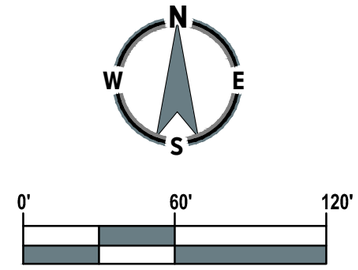

LEGEND

- APPROXIMATE SITE BOUNDARY
- EXISTING FENCE
- DRAIN PRE-1978
- DRAIN 1978-1992
- MANHOLE
- MACHINE DRAIN
- EXISTING TREE AND/OR BRUSH
- SITE CONTOURS
- FLOOD CONTROL BERM
- DEWATERING PAD
- SOIL SAMPLE LOCATION
- RUN-OFF SAMPLE LOCATION
- DATA GAP #2 BORINGS
- DATA GAP #3 BORINGS
- R.O.W. COMPOSITE BORING
- PROPOSED SOIL BORING LOCATION

NOTES:

1. BASE DRAWING INFORMATION TAKEN FROM GOOGLE EARTH PRO WITH IMAGE DATE 6-1-2015 AND STORMWATER POLLUTION PREVENTION PLAN, BY PETRO ENVIRONMENTAL, LLC, DATED SEPTEMBER 2004.
2. INCLUDED IN THE REMEDIAL ACTION WORK PLAN, UPPER RIVER - PHASE 1, DATED SEPTEMBER 2004.

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Project
SHEBOYGAN RIVER SUPERFUND SITE

Project Location
FORMER TECUMSEH SITE SHEBOYGAN FALLS, WISCONSIN

Sheet Name
DEWATERING PAD/ R.O.W. BORINGS/ EASTERN PORTION OF SITE STEP-OUT SAMPLE LOCATIONS

No.	Revision Date

Date 6/28/2022
CADD JAB
Designer KE/AJL
Scale AS NOTED
Project 069638.00.067
Figure No. 2

PLOT DATE: Jun 29, 2022 - 9:20am - julie.blake
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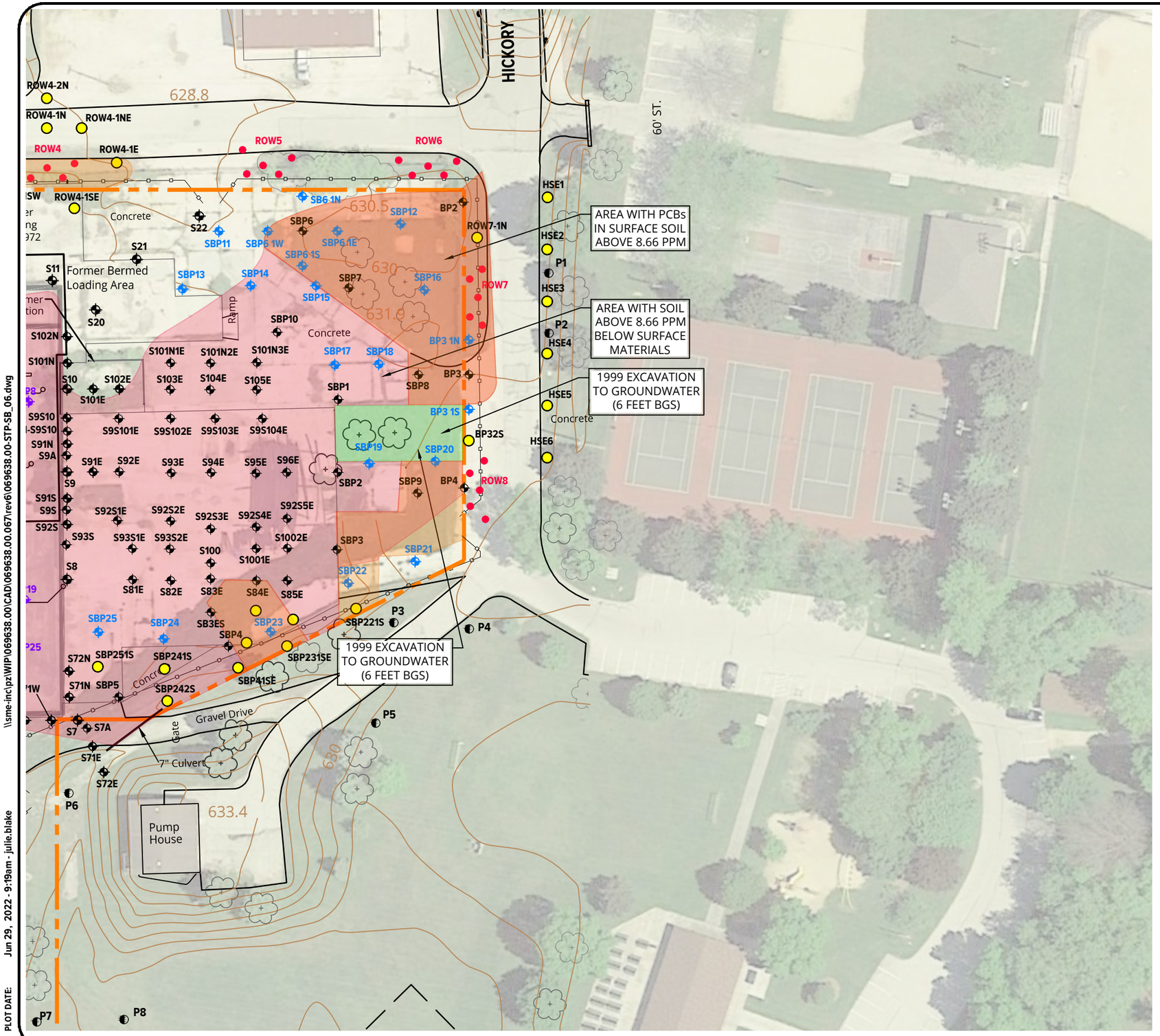

LEGEND

- APPROXIMATE SITE BOUNDARY
- EXISTING FENCE
- DRAIN PRE-1978
- DRAIN 1978-1992
- MANHOLE
- MACHINE DRAIN
- EXISTING TREE AND/OR BRUSH
- SITE CONTOURS
- FLOOD CONTROL BERM
- DEWATERING PAD
- SOIL SAMPLE LOCATION
- RUN-OFF SAMPLE LOCATION
- DATA GAP #2 BORINGS
- DATA GAP #3 BORINGS
- R.O.W. COMPOSITE BORING
- PROPOSED SOIL BORING LOCATION

NOTES:

1. BASE DRAWING INFORMATION TAKEN FROM GOOGLE EARTH PRO WITH IMAGE DATE 6-1-2015 AND STORMWATER POLLUTION PREVENTION PLAN, BY PETRO ENVIRONMENTAL, LLC, DATED SEPTEMBER 2004.
2. INCLUDED IN THE REMEDIAL ACTION WORK PLAN, UPPER RIVER - PHASE 1, DATED SEPTEMBER 2004.

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Project
SHEBOYGAN RIVER SUPERFUND SITE

Project Location
FORMER TECUMSEH SITE SHEBOYGAN FALLS, WISCONSIN

Sheet Name
ADDITIONAL RIGHT-OF-WAY (ROW) STEP-OUT SAMPLE LOCATIONS

No.	Revision Date

Date	6/28/2022
CADD	JAB
Designer	KE/AJL
Scale	AS NOTED
Project	069638.00.067
Figure No.	3

PLOT DATE: Jun 29, 2022 - 9:19am - julie.blake
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TABLE 1

PROPOSED STEP-OUT
SAMPLE COLLECTION AND ANALYSES
SHEBOYGAN SUPERFUND SITE
TECUMSEH SITE
SHEBOYGAN FALLS, WISCONSIN
SME Project No. 069638.00.067

Sample Target	Sample ID	Number of Locations	Maximum Boring Depth (feet bgs)	Boring Type	Target Sample		Media	ANALYTES	
					Sample Depth (feet bgs)	Rationale		PCBs[1]	
								ANALYZED	ARCHIVED
Delineation of PL2	PL2-1N, PL2-1E PL2-1S, PL2-1W	4	4	Discrete	**0 - 0.5**[2] 0.5 - 2 *2 - 4*	Delineation of PCBs-impact in PL2 per SAP 15 feet in cardinal directions	Soil	4	8
Delineation of PL19	PL19-1N, PL19-1E PL19-1S, PL19-1W	4	4	Discrete	**0 - 0.5**[2] **0.5 - 2** *2 - 4*	Delineation of PCBs-impact in PL2 per SAP 15 feet in cardinal directions	Soil	8	4
Delineation of PL19 (if needed)	PL19-2N, PL19-2NE PL19-2E, PL19-2SE PL19-2S, PL19-2SW PL19-2W, PL19-2NW	8	4	Discrete	*0 - 0.5* *0.5 - 2* *2 - 4*	Additional sampling if PL19-1X samples exceed commercial/industrial screening levels.	Soil	0	24
Vertical Delineation of PTW in the Dewatering Pad area	DP1A, DP5A, DP14A, DP34A	4	12*	Discrete	***8 - 10*** ***10 - 12***	Extending previous borings to depth of encountered groundwater.	Soil	8	0
Northern ROW1 boring delineation	ROW1-1NW, ROW1-1N, ROW1-1NE, ROW1-1E, ROW1-1SE, ROW1-1SW, ROW1-W, ROW1-2N	8	12*	Discrete	**0 - 0.5**[2] **0.5 - 2** ***2 - 4*** ***4 - 6*** ***6 - 8*** *8 - 10* *10 - 12*	Delineation of PCBs-impact near ROW1 on the site, in the roadway and across the street.	Soil	40	16
Northern ROW2 boring delineation	ROW2-1NW, ROW2-N, ROW2-1NE, ROW2-1E, ROW2-W, ROW2-2N	6	12*	Discrete	**0 - 0.5**[2] **0.5 - 2** ***2 - 4*** ***4 - 6*** ***6 - 8*** *8 - 10* *10 - 12*	Delineation of PCBs-impact near ROW2 on the site, in the roadway and across the street.	Soil	30	12
Northern ROW3 boring delineation	ROW3-1NW, ROW3-1N, ROW3-1NE, ROW3-1E, ROW3-1SE, ROW3-1SW, ROW3-W, ROW3-2N	8	12*	Discrete	**0 - 0.5**[2] **0.5 - 2** ***2 - 4*** ***4 - 6*** ***6 - 8*** *8 - 10* *10 - 12*	Delineation of PCBs-impact near ROW3 on the site, in the roadway and across the street.	Soil	40	21
Northern ROW4 boring delineation	ROW4-1NW, ROW4-1N, ROW3-1NE, ROW3-1E, ROW3-1SE, ROW3-1SW, ROW3-W, ROW3-2N	8	12*	Discrete	**0 - 0.5**[2] **0.5 - 2** ***2 - 4*** ***4 - 6*** ***6 - 8*** *8 - 10* *10 - 12*	Delineation of PCBs-impact near ROW4 on the site, in the roadway and across the street.	Soil	35	16
Eastern ROW7 boring delineation	ROW7-1N	1	8*	Discrete	**0 - 0.5**[2] **0.5 - 2** ***2 - 4*** ***4 - 6*** ***6 - 8***	Delineation of PCBs-impact in ROW1 on the site, in the roadway and across the street.	Soil	5	0
Area between ROW2 and DP1 delineation	ROW2-1SW, ROW2-2SW, S16A S152NA	4	12*	Discrete	**0 - 0.5**[2] **0.5 - 2** ***2 - 4*** ***4 - 6*** ***6 - 8*** *8 - 10* *10 - 12*	Delineation of PCBs-impact between ROW2 and DP1.	Soil	20	8
BP31S boring delineation	DP3-2S	1	8*	Discrete	**0 - 0.5**[2] **0.5 - 2** ***2 - 4*** ***4 - 6*** ***6 - 8***	Delineation of PCBs-impact in ROW1 on the site, in the roadway and across the street.	Soil	5	0
SBP23 boring delineation	SBP23-1N SBP23-1W SBP23-1E	6	8*	Discrete	**0 - 0.5**[2] **0.5 - 2** ***2 - 4*** *4 - 6* *6 - 8*	Delineation of PCBs-impact to the Site southern boundary in the southeastern portion of the Site.	Soil	18	12
Southern Park boundary conditions evaluation	SBP22-1S SBP23-1SE SBP4-1SE SBP24-1S SBP24-2S SBP25-1S	6	8*	Discrete	**0 - 0.5**[2] **0.5 - 2** ***2 - 4*** *4 - 6* *6 - 8*	Delineation of PCBs-impact to the Site southern boundary in the southeastern portion of the Site.	Soil	18	12
East side of Hickory Street ROW conditions evaluation	HSE-1 to HSE-6	6	8*	Discrete	**0 - 0.5** **0.5 - 2** ***2 - 4*** *4 - 6* *6 - 8*	Delineation of PCBs-impact to the east side of Hickory Street.	Soil	18	12
SUBTOTALS	Number of Borings	74				Soil Samples Collected		249	145

QC SAMPLES	Equipment Blank	Soil	13	0
	Field Duplicate	Soil	13	0
	Subtotal Soil QC Samples	Soil	26	0

TOTAL SAMPLES	**All**	**275**	**145**
	All	**420**	

TABLE 1

PROPOSED STEP-OUT
SAMPLE COLLECTION AND ANALYSES
SHEBOYGAN SUPERFUND SITE
TECUMSEH SITE
SHEBOYGAN FALLS, WISCONSIN
SME Project No. 069638.00.067

NOTES:

1. PCBs - polychlorinated
2. Sampling intervals with gravel, concrete or asphalt will be adjusted to begin below the gravel, concrete or asphalt. The surficial sample interval (0'-0.5') may not collected if the gravel, concrete or asphalt thickness is greater than 6-inches. If the surficial sample interval is not collected, the first collected soil interval will be analyzed and additional subsurface samples will be adjusted accordingly.
3. QC sample frequency: Equipment Blank, Field Duplicate = 1 per 20 samples or at least 1 per day (estimated 5 days overall)
4. Sample intervals in **BOLD** will be initially analyzed. Sample intervals in *italics* will be archived for potential analyses.
5. * Depth of borings to extend to depth of encountered groundwater

TABLE 2
SUMMARY OF PCB ANALYSIS RESULTS - 2016-2018 SOIL
TECUMSEH SITE
SHEBOYGAN FALLS, WI
069638.00.051

ANALYTE	Chemical Abstract Service Number	CLEANUP GOALS	SAMPLE INFORMATION	CHEMICAL ANALYSES RESULTS (mg/kg)													
		Remedial Action Plan Cleanup Goal Commercial (mg/kg)	SAMPLE LOCATION	S1	S2	S3	S4	S5	S6	S6	S6	S6-1E	S7	S7	S7	S7A	S7A
			SAMPLE DEPTH (FEET BGS)	0 - 0.5'	0 - 0.5'	0 - 0.5'	0.33' - 0.83'	0 - 0.5'	0 - 0.5'	0.5' - 1.5'	1.5' - 3.5'	0 - 0.5'	0 - 0.5'	0.5' - 1.5'	1.5' - 3.5'	4 - 6	6 - 7
			SAMPLE DATE	9/28/2016	9/28/2016	9/28/2016	9/28/2016	9/28/2016	9/28/2016	9/28/2016	9/28/2016	11/10/2016	9/28/2016	9/28/2016	9/28/2016	5/9/2018	5/9/2018
PCBs																	
PCB, Total	1336-36-3	8.66		**4.75**	**0.75**	**0.83**	**0.49**	**0.18**	**6.73**	NA	NA	NA	**18**	**426**	**55**	**0.07**	<0.030

ANALYTE	Chemical Abstract Service Number	CLEANUP GOALS	SAMPLE INFORMATION	CHEMICAL ANALYSES RESULTS (mg/kg)													
		Remedial Action Plan Cleanup Goal Commercial (mg/kg)	SAMPLE LOCATION	S7-1N	S7-2N	S7-2W	S7-2SE	S8	S9	DUP-SOIL 4	S9	DUP-SOIL 5	S9	DUP-SOIL 6	S9A	S9A	S9-1N
			SAMPLE DEPTH (FEET BGS)	0.66' - 1.16'	1.25' - 1.75'	0 - 0.5'	0 - 0.5'	0.33' - 0.83'	0.5 - 1'	S9 (0.5'-1')	1' - 2'	S9 (1' - 2')	2' - 4'	S9 (2' - 4')	4.5 - 6.5	6.5 - 8.5	0.5' - 1'
			SAMPLE DATE	11/10/2016	11/10/2016	11/10/2016	11/10/2016	9/28/2016	9/28/2016	9/28/2016	9/28/2016	9/28/2016	9/28/2016	9/28/2016	5/8/2018	5/8/2018	11/10/2016
PCBs																	
PCB, Total	1336-36-3	8.66		NA	**4.50**	**5.61**	**0.69**	**2.72**	**9,060**	**11,200**	**5,430**	**5,820**	**513**	**1,050**	**2.26**	**2.39**	**525**

ANALYTE	Chemical Abstract Service Number	CLEANUP GOALS	SAMPLE INFORMATION	CHEMICAL ANALYSES RESULTS (mg/kg)													
		Remedial Action Plan Cleanup Goal Commercial (mg/kg)	SAMPLE LOCATION	S9-1N	S9-1N	S9-1E	S9-1E	S9-1E	S9-2E	S9-2E	S9-2E	S9-2EA	S9-2EA	Duplicate Soil - 3	S9-1S	S9-1S	S9-1S
			SAMPLE DEPTH (FEET BGS)	1' - 2'	2' - 4'	0.5' - 1'	1' - 2'	2' - 4'	0.5' - 1'	1' - 2'	2' - 4'	4.5 - 6.5	6.5 - 8.5	S9-2EA (6.66-8.66)	0.5' - 1'	1' - 2'	2' - 4'
			SAMPLE DATE	11/10/2016	11/10/2016	11/10/2016	11/10/2016	11/10/2016	11/10/2016	11/10/2016	11/10/2016	5/8/2018	5/8/2018	5/8/2018	11/10/2016	11/10/2016	11/10/2016
PCBs																	
PCB, Total	1336-36-3	8.66		**2,090**	**661**	**15,200**	**5,360**	**1,570**	**7,180**	**3,720**	**10**	**266**	**19**	**3.64**	**223**	**2,030**	**470**

ANALYTE	Chemical Abstract Service Number	CLEANUP GOALS	SAMPLE INFORMATION	CHEMICAL ANALYSES RESULTS (mg/kg)													
		Remedial Action Plan Cleanup Goal Commercial (mg/kg)	SAMPLE LOCATION	S9-2S	S9-2S	S9-2S	S9-1S-S9-2S	S9-1S-S9-2S	S9-1S-S9-2S	Duplicate Soil- 2	S9-1S-S9-2S	S9-2S-1E	S9-2S-1E	S9-2S-1E	S9-2S-1E	S9-2S-1E	S9-2S-1E
			SAMPLE DEPTH (FEET BGS)	0.5' - 1'	1' - 2'	2' - 4'	4.66 - 6.66	6.66 - 8.66	8.66 - 10.66	S9-1S-S9-2S (8.66 - 10.66)	10.66 - 11.16	0.5 - 1	1 - 2..5	2.5 - 4.5	4.5 - 6.5	6.5 - 8.5	8.5 - 10.5
			SAMPLE DATE	11/10/2016	11/10/2016	11/10/2016	5/9/2018	5/9/2018	5/9/2018	5/9/2018	5/9/2018	5/9/2018	5/8/2018	5/8/2018	5/8/2018	5/8/2018	5/8/2018
PCBs																	
PCB, Total	1336-36-3	8.66		**102**	**1,200**	**90**	**13**	**12**	**0.78**	**0.48**	<0.043	**14**	**1,050**	**7.88**	**65**	**9**	**0.30**

PCBs - Polychlorinated Biphenyls.
Results above RL are shown in **bold**. Results exceeding one or more criteria are shaded, as are the criteria which were exceeded.
Refer to the analytical report for the full list of PCB analytes.

TABLE 2
SUMMARY OF PCB ANALYSIS RESULTS - 2016-2018 SOIL
TECUMSEH SITE
SHEBOYGAN FALLS, WI
069638.00.051

ANALYTE	Chemical Abstract Service Number	CLEANUP GOALS	SAMPLE INFORMATION	CHEMICAL ANALYSES RESULTS (mg/kg)													
		Remedial Action Plan Cleanup Goal Commercial (mg/kg)	SAMPLE LOCATION	S9-2S-1E	S9-2S-2E	S9-2S-2E	S9-2S-2E	S9-2S-2E	S9-2S-2E	S9-2S-2E	S9-2S-2E	S9-2S-3E	S9-2S-3E	S9-2S-3E	S9-2S-3E	S9-2S-4E	S9-2S-4E
			SAMPLE DEPTH (FEET BGS)	10.5 - 12.5	0.66 - 1.16	1.16 - 2.66	2.66 - 4.66	4.66 - 6.66	6.66 - 8.66	8.66 - 10.66	10.66 - 11.16	0.66 - 2.66	2.66 - 4.66	4.66 - 6.66	6.66 - 8.66	0.66 - 2.66	2.66 - 4.66
			SAMPLE DATE	5/8/2018	5/8/2018	5/8/2018	5/8/2018	5/8/2018	5/8/2018	5/8/2018	5/8/2018	5/9/2018	5/9/2018	5/9/2018	5/9/2018	5/9/2018	5/9/2018
PCBs																	
PCB, Total	1336-36-3	8.66		**0.08**	**16**	**3.81**	**1.21**	**2,400**	**184**	**0.56**	<0.0404	**6.97**	**0.22**	**199**	**5.86**	**35**	**0.21**

ANALYTE	Chemical Abstract Service Number	CLEANUP GOALS	SAMPLE INFORMATION	CHEMICAL ANALYSES RESULTS (mg/kg)													
		Remedial Action Plan Cleanup Goal Commercial (mg/kg)	SAMPLE LOCATION	S9-2S-4E	S9-2S-4E	Duplicate Soil - 6	S9-3S	S9-3S	S9-3S	S9-3S	S9-3S	S9-3E	S9-3E	S9-3E	S9-3E	S9-3E	S9-4E
			SAMPLE DEPTH (FEET BGS)	4.66 - 6.66	6.66 - 8.66	S9-2S-4E (6.66 - 8.66)	0.66 - 1.16	1.16 - 2.66	2.66 - 4.66	4.66 - 6.66	6.66 - 7.66	0.66 - 1.16	1.16 - 2.66	2.66 - 4.66	4.66 - 6.66	6.66 - 8.66	0.66 - 1.16
			SAMPLE DATE	5/9/2018	5/9/2018	5/9/2018	5/9/2018	5/9/2018	5/9/2018	5/9/2018	5/9/2018	5/8/2018	5/8/2018	5/8/2018	5/8/2018	5/8/2018	5/8/2018
PCBs																	
PCB, Total	1336-36-3	8.66		**14**	**204**	**155**	**5.23**	**10**	**155**	**396**	**29**	**6.82**	**3.22**	**50**	**0.04**	**96**	**0.53**

ANALYTE	Chemical Abstract Service Number	CLEANUP GOALS	SAMPLE INFORMATION	CHEMICAL ANALYSES RESULTS (mg/kg)													
		Remedial Action Plan Cleanup Goal Commercial (mg/kg)	SAMPLE LOCATION	S9-4E	S9-4E	S9-4E	S9-4E	S9-5E	S9-5E	S9-5E	S9-5E	S9-5E	S9-6E	S9-6E	S9-6E	S9-S10	S9-S10
			SAMPLE DEPTH (FEET BGS)	1.16 - 2.66	2.66 - 4.66	4.66 - 6.66	6.66 - 8.66	0.66 - 1.16	1.16 - 2.66	2.66 - 4.41	4.66 - 6.66	6.66 - 8.66	0.66 - 2.66	4.66 - 6.66	6.66 - 8.66	0.5' - 1'	1' - 2'
			SAMPLE DATE	5/8/2018	5/8/2018	5/8/2018	5/8/2018	5/8/2018	5/8/2018	5/8/2018	5/8/2018	5/8/2018	5/9/2018	5/9/2018	5/9/2018	11/10/2016	11/10/2016
PCBs																	
PCB, Total	1336-36-3	8.66		**1.66**	**6,450**	**1.29**	**0.12**	**3.03**	**3.69**	**256**	**8,740**	**18**	**0.14**	**1.39**	**0.34**	**6,270**	**6,640**

ANALYTE	Chemical Abstract Service Number	CLEANUP GOALS	SAMPLE INFORMATION	CHEMICAL ANALYSES RESULTS (mg/kg)													
		Remedial Action Plan Cleanup Goal Commercial (mg/kg)	SAMPLE LOCATION	S9-S10	S9-1N-S9S10	S9-1N-S9S10	Duplicate Soil - 4	S9-1N-S9S10	S9-S10-1E	S9-S10-1E	S9-S10-1E	S9-S10-1E	S9-S10-1E	S9-S10-1E	S9-S10-2E	S9-S10-2E	S9-S10-2E
			SAMPLE DEPTH (FEET BGS)	2' - 4'	4.66 - 6.66	6.66 - 8.66	S9-1N-S9S10 (6.66-8.66)	8.66 - 10.66	0.66 - 1.16	1.16 - 2.66	2.66 - 4.66	4.66 - 6.66	6.66 - 8.66	8.66 - 9.66	0.66 - 1.16	1.16 - 2.66	2.66 - 4.66
			SAMPLE DATE	11/10/2016	5/8/2018	5/8/2018	5/8/2018	5/8/2018	5/8/2018	5/8/2018	5/8/2018	5/8/2018	5/8/2018	5/8/2018	5/8/2018	5/8/2018	5/8/2018
PCBs																	
PCB, Total	1336-36-3	8.66		**6,840**	**8,690**	**7,580**	**11,600**	**6,430**	**44**	**348**	1.52	0.13	0.04	**172**	7.31	**205**	**9**

PCBs - Polychlorinated Biphenyls.
Results above RL are shown in **bold**. Results exceeding one or more criteria are shaded, as are the criteria which were exceeded.
Refer to the analytical report for the full list of PCB analytes.

TABLE 2
SUMMARY OF PCB ANALYSIS RESULTS - 2016-2018 SOIL
TECUMSEH SITE
SHEBOYGAN FALLS, WI
069638.00.051

ANALYTE	Chemical Abstract Service Number	CLEANUP GOALS	SAMPLE INFORMATION	CHEMICAL ANALYSES RESULTS (mg/kg)													
		Remedial Action Plan Cleanup Goal Commercial (mg/kg)	SAMPLE LOCATION	S9-S10-2E	S9-S10-2E	S9-S10-3E	S9-S10-3E	S9-S10-3E	S9-S10-3E	S9-S10-4E	S9-S10-4E	S9-S10-4E	S10	S10	S10	S10-1N	S10-2N
			SAMPLE DEPTH (FEET BGS)	4.66 - 6.66	6.66 - 8.66	0.66 - 2.66	2.66 - 4.66	4.66 - 6.66	6.66 - 8.66	0.66 - 2.66	4.66 - 6.66	6.66 - 8.66	0 - 0.5'	0.5' - 1.5'	1.5' - 3.5'	0 - 0.5'	0.5 - 1'
			SAMPLE DATE	5/8/2018	5/8/2018	5/9/2018	5/9/2018	5/9/2018	5/9/2018	5/9/2018	5/9/2018	5/9/2018	9/28/2016	9/28/2016	9/28/2016	11/10/2016	11/10/2016
PCBs																	
PCB, Total	1336-36-3	8.66		0.11	0.13	4.24	117	9	0.18	1.96	1.83	0.10	25	11	7.28	8.48	3.10

ANALYTE	Chemical Abstract Service Number	CLEANUP GOALS	SAMPLE INFORMATION	CHEMICAL ANALYSES RESULTS (mg/kg)													
		Remedial Action Plan Cleanup Goal Commercial (mg/kg)	SAMPLE LOCATION	S10-1E	S10-2E	S11	S12	S13	S14	S14	S14	S14-1N	S14-2N	S100	S100	Duplicate Soil - 7	S100
			SAMPLE DEPTH (FEET BGS)	0.5' - 1'	0.5' - 1'	1.5' - 2'	0.25' - 0.75'	0.5' - 1'	0 - 0.5'	0.5' - 1.5'	1.5' - 3.5'	0 - 0.5'	0 - 0.5'	0.66 - 2.66	4.66 - 6.66	S100 (4.66 - 6.66)	6.66 - 8.66
			SAMPLE DATE	11/10/2016	11/10/2016	9/28/2016	9/28/2016	9/28/2016	9/28/2016	9/28/2016	9/28/2016	11/10/2016	11/10/2016	5/9/2018	5/9/2018	5/9/2018	5/9/2018
PCBs																	
PCB, Total	1336-36-3	8.66		0.99	0.33	0.58	5.79	5.98	100	0.19	0.06	1.57	2.33	534	68	105	0.31

ANALYTE	Chemical Abstract Service Number	CLEANUP GOALS	SAMPLE INFORMATION	CHEMICAL ANALYSES RESULTS (mg/kg)													
		Remedial Action Plan Cleanup Goal Commercial (mg/kg)	SAMPLE LOCATION	S14-1E	S14-1E	S14-1E	S14-2E	S14-2E	S14-2E	S14-1W	S14-1W	S14-1W	S14-S15	S14-S15	S14-S15	S14-S15A	S14-S15A
			SAMPLE DEPTH (FEET BGS)	0.5' - 1'	1' - 2'	2' - 4'	0.5' - 1'	1' - 2'	2' - 4'	0 - 0.5'	0.5' - 1.5'	1.5' - 3.5'	0 - 0.5'	0.5' - 1.5'	1.5' - 3.5'	4 - 6	6 - 8
			SAMPLE DATE	11/10/2016	11/10/2016	11/10/2016	11/10/2016	11/10/2016	11/10/2016	11/10/2016	11/10/2016	11/10/2016	11/10/2016	11/10/2016	11/10/2016	5/7/2018	5/7/2018
PCBs																	
PCB, Total	1336-36-3	8.66		24	16	0.56	19	12	0.03	151	22	0.72	878	616	791	0.94	62

ANALYTE	Chemical Abstract Service Number	CLEANUP GOALS	SAMPLE INFORMATION	CHEMICAL ANALYSES RESULTS (mg/kg)													
		Remedial Action Plan Cleanup Goal Commercial (mg/kg)	SAMPLE LOCATION	S14-S15A	S14-S15A-1N	S14-S15A-1N	S14-S15A-1N	S15	S15	S15	S15-1N	S15-2N	S15-1E	S15-1E	S15-1E	S15-1W	S15-1W
			SAMPLE DEPTH (FEET BGS)	8 - 10	0 - 2	4 - 6	6 - 8	0 - 0.5'	0.5' - 1.5'	1.5' - 3.5'	0 - 0.5'	0 - 0.5'	0 - 0.5'	0.5' - 1.5'	1.5' - 3.5'	0 - 0.5'	0.5' - 1.5'
			SAMPLE DATE	5/7/2018	5/9/2018	5/9/2018	5/9/2018	9/28/2016	9/28/2016	9/28/2016	11/10/2016	11/10/2016	11/10/2016	11/10/2016	11/10/2016	11/10/2016	11/10/2016
PCBs																	
PCB, Total	1336-36-3	8.66		185	392	7.26	7.55	423	56	0.09	8.56	3.89	1,570	468	2.41	1,030	22

PCBs - Polychlorinated Biphenyls.
Results above RL are shown in **bold**. Results exceeding one or more criteria are shaded, as are the criteria which were exceeded.
Refer to the analytical report for the full list of PCB analytes.

TABLE 2
SUMMARY OF PCB ANALYSIS RESULTS - 2016-2018 SOIL
TECUMSEH SITE
SHEBOYGAN FALLS, WI
069638.00.051

ANALYTE	Chemical Abstract Service Number	CLEANUP GOALS	SAMPLE INFORMATION	CHEMICAL ANALYSES RESULTS (mg/kg)													
		Remedial Action Plan Cleanup Goal Commercial (mg/kg)	SAMPLE LOCATION	S15-1W	S15-2W	S15-2W	S15-2W	S16	S17	S18	S19	S20	S21	S22	GT1	GT2	GT3
			SAMPLE DEPTH (FEET BGS)	1.5' - 3.5'	0 - 0.5'	0.5' - 1.5'	1.5' - 3.5'	0.25' - 0.75'	0.25' - 0.75'	0.25' - 0.75'	0.17' - 0.67'	0.33' - 0.83'	0.33' - 0.83'	0.33' - 0.83'	0.17' - 0.67'	0.33' - 0.83'	0 - 0.5'
			SAMPLE DATE	11/10/2016	11/10/2016	11/10/2016	11/10/2016	9/28/2016	9/28/2016	9/28/2016	9/28/2016	9/28/2016	9/28/2016	9/28/2016	9/28/2016	9/28/2016	9/28/2016
PCBs																	
PCB, Total	1336-36-3	8.66		**0.94**	**136**	**20**	**1.05**	**0.08**	**0.83**	**0.08**	**2.82**	**0.03**	**3.73**	**4.79**	**0.60**	**1.28**	**3.20**

ANALYTE	Chemical Abstract Service Number	CLEANUP GOALS	SAMPLE INFORMATION	CHEMICAL ANALYSES RESULTS (mg/kg)													
		Remedial Action Plan Cleanup Goal Commercial (mg/kg)	SAMPLE LOCATION	GT4	DUP-SOIL 1	GT4	GT4	GT4-1E	GT4-1S	DUP SOIL 3A	GT4-1W	GT5	SMF1	SMF2	SMF3	SMF4	SMF5
			SAMPLE DEPTH (FEET BGS)	0 - 0.5'	GT4 (0 - 0.5')	0.5' - 1.5'	1.5' - 3.5'	0 - 0.5'	0 - 0.5'	GT4-1S (0 - 0.5")	0.17' - 0.67'	0 - 0.5'	0 - 0.5'	0 - 0.5'	0 - 0.5'	0 - 0.5'	0 - 0.5'
			SAMPLE DATE	9/28/2016	9/28/2016	9/28/2016	9/28/2016	11/10/2016	11/10/2016	11/10/2016	11/10/2016	9/28/2016	9/28/2016	9/28/2016	9/28/2016	9/28/2016	9/28/2016
PCBs																	
PCB, Total	1336-36-3	8.66		**9**	**3.90**	**60**	**1.44**	**0.76**	**3.12**	**6.77**	**3.20**	**0.53**	**0.19**	<0.0273	<0.0292	<0.0331	<0.0327

ANALYTE	Chemical Abstract Service Number	CLEANUP GOALS	SAMPLE INFORMATION	CHEMICAL ANALYSES RESULTS (mg/kg)													
		Remedial Action Plan Cleanup Goal Commercial (mg/kg)	SAMPLE LOCATION	SMF6	SMF7	CTF1	CTF2	CTF3	CTF4	CTF5	CTF6	CTF7	CTF8	SF1	SF2	P1	P2
			SAMPLE DEPTH (FEET BGS)	0 - 0.5'	0 - 0.5'	0 - 0.5'	0 - 0.5'	0 - 0.5'	0 - 0.5'	0 - 0.5'	0 - 0.5'	0 - 0.5'	0 - 0.5'	0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.5
			SAMPLE DATE	9/28/2016	9/28/2016	9/28/2016	9/29/2016	9/29/2016	9/28/2016	9/29/2016	9/29/2016	9/29/2016	9/29/2016	5/9/2018	5/9/2018	5/9/2018	5/9/2018
PCBs																	
PCB, Total	1336-36-3	8.66		<0.0310	<0.0310	**0.07**	**0.76**	**0.13**	<0.0298	**0.03**	<0.0295	**0.03**	<0.0295	**0.39**	**6.11**	**2.87**	**6.89**

ANALYTE	Chemical Abstract Service Number	CLEANUP GOALS	SAMPLE INFORMATION	CHEMICAL ANALYSES RESULTS (mg/kg)													
		Remedial Action Plan Cleanup Goal Commercial	SAMPLE LOCATION	P3	P4	P5	P6	P7	Duplicate Soil - 5	P8	BP1	BP1	DUP-SOIL #7	BP1	BP1	BP2	BP2
			SAMPLE DEPTH (FEET BGS)	0 - 0.5	0 - 0.5	0 - 0.5	0 - 0.25	0 - 0.5	P7 (0 - 0.5)	0 - 0.5	0 - 0.5	0.5 - 2	BP1 (0.5-2)	2 - 4	4 - 6	0 - 0.5	0.5 - 2
			SAMPLE DATE	5/9/2018	5/9/2018	5/9/2018	5/9/2018	5/9/2018	5/9/2018	5/9/2018	08/02/2018	08/02/2018	08/02/2018	08/02/2018	08/02/2018	08/02/2018	08/02/2018
PCBs																	
PCB, Total	1336-36-3	8.66		**0.25**	**0.37**	**0.41**	**0.83**	**0.86**	**1.68**	**1.84**	**1.12**	**19**	**21**	**1.55**	**30**	**12**	**13**

PCBs - Polychlorinated Biphenyls.
Results above RL are shown in **bold**. Results exceeding one or more criteria are shaded, as are the criteria which were exceeded.
Refer to the analytical report for the full list of PCB analytes.

TABLE 2
SUMMARY OF PCB ANALYSIS RESULTS - 2016-2018 SOIL
TECUMSEH SITE
SHEBOYGAN FALLS, WI
069638.00.051

ANALYTE	Chemical Abstract Service Number	CLEANUP GOALS	SAMPLE INFORMATION	CHEMICAL ANALYSES RESULTS (mg/kg)													
		Remedial Action Plan Cleanup Goal Commercial (mg/kg)	SAMPLE LOCATION	BP2	BP3	BP3	BP3	BP3	BP4	BP4	DUP-SOIL #8	BP4	S1001E	S1001E	S1001E	S1001E	S1002E
			SAMPLE DEPTH (FEET BGS)	2 - 3.75	0.5 - 1	1 - 2.5	2.5 - 4.5	4.5 - 5.5	0.5 - 1	1 - 2.5	BP4 (1-2.5)	2.5 - 4.5	0.66 - 1.75	2.5 - 4	4 - 6	6 - 7.5	0 - 0.5
			SAMPLE DATE	08/02/2018	08/02/2018	08/02/2018	08/02/2018	08/02/2018	08/02/2018	08/02/2018	08/02/2018	08/02/2018	08/01/2018	08/01/2018	08/01/2018	08/01/2018	08/01/2018
PCBs																	
PCB, Total	1336-36-3	8.66		0.05	0.08	0.45	**175**	**83**	2.15	1.57	1.47	1.06	**501**	0.31	**146**	**15**	1.19

ANALYTE	Chemical Abstract Service Number	CLEANUP GOALS	SAMPLE INFORMATION	CHEMICAL ANALYSES RESULTS (mg/kg)													
		Remedial Action Plan Cleanup Goal Commercial (mg/kg)	SAMPLE LOCATION	S1002E	S1002E	S1002E	S1002E	DUP-SOIL #2	S101N1E	S101N1E	S101N1E	S101N1E	S101N2E	S101N2E	S101N2E	S101N2E	S101N3E
			SAMPLE DEPTH (FEET BGS)	0.5 - 2	2 - 4	4 - 5	6 - 8	S1002E (6-8)	0.75 - 2	2 - 4	4 - 6	6 - 8	0.75 - 2	2 - 4	4 - 6	6 - 7.5	0.75 - 2
			SAMPLE DATE	08/01/2018	08/01/2018	08/01/2018	08/01/2018	08/01/2018	08/01/2018	08/01/2018	08/01/2018	08/01/2018	08/01/2018	08/01/2018	08/01/2018	08/01/2018	08/01/2018
PCBs																	
PCB, Total	1336-36-3	8.66		**887**	**65**	6.62	**63**	**18**	**489**	**43**	0.82	1.53	**31**	**78**	0.05	<0.0289	**203**

PCBs - Polychlorinated Biphenyls.
Results above RL are shown in **bold**. Results exceeding one or more criteria are shaded, as are the criteria which were exceeded.
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TABLE 2
SUMMARY OF PCB ANALYSIS RESULTS - 2016-2018 SOIL
TECUMSEH SITE
SHEBOYGAN FALLS, WI
069638.00.051

ANALYTE	Chemical Abstract Service Number	CLEANUP GOALS	SAMPLE INFORMATION	CHEMICAL ANALYSES RESULTS (mg/kg)													
		Remedial Action Plan Cleanup Goal Commercial (mg/kg)	SAMPLE LOCATION	S101N3E	S101N3E	DUP-SOIL #3	S101N3E	S103E	S103E	S103E	S103E	S104E	S104E	S104E	S104E	S105E	S105E
			SAMPLE DEPTH (FEET BGS)	2 - 4	4 - 6	S101N3E (4-6)	6 - 7	0.75 - 2	2 - 4	4 - 6	6 - 7	0.75 - 2	2 - 4	4 - 6	6 - 7	0.75 - 2	2 - 4
			SAMPLE DATE	08/01/2018	08/01/2018	08/01/2018	08/01/2018	08/01/2018	08/01/2018	08/01/2018	08/01/2018	08/01/2018	08/01/2018	08/01/2018	08/01/2018	08/01/2018	08/01/2018
PCBs																	
PCB, Total	1336-36-3	8.66		3.21	5.33	121	0.39	0.66	7.34	14	0.36	11,600	2,280	2.65	1.99	213	0.79

ANALYTE	Chemical Abstract Service Number	CLEANUP GOALS	SAMPLE INFORMATION	CHEMICAL ANALYSES RESULTS (mg/kg)													
		Remedial Action Plan Cleanup Goal Commercial (mg/kg)	SAMPLE LOCATION	S105E	S105E	S141W1N	S141W1N	S141W1N	S141W1N	S141W2N	S141W2N	S141W2N	S141W2N	S14S152N	S14S152N	S14S152N	S14S152N
			SAMPLE DEPTH (FEET BGS)	4 - 6	6 - 7	0 - 0.5	0.5 - 2	2 - 4	4 - 6	0 - 0.5	0.5 - 2	2 - 4	4 - 6	0 - 0.5	0.5 - 2	2 - 4	4 - 6
			SAMPLE DATE	08/01/2018	08/01/2018	8/2/2018	8/2/2018	8/2/2018	8/2/2018	8/2/2018	8/2/2018	8/2/2018	8/2/2018	8/2/2018	8/2/2018	8/2/2018	8/2/2018
PCBs																	
PCB, Total	1336-36-3	8.66		0.34	1.87	6.65	0.07	<0.0282	0.12	10	5.20	0.28	0.08	6.18	11,600	112	5.57

ANALYTE	Chemical Abstract Service Number	CLEANUP GOALS	SAMPLE INFORMATION	CHEMICAL ANALYSES RESULTS (mg/kg)													
		Remedial Action Plan Cleanup Goal Commercial (mg/kg)	SAMPLE LOCATION	S81E	S81E	S81E	S82E	S82E	S82E	S82E	S83E	S83E	S83E	S83ES	S83ES	DUP SOIL #1	S83ES
			SAMPLE DEPTH (FEET BGS)	0.66 - 2	2 - 4	4 - 6	0.66 - 2	2 - 4	4 - 6	6 - 7	0.66 - 2	2 - 4	4 - 6	0 - 0.5	0.5 - 2	S83ES (0.5-2)	2 - 4
			SAMPLE DATE	07/31/2018	07/31/2018	07/31/2018	07/31/2018	07/31/2018	07/31/2018	07/31/2018	07/31/2018	07/31/2018	07/31/2018	07/31/2018	07/31/2018	07/31/2018	07/31/2018
PCBs																	
PCB, Total	1336-36-3	8.66		1.70	1.40	<0.0283	486	13	4.40	0.48	32	0.04	3.99	0.87	0.03	0.07	9

PCBs - Polychlorinated Biphenyls.
Results above RL are shown in **bold**. Results exceeding one or more criteria are shaded, as are the criteria which were exceeded.
Refer to the analytical report for the full list of PCB analytes.

TABLE 2
SUMMARY OF PCB ANALYSIS RESULTS - 2016-2018 SOIL
TECUMSEH SITE
SHEBOYGAN FALLS, WI
069638.00.051

ANALYTE	Chemical Abstract Service Number	CLEANUP GOALS	SAMPLE INFORMATION	CHEMICAL ANALYSES RESULTS (mg/kg)													
		Remedial Action Plan Cleanup Goal Commercial (mg/kg)	SAMPLE LOCATION	S83ES	S83ES	S84E	S84E	S84E	S84E	S84E	S85E	S85E	S85E	S85E	S92S5E	S92S5E	S92S5E
			SAMPLE DEPTH (FEET BGS)	4 - 6	6 - 7.5	0 - 0.5	0.5 - 2	2 - 4	4 - 6	6 - 7.5	0 - 0.5	0.5 - 2	2 - 4	4 - 6	0.66 - 2	2 - 4	4 - 6
			SAMPLE DATE	07/31/2018	07/31/2018	08/01/2018	08/01/2018	08/01/2018	08/01/2018	08/01/2018	08/01/2018	08/01/2018	08/01/2018	08/01/2018	08/01/2018	08/01/2018	08/01/2018
PCBs																	
PCB, Total	1336-36-3	8.66		3.75	4.79	2.48	**9**	7.04	0.86	0.51	1.30	0.55	0.62	**28**	**72**	0.45	**27**

ANALYTE	Chemical Abstract Service Number	CLEANUP GOALS	SAMPLE INFORMATION	CHEMICAL ANALYSES RESULTS (mg/kg)													
		Remedial Action Plan Cleanup Goal Commercial (mg/kg)	SAMPLE LOCATION	S92S5E	S93S1E	S93S1E	S93S1E	S93S2E	S93S2E	S93S2E	SBP1	SBP1	SBP1	SBP2	SBP2	SBP2	SBP3
			SAMPLE DEPTH (FEET BGS)	6 - 7	0.66 - 2	2 - 4	4 - 6	0.5 - 2	2 - 4	4 - 6	1 - 2	2 - 4	4 - 6	1 - 2	2 - 4	4 - 6	0 - 0.5
			SAMPLE DATE	08/01/2018	07/31/2018	07/31/2018	07/31/2018	07/31/2018	07/31/2018	07/31/2018	8/1/2018	8/1/2018	8/1/2018	8/1/2018	8/1/2018	8/1/2018	8/1/2018
PCBs																	
PCB, Total	1336-36-3	8.66		**15**	**437**	**113**	1.99	**697**	**91**	**511**	0.83	1.86	**34**	3.88	0.18	1.50	0.61

ANALYTE	Chemical Abstract Service Number	CLEANUP GOALS	SAMPLE INFORMATION	CHEMICAL ANALYSES RESULTS (mg/kg)													
		Remedial Action Plan Cleanup Goal Commercial (mg/kg)	SAMPLE LOCATION	SBP3	SBP3	SBP3	SBP3	SBP4	SBP4	SBP4	SBP4	SBP5	SBP5	SBP5	SBP5	SBP6	SBP6
			SAMPLE DEPTH (FEET BGS)	0.5 - 2	2 - 4	4 - 6	6 - 7.5	0 - 0.5	0.5 - 2	2 - 4	4 - 6	0 - 0.5	0.5 - 2	2 - 4	4 - 6	0 - 0.5	0.5 - 2
			SAMPLE DATE	8/1/2018	8/1/2018	8/1/2018	8/1/2018	8/1/2018	8/1/2018	8/1/2018	8/1/2018	8/1/2018	8/1/2018	8/1/2018	8/1/2018	08/01/2018	08/01/2018
PCBs																	
PCB, Total	1336-36-3	8.66		0.03	**17**	**18**	4.56	0.34	**10**	0.33	2.26	0.13	0.42	0.73	0.86	**28**	**161**

ANALYTE	Chemical Abstract Service Number	CLEANUP GOALS	SAMPLE INFORMATION	CHEMICAL ANALYSES RESULTS (mg/kg)													
		Remedial Action Plan Cleanup Goal Commercial (mg/kg)	SAMPLE LOCATION	SBP6	DUP-SOIL #4	SBP6	SBP6	SBP7	SBP7	SBP7	SBP7	SBP8	SBP8	DUP-SOIL #5	SBP8	SBP8	SBP9
			SAMPLE DEPTH (FEET BGS)	2 - 4	SBP6 (2-4)	4 - 6	6 - 7	0 - 0.5	0.5 - 2	2 - 4	4 - 6	0 - 0.5	0.5 - 2	SBP8 (0.5-2)	2 - 4	4 - 6	0 - 0.5
			SAMPLE DATE	08/01/2018	08/01/2018	08/01/2018	08/01/2018	08/01/2018	08/01/2018	08/01/2018	08/01/2018	08/01/2018	08/01/2018	08/01/2018	08/01/2018	08/01/2018	08/01/2018
PCBs																	
PCB, Total	1336-36-3	8.66		**15**	**10**	0.28	0.39	1.77	**12**	0.24	0.38	2.16	**71**	**60**	4.97	**15**	**27**

PCBs - Polychlorinated Biphenyls.
Results above RL are shown in **bold**. Results exceeding one or more criteria are shaded, as are the criteria which were exceeded.
Refer to the analytical report for the full list of PCB analytes.

TABLE 2
SUMMARY OF PCB ANALYSIS RESULTS - 2016-2018 SOIL
TECUMSEH SITE
SHEBOYGAN FALLS, WI
069638.00.051

ANALYTE	Chemical Abstract Service Number	CLEANUP GOALS	SAMPLE INFORMATION	CHEMICAL ANALYSES RESULTS (mg/kg)					
		Remedial Action Plan Cleanup Goal Commercial (mg/kg)	SAMPLE LOCATION	SBP9	SBP9	SBP10	SBP10	SBP10	SBP10
			SAMPLE DEPTH (FEET BGS)	0.5 - 2	2 - 4	0.75 - 2	2 - 4	4 - 6	6 - 7
			SAMPLE DATE	08/01/2018	08/01/2018	08/01/2018	08/01/2018	08/01/2018	6/7/2018
PCBs									
PCB, Total	1336-36-3	8.66		**12**	**1.55**	**0.14**	**15**	**49**	**0.39**

PCBs - Polychlorinated Biphenyls.
Results above RL are shown in **bold**. Results exceeding one or more criteria are shaded, as are the criteria which were exceeded.
Refer to the analytical report for the full list of PCB analytes.

TABLE 2
SUMMARY OF PCB ANALYSIS RESULTS - 2021 SOIL
TECUMSEH SITE
SHEBOYGAN FALLS, WI
069638.00.051

ANALYTE	Chemical Abstract Service Number	CLEANUP GOALS	SAMPLE INFORMATION	CHEMICAL ANALYSES RESULTS (mg/kg)													
		Remedial Action Plan Cleanup Goal Commercial (mg/kg)	SAMPLE LOCATION	PL1	PL1	PL2	PL2	PL3	PL3	PL4	PL4	PL5	PL5	PL6	PL6	PL7	PL7
			SAMPLE DEPTH (FEET BGS)	0.3-0.5	0.5-2	0.3-0.5	0.5-2	0.3-0.5	0.5-2	0.3-0.5	0.5-2	0.3-0.5	0.5-2	0.2-0.5	0.5-2	0.25-0.5	0.5-2
			SAMPLE DATE	9/28/2021	9/28/2021	9/28/2021	9/28/2021	9/28/2021	9/28/2021	9/28/2021	9/28/2021	9/28/2021	9/28/2021	9/29/2021	9/29/2021	9/28/2021	9/28/2021
PCBs																	
PCB, Total	1336-36-3	8.66		**0.0174**	**0.192**	**9.77**	**0.225**	**2.42**	<0.0166	**4.5**	<0.0173	**1.59**	**1.03**	**0.095**	<0.0175	**0.0183**	<0.0178

ANALYTE	Chemical Abstract Service Number	CLEANUP GOALS	SAMPLE INFORMATION	CHEMICAL ANALYSES RESULTS (mg/kg)														
		Remedial Action Plan Cleanup Goal Commercial (mg/kg)	SAMPLE LOCATION	PL8	PL8	PL9	PL9	PL10	PL10	PL11	PL11	PL12	PL12	PL13	PL13	PL14	PL14	Dup1
			SAMPLE DEPTH (FEET BGS)	0.25-0.5	0.5-2	0.25-0.5	0.5-2	0.3-0.5	0.5-2	0.3-0.5	0.5-2	0.25-0.5	0.5-2	0.25-0.5	0.5-2	0.25-0.5	0.5-2	PL14 (0.5-2)
			SAMPLE DATE	9/28/2021	9/28/2021	9/28/2021	9/28/2021	9/29/2021	9/29/2021	9/29/2021	9/29/2021	9/28/2021	9/28/2021	9/28/2021	9/28/2021	9/28/2021	9/28/2021	9/28/2021
PCBs																		
PCB, Total	1336-36-3	8.66		**3.95**	<0.0178	**0.683**	**1.11**	**0.294**	**0.617**	**0.345**	<0.0175	**0.177**	<0.0175	**0.202**	<0.0176	**1.16**	<0.0181	<0.0181

ANALYTE	Chemical Abstract Service Number	CLEANUP GOALS	SAMPLE INFORMATION	CHEMICAL ANALYSES RESULTS (mg/kg)														
		Remedial Action Plan Cleanup Goal Commercial (mg/kg)	SAMPLE LOCATION	PL15	PL15	PL16	PL16	PL17	PL17	PL18	PL18	PL19	PL19	PL19	PL20	PL20	PL21	PL21
			SAMPLE DEPTH (FEET BGS)	0.2-0.5	0.5-2	0.25-0.5	0.5-2	0.25-0.5	0.5-2	0.25-0.5	0.5-2	0.25-0.5	0.5-2	2 - 4	0.25-0.5	0.5-2	0.25-0.5	0.5-2
			SAMPLE DATE	9/29/2021	9/29/2021	9/29/2021	9/29/2021	9/29/2021	9/29/2021	9/29/2021	9/29/2021	9/29/2021	9/29/2021	9/29/2021	9/28/2021	9/28/2021	9/28/2021	9/28/2021
PCBs																		
PCB, Total	1336-36-3	8.66		**0.087**	**4.060**	**2.82**	<0.0178	**0.775**	<0.0176	**7.74**	<0.018	**0.579**	**27.20**	**0.037**	**0.0234**	<0.018	**0.138**	**0.0244**

ANALYTE	Chemical Abstract Service Number	CLEANUP GOALS	SAMPLE INFORMATION	CHEMICAL ANALYSES RESULTS (mg/kg)														
		Remedial Action Plan Cleanup Goal Commercial (mg/kg)	SAMPLE LOCATION	PL22	PL22	PL23	PL23	PL24	PL24	PL25	PL25	PL26	PL26	PL27	PL27	Dup2	PL28	PL28
			SAMPLE DEPTH (FEET BGS)	0.25-0.5	0.5-2	0.25-0.5	0.5-2	0.3-0.5	0.5-2	0-0.5	0.5-2	0.3-0.5	0.5-2	0.3-0.5	0.5-2	PL27 (0.5-2)	0-0.5	0.5-2
			SAMPLE DATE	9/28/2021	9/28/2021	9/28/2021	9/28/2021	9/28/2021	9/28/2021	9/29/2021	9/29/2021	9/28/2021	9/28/2021	9/28/2021	9/28/2021	9/28/2021	9/29/2021	9/29/2021
PCBs																		
PCB, Total	1336-36-3	8.66		**2.28**	<0.0178	**0.348**	**0.388**	**3.92**	<0.0174	<0.0156	**0.508**	<0.0159	**0.101**	<0.0159	**0.0404**	**0.0291**	<0.0167	**0.089**

PCBs - Polychlorinated Biphenyls.
Results above RL are shown in **bold**. Results exceeding one or more criteria are shaded, as are the criteria which were exceeded.
Refer to the analytical report for the full list of PCB analytes.

TABLE 2
SUMMARY OF PCB ANALYSIS RESULTS - 2021 SOIL
TECUMSEH SITE
SHEBOYGAN FALLS, WI
069638.00.051

ANALYTE	Chemical Abstract Service Number	CLEANUP GOALS	SAMPLE INFORMATION	CHEMICAL ANALYSES RESULTS (mg/kg)													
		Remedial Action Plan Cleanup Goal Commercial (mg/kg)	SAMPLE LOCATION	PL29	PL29	PL30	PL30	PL31	PL31	PL32	PL32	Dup3	PL33	PL33	Dup 4	PL34	PL34
			SAMPLE DEPTH (FEET BGS)	0.25-.05	0.5-2	0.25-0.5	0.5-2	0.25-0.5	0.5-2	0.2-0.5	0.5-2	PL32 (0.5-2)	0.2-0.5	0.5-2	PL33 (0.5-2)	0.25-0.5	0.5-2
			SAMPLE DATE	9/29/2021	9/29/2021	9/29/2021	9/29/2021	9/29/2021	9/29/2021	9/29/2021	9/29/2021	9/29/2021	9/29/2021	9/29/2021	9/29/2021	9/29/2021	9/29/2021
PCBs																	
PCB, Total	1336-36-3	8.66		<0.0163	**0.023**	<0.0167	**2.680**	<0.0179	<0.0180	**0.652**	**0.257**	**0.224**	<0.0173	<0.0177	<0.0176	**0.338**	<0.0178

ANALYTE	Chemical Abstract Service Number	CLEANUP GOALS	SAMPLE INFORMATION	CHEMICAL ANALYSES RESULTS (mg/kg)													
		Remedial Action Plan Cleanup Goal Commercial (mg/kg)	SAMPLE LOCATION	PL35	PL35	PL36	PL36	PL37	PL37	PL38	PL38	FBP1	FBP1	FBP2	FBP2	FBP3	FBP3
			SAMPLE DEPTH (FEET BGS)	0.2-0.5	0.5-2	0.25-0.5	0.5-2	0.2-0.5	0.5-2	0.25-0.5	0.5-2	0 - 0.5	0.5 - 2	0 - 0.5	0.5 - 2	0 - 0.5	0.5 - 2
			SAMPLE DATE	9/29/2021	9/29/2021	9/29/2021	9/29/2021	9/29/2021	9/29/2021	9/29/2021	9/29/2021	10/7/2021	10/7/2021	10/7/2021	10/7/2021	10/7/2021	10/7/2021
PCBs																	
PCB, Total	1336-36-3	8.66		**0.356**	**0.194**	<0.0169	<0.0180	**1.960**	**0.065**	<0.0161	**0.295**	**0.500**	**0.0237**	**0.0403**	**0.051**	**0.0617**	<0.0177

ANALYTE	Chemical Abstract Service Number	CLEANUP GOALS	SAMPLE INFORMATION	CHEMICAL ANALYSES RESULTS (mg/kg)													
		Remedial Action Plan Cleanup Goal Commercial (mg/kg)	SAMPLE LOCATION	DP1	DP1	DP1	DP1	DP2	DP2	DP2	DP2	DP3	DP3	DP3	DP4	DP4	DP4
			SAMPLE DEPTH (FEET BGS)	0.7 - 2	2 - 4	4 - 6	6 - 8	0.9 - 2	2 - 4	4 - 6	6 - 8	0.8 - 2	2 - 4	4 - 6	0.8 - 2	2 - 4	4 - 6
			SAMPLE DATE	10/4/2021	10/4/2021	10/4/2021	10/4/2021	10/4/2021	10/4/2021	10/4/2021	10/4/2021	10/1/2021	10/1/2021	10/1/2021	10/1/2021	10/1/2021	10/1/2021
PCBs																	
PCB, Total	1336-36-3	8.66		**17,500**	**17,000**	**13,900**	**683**	**2.89**	**0.449**	**0.945**	**0.235**	**3.07**	<0.0190	**0.659**	**0.0822**	**0.147**	<0.0181

ANALYTE	Chemical Abstract Service Number	CLEANUP GOALS	SAMPLE INFORMATION	CHEMICAL ANALYSES RESULTS (mg/kg)												
		Remedial Action Plan Cleanup Goal Commercial (mg/kg)	SAMPLE LOCATION	DP5	Dup20	DP5	DP5	DP5	DP6	DP6	DP6	DP7	Dup15	DP7	DP7	DP7
			SAMPLE DEPTH (FEET BGS)	0.5 - 2	DP5 (0.5-2)	2 - 4	4 - 6	6 - 8	0.9 - 2	2 - 4	4 - 6	0.7 - 2	DP7 (0.7-2)	2 - 4	4 - 6	6 - 8
			SAMPLE DATE	10/4/2021	10/4/2021	10/4/2021	10/4/2021	10/4/2021	10/1/2021	10/1/2021	10/1/2021	10/1/2021	10/1/2021	10/1/2021	10/1/2021	10/1/2021
PCBs																
PCB, Total	1336-36-3	8.66		**235**	**279**	**4,220**	**2,220**	**190**	**214**	**1,110**	**6.81**	**7.92**	**14.5**	**120**	**55.3**	**0.108**

PCBs - Polychlorinated Biphenyls.
Results above RL are shown in **bold**. Results exceeding one or more criteria are shaded, as are the criteria which were exceeded.
Refer to the analytical report for the full list of PCB analytes.

TABLE 2
SUMMARY OF PCB ANALYSIS RESULTS - 2021 SOIL
TECUMSEH SITE
SHEBOYGAN FALLS, WI
069638.00.051

ANALYTE	Chemical Abstract Service Number	CLEANUP GOALS	SAMPLE INFORMATION	CHEMICAL ANALYSES RESULTS (mg/kg)												
		Remedial Action Plan Cleanup Goal Commercial (mg/kg)	SAMPLE LOCATION	DP8	Dup19	DP8	DP8	DP8	DP9	Dup21	DP9	DP9	DP10	DP10	DP10	DP10
			SAMPLE DEPTH (FEET BGS)	0.6-2	DP8 (0.6-2)	2 - 4	4 - 6	6 - 8	0.6 - 2	DP9 (0.6-2)	2 - 4	4 - 6	0.8 - 2	2 - 4	4 - 6	6 - 8
			SAMPLE DATE	10/4/2021	10/4/2021	10/4/2021	10/4/2021	10/4/2021	10/4/2021	10/4/2021	10/4/2021	10/4/2021	10/4/2021	10/4/2021	10/4/2021	10/4/2021
PCBs																
PCB, Total	1336-36-3	8.66		1.68	1.91	**2.15**	21.6	0.343	0.0278	0.679	**0.0253**	0.0727	482	13,300	8,640	3.68

ANALYTE	Chemical Abstract Service Number	CLEANUP GOALS	SAMPLE INFORMATION	CHEMICAL ANALYSES RESULTS (mg/kg)												
		Remedial Action Plan Cleanup Goal Commercial (mg/kg)	SAMPLE LOCATION	DP11	DP11	DP11	DP12	DP12	DP13	DP13	DP13	DP14	DP14	DP14	DP14	
			SAMPLE DEPTH (FEET BGS)	0.7 - 2	2 - 4	4 - 6	2.1 - 4	4 - 6	0.7 - 2	2 - 4	4 - 6	0.7 - 2	2 - 4	4 - 6	6 - 8	
			SAMPLE DATE	10/4/2021	10/4/2021	10/4/2021	10/4/2021	10/4/2021	10/4/2021	10/4/2021	10/4/2021	10/4/2021	10/4/2021	10/4/2021	10/4/2021	
PCBs																
PCB, Total	1336-36-3	8.66		0.791	6.72	1.75	13.4	9.43	6,120	15,100	213	623	57.6	118	16.4	

ANALYTE	Chemical Abstract Service Number	CLEANUP GOALS	SAMPLE INFORMATION	CHEMICAL ANALYSES RESULTS (mg/kg)												
		Remedial Action Plan Cleanup Goal Commercial (mg/kg)	SAMPLE LOCATION	DP15	Dup16	DP15	DP15	DP16	DP16	DP16	DP16	DP17	DP17	Dup17	DP17	DP17
			SAMPLE DEPTH (FEET BGS)	0.5 - 2	DP15 (0.5-2)	2 - 4	4 - 6	0.6 - 2	2 - 4	4 - 6	6 - 8	0.6 - 2	2 - 4	DP17 (2-4)	4 - 6	6 - 7
			SAMPLE DATE	10/1/2021	10/1/2021	10/1/2021	10/1/2021	10/4/2021	10/4/2021	10/4/2021	10/4/2021	10/1/2021	10/4/2021	10/4/2021	10/4/2021	10/4/2021
PCBs																
PCB, Total	1336-36-3	8.66		1.28	0.266	0.0357	0.0976	2,070	**2,250**	1,600	6.46	1.05	30.6	115	84.4	1.19

ANALYTE	Chemical Abstract Service Number	CLEANUP GOALS	SAMPLE INFORMATION	CHEMICAL ANALYSES RESULTS (mg/kg)												
		Remedial Action Plan Cleanup Goal Commercial (mg/kg)	SAMPLE LOCATION	DP18	Dup11	DP18	DP18	DP18	DP19	Dup10	DP19	DP19	DP19	DP20	DP20	DP20	DP20
			SAMPLE DEPTH (FEET BGS)	0.6 - 2	DP (0.6-2)	2 - 4	4 - 6	6 - 8	0.7 - 2	DP19 (0.7-2)	2 - 4	4 - 6	6 - 8	0.6 - 2	2 - 4	4 - 6	6 - 8
			SAMPLE DATE	10/1/2021	10/1/2021	10/1/2021	10/1/2021	10/1/2021	9/30/2021	9/29/2021	9/30/2021	9/30/2021	9/30/2021	10/4/2021	10/4/2021	10/4/2021	10/4/2021
PCBs																	
PCB, Total	1336-36-3	8.66		1.09	1.03	3.47	18.9	<0.018	0.874	0.893	64.5	114	0.101	0.0542	0.0258	0.146	0.163

PCBs - Polychlorinated Biphenyls.
Results above RL are shown in **bold**. Results exceeding one or more criteria are shaded, as are the criteria which were exceeded.
Refer to the analytical report for the full list of PCB analytes.

TABLE 2
SUMMARY OF PCB ANALYSIS RESULTS - 2021 SOIL
TECUMSEH SITE
SHEBOYGAN FALLS, WI
069638.00.051

ANALYTE	Chemical Abstract Service Number	CLEANUP GOALS	SAMPLE INFORMATION	CHEMICAL ANALYSES RESULTS (mg/kg)													
		Remedial Action Plan Cleanup Goal Commercial (mg/kg)	SAMPLE LOCATION	DP21	DP21	DP22	DP22	DP22	DP23	DP23	DP23	Dup12	DP23	DP24	DP24	DP24	DP24
			SAMPLE DEPTH (FEET BGS)	0.6 -2	2 - 3	1 - 2	2 - 4	4 - 6	0.7 - 2	2 - 4	4 - 6	Dup23 (4-6)	6 - 8	0.7 - 2	2 - 4	4 - 6	6 - 8
			SAMPLE DATE	10/1/2021	10/1/2021	10/1/2021	10/1/2021	10/1/2021	10/1/2021	10/1/2021	10/1/2021	10/1/2021	10/1/2021	10/1/2021	10/1/2021	10/1/2021	10/1/2021
PCBs																	
PCB, Total	1336-36-3	8.66		**11.2**	3.11	1.47	0.484	2.45	0.924	0.724	**28.1**	0.756	3.18	1.4	**638**	**329**	0.127

ANALYTE	Chemical Abstract Service Number	CLEANUP GOALS	SAMPLE INFORMATION	CHEMICAL ANALYSES RESULTS (mg/kg)													
		Remedial Action Plan Cleanup Goal Commercial (mg/kg)	SAMPLE LOCATION	DP25	DP25	DP25	DP26	DP26	DP26	DP27	DP27	DP27	DP28	DP28	DP28	DP29	DP29	DP29
			SAMPLE DEPTH (FEET BGS)	0.7 - 2	2 - 4	4 - 6	0.6 - 2	2 - 4	4 - 6	0.6 - 2	2 - 4	4 - 6	0.6 - 2	2 - 4	4 - 6	0.7 - 2	2 - 4	4 - 6
			SAMPLE DATE	10/1/2021	10/1/2021	10/1/2021	10/4/2021	10/4/2021	10/4/2021	10/1/2021	10/1/2021	10/1/2021	10/4/2021	10/4/2021	10/4/2021	10/4/2021	10/4/2021	10/4/2021
PCBs																		
PCB, Total	1336-36-3	8.66		3.53	**82.9**	5.1	**1.09**	**0.326**	**0.107**	2.97	0.0789	0.022	2.14	0.499	0.0213	2.23	**19.9**	0.304

ANALYTE	Chemical Abstract Service Number	CLEANUP GOALS	SAMPLE INFORMATION	CHEMICAL ANALYSES RESULTS (mg/kg)												
		Remedial Action Plan Cleanup Goal Commercial (mg/kg)	SAMPLE LOCATION	DP30	DP30	DP30	DP30	DP31	DP31	DP31	DP32	DP32	DP33	Dup13	DP33	DP33	DP33
			SAMPLE DEPTH (FEET BGS)	0.7 - 2	2 - 4	4 - 6	6 - 8	0.6 - 2	2 - 4	4 - 6	0.8 - 2	2 - 4	0.6 - 2	DP33 (0.6-2)	2 - 4	4 - 6	6 - 7
			SAMPLE DATE	10/4/2021	10/4/2021	10/4/2021	10/4/2021	10/4/2021	10/4/2021	10/4/2021	10/4/2021	10/4/2021	10/1/2021	10/1/2021	10/1/2021	10/1/2021	10/1/2021
PCBs																	
PCB, Total	1336-36-3	8.66		0.940	**7,920**	**915**	**1.5**	**21.4**	2.99	1.12	**2.67**	**107**	0.695	0.749	**7,740**	**167**	0.443

ANALYTE	Chemical Abstract Service Number	CLEANUP GOALS	SAMPLE INFORMATION	CHEMICAL ANALYSES RESULTS (mg/kg)											
		Remedial Action Plan Cleanup Goal Commercial (mg/kg)	SAMPLE LOCATION	DP34	DP34	DP34	DP34	DP35	Dup18	DP35	DP35	DP36	DP36	DP37	DP37
			SAMPLE DEPTH (FEET BGS)	0.7 - 2	2 - 4	4 - 6	6 - 8	0.7 - 2	DP35 (0.7-2)	2 - 4	4 - 6	0.7 - 2	2 - 3.5	2 - 4	6 - 8
			SAMPLE DATE	10/1/2021	10/1/2021	10/1/2021	10/1/2021	10/4/2021	10/4/2021	10/4/2021	10/4/2021	10/1/2021	10/1/2021	10/1/2021	10/1/2021
PCBs															
PCB, Total	1336-36-3	8.66		3.73	**341**	**44.1**	**3,360**	0.0524	0.061	0.0775	0.0417	**181**	1.75	0.692	2.16

PCBs - Polychlorinated Biphenyls.
Results above RL are shown in **bold**. Results exceeding one or more criteria are shaded, as are the criteria which were exceeded.
Refer to the analytical report for the full list of PCB analytes.

TABLE 2
SUMMARY OF PCB ANALYSIS RESULTS - 2021 SOIL
TECUMSEH SITE
SHEBOYGAN FALLS, WI
069638.00.051

ANALYTE	Chemical Abstract Service Number	CLEANUP GOALS	SAMPLE INFORMATION	CHEMICAL ANALYSES RESULTS (mg/kg)											
		Remedial Action Plan Cleanup Goal Commercial (mg/kg)	SAMPLE LOCATION	SBP6-1N	SBP6-1N	SBP6-1N	SBP6-1N	SBP6-1E	SBP6-1E	SBP6-1E	SBP6-1S	Dup6	SBP6-1S	SBP6-1S	SBP6-1S
			SAMPLE DEPTH (FEET BGS)	0.3-2	2 - 4	4 - 6	6 - 8	0 - 0.5	0.5 - 2	4 - 6	0 - 0.5	SBP6-1S (0-0.5)	0.5 - 2	2 - 4	4 - 6
			SAMPLE DATE	9/30/2021	9/30/2021	9/30/2021	9/30/2021	9/30/2021	9/30/2021	9/30/2021	9/30/2021	9/30/2021	9/30/2021	9/30/2021	9/30/2021
PCBs															
PCB, Total	1336-36-3	8.66		0.337	0.053	3.18	0.0302	142	23.6	38.9	131	131	958	2.69	25.9

ANALYTE	Chemical Abstract Service Number	CLEANUP GOALS	SAMPLE INFORMATION	CHEMICAL ANALYSES RESULTS (mg/kg)												
		Remedial Action Plan Cleanup Goal Commercial (mg/kg)	SAMPLE LOCATION	SBP6-1W	SBP6-1W	SBP6-1W	SBP6-1W	BP3-1N	BP3-1N	B93-1N	BP3-1S	BP3-1S	BP3-1S	SBP11	SBP11	SBP11
			SAMPLE DEPTH (FEET BGS)	0 - 0.5	0.5 - 2	2 - 4	4 - 6	0 - 0.5	0.5 - 2	4 - 6	0.5 - 2	2 - 4	4 - 6	0.6 - 2	2 - 4	4 - 5
			SAMPLE DATE	9/30/2021	9/30/2021	9/30/2021	9/30/2021	10/5/2021	10/5/2021	10/5/2021	10/5/2021	10/5/2021	10/5/2021	9/30/2021	9/30/2021	9/30/2021
PCBs																
PCB, Total	1336-36-3	8.66		1.81	104	2.0	5.24	27	7.14	0.308	23.5	579	30.4	0.806	0.435	1.11

ANALYTE	Chemical Abstract Service Number	CLEANUP GOALS	SAMPLE INFORMATION	CHEMICAL ANALYSES RESULTS (mg/kg)														
		Remedial Action Plan Cleanup Goal Commercial (mg/kg)	SAMPLE LOCATION	SBP12	SBP12	SBP12	SBP12	SBP13	Dup9	SBP13	SBP13	SBP14	SBP14	SBP14	SBP15	SBP15	SBP15	SBP15
			SAMPLE DEPTH (FEET BGS)	0 - 0.5	0.5 - 2	2 - 4	4 - 6	1 - 2	SBP13 (1-2)	2 - 4	4 - 6	0.7 - 2	2 - 4	4 - 6	0 - 0.5	0.5 - 2	4 - 6	6 - 8
			SAMPLE DATE	9/30/2021	9/30/2021	9/30/2021	9/30/2021	9/30/2021	9/30/2021	9/30/2021	9/30/2021	9/30/2021	9/30/2021	9/30/2021	9/30/2021	9/30/2021	9/30/2021	9/30/2021
PCBs																		
PCB, Total	1336-36-3	8.66		58.4	22.8	0.305	0.530	1.32	2.07	99.8	5.9	9.82	12	0.47	1.88	1.07	86.3	0.311

ANALYTE	Chemical Abstract Service Number	CLEANUP GOALS	SAMPLE INFORMATION	CHEMICAL ANALYSES RESULTS (mg/kg)														
		Remedial Action Plan Cleanup Goal Commercial (mg/kg)	SAMPLE LOCATION	SBP16	SBP16	SBP16	SBP16	SBP17	SBP17	SBP17	SBP18	Dup8	SBP18	SBP18	SBP19	SBP19	SBP19	SBP19
			SAMPLE DEPTH (FEET BGS)	0 - 0.5	0.5 - 2	4 - 6	6 - 7	0.6 - 2	2 - 4	4 - 6	0.6 - 2	SBP18 (0.6 - 2)	2 - 4	4 - 6	0 - 0.5	0.5 - 2	2 - 4	4 - 5
			SAMPLE DATE	9/30/2021	9/30/2021	9/30/2021	9/30/2021	9/30/2021	9/30/2021	9/30/2021	9/30/2021	9/30/2021	9/30/2021	9/30/2021	9/29/2021	9/29/2021	9/29/2021	9/29/2021
PCBs																		
PCB, Total	1336-36-3	8.66		42.2	115	43.7	14.1	2.64	21.4	239	422	64.3	1.52	118	0.387	15.9	2.94	5.63

PCBs - Polychlorinated Biphenyls.
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TABLE 2
SUMMARY OF PCB ANALYSIS RESULTS - 2021 SOIL
TECUMSEH SITE
SHEBOYGAN FALLS, WI
069638.00.051

ANALYTE	Chemical Abstract Service Number	CLEANUP GOALS	SAMPLE INFORMATION	CHEMICAL ANALYSES RESULTS (mg/kg)													
		Remedial Action Plan Cleanup Goal Commercial (mg/kg)	SAMPLE LOCATION	SBP20	SBP20	SBP20	SBP20	SBP21	SBP21	SBP21	SBP21	SBP22	SBP22	SBP22	SBP23	SBP23	SBP23
			SAMPLE DEPTH (FEET BGS)	0 - 0.5	0.5 - 2	2 - 4	4 - 5	0.6 - 2	2 - 4	4 - 6	6 - 7	0.5 - 2	2 - 4	4 - 6	1 - 2	2 - 4	4 - 6
			SAMPLE DATE	9/29/2021	9/29/2021	9/29/2021	9/29/2021	9/30/2021	9/30/2021	9/30/2021	9/30/2021	9/30/2021	9/30/2021	9/30/2021	9/29/2021	9/29/2021	9/29/2021
PCBs																	
PCB, Total	1336-36-3	8.66		1.27	0.57	0.0809	0.346	4.86	1.31	3.9	2.04	72.4	16.9	2.78	269	0.729	2.84

ANALYTE	Chemical Abstract Service Number	CLEANUP GOALS	SAMPLE INFORMATION	CHEMICAL ANALYSES RESULTS (mg/kg)									
		Remedial Action Plan Cleanup Goal Commercial (mg/kg)	SAMPLE LOCATION	SBP24	Dup5	SBP24	SBP24	SBP24	SBP24	SBP25	Dup7	SBP25	SBP25
			SAMPLE DEPTH (FEET BGS)	0 - 0.5	SBP24 (0-0.5)	0.5 - 2	2 - 4	4 - 6	6 - 7.5	0.5 - 2	SBP25 (0.5-2)	2 - 4	4 - 6
			SAMPLE DATE	9/29/2021	9/29/2021	9/29/2021	9/30/2021	9/30/2021	9/30/2021	9/30/2021	9/30/2021	9/30/2021	9/30/2021
PCBs													
PCB, Total	1336-36-3	8.66		0.598	1.75	6.24	77.3	25.8	0.587	0.823	0.934	77.3	0.0234

ANALYTE	Chemical Abstract Service Number	CLEANUP GOALS	SAMPLE INFORMATION	CHEMICAL ANALYSES RESULTS (mg/kg)													
		Remedial Action Plan Cleanup Goal Commercial (mg/kg)	SAMPLE LOCATION	ROW1	ROW1	ROW1	ROW1	ROW2	ROW2	ROW2	ROW2	ROW3	Dup22	ROW3	ROW3	ROW3	
			SAMPLE DEPTH (FEET BGS)	0 - 0.5	0.5 - 2	4 - 6	6 - 7	0 - 0.5	0.5 - 2	2 - 4	4 - 6	0 - 0.5	ROW3 (0-0.5)	0.5 - 2	2 - 4	4 - 6	
			SAMPLE DATE	10/5/2021	10/5/2021	10/5/2021	10/5/2021	10/5/2021	10/5/2021	10/5/2021	10/5/2021	10/5/2021	10/5/2021	10/5/2021	10/5/2021	10/5/2021	
PCBs																	
PCB, Total	1336-36-3	8.66		17.7	66.1	22.2	4.92	10.9	9.37	1.26	0.929	1.61	2.94	11.6	<0.0166	0.0193	

ANALYTE	Chemical Abstract Service Number	CLEANUP GOALS	SAMPLE INFORMATION	CHEMICAL ANALYSES RESULTS (mg/kg)													
		Remedial Action Plan Cleanup Goal Commercial (mg/kg)	SAMPLE LOCATION	ROW4	ROW4	ROW4	ROW4	ROW5	ROW5	ROW5	ROW6	ROW6	ROW6	ROW7	ROW7	ROW7	ROW7
			SAMPLE DEPTH (FEET BGS)	0 - 0.5	0.5 - 2	2 - 4	4 - 6	0 - 0.5	0.5 - 2	4 - 6	0 - 0.5	0.5 - 2	4 - 6	0 - 0.5	0.5 - 2	2 - 4	4 - 6
			SAMPLE DATE	10/5/2021	10/5/2021	10/5/2021	10/5/2021	10/5/2021	10/5/2021	10/5/2021	10/5/2021	10/5/2021	10/5/2021	10/5/2021	10/5/2021	10/5/2021	10/5/2021
PCBs																	
PCB, Total	1336-36-3	8.66		81.1	20.9	0.397	1.08	4.81	0.885	<0.204	5.92	0.918	0.334	6.84	66.5	0.288	0.0952

PCBs - Polychlorinated Biphenyls.
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TABLE 2
SUMMARY OF PCB ANALYSIS RESULTS - 2021 SOIL
TECUMSEH SITE
SHEBOYGAN FALLS, WI
069638.00.051

ANALYTE	Chemical Abstract Service Number	CLEANUP GOALS	SAMPLE INFORMATION	CHEMICAL ANALYSES RESULTS (mg/kg)			
		Remedial Action Plan Cleanup Goal Commercial (mg/kg)	SAMPLE LOCATION	ROW8	Dup23	ROW8	ROW8
			SAMPLE DEPTH (FEET BGS)	0.5 - 2	ROW8 (0.5-2)	2 - 4	4 - 6
			SAMPLE DATE	10/5/2021	10/5/2021	10/5/2021	10/5/2021
PCBs							
PCB, Total	1336-36-3	8.66		**5.19**	**4.93**	**1.74**	**0.272**

PCBs - Polychlorinated Biphenyls.
Results above RL are shown in **bold**. Results exceeding one or more criteria are shaded, as are the criteria which were exceeded.
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