



November 23, 2021

Project No. 20140391

**Mr. Paul Grittner**

Wisconsin Department of Natural Resources  
141 NW Barstow Street  
Waukesha, WI 53188

**SUPERIOR LINENS (BRRTS #02-41-532649) REMEDIAL ACTION WORKPLAN – UPRR RIGHT-OF-WAY, PARCEL NO. 6319999000, CUDAHY, WISCONSIN**

Dear Paul Grittner:

On behalf of Union Pacific Railroad (UPRR), Golder Associates Inc. (Golder) is submitting this remedial action workplan for the UPRR right-of-way (ROW) property (Parcel No. 6319999000) located adjacent to the Superior Linens site, Wisconsin Department of Natural Resources (WDNR) Bureau for Remediation and Redevelopment Tracking System (BRRTS) #02-41-532649, Facility #241780880.

As part of site investigation activities completed by the Superior Linens property owner, D&C Partners, LLP (D&C), contamination has been identified within the UPRR ROW. According to a letter dated September 9, 2020 from WDNR, *Review of D&C Partners Response to WDNR's June 3, 2020 Correspondence*; to obtain closure, a cap must be maintained in areas where soil contaminant concentrations exceed the direct contact residual contaminant level at depths shallower than four feet. The letter also stated that no additional capping was required to address the groundwater contamination as the plume appears to be stable.

Following the review of the WDNR correspondence and data collected by D&C's consultant, St. John – Mittelhauser & Associates, Inc. (SM&A) and presented in the February 21, 2020 *Site Investigation / Remedial Action Options and Remedial Design Report*, UPRR requested that a contaminated soil excavation be considered as an alternative remedial action option within the UPRR ROW. Mr. Steven Swenson (SM&A) confirmed via e-mail correspondence on November 24, 2020 to Mr. Kevin Peterburs (UPRR) that a contaminated soil excavation had been accepted by the WDNR as an alternative remedial action within the UPRR ROW.

Golder conducted a topographic survey of the site on July 20, 2021. From this survey, a shoring review was conducted that determined shoring would be required to support the rail embankment during the excavation. It was determined that excavating within the embankment of the active rail line would present undesired risk and increased project cost. Therefore, to determine if the extent of direct contact standard soil exceedances extends as far west as SM&A initially assumed, Golder collected additional soil samples with a hand auger in October and November 2021 to delineate the extent of soil exceedances. Based on the results obtained, revised excavation limits are being proposed. The additional soil sample locations, analytical results, and proposed new excavation limits are shown in the attached figures.

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Golder Associates Inc.  
809 Delta Avenue, Gladstone, Michigan, USA 49837

T: +1 906 420-8410 F: +1 906 420-8414

This remedial action workplan for a contaminated soil excavation within the UPRR ROW is submitted as part of the Superior Linens site closure strategy on UPRR property only and does not address remedial actions associated with the adjacent Superior Linens property.

## 1.0 SITE LOCATION

Site Name: Superior Linens  
BRRTS #02-41-532649  
Facility ID #241780880

Address: 5005 S. Packard Avenue, Cudahy, Wisconsin (Superior Linens)  
3425 East Layton Avenue, Cudahy, Wisconsin, Parcel No. 6319999000 (UPRR ROW)

Location: SE ¼ of the NW ¼ of Section 26, Township 6 North, Range 22 East  
Latitude: 42.9536959 North  
Longitude: -87.8609509 West

## 2.0 SITE CONTACTS

The property owner contact and address for the UPRR ROW property is as follows:

Mr. Kevin Peterburs  
Manager, Environmental Site Remediation  
Union Pacific Railroad Company  
4823 N 119<sup>th</sup> Street  
Milwaukee, WI 53225  
(414) 267-4164

The consultant contact and address for the UPRR ROW property is as follows:

Mr. Matthew Wilson, PG  
Project Engineer  
Golder Associates USA Inc.  
1133 Quail Court, Suite 115  
Pewaukee, WI 53072  
(262) 212-4727

## 3.0 BACKGROUND INFORMATION

Golder has reviewed the following documents associated with the Superior Linens site:

- *Site Investigation / Remedial Action Options and Remedial Design Report (RAORDR)*, SM&A, February 21, 2020
- *Site Investigation/Remedial Options and Remedial Design Report – Superior Health Linens 5005 South Packard Ave BRRTS 02-41-532649 FID 241780880 Letter*, WDNR, June 3, 2020
- *D&C Partners Response to WDNR’s June 3, 2020 Correspondence Letter*, SM&A, July 10, 2020
- *Review of D&C Partners Response to WDNR’s June 3, 2020 Correspondence Letter*, WDNR, September 9, 2020

As part of the site investigation activities for the Superior Linens site, six soil borings (HP-1 through HP-6) were completed by SMA within the UPRR ROW stormwater ditch in 2016. According to the RAORDR, laboratory results of soils sampled from these borings reported a concentration of trichloroethene above the industrial direct contact residual contaminant level (IDC-RCL) criterion in soil boring HP-6 from the 2-3 feet below ground surface (bgs) interval. Concentrations of trichloroethene (TCE), tetrachloroethene (PCE), and cis-1,2-dichloroethene (DCE) were reported above laboratory method detection limits (MDLs) in soil borings HP-1 and HP-2, but these concentrations do not exceed the applicable IDC-RCL criteria. Boring locations and soil sample laboratory results conducted by SMA are depicted in Attachment 1 – SM&A Figure 25, Proposed Engineered Barrier Over Samples Exceeding Industrial Direct Contact RCLs.

As part of Golder’s delineation activities for the Superior Linens site, 28 soil borings (HA-1 through HA-28) were completed within the UPRR ROW stormwater ditch in October and November 2021 to address direct contact exceedance concerns. The soil boring locations and draft analytical results for HA1 through HA-21 are shown in Figure 1. Analytical data is considered in a draft condition as third party quality assurance and quality control checks are ongoing. HA-22 through HA-28, shown in Figure 2, are planned soil boring locations that are schedule to be conducted on November 23, 2021. IDC-RCL exceedances for TCE were found in HA-2, HA-4, HA-6, HA-8, HA-10, HA-16, HA-18, HA-20, and HA-21. Concentrations of TCE, PCE, DCE, and benzene were reported above laboratory MDLs in additional soil borings, but these concentrations do not exceed the applicable IDC-RCL criteria.

## 4.0 PROPOSED REMEDIAL ACTION

As approved by WDNR, UPRR will complete a contaminated soil excavation to address the existing industrial direct contact risk within the UPRR ROW stormwater ditch. This proposed remedial action addresses the risk identified within the UPRR ROW only and does not address remedial actions associated with the adjacent Superior Linens property.

### 4.1 Contaminated Soil Excavation

In accordance with the Wisconsin Administrative Code Chapter NR 724, Golder will complete a Design Report (NR 724.09) as well as Design Plans and Specifications (NR 724.11) detailing the remedial action within the UPRR ROW, engineering criteria, proposed schedule, and other pertinent information.

#### 4.1.1 Excavation Activities

The pre-construction survey conducted to generate the shoring report was utilized to support the design of the contaminated soil excavation. Clearing and grubbing of vegetation will occur to clear the excavation limits; the pre-construction survey does not indicate any trees with a diameter greater than 6 inches will need to be removed. The installation of silt fencing will occur around the excavation limits and along the pavement edge to minimize any incidental transportation of contaminated soil on site. The excavation of the soil within the excavation limits will be conducted to a depth of four feet below the ground surface. The excavated area will be backfilled with a suitable material, conducted with the material placed in 6-inch lifts that are compacted prior to the placement of the subsequent lift. The excavated limits will be restored with the placement of topsoil, grass seed, and biodegradable erosion control matting.

### 4.1.2 Excavation Limits

As a basis for the soil excavation limits, Golder will utilize the results of the hand auger samples collected in October and November 2021. The eastern excavation limit will be the existing asphalt surface on the Superior Health Linens property that serves as a cap. The southern excavation limit will be defined by the hand auger samples HA-11, HA-12, HA-13, and HA-14 where no ID-RCL exceedances occurred. The western excavation limit will be defined by the hand auger samples HA-9, HA-7, HA-5, HA-3, HA-1, HA-15, HA-17, and HA-19 where no ID-RCL exceedances occurred. Hand auger locations HA-22 through HA-28 have not been collected to date and will be used to define the excavation limits in the northern portion of the site. The excavation limits will be adjusted to contain the area identified as ID-RCL exceedances. The samples collected to date allow for the western and southern excavation limits to be defined.

### 4.2 Confirmation Soil Sampling

Confirmation soil sampling will be completed prior to backfilling the excavation. Soil samples will be collected from one location on each sidewall at two depths: 0-2 feet bgs and 2-4 feet bgs. One soil sample will be collected from the base of the excavation. Soil samples will be submitted to a laboratory for the analysis of trichloroethene.

### 4.3 Excavated Soil Characterization and Disposal

Excavated soil will be sampled for contaminants of concern and additional parameters as required by the licensed disposal facility. Appropriate documentation will be obtained prior to the transport and disposal of contaminated soil at a licensed facility.

## 5.0 CONSTRUCTION DOCUMENTATION REPORT

Following the contaminated soil excavation activities, Golder will complete a Construction Documentation Report (NR 724.15) for WDNR submittal detailing the remedial action executed within the UPRR ROW. Golder assumes that no long-term monitoring or operation and maintenance is required following the contaminated soil excavation.

Sincerely,

**Golder Associates Inc.**

Matthew Wilson, PG  
*Project Geologist*

Mark A. Bergeon, PG  
*Program Leader-Railroad Services, Associate*

MJW/MAB

CC: Kevin Peterburs, UPRR

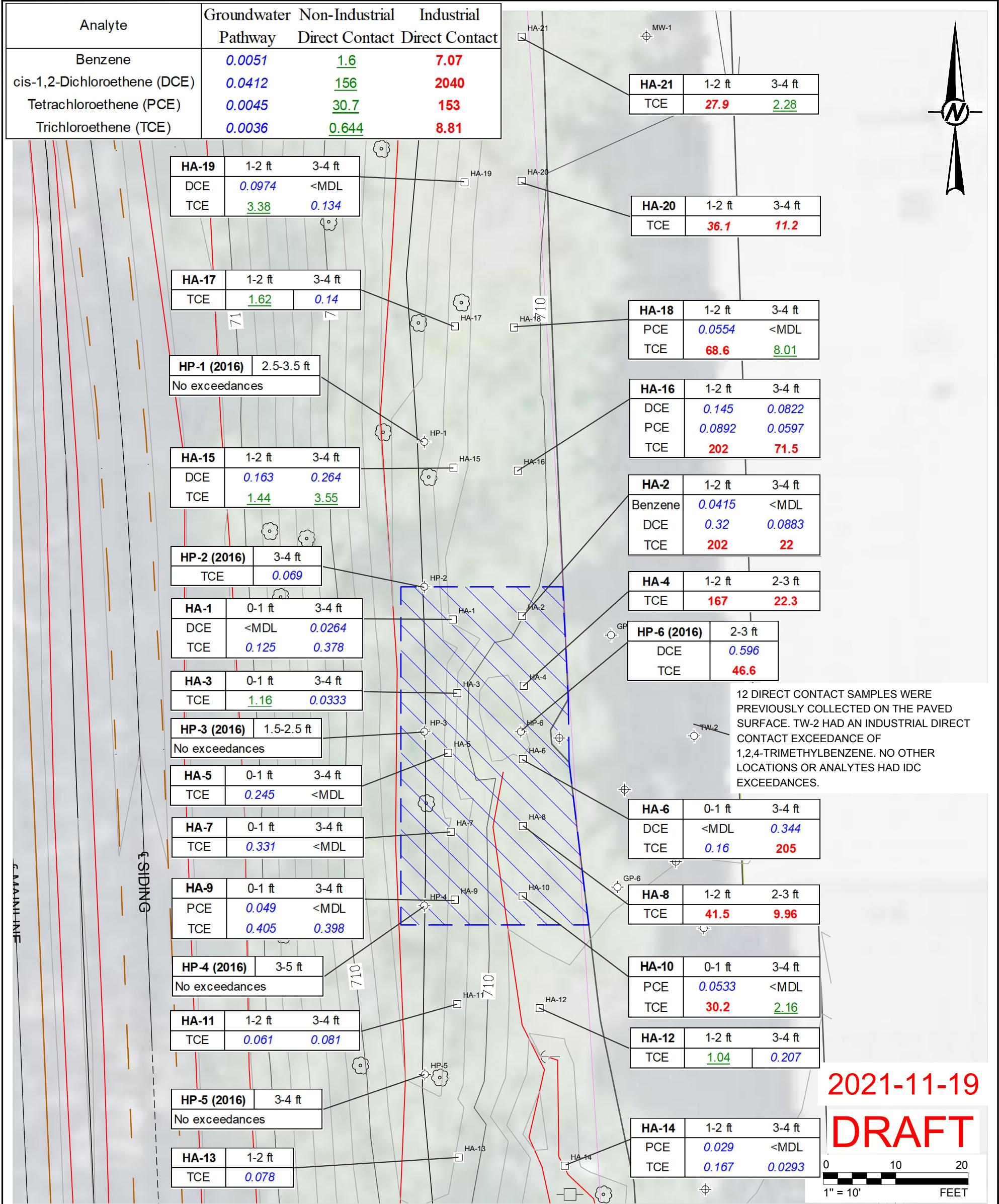
Figure 1 - Soil  
Analytical  
Results

Attachments:

Figure 1 - Soil Analytical Results, Golder, 2021-11-19

Figure 2 - Excavation Limits, Golder, 2021-11-19

Attachment 1 - SM&A Figure 25 Proposed Engineered Barrier Over Samples Exceeding Industrial Direct Contact RCLs



**NOTES**

- PRE-CONSTRUCTION SURVEY CONDUCTED BY BENESCH ON JULY 2021 COLLECTED GROUND SURFACE ELEVATION, RAIL LOCATION, AND SITE FEATURES.
- EXCAVATION LIMITS, AND 2016 BOREHOLE LOCATIONS AND ANALYTICAL RESULTS AS SPECIFIED BY SMA'S FEBRUARY 21, 2020 SITE INVESTIGATION / REMEDIAL ACTION OPTIONS AND REMEDIAL DESIGN REPORT.
- WISCONSIN DIGGERS HOTLINE TICKET MUST BE VALID PRIOR TO GROUND DISTURBANCE WORK COMMENCING: (800) 242-8511.
- UPRR CALL BEFORE YOU DIG (CBUD) FIELD TICKET MUST BE VALID PRIOR TO GROUND DISTURBANCE WORK COMMENCING: (800) 336-9193.
- PRIVATE LOCATE REQUIRED BEFORE GROUND DISTURBANCE WORK COMMENCING. SOFT DIG SERVICES MAY BE REQUIRED IF UTILITIES ARE LOCATED WITHIN THE PLANNED EXCAVATION AREA.

LEGEND	
	RAILS (SEE NOTE 1)
	RAIL LINE CENTERLINE
	DRAINAGE CENTERLINE
	PROPERTY LINE
	EDGE OF PAVEMENT
	SLOPE BREAKS
	PREVIOUS EXCAVATION LIMITS
	TREE
	MONITOR WELL
	2016 BOREHOLE
	UTILITY POLE
	2021 HAND AUGER LOCATION
	TEMPORARY WORKSPACE

REV. YYYY-MM-DD DESCRIPTION

DESIGNED PREPARED REVIEWED APPROVED

SEAL

CLIENT  
UNION PACIFIC RAILROAD COMPANY  
ENVIRONMENTAL SITE REMEDIATION

PROJECT  
SUPERIOR LINENS REMEDIATION  
UPRR RIGHT-OF-WAY  
CUDAHY, WISCONSIN

CONSULTANT

GOLDER - PEWAUKEE  
1133 QUAIL CT, SUITE 115  
PEWAUKEE, WI 53072  
USA  
262-212  
www.golder.com

TITLE  
**SOIL ANALYTICAL RESULTS**

PROJECT NO. 20140391 TASK 240 REV. C 1 of 2 SHEET 1



IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM ANSI B



- NOTES**
1. PRE-CONSTRUCTION SURVEY CONDUCTED BY BENESCH ON JULY 2021 COLLECTED GROUND SURFACE ELEVATION, RAIL LOCATION, AND SITE FEATURES.
  2. EXCAVATION LIMITS, AND 2016 BOREHOLE LOCATIONS AND ANALYTICAL RESULTS AS SPECIFIED BY SMA'S FEBRUARY 21, 2020 SITE INVESTIGATION / REMEDIAL ACTION OPTIONS AND REMEDIAL DESIGN REPORT.
  3. WISCONSIN DIGGERS HOTLINE TICKET MUST BE VALID PRIOR TO GROUND DISTURBANCE WORK COMMENCING: (800) 242-8511.
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  5. PRIVATE LOCATE REQUIRED BEFORE GROUND DISTURBANCE WORK COMMENCING. SOFT DIG SERVICES MAY BE REQUIRED IF UTILITIES ARE LOCATED WITHIN THE PLANNED EXCAVATION AREA.

LEGEND	
— (dashed)	RAILS (SEE NOTE 1)
— (dotted)	RAIL LINE CENTERLINE
— (dotted)	DRAINAGE CENTERLINE
— (solid)	PROPERTY LINE
— (solid)	EDGE OF PAVEMENT
— (dashed)	SLOPE BREAKS
— (dashed)	TEMPORARY WORKSPACE LIMIT
▨ (hatched)	POTENTIAL EXCAVATION LIMITS
⊙ (circle with dot)	TREE
⊙ (circle with cross)	MONITOR WELL
⊙ (circle with dot)	2016 BOREHOLE
□ (square)	UTILITY POLE
□ (square)	2021 HAND AUGER LOCATION
— (line with circles)	SILT FENCE

SEAL

REV. YYYY-MM-DD DESCRIPTION

CLIENT  
UNION PACIFIC RAILROAD COMPANY  
ENVIRONMENTAL SITE REMEDIATION

CONSULTANT



GOLDER - PEWAUKEE  
1133 QUAIL CT, SUITE 115  
PEWAUKEE, WI 53072  
USA  
262-212  
www.golder.com

DESIGNED PREPARED REVIEWED APPROVED

PROJECT  
SUPERIOR LINENS REMEDIATION  
UPRR RIGHT-OF-WAY  
CUDAHY, WISCONSIN

TITLE  
**EXCAVATION LIMITS**

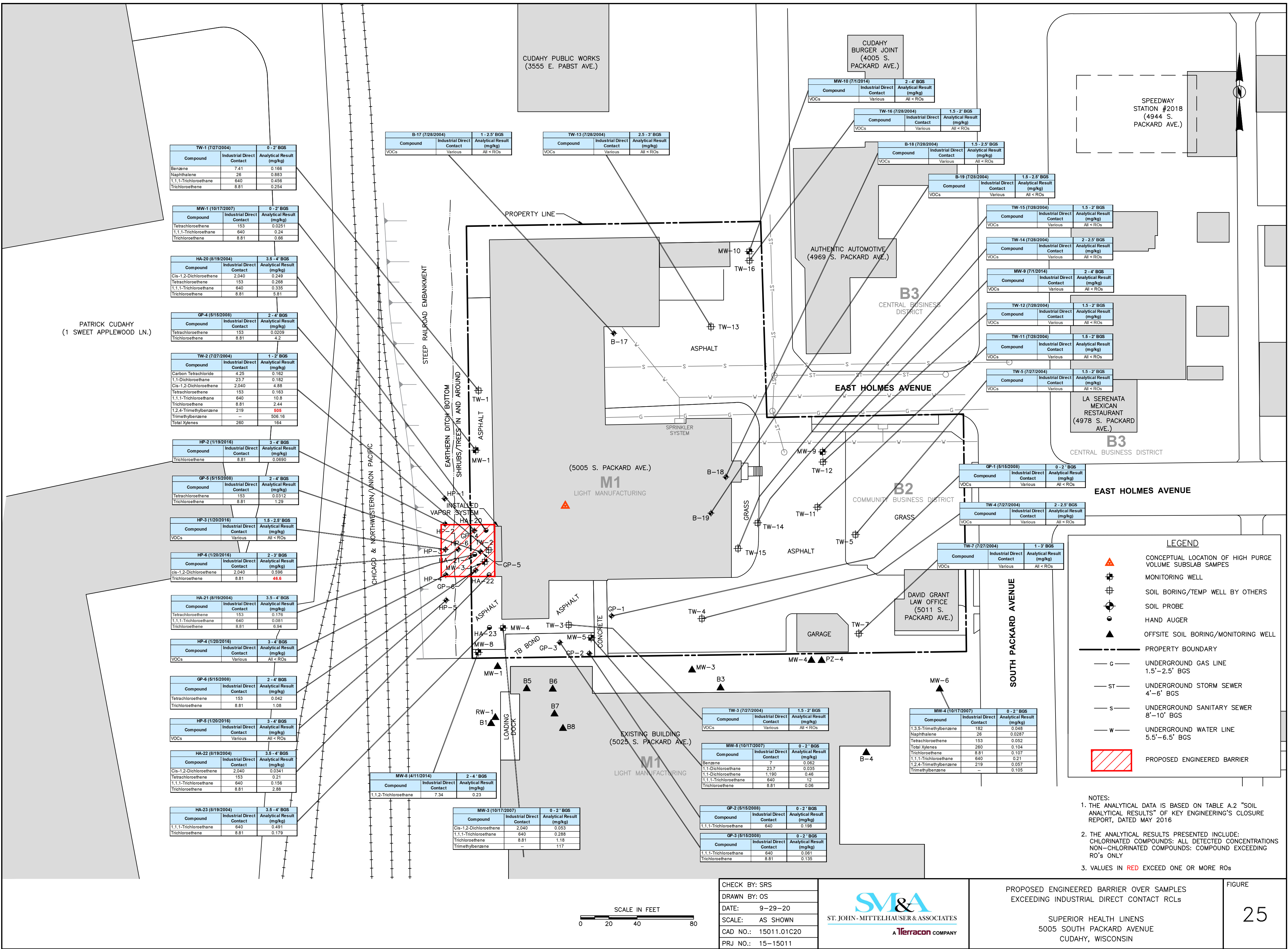
PROJECT NO.	TASK	REV.	2 of 2	SHEET
20140391	240	C		2

IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM ANSI B



**ATTACHMENT 1**

**SM&A Figure 25 Proposed  
Engineered Barrier Over Samples  
Exceeding Industrial Direct Contact  
RCLs**



**TW-1 (7/27/2004) 0 - 2' BGS**

Compound	Industrial Direct Contact	Analytical Result (mg/kg)
Benzene	7.41	0.166
Naphthalene	28	0.883
1,1,1-Trichloroethane	640	0.456
Trichloroethane	8.81	0.254

**MW-1 (10/17/2007) 0 - 2' BGS**

Compound	Industrial Direct Contact	Analytical Result (mg/kg)
Tetrachloroethene	153	0.0251
1,1,1-Trichloroethane	640	0.24
Trichloroethane	8.81	0.66

**HA-20 (8/19/2004) 3.5 - 4' BGS**

Compound	Industrial Direct Contact	Analytical Result (mg/kg)
Cis-1,2-Dichloroethene	2,040	0.249
Tetrachloroethene	153	0.268
1,1,1-Trichloroethane	640	0.335
Trichloroethane	8.81	3.81

**GP-4 (5/15/2008) 2 - 4' BGS**

Compound	Industrial Direct Contact	Analytical Result (mg/kg)
Tetrachloroethene	153	0.0209
Trichloroethane	8.81	4.2

**TW-2 (7/27/2004) 1 - 2' BGS**

Compound	Industrial Direct Contact	Analytical Result (mg/kg)
Carbon Tetrachloride	4.25	0.162
1,1-Dichloroethane	23.7	0.182
Cis-1,2-Dichloroethene	2,040	4.88
Tetrachloroethene	153	0.163
1,1,1-Trichloroethane	640	10.8
Trichloroethane	8.81	2.44
1,2,4-Trimethylbenzene	219	805
Trimethylbenzene	-	505.16
Total Xylenes	260	154

**HP-2 (1/19/2016) 3 - 4' BGS**

Compound	Industrial Direct Contact	Analytical Result (mg/kg)
Trichloroethane	8.81	0.0690

**GP-5 (5/15/2008) 2 - 4' BGS**

Compound	Industrial Direct Contact	Analytical Result (mg/kg)
Tetrachloroethene	153	0.0312
Trichloroethane	8.81	1.29

**HP-3 (1/20/2016) 1.5 - 2.5' BGS**

Compound	Industrial Direct Contact	Analytical Result (mg/kg)
VOCs	Various	All < ROs

**HP-8 (1/20/2016) 2 - 3' BGS**

Compound	Industrial Direct Contact	Analytical Result (mg/kg)
Cis-1,2-Dichloroethene	2,040	0.598
Trichloroethane	8.81	46.6

**HA-21 (8/19/2004) 3.5 - 4' BGS**

Compound	Industrial Direct Contact	Analytical Result (mg/kg)
Tetrachloroethene	153	0.176
1,1,1-Trichloroethane	640	0.081
Trichloroethane	8.81	6.94

**HP-4 (1/20/2016) 3 - 4' BGS**

Compound	Industrial Direct Contact	Analytical Result (mg/kg)
VOCs	Various	All < ROs

**GP-6 (5/15/2008) 2 - 4' BGS**

Compound	Industrial Direct Contact	Analytical Result (mg/kg)
Tetrachloroethene	153	0.042
Trichloroethane	8.81	1.08

**HP-5 (1/20/2016) 3 - 4' BGS**

Compound	Industrial Direct Contact	Analytical Result (mg/kg)
VOCs	Various	All < ROs

**HA-22 (8/19/2004) 3.5 - 4' BGS**

Compound	Industrial Direct Contact	Analytical Result (mg/kg)
Cis-1,2-Dichloroethene	2,040	0.5341
Tetrachloroethene	153	0.21
1,1,1-Trichloroethane	640	0.156
Trichloroethane	8.81	2.88

**HA-23 (8/19/2004) 3.5 - 4' BGS**

Compound	Industrial Direct Contact	Analytical Result (mg/kg)
1,1,1-Trichloroethane	640	0.491
Trichloroethane	8.81	0.179

**B-17 (7/28/2004) 1 - 2.5' BGS**

Compound	Industrial Direct Contact	Analytical Result (mg/kg)
VOCs	Various	All < ROs

**TW-13 (7/28/2004) 2.5 - 3' BGS**

Compound	Industrial Direct Contact	Analytical Result (mg/kg)
VOCs	Various	All < ROs

**MW-16 (7/1/2014) 2 - 4' BGS**

Compound	Industrial Direct Contact	Analytical Result (mg/kg)
VOCs	Various	All < ROs

**TW-16 (7/28/2004) 1.5 - 2' BGS**

Compound	Industrial Direct Contact	Analytical Result (mg/kg)
VOCs	Various	All < ROs

**B-18 (7/28/2004) 1.5 - 2.5' BGS**

Compound	Industrial Direct Contact	Analytical Result (mg/kg)
VOCs	Various	All < ROs

**B-19 (7/28/2004) 1.5 - 2.5' BGS**

Compound	Industrial Direct Contact	Analytical Result (mg/kg)
VOCs	Various	All < ROs

**TW-15 (7/28/2004) 1.5 - 2' BGS**

Compound	Industrial Direct Contact	Analytical Result (mg/kg)
VOCs	Various	All < ROs

**TW-14 (7/28/2004) 2 - 2.5' BGS**

Compound	Industrial Direct Contact	Analytical Result (mg/kg)
VOCs	Various	All < ROs

**MW-9 (7/1/2014) 2 - 4' BGS**

Compound	Industrial Direct Contact	Analytical Result (mg/kg)
VOCs	Various	All < ROs

**TW-12 (7/28/2004) 1.5 - 2' BGS**

Compound	Industrial Direct Contact	Analytical Result (mg/kg)
VOCs	Various	All < ROs

**TW-11 (7/28/2004) 1.5 - 2' BGS**

Compound	Industrial Direct Contact	Analytical Result (mg/kg)
VOCs	Various	All < ROs

**TW-5 (7/27/2004) 1.5 - 2' BGS**

Compound	Industrial Direct Contact	Analytical Result (mg/kg)
VOCs	Various	All < ROs

**GP-1 (5/15/2008) 0 - 2' BGS**

Compound	Industrial Direct Contact	Analytical Result (mg/kg)
VOCs	Various	All < ROs

**TW-4 (7/27/2004) 2 - 2.5' BGS**

Compound	Industrial Direct Contact	Analytical Result (mg/kg)
VOCs	Various	All < ROs

**TW-7 (7/27/2004) 1 - 3' BGS**

Compound	Industrial Direct Contact	Analytical Result (mg/kg)
VOCs	Various	All < ROs

**MW-4 (10/17/2007) 0 - 2' BGS**

Compound	Industrial Direct Contact	Analytical Result (mg/kg)
1,3,5-Trimethylbenzene	182	0.048
Naphthalene	28	0.0287
Tetrachloroethene	153	0.052
Total Xylenes	260	0.104
Trichloroethane	8.81	0.107
1,1,1-Trichloroethane	640	0.21
1,2,4-Trimethylbenzene	219	0.057
Trimethylbenzene	-	0.105

**TW-3 (7/27/2004) 1.5 - 2' BGS**

Compound	Industrial Direct Contact	Analytical Result (mg/kg)
VOCs	Various	All < ROs

**MW-8 (10/17/2007) 0 - 2' BGS**

Compound	Industrial Direct Contact	Analytical Result (mg/kg)
Benzene	7	0.052
1,1-Dichloroethane	23.7	0.035
1,1-Dichloroethene	1,190	0.46
1,1,1-Trichloroethane	640	12
Trichloroethane	8.81	0.08

**GP-2 (5/15/2008) 0 - 2' BGS**

Compound	Industrial Direct Contact	Analytical Result (mg/kg)
1,1,1-Trichloroethane	640	0.198

**GP-3 (5/15/2008) 0 - 2' BGS**

Compound	Industrial Direct Contact	Analytical Result (mg/kg)
1,1,1-Trichloroethane	640	0.061
Trichloroethane	8.81	0.135

**MW-3 (10/17/2007) 0 - 2' BGS**

Compound	Industrial Direct Contact	Analytical Result (mg/kg)
Cis-1,2-Dichloroethene	2,040	0.053
1,1,1-Trichloroethane	640	0.288
Trichloroethane	8.81	1.18
Trimethylbenzene	-	117

**MW-8 (4/11/2014) 2 - 4' BGS**

Compound	Industrial Direct Contact	Analytical Result (mg/kg)
1,1,2-Trichloroethane	7.34	0.23

**LEGEND**

- ▲ CONCEPTUAL LOCATION OF HIGH PURGE VOLUME SUBSLAB SAMPLES
- ⊕ MONITORING WELL
- ⊕ SOIL BORING/TEMP WELL BY OTHERS
- ⊕ SOIL PROBE
- ⊕ HAND AUGER
- ▲ OFFSITE SOIL BORING/MONITORING WELL
- PROPERTY BOUNDARY
- G — UNDERGROUND GAS LINE 1.5'-2.5' BGS
- ST — UNDERGROUND STORM SEWER 4'-6' BGS
- S — UNDERGROUND SANITARY SEWER 8'-10' BGS
- W — UNDERGROUND WATER LINE 5.5'-6.5' BGS
- ▨ PROPOSED ENGINEERED BARRIER

- NOTES:**
1. THE ANALYTICAL DATA IS BASED ON TABLE A.2 "SOIL ANALYTICAL RESULTS" OF KEY ENGINEERING'S CLOSURE REPORT, DATED MAY 2016
  2. THE ANALYTICAL RESULTS PRESENTED INCLUDE: CHLORINATED COMPOUNDS; ALL DETECTED CONCENTRATIONS NON-CHLORINATED COMPOUNDS; COMPOUND EXCEEDING RO'S ONLY
  3. VALUES IN RED EXCEED ONE OR MORE ROs

CHECK BY: SRS  
 DRAWN BY: OS  
 DATE: 9-29-20  
 SCALE: AS SHOWN  
 CAD NO.: 15011.01C20  
 PRJ NO.: 15-15011



PROPOSED ENGINEERED BARRIER OVER SAMPLES EXCEEDING INDUSTRIAL DIRECT CONTACT RCLs  
 SUPERIOR HEALTH LINENS  
 5005 SOUTH PACKARD AVENUE  
 CUDAHY, WISCONSIN

