State of Wisconsin
Governor Scott Walker

Department of Agriculture, Trade and Consumer Protection
Ben Brancel, Secretary

April 1, 2014

Scott Dalberg, President
Great Lakes Components, LLC
496 Pine Street
Burlington, WI 53105

DATCP Case #95414052499

SUBJECT: Re-opened Case – Former Cooperative Plus Fertilizer Plant
311 W Centralia Street, Elkhorn, Wisconsin

Dear Mr. Dalberg:

On March 31, 2014 the Department of Agriculture, Trade and Consumer Protection (DATCP) received notification from Kapur & Associates, LLC (Kapur), on your behalf, that you are in the process of purchasing the property at 311 W Centralia Street, in Elkhorn, Wisconsin, and that you intend to undertake construction activities on the property. In response to the notification provided by Kapur, DATCP has re-opened the case referenced above.

This property was formerly used to handle and store agricultural chemicals (fertilizer and pesticides), and an environmental remediation case addressing releases of agricultural chemicals at the site was closed on November 10, 2011, with continuing obligations. As the enclosed case closure letter and site map indicate, residually contaminated soil and groundwater were present beneath the property at the time of case closure and, pursuant to s. 292.12, Wis. Stats., compliance with the requirements of the letter is a responsibility to which all property owners must adhere. While the enclosed letter and map provide some description of the nature and location of residual contamination, more detailed information is available in the Department of Natural Resources (DNR) GIS Registry database at the following internet address: http://dnrmaps.wi.gov/efiles/Ser/WALWORTH/02%20ERP/0265547256/0265547256.pdf . In addition, the full case file is available for review at our office at 2811 Agriculture Drive in Madison.

Based on our review of project plans provided by Kapur, it appears that the planned activities may encounter residually contaminated soil on the site. Accordingly, we request that you submit for our review a soil management plan (SMP) that describes your plans for managing contaminated soil during construction at the site. The SMP should include details concerning specific locations where you anticipate that construction activities will encounter contaminated soil, procedures for characterizing excavated or exposed soil (including sampling methods and laboratory analytical methods), and details of planned handling and disposition of soils.

Please note that no soil may be removed from the property without prior approval from DATCP. As we understand that the project plan includes placement of excavated soil on an adjacent property parcel, coordination with and approval from DNR will also be required. If dewatering is necessary during construction, additional DNR approvals or permits may be necessary. You will be responsible for compliance with any required state and local permits.

Please contact me at trevor.bannister@wisconsin.gov or 608-224-4514 if you have any questions regarding this case.

Sincerely,

Trevor Bannister
Hydrogeologist

Enc.

cc: Paul VanHenkelum, Kapur (via electronic mail)
Jeff Saatkamp, DATCP (via electronic mail)
Mark Drews, DNR (via electronic mail)
Sam Tapson, City of Elkhorn

State of Wisconsin
Governor Scott Walker

Department of Agriculture, Trade and Consumer Protection
Ben Brancel, Secretary

November 10, 2011

Mr. Sam Tapson
City of Elkhorn
P.O. Box 920
Elkhorn, WI 53121-0920

Re: Final Case Closure with Land Use Limitations or Conditions
Former Cooperative Plus Agronomy Center, 311 W Centralia St., Elkhorn, Wisconsin
DATCP Case #95414052499; BRRTS No. 02-65-547256

Dear Mr. Tapson:

On October 10, 2011, our 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 October 12, 2011, you were notified that the Closure Committee had agreed that this case was conditionally eligible for closure, pending the abandonment of groundwater monitoring wells on the property.

On November 2, 2011, the Department received correspondence indicating that you have complied with the requirements for case closure, specifically the submittal of forms documenting the abandonment of monitoring wells. Based on the correspondence and data provided, it appears that your case meets the requirements of ch. NR 726, Wis. Adm. Code. The Department considers this case closed and no further investigation or remediation is required at this time.

GIS Registry

The conditions of case closure set out below in this letter require that your site be listed on the Wisconsin Department of Natural Resources (DNR) Remediation and Redevelopment (RR) Program's Geographical Information Systems Registry (GIS Registry) of contaminated sites. The specific reasons are summarized below:

- Residual soil contamination exists that must be properly managed should it be excavated or removed
- If a structural impediment that obstructs a complete site investigation or cleanup is removed or modified, additional environmental work must be completed
- Groundwater contamination is present above ch. NR 140, Wis. Adm. Code, enforcement standards (ESs)

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 the RR Sites Map page at 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://dnr.wi.gov/org/water/dwg/3300254.pdf or at the web address listed above for the GIS Registry.

Closure Conditions

Please be aware that pursuant to s. 292.12, Wis. Stats., compliance with the requirements of this letter is a responsibility to which you 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, Wis. Stats., 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.

Remaining Residual Soil Contamination

Residual fertilizer soil contamination remains at the approximate locations shown on Figure 3 (and in greater detail on subsequent figures) of Alpha Terra Science's (Alpha Terra) GIS Registry package. The GIS Registry package can be viewed at http://dnr.wi.gov/org/aw/rr/gis/index.htm. If residual contaminated soil is excavated in the future, then the property owner at the time of excavation must sample and analyze the excavated soil to determine if residual contamination remains (requirement pursuant to ch. NR 718, Wis. Adm. Code, and ch. 289, Wis. Stats., and chs. NR 500 to 536, Wis. Ad,. Code, may also apply). 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 standards 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 a direct contact hazard and as a result special precautions may need to be taken to prevent a direct contact health threat to humans.

Structural Impediments

Structural impediments existing at the time of cleanup, including the rail spur, the railroad main line, and subsurface utilities, made complete remediation of the soil contamination on this property impracticable. Pursuant to s. 292.12(2)(b), Wis. Stats., if the structural impediments on this property that are described above are removed, the property owner shall conduct an investigation of the degree and extent of fertilizer contamination. If contamination is found at that time, the Department shall be immediately notified and the contamination shall be properly remediated in accordance with applicable statutes and rules. If soil in the specific locations described above is excavated, 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 a direct contact hazard and as a result special precautions may need to be taken during excavation activities to prevent a health threat to humans.

Remaining Residual Groundwater Contamination

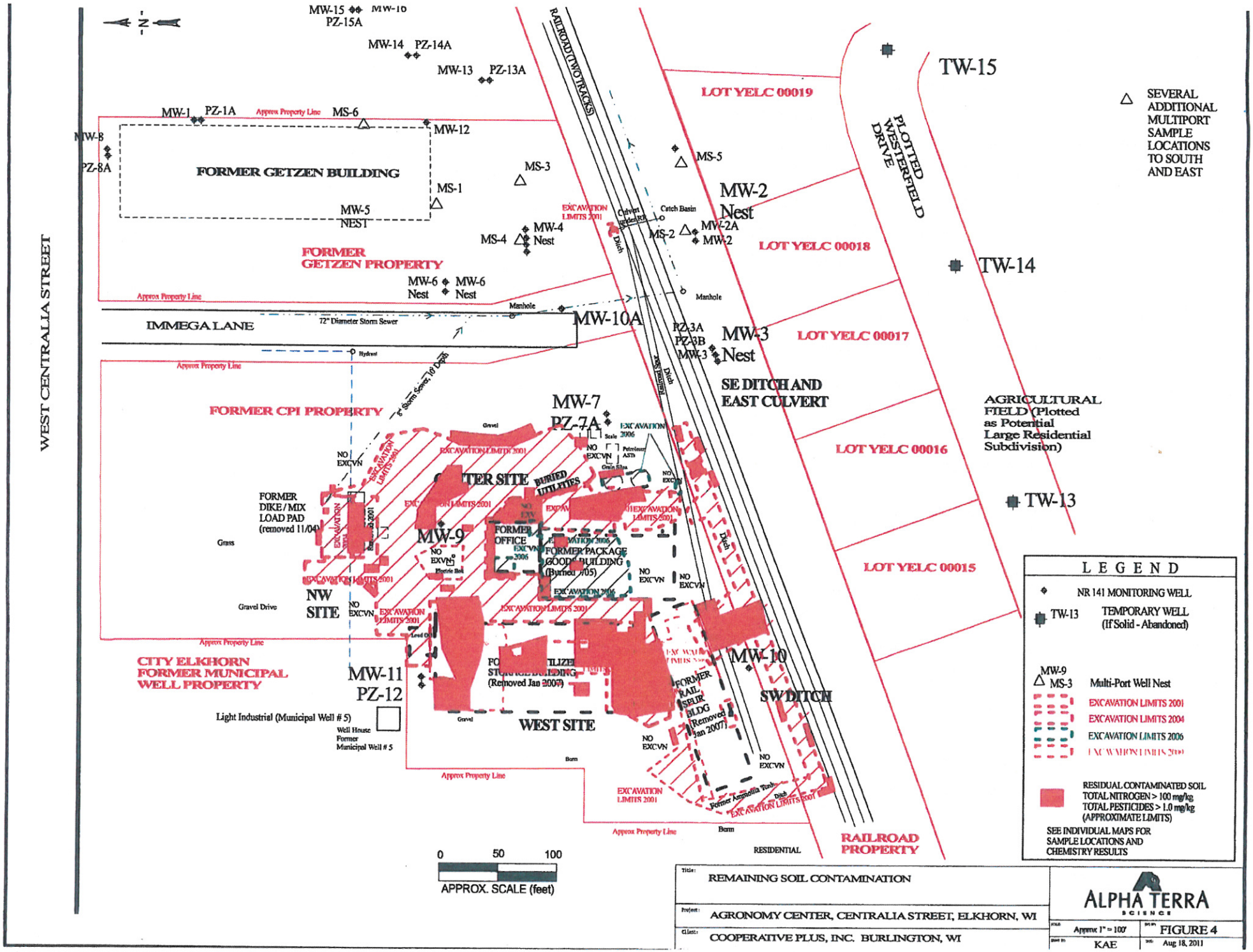
Groundwater impacted by nitrates and ammonia (nitrogen) contamination greater than enforcement standards set forth in ch. NR140, Wis. Adm. Code, is present both on the contaminated property and off the contaminated property. Off-property owners have been notified of the presence of groundwater contamination.] For more detailed information regarding the locations where groundwater samples have been collected (i.e., monitoring well locations) and the associated contaminant concentrations, refer to the RR Program's GIS Registry at the RR Sites Map page at http://dnr.wi.gov/org/aw/rr/gis/index.htm.

The Department appreciates your efforts to restore the environment at this site. If you have any questions regarding this letter, please call me at 608-224-4514.

Sincerely,

Trevor Bannister
Hydrogeologist

cc: Jeff Saatkamp, DATCP
Mark Drews, DNR
Ken Ebbott, Alpha Terra


WEST CENTRALIA STREET
N
MW-15
PZ-15A
MW-16
MW-14
PZ-14A
MW-13
PZ-13A
RAILROAD (TWO TRACKS)
LOT YELC 00019
TW-15
PLOTTED WESTERFIELD DRIVE
SEVERAL ADDITIONAL MULTIPORT SAMPLE LOCATIONS TO SOUTH AND EAST
MW-1
PZ-1A
Approx Property Line
MS-6
MW-12
MW-8
PZ-8A
FORMER GETZEN BUILDING
MS-3
MS-1
MW-5
NEST
MS-5
MW-2
Nest
EXCAVATION LIMITS 2001
Culvert
Catch Basin
MS-4
MW-4
Nest
MS-2
MW-2A
MW-2
LOT YELC 00018
TW-14
FORMER GETZEN PROPERTY
MW-6
Nest
MW-6
Nest
Manhole
IMMEGA LANE
72" Diameter Storm Sewer
MW-10A
PZ-3A
PZ-3B
MW-3
Nest
MW-3
LOT YELC 00017
Hydrant
Approx Property Line
8" Storm Sewer, 16' Depth
SE DITCH AND EAST CULVERT
AGRICULTURAL FIELD (Plotted as Potential Large Residential Subdivision)
FORMER CPI PROPERTY
MW-7
PZ-7A
Gravel
EXCAVATION 2006
NO EXCVN
Petroleum ASTs
Grain Bins
EXCAVATION LIMITS 2001
LOT YELC 00016
TW-13
FORMER DIKE / MIX LOAD PAD (removed 11/04)
BURIED UTILITIES
MW-9
FORMER OFFICE
FORMER PACKAGE GOODS BUILDING (Burned 7/05)
Grass
Electric Box
Ditch
LOT YELC 00015
NW SITE
Gravel Drive
Load Out
MW-10
SW DITCH
CITY ELKHORN FORMER MUNICIPAL WELL PROPERTY
MW-11
PZ-12
FORMER RAIL SPUR BLDG (Removed Jan 2007)
Light Industrial (Municipal Well # 5)
Well House Former Municipal Well # 5
WEST SITE
Berm
Former Ammonia Tank
RESIDENTIAL
RAILROAD PROPERTY
0
50
100
APPROX. SCALE (feet)
LEGEND
NR 141 MONITORING WELL
TW-13 TEMPORARY WELL (If Solid - Abandoned)
MW-9
MS-3 Multi-Port Well Nest
EXCAVATION LIMITS 2001
EXCAVATION LIMITS 2004
EXCAVATION LIMITS 2006
EXCAVATION LIMITS 2007
RESIDUAL CONTAMINATED SOIL
TOTAL NITROGEN > 100 mg/kg
TOTAL PESTICIDES > 1.0 mg/kg
(APPROXIMATE LIMITS)
SEE INDIVIDUAL MAPS FOR SAMPLE LOCATIONS AND CHEMISTRY RESULTS
Title: REMAINING SOIL CONTAMINATION
Project: AGRONOMY CENTER, CENTRALIA STREET, ELKHORN, WI
Client: COOPERATIVE PLUS, INC. BURLINGTON, WI
ALPHA TERRA SCIENCE
Scale: Approx 1" = 100'
FIGURE 4
Drawn by: KAE
Date: Aug 18, 2011