KAPUR & ASSOCIATES, INC.

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April 14, 2014

Mr. Trevor Bannister, HydrogeologistWisconsin Dept. of Agriculture, Trade and Consumer Protection2811 Agriculture DriveP.O. Box 8911Madison, WI 53708-8911

Mr. Mark Drews, Hydrogeologist Wisconsin Dept. of Natural Resources 141 NW Barstow Street, Room 180 Waukesha, WI 53188

RE: Soil Management Plan Former Cooperative Plus Fertilizer Plant 311 W Centralia Street, Elkhorn, Wisconsin WDNR BRRTS# 02-65-547256 FID #265114630

Dear Sirs;

Kapur and Associates, Inc. (Kapur), on behalf of Great Lakes Components, LLC has completed a Soil Management Plan (SMP) for the Former Cooperative Plus Fertilizer Plant (Coop) site, parcel numbers YU SW 00046C and YU SW 00046D, located in the Southwest ¹/₄ of the Northeast ¹/₄ of Section 1, Township 2 North, Range 16 East on the south side of Centralia Street in the City of Elkhorn, Walworth County, Wisconsin (subject site or property). The site location and aerial photograph are included as Figures 1 and 2, respectively.

The Coop property formerly operated as an agricultural chemical (fertilizers and pesticides) storage and handler. Resulting from past operations, soil and groundwater contamination was identified onsite and the property listed on Emergency Repair Program (ERP) database. The contamination was investigated and remediated to the extent practical under the guidance of the Wisconsin Dept. of Agriculture, Trade and Consumer Protection (DATCP) and subsequently closed on November 10, 2011. Though no further investigative activities were required at the time of closure, the site was listed on the Wisconsin Dept. of Natural Resources (WDNR) Geographic Information System Registry (GIS) as residual soil contamination and impacted groundwater remained onsite.



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The Coop site is now in the final approval stages of proposed redevelopment and part of the development / grading plans involves construction of a drainage swale, via relocation of excavated site soils, and re-grading of the existing surface. As planned construction activities may encounter residual contaminated soils the following precautions and soil handling methods will be implemented:

- All soil excavated from within the Coop property boundaries will be relocated onto the adjoining property to the east (former Getzen Co., Inc. site WDNR BRRTS #02-65-001070 an open ERP site) along the northern property line creating a landscaped berm (see Sheet C103). The relocated soil berm is part of an agreement between the City of Elkhorn who currently owns the Former Getzen Co. property and Great Lakes Components, LLC with communication with the WDNR (awaiting final approval).
- Confirmation sampling and laboratory testing for ammonia, nitrate/nitrite, total nitrogen and total pesticides of the materials to be excavated and bermed will be completed to document contaminant concentrations of the soils being relocated.
- Closure sampling and laboratory testing for ammonia, nitrate/nitrite, total nitrogen and total pesticides following site excavation activities will be performed to attain additional data of the extent and concentrations of residual soil remaining onsite.
- The final site layout of the Coop site will include a main distribution facility, maintenance building, lumber storage, concrete drive and parking, and green space. All buildings are proposed slab-on-grade construction (see Sheet C102). An exterior concrete / asphalt storage pad is also proposed to be constructed on the Getzen property at 211 W. Centralia Street (adjacent to the east).
- Erosion control means will be implemented around the worksite as needed

We trust the included information meets your needs at this time to approve the proposed soil management plan. Should you have any questions, or require further information, please feel free to call my cell phone (414) 254-6358.

Sincerely, Kapur & Associates, Inc.

Travis W. Peterson

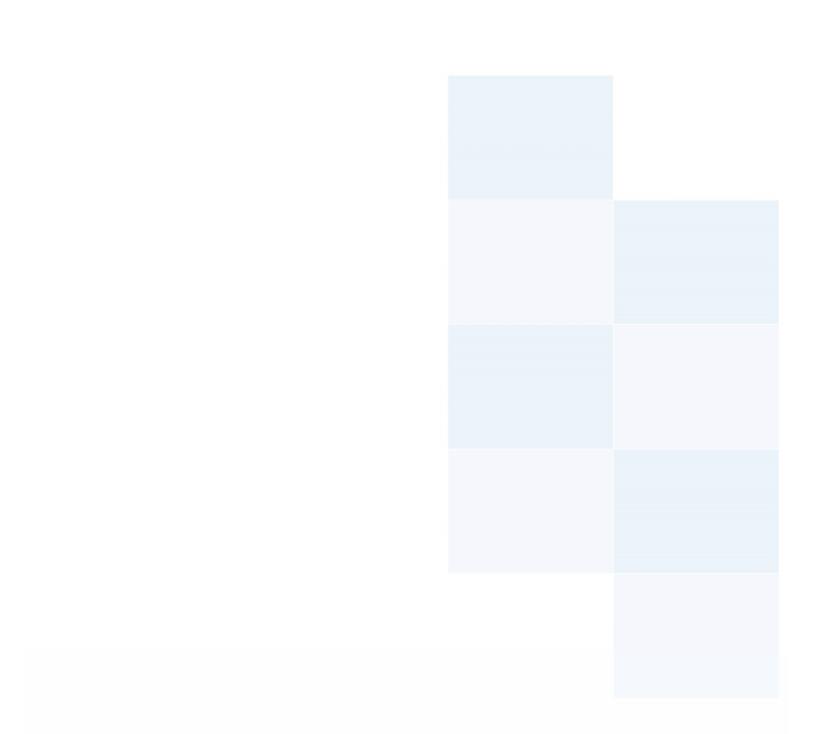
Travis W. Peterson Environmental Project Manager

Enc.



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cc: Mr. Scott Dalberg, Great Lakes Components, LLC Mr. Paul VanHenkelum, Kapur & Associates, Inc. Mr. Sam Tapson, City of Elkhorn





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