ENGINEERING
ARCHITECTURE
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OMNNI ASSOCIATES, INC.
ONE SYSTEMS DRIVE
APPLETON, WI 54914-1654
1-800-571-6677 920-735-6900
FAX 920-830-6100

October 25, 2016

Ms. Jennifer Borski, Hydrogeologist
Wisconsin Department of Natural Resources
625 East County Road Y, Suite 700
Oshkosh, Wisconsin 54901-9731

RE: Eagle Point Senior Living – Development at Historic Fill Site or Licensed Landfill Exemption Application. BRRTS ID #02-45-530084

Dear Ms. Borski:

A senior living development (Eagle Point Senior Living) is being proposed by IconiCare, LLC, on the Former Foremost Farms site located at 935 E. John Street in Appleton, Wisconsin. This work may take place near areas that have been filled with non-native soil materials. Enclosed are the Development at Historic Fill Site or Licensed Landfill Exemption Application (Form 4400-226 R 5/16), the Development at Historic Fill Site or Licensed Landfill Expedited Exemption Application (Form 4400-226A R 9/14) and supporting documentation in anticipation of encountering fill material. A check (check # 32230) for $700 is enclosed for the review fee.

If you have any questions on the enclosed information, please contact me at 920/830-6141 or by email at bwayner@omnni.com.

Sincerely,
OMNNI Associates, Inc.

Brian D. Wayner

Brian D. Wayner, P.E.
Environmental Manager

Enclosures

State of Wisconsin
Department of Natural Resources
PO Box 7921, Madison WI 53707-7921
dnr.wi.gov

Development at Historic Fill Site or Licensed Landfill Exemption Application

Form 4400-226 (R 05/16)

Notice: Use of this form is required by the DNR for any application to develop at a historic fill site or licensed landfill pursuant to secs. NR 506.085 and NR 500.08(4), Wis. Adm. Code. The Department will not consider your application unless you provide complete information requested. Personally identifiable information collected will be used to process your application and will also be accessible by request under Wisconsin's Open Records law [ss.19.31 - 19.39, Wis. Stats.]

Instructions: See *Development at Historic Fill Sites and Licensed Landfills: What you need to know* (PUB-RR-683, November 2013) for detailed instructions.

- All Exemption Application materials should be sent to the region where the site is located, as listed on page 6.
- Include $700 fee payment with this application. If the site is a licensed landfill and the Waste and Materials Management program is doing the review, submit no fee now. You will be sent an invoice upon receipt of this application.
- Determine the appropriate exemption type for the site and check appropriate box below.
- Provide complete information requested for each type of exemption. Include the following attachments:
  Required: Summary of Existing and Potential Impacts described in Section V as an attachment, under the seal of a professional engineer or geologist registered to practice in Wisconsin.

  Optional: Site Visit Summary Comments (Section IX) including any photos, sketches or site visit notes.

Exemption Type

☐ **Remediation and Redevelopment Program NR 700 Rule Series Process Exemption:** Site with remedial actions conducted in accordance with NR 700 series
Required: Sections I - VI ***Optional:*** Sections VII - X

☒ **Case-by-Case Evaluation:** Sites with anticipated environmental impacts or wastes of special concerns
Required: Sections I - VI ***Optional:*** Sections VII - X

☐ **Expedited Exemption:** Site with no expected environmental impact
Required: Sections I - VI **and** Form 4400-226A Expedited Exemption Application ***Optional:*** Sections VII - X

I. Applicant Information

Owner - Last Name	First	MI	Phone Number (include area code)
ASHRE, LLC (sale pending)			

Contact Name (if different)
Tom Pientka

Street Address	City	State	ZIP Code
901 Deming Way	Madison	WI	53717

Developer - Last Name	First	MI	Phone Number (include area code)
Eagan	Patrick	L	(608) 664-3573

Street Address	City	State	ZIP Code
901 Deming Way	Madison	WI	53717

II. Site Name and Location

Site Name	Location / Address
Eagle Point Senior Living	935 E. John Street

Is the site known by another name(s)? ◉ Yes ○ No ○ Unknown
If yes, provide name: Former Farms USA (Former)

◉ City ○ Town ○ Village of Appleton

Does the site have a license number? ○ Yes ○ No ◉ Unknown
If yes, License Number: _____

State	ZIP Code	County
WI	54911	Outagamie

A. Attach a map with site location and limits of fill/waste disposal area.

B. Global Positioning System Coordinates

Latitude	DEG	MIN	SEC		Longitude	DEG	MIN	SEC	
	44	15	35.0000	N		88	23	30.0000	W

Describe method for collecting GPS Coordinates
Lat/Long Coordinates were obtained from BRRTS records so that location data was consistent. (02-45-530084)

Program Lead, Fee Status and Regulatory ID Numbers *(This area for DNR use only)*

○ **Waste Management Bureau**
○ **Remediation and Redevelopment Bureau - Exemption is part of remedy under NR 700 program**
  ○ Fee already paid for review of remedial design report.
  ○ Review of remedial design report not requested and payment is attached.

☐ Payment Attached
Amount $

Hazardous Waste Facility License ID #:(5 digits)	DNR FID #: (9 digits)	USEPA ID #:(used for both RCRA & CERCLIS #s) (WI+Alpha+9 digits)

Region	Project Manager	Telephone Number

III. Site Ownership History

Previous Owner - Last Name	First	MI	Telephone Number
Appleton Redevelopment Authority (sale pending)	c/o Karen Harkness		(920) 832-6468

Street Address	City	State	ZIP Code
100 North Appleton Street	Appleton	WI	54911

Responsible Municipal / Private Operator - Last Name (if applicable)	First	MI	Telephone Number

Street Address	City	State	ZIP Code

IV. Evaluation of Existing and Potential Impacts. See Development at Historic Fill Sites and Licensed Landfill: Guidance for Investigation and Development at Historic Fill Sites and Licensed Landfill: Potential Problems and Considerations.

A. Analytical data for the following media have been collected and/or examined before completing this application:

1. Groundwater: ◉ Yes ○ No
2. Soil: ◉ Yes ○ No
3. Surface water / sediment: ◉ Yes ○ No
4. Air: ○ Yes ○ No
5. Methane or other explosive gases: ○ Yes ○ No

B. Based on known or suspected sources and wastes, their physical characteristics, containment and geologic environment, do you suspect a release of pollutants to the environment?

◉ Yes: ☒ Groundwater ☒ Soil ☒ Surface Water / Sediment ☐ Methane or Other Explosive Gases
○ No

C. If there is NOT a likelihood of a release of pollutants or evidence of a release, would the impact of the proposed development be likely to cause a release to the environment?

○ Yes: **If yes, be sure to summarize actions to be taken to prevent adverse environmental impacts in V. Part C below.**
○ No

V. Summary of Existing and Potential Impacts. See Development at Historic Fill Sites and Licensed Landfill: Guidance for Investigation and Development at Historic Fill Sites and Licensed Landfill: Potential Problems and Considerations.

Describe the following in an attached narrative under the signature of a qualified professional. Organize, label and package as listed below.

A. Existing Site Conditions

1. existing site conditions including waste types,
2. potential for impacts, and
3. evaluation of existing impacts.

B. Proposed Development Summary. Include explanation for overall site decision.

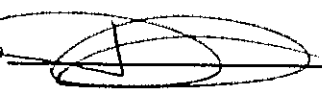
C. Summary of actions to be taken and engineering controls that will prevent or minimize adverse environmental impacts and potential threats to human health and welfare, including worker safety.

VI. Certification of Application Information

I certify that information in this application and all its attachments is true and correct and in conformity with applicable Wis. statutes.

Print / Type Name of Applicant

Tom Pientka

Applicant Signature  Date Signed 10/25/2016

Sections VII - IX are optional for all Applicants.

VII. Current and Historic Type of Waste Disposal Site (Check all that apply)

- ☐ Licensed Landfill
- ☐ Non-approved {See s.289.01(3)}, Wis Stats.
- ☐ Approved
- ☐ One-time Disposal
- ☒ Construction / Demolition
- ☒ Historic Fill Site

Liner
- ☒ Unlined
- ☐ Lined
- ☐ Composite Liner
- ☐ Other Liner (Describe):
- ☐ Clay Liner
- ☐ Unengineered

Total Landfill Volume
- ○ < 50,000 yd ³
- ◉ 50,000-500,000 yd
- ○ > 500,000 yd ³

Does the landfill have a closure plan? ○ Yes ○ No ○ Unknown

Does the landfill have a groundwater monitoring plan? ○ Yes ○ No ○ Unknown

Have groundwater monitoring wells been installed? ◉ Yes ○ No ○ Unknown

Was a cover installed? ◉ Yes: ○ No **If no, go to Past Land Uses.**

- ☐ Composite cap
- ☐ Layered soil cap with clay barrier
- ☒ Clay cap
- ☐ Soil cap - not recompacted clay
- ☐ Other cover
- ☐ Unknown

What is the thickness of the cover? ○ < 6 in ○ 6-12 in ○ 12-24 in ◉ > 24 in ○ Unknown

Past Land Uses. (Check all that apply)

- ☐ Agricultural co-op
- ☐ Brush pile
- ☐ Bulk plant
- ☐ Coal gas manufacturer
- ☐ Deer pit
- ☐ Dry cleaner
- ☐ Electroplater
- ☐ Lagoon
- ☐ Manufacturing Type:
- ☐ Old burn pit
- ☐ Pipeline
- ☐ RCRA generator
- ☐ Salvage yard
- ☐ Service Station
- ☒ Tannery
- ☐ Unknown
- ☒ Other: whey processing plant

Date(s) of Site Operation

From: 01/01/1950 To: 01/01/2003 No. of Years 53 ☐ Unknown

VIII. Waste Information & Geologic Environment. See Development at Historic Fill Sites and Licensed Landfills: Guidance for Investigation

A. Known or Suspected Sources/Wastes. (Check all that apply)

- ☐ Abandoned containers
- ☐ Above ground pipeline or tank
- ☐ Animal carcasses
- ☐ Buried drums
- ☐ Burning of materials
- ☒ Foundry sand
- ☐ Industrial accident
- ☐ Known or suspected hazardous materials
- ☐ Municipal waste
- ☐ Paper mill sludge
- ☐ Transformer
- ☐ Trees/brush
- ☐ Surface spills
- ☐ Fly ash
- ☒ Demolition/construction waste
- ☐ Surface impoundment/lagoons
- ☐ Underground pipeline or tank
- ☐ Exempted fill [NR 500.08(1) and (2)]
- ☐ Unknown
- ☒ Other: Off site fill, unknown sources

B. Physical Characteristics of Sources/Wastes

○ Liquid ◉ Solid ○ Liquid & Solid ○ Unknown

VIII. Waste Information & Geologic Environment *(continued)*

C. Waste Containment

◯ Liner ◯ Unknown ◯ Not applicable

☒ Engineered cover
◯ Maintained ◯ Not maintained

☐ Functioning leachate collection & removal system
☐ Functioning & maintained run-off management system
☐ Functioning groundwater monitoring system

D. Soil Type: Estimate distances or determinations based on regional or site specific information.

◯ Regional ◉ Site specific

Clay, silt or other fine grained soils present? (lacustrine, tills, etc.) ◉ Yes ◯ No

At surface? ◉ Yes ◯ No At depth? ◉ Yes ◯ No 6 feet

Sand & gravel, coarse grained soils present? ◉ Yes ◯ No

At surface? ◯ Yes ◉ No At depth? ◯ Yes ◯ No _____ feet

E. Depth to Groundwater

◯ Regional ◉ Site specific 5 feet

F. Direction of Groundwater Flow

◯ Regional ◉ Site specific East direction

G. Depth to Bedrock

◯ Regional ◉ Site specific 26 fcct direction

H. Bedrock Type

◉ Regional ◯ Site specific ☐ Sandstone ☒ Limestone/Dolomite ☐ Metamorphic/Igneous

IX. Site Visit

Conduct a site visit to complete site screening and determine general site conditions, on-site activities and adjacent land use encroachment issues. As appropriate to document the site, take photos, sketch the site and prepare a Site Visit Report.

On-site visit conducted? ◉ Yes ◯ No

General site conditions: Document any observed releases and note whether or not you were able to walk the site. Examples of things to be aware of include the following:

- leachate seeps or evidence of seeps such as stained soil/vegetation
- stressed vegetation as a sign of gas migration to the surface or of leachate seeps;
- quality and coverage of vegetation on the cap;
- odors which may indicate gas migration to the atmosphere;
- erosion of the cap;
- maintenance of positive drainage over the capped area;
- visual desiccation cracks in the cap.

Attach the following to your application:

☒ Photographs, regular or digital ☐ Site sketch ☐ Site Visit Report

Name(s) of Person(s) Conducting Site Visit	Date of Site Visit
Don Brittnacher	04/14/2016

IX. Site Visit *(continued)*

A. Adjacent Land Uses. Indicate all directions. (Check all that apply)

	N	S	E	W	NE	NW	SE	SW
☐ Agricultural	☐	☐	☐	☐	☐	☐	☐	☐
☐ Industrial	☐	☐	☐	☐	☐	☐	☐	☐
☐ Recreational	☐	☐	☐	☐	☐	☐	☐	☐
☒ Residential	☒	☐	☐	☒	☐	☒	☐	☐
☐ Undeveloped	☐	☐	☐	☐	☐	☐	☐	☐
☐ Commercial	☐	☐	☐	☐	☐	☐	☐	☐
☒ Other: Fox River	☐	☒	☒	☐	☒	☐	☒	☐

B. Potential Groundwater Receptors. Estimate distances. (1 mile = 5,280 ft)

Distance to and direction of nearest municipal well: _____ feet ☐ > ½ mile from the waste _____ direction

Distance to and direction of nearest other-than-municipal well: _____ feet ☐ > ½ mile from the waste _____ direction

Distance to and direction of nearest non-community well: _____ feet ☐ > ½ mile from the waste _____ direction

Distance to and direction of nearest private well: 2244 feet ☐ > ½ mile from the waste _____ direction

Distance to and direction of nearest private well: 2605 feet ☐ > ½ mile from the waste _____ direction

C. Potential For Gas Migration

45 No. of homes within 300 feet of waste (gas migration potential)

83 No. of homes between 300 & 1,000 ft to waste (gas migration potential)

Distance to and direction of nearest building: 26 feet ☐ > ½ mile from the waste _____ direction

Type of building: ☐ On-site building ☐ Municipal ☒ Residential ☐ Commercial ☐ Industrial ☐ Unknown

D. Potential Surface Water Receptors. Estimate distances.

◯ Creek _____ feet ◯ Drainage ditch: _____ feet ◯ Intermittent stream: _____ feet

◉ River 0 feet ◯ Lake _____ feet ◯ Wetland: _____ feet

E. Based on the site visit, did you visually observe…

1. a release to a surface water body? ◯ Yes ◉ No ◯ Unknown
2. a leachate seep? ◯ Yes ◉ No ◯ Unknown
3. a release to soils? ◯ Yes ◉ No ◯ Unknown

X. Comments: Use this section to provide comments on any aspect of the site visit. Attach any information or explanations labeled with the appropriate section number to which the material applies.

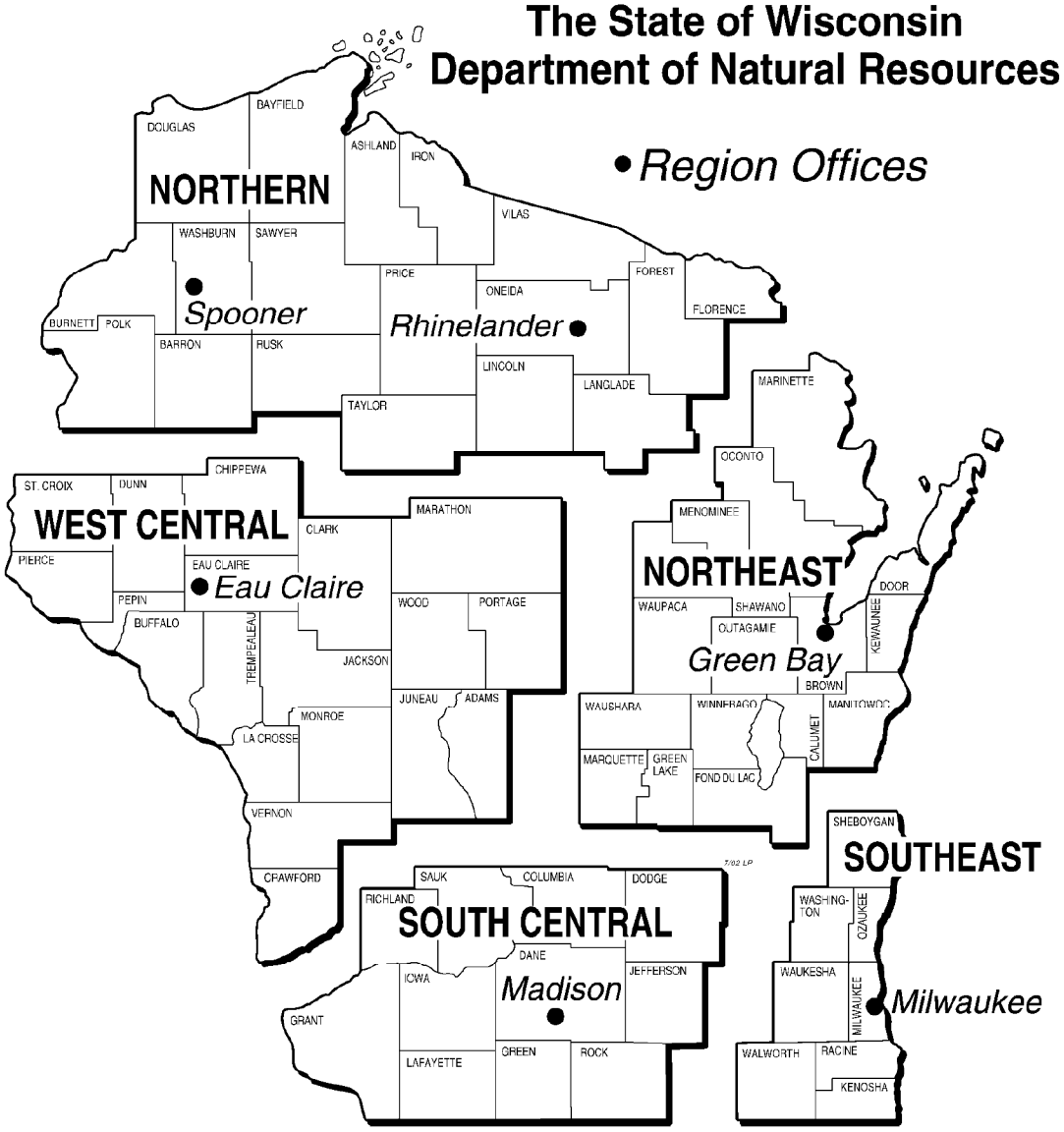
Region Map

NORTHERN REGION
Remediation & Redevelopment
Team Supervisor
Department of Natural Resources
107 Sutliff Avenue
Rhinelander, WI 54501
(715) 365-8976
OR
Regional Waste Program Manager
Department of Natural Resources
107 Sutliff Avenue
Rhinelander WI 54501
(715) 365-8946

NORTHEAST REGION
Remediation & Redevelopment
Team Supervisor
Department of Natural Resources
2984 Shawano Avenue
Green Bay, WI 54313-6727
(920) 662-5160
OR
Regional Waste Program Manager
Department of Natural Resources
2984 Shawano Avenue
Green Bay, WI 54313-6727
(920) 662-5120

SOUTHEAST REGION
Remediation & Redevelopment
Team Supervisor
Department of Natural Resources
2300 N. Martin Luther King Drive
Milwaukee, WI 53212
(414) 263-8561 or (414) 263-8714
OR
Regional Waste Program Manager
Department of Natural Resources
2300 N. Martin Luther King Drive
Milwaukee, WI 53212
(414) 263-8694 or (414) 263-8697

WEST CENTRAL REGION
Remediation & Redevelopment
Team Supervisor
Department of Natural Resources
1300 West Clairemont Avenue
Eau Claire, WI 54701
(715) 839-3710
OR
Regional Waste Program Manager
Department of Natural Resources
1300 West Clairemont Avenue
Eau Claire, WI 54701
(715) 839-3708



SOUTH CENTRAL REGION
Remediation & Redevelopment
Team Supervisor
Department of Natural Resources
3911 Fish Hatchery Road
Fitchburg, WI 53711
(608) 275-3241

OR Regional Waste Program Manager
Department of Natural Resources
3911 Fish Hatchery Road
Fitchburg, WI 53711
(608) 275-3466

State of Wisconsin
Department of Natural Resources
PO Box 7921, Madison WI 53707-7921
dnr.wi.gov

Development at Historic Fill Site or Licensed Landfill Expedited Exemption Application

Form 4400-226A (R 9/14)

Notice: This form and Form 4400-226 are required to apply for an expedited exemption to develop at a historic fill site or licensed landfill pursuant to ss. NR 506.085 and NR 500.08(4), Wis. Adm. Code. This form may only be used for landfill sites with no environmental impact. The Department will not consider your application unless you provide complete information requested. Personally identifiable information collected will be used to process your application and will also be accessible by request under Wisconsin's Open Records law [ss.19.31 - 19.39, Wis. Stats.]

Environmental Professional Evaluation

Professional Engineer or Geologist - Last Name	First	MI	Telephone Number (incl. area code)
Wayner	Brian	D	(920) 830-6141

Address	City	State	ZIP Code
One Systems Drive	Appleton	WI	54914-1654

I am a professional engineer or professional geologist or hydrologist registered to practice in Wisconsin and am qualified by training and experience to evaluate the potential for soil and groundwater contamination and the migration and concentration of explosive or toxic gases to occur from the disposal of solid waste.

I have evaluated the proposal described in this document for development on a property where solid waste has been disposed and it is my professional opinion that it is unlikely that "environmental pollution" exists or that there has been a significant "discharge" of a "hazardous substance" at the property (as these terms are defined in s. 292.01, Wis. Stats.). It is also my professional opinion that the development of the property as described in this document will not cause or exacerbate an exceedance of any applicable soil or groundwater standard and will not cause a significant increase in risk due to the migration or concentration of explosive or toxic gasses or cause any other significant risk to public health, safety or welfare or the environment.

My professional opinion is given to a reasonable degree of professional certainty, and is based upon my evaluation of reasonable and sufficient information and generally accepted engineering and scientific practices.

Signature	Date Signed	Wisconsin Registration Number
Brian D. Wayner	10/25/16	E-35304

WISCONSIN BRIAN D. WAYNER E-35304 PROFESSIONAL ENGINEER

Site Owner and Developer Certification

Property Owner - Last Name	First	MI	Telephone Number (incl. area code)
ASHRE, LLC - sale pending	Tom Pientka		(608) 664-3510

Address	City	State	ZIP Code
901 Deming Way, Suite 102	Madison	WI	53717

Developer - Last Name	First	MI	Telephone Number (incl. area code)
Iconica	Patrick Eagan		(608) 664-3573

Address	City	State	ZIP Code
901 Deming Way	Madison	WI	53717

I certify that I have read the DNR publication, *Development at Historic Fill Sites and Licensed Landfills: Considerations and Potential Problems* (PUB-RR-685, November 2013), and understand the potential environmental, health and safety risks if the development of the property is not compatible with the waste disposed at the site.

I also understand that future decisions regarding the use of the property must consider whether those changes will create an adverse environmental impact and that activities causing a significant threat to public health, safety, or welfare are prohibited under s. 289.46 (2), Wis. Stats. This exemption application and any exemption related to this document that is issued by the Department transfers to any future purchaser of this property.

Owner Signature _____ Date Signed 10/25/16

Developer Signature _____ Date Signed 10/25/16

Section V.

Summary of Existing and Potential Impacts

Table of Contents

Appendices

1.0 EXISTING SITE CONDITIONS

1.1 Existing Site Conditions Including Waste Types

Additional site information can be found in the *Soil and Waste Management Plan*, dated October 24, 2016.

A residential development (Eagle Point Senior Living) is being proposed by IconiCare, LLC, on an approximately eight-acre site located at 935 E. John Street in Appleton, Wisconsin. The Eagle Point Senior Living facility is a redevelopment of the former Foremost Farms Dairy site. On May 16, 2014, the Wisconsin Department of Natural Resources (DNR) issued a case closure letter for the former Foremost Farms Dairy property (BRRTS # 02-45-530084). Soil and groundwater contamination remained on-site at the time of closure. Closure conditions included complying with a *Cap Maintenance Plan and Material Handling Plan*, dated February 2014. A prior *Development at Historic Fill Site or Licensed Landfill Exemption Application*, dated April 9, 2012, was prepared by ARCADIS. The DNR provided a *Conditional Case-by-Case Grant of Exemption for the Development of a Property Where Solid Waste has been Disposed* response, dated April 25, 2012. (Reference Appendix 1 for copies of the 2012 *Development at Historic Fill Site or Licensed Landfill Exemption Application* and the DNR's response.)

The proposed Eagle Point Senior Living development would be constructed on the former Foremost Dairy property located in the SW ¼ of the SW ¼ of section 25, and the NW ¼ of the NW ¼ of section 36, T 21N, R17E, Appleton, Outagamie County, WI. (Reference Figure 1 – Location Map, Appendix 2.) The property is currently owned by the Appleton Redevelopment Authority (sale pending) and is zoned R3, Multifamily District.

The 8.1-acre property is bordered by the Fox River to the west and south, by a relatively steep slope along the west border with residential properties at the top of the slope, and generally wooded and shallower sloped residential property to the north. The College Avenue Bridge is also located north of the site. The west side of the Appleton lower dam intersects the shoreline near the east central portion of the site. It is our understanding that where the dam intersects the shoreline is property owned by another party. John Street dead-ends at the property's west border.

Various industries have operated at the site since the late 1800's. (Reference Figure 2 – Historical Orthophotos – 1938 to 2010, Appendix 2.) The early development of the site involved significant filling of the site and construction of raceways to direct water for energy production. Early site operations involved papermaking, tanning, machining, and quilting. Most recently, from the 1950's until 2003, the property was used as a whey processing facility by Foremost Farms. When the Foremost Farms facility ceased operations at the site the majority of the machinery was removed. The aboveground storage tanks at the site were removed in 2002 and 2004. The site was placed in the Wisconsin DNR's Voluntary Party Liability Exemption (VPLE) program in 2004 (BRRTS # 06-45-523605), and underwent soil and groundwater investigations.

The City of Appleton acquired the property on June 28, 2011, and began to demolish buildings later that year, completing the process in June 2012. A capping plan was carried out, in which direct contact with

contaminated soils at the site has been minimized by the placement of fill over contaminated areas. The DNR issued a Low Hazard Grant of Exemption for Beneficial Reuse of Contaminated Materials on October 27, 2011, to allow placement of 1,200 cubic yards of lead-bearing painted concrete at the eastern face of the western building basement wall. A Low Hazard Grant was also issued on June 26, 2012, to allow placement of 7,750 cubic yards of contaminated soils within the former building basement. In both cases, the materials were covered with five to eight feet of clay. These areas are located within the site's "development zone". The site achieved closure on May 16, 2014.

Past investigations and remedial activities have provided soil data across the site. Fill material throughout the entire site contains polycyclic aromatic hydrocarbons (PAHs), and select metals at concentrations that exceed direct contact criteria. Select volatile organic compounds (VOCs), PAHs, and metals exceed applicable groundwater pathway criteria; however, groundwater monitoring indicated no VOCs, PAHs, and metals present in groundwater at concentrations above regulatory standards. Sediment within the abandoned head raceway contained polychlorinated biphenyls (PCBs), PAHs, and metals. The total PCB concentrations in sediment were below the United States Environmental Protection Agency Toxic Substances Control Act rule. All soils and sediments beneath the established engineered barriers should be considered impacted.

Historical groundwater monitoring data at the site indicated exceedances of the ch. NR 140 Wis. Adm. Code, enforcement standard for sulfate at monitoring well MW1. The DNR granted an exemption to sulfate in the groundwater

Based on the geotechnical investigations coordinated by OMNNI in 2014 and 2016, the fill material on the site generally consists of various combinations of lean clay, silty sand, and gravel. The native soils on the subject property consist generally of glacial till consisting of lean clay with varying amounts of sand and gravel, as well as some apparently discontinuous organic deposits. The bedrock in the subsurface of the subject property is Ordivician dolomite of the Sinnipee group and is encountered at depths ranging from 14 to 35 fbgs.

The site is planned to be divided into three separate development lots. Lots 1 and 3 will be future development areas. Lot 2 is proposed to be used for the Eagle Point Senior Living campus. It is anticipated that excavation depths will range from approximately 6 to 10 feet across the planned senior housing development in Lot 2. The slab-on-grade area in the far southern portion of the south wing will require 2 to 6 feet of fill to bring the existing grades to plan slab on grade elevation.

On the western side of the senior living housing development, proposed grading plans are indicating existing site grades for parking. On the eastern side of the senior housing development, existing grades for parking, drive and lawn areas are higher than plan grades in the southern portion of the lot and near plan grades in the northern portion of the lot. Small cuts and fills are anticipated in the northern portion of lot 2 on the east side of the senior living housing development, and cuts are anticipated in the southern portion of the lot on the east side of the development.

New infrastructure including sewer, water, storm water, curb and gutter will also be required on the site. In addition to this infrastructure, a lift station is planned in the northwest corner of Lot 2 near boring B04-IC. (Reference Figure 3 – Site Detail Map, Appendix 2.)

1.2 Potential for Impacts

At this time the contamination from the historic fill detected does not appear to be impacting: species, habitat, or ecosystems sensitive to the contamination; wetlands; outstanding resource waters; or sites or facilities of historic or archaeological significance. However, laboratory analysis indicates that both the soil and groundwater have concentrations of contaminants.

1.3 Evaluation of Existing Impacts

Results from soil investigations conducted by ARCADIS indicated that a majority of the unsaturated fill material beneath the subject property contained PAHs and metals at concentrations exceeding direct contact criteria. (Reference Figure 3 – Site Detail Map, Appendix 2 and ARCADIS Table 3. Summary of Analytical Results for Soil Located Outside of the Development Area, Former FFUSA Site, Appendix 3.) The source of the PAHs is likely the historic deposition of fill from unknown sources to develop the subject property. Although select PAH, metals, and VOC concentrations in the soil exceeded their respective soil-to-groundwater pathway criteria, these constituents were not detected in groundwater above regulatory criteria. Sediment sampled from the head raceway area contained PAH, metal, and PCB concentrations that exceeded applicable direct contact criteria. The total PCB concentrations in sediment were below the United States Environmental Protection Agency Toxic Substances Control Act rule. All soils and sediments beneath the established engineered barriers should be considered impacted[1].

Groundwater monitoring results indicated that sulfate exceedances at the subject property were limited to one groundwater monitoring well (MW-1).

The DNR publication *Development At Historic Fill Sites And Licensed Landfills: Considerations And Potential Problems* (PUB-RR-685, April 2002) lists factors that should be considered when evaluating whether the planned land development is compatible with the waste conditions at the property. These factors and evaluations include:

- Methane gas accumulation in buildings and other enclosed structures
    - The lack of VOC concentrations and organic materials indicate that methane gas accumulation is unlikely.
- Toxic gases collection in buildings and other structures
    - VOC concentrations were not observed at levels that would pose a threat to indoor air quality. The developer was encouraged to install at least the underground infrastructure and make provisions for the equipment and venting for a radon type system.
- Disturbance of the soil cap

[1] Paraphrased from the *Cap Maintenance Plan and Materials Handling Plan*, dated February 2014.

  - A *Cap Maintenance Plan and Material Handling Plan*, dated February 2014, was prepared for the site. The *Soil and Waste Management Plan*, dated October 24, 2016, proposes how the materials will be handled during the redevelopment and proposes that the Cap Maintenance Plan and Material Handling Plan be amended to reflect the post-construction redevelopment.
- Utility lines acting as conduits for gas and leachate
  - The probability of the utility lines acting as a conduit for gas and leachate is unlikely due to the nature of the residual contamination, which is primarily PAHs. The site and surrounding area are serviced by the local municipal water supply system, which obtains drinking water from Lake Winnebago.
- Dewatering problems
  - If dewatering is necessary for the redevelopment, an application to the City of Appleton's Waste Water Treatment Plant will be submitted.
- Worker exposure
  - The developer is aware of the contamination present at the site and has been provided copies of the *Cap Maintenance Plan and Material Handling Plan* and the *Soil and Waste Management Plan* in addition to this document for his workers and subcontractors.
- Settlement problems
  - OMNNI conducted geotechnical surveys for the developer. The reports include recommendations for foundation design.
- Prohibition on water supply wells within 1200 feet of the waste limits
  - The property will be serviced by a municipal water supply. There are no known water supply wells within 1200 feet of the site.
- Material Handling
  - In addition to the existing *Cap Maintenance Plan and Material Handling Plan,* a *Soil* and *Waste Management Plan* was prepared for the redevelopment.

2.0 PROPOSED DEVELOPMENT SUMMARY

The proposed Eagle Point Senior Living facility will consist of 99 units, including 73 congregate independent units, 25 assisted living units, and one guest suite. Common areas will provide space for activities and socializing. Spaces will include a lobby with seating, library, game room, dining room and pub, two activity rooms, theater/chapel, beauty/barbershop, exercise pool, locker rooms, spa and exercise room. There will also be 70 underground parking stalls and individual storage lockers for use by the residents.

Preliminary Design of the Eagle Point Senior Living Facility Campus

West Side of Eagle Point Senior Living Facility (Entrance Side)

East Side of Eagle Point Senior Living Facility (River Side)

The site is planned to be divided into three (3) separate development lots. Lots 1 and 3 will be future development areas. Lot 2 is proposed to be used for the Eagle Point Senior Living campus. One main building is proposed in Lot 2 with a general north to south orientation and has a central rectangular shaped common area as well as a northern and southern wing orientated with a slight skew from the central common section of the building. The structure is proposed to have a basement and three stories with the exception that no basement will be constructed under the far southern portion of the southern wing. The far southern wing of the senior living building will consist of slab on grade construction with planned shallow foundations.

The basement areas will predominantly consist of underground parking in the central common section, the northern wing of the building, and the northern portion of the southern wing of the building. The basement area is also planned to include a pool area, fitness and spa room, and general maintenance space on the eastern portion of the central common section. The main floor will predominantly consist of living quarters as well as a lobby, kitchen, and dining areas in the central common section. The second and third floor will consist mainly of living quarters.

Parking areas are proposed along the west side of the senior living building on Lot 2 with drive areas located around the perimeter of the building.

There are approximately 45 residences within 300 feet of the site. There are approximately 83 residences between 300 feet and 1,000 feet of the site. The nearest known private well is 2,244 feet to the southwest of the site on the other side of the Fox River. The nearest building is 26 feet west of the site. (Reference Figure 4 – Historic Fill Exemption – Distances, Appendix 2.)

3.0 SUMMARY OF ACTIONS TO BE TAKEN

The site design of the Eagle Point Senior Living campus tried to work within the development areas. (Reference Figure 5 – Development Zones, Appendix 2.) The site design also factored in the contaminated materials on-site by raising the building and surrounding grade elevations. However, because of the grade changes across the site, there are still areas that are required to be cut and filled to allow the design to work. The final site design attempted to keep existing materials on-site and reduce the need for off-site materials.

Based on the proposed design, there would be an estimated 11,330 cubic yards of materials that would be cut for the development. The amount of cut materials includes clean fill that was brought to the site to create the development areas and materials beneath the clean fill and materials outside the development area, which are assumed to be contaminated. The volume of materials assumed to be contaminated is approximately 3,350 cubic yards. This volume will vary depending on the amount of clean fill that was brought in to cap the contaminated material. (Reference Figure 6 – Contaminated Soil Excavation, Appendix 2.) The main cut areas are for the building, a biofilter, and a stormwater pond. The biofilter and stormwater pond will have two-foot compacted clay liners. The notice of intent and Chapter 30 permits documentation has been submitted and approved.

The fill required for the development is estimated to be 10,000 cubic yards. The fill estimate includes volume that will be taken up by paved surfaces and topsoil. (Reference Figure 7 – Proposed Overall Fill Locations, Appendix 2.) The main fill areas are the parking area and around the building, including the southern part of the building, which will not have a lower level. (Reference Figure 8 – Proposed Cut/Fill Section Views, Appendix 2.)

Although the DNR agreed conceptually with the approach of placing a significant portion of the contaminated soil under the parking area, which is located above the former raceway, the U.S. Army Corps of Engineers requires that "fill material must consist of suitable material free from toxic pollutants in other than trace quantities". Nick Domer from the U.S. Army Corps of Engineers thought that "free from toxic pollutants in other than trace quantities" was interpreted to mean above laboratory detection limits. Therefore, the fill in the former raceway footprint will need to be from the clean cut material from the development areas.

The Phase II (Lot 1) development area has not been completely designed and can allow for more or less fill depending on the material actually encountered during construction. (Reference Figure 3 – Site Detail Map, Appendix 1 for future single family development (Phase II/Lot 1) area.) At this point approximately 2,700 cubic yards of fill is anticipated to be placed in the area of the future residential development. Every six-inch elevation change in the Phase II development area is approximately 620 cubic yards.

The northern part of the Eagle Point Senior Living building may encounter the fill material placed in the former building foundation. (Reference Figure 3 – Site Detail Map, Appendix 2 to compare proposed development to former building footprint.) If encountered, this material would be moved to an adjacent area requiring fill.

Areas that are disturbed and that are not covered by buildings or paved surface will have a soil cap of at least six-inches.

Because of the amount of cut and fill across the site, and because all soils and sediments beneath the established engineered barriers should be considered impacted, it is proposed that the existing Cap Maintenance Plan and Material Handling Plan be amended to reflect the new development.

Portions of the Eagle Point Senior Living building and supporting infrastructure may penetrate the geotextile barrier separating the clean fill from the contaminated material. Replacement of the geotextile barrier is not proposed, since the areas will be covered by structures, the clean fill relocation (other than over the former raceway) will not be tracked, and the entire site will be under a revised cap maintenance plan.

4.0 STANDARD OF CARE

The conclusions presented in the *Development at Historic Fill Site or Licensed Landfill Exemption Application* and the accompanying supplemental material were arrived at using generally accepted hydrogeologic and engineering practices. The conclusions presented herein represent our professional

opinions, based on data collected at the time of the investigation, at the specific boring and sampling locations discussed in this application. Conditions at other locations on the property may be different than described in this application. The scope of this application is limited to the specific project and location described herein.

5.0 SIGNATURE OF ENVIRONMENTAL PROFESSIONAL

"I, Brian D. Wayner, hereby certify that I am a registered professional engineer in the State of Wisconsin, registered in accordance with requirements of ch. A-E 4, Wis. Adm. Code; that this document has been prepared in accordance with the Rules of Professional Conduct in ch. A-E 8, Wis. Adm. Code; and that, to the best of my knowledge, all the information contained in this document is correct and the document was prepared in compliance with all applicable requirements in chs. NR 700 to 726, Wis. Adm. Code."

Prepared by: Brian D. Wayner , _____

Brian D. Wayner, P.E. (P.E. Stamp)

Previous Site Documentation

Development at Historic Fill Site or Licensed Landfill Exemption Application, dated April 9, 2012

Conditional Case-by-Case Grant of Exemption for the Development of a Property Where Solid Waste has been Disposed response, dated April 25, 2012.

ARCADIS
Infrastructure, environment, buildings

ARCADIS U.S., Inc.
126 North Jefferson Street
Suite 400
Milwaukee
Wisconsin 53202
Tel 414.276.7742
Fax 414.276.7603
www.arcadis-us.com

Ms. Jennifer Borski
Wisconsin Department of Natural Resources
625 E County Road, Suite 700
Oshkosh, WI 54901-9731

Subject:
Development at Historic Fill Site or Licensed Landfill Exemption Application, Former Foremost Farms Property, 935 E. John Street, Appleton, Wisconsin.
BRRT # 02-45-530084, VPLE # 06-45-523605

ENVIRONMENT

Date:
April 9, 2012

Contact.
Brian Maillet

Phone:
414.277.6229

Email:
brian.maillet@arcadis-us.com

Our ref.
WI001272.0001

Dear Ms. Borski:

This letter and attachments are the Development at Historic Fill Site or Licensed Landfill Exemption Application (Exemption Application) for the Former Foremost Farms Property located at 935 E. John Street in the city of Appleton, Wisconsin (Subject Site). The following bulleted list summarizes the material included with this Permit Application:

- Wisconsin Department of Natural Resources Form 4400-226
- Summary of Existing Site Conditions and Proposed Development
- Summary of Protective Actions

If you have any questions or comments, please contact me at your convenience.

Sincerely,

ARCADIS U.S., Inc.

Brian Maillet
Certified Project Manager/Senior Scientist

Attachments

State of Wisconsin
Department of Natural Resources

Development at Historic Fill Site or Licensed Landfill Exemption Application

Form 4400-226 (R 12/05)

Notice: Use of this form is required by the DNR for any application to develop at a historic fill site or licensed landfill pursuant to secs. NR 506.085 and NR 500.08(4), Wis. Adm. Code. The Department will not consider your application unless you provide complete information requested. Personally identifiable information collected will be used to process your application and will also be accessible by request under Wisconsin's Open Records law [ss.19.31 - 19.39, Wis. Stats.]

Instructions: See *Development at Historic Fill Sites and Licensed Landfills: What you need to know* (PUB-RR-683, April 2002) for detailed instructions.

- All Exemption Application materials should be sent to the region where the site is located, as listed on page 6.
- Include $500 fee payment with this application unless a fee was already paid for the review of the remedial design report under the NR 700 process.
- Determine the appropriate exemption type for the site and check appropriate box below.
- Provide complete information requested for each type of exemption. Include the following attachments:
  Required: Summary of Existing and Potential Impacts described in Section V as an attachment, under the seal of a professional engineer or geologist registered to practice in Wisconsin.
  Optional: Site Visit Summary Comments (Section IX) including any photos, sketches or site visit notes.

Exemption Type

☒ **Remediation and Redevelopment Program NR 700 Rule Series Process Exemption:** Site with remedial actions conducted in accordance with NR 700 series
Required: Sections I - VI ***Optional:*** Sections VII - X

☐ **Case-by-Case Evaluation:** Sites with anticipated environmental impacts or wastes of special concerns
Required: Sections I - VI ***Optional:*** Sections VII - X

☐ **Expedited Exemption:** Site with no expected environmental impact
Required: Sections I - VI and Form 4400-256A Expedited Exemption Application ***Optional:*** Sections VII - X

I. Applicant Information

Owner - Last Name	First	MI	Telephone Number
Appleton Redevelopment Authority			(920) 832-6468

Contact Name (if different): Karen Harkness

Street Address	City	State	ZIP Code
100 North Appleton Street	Appleton	WI	54911

Developer - Last Name	First	MI	Telephone Number

Street Address	City	State	ZIP Code

II. Site Name and Location

Site Name: Former Foremost Farms Property

Location / Address: 935 E. John Street

Is the site known by another name(s)? ☐ Yes ☒ No ☐ Unknown

☒ City ☐ Town ☐ Village of Appleton

If yes, provide name.

ZIP Code: 54911 State: WI

Does the site have a license number? ☐ Yes ☒ No ☐ Unknown If yes, License Number:

County: Outagamie

A. Attach a map with site location and limits of fill/waste disposal area.

B. Global Positioning System Coordinates

Latitude: DEG 44 MIN 15 SEC 31 N

Longitude: DEG 88 MIN 23 SEC 30 W

Describe method for collecting GPS Coordinates: WDNR GIS Registry

Program Lead, Fee Status and Regulatory ID Numbers *(This area for DNR use only)*

☐ **Waste Management Bureau**

☐ **Remediation and Redevelopment Bureau - Exemption is part of remedy under NR 700 program**
- ☐ Fee already paid for review of remedial design report
- ☐ Review of remedial design report not requested and payment is attached

☐ Payment Attached

Amount: $

Hazardous Waste Facility License ID No (5 digits)	DNR FID No (9 digits)	USEPA ID No (used for both RCRA and CERCLIS #s) (WI+Alpha+9 digits)

Region	Project Manager	Telephone Number

III. Site Ownership History

Previous Owner - Last Name	First	MI	Telephone Number
Foremost Farms USA			1-800-362-9196

Street Address	City	State	ZIP Code
PO Box 111	Baraboo	WI	53913

Responsible Municipal / Private Operator - Last Name (if applicable)	First	MI	Telephone Number

Street Address	City	State	ZIP Code

IV. Evaluation of Existing and Potential Impacts. **See Development at Historic Fill Sites and Licensed Landfill: Guidance for Investigation and Development at Historic Fill Sites and Licensed Landfill: Potential Problems and Considerations.**

A. Analytical data for the following media have been collected and/or examined before completing this application:

1. Groundwater:	☒ Yes	☐ No
2. Soil:	☒ Yes	☐ No
3. Surface water / sediment:	☒ Yes	☐ No
4. Air:	☐ Yes	☒ No
5. Methane or other explosive gases:	☐ Yes	☒ No

B. Based on known or suspected sources and wastes, their physical characteristics, containment and geologic environment, do you suspect a release of pollutants to the environment?

☐ Yes: ☐ Groundwater ☐ Soil ☐ Surface Water / Sediment ☐ Methane or Other Explosive Gases
☒ No

If yes, an expedited exemption is not appropriate unless further investigation shows that a release of pollutants is not likely.

C. If there is NOT a likelihood of a release of pollutants or evidence of a release, would the impact of the proposed development be likely to cause a release to the environment?

☐ Yes **If yes, be sure to summarize actions to be taken to prevent adverse environmental impacts in V. Part C below.**
☒ No

V. Summary of Existing and Potential Impacts. **See Development at Historic Fill Sites and Licensed Landfill: Guidance for Investigation and Development at Historic Fill Sites and Licensed Landfill: Potential Problems and Considerations.**

Describe the following in an attached narrative under the signature of a qualified professional. Organize, label and package as listed below.

A. Existing Site Conditions
   1. existing site conditions including waste types,
   2. potential for impacts, and
   3. evaluation of existing impacts.

B. Proposed Development Summary. Include explanation for overall site decision.

C. Summary of actions to be taken and engineering controls that will prevent or minimize adverse environmental impacts and potential threats to human health and welfare, including worker safety.

VI. Certification of Application Information

I certify that information in this application and all its attachments is true and correct and in conformity with applicable Wis. statutes.

Print / Type Name of Applicant
Karen E. Harkness Director of Community & Economic Development

Applicant Signature	Date Signed
Karen E. Harkness	4-9-2012

Sections VII - IX are optional for all Applicants.

VII. Current and Historic Type of Waste Disposal Site (Check all that apply)

- ☐ Licensed Landfill
- ☐ Non-approved {See s.289.01(3)}, Wis Stats.
- ☐ Approved
- ☐ One-time Disposal
- ☐ Construction / Demolition
- ☒ Historic Fill Site

Liner

- ☒ Unlined
- ☐ Lined
- ☐ Composite Liner
- ☐ Other Liner (Describe): _____
- ☐ Clay Liner
- ☐ Unengineered

Total Landfill Volume

- ☐ < 50,000 yd^3
- ☒ 50,000-500,000 yd
- ☐ > 500,000 yd^3

Does the landfill have a closure plan? ☒ Yes ☐ No ☐ Unknown
Does the landfill have a groundwater monitoring plan? ☒ Yes ☐ No ☐ Unknown
Have groundwater monitoring wells been installed? ☒ Yes ☐ No ☐ Unknown

Was a cover installed? ☐ Yes ☒ No **If no, go to Past Land Uses.**

- ☐ Composite cap
- ☐ Layered soil cap with clay barrier
- ☐ Clay cap
- ☐ Soil cap - not recompacted clay
- ☐ Other cover
- ☐ Unknown

What is the thickness of the cover? ☐ <6 in ☐ 6-12 in ☐ 12-24 in ☐ >24 in ☐ Unknown

Past Land Uses. (Check all that apply)

- ☐ Agricultural co-op
- ☐ Brush pile
- ☐ Bulk plant
- ☐ Coal gas manufacturer
- ☐ Deer pit
- ☐ Dry cleaner
- ☐ Electroplater
- ☐ Lagoon
- ☐ Manufacturing Type: _____
- ☐ Old burn pit
- ☐ Pipeline
- ☐ RCRA generator
- ☐ Salvage yard
- ☐ Service Station
- ☒ Tannery
- ☐ Unknown
- ☒ Other: Whey Processing Plant

Date(s) of Site Operation
From: 1950 To: 2003

No. of Years: 53 ☐ Unknown

VIII. Waste Information & Geologic Environment. **See Development at Historic Fill Sites and Licensed Landfills: Guidance for Investigation**

A. Known or Suspected Sources/Wastes. (Check all that apply)

- ☐ Abandoned containers
- ☐ Above ground pipeline or tank
- ☐ Animal carcasses
- ☐ Buried drums
- ☐ Burning of materials
- ☒ Foundry sand
- ☐ Industrial accident
- ☐ Known or suspected hazardous materials
- ☐ Municipal waste
- ☐ Paper mill sludge
- ☐ Transformer
- ☐ Trees/brush
- ☐ Surface spills
- ☐ Fly ash
- ☐ Demolition/construction waste
- ☐ Surface impoundment/lagoons
- ☐ Underground pipeline or tank
- ☐ Exempted fill {NR 500.08(1) and (2)}
- ☐ Unknown
- ☒ Other: off-site fill material from unknown sources

B. Physical Characteristics of Sources/Wastes

☐ Liquid ☒ Solid ☐ Liquid & Solid ☐ Unknown

VIII. Waste Information & Geologic Environment *(continued)*

C. Waste Containment

☐ Liner ☐ Unknown ☒ Not applicable

☐ Engineered cover
☐ Maintained ☐ Not maintained

☐ Functioning leachate collection & removal system
☐ Functioning & maintained run-off management system
☐ Functioning groundwater monitoring system

D. Soil Type: Estimate distances or determinations based on regional or site specific information.

☐ Regional ☒ Site specific

Clay, silt or other fine grained soils present? (lacustrine, tills, etc.) ☐ Yes ☐ No

At surface? ☐ Yes ☐ No At depth? ☐ Yes ☐ No _____ feet

Sand & gravel, coarse grained soils present? ☒ Yes ☐ No

At surface? ☒ Yes ☐ No At depth? ☒ Yes ☐ No 26 feet

E. Depth to Groundwater

☒ Regional ☒ Site specific 5 to 16 feet

F. Direction of Groundwater Flow

☒ Regional ☐ Site specific East direction

G. Depth to Bedrock

☐ Regional ☒ Site specific 26 direction

H. Bedrock Type

☐ Regional ☐ Site specific ☐ Sandstone ☒ Limestone/Dolomite ☐ Metamorphic/Igneous

IX. Site Visit

Conduct a site visit to complete site screening and determine general site conditions, on-site activities and adjacent land use encroachment issues. As appropriate to document the site, take photos, sketch the site and prepare a Site Visit Report.

On-site visit conducted? ☒ Yes ☐ No

General site conditions: Document any observed releases and note whether or not you were able to walk the site. Examples of things to be aware of include the following:

- leachate seeps or evidence of seeps such as stained soil/vegetation
- stressed vegetation as a sign of gas migration to the surface or of leachate seeps;
- quality and coverage of vegetation on the cap;
- odors which may indicate gas migration to the atmosphere;
- erosion of the cap;
- maintenance of positive drainage over the capped area;
- visual desiccation cracks in the cap.

Attach the following to your application:

☒ Photographs, regular or digital ☒ Site sketch ☐ Sit Visit Report

Name(s) of Person(s) Conducting Site Visit	Date of Site Visit
Brian Maillet	March 27, 2012

IX. Site Visit *(continued)*

A. Adjacent Land Uses. Indicate all directions. (Check all that apply)

	N	S	E	W	NE	NW	SE	SW
☐ Agricultural	☐	☐	☐	☐	☐	☐	☐	☐
☐ Industrial	☐	☐	☐	☐	☐	☐	☐	☐
☐ Recreational	☐	☐	☐	☐	☐	☐	☐	☐
☒ Residential	☒	☐	☐	☒	☐	☒	☐	☒
☐ Undeveloped	☐	☐	☐	☐	☐	☐	☐	☐
☐ Commercial	☐	☐	☐	☐	☐	☐	☐	☐
☒ Other: Fox River	☐	☒	☒	☐	☒	☐	☒	☐

B. Potential Groundwater Receptors. Estimate distances. (1 mile = 5,280 ft)

Distance to and direction of nearest municipal well: _____ feet ☒ > ½ mile from the waste North direction

Distance to and direction of nearest other-than-municipal well: _____ feet ☐ > ½ mile from the waste _____ direction

Distance to and direction of nearest non-community well: _____ feet ☐ > ½ mile from the waste _____ direction

Distance to and direction of nearest private well: _____ feet ☒ > ½ mile from the waste North direction

Distance to and direction of nearest residence: Adjacent feet ☐ > ½ mile from the waste _____ direction

C. Potential For Gas Migration

8 No. of homes within 300 feet of waste (gas migration potential)

17 No. of homes between 300 & 1,000 ft to waste (gas migration potential)

Distance to and direction of nearest building: Adjacent feet ☐ > ½ mile from the waste _____ direction

Type of building: ☐ On-site building ☐ Municipal ☒ Residential ☐ Commercial ☐ Industrial ☐ Unknown

D. Potential Surface Water Receptors. Estimate distances.

☐ Creek: _____ feet ☐ Drainage ditch: _____ feet ☐ Intermittent stream _____ feet

☒ River: Adjacent feet ☐ Lake: _____ feet ☐ Wetland: _____ feet

E. Based on the site visit, did you visually observe...

1. a release to a surface water body?	☐ Yes	☒ No	☐ Unknown
2. a leachate seep?	☐ Yes	☒ No	☐ Unknown
3. a release to soils?	☐ Yes	☒ No	☐ Unknown

X. Comments: Use this section to provide comments on any aspect of the site visit. Attach any information or explanations labeled with the appropriate section number to which the material applies.

Region Map

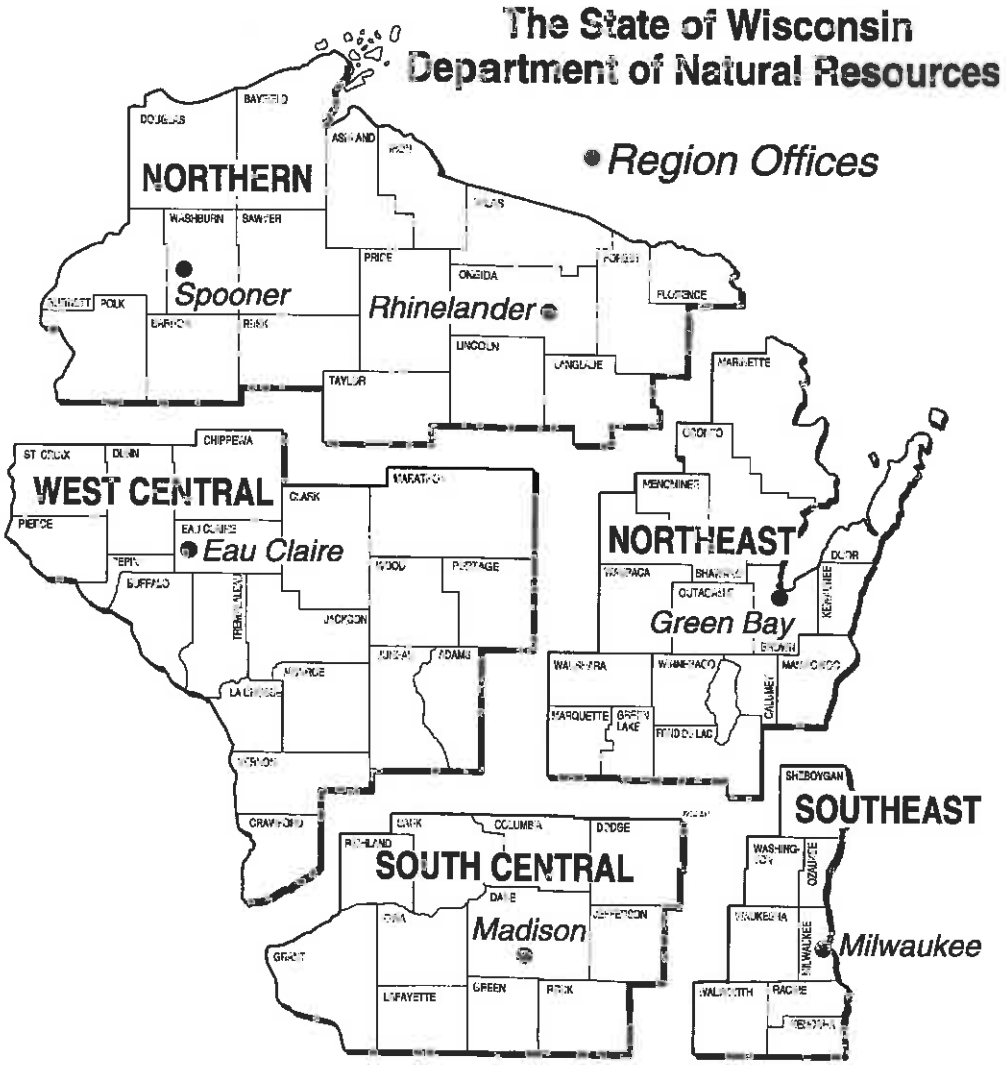
NORTHERN REGION
Remediation & Redevelopment
Team Supervisor
Department of Natural Resources
107 Sutliff Avenue
Rhinelander, WI 54501
(715) 365-8976
OR
Regional Waste Program Manager
Department of Natural Resources
107 Sutliff Avenue
Rhinelander WI 54501
(715) 365-8946

NORTHEAST REGION
Remediation & Redevelopment
Team Supervisor
Department of Natural Resources
2984 Shawano Avenue
Green Bay, WI 54307-0448
(920) 662-5160
OR
Regional Waste Program Manager
Department of Natural Resources
2984 Shawano Avenue
Green Bay, WI 54307-0448
(920) 662-5120

SOUTHEAST REGION
Remediation & Redevelopment
Team Supervisor
Department of Natural Resources
P.O. Box 12436
Milwaukee, WI 53212-0436
(414) 263-8561 or (414) 263-8714
OR
Regional Waste Program Manager
Department of Natural Resources
P.O. Box 12436
Milwaukee WI 53212-0436
(414) 263-8694 or (414) 263-8697

WEST CENTRAL REGION
Remediation & Redevelopment
Team Supervisor
Department of Natural Resources
1300 Clairemont Avenue
Eau Claire, WI 54701
(715) 839-3710
OR
Regional Waste Program Manager
Department of Natural Resources
1300 Clairemont Avenue
Eau Claire WI 54701
(715) 839-3708

SOUTH CENTRAL REGION
Remediation & Redevelopment
Team Supervisor
Department of Natural Resources
3911 Fish Hatchery Rd.
Fitchburg, WI 53711
(608) 275-3241
OR
Regional Waste Program Manager
Department of Natural Resources
3911 Fish Hatchery Road
Fitchburg WI 53711
(608) 275-3466



ARCADIS

Summary of Site Conditions and Proposed Development

The former Foremost Farms, USA property is located at 935 East John Street, Appleton, Wisconsin (the "Subject Site"). The Subject Site is currently owned by the Appleton Redevelopment Authority (Appleton). Appleton is currently in the process of demolishing building structures and abandoning select canals (hereafter referred to as raceways) on the Subject Site. These activities are part of a redevelopment project that will result in the completion of a 6.16-acre grass capped area within the 8.22 acre Subject Site that will be ready for future residential development.

Soil investigation results indicated that a majority of the unsaturated fill material beneath the Subject Site contained polycyclic aromatic hydrocarbons (PAHs) and metal constituent concentrations exceeding direct contact criteria. The source of the PAHs is likely the historic deposition of fill from unknown sources to develop the Subject Site. Groundwater monitoring results indicated sulfate exceedances at the Subject Site were limited to one groundwater monitoring well at the Subject Site (Monitoring Well MW-1). Although select volatile organic compound, metal, and PAH concentrations in soils exceeded their respective soil to groundwater pathway criteria, these constituents have not been detected in groundwater above regulatory criteria for the past six groundwater sampling events. Sediment samples collected from the 31,400 square foot (0.72 acre) head raceway area that is being abandoned in accordance with a Chapter 30 permit contained PAH, metal, and polychlorinated biphenyl (PCB) concentrations that exceed applicable direct contact criteria. The total PCB concentrations in sediment were below the United States Environmental Protection Agency Toxic Substances Control Act rule.

On March 21, 2012, Appleton developed an Analysis of Brownfield Cleanup Alternatives (ABCA) for the Subject Site. Alternative one was to leave the Subject Site in current condition, while Alternative two was to demolish the building structures on the Subject Site with mitigation of impacted soils with engineered barriers. Based on a review of potential remedial action options, a Remedial Action Plan (RAP) was developed under Alternative two and was approved by the Wisconsin Department of Natural Resources (WDNR) on March 28, 2012. The RAP consisted of the following elements:

- Relocation of soils exceeding ch. NR 720 direct contact pathway exceedances within the Subject Site boundaries to achieve a 4- to 7-foot clean soil cap within an

established residential development zone. A minimum 6-inch clean soil cap will be placed over the remaining affected soil.

- Reuse of concrete building aggregate coated with lead bearing paint as fill material.

- Completion of a vegetative cap across the Subject Site.

- Use of natural attenuation to address the limited extent of sulfate-affected groundwater, identified at one monitoring well (MW-1).

The demolition phase of the Subject Site started in November 2011. Between January 2009 and December 2011, ARCADIS completed a pre-demolition assessment and obtained a beneficial reuse exemption and a Chapter 30 permit from the WDNR for the Subject Site. The ARCADIS pre-demolition assessment recommendations and WDNR requirements are being followed and will be documented in a post-demolition report that will be submitted to the WDNR as part of closure-related activities.

During the demolition of the former FFUSA building structures, impacted soils will be relocated on-site and fill material will be imported to the Site from a WDNR-approved clean soil source area. The relocation and importation of soils will result in an approximate 103,350 square foot (2.37 acres) development zone within the Site. The engineered barrier for the development zone will consist of a 4 to 7 foot (ft) thick clean soil cap. Approximately 0.95 acre of this development zone located south of the building footprint will have a 4-ft thick clean soil cap. The remaining 1.42 acre of the development zone within the building footprint will have a 7-ft thick clean soil cap. The approximate 0.72 acre former head raceway area will have a cap thickness ranging from 3 to 8 ft to match a post-demolition preliminary grade. Approximately 3.07 acres of the Subject Site will be capped with a minimum 6-inch clean soil cap. The remaining 1.89 acres include the woodland embankments and wooded breakwater that will not be capped in order to preserve the natural setting of these areas. The existing 0.17 acre parking lot will also not be capped with soil.

Concrete building aggregate will be used as fill material in the former head raceway. The aggregate in these two areas will be covered with a geotextile and capped with at least 1 foot of clean soil material. Based on the post-demolition preliminary grade, the depth to this aggregate will likely be 3 to 6 feet below the preliminary grade. Lead based paint aggregate will be placed along the eastern face of the western building wall, which will be completed with the 7-foot clean soil cap. Grass seed will be applied

to the surface of the established soil grades to complete a vegetative soil cap across the Subject Site.

Due to the residual soil contamination, precautions will need to be taken during future Site work that requires penetrating the engineered barriers and disturbing underlying soil to ensure the protection of human health and the environment. A Cap Maintenance Plan and Materials Handling Plan (the Plan) was developed for the Subject Site to detail the approved engineered barriers which may consist of a minimum of 6 inches of clean soil (e.g., backfill, topsoil, and seed for landscaping), future buildings, and future concrete or asphalt pavement over the soils that exceed the direct contact residual contaminant levels. The Plan was submitted to the WDNR along with the RAP on March 22, 2012.

The procedures and controls that shall be followed to maintain the function of the engineered barriers is described in the Cap Maintenance Plan. Maintaining the function of the engineered barriers will provide continued protection of human health and the environment by minimizing potential exposure to the residual contamination. The activities required for maintaining the engineered barriers are: annual cap inspections, repairs of engineered barriers, and replacement of engineered barriers.

The Material Handling Plan specifies the requirements to be followed when performing earth work, groundwater, or surface water management at the Subject Site. These activities will be generally associated with future construction/redevelopment of the Subject Site. The activities required under the material handling plan are: contractor notification, soil management, soil characterization, and reporting (if applicable).

Summary of Protective Actions

The following sections present a summary of the protective actions for the Former Foremost Farms Property located in Appleton, Wisconsin.

The Wisconsin Department of Natural Resources (WDNR) publication *Development at Historic Fill Sites and Licensed Landfills: Considerations and Potential Problems* (PUB-RR-685, WDNR April 2002) lists factors that must be considered when evaluating whether the planned land development is compatible with the waste conditions at a property. These factors include:

- Methane Gas Accumulation in Buildings and Enclosed Structures
- Toxic Gases Collection in Buildings and Other Structures
- Disturbance of the Soil Cap
- Utility Lines Acting as Conduits for Gas and Leachate and Water Supply Wells
- Dewatering Problems
- Worker Exposure
- Settlement Problems
- Prohibition on Water Supply Wells within 1,200 Feet of Waste Limits
- Material Handling

Each factor is addressed in the sections that follow.

Methane Gas Accumulation in Buildings and Enclosed Structures

The Subject Site setting and lack of contaminant (e.g., VOCs) concentrations indicate that methane gas accumulation is unlikely.

Toxic Gases Collection in Buildings and Other Structures

There are no contaminants (e.g., VOCs) at concentrations that would pose a threat to indoor air quality.

Disturbance of the Soil Cap

As part of pursuing Site closure under NR726 Wisconsin Administrative Code, a Cap Maintenance Plan and Material Handling Plan was prepared for the Subject Site. The Cap Maintenance Plan and Material Handling Plan is designed to specify future measures to implement to address residual soil and groundwater contamination at the Subject Site.

Utility Lines Acting as Conduits for Gas and Leachate and Water Supply Wells

Future utility lines will be installed using the guidance outlined in the Material Handling Plan. Following installation of utility lines in accordance with the Plan, the probability of the utility lines acting as a conduit for gas and leachate is highly unlikely due to the nature of the residual soil contaminants (e.g., PAHs).

The Site and surrounding area is serviced by the local municipal water supply system, which obtains drinking water from Lake Winnebago. Based on a private potable water well search of the WDNR well database, there are at least three private potable wells between 0.5-mile and 1-mile of the Subject Site (see attached spreadsheet). The extent of sulfate-impacted groundwater at the Subject Site is limited to one well and it is delineated. Development of the Subject Site with the proposed cap elements will not expand the extent of sulfate-impacted groundwater at the Subject Site.

Dewatering Problems

Dewatering problems are not considered an issue with the current redevelopment scenario for the Subject Site.

Worker Exposure

Construction workers engaged in the redevelopment may come into contact with the residual fill material. These materials may be encountered during activities such as site grading, utility placement, or construction of footings/foundations.

Prior to redevelopment of the property, construction documents will be prepared for the general contractor and selected subcontractors. These documents will contain information pertaining to the nature and distribution of the residual fill material at the Subject Site. The general contractor and subcontractors who may potentially encounter the residual fill material will be required to inform workers of the fill material and to provide instructions on procedures to follow when the fill material is encountered.

Settlement Problems

Geotechnical surveys have been conducted at the Subject Site. A preliminary site grading plan and other surface water drainage features have been completed for the Subject Site. Settlement problems in areas of fill will be addressed through active participation between the city of Appleton and the future developer.

Prohibition on Water Supply Wells within 1,200 Feet of Waste Limits

The Subject Site is serviced by the local municipal water supply system. There are no water supply wells within 1,200 feet of the Subject Site.

Material Handling

Fill materials may be disturbed during construction activities, including site grading, utility placement, and footing/foundation construction. A Cap Maintenance Plan and Material Handling Plan was prepared as an institutional control to satisfy the ch. NR 726 Site Closure requirements.

WI Unique Well #	County Name	Data Owner	Municipality	Well Use	Construction Date	Well Bottom (ft.)	Static Water Level (ft.)	Casing Bottom (ft.)	Casing Diameter (in.)	Well Status	Address
FP798	Outagamie	WS	APPLETON	Private Potable	1/20/1993	142	60	72	6	ACTIVE	1219 Grandview, Appleton, WI
GI138	Outagamie	WS	APPLETON	Private Potable	5/21/1993	242	80	60	6	ACTIVE	2626 N. Onieda St., Appleton, WI
KY590	Outagamie	WS	APPLETON	Private Potable	4/28/1997	617	105	244.5	12	ACTIVE	825 E. Wisconsin Ave., Appleton, WI

State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
Oshkosh Service Center
625 East County Road Y, STE 700
Oshkosh, WI 54901-9731

Scott Walker, Governor
Cathy Stepp, Secretary

State Customer Service # 888-936-7463
Oshkosh FAX# 920-424-4404

April 25, 2012

Karen Harkness
City of Appleton
Appleton Redevelopment Authority
100 N. Appleton St.
Appleton, WI 54911

Outagamie County
FID # 445031510
WDNR ERP #: 02-45-530084
WDNR VPLE #: 06-45-523605

Subject: Conditional Case-by-Case Grant of Exemption for the Development of a Property Where Solid Waste has been Disposed: Parcel #s: 311077200, 311073500, **Foremost Farms (Former) Redevelopment**, 935 E. John St., Appleton, Outagamie Co., WI

Dear Ms. Harkness:

We have reviewed your request dated April 9, 2012 for a grant of exemption from regulation under s. NR 506.085, Wis. Adm. Code. Based on that evaluation, the Department is issuing this general grant of exemption from the prohibitions contained in s. NR 506.085, Wis. Adm. Code. You must comply with the conditions of this grant of exemption in order to maintain the exemption. This grant of exemption is limited to the proposed changes described in your application. If you are considering additional changes beyond those described in the application, a new application must be submitted to the department for approval.

Please review the information contained in the publication *Development at Historic Fill Sites and Licensed Landfills: Considerations and Potential Problems,* PUB-RR-685, to assist you in preventing environmental or safety problems during and after development. We would like to particularly draw your attention to the public safety risk posed by the explosive potential for methane gas that may be present on a property due to the presence of decomposing solid waste.

You are reminded that this approval does not relieve you of obligations to meet all other applicable federal, state and local permits, as well as zoning and regulatory requirements. If you have any questions concerning this letter, please contact Jennifer Borski in Oshkosh at (920) 424-7887 or by email to jennifer.borski@wisconsin.gov.

Sincerely,

Roxanne N. Chronert, Team Supervisor
Northeast Region Remediation & Redevelopment Program

c: J. Borski – DNR, Oshkosh
File copy - A. Coakley, WA/5, Madison and D. Hammel, WA, Green Bay
Bruce Roskom, Community Development, 100 N. Appleton St., Appleton, WI 54911-4799

Attachment: Aerial photo and parcel boundary map

BEFORE THE
STATE OF WISCONSIN
DEPARTMENT OF NATURAL RESOURCES

CONDITIONAL GRANT OF EXEMPTION
FOR
DEVELOPMENT ON A PROPERTY
WHERE SOLID WASTE HAS BEEN DISPOSED

FINDINGS OF FACT

The Department finds that:

1. The Appleton Redevelopment Authority ("ARA") owns the property located at 935 East John Street, Appleton, Outagamie County, Wisconsin ("the Property").

2. Solid waste has been disposed of at the Property and remains at the Property.

3. Karen Harkness, Director of Community & Economic Development for the City of Appleton, has submitted a request dated April 9, 2012 for an exemption from the prohibition in NR 506.085, Wis. Adm. Code. The request has been submitted under the seal of a professional engineer or a professional geologist relating to the proposed development and the environmental conditions at the property.

4. Based upon the information provided to the Department, the proposed development at the Property is not expected to cause future exceedances of applicable soil and groundwater standards.

5. Additional documents considered in review of the exemption request include the following:
   - The boundaries of the Property are shown on the **aerial photo and parcel boundary map**, which is attached and made part of this exemption.
   - *Remedial Action Plan, Former Foremost Farms Property, Appleton, Wisconsin, FID No. 445031510, VPLE No. 06-45-523605*, dated March 2012 and prepared by Arcadis;
   - *Cap Maintenance Plan and Materials Handling Plan, Former Foremost Farms Property, Appleton, Wisconsin, FID No. 445031510, VPLE No. 06-45-523605*, dated March 2012 and prepared by Arcadis;
   - *Response to* Remedial Action Plan *and* Cap Maintenance Plan and Materials Handling Plan *for Foremost Farms (Former), 935 E. John St., Appleton, WI, WDNR BRRTS # 02-45-530084 / 06-45-523605*, dated March 28, 2012 and issued to Ms. Karen Harkness, Appleton Redevelopment Authority, 100 N. Appleton St., Appleton, WI 54911.
   - April 24, 2012, 3:27 PM, electronic mail from Brian Maillet (Arcadis) to Jennifer Borski (Department) and copied to Karen Harkness (City of Appleton), Quasan Shaw (City of Appleton), Mark Hurban, Ryan Bombeck, Dennnis Wesselhoft and M. Carlson (Sabre Demolition) and titled *FFUSA*, *Revised Cap thickness* that includes the attachment, Figure 6.pdf, an amended soil management plan for the development area (proposed cap thickness reduced from seven feet to five feet of clean fill).

- April 25, 2012, 2:14 PM, electronic mail from Jennifer Borski (Department) to Brian Maillet (Arcadis) and titled *RE: FFUSA*, *Revised Cap thickness* that includes a response to the proposal to reduce cap thickness from seven feet to five feet of clean fill.

6. Additional facts relevant to the review of the grant of exemption modification request include the following:
    - The application is specific to the Property currently addressed as 935 E. John St., Appleton, Wisconsin and includes parcel numbers 311077200 and 311073500.

7. If the conditions set forth below are complied with, the development of the Property will not result in environmental pollution as defined in ss. 289.01(8) and 299.01(4), Wis. Stats.

CONCLUSIONS OF LAW

1. The Department has the authority under s. NR 500.08(4), Wis. Adm. Code to issue an exemption from the prohibition in s. NR 506.085, Wis. Adm. Code, if the proposed development will not cause environmental pollution as defined in ss. 289.01(8) and 299.01(4), Wis. Stats.

2. The Department has authority to approve a grant of exemption with conditions if the conditions are necessary to ensure compliance with the applicable provisions of chapters NR 500 to 538, Wis. Adm. Code, or to assure that environmental pollution will not occur.

3. The conditions set forth below are necessary to ensure compliance with the applicable provisions of chapters NR 500 to 538, Wis. Adm. Code, and to assure that environmental pollution will not occur.

4. In accordance with the foregoing, the Department has the authority under s. NR 500.08(4), Wis. Adm. Code, to issue the following conditional grant of exemption.

CONDITIONAL GRANT OF EXEMPTION

The Department hereby issues an exemption to from the prohibition in s. NR 506.085, Wis. Adm. Code for development on a property which contains solid waste as proposed in the submittal dated April 9, 2012, subject to the following conditions:

1. No action related to the development of the Property may be taken which will cause a significant adverse impact on wetlands as provided in ch. NR 103, Wis. Adm. Code.

2. No action related to the development of the Property may be taken which will cause a significant adverse impact on critical habitat areas, as defined in s. NR 500.03(55), Wis. Adm. Code.

3. No action related to the development of the Property may be taken which will cause a detrimental effect on any surface water, as defined in s. NR 500.03(62), Wis. Adm. Code.

4. No action related to the development of the Property may be taken which will cause a detrimental effect on groundwater, as defined in s. NR 500.03(62), Wis. Adm. Code, or will cause or exacerbate an attainment or exceedance of any preventive action limit or enforcement standard at a point of standards application as defined in ch. NR 140, Wis. Adm. Code.

5. No action related to the development of the Property may be taken which will cause a migration and concentration of explosive gases in any structures in excess of 25% of the lower explosive limit for such gases at any time. No actions may be taken which will cause a migration and concentration of explosive gases in the soils outside of the limits of solid waste disposal within 200 feet of the property boundary or beyond the property boundary in excess of the lower explosive limit for such gases at any time. No actions may be taken which will cause a migration and concentration of explosive gases in the air outside of the limits of solid waste disposal within 200 feet of the landfill boundary or beyond the landfill property boundary in excess of the lower explosive limit for such gases at any time.

6. No action related to the development of the Property may be taken which will cause an emission of any hazardous air contaminant exceeding the limitations for those substances contained in s. NR 445.03, Wis. Adm. Code.

7. No action related to the development of the Property may be taken which will cause an exceedance of a soil clean up standard in ch. NR 720, Wis. Adm. Code.

8. This exemption shall transfer with changes in Property ownership. In accordance with s.289.46(2), Stats., any person having or acquiring rights of ownership in land where a solid or hazardous waste disposal facility was previously operated may not undertake any activities on the land which interfere with the closed facility causing a significant threat to public health, safety or welfare. The Department of Natural Resources should be contacted to discuss any proposed changes to avoid activities that could violate the statute.

9. This grant of exemption is limited to the proposed changes described in your application. If you are considering additional changes beyond those described in the application, a new application must be submitted to the Department for approval.

10. Temporary storage of contaminated soils, concrete, and masonry on or off the Property, relocation and/or disposal of any solid waste on the Property, and beneficial reuse of any soil or waste on the Property must be in compliance with a Low Hazard Grant of Exemption to be issued by the Waste and Materials Management Program.

11. Institutional controls and capping required for the Property by the Remediation and Redevelopment Program and Waste and Materials Management Program must be implemented.

The Department reserves the right to require the submittal of additional information and to modify this grant of exemption at any time, if in the Department's opinion, modifications are necessary. Unless specifically noted, the conditions of this grant of exemption do not supersede or replace any previous conditions of approval for the Property.

NOTICE OF APPEAL RIGHTS

If you believe that you have a right to challenge this decision, you should know that the Wisconsin statutes and administrative rules establish time periods within which requests to review Department decisions must be filed. For judicial review of a decision pursuant to sections 227.52 and 227.53, Wis. Stats., you have 30 days after the decision is mailed, or otherwise served by the Department, to file your petition with the appropriate circuit court and serve the petition on the Department. Such a petition for judicial review must name the Department of Natural Resources as the respondent.

To request a contested case hearing pursuant to section 227.42, Wis. Stats., you have 30 days after the decision is mailed, or otherwise served by the Department, to serve a petition for hearing on the Secretary of the Department of Natural Resources. All requests for contested case hearings must be made in accordance with section NR 2.05(5), Wis. Adm. Code, and served on the Secretary in accordance with section NR 2.03, Wis. Adm. Code. The filing of a request for a contested case hearing does not extend the 30 day period for filing a petition for judicial review.

Dated: ____April 25, 2012_____

DEPARTMENT OF NATURAL RESOURCES
For the Secretary

Roxanne N. Chronert, Team Supervisor
Northeast Region Remediation & Redevelopment Program

Jennifer Borski, Hydrogeologist
Northeast Region


JOSHUA MODDER ET AL
1-0730
JOHN PETERSON ET AL
1-0731
NICHOLAS MARAVOLO
1-0525
JAMES EVANS
1-0751
PETER ELLIKER
1-0750
DARRELL WELKE
1-0748
CHRISTOPHER SERRA
1-0749
PATRICK COFFEY
1-0528
STEWART BURNEY
1-0527
KATHLEEN WIESMANN
1-0526
MICHAEL MEVIS
1-0752
ALTON C
JEFFREY KRUEGER
1-0538
KEVIN DIECK
1-0539
MICHAEL MEVIS
1-0753
PAUL SCHREITER
1-0754
APPLETON CITY OF
1-0732
APPLETON CITY OF
1-0735
SOUTH COURT
HOUSING PARTNERSHIP FOX CITIES
1-0541
SALLY FOSTER
1-0542
ROBERT PATRICK
1-0540
KEVIN RÖWOLD
1-0543
MICHAEL RIVERS ET AL
1-0555
MICHAEL FLEMING
1-0554
PATRICIA PIERCE TRUST
1-0553
KHALDOON ALASWAD ET AL
1-0768
DENNIS QUINLAN
1-0769
TIMOTHY WEBSTER
1-0743
KENNETH JOHNSON
1-0744
VICTOR LUTZ
1-0745
THOMAS BAUMHARDT
1-0769-1
ROSS MUELLER
1-0770
JOSEPH TROY
1-0746
ROSS MUELLER
1-0747
APPLETON CITY OF
1-0772
GERALD RISNER
1-0759
ALBERT BELLG
1-0760
ROBERT BUCHANAN
1-0764-1
ERIC RHODE ET AL
1-0761
U S GOVERNMENT
1-0766
1-0764
DONALD BEHM
1-0762
WISCONSIN ELECTRIC POWER CO
1-0765-1
UNION PACIFIC RAILROAD
1-0771
STATE OF WISCONSIN
1-0765
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Figures

WDNR BRRTS #:	0245530084
Site Name:	FOREMOST FARMS (FORMER)
WDNR Facility ID:	445031510
PLSS:	T21 R17E S25
Parcel No.:	311077200

Lat/Long:	44° 15' 35.092" N	88° 23' 29.697" W
Dec. Long/Lat:	-88.391582	44.259748
WTM91 (m):	648,390	421,981
County Coord (ft):	831,405	561,488

Note:
The City of Appleton has a municipal water supply system. There are no known potable wells within 1200 feet of the project location.

OMNNI ASSOCIATES
ONE SYSTEMS DRIVE PHONE (920) 735-6900
APPLETON, WI 54914 FAX (920) 830-6100

N W E S

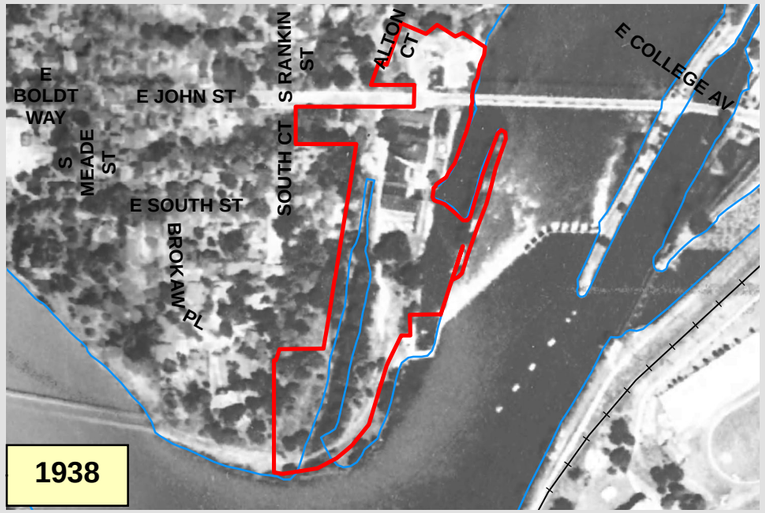
EAGLE POINT SENIOR LIVING

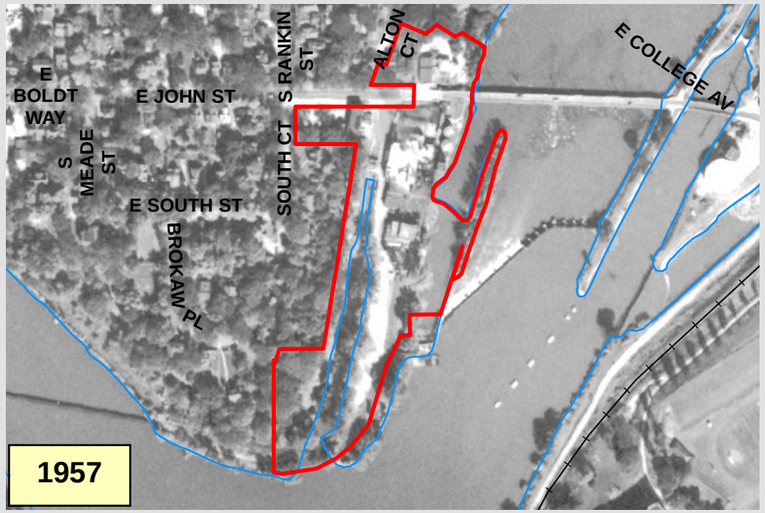
LOCATION MAP

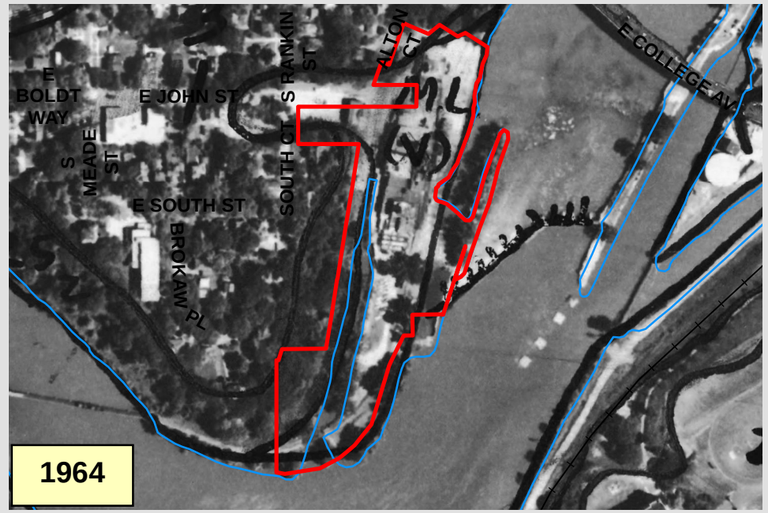
935 E JOHN STREET
CITY OF APPLETON, OUTAGAMIE COUNTY, WISCONSIN

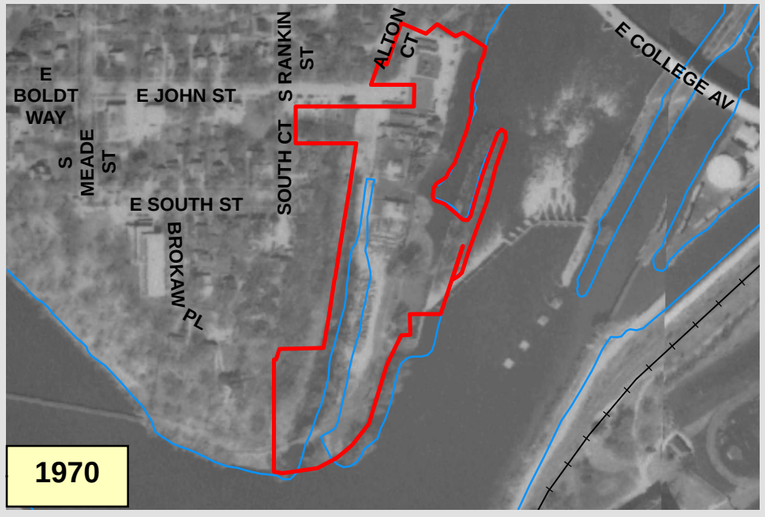
SCALE: AS SHOWN		BRRTS NO. **0245530084**
Drawn By:	JCW	OMNNI PROJECT NO. **M1445C16**
Checked By:	BDW	
Date:	10/20/2016	FIGURE NO. **1**

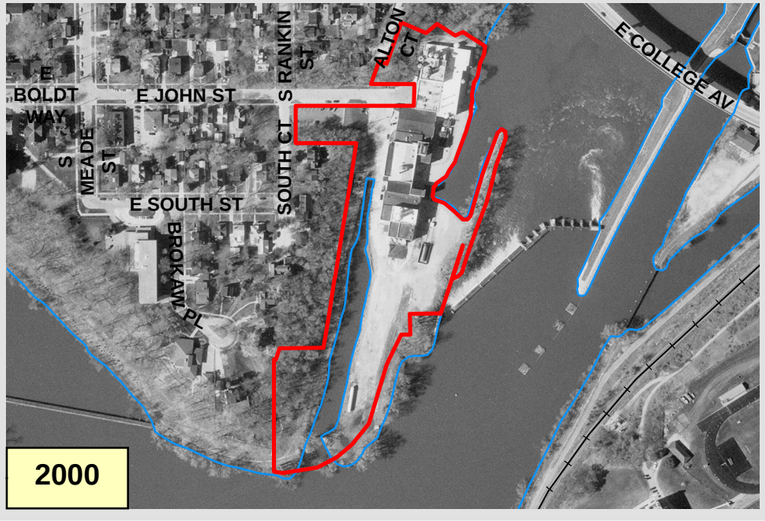
F:\Municipal\Jobs\M1445C16 -IconiCare - Foremost Dairy Redevelopment\GIS\HF Location Map.mxd

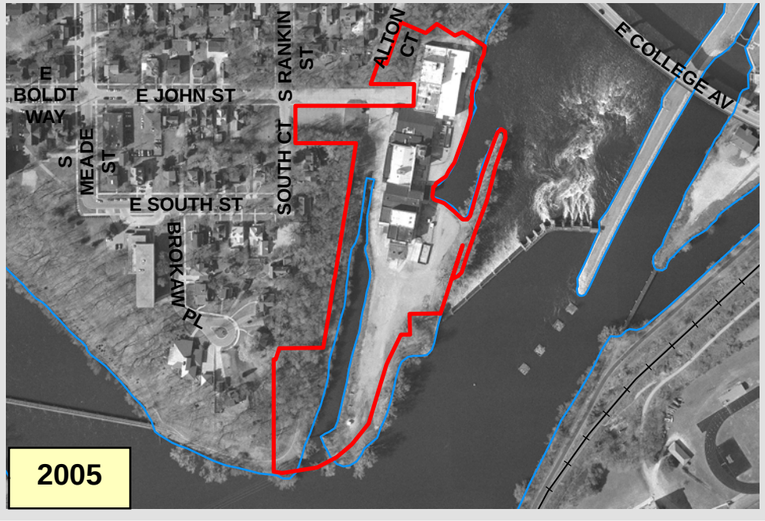












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Project Manager:	BDW		
Project Engineer:	BDW		
Drawn By:	JCW	Checked By:	BDW
Date:	10/20/2016		

EAGLE POINT SENIOR LIVING

HISTORICAL ORTHOPHOTOS - 1938 TO 2010

CITY OF APPLETON
OUTAGAMIE COUNTY, WISCONSIN

OMNNI ASSOCIATES
ONE SYSTEMS DRIVE
APPLETON, WI 54914
PHONE (920) 735-6900
FAX (920) 830-6100

SCALE:
1 " = 417 '

PROJECT NO.
M1445C16

FIGURE NO.
2

F:\Municipal\Jobs\M1445C16 -koniCare - Foremost Dairy Redevelopment\GIS\HF_Historical_3x3.mxd

Site
Parcels
W Water Main
S Sanitary Sewer
S Storm Sewer

Historical Boring Locations (approx)

Soil Boring
Geotechnical Boring
Geotechnical/Environmental Boring
Geoprobe Environmental Boring

Historical Well Locations (approx)

Abandoned Monitoring Well
Active Monitoring Well
Abandoned Water Well

Former Building Extents (approx)
Soil Boring Locations (6/2016)
Soil Boring Locations (10/2014)
Soil Borings Locations (2/2013)

E JOHN ST
ALTON CT
SOUTH CT
Future Single Family Development
B01-IC
B02-IC
B1
B2
B3
B4
B03-IC
B04-IC
B05-IC
B05A-IC
B06-IC
B07-IC
B08-IC
B09-IC
B10-IC
B10
B11
B11-IC
B12
B13
B14
B15
B16
B17
B5
B6
B7
B8
B9
AGM-SB-1
AGM-SB-2
AGM-SB-3
AGM-SB-4
AGM-SB-5
AGM-SB-7
AGM-SB-8
AGM-SB-9
AGM-SB-10
AGM-SB-11
AGM-SB-12
AGM-GP-1
AGM-GP-2
AGM-GP-3
AGM-GP-4
AGM-GP-5
AGM-GP-6
AGM-GP-100
AGM-GP-101
AGM-GP-102
AGM-GP-103
AGM-GP-104
AGM-GP-105
AGM-GP-106
AGM-GP-107
AGM-GP-108
AGM-GP-109
AGM-GP-110
AGM-GP-111
AGM-GP-112
AGM-GP-113
AGM-GP-114
AGM-GP-115
AGM-GP-116
AGM-GP-117
AGM-GP-118
AGM-GP-119
AGM-GP-120
AGM-GP-121
MW1
MW2
MW3
MW4
MW5
MW6
MW7
MW8
FF1
BE760
BE761

0 100 200 Feet

Project Manager: BDW
Project Engineer: BDW
Drawn By: JCW
Checked By: BDW
Date: 10/20/2016

EAGLE POINT SENIOR LIVING

SITE DETAIL MAP

CITY OF APPLETON, OUTAGAMIE COUNTY, WISCONSIN

OMNI ASSOCIATES
ONE SYSTEMS DRIVE APPLETON, WI 54914
PHONE (920) 735-6900
FAX (920) 830-6100

SCALE: 1 " = 100 '

PROJECT NO. M1445C16

FIGURE NO. 3

F:\Municipal\Jobs\M1445C16 -kcni\Care - Foremost Dairy Redeveloppment\GIS\HF Site Detail Map_withLayout.mxd

Project Site
1/2 mile radius
Wetlands (small)
Home < 300 ft
Home 300-1000 ft

1000'
300'
26'
2244'
2605'

0 600 1,200 Feet

N
W E
S

Project Manager:	BDW	
Project Engineer:	BDW	
Drawn By:	JCW	
Checked By:	BDW	
Date:		9/27/2016

EAGLE POINT SENIOR LIVING

HISTORIC FILL EXEMPTION - DISTANCES

CITY OF APPLETON
OUTAGAMIE COUNTY, WISCONSIN

OMNI ASSOCIATES
ONE SYSTEMS DRIVE PHONE (920) 735-6900
APPLETON, WI 54914 FAX (920) 830-6100

SCALE: 1 " = 600 '

PROJECT NO. M1445C16

FIGURE NO. 4

F:\Municipal\Jobs\M1445C16 -IconiCare - Foremost Dairy Redevelopment\GIS\HF Distances.mxd

Project Manager: BDW
Project Engineer: BDW
Drawn By: JCW
Checked By: BDW
Date: 10/20/2016

EAGLE POINT SENIOR LIVING

DEVELOPMENT ZONES

CITY OF APPLETON, OUTAGAMIE COUNTY, WISCONSIN

OMNI ASSOCIATES
ONE SYSTEMS DRIVE APPLETON, WI 54914
PHONE (920) 735-6900
FAX (920) 830-6100

SCALE: 1 " = 100 '

PROJECT NO. **M1445C16**

FIGURE NO. **5**

F:\Municipal\Jobs\M1445C16 -IconiCare - Foremost Dairy Redevelopment\GIS\HF Site Detail Map_withZones.mxd

CONTAMINATED SOIL CUT VOLUME
3,350 CY

CONTAMINATED SOIL CUT DEPTH			
RANGE	MIN ELEV	MAX ELEV	COLOR
1	-16.0	-14.0	
2	-14.0	-12.0	
3	-12.0	-10.0	
4	-10.0	-8.0	
5	-8.0	-6.0	
6	-6.0	-4.0	
7	-4.0	-2.0	
8	-2.0	0.0	

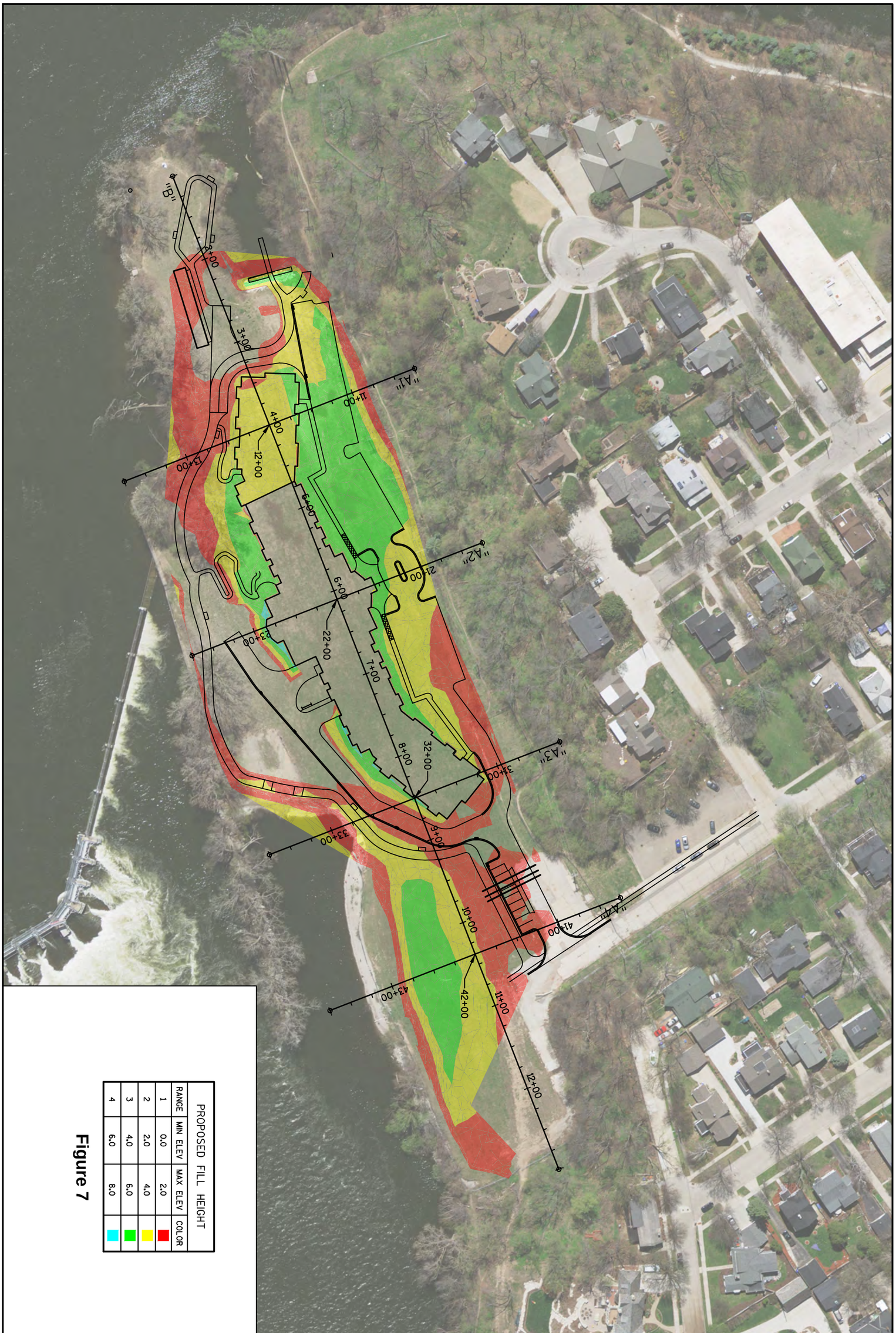
Figure 6

OMNI ASSOCIATES
ONE SYSTEMS DRIVE
APPLETON, WI 54914
PHONE: (920) 735-6900
FAX: (920) 830-6100

OMNI ASSOCIATES

EAGLE POINT SENIOR LIVING
CONTAMINATED SOIL EXCAVATION

PROJECT NO: M1445C16
DRAWN BY: ADW
DATE: 09/29/2016
SHEET: 1 OF 1



PROPOSED FILL HEIGHT			
RANGE	MIN ELEV	MAX ELEV	COLOR
1	0.0	2.0	
2	2.0	4.0	
3	4.0	6.0	
4	6.0	8.0	

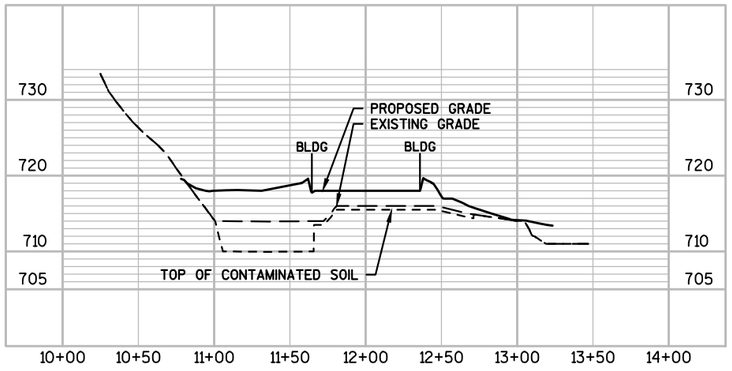
Figure 7

PROJECT NO:	M1445C16
DRAWN BY:	ADW
DATE:	10/21/2016
SHEET:	1 OF 1

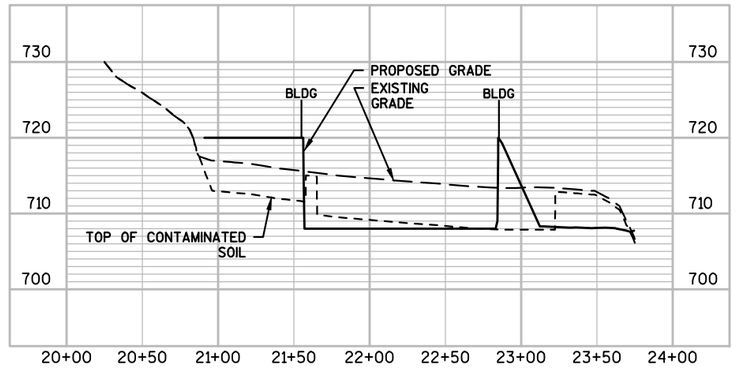
EAGLE POINT SENIOR LIVING
PROPOSED OVERALL FILL LOCATIONS

OMNNI ASSOCIATES
ONE SYSTEMS DRIVE
APPLETON, WI 54914
PHONE: (920) 735-6900
FAX: (920) 830-6100

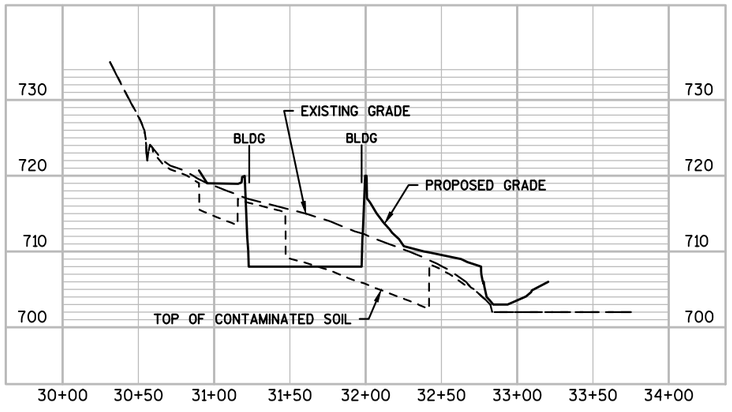
"A1"
STA 10+00 TO STA 14+00
V SCALE : 20 H SCALE : 100



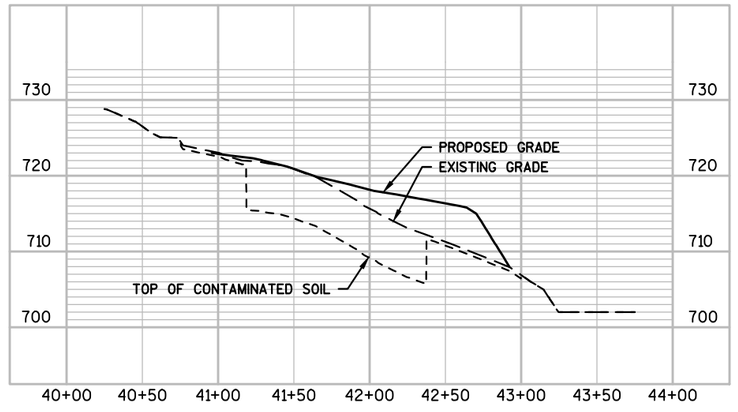
"A2"
STA 20+00 TO STA 24+00
V SCALE : 20 H SCALE : 100



"A3"
STA 30+00 TO STA 34+00
V SCALE : 20 H SCALE : 100



"A4"
STA 40+00 TO STA 44+00
V SCALE : 20 H SCALE : 100



"B"
STA 1+00 TO STA 13+00
V SCALE : 20 H SCALE : 100

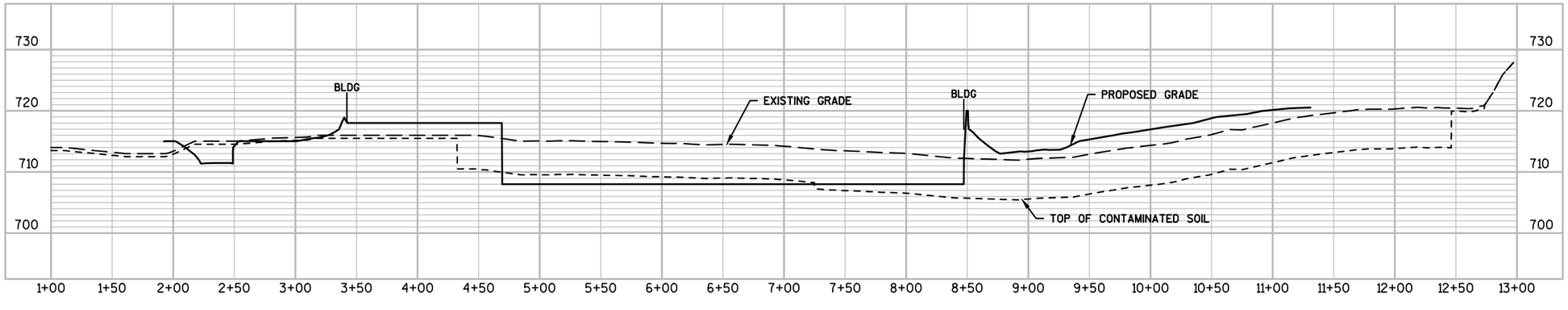


Figure 8

OMNI ASSOCIATES
ONE SYSTEMS DRIVE
APPLETON, WI 54914
PHONE: (920) 735-6900
FAX: (920) 830-6100

OMNI ASSOCIATES

EAGLE POINT SENIOR LIVING
PROPOSED CUT / FILL SECTION VIEWS

PROJECT NO: M1445C16
DRAWN BY: ADW
DATE: 10/21/2016
SHEET: 1 OF 1

Tables

ARCADIS Table 3. Summary of Analytical Results for Soil Located Outside of the Development Area,
Former FFUSA Site

Table 3. Summary of Analytical Results for Soil Located Outside of Development Area, Former FFUSA Site, 935 E. John Street, Appleton, Wisconsin.

Location				AGM-GP-100		AGM-GP-101		AGM-GP-102		AGM-GP-105	
Sample Date	NR 720	NR 720	GW	10/20/11	10/20/11	10/17/11	10/17/11	10/17/11	10/17/11	10/18/11	10/18/11
Depth Range[1]	IND DC	NON-IND DC[2]	Pathway[3]	2 - 4	4 - 6	2 - 4	6 - 8	2 - 4	8 - 10	2 - 4	6 - 8
GRO (mg/kg)	--	--	100	NA	NA	NA	NA	NA	NA	NA	NA
Anions (mg/kg)											
Sulfate	--	--	--	NA	NA	NA	NA	NA	NA	NA	NA
Metals (mg/kg)											
Arsenic	1.6	0.039	--	**11.2**	**7**	**3.9**	**29.9**	**3.9**	**8.7**	**3.6**	**2.8**
Barium	4,500	344	330	78.4	117	11.8	39.3	74.1	77.4	68.3	54.2
Cadmium	510	8	1.5	0.19	0.25	0.095	0.48	0.14	0.25	0.12	0.068
Chromium	33,700	16,000	200,000	17.7	23	12	11.9	26.4	20.3	25.1	18
Lead	500	50	--	57.5	35.4	10	29.3	16.4	47.6	8.1	4.5
Mercury	6,880	4,920	0.21	0.083	0.11	0.13	0.78	0.031	0.055	0.025	0.0068
Selenium	11.2	8.6	1	0.77	0.67	<2.1	<2.4	<2.4	<2.2	<2.0	<2.1
Silver	11.2	8.6	1.67	0.16	0.2	<1.1	0.11	0.15	0.15	0.11	0.096
VOCs (µg/kg)											
Benzene	--	1,100	5.5	NA	NA	NA	NA	NA	NA	NA	NA
N-Butylbenzene	--	--	--	NA	NA	NA	NA	NA	NA	NA	NA
Cymene	--	--	--	NA	NA	NA	NA	NA	NA	NA	NA
1,2-Dichlorobenzene	--	--	--	NA	NA	NA	NA	NA	NA	NA	NA
Ethylbenzene	--	--	2,900	NA	NA	NA	NA	NA	NA	NA	NA
Isopropylbenzene	--	--	--	NA	NA	NA	NA	NA	NA	NA	NA
Naphthalene	110,000	20,000	400	NA	NA	NA	NA	NA	NA	NA	NA
2-Phenylbutane	--	--	--	NA	NA	NA	NA	NA	NA	NA	NA
N-Propylbenzene	--	--	--	NA	NA	NA	NA	NA	NA	NA	NA
Tetrachloroethene	--	--	--	NA	NA	NA	NA	NA	NA	NA	NA
Toluene	--	--	1,500	NA	NA	NA	NA	NA	NA	NA	NA
1,1,1-Trichloroethane	--	--	--	NA	NA	NA	NA	NA	NA	NA	NA
1,2,4-Trimethylbenzene	--	--	83,000	NA	NA	NA	NA	NA	NA	NA	NA
1,3,5-Trimethylbenzene	--	--	11,000	NA	NA	NA	NA	NA	NA	NA	NA
m,p-Xylene	--	--	--	NA	NA	NA	NA	NA	NA	NA	NA
o-Xylene	--	--	--	NA	NA	NA	NA	NA	NA	NA	NA
Xylenes (total)	--	--	4,100	NA	NA	NA	NA	NA	NA	NA	NA
SVOCs (µg/kg)											
Acenaphthene	60,000,000	900,000	38,000	<21.9	<21.7	2.9	12.7	35.4	15.4	13.4	<19.5
Acenaphthylene	360,000	18,000	700	4.8	4.3	4.7	9.6	41.5	34.7	23.5	<19.5

Footnotes on Page 2.

Table 3. Summary of Analytical Results for Soil Located Outside of Development Area, Former FFUSA Site, 935 E. John Street, Appleton, Wisconsin.

Location				AGM-GP-100		AGM-GP-101		AGM-GP-102		AGM-GP-105	
Sample Date	NR 720	NR 720	GW	10/20/11	10/20/11	10/17/11	10/17/11	10/17/11	10/17/11	10/18/11	10/18/11
Depth Range[1]	IND DC	NON-IND DC[2]	Pathway[3]	2 - 4	4 - 6	2 - 4	6 - 8	2 - 4	8 - 10	2 - 4	6 - 8
SVOCs (µg/kg) (continued)											
Anthracene	300,000,000	5,000,000	3,000,000	<21.9	<21.7	8.2	35.9	159	70.2	<19.5	<19.5
Benzo(a)Anthracene	3,900	88	17,000	7.7	15.5	22.8	36.9	291	184	75.4	<19.5
Benzo(a)Pyrene	390	8.8	48,000	9.4	14.1	29.6	30.7	276	236	90.5	<19.5
Benzo(b)fluoranthene	3,900	88	360,000	8.6	11.9	23.8	19.7	211	197	75.8	<19.5
Benzo(g,h,i)Perylene	39,000	1,800	6,800,000	27.9	12.3	34.9	21.8	195	255	79.4	<19.5
Benzo(k)Fluoranthene	39,000	880	870,000	8.5	11.5	20.8	22.1	217	164	70.1	<19.5
Benzoic Acid	--	--	--	NA	NA	NA	NA	NA	NA	NA	NA
Carbazole	--	--	--	NA	NA	NA	NA	NA	NA	NA	NA
Chrysene	390,000	8,800	37,000	9	20.8	27.6	45.7	311	230	94.4	<19.5
Dibenzo(a,h)Anthracene	390	8.8	38,000	9.8	8.7	12.3	11.7	67.4	74	21.2	<19.5
Dibenzofuran	--	--	--	NA	NA	NA	NA	NA	NA	NA	NA
Di-N-Butyl Phthalate	--	--	--	NA	NA	NA	NA	NA	NA	NA	NA
Fluoranthene	40,000,000	600,000	500,000	12.6	24.2	43.9	65.6	612	307	172	<19.5
Fluorene	40,000,000	600,000	100,000	<21.9	<21.7	<18.0	12.7	63.3	17.7	5.7	<19.5
Indeno(1,2,3-cd)Pyrene	3,900	88	680,000	20.3	14	27.2	18	165	188	59.8	<19.5
1-Methylnaphthalene	70,000,000	1,100,000	23,000	8	14.4	10.8	169	203	24.8	29.6	<19.5
2-Methylnaphthalene	40,000,000	600,000	20,000	10.5	20.3	13.2	210	261	36.9	37.1	<19.5
Naphthalene	110,000	20,000	400	10.9	19.5	10.4	142	214	56.5	34.8	<19.5
Phenanthrene	390,000	18,000	18,00	11.5	17.1	41.3	187	829	186	110	<19.5
Pyrene	30,000,000	500,000	8,700,000	16.2	29.1	51.2	91.4	718	372	174	<19.5

1	Based on existing grade, final grade will be 6-inches below a clean soil vegetative cap.
2	WDNR NR 720 Generic Non-Industrial Direct Contact RCLs or NR 746 Direct Contact RCLs.
3	WDNR NR 720 RCLs for protection of groundwater or NR 746 residual product (whichever is lesser).
--	Generic regulatory criteria not established.
Underline	Value exceeds NR 720 residual contaminant levels (RCLs) for protection of groundwater.
Bold	Value exceeds the generic NR 720 industrial direct contact RCLs.
Box	Value exceeds the generic NR 720 non-industrial direct contact RCLs.
DRO	Diesel Range Organics.
µg/kg	Micrograms per kilogram.
mg/kg	Milligrams per kilogram.
NA	Not analyzed.
NR 720 IND DC	WDNR NR 720 Generic Industrial Direct Contact RCLs.
NR 720 NON-IND DC	WDNR NR 720 Generic Non-Industrial Direct Contact RCLs.
SVOCs	Semi-Volatile Organic Compounds.
VOCs	Volatile Organic Compounds.

Table 3. Summary of Analytical Results for Soil Located Outside of Development Area, Former FFUSA Site, 935 E. John Street, Appleton, Wisconsin.

Location	AGM-GP-112		AGM-GP-118		AGM-GP-119		AGM-121			GP-2	GP-3
Sample Date	10/20/11	10/20/11	10/18/11	10/18/11	10/18/11	10/18/11	10/17/11	10/17/11	10/17/11	04/26/04	04/26/04
Depth Range[1]	0 - 2	4 - 6	2 - 4'	6 - 8'	2 - 4'	8 - 10'	0 - 2'	2 - 4'	6 - 8'	2 - 4	0 - 2
GRO (mg/kg)	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Anions (mg/kg)											
Sulfate	NA	NA	NA	NA	NA	NA	NA	NA	NA	29	320
Metals (mg/kg)											
Arsenic	**5.6**	**6**	**4.0**	**2.4**	**2.4**	**2.5**	**3.5**	**3.6**	**2.9**	**1.8**	**2.4**
Barium	69	81.7	67.5	67.0	43.0	35.0	67.7	64.1	61.0	8.6	63
Cadmium	0.23	0.36	0.38	0.092	0.10	0.075	0.098	0.098	0.096	0.47	1.1
Chromium	18.6	10.5	19.9	21.0	17.7	16.9	24.1	26.0	22.4	4.5	25
Lead	45.7	98.9	17.7	9.9	5.6	4.2	5.2	5.2	4.9	2.7	3.5
Mercury	0.16	0.32	0.074	0.095	0.047	0.018	0.0075	0.0099	0.0073	<0.0200	<0.0200
Selenium	0.5	0.55	0.52	<2.3	<2.2	<2.2	<2.3	<2.2	<2.3	**13**	10
Silver	0.17	0.16	<1.1	<1.2	<1.1	<1.1	0.14	0.12	0.10	0.34	0.36
VOCs (µg/kg)											
Benzene	NA	NA	NA	NA	NA	NA	NA	NA	NA	<4.80	<4.80
N-Butylbenzene	NA	NA	NA	NA	NA	NA	NA	NA	NA	<5.80	<5.80
Cymene	NA	NA	NA	NA	NA	NA	NA	NA	NA	<8	<8
1,2-Dichlorobenzene	NA	NA	NA	NA	NA	NA	NA	NA	NA	<8.80	<8.80
Ethylbenzene	NA	NA	NA	NA	NA	NA	NA	NA	NA	<3.60	<3.60
Isopropylbenzene	NA	NA	NA	NA	NA	NA	NA	NA	NA	<6.70	<6.70
Naphthalene	NA	NA	NA	NA	NA	NA	NA	NA	NA	<17	<17
2-Phenylbutane	NA	NA	NA	NA	NA	NA	NA	NA	NA	<5.10	<5.10
N-Propylbenzene	NA	NA	NA	NA	NA	NA	NA	NA	NA	<8.10	<8.10
Tetrachloroethene	NA	NA	NA	NA	NA	NA	NA	NA	NA	<8.70	<8.70
Toluene	NA	NA	NA	NA	NA	NA	NA	NA	NA	<4.30	<4.30
1,1,1-Trichloroethane	NA	NA	NA	NA	NA	NA	NA	NA	NA	<12	<12
1,2,4-Trimethylbenzene	NA	NA	NA	NA	NA	NA	NA	NA	NA	<9.80	<9.80
1,3,5-Trimethylbenzene	NA	NA	NA	NA	NA	NA	NA	NA	NA	<3.80	<3.80
m,p-Xylene	NA	NA	NA	NA	NA	NA	NA	NA	NA	<10	<10
o-Xylene	NA	NA	NA	NA	NA	NA	NA	NA	NA	<6.10	<6.10
Xylenes (total)	NA	NA	NA	NA	NA	NA	NA	NA	NA	<16.10	<16.10
SVOCs (µg/kg)											
Acenaphthene	44.2	1,360	4.3	3.4	<18.8	<19.5	<19.5	<19.7	<20.1	<28	<28
Acenaphthylene	64.9	319	4.3	3.8	<18.8	<19.5	<19.5	<19.7	<20.1	<32	<32

Footnotes on Page 4.

Table 3. Summary of Analytical Results for Soil Located Outside of Development Area, Former FFUSA Site, 935 E. John Street, Appleton, Wisconsin.

Location	AGM-GP-112		AGM-GP-118		AGM-GP-119		AGM-121			GP-2	GP-3
Sample Date	10/20/11	10/20/11	10/18/11	10/18/11	10/18/11	10/18/11	10/17/11	10/17/11	10/17/11	04/26/04	04/26/04
Depth Range[1]	0 - 2	4 - 6	2 - 4'	6 - 8'	2 - 4'	8 - 10'	0 - 2'	2 - 4'	6 - 8'	2 - 4	0 - 2
SVOCs (µg/kg) (continued)											
Anthracene	193	3,350	10.1	26.3	<18.8	<19.5	<19.5	<19.7	<20.1	<46	<46
Benzo(a)Anthracene	491	**4,050**	15.3	38.0	3.4	<19.5	<19.5	<19.7	<20.1	<33	<33
Benzo(a)Pyrene	**518**	**3,920**	13.5	29.4	3.3	<19.5	<19.5	<19.7	<20.1	<43	<43
Benzo(b)fluoranthene	378	3,240	12.5	18.6	<18.8	<19.5	<19.5	<19.7	<20.1	<42	<42
Benzo(g,h,i)Perylene	354	2,870	11.0	16.7	<18.8	<19.5	<19.5	<19.7	<20.1	<32	<32
Benzo(k)Fluoranthene	394	3,010	10.7	24.2	<18.8	<19.5	<19.5	<19.7	<20.1	<45	<45
Benzoic Acid	NA	NA	NA	NA	NA	NA	NA	NA	NA	110	120
Carbazole	NA	NA	NA	NA	NA	NA	NA	NA	NA	<57	<57
Chrysene	528	4,380	22.0	36.2	<18.8	<19.5	<19.5	<19.7	<20.1	<46	<46
Dibenzo(a,h)Anthracene	129	**1,030**	<21.4	10.9	<18.8	<19.5	<19.5	<19.7	<20.1	<47	<47
Dibenzofuran	NA	NA	NA	NA	NA	NA	NA	NA	NA	<39	<39
Di-N-Butyl Phthalate	NA	NA	NA	NA	NA	NA	NA	NA	NA	31	110
Fluoranthene	1,090	11,000	34.4	75.2	<18.8	<19.5	<19.5	<19.7	<20.1	<30	<30
Fluorene	67.1	1,650	<21.4	7.5	<18.8	<19.5	<19.5	<19.7	<20.1	<32	<32
Indeno(1,2,3-cd)Pyrene	321	2,530	8.5	20.4	<18.8	<19.5	4.5	<19.7	4.4	<56	<56
1-Methylnaphthalene	25.8	621	63.0	14.9	<18.8	<19.5	<19.5	<19.7	<20.1	<47	<47
2-Methylnaphthalene	27.9	778	84.0	22.0	<18.8	<19.5	<19.5	<19.7	4.3	<22	<22
Naphthalene	33.7	1,240	59.0	11.8	<18.8	<19.5	<19.5	<19.7	5.2	<39	<39
Phenanthrene	739	15,200	76.4	59.0	<18.8	<19.5	<19.5	<19.7	<20.1	<36	<36
Pyrene	1,020	11,800	36.6	113	4.5	<19.5	<19.5	<19.7	<20.1	<39	<39

1	Based on existing grade, final grade will be 6-inches below a clean soil vegetative cap.
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Box	Value exceeds the generic NR 720 non-industrial direct contact RCLs.
DRO	Diesel Range Organics.
µg/kg	Micrograms per kilogram.
mg/kg	Milligrams per kilogram.
NA	Not analyzed.
NR 720 IND DC	WDNR NR 720 Generic Industrial Direct Contact RCLs.
NR 720 NON-IND DC	WDNR NR 720 Generic Non-Industrial Direct Contact RCLs.
SVOCs	Semi-Volatile Organic Compounds.
VOCs	Volatile Organic Compounds.

Table 3. Summary of Analytical Results for Soil Located Outside of Development Area, Former FFUSA Site, 935 E. John Street, Appleton, Wisconsin.

Location	GP-4	GP-5	GP-8	GP-10	GP-12	GP-14		GP-15	GP-16		GP-17	GP-18	GP-19	GP-20
Sample Date	04/26/04	04/26/04	04/27/04	04/27/04	04/27/04	04/27/04	04/27/04	04/27/04	04/26/04		04/26/04	04/27/04	04/27/04	04/27/04
Depth Range[1]	12 - 14	2 - 4	2 - 4	4 - 6	8 - 10'	8 - 10	12 - 14	0 - 2	2 - 4	12 - 14	4 - 6	10 - 12	0 - 2	2 - 4
GRO (mg/kg)	NA	NA	NA	NA	NA	16	<2.90	NA	NA	NA	NA	NA	NA	NA
Anions (mg/kg)														
Sulfate	300	130	220	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Metals (mg/kg)														
Arsenic	**5.6**	**5**	**2.1**	1.3	**3.3**	1.5	NA	**3.3**	**2.2**	**2.1**	**2.1**	1.4	**1.9**	**1.7**
Barium	340	32	55	52	50	57	NA	42	11	19	39	65	52	8
Cadmium	3.6	1.8	1.1	1	0.43	1.2	NA	0.98	0.39	0.46	0.97	0.58	0.66	<0.25
Chromium	10	9.8	17	18	16	21	NA	3.8	3.7	4.2	110	24	6.3	3.4
Lead	490	22	17	3.7	7.1	3.6	NA	21	4	12	67	4.5	28	6.7
Mercury	0.078	0.031	<0.0200	<0.0200	0.022	<0.0200	NA	<0.0200	0.03	0.23	3.7	<0.0200	0.077	<0.0200
Selenium	**34**	**18**	7.8	8.2	7.8	11	NA	10	**14**	5.6	11	**12**	3.9	**13**
Silver	0.46	0.27	<0.25	<0.25	<0.25	<0.25	NA	<0.25	0.34	<0.25	0.25	<0.25	<0.25	<0.25
VOCs (µg/kg)														
Benzene	<48	<3.60	<4.80	<4.80	<4.80	<4.80	NA	<3.60	<4.80	<4.80	<4.80	<4.80	<3.60	<3.60
N-Butylbenzene	<58	<9.80	<5.80	<5.80	<5.80	134	NA	<9.80	<5.80	<5.80	<5.80	<5.80	<9.80	<9.80
Cymene	<80	<6.70	<8	<8	<8	58	NA	<6.70	<8	<8	<8	<8	<6.70	<6.70
1,2-Dichlorobenzene	<88	<5.80	<5.80	<8.80	<8.80	38	NA	<5.80	<8.80	<8.80	<8.80	<8.80	<5.80	<5.80
Ethylbenzene	<36	<17	<3.60	<3.60	<3.60	48	NA	<17	<3.60	<3.60	<3.60	<3.60	34	<17
Isopropylbenzene	<67	<5.10	<6.70	<6.70	<6.70	172	NA	<5.10	<6.70	<6.70	<6.70	<6.70	<5.10	<5.10
Naphthalene	23,500	<4.30	36	<17	<17	388	NA	<4.30	<17	63	<17	<17	<4.30	<4.30
2-Phenylbutane	<51	<8	<5.10	<5.10	<5.10	62	NA	<8	<5.10	<5.10	<5.10	<5.10	<8	<8
N-Propylbenzene	<81	<3.80	<8.10	<8.10	<8.10	337	NA	<3.80	<8.10	<8.10	<8.10	<8.10	<3.80	<3.80
Tetrachloroethene	<87	<6.10	<6.10	<8.70	<8.70	<8.70	NA	<6.10	<8.70	<8.70	<8.70	<8.70	<6.10	<6.10
Toluene	<43	<16.10	<4.30	<4.30	<4.30	<4.30	NA	<16.10	<4.30	25	<4.30	<4.30	<16.10	<16.10
1,1,1-Trichloroethane	<120	<12	<12	<12	<12	<12	NA	<12	<12	<12	<12	<12	<12	<12
1,2,4-Trimethylbenzene	<98	<4.80	<9.80	<9.80	<9.80	809	NA	<4.80	<9.80	<9.80	<9.80	<9.80	<4.80	<4.80
1,3,5-Trimethylbenzene	<38	<6.20	<3.80	<3.80	<3.80	303	NA	<6.20	<3.80	<3.80	<3.80	<3.80	<6.20	<6.20
m,p-Xylene	<100	<8.10	<10	<10	<10	110	NA	<8.10	<10	<10	<10	<10	<8.10	<8.10
o-Xylene	<61	<10	<6.10	<6.10	<6.10	<6.10	NA	<10	<6.10	<6.10	<6.10	<6.10	<10	<10
Xylenes (total)	<161	<18.10	<16.10	<16.10	<16.10	<116.10	NA	<18.10	<16.10	<16.10	<16.10	<16.10	<18.10	<18.10
SVOCs (µg/kg)														
Acenaphthene	6,500	33	<28	<28	<28	<28	NA	<112	<28	1,200	29	<28	<32	<32
Acenaphthylene	19,000	95	89	<32	<32	<32	NA	<128	<32	390	73	<32	<46	<46

Footnotes on Page 6.

Table 3. Summary of Analytical Results for Soil Located Outside of Development Area, Former FFUSA Site, 935 E. John Street, Appleton, Wisconsin.

Location	GP-4	GP-5	GP-8	GP-10	GP-12	GP-14		GP-15	GP-16		GP-17	GP-18	GP-19	GP-20
Sample Date	04/26/04	04/26/04	04/27/04	04/27/04	04/27/04	04/27/04	04/27/04	04/27/04	04/26/04		04/26/04	04/27/04	04/27/04	04/27/04
Depth Range[1]	12 - 14	2 - 4	2 - 4	4 - 6	8 - 10'	8 - 10	12 - 14	0 - 2	2 - 4	12 - 14	4 - 6	10 - 12	0 - 2	2 - 4
SVOCs (µg/kg) (continued)														
Anthracene	54,000	180	100	<46	<46	<46	NA	<184	<46	1,500	146	<46	<46	<46
Benzo(a)Anthracene	**110,000**	190	380	<33	<33	<33	NA	150	<33	2,500	570	<33	<33	<33
Benzo(a)Pyrene	**110,000**	270	**490**	<43	<43	<43	NA	210	<43	**2,000**	**680**	<43	<43	<43
Benzo(b)fluoranthene	**150,000**	80	700	<42	<42	<42	NA	<168	<42	2,400	890	<42	<42	<42
Benzo(g,h,i)Perylene	**44,000**	110	150	<32	<32	<32	NA	210	<32	900	190	<32	<32	<32
Benzo(k)Fluoranthene	**50,000**	130	320	<45	<45	<45	NA	<180	<45	750	470	<45	<45	<45
Benzoic Acid	<8000	120	130	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Carbazole	65,000	180	200	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Chrysene	110,000	<47	440	<46	<46	<46	NA	230	<46	2,400	610	<46	<46	<46
Dibenzo(a,h)Anthracen	**15,000**	39	51	<47	<47	<47	NA	<188	<47	<470	60	<47	<47	<47
Dibenzofuran	19,000	33	47	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Di-N-Butyl Phthalate	<4200	530	25	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Fluoranthene	280,000	37	1000	<30	<30	<30	NA	<120	<30	4,700	1,050	<30	<30	<30
Fluorene	24,000	79	45	<32	<32	<32	NA	<128	<32	850	46	<32	<32	<32
Indeno(1,2,3-cd)Pyrene	**46,000**	<47	150	<56	<56	<56	NA	<224	<56	790	180	<56	<56	<56
1-Methylnaphthalene	<9400	32	50	<47	<47	<47	NA	<188	<47	650	<47	<47	<47	<47
2-Methylnaphthalene	8,500	<39	78	<22	<22	<22	NA	<88	<22	550	<22	<22	<22	<22
Naphthalene	21,000	510	77	<39	<39	68	NA	<156	<39	<390	<39	<39	<39	<39
Phenanthrene	270,000	440	830	<36	<36	<36	NA	<144	<36	4,600	540	<36	<36	<36
Pyrene	230,000	440	930	<39	<39	<39	NA	1300	<39	480	1,100	<39	<39	<39

1	Based on existing grade, final grade will be 6-inches below a clean soil vegetative cap.
2	WDNR NR 720 Generic Non-Industrial Direct Contact RCLs or NR 746 Direct Contact RCLs.
3	WDNR NR 720 RCLs for protection of groundwater or NR 746 residual product (whichever is lesser).
--	Generic regulatory criteria not established.
Underline	Value exceeds NR 720 residual contaminant levels (RCLs) for protection of groundwater.
Bold	Value exceeds the generic NR 720 industrial direct contact RCLs.
Box	Value exceeds the generic NR 720 non-industrial direct contact RCLs.
DRO	Diesel Range Organics.
µg/kg	Micrograms per kilogram.
mg/kg	Milligrams per kilogram.
NA	Not analyzed.
NR 720 IND DC	WDNR NR 720 Generic Industrial Direct Contact RCLs.
NR 720 NON-IND DC	WDNR NR 720 Generic Non-Industrial Direct Contact RCLs.
SVOCs	Semi-Volatile Organic Compounds.
VOCs	Volatile Organic Compounds.

Table 3. Summary of Analytical Results for Soil Located Outside of Development Area, Former FFUSA Site, 935 E. John Street, Appleton, Wisconsin.

Location	GP-23	GP-24	GP-25	GP-28	GP-30	GP-31	GP-32	GP-33	GP-34	GP-42	GP-46	GP-49
Sample Date	04/27/04	04/26/04	04/26/04	04/27/04	04/29/04	04/29/04	04/27/04	04/29/04	04/29/04	04/29/04	04/28/04	04/28/04
Depth Range[1]	6 - 8	2 - 4	0 - 2	2 - 4	0 - 2	0 - 2	4 - 6	4 - 6	2 - 4	2 - 4	2 - 4	2 - 4
GRO (mg/kg)	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Anions (mg/kg)												
Sulfate	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Metals (mg/kg)												
Arsenic	**2.6**	**3.6**	**3.8**	**2.9**	**8.5**	**6.9**	**2.8**	<0.5	**2.9**	**2.2**	**3.8**	**11**
Barium	42	260	18	37	200	16	56	61	38	39	7.2	54
Cadmium	0.34	0.92	0.34	0.26	1.3	0.42	0.46	1	0.44	0.46	<0.25	0.54
Chromium	15	5	7.5	3.7	3.6	10	19	10	13	14	3.8	9.9
Lead	3.5	65	110	25	43	18	4	21	13	6.6	7.8	69
Mercury	<0.0200	0.44	0.11	0.075	0.11	<0.0200	<0.0200	0.027	0.041	0.031	0.021	0.035
Selenium	6.5	**14**	**14**	**15**	**19**	**22**	8.9	**17**	11	8.5	**16**	10
Silver	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25
VOCs (µg/kg)												
Benzene	<3.60	<4.80	<48	<3.60	380	<4.80	<6.70	<4.80	<4.80	47	<4.80	<4.80
N-Butylbenzene	<9.80	<5.80	<58	95	29	<5.80	<8.80	<5.80	<5.80	<5.80	351	<5.80
Cymene	<6.70	<8	<80	<6.70	<8	<8	<10	<8	<8	<8	46	<8
1,2-Dichlorobenzene	<5.80	<8.80	<88	49	<8.80	<8.80	<8.10	<8.80	<8.80	<8.80	<8.80	<8.80
Ethylbenzene	<17	<3.60	<36	903	130	<3.60	<5.80	<3.60	<3.60	94	<3.60	<3.60
Isopropylbenzene	<5.10	<6.70	<67	<5.10	37	<6.70	<4.80	<6.70	<6.70	51	<6.70	<6.70
Naphthalene	<4.30	56	<170	33	245	<17	<4.80	46	<17	165	137	<17
2-Phenylbutane	<8	<5.10	<51	<8	<5.10	<5.10	<3.60	<5.10	<5.10	<5.10	133	<5.10
N-Propylbenzene	<3.80	<8.10	<81	48	52	<8.10	<5.10	<8.10	<8.10	58	<8.10	<8.10
Tetrachloroethene	<6.10	<8.70	<87	48	102	<8.70	<8.70	<8.70	<8.70	<8.70	<8.70	<8.70
Toluene	<16.10	54	<43	99	1,360	<4.30	<25.70	170	<4.30	257	<4.30	<4.30
1,1,1-Trichloroethane	<12	<12	<120	<12	84	<12	<12	<12	<12	<12	<12	<12
1,2,4-Trimethylbenzene	<4.80	26	<98	<4.80	247	<9.80	<6.20	65	<9.80	140	49	<9.80
1,3,5-Trimethylbenzene	<6.20	<3.80	<38	<6.20	48	<3.80	<8	<3.80	<3.80	28	295	<3.80
m,p-Xylene	<8.10	58	<100	<8.10	751	<10	<6.10	71	<10	251	<10	<10
o-Xylene	<10	43	<61	51	399	<6.10	<17	60	<6.10	217	<6.10	<6.10
Xylenes (total)	<18.10	<101	<161	<59.10	1,150	<16.10	<23.10	131	<16.10	468	<16.10	<16.10
SVOCs (µg/kg)												
Acenaphthene	<32	<28	260	<32	<28	<28	<320	<28	<28	<28	<560	<28
Acenaphthylene	<46	76	93	<46	<32	<32	1,700	<32	<32	<32	<640	35

Footnotes on Page 8.

Table 3. Summary of Analytical Results for Soil Located Outside of Development Area, Former FFUSA Site, 935 E. John Street, Appleton, Wisconsin.

Location	GP-23	GP-24	GP-25	GP-28	GP-30	GP-31	GP-32	GP-33	GP-34	GP-42	GP-46	GP-49
Sample Date	04/27/04	04/26/04	04/26/04	04/27/04	04/29/04	04/29/04	04/27/04	04/29/04	04/29/04	04/29/04	04/28/04	04/28/04
Depth Range[1]	6 - 8	2 - 4	0 - 2	2 - 4	0 - 2	0 - 2	4 - 6	4 - 6	2 - 4	2 - 4	2 - 4	2 - 4
SVOCs (µg/kg) (continued)												
Anthracene	<46	<46	290	<46	77	<46	<46	<46	<46	80	<920	62
Benzo(a)Anthracene	<33	490	270	<33	120	<33	2,200	<33	49	220	720	200
Benzo(a)Pyrene	<43	**640**	<43	<43	100	<43	**2,100**	<43	65	200	**1,200**	230
Benzo(b)fluoranthene	<42	1,500	200	<42	170	<42	1,900	<42	95	310	<840	300
Benzo(g,h,i)Perylene	<32	230	<32	<32	<32	<32	920	<32	<32	76	<640	130
Benzo(k)Fluoranthene	<45	570	64	<45	47	<45	<450	<45	<45	120	<900	80
Benzoic Acid	NA	NA	NA	NA	NA	NA	NA	<40	NA	NA	NA	NA
Carbazole	NA	NA	NA	NA	NA	NA	NA	<57	NA	NA	NA	NA
Chrysene	<46	620	280	<46	140	<46	3,200	<46	55	220	1,400	220
Dibenzo(a,h)Anthracene	<47	110	<47	<47	<47	<47	<470	<47	<47	<47	<940	<47
Dibenzofuran	NA	NA	NA	NA	NA	NA	NA	45	NA	NA	NA	NA
Di-N-Butyl Phthalate	NA	NA	NA	NA	NA	NA	NA	53	NA	NA	NA	NA
Fluoranthene	<30	170	510	<30	260	<30	2,200	44	92	370	<600	410
Fluorene	<32	<32	220	<32	<32	<32	1,200	<32	<32	<32	<640	<32
Indeno(1,2,3-cd)Pyrene	<56	250	62	<56	<56	<56	<560	<56	<56	56	<1,120	110
1-Methylnaphthalene	<47	170	410	<47	150	<47	<390	<47	<47	140	<940	<47
2-Methylnaphthalene	<22	210	430	<22	210	<22	1,900	76	<22	180	<440	<22
Naphthalene	<39	130	140	<39	130	<39	470	70	<39	100	<780	<39
Phenanthrene	<36	250	570	<36	310	<36	11,000	110	<36	310	<720	240
Pyrene	<39	230	87	<39	230	<39	17,000	<39	91	350	<780	380

1	Based on existing grade, final grade will be 6-inches below a clean soil vegetative cap.
2	WDNR NR 720 Generic Non-Industrial Direct Contact RCLs or NR 746 Direct Contact RCLs.
3	WDNR NR 720 RCLs for protection of groundwater or NR 746 residual product (whichever is lesser).
--	Generic regulatory criteria not established.
Underline	Value exceeds NR 720 residual contaminant levels (RCLs) for protection of groundwater.
Bold	Value exceeds the generic NR 720 industrial direct contact RCLs.
Box	Value exceeds the generic NR 720 non-industrial direct contact RCLs.
DRO	Diesel Range Organics.
µg/kg	Micrograms per kilogram.
mg/kg	Milligrams per kilogram.
NA	Not analyzed.
NR 720 IND DC	WDNR NR 720 Generic Industrial Direct Contact RCLs.
NR 720 NON-IND DC	WDNR NR 720 Generic Non-Industrial Direct Contact RCLs.
SVOCs	Semi-Volatile Organic Compounds.
VOCs	Volatile Organic Compounds.

Table 3. Summary of Analytical Results for Soil Located Outside of Development Area, Former FFUSA Site, 935 E. John Street, Appleton, Wisconsin.

Location	GP-52	GP-54	GP-55	GP-58	GP-59	GP-61	GP-62		GP-64	GP-67	GP-69
Sample Date	04/28/04	04/28/04	04/28/04	04/28/04	04/28/04	04/28/04	04/28/04		04/27/04	04/27/04	04/27/04
Depth Range[1]	4 - 6'	2 - 4'	0 - 2'	2 - 4'	8 - 10'	2 - 4	2 - 4	10 - 12	8 - 10	0 - 2	4 - 6
GRO (mg/kg)	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Anions (mg/kg)											
Sulfate	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Metals (mg/kg)											
Arsenic	**6.3**	<0.5	**2.2**	**3.6**	**1.7**	**4**	**38**	<0.5	<0.5	**1.9**	**2**
Barium	90	26	19	140	18	48	34	20	30	28	26
Cadmium	1.2	0.26	<0.25	0.68	<0.25	0.41	1.1	0.3	0.53	0.78	0.74
Chromium	11	8.2	6.8	12	8.2	12	9.5	11	7.5	10	8.4
Lead	73	2.5	9.3	240	3.4	34	58	2.6	2.6	3.6	3.4
Mercury	0.25	<0.0200	<0.0200	0.42	<0.0200	0.079	0.44	<0.0200	<0.0200	0.05	<0.0200
Selenium	**18**	5.0	**14**	9.9	10	**14**	**27**	6.4	4.2	**13**	**13**
Silver	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	0.28	0.3
VOCs (µg/kg)											
Benzene	<4.80	<4.80	<4.80	<4.80	<4.80	<4.80	<4.80	<4.80	<4.80	<4.80	<4.80
N-Butylbenzene	<5.80	<5.80	<5.80	<5.80	<5.80	<5.80	<5.80	<5.80	<5.80	<5.80	<5.80
Cymene	93	<8	112	25	16,300	<8	<8	14,000	<8	<8	<8
1,2-Dichlorobenzene	<8.80	<8.80	<8.80	<8.80	<8.80	<8.80	<8.80	<8.80	<8.80	<8.80	<8.80
Ethylbenzene	29	29	<3.60	<3.60	<3.60	<3.60	<3.60	<3.60	<3.60	<3.60	<3.60
Isopropylbenzene	<6.70	<6.70	<6.70	<6.70	<6.70	<6.70	<6.70	<6.70	<6.70	<6.70	<6.70
Naphthalene	<17	<17	<17	90	<17	116	<17	<17	<17	<17	<17
2-Phenylbutane	<5.10	<5.10	<5.10	<5.10	<5.10	<5.10	<5.10	<5.10	<5.10	<5.10	<5.10
N-Propylbenzene	<8.10	<8.10	<8.10	<8.10	<8.10	<8.10	<8.10	<8.10	<8.10	<8.10	<8.10
Tetrachloroethene	<8.70	<8.70	<8.70	<8.70	<8.70	<8.70	<8.70	<8.70	<8.70	<8.70	<8.70
Toluene	111	<4.30	<4.30	26	45	27	<4.30	<4.30	<4.30	<4.30	<4.30
1,1,1-Trichloroethane	<12	<12	<12	<12	<12	<12	<12	<12	<12	<12	<12
1,2,4-Trimethylbenzen	<9.80	<9.80	<9.80	49	<9.80	72	<9.80	<9.80	<9.80	<9.80	<9.80
1,3,5-Trimethylbenzen	<3.80	<3.80	<3.80	<3.80	<3.80	26	<3.80	<3.80	<3.80	<3.80	<3.80
m,p-Xylene	<10	<10	<10	<10	<10	77	<10	<10	<10	<10	<10
o-Xylene	<6.10	<6.10	<6.10	53	<6.10	73	<6.10	<6.10	<6.10	<6.10	<6.10
Xylenes (total)	<16.10	<16.10	<16.10	<63	<16.10	150	<16.10	<16.10	<16.10	<16.10	<16.10
SVOCs (µg/kg)											
Acenaphthene	<280	<28	<28	95	<28	<28	<28	<28	<28	<28	<28
Acenaphthylene	<320	<32	48	<32	<32	<32	<32	<32	<32	<32	<32

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Table 3. Summary of Analytical Results for Soil Located Outside of Development Area, Former FFUSA Site, 935 E. John Street, Appleton, Wisconsin.

Location	GP-52	GP-54	GP-55	GP-58	GP-59	GP-61	GP-62		GP-64	GP-67	GP-69
Sample Date	04/28/04	04/28/04	04/28/04	04/28/04	04/28/04	04/28/04	04/28/04		04/27/04	04/27/04	04/27/04
Depth Range[1]	4 - 6'	2 - 4'	0 - 2'	2 - 4'	8 - 10'	2 - 4	2 - 4	10 - 12	8 - 10	0 - 2	4 - 6
SVOCs (µg/kg) (continued)											
Anthracene	460	<46	150	350	<46	<46	<46	<46	<46	<46	<46
Benzo(a)Anthracene	930	<33	320	630	<33	36	<33	<33	<33	<33	<33
Benzo(a)Pyrene	**820**	<43	270	**570**	<43	<43	<43	<43	<43	<43	<43
Benzo(b)fluoranthene	1,100	<42	470	1,100	<42	57	<42	<42	<42	<42	<42
Benzo(g,h,i)Perylene	540	<32	63	120	<32	<32	<32	<32	<32	<32	<32
Benzo(k)Fluoranthene	<450	<45	180	310	<45	<45	<45	<45	<45	<45	<45
Benzoic Acid	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Carbazole	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Chrysene	900	<46	290	600	<46	<46	<46	<46	<46	<46	<46
Dibenzo(a,h)Anthracer	<470	<47	<47	48	<47	<47	<47	<47	<47	<47	<47
Dibenzofuran	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Di-N-Butyl Phthalate	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Fluoranthene	2,100	<30	610	1,400	<30	73	<30	<30	<30	<30	<30
Fluorene	<320	<32	69	120	<32	<32	<32	<32	<32	<32	<32
Indeno(1,2,3-cd)Pyren	<560	<56	63	120	<56	<56	<56	<56	<56	<56	<56
1-Methylnaphthalene	<470	<47	67	<47	<47	<47	<47	<47	<47	<47	<47
2-Methylnaphthalene	<220	<22	110	36	<22	<22	<22	<22	<22	<22	<22
Naphthalene	<390	<39	49	42	<39	<39	<39	<39	<39	<39	<39
Phenanthrene	1,600	<36	570	1,200	<36	41	<36	<36	<36	<36	<36
Pyrene	1,800	<39	840	1,700	<39	83	<39	<39	<39	<39	<39

1	Based on existing grade, final grade will be 6-inches below a clean soil vegetative cap.
2	WDNR NR 720 Generic Non-Industrial Direct Contact RCLs or NR 746 Direct Contact RCLs.
3	WDNR NR 720 RCLs for protection of groundwater or NR 746 residual product (whichever is lesser).
--	Generic regulatory criteria not established.
Underline	Value exceeds NR 720 residual contaminant levels (RCLs) for protection of groundwater.
Bold	Value exceeds the generic NR 720 industrial direct contact RCLs.
Box	Value exceeds the generic NR 720 non-industrial direct contact RCLs.
DRO	Diesel Range Organics.
µg/kg	Micrograms per kilogram.
mg/kg	Milligrams per kilogram.
NA	Not analyzed.
NR 720 IND DC	WDNR NR 720 Generic Industrial Direct Contact RCLs.
NR 720 NON-IND DC	WDNR NR 720 Generic Non-Industrial Direct Contact RCLs.
SVOCs	Semi-Volatile Organic Compounds.
VOCs	Volatile Organic Compounds.

Table 3. Summary of Analytical Results for Soil Located Outside of Development Area, Former FFUSA Site, 935 E. John Street, Appleton, Wisconsin.

Location	GP-73	GP-74	GP-75	GP-76	GP-77		GP-78	GP-79
Sample Date	04/29/04	04/29/04	04/29/04	03/18/05	03/18/05	03/18/05	09/30/05	09/30/05
Depth Range[1]	8 - 10	12 - 14	8 - 10	12 - 14	10 - 12	12 - 14	2 - 4	2 - 4
GRO (mg/kg)	<2.90	<2.90	<2.90	NA	NA	NA	NA	NA
Anions (mg/kg)								
Sulfate	NA	NA	NA	NA	NA	NA	NA	NA
Metals (mg/kg)								
Arsenic	NA	NA	NA	<0.150	<0.150	0.27	<0.25	<0.25
Barium	NA	NA	NA	52	31	74	58	35
Cadmium	NA	NA	NA	0.48	0.3	0.62	NA	NA
Chromium	NA	NA	NA	23	10	23	NA	NA
Lead	NA	NA	NA	1.2	6.2	0.77	2.8	31
Mercury	NA	NA	NA	0.02	0.014	0.023	NA	NA
Selenium	NA	NA	NA	<0.210	<2.10	<0.210	NA	NA
Silver	NA	NA	NA	<0.0370	<0.0370	<0.0370	NA	NA
VOCs (µg/kg)								
Benzene	NA	NA	NA	NA	NA	NA	NA	NA
N-Butylbenzene	NA	NA	NA	NA	NA	NA	NA	NA
Cymene	NA	NA	NA	NA	NA	NA	NA	NA
1,2-Dichlorobenzene	NA	NA	NA	NA	NA	NA	NA	NA
Ethylbenzene	NA	NA	NA	NA	NA	NA	NA	NA
Isopropylbenzene	NA	NA	NA	NA	NA	NA	NA	NA
Naphthalene	NA	NA	NA	NA	NA	NA	NA	NA
2-Phenylbutane	NA	NA	NA	NA	NA	NA	NA	NA
N-Propylbenzene	NA	NA	NA	NA	NA	NA	NA	NA
Tetrachloroethene	NA	NA	NA	NA	NA	NA	NA	NA
Toluene	NA	NA	NA	NA	NA	NA	NA	NA
1,1,1-Trichloroethane	NA	NA	NA	NA	NA	NA	NA	NA
1,2,4-Trimethylbenzen	NA	NA	NA	NA	NA	NA	NA	NA
1,3,5-Trimethylbenzen	NA	NA	NA	NA	NA	NA	NA	NA
m,p-Xylene	NA	NA	NA	NA	NA	NA	NA	NA
o-Xylene	NA	NA	NA	NA	NA	NA	NA	NA
Xylenes (total)	NA	NA	NA	NA	NA	NA	NA	NA
SVOCs (µg/kg)								
Acenaphthene	NA	NA	NA	<41	<41	<41	<17	<17
Acenaphthylene	NA	NA	NA	<42	<42	<42	<19	<19

Footnotes on Page 11.

Table 3. Summary of Analytical Results for Soil Located Outside of Development Area, Former FFUSA Site, 935 E. John Street, Appleton, Wisconsin.

Location	GP-73	GP-74	GP-75	GP-76	GP-77		GP-78	GP-79
Sample Date	04/29/04	04/29/04	04/29/04	03/18/05	03/18/05	03/18/05	09/30/05	09/30/05
Depth Range[1]	8 - 10	12 - 14	8 - 10	12 - 14	10 - 12	12 - 14	2 - 4	2 - 4
SVOCs (µg/kg) (continued)								
Anthracene	NA	NA	NA	<34	<34	<34	<46	29
Benzo(a)Anthracene	NA	NA	NA	<54	<54	<54	<33	96
Benzo(a)Pyrene	NA	NA	NA	<59	<59	<59	<43	97
Benzo(b)fluoranthene	NA	NA	NA	<42	<42	<42	<42	150
Benzo(g,h,i)Perylene	NA	NA	NA	<82	<82	<82	<32	89
Benzo(k)Fluoranthene	NA	NA	NA	<79	<79	<79	<45	54
Benzoic Acid	NA	NA	NA	NA	NA	NA	NA	NA
Carbazole	NA	NA	NA	NA	NA	NA	NA	NA
Chrysene	NA	NA	NA	<38	<38	<38	<46	157
Dibenzo(a,h)Anthracer	NA	NA	NA	<76	<76	<76	<47	<11
Dibenzofuran	NA	NA	NA	NA	NA	NA	NA	NA
Di-N-Butyl Phthalate	NA	NA	NA	NA	NA	NA	NA	NA
Fluoranthene	NA	NA	NA	<42	56	<42	<30	203
Fluorene	NA	NA	NA	<41	<41	<41	<32	<95
Indeno(1,2,3-cd)Pyren	NA	NA	NA	<69	<69	<69	<56	59
1-Methylnaphthalene	NA	NA	NA	<37	38	<37	<47	35
2-Methylnaphthalene	NA	NA	NA	<72	<72	<72	<22	41
Naphthalene	NA	NA	NA	<40	<40	<40	<39	28
Phenanthrene	NA	NA	NA	<20	123	<20	<36	122
Pyrene	NA	NA	NA	<58	<58	<58	<39	188

1	Based on existing grade, final grade will be 6-inches below a clean soil vegetative cap.
2	WDNR NR 720 Generic Non-Industrial Direct Contact RCLs or NR 746 Direct Contact RCLs.
3	WDNR NR 720 RCLs for protection of groundwater or NR 746 residual product (whichever is lesser).
--	Generic regulatory criteria not established.
Underline	Value exceeds NR 720 residual contaminant levels (RCLs) for protection of groundwater.
Bold	Value exceeds the generic NR 720 industrial direct contact RCLs.
Box	Value exceeds the generic NR 720 non-industrial direct contact RCLs.
DRO	Diesel Range Organics.
µg/kg	Micrograms per kilogram.
mg/kg	Milligrams per kilogram.
NA	Not analyzed.
NR 720 IND DC	WDNR NR 720 Generic Industrial Direct Contact RCLs.
NR 720 NON-IND DC	WDNR NR 720 Generic Non-Industrial Direct Contact RCLs.
SVOCs	Semi-Volatile Organic Compounds.
VOCs	Volatile Organic Compounds.