

## Source Property Information

CLOSURE DATE: 12/20/2013

**BRRTS #:** 02-45-553699  
**ACTIVITY NAME:** FOX VALLEY STEEL & WIRE  
**PROPERTY ADDRESS:** 111 N DOUGLAS ST  
**MUNICIPALITY:** VILLAGE OF HORTONVILLE  
**PARCEL ID #:** 240031100

**FID #:** 445031620

**DATCP #:**

**PECFA#:**

**\*WTM COORDINATES:**

X: 627452 Y: 430245

*\* Coordinates are in  
WTM83, NAD83 (1991)*

**WTM COORDINATES REPRESENT:**

Approximate Center Of Contaminant Source

Approximate Source Parcel Center

Please check as appropriate: (BRRTS Action Code)

### CONTINUING OBLIGATIONS

#### Contaminated Media for Residual Contamination:

Groundwater Contamination > ES (236)

Contamination in ROW

Off-Source Contamination

*(note: for list of off-source properties  
see "Impacted Off-Source Property Information,  
Form 4400-246")*

Soil Contamination > \*RCL or \*\*SSRCL (232)

Contamination in ROW

Off-Source Contamination

*(note: for list of off-source properties  
see "Impacted Off-Source Property Information,  
Form 4400-246")*

#### Site Specific Obligations:

Soil: maintain industrial zoning (220)

*(note: soil contamination concentrations  
between non-industrial and industrial levels)*

Structural Impediment (224)

Site Specific Condition (228)

Cover or Barrier (222)

Direct Contact

Soil to GW Pathway

Vapor Mitigation (226)

Maintain Liability Exemption (230)

*(note: local government unit or economic  
development corporation was directed to  
take a response action)*

#### Monitoring Wells:

All monitoring wells are  
transferred to BRRTS  
#02-45-560221

Are all monitoring wells properly abandoned per NR 141? (234)

Yes  No  N/A

*\* Residual Contaminant Level*

*\*\*Site Specific Residual Contaminant Level*



December 20, 2013

Mr. James Monroe  
Fox Valley Steel & Wire  
111 N. Douglas St.  
Hortonville, WI 54944

Mr. David Kilpatrick  
Keystone Consolidated Industries, Inc.  
Three Lincoln Centre  
5430 LBJ Freeway, STE. 1740  
Dallas, TX 75240

**KEEP THIS DOCUMENT WITH YOUR PROPERTY RECORDS**

SUBJECT: Final Case Closure with Continuing Obligations  
DNR Site Name: FOX VALLEY STEEL & WIRE, 111 N. Douglas St., Hortonville, WI  
DNR BRRTS Activity #: 02-45-553699  
FID #: 445031620

Dear Mr. Monroe and Mr. Kilpatrick:

The Department of Natural Resources (DNR) considers the Fox Valley Steel & Wire site (specific to metals, including zinc) closed, with continuing obligations. No further investigation or remediation for metals, including zinc, is required at this time. However, you, future property owners, and occupants of the property must comply with the continuing obligations as explained in the conditions of closure in this letter. Please read over this letter closely to ensure that you comply with all conditions and other on-going requirements. Provide this letter and any attachments listed at the end of this letter to anyone who purchases, rents or leases this property from you.

This final closure decision is based on the correspondence and data provided, and is issued under chs. NR 726 and 727, Wis. Adm. Code. The DNR Northeast Region (NER) Closure Committee reviewed the request for closure between December 5, 2013 and December 16, 2013. The Closure Committee reviews environmental remediation cases for compliance with state laws and standards to maintain consistency in the closure of these cases.

This case is specific to the presence of metals, including zinc, in the soil and groundwater located outside the footprint of the facility. The contamination was attributed to the zinc oxide filter cake waste material generated during the process of galvanizing nails at the property and possibly from historical operations. The conditions of closure and continuing obligations required were based on the property being used for industrial purposes and are meant to address any potential exposure to the residual contamination.

In addition, monitoring wells MW-1 through MW-13 are being transferred for continued monitoring as part of the DNR BRRTS Activity # 02-45-560221 with DNR Site Name: KEYSTONE CONSOLIDATED INDUSTRIES INC, for the investigation of volatile organic compounds (VOCs) and polynuclear

aromatic hydrocarbons (PAHs). The property owners of 111 North Douglas Street, Hortonville and N2729 Douglas Road, Town of Hortonville, Outagamie County, Wisconsin, must NOT fill and seal these wells at this time. Well filling and sealing will be required of the KEYSTONE CONSOLIDATED INDUSTRIES INC site for closure, upon conclusion of the cleanup of that site. Monitoring well, MW-11, is located on an adjacent property at N2729 Douglas Road, Town of Hortonville, Outagamie County, Wisconsin. These wells are identified on the **attached map (Figure B.1.b. Detailed Site Map, 2/12)**. Corresponding Wisconsin Unique Well Numbers (WUWN) are identified on the **attached map (Figure B.3.d. Monitoring Wells, 2/12)**.

### Continuing Obligations

The continuing obligations for this site are summarized below. Further details on actions required are found in the section Closure Conditions.

- Groundwater contamination is present above ch. NR 140, Wis. Adm. Code enforcement standards (MW-4, MW-10 at 111 North Douglas Street, Hortonville, and TW-52 at N2729 Douglas Road, Town of Hortonville).
- Residual soil contamination exists at 111 North Douglas Street, Hortonville, that must be properly managed should it be excavated or removed.
- Industrial soil standards were applied for closure, and industrial zoning is required (GP-37) at 111 North Douglas Street, Hortonville. Before the land use may be changed from industrial to non-industrial, additional environmental work must be completed.

The DNR fact sheet, "Continuing Obligations for Environmental Protection", RR-819, helps to explain a property owner's responsibility for continuing obligations on their property. The fact sheet may be obtained at <http://dnr.wi.gov/files/PDF/pubs/rr/RR819.pdf>.

### GIS Registry

This site will be included on the Bureau for Remediation and Redevelopment Tracking System (BRRTS) on the Web at <http://dnr.wi.gov/topic/Brownfields/clean.html>, to provide public notice of residual contamination and of any continuing obligations. The site can also be viewed on the Remediation and Redevelopment Sites Map (RRSM), a map view, under the Geographic Information System (GIS) Registry layer, at the same web address.

DNR approval prior to well construction or reconstruction is required for all sites shown on the GIS Registry, in accordance with s. NR 812.09 (4) (w), Wis. Adm. Code. This requirement applies to private drinking water wells and high capacity wells. To obtain approval, complete and submit Form 3300-254 to the DNR Drinking and Groundwater program's regional water supply specialist. This form can be obtained on-line at <http://dnr.wi.gov/topic/wells/documents/3300254.pdf>.

All site information is also on file at the DNR Northeast Region Headquarters at 2984 Shawano Avenue, Green Bay, Wisconsin, 54313-6727. This letter and information that was submitted with your closure request application, including any maintenance plan and maps, can be found as a PDF in BRRTS on the Web.

### Closure Conditions

Compliance with the requirements of this letter is a responsibility to which the current property owner, and any subsequent property owners must adhere. DNR staff will conduct periodic prearranged inspections to ensure that the conditions included in this letter are met. If these requirements are not

followed, the DNR may take enforcement action under s. 292.11, Wis. Stats. to ensure compliance with the specified requirements, limitations or other conditions related to the property.

Please send written notifications in accordance with the following requirements to:

Department of Natural Resources  
Attn: Remediation and Redevelopment Program Environmental Program Assistant  
2984 Shawano Avenue  
Green Bay, WI 54313-6727

Residual Groundwater Contamination (ch. NR 140, 812, Wis. Adm. Code)

Groundwater contamination greater than enforcement standards is present both on this contaminated property and off this contaminated property, as shown on the **attached map (Fig B.3.b.(2) Approximate Lateral Extent of Zinc Impacted Groundwater in Exceedance of the ES as of October 10, 2012, 2/12)**. If you intend to construct a new well, or reconstruct an existing well, you'll need prior DNR approval. This continuing obligation applies to the properties at 111 North Douglas Street, Hortonville, and N2729 Douglas Road, Town of Hortonville. The affected property owner of N2729 Douglas Road was notified of the presence of groundwater contamination.

Residual Soil Contamination (ch. NR 718, chs. 500 to 536, Wis. Adm. Code or ch. 289, Wis. Stats.)

Soil contamination remains above the groundwater pathway residual contaminant levels (RCLs) at GP-1 and GP-2 (mercury), GP-28, GP-31, GP-33, GP-35, GP-39, GP-40 and GP-50 (selenium), and GP-34 and GP-41 (lead), above the arsenic background threshold value of eight parts per million at GP-15 and GP-41 (arsenic) and above the non-industrial RCL at GP-37 (zinc) as indicated on the **attached map (Figure B.2.c. Pre/Post Remaining Soil Contamination, 2/12)**. If soil in the specific locations described above is excavated in the future, the property owner or right-of-way holder at the time of excavation must sample and analyze the excavated soil to determine if contamination remains. If sampling confirms that contamination is present, the property owner or right-of-way holder at the time of excavation will need to determine whether the material is considered solid or hazardous waste and ensure that any storage, treatment or disposal is in compliance with applicable standards and rules. Contaminated soil may be managed in accordance with ch. NR 718, Wis. Adm. Code, with prior DNR approval.

In addition, all current and future owners and occupants of the property and right-of-way holders need to be aware that excavation of the contaminated soil may pose an inhalation or other direct contact hazard and as a result special precautions may need to be taken to prevent a direct contact health threat to humans. It should also be noted that nails and other scrap metal were observed in the gravel north and west of the facility during the investigation.

Industrial Soil Standards (s. NR 726.15, s. NR 727.07, Wis. Adm. Code)

Zinc soil contamination remains at GP-37, as shown on the **attached map (Figure B.2.c. Pre/Post Remaining Soil Contamination, 2/12)**. Samples contained zinc in concentrations that met the industrial soil standards.

This property may not be used or developed for a residential, commercial, agricultural or other non-industrial use, unless prior written approval has been obtained from the DNR. The property owner shall notify the DNR at least 45 days before changing the land use. An investigation and remedial action to meet applicable soil cleanup standards may be required at that time.

### General Wastewater Permits for Construction Related Dewatering Activities

The DNR's Water Quality Program regulates point source discharges of contaminated water, including discharges to surface waters, storm sewers, pits, or to the ground surface. This includes discharges from construction related dewatering activities, including utility and building construction.

If you or any other person plan to conduct such activities, you or that person must contact that program, and if necessary, apply for the necessary discharge permit. Additional information regarding discharge permits is available at <http://dnr.wi.gov/topic/wastewater/GeneralPermits.html>. If residual soil or groundwater contamination is likely to affect water collected in a pit/trench that requires dewatering, a general permit for Discharge of Contaminated Groundwater from Remedial Action Operations may be needed. If water collecting in a pit/trench that requires dewatering is expected to be free of pollutants other than suspended solids and oil and grease, a general permit for Pit/Trench Dewatering may be needed.

### Chapter NR 140, Wis. Adm. Code Exemption

Recent groundwater monitoring data for this site indicates that for chromium and lead at temporary well, TW-51, located at N2729 Douglas Road, Town of Hortonville, contaminant levels exceed the NR 140 preventive action limit (PAL) but are below the enforcement standard (ES). The DNR may grant an exemption to a PAL for a substance of public health concern, other than nitrate, pursuant to s. NR 140.28 (2) (b), Wis. Adm. Code, if all of the following criteria are met:

1. The measured or anticipated increase in the concentration of the substance will be minimized to the extent technically and economically feasible.
2. Compliance with the PAL is either not technically or economically feasible.
3. The enforcement standard for the substance will not be attained or exceeded at the point of standards application. [Note: at this site the point of standards application is all points where groundwater is monitored.]
4. Any existing or projected increase in the concentration of the substance above the background concentration does not present a threat to public health or welfare.

Based on the information you provided, the DNR believes that these criteria have been or will be met. Therefore, pursuant to s. NR 140.28, Wis. Adm. Code, an exemption to the PAL is granted for chromium and lead at TW-51, located at N2729 Douglas Road, Town of Hortonville, Outagamie County, Wisconsin. Please keep this letter, because it serves as the exemption.

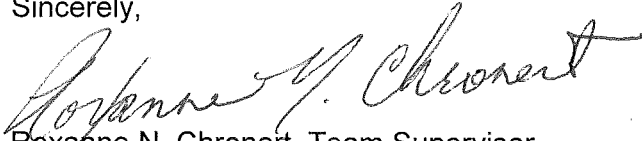
### In Closing

Please be aware that the case may be reopened pursuant to s. NR 727.13, Wis. Adm. Code, for any of the following situations:

- if additional information regarding site conditions indicates that contamination on or from the site poses a threat to public health, safety, or welfare or to the environment,
- if the property owner does not comply with the conditions of closure, with any deed restrictions applied to the property, or with a certificate of completion issued under s. 292.15, Wis. Stats, or
- a property owner fails to maintain or comply with a continuing obligation (imposed under this closure approval letter).

The DNR appreciates your efforts to restore the environment at this site. If you have any questions regarding this closure decision or anything outlined in this letter, please contact Jennifer Borski in Oshkosh at (920) 424-7887.

Sincerely,



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

Attachments:

- Figure B.1.b. Detailed Site Map, 2/12
- Figure B.2.c. Pre/Post Remaining Soil Contamination, 2/12
- Fig B.3.b.(2) Approximate Lateral Extent of Zinc Impacted Groundwater in Exceedance of the ES as of October 10, 2012, 2/12
- Figure B.3.d. Monitoring Wells, 2/12

Copy:

- Rick and Lisa Wirth, N2729 Douglas Road, Hortonville, WI 54944

Electronic copy:

- Tim Anderson, United Engineering Consultants, Inc.
- Bill Phelps, DG/5

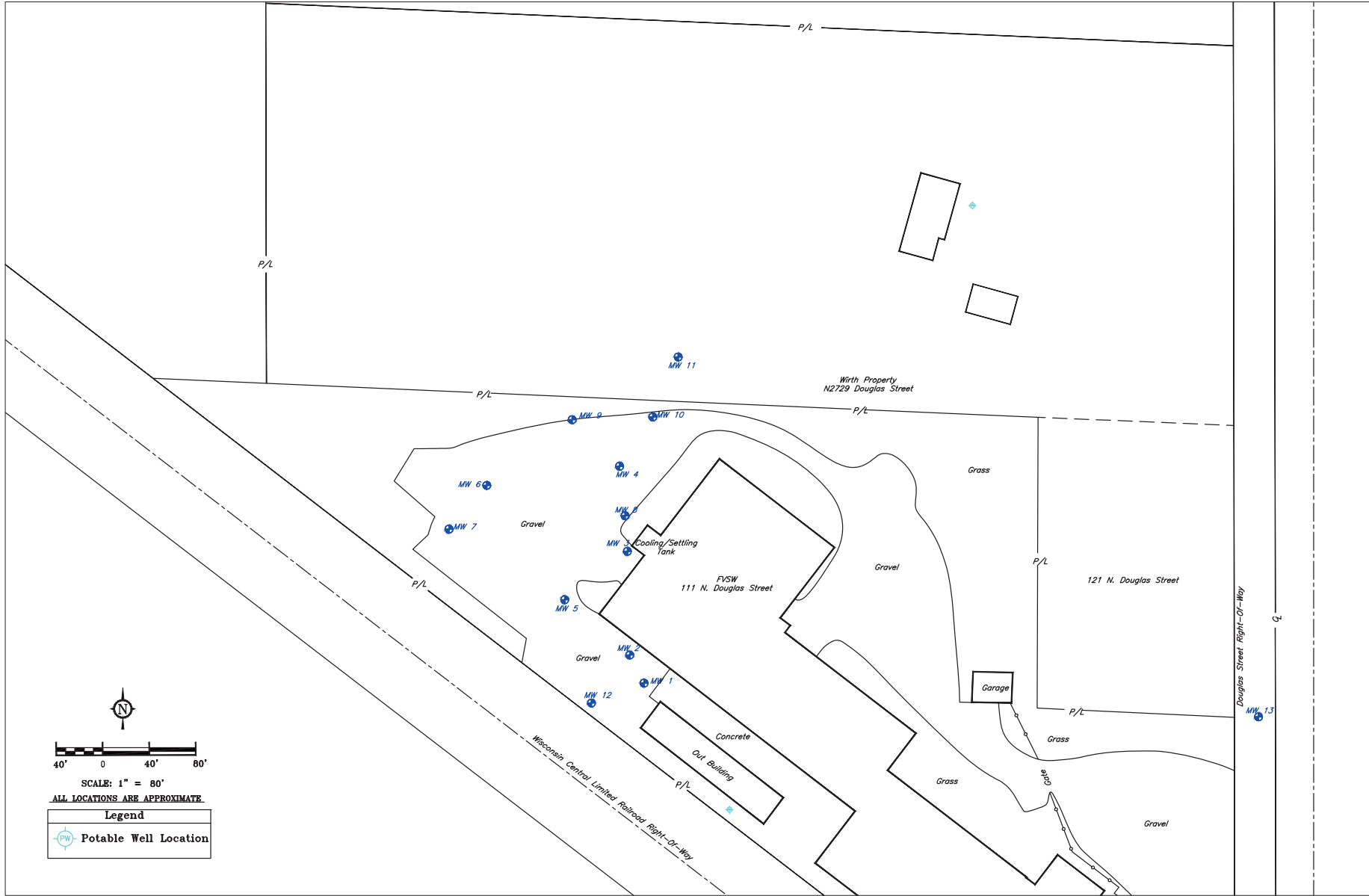


Figure B.1.b. Detailed Site Map



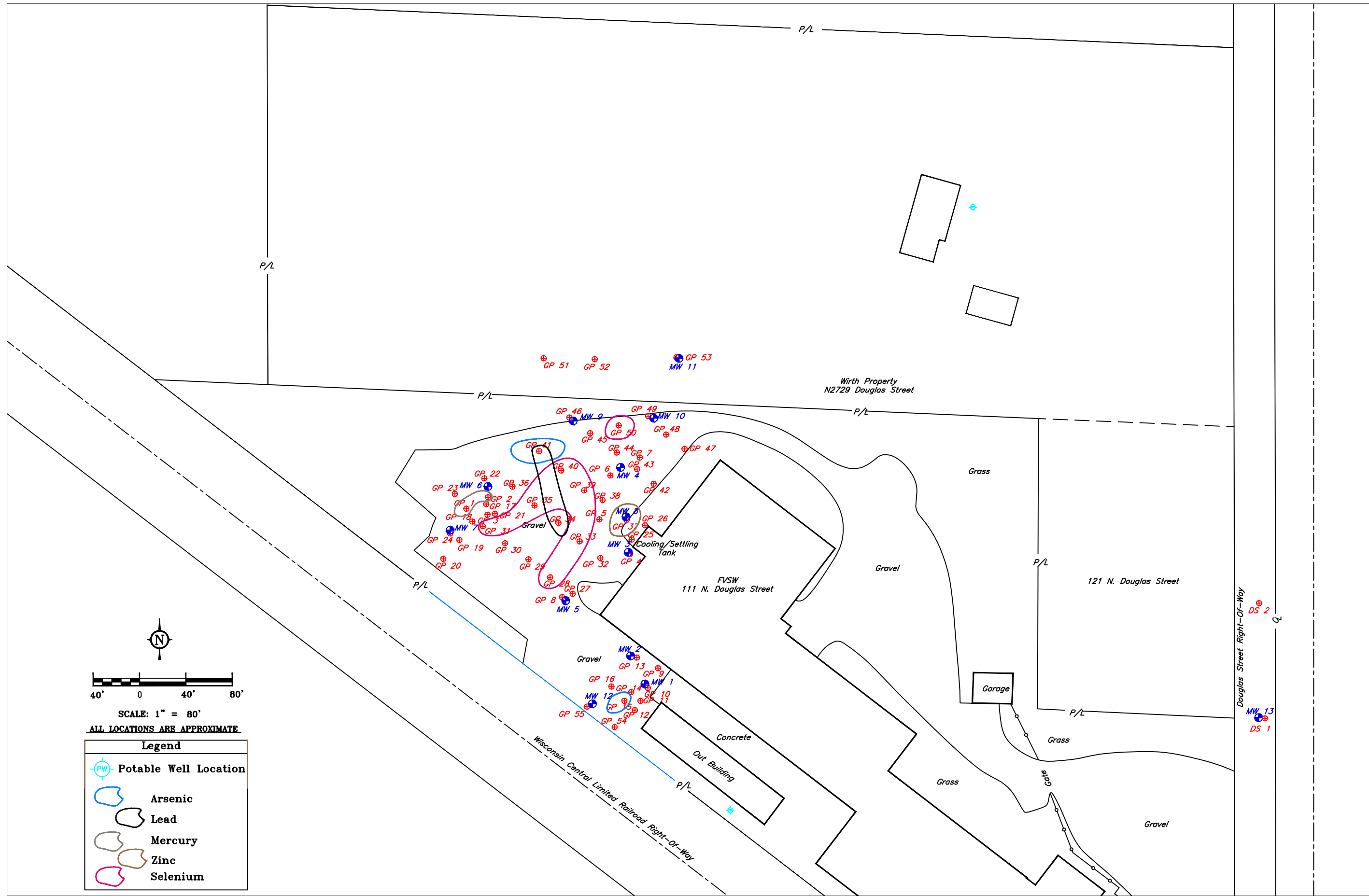
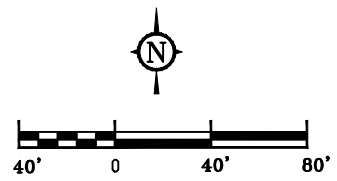
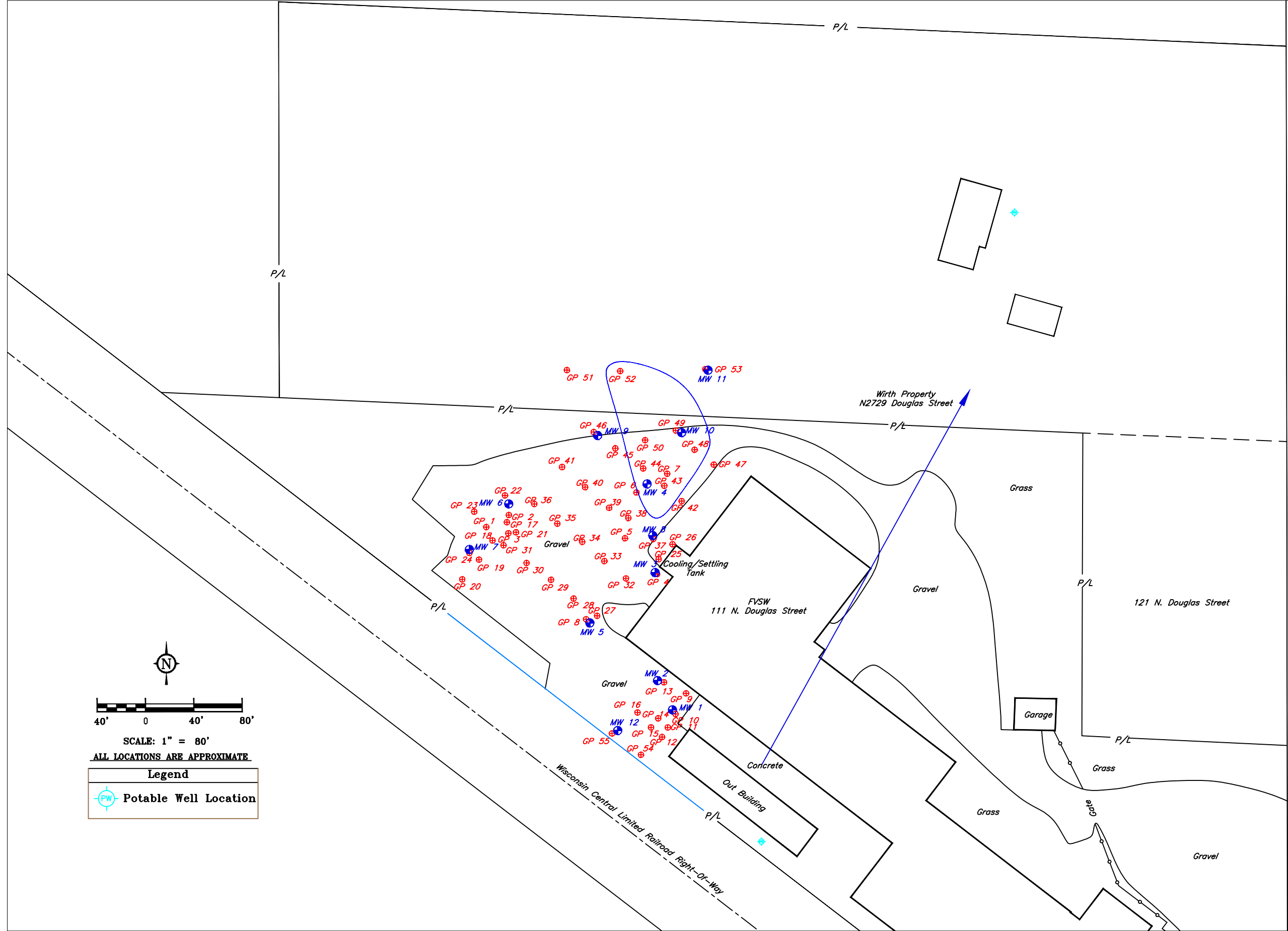


Figure B.2.c. Pre/Post Remaining Soil Contamination





SCALE: 1" = 80'  
 ALL LOCATIONS ARE APPROXIMATE

Legend	
	Potable Well Location

Figure B.3.b.(2) Approximate Lateral Extent of Zinc Impacted Groundwater in Exceedance of the ES as of October 10, 2012

**United Engineering Consultants, Inc.**

16237 W. Ryerson Road  
 New Berlin, WI 53151  
 Tel. (262) 785-1447 • FAX (262) 706-4400

09014
DRAWN BY: MJD
DATE: 2/12
ID#: 09014plot2

Phase II Environmental Site Assessment  
 Fox Valley Steel & Wire  
 111 N. Douglas Street Hortonville WI, 54944

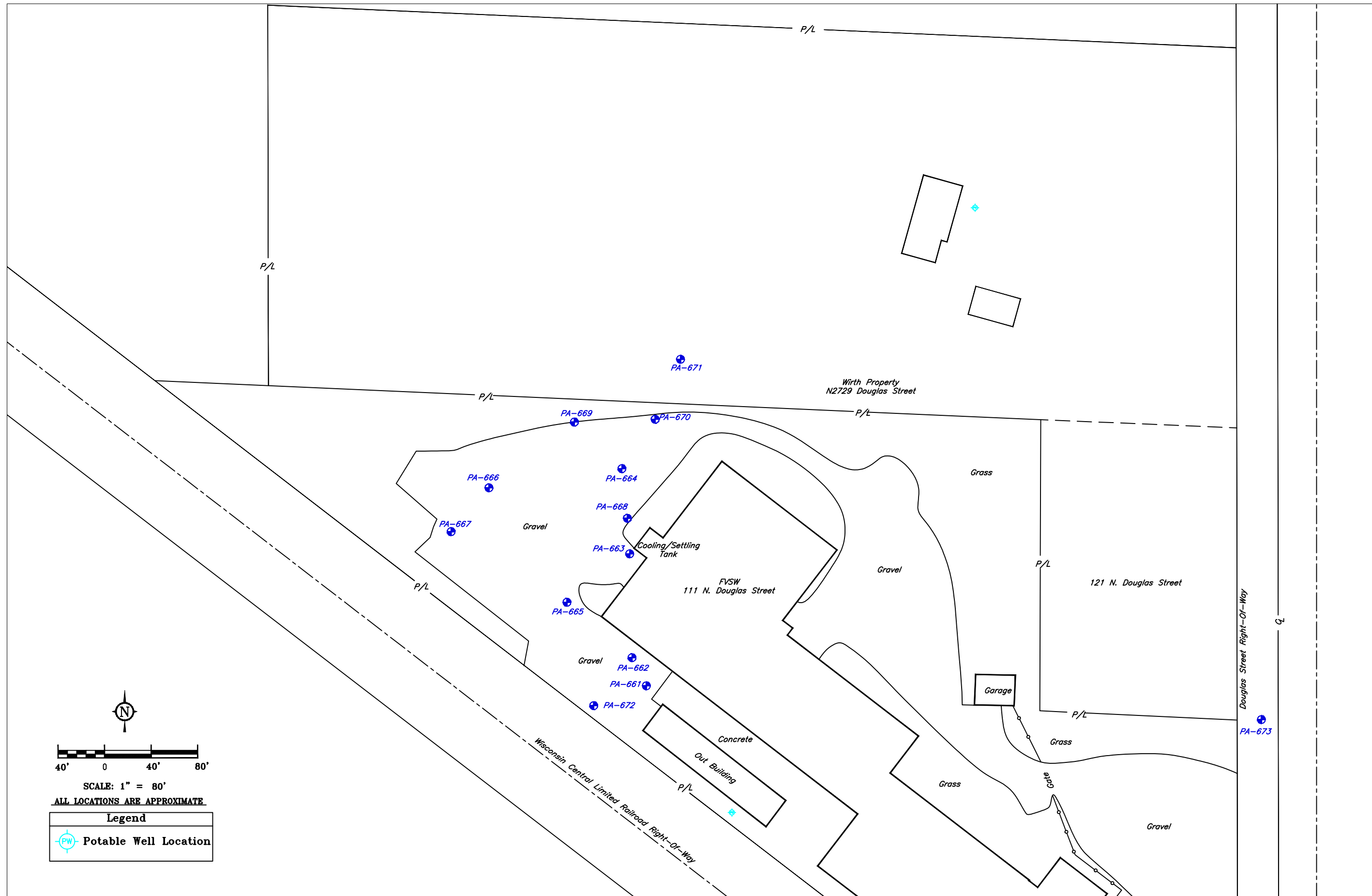


Figure B.3.d. Monitoring Wells

Phase II Environmental Site Assessment  
 Fox Valley Steel & Wire  
 111 N. Douglas Street Hortonville WI, 54944

09014
DRAWN BY: MJD
DATE: 2/12
ID#: 09014plot2

**United Engineers  
 Consultants, Inc.**  
 16237 W. Ryerson Road  
 New Berlin, WI 53151  
 Tel. (262) 785-1447 • FAX (262) 706-4400



December 20, 2013



Rick and Lisa Wirth  
N2729 Douglas Road  
Hortonville, WI 54944

SUBJECT: Continuing Obligations and Property Owner Requirements for N2729 Douglas Road, Town of Hortonville, Outagamie County, Wisconsin  
Parcel Identification Number: 120061504  
Final Case Closure for  
FOX VALLEY STEEL & WIRE, 111 North Douglas Street, Hortonville, Wisconsin  
DNR BRRTS Activity #: 02-45-553699

Dear Mr. and Mrs. Wirth:

The purpose of this letter is to notify you that certain continuing obligations apply to the property at N2729 Douglas Road, Town of Hortonville, Outagamie County, Wisconsin, (referred to in this letter as the "Property") due to contamination remaining on the Property. The continuing obligations are part of the cleanup and case closure approved for the above referenced case, located at 111 North Douglas Street, Hortonville, Outagamie County, Wisconsin. (The case is referenced by the location of the source property, i.e. the property where the original discharge occurred, prior to contamination migrating to the Property.) The continuing obligations that apply to the Property are stated as conditions in the attached closure approval letter, and are consistent with s. 292.12, Wis. Stats., and ch. NR 700, Wis. Adm. Code, rule series. They are meant to limit exposure to any remaining environmental contamination at the Property. These continuing obligations will also apply to future owners of the Property, until the conditions no longer exist at the Property.

In addition, the monitoring wells (MW-1 through MW-13) installed for the FOX VALLEY STEEL & WIRE site are being transferred for continued monitoring as part of the DNR BRRTS Activity # 02-45-560221 with DNR Site Name: KEYSTONE CONSOLIDATED INDUSTRIES INC, for the investigation of volatile organic compounds (VOCs) and polynuclear aromatic hydrocarbons (PAHs). This includes MW-11, located on your Property. Well filling and sealing will be required of the KEYSTONE CONSOLIDATED INDUSTRIES INC site for closure, upon conclusion of the cleanup of that site. The locations of these wells are identified in the attached **December 20, 2013 Final Closure for FOX VALLEY STEEL & WIRE, DNR BRRTS Activity # 02-45-553699.**

It is common for properties with approved cleanups to have continuing obligations as part of cleanup/closure approvals. Information on continuing obligations on properties can be found by using the Bureau for Remediation and Redevelopment Tracking System (BRRTS) on the Web. This database is found at <http://dnr.wi.gov/topic/Brownfields/clean.html>. This page also provides information on how to find further information about the closure and residual contamination, and how to use the map application, RR Sites Map, including the GIS Registry layer, which shows sites closed with residual contamination and continuing obligations.

The Department reviewed and approved the case closure request regarding the contamination in the soil and groundwater at this site, based on the information submitted by Jim Monroe of Fox Valley Steel

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& Wire, and Tim Anderson of United Engineering Consultants, Inc. The metals contamination was attributed to the zinc oxide filter cake waste material generated during the process of galvanizing nails at the property and possibly from historical operations. As required by state law, you received notification about the requested closure from the person conducting the cleanup. No further investigation or cleanup is required at this time. However, the closure decision is conditioned on the long-term compliance with certain continuing obligations, as described below.

#### Continuing Obligations Applicable to Your Property

A number of continuing obligations are described in the attached case closure letter to Mr. James Monroe of Fox Valley Steel and Wire and Mr. David Kilpatrick of Keystone Consolidated Industries, Inc., dated December 20, 2013. However, only the following continuing obligation applies to your Property:

- Residual groundwater contamination (temporary well, TW-52)

#### GIS Registry – Well Construction Approval Needed

Because of the residual groundwater contamination and the continuing obligations, this site, which includes your Property, will be listed on the Bureau for Remediation and Redevelopment Tracking System (BRRTS) on the Web, at <http://dnr.wi.gov/topic/Brownfields/clean.html>. If you intend to construct or reconstruct a well on the Property, you will need to get Department approval in accordance with s. NR 812.09 (4) (w), Wis. Adm. Code. To obtain approval, Form 3300-254 needs to be completed and submitted to the DNR Drinking and Groundwater program's regional water supply specialist. A well driller can help with this form. This form can be obtained on-line <http://dnr.wi.gov/org/water/dwg/forms/3300254.pdf>. If at some time, all these continuing obligations are fulfilled, and the remaining contamination is either removed or meets applicable standards, you may request the removal of the Property from the GIS Registry.

#### Property Owner Responsibilities

The owner (you and any subsequent property owner) of this Property is responsible for compliance with these continuing obligations, pursuant to s. 292.12, Wis. Stats. You are required to pass on the information about these continuing obligations to anyone who purchases this property from you (i.e. pass on this letter), in accordance with s. NR 727.05. For residential property transactions, you are required to make disclosures under s. 709.02, Wis. Stats. You may have additional obligations to notify buyers of the condition of the property and the continuing obligations set out in this letter and the closure letter.

If you lease or rent the property to an occupant who will be responsible for maintaining a continuing obligation, you will need to include that responsibility in a lease agreement, in accordance with s. NR 727.05, Wis. Adm. Code.

Please be aware that failure to comply with the continuing obligations may result in enforcement action by the Department. The Department intends to conduct inspections in the future to ensure that the conditions included in this letter are met.

These responsibilities are the property owner's. A property owner may enter into a legally binding agreement (such as a contract) with someone else (the person responsible for the cleanup) to take responsibility for compliance with the continuing obligations. If the person with whom any property

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owner has an agreement fails to adequately comply with the appropriate continuing obligations, the Department has the authority to require the property owner to complete the necessary work.

A legal agreement between you and another party to carry out any of the continuing obligations listed in this letter does not automatically transfer to a new owner of the property. If a subsequent property owner cannot negotiate a new agreement, the responsibility for compliance with the applicable continuing obligations resides with that Property owner.

When maintenance of a continuing obligation is required, the Property owner is responsible for inspections, repairs, or replacements as needed. Such actions should be documented by the Property owner and the records kept accessible for the Department to review for as long as the Department directs.

You and any subsequent Property owners are responsible for notifying the Department at least 45 days before making a change to a continuing obligation, and obtaining approval, before making any changes to the property that would affect the obligations applied to the Property. Please send written notifications in accordance with the following requirements to:

Department of Natural Resources  
Attn: Remediation and Redevelopment Program Environmental Program Assistant  
2984 Shawano Avenue  
Green Bay, WI 54313-6727

DNR fact sheet, RR-819, "Continuing Obligations for Environmental Protection" helps explain a property owner's responsibility for continuing obligations on their property. This fact sheet should have been sent to you when you received a notification letter before the closure request was submitted to the DNR. You may obtain a copy at <http://dnr.wi.gov/files/PDF/pubs/rr/RR819.pdf>.

Under s. 292.13, Wis. Stats., owners of properties affected by contamination from another property are generally exempt from investigating or cleaning up a hazardous substance discharge that has migrated onto a property from another property, through the soil, groundwater or sediment pathway. However, the exemption under s. 292.13, Wis. Stats., does not exempt the property owner from the responsibility to maintain a continuing obligation placed on the property in accordance with s. 292.12, Wis. Stats. To maintain this exemption, that statute requires the current property owner and any subsequent property owners, to meet the conditions in the statute, including:

- Granting reasonable access to DNR or responsible party, or their contractors;
- Avoiding interference with response actions taken; and
- Avoiding actions that make the contamination worse (e.g., demolishing a structure and causing or worsening the discharges to the environment).

The Department appreciates your efforts. If you have any questions regarding this closure decision or anything outlined in this letter, please contact Jennifer Borski in Oshkosh at (920) 424-7887.

Sincerely,



Roxanne N. Chronert  
Northeast Remediation & Redevelopment Team Supervisor

December 20, 2013

Continuing Obligations and Property Owner Requirements for  
N2729 Douglas Road, Town of Hortonville, WI  
Parcel Identification Number: 120061504  
Final Case Closure for FOX VALLEY STEEL & WIRE, 111 N Douglas St, Hortonville, WI  
DNR BRRTS Activity #: 02-45-553699

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PROPERTY

Attachment:

- December 20, 2013 Final Closure for FOX VALLEY STEEL & WIRE, DNR BRRTS Activity # 02-45-553699

Copy:

- Jim Monroe, Fox Valley Steel & Wire, 111 N. Douglas St., Hortonville, WI 54944
- David Kilpatrick, Keystone Consolidated Industries, Inc., Three Lincoln Centre, 5430 LBJ Freeway, STE. 1740, Dallas, TX 75240
- File: WDNR BRRTS #02-45-560221, KEYSTONE CONSOLIDATED INDUSTRIES

Electronic Copy:

- Tim Anderson, United Engineering Consultants, Inc.

Enclosure:

- RR 819 – Continuing Obligations Fact Sheet

**SUBMIT AS UNBOUND PACKAGE IN THE ORDER SHOWN**

**Notice:** Pursuant to ch. 292, Wis. Stats., and chs. NR 726 and 746, Wis. Adm. Code, this form is required to be completed for case closure requests. The closure of a case means that the Department of Natural Resources (DNR) has determined that no further response is required at that time based on the information that has been submitted to the DNR. All sections of this form must be completed unless otherwise directed by the Department. Incomplete forms will be considered "administratively incomplete" and processing of the request will stop until required information is provided. Any section of the form not relevant to the case closure request must be fully filled out or explained on a separate page and attached to the relevant section of this form. DNR will consider your request administratively complete when the form and all sections are completed, all attachments are included, and the applicable fees required under ch. NR 749, Wis. Adm. Code, are included, and sent to the proper destinations. Personal information collected will be used for administrative purposes and may be provided to requesters to the extent required by Wisconsin's Open Records Law (ss. 19.31 - 19.39, Wis. Stats.).

**Site Information**

BRRTS No. 02-45-553699		Parcel ID No. 240 031100	
BRRTS Activity (Site) Name Fox Valley Steel & Wire		WTM Coordinates X 627452 Y 430245	
Street Address 111 N. Douglas Street		City Hortonville	State ZIP Code WI 54944
Responsible Party (RP) Name James Monroe			
Company Name Fox Valley Steel & Wire			
Street Address 111 N. Douglas Street		City Hortonville	State ZIP Code WI 54944
Phone Number (920) 779-4544		Email	

Check here if the RP is the owner of the source property.

Environmental Consultant Name Timothy J. Anderson			
Consulting Firm United Engineering Consultants, Inc.			
Street Address 16237 W. Ryerson Road		City New Berlin	State ZIP Code WI 53151
Phone Number (262) 785-1447		Email tauec@sbcglobal.net	
Acres Ready For Use 6.64		Voluntary Party Liability Exemption Site? <input type="radio"/> Yes <input checked="" type="radio"/> No	

**Fees and Mailing of Closure Request**

*If any section is not relevant to the case closure request, you must fully explain the reasons why and attach that explanation to the relevant section of the form. All information submitted shall be legible. Providing illegible information may result in a submittal being considered incomplete until corrected.*

1. **Send a copy of page one** of this form and the applicable ch. NR 749, Wis. Adm. Code, fee(s) to the DNR regional Environmental Program Associate at <http://dnr.wi.gov/topic/Brownfields/Contact.html>. Check all fees that apply:

- \$750 Closure Fee  \$200 GIS Registry Fee for Soil  
 \$250 GIS Registry Fee for Groundwater Lost Well(s) Total Amount of Payment \$ \$1,200.00

2. **Send one paper copy and one e-copy on compact disk of the entire closure package** to the Regional Project Manager assigned to your site. Submit as unbound, separate documents in the order and with the titles prescribed by this form. For electronic document submittal requirements, see <http://dnr.wi.gov/files/PDF/pubs/rr/RR690.pdf>.



## Site Summary

If any section is not relevant to the case closure request, you must fully explain the reasons why and attach that explanation to the relevant section of the form. All information submitted shall be legible. Providing illegible information may result in a submittal being considered incomplete until corrected.

### 1. General Site Information and Site History

- A. **Site Location:** Describe the physical location of the site, both generally and specific to its immediate surroundings.  
The subject property is located at 111 N. Douglas Street in the Village of Hortonville, Wisconsin 54944. Cadastrally, the site is located within the NW 1/4 of the SW 1/4 of Section 35, Township 22 North, Range 15 East of Outagamie County. The parcel is the northwest corner of STH 15 and N. Douglas Street.
- B. **Prior and current site usage:** Specifically describe the current and historic occupancy and types of use.  
The property has been occupied by manufacturers of various steel and wire products including hand driven nails. A portion of the nail production has been galvanized to provide rust protection. The current owner, Keystone Consolidated Industries Inc. (Keystone), purchased the parcel in 1986. Keystone installed the galvanizing process in 1987 and operated it until 2001. At that time, the equipment and operations were purchased by FVSW. FVSW operated the galvanizing process from 2001 to 2009. In 2010, all components involved with the galvanizing process were properly cleaned and the galvanizing operations were discontinued. FVSW currently produces non-galvanized nails and other wire products at the site.
- C. Describe how and when site contamination was discovered.  
Zinc impacted soil and groundwater was encountered during a Phase II Environmental Site Assessment performed by United Engineering Consultants Inc. on December 31, 2009.
- D. Describe the type(s) and source(s) or suspected source(s) of contamination.  
Total Cyanide, Cyanide amenable to chlorination, RCRA Metals, Tin and Zinc impacted soil and/or groundwater from overflow events of the concrete cooling tank, the exterior storage of Zinc Oxide filter cake and the alleged use of Zinc Oxide filter cake to maintain the existing grade of the gravel driveways.
- E. Other relevant site description information (or enter Not Applicable).  
Not Applicable
- F. List BRRTS activity site name and number for all other BRRTS activities at this property, including closed cases.  
Fox Valley Steel & Wire 02-45-553699 Open ERP case for RCRA Metals. Keystone Consolidated Industries Inc. 02-45-560221- Open ERP case for Volatile Organic Compounds (VOC) and Polynuclear Aromatic Hydrocarbons (PAH).
- G. List BRRTS activity/site name(s) and number(s) for all properties immediately adjacent to this site, and those impacted by contamination from this site.  
American Toy & Furniture - LGU 02-45-000563 Closed ERP site with VPLE. American Toy & Furniture - Site 2 Closed LUST site 03-45-245541. Site is located immediately south-southwest of the subject property.
- H. **Current zoning** (e.g. industrial, commercial, residential) for the site and for neighboring properties, and how verified (Provide documentation in Attachment G).  
111 N. Douglas Street - Industrial zoning. N2729 Douglas Street - Residential zoning.

### 2. General Site Conditions

- A. Soil/Geology
- Describe soil type(s) and relevant physical properties, thickness of soil column across the site, vertical and lateral variations in soil types.  
Surface of the site is generally covered with two (2) to twenty (20) inches of gravel or sand and gravel underlain by dark brown to brown fine to medium sand to approximate depths of four and one-half (4 1/2) and at least the termination depth (eight (8) feet) at several borehole locations. The sand is underlain by reddish brown silty clay with varying amounts of sand to at least the termination depth (eight (8) feet) of the other boreholes.
  - Describe the composition, location and lateral extent, and depth of fill or waste deposits on the site.  
Surface of the site at 111 N. Douglas Street is covered with two (2) to twenty (20) inches of gravel, sandy clay or sand and gravel fill. No fill was encountered at N2729 Douglas Street.
  - Depth to bedrock, bedrock type, and whether or not it was encountered during the investigation.  
Bedrock was not encountered during the investigation. The uppermost bedrock unit below the subject property is believed to be the Cambrian age Cambrian-Sandstone formation which is predominantly sandstone. Underlying this formation is the Pre-Cambrian crystalline rock. The depth to bedrock is estimated to be seventy (70) to one hundred forty (140) feet.
  - Describe the nature and locations of current surface cover(s) across the site (e.g. natural vegetation, landscaped areas, gravel, hard surfaces, and buildings).  
The surface of the 111 N. Douglas Street property is currently covered with a single story structure approximately seventy three thousand two hundred (73,200) square feet in plan dimension. An out building, about three thousand five

hundred (3500) square feet in plan dimension is located immediately west of the main site structure. These buildings have concrete floors. A garage is located east of the main building and is approximately nine hundred (900) feet square feet in plan dimension. The remainder of the surface of the property is covered with asphaltic concrete, concrete, gravel and landscaped areas. Topsoil is present at N2729 Douglas Street in the investigated area.

#### B. Groundwater

- i. **Discuss depth to groundwater and piezometric elevations.** Describe and explain depth variations, and whether free product affects measurement or water table elevation. Describe the stratigraphic unit(s) where water table was found or which were measured for piezometric levels.

Groundwater elevation measurements recorded during several groundwater sampling events indicate the depth to groundwater generally ranges from approximately four (4) to seven (7) feet. The groundwater is located in the fine to medium sand stratum. No free product was encountered.

- ii. Discuss groundwater flow direction(s), shallow and deep. Describe and explain flow variations, including fracture flow if present.

A north-northeasterly shallow groundwater flow direction was measured during the sampling events. Based on the elevation of Black Otter Lake, it is anticipated the shallow unconfined water table is approximately fifteen (15) to twenty (20) feet below the existing grade. The groundwater flow direction is expected to be to the northeast toward Black Otter Creek.

- iii. Discuss groundwater flow characteristics: hydraulic conductivity, flow rate and permeability, or state why this information was not obtained.

The hydraulic conductivity of the granular soils is estimated to be 0.001 cm/second or greater. The hydraulic conductivity of the cohesive soils is estimated to be 0.000001 cm/second.

- iv. Identify and describe locations/distance of potable and/or municipal Wells within 1200 feet of the site.

The former potable well at the 111 N. Douglas Street property is located immediately adjacent to the southern corner of the out building. The potable well for the N2729 Douglas Street residence is located approximately two hundred fifty (250) feet north of the northernmost corner of the main site building.

### 3. Site Investigation Summary

#### A. General

- i. Provide a brief summary of the site investigation history. Reference previous submittals by name and date. Describe site investigation activities undertaken since the last submittal for this project and attach the appropriate documentation in Attachment C, if not previously provided.

Initial Phase II Site Investigation dated December 31, 2009 included the advancement of eight (8) soil borings and the installation of five (5) temporary groundwater monitoring wells. Groundwater and soil samples analyzed for the presence of total Cyanide, amenable Cyanide, RCRA Metals, Tin, Zinc and VOC. Since the initial submittal, forty nine (49) soil borings were advanced and four (4) temporary and thirteen (13) NR 141 compliant groundwater monitoring wells were installed. The collected soil and groundwater samples were analyzed for the presence of total Cyanide, amenable Cyanide, RCRA Metals, Tin, Zinc, DRO, VOC and PAH. The results of the VOC, PAH and DRO analysis were transferred to BRRTS #02-45-560221.

- ii. Identify whether contamination extends beyond the source property boundary, describe the off-site media (e.g., soil, groundwater, etc.) impacted, and the vertical and horizontal extent of off-site impacts.

Zinc impacted shallow groundwater at concentrations above the ES extends from an area on the subject property north of the cooling tank to the northwest to the adjacent residential parcel. Zinc impacted soil at a concentration above its Non-Industrial Direct Contact RCL is present north of the cooling tank.

- iii. Identify any structural impediments to the completion of site investigation and/or remediation and whether these impediments are on the source property or off the source property. Identify the type and location of any structural impediment (e.g., structure) that also serves as the performance standard barrier for protection of the direct contact or the groundwater pathway.

Not Applicable

#### B. Soil

- i. Describe degree and extent of **soil contamination** at and from this site. Relate this to known or suspected sources and known or potential receptors/migration pathways.

Total Cyanide and Cyanide amenable to chlorination are only present in the soils immediately adjacent to the cooling tank. However, only the 0.22 mg/kg concentration at the five (5) to five and one-half (5 1/2) foot interval at GP-25 is not "J" flagged. A "J" flag indicates the compound is present between the detection limit and quantitation limit. Its presence is statistically derived with increased uncertainty of the reported value. Total Cyanide and Cyanide amenable to chlorination are not present at the other sampled locations at or above their respective detection limits.

Zinc, Tin and RCRA Metal impacted soil is present throughout the investigated area. Zinc is present north of the cooling tank at a concentration of 40300 mg/kg which is above its Non-Industrial Direct Contact RCL of 23500 mg/kg.

With the exception of two (2) Arsenic concentrations, no other RCRA metals as well as Tin are present at concentrations in excess of their respective Industrial and Non-Industrial Direct Contact RCL in the upper four (4) feet. Based on the absence of Arsenic at the other fifty five (55) locations in exceedance of the WDNR background Arsenic concentration of 8.0 mg/kg, the above referenced Arsenic concentrations should be considered anomalies or De minimus. The suspected source of the Zinc and Tin impacts is the former cooling tank via overflow events. The other compounds are most likely due to historical operations at 111 N. Douglas Street. The migration pathway was overland and the shallow groundwater table which flows to the north-northeast. The overland pathway is no longer applicable due to the suspension of galvanizing operations at the facility.

- ii. Describe the level and types of **soil contaminants** found in the upper four feet of the soil column.  
See above
- iii. Identify the ch. NR 720, Wis. Adm. Code, method used to establish the soil cleanup standards for this site: for example, a Residual Contaminant Level (RCL), a Site-Specific Residual Contaminant Level (SSRCL), or a Performance Standard as determined under ss NR 720.09, 720.11 and 720.19, Wis. Adm. Code. Identify the land use classification that was used to establish cleanup standards. Provide a copy of the supporting calculations/information in Attachment C.  
Proposed Industrial and Non-Industrial Direct Contact and Groundwater Pathway RCLs proposed by the WDNR in December of 2012.

#### C. Groundwater

- i. Describe degree and extent of groundwater contamination at or from this site. Relate this to known or suspected sources and known or potential receptors/migration pathways. Specifically address any potential or existing impacts to water supply wells or interception with building foundation drain systems.  
Zinc impacted groundwater is present at concentrations in excess of its ES north of the former cooling tank and extending to the northwest onto the adjacent residential property. The suspected source is overflow events from the former exterior cooling tank. The migration pathway was overland and the shallow groundwater which flows to the north-northeast. These pathways are no longer applicable due to the suspension of galvanizing operations at the facility. The former potable well at 111 N. Douglas Street and the potable well at N2729 Douglas Street are not impacted with Zinc at or near its PAL.
- ii. Describe the presence of free product at the site, including the thickness, depth, and locations.  
Free product was not encountered during the site investigation.

#### D. Vapor

- i. Describe how the vapor migration pathway was assessed, including locations where vapor or indoor air samples were collected. If the vapor pathway was not assessed, explain reasons why.  
Vapor migration pathway was not assessed. Vapor migration will be assessed during the investigation for BRRTS # 02-45-560221.
- ii. Identify the applicable DNR action levels and the land use classification used to establish them. Describe where the DNR action levels were reached or exceeded (e.g., sub slab, indoor air or both).  
Not Applicable

#### E. Surface Water and Sediment

- i. Identify whether surface water and/or sediment was assessed and describe the impacts found. If this pathway was not assessed, explain why.  
Surface water and/or sediment was not assessed due to the absence of Zinc impacted groundwater in the northernmost monitoring well at concentrations in excess of its PAL. This well is located several hundred south of Black Otter Creek.
- ii. Identify any surface water and/or sediment action levels used to assess the impacts for this pathway and how these were derived. Describe where the DNR action levels were reached or exceeded.  
Not Applicable

### 4. Remedial Actions Implemented and Residual Levels at Closure

- A. General: Provide a brief summary of the remedial action history. List previous remedial action report submittals by name and date. Identify remedial actions undertaken since the last submittal for this project and provide the appropriate documentation in Attachment C.  
No active remedial action was performed at the subject property.
- B. Describe any immediate or interim actions taken at the site under ch NR 708, Wis. Adm. Code.  
No immediate or interim actions were taken at the site under chapter NR 708.

- C. Describe the *active* remedial actions taken at the site, including: type of remedial system(s) used for each media impacted; the size and location of any excavation or in-situ treatment; the effectiveness of the systems to address the contaminated media and substances; operational history of the systems; and summarize the performance of the active remedial actions. Provide any system performance documentation in Attachment A.7.
- No active remedial actions taken at the site.
- D. Provide a discussion of the nature, degree and extent of residual contamination that will remain at the site or on off-site affected properties after case closure.
- Residual contamination consisting of Zinc impacted shallow groundwater at concentrations in excess of its ES remains north of the former cooling tank and extends to the northwest to the adjacent residential property. Zinc impacted soil at a concentration in excess of its Non-Industrial Direct Contact RCL north of the cooling tank.
- E. Describe the remaining soil contamination within four feet of ground surface (direct contact zone) that attains or exceeds the ch. NR720, Wis. Adm. Code, standard(s) for direct contact.
- No industrial Direct Contact RCL exceedances in the upper four (4) feet with the exception of the previously discussed De minimus Arsenic concentrations. Zinc impacted soil at a concentration of 40300 mg/kg north of the cooling tank which exceeds its Non-Industrial Direct Contact RCL of 23500 mg/kg.
- F. Describe the remaining soil contamination in the vadose zone that attains or exceeds the soil standard(s) for the groundwater pathway.
- Barium, Lead, Mercury and Selenium are present at several locations in exceedance of their respective Groundwater Pathway RCLs. These compounds were analyzed in the groundwater and did not exceed their respective ES with the exception of apparent anomalies or De minimus Barium and Mercury concentrations.
- G. Describe how the residual contamination will be addressed, including but not limited to details concerning: covers, engineering controls or other barrier features; use of natural attenuation of groundwater; and vapor mitigation systems or measures.
- Natural attenuation of the Zinc impacted groundwater by dispersion will reduce the Zinc concentrations below the ES in a reasonable period of time. Zoning will remain industrial on the FVSW property with the documented Non-Industrial Direct Contact RCL exceedance
- H. If using natural attenuation as a groundwater remedy, describe how the data collected supports the conclusion that natural attenuation is effective in reducing contaminant mass and concentration, (e.g. stable or receding groundwater plume).
- Zinc contaminant plume is receding and natural attenuation by dispersion is occurring.
- I. Identify how all exposure pathways were removed and/or adequately addressed by immediate and/or remedial action(s) described above in paragraphs, B, C, D, E and F.
- Not Applicable
- J. Identify any system hardware anticipated to be left in place after site closure, and explain the reasons why it will remain.
- None
- K. Identify the need for a ch. NR 140, Wis. Adm. Code, groundwater Preventive Action Limit (PAL) or Enforcement Standard (ES) exemption, and identify the affected monitoring points and applicable substances.
- Arsenic, Barium, Cadmium, Chromium and Lead were present at MW-4, 5, 8 and 10 as well as TW-1, 2, 6, 7, 51, 54 and 55 during several sampling events at concentrations above their respective PALs. Based on their absence at concentrations above their respective ES, PAL exemptions per NR 140 are requested.
- L. If a DNR action level for vapor intrusion was exceeded (for indoor air, sub slab, or both) describe where it was exceeded and how the pathway was addressed.
- Not Applicable
- M. Describe the surface water and/or sediment contaminant concentrations and areas after remediation. If a DNR action level was exceeded, describe where it was exceeded and how the pathway was addressed.
- Not Applicable

**5. Continuing Obligations: Situations where a maintenance plan(s) and inclusion on DNR's GIS Registry are required.**

Directions: Check all that apply to this case closure request:

	This scenario Applies to this Case Closure		Case Closure Scenario: Maintenance Plans and GIS Registry	Maintenance Plan (s) Required in Attachment D	GIS Registry Listing
	A. On-Site	B. Off-Site			
i.	<input type="checkbox"/>	<input type="checkbox"/>	Engineering Control/Barrier for Direct Contact	✓	✓
ii.	<input type="checkbox"/>	<input type="checkbox"/>	Engineering Control/Barrier for Groundwater Infiltration	✓	✓
iii.	<input type="checkbox"/>	<input type="checkbox"/>	Vapor Mitigation - post closure passive system	✓	✓
iv.	<input type="checkbox"/>	<input type="checkbox"/>	Vapor Mitigation - post closure active system	✓	✓
v.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	None of the above scenarios apply to this case closure	NA	NA

**6. Continuing Obligations: Situations where inclusion on DNR's GIS Registry is required.**

Directions: Check all that apply to this case closure request:

	This scenario Applies to this Case Closure		Case Closure Scenario: GIS Registry Only	GIS Registry Listing
	A. On-Site	B. Off-Site		
i.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Residual soil contamination exceeds ch. NR 720 generic or site-specific RCLs	✓
ii.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Sites with groundwater contamination equal to or greater than the ch. NR 140, enforcement standards (ES)	✓
iii.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Monitoring wells: lost, transferred or remaining in use	✓
iv.	<input type="checkbox"/>	<input type="checkbox"/>	Structural Impediment (not as a performance standard)	✓
v.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Residual soil contamination remaining at ch. NR 720 Industrial Use levels	✓
vi.	<input type="checkbox"/>	<input type="checkbox"/>	Vapor intrusion may be future, post-closure issue if building use or land use changes	✓
vii.	<input type="checkbox"/>	<input type="checkbox"/>	None of the above scenarios apply to this case closure	NA

**7. Underground Storage Tanks**

- A. Were any tanks, piping or other associated tank system components removed as part of the investigation or remedial action?  Yes  No
- B. Do any upgraded tanks meeting the requirements of ch. SPS 310, Wis. Adm. Code, exist on the property?  Yes  No
- C. If the answer to question 7b is yes, is the leak detection system currently being monitored?  Yes  No

**Data Tables (Attachment A)**

If any section is not relevant to the case closure request, you must fully explain the reasons why and attach that explanation to the relevant section of the form. All information submitted shall be legible. Providing illegible information may result in a submittal being considered incomplete until corrected.

**General directions for Data Tables:**

- Use bold and italics font on information of importance on tables and figures. Use **bold font** for ch. NR 140, Wis. Adm. Code, groundwater enforcement standard (ES) attainments or exceedances, and *italicized font* for ch. NR 140, Wis. Adm. Code, groundwater preventive action limit (PAL) standard attainments or exceedances.
- Do not use shading or highlighting on the analytical tables.
- Include on Data Tables the level of detection for results which are below the detection level (i.e. do not just list as no detect (ND)).
- Include the units on data tables.

- Summaries of all data must include information collected by previous consultants.
- Do not submit lab data sheets unless these have not been submitted in a previous report. Tabulate all data required in s. NR 716.15(2)(g)3, Wis. Adm. Code, in the format required in s. NR 716.15(2)(h)3, Wis. Adm. Code.
- Include in Attachment A all of the following tables, in the order prescribed below, with the specific Closure Form titles noted on the separate attachments (e.g., Title: A.1. Groundwater Analytical Table; A.2. Pre-remedial Soil Analytical Table, etc).
- For required documents, each table (e.g., A.1., A.2., etc.) should be a separate PDF.

#### A. Data Tables

- A.1. **Groundwater Analytical Table(s):** Table(s) showing the analytical results and collection dates, for all groundwater sampling points e.g. monitoring wells, temporary wells, sumps, extraction wells, any potable wells and any other wells, extraction wells and any potable wells for which samples have been collected.
- A.2. **Pre-remedial Soil Analytical Table(s):** Table(s) showing the soil analytical results and collection dates - prior to conducting the interim and/or remedial action. Indicate if sample was collected above or below the all-time low water table (unsaturated verses saturated).
- A.3. **Post-remedial Soil Analytical Table(s):** Table(s) showing the post-remedial action soil analytical results and collection dates. Indicate if sample was collected above or below the all-time low water table (unsaturated verses saturated).
- A.4. **Pre and Post Remaining Soil Contamination Soil Analytical Table(s):** Table(s) showing only the pre and post remedial action soil analytical results that exceed a Residual Contaminate Level (RCL) or a Site-Specific Residual Level (SSRCL).
- A.5. **Vapor Analytical Table:** Table(s) showing type(s) of samples, sample collection methods, analytical method, sample results, date of sample collection, time period for sample collection, method and results of leak detection, and date, method and results of communication testing.
- A.6. **Other Media of Concern (e.g., sediment or surface water):** Table(s) showing type(s) of sample, sample collection method, analytical method, sample results, date of sample collection, time period for sample collection, method and results sampling.
- A.7. **Water Level Elevations:** Table(s) showing all water level elevation measurements and dates from all monitoring wells. If present, free product should be noted on the table.
- A.8. **Other:** This attachment should include: 1) any available tabulated natural attenuation data; 2) data tables pertaining to engineered remedial systems that document operational history, demonstrate system performance and effectiveness, and display emissions data; and (3) any other data tables relevant to case closure not otherwise noted above. If this section is not applicable, please explain the reasons why.

#### Maps and Figures (Attachment B)

*If any section is not relevant to the case closure request, you must fully explain the reasons why and attach that explanation to the relevant section of the form. All information submitted shall be legible. Providing illegible information may result in a submittal being considered incomplete until corrected.*

#### General Directions for all Maps and Figures:

- If any map or figure is not relevant to the case closure request, you must fully explain the reason(s) why and attach that explanation (properly labeled with the map/ figure title) in Attachment B.
- Provide on paper no larger than 11 x 17 inches, unless otherwise directed by the Department. Maps and figures may be submitted in a larger electronic size than 11x17 inches, in a portable document format (pdf) readable by the Adobe Acrobat Reader. However, those larger-size documents must be legible when printed.
- Prepare visual aids, including maps, plans, drawings, fence diagrams, tables and photographs according to the applicable portions of ss. NR 716.15(2)(h)1 and 726.05(3)(a)4.d, Wis Adm. Code.
- Do not use shading or highlights on any of the analytical tables.
- Include all sample locations.
- Contour lines should be clearly labeled and defined.
- Include in Attachment B all of the following maps and figures, in the order prescribed below, with the specific Closure Form titles noted on the separate attachments (e.g., Title: B.1. Location Map; B.2. Detailed Site Map, etc).
- For the electronic copies that are required, each map (e.g., B.1.a., B.2.a, etc.) should be a separate PDF.

#### B.1. Location Maps

- B.1.a. **Location Map:** A map outlining all properties within the contaminated site boundaries on a U.S.G.S. topographic map or plat map in sufficient detail to permit easy location of all impacted and/or adjacent parcels. If groundwater standards are exceeded, include the location of all potable wells, including municipal wells, within 1200 feet of the area of contamination.
- B.1.b. **Detailed Site Map:** A map that shows all relevant features (buildings, roads, current ground surface cover, individual property boundaries for on-site and applicable off-site properties, contaminant sources, utility lines, monitoring wells and potable wells) within the contaminated area. This map is to show the location of all contaminated public streets, and highway and railroad rights-of-way in relation to the source property and in relation to the boundaries of groundwater contamination exceeding a ch. NR 140 Enforcement Standard (ES), and/or in relation to the boundaries of soil contamination exceeding a Residual Contaminant Level (RCL) or a Site Specific Residual Contaminant Levels

(SSRCL) as determined under ss. NR 720.09, 720.11 and 720.19, Wis. Adm. Code.

B.1.c. **RR Site Map:** From RR Sites Map (<http://dnrmaps.wi.gov/imf/imf.jsp?site=brrts2>) attach a map depicting the source property, and all open and closed BRRTS sites within a half-mile radius or less of the property.

## B.2. Soil Figures

B.2.a. **Pre-remedial Soil Contamination:** Figure(s) showing the sample location of all pre-remedial, unsaturated contaminated soil and a single contour showing the horizontal extent of each area of contiguous residual soil contamination that exceeded a Residual Contaminant Level (RCL) or a Site-Specific Residual Contaminant Level (SSRCL) as determined under ss. NR 720.09, 720.11 and 720.19, Wis. Adm. Code.

B.2.b. **Post-remedial Soil Contamination :** Figure(s) showing the sample location of all post-remedial, unsaturated contaminated soil and a single contour showing the horizontal extent of each area of contiguous residual soil contamination that exceeds a Residual Contaminant Level (RCL) or a Site-Specific Residual Contaminant Level (SSRCL) as determined under ss. NR 720.09, 720.11 and 720.19, Wis. Adm. Code. A separate contour line should be used to indicate the extent of residual direct contact exceedances.

B.2.c. **Pre/Post Remaining Soil Contamination:** Figure(s) showing the only location of all pre and post remedial residual soil sample location(s) where unsaturated contaminated soil remains after remediation and a single contour showing the horizontal extent of each area of contiguous residual soil contamination that exceeds a Residual Contaminant Level (RCL) or a Site-Specific Residual Level (SSRCL) as determined under ss. NR 720.09, 720.11 and 720.19, Wis. Admin. Code. A separate contour line should be used to indicate the extent of residual direct contact exceedances.

## B.3. Groundwater Figures

B.3.a. **Geologic Cross-Section Figure(s):** One or more cross-section diagrams showing soil types and correlations across the site, water table and piezometric elevations, and locations and elevations of geologic rock units, if encountered. Display on one or more figures all of the following:

- Source location(s) and vertical extent of residual soil contamination exceeding a Residual Contaminant Level (RCL) or a Site Specific Residual Contaminant Level (SSRCL).
- Source location(s) and lateral and vertical extent if groundwater contamination exceeds a ch. NR 140 Enforcement Standard (ES)
- Surface features, including buildings and basements, and show surface elevation changes.
- Any areas of active remediation within the cross section path, such as excavations or treatment zones.
- Include a map displaying the cross-section location(s), if they are not displayed on the Detailed Site Map (Map B.1b)

B.3.b. **Groundwater Isoconcentration:** Figure(s) showing the horizontal extent of the post-remedial groundwater contamination exceeding a ch. NR 140, Wis. Adm. Code, Preventive Action Limit (PAL) and/or an Enforcement Standard (ES). Indicate the date and direction of groundwater flow based on the most recent sampling data.

B.3.c. **Groundwater Flow Direction:** Figure(s) representing groundwater movement at the site. If the flow direction varies by more than 20° over the history of the site, submit two groundwater flow maps showing the maximum variation in flow direction.

B.3.d. **Monitoring Wells:** Figure(s) showing all monitoring wells, with well identification number. Clearly designate any wells that: (1) are proposed to be abandoned; (2) cannot be located; (3) are being transferred; (4) will be retained for further sampling, or (5) have been previously abandoned.

## B.4. Vapor Maps and Other Media

B.4.a. **Vapor Intrusion Map:** Map(s) showing all locations and results for samples taken to investigate the vapor intrusion pathway, in relation to remaining soil and groundwater contamination, including sub-slab, indoor air, soil vapor, ambient air, and communication testing. Show locations and footprints of affected structures and utility corridors, and/or where residual contamination poses a future risk of vapor intrusion.

B.4.b. **Other media of concern (e.g., sediment or surface water):** Map(s) showing all sampling locations and results for other media investigation. Include the date of sample collection and identify where any standards are exceeded.

B.4.c. **Other:** Include any other relevant maps and figures not otherwise noted above. (This section may remain blank)

## Documentation of Remedial Action (Attachment C)

*If any section is not relevant to the case closure request, you must fully explain the reasons why and attach that explanation to the relevant section of the form. All information submitted shall be legible. Providing illegible information may result in a submittal being considered incomplete until corrected.*

### General Directions:

- Include in Attachment C all of the following documentation, in the order prescribed below, with the specific Closure Form titles noted on the separate attachments (e.g., Title: C.1. Site Investigation Documentation; C.2. Investigative Waste, etc).
- If the documentation requested below is "not applicable" to the site-specific circumstances, include a brief explanation to support that conclusion.
- If the documentation requested below has already been submitted to the Department, please note the title and date of the report for



that particular document requested.

- C.1. **Site investigation documentation**, that has not otherwise been previously submitted.
- C.2. **Investigative waste** disposal documentation.
- C.3. **NR 720.19 analysis**, assumptions and calculations for site specific RCLs (SSRCLs) , with justification, including EPA Soil Screening Level Model Calculations and results.
- C.4. **Construction documentation** or as-built report for any constructed remedial action or portion of, or interim action specified in s. NR 724.02(1), Wis. Adm. Code.
- C.5. **Decommissioning of Remedial Systems**. Include plans to properly abandon any systems or equipment upon receiving conditional closure.
- C.6. **Photos**. For sites or facilities with a cover or other performance standard, a structural impediment or a vapor mitigation system. Include one or more photographs documenting the condition and extent of the feature at the time of the closure request. Pertinent features should be visible and discernible. Photographs must be labeled with the site name, the features shown, location and the date on which the photograph was taken.
- C.7. **Other**. Include any other relevant documentation not otherwise noted above. (This section may remain blank)

#### **Maintenance Plan(s) (Attachment D)**

*If any section is not relevant to the case closure request, you must fully explain the reasons why and attach that explanation to the relevant section of the form. All information submitted shall be legible. Providing illegible information may result in a submittal being considered incomplete until corrected.*

When one or more "maintenance plans" are required for a site closure, include in each maintenance plan all required information in sections D.1. through D.5. below, and attach the plan(s) in Attachment D. The following "model" maintenance plans can be located at: (1) Maintenance plan for a engineering control or cover: <http://dnr.wi.gov/topic/Brownfields/documents/maintenance-plan.pdf>; and (2) Maintenance plan for vapor intrusion: [http://dnr.wi.gov/topic/Brownfields/documents/appendix5\\_606.pdf](http://dnr.wi.gov/topic/Brownfields/documents/appendix5_606.pdf).

- D.1. **Location map(s)** which show(s): (1) the feature that requires maintenance; (2) the location of the feature(s) that require(s) maintenance - on and off the source property; (3) the extent of the structure or feature(s) to be maintained, in relation to other structures or features on the site; (4) the extent and type of residual contamination; and (5) and all property boundaries.
- D.2. **Brief descriptions** of the type, depth and location of residual contamination.
- D.3. **Description of maintenance action(s)** required for maximizing effectiveness of the engineered control, vapor mitigation system, feature or other action for which maintenance is required.
- D.4. **Inspection log**, to be maintained on site, or at a location specified in the maintenance plan or approval letter.
- D.5. **Contact information**, including the name, address and phone number of the individual or facility who will be conducting the maintenance.

#### **Monitoring Well Information (Attachment E)**

*If any section is not relevant to the case closure request, you must fully explain the reasons why and attach that explanation to the relevant section of the form. All information submitted shall be legible. Providing illegible information may result in a submittal being considered incomplete until corrected.*

##### **General Directions:**

Attach monitoring well construction and development forms (DNR FORM 4400-113 A and B:

[http://dnr.wi.gov/topic/groundwater/documents/forms/4400\\_113\\_1\\_2.pdf](http://dnr.wi.gov/topic/groundwater/documents/forms/4400_113_1_2.pdf)) for all wells that will remain in-use, be transferred to another party or that could not be located. A figure of these wells should be included in Attachment B.3.d.

##### **Select One:**

- No monitoring wells were required as part of this response action.
- All monitoring wells have been located and will be properly abandoned upon the DNR granting conditional closure to the site
- Select One or More:**
  - Not all monitoring wells can be located, despite good faith efforts. Attachment E must include description of efforts made to locate the "lost" wells.
  - One or more wells will be transferred to another owner upon case closure being granted. Attachment E should include documentation identifying the name, address and email for the new owner(s).
  - One or more wells will remain in use at the site after this closure. Attachment E must include documentation as to the reason(s) the well(s) will remain in use.

**Notifications to Owners of Impacted Properties (Attachment F)**

If any section is not relevant to the case closure request, you must fully explain the reasons why and attach that explanation to the relevant section of the form. All information submitted shall be legible. Providing illegible information may result in a submittal being considered incomplete until corrected.

**General Directions:**

- State law requires that the responsible party provide a 30-day, written advance notice (i.e., a letter) to certain persons prior to applying for case closure. This requirement applies if: (1) the person conducting the response action does not own the source property; (2) the contamination has migrated onto another property; and/or (3) one or more monitoring wells will not be abandoned.
- A model "template letter" for these mandatory notifications can be downloaded at: <http://dnr.wi.gov/files/PDF/pubs/rr/RR919.pdf>.

Check all that apply to the site-specific circumstances of this case closure:

	A. Impacted Source Property and Owner is not Conducting Cleanup	B. Impacted Right of Way	C. Impacted Off-Site Property Owner	Impacted Property Notification Situations: Ch. NR 726 Appendix A Letter
1.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Residual groundwater contamination exceeds Ch. NR 140 Wis. Administrative Code enforcement standards.
2.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Residual soil contamination that attains or exceeds standards is present after the remedial action is complete, and must be properly managed should it be excavated or removed.
3.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	An engineered cover or a soil barrier (e.g. pavement) must be maintained over contaminated soil for direct contact or groundwater infiltration concerns.
4.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Industrial land use soil standards were used for the clean-up standard.
5.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	A vapor mitigation system (or other specific vapor protection) must be operated and maintained.
6.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Vapor assessment needed if use changes.
7.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Structural impediment.
8.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Lost, transferred or open monitoring wells.
9.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Not Applicable.

If any of the previous boxes in rows 1 thru 8 were checked, include the following as part of Attachment F:

- FORM 4400-246;
- Copy of each letter sent, 30 days or more prior to requesting closure; and
- Proof of receipt for each letter.
- For this site closure, 2 (number) property (ies) has/have been impacted, the owners have been notified, and copies of the letters and receipts are included in Attachment F.

**Source Legal Documents (Attachment G)**

If any section is not relevant to the case closure request, you must fully explain the reasons why and attach that explanation to the relevant section of the form. All information submitted shall be legible. Providing illegible information may result in a submittal being considered incomplete until corrected.

Include all of the following documents, in this order, in Attachment G:

- G.1. **Deeds - Source Property and Other Impacted Properties:** The most recent deed with legal descriptions clearly labeled for (1) the **Source Property** (where the contamination originated) and (2) all **off-source** (off-site) properties where letters were required to be sent per the ch. NR 700, Wis. Adm. Code, rule series (e.g., off-site cover maintenance required, lost monitoring well, off-site cover property impacts to groundwater exceeding the ch. NR 140, Wis. Adm. Code).  
*Note: If a property has been purchased with a land contract and the purchaser has not yet received a deed, a copy of the land contract which includes the legal description shall be submitted instead of the most recent deed. If the property has been inherited, written documentation of the property transfer should be submitted along with the most recent deed.*
- G.2. **Certified Survey Map:** A copy of the certified survey map or the relevant section of the recorded plat map for those properties where the legal description in the most recent deed refers to a certified survey map or a recorded plat map. (Lots on subdivided or platted property (e.g. lot 2 of xyz subdivision)).
- G.3. **Verification of Zoning:** Documentation (e.g., official zoning map or letter from municipality) of the property's or properties' current zoning status.
- G.4. **Signed Statement:** A statement signed by the Responsible Party (RP), which states that he or she believes that the attached legal description(s) accurately describe(s) the correct contaminated property or properties.

**Signatures and Findings for Closure Determination**

If any section is not relevant to the case closure request, you must fully explain the reasons why and attach that explanation to the relevant section of the form. All information submitted shall be legible. Providing illegible information may result in a submittal being considered incomplete until corrected.

Check the correct signature block below for this case closure request, and have the proper environmental professional(s) sign this document, in accordance with the ch. NR 700 Wis. Adm. Code rule series. Both boxes may be checked if applicable to this case closure.

A response action(s) for this site addresses groundwater contamination (including natural attenuation remedies). In this situation, the closure request must be prepared by, or under the supervision of, a professional engineer and a hydrogeologist, as defined in ch. NR 712, Wis. Adm. Code. Include both signatures provided below with the submittal.

The response action(s) for this site addresses media other than groundwater. In this situation, the case closure request must be prepared by, or under the supervision of, a professional engineer, as defined in ch. NR 712, Wis. Adm. Code. The "engineering certification" language below, at a minimum, must be signed.

**Engineering Certification**

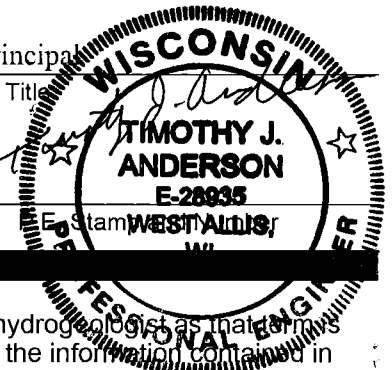
I, Timothy J. Anderson hereby certify that I am a registered professional engineer in the State of Wisconsin, registered in accordance with the requirements of ch. A-E 4, Wis. Adm. Code; that this case closure request has been prepared in accordance with the Rules of Professional Conduct in ch. A-E 8, Wis. Adm. Code; and that, to the best of my knowledge, all information contained in this case closure request is correct and the document was prepared in compliance with all applicable requirements in chs. NR 700 to 726, Wis. Adm. Code. All phases of work necessary to obtain data, develop conclusions, recommendations and prepare submittals for this case closure request have been prepared by me, or their preparation has been supervised by me. Specifically, with respect to compliance with the rules, in my professional opinion a site investigation has been conducted in accordance with ch. NR 716, Wis. Adm. Code, and all necessary remedial actions have been completed in accordance with chs. NR 140, NR 718, NR 720, NR 722, NR 724 and NR 726, Wis. Adm. Codes."

Timothy J. Anderson

Printed Name

Principal

Title



Timothy J. Anderson  
Signature

9/13/2013

Date

**Hydrogeologist Certification**

I, Scott J. Brockway hereby certify that I am a hydrogeologist as that term is defined in s. NR 712.03 (1), Wis. Adm. Code, and that, to the best of my knowledge, all of the information contained in this case closure request is correct and the document was prepared in compliance with all applicable requirements in chs. NR 700 to 726, Wis. Adm. Code. All phases of work necessary to address groundwater contamination including obtaining data, developing conclusions, recommendations and preparing submittals for this case closure request have been prepared by me, or their preparation has been supervised by me. Specifically, with respect to compliance with the rules, in my professional opinion a site investigation has been conducted in accordance with ch. NR 716, Wis. Adm. Code, and all necessary remedial actions have been completed in accordance with chs. NR 140, NR 718, NR 720, NR 722, NR 724 and NR 726, Wis. Adm. Codes."

Scott J. Brockway

Printed Name

Hydrogeologist

Title

Scott J. Brockway  
Signature

9/13/2013

Date

A.1. Groundwater Analytical Tables  
 Fox Valley Steel and Wire  
 111 N. Douglas Street  
 Hortonville, Wisconsin 54944

Analyte	MW-1					MW-2					MW-3					ES	PAL
	11/29/10	04/27/11	07/29/11	10/31/11	10/10/12	11/29/10	04/27/11	07/29/11	10/31/11	10/10/12	11/24/10	04/27/11	07/29/11	10/31/11	10/10/12		
<b>Cyanide (Method: SW9010B/9014 BY AQUACHEM)</b>																	
Cyanide, Amenable	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	<0.01	NA	NA	NA	NA	0.2	0.04
Cyanide, Total	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	<0.01	NA	NA	NA	NA	-	-
<b>RCRA Metals and Zinc (Method: SW6020A/SW3005A/SW7470A/HG PREP)</b>																	
Arsenic	<0.00889	<0.0111	<0.0125	<0.05	NA	<0.00889	<0.0111	<0.0125	<0.05	NA	<0.00889	<0.0111	<0.0125	<0.05	NA	0.01	0.001
Barium	0.106	0.0491	0.0886	0.077J	NA	0.124	0.0822	0.0299	0.092J	NA	0.323	0.0939	0.263	0.47J	NA	2	0.4
Cadmium	<0.00444	<0.00222	<0.0025	<0.005	NA	<0.00444	<0.00222	<0.0025	<0.005	NA	<0.00444	<0.00222	<0.0025	<0.005	NA	0.005	0.0005
Chromium	<0.00889	<0.0156	<0.0175	<0.1	NA	<0.00889	<0.0156	<0.0175	<0.1	NA	<0.00889	<0.0156	<0.0175	0.012J	NA	0.10	0.01
Lead	<0.00667	<0.00444	<0.005	<0.0075	NA	<0.00667	<0.00444	<0.005	<0.0075	NA	<0.00667	<0.00444	<0.005	<0.0075	NA	0.015	0.0015
Mercury	<0.0005	<0.0005	<0.0005	<0.0005	NA	<0.0005	<0.0005	<0.0005	<0.0005	NA	<0.0005	<0.0005	<0.0005	<0.0005	NA	0.002	0.0002
Selenium	0.0036J	<0.04	0.003J	0.0034J	NA	0.0037J	<0.04	<0.05	<0.05	NA	0.003J	<0.04	<0.05	0.0039J	NA	0.05	0.01
Silver	<0.00667	<0.00444	<0.005	<0.05	NA	<0.00667	<0.00444	<0.005	<0.05	NA	<0.00667	<0.00444	<0.005	<0.05	NA	0.05	0.01
Zinc	0.0481	0.0961	0.048J	0.028J	NA	<0.02	0.493	0.72	0.39J	NA	0.213	0.28	0.128	0.43J	NA	5	2.5

Notes: All results expressed as mg/L

ES NR140 Enforcement Standard (Exceedances in **Bold**)

PAL NR140 Preventive Action Limit (Exceedances in *Italics*)

J Analyte detected below quantitation limits

B Analyte detected in the associated Method Blank

< Compound not detected at or above the Method Detection Limit

NA Compound not analyzed

A.1. Groundwater Analytical Tables  
 Fox Valley Steel and Wire  
 111 N. Douglas Street  
 Hortonville, Wisconsin 54944

Analyte	MW-4						MW-5					MW-6					ES	PAL
	11/24/10	04/27/11	07/29/11	10/31/11	04/04/12	10/10/12	11/24/10	04/27/11	07/29/11	10/31/11	10/10/12	11/24/10	04/27/11	07/29/11	10/31/11	10/10/12		
<b>Cyanide (Method: SW9010B/9014 BY AQUACHEM)</b>																		
Cyanide, Amenable	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.2	0.04
Cyanide, Total	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	-	-
<b>RCRA Metals and Zinc (Method: SW6020A/SW3005A/SW7470A/HG PREP)</b>																		
Arsenic	<0.00889	<0.0111	<0.0125	<0.05	NA	NA	<0.00889	<0.0111	<0.0125	<0.05	NA	<0.00889	<0.0111	<0.0125	<0.05	NA	0.01	0.001
Barium	<i>0.491</i>	0.19	0.117	0.64J	NA	NA	0.224	0.0343	0.0156	0.14J	NA	0.0898	0.0434	0.0216	0.074J	NA	2	0.4
Cadmium	<0.00444	<0.00222	<0.0025	<0.005	NA	NA	<0.00444	<0.00222	<0.0025	<0.005	NA	<0.00444	<0.00222	<0.0025	<0.005	NA	0.005	0.0005
Chromium	<0.00889	<0.0156	<0.0175	0.016J	NA	NA	<0.00889	<0.0156	<0.0175	<0.1	NA	<0.00889	<0.0156	<0.0175	<0.1	NA	0.10	0.01
Lead	<0.00667	<0.00444	<0.005	<0.0075	NA	NA	<i>0.0019J</i>	<0.00444	<0.005	<i>0.0027J</i>	NA	<0.00667	<0.00444	<0.005	<0.0075	NA	0.015	0.0015
Mercury	<0.0005	<0.0005	<0.0005	<0.0005	NA	NA	<0.0005	<0.0005	<0.0005	<0.0005	NA	<b>0.508</b>	<0.0005	<0.0005	<0.0005	NA	0.002	0.0002
Selenium	0.0024J	<0.04	<0.05	0.0035J	NA	NA	0.0036J	<0.04	<0.05	<0.05	NA	0.0033J	<0.04	0.0019J	0.0043J	NA	0.05	0.01
Silver	<0.00667	<0.00444	<0.005	<0.05	NA	NA	<0.00667	<0.00444	<0.005	<0.05	NA	<0.00667	<0.00444	<0.005	<0.05	NA	0.05	0.01
Zinc	<b>7.39</b>	<b>8.22</b>	3.28	3.4J	<b>7.89</b>	0.339	0.0089J	0.0737	<0.0575	<5	NA	0.014J	0.0568	<0.0575	<5	NA	5	2.5

Notes: All results expressed as mg/L

ES NR140 Enforcement Standard (Exceedances in **Bold**)

PAL NR140 Preventive Action Limit (Exceedances in *Italics*)

J Analyte detected below quantitation limits

B Analyte detected in the associated Method Blank

< Compound not detected at or above the Method Detection Limit

NA Compound not analyzed

A.1. Groundwater Analytical Tables  
 Fox Valley Steel and Wire  
 111 N. Douglas Street  
 Hortonville, Wisconsin 54944

Analyte	MW-7					MW-8						MW-9					ES	PAL
	11/24/10	04/27/11	07/29/11	10/31/11	10/10/12	11/24/10	04/27/11	07/29/11	10/31/11	04/04/12	10/10/12	11/24/10	04/27/11	07/29/11	10/31/11	10/10/12		
<b>Cyanide (Method: SW9010B/9014 BY AQUACHEM)</b>																		
Cyanide, Amenable	NA	NA	NA	NA	NA	<0.01	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.2	0.04
Cyanide, Total	NA	NA	NA	NA	NA	<0.01	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	-	-
<b>RCRA Metals and Zinc (Method: SW6020A/SW3005A/SW7470A/HG PREP)</b>																		
Arsenic	<0.00889	<0.0111	<0.0125	<0.05	NA	<0.00889	<0.0111	<0.0125	<0.05	NA	NA	<0.00889	<0.0111	<0.0125	<0.05	NA	0.01	0.001
Barium	0.0863B	0.0277	0.0532	0.057J	NA	0.582	0.231	0.138	1.3J	NA	NA	0.0924	0.0406	0.0531	0.051J	NA	2	0.4
Cadmium	<0.00444	<0.00222	<0.0025	<0.005	NA	<0.00444	<0.00222	<0.0025	0.0009J	NA	NA	<0.00444	<0.00222	<0.0025	<0.005	NA	0.005	0.0005
Chromium	<0.00889	<0.0156	<0.0175	<0.1	NA	<0.00889	<0.0156	<0.0175	0.031J	NA	NA	<0.00889	<0.0156	<0.0175	<0.1	NA	0.10	0.01
Lead	<0.00667	<0.00444	<0.005	<0.0075	NA	<0.00667	<0.00444	<0.005	<0.0075	NA	NA	<0.00667	<0.00444	<0.005	<0.0075	NA	0.015	0.0015
Mercury	<0.0005	NA	<0.0005	<0.0005	NA	<0.0005	<0.0005	<0.0005	<0.0005	NA	NA	<0.0005	<0.0005	<0.0005	<0.0005	NA	0.002	0.0002
Selenium	0.0022J	<0.04	<0.05	<0.05	NA	0.0042J	<0.04	0.0024J	0.0038J	NA	NA	0.0022J	<0.04	0.0041J	0.002J	NA	0.05	0.01
Silver	<0.00667	<0.00444	<0.005	<0.05	NA	<0.00667	<0.00444	<0.005	<0.05	NA	NA	<0.00667	<0.00444	<0.005	<0.05	NA	0.05	0.01
Zinc	<0.02	0.0636	<0.0575	<5	NA	1.08	2.85	0.912	1.1J	1.9	1.07	0.137	0.15	0.437	0.24J	NA	5	2.5

Notes: All results expressed as mg/L

ES NR140 Enforcement Standard (Exceedances in **Bold**)

PAL NR140 Preventive Action Limit (Exceedances in *Italics*)

J Analyte detected below quantitation limits

B Analyte detected in the associated Method Blank

< Compound not detected at or above the Method Detection Limit

NA Compound not analyzed

A.1. Groundwater Analytical Tables  
 Fox Valley Steel and Wire  
 111 N. Douglas Street  
 Hortonville, Wisconsin 54944

Analyte	MW-10						MW-11			MW-12		MW-13		N2729	PW-111	ES	PAL
	11/24/10	04/27/11	07/29/11	10/31/11	04/04/12	10/10/12	11/01/11	04/04/12	10/10/12	11/01/11	10/10/12	11/01/11	10/10/12	11/30/10	12/06/10		
<b>Cyanide (Method: SW9010B/9014 BY AQUACHEM)</b>																	
Cyanide, Amenable	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.2	0.04
Cyanide, Total	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	-	-
<b>RCRA Metals and Zinc (Method: SW6020A/SW3005A/SW7470A/HG PREP)</b>																	
Arsenic	<0.00889	<0.0111	0.0025J	<0.05	NA	NA	<0.05	NA	NA	<0.05	NA	<0.05	NA	<0.00889	<0.008	0.01	0.001
Barium	1.08	0.0443	0.0536	0.73J	NA	NA	0.53J	NA	NA	0.25J	NA	0.12J	NA	0.0226B	0.234	2	0.4
Cadmium	0.00067J	<0.00222	<0.0025	<0.005	NA	NA	<0.005	NA	NA	<0.005	NA	<0.005	NA	<0.00444	<0.004	0.005	0.0005
Chromium	<0.00889	<0.0156	<0.0175	0.0094J	NA	NA	<0.1	NA	NA	<0.1	NA	<0.1	NA	<0.00889	<0.008	0.10	0.01
Lead	<0.00667	<0.00444	<0.005	<0.0075	NA	NA	<0.0075	NA	NA	<0.0075	NA	<0.0075	NA	<0.00667	<0.006	0.015	0.0015
Mercury	<0.0005	<0.0005	<0.0005	0.0002J	NA	NA	<0.0005	NA	NA	<0.0005	NA	<0.0005	NA	<0.0005	<0.0003	0.002	0.0002
Selenium	0.00593	<0.04	0.0014J	0.0081J	NA	NA	0.0055J	NA	NA	0.0074J	NA	0.0083J	NA	0.0031J	<0.0046	0.05	0.01
Silver	<0.00667	<0.00444	<0.005	<0.05	NA	NA	<0.05	NA	NA	<0.05	NA	<0.05	NA	<0.00667	<0.015	0.05	0.01
Zinc	<b>72.6</b>	4.56	<b>16.2</b>	<b>77.3</b>	<b>5.92</b>	<b>28</b>	0.079J	0.081	0.059	0.067J	NA	<5	NA	0.078	0.116	5	2.5

- Notes: All results expressed as mg/L
- ES NR140 Enforcement Standard (Exceedances in **Bold**)
- PAL NR140 Preventive Action Limit (Exceedances in *Italics*)
- J Analyte detected below quantitation limits
- B Analyte detected in the associated Method Blank
- < Compound not detected at or above the Method Detection Limit
- NA Compound not analyzed



A.1. Groundwater Analytical Tables  
 Fox Valley Steel and Wire  
 111 N. Douglas Street  
 Hortonville, Wisconsin 54944

Analyte	TW-1	TW-2	TW-4	TW-6	TW-7	TW-51	TW-52	TW-54	TW-55	ES	PAL
	8/3/2009					10/6/2011					
<b>Cyanide</b>											
Cyanide, Amenable	<0.01	<0.01	0.007J	0.003J	0.003J	N/A	N/A	N/A	N/A	0.2	0.04
Cyanide, Total	<0.01	<0.01	0.007J	0.003J	0.003J	N/A	N/A	N/A	N/A	-	-
<b>RCRA Metals and Zinc (Method: SW6020A / SW3015 and SW7470A/HG PREP)</b>											
Arsenic	<0.0131	<i>0.0056J</i>	N/A	<0.0131	<0.0131	<0.0125	<0.0125	<i>0.0045J</i>	<0.0125	0.01	0.001
Barium	0.032J	0.025J	N/A	<i>0.546</i>	<b>3.08</b>	0.0481	0.0385	0.184	0.0989	2	0.4
Cadmium	<0.00312	<0.00312	N/A	<0.00312	<i>0.00488</i>	<0.0025	<0.0025	<0.0025	<0.0025	0.005	0.0005
Chromium	<i>0.022J</i>	<i>0.0278</i>	N/A	<i>0.024J</i>	<i>0.0407</i>	<i>0.0531</i>	0.0079J	<i>0.0845</i>	<i>0.0235</i>	0.10	0.01
Lead	<0.00375	<0.00375	N/A	<0.00375	<0.00375	<i>0.0041J</i>	<0.005	<i>0.0123</i>	<i>0.0027J</i>	0.015	0.0015
Mercury	<0.0005	<i>0.0012</i>	N/A	<0.0005	<0.0005	<0.0005	<0.0005	<0.0005	<0.0005	0.002	0.0002
Selenium	<0.0144	<0.0144	N/A	<0.0144	<0.0144	<0.0025	<0.0025	<0.0025	<0.0025	0.05	0.01
Silver	<0.0206	<0.0206	N/A	<0.0206	<0.0206	<0.005	<0.005	<0.005	<0.005	0.05	0.01
Zinc	<0.0431	<0.0431	N/A	<b>&gt;154*</b>	<b>&gt;959*</b>	3.03	<b>11.9</b>	0.734	0.559	5	2.5

Notes: All results expressed as mg/L  
 ES NR140 Enforcement Standard (Exceedances in **Bold**)  
 PAL NR140 Preventive Action Limit (Exceedances in *Italics*)  
 J Analyte detected below quantitation limits  
 < Compound not detected at or above the method detection limit  
 \* Estimated concentration

A.2. Pre-remedial Soil Analytical Tables  
 Fox Valley Steel and Wire  
 111 N. Douglas Street  
 Hortonville, Wisconsin 54944  
 August 3, 2009

Borehole Location Depth	GP-1	GP-1	GP-2	GP-2	GP-3	GP-3	GP-4	GP-4	GP-5	GP-5	GP-6	GP-6	GP-7	GP-7	GP-8	GP-8	RCL			
	0"-3"	2 ½' -3'	0"-6"	4'-4 ½'	0"-3"	2' -2 ½'	0"-3"	2 ½' -3'	0'-1'	2'-2 ½'	0"-6"	1½'-2'	0'-1'	3 ½'-4'	0"-6"	2'-2 ½'	BTV	IDC	NIDC	GP
<b>Cyanide</b>																				
Cyanide, Amenable	<2.28	<1.85	<2.35	<2.02	<1.71	<2.31	0.8J	<2.28	<1.99	<2.37	<5.28	<2.16	<2.06	<2.94	<1.95	<1.87	-	613	46.9	4.04
Cyanide, Total	<2.28	<1.85	<2.35	<2.02	<1.71	<2.31	0.8J	<2.28	<1.99	<2.37	<5.28	<2.16	<2.06	<2.94	<1.95	<1.87	-	-	-	-
<b>RCRA Metals, Tin and Zinc</b>																				
Arsenic	<2.48	<2.72	2.1J	<2.69	6.58	<2.57	<2.53	1.4J	2.6J	1.6J	1.3J	1.8J	<2.53	<5.19	1.5J	<2.51	8.0	1.59	0.39	0.584
Barium	17.4	10.1	10.7	6.79	15.7	8.29	12.7	12.1	9.96	8.22	7.21	13.7	4.03	4.3J	7.42	9.15	-	100000	15300	164.8
Cadmium	<0.282	<0.31	<0.299	<0.306	<0.308	<0.293	<0.289	<0.294	<0.296	<0.291	<0.294	<0.309	<0.288	<0.592	<0.294	<0.286	-	803	70.2	0.752
Chromium	16.3	12J	25.6	9.8J	13J	8.2J	6.8J	9.4J	16	8J	13.9	8.6J	7.4J	7.9J	15.1	8.3J	-	100000	100000	360000
Lead	1.5J	1.3J	4.38	<2.69	23.5	1.5J	5.32	3.85	11	4.3	5.93	9.81	0.71J	<5.19	5.42	2.1J	-	800	400	27
Mercury	2.66	0.023J	3.03	0.018J	<0.0321	0.014J	<0.0304	<0.0298	<0.0309	0.023J	<0.0304	0.014J	0.018J	<0.0307	0.0346	<0.0302	-	3.13	3.13	0.208
Selenium	<1.83	<2.01	<1.94	<1.99	<2	<1.9	<1.87	<1.91	<1.92	<1.89	<1.91	<2.01	<1.87	<3.75	<1.91	<1.86	-	5110	391	0.52
Silver	<1.23	<1.35	<1.31	<1.34	<1.35	<1.28	<1.26	<1.28	<1.29	<1.27	<1.28	<1.35	<1.26	<2.58	<1.28	<1.25	-	5110	391	0.8497
Tin	<3.72	<4.07	<3.94	<4.03	2.9J	<3.86	19.3	<3.86	3J	<3.83	<3.86	<4.07	<3.79	<7.79	<3.87	<3.77	-	100000	46900	-
Zinc	828	62.1	24.4	<4.03	82.2	5.22	4540	4140	182	14.5	478	29.6	18.8	19.5	668	7.01	-	100000	23500	-

- Notes: All samples collected from the unsaturated zone  
 All results expressed as mg/kg
- RCL Residual Contaminant Level
- BTV Background Threshold Value as determined by Stensvold, K.A., 2012, Distribution and variation of arsenic in Wisconsin surface soils, with data on other trace elements: U.S. Geological Survey Scientific Investigations Report 2011-5202, 41 p., 1 app.
- IDC Industrial Direct Contact RCL (Exceedances in Bold)
- NIDC Non-Industrial Direct Contact (Exceedances in Bold)
- GP Groundwater Pathway RCL (Exceedances in Italics)
- RCL not established for this compound
- J Analyte detected below quantitation limits
- B Analyte detected in the associated Method Blank
- < Compound not detected at or above the Method Detection Limit

A.2. Pre-remedial Soil Analytical Tables  
 Fox Valley Steel and Wire  
 111 N. Douglas Street  
 Hortonville, Wisconsin 54944  
 September 27, 2010

Borehole Location Depth	GP-9	GP-9	GP-10	GP-10	GP-11	GP-11	GP-12	GP-12	GP-13	GP-13	GP-14	GP-14	RCL			
	0"-6"	5'-5 1/2'	1'-1 1/2'	5 1/2'-6'	1'-1 1/2'	6'-6 1/2'	1/2'-1'	6'-6 1/2'	3"-1'	5 1/2'-6'	1'-1 1/2'	5 1/2'-6'	BTV	IDC	NIDC	GP
<b>Cyanide (Method: SW9010B/9014 By AQUACHEM/SW 9010)</b>																
Cyanide, Amenable	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	-	613	46.9	4.04
Cyanide, Total	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	-	-	-	-
<b>RCRA Metals, Tin and Zinc (Method: SW6020A / SW3050B / SW7471A)</b>																
Arsenic	<5.22	<5.59	<5.05	<5.77	<5.32	<5.55	<5.33	<5.74	<5.14	<5.71	<5.1	<5.53	8.0	1.59	0.39	0.584
Barium	12.8	4J	14.6	3J	7.62	8	10.8	7.69	19.4	2.7J	6.43	3.2J	-	100000	15300	164.8
Cadmium	<2.61	<2.8	<2.53	<2.89	<2.66	<2.78	<2.66	<2.87	<2.57	<2.85	<2.55	<2.76	-	803	70.2	0.752
Chromium	4.4J	4.2J	4.6J	3.9J	10.5	6.08	6.65	4.5J	7.22	8.91	17.2	4.6J	-	100000	100000	360000
Lead	4.3J	<5.59	8.84	<5.77	19.5	<5.55	5.2J	<5.74	10.5	<5.71	10.5	<5.53	-	800	400	27
Mercury	<0.0229	<0.0026	<0.0294	<0.0358	<0.0242	<0.0238	0.0416	<0.0309	<0.0274	0.013J	<0.0285	<0.0275	-	3.13	3.13	0.208
Selenium	<2.17	<2.33	<2.1	<2.4	<2.21	<2.31	<2.22	<2.39	<2.14	<2.37	<2.12	<2.3	-	5110	391	0.52
Silver	<2.61	<2.8	<2.53	<2.89	<2.66	<2.78	<2.66	<2.87	<2.57	<2.85	<2.55	<2.76	-	5110	391	0.8497
Tin	<5.22	<5.59	<5.05	<5.77	<5.32	<5.55	<5.33	<5.74	<5.14	<5.71	5.79	<5.53	-	100000	46900	-
Zinc	61.9	302	1090	226	467	115	1240	58.3	27.6	437	741	195	-	100000	23500	-

- Notes: All samples collected from the unsaturated zone  
 All results expressed as mg/kg
- RCL Residual Contaminant Level
- BTV Background Threshold Value as determined by Stensvold, K.A., 2012, Distribution and variation of arsenic in Wisconsin surface soils, with data on other trace elements: U.S. Geological Survey Scientific Investigations Report 2011-5202, 41 p.,
- IDC Industrial Direct Contact RCL (Exceedances in Bold)
- NIDC Non-Industrial Direct Contact (Exceedances in Bold)
- GP Groundwater Pathway RCL (Exceedances in Italics)
- RCL not established for this compound
- J Analyte detected below quantitation limits
- B Analyte detected in the associated Method Blank
- < Compound not detected at or above the Method Detection Limit

A.2. Pre-remedial Soil Analytical Tables  
 Fox Valley Steel and Wire  
 111 N. Douglas Street  
 Hortonville, Wisconsin 54944  
 September 27, 2010

Borehole Location Depth	GP-15	GP-15	GP-16	GP-16	GP-17	GP-17	GP-18	GP-18	GP-19	GP-19	GP-20	GP-20	RCL			
	1/2'-1'	5 1/2'-6'	1/2'-1'	5'-5 1/2'	1'-1 1/2'	5'-5 1/2'	1'-1 1/2'	5'-5 1/2'	1'-1 1/2'	5'-5 1/2'	9"-1 1/2'	5 1/2'-6'	BTV	IDC	NIDC	GP
<b>Cyanide (Method: SW9010B/9014 By AQUACHEM/SW 9010)</b>																
Cyanide, Amenable	NA	NA	NA	NA	NA	NA	NA	NA	<0.223	<0.246	NA	NA	-	613	46.9	4.04
Cyanide, Total	NA	NA	NA	NA	NA	NA	NA	NA	<0.22	<0.25	NA	NA	-	-	-	-
<b>RCRA Metals, Tin and Zinc (Method: SW6020A / SW3050B / SW7471A)</b>																
Arsenic	<b>14.5</b>	<5.51	5.38	<5.6	<5.26	<5.75	<5.19	<5.58	<5.21	<5.76	<5.23	<5.64	8.0	1.59	0.39	0.584
Barium	9.15	12.9	15.4	3.5J	8.69	14.4	9.69	17.6	9.07	3.9J	14.4	7.36	-	100000	15300	164.8
Cadmium	<2.61	<2.76	<2.57	<2.8	<2.63	<2.88	<2.6	<2.79	<2.6	<2.88	<2.61	<2.82	-	803	70.2	0.752
Chromium	43.8	5.72	67.8	24.9	6.33	7.2	6.17	13.7	6.66	8.29	11.5	7.82	-	100000	100000	360000
Lead	7.97	<5.51	10.9	<5.6	9.61	<5.75	3.7J	2.2J	6.24	<5.76	<5.23	<5.64	-	800	400	27
Mercury	<0.0299	<0.0297	0.025	<0.0324	<0.029	<0.022	<0.028	<0.0294	<0.0273	<0.0334	<0.0279	<0.0306	-	3.13	3.13	0.208
Selenium	<2.17	<2.29	<2.14	<2.33	<2.19	<2.39	<2.16	<2.32	<2.17	<2.4	<2.17	<2.35	-	5110	391	0.52
Silver	<2.61	<2.76	<2.57	<2.8	<2.63	<2.88	<2.6	<2.79	<2.6	<2.88	<2.61	<2.82	-	5110	391	0.8497
Tin	10.9	<5.51	15	9.65	NA	NA	NA	NA	NA	NA	NA	NA	-	100000	46900	-
Zinc	1360	4.5J	2400	7.69	24.1	9.11	11.5	44.7	50.9	95.2	142	4.8J	-	100000	23500	-

- Notes: All samples collected from the unsaturated zone  
 All results expressed as mg/kg
- RCL Residual Contaminant Level
- BTV Background Threshold Value as determined by Stensvold, K.A., 2012, Distribution and variation of arsenic in Wisconsin surface soils, with data on other trace elements: U.S. Geological Survey Scientific Investigations Report
- IDC Industrial Direct Contact RCL (Exceedances in Bold)
- NIDC Non-Industrial Direct Contact (Exceedances in Bold)
- GP Groundwater Pathway RCL (Exceedances in Italics)
- RCL not established for this compound
- J Analyte detected below quantitation limits
- B Analyte detected in the associated Method Blank
- < Compound not detected at or above the Method Detection Limit

A.2. Pre-remedial Soil Analytical Tables  
 Fox Valley Steel and Wire  
 111 N. Douglas Street  
 Hortonville, Wisconsin 54944  
 September 27, 2010

Borehole Location Depth	GP-21	GP-21	GP-22	GP-22	GP-23	GP-23	GP-24	GP-24	GP-25	GP-25	GP-26	GP-26	RCL			
	1'-1 1/2'	5'-5 1/2'	2'-2 1/2'	6'-6 1/2'	1'-1 1/2'	5'-5 1/2'	1'-1 1/2'	5 1/2'-6'	0'-1'	5'-5 1/2'	1'-1 1/2'	5'-5 1/2'	BTV	IDC	NIDC	GP
<b>Cyanide (Method: SW9010B/9014 By AQUACHEM/SW 9010)</b>																
Cyanide, Amenable	NA	NA	NA	NA	NA	NA	NA	NA	<0.223	<0.243	<0.227	<0.24	-	613	46.9	4.04
Cyanide, Total	NA	NA	NA	NA	NA	NA	NA	NA	0.21J	0.22	0.2J	<0.24	-	-	-	-
<b>RCRA Metals, Tin and Zinc (Method: SW6020A / SW3050B / SW7471A)</b>																
Arsenic	<5.06	<5.59	<2.64	<2.8	<2.64	<2.85	<2.6	<2.77	1.9J	<2.72	<2.5	<2.89	8.0	1.59	0.39	0.584
Barium	9.83	13.9	12.3	13	15.4	6.08	8.86	4.84	7.73	3.2	7.82	2.8J	-	100000	15300	164.8
Cadmium	<2.53	<2.79	<0.27	<0.286	<0.269	<0.291	<0.265	<0.283	<0.255	<2.72	<0.255	<0.295	-	803	70.2	0.752
Chromium	7.52	10.4	6.95	6.35	8.29	4.78	6.77	5.59	7.68	7.99B	7.02	6.06	-	100000	100000	360000
Lead	7.37	<5.59	3.27	<2.8	3.53	<2.85	3.06	<2.77	6	1.4J	2.88	<2.89	-	800	400	27
Mercury	<0.0291	<0.0217	<0.0271	<0.0241	<0.028	<0.0346	<0.027	<0.0209	<0.0192	<0.0327	0.023J	<0.0279	-	3.13	3.13	0.208
Selenium	<2.1	<2.32	<1.1	<1.17	<1.1	<1.19	<1.08	<1.15	<1.04	<2.72	<1.04	<1.2	-	5110	391	0.52
Silver	<2.53	<2.79	<0.354	<0.376	<0.354	<0.382	<0.348	<0.372	<0.335	<2.72	0.44	<0.388	-	5110	391	0.8497
Tin	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	-	100000	46900	-
Zinc	11.5	7.04	10.8	7.95	13.6	41.2	363	161	691	152	2080	298	-	100000	23500	-

- Notes: All samples collected from the unsaturated zone  
 All results expressed as mg/kg
- RCL Residual Contaminant Level
- BTV Background Threshold Value as determined by Stensvold, K.A., 2012, Distribution and variation of arsenic in Wisconsin surface soils, with data on other trace elements: U.S. Geological Survey Scientific Investigations Report 2011-5202, 41
- IDC Industrial Direct Contact RCL (Exceedances in Bold)
- NIDC Non-Industrial Direct Contact (Exceedances in Bold)
- GP Groundwater Pathway RCL (Exceedances in Italics)
- RCL not established for this compound
- J Analyte detected below quantitation limits
- B Analyte detected in the associated Method Blank
- < Compound not detected at or above the Method Detection Limit

A.2. Pre-remedial Soil Analytical Tables  
 Fox Valley Steel and Wire  
 111 N. Douglas Street  
 Hortonville, Wisconsin 54944  
 September 28, 2010

Borehole Location Depth	GP-27	GP-27	GP-28	GP-28	GP-29	GP-29	GP-30	GP-30	GP-31	GP-31	GP-32	GP-32	RCL			
	1/2'-1'	5'-5 1/2'	1'-1 1/2'	5 1/2'-6'	1/2'-1'	5'-5 1/2'	1'-1 1/2'	5 1/2'-6'	1'-1 1/2'	5'-5 1/2'	1'-1 1/2'	6'-7'	BTV	IDC	NIDC	GP
<b>RCRA Metals and Zinc (Method: SW6020A / SW3050B / SW7471A)</b>																
Arsenic	3.43	<2.84	2.94	<2.8	<2.56	<2.81	<2.66	<2.7	5.01	<2.75	<2.55	<2.87	8.0	1.59	0.39	0.584
Barium	18.2	5.37	55.3	3.57	32	2.5J	27	2.7J	59.4	13.4	16.2	5.65	-	100000	15300	164.8
Cadmium	<0.272	<0.289	<2.73	<2.8	<0.261	<0.286	<0.272	<0.276	<0.277	<0.281	<0.261	<0.293	-	803	70.2	0.752
Chromium	26.6B	7.14	16.3B	6.92	8.96	11.4	9.85	7.96	15.3	7.76	5.95	13.2	-	100000	100000	360000
Lead	2.81	<2.84	4.88	<2.8	2.5J	1.2J	2.5J	1.3J	15.9	1.4J	2.1J	2.3J	-	800	400	27
Mercury	0.017J	<0.0307	<0.0316	<0.0348	<0.03	<0.0219	<0.032	<0.027	<0.0325	<0.0267	<0.0309	<0.0238	-	3.13	3.13	0.208
Selenium	<1.11	<1.18	1.2J	6.37	<1.07	<1.17	<1.11	<1.12	1.3	<1.15	<1.06	<1.2	-	5110	391	0.52
Silver	<0.357	<0.38	<2.73	<2.8	<0.343	<0.376	<0.357	<0.362	<0.364	<0.369	<0.342	<0.385	-	5110	391	0.8497
Zinc	36.8	6.73	29.6	5.49	13.5	10.9	16.4	4.13	112	4.11	70.4	14.8	-	100000	23500	-

- Notes: All samples collected from the unsaturated zone  
 All results expressed as mg/kg
- RCL Residual Contaminant Level
- BTV Background Threshold Value as determined by Stensvold, K.A., 2012,  
 Distribution and variation of arsenic in Wisconsin surface soils, with data on other  
 trace elements: U.S. Geological Survey Scientific Investigations Report
- IDC Industrial Direct Contact RCL (Exceedances in Bold)
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- GP Groundwater Pathway RCL (Exceedances in Italics)
- RCL not established for this compound
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- B Analyte detected in the associated Method Blank
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A.2. Pre-remedial Soil Analytical Tables  
 Fox Valley Steel and Wire  
 111 N. Douglas Street  
 Hortonville, Wisconsin 54944  
 September 28, 2010

Borehole Location Depth	GP-33	GP-33	GP-34	GP-34	GP-35	GP-35	GP-36	GP-36	GP-37	GP-37	GP-38	GP-38	RCL			
	1/2'-1'	5'-5 1/2'	1/2'-1'	5'-5 1/2'	0'-1/2'	5'-5 1/2'	1/2'-1'	5'-5 1/2'	1/2'-1'	5'-5 1/2'	1'-2'	5'-5 1/2'	BTV	IDC	NIDC	GP
<b>RCRA Metals and Zinc (Method: SW6020A / SW3050B / SW7471A)</b>																
Arsenic	<2.58	<2.97	6.22	<2.84	3.18	<2.79	3.02	<2.86	5.34	<2.86	1.7J	<2.86	8.0	1.59	0.39	0.584
Barium	12.4	16.9	21.1	3.85	43.9	3.99	70.7	4.63	13.6	2.6J	7.6	2.1J	-	100000	15300	164.8
Cadmium	<0.263	0.321	<0.263	<0.29	0.293	<0.285	<0.283	<0.292	<0.28	<0.292	<0.271	<0.292	-	803	70.2	0.752
Chromium	9.7	8.92	31.1	3.69	11.5	4.9	13.5	4.92	57	7.57	9.97	3.98	-	100000	100000	360000
Lead	9.78	7.06	76.3	<2.84	16.7	<2.79	6.55	<2.86	6.41	<2.86	10.9	<2.86	-	800	400	27
Mercury	<0.03	<0.027	<0.0305	<0.0279	<0.0229	<0.0257	<0.0324	<0.0306	<0.0323	<0.0197	0.015J	<0.0334	-	3.13	3.13	0.208
Selenium	<1.07	1.32	<1.07	<1.18	1.32	<1.16	<1.16	<1.19	<1.14	<1.19	<1.11	<1.19	-	5110	391	0.52
Silver	<0.346	<0.398	<0.345	<0.38	<0.357	<0.375	<0.372	<0.384	<0.368	<0.383	<0.356	<0.384	-	5110	391	0.8497
Zinc	3760	65.7	155	4.51	51	4.61	78.7	5.08	<b>40300</b>	169	27.3	42.5	-	100000	23500	-

- Notes: All samples collected from the unsaturated zone  
 All results expressed as mg/kg
- RCL Residual Contaminant Level
- BTV Background Threshold Value as determined by Stensvold, K.A., 2012, Distribution and variation of arsenic in Wisconsin surface soils, with data on other trace elements: U.S. Geological Survey Scientific Investigations Report 2011-5202, 41
- IDC Industrial Direct Contact RCL (Exceedances in Bold)
- NIDC Non-Industrial Direct Contact (Exceedances in Bold)
- GP Groundwater Pathway RCL (Exceedances in Italics)
- RCL not established for this compound
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- B Analyte detected in the associated Method Blank
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A.2. Pre-remedial Soil Analytical Tables  
 Fox Valley Steel and Wire  
 111 N. Douglas Street  
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Borehole Location Depth	GP-39	GP-39	GP-40	GP-40	GP-41	GP-41	GP-42	GP-42	GP-43	GP-43	GP-44	GP-44	RCL			
	3"-1'	4 1/2'-5'	1/2'-1'	5'-5 1/2'	1'-1 1/2'	5'-5 1/2'	3"-1'	5'-5 1/2'	3"-1'	5'-5 1/2'	1'-1 1/2'	5'-5 1/2'	BTV	IDC	NIDC	GP
<b>RCRA Metals and Zinc (Method: SW6020A / SW3050B / SW7471A)</b>																
Arsenic	2.99	<2.76	4.49	<2.89	<b>20</b>	<2.84	2.3J	<2.91	2.1J	<2.86	1.7J	<2.89	8.0	1.59	0.39	0.584
Barium	92	10.2	15.6	3.1	46.5	4.56	12.1	5.71	9.89	6.06	11.4	2.3J	-	100000	15300	164.8
Cadmium	<0.297	<0.282	<0.271	<0.295	<0.353	<0.289	<0.275	<0.297	<0.256	<0.291	<0.282	<0.295	-	803	70.2	0.752
Chromium	17.8	14.3	54.3	3.73	105	10J	12J	5.8J	11J	8.8J	11J	6.1J	-	100000	100000	360000
Lead	6.06	4.42	12.8	<2.89	52.7	<2.84	10.9	<2.91	7.9	1.4J	10.4	<2.89	-	800	400	27
Mercury	0.013J	<0.0296	<0.0279	<0.0278	0.0429	<0.0236	0.0099J	<0.0226	<0.0278	<0.0308	0.018J	<0.034	-	3.13	3.13	0.208
Selenium	1.32	1.23	1.59	1.36	<1.44	<1.14	<1.08	<1.17	<1.01	<1.15	<1.11	<1.16	-	5110	391	0.52
Silver	<0.39	<0.37	<0.356	<0.388	<0.464	<0.38	<0.361	<0.39	<0.337	<0.383	<0.37	<0.388	-	5110	391	0.8497
Zinc	49.7	1950	22300	92.7	149	5.41	866	72.7	30.5	81	1080	43.6	-	100000	23500	-

- Notes: All samples collected from the unsaturated zone  
 All results expressed as mg/kg
- RCL Residual Contaminant Level
- BTV Background Threshold Value as determined by Stensvold, K.A., 2012, Distribution and variation of arsenic in Wisconsin surface soils, with data on other trace elements: U.S. Geological Survey Scientific Investigations Report 2011-5202, 41
- IDC Industrial Direct Contact RCL (Exceedances in Bold)
- NIDC Non-Industrial Direct Contact (Exceedances in Bold)
- GP Groundwater Pathway RCL (Exceedances in Italics)
- RCL not established for this compound
- J Analyte detected below quantitation limits
- B Analyte detected in the associated Method Blank
- < Compound not detected at or above the Method Detection Limit



A.2. Pre-remedial Soil Analytical Tables  
 Fox Valley Steel and Wire  
 111 N. Douglas Street  
 Hortonville, Wisconsin 54944  
 September 28, 2010

Borehole Location Depth	GP-45	GP-45	GP-46	GP-46	GP-47	GP-47	GP-48	GP-48	GP-49	GP-49	GP-50	GP-50	RCL			
	3"-1'	5 1/2'-6'	6"-16"	5'-5 1/2'	9"-1 1/2'	4 1/2'-5'	1'-1 1/2'	5'-5 1/2'	9"-1 1/2'	4'-4 1/2'	1'-1 1/2'	4'-4 1/2'	BTV	IDC	NIDC	GP
<b>RCRA Metals and Zinc (Method: SW6020A / SW3050B / SW7471A)</b>																
Arsenic	2.5J	<2.96	4.43	<2.91	<2.57	<2.88	<2.61	<2.82	2.4J	<3.05	2J	5.15	8.0	1.59	0.39	0.584
Barium	13.7	3.84	28.7	2.3J	13.6	9.18	5.88	4.07	20.4	3.68	14.6	23.6	-	100000	15300	164.8
Cadmium	<0.265	<0.302	<0.304	<0.297	<0.262	<0.294	<0.267	<0.288	<0.29	<0.312	<0.271	<0.298	-	803	70.2	0.752
Chromium	19B	6.2J	21.7B	6.1J	6.2J	9.3J	25B	5.6J	11J	7.4J	9.7J	31.6B	-	100000	100000	360000
Lead	8.34	<2.96	11	<2.91	3.77	6.58	6.78	<2.82	14.4	<3.05	3.4	10.7	-	800	400	27
Mercury	<0.0302	<0.0342	0.023J	<0.0331	<0.0309	<0.0316	<0.0319	<0.0343	0.026J	<0.034	0.017J	<0.0343	-	3.13	3.13	0.208
Selenium	<1.04	<1.19	<1.2	<1.17	<1.03	<1.16	<1.05	<1.13	<1.14	<1.23	<1.07	2.24	-	5110	391	0.52
Silver	<0.348	<0.397	<0.399	<0.39	<0.344	<0.386	<0.35	<0.378	<0.381	<0.409	<0.356	<0.392	-	5110	391	0.8497
Zinc	9820	35	12800	28.3	11	1010	1250	66.3	5680	84	508	37900	-	100000	23500	-

- Notes: All samples collected from the unsaturated zone  
 All results expressed as mg/kg
- RCL Residual Contaminant Level
- BTV Background Threshold Value as determined by Stensvold, K.A., 2012, Distribution and variation of arsenic in Wisconsin surface soils, with data on other trace elements: U.S. Geological Survey Scientific Investigations Report 2011-5202, 41
- IDC Industrial Direct Contact RCL (Exceedances in Bold)
- NIDC Non-Industrial Direct Contact (Exceedances in Bold)
- GP Groundwater Pathway RCL (Exceedances in Italics)
- RCL not established for this compound
- J Analyte detected below quantitation limits
- B Analyte detected in the associated Method Blank
- < Compound not detected at or above the Method Detection Limit

A.2. Pre-remedial Soil Analytical Tables  
 Fox Valley Steel and Wire  
 111 N. Douglas Street  
 Hortonville, Wisconsin 54944  
 October 6, 2011

Borehole Location Depth	GP-51	GP-52	GP-52	GP-53	GP-53	GP-54	GP-55	GP-55	DS-1	DS-2	RCL			
	1/2'-1'	1/2'-1'	2 1/2'-3'	1/2'-1'	4'-4 1/2'	1/2'-1'	1/2'-1'	5'-5 1/2'	0"-6"	0"-6"	BTV	IDC	NIDC	GP
<b>RCRA Metals and Zinc (Method: SW6020A / SW3050B / SW7471A)</b>														
Arsenic	<6.54	<6.35	<6.97	1.2J	1.8J	<6.26	<6.44	<7.15	2.6J	2.8J	8.0	1.59	0.39	0.584
Barium	10J	6.9J	3.8J	13J	45.9	22	7.1J	8J	28.1	166	-	100000	15300	164.8
Cadmium	<0.262	<0.254	<0.279	<0.261	<0.292	<0.25	<0.257	<0.286	0.502	<0.327	-	803	70.2	0.752
Chromium	10.2	9.78	12.6	8.61	14.4	6.54	7.1	8.52	11.2	33.1	-	100000	100000	360000
Lead	3.9J	1.7J	1.6J	5.1J	4J	3.3J	2.3J	0.78J	12J	8.3J	-	800	400	27
Mercury	0.02J	0.027J	0.015J	0.02J	0.016J	0.014J	0.0034	0.023J	0.028J	0.032J	-	3.13	3.13	0.208
Selenium	<1.23	<1.19	<1.31	<1.23	<1.37	<1.18	<1.21	<1.34	<1.36	<1.54	-	5110	391	0.52
Silver	<0.262	0.34	<0.279	<0.261	<0.292	<0.25	<0.257	<0.286	<0.29	<0.327	-	5110	391	0.8497
Zinc	13J	22	33.5	136	32	12.8	165	120	579	98.5	-	100000	23500	-

- Notes: All samples collected from the unsaturated zone  
 All results expressed as mg/kg
- RCL Residual Contaminant Level
- BTV Background Threshold Value as determined by Stensvold, K.A., 2012, Distribution and variation of arsenic in Wisconsin surface soils, with data on other trace elements: U.S. Geological Survey Scientific Investigations Report 2011-5202, 41 p., 1 app.
- IDC Industrial Direct Contact RCL (Exceedances in Bold)
- NIDC Non-Industrial Direct Contact (Exceedances in Bold)
- GP Groundwater Pathway RCL (Exceedances in Italics)
- RCL not established for this compound
- J Analyte detected below quantitation limits
- B Analyte detected in the associated Method Blank
- < Compound not detected at or above the Method Detection Limit

### A.3. Post-remedial Soil Analytical Tables

Not Applicable

No active remedial action performed

A.4. Pre and Post Remaining Soil Contamination Soil Analytical Tables  
 Fox Valley Steel and Wire  
 111 N. Douglas Street  
 Hortonville, Wisconsin 54944  
 August 3, 2009 and September 28, 2010

Borehole Location Depth	GP-1 0"-3"	GP-2 0"-6"	GP-15 1/2'-1'	GP-28 1'-1 1/2'	GP-28 5 1/2'-6'	GP-31 1'-1 1/2'	GP-33 5'-5 1/2'	GP-34 1/2'-1'	GP-35 0'-1/2'	GP-37 1/2'-1'	GP-39 3"-1'	GP-39 4 1/2'-5'	GP-40 1/2'-1'	GP-40 5'-5 1/2'	GP-41 1'-1 1/2'	GP-50 4'-4 1/2'	RCL			
																	BTV	IDC	NIDC	GP
<b>RCRA Metals and Zinc (Method: SW6020A / SW3050B / SW7471A)</b>																				
Arsenic			<b>14.5</b>												<b>20</b>		8.0	1.59	0.39	0.584
Lead								76.3							52.7		-	800	400	27
Mercury	2.66	3.03															-	3.13	3.13	0.208
Selenium				1.2 <i>J</i>	6.37	1.3	1.32		1.32		1.32	1.23	1.59	1.36		2.24	-	5110	391	0.52
Zinc										<b>40300</b>							-	100000	23500	-

- Notes: All results expressed as mg/kg  
 RCL Residual Contaminant Level  
 BTV Background Threshold Value as determined by Stensvold, K.A., 2012, Distribution and variation of arsenic in Wisconsin surface soils, with data on other trace elements: U.S. Geological Survey Scientific Investigations Report 2011-5202, 41 p., 1 app.  
 IDC Industrial Direct Contact RCL (Exceedances in Bold)  
 NIDC Non-Industrial Direct Contact (Exceedances in Bold)  
 GP Groundwater Pathway RCL (Exceedances in Italics)  
 - RCL not established for this compound  
 J Analyte detected below quantitation limits  
 B Analyte detected in the associated Method Blank  
 < Compound not detected at or above the Method Detection Limit

#### A.5. Vapor Analytical Table

Not Applicable

Site investigation was limited to the analysis of RCRA metals, Zinc and total and amenable Cyanide. The analysis for the presence of Volatile Organic Compounds (VOC) was not required.

#### A.6. Other Media of Concern

Not Applicable

Site investigation did not require the sampling or analysis of sediment or surface water

Table A.7. Water Level Elevations

<b>Groundwater Elevation (Feet)</b>						
<b>Monitoring Well</b>	<b>Date</b>					
	<b>11/24 &amp; 11/29/2010</b>	<b>4/27/2011</b>	<b>7/29/2011</b>	<b>10/31/-11/01/2011</b>	<b>4/4/2012</b>	<b>10/10/2012</b>
MW-1	808.35	810.34	808.93	807.85	808.58	807.22
MW-2	807.62	810.01	808.40	807.14	808.03	806.64
MW-3	805.71	808.04	805.92	804.46	805.23	803.69
MW-4	804.82	807.47	804.90	803.50	804.83	802.16
MW-5	806.64	809.22	806.80	805.60	-	804.59
MW-6	804.97	804.34	805.19	803.79	-	-
MW-7	805.78	809.28	806.00	804.72	-	803.08
MW-8	805.24	807.66	805.40	803.92	805.01	802.63
MW-9	804.37	806.70	804.41	803.05	-	801.77
MW-10	804.40	806.65	804.48	803.05	804.68	801.88
MW-11	-	-	-	801.11	803.40	798.60
MW-12	-	-	-	801.63	-	807.68
MW-13	-	-	-	800.09	804.02	798.97

#### A.8. Other

Not Applicable

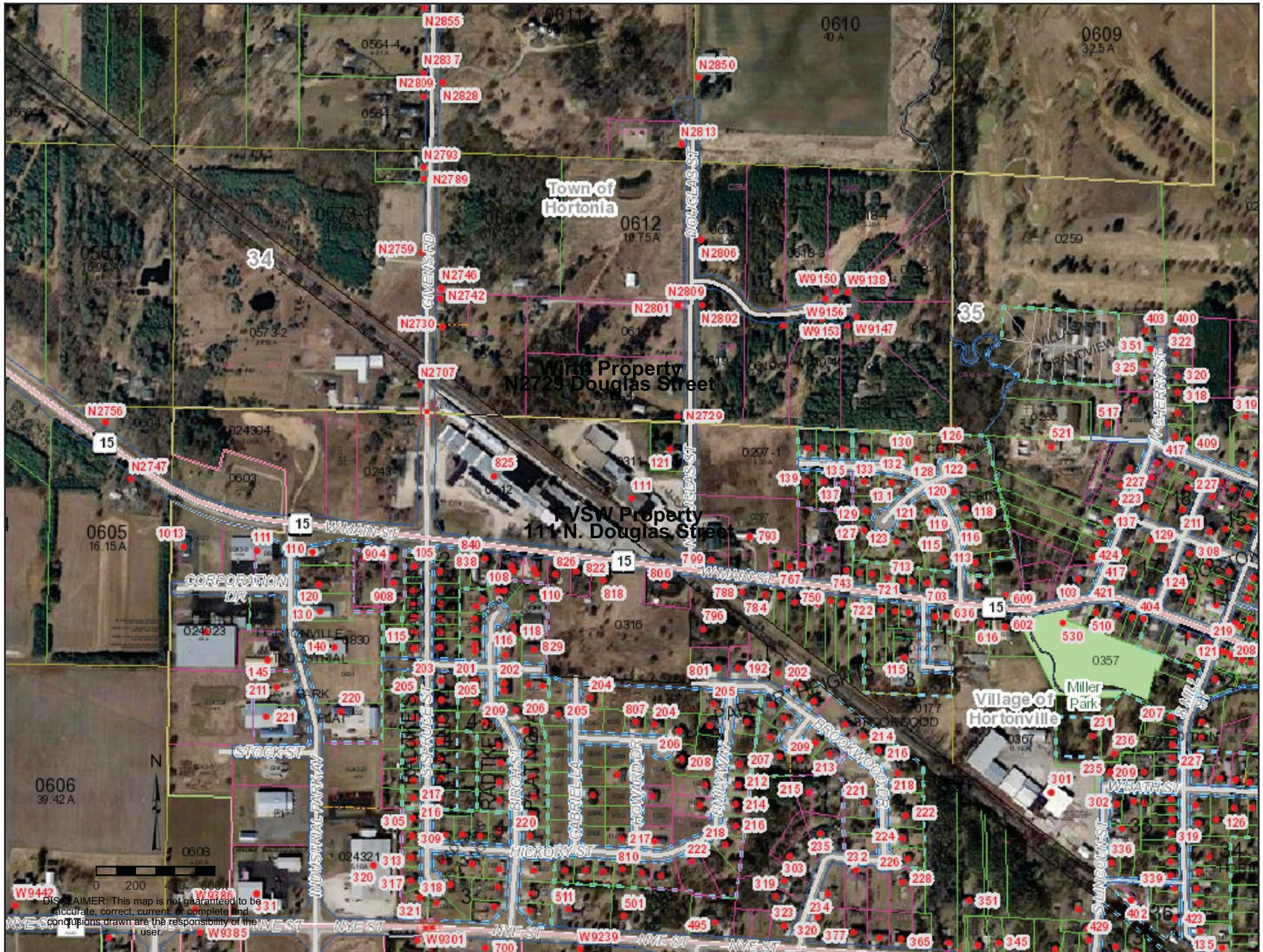
Site investigation did not require the collection of natural attenuation parameters due to the absence of Volatile Organic Compounds (VOC) in the workscope. In addition, an engineered remedial system was not installed.



### **B.1.a Location Map**

**Note: All developed properties located in the Town of Hortonia which is located immediately north of FVSW are assumed to utilize a potable well.**







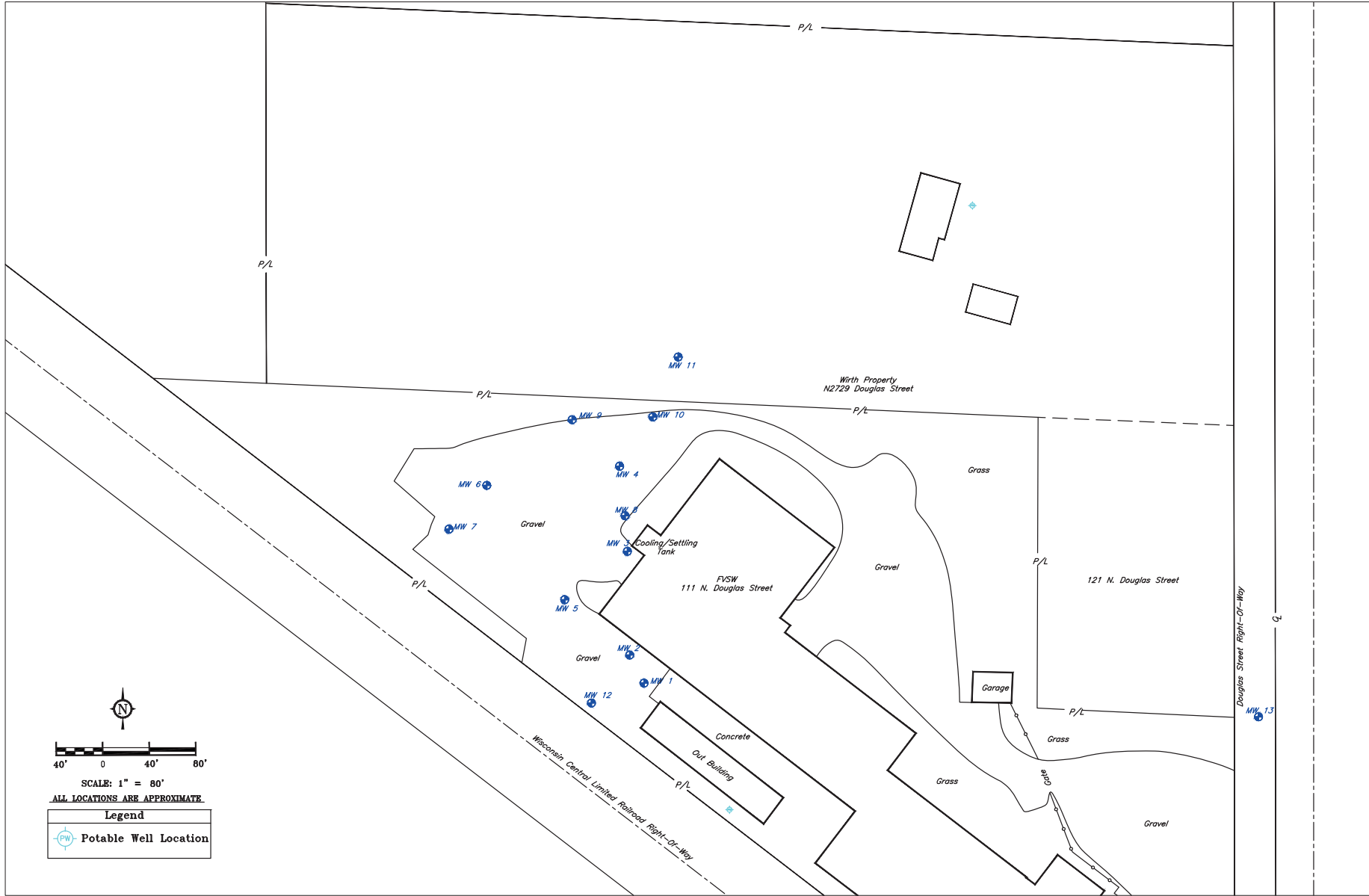


Figure B.1.b. Detailed Site Map

<b>Phase II Environmental Site Assessment</b> <b>Fox Valley Steel &amp; Wire</b> 111 N. Douglas Street Hortonville WI, 54944	
09014	DRAWN BY: MLD DATE: 2/12 DII: 09014plac
16237 W. Ryerson Road New Berlin, WI 53351 Tel: (262) 765-1447 • Fax: (262) 766-4466	
<b>United Engineering</b> <b>Consultants, Inc.</b>	

# B.1.c RR Site Map



## Legend

- Open Sites (ongoing cleanups)
- Open Sites (ongoing cleanups) - site boundaries shown
- Closed Sites (completed cleanups)
- Closed Sites (completed cleanups) - site boundaries shown
- County Boundary
- Railroads
- County Roads (WDOT)
- County Trunk Highway
- State and U.S. Highways (WDOT)
- State Trunk Highway
- US Highway
- Interstate Highways (WDOT)
- Interstate Highway
- Local Roads (WDOT)
- Civil Towns
- Civil Town
- 24K Open Water
- 24K Rivers and Shorelines
- Municipalities

Map created on Aug 22, 2013

Note: Not all RR Sites have been geo-located yet.



Scale: 1:13,693

This map is a user generated static output from an Internet mapping site and is for general reference only. Data layers that appear on this map may or may not be accurate, current, or otherwise reliable. THIS MAP IS NOT TO BE USED FOR NAVIGATION.

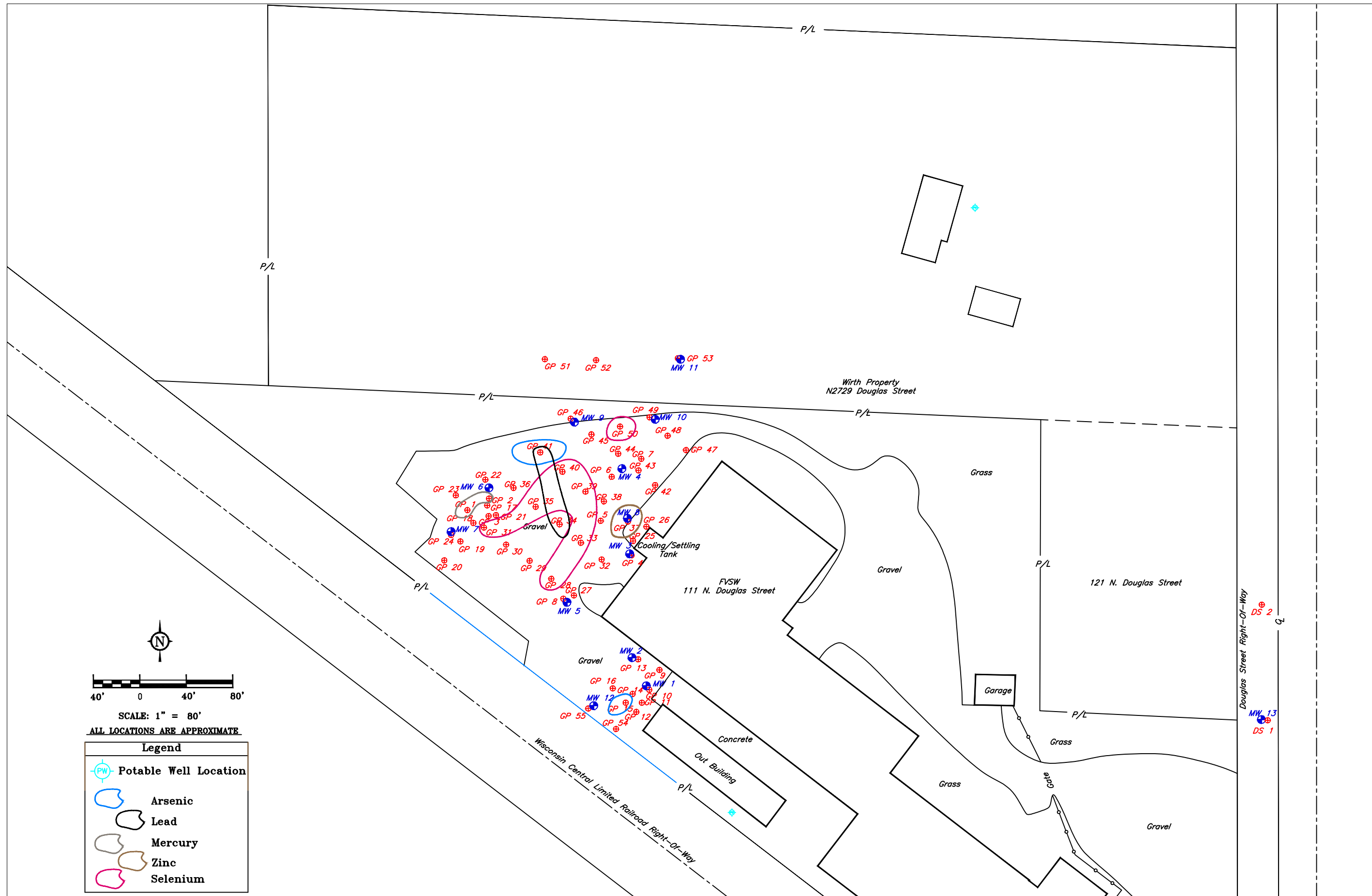


Figure B.2.a. Pre-remedial Soil Contamination

B.2.b Post-remedial Soil Contamination

Not Applicable

No remedy performed



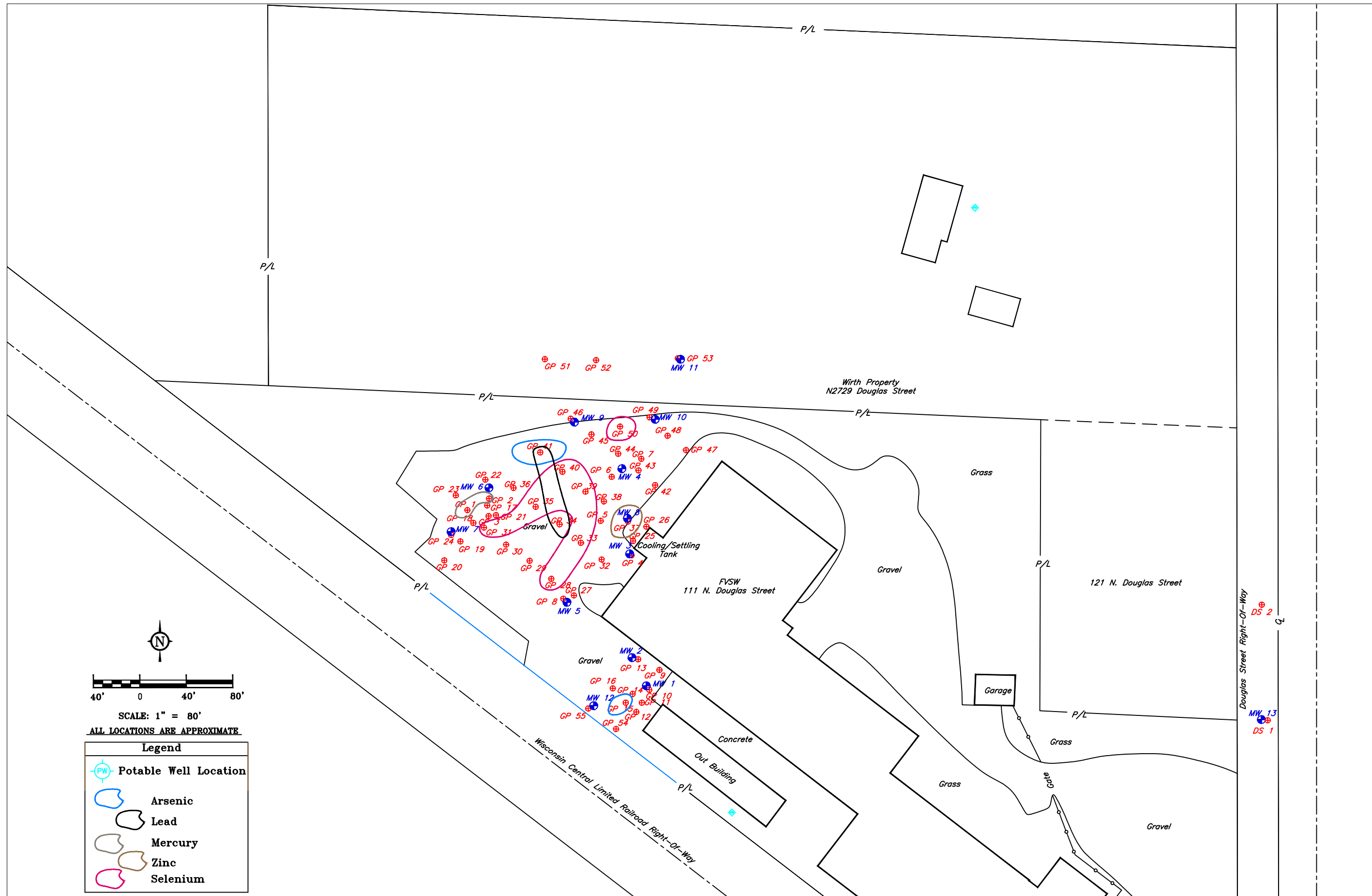


Figure B.2.c. Pre/Post Remaining Soil Contamination

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Consultants, Inc.**

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DATE: 2/12
ID#: 09014plot2

Phase II Environmental Site Assessment  
Fox Valley Steel & Wire  
111 N. Douglas Street Hortonville WI, 54944

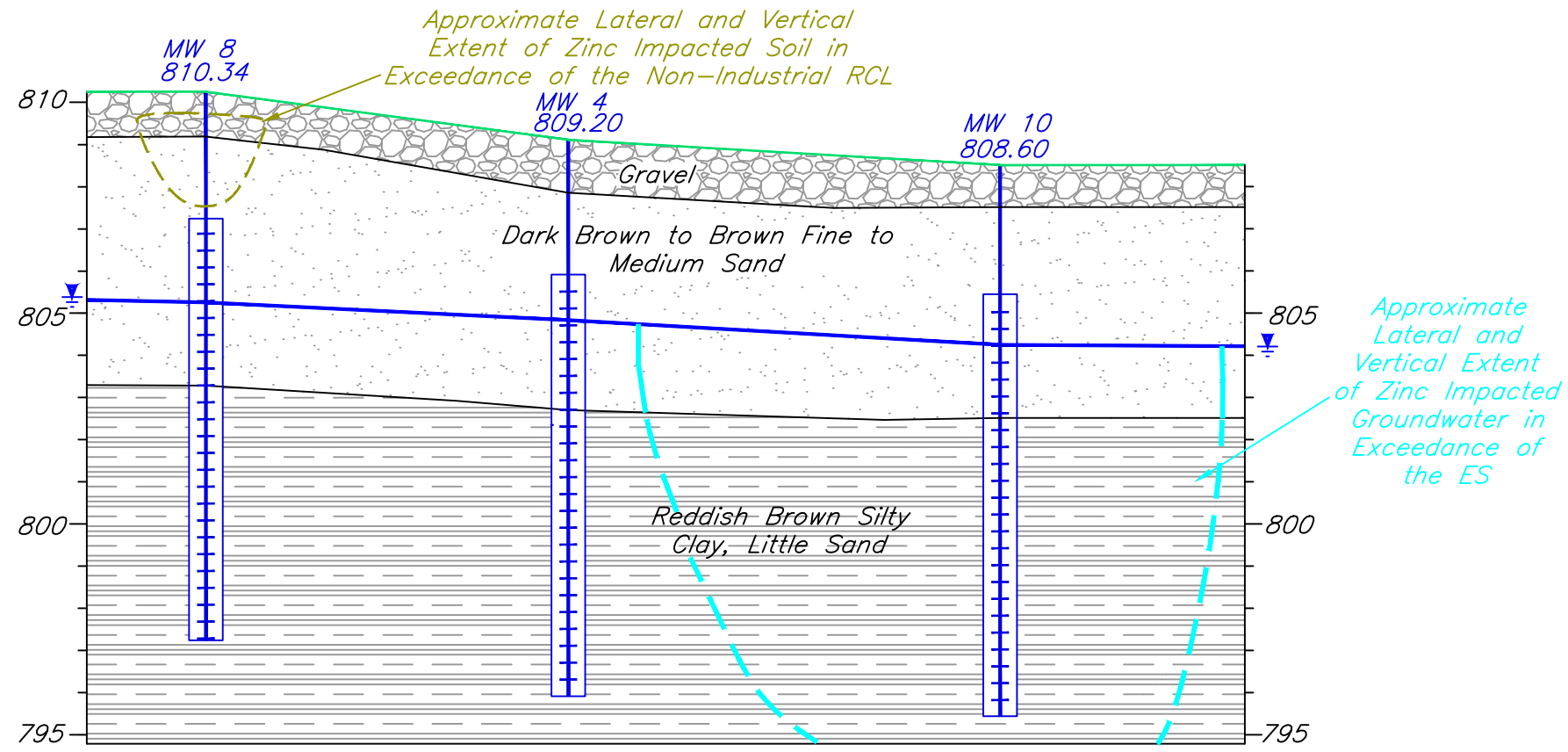
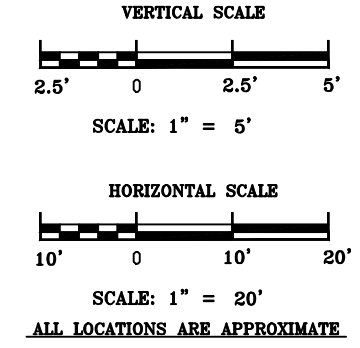
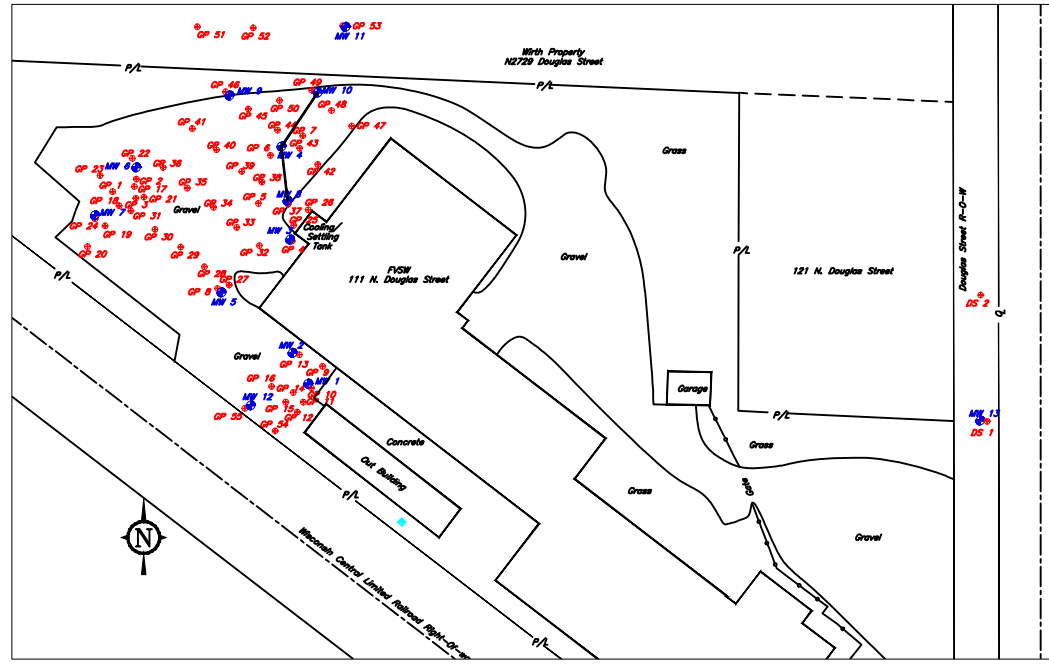


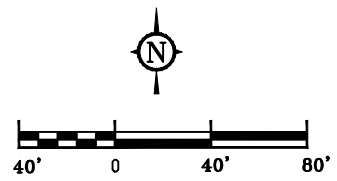
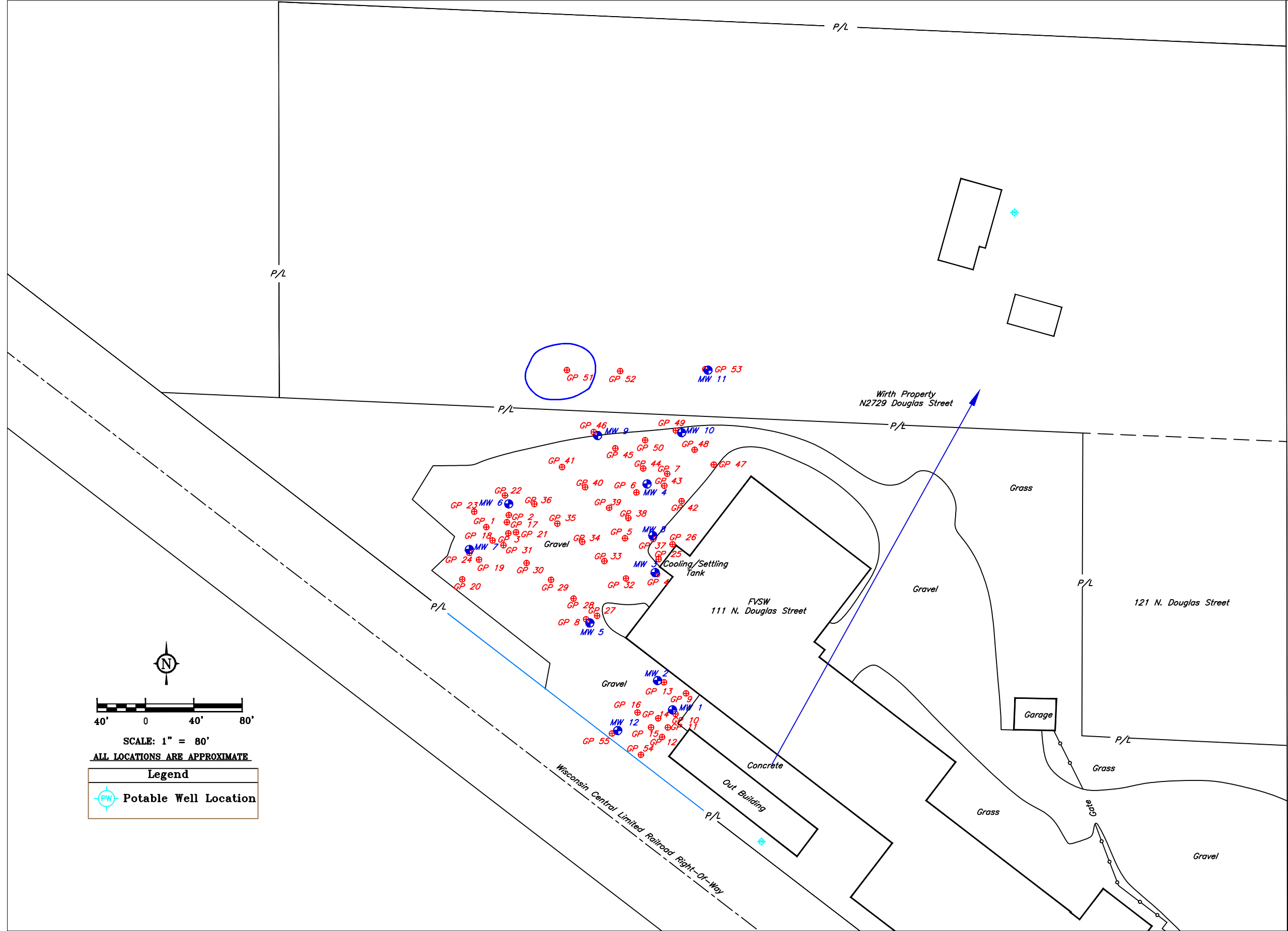
Figure B.3.a. Geologic Cross Section

Phase II Environmental Site Assessment  
 Fox Valley Steel & Wire  
 111 N. Douglas Street Hortonville WI 54944

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 ID#: 09014-sect2

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 New Berlin, WI 53151  
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SCALE: 1" = 80'  
 ALL LOCATIONS ARE APPROXIMATE

Legend	
	Potable Well Location

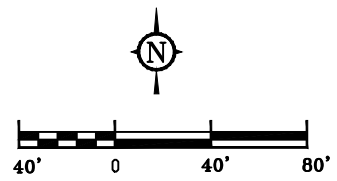
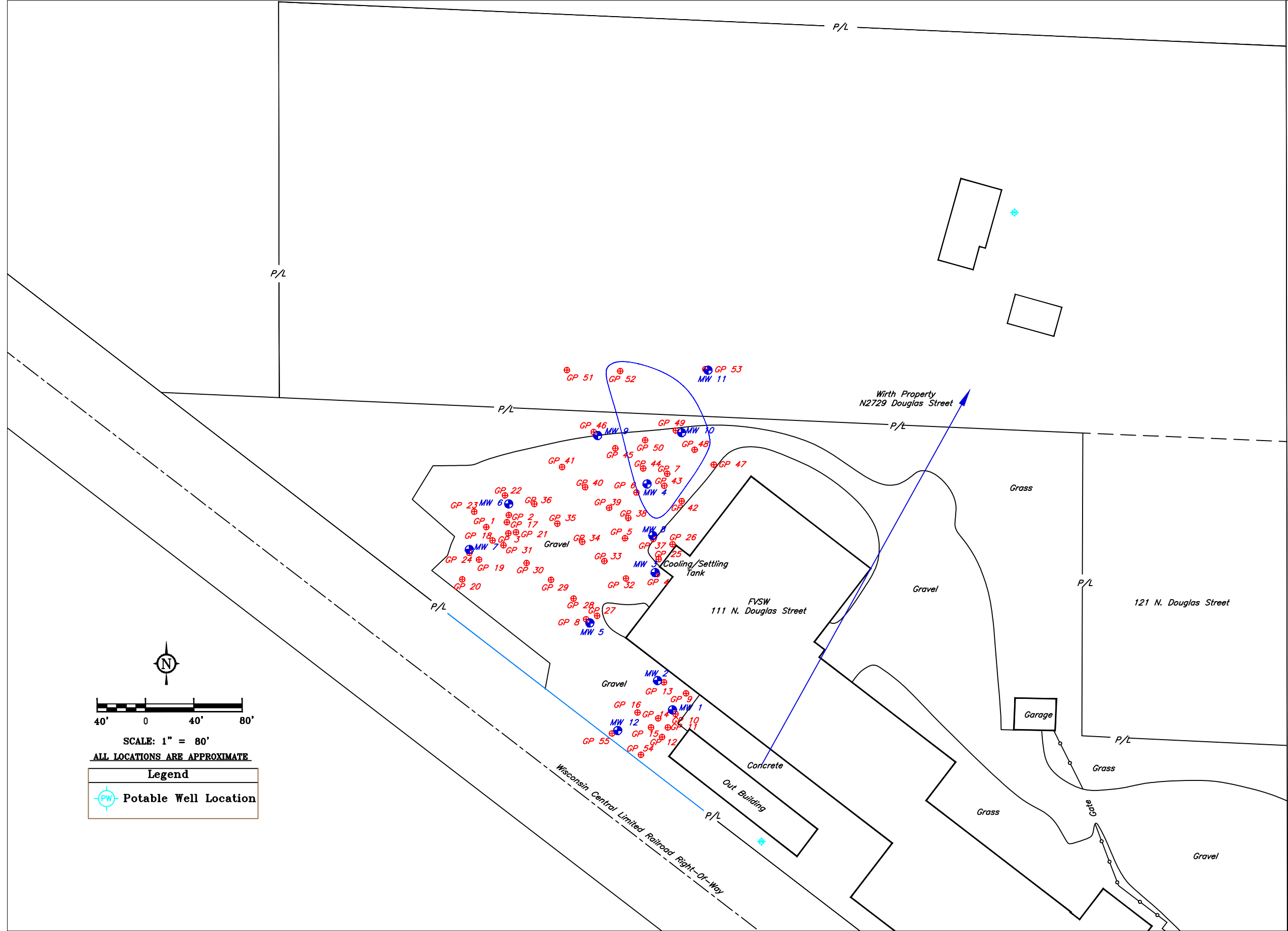
Figure B.3.b.(1) Approximate Lateral Extent of Chromium, Lead and Zinc Impacted Groundwater in Exceedance of the PAL as of October 10, 2012

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 ID#: 09014plot2

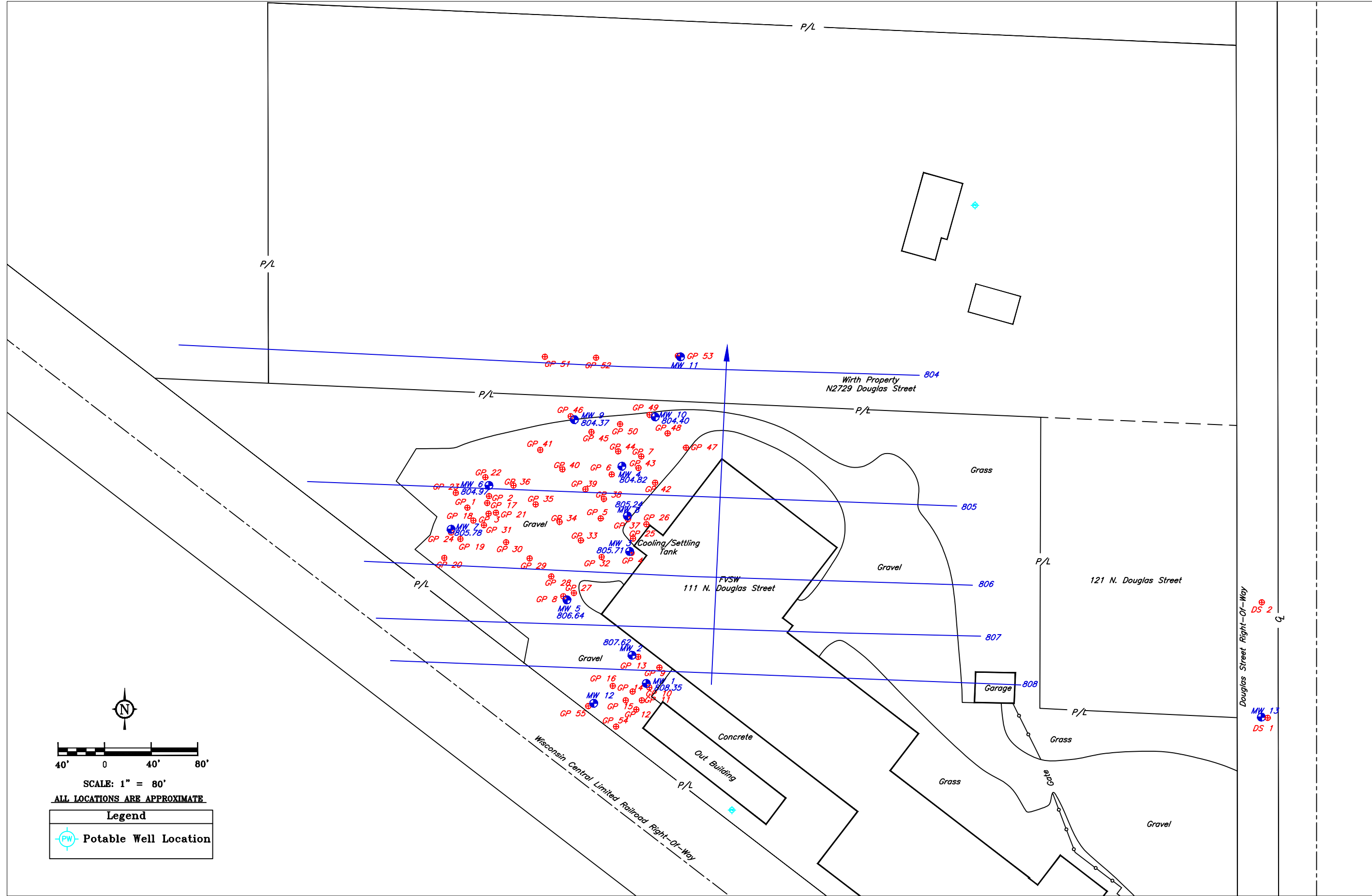
Phase II Environmental Site Assessment  
 Fox Valley Steel & Wire  
 111 N. Douglas Street Hortonville WI, 54944



SCALE: 1" = 80'  
 ALL LOCATIONS ARE APPROXIMATE

Legend	
	Potable Well Location

Figure B.3.b.(2) Approximate Lateral Extent of Zinc Impacted Groundwater in Exceedance of the ES as of October 10, 2012



SCALE: 1" = 80'

ALL LOCATIONS ARE APPROXIMATE

Legend

Potable Well Location

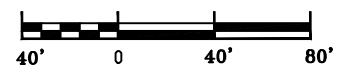
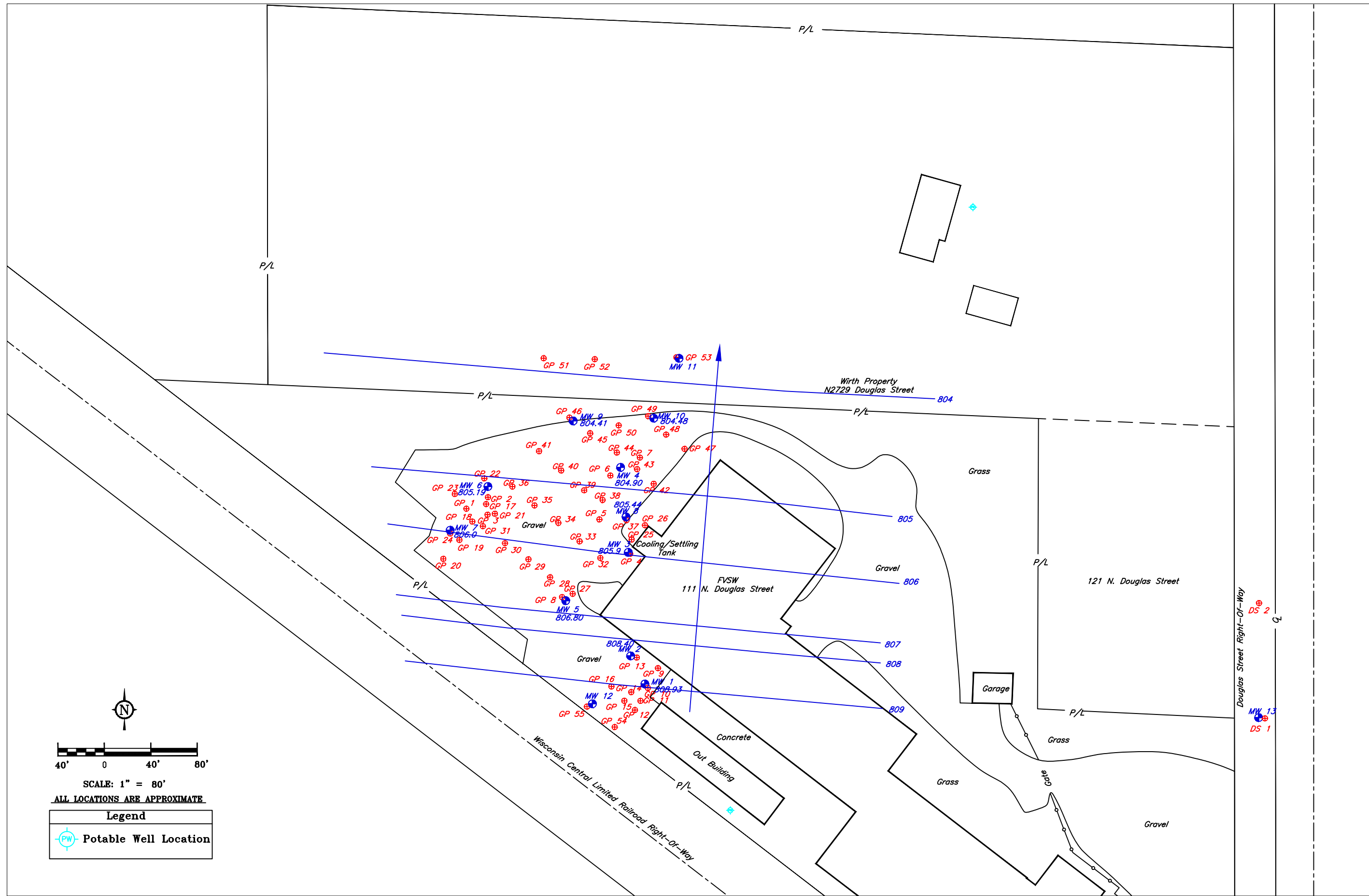
Figure B.3.c.(1) Groundwater Contour Map - November 2010

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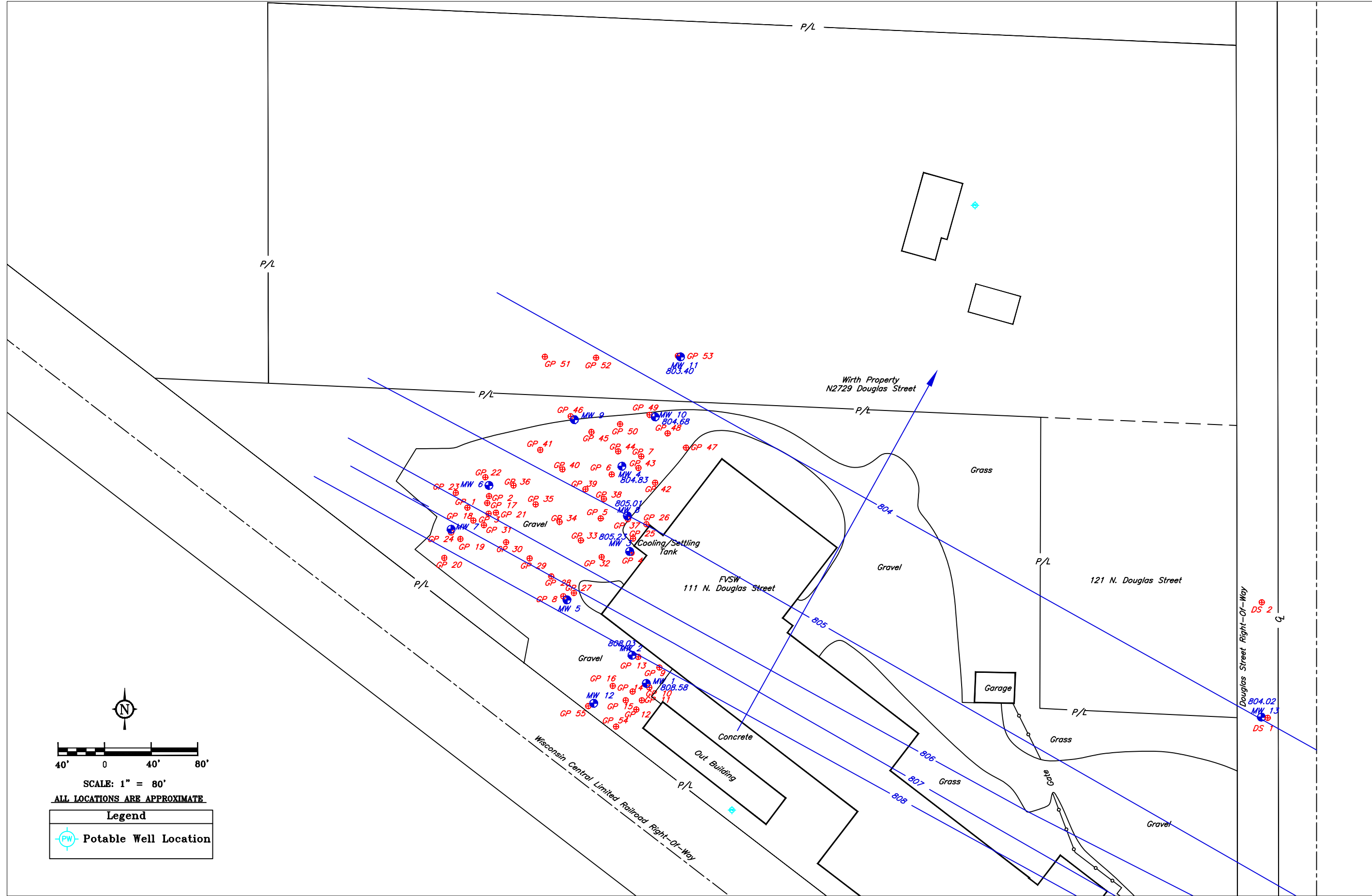
SCALE: 1" = 80'

ALL LOCATIONS ARE APPROXIMATE

Legend

Potable Well Location

Figure B.3.c.(2) Groundwater Contour Map - July 2011






  
  
 SCALE: 1" = 80'  
 ALL LOCATIONS ARE APPROXIMATE  
**Legend**  
 Potable Well Location

Figure B.3.c.(3) Groundwater Contour Map - April 2012

Note: Monitoring Wells  
PA-661 to PA-673  
are transferred to  
BRRTS #02-45-560221

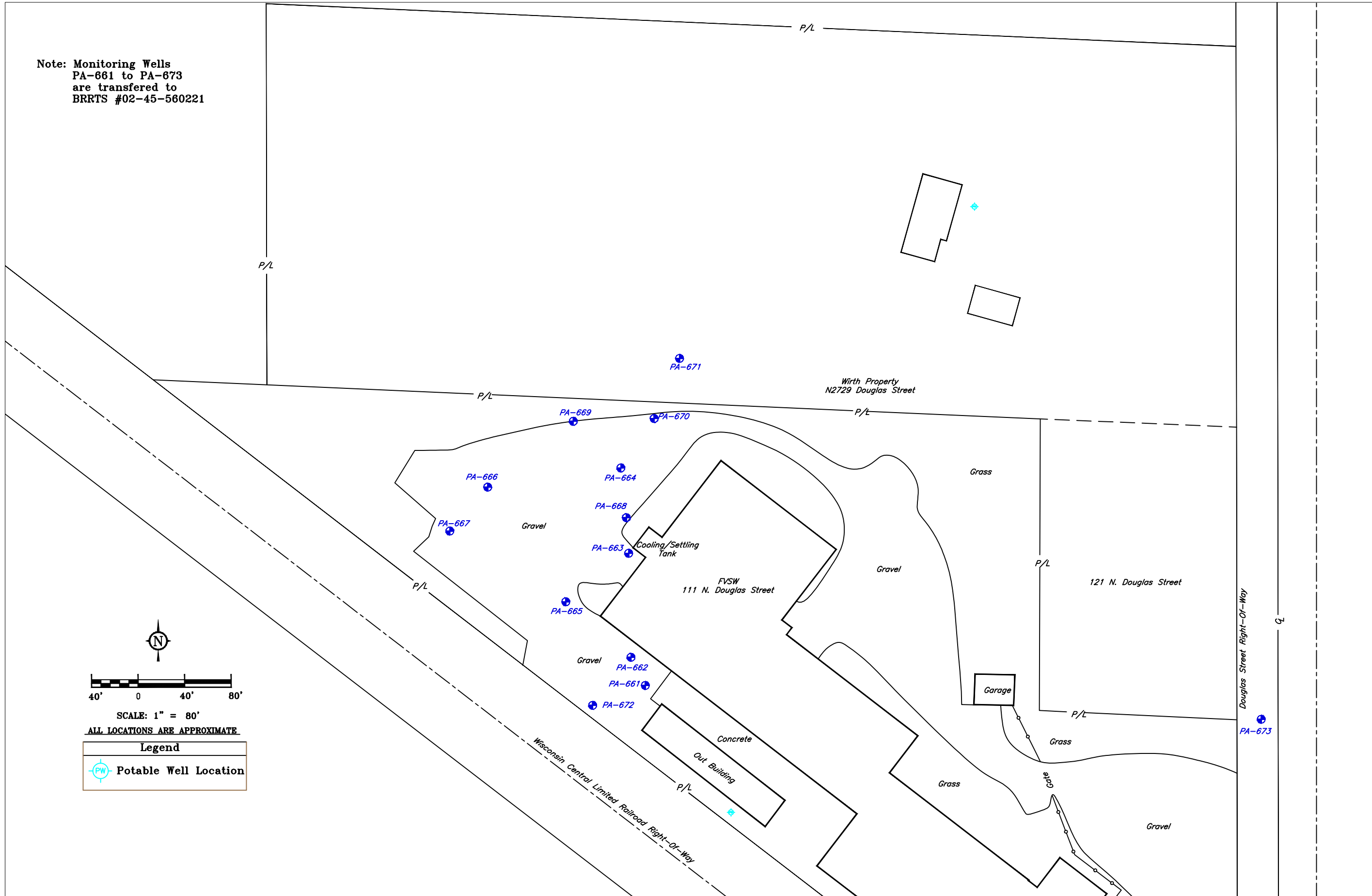


Figure B.3.d. Monitoring Wells

Phase II Environmental Site Assessment  
Fox Valley Steel & Wire  
111 N. Douglas Street Hortonville WI, 54944

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DRAWN BY: MLD  
DATE: 2/12  
ID#: 09014plot2

**United Engineering  
Consultants, Inc.**  
16237 W. Ryerson Road  
New Berlin, WI 53151  
Tel. (262) 785-1447 • FAX (262) 706-4400

#### B.4.a Vapor Intrusion Map

Not Applicable

Site investigation was limited to the analysis of RCRA metals, Zinc and total and amenable Cyanide. The analysis for the presence of Volatile Organic Compounds (VOC) was not required.

B.4.b Other Media of Concern

Not Applicable

Site investigation did not require the sampling or analysis of  
sediment or surface water



## Documentation of Remedial Action (Attachment C)

# DISCLAIMER

Documents contained in Attachment C of the Case Closure – GIS Registry (Form 4400-202) are not included in the electronic version (GIS Registry Packet) available on RR Sites Map to limit file size.

For information on how to obtain a copy or to review the file, please contact the Remediation & Redevelopment (RR) Environmental Program Associate (EPA) at [dnr.wi.gov/topic/Brownfields/Contact.html](http://dnr.wi.gov/topic/Brownfields/Contact.html)



**ATTACHMENT D – Maintenance Plan(s)**

D.1. Location map(s)

Not Applicable

Engineering control/cover or vapor intrusion system not required for site closure

D.2. Brief descriptions

Not Applicable

Engineering control/cover or vapor intrusion system not required for site closure

D.3. Description of maintenance action(s)

Not Applicable

Engineering control/cover or vapor intrusion system not required for site closure

D.4. Inspection log

Not Applicable

Engineering control/cover or vapor intrusion system not required for site closure

#### D.5. Contact Information

Not Applicable

Engineering control/cover or vapor intrusion system not required for site closure

**ATTACHMENT E – Monitoring Well Information**





**Keystone Consolidated Industries, Inc.**

Three Lincoln Centre  
5430 LBJ Freeway, Suite 1740  
Dallas, Texas 75240  
(972) 458-0028  
Fax (972) 448-1445

David C. Kilpatrick  
Associate General Counsel  
(972) 448-1411  
[dkilpatrick@valhi.net](mailto:dkilpatrick@valhi.net)

Via email and regular mail

June 25, 2013

Ms. Jennifer Borski  
Remediation and Redevelopment Program  
Wisconsin Department of Natural Resources  
625 E. County Road Y, STE. 700  
Oshkosh, WI 54901-9731

Re: WDNR BRRTS Site Name: Keystone Consolidated Industries, Inc.  
WDNR BRRTS Activity Number: 02-45-560221  
WDNR FID Number: 445031620

Dear Ms. Borski:

Please be advised that Keystone Consolidated Industries, Inc. ("Keystone") has been in discussions with Tim Anderson of United Engineering Consultants, Inc. in regard to the existing monitoring well network located on Keystone's 111 North Douglas St. Hortonville, WI, property that was installed under WDNR site: Fox Valley Steel & Wire for WDNR BRRTS #02-45-553699. Keystone is in agreement to accept maintenance and abandonment responsibility of the existing monitoring well network as a part of our site investigation. If you require anything else, please let me know.

Regards,

David C. Kilpatrick  
Associate General Counsel

DCK/gw



April 11, 2013

Mr. and Mrs. Rick and Lisa Wirth  
115 N. Douglas Street  
Hortonville, Wisconsin 54944

Dear Rick and Lisa:

Groundwater contamination which appears to have originated on the property located at 111 N. Douglas Street may have migrated onto your property at 115 N. Douglas Street. While analysis of groundwater samples collected from a monitoring well (MW-11) on your property did not indicate the presence of Zinc at a concentration above the State of Wisconsin groundwater public welfare Enforcement Standard (ES) established in chapter NR 140 of the Wisconsin Administrative Code, an interpolated Zinc plume extends onto your property. As per the Wisconsin Administrative Code, this interpolated plume extends halfway between a monitoring well (MW-10) with documented Zinc concentrations in excess of the ES (5.0 mg/L) on the 111 North Douglas property and MW-11 on your property. If no further Zinc analysis is performed, the concentration of Zinc in the groundwater on your property must be stated to be above the ES.

The ES for Zinc is a secondary standard, as Zinc is not known to cause adverse health effects. Instead, secondary standards address contaminants which may have an effect on the aesthetic quality of drinking water relating to color, odor or taste. It should be noted, the analysis of a groundwater sample collected from the potable well at your property did not indicate the presence of Zinc at a concentration in excess of the ES or the Preventive Action Limit (PAL) of 2.5 mg/L.

The environmental consultant investigating the Zinc contamination has informed us that the groundwater Zinc plume is stable or receding and will naturally degrade over time. I believe that allowing natural attenuation by dispersion to complete the remediation at this site will meet the requirements for case closure which are found in chapter NR 726 of the Wisconsin Administrative Code, and I will be requesting that the Department of Natural Resources (WDNR) accept natural attenuation by dispersion as the final remedy for this site and grant case closure. Closure means that the WDNR will not be requiring any further investigation or remedial action to be taken, other than the reliance on natural attenuation by dispersion.

Since the source of the groundwater contamination is not on your property, neither you nor any subsequent owner of your property will be held responsible for investigation or remediation of this groundwater contamination, as long as you and any subsequent owner(s) comply with the requirements of section 292.13, Wisconsin Statutes, including allowing access to your property for environmental investigation or remediation if access is required. To obtain a copy of the Department of Natural Resources' publication #RR-589, Fact Sheet 10: Guidance for Dealing with Properties Affected by Off-Site Contamination," you may visit <http://www.dnr.wi.gov/org/aw/rr/archives/pubs/RR589.pdf>.

The WDNR will not review our closure request for at least thirty (30) days after the date of this letter. As an affected property owner, you have a right to contact the WDNR to provide any technical information that you may have that indicates that closure should not be granted for this site. If you would like to submit any information to the WDNR that is relevant to this closure request, you should mail that information to: Ms. Jennifer Borski at the WDNR Oshkosh Service Center located at 625 E County Road Y, Suite 700 Oshkosh, WI 54901.

If this case is closed, all properties within the site boundaries where groundwater contamination exceeds chapter NR 140 groundwater enforcement standards will be listed on the WDNR Geographic Information System (GIS) Registry of Closed Remediation Sites. The information on the GIS Registry includes maps showing the location of properties in Wisconsin where groundwater contamination above chapter NR 140 enforcement standards was found at the time that the case was closed. This GIS Registry will be available to the general public on the WDNR internet web site. Please review the following legal description of your property, and notify me within the next thirty (30) days if the legal description is incorrect.

CSM 4223 LOT 1 (PLATTED OUT OF PRT SW NW SEC35-22-15) 6.25AC M/L.

Once the WDNR makes a decision on my closure request, it will be documented in a letter. If the WDNR grants closure, you may obtain a copy of this letter by requesting a copy from us, by writing to the agency address given above or by accessing the DNR GIS Registry of Closed Remediation Sites on the internet at <http://www.dnr.wi.gov/org/aw/rr/gis/index.htm>. A copy of the closure letter is included as part of the site file on the GIS Registry of Closed Remediation Sites.

Should you or any subsequent property owner wish to construct or reconstruct a well on your property, special well construction standards may be necessary to protect the well from the possibility of residual Zinc impacted groundwater. Any well driller who proposes to construct a well on your property in the future will first need to obtain approval from a regional water supply specialist in DNR's Drinking Water and Groundwater Program. The well construction application, form 3300-254, is on the internet at <http://www.dnr.wi.gov/org/water/dwg/3300254.pdf>, or may be accessed through the GIS Registry web address in the preceding paragraph.

If you need more information, you may contact United Engineering Consultants Inc. via mail at 16237 W. Ryerson Road, New Berlin, WI 53151 or via telephone at 262-785-1447 or you may contact Ms. Jennifer Borski of the WDNR at 920-424-7887.

Sincerely,  
Fox Valley Steel & Wire

A handwritten signature in cursive script, appearing to read "Jim Monroe", written in black ink.

Jim Monroe  
President



# Track & Confirm

OFFER MAIL UPDATES PRINT DETAILS

YOUR LABEL NUMBER	SERVICE	STATUS OF YOUR ITEM	DATE & TIME	LOCATION	FEATURES
70111570000121625690	First-Class Mail®	Delivered	April 15, 2013, 10:11 am	APPLETON, WI 54911	Expected Delivery By: April 16, 2013 Certified Mail™
		Dispatched to Sort Facility	April 15, 2013, 4:23 pm	HORTONVILLE, WI 54944	
		Acceptance	April 15, 2013, 11:34 am	HORTONVILLE, WI 54944	

7011 1570 0001 2162 5690

**U.S. Postal Service™**  
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(Domestic Mail Only; No Insurance Coverage Provided)

For delivery information visit our website at [www.usps.com](http://www.usps.com).

OFFICIAL USE

Postage	\$0.45	0961
Certified Fee	\$3.10	04
Return Receipt Fee (Endorsement Required)	\$0.00	
Restricted Delivery Fee (Endorsement Required)	\$0.00	
<b>Total Postage &amp; Fees</b>	<b>\$3.56</b>	

Sent to: *Rick Wirth*  
*Graphic Finishing*

Street, Apt. No., or PO Box No. *221 E Atlantic St*

City, State, ZIP+4® *Appleton WI 54911*

PS Form 3800, August 2008 See Reverse for Instructions



HORTONVILLE MPO  
HORTONVILLE, Wisconsin  
549449378  
5654840961 -0098  
04/15/2013 (920)779-6888 11:34:56 AM

Product Description	Sale Qty	Unit Price	Final Price
APPLETON WI 54911 Zone-1 First-Class Letter			\$0.46
0.80 oz. Expected Delivery: Tue 04/16/13			
00 Certified			\$3.10
Label #: 70111570000121625690			
Issue PVI:			\$3.56

Total: \$3.56

Paid by: Cash \$3.56

Bill #: 1000202325832  
Clerk: 04

All sales final on stamps and postage  
Refunds for guaranteed services only  
Thank you for your business

\*\*\*\*\*  
HELP US SERVE YOU BETTER

Go to: <https://postalexperience.com/Pos>

TELL US ABOUT YOUR RECENT  
POSTAL EXPERIENCE

YOUR OPINION COUNTS  
\*\*\*\*\*

Customer Copy



August 8, 2013

Attorney David Kilpatrick – Associate General Counsel  
Keystone Consolidated Industries  
Three Lincoln Centre  
5430 LBJ Freeway, Suite 1740  
Dallas, Texas 75240

Dear Attorney Kilpatrick:

This letter is in regards to the investigation of a release of Zinc at Fox Valley Steel and Wire located at 111 N. Douglas Street in Hortonville, Wisconsin. The results of the site investigation indicate that Zinc impacted soil and groundwater remains on your property. I will be requesting that the Wisconsin Department of Natural Resources (WDNR) accept natural attenuation by dispersion of the Zinc impacted groundwater as the final remedy for this site and grant case closure. Case closure means that the WDNR will not be requiring any further investigation or remedial action other than the reliance on natural attenuation of the groundwater by dispersion.

If this case is closed, all properties within the site boundaries where groundwater contamination exceeds chapter NR 140 groundwater enforcement standards will be listed on the WDNR Geographic Information System (GIS) Registry of Closed Remediation Sites. The information on the GIS Registry includes maps indicating the location of properties in Wisconsin where groundwater contamination above chapter NR 140 enforcement standards was found at the time that the case was closed. This GIS Registry will be available to the general public on the WDNR internet web site.

Please review the following legal description of your property and notify me within the next thirty (30) days if the legal description is incorrect.

**The East 200 feet of the north 247 feet of the Northwest ¼ of the Southwest ¼ of Section 35, Township 22 North, Range 15 East, Village of Hortonville, Outagamie County, Wisconsin.**

With regard to the soil at the property, residual Zinc contamination currently remains on this property at concentrations which do not exceed the NR 720 industrial soil standard but exceed the non-industrial soil standard. Under s. 292.12 (2) (c), Wis. Stats., the property may not be used or developed for residential, commercial, agricultural or other non-industrial uses unless at the time the non-industrial use is proposed, an investigation is conducted to determine the degree and extent of the remaining Zinc contamination and/or remedial action is taken to meet the non-industrial soil remediation standard. You will need to notify the WDNR prior to changing the use of this property from industrial to non-industrial to determine the need for any additional remedial action.

Before I request case closure, I will need to inform the WDNR as to who will be responsible for the above referenced continuing obligation on your property. Under section 292.12, Wis. Stats., the responsibility for maintaining all necessary continuing obligations for your property will fall on you or any subsequent property owner. Please notify any current and future occupant(s) by supplying them with a copy of this letter.

The WDNR will not review our closure request for at least thirty (30) days after the date of this letter. As an affected property owner, you have a right to contact the WDNR to provide any technical information that you may have that indicates that closure should not be granted for this site. If you would like to submit any information to the WDNR that is relevant to this closure request, you should mail that information to: Ms. Jennifer Borski at the WDNR Oshkosh Service Center located at 625 E County Road Y, Suite 700 Oshkosh, WI 54901.

Once the WDNR makes a decision on my closure request, it will be documented in a letter. If the WDNR grants closure, you may obtain a copy of this letter by requesting a copy from us, by writing to the agency address given above or by accessing the DNR GIS Registry of Closed Remediation Sites on the internet at <http://www.dnr.wi.gov/org/aw/rr/gis/index.htm>. A copy of the closure letter is included as part of the site file on the GIS Registry of Closed Remediation Sites.

Should you or any subsequent property owner wish to construct or reconstruct a well on your property, special well construction standards may be necessary to protect the well from the possibility of residual Zinc contamination. Any well driller who proposes to construct a well on your property in the future will first need to obtain approval from a regional water supply specialist in DNR's Drinking Water and Groundwater Program. The well construction application, form 3300-254, is on the internet at <http://www.dnr.wi.gov/org/water/dwg/3300254.pdf>, or may be accessed through the GIS Registry web address in the preceding paragraph.

If you need more information, you may contact United Engineering Consultants Inc. via mail at 16237 W. Ryerson Road, New Berlin, WI 53151 or via telephone at 262-785-1447 or you may contact Ms. Jennifer Borski of the WDNR at 920-424-7887.

Sincerely,  
Fox Valley Steel & Wire



Jim Monroe  
President



Jim -

I sent this on Friday to Atty Kilpatrick.  
It is expected to arrive on Monday.  
I also attached a signature card  
which will be returned to me

7012 2920 0001 5102 8468

U.S. Postal Service™  
**CERTIFIED MAIL™ RECEIPT**  
(Domestic Mail Only; No Insurance Coverage Provided)

For delivery information visit our website at [www.usps.com](http://www.usps.com)®  
DALLAS TX 75240

Postage	\$	1.52	0278
Certified Fee		3.10	
Return Receipt Fee (Endorsement Required)		2.55	
Restricted Delivery Fee (Endorsement Required)		0.00	
Total Postage & Fees	\$	7.17	

7012 2920 0001 5102 8468

Postmark Here  
AUG 16 2013  
GREEN BAY WI 54324  
RD STATE ST

Sent To **Atty David Kilpatrick-Keystone**  
Street, Apt. No., or PO Box No. **Three Lincoln Centre**  
**5430 LBJ Freeway, Suite 1740**  
City, State, ZIP+4 **Dallas, TX 75240**

PS Form 3800, August 2006 See Reverse for Instructions

after the letter is signed for. I  
will e-mail you a scanned copy  
once I receive it.

Also enclosed - copy of signed  
letter.  
(Carbon)

P.S. Jim told me that Keystone will waive  
the 30 day period. Good.



**Keystone Consolidated Industries, Inc.**

Three Lincoln Centre  
5430 LBJ Freeway, Suite 1740  
Dallas, Texas 75240  
(972) 458-0028  
Fax (972) 448-1445

David C. Kilpatrick  
Associate General Counsel  
(972) 448-1411  
[dkilpatrick@valhi.net](mailto:dkilpatrick@valhi.net)

August 27, 2013

Tim J. Anderson, P.E.  
United Engineering Consultants, Inc.  
16237 W. Ryerson Road  
New Berlin, WI 53151

Re: Fox Valley Closure

Dear Tim:

I act as in-house counsel for Keystone Consolidated Industries, Inc. ("Keystone") and I confirm receipt of Jim Monroe's August 8, 2013 letter to me, describing the steps Fox Valley is taking to close the Wisconsin Department of Natural Resources ("WDNR") Inc. investigation.

Please be advised that as requested in Mr. Monroe's letter, I reviewed the legal description purported to be for 111 N. Douglas Street, Hortonville, WI and it is not correct. The correct legal description is as follows:

*Legal Description:*

ALL THAT PART OF THE NORTHWEST ¼ OF THE SOUTHWEST ¼ OF SECTION THIRTY-FIVE (35), TOWNSHIP TWENTY-TWO (22) NORTH, RANGE FIFTEEN (15) EAST, LYING NORTH OF THE RIGHT-OF-WAY OF THE CHICAGO AND NORTHWESTERN RAILROAD COMPANY, VILLAGE OF HORTONVILLE, OUTAGAMIE COUNTY, WISCONSIN.

LESS AND EXCEPTING LANDS CONVEYED TO STATE OF WISCONSIN, DEPARTMENT OF TRANSPORTATION IN JACKET 6737, IMAGE 37, AS DOCUMENT NO. 894927.

DESCRIBED AS FOLLOWS:

ALL THAT LAND OF THE OWNER IN THE NW1/4-SW1/4 SECTION 35, T22N, R15E, LYING WITHIN THE FOLLOWING DESCRIBED TRAVERSE:

COMMENCING AT THE WEST ONE-QUARTER CORNER OF SAID SECTION 35; THENCE ALONG THE WEST SECTION LINE S00° 55'19"E 638.47 FEET TO A POINT ON A CURVE WITH A RADIUS AT SAID POINT BEARING S5° 38'53"W 34,377.47 FEET; THENCE EASTERLY ALONG SAID CURVE TO THE RIGHT AND ALONG THE USH 45 REFERENCE LINE 81.79 FEET; THENCE S84° 12'56"E 1163.90 FEET TO THE POINT OF BEGINNING; THENCE N05° 47'04"E 100.00 FEET; THENCE S84° 12'56"E 84.42 FEET; THENCE S00° 47'56"E 100.66 FEET TO SAID REFERENCE LINE; THENCE ALONG SAID LINE N84° 12'56"W 95.96 FEET TO THE POINT OF BEGINNING.

FURTHER LESS AND EXCEPTING LANDS CONVEYED BY WARRANTY DEED RECORDED IN DOCUMENT NO. 1550727. DESCRIBED AS FOLLOWS:

THE EAST 200 FEET OF THE NORTH 247 FEET OF THE NW ¼ OF THE SW ¼, SECTION 35, TOWNSHIP 22 NORTH, RANGE 15 EAST, VILLAGE OF HORTONVILLE, OUTAGAMIE COUNTY, WISCONSIN.

Letter to Tim J. Anderson, P.E.  
August 27, 2013  
Page 2

TAX KEY NO. 240 031100

SAID PARCEL CONTAINS 278,643 SQUARE FEET (6.3968 ACRES) OF LAND TOTAL AND 265,798 SQUARE FEET (6.1019 ACRES) OF LAND USABLE MORE OR LESS.

Further, it is my understanding from Mr. Monroe's August 8 letter that Keystone has thirty (30) days after receipt to review your closure plan. Please be advised that Keystone agrees to waive this 30 day period.

Please let me know if you have any further questions or concerns.

Regards,



David C. Kilpatrick  
Associate General Counsel

DCK/gw

## G.1. Deeds – Source Property and Other Impacted Properties

VOL 354 PAGE 117

This Indenture, Made by Victor Schwebs and Alice Schwebs, his wife,

grantors of Hortonville, Outagamie County, Wisconsin, hereby convey  
and warrant to ~~W. J. Schaefer~~ Wire Products, Inc.

grantee of Chicago, Cook Illinois  
County, Wisconsin, for  
the sum of One Dollar (\$1.00) and other valuable consideration  
the following tract of land in Outagamie County, State of Wisconsin;

-----A parcel of land containing 6.64 acres in the Northwest Quarter of  
the Southwest Quarter of Section 35, Township 22 North, Range 15  
East, Village of Hortonville, Outagamie County, Wisconsin, described  
as follows: Beginning at an iron stake in the east and west quarter  
section line and 200 feet West from the Northeast corner of the  
Northwest Quarter of the Southwest Quarter of said Section 35; thence  
West on said quarter section line 771.2 feet to the northerly line  
of the right of way of the C. and N. W. Rys Company; thence South-  
easterly on the northerly line of said right of way 1203 feet to  
the east line of the Northwest quarter of the said Southwest quarter;  
thence north on said east line 440 feet more or less to a point that  
is 247 feet South of the quarter Section line; thence West and  
parallel to the quarter section line 200 feet to an iron stake;  
thence North 247 feet to an iron stake on the quarter section line  
and the place of beginning.-----

for 275



In Witness Whereof, the said grantors have hereunto set their hands and seals this  
22nd day of January, A. D., 19 48.

Signed and Sealed in Presence of

Victor Schwebs (Seal)  
Victor Schwebs  
Alice Schwebs (Seal)  
Alice Schwebs  
Francis A. Werner (Seal)  
M.F. Ziehm (Seal)

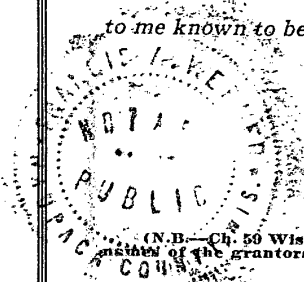
State of Wisconsin,  
Outagamie County } ss.

Personally came before me, this 22<sup>nd</sup> day of January, A. D., 19 48,  
the above named Victor Schwebs and Alice Schwebs, his wife,

to me known to be the persons who executed the foregoing instrument and acknowledged the same.

Francis A. Werner

Notary Public, Waupaca County, Wis.  
My Commission expires July 15, A. D., 19 51.



110316

No. ....

Victor Schwabs and Wife.....

Hortonville, Wisconsin.....

To

WEE PRODUCTS, INC.....

Chicago, Illinois.....

WARRANTY DEED

REGISTRAR'S OFFICE,

State of Wisconsin,

OUTAGAMIE County,

Received for Record this 30 day of

Aug, 1978

at 9 o'clock P.M., and recorded in

Vol. 354 of Deeds on page 117

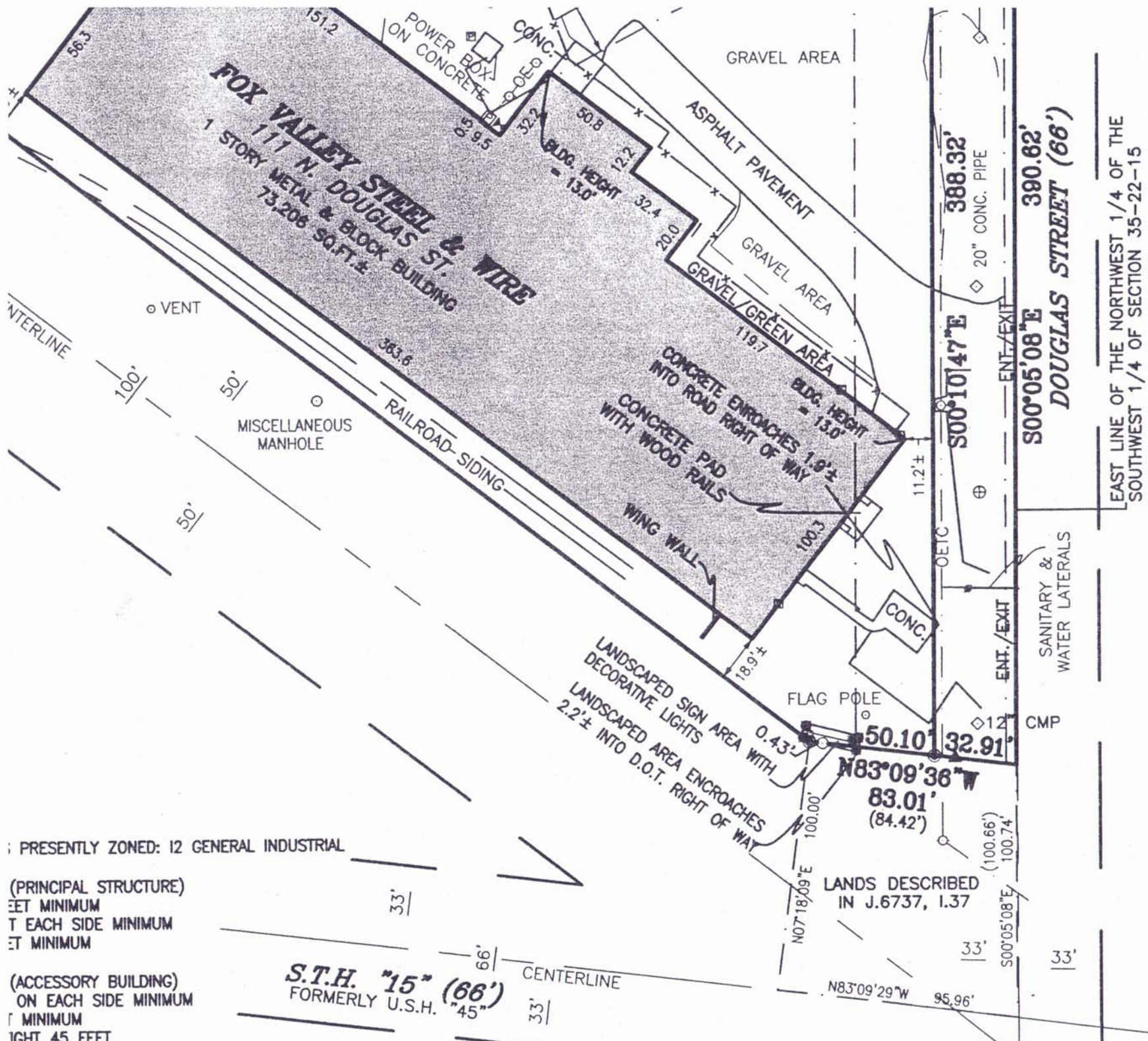
*B.H. Register of Deeds.*

Register of Deeds.

Deputy.

*J. W. ...*





PRESENTLY ZONED: I2 GENERAL INDUSTRIAL

(PRINCIPAL STRUCTURE)  
 SET MINIMUM  
 T EACH SIDE MINIMUM  
 ET MINIMUM

(ACCESSORY BUILDING)  
 ON EACH SIDE MINIMUM  
 T MINIMUM  
 IGH 45 FEET

**S.T.H. "15" (66')**  
 FORMERLY U.S.H. "45"

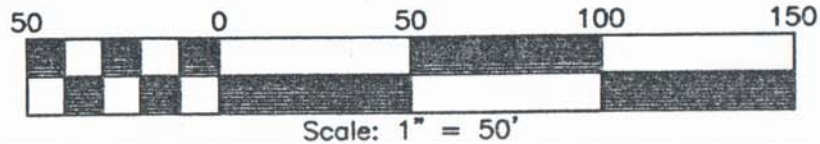
DESIGNER	DRAWN	CHECKED	TTT
	RDD	CHECKE	
<b>UNITED ENGINEERING CONSULTANTS, INC.</b>			
ATTENTION: TIM ANDERSON 10617 W. OKLAHOMA AVE., SUITE L2 WEST ALLIS, WISCONSIN 53227			
SCALE	DATE	PROJECT NO.	
1" = 50'	10-26-10	B838.39-10	
SHEET NO.			



- = SIGN
- ⊗ = TREE
- = METAL POST
- ⊠ = METAL POST
- x- = 6' WIRE FENCE
- ( ) = RECORDED AS
- OE = OVERHEAD ELECTRICAL
- OT = OVERHEAD TELEPHONE
- OC = OVERHEAD CABLE TV
- OTC = OVERHEAD TELEPHONE & CABLE TV
- OET = OVERHEAD ELECTRICAL & TELEPHONE
- OETC = OVERHEAD ELECTRICAL, TELEPHONE & CABLE TV
- GP = GEO PROBE
- MW = MONITORING WELL



NORTH IS REFERENCED TO THE NORTH LINE OF THE SOUTHWEST 1/4 OF SECTION 35, TOWNSHIP 22 NORTH, RANGE 15 EAST, VILLAGE OF HORTONVILLE, OUTAGAMIE COUNTY, WISCONSIN, WHICH BEARS S87°31'53"E PER THE OUTAGAMIE COUNTY COORDINATE SYSTEM.



LEGAL DESCRIPTION:

ALL THAT PART OF THE NORTHWEST 1/4 OF THE SOUTHWEST 1/4 OF SECTION THIRTY-FIVE (35), TOWNSHIP TWENTY-TWO (22) NORTH, RANGE FIFTEEN (15) EAST, LYING NORTH OF THE RIGHT-OF-WAY OF THE CHICAGO AND NORTHWESTERN RAILROAD COMPANY, VILLAGE OF HORTONVILLE, OUTAGAMIE COUNTY, WISCONSIN.

LESS AND EXCEPTING LANDS CONVEYED TO STATE OF WISCONSIN, DEPARTMENT OF TRANSPORTATION IN JACKET 6737, IMAGE 37, AS DOCUMENT NO. 894927.

DESCRIBED AS FOLLOWS:

ALL THAT LAND OF THE OWNER IN THE NW1/4-SW1/4 SECTION 35, T22N, R15E, LYING WITHIN THE FOLLOWING DESCRIBED TRAVERSE:  
 COMMENCING AT THE WEST ONE-QUARTER CORNER OF SAID SECTION 35; THENCE ALONG THE WEST SECTION LINE S00°55'19"E 638.47 FEET TO A POINT ON A CURVE WITH A RADIUS AT SAID POINT BEARING S5°38'53"W 34,377.47 FEET; THENCE EASTERLY ALONG SAID CURVE TO THE RIGHT AND ALONG THE USH 45 REFERENCE LINE 81.79 FEET; THENCE S84°12'56"E 1163.90 FEET TO THE POINT OF BEGINNING; THENCE N05°47'04"E 100.00 FEET; THENCE S84°12'56"E 84.42 FEET; THENCE S00°47'56"E 100.66 FEET TO SAID REFERENCE LINE; THENCE ALONG SAID LINE N84°12'56"W 95.96 FEET TO THE POINT OF BEGINNING.

FURTHER LESS AND EXCEPTING LANDS CONVEYED BY WARRANTY DEED RECORDED IN DOCUMENT NO. 1550727. DESCRIBED AS FOLLOWS:

THE EAST 200 FEET OF THE NORTH 247 FEET OF THE NW 1/4 OF THE SW 1/4, SECTION 35, TOWNSHIP 22 NORTH, RANGE 15 EAST, VILLAGE OF HORTONVILLE, OUTAGAMIE COUNTY, WISCONSIN.

TAX KEY NO. 240 031100

SAID PARCEL CONTAINS 278,643 SQUARE FEET (6.3968 ACRES) OF LAND TOTAL AND 265,798 SQUARE FEET (6.1019 ACRES) OF LAND USABLE MORE OR LESS.

<u>MONITORING WELL ELEVATION TABLE</u>	
<i>MW 1</i>	
GROUND ELEV.	814.43
PVC PIPE ELEV.	813.88
<i>MW 2</i>	
GROUND ELEV.	814.04
PVC PIPE ELEV.	813.58
<i>MW 3</i>	
GROUND ELEV.	812.75
PVC PIPE ELEV.	812.19
<i>MW 4</i>	
GROUND ELEV.	809.20
PVC PIPE ELEV.	808.51
<i>MW 5</i>	
GROUND ELEV.	811.75
PVC PIPE ELEV.	811.20
<i>MW 6</i>	
GROUND ELEV.	809.52
PVC PIPE ELEV.	808.87
<i>MW 7</i>	
GROUND ELEV.	810.44
PVC PIPE ELEV.	809.88
<i>MW 8</i>	
GROUND ELEV.	810.34
PVC PIPE ELEV.	809.87
<i>MW 9</i>	
GROUND ELEV.	808.79
PVC PIPE ELEV.	808.12
<i>MW 10</i>	
GROUND ELEV.	808.60
PVC PIPE ELEV.	807.93
<i>MW 11</i>	
GROUND ELEV.	805.55
PVC PIPE ELEV.	808.47
<i>MW 12</i>	
GROUND ELEV.	814.04
PVC PIPE ELEV.	817.09
<i>MW 13</i>	
GROUND ELEV.	805.48
PVC PIPE ELEV.	808.53



1252838

STATE BAR OF WISCONSIN FORM 3 - 1982  
QUIT CLAIM DEED

DOCUMENT NO.

OUTAGAMIE COUNTY  
RECEIVED FOR RECORD

DEC 30 1997

AT 10 O'CLOCK A.M. P.M.  
GRACE HERB  
REGISTER OF DEEDS

Robert Wirth, Jr.

quit-claims to Ricky J. Wirth

the following described real estate in Outagamie County,  
State of Wisconsin:

All of Lot Two (2) of Certified Survey Map No. 2991  
dated September 17, 1997 and recorded October 14,  
1997 at 1:00 P.M. in Volume 16 of Certified Survey  
Maps on page 2991 as number 2991, Document No. 1244341,  
being part of the South One-half (S-1/2) of the  
Southwest One-quarter (SW-1/4) of the Northwest  
One-quarter (NW-1/4) of Section 35, Township 22 North,  
Range 15 East, Town of Hortonia, Outagamie County,  
Wisconsin.

THIS SPACE RESERVED FOR RECORDING DATA

NAME AND RETURN ADDRESS

SORENSEN & STECKBAUER  
ATTORNEYS AT LAW  
223 N. Pine St.  
P.O. Box 129  
Hortonville, WI 54944-0129

12-0-0615-04

PARCEL IDENTIFICATION NUMBER

FEE 8  
# EXEMPT

This is not homestead property.  
(is not)

Dated this 29th day of December, 19 97

Robert Wirth Jr (SEAL)

\* Robert Wirth, Jr.

(SEAL)

\*

(SEAL)

\*

(SEAL)

\*

AUTHENTICATION

ACKNOWLEDGMENT

Signature of Robert Wirth, Jr.

State of Wisconsin, }  
County. } ss.

authenticated this 29th day of December, 19 97

Personally came before me this \_\_\_\_\_ day of  
\_\_\_\_\_, 19\_\_\_\_, the above named

Robert E. Sorenson

TITLE: MEMBER STATE BAR OF WISCONSIN  
(If not, \_\_\_\_\_  
authorized by §706.06, Wis. Stats.)

to me known to be the person \_\_\_\_\_ who executed the foregoing  
instrument and acknowledge the same.

THIS INSTRUMENT WAS DRAFTED BY

Attorney Robert E. Sorenson  
Hortonville, Wisconsin 54944

\* \_\_\_\_\_  
Notary Public, \_\_\_\_\_ County, Wis.  
My commission is permanent. (If not, state expiration date:  
\_\_\_\_\_, 19\_\_\_\_.)

(Signatures may be authenticated or acknowledged. Both are not  
necessary.)

\* Names of persons signing in any capacity should be typed or printed below their signatures.

## G.2. Certified Survey Map

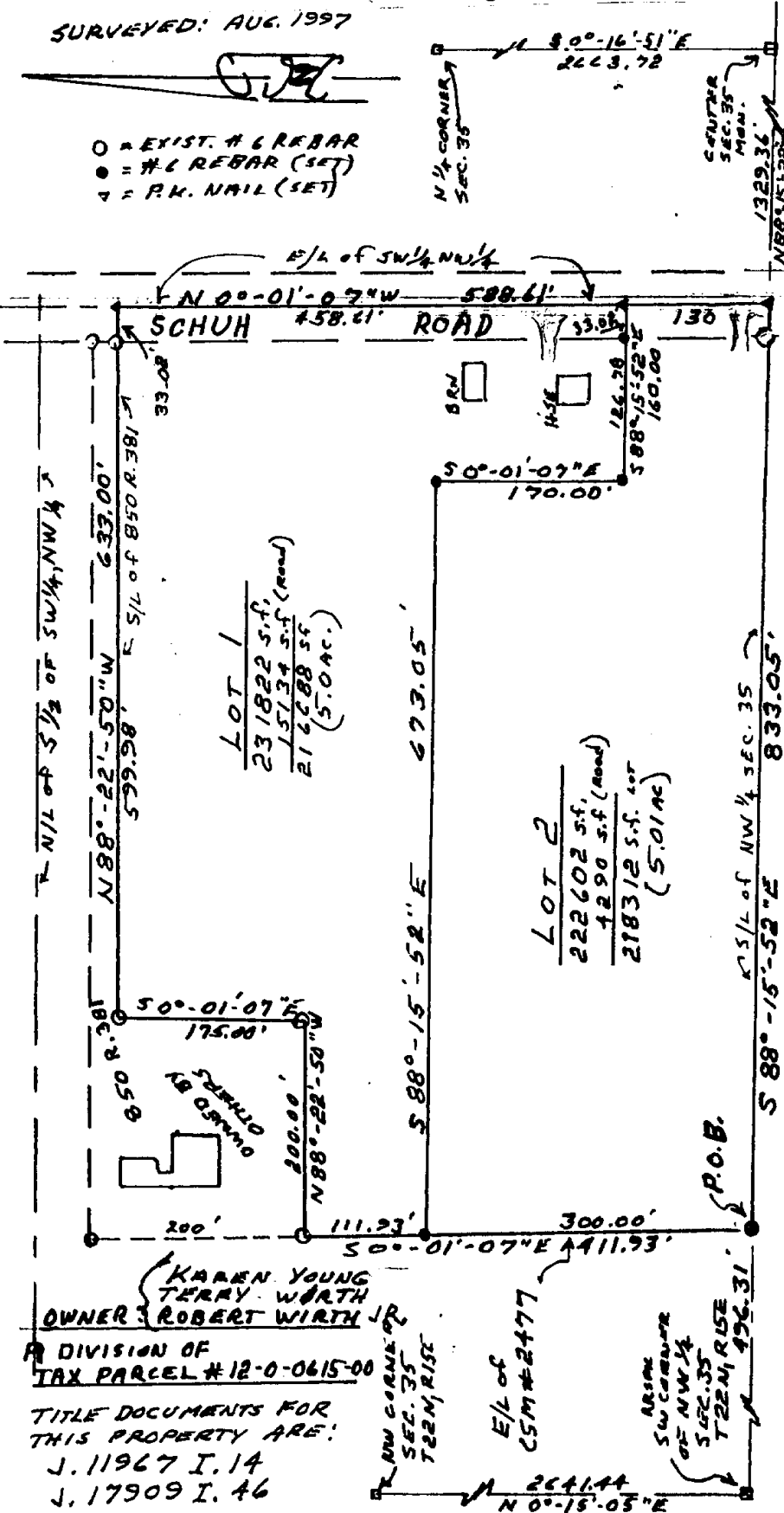
CERTIFIED SURVEY MAP # 2991

Page 2991

Part of the S½ of the SW¼ of the NW¼ of Section 35, T22N, R15E, Town of Hortonia,  
 Outagamie County, Wisconsin

SURVEYED: AUG. 1997

- = EXIST. # 6 REBAR
- = # 6 REBAR (SET)
- ∇ = P.K. NAIL (SET)



Bearings hereon are relative to the S/L of the NW¼, Sec. 35 recorded as: N88°-15'-52"W

I, Thomas C. McClone, Wisconsin Land Surveyor #1374, hereby certify that I have surveyed, divided, and mapped part of the S½ of the SW¼ of the NW¼ of Section 35, T22N, R15E, Town of Hortonia, Outagamie County, Wisconsin, bounded by the following described line: Commencing at the SW corner of said NW¼, Sec. 35; then S88°-15'-52"E, along the S/line of said NW¼, 496.31' to the SE corner of C.S.M. #2477, this being the P.O.B.; then continuing S88°-15'-52"E, along said S/line, 833.05' to the E/line of said SW¼, NW¼, (C/L Schuh Rd.); then N 0°-01'-07"W, along said E/line, 588.61' to the S/L of lands described in 850 R.381, Outa. Co. Records; then N88°-22'-50"W, along said S/L, 633.00'; then S 0°-01'-07"E, along said 850R381 boundary, 175.00'; then N88°-22'-50"W, along same boundary, 200.00' to the E/line of said C.S.M. #2477; then S 0°-01'-07"E, along said E/line, 411.93' to the P.O.B. Bounding 10.43 acres and reserving therefrom that part used for town road purposes (E'ly 33')

SURVEYOR'S CERTIFICATE

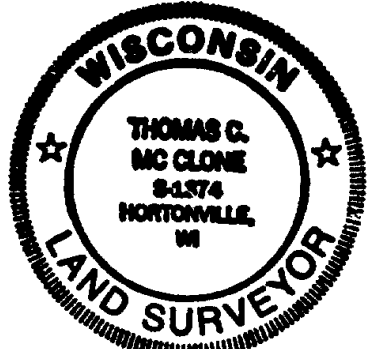
I further certify that I have made this survey and division at the request and direction of the owner of these lands; that the boundary of these lands so divided is correctly described and depicted hereon; and that I've complied with the provisions of Chap. 236.34 of the Wis. Statutes together with all relative town and county regulations in surveying and mapping the parcel.

*Thomas C. McClone* 10/7/97  
 Thomas C. McClone

OWNER: **KAREN YOUNG**  
**TERRY WORTH**  
**ROBERT WIRTH JR.**  
 DIVISION OF  
 TAX PARCEL #12-0-0615-00  
 TITLE DOCUMENTS FOR  
 THIS PROPERTY ARE:  
 J. 11967 I. 14  
 J. 17909 I. 46

Reviewed and approved by the Town of Hortonia  
*Ronald C. Empire* 10/7/97 *Faye Marks* 10-7-97  
 Chair. Date Clerk Date

Reviewed and approved by the Outagamie County  
 Planning and Zoning Office.  
*Nicholas Stundin* 10-14-97  
 Reviewer Date



### G.3. Verification of Zoning

**Town of Hortonia Zoning Districts Listed by Parcel Number**

Parcel Number	Zoning District	Sec	Town ID	Range ID	Deed Acres	GIS Acres	Fire Number	Street	Owner Name	School District	Co. Sup.
120-0599-00	R-1	34	T.22N.	R.15E.	1.770	1.402	W9596	County Rd TT	PANKOW	HASD	35
120-0599-01	R-1	34	T.22N.	R.15E.	1.230	0.968	W9568	County Rd TT	BREITRICK	HASD	35
120-0603-00	R-1	34	T.22N.	R.15E.	2.850	2.800			ST PETER AND PA	HASD	35
120-0604-00	R-1	34	T.22N.	R.15E.	1.080	2.049			KOHL	HASD	35
120-0605-00	R-1	34	T.22N.	R.15E.	16.150	14.798	N2747	State Rd 15	WICKMAN	HASD	35
120-0605-01	R-1	34	T.22N.	R.15E.	0.070	0.112			CLEGG	HASD	35
120-0605-02	C-1	34	T.22N.	R.15E.	1.770	1.344			BAERWALD	HASD	35
120-0605-03	R-1	34	T.22N.	R.15E.	0.420	0.354			CLEGG	HASD	35
120-0605-04	R-1	34	T.22N.	R.15E.	16.130	16.377			CLEGG	HASD	35
120-0605-05	C-1	34	T.22N.	R.15E.	3.000	3.001	N2773	State Rd 15	CLEGG	HASD	35
120-0606-00	R-1	34	T.22N.	R.15E.	39.420	38.429	W9442	County Rd TT	WILLENKAMP	HASD	35
120-0608-00	R-1	34	T.22N.	R.15E.	4.980	4.630	W9386	County Rd TT	BELLILE	HASD	35
120-0609-00	R-1	35	T.22N.	R.15E.	32.500	40.250			GRAND VIEW GOL	HASD	35
120-0610-00	R-1	35	T.22N.	R.15E.	40.000	39.979	N2850	Douglas St	PARKER	HASD	35
120-0611-00	R-1	35	T.22N.	R.15E.	37.900	36.896	N2828	Givens Rd	SYKES	HASD	35
120-0611-01	R-1	35	T.22N.	R.15E.	1.990	1.836	N2813	Douglas St	WISCONSIN ELEC	HASD	35
120-0612-00	R-1	35	T.22N.	R.15E.	10.750	10.282	N2809	Douglas St	CRANDALL	HASD	35
120-0614-00	R-1	35	T.22N.	R.15E.	10.750	10.264	N2746	Givens Rd	SCHUMACHER	HASD	35
120-0615-00	R-1	35	T.22N.	R.15E.	3.410	3.217			ZIEGLER	HASD	35
120-0615-01	R-1	35	T.22N.	R.15E.	2.040	2.017	N2801	Douglas St	WIRTH	HASD	35
120-0615-02	R-1	35	T.22N.	R.15E.	5.050	4.907	N2730	Givens Rd	STATEZNY	HASD	35
120-0615-04	R-1	35	T.22N.	R.15E.	6.250	6.016	N2729	Douglas St	WIRTH	HASD	35
120-0616-00	R-1	35	T.22N.	R.15E.	0.740	0.613	N2742	Givens Rd	BRADLEY	HASD	35
120-0617-00	R-1	35	T.22N.	R.15E.	0.280	0.231			JENNERJOHN LLC	HASD	35
120-0618-00	R-1	35	T.22N.	R.15E.	3.310	3.326	N2806	Douglas St	STUEWER	HASD	35
120-0618-01	R-1	35	T.22N.	R.15E.	3.200	4.306	W9138	Forevergreen Ct	RIEHL	HASD	35
120-0618-02	R-1	35	T.22N.	R.15E.	3.220	3.215			SHANK	HASD	35
120-0618-03	R-1	35	T.22N.	R.15E.	3.500	3.502	W9156	Forevergreen Ct	SHANK	HASD	35
120-0618-04	R-1	35	T.22N.	R.15E.	5.280	5.277	W9150	Forevergreen Ct	EICKHOFF	HASD	35
120-0619-01	R-1	35	T.22N.	R.15E.	3.600	3.603	N2802	Douglas St	KALWITZ	HASD	35
120-0619-02	R-1	35	T.22N.	R.15E.	3.390	3.388	W9141	Forevergreen Ct	RADTKE	HASD	35
120-0619-03	R-1	35	T.22N.	R.15E.	3.050	3.054	W9169	Forevergreen Ct	OLK	HASD	35
120-0619-04	R-1	35	T.22N.	R.15E.	3.210	3.214	W9153	Forevergreen Ct	HIETPAS	HASD	35
120-0619-05	R-1	35	T.22N.	R.15E.	5.000	4.998	W9147	Forevergreen Ct	BONGERS	HASD	35
120-0644-00	R-1	18	T.22N.	R.15E.	0.000	0.300	W10876	Oak St	UTKE	NL	35
120-0645-00	R-1	18	T.22N.	R.15E.	0.000	0.346	W10870	Oak St	KRUEGER	NL	35
120-0646-00	R-1	18	T.22N.	R.15E.	0.000	0.358	1515	Algoma St	BRIGHAM	NL	35
120-0648-00	R-1	18	T.22N.	R.15E.	0.000	0.486	W10845	Evergreen St	ZIEGLER	NL	35
120-0654-00	R-1	18	T.22N.	R.15E.	0.000	0.926	W10852	Oak St	PALUCCI	NL	35
120-0668-00	R-1	18	T.22N.	R.15E.	0.000	0.796	W10857	Oak St	FUHRMANN	NL	35
120-0669-00	R-1	18	T.22N.	R.15E.	0.000	0.629	W10871	Oak St	LEHMAN	NL	35
120-0670-00	R-1	18	T.22N.	R.15E.	0.000	0.421	W10881	Oak St	HUZZAR	NL	35
120-0671-00	R-1	18	T.22N.	R.15E.	0.000	0.309	W10887	Oak St	MCKEEVER	NL	35
120-0680-00	R-1	18	T.22N.	R.15E.	0.000	0.150			NICHOLS	NL	35
120-0684-00	R-1	18	T.22N.	R.15E.	0.000	0.290	N3820	County Rd T	SCHLICHT	NL	35
120-0687-00	R-1	18	T.22N.	R.15E.	1.500	1.030	N3814	County Rd T	BROEKER	NL	35
120-0710-00	R-1	18	T.22N.	R.15E.	0.000	0.490	N3824	East St	WILLEMS	NL	35
120-0720-00	R-1	18	T.22N.	R.15E.	0.000	0.340	N3836	East St	CLOSE	NL	35
120-0721-00	R-1	18	T.22N.	R.15E.	0.000	0.451			CLOSE	NL	35
120-0733-00	R-1	18	T.22N.	R.15E.	0.000	0.260	W10777	Grove St	NELSON	NL	35



**Notices:** [Reg TB Sept 10th, 7pm](#)  
**Plan Cmsn:** [Sept 4th, 6:30pm](#)  
**Clerks Notices** [\[CLICK HERE!\]](#)

AND INFORMATION ABOUT STORM RECOVERY

**Town of Hortonia**  
<http://www.TownOfHortonia.org>

Town Hall 920-779-9780  
 P.O. Box 301, W9702 Givens Rd  
 Hortonville, WI 54944-0301

## Zoning Overview & FAQs

### ZONING OVERVIEW

The Town of Hortonia established its own Zoning Ordinance pursuant to Chapters [§60.62](#) and [§66.058](#) of the Wisconsin State Statutes. It was repealed and recreated on November 12, 1996 and has subsequently been amended numerous times.

Six Zoning Districts exist in the Town of Hortonia by ordinance.

- A-1 Prime Agricultural - 35 acre minimum lot size ([PDF - 126 KB](#))
- RE Rural Estate District - 7 acre minimum lot size ([PDF - 49 KB](#))
- R-1 Residential - 3 acre minimum lot size ([PDF - 46 KB](#))
- M-H Mobile Home District - 10 acre minimum mobile home park area ([PDF - 41 KB](#))
- C-1 Commercial - development to be located along U.S.H. 15 corridor ([PDF - 106 KB](#))
- I Industrial - close proximity to Hortonville or New London ([PDF - 50 KB](#))

#### Ordinances related to Zoning

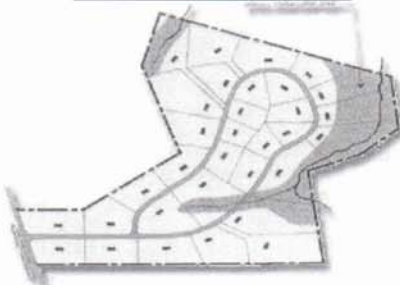
- Repealing and Recreating the Town of Hortonia Zoning Ordinance and Maps adopted 11-12-1996
- Amended Town of Hortonia Zoning Ordinance adopted 12-5-2000 ([PDF - 2.2 MB](#))  
incorporating farmland preservation
- Ordinance amending the Zoning Map approved 2-26-2001  
rezoning parcel 120-0239 from R-1 to C-1; 120-0241 from A-1 to C-1
- Ordinance amending the Zoning Map approved 4-5-2001  
rezoning parcel 120-0043 from A-1 to RE
- Ordinance adopting the Comprehensive Plan adopted 11-13-2006 ([PDF - 353 KB](#))
- Ordinance amending the Zoning Map approved 2-6-2007 ([PDF - 386 KB](#))  
rezoning 54 parcels to bring land use into compliance with zoning
- Ordinance to Provide for Conservation Subdivisions adopted 2-12-2008 ([PDF - 485 KB](#))

#### Forms related to Zoning

REZONING/VARIANCE REQUEST FORM ([PDF - 70 KB](#))

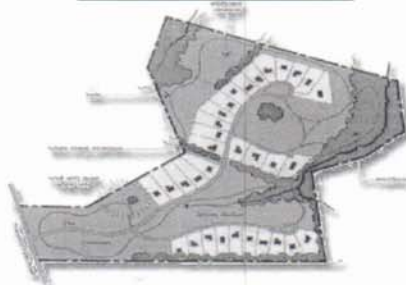
On November 13, 2006 an ordinance adopting the Town of Hortonia Comprehensive Guide Plan was adopted and remains the guide by which the Planning Commission determines whether new developments will be permitted. Note: many Towns within Outagamie County have adopted Outagamie County's zoning. Hortonia has its own zoning. Regarding new development in the Town of Hortonia, the Comprehensive Guide Plan favors Conservation Subdivision designs. Below is a brief summary of Conventional vs. Conservation subdivision design.

**Conventional Subdivision**



- 32 home sites
- 80% of subdivision becomes lawn
- no trails
- natural features lost
- indigenous vegetation removed

**Conservation Subdivision**



- 32 home sites
- 25% of subdivision is lawn
- walking trails surrounding site
- open spaces and natural features preserved
- old growth trees protected

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118 N. Mill Street  
P.O. Box 99  
Hortonville, WI 54944-0099

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Phone: 920-779-6011  
Fax: 920-779-6552  
[www.hortonvillewi.org](http://www.hortonvillewi.org)

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August 26, 2013

Tim Anderson  
United Engineering Consultants

Re: Parcel 240-031100

Dear Mr. Anderson:

The property located at 111 N. Douglas St. in the Village of Hortonville, parcel #240-031100, is zoned I2 General Industrial.

Sincerely,

A handwritten signature in cursive script that reads "Lynne Mischker".

Lynne Mischker, WCMC  
Clerk-Treasurer

#### G.4. Signed Statement



August 5, 2013

Ms. Jennifer Borski  
Remediation and Redevelopment Program  
Wisconsin Department of Natural Resources  
625 E. County Road Y, Suite 700  
Oshkosh, Wisconsin 54901-9731

The attached Quit Claim Deed and Certified Survey Map #2991 were obtained from Outagamie County on May 15, 2013. To the best of our knowledge, the legal description on these documents is complete and accurate for the property located at N2729 Douglas Street in Hortonville, Wisconsin 54944

Sincerely,  
UNITED ENGINEERING CONSULTANTS, INC.

A handwritten signature in cursive script that reads "Timothy J. Anderson".

Timothy J. Anderson, P.E.  
Principal



**Keystone Consolidated Industries, Inc.**

Three Lincoln Centre  
5430 LBJ Freeway, Suite 1740  
Dallas, Texas 75240  
(972) 458-0028  
Fax (972) 448-1445

David C. Kilpatrick  
Associate General Counsel  
(972) 448-1411  
[dkilpatrick@valhi.net](mailto:dkilpatrick@valhi.net)

September 9, 2013

Ms. Jennifer Borski  
Remediation and Redevelopment Program  
Wisconsin Department of Natural Resources  
625 E. County Road Y, STE. 700  
Oshkosh, WI 54901-9731

Re: WDNR BRRTS Site Name: Keystone Consolidated Industries, Inc.  
WDNR BRRTS Activity Number: 02-45-560221  
WDNR FID Number: 445031620

Dear Ms. Borski:

Please be advised that after further investigation, the information contained in May 23, 2013 letter to you regarding the legal description of the property located at 111 N. Douglas Street, Hortonville, WI was found to be incorrect. A disposition of part of the property that occurred in 2005 was not properly included.

The correct legal description is as follows:

*Legal Description:*

ALL THAT PART OF THE NORTHWEST ¼ OF THE SOUTHWEST ¼ OF SECTION THIRTY-FIVE (35), TOWNSHIP TWENTY-TWO (22) NORTH, RANGE FIFTEEN (15) EAST, LYING NORTH OF THE RIGHT-OF-WAY OF THE CHICAGO AND NORTHWESTERN RAILROAD COMPANY, VILLAGE OF HORTONVILLE, OUTAGAMIE COUNTY, WISCONSIN.

LESS AND EXCEPTING LANDS CONVEYED TO STATE OF WISCONSIN, DEPARTMENT OF TRANSPORTATION IN JACKET 6737, IMAGE 37, AS DOCUMENT NO. 894927.

DESCRIBED AS FOLLOWS:

ALL THAT LAND OF THE OWNER IN THE NW1/4-SW1/4 SECTION 35, T22N, R15E, LYING WITHIN THE FOLLOWING DESCRIBED TRAVERSE:

COMMENCING AT THE WEST ONE-QUARTER CORNER OF SAID SECTION 35; THENCE ALONG THE WEST SECTION LINE S00°55'19"E 638.47 FEET TO A POINT ON A CURVE WITH A RADIUS AT SAID POINT BEARING S5°38'53"W 34,377.47 FEET; THENCE EASTERLY ALONG SAID CURVE TO THE RIGHT AND ALONG THE USH 45 REFERENCE LINE 81.79 FEET; THENCE S84°12'56"E 1163.90 FEET TO THE POINT OF BEGINNING; THENCE N05°47'04"E 100.00 FEET; THENCE S84°12'56"E 84.42 FEET; THENCE S00°47'56"E 100.66 FEET TO SAID REFERENCE LINE; THENCE ALONG SAID LINE N84°12'56"W 95.96 FEET TO THE POINT OF BEGINNING.

Page 2  
September 9, 2013  
Ms. Jennifer Borski  
Remediation and Redevelopment Program  
Wisconsin Department of Natural Resources

FURTHER LESS AND EXCEPTING LANDS CONVEYED BY WARRANTY DEED RECORDED  
IN DOCUMENT NO. 1550727. DESCRIBED AS FOLLOWS:  
THE EAST 200 FEET OF THE NORTH 247 FEET OF THE NW ¼ OF THE SW ¼, SECTION 35,  
TOWNSHIP 22 NORTH, RANGE 15 EAST, VILLAGE OF HORTONVILLE, OUTAGAMIE  
COUNTY, WISCONSIN.

After you have reviewed, please let me know if you have any questions or require  
anything further.

Regards,



David C. Kilpatrick  
Associate General Counsel

DCK/gw