

June 24, 2020

MR TODD LUEDTKE
426 CROWFOOT AVE
FOND DU LAC WI 54935

KEEP THIS DOCUMENT WITH YOUR PROPERTY RECORDS

SUBJECT: Final Case Closure with Continuing Obligations
Luedtke Property, 11 West Wisconsin Avenue, Tomahawk
DNR BRRTS Activity #03-35-554426
FID # 735041230

Dear Mr. Luedtke:

The Department of Natural Resources (DNR) considers the Luedtke Property site closed, with continuing obligations. No further investigation or remediation is required at this time. However, you, future property owners and occupants 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 to anyone who purchases, rents or leases this property from you. Certain continuing obligations also apply to affected property owners or rights-of-way holders. These are identified within each continuing obligation.

This final closure decision is based on the correspondence and data provided and is issued under Wis. Admin. Code chs. NR 726 and 727. The DNR's Northern Region Closure Committee (Closure Committee) reviewed the request for closure on May 27, 2020. The Closure Committee reviewed this environmental remediation case for compliance with state laws and standards to maintain case closure consistency.

The investigative and remedial activities completed at this site were conducted for the discharge of hazardous substances, environmental pollution, or both (hereinafter referred to as contamination) at this site which was historically used as a gas station and repair shop. Case closure under Wis. Admin. Code chs. NR 726 and 727 is granted for the contaminants analyzed during the site investigation, as documented in the DNR case file. Petroleum contamination was discovered in 2009 after petroleum odors were reported by the adjacent movie theatre. Investigation activities included soil sampling and groundwater monitoring. Soil and groundwater contamination will be addressed through natural attenuation. The conditions of closure and continuing obligations required were based on the property being used for commercial purposes.

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 at or above Wis. Admin. Code ch. NR 140 enforcement standards.
- Residual soil contamination exists that must be properly managed should it be excavated or removed.

The enclosed 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 online at dnr.wi.gov and search “RR-819”.

DNR Database

This site will be included on the Bureau for Remediation and Redevelopment Tracking System (BRRTS) on the Web (BOTW) at dnr.wi.gov and search “BOTW”, 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, at dnr.wi.gov and search “RRSM”.

The DNR’s approval prior to well construction or reconstruction is required in accordance with Wis. Admin. Code § NR 812.09 (4) (w). 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 dnr.wi.gov and search “3300-254”.

All site information is also on file at the DNR’s Northern Region office, at 107 Sutliff Avenue in Rhinelander, Wisconsin. This letter and information that was submitted with your closure request application, including any maps, can be found as a Portable Document Format (PDF) in BRRTS on the Web (BOTW).

Closure Conditions

Compliance with the requirements of this letter is a responsibility to which you, 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 Wis. Stat. § 292.11, 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 Associate
107 Sutliff Avenue
Rhinelander, Wisconsin 54501

Residual Groundwater Contamination (Wis. Admin. Code chs. NR 140, NR 812)

Groundwater contamination greater than enforcement standards is present both on this contaminated property and off this contaminated property, as shown on the attached Figure B.3.b Groundwater Isoconcentration (12/10/18), prepared by METCO and dated January 18, 2017. If you intend to construct a new well, or reconstruct an existing well, you’ll need prior DNR approval. This continuing obligation also applies to the owners of 3 West Wisconsin Avenue (PIN #28635063430173), and the rights-of-way holders for West Wisconsin Avenue.

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

Soil contamination remains in the north central area of the property, around the perimeter of the former underground storage tank system and in the right-of-way of West Wisconsin Avenue, as indicated on the attached Figure B.2.b Residual Soil Contamination, prepared by METCO and dated January 18, 2017. If soil in the specific locations described above is excavated in the future, the property owner 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 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 Wis. Admin. Code ch. NR 718, with prior DNR approval. This continuing obligation also applies to the owners of 17 West Wisconsin Avenue (PIN #28635063430171), and the rights-of-way holders for West Wisconsin Avenue.

In addition, all current and future owners and occupants of the property 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.

PECFA Reimbursement

Per Wis. Stat. § 292.63 (2) (ac), a claim for Petroleum Environmental Cleanup Fund Award (PECFA) reimbursement must be submitted within 180 days of incurring costs, or by June 30, 2020, whichever comes first, or the costs will not be eligible for PECFA reimbursement.

In addition, Wis. Stat. § 292.63 (4) (cc) requires that PECFA claimants seeking reimbursement of interest costs, for sites with petroleum contamination, submit a final reimbursement claim within 120 days after they receive a closure letter on their site, or by June 30, 2020, whichever comes first, or interest costs will not be eligible for PECFA reimbursement.

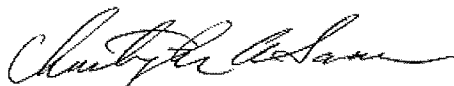
In Closing

Please be aware that the case may be reopened pursuant to Wis. Admin. Code § NR 727.13, 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 Wis. Stat. § 292.15, 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 Aaron Zielsdorf at (715) 623-4190 ext. 3109, or at Aaron.Zielsdorf@Wisconsin.gov. You can also contact me at (715) 685-2920 or by email at Christopher.Saari@Wisconsin.gov.

Sincerely,



Christopher A. Saari
Northern Team Supervisor
Remediation and Redevelopment Program

Encl. Continuing Obligations for Environmental Protection, DNR Publication RR-819

Attachments:

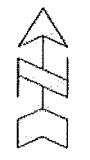
- Figure B.3.b Groundwater Isoconcentration (12/10/18), METCO, January 18, 2017
- Figure B.2.b Residual Soil Contamination, METCO, January 18, 2017

cc: Ron Anderson – METCO (via email)
Aaron Zielsdorf – DNR Antigo (via email)

B.3.b GROUNDWATER ISOCONCENTRATION (12/10/18)
 LUEDTKE PROPERTY

709 Giffette St, Suite J
 Le Mans, WI 54603
 Tel: (920) 781-9879
 Fax: (920) 781-8891

TOMAHAWK, WISCONSIN
 DRAWN BY: ED
 DATE: 04/18/2017



NOTE: INFORMATION BASED ON AVAILABLE DATA ACTUAL CONDITIONS MAY DIFFER

⊕ - FORMER MONITORING WELL LOCATION - LES STANDARD

⊗ - MONITORING WELL LOCATION - METCO

✕ - SOIL BORING LOCATION

▤ - STORM DRAIN

⊙ - FIRE HYDRANT

● - LIGHT POLE

--- - PROPERTY BOUNDARY

- - - - - SANITARY SEWER LINE

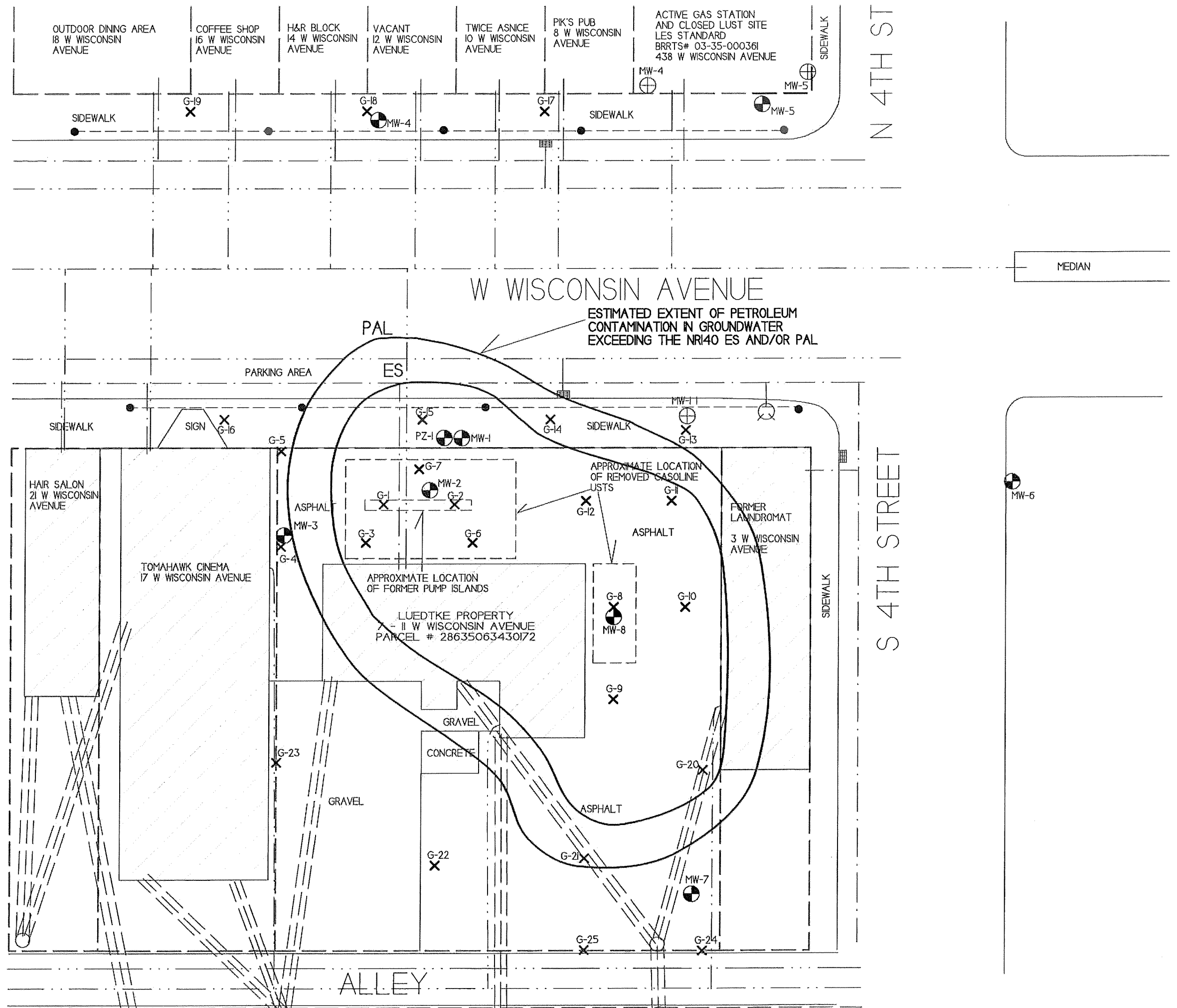
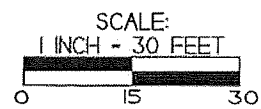
- - - - - STORM SEWER LINE

- - - - - WATER LINE

- - - - - GAS LINE

- - - - - BURIED ELECTRIC LINE

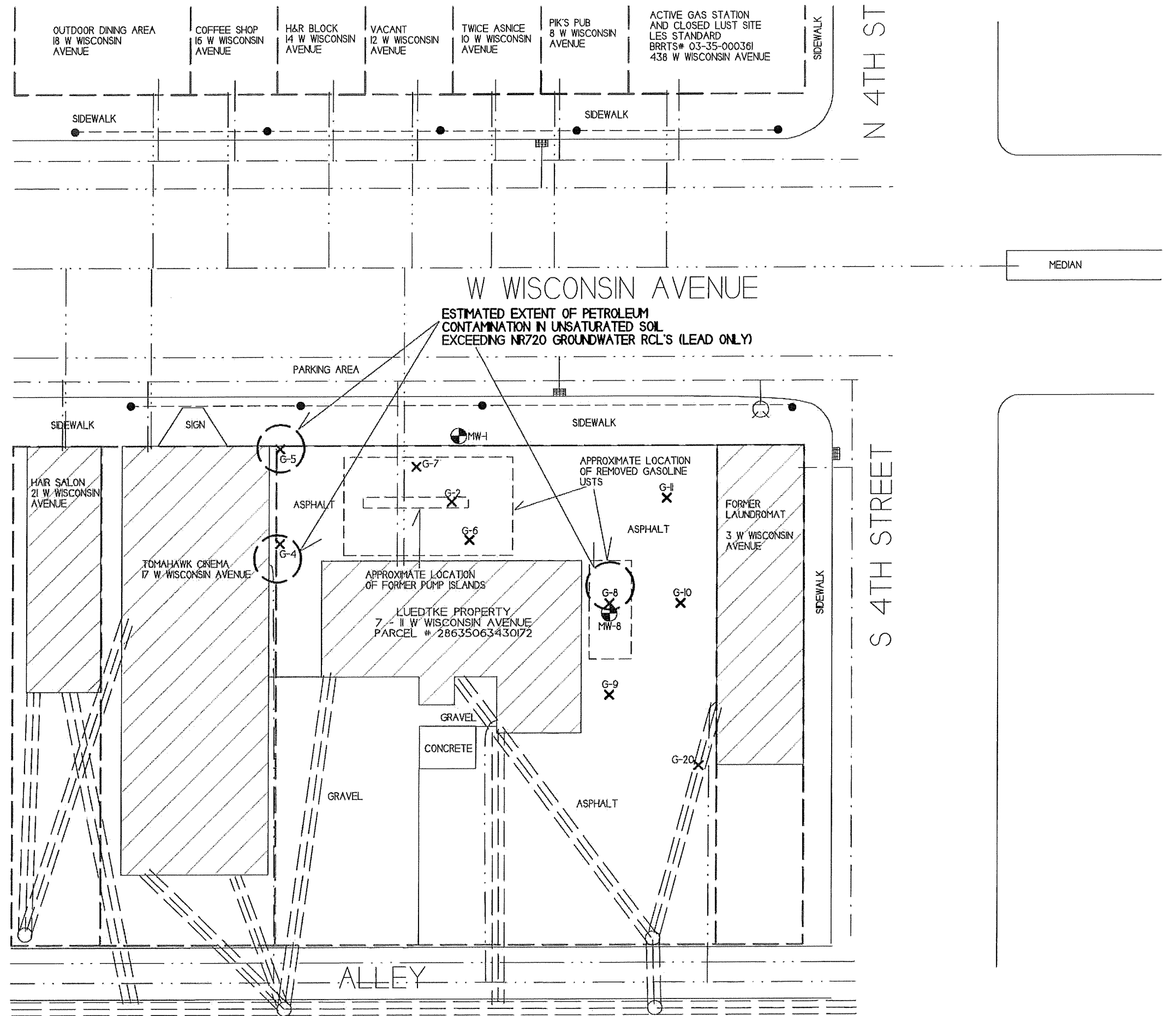
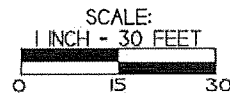
==== OVERHEAD ELECTRIC



B.2.b RESIDUAL SOIL CONTAMINATION LUEDTKE PROPERTY		
709 Calumet St., Suite 2 La Crosse, WI 54601 Tel: (608) 781-8870 Fax: (608) 781-8953		
TOMAHAWK, WISCONSIN DRAWN BY: ED DATE: 04/18/2017		

NOTE: INFORMATION BASED ON AVAILABLE DATA ACTUAL CONDITIONS MAY DIFFER

- ⊕ - FORMER MONITORING WELL LOCATION - LES STANDARD
- ⊙ - MONITORING WELL LOCATION - METCO
- ✕ - SOIL BORING LOCATION
- ▣ - STORM DRAIN
- ⊕ - FIRE HYDRANT
- - LIGHT POLE
- - PROPERTY BOUNDARY
- - - - - SANITARY SEWER LINE
- - - - - STORM SEWER LINE
- - - - - WATER LINE
- - - - - GAS LINE
- - - - - BURIED ELECTRIC LINE
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Wisconsin Department of Natural Resources
Case Closure – GIS Registry
NR 4400-202

For: Luedtke Property
BRRTS # 03-35-554426

August 28, 2019



Excellence through experience™



Excellence through experience™

709 Gillette St., Ste 3 ♦ La Crosse, WI 54603 ♦ 1-800-552-2932 ♦ Fax (608) 781-8893 Email: rona@metcohq.com ♦ www.metcohq.com

August 28, 2019

WDNR BRRTS#: 03-35-554426

PECFA #: 54487-1334-11

Kathleen Shafel, Environmental Program Associate
WDNR Remediation and Redevelopment Program
WDNR Northern Region
223 East Steinfest Road
Antigo, Wisconsin 54409

RE: Luedtke Property - Closure Review and GIS Registry Fees

Dear Ms. Shafel,

The \$1,050 WDNR Closure Review Fee and the \$650 GIS Registry Fee (Soil and Groundwater) for the Luedtke Property site (BRRTS #: 03-35-554426) located in Tomahawk, Wisconsin was unable to be paid at this time. The complete closure submittal is being sent to Carrie Stoltz of the Wisconsin Department of Natural Resources.

Sincerely,

A handwritten signature in black ink that reads "Jason T. Powell". The signature is fluid and cursive.

Jason T. Powell
Staff Scientist

C: Todd Luedtke - Client

Table of Contents

WDNR Case Summary and Case Closure – GIS Registry Form

Attachment A/Data Tables

Attachment B/Maps, Figures, and Photos

Attachment C/Documentation of Remedial Action

Attachment D/Maintenance Plan(s)

Attachment E/Monitoring Well Information

Attachment F/Source Legal Documents

Attachment G/Notifications to Owners of Affected Properties

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. 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.). Incomplete forms will be considered "administratively incomplete" and processing of the request will stop until required information is provided.

Site Information			
BRRTS No.	VPLE No.		
03-35-554426			
Parcel ID No.			
36.0002.000.304.0000			
FID No.	WTM Coordinates		
735041230	X	Y	
	541123	555277	
BRRTS Activity (Site) Name	WTM Coordinates Represent:		
Luedtke Property	<input type="checkbox"/> Source Area <input checked="" type="checkbox"/> Parcel Center		
Site Address	City	State	ZIP Code
11 W Wisconsin Avenue	Tomahawk	WI	54487
Acres Ready For Use	0.41		

Responsible Party (RP) Name	Todd Luedtke		
Company Name			

Mailing Address	City	State	ZIP Code
426 Crowfoot Avenue	Fond du Lac	WI	54935
Phone Number	Email		
(920) 602-4910	ih6588@aol.com		

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

Environmental Consultant Name	Ron Anderson		
Consulting Firm	METCO		

Mailing Address	City	State	ZIP Code
709 Gillette Street Suite 3	La Crosse	WI	54603
Phone Number	Email		
(608) 781-8879	rona@metcohq.com		

Fees and Mailing of Closure Request

- Send a copy of page one of this form and the applicable ch. NR 749, Wis. Adm. Code, fee(s) to the DNR Regional EPA (Environmental Program Associate) at <http://dnr.wi.gov/topic/Brownfields/Contact.html#tabx3>. Check all fees that apply:

<input checked="" type="checkbox"/> \$1,050 Closure Fee	<input checked="" type="checkbox"/> \$300 Database Fee for Soil
<input checked="" type="checkbox"/> \$350 Database Fee for Groundwater or Monitoring Wells (Not Abandoned)	Total Amount of Payment \$ <u>\$1,700.00</u>
	<input type="checkbox"/> Resubmittal, Fees Previously Paid
- 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 portion of the Site Summary Section is not relevant to the case closure request, you must fully explain the reasons why in the relevant section of the form. All information submitted shall be legible. Providing illegible information will 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 Luedtke Property site, 11 W. Wisconsin Avenue, is located at the SW 1/4, SW 1/4, Section 34, Township 35 North, Range 6 East, in Tomahawk, Lincoln County, WI. The site is bound by W Wisconsin Street to the north, a public alley to the south, and business properties to the east and west.
- B. **Prior and current site usage:** Specifically describe the current and historic occupancy and types of use.
A gas station and repair shop (Country Co-op) operated on the subject property from approximately the 1940s until the mid-1980s. After the gas station closed, the building was converted to retail space and has been used for retail/office purposes since then.
- In 1986, four 10,000-gallon leaded gasoline UST's were removed from the subject property.
- C. **Current zoning** (e.g., industrial, commercial, residential) for the site and for neighboring properties, and how verified (Provide documentation in Attachment G).
According to the City of Tomahawk Zoning Map, the Luedtke Property is zoned as B-1 Business. The properties to the north, east, south, and west are also zoned as Business properties.
- D. **Describe how and when site contamination was discovered.**
On October 30, 2009, petroleum odors were noticed in the basement of the movie theater located on the adjacent property to the west and reported to the Tomahawk Fire Department. On November 2, 2009, John Sager of the WDNR visited the site to observe the petroleum odors in the basement and investigate possible petroleum sources. No petroleum sources were identified at that time. Further investigation by the WDNR revealed that four 10,000-gallon leaded gasoline USTs were registered on the Wisconsin tank database for the Luedtke Property at 11 W Wisconsin Avenue. Since the former gasoline tanks from the Luedtke Property were suspected to be the source of the petroleum release, the WDNR required that a site investigation be completed.
- E. **Describe the type(s) and source(s) or suspected source(s) of contamination.**
Petroleum contamination appears to have originated from the former UST system.
- F. **Other relevant site description information** (or enter Not Applicable).
Not Applicable
- G. **List BRRTS activity/site name and number for BRRTS activities at this source property, including closed cases.**
No other BRRTS activities exist at the subject property.
- H. **List BRRTS activity/site name(s) and number(s) for all properties immediately adjacent to (abutting) this source property.**
There are currently no BRRTS cases for any immediately adjacent properties.

2. General Site Conditions

- A. **Soil/Geology**
- i. **Describe soil type(s) and relevant physical properties, thickness of soil column across the site, vertical and lateral variations in soil types.**
Local unconsolidated materials in the area of investigation generally consist of brown to gray to tan fine to coarse grained sand with gravel from surface to depths at least 13 to 16 feet below ground surface. At depths ranging from 13 to 16 feet bgs and extending to approximately 24 feet bgs exists a gray silt to sandy silt. At approximately 24 feet and extending to at least 30 feet bgs exists a tan very fine to fine grained sand to silty sand.
- ii. **Describe the composition, location and lateral extent, and depth of fill or waste deposits on the site.**
Fill material consisting of fine to coarse grained sand with gravel and bricks was encountered in soil boring G-1 from surface to 12 feet bgs.
- iii. **Describe the depth to bedrock, bedrock type, competency and whether or not it was encountered during the investigation.**
Bedrock was not encountered during the site investigation, but granite bedrock is expected to exist at approximately 50-100 feet bgs, based on local well construction reports.

- iv. 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 on-site building is located in the central portion of the property. An asphalt driveway/parking lot exists to the west, north, east, and southeast of the building. An area of gravel exists to the south and southwest of the on-site building. A concrete apron exists to the south of the on-site building where the dumpsters are kept.

B. Groundwater

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

Groundwater exists at depths from 6.43 to 8.26 feet bgs in monitoring wells depending on well location and time of year. Free product has not affected watertable elevation measurements in any monitoring wells. The stratigraphic unit where the watertable exists consists of fine to coarse grained sand with gravel. The depth to water in the piezometer ranged from 8.25 to 9.15 feet bgs depending on the time of year. The stratigraphic unit where the water table was measured for piezometric levels consists of very fine grained sand to silty sand.

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

According to the watertable measurements collected during groundwater sampling, local horizontal groundwater flow in the immediate area of the subject property is generally toward the west to northwest.

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

On January 29, 2018, METCO conducted slug tests on monitoring wells MW-1 and MW-8, and piezometer PZ-1. The slug test data was evaluated using the curve fitting program "Hydro-Test for Windows" Produced by Dakota Environmental, Inc. Slug test data was evaluated using the Bouwer and Rice method. Hydrogeologic parameters were estimated as follows:

Monitoring Well MW-1

Hydraulic Conductivity (K) = 7.07E-04 cm/sec
Transmissivity = 1.78E-01 cm²/sec
Flow Velocity (V=KI/n) = 1.20792 m/yr

Monitoring Well MW-8

Hydraulic Conductivity (K) = 4.54E-04 cm/sec
Transmissivity = 1.05E-01 cm²/sec
Flow Velocity (V=KI/n) = 0.77578 m/yr

Piezometer PZ-1

Hydraulic Conductivity (K) = 3.72E-04 cm/sec
Transmissivity = 2.41E-01 cm²/sec
Flow Velocity (V=KI/n) = 0.63521 m/yr

Since the thickness of the unconfined aquifer was unknown, the bottoms of monitoring/piezometer wells MW-1 and MW-8, and PZ-1 were assumed as the lower extent of the aquifer for calculation purposes

- iv. Identify and describe locations/distance of potable and/or municipal wells within 1200 feet of the site. Include general summary of well construction (geology, depth of casing, depth of screened or open interval).

The subject property and surrounding properties are all served by the City of Tomahawk municipal water supply. The City of Tomahawk has two municipal wells, which are located approximately 4,000 feet to the south of the subject property. The City of Tomahawk is not aware of any private water supply wells in this area. If any private wells do exist, they are not used for domestic purposes.

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.

On May 8-9, 2017, METCO completed twenty-five Geoprobe borings (G-1 thru G-25). Seventy-three soil samples and twenty-five groundwater samples were collected from the borings for field and/or laboratory analysis.

On November 13-14, 2017, METCO completed nine soil borings which were converted to monitoring/piezometer wells (MW-1 thru MW-8, and PZ-1). Thirty-seven soil samples were collected for field and/or laboratory analysis. One composite soil sample was also collected for waste disposal characterization. Upon completion, the monitoring/piezometer wells were properly developed.

On December 12, 2017, DKS Transport Services, LLC picked up and properly disposed of 9 drums of soil cuttings and 2 drums of purge water.

On January 29, 2018, METCO personnel collected groundwater samples from eight monitoring/piezometer wells (MW-1 thru MW-6, MW-8, and PZ-1) for field and laboratory analysis. The well network was properly surveyed to feet mean sea level (msl) by Fauerbach Surveying & Engineering at this time. However, monitoring well MW-7 could not be sampled or surveyed as the well was beneath a large snow/ice pile and could not be located. METCO also conducted slug tests on three monitoring/piezometer wells (MW-1, MW-8, and PZ-1).

On April 30, 2018, METCO personnel collected groundwater samples from nine monitoring/piezometer wells (MW-1 thru MW-8, and PZ-1) for field and laboratory analysis. Monitoring well MW-7 was also properly surveyed by METCO personnel to feet msl at this time.

On September 19, 2018, METCO personnel collected groundwater samples from nine monitoring/piezometer wells (MW-1 thru MW-8, and PZ-1) for PVOC and Naphthalene analysis. Three of the wells (MW-1, MW-8, and PZ-1) were also sampled for Dissolved Lead. Field measurements for water level, Dissolved Oxygen, pH, ORP, temperature, and Specific Conductivity were collected from all sampled monitoring wells.

On December 10, 2018, METCO personnel collected groundwater samples from nine monitoring/piezometer wells (MW-1 thru MW-8, and PZ-1) for PVOC and Naphthalene analysis. Three of the wells (MW-1, MW-8, and PZ-1) were also sampled for Dissolved Lead. Field measurements for water level, Dissolved Oxygen, pH, ORP, temperature, and Specific Conductivity were collected from all sampled monitoring wells.

- ii. Identify whether contamination extends beyond the source property boundary, and if so describe the media affected (e.g., soil, groundwater, vapors and/or sediment, etc.), and the vertical and horizontal extent of impacts.
Soil contamination exceeding the NR720 Groundwater RCL's for Lead only extends beyond the property boundary onto the property at 17 W Wisconsin Street. The first area is approximately 14 feet wide at the property boundary, extends up to 6 feet onto the affected property, and is up to 3.5 feet thick. The second area is approximately 7 feet wide at the property boundary, extends up to 6 feet onto the affected property, and is up to 3.5 feet thick.

Soil contamination exceeding the NR720 Groundwater RCL's for Lead only extends beyond the property boundary into the right-of-way of W Wisconsin Avenue. This soil contamination plume is approximately 13 feet wide at the property boundary, extends up to 6 feet into the right-of-way, and is up to 3.5 feet thick.

A dissolved phase contaminant plume exceeding the NR140 ES has formed at the watertable and has migrated east onto the property at 3 W Wisconsin Avenue. This groundwater contamination plume extends up to 2 feet onto the affected property and is approximately 61 feet wide at the property boundary.

A dissolved phase contaminant plume exceeding the NR140 ES has formed at the watertable and has migrated north into the right-of-way of W Wisconsin Avenue. This groundwater contamination plume extends up to 19 feet into the right-of-way and is approximately 67 feet wide at the property boundary.
- 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.
No structural impediments interfered with the completion of the site investigation.

B. Soil

- i. Describe degree and extent of soil contamination. Relate this to known or suspected sources and known or potential receptors/migration pathways.
An area of unsaturated soil contamination, which exceeds the NR720 Groundwater RCL values for Lead only exists in the area of removed gasoline UST's. This soil contamination plume consists of an area encompassing soil boring G-8 that is approximately 14 feet in diameter, and up to 3.5 feet thick. A second area of unsaturated soil contamination exceeding the NR720 Groundwater RCL's for Lead only exists to the west of the removed gasoline UST's and former pump islands. This soil contamination plume consists of an area encompassing soil boring G-4 that is approximately 14 feet in diameter and up to 3.5 feet thick. A third area encompassing soil boring G-5 that is approximately 14 feet in diameter, and up to 3.5 feet thick.

A natural gas service line exist in the area of soil contamination plume. The service line to the building are privately owned utilities and there is no documentation of their construction. Gas utility lines are typically buried within 3 feet of ground surface and backfilled with native soil and therefore does not pose a risk as a potential migration pathway.
- ii. Describe the concentration(s) and types of soil contaminants found in the upper four feet of the soil column. Soil samples collected within the upper four feet of the soil column exceeding the NR720 RCL's include:

G-4-1 (3.5 feet bgs): Lead (35.8)
G-5-1 (3.5 feet bgs): Lead (132 ppm)
G-8-1 (3.2 feet bgs): Lead (44 ppm)

- iii. Identify the ch. NR 720, Wis. Adm. Code, method used to establish the soil cleanup standards for this site. This includes a soil performance standard established in accordance with s. NR 720.08, a Residual Contaminant Level (RCL) established in accordance with s. NR 720.10 that is protective of groundwater quality, or an RCL established in accordance with s. NR 720.12 that is protective of human health from direct contact with contaminated soil. Identify the land use classification that was used to establish cleanup standards. Provide a copy of the supporting calculations/information in Attachment C.

The method used to establish soil cleanup standards for this site were the NR720 RCL's. The property is zoned B-1 Business, therefore non-industrial standards were used for this site.

C. Groundwater

- i. Describe degree and extent of groundwater contamination. 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.

A dissolved phase contaminant plume exceeding the NR140 ES and or PAL has formed at the water table in the area of removed gasoline UST's and former pump islands. This plume is approximately 169 feet long and 103 feet wide.

There are no known municipal or private water supply wells within 1,200 feet of the subject property.

Numerous utility lines (water sanitary sewer, natural gas, and electric) exist in the area of groundwater contamination plume. The water main exists at approximately 7 feet below ground surface and is made of 6" ductile iron. The water main was installed in 1986, but the city is unsure of the backfill material. The sanitary sewer main exists at approximately 6 feet below ground surface and is made of 8" plastic piping. The sanitary sewer main was installed in 1986, but the city is unsure of the backfill material. Several sewer (4" or 6" plastic) and water (3/4" copper) lateral lines to the subject property and other nearby buildings also exist in the area of groundwater contamination. These exist at approximately 6-7 feet bgs, but the city is unsure of the backfill material. Based on water level measurements collected from the monitoring wells, groundwater exists at approximately the same depths of the utility corridors. However, due to the sand/gravel native soils in the area, it is unlikely that these are acting as preferential contamination migration pathways.

Natural gas and electric lines typically exist within 30 inches of ground surface and backfilled with native soil. Therefore, these do not appear to be potential contaminant migration pathways.

- ii. Describe the presence of free product at the site, including the thickness, depth, and locations. Identify the depth and location of the smear zone.

Free Product was not encountered during the site investigation.

D. Vapor

- i. Describe how the vapor migration pathway was assessed, including locations where vapor, soil gas, or indoor air samples were collected. If the vapor pathway was not assessed, explain reasons why.

Vapor pathway was not assessed at this site due to the lack of shallow soil contamination near the on-site building and neighboring buildings, and Benzene levels in groundwater are less than 1,000 ppb, therefore vapor intrusion in the on-site building and neighboring buildings from this release are unlikely.

- 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).

No vapor samples were collected as part of the site investigation.

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.

The nearest surface water is Lake Mohawksin, a reservoir on the Wisconsin River, which exists approximately 1,500 feet to the north of the subject property. Since it does not appear that the area of soil and groundwater contamination extends to any surface waters, no surface sediment samples were collected.

- 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.

No surface water or sediment samples were collected.

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 remedial actions were conducted during the site investigation.

- B. Describe any immediate or interim actions taken at the site under ch NR 708, Wis. Adm. Code.

No immediate or interim actions were conducted during the site investigation.

- C. Describe the *active* remedial actions taken at the source property, including: type of remedial system(s) used for each media affected; 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 remedial actions were conducted during the site investigation.

- D. Describe the alternatives considered during the Green and Sustainable Remediation evaluation in accordance with NR 722.09 and any practices implemented as a result of the evaluation.

No evaluation of Green and Sustainable Remediation was conducted.

- E. Describe the nature, degree and extent of residual contamination that will remain at the source property or on other affected properties after case closure.

An area of unsaturated soil contamination, which exceeds the NR720 Groundwater RCL values for Lead only exists in the area of removed gasoline UST's. This soil contamination plume consists of an area encompassing soil boring G-8 that is approximately 14 feet in diameter, and up to 3.5 feet thick. A second area of unsaturated soil contamination exceeding the NR720 Groundwater RCL's for Lead only exists to the west of the removed gasoline UST's and former pump islands. This soil contamination plume consists of an area encompassing soil boring G-4 that is approximately 14 feet in diameter and up to 3.5 feet thick. A third area encompassing soil boring G-5 that is approximately 14 feet in diameter, and up to 3.5 feet thick.

A dissolved phase contaminant plume exceeding the NR140 ES and or PAL has formed at the water table in the area of removed gasoline UST's and former pump islands. This plume is approximately 169 feet long and 103 feet wide.

Soil contamination exceeding the NR720 Groundwater RCL's for Lead only extends beyond the property boundary onto the property at 17 W Wisconsin Street. The first area is approximately 14 feet wide at the property boundary, extends up to 6 feet onto the affected property, and is up to 3.5 feet thick. The second area is approximately 7 feet wide at the property boundary, extends up to 6 feet onto the affected property, and is up to 3.5 feet thick.

Soil contamination exceeding the NR720 Groundwater RCL's for Lead only extends beyond the property boundary into the right-of-way of W Wisconsin Avenue. This soil contamination plume is approximately 13 feet wide at the property boundary, extends up to 6 feet into the right-of-way, and is up to 3.5 feet thick.

A dissolved phase contaminant plume exceeding the NR140 ES has formed at the watertable and has migrated east onto the property at 3 W Wisconsin Avenue. This groundwater contamination plume extends up to 2 feet onto the affected property and is approximately 61 feet wide at the property boundary.

A dissolved phase contaminant plume exceeding the NR140 ES has formed at the watertable and has migrated north into the right-of-way of W Wisconsin Avenue. This groundwater contamination plume extends up to 19 feet into the right-of-way and is approximately 67 feet wide at the property boundary.

- F. Describe the residual soil contamination within four feet of ground surface (direct contact zone) that attains or exceeds RCLs established under s. NR 720.12, Wis. Adm. Code, for protection of human health from direct contact.

There is no known residual soil contamination exceeding the NR720 Direct Contact RCL's.

- G. Describe the residual soil contamination that is above the observed low water table that attains or exceeds the soil standard(s) for the groundwater pathway.

Soil samples above the observed low water table which currently exceed the NR720 Groundwater RCL's include:

G-4-1 (3.5 feet bgs): Lead

G-5-1 (3.5 feet bgs): Lead

G-8-1 (3.5 feet bgs): Lead

- H. 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.

Residual soil contamination and groundwater contamination will be addressed via natural attenuation.

Based on shallow soil near the buildings and low level Benzene levels in samples collected groundwater, vapor intrusion from this release appears unlikely.

- I. 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). Since the overall contaminant trends appear to be stable to decreasing, it appears that natural attenuation will be effective in reducing the contaminant mass.
- J. Identify how all exposure pathways (soil, groundwater, vapor) were removed and/or adequately addressed by immediate, interim and/or remedial action(s).
Any remaining exposure pathways will be addressed by natural attenuation.
- K. Identify any system hardware anticipated to be left in place after site closure, and explain the reasons why it will remain.
No system hardware was installed as part of the site investigation.
- L. 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.
Monitoring locations that currently exceed the NR140 PAL or ES include the following:

Monitoring Well MW-1: Currently shows an NR140 PAL exceedance for Benzene (2.95 ppb).
Monitoring Well MW-2: Currently shows an NR140 ES exceedance for Benzene (23.6 ppb).
Monitoring Well MW-8: Currently shows NR140 ES exceedances for Lead (17.5 ppb), Ethylbenzene (1,100 ppb), Naphthalene (620 ppb), Trimethylbenzenes (2,040 ppb), and Xylene (4,250 ppb).
Peizometer Well PZ-1: Currently shows an NR140 ES exceedance for Benzene (12.9 ppb) and NR140 PAL exceedances for Ethylbenzene (380 ppb), Naphthalene (97 ppb), Trimethylbenzenes (251 ppb), and Xylene (755 ppb).
- M. 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.
No vapor samples were collected as part of the site investigation.
- N. 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.
No surface water or sediment samples were collected.

5. Continuing Obligations: Includes all affected properties and rights-of-way (ROWs). In certain situations, maintenance plans are also required, and must be included in Attachment D.

Directions: For each of the 3 property types below, check all situations that apply to this closure request.

(NOTE: Monitoring wells to be transferred to another site are addressed in Attachment E.)

This situation applies to the following property or Right of Way (ROW):			Case Closure Situation - Continuing Obligation (database fees will apply, ii. - xiv.)	Maintenance Plan Required	
Property Type:					
Source Property	Affected Property (Off-Source)	ROW			
i.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	None of the following situations apply to this case closure request.	NA
ii.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Residual groundwater contamination exceeds ch. NR 140 ESs.	NA
iii.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Residual soil contamination exceeds ch. NR 720 RCLs.	NA
iv.				Monitoring Wells Remain:	
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	• Not Abandoned (filled and sealed)	NA
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	• Continued Monitoring (requested or required)	Yes
v.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Cover/Barrier/Engineered Cover or Control for (soil) direct contact pathways (includes vapor barriers)	Yes
vi.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Cover/Barrier/Engineered Cover or Control for (soil) groundwater infiltration pathway	Yes
vii.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Structural Impediment: impedes completion of investigation or remedial action (not as a performance standard cover)	NA
viii.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Residual soil contamination meets NR 720 industrial soil RCLs, land use is classified as industrial	NA
ix.	<input type="checkbox"/>	<input type="checkbox"/>	NA	Vapor Mitigation System (VMS) required due to exceedances of vapor risk screening levels or other health based concern	Yes
x.	<input type="checkbox"/>	<input type="checkbox"/>	NA	Vapor: Dewatering System needed for VMS to work effectively	Yes
xi.	<input type="checkbox"/>	<input type="checkbox"/>	NA	Vapor: Compounds of Concern in use: full vapor assessment could not be completed	NA
xii.	<input type="checkbox"/>	<input type="checkbox"/>	NA	Vapor: Commercial/industrial exposure assumptions used.	NA
xiii.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Vapor: Residual volatile contamination poses future risk of vapor intrusion	NA
xiv.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Site-specific situation: (e. g., fencing, methane monitoring, other) (<i>discuss with project manager before submitting the closure request</i>)	Site specific

6. 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. ATCP 93, Wis. Adm. Code, exist on the property? Yes No
- C. If the answer to question 6.B. is yes, is the leak detection system currently being monitored? Yes No

General Instructions

All information shall be legible. Providing illegible information will result in a submittal being considered incomplete until corrected. For each attachment (A-G), provide a Table of Contents page, listing all 'applicable' and 'not applicable' items by Closure Form titles (e.g., A.1. Groundwater Analytical Table, A.2. Soil Analytical Results Table, etc.). If any item is 'not applicable' to the case closure request, you must fully explain the reasons why.

Data Tables (Attachment A)

Directions for Data Tables:

- Use **bold** and italics font for information of importance on tables and figures. Use **bold** font for ch. NR 140, Wis. Adm. Code ES attainments or exceedances, and *italicized font* for ch. NR 140, Wis. Adm. Code, PAL attainments or exceedances.
- Use **bold** font to identify individual ch. NR 720 Wis. Adm. Code RCL exceedances. Tables should also include the corresponding groundwater pathway and direct contact pathway RCLs for comparison purposes. Cumulative hazard index and cumulative cancer risk exceedances should also be tabulated and identified on Tables A.2 and A.3.
- 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 (3)(c), Wis. Adm. Code, in the format required in s. NR 716.15(4)(e), 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. Soil Analytical Results Table, etc.).
- For required documents, each table (e.g., A.1., A.2., etc.) should be a separate Portable Document Format (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, potable wells) for which samples have been collected.
- A.2. Soil Analytical Results Table(s):** Table(s) showing **all** soil analytical results and collection dates. Indicate if sample was collected above or below the observed low water table (unsaturated versus saturated).
- A.3. Residual Soil Contamination Table(s):** Table(s) showing the analytical results of only the residual soil contamination at the time of closure. This table shall be a subset of table A.2 and should include only the soil sample locations that exceed an RCL. Indicate if sample was collected above or below the observed low water table (unsaturated versus saturated). Table A.3 is optional only if a total of fewer than 15 soil samples have been collected at the site.
- A.4. Vapor Analytical Table(s):** 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.5. 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, and time period for sample collection.
- A.6. 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.7. 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, Figures and Photos (Attachment B)

Directions for Maps, Figures and Photos:

- 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 11 x 17 inches, in a 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(4), 726.09(2) and 726.11(3), (5) and (6), Wis. Adm. Code.
- 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.
- Maps, figures and photos should be dated to reflect the most recent revision.
 - B.1. Location Maps**
 - B.1.a. Location Map:** A map outlining all properties within the contaminated site boundaries on a United States Geological Survey (U.S.G.S.) topographic map or plat map in sufficient detail to permit easy location of all affected 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 all affected 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 attaining or exceeding a ch. NR 140 ES, and/or in relation to the boundaries of soil contamination attaining or exceeding a RCL. Provide parcel identification numbers for all affected properties.
 - B.1.c. RR Sites Map:** From RR Sites Map ([http://dnrm.wi.gov/si/?Viewer=RR Sites](http://dnrm.wi.gov/si/?Viewer=RR%20Sites)) 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. Soil Contamination:** Figure(s) showing the location of **all** identified unsaturated soil contamination. Use a single contour to show the horizontal extent of each area of contiguous soil contamination that exceeds a soil to groundwater pathway RCL as determined under ch. NR 720.Wis. Adm. Code. A separate contour line should be used to indicate the horizontal extent of each area of contiguous soil contamination that exceeds a direct contact RCL exceedances (0-4 foot depth).
- B.2.b. Residual Soil Contamination:** Figure(s) showing only the locations of soil samples where unsaturated soil contamination remains at the time of closure (locations represented in Table A.3). Use a single contour to show the horizontal extent of each area of contiguous soil contamination that exceeds a soil to groundwater pathway RCL as determined under ch. NR 720 Wis. Adm. Code. A separate contour line should be used to indicate the horizontal extent of each area of contiguous soil contamination that exceeds a direct contact RCL exceedance (0-4 foot depth).

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 an RCL. Distinguish between direct contact and the groundwater pathway RCLs.
 - Source location(s) and lateral and vertical extent if groundwater contamination exceeds ch. NR 140 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.1.b.)
- 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, PAL and/or an 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 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 residual soil and groundwater contamination, including sub-slab, indoor air, soil vapor, soil gas, 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).
- B.5. Structural Impediment Photos:** One or more photographs documenting the structural impediment feature(s) which precluded a complete site investigation or remediation at the time of the closure request. The photographs should document the area that could not be investigated or remediated due to a structural impediment. The structural impediment should be indicated on Figures B.2.a and B.2.b.

Documentation of Remedial Action (Attachment C)**Directions for Documentation of Remedial Action:**

- 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 has already been submitted to the DNR, please note the title and date of the report for that particular document requested.
 - C.1. **Site investigation documentation**, that has not otherwise been submitted with the Site Investigation Report.
 - C.2. **Investigative waste** disposal documentation.
 - C.3. Provide a **description of the methodology** used along with all supporting documentation if the RCLs are different than those contained in the Department's RCL Spreadsheet available at: <http://dnr.wi.gov/topic/Brownfields/Professionals.html>.
 - 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.
 - C.6. **Other.** Include any other relevant documentation not otherwise noted above (This section may remain blank).

Maintenance Plan(s) and Photographs (Attachment D)**Directions for Maintenance Plans and Photographs:**

Attach a maintenance plan for each affected property (source property, each off-source affected property) with continuing obligations requiring future maintenance (e.g., direct contact, groundwater protection, vapor intrusion). See Site Summary section 5 for all affected property(s) requiring a maintenance plan. Maintenance plan guidance and/or templates for: 1) Cover/barrier systems; 2) Vapor intrusion; and 3) Monitoring wells, can be found at: <http://dnr.wi.gov/topic/Brownfields/Professionals.html#tabx3>

- D.1. Descriptions of maintenance action(s) required for maximizing effectiveness of the engineered control, vapor mitigation system, feature or other action for which maintenance is required:**
- Provide brief descriptions of the type, depth and location of residual contamination.

- Provide a description of the system/cover/barrier/monitoring well(s) to be maintained.
 - Provide a description of the maintenance actions required for maximizing effectiveness of the engineered control, vapor mitigation system, feature or other action for which maintenance is required.
 - Provide contact information, including the name, address and phone number of the individual or facility who will be conducting the maintenance.
- D.2. **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) all property boundaries.
- D.3. **Photographs** for site 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 shall be visible and discernible. Photographs shall be submitted with a title related to the site name and location, and the date on which it was taken.
- D.4. **Inspection log**, to be maintained on site, or at a location specified in the maintenance plan or approval letter. The inspection and maintenance log is found at: <http://dnr.wi.gov/files/PDF/forms/4400/4400-305.pdf>.

Monitoring Well Information (Attachment E)

Directions for Monitoring Well Information:

For all wells that will remain in use, be transferred to another party, or that could not be located; 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)

Select One:

- No monitoring wells were installed 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 a description of efforts made to locate the wells.
 - 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. When one or more monitoring wells will remain in use this is considered a continuing obligation and a maintenance plan will be required and must be included in Attachment D.
 - One or more monitoring 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). Provide documentation from the party accepting future responsibility for monitoring well(s).

Source Legal Documents (Attachment F)

Directions for Source Legal Documents:

Label documents with the specific closure form titles (e.g., F.1. Deed, F.2. Certified Survey Map, etc.). Include all of the following documents, in the order listed:

- F.1. **Deed:** The most recent deed with legal description clearly listed.
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.
- F.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. In cases where the certified survey map or recorded plat map are not legible or are unavailable, a copy of a parcel map from a county land information office may be substituted. A copy of a parcel map from a county land information office shall be legible, and the parcels identified in the legal description shall be clearly identified and labeled with the applicable parcel identification number.
- F.3. **Verification of Zoning:** Documentation (e.g., official zoning map or letter from municipality) of the property's or properties' current zoning status.
- F.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. This section applies to the source property only. Signed statements for Other Affected Properties should be included in Attachment G.

Notifications to Owners of Affected Properties (Attachment G)

Directions for Notifications to Owners of Affected Properties:

Complete the table on the following page for sites which require notification to owners of affected properties pursuant to ch. 292, Wis. Stats. and ch. NR 725 and 726, Wis. Adm. Code. 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.]. The DNR's "Guidance on Case Closure and the Requirements for Managing Continuing Obligations" (PUB-RR-606) lists specific notification requirements <http://dnr.wi.gov/files/PDF/pubs/rr/RR606.pdf>.

State law requires that the responsible party provide a 30-day, written advance notification 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. Use form 4400-286, Notification of Continuing Obligations and Residual Contamination, at <http://dnr.wi.gov/files/PDF/forms/4400/4400-286.pdf>

Include a copy of each notification sent and accompanying proof of delivery, i.e., return receipt or signature confirmation.

Include the following documents for each property, keeping each property's documents grouped together and labeled with the letter G and the corresponding ID number from the table on the following page. (Source Property documents should only be included in Attachment F):

- **Deed:** The most recent deed with legal descriptions clearly listed for all affected properties.
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.
- **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. In cases where the certified survey map or recorded plat map are not legible or are unavailable, a copy of a parcel map from a county land information office may be substituted. A copy of a parcel map from a county land information office shall be legible, and the parcels identified in the legal description shall be clearly identified and labeled with the applicable parcel identification number.
- **Verification of Zoning:** Documentation (e.g., official zoning map or letter from municipality) of the property's or properties' current zoning status.
- **Signed Statement:** A statement signed by the Responsible Party (RP), which states that he or she believes the attached legal description(s) accurately describe(s) the correct contaminated property or properties.

Signatures and Findings for Closure Determination

This page has been updated as of February 2019 to comply with the requirements of Wis. Admin. Code ch. NR 712.

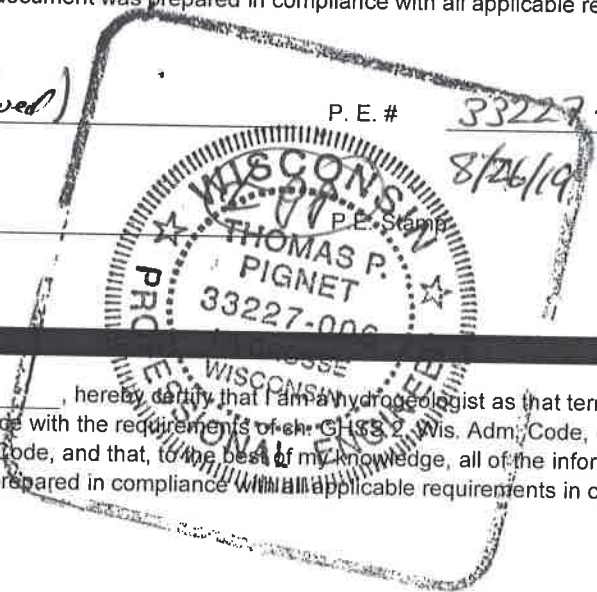
Check the correct box for this case closure request and complete the corresponding certification statement(s) listed below to demonstrate that the requirements of Wis. Admin. Code ch. NR 712 have been met. The responsibility for signing the certification may not be delegated per Wis. Admin. Code § NR 712.09 (1). Per Wis. Admin. Code § 712.05 (1), the work must be conducted or supervised by the person certifying.

- The investigation and/or response action(s) for this site evaluated and/or addressed groundwater (including natural attenuation remedies). Both a professional engineer and a hydrogeologist must sign this document per Wis. Admin. Code ch. NR 712.
- The investigation and the response action(s) for this site did not evaluate or address groundwater. A professional engineer must sign this document per Wis. Admin. Code ch. NR 712.

Engineering Certification

I, Thomas P. Pignet, 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 document has been prepared in accordance with the Rules of Professional Conduct in ch. A-E 8, Wis. Adm. Code; and that, to the best of my knowledge, all information contained in this document is correct and the document was prepared in compliance with all applicable requirements in chs. NR 700 to 726, Wis. Adm. Code.

Signature Thomas Pignet (reviewed) P. E. # 33227-006
 Title Engineer 8/26/19



Hydrogeologist Certification

I, Ronald Anderson, hereby certify that I am a hydrogeologist as that term is defined in s. NR 712.03 (1), Wis. Adm. Code, am registered in accordance with the requirements of ch. GHSS 2, Wis. Adm. Code, or licensed in accordance with the requirements of ch. GHSS 3, Wis. Adm. Code, and that, to the best of my knowledge, all of the information contained in this document is correct and the document was prepared in compliance with all applicable requirements in chs. NR 700 to 726, Wis. Adm. Code.

Signature Ronald Anderson
 Title SR. Hydrogeologist Date 8/28/19

Attachment A/Data Tables

A.1 Groundwater Analytical Tables

A.2 Soil Analytical Tables

A.3 Residual Soil Contamination Table

A.4 Vapor Analytical Table

A.5 Other Media of Concern - No surface waters or sediments were assessed as part of the site investigation.

A.6 Water Level Elevations

A.7 Other – Natural Attenuation Parameters, Slug Test Calculations, and Differential & Vertical Gradient Levels.

A.1 Groundwater Analytical Table

(Geoprobe)

Luedtke Property BRRTS #03-35-554426

Sample ID	Date	GRO (ppb)	Benzene (ppb)	Ethyl Benzene (ppb)	MTBE (ppb)	Naphthalene (ppb)	Toluene (ppb)	Trimethylbenzenes (ppb)	Xylene (Total) (ppb)
G-1-W	05/08/17	NS	6.8	11.2	<0.43	22.6	3.04	83.6	45.8
G-2-W	05/08/17	NS	36	360	<4.3	97	100	357	1660
G-3-W	05/08/17	NS	5.5	360	<4.3	114	56	316	1320
G-4-W	05/08/17	NS	<0.27	13.1	<0.43	41	1.11	28.1	15.21
G-5-W	05/08/17	NS	<0.27	<0.56	<0.43	<1.7	<0.33	<1.14	<1.71
G-6-W	05/08/17	NS	<5.4	202	<8.6	265	41	446	949
G-7-W	05/08/17	NS	39	9.2	<0.43	30.7	4.3	17.2	42.2
G-8-W	05/08/17	NS	19.1	2370	<21.5	750	92	1670	10600
G-9-W	05/08/17	NS	4.0	680	<4.3	440	72	1750	2800
G-10-W	05/08/17	NS	<13.5	320	<21.5	360	<16.5	2100	1110
G-11-W	05/08/17	NS	13	770	<8.6	227	96	814	1180
G-12-W	05/08/17	NS	9.1	330	<8.6	135	46	462	1117
G-13-W	05/09/17	NS	<0.27	<0.56	<0.43	<1.7	<0.33	<1.14	<1.71
G-14-W	05/09/17	NS	<i>0.94</i>	6.9	<0.43	<1.7	1.61	7.37	11.22
G-15-W	05/09/17	NS	5.7	1.01	<0.43	<1.7	0.44	1.5	1.27-1.88
G-16-W	05/09/17	NS	<0.27	<0.56	<0.43	<1.7	<0.33	<1.14	<1.71
G-17-W	05/09/17	NS	<0.27	<0.56	<0.43	<1.7	<0.33	<1.14	<1.71
G-18-W	05/09/17	NS	<0.27	<0.56	<0.43	<1.7	<0.33	<1.14	<1.71
G-19-W	05/09/17	NS	<0.27	<0.56	<0.43	<1.7	<0.33	<1.14	<1.71
G-20-W	05/09/17	NS	21.6	31.5	<0.43	43	96	305	132
G-21-W	05/09/17	NS	<i>0.92</i>	1.38	<0.43	1.95	2.94	16	4.88
G-22-W	05/09/17	NS	<0.27	<0.56	<0.43	<1.7	<0.33	<1.14	<1.71
G-23-W	05/09/17	NS	<0.27	<0.56	<0.43	<1.7	<0.33	<1.14	<1.71
G-24-W	05/09/17	NS	<0.27	<0.56	<0.43	<1.7	<0.33	<1.14	<1.71
G-25-W	05/09/17	NS	<0.27	<0.56	<0.43	<1.7	<0.33	<1.14	<1.71
ENFORCE MENT STANDARD ES = Bold		-	5	700	60	100	800	480	2000
<i>PREVENTIVE ACTION LIMIT PAL = Italics</i>		-	<i>0.5</i>	<i>140</i>	<i>12</i>	<i>10</i>	<i>160</i>	<i>96</i>	<i>400</i>

NS = Not Sampled

(ppb) = parts per billion

(ppm) = parts per million

DRO = Diesel Range Organics

GRO = Gasoline Range Organics

METCO

Environmental Consulting, Fuel System Design, Installation and Service

A.1 Groundwater Analytical Table
Luedtke Property BRRTS #03-35-554426

Well MW-1

PVC Elevation = 1447.71 (feet) (MSL)

Date	Water Elevation (in feet msl)	Depth to water from top of PVC (in feet)	Lead (ppb)	Benzene (ppb)	Ethyl Benzene (ppb)	MTBE (ppb)	Naphthalene (ppb)	Toluene (ppb)	Trimethylbenzenes (ppb)	Xylene (Total) (ppb)
01/29/18	1440.98	6.73	2.4	9.3	108	<2.8	99	3.5	429	414
04/30/18	1441.72	5.99	7.7	5.5	112	<2.8	79	3.9	357	341
09/19/18	1441.20	6.51	<0.8	5.6	24.3	<5.7	23.8	<4.5	60.8	44.9
12/10/18	1441.27	6.44	0.9	2.95	<0.26	<0.28	<2.1	<0.19	<1.43	<0.72
ENFORCEMENT STANDARD ES = Bold			15	5	700	60	100	800	480	2000
PREVENTIVE ACTION LIMIT PAL = Italics			<i>1.5</i>	<i>0.5</i>	<i>140</i>	<i>12</i>	<i>10</i>	<i>160</i>	<i>96</i>	<i>400</i>

(ppb) = parts per billion (ppm) = parts per million
 ns = not sampled nm = not measured
 Note: Elevations are presented in feet mean sea level (msl).

Well MW-2

PVC Elevation = 1448.05 (feet) (MSL)

Date	Water Elevation (in feet msl)	Depth to water from top of PVC (in feet)	Lead (ppb)	Benzene (ppb)	Ethyl Benzene (ppb)	MTBE (ppb)	Naphthalene (ppb)	Toluene (ppb)	Trimethylbenzenes (ppb)	Xylene (Total) (ppb)
01/29/18	1440.86	7.19	<0.9	19.2	16	<0.28	6.3	1.02	9	25.17
04/30/18	1441.68	6.37	<0.9	22.2	7.4	<0.28	4.8	0.93	4.8	33.4
09/19/18	1441.14	6.91	NS	25.7	4.3	<0.57	3.8	0.85	2.91	8.56
12/10/18	1441.15	6.90	NS	23.6	8.5	<0.57	5.2	0.93	6.26	11.96
ENFORCEMENT STANDARD ES = Bold			15	5	700	60	100	800	480	2000
PREVENTIVE ACTION LIMIT PAL = Italics			<i>1.5</i>	<i>0.5</i>	<i>140</i>	<i>12</i>	<i>10</i>	<i>160</i>	<i>96</i>	<i>400</i>

(ppb) = parts per billion (ppm) = parts per million
 ns = not sampled nm = not measured
 Note: Elevations are presented in feet mean sea level (msl).

Well MW-3

PVC Elevation = 1448.19 (feet) (MSL)

Date	Water Elevation (in feet msl)	Depth to water from top of PVC (in feet)	Lead (ppb)	Benzene (ppb)	Ethyl Benzene (ppb)	MTBE (ppb)	Naphthalene (ppb)	Toluene (ppb)	Trimethylbenzenes (ppb)	Xylene (Total) (ppb)
01/29/18	1440.80	7.39	<0.9	<2.2	69	<2.8	26.2	3.2	64	94
04/30/18	1441.69	6.50	<0.9	<0.22	1.8	<0.28	3.03	<0.19	<1.43	1.11
09/19/18	1441.12	7.07	NS	<0.22	<0.53	<0.57	<1.7	<0.45	<1.48	<1.58
12/10/18	1441.17	7.02	NS	<0.22	2.07	<0.57	4.7	0.5	1.36-2.11	0.94-1.94
ENFORCEMENT STANDARD ES = Bold			15	5	700	60	100	800	480	2000
PREVENTIVE ACTION LIMIT PAL = Italics			<i>1.5</i>	<i>0.5</i>	<i>140</i>	<i>12</i>	<i>10</i>	<i>160</i>	<i>96</i>	<i>400</i>

(ppb) = parts per billion (ppm) = parts per million
 ns = not sampled nm = not measured
 Note: Elevations are presented in feet mean sea level (msl).

A.1 Groundwater Analytical Table
Luedtke Property BRRTS #03-35-554426

Well MW-4

PVC Elevation = 1448.13 (feet) (MSL)

Date	Water Elevation (in feet msl)	Depth to water from top of PVC (in feet)	Lead (ppb)	Benzene (ppb)	Ethyl Benzene (ppb)	MTBE (ppb)	Naphthalene (ppb)	Toluene (ppb)	Trimethylbenzenes (ppb)	Xylene (Total) (ppb)
01/29/18	1440.88	7.25	<0.9	<0.22	<0.26	<0.28	<2.1	<0.19	<1.43	<0.72
04/30/18	1441.57	6.56	<0.9	<0.22	<0.26	<0.28	<2.1	<0.19	<1.43	<0.72
09/19/18	1441.13	7.00	NS	<0.22	<0.53	<0.57	<1.7	<0.45	<1.48	<1.58
12/10/18	1441.10	7.03	NS	<0.22	<0.53	<0.57	<1.7	<0.45	<1.48	<1.58
ENFORCEMENT STANDARD ES = Bold			15	5	700	60	100	800	480	2000
PREVENTIVE ACTION LIMIT PAL = Italics			<i>1.5</i>	<i>0.5</i>	<i>140</i>	<i>12</i>	<i>10</i>	<i>160</i>	<i>96</i>	<i>400</i>

(ppb) = parts per billion (ppm) = parts per million
 ns = not sampled nm = not measured

Note: Elevations are presented in feet mean sea level (msl).

Well MW-5

PVC Elevation = 1447.78 (feet) (MSL)

Date	Water Elevation (in feet msl)	Depth to water from top of PVC (in feet)	Lead (ppb)	Benzene (ppb)	Ethyl Benzene (ppb)	MTBE (ppb)	Naphthalene (ppb)	Toluene (ppb)	Trimethylbenzenes (ppb)	Xylene (Total) (ppb)
01/29/18	1441.03	6.75	<0.9	<0.22	<0.26	<0.28	<2.1	<0.19	<1.43	<0.72
04/30/18	1441.80	5.98	<0.9	<0.22	<0.26	<0.28	<2.1	<0.19	<1.43	<0.72
09/19/18	1441.23	6.55	NS	<0.22	<0.53	<0.57	<1.7	<0.45	<1.48	<1.58
12/10/18	1441.21	6.57	NS	<0.22	<0.53	<0.57	<1.7	<0.45	<1.48	<1.58
ENFORCEMENT STANDARD ES = Bold			15	5	700	60	100	800	480	2000
PREVENTIVE ACTION LIMIT PAL = Italics			<i>1.5</i>	<i>0.5</i>	<i>140</i>	<i>12</i>	<i>10</i>	<i>160</i>	<i>96</i>	<i>400</i>

(ppb) = parts per billion (ppm) = parts per million
 ns = not sampled nm = not measured

Note: Elevations are presented in feet mean sea level (msl).

Well MW-6

PVC Elevation = 1448.31 (feet) (MSL)

Date	Water Elevation (in feet msl)	Depth to water from top of PVC (in feet)	Lead (ppb)	Benzene (ppb)	Ethyl Benzene (ppb)	MTBE (ppb)	Naphthalene (ppb)	Toluene (ppb)	Trimethylbenzenes (ppb)	Xylene (Total) (ppb)
01/29/18	1441.04	7.27	<0.9	<0.22	<0.26	<0.28	<2.1	<0.19	<1.43	<0.72
04/30/18	1441.88	6.43	<0.9	<0.22	<0.26	<0.28	<2.1	<0.19	<1.43	<0.72
09/19/18	1441.28	7.03	NS	<0.22	<0.53	<0.57	<1.7	<0.45	<1.48	<1.58
12/10/18	1441.32	6.99	NS	<0.22	<0.53	<0.57	<1.7	<0.45	<1.48	<1.58
ENFORCEMENT STANDARD ES = Bold			15	5	700	60	100	800	480	2000
PREVENTIVE ACTION LIMIT PAL = Italics			<i>1.5</i>	<i>0.5</i>	<i>140</i>	<i>12</i>	<i>10</i>	<i>160</i>	<i>96</i>	<i>400</i>

(ppb) = parts per billion (ppm) = parts per million
 ns = not sampled nm = not measured

Note: Elevations are presented in feet mean sea level (msl).

A.1 Groundwater Analytical Table
Luedtke Property BRRTS #03-35-554426

Well MW-7

PVC Elevation = 1449.08 (feet) (MSL)

Date	Water Elevation (in feet msl)	Depth to water from top of PVC (in feet)	Lead (ppb)	Benzene (ppb)	Ethyl Benzene (ppb)	MTBE (ppb)	Naphthalene (ppb)	Toluene (ppb)	Trimethyl-benzenes (ppb)	Xylene (Total) (ppb)
01/29/18										
COULD NOT LOCATE										
04/30/18	1441.83	7.25	<0.9	<0.22	<0.26	<0.28	<2.1	<0.19	<1.43	<0.72
09/19/18	1441.18	7.90	NS	<0.22	<0.53	<0.57	<1.7	<0.45	<1.48	<1.58
12/10/18	1441.28	7.80	NS	<0.22	<0.53	<0.57	<1.7	<0.45	<1.48	<1.58
ENFORCEMENT STANDARD ES = Bold			15	5	700	60	100	800	480	2000
PREVENTIVE ACTION LIMIT PAL = Italics			<i>1.5</i>	<i>0.5</i>	<i>140</i>	<i>12</i>	<i>10</i>	<i>160</i>	<i>96</i>	<i>400</i>

(ppb) = parts per billion (ppm) = parts per million
 ns = not sampled nm = not measured
 Note: Elevations are presented in feet mean sea level (msl).

Well MW-8

PVC Elevation = 1448.40 (feet) (MSL)

Date	Water Elevation (in feet msl)	Depth to water from top of PVC (in feet)	Lead (ppb)	Benzene (ppb)	Ethyl Benzene (ppb)	MTBE (ppb)	Naphthalene (ppb)	Toluene (ppb)	Trimethyl-benzenes (ppb)	Xylene (Total) (ppb)
01/29/18	1440.99	7.41	21.2	<11	1600	<14	790	29	1940	5500
04/30/18	1441.82	6.58	20.9	<11	1560	<14	490	20.5	1860	3370
09/19/18	1441.24	7.16	20.9	<11	800	<28.5	488	<22.5	2100	2910
12/10/18	1441.27	7.13	17.5	<11	1100	<28.5	620	27	2040	4250
ENFORCEMENT STANDARD ES = Bold			15	5	700	60	100	800	480	2000
PREVENTIVE ACTION LIMIT PAL = Italics			<i>1.5</i>	<i>0.5</i>	<i>140</i>	<i>12</i>	<i>10</i>	<i>160</i>	<i>96</i>	<i>400</i>

(ppb) = parts per billion (ppm) = parts per million
 ns = not sampled nm = not measured
 Note: Elevations are presented in feet mean sea level (msl).

Well PZ-1

PVC Elevation = 1447.59 (feet) (MSL)

Date	Water Elevation (in feet msl)	Depth to water from top of PVC (in feet)	Lead (ppb)	Benzene (ppb)	Ethyl Benzene (ppb)	MTBE (ppb)	Naphthalene (ppb)	Toluene (ppb)	Trimethyl-benzenes (ppb)	Xylene (Total) (ppb)
01/29/18	1438.98	8.61	<0.9	7.6	311	<2.8	65	42	248	816
04/30/18	1439.88	7.71	1.5	<2.2	430	<2.8	123	38	417	804
09/19/18	1439.22	8.37	<0.8	12.8	380	<5.7	77	50	264	777
12/10/18	1439.15	8.44	<0.8	12.9	380	<0.57	97	55	251	755
ENFORCEMENT STANDARD ES = Bold			15	5	700	60	100	800	480	2000
PREVENTIVE ACTION LIMIT PAL = Italics			<i>1.5</i>	<i>0.5</i>	<i>140</i>	<i>12</i>	<i>10</i>	<i>160</i>	<i>96</i>	<i>400</i>

(ppb) = parts per billion (ppm) = parts per million
 ns = not sampled nm = not measured
 Note: Elevations are presented in feet mean sea level (msl).

A.2 Soil Analytical Results Table
 Luettke Property BRRS #03-35-554426

Sample ID	Depth (feet)	Saturation U/S	Date	PID	Lead (ppm)	DRO (ppm)	GRO (ppm)	Benzene (ppm)	Ethyl Benzene (ppm)	MTBE (ppm)	Naphthalene (ppm)	Toluene (ppm)	1,2,4-Trime-thylbenzene (ppm)	1,3,5-Trime-thylbenzene (ppm)	Xylene (Total) (ppm)	Other VOC's (ppb)	DIRECT CONTACT PVOC & PAH COMBINED		
																	Exceedance Count	Hazard Index	Cumulative Cancer Risk
PZ-1-1	3.5	U	11/13/17	0.2													NS	0	
PZ-1-2					NO RECOVERY											NS			
PZ-1-3	12	S	11/13/17	23.1													NS		
PZ-1-4	16	S	11/13/17	42													NS		
PZ-1-5	20	S	11/13/17	14.2													NS		
PZ-1-6	24	S	11/13/17	8.0													NS		
PZ-1-7	28	S	11/13/17	5.0													NS		
PZ-1-8	30	S	11/13/17	2.0													NS		
MW-1-1	4	U	11/13/17	0.1													NS	0	
MW-1-2					NO RECOVERY											NS			
MW-1-3	8	S	11/13/17	24.5	NS	NS	NS	0.052	0.059	<0.025	<0.025	<0.025	0.066	<0.025	0.242		NS		
MW-1-4	15	S	11/13/17	25.7													NS		
MW-2-1	3.5	U	11/13/17	0.1	NS	NS	NS	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.075		NS	0	
MW-2-2					NO RECOVERY											NS			
MW-2-3	9	S	11/13/17	1.1	NS	NS	NS	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.075		NS		
MW-2-4	15	S	11/13/17	2.3	NS	NS	NS	<0.025	0.061	<0.025	0.040	<0.025	0.102	0.032	0.220		NS		
MW-3-1	3.5	U	11/13/17	0.4													NS	0	
MW-3-2	8	S	11/13/17	0.1													NS		
MW-3-3	10	S	11/13/17	12.6	NS	NS	NS	<0.025	0.051	<0.025	0.0303	<0.025	0.052	0.0276	0.094-0.119		NS		
MW-3-4	15	S	11/13/17	6.3	NS	NS	NS	<0.025	0.038	<0.025	0.0277	<0.025	<0.025	<0.025	0.064-0.089		NS		
MW-4-1	3.5	U	11/14/17	0.1													NS	0	
MW-4-2	8	S	11/14/17	0.1													NS		
MW-4-3	12	S	11/14/17	0.3													NS		
MW-4-4	15	S	11/14/17	0.5													NS		
MW-5-1	3.5	U	11/14/17	0.5													NS		
MW-5-2	8	S	11/14/17	0.7													NS	0	
MW-5-3	12	S	11/14/17	0.8													NS		
MW-5-4	15	S	11/14/17	0.7													NS		
MW-6-1	3.5	U	11/14/17	0.5													NS		
MW-6-2	8	S	11/14/17	0.6													NS	0	
MW-6-3	12	S	11/14/17	0.4													NS		
MW-6-4	15	S	11/14/17	0.8													NS		
MW-7-1	3.5	U	11/14/17	0.4													NS		
MW-7-2	8.0	S	11/14/17	0.4													NS		
MW-7-3	12.0	S	11/14/17	0.7													NS		
MW-7-4	15.0	S	11/14/17	0.6													NS		
MW-8-1	3.5	U	11/14/17	0.2	NS	NS	NS	<0.025	<0.025	<0.025	0.0282	<0.025	<0.025	<0.025	<0.075		NS		
MW-8-2	8.0	S	11/14/17	377	NS	NS	1640	3.3	35	<0.125	19.6	4.6	98	36	135.8		NS		
MW-8-3	12.0	S	11/14/17	340													NS		
MW-8-4	15.0	S	11/14/17	34	NS	NS	NS	<0.025	0.129	<0.025	0.057	<0.025	<0.025	0.050	<0.075		NS		
DRUM COMPO-SITE			11/14/17	NS	NS	NS	172	<0.05	0.43	<0.05	1.53	0.095	7.0	4.0	2.51	<0.1 TCLP LEAD			
Groundwater RCL					27.00	-	-	0.00512	1.57	0.027	0.6582	1.11	1.38		3.96				
Non-Industrial Direct Contact RCL					400.00	-	-												
Industrial Direct Contact RCL					(800)	-	-	(7.07)	(35.4)	(282)	(24.1)	(818)	(219)	(182)	(258)			1.00E+00	1.00E-05
Soil Saturation Concentration (C-sat)*					-	-	-	1820*	480*	8870*	-	818*	219*	182*	258*			1.00E+00	1.00E-05

Bold = Groundwater RCL Exceedance
Bold & Underline = Non Industrial Direct Contact RCL Exceedance
(Bold & Parentheses) = Industrial Direct Contact RCL Exceedance
Bold & Asteric * = C-sat Exceedance
Italics = Industrial Direct Contact RCL
 NS = Not Sampled
 (ppm) = parts per million
 DRO = Diesel Range Organics
 GRO = Gasoline Range Organics
 PID = Photoionization Detector
 PVOC's = Petroleum Volatile Organic Compounds
 VOC's = Volatile Organic Compounds
 Note: Non-Industrial RCLs apply to this site.

U=UNSATURATED (BASED ON ALL TIME LOW WATER TABLE PER WDNR)
 S=SATURATED (BASED ON ALL TIME LOW WATER TABLE PER WDNR)

A.2 Soil Analytical Results Table
Luedtke Property BRRS #03-35-554426

Sampling Conducted on May 8, 2017

VOC's		Bold = Groundwater RCL	<u>Underline &</u> Bold = Non- <u>Industrial</u> Direct Contact RCL	(Parenthesis & Bold) = Industrial Direct Contact RCL	Asteric * & Bold =Soil Saturation (C- sat) RCL
Sample ID#	G-8-2				
Sample Depth/ft.	8				
Solids Percent	86.2				
Lead/ppm	11.8	27	<u>400</u>	(800)	==
Benzene/ppm	< 0.15	0.00512	<u>1.6</u>	(7.07)	1820*
Bromobenzene/ppm	< 0.125	==	<u>342</u>	(679)	==
Bromodichloromethane/ppm	< 0.37	0.000326	<u>0.418</u>	(1.83)	==
Bromoform/ppm	< 0.145	0.00233	<u>25.4</u>	(113)	==
tert-Butylbenzene/ppm	< 0.13	==	<u>183</u>	(183)	183*
sec-Butylbenzene/ppm	1.13	==	<u>145</u>	(145)	145*
n-Butylbenzene/ppm	5.4	==	<u>108</u>	(108)	108*
Carbon Tetrachloride/ppm	< 0.08	0.00388	<u>0.916</u>	(4.03)	==
Chlorobenzene/ppm	< 0.065	==	<u>370</u>	(761)	761*
Chloroethane/ppm	< 0.455	0.227	==	==	==
Chloroform/ppm	< 0.175	0.0033	<u>0.454</u>	(1.98)	==
Chloromethane/ppm	< 0.38	0.0155	<u>159</u>	(669)	==
2-Chlorotoluene/ppm	< 0.075	==	==	==	==
4-Chlorotoluene/ppm	< 0.09	==	==	==	==
1,2-Dibromo-3-chloropropane/ppm	< 0.29	0.000173	<u>0.008</u>	(0.092)	==
Dibromochloromethane/ppm	< 0.125	0.032	<u>8.28</u>	(38.9)	==
1,4-Dichlorobenzene/ppm	< 0.185	0.144	<u>3.74</u>	(16.4)	==
1,3-Dichlorobenzene/ppm	< 0.185	1.1528	<u>297</u>	(193)	297*
1,2-Dichlorobenzene/ppm	< 0.14	1.168	<u>376</u>	(376)	376*
Dichlorodifluoromethane/ppm	< 0.24	3.0863	<u>126</u>	(530)	==
1,2-Dichloroethane/ppm	< 0.19	0.00284	<u>0.652</u>	(2.87)	540*
1,1-Dichloroethane/ppm	< 0.17	0.4834	<u>5.06</u>	(22.2)	==
1,1-Dichloroethene/ppm	< 0.11	0.00502	<u>320</u>	(1190)	1190*
cis-1,2-Dichloroethene/ppm	< 0.16	0.0412	<u>156</u>	(2340)	==
trans-1,2-Dichloroethene/ppm	< 0.14	0.626	<u>1560</u>	(1850)	==
1,2-Dichloropropane/ppm	< 0.175	0.00332	<u>0.406</u>	(1.78)	==
1,3-Dichloropropane/ppm	< 0.125	==	<u>1490</u>	(1490)	1490*
trans-1,3-Dichloropropene/ppm	< 0.11		<u>1510</u>	(1510)	==
cis-1,3-Dichloropropene/ppm	< 0.195	0.001	<u>1210</u>	(1210)	==
Di-isopropyl ether/ppm	< 0.05	==	<u>2260</u>	(2260)	2260*
EDB (1,2-Dibromoethane)/ppm	< 0.115	0.0000282	<u>0.05</u>	(0.221)	==
Ethylbenzene/ppm	2.11	1.57	<u>8.02</u>	(35.4)	480*
Hexachlorobutadiene/ppm	< 0.425	==	<u>1.63</u>	(7.19)	==
Isopropylbenzene/ppm	0.9	==	==	==	==
p-Isopropyltoluene/ppm	1.4	==	<u>162</u>	(162)	162*
Methylene chloride/ppm	< 0.75	0.00256	<u>61.8</u>	(1150)	==
Methyl tert-butyl ether (MTBE)/ppm	< 0.25	0.027	<u>63.8</u>	(282)	8870*
Naphthalene/ppm	5.6	0.6582	<u>5.52</u>	(24.1)	==
n-Propylbenzene/ppm	3.8	==	==	==	==
1,1,2,2-Tetrachloroethane/ppm	< 0.14	0.000156	<u>0.81</u>	(3.6)	==
1,1,1,2-Tetrachloroethane/ppm	< 0.14	0.0534	<u>2.78</u>	(12.3)	==
Tetrachloroethene (PCE)/ppm	< 0.16	0.00454	<u>33</u>	(145)	==
Toluene/ppm	< 0.16	1.11	<u>818</u>	(818)	818*
1,2,4-Trichlorobenzene/ppm	< 0.32	0.408	<u>24</u>	(113)	==
1,2,3-Trichlorobenzene/ppm	< 0.33	==	<u>62.6</u>	(934)	==
1,1,1-Trichloroethane/ppm	< 0.15	0.1402	==	==	==
1,1,2-Trichloroethane/ppm	< 0.165	0.00324	<u>1.59</u>	(7.01)	==
Trichloroethene (TCE)/ppm	< 0.205	0.00358	<u>1.3</u>	(8.41)	==
Trichlorofluoromethane/ppm	< 0.205	2.2387	<u>1230</u>	(1230)	1230*
1,2,4-Trimethylbenzene/ppm	32	1.38	<u>219</u>	(219)	219*
1,3,5-Trimethylbenzene/ppm	9.7		<u>182</u>	(182)	182*
Vinyl Chloride/ppm	< 0.095	0.000138	<u>0.07</u>	(2.08)	==
m&p-Xylene/ppm	7.8	3.96	<u>260</u>	(260)	258*
o-Xylene/ppm	3.9				

NS = not sampled, NM = Not Measured

(ppm) = parts per million

== No Exceedences

"J" Flag: Analyte detected between LOD and LOQ LOD Limit of Detection LOQ Limit of Quantitation

A.3 Residual Soil Analytical Results Table
Luedtke Property BRRTS #03-35-554426

Sample ID	Depth (feet)	Saturation U/S	Date	PID	Lead (ppm)	DRO (ppm)	GRO (ppm)	Benzene (ppm)	Ethyl Benzene (ppm)	MTBE (ppm)	Naphthalene (ppm)	Toluene (ppm)	1,2,4-Trime-thylbenzene (ppm)	1,3,5-Trime-thylbenzene (ppm)	Xylene (Total) (ppm)	Other VOC's (ppb)	DIRECT CONTACT		
																	Exeedance Count	Hazard Index	Cumulative Cancer Risk
G-2-3	10.0	S	05/08/17	10.4	NS	NS	NS	0.030	0.073	<0.025	<0.025	<0.025	0.078	<0.025	0.383	NS			
G-4-1	3.5	U	05/08/17	0.6	35.8	NS	NS	<0.025	<0.025	<0.025	0.081	0.080	0.043	<0.025	0.132	NS	0		
G-5-1	3.5	U	05/08/17	0.5	132	NS	NS	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.075	NS	0	0.3300	
G-6-3	9.0	S	05/08/17	229	NS	NS	NS	<0.025	0.289	<0.025	3.1	0.079	3.3	1.17	2.00	NS			
G-7-3	8.5	S	05/08/17	149	NS	NS	NS	0.072	0.065	<0.025	0.063	<0.025	0.060	0.0287	0.316	NS			
G-8-1	3.5	U	05/08/17	9	44	NS	NS	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.075	NS	0		
G-8-2	8.0	S	05/08/17	975	11.8	NS	NS	<0.15	2.11	<0.25	5.6	<0.16	32	9.7	11.70	SEE VOC SHEET			
G-9-2	8.0	S	05/08/17	319	NS	NS	NS	<0.125	0.32	<0.125	2.63	<0.125	8.5	9.9	3.27	NS			
G-10-2	8.0	S	05/08/17	1044	NS	NS	NS	0.79	1.87	<0.125	2.1	2.11	41	26	13.58	NS			
G-11-3	9.0	S	05/08/17	35	NS	NS	NS	0.032	0.0305	<0.025	<0.025	<0.025	0.094	0.032	0.32	NS			
G-20-3	9.0	S	05/09/17	5000	NS	NS	NS	<0.025	0.135	<0.025	2.12	0.115	0.64	2.51	1.05	NS			
MW-1-3	8	S	11/13/17	24.5	NS	NS	NS	0.052	0.059	<0.025	<0.025	<0.025	0.066	<0.025	0.242	NS			
MW-8-2	8.0	S	11/14/17	377	NS	NS	1640	3.3	35	<0.125	19.6	4.6	98	36	135.8	NS			
Groundwater RCL					27.00	-	-	0.00512	1.57	0.027	0.6582	1.11	1.38		3.96	-			
Non-Industrial Direct Contact RCL					400.00	-	-	1.6	8.02	63.8	5.52	818	219	182	260	-			
Industrial Direct Contact RCL					(800)	-	-	(7.07)	(35.4)	(282)	(24.1)	(818)	(219)	(182)	(260)	-	1.00E+00	1.00E-05	
Soil Saturation Concentration (C-sat)*					-	-	-	1820*	480*	8870*	-	818*	219*	182*	260*	-	1.00E+00	1.00E-05	

Bold = Groundwater RCL Exceedance

Bold & Underline = Non Industrial Direct Contact RCL Exceedance

(Bold & Parentheses) = Industrial Direct Contact RCL Exceedance

Bold & Asteric * = C-sat Exceedance

NS = Not Sampled

NM = Not Measured

(ppm) = parts per million

ND = No Detects

DRO = Diesel Range Organics

GRO = Gasoline Range Organics

PID = Photoionization Detector

PVOC's = Petroleum Volatile Organic Compounds

VOC's = Volatile Organic Compounds

Note: Non-Industrial RCLs apply to this site.

U=UNSATURATED (BASED ON ALL TIME LOW WATER TABLE PER WDNR)

S=SATURATED (BASED ON ALL TIME LOW WATER TABLE PER WDNR)

A.3 Residual Soil Analytical Results Table
Luedtke Property BRRTS #03-35-554426

Sampling Conducted on May 8, 2017

VOC's		Bold = Groundwater RCL	<u>Underline &</u> Bold = Non- <u>Industrial</u> Direct Contact RCL	(Parenthesis & Bold) = Industrial Direct Contact RCL	Asteric * & Bold =Soil Saturation (C- sat) RCL
Sample ID#	G-8-2				
Sample Depth/ft.	8				
Solids Percent	86.2				
Lead/ppm	11.8	27	<u>400</u>	(800)	==
Benzene/ppm	< 0.15	0.00512	<u>1.6</u>	(7.07)	1820*
Bromobenzene/ppm	< 0.125	==	<u>342</u>	(679)	==
Bromodichloromethane/ppm	< 0.37	0.000326	<u>0.418</u>	(1.83)	==
Bromoform/ppm	< 0.145	0.00233	<u>25.4</u>	(113)	==
tert-Butylbenzene/ppm	< 0.13	==	<u>183</u>	(183)	183*
sec-Butylbenzene/ppm	1.13	==	<u>145</u>	(145)	145*
n-Butylbenzene/ppm	5.4	==	<u>108</u>	(108)	108*
Carbon Tetrachloride/ppm	< 0.08	0.00388	<u>0.916</u>	(4.03)	==
Chlorobenzene/ppm	< 0.065	==	<u>370</u>	(761)	761*
Chloroethane/ppm	< 0.455	0.227	==	==	==
Chloroform/ppm	< 0.175	0.0033	<u>0.454</u>	(1.98)	==
Chloromethane/ppm	< 0.38	0.0155	<u>159</u>	(669)	==
2-Chlorotoluene/ppm	< 0.075	==	==	==	==
4-Chlorotoluene/ppm	< 0.09	==	==	==	==
1,2-Dibromo-3-chloropropane/ppm	< 0.29	0.000173	<u>0.008</u>	(0.092)	==
Dibromochloromethane/ppm	< 0.125	0.032	<u>8.28</u>	(38.9)	==
1,4-Dichlorobenzene/ppm	< 0.185	0.144	<u>3.74</u>	(16.4)	==
1,3-Dichlorobenzene/ppm	< 0.185	1.1528	<u>297</u>	(193)	297*
1,2-Dichlorobenzene/ppm	< 0.14	1.168	<u>376</u>	(376)	376*
Dichlorodifluoromethane/ppm	< 0.24	3.0863	<u>126</u>	(530)	==
1,2-Dichloroethane/ppm	< 0.19	0.00284	<u>0.652</u>	(2.87)	540*
1,1-Dichloroethane/ppm	< 0.17	0.4834	<u>5.06</u>	(22.2)	==
1,1-Dichloroethene/ppm	< 0.11	0.00502	<u>320</u>	(1190)	1190*
cis-1,2-Dichloroethene/ppm	< 0.16	0.0412	<u>156</u>	(2340)	==
trans-1,2-Dichloroethene/ppm	< 0.14	0.626	<u>1560</u>	(1850)	==
1,2-Dichloropropane/ppm	< 0.175	0.00332	<u>0.406</u>	(1.78)	==
1,3-Dichloropropane/ppm	< 0.125	==	<u>1490</u>	(1490)	1490*
trans-1,3-Dichloropropene/ppm	< 0.11		<u>1510</u>	(1510)	==
cis-1,3-Dichloropropene/ppm	< 0.195	0.001	<u>1210</u>	(1210)	==
Di-isopropyl ether/ppm	< 0.05	==	<u>2260</u>	(2260)	2260*
EDB (1,2-Dibromoethane)/ppm	< 0.115	0.0000282	<u>0.05</u>	(0.221)	==
Ethylbenzene/ppm	2.11	1.57	<u>8.02</u>	(35.4)	480*
Hexachlorobutadiene/ppm	< 0.425	==	<u>1.63</u>	(7.19)	==
Isopropylbenzene/ppm	0.9	==	==	==	==
p-Isopropyltoluene/ppm	1.4	==	<u>162</u>	(162)	162*
Methylene chloride/ppm	< 0.75	0.00256	<u>61.8</u>	(1150)	==
Methyl tert-butyl ether (MTBE)/ppm	< 0.25	0.027	<u>63.8</u>	(282)	8870*
Naphthalene/ppm	5.6	0.6582	<u>5.52</u>	(24.1)	==
n-Propylbenzene/ppm	3.8	==	==	==	==
1,1,2,2-Tetrachloroethane/ppm	< 0.14	0.000156	<u>0.81</u>	(3.6)	==
1,1,1,2-Tetrachloroethane/ppm	< 0.14	0.0534	<u>2.78</u>	(12.3)	==
Tetrachloroethene (PCE)/ppm	< 0.16	0.00454	<u>33</u>	(145)	==
Toluene/ppm	< 0.16	1.11	<u>818</u>	(818)	818*
1,2,4-Trichlorobenzene/ppm	< 0.32	0.408	<u>24</u>	(113)	==
1,2,3-Trichlorobenzene/ppm	< 0.33	==	<u>62.6</u>	(934)	==
1,1,1-Trichloroethane/ppm	< 0.15	0.1402	==	==	==
1,1,2-Trichloroethane/ppm	< 0.165	0.00324	<u>1.59</u>	(7.01)	==
Trichloroethene (TCE)/ppm	< 0.205	0.00358	<u>1.3</u>	(8.41)	==
Trichlorofluoromethane/ppm	< 0.205	2.2387	<u>1230</u>	(1230)	1230*
1,2,4-Trimethylbenzene/ppm	32	1.38	<u>219</u>	(219)	219*
1,3,5-Trimethylbenzene/ppm	9.7		<u>182</u>	(182)	182*
Vinyl Chloride/ppm	< 0.095	0.000138	<u>0.07</u>	(2.08)	==
m&p-Xylene/ppm	7.8	3.96	<u>260</u>	(260)	258*
o-Xylene/ppm	3.9				

NS = not sampled, NM = Not Measured

(ppm) = parts per million

== No Exceedences

"J" Flag: Analyte detected between LOD and LOQ LOD Limit of Detection LOQ Limit of Quantitation

**A.6 Water Level Elevations
Luedtke Property BRRTS #03-35-554426
Tomahawk, Wisconsin**

	MW-1	MW-2	MW-3	MW-4	MW-5	MW-6	MW-7	MW-8	PZ-1
Ground Surface (feet msl)	1448.15	1448.43	1448.80	1448.52	1448.23	1448.66	1449.44	1448.71	1448.13
PVC top (feet msl)	1447.71	1448.05	1448.19	1448.13	1447.78	1448.31	1449.08	1448.40	1447.59
Well Depth (feet)	15.00	15.00	15.00	15.00	15.00	15.00	15.00	15.00	30.00
Top of screen (feet msl)	1443.15	1443.43	1443.80	1443.52	1443.23	1443.66	1444.44	1443.71	1423.13
Bottom of screen (feet msl)	1433.15	1433.43	1433.80	1433.52	1433.23	1433.66	1434.44	1433.71	1418.13

Depth to Water From Top of PVC (feet)

01/29/18	6.73	7.19	7.39	7.25	6.75	7.27	CNL	7.41	8.61
04/30/18	5.99	6.37	6.50	6.56	5.98	6.43	7.25	6.58	7.71
09/19/18	6.51	6.91	7.07	7.00	6.55	7.03	7.90	7.16	8.37
12/10/18	6.44	6.90	7.02	7.03	6.57	6.99	7.80	7.13	8.44

Depth to Water From Ground Surface (feet)

01/29/18	7.17	7.57	8.00	7.64	7.20	7.62	CNL	7.72	9.15
04/30/18	6.43	6.75	7.11	6.95	6.43	6.78	7.61	6.89	8.25
09/19/18	6.95	7.29	7.68	7.39	7.00	7.38	8.26	7.47	8.91
12/10/18	6.88	7.28	7.63	7.42	7.02	7.34	8.16	7.44	8.98

Groundwater Elevation (feet msl)

01/29/18	1440.98	1440.86	1440.80	1440.88	1441.03	1441.04	CNL	1440.99	1438.98
04/30/18	1441.72	1441.68	1441.69	1441.57	1441.80	1441.88	1441.83	1441.82	1439.88
09/19/18	1441.20	1441.14	1441.12	1441.13	1441.23	1441.28	1441.18	1441.24	1439.22
12/10/18	1441.27	1441.15	1441.17	1441.10	1441.21	1441.32	1441.28	1441.27	1439.15

CNL = Could Not Locate

**A.7 Other
Groundwater NA Indicator Results
Luedtke Property BRRTS #03-35-554426**

Well MW-1

Date	Dissolved Oxygen (ppm)	pH	ORP	Temp (C)	Specific Conductance	Nitrate + Nitrite (ppm)	Total Sulfate (ppm)	Dissolved Iron (ppm)	Manganese (ppb)
01/29/18	3.94	6.20	36.4	6.33	1813	<0.36	21.4	5.68	1040
04/30/18	1.18	6.49	21	7.80	1910	NS	NS	NS	NS
09/19/18	1.53	7.11	-30	17.90	3.9	NS	NS	NS	NS
12/10/18	3.24	6.59	-62.3	7.41	714.0	NS	NS	NS	NS
ENFORCEMENT STANDARD = ES – Bold						10	-	-	300
PREVENTIVE ACTION LIMIT = <i>PAL - Italics</i>						2	-	-	60

(ppb) = parts per billion (ppm) = parts per million
 ns = not sampled nm = not measured ORP = Oxidation Reduction Potential
 Note: Elevations are presented in feet mean sea level (msl).

Well MW-2

Date	Dissolved Oxygen (ppm)	pH	ORP	Temp (C)	Specific Conductance	Nitrate + Nitrite (ppm)	Total Sulfate (ppm)	Dissolved Iron (ppm)	Manganese (ppb)
01/29/18	3.46	5.54	101.8	7.73	1411	<0.36	9.90	10.1	2270
04/30/18	0.57	5.89	72	9.50	985	NS	NS	NS	NS
09/19/18	1.81	6.48	85	17.00	1.4	NS	NS	NS	NS
12/10/18	3.47	5.64	-31.0	4.95	1631.0	NS	NS	NS	NS
ENFORCEMENT STANDARD = ES – Bold						10	-	-	300
PREVENTIVE ACTION LIMIT = <i>PAL - Italics</i>						2	-	-	60

(ppb) = parts per billion (ppm) = parts per million
 ns = not sampled nm = not measured ORP = Oxidation Reduction Potential
 Note: Elevations are presented in feet mean sea level (msl).

Well MW-3

Date	Dissolved Oxygen (ppm)	pH	ORP	Temp (C)	Specific Conductance	Nitrate + Nitrite (ppm)	Total Sulfate (ppm)	Dissolved Iron (ppm)	Manganese (ppb)
01/29/18	3.14	6.50	32.8	10.16	717	<0.36	38.6	0.98	839
04/30/18	2.56	7.32	225	11.70	1170	NS	NS	NS	NS
09/19/18	1.28	8.20	231	17.10	1.0	NS	NS	NS	NS
12/10/18	3.40	6.72	-37.5	5.58	1077.0	NS	NS	NS	NS
ENFORCEMENT STANDARD = ES – Bold						10	-	-	300
PREVENTIVE ACTION LIMIT = <i>PAL - Italics</i>						2	-	-	60

(ppb) = parts per billion (ppm) = parts per million
 ns = not sampled nm = not measured ORP = Oxidation Reduction Potential
 Note: Elevations are presented in feet mean sea level (msl).

A.7 Other
Groundwater NA Indicator Results
Luedtke Property BRRTS #03-35-554426

Well MW-4

Date	Dissolved Oxygen (ppm)	pH	ORP	Temp (C)	Specific Conductance	Nitrate + Nitrite (ppm)	Total Sulfate (ppm)	Dissolved Iron (ppm)	Manganese (ppb)
01/29/18	5.30	7.35	257.9	7.22	369	2.16	33.8	0.18	36.8
04/30/18	5.35	6.41	222	10.00	944	NS	NS	NS	NS
09/19/18	1.67	7.10	188	16.80	1.7	NS	NS	NS	NS
12/10/18	3.39	6.22	-23.3	5.09	3789.0	NS	NS	NS	NS
ENFORCEMENT STANDARD = ES – Bold						10	-	-	300
PREVENTIVE ACTION LIMIT = PAL - Italics						2	-	-	60

(ppb) = parts per billion (ppm) = parts per million
 ns = not sampled nm = not measured ORP = Oxidation Reduction Potential
 Note: Elevations are presented in feet mean sea level (msl).

Well MW-5

Date	Dissolved Oxygen (ppm)	pH	ORP	Temp (C)	Specific Conductance	Nitrate + Nitrite (ppm)	Total Sulfate (ppm)	Dissolved Iron (ppm)	Manganese (ppb)
01/29/18	7.28	7.65	230.7	5.14	680	2.13	19.7	<0.03	9.0
04/30/18	5.80	7.64	201	9.70	559	NS	NS	NS	NS
09/19/18	1.90	8.23	246	18.70	1.9	NS	NS	NS	NS
12/10/18	3.57	7.04	-13.4	3.60	2525.0	NS	NS	NS	NS
ENFORCEMENT STANDARD = ES – Bold						10	-	-	300
PREVENTIVE ACTION LIMIT = PAL - Italics						2	-	-	60

(ppb) = parts per billion (ppm) = parts per million
 ns = not sampled nm = not measured ORP = Oxidation Reduction Potential
 Note: Elevations are presented in feet mean sea level (msl).

Well MW-6

Date	Dissolved Oxygen (ppm)	pH	ORP	Temp (C)	Specific Conductance	Nitrate + Nitrite (ppm)	Total Sulfate (ppm)	Dissolved Iron (ppm)	Manganese (ppb)
01/29/18	5.59	7.72	291.1	7.43	304	1.18	18.5	0.05	27.2
04/30/18	9.16	7.39	257	7.4	290.9	NS	NS	NS	NS
09/19/18	2.65	7.66	313	15.30	0.4	NS	NS	NS	NS
12/10/18	3.55	6.90	-1.4	3.65	421.0	NS	NS	NS	NS
ENFORCEMENT STANDARD = ES – Bold						10	-	-	300
PREVENTIVE ACTION LIMIT = PAL - Italics						2	-	-	60

(ppb) = parts per billion (ppm) = parts per million
 ns = not sampled nm = not measured ORP = Oxidation Reduction Potential
 Note: Elevations are presented in feet mean sea level (msl).

A.7 Other
Groundwater NA Indicator Results
Luedtke Property BRRTS #03-35-554426

Well MW-7

Date	Dissolved Oxygen (ppm)	pH	ORP	Temp (C)	Specific Conductance	Nitrate + Nitrite (ppm)	Total Sulfate (ppm)	Dissolved Iron (ppm)	Manganese (ppb)
01/29/18	COULD NOT LOCATE								
04/30/18	4.73	7.12	231	9.8	379.7	NS	NS	NS	NS
09/19/18	2.39	8.50	298	17.50	0.3	NS	NS	NS	NS
12/10/18	3.46	7.07	-3.2	5.08	410.0	NS	NS	NS	NS
ENFORCEMENT STANDARD = ES – Bold						10	-	-	300
PREVENTIVE ACTION LIMIT = PAL - Italics						2	-	-	60

(ppb) = parts per billion (ppm) = parts per million
 ns = not sampled nm = not measured ORP = Oxidation Reduction Potential
 Note: Elevations are presented in feet mean sea level (msl).

Well MW-8

Date	Dissolved Oxygen (ppm)	pH	ORP	Temp (C)	Specific Conductance	Nitrate + Nitrite (ppm)	Total Sulfate (ppm)	Dissolved Iron (ppm)	Manganese (ppb)
01/29/18	3.40	6.32	-71.7	7.61	412	<0.36	31.4	29.0	1520
04/30/18	0.69	6.52	6	8.7	523	NS	NS	NS	NS
09/19/18	1.94	7.14	54	16.50	0.4	NS	NS	NS	NS
12/10/18	3.43	6.26	-99.2	5.66	455.0	NS	NS	NS	NS
ENFORCEMENT STANDARD = ES – Bold						10	-	-	300
PREVENTIVE ACTION LIMIT = PAL - Italics						2	-	-	60

(ppb) = parts per billion (ppm) = parts per million
 ns = not sampled nm = not measured ORP = Oxidation Reduction Potential
 Note: Elevations are presented in feet mean sea level (msl).

Well PZ-1

Date	Dissolved Oxygen (ppm)	pH	ORP	Temp (C)	Specific Conductance	Nitrate + Nitrite (ppm)	Total Sulfate (ppm)	Dissolved Iron (ppm)	Manganese (ppb)
01/29/18	3.72	5.87	70.5	8.82	773	<0.36	4.53	23.4	1930
04/30/18	1.05	6.36	41	9.9	902	NS	NS	NS	NS
09/19/18	1.36	6.98	-83	16.20	1.0	NS	NS	NS	NS
12/10/18	3.23	6.07	-104.5	7.55	1072.0	NS	NS	NS	NS
ENFORCEMENT STANDARD = ES – Bold						10	-	-	300
PREVENTIVE ACTION LIMIT = PAL - Italics						2	-	-	60

(ppb) = parts per billion (ppm) = parts per million
 ns = not sampled nm = not measured ORP = Oxidation Reduction Potential
 Note: Elevations are presented in feet mean sea level (msl).

**A.7 Other
Luedtke Property
Slug Test Calculations**

MW-1

	ft/s	cm/s	m/yr
K	2.32E-05	7.07E-04	223.00
	sq ft/s	sq cm/s	
T	1.92E-04	1.78E-01	

MW-8

	ft/s	cm/s	m/yr
K	1.49E-05	4.54E-04	143.22
	sq ft/s	sq cm/s	
T	1.13E-04	1.05E-01	

PZ-1

	ft/s	cm/s	m/yr
K	1.22E-05	3.72E-04	117.27
	sq ft/s	sq cm/s	
T	2.60E-04	2.41E-01	

Date	Elv. (High)	Elv. (Low)	Distance (ft)	Hyd Grad (l)
1/29/2018	1441.00	1440.85	69	0.0021739
4/30/2018	1441.80	1441.60	85	0.0023529
9/19/2018	1441.25	1441.15	116	0.0008621
12/10/2018	1441.30	1441.15	135	0.0011111
Average				0.0016250

	K (m/yr)	I	n	Flow Velocity (m/yr)
MW-1	223.00	0.0016250	0.3	1.20792
MW-8	143.22	0.0016250	0.3	0.77578
PZ-1	117.27	0.0016250	0.3	0.63521

A.7 Differential & Vertical Gradient Levels
Luedtke Property BRRS #03-35-554426
Tomahawk, Wisconsin

	PZ-1	MW-1
Ground Surface (feet msl)	1448.13	1448.15
PVC top (feet msl)	1447.59	1447.71
Well Depth (feet)	30.00	15.00
Top of screen (feet msl)	1423.13	1443.15
Bottom of screen (feet msl)	1418.13	1433.15

Groundwater Elevation (feet msl)	PZ-1	MW-1	Differential	PZ-1/MW-1	Vertical Gradient ft/ft
			PZ-1/MW-1		PZ-1/MW-1
01/29/18	1438.98	1440.98	-2.00	17.85	-0.112044818
04/30/18	1439.88	1441.72	-1.84	18.59	-0.098977945
09/19/18	1439.22	1441.20	-1.98	18.07	-0.109573879
12/10/18	1439.15	1441.27	-2.12	18.14	-0.116868798
	Average		-1.99	Average	-0.10936636

Attachment B/Maps and Figures

B.1 Location Maps

B.1.a Location Map

B.1.b Detailed Site Map

B.1.c RR Site Map

B.2 Soil Figures

B.2.a Soil Contamination

B.2.b Residual Soil Contamination

B.3 Groundwater Figures

B.3.a.1 Geologic Cross-Section Figure

B.3.a.2 Geologic Cross-Section Figure (close up)

B.3.a.3 Geologic Cross-Section

B.3.b Groundwater Isoconcentration

B.3.c.1 Groundwater Flow Direction (9/19/18)

B.3.c.2 Groundwater Flow Direction (12/10/18)

B.3.d Monitoring Wells

B.4 Vapor Maps and Other Media

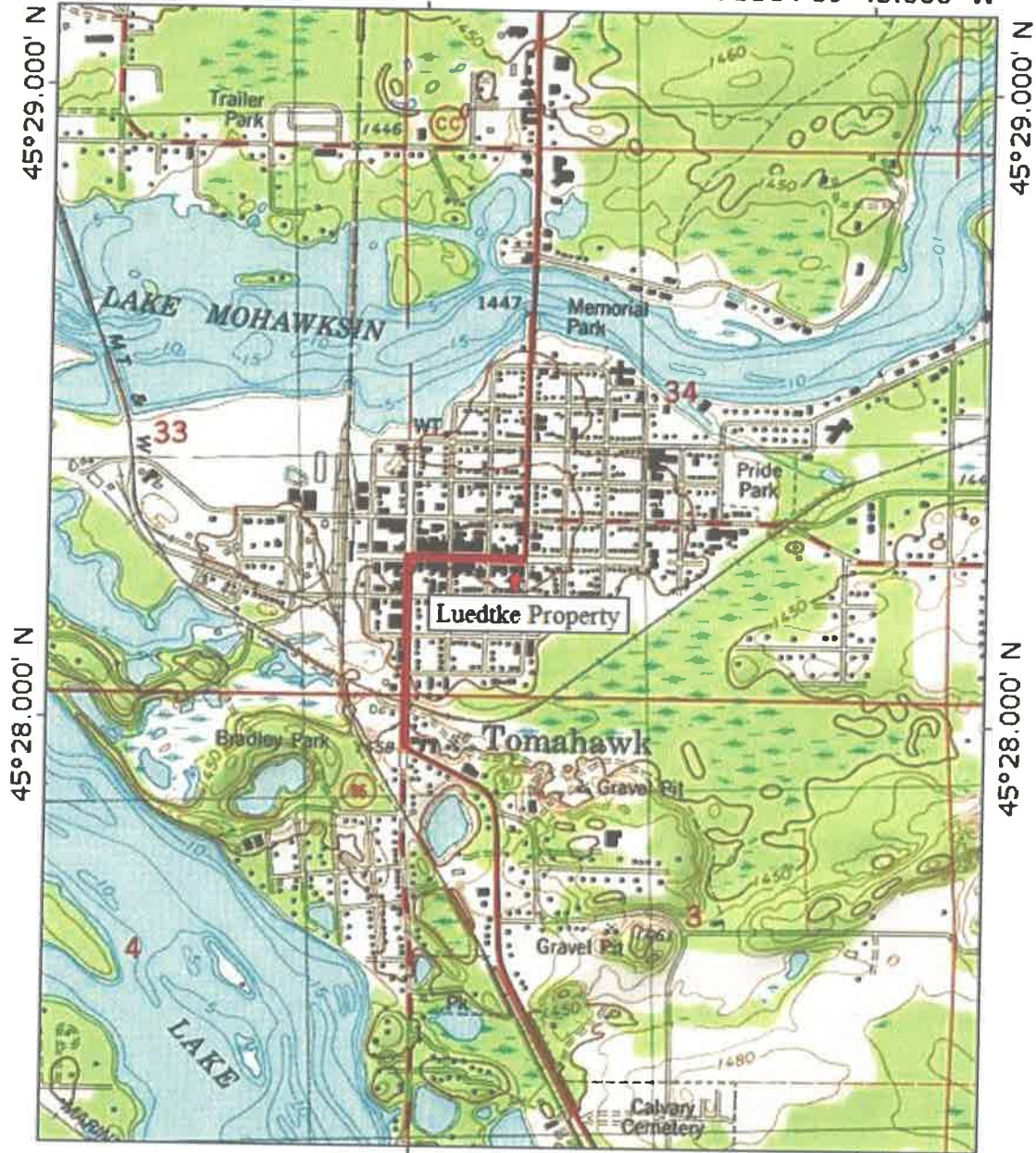
B.4.a Vapor Intrusion Map

B.4.b Other media of concern - No surface waters or sediments were assessed as part of the site investigation.

B.4.c Other – Not applicable.

B.5 Structural Impediment Photos – There were no structural impediments to the completion of the investigation.

TOPO! map printed on 01/19/17 from "Wisconsin.tpo" and "Untitled.tpg"
89°44.000' W WGS84 89°43.000' W



89°44.000' W WGS84 89°43.000' W


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B.1.a LOCATION MAP
CONTOUR INTERVAL 10 FEET
LUEDTKE PROPERTY – TOMAHAWK, WI
SEAMLESS USGS TOPOGRAPHIC MAPS ON CD-ROM

B.1.b
DETAILED SITE MAP
LUEDTKE PROPERTY

METCO
 709 Gilbert St. Suite 1
 La Crosse, WI 54601
 Tel: (608) 781-8279
 Fax: (608) 781-8893
 Excellence through expertise

TOMAHAWK, WISCONSIN
 DRAWN BY: ED
 DATE: 04/8/2017



NOTE: INFORMATION BASED ON AVAILABLE DATA ACTUAL CONDITIONS MAY DIFFER

⊕ - FORMER MONITORING WELL LOCATION - LES STANDARD

⊙ - MONITORING WELL LOCATION - METCO

✕ - SOIL BORING LOCATION

▤ - STORM DRAIN

⊙ - FIRE HYDRANT

● - LIGHT POLE

--- - PROPERTY BOUNDARY

--- - SANITARY SEWER LINE

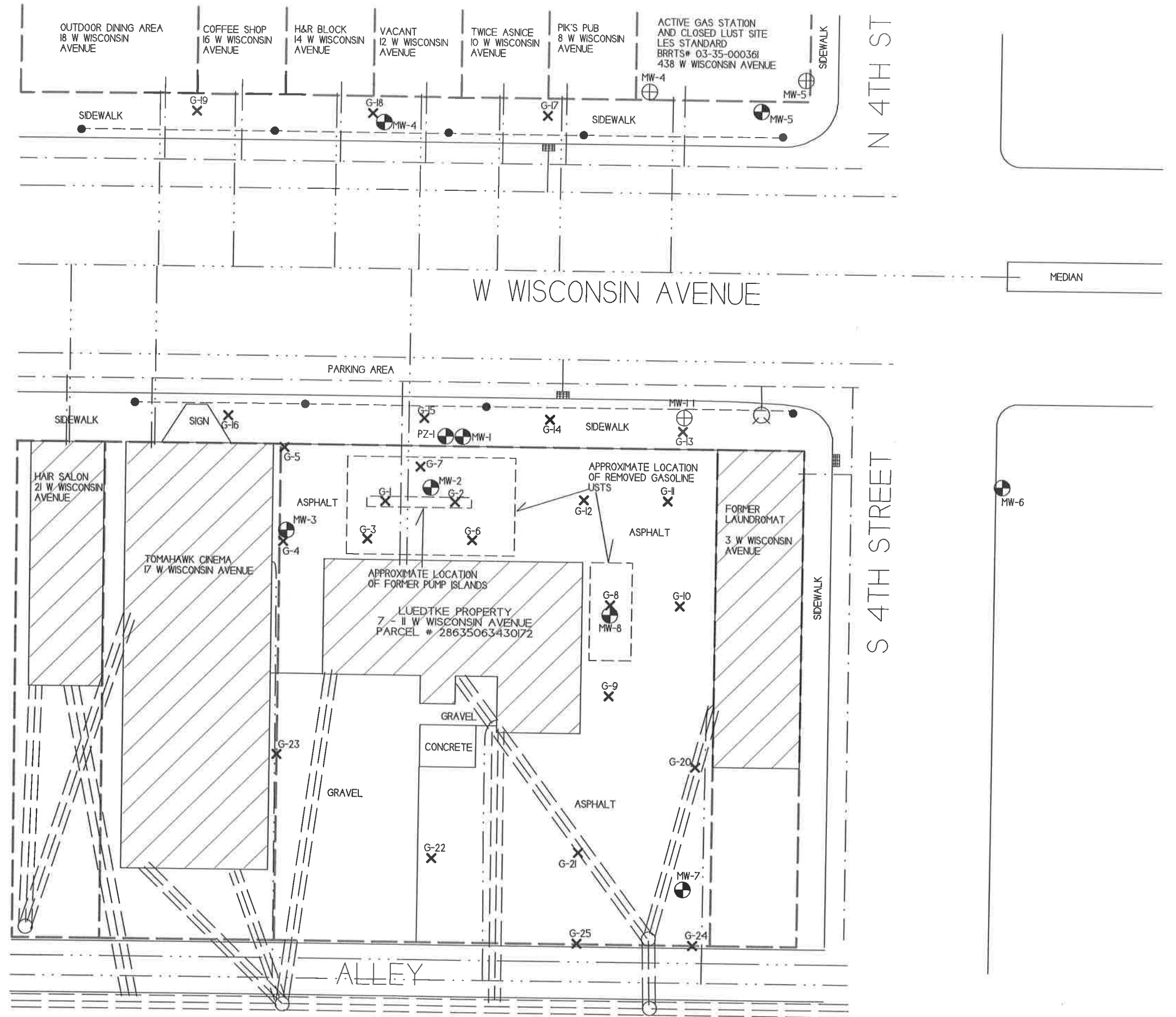
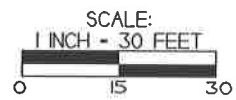
--- - STORM SEWER LINE

--- - WATER LINE

--- - GAS LINE

--- - BURIED ELECTRIC LINE

=== - OVERHEAD ELECTRIC





B.1.c. RR Site Map



Legend

- Open Site
- Closed Site
- Continuing Obligations Apply
- Facility-wide Site

0.5 0 Distance / 2 0.5 Miles

1: 15,840



NAD_1983_HARN_Wisconsin_TM

DISCLAIMER: The information shown on these maps has been obtained from various sources, and are of varying age, reliability and resolution. These maps are not intended to be used for navigation, nor are these maps an authoritative source of information about legal land ownership or public access. No warranty, expressed or implied, is made regarding accuracy, applicability for a particular use, completeness, or legality of the information depicted on this map. For more information, see the DNR Legal Notices web page: <http://dnr.wi.gov/legal/>


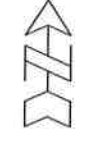
Note: Not all sites are mapped.

Notes

B.2.a
SOIL CONTAMINATION
LUEDTKE PROPERTY

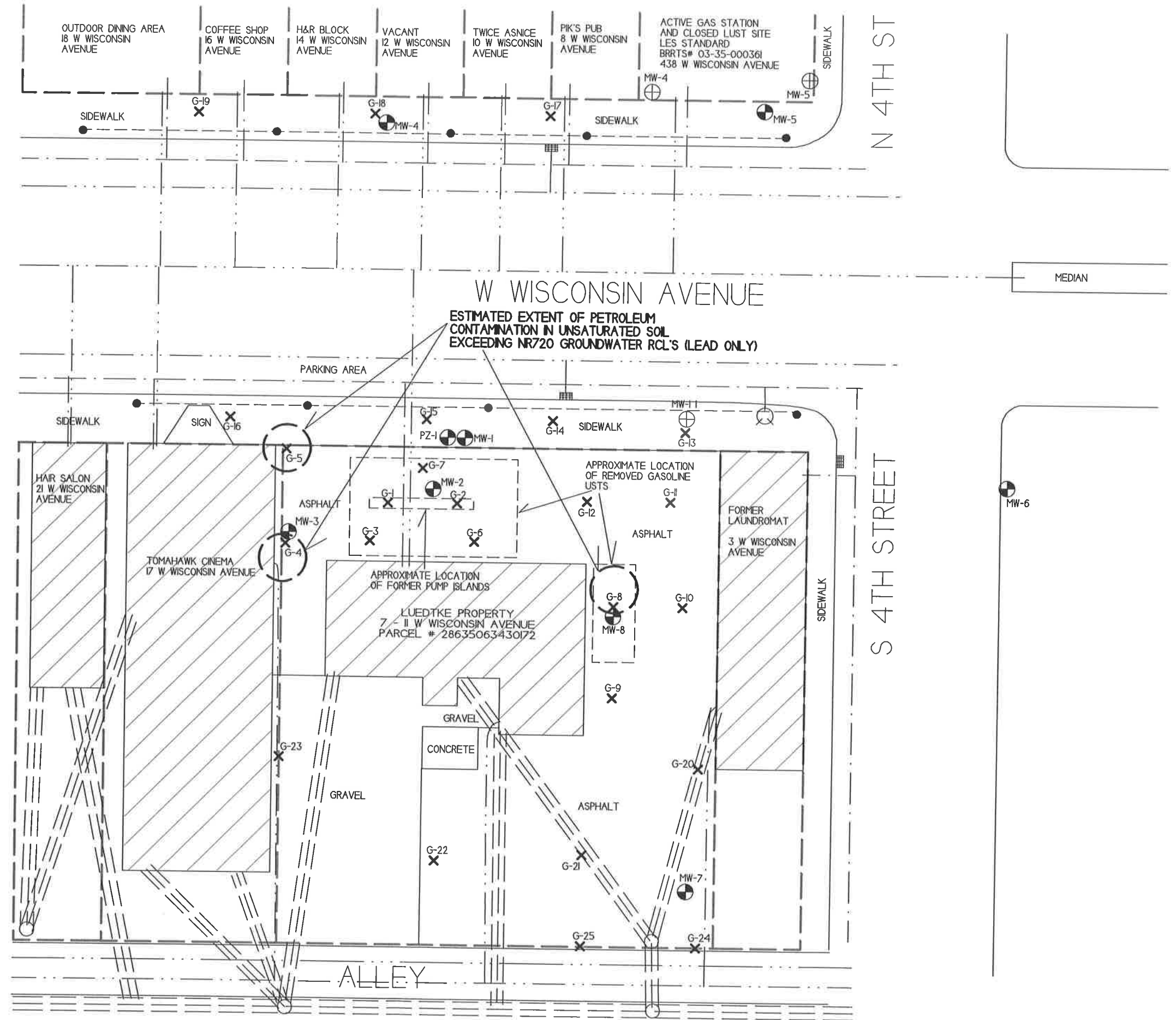
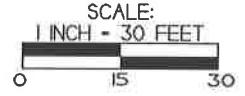
709 Gillette St. Suite 3
La Crosse, WI 54603
Tel: (608) 783-6873
Fax: (608) 781-8853



TOMAHAWK,
WISCONSIN
DRAWN BY: ED
DATE: 04/18/2007

NOTE: INFORMATION BASED ON AVAILABLE DATA ACTUAL CONDITIONS MAY DIFFER

- ⊕ - FORMER MONITORING WELL LOCATION - LES STANDARD
- ⊙ - MONITORING WELL LOCATION - METCO
- ✕ - SOIL BORING LOCATION
- ▤ - STORM DRAIN
- ⊙ - FIRE HYDRANT
- - LIGHT POLE
- - PROPERTY BOUNDARY
- - - - - SANITARY SEWER LINE
- - - - - STORM SEWER LINE
- - - - - WATER LINE
- - - - - GAS LINE
- - - - - BURIED ELECTRIC LINE
- ≡≡≡≡≡≡ - OVERHEAD ELECTRIC



B.2.b RESIDUAL SOIL CONTAMINATION LUEDTKE PROPERTY		
	TOMAHAWK, WISCONSIN <small>DRAWN BY: ED DATE: 06/18/2007</small>	

NOTE: INFORMATION BASED ON AVAILABLE DATA ACTUAL CONDITIONS MAY DIFFER

⊕ - FORMER MONITORING WELL LOCATION - LES STANDARD

⊙ - MONITORING WELL LOCATION - METCO

✕ - SOIL BORING LOCATION

▤ - STORM DRAIN

⊙ - FIRE HYDRANT

● - LIGHT POLE

--- - PROPERTY BOUNDARY

--- - SANITARY SEWER LINE

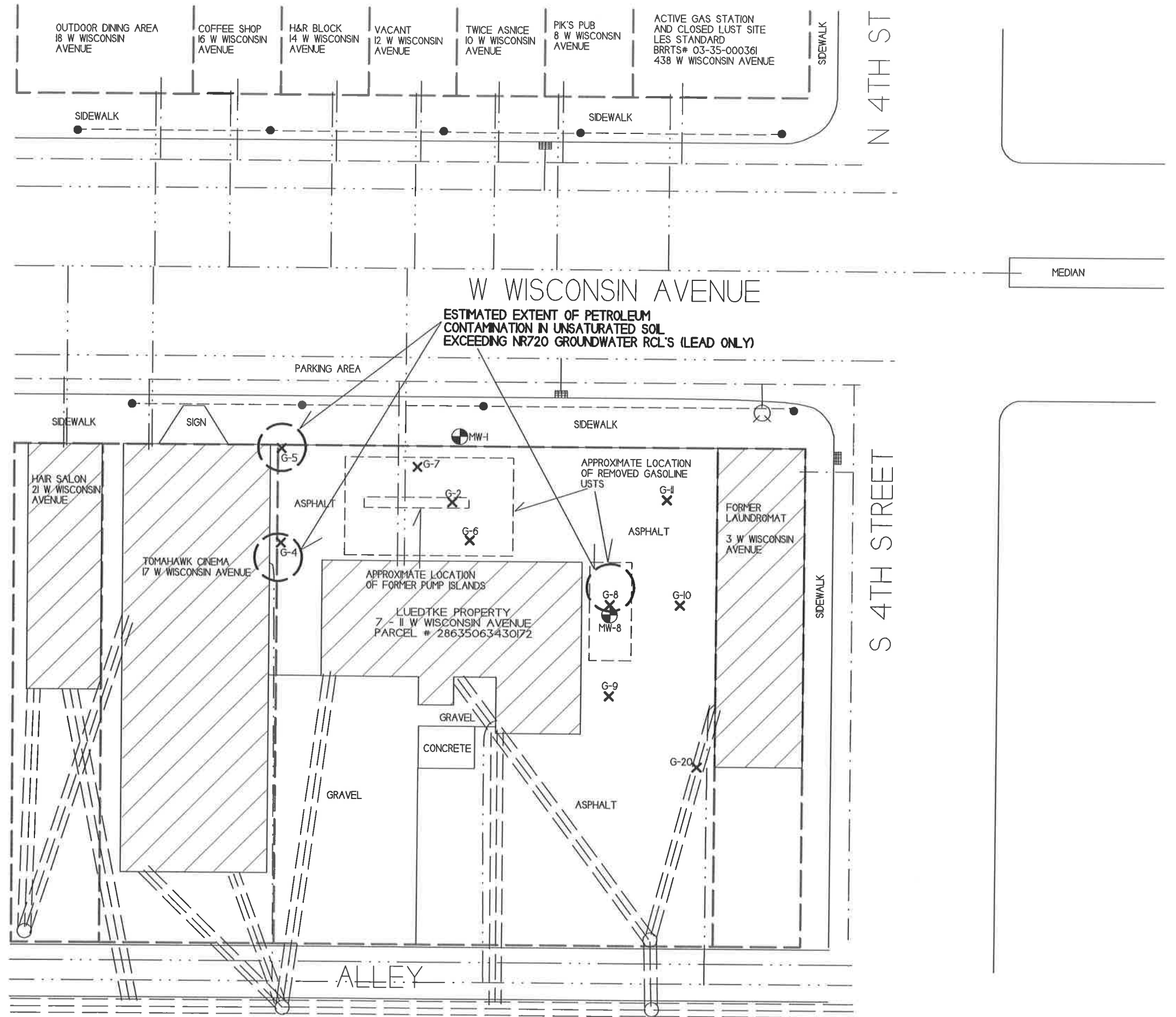
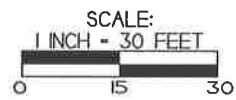
--- - STORM SEWER LINE

--- - WATER LINE

--- - GAS LINE

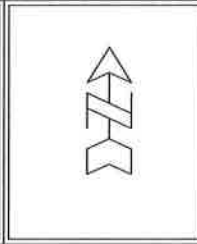
--- - BURIED ELECTRIC LINE

=== - OVERHEAD ELECTRIC



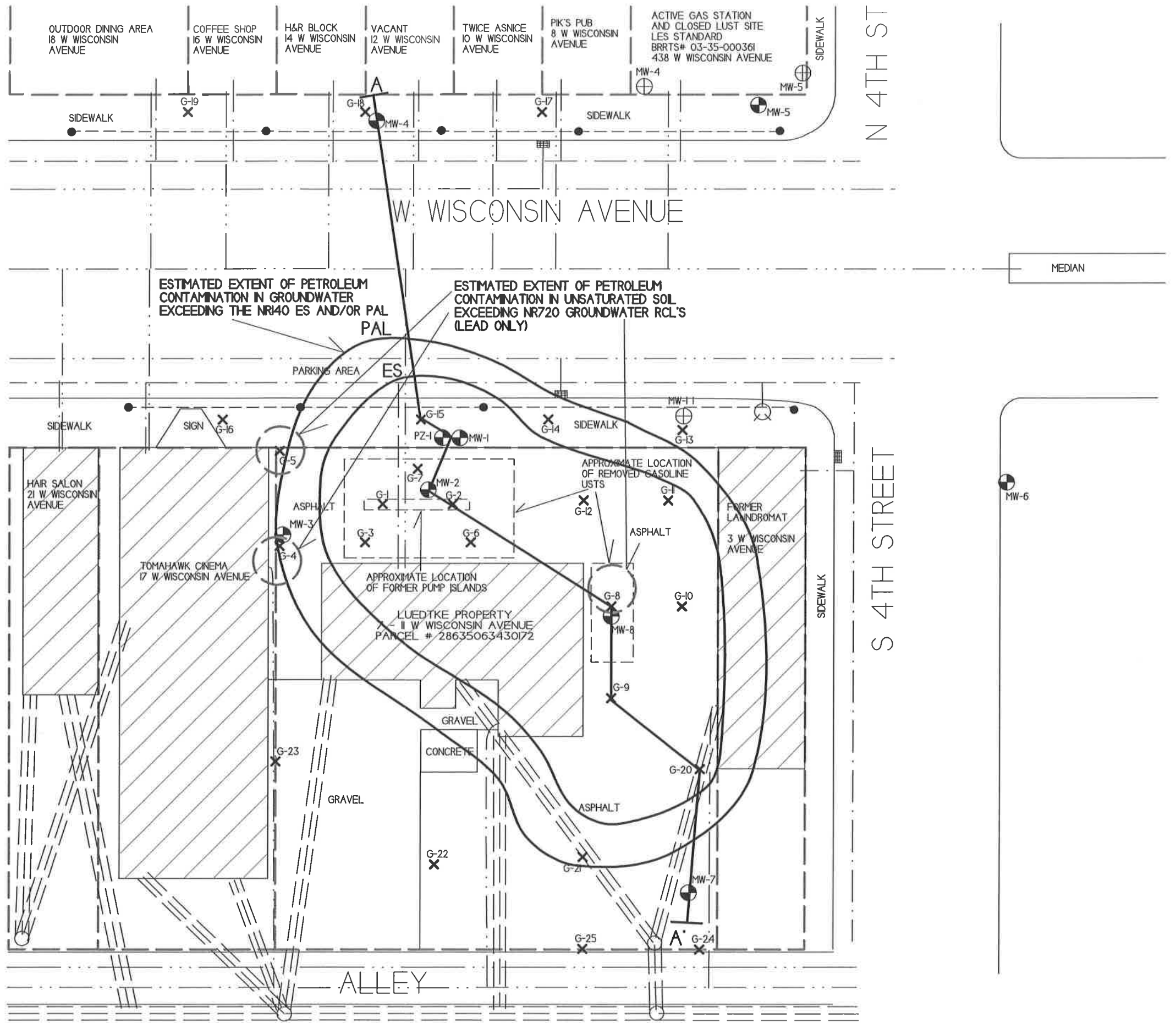
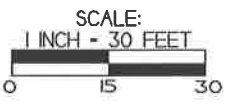
B.3.a.1 GEOLOGIC
CROSS SECTION FIGURE
LUEDTKE PROPERTY

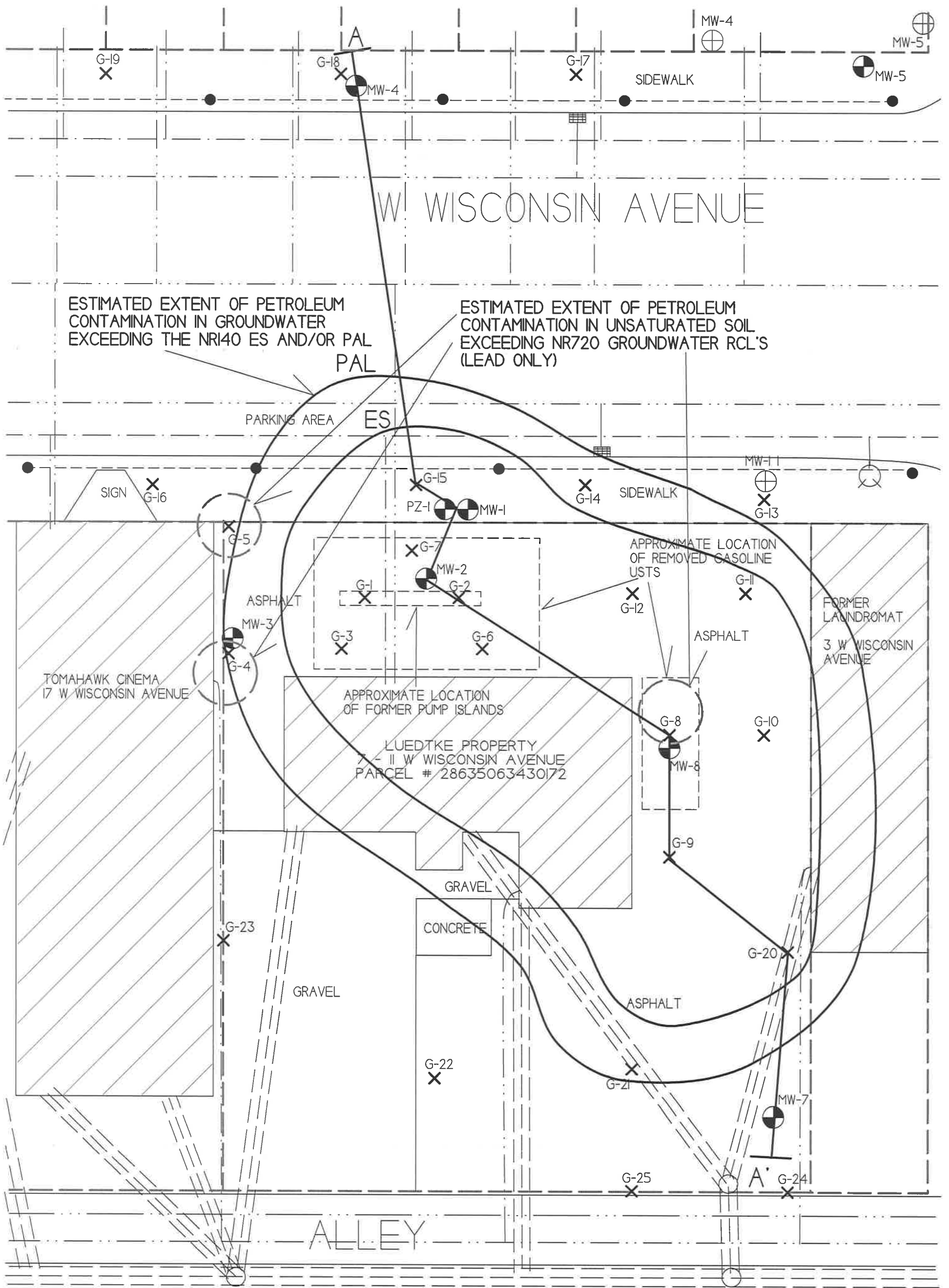
	709 Gillette St. Suite 3 Le Centre, WI 54603 Tel: (920) 751-8575 Fax: (920) 751-8823	TOMAHAWK, WISCONSIN DRAWN BY: ED DATE: 06/8/2017
	709 Gillette St. Suite 3 Le Centre, WI 54603 Tel: (920) 751-8575 Fax: (920) 751-8823	



NOTE: INFORMATION BASED ON AVAILABLE DATA ACTUAL CONDITIONS MAY DIFFER

- ⊕ - FORMER MONITORING WELL LOCATION - LES STANDARD
- ⊙ - MONITORING WELL LOCATION - METCO
- ✕ - SOIL BORING LOCATION
- ▤ - STORM DRAIN
- ⊙ - FIRE HYDRANT
- - LIGHT POLE
- - PROPERTY BOUNDARY
- - - - - SANITARY SEWER LINE
- - - - - STORM SEWER LINE
- - - - - WATER LINE
- - - - - GAS LINE
- - - - - BURIED ELECTRIC LINE
- ≡≡≡≡≡≡ - OVERHEAD ELECTRIC





ESTIMATED EXTENT OF PETROLEUM CONTAMINATION IN GROUNDWATER EXCEEDING THE NR140 ES AND/OR PAL PAL

ESTIMATED EXTENT OF PETROLEUM CONTAMINATION IN UNSATURATED SOIL EXCEEDING NR720 GROUNDWATER RCL'S (LEAD ONLY)

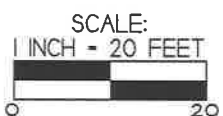
B.3.a.2 GEOLOGIC CROSS SECTION FIGURE (CLOSE UP)
 LUEDTKE PROPERTY

METCO
 209 Grindel St., Suite 2
 La Crosse, WI 54601
 Tel: (608) 781-6879
 Fax: (608) 781-6883

TOMAHAWK WISCONSIN
 DRAWN BY: ED
 DATE: 02/18/20

NOTE: INFORMATION BASED ON AVAILABLE DATA ACTUAL CONDITIONS MAY DIFFER

- ⊕ = FORMER MONITORING WELL LOCATION - LES STANDARD
- ⊗ = MONITORING WELL LOCATION - METCO
- ✕ = SOIL BORING LOCATION
- ▒ = STORM DRAIN
- ⊙ = FIRE HYDRANT
- = LIGHT POLE
- — — — — = PROPERTY BOUNDARY
- — — — — = SANITARY SEWER LINE
- — — — — = STORM SEWER LINE
- — — — — = WATER LINE
- — — — — = GAS LINE
- — — — — = BURIED ELECTRIC LINE
- — — — — = OVERHEAD ELECTRIC



B.3.a.3 GEOLOGIC CROSS SECTION
LUEDTKE PROPERTY



NOTE: SOIL AND GROUNDWATER SAMPLE DATA IS BASED ON LABORATORY RESULTS FROM SAMPLES COLLECTED DURING THE FOLLOWING EVENTS:
 - GEOPROBE PROJECT (5/8-9/17)
 - DRILLING PROJECT (11/13-14/17)
 - ROUND 4 GROUNDWATER SAMPLING (12/10/18)

NOTE: SOIL RESULTS SHOW DETECTS AND EXCEEDANCES THAT HAVE BEEN DOCUMENTED ON THE MAP. SEE DATA TABLES AND/OR LABORATORY REPORTS FOR ALL RESULTS

- - MONITORING WELL LOCATION
- - GEOPROBE BORING LOCATION
- ✕ - SOIL SAMPLING LOCATION
- ▼ - WATERTABLE

NOTE: WATER TABLE IS BASED ON ALL TIME LOW MEASUREMENTS.

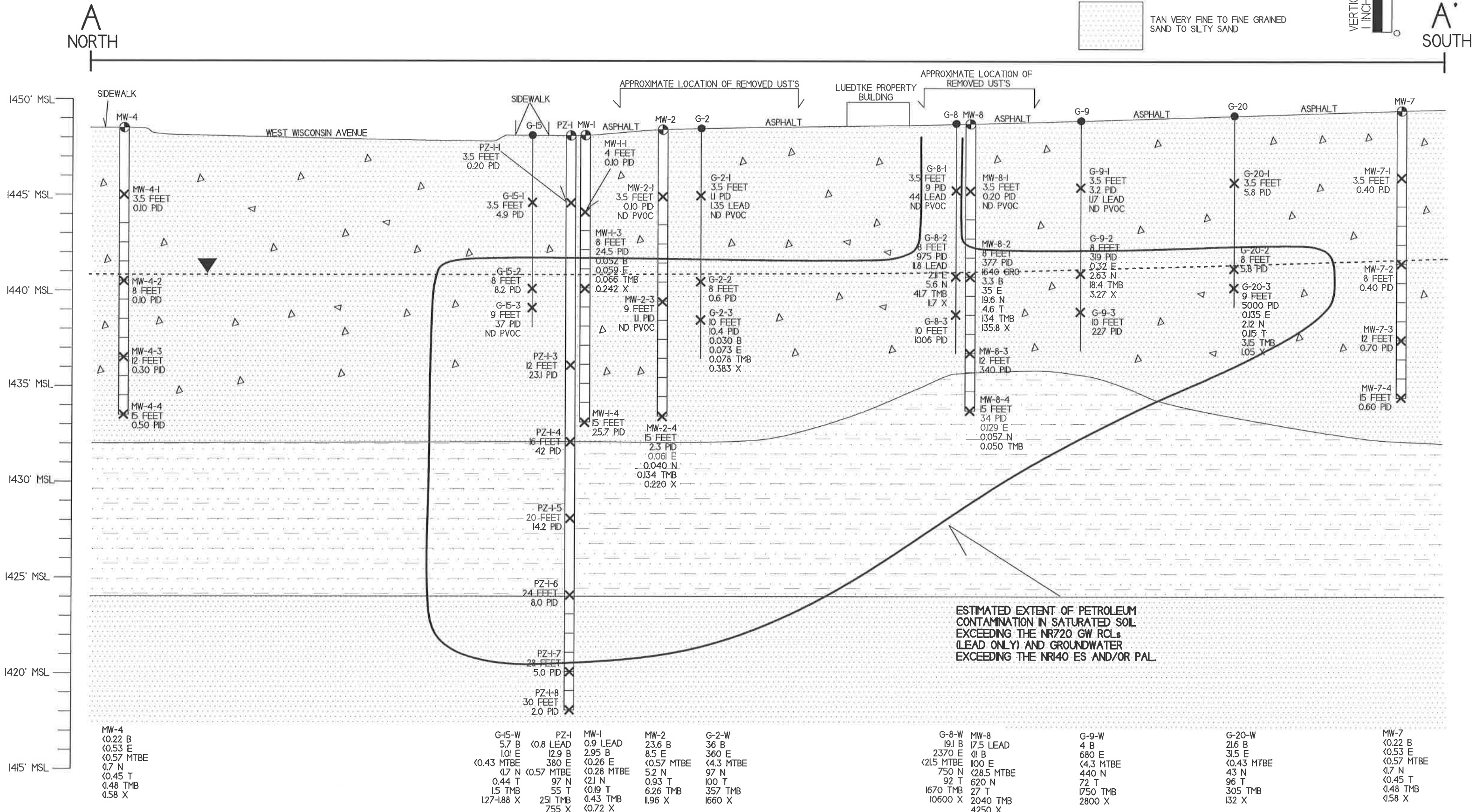
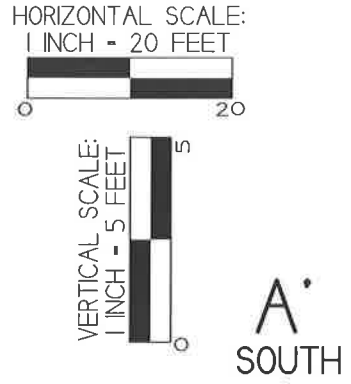
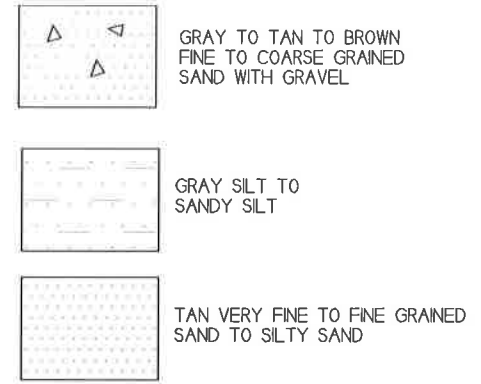
INFORMATION BASED ON AVAILABLE DATA. ACTUAL CONDITIONS MAY DIFFER

SOIL SAMPLE RESULTS ARE PRESENTED IN PARTS PER MILLION (PPM).

GROUNDWATER SAMPLE RESULTS ARE PRESENTED IN PARTS PER BILLION (PPB).

GROUNDWATER FLOW IS TOWARD THE WEST TO NORTHWEST.

- ND - NO DETECT
- PID - PHOTO IONIZATION DETECTOR
- GRO - GASOLINE RANGE ORGANICS
- PVOC - PETROLEUM VOLATILE ORGANIC COMPOUNDS
- B - BENZENE
- E - ETHYLBENZENE
- MTBE - METHYL-TERT-BUTYL-ETHER
- N - NAPHTHALENE
- T - TOLUENE
- TMB - TRIMETHYLBENZENE
- X - XYLENE



ESTIMATED EXTENT OF PETROLEUM CONTAMINATION IN SATURATED SOIL EXCEEDING THE NR720 GW RCLs (LEAD ONLY) AND GROUNDWATER EXCEEDING THE NR140 ES AND/OR PAL.

MW-4
 <0.22 B
 <0.53 E
 <0.57 MTBE
 <1.7 N
 <0.45 T
 <1.48 TMB
 <1.58 X

G-15-W 5.7 B
 <0.43 MTBE
 <1.7 N
 <0.44 T
 1.5 TMB
 1.27-1.88 X

PZ-1 <0.8 LEAD
 12.9 B
 380 E
 <0.57 MTBE
 97 N
 55 T
 251 TMB
 755 X

MW-1 0.9 LEAD
 2.95 B
 <0.26 E
 <0.28 MTBE
 <2.1 N
 <0.19 T
 <1.43 TMB
 <0.72 X

MW-2 23.6 B
 8.5 E
 <0.57 MTBE
 5.2 N
 0.93 T
 6.26 TMB
 11.96 X

G-2-W 36 B
 360 E
 <4.3 MTBE
 97 N
 100 T
 357 TMB
 1660 X

G-8-W 19.1 B
 2370 E
 <21.5 MTBE
 750 N
 92 T
 1670 TMB
 10600 X

MW-8 17.5 LEAD
 <11 B
 <100 E
 <28.5 MTBE
 620 N
 27 T
 2040 TMB
 4250 X

G-9-W 4 B
 680 E
 <4.3 MTBE
 440 N
 72 T
 1750 TMB
 2800 X



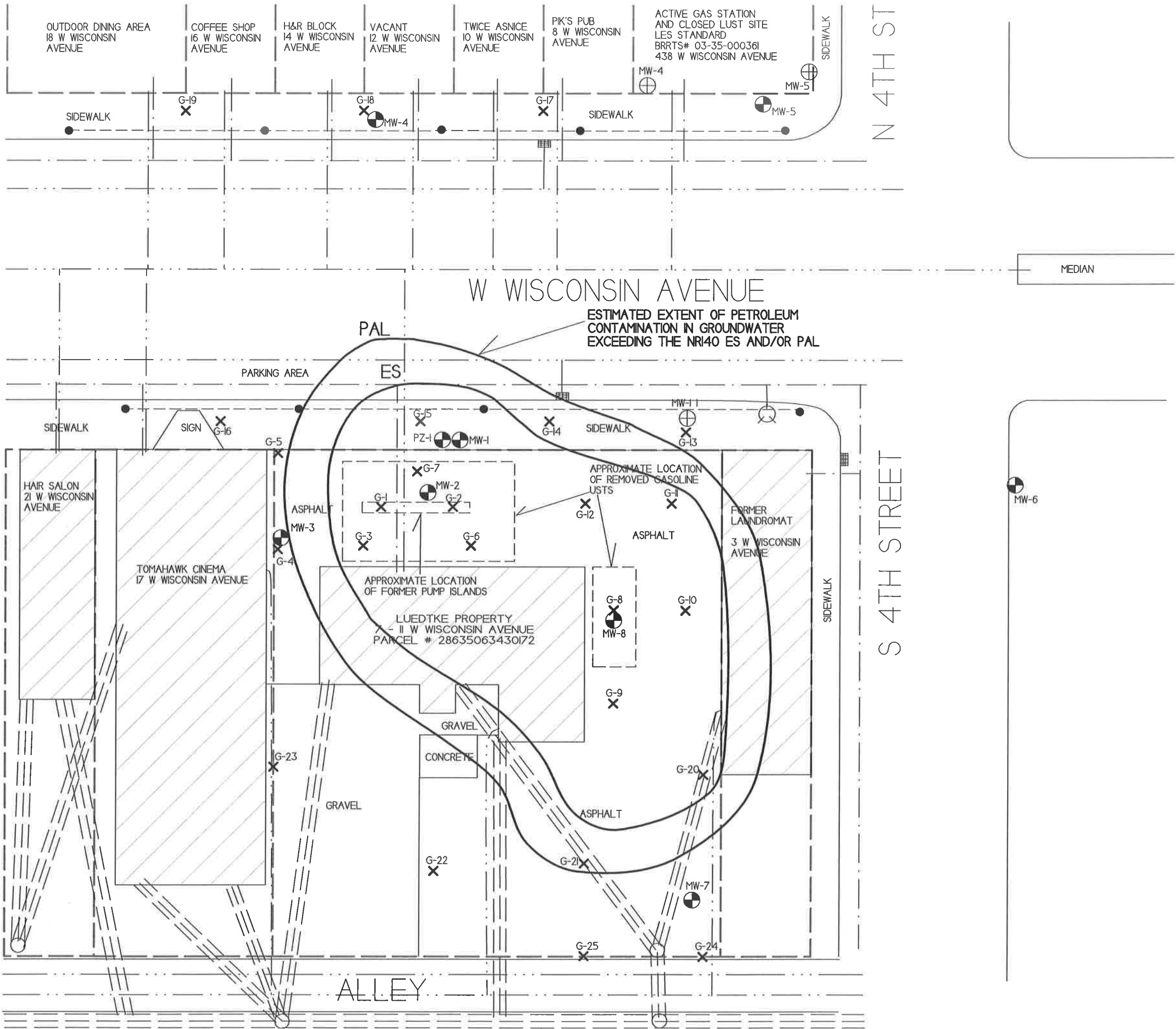
G-20-W 21.6 B
 31.5 E
 <0.43 MTBE
 43 N
 96 T
 305 TMB
 132 X

MW-7 <0.22 B
 <0.53 E
 <0.57 MTBE
 <1.7 N
 <0.45 T
 <1.48 TMB
 <1.58 X

B.3.b GROUNDWATER ISOCONCENTRATION (12/10/18)
 LUEDTKE PROPERTY

709 Gillette St. Suite 3
 La Crosse, WI 54603
 Tel: (608) 781-8879
 Fax: (608) 781-8893

TOMAHAWK, WISCONSIN
 DRAWN BY: ED
 DATE: 01/18/2017

NOTE: INFORMATION BASED ON AVAILABLE DATA ACTUAL CONDITIONS MAY DIFFER

⊕ - FORMER MONITORING WELL LOCATION - LES STANDARD

⊗ - MONITORING WELL LOCATION - METCO

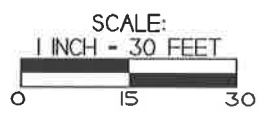
✕ - SOIL BORING LOCATION

▤ - STORM DRAIN

⊙ - FIRE HYDRANT

● - LIGHT POLE

- - - - - PROPERTY BOUNDARY
- - - - - SANITARY SEWER LINE
- - - - - STORM SEWER LINE
- - - - - WATER LINE
- - - - - GAS LINE
- - - - - BURIED ELECTRIC LINE
- ==== OVERHEAD ELECTRIC



B.3.c.2 GROUNDWATER FLOW DIRECTION (12/10/18)
 LUEDTKE PROPERTY

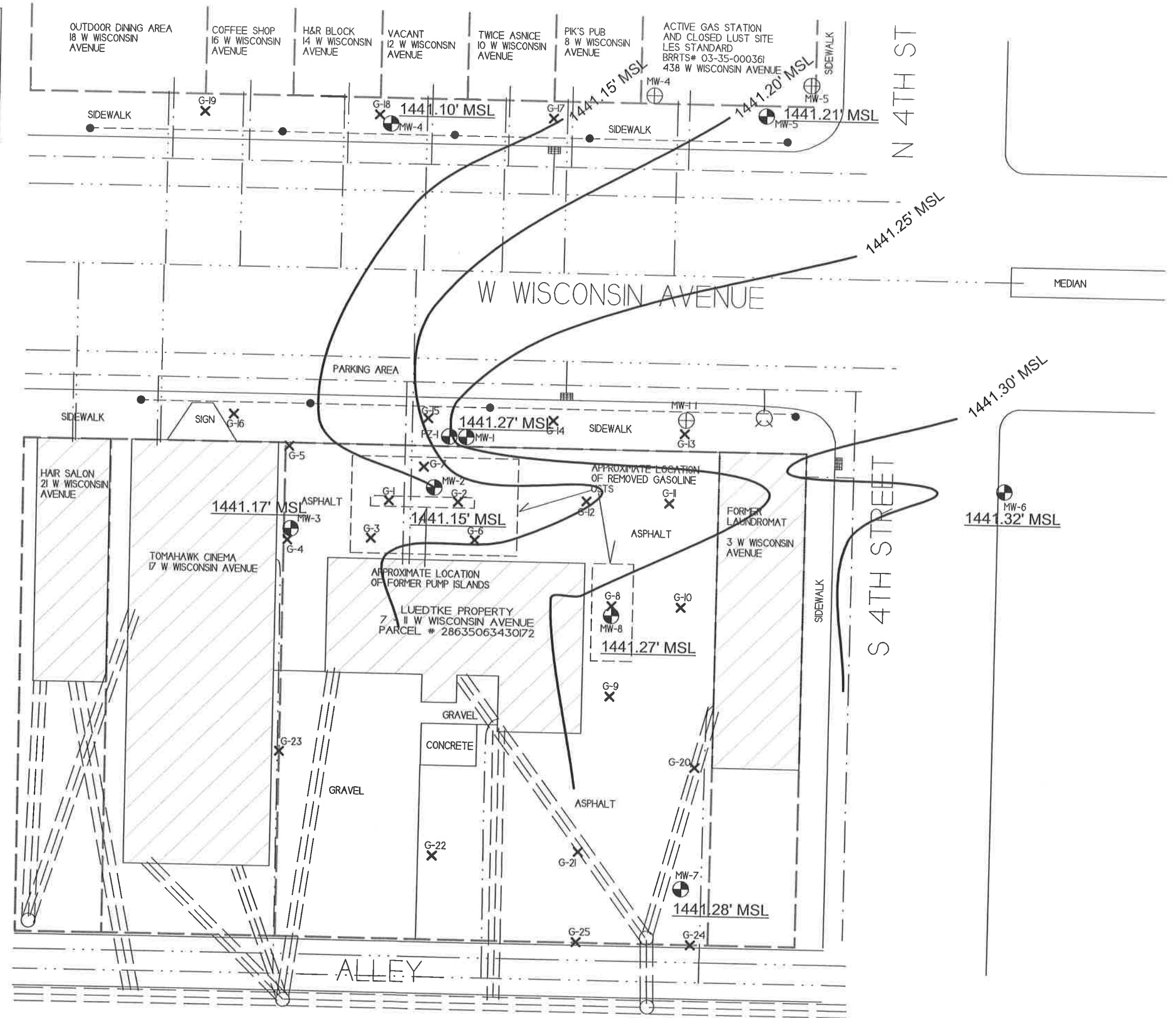
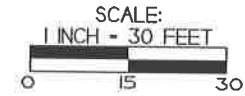
METCO
 709 Gillette St. Suite 3
 La Crosse, WI 54603
 Tel: (608) 781-8870
 Fax: (608) 781-8873

TOMAHAWK, WISCONSIN
 DRAWN BY: ED
 DATE: 01/16/2017

NOTE: INFORMATION BASED ON AVAILABLE DATA ACTUAL CONDITIONS MAY DIFFER

- ⊕ - FORMER MONITORING WELL LOCATION - LES STANDARD
- ⊙ - MONITORING WELL LOCATION - METCO
- ✕ - SOIL BORING LOCATION
- ▤ - STORM DRAIN
- ⊙ - FIRE HYDRANT
- - LIGHT POLE

- - PROPERTY BOUNDARY
- - - - - SANITARY SEWER LINE
- - - - - STORM SEWER LINE
- - - - - WATER LINE
- - - - - GAS LINE
- - - - - BURIED ELECTRIC LINE
- ≡≡≡≡≡≡ - OVERHEAD ELECTRIC



B.3.d MONITORING WELLS LUEDTKE PROPERTY		
	709 Gillette St., Suite 3 La Crosse, WI 54603 Tel: (608) 781-5875 Fax: (608) 781-8923 DATE: 04/6/2007	
TOMAHAWK, WISCONSIN DRAWN BY: ED DATE: 04/6/2007		

NOTE: INFORMATION BASED ON AVAILABLE DATA ACTUAL CONDITIONS MAY DIFFER

⊕ - FORMER MONITORING WELL LOCATION - LES STANDARD (ABANDONED)

⊙ - MONITORING WELL LOCATION - METCO (PROPOSED TO BE ABANDONED)

▤ - STORM DRAIN

⊙ - FIRE HYDRANT

● - LIGHT POLE

--- - PROPERTY BOUNDARY

--- - SANITARY SEWER LINE

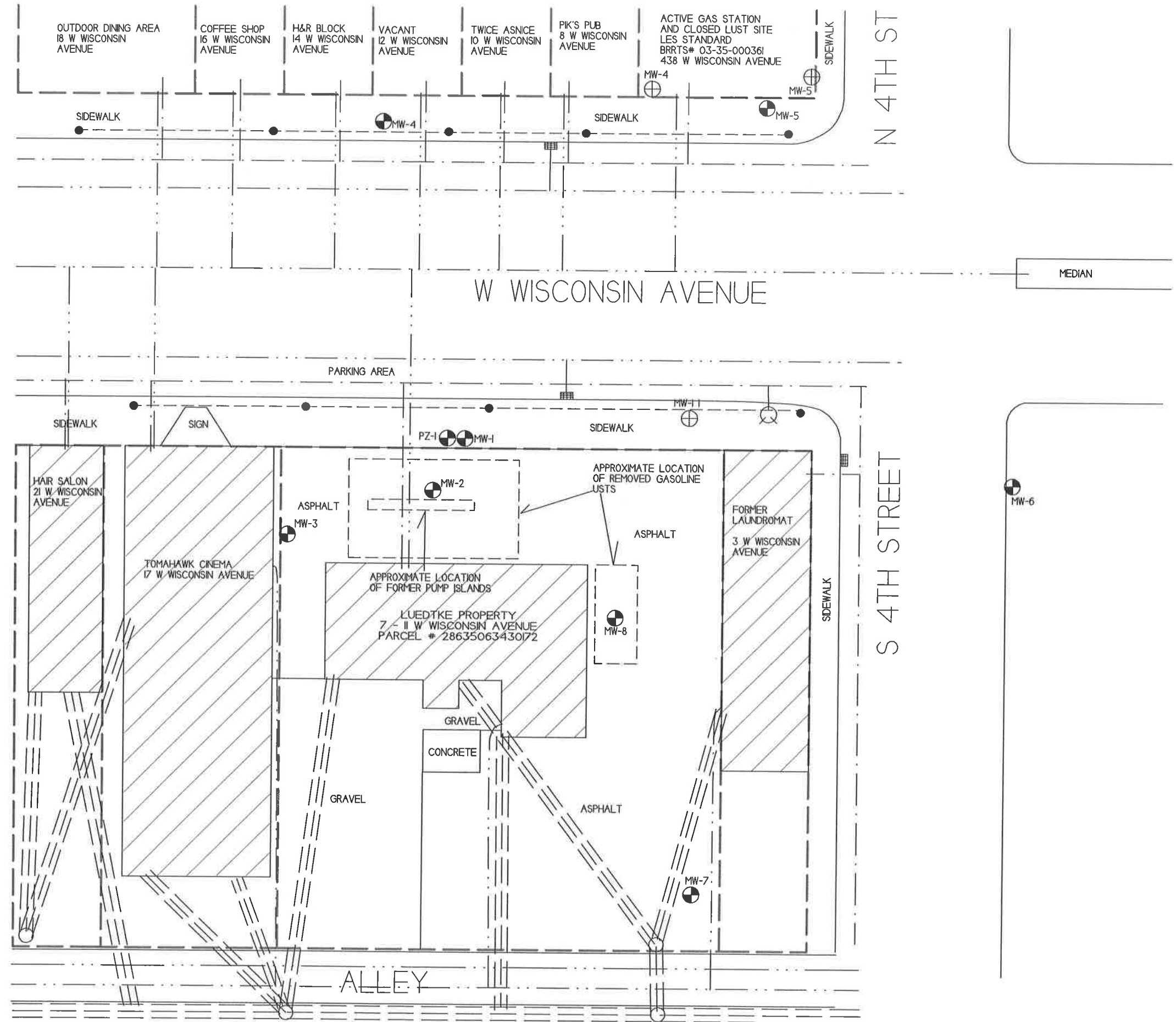
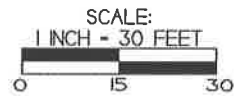
--- - STORM SEWER LINE

--- - WATER LINE

--- - GAS LINE

--- - BURIED ELECTRIC LINE

=== - OVERHEAD ELECTRIC



Attachment C/Documentation of Remedial Action

C.1 Site Investigation documentation – All other site investigation activities are documented in the following reports:

- Site Investigation Report – January 23, 2018
- Letter Report – January 29, 2019

C.2 Investigative waste

C.3 Provide a description of the methodology used along with all supporting documentation if the Residual Contaminant Levels are different than those contained in the Department's RCL Spreadsheet available at: <http://dnr.wi.gov/topic/brownfields.Professionals.html> - Residual Contaminant Levels (RCLs) were established in accordance with NR 720.10 and NR 720.12. Soil RCL for the protection of the groundwater pathway and for non-industrial direct contact were taken from the RR programs RCL spreadsheet.

C.4 Construction documentation – No remedial systems were installed.

C.5 Decommissioning of Remedial Systems – No remedial systems were installed.

C.6 Other – Not Applicable

Attachment D/Maintenance Plan(s)

- D.1 Descriptions of maintenance action(s) required for maximizing effectiveness of the engineered control, vapor mitigation system, feature or other action for which maintenance is required via cap maintenance plan. – A cap maintenance plan is not being implemented at this time.
- D.2 Location map(s) – A cap maintenance plan is not being implemented at this time.
- D.3 Photographs – A cap maintenance plan is not being implemented at this time.
- D.4 Inspection log – A cap maintenance plan is not being implemented at this time.

Attachment E/Monitoring Well Information

All wells have been located and will be properly abandoned upon WDNR granting closure to the site.

Attachment F/Source Legal Documents

F.1 Deed

F.2 Certified Survey Map

F.3 Verification of Zoning

F.4 Signed Statement

STATE BAR OF WISCONSIN FORM 1 - 1998
WARRANTY DEED

447937

F.1 DEED

Document Number

This Deed, made between Mary J. Czaja and Bruce Czaja, her husband,

Grantor, Todd Luedtke and JACLYN V. LUEDTKE,
and HUSBAND AND WIFE AS SURVIVORSHIP MARITAL PROPERTY

Grantee,
Grantor, for a valuable consideration, conveys to Grantee the following described real estate in Lincoln County, State of Wisconsin (the "Property"):

Lots Seven (7), Eight (8), Nine (9), Ten (10) and Eleven (11), Block Seventeen (17) of the Original Plat of Tomahawk, Lincoln County, Wisconsin.

RECEIVED
LINCOLN COUNTY, WIS

2005 JAN 10 AM 11 15

[Signature]
REGISTER OF DEEDS

Recording Area
Name and Return Address

1758-33378
#112024.TSB.Ch.# 37921
36.0002.000.304.0000

Parcel Identification Number (PIN)
This is not homestead property.
(~~is~~) (is not)

TRANSFER
\$ 390.00
FEE

Together with all appurtenant rights, title and interests.

Grantor warrants that the title to the Property is good, Indefeasible In fee simple and free and clear of encumbrances except easements of record.

Dated this 20th day of December, 2005

Mary J. Czaja (SEAL)
Bruce Czaja (SEAL)
* Mary J. Czaja
* Bruce Czaja

____ (SEAL)
____ (SEAL)

AUTHENTICATION

ACKNOWLEDGMENT

Signature(s) Mary J. Czaja and Bruce Czaja
Czaja

authenticated this _____ day of _____, 2005

State of Wisconsin,
Lincoln County } ss.
Personally came before me this 20th day of December, 2005, the above named Mary J. Czaja and Bruce Czaja

* James T. Runyon
TITLE: MEMBER STATE BAR OF WISCONSIN
(If not, _____
authorized by §706.06, Wis. Stats.)

_____ to
me known to be the person(s) who executed the foregoing
instrument and acknowledge the same.
Dana Lynn Zehner
* Dana Lynn Zehner
Notary Public, State of Wisconsin
My commission is permanent (if not, state expiration date:
08/12/07)

THIS INSTRUMENT WAS DRAFTED BY
James T. Runyon of
RUNYON LAW OFFICES, LLC
(Signatures may be authenticated or acknowledged. Both are not
necessary.) per description provided.

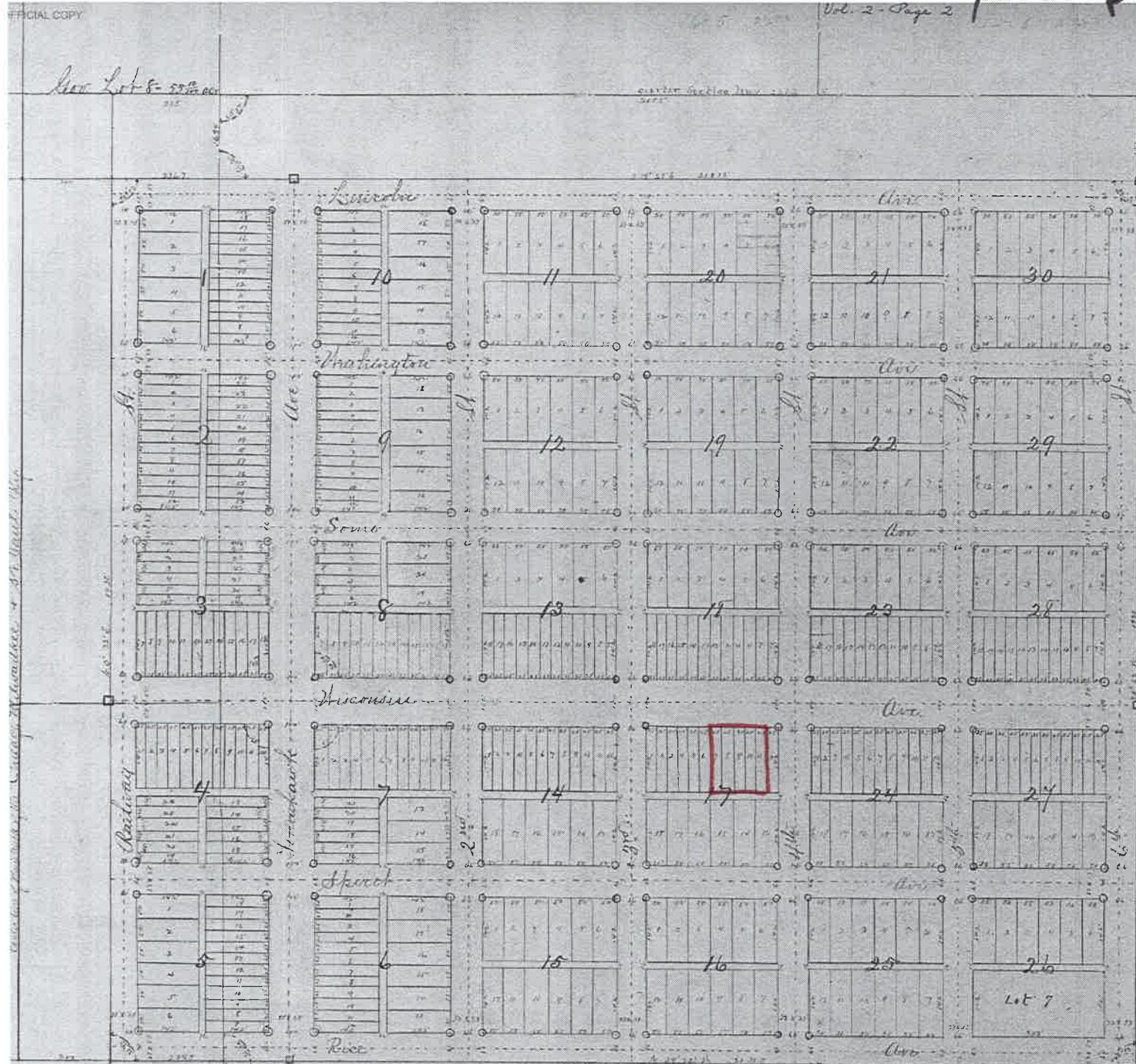
* Names of persons signing in any capacity must be typed or printed below their signature.

F.2 Certified Survey Map.

Vol. 2 - Page 2



2



For final resolution discontinuing part of Lincoln Ave. between east line of alley in Blk 1, sec. 16 and the W line of N. Tomahawk Ave. see Vol. 531-R-569 John Callahan Register of Deeds

For Discontinue Sec. 3211. filed 2/21/96, discontinuing part of N-S Alley in Blk 3, Original Plat of City of Iowa which is approximately 5 feet E + W + 16 feet N + S on the Eastern side of the alley. John Callahan, Register of Deeds.

For Order Discontinuing a small area on East side of the North - South alley in Blk 3, see Vol. 574-R-410, John Callahan, Register of Deeds.

Plat of Tomahawk Lincoln Co. Iowa Scale 100 feet = one inch

For Order discontinuing Alley entire Blk 3 see Vol. 481-R-124 John Callahan, Register of Deeds

For Resolutions to vacate a part of the alley in Block 3, see Vol. 213-R-1674 Warren Washburn, Reg. of Deeds

For Resolution to vacate a part of the alley in Block 3 see Vol. 574-R-37, Nathan Strickland, Register of Deeds

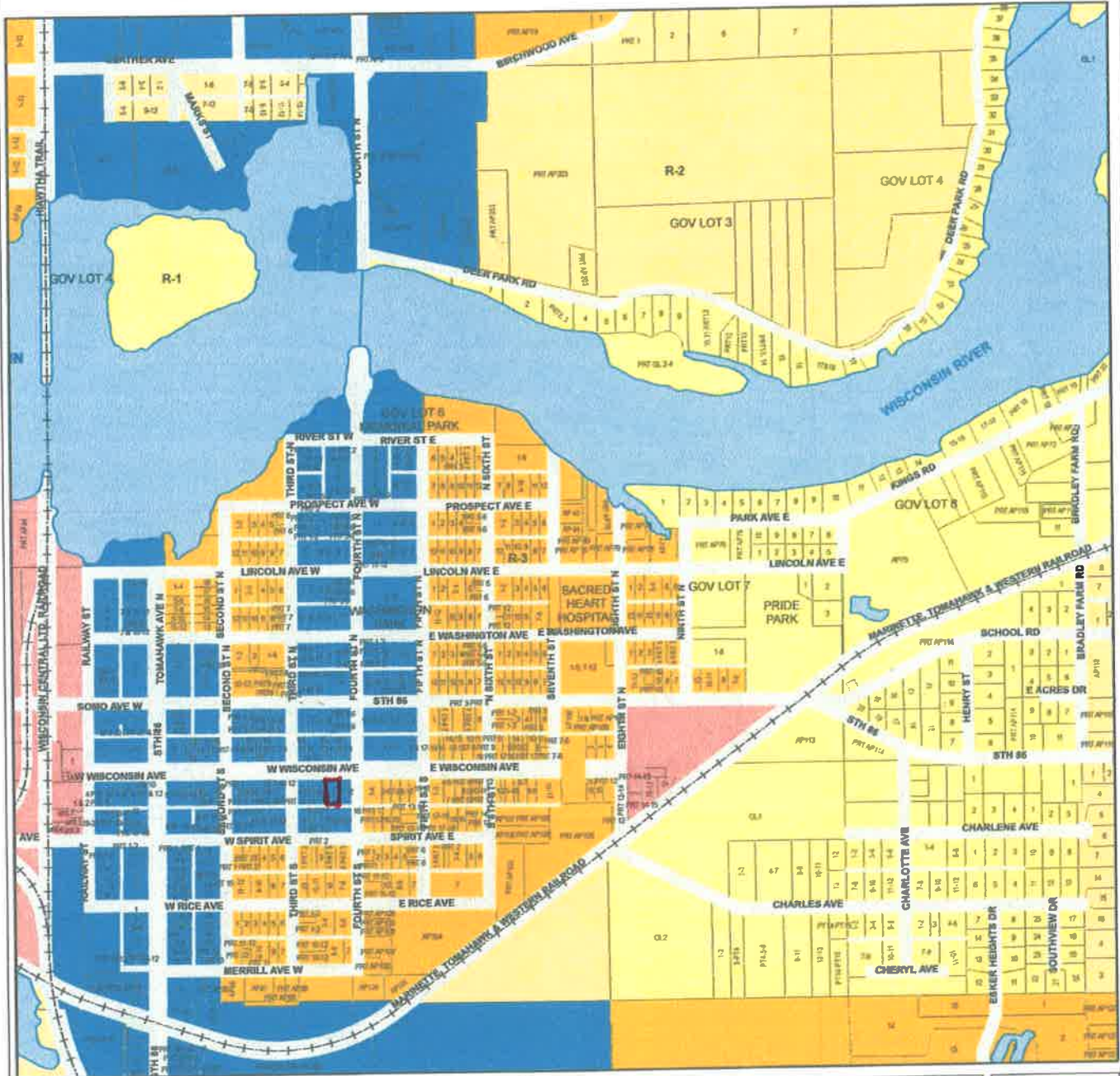
For Resolutions to vacate a part of the alley in Block 7 see 3-434-R-504, Fremont Waller, Register of Deeds

For Resolution see Volume 156 of Deeds on page 173 vacating and re-locating of alley situated on lot 1 & 2 of Blk 3 of Blk 3

New Lot 7 - 500 sq. ft.

F.3 Verification of Zoning

City of Tomahawk, WI Zoning Map - Section 34



0 200 400 800 Feet

Legend

Zoning

- AGRE AGRICULTURAL RURAL ESTATE
- B-1 BUSINESS
- CL #2 GOVERNMENT LOT #2
- GTS GATEWAY TOURIST SERVICE
- M-1 MANUFACTURING
- R-1 SINGLE-FAMILY RESIDENTIAL
- R-2 TWO-FAMILY RESIDENTIAL
- R-3 MULTIPLE-FAMILY RESIDENTIAL

MSA

Map Services - Surveying - Engineering

Professional - Public/General

2014-2015

600 S. 10th St.

La Crosse, WI 54601

F.4. Signed Statement

WDNR BRRTS Case #: 03-35-554426

WDNR Site Name: Luedtke Property

Geographic Information System (GIS) Registry of Closed Remediation Sites

In compliance with the revisions to the NR 700 rule series requiring certain closed sites to be listed on the Geographic Information System (GIS) Registry of Closed Remediation Sites (Registry) effective Nov., 2001, I have provided the following information.

To the best of my knowledge the legal descriptions provided and attached to this statement are complete and accurate.

Responsible Party:

Todd Luedtke owner
(print name/title)

Todd Luedtke 7/20/19
(signature) (date)

Attachment G/Notifications to Owners of Affected Properties

G.A Notification to the City of Tomahawk for residual soil and groundwater contamination located in the ROW of Wisconsin Avenue.

G.B Notification to property owner(s) of an impacted property for residual groundwater contamination on the property located at 3 W Wisconsin Avenue.

G.B.1 Deed

G.C Notification to property owner(s) of an impacted property for residual soil contamination on the property located at 17 W Wisconsin Avenue.

G.C.1 Deed

G.2 Certified Survey Map

G.3 Verification of Zoning

G.4 Signed Statement

6.A

**Notification of Continuing Obligations
and Residual Contamination**

Form 4400-286 (9/15)

C. I. Page

The affected property is:

- the source property (the source of the hazardous substance discharge), but the property is not owned by the person who conducted the cleanup (a deeded property)
 a deeded property affected by contamination from the source property
 a right-of-way (ROW)
 a Department of Transportation (DOT) ROW

Include this completed page as an attachment with all notifications provided under sections A and B.

Contact Information

Responsible Party: The person responsible for sending this form, and for conducting the environmental investigation and cleanup is:

Responsible Party Name Todd Luedtke

Contact Person Last Name Luedtke	First Todd	MI	Phone Number (include area code) (920) 602-4910
Address 426 Crowfoot Ave.	City Fond du Lac	State WI	ZIP Code 54935
E-mail			

Name of Party Receiving Notification:

Business Name, if applicable: City of Tomahawk

Title Ms.	Last Name Bartz	First Amanda	MI L	Phone Number (include area code) (715) 453-4040
Address 23 N 2nd Street P.O. Box 469	City Tomahawk	State WI	ZIP Code 54487	

Site Name and Source Property Information:

Site (Activity) Name Luedtke Property

Address 11 W Wisconsin Avenue	City Tomahawk	State WI	ZIP Code 54487
DNR ID # (BRRTS#) 03-35-554426	(DATCP) ID #		

Contacts for Questions:

If you have any questions regarding the cleanup or about this notification, please contact the Responsible Party identified above, or contact:

Environmental Consultant: METCO

Contact Person Last Name Powell	First Jason	MI	Phone Number (include area code) (608) 781-8879
Address 709 Gillette Street Suite 3	City La Crosse	State WI	ZIP Code 54603
E-mail <u>jasonp@metcohq.com</u>			

Department Contact:

To review the Department's case file, or for questions on cleanups or closure requirements, contact:

Department of: Natural Resources (DNR)

Address 107 Sutliff Ave	City Rhinelander	State WI	ZIP Code 54501
Contact Person Last Name Stoltz	First Carrie	MI	Phone Number (include area code) (715) 365-8942
E-mail (Firstname.Lastname@wisconsin.gov) <u>carrie.stoltz@wisconsin.gov</u>			

G.A

**Notification of Continuing Obligations
and Residual Contamination**

Form 4400-286 (9/15)

Section B: ROW Notification: Residual Contamination and/or Continuing Obligations - Non-DOT ROWs

KEEP THIS DOCUMENT WITH YOUR PROPERTY RECORDS

23 N 2nd Street P.O. Box 469
Tomahawk, WI, 54487

Dear Ms. Bartz:

I am providing this notification to inform you of the location and extent of contamination remaining in a right-of-way for which you are responsible, and of certain long-term responsibilities (continuing obligations) for which city of Tomahawk may become responsible. I investigated a release of:

petroleum

on 11 W Wisconsin Avenue, Tomahawk, WI, 54487 that has shown that contamination

has migrated into the right-of-way for which city of Tomahawk is responsible.

I have responded to the release, and will be requesting that the Department of Natural Resources (DNR) grant case closure. Closure means that the DNR will not be requiring any further investigation or cleanup action to be taken. However, continuing obligations may be imposed as a condition of closure approval.

You have 30 days to comment on the proposed closure request:

The DNR will not review my closure request for at least 30 days after the date of this letter. As an affected right-of-way holder, you have a right to contact the DNR 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 DNR that is relevant to this closure request, you should mail that information to the DNR contact: 107 Sutliff Ave, Rhineland, WI, 54501, or at carrie.stoltz@wisconsin.gov.

Residual Contamination:

Groundwater Contamination:

Groundwater contamination originated at the property located at: 11 W Wisconsin Avenue, Tomahawk, WI, 54487.

The levels of
Benzene

contamination in the groundwater on your property are above the state groundwater enforcement standards found in ch. NR 140, Wis. Adm. Code.

Soil Contamination:

Soil contamination remains at:

W Wisconsin Avenue

The remaining contaminants include :

Lead

at levels which exceed the soil standards found in ch. NR 720, Wis. Adm. Code. The following steps have been taken to address any exposure to the remaining soil contamination.

Natural Attenuation.

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 you or any other person plan to conduct utility or building construction for which dewatering will be necessary, you or that person must contact the DNR's Water Quality 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>.

Continuing Obligations on the Right-of-Way (ROW) : As part of the response actions, I am proposing that the following continuing obligations be used at the affected ROW. If my closure request is approved, you will be responsible for the following continuing obligations:

6.A

Residual Soil Contamination:

If soil is excavated from the areas with residual contamination, the right-of-way holder at the time of excavation will be responsible for the following:

- determine if contamination is present,
 - determine whether the material would be considered solid or hazardous waste,
 - ensure that any storage, treatment or disposal is in compliance with applicable statutes and rules.
- Contaminated soil may be managed in-place, in accordance with s. NR 718, Wis. Adm. Code, with prior Department approval.

The right-of-way holder needs 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 during excavation activities to prevent a health threat to humans from ingestion, inhalation or dermal contact.

Depending on site-specific conditions, construction over contaminated soils or groundwater may result in vapor migration of contaminants into enclosed structures or migration along newly placed underground utility lines. The potential for vapor inhalation and means of mitigation should be evaluated when planning any future redevelopment, and measures should be taken to ensure the continued protection of public health, safety, welfare and the environment at the site.

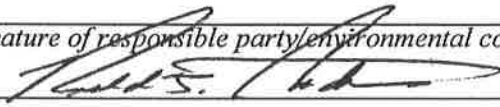
GIS Registry and Well Construction Requirements:

If this site is closed, all properties within the site boundaries where contamination remains, or where a continuing obligation is applied, 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>. Inclusion on this database provides public notice of remaining contamination and of any continuing obligations. Documents can be viewed on this database, and include final closure letters, site maps and any applicable maintenance plans. The location of the site may also be viewed on the Remediation and Redevelopment Sites Map (RR Sites Map), on the "GIS Registry" layer, at the same internet address listed above.

DNR approval prior to well construction or reconstruction is required for all sites included in 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. Special well construction standards may be necessary to protect the well from the remaining contamination. Well drillers need to first 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://dnr.wi.gov/topic/wells/documents/3300254.pdf>.

If you have any questions regarding this notification, I can be reached at: (608) 781-8879
jasonp@metcohq.com

Signature of responsible party/environmental consultant for the responsible party



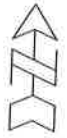

Date Signed

6/2/19

Attachments

Contact Information

Legal Description for each Parcel:

<p>B.3.a.1 GEOLOGIC CROSS SECTION FIGURE LUEDTKE PROPERTY</p>		
 <p>709 Caliente St, Suite 3 Lakewood, CO 80403 Tel: (303) 781-8879 Fax: (303) 781-8823</p>	<p>TOMAHAWK, WISCONSIN DRAWN BY: ED DATE: 04/18/2007</p>	

NOTE: INFORMATION BASED ON AVAILABLE
DATA. ACTUAL CONDITIONS MAY DIFFER.

⊕ - FORMER MONITORING WELL LOCATION - LES STANDARD

⊗ - MONITORING WELL LOCATION - METCO

✕ - SOIL BORING LOCATION

▨ - STORM DRAIN

⊙ - FIRE HYDRANT

● - LIGHT POLE

--- - PROPERTY BOUNDARY

--- - SANITARY SEWER LINE

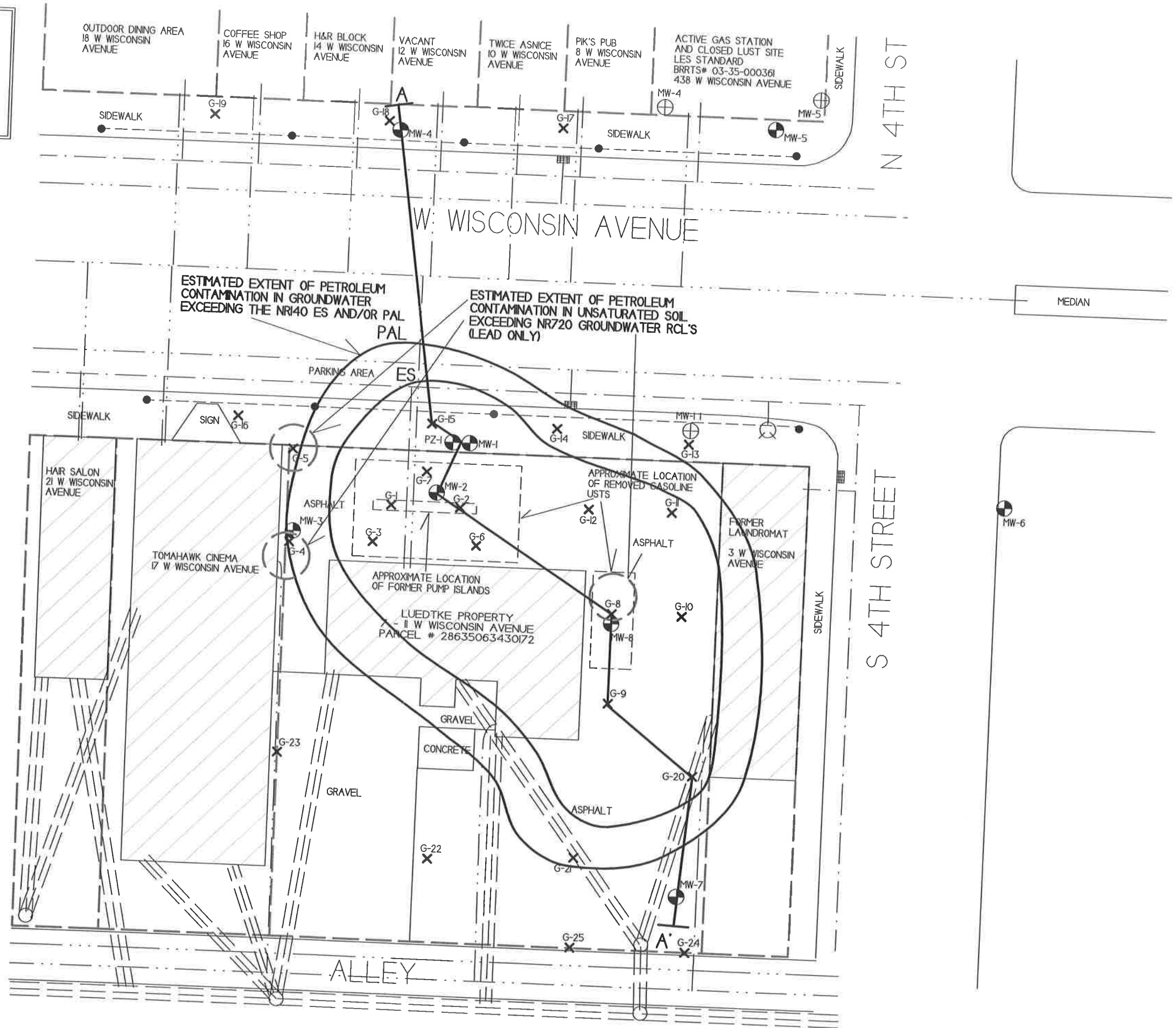
--- - STORM SEWER LINE

--- - WATER LINE


--- - GAS LINE

--- - BURIED ELECTRIC LINE

==||==||==|| - OVERHEAD ELECTRIC



G.A

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY																
<ul style="list-style-type: none"> ■ Complete items 1, 2, and 3. ■ Print your name and address on the reverse so that we can return the card to you. ■ Attach this card to the back of the mailpiece, or on the front if space permits. 	<p>A. Signature</p> <p><input checked="" type="checkbox"/> <i>R. W. Wagon</i> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p>																
<p>Amanda Bartz 23 N. 2nd Street, P.O. Box 469 Tomahawk, WI 54487</p>	<p>B. Received by (Printed Name) C. Date of Delivery</p> <p><i>L. W. Wagon</i> <i>6-10-19</i></p>																
	<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>																
 <p>9590 9403 0958 5223 6285 17</p>	<p>3. Service Type</p> <table border="0"> <tr> <td><input type="checkbox"/> Adult Signature</td> <td><input type="checkbox"/> Priority Mail Express®</td> </tr> <tr> <td><input type="checkbox"/> Adult Signature Restricted Delivery</td> <td><input type="checkbox"/> Registered Mail™</td> </tr> <tr> <td><input checked="" type="checkbox"/> Certified Mail®</td> <td><input type="checkbox"/> Registered Mail Restricted Delivery</td> </tr> <tr> <td><input type="checkbox"/> Certified Mail Restricted Delivery</td> <td><input type="checkbox"/> Return Receipt for Merchandise</td> </tr> <tr> <td><input type="checkbox"/> Collect on Delivery</td> <td><input type="checkbox"/> Signature Confirmation™</td> </tr> <tr> <td><input type="checkbox"/> Collect on Delivery Restricted Delivery</td> <td><input type="checkbox"/> Signature Confirmation Restricted Delivery</td> </tr> <tr> <td><input type="checkbox"/> Insured Mail</td> <td></td> </tr> <tr> <td><input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)</td> <td></td> </tr> </table>	<input type="checkbox"/> Adult Signature	<input type="checkbox"/> Priority Mail Express®	<input type="checkbox"/> Adult Signature Restricted Delivery	<input type="checkbox"/> Registered Mail™	<input checked="" type="checkbox"/> Certified Mail®	<input type="checkbox"/> Registered Mail Restricted Delivery	<input type="checkbox"/> Certified Mail Restricted Delivery	<input type="checkbox"/> Return Receipt for Merchandise	<input type="checkbox"/> Collect on Delivery	<input type="checkbox"/> Signature Confirmation™	<input type="checkbox"/> Collect on Delivery Restricted Delivery	<input type="checkbox"/> Signature Confirmation Restricted Delivery	<input type="checkbox"/> Insured Mail		<input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)	
<input type="checkbox"/> Adult Signature	<input type="checkbox"/> Priority Mail Express®																
<input type="checkbox"/> Adult Signature Restricted Delivery	<input type="checkbox"/> Registered Mail™																
<input checked="" type="checkbox"/> Certified Mail®	<input type="checkbox"/> Registered Mail Restricted Delivery																
<input type="checkbox"/> Certified Mail Restricted Delivery	<input type="checkbox"/> Return Receipt for Merchandise																
<input type="checkbox"/> Collect on Delivery	<input type="checkbox"/> Signature Confirmation™																
<input type="checkbox"/> Collect on Delivery Restricted Delivery	<input type="checkbox"/> Signature Confirmation Restricted Delivery																
<input type="checkbox"/> Insured Mail																	
<input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)																	
<p>2 Article Number (Transfer from service label)</p> <p>7015 1660 0000 4342 8834</p>	<p>PS Form 3811, July 2015 PSN 7530-02-000-9053 Domestic Return Receipt</p>																

6.B

Notification of Continuing Obligations and Residual Contamination

Form 4400-286 (9/15)

C. I. Page

The affected property is:

- the source property (the source of the hazardous substance discharge), but the property is not owned by the person who conducted the cleanup (a deeded property)
○ a deeded property affected by contamination from the source property
○ a right-of-way (ROW)
○ a Department of Transportation (DOT) ROW

Include this completed page as an attachment with all notifications provided under sections A and B.

Contact Information

Responsible Party: The person responsible for sending this form, and for conducting the environmental investigation and cleanup is:

Responsible Party Name Todd Luedtke

Contact Person Last Name Luedtke, First Todd, MI, Phone Number (include area code) (920) 602-4910, Address 426 Crowfoot Ave., City Fond du Lac, State WI, ZIP Code 54935, E-mail

Name of Party Receiving Notification:

Business Name, if applicable:

Title Mr., Last Name Osero, First Daniel, MI L, Phone Number (include area code), Address P.O Box 343, City Tomahawk, State WI, ZIP Code 54487

Site Name and Source Property Information:

Site (Activity) Name Luedtke Property

Address 11 W Wisconsin Avenue, City Tomahawk, State WI, ZIP Code 54487, DNR ID # (BRRTS#) 03-35-554426, (DATCP) ID #

Contacts for Questions:

If you have any questions regarding the cleanup or about this notification, please contact the Responsible Party identified above, or contact:

Environmental Consultant: METCO

Contact Person Last Name Powell, First Jason, MI, Phone Number (include area code) (608) 781-8879, Address 709 Gillette Street Suite 3, City La Crosse, State WI, ZIP Code 54603, E-mail jasonp@metcohq.com

Department Contact:

To review the Department's case file, or for questions on cleanups or closure requirements, contact:

Department of: Natural Resources (DNR)

Address 107 Sutliff Ave, City Rhinelander, State WI, ZIP Code 54501, Contact Person Last Name Stoltz, First Carrie, MI, Phone Number (include area code) (715) 365-8942, E-mail (Firstname.Lastname@wisconsin.gov) carrie.stoltz@wisconsin.gov

G.B

Section A: Deeded Property Notification: Residual Contamination and/or Continuing Obligations

KEEP THIS DOCUMENT WITH YOUR PROPERTY RECORDS

P.O Box 343
Tomahawk, WI, 54487

Dear Mr. Osero:

I am providing this letter to inform you of the location and extent of contamination remaining on your property, and of certain long-term responsibilities (continuing obligations) for which you may become responsible. I have investigated a release of:

petroleum

on 11 W Wisconsin Avenue, Tomahawk, WI, 54487 that has shown that contamination has migrated onto your property. I have responded to the release and will be requesting that the Department of Natural Resources (DNR) grant case closure. Closure means that the DNR will not be requiring any further investigation or cleanup action to be taken. However, continuing obligations may be imposed as a condition of closure approval.

You have 30 days to comment on the attached legal description of your property and on the proposed closure request:

Please review the enclosed legal description of your property, and notify Jason Powell at 709 Gillette Street Suite 3, La Crosse, WI, 54603 within the next 30 days if the legal description is incorrect.

The DNR will not review my closure request for at least 30 days after the date of receipt of this letter. As an affected property owner, you have a right to contact the DNR 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 that is relevant to this closure request, or if you want to waive the 30 day comment period, you should mail that information to the DNR contact: 107 Sutliff Ave, Rhinelander, WI, 54501, or at carrie.stoltz@wisconsin.gov.

Your Long-Term Responsibilities as a Property Owner and Occupant:

The responses included

completion of a drilling project, geoprobe project, and numerous rounds of groundwater sampling

The continuing obligations I am proposing that affect your property are listed below, under the heading **Continuing Obligations**. Under s. 292.12 (5), Wis. Stats., current and future owners and occupants of this property are responsible for complying with continuing obligations imposed as part of an approved closure.

The fact sheet "Continuing Obligations for Environmental Protection" (DNR publication RR 819) has been included with this letter, to help explain the responsibilities you may have for maintenance of a certain continuing obligation, the limits of any liability for investigation and cleanup of contamination, and how these differ. If the fact sheet is lost, you may obtain copies at <http://dnr.wi.gov/files/PDF/pubs/rr/RR819.pdf>.

Contract for responsibility for continuing obligation:

Before I request closure, I will need to inform the DNR as to whom will be responsible for the continuing obligation/s on your property.

No contract has been worked out between affected property owner and Responsible Party.

Under s. 292.12, Wis. Stats., the responsibility for maintaining all necessary continuing obligations for your property will fall on you or any subsequent property owner, unless another person has a legally enforceable responsibility to comply with the requirements of the final closure letter. If you need more time to finalize an agreement on the responsibility for the continuing obligations on your Property, you may request additional time from the DNR contact identified in **Contact Information**.

(Note: Future property owners would need to negotiate a new agreement.)

6.B

Groundwater Contamination:

Groundwater contamination originated at the property located at 11 W Wisconsin Avenue, Tomahawk, WI, 54487. Contaminated groundwater has migrated onto your property at:

3 W Wisconsin Avenue

The levels of

Benzene, Ethylbenzene, Naphthalene, and Trimethylbenzenes.

contamination in the groundwater on your property are above the state groundwater enforcement standards found in ch. NR 140, Wis. Adm. Code.

However, the environmental consultants who have investigated this contamination have informed me that this groundwater contaminant plume is stable or receding and will naturally degrade over time. I believe that allowing natural attenuation, or the breakdown of contaminants in groundwater due to naturally occurring processes, to complete the cleanup at this site will meet the case closure requirements of ch. NR 726, Wis. Adm. Code. As part of my request for case closure, I am requesting that the DNR accept natural attenuation as the final remedy for this site.

The following DNR fact sheet (RR 671, "What Landowners Should Know: Information About Using Natural Attenuation to Clean Up Contaminated Groundwater") has been included with this notification, to help explain the use of natural attenuation as a remedy. If the fact sheet is lost, you may obtain a copy at <http://dnr.wi.gov/files/PDF/pubs/tr/RR671.pdf>.

Continuing Obligations on Your Property: As part of the cleanup, I am proposing that the following continuing obligations be used at your property, to address future exposure to residual contamination. If my closure request is approved, you will be responsible for the following continuing obligations.

To construct a new well or to reconstruct an existing well, the property owner at the time of construction or reconstruction will need to obtain prior approval from the DNR. See the paragraph **GIS Registry and Well Construction Requirements**. Typically, this results in casing off a portion of the aquifer during drilling, when needed, to protect the water supply.

Maintenance and Audits of Continuing Obligations:

If compliance with a maintenance plan is required as part of a continuing obligation, an inspection log will need to be filled out periodically, and kept available for inspection by the DNR. Submittal of the inspection log may also be required. You will also need to notify any future owners or occupants of this property of the need to maintain the continuing obligation and to document that maintenance in the inspection log. Periodic audits of these continuing obligations may be conducted by the DNR, to ensure that potential exposure to residual contamination is being addressed. The DNR provides notification before conducting site visits as part of the audit.

GIS Registry and Well Construction Requirements:

If this site is closed, all properties within the site boundaries where contamination remains, or where a continuing obligation is applied, 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>. Inclusion on this database provides public notice of remaining contamination and of any continuing obligations. Documents can be viewed on this database, and include final closure letters, site maps and any applicable maintenance plans. The location of the site may also be viewed on the Remediation and Redevelopment Sites Map (RR Sites Map), on the "GIS Registry" layer, at the same internet address listed above.

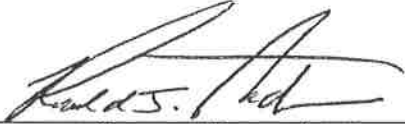
DNR approval prior to well construction or reconstruction is required for all sites included in the GIS Registry, in accordance with s. NR 812.09 (4) (w), Wis. Adm. Code. This requirement applies to private drinking water wells and high capacity wells. Special well construction standards may be necessary to protect the well from the remaining contamination. Well drillers need to first 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://dnr.wi.gov/topic/wells/documents/3300254.pdf>.

Site Closure:

If the DNR grants closure, you will receive a letter which defines the specific continuing obligations on your property. The status of the site (open or closed) may also be checked by searching BRRTS on the Web. You may view or download a copy of the closure letter (sent to the responsible party) from BRRTS on the Web. You may also request a copy of the closure letter from the **responsible party** or by writing to the DNR contact, at Carrie Stoltz, carrie.stoltz@wisconsin.gov, (715) 365-8942. The final closure letter will contain a description of the continuing obligation, any prohibitions on activities and will include any applicable maintenance plan.

G.B

If you have any questions regarding this notification, I can be reached at: (608) 781-8879
jasonp@metcohq.com



Signature of responsible party/environmental consultant for the responsible party

Date Signed _____

Attachments

Contact Information

Legal Description for each Parcel:

Factsheets:


RR 819, Continuing Obligations for Environmental Protection

RR 671, What Landowners Should Know: Information About Using Natural Attenuation to Clean Up Contaminated Groundwater

B.3.a.1 GEOLOGIC
CROSS SECTION FIGURE
LUEDTKE PROPERTY

METCO
709 Cahille St. Suite 3
La Crosse, WI 54603
Tel: (608) 781-6579
Fax: (608) 781-6593

**TOMAHAWK
WISCONSIN**
DRAWN BY: ED
DATE: 06/16/2007



NOTE: INFORMATION BASED ON AVAILABLE
DATA ACTUAL CONDITIONS MAY DIFFER

⊕ - FORMER MONITORING WELL LOCATION - LES STANDARD

⊙ - MONITORING WELL LOCATION - METCO

✕ - SOIL BORING LOCATION

▨ - STORM DRAIN

⊙ - FIRE HYDRANT

● - LIGHT POLE

--- - PROPERTY BOUNDARY

--- - SANITARY SEWER LINE

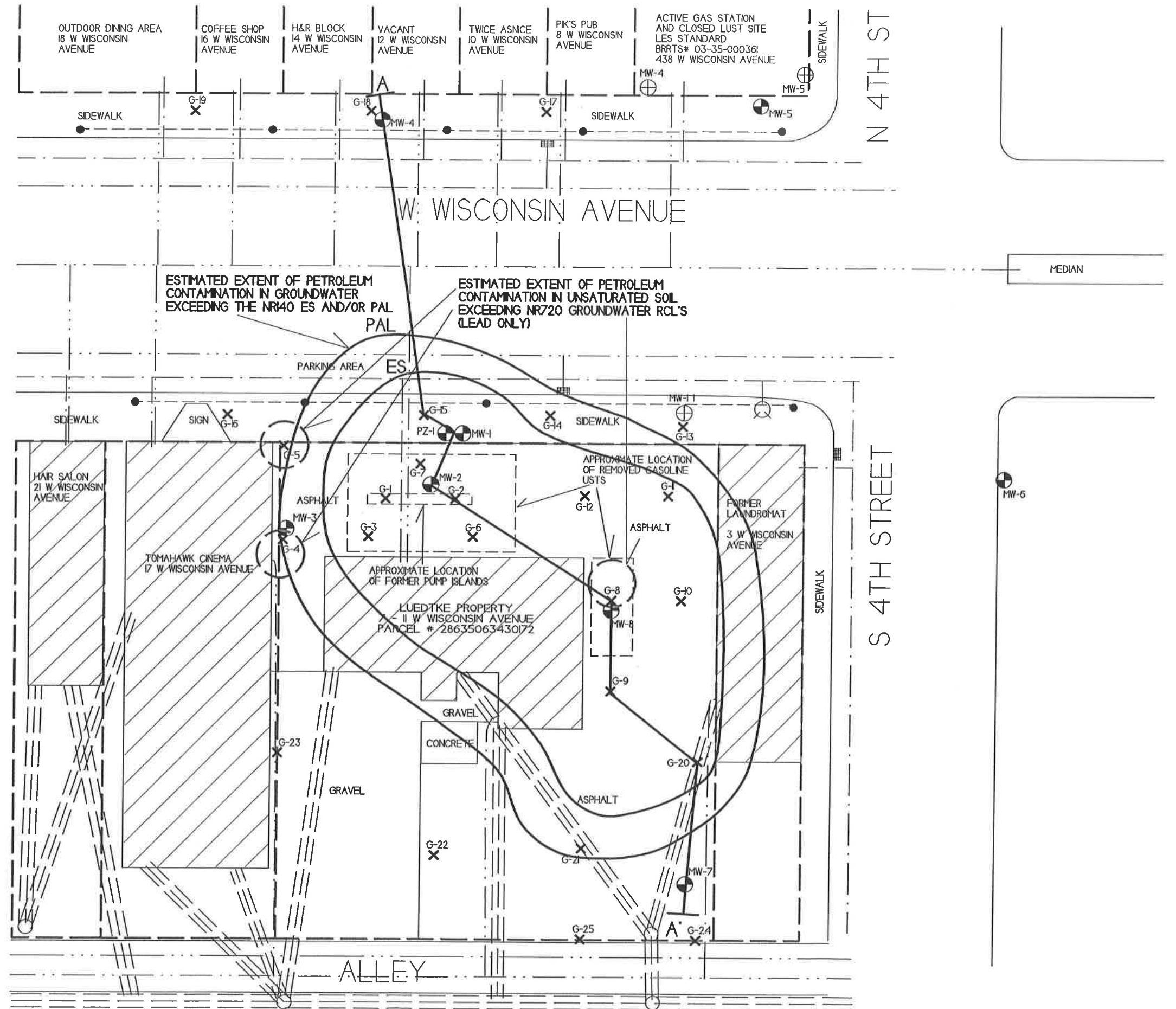
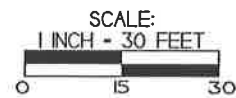
--- - STORM SEWER LINE

--- - WATER LINE


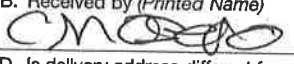
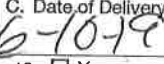

--- - GAS LINE

--- - BURIED ELECTRIC LINE

--- - OVERHEAD ELECTRIC



6.B

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY																
<ul style="list-style-type: none">■ Complete items 1, 2, and 3.■ Print your name and address on the reverse so that we can return the card to you.■ Attach this card to the back of the mailpiece, or on the front if space permits.	<p>A. Signature  <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name)  C. Date of Delivery </p>																
<p>1.  9590 9403 0958 5223 6285 00</p> <p>Daniel Osero P.O. Box 343 Tomahawk, WI 54487</p>	<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>																
<p>2. Article Number (Transfer from service label) 7015 1660 0000 4342 8827</p>	<p>3. Service Type</p> <table border="0"><tr><td><input type="checkbox"/> Adult Signature</td><td><input type="checkbox"/> Priority Mail Express®</td></tr><tr><td><input type="checkbox"/> Adult Signature Restricted Delivery</td><td><input type="checkbox"/> Registered Mail™</td></tr><tr><td><input type="checkbox"/> Certified Mail®</td><td><input type="checkbox"/> Registered Mail Restricted Delivery</td></tr><tr><td><input checked="" type="checkbox"/> Certified Mail Restricted Delivery</td><td><input type="checkbox"/> Return Receipt for Merchandise</td></tr><tr><td><input type="checkbox"/> Collect on Delivery</td><td><input type="checkbox"/> Signature Confirmation™</td></tr><tr><td><input type="checkbox"/> Collect on Delivery Restricted Delivery</td><td><input type="checkbox"/> Signature Confirmation Restricted Delivery</td></tr><tr><td><input type="checkbox"/> Insured Mail</td><td></td></tr><tr><td><input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)</td><td></td></tr></table>	<input type="checkbox"/> Adult Signature	<input type="checkbox"/> Priority Mail Express®	<input type="checkbox"/> Adult Signature Restricted Delivery	<input type="checkbox"/> Registered Mail™	<input type="checkbox"/> Certified Mail®	<input type="checkbox"/> Registered Mail Restricted Delivery	<input checked="" type="checkbox"/> Certified Mail Restricted Delivery	<input type="checkbox"/> Return Receipt for Merchandise	<input type="checkbox"/> Collect on Delivery	<input type="checkbox"/> Signature Confirmation™	<input type="checkbox"/> Collect on Delivery Restricted Delivery	<input type="checkbox"/> Signature Confirmation Restricted Delivery	<input type="checkbox"/> Insured Mail		<input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)	
<input type="checkbox"/> Adult Signature	<input type="checkbox"/> Priority Mail Express®																
<input type="checkbox"/> Adult Signature Restricted Delivery	<input type="checkbox"/> Registered Mail™																
<input type="checkbox"/> Certified Mail®	<input type="checkbox"/> Registered Mail Restricted Delivery																
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<input type="checkbox"/> Collect on Delivery	<input type="checkbox"/> Signature Confirmation™																
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<p>PS Form 3811, July 2015 PSN 7530-02-000-9053</p>	<p>Domestic Return Receipt</p>																

G. B. 1 Deed

WARRANTY DEED—by Corporation
STATE OF WISCONSIN—FORM 2
THIS SPACE RESERVED FOR RECORDING DATA

THIS INDENTURE, Made this 10th day of December
A. D., 1986, between JAFCO, Inc.

_____ a Corporation
duly organized and existing under and by virtue of the laws of the State of Wisconsin, located
at Tomahawk Wisconsin, party of the first part and
Daniel L. Osero and Linda A. Osero

part ies of the second part,
Witnesseth, That the said party of the first part, for and in consideration
of the sum of ONE HUNDRED THOUSAND & 00/100 (\$100 000.)

_____ to it paid by the said part ies of the second part, the receipt whereof is hereby
confessed and acknowledged, has given, granted, bargained, sold, remised, released, aliened, conveyed and confirmed, and by these presents
does give, grant, bargain, sell, remise, release, alien, convey and confirm unto the said part ies of the second part, their heirs and assigns
forever, the following described real estate situated in the County of Lincoln and State of Wisconsin, to-wit:

LOT 12, BLOCK 17, OF ORIGINAL PLAT OF CITY OF TOMAHAWK

1/23/92
TRANSFER
\$300.00
FEE

FEE
\$77.25 (15%
EXEMPT

(IF NECESSARY, CONTINUE DESCRIPTION ON REVERSE SIDE)

Together with all and singular the hereditaments and appurtenances thereunto belonging or in any wise appertaining; and all the estate
right, title, interest, claim or demand whatsoever, of the said party of the first part, either in law or equity, either in possession or expectancy
of, in and to the above bargained premises, and their hereditaments and appurtenances.

To Have and To Hold the said premises as above described with the hereditaments and appurtenances, unto the said part ies of the
second part, and to their heirs and assigns FOREVER.

And the said JAFCO, Inc.

party of the first part, for itself and its successors, does covenant, grant, bargain and agree to and with the said part ies of the
second part, their heirs and assigns, that at the time of the ensembling and delivery of these presents it is well seized of the
premises above described, as of a good, sure, perfect, absolute and indefeasible estate of inheritance in the law, in fee simple, and that the
same are free and clear from all incumbrances whatever, except: Buyer to assume existing mortgage
loan with Bradley Bank of Tomahawk, Wis. in the amount of: \$61,631.81

and that the above bargained premises in the quiet and peaceable possession of the said part ies of the second part their heirs and assigns,
against all and every person or persons lawfully claiming the whole or any part thereof, it will forever WARRANT AND DEFEND.

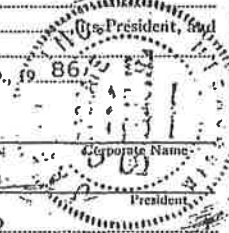
In Witness Whereof, the said JAFCO, Inc. (A Wisconsin Corporation)

party of the first part, has caused these presents to be signed by Daniel L. Osero
countersigned by Graham Foster Jr., its Secretary, at Tomahawk
Wisconsin, and its corporate seal to be hereunto affixed, this 10th day of December, A. D., 19 86

SIGNED AND SEALED IN PRESENCE OF

Jack Sennhenn
Jack Sennhenn
Joanne M. Foster
JOANNE M. FOSTER

JAFCO, Inc
Daniel L. Osero
COUNTERSIGNED:
Graham Foster Jr.
Graham Foster Jr.



STATE OF WISCONSIN,
Lincoln County, } ss.
Personally came before me, this 10th day of December, A. D., 19 86
Daniel L. Osero, President, and Graham Foster Jr., Secretary of the above
named Corporation, to me known to be the persons who executed the foregoing instrument, and to me known to be such _____ President
and _____ Secretary of said Corporation, and acknowledged that they executed the foregoing instrument as such officers as the
deed of said Corporation, by its authority.



This instrument drafted by

Daniel L. Osero Wis. Reg. _____

Debra L. Gessler
Debra L. Gessler
Notary Public, Lincoln County, Wis.
My Commission (Expires) (Is) Dec. 3, 1989

G.C

Notification of Continuing Obligations and Residual Contamination

Form 4400-286 (9/15)

C. I. Page

The affected property is:

- radio button options: the source property, a deeded property affected by contamination, a right-of-way (ROW), a Department of Transportation (DOT) ROW

Include this completed page as an attachment with all notifications provided under sections A and B.

Contact Information

Responsible Party: The person responsible for sending this form, and for conducting the environmental investigation and cleanup is:

Responsible Party Name Todd Luedtke

Form with fields: Contact Person Last Name (Luedtke), First (Todd), MI, Phone Number ((920) 602-4910), Address (426 Crowfoot Ave.), City (Fond du Lac), State (WI), ZIP Code (54935), E-mail

Name of Party Receiving Notification:

Business Name, if applicable:

Form with fields: Title (Mr.), Last Name (Billek), First (James), MI (J), Phone Number, Address (W7181 Clover Lane), City (Phillips), State (WI), ZIP Code (54555)

Site Name and Source Property Information:

Site (Activity) Name Luedtke Property

Form with fields: Address (11 W Wisconsin Avenue), City (Tomahawk), State (WI), ZIP Code (54487), DNR ID # (03-35-554426), (DATCP) ID #

Contacts for Questions:

If you have any questions regarding the cleanup or about this notification, please contact the Responsible Party identified above, or contact:

Environmental Consultant: METCO

Form with fields: Contact Person Last Name (Powell), First (Jason), MI, Phone Number ((608) 781-8879), Address (709 Gillette Street Suite 3), City (La Crosse), State (WI), ZIP Code (54603), E-mail (jasonp@metcohq.com)

Department Contact:

To review the Department's case file, or for questions on cleanups or closure requirements, contact:

Department of: Natural Resources (DNR) Office: Rhinelander

Form with fields: Address (107 Sutliff Ave), City (Rhinelander), State (WI), ZIP Code (54501), Contact Person Last Name (Stoltz), First (Carrie), MI, Phone Number ((715) 365-8942), E-mail (carrie.stoltz@wisconsin.gov)

G.C

Section A: Deeded Property Notification: Residual Contamination and/or Continuing Obligations

KEEP THIS DOCUMENT WITH YOUR PROPERTY RECORDS

W7181 Clover Lane
Phillips, WI, 54555

Dear Mr. Billek:

I am providing this letter to inform you of the location and extent of contamination remaining on your property, and of certain long-term responsibilities (continuing obligations) for which you may become responsible.

I have investigated a release of:

Petroleum

on 11 W Wisconsin Avenue, Tomahawk, WI, 54487 that has shown that contamination has migrated onto your property. I have responded to the release and will be requesting that the Department of Natural Resources (DNR) grant case closure. Closure means that the DNR will not be requiring any further investigation or cleanup action to be taken. However, continuing obligations may be imposed as a condition of closure approval.

You have 30 days to comment on the attached legal description of your property and on the proposed closure request:

Please review the enclosed legal description of your property, and notify Jason Powell at 709 Gillette Street Suite 3, La Crosse, WI, 54603 within the next 30 days if the legal description is incorrect.

The DNR will not review my closure request for at least 30 days after the date of receipt of this letter. As an affected property owner, you have a right to contact the DNR 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 that is relevant to this closure request, or if you want to waive the 30 day comment period, you should mail that information to the DNR contact: 107 Sutliff Ave, Rhinelander, WI, 54501, or at carrie.stoltz@wisconsin.gov.

Your Long-Term Responsibilities as a Property Owner and Occupant:

The responses included

Numerous rounds of groundwater and soil sampling.

The continuing obligations I am proposing that affect your property are listed below, under the heading **Continuing Obligations**. Under s. 292.12 (5), Wis. Stats., current and future owners and occupants of this property are responsible for complying with continuing obligations imposed as part of an approved closure.

The fact sheet "Continuing Obligations for Environmental Protection" (DNR publication RR 819) has been included with this letter, to help explain the responsibilities you may have for maintenance of a certain continuing obligation, the limits of any liability for investigation and cleanup of contamination, and how these differ. If the fact sheet is lost, you may obtain copies at <http://dnr.wi.gov/files/PDF/pubs/rr/RR819.pdf>.

Contract for responsibility for continuing obligation:

Before I request closure, I will need to inform the DNR as to whom will be responsible for the continuing obligation/s on your property.

No contract has been worked out with RP.

Under s. 292.12, Wis. Stats., the responsibility for maintaining all necessary continuing obligations for your property will fall on you or any subsequent property owner, unless another person has a legally enforceable responsibility to comply with the requirements of the final closure letter. If you need more time to finalize an agreement on the responsibility for the continuing obligations on your Property, you may request additional time from the DNR contact identified in **Contact Information**.

(Note: Future property owners would need to negotiate a new agreement.)

6.C

Remaining Contamination:

Soil Contamination:

Soil contamination remains at :
17 W Wisconsin Avenue

The remaining contaminants include:

Lead

at levels which exceed the soil standards found in ch. NR 720, Wis. Adm. Code. The following steps have been taken to address any exposure to the remaining soil contamination.

Natural Attenuation.

Continuing Obligations on Your Property: As part of the cleanup, I am proposing that the following continuing obligations be used at your property, to address future exposure to residual contamination. If my closure request is approved, you will be responsible for the following continuing obligations.

To construct a new well or to reconstruct an existing well, the property owner at the time of construction or reconstruction will need to obtain prior approval from the DNR. See the paragraph **GIS Registry and Well Construction Requirements**. Typically, this results in casing off a portion of the aquifer during drilling, when needed, to protect the water supply.

Residual Soil Contamination:

If soil is excavated from the areas with residual contamination, the property owner at the time of excavation will be responsible for the following:

- determine if contamination is present
- determine whether the material would be considered solid or hazardous waste
- ensure that any storage, treatment or disposal is in compliance with applicable statutes and rules.

Contaminated soil may be managed in-place, in accordance with ch. NR 718, Wis. Adm. Code, with prior DNR approval. In addition, all current and future property 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 during excavation activities to prevent a health threat to humans.

Depending on site-specific conditions, construction over contaminated soils or groundwater may result in vapor migration of contaminants into enclosed structures or migration along underground utility lines. The potential for vapor inhalation and means of mitigation should be evaluated when planning any future redevelopment, and measures should be taken to ensure the continued protection of public health, safety, welfare and the environment at the site.

Maintenance and Audits of Continuing Obligations:

If compliance with a maintenance plan is required as part of a continuing obligation, an inspection log will need to be filled out periodically, and kept available for inspection by the DNR. Submittal of the inspection log may also be required. You will also need to notify any future owners or occupants of this property of the need to maintain the continuing obligation and to document that maintenance in the inspection log. Periodic audits of these continuing obligations may be conducted by the DNR, to ensure that potential exposure to residual contamination is being addressed. The DNR provides notification before conducting site visits as part of the audit.

GIS Registry and Well Construction Requirements:

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6.C

**Notification of Continuing Obligations
and Residual Contamination**

Form 4400-286 (9/15)

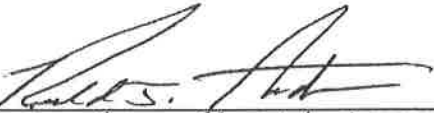
Page 3 of 3

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If you have any questions regarding this notification, I can be reached at: (608) 781-8879

jasonp@metcohq.com



Signature of responsible party/environmental consultant for the responsible party

Date Signed

6/7/19

Attachments

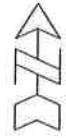
Contact Information

Legal Description for each Parcel:

Factsheets:

RR 819, Continuing Obligations for Environmental Protection

B.3.a.1 GEOLOGIC
CROSS SECTION FIGURE
LUEDTKE PROPERTY



TOMAHAWK,
WISCONSIN
DRAWN BY: ED
DATE: 04/18/2007

NOTE: INFORMATION BASED ON AVAILABLE
DATA ACTUAL CONDITIONS MAY DIFFER

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⊙ - MONITORING WELL LOCATION - METCO

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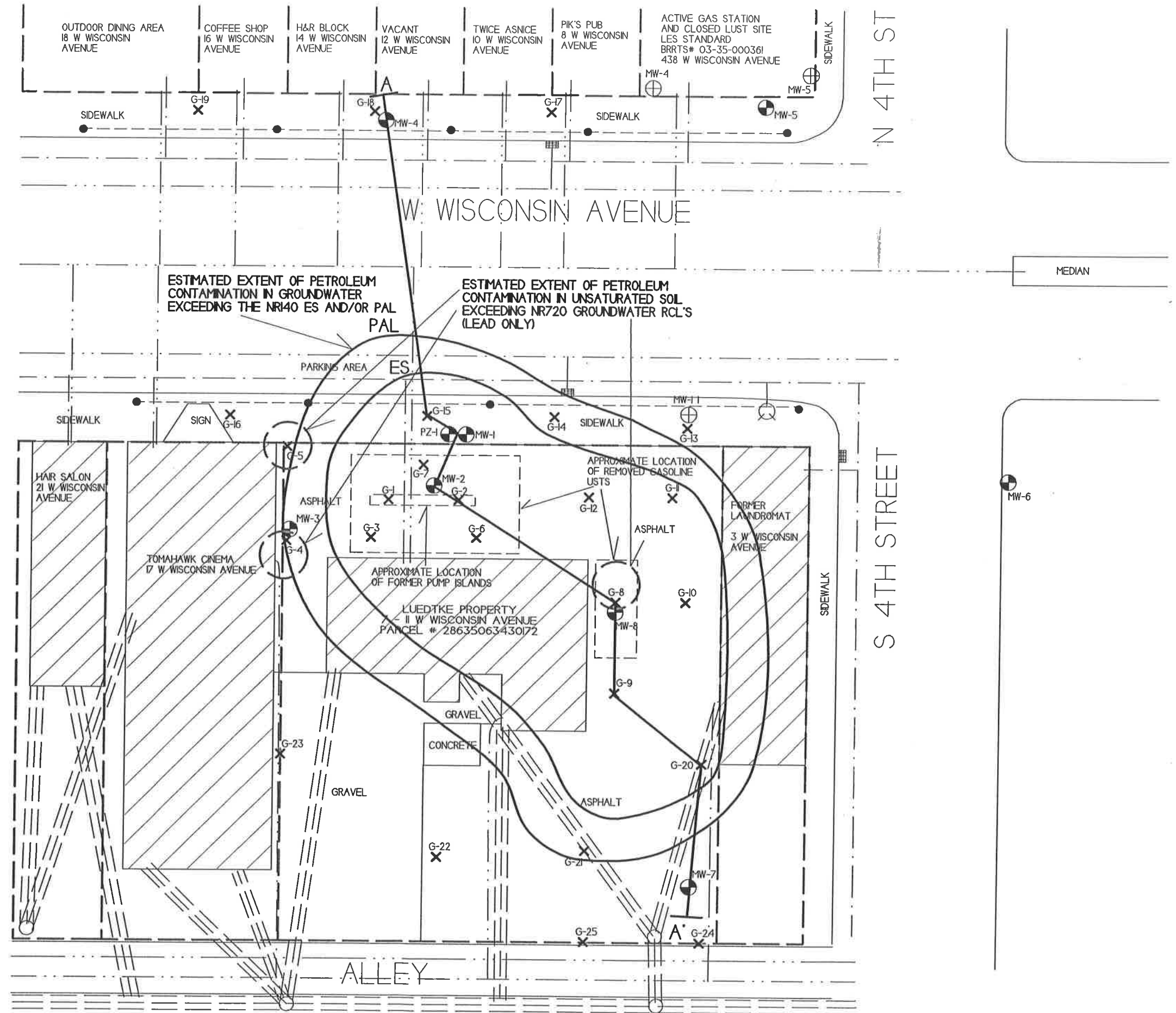
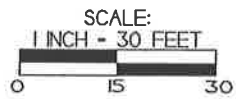
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G.C

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<p>1. Article</p> <div style="border: 1px solid black; padding: 5px; text-align: center;"> <p>James Billek W7181 Clover Lane Phillips, WI 54555</p> </div>  <p>9590 9403 0958 5223 6285 24</p>	<p>B. Received by (Printed Name) <i>Kathleen Billek</i></p> <p>C. Date of Delivery <i>6/12/19</i></p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>																
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<p>PS Form 3811, July 2015 PSN 7530-02-000-9053</p>	<p>Domestic Return Receipt</p>																

STATE BAR OF WISCONSIN FORM 1 - 1982
WARRANTY DEED

DOCUMENT NO.

409084

G.C.1 Deed

RECEIVED
LINCOLN COUNTY, WIS

2002 AUG 7 PM 2 57

Glenn Peterson
REGISTER OF DEEDS

This Deed, made between James P. Norton, a
single person

_____, Grantor,
and James J. Billek and Kathleen D. Billek
Husband and Wife, as survivorship
marital property
_____, Grantee,

Witnesseth, That the said Grantor, for a valuable consideration
conveys to Grantee the following described real estate in Lincoln
County, State of Wisconsin:

Lots Five (5) and Six (6), Block Seventeen
(17), Plat of Tomahawk, City of Tomahawk,
Lincoln County, Wisconsin.

THIS SPACE RESERVED FOR RECORDING DATA

NAME AND RETURN ADDRESS
James and Kathleen Billek
W 7181 Clover Ln. *11.00 PD.*
Phillips, WI 54555 *T.G.B.*
Act: 8-19734

TRANSFER
243.90
FEE

36.0002.000.302.00.00
Parcel Identification Number

This is not homestead property.
(is) (is not)

Together with all and singular the hereditaments and appurtenances thereunto belonging;
And

warrants that the title is good, indefeasible in fee simple and free and clear of encumbrances except
Real Estate Taxes for the current year (2002), easements and conditions
of record and public and private rights for street, highway and/or alley
purposes.
and will warrant and defend the same.

Dated this 2 day of August, 2002

James P. Norton (SEAL)
James P. Norton

_____, (SEAL)

_____, (SEAL)

_____, (SEAL)

AUTHENTICATION

Signature(s) _____
authenticated this _____ day of _____, 19____

ACKNOWLEDGMENT

STATE OF WISCONSIN,

} ss.
Lincoln County, 2 day of
August, 2002, the above named
James P. Norton

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
David E. Breedlove
PO Box 798
WOODRUFF, WI 54568

Kathy Rankin
KATHY RANKIN
Notary Public, _____ County, Wis.
My Commission is permanent. (If not, state expiration date:
8/20/04)

(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.

6.2 Certified Survey Map.

Vol. 2 - Page 2

OFFICIAL COPY

29



For final resolution discontinuing part of Lincoln Ave. between east line of alley in Blk 1, sec. 17 and the W line of N. Tomahawk Ave. see Vol. 531-A-559 Jolene Callahan, Register of Deeds

For Discontinuing Alley in File 3271 - filed 2/21/76, discontinuing Part 1, N-S Alley in Blk 8, Original Plat of City of Tomahawk which is approximately 5 feet C & W x 16 feet N & S on the eastern side of the alley. Jolene Callahan, Register of Deeds.

For Order Discontinuing a small area on east side of the North-South alley in Blk 8, see Vol. 574-A-410, Jolene Callahan, Register of Deeds.

Plat of Tomahawk
Lincoln Co. Wis.
Scale 150 feet per inch

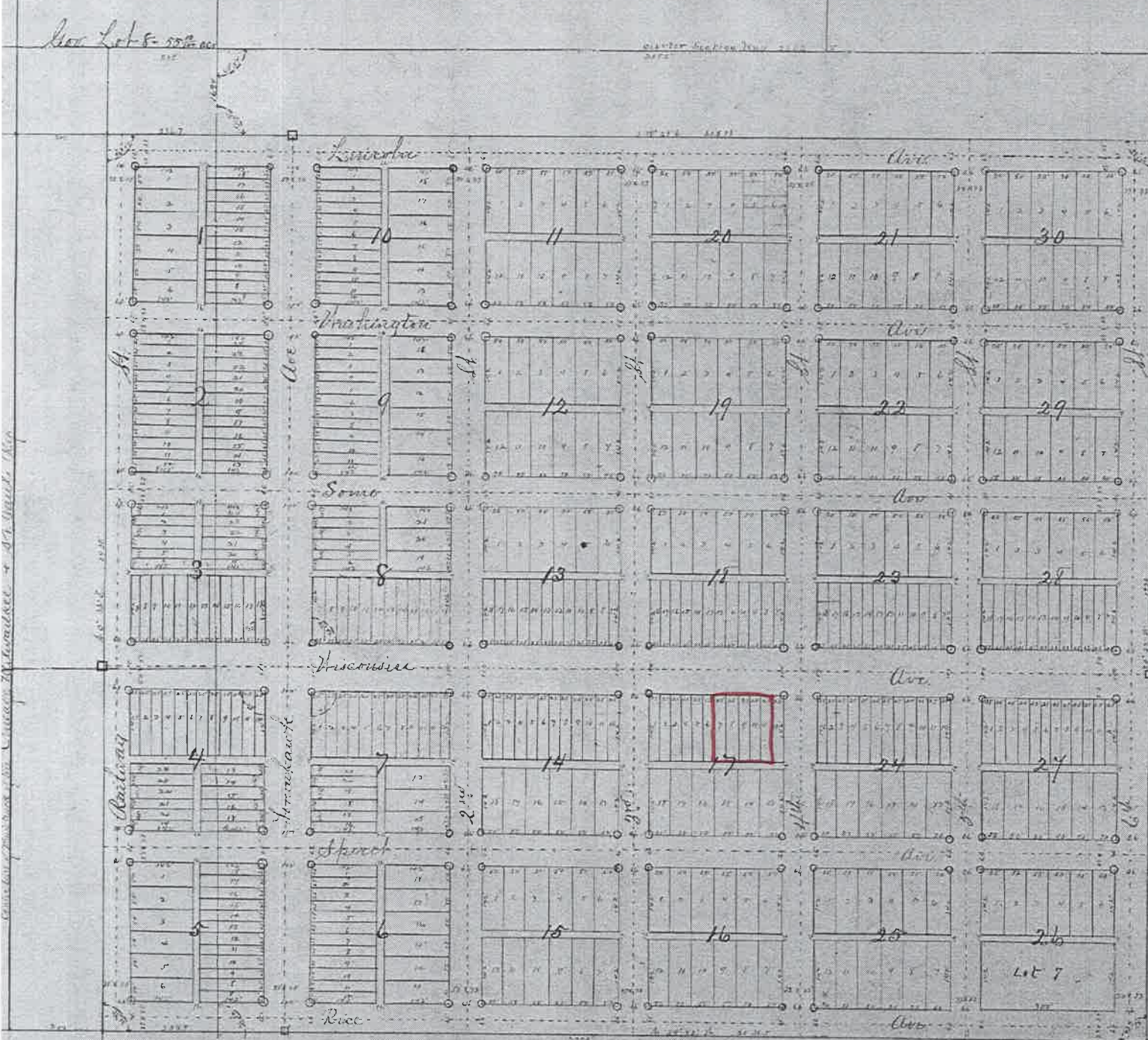
For Order Discontinuing Alley Entire Blk 2 see Vol. 48-A-124 Jolene Callahan, Register of Deeds

For Resolutions to vacate a part of the alley in Block 3. see Vol. 273-C-1624 Warren Wisniewski, Reg. of Deeds

For Resolution to vacate a part of the alley in Block 3 see Vol. 574-R-37, Matten Schroeder, Register of Deeds

For Resolutions to vacate a part of the alley in Block 7 see 2 439-A-504 Tremont Waller, Register of Deeds

For Resolution see Volume 156 of Deeds on page 173 vacating and re-locating of alley situated on lot 1 & 2 of N. W. 1/4 of Sec. 17



See Vol. 531-A-559

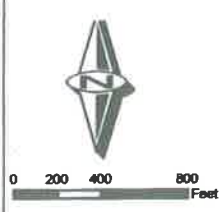
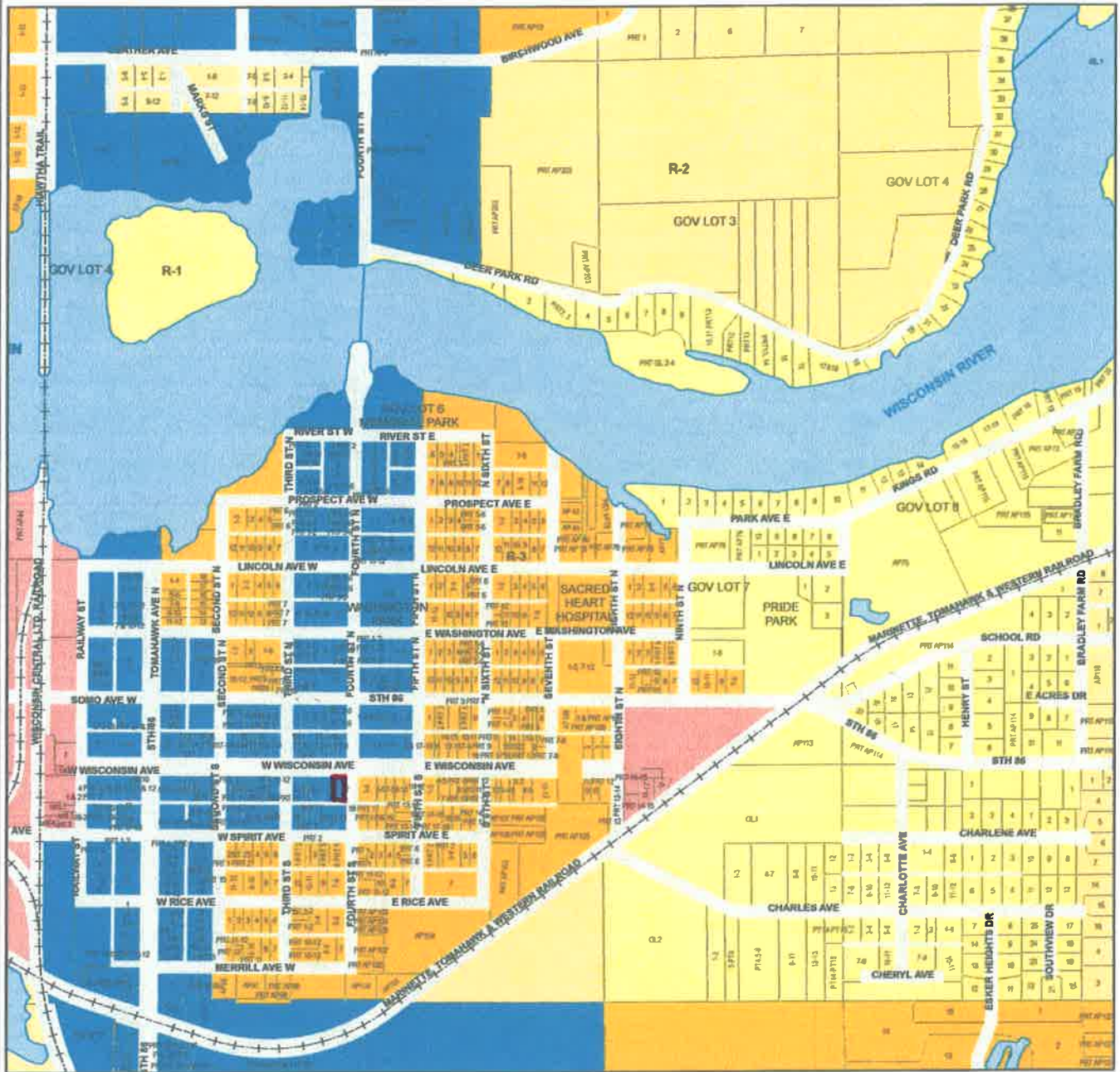
Center line of road shown on survey of Tomahawk & 47 Street Map

See Vol. 48-A-124

3271

6.3 Verification of Zoning

City of Tomahawk, WI Zoning Map - Section 34



Legend

Zoning

AGRE	AGRICULTURAL/RURAL ESTATE
B-1	BUSINESS
CL #2	GOVERNMENT LOT #2
GTS	GATEWAY TOURIST SERVICE
M-1	MANUFACTURING
R-1	SINGLE-FAMILY RESIDENTIAL
R-2	TWO-FAMILY RESIDENTIAL
R-3	MULTIPLE-FAMILY RESIDENTIAL



G.4 Signed Statement

WDNR BRRS Case #: 03-35-554426

WDNR Site Name: Luedtke Property

Geographic Information System (GIS) Registry of Closed Remediation Sites

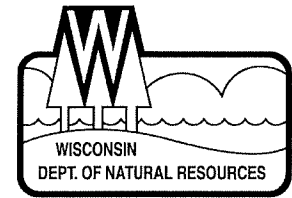
In compliance with the revisions to the NR 700 rule series requiring certain closed sites to be listed on the Geographic Information System (GIS) Registry of Closed Remediation Sites (Registry) effective Nov., 2001, I have provided the following information.

To the best of my knowledge the legal descriptions provided and attached to this statement are complete and accurate.

Responsible Party:

Todd Luedtke Owner
(print name/title)

Todd Luedtke 7/20/19
(signature) (date)



June 24, 2020

MR JAMES BILLEK
W7181 CLOVER LN
PHILLIPS WI 54555

SUBJECT: Continuing Obligations and Property Owner Requirements
for 17 West Wisconsin Avenue, Tomahawk
Parcel Identification Number 28635063430171
Final Case Closure for Luedtke Property
11 West Wisconsin Avenue, Tomahawk Wisconsin
DNR BRRTS Activity #03-35-554426

Dear Mr. Billek:

The purpose of this letter is to notify you that certain continuing obligations apply to the property at 17 West Wisconsin Avenue, Parcel Identification Number 28635063430171 (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 11 West Wisconsin Avenue, Tomahawk, 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 Wis. Stat. § 292.12, and Wis. Admin. Code ch. NR 700, 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.

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 (BOTW). This database is found at dnr.wi.gov and search "WRRD". 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, which shows environmental cleanup sites, including those closed with residual contamination and continuing obligations.

The Department of Natural Resources (DNR) reviewed and approved the case closure request regarding the petroleum and lead contamination in soil and groundwater at this site, based on the information submitted by METCO. 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 Todd Luedtke, dated June 24, 2020. However, only the continuing obligations for soil contamination applies to your Property.

Residual Soil Contamination (Wis. Admin. Code ch. NR 718, chs. NR 500 to 536, or Wis. Stat. ch. 289) Soil contamination remains in the north central area of the property around the perimeters of the former underground storage tank system and in the right-of-way of West Wisconsin Avenue, as indicated on the attached Figure B.2.b Residual Soil Contamination, prepared by METCO and dated January 18, 2017. If soil in the specific locations described above is excavated in the future, the property owner 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 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 Wis. Admin. Code ch. NR 718, with prior DNR approval. This continuing obligation also applies to the owners of 17 West Wisconsin Avenue (PIN #28635063430171), and the rights-of-way holders for West Wisconsin Avenue.

In addition, all current and future owners and occupants of the property need to be aware that excavation of the contaminated soil may pose an inhalation or other direct contact hazard. As a result, special precautions may need to be taken to prevent a direct contact health threat to humans

Due to the residual lead and petroleum 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 (BOTW), at dnr.wi.gov and search "WRRD". If you intend to construct or reconstruct a well on the Property, you will need to get department approval in accordance with Wis. Admin. Code § NR 812.09 (4) (w). 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 online at dnr.wi.gov and search "3300-254". If at some time, all these continuing obligations are fulfilled, and the remaining contamination is either removed or meets applicable standards, you may request an update to the database regarding the Property.

Property Owner Responsibilities

The owner (you and any subsequent property owner) of this Property is responsible for compliance with these continuing obligations, pursuant to Wis. Stat. § 292.12. 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 § NR 727.05. For residential property transactions, you are required to make disclosures under Wis. Stat. § 709.02. 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 Wis. Admin. Code § NR 727.05.

Please be aware that failure to comply with the continuing obligations may result in enforcement action by the DNR. The DNR intends to conduct inspections in the future to ensure that the conditions included in this letter, including compliance with referenced maintenance plans, 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 owner has an agreement fails to adequately comply with the appropriate continuing obligations, the DNR 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 DNR to review for as long as the DNR 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. Send all written notifications in accordance with the above requirements to:

Department of Natural Resources
Attn: Remediation and Redevelopment Program Environmental Program Associate
107 Sutliff Avenue
Rhinelander, Wisconsin 54501

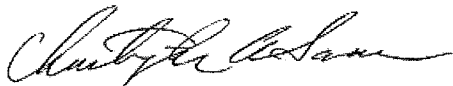
The enclosed DNR fact sheet, RR-819, "Continuing Obligations for Environmental Protection" helps explain a property owner's responsibility for continuing obligations on their property. This fact sheet should have been sent to you when you received a notification letter before the closure request was submitted to the DNR. You may obtain a copy at dnr.wi.gov and search "RR-819".

Under Wis. Stat. § 292.13, 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 Wis. Stat. § 292.13, does not exempt the property owner from the responsibility to maintain a continuing obligation placed on the property in accordance with Wis. Stat. § 292.12. 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 the 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 DNR appreciates your efforts. If you have any questions regarding this closure decision or anything outlined in this letter, please contact Aaron Zielsdorf at (715) 623-4190 ext. 3109, or at Aaron.Zielsdorf@Wisconsin.gov. You can also contact me at (715) 685-2920 or by email at Christopher.Saari@Wisconsin.gov.

Sincerely,



Christopher A. Saari
Northern Region Team Supervisor
Remediation and Redevelopment Program

Enclosure: Continuing Obligations for Environmental Protection, DNR Publication RR-819

Attachments:

- Final Case Closure with Continuing Obligations letter, DNR, June 24, 2020
- Figure B.2.b Residual Soil Contamination, METCO, January 18, 2017

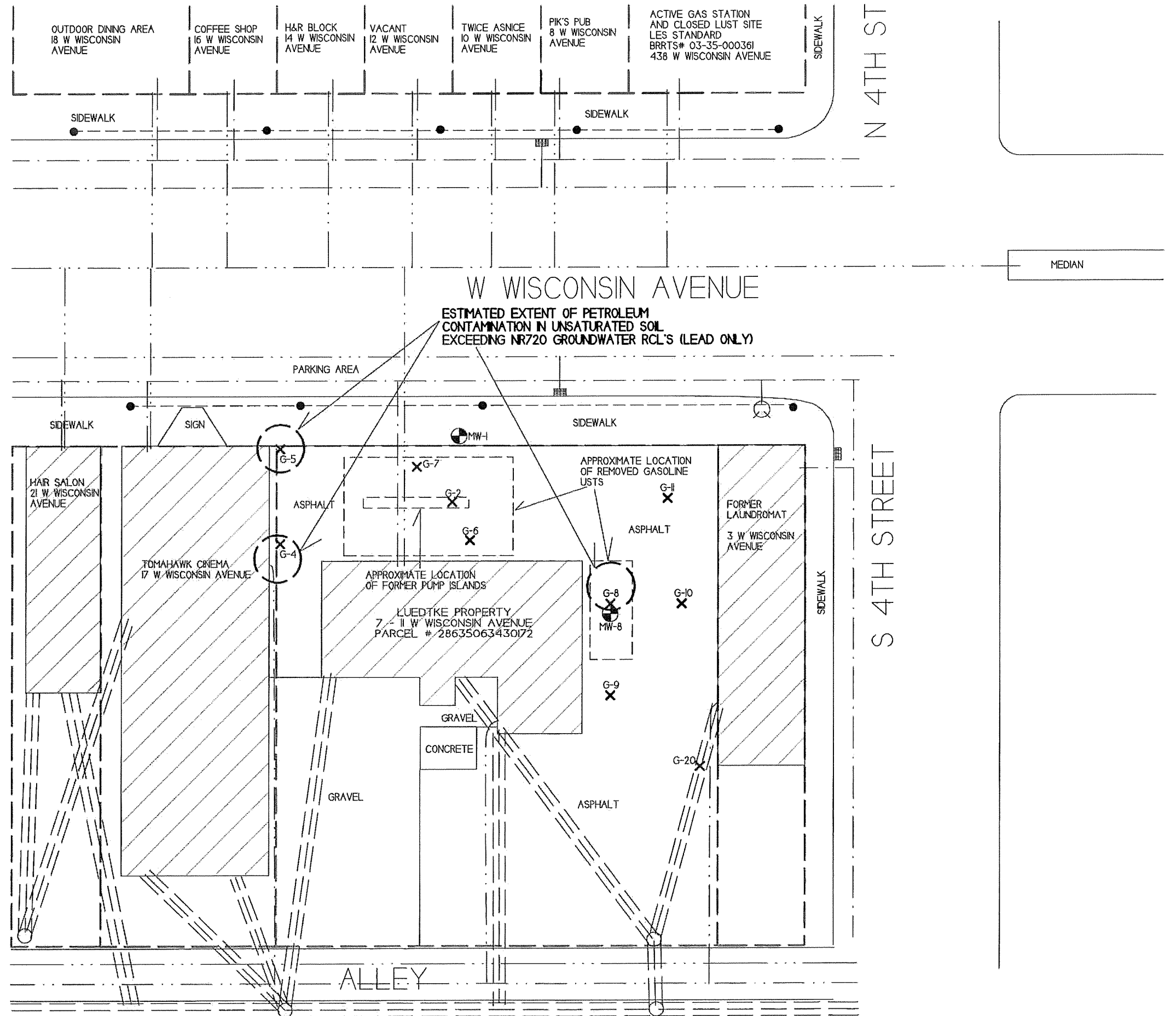
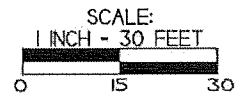
cc: Todd Luedtke
Ron Anderson – METCO (via email)
Aaron Zielsdorf – DNR Antigo (via email)

B.2.5 RESIDUAL SOIL CONTAMINATION LUEDTKE PROPERTY	
 <small>702 Gilbert St., Suite 2 La Crosse, WI 54601 Tel: (608) 781-8879 Fax: (608) 781-6953</small>	TOMAHAWK, WISCONSIN <small>DRAWN BY: ED DATE: 04/8/2007</small>

NOTE: INFORMATION BASED ON AVAILABLE DATA ACTUAL CONDITIONS MAY DIFFER

- ⊕ - FORMER MONITORING WELL LOCATION - LES STANDARD
- ⊗ - MONITORING WELL LOCATION - METCO
- ✕ - SOIL BORING LOCATION
- ▣ - STORM DRAIN
- ⊙ - FIRE HYDRANT
- - LIGHT POLE

- - PROPERTY BOUNDARY
- - - - - SANITARY SEWER LINE
- - - - - STORM SEWER LINE
- — — — WATER LINE
- - - - - GAS LINE
- - - - - BURIED ELECTRIC LINE
- ≡ ≡ ≡ ≡ ≡ - OVERHEAD ELECTRIC





June 24, 2020

MR DANIEL OSERO
PO BOX 343
TOMAHAWK WI 54487

SUBJECT: Notice of Completion of Environmental Work at the Luedtke Property
11 West Wisconsin Avenue, Tomahawk, Wisconsin
BRRTS Activity #03-35-554426

Dear Mr. Osero:

The Department of Natural Resources (DNR) recently approved the completion of the environmental work conducted at the Luedtke Property site. This letter describes how that approval affects your property; you are not required to take any action.

State law directs parties responsible for environmental contamination to take actions to restore the environment and minimize harmful effects. The law allows some contamination to remain in soil and groundwater if it does not pose a threat to public health, safety, welfare or to the environment.

On June 10, 2019, you received information from METCO about the contamination at the Luedtke Property. Contaminants remain in groundwater beneath your property. Over time, this contamination will clean up on its own. You are not responsible for cleaning up the contamination that has migrated beneath your property (Wis. Stat. § 292.13).

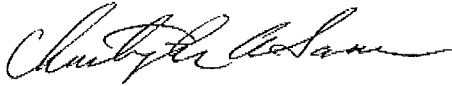
Please note that your drinking water is not affected by the contamination. Your drinking water is provided by the municipal water supply system, which is routinely tested to ensure the water meets federal and state drinking water standards.

If you construct or reconstruct a well on your property in the future, prior approval is required by Wis. Admin. Code ch. NR 812, to help ensure a safe well (use DNR form 3300-254 located at dnr.wi.gov and search "3300-254"). Local ordinances may also apply.

Additional information about this case is available in the DNR's Bureau for Remediation and Redevelopment Tracking System (BRRTS) on the Web (BOTW) at dnr.wi.gov and search "BOTW". Enter 03-35-554426 in the **activity number** field in the initial screen, then click on **search**. Scroll down and click on the **CO Packet** link for information about the completion of the environmental work.

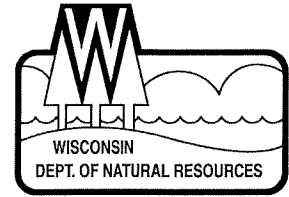
If you cannot access the BOTW website, or have additional concerns or questions regarding this case, you may contact Aaron Zielsdorf, the DNR project manager, at (715) 623-4190 ext. 3109, or at Aaron.Zielsdorf@Wisconsin.gov. You can also contact me at (715) 685-2920 or by email at Christopher.Saari@Wisconsin.gov.

Sincerely,

A handwritten signature in cursive script, appearing to read "Christopher A. Saari".

Christopher A. Saari
Northern Region Team Supervisor
Remediation and Redevelopment Program

cc: Todd Luedtke
Ron Anderson – METCO (via email)
Aaron Zielsdorf – DNR Antigo (via email)



June 24, 2020

CITY OF TOMAHAWK
ATTN: AMANDA BARTZ
PO BOX 469
TOMAHAWK WI 54487

SUBJECT: Notice of Closure Approval with Continuing Obligations
for Rights-of-Way Holders for West Wisconsin Avenue
Final Case Closure for Luedtke Property
11 West Wisconsin Avenue, Tomahawk, Wisconsin
DNR BRRTS Activity #03-35-554426

Dear Ms. Bartz:

The Department of Natural Resources (DNR) recently approved the completion of environmental work done at the Luedtke Property site. This letter describes how that approval applies to the right-of-way (ROW) at 11 West Wisconsin Avenue. As the right-of-way holder, you are responsible for complying with these continuing obligations for any work you conduct in the right-of-way.

State law directs parties responsible for environmental contamination to take actions to restore the environment and minimize harmful effects. The law allows some contamination to remain in soil and groundwater if it does not pose a threat to public health, safety, welfare or to the environment.

On June 10, 2019, you received information from Jason Powell of METCO, on behalf of Todd Luedtke, about the petroleum contamination in the ROW from the Luedtke Property, located at 11 West Wisconsin Avenue, and about the continuing obligations. Continuing obligations are meant to limit exposure to any remaining contamination.

Applicable Continuing Obligations

The continuing obligations that apply to this right-of-way are described below, and are consistent with Wis. Stat. § 292.12, and Wis. Admin. Code § NR 700 series.

Residual Groundwater Contamination (Wis. Admin. Code chs. NR 140, NR 812)

Groundwater contamination greater than enforcement standards is present both on this contaminated property and off this contaminated property, as shown on the attached Figure B.3.b Groundwater Isoconcentration (12/10/18), prepared by METCO and dated January 18, 2017. If you intend to construct a new well, or reconstruct an existing well, you'll need prior DNR approval. This continuing obligation also applies to the owners of 3 West Wisconsin Avenue (PIN #28635063430173), and the rights-of-way holders for West Wisconsin Avenue.

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

Soil contamination remains in the north central area of the property, around the perimeter of the former underground storage tank system and in the right-of-way of West Wisconsin Avenue, as indicated on the attached Figure B.2.b Residual Soil Contamination, prepared by METCO and dated January 18, 2017. If soil in the

specific locations described above is excavated in the future, the property owner 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 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 Wis. Admin. Code ch. NR 718, with prior DNR approval. This continuing obligation also applies to the owners of 17 West Wisconsin Avenue (PIN #28635063430171), and the rights-of-way holders for West Wisconsin Avenue.

In addition, all current and future owners and occupants of the property 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.

Additional Information

Additional information about this case is available at the DNR's Bureau for Remediation and Redevelopment Tracking System (BRRTS) on the Web (BOTW) at dnr.wi.gov and search "BOTW". Enter 03-35-554426 in the **Activity Number** field in the initial screen, then click on **Search**. Scroll down and click on the **CO Packet** link for information about the completion of the environmental work. The site may also be seen on the map view, RR Sites Map. RR Sites Map can be found online at dnr.wi.gov and search "WRRD".

If you have any questions regarding this closure decision or anything outlined in this letter, please contact Aaron Zielsdorf at (715) 623-4190 ext. 3109, or at Aaron.Zielsdorf@Wisconsin.gov. You can also contact me at (715) 685-2920 or by email at Christopher.Saari@Wisconsin.gov.

Sincerely,



Christopher A. Saari
Northern Region Team Supervisor
Remediation and Redevelopment Program


Enclosure: Continuing Obligations for Environmental Protection, DNR Publication RR-819

Attachments:

- Final Case Closure with Continuing Obligations letter, DNR, June 24, 2020
- Figure B.3.b Groundwater Isoconcentration (12/10/18), METCO, January 18, 2017
- Figure B.2.b Residual Soil Contamination, METCO, January 18, 2017

cc: Todd Luedtke
Ron Anderson – METCO (via email)
Aaron Zielsdorf – DNR Antigo (via email)

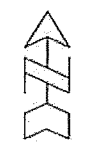
**B.2.b RESIDUAL
SOIL CONTAMINATION
LUEDTKE PROPERTY**



202 Gillette St. Suite 3
La Crosse, WI 54601
Tel: (608) 781-8970
Fax: (608) 781-9553

**TOMAHAWK,
WISCONSIN**

DRAWN BY: ED
DATE: 06/2007



NOTE: INFORMATION BASED ON AVAILABLE
DATA ACTUAL CONDITIONS MAY DIFFER

⊕ - FORMER MONITORING WELL LOCATION - LES STANDARD

⊙ - MONITORING WELL LOCATION - METCO

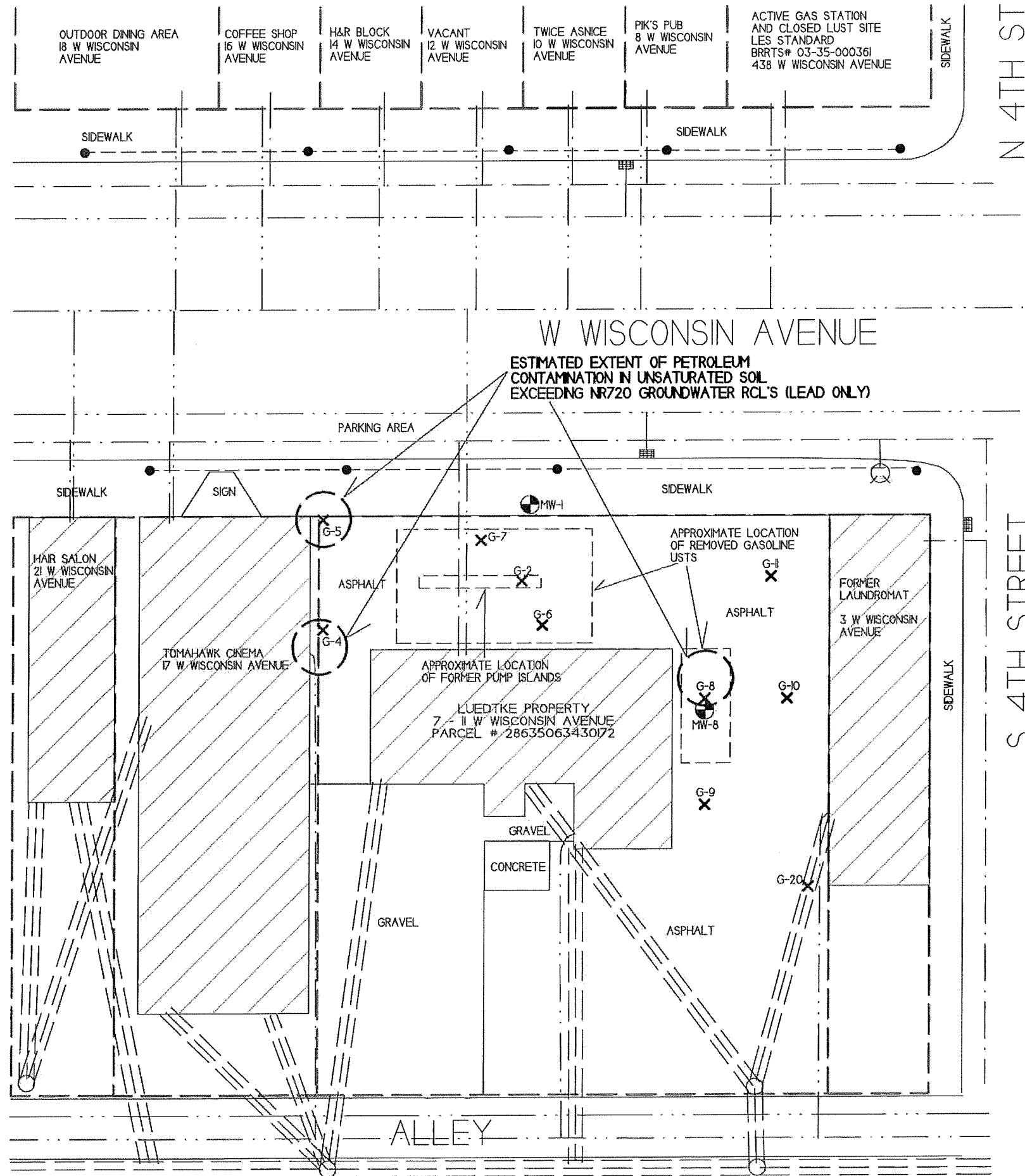
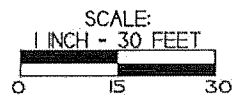
✕ - SOIL BORING LOCATION

▨ - STORM DRAIN

⊙ - FIRE HYDRANT

● - LIGHT POLE

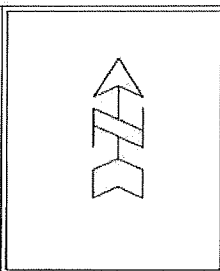
- - - - - PROPERTY BOUNDARY
- - - - - SANITARY SEWER LINE
- - - - - STORM SEWER LINE
- - - - - WATER LINE
- - - - - GAS LINE
- - - - - BURIED ELECTRIC LINE
- ≡ ≡ ≡ ≡ ≡ OVERHEAD ELECTRIC



B.3.b GROUNDWATER
ISOCONCENTRATION (12/10/18)
LUEDTKE PROPERTY

METCO
709 Gillette St. Suite 3
La Crosse, WI 54603
Tel: (608) 781-3879
Fax: (608) 781-8233

TOMAHAWK, WISCONSIN
DRAWN BY: ED
DATE: 04/18/2017



NOTE: INFORMATION BASED ON AVAILABLE
DATA ACTUAL CONDITIONS MAY DIFFER

⊕ - FORMER MONITORING WELL LOCATION - LES STANDARD

⊙ - MONITORING WELL LOCATION - METCO

✕ - SOIL BORING LOCATION

☒ - STORM DRAIN

⊖ - FIRE HYDRANT

● - LIGHT POLE

— — — — — - PROPERTY BOUNDARY

- - - - - - - - - - - SANITARY SEWER LINE

— — — — — - STORM SEWER LINE

- - - - - - - - - - - WATER LINE

- - - - - - - - - - - GAS LINE

- - - - - - - - - - - BURIED ELECTRIC LINE

— — — — — - OVERHEAD ELECTRIC

