



May 15, 2018

City of Menasha
Attn: Mr. Sam Schroeder
140 Main Street
Menasha WI 54902

KEEP THIS DOCUMENT WITH YOUR PROPERTY RECORDS

SUBJECT: Final Case Closure with Continuing Obligations
Realty Opus Property, 867 Valley Rd, Menasha WI
DNR BRRTS Activity #: 02-71-555288

Dear Mr. Schroeder:

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

This final closure decision is based on the correspondence and data provided, and is issued under chs. NR 726 and 727, Wis. Adm. Code. The Northeast Region Closure Committee reviewed the request for closure on February 15, 2018. The DNR Closure Committee reviewed this environmental remediation case for compliance with state laws and standards to maintain consistency in the closure of these cases.

The site is had been utilized for various industrial manufacturing uses since at least 1945. A case was created in 2010 after chlorinated volatile organic compounds (CVOCs) were identified in groundwater during a site investigation. Additional site investigation work was performed to define the degree and extent of soil and groundwater contamination. Chlorinated solvent and volatile organic compound (VOC) contamination was identified in soil and groundwater. The contamination is believed to be related to historical paint and solvent use at the site. Remedial action consisted of groundwater monitoring and site redevelopment.

The conditions of closure and continuing obligations required were based on the property being used for industrial and 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 ch. NR 140, Wis. Adm. Code enforcement standards.

- Residual soil contamination exists that must be properly managed should it be excavated or removed.
- Pavement must be maintained over contaminated soil and the DNR must be notified and approve any changes to this barrier.
- Remaining contamination could result in vapor intrusion if future construction activities occur. Future construction includes expansion or partial removal of current buildings as well as construction of new buildings. Vapor control technologies will be required for occupied buildings, unless the property owner assesses the potential for vapor intrusion, and the DNR agrees that vapor control technologies are not needed.

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

GIS Registry

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

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

All site information is also on file at the Northeast Regional DNR office, at 2984 Shawano Ave, Green Bay WI. This letter and information that was submitted with your closure request application, including any maintenance plan and maps, can be found as a Portable Document Format (PDF) in BRRTS on the Web.

Prohibited Activities

Certain activities are prohibited at closed sites because maintenance of a barrier is intended to prevent contact with any remaining contamination. When a barrier is required, the condition of closure requires notification of the DNR before making a change, in order to determine if further action is needed to maintain the protectiveness of the remedy employed. The following activities are prohibited on any portion of the property where pavement is required, as shown on the attached map *Figure D.2, Surface Barrier Inspection Area, April 27, 2018*, unless prior written approval has been obtained from the DNR:

- removal of the existing barrier or cover;
- replacement with another barrier or cover;
- excavating or grading of the land surface;
- filling on covered or paved areas;
- plowing for agricultural cultivation;
- construction or placement of a building or other structure; or
- changing the use or occupancy of the property to a residential exposure setting, which may include certain uses, such as single or multiple family residences, a school, day care, senior center, hospital, or similar residential exposure settings.

Closure Conditions

Compliance with the requirements of this letter is a responsibility to you and any subsequent property owners must adhere. DNR staff will conduct periodic prearranged inspections to ensure that the conditions included in this letter and the attached maintenance plan are met. If these requirements are not followed, the DNR may take enforcement action under s. 292.11, Wis. Stats. to ensure compliance with the specified requirements, limitations or other conditions related to the property.

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

Department of Natural Resources
Attn: Remediation and Redevelopment Program Environmental Program Associate
2984 Shawano Ave.
Green Bay WI 54313-6727

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

Groundwater contamination greater than enforcement standards is present on this contaminated property, as shown on the attached map *Figure B.3.b Groundwater Isoconcentration Map, April 27, 2018*. If you intend to construct a new well, or reconstruct an existing well, you'll need prior DNR approval.

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

Soil contamination remains as indicated on the attached map *Figure B.2.a Soil Sample Analytical Results, April 27, 2018*. If soil in the specific locations described above is excavated in the future, the property owner or right-of-way holder at the time of excavation must sample and analyze the excavated soil to determine if contamination remains. If sampling confirms that contamination is present, the property owner at the time of excavation will need to determine whether the material is considered solid or hazardous waste and ensure that any storage, treatment or disposal is in compliance with applicable standards and rules. Contaminated soil may be managed in accordance with ch. NR 718, Wis. Adm. Code, with prior DNR approval.

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

Cover or Barrier (s. 292.12 (2) (a), Wis. Stats., s. NR 726.15, s. NR 727.07 Wis. Adm. Code)

The pavement and building foundation that exists in the location shown on the attached map *Figure D.2 Surface Barrier Inspection Areal, April 27, 2018* shall be maintained in compliance with the attached maintenance plan in order to minimize the infiltration of water and prevent additional groundwater contamination that would violate the groundwater quality standards in ch. NR 140, Wis. Adm. Code, and to prevent direct contact with residual soil contamination that might otherwise pose a threat to human health.

The cover approved for this closure was designed to be protective for a commercial or industrial use setting. Before using the property for residential purposes, you must notify the DNR at least 45 days before taking an action, to determine if additional response actions are warranted.

A request may be made to modify or replace a cover or barrier. Before removing or replacing the cover, you must notify the DNR at least 45 days before taking an action. The replacement or modified cover or barrier must be protective of the revised use of the property, and must be approved in writing

by the DNR prior to implementation. A cover or barrier for industrial land uses, or certain types of commercial land uses may not be protective if the use of the property were to change such that a residential exposure would apply. This may include, but is not limited to single or multiple family residences, a school, day care, senior center, hospital or similar settings. In addition, a cover or barrier for multi-family residential housing use may not be appropriate for use at a single-family residence.

The attached maintenance plan and inspection log (DNR form 4400-305) are to be kept up-to-date and on-site. Inspections shall be conducted annually, in accordance with the attached maintenance plan. Submit the inspection log to the DNR only upon request.

Vapor Mitigation or Evaluation (s. 292.12 (2), Wis. Stats., s. NR 726.15, s. NR 727.07, Wis. Adm. Code)

Vapor intrusion is the movement of vapors coming from volatile chemicals in the soil or groundwater, into buildings where people may breathe air contaminated by the vapors. Vapor mitigation systems are used to interrupt the pathway, thereby reducing or preventing vapors from moving into the building.

Future Concern: Chlorinated VOC's remain in soil and groundwater as shown on the attached maps *Figure B.3.b Groundwater Isoconcentration Map, April 27, 2018* and *Figure B.2.a Soil Sample Analytical Results, April 27, 2018*, at levels that may be of concern for vapor intrusion in the future, depending on construction and occupancy of a building. Current site buildings are unoccupied self-storage warehouses. Therefore, before a building is constructed and/or an existing building is modified, the property owner must notify the DNR at least 45 days before the change. Vapor control technologies are required for construction of occupied buildings unless the property owner assesses the vapor pathway and DNR agrees that vapor control technologies are not needed.

Other Closure Information

General Wastewater Permits for Construction Related Dewatering Activities

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

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

In Closing

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

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

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Realty Opus Property BRRTS#02-71-555288

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- 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 Kevin McKnight at 920-424-7890, or at kevin.mcknight@wisconsin.gov.

Sincerely,



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

Attachments:

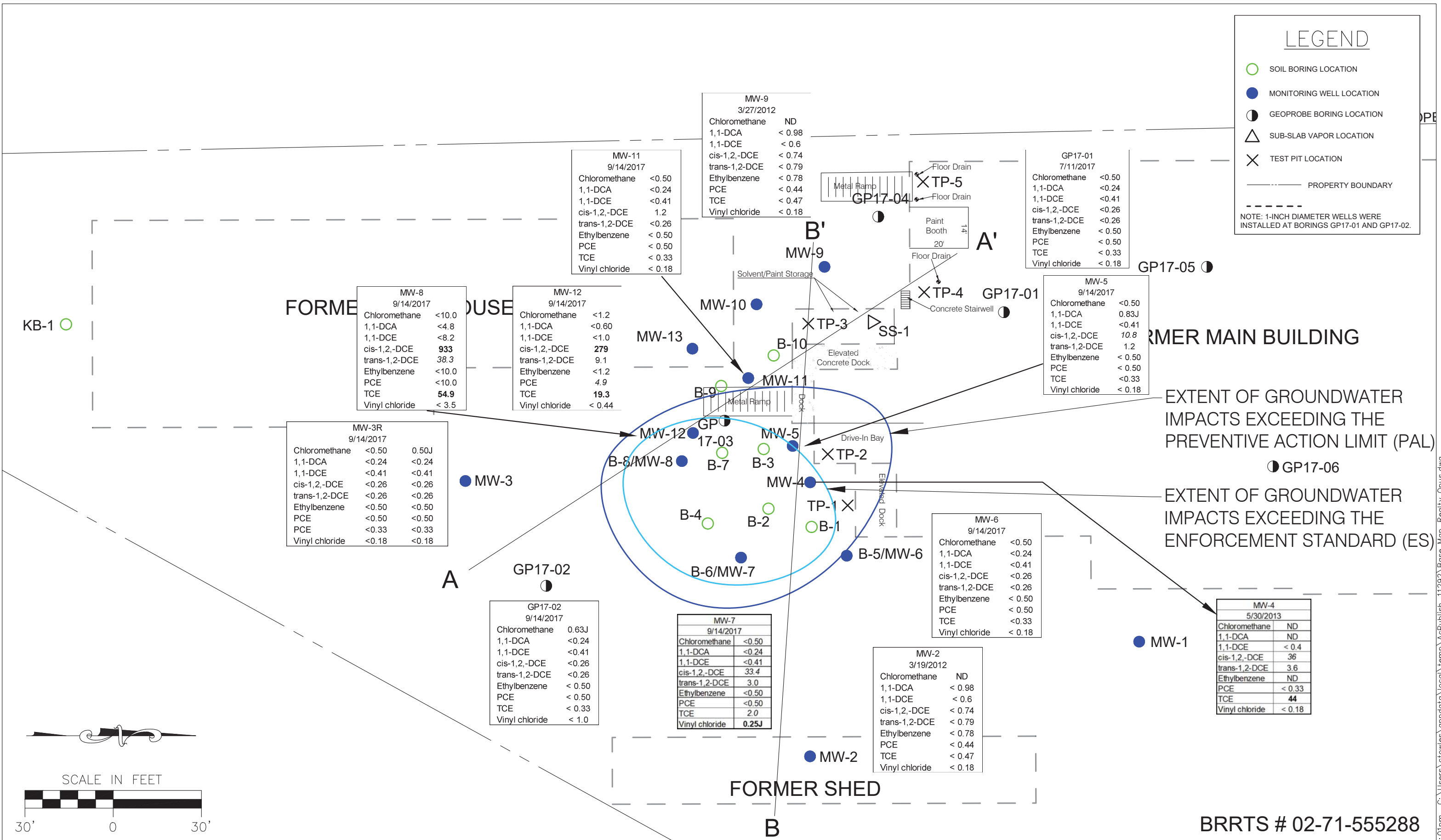
- Figure B.3.b Groundwater Isoconcentration Map, April 27, 2018
- Figure B.2.a Soil Sample Analytical Results, April 27, 2018
- Figure D.2 Surface Barrier Inspection Areal, April 27, 2018
- Cover or Barrier Maintenance Plan, March 30, 2018
- Inspection Log DNR Form 4400-305 with pictures

cc: Key Engineering Group, kmclung@keyengineering.com

LEGEND

- SOIL BORING LOCATION
- MONITORING WELL LOCATION
- GEOPROBE BORING LOCATION
- △ SUB-SLAB VAPOR LOCATION
- X TEST PIT LOCATION
- PROPERTY BOUNDARY

NOTE: 1-INCH DIAMETER WELLS WERE INSTALLED AT BORINGS GP17-01 AND GP17-02.



EXTENT OF GROUNDWATER IMPACTS EXCEEDING THE PREVENTIVE ACTION LIMIT (PAL)

EXTENT OF GROUNDWATER IMPACTS EXCEEDING THE ENFORCEMENT STANDARD (ES)

FIGURE B.3.b
GROUNDWATER ISOCONCENTRATION MAP
REALTY OPUS, 867 W. VALLEY RD
MENASHA, WISCONSIN

BRRTS # 02-71-555288

DESIGNED BY KMJ	DATE 4/27/2018
DRAWN BY RLH	PROJECT SET: 1608-0053-0002
APPROVED BY KWW	SHEET NO.
CADFILE XREF LMAN	

KEY ENGINEERING GROUP LTD.
 735 NORTH WATER STREET, SUITE 510
 MILWAUKEE, WI 53202
 414.224.8300 (tel) - 414.224.8383 (fax)

C:\Users\ctowles\appdata\local\temp\AcPublish_11292\Bose Map_Realty Opus.dwg Apr 27, 2018 1:01pm

COVER or BARRIER MAINTENANCE PLAN

March 30, 2018

Property Located at:

867 Valley Road
Menasha, Wisconsin 54952

DNR BRRTS # 02-71-555288, FID # 471007130

LEGAL DESCRIPTION:

Lot One (1) Certified Survey Map No. 3878, filed in the Office of the Register of Deeds for Winnebago County, Wisconsin on December 11, 1997, I Volume 1 on Page 3878, as Document No. 991791, said Survey Map being part of the Northwest $\frac{1}{4}$ of the Southeast $\frac{1}{4}$ and part of the Northeast $\frac{1}{4}$ of the Southwest $\frac{1}{4}$ of Section 2, Township 20 North, Range 17 East, City of Menasha, Winnebago County, Wisconsin.

TAX /Parcel Identification Number 740-0753-00

Introduction

This document is the Maintenance Plan for an engineered barrier at the above-referenced property in accordance with the requirements of s. NR 724.13 (2), Wis. Adm. Code. The on-going maintenance activities for the property owner and all successors, relate to the existing engineered barrier which addresses or occupies the area over the contaminated soil.

More site-specific information about this property/site may be found in:

- The case file in the DNR Northeast Region office,
- At <http://dnr.wi.gov/topic/Brownfields/wrrd.html>, which includes:
 - BRRTS on the Web (DNR's internet based data base of contaminated sites) for the link to a PDF for site-specific information at the time of closure and on continuing obligations;
 - RR Sites Map for a map view of the site, and
- The DNR project manager for Winnebago County.

D.1. Descriptions:

(Form 4400-202, Attachment D, Part D1. – brief description of the type, depth and location of residual contamination, description of the system/cover/barrier to be maintained, and its location on the site, maintenance activities, and contact information.)

Description of Contamination

Soil contaminated by volatile organic compounds (VOCs) is located at a depth of less than 4 feet from a former manufacturing building. Currently there are eight storage buildings located on-site identified as buildings A through H. These buildings are identified starting with A from west to east and north to south with a total of three rows of buildings. The first row and most northern row consists of 4 buildings, the second row moving south has 3 buildings, and last most southern row has 1 building nearest the southern point of the property. The area of impacted soil lies beneath building F which is the center building of the second row (see Figure D.2). Groundwater contaminated by VOCs is located at a depth of less than 4 feet.

Description of the [Cover/Barrier] to be Maintained

The barrier consists of a concrete foundation slab and asphalt pavement. It is located on-site as shown on the attached Figure D.2.

Cover/Building/Slab/Barrier Purpose

The concrete foundation slab and asphalt pavement over the contaminated soil serve as a barrier to prevent direct human contact with residual soil contamination that might otherwise pose a threat to human health. The cover/barrier also acts as a partial infiltration barrier to minimize future soil-to-groundwater contamination migration that would violate the groundwater standards in ch. NR 140, Wisconsin Administrative Code. Based on the current use of the Industrial-zoned property, the barrier should function as intended unless disturbed.

Annual Inspection

The concrete and asphalt overlying the contaminated soil and as depicted in Figure D.2 will be inspected once a year, normally in the spring after all snow and ice is gone, for deterioration, cracks, and other potential problems that can cause additional infiltration into or exposure to underlying soils. The inspections will be performed by the property owner or their designated representative. The inspections will be performed to evaluate damage due to settling, exposure to the weather, wear from traffic, increasing age and other factors. Any area where soils have become or are likely to become exposed and where infiltration from the surface will not be effectively minimized will be documented.

A log of the inspections and any repairs will be maintained by the property owner and is included as D.4, Form 4400-305, Continuing Obligations Inspection and Maintenance Log. The log will include recommendations for necessary repair of any areas where underlying soils are exposed and where infiltration from the surface will not be effectively minimized. Once repairs are completed, they will be documented in the inspection log. A copy of the maintenance plan and inspection log will be kept at the site; or, if there is no acceptable place (for example, no building is present) to keep it at the site, at the address of the property owner and available for submittal or inspection by Wisconsin Department of Natural Resources (WDNR) representatives upon their request.

[Note: The DNR may, in some instances, require in the case closure letter that the inspection log be submitted at least annually after every inspection. If the case closure letter requires that, then add the following sentence to the paragraph above: A copy of the inspection log must be submitted electronically to the DNR after every inspection, at least annually.]

Maintenance Activities

(Form 4400-202, Attachment D, Part D1. – Description of Maintenance Actions required for maximizing effectiveness of the cover/barrier/engineered control, feature or other action for which maintenance is required.)

If problems are noted during the annual inspections or at any other time during the year, repairs will be scheduled as soon as practical. Repairs can include patching and filling or larger resurfacing or construction operations. In the event that necessary maintenance activities expose the underlying soil, the owner must inform maintenance workers of the direct contact exposure hazard and provide them with appropriate personal protection equipment (PPE). The owner must also sample any soil that is excavated from the site prior to disposal to ascertain if contamination remains. The soil must be treated, stored and disposed of by the owner in accordance with applicable local, state and federal law.

In the event the barrier overlying the contaminated soil is removed or replaced, the replacement barrier must be equally impervious. Any replacement barrier will be subject to the same maintenance and inspection guidelines as outlined in this Maintenance Plan unless indicated otherwise by the DNR or its successor.

The property owner, in order to maintain the integrity of the barrier, will maintain a copy of this Maintenance Plan at the site; or, if there is no acceptable place to keep it at the site (for example, no building is present), at the address of the property owner and make it available to all interested parties (i.e. on-site employees, contractors, future property owners, etc.) for viewing.

Prohibition of Activities and Notification of DNR Prior to Actions Affecting a Cover/Barrier

The following activities are prohibited on any portion of the property where the barrier is required as shown on the attached map, unless prior written approval has been obtained from the WDNR:

- 1) removal of the existing barrier;
- 2) replacement with another barrier;
- 3) excavating or grading of the land surface;
- 4) filling on capped or paved areas;
- 5) plowing for agricultural cultivation;
- 6) construction or placement of a building or other structure; or
- 7) changing the use or occupancy of the property to a residential exposure setting, which may include certain uses, such as single or multiple family residences, a school, day care, senior center, hospital, or similar residential exposure settings.

If removal, replacement or other changes to a cover, or a building which is acting as a cover, are considered, the property owner will contact WDNR at least 45 days before taking such an action, to determine whether further action may be necessary to protect human health, safety, or welfare or the environment, in accordance with s. NR 727.07, Wis. Adm. Code.

Amendment or Withdrawal of Maintenance Plan

This Maintenance Plan can be amended or withdrawn by the property owner and its successors with the written approval of DNR.

Contact Information

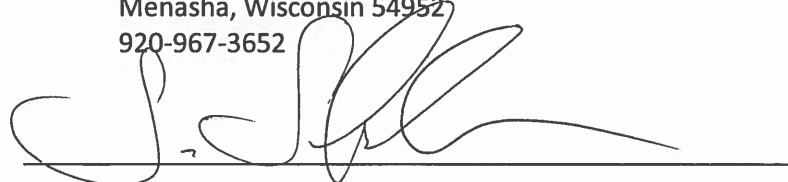
(Form 4400-202, Attachment D, Part 1.) Contact Information, including the name, address and phone number of the individual or facility who will be conducting the maintenance.)

March 2018

Site Owner: Samuel Schroeder

City of Menasha
100 Main Street
Menasha, Wisconsin 54952
920-967-3652

Signature:



Site Operator: Luke Bergstrom
Multistorage, LLC
1 Neenah Center, Suite 700
Neenah, Wisconsin 54956
920-585-0206

Signature: 

Consultant: Kurt McClung
KEY Engineering Group, Ltd.
735 North Water Street, Suite 510
Milwaukee, Wisconsin 53202
414 225-0592

DNR: Kevin McKnight
Oshkosh Service Center
625 E County Y, Suite 700
Oshkosh, Wisconsin 54901
920 424-7890

D.2 Location Map(s)

Include a location map which shows:

- (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 of Cover/Barrier

Include one or more photographs documenting the condition and extent of the cover/barrier/building/slab at the time of the closure request. Pertinent features must be visible and discernible. Include a title on each photograph, which identifies the site name and location of the feature, and the date on which the photograph was taken.

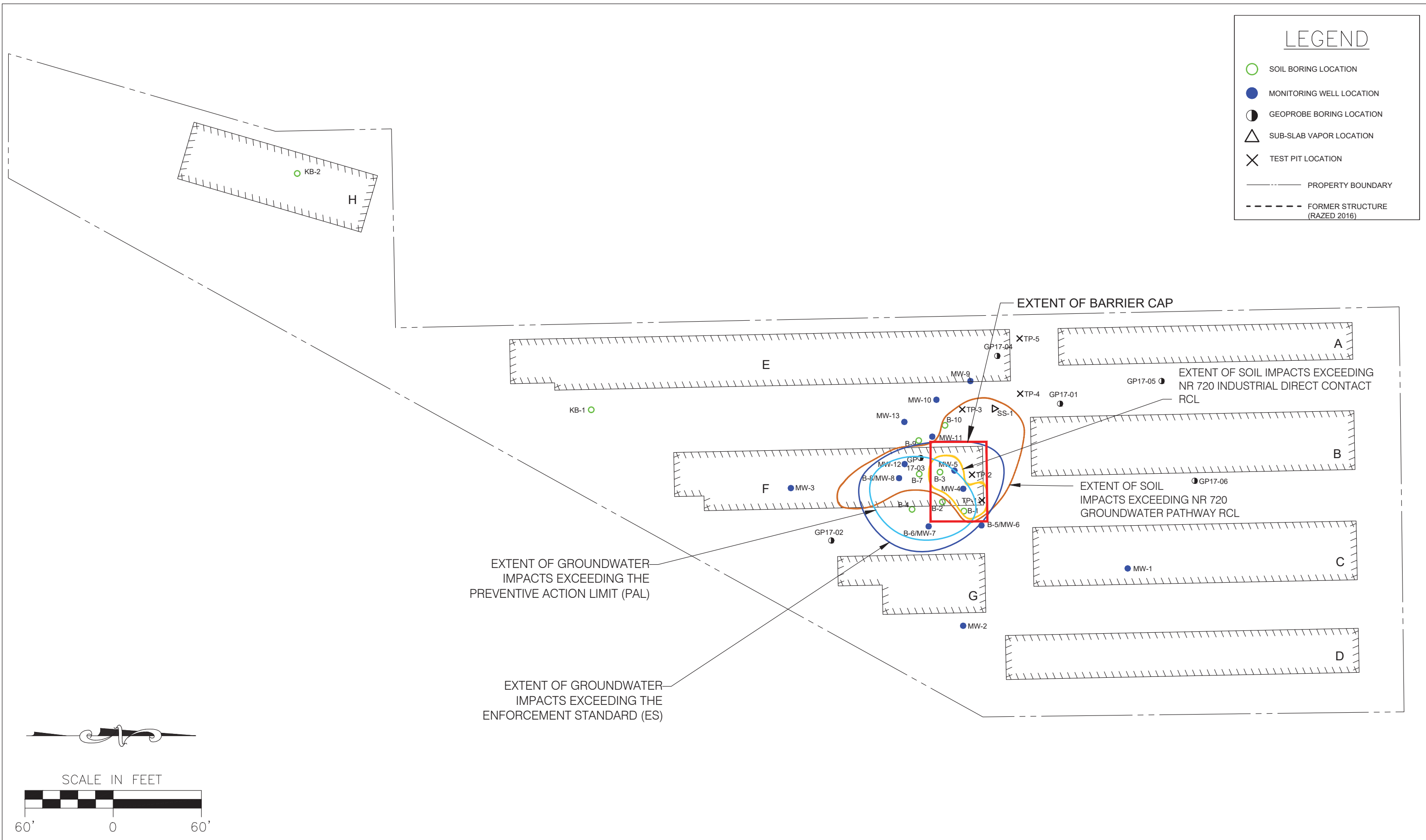
D.4 Continuing Obligations Inspection and Maintenance Log

Use DNR Fillable Form: Form 4400-305



LEGEND

- SOIL BORING LOCATION
- MONITORING WELL LOCATION
- GEOPROBE BORING LOCATION
- △ SUB-SLAB VAPOR LOCATION
- × TEST PIT LOCATION
- PROPERTY BOUNDARY
- - - FORMER STRUCTURE (RAZED 2016)



EXTENT OF GROUNDWATER IMPACTS EXCEEDING THE PREVENTIVE ACTION LIMIT (PAL)

EXTENT OF GROUNDWATER IMPACTS EXCEEDING THE ENFORCEMENT STANDARD (ES)

EXTENT OF BARRIER CAP

EXTENT OF SOIL IMPACTS EXCEEDING NR 720 INDUSTRIAL DIRECT CONTACT RCL

EXTENT OF SOIL IMPACTS EXCEEDING NR 720 GROUNDWATER PATHWAY RCL

FIGURE D.2
SURFACE BARRIER INSPECTION AREA
REALTY OPUS, 867 W. VALLEY RD
MENASHA, WISCONSIN

DESIGNED BY KMJ	DATE 4/27/2018
DRAWN BY RLH	PROJECT SET: 1608-0053-0002
APPROVED BY KWW	SHEET NO.
CADFILE XREF LMAN	

KEY ENGINEERING GROUP LTD.
 735 NORTH WATER STREET, SUITE 510
 MILWAUKEE, WI 53202
 414.224.8300 (tel) - 414.224.8383 (fax)



PHOTOGRAPH 1:

Surface Barrier, facing SW



PHOTOGRAPH 2:

Surface Barrier, facing S



PHOTOGRAPH 3:

Surface Barrier, facing SE

Directions: In accordance with s. NR 727.05 (1) (b) 3., Wis. Adm. Code, use of this form for documenting the inspections and maintenance of certain continuing obligations is required. 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.]. When using this form, identify the condition that is being inspected. See the closure approval letter for this site for requirements regarding the submittal of this form to the Department of Natural Resources. A copy of this inspection log is required to be maintained either on the property, or at a location specified in the closure approval letter. Do NOT delete previous inspection results. This form was developed to provide a continuous history of site inspection results. The Department of Natural Resources project manager is identified in the closure letter. The project manager may also be identified from the database, BRRTS on the Web, at <http://dnr.wi.gov/botw/SetUpBasicSearchForm.do>, by searching for the site using the BRRTS ID number, and then looking in the "Who" section.

Activity (Site) Name Realty Opus Property	BRRTS No. 02-71-555288
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Inspections are required to be conducted (see closure approval letter): <input checked="" type="radio"/> annually <input type="radio"/> semi-annually <input type="radio"/> other – specify _____	When submittal of this form is required, submit the form electronically to the DNR project manager. An electronic version of this filled out form, or a scanned version may be sent to the following email address (see closure approval letter): <p style="text-align: center;">Kevin.McKnight@wisconsin.gov</p>
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Inspection Date	Inspector Name	Item	Describe the condition of the item that is being inspected	Recommendations for repair or maintenance	Previous recommendations implemented?	Photographs taken and attached?
12/07/2017	Kurt McClung	<input type="checkbox"/> monitoring well <input checked="" type="checkbox"/> cover/barrier <input type="checkbox"/> vapor mitigation system <input type="checkbox"/> other:	Surface Cap	None	<input type="radio"/> Y <input type="radio"/> N	<input checked="" type="radio"/> Y <input type="radio"/> N
		<input type="checkbox"/> monitoring well <input type="checkbox"/> cover/barrier <input type="checkbox"/> vapor mitigation system <input type="checkbox"/> other:			<input type="radio"/> Y <input type="radio"/> N	<input type="radio"/> Y <input type="radio"/> N
		<input type="checkbox"/> monitoring well <input type="checkbox"/> cover/barrier <input type="checkbox"/> vapor mitigation system <input type="checkbox"/> other:			<input type="radio"/> Y <input type="radio"/> N	<input type="radio"/> Y <input type="radio"/> N
		<input type="checkbox"/> monitoring well <input type="checkbox"/> cover/barrier <input type="checkbox"/> vapor mitigation system <input type="checkbox"/> other:			<input type="radio"/> Y <input type="radio"/> N	<input type="radio"/> Y <input type="radio"/> N
		<input type="checkbox"/> monitoring well <input type="checkbox"/> cover/barrier <input type="checkbox"/> vapor mitigation system <input type="checkbox"/> other:			<input type="radio"/> Y <input type="radio"/> N	<input type="radio"/> Y <input type="radio"/> N
		<input type="checkbox"/> monitoring well <input type="checkbox"/> cover/barrier <input type="checkbox"/> vapor mitigation system <input type="checkbox"/> other:			<input type="radio"/> Y <input type="radio"/> N	<input type="radio"/> Y <input type="radio"/> N

{Click to Add/Edit Image}

Date added: 01/12/2018



Title: Facing SW

{Click to Add/Edit Image}

Date added: 01/12/2018



Title: Facing S

{Click to Add/Edit Image}

Date added: 01/12/2018



Title: Facing SE

BRRTS #: 02-71-555288

FID #: 471007130

SITE NAME: REALTY OPUS PROPERTY - VPLE

Associated VPLE Site

To view the Certificate of Completion (COC) for this site click on the link below:

BRRTS #

SITE NAME

06-71-578231

[REALTY OPUS PROPERTY - VPLE](#)

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.		
02-71-555288	06-71-578231		
Parcel ID No.	740-0753-00		
FID No.	WTM Coordinates		
471007130	X 644989	Y 419297	
BRRTS Activity (Site) Name	WTM Coordinates Represent:		
Realty Opus Property	<input checked="" type="checkbox"/> Source Area <input type="checkbox"/> Parcel Center		
Site Address	City	State	ZIP Code
867 Valley Road	Menasha	WI	54952
Acres Ready For Use	3.9		

Responsible Party (RP) Name			
Mr. Samuel Schroeder			
Company Name			
City of Menasha			
Mailing Address	City	State	ZIP Code
140 Main Street	Menasha	WI	54952
Phone Number	Email		
(920) 967-3652	sschroeder@ci.menasha.wi.us		

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

Environmental Consultant Name			
Kurt McClung			
Consulting Firm			
KEY Engineering Group, Ltd.			
Mailing Address	City	State	ZIP Code
735 North Water Street, Suite 510	Milwaukee	WI	53202
Phone Number	Email		
(414) 225-0592	kmcclung@keyengineering.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 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>650.00</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 3.9-acre subject site ("Site") is referenced by the street address of 867 W. Valley Road, Menasha, Wisconsin. The subject site is bordered by industrial properties to the north, east, and west, and a transportation right-of-way for State Highway 441 / U.S. Highway 10 to the south.

The Site is located at 44°14'11.7" North latitude, 88°26'04.2" West longitude. The Site is located within Section 02, Township 20N, Range 17E in the City of Menasha, Winnebago County, Wisconsin. The subject site was historically developed with three structures that were demolished by the City of Menasha in November and December 2016. The former structures included a 25,452 square-foot main manufacturing building at the north end of the property. The building included areas used as offices, manufacturing, a wood shop, finishing/painting, and loading docks for shipping/receiving. An 8,400 square-foot steel warehouse was located south of the main building, and a three-sided covered storage structure was located on the east side of the property. A dirt/gravel road ran north-south through the middle of the property.

The property has been redeveloped as a commercial self-storage facility. Approximately 7 single-story, slab-on-grade buildings are under construction at the site.

The subject site is identified by tax parcel number 704-0753-00. The City of Menasha proposes to sell the property for development. Unoccupied warehouse storage structures are currently under construction and the property zoning will remain as General Industrial according to Mr. Kevin Englebert of the City of Menasha.

B. Prior and current site usage: Specifically describe the current and historic occupancy and types of use.

The subject site was used as a metal manufacturing facility for the Kools Bros. Ornamental Iron Works and Manufacturing from approximately 1945 to 1984. Mechanical vegetable peelers and a variety of farm equipment were manufactured. Realty Opus, Inc. purchased the subject site in 1984 and leased the buildings to Kinetic Systems, Inc. who used the facility to assemble and distribute palletizing equipment from 1984 to 2000. Realty Opus subsequently leased the buildings to Urban Artifacts/Urban Evolutions from 2000 to 2013, who used the property for the collection and re-use of historic architectural items in new home furnishings. In 2016, the City of Menasha purchased the property for redevelopment and engaged KEY to complete the site investigation and assist the city in obtaining a certificate for the site.

During a review of City records, KEY identified several letters issued by the City between 1990 and 2004 to Realty Opus, Inc. regarding zoning code violations related to the storage and dismantling of abandoned automobiles and the use of the subject site as a junkyard. No evidence of a junkyard on the site was observed in any of the aerial photographs reviewed for the Phase I ESA. This suggests that these activities were limited to a small area of the site and is not considered a significant source of contamination.

C. Current zoning (e.g., industrial, commercial, residential) for the site and for neighboring properties, and how verified (Provide documentation in Attachment G).

The site is zoned as I2 - for General Industrial land use (City of Menasha Property Database).

D. Describe how and when site contamination was discovered.

In 2010, Urban Evolutions retained Badger Laboratories and Engineering, Inc. (Badger) to perform site investigation activities at the subject property. A water sample collected from a puddle near the loading dock in March 2010 indicated the presence of cis-1,2-dichloroethene (DCE), a chlorinated volatile organic compound (CVOC). Subsequently, a temporary groundwater well was installed near the location of the water sample. The groundwater sample collected from the temporary well revealed detections of tetrachloroethene (PCE), trichloroethylene (TCE), DCE, and trans 1,2 dichloroethene (trans-1,2-DCE).

This information was reported to the Wisconsin Department of Natural Resources (WDNR) on May 10, 2010. In a letter dated May 20, 2010, the WDNR notified Realty Opus, Inc., of its responsibility to define the degree and extent of the subsurface contamination. Realty Opus worked with Badger, as the environmental consultant for the subject site from 2010 to 2013.

E. Describe the type(s) and source(s) or suspected source(s) of contamination.

What is suspected to have been residual paints and solvents (including xylene's) leftover from painting and cleaning activities were potentially spilled on the ground near the end of the ramp at the south end of the main building. These repeated surface releases, spanning 30 to 40 years, are the apparent source of VOC contamination at the site.

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.
02-71-555288 Realty Opus Property
06-71-578231 Realty Opus Property - VPLE
- H. List BRRTS activity/site name(s) and number(s) for all properties immediately adjacent to (abutting) this source property.
None

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.
The soil on the site is mapped as Korobago silt loam. Korobago silt loam is poorly drained soil with moderate to low permeability, and are typically formed in a silty and loamy lacustrine environment.
- ii. Describe the composition, location and lateral extent, and depth of fill or waste deposits on the site.
Soils encountered in the borings advanced at the site generally consisted 0.5 to 1 foot of fine, silty gravel fill. Fill material consisting of a mix of dimensional stone screenings, cinders and crushed stone is found along the main north to south axis of the property on the east side of former main building and the former steel pole building south of the main building. This fill was used to maintain a drivable surface for trucks serving the site. This fill was used to form the parking area on the north side of the main building and on the east side of the driveway. Depth of fill varied from 5 inches to approximately 18 inches in depth across the site with the maximum depths of 5 feet found in the area of the loading dock on the south end of the main building, including the area beneath the floor of the main structure.
- iii. Describe the depth to bedrock, bedrock type, competency and whether or not it was encountered during the investigation.
The project site area is underlain by what is thought to be 40 to 100 feet of glacial till, overlying dolomite bedrock. Bedrock was not encountered during this investigation.
- 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).
Currently, the site is paved with asphalt with concrete slab-on-grade storage buildings over the entire area of impacted soil and groundwater.

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 generally occurs at depths of 1 to 5 feet bgs within the site monitoring wells.
- ii. Discuss groundwater flow direction(s), shallow and deep. Describe and explain flow variations, including fracture flow if present.
Apparent groundwater flow at the subject site generally follows the site's surface topography. Groundwater elevation data suggest a groundwater flow toward the south and east across the site.
- iii. Discuss groundwater flow characteristics: hydraulic conductivity, flow rate and permeability, or state why this information was not obtained.
The hydraulic conductivity of the subject site soils is inferred to be in the range of 1×10^{-6} centimeters per second. Hydraulic gradient was observed in the range of 0.0375 ft/ft. The effective porosity of the observed soil is inferred to be in the range of 0.40. The seepage velocity of groundwater is estimated at 9.4×10^{-8} cm/sec, or 0.09 ft/yr in a south-southwesterly direction.
- 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).
A search for the location of water supply wells located within 1,200 feet of the groundwater plume was completed using the Wisconsin Department of Agriculture, Trading, and Consumer Protection (DATCP) Well Constructor's Report database (DATCP 2016). The Village of Fox Crossing maintains a database of potable wells within its service area that remain in use, are abandoned, or are not in compliance with the local well ordinance which allows potable wells to remain for non-consumptive use. KEY reviewed the database provided by Fox River Crossing and identified three active potable wells within a 1,200-foot radius of the Site. The locations of the water supply wells are presented on the site location map (Figure B.1.a.).

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.
In 2010, Urban Evolutions retained Badger Laboratories and Engineering, Inc. (Badger) to perform site investigation

activities at the subject property. A water sample collected from a puddle near the loading dock in March 2010 indicated the presence of cis-1,2-DCE, a CVOC. Subsequently, a temporary groundwater well was installed near the location of the surface water sample. The groundwater sample collected from the temporary well revealed detections of PCE, TCE, DCE, and trans-1,2-DCE.

This information was reported to the Wisconsin Department of Natural Resources (WDNR) on May 10, 2010. In a letter dated May 20, 2010, the WDNR notified Realty Opus, Inc., of its responsibility to define the degree and extent of the subsurface contamination. Realty Opus worked with Badger, as the environmental consultant for the subject site from 2010 to 2013.

Badger conducted subsurface assessment activities, including monitoring well installation, in July 2010, February and April 2011, and March 2012. A total of 20 soil borings were advanced, with installation of monitoring wells (constructed in accordance with NR 141, Wisconsin Administrative Code) at 13 of the borings.

April 2010

A temporary groundwater monitoring well was installed near the location of the surface water sample. The result of the Temp Well groundwater sample revealed cis-1,2-DCE, trans-1,2-DCE, TCE, and PCE. DCE and PCE were detected above NR 140 Preventative Action Limits (NR 140 PAL). Following the completion of sampling and analysis, the temporary monitoring well was removed and the borehole was abandoned.

August 2010

Badger installed three groundwater monitoring wells (MW-1, MW-2, and MW-3). Soil and groundwater samples were collected and analyzed for VOCs. The laboratory results identified no detectable concentrations in groundwater or soil.

February 2011

Closer to the original location of the temporary monitoring well near the loading dock, Badger completed three soil borings (B-1, B-2, and B-3) and installed monitoring well MW-4. The three soil borings and monitoring well were all advanced to 15 feet below ground surface (bgs) and soil samples were collected for laboratory analysis of VOCs. The laboratory results indicated cis-1,2-DCE, trans-1,2-DCE, ethylbenzene, TCE, PCE, trimethylbenzenes, and xylenes were present. A groundwater sample from MW-4 was analyzed for VOCs which yielded detections of vinyl chloride, cis-1,2-DCE, TCE, and PCE were present above NR 140 Enforcement Standards (NR 140 ES).

April 2011

Badger completed seven soil borings (B-4 to B-10) and installed four monitoring wells (MW-5 to MW-8) to further define the extent of the release. Monitoring wells MW-6, MW-7, and MW-8 were constructed in soil borings B-5, B-6 and B-8, respectively. A separate soil boring was completed for construction of MW-5. Soil samples were collected for analysis from each boring, except for MW-5, which was located adjacent to B-3. The soil borings on the west side of the ramp (B-9 and B-10) were completed with a smaller, portable rig that could be manually moved around the end of the ramp. Soil samples were collected for laboratory analysis of VOCs. Soil samples B 7, B8, and B-10 were above WAC Chapter NR 720 non-industrial direct contact and groundwater pathway residual contaminant levels (NR 720 RCLs) for cis-1,2-DCE, TCE, and PCE.

May 2011

Badger collected groundwater samples from monitoring wells MW-5, MW-6, MW-7, and MW-8, and analyzed the samples for VOCs. The groundwater sample from MW-7 exceeded the NR 140 ES for cis-1,2-DCE and TCE, and MW-8 exceeded the NR 140 ES for cis-1,2-DCE, TCE, and vinyl chloride.

November 2011

Badger sampled all eight monitoring wells (MW-1 through MW-8) for VOCs. The results identified wells MW-4 and MW-8 exceeded NR 140 ES for cis-1,2-DCE, TCE, and PCE.

March 2012

Badger installed five additional wells (MW-9 through MW-13) to assess subsurface conditions south and west of the ramp located at the south end of the manufacturing building. Soil samples from these boreholes were collected and analyzed for VOCs. Groundwater samples were collected from all thirteen wells (MW-1 through MW-13) and analyzed for VOCs. The results identified cis-1,2-DCE and TCE in soil above the NR 720 RCL for non-industrial direct contact in MW-4. Groundwater analysis revealed NR 140 ES exceedances for cis-1,2-DCE, TCE, and PCE in MW-4 and MW-8.

February 2013

Badger collected groundwater samples from MW-4, MW-5, MW-7, MW-12, and MW-13 and analyzed the samples for VOCs. Groundwater sample analysis revealed NR140 ES exceedances for cis-1,2-DCE, TCE, and PCE in MW-4, MW-8, and MW-12.

May 2013

Badger collected groundwater samples from MW-3R, MW-4, MW-5, MW-7, MW-8, MW-12, and MW-13 and

analyzed the samples for VOCs. Groundwater analysis revealed NR 140 ES exceedances for cis-1,2-DCE, TCE, and PCE in MW-8 and MW-12, with only TCE exceeding NR 140 ES at MW-4.

KEY was able to locate the Badger soil data only, since neither our client nor KEY could locate the former Badger Labs groundwater data. KEY was informed by Badger that they no longer have the groundwater data, and believe that it was submitted in a Site Investigation Report that was received by the WDNR on February 27, 2012.

KEY was retained in 2015 by WOW Logistics, a potential buyer of the subject site. KEY was tasked to perform due diligence in the form of limited site investigation activities to support the completion of brownfields redevelopment grant applications.

To assess potential soil contamination related to surface runoff, KEY completed two soil borings (KB-1 and KB-2) on the southern portion of the property. The vicinity of KB-1 and KB-2 is the lowest elevation on the subject site and is a location of infiltration to groundwater. Two soil samples, one shallow from 2 to 4 feet bgs and one deeper from 10 to 12 feet bgs, were collected and analyzed for VOCs, polycyclic aromatic hydrocarbons (PAHs), and Resource Conservation Recovery Act (RCRA) metals. No VOCs or PAH were detected.

KEY also located MW-8, developed the well, and collected a groundwater sample, which was analyzed for VOCs, PAHs, and metals. Volatiles cis-1,2-DCE, TCE, and PCE exceeded NR 140 ES.

KEY collected a sub-slab vapor sample (SS-1) for VOCs analysis from the former paint/solvent storage room at the south end of the main building. No detections exceeded target sub-slab values for VOCs, however, cis-1,2-DCE, TCA, and PCE were detected.

Five test pits (TP-1 through TP-5) were completed using on-site excavation equipment provided by the demolition contractor, Best Enterprise. The locations of the pits are presented on Figure 2. A KEY scientist directed and monitored the test pit activities and visually screened and described the condition and engineering properties of the soil.

Soil samples were field screened for the presence of total ionizable vapors using a calibrated photoionization detector (PID). The samples screened were warmed and the headspace PID reading of the soil was taken by inserting the probe end of the PID into the plastic bag through the seal.

After field screening, selected retained soil samples were submitted to a WDNR-certified laboratory for analysis. Soil samples were selected based on soil screening data, presence of fill material or native soil, olfactory evidence, staining, or a depth above the soil/water interface. Soil samples for laboratory analysis were placed in laboratory supplied containers and transported to the laboratory under chain of custody protocols. Soil samples were analyzed for VOCs using Method 8260B from TP-1 through TP-4.

Samples collected from test pit TP-5 were collected for field screening and observation only due to the presence of a floor drain in the vicinity of the test pit. No apparent impacts were evident from soil observations and screening at this location.

Test pit activities revealed that Test Pit 1 (TP-1) samples yielded volatiles above the NR 720 RCL for the groundwater pathway. However, TCE and PCE values were "J" flagged, meaning that they are at a level so low that proper quantification at the laboratory is not possible. Based on the results of the Test Pit investigation, no source of VOCs was identified beneath the building.

Following WDNR review of the SI/ROAR submitted in March 2017, on May 17, 2017 WDNR requested additional investigation through advancing six direct push borings (GP17-1 through GP17-6) and installing small-diameter polyvinyl chloride (PVC) risers and slotted screens in two of the borings (GP17-1 and GP17-2).

Soil samples were collected from each of the direct push borings for PAHs and metals analysis from the 2 to 3 foot depth interval. Soil samples for VOCs analysis were collected from each boring except GP17-3, located between MW-11 and MW-12. Soil samples revealed no detectable VOCs, and low-level PAHs and metals detections below respective NR 720 RCLS for industrial direct contact and the groundwater pathway.

Groundwater samples collected from small-diameter wells GP17-1 and GP17-2 yielded no exceedances of the NR 140 ES. Groundwater samples from GP17-2 yielded exceedances of the NR 140 PAL for PAHs benzo(a)pyrene, benzo(b)fluoranthene, and chrysene.

- 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.

No contamination is known to extend beyond the source 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 hindered the site investigation. The on-site buildings were razed in December 2016.

B. Soil

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

Chlorinated VOCs in soil are likely associated with the historical use of CVOCs at the Site, specifically the former Kool Brothers facility. Detections of petroleum hydrocarbons are attributable to coatings such as paint.

The extent of soil impact has been delineated and is limited to the vicinity of the loading ramp area south of the former warehouse and east of the former storage building, and beneath the floor of the former solvent and paint storage room. The extent and degree of soil impacts have been horizontally and vertically delineated to the extent practicable, and the soil investigation is considered complete.

- ii. Describe the concentration(s) and types of soil contaminants found in the upper four feet of the soil column. The primary VOC impacts identified in soil samples include the following compounds: cis-1,2-DCE, trans-1,2-DCE, ethylbenzene, PCE, and TCE. The highest VOC concentrations were identified at B-1 and B 8/MW-8.
- 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.

Generic WAC Chapter NR 720 RCLs (March 2017) were used to establish the extent of soil impacts for industrial land use. No site-specific standards were calculated 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.

Dissolved-phase hydrocarbon impacts in groundwater appear to emanate from the former loading dock area of the former main building and extend to the southeast. Groundwater impacts have not been observed to migrate off-site, or impact any receptors such as utility corridors, surface water, water supply wells, or any sub-grade structure.

For the most recent groundwater sampling event for each well, groundwater sampling analytical results exceed the NR 140 ES at MW-4 (TCE), MW-7 (vinyl chloride), MW-8 (TCE), and MW-12 (cis-1,2-DCE and TCE). For the most recent groundwater sampling event for each well, groundwater sampling analytical results exceed the NR 140 PAL at MW-5 (cis-1,2-DCE). The extent of groundwater impacts for the reported release that occurred at the site is defined to the extent practicable.

- 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 or free-phase, non-aqueous liquid has not been identified at the site during this 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.

KEY collected a sub-slab vapor sample (SS-1) on February 6, 2015 from the paint/solvent storage room on the south end of the former main building and analyzed the sample for VOCs. Laboratory results indicated detections of PCE and TCE, however, no VOC concentrations were detected above the small commercial sub-slab vapor risk screening levels (VRSLs; based on US EPA Regional Screening Levels, November 2017).

To eliminate the vapor intrusion pathway in the newly-constructed storage buildings, a seamless 30 mil HDPE liner was placed under the concrete foundation slab prior to construction for the building located over the impacted soil.

- 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).

The site is zoned for industrial land use. The sub-slab air sample was collected beneath the floor slab at an area where products containing VOCs were used (paint and solvent storage). Laboratory analysis of sub-slab air indicate sub-slab vapor levels meet small commercial VRSLs.

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.

No surface water or sediment is present at the site.

- ii. Identify any surface water and/or sediment action levels used to assess the impacts for this pathway and how these were derived. Describe where the DNR action levels were reached or exceeded.

Not applicable.

4. Remedial Actions Implemented and Residual Levels at Closure

- A. General: Provide a brief summary of the remedial action history. List previous remedial action report submittals by name and date. Identify remedial actions undertaken since the last submittal for this project and provide the appropriate documentation in Attachment C.

No remediation other than natural attenuation or eliminating exposure pathways has occurred at the site.

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

No immediate or interim actions were taken at the site.

- 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.

Not applicable.

- 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.

Natural attenuation of the residual impacts was selected as the low-cost option.

- 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.

The extent of soil impact has been delineated and is limited to the vicinity of the former loading ramp area south of the former warehouse and east of the former storage building, and beneath the floor of the former solvent and paint storage room. The extent and degree of soil impacts have been horizontally and vertically delineated to the extent practicable, and the soil investigation is complete.

Dissolved-phase hydrocarbon impacts in groundwater appear to emanate from the former loading dock area of the former main building and extend to the southeast. Groundwater impacts have not been observed to migrate off-site, has not been intercepted by a preferred flow path, or impact any receptors such as utility corridors, surface water, water supply wells, or any sub-grade structure. Soil and groundwater impacts do not extend off-site from the source parcel.

- 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.

A soil sample collected from B-3 yielded detections of ethylbenzene and xylenes that exceed the NR 720 RCL for industrial direct contact.

- 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 yielded laboratory analytical results that exceed the NR 720 RCL for protection of groundwater at B-1, B-3, B-7, B-8, B-10, MW-4, MW-12, and TP-1. Detected hydrocarbons exceeding the NR 720 RCL for protection of groundwater include one or more of the following: cis-1,2-DCE, trans-1,2-DCE, ethylbenzene, naphthalene, PCE, TCE, trimethylbenzenes, and xylenes.

- 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.

The vapor intrusion pathway to the newly-constructed buildings on-site is eliminated through the placement of an HDPE liner beneath the concrete floor slab at areas where significant VOCs detections were observed in soil.

The concrete and asphalt pavement will be inspected and maintained to eliminate the direct contact pathway and to eliminate infiltration of precipitation to groundwater.

- 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).

The results of groundwater sampling and analysis suggest the extent of hydrocarbon impact to groundwater is decreasing and the hydrocarbon concentrations in groundwater are decreasing. Overall, the mass of hydrocarbon impact to groundwater

is decreasing at the site.

- J. Identify how all exposure pathways (soil, groundwater, vapor) were removed and/or adequately addressed by immediate, interim and/or remedial action(s).
No immediate, interim, or remedial action was implemented at the site. Natural attenuation will address soil and groundwater impacts, an HDPE liner eliminates the vapor intrusion pathway, and the surface pavement will eliminate the direct contact pathway and reduce leaching to groundwater.
- K. Identify any system hardware anticipated to be left in place after site closure, and explain the reasons why it will remain.
No active remediation equipment was deployed at the site and no equipment will remain after case closure is granted.
- 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.
For the most recent groundwater sampling event for each well, groundwater sampling analytical results exceed the NR 140 ES at MW-4 (TCE), MW-7 (vinyl chloride), MW-8 (TCE), and MW-12 (cis-1,2-DCE and TCE). For the most recent groundwater sampling event for each well, groundwater sampling analytical results exceed the NR 140 PAL at MW-5 (cis-1,2-DCE).
- 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.
Based on industrial land use, no action level was exceeded for a sub-slab vapor sample collected at an area beneath a building where vapors might be expected (paint and solvent storage room).
- 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 is present at the site and no surface water or sediment samples were collected as part of the contaminant investigation.

5. Continuing Obligations: Situations where sites, including all affected properties and rights-of-way (ROWs), are included on the DNR's GIS Registry. 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 Inclusion on the GIS Registry is Required (ii. - xiv.)	Maintenance Plan Required	
Property Type:					
Source Property	Affected Property (Off-Source)	ROW			
i.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	None of the following situations apply to this case closure request.	NA
ii.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Residual groundwater contamination exceeds ch. NR 140 ESs.	NA
iii.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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 checked="" 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 checked="" 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 checked="" 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://dnrmaps.wi.gov/sl/?Viewer=RR Sites](http://dnrmaps.wi.gov/sl/?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. (These items will not be placed on the GIS Registry.)

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

Check the correct box for this case closure request, and have either a professional engineer or a hydrogeologist, as defined in ch. NR 712, Wis. Adm. Code, sign this document.

[X] A response action(s) for this site addresses groundwater contamination (including natural attenuation remedies).

[X] The response action(s) for this site addresses media other than groundwater.

Engineering Certification

I Kurt McClung hereby certify that I am a registered professional engineer in the State of Wisconsin, registered in accordance with the requirements of ch. A-E 4, Wis. Adm. Code; that this case closure request has been prepared by me or prepared under my supervision in accordance with the Rules of Professional Conduct in ch. A-E 8, Wis. Adm. Code; and that, to the best of my knowledge, all information contained in this case closure request is correct and the document was prepared in compliance with all applicable requirements in chs. NR 700 to 726, Wis. Adm. Code. Specifically, with respect to compliance with the rules, in my professional opinion a site investigation has been conducted in accordance with ch. NR 716, Wis. Adm. Code, and all necessary remedial actions have been completed in accordance with chs. NR 140, NR 718, NR 720, NR 722, NR 724 and NR 726, Wis. Adm. Codes."

Kurt McClung
Printed Name

Senior Engineer
Title

[Handwritten Signature]
Signature

3-30-18
Date



P.E. Stamp and Number

Hydrogeologist Certification

I D'Arcy Gravelle hereby certify that I am a hydrogeologist as that term is defined in s. NR 712.03 (1), Wis. Adm. Code, and that, to the best of my knowledge, all of the information contained in this case closure request is correct and the document was prepared by me or prepared by me or prepared under my supervision and, in compliance with all applicable requirements in chs. NR 700 to 726, Wis. Adm. Code. Specifically, with respect to compliance with the rules, in my professional opinion a site investigation has been conducted in accordance with ch. NR 716, Wis. Adm. Code, and all necessary remedial actions have been completed in accordance with chs. NR 140, NR 718, NR 720, NR 722, NR 724 and NR 726, Wis. Adm. Codes."

D'Arcy Gravelle
Printed Name

Principal Hydrogeologist
Title

[Handwritten Signature]
Signature

3-30-18
Date

A. DATA TABLES

- A.1 Groundwater Analytical Table
- A.2 Soil Analytical Results Table
- A.3 Residual Soil Contamination Table Not Applicable-All Soil Remains On-Site
- A.4 Vapor Analytical Table Not Applicable-No Vapor Samples from Existing Buildings
- A.5 Other Media of Concern Not Applicable No Other Media of Concern
- A.6 Water Level Elevations
- A.7 Other — Not Applicable — No Other Information

Table A.1
Groundwater Sampling Analytical Results Summary
 Realty Opus Property
 867 Valley Road
 Menasha, Wisconsin
 BRRTS No. 02-71-555288
 06-71-578231

PARAMETERS	NR 140		SAMPLE IDENTIFICATION																	
	ES	PAL	Temp Well	MW-1			MW-2			MW-3/MW-3R					MW-4					
			4/20/2010	8/18/2010	11/14/2011	3/19/2012	8/18/2010	11/14/2011	3/19/2012	8/18/2010	11/14/2011	5/30/2013	12/9/2016	9/14/2017	9/14/2017 D	2/11/2011	11/14/2011	3/19/2012	2/14/2013	5/30/2013
Date Collected	---	---	Badger	Badger	Badger	Badger	Badger	Badger	Badger	Badger	Badger	Badger	KEY	KEY	KEY	Badger	Badger	Badger	Badger	Badger
Consultant			Badger	Badger	Badger	Badger	Badger	Badger	Badger	Badger	Badger	KEY	KEY	KEY	Badger	Badger	Badger	Badger	Badger	Badger
Detected VOCs (mg/l)																				
Chloromethane	30	3	< 1.2	ND	< 1.9	ND	ND	< 1.9	ND	ND	< 1.9	ND	< 0.50	< 0.50	0.50J	< 1.9	< 38	ND	ND	ND
1,1-Dichloroethane	850	85	< 0.69	ND	< 0.98	< 0.98	ND	< 0.98	< 0.98	ND	< 0.98	ND	< 0.24	< 0.24	< 0.24	< 0.98	< 19.6	< 0.98	ND	ND
1,1-Dichloroethene	7	0.7	< 0.7	< 0.7	< 0.6	< 0.6	< 0.7	< 0.6	< 0.6	< 0.7	< 0.6	< 0.4	< 0.41	< 0.41	< 0.41	2.11	< 12	1.23 J	0.94 J	< 0.4
cis-1,2-Dichloroethene	70	7	34	< 0.78	< 0.74	< 0.74	< 0.78	< 0.74	< 0.74	< 0.78	3.9	< 0.38	< 0.26	< 0.26	< 0.26	420	227	250	200	36
trans-1,2-Dichloroethene	100	20	2.26 J	< 1.3	< 0.79	< 0.79	< 1.3	< 0.79	< 0.79	< 1.3	< 0.79	< 0.35	< 0.26	< 0.26	< 0.26	46	26.2 J	26.9	13.7	3.6
Ethylbenzene	700	140	< 0.55	ND	< 0.78	< 0.78	ND	< 0.78	< 0.78	ND	1.25 J	ND	< 0.50	< 0.50	< 0.50	< 0.78	< 15.6	< 0.78	ND	ND
Tetrachloroethene (PCE)	5	0.5	0.61 J	< 0.43	0.46 J	< 0.44	< 0.43	< 0.44	< 0.44	< 0.43	0.49 J	< 0.33	< 0.50	< 0.50	< 0.50	10.6	< 8.8	2.58	0.54 J	< 0.33
Trichloroethene (TCE)	5	0.5	1.8	< 0.39	< 0.47	< 0.47	< 0.39	< 0.47	< 0.47	< 0.39	3.7	< 0.33	< 0.33	< 0.33	< 0.33	290	223	230	115	44
Vinyl chloride	0.2	0.02	< 0.19	< 0.19	< 0.18	< 0.18	< 0.19	< 0.18	< 0.18	< 0.19	< 0.18	< 0.18	< 0.18	< 0.18	< 0.18	1.26	< 3.6	0.41 J	< 0.18	< 0.18
PAHs (mg/l)																				
Acenaphthene	---	---	---	---	---	---	---	---	---	---	---	---	---	< 0.0076	---	---	---	---	---	---
Acenaphthylene	---	---	---	---	---	---	---	---	---	---	---	---	---	< 0.0062	---	---	---	---	---	---
Anthracene	3,000	600	---	---	---	---	---	---	---	---	---	---	---	< 0.013	---	---	---	---	---	---
Benzo(a)anthracene	---	---	---	---	---	---	---	---	---	---	---	---	---	0.015J	---	---	---	---	---	---
Benzo(a)pyrene	0.2	0.02	---	---	---	---	---	---	---	---	---	---	---	0.014J	---	---	---	---	---	---
Benzo(b)fluoranthene	0.2	0.02	---	---	---	---	---	---	---	---	---	---	---	0.016J	---	---	---	---	---	---
Benzo(g,h,i)perylene	---	---	---	---	---	---	---	---	---	---	---	---	---	0.043	---	---	---	---	---	---
Benzo(k)fluoranthene	---	---	---	---	---	---	---	---	---	---	---	---	---	< 0.0094	---	---	---	---	---	---
Chrysene	0.2	0.02	---	---	---	---	---	---	---	---	---	---	---	< 0.016	---	---	---	---	---	---
Dibenzo(a,h)anthracene	---	---	---	---	---	---	---	---	---	---	---	---	---	< 0.013	---	---	---	---	---	---
Fluoranthrene	400	80	---	---	---	---	---	---	---	---	---	---	---	0.019J	---	---	---	---	---	---
Fluorene	400	80	---	---	---	---	---	---	---	---	---	---	---	< 0.010	---	---	---	---	---	---
Indeno(1,2,3-cd)pyrene	---	---	---	---	---	---	---	---	---	---	---	---	---	< 0.022	---	---	---	---	---	---
1-Methyl Naphthalene	---	---	---	---	---	---	---	---	---	---	---	---	---	< 0.0074	---	---	---	---	---	---
2-Methyl Naphthalene	---	---	---	---	---	---	---	---	---	---	---	---	---	< 0.0061	---	---	---	---	---	---
Naphthalene	100	10	---	---	---	---	---	---	---	---	---	---	---	< 0.023	---	---	---	---	---	---
Phenanthrene	---	---	---	---	---	---	---	---	---	---	---	---	---	< 0.017	---	---	---	---	---	---
Pyrene	250	50	---	---	---	---	---	---	---	---	---	---	---	0.035J	---	---	---	---	---	---
RCRA Metals (ug/l)																				
Arsenic	10	1	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
Barium	2,000	400	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
Cadmium	5	0.5	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
Total Chromium	100	10	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
Lead	15	1.5	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
Mercury	2	0.2	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
Selenium	50	10	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
Silver	50	10	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---

Notes:
 Bold concentrations exceed NR 140 ES
 Italicized concentrations exceed NR 140 PAL
 --- - not analyzed, not applicable or no standard established
 ES - enforcement standard
 J - Results between the limit of detection and limit of quantitation
 PAHs - polynuclear aromatic hydrocarbons
 PAL - preventive action limit
 mg/l - micrograms per liter
 VOCs - volatile organic compounds

PARAMETERS	NR 140		SAMPLE IDENTIFICATION																
	ES	PAL	MW-5						MW-6				MW-7						
			5/13/2011	11/14/2011	3/19/2012	2/14/2013	5/30/2013	9/14/2017	5/13/2011	11/14/2011	3/19/2012	9/14/2017	5/13/2011	11/14/2011	3/19/2012	2/14/2013	5/30/2013	12/7/2016	9/14/2017
Date Collected	---		Badger	Badger	Badger	Badger	Badger	KEY	Badger	Badger	Badger	KEY	Badger	Badger	Badger	Badger	Badger	KEY	KEY
Consultant			Badger																
Detected VOCs (mg/l)																			
Chloromethane	30	3	13	< 1.9	ND	ND	ND	<0.50	11.2	< 1.9	ND	<0.50	< 1.9	< 1.9	ND	ND	ND	<0.50	<0.50
1,1-Dichloroethane	850	85	2.01 J	2.75 J	3.2	ND	ND	0.83J	< 0.98	< 0.98	< 0.98	<0.24	< 0.98	< 0.98	< 0.98	ND	ND	<0.24	<0.24
1,1-Dichloroethene	7	0.7	< 0.6	< 0.6	< 0.6	< 0.4	< 0.4	<0.41	< 0.6	< 0.6	< 0.6	<0.41	< 0.6	< 0.6	< 0.6	< 0.4	< 0.4	<0.41	<0.41
cis-1,2-Dichloroethene	70	7	25.7	25.2	29.5	27.8	21.7	10.8	< 0.74	< 0.74	< 0.74	<0.26	74	27.5	28	28.6	21.4	46.5	33.4
trans-1,2-Dichloroethene	100	20	3.9	2.71	2.95	2.32	3.03	1.2	< 0.79	< 0.79	< 0.79	<0.26	11.8	2.08 J	1.1 J	1.23	0.74 J	4.4	3.0
Ethylbenzene	700	140	39	71	2.99	ND	ND	<0.50	< 0.78	< 0.78	< 0.78	<0.50	< 0.78	2.86	< 0.78	ND	ND	<0.50	<0.50
Tetrachloroethene (PCE)	5	0.5	< 0.44	< 0.44	< 0.44	< 0.33	< 0.33	<0.50	< 0.44	< 0.44	< 0.44	<0.50	< 0.44	< 0.44	2.8	< 0.33	< 0.33	<0.50	<0.50
Trichloroethene (TCE)	5	0.5	4.4	2.72	2.4	1.9	2.49	<0.33	< 0.47	< 0.47	< 0.47	<0.33	20	4.8	< 0.47	2.5	2.72	5.7	2.0
Vinyl chloride	0.2	0.02	< 0.18	< 0.18	< 0.18	< 0.18	< 0.18	<0.18	< 0.18	< 0.18	< 0.18	<0.18	0.26 J	< 0.18	< 0.18	< 0.18	< 0.18	0.33J	0.25J
PAHs (mg/l)																			
Acenaphthene	---	---	---	---	---	---	---	<0.0060	---	---	---	<0.0056	---	---	---	---	---	---	<0.0057
Acenaphthylene	---	---	---	---	---	---	---	<0.0049	---	---	---	<0.0046	---	---	---	---	---	---	<0.0047
Anthracene	3,000	600	---	---	---	---	---	<0.010	---	---	---	<0.0097	---	---	---	---	---	---	<0.0099
Benzo(a)anthracene	---	---	---	---	---	---	---	0.0085J	---	---	---	<0.0070	---	---	---	---	---	---	0.0085J
Benzo(a)pyrene	0.2	0.02	---	---	---	---	---	<0.010	---	---	---	<0.0098	---	---	---	---	---	---	<0.0099
Benzo(b)fluoranthene	0.2	0.02	---	---	---	---	---	0.0067J	---	---	---	<0.0053	---	---	---	---	---	---	<0.0054
Benzo(g,h,i)perylene	---	---	---	---	---	---	---	0.030J	---	---	---	0.024J	---	---	---	---	---	---	0.027J
Benzo(k)fluoranthene	---	---	---	---	---	---	---	<0.0075	---	---	---	<0.0070	---	---	---	---	---	---	<0.0071
Chrysene	0.2	0.02	---	---	---	---	---	<0.013	---	---	---	<0.012	---	---	---	---	---	---	<0.012
Dibenzo(a,h)anthracene	---	---	---	---	---	---	---	<0.0099	---	---	---	<0.0093	---	---	---	---	---	---	<0.0095
Fluoranthrene	400	80	---	---	---	---	---	0.011J	---	---	---	<0.0099	---	---	---	---	---	---	0.014J
Fluorene	400	80	---	---	---	---	---	<0.0079	---	---	---	<0.0074	---	---	---	---	---	---	<0.0075
Indeno(1,2,3-cd)pyrene	---	---	---	---	---	---	---	<0.017	---	---	---	<0.016	---	---	---	---	---	---	<0.017
1-Methyl Naphthalene	---	---	---	---	---	---	---	<0.0058	---	---	---	<0.0055	---	---	---	---	---	---	<0.0056
2-Methyl Naphthalene	---	---	---	---	---	---	---	<0.0049	---	---	---	<0.0045	---	---	---	---	---	---	<0.0046
Naphthalene	100	10	---	---	---	---	---	0.024J	---	---	---	<0.017	---	---	---	---	---	---	<0.017
Phenanthrene	---	---	---	---	---	---	---	<0.014	---	---	---	<0.013	---	---	---	---	---	---	<0.013
Pyrene	250	50	---	---	---	---	---	0.015J	---	---	---	0.013J	---	---	---	---	---	---	0.016J
RCRA Metals (ug/l)																			
Arsenic	10	1	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
Barium	2,000	400	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
Cadmium	5	0.5	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
Total Chromium	100	10	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
Lead	15	1.5	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
Mercury	2	0.2	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
Selenium	50	10	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
Silver	50	10	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---

Notes:

- Bold concentrations exceed NR 140 ES
- Italicized concentrations exceed NR 140 PAL
- - not analyzed, not applicable or no standard established
- ES - enforcement standard
- J - Results between the limit of detection and limit of quantitation
- PAHs - polynuclear aromatic hydrocarbons
- PAL - preventive action limit
- mg/l - micrograms per liter
- VOCs - volatile organic compounds

PARAMETERS	NR 140		MW-8							MW-9	MW-10	MW-11		MW-12			
	ES	PAL	5/13/2011	11/14/2011	3/19/2012	5/30/2013	2/6/2015	12/7/2016	9/14/2017	3/27/2012	3/27/2012	3/27/2012	9/14/2017	3/27/2012	2/14/2013	5/30/2013	9/14/2017
Date Collected	---	---															
Consultant			Badger	Badger	Badger	Badger	KEY	KEY	KEY	Badger	Badger	Badger	KEY	Badger	Badger	Badger	KEY
Detected VOCs (mg/l)																	
Chloromethane	30	3	< 1.9	< 95	ND	ND	< 10.0	<10.0	<10.0	ND	ND	ND	<0.50	ND	ND	ND	<1.2
1,1-Dichloroethane	850	85	< 0.98	< 49	< 0.98	ND	< 4.8	<4.8	<4.8	ND	ND	ND	<0.24	ND	ND	ND	<0.60
1,1-Dichloroethene	7	0.7	< 0.6	< 30	< 0.6	<i>1.0 J</i>	< 8.2	<8.2	<8.2	ND	ND	ND	<0.41	ND	< 0.4	< 0.4	<1.0
cis-1,2-Dichloroethene	70	7	854	890	687	860	1,220	1,440	933	< 0.74	< 0.74	< 0.74	1.2	<i>18.2</i>	158	165	279
trans-1,2-Dichloroethene	100	20	<i>58</i>	<i>40 J</i>	<i>27.5</i>	<i>51</i>	<i>23.9</i>	<i>48.9</i>	<i>38.3</i>	< 0.79	< 0.79	< 0.79	<0.26	<i>1.19 J</i>	3.9	5.3	9.1
Ethylbenzene	700	140	< 0.78	< 39	< 0.78	ND	< 10.0	<10.0	<10.0	ND	ND	ND	<0.50	ND	ND	ND	<1.2
Tetrachloroethene (PCE)	5	0.5	<i>4.8</i>	23 J	17.7	23.2	16.3 J	<10.0	<10.0	< 0.44	< 0.44	< 0.44	<0.50	<i>1.14 J</i>	5.6	5.2	4.9
Trichloroethene (TCE)	5	0.5	62	282	179	247	194	207	54.9	< 0.47	< 0.47	< 0.47	<0.33	<i>1.71</i>	14.7	19.9	19.3
Vinyl chloride	0.2	0.02	1.19	< 9	0.58	1.24	< 3.5	<3.5	<3.5	ND	ND	ND	<0.18	ND	< 0.18	< 0.18	<0.44
PAHs (mg/l)																	
Acenaphthene	---	---	---	---	---	---	< 0.0034	---	<0.0061	---	---	---	<0.0064	---	---	---	<0.0058
Acenaphthylene	---	---	---	---	---	---	0.0030 J	---	<0.0050	---	---	---	<0.0052	---	---	---	<0.0048
Anthracene	3,000	600	---	---	---	---	0.0059 J	---	<0.010	---	---	---	<0.011	---	---	---	<0.010
Benzo(a)anthracene	---	---	---	---	---	---	0.051	---	<0.0076	---	---	---	0.011J	---	---	---	<0.0073
Benzo(a)pyrene	0.2	0.02	---	---	---	---	<i>0.071</i>	---	<0.011	---	---	---	<0.011	---	---	---	<0.010
Benzo(b)fluoranthene	0.2	0.02	---	---	---	---	<i>0.11</i>	---	<i>0.0082J</i>	---	---	---	<0.0060	---	---	---	<0.0055
Benzo(g,h,i)perylene	---	---	---	---	---	---	0.083	---	0.036	---	---	---	0.035J	---	---	---	0.030J
Benzo(k)fluoranthene	---	---	---	---	---	---	0.041 J	---	<0.0076	---	---	---	<0.0079	---	---	---	<0.0073
Chrysene	0.2	0.02	---	---	---	---	<i>0.087</i>	---	<0.013	---	---	---	<0.014	---	---	---	<0.013
Dibenzo(a,h)anthracene	---	---	---	---	---	---	0.014 J	---	<0.010	---	---	---	<0.011	---	---	---	<0.0096
Fluoranthrene	400	80	---	---	---	---	0.091	---	0.015J	---	---	---	<0.011	---	---	---	<0.010
Fluorene	400	80	---	---	---	---	0.0039 J	---	<0.0080	---	---	---	<0.0084	---	---	---	<0.0077
Indeno(1,2,3-cd)pyrene	---	---	---	---	---	---	0.053	---	<0.018	---	---	---	<0.019	---	---	---	<0.017
1-Methyl Naphthalene	---	---	---	---	---	---	0.0080 J	---	<0.0059	---	---	---	<0.0062	---	---	---	<0.0057
2-Methyl Naphthalene	---	---	---	---	---	---	0.0082 J	---	<0.0049	---	---	---	<0.0052	---	---	---	<0.0047
Naphthalene	100	10	---	---	---	---	0.0081 J	---	<0.018	---	---	---	<0.019	---	---	---	<0.018
Phenanthrene	---	---	---	---	---	---	0.045 J	---	<0.014	---	---	---	<0.015	---	---	---	<0.013
Pyrene	250	50	---	---	---	---	0.11	---	0.016J	---	---	---	0.019J	---	---	---	0.013J
RCRA Metals (ug/l)																	
Arsenic	10	1	---	---	---	---	<i>7.5 J</i>	---	---	---	---	---	---	---	---	---	---
Barium	2,000	400	---	---	---	---	75.1	---	---	---	---	---	---	---	---	---	---
Cadmium	5	0.5	---	---	---	---	< 0.60	---	---	---	---	---	---	---	---	---	---
Total Chromium	100	10	---	---	---	---	< 2.1	---	---	---	---	---	---	---	---	---	---
Lead	15	1.5	---	---	---	---	< 3.0	---	---	---	---	---	---	---	---	---	---
Mercury	2	0.2	---	---	---	---	< 0.10	---	---	---	---	---	---	---	---	---	---
Selenium	50	10	---	---	---	---	< 6.7	---	---	---	---	---	---	---	---	---	---
Silver	50	10	---	---	---	---	< 2.7	---	---	---	---	---	---	---	---	---	---

Notes:

Bold concentrations exceed NR 140 ES
Italicized concentrations exceed NR 140 PAL
--- - not analyzed, not applicable or no standard established
ES - enforcement standard
J - Results between the limit of detection and limit of quantitation
PAHs - polynuclear aromatic hydrocarbons
PAL - preventive action limit
mg/l - micrograms per liter
VOCs - volatile organic compounds

PARAMETERS	NR 140		MW-13				GP17-01	GP17-02	
	ES	PAL	3/27/2012	2/14/2013	5/30/2013	12/7/2016	7/11/2017	7/11/2017	9/14/2017
Date Collected	---	---							
Consultant			Badger	Badger	Badger	KEY	KEY	KEY	KEY
Detected VOCs (mg/l)									
Chloromethane	30	3	ND	ND	ND	<0.50	<0.50	<0.50	0.63J
1,1-Dichloroethane	850	85	ND	ND	ND	<0.24	<0.24	<0.24	<0.24
1,1-Dichloroethene	7	0.7	ND	< 0.4	< 0.4	<0.41	<0.41	<0.41	<0.41
cis-1,2-Dichloroethene	70	7	<i>19.1</i>	< 0.38	< 0.38	<0.26	<0.26	<0.26	<0.26
trans-1,2-Dichloroethene	100	20	<i>1.27 J</i>	< 0.35	< 0.35	<0.26	<0.26	<0.26	<0.26
Ethylbenzene	700	140	ND	ND	ND	<0.50	<0.50	<0.50	<0.50
Tetrachloroethene (PCE)	5	0.5	<i>1.06 J</i>	< 0.33	< 0.33	<0.50	<0.50	<0.50	<0.50
Trichloroethene (TCE)	5	0.5	<i>1.73</i>	< 0.33	< 0.33	<0.33	<0.33	<0.33	<0.33
Vinyl chloride	0.2	0.02	ND	< 0.18	< 0.18	<0.18	<0.18	<0.18	<1.0
PAHs (mg/l)									
Acenaphthene	---	---	---	---	---	---	0.0082J	<0.0061	<0.0060
Acenaphthylene	---	---	---	---	---	---	<0.0050	0.0078J	<0.0049
Anthracene	3,000	600	---	---	---	---	<0.010	<0.010	<0.010
Benzo(a)anthracene	---	---	---	---	---	---	<0.0076	0.010J	0.012J
Benzo(a)pyrene	0.2	0.02	---	---	---	---	<0.011	<i>0.034J</i>	<0.010
Benzo(b)fluoranthene	0.2	0.02	---	---	---	---	<0.0057	<i>0.049</i>	0.012J
Benzo(g,h,i)perylene	---	---	---	---	---	---	0.014J	0.040	0.037
Benzo(k)fluoranthene	---	---	---	---	---	---	<0.0076	0.036J	<0.0075
Chrysene	0.2	0.02	---	---	---	---	<0.013	<i>0.054J</i>	0.013J
Dibenzo(a,h)anthracene	---	---	---	---	---	---	<0.010	<0.010	<0.0099
Fluoranthrene	400	80	---	---	---	---	0.011J	0.070	0.021J
Fluorene	400	80	---	---	---	---	<0.0080	<0.0080	<0.0079
Indeno(1,2,3-cd)pyrene	---	---	---	---	---	---	<0.018	0.028J	<0.017
1-Methyl Naphthalene	---	---	---	---	---	---	0.041	0.013J	<0.0058
2-Methyl Naphthalene	---	---	---	---	---	---	0.059	0.019J	<0.0049
Naphthalene	100	10	---	---	---	---	0.036J	0.026J	<0.018
Phenanthrene	---	---	---	---	---	---	0.028J	0.036J	<0.014
Pyrene	250	50	---	---	---	---	0.018J	0.076	0.019J
RCRA Metals (ug/l)									
Arsenic	10	1	---	---	---	---	<8.3	<8.3	---
Barium	2,000	400	---	---	---	---	80	80.7	---
Cadmium	5	0.5	---	---	---	---	<1.3	<1.3	---
Total Chromium	100	10	---	---	---	---	<2.5	<2.5	---
Lead	15	1.5	---	---	---	---	<4.3	<4.3	---
Mercury	2	0.2	---	---	---	---	<0.13	<0.13	---
Selenium	50	10	---	---	---	---	<16.6	<16.6	---
Silver	50	10	---	---	---	---	<3.3	<3.3	---

Notes:

Bold concentrations exceed NR 140 ES
 Italicized concentrations exceed NR 140 PAL
 --- - not analyzed, not applicable or no standard established
 ES - enforcement standard
 J - Results between the limit of detection and limit of quantitation
 PAHs - polynuclear aromatic hydrocarbons
 PAL - preventive action limit
 mg/l - micrograms per liter
 VOCs - volatile organic compounds

Table A.6
Groundwater Elevation Summary
 Realty Opus Property
 867 Valley Road
 Menasha, Wisconsin
 BRRTS No. 02-71-555288
 06-71-578231

Well ID	Date	Ground Surface Elevation (feet amsl)	Top of Casing Elevation (feet amsl)	Depth to Water (feet btoc)	Depth to Bottom (feet btoc)	Screen Length (feet)	Groundwater Elevation (feet amsl)
MW-1	5/2/2011	783.88	783.55	NM	13.25	10	
	5/13/2011			NM			
	11/14/2011			3.12			780.43
	3/19/2012			3.86			779.69
	3/27/2012			NM			
MW-2	5/2/2011	782.86	782.44	NM	15.00	10	
	5/13/2011			NM			
	11/14/2011			3.10			779.34
	3/19/2012			4.21			778.23
	3/27/2012			NM			
MW-3	5/2/2011	781.44	781.12	NM	13.00	10	
	5/13/2011			NM			
	11/14/2011			0.50			780.62
	3/19/2012			1.62			779.50
	3/27/2012			NM			
	12/7/2015			2.22			778.90
	9/14/2017			4.10			777.02
MW-4	5/2/2011	782.87	782.54	NM	14.00	10	
	5/13/2011			NM			
	11/14/2011			1.40			781.14
	3/19/2012			1.20			781.34
	3/27/2012			NM			
	12/7/2015	Well damaged - abandoned in accordance with NR 141					
MW-5	5/2/2011	782.85	782.52	0.86	13.00	10	781.66
	5/13/2011			1.10			781.42
	11/14/2011			1.20			781.32
	3/19/2012			2.60			779.92
	3/27/2012			NM			
	9/14/2017			1.76			780.76
MW-6	5/2/2011	782.64	782.31	2.76	14.50	10	779.55
	5/13/2011			2.27			780.04
	11/14/2011			3.30			779.01
	3/19/2012			3.40			778.91
	3/27/2012			NM			
	9/14/2017			1.47			780.84

Table A.6
Groundwater Elevation Summary
 Realty Opus Property
 867 Valley Road
 Menasha, Wisconsin
 BRRTS No. 02-71-555288
 06-71-578231

Well ID	Date	Ground Surface Elevation (feet amsl)	Top of Casing Elevation (feet amsl)	Depth to Water (feet btoc)	Depth to Bottom (feet btoc)	Screen Length (feet)	Groundwater Elevation (feet amsl)
MW-7	5/2/2011	782.25	782.94	0.34	15.00	10	782.60
	5/13/2011			2.92			780.02
	11/14/2011			3.40			779.54
	3/19/2012			3.39			779.55
	3/27/2012			NM			
	12/7/2016			2.39			780.55
	9/14/2017			1.32			781.62
MW-8	5/2/2011	782.37	782.04	0.69	14.50	10	781.35
	5/13/2011			1.06			780.98
	11/14/2011			2.90			779.14
	3/19/2012			0.80			781.24
	3/27/2012			NM			
	12/7/2015			1.32			780.72
	9/14/2017			2.00			780.04
MW-9	5/2/2011	781.56	782.14	NM	17.70	10	
	5/13/2011			NM			
	11/14/2011			NM			
	3/19/2012			1.50			780.64
	3/27/2012			1.29			780.85
MW-10	5/2/2011	781.80	781.38	NM	15.50	10	
	5/13/2011			NM			
	11/14/2011			NM			
	3/19/2012			2.62			778.76
	3/27/2012			1.51			779.87
MW-11	5/2/2011	782.72	782.30	NM	14.40	10	
	5/13/2011			NM			
	11/14/2011			NM			
	3/19/2012			1.88			780.42
	3/27/2012			1.75			780.55
	9/14/2017			2.21			780.09
MW-12	5/2/2011	781.95	781.53	NM	14.00	10	
	5/13/2011			NM			
	11/14/2011			NM			
	3/19/2012			4.78			776.75
	3/27/2012			4.09			777.44
	9/14/2017			2.00			779.53
MW-13	5/2/2011	782.61	782.19	NM	16.70	10	
	5/13/2011			NM			
	11/14/2011			NM			
	3/19/2012			9.51			772.68
	3/27/2012			8.45			773.74
	12/7/2015			4.52			777.67

Notes:
 btoc - below top of casing

B. Maps, Figures and Photos

B.1. Location Maps

B.1.a. Location Map

B.1.b. Detailed Site Map

B.1.c. RR Sites Map

B.2. Soil Figures

B.2.a. Soil Contamination

B.2.b. Residual Soil Contamination Not Applicable—All Soil Remains On-Site

B.3. Groundwater Figures

B.3.a. Geologic Cross-Section Figure

B.3.b. Groundwater Isoconcentration

B.3.c. Groundwater Flow Direction

B.3.d. Monitoring Wells

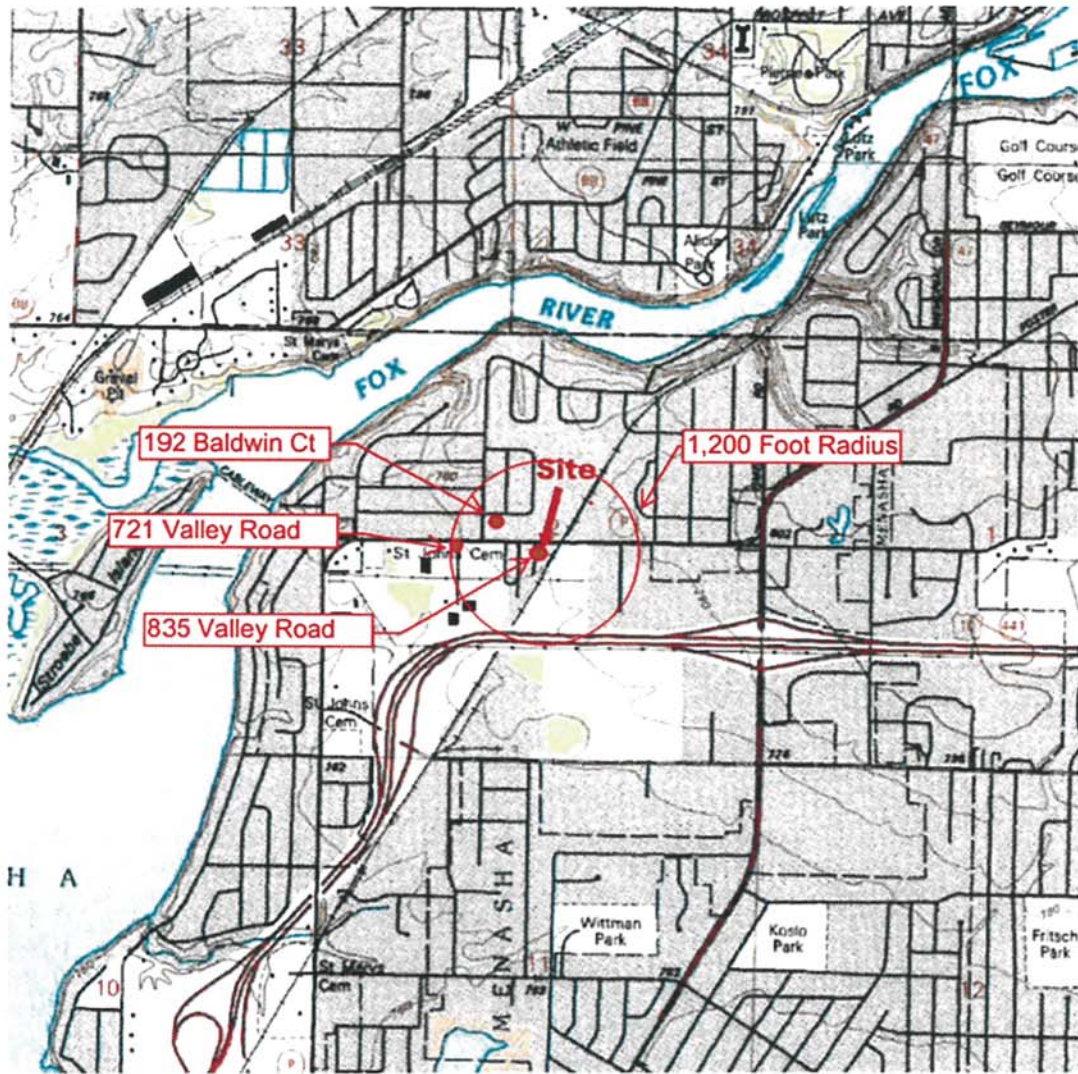
B.4. Vapor Maps and Other Media

B.4.a. Vapor Intrusion Map Not Applicable—Vapor Barriers are Installed Beneath Building

B.4.b. Other media of concern (e.g., sediment or surface water) Not Applicable-Other Impacted Media

B.4.c. Other Not Applicable—Other Maps Necessary

B.5. Structural Impediment Photos Not Applicable—No Impediments



● Potable Well In Use as of 12/3/16

Location: Menasha, Wisconsin	Map Year: 1997
Project: 1608-0053	Date: 10/18/16
	Scale: 124;000
	Series: 7.5'

FIGURE B.1.A
SITE LOCATION MAP
867 VALLEY ROAD
MENASHA, WISCONSIN



MIRON CONSTRUCTION CO.
BRRTS # 03-71-000876

VACANT WOODED LAND

ALPHA-PRIME INC.
(PAPER AND PAPERBOARD CONVERTING)

PROPERTY LINE

VALLEY ROAD

WOW LOGISTICS
DISTRIBUTION CENTER

REALTY OPUS PROPERTY

BRRTS # 02-71-555288

JEFF'S WELDING & REPAIR
BRRTS # 03-71-001409

SCALE IN FEET



LEGEND

- SOIL BORING LOCATION
- MONITORING WELL LOCATION
- GEOPROBE BORING LOCATION
- SUB-SLAB VAPOR LOCATION
- TEST PIT LOCATION
- PROPERTY BOUNDARY
- FORMER STRUCTURE (RAZED 2016)

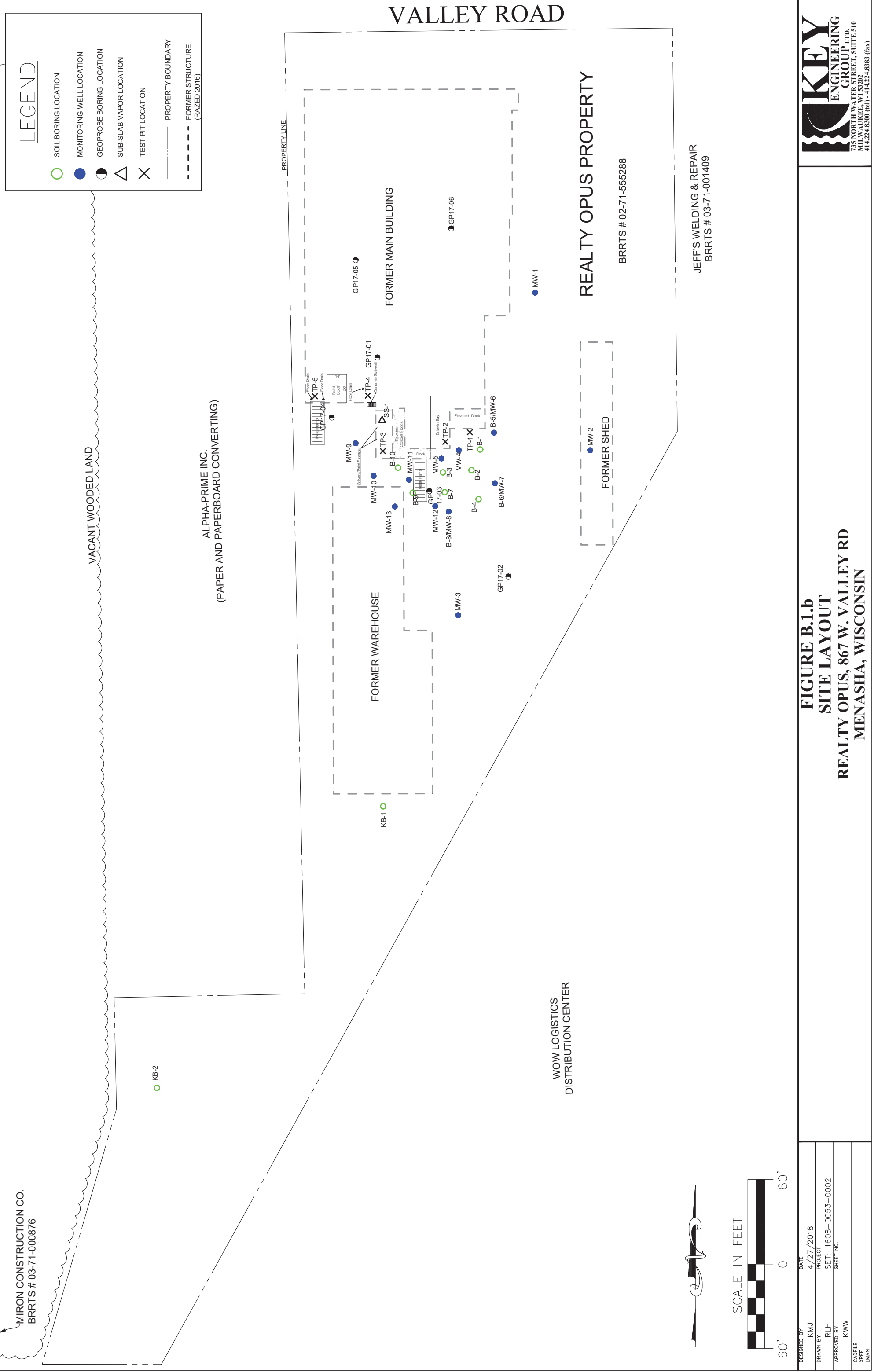


FIGURE B.1.b
SITE LAYOUT

REALTY OPUS, 867 W. VALLEY RD
MENASHA, WISCONSIN

DESIGNED BY: KMJ DATE: 4/27/2018

DRAWN BY: RLH PROJECT SET: 1608-0053-0002

APPROVED BY: KWW SHEET NO.

CADFILE

XREF

EMAT





Location:
Menasha, Wisconsin

Map Year:
2018

Project:
1608-0053

Date:
1/12/2018



Scale:
NTS
Series:
NA

FIGURE B.1.C.
RR SITES MAP
867 VALLEY ROAD
MENASHA, WISCONSIN



MIRON CONSTRUCTION CO.
BRRTS # 03-71-000876

LEGEND

- SOIL BORING LOCATION
- MONITORING WELL LOCATION
- GEOPROBE BORING LOCATION
- △ SUB-SLAB VAPOR LOCATION
- X TEST PIT LOCATION
- PROPERTY BOUNDARY
- FORMER STRUCTURE (RAZED 2016)
- TEMPORARY WELL
- TEMPORARY WELL GP17-03 WAS NOT ANALYZED FOR VOCs. THIS SOIL SAMPLE WAS ANALYZED FOR PAHs AND YIELDED A DETECTION OF NAPHTHALENE AT 0.153 mg/kg.

VALLEY ROAD

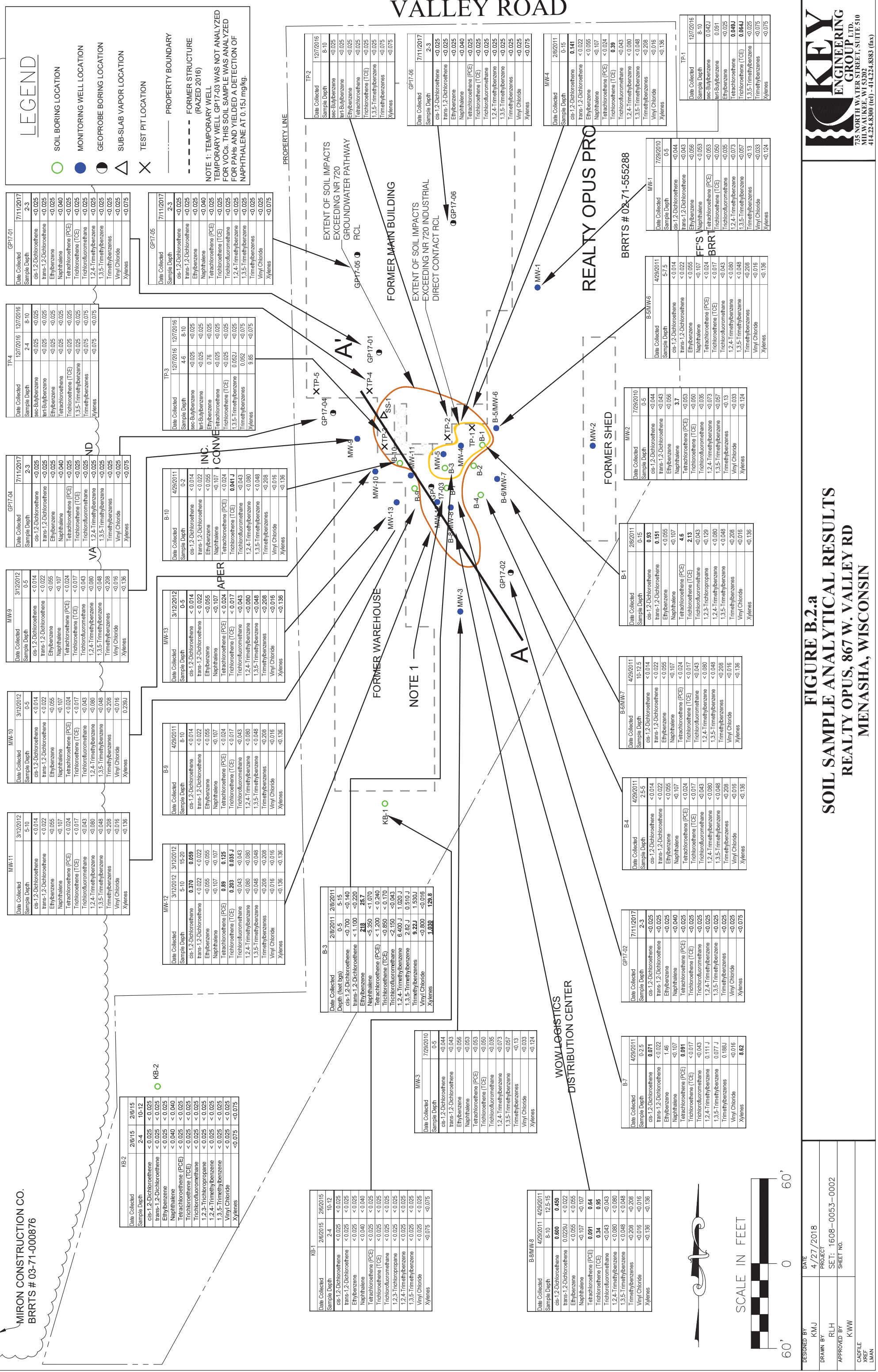


FIGURE B.2.a
SOIL SAMPLE ANALYTICAL RESULTS
REALTY OPUS, 867 W. VALLEY RD
MENASHA, WISCONSIN



SCALE IN FEET



DESIGNED BY	KMJ	DATE	4/27/2018
DRAWN BY	RLH	PROJECT	1608-0053-0002
APPROVED BY	KWW	SET:	1608-0053-0002
CADFILE		SHEET NO.	
XREF			
DMAT			

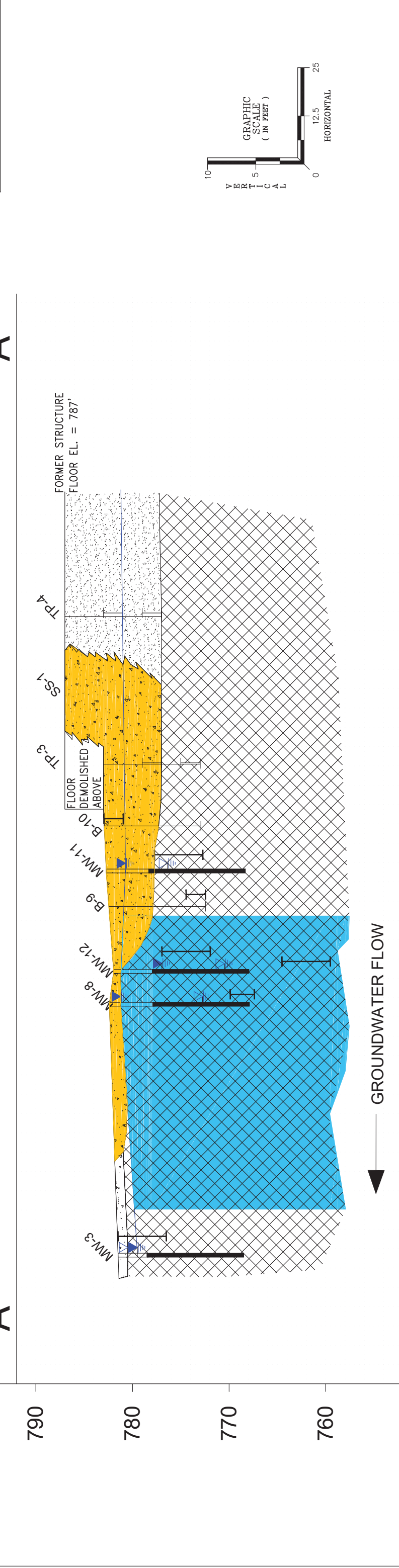
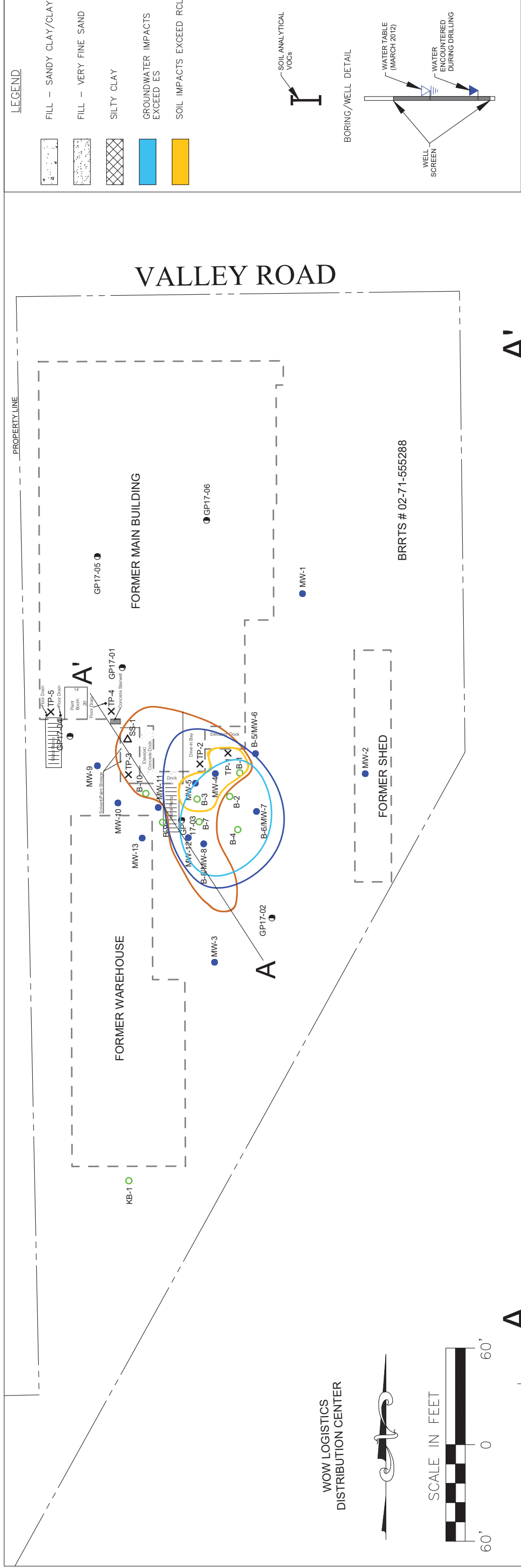


FIGURE B.3.a.1

GEOLOGIC CROSS SECTION A-A'

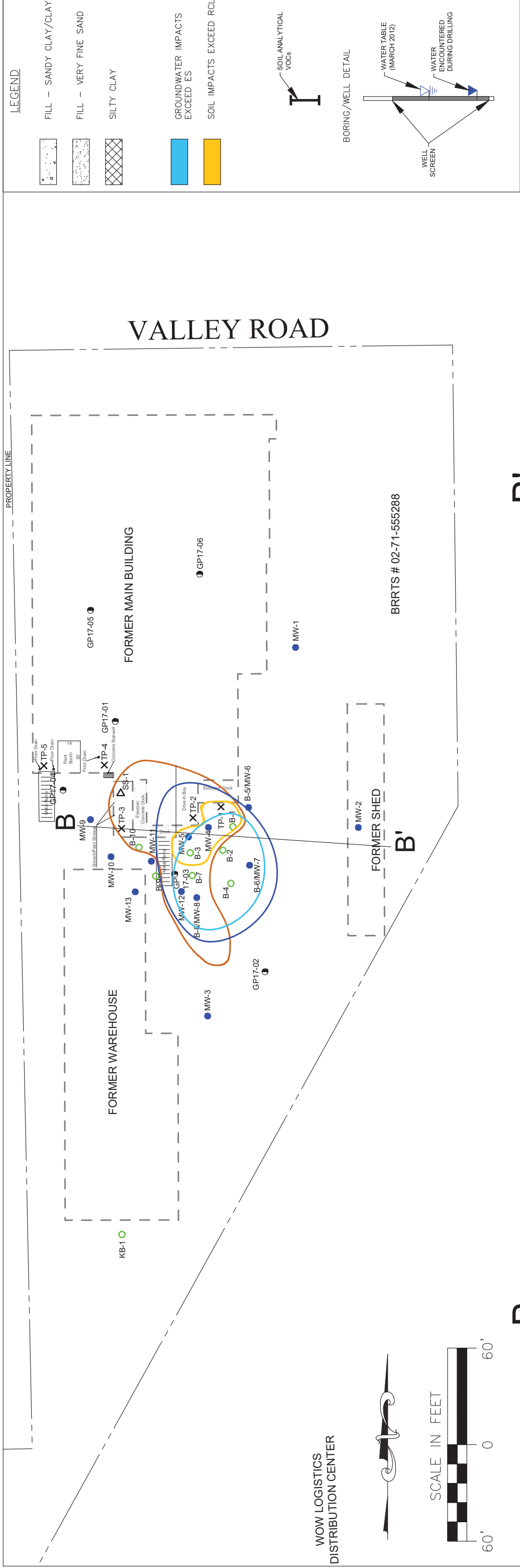
REALTY OPUS, 867 W. VALLEY RD

MENASHA, WISCONSIN

DESIGNED BY	DATE
KMJ	4/27/2018
DRAWN BY	PROJECT
RLH	SET: 1608-0053-0002
APPROVED BY	SHEET NO.
KWW	
CADFILE	
REF	
EMT	

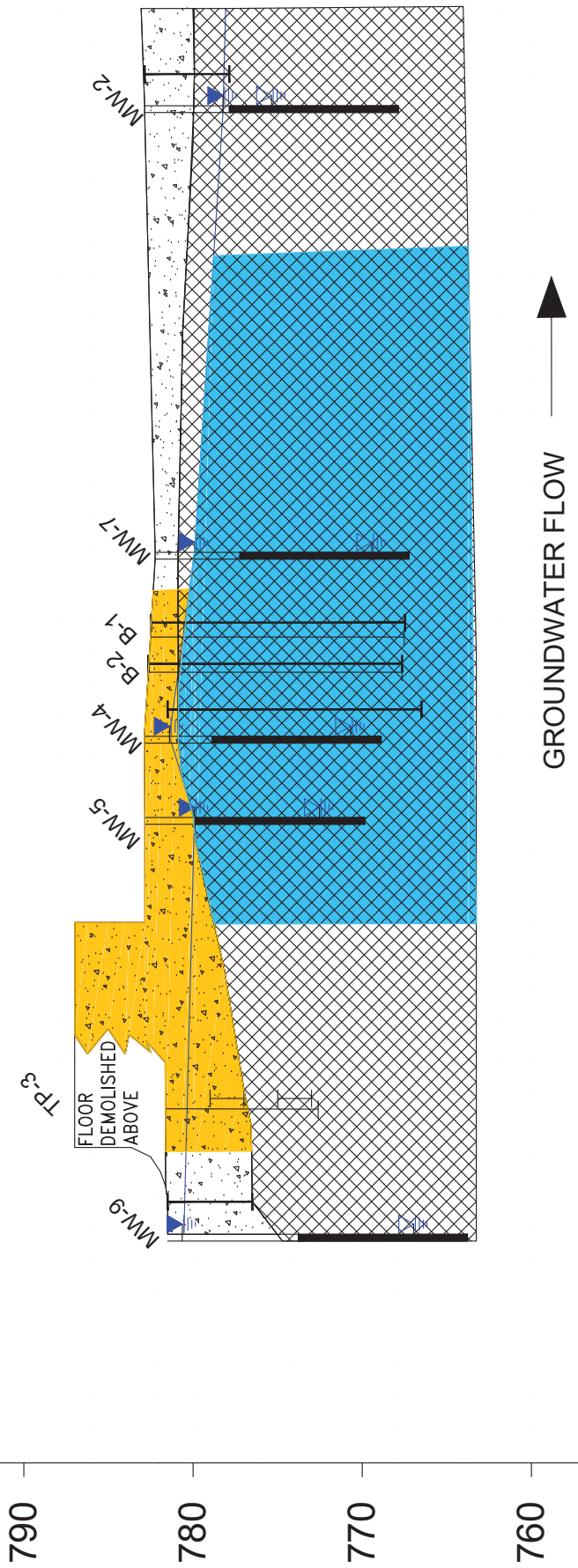
KEY ENGINEERING GROUP LTD.

725 NORTH WATERS STREET, SUITE 510
 MENASHA, WI 53009
 414.224.8300 (cell) - 414.224.8383 (fax)

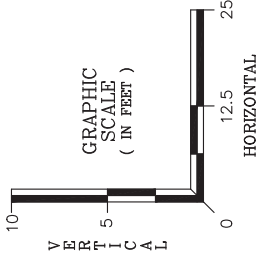


B

B'



GROUNDWATER FLOW →



WOW LOGISTICS
DISTRIBUTION CENTER



DESIGNED BY	KMJ
DRAWN BY	RLH
APPROVED BY	KWW
CADFILE	AREP LWAT

DATE	4/27/2018
PROJECT	REALTY OPUS, 867 W. VALLEY RD MENASHA, WISCONSIN
SET:	1608-0053-0002
SHEET NO.	

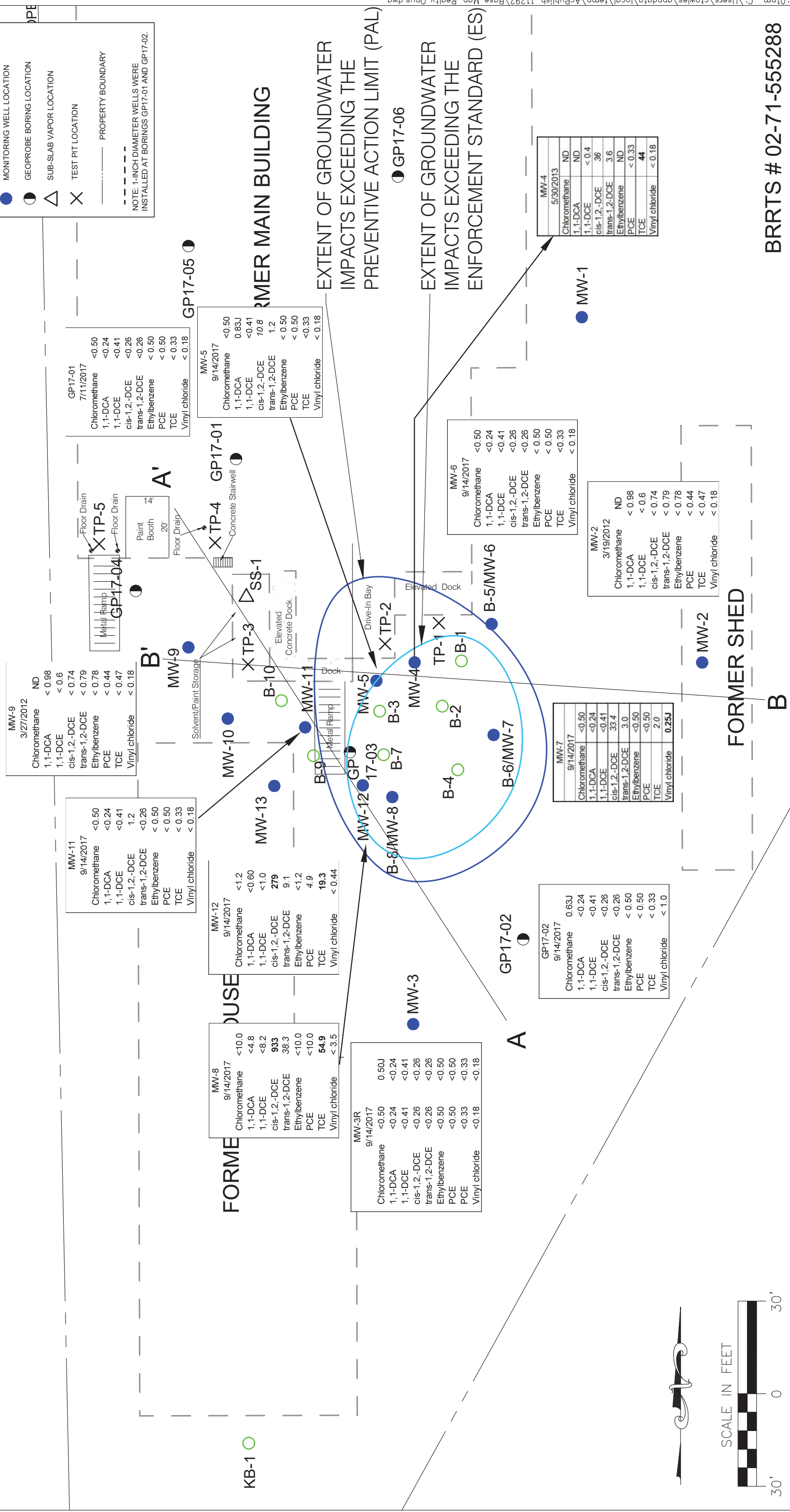
FIGURE B.3.a.2
CROSS SECTION B-B'
REALTY OPUS, 867 W. VALLEY RD
MENASHA, WISCONSIN



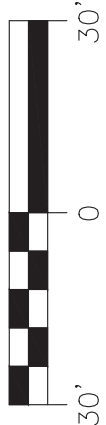
LEGEND

- SOIL BORING LOCATION
- MONITORING WELL LOCATION
- GEOPROBE BORING LOCATION
- △ SUB-SLAB VAPOR LOCATION
- X TEST PIT LOCATION
- PROPERTY BOUNDARY
- - -

NOTE: 1-INCH DIAMETER WELLS WERE INSTALLED AT BORINGS GP17-01 AND GP17-02.



SCALE IN FEET












DESIGNED BY	KMJ	DATE	4/27/2018
DRAWN BY	RLH	PROJECT	1608-0053-0002
APPROVED BY	KWW	SET	1608-0053-0002
CADFILE		SHEET NO.	
REF			
UNIT			

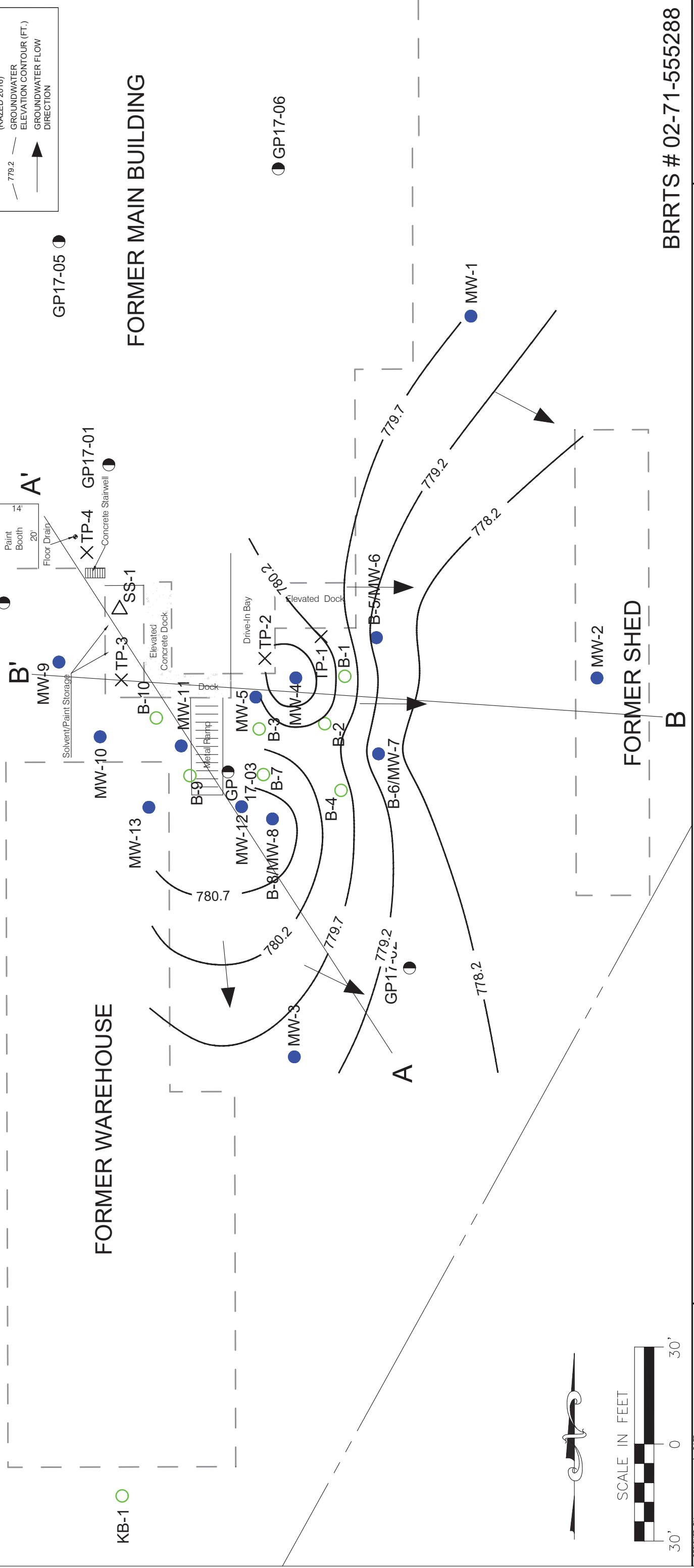
FIGURE B.3.b
GROUNDWATER ISOCONCENTRATION MAP
 REALTY OPUS, 867 W. VALLEY RD
 MENASHA, WISCONSIN

BRRRTS # 02-71-555288



LEGEND

-  SOIL BORING LOCATION
-  MONITORING WELL LOCATION
-  GEOPROBE BORING LOCATION
-  SUB-SLAB VAPOR LOCATION
-  TEST PIT LOCATION
-  PROPERTY BOUNDARY
-  FORMER STRUCTURE (RAZED 2016)
-  GROUNDWATER ELEVATION CONTOUR (FT.)
-  GROUNDWATER FLOW DIRECTION



SCALE IN FEET

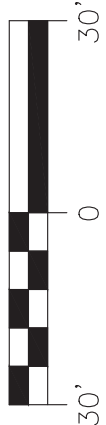


FIGURE B.3.c
GROUNDWATER FLOW MAP
 REALTY OPUS, 867 W. VALLEY RD
 MENASHA, WISCONSIN

DESIGNED BY	KMJ	DATE	4/27/2018
DRAWN BY	RJN	PROJECT	1608-0053-0002
APPROVED BY	KWW	SET	1608-0053-0002
CADFILE	AREP	SHEET NO.	
USER	EMAT		

BRRRTS # 02-71-555288



MIRON CONSTRUCTION CO.
BRRTS # 03-71-000876

VACANT WOODED LAND

ALPHA-PRIME INC.
(PAPER AND PAPERBOARD CONVERTING)

LEGEND	
	SOIL BORING LOCATION
	MONITORING WELL LOCATION
	GEOPROBE BORING LOCATION
	SUB-SLAB VAPOR LOCATION
	TEST PIT LOCATION
	PROPERTY BOUNDARY
	FORMER STRUCTURE (RAZED 2016)

KB-2

PROPERTY LINE

FORMER WAREHOUSE

FORMER MAIN BUILDING

WOW LOGISTICS
DISTRIBUTION CENTER

REALTY OPUS PROPERTY

BRRTS # 02-71-555288



SCALE IN FEET



JEFF'S WELDING & REPAIR
BRRTS # 03-71-001409

ALL MONITORING WELLS ARE ABANDONED.

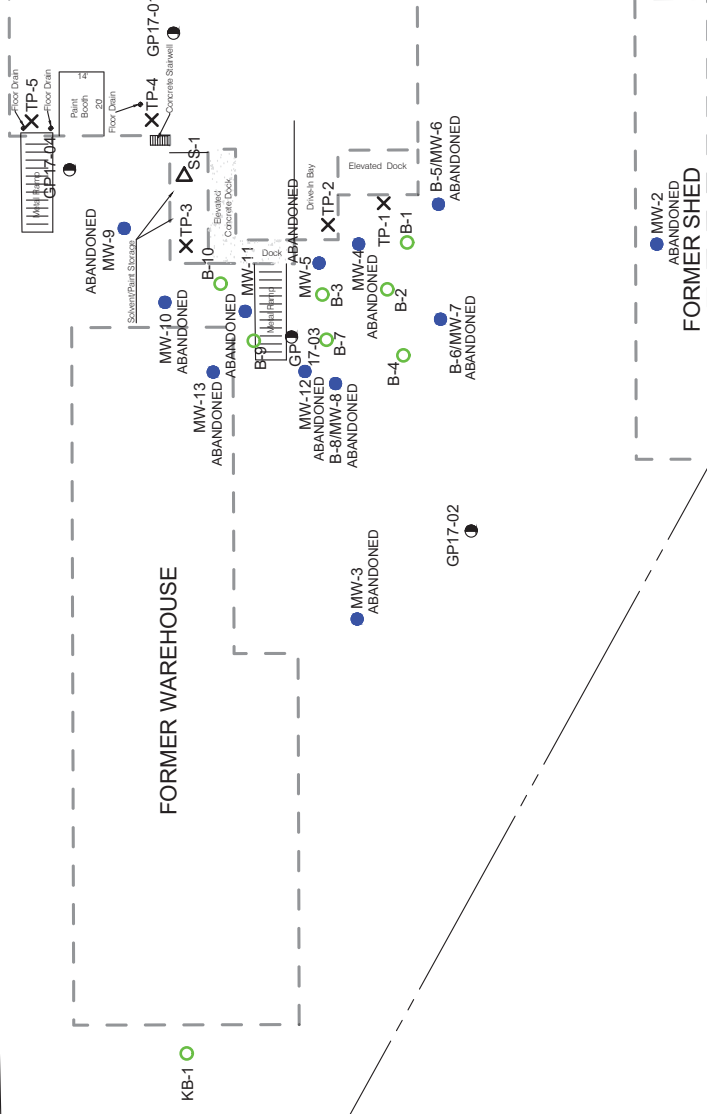


FIGURE B.3.d
MONITORING WELLS
REALTY OPUS, 867 W. VALLEY RD
MENASHA, WISCONSIN

DESIGNED BY: KMJ DATE: 4/27/2018

DRAWN BY: RLH PROJECT SET: 1608-0053-0002

APPROVED BY: KWW SHEET NO.

CADFILE

XREF

EMAT



725 NORTH WATER STREET, SUITE 510
MILWAUKEE, WI 53202
414.224.8300 (cell) - 414.224.8383 (fax)

C. Documentation of Remedial Action

Not Applicable-No Active Remedial Action

D. Maintenance Plan(s) and Photographs

- D.1. Impermeable Barrier Maintenance Plan
- D.2. Location map
- D.3. Photographs
- D.4. Maintenance Log 4400-305

COVER or BARRIER MAINTENANCE PLAN

March 30, 2018

Property Located at:

867 Valley Road
Menasha, Wisconsin 54952

DNR BRRTS # 02-71-555288, FID # 471007130

LEGAL DESCRIPTION:

Lot One (1) Certified Survey Map No. 3878, filed in the Office of the Register of Deeds for Winnebago County, Wisconsin on December 11, 1997, I Volume 1 on Page 3878, as Document No. 991791, said Survey Map being part of the Northwest $\frac{1}{4}$ of the Southeast $\frac{1}{4}$ and part of the Northeast $\frac{1}{4}$ of the Southwest $\frac{1}{4}$ of Section 2, Township 20 North, Range 17 East, City of Menasha, Winnebago County, Wisconsin.

TAX /Parcel Identification Number 740-0753-00

Introduction

This document is the Maintenance Plan for an engineered barrier at the above-referenced property in accordance with the requirements of s. NR 724.13 (2), Wis. Adm. Code. The on-going maintenance activities for the property owner and all successors, relate to the existing engineered barrier which addresses or occupies the area over the contaminated soil.

More site-specific information about this property/site may be found in:

- The case file in the DNR Northeast Region office,
- At <http://dnr.wi.gov/topic/Brownfields/wrrd.html>, which includes:
 - BRRTS on the Web (DNR's internet based data base of contaminated sites) for the link to a PDF for site-specific information at the time of closure and on continuing obligations;
 - RR Sites Map for a map view of the site, and
- The DNR project manager for Winnebago County.

D.1. Descriptions:

(Form 4400-202, Attachment D, Part D1. – brief description of the type, depth and location of residual contamination, description of the system/cover/barrier to be maintained, and its location on the site, maintenance activities, and contact information.)

Description of Contamination

Soil contaminated by volatile organic compounds (VOCs) is located at a depth of less than 4 feet from a former manufacturing building. Currently there are eight storage buildings located on-site identified as buildings A through H. These buildings are identified starting with A from west to east and north to south with a total of three rows of buildings. The first row and most northern row consists of 4 buildings, the second row moving south has 3 buildings, and last most southern row has 1 building nearest the southern point of the property. The area of impacted soil lies beneath building F which is the center building of the second row (see Figure D.2). Groundwater contaminated by VOCs is located at a depth of less than 4 feet.

Description of the [Cover/Barrier] to be Maintained

The barrier consists of a concrete foundation slab and asphalt pavement. It is located on-site as shown on the attached Figure D.2.

Cover/Building/Slab/Barrier Purpose

The concrete foundation slab and asphalt pavement over the contaminated soil serve as a barrier to prevent direct human contact with residual soil contamination that might otherwise pose a threat to human health. The cover/barrier also acts as a partial infiltration barrier to minimize future soil-to-groundwater contamination migration that would violate the groundwater standards in ch. NR 140, Wisconsin Administrative Code. Based on the current use of the Industrial-zoned property, the barrier should function as intended unless disturbed.

Annual Inspection

The concrete and asphalt overlying the contaminated soil and as depicted in Figure D.2 will be inspected once a year, normally in the spring after all snow and ice is gone, for deterioration, cracks, and other potential problems that can cause additional infiltration into or exposure to underlying soils. The inspections will be performed by the property owner or their designated representative. The inspections will be performed to evaluate damage due to settling, exposure to the weather, wear from traffic, increasing age and other factors. Any area where soils have become or are likely to become exposed and where infiltration from the surface will not be effectively minimized will be documented.

A log of the inspections and any repairs will be maintained by the property owner and is included as D.4, Form 4400-305, Continuing Obligations Inspection and Maintenance Log. The log will include recommendations for necessary repair of any areas where underlying soils are exposed and where infiltration from the surface will not be effectively minimized. Once repairs are completed, they will be documented in the inspection log. A copy of the maintenance plan and inspection log will be kept at the site; or, if there is no acceptable place (for example, no building is present) to keep it at the site, at the address of the property owner and available for submittal or inspection by Wisconsin Department of Natural Resources (WDNR) representatives upon their request.

[Note: The DNR may, in some instances, require in the case closure letter that the inspection log be submitted at least annually after every inspection. If the case closure letter requires that, then add the following sentence to the paragraph above: A copy of the inspection log must be submitted electronically to the DNR after every inspection, at least annually.]

Maintenance Activities

(Form 4400-202, Attachment D, Part D1. – Description of Maintenance Actions required for maximizing effectiveness of the cover/barrier/engineered control, feature or other action for which maintenance is required.)

If problems are noted during the annual inspections or at any other time during the year, repairs will be scheduled as soon as practical. Repairs can include patching and filling or larger resurfacing or construction operations. In the event that necessary maintenance activities expose the underlying soil, the owner must inform maintenance workers of the direct contact exposure hazard and provide them with appropriate personal protection equipment (PPE). The owner must also sample any soil that is excavated from the site prior to disposal to ascertain if contamination remains. The soil must be treated, stored and disposed of by the owner in accordance with applicable local, state and federal law.

In the event the barrier overlying the contaminated soil is removed or replaced, the replacement barrier must be equally impervious. Any replacement barrier will be subject to the same maintenance and inspection guidelines as outlined in this Maintenance Plan unless indicated otherwise by the DNR or its successor.

The property owner, in order to maintain the integrity of the barrier, will maintain a copy of this Maintenance Plan at the site; or, if there is no acceptable place to keep it at the site (for example, no building is present), at the address of the property owner and make it available to all interested parties (i.e. on-site employees, contractors, future property owners, etc.) for viewing.

Prohibition of Activities and Notification of DNR Prior to Actions Affecting a Cover/Barrier

The following activities are prohibited on any portion of the property where the barrier is required as shown on the attached map, unless prior written approval has been obtained from the WDNR:

- 1) removal of the existing barrier;
- 2) replacement with another barrier;
- 3) excavating or grading of the land surface;
- 4) filling on capped or paved areas;
- 5) plowing for agricultural cultivation;
- 6) construction or placement of a building or other structure; or
- 7) changing the use or occupancy of the property to a residential exposure setting, which may include certain uses, such as single or multiple family residences, a school, day care, senior center, hospital, or similar residential exposure settings.

If removal, replacement or other changes to a cover, or a building which is acting as a cover, are considered, the property owner will contact WDNR at least 45 days before taking such an action, to determine whether further action may be necessary to protect human health, safety, or welfare or the environment, in accordance with s. NR 727.07, Wis. Adm. Code.

Amendment or Withdrawal of Maintenance Plan

This Maintenance Plan can be amended or withdrawn by the property owner and its successors with the written approval of DNR.

Contact Information

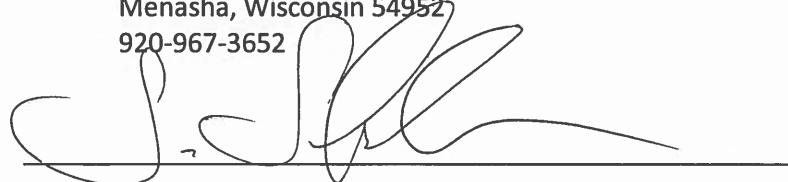
(Form 4400-202, Attachment D, Part 1.) Contact Information, including the name, address and phone number of the individual or facility who will be conducting the maintenance.)

March 2018

Site Owner: Samuel Schroeder

City of Menasha
100 Main Street
Menasha, Wisconsin 54952
920-967-3652

Signature:



Site Operator: Luke Bergstrom
Multistorage, LLC
1 Neenah Center, Suite 700
Neenah, Wisconsin 54956
920-585-0206

Signature: 

Consultant: Kurt McClung
KEY Engineering Group, Ltd.
735 North Water Street, Suite 510
Milwaukee, Wisconsin 53202
414 225-0592

DNR: Kevin McKnight
Oshkosh Service Center
625 E County Y, Suite 700
Oshkosh, Wisconsin 54901
920 424-7890

D.2 Location Map(s)

Include a location map which shows:

- (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 of Cover/Barrier

Include one or more photographs documenting the condition and extent of the cover/barrier/building/slab at the time of the closure request. Pertinent features must be visible and discernible. Include a title on each photograph, which identifies the site name and location of the feature, and the date on which the photograph was taken.

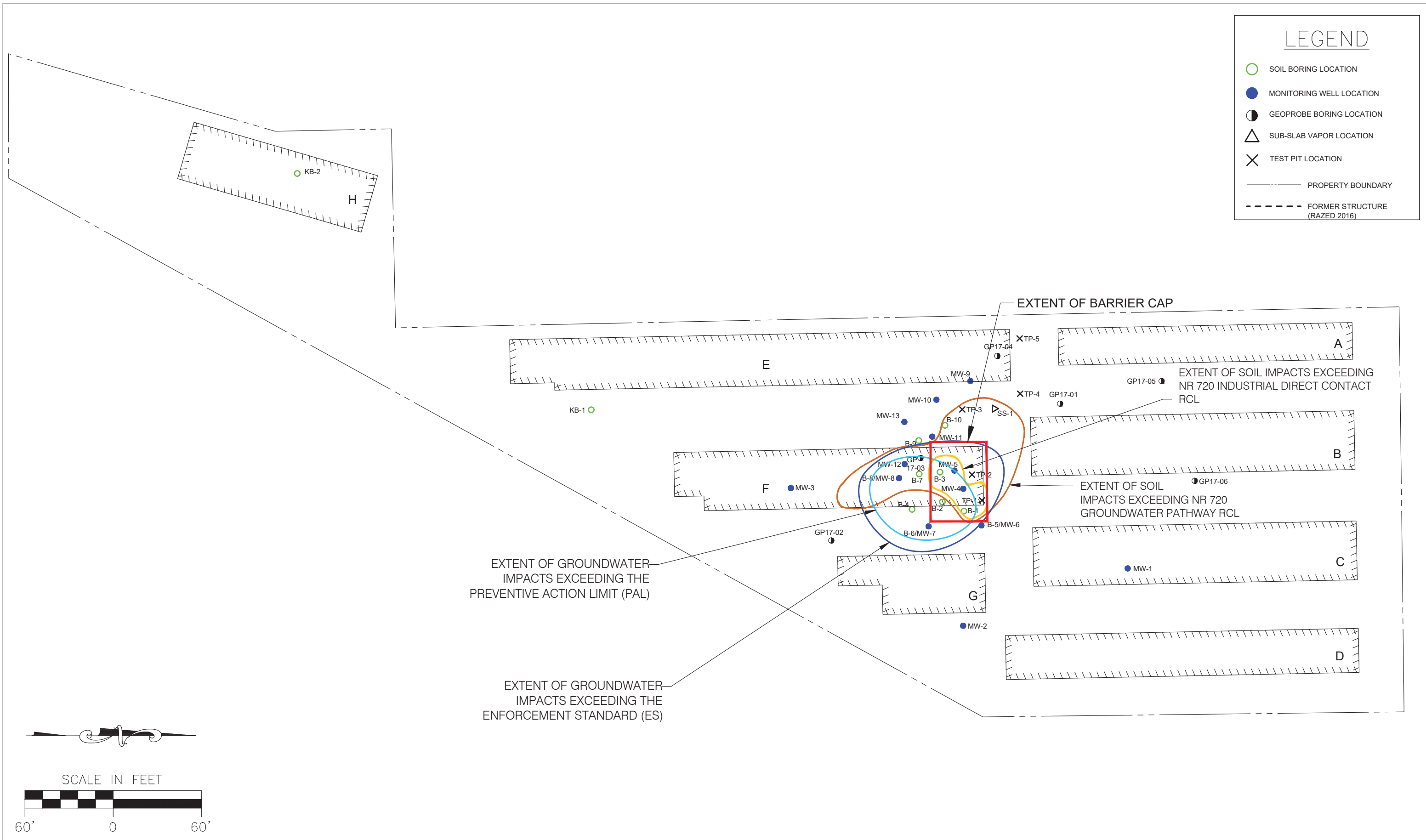
D.4 Continuing Obligations Inspection and Maintenance Log

Use DNR Fillable Form: Form 4400-305



LEGEND

- SOIL BORING LOCATION
- MONITORING WELL LOCATION
- GEOPROBE BORING LOCATION
- △ SUB-SLAB VAPOR LOCATION
- × TEST PIT LOCATION
- — — — — PROPERTY BOUNDARY
- - - - - FORMER STRUCTURE (RAZED 2016)



DESIGNED BY KMJ	DATE 4/27/2018
DRAWN BY RLH	PROJECT SET: 1608-0053-0002
APPROVED BY KWW	SHEET NO.
CADFILE XREF LMAN	

FIGURE D.2
SURFACE BARRIER INSPECTION AREA
REALTY OPUS, 867 W. VALLEY RD
MENASHA, WISCONSIN

KEY ENGINEERING GROUP LTD.
 735 NORTH WATER STREET, SUITE 510
 MILWAUKEE, WI 53202
 414.224.8300 (tel) - 414.224.8383 (fax)

F:\Work in Progress\1608-0053 Opus Menasha\CAD\Jan 2018 Report\Base Map_Realty Opus.dwg Apr 27, 2018 - 3:43pm



PHOTOGRAPH 1:

Surface Barrier, facing SW



PHOTOGRAPH 2:

Surface Barrier, facing S



PHOTOGRAPH 3:

Surface Barrier, facing SE

Directions: In accordance with s. NR 727.05 (1) (b) 3., Wis. Adm. Code, use of this form for documenting the inspections and maintenance of certain continuing obligations is required. 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.]. When using this form, identify the condition that is being inspected. See the closure approval letter for this site for requirements regarding the submittal of this form to the Department of Natural Resources. A copy of this inspection log is required to be maintained either on the property, or at a location specified in the closure approval letter. Do NOT delete previous inspection results. This form was developed to provide a continuous history of site inspection results. The Department of Natural Resources project manager is identified in the closure letter. The project manager may also be identified from the database, BRRTS on the Web, at <http://dnr.wi.gov/botw/SetUpBasicSearchForm.do>, by searching for the site using the BRRTS ID number, and then looking in the "Who" section.

Activity (Site) Name Realty Opus Property	BRRTS No. 02-71-555288
---	----------------------------------

Inspections are required to be conducted (see closure approval letter): <input checked="" type="radio"/> annually <input type="radio"/> semi-annually <input type="radio"/> other – specify _____	When submittal of this form is required, submit the form electronically to the DNR project manager. An electronic version of this filled out form, or a scanned version may be sent to the following email address (see closure approval letter): <p style="text-align: center;">Kevin.McKnight@wisconsin.gov</p>
--	--

Inspection Date	Inspector Name	Item	Describe the condition of the item that is being inspected	Recommendations for repair or maintenance	Previous recommendations implemented?	Photographs taken and attached?
12/07/2017	Kurt McClung	<input type="checkbox"/> monitoring well <input checked="" type="checkbox"/> cover/barrier <input type="checkbox"/> vapor mitigation system <input type="checkbox"/> other:	Surface Cap	None	<input type="radio"/> Y <input type="radio"/> N	<input checked="" type="radio"/> Y <input type="radio"/> N
		<input type="checkbox"/> monitoring well <input type="checkbox"/> cover/barrier <input type="checkbox"/> vapor mitigation system <input type="checkbox"/> other:			<input type="radio"/> Y <input type="radio"/> N	<input type="radio"/> Y <input type="radio"/> N
		<input type="checkbox"/> monitoring well <input type="checkbox"/> cover/barrier <input type="checkbox"/> vapor mitigation system <input type="checkbox"/> other:			<input type="radio"/> Y <input type="radio"/> N	<input type="radio"/> Y <input type="radio"/> N
		<input type="checkbox"/> monitoring well <input type="checkbox"/> cover/barrier <input type="checkbox"/> vapor mitigation system <input type="checkbox"/> other:			<input type="radio"/> Y <input type="radio"/> N	<input type="radio"/> Y <input type="radio"/> N
		<input type="checkbox"/> monitoring well <input type="checkbox"/> cover/barrier <input type="checkbox"/> vapor mitigation system <input type="checkbox"/> other:			<input type="radio"/> Y <input type="radio"/> N	<input type="radio"/> Y <input type="radio"/> N
		<input type="checkbox"/> monitoring well <input type="checkbox"/> cover/barrier <input type="checkbox"/> vapor mitigation system <input type="checkbox"/> other:			<input type="radio"/> Y <input type="radio"/> N	<input type="radio"/> Y <input type="radio"/> N

{Click to Add/Edit Image}

Date added: 01/12/2018



Title: Facing SW

{Click to Add/Edit Image}

Date added: 01/12/2018



Title: Facing S

{Click to Add/Edit Image}

Date added: 01/12/2018



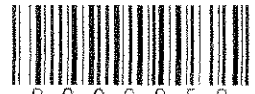
Title: Facing SE

E. Monitoring Well Information

Not Applicable--All Monitoring Wells Are Abandoned

F. Source Legal Documents

- F.1. Deed
- F.2. Certified Survey Map
- F.3. Verification of Zoning
- F.4. Signed Statement



8 3 0 6 2 5 9
Tx:4221858

1724185

REGISTER'S OFFICE
WINNEBAGO COUNTY, WI
RECORDED ON
09/29/2016 2:05 PM

CHRISTOPHER LARSON
DEPUTY REGISTER OF DEEDS

RECORDING FEE 30.00
TRANSFER FEE 525.00
PAGES: 1

State Bar of Wisconsin Form 1-2003
WARRANTY DEED

Document Number _____ Document Name _____

THIS DEED, made between Realty Opus Inc., a Wisconsin corporation

("Grantor," whether one or more), and City of Menasha, a Wisconsin municipal corporation

("Grantee," whether one or more).

Grantor for a valuable consideration, conveys to Grantee the following described real estate, together with the rents, profits, fixtures and other appurtenant interests, in Winnebago County, State of Wisconsin ("Property") (if more space is needed, please attach addendum):

Lot One (1) Certified Survey Map No. 3878, filed in the Office of the Register of Deeds for Winnebago County, Wisconsin on December 11, 1997, in Volume 1 on Page 3878, as Document No. 991791, said Survey Map being part of the Northwest 1/4 of the Southeast 1/4 and part of the Northeast 1/4 of the Southwest 1/4 of Section 2, Township 20 North, Range 17 East, City of Menasha, Winnebago County, Wisconsin.

Recording Area _____

Name and Return Address
City Clerk
140 Main Street
Menasha, WI 54952

Charge

704-0753

Parcel Identification Number (PIN)

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

Grantor warrants that the title to the Property is good, indefeasible, in fee simple and free and clear of encumbrances except: municipal and zoning ordinances, recorded easements for public utilities serving the property, recorded building and use restrictions and covenants, rights of others reserved by instrument Recorded on May 26, 1959 in Volume 904, Page 157, limited access provision by instrument Recorded on December 2, 1983 as Document No. 602187, and will warrant and defend the same.

Dated 9/27/16

REALTY OPUS INC.

(SEAL) Judy Reppert (SEAL)
* _____ * Judy Reppert, President

(SEAL) _____ (SEAL)
* _____ *

AUTHENTICATION

Signature(s) _____

authenticated on _____

* _____

TITLE: MEMBER STATE BAR OF WISCONSIN

(If not, _____
authorized by Wis. Stat. § 706.06)

THIS INSTRUMENT DRAFTED BY:

Attorney Douglas D. Hahn
Appleton, WI 54912-0785

ACKNOWLEDGMENT

STATE OF WISCONSIN)

) ss.

WINNEBAGO COUNTY)

Personally came before me on 9/27/2016,
the above-named Judy Reppert

to me known to be the person(s) who executed the foregoing instrument and acknowledged the same.

Pamela A. Captain
* PAMELA A. CAPTAIN

Notary Public, State of WISCONSIN

My commission (is permanent) (expires: _____)

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

NOTE: THIS IS A STANDARD FORM. ANY MODIFICATION TO THIS FORM SHOULD BE CLEARLY IDENTIFIED.

WARRANTY DEED

©2003 STATE BAR OF WISCONSIN

FORM NO. 1-2003

*Type name below signatures.

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G

DOCUMENT NO.

WARRANTY DEED
STATE OF WISCONSIN - FORM 2
THIS SPACE RESERVED FOR RECORDING DATA

604407

This indenture, Made this 12th day of January
A. D., 1984, between Kools Brothers, Inc.
a Corporation duly organized and existing under and by
virtue of the laws of the State of Wisconsin, located at Menasha
Wisconsin, party of the first part, and Realty Opus, Inc.

Register's Office
Winnebago County, Wis.
Received for record
this 16th Day of
January
A. D., 1984
1:40 o'clock PM

W. J. Dabust
REGISTER OF DEEDS

RETURN TO
DMW+L (Kelly)

part Y of the second part.
Witnesseth, That the said party of the first part, for and in consideration of the sum of One Dollar and other valuable consideration to it paid by the said part Y 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, alien, convey, and confirm unto the said part Y of the second part, its heirs and assigns forever, the following described real estate, situated in the County of Winnebago, State of Wisconsin, to-wit:

LEGAL DESCRIPTION ATTACHED

TRANSFER

\$ 558.00
FEE

(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 Y of the second part, and to its heirs and assigns FOREVER.

And the said Kools Brothers, Inc. party of the first part, for itself and its successors, does covenant, grant, bargain and agree to and with the said part Y of the second part, its heirs and assigns, that at the time of the sealing 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 easements, covenants, conditions and restrictions of record

and that the above bargained premises in the quiet and peaceable possession of the said part Y of the second part, its 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 Kools Brothers, Inc. party of the first part, has caused these presents to be signed by Robert M. Kools its President, and countersigned by Irving G. Curry, III its Secretary, at Kaukauna, Wisconsin, and its corporate seal to be hereunto affixed, this 12th day of January A. D., 1984

SIGNED AND SEALED IN PRESENCE OF

Kools Brothers, Inc.

Robert M. Kools
Corporate Name
President

Robert M. Kools
COUNTERSIGNED:
Irving G. Curry, III
Irving G. Curry, III Secretary

STATE OF WISCONSIN

Outagamie County, } ss.

Personally came before me, this 12th day of January, A. D., 1984, Robert M. Kools President, and Irving G. Curry, III 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 they executed the foregoing instrument as such officers as the deed of said Corporation, by its authority.

THIS INSTRUMENT WAS DRAFTED BY
Dennis M. Jydeven Attorney at Law
Kaukauna, WI 54130
Notary Public, Outagamie County, Wis.
My commission (expires) May 10, 1987



(Section 29.31 (1) of the Wisconsin Statutes provides that all instruments to be recorded shall have plainly printed or typewritten thereon the names of the grantors, grantees, witnesses, and date. Section 29.313 similarly requires that the name of the person who, as governmental agency which, drafted such instrument, shall be printed, typewritten, stamped or written thereon in a legible manner.)

That part of the North East 1/4 of the SOUTH WEST 1/4 of Section Two (2) Township Twenty (20) North, of Range Seventeen (17) East, in the Fourth Ward, City of Menasha, described as follows, viz:- Commencing at a point on the South right-of-way line of County Trunk Highway "P" that is One Hundred Fourteen (114) feet west of and Thirty-three (33) feet south of the Northeast corner of said North East 1/4 of the South West 1/4; thence west, along the South right-of-way line of said Highway, One Hundred Eighty (180) feet; thence south, Seven Hundred Seventy-three (773) feet, to the North right-of-way line of the Chicago, Milwaukee, St. Paul and Pacific Railroad Company; thence northeasterly, along the North right-of-way line of said Railroad, Three Hundred Sixty-four and Seven-tenths (364.7) feet; thence north, Four Hundred Fifty-six and Thirty-six Hundredths (456.36) feet, to the place of beginning.

That part of the West Sixty (60) feet of the East One Hundred Fourteen (114) feet of the North East 1/4 of the SOUTH WEST 1/4 of Section Two (2) Township Twenty (20) North, of Range Seventeen (17) East, in the Fourth Ward, City of Menasha, lying northwesterly of the Northwesterly right-of-way line of the Chicago, Milwaukee, St. Paul and Pacific Railroad Company, excepting therefrom that portion thereof contained within the limits of County Trunk Highway "P".

That part of the North West 1/4 of the SOUTH EAST 1/4 and of the North East 1/4 of the SOUTH WEST 1/4, all of Section Two (2) Township Twenty (20) North, of Range Seventeen (17) East, and now in the Fourth Ward, City of Menasha, described as follows, viz:- Commencing at the point of intersection of the North line of said North West 1/4 of South East 1/4 with the Westerly line of the right of way of the Chicago, Milwaukee, St. Paul and Pacific Railroad Company, thence west, along said North line and the North line of said North East 1/4 of the South West 1/4, Two Hundred Seventeen and Ninety-eight Hundredths (217.98) feet, thence south at right angles to said North line, to the Westerly line of said right of way, thence northeasterly, along the Westerly line of said right of way to the place of beginning.

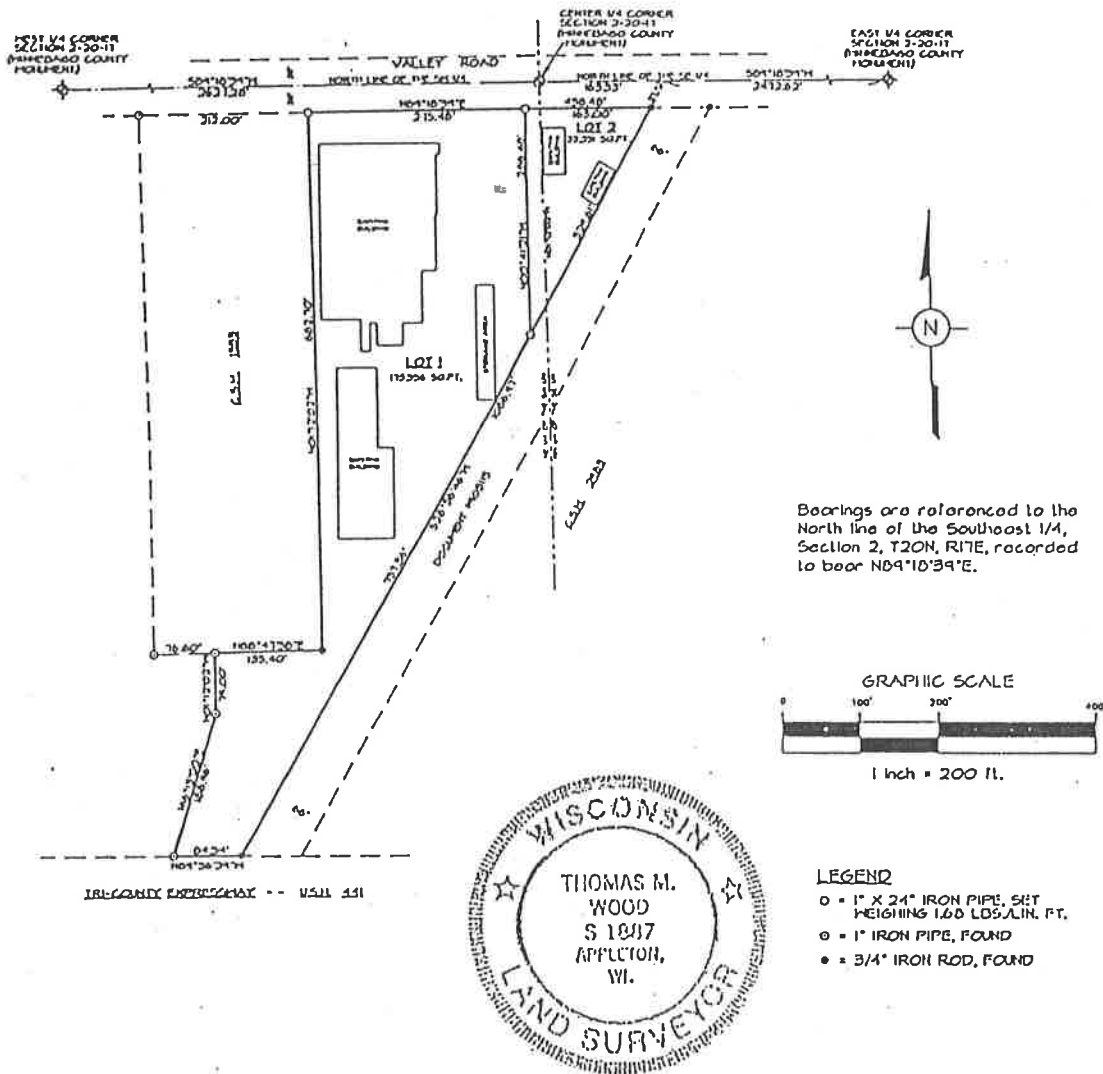
That part of the North East 1/4 of the SOUTH WEST 1/4 of Section Two (2) Township Twenty (20) North, of Range Seventeen (17) East, in the Fourth Ward, City of Menasha, described as follows, viz:- Commencing on the North line of said South West 1/4, at a point Two Hundred Ninety-four (294) feet west of the Northeast corner thereof; thence south, parallel with the East line of said South West 1/4, Seven Hundred Fifteen and Seven-tenths (715.7) feet, the place of beginning; thence west, at right angles to the East line of said South West 1/4, One Hundred Thirty-five and Four-tenths (135.4) feet; thence south, parallel with the East line of said South West 1/4, Seventy-nine (79) feet; thence south Sixteen (16) degrees Thirty-six (36) minutes west, Two Hundred Twenty (220) feet; thence south Two (2) degrees Fifty-five (55) minutes west, One Hundred Sixty-eight and Three-tenths (168.3) feet, to the Northwesterly line of the right of way of the Chicago, Milwaukee, St. Paul and Pacific Railway Company; thence north Twenty-nine (29) degrees Twenty (20) minutes east, along the Northwesterly line of said right of way, Four Hundred Twenty-two and One-tenth (422.1) feet, to a point that is Two Hundred Ninety-four (294) feet west of the East line of said South West 1/4; thence north, parallel with, and Two Hundred Ninety-four (294) feet west of, the East line of said South West 1/4, Ninety (90) feet, to the place of beginning, excepting therefrom that portion thereof heretofore conveyed to Winnebago County by Deed recorded as Document No. 601515.

Together with an easement for right of way purposes over a strip of land 20 feet wide lying immediately to the North of and abutting said premises, and together with the right to use, in common with the adjoining land owner, the spur track of the Chicago, Milwaukee, St. Paul and Pacific Railway lying along the westerly boundary of said premises, as provided in Warranty Deed dated November 12, 1958, recorded May 26, 1959 in Volume 904 of Records at page 157, as Document No. 265761.

WINNEBAGO COUNTY CERTIFIED SURVEY MAP NO. _____

Part of the Northwest 1/4 of the Southeast 1/4, and part of the Northeast 1/4 of the Southwest 1/4, Section 2, T20N, R17E, City of Menasha, Winnebago County, Wisconsin.

Prepared for: Appleton Steel Works
1212 Wisconsin Ct.
Appleton, WI 54911



Bearings are referenced to the North line of the Southeast 1/4, Section 2, T20N, R17E, recorded to bear N09°10'39"E.



- LEGEND**
- = 1" X 24" IRON PIPE, SET HEIGHTING 160 LBS/LIN. FT.
 - = 1" IRON PIPE, FOUND
 - = 3/4" IRON ROD, FOUND

SURVEYOR'S CERTIFICATE

I, THOMAS M. WOOD, REGISTERED WISCONSIN LAND SURVEYOR, CERTIFY THAT I HAVE SURVEYED, DIVIDED AND MAPPED PART OF THE NORTHWEST 1/4 OF THE SOUTHEAST 1/4, AND PART OF THE NORTHEAST 1/4 OF THE SOUTHWEST 1/4, ALL IN SECTION 2, T20N, R17E, CITY OF MENASHA, WINNEBAGO COUNTY, WISCONSIN, DESCRIBED AS FOLLOWS; COMMENCING AT THE EAST 1/4 CORNER OF SAID SECTION 2; THENCE S09°10'39"W, 2472.62 FEET; THENCE S20°56'46"W, 37.92 FEET TO THE POINT OF BEGINNING; THENCE CONTINUING S20°56'46"W, 1006.97 FEET; THENCE N09°56'39"W, 04.54 FEET; THENCE N16°13'00"E, 100.96 FEET; THENCE N01°12'02"W, 79.00 FEET; THENCE N00°47'50"E, 135.40 FEET; THENCE N01°12'02"W, 602.70 FEET; THENCE N09°10'39"E, 130.10 FEET TO THE POINT OF BEGINNING.

THAT I HAVE MADE SUCH SURVEY, MAP AND LAND DIVISION AS SHOWN HEREON, UNDER THE DIRECTION OF APPLETON STEEL WORKS.

THAT THIS MAP IS A CORRECT REPRESENTATION OF THE EXTERIOR BOUNDARY LINES OF THE LAND SURVEYED.

THAT I HAVE FULLY COMPLIED WITH THE PROVISIONS OF CHAPTER 236.31 OF THE WISCONSIN STATUTES AND THE SUBDIVISION REGULATIONS OF THE CITY OF MENASHA, WINNEBAGO COUNTY, WISCONSIN, IN SURVEYING, DIVIDING AND MAPPING THE SAME.

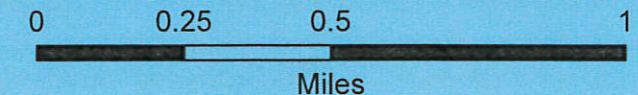
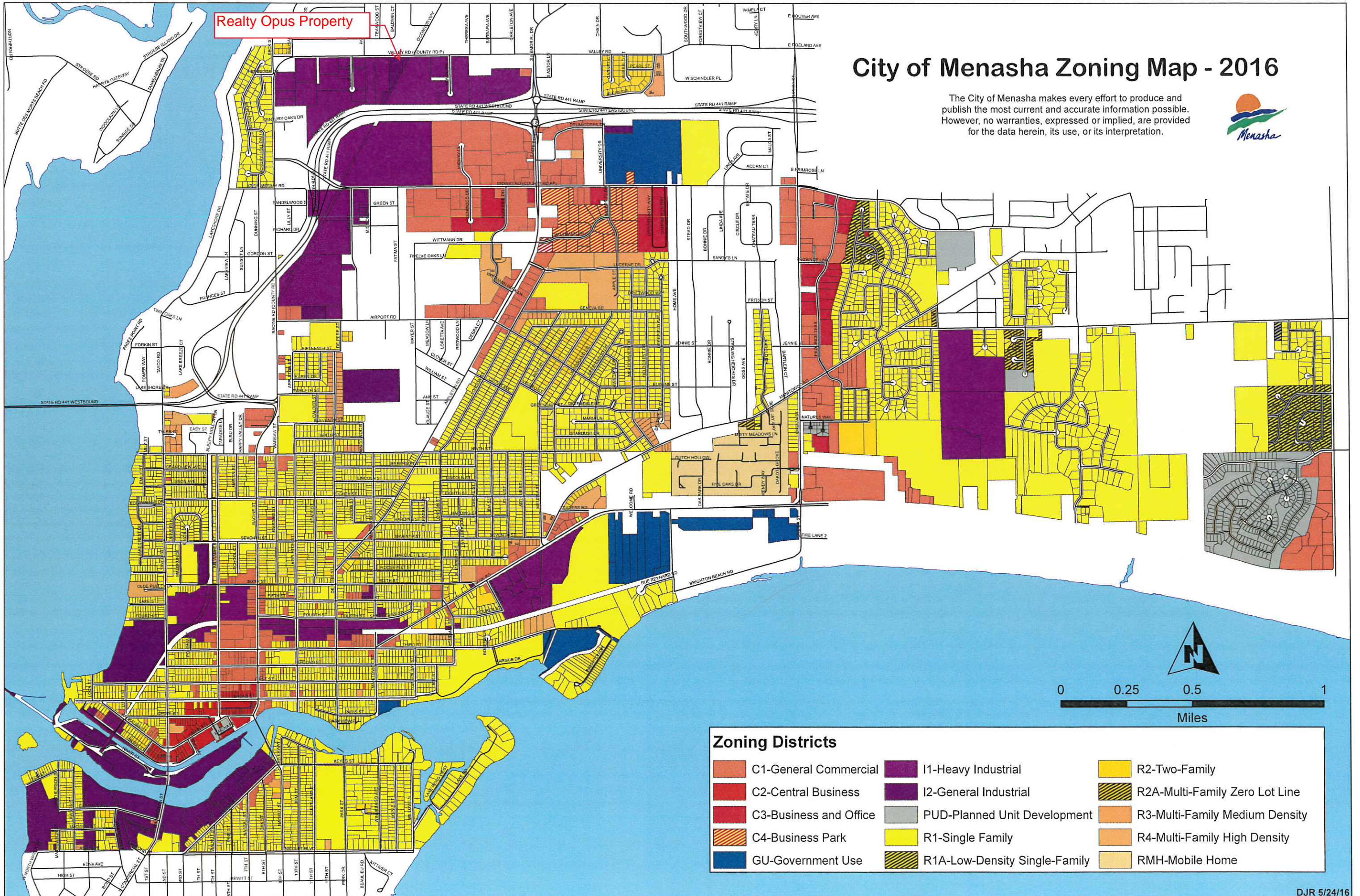
Thomas M. Wood February 5, 1997
THOMAS M. WOOD DATE

HARRIS & ASSOCIATES, INC.
CADASTRAL ENGINEERS AND LAND SURVEYORS
2110 NORTH KALE ST., APPLETON, WI 54911
TEL: (414) 733-0377 FAX: (414) 733-4101

Realty Opus Property

City of Menasha Zoning Map - 2016

The City of Menasha makes every effort to produce and publish the most current and accurate information possible. However, no warranties, expressed or implied, are provided for the data herein, its use, or its interpretation.



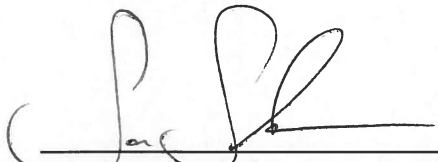
Zoning Districts					
	C1-General Commercial		I1-Heavy Industrial		R2-Two-Family
	C2-Central Business		I2-General Industrial		R2A-Multi-Family Zero Lot Line
	C3-Business and Office		PUD-Planned Unit Development		R3-Multi-Family Medium Density
	C4-Business Park		R1-Single Family		R4-Multi-Family High Density
	GU-Government Use		R1A-Low-Density Single-Family		RMH-Mobile Home

STATEMENT OF LEGAL DESCRIPTION ACCURACY

FOR

City of Menasha Tax/Parcel ID # 4-00753-00
(Winnebago County Tax/Parcel ID # 704-0753-00)
Realty Opus Property
867 Valley Road
Menasha, Wisconsin 54952
BRRTS # 02-71-555288

A deed obtained from the Winnebago County Register of Deeds Office provided the legal description of the above-mentioned property. To the best of my knowledge, the legal description provided below is correct.



Samuel Schroeder
Principal Planner
City of Menasha

1/15/18

Date

LEGAL DESCRIPTION:

Lot One (1) Certified Survey Map No. 3878, filed in the Office of the Register of Deeds for Winnebago County, Wisconsin on December 11, 1997, in Volume 1 on Page 3878, as Document No. 991791, said Survey Map being part of the Northwest ¼ of the Southeast ¼ and part of the Northeast ¼ of the Southwest ¼ of Section 2, Township 20 North, Range 17 East, City of Menasha, Winnebago County, Wisconsin.

G. Notifications to Owners of Affected Properties

Not Applicable-No Other Affected Parties