

Notice: Use this form to request a **written response (on agency letterhead)** from the Department of Natural Resources (DNR) regarding technical assistance, a post-closure change to a site, a specialized agreement or liability clarification for Property with known or suspected environmental contamination. A fee will be required as is authorized by s. 292.55, Wis. Stats., and NR 749, Wis. Adm. Code., unless noted in the instructions below. Personal information collected will be used for administrative purposes and may be provided to requesters to the extent required by Wisconsin's Public Records law [ss. 19.31 - 19.39, Wis. Stats.].

Definitions

"Property" refers to the subject Property that is perceived to have been or has been impacted by the discharge of hazardous substances.

"Liability Clarification" refers to a written determination by the Department provided in response to a request made on this form. The response clarifies whether a person is or may become liable for the environmental contamination of a Property, as provided in s. 292.55, Wis. Stats.

"Technical Assistance" refers to the Department's assistance or comments on the planning and implementation of an environmental investigation or environmental cleanup on a Property in response to a request made on this form as provided in s. 292.55, Wis. Stats.

"Post-closure modification" refers to changes to Property boundaries and/or continuing obligations for Properties or sites that received closure letters for which continuing obligations have been applied or where contamination remains. Many, but not all, of these sites are included on the GIS Registry layer of RR Sites Map to provide public notice of residual contamination and continuing obligations.

Select the Correct Form

This form should be used to request the following from the DNR:

- Technical Assistance
- Liability Clarification
- Post-Closure Modifications
- Specialized Agreements (tax cancellation, negotiated agreements, etc.)

Do not use this form if one of the following applies:

- Request for an **off-site liability exemption or clarification** for Property that has been or is perceived to be contaminated by one or more hazardous substances that originated on another Property containing the source of the contamination. Use DNR's Off-Site Liability Exemption and Liability Clarification Application Form 4400-201.
- Submittal of an Environmental Assessment for the **Lender Liability Exemption**, s 292.21, Wis. Stats., **if no response or review by DNR is requested**. Use the Lender Liability Exemption Environmental Assessment Tracking Form 4400-196.
- Request for an **exemption to develop on a historic fill site** or licensed landfill. Use DNR's Form 4400-226 or 4400-226A.
- **Request for closure** for Property where the investigation and cleanup actions are completed. Use DNR's Case Closure - GIS Registry Form 4400-202.

All forms, publications and additional information are available on the internet at: dnr.wi.gov/topic/Brownfields/Pubs.html.

Instructions

1. Complete sections 1, 2, 6 and 7 for all requests. Be sure to provide adequate and complete information.
2. Select the type of assistance requested: Section 3 for technical assistance or post-closure modifications, Section 4 for a written determination or clarification of environmental liabilities; or Section 5 for a specialized agreement.
3. Include the fee payment that is listed in Section 3, 4, or 5, unless you are a "Voluntary Party" enrolled in the Voluntary Party Liability Exemption Program **and** the questions in Section 2 direct otherwise. Information on to whom and where to send the fee is found in Section 8 of this form.
4. Send the completed request, supporting materials and the fee to the appropriate DNR regional office where the Property is located. See the map on the last page of this form. A paper copy of the signed form and all reports and supporting materials shall be sent with an electronic copy of the form and supporting materials on a compact disk. For electronic document submittal requirements see: <http://dnr.wi.gov/files/PDF/pubs/rr/RR690.pdf>

The time required for DNR's determination varies depending on the complexity of the site, and the clarity and completeness of the request and supporting documentation.

Technical Assistance, Environmental Liability Clarification or Post-Closure Modification Request

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Section 1. Contact and Recipient Information

Requester Information

This is the person requesting technical assistance or a post-closure modification review, that his or her liability be clarified or a specialized agreement and is identified as the requester in Section 7. DNR will address its response letter to this person.

Last Name McClung	First Kurt	MI	Organization/ Business Name SET Engineering, LLC
Mailing Address 735 North Water Street, Suite 510			City Milwaukee
			State WI
			ZIP Code 53202
Phone # (include area code) (414) 225-0592	Fax # (include area code)	Email kmclung@setenv.com	

The requester listed above: (select all that apply)

- Is currently the owner
 Is considering selling the Property
 Is renting or leasing the Property
 Is considering acquiring the Property
 Is a lender with a mortgagee interest in the Property
 Other. Explain the status of the Property with respect to the applicant:
 Consultant

Contact Information (to be contacted with questions about this request)

Select if same as requester

Contact Last Name McClung	First Kurt	MI	Organization/ Business Name SET Engineering, LLC
Mailing Address 735 North Water Street, Suite 510			City Milwaukee
			State WI
			ZIP Code 53202
Phone # (include area code) (414) 225-0592	Fax # (include area code)	Email kmclung@setenv.com	

Environmental Consultant (if applicable)

Contact Last Name McClung	First Kurt	MI	Organization/ Business Name SET Engineering, LLC
Mailing Address 735 North Water Street, Suite 510			City Milwaukee
			State WI
			ZIP Code 53202
Phone # (include area code) (414) 225-0592	Fax # (include area code)	Email kmclung@setenv.com	

Attorney (if applicable)

Contact Last Name Berzowski	First Michael	MI	Organization/ Business Name
Mailing Address 1411 N Summit Ave			City Oconomowoc
			State WI
			ZIP Code 53066
Phone # (include area code) (262) 468-4928	Fax # (include area code)	Email Mberzowski@hotmail.com	

Property Owner (if different from requester)

Contact Last Name Higgins	First Mike	MI	Organization/ Business Name Complete Recycling Services, LLC
Mailing Address 2529 East Norwich Avenue			City St Francis
			State WI
			ZIP Code 53235
Phone # (include area code)	Fax # (include area code)	Email mhiggins@completerecyclingservices.com	

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Section 2. Property Information

Property Name Mid-America Steel Drum company Inc/Kitzinger		FID No. (if known) 241063570	
BRRTS No. (if known) 0241560089	Parcel Identification Number 5849973001		
Street Address 2529 East Norwich Avenue	City St. Francis	State WI	ZIP Code 53235
County Milwaukee	Municipality where the Property is located <input checked="" type="radio"/> City <input type="radio"/> Town <input type="radio"/> Village of St. Francis	Property is composed of: <input type="radio"/> Single tax parcel <input type="radio"/> Multiple tax parcels	Property Size Acres 4.78

1. Is a response needed by a specific date? (e.g., Property closing date) Note: Most requests are completed within 60 days. Please plan accordingly.

No Yes

Date requested by: _____

Reason:

2. Is the "Requester" enrolled as a Voluntary Party in the Voluntary Party Liability Exemption (VPLE) program?

No. **Include the fee that is required for your request in Section 3, 4 or 5.**

Yes. **Do not include a separate fee.** This request will be billed separately through the VPLE Program.

Fill out the information in Section 3, 4 or 5 which corresponds with the type of request:

Section 3. Technical Assistance or Post-Closure Modifications;

Section 4. Liability Clarification; or Section 5. Specialized Agreement.

Section 3. Request for Technical Assistance or Post-Closure Modification

Select the type of technical assistance requested: [**Numbers in brackets are for WI DNR Use**]

- No Further Action Letter (NFA) (Immediate Actions) - NR 708.09, [183] - Include a fee of \$350. Use for a written response to an immediate action after a discharge of a hazardous substance occurs. Generally, these are for a one-time spill event.
- Review of Site Investigation Work Plan - NR 716.09, [135] - **Include a fee of \$700.**
- Review of Site Investigation Report - NR 716.15, [137] - **Include a fee of \$1050.**
- Approval of a Site-Specific Soil Cleanup Standard - NR 720.10 or 12, [67] - **Include a fee of \$1050.**
- Review of a Remedial Action Options Report - NR 722.13, [143] - **Include a fee of \$1050.**
- Review of a Remedial Action Design Report - NR 724.09, [148] - **Include a fee of \$1050.**
- Review of a Remedial Action Documentation Report - NR 724.15, [152] - **Include a fee of \$350**
- Review of a Long-term Monitoring Plan - NR 724.17, [25] - **Include a fee of \$425.**
- Review of an Operation and Maintenance Plan - NR 724.13, [192] - **Include a fee of \$425.**

Other Technical Assistance - s. 292.55, Wis. Stats. [97] (For request to build on an abandoned landfill use Form 4400-226)

- Schedule a Technical Assistance Meeting - **Include a fee of \$700.**
- Hazardous Waste Determination - **Include a fee of \$700.**
- Other Technical Assistance - **Include a fee of \$700.** Explain your request in an attachment.

Post-Closure Modifications - NR 727, [181]

- Post-Closure Modifications: Modification to Property boundaries and/or continuing obligations of a closed site or Property; sites may be on the GIS Registry. This also includes removal of a site or Property from the GIS Registry. **Include a fee of \$1050, and:**
 - Include a fee of \$300 for sites with residual soil contamination; and
 - Include a fee of \$350 for sites with residual groundwater contamination, monitoring wells or for vapor intrusion continuing obligations.

Attach a description of the changes you are proposing, and documentation as to why the changes are needed (if the change to a Property, site or continuing obligation will result in revised maps, maintenance plans or photographs, those documents may be submitted later in the approval process, on a case-by-case basis).

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Section 4. Request for Liability Clarification

Select the type of liability clarification requested. Use the available space given or attach information, explanations, or specific questions that you need answered in DNR's reply. Complete Sections 6 and 7 of this form. **[Numbers in brackets are for DNR Use]**

"Lender" liability exemption clarification - s. 292.21, Wis. Stats. [686]

❖ **Include a fee of \$700.**

Provide the following documentation:

- (1) ownership status of the real Property, and/or the personal Property and fixtures;
- (2) an environmental assessment, in accordance with s. 292.21, Wis. Stats.;
- (3) the date the environmental assessment was conducted by the lender;
- (4) the date of the Property acquisition; for foreclosure actions, include a copy of the signed and dated court order confirming the sheriff's sale.
- (5) documentation showing how the Property was acquired and the steps followed under the appropriate state statutes.
- (6) a copy of the Property deed with the correct legal description; and,
- (7) the Lender Liability Exemption Environmental Assessment Tracking Form (Form 4400-196).
- (8) If no sampling was done, please provide reasoning as to why it was **not** conducted. Include this either in the accompanying environmental assessment or as an attachment to this form, and cite language in s. 292. 21(1)(c)2.,h.-i., Wis. Stats.:
 - h. The collection and analysis of representative samples of soil or other materials in the ground that are suspected of being contaminated based on observations made during a visual inspection of the real Property or based on aerial photographs, or other information available to the lender, including stained or discolored soil or other materials in the ground and including soil or materials in the ground in areas with dead or distressed vegetation. The collection and analysis shall identify contaminants in the soil or other materials in the ground and shall quantify concentrations.
 - i. The collection and analysis of representative samples of unknown wastes or potentially hazardous substances found on the real Property and the determination of concentrations of hazardous waste and hazardous substances found in tanks, drums or other containers or in piles or lagoons on the real Property.

"Representative" liability exemption clarification (e.g. trustees, receivers, etc.) - s. 292.21, Wis. Stats. [686]

❖ **Include a fee of \$700.**

Provide the following documentation:

- (1) ownership status of the Property;
- (2) the date of Property acquisition by the representative;
- (3) the means by which the Property was acquired;
- (4) documentation that the representative has no beneficial interest in any entity that owns, possesses, or controls the Property;
- (5) documentation that the representative has not caused any discharge of a hazardous substance on the Property; and
- (6) a copy of the Property deed with the correct legal description.

Clarification of local governmental unit (LGU) liability exemption at sites with: (select all that apply)

- hazardous substances spills - s. 292.11(9)(e), Wis. Stats. [649];
- Perceived environmental contamination - [649];
- hazardous waste - s. 292.24 (2), Wis. Stats. [649]; and/or
- solid waste - s. 292.23 (2), Wis. Stats. [649].

❖ **Include a fee of \$700, a summary of the environmental liability clarification being requested, and the following:**

- (1) clear supporting documentation showing the acquisition method used, and the steps followed under the appropriate state statute(s).
- (2) current and proposed ownership status of the Property;
- (3) date and means by which the Property was acquired by the LGU, where applicable;
- (4) a map and the ¼, ¼ section location of the Property;
- (5) summary of current uses of the Property;
- (6) intended or potential use(s) of the Property;
- (7) descriptions of other investigations that have taken place on the Property; and
- (8) (for solid waste clarifications) a summary of the license history of the facility.

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Section 4. Request for Liability Clarification (cont.)

- Lease liability clarification - s. 292.55, Wis. Stats. [646]
- ❖ **Include a fee of \$700 for a single Property, or \$1400 for multiple Properties and the information listed below:**
 - (1) a copy of the proposed lease;
 - (2) the name of the current owner of the Property and the person who will lease the Property;
 - (3) a description of the lease holder's association with any persons who have possession, control, or caused a discharge of a hazardous substance on the Property;
 - (4) map(s) showing the Property location and any suspected or known sources of contamination detected on the Property;
 - (5) a description of the intended use of the Property by the lease holder, with reference to the maps to indicate which areas will be used. Explain how the use will not interfere with any future investigation or cleanup at the Property; and
 - (6) all reports or investigations (e.g. Phase I and Phase II Environmental Assessments and/or Site Investigation Reports conducted under s. NR 716, Wis. Adm. Code) that identify areas of the Property where a discharge has occurred.

General or other environmental liability clarification - s. 292.55, Wis. Stats. [682] - Explain your request below.

- ❖ **Include a fee of \$700 and an adequate summary of relevant environmental work to date.**
- No Action Required (NAR) - NR 716.05, [682]
- ❖ **Include a fee of \$700.**
 - Use where an environmental discharge has or has not occurred, and applicant wants a DNR determination that no further assessment or clean-up work is required. Usually this is requested after a Phase I and Phase II environmental assessment has been conducted; the assessment reports should be submitted with this form. This is not a closure letter.
- Clarify the liability associated with a "closed" Property - s. 292.55, Wis. Stats. [682]
- ❖ **Include a fee of \$700.**
 - Include a copy of any closure documents if a state agency other than DNR approved the closure.

Use this space or attach additional sheets to provide necessary information, explanations or specific questions to be answered by the DNR.

Section 5. Request for a Specialized Agreement

Select the type of agreement needed. Include the appropriate draft agreements and supporting materials. Complete Sections 6 and 7 of this form. More information and model draft agreements are available at: dnr.wi.gov/topic/Brownfields/Igu.html#tabx4.

- Tax cancellation agreement - s. 75.105(2)(d), Wis. Stats. [654]
- ❖ **Include a fee of \$700, and the information listed below:**
 - (1) Phase I and II Environmental Site Assessment Reports,
 - (2) a copy of the Property deed with the correct legal description.
- Agreement for assignment of tax foreclosure judgement - s.75.106, Wis. Stats. [666]
- ❖ **Include a fee of \$700, and the information listed below:**
 - (1) Phase I and II Environmental Site Assessment Reports,
 - (2) a copy of the Property deed with the correct legal description.
- Negotiated agreement - Enforceable contract for non-emergency remediation - s. 292.11(7)(d) and (e), Wis. Stats. [630]
- ❖ **Include a fee of \$1400, and the information listed below:**
 - (1) a draft schedule for remediation; and,
 - (2) the name, mailing address, phone and email for each party to the agreement.

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Clarification or Post-Closure Modification Request

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Section 6. Other Information Submitted

Identify all materials that are included with this request.

Send both a paper copy of the signed form and all reports and supporting materials, and an electronic copy of the form and all reports, including Environmental Site Assessment Reports, and supporting materials on a compact disk.

Include one copy of any document from any state agency files that you want the Department to review as part of this request. The person submitting this request is responsible for contacting other state agencies to obtain appropriate reports or information.

- Phase I Environmental Site Assessment Report - Date: _____
- Phase II Environmental Site Assessment Report - Date: _____
- Legal Description of Property (required for all liability requests and specialized agreements)
- Map of the Property (required for all liability requests and specialized agreements)

Analytical results of the following sampled media: Select all that apply and include date of collection.

- Groundwater Soil Sediment Other medium - Describe: Groundwater Elevation Contour Maps
- Date of Collection: _____

- A copy of the closure letter and submittal materials
- Draft tax cancellation agreement
- Draft agreement for assignment of tax foreclosure judgment
- Other report(s) or information - Describe: _____

For Property with newly identified discharges of hazardous substances only: Has a notification of a discharge of a hazardous substance been sent to the DNR as required by s. NR 706.05(1)(b), Wis. Adm. Code?

- Yes - Date (if known): _____
- No

Note: The Notification for Hazardous Substance Discharge Form - Non-Emergency Only (Form 4400-225) is accessible through the RR Program Submittal Portal application. Directions for using the form and the Submittal Portal application are available on the [Submittal Portal web page](#).

Section 7. Certification by the Person who completed this form

- I am the person submitting this request (requester)
- I prepared this request for: _____
Requester Name

I certify that I am familiar with the information submitted on this request, and that the information on and included with this request is true, accurate and complete to the best of my knowledge. I also certify I have the legal authority and the applicant's permission to make this request.

Kevin McElroy
Signature

01/23/2024
Date Signed

Senior Engineer
Title

(414) 225-0592
Telephone Number (include area code)

Technical Assistance, Environmental Liability Clarification or Post-Closure Modification Request

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Section 8. DNR Contacts and Addresses for Request Submittals

Send or deliver one paper copy and one electronic copy on a compact disk of the completed request, supporting materials, and fee to the region where the property is located to the address below. Contact a [DNR regional brownfields specialist](#) with any questions about this form or a specific situation involving a contaminated property. For electronic document submittal requirements see: <http://dnr.wi.gov/files/PDF/pubs/rr/RR690.pdf>.

DNR NORTHERN REGION

Attn: RR Program Assistant
Department of Natural Resources
223 E Steinfest Rd Antigo, WI 54409

DNR NORTHEAST REGION

Attn: RR Program Assistant
Department of Natural Resources
2984 Shawano Avenue
Green Bay WI 54313

DNR SOUTH CENTRAL REGION

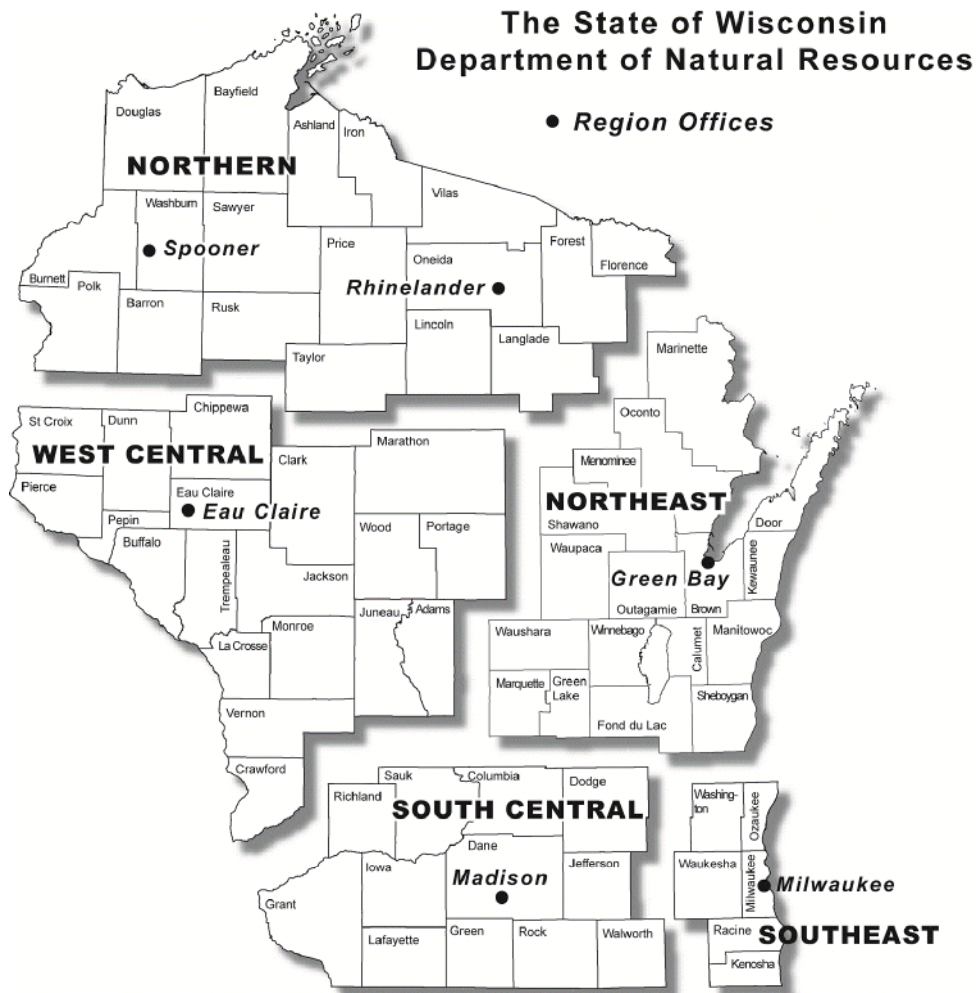
Attn: RR Program Assistant
Department of Natural Resources
3911 Fish Hatchery Road
Fitchburg WI 53711

DNR SOUTHEAST REGION

Attn: RR Program Assistant
Milwaukee DNR Office
1027 West St. Paul Ave
Milwaukee WI 53233

DNR WEST CENTRAL REGION

Attn: RR Program Assistant
Department of Natural Resources
1300 Clairemont Ave.
Eau Claire WI 54702



Note: These are the Remediation and Redevelopment Program's designated regions. Other DNR program regional boundaries may be different.

DNR Use Only			
Date Received	Date Assigned	BRRTS Activity Code	BRRTS No. (if used)
DNR Reviewer		Comments	
Fee Enclosed? <input type="radio"/> Yes <input type="radio"/> No	Fee Amount \$	Date Additional Information Requested	Date Requested for DNR Response Letter
Date Approved	Final Determination		



735 North Water Street, Suite 510
Milwaukee, Wisconsin 53202
Phone: 414-224-8300
Fax: 414-224-8383

January 23, 2024

Mr. Paul Grittner
Wisconsin Department of Natural Resources
Remediation and Redevelopment Program
1027 W St Paul Avenue
Milwaukee, Wisconsin 53233

Reference: Site Investigation Work Plan

Mid-America Steel Drum Company Inc./Kitzinger Site
2529 E Norwich Avenue, St Francis, Wisconsin
FID Number 241063570
BRRTS Number 02-41-560089

SET ENGINEERING, LLC
File Number 1703-0866

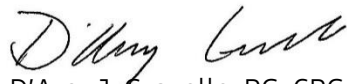
Dear Mr. Grittner:

On behalf of Complete Recycling Services, LLC., SET Engineering, LLC (SET) submits the enclosed *Site Investigation Work Plan (Work Plan)* for the Mid-America Steel Drum Company Inc./Kitzinger site located at 2529 E Norwich Avenue, St Francis, Wisconsin. SET is requesting a review and approval of this *Work Plan*. Also enclosed is the Wisconsin Department of Natural Resources Form 4400-237 and a review fee of \$700.

Sincerely,

SET ENGINEERING, LLC


Kurt McClung, PG, PE
Senior Engineer


D'Arcy J. Gravelle, PG, CPG
Principal Hydrogeologist

Enclosures: *Site Investigation Work Plan*
WDNR Form 4400-237
\$700 Review Fee

cc: Mr. Mike Higgins—Complete Recycling Services, LLC.

SITE INVESTIGATION WORK PLAN

Prepared for:

Mid-America Steel Drum Company Inc./Kitzinger Site
2529 E Norwich Avenue
St Francis, Wisconsin



SET Engineering, LLC Project No.: 1703-0866
BRRS No.: 02-41-560089
FID No.: 241063570



Prepared by:

SET Engineering, LLC
735 North Water Street, Suite 510
Milwaukee, Wisconsin 53202
Tel: 414-224-8300
www.setenv.com

January 23, 2024

Site Investigation Work Plan
Mid-America Steel Drum Company Inc./Kitzinger Site
2529 E Norwich Avenue, St Francis, Wisconsin
BRRTS Number: 02-41-560089

NR 700 SUBMITTAL CERTIFICATIONS

Hydrogeologist

"I, Kurt McClung, hereby certify that I am a hydrogeologist as that term is defined in Wisconsin Administrative Code (Wis. Admin. Code) Chapter NR 712.03 (1), am registered in accordance with the requirements of Wis. Admin. Code Chapter GHSS 2, or licensed in accordance with the requirements of Wis. Admin. Code Chapter GHSS 3, and that, to the best of my knowledge, all of the information contained in this document is correct and the document was prepared in compliance with all applicable requirements in Wis. Admin. Code Chapter NR 700 to 726."



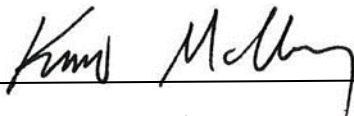
Signature

01/23/2024

Date

Professional Engineer

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



Signature title



P.E. stamp

Senior Engineer, Wisconsin PE 32615-6

Site Investigation Work Plan
Mid-America Steel Drum Company Inc./Kitzinger Site
2529 E Norwich Avenue, St Francis, Wisconsin
BRRTS Number: 02-41-560089

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Figure 7	Proposed Boring and Well Location Map



ATTACHMENTS

- Attachment 1 February 14, 2013 Responsible Party Letter Issued by WDNR
- Attachment 2 Parcel Report and Zoning Map
- Attachment 3 Scope of Investigation Activity

ACRONYMS

amsl	Above Mean Sea Level
bgs	Below Ground Surface
BRRTS	Bureau of Remediation and Redevelopment Tracking System
EC	Emerging Contaminant
ES	Wisconsin Administrative Code Chapter NR 140 Enforcement Standard
PAL	Wisconsin Administrative Code Chapter NR 140 Preventive Action Limit
PFAS	Perfluoroalkyl Substances
PID	Photoionization Detector
PVC	Polyvinyl Chloride
RAP	Remedial Action Plan
RP	Responsible Party
SET	SET Engineering, LLC
SI	Site Investigation
SIWP	Site Investigation Work Plan
USGS	United States Geological Survey
VOC	Volatile Organic Compounds
Wis. Admin. Code	Wisconsin Administrative Code
WDNR	Wisconsin Department of Natural Resources



EXECUTIVE SUMMARY

SET Engineering, LLC (SET) intends to complete a site investigation and develop a remedial action plan for the Mid-America Steel Drum Company Inc./Kitzinger site, 2529 E Norwich Avenue, St Francis, Milwaukee County, Wisconsin ("site" or "subject property"). An investigation of a release of hydrocarbons at an adjacent property identified a release of hydrocarbons at the subject property.

The site is located in a mixed residential and industrial land-use area. The site occupies 5.82 acres and is developed with an approximately 70,000 square foot, single story building and a gravel parking lot.

This *Site Investigation Work Plan* is intended to address or accomplish the following:

- Advance borings and collect soil samples for laboratory analysis,
- Install monitoring wells and piezometers,
- Collect groundwater samples for laboratory analysis,
- Define the extent of soil and groundwater impacts to the extent practicable,
- Evaluate potential for occupant exposure to vapors that intrude into buildings,
- Evaluate whether utilities are impacted or at risk as preferred migration pathways.

Upon defining the extent of impacts to soil and groundwater, and identifying pathways to receptors at risk of exposure, SET will prepare a *Site Investigation Report & Remedial Action Plan (SI/RAP)* for review and approval.



1.0 INTRODUCTION

SET intends to assist the responsible party (RP) to complete a site investigation and develop a remedial action plan for the Mid-America Steel Drum Company Inc./Kitzinger site located at 2529 E Norwich Avenue, St Francis, Milwaukee County, Wisconsin (site, or subject property). An investigation of a release of hydrocarbons from the adjacent DF site (Bureau of Remediation and Redevelopment Tracking System [BRRTS] number 02-41-097173) reported detections of hydrocarbons in soil and groundwater at the northwest corner of the subject property. Since these hydrocarbon detections indicate a release occurred at the subject site, the Wisconsin Department of Natural Resources (WDNR), issued a Responsible Party (RP) letter on February 14, 2013 to Mid-America Steel Drum Company Inc. Attachment 1 contains the Responsible Party Letter issued by WDNR for BRRTS number 02 41-560089.

This *Site Investigation Work Plan (SIWP)* presents a detailed description of planned investigation activities. Upon defining the extent of impacts to soil and groundwater, and identifying pathways to receptors at risk of exposure, SET will prepare a *Site Investigation Report & Remedial Action Plan (SI/RAP)* for WDNR review and approval.



2.0 BACKGROUND

2.1 Site Location and Contacts

The subject property consists of one parcel of land located at 2529 E Norwich Avenue, in the City of St Francis, Milwaukee County, Wisconsin. Figure 1 illustrates the site location. The property occupies 5.82 acres and is assigned parcel numbers 5849973001, 5849975000, and 5849976000. The site is located at the northwest quarter of the northeast quarter of Section 22, Township 6 North, Range 22 East. Wisconsin Transverse Mercator coordinates for the site are X 692936, Y 279779 (WTM91).

The following contact information is provided:

Responsible Party (RP): Mr. Mike Higgins
Complete Recycling Services, LLC.
2529 E Norwich Avenue
St Francis, Wisconsin 53140

Environmental Consultant: Kurt McClung, PG, PE
SET Engineering, LLC
735 North Water Street, Suite 510
Milwaukee, Wisconsin 53202
414 224-8300

2.2 Site Description

The site consists of an irregular-shaped parcel of land located that occupies 5.82 acres and is developed with an approximately 70,000 square foot, slab-on-grade, single story building and a gravel parking lot. The property has potable water, sanitary, and stormwater services provided by the City of St Francis. The building uses natural gas for heat.

The site is in an area of residential and industrial land-use activity. Surrounding land use is described as follows:

- North— Container Life Cycle Management, Steel Drum Supplier
- Northwest—Makers Village (Former DF site), Community Workshop
- West— Pennsylvania Avenue; St. Francis Auto Wreckers, Vehicle Scrapyard & Used Auto Parts
- South— Wisconsin Electric Power Company, Electric Transmission Lines
- East— Wisconsin Electric Power Company, Norwich Electrical Substation

A site plan map is presented as Figure 2. A parcel report and City of St Francis zoning map are included in Attachment 2.

2.3 Site History

According to historical records, the first documented development at the subject property was a Sanborn Map depicting a small dwelling and garage located at the northeast portion of the subject property. An aerial photo dated 1950 presents two small buildings at the northeast portion of the site. The south portion of the site appeared to be cleared of trees.

The 1955 aerial photo depicts a small building and equipment at the southwest corner of the property. Aerial photos between 1963 and 1981 depict the building at the northeast portion of the property appears to undergo a series of expansions and the south portion of the property appeared to be used for vehicle and equipment storage.

Aerial photos from 1986 to 2020 illustrate the building at the northeast portion of the site appears to have been expanded to its current footprint by 2005. The south portion of the property west of the main building appears to be used for storing semi-trailers.

In September 2012, soil samples were collected from borings advanced at the site as part of an investigation of a hydrocarbon release at the adjacent property located north of the site. Based on hydrocarbon detections in shallow soil samples collected at the northwest corner of the site, an RP letter was issued by WDNR to Mid-America Steel Drum Company on February 14, 2013. The suspected release was believed to consist of petroleum and non-petroleum hydrocarbons.

In June 2013, additional direct-push borings and groundwater monitoring wells were installed at the site. Soil samples were collected from the borings and monitoring wells, and groundwater samples were collected from the wells. The results of the soil and groundwater sampling indicated soil and groundwater impacted by volatile organic compounds (VOCs) are present at the northwest corner of the site.

A *SIWP* and an *Amended SIWP* were submitted to WDNR in 2017. In November 2017, additional borings and nested wells were installed at the site to define the extent of soil impacts and to evaluate the horizontal and vertical extents of groundwater impacts. Subsequent groundwater sampling events occurred in April and November 2022 that indicated groundwater VOC impacts exceeding the NR 140 enforcement standards.

Table 1 is a summary of soil sampling analytical results and detected VOCs are illustrated on Figure 3. Table 2 is a summary of depth to groundwater measurements and the groundwater elevation contour maps for a perched saturated interval and for a deeper confined aquifer are presented on Figures 4 and 5, respectively. Table 3 is a summary of groundwater sampling analytical results and the detections are depicted on Figure 6.

The subject property has been occupied by Complete Recycling Services, LLC. since 2014. The on-site building at the east side of the property is used for the recycling of ferrous and non-ferrous metal. Scrap metal is brought into the facility where it is sorted, separated, and



consolidated prior to shipping offsite. The west side of the property is used for tractor trailer storage.

2.4 Emerging Contaminants

The objective of this work plan is to define the extent of hydrocarbons released at the subject property in soil and groundwater to the extent practicable. The hydrocarbons appear to have been released at the northwest corner of the property through improper handling and/or storage of VOCs used for automobile maintenance and/or engine repair. Wisconsin Administrative Code (Wis. Admin. Code) Chapter NR 716.09 and NR 716.15 require RPs to develop and submit to the WDNR a work plan and a report which evaluates the "history of the site or facility, including industrial, commercial, or other land uses that may have been associated with one or more hazardous substance discharges at the site or facility."

In April 2022, groundwater samples were collected for analysis of 1,4-dioxane and per/polyfluoroalkyl substances (PFAS) in off-site wells MW-2 and PMW-2, and on-site wells SMW-4 and SPM-4. No detectable concentrations of 1,4-dioxane were reported. PFAS were detected in all four of the groundwater samples at concentrations exceeding the NR 140 ES for perfluorooctanoic acid (PFOA) and perfluorooctane sulfonate (PFOS). These results were reported on WDNR Form 4400-231 on June 3, 2022.



3.0 GEOLOGY AND HYDROGEOLOGY

3.1 Site Topography, Geology, and Hydrogeology

The elevation of the subject property is approximately 671 feet above mean seal level (USGS 2018) and is located in the Kinnickinnic River Watershed (WDNR Gateway to Basins). Shallow, perched groundwater in the vicinity of the subject property appears to be influenced by preferred infiltration areas (gravel parking), a utility corridor in the South Pennsylvania right-of-way, and raised (filled) areas to the north and south of the subject property. Depth to shallow groundwater at the investigation area is variable, ranging from approximately 1 to 8 feet below ground surface (bgs). Deeper groundwater in a confined layer of granular soil is approximately 11 to 19 feet bgs.

Unconsolidated deposits in the vicinity of the site are estimated to be 140 feet thick over Silurian Dolomite. Local deposits consist of glacial ice contact, lacustrine, and outwash sediments. Shallow on-site soil consists of interbedded silt and fine sand, and a course sandy gravel at approximately 22 to 34 feet bgs. Bedrock has not been encountered and bedrock is not planned to be investigated.

4.0 PROPOSED SCOPE OF SERVICES

This *SWP* presents the methods for conducting the investigation activities planned at the subject property. This section is intended to present a detailed description of the services to be completed during this investigation. The contents of this section were prepared in accordance with Wis. Admin. Code Chapter NR 716.09 and based on recommendations provided by WDNR by e-mail on November 30, 2023. Table 4 is a rationale table that refers to the WDNR e-mail and describes the planned scope for the borings and soil samples proposed below.

4.1 Soil Boring and Well Installation

SET proposes to advance up to ten borings using direct push sampling methods. The depth of the borings will penetrate up to 12 feet bgs intended to define the horizontal and vertical extent of soil impacts. Soil samples will be collected continuously for field screening and classification based on texture and grain size. Soil samples for laboratory analysis are anticipated from the following depth intervals:

- The direct contact interval (0 to 4 feet),
- The field-discernable water table (expected at approximately 10 feet bgs), and
- The end of boring (if an impacted confined water-bearing unit is encountered).

Two or three soil samples from each boring will be analyzed for VOCs using Method 8260B. The proposed locations are presented on Figure 7.

A field geologist will oversee the soil sampling activities and log the field observations, texture, and engineering properties of the soil. The soil will be field screened for vapors using a photoionization detector (PID). Soil descriptions and PID readings will be recorded on Soil Boring Logs (WDNR Form 4400-122).

One boring will be converted to a monitoring well using a hollow stem auger rig to replace SMW-3. This well will be constructed with a 10-foot screen installed to intersect the water table.

Two wells will be constructed to determine the vertical extent of groundwater hydrocarbon impact and will be nested with KMW-6 and MW-14. These piezometers will be constructed with 5-foot screens installed to depths of approximately 35 feet bgs to intersect a confined water-bearing unit. Monitoring Well Construction Forms (WDNR Form 4400-113A) will be prepared for each new well.

The wells will be developed in accordance with Wis. Admin. Code Chapter NR 141. The wells will be developed using a bailer or pump. For wells that cannot be purged dry, approximately 10 water volumes will be removed from the well or until the well produces sediment-free water. For wells that can be purged dry, development will consist of slowly purging the well dry and allowing recovery. Well development forms (WDNR Form 4400 113B) will be prepared for each new well.

4.2 Groundwater Sampling

Prior to groundwater sampling, a round of site-wide depth to groundwater measurements will be collected using a decontaminated electronic water level meter. The locations of existing and proposed wells are presented on Figure 7. Static groundwater level measurements will be measured and recorded to 0.01-foot. Groundwater samples will be submitted for laboratory analysis of VOCs using Method 8260B.

Dedicated polyethylene tubing and a peristaltic pump will be used to collect groundwater samples from the wells to limit the potential for cross contamination. Nitrile gloves will be worn by the sampling personnel and discarded between each sampling location and following any activity that may produce cross-contamination. All containers and preservatives will be obtained directly from the analytical laboratory. Immediately after collection, the sample containers will be placed in a cooler with ice until shipment to the appropriate laboratory can be arranged. Standard chain-of-custody procedures will be followed throughout sample collection, storage, and shipment.

4.3 Indoor Air Quality

ADJACENT PROPERTY BUILDING

An evaluation of risk for vapor intrusion at buildings will be completed that follows RR-800 and other applicable WDNR guidance. A potential vapor intrusion pathway may be open at a release site where VOCs are present and/or migrating through subsurface soil, groundwater, or other media. Since subsurface VOCs may have migrated or have the potential to migrate to current or future occupied buildings, an evaluation of the vapor intrusion pathway is proposed.

If the vapor intrusion pathway is open for VOCs that originate solely from a release that occurred at the subject property, vapor sampling may be warranted to evaluate whether a building's occupants are at risk for vapor intrusion.

4.4 Preferential Pathways

Underground utilities will be evaluated to determine if dissolved- and/or vapor-phase hydrocarbons are migrating on- or off-site through preferential pathways. Utility conduits such as potable water, sanitary sewer, natural gas, storm water, and other buried utilities can allow contaminated media to migrate on- and/or off-site, either through a leaking conduit or through the pipe bedding. Utilities in the South Pennsylvania Avenue will be evaluated as potential preferred flow paths for contaminant migration.

Design drawings for utilities in the right-of-way will be obtained from the City of St Francis. If the utility bed intersects the water table, the corridor may act as a preferred flow path for migration of contaminated groundwater (toward the subject property and/or away from the site). Additionally, material in utility conduits may be impacted by vapors and/or impacted



groundwater. The scope of this *S/WP* will include an evaluation of migration through a utility corridor.

4.5 Quality Assurance and Quality Control

All laboratory samples will be analyzed by a Wisconsin-certified laboratory. Standard chain of custody protocols from sample collection to laboratory analysis will be followed. Soil and groundwater samples will be packed in a cooler, cooled to 4° C on ice, and transported to the laboratory. Each sample will be identified and labeled with a field sample identification number consisting of a SET project number, sample matrix identifier, sample location identifier, sample number identifier, samplers name, and the time and date collected.

Groundwater samples will include one trip blank to be analyzed for VOCs. The trip blank will be supplied by the laboratory and maintained with the collected samples. The trip blank is a water sample prepared by the laboratory and analyzed to identify contamination which may occur due to outside influences.

4.6 Investigative-Derived Waste

Soil cuttings and purge water generated during the soil boring advancement and well installation will be containerized in appropriate steel 55-gallon drums. Water generated during drilling, sampling activities, and decontamination water generated during the cleaning of down-hole equipment will be containerized in 55-gallon drums. Arrangements will be made with a licensed disposal facility for the transportation and disposal of the waste.

4.7 Reporting and Schedule

Following receipt of the soil, groundwater, and vapor analytical results, SET will evaluate the data and determine if additional investigation is necessary. Upon completing the investigation, SET intends to prepare a report to present the procedures followed during the investigation and the results of the field screening and analytical testing. Copies of all boring logs, well construction, well development, borehole abandonment forms, and analytical reports will be included.

The above discussed scope of services will be completed following WDNR approval of this *S/WP*.



5.0 QUALIFICATIONS

This *SIWP* and the proposed study were prepared using the degree of care and skill ordinarily exercised under similar circumstances, by environmental consultants practicing in this or similar localities. No other warranty or guarantee, expressed or implied, is made as to the conclusions and recommendations included in this report.

Specified information contained in this report has been obtained from publicly available sources and other secondary sources of information produced by entities other than SET Engineering, LLC. Although care has been taken by SET Engineering, LLC, in compiling this information, SET Engineering, LLC, disclaims any and all liability for any errors, omissions, or inaccuracies of the third parties information and data.

This report was prepared for Complete Recycling Services, LLC. The report is the property of Complete Recycling Services, LLC. and SET Engineering, LLC, and cannot be used without written consent from both parties.



6.0 REFERENCES

American Society of Testing and Materials, *Standard Method for Penetration Test and Split Barrel Sampling of Soil*, Designation D1586.

Mickelson, David M., et al., Miscellaneous Paper 84-1: *Pleistocene Stratigraphic Units of Wisconsin*, Wisconsin Geological and Natural History Survey, July 1984.

Trotta, L.C., *Depth to Bedrock in Wisconsin Map*, 1973.

United States Geological Survey, *Greendale 7.5-Minute Quadrangle Map*, 2018.

Wisconsin Administrative Code. Chapter NR 140 Groundwater Quality Standards.

Wisconsin Administrative Code. Chapter NR 141 Monitoring Well Installation Procedures.

Wisconsin Administrative Code. Chapters NR 700 Investigation and Remediation of Environmental Contamination.

Wisconsin Department of Natural Resources Web Page, *Gateway to Basins, Kinnickinnic River Watershed*.

Tables

TABLE 2

Groundwater Elevation Summary

Mid-America Steel Drum Company Inc/Kitzinger Site
2529 East Norwich Avenue, St. Francis, Wisconsin
BRRTS 02-41-560089

MW-1 Off-Site Shallow Stick-up			
Ground Elevation			657.10
Top of Casing Elevation			659.28
Top of Screen Elevation			654.90
Bottom of Screen Elevation			644.90
Date	Depth To Water	Groundwater Elevation	Comments
12/7/2017	NM		
3/21/2018	6.10	653.18	
6/28/2018	NM		
6/21/2019	4.61	654.67	
1/27/2020	4.10	655.18	LF Green sampled DF Property
4/14/2022	3.69	655.59	
11/3/2022	5.96	653.32	
11/16/2023	5.50	653.78	

MW-2 Off-Site Shallow Flushmount			
Ground Elevation			666.04
Top of Casing Elevation (2022)			665.77
Top of Screen Elevation			662.12
Bottom of Screen Elevation			652.12
Date	Depth To Water	Groundwater Elevation	Comments
12/8/2017	NM		
3/21/2018	6.60	658.95	
6/28/2018	NM		
6/21/2019	5.72	659.83	
1/27/2020	11.90	653.65	LF Green sampled DF Property
4/14/2022	5.49	660.28	Resurveyed 4/21/2022
11/3/2022	7.04	658.73	
11/16/2023	6.07	659.70	

PMW-2 Off-Site Deep Stick-up					
Ground Elevation				665.73	
Top of Casing Elevation (2022)				665.47	
Top of Screen Elevation				649.15	
Bottom of Screen Elevation				639.15	
Date	Depth To Water	Depth to Product	Product Thickness	Un-Corrected Groundwater Elevation	Comments
12/8/2017	14.30	13.87	0.43	654.35	
3/21/2018	14.25	-	-	654.40	
6/28/2018	NM	-	-	-	
6/21/2019	11.49	-	-	657.16	
1/27/2020	8.90	-	-	659.75	LF Green sampled DF Property
4/14/2022	9.16	-	-	656.31	Resurveyed 4/21/2022
11/3/2022	9.20	-	-	656.27	
11/16/2023	9.75	-	-	655.72	

MW-3 Off-Site Shallow Flushmount			
Ground Elevation			659.24
Top of Casing Elevation			658.66
Top of Screen Elevation			655.32
Bottom of Screen Elevation			645.32
Date	Depth To Water	Groundwater Elevation	Comments
12/8/2017	5.38	653.28	
3/21/2018	5.60	653.06	
6/28/2018	NM	-	
6/21/2019	3.95	654.71	
1/27/2020	3.95	654.71	LF Green sampled DF Property
4/14/2022	4.55	654.11	
11/3/2022	NM		
11/16/2023	NM		

MW-4 Off-Site Shallow Stick-up			
Ground Elevation			658.57
Top of Casing Elevation (2022)			660.74
Top of Screen Elevation			654.57
Bottom of Screen Elevation			644.57
Date	Depth To Water	Groundwater Elevation	Comments
12/8/2017	NM	-	
3/21/2018	7.71	653.03	
6/28/2018	NM	-	
6/21/2019	6.81	653.93	
1/27/2020	4.40	656.34	LF Green sampled DF Property
4/14/2022	6.79	653.95	Resurveyed 4/21/2022
11/3/2022	8.10	652.64	
11/16/2023	NM		

TABLE 2
Groundwater Elevation Summary
 Mid-America Steel Drum Company Inc/Kitzinger Site
 2529 East Norwich Avenue, St. Francis, Wisconsin
 BRRTS 02-41-560089

MW-5 Shallow Flushmount			
Ground Elevation			662.64
Top of Casing Elevation			662.03
Top of Screen Elevation			658.66
Bottom of Screen Elevation			648.66
Date	Depth To Water	Groundwater Elevation	Comments
12/8/2017	9.20	652.83	
3/21/2018	9.30	652.73	
6/28/2018	NM	-	
6/21/2019	7.67	654.36	
1/27/2020	NM	-	LF Green sampled DF Property
4/14/2022	7.78	654.25	
11/3/2022	9.44	652.59	
11/16/2023	8.79	653.24	

MW-6 Shallow Flushmount			
Ground Elevation			663.81
Top of Casing Elevation			663.58
Top of Screen Elevation			658.85
Bottom of Screen Elevation			648.85
Date	Depth To Water	Groundwater Elevation	Comments
12/8/2017	NM	-	Could not locate
3/21/2018	10.20	653.38	
6/28/2018	NM	-	
6/21/2019	8.00	655.58	
1/27/2020	NM	-	LF Green sampled DF Property
4/14/2022	8.37	655.21	Resurveyed 4/21/2022
11/3/2022	10.24	653.34	
11/16/2023	9.45	654.13	

MW-7 Shallow Flushmount			
Ground Elevation			659.10
Top of Casing Elevation (2022)			658.67
Top of Screen Elevation			655.91
Bottom of Screen Elevation			645.91
Date	Depth To Water	Groundwater Elevation	Comments
12/8/2017	8.16	651.04	
3/21/2018	NM	-	
6/28/2018	NM	-	
6/21/2019	NM	-	6 feet NAPL
1/27/2020	NM	-	LF Green sampled DF Property
4/14/2022	4.24	654.43	TOC cut down, resurveyed 4/21/2022
11/3/2022	4.37	654.30	
11/16/2023	NM		

PMW-7 Off-Site Deep Flushmount			
Ground Elevation			659.03
Top of Casing Elevation			658.71
Top of Screen Elevation			643.41
Bottom of Screen Elevation			633.41
Date	Depth To Water	Groundwater Elevation	Comments
12/8/2017	NM	-	
3/21/2018	NM	-	
6/28/2018	NM	-	
6/21/2019	6.21	652.50	
1/27/2020	6.00	652.71	LF Green sampled DF Property
4/14/2022	7.38	651.33	
11/3/2022	NM		
11/16/2023	NM		

MW-8 Shallow Stick-up			
Ground Elevation			659.89
Top of Casing Elevation			663.73
Top of Screen Elevation			656.96
Bottom of Screen Elevation			651.96
Date	Depth To Water	Groundwater Elevation	Comments
12/8/2017	12.55	651.18	
3/21/2018	6.88	656.85	
6/28/2018	NM	-	
6/21/2019	5.99	657.74	
1/27/2020	2.00	661.73	LF Green sampled DF Property
4/14/2022			ABANDONED

PMW-8 Off-Site Deep Stick-up			
Ground Elevation			659.54
Top of Casing Elevation (2022)			659.10
Top of Screen Elevation			635.75
Bottom of Screen Elevation			630.75
Date	Depth To Water	Groundwater Elevation	Comments
12/8/2017	NM	-	
3/21/2018	12.50	649.90	
6/28/2018	NM	-	
6/21/2019	9.96	652.44	
1/27/2020	7.10	655.30	LF Green sampled DF Property
4/14/2022	9.40	649.70	Resurveyed 4/21/2022
11/3/2022	8.84	650.26	
11/16/2023	NM		

MW-9 Shallow Flushmount			
Ground Elevation			656.94
Top of Casing Elevation			659.28
Top of Screen Elevation			653.29
Bottom of Screen Elevation			643.29
Date	Depth To Water	Groundwater Elevation	Comments
12/8/2017	NM	-	
3/21/2018	NM	-	
6/28/2018	NM	-	
6/21/2019	11.77	647.51	
1/27/2020	11.90	647.38	LF Green sampled DF Property
4/14/2022	NM	-	
11/3/2022	12.30	646.98	
11/16/2023	NM		

MW-14 Shallow Flushmount			
Ground Elevation			667.19
Top of Casing Elevation			666.73
Top of Screen Elevation			661.22
Bottom of Screen Elevation			651.22
Date	Depth To Water	Groundwater Elevation	Comments
12/8/2017	14.00	652.73	
3/21/2018	NM	-	
6/28/2018	NM	-	
6/21/2019	9.42	657.31	
1/27/2020	NM	-	LF Green sampled DF Property
4/14/2022	11.44	655.29	
11/3/2022	13.33	653.40	
11/16/2023	NM		

TABLE 2
Groundwater Elevation Summary
 Mid-America Steel Drum Company Inc/Kitzinger Site
 2529 East Norwich Avenue, St. Francis, Wisconsin
 BRRTS 02-41-560089

MW-15					Shallow Flushmount
Ground Elevation				665.57	
Top of Casing Elevation				664.96	
Top of Screen Elevation				660.11	
Bottom of Screen Elevation				650.11	
Date	Depth To Water	Depth to Product	Product Thickness	Un-Corrected Groundwater Elevation	Comments
12/8/2017	10.80	-	-	654.16	could not measure NAPL thickness
3/21/2018	NM	-	-	-	
6/28/2018	NM	-	-	-	
6/21/2019	8.71	-	-	656.25	
1/27/2020	NM	-	-	-	LF Green sampled DF Property
4/14/2022	9.29	-	-	655.67	
11/3/2022	10.77	-	-	654.19	
11/16/2023	NM	-	-	-	

MW-16				Shallow Flushmount
Ground Elevation			658.42	
Top of Casing Elevation			658.11	
Top of Screen Elevation			655.31	
Bottom of Screen Elevation			645.31	
Date	Depth To Water	Groundwater Elevation	Comments	
12/8/2017	NM	-		
3/21/2018	NM	-		
6/28/2018	NM	-		
6/21/2019	2.45	655.66		
1/27/2020	3.20	654.91	LF Green sampled DF Property	
4/14/2022	NM	-		
11/3/2022	NM	-		
11/16/2023	NM	-		

MW-17				Shallow Flushmount
Ground Elevation			659.11	
Top of Casing Elevation			658.70	
Top of Screen Elevation			640.10	
Bottom of Screen Elevation			630.10	
Date	Depth To Water	Groundwater Elevation	Comments	
12/8/2017	NM			
3/21/2018	NM			
6/28/2018	NM			
6/21/2019	5.91	652.79		
1/27/2020	6.20	652.50	LF Green sampled DF Property	
4/14/2022	NM	-		
11/3/2022	NM	-		
11/16/2023	NM	-		

SMW-3				Shallow Flushmount
Ground Elevation			668.81	
Top of Casing Elevation			668.17	
Top of Screen Elevation			660.32	
Bottom of Screen Elevation			650.32	
Date	Depth To Water	Groundwater Elevation	Comments	
12/8/2017	NM		could not locate well	
3/21/2018	4.84	663.33		
6/28/2018	4.85	663.32		
6/21/2019	4.52	663.65		
1/27/2020	NM	-	LF Green sampled DF Property	
4/14/2022	NM		Well Damaged	
11/3/2022			ABANDONED	

TABLE 2
Groundwater Elevation Summary
 Mid-America Steel Drum Company Inc/Kitzinger Site
 2529 East Norwich Avenue, St. Francis, Wisconsin
 BRRTS 02-41-560089

SMW-4 Shallow Flushmount			
Ground Elevation			667.88
Top of Casing Elevation			667.23
Top of Screen Elevation			659.43
Bottom of Screen Elevation			649.43
Date	Depth To Water	Groundwater Elevation	Comments
11/22/2017	8.23	659.00	
12/8/2017	6.30	660.93	
3/21/2018	7.63	659.60	
6/28/2018	6.42	660.81	
6/21/2019	6.18	661.05	
1/27/2020	NM	-	LF Green sampled DF Property
4/14/2022	6.65	660.58	
11/3/2022	6.51	660.72	
11/16/2023	6.45	660.78	

SPM-4 Deep Flushmount			
Ground Elevation			667.86
Top of Casing Elevation			667.53
Top of Screen Elevation			643.23
Bottom of Screen Elevation			633.23
Date	Depth To Water	Groundwater Elevation	Comments
11/22/2017	3.85	663.68	
12/8/2017	14.05	653.48	
3/21/2018	14.91	652.62	
6/28/2018	11.98	655.55	
6/21/2019	11.45	656.08	
1/27/2020	NM	-	LF Green sampled DF Property
4/14/2022	14.08	653.45	
11/3/2022	13.77	653.76	
11/16/2023	NM		Not located

KMW-1 Shallow Flushmount			
Ground Elevation			670.32
Top of Casing Elevation			669.97
Top of Screen Elevation			-
Bottom of Screen Elevation			-
Date	Depth To Water	Groundwater Elevation	Comments
11/22/2017	NM	-	not found
12/8/2017	NM	-	not found
3/20/2018	NM	-	not found
6/27/2018	NM	-	not found
6/21/2019	NM	-	not found
1/27/2020	NM	-	not found
4/14/2022	NM	-	not found
11/3/2022	7.19	662.78	
11/16/2023	4.82	665.15	

KMW-2 Shallow Flushmount			
Ground Elevation			678.01
Top of Casing Elevation			677.65
Top of Screen Elevation			
Bottom of Screen Elevation			662.55
Date	Depth To Water	Groundwater Elevation	Comments
11/22/2017	2.72	674.93	
12/8/2017	2.58	675.07	
3/20/2018	3.55	674.10	
6/27/2018	0.90	676.75	
6/21/2019	1.30	676.35	
1/27/2020	NM	-	LF Green sampled DF Property
4/14/2022	NM	-	inaccessible
11/3/2022	1.57	676.08	
11/16/2023	1.47	676.18	

KMW-3 Shallow Flushmount			
Ground Elevation			678.25
Top of Casing Elevation			677.83
Top of Screen Elevation			
Bottom of Screen Elevation			662.73
Date	Depth To Water	Groundwater Elevation	Comments
11/22/2017	4.49	673.34	
12/8/2017	4.63	673.20	
3/20/2018	8.43	669.40	
6/27/2018	2.93	674.90	
6/21/2019	2.05	675.78	flushmount needs repair
1/27/2020	NM	-	LF Green sampled DF Property
4/14/2022	8.23	669.60	
11/3/2022	3.40	674.43	
11/16/2023	3.80	674.03	

KMW-4 Shallow Flushmount			
Ground Elevation			670.76
Top of Casing Elevation			670.15
Top of Screen Elevation			667.15
Bottom of Screen Elevation			652.15
Date	Depth To Water	Groundwater Elevation	Comments
			not installed
12/8/2017	17.55	652.60	
3/20/2018	13.28	656.87	
6/28/2018	8.70	661.45	
6/21/2019	9.62	660.53	
1/27/2020	NM	-	LF Green sampled DF Property
4/14/2022	9.96	660.19	
11/3/2022	16.50	653.65	
11/16/2023	17.70	652.45	

TABLE 2

Groundwater Elevation Summary

Mid-America Steel Drum Company Inc/Kitzinger Site
2529 East Norwich Avenue, St. Francis, Wisconsin
BRRTS 02-41-560089

KMW-5			Shallow Stick-up
Ground Elevation			671.94
Top of Casing Elevation			671.61
Top of Screen Elevation			666.36
Bottom of Screen Elevation			651.36
Date	Depth To Water	Groundwater Elevation	Comments
12/8/2017	dry		
3/20/2018	17.20	654.41	
6/27/2018	10.98	660.63	
6/21/2019	11.09	660.52	
1/27/2020	NM	-	LF Green sampled DF Property
4/14/2022	9.41	662.20	
11/3/2022	12.04	659.57	
11/16/2023	11.89	659.72	

KMW-6			Shallow Flushmount
Ground Elevation			672.06
Top of Casing Elevation			671.61
Top of Screen Elevation			668.91
Bottom of Screen Elevation			653.91
Date	Depth To Water	Groundwater Elevation	Comments
12/8/2017	dry		
3/20/2018	5.83	665.78	
6/27/2018	3.30	668.31	
6/21/2019	NM	-	
1/27/2020	NM	-	LF Green sampled DF Property
4/14/2022	15.94	655.67	
11/3/2022	12.47	659.14	
11/16/2023	12.23	659.38	

KPZ-1			Deep Flushmount
Ground Elevation			670.80
Top of Casing Elevation			670.26
Top of Screen Elevation			647.96
Bottom of Screen Elevation			637.96
Date	Depth To Water	Groundwater Elevation	Comments
12/8/2017	19.15	651.11	
3/20/2018	19.30	650.96	KPZ-2 TD in field notes
6/28/2018	18.18	652.08	
6/21/2019	17.21	653.05	
1/27/2020	NM	-	LF Green sampled DF Property
4/14/2022	18.73	651.53	
11/3/2022	18.67	651.59	
11/16/2023	18.84	651.42	

KPZ-2			Deep Stick-up
Ground Elevation			672.18
Top of Casing Elevation			671.92
Top of Screen Elevation			644.62
Bottom of Screen Elevation			634.62
Date	Depth To Water	Groundwater Elevation	Comments
12/8/2017	19.50	652.42	
3/21/2018	18.42	653.50	KPZ-1 TD in field notes
6/28/2018	16.33	655.59	
6/21/2019	15.98	655.94	
1/27/2020	NM	-	LF Green sampled DF Property
4/14/2022	16.77	655.15	
11/3/2022	16.99	654.93	
11/16/2023	16.75	655.17	

Notes:

Top of Casing and Ground Elevations were obtained from a December 2017 and April 2018 land survey, except where noted.

NM = Not Measured

dry = Well did not have measurable water in casing.

TD = total depth

TABLE 3
Groundwater Sampling Analytical Results
 Mid-America Steel Drum Company Inc/Kitzinger Site
 2529 East Norwich Avenue, St. Francis, Wisconsin
 BRRTS 02-41-560089

Date Collected	Benzene	n-Butyl benzene	sec-Butyl benzene	tert-Butyl benzene	Chloroethane	1,1-DCA	1,2-DCA	1,1-DCE	cis-1,2-DCE	trans-1,2-DCE	Ethylbenzene	Isopropyl benzene (Cumene)	p-Isopropyl toluene	Methylene Chloride	Naphthalene	n-Propyl benzene	PCE	Toluene	1,1,1-TCA	1,1,2-TCA	TCE	1,2,4-TMB	1,3,5-TMB	Vinyl chloride	Xylenes	
NR 140 ES	5.0	NS	NS	NS	400	850	5.0	7.0	70	100	700	NS	NS	5.0	100	NS	5.0	800	200	5.0	5.0	480		0.2	2,000	
NR 140 PAL	0.5	NS	NS	NS	80	85	0.5	0.7	7.0	20	140	NS	NS	0.5	10	NS	0.5	160	40	0.5	0.5	96		0.02	400	
KPZ-1	12/8/17	<0.50	<0.50	<2.2	<0.18	<0.37	<0.24	<0.17	<0.41	<0.26	<0.26	<0.50	<0.14	<0.50	<0.23	<2.5	<0.50	<0.50	<0.50	<0.20	<0.33	<0.50	<0.50	<0.18	<1.5	
	3/20/18	<0.50	<0.50	<2.2	<0.18	<0.37	<0.24	<0.17	<0.41	<0.26	<0.26	<0.50	<0.14	<0.50	<0.23	<2.5	<0.50	<0.50	<0.50	<0.20	<0.33	<0.50	<0.50	<0.18	<1.5	
	6/28/18	<0.50	<0.50	<2.2	<0.18	<0.37	<0.24	<0.17	<0.41	<0.26	<0.26	<0.50	<0.14	<0.50	<0.23	<2.5	<0.50	<0.50	<0.50	<0.20	<0.33	<0.50	<0.50	<0.18	<1.5	
	6/28/18 D	<0.50	<0.50	<2.2	<0.18	<0.37	<0.24	<0.17	<0.41	<0.26	<0.26	<0.50	<0.14	<0.50	<0.23	<2.5	<0.50	<0.50	<0.50	<0.20	<0.33	<0.50	<0.50	<0.18	<1.5	
	4/15/22	<0.30	<0.86	<0.42	<0.59	<1.4	<0.30	<0.29	<0.58	<0.47	<0.53	<0.33	<1.0	<1.0	<0.32	<1.1	<0.35	<0.41	<0.29	<0.30	<0.34	<0.32	<0.45	<0.36	<0.17	<1.05
11/4/22	<0.30	<0.86	<0.42	<0.59	<1.4	<0.30	<0.29	<0.58	<0.47	<0.53	<0.33	<1.0	<1.0	<0.32	<1.1	<0.35	<0.41	<0.29	<0.30	<0.34	<0.32	<0.45	<0.36	<0.17	<1.05	
KPZ-2	12/8/17	<0.50	<0.50	<2.2	<0.18	<0.37	<0.24	<0.17	<0.41	<0.26	<0.26	<0.50	<0.14	<0.50	<0.23	<2.5	<0.50	<0.50	<0.50	<0.20	<0.33	<0.50	<0.50	<0.18	<1.5	
	3/21/18	<0.50	<0.50	<2.2	<0.18	<0.37	<0.24	<0.17	<0.41	<0.26	<0.26	<0.50	<0.14	<0.50	<0.23	<2.5	<0.50	<0.50	<0.50	<0.20	<0.33	<0.50	<0.50	<0.18	<1.5	
	6/28/18	<0.50	<0.50	<2.2	<0.18	<0.37	<0.24	<0.17	<0.41	<0.26	<0.26	<0.50	<0.14	<0.50	<0.23	<2.5	<0.50	<0.50	<0.50	<0.20	<0.33	<0.50	<0.50	<0.18	<1.5	
	4/14/22	<0.30	<0.86	<0.42	<0.59	<1.4	<0.30	<0.29	<0.58	<0.47	<0.53	<0.33	<1.0	<1.0	<0.32	<1.1	<0.35	<0.41	<0.29	<0.30	<0.34	<0.32	<0.45	<0.36	<0.17	<1.05
	11/4/22	<0.30	<0.86	<0.42	<0.59	<1.4	<0.30	<0.29	<0.58	<0.47	<0.53	<0.33	<1.0	<1.0	<0.32	<1.1	<0.35	<0.41	<0.29	<0.30	<0.34	<0.32	<0.45	<0.36	<0.17	<1.05

Notes

All results are expressed in micrograms per liter (mg/L), equivalent to parts per billion (ppb).

Results presented in underlined italic type exceed the NR 140 PAL

Results presented in **bold type** exceed the NR 140 ES

J - Results between the limit of detection and limit of quantitation

NS - No Standard

DCA - Dichloroethane

DCE - Dichloroethene

PCE - Tetrachloroethene

TCA - Trichloroethane

TCE - Trichloroethene

TMB - Trimethylbenzenes

VOCs - volatile organic compounds

NR 140 PAL - Wisconsin Administrative Code Chapter NR 140 Preventive Action Limit (February 2017)

NR 140 ES - Wisconsin Administrative Code Chapter NR 140 Enforcement Standard (February 2017)

TABLE 4
Rationale Table

Mid-America Steel Drum Company Inc/Kitzinger Site
2529 East Norwich Avenue, St. Francis, Wisconsin
BRRTS 02-41-560089

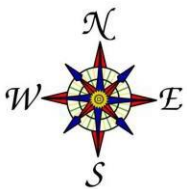
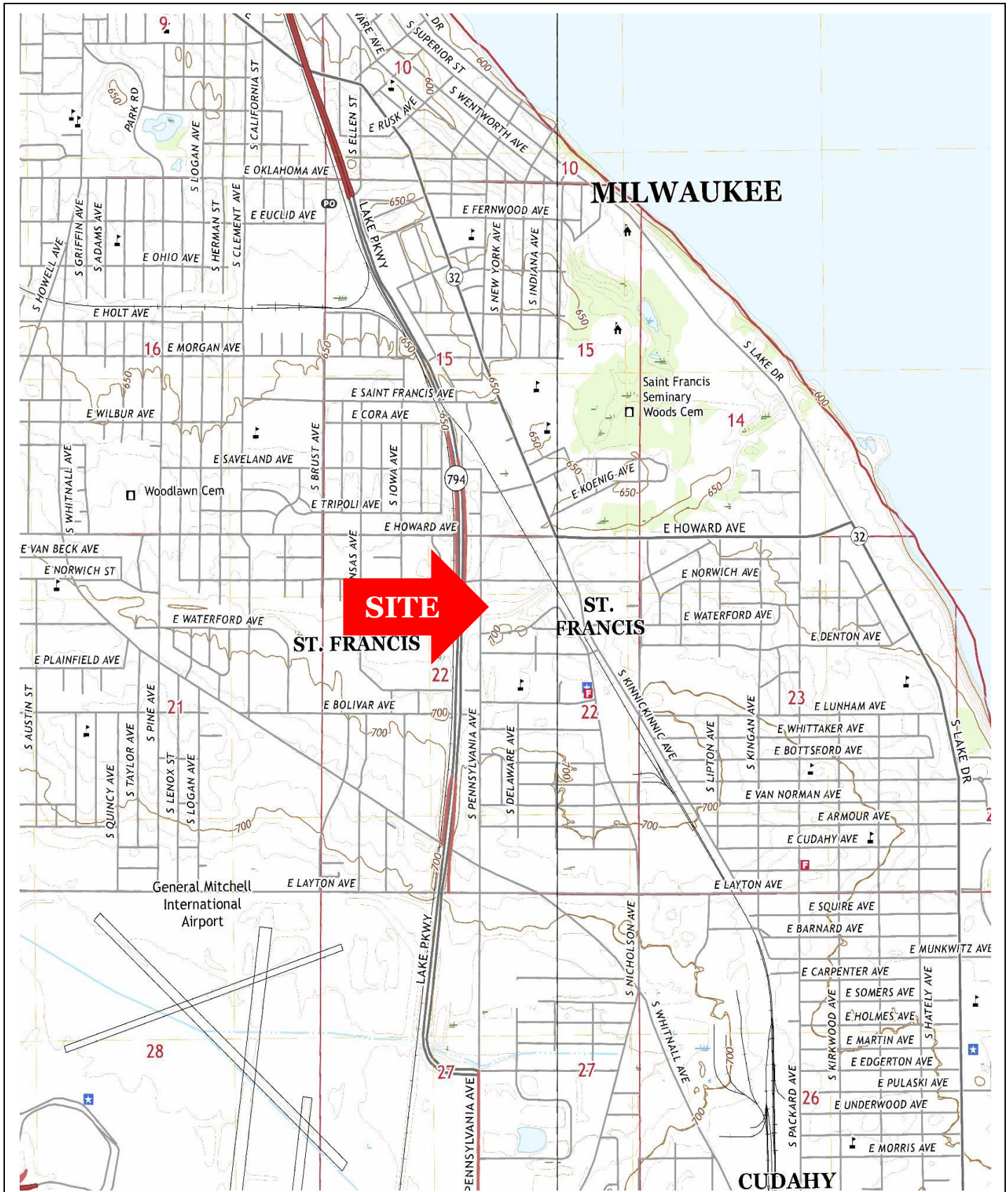
Item Number	Boring Location(s)	Installation Method	Quantity of Soil Samples	Sample Depth (feet bgs)	Rationale
1.0	borings at NW corner, north of the asphalt approach (~ 4)	DP	4 borings 2 samples ea 8 total	2 to 4; 10 to 12	define horizontal & vertical extent at suspected source area
2.0	eval soil & GW results at W boundary & utility corridor; borings at MW-15 & E of KMW-4, nested PZ at MW-14	DP/HSA	3 borings 3 samples ea 9 total	2 to 4; 10 to 12; EOB	determine if impacts are migrating on-site and/or through utility corridor, or if on-site source extends to gate
3.0	investigate shallow GW; install SMW-3R	HSA	1 boring 2 samples	2 to 4; 10 to 12	evaluate trends in GW at apparent source
4.0	investigate confined GW impacts; nest PZs at MW-14 & KMW-6	HSA	1 boring 3 samples not presented above	2 to 4; 10 to 12; EOB	determine if confined GW impacts are due to off-site source
5.0	define vertical extent of soil at SPM-4	DP	1 boring 2 samples	2 to 4; EOB	define vertical extent at suspected source area
5.1	define vertical extent of GW	HSA	0 samples	NA	a deeper piezometer is not proposed since GW impacts reported in piezometer SPM-4 are likely due to an off-site source
6.0	vapor risk assessment	NA	0 samples	NA	desk study; no samples proposed
7.0	PFAS assessment	NA	0 samples	NA	no additional wells or borings proposed to investigate PFAS

TOTAL: 24 soil samples for VOCs analysis

Notes

bgs = below ground surface
DP = direct push
EOB = end of boring
HSA = hollow stem auger
VOCs = volatile organic compounds

Figures



Project: E2203-0026-WO-0003
Map Source: USGS
Map Date: 2018
Quadrangle Map: Grendale

FIGURE 1
SITE LOCATION MAP
 2529 EAST NORWICH AVENUE
 ST FRANCIS, WISCONSIN



A Division of SET Environmental Inc.

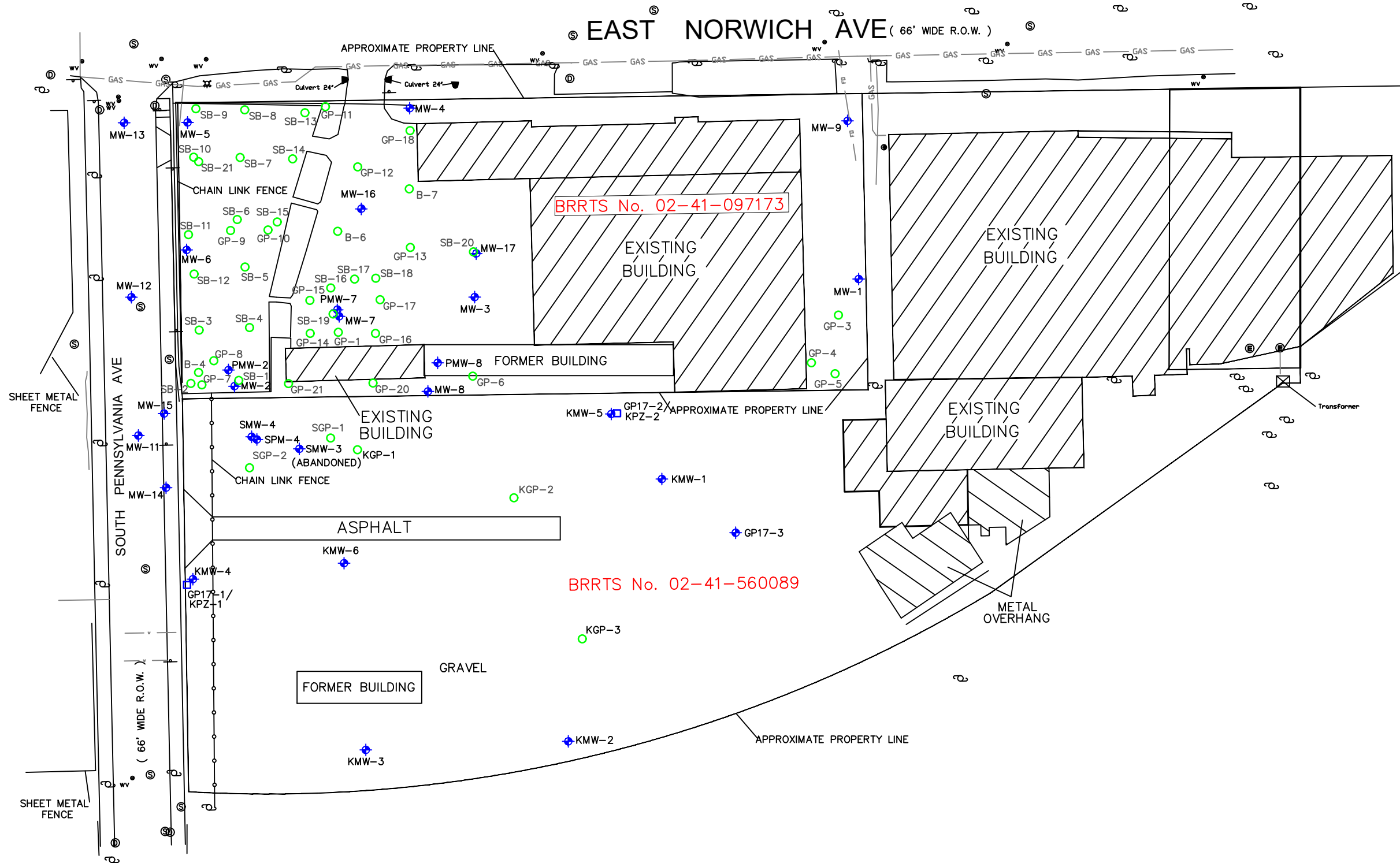
LEGEND

- - Denotes Soil Boring Location
- ◆ - Denotes Existing Monitoring Well
- - Denotes Existing Piezometer
- ⊙ - Denotes Existing Sewer Manhole
- ⊕ - Denotes Existing Power Pole
- ⊖ - Denotes Existing Water Valve
- ⊗ - Denotes Existing Hydrant
- ⊚ - Denotes Existing Electric Manhole
- ⊛ - Denotes Existing PVC Pipe/Culvert
- ⊜ - Denotes Existing Catch Basin
- - Denotes Existing Fiber Optic Line
- - Denotes Existing Electric Line
- - Denotes Existing Gas Line
- - Denotes Existing Water Line
- - Denotes Existing Gas Meter

BRRTS No. 02-41-000269

BRRTS No. 02-41-097173

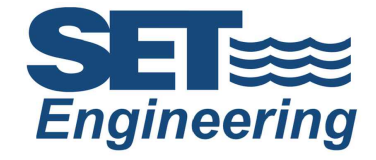
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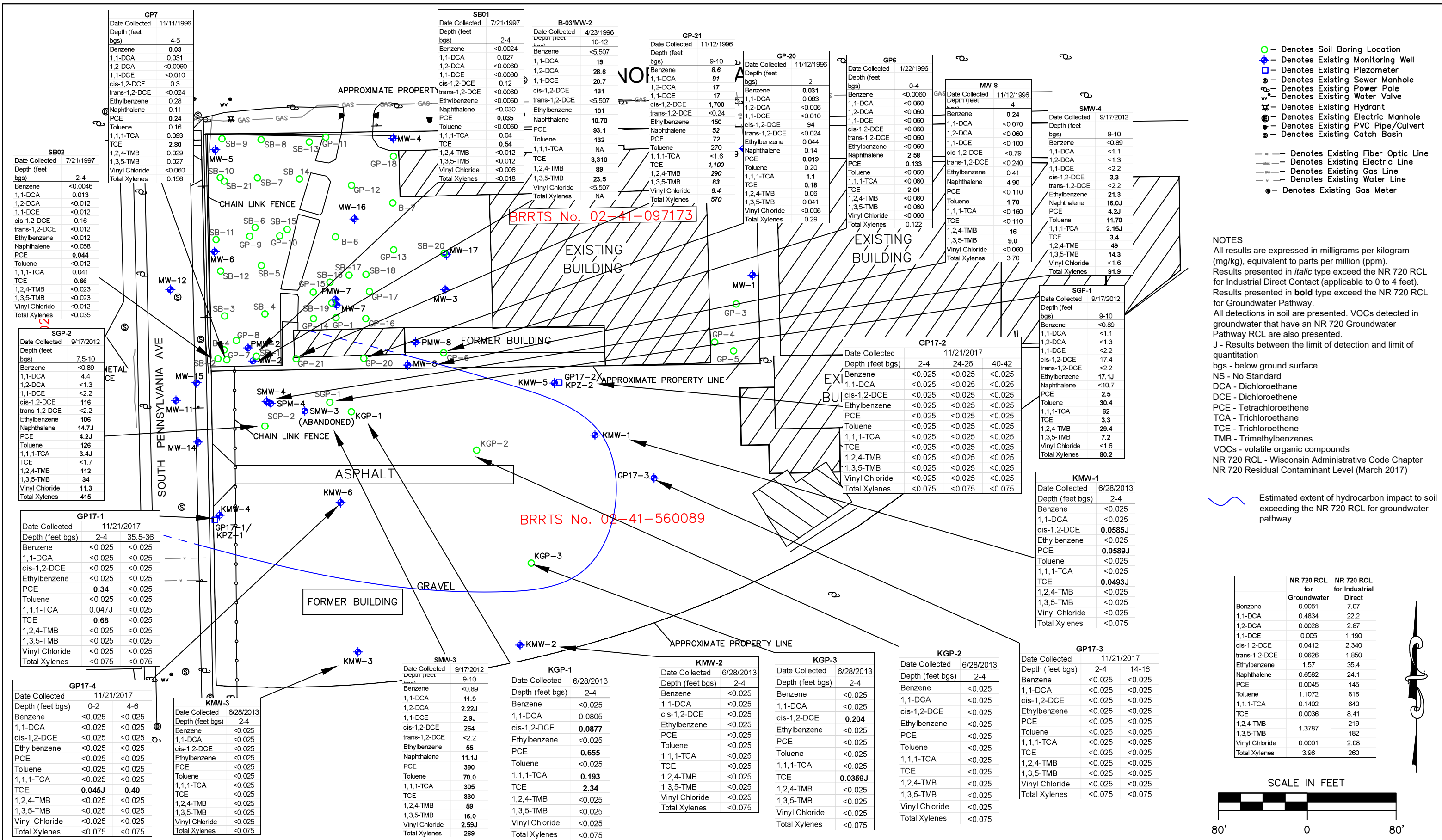


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APPROVED BY	SHEET NO.
CADFILE	XREF

11/27/2023
 e2203-0026-WO-0001
 1
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FIGURE 2
SITE PLAN
 2529 E. NORWICH AVENUE
 ST FRANCIS, WISCONSIN



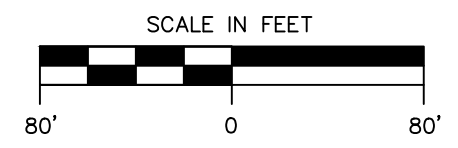


- - Denotes Soil Boring Location
- ◆ - Denotes Existing Monitoring Well
- - Denotes Existing Piezometer
- - Denotes Existing Sewer Manhole
- ⊕ - Denotes Existing Power Pole
- ⊖ - Denotes Existing Water Valve
- ⊗ - Denotes Existing Hydrant
- ⊙ - Denotes Existing Electric Manhole
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- - Denotes Existing Electric Line
- - Denotes Existing Gas Line
- - Denotes Existing Water Line
- ⊙ - Denotes Existing Gas Meter

NOTES
 All results are expressed in milligrams per kilogram (mg/kg), equivalent to parts per million (ppm). Results presented in *italic type* exceed the NR 720 RCL for Industrial Direct Contact (applicable to 0 to 4 feet). Results presented in **bold type** exceed the NR 720 RCL for Groundwater Pathway. All detections in soil are presented. VOCs detected in groundwater that have an NR 720 Groundwater Pathway RCL are also presented.
 J - Results between the limit of detection and limit of quantitation
 bgs - below ground surface
 NS - No Standard
 DCA - Dichloroethane
 DCE - Dichloroethene
 PCE - Tetrachloroethene
 TCA - Trichloroethane
 TCE - Trichloroethene
 TMB - Trimethylbenzenes
 VOCs - volatile organic compounds
 NR 720 RCL - Wisconsin Administrative Code Chapter NR 720 Residual Contaminant Level (March 2017)

Estimated extent of hydrocarbon impact to soil exceeding the NR 720 RCL for groundwater pathway

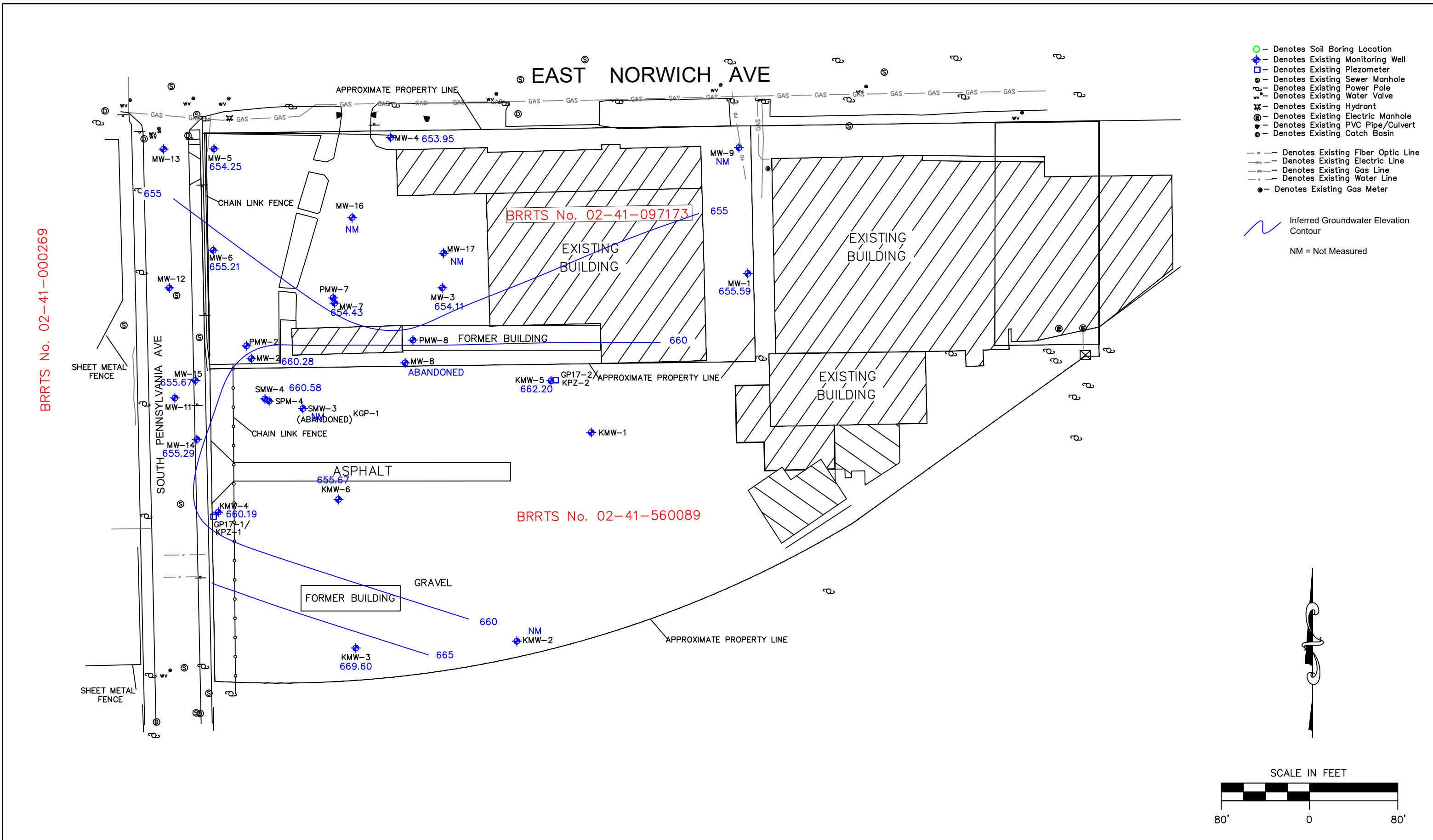
	NR 720 RCL for Groundwater	NR 720 RCL for Industrial Direct
Benzene	0.0051	7.07
1,1-DCA	0.4834	22.2
1,2-DCA	0.0028	2.87
1,1-DCE	0.005	1,190
cis-1,2-DCE	0.0412	2,340
trans-1,2-DCE	0.0626	1,850
Ethylbenzene	1.57	35.4
Naphthalene	0.6582	24.1
PCE	0.0045	145
Toluene	1.1072	818
1,1,1-TCA	0.1402	640
TCE	0.0036	8.41
1,2,4-TMB	1.3787	219
1,3,5-TMB	0.0001	182
Vinyl Chloride	0.0001	2.08
Total Xylenes	3.96	260



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EK	11/27/2023
DRAWN BY	PROJECT
EK	e2203-0026-WO-0001
APPROVED BY	SHEET NO.
KM	1
CADFILE	XREF
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FIGURE 3
SOIL SAMPLE ANALYTICAL RESULTS
 2529 E. NORWICH AVENUE
 ST FRANCIS, WISCONSIN



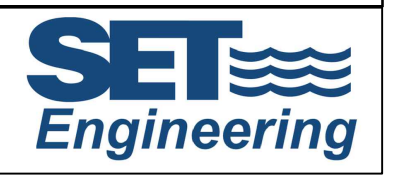


BRRTS No. 02-41-000269

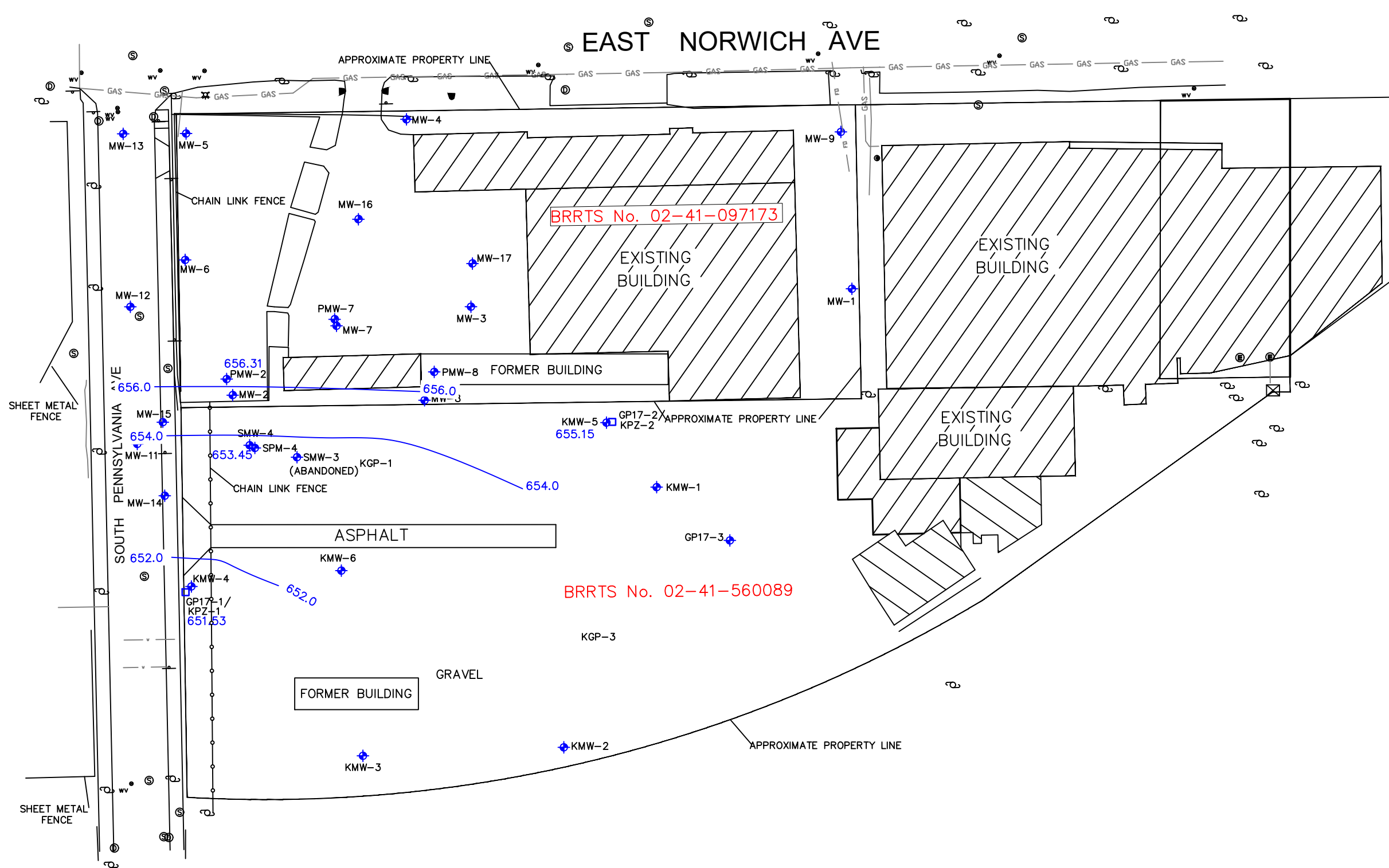
BRRTS No. 02-41-560089

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CADFILE	XREF
LMAN	

FIGURE 4
SHALLOW GROUNDWATER ELEVATION CONTOUR MAP - 04/14/2022
 2529 E. NORWICH AVENUE
 ST FRANCIS, WISCONSIN



BRRTS No. 02-41-000269

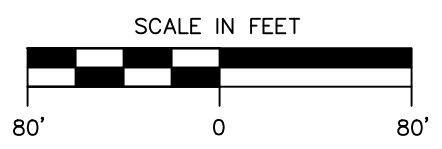


- - Denotes Soil Boring Location
- ◆ - Denotes Existing Monitoring Well
- - Denotes Existing Piezometer
- ⊙ - Denotes Existing Sewer Manhole
- ⊕ - Denotes Existing Power Pole
- ⊖ - Denotes Existing Water Valve
- ⊗ - Denotes Existing Hydrant
- ⊚ - Denotes Existing Electric Manhole
- ⊙ - Denotes Existing PVC Pipe/Culvert
- ⊙ - Denotes Existing Catch Basin

- - Denotes Existing Fiber Optic Line
- - Denotes Existing Electric Line
- - Denotes Existing Gas Line
- - Denotes Existing Water Line
- ⊙ - Denotes Existing Gas Meter

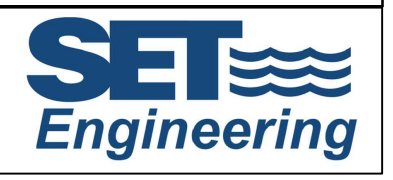
HYDRAULIC GRADIENT
 $\frac{dh}{dl} = 0.026 \text{ ft/ft}$

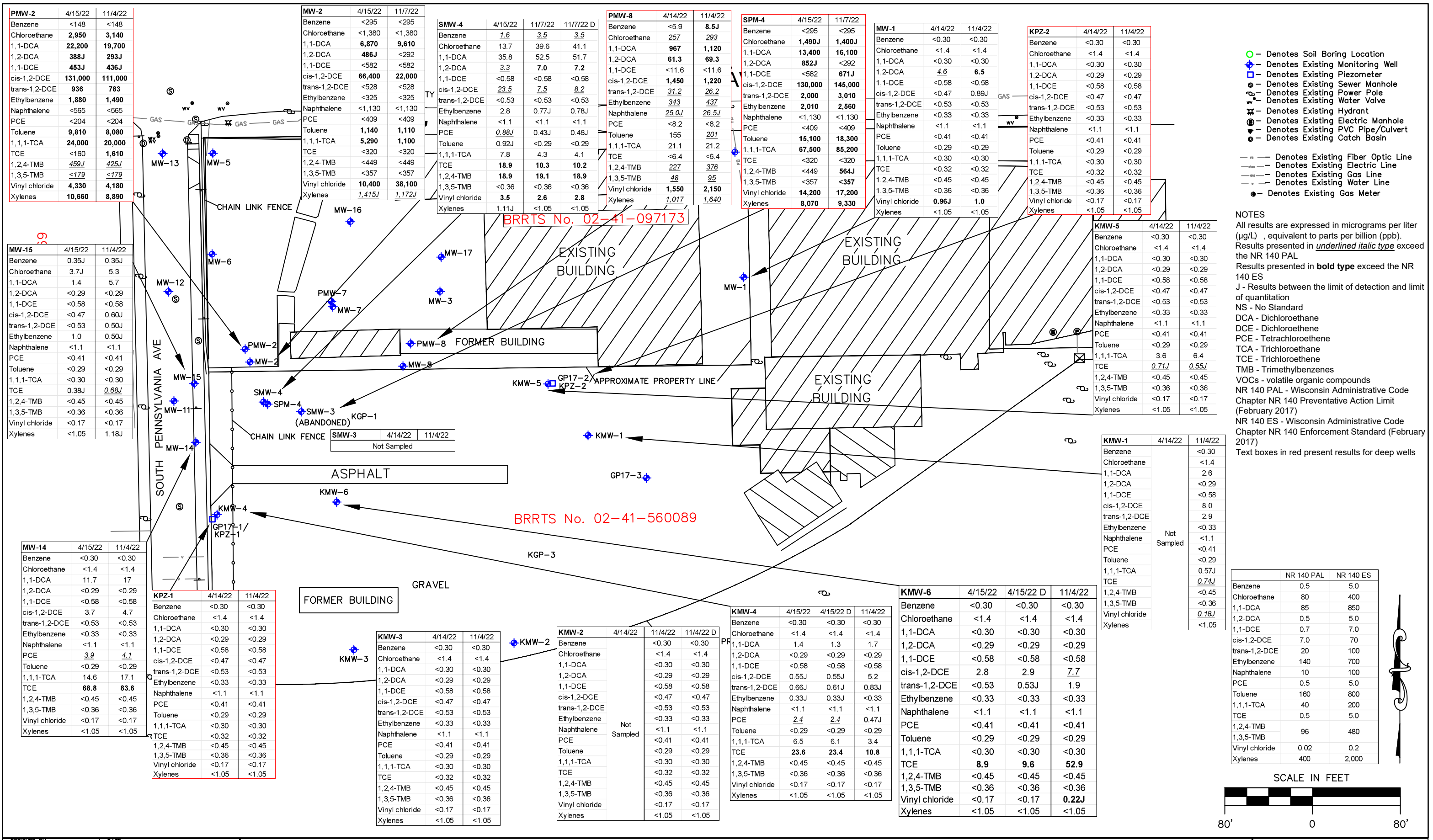
Inferred Groundwater Elevation Contour



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DRAWN BY	PROJECT
APPROVED BY	SHEET NO.
CADFILE	XREF
LMAN	

FIGURE 5
DEEP GROUNDWATER ELEVATION CONTOUR MAP - 04/14/2022
2529 E. NORWICH AVENUE
ST FRANCIS, WISCONSIN





- - Denotes Soil Boring Location
- ◆ - Denotes Existing Monitoring Well
- - Denotes Existing Piezometer
- ⊗ - Denotes Existing Sewer Manhole
- ⊕ - Denotes Existing Power Pole
- ⊖ - Denotes Existing Water Valve
- ⊗ - Denotes Existing Hydrant
- ⊕ - Denotes Existing Electric Manhole
- ⊖ - Denotes Existing PVC Pipe/Culvert
- ⊗ - Denotes Existing Catch Basin
- — - Denotes Existing Fiber Optic Line
- — - Denotes Existing Electric Line
- — - Denotes Existing Gas Line
- — - Denotes Existing Water Line
- - Denotes Existing Gas Meter

NOTES

All results are expressed in micrograms per liter (µg/L), equivalent to parts per billion (ppb). Results presented in italic type exceed the NR 140 PAL

Results presented in **bold type** exceed the NR 140 ES

J - Results between the limit of detection and limit of quantitation

NS - No Standard

DCA - Dichloroethane

DCE - Dichloroethene

PCE - Tetrachloroethene

TCA - Trichloroethane

TCE - Trichloroethene

TMB - Trimethylbenzenes

VOCs - volatile organic compounds

NR 140 PAL - Wisconsin Administrative Code Chapter NR 140 Preventative Action Limit (February 2017)

NR 140 ES - Wisconsin Administrative Code Chapter NR 140 Enforcement Standard (February 2017)

Text boxes in red present results for deep wells

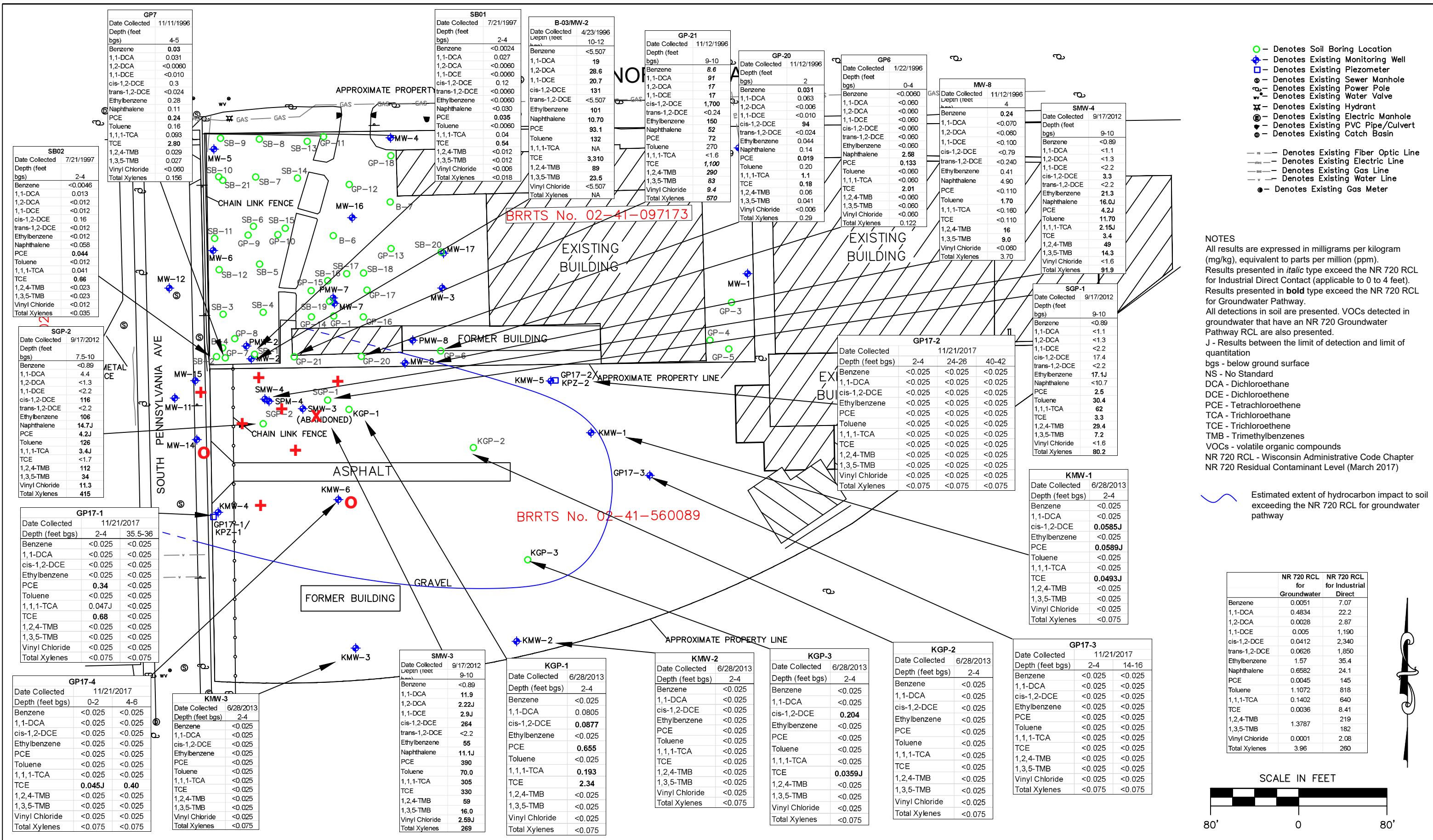
	NR 140 PAL	NR 140 ES
Benzene	0.5	5.0
Chloroethane	80	400
1,1-DCA	85	850
1,2-DCA	0.5	5.0
1,1-DCE	0.7	7.0
cis-1,2-DCE	7.0	70
trans-1,2-DCE	20	100
Ethylbenzene	140	700
Naphthalene	10	100
PCE	0.5	5.0
Toluene	160	800
1,1,1-TCA	40	200
TCE	0.5	5.0
1,2,4-TMB	96	480
1,3,5-TMB		
Vinyl chloride	0.02	0.2
Xylenes	400	2,000



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APPROVED BY	SHEET NO.
CADFILE	REF

FIGURE 6
GROUNDWATER SAMPLE ANALYTICAL RESULTS
 2529 E. NORWICH AVENUE
 ST FRANCIS, WISCONSIN



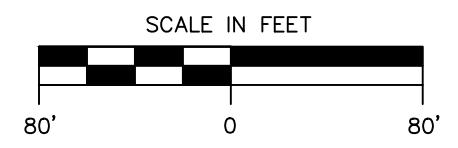


- - Denotes Soil Boring Location
- ⊕ - Denotes Existing Monitoring Well
- - Denotes Existing Piezometer
- ⊖ - Denotes Existing Sewer Manhole
- ⊙ - Denotes Existing Power Pole
- ⊕ - Denotes Existing Water Valve
- ⊕ - Denotes Existing Hydrant
- ⊕ - Denotes Existing Electric Manhole
- ⊕ - Denotes Existing PVC Pipe/Culvert
- ⊕ - Denotes Existing Catch Basin
- - Denotes Existing Fiber Optic Line
- - Denotes Existing Electric Line
- - Denotes Existing Gas Line
- - Denotes Existing Water Line
- ⊕ - Denotes Existing Gas Meter

NOTES
 All results are expressed in milligrams per kilogram (mg/kg), equivalent to parts per million (ppm). Results presented in *italic type* exceed the NR 720 RCL for Industrial Direct Contact (applicable to 0 to 4 feet). Results presented in **bold type** exceed the NR 720 RCL for Groundwater Pathway. All detections in soil are presented. VOCs detected in groundwater that have an NR 720 Groundwater Pathway RCL are also presented.
 J - Results between the limit of detection and limit of quantitation
 bgs - below ground surface
 NS - No Standard
 DCA - Dichloroethane
 DCE - Dichloroethene
 PCE - Tetrachloroethene
 TCA - Trichloroethane
 TCE - Trichloroethene
 TMB - Trimethylbenzenes
 VOCs - volatile organic compounds
 NR 720 RCL - Wisconsin Administrative Code Chapter NR 720 Residual Contaminant Level (March 2017)

Estimated extent of hydrocarbon impact to soil exceeding the NR 720 RCL for groundwater pathway

	NR 720 RCL for Groundwater	NR 720 RCL for Industrial Direct
Benzene	0.0051	7.07
1,1-DCA	0.4834	22.2
1,2-DCA	0.0028	2.87
1,1-DCE	0.005	1,190
cis-1,2-DCE	0.0412	2,340
trans-1,2-DCE	0.0626	1,850
Ethylbenzene	1.57	35.4
Naphthalene	0.6582	24.1
PCE	0.0045	145
Toluene	1.1072	818
1,1,1-TCA	0.1402	640
TCE	0.0036	8.41
1,2,4-TMB	1.3787	219
1,3,5-TMB	0.0001	182
Vinyl Chloride	0.0001	2.08
Total Xylenes	3.96	260



GP7	
Date Collected	11/11/1996
Depth (feet bgs)	4-5
Benzene	0.03
1,1-DCA	0.031
1,2-DCA	<0.0060
1,1-DCE	<0.010
cis-1,2-DCE	0.3
trans-1,2-DCE	<0.024
Ethylbenzene	0.28
Naphthalene	0.11
PCE	0.24
Toluene	0.16
1,1,1-TCA	0.093
TCE	2.80
1,2,4-TMB	0.029
1,3,5-TMB	0.027
Vinyl Chloride	<0.060
Total Xylenes	0.156

SB02	
Date Collected	7/21/1997
Depth (feet bgs)	2-4
Benzene	<0.0046
1,1-DCA	0.013
1,2-DCA	<0.012
1,1-DCE	<0.012
cis-1,2-DCE	0.16
trans-1,2-DCE	<0.012
Ethylbenzene	<0.012
Naphthalene	<0.058
PCE	0.044
Toluene	<0.012
1,1,1-TCA	0.041
TCE	0.66
1,2,4-TMB	<0.023
1,3,5-TMB	<0.023
Vinyl Chloride	<0.012
Total Xylenes	<0.035

SGP-2	
Date Collected	9/17/2012
Depth (feet bgs)	7.5-10
Benzene	<0.89
1,1-DCA	4.4
1,2-DCA	<1.3
1,1-DCE	<2.2
cis-1,2-DCE	116
trans-1,2-DCE	<2.2
Ethylbenzene	106
Naphthalene	14.7J
PCE	4.2J
Toluene	126
1,1,1-TCA	3.4J
TCE	<1.7
1,2,4-TMB	112
1,3,5-TMB	34
Vinyl Chloride	11.3
Total Xylenes	415

GP17-1	
Date Collected	11/21/2017
Depth (feet bgs)	2-4 35.5-36
Benzene	<0.025 <0.025
1,1-DCA	<0.025 <0.025
cis-1,2-DCE	<0.025 <0.025
Ethylbenzene	<0.025 <0.025
PCE	0.34 <0.025
Toluene	<0.025 <0.025
1,1,1-TCA	0.047J <0.025
TCE	0.68 <0.025
1,2,4-TMB	<0.025 <0.025
1,3,5-TMB	<0.025 <0.025
Vinyl Chloride	<0.025 <0.025
Total Xylenes	<0.075 <0.075

GP17-4	
Date Collected	11/21/2017
Depth (feet bgs)	0-2 4-6
Benzene	<0.025 <0.025
1,1-DCA	<0.025 <0.025
cis-1,2-DCE	<0.025 <0.025
Ethylbenzene	<0.025 <0.025
PCE	<0.025 <0.025
Toluene	<0.025 <0.025
1,1,1-TCA	<0.025 <0.025
TCE	0.045J 0.40
1,2,4-TMB	<0.025 <0.025
1,3,5-TMB	<0.025 <0.025
Vinyl Chloride	<0.025 <0.025
Total Xylenes	<0.075 <0.075

KMW-3	
Date Collected	6/28/2013
Depth (feet bgs)	2-4
Benzene	<0.025
1,1-DCA	<0.025
cis-1,2-DCE	<0.025
Ethylbenzene	<0.025
PCE	<0.025
Toluene	<0.025
1,1,1-TCA	<0.025
TCE	<0.025
1,2,4-TMB	<0.025
1,3,5-TMB	<0.025
Vinyl Chloride	<0.025
Total Xylenes	<0.075

SMW-3	
Date Collected	9/17/2012
Depth (feet bgs)	9-10
Benzene	<0.89
1,1-DCA	11.9
1,2-DCA	2.22J
1,1-DCE	2.9J
cis-1,2-DCE	264
trans-1,2-DCE	<2.2
Ethylbenzene	55
Naphthalene	11.1J
PCE	390
Toluene	70.0
1,1,1-TCA	305
TCE	330
1,2,4-TMB	59
1,3,5-TMB	16.0
Vinyl Chloride	2.59J
Total Xylenes	269

KGP-1	
Date Collected	6/28/2013
Depth (feet bgs)	2-4
Benzene	<0.025
1,1-DCA	0.0805
cis-1,2-DCE	0.0877
Ethylbenzene	<0.025
PCE	0.655
Toluene	<0.025
1,1,1-TCA	0.193
TCE	2.34
1,2,4-TMB	<0.025
1,3,5-TMB	<0.025
Vinyl Chloride	<0.025
Total Xylenes	<0.075

KMW-2	
Date Collected	6/28/2013
Depth (feet bgs)	2-4
Benzene	<0.025
1,1-DCA	<0.025
cis-1,2-DCE	<0.025
Ethylbenzene	<0.025
PCE	<0.025
Toluene	<0.025
1,1,1-TCA	<0.025
TCE	<0.025
1,2,4-TMB	<0.025
1,3,5-TMB	<0.025
Vinyl Chloride	<0.025
Total Xylenes	<0.075

KGP-2	
Date Collected	6/28/2013
Depth (feet bgs)	2-4
Benzene	<0.025
1,1-DCA	<0.025
cis-1,2-DCE	0.204
Ethylbenzene	<0.025
PCE	<0.025
Toluene	<0.025
1,1,1-TCA	<0.025
TCE	<0.025
1,2,4-TMB	<0.025
1,3,5-TMB	<0.025
Vinyl Chloride	<0.025
Total Xylenes	<0.075

GP17-3	
Date Collected	11/21/2017
Depth (feet bgs)	2-4 14-16
Benzene	<0.025 <0.025
1,1-DCA	<0.025 <0.025
cis-1,2-DCE	<0.025 <0.025
Ethylbenzene	<0.025 <0.025
PCE	<0.025 <0.025
Toluene	<0.025 <0.025
1,1,1-TCA	<0.025 <0.025
TCE	<0.025 <0.025
1,2,4-TMB	<0.025 <0.025
1,3,5-TMB	<0.025 <0.025
Vinyl Chloride	<0.025 <0.025
Total Xylenes	<0.075 <0.075

DESIGNED BY	DATE
DRAWN BY	11/27/2023
APPROVED BY	PROJECT
	e2203-0026-WO-0001
	SHEET NO.
	1
	CADFILE
	C:\Users\EvanKotowski\Desktop\Pen & Norwich Base_A3E_6.2.22.dwg
	XREF
	LMAN

+ direct push boring
o piezometer
x shallow monitoring well

FIGURE 7
PROPOSED BORING AND WELL LOCATION MAP
 2529 E. NORWICH AVENUE
 ST FRANCIS, WISCONSIN



Attachment 1

State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
Southeast Region Headquarters
2300 N. Dr. Martin Luther King, Jr. Drive
Milwaukee WI 53212-3128

Scott Walker, Governor
Cathy Stepp, Secretary
Eric Nitschke, Regional Director
Telephone 414-263-8500
FAX 414-263-8483
TTY 414-263-8713



February 14, 2013

Mid - America Steel Drum Company, Inc
Mike Higgins
8750 S. Chicago Road
Oak Creek, WI 53154

Subject: Reported Contamination at Mid – America Steel Drum Company, Inc./Kitzinger (Former),
2529 East Norwich Avenue, St. Francis
WDNR BRRTS Activity # 02-41-560089
WDNR FID # 241063570

Dear Mr. Higgins:

On February 12, 2013, Jim Kasdorf from Wisconsin Department of Natural Resources, on behalf of Mid – America Steel Drum Company, Inc. notified the Wisconsin Department of Natural Resources (“WDNR”) that soil and groundwater contamination had been detected at the site described above.

Based on the information that has been submitted to the WDNR regarding this site, we believe Mid – America Steel Drum Company, Inc. is responsible for investigating and restoring the environment at the above-described site under Section 292.11, Wisconsin Statutes, known as the hazardous substances spills law.

This letter describes the legal responsibilities of a person who is responsible under section 292.11, explains what you need to do to investigate and clean up the contamination, and provides you with information about cleanups, environmental consultants, possible financial assistance, and working cooperatively with the WDNR, Department Safety and Professional Services or the Department of Agriculture, Trade and Consumer Protection.

Legal Responsibilities:

Your legal responsibilities are defined both in statute and in administrative codes. The hazardous substances spill law, Section 292.11 (3) Wisconsin Statutes, states:

- **RESPONSIBILITY.** A person who possesses or controls a hazardous substance which is discharged or who causes the discharge of a hazardous substance shall take the actions necessary to restore the environment to the extent practicable and minimize the harmful effects from the discharge to the air, lands, or waters of the state.

Wisconsin Administrative Code chapters NR 700 through NR 749 establish requirements for emergency and interim actions, public information, site investigations, design and operation of remedial action systems, and case closure. Wisconsin Administrative Code chapter NR 140 establishes groundwater standards for contaminants that reach groundwater.

Steps to Take:

The longer contamination is left in the environment, the farther it can spread and the more it may cost to clean up. Quick action may lessen damage to your property and neighboring properties and reduce your costs in investigating and cleaning up the contamination. To ensure that your cleanup complies with Wisconsin's laws and administrative codes, you should hire a professional environmental consultant who understands what needs to be done. These are the first steps to take:

1. Within the next **30 days**, by March 18, 2013, you should submit written verification (such as a letter from the consultant) that you have hired an environmental consultant. If you do not take action within this time frame, the WDNR may initiate enforcement action against you.
2. Within the next **60 days**, by April 16, 2013, your consultant should submit a work plan and schedule for the investigation. The consultant must comply with the requirements in the NR 700 Wis. Adm. Code rule series and should adhere to current WDNR technical guidance documents.

In addition, within 30 days of completion of the site investigation, your consultant should submit a site investigation report to the department or other agency with administrative authority.

For sites with petroleum contamination, when your investigation has established the degree and extent of contamination, your consultant will be able to determine whether the Department of Commerce or the WDNR has authority over the case. For agrichemicals, your case will be transferred to the Department of Agriculture, Trade and Consumer Protection for oversight.

Sites where discharges to the environment have been reported are entered into the Bureau for Remediation and Redevelopment Tracking System ("BRRTS"), a version of which appears on the WDNR's internet site. You may view the information related to your site at any time (<http://dnr.wi.gov/botw/SetUpBasicSearchForm.do>) and use the feedback system to alert us to any errors in the data.

If you want a formal written response from the department on a specific submittal, please be aware that a review fee is required in accordance with ch. NR 749, Wis. Adm. Code. If a fee is not submitted with your reports, you should proceed under the advice of your consultant to complete the site investigation and cleanup to maintain your compliance with the spills law and chapters NR 700 through NR 749. **Do not delay the investigation of your site by waiting for an agency response.** We have provided detailed technical guidance to environmental consultants. Your consultant is expected to know our technical procedures and administrative rules and should be able to answer your questions on meeting cleanup requirements.

All correspondence regarding this site should be sent to:

Victoria Stovall
Environmental Program Associate
Remediation and Redevelopment Program
Wisconsin Department of Natural Resources
2300 N. Martin Luther King Dr.
Milwaukee, WI 53212 Victoria.Stovall@wisconsin.gov

Unless otherwise requested, please send only one copy of plans and reports. In addition to the paper copy, an electronic copy may also be submitted. To speed processing, correspondence should reference the BRRTS and FID numbers (if assigned) shown at the top of this letter.

Site Investigation and Vapor Pathway Analysis

As you develop the site investigation workplan, we want to remind you to include an assessment of the vapor intrusion pathway. Chapter NR 716, Wisconsin Administrative Code outlines the requirements for investigation of contamination in the environment. Specifically, s. NR 716.11(3)(a) requires that the field investigation determine the "nature, degree and extent, both areal and vertical, of the hazardous substances or environmental pollution in all affected media". In addition, section NR 716.11(5) specifies that the field investigation include an evaluation of the "pathways for migration of the contamination, including drainage improvements, utility corridors, bedrock and permeable material or soil along which vapors, free product or contaminated water may flow".

You will need to include documentation with the Site Investigation Report that explains how the assessment was done. If the pathway is being ruled out, then the report needs to provide the appropriate justification for reaching this conclusion. If the pathway cannot be ruled out, then investigation and, if appropriate, remedial action must be taken to address the risk presented prior to submitting the site for closure. The WDNR has developed guidance to help responsible parties and their consultants comply with the requirements described above. The guidance includes a detailed explanation of how to assess the vapor intrusion pathway and provides criteria which identify when an investigation is necessary. The guidance is available at: <http://dnr.wi.gov/files/PDF/pubs/rr/RR800.pdf>.

Additional Information for Site Owners:

We encourage you to visit our website at <http://dnr.wi.gov/topic/Brownfields/>, where you can find information on selecting a consultant, financial assistance and understanding the cleanup process. You will also find information there about liability clarification letters, post-cleanup liability and more.

If you have questions, call the DNR Project Manager Michele Norman at (414) 263-8546 for more information or visit the RR web site at the address above.

Thank you for your cooperation.

Sincerely,



Victoria Stovall
Environmental Program Associate
Remediation & Redevelopment Program

Selecting a Consultant – RR-502
<http://dnr.wi.gov/files/PDF/pubs/rr/RR502.pdf>

Environmental Services Contractor List – RR-024
<http://dnr.wi.gov/files/PDF/pubs/rr/RR024.pdf>
Environmental Contamination Basics, RR-674
<http://dnr.wi.gov/files/PDF/pubs/rr/RR674.pdf>

→ cc: WI DNR Case File

AD 241063570
BRTS# 02-41-560089

Notification For Hazardous Substance Discharge (Non-Emergency Only)

Form 4400-225 (05/12) Page 1 of 2

Emergency Discharges / Spills should be reported via the 24-Hour Hotline: 1-800-943-0003

Notice: Hazardous substance discharges must be reported immediately according to s. 292.11 Wis. Stats. Non-emergency hazardous substance discharges may be reported by telefaxing or e-mailing a completed report to the Department, or calling or visiting a Department office in person. If you choose to notify the Department by telefax or by email, you should use this form to be sure that all necessary information is included. However, use of this form is not mandatory. Under s. 292.99, Wis. Stats., the penalty for violating the reporting requirements of ch. 292 Wis. Stats., shall be no less than \$10 nor more than \$5000 for each violation. Each day of continued violation is a separate offense. It is not the Department's intention to use any personally identifiable information from this form for any purpose other than program administration. However, information submitted on this form may also be made available to requesters under Wisconsin's Open Records Law (ss. 19.31 - 19.39, Wis. Stats.).

Confirmatory laboratory data should be included with this form, to assist the DNR in processing this Hazardous Substance Release Notification.

Complete this form. **TYPE or PRINT LEGIBLY.** NOTIFY appropriate DNR region (see next page) **IMMEDIATELY** upon discovery of a potential release from (check one):

- Underground Petroleum Storage Tank System (additional information may be required for Item 6 below)
- Aboveground Petroleum Storage Tank System
- Dry Cleaner Facility
- Other - Describe: _____

ATTN DNR: **R & R Program Associate**

Date DNR Notified: _____

1. Discharge Reported By

Name JIM KASDORF	Firm WDNR	Phone No. (include area code) 414-263-8366
Mailing Address 2300 NORTH MARTIN LUTHER KING, JR. DRIVE MILWAUKEE, WI 53212		Email Address James.Kasdorf@Wisconsin.gov

2. Site Information

Name of site at which discharge occurred. Include local name of site/business, not responsible party name, unless a residence/vacant property.

MID-AMERICA STEEL DRUM COMPANY, INC. / KITZINGER (Former)

Location: Include street address, not PO Box. If no street address, describe as precisely as possible, i.e., 1/4 mile NW of CTHs 60 & 123 on E side of CTH 60.

2529 EAST NORWICH AVENUE

Municipality: (City, Village, Township) Specify municipality in which the site is located, not mailing address/city.

ST. FRANCIS

53235-4640

County: MILWAUKEE	Legal Description: 1/4 1/4 Sec 22 Tn 06 Range 22 E OW	WTM: X 692954 Y 271760
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3. Responsible Party (RP) and/or RP Representative

Responsible Party Name: Business or owner name that is responsible for cleanup. If more than one, list all. Attach additional pages as necessary.

MID-AMERICA STEEL DRUM COMPANY, INC.

Reported in compliance with s. 292.11(2), Wis. Stats., by a local government exempt from liability under s. 292.11(9)(e), Wis. Stats. For more information see <http://dnr.wi.gov/org/aw/rr/lgu/liability.htm>.

Contact Person Name (if different) MIKE HIGGINS	Phone Number 414-762-1114	Email Address	
Mailing Address 8750 S. CHICAGO ROAD OAK CREEK, WI	City OAK CREEK	State WI	ZIP Code 53154

Property owner if Different From RP: Business or owner name that is responsible for cleanup. If more than one, list all. Attach additional pages as necessary.

Contact Person Name (if different)	Phone Number	Email Address	
Mailing Address	City	State	ZIP Code

(continued)

4. Hazardous Substance Information

Identify hazardous substance discharged (check all that apply):

- | | | |
|--|---|---|
| <input checked="" type="checkbox"/> VOC's | <input type="checkbox"/> Diesel | <input type="checkbox"/> PERC (Dry Cleaners) |
| <input type="checkbox"/> PAH's | <input type="checkbox"/> Fuel Oil | <input type="checkbox"/> RCRA Hazardous Waste |
| <input type="checkbox"/> Metals (specify): _____ | <input type="checkbox"/> Gasoline | <input type="checkbox"/> Leachate |
| <input type="checkbox"/> Arsenic | <input type="checkbox"/> Hydraulic Oil | <input type="checkbox"/> Fertilizer |
| <input type="checkbox"/> Chromium | <input type="checkbox"/> Jet Fuel | <input type="checkbox"/> Pesticide/Herbicide/Insecticide(s) |
| <input type="checkbox"/> Cyanide | <input type="checkbox"/> Mineral Oil | <input checked="" type="checkbox"/> Other (specify): <u>TETRACHLOROETHENE</u> |
| <input type="checkbox"/> Lead | <input type="checkbox"/> Waste Oil | <input type="checkbox"/> Unknown |
| <input type="checkbox"/> PCB's | <input type="checkbox"/> Petroleum-Unknown Type | <u>TRICHLOROETHENE</u> |
| | | <u>CVOC'S</u> |

5. Impacts to the Environment Information

Enter "K" for known/confirmed or "P" for potential for all that apply.

- | | | |
|--|---|--|
| <input type="checkbox"/> Air Contamination | <input type="checkbox"/> Sanitary Sewer Contamination | <input checked="" type="checkbox"/> Soil Contamination |
| <input checked="" type="checkbox"/> Co-Contamination (Petroleum & Non-Petroleum) | <input type="checkbox"/> Contamination in Right of Way | <input type="checkbox"/> Storm Sewer Contamination |
| <input type="checkbox"/> Contamination Within 1 Meter of Bedrock | <input type="checkbox"/> Fire Explosion Threat | <input type="checkbox"/> Surface Water Contamination |
| <input type="checkbox"/> Contaminated Private Well | <input checked="" type="checkbox"/> Free Product | <input type="checkbox"/> Within 100 ft of Private Well |
| <input type="checkbox"/> Contaminated Public Well | <input checked="" type="checkbox"/> Groundwater Contamination | <input type="checkbox"/> Within 1000 ft of Public Well |
| <input type="checkbox"/> Contamination in Fractured Bedrock | <input checked="" type="checkbox"/> Off-Site Contamination | |
| | <input type="checkbox"/> Other (specify): _____ | |

Contamination was discovered as a result of:

- | | | |
|--|---|--|
| <input type="checkbox"/> Tank closure assessment | <input checked="" type="checkbox"/> Site assessment | <input type="checkbox"/> Other - Describe: _____ |
| Date <input type="text"/> | Date <u>9-17-2012</u> | Date <input type="text"/> |

Lab results: Lab results will be faxed upon receipt Lab results are attached

Additional Comments: Include a brief description of immediate actions taken to halt the release and contain or cleanup hazardous substances that have been discharged.

6. Federal Energy Act Requirements (Section 9002(d) of the Solid Waste Disposal Act (SWDA))

For all confirmed releases from UST's occurring after 9/30/2007 please provide the following information:

- | | <u>Source</u> | <u>Cause</u> |
|---|--|--------------|
| <input type="checkbox"/> Tank | <input checked="" type="checkbox"/> Spill | |
| <input type="checkbox"/> Piping | <input type="checkbox"/> Overfill | |
| <input type="checkbox"/> Dispenser | <input type="checkbox"/> Corrosion | |
| <input type="checkbox"/> Submersible Turbine Pump | <input type="checkbox"/> Physical or Mechanical Damage | |
| <input type="checkbox"/> Delivery Problem | <input type="checkbox"/> Installation Problem | |
| <input type="checkbox"/> Other (specify): _____ | <input type="checkbox"/> Other (does not fit any of above) | |
| <input type="checkbox"/> Does not apply. | <input checked="" type="checkbox"/> Unknown | |

Contact information to report non-emergency releases in DNR's five regions are as follows:

- Northeast Region (FAX: 920-662-5197); Attention -- R&R Program Associate: DNRRRNER@wisconsin.gov**
 Brown, Calumet, Door, Fond du Lac (except City of Waupun - see South Central Region), Green Lake, Kewaunee, Manitowoc, Marinette, Marquette, Menominee, Oconto, Outagamie, Shawano, Sheboygan, Waupaca, Waushara, Winnebago counties
- Northern Region (FAX: 715-623-6773); Attention -- R&R Program Associate: DNRRRNOR@wisconsin.gov**
 Ashland, Barron, Bayfield, Burnett, Douglas, Forest, Florence, Iron, Langlade, Lincoln, Oneida, Polk, Price, Rusk, Sawyer, Taylor, Vilas, Washburn counties
- South Central Region (FAX: 608-273-5610); Attention -- R&R Program Associate: DNRRRSCR@wisconsin.gov**
 Columbia, Dane, Dodge, Fond du Lac (City of Waupun only), Grant, Green, Iowa, Jefferson, Lafayette, Richland, Rock, Sauk, Walworth counties
- Southeast Region (FAX: 414-263-8550); Attention -- R&R Program Associate: DNRRRSER@wisconsin.gov**
 Kenosha, Milwaukee, Ozaukee, Racine, Washington, Waukesha counties
- West Central Region (FAX: 715-839-6076); Attention -- R&R Program Associate: DNRRRWCR@wisconsin.gov**
 Adams, Buffalo, Chippewa, Clark, Crawford, Dunn, Eau Claire, Jackson, Juneau, LaCrosse, Marathon, Monroe, Pepin, Pierce, Portage, St. Croix, Trempealeau, Vernon, Wood counties

TABLE 3
SUMMARY OF GROUNDWATER ANALYTICAL RESULTS
VOLATILE ORGANIC COMPOUNDS
Former D-F Incorporated Property
St. Francis, Wisconsin
Project Reference # 13097

Monitoring Well Identification:		NR 140		SMW-3	SMW-4	SPM-4	MW-1	MW-2	MW-3	MW-4	MW-5	MW-6	MW-7	MW-8	MW-9	MW-11	MW-12	MW-13	MW-14	MW-15	
Parameter	Unit	ES	PAL	Collection Date																	
				10/15/12	10/15/12	10/15/12	10/15/12	10/15/12	10/15/12	10/15/12	10/15/12	10/15/12	10/15/12	10/15/12	10/15/12	10/15/12	10/15/12	10/15/12	10/15/12	10/15/12	10/15/12
Benzene	µg/L	5.0	0.5	<250	(1,2) 5.8 ^J	<2500	<0.5	<1000	(2) 0.91 ^J	(2) 2.22	(2) 1.96	(1,2) 5.4 ^J			<2.5	<0.5					<50
Bromobenzene	µg/L	NS	NS	<370	<7.4	<3700	<0.74	<1480	<0.74	<0.74	<0.74	<7.4			<3.7	<0.74					<74
Bromodichloromethane	µg/L	0.6	0.06	<340	<6.8	<3400	<0.68	<1360	<0.68	<0.68	<0.68	<6.8			<3.4	<0.68					<68
Bromoform	µg/L	4.4	0.44	<215	<4.3	<2150	<0.43	<860	<0.43	<0.43	<0.43	<4.3			<2.15	<0.43					<43
tert-Butylbenzene	µg/L	NS	NS	<355	<7.1	<3550	<0.71	<1420	1.48 ^J	<0.71	<0.71	<7.1			<3.55	<0.71					<71
sec-Butylbenzene	µg/L	NS	NS	<500	<10	<5000	<1	<2000	<1	<1	<1	<10			16.9	<1					<100
n-Butylbenzene	µg/L	NS	NS	<450	17.9 ^J	<4500	<0.9	<1800	<0.9	<0.9	<0.9	<9			5.7 ^J	<0.9					<90
Carbon Tetrachloride	µg/L	5.0	0.5	<235	<4.7	<2350	<0.47	<940	<0.47	<0.47	<0.47	<4.7			<2.35	<0.47					<47
Chlorobenzene	µg/L	100	10	<255	<5.1	<2550	<0.51	<1020	<0.51	2.8	<0.51	<5.1			<2.35	<0.51					<51
Chloroethane	µg/L	400	80	<700	48	<7000	<1.4	<2800	2.93 ^J	27	<1.4	(1,2) 400			9.8 ^J	<1.4					<140
Chloroform	µg/L	6.0	0.6	<245	<4.9	<2450	<0.49	<980	<0.49	<0.49	<0.49	<4.9			<2.45	<0.49					<49
Chloromethane	µg/L	30	3.0	<950	<19	<9500	<1.9	<3800	<1.9	<1.9	<1.9	<19			<9.5	<1.9					<190
2-Chlorotoluene	µg/L	NS	NS	<350	<7	<3500	<0.7	<1400	<0.7	<0.7	<0.7	<7			<3.5	<0.7					<70
4-Chlorotoluene	µg/L	NS	NS	<220	<4.4	<2200	<0.44	<880	<0.44	<0.44	<0.44	<4.4			<2.2	<0.44					<44
1,2-Dibromo-3-Chloropropane	µg/L	0.2	0.02	<1400	<28	<14000	<2.8	<5600	<2.8	<2.8	<2.8	<28			<14	<2.8					<280
Dibromochloromethane	µg/L	60	6.0	<275	<5.5	<2750	<0.55	<1100	<0.55	<0.55	<0.55	<5.5			<2.75	<0.55					<55
1,4-Dichlorobenzene	µg/L	75	15	<490	<9.8	<4900	<0.98	<1960	<0.98	<0.98	<0.98	<9.8			<4.9	<0.98					<98
1,3-Dichlorobenzene	µg/L	600	120	<435	<8.7	<4350	<0.87	<1740	<0.87	<0.87	<0.87	<8.7			<4.35	<0.87					<87
1,2-Dichlorobenzene	µg/L	600	60	<380	<7.6	<3800	<0.76	<1520	<0.76	<0.76	<0.76	<7.6			<3.8	<0.76					<76
Dichlorodifluoromethane	µg/L	1,000	200	<900	<18	<9000	<1.8	<3600	<1.8	<1.8	<1.8	<18			<9	<1.8					<180
1,2-Dichloroethane	µg/L	5.0	0.5	(1,2) 320 ^J	(1,2) 30.1	<2500	(1,2) 9.3	<1000	(2) 0.55 ^J	(2) 2.31	(2) 0.92 ^J	<5			<2.5	<0.5					<50
1,1-Dichloroethane	µg/L	850	85	(1,2) 1840	(2) 116	(1,2) 12800 ^J	<0.98	(1,2) 4500 ^J	2.59 ^J	14.1	35	<9.8			67	<0.98					<98
1,1-Dichloroethene	µg/L	7.0	0.7	<300	<6	<3000	<0.6	<1200	<0.6	<0.6	<0.6	<6			<3	<0.6					<60
cis-1,2-Dichloroethene	µg/L	70	7.0	(1,2) 31100	(1,2) 640	(1,2) 283000	<0.74	(1,2) 120000	6.4	1.75 ^J	(2) 30.7	<7.4			(2) 21.6	<0.74					<74
trans-1,2-Dichloroethene	µg/L	100	20	<395	16.6 ^J	<3950	<0.79	<1580	<0.79	<0.79	<0.79	<7.9			<3.95	<0.79					<79
1,2-Dichloropropane	µg/L	5.0	0.5	<200	<4	<2000	<0.4	<800	<0.4	<0.4	<0.4	<4			<2	<0.4					<40
2,2-Dichloropropane	µg/L	NS	NS	<950	<19	<9500	<1.9	<3800	<1.9	<1.9	<1.9	<19			<9.5	<1.9					<190
1,3-Dichloropropane	µg/L	NS	NS	<355	<7.1	<3550	<0.71	<1420	<0.71	<0.71	<0.71	<7.1			<3.55	<0.71					<71
Di-Isopropyl ether	µg/L	NS	NS	<345	<6.9	<3450	<0.69	<1380	<0.69	<0.69	<0.69	<6.9			<3.45	<0.69					<69
EDB (1,2-Dibromoethane)	µg/L	0.05	0.005	<315	<6.3	<3150	<0.63	<1260	<0.63	<0.63	<0.63	<6.3			<3.15	<0.63					<63
Ethylbenzene	µg/L	700	140	(1,2) 950 ^J	(2) 199	<3900	<0.78	<1560	<0.78	<0.78	<0.78	<7.8			<3.9	<0.78					<78
Hexachlorobutadiene	µg/L	NS	NS	<1100	<22	<11000	<2.2	<4400	<2.2	<2.2	<2.2	<22			<11	<2.2					<220
Isopropylbenzene	µg/L	NS	NS	<460	15.2 ^J	<4600	<0.92	<1840	1.44 ^J	0.95 ^J	<0.92	<9.2			11.8 ^J	<0.92					<92
p-Isopropyltoluene	µg/L	NS	NS	<460	12.8 ^J	<4600	<0.92	<1840	<0.92	<0.92	<0.92	<9.2			<4.6	<0.92					<92
Methylene Chloride	µg/L	5.0	0.5	<550	<11	<5500	<1.1	<2200	<1.1	<1.1	<1.1	<11			<5.5	<1.1					<110
Methyl Tert Butyl Ether (MTBE)	µg/L	60	12	<400	<8	<4000	<0.8	<1600	<0.8	<0.8	<0.8	<8			<4	<0.8					<80
Naphthalene	µg/L	100	10	<1050	(1,2) 135	<10500	<2.1	<4200	<2.1	<2.1	<2.1	<21			<10.5	<2.1					<210
n-Propylbenzene	µg/L	NS	NS	<295	22.7	<2950	<0.59	<1180	<0.59	<0.59	<0.59	<5.9			9.4 ^J	<0.59					<59
1,1,2,2-Tetrachloroethane	µg/L	0.2	0.02	<265	<5.3	<2650	<0.53	<1060	<0.53	<0.53	<0.53	<5.3			<2.65	<0.53					<53
1,1,1,2-Tetrachloroethane	µg/L	70	7.0	<500	<10	<5000	<1	<2000	<1	<1	<1	<10			<5	<1					<100
Tetrachloroethene	µg/L	5.0	0.5	(1,2) 820	<4.4	<2200	<0.44	<880	<0.44	<0.44	<0.44	<4.4			<2.2	<0.44					<44
Toluene	µg/L	800	160	(1,2) 2500	(2) 320	(1,2) 19000	<0.53	(1,2) 1740 ^J	<0.53	<0.53	<0.53	<5.3			<2.65	<0.53					<53
1,2,4-Trichlorobenzene	µg/L	70	14	<750	<15	<7500	<1.5	<3000	<1.5	<1.5	<1.5	<15			<7.5	<1.5					<150
1,2,3-Trichlorobenzene	µg/L	NS	NS	<650	<13	<6500	<1.3	<2600	<1.3	<1.3	<1.3	<13			<6.5	<1.3					<130
1,1,1-Trichloroethane	µg/L	200	40	(1,2) 6700	(2) 77	(1,2) 96000	<0.85	(1,2) 17900	<0.85	1.28 ^J	3.3	<8.5			<4.25	<0.85					<85
1,1,2-Trichloroethane	µg/L	5.0	0.5	<235	<4.7	<2350	<0.47	<940	<0.47	<0.47	<0.47	<4.7			<2.35	<0.47					<47
Trichloroethene (TCE)	µg/L	5.0	0.5	(1,2) 1600	(1,2) 36	(1,2) 26000	<0.47	(1,2) 1820 ^J	<0.47	(1,2) 6.5	(1,2) 35	<4.7			(2) 3 ^J	<0.47				(1,2) 102 ^J	<170
Trichlorofluoromethane	µg/L	3,490	698	<850	<17	<8500	<1.7	<3400	<1.7	<1.7	<1.7	<17			<8.5	<1.7					<170
1,2,4-Trimethylbenzene	µg/L	**	**	440 ^J	257	<4000	<0.8	<1600	<0.8	<0.8	<0.8	13.9 ^J			<4	<0.8					<80
1,3,5-Trimethylbenzene	µg/L	**	**	<370	76	<3700	<0.74	<1480	<0.74	<0.74	<0.74	<7.4			<3.7	<0.74					<74
Total Trimethylbenzenes	µg/L	480	96	(1,2) 440 ^J	(2) 333	<4000	<0.8	<1600	<0.8	<0.8	<0.8	13.9 ^J			<4	<0.8					<80
Vinyl Chloride	µg/L	0.2	0.02	(1,2) 9700	(1,2) 122	(1,2) 12600	(1,2) 1.27	(1,2) 1820	(1,2) 35	(1,2) 2.73	(1,2) 17.5	(1,2) 2.2 ^J			(1,2) 160	<0.18					<18
Xylenes (total)	µg/L	2,000	400	(1,2) 4790	(2) 1380	(1,2) 8800 ^J	<1.1	<2200	<1.1	<1.1	<1.1	92			<5.5	<1.1					<110

Notes:
J = analyte detected between Limit of Detection and Limit of Quantitation
µg/L = micrograms per liter (equivalent to parts per billion)
NA = Not Analyzed NS = No Standard
NR 140 ES = Wisconsin Administrative Code, Chapter NR 140 Enforcement Standard
NR 140 PAL = Wisconsin Administrative Code, Chapter NR 140 Preventive Action Limit
Exceedances: BOLD = detected compound
(1) = concentration exceeds Chapter NR 140 ES
(2) = concentration exceeds Chapter NR 140 PAL

Free Product - Not Sampled

Well Not Found - No Site Access

Well Not Found - No Site Access

Well Not Found - No Site Access

Free Product - Not Sampled

Attachment 2



Milwaukee County GIS and Land Information

PARCEL REPORT FOR: 2529 E NORWICH AVE

Parcel Information

TAXKEY: 5849973001

ADDRESS: 2529 E NORWICH AVE

MUNICIPALITY: St. Francis

OWNER(S): 17H LLC

ACRES: 4.78

PARCEL TYPE: Single Taxkey

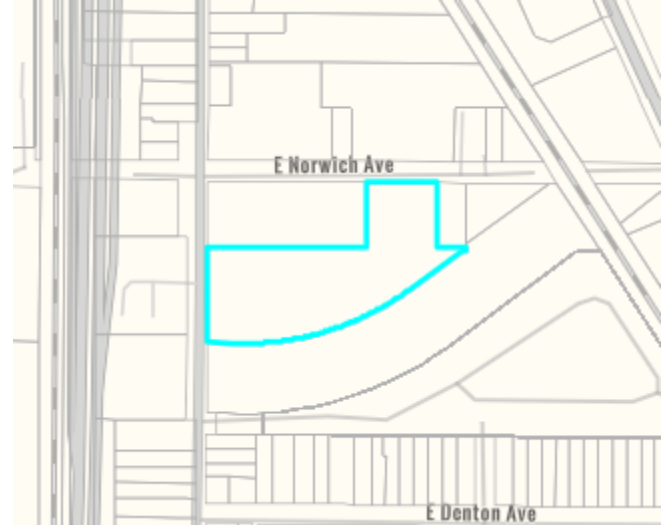
ZONING DESCRIPTION: [Industrial](#)

SCHOOL DISTRICT: SAINT FRANCIS SCHOOL DISTRICT

ASSESSED VALUE: [1057900](#)

LAND VALUE: 346000

IMPROVEMENT VALUE: 711900



LEGAL DESCRIPTION:

02529 E NORWICH AVE COM AT INTERSECTION
OF N LI OF WEP CO ROW & C/L OF S
PENNSYLVANIA AVE NE 1/4 SEC

This map is a user generated static output from an Internet mapping site and is for reference only.
Data layers that appear on this map may or may not be accurate, current, or otherwise reliable.



CITY OF SAINT FRANCIS
 3400 E. Howard Ave.
 St. Francis, WI 53235

Phone (414)481-2300
 Fax (414)481-6483

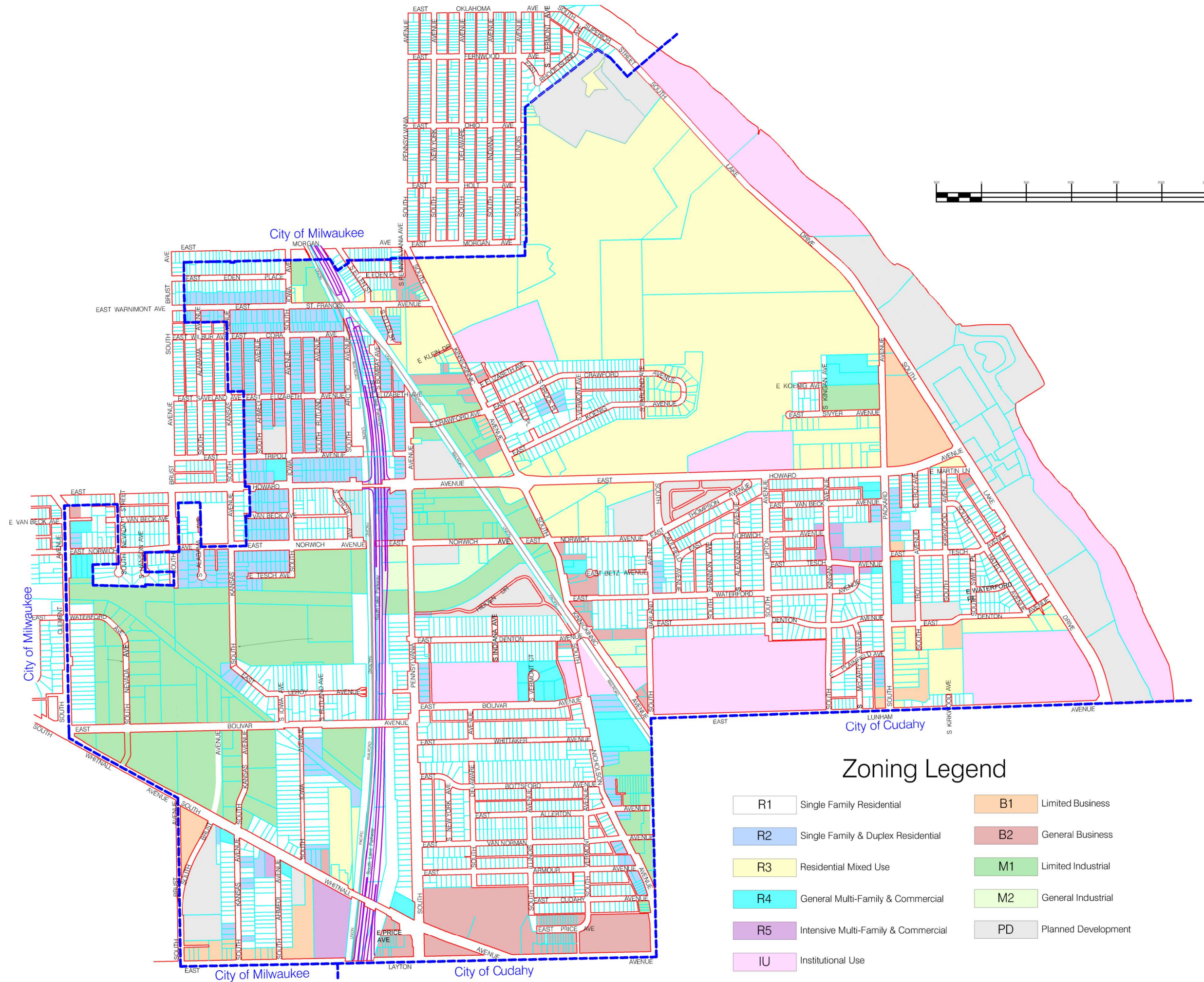
City Master Map

Zoning

City Maps Created by
St. Francis Engineering Department

2023

Scale
 1" = 500'



Zoning Legend

R1 Single Family Residential	B1 Limited Business
R2 Single Family & Duplex Residential	B2 General Business
R3 Residential Mixed Use	M1 Limited Industrial
R4 General Multi-Family & Commercial	M2 General Industrial
R5 Intensive Multi-Family & Commercial	PD Planned Development
IU Institutional Use	

Attachment 3

Kurt McClung

From: Grittner, Paul V - DNR <Paul.Grittner@wisconsin.gov>
Sent: Thursday, November 30, 2023 4:53 PM
To: Kurt McClung
Subject: Mid-America Steel Drum Company Inc/Kitzinger

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

SUBJECT: Mid-America Steel Drum Company Inc/Kitzinger,
2529 E Norwich Avenue, St. Francis, WI
WDNR FID #241063570; BRRTS # 02-41-560089

Kurt,

Thank you for organizing the meeting yesterday to discuss the status of the Kitzinger site, we appreciate your efforts to move this project towards completion. During our meeting the DNR confirmed that additional actions must be conducted before the site investigation could be approved.

We discussed what I thought would be the most important for determining the degree and extent of contamination, identifying potential source areas, migration pathways, and risks posed by the contamination, and for determining the need to conduct remedial actions. These included:

- Investigating soil contamination in the northwest corner of the property, mainly within the area west and north of KGP-2. This would include collect samples of shallow soil to assess the impact caused by potential surface spills.
- Evaluating soil data collected near the gate on the west side of the property near MW-10 and MW-14 to determine if additional investigation is needed in this area to define degree and extent of soil and groundwater contamination.
- Investigate the degree and extent of shallow groundwater contamination and develop a groundwater well network that would allow for contaminant trends to be established and to confirm groundwater flow. Minimally, this would include installing one or more monitoring wells where the most significant groundwater contamination is expected (as based on soil data and groundwater data collected from SMW-3).
- Determine the degree and extent of groundwater contamination below the watertable. Identify if there are sampling points up- and down-gradient of piezometer SPM-4, and consider if additional piezometers will be needed to define groundwater contamination at this depth.
- Samples may need to be collected below the screened interval of SPM-4 to identify the vertical extent of contamination.
- Conduct a vapor assessment to determine if contaminants in soil and groundwater could pose a risk to this or surrounding properties through vapor intrusion.
- Evaluate PFAS analytical data and discuss the potential source of this contamination and whether further investigation is needed.

Preparing a site investigation work plan for DNR review is recommended (with a review fee if a written DNR response is desired). Clearly discussing your interpretations of the existing data (including pertinent offsite data), the goals of the work being conducted, and the justification for the planned activities would help the DNR to understand how you plan

to move forward with the investigation and allow us to provide accurate and useful feedback. Providing cross-section figures of areas where the work is being conducted would help to demonstrate your interpretations of site conditions and justify the work being proposed.

Please contact me at the number or email below if you have any questions regarding this site.

We are committed to service excellence.

Visit our survey at <http://dnr.wi.gov/customersurvey> to evaluate how I did.

Paul Grittner

Hydrogeologist - Remediation and Redevelopment Program

Wisconsin Department of Natural Resources

Phone: (414) 405-0764

paul.grittner@wisconsin.gov

