



Stantec Consulting Services Inc.
12075 Corporate Parkway, Suite 200, Mequon WI 53092

March 31, 2021

Mr. Kevin McKnight
Wisconsin Department of Natural Resources
625 E County Road Y, Suite 700
Oshkosh, Wisconsin 54901

**Reference: City of New Holstein, Wisconsin - Demolition Plan
Former Tecumseh Products Company Building
1604 Michigan Avenue, New Holstein, Wisconsin
BRRTS: 02-08-363333
Stantec Project: 193705416**

Dear Mr. McKnight,

On behalf of the City of New Holstein (City), Stantec Consulting Services Inc. (Stantec) prepared this letter to outline planned activities associated with the proposed demolition of the former Tecumseh Products Company (Tecumseh) manufacturing facility located at 1604 Michigan Avenue in New Holstein, Wisconsin (the Site or the Property). The City is preparing the Site for redevelopment by demolishing the approximately 410,000 square foot former manufacturing building. The location of the abandoned Tecumseh building is shown on **Figure 1**. A detailed map of the building is included as **Figure 2**.

Background

The Property has been used to manufacture small and mid-sized steam and/or gasoline powered engines from at least the early 1930s to 2007. From 2007 to 2009, the Property was used by a local custom metal fabricator. Following 2009, the Property sat idle and was vacant until it was acquired by the City of New Holstein in December 2017 through tax foreclosure.

Extensive subsurface investigation activities have occurred at the property. Based on a review of the Wisconsin Department of Natural Resources (WDNR) Bureau of Remediation and Redevelopment Tracking System (BRRTS) database, there are 10 "closed" environmental repair program (ERP), leaking underground storage tank, or spills cases associated with the property, four miscellaneous listings related to "general property or where no action was required, and two open ERP cases. Contaminants identified as part of these database listings include chlorinated solvents, chromium, petroleum compounds (related to former underground storage tanks (USTs)) and per- and polyfluoroalkyl substances (PFAS)). A specific source related to chlorinated solvents has not been identified but is assumed to be related to the historic use for metal parts cleaning throughout the facility. Chlorinated solvent contamination has been identified in soil and groundwater beneath the property and extends off-site to the northeast of the facility. Petroleum contamination is present in soil and groundwater beneath the facility and is more localized to areas of former USTs. The chromium contamination is present on and off-site and resulted from discharges associated with a former plating line.

Based on a March 27, 2017 letter from the WDNR, the case (case #02-08-100332) encompassing the majority of contamination identified at the Property was listed as closed with continuing obligations, one of which being that the *current pavement, gravel cover, and building foundation must be maintained over contaminated soil and the WDNR notified and approve any changes*. A copy of the closure letter listing continuing obligations for the Property is provided in **Attachment**

Reference: New Holstein, Wisconsin – Demolition Plan
Former Tecumseh Products Company Site, 1604 Michigan Avenue, New Holstein, Wisconsin
BRRTS No.: 02-71-550735, 02-71-550733

A. A copy of the existing Cap Maintenance Plan for the Property is provided as **Attachment B**. Figure D.2 of this Cap Maintenance Plan depicts the location of the building and all other adjacent cap extents and compositions.

In 2018, a pre-demolition assessment of building materials was conducted on the former Tecumseh building in 2018 by NorthStar Environmental Testing, LLC (NorthStar) and documented by TetraTech, Inc. (TetraTech) in their Final Building Materials Assessment for the Property dated November 2018 (TetraTech, 2018). NorthStar concluded that asbestos containing building materials, lead based paint (LBP), and regulated wastes (RWs) are present which will require proper abatement and disposal ahead of scheduled demolition. A copy of Tetra Tech's report was provided to the WDNR on February 9, 2020.

A WDNR case associated with chromium contamination is listed as open. The City of New Holstein and Stantec have been in contact with the Tecumseh Products Company (responsible party for the case) and their consultant TRC Companies, Inc. (TRC) to discuss upcoming active remedial action activities and coordinate with planned demolition activities. TRC intends to implement remedial action activities immediately following demolition.

A WDNR case associated with identified PFAS contamination is also listed as open. Groundwater monitoring of a network of wells is ongoing.

Proposed Demolition Plan

The City plans to demolish the existing former Tecumseh manufacturing building to position the Site for redevelopment. Demolition activities are slated to occur during the Summer months of 2021. Contractor bids for the work are being solicited in March and April of 2021. Once a contractor is selected and the project awarded, initial actions will include the abatement of asbestos and removal of regulated wastes within the structure. Key topics pertinent to intended demolition plans are discussed below:

Monitoring Well Preservation

All monitoring wells adjacent to and within the footprint of the building will be identified prior to demolition and retained to allow for continued groundwater monitoring. The wells will be marked and protected during the demolition process.

Asbestos, Lead-based Paint, and Restricted Waste

The selected demolition contractor, or a designee, will be required to submit an asbestos renovation and demolition notification to the WDNR. Upon approval, the contractor will abate the majority of Category I and II asbestos and remove and properly dispose of RWs identified within the building prior to demolition. Building materials coated with LBP will not be abated. Following abatement, building demolition will commence. Demolition waste will be recycled (when possible) or transported to GFL Environmental's Hickory Meadows facility in Hilbert Wisconsin for disposal.

Concrete containing polychlorinated biphenyls (PCBs)

Demolition of the building will expose two former electrical transformer foundations (labeled as transformer (TR)-18 and TR-19 in the 2018 TetraTech report) confirmed to contain low levels of PCB residuals. The former transformer locations are illustrated on Figure A-2 of the 2018 TetraTech report. To address the risk of human exposure to these surfaces following demolition, the City intends to cover the area with plastic followed with two sheets of plywood

Reference: New Holstein, Wisconsin – Demolition Plan
Former Tecumseh Products Company Site, 1604 Michigan Avenue, New Holstein, Wisconsin
BRRTS No.: 02-71-550735, 02-71-550733

per area bolted to the concrete to create a protective barrier covering approximately 128 square feet (8 feet x 16 feet). The plastic and plywood barrier will be protective of public health, welfare, and the environment until the residual PCBs can be appropriately decontaminated or coated with approved materials as a part of future development. The barrier will be inspected during the annual cap maintenance inspections conducted for the Property and repaired or replaced as required.

Existing Interior Pits

Concrete lined pits which supported various past industrial operations are present within the building. TRC has requested these pits remain to better facilitate planned remedial actions to address a chromium release beneath the building. After demolition, the pits will be barricaded to address safety concerns while TRC completes remedial actions. Following TRC's work, the pits will be filled to grade with flowable fill or other clean material.

In the event the foundation pits contain water at the time of filling, pit water will need to be examined for obvious indications of contamination (i.e., odors, sheens, etc.), and sampled as appropriate for waste characterization purposes. Dewatered fluids will either be containerized for offsite disposal or pumped to a nearby sanitary sewer pending City approval.

Cap Inspection and Maintenance

To comply with the continuing obligations outlined in the WDNRs March 2017 letter, only above ground portions of the building will be removed. It is the City's intent to leave all existing concrete foundations and flooring in-place, and not disturb, to the extent practicable, current pavement, gravel cover, and building foundations/flooring.

During the demolition process, inspections of all Property caps will be conducted continuously to ensure their integrity is maintained during demolition. Any damage will be recorded on a WDNR *Continuing Obligation Inspection and Maintenance Log* (Form 4400-305) and repaired as soon as practical. Inspections will also be conducted after demolition is complete and will be continued annually thereafter. The cap inspections will ensure all portions of the newly exposed building slab continue to adequately protect public health, welfare, and the environment.

Site Access

A metal fence currently encompasses the Property to limit public access. It is the City's intent to maintain the fence throughout demolition activities so it can continue to be used to limit Site access in the future.

Post-Demolition Summary Report

Upon completion of demolition activities, Stantec will provide the WDNR a letter report summarizing completed activities at the Property. A revised Cap Maintenance Plan photolog depicting the actual state of the cap will also be included. Annual cap inspections will continue after demolition and will record issues and recommendations for cap repairs.



March 31, 2021
Page 4 of 4

Reference: New Holstein, Wisconsin – Demolition Plan
Former Tecumseh Products Company Site, 1604 Michigan Avenue, New Holstein, Wisconsin
BRRTS No.: 02-71-550735, 02-71-550733

We trust this information meets your needs. Please do not hesitate to contact us with any questions or comments.

Regards,

Stantec Consulting Services Inc.

A handwritten signature in blue ink, appearing to read 'Stu Gross'.

Stu Gross
Senior Project Manager
Cell: (414) 526-3974
Phone: (262) 643-9159
stu.gross@stantec.com

Enclosures

Figures

Figure 1 – Tecumseh Project Location

Figure 2 – Detailed Project Area

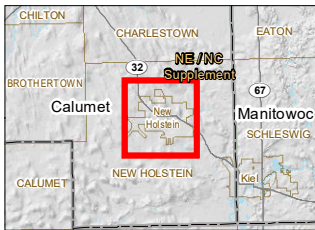
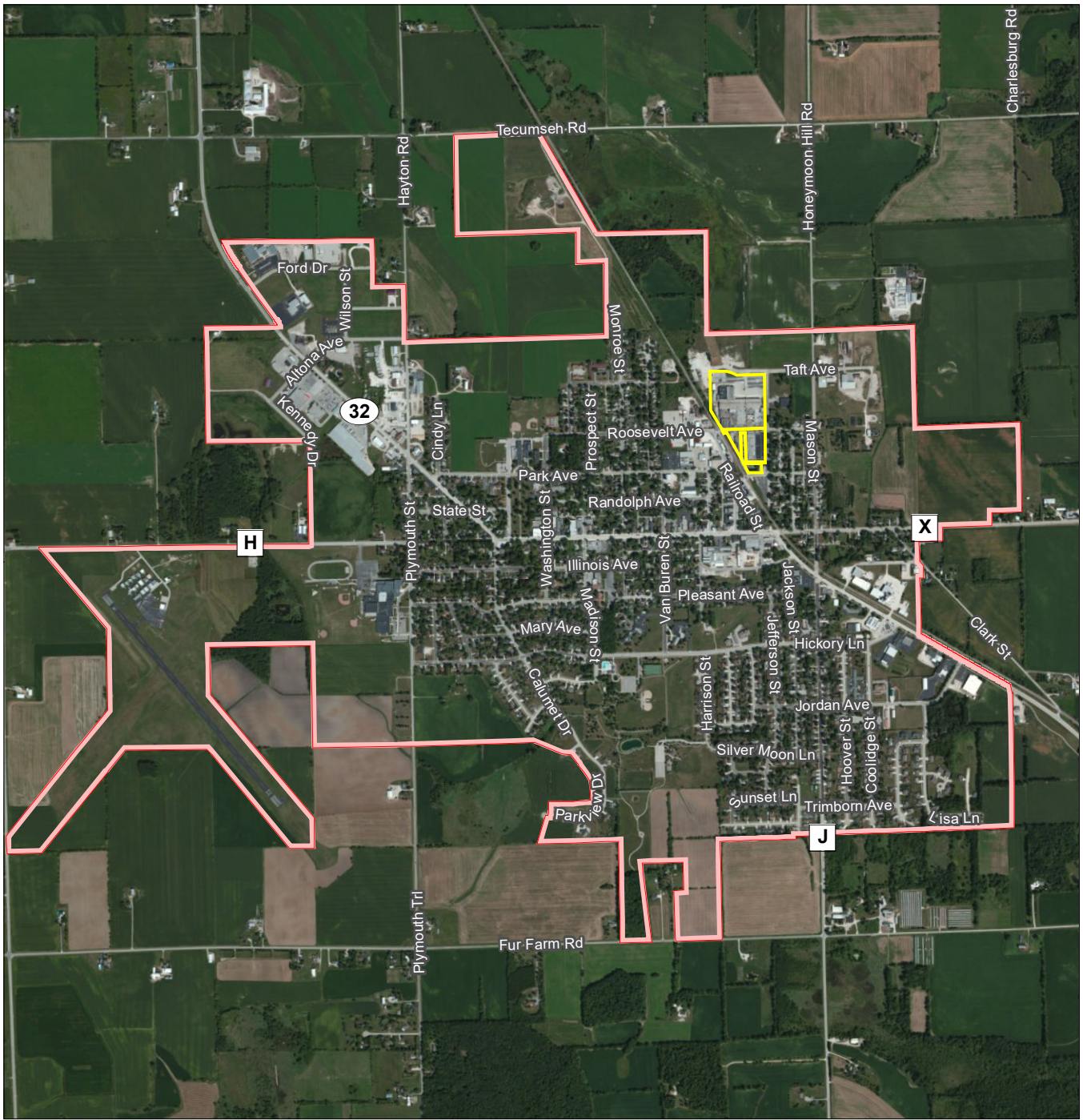
Attachments

Attachment A: BRRTS Case # 02-08-100332 Closure Letter

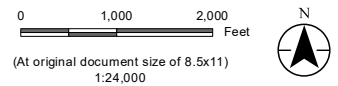
Attachment B: *Cap Maintenance Plan*

FIGURES

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- Legend**
- Former Tecumseh Building to be Demolished
 - New Holstein (City Limits)



Project Location: T17N, R20E, S10
 C. of New Holstein, Calumet Co., WI

Prepared by: **AJS** on 2020-06-05
TR by MP on 2020-06-05
IR by SG on 2020-06-12

Client/Project: **New Holstein**
Former Tecumseh Site
1604 Michigan Ave

193705416

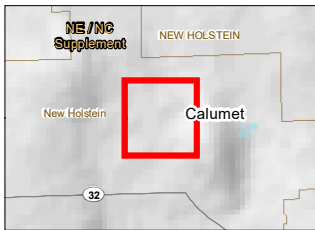
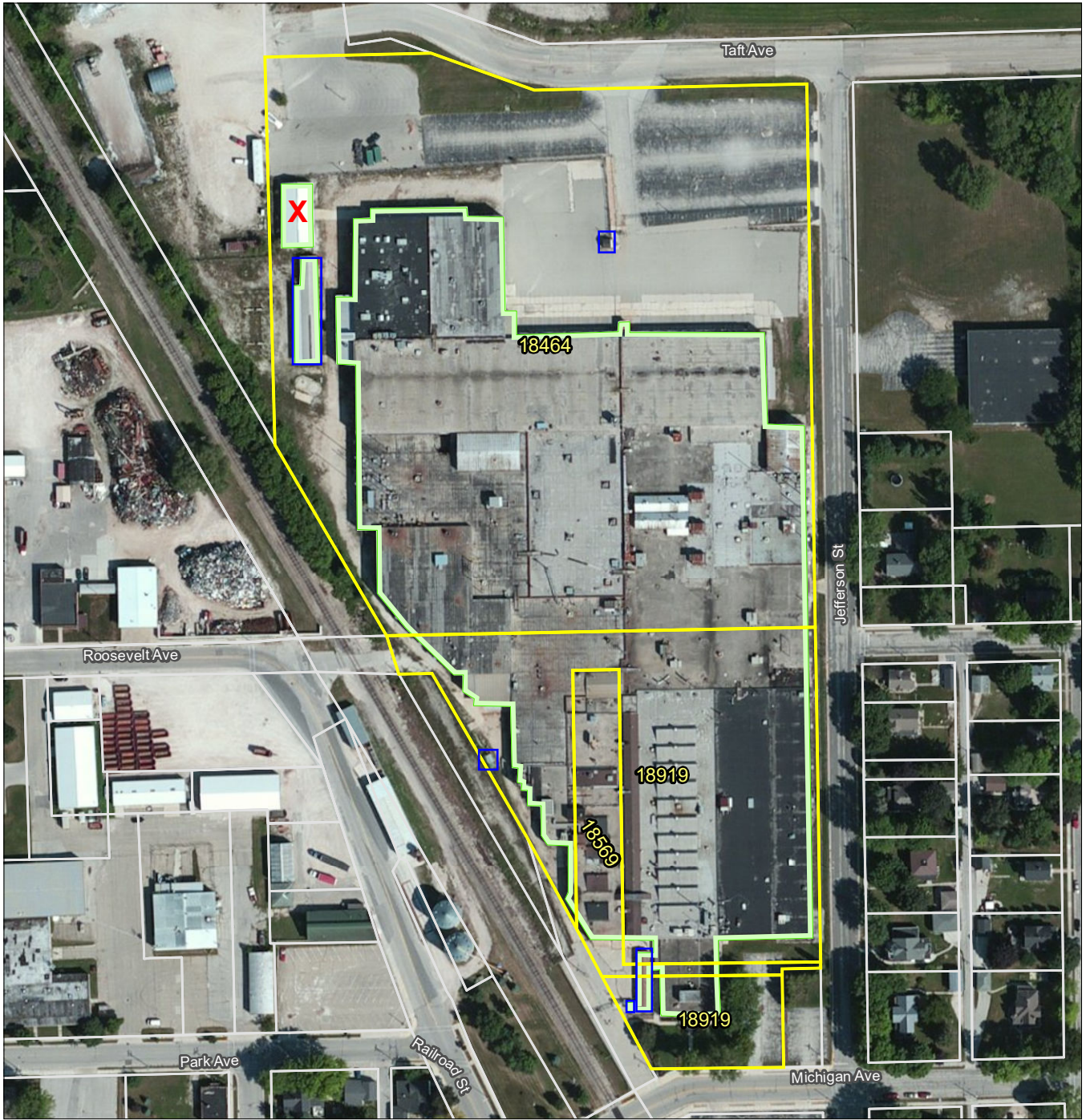
Figure No. **1**

Title
Tecumseh Project Location

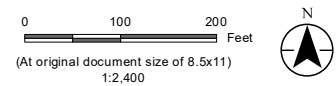
- Notes**
1. Coordinate System: NAD 1983 StatePlane Wisconsin Central FIPS 4802 Feet
 2. Data Sources: Stantec, WisDOT, WDNr, SCO
 3. Background: ESRI World Imagery Clarify

Disclaimer: This document has been prepared based on information provided by others as cited in the Notes section. Stantec has not verified the accuracy and/or completeness of this information and shall not be responsible for any errors or omissions which may be incorporated herein as a result. Stantec assumes no responsibility for data supplied in electronic format, and the recipient accepts full responsibility for verifying the accuracy and completeness of the data.

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- Legend**
- Project Parcel
 - Parcel Boundary
 - Former Tecumseh Plant Proposed for Demolition (Foundation to Remain)
 - X Removed Building
 - Outer Building to be Removed



Project Location Prepared by AJIS on 2020-06-05
 117N, R20E, S10 TR by MP on 2020-06-05
 C. of New Holstein, Calumet Co., WI IR by SG on 2020-06-12

Client/Project 193705416
 New Holstein Former
 Tecumseh Site 1604
 Michigan Ave

Figure No.
2

Title
Detailed Project Area

Notes
 1. Coordinate System: NAD 1983 StatePlane Wisconsin Central FIPS 4802 Feet
 2. Data Sources: Stantec, WisDOT, WDNR, SCO
 3. Orthophotography: ESRI World Imagery Clarity

Disclaimer: This document has been prepared based on information provided by others as cited in the Notes section. Stantec has not verified the accuracy and/or completeness of this information and shall not be responsible for any errors or omissions which may be incorporated herein as a result. Stantec assumes no responsibility for data supplied in electronic format, and the recipient accepts full responsibility for verifying the accuracy and completeness of the data.

ATTACHMENTS



ATTACHMENT A
BRRTS Case # 02-08-100332 Closure Letter



March 27, 2017

Tecumseh Products Company
Attn: Mr. S. Jason Smith
2700 West Wood Street
Paris TN 38242

Heus Acquisitions, LLC
Attn: Mr. Edward Jones
c/o Rightway Fasteners Inc
7945 South International Drive
Columbus, IN 47201

KEEP THIS DOCUMENT WITH YOUR PROPERTY RECORDS

SUBJECT: Final Case Closure with Continuing Obligations - Updated
Tecumseh Products Co Inc - West, 1604 Michigan Avenue, New Holstein WI
DNR BRRTS Activity #: 02-08-100332

Dear Mr. Smith and Mr. Jones:

The Department of Natural Resources (DNR) considers the Tecumseh Products Co Inc - West contamination case closed, with continuing obligations. No further investigation or remediation is required at this time. However, you, future property owners, and occupants of the property must comply with the continuing obligations as explained in the conditions of closure in this letter. Please read over this letter closely to ensure that you comply with all conditions and other on-going requirements. Provide this letter and any attachments listed at the end of this letter to anyone who purchases, rents or leases this property from you. Certain continuing obligations also apply to affected property owners or rights-of-way holders. These are identified within each continuing obligation.

This final closure decision is based on the correspondence and data provided, and is issued under chs. NR 726 and 727, Wis. Adm. Code. The Northeast Region (NER) Closure Committee reviewed the request for closure on October 6, 2016. The DNR Closure Committee reviewed this environmental remediation case for compliance with state laws and standards to maintain consistency in the closure of these cases.

The site is an unoccupied former manufacturing facility. This case relates to chlorinated solvent contamination identified site wide from site operations. Remedial action consisted of natural attenuation groundwater monitoring. The conditions of closure and continuing obligations required were based on the property being used for commercial or industrial purposes. Groundwater contamination from this case is co-mingled with petroleum and xylene contamination from BRRTS# 03-08-001071.

Monitoring well MW-24 is being transferred for continued monitoring as part of the Tecumseh Products Co – New Holstein site, BRRTS# 02-08-363333, that remains open at the property where the responsible party is also Tecumseh Products Company. Do NOT fill and seal this well at this time. Well filling and sealing will be required as part of the Tecumseh Products Co– New Holstein closure, upon conclusion of the cleanup of that site. This well is identified on the attached map [Figure B.3.d, Monitoring Well Map, July 2016](#).

Continuing Obligations

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

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

- One or more monitoring wells were not located and must be properly filled and sealed if found.
- Current pavement, gravel cover and building foundation must be maintained over contaminated soil and the DNR must be notified and approve any changes to this barrier.
- Remaining contamination could result in vapor intrusion if future construction activities occur. Future construction includes expansion or partial removal of current buildings as well as construction of new buildings. Vapor control technologies will be required for occupied buildings, unless the property owner assesses the potential for vapor intrusion, and the DNR agrees that vapor control technologies are not needed.
- Remaining contamination presents a vapor intrusion risk. Notification to the DNR is required prior to occupancy of buildings on the site. Installation, testing and operation of a vapor mitigation system are required for occupied buildings. Vapor control technologies are required prior to human occupancy of buildings, unless the property owner assesses current conditions, and the DNR agrees that vapor control technologies are not needed. Noncompliance with these actions may result in reopening of the site (rescinding the closure approval).

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

GIS Registry

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

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

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

Prohibited Activities

Certain activities are prohibited at closed sites because maintenance of a barrier is intended to prevent contact with any remaining contamination. When a barrier is required, the condition of closure requires notification of the DNR before making a change, in order to determine if further action is needed to maintain the protectiveness of the remedy employed. The following activities are prohibited on any portion of the property where pavement or a building foundation, is required, as shown on the attached map Figure D.2, Cap Maintenance Plan Map, March 2017, unless prior written approval has been obtained from the DNR:

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

Closure Conditions

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

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

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

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

Groundwater contamination greater than enforcement standards is present both on this contaminated property and off this contaminated property, as shown on the attached map Figure B.3.b.i CVOC Concentrations October 2015, July 2016. If you intend to construct a new well, or reconstruct an existing well, you'll need prior DNR approval. Affected property owners and right-of-way holders were notified of the presence of groundwater contamination. This continuing obligation also applies to the property owners and ROW holders identified in Table G.1, Notification to Owners of Affected Properties attached to this letter.

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

Soil contamination remains as indicated on the attached map Figure B.2.b, Residual Soil Contamination, October 2016. If soil in the specific locations described above is excavated in the future, the property owner or right-of-way holder at the time of excavation must sample and analyze the excavated soil to determine if contamination remains. If sampling confirms that contamination is present, the property owner or right-of-way holder at the time of excavation will need to determine whether the material is considered solid or hazardous waste and ensure that any storage, treatment or disposal is in compliance with applicable standards and rules. Contaminated soil may be managed in accordance with ch. NR 718, Wis. Adm. Code, with prior DNR approval. This continuing obligation also applies to the ROW holders for Jefferson Street.

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

Monitoring Wells that could not be Properly Filled and Sealed (ch. NR 141, Wis. Adm. Code)

Monitoring well MW-16 located on City of New Holstein ROW shown on the attached map, Figure B.3.d Monitoring Well Map, could not be properly filled and sealed because they were missing due to being paved over, covered or removed during site development activities. Your consultant made a reasonable effort to locate the well and to determine whether it was properly filled and sealed, but was unsuccessful. You may be held liable for any problems associated with the monitoring wells if they create a conduit for contaminants to enter groundwater. If the groundwater monitoring well is found, the then current owner of the property on which the well is located is required to notify the DNR, to properly fill and seal the well and to submit the required documentation to the DNR.

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

The pavement, building and pervious cover that exists in the location shown on the attached map Figure D.2, Cap Maintenance Plan Map, March 2017, shall be maintained in compliance with the attached maintenance plan in order to minimize the infiltration of water and prevent additional groundwater contamination that would violate the groundwater quality standards in ch. NR 140, Wis. Adm. Code, and to prevent direct contact with residual soil contamination that might otherwise pose a threat to human health.

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

A request may be made to modify or replace a cover or barrier. Before removing or replacing the cover, you must notify the DNR at least 45 days before taking an action. The replacement or modified cover or barrier must be protective of the revised use of the property, and must be approved in writing by the DNR prior to implementation. A cover or barrier for industrial land uses, or certain types of commercial land uses may not be protective if the use of the property were to change such that a residential exposure would apply. This may include, but is not limited to single or multiple family residences, a school, day care, senior center, hospital or similar settings. In addition, a cover or barrier for multi-family residential housing use may not be appropriate for use at a single family residence.

The attached maintenance plan and inspection log (DNR form 4400-305) are to be kept up-to-date and on-site. Inspections shall be conducted annually, in accordance with the attached maintenance plan. Submit the inspection log to the DNR annually, starting one year after the date of this letter.

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

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

Vapor Mitigation Required Prior to Human Occupancy: Chlorinated VOC's remain in soil and groundwater, as shown on the attached map Figure B.3.b.i CVOC Concentrations October 2015, July 2016 and Figure B.2.b, Residual Soil Contamination, October 2016, at levels that are of concern for human occupancy of buildings on this site/property. At the time of closure, no risk was present as the buildings were not occupied. As a condition of closure approval, the property owner must notify the DNR at least 45 days before a building may become occupied, and submit a proposal for the installation, testing and operation of a vapor mitigation system for approval. Approval of the design, installation, effectiveness testing and operation of a vapor mitigation system is required prior to human occupation unless the property owner assesses the vapor pathway and DNR agrees that vapor control technologies are not needed. In addition, the property owner must report on the status of human occupancy of the buildings upon request by the DNR.

Future Concern: Chlorinated VOC contamination remains in soil and groundwater at, as shown on the attached maps Figure B.3.b.i CVOC Concentrations October 2015, July 2016 and Figure B.2.b, Residual Soil Contamination, October 2016, at levels that may be of concern for vapor intrusion in the future, depending on construction and occupancy of a building. Therefore, before a building is constructed and/or an existing building is modified, the property owner must notify the DNR at least 45 days before the change. Vapor control technologies are required for construction of occupied buildings unless the property owner assesses the vapor pathway and DNR agrees that vapor control technologies are not needed.

Other Closure Information

General Wastewater Permits for Construction Related Dewatering Activities

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

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

Chapter NR 140, Wis. Adm. Code Exemption

Recent groundwater monitoring data at this site indicates that for Trichloroethene (TCE) at MW-36DD, contaminant levels exceed the NR 140 preventive action limit (PAL) but are below the enforcement standard (ES). The DNR may

grant an exemption to a PAL for a substance of public health concern, other than nitrate, pursuant to s. NR 140.28 (2) (b), Wis. Adm. Code, if all of the following criteria are met:

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

Based on the information you provided, the DNR believes that these criteria have been or will be met due to the groundwater monitoring history. Therefore, pursuant to s. NR 140.28, Wis. Adm. Code, an exemption to the PAL is granted for TCE at MW-36DD. Please keep this letter, because it serves as your exemption. MW-36DD is located on the McShaw property on Honeymoon Hill Road.

In Closing

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

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

The DNR appreciates your efforts to restore the environment at this site. If you have any questions regarding this closure decision or anything outlined in this letter, please contact Kevin McKnight at 920-424-7890, or at kevin.mcknight@wisconsin.gov.

Sincerely,



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

Attachments:

- Figure B.3.b.i CVOC Concentrations October 2015, July 2016
- Figure B.2.b, Residual Soil Contamination, October 2016
- Figure B.3.d, Monitoring Well Map, March 2016
- Figure D.2, Cap Maintenance Plan Map, March 2017
- Table G.1, Notifications to Owners of Affected Properties
- Attachment D, Cap Maintenance Plan, May 2016
- Inspection log, DNR Form 4400-305

cc: file
Tom Stoltzenberg, TRC – via email
Joseph McShaw
Bill Phelps, DG/5



ATTACHMENT B

Cap Maintenance Plan

Cap Maintenance Plan

Former Tecumseh Products Company

1604 Michigan Avenue

New Holstein, Wisconsin

WDNR BRRTS #02-08-100332 & #03-08-001071

Prepared For:

Tecumseh Products Company

2700 West Wood Street

Paris, TN 38242

May 2016

Prepared by:



Madison, Wisconsin

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FIGURES

Figure 1 Cap Maintenance Plan Map

APPENDICES

Appendix A Property Deed

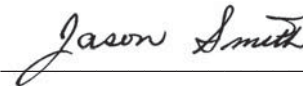
Appendix B Inspection Checklist, Logs, and Photographs

1.0 PROPERTY AND PLAN INFORMATION

1.1 Site Information

- **Site Location:** 1604 Michigan Avenue
New Holstein, WI 53061
- **Tax Parcel ID #s:** 18450, 18464, 18465, 18568, 18569, 18919,
18920, & 18921
- **WDNR/FID #:** 408020690
- **WDNR BRRTS/Activity #:** 02-08-100332 & 03-08-001071
- **Legal Description:** See Property Deed in **Appendix A**

1.2 Contact/Notification Information

- **Site Owner and Operator:** Edward Jones of Heus Acquisitions, LLC
12629 Chancery Lane
Fishers, IN 46037
815-847-0663
- **Additional Responsible Party:** Tecumseh Products Company
5683 Hines Drive
Ann Arbor, MI 48108
734-585-9500
- **Signature:** 
S. Jason Smith
- **Consultant:** TRC Environmental Corporation
708 Heartland Trail, Suite 3000
Madison, WI 53717
(608) 826-3600
- **WDNR:** Kevin McKnight
625 E County Rd. Y
Oshkosh, WI 54901
(920) 424-7890

Notify the WDNR at least 45 days in advance of any changes in land or property use or system modifications.

1.3 Purpose

This document is the Cap Maintenance Plan (Plan) for the above-referenced site, prepared in accordance with the requirements of s. NR 724.13(2), Wisconsin Administrative Code. The current cap consists of a combination of building foundation, asphalt pavement, gravel, and grass. The cap limits infiltration of surface water and direct contact with any underlying soil that may be contaminated from historical operations on the property.

This Plan was enclosed with a Deed Notice and Property-Use Restriction. Please refer to this Plan for additional information on the continuing obligations for the site. The specific monitoring and maintenance requirements are included in Appendix B. If the lot is acquired by a new owner, this Plan with the appropriate attachment(s) can be transferred to the new owner.

The property owner will maintain a copy of this Plan and make it available to all interested parties (i.e., WDNR on-site employees, contractors, future property owners, etc.) for viewing.

1.4 Prohibited Activities

The following activities are prohibited unless prior approval is received from Tecumseh Products Company (only until site closure) and WDNR:

- Removal or modification of cap
- Replacement of cap with another barrier of another type
- Excavating or grading of the land surface
- Filling on covered or paved areas
- Plowing or agricultural cultivation
- Construction or placement of a building or other structure
- Occupation of the site
- Installation of a water well.

Additional testing may be completed to support the WDNR's approval of the aforementioned activities.

1.5 Notifications

Notify Tecumseh Products Company (only until site closure) and WDNR at least 45 days in advance of any changes in occupancy, land or property use, or system modifications.

In the event that necessary maintenance activities expose the underlying soil, the property owner will notify the maintenance workers of potential direct contact exposure hazard.

Replacement of all or portions of the cap with similar or superior materials (e.g., replacing asphalt with concrete) is allowable, but notification and documentation of the change in conditions must be provided to Tecumseh Products Company (only until site closure) and WDNR.

1.6 Amendment or Withdrawal of Cap Maintenance Plan

This Plan can be amended or withdrawn by the property owner and its successors with the written approval of Tecumseh Products Company (only until site closure) and WDNR.

2.0 CAP MAINTENANCE PLAN

2.1 Contamination Description

Historical small engine manufacturing operations at the facility resulted in petroleum and chlorinated solvent impacts to soil, groundwater, and soil vapor. Petroleum impacts were the result of leaking storage tanks, while the chlorinated solvents were used for metal parts cleaning. Residual contamination from historical operations remains on-site. Some petroleum and chlorinated volatile organic compounds (PVOCs & CVOCs) remain below the facility at levels greater than NR 720 industrial direct contact residual contaminant levels (RCL) for soil, NR 140 enforcement standards (ES) for groundwater, and U.S. EPA large commercial/industrial risk screening levels (RSL) for vapor.

The locations of soil vapor, soil, and groundwater known to contain exceedances above their respective RSLs, RCLs, and ESs are shown on Figure 1. The existing cap aids to protect human health and the environment from the residual PVOC and CVOC contamination.

2.2 Cap Description

The existing cap over the site prevents direct contact with PVOC and CVOC contamination, reduces the possibility of infiltration through contaminated material, and reduces upward migration of sub-slab vapors. These surface features that comprise the cap are shown on **Figure 1**. A majority of the site is capped with an impermeable surface approximately 6 inches thick consisting of building foundations, asphalt pavement, or concrete.

Photographs of the current conditions of the cap are included in **Appendix B**. Based on the current and future use of the property, the cap should function as intended unless disturbed.

2.3 Cap Inspection

The cap needs to be inspected annually by the property owner or their designated representative. An inspection checklist is provided in the **Appendix B**. The inspections will check that the cap remains intact as intended to mitigate the risk to human health and the environment.

The current site cover overlying the soil vapor, soil, and groundwater impacted areas, as depicted in Figure 1, will be inspected once a year. The inspections will be performed to evaluate damage due to settling, exposure to weather, wear from traffic, or other factors. Any area where soils have become or are likely to become exposed will be documented.

A log of the inspections and any repairs will be maintained by current and future property owner(s). An inspection log for the cap is provided in **Appendix B**. The inspection log and record of the repairs/maintenance will be kept on site, and will be made available to all interested parties (e.g., WDNR, on-site employees, contractors, future property owners).

2.4 Occupancy Restriction

The existing cap aids to protect human health and the environment from the residual PVOC and CVOC contamination. However, the protectiveness is dependent on the site classification as an industrial and unoccupied site. If the currently vacant building is occupied in the future, vapor intrusion may become an issue. Notification of the WDNR will be required before occupation, construction, or changing the use of the existing building. The use of vapor control technologies or an assessment of the potential for vapor intrusion will be required at that time.

In addition to cap maintenance inspection notifications, the property owner will be responsible for supplying the WDNR with annual confirmation that the site remains unoccupied in order to ensure protectiveness from vapor intrusion.

2.5 Maintenance

If damage to the cap is noted during the inspections, or at any other time during the year, repairs will be scheduled as soon as practical. Damage to the cap are significant deficiencies that allow surface water infiltration and direct contact with contaminated soil. (Small cracks or gaps in the cap do not need to be immediately addressed, so long as the overall integrity of the cap is ensured.)

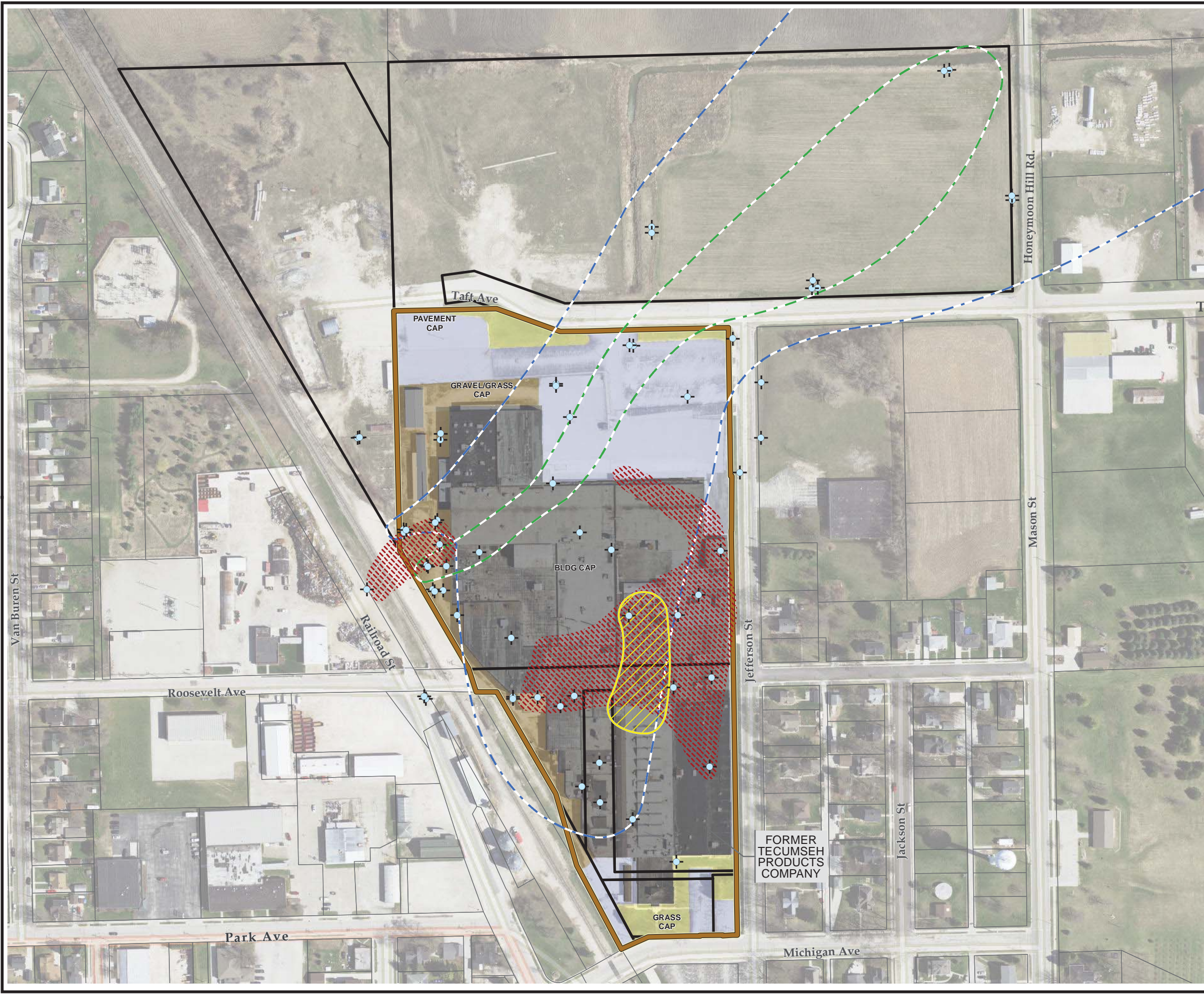
Repairs to the cap may include, but are not limited to, patching and filling significant cracks, resurfacing sections of the site, or filling areas of erosion observed in vegetated areas. In the event the paved surfaces, or buildings overlying the contaminated soil are removed or replaced, the replacement barrier must be equally impervious and protective. Any replacement barrier will be subject to the same maintenance and inspection guidelines as outlined in this Plan unless indicated otherwise by the WDNR, or its successor.

A record of the repairs/maintenance actions will be kept with the inspection log and copy of the Plan, and will be made available to all interested parties (e.g., WDNR, on-site employees, contractors, future property owners).

In the event that necessary maintenance activities expose the underlying soil, the property owner will inform maintenance workers of any direct contact exposure hazard that might exist in a particular work area. The owner will also sample any soil that is

excavated from the site prior to off-site disposal to ascertain if contamination remains. The soil will be managed and disposed of by the property owner (or other responsible party) in accordance with applicable local, state, and federal law. Soils may be disposed of as “contaminated” in lieu of sampling if it is likely that characterization would indicate same.

FIGURE 1
CAP MAINTENANCE PLAN MAP



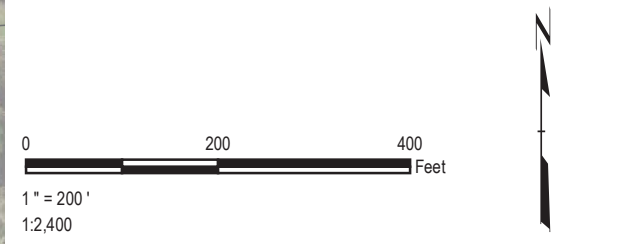
LEGEND

- SELECT PARCELS
- GROUNDWATER PVOC ES EXTENT
- GROUNDWATER CVOC ES EXTENT
- SUBSLAB VAPOR EXCEEDANCE EXTENT
- APPROXIMATE AREA OF SOIL RCL
- EXTENT OF ON-SITE CAP

ONSITE CAP TYPES

- EXISTING BUILDING CAP
- GRASS CAP
- GRAVEL/GRASS CAP
- PAVEMENT CAP
- MONITORING WELL LOCATION

- NOTES**
- AERIAL PHOTOGRAPHY SUPPLIED BY CALUMET COUNTY PLANNING, ZONING, & LAND INFORMATION DEPARTMENT PHOTOGRAPHY DATE: 2014.
 - GROUNDWATER ES EXTENTS ARE BASED ON OCTOBER 2015 DATA AND SHOW THE OUTER-MOST MAPPED EXTENT OF PCE, TCE, cis-1,2-DCE, OR VINYL CHLORIDE FOR CVOC, AND BENZENE FOR PVOC.



PROJECT:		FORMER TECUMSEH PRODUCTS COMPANY NEW HOLSTEIN, WISCONSIN	
TITLE:		CAP MAINTENANCE PLAN MAP	
DRAWN BY:	PAPEZ J	PROJ NO.:	213215
CHECKED BY:	SCHROEDER A	FIGURE D.2	
APPROVED BY:	STOLZENBURG T		
DATE:	MARCH 2017		
		708 Heartland Trail, Suite 3000 Madison, WI 53717 Phone: 608.826.3600 www.trcsolutions.com	
FILE NO.:			213215-025.mxd

**APPENDIX A
PROPERTY DEED**

Document Number

Quit Claim Deed
Title of Document



Register of Deeds
Calumet County, WI

Received for Record
Date: 6/28/07 14:10
Tr Fee: 4,200.00 Code:
Shirley Gregory

Recording Area

Name and Return Address
von Briesen & Roper, s c
411 E Wisconsin Avenue, Suite 700
Milwaukee, WI 53202

Parcel Identification Number (PIN)
261-0202-00L0100-000-0-172010-00-410A (Loc ID 18450),
261-0202-00L0200-000-0-172010-00-410A (Loc ID 18464),
261-0202-00L0100-000-0-172010-00-420A (Loc ID 18465),
261-0000-0000000-000-0-172010-15-450E (Loc ID 18568),
261-0202-00L0100-000-0-172010-00-440B (Loc ID 18569),
261-0003-030010A-000-0-172010-00-4400 (Loc ID 18919),
261-0003-030090A-000-0-172010-00-4400 (Loc ID 18920),
and
261-0003-050010A-000-0-172010-00-4400 (Loc ID 18921),

Drafted by
Curtis B Toll, Esquire
Greenberg Traurig, LLP
2700 Two Commerce Square
2001 Market Street
Philadelphia, PA 19103

QUIT CLAIM DEED

TECUMSEH POWER COMPANY, a Delaware corporation, Grantor

quit claims to HEUS ACQUISITIONS LLC, a Wisconsin limited liability company, Grantee

the following real estate located at 1604 Michigan Avenue, New Holstein, Calumet County, State of Wisconsin described on Exhibit A attached hereto and made a part hereof (the "Property")

TO HAVE AND TO HOLD subject to a restriction and covenant by Grantee on behalf of itself, its successors and its assigns that (a) the Property shall be used only for zoned and legally permitted commercial or industrial uses, and (b) this restriction and covenant shall (i) run with the land and shall be binding upon all current and future owners of the Property (or any portion thereof) and their successors and assigns, including any leasehold interest in the Property, and (ii) be included in all future deeds for conveyance of the Property, or any portion thereof

Return to

von Briesen & Roper, s c
411 E Wisconsin Avenue, Suite 700
Milwaukee, WI 53202
Attn Michael P Carlton, Esq

Parcel Identification Numbers
261-0202-00L0100-000-0-172010-00-410A (Loc ID 18450),
261-0202-00L0200-000-0-172010-00-410A (Loc ID 18464),
261-0202-00L0100-000-0-172010-00-420A (Loc ID 18465),
261-0000-0000000-000-0-172010-15-450E (Loc ID 18568),
261-0202-00L0100-000-0-172010-00-440B (Loc ID 18569),
261-0003-030010A-000-0-172010-00-4400 (Loc ID 18919),
261-0003-030090A-000-0-172010-00-4400 (Loc ID 18920), and
261-0003-050010A-000-0-172010-00-4400 (Loc ID 18921),

This is not homestead property

Dated this 15th day of June, 2007

GRANTOR
TECUMSEH POWER COMPANY, a Delaware corporation

By [Signature]
Name: Thomas W. [unclear]
Title: Corporate Director

ACKNOWLEDGEMENT

STATE OF WISCONSIN }
}ss
Lenawee County }

Personally came before me this 13 day of June, 2007 the above named

To me known to be the person(s) who executed the forgoing instrument and acknowledged the same

[Signature]
Notary Public, State of Wisconsin
My commission is permanent. (If not, state expiration date Nov 8, 2013)

THIS INSTRUMENT WAS DRAFTED BY

Curtis B Toll, Esquire
Greenberg Traurig, LLP
2700 Two Commerce Square
2001 Market Street
Philadelphia, PA 19103

Type or print name
(Signatures may be authenticated or acknowledged, Both are not necessary)
*Names of Persons signing in any capacity must be typed or printed below their signature.
10/06/2000

SANDI CHAPPELL
NOTARY PUBLIC - STATE OF MICHIGAN
COUNTY OF LENAWEE
My Commission Expires November 8, 2013

GRANTEE
HEUS ACQUISITIONS LLC, a Wisconsin limited liability company
By BEHR Enterprises, Inc., Managing Member

By [Signature]
Name: Edward E Jones
Title: President

ACKNOWLEDGEMENT

STATE OF WISCONSIN }
}ss
Calumet County }

Personally came before me this 22nd day of June, 2007 the above named Edward E Jones

To me known to be the person(s) who executed the forgoing instrument and acknowledged the same

[Signature]
T.J. Friederichs
Notary Public, State of Wisconsin
My commission is permanent. (If not, state expiration date November 9, 2008)

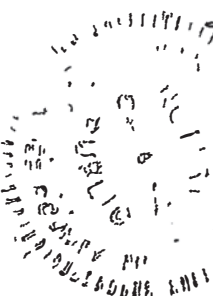


EXHIBIT A
LEGAL DESCRIPTION

Parcels "A" and "B", Certified Survey Map No. 202 filed in the Office of the Register of Deeds for Calumet County, Wisconsin on August 24, 1973, in Volume 2 on Page 86, as Document No 130116, being part of Outlot One of the Northeast $\frac{1}{4}$ of the Southeast $\frac{1}{4}$ of Section 10, Township 17 North, Range 20 East, City of New Holstein, Calumet County, Wisconsin.

ALSO

Lots Nine (9), Ten (10), Eleven (11), Twelve (12), Thirteen (13), Fourteen (14), Fifteen (15), Sixteen (16), Seventeen (17), Eighteen (18), Nineteen (19), Twenty (20), and Twenty-One (21), in Block Three (3), in A A Laun's Addition to the Village (now city) of New Holstein, Calumet County, Wisconsin

Also Lots One (1), Two (2), Three (3) and Four (4), in Block Four (4) in A A Laun's Addition to the Village (now city) of New Holstein, Calumet County, Wisconsin

Also all that part of vacated Adams Street lying between said Blocks 3 and 4 and all of the East-West Alley running through said Block 3, said parcels being also described, respectively, as Outlots 1 and 2 of the Southeast $\frac{1}{4}$ of the Southeast $\frac{1}{4}$ of said Section 10, according to the Assessor's Plat recorded in Volume 4 of Plats on page 20

ALSO

Lots One (1), Two (2), Three (3), Four (4), Five (5), Six (6), Seven (7), and Eight (8) of Block Three (3) of A A Laun's Addition to the City of New Holstein including the unused alley way lying West and South of such lots as designated as Outlot No (2) Two of said Block Three (3) on the Assessor's Replat for the City of New Holstein, Calumet County, Wisconsin

ALSO

Lots One (1), Two (2), Three (3) and Four (4) of Block Five (5) of A A Laun's Addition to the Village (now city) of New Holstein, Calumet County, Wisconsin

Outlots Two (2) and Three (3) of the Northeast $\frac{1}{4}$ - Southeast $\frac{1}{4}$ of Section 10, Township 17 North, Range 20 East and Outlot One (1) of the Northwest $\frac{1}{4}$ - Southeast $\frac{1}{4}$, Section 10, Township 17 North, Range 20 East, according to the Assessor's Plat recorded in Volume 4 of Plats on Page 20, City of New Holstein, Calumet County, Wisconsin

Less and excepting from Outlot One (1) that parcel of land conveyed to the City of New Holstein in Volume 135 of Records on Page 76

ALSO

Parts of the Northeast $\frac{1}{4}$ of the Southeast $\frac{1}{4}$ and the Southeast $\frac{1}{4}$ of the Southeast $\frac{1}{4}$, Section 10, Township 17 North, Range 20 East, City of New Holstein, Calumet County, Wisconsin, described as follows

Commencing at a point 50 feet North of the Northeast corner of Lot 1, Block 3 of A A. Laun's Addition, thence South 50 feet to said Northeast corner of Lot 1, Block 3, thence West along the South line of Roosevelt Avenue, 316 feet to the Northeast corner of Lot 1, Block 4 of the A A Laun's Addition, thence North 50 feet, thence East along the North line of Roosevelt Avenue to the point of beginning.

Parts of the Northeast $\frac{1}{4}$ of the Southeast $\frac{1}{4}$ and the Southeast $\frac{1}{4}$ of the Southeast $\frac{1}{4}$, Section 10, Township 17 North, Range 20 East, City of New Holstein, Calumet County, Wisconsin, described as follows

Commencing at a point 50 feet North of the Northeast corner of Lot 1, Block 4 of A A Laun's Addition, thence South 50 feet to said Northeast corner of Lot 1, Block 4, thence West along the South line of Roosevelt Avenue, 182 7 feet to the Northwest corner of said Lot 1, Block 4, thence Northwesterly to the Southwest corner of Outlot 2 of said Northeast $\frac{1}{4}$ - Southeast $\frac{1}{4}$, Section 10, said point also being the intersection of the North line of Roosevelt Avenue and the C M ST P & P. RR Easterly right-of-way line, thence East along said North line of Roosevelt Avenue to the point of beginning

ALSO

All lands being a part of the Southeast $\frac{1}{4}$ of the Southeast $\frac{1}{4}$ of Section 10, Township 17 North, Range 20 East, in the City of New Holstein, Calumet County, Wisconsin, and more particularly described as follows

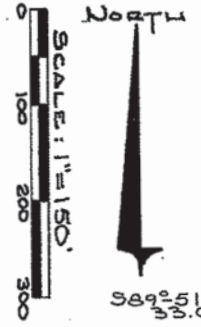
Tract 2 Commencing at the intersection of the centerline of Michigan Avenue and the centerline of former Chicago, Milwaukee, St Paul and Pacific Railroad main track, thence N62°37'06"E 49 51 feet along the centerline of Michigan Avenue, thence N28°57'51"W 30.01 feet to the point of beginning, thence continue N28°57'51"W 194 92 feet, thence N17°02'33"W 159 75 feet, thence S28°57'51"E 352 00 feet to the Northerly line of Michigan Avenue, thence S62°37'06"W 33 00 feet along said Northerly line to the point of beginning

Tract 3 Commencing at the intersection of the centerline of Michigan Avenue and the centerline of former Chicago, Milwaukee, St Paul and Pacific Railroad main track, thence N62°37'06"E 49 51 feet along the centerline of Michigan Avenue, thence S28°57'51"E 30 01 feet to the Southerly line of Michigan Avenue and the point of beginning, thence N62°37'06"E 29 08 feet along said Southerly line, thence N89°40'20"E 4 48 feet along said Southerly line, thence S28°57'51"E 310 26 feet, thence S61°02'09"W 33 00 feet, thence N28°57'51"W 313 21 feet to the Southerly line of Michigan Avenue and the point of beginning

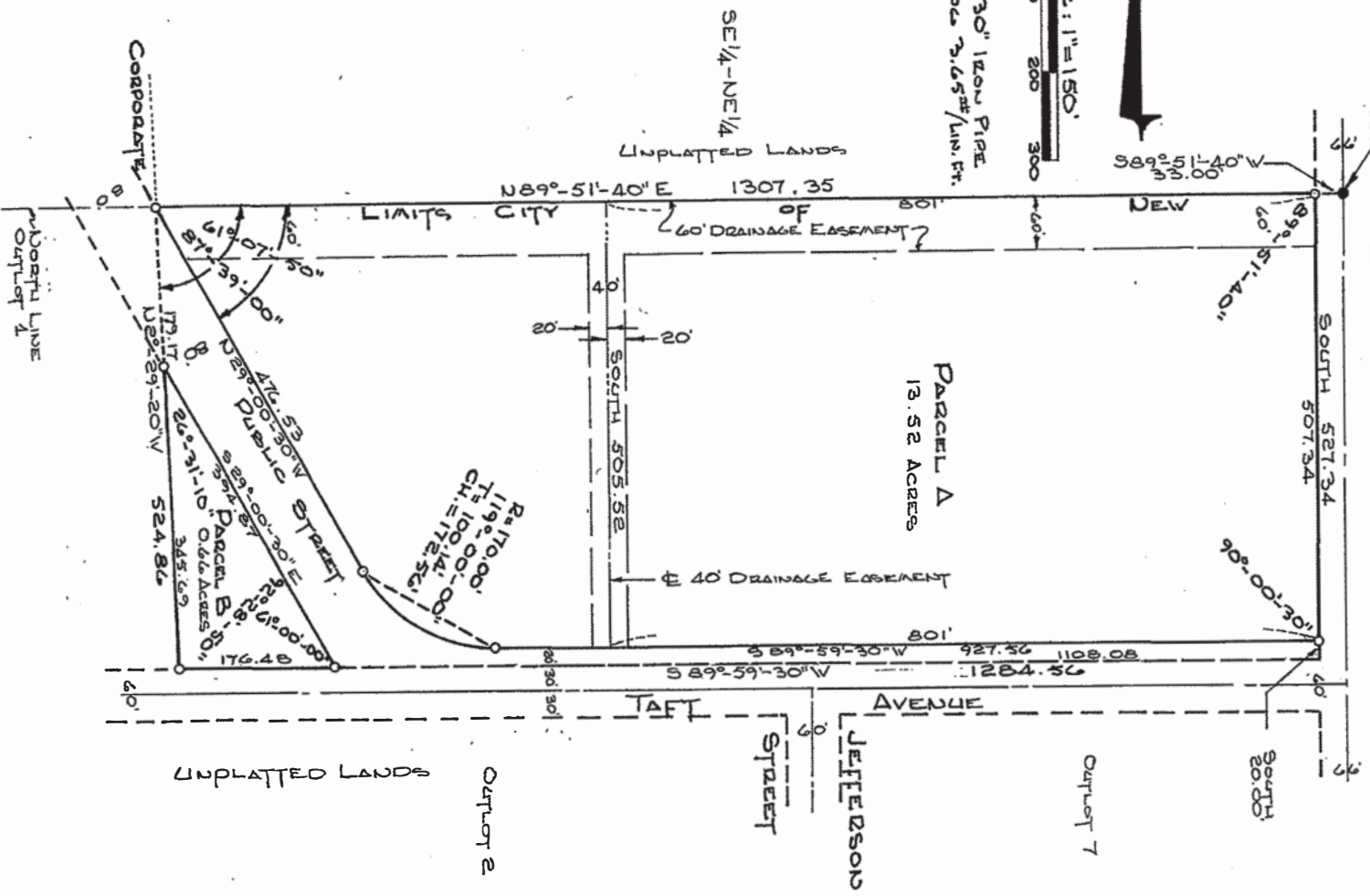
PART OF OUTLOT 1, NE 1/4-SE 1/4, SECTION 10, T17N, R20E,
CITY OF NEW HOLSTEIN, CALUMET Co., WISC.

EAST 1/4 CORNER,
SEC 10, T17N, R20E

NW 1/4-SW 1/4, SEC 11, T17N, R20E
UNPLATTED LANDS
MASON STREET



0 = 2" X 30" IRON PIPE
VERTICALLY 3.65# / LIN. FT.



APPENDIX B
INSPECTION CHECKLIST, LOGS, AND PHOTOGRAPHS

Directions: In accordance with s. NR 727.05 (1) (b) 3., Wis. Adm. Code, use of this form for documenting the inspections and maintenance of certain continuing obligations is required. Personal information collected will be used for administrative purposes and may be provided to requesters to the extent required by Wisconsin's Open Records law [ss. 19.31-19.39, Wis. Stats.]. When using this form, identify the condition that is being inspected. See the closure approval letter for this site for requirements regarding the submittal of this form to the Department of Natural Resources. A copy of this inspection log is required to be maintained either on the property, or at a location specified in the closure approval letter. Do NOT delete previous inspection results. This form was developed to provide a continuous history of site inspection results. The Department of Natural Resources project manager is identified in the closure letter. The project manager may also be identified from the database, BRRTS on the Web, at <http://dnr.wi.gov/botw/SetUpBasicSearchForm.do>, by searching for the site using the BRRTS ID number, and then looking in the "Who" section.

Activity (Site) Name Tecumseh Products Co Inc - West	BRRTS No. 02-08-100332
--	----------------------------------

Inspections are required to be conducted (see closure approval letter):

- annually
- semi-annually
- other – specify _____

When submittal of this form is required, submit the form electronically to the DNR project manager. An electronic version of this filled out form, or a scanned version may be sent to the following email address (see closure approval letter):

kevin.mcknight@wisconsin.gov

Inspection Date	Inspector Name	Item	Describe the condition of the item that is being inspected	Recommendations for repair or maintenance	Previous recommendations implemented?	Photographs taken and attached?
		<input type="checkbox"/> monitoring well <input checked="" type="checkbox"/> cover/barrier <input type="checkbox"/> vapor mitigation system <input type="checkbox"/> other:			<input type="radio"/> Y <input type="radio"/> N	<input type="radio"/> Y <input type="radio"/> N
		<input type="checkbox"/> monitoring well <input checked="" type="checkbox"/> cover/barrier <input type="checkbox"/> vapor mitigation system <input type="checkbox"/> other:			<input type="radio"/> Y <input type="radio"/> N	<input type="radio"/> Y <input type="radio"/> N
		<input type="checkbox"/> monitoring well <input checked="" type="checkbox"/> cover/barrier <input type="checkbox"/> vapor mitigation system <input type="checkbox"/> other:			<input type="radio"/> Y <input type="radio"/> N	<input type="radio"/> Y <input type="radio"/> N
		<input type="checkbox"/> monitoring well <input checked="" type="checkbox"/> cover/barrier <input type="checkbox"/> vapor mitigation system <input type="checkbox"/> other:			<input type="radio"/> Y <input type="radio"/> N	<input type="radio"/> Y <input type="radio"/> N
		<input type="checkbox"/> monitoring well <input checked="" type="checkbox"/> cover/barrier <input type="checkbox"/> vapor mitigation system <input type="checkbox"/> other:			<input type="radio"/> Y <input type="radio"/> N	<input type="radio"/> Y <input type="radio"/> N
		<input type="checkbox"/> monitoring well <input checked="" type="checkbox"/> cover/barrier <input type="checkbox"/> vapor mitigation system <input type="checkbox"/> other:			<input type="radio"/> Y <input type="radio"/> N	<input type="radio"/> Y <input type="radio"/> N

{Click to Add/Edit Image}

Date added: 03/15/2016



Title: Initial Cap - Interior

{Click to Add/Edit Image}

Date added: 03/15/2016



Title: Initial Cap - Exterior

{Click to Add/Edit Image}

Date added: 03/15/2016



Title: Initial Cap - Exterior

{Click to Add/Edit Image}

Date added: 03/15/2016



Title: Initial Cap - Exterior