State of Wisconsin
Department of Natural Resources
P.O. Box 7921, Madison, WI 53707-7921

GIS REGISTRY (Cover Sheet)
Form 4400-280 (R 6/13)

Source Property Information

CLOSURE DATE: 01/17/2014

BRRTS #: 02-67-560533

FID #: 267008940

ACTIVITY NAME: Steel Craft Corp Addition

DATCP #:

PROPERTY ADDRESS: 105 Steel Craft Dr

PECFA#:

MUNICIPALITY: Hartford

PARCEL ID #: 36 21-02-004006

***WTM COORDINATES:**

X: **652455** Y: **317471**

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

WTM COORDINATES REPRESENT:

○ Approximate Center Of Contaminant Source

◉ Approximate Source Parcel Center

Please check as appropriate: (BRRTS Action Code)

CONTINUING OBLIGATIONS

Contaminated Media for Residual Contamination:

☐ Groundwater Contamination > ES *(236)*

- ☐ Contamination in ROW
- ☐ Off-Source Contamination

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

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

- ☐ Contamination in ROW
- ☐ Off-Source Contamination

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

Site Specific Obligations:

☐ Soil: maintain industrial zoning *(220)*

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

☐ Structural Impediment *(224)*

☐ Site Specific Condition *(228)*

☒ Cover or Barrier *(222)*

- ☒ Direct Contact
- ☐ Soil to GW Pathway

☐ Vapor Mitigation *(226)*

☐ Maintain Liability Exemption *(230)*

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

Monitoring Wells:

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

○ Yes ○ No ◉ N/A

** Residual Contaminant Level*
***Site Specific Residual Contaminant Level*

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

Scott Walker, Governor
Cathy Stepp, Secretary
Telephone 608-266-2621
Toll Free 1-888-936-7463
TTY Access via relay - 711

January 17, 2014

Gary Wendorff
Hartford Investment Company LLC
105 Steel Craft Drive
Hartford, WI 53027

KEEP THIS DOCUMENT WITH YOUR PROPERTY RECORDS

SUBJECT: Final Case Closure with Continuing Obligations
Steel Craft Corp Addition, 105 Steel Craft Drive, Hartford
DNR BRRTS Activity #0267560533
FID #267008940

Dear Mr. Wendorf:

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

This final closure decision is based on the correspondence and data provided, and is issued under chs. NR 726 and 727, Wis. Adm. Code. The Southeast Region Closure Committee reviewed the request for closure on August 1, 2013. This Closure Committee reviews environmental remediation cases for compliance with state laws and standards to maintain consistency in the closure of these cases. I sent you a closure denial letter on August 8, 2013, and you provided documentation that the conditions in that letter were met in several subsequent submittals in October, and December 2013, and January 2014.

Contamination was discovered at Steel Craft from a Phase II that was done prior to a planned building expansion at this industrial facility. PAHs were detected in soil above residential direct-contact standard. Lead levels were found in soil above the residential and industrial direct-contact standards. Groundwater was discovered to have concentrations above the Preventive Action Limits, but below the Enforcement Standards for Poly aromatic hydrocarbons (PAHs), lead, cadmium and arsenic. Since that time, the building addition has been constructed, and serves the dual purpose of capping the soil contamination which is the employed method of remedial action at this site, which will remain in industrial use at this time.

Continuing Obligations

The conditions of closure and continuing obligations required were based on the property being used for industrial purposes. The continuing obligations for this site are summarized below. Further details on actions required are found in the section Closure Conditions.

- Residual soil contamination exists that must be properly managed should it be excavated or removed.

- Pavement, an engineered cover and a landscaped soil cover must be maintained over contaminated soil and the DNR must approve any changes to this barrier.

The attached 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 also 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 Southeast Regional DNR office, at 1155 Pilgrim Road, in Plymouth. This letter and information that was submitted with your closure request application, including your maintenance plan and map, and 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, building foundation, soil and landscape cover is required, as shown on the attached map, Cap Location Map, January 6, 2014, 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;
- 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, a day care, senior center, hospital, or similar residential exposure setting.

Closure Conditions

Compliance with the requirements of this letter is a responsibility to which you, and any subsequent property owners must adhere. DNR staff will conduct periodic prearranged inspections to ensure that the conditions included in this letter 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.

January 17, 2014, BRRTS #0267560533, FID#267008940

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

Department of Natural Resources
Attn: Remediation and Redevelopment Program Environmental Program Associate
Victoria Stovall
PO Box 12436
Milwaukee, WI 53212

Residual Soil Contamination (ch. NR 718, chs. 500 to 536, Wis. Adm. Code or ch. 289, Wis. Stats.)
Soil contamination remains at various locations as indicated on the attached map, Figure B.2.a Pre-Remedial Soil Contamination Map, May 15, 2013. If soil in the specific locations described above is excavated in the future, the property owner or right-of-way holder at the time of excavation must sample and analyze the excavated soil to determine if contamination remains. If sampling confirms that contamination is present, the property owner or right-of-way holder at the time of excavation will need to determine whether the material is considered solid or hazardous waste and ensure that any storage, treatment or disposal is in compliance with applicable standards and rules. Contaminated soil may be managed in accordance with ch. NR 718, Wis. Adm. Code, with prior DNR approval.

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

Cover or Barrier (s. 292.12 (2) (a), Wis. Stats., s. NR 726.15, s. NR 727.07 Wis. Adm. Code)
The pavement, building foundation and soil/landscaped cover that exists in the location shown on the **attached map, Figure 4, Cap Location Map** shall be maintained in compliance with **the attached maintenance plan** in order to prevent direct contact with residual soil contamination that might otherwise pose a threat to human health.

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 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. 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.

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

Chapter NR 140, Wis. Adm. Code Exemption

Recent groundwater monitoring data at this site indicates that for benzo(a)pyrene, benzo(b)flouranthene, and chrysene at MW-9, MW-10, TW-13, and TW-15 contaminant levels exceed the NR 140 preventive action limit

(PAL) but are below the enforcement standard (ES). Also, recent groundwater monitoring data at this site indicates that for arsenic at TW-10, TW-13, and TW-15; for cadmium at TW-12; for lead at TW-11 and TW-13 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 because of the response actions that you have taken. Therefore, pursuant to s. NR 140.28, Wis. Adm. Code, an exemption to the PAL is granted for the above compounds at the above locations. Please keep this letter, because it serves as your exemption.

In Closing

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

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

The DNR appreciates your efforts to restore the environment at this site. If you have any questions regarding this closure decision or anything outlined in this letter, please contact John Feeney at 920-893-8523, or at johnm.feeney@wisconsin.gov.

Sincerely,

Pam Mylotta
Southeast Region Team Supervisor
Bureau for Remediation & Redevelopment
Attachments:

- Groundwater Isoconcentration Map, Figure B.3.b, May 2013
- Soil Contamination Map, Figure 3, May 15, 2013
- Cap Location Map, Figure 4, January 6, 2014
- Soil/Pavement Cover and Building Barrier Maintenance Plan, December 5, 2013
- Continuing Obligations for Environmental Protection, RR-819

cc: PSI
Bill Phelps, DG/5

State of Wisconsin
Department of Natural Resources
PO Box 7921, Madison WI 53707-7921
dnr.wi.gov

Case Closure - GIS Registry

SUBMIT AS UNBOUND PACKAGE IN THE ORDER SHOWN

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

Site Information

BRRTS No.	Parcel ID No.		
02-67-560533	21-02-004006		
BRRTS Activity (Site) Name	WTM Coordinates		
	X	Y	
Steel Craft Corporation Addition	652455	317471	
Street Address	City	State	ZIP Code
105 Steel Craft Drive	Hartford	WI	53027

Responsible Party (RP) Name			
Gary Wendorff			
Company Name			
Hartford Investment Company, LLC			
Street Address	City	State	ZIP Code
105 Steel Craft Drive	Hartford	WI	53027
Phone Number	Email		
(262) 673-6770			

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

Environmental Consultant Name			
Erika Dahlem			
Consulting Firm			
Professional Service Industries, Inc. (PSI)			
Street Address	City	State	ZIP Code
W237 N2878 Woodgate Road, Suite 2	Pewaukee	WI	53072
Phone Number	Email		
(262) 347-0898	erika.dahlem@psiusa.com		
Acres Ready For Use	Voluntary Party Liability Exemption Site? ○ Yes ◉ No		
20.24			

Fees and Mailing of Closure Request

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

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

   ☒ $750 Closure Fee

   ☒ $200 GIS Registry Fee for Soil

   ☐ $250 GIS Registry Fee for Groundwater Lost Well(s)

   Total Amount of Payment $ $950.00

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

Site Summary

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

1. General Site Information and Site History

A. **Site Location**: Describe the physical location of the site, both generally and specific to its immediate surroundings.
The project site is located at 105 Steel Craft Drive in Hartford, Wisconsin. The subject property is fronted to the north by an existing railroad, east by Wilson Road, south by Ewing Avenue and an outlet for a millpond, and west by a developed commercial/industrial property. The site for the new addition is currently a grass landscaped area surrounded by existing asphalt drives. A majority of the area is relatively flat with the exception of the southern half of the new addition area where it slopes downward approximately 6 feet in elevation. Current surface elevations within the building pad area vary from 986 feet to 992. The site Latitude and Longitude is 43.31859°N and 88.36700°W, respectively.

B. **Prior and current site usage**: Specifically describe the current and historic occupancy and types of use.
Steel Craft began its operations in 1976. The Company started with a 2,000 square foot building. Seven expansions and three buildings later, Steel Craft currently occupies an approximately 365,000 square foot modern manufacturing facility situated on 28 acres in Hartford, Wisconsin.

C. Describe how and when site contamination was discovered.
Site contamination was discovered in March 2013 during PSI's Phase II Environmental Site Assessment (ESA) and subsequently in PSI's April 2013 Supplemental Phase II ESA.

D. Describe the type(s) and source(s) or suspected source(s) of contamination.
In general, petroleum and metals contamination was discovered in the Subject Property's soil during PSI's Phase II and Supplemental Phase II ESAs. PSI concluded that the source for the contamination is not known; however, it is suspected that the petroleum and/or metals contaminants discovered at shallow depths on the Subject Property are often found in fill material. Thus, the fill material on these properties and/or de minimis spills from past operation on-site are likely sources for the contaminants found in these shallow soils.

E. Other relevant site description information (or enter Not Applicable).
Steel Craft, Inc. wishes to expand its current operations with an additional site building. The project includes construction of a new addition to the east wall of the original building located at Steel Craft, Inc. in Hartford, Wisconsin. According to construction plans, the new building addition measures approximately 100,183 square feet. The new addition extends off of the east wall of the original building. PSI understands that the new building is a single-story slab-on-grade structure with no below grade levels. Additional site work included the construction of new pavements for a light duty parking lot to the east of the new building additional as well as new heavy duty truck pavements near the northeast corner of the new addition and a rehabilitation of an existing truck driveway connecting Wilson Avenue to the northeast corner of the existing building. Based on the preliminary grading plan, final grades for the pavement are at or near existing grades. Additional site work also included the construction of a new storm-water pond near the northeast corner of the Subject Property. The site for the new addition was previously a grass landscaped area surrounded by asphalt drives.

F. List BRRTS activity site name and number for all other BRRTS activities at this property, including closed cases.
FORCE OUTBOARDS (02-67-000342), MERCURY MARINE SEWER LN/ METAL SHAV AREA (02-67-184670), MERCURY MARINE FRMR PROD TEST CELL AREA (02-67-184691), MERCURY MARINE CHIPPER TANK AREA (02-67-184700), MERCURY MARINE INTERIOR TANK AREA (03-67-184748), MERCURY MARINE HEATING OIL TANK AREA (03-67-184742), MERCURY MARINE GUARD HOUSE AREA (03-67-184682), MERCURY MARINE N GAS TANK AREA (03-67-184708), MERCURY MARINE NAPTHA TANK AREA (03-67-184716), MERCURY MARINE KEROSENE TANK AREA (03-67-184734), MERCURY MARINE STONE SUMP AREA (02-67-184755), MERCURY MARINE W TEST PIT AREA (02-67-184727)

G. List BRRTS activity/site name(s) and number(s) for all properties immediately adjacent to this site, and those impacted by contamination from this site.
HARTFORD MEDICAL CLINIC (03-67-002963)

H. **Current zoning** (e.g. industrial, commercial, residential) for the site and for neighboring properties, and how verified (Provide documentation in Attachment G).
M-3 General Industrial according to ALTA/ACSM Land Title Survey and City of Hartford records

2. General Site Conditions

A. Soil/Geology

i. Describe soil type(s) and relevant physical properties, thickness of soil column across the site, vertical and lateral variations in soil types.
Underlying the surface soils at the subject property are deposits of the Horicon Formation, which Includes till, and associated sand and gravel, and other stratified deposits. The till is generally

brown (7.5YR hue) or, less commonly, reddish brown (5YR hue) and sandy. Till of the Horicon Formation was deposited by ice of the Green Bay Lobe during Late Wisconsinan time, between approximately 13,000 and 18,000 years ago.

The description of the site-specific subsurface conditions provided herein was derived from onsite observations of soil samples collected only from the locations where borings were installed on March 11, 2013 and April 25, 2013. Representative soil samples were obtained from the soil borings and were visually classified using the Unified Soil Classification System (USCS) as a guideline. At a majority of the boring locations completed in non-paved areas, a surficial layer of topsoil was observed varying in thickness from 4 to 6 inches. At the boring locations completed within the existing paved areas, asphalt thickness was observed to vary from 5 to 8 inches while underlying base course thickness was observed to vary from 4 to 6 inches. Beneath topsoil or pavement materials, fill material was observed. The fill material generally consisted of 2 to 7.5 feet of brown-gray silty clay, sandy clay, clayey sand, silty sand, sand and pebbles with minor amounts of gravel, concrete rubble, organics, slag, glass, wood fragments and/or brick fragments.. Beneath the fill material, the site soils consisted of native olive-dark/light gray-brown silty clay with minor amounts of organics, dark brown-dark aqua blue silty sandy clay and tan sandy silt, dark/light gray-black-brown-greenish bluish gray silty clay with minor amounts of organics and bivalve shells, tan sand, tan-dark brown-dark aqua blue sandy silt, dark/light gray clayey silt and brown gravelly sand. Bedrock was not encountered in any of the borings to the maximum depth explored (16 feet bgs).

The above subsurface descriptions are generalized in nature to highlight the major subsurface stratification features and material characteristics. The boring logs should be reviewed for specific information at individual boring locations. These records include soil descriptions, stratifications, recovery percentage, PID readings and water levels. The stratifications shown on the boring logs represent the conditions only at the actual boring locations. Variations may occur and should be expected between boring locations. The stratifications represent the approximate boundary between subsurface materials and the actual transition may be gradual.

ii. Describe the composition, location and lateral extent, and depth of fill or waste deposits on the site.
Beneath topsoil or pavement materials, fill material was observed sitewide. The fill material generally consisted of 2 to 7.5 feet of brown-gray silty clay, sandy clay, clayey sand, silty sand, sand and pebbles with minor amounts of gravel, concrete rubble, organics, slag, glass, wood fragments and/or brick fragments.

iii. Depth to bedrock, bedrock type, and whether or not it was encountered during the investigation.
According to the Southeastern Wisconsin Regional Planning Commission (SEWRPC) Technical Report No. 37 (2002), the unconsolidated sediments in the area are approximately 50-100-feet thick and are bounded below by Silurian bedrock, consisting primarily of dolomite. Bedrock was not encountered in any of the borings to the maximum depth explored (16 feet bgs).

iv. Describe the nature and locations of current surface cover(s) across the site (e.g. natural vegetation, landscaped areas, gravel, hard surfaces, and buildings).
Steel Craft currently occupies a 365,000 square foot modern manufacturing facility situated on 28 acres in Hartford, Wisconsin. The facility's approximately 100,000-square foot addition, as well as associated paving and landscaping, was completed in November 2013.

B. Groundwater

i. **Discuss depth to groundwater and piezometric elevations**. Describe and explain depth variations, and whether free product affects measurement or water table elevation. Describe the stratigraphic unit(s) where water table was found or which were measured for piezometric levels.
Groundwater was observed during the site investigations at depths between 2 to 5-feet bgs across the site. Based on the presence of near surface clay soils across the site, it is likely that the clay soils are preventing the water levels from reaching their piezometric elevation. Due to the presence of low permeability clay soils, it is required to install permanent groundwater monitoring wells in order to accurately measure the long term groundwater level for this site.

ii. Discuss groundwater flow direction(s), shallow and deep. Describe and explain flow variations, including fracture flow if present.
Based on our interpretation of the physical setting sources and past data, PSI infers that the shallowest groundwater:

- Occurs at 2-5-feet below ground surface;
- Exists under unconfined conditions;
- Locally flows in a southerly direction towards the Rubicon River; and
- Regionally flows in a southwesterly direction towards the Rock River.

Actual groundwater flow may be locally influenced by seasonal rainfall, proximity to surface bodies of water (lakes, rivers, canals), surface topography, underground structures, soil and bedrock geology, production wells and other factors beyond the scope of this study.

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

Groundwater information was gathered from temporary groundwater monitoring wells; thus, hydraulic conductivity, flow rate and permeability were not obtained.

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

Wisconsin Unique Well BH248 is a municipal well most likely located within 1200 feet of the site. It is located northwest and upgradient of the Subject Property.

3. Site Investigation Summary

A. General

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

PSI completed a Geotechnical Engineering Services Report for the proposed new structure on February 27, 2013 (PSI Report No. 0052662R1). The purpose of that study was to explore the subsurface conditions at the site and develop geotechnical design criteria regarding foundations, floor slabs and pavements for the proposed project. As indicated in that report, existing undocumented fill material was encountered within the borings performed within the new building area that extended to a depth of approximately 3± to 8± feet below existing ground surface.

According to the Wisconsin Department of Natural Resources (WDNR) Bureau for Remediation and Redevelopment Tracking System (BRRTS) on-line database, the property at 105 Steel Craft Drive in Hartford, Wisconsin has six closed Environmental Repair Program (ERP) sites and six closed Leaking Underground Storage Tank (LUST) sites. The purpose of the PSI's site investigation activities (Phase II ESA and Supplemental Phase II ESA) was to assess undocumented fill material identified in PSI's Geotechnical Engineering Services Report and to further assess the presence or absence of contaminants in shallow soil and/or groundwater at the site related to the historical ERP/LUST sites at the Subject Property.

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

Not Applicable- contamination does not extend beyond the source property boundaries

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

Not Applicable- no structural impediments to the completion of site investigation were encountered

B. Soil

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

The soil contamination appears to be delineated and does not lie within any utility corridor.

ii. Describe the level and types of **soil contaminants** found in the upper four feet of the soil column.

At this time, the source for the petroleum and metals contamination is not known; however, the petroleum and metal contaminants that were discovered at shallow depths on the Subject Property are often found in fill material. Thus, the fill material and/or de minimis spills from past operations on-site are likely the sources for the contaminants found in these shallow soils. Based on the analytical results, shallow soils (1-5-feet below ground surface and within the fill material) in the areas of redevelopment are impacted by petroleum and/or metals constituents at concentrations exceeding WDNR RCLs.

iii. Identify the ch. NR 720, Wis. Adm. Code, method used to establish the soil cleanup standards for this site: for example, a Residual Contaminant Level (RCL) , a Site-Specific Residual Contaminant Level (SSRCL), or a Performance Standard as determined under ss NR 720.09, 720.11 and 720.19, Wis. Adm. Code. Identify the land use classification that was used to establish cleanup standards. Provide a copy of the supporting calculations/information in Attachment C.

Generic NR 720 RCLs and Suggested PAH Generic Soil Cleanup Levels were used to establish cleanup standards.

C. Groundwater

i. Describe degree and extent of groundwater contamination at or from this site. Relate this to known or suspected sources and known or potential receptors/migration pathways. Specifically address any potential or existing impacts to water supply wells or interception with building foundation drain systems.

PAH constituents' benzo(a)pyrene, benzo(b)fluoranthene and chrysene were detected only in groundwater sample TW-15 at concentrations above their respective NR 140 PALs. There were no groundwater sample concentrations that exceeded the NR 140 ES. Thus, the groundwater contamination that is above the PAL is limited to TW-15, is

delineated and does not occur sitewide.

ii. Describe the presence of free product at the site, including the thickness, depth, and locations.
Not Applicable- no free product encountered at the site

D. Vapor

i. Describe how the vapor migration pathway was assessed, including locations where vapor or indoor air samples were collected. If the vapor pathway was not assessed, explain reasons why.
Gross contamination such as free-phase petroleum product or significant volatile vapor readings were not observed in any of PSI's soil samples or temporary groundwater monitoring wells. PAHs are the petroleum contaminants of concern remaining at the Subject Property as far as vapor intrusion concerns. PAHs fix to soil particles and are unlikely to migrate as vapors within a utility corridor or into the remaining/proposed building foundations. Additionally, low permeability clay makes up the soils underlying the Subject Property and should mitigate any potential vapor intrusion under any buildings on the Subject Property. Also, the soil and groundwater contamination appears to be delineated and does not lie within any utility corridor. Thus, vapor intrusion should not be of concern at the Subject Property.

ii. Identify the applicable DNR action levels and the land use classification used to establish them. Describe where the DNR action levels were reached or exceeded (e.g., sub slab, indoor air or both).
Not Applicable- vapor concerns were not assessed during PSI's investigations for the reasons outlined above.

E. Surface Water and Sediment

i. Identify whether surface water and/or sediment was assessed and describe the impacts found. If this pathway was not assessed, explain why.
Not Applicable- surface water and/or sediment was not encountered at the property

ii. Identify any surface water and/or sediment action levels used to assess the impacts for this pathway and how these were derived. Describe where the DNR action levels were reached or exceeded.
Not Applicable- surface water and/or sediment was not encountered at the property

4. Remedial Actions Implemented and Residual Levels at Closure

A. General: Provide a brief summary of the remedial action history. List previous remedial action report submittals by name and date. Identify remedial actions undertaken since the last submittal for this project and provide the appropriate documentation in Attachment C.
Not Applicable- remedial actions were not performed on the property

B. Describe any immediate or interim actions taken at the site under ch NR 708, Wis. Adm. Code.
Not Applicable- remedial actions were not performed on the property

C. Describe the *active* remedial actions taken at the site, including: type of remedial system(s) used for each media impacted; the size and location of any excavation or in-situ treatment; the effectiveness of the systems to address the contaminated media and substances; operational history of the systems; and summarize the performance of the active remedial actions. Provide any system performance documentation in Attachment A.7.
Not Applicable- remedial actions were not performed on the property

D. Provide a discussion of the nature, degree and extent of residual contamination that will remain at the site or on off-site affected properties after case closure.
Residual soil contamination is present at the site within the upper 5-feet of ground surface beneath the new addition, new pavements and new grass landscaped area. The site will be placed on WDNR's GIS Registry of Closed Remediation Sites for the residual soil contamination.

E. Describe the remaining soil contamination within four feet of ground surface (direct contact zone) that attains or exceeds the ch. NR720, Wis. Adm. Code, standard(s) for direct contact.
There is soil contamination that remains at the Subject Property within 4-feet of the ground surface. However, the building addition and paved surface areas over the remaining residual soil contamination will serve as a barrier to prevent direct human contact with residual soil contamination that might otherwise pose a threat to human health; thus minimizing any current or future concerns for direct contact. A Soil/Pavement Cover and Building Barrier Maintenance Plan has been prepared per the requirements of NR 724.13(2) of the WAC.

F. Describe the remaining soil contamination in the vadose zone that attains or exceeds the soil standard(s) for the groundwater pathway.
Phenanthrene in soil sample SP-6 from 1-3-feet below ground surface is the only remaining soil contamination in the vadose zone that attains or exceeds the soil standard(s) for the groundwater pathway. Groundwater was not observed in this soil boring.

G. Describe how the residual contamination will be addressed, including but not limited to details concerning: covers, engineering controls or other barrier features; use of natural attenuation of groundwater; and vapor mitigation systems or measures.

PSI has prepared a Soil/Pavement Cover and Building Barrier Maintenance Plan for the Subject Property in accordance with the requirements of s. NR 724.13(2), WAC. The 100,183 square foot new building addition and paved/landscaped surfaces will serve as a barrier to prevent direct human contact with residual soil contamination on the Subject Property that might otherwise pose a threat to human health. The new building and paved/landscaped surfaces also act as partial infiltration barriers to minimize future soil-to-groundwater contamination migration that would violate the groundwater standards in Ch. NR 140, WAC. Based on the current and future use of the Subject Property, these barriers should function as intended unless disturbed.

H. If using natural attenuation as a groundwater remedy, describe how the data collected supports the conclusion that natural attenuation is effective in reducing contaminant mass and concentration, (e.g. stable or receding groundwater plume).

Not Applicable- ES exceedances were not identified onsite

I. Identify how all exposure pathways were removed and/or adequately addressed by immediate and/or remedial action(s) described above in paragraphs, B, C, D, E and F.

The exposure pathways are/will be addressed through the implementation of the Soil/Pavement Cover and Building Barrier Maintenance Plan.

J. Identify any system hardware anticipated to be left in place after site closure, and explain the reasons why it will remain.

Not Applicable- no hardware will be left in place after site closure.

K. Identify the need for a ch. NR 140, Wis. Adm. Code, groundwater Preventive Action Limit (PAL) or Enforcement Standard (ES) exemption, and identify the affected monitoring points and applicable substances.

PAH constituents' benzo(a)pyrene, benzo(b)fluoranthene and chrysene were detected in groundwater sample TW-15 at concentrations above their respective NR 140 PALs. There were no groundwater sample concentrations that exceeded the NR 140 ES. Thus, it is PSI's opinion that PAL Exemption under NR 140.28(2) is warranted at this time.

L. If a DNR action level for vapor intrusion was exceeded (for indoor air, sub slab, or both) describe where it was exceeded and how the pathway was addressed.

Not Applicable- vapor intrusion was not investigated during this site assessment activities.

M. Describe the surface water and/or sediment contaminant concentrations and areas after remediation. If a DNR action level was exceeded, describe where it was exceeded and how the pathway was addressed.

Not Applicable- no surface water and/or sediment contamination concerns exist on the property.

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

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

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

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

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

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

7. Underground Storage Tanks

A. Were any tanks, piping or other associated tank system components removed as part of the investigation or remedial action? ○ Yes ◉ No

B. Do any upgraded tanks meeting the requirements of ch. SPS 310, Wis. Adm. Code, exist on the property? ○ Yes ◉ No

C. If the answer to question 7b is yes, is the leak detection system currently being monitored? ○ Yes ○ No

Data Tables (Attachment A)

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

General directions for Data Tables:

- Use bold and italics font on information of importance on tables and figures. Use **bold font** for ch. NR 140, Wis. Adm. Code, groundwater enforcement standard (ES) attainments or exceedances, and *italicized font* for ch. NR 140, Wis. Adm. Code, groundwater preventive action limit (PAL) standard attainments or exceedances.
- Do not use shading or highlighting on the analytical tables.
- Include on Data Tables the level of detection for results which are below the detection level (i.e. do not just list as no detect (ND)).
- Include the units on data tables.
- Summaries of all data must include information collected by previous consultants.
- Do not submit lab data sheets unless these have not been submitted in a previous report. Tabulate all data required in s. NR 716.15 (2)(g)3, Wis. Adm. Code, in the format required in s. NR 716.15(2)(h)3, Wis. Adm. Code.
- Include in Attachment A all of the following tables, in the order prescribed below, with the specific Closure Form titles noted on the separate attachments (e.g., Title: A.1. Groundwater Analytical Table; A.2. Pre-remedial Soil Analytical Table, etc).
- For required documents, each table (e.g., A.1., A.2., etc.,) should be a separate PDF.

A. Data Tables

A.1. **Groundwater Analytical Table(s):** Table(s) showing the analytical results and collection dates, for all groundwater sampling points e.g. monitoring wells, temporary wells, sumps, extraction wells, any potable wells and any other wells, extraction wells and any potable wells for which samples have been collected.

A.2. **Pre-remedial Soil Analytical Table(s):** Table(s) showing the soil analytical results and collection dates - prior to conducting the interim and/or remedial action. Indicate if sample was collected above or below the all-time low water table (unsaturated verses saturated).

A.3. **Post-remedial Soil Analytical Table(s):** Table(s) showing the post-remedial action soil analytical results and collection dates. Indicate if sample was collected above or below the all-time low water table (unsaturated verses saturated).

A.4. **Pre and Post Remaining Soil Contamination Soil Analytical Table(s):** Table(s) showing only the pre and post remedial action soil analytical results that exceed a Residual Contaminate Level (RCL) or a Site-Specific Residual Level (SSRCL).

A.5. **Vapor Analytical Table**: Table(s) showing type(s) of samples, sample collection methods, analytical method, sample

results, date of sample collection, time period for sample collection, method and results of leak detection, and date, method and results of communication testing.

A.6. **Other Media of Concern (e.g., sediment or surface water**): Table(s) showing type(s) of sample, sample collection method, analytical method, sample results, date of sample collection, time period for sample collection, method and results sampling.

A.7. **Water Level Elevations:** Table(s) showing all water level elevation measurements and dates from all monitoring wells. If present, free product should be noted on the table.

A.8. **Other:** This attachment should include: 1) any available tabulated natural attenuation data; 2) data tables pertaining to engineered remedial systems that document operational history, demonstrate system performance and effectiveness, and display emissions data; and (3) any other data tables relevant to case closure not otherwise noted above. If this section is not applicable, please explain the reasons why.

Maps and Figures (Attachment B)

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

General Directions for all Maps and Figures:

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

B.1. Location Maps

B.1.a. **Location Map:** A map outlining all properties within the contaminated site boundaries on a U.S.G.S. topographic map or plat map in sufficient detail to permit easy location of all impacted and/or adjacent parcels. If groundwater standards are exceeded, include the location of all potable wells, including municipal wells, within 1200 feet of the area of contamination.

B.1.b. **Detailed Site Map:** A map that shows all relevant features (buildings, roads, current ground surface cover, individual property boundaries for on-site and applicable off-site properties, contaminant sources, utility lines, monitoring wells and potable wells) within the contaminated area. This map is to show the location of all contaminated public streets, and highway and railroad rights-of-way in relation to the source property and in relation to the boundaries of groundwater contamination exceeding a ch. NR 140 Enforcement Standard (ES), and/or in relation to the boundaries of soil contamination exceeding a Residual Contaminant Level (RCL) or a Site Specific Residual Contaminant Levels (SSRCL) as determined under ss. NR 720.09, 720.11 and 720.19, Wis. Adm. Code.

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

B.2. Soil Figures

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

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

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

B.3. Groundwater Figures

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

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

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

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

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

B.4. Vapor Maps and Other Media

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

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

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

Documentation of Remedial Action (Attachment C)

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

General Directions:

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

C.1. **Site investigation documentation,** that has not otherwise been previously submitted.

C.2. **Investigative waste** disposal documentation.

C.3. **NR 720.19 analysis**, assumptions and calculations for site specific RCLs (SSRCLs) , with justification, including EPA Soil Screening Level Model Calculations and results.

C.4. **Construction documentation** or as-built report for any constructed remedial action or portion of, or interim action specified in s. NR 724.02(1), Wis. Adm. Code.

C.5. **Decommissioning of Remedial Systems.** Include plans to properly abandon any systems or equipment upon receiving conditional closure.

C.6. **Photos.** For sites or facilities with a cover or other performance standard, a structural impediment or a vapor mitigation system. Include one or more photographs documenting the condition and extent of the feature at the time of the closure request. Pertinent features should be visible and discernible. Photographs must be labeled with the site name, the features shown, location and the date on which the photograph was taken.

C.7. **Other**. Include any other relevant documentation not otherwise noted above. (This section may remain blank)

Maintenance Plan(s) (Attachment D)

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

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

D.1. **Location map(s)** which show(s): (1) the feature that requires maintenance; (2) the location of the feature(s) that require(s) maintenance - on and off the source property; (3) the extent of the structure or feature(s) to be maintained, in relation to other structures or features on the site; (4) the extent and type of residual contamination; and (5) and all property boundaries.

D.2. **Brief descriptions** of the type, depth and location of residual contamination.

D.3. **Description of maintenance action(s)** required for maximizing effectiveness of the engineered control, vapor mitigation system, feature or other action for which maintenance is required.

D.4. **Inspection log**, to be maintained on site, or at a location specified in the maintenance plan or approval letter.

D.5. **Contact information,** including the name, address and phone number of the individual or facility who will be conducting the maintenance.

Monitoring Well Information (Attachment E)

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

General Directions:

Attach monitoring well construction and development forms (DNR FORM 4400-113 A and B: http://dnr.wi.gov/topic/groundwater/documents/forms/4400_113_1_2.pdf) for all wells that will remain in-use, be transferred to another party or that could not be located. A figure of these wells should be included in Attachment B.3.d.

Select One:

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

Notifications to Owners of Impacted Properties (Attachment F)

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

General Directions:

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

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

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

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

- FORM 4400-246;
- Copy of each letter sent, 30 days or more prior to requesting closure; and
- Proof of receipt for each letter.
- For this site closure, __1__ (number) property (ies) has/have been impacted, the owners have been notified, and copies of the letters and receipts are included in Attachment F.

Source Legal Documents (Attachment G)

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

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

G.1. **Deeds - Source Property and Other Impacted Properties:** The most recent deed with legal descriptions clearly labeled for (1) the **Source Property** (where the contamination originated) and (2) all **off-source** (off-site) properties where letters were required to be sent per the ch. NR 700, Wis. Adm. Code, rule series (e.g., off-site cover maintenance required, lost monitoring well, off-site cover property impacts to groundwater exceeding the ch. NR 140, Wis. Adm. Code.

Note: *If a property has been purchased with a land contract and the purchaser has not yet received a deed, a copy of the land contract which includes the legal description shall be submitted instead of the most recent deed. If the property has been inherited, written documentation of the property transfer should be submitted along with the most recent deed.*

G.2. ***Certified Survey Map:*** *A copy of the certified survey map or the relevant section of the recorded plat map for those properties where the legal description in the most recent deed refers to a certified survey map or a recorded plat map.* (Lots on subdivided or platted property (e.g. lot 2 of xyz subdivision)).

G.3. **Verification of Zoning**: Documentation (e.g., official zoning map or letter from municipality) of the property's or properties' current zoning status.

G.4. **Signed Statement:** A statement signed by the Responsible Party (RP), which states that he or she believes that the attached legal description(s) accurately describe(s) the correct contaminated property or properties.

Signatures and Findings for Closure Determination

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

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

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

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

Engineering Certification

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

Larry Raether, P.E.	Department Manager
Printed Name	Title
Signature	12-5-13 Date
	Stamp and Number

WISCONSIN LARRY D. RAETHER E32733 COLGATE, WI PROFESSIONAL ENGINEER

Hydrogeologist Certification

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

Printed Name	Title
Signature	Date

ATTACHMENT A:
DATA TABLES

A.1- Groundwater Analytical Tables: Included

A.2- Pre-Remedial Soil Analytical Tables: Included

A.3- Post-Remedial Soil Analytical Tables: Not applicable, remedial activities did not take place onsite

A.4- Pre and Post-Remedial Remaining Soil Contamination Soil Analytical Tables: Not applicable, remedial activities did not take place onsite

A.5- Vapor Analytical Tables: Not applicable, vapor encroachment is not a concern at this property

A.6- Other Media of Concern: Not applicable, other media are not of concern at this property

A.7- Water Level Elevations: Not applicable, permanent groundwater monitoring wells were not installed at this property

A.8- Other: Not applicable, no other tables have been prepared

TABLE A.1

Groundwater Analytical Table
Proposed Building Addition - Steel Craft, Inc.
105 Steel Craft Drive
Hartford, Wisconsin

Analytical Parameter	Sample ID / Date / Units	TW-8 3/11/2013	NR 140 ES	NR 140 PAL
Detected VOCs	ug/l	ND	---	---
PAHs				
Acenaphthene	ug/l	ND	---	---
Acenaphthylene	ug/l	0.0052J	---	---
Anthracene	ug/l	ND	3,000	600
Benzo(a)anthracene	ug/l	ND	---	---
Benzo(a)pyrene	ug/l	ND	0.2	0.02
Benzo(b)fluoranthene	ug/l	ND	0.2	0.02
Benzo(g,h,i)perylene	ug/l	ND	---	---
Benzo(k)fluoranthene	ug/l	ND	---	---
Chrysene	ug/l	ND	0.2	0.02
Dibenz(a,h)anthracene	ug/l	ND	---	---
Fluoranthene	ug/l	0.012J	400	80
Fluorene	ug/l	ND	400	80
Indeno(1,2,3-cd)pyrene	ug/l	ND	---	---
1-Methylnaphthalene	ug/l	0.011J	---	---
2-Methylnaphthalene	ug/l	0.017J	---	---
Naphthalene	ug/l	0.017J	100	10
Phenanthrene	ug/l	0.027J	---	---
Pyrene	ug/l	0.016J	250	50

Notes:

Boxed concentrations exceed NR 140 ES

Bold concentrations exceed NR 140 PAL

--- - not analyzed/no standard established

J - concentration detected between the laboratory limit of detection and the limit of quantitation

ES - NR 140 Enforcement Standard

PAH - polynuclear aromatic hydrocarbons

PAL - NR 140 Preventive Action Limit

ug/l - micrograms per liter

VOC - volatile organic compounds

ND - Not detected above laboratory method detection limits

TABLE A.1

Groundwater Analytical Table
Proposed Building Addition - Steel Craft, Inc.
105 Steel Craft Drive
Hartford, Wisconsin

Analytical Parameter	Sample ID / Date / Units	TW-9 4/25/2013	TW-10 4/25/2013	TW-11 4/25/2013	TW-12 4/25/2013	TW-13 4/25/2013	TW-14 4/25/2013	TW-15 4/25/2013	NR 140 ES	NR 140 PAL
PAHs										
Acenaphthene	ug/l	0.016J	0.017J	ND	ND	ND	ND	0.011J	---	---
Acenaphthylene	ug/l	0.0092J	0.014J	ND	ND	0.0077J	ND	0.025J	---	---
Anthracene	ug/l	0.0082J	0.0066J	ND	ND	0.0088J	ND	0.029J	3,000	600
Benzo(a)anthracene	ug/l	0.024J	0.019J	ND	0.0054J	0.038J	ND	0.15	---	---
Benzo(a)pyrene	ug/l	**0.030J**	**0.028J**	ND	ND	**0.052J**	ND	**0.18**	0.2	0.02
Benzo(b)fluoranthene	ug/l	**0.030J**	**0.032J**	ND	ND	**0.059J**	ND	**0.17**	0.2	0.02
Benzo(g,h,i)perylene	ug/l	0.020J	0.027J	ND	ND	0.030J	ND	0.068	---	---
Benzo(k)fluoranthene	ug/l	0.027J	0.024J	ND	ND	0.044J	ND	0.16	---	---
Chrysene	ug/l	**0.031J**	**0.023J**	ND	ND	**0.045J**	ND	**0.18**	0.2	0.02
Dibenz(a,h)anthracene	ug/l	0.0083J	0.0088J	ND	ND	0.012J	ND	0.034J	---	---
Fluoranthene	ug/l	0.045J	0.037J	ND	0.0092J	0.056J	0.0063J	0.30	400	80
Fluorene	ug/l	0.0073J	0.0063J	ND	ND	0.0060J	ND	0.028J	400	80
Indeno(1,2,3-cd)pyrene	ug/l	0.016J	0.021J	ND	ND	0.027J	ND	0.069	---	---
1-Methylnaphthalene	ug/l	0.059	0.041J	0.0074J	0.0048J	0.012J	ND	0.0042J	---	---
2-Methylnaphthalene	ug/l	0.030J	0.028J	0.0092J	0.0085J	0.017J	ND	0.0088J	---	---
Naphthalene	ug/l	0.14	0.17	0.077	0.0092J	0.023J	0.0048J	0.014J	100	10
Phenanthrene	ug/l	0.030J	0.028J	0.0069J	0.011J	0.038J	0.0096J	0.19	---	---
Pyrene	ug/l	0.037J	0.028J	ND	0.0080J	0.043J	0.0064J	0.18	250	50
RCRA Metals										
Arsenic	ug/l	ND	**5.7J**	ND	ND	**5.8J**	ND	**5.0J**	10	1
Barium	ug/l	66.8	60.1	62.9	56.2	96.1	62.8	197	2,000	400
Cadmium	ug/l	0.42J	ND	ND	**0.59J**	ND	0.39J	ND	5	0.5
Chromium	ug/l	1.5J	2.4J	1.6J	ND	ND	2.8J	ND	100	10
Lead	ug/l	ND	ND	**1.9J**	ND	**2.4J**	1.4J	ND	15	1.5
Selenium	ug/l	ND	ND	ND	ND	ND	ND	ND	50	10
Silver	ug/l	ND	ND	ND	ND	ND	ND	ND	50	10
Mercury	ug/l	ND	ND	ND	ND	ND	ND	ND	2	0.2

Notes:

Boxed concentrations exceed NR 140 ES

Bold concentrations exceed NR 140 PAL

--- - not analyzed/no standard established

J - concentration detected between the laboratory limit of detection and the limit of quantitation

ES - NR 140 Enforcement Standard

PAH - polynuclear aromatic hydrocarbons

PAL - NR 140 Preventive Action Limit

ug/l - micrograms per liter

RCRA - resource conservation and recovery act

ND - Not detected above laboratory method detection limits

TABLE A.2
Pre-Remedial Soil Analytical Table
Proposed Building Addition - Steel Craft, Inc.
105 Steel Craft Drive
Hartford, Wisconsin

Analytical Parameter	Depth / Date / Units	SP-1 3' - 5' 3/11/13	SP-2 1' - 5' 3/11/13	SP-3 1' - 5' 3/11/13	SP-3 5' - 10' 3/11/13	SP-4 1' - 5' 3/11/13	SP-5 1' - 5' 3/11/13	SP-6 1' - 3' 3/11/13	SP-7 3' - 5' 3/11/13	SP-8 1' - 5' 3/11/13	NR 720 Generic RCL Indicator Parameter	NR 720 Table 2 RCL Direct Contact/ Industrial	NR 746 Table 1 RCL Soil to Groundwater	NR 661.24 Table 2 (TCLP) Toxicity Characteristic	Site Specific SSLs Soil to Groundwater	Suggested PAH Generic Soil Cleanup Levels Direct Contact/ Industrial	Suggested PAH Generic Soil Cleanup Levels Groundwater Pathway	USGS Background
PID	i.u.	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	---	---	---	---	---	---	---	---
DRO	mg/kg	2.4	6.0	35.9	1.1J	54.0	2.3	23.5	ND	1.4J	100	---	---	---	---	---	---	---
GRO	mg/kg	ND	ND	ND	ND	ND	ND	ND	ND	ND	100	---	---	---	---	---	---	---
Detected VOCs																		
Naphthalene	ug/kg	ND	ND	ND	ND	ND	ND	41.4J	ND	ND	---	---	2,700	---	---	---	---	---
PAHs																		
Acenaphthene	ug/kg	ND	ND	ND	ND	ND	ND	ND	ND	ND	---	---	---	---	---	60,000,000	38,000	---
Acenaphthylene	ug/kg	ND	57.0	ND	ND	77.7	ND	672	ND	ND	---	---	---	---	---	360,000	700	---
Anthracene	ug/kg	3.2J	49.7	ND	ND	128	2.9J	855	ND	4.2J	---	---	---	---	---	300,000,000	3,000,000	---
Benzo(a)anthracene	ug/kg	ND	307	ND	ND	294	11.5J	1890	ND	15.1J	---	---	---	---	---	3,900	17,000	---
Benzo(a)pyrene	ug/kg	10.9J	**485**	ND	15.0J	338	12.9J	**1850**	ND	16.9J	---	---	---	---	---	390	48,000	---
Benzo(b)fluoranthene	ug/kg	12.7J	650	ND	15.5J	268	15.1J	1770	ND	17.5J	---	---	---	---	---	3,900	360,000	---
Benzo(g,h,i)perylene	ug/kg	ND	451	ND	13.5J	218	ND	1110	ND	12.7J	---	---	---	---	---	39,000	6,800,000	---
Benzo(k)fluoranthene	ug/kg	13.2J	351	ND	13.7J	343	14.4J	1900	ND	17.0J	---	---	---	---	---	39,000	870,000	---
Chrysene	ug/kg	17.9J	457	ND	13.3J	339	18.0J	2170	2.1J	19.3J	---	---	---	---	---	390,000	37,000	---
Dibenz(a,h)anthracene	ug/kg	ND	138	ND	ND	72.4J	ND	**432**	ND	ND	---	---	---	---	---	390	38,000	---
Fluoranthene	ug/kg	20.8	399	ND	11.5J	513	27.8	3980	ND	25.5	---	---	---	---	---	40,000,000	500,000	---
Fluorene	ug/kg	ND	ND	ND	ND	ND	ND	323J	ND	ND	---	---	---	---	---	40,000,000	100,000	---
Indeno(1,2,3-cd)pyrene	ug/kg	ND	356	ND	ND	174	ND	1030	ND	10.7J	---	---	---	---	---	3,900	680,000	---
1-Methylnaphthalene	ug/kg	ND	13.0J	ND	ND	ND	ND	208J	ND	ND	---	---	---	---	---	70,000,000	23,000	---
2-Methylnaphthalene	ug/kg	4.6J	18.3J	11.7J	2.2J	25.6J	3.9J	248J	ND	2.0J	---	---	---	---	---	40,000,000	20,000	---
Naphthalene	ug/kg	7.9J	15.9J	5.7J	4.3J	23.9J	4.3J	231J	ND	ND	---	---	---	---	---	110,000	400	---
Phenanthrene	ug/kg	11.8J	118	6.8J	6.2J	212	14.1J	3480	3.7J	10.7J	---	---	---	---	---	390,000	1,800	---
Pyrene	ug/kg	19.0J	433	ND	13.2J	743	22.8	3390	ND	23.4	---	---	---	---	---	30,000,000	8,700,000	---
RCRA Metals																		
Arsenic	mg/kg	**5.1**	**6.6**	**15.8**	**7.4**	**5.4**	**7.4**	**5.2**	**3.6**	**9.3**	---	1.6	---	---	---	---	---	< 0.1 - 73
Barium	mg/kg	98.6	83.0	2840	136	40.5	88.1	74.0	18.2	107	---	---	---	---	---	---	---	10 - 1,500
Cadmium	mg/kg	0.46J	0.43J	8.4	0.48J	0.24J	0.37J	0.35J	0.13J	0.37J	---	510	---	---	---	---	---	---
Chromium	mg/kg	21.8	22.8	116	29.9	11.2	26.4	20.5	6.1	29.5	---	200*	---	---	---	---	---	1-1,000
Lead	mg/kg	19.7	**2070**	**7880**	29.9	24.5	12.6	168	4.0	14.7	---	500	---	---	---	---	---	< 10 - 300
Mercury	mg/kg	0.061	0.075	0.087	0.044	0.045	0.032	0.043	0.0024J	0.048	---	---	---	---	---	---	---	0.01 - 3.4
Selenium	mg/kg	ND	ND	ND	ND	ND	ND	ND	ND	ND	---	---	---	---	---	---	---	< 0.01 - 3.9
Silver	mg/kg	ND	ND	2.0	ND	ND	ND	ND	ND	ND	---	---	---	---	3.1	---	---	---
TCLP Lead	mg/L	---	0.039	4.6	---	---	---	---	---	---	---	---	---	5	---	---	---	---

Notes:
Bold concentrations exceed NR 720 Table 2/Suggested PAH industrial direct contact RCLs
Boxed concentrations exceed suggested PAH protection of groundwater RCL
--- - Not analyzed/Not Established
J - concentration detected between the laboratory Limit of Detection and the Limit of Quantitation and are not considered to be substantial
i.u. - instrument units
mg/kg -milligrams per kilogram, parts per million
ug/kg -micrograms per kilogram, parts per billion
mg/L -milligrams per Liter
PAH - polynuclear aromatic hydrocarbons
GRO - gasoline range organics
DRO - diesel range organics
PID - photoionization detector
RCL - residual contaminant level
VOC - volatile organic compounds
RCRA - resource conservation and recovery act
ND - Not detected above laboratory method detection limits
USGS - United States Geological Survey
SSL - Soil Screening Level
TCLP - Toxicity Characteristic Leaching Procedure
* - Total Chromium laboratory analytical results are comprised of a 6 to 1 ratio of trivalent chromium to hexavalent chromium; therefore, it is more appropriate to evaluate detected chromium contaminants with respect to this ratio.

TABLE A.2

Pre-Remedial Soil Analytical Table
Proposed Building Addition - Steel Craft, Inc.
105 Steel Craft Drive
Hartford, Wisconsin

Analytical Parameter	Depth / Date / Units	SP-9 1' - 5' 4/25/13	SP-10 1' - 5' 4/25/13	SP-11 1' - 5' 4/25/13	SP-12 1' - 3' 4/25/13	SP-13 1' - 3' 4/25/13	SP-14 1' - 3' 4/25/13	SP-15 1' - 5' 4/25/13	NR 720 Table 2 RCL Direct Contact/ Industrial	Site Specific SSLs Soil to Groundwater	Suggested PAH Generic Soil Cleanup Levels Direct Contact/ Industrial	Suggested PAH Generic Soil Cleanup Levels Groundwater Pathway	USGS Background
PID	i.u.	0.0	0.0	0.0	0.0	0.0	0.0	0.0	---	---	---	---	---
PAHs													
Acenaphthene	ug/kg	ND	ND	ND	ND	ND	ND	ND	---	---	60,000,000	38,000	---
Acenaphthylene	ug/kg	35.4	ND	ND	ND	11.9J	ND	157	---	---	360,000	700	---
Anthracene	ug/kg	45.4	6.7J	ND	ND	22.0	5.2J	284	---	---	300,000,000	3,000,000	---
Benzo(a)anthracene	ug/kg	146	16.4J	16.6J	ND	98.4	25.3	637	---	---	3,900	17,000	---
Benzo(a)pyrene	ug/kg	175	21.7J	22.0	ND	136	33.7	**715**	---	---	390	48,000	---
Benzo(b)fluoranthene	ug/kg	160	19.1J	27.5	ND	144	41.3	685	---	---	3,900	360,000	---
Benzo(g,h,i)perylene	ug/kg	124	21.4J	17.1J	ND	112	28.0	497	---	---	39,000	6,800,000	---
Benzo(k)fluoranthene	ug/kg	183	20.0J	25.6	ND	127	32.0	711	---	---	39,000	870,000	---
Chrysene	ug/kg	191	23.0	23.6	ND	136	42.6	905	---	---	390,000	37,000	---
Dibenz(a,h)anthracene	ug/kg	42.9	ND	ND	ND	38.0	ND	172	---	---	390	38,000	---
Fluoranthene	ug/kg	299	40.3	21.6J	ND	175	49.3	1,590	---	---	40,000,000	500,000	---
Fluorene	ug/kg	10.5J	ND	ND	ND	ND	ND	117	---	---	40,000,000	100,000	---
Indeno(1,2,3-cd)pyrene	ug/kg	111	14.3J	14.7J	ND	99.0	23.3	434	---	---	3,900	680,000	---
1-Methylnaphthalene	ug/kg	ND	ND	ND	ND	25.0	ND	ND	---	---	70,000,000	23,000	---
2-Methylnaphthalene	ug/kg	10.6J	3.3J	ND	ND	32.6	6.3J	68.1J	---	---	40,000,000	20,000	---
Naphthalene	ug/kg	18.6J	9.9J	ND	ND	32.0	6.3J	105	---	---	110,000	400	---
Phenanthrene	ug/kg	149	29.2	8.3J	ND	101	23.9	893	---	---	390,000	1,800	---
Pyrene	ug/kg	244	34.3	19.5J	ND	150	39.8	1,230	---	---	30,000,000	8,700,000	---
RCRA Metals													
Arsenic	mg/kg	**4.5**	**5.1**	**6.2**	**12.1**	**9.6**	**5.1**	**13.2**	1.6	---	---	---	< 0.1 - 73
Barium	mg/kg	59.0	130	121	92.4	88.1	241	144.0	---	---	---	---	10 - 1,500
Cadmium	mg/kg	0.35J	0.54J	0.63	0.66	0.73	0.70	0.77	510	---	---	---	---
Chromium	mg/kg	19.2	20.1	20.6	25.5	21.4	23.0	51.1	200*	---	---	---	1-1,000
Lead	mg/kg	23.2	20.7	17.1	12.8	71.8	**1,430**	28.4	500	---	---	---	< 10 - 300
Mercury	mg/kg	0.039	0.045	0.047	0.027	0.027	0.053	0.14	---	---	---	---	0.01 - 3.4
Selenium	mg/kg	ND	ND	ND	ND	ND	ND	ND	---	---	---	---	< 0.01 - 3.9
Silver	mg/kg	ND	ND	ND	ND	ND	ND	ND	---	3.1	---	---	---

Notes:
Bold concentrations exceed NR 720 Table 2/Suggested PAH industrial direct contact RCLs
Boxed concentrations exceed suggested PAH protection of groundwater RCL
--- - Not analyzed/Not Established
J - concentration detected between the laboratory Limit of Detection and the Limit of Quantitation and are not considered to be substantial
i.u. - instrument units
mg/kg -milligrams per kilogram, parts per million
ug/kg -micrograms per kilogram, parts per billion
PAH - polynuclear aromatic hydrocarbons
PID - photoionization detector
RCL - residual contaminant level
RCRA - resource conservation and recovery act
ND - Not detected above laboratory method detection limits
USGS - United States Geological Survey
SSL - Soil Screening Level
* - Total Chromium laboratory analytical results are comprised of a 6 to 1 ratio of trivalent chromium to hexavalent chromium; therefore, it is more appropriate to evaluate detected chromium contaminants with respect to this ratio.

A.3- Post-Remedial Soil Analytical Tables: Not applicable, remedial activities did not take place onsite

A.4- Pre and Post-Remedial Remaining Soil Contamination Soil Analytical Tables: Not applicable, remedial activities did not take place onsite

A.5- Vapor Analytical Tables: Not applicable, vapor encroachment is not a concern at this property

A.6- Other Media of Concern: Not applicable, other media are not of concern at this property

A.7- Water Level Elevations: Not applicable, permanent groundwater monitoring wells were not installed at this property

A.8- Other: Not applicable, no other tables have been prepared

ATTACHMENT B:
MAPS AND FIGURES

B.1- Location Maps

B.1.a- Location Map: Included

B.1.b- Detailed Site Map: Included

B.1.c- RR Site Map: Included

B.2- Soil Figures

B.2.a- Pre-Remedial Soil Contamination: Included

B.2.b- Post-Remedial Soil Contamination: Not applicable, remedial activities did not take place onsite

B.2.c- Pre/Post Remaining Soil Contamination: Not applicable, remedial activities did not take place onsite

B.3- Groundwater Figures

B.3.a- Geologic Cross-Section Figures: Included

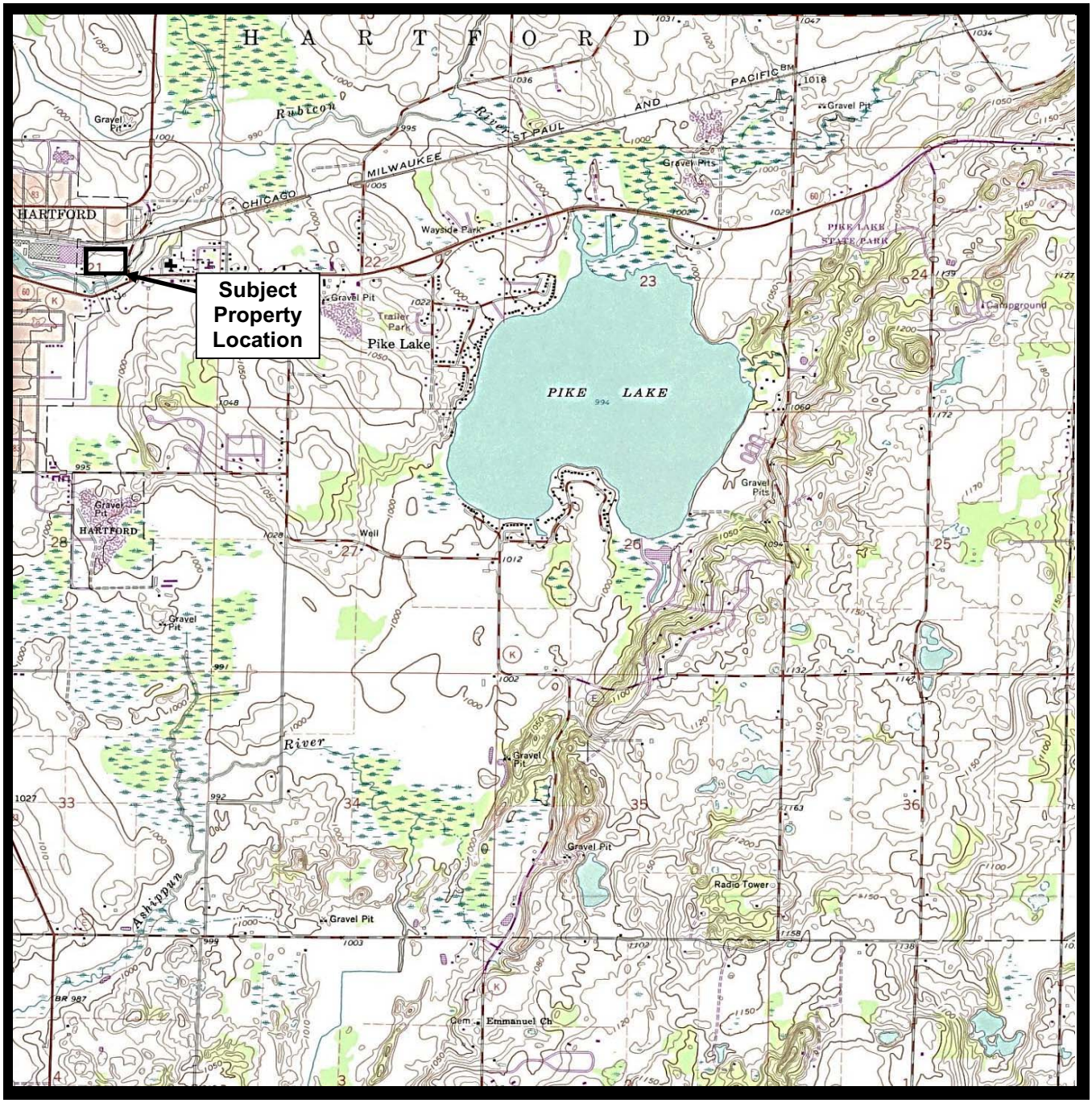
B.3.b- Groundwater Isoconcentration Map: Included

B.3.c- Groundwater Flow Direction: Not applicable, permanent groundwater monitoring wells were not installed at this property

B.3-d: Monitoring Wells: Not applicable, permanent groundwater monitoring wells were not installed at this property

B.4- Vapor Maps and Other Media

B.4.a-B.4.c- Not applicable, vapors and other media are not a concern at this property.



Source: United States Geological Survey, Hartford East, Wisconsin, 7.5-Minute Topographic Maps, 1959, photorevised 1971, photoinspected 1976

N

SCALE 1:24,000
APPROXIMATE SCALE

0 1 2

0 1000 2000 3000 4000 5000 6000 7000 8000 FEET

0 1 2 KILOMETERS

CONTOUR INTERVAL 10 FEET

Southwest ¼ of the Northeast ¼ of Section 21, Township 10 North, Range 18 East

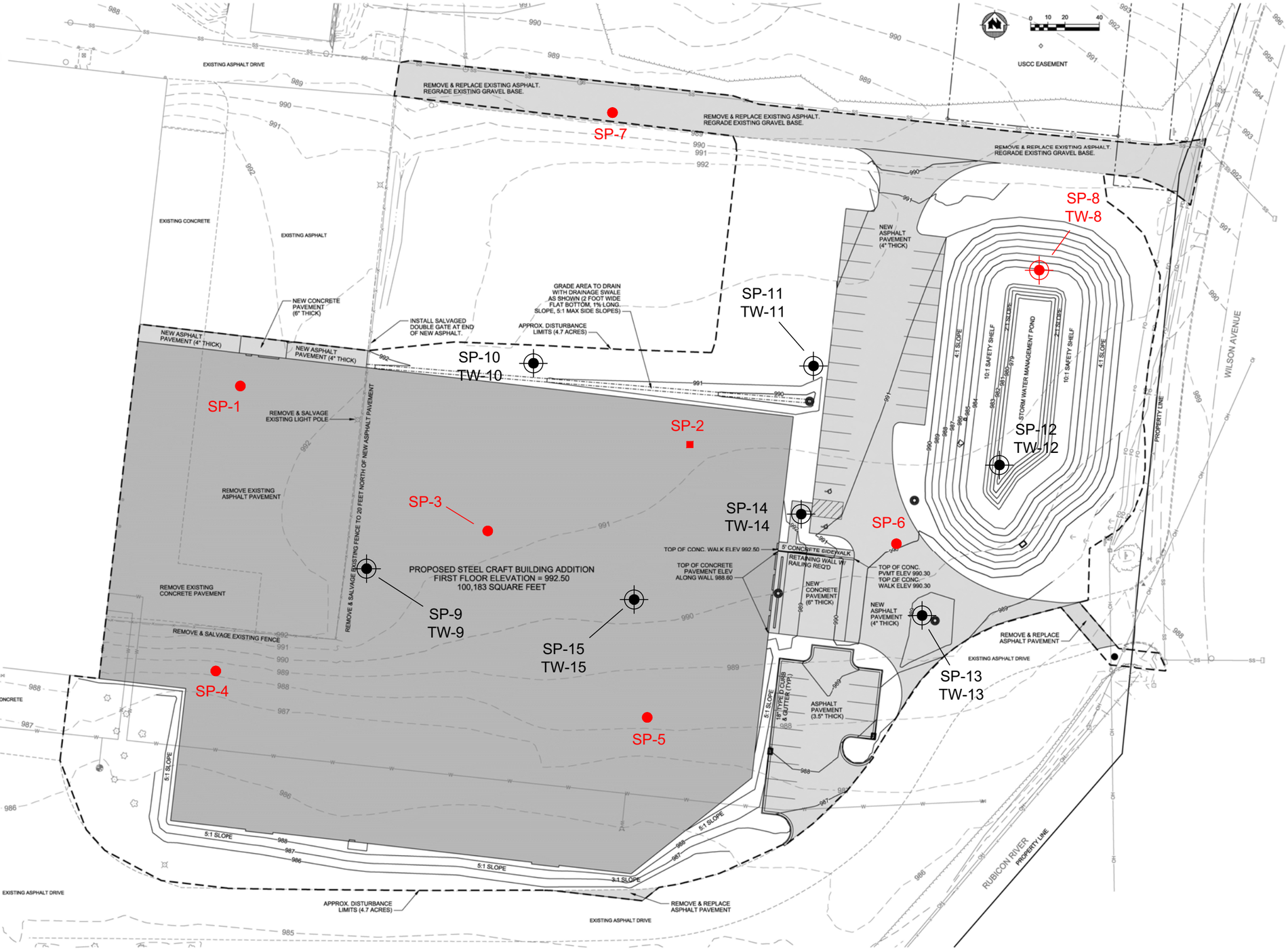
psi Information To Build On Engineering • Consulting • Testing	Environmental Services W237 N2878 Woodgate Road, Suite 2 Pewaukee, Wisconsin 53072 (262) 347-0898 Fax (262) 347-2256	Proposed Building Addition-Steel Craft, Inc. 105 Steel Craft Drive Hartford, Wisconsin 53027 **Location Map**	DATE: 10/3/2013	PROJECT NO: 0054614 **Figure B.1.a**

LEGEND:

SP-1 ● PHASE 2 ESA SOIL BORING LOCATION

SP-8 / TW-8 ⊕ PHASE 2 ESA SOIL BORING/TEMPORARY MONITORING WELL LOCATION

SP-9 / TW-9 ⊕ SUPPLEMENTAL PHASE 2 ESA SOIL BORING/TEMPORARY MONITORING WELL LOCATION



ALL LOCATIONS ARE APPROXIMATE

0 60'
GRAPHIC SCALE

psi *Information To Build On*
Engineering • Consulting • Testing

Environmental Services
W237 N2878 Woodgate Road, Suite 2
Pewaukee, Wisconsin 53072
(262) 347-0898 (262) 347-2256 fax

Detailed Site Map

Steel Craft Corporation - Building Addition
Hartford Investment LLC
City of Hartford, Washington County, Wisconsin

Checked:	Scale:	Date:	Figure:
M. Dahlem	1" = 60'	May 23, 2013	B.1.b

Drawn:	Project Number:
C. Moran 0054614-1 May 2013.dwg	0054614

Figure B.1.c: RR Site Map

Legend

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

0 300 600 900 ft.

Map created on Jul 19, 2013

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

Scale: 1:2,991

LEGEND:

- PAH SOIL CONTAMINATION ABOVE WDNR STANDARDS (1–5' BGS)
- LEAD SOIL CONTAMINATION ABOVE WDNR STANDARDS (1–5' BGS)
- HIGH LEVELS OF LEAD IN SOIL (>1,000 mg/kg) (1–5' BGS)
- CADMIUM SOIL CONTAMINATION ABOVE WDNR STANDARDS (1–5' BGS)

SP-1 ● PHASE 2 ESA SOIL BORING LOCATION

SP-8 TW-8 ⊕ PHASE 2 ESA SOIL BORING/TEMPORARY MONITORING WELL LOCATION

SP-9 TW-9 ⊕ SUPPLEMENTAL PHASE 2 ESA SOIL BORING/TEMPORARY MONITORING WELL LOCATION

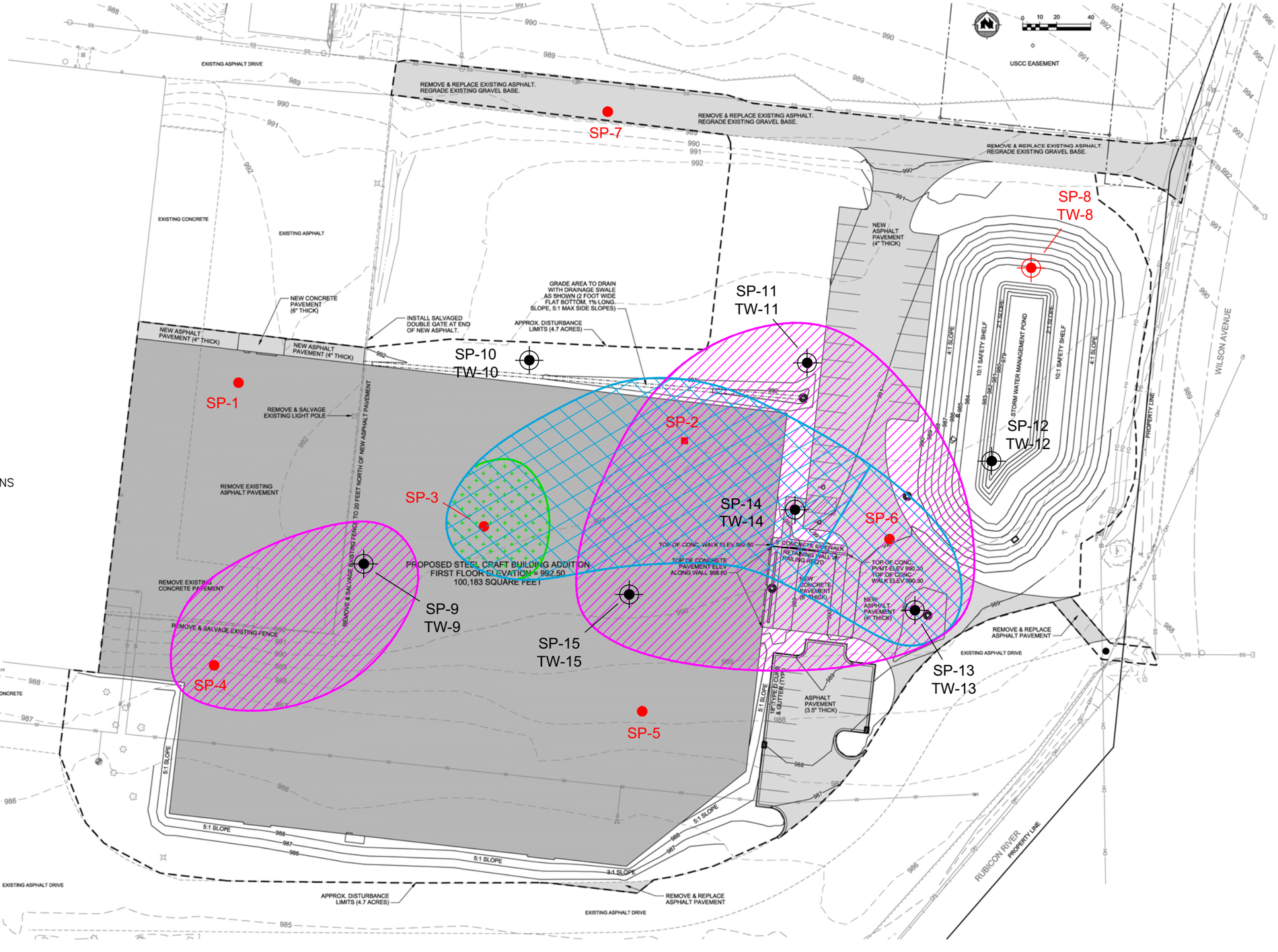
BGS = BELOW GROUND SURFACE

mg/kg = MILLIGRAMS PER KILOGRAMS

WDNR = WISCONSIN DEPARTMENT OF NATURAL RESOURCES

ESA = ENVIRONMENTAL SITE ASSESSMENT

PAH = POLYNUCLEAR AROMATIC HYDROCARBONS



ALL LOCATIONS ARE APPROXIMATE

Information To Build On

Engineering • Consulting • Testing

Environmental Services

W237 N2878 Woodgate Road, Suite 2
Pewaukee, Wisconsin 53072
(262) 347-0898 (262) 347-2256 fax

Pre-Remedial Soil Contamination Map

Steel Craft Corporation - Building Addition
Hartford Investment LLC
City of Hartford, Washington County, Wisconsin

Checked:	Scale:	Date:	Figure:
M. Dahlem	1" = 60'	May 15, 2013	B.2.a

Drawn: C. Moran
0054614-1 May 2013.dwg

Project Number: 0054614

B.2.b- Post-Remedial Soil Contamination: Not applicable, remedial activities did not take place onsite

B.2.c- Pre/Post Remaining Soil Contamination: Not applicable, remedial activities did not take place onsite

LEGEND:

- PAH SOIL CONTAMINATION ABOVE WDNR STANDARDS (1–5' BGS)
- LEAD SOIL CONTAMINATION ABOVE WDNR STANDARDS (1–5' BGS)
- HIGH LEVELS OF LEAD IN SOIL (>1,000 mg/kg) (1–5' BGS)
- CADMIUM SOIL CONTAMINATION ABOVE WDNR STANDARDS (1–5' BGS)

SP-1 ● PHASE 2 ESA SOIL BORING LOCATION

SP-8 TW-8 PHASE 2 ESA SOIL BORING/TEMPORARY MONITORING WELL LOCATION

SP-9 TW-9 SUPPLEMENTAL PHASE 2 ESA SOIL BORING/TEMPORARY MONITORING WELL LOCATION

BGS = BELOW GROUND SURFACE

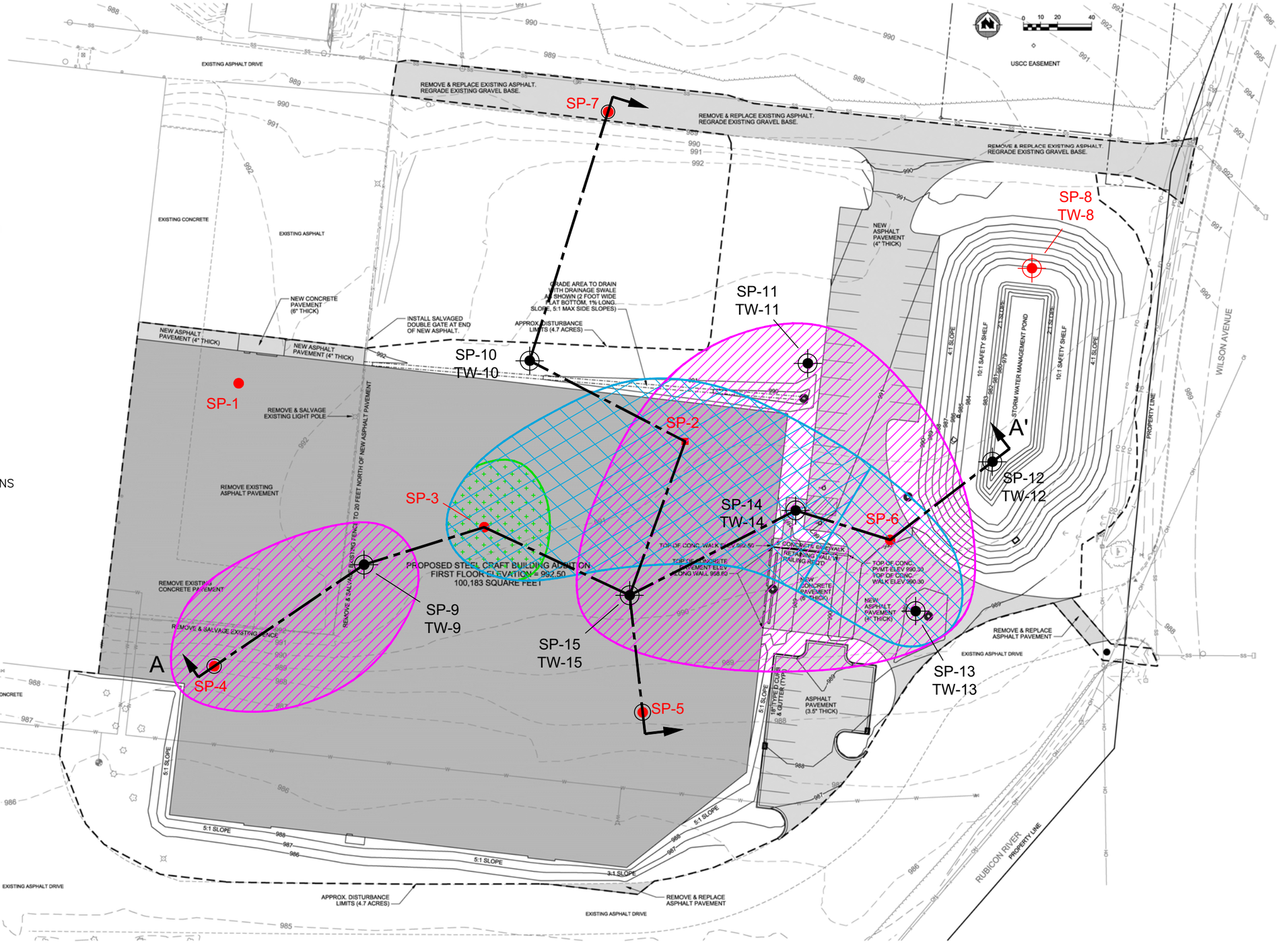
mg/kg = MILLIGRAMS PER KILOGRAMS

WDNR = WISCONSIN DEPARTMENT OF NATURAL RESOURCES

ESA = ENVIRONMENTAL SITE ASSESSMENT

PAH = POLYNUCLEAR AROMATIC HYDROCARBONS

A A' CROSS–SECTION LOCATION



ALL LOCATIONS ARE APPROXIMATE

0 60' GRAPHIC SCALE

psi *Information To Build On*

Engineering • Consulting • Testing

Environmental Services

W237 N2878 Woodgate Road, Suite 2
Pewaukee, Wisconsin 53072

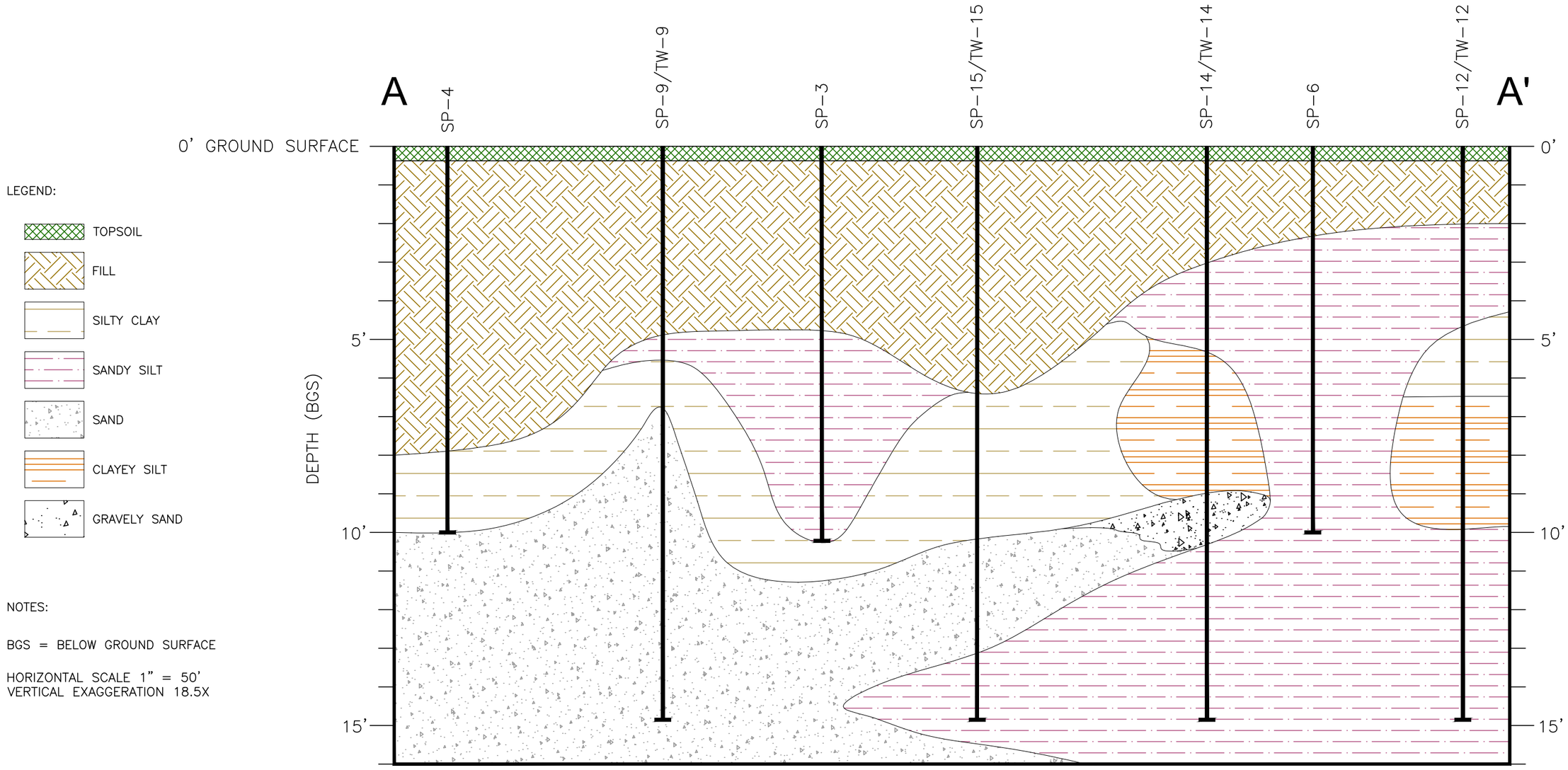
(262) 347-0898 (262) 347-2256 fax

Geologic Cross-Section Figure 1

Steel Craft Corporation - Building Addition
Hartford Investment LLC
City of Hartford, Washington County, Wisconsin

Checked:	Scale:	Date:	Figure:
M. Dahlem	1" = 60'	June 10, 2013	B.3.a.1

Drawn:	Project Number:
C. Moran 0054614-1 May 2013 x-sect.dwg	0054614



NOTES:

BGS = BELOW GROUND SURFACE

HORIZONTAL SCALE 1" = 50'
VERTICAL EXAGGERATION 18.5X

ALL LOCATIONS ARE APPROXIMATE

0 60'
GRAPHIC SCALE

psi Information To Build On
Engineering • Consulting • Testing

Environmental Services
W237 N2878 Woodgate Road, Suite 2
Pewaukee, Wisconsin 53072
(262) 347-0898 (262) 347-2256 fax

Geological Cross-Section Figure 2

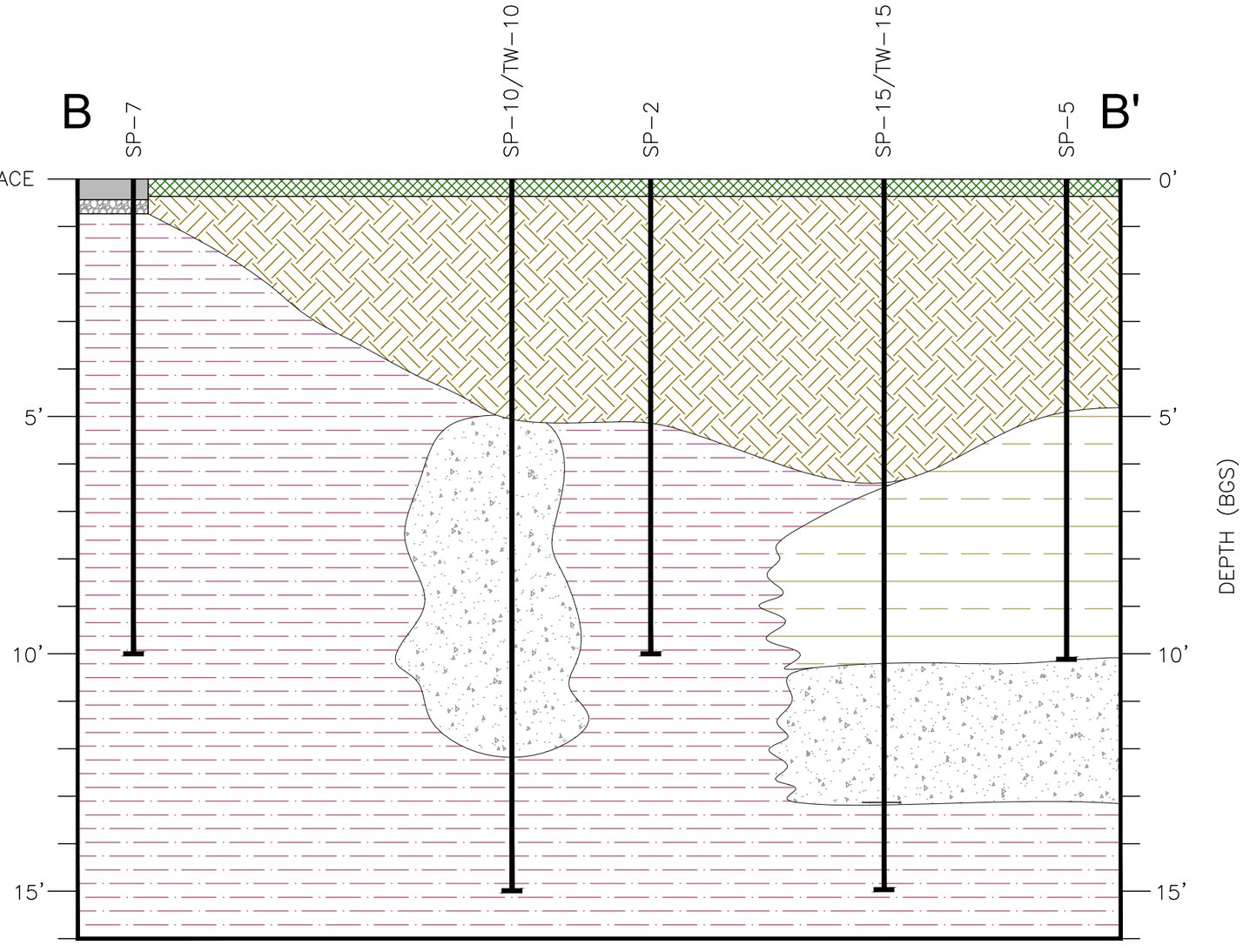
Steel Craft Corporation - Building Addition
Hartford Investment LLC
City of Hartford, Washington County, Wisconsin

Checked:	Scale:	Date:	Figure:
M. Dahlem	1" = 60'	June 10, 2013	B.3.a.2

Drawn:	Project Number:
C. Moran 0054614-1 May 2013 x-sect.dwg	0054614

LEGEND:

- ASPHALT
- BASE COURSE
- TOPSOIL
- FILL
- SANDY SILT
- SAND
- SILTY CLAY



NOTES:

BGS = BELOW GROUND SURFACE

HORIZONTAL SCALE 1" = 50'
VERTICAL EXAGGERATION 18.5X

ALL LOCATIONS ARE APPROXIMATE

psi *Information To Build On*
Engineering • Consulting • Testing

Environmental Services
W237 N2878 Woodgate Road, Suite 2
Pewaukee, Wisconsin 53072
(262) 347-0898 (262) 347-2256 fax

Geological Cross-Section Figure 3

Steel Craft Corporation - Building Addition
Hartford Investment LLC
City of Hartford, Washington County, Wisconsin

Checked:	Scale:	Date:	Figure:
M. Dahlem	1" = 60'	June 10, 2013	B.3.a.3

Drawn:	Project Number:
C. Moran 0054614-1 May 2013 x-sect.dwg	0054614

LEGEND:

PAH GROUNDWATER CONTAMINATION ABOVE NR 140 PAL

SP-1 PHASE 2 ESA SOIL BORING LOCATION

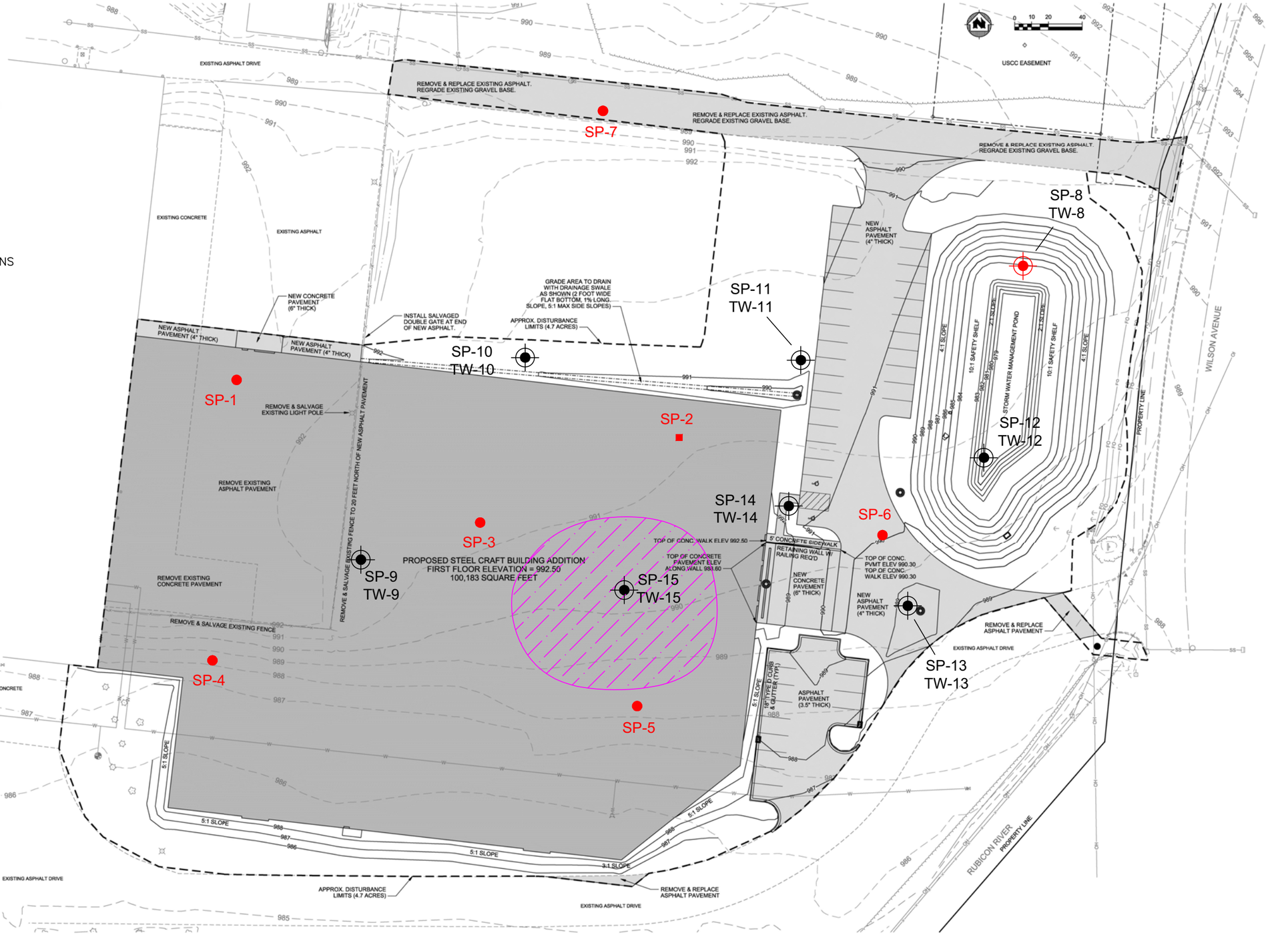
SP-8 / TW-8 PHASE 2 ESA SOIL BORING/TEMPORARY MONITORING WELL LOCATION

SP-9 / TW-9 SUPPLEMENTAL PHASE 2 ESA SOIL BORING/TEMPORARY MONITORING WELL LOCATION

ESA = ENVIRONMENTAL SITE ASSESSMENT

PAH = POLYNUCLEAR AROMATIC HYDROCARBONS

PAL = PREVENTATIVE ACTION LIMIT



ALL LOCATIONS ARE APPROXIMATE

0 60'
GRAPHIC SCALE

psi *Information To Build On*
Engineering • Consulting • Testing

Environmental Services
W237 N2878 Woodgate Road, Suite 2
Pewaukee, Wisconsin 53072
(262) 347-0898 (262) 347-2256 fax

Groundwater Isoconcentration Map

Steel Craft Corporation - Building Addition
Hartford Investment LLC
City of Hartford, Washington County, Wisconsin

Checked:	Scale:	Date:	Figure:
M. Dahlem	1" = 60'	May 15, 2013	B.3.b

Drawn:	Project Number:
C. Moran 0054614-1 May 2013.dwg	0054614

B.3.c- Groundwater Flow Direction: Not applicable, permanent groundwater monitoring wells were not installed at this property

B.3.d: Monitoring Wells: Not applicable, permanent groundwater monitoring wells were not installed at this property

B.4.a-B.4.c- Not applicable, vapors and other media are not a concern at this property.

ATTACHMENT C:
DOCUMENTATION OF REMEDIAL ACTION

C.1- Site Investigation Documentation: Previously Submitted to WDNR
Request for Case Closure Report, dated June 13, 2013

C.2- Investigative Waste Disposal Documentation: Included

C.3- NR 720.19 Analysis: Previously Submitted to WDNR
Request for Case Closure Report, dated June 13, 2013

C.4- Construction Documentation: Included

C.5- Decommissioning of Remedial Systems: Not applicable, remedial activities did not take place onsite

C.6- Photos: Included

C.7- Other: Not applicable, no other relevant documentation

C.2- Investigative Waste Disposal Documentation

Investigative Waste Disposal:

During the Initial and Supplemental Phase II Environmental Site Assessment that were conducted at the Steel Craft Site located in Hartford, WI (BRRTS 02-67-560533), investigative derived waste was thinly spread on the ground surface near each boring location. A map showing a clearly labeled cap of the proposed building and parking areas can be found in the attached Maintenance Plan.

Areas not covered with the building pad or parking area have been covered with at least two feet of clean fill.

C.4- Construction Documentation

LEGEND:

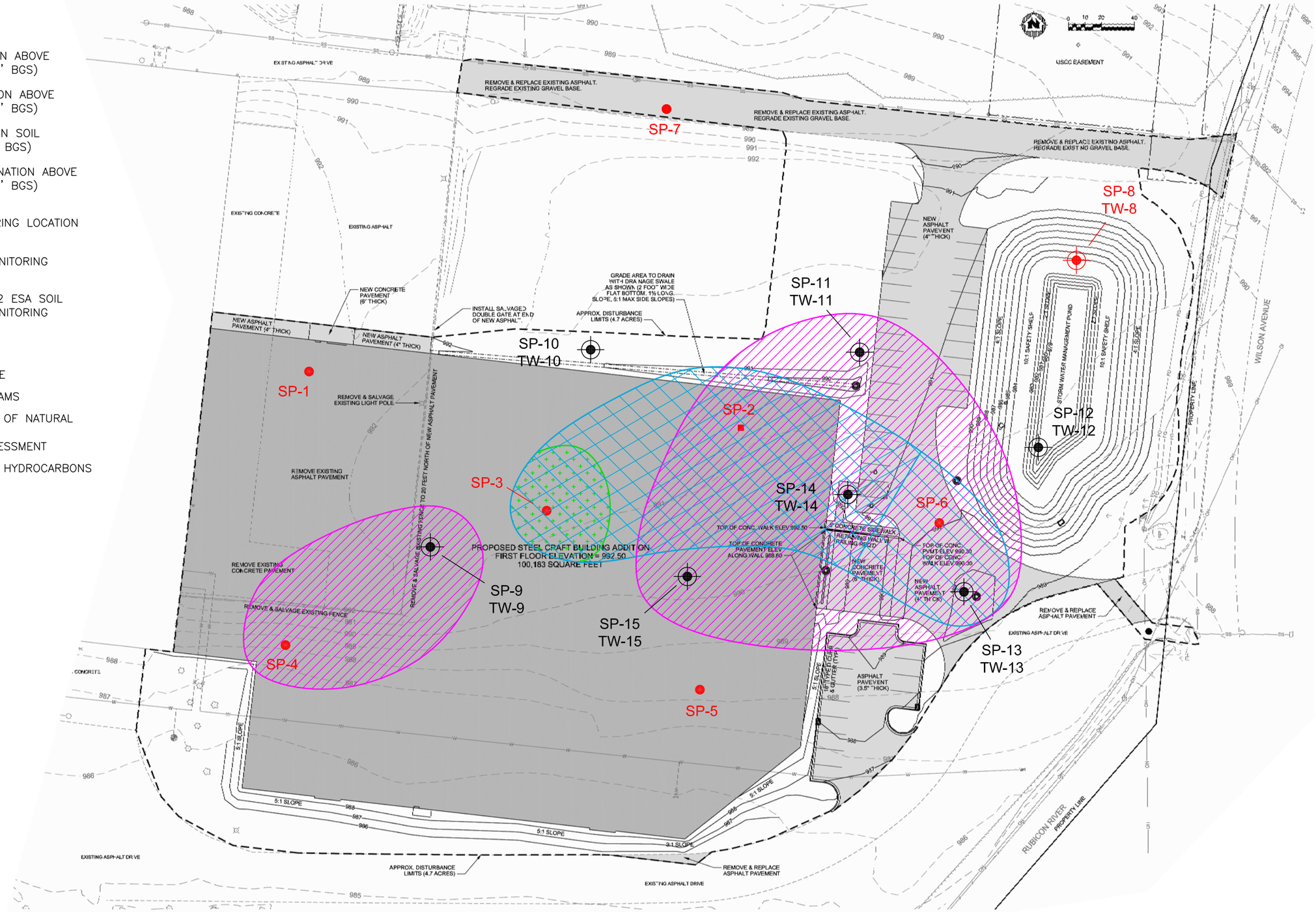
- PAH SOIL CONTAMINATION ABOVE WDNR STANDARDS (1–5' BGS)
- LEAD SOIL CONTAMINATION ABOVE WDNR STANDARDS (1–5' BGS)
- HIGH LEVELS OF LEAD IN SOIL (>1,000 mg/kg) (1–5' BGS)
- CADMIUM SOIL CONTAMINATION ABOVE WDNR STANDARDS (1–5' BGS)

SP-1 — PHASE 2 ESA SOIL BORING LOCATION

SP-8 / TW-8 — PHASE 2 ESA SOIL BORING/TEMPORARY MONITORING WELL LOCATION

SP-9 / TW-9 — SUPPLEMENTAL PHASE 2 ESA SOIL BORING/TEMPORARY MONITORING WELL LOCATION

BGS = BELOW GROUND SURFACE
mg/kg = MILLIGRAMS PER KILOGRAMS
WDNR = WISCONSIN DEPARTMENT OF NATURAL RESOURCES
ESA = ENVIROMENTAL SITE ASSESSMENT
PAH = POLYNUCLEAR AROMATIC HYDROCARBONS



ALL LOCATIONS ARE APPROXIMATE

psi *Information To Build On*
Engineering • Consulting • Testing

Environmental Services
W237 N2878 Woodgate Road, Suite 2
Pewaukee, Wisconsin 53072
(262) 347-0898 (262) 347-2256 fax

Soil Contamination Map
Steel Craft Corporation - Building Addition
Hartford Investment LLC
City of Hartford, Washington County, Wisconsin

Checked:	Scale:	Date:	Figure:
M. Dahlem	1" = 60'	May 15, 2013	3

Drawn:	Project Number:
C. Moran 0054614-1 May 2013.dwg	0054-614

C.6- Photos

Photo 1: South side of building addition, looking east

Photo 2: Southeast corner of building addition and paved areas, looking southwest

Photo 3: East side of building addition and paved parking areas, looking north

Photo 4: East side of building addition and paved parking areas, looking south

Photo 5: Driveway, parking areas, and stormwater management pond, looking north

Photo 6: Stormwater management pond, looking southeast

ATTACHMENT D:
MAINTENANCE PLAN

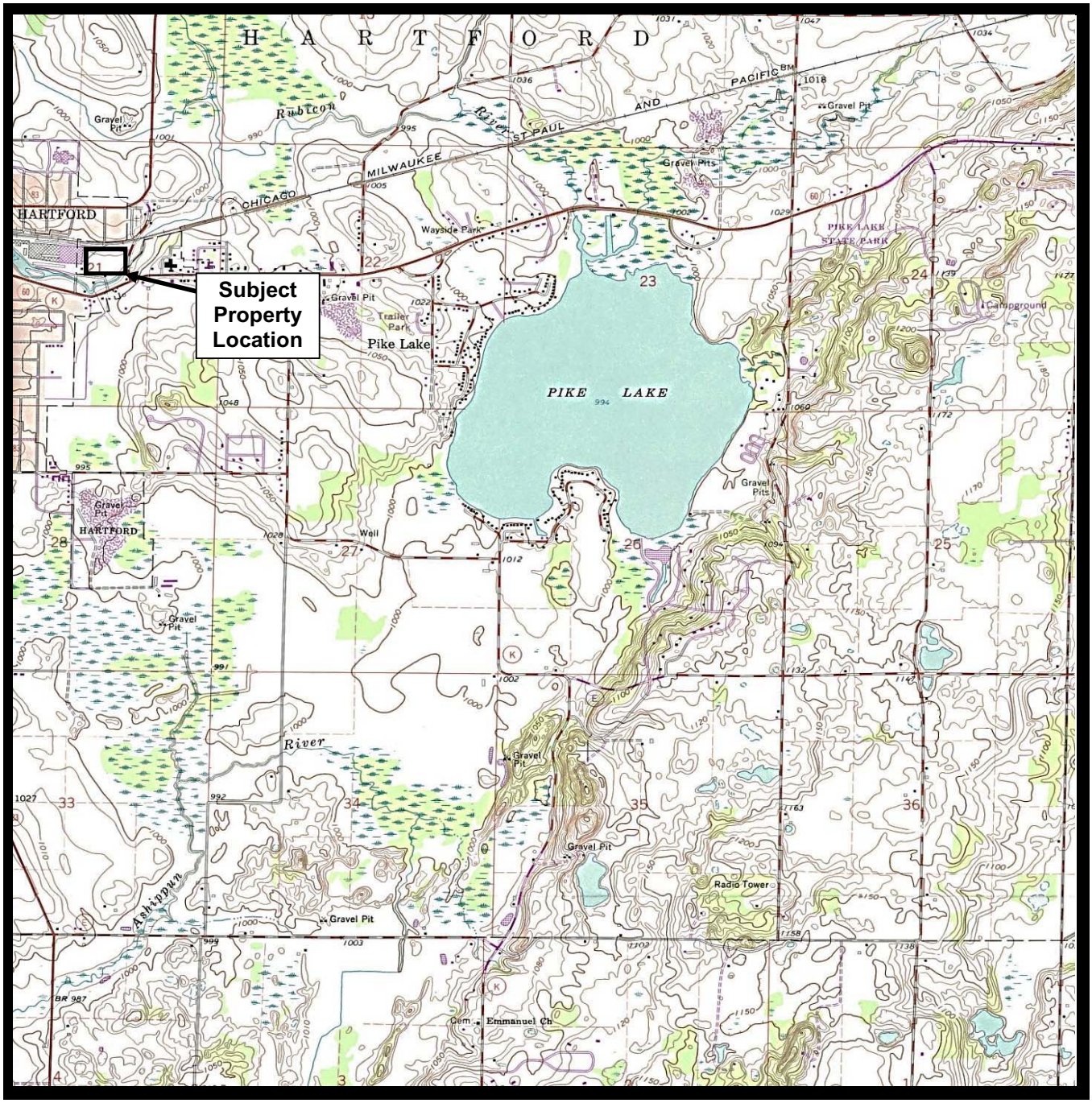
D.1- Location Map: Included

D.2- Brief Descriptions: Included

D.3- Description of Maintenance Actions: Included

D.4- Inspection Log: Included

D.5- Contact Information: Included



Source: United States Geological Survey, Hartford East, Wisconsin, 7.5-Minute Topographic Maps, 1959, photorevised 1971, photoinspected 1976

N

SCALE 1:24,000
APPROXIMATE SCALE

0 1 2

0 1000 2000 3000 4000 5000 6000 7000 8000 FEET

0 1 2 KILOMETERS

CONTOUR INTERVAL 10 FEET

Southwest ¼ of the Northeast ¼ of Section 21, Township 10 North, Range 18 East

psi Information To Build On Engineering • Consulting • Testing	Environmental Services W237 N2878 Woodgate Road, Suite 2 Pewaukee, Wisconsin 53072 (262) 347-0898 Fax (262) 347-2256	Proposed Building Addition-Steel Craft, Inc. 105 Steel Craft Drive Hartford, Wisconsin 53027 **Location Map**	DATE: 10/3/2013	PROJECT NO: 0054614 **Figure D.1**

SOIL/PAVEMENT COVER AND BUILDING BARRIER MAINTENANCE PLAN

December 5, 2013

Property Located at:

105 Steel Craft Drive

Hartford, Wisconsin 53027

WDNR BRRTS No.: 02-67-560533

WDNR FID No.: 267008940

Lot Two (2) of CERTIFIED SURVEY MAP NO. 5590, recorded in the Washington County Registry on March 6, 2003 in Volume 40 of Certified Survey Maps, pages 163-167 as Document No. 978423, being a survey of part of Block K of A.M. According to the "Hartford East, Wisconsin" topographic map, the Subject Property is located in the Southwest ¼ of the Northeast ¼ of Section 21, Township 10 North, Range 18 East, in the City of Hartford, Washington County, State of Wisconsin. The site is approximately located at 43° 19' 6.3" N and 88° 21' 59.4" W.

TAXKEY: 36_2102004006

Introduction

This document is the Maintenance Plan for a soil/pavement cover and building barrier at the above-referenced property in accordance with the requirements of s. NR 724.13(2), Wisconsin Administrative Code. The maintenance activities relate to the approximately 365,000-square foot manufacturing facility and paved/landscaped surfaces that are occupying the area over the contaminated soil on-site.

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

- The case file in the DNR Southeast regional office
- BRRTS on the Web (DNR's internet based data base of contaminated sites): http://**dnr.wi.gov/botw/**SetUpBasicSearchForm.do
- GIS Registry PDF file for further information on the nature and extent of contamination: http://dnrmaps.wisconsin.gov/imf/imf.jsp?site=brrts2; and
- The DNR project manager for Washington County.

Description of Contamination

Soil contaminated by petroleum and/or metals is located at a depth of 1-5 feet below ground surface (bgs) at the above-referenced property. The extent of the soil contamination is shown in the attached Exhibit A (Figure 3).

Description of the Soil/Pavement Cover and Building Barrier to be Maintained

The soil/pavement cover and building barrier consists of the new building addition and paved/landscaped surfaces, completed in November 2013.

According to the construction plans, the new building addition measures approximately 100,183 square feet. The addition extends off of the east wall of the original building. PSI understands that the new building is a single-story slab-on-grade structure with no below grade levels. The new finished floor elevation matches that of the existing building at elevation 992.50 feet. Based on existing grades within the building area varying from 986 to 992 feet, cut and fills were on the order of 1± to 6± feet to bring the site to grade.

Additional barriers include the construction of new pavements for a light duty parking lot to the east of the new building addition as well as new heavy duty truck pavements near the northeast corner of the new addition and a rehabilitation of an existing truck driveway connecting Wilson Avenue to the northeast corner of the existing building. Based on the grading plan, final grades for the pavement are at or near previously existing grades. North of the new addition is a grass landscaped area. All landscaped areas located over areas of residual soil contamination were covered with two-feet of clean fill prior to landscaping activities. The soil/pavement cover and building barrier over the residual soil contamination is shown in the attached Exhibit A (Figure 3).

Soil/Pavement Cover and Building Barrier Purpose

The 100,183-square foot new building addition and paved/landscaped surfaces serve as a barrier to prevent direct human contact with residual soil contamination on the Subject Property that might otherwise pose a threat to human health. The new building and paved/landscaped surfaces also act as partial infiltration barriers to minimize future soil-to-groundwater contamination migration that would violate the groundwater standards in Ch. NR 140, WAC. Based on the current and future use of the Subject Property, these barriers should function as intended unless disturbed.

Annual Inspection

The soil/pavement cover and building barrier overlying the contaminated soil and as depicted in Exhibit A will be inspected once a year, normally in the spring after all snow and ice is gone, for deterioration, cracks and other potential problems that can cause additional infiltration into or exposure to underlying soils. The inspections will be performed by the property owner or their designated representative. The inspections will be performed to evaluate damage due to settling, exposure to the weather, wear from traffic, increasing age and other factors. Any area where soils have become or are likely to become exposed and where infiltration from the surface will not be effectively minimized will be documented. A log of the inspections and any repairs will be maintained by the property owner and is included as Exhibit B, Cap Inspection Log. The log will include recommendations for necessary repair of any areas where underlying soils are exposed and where infiltration from the surface will not be effectively minimized. Once repairs are completed, they will be documented in the inspection log. A copy of the inspection log will be kept at the address of the property owner and available for submittal or inspection by Wisconsin Department of Natural Resources (“WDNR”) representatives upon their request.

Maintenance Activities

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

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

The property owner, in order to maintain the integrity of the soil/pavement cover and building barrier, will maintain a copy of this Maintenance Plan on-site and make it available to all interested parties (i.e. on-site employees, contractors, future property owners, etc.) for viewing.

Prohibition of Activities and Notification of DNR Prior to Actions Affecting a Cover or Cap

The following activities are prohibited on any portion of the property where pavement surfaces, a building foundation, soil cover, landscaped cover, engineered cap or other barrier is required as shown on the attached map (Exhibit A), unless prior written approval has been obtained from the Wisconsin Department of Natural Resources: 1) removal of the existing barrier; 2) replacement with another barrier; 3) excavating or grading of the land surface; 4) filling on capped or paved areas; 5) plowing for agricultural cultivation; or 6) construction or placement of a building or other structure.

Amendment or Withdrawal of Maintenance Plan

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

Contact Information
(as of December 2013)

Site Owner:
Hartford Investment Company, LLC
Mr. Gary Wendorff
Partner
105 Steel Craft Drive
Hartford, WI 53027
(262) 673-6770

Site Operator:
Hartford Investment Company, LLC
Mr. Gary Wendorff
Partner
105 Steel Craft Drive
Hartford, WI 53027
(262) 673-6770

Consultant:
Professional Service Industries, Inc.
Ms. Erika Dahlem
Project Manager
W237 N2878 Woodgate Road
Suite 2
Pewaukee, Wisconsin 53072
(262) 347-0898

WDNR:
Wisconsin Department of Natural Resources
Mr. John M. Feeney
Division of Air, Waste and Remediation & Redevelopment
PLYMOUTH SERVICE CENTER
1155 Pilgrim Road
Plymouth WI, 53073
920-892-8756 extension 3023

Exhibit A

LEGEND:

- PAH SOIL CONTAMINATION ABOVE WDNR STANDARDS (1–5' BGS)
- LEAD SOIL CONTAMINATION ABOVE WDNR STANDARDS (1–5' BGS)
- HIGH LEVELS OF LEAD IN SOIL (>1,000 mg/kg) (1–5' BGS)
- CADMIUM SOIL CONTAMINATION ABOVE WDNR STANDARDS (1–5' BGS)

SP-1 ● PHASE 2 ESA SOIL BORING LOCATION

SP-8 / TW-8 ⊕ PHASE 2 ESA SOIL BORING/TEMPORARY MONITORING WELL LOCATION

SP-9 / TW-9 ⊕ SUPPLEMENTAL PHASE 2 ESA SOIL BORING/TEMPORARY MONITORING WELL LOCATION

BGS = BELOW GROUND SURFACE

mg/kg = MILLIGRAMS PER KILOGRAMS

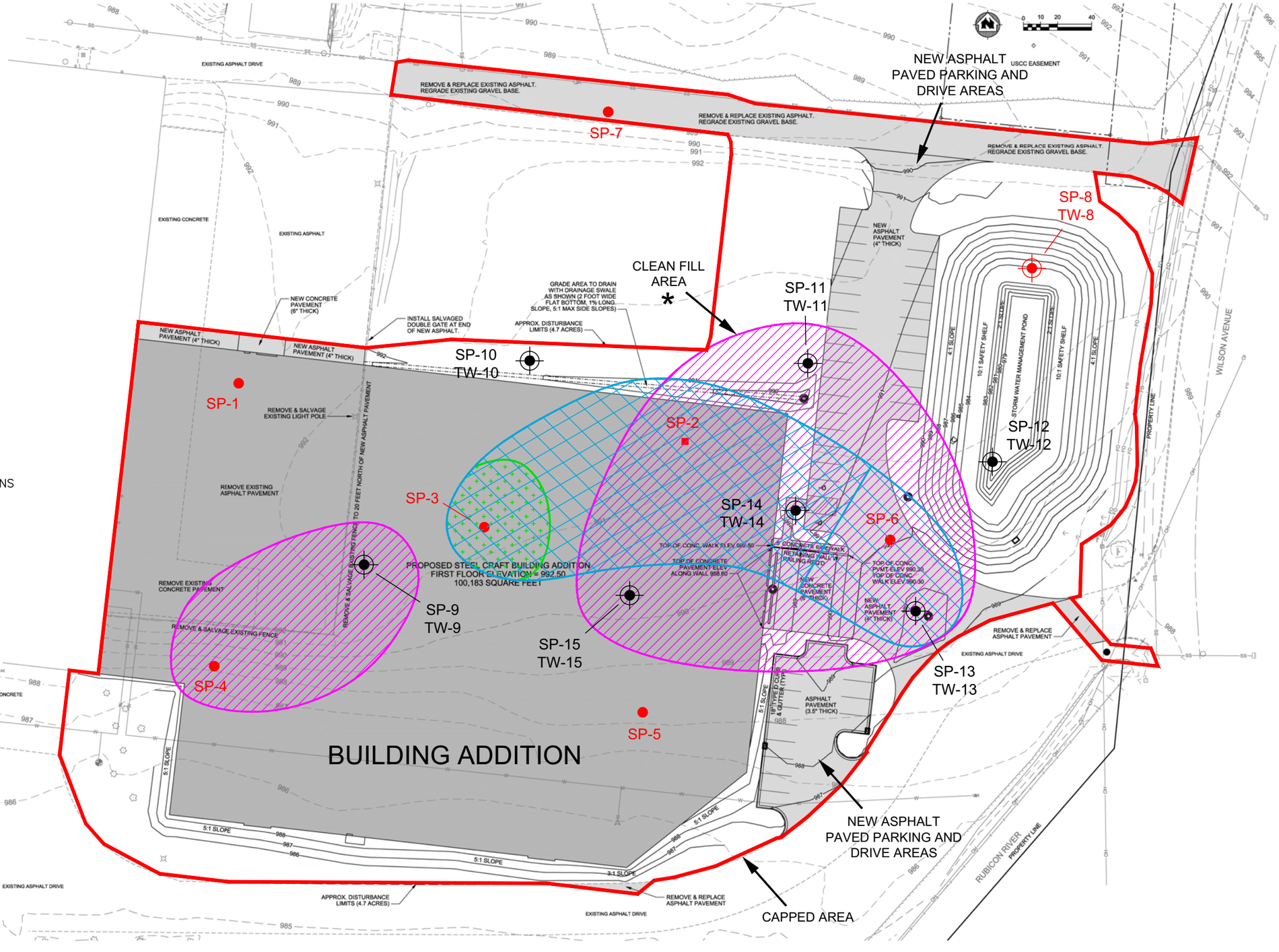
WDNR = WISCONSIN DEPARTMENT OF NATURAL RESOURCES

ESA = ENVIRONMENTAL SITE ASSESSMENT

PAH = POLYNUCLEAR AROMATIC HYDROCARBONS

CAPPED AREA

* CLEAN FILL PLACED 2 FEET DEEP AREAS OF CONTAMINATION NOT COVERED BY BUILDING OR PAVEMENT



ALL LOCATIONS ARE APPROXIMATE

0 60'
GRAPHIC SCALE

psi *Information To Build On*
Engineering • Consulting • Testing

Environmental Services
W237 N2878 Woodgate Road, Suite 2
Pewaukee, Wisconsin 53072
(262) 347-0898 (262) 347-2256 fax

Cap Location Map

Steel Craft Corporation - Building Addition
Hartford Investment LLC
City of Hartford, Washington County, Wisconsin

Checked:	Scale:	Date:	Figure:
M. Dahlem	1" = 60'	Jan 6, 2014	4

Drawn: C. Moran
0054614-1 2014 Fig 4 cap.dwg

Project Number: 0054614

Exhibit B
BARRIER INSPECTION LOG

Inspection Date	Inspector	Condition of Cap	Recommendations	Have Recommendations from previous inspection been implemented?

ATTACHMENT E:
MONITORING WELL INFORMATION

Not applicable, permanent groundwater monitoring wells were not installed on this property.

ATTACHMENT F:
NOTIFICATION TO OWNERS OF IMPACTED PROPERTIES

Not applicable, adjoining and surrounding properties were not impacted.

ATTACHMENT G:
SOURCE LEGAL DOCUMENTS

G.1- Deeds: Source Property Deed Included

G.2- Certified Survey Map: Included

G.3- Verification of Zoning: Included

G.4- Signed Statement: Included

DOC#: 1026082

Recorded
NOV. 06, 2003 AT 12:35PM
SHARON A. MARTIN
REGISTER OF DEEDS
WASHINGTON COUNTY, WI
Fee Amount: $11.00
Fee Exempt 77.25-(2)

Document Number

STATE BAR OF WISCONSIN FORM 3 - 1998

QUIT CLAIM DEED

This Deed, made between the **CITY OF HARTFORD,** Grantor, and **HARTFORD INVESTMENT COMPANY, LLC,** Grantee.

Grantor for and valuable consideration, the receipt and sufficiency of which is hereby acknowledged, quit claims without warranty or representation to Grantee the following described real estate in Washington County, State of Wisconsin:

All of Grantor's interest, if any, in the following real property (the "Property"):

Lots One (1) and Two (2) of CERTIFIED SURVEY MAP NO. 5590, recorded in the Washington County Registry on March 6, 2003 in Volume 40 of Certified Survey Maps, pages 163-167 as Document No. 978423, being a survey of part of Block K of A.M. THOMPSON ADDITION and part of Outlot 266 and part of Outlot 251 of City of Hartford Assessor's Plat; all being located in part of the SE ¼ of the NW ¼, part of the SW ¼ of the NE ¼ and part of the NE ¼ of the SW ¼ of Section 21, Town 10 North, Range 18 East, City of Hartford, Washington County, Wisconsin.

Recording Area

Name and Return Address

Walter Scott Leedom, Esq.
Davis & Kuelthau, s.c.
111 E. Kilbourn Avenue, Suite 1400
Milwaukee, WI 53202-6613

.Part of PT 36-2102-004-001
Parcel Identification Number (PIN)

This ____is not____ homestead property.
~~(is)~~ (is not)

This conveyance is exempt from the Real Estate Transfer Return form and fee pursuant to Sec. 77.25(2) of the Wisconsin Statutes.

Together with all appurtenant rights, title and interests. Subject to municipal and zoning ordinance and agreements entered under them, easements, restrictions, and encumbrance of record and those restrictions set forth on Exhibit A attached hereto and made a part hereof.

Dated this 28 day of October, 2003.

CITY OF HARTFORD

By: Scott Henke

* Scott M. Henke, Mayor

Marjorie C. Savana

* Marjorie Savana, Clerk

* _____

* _____

AUTHENTICATION

Signature(s) Scott M. Henke, Mayor, and Marjorie Savana, Clerk

authenticated this 28 day of October, 2003

Karen M. Christianson

* Karen M. Christianson

TITLE: MEMBER STATE BAR OF WISCONSIN

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

THIS INSTRUMENT WAS DRAFTED BY

Walter Scott Leedom, Esq.
Davis & Kuelthau, s.c.

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

ACKNOWLEDGMENT

STATE OF _____)
) ss.
_____ County.)

Personally came before me this _____ day of _____, _____ the above named

_____

_____

_____

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

_____

* _____

Notary Public, State of _____

My Commission is permanent. (If not, state expiration date: _____, _____.)

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

ALTA/ACSM LAND TITLE SURVEY

LEGAL DESCRIPTION

LOT TWO (2) OF CERTIFIED SURVEY MAP NO. 5590, RECORDED IN THE WASHINGTON COUNTY REGISTRY ON MARCH 6, 2003 IN VOLUME 40 OF CERTIFIED SURVEY MAPS, PAGES 163-167 AS DOCUMENT NO. 978423, BEING A SURVEY OF PART OF BLOCK K OF A.M. THOMPSON ADDITION AND PART OF OUTLOT 266 AND PART OF OUTLOT 251 OF CITY OF HARTFORD ASSESSOR'S PLAT; ALL BEING LOCATED IN PART OF THE SE.1/4 OF THE NW.1/4, PART OF THE SW.1/4 OF THE NE.1/4 AND PART OF THE NE.1/4 OF THE SW.1/4 OF SECTION 21, TOWN 10 NORTH, RANGE 18 EAST, CITY OF HARTFORD, WASHINGTON COUNTY, WISCONSIN, AS CORRECTED BY AFFIDAVIT RECORDED ON OCTOBER 17, 2003 AS DOCUMENT NO. 1023148.

TAX ID NO. 36-2102-004-006
ADDRESS: 105 Steel Craft Drive, Hartford, WI 53027

LOCATION MAP
(CITY OF HARTFORD, WI)

SURVEYOR'S CERTIFICATION

This survey is made for the benefit of and is certified to: Associated Bank N.A., AND/OR THEIR SUCCESSORS AND ASSIGNS, AS THEIR INTERESTS MAY APPEAR, Hartford Investment Company, LLC, a Wisconsin limited liability company and Fidelity National Title Insurance Company.

I, Michael J. Laue, a Registered Land Surveyor in the State of Wisconsin, do hereby certify to the aforesaid parties, their successors and assigns, as of the date set forth hereon, that I have made a careful survey of the tract of land described and shown herein.

I further certify that:

1. This is to certify that this map or plat and the survey on which it is based were made in accordance with the 2011 Minimum Standard Detail Requirements for ALTA/ACSM Land Title Surveys, jointly established and adopted by ALTA and NSPS, and includes items 1, 2, 3, 4, 6(a), 6(b), 7(a), 7(c), 8, 9, 11(a), 13, 15, 16, 17, 18, 20(a) and 21 as provided by client.

2. The survey correctly shows the location of all buildings, structures and other improvements situated within the limits of the legal descriptions taken from Schedule "A" of Title Commitment bearing the Title Policy Number F-309623, dated May 9, 2013 at 8:00AM.

3. Except as shown, all utilities serving the Property enter through adjoining public streets and/or easements of record; that, except as shown, there are no visible easements, or right-of-way across said Property; that the Property described hereon is the same as the Property described in Title Policy Number F-309623, dated May 9, 2013 at 8:00AM, and all easements, covenants and restrictions referenced in said title commitment, or easements of which the undersigned has been advised or has knowledge, have been plotted or otherwise noted as to their effect on the subject Property.

4. Except as shown, there are no encroachments onto adjoining property, streets or alleys by any buildings, structures or other improvements situated on adjoining property across property lines onto said Property or across zoning restrictions lines in effect as of the date of this survey.

5. Said described Property is located within an area having a Flood Zone Designation "A2, B and C" on FEMA Flood Insurance Rate Map No. 5504730001B with a map affective date of December 4, 1984, in Washington County, Wisconsin, which is the current Flood Insurance Rate Map for the community in which said Property is situated and the Property is not located in an area designated as a special flood hazard area by the U.S. Department of Housing and Urban Development. (NOTE: Locations shown on map were scaled from FEMA Flood Insurance Rate Map No. 5504730001B)

6. The Property has direct physical access and means of ingress and egress to Steel Craft Drive and Wilson Avenue. Being a public street or highway on which the Property abuts or has easements covering.

Michael J. Laue

Registration No. S-1435
In the State of Wisconsin
Date of Field Work: May 22 & 30, 2013
Date of Survey: June 4, 2013
Revised :

WISCONSIN
MICHAEL J. LAUE
S-1435
BEAVER DAM, WISCONSIN
LAND SURVEYOR

SURVEYOR'S NOTES

The legal description and exceptions were taken from a Title Policy prepared by Fidelity National Title Insurance Company bearing a Commitment No. of F-309623 with an effective date of May 9, 2013 at 8:00 a.m. This title policy was used as the sole source of record encumbrances and MSA Professional Services, Inc. assumes no liability for errors or ommissions therein.

ALL FIELD MEASUREMENTS MATCHED RECORD DIMENSIONS WITHIN THE PRECISION REQUIREMENTS OF ALTA/ACSM SPECIFICATIONS UNLESS OTHERWISE SHOWN.

THIS SITE IS NOT BEING USED AS A SOLID WASTE DUMP, SUMP OR SANITARY LANDFILL.

173 REGULAR PARKING STALLS AND 5 HANDICAP PARKING STALLS.

LOT APPEARS TO BE SERVED BY UTILITIES. UTILITIES SHOWN HEREON ARE BASED ON OBSERVED EVIDENCE ONLY. MSA PROFESSIONAL SERVICES, INC. IS NOT LIABLE FOR ERRORS OR OMISSIONS IN THE LOCATIONS. THE LOCATIONS SHOWN ARE FOR INFORMATIONAL PURPOSES ONLY - DIGGER'S HOTLINE IS TO BE NOTIFIED AT LEAST 72 HOURS PRIOR TO ANY EXCAVATION.

THIS PROPERTY IS ZONED M-3 GENERAL INDUSTRIAL.

PER ITEMS 16 AND 17 OF THE TABLE "A" REQUIREMENTS: AT THE TIME OF THIS SURVEY THERE WAS NO EARTH MOVING WORK, BUILDING CONSTRUCTION OR BUILDING ADDITIONS. NO CHANGES IN STREET RIGHT-OF-WAY LINES.

SOME UNDERGROUND UTILITIES ARE SHOWN FROM PREVIOUS WORK PERFORMED BY MSA PROFESSIONAL SERVICES.

SURVEYOR'S NOTES

Commitment No. F-309623
[EXCEPTIONS "A" THROUGH "O" AND "Q" AND "T" THROUGH "X" AND BB AND CC ARE GENERAL EXCEPTIONS BY THE TITLE COMPANY.]

(P.) Restrictions, Conditions and Covenants contained in Warranty Deed executed by B.M. Kissel, d/k/a Hartford Industries Company and whose full name is Blanche M. Kissel TO Washams Oil Company dated June 29, 1935, and recorded August 17, 1935 in Volume 112 of Deeds, page 249, as Document No. 158985.

(R.) Utility Easement granted to Wisconsin Electric Power Company recorded September 22, 1972 in volume 528 of Records, page 132, as Document No. 336061.

(S.) Easement granted to City of Hartford dated December 17, 1935 and recorded December 21 1935 at 10:15 A.M., as Document No. 159940.

(Y.) Covenants, conditions, restrictions, limitations and easements contained in Deed, dated August 19, 1996 and recorded September 20, 1996, In Volume 1632 of Records, page 567, as Document No. 728315 .

(Z.) Easement Agreement executed by and between the City of Hartford and Hartford Investment Company, LLC, recorded January 12, 2004 as Document No. 1032915.

(AA.) Rights of United States Cellular Operating Company LLC, a Delaware limited liability company, as lessee under Lease entered into by and between said Lessee and Hartford Investment Company, LLC, a Wisconsin limited liability company, dated February 21, 2013, a Memorandum of which was recorded May 8, 2013 as Document No. 1335886, including any rights of said Lessee as owner of any tenants fixtures located on the demised premises and any liens on such tenants fixtures.

[ ] - SURVEYORS COMMENTS

◯ - PLOTTABLE EXCEPTIONS

LEGEND

- BOUNDARY LINE
- CENTERLINE
- EXISTING EASEMENT
- SECTION LINE
- ABUTTING/RW LINE
- SETBACK LINE
- E — UNDERGROUND ELECTRIC
- T — UNDERGROUND TELEPHONE
- OH — OVERHEAD ELECTRIC
- SAN — SANITARY SEWER
- SS — STORM SEWER
- W — WATER LINE
- G — GAS LINE
- TV — UNDERGROUND TV
- X — FENCE LINE
- GAS METER, FIELD VERIFY
- ELECTRIC METER, FIELD VERIFY
- TELEPHONE PEDESTAL, FIELD VERIFY
- ELECTRICAL PEDESTAL, FIELD VERIFY
- HANDICAP PARKING
- POWER POLE
- ROAD SIGN
- WATER VALVE
- HYDRANT
- LIGHT POLE
- GUARD POST
- CATCH BASIN
- SET 3/4" (O.D.) BY 18" IRON ROD-1.68 LBS./FT.
- FND. B.C.A.M.
- SET MAG NAIL
- FOUND REBAR
- FOUND IRON PIPE
- BRUSH OR SHRUB
- ELECTRIC TRANSFORMER
- CURB INLET
- STORM MANHOLE
- SANITARY MANHOLE
- WATER MANHOLE
- MISC. MANHOLE
- MAIL BOX
- AC UNITS
- GROUND LIGHT
- FLAG POLE
- DECIDUOUS TREE

PER CITY OF HARTFORD MUNICIPAL CODE 13.0322
M-3 GENERAL INDUSTRIAL DISTRICT:

e) Building Height and Area:

1) No building, part of a building or structure shall exceed 35 feet in height.

2) The sum total of the first floor area of the principal building and all accessory buildings shall not exceed 50 percent of of the lot area.

f) Setbacks and Yards:

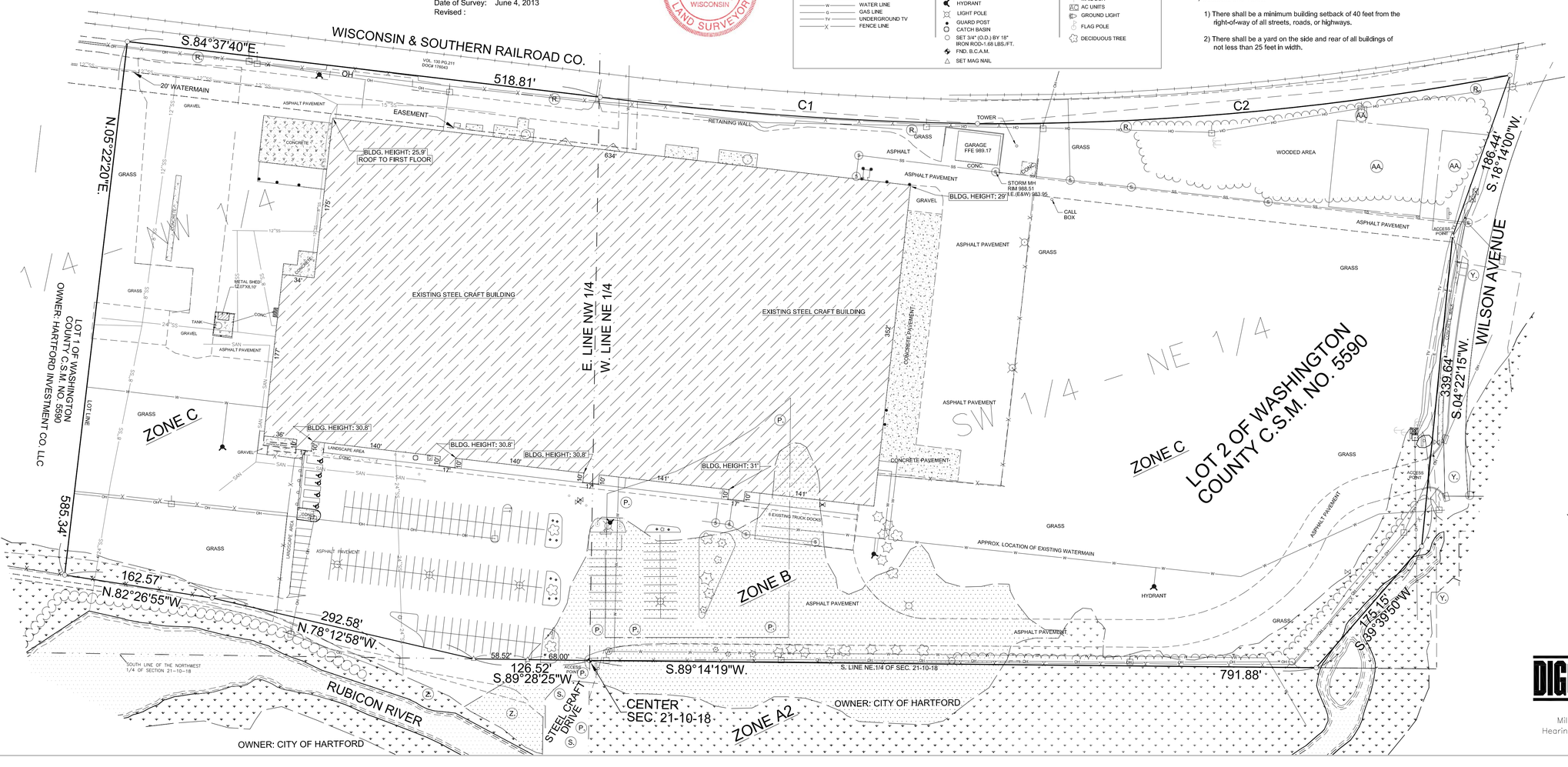
1) There shall be a minimum building setback of 40 feet from the right-of-way of all streets, roads, or highways.

2) There shall be a yard on the side and rear of all buildings of not less than 25 feet in width.

CURVE TABLE

CURVE	DELTA	CHORD DIRECTION	RADIUS	ARC LEN	CHORD LEN
C1	06°16'59"	S87°18'43"E	3760.58	412.39	412.18
C2	11°08'28"	N83°28'08"E	3001.01	583.54	582.62

LOT AREA: 881,691± SQ.FT. / 20.241± ACRES



BEARINGS REFERENCED TO THE S. LINE OF THE NE.1/4 OF SECTION 21, TOWN 10 NORTH, RANGE 18 EAST, CITY OF HARTFORD, WASHINGTON COUNTY, WISCONSIN, WHICH BEARS S.89°14'19"W.

0 60' 120'

DIGGERS HOTLINE
Toll Free (800) 242-8511
Milwaukee Area (414) 259-1181
Hearing Impaired TDD (800) 542-2289
www.DiggersHotline.com

TRANSPORTATION • MUNICIPAL
DEVELOPMENT • ENVIRONMENTAL
201 Corporate Drive, Beaver Dam, WI 53916
920-887-4242 1-800-552-6330 Fax: 920-887-4250
Web Address: www.msa-ps.com

MSA PROFESSIONAL SERVICES

NO.	DATE	REVISION	BY

PROJECT NO.: 04940002
DATE:
SCALE: 1" = 30'
F.B.:
DRAWN BY: D. L. L.
CHECKED BY: M. J. L.
FILE: 04940002.ALTA
PLOT DATE: 06-04-2013
PLOT TIME:

ALTA/ACSM LAND TITLE SURVEY
HARTFORD INVESTMENT LLC
105 STEEL CRAFT DRIVE
CITY OF HARTFORD, WASHINGTON COUNTY, WI

FILE NO.
R.04940002.0

SHEET
1 OF 1

— City of Hartford —

CITY HALL
109 NORTH MAIN STREET
HARTFORD, WI 53027-1591
www.ci.hartford.wi.us

July 25, 2013

Zach Moureau
Project Scientist
Environmental Services
Professional Service Industries, Inc. (PSI)
W237 N2878 Woodgate Rd, Suite 2
Pewaukee, WI 53072

Dear Mr. Moureau:

Per your request, this letter is verification that the property located at 105 Steelcraft Drive, tax key number 36-2104-004-006, is zoned M-3 General Industrial District.

Sincerely,

Char Smelter
Planning and Zoning

STATEMENT

I believe the attached legal description accurately describes the correct contaminated property.

Signature

Gene Wendorf

Printed Name

Harford Investment Co. Inc. Vice President

Company and Position