State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
2984 Shawano Avenue
Green Bay WI 54313-6727

Tony Evers, Governor
Preston D. Cole, Secretary
Telephone 608-266-2621
Toll Free 1-888-936-7463
TTY Access via relay - 711

July 12, 2019

MR. KEN KELLER
309 OGDEN STREET
MARINETTE, WI 54143

KEEP THIS DOCUMENT WITH YOUR PROPERTY RECORDS

SUBJECT: Final Case Closure with Continuing Obligations
Keller Property, 102 Water St, Marinette WI
DNR BRRTS Activity #: 02-38-560993
PECFA #: 54143-9999-02-A

Dear Mr. Keller:

The Department of Natural Resources (DNR) considers the Keller Property closed, with continuing obligations. The closure applies to Volatile Organic Compounds (VOCs), Polycyclic Aromatic Hydrocarbons (PAHs) and/or lead in soil and/or groundwater. No further investigation or remediation is required at this time. However, you, future property owners, and occupants of the property must comply with the continuing obligations as explained in the conditions of closure in this letter. Please read over this letter closely to ensure that you comply with all conditions and other on-going requirements. Provide this letter and any attachments listed at the end of this letter to anyone who purchases, rents or leases this property from you. Certain continuing obligations also apply to affected property owners or rights-of-way holders. These are identified within each continuing obligation.

This final closure decision is based on the correspondence and data provided and is issued under chs. NR 726 and 727, Wis. Adm. Code. The Northeast Region (NER) Closure Committee reviewed the request for closure on December 6, 2018. The DNR Closure Committee reviewed this environmental remediation case for compliance with state laws and standards to maintain consistency in the closure of these cases. A request for remaining actions needed was issued by the DNR to your consultant on February 22, 2019, and documentation that the conditions in that letter were met, was received on July 12, 2019.

A bulk petroleum storage facility operated on the property from at least 1895 until approximately 1980. The property was then used by a trucking company until Keller Construction purchased it in 1984. Petroleum impacted soil remains in exceedance of the groundwater pathway Residual Contaminant Levels (RCLs) and direct contact RCLs on the source property. A gravel cap is in place to provide protection from direct contact. Soil contamination also extends onto the Canadian National Railway property to the north. Petroleum impacts in groundwater above the NR140 Enforcement Standards (ES) are present and contained within the source property.

The conditions of closure and continuing obligations required were based on the property being used for commercial purposes.

Continuing Obligations

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

- Groundwater contamination is present at or above ch. NR 140, Wis. Adm. Code enforcement standards.
- Residual soil contamination exists that must be properly managed should it be excavated or removed.
- The existing gravel surface cover must be maintained over contaminated soil and the DNR must be notified and approve any changes to this barrier.
- Remaining contamination could result in vapor intrusion if future construction activities occur. Future construction includes expansion or partial removal of current buildings as well as construction of new buildings. Vapor control technologies will be required for occupied buildings, unless the property owner assesses the potential for vapor intrusion, and the DNR agrees that vapor control technologies are not needed.

The DNR fact sheet "Continuing Obligations for Environmental Protection," RR-819, helps to explain a property owner's responsibility for continuing obligations on their property. The fact sheet may be obtained online at dnr.wi.gov and search "RR-819".

DNR Database

This site will be included on the Bureau for Remediation and Redevelopment Tracking System (BRRTS) on the Web (BOTW) online at dnr.wi.gov and search "BOTW", to provide public notice of residual contamination and of any continuing obligations. The site can also be viewed on the Remediation and Redevelopment Sites Map (RRSM), a map view, at dnr.wi.gov and search "RRSM".

The DNR's approval prior to well construction or reconstruction is required in accordance with 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 dnr.wi.gov and search "3300-254".

All site information is also on file at the Northeast Regional DNR office, at 2984 Shawano Avenue, Green Bay, WI 54313. This letter and information that was submitted with your closure request application, including any maintenance plan and maps, can be found as a Portable Document Format (PDF) in BOTW.

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 the gravel cover is required, as shown on the attached map (Location Map, Figure D.2, dated January 22, 2015) unless prior written approval has been obtained from the DNR:

- removal of the existing barrier or cover;
- replacement with another barrier or cover;
- excavating or grading of the land surface;
- filling on covered or paved areas;
- plowing for agricultural cultivation;

- construction or placement of a building or other structure; and
- changing the use or occupancy of the property to a residential exposure setting, which may include certain uses, such as single or multiple family residences, a school, day care, senior center, hospital, or similar residential exposure settings.

Closure Conditions

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

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

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

Residual Groundwater Contamination (ch. NR 140, 812, Wis. Adm. Code)
Groundwater contamination greater than enforcement standards is present on this contaminated property, as shown on the attached map (Figure B.3.b; Groundwater Isoconcentration (1/8/18); April 13, 2017). If you intend to construct a new well, or reconstruct an existing well, you'll need prior DNR approval.

Residual Soil Contamination (ch. NR 718, chs. 500 to 536, Wis. Adm. Code or ch. 289, Wis. Stats.)
Soil contamination remains as indicated on the attached map (Figure B.2.b; Residual Soil Contamination; April 13, 2017). If soil in the specific locations described above is excavated in the future, the property owner or right-of-way holder at the time of excavation must sample and analyze the excavated soil to determine if contamination remains. If sampling confirms that contamination is present, the property owner or right-of-way holder at the time of excavation will need to determine whether the material is considered solid or hazardous waste and ensure that any storage, treatment or disposal is in compliance with applicable standards and rules. Contaminated soil may be managed in accordance with ch. NR 718, Wis. Adm. Code, with prior DNR approval. This continuing obligation also applies to the Canadian National Railroad property to the north of the source property.

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 existing gravel surface cover that exists in the location shown on the attached map (Figure D.2; Location Map; January 22, 2015) shall be maintained in compliance with the attached maintenance plan, dated May 1, 2018, in order to prevent direct contact with residual soil contamination that might otherwise pose a threat to human health.

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

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

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

Vapor Mitigation or Evaluation (s. 292.12 (2), Wis. Stats., s. NR 726.15, s. NR 727.07, Wis. Adm. Code)
Vapor intrusion is the movement of vapors coming from volatile chemicals in the soil or groundwater, into buildings where people may breathe air contaminated by the vapors. Vapor mitigation systems are used to interrupt the pathway, thereby reducing or preventing vapors from moving into the building.

Future Concern: Volatile petroleum compounds remain in soil and groundwater as shown on the attached maps (Figure B.2.b; Residual Soil Contamination; April 13, 2017 and Figure B.3.b; Groundwater Isoconcentration (1/8/18); April 13, 2017), at levels that may be of concern for vapor intrusion in the future, depending on construction and occupancy of a building. Therefore, before a building is constructed and/or an existing building is modified, the property owner must notify the DNR at least 45 days before the change. Vapor control technologies are required for construction of occupied buildings unless the property owner assesses the vapor pathway and the DNR agrees that vapor control technologies are not needed.

Other Closure Information

General Wastewater Permits for Construction Related Dewatering Activities

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

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

Chapter NR 140, Wis. Adm. Code Exemption

Recent groundwater monitoring data at this site indicates that for Benzo(b)Fluoranthene at monitoring well TW-24 (off-site property owned by Marinette Housing Authority and located West of the source property (parcel number 251-04691.000), and Benzo(a)pyrene, Benzo(b)fluoranthene and Chrysene at

MW-2, MW-5 and MW-6 found within the source property, 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. Exemption granted as PAHs have been addressed based on the available groundwater monitoring. Therefore, pursuant to s. NR 140.28, Wis. Adm. Code, an exemption to the PAL is granted for Benzo(b)Fluoranthene at monitoring well TW-24 and for Benzo(a)pyrene, Benzo(b)fluoranthene and Chrysene at monitoring wells MW-2, MW-5 and MW-6. Please keep this letter, because it serves as your exemption.

PECFA Reimbursement

Section 101.143, Wis. Stats., requires that Petroleum Environmental Cleanup Fund Award (PECFA) claimants seeking reimbursement of interest costs, for sites with petroleum contamination, submit a final reimbursement claim within 120 days after they receive a closure letter on their site. For claims not received within 120 days of the date of this letter, interest costs after 60 days of the date of this letter will not be eligible for PECFA reimbursement. If there is equipment purchased with PECFA funds remaining at the site, contact the DNR Project Manager to determine the method for salvaging the equipment.

Per Wisconsin Act 55 (2015 State budget), a claim for PECFA reimbursement must be submitted within 180 days of incurring costs (i.e., completing a task). If your final PECFA claim is not submitted within 180 days of incurring the costs, the costs will not be eligible for PECFA reimbursement.

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, 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 Tom Verstegen at (920) 424-0025, or at Thomas.Verstegen@wisconsin.gov.

Sincerely,

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

Attachments:

- Figure B.2.b; Residual Soil Contamination; April 13, 2017
- Figure B.3.b; Groundwater Isoconcentration (1/8/18); April 13, 2017
- Cap Maintenance Plan; Attachment D; May 1, 2018

ec: Ron Anderson, METCO (rona@metcohq.com)

cc: Marinette Housing Authority, (owner of property with TW24 - parcel number 251-04691.000)
1520 Ludington Street, Marinette, WI 54143

B.2.b RESIDUAL SOIL CONTAMINATION

KELLER PROPERTY

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

MARINETTE, WISCONSIN

DRAWN BY: ED DATE: 1/22/2015
MODIFIED BY: MH DATE: 4/13/2017

NOTE: INFORMATION BASED ON AVAILABLE DATA ACTUAL CONDITIONS MAY DIFFER

CITY OF MARINETTE PROPERTY

SLOPE DOWN TO MARSH

ESTIMATED EXTENT OF PETROLEUM CONTAMINATION IN UNSATURATED SOIL EXCEEDING NR720 NON-INDUSTRIAL DIRECT CONTACT RCLS

FORMER RAILROAD TRACKS - CANADIAN NATIONAL PROPERTY

MARSH

OLD FENCE LINE

GRAVEL

MW-3 MW-4 MW-5 MW-1 MW-2 MW-6

G-1 G-2 G-3 G-4 G-6 G-7 G-8 G-9 G-15 G-16 G-17 G-18 G-19 G-20 G-26

A. F B. F A. F B. F

SB1/TW1 SB2 SB3/TW2 SB8

CONCRETE WALL

FMR PLATFORM

FMR LOADING PLAT-FORM

C D E F G H

AREA A: 190' x 40' x 1'

CONCRETE

WAREHOUSE 102 WATER STREET

OVERHANG

AREA B: 117' x 70' x 1'

ELEVATED LOADING DOCK

GRAVEL/GRASS

VACANT WOODED LOT - MARINETTE HOUSING AUTHORITY

FENCE

CRUSHED ROCK

CELL TOWER

ESTIMATED EXTENT OF PETROLEUM CONTAMINATION IN UNSATURATED SOIL EXCEEDING NR720 GW RCLS

SAND

ELECTRIC PANEL

ESTIMATED EXTENT OF PETROLEUM CONTAMINATION IN UNSATURATED SOIL EXCEEDING NR720 INDUSTRIAL DIRECT CONTACT RCLS

VACATED STREET

RESIDENTIAL

GRASS

WATER STREET

IST ST

RESIDENTIAL

- WATER LINE
- SANITARY SEWER LINE
- STORM SEWER LINE
- NATURAL GAS LINE
- BURIED ELECTRIC LINE
- OVERHEAD UTILITIES
- TELEPHONE/CABLE LINE
- PROPERTY LINE
- SEWER MANHOLE
- STORM DRAIN
- PHASE 2 ESA SOIL BORING LOCATION
- GEOPROBE BORING LOCATION
- MONITORING WELL LOCATION
- TEMPORARY WELL LOCATION

SCALE: 1 INCH = 30 FEET
0 15 30

KEY TO FORMER ASTS
A = 18,000-GAL GASOLINE (1921 SANBORN MAP)
B = 18,000-GAL KEROSENE (1921 SANBORN MAP)
C = 200,000-GAL GASOLINE (1921 AND 1952 SANBORN MAP)
D = 6,000-GAL LUBRICATING OIL (1921 AND 1935 SANBORN MAP)
E = UNKNOWN CONTENTS (1969 AERIAL PHOTO AND 1975 TAX ASSESSORS RECORDS)
F = 18,000-GAL GASOLINE TANK (1952 SANBORN MAP)
G = PUMP HOUSE (1952 SANBORN MAP)
H = UNIDENTIFIED STRUCTURE/ POSSIBLE LOADING RACK (1952 SANBORN MAP)

- LOCATION OF GRAVEL CAP

B.3.b GROUNDWATER ISOCONCENTRATION (1/8/18)

KELLER PROPERTY

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

MARINETTE, WISCONSIN
DRAWN BY: ED DATE: 1/22/2015
MODIFIED BY: MH DATE: 4/13/2017

4 of 5

NOTE: INFORMATION BASED ON AVAILABLE DATA ACTUAL CONDITIONS MAY DIFFER

CITY OF MARINETTE PROPERTY

SLOPE DOWN TO MARSH

FORMER RAILROAD TRACKS - CANADIAN NATIONAL PROPERTY

PAL

G-6 OLD FENCE LINE

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

AREA A: 190' x 40' x 1'

AREA B: 117' x 70' x 1'

ES

MARSH

GRAVEL

A. F

B. F

C

D

E

F

G

H

CONCRETE WALL

FMR PLATFORM

FMR LOADING PLATFORM

SB1/TW1

SB2

SB3/TW2

SB5/TW7

MW-1

MW-2

MW-3

MW-4

MW-5

MW-6

G-1

G-2

G-3

G-4

G-5

G-7

G-8

G-9

G-10

G-11

G-12

G-13

G-14

G-15

G-16

G-17

G-18

G-19

G-20

G-21

G-22

G-23

G-24/TW-24

G-25

G-26

G-27

SB4

SB6

SB7/TW4

SB8

CONCRETE

WAREHOUSE 102 WATER STREET

OVERHANG

ELEVATED LOADING DOCK

OLD FENCE LINE

GRAVEL/GRASS

VACATED STREET

RESIDENTIAL

VACANT WOODED LOT - MARINETTE HOUSING AUTHORITY

FENCE

CRUSHED ROCK

CELL TOWER

SAND

FENCE

ELECTRIC PANEL

GRASS

WATER STREET

1ST ST

RESIDENTIAL

- WATER LINE
- SANITARY SEWER LINE
- STORM SEWER LINE
- NATURAL GAS LINE
- BURIED ELECTRIC LINE
- OVERHEAD UTILITIES
- TELEPHONE/CABLE LINE
- PROPERTY LINE
- SEWER MANHOLE
- STORM DRAIN
- PHASE 2 ESA SOIL BORING LOCATION
- GEOPROBE BORING LOCATION
- MONITORING WELL LOCATION
- TEMPORARY WELL LOCATION

SCALE: 1 INCH = 30 FEET
0 15 30

KEY TO FORMER ASTS
A = 18,000-GAL GASOLINE (1921 SANBORN MAP)
B = 18,000-GAL KEROSENE (1921 SANBORN MAP)
C = 200,000-GAL GASOLINE (1921 AND 1952 SANBORN MAP)
D = 6,000-GAL LUBRICATING OIL (1921 AND 1935 SANBORN MAP)
E = UNKNOWN CONTENTS (1969 AERIAL PHOTO AND 1975 TAX ASSESSORS RECORDS)
F = 18,000-GAL GASOLINE TANK (1952 SANBORN MAP)
G = PUMP HOUSE (1952 SANBORN MAP)
H = UNIDENTIFIED STRUCTURE/ POSSIBLE LOADING RACK (1952 SANBORN MAP)

- LOCATION OF GRAVEL CAP

D.1 Description of Maintenance Action(s)

CAP MAINTENANCE PLAN

May 1, 2018

Property Located at:
102 Water Street
Marinette, WI 54143

WDNR BRRTS# 02-38-560993

TAX KEY# 251-04692-000

Introduction

This document is the Maintenance Plan for a gravel cap 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 existing cap occupying the area over the contaminated groundwater plume or soil on-site.

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

- The case file in the DNR Northeast 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 and
- The DNR project manager for Marinette County.

Description of Contamination

Soil contaminated by Petroleum Volatile Organic Compounds (PVOCs) and Polynuclear Aromatic Hydrocarbons (PAHs) is located at a depth of 0-4 feet below ground surface (bgs) in the area of the former AST systems. The extent of soil and groundwater contamination is shown on Attachment D.2.

Description of the Cap to be maintained

The Cap consists of gravel (1 foot thick) and exists in the area of the former AST systems to the west and north of the on-site building, as shown on Attachment D.2.

Cover Barrier Purpose

The gravel cap over the contaminated soil and groundwater serves as a barrier to prevent direct human contact with residual soil contamination that might otherwise pose a threat to human health. Based on the current and future use of the property, the barrier should function as intended unless disturbed.

Annual Inspection

The gravel cap overlying the contaminated soil and groundwater and as depicted in Attachment D.2 will be inspected once a year, normally in the spring after all snow and ice is gone, for deterioration, cracks and other potential problems that can cause exposure to underlying soils or additional infiltration through asphalt or concrete. 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 Form 4400-305 Continuing Obligations and Maintenance Log. The log will include recommendations for necessary repair of any areas where underlying soils are exposed and where infiltration from the surface will not be effectively minimized. Once repairs are completed, they will be documented in the inspection log. A copy of the 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.

Note: The WDNR may, in some instances, require in the case closure letter that the inspection log be submitted at least annually after every inspection. If the case closure letter requires that, then a copy of the inspection log must be submitted to the WDNR at least annually after every inspection.

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

The property owner, in order to maintain the integrity of the gravel cap, 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 the gravel cap is required as shown on the attached map, 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.

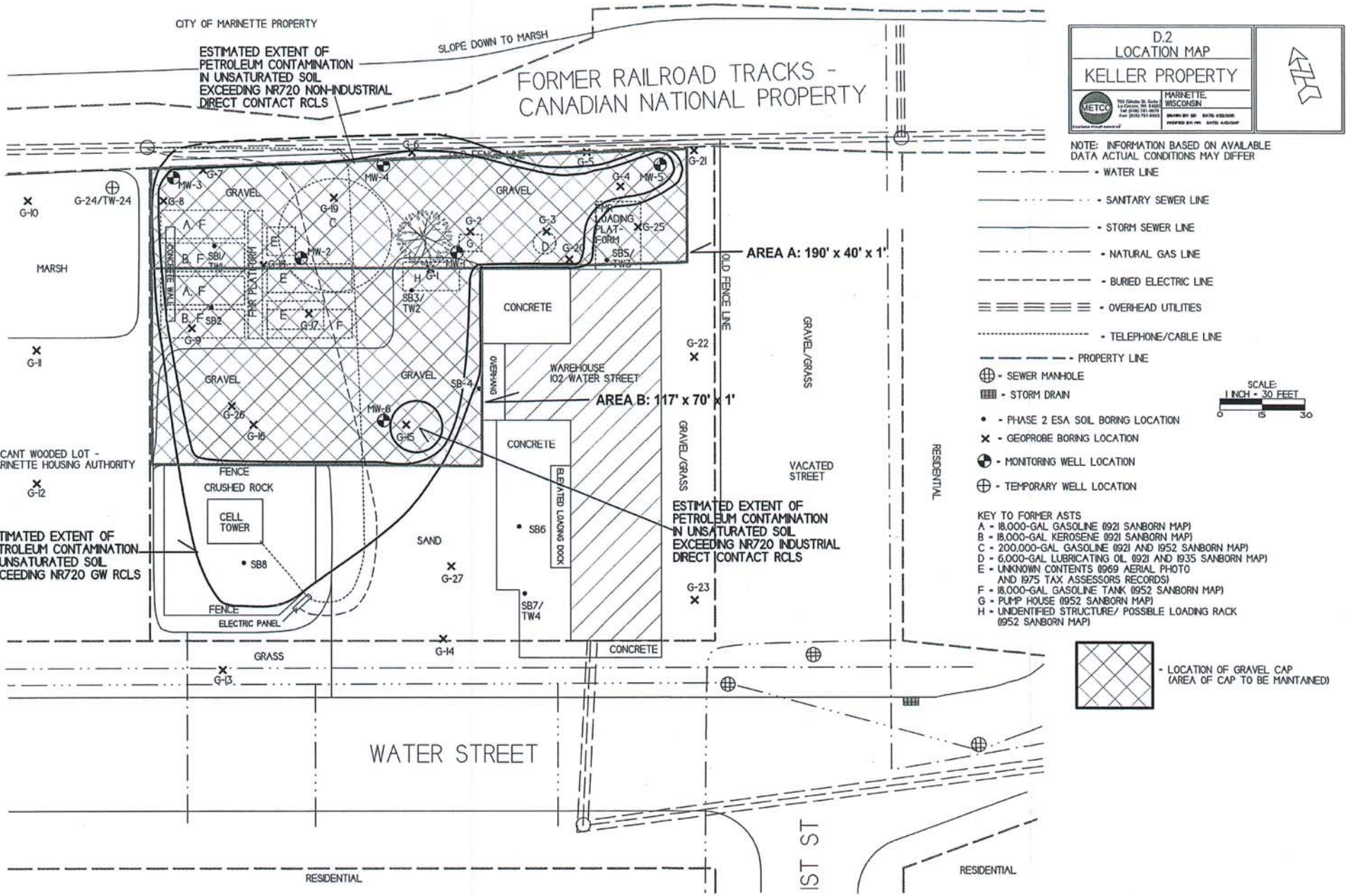
Contact Information
May 2018

Current Site Owner and Operator:
Ken Keller
309 Ogden Street
Marinette, WI 54143

Signature: _____
(DNR may request signature of affected property owners, on a case-by-case basis)

Consultant:
METCO
Ron Anderson
709 Gillette Street, Suite 3
La Crosse, WI 54603
(608) 781-8879

WDNR:
Tom Verstegen
625 E. County Rd Y
Oshkosh, WI 54901
(920) 424-0025


CITY OF MARINETTE PROPERTY
SLOPE DOWN TO MARSH
ESTIMATED EXTENT OF PETROLEUM CONTAMINATION IN UNSATURATED SOIL EXCEEDING NR720 NON-INDUSTRIAL DIRECT CONTACT RCLS
FORMER RAILROAD TRACKS - CANADIAN NATIONAL PROPERTY
D.2
LOCATION MAP
KELLER PROPERTY
METCO
MARINETTE, WISCONSIN
NOTE: INFORMATION BASED ON AVAILABLE DATA ACTUAL CONDITIONS MAY DIFFER
- WATER LINE
- SANITARY SEWER LINE
- STORM SEWER LINE
- NATURAL GAS LINE
- BURIED ELECTRIC LINE
- OVERHEAD UTILITIES
- TELEPHONE/CABLE LINE
- PROPERTY LINE
- SEWER MANHOLE
- STORM DRAIN
SCALE: 1 INCH = 30 FEET
0 15 30
- PHASE 2 ESA SOIL BORING LOCATION
- GEOPROBE BORING LOCATION
- MONITORING WELL LOCATION
- TEMPORARY WELL LOCATION
KEY TO FORMER ASTS
A - 18,000-GAL GASOLINE (1921 SANBORN MAP)
B - 18,000-GAL KEROSENE (1921 SANBORN MAP)
C - 200,000-GAL GASOLINE (1921 AND 1952 SANBORN MAP)
D - 6,000-GAL LUBRICATING OIL (1921 AND 1935 SANBORN MAP)
E - UNKNOWN CONTENTS (1969 AERIAL PHOTO AND 1975 TAX ASSESSORS RECORDS)
F - 18,000-GAL GASOLINE TANK (1952 SANBORN MAP)
G - PUMP HOUSE (1952 SANBORN MAP)
H - UNIDENTIFIED STRUCTURE/ POSSIBLE LOADING RACK (1952 SANBORN MAP)
- LOCATION OF GRAVEL CAP (AREA OF CAP TO BE MAINTAINED)
AREA A: 190' x 40' x 1'
AREA B: 117' x 70' x 1'
ESTIMATED EXTENT OF PETROLEUM CONTAMINATION IN UNSATURATED SOIL EXCEEDING NR720 GW RCLS
ESTIMATED EXTENT OF PETROLEUM CONTAMINATION IN UNSATURATED SOIL EXCEEDING NR720 INDUSTRIAL DIRECT CONTACT RCLS
WAREHOUSE 102 WATER STREET
CONCRETE
GRAVEL
GRAVEL/GRASS
MARSH
VACANT WOODED LOT - MARINETTE HOUSING AUTHORITY
FENCE
CRUSHED ROCK
CELL TOWER
SAND
GRASS
VACATED STREET
RESIDENTIAL
WATER STREET
1ST ST
OLD FENCE LINE
OVERHANG
ELEVATED LOADING DOCK
CONCRETE WALL
FIRE PLATFORM
TWR LOADING PLAT-FORM
ELECTRIC PANEL
G-1 G-2 G-3 G-4 G-5 G-6 G-7 G-8 G-9 G-10 G-11 G-12 G-13 G-14 G-15 G-16 G-17 G-18 G-19 G-20 G-21 G-22 G-23 G-24/TW-24 G-25 G-26 G-27
MW-1 MW-2 MW-3 MW-4 MW-5 MW-6
SB1/TW1 SB2 SB3/TW2 SB4 SB5/TW3 SB6 SB7/TW4 SB8

{Click to Add/Edit Image} Date added: 05/01/2018

Title: Photo #1: Area of cap to be maintained (looking east)

{Click to Add/Edit Image} Date added: 05/01/2018

Title: Photo #1: Area of cap to be maintained (looking north)

{Click to Add/Edit Image} Date added: 05/01/2018

Title: Photo #1: Area of cap to be maintained (looking northwest)

{Click to Add/Edit Image} Date added: 05/01/2018

Title: Photo #1: Area of cap to be maintained (looking southeast)

D.3 photographs

State of Wisconsin
Department of Natural Resources
dnr.wi.gov

Continuing Obligations Inspection and Maintenance Log

Form 4400-305 (2/14)
Page 1 of 2

D.4 Inspection Log

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

Activity (Site) Name: Keller Property

BRRTS No.: 02-38-560993

Inspections are required to be conducted (see closure approval letter):
● annually
○ semi-annually
○ other – specify ____________

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

Inspection Date	Inspector Name	Item	Describe the condition of the item that is being inspected	Recommendations for repair or maintenance	Previous recommendations implemented?	Photographs taken and attached?
		☐ monitoring well ☐ cover/barrier ☐ vapor mitigation system ☐ other:			○ Y ○ N	○ Y ○ N
		☐ monitoring well ☐ cover/barrier ☐ vapor mitigation system ☐ other:			○ Y ○ N	○ Y ○ N
		☐ monitoring well ☐ cover/barrier ☐ vapor mitigation system ☐ other:			○ Y ○ N	○ Y ○ N
		☐ monitoring well ☐ cover/barrier ☐ vapor mitigation system ☐ other:			○ Y ○ N	○ Y ○ N
		☐ monitoring well ☐ cover/barrier ☐ vapor mitigation system ☐ other:			○ Y ○ N	○ Y ○ N
		☐ monitoring well ☐ cover/barrier ☐ vapor mitigation system ☐ other:			○ Y ○ N	○ Y ○ N

State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
2984 Shawano Avenue
Green Bay WI 54313-6727

Tony Evers, Governor
Preston D. Cole, Secretary
Telephone 608-266-2621
Toll Free 1-888-936-7463
TTY Access via relay - 711

February 22, 2019

Ken Keller
309 Ogden Street
Marinette, WI 54143

Subject: Remaining Actions Needed for Case Closure under Wis. Adm. Code chs. NR 700-754
Keller Property, 102 Water Street, Marinette, WI
DNR BRRTS Activity #: 02-38-560993
PECFA #: 54143-9999-02-A

Dear Mr. Keller:

On December 6, 2018, the Department of Natural Resources (DNR) reviewed your request for closure of the case described above. The DNR reviews environmental remediation cases for compliance with applicable local, state and federal laws. The following actions are required prior to the DNR granting you case closure in compliance with Wis. Stat. ch. 292 and Wis. Adm. Code chs. NR 700-754. Upon completion of these actions, closure approval will be provided. Pursuant to Wis. Adm. Code § NR 726.09 (2) (g), you are required to provide this information to the DNR within 120 days of the date of this letter.

Remaining Actions Needed

Monitoring Well Filling and Sealing
The monitoring wells at the site must be properly filled and sealed in accordance with Wis. Adm. Code ch. NR 141. Documentation of filling and sealing for all wells and boreholes must be submitted to Andy James on DNR Form 3300-005. To download the form, go online at dnr.wi.gov and search "form 3300-005".

Purge Water, Waste and/or Soil Pile Removal
Any remaining purge water, solid waste and/or contaminated soil piles generated as part of site investigation or remediation activities must be removed from the site and properly managed in accordance with the applicable local, state and federal laws. Once that work is complete, send documentation to the DNR regarding the methods used for appropriate treatment or disposal of the remaining purge water, solid waste and/or contaminated soil.

Documentation
When the required actions are completed, submit the appropriate documentation within 120 days of the date of this letter, to verify completion. At that point, your closure request can be approved and your case can be closed.

The submittal of both an electronic and paper copy are required in accordance with Wis. Adm. Code s. NR 726.09 (1). See *Guidance for Electronic Submittals for the Remediation and Redevelopment Program, RR- 690* for additional information. To view the document online, go to dnr.wi.gov and search "RR 690".

Listing on Database
This site will be listed on the DNR's Bureau for Remediation and Redevelopment Tracking System on the Web (BOTW) and RR Sites Map, to provide public notice of remaining contamination and continuing obligations. The continuing obligations will be specified in the final case closure approval letter sent to you. Information that was submitted with your closure request application will be included on BOTW, located online at dnr.wi.gov and search "BOTW".

In Conclusion

We appreciate your efforts to restore the environment at this site. This remedial action project is nearing completion. I look forward to working with you to complete all remaining actions that are necessary to achieve case closure.

If you have any questions regarding this letter, the DNR point of contact for you and your consultant for the remainder of the closure process for this case will be Andy James. Please submit documentation to Andy James at 2984 Shawano Avenue, Green Bay, WI 54313. Andy James can be reached at (920) 662-5149 or Andrew.James@wisconsin.gov.

Sincerely,

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

ec: Ron Anderson, METCO (rona@metcohq.com)

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

Case Closure - GIS Registry

Form 4400-202 (R 8/16)

SUBMIT AS UNBOUND PACKAGE IN THE ORDER SHOWN

Notice: Pursuant to ch. 292, Wis. Stats., and chs. NR 726 and 746, Wis. Adm. Code, this form is required to be completed for case closure requests. The closure of a case means that the Department of Natural Resources (DNR) has determined that no further response is required at that time based on the information that has been submitted to the DNR. All sections of this form must be completed unless otherwise directed by the Department. DNR will consider your request administratively complete when the form and all sections are completed, all attachments are included, and the applicable fees required under ch. NR 749, Wis. Adm. Code, are included, and sent to the proper destinations. Personal information collected will be used for administrative purposes and may be provided to requesters to the extent required by Wisconsin's Open Records Law (ss. 19.31 - 19.39, Wis. Stats.). Incomplete forms will be considered "administratively incomplete" and processing of the request will stop until required information is provided.

Site Information

BRRTS No.	VPLE No.		
02-38-560993			
Parcel ID No.			
251-04692-000			
FID No.	**WTM Coordinates**		
	X	Y	
None	708805	515937	
BRRTS Activity (Site) Name	**WTM Coordinates Represent:**		
Keller Property	☐ Source Area	☒ Parcel Center	
Site Address	**City**	**State**	**ZIP Code**
102 Water Street	Marinette	WI	54143
Acres Ready For Use			
1			

Responsible Party (RP) Name			
Ken Keller			
Company Name			
Mailing Address	**City**	**State**	**ZIP Code**
309 Ogden Street	Marinette	WI	54143
Phone Number	**Email**		
(715) 923-0449	KCK-KMK@new.rr.com		

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

Environmental Consultant Name			
Ron Anderson			
Consulting Firm			
METCO			
Mailing Address	**City**	**State**	**ZIP Code**
709 Gillette Street, Suite 3	La Crosse	WI	54603
Phone Number	**Email**		
(608) 781-8879	rona@metcohq.com		

Fees and Mailing of Closure Request

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 EPA (Environmental Program Associate) at **http://dnr.wi.gov/topic/Brownfields/Contact.html#tabx3**. Check all fees that apply:

   ☒ $1,050 Closure Fee

   ☒ $350 Database Fee for Groundwater or Monitoring Wells (Not Abandoned)

   ☒ $300 Database Fee for Soil

   Total Amount of Payment $ $1,700.00

   ☐ Resubmittal, Fees Previously Paid

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 portion of the Site Summary Section is not relevant to the case closure request, you must fully explain the reasons why in the relevant section of the form. All information submitted shall be legible. Providing illegible information will result in a submittal being considered incomplete until corrected.

1. General Site Information and Site History

A. Site Location: Describe the physical location of the site, both generally and specific to its immediate surroundings.
The Keller Property site, 102 Water Street, is located in the NE 1/4, NE 1/4, Section 8, Township 30 North, Range 24 East, in the City of Marinette, Marinette County, Wisconsin. The subject property is bound by a vacated railroad line to the north, a vacant lot to the west, Water Street to the south, and a vacant lot (undeveloped street) to the east.

B. Prior and current site usage: Specifically describe the current and historic occupancy and types of use.
A bulk petroleum storage facility operated on the property from at least 1895 until approximately 1980. Standard Oil Company operated the facility until 1961 and American Oil Company operated the facility from 1961 until 1980. The property was owned by a trucking company from 1980 until 1984. Keller Construction has owned the property since 1984.

C. Current zoning (e.g., industrial, commercial, residential) for the site and for neighboring properties, and how verified (Provide documentation in Attachment G).
According to the Marinette County GIS property assessment, the Keller Property site located at 102 Water Street is zoned "Commercial". The neighboring property to the north (Canadian National Railway) is zoned "Commercial", properties to the east and south are zoned "Residential", and the neighboring property to the west is zoned "Exempt" or "Other".

D. Describe how and when site contamination was discovered.
On August 21, 2013, Stantec Environmental completed eight soil borings (SB-1 through SB-8) at the subject property during a Phase 2 Environmental Site Assessment (P2ESA). One soil sample was collected form each boring for VOC and SVOC analysis. Temporary monitoring wells (TW-1 through TW-4) were installed in four of the borings with groundwater samples collected for VOC and SVOC analysis. Petroleum contamination was detected in all eight of the soil samples submitted for laboratory analysis. Petroleum compounds were detected in two of the groundwater samples with a NR140 PAL exceedance noted for Benzene (0.77 ppb) in TW-2. The petroleum contamination was subsequently reported to the WDNR, who then required that a site investigation be completed.

E. Describe the type(s) and source(s) or suspected source(s) of contamination.
Petroleum contamination appears to have originated from the former AST systems.

F. Other relevant site description information (or enter Not Applicable).
Not applicable.

G. List BRRTS activity/site name and number for BRRTS activities at this source property, including closed cases.
No other BRRTS activities exist at the source property.

H. List BRRTS activity/site name(s) and number(s) for all properties immediately adjacent to (abutting) this source property.
No other BRRTS activities exist immediately adjacent to this site.

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.
Geologic material in the area of investigation generally consists of fine to medium grained sand from surface to at least 14 feet bgs.

ii. Describe the composition, location and lateral extent, and depth of fill or waste deposits on the site.
Fill material consisting of silt, sand, and gravel was encountered across the northern/central portion of the site from ground surface to depths ranging from 3 to 8 feet bgs. Peat was encountered at the east end of the site near the marsh area from ground surface to depths ranging from 3 to 6 feet bgs.

iii. Describe the depth to bedrock, bedrock type, competency and whether or not it was encountered during the investigation.
Bedrock was not encountered during the investigation, but the unconsolidated materials are underlain by limestone bedrock at approximately 75 to 100 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).
With the exception of the on-site building, the majority of the property is covered by a newly installed gravel cap (installed October 2017) to the west and north of the on-site building. An area of grass/gravel exists along the east side of the building, and two areas of concrete exist along the west side of the building. The southern portion of the property is covered by sand and the area of the cell tower in the southwest corner of the property is covered by crushed rock.

B. Groundwater

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

Groundwater exists at approximately 3.30 to 5.01 feet below ground surface depending on well location and time of year. Free product has never been encountered at the site. The stratigraphic unit where the water table is found consists of sand.

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

Groundwater elevations measured in the monitoring wells indicated a local groundwater flow direction to be predominately towards the north. Groundwater flow deeper in the aquifer is unknown, as no piezometers were installed during the investigation.

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

On January 20, 2016, METCO conducted slug tests on monitoring wells MW-1, MW-2, and MW-4. The slug test data was evaluated using the curve fitting program "Hydro-Test for Windows" Produced by Dakota Environmental, Inc. Slug test data was evaluated using the Bouwer and Rice method. Hydrogeologic parameters were estimated as follows:
Monitoring Well MW-1
Hydraulic Conductivity (K) = 6.00E-03 cm/sec
Transmissivity = 1.66E-00 cm2/sec
Flow Velocity (V=KI/n) = 10.89956 m/yr

Monitoring Well MW-2
Hydraulic Conductivity (K) = 1.08E-02 cm/sec
Transmissivity = 3.10E-00 cm2/sec
Flow Velocity (V=KI/n) = 19.64131 m/yr

Monitoring Well MW-4
Hydraulic Conductivity (K) = 1.64E-03 cm/sec
Transmissivity = 4.39E-01 cm2/sec
Flow Velocity (V=KI/n) = 2.97107 m/yr

Since the thickness of the unconfined aquifer was unknown, the bottoms of monitoring wells MW-1, -2, and -4 were assumed as the lower extent of the aquifer for calculation purposes.

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

The subject property and surrounding properties are all served by the City of Marinette municipal water supply, which draws it's potable water from Green Bay. Numerous non-potable, private wells still remain within the city limits. However, the city does not have any documentation of any private wells within 1,200 feet 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.

On May 18-19, 2015, Geiss Soil & Samples, LLC of Merrill, Wisconsin completed a Geoprobe project under the supervision and direction of METCO personnel. Twenty-three Geoprobe borings were completed with fourty-two soil samples and twenty-three groundwater samples collected for field and laboratory analysis. Upon completion the borings were properly abandoned. (Site Investigation Report - May 26, 2016)

On November 23, 2015, Geiss Soil & Samples, LLC of Merrill, Wisconsin completed a Drilling project under the supervision and direction of METCO personnel. METCO completed six soil borings and installed six monitoring wells (MW-1 thru MW-6). Eighteen soil samples were collected for field and laboratory analysis. Upon completion, the monitoring wells were properly developed. (Site Investigation Report - May 26, 2016)

On January 20, 2016, METCO collected groundwater samples from six monitoring wells (MW-1 thru MW-6) for field and laboratory analysis. Field measurements for water level, Dissolved Oxygen, pH, ORP, temperature, and Specific Conductance were collected from all sampled wells. METCO also conducted slug tests on three of the monitoring wells. The monitoring well network was surveyed by Fauerbach Surveying & Engineering to feet mean sea level at this time. (Site Investigation Report - May 26, 2016)

On April 11, 2017, Geiss Soil and Samples LLC, of Merrill, Wisconsin, completed a Geoprobe project under the supervision and direction of METCO personnel. Four Geoprobe borings (G-24 thru G-27) were completed with four

soil samples collected for field and laboratory analysis. Soil boring G-24 was converted to a temporary well (TW-24) and was installed to 4 feet bgs. (Letter Report - May 12, 2017)

On April 11, 2017, METCO personnel collected groundwater samples from six monitoring wells (MW-1 thru MW-6) and the newly installed temporary well TW-24 for field and laboratory analysis. Field measurements for water level, Dissolved Oxygen, pH, ORP, temperature, and Specific Conductivity were collected from all sampled wells. (Letter Report - May 12, 2017)

On October 10-11, 2017, JWK Trucking of Marinette, Wisconsin, conducted a capping project under the supervision and direction of METCO. The capping was being done to address the area of direct contact soil contamination (PVOC's and PAH's) at the site. One foot of gravel was placed over the grass and sand covering two adjacent rectangular areas (Area A: 190' long x 40' wide and Area B: 117' long x 70' wide). Prior to the gravel being leveled and compacted, all on-site monitoring wells were raised exactly 1 foot to be flush with the proposed ground surface (bgs). A total of 1,136.12 tons of gravel was used for capping the two areas to 1 foot above the original ground surface. (Letter Report - January 31, 2018)

On October 10, 2017, METCO personnel collected a groundwater sample from monitoring well MW-1 for laboratory analysis. Field measurements for water level, Dissolved Oxygen, and temperature, were collected from MW-1. Water level measurements were also collected from six additional temporary/monitoring wells (TW-24, MW-2, MW-3, MW-4, MW-5, and MW-6). (Letter Report - January 31, 2018)

On January 8, 2018, METCO personnel collected a groundwater sample from monitoring well MW-1 for laboratory analysis. Field measurements for water level, Dissolved Oxygen, pH, ORP, temperature, and Specific Conductance were collected from MW-1. Water level measurements were also collected from six additional temporary/monitoring wells (TW-24, MW-2, MW-3, MW-4, MW-5, and MW-6). The ground surface and top of PVC elevations of the monitoring wells were also re-surveyed to feet mean sea level (msl) by METCO personnel at this time, as the wells were raised 1 foot during the capping project on October 10-11, 2017. (Letter Report - January 31, 2018)

ii. Identify whether contamination extends beyond the source property boundary, and if so describe the media affected (e.g., soil, groundwater, vapors and/or sediment, etc.), and the vertical and horizontal extent of impacts.

Soil contamination exceeding the NR720 Groundwater RCL and/or Non-Industrial Direct Contact RCL values extends up to 9 feet into the Canadian National Railroad property, measuring approximately 123 feet wide at the property boundary and is up to 4 feet thick.

Groundwater contamination exceeding the NR140 ES does not extend beyond the source property boundary.

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

No structural impediments interfered with the completion of the site investigation.

B. Soil

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

An area of unsaturated soil contamination, which exceeds the NR720 Groundwater RCL's, exists in the area of the former AST systems and appears to measure up to 182 feet long, up to 165 feet wide, and up to 4 feet thick. Two areas of unsaturated soil contamination exceeding NR720 Non-Industrial Direct Contact RCL values also exists in the area of the former AST systems and in the area of the former loading platform. The first area near the former AST systems appears to measure up to 110 feet long, up to 108 feet wide, and up to 4 feet thick. The second area near the former loading platform appears to measure up to 52 feet long, up to 12 feet wide, and up to 4 feet thick.

The only utility line that exists in the area of residual soil contamination is a buried electric line and a telephone line. Electric and telephone lines typically exist within 3 feet of ground surface and are backfilled with native soil, making them unlikely to be preferential contamination migration pathways.

The extent of petroleum contamination in residual soil does not extend up to or underneath any buildings. Therefore, there does not appear to be any risk for vapor intrusion.

ii. Describe the concentration(s) and types of soil contaminants found in the upper four feet of the soil column.

Residual soil contamination which exceeds the NR720 RCL's within the upper four feet of ground surface remains in the following locations:

SB3: Benzene (3.4 ppm), Ethylbenzene (7.2 ppm), 2-Methylnaphthalene (4.5 ppm), Naphthalene (6.3 ppm), Toluene (2.1 ppm), Trimethylbenzenes (10.3 ppm), and Xylene (11.1 ppm) at 2-4 feet bgs
SB8: Benzene (0.0072 ppm), Ethylbenzene (0.032 ppm), and Naphthalene (0.073 ppm) at 0-2 feet bgs
G-1-1: Benzene (3.03 ppm), Ethylbenzene (6 ppm), Toluene (2.94 ppm), Trimethylbenzenes (22.6 ppm), Xylene (16

ppm), and Lead (186 ppm) at 3.5 feet bgs
G-2-1: Benzene (0.115 ppm), Chrysene (0.194 ppm), Trimethylbenzenes (3.31 ppm), and Lead (72.7 ppm) at 3.5 feet bgs
G-4-1: Benzo(a)pyrene (0.213 ppm), Chrysene (0.231 ppm), and Lead (28.2 ppm) at 3.5 feet bgs
G-6-1: Benzo(a)pyrene (0.187 ppm), Dibenzo(a,h)anthracene (0.16 ppm), and Lead (361 ppm) at 3.5 feet bgs
G-7-1: Trimethylbenzenes (1.46 ppm) and Lead (65.2 ppm) at 3.5 feet bgs
G-8-1: Benzo(a)pyrene (0.54 ppm), Benzo(b)fluoranthene (0.72 ppm), Chrysene (0.44 ppm), and Lead (186 ppm) at 3.5 feet bgs
G-9-1: Benzo(a)pyrene (0.177 ppm), Chrysene (0.207 ppm), and Lead (99.1 ppm) at 3.5 feet bgs
G-15-1: Benzo(a)anthracene (10.9 ppm), Benzo(a)pyrene (9.3 ppm), Benzo(b)fluoranthene (11 ppm), Chrysene (7.5 ppm), Dibenzo(a,h)anthracene (1.42 ppm), Indeno (1,2,3-cd)pyrene (5.2 ppm), and Lead (148 ppm) at 3.5 feet bgs
G-16-1: Lead (43 ppm) at 3.5 feet bgs
G-17-1: Benzo(a)pyrene (0.309 ppm), Chrysene (0.35 ppm), Benzene (0.101 ppm), Toluene (1.53 ppm), Trimethylbenzenes (1.68 ppm), and Lead (119 ppm) at 3.5 feet bgs
G-18-1: Benzo(a)pyrene (0.285 ppm), Chrysene (0.312 ppm), and Lead (254 ppm) at 3.5 feet bgs
G-19-1: Benzo(a)pyrene (0.44 ppm), Benzo(b)fluoranthene (0.60 ppm), Chrysene (0.45 ppm), and Lead (175 ppm) at 3.5 feet bgs
G-20-1: Benzo(a)pyrene (0.91 ppm), Benzo(b)fluoranthene (1.41 ppm), Chrysene (1.02 ppm), and Lead (60.6 ppm) at 3.5 feet bgs
MW-1-1: Benzo(a)pyrene (0.119 ppm), Chrysene (0.291 ppm), Benzene (1.27 ppm), Ethylbenzene (1.99 ppm), Naphthalene (2.39 ppm), Toluene (3.8 ppm), Trimethylbenzenes (12.2 ppm), Xylene (8.9 ppm), and Lead (70.5 ppm) at 3.5 feet bgs
MW-2-1: Benzene (0.048 ppm) and Lead (54.8 ppm) at 3.5 feet bgs
MW-3-1: Benzo(a)pyrene (0.183 ppm) and Lead (227 ppm) at 3.5 feet bgs
MW-4-1: Lead (35.8 ppm) at 3.5 feet bgs
MW-5-1: Benzo(a)anthracene (1.24 ppm), Benzo(a)pyrene (1.19 ppm), Benzo(b)fluoranthene (1.89 ppm), Benzene (0.196 ppm), Chrysene (1.21 ppm), and Dibenzo(a,h)anthracene (0.182 ppm) at 3.5 feet bgs
MW-6-1: Benzo(a)pyrene (0.131 ppm) and Lead (72.1 ppm) at 3.5 feet bgs
G-26-1: Benzene (0.117 ppm) and Lead (62.7 ppm) at 3.5 feet bgs.

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

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

C. Groundwater

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

A dissolved phase contaminant plume exceeding the NR140 ES and/or PAL has formed at the watertable in the area of the former AST systems and has migrated toward the north. This plume is approximately 205 feet long and up to 104 feet wide at its widest point.

The only utility line that exists in the area of groundwater contamination is a buried electric line and a telephone line. Electric and telephone lines typically exist within 3 feet of ground surface and are backfilled with native soil, making them unlikely to be preferential contamination migration pathways.

The extent of petroleum contamination in groundwater does not extend up to or underneath any buildings. Therefore, there does not appear to be any risk for vapor intrusion.

The subject property and surrounding properties are all served by the City of Marinette municipal water supply, which draws it's potable water from Green Bay. Numerous non-potable, private wells still remain within the city limits. However, the city does not have any documentation of any private wells within 1,200 feet of the subject property.

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

Free product has never been encountered at this site.

D. Vapor

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

There does not appear to be any vapor intrusion risk to the on-site building for the following reasons: 1) Free Product

has not been encountered at the subject property. 2) Benzene levels in groundwater are less than 1,000 ppb. 3) The extent of petroleum contamination in soil and groundwater does not extend beneath the on-site building. 4) Although soil and groundwater contamination exist near the on-site building, the contaminants in this area were primarily for lead and PAH compounds, which do not readily volatilize.

ii. Identify the applicable DNR action levels and the land use classification used to establish them. Describe where the DNR action levels were reached or exceeded (e.g., sub slab, indoor air or both).

No indoor air/sub slab vapor samples were collected.

E. Surface Water and Sediment

i. Identify whether surface water and/or sediment was assessed and describe the impacts found. If this pathway was not assessed, explain why.

The nearest surface water is a marsh/wetland area along the Menominee River, which exists approximately 35 to 50 feet to the north of the subject property. In February 2015, METCO requested permission from the City of Marinette to complete soil borings on the city property adjacent to the marsh/wetland, but was denied access by the city attorney.

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

No surface water or sediment samples were collected.

4. Remedial Actions Implemented and Residual Levels at Closure

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

On October 10-11, 2017, JWK Trucking of Marinette, Wisconsin, conducted a capping project under the supervision and direction of METCO. The capping was being done to address the area of direct contact soil contamination (PVOC's and PAH's) at the site. One foot of gravel was placed over the grass and sand covering two adjacent rectangular areas (Area A: 190' long x 40' wide and Area B: 117' long x 70' wide). Prior to the gravel being leveled and compacted, all on-site monitoring wells were raised exactly 1 foot to be flush with the proposed ground surface (bgs). A total of 1,136.12 tons of gravel was used for capping the two areas to 1 foot above the original ground surface. (Letter Report - January 31, 2018)

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

No immediate or interim actions occurred at this site.

C. Describe the *active* remedial actions taken at the source property, including: type of remedial system(s) used for each media affected; the size and location of any excavation or in-situ treatment; the effectiveness of the systems to address the contaminated media and substances; operational history of the systems; and summarize the performance of the active remedial actions. Provide any system performance documentation in Attachment A.7.

On October 10-11, 2017, JWK Trucking of Marinette, Wisconsin, conducted a capping project under the supervision and direction of METCO. The capping was being done to address the area of direct contact soil contamination (PVOC's and PAH's) at the site. One foot of gravel was placed over the grass and sand covering two adjacent rectangular areas (Area A: 190' long x 40' wide and Area B: 117' long x 70' wide). Prior to the gravel being leveled and compacted, all on-site monitoring wells were raised exactly 1 foot to be flush with the proposed ground surface (bgs). A total of 1,136.12 tons of gravel was used for capping the two areas to 1 foot above the original ground surface. (Letter Report - January 31, 2018)

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

No evaluation of Green and Sustainable Remediation was conducted.

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

An area of unsaturated soil contamination, which exceeds the NR720 Groundwater RCL's, exists in the area of the former AST systems and appears to measure up to 182 feet long, up to 165 feet wide, and up to 4 feet thick. Two areas of unsaturated soil contamination exceeding NR720 Non-Industrial Direct Contact RCL values also exists in the area of the former AST systems and in the area of the former loading platform. The first area near the former AST systems appears to measure up to 110 feet long, up to 108 feet wide, and up to 4 feet thick. The second area near the former loading platform appears to measure up to 52 feet long, up to 12 feet wide, and up to 4 feet thick.

A dissolved phase contaminant plume exceeding the NR140 ES and/or PAL has formed at the watertable in the area of the former AST systems and has migrated toward the north. This plume is approximately 205 feet long and up to 104 feet wide at its widest point.

Soil contamination exceeding the NR720 Groundwater RCL and/or Non-Industrial Direct Contact RCL values extends up to 9 feet into the Canadian National Railroad property, measuring approximately 123 feet wide at the property boundary and is up to 4 feet thick.

Groundwater contamination exceeding the NR140 ES does not extend beyond the source property boundary.

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

Residual soil contamination within the upper four feet of ground surface which exceed the NR720 Non-Industrial Direct Contact RCL's remains in the following location:

SB3: Benzene (3.4 ppm), Ethylbenzene (7.2 ppm), 2-Methylnaphthalene (4.5 ppm), Naphthalene (6.3 ppm), Toluene (2.1 ppm), Trimethylbenzenes (10.3 ppm), and Xylene (11.1 ppm) at 2-4 feet bgs
SB8: Benzene (0.0072 ppm), Ethylbenzene (0.032 ppm), and Naphthalene (0.073 ppm) at 0-2 feet bgs
G-1-1: Benzene (3.03 ppm) at 3.5 feet bgs
G-4-1: Benzo(a)pyrene (0.213 ppm) at 3.5 feet bgs
G-6-1: Benzo(a)pyrene (0.187 ppm) and Dibenzo(a,h)anthracene (0.16 ppm) at 3.5 feet bgs
G-8-1: Benzo(a)pyrene (0.54 ppm) at 3.5 feet bgs
G-9-1: Benzo(a)pyrene (0.177 ppm) at 3.5 feet bgs
G-15-1: Benzo(a)anthracene (10.9 ppm), Benzo(a)pyrene (9.3 ppm), Benzo(b)fluoranthene (11 ppm), Dibenzo(a,h) anthracene (1.42 ppm), Indeno (1,2,3-cd)pyrene (5.2 ppm), and Lead (148 ppm) at 3.5 feet bgs
G-17-1: Benzo(a)pyrene (0.309 ppm) at 3.5 feet bgs
G-18-1: Benzo(a)pyrene (0.285 ppm) at 3.5 feet bgs
G-19-1: Benzo(a)pyrene (0.44 ppm) at 3.5 feet bgs
G-20-1: Benzo(a)pyrene (0.91 ppm), Benzo(b)fluoranthene (1.41 ppm) at 3.5 feet bgs
MW-1-1: Benzo(a)pyrene (0.119 ppm) at 3.5 feet bgs
MW-3-1: Benzo(a)pyrene (0.183 ppm) at 3.5 feet bgs
MW-5-1: Benzo(a)anthracene (1.24 ppm), Benzo(a)pyrene (1.19 ppm), Benzo(b)fluoranthene (1.89 ppm), Benzene (0.196 ppm), and Dibenzo(a,h)anthracene (0.182 ppm) at 3.5 feet bgs
MW-6-1: Benzo(a)pyrene (0.131 ppm) at 3.5 feet bgs.

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

Residual soil contamination above the observed low water table which currently exceed the NR720 Groundwater RCL's remains in the following locations:

SB3: Benzene (3.4 ppm), Ethylbenzene (7.2 ppm), 2-Methylnaphthalene (4.5 ppm), Naphthalene (6.3 ppm), Toluene (2.1 ppm), Trimethylbenzenes (10.3 ppm), and Xylene (11.1 ppm) at 2-4 feet bgs
SB8: Benzene (0.0072 ppm), Ethylbenzene (0.032 ppm), and Naphthalene (0.073 ppm) at 0-2 feet bgs
G-1-1: Benzene (3.03 ppm), Ethylbenzene (6 ppm), Toluene (2.94 ppm), Trimethylbenzenes (22.6 ppm), Xylene (16 ppm), and Lead (186 ppm) at 3.5 feet bgs
G-2-1: Benzene (0.115 ppm), Chrysene (0.194 ppm), Trimethylbenzenes (3.31 ppm), and Lead (72.7 ppm) at 3.5 feet bgs
G-4-1: Chrysene (0.231 ppm), and Lead (28.2 ppm) at 3.5 feet bgs
G-6-1: Lead (361 ppm) at 3.5 feet bgs
G-7-1: Trimethylbenzenes (1.46 ppm) and Lead (65.2 ppm) at 3.5 feet bgs
G-8-1: Benzo(a)pyrene (0.54 ppm), Benzo(b)fluoranthene (0.72 ppm), Chrysene (0.44 ppm), and Lead (186 ppm) at 3.5 feet bgs
G-9-1: Chrysene (0.207 ppm), and Lead (99.1 ppm) at 3.5 feet bgs
G-15-1: Benzo(a)pyrene (9.3 ppm), Benzo(b)fluoranthene (11 ppm), Chrysene (7.5 ppm), and Lead (148 ppm) at 3.5 feet bgs
G-16-1: Lead (43 ppm) at 3.5 feet bgs
G-17-1: Chrysene (0.35 ppm), Benzene (0.101 ppm), Toluene (1.53 ppm), Trimethylbenzenes (1.68 ppm), and Lead (119 ppm) at 3.5 feet bgs
G-18-1: Chrysene (0.312 ppm), and Lead (254 ppm) at 3.5 feet bgs
G-19-1: Benzo(b)fluoranthene (0.60 ppm), Chrysene (0.45 ppm), and Lead (175 ppm) at 3.5 feet bgs
G-20-1: Benzo(a)pyrene (0.91 ppm), Benzo(b)fluoranthene (1.41 ppm), Chrysene (1.02 ppm), and Lead (60.6 ppm) at 3.5 feet bgs
MW-1-1: Chrysene (0.291 ppm), Benzene (1.27 ppm), Ethylbenzene (1.99 ppm), Naphthalene (2.39 ppm), Toluene (3.8 ppm), Trimethylbenzenes (12.2 ppm), Xylene (8.9 ppm), and Lead (70.5 ppm) at 3.5 feet bgs
MW-2-1: Benzene (0.048 ppm) and Lead (54.8 ppm) at 3.5 feet bgs
MW-3-1: Lead (227 ppm) at 3.5 feet bgs
MW-4-1: Lead (35.8 ppm) at 3.5 feet bgs
MW-5-1: Benzo(a)pyrene (1.19 ppm), Benzo(b)fluoranthene (1.89 ppm), Benzene (0.196 ppm), and Chrysene (1.21 ppm) at 3.5 feet bgs
MW-6-1: Lead (72.1 ppm) at 3.5 feet bgs
G-26-1: Benzene (0.117 ppm) and Lead (62.7 ppm) at 3.5 feet bgs.

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

Any remaining exposure pathways will be addressed via natural attenuation and a cap maintenance plan.

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

Since groundwater contaminant levels appear to be stable, natural attenuation appears to be an effective method in reducing contaminant mass and concentration.

J. Identify how all exposure pathways (soil, groundwater, vapor) were removed and/or adequately addressed by immediate, interim and/or remedial action(s).

Any remaining exposure pathways will be addressed via natural attenuation and a cap maintenance plan.

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

No system hardware is anticipated to be left in place after site closure.

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

Monitoring wells MW-1 (Benzene, Ethylbenzene, Naphthalene, Trimethylbenzenes, and Xylene), MW-2 (Benzo(a)pyrene, Benzo(b)fluoranthene, and Chrysene), MW-4 (Benzene), MW-5 (Benzo(a)pyrene, Benzo(b)fluoranthene, and Chrysene), and MW-6 (Benzene, Benzo(a)pyrene, Benzo(b)fluoranthene, and Chrysene) currently exceed the NR140 ES and/or PAL.

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

No indoor air/sub slab vapor samples were collected.

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

No surface water or sediment samples were collected.

5. Continuing Obligations: Situations where sites, including all affected properties and rights-of-way (ROWs), are included on the DNR's GIS Registry. In certain situations, maintenance plans are also required, and must be included in Attachment D.

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

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

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

6. Underground Storage Tanks

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

B. Do any upgraded tanks meeting the requirements of ch. ATCP 93, Wis. Adm. Code, exist on the property? ○ Yes ◉ No

C. If the answer to question 6.B. is yes, is the leak detection system currently being monitored? ○ Yes ○ No

General Instructions

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

Data Tables (Attachment A)

Directions for Data Tables:

- Use **bold** and italics font for information of importance on tables and figures. Use **bold** font for ch. NR 140, Wis. Adm. Code ES attainments or exceedances, and *italicized font* for ch. NR 140, Wis. Adm. Code, PAL attainments or exceedances.
- Use **bold** font to identify individual ch. NR 720 Wis. Adm. Code RCL exceedances. Tables should also include the corresponding groundwater pathway and direct contact pathway RCLs for comparison purposes. Cumulative hazard index and cumulative cancer risk exceedances should also be tabulated and identified on Tables A.2 and A.3.
- Do not use shading or highlighting on the analytical tables.
- Include on Data Tables the level of detection for results which are below the detection level (i.e., do not just list as no detect (ND)).
- Include the units on data tables.
- Summaries of all data must include information collected by previous consultants.
- Do not submit lab data sheets unless these have not been submitted in a previous report. Tabulate all data required in s. NR 716.15 (3)(c), Wis. Adm. Code, in the format required in s. NR 716.15(4)(e), Wis. Adm. Code.
- Include in Attachment A all of the following tables, in the order prescribed below, with the specific Closure Form titles noted on the separate attachments (e.g., Title: A.1. Groundwater Analytical Table; A.2. Soil Analytical Results Table, etc.).
- For required documents, each table (e.g., A.1., A.2., etc.) should be a separate Portable Document Format (PDF).

A. Data Tables

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

A.2. **Soil Analytical Results Table(s):** Table(s) showing **all** soil analytical results and collection dates. Indicate if sample was collected above or below the observed low water table (unsaturated versus saturated).

A.3. **Residual Soil Contamination Table(s):** Table(s) showing the analytical results of only the residual soil contamination at the time of closure. This table shall be a subset of table A.2 and should include only the soil sample locations that exceed an RCL. Indicate if sample was collected above or below the observed low water table (unsaturated versus saturated). Table A.3 is optional only if a total of fewer than 15 soil samples have been collected at the site.

A.4. **Vapor Analytical Table(s)**: Table(s) showing type(s) of samples, sample collection methods, analytical method, sample results, date of sample collection, time period for sample collection, method and results of leak detection, and date, method and results of communication testing.

A.5. **Other Media of Concern (e.g., sediment or surface water)**: Table(s) showing type(s) of sample, sample collection method, analytical method, sample results, date of sample collection, and time period for sample collection.

A.6. **Water Level Elevations:** Table(s) showing all water level elevation measurements and dates from all monitoring wells. If present, free product should be noted on the table.

A.7. **Other:** This attachment should include: 1) any available tabulated natural attenuation data; 2) data tables pertaining to engineered remedial systems that document operational history, demonstrate system performance and effectiveness, and display emissions data; and (3) any other data tables relevant to case closure not otherwise noted above. If this section is not applicable, please explain the reasons why.

Maps, Figures and Photos (Attachment B)

Directions for Maps, Figures and Photos:

- Provide on paper no larger than 11 x 17 inches, unless otherwise directed by the Department. Maps and figures may be submitted in a larger electronic size than 11 x 17 inches, in a PDF readable by the Adobe Acrobat Reader. However, those larger-size documents must be legible when printed.
- Prepare visual aids, including maps, plans, drawings, fence diagrams, tables and photographs according to the applicable portions of ss. NR 716.15(4), 726.09(2) and 726.11(3), (5) and (6), Wis. Adm. Code.
- Include all sample locations.
- Contour lines should be clearly labeled and defined.
- Include in Attachment B all of the following maps and figures, in the order prescribed below, with the specific Closure Form titles noted on the separate attachments (e.g., Title: B.1. Location Map; B.2. Detailed Site Map, etc).
- For the electronic copies that are required, each map (e.g., B.1.a., B.2.a, etc.,) should be a separate PDF.
- Maps, figures and photos should be dated to reflect the most recent revision.

B.1. Location Maps

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

B.1.b. **Detailed Site Map:** A map that shows all relevant features (buildings, roads, current ground surface cover, individual property boundaries for all affected properties, contaminant sources, utility lines, monitoring wells and potable wells) within the contaminated area. This map is to show the location of all contaminated public streets, and highway and railroad rights-of-way in relation to the source property and in relation to the boundaries of groundwater contamination attaining or exceeding a ch. NR 140 ES, and/or in relation to the boundaries of soil contamination attaining or exceeding a RCL. Provide parcel identification numbers for all affected properties.

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

B.2. Soil Figures

B.2.a. **Soil Contamination:** Figure(s) showing the location of **all** identified unsaturated soil contamination. Use a single contour to show the horizontal extent of each area of contiguous soil contamination that exceeds a soil to groundwater pathway RCL as determined under ch. NR 720.Wis. Adm. Code. A separate contour line should be used to indicate the horizontal extent of each area of contiguous soil contamination that exceeds a direct contact RCL exceedances (0-4 foot depth).

B.2.b. **Residual Soil Contamination:** Figure(s) showing only the locations of soil samples where unsaturated soil contamination remains at the time of closure (locations represented in Table A.3). Use a single contour to show the horizontal extent of each area of contiguous soil contamination that exceeds a soil to groundwater pathway RCL as determined under ch. NR 720 Wis. Adm. Code. A separate contour line should be used to indicate the horizontal extent of each area of contiguous soil contamination that exceeds a direct contact RCL exceedence (0-4 foot depth).

B.3. Groundwater Figures

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

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

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

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

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

B.4. Vapor Maps and Other Media

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

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

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

B.5. Structural Impediment Photos: One or more photographs documenting the structural impediment feature(s) which precluded a complete site investigation or remediation at the time of the closure request. The photographs should document the area that could not be investigated or remediated due to a structural impediment. The structural impediment should be indicated on Figures B.2.a and B.2.b.

Documentation of Remedial Action (Attachment C)

Directions for Documentation of Remedial Action:

- Include in Attachment C all of the following documentation, in the order prescribed below, with the specific Closure Form titles noted on the separate attachments (e.g., Title: C.1. Site Investigation Documentation; C.2. Investigative Waste, etc.).
- If the documentation requested below has already been submitted to the DNR, please note the title and date of the report for that particular document requested.

C.1. **Site investigation documentation,** that has not otherwise been submitted with the Site Investigation Report.

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

C.3. Provide a **description of the methodology** used along with all supporting documentation if the RCLs are different than those contained in the Department's RCL Spreadsheet available at: http://dnr.wi.gov/topic/Brownfields/Professionals.html.

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

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

C.6. **Other**. Include any other relevant documentation not otherwise noted above (This section may remain blank).

Maintenance Plan(s) and Photographs (Attachment D)

Directions for Maintenance Plans and Photographs:

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

D.1. **Descriptions of maintenance action(s) required for maximizing effectiveness of the engineered control, vapor mitigation system, feature or other action for which maintenance is required:**

- Provide brief descriptions of the type, depth and location of residual contamination.

- Provide a description of the system/cover/barrier/monitoring well(s) to be maintained.
- Provide a description of the maintenance actions required for maximizing effectiveness of the engineered control, vapor mitigation system, feature or other action for which maintenance is required.
- Provide contact information, including the name, address and phone number of the individual or facility who will be conducting the maintenance.

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

D.3. **Photographs** for site or facilities with a cover or other performance standard, a structural impediment or a vapor mitigation system, include one or more photographs documenting the condition and extent of the feature at the time of the closure request. Pertinent features shall be visible and discernible. Photographs shall be submitted with a title related to the site name and location, and the date on which it was taken.

D.4. **Inspection log**, to be maintained on site, or at a location specified in the maintenance plan or approval letter. The inspection and maintenance log is found at: http://dnr.wi.gov/files/PDF/forms/4400/4400-305.pdf.

Monitoring Well Information (Attachment E)

Directions for Monitoring Well Information:
For all wells that will remain in use, be transferred to another party, or that could not be located; attach monitoring well construction and development forms (DNR Form 4400-113 A and B: http://dnr.wi.gov/topic/groundwater/documents/forms/4400_113_1_2.pdf)

Select One:

○ No monitoring wells were installed as part of this response action.

◉ All monitoring wells have been located and will be properly abandoned upon the DNR granting conditional closure to the site

○ ***Select One or More:***

☐ Not all monitoring wells can be located, despite good faith efforts. Attachment E must include a description of efforts made to locate the wells.

☐ One or more wells will remain in use at the site after this closure. Attachment E must include documentation as to the reason (s) the well(s) will remain in use. When one or more monitoring wells will remain in use this is considered a continuing obligation and a maintenance plan will be required and must be included in Attachment D.

☐ One or more monitoring wells will be transferred to another owner upon case closure being granted. Attachment E should include documentation identifying the name, address and email for the new owner(s). Provide documentation from the party accepting future responsibility for monitoring well(s).

Source Legal Documents (Attachment F)

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

F.1. **Deed:** The most recent deed with legal description clearly listed.

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

F.2. **Certified Survey Map:** A copy of the certified survey map or the relevant section of the recorded plat map for those properties where the legal description in the most recent deed refers to a certified survey map or a recorded plat map. In cases where the certified survey map or recorded plat map are not legible or are unavailable, a copy of a parcel map from a county land information office may be substituted. A copy of a parcel map from a county land information office shall be legible, and the parcels identified in the legal description shall be clearly identified and labeled with the applicable parcel identification number.

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

F.4. **Signed Statement:** A statement signed by the Responsible Party (RP), which states that he or she believes that the attached legal description(s) accurately describe(s) the correct contaminated property or properties. This section applies to the source property only. Signed statements for Other Affected Properties should be included in Attachment G.

Notifications to Owners of Affected Properties (Attachment G)

Directions for Notifications to Owners of Affected Properties:

Complete the table on the following page for sites which require notification to owners of affected properties pursuant to ch. 292, Wis. Stats. and ch. NR 725 and 726, Wis. Adm. Code. Personal information collected will be used for administrative purposes and may be provided to requesters to the extent required by Wisconsin's Open Records law [ss. 19.31- 19.39,Wis. Stats.]. The DNR's "Guidance on Case Closure and the Requirements for Managing Continuing Obligations" (PUB-RR-606) lists specific notification requirements http://dnr.wi.gov/files/PDF/pubs/rr/RR606.pdf.

State law requires that the responsible party provide a 30-day, written advance notification to certain persons prior to applying for case closure. This requirement applies if: (1) the person conducting the response action does not own the source property; (2) the contamination has migrated onto another property; and/or (3) one or more monitoring wells will not be abandoned. Use form 4400-286, Notification of Continuing Obligations and Residual Contamination, at http://dnr.wi.gov/files/PDF/forms/4400/4400-286.pdf

Include a copy of each notification sent and accompanying proof of delivery, i.e., return receipt or signature confirmation. (These items will not be placed on the GIS Registry.)

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

- **Deed:** The most recent deed with legal descriptions clearly listed for all affected properties.
  Note: If a property has been purchased with a land contract and the purchaser has not yet received a deed, a copy of the land contract which includes the legal description shall be submitted instead of the most recent deed. If the property has been inherited, written documentation of the property transfer should be submitted along with the most recent deed.
- **Certified Survey Map:** A copy of the certified survey map or the relevant section of the recorded plat map for those properties where the legal description in the most recent deed refers to a certified survey map or a recorded plat map. In cases where the certified survey map or recorded plat map are not legible or are unavailable, a copy of a parcel map from a county land information office may be substituted. A copy of a parcel map from a county land information office shall be legible, and the parcels identified in the legal description shall be clearly identified and labeled with the applicable parcel identification number.
- **Verification of Zoning:** Documentation (e.g., official zoning map or letter from municipality) of the property's or properties' current zoning status.
- **Signed Statement:** A statement signed by the Responsible Party (RP), which states that he or she believes the attached legal description(s) accurately describe(s) the correct contaminated property or properties.

Notifications to Owners of Affected Properties (Attachment G)

ID	Address of Affected Property	Parcel ID No.	Date of Receipt of Letter	Type of Property Owner	WTMX	WTMY	Reasons Notification Letter Sent: Residual Groundwater Contamination = or > ES	Residual Soil Contamination Exceeds RCLs	Monitoring Wells: Not Abandoned	Monitoring Wells: Continued Monitoring	Cover/Barrier/Engineered Control	Structural Impediment	Industrial RCLs Met/Applied	Vapor Mitigation System(VMS)	Dewatering System Needed for VMS	Compounds of Concern in Use	Commercial/Industrial Vapor Exposure Assumptions Applied	Residual Volatile Contamination Poses Future Risk of Vapor Intrusion	Site Specification Situation
A	Canadian National Railroad		06/30/2018	ROWH	708813	515975		X											
B																			
C																			
D																			

Signatures and Findings for Closure Determination

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

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

☒ The response action(s) for this site addresses media other than groundwater.

Engineering Certification

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

THOMAS PIGNET	Engineer	
Printed Name	Title	
Thomas Pignet	1-14-19	Wisconsin 33227-006
Signature	Date	P.E. Stamp and Number

Hydrogeologist Certification

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

Ronald J. Anderson	Senior Hydrogeologist/Project Manager	
Printed Name	Title	
Ronald J. Anderson	8/6/18	
Signature	Date	

Attachment A/Data Tables

A.1 Groundwater Analytical Table(s)

A.2 Soil Analytical Results Table(s)

A.3 Residual Soil Contamination Table(s)

A.4 Vapor Analytical Table - No vapor samples were assessed as part of the site investigation.

A.5 Other Media of Concern (e.g., sediment or surface water) – No surface waters or sediments were assessed as part of the site investigation.

A.6 Water Level Elevations

A.7 Other – Natural Attenuation Data and Slug Test Calculations Data

A.1 Groundwater Analytical Table
(Geoprobe)
Keller Property BRRTS #02-38-560993

Sample ID	Date	GRO (ppb)	Benzene (ppb)	Ethyl Benzene (ppb)	MTBE (ppb)	Naph-thalene (ppb)	Toluene (ppb)	Trimethyl-benzenes (ppb)	Xylene (Total) (ppb)
G-1-W	05/18/15	NS	**209**	*267*	<24.5	**161**	76	**558**	*450-483*
G-2-W	05/18/15	NS	<46	*440*	<49	<260	<39	**1013**	*770-836*
G-3-W	05/18/15	NS	*2.46*	11.8	<0.48	*18.2*	7.1	*130*	58.1
G-4-W	05/18/15	NS	*1.64*	3.2	<0.49	9.1	5.5	*207*	122.6
G-5-W	05/18/15	NS	<4.6	72	<4.9	*47*	9.1	*428*	233.1
G-6-W	05/18/15	NS	*4.9*	23.7	<0.49	8.3	5.0	*137.7*	37.5
G-7-W	05/18/15	NS	*4.4*	86	<2.45	*98*	12.3	*336*	302
G-8-W	05/19/15	NS	*2.61*	34	<0.49	8.1	5.1	*103.2*	34
G-9-W	05/19/15	NS	<0.46	<0.73	<0.49	<2.6	<0.39	<1.51	<2.06
G-10-W	05/19/15	NS	<0.46	<0.73	<0.49	<2.6	<0.39	<1.51	<2.06
G-11-W	05/19/15	NS	<0.46	<0.73	<0.49	<2.6	<0.39	<1.51	<2.06
G-12-W	05/19/15	NS	<0.46	<0.73	<0.49	<2.6	<0.39	<1.51	<2.06
G-13-W	05/19/15	NS	<0.46	<0.73	<0.49	<2.6	<0.39	<1.51	<2.06
G-14-W	05/19/15	NS	<0.46	<0.73	<0.49	<2.6	<0.39	<1.51	<2.06
G-15-W	05/19/15	NS	<0.46	<0.73	<0.49	<2.6	<0.39	<1.51	<2.06
G-16-W	05/19/15	NS	<0.46	0.91	<0.49	<2.6	<0.39	<1.51	4.94
G-17-W	05/19/15	NS	**19.9**	9.4	<4.9	<26	8.2	*112.8*	71-137
G-18-W	05/19/15	NS	*2.69*	6.9	<0.49	7.5	6.3	72.5	17.5
G-19-W	05/19/15	NS	<23	*185*	<24.5	**165**	36	**490**	*932*
G-20-W	05/19/15	NS	<0.46	<0.73	<0.49	<2.6	<0.39	<1.51	<2.06
G-21-W	05/19/15	NS	<0.46	<0.73	<0.49	<2.6	<0.39	<1.51	<2.06
G-22-W	05/19/15	NS	<0.46	<0.73	<0.49	<2.6	<0.39	<1.51	<2.06
G-23-W	05/19/15	NS	<0.46	<0.73	<0.49	<2.6	<0.39	<1.51	<2.06
ENFORCE MENT STANDARD ES = Bold		**-**	**5**	**700**	**60**	**100**	**800**	**480**	**2000**
PREVENTIVE ACTION LIMIT PAL =		-	*0.5*	*140*	*12*	*10*	*160*	*96*	*400*

NS = Not Sampled
(ppb) = parts per billion (ppm) = parts per million
DRO = Diesel Range Organics
GRO = Gasoline Range Organics

A.1 Groundwater Analytical Table
Keller Property BRRTS #02-38-560993

Well MW-1 Resurveyed 1-8-18 584.51
PVC Elevation = 583.51 (feet) (MSL)

Date	Water Elevation (in feet msl)	Depth to water from top of PVC (in feet)	Lead (ppb)	Benzene (ppb)	Ethyl Benzene (ppb)	MTBE (ppb)	Naph-thalene (ppb)	Toluene (ppb)	Trimethyl-benzenes (ppb)	Xylene (Total) (ppb)
01/20/16	579.63	3.88	1.2	**30.2**	*370*	<22	**116**	<8.8	**500**	*520-538*
04/11/17	580.40	3.11	NS	**25**	*166*	<16.4	*28.7*	<13.4	*292*	271-278.8
10/10/17	580.80	3.71	NS	**18.5**	*200*	<4.3	*50.0*	8.5	*353*	242-248.1
01/08/18	580.11	4.40	NS	**28.6**	*315*	<5.7	*82.0*	9.9	*456*	*410-415.8*
ENFORCE MENT STANDARD **ES = Bold**			**15**	**5**	**700**	**60**	**100**	**800**	**480**	**2000**
PREVENTIVE ACTION LIMIT *PAL = Italics*			*1.5*	*0.5*	*140*	*12*	*10*	*160*	*96*	*400*

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

Well MW-2 Resurveyed 1-8-18 584.26
PVC Elevation = 583.28 (feet) (MSL)

Date	Water Elevation (in feet msl)	Depth to water from top of PVC (in feet)	Lead (ppb)	Benzene (ppb)	Ethyl Benzene (ppb)	MTBE (ppb)	Naph-thalene (ppb)	Toluene (ppb)	Trimethyl-benzenes (ppb)	Xylene (Total) (ppb)
01/20/16	579.67	3.61	<0.7	0.49	4.4	<1.1	4.5	<0.44	39.9	22.67
04/11/17	580.42	2.86	NS	<0.17	1.62	<0.82	0.207	<0.67	6.07	3.8-4.19
10/10/17	580.74	3.52	NOT SAMPLED							
01/08/18	580.11	4.15	NOT SAMPLED							
ENFORCE MENT STANDARD **ES = Bold**			**15**	**5**	**700**	**60**	**100**	**800**	**480**	**2000**
PREVENTIVE ACTION LIMIT *PAL = Italics*			*1.5*	*0.5*	*140*	*12*	*10*	*160*	*96*	*400*

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

Well MW-3 Resurveyed 1-8-18 584.28
PVC Elevation = 583.30 (feet) (MSL)

Date	Water Elevation (in feet msl)	Depth to water from top of PVC (in feet)	Lead (ppb)	Benzene (ppb)	Ethyl Benzene (ppb)	MTBE (ppb)	Naph-thalene (ppb)	Toluene (ppb)	Trimethyl-benzenes (ppb)	Xylene (Total) (ppb)
01/20/16	579.60	3.70	<0.7	<0.44	<0.71	<1.3	<1.6	<0.44	<3.1	<3.1
04/11/17	580.43	2.87	NS	0.33	15.7	<0.82	2.06	2.09	9.3-10.21	3.7-4.09
10/10/17	580.75	3.53	NOT SAMPLED							
01/08/18	580.15	4.13	NOT SAMPLED							
ENFORCE MENT STANDARD **ES = Bold**			**15**	**5**	**700**	**60**	**100**	**800**	**480**	**2000**
PREVENTIVE ACTION LIMIT *PAL = Italics*			*1.5*	*0.5*	*140*	*12*	*10*	*160*	*96*	*400*

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

A.1 Groundwater Analytical Table
Keller Property BRRTS #02-38-560993

Well MW-4 Resurveyed 1-8-18 584.75
PVC Elevation = 583.81 (feet) (MSL)

Date	Water Elevation (in feet msl)	Depth to water from top of PVC (in feet)	Lead (ppb)	Benzene (ppb)	Ethyl Benzene (ppb)	MTBE (ppb)	Naph-thalene (ppb)	Toluene (ppb)	Trimethyl-benzenes (ppb)	Xylene (Total) (ppb)
01/20/16	579.62	4.19	<0.7	*1.4*	10	<1.1	*19.9*	1.2	24.2	10.1-11
04/11/17	580.44	3.37	NS	*4.1*	8.7	<0.82	0.90	1.74	19.86	27.01
10/10/17	580.92	3.83	NOT SAMPLED							
01/08/18	580.13	4.62	NOT SAMPLED							
ENFORCE MENT STANDARD **ES = Bold**			**15**	**5**	**700**	**60**	**100**	**800**	**480**	**2000**
PREVENTIVE ACTION LIMIT *PAL = Italics*			*1.5*	*0.5*	*140*	*12*	*10*	*160*	*96*	*400*

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

Well MW-5 Resurveyed 1-8-18 584.29
PVC Elevation = 583.33 (feet) (MSL)

Date	Water Elevation (in feet msl)	Depth to water from top of PVC (in feet)	Lead (ppb)	Benzene (ppb)	Ethyl Benzene (ppb)	MTBE (ppb)	Naph-thalene (ppb)	Toluene (ppb)	Trimethyl-benzenes (ppb)	Xylene (Total) (ppb)
01/20/16	579.64	3.69	<0.7	<0.44	<0.71	<1.1	<1.6	<0.44	<3.1	<3.1
04/11/17	580.42	2.91	NS	<0.17	<0.2	<0.82	0.067	<0.67	<2.05	<1.95
10/10/17	580.79	3.50	NOT SAMPLED							
01/08/18	580.16	4.13	NOT SAMPLED							
ENFORCE MENT STANDARD **ES = Bold**			**15**	**5**	**700**	**60**	**100**	**800**	**480**	**2000**
PREVENTIVE ACTION LIMIT *PAL = Italics*			*1.5*	*0.5*	*140*	*12*	*10*	*160*	*96*	*400*

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

Well MW-6 Resurveyed 1-8-18 584.92
PVC Elevation = 583.88 (feet) (MSL)

Date	Water Elevation (in feet msl)	Depth to water from top of PVC (in feet)	Lead (ppb)	Benzene (ppb)	Ethyl Benzene (ppb)	MTBE (ppb)	Naph-thalene (ppb)	Toluene (ppb)	Trimethyl-benzenes (ppb)	Xylene (Total) (ppb)
01/20/16	579.72	4.16	<0.7	<0.44	<0.71	<1.1	<1.6	<0.44	<3.1	<3.1
04/11/17	580.40	3.48	NS	*0.69*	<0.2	<0.82	0.078	<0.67	<2.05	<1.95
10/10/17	580.81	4.11	NOT SAMPLED							
01/08/18	580.10	4.82	NOT SAMPLED							
ENFORCE MENT STANDARD **ES = Bold**			**15**	**5**	**700**	**60**	**100**	**800**	**480**	**2000**
PREVENTIVE ACTION LIMIT *PAL = Italics*			*1.5*	*0.5*	*140*	*12*	*10*	*160*	*96*	*400*

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

A.1 Groundwater Analytical Table
Keller Property BRRTS #02-38-560993

Well TW-1

Date	Water Elevation (in feet msl)	Depth to water from top of PVC (in feet)	Lead (ppb)	Benzene (ppb)	Ethyl Benzene (ppb)	MTBE (ppb)	Naph-thalene (ppb)	Toluene (ppb)	Trimethyl-benzenes (ppb)	Xylene (Total) (ppb)
08/21/13	NS	NS	NS	<0.30	1.4	<0.40	1.2	<0.30	24.6	3.4
ENFORCE MENT STANDARD **ES = Bold**			**15**	**5**	**700**	**60**	**100**	**800**	**480**	**2000**
PREVENTIVE ACTION LIMIT *PAL = Italics*			*1.5*	*0.5*	*140*	*12*	*10*	*160*	*96*	*400*

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

Well TW-2

Date	Water Elevation (in feet msl)	Depth to water from top of PVC (in feet)	Lead (ppb)	Benzene (ppb)	Ethyl Benzene (ppb)	MTBE (ppb)	Naph-thalene (ppb)	Toluene (ppb)	Trimethyl-benzenes (ppb)	Xylene (Total) (ppb)
08/21/13	NS	NS	NS	*0.77*	1.8	<0.40	1.1	0.45	14.9	7.9
ENFORCE MENT STANDARD **ES = Bold**			**15**	**5**	**700**	**60**	**100**	**800**	**480**	**2000**
PREVENTIVE ACTION LIMIT *PAL = Italics*			*1.5*	*0.5*	*140*	*12*	*10*	*160*	*96*	*400*

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

Well TW-3

Date	Water Elevation (in feet msl)	Depth to water from top of PVC (in feet)	Lead (ppb)	Benzene (ppb)	Ethyl Benzene (ppb)	MTBE (ppb)	Naph-thalene (ppb)	Toluene (ppb)	Trimethyl-benzenes (ppb)	Xylene (Total) (ppb)
08/21/13	NS	NS	NS	<0.30	<0.30	<0.40	<0.30	<0.30	<0.40	<0.60
ENFORCE MENT STANDARD **ES = Bold**			**15**	**5**	**700**	**60**	**100**	**800**	**480**	**2000**
PREVENTIVE ACTION LIMIT *PAL = Italics*			*1.5*	*0.5*	*140*	*12*	*10*	*160*	*96*	*400*

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

A.1 Groundwater Analytical Table
Keller Property BRRTS #02-38-560993

Well TW-4

Date	Water Elevation (in feet msl)	Depth to water from top of PVC (in feet)	Lead (ppb)	Benzene (ppb)	Ethyl Benzene (ppb)	MTBE (ppb)	Naph-thalene (ppb)	Toluene (ppb)	Trimethyl-benzenes (ppb)	Xylene (Total) (ppb)
08/21/13	NS	NS	NS	<0.30	<0.30	<0.40	<0.30	<0.30	<0.40	<0.60
ENFORCE MENT STANDARD **ES = Bold**			**15**	**5**	**700**	**60**	**100**	**800**	**480**	**2000**
PREVENTIVE ACTION LIMIT *PAL = Italics*			*1.5*	*0.5*	*140*	*12*	*10*	*160*	*96*	*400*

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

Well FD2 (TW1)

Date	Water Elevation (in feet msl)	Depth to water from top of PVC (in feet)	Lead (ppb)	Benzene (ppb)	Ethyl Benzene (ppb)	MTBE (ppb)	Naph-thalene (ppb)	Toluene (ppb)	Trimethyl-benzenes (ppb)	Xylene (Total) (ppb)
08/21/13	NS	NS	NS	<0.30	1.2	<0.40	0.99	<0.30	23.1	2.9
ENFORCE MENT STANDARD **ES = Bold**			**15**	**5**	**700**	**60**	**100**	**800**	**480**	**2000**
PREVENTIVE ACTION LIMIT *PAL = Italics*			*1.5*	*0.5*	*140*	*12*	*10*	*160*	*96*	*400*

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

Well TW-24

Date	Water Elevation (in feet msl)	Depth to water from top of PVC (in feet)	Lead (ppb)	Benzene (ppb)	Ethyl Benzene (ppb)	MTBE (ppb)	Naph-thalene (ppb)	Toluene (ppb)	Trimethyl-benzenes (ppb)	Xylene (Total) (ppb)
04/11/17	NM	1.54	NS	<0.17	<0.2	<0.82	0.152	<0.67	<2.05	<1.95
10/10/17	NM	1.19	NOT SAMPLED							
01/08/18	NM	1.96	NOT SAMPLED							
ENFORCE MENT STANDARD **ES = Bold**			**15**	**5**	**700**	**60**	**100**	**800**	**480**	**2000**
PREVENTIVE ACTION LIMIT *PAL = Italics*			*1.5*	*0.5*	*140*	*12*	*10*	*160*	*96*	*400*

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

A.1 Groundwater Analytical Table
(PAH)
Keller Property BRRTS #02-38-560993

Well MW-1

Date	Ace-naphthene (ppb)	Acenaph-thylene (ppb)	Anthracene (ppb)	Benzo(a) anthracene (ppb)	Benzo(a) pyrene (ppb)	Benzo(b) fluoranthene (ppb)	Benzo(g,h,I) Perylene (ppb)	Benzo(k) fluoranthene (ppb)	Chrysene (ppb)	Dibenzo(a,h) anthracene (ppb)	Fluoran-thene (ppb)	Fluorene (ppb)	Indeno(1,2,3-cd) pyrene (ppb)	1-Methyl-naphthalene (ppb)	2-Methyl-naphthalene (ppb)	Naph-thalene (ppb)	Phenan-threne (ppb)	Pyrene (ppb)
01/20/16	0.294	<0.21	<0.2	0.211	<0.19	<0.19	<0.24	<0.18	<0.17	<0.25	0.187	0.37	<0.18	29.2	53	*66*	0.39	0.18
04/11/17	<0.16	<0.19	<0.19	<0.17	<0.2	<0.18	<0.25	<0.16	<0.2	<0.25	<0.17	0.288	<0.23	20.0	39.0	*28.7*	0.278	<0.2
10/10/17	0.39	0.21	<0.19	0.228	<0.20	<0.18	<0.25	<0.16	<0.20	<0.25	0.35	0.61	<0.23	26.6	60.0	*50.0*	1.30	0.301
01/08/18	0.32	<0.19	<0.19	0.186	<0.2	<0.18	<0.25	<0.16	<0.2	<0.25	0.274	0.46	<0.23	30.2	53.0	*82.0*	0.92	0.212
ENFORCE MENT STANDARD = **ES – Bold**			**3000**	-	**0.2**	**0.2**	-	-	**0.2**	-	**400**	**400**	-	-	-	**100**	-	**250**
PREVENTIVE ACTION LIMIT = *PAL - Italics*			*600*	-	*0.02*	*0.02*	-	-	*0.02*	-	*80*	*80*	-	-	-	*10*	-	*50*

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

Well MW-2

Date	Ace-naphthene (ppb)	Acenaph-thylene (ppb)	Anthracene (ppb)	Benzo(a) anthracene (ppb)	Benzo(a) pyrene (ppb)	Benzo(b) fluoranthene (ppb)	Benzo(g,h,I) Perylene (ppb)	Benzo(k) fluoranthene (ppb)	Chrysene (ppb)	Dibenzo(a,h) anthracene (ppb)	Fluoran-thene (ppb)	Fluorene (ppb)	Indeno(1,2,3-cd) pyrene (ppb)	1-Methyl-naphthalene (ppb)	2-Methyl-naphthalene (ppb)	Naph-thalene (ppb)	Phenan-threne (ppb)	Pyrene (ppb)
01/20/16	<0.02	<0.021	<0.02	0.029	<0.019	*0.032*	<0.024	<0.018	*0.027*	<0.025	0.036	<0.017	<0.018	0.233	0.036	0.203	0.017	0.035
04/11/17	<0.016	0.032	0.0243	0.059	*0.051*	*0.104*	0.054	0.033	*0.053*	<0.025	0.125	<0.021	0.039	0.33	0.145	0.207	0.072	0.10
10/10/17	NOT SAMPLED																	
01/08/18	NOT SAMPLED																	
ENFORCE MENT STANDARD = **ES – Bold**			**3000**	-	**0.2**	**0.2**	-	-	**0.2**	-	**400**	**400**	-	-	-	**100**	-	**250**
PREVENTIVE ACTION LIMIT = *PAL - Italics*			*600*	-	*0.02*	*0.02*	-	-	*0.02*	-	*80*	*80*	-	-	-	*10*	-	*50*

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

Well MW-3

Date	Ace-naphthene (ppb)	Acenaph-thylene (ppb)	Anthracene (ppb)	Benzo(a) anthracene (ppb)	Benzo(a) pyrene (ppb)	Benzo(b) fluoranthene (ppb)	Benzo(g,h,I) Perylene (ppb)	Benzo(k) fluoranthene (ppb)	Chrysene (ppb)	Dibenzo(a,h) anthracene (ppb)	Fluoran-thene (ppb)	Fluorene (ppb)	Indeno(1,2,3-cd) pyrene (ppb)	1-Methyl-naphthalene (ppb)	2-Methyl-naphthalene (ppb)	Naph-thalene (ppb)	Phenan-threne (ppb)	Pyrene (ppb)
01/20/16	<0.02	<0.021	<0.02	0.226	<0.19	**0.201**	<0.24	<0.18	<0.17	<0.25	0.32	<0.17	<0.18	0.53	0.57	1.02	0.34	0.266
04/11/17	<0.16	<0.19	<0.19	0.18	<0.2	<0.18	<0.25	<0.16	<0.2	<0.25	0.28	<0.21	<0.23	0.58	<0.24	2.06	0.259	<0.2
10/10/17	NOT SAMPLED																	
01/08/18	NOT SAMPLED																	
ENFORCE MENT STANDARD = **ES – Bold**			**3000**	-	**0.2**	**0.2**	-	-	**0.2**	-	**400**	**400**	-	-	-	**100**	-	**250**
PREVENTIVE ACTION LIMIT = *PAL - Italics*			*600*	-	*0.02*	*0.02*	-	-	*0.02*	-	*80*	*80*	-	-	-	*10*	-	*50*

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

A.1 Groundwater Analytical Table
(PAH)
Keller Property BRRTS #02-38-560993

Well MW-4

Date	Ace-naphthene (ppb)	Acenaph-thylene (ppb)	Anthracene (ppb)	Benzo(a) anthracene (ppb)	Benzo(a) pyrene (ppb)	Benzo(b) fluoranthene (ppb)	Benzo(g,h,I) Perylene (ppb)	Benzo(k) fluoranthene (ppb)	Chrysene (ppb)	Dibenzo(a,h) anthracene (ppb)	Fluoran-thene (ppb)	Fluorene (ppb)	Indeno(1,2,3-cd) pyrene (ppb)	1-Methyl-naphthalene (ppb)	2-Methyl-naphthalene (ppb)	Naph-thalene (ppb)	Phenan-threne (ppb)	Pyrene (ppb)
01/20/16	4.7	0.43	3.4	1.98	**1.03**	**1.96**	0.84	0.78	1.9	<0.25	6.9	3.8	0.59	9.7	3.7	*18.1*	8.4	5.7
04/11/17	0.91	<0.19	0.283	0.222	<0.2	<0.18	<0.25	<0.16	<0.2	<0.25	0.65	0.65	<0.23	2.57	<0.24	0.90	1.27	0.45
10/10/17	NOT SAMPLED																	
01/08/18	NOT SAMPLED																	
ENFORCE MENT STANDARD = ES – Bold			**3000**	-	**0.2**	**0.2**	-	-	**0.2**	-	**400**	**400**	-	-	-	**100**	-	**250**
PREVENTIVE ACTION LIMIT = *PAL - Italics*			*600*	-	*0.02*	*0.02*	-	-	*0.02*	-	*80*	*80*	-	-	-	*10*	-	*50*

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

Well MW-5

Date	Ace-naphthene (ppb)	Acenaph-thylene (ppb)	Anthracene (ppb)	Benzo(a) anthracene (ppb)	Benzo(a) pyrene (ppb)	Benzo(b) fluoranthene (ppb)	Benzo(g,h,I) Perylene (ppb)	Benzo(k) fluoranthene (ppb)	Chrysene (ppb)	Dibenzo(a,h) anthracene (ppb)	Fluoran-thene (ppb)	Fluorene (ppb)	Indeno(1,2,3-cd) pyrene (ppb)	1-Methyl-naphthalene (ppb)	2-Methyl-naphthalene (ppb)	Naph-thalene (ppb)	Phenan-threne (ppb)	Pyrene (ppb)
01/20/16	<0.02	<0.021	0.026	0.047	*0.027*	*0.051*	0.030	0.027	*0.048*	<0.025	0.063	<0.017	0.026	0.029	0.030	0.035	0.043	0.056
04/11/17	<0.016	0.023	0.037	0.102	*0.075*	*0.136*	0.061	0.046	*0.084*	<0.025	0.179	<0.021	0.049	0.028	0.034	0.067	0.105	0.16
10/10/17	NOT SAMPLED																	
01/08/18	NOT SAMPLED																	
ENFORCE MENT STANDARD = ES – Bold			**3000**	-	**0.2**	**0.2**	-	-	**0.2**	-	**400**	**400**	-	-	-	**100**	-	**250**
PREVENTIVE ACTION LIMIT = *PAL - Italics*			*600*	-	*0.02*	*0.02*	-	-	*0.02*	-	*80*	*80*	-	-	-	*10*	-	*50*

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

Well MW-6

Date	Ace-naphthene (ppb)	Acenaph-thylene (ppb)	Anthracene (ppb)	Benzo(a) anthracene (ppb)	Benzo(a) pyrene (ppb)	Benzo(b) fluoranthene (ppb)	Benzo(g,h,I) Perylene (ppb)	Benzo(k) fluoranthene (ppb)	Chrysene (ppb)	Dibenzo(a,h) anthracene (ppb)	Fluoran-thene (ppb)	Fluorene (ppb)	Indeno(1,2,3-cd) pyrene (ppb)	1-Methyl-naphthalene (ppb)	2-Methyl-naphthalene (ppb)	Naph-thalene (ppb)	Phenan-threne (ppb)	Pyrene (ppb)
01/20/16	<0.02	<0.021	<0.02	0.044	*0.039*	*0.060*	0.039	0.030	*0.046*	<0.025	0.052	<0.017	0.030	0.021	0.025	0.041	0.034	0.051
04/11/17	<0.016	0.0215	<0.019	0.076	*0.069*	*0.132*	0.072	0.039	*0.068*	<0.025	0.133	<0.021	0.054	0.0312	0.034	0.078	0.086	0.111
10/10/17	NOT SAMPLED																	
01/08/18	NOT SAMPLED																	
ENFORCE MENT STANDARD = ES – Bold			**3000**	-	**0.2**	**0.2**	-	-	**0.2**	-	**400**	**400**	-	-	-	**100**	-	**250**
PREVENTIVE ACTION LIMIT = *PAL - Italics*			*600*	-	*0.02*	*0.02*	-	-	*0.02*	-	*80*	*80*	-	-	-	*10*	-	*50*

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

A.1 Groundwater Analytical Table
(PAH)
Keller Property BRRTS #02-38-560993

Well TW-1

Date	Ace-naphthene (ppb)	Acenaph-thylene (ppb)	Anthracene (ppb)	Benzo(a) anthracene (ppb)	Benzo(a) pyrene (ppb)	Benzo(b) fluoranthene (ppb)	Benzo(g,h,I) Perylene (ppb)	Benzo(k) fluoranthene (ppb)	Chrysene (ppb)	Dibenzo(a,h) anthracene (ppb)	Fluoran-thene (ppb)	Fluorene (ppb)	Indeno(1,2,3-cd) pyrene (ppb)	1-Methyl-naphthalene (ppb)	2-Methyl-naphthalene (ppb)	Naph-thalene (ppb)	Phenan-threne (ppb)	Pyrene (ppb)
08/21/13	<0.52	<0.52	<0.16	<0.017	<0.042	<0.031	<0.063	<0.019	<0.083	<0.094	<0.025	<0.27	<0.052	0.8	<0.52	<0.52	<0.11	<0.13
ENFORCE MENT STANDARD = ES – **Bold**			**3000**	-	**0.2**	**0.2**	-	-	**0.2**	-	**400**	**400**	-	-	-	**100**	-	**250**
PREVENTIVE ACTION LIMIT = *PAL - Italics*			*600*	-	*0.02*	*0.02*	-	-	*0.02*	-	*80*	*80*	-	-	-	*10*	-	*50*

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

Well TW-2

Date	Ace-naphthene (ppb)	Acenaph-thylene (ppb)	Anthracene (ppb)	Benzo(a) anthracene (ppb)	Benzo(a) pyrene (ppb)	Benzo(b) fluoranthene (ppb)	Benzo(g,h,I) Perylene (ppb)	Benzo(k) fluoranthene (ppb)	Chrysene (ppb)	Dibenzo(a,h) anthracene (ppb)	Fluoran-thene (ppb)	Fluorene (ppb)	Indeno(1,2,3-cd) pyrene (ppb)	1-Methyl-naphthalene (ppb)	2-Methyl-naphthalene (ppb)	Naph-thalene (ppb)	Phenan-threne (ppb)	Pyrene (ppb)
08/21/13	<0.52	<0.52	<0.16	<0.016	<0.041	<0.031	<0.062	<0.019	<0.082	<0.093	<0.025	<0.27	<0.052	1.8	2	<0.52	<0.11	<0.12
ENFORCE MENT STANDARD = ES – **Bold**			**3000**	-	**0.2**	**0.2**	-	-	**0.2**	-	**400**	**400**	-	-	-	**100**	-	**250**
PREVENTIVE ACTION LIMIT = *PAL - Italics*			*600*	-	*0.02*	*0.02*	-	-	*0.02*	-	*80*	*80*	-	-	-	*10*	-	*50*

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

Well TW-3

Date	Ace-naphthene (ppb)	Acenaph-thylene (ppb)	Anthracene (ppb)	Benzo(a) anthracene (ppb)	Benzo(a) pyrene (ppb)	Benzo(b) fluoranthene (ppb)	Benzo(g,h,I) Perylene (ppb)	Benzo(k) fluoranthene (ppb)	Chrysene (ppb)	Dibenzo(a,h) anthracene (ppb)	Fluoran-thene (ppb)	Fluorene (ppb)	Indeno(1,2,3-cd) pyrene (ppb)	1-Methyl-naphthalene (ppb)	2-Methyl-naphthalene (ppb)	Naph-thalene (ppb)	Phenan-threne (ppb)	Pyrene (ppb)
08/21/13	<0.52	<0.52	<0.16	<0.016	<0.041	<0.031	<0.062	<0.019	<0.082	<0.093	<0.025	<0.27	<0.052	<0.52	<0.52	<0.52	<0.11	<0.12
ENFORCE MENT STANDARD = ES – **Bold**			**3000**	-	**0.2**	**0.2**	-	-	**0.2**	-	**400**	**400**	-	-	-	**100**	-	**250**
PREVENTIVE ACTION LIMIT = *PAL - Italics*			*600*	-	*0.02*	*0.02*	-	-	*0.02*	-	*80*	*80*	-	-	-	*10*	-	*50*

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

A.1 Groundwater Analytical Table
(PAH)
Keller Property BRRTS #02-38-560993

Well TW-4

Date	Ace-naphthene (ppb)	Acenaph-thylene (ppb)	Anthracene (ppb)	Benzo(a) anthracene (ppb)	Benzo(a) pyrene (ppb)	Benzo(b) fluoranthene (ppb)	Benzo(g,h,I) Perylene (ppb)	Benzo(k) fluoranthene (ppb)	Chrysene (ppb)	Dibenzo(a,h) anthracene (ppb)	Fluoran-thene (ppb)	Fluorene (ppb)	Indeno(1,2,3-cd) pyrene (ppb)	1-Methyl-naphthalene (ppb)	2-Methyl-naphthalene (ppb)	Naph-thalene (ppb)	Phenan-threne (ppb)	Pyrene (ppb)
08/21/13	<0.52	<0.52	<0.16	<0.017	<0.042	<0.031	<0.063	<0.019	<0.083	<0.094	<0.025	<0.27	<0.052	<0.52	<0.52	<0.52	<0.11	<0.13
ENFORCE MENT STANDARD = **ES – Bold**			**3000**	-	**0.2**	**0.2**	-	-	**0.2**	-	**400**	**400**	-	-	-	**100**	-	**250**
PREVENTIVE ACTION LIMIT = *PAL - Italics*			*600*	-	*0.02*	*0.02*	-	-	*0.02*	-	*80*	*80*	-	-	-	*10*	-	*50*

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

Well FD2 (TW1)

Date	Ace-naphthene (ppb)	Acenaph-thylene (ppb)	Anthracene (ppb)	Benzo(a) anthracene (ppb)	Benzo(a) pyrene (ppb)	Benzo(b) fluoranthene (ppb)	Benzo(g,h,I) Perylene (ppb)	Benzo(k) fluoranthene (ppb)	Chrysene (ppb)	Dibenzo(a,h) anthracene (ppb)	Fluoran-thene (ppb)	Fluorene (ppb)	Indeno(1,2,3-cd) pyrene (ppb)	1-Methyl-naphthalene (ppb)	2-Methyl-naphthalene (ppb)	Naph-thalene (ppb)	Phenan-threne (ppb)	Pyrene (ppb)
08/21/13	<0.52	<0.52	<0.16	<0.017	<0.042	<0.032	<0.063	<0.019	<0.084	<0.095	<0.025	<0.27	<0.052	0.63	<0.53	<0.53	<0.12	<0.13
ENFORCE MENT STANDARD = **ES – Bold**			**3000**	-	**0.2**	**0.2**	-	-	**0.2**	-	**400**	**400**	-	-	-	**100**	-	**250**
PREVENTIVE ACTION LIMIT = *PAL - Italics*			*600*	-	*0.02*	*0.02*	-	-	*0.02*	-	*80*	*80*	-	-	-	*10*	-	*50*

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

Well TW-24

Date	Ace-naphthene (ppb)	Acenaph-thylene (ppb)	Anthracene (ppb)	Benzo(a) anthracene (ppb)	Benzo(a) pyrene (ppb)	Benzo(b) fluoranthene (ppb)	Benzo(g,h,I) Perylene (ppb)	Benzo(k) fluoranthene (ppb)	Chrysene (ppb)	Dibenzo(a,h) anthracene (ppb)	Fluoran-thene (ppb)	Fluorene (ppb)	Indeno(1,2,3-cd) pyrene (ppb)	1-Methyl-naphthalene (ppb)	2-Methyl-naphthalene (ppb)	Naph-thalene (ppb)	Phenan-threne (ppb)	Pyrene (ppb)
04/11/17	<0.08	<0.095	<0.095	0.104	<0.1	*0.173*	<0.125	<0.08	<0.1	<0.125	0.154	<0.105	<0.115	<0.12	<0.12	0.152	<0.125	0.126
01/08/18	NOT SAMPLED																	
ENFORCE MENT STANDARD = **ES – Bold**			**3000**	-	**0.2**	**0.2**	-	-	**0.2**	-	**400**	**400**	-	-	-	**100**	-	**250**
PREVENTIVE ACTION LIMIT = *PAL - Italics*			*600*	-	*0.02*	*0.02*	-	-	*0.02*	-	*80*	*80*	-	-	-	*10*	-	*50*

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

A.1 Groundwater Analytical Table
Keller Property BRRTS #02-38-560993

Well Sampling Conducted on:	08/21/13	08/21/13	08/21/13	08/21/13	08/21/13	01/20/16	01/20/16	01/20/16	01/20/16	01/20/16	01/20/16		
VOC's												**ENFORCE MENT**	*PREVENTIVE ACTION*
Well Name	**TW-1**	**TW-2**	**TW-3**	**TW-4**	**FD2 (TW1)**	**MW-1**	**MW-2**	**MW-3**	**MW-4**	**MW-5**	**MW-6**	**STANDARD = ES – Bold**	*LIMIT = PAL - Italics*
Lead, dissolved/ppb	NS	NS	NS	NS	NS	1.2 "J"	< 0.7	< 0.7	< 0.7	< 0.7	< 0.7	**15**	*1.5*
Benzene/ppb	<0.30	*0.77*	<0.30	<0.30	<0.30	**30.2**	0.49 "J"	< 0.44	*1.4*	< 0.44	< 0.44	**5**	*0.5*
Bromobenzene/ppb	NS	NS	NS	NS	NS	< 9.599999	< 0.48	< 0.48	< 0.48	< 0.48	< 0.48	==	==
Bromodichloromethane/ppb	NS	NS	NS	NS	NS	< 9.2	< 0.46	< 0.46	< 0.46	< 0.46	< 0.46	**0.6**	*0.06*
Bromoform/ppb	NS	NS	NS	NS	NS	< 9.2	< 0.46	< 0.46	< 0.46	< 0.46	< 0.46	**4.4**	*0.44*
tert-Butylbenzene/ppb	NS	NS	NS	NS	NS	< 22	< 1.1	< 1.1	< 1.1	< 1.1	< 1.1	==	==
sec-Butylbenzene/ppb	1.1	0.64	<0.30	<0.30	1	< 24	< 1.2	< 1.2	3.3 "J"	< 1.2	< 1.2	==	==
n-Butylbenzene/ppb	2.6	1.5	<0.40	<0.40	2.6	< 20	2.32 "J"	< 1	3.5	< 1	< 1	==	==
Carbon Tetrachloride/ppb	NS	NS	NS	NS	NS	< 10.2	< 0.51	< 0.51	< 0.51	< 0.51	< 0.51	**5**	*0.5*
Chlorobenzene/ppb	NS	NS	NS	NS	NS	< 9.2	< 0.46	< 0.46	< 0.46	< 0.46	< 0.46	==	==
Chloroethane/ppb	<0.30	<0.30	<0.30	<0.30	<0.30	< 13	< 0.65	< 0.65	< 0.65	< 0.65	< 0.65	**400**	*80*
Chloroform/ppb	NS	NS	NS	NS	NS	< 8.6	< 0.43	< 0.43	< 0.43	< 0.43	< 0.43	**6**	*0.6*
Chloromethane/ppb	NS	NS	NS	NS	NS	< 38	< 1.9	< 1.9	< 1.9	< 1.9	< 1.9	**30**	*3*
2-Chlorotoluene/ppb	NS	NS	NS	NS	NS	< 8	< 0.4	< 0.4	< 0.4	< 0.4	< 0.4	==	==
4-Chlorotoluene/ppb	NS	NS	NS	NS	NS	< 12.6	< 0.63	< 0.63	< 0.63	< 0.63	< 0.63	==	==
1,2-Dibromo-3-chloropropane/ppb	NS	NS	NS	NS	NS	< 28	< 1.4	< 1.4	< 1.4	< 1.4	< 1.4	**0.2**	*0.02*
Dibromochloromethane/ppb	<0.30	<0.30	<0.30	<0.30	<0.30	< 9	< 0.45	< 0.45	< 0.45	< 0.45	< 0.45	**60**	*6*
1,4-Dichlorobenzene/ppb	NS	NS	NS	NS	NS	< 9.8	< 0.49	< 0.49	< 0.49	< 0.49	< 0.49	**75**	*15*
1,3-Dichlorobenzene/ppb	NS	NS	NS	NS	NS	< 10.4	< 0.52	< 0.52	< 0.52	< 0.52	< 0.52	**600**	*120*
1,2-Dichlorobenzene/ppb	NS	NS	NS	NS	NS	< 9.2	< 0.46	< 0.46	< 0.46	< 0.46	< 0.46	**600**	*60*
Dichlorodifluoromethane/ppb	NS	NS	NS	NS	NS	< 17.4	< 0.87	< 0.87	< 0.87	< 0.87	< 0.87	**1000**	*200*
1,2-Dichloroethane/ppb	<0.30	<0.30	<0.30	<0.30	<0.30	< 9.599999	< 0.48	< 0.48	< 0.48	< 0.48	< 0.48	**5**	*0.5*
1,1-Dichloroethane/ppb	<0.30	<0.30	<0.30	<0.30	<0.30	< 22	< 1.1	< 1.1	< 1.1	< 1.1	< 1.1	**850**	*85*
1,1-Dichloroethene/ppb	<0.24	<0.24	<0.24	<0.24	<0.24	< 13	< 0.65	< 0.65	< 0.65	< 0.65	< 0.65	**7**	*0.7*
cis-1,2-Dichloroethene/ppb	<0.30	<0.30	<0.30	<0.30	<0.30	< 9	< 0.45	< 0.45	< 0.45	< 0.45	< 0.45	**70**	*7*
trans-1,2-Dichloroethene/ppb	<0.30	<0.30	<0.30	<0.30	<0.30	< 10.8	< 0.54	< 0.54	< 0.54	< 0.54	< 0.54	**100**	*20*
1,2-Dichloropropane/ppb	NS	NS	NS	NS	NS	< 8.6	< 0.43	< 0.43	< 0.43	< 0.43	< 0.43	**5**	*0.5*
2,2-Dichloropropane/ppb	NS	NS	NS	NS	NS	< 62	< 3.1	< 3.1	< 3.1	< 3.1	< 3.1	==	==
1,3-Dichloropropane/ppb	NS	NS	NS	NS	NS	< 8.4	< 0.42	< 0.42	< 0.42	< 0.42	< 0.42	==	==
Di-isopropyl ether/ppb	NS	NS	NS	NS	NS	< 8.8	< 0.44	< 0.44	< 0.44	< 0.44	< 0.44	==	==
EDB (1,2-Dibromoethane)/ppb	NS	NS	NS	NS	NS	< 12.6	< 0.63	< 0.63	< 0.63	< 0.63	< 0.63	**0.05**	*0.005*
Ethylbenzene/ppb	1.4	1.8	<0.30	<0.30	1.2	*370*	4.4	< 0.71	10	< 0.71	< 0.71	**700**	*140*
Hexachlorobutadiene/ppb	NS	NS	NS	NS	NS	< 44	< 2.2	< 2.2	< 2.2	< 2.2	< 2.2	==	==
Isopropylbenzene/ppb	1.9	1.5	<0.30	<0.30	1.7	32 "J"	2.17 "J"	2.1 "J"	8.8	< 0.82	< 0.82	==	==
p-Isopropyltoluene/ppb	2.1	1.1	<0.40	<0.40	2.2	< 22	2.92 "J"	< 1.1	1.99 "J"	< 1.1	< 1.1	==	==
Methylene chloride/ppb	0.84	0.57	<0.40	<0.40	0.6	< 26	< 1.3	< 1.3	< 1.3	< 1.3	< 1.3	**5**	*0.5*
Methyl tert-butyl ether (MTBE)/ppb	<0.40	<0.40	<0.40	<0.40	<0.40	< 22	< 1.1	< 1.1	< 1.1	< 1.1	< 1.1	**60**	*12*
Naphthalene/ppb	1.2	1.1	<0.30	<0.30	0.99	**116**	4.5 "J"	< 1.6	*19.9*	< 1.6	< 1.6	**100**	*10*
n-Propylbenzene/ppb	2.5	1.8	<0.40	<0.40	2.2	49	2.17 "J"	1.06 "J"	11.2	< 0.77	< 0.77	==	==
1,1,2,2-Tetrachloroethane/ppb	NS	NS	NS	NS	NS	< 10.4	< 0.52	< 0.52	< 0.52	< 0.52	< 0.52	**0.2**	*0.02*
1,1,1,2-Tetrachloroethane/ppb	NS	NS	NS	NS	NS	< 9.599999	< 0.48	< 0.48	< 0.48	< 0.48	< 0.48	**70**	*7*
Tetrachloroethene (PCE)/ppb	<0.29	<0.29	<0.29	<0.29	<0.29	< 9.8	< 0.49	< 0.49	< 0.49	< 0.49	< 0.49	**5**	*0.5*
Toluene/ppb	<0.30	0.45	<0.30	<0.30	<0.30	< 8.8	< 0.44	< 0.44	1.2 "J"	< 0.44	< 0.44	**800**	*160*
1,2,4-Trichlorobenzene/ppb	NS	NS	NS	NS	NS	< 34	< 1.7	< 1.7	< 1.7	< 1.7	< 1.7	**70**	*14*
1,2,3-Trichlorobenzene/ppb	NS	NS	NS	NS	NS	< 54	< 2.7	< 2.7	< 2.7	< 2.7	< 2.7	==	==
1,1,1-Trichloroethane/ppb	<0.29	<0.29	<0.29	<0.29	<0.29	< 16.8	< 0.84	< 0.84	< 0.84	< 0.84	< 0.84	**200**	*40*
1,1,2-Trichloroethane/ppb	<0.40	<0.40	<0.40	<0.40	<0.40	< 9.599999	< 0.48	< 0.48	< 0.48	< 0.48	< 0.48	**5**	*0.5*
Trichloroethene (TCE)/ppb	<0.50	<0.50	<0.50	<0.50	<0.50	< 9.4	< 0.47	< 0.47	< 0.47	< 0.47	< 0.47	**5**	*0.5*
Trichlorofluoromethane/ppb	<0.30	<0.30	<0.30	<0.30	<0.30	< 17.4	< 0.87	< 0.87	< 0.87	< 0.87	< 0.87	==	==
Total – Trimethylbenzens/ppb	24.6	14.9	<0.40	<0.40	23.1	NS	NS	NS	NS	NS	NS	**480**	**96**
1,2,4-Trimethylbenzene/ppb	NS	NS	NS	NS	NS	**400**	30.1	< 1.6	20.9	< 1.6	< 1.6		
1,3,5-Trimethylbenzene/ppb	NS	NS	NS	NS	NS	**100**	9.8	< 1.5	3.3 "J"	< 1.5	< 1.5	**Total TMB's 480**	*Total TMB's 96*
Vinyl Chloride/ppb	<0.18	<0.18	<0.18	<0.18	<0.18	< 3.4	< 0.17	< 0.17	< 0.17	< 0.17	< 0.17	**0.2**	*0.02*
Total Xylenes/ppb	3.4	7.9	<0.60	<0.60	2.9	NS	NS	NS	NS	NS	NS	**2000**	*400*
m&p-Xylene/ppb	NS	NS	NS	NS	NS	*520*	21.7	< 2.2	10.1	< 2.2	< 2.2		
o-Xylene/ppb	NS	NS	NS	NS	NS	< 18	0.97 "J"	< 0.9	< 0.9	< 0.9	< 0.9	**Total Xylenes 2000**	*Total Xylenes 400*

NS = not sampled, NM = Not Measured
Q = Analyte detected above laboratory method detection limit but below practical quantitation limit.
= = No Exceedences
(ppb) = parts per billion
(ppm) = parts per million
"J" Flag: Analyte detected between LOD and LOQ LOD Limit of Detection LOQ Limit of Quantitation

A.2. Soil Analytical Results Table
Keller Property BRRTS #02-38-560993

																DIRECT CONTACT PVOC & PAH COMBINED		
Sample ID	Depth (feet)	Saturation U/S	Date	PID	Lead (ppm)	DRO (ppm)	GRO (ppm)	Benzene (ppm)	Ethyl Benzene (ppm)	MTBE (ppm)	Naph-thalene (ppm)	Toluene (ppm)	1,2,4-Trime-thylbenzene (ppm)	1,3,5-Trime-thylbenzene (ppm)	Xylene (Total) (ppm)	Other VOC's (ppb)	Exeedance Count	Hazard Index	Cumulative Cancer Risk
SB1	0-2	U	08/21/13	2.8	NOT SAMPLED											NS	0		
SB1	2-4	U	08/21/13	3.8	NOT SAMPLED											NS	0		
SB1	4-6	S	08/21/13	397.0	NS	NS	NS	**0.0059**	**0.0048**	<0.013	**0.066**	0.024	0.760	0.260	0.177	SEE VOC SPREADSHEET			
SB1	6-8	S	08/21/13	>300	NOT SAMPLED											NS			
SB1	8-10	S	08/21/13	>300	NOT SAMPLED											NS			
SB1	10-12	S	08/21/13	>300	NOT SAMPLED											NS			
SB2	0-2	U	08/21/13	3.1	NOT SAMPLED											NS	0		
SB2	2-4	U	08/21/13	3.3	NOT SAMPLED											NS	0		
SB2	4-6	S	08/21/13	111.0	NS	NS	NS	**0.200**	**0.110**	<0.012	**0.290**	0.72	0.270	0.073	0.840	SEE VOC SPREADSHEET			
SB2	6-8	S	08/21/13	34.0	NOT SAMPLED											NS			
SB2	8-10	S	08/21/13	2.0	NOT SAMPLED											NS			
SB2	10-12	S	08/21/13	1.2	NOT SAMPLED											NS			
SB3	0-2	U	08/21/13	7.6	NOT SAMPLED											NS	0		
SB3	2-4	U	08/21/13	>300	NS	NS	NS	**3.4**	**7.2**	<0.280	**6.3**	**2.1**	**6.5**	**3.8**	**11.1**	SEE VOC SPREADSHEET	**2**	0.1307	4.2E-06
SB3	4-6	S	08/21/13	>300	NOT SAMPLED											NS			
SB3	6-8	S	08/21/13	>300	NOT SAMPLED											NS			
SB3	8-10	S	08/21/13	>300	NOT SAMPLED											NS			
SB3	10-12	S	08/21/13	>300	NOT SAMPLED											NS			
SB4	0-2	U	08/21/13	27.0	NOT SAMPLED											NS	0		
SB4	2-4	U	08/21/13	10.0	NOT SAMPLED											NS	0		
SB4	4-6	S	08/21/13	>300	NS	NS	NS	**0.110**	**0.450**	<0.017	**5.1**	**0.046**	**12**	**3.8**	**8.479**	SEE VOC SPREADSHEET			
SB4	6-8	S	08/21/13	109.0	NOT SAMPLED											NS			
SB4	8-10	S	08/21/13	52.0	NOT SAMPLED											NS			
SB4	10-12	S	08/21/13	10.0	NOT SAMPLED											NS			
SB5	0-2	U	08/21/13	7.7	NOT SAMPLED											NS	0		
SB5	2-4	U	08/21/13	4.3	NOT SAMPLED											NS	0		
SB5	4-6	S	08/21/13	9.4	NS	NS	NS	**0.011**	<14	<0.013	**0.066**	**0.065**	0.037	<0.016	0.087	SEE VOC SPREADSHEET			
SB5	6-8	S	08/21/13	>300	NOT SAMPLED											NS			
SB5	8-10	S	08/21/13	>300	NOT SAMPLED											NS			
SB5	10-12	S	08/21/13	24.0	NOT SAMPLED											NS			
SB6	0-2	U	08/21/13	4.0	NOT SAMPLED											NS	0		
SB6	2-4	U	08/21/13	3.4	NOT SAMPLED											NS	0		
SB6	4-6	S	08/21/13	7.5	NS	NS	NS	**0.032**	**0.045**	<0.013	**0.170**	**0.190**	0.130	0.028	0.370	SEE VOC SPREADSHEET			
SB6	6-8	S	08/21/13	2.5												NS			
SB6	8-10	S	08/21/13	2.7	NOT SAMPLED											NS			
SB6	10-12	S	08/21/13	3.2	NOT SAMPLED											NS			
SB7	0-2	U	08/21/13	2.0	NOT SAMPLED											NS	0		
SB7	2-4	U	08/21/13	2.2	NOT SAMPLED											NS	0		
SB7	4-6	S	08/21/13	4.2	NS	NS	NS	**0.0056**	<12	<0.011	**0.045**	**0.026**	**0.024**	<0.013	0.061	SEE VOC SPREAD – SHEET			
SB7	6-8	S	08/21/13	0.3	NOT SAMPLED											NS			
SB7	8-10	S	08/21/13	0.5	NOT SAMPLED											NS			
SB7	10-12	S	08/21/13	0.3	NOT SAMPLED											NS			
SB8	0-2	U	08/21/13	2.6	NS	NS	NS	**0.0072**	**0.032**	<0.014	**0.073**	0.048	0.1580	0.083	0.206	SEE VOC SPREADSHEET	0	0.0015	2.2E-08
SB8	2-4	U	08/21/13	0.8	NOT SAMPLED											NS	0		
SB8	4-6	S	08/21/13	0.9	NOT SAMPLED											NS			
SB8	6-8	S	08/21/13	0.5	NOT SAMPLED											NS			
SB8	8-10	S	08/21/13	0.0	NOT SAMPLED											NS			
SB8	10-12	S	08/21/13	0.0	NOT SAMPLED											NS			
Groundwater RCL					**27**	-	-	**0.00512**	**1.57**	**0.027**	**0.6582**	**1.11**	**1.38**		**3.96**	-			
Non-Industrial Direct Contact RCL					**400**	-	-	**1.6**	**8.02**	**63.8**	**5.52**	**818**	**219**	**182**	**260**	-		1.00E+00	1.00E-05
Industrial Direct Contact RCL					**(800)**	-	-	**(7.07)**	**(35.4)**	**(282)**	**(24.1)**	**(818)**	**(219)**	**(182)**	**(260)**	-		1.00E+00	1.00E-05
Soil Saturation Concentration (C-sat)*					-	-	-	**1820***	**480***	**8870***	-	**818***	**219***	**182***	**260***	-			

Bold = Groundwater RCL Exceedance
Bold & Underline = Non Industrial Direct Contact RCL Exceedance
(Bold & Parentheses) = Industrial Direct Contact RCL Exceedance
Bold & Asteric * = C-sat Exceedance
Italics = Industrial Direct Contact RCL
NS = Not Sampled
NM = Not Measured
(ppm) = parts per million
ND = No Detects
DRO = Diesel Range Organics
GRO = Gasoline Range Organics
PID = Photoionization Detector
PVOC's = Petroleum Volatile Organic Compounds
VOC's = Volatile Organic Compounds
Note: Non-Industrial RCLs apply to this site.

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

A.2. Soil Analytical Results Table
Keller Property BRRTS #02-38-560993

																DIRECT CONTACT PVOC & PAH COMBINED		
Sample ID	Depth (feet)	Saturation U/S	Date	PID	Lead (ppm)	DRO (ppm)	GRO (ppm)	Benzene (ppm)	Ethyl Benzene (ppm)	MTBE (ppm)	Naph-thalene (ppm)	Toluene (ppm)	1,2,4-Trime-thylbenzene (ppm)	1,3,5-Trime-thylbenzene (ppm)	Xylene (Total) (ppm)	Other VOC's (ppb)	Exeedance Count	Hazard Index	Cumulative Cancer Risk
G-1-1	3.5	U	05/18/15	300.0	**186.0**	NS	NS	**3.03**	**6.0**	<0.25	0.107	**2.94**	**12.7**	**9.9**	**16**	NS	**1**	0.58	2.7E-06
G-1-2	6.0	S	05/18/15	660.0	NS	NS	NS	**0.86**	**11.8**	<0.5	**18**	**4.1**	**44**	**21**	**35.3**	NS			
G-2-1	3.5	U	05/18/15	140.0	**72.7**	NS	NS	**0.115**	0.38	<0.025	<0.0203	0.291	**1.87**	**1.44**	2.08	NS	**1**	0.2063	2.7E-06
G-2-2	6.0	S	05/18/15	940.0	NS	NS	NS	**0.287**	**4.5**	<0.025	**4.0**	**1.16**	**14.6**	**5.0**	**9.29**	NS			
G-3-1	3.5	U	05/18/15	0.0	23.1	NS	NS	<0.025	<0.025	<0.025	<0.0203	0.034	<0.025	<0.025	<0.075	NS	0	0.0013	2.5E-07
G-3-2	6.0	S	05/18/15	1230.0	1.0	NS	NS	<0.16	<0.27	<0.25	<0.87	<0.31	**5.3**	**2.68**	1.02-1.31	NS			
G-4-1	3.5	U	05/18/15	0.0	**28.2**	NS	NS	<0.025	<0.025	<0.025	0.0209	<0.025	<0.025	<0.025	0.127	NS	**1**	0.0127	2.8E-06
G-4-2	6.0	S	05/18/15	870.0	NS	NS	NS	**0.144**	1.15	<0.025	**5.0**	**1.21**	**10**	**4.4**	**8.05**	NS			
G-5-1	0-4	U	05/18/15	NO RECOVERY												NS	0		
G-5-2	6.0	S	05/18/15	1130.0	NS	NS	NS	<0.5	**1.86**	<0.5	**8.9**	**2.25**	**15.7**	**7.1**	**14.7**	NS			
G-6-1	3.5	U	05/18/15	0.0	**361.0**	NS	NS	<0.025	<0.025	<0.025	0.078	0.093	0.101	0.048	0.249	NS	**2**	0.9149	3.6E-06
G-6-2	6.0	S	05/18/15	840.0	NS	NS	NS	**0.44**	1.27	<0.025	**3.12**	**2.06**	**1.3**	**2.19**	**4.96**	NS			
G-7-1	3.5	U	05/18/15	0.0	**65.2**	NS	NS	<0.025	0.11	<0.025	0.0233	0.154	**1.05**	**0.41**	1.39	NS	0	0.17	2.0E-07
G-7-2	7.0	S	05/18/15	315.0	NS	NS	NS	<1.25	**3.3**	<1.25	**18.7**	**1.63**	**4.5**	**14.6**	**13.5**	NS			
G-8-1	3.5	U	05/18/15	0.0	**186.0**	NS	NS	<0.025	<0.025	<0.025	0.149	<0.025	<0.025	<0.025	<0.075	NS	**1**	0.4974	6.9E-06
G-8-2	8.0	S	05/18/15	525.0	NS	NS	NS	<1.25	**5.9**	<1.25	**37**	**7.7**	**51**	**46**	**53.3**	NS			
G-9-1	3.5	U	05/19/15	0.0	**99.1**	NS	NS	<0.025	0.104	<0.025	0.44	0.064	<0.025	<0.025	0.533	NS	**1**	0.2642	2.6E-06
G-9-2	8.0	S	05/19/15	0.0	NS	NS	NS	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.075	NS			
G-10-1	COULD NOT ACCESS – LOW MARSH AREA															NS			
G-11-1	3.5	U	05/19/15	0.0	NOT SAMPLED											NS	0		
G-11-2	8.0	S	05/19/15	0.0	NOT SAMPLED											NS			
G-12-1	3.5	U	05/19/15	0.0	NOT SAMPLED											NS	0		
G-12-2	8.0	S	05/19/15	0.0	NOT SAMPLED											NS			
G-13-1	3.5	U	05/19/15	0.0	NOT SAMPLED											NS	0		
G-13-2	8.0	S	05/19/15	0.0	NOT SAMPLED											NS			
G-14-1	3.5	U	05/19/15	0.0	NOT SAMPLED											NS	0		
G-14-2	8.0	S	05/19/15	0.0	NOT SAMPLED											NS			
G-15-1	3.5	U	05/19/15	0.0	**148.0**	NS	NS	<0.025	<0.025	<0.025	<0.203	0.060	0.043	0.038	0.15	NS	**5**	0.9063	1.2E-04
G-15-2	4-8	S	05/19/15	NO RECOVERY												NS			
G-16-1	3.5	U	05/19/15	0.0	**43.0**	NS	NS	<0.025	<0.025	<0.025	<0.0203	<0.025	<0.025	<0.025	0.13	NS	0	0.0002	
G-16-2	6.0	S	05/19/15	0.0	NS	NS	NS	<0.025	<0.025	<0.025	<0.025	0.086	<0.025	<0.025	0.0885	NS			
G-17-1	3.5	U	05/19/15	0.0	**119.0**	NS	NS	**0.101**	0.66	<0.025	0.47	**1.53**	**1.17**	**0.51**	3.58	NS	**1**	0.3319	4.0E-06
G-17-2	6.0	S	05/19/15	180.0	NS	NS	NS	**0.043**	0.292	<0.025	0.47	0.264	**2.5**	**1.34**	1.49	NS			
G-18-1	3.5	U	05/19/15	0.0	**254.0**	NS	NS	<0.025	0.059	<0.025	0.111	0.059	0.087	0.0309	0.235	NS	**1**	0.6535	3.7E-06
G-18-2	6.0	S	05/19/15	530.0	NS	NS	NS	**0.126**	1.4	<0.025	**4.7**	**3.2**	**24.9**	**2.3**	**8.4**	NS			
G-19-1	3.5	U	05/19/15	0.0	**175.0**	NS	NS	<0.025	0.039	<0.025	0.043	0.064	0.040	0.040	0.224	NS	**1**	0.464	5.7E-06
G-19-2	8.0	S	05/19/15	580.0	NS	NS	NS	**1.23**	**8.1**	<0.025	**10.6**	**7.4**	**45**	**19.6**	**45.4**	NS			
G-20-1	3.5	U	05/19/15	0.0	**60.6**	NS	NS	<0.025	<0.025	<0.025	<0.203	0.037	<0.025	0.041	0.043-0.048	NS	**2**	0.205	1.1E-05
G-20-2	8.0	S	05/19/15	0.0	NS	NS	NS	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.075	NS			
G-21-1	3.5	U	05/19/15	0.0	NOT SAMPLED											NS	0		
G-21-2	8.0	S	05/19/15	0.0	NOT SAMPLED											NS			
G-22-1	3.5	U	05/19/15	0.0	NOT SAMPLED											NS	0		
G-22-2	8.0	S	05/19/15	0.0	NOT SAMPLED											NS			
G-23-1	3.5	U	05/19/15	0.0	NOT SAMPLED											NS	0		
G-23-2	8.0	S	05/19/15	0.0	NOT SAMPLED											NS			
Groundwater RCL					**27**	-	-	**0.00512**	**1.57**	**0.027**	**0.6582**	**1.11**	**1.38**		**3.96**	-			
Non-Industrial Direct Contact RCL					**400**	-	-	**1.6**	**8.02**	**63.8**	**5.52**	**818**	**219**	**182**	**260**	-		1.00E+00	1.00E-05
Industrial Direct Contact RCL					**(800)**	-	-	**(7.07)**	**(35.4)**	**(282)**	**(24.1)**	**(818)**	**(219)**	**(182)**	**(260)**	-		1.00E+00	1.00E-05
Soil Saturation Concentration (C-sat)*					-	-	-	**1820***	**480***	**8870***	-	**818***	**219***	**182***	**260***	-			

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Bold & Underline = Non Industrial Direct Contact RCL Exceedance
(Bold & Parentheses) = Industrial Direct Contact RCL Exceedance
Bold & Asteric * = C-sat Exceedance
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NS = Not Sampled
NM = Not Measured
(ppm) = parts per million
ND = No Detects
DRO = Diesel Range Organics
GRO = Gasoline Range Organics
PID = Photoionization Detector
PVOC's = Petroleum Volatile Organic Compounds
VOC's = Volatile Organic Compounds
Note: Non-Industrial RCLs apply to this site.

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

A.2. Soil Analytical Results Table
Keller Property BRRTS #02-38-560993

Sample ID	Depth (feet)	Saturation U/S	Date	PID	Lead (ppm)	DRO (ppm)	GRO (ppm)	Benzene (ppm)	Ethyl Benzene (ppm)	MTBE (ppm)	Naph-thalene (ppm)	Toluene (ppm)	1,2,4-Trime-thylbenzene (ppm)	1,3,5-Trime-thylbenzene (ppm)	Xylene (Total) (ppm)	Other VOC's (ppb)	DIRECT CONTACT PVOC & PAH COMBINED: Exeedance Count	Hazard Index	Cumulative Cancer Risk
MW-1-1	3.5	U	11/23/15	1.8	**70.5**	NS	NS	**1.27**	**1.99**	<0.25	**2.39**	**3.8**	**6.2**	**6.0**	**8.9**	NS	**1**	0.2691	3.50E-06
MW-1-2	8.0	S	11/23/15	1975.0	NS	195	61	**0.04**	0.87	<0.025	0.37	0.141	**1.91**	**0.60**	1.553	<0.45 TCLP LEAD <0.05 TCLP BENZENE			
MW-1-3	12.0	S	11/23/15	32.0	NOT SAMPLED											NS			
MW-2-1	3.5	U	11/23/15	1.8	**54.8**	NS	NS	**0.048**	0.057	<0.025	0.059	0.219	0.112	0.080	0.334	NS	0	0.1431	8.4E-07
MW-2-2	8.0	S	11/23/15	495.0	NS	2080	3300	**0.62**	**6.3**	<0.5	**11.8**	**5.1**	**25**	**18**	**22.5**	NS			
MW-2-3	12.0	S	11/23/15	140.0	NOT SAMPLED											NS			
MW-3-1	3.5	U	11/23/15	0.9	**227.0**	NS	NS	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.075	NS	**1**	0.5792	2.4E-06
MW-3-2	8.0	S	11/23/15	1325.0	NOT SAMPLED											NS			
MW-3-3	12.0	S	11/23/15	1800.0	NOT SAMPLED											NS			
MW-4-1	3.5	U	11/23/15	0.9	**35.8**	NS	NS	<0.025	<0.025	<0.025	0.053	0.073	0.056	0.0281	0.138	NS	0	0.0055	1.1E-06
MW-4-2	8.0	S	11/23/15	2240.0	NOT SAMPLED											NS			
MW-4-3	12.0	S	11/23/15	5.3	NOT SAMPLED											NS			
MW-5-1	3.5	U	11/23/15	0.6	12.0	NS	NS	**0.196**	0.135	<0.025	0.119	0.65	0.257	0.085	0.85	NS	**4**	0.0745	1.6E-05
MW-5-2	8.0	S	11/23/15	0.6	NOT SAMPLED											NS			
MW-5-3	12.0	S	11/23/15	0.6	NOT SAMPLED											NS			
MW-6-1	3.5	U	11/23/15	1.1	**72.1**	NS	NS	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.075	NS	**1**	0.1885	1.8E-06
MW-6-2	8.0	S	11/23/15	19.3	NOT SAMPLED											NS			
MW-6-3	12.0	S	11/23/15	1.4	NOT SAMPLED											NS			
G-24-1	1.0	U	04/11/17	0.8	19.3	NS	NS	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.075	NS	0		
G-25-1	3.5	U	04/11/17	0.5	14.3	NS	NS	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.075	NS	0		
G-26-1	3.5	U	04/11/17	0.6	**62.7**	NS	NS	**0.117**	0.167	<0.025	0.34	0.75	0.32	0.105	1.17	NS	0	0.1625	1.6E-07
G-27-1	3.5	U	04/11/17	0.6	22.9	NS	NS	<0.025	<0.025	<0.025	0.049	0.046	<0.025	<0.025	0.095	NS	0	0.0004	8.9E-09
Groundwater RCL					**27**	-	-	**0.00512**	**1.57**	**0.027**	**0.6582**	**1.11**	**1.38**		**3.96**	-			
Non-Industrial Direct Contact RCL					**400**	-	-	**1.6**	**8.02**	**63.8**	**5.52**	**818**	**219**	**182**	**260**	-		1.00E+00	1.00E-05
Industrial Direct Contact RCL					**(800)**	-	-	**(7.07)**	**(35.4)**	**(282)**	**(24.1)**	**(818)**	**(219)**	**(182)**	**(260)**	-		1.00E+00	1.00E-05
Soil Saturation Concentration (C-sat)*					-	-	-	**1820***	**480***	**8870***	-	**818***	**219***	**182***	**260***	-			

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

U=UNSATURATED (BASED ON ALL TIME LOW WATER TABLE PER WDNR)
S=SATURATED (BASED ON ALL TIME LOW WATER TABLE PER WDNR)
NM = Not Measured
ND = No Detects

A.2. Soil Analytical Results Table
(PAH)
Keller Property BRRTS #02-38-560993

Sample	Depth (feet)	Saturation U/S	Date	Acenaph-thene (ppm)	Acenaph-thylene (ppm)	Anthracene (ppm)	Benzo(a) anthracene (ppm)	Benzo(a) pyrene (ppm)	Benzo(b) fluoranthene (ppm)	Benzo(g,h,I) perylene (ppm)	Benzo(k) fluoranthene (ppm)	Chrysene (ppm)	Dibenzo(a,h) anthracene (ppm)	Fluoranthene (ppm)	Fluorene (ppm)	Indeno(1,2,3-cd) pyrene (ppm)	1-Methyl-naphthalene (ppm)	2-Methyl-naphthalene (ppm)	Naph-thalene (ppm)	Phenan-threne (ppm)	Pyrene (ppm)	DIRECT CONTACT PVOC & PAH COMBINED		
																						Exeedance Count	Hazard Index	Cumulative Cancer Risk
SB1	4-6	S	08/21/13	<0.260	<0.130	<0.067	<0.0034	<0.010	<0.026	<0.045	<0.011	<0.029	<0.056	0.230	<0.090	<0.056	<0.120	<0.150	<0.120	0.180	0.480			
SB2	4-6	S	08/21/13	<0.260	<0.140	<0.068	0.086	0.120	<0.026	<0.045	<0.011	<0.029	<0.057	0.370	<0.091	<0.057	<0.120	<0.150	<0.120	<0.045	<0.024			
SB3	2-4	U	08/21/13	<5.700	<3	<1.500	<0.074	<0.220	<0.570	<0.990	<0.250	<0.640	<1.200	<0.350	<2	<1.200	<2.700	**4.5**	<2.700	9.4	<0.520	**2**	0.1307	4.2E-06
SB4	4-6	S	08/21/13	<1.800	<0.920	<0.460	0.410	<0.069	<0.180	<0.310	<0.077	<0.200	<0.380	3.1	0.620	<0.380	4.2	**2.4**	**6.2**	3.8	3.6			
SB5	4-6	S	08/21/13	<1.300	<0.700	<0.350	0.490	**0.440**	0.410	0.240	0.200	<0.150	<0.290	1.6	<0.470	<0.290	<0.650	<0.760	<0.650	0.960	0.920			
SB6	4-6	S	08/21/13	<0.280	<0.140	<0.072	0.079	<0.011	0.270	<0.048	0.085	<0.031	<0.060	0.530	<0.096	<0.060	<0.130	<0.160	<0.130	0.300	1			
SB7	4-6	S	08/21/13	<0.250	<0.130	<0.066	0.034	0.042	<0.025	<0.044	<0.011	**0.260**	<0.055	0.280	<0.088	<0.055	<0.120	<0.140	<0.120	0.210	<0.023			
SB8	0-2	U	08/21/13	<0.290	<0.150	<0.075	<0.0038	<0.011	<0.029	<0.050	<0.013	<0.33	<0.063	0.260	<0.100	<0.063	<0.140	<0.160	**3.1**	0.250	<0.026			
G-1-1	3.5	U	05/18/15	0.242	0.058	0.099	0.0221	<0.0143	0.0197	<0.02	<0.0174	0.038	<0.0201	0.068	0.212	<0.0165	0.60	0.119	0.107	0.43	0.161	**1**	0.58	2.7E-06
G-2-1	3.5	U	05/18/15	<0.0201	0.078	0.048	0.179	0.20	0.276	0.175	0.131	**0.194**	0.034	0.34	<0.0184	0.139	<0.0205	<0.0199	<0.0203	0.112	0.32	**1**	0.2063	2.7E-06
G-3-1	3.5	U	05/18/15	<0.0201	<0.0198	<0.0171	0.0254	0.0217	0.032	0.0276	<0.0174	0.0245	<0.0201	0.038	<0.0184	0.0172	<0.0205	<0.0199	<0.0203	<0.0198	0.038	0	0.0013	2.5E-07
G-3-2	6.0	S	05/18/15	<0.1005	<0.099	<0.0855	<0.0955	<0.0715	<0.095	<0.1	<0.087	<0.096	<0.1005	<0.096	<0.092	<0.0825	4.3	13.1	**1.95**	<0.099	<0.096			
G-4-1	3.5	U	05/18/15	<0.0201	0.072	0.049	0.195	**0.213**	0.33	0.21	0.143	**0.231**	0.038	0.40	<0.0184	0.166	0.0247	0.0278	0.0209	0.136	0.35	**1**	0.0127	2.8E-06
G-6-1	3.5	U	05/18/15	<0.0201	0.049	0.048	0.132	**0.187**	0.247	0.62	0.089	0.137	**0.16**	0.213	<0.0184	0.236	0.090	0.109	0.078	0.126	0.204	**2**	0.9149	3.6E-06
G-7-1	3.5	U	05/18/15	<0.0201	<0.0198	<0.0171	0.0286	0.0155	0.0259	<0.02	<0.0174	0.0226	<0.0201	0.041	<0.0184	<0.0165	0.0234	0.032	0.0233	0.040	0.034	0	0.17	2.0E-07
G-8-1	3.5	U	05/18/15	<0.0201	0.183	0.075	0.46	**0.54**	**0.72**	0.48	0.273	**0.44**	0.098	0.60	<0.0184	0.35	0.11	0.165	0.149	0.188	0.54	**1**	0.4974	6.9E-06
G-9-1	3.5	U	05/19/15	<0.0201	0.099	0.082	0.188	**0.177**	0.292	0.179	0.108	**0.207**	0.041	0.281	0.0213	0.137	0.47	0.67	0.44	0.34	0.288	**1**	0.2642	2.6E-06
G-15-1	3.5	U	05/19/15	<0.201	0.66	1.12	**10.9**	**(9.3)**	**11**	5.2	3.8	**7.5**	**1.42**	14.3	<0.184	**5.2**	<0.205	<0.199	<0.203	1.12	13.2	**5**	0.9063	1.2E-04
G-16-1	3.5	U	05/19/15	<0.0201	<0.0198	<0.0171	<0.0191	<0.0143	<0.019	<0.02	<0.0174	<0.0192	<0.0201	<0.0192	<0.0184	<0.0165	<0.0205	<0.0199	<0.0203	<0.0198	<0.0192	0	0.0002	
G-17-1	3.5	U	05/19/15	0.038	0.041	0.103	0.32	**0.309**	0.37	0.236	0.152	**0.35**	0.039	0.71	0.0297	0.158	0.58	0.72	0.47	0.68	0.90	**1**	0.3319	4.0E-06
G-18-1	3.5	U	05/19/15	<0.0201	0.071	0.108	0.27	**0.285**	0.38	0.268	0.117	**0.312**	0.053	0.52	0.0251	0.201	0.105	0.161	0.111	0.313	0.48	**1**	0.6535	3.7E-06
G-19-1	3.5	U	05/19/15	<0.0201	0.141	0.136	0.43	**0.44**	**0.60**	0.39	0.259	**0.45**	0.078	0.91	0.038	0.306	0.039	0.044	0.043	0.48	0.84	**1**	0.464	5.7E-06
G-20-1	3.5	U	05/19/15	<0.201	<0.198	0.219	0.85	**0.91**	**1.41**	0.83	0.64	**1.02**	<0.201	2.22	<0.184	0.67	<0.205	<0.199	<0.203	0.95	1.83	**2**	0.205	1.1E-05
MW-1-1	3.5	U	11/23/15	0.243	0.35	0.49	0.143	**0.119**	0.32	0.246	0.067	**0.291**	0.036	0.155	0.61	0.117	2.33	3.08	**2.39**	1.32	0.93	**1**	0.2691	3.50E-06
MW-2-1	3.5	U	11/23/15	<0.0201	0.035	0.0205	0.058	0.068	0.116	0.072	0.048	0.065	<0.015	0.091	<0.0184	0.050	0.059	0.089	0.059	0.061	0.094	0	0.1431	8.4E-07
MW-3-1	3.5	U	11/23/15	<0.0201	0.098	0.038	0.091	**0.183**	0.267	0.191	0.104	0.096	0.034	0.057	<0.0184	0.151	0.094	0.166	0.11	<0.0198	0.077	**1**	0.5792	2.4E-06
MW-4-1	3.5	U	11/23/15	<0.0201	<0.0198	0.0236	0.058	0.077	0.139	0.085	0.051	0.072	0.0176	0.102	<0.0184	0.062	0.050	0.078	0.053	0.078	0.096	0	0.0055	1.1E-06
MW-5-1	3.5	U	11/23/15	0.292	0.058	0.77	**1.24**	**1.19**	**1.89**	0.85	0.87	**1.21**	**0.182**	2.66	0.292	0.70	0.097	0.111	0.119	2.4	2.11	**4**	0.0745	1.6E-05
MW-6-1	3.5	U	11/23/15	<0.0201	0.044	0.032	0.11	**0.131**	0.247	0.126	0.077	0.141	0.0247	0.223	<0.0184	0.09	0.068	0.077	0.060	0.157	0.207	**1**	0.1885	1.8E-06
Groundwater RCL				---	---	**197**	---	**0.47**	**0.4781**	---	---	**0.1442**	---	**88.8**	**14.8**	---	---	---	**0.6582**	---	**54.5**			
Non-Industrial Direct Contact RCL				**3590**	---	**17900**	**1.140**	**0.1150**	**1.15**	---	**11.50**	**115**	**0.1150**	**2390**	**2390**	**1.150**	**17.6**	**239**	**5.52**	---	**1790**		**1.00E+00**	**1.00E-05**
Industrial Direct Contact RCL				**(45200)**	---	**(100000)**	**(20.8)**	**(2.11)**	**(21.1)**	---	**(211)**	**(2110)**	**(2.11)**	**(30100)**	**(30100)**	**(21.1)**	**(72.7)**	**(3010)**	**(24.1)**	---	**(22600)**			
Soil Saturation Concentration (C-sat)*				---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---			

Bold = Groundwater RCL Exceedance
Bold & Underline = Non Industrial Direct Contact RCL Exceedance
(Bold & Parentheses) = Industrial Direct Contact RCL Exceedance
Bold &Asteric * = C-sat Exceedance
Italics = Industrial Direct Contact RCL
NS = Not Sampled
NM = Not Measured
(ppm) = parts per million
ND = No Detects
PAH = Polynuclear Aromatic Hydrocarbons
PID = Photoionization Detector
VOC's = Volatile Organic Compounds

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

A.2. Soil Analytical Results Table
Keller Property BRRTS #02-38-560993

Sampling Conducted on:	08/21/13	08/21/13	08/21/13	08/21/13	08/21/13	08/21/13	08/21/13	08/21/13	05/18/15	Bold = Groundwater RCL	Underline & Bold = Non-Industrial Direct Contact RCL	(Parenthesis & Bold) = Industrial Direct Contact RCL	Asteric * & Bold =Soil Saturation (C-sat) RCL
VOC's													
Sample ID#	SB1	SB2	SB3	SB4	SB5	SB6	SB7	SB8	G-3-2				
Sample Depth/ft.	4-6	4-6	2-4	4-6	4-6	4-6	4-6	4-6	6				
Acetone/ppm	0.200	0.140	3	0.350	0.220	0.250	<0.120	0.170	NS	3.6766	= =	= =	= =
Benzene/ppm	0.0059	0.200	3.4	0.110	0.011	0.032	0.0056	0.0072	< 0.16	0.00512	1.6	(7.07)	1820*
Bromobenzene/ppm	NS	NS	NS	NS	NS	NS	NS	NS	< 0.39	= =	342	(679)	= =
Bromodichloromethane/ppm	NS	NS	NS	NS	NS	NS	NS	NS	< 0.15	0.000326	0.418	(1.83)	= =
Bromoform/ppm	NS	NS	NS	NS	NS	NS	NS	NS	< 0.23	0.00233	25.4	(113)	= =
Bromomethane/ppm	<0.035	<0.033	<0.760	<0.045	<0.036	<0.035	<0.011	<0.039	NS	0.0051	= =	= =	= =
tert-Butylbenzene/ppm	<0.013	<0.012	<0.280	0.048	<0.013	<0.013	<0.011	<0.014	< 0.35	= =	183	(183)	183*
sec-Butylbenzene/ppm	<0.058	<0.015	0.700	0.400	<0.017	<0.016	<0.015	0.030	0.91 "J"	= =	145	(145)	145*
n-Butylbenzene/ppm	0.120	0.069	2.9	1.1	<0.014	0.016	<0.012	0.059	2.55 "J"	= =	108	(108)	108*
Carbon Disulfide/ppm	0.037	<0.023	0.530	<0.032	<0.025	<0.025	<0.022	<0.027	NS	0.5919	= =	= =	= =
Carbon Tetrachloride/ppm	NS	NS	NS	NS	NS	NS	NS	NS	< 0.21	0.00388	0.916	(4.03)	= =
Chlorobenzene/ppm	NS	NS	NS	NS	NS	NS	NS	NS	< 0.39	= =	370	(761)	761*
Chloroethane/ppm	NS	NS	NS	NS	NS	NS	NS	NS	< 0.45	0.227	= =	= =	= =
Chloroform/ppm	NS	NS	NS	NS	NS	NS	NS	NS	< 0.26	0.0033	0.454	(1.98)	= =
Chloromethane/ppm	<0.018	0.023	<0.380	<0.023	<0.018	<0.018	<0.016	<0.019	< 2.5	0.0155	159	(669)	= =
2-Chlorotoluene/ppm	NS	NS	NS	NS	NS	NS	NS	NS	< 0.29	= =	= =	= =	= =
4-Chlorotoluene/ppm	NS	NS	NS	NS	NS	NS	NS	NS	< 0.32	= =	= =	= =	= =
1,2-Dibromo-3-chloropropane/ppm	NS	NS	NS	NS	NS	NS	NS	NS	< 0.78	0.000173	0.008	(0.092)	= =
Dibromochloromethane/ppm	NS	NS	NS	NS	NS	NS	NS	NS	< 0.31	0.032	8.28	(38.9)	= =
1,4-Dichlorobenzene/ppm	<0.014	<0.013	<0.300	<0.018	<0.014	<0.014	<0.012	<0.015	< 0.3	0.144	3.74	(16.4)	= =
1,3-Dichlorobenzene/ppm	NS	NS	NS	NS	NS	NS	NS	NS	< 0.3	1.1528	297	(193)	297*
1,2-Dichlorobenzene/ppm	NS	NS	NS	NS	NS	NS	NS	NS	< 0.39	1.168	376	(376)	376*
Dichlorodifluoromethane/ppm	NS	NS	NS	NS	NS	NS	NS	NS	< 0.43	3.0863	126	(530)	= =
1,2-Dichloroethane/ppm	NS	NS	NS	NS	NS	NS	NS	NS	< 0.3	0.00284	0.652	(2.87)	540*
1,1-Dichloroethane/ppm	<0.016	<0.015	<0.350	<21	<0.017	<0.016	<0.015	<0.018	< 0.25	0.4834	5.06	(22.2)	= =
1,1-Dichloroethene/ppm	NS	NS	NS	NS	NS	NS	NS	NS	< 0.29	0.00502	320	(1190)	1190*
cis-1,2-Dichloroethene/ppm	<0.016	<0.015	<0.350	<0.021	<0.017	<0.016	<0.015	<0.018	< 0.21	0.0412	156	(2340)	= =
trans-1,2-Dichloroethene/ppm	<0.016	<0.015	<0.350	<0.021	<0.017	<0.016	<0.015	<0.018	< 0.24	0.626	1560	(1850)	= =
1,2-Dichloropropane/ppm	NS	NS	NS	NS	NS	NS	NS	NS	< 0.25	0.00332	0.406	(1.78)	= =
2,2-Dichloropropane/ppm	NS	NS	NS	NS	NS	NS	NS	NS	< 1	= =	527	(527)	527*
1,3-Dichloropropane/ppm	NS	NS	NS	NS	NS	NS	NS	NS	< 0.31	= =	1490	(1490)	1490*
Di-isopropyl ether/ppm	NS	NS	NS	NS	NS	NS	NS	NS	< 0.12	= =	2260	(2260)	2260*
EDB (1,2-Dibromoethane)/ppm	NS	NS	NS	NS	NS	NS	NS	NS	< 0.35	0.0000282	0.05	(0.221)	= =
Ethylbenzene/ppm	0.048	0.110	7.2	0.450	<0.014	0.045	<0.012	0.032	< 0.27	1.57	8.02	(35.4)	480*
Hexachlorobutadiene/ppm	NS	NS	NS	NS	NS	NS	NS	NS	< 1.1	= =	1.63	(7.19)	= =
Isopropylbenzene/ppm	0.050	0.023	12	1.1	<0.013	0.018	<0.011	<0.014	0.54 "J"	= =	= =	= =	= =
p-Isopropyltoluene/ppm	0.150	0.021	1.2	1.3	<0.014	<0.014	<0.012	0.021	1.49 "J"	= =	162	(162)	162*
Methylene chloride/ppm	0.030	0.028	0.840	0.062	0.040	0.031	0.026	0.040	< 2.2	0.00256	61.8	(1150)	= =
Methyl tert-butyl ether (MTBE)/ppm	<0.013	<0.012	<0.280	<0.017	<0.013	<0.013	<0.011	<0.014	< 0.25	0.027	63.8	(282)	8870*
Naphthalene/ppm	0.066	0.290	6.3	5.1	0.066	0.170	0.045	0.073	< 0.87	0.6582	5.52	(24.1)	= =
n-Propylbenzene/ppm	0.092	0.048	1.9	1.5	<0.016	0.023	<0.013	0.030	1.04 "J"	= =	= =	= =	= =
1,1,2,2-Tetrachloroethane/ppm	NS	NS	NS	NS	NS	NS	NS	NS	< 0.13	0.000156	0.81	(3.6)	= =
1,1,1,2-Tetrachloroethane/ppm	NS	NS	NS	NS	NS	NS	NS	NS	< 0.29	0.0534	2.78	(12.3)	= =
Tetrachloroethene (PCE)/ppm	<0.021	<0.020	<0.450	<0.027	<0.021	<0.021	<0.019	<0.023	< 0.54	0.00454	33	(145)	= =
Toluene/ppm	0.024	0.720	2.1	0.046	0.065	1.98	0.026	0.048	< 0.31	1.11	818	(818)	818*
1,2,4-Trichlorobenzene/ppm	NS	NS	NS	NS	NS	NS	NS	NS	< 0.85	0.408	24	(113)	= =
1,2,3-Trichlorobenzene/ppm	NS	NS	NS	NS	NS	NS	NS	NS	< 1.2	= =	62.6	(934)	= =
1,1,1-Trichloroethane/ppm	<0.019	<0.017	<0.400	<0.024	<0.019	<0.019	<0.017	<0.021	< 0.4	0.1402	640	= =	= =
1,1,2-Trichloroethane/ppm	NS	NS	NS	NS	NS	NS	NS	NS	< 0.33	0.00324	1.59	(7.01)	= =
Trichloroethene (TCE)/ppm	<0.007	<0.0065	<0.150	<0.0091	<0.0072	<0.007	<0.0062	<0.0077	< 0.42	0.00358	1.3	(8.41)	= =
Trichlorofluoromethane/ppm	<0.018	<0.016	<0.380	<0.023	<0.018	<0.018	<0.016	<0.019	< 0.6	2.2387	1230	(1230)	1230*
1,2,4-Trimethylbenzene/ppm	0.0760	0.270	6.5	12	0.037	0.130	0.024	0.150	5.3	1.38	219	(219)	219*
1,3,5-Trimethylbenzene/ppm	0.260	0.073	3.8	3.8	<0.016	0.028	<0.013	0.083	2.68 "J"		182	(182)	182*
Vinyl Chloride/ppm	<0.014	<0.013	<0.300	<0.018	<0.014	<0.014	<0.012	<0.015	< 0.1	0.000138	0.067	(2.08)	= =
m&p-Xylene/ppm	NS	NS	NS	NS	NS	NS	NS	NS	1.02 "J"	3.96	260	(260)	258*
o-Xylene/ppm	NS	NS	NS	NS	NS	NS	NS	NS	< 0.29				
Xylenes, Total/ppm	0.177	0.840	11.1	8.479	0.087	0.370	0.061	0.206	1.02-1.31	3.96	260	(260)	258*

NS = not sampled, NM = Not Measured
(ppm) = parts per million
DRO = Diesel Range Organics
GRO = Gasoline Range Organics
= = No Exceedences
"J" Flag: Analyte detected between LOD and LOQ LOD Limit of Detection LOQ Limit of Quantitation

A.3. Residual Soil Analytical Results Table
Keller Property BRRTS #02-38-560993
(PVOCs)

Sample ID	Depth (feet)	Saturation U/S	Date	PID	Lead (ppm)	DRO (ppm)	GRO (ppm)	Benzene (ppm)	Ethyl Benzene (ppm)	MTBE (ppm)	Naph-thalene (ppm)	Toluene (ppm)	1,2,4-Trime-thylbenzene (ppm)	1,3,5-Trime-thylbenzene (ppm)	Xylene (Total) (ppm)	Other VOC's (ppb)	DIRECT CONTACT PVOC & PAH COMBINED: Exeedance Count	Hazard Index	Cumulative Cancer Risk
SB3	2-4	U	08/21/13	>300	NS	NS	NS	**3.4**	**7.2**	<0.280	**6.3**	**2.1**	**6.5**	**3.8**	**11.1**	SEE VOC SPREADSHEET	**2**	0.1307	4.2E-06
SB8	0-2	U	08/21/13	2.6	NS	NS	NS	**0.0072**	**0.032**	<0.014	**0.073**	0.048	0.1580	0.083	0.206	SEE VOC SPREADSHEET	0	0.0015	2.2E-08
G-1-1	3.5	U	05/18/15	300.0	**186.0**	NS	NS	**3.03**	**6.0**	<0.25	0.107	**2.94**	**12.7**	**9.9**	**16**	NS	**1**	0.58	2.7E-06
G-2-1	3.5	U	05/18/15	140.0	**72.7**	NS	NS	**0.115**	0.38	<0.025	<0.0203	0.291	**1.87**	**1.44**	2.08	NS	**1**	0.2063	2.7E-06
G-4-1	3.5	U	05/18/15	0.0	**28.2**	NS	NS	<0.025	<0.025	<0.025	0.0209	<0.025	<0.025	<0.025	0.127	NS	**1**	0.0127	2.8E-06
G-6-1	3.5	U	05/18/15	0.0	**361.0**	NS	NS	<0.025	<0.025	<0.025	0.078	0.093	0.101	0.048	0.249	NS	**2**	0.9149	3.6E-06
G-7-1	3.5	U	05/18/15	0.0	**65.2**	NS	NS	<0.025	0.11	<0.025	0.0233	0.154	**1.05**	**0.41**	1.39	NS	0	0.17	2.0E-07
G-8-1	3.5	U	05/18/15	0.0	**186.0**	NS	NS	<0.025	<0.025	<0.025	0.149	<0.025	<0.025	<0.025	<0.075	NS	**1**	0.4974	6.9E-06
G-9-1	3.5	U	05/19/15	0.0	**99.1**	NS	NS	<0.025	0.104	<0.025	0.44	0.064	<0.025	<0.025	0.533	NS	**1**	0.2642	2.6E-06
G-15-1	3.5	U	05/19/15	0.0	**148.0**	NS	NS	<0.025	<0.025	<0.025	<0.203	0.060	0.043	0.038	0.15	NS	**5**	0.9063	1.2E-04
G-16-1	3.5	U	05/19/15	0.0	**43.0**	NS	NS	<0.025	<0.025	<0.025	<0.0203	<0.025	<0.025	<0.025	0.13	NS	0	0.0002	
G-17-1	3.5	U	05/19/15	0.0	**119.0**	NS	NS	**0.101**	0.66	<0.025	0.47	**1.53**	**1.17**	**0.51**	3.58	NS	**1**	0.3319	4.0E-06
G-18-1	3.5	U	05/19/15	0.0	**254.0**	NS	NS	<0.025	0.059	<0.025	0.111	0.059	0.087	0.0309	0.235	NS	**1**	0.6535	3.7E-06
G-19-1	3.5	U	05/19/15	0.0	**175.0**	NS	NS	<0.025	0.039	<0.025	0.043	0.064	0.040	0.040	0.224	NS	**1**	0.464	5.7E-06
G-20-1	3.5	U	05/19/15	0.0	**60.6**	NS	NS	<0.025	<0.025	<0.025	<0.203	0.037	<0.025	0.041	0.043-0.048	NS	**2**	0.205	1.1E-05
MW-1-1	3.5	U	11/23/15	1.8	**70.5**	NS	NS	**1.27**	**1.99**	<0.25	**2.39**	**3.8**	**6.2**	**6.0**	**8.9**	NS	**1**	0.2691	3.50E-06
MW-2-1	3.5	U	11/23/15	1.8	**54.8**	NS	NS	**0.048**	0.057	<0.025	0.059	0.219	0.112	0.080	0.334	NS	0	0.1431	8.4E-07
MW-3-1	3.5	U	11/23/15	0.9	**227.0**	NS	NS	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.075	NS	**1**	0.5792	2.4E-06
MW-4-1	3.5	U	11/23/15	0.9	**35.8**	NS	NS	<0.025	<0.025	<0.025	0.053	0.073	0.056	0.0281	0.138	NS	0	0.0055	1.1E-06
MW-5-1	3.5	U	11/23/15	0.6	12.0	NS	NS	**0.196**	0.135	<0.025	0.119	0.65	0.257	0.085	0.85	NS	**4**	0.0745	1.6E-05
MW-6-1	3.5	U	11/23/15	1.1	**72.1**	NS	NS	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.075	NS	**1**	0.1885	1.8E-06
G-26-1	3.5	U	04/11/17	0.6	**62.7**	NS	NS	**0.117**	0.167	<0.025	0.34	0.75	0.32	0.105	1.17	NS	0	0.1625	1.6E-07
Groundwater RCL					27	-	-	**0.00512**	**1.57**	**0.027**	**0.6582**	**1.11**	**1.38**		**3.96**	-			
Non-Industrial Direct Contact RCL					**400**	-	-	**1.6**	**8.02**	**63.8**	**5.52**	**818**	**219**	**182**	**260**	-		1.00E+00	1.00E-05
Industrial Direct Contact RCL					**(800)**	-	-	**(7.07)**	**(35.4)**	**(282)**	**(24.1)**	**(818)**	**(219)**	**(182)**	**(260)**	-		1.00E+00	1.00E-05
Soil Saturation Concentration (C-sat)*					-	-	-	**1820***	**480***	**8870***	-	**818***	**219***	**182***	**260***	-			

Bold = Groundwater RCL Exceedance
Bold & Underline = Non Industrial Direct Contact RCL Exceedance
(Bold & Parentheses) = Industrial Direct Contact RCL Exceedance
Bold & Asteric * = C-sat Exceedance
Italics = Industrial Direct Contact RCL
NS = Not Sampled
NM = Not Measured
(ppm) = parts per million
ND = No Detects
DRO = Diesel Range Organics
GRO = Gasoline Range Organics
PID = Photoionization Detector
PVOC's = Petroleum Volatile Organic Compounds
VOC's = Volatile Organic Compounds
Note: Non-Industrial RCLs apply to this site.

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

A.3. Residual Soil Analytical Results Table
(PAH)
Keller Property BRRTS #02-38-560993

Sample	Depth (feet)	Saturation U/S	Date	Acenaph-thene (ppm)	Acenaph-thylene (ppm)	Anthracene (ppm)	Benzo(a) anthracene (ppm)	Benzo(a) pyrene (ppm)	Benzo(b) fluoranthene (ppm)	Benzo(g,h,I) perylene (ppm)	Benzo(k) fluoranthene (ppm)	Chrysene (ppm)	Dibenzo(a,h) anthracene (ppm)	Fluoranthene (ppm)	Fluorene (ppm)	Indeno(1,2,3-cd) pyrene (ppm)	1-Methyl-naphthalene (ppm)	2-Methyl-naphthalene (ppm)	Naph-thalene (ppm)	Phenan-threne (ppm)	Pyrene (ppm)	DIRECT CONTACT PVOC & PAH COMBINED		
																						Exeedance Count	Hazard Index	Cumulative Cancer Risk
SB3	2-4	U	08/21/13	<5.700	<3	<1.500	<0.074	<0.220	<0.570	<0.990	<0.250	<0.640	<1.200	<0.350	<2	<1.200	<2.700	**4.5**	<2.700	9.4	<0.520	**2**	0.1307	4.2E-06
SB8	0-2	U	08/21/13	<0.290	<0.150	<0.075	<0.0038	<0.011	<0.029	<0.050	<0.013	<0.33	<0.063	0.260	<0.100	<0.063	<0.140	<0.160	**3.1**	0.250	<0.026			
G-2-1	3.5	U	05/18/15	<0.0201	0.078	0.048	0.179	0.20	0.276	0.175	0.131	**0.194**	0.034	0.34	<0.0184	0.139	<0.0205	<0.0199	<0.0203	0.112	0.32	**1**	0.2063	2.7E-06
G-4-1	3.5	U	05/18/15	<0.0201	0.072	0.049	0.195	**0.213**	0.33	0.21	0.143	**0.231**	0.038	0.40	<0.0184	0.166	0.0247	0.0278	0.0209	0.136	0.35	**1**	0.0127	2.8E-06
G-6-1	3.5	U	05/18/15	<0.0201	0.049	0.048	0.132	**0.187**	0.247	0.62	0.089	0.137	**0.16**	0.213	<0.0184	0.236	0.090	0.109	0.078	0.126	0.204	**2**	0.9149	3.6E-06
G-8-1	3.5	U	05/18/15	<0.0201	0.183	0.075	0.46	**0.54**	**0.72**	0.48	0.273	**0.44**	0.098	0.60	<0.0184	0.35	0.11	0.165	0.149	0.188	0.54	**1**	0.4974	6.9E-06
G-9-1	3.5	U	05/19/15	<0.0201	0.099	0.082	0.188	**0.177**	0.292	0.179	0.108	**0.207**	0.041	0.281	0.0213	0.137	0.47	0.67	0.44	0.34	0.288	**1**	0.2642	2.6E-06
G-15-1	3.5	U	05/19/15	<0.201	0.66	1.12	**10.9**	**(9.3)**	**11**	5.2	3.8	**7.5**	**1.42**	14.3	<0.184	**5.2**	<0.205	<0.199	<0.203	1.12	13.2	**5**	0.9063	1.2E-04
G-17-1	3.5	U	05/19/15	0.038	0.041	0.103	0.32	**0.309**	0.37	0.236	0.152	**0.35**	0.039	0.71	0.0297	0.158	0.58	0.72	0.47	0.68	0.90	**1**	0.3319	4.0E-06
G-18-1	3.5	U	05/19/15	<0.0201	0.071	0.108	0.27	**0.285**	0.38	0.268	0.117	**0.312**	0.053	0.52	0.0251	0.201	0.105	0.161	0.111	0.313	0.48	**1**	0.6535	3.7E-06
G-19-1	3.5	U	05/19/15	<0.0201	0.141	0.136	0.43	**0.44**	**0.60**	0.39	0.259	**0.45**	0.078	0.91	0.038	0.306	0.039	0.044	0.043	0.48	0.84	**1**	0.464	5.7E-06
G-20-1	3.5	U	05/19/15	<0.201	<0.198	0.219	0.85	**0.91**	**1.41**	0.83	0.64	**1.02**	<0.201	2.22	<0.184	0.67	<0.205	<0.199	<0.203	0.95	1.83	**2**	0.205	1.1E-05
MW-1-1	3.5	U	11/23/15	0.243	0.35	0.49	0.143	**0.119**	0.32	0.246	0.067	**0.291**	0.036	0.155	0.61	0.117	2.33	3.08	**2.39**	1.32	0.93	**1**	0.2691	3.50E-06
MW-3-1	3.5	U	11/23/15	<0.0201	0.098	0.038	0.091	**0.183**	0.267	0.191	0.104	0.096	0.034	0.057	<0.0184	0.151	0.094	0.166	0.11	<0.0198	0.077	**1**	0.5792	2.4E-06
MW-5-1	3.5	U	11/23/15	0.292	0.058	0.77	**1.24**	**1.19**	**1.89**	0.85	0.87	**1.21**	**0.182**	2.66	0.292	0.70	0.097	0.111	0.119	2.4	2.11	**4**	0.0745	1.6E-05
MW-6-1	3.5	U	11/23/15	<0.0201	0.044	0.032	0.11	**0.131**	0.247	0.126	0.077	0.141	0.0247	0.223	<0.0184	0.09	0.068	0.077	0.060	0.157	0.207	**1**	0.1885	1.8E-06
Groundwater RCL				---	---	**197**	---	**0.47**	**0.4781**	---	---	**0.1442**	---	**88.8**	**14.8**	---	---	---	**0.6582**	---	**54.5**			
Non-Industrial Direct Contact RCL				**3590**	---	**17900**	**1.140**	**0.1150**	**1.15**	---	**11.50**	**115**	**0.1150**	**2390**	**2390**	**1.150**	**17.6**	**239**	**5.52**	---	**1790**		**1.00E+00**	**1.00E-05**
Industrial Direct Contact RCL				**(45200)**	---	**(100000)**	**(20.8)**	**(2.11)**	**(21.1)**	---	**(211)**	**(2110)**	**(2.11)**	**(30100)**	**(30100)**	**(21.1)**	**(72.7)**	**(3010)**	**(24.1)**	---	**(22600)**			
Soil Saturation Concentration (C-sat)*				---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---			

Bold = Groundwater RCL Exceedance
Bold & Underline = Non Industrial Direct Contact RCL Exceedance
(Bold & Parentheses) = Industrial Direct Contact RCL Exceedance
Bold &Asteric * = C-sat Exceedance
Italics = Industrial Direct Contact RCL
NS = Not Sampled
(ppm) = parts per million
PAH = Polynuclear Aromatic Hydrocarbons
PID = Photoionization Detector
VOC's = Volatile Organic Compounds

NM = Not Measured
ND = No Detects

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

A.3.Residual Soil Analytical Results Table
Keller Property BRRTS #02-38-560993
(VOCs)

Sampling Conducted on: **08/21/13**

VOC's		Bold = Groundwater RCL	Underline & Bold = Non-Industrial Direct Contact RCL	(Parenthesis & Bold) = Industrial Direct Contact RCL	Asteric * & Bold =Soil Saturation (C-sat) RCL
Sample ID#	**SB3**				
Sample Depth/ft.	**2-4**				
Acetone/ppm	3	**3.6766**	= =	= =	= =
Benzene/ppm	**3.4**	**0.00512**	**1.6**	**(7.07)**	**1820***
Bromobenzene/ppm	NS	= =	**342**	**(679)**	= =
Bromodichloromethane/ppm	NS	**0.000326**	**0.418**	**(1.83)**	= =
Bromoform/ppm	NS	**0.00233**	**25.4**	**(113)**	= =
Bromomethane/ppm	<0.760	**0.0051**	= =	= =	= =
tert-Butylbenzene/ppm	<0.280	= =	**183**	**(183)**	**183***
sec-Butylbenzene/ppm	0.700	= =	**145**	**(145)**	**145***
n-Butylbenzene/ppm	2.9	= =	**108**	**(108)**	**108***
Carbon Disulfide/ppm	0.530	**0.5919**	= =	= =	= =
Carbon Tetrachloride/ppm	NS	**0.00388**	**0.916**	**(4.03)**	= =
Chlorobenzene/ppm	NS	= =	**370**	**(761)**	**761***
Chloroethane/ppm	NS	**0.227**	= =	= =	= =
Chloroform/ppm	NS	**0.0033**	**0.454**	**(1.98)**	= =
Chloromethane/ppm	<0.380	**0.0155**	**159**	**(669)**	= =
2-Chlorotoluene/ppm	NS	= =	= =	= =	= =
4-Chlorotoluene/ppm	NS	= =	= =	= =	= =
1,2-Dibromo-3-chloropropane/ppm	NS	**0.000173**	**0.008**	**(0.092)**	= =
Dibromochloromethane/ppm	NS	**0.032**	**8.28**	**(38.9)**	= =
1,4-Dichlorobenzene/ppm	<0.300	**0.144**	**3.74**	**(16.4)**	= =
1,3-Dichlorobenzene/ppm	NS	**1.1528**	**297**	**(193)**	**297***
1,2-Dichlorobenzene/ppm	NS	**1.168**	**376**	**(376)**	**376***
Dichlorodifluoromethane/ppm	NS	**3.0863**	**126**	**(530)**	= =
1,2-Dichloroethane/ppm	NS	**0.00284**	**0.652**	**(2.87)**	**540***
1,1-Dichloroethane/ppm	<0.350	**0.4834**	**5.06**	**(22.2)**	= =
1,1-Dichloroethene/ppm	NS	**0.00502**	**320**	**(1190)**	**1190***
cis-1,2-Dichloroethene/ppm	<0.350	**0.0412**	**156**	**(2340)**	= =
trans-1,2-Dichloroethene/ppm	<0.350	**0.626**	**1560**	**(1850)**	= =
1,2-Dichloropropane/ppm	NS	**0.00332**	**0.406**	**(1.78)**	= =
2,2-Dichloropropane/ppm	NS	= =	**527**	**(527)**	**527***
1,3-Dichloropropane/ppm	NS	= =	**1490**	**(1490)**	**1490***
Di-isopropyl ether/ppm	NS	= =	**2260**	**(2260)**	**2260***
EDB (1,2-Dibromoethane)/ppm	NS	**0.0000282**	**0.05**	**(0.221)**	= =
Ethylbenzene/ppm	**7.2**	**1.57**	**8.02**	**(35.4)**	**480***
Hexachlorobutadiene/ppm	NS	= =	**1.63**	**(7.19)**	= =
Isopropylbenzene/ppm	12	= =	= =	= =	= =
p-Isopropyltoluene/ppm	1.2	= =	**162**	**(162)**	**162***
Methylene chloride/ppm	**0.840**	**0.00256**	**61.8**	**(1150)**	= =
Methyl tert-butyl ether (MTBE)/ppm	<0.280	**0.027**	**63.8**	**(282)**	**8870***
Naphthalene/ppm	**6.3**	**0.6582**	**5.52**	**(24.1)**	= =
n-Propylbenzene/ppm	1.9	= =	= =	= =	= =
1,1,2,2-Tetrachloroethane/ppm	NS	**0.000156**	**0.81**	**(3.6)**	= =
1,1,1,2-Tetrachloroethane/ppm	NS	**0.0534**	**2.78**	**(12.3)**	= =
Tetrachloroethene (PCE)/ppm	<0.450	**0.00454**	**33**	**(145)**	= =
Toluene/ppm	**2.1**	**1.11**	**818**	**(818)**	**818***
1,2,4-Trichlorobenzene/ppm	NS	**0.408**	**24**	**(113)**	= =
1,2,3-Trichlorobenzene/ppm	NS	= =	**62.6**	**(934)**	= =
1,1,1-Trichloroethane/ppm	<0.400	**0.1402**	**640**	= =	= =
1,1,2-Trichloroethane/ppm	NS	**0.00324**	**1.59**	**(7.01)**	= =
Trichloroethene (TCE)/ppm	<0.150	**0.00358**	**1.3**	**(8.41)**	= =
Trichlorofluoromethane/ppm	<0.380	**2.2387**	**1230**	**(1230)**	**1230***
1,2,4-Trimethylbenzene/ppm	**6.5**	**1.38**	**219**	**(219)**	**219***
1,3,5-Trimethylbenzene/ppm	**3.8**		**182**	**(182)**	**182***
Vinyl Chloride/ppm	<0.300	**0.000138**	**0.067**	**(2.08)**	= =
m&p-Xylene/ppm	NS	**3.96**	**260**	**(260)**	**258***
o-Xylene/ppm	NS				
Xylenes, Total/ppm	**11.1**	**3.96**	**260**	**(260)**	**258***

NS = not sampled, NM = Not Measured
(ppm) = parts per million
DRO = Diesel Range Organics
GRO = Gasoline Range Organics
= = No Exceedences
"J" Flag: Analyte detected between LOD and LOQ LOD Limit of Detection LOQ Limit of Quantitation

A.6 Water Level Elevations
Keller Property BRRTS #02-38-560993
Marinette, Wisconsin

	MW-1	MW-2	MW-3	MW-4	MW-5	MW-6	TW-24
Ground Surface (feet msl)	583.97	583.72	583.81	584.28	583.79	584.34	NM
Ground Surface (feet msl) resurveyed 1-8-18	584.65	584.49	584.63	585.14	584.59	585.11	NM
PVC top (feet msl)	583.51	583.28	583.30	583.81	583.33	583.88	NM
PVC top (feet msl) resurveyed 1-8-18	584.51	584.26	584.28	584.75	584.29	584.92	585.11
Well Depth (feet)	13.00	13.00	13.00	13.00	13.00	13.00	4
Top of screen (feet msl)	568.65	580.72	580.81	581.28	580.79	581.34	NM
Top of screen (feet msl) resurveyed 1-8-18	581.65	581.49	581.63	582.14	581.59	582.11	NM
Bottom of screen (feet msl)	558.65	570.72	570.81	571.28	570.79	571.34	NM
Bottom of screen (feet msl) resurveyed 1-8-18	571.65	571.49	571.63	572.14	571.59	572.11	NM
Depth to Water From Top of PVC (feet)							
01/20/16	3.88	3.61	3.70	4.19	3.69	4.16	NM
04/11/17	3.11	2.86	2.87	3.37	2.91	3.48	1.54
10/10/17	3.71	3.52	3.53	3.83	3.50	4.11	1.19
01/08/18	4.40	4.15	4.13	4.62	4.13	4.82	1.96
Depth to Water From Ground Surface (feet)							
01/20/16	4.34	4.05	4.21	4.66	4.15	4.62	NM
04/11/17	3.57	3.30	3.38	3.84	3.37	3.94	NM
10/10/17	3.85	3.75	3.88	4.22	3.80	4.30	NM
01/08/18	4.54	4.38	4.48	5.01	4.43	5.01	NM
Groundwater Elevation (feet msl)							
01/20/16	579.63	579.67	579.60	579.62	579.64	579.72	NM
04/11/17	580.40	580.42	580.43	580.44	580.42	580.40	NM
10/10/17	580.80	580.74	580.75	580.92	580.79	580.81	NM
01/08/18	580.11	580.11	580.15	580.13	580.16	580.10	NM

CNL = Could Not Locate
: Abandoned and removed during soil excavation project
NI = Not Installed

A.7 Other
Groundwater NA Indicator Results
Keller Property BRRTS #02-38-560993

Well MW-1

Date	Dissolved Oxygen (ppm)	pH	ORP	Temp (C)	Specific Conductance	Nitrate + Nitrite (ppm)	Total Sulfate (ppm)	Dissolved Iron (ppm)	Man-ganese (ppb)
01/20/16	2.86	6.57	-32	7.2	408	0.401	15.7	2.54	**677**
04/11/17	1.56	6.85	35	6.5	630	NS	NS	NS	NS
10/10/17	0.30	NS	NS	14.7	NS	NS	NS	NS	NS
01/08/18	2.62	7.23	47	6.0	1879	NS	NS	NS	NS
ENFORCE MENT STANDARD = **ES – Bold**						**10**	-	-	**300**
PREVENTIVE ACTION LIMIT = *PAL - Italics*						*2*	-	-	*60*

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

Well MW-2

Date	Dissolved Oxygen (ppm)	pH	ORP	Temp (C)	Specific Conductance	Nitrate + Nitrite (ppm)	Total Sulfate (ppm)	Dissolved Iron (ppm)	Man-ganese (ppb)
01/20/16	3.35	6.64	187	5.9	732	0.329	47.8	0.74	**563**
04/11/17	0.47	6.82	204	4.4	731	NS	NS	NS	NS
10/10/17	NOT SAMPLED					NS	NS	NS	NS
01/08/18	NOT SAMPLED					NS	NS	NS	NS
ENFORCE MENT STANDARD = **ES – Bold**						**10**	-	-	**300**
PREVENTIVE ACTION LIMIT = *PAL - Italics*						*2*	-	-	*60*

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

Well MW-3

Date	Dissolved Oxygen (ppm)	pH	ORP	Temp (C)	Specific Conductance	Nitrate + Nitrite (ppm)	Total Sulfate (ppm)	Dissolved Iron (ppm)	Man-ganese (ppb)
01/20/16	3.42	6.62	-61	5.7	780	0.509	81.8	0.44	*150*
04/11/17	0.78	6.85	47	4.8	635	NS	NS	NS	NS
10/10/17	NOT SAMPLED					NS	NS	NS	NS
01/08/18	NOT SAMPLED					NS	NS	NS	NS
ENFORCE MENT STANDARD = **ES – Bold**						**10**	-	-	**300**
PREVENTIVE ACTION LIMIT = *PAL - Italics*						*2*	-	-	*60*

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

Well MW-4

Date	Dissolved Oxygen (ppm)	pH	ORP	Temp (C)	Specific Conductance	Nitrate + Nitrite (ppm)	Total Sulfate (ppm)	Dissolved Iron (ppm)	Man-ganese (ppb)
01/20/16	2.79	6.39	-108	7.3	734	0.357	145	1.70	**321**
04/11/17	1.46	6.84	130	7.0	817	NS	NS	NS	NS
10/10/17	NOT SAMPLED					NS	NS	NS	NS
01/08/18	NOT SAMPLED					NS	NS	NS	NS
ENFORCE MENT STANDARD = **ES – Bold**						**10**	-	-	**300**
PREVENTIVE ACTION LIMIT = *PAL - Italics*						*2*	-	-	*60*

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

A.7 Other
Groundwater NA Indicator Results
Keller Property BRRTS #02-38-560993

Well MW-5

Date	Dissolved Oxygen (ppm)	pH	ORP	Temp (C)	Specific Conductance	Nitrate + Nitrite (ppm)	Total Sulfate (ppm)	Dissolved Iron (ppm)	Man-ganese (ppb)
01/20/16	6.73	6.52	223	7.2	666	0.296	33.2	0.62	**353**
04/11/17	1.81	6.55	206	7.5	768	NS	NS	NS	NS
10/10/17	NOT SAMPLED					NS	NS	NS	NS
01/08/18	NOT SAMPLED					NS	NS	NS	NS
ENFORCE MENT STANDARD = **ES – Bold**						**10**	-	-	**300**
PREVENTIVE ACTION LIMIT = *PAL - Italics*						*2*	-	-	*60*

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

Well MW-6

Date	Dissolved Oxygen (ppm)	pH	ORP	Temp (C)	Specific Conductance	Nitrate + Nitrite (ppm)	Total Sulfate (ppm)	Dissolved Iron (ppm)	Man-ganese (ppb)
01/20/16	7.54	6.55	213	8.1	857	0.257	65.1	0.63	**410**
04/11/17	1.11	6.72	23	4.5	836	NS	NS	NS	NS
10/10/17	NOT SAMPLED					NS	NS	NS	NS
01/08/18	NOT SAMPLED					NS	NS	NS	NS
ENFORCE MENT STANDARD = **ES – Bold**						**10**	-	-	**300**
PREVENTIVE ACTION LIMIT = *PAL - Italics*						*2*	-	-	*60*

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

Well TW-24

Date	Dissolved Oxygen (ppm)	pH	ORP	Temp (C)	Specific Conductance	Nitrate + Nitrite (ppm)	Total Sulfate (ppm)	Dissolved Iron (ppm)	Man-ganese (ppb)
04/11/17	3.14	6.99	166	3.3	419.8	NS	NS	NS	NS
10/10/17	NOT SAMPLED					NS	NS	NS	NS
01/08/18	NOT SAMPLED					NS	NS	NS	NS
ENFORCE MENT STANDARD = **ES – Bold**						**10**	-	-	**300**
PREVENTIVE ACTION LIMIT = *PAL - Italics*						*2*	-	-	*60*

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

A.7 Other
Keller Property
Slug Test Calculations

MW-1

	ft/s	cm/s	m/yr
K	1.97E-04	6.00E-03	1893.60
	sq ft/s	**sq cm/s**	
T	1.79E-03	1.66E+00	

MW-2

	ft/s	cm/s	m/yr
K	3.55E-04	1.08E-02	3412.32
	sq ft/s	**sq cm/s**	
T	3.34E-03	3.10E+00	

MW-4

	ft/s	cm/s	m/yr
K	5.37E-05	1.64E-03	516.17
	sq ft/s	**sq cm/s**	
T	4.73E-04	4.39E-01	

Date	Elv. (High)	Elv. (Low)	Distance (ft)	Hyd Grad (I)
1/20/2016	579.72	579.62	89	0.0011236
4/11/2017	580.43	580.41	18	0.0011111
10/10/2017	580.90	580.76	33	0.0042424
1/8/2018	580.14	580.10	93	0.0004301
Average				0.0017268

	K (m/yr)	I	n	Flow Velocity (m/yr)
MW-1	1893.60	0.0017268	0.3	10.89956
MW-2	3412.32	0.0017268	0.3	19.64131
MW-4	516.17	0.0017268	0.3	2.97107

Attachment B/Maps and Figures

B.1 Location Maps

B.1.a Location Map

B.1.b Detailed Site Map

B.1.c RR Sites Map

B.2 Soil Figures

B.2.a Soil Contamination

B.2.b Residual Soil Contamination

B.3 Groundwater Figures

B.3.a Geologic Cross-Section Figure(s)

B.3.b Groundwater Isoconcentration

B.3.c Groundwater Flow Direction

B.3.d Monitoring Wells

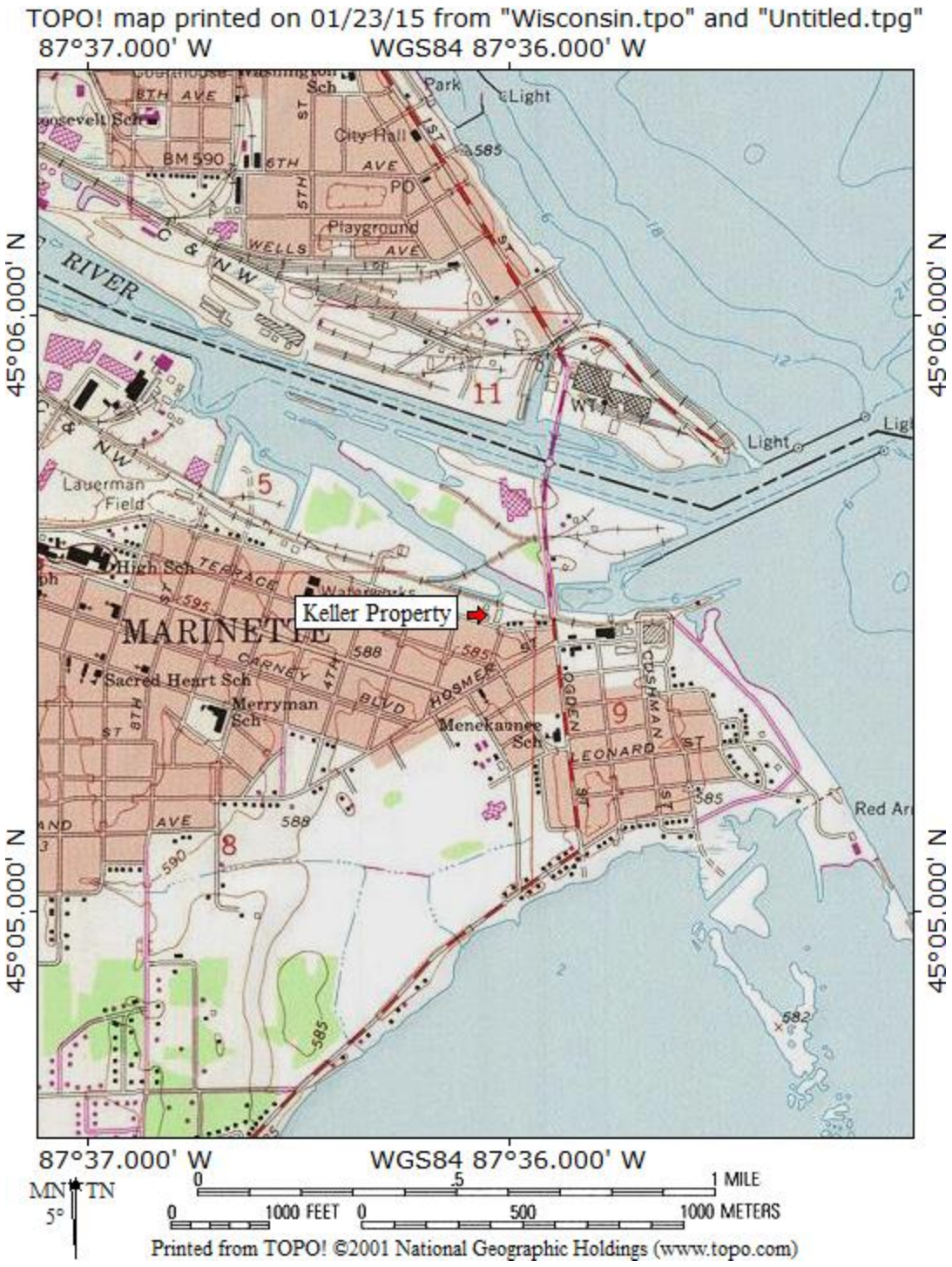
B.4 Vapor Maps and Other Media

B.4.a Vapor Intrusion Map - No vapor samples were assessed as part of the site investigation.

B.4.b Other media of concern (e.g., sediment or surface water) – No surface waters or sediments were sampled as part of this site investigation.

B.4.c Other – No other relevant maps and/or figures are being included.

B.5 Structural Impediment Photos – No structural impediments interfered with the investigation, therefore no photos are being included.



B.1.a LOCATION MAP CONTOUR INTERVAL 5 FEET
KELLER PROPERTY – MARINETTE, WI
SEAMLESS USGS TOPOGRAPHIC MAPS ON CD-ROM

B.I.b
DETAILED SITE MAP
KELLER PROPERTY

METCO
709 Gillette St, Suite 3
La Crosse, WI 54603
Tel: (608) 781-8875
Fax: (608) 781-8893
Excellence through experience

MARINETTE, WISCONSIN

DRAWN BY: ED DATE: 1/23/2015
MODIFIED BY: HH DATE: 4/13/2017

4 of 7

NOTE: INFORMATION BASED ON AVAILABLE DATA ACTUAL CONDITIONS MAY DIFFER

CITY OF MARINETTE PROPERTY

SLOPE DOWN TO MARSH

FORMER RAILROAD TRACKS - CANADIAN NATIONAL PROPERTY

PARCEL ID # 251-00948-003

G-6 OLD FENCE LINE

G-7 G-8 MW-3 G-5 MW-4 G-4 MW-5 G-21

G-24/TW-24 G-10

GRAVEL

G-19 C

A. F B. F SBI/TW1 A. F B. F SB2

CONCRETE WALL

FMR PLATFORM

E MW-2 E G-18 E G-17 F

G-2 G MW-1 G-3 D G-20

FMR LOADING PLAT-FORM G-25 SB5/TW3

H G-1 SB3/TW2

MARSH

G-11

G-9

CONCRETE

AREA A: 190' x 40' x 1'

OLD FENCE LINE

GRAVEL/GRASS

G-22

AREA B: 117' x 70' x 1'

GRAVEL GRAVEL

OVERHANG

SB-4

WAREHOUSE 102 WATER STREET

G-26 G-16 MW-6 G-15

CONCRETE

ELEVATED LOADING DOCK

VACANT WOODED LOT - MARINETTE HOUSING AUTHORITY

G-12

FENCE

CRUSHED ROCK

CELL TOWER

SB8

PARCEL ID # 251-04692-000

SAND

G-27

SB6

SB7/TW4

G-23

FENCE

ELECTRIC PANEL

VACATED STREET

RESIDENTIAL

G-14

CONCRETE

GRASS

G-13

WATER STREET

IST ST

RESIDENTIAL

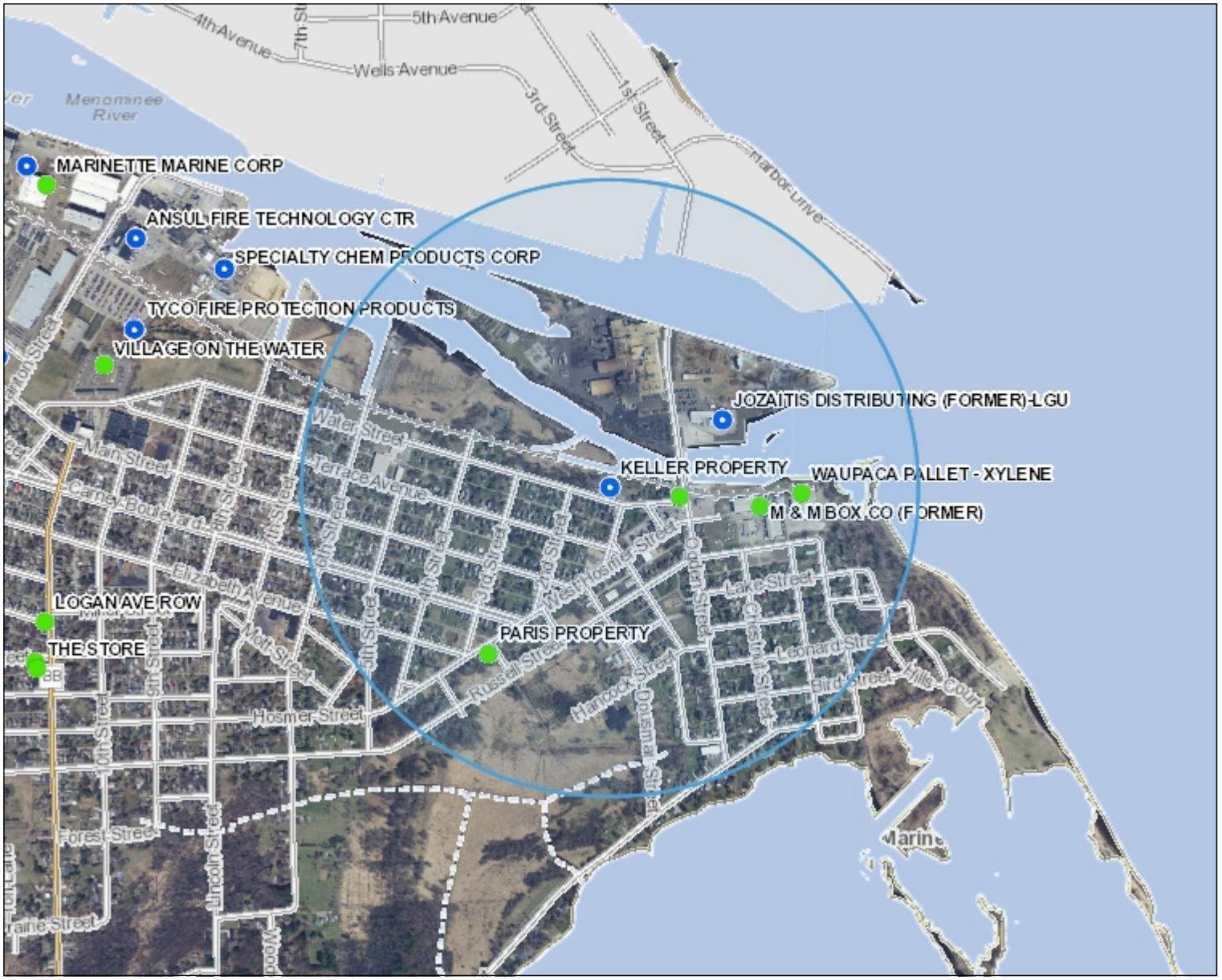
- WATER LINE
- SANITARY SEWER LINE
- STORM SEWER LINE
- NATURAL GAS LINE
- BURIED ELECTRIC LINE
- OVERHEAD UTILITIES
- TELEPHONE/CABLE LINE
- PROPERTY LINE
- SEWER MANHOLE
- STORM DRAIN
- PHASE 2 ESA SOIL BORING LOCATION
- GEOPROBE BORING LOCATION
- MONITORING WELL LOCATION
- TEMPORARY WELL LOCATION

SCALE: 1 INCH - 30 FEET
0 15 30

KEY TO FORMER ASTS
A = 18,000-GAL GASOLINE (1921 SANBORN MAP)
B = 18,000-GAL KEROSENE (1921 SANBORN MAP)
C = 200,000-GAL GASOLINE (1921 AND 1952 SANBORN MAP)
D = 6,000-GAL LUBRICATING OIL (1921 AND 1935 SANBORN MAP)
E = UNKNOWN CONTENTS (1969 AERIAL PHOTO AND 1975 TAX ASSESSORS RECORDS)
F = 18,000-GAL GASOLINE TANK (1952 SANBORN MAP)
G = PUMP HOUSE (1952 SANBORN MAP)
H = UNIDENTIFIED STRUCTURE/ POSSIBLE LOADING RACK (1952 SANBORN MAP)

- LOCATION OF GRAVEL CAP

B.1.c RR Sites Map



Legend

- Open Site (ongoing cleanup)
- Closed Site (completed cleanup)
- Municipality
- State Boundaries
- County Boundaries
- Major Roads
  - Interstate Highway
  - State Highway
  - US Highway
- County and Local Roads
  - County HWY
  - Local Road
- Railroads
- Tribal Lands

Notes

0.5 0 0.25 0.5 Miles

NAD_1983_HARN_Wisconsin_TM

1: 15,840

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Note: Not all sites are mapped.

B.2.a
SOIL CONTAMINATION

KELLER PROPERTY

METCO
709 Gillette St, Suite 3
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Tel: (608) 781-8879
Fax: (608) 781-8893
Excellence through experience

MARINETTE,
WISCONSIN

DRAWN BY: ED DATE: 1/22/2015
MODIFIED BY: MM DATE: 4/13/2017

NOTE: INFORMATION BASED ON AVAILABLE DATA ACTUAL CONDITIONS MAY DIFFER

CITY OF MARINETTE PROPERTY

ESTIMATED EXTENT OF PETROLEUM CONTAMINATION IN UNSATURATED SOIL EXCEEDING NR720 NON-INDUSTRIAL DIRECT CONTACT RCLS

SLOPE DOWN TO MARSH

FORMER RAILROAD TRACKS - CANADIAN NATIONAL PROPERTY

OLD FENCE LINE

MARSH

GRAVEL

A. F

B. F

C

D

E

F

G

H

CONCRETE WALL

FMR PLATFORM

FMR LOADING PLAT-FORM

MW-1 MW-2 MW-3 MW-4 MW-5 MW-6

G-1 G-2 G-3 G-4 G-5 G-6 G-7 G-8 G-9 G-10 G-11 G-12 G-13 G-14 G-15 G-16 G-17 G-18 G-19 G-20 G-21 G-22 G-23 G-24/TW-24 G-25 G-26 G-27

SB1/TW1 SB2 SB3/TW2 SB4 SB5/TW3 SB6 SB7/TW4 SB8

AREA A: 190' x 40' x 1'

AREA B: 117' x 70' x 1'

CONCRETE

WAREHOUSE
102 WATER STREET

OVERHANG

ELEVATED LOADING DOCK

GRAVEL/GRASS

VACANT WOODED LOT - MARINETTE HOUSING AUTHORITY

FENCE

CRUSHED ROCK

CELL TOWER

SAND

ELECTRIC PANEL

ESTIMATED EXTENT OF PETROLEUM CONTAMINATION IN UNSATURATED SOIL EXCEEDING NR720 GW RCLS

ESTIMATED EXTENT OF PETROLEUM CONTAMINATION IN UNSATURATED SOIL EXCEEDING NR720 INDUSTRIAL DIRECT CONTACT RCLS

VACATED STREET

RESIDENTIAL

GRASS

WATER STREET

1ST ST

RESIDENTIAL

- WATER LINE
- SANITARY SEWER LINE
- STORM SEWER LINE
- NATURAL GAS LINE
- BURIED ELECTRIC LINE
- OVERHEAD UTILITIES
- TELEPHONE/CABLE LINE
- PROPERTY LINE
- SEWER MANHOLE
- STORM DRAIN
- PHASE 2 ESA SOIL BORING LOCATION
- GEOPROBE BORING LOCATION
- MONITORING WELL LOCATION
- TEMPORARY WELL LOCATION

SCALE:
1 INCH = 30 FEET
0 15 30

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B = 18,000-GAL KEROSENE (1921 SANBORN MAP)
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D = 6,000-GAL LUBRICATING OIL (1921 AND 1935 SANBORN MAP)
E = UNKNOWN CONTENTS (1969 AERIAL PHOTO AND 1975 TAX ASSESSORS RECORDS)
F = 18,000-GAL GASOLINE TANK (1952 SANBORN MAP)
G = PUMP HOUSE (1952 SANBORN MAP)
H = UNIDENTIFIED STRUCTURE/ POSSIBLE LOADING RACK (1952 SANBORN MAP)

- LOCATION OF GRAVEL CAP

B.2.b RESIDUAL SOIL CONTAMINATION

KELLER PROPERTY

METCO
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Excellence through experience

MARINETTE, WISCONSIN

DRAWN BY: ED DATE: 1/22/2015
MODIFIED BY: MH DATE: 4/13/2017

4TH

NOTE: INFORMATION BASED ON AVAILABLE DATA ACTUAL CONDITIONS MAY DIFFER

CITY OF MARINETTE PROPERTY

SLOPE DOWN TO MARSH

ESTIMATED EXTENT OF PETROLEUM CONTAMINATION IN UNSATURATED SOIL EXCEEDING NR720 NON-INDUSTRIAL DIRECT CONTACT RCLS

FORMER RAILROAD TRACKS - CANADIAN NATIONAL PROPERTY

OLD FENCE LINE

MARSH

GRAVEL

MW-3 G-7 G-8 G-19 MW-4 G-6 G-4 MW-5 G-2 G-3 G-20

A. F
B. F SBI/TWI
A. F
B. F SB2
G-9

CONCRETE WALL

EMR PLATFORM

C D E F G H

G-18 MW-2 MW-1 G-1 SB3/TW2 G-17

EMR LOADING PLAT-FORM

AREA A: 190' x 40' x 1'

CONCRETE

OVERHANG

WAREHOUSE
102 WATER STREET

AREA B: 117' x 70' x 1'

GRAVEL/GRASS

OLD FENCE LINE

VACANT WOODED LOT - MARINETTE HOUSING AUTHORITY

G-26 G-16 MW-6 G-15

FENCE
CRUSHED ROCK
CELL TOWER
SB8
FENCE
ELECTRIC PANEL

SAND

CONCRETE

ELEVATED LOADING DOCK

ESTIMATED EXTENT OF PETROLEUM CONTAMINATION IN UNSATURATED SOIL EXCEEDING NR720 GW RCLS

ESTIMATED EXTENT OF PETROLEUM CONTAMINATION IN UNSATURATED SOIL EXCEEDING NR720 INDUSTRIAL DIRECT CONTACT RCLS

VACATED STREET

RESIDENTIAL

GRASS

WATER STREET

1ST ST

RESIDENTIAL

- WATER LINE
- SANITARY SEWER LINE
- STORM SEWER LINE
- NATURAL GAS LINE
- BURIED ELECTRIC LINE
- OVERHEAD UTILITIES
- TELEPHONE/CABLE LINE
- PROPERTY LINE
- SEWER MANHOLE
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C = 200,000-GAL GASOLINE (1921 AND 1952 SANBORN MAP)
D = 6,000-GAL LUBRICATING OIL (1921 AND 1935 SANBORN MAP)
E = UNKNOWN CONTENTS (1969 AERIAL PHOTO AND 1975 TAX ASSESSORS RECORDS)
F = 18,000-GAL GASOLINE TANK (1952 SANBORN MAP)
G = PUMP HOUSE (1952 SANBORN MAP)
H = UNIDENTIFIED STRUCTURE/ POSSIBLE LOADING RACK (1952 SANBORN MAP)

- LOCATION OF GRAVEL CAP

B.3.a.I GEOLOGIC CROSS SECTION FIGURE

KELLER PROPERTY

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

MARINETTE, WISCONSIN

DRAWN BY: ED DATE: 1/22/2015
MODIFIED BY: MH DATE: 4/23/2007

47K

NOTE: INFORMATION BASED ON AVAILABLE DATA ACTUAL CONDITIONS MAY DIFFER

CITY OF MARINETTE PROPERTY
SLOPE DOWN TO MARSH
FORMER RAILROAD TRACKS - CANADIAN NATIONAL PROPERTY
ESTIMATED EXTENT OF SOIL CONTAMINATION EXCEEDING NR720 GW RCLS
PARCEL ID # 251-00948-003
PAL
A
A'
OLD FENCE LINE
ES
ESTIMATED EXTENT OF GROUNDWATER CONTAMINATION EXCEEDING NR140 ES AND/OR PAL
AREA A: 190' x 40' x 1'
AREA B: 117' x 70' x 1'
MARSH
GRAVEL
CONCRETE
FMR LOADING PLATFORM
FMR PLATFORM
CONCRETE WALL
OVERHANG
WAREHOUSE
102 WATER STREET
ELEVATED LOADING DOCK
GRAVEL/GRASS
VACATED STREET
RESIDENTIAL
FENCE
CRUSHED ROCK
CELL TOWER
ELECTRIC PANEL
SAND
PARCEL ID # 251-04092-000
ESTIMATED EXTENT OF SOIL CONTAMINATION EXCEEDING NR720 GW RCLS AND/OR DIRECT CONTACT
VACANT WOODED LOT - MARINETTE HOUSING AUTHORITY
GRASS
WATER STREET
IST ST
RESIDENTIAL

G-1 G-2 G-3 G-4 G-5 G-6 G-7 G-8 G-9 G-10 G-11 G-12 G-13 G-14 G-15 G-16 G-17 G-18 G-19 G-20 G-21 G-22 G-23 G-24/TW-24 G-25 G-26 G-27
MW-1 MW-2 MW-3 MW-4 MW-5 MW-6
SB1/TW1 SB2 SB3/TW2 SB4 SB5/TW3 SB6 SB7/TW4 SB8

- WATER LINE
- SANITARY SEWER LINE
- STORM SEWER LINE
- NATURAL GAS LINE
- BURIED ELECTRIC LINE
- OVERHEAD UTILITIES
- TELEPHONE/CABLE LINE
- PROPERTY LINE
- SEWER MANHOLE
- STORM DRAIN
- PHASE 2 ESA SOIL BORING LOCATION
- GEOPROBE BORING LOCATION
- MONITORING WELL LOCATION
- TEMPORARY WELL LOCATION

SCALE: 1 INCH = 30 FEET
0 15 30

KEY TO FORMER ASTS
A = 18,000-GAL GASOLINE (1921 SANBORN MAP)
B = 18,000-GAL KEROSENE (1921 SANBORN MAP)
C = 200,000-GAL GASOLINE (1921 AND 1952 SANBORN MAP)
D = 6,000-GAL LUBRICATING OIL (1921 AND 1935 SANBORN MAP)
E = UNKNOWN CONTENTS (1969 AERIAL PHOTO AND 1975 TAX ASSESSORS RECORDS)
F = 18,000-GAL GASOLINE TANK (1952 SANBORN MAP)
G = PUMP HOUSE (1952 SANBORN MAP)
H = UNIDENTIFIED STRUCTURE/ POSSIBLE LOADING RACK (1952 SANBORN MAP)

- LOCATION OF GRAVEL CAP

B.3.a.2 GEOLOGIC CROSS SECTION FIGURE

KELLER PROPERTY

METCO
709 Gillette St, Ste. 3
La CROSSE, WI 54603
Tel: (608) 781-8879
Fax: (608) 781-8893

MARINETTE, WISCONSIN

DRAWN BY: DP

DATE: 2/25/16

VERTICAL SCALE:
1 INCH = 6 FEET

6
3
0

HORIZONTAL SCALE:
1 INCH = 30 FEET

0 15 30

INFORMATION BASED ON AVAILABLE DATA. ACTUAL CONDITIONS MAY DIFFER.

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

GROUNDWATER SAMPLE RESULTS ARE PRESENTED IN PPB.

GROUNDWATER FLOW IS TOWARD THE NORTH.

NOTE: SOIL AND GROUNDWATER SAMPLE DATA IS BASED ON LABORATORY RESULTS FROM SAMPLES COLLECTED DURING THE FOLLOWING EVENTS:
- GEOPROBE PROJECT (05/18/2015 - 05/19/2015)
- DRILLING PROJECT (06/29/2015 - 11/23/2015)
- GROUNDWATER SAMPLING (1/8/2018)

- GEOPROBE BORING LOCATION
- GEOPROBE SOIL SAMPLE LOCATION
- MONITORING WELL LOCATION
- SOIL BORING SAMPLE LOCATION
- UST CLOSURE SOIL SAMPLING LOCATION

- WATERTABLE

PID - PHOTO IONIZATION DETECTOR
DRO - DIESEL RANGE ORGANICS
GRO - GASOLINE RANGE ORGANICS
B - BENZENE
E - ETHYLBENZENE
N - NAPHTHALENE
T - TOLUENE
TMB - TRIMETHYLBENZENE
X - XYLENE
B(a)a - BENZO(A)ANTHRACENE
B(a)p - BENZO(A)PYRENE
B(b)f - BENZO(B)FLUORANTHENE
C - CHRYSENE
D(a,h)a - DIBENZO(A,H)ANTHRACENE
I(1,2,3-cd)p - INDENO(1,2,3-CD)PYRENE

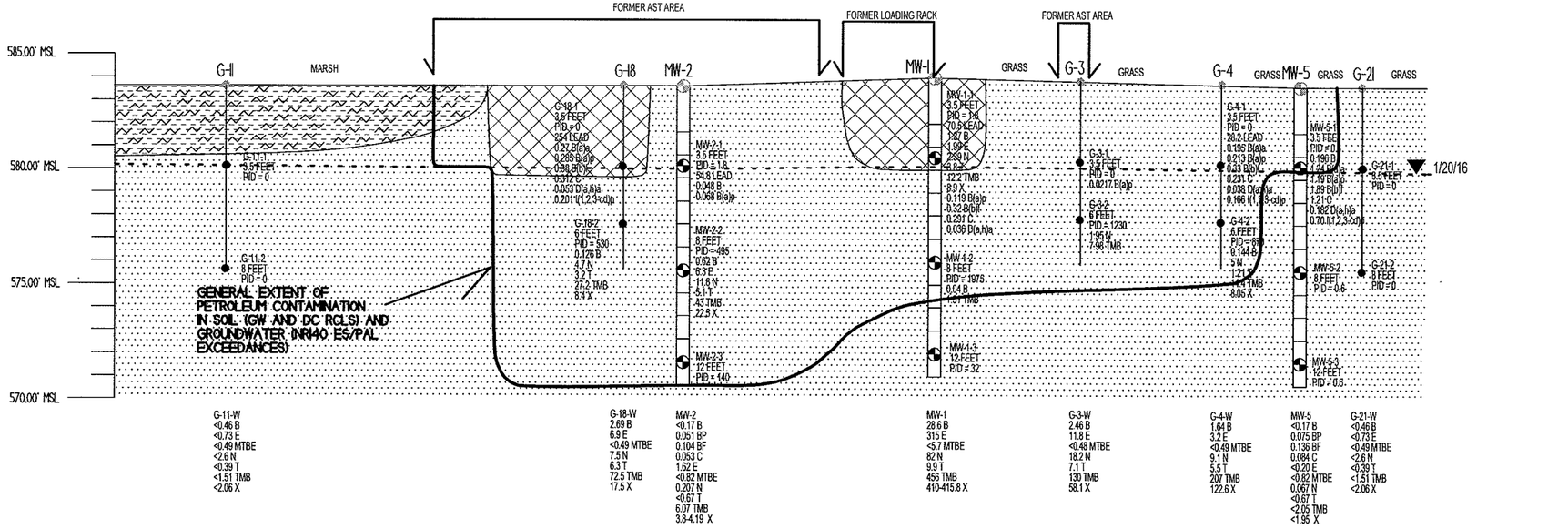
BLACK PEAT

BROWN TO GRAY TO TAN FINE TO MEDIUM GRAINED SAND

FILL (SAND, SILT AND GRAVEL)

A WEST

A' EAST



B.3.b GROUNDWATER ISOCONCENTRATION (1/8/18)

KELLER PROPERTY

MARINETTE, WISCONSIN

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

DRAWN BY: ED DATE: 1/22/2015
MODIFIED BY: MH DATE: 4/13/2017

NOTE: INFORMATION BASED ON AVAILABLE DATA ACTUAL CONDITIONS MAY DIFFER

CITY OF MARINETTE PROPERTY

SLOPE DOWN TO MARSH

FORMER RAILROAD TRACKS - CANADIAN NATIONAL PROPERTY

PAL

OLD FENCE LINE

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

AREA A: 190' x 40' x 1'

AREA B: 117' x 70' x 1'

ES

MARSH

GRAVEL

A. F

B. F

C

D

E

F

G

H

CONCRETE WALL

FMR PLATFORM

FMR LOADING PLATFORM

CONCRETE

WAREHOUSE 102 WATER STREET

OVERHANG

ELEVATED LOADING DOCK

GRAVEL/GRASS

VACANT WOODED LOT - MARINETTE HOUSING AUTHORITY

FENCE

CRUSHED ROCK

CELL TOWER

ELECTRIC PANEL

SAND

GRASS

VACATED STREET

RESIDENTIAL

WATER STREET

IST ST

G-1 G-2 G-3 G-4 G-5 G-6 G-7 G-8 G-9 G-10 G-11 G-12 G-13 G-14 G-15 G-16 G-17 G-18 G-19 G-20 G-21 G-22 G-23 G-24/TW-24 G-25 G-26 G-27

MW-1 MW-2 MW-3 MW-4 MW-5 MW-6

SB1/TW1 SB2 SB3/TW2 SB4 SB5/TW7 SB6 SB7/TW4 SB8

- WATER LINE
- SANITARY SEWER LINE
- STORM SEWER LINE
- NATURAL GAS LINE
- BURIED ELECTRIC LINE
- OVERHEAD UTILITIES
- TELEPHONE/CABLE LINE
- PROPERTY LINE
- SEWER MANHOLE
- STORM DRAIN
- PHASE 2 ESA SOIL BORING LOCATION
- GEOPROBE BORING LOCATION
- MONITORING WELL LOCATION
- TEMPORARY WELL LOCATION

SCALE: 1 INCH = 30 FEET
0 15 30

KEY TO FORMER ASTS
A = 18,000-GAL GASOLINE (1921 SANBORN MAP)
B = 18,000-GAL KEROSENE (1921 SANBORN MAP)
C = 200,000-GAL GASOLINE (1921 AND 1952 SANBORN MAP)
D = 6,000-GAL LUBRICATING OIL (1921 AND 1935 SANBORN MAP)
E = UNKNOWN CONTENTS (1969 AERIAL PHOTO AND 1975 TAX ASSESSORS RECORDS)
F = 18,000-GAL GASOLINE TANK (1952 SANBORN MAP)
G = PUMP HOUSE (1952 SANBORN MAP)
H = UNIDENTIFIED STRUCTURE/ POSSIBLE LOADING RACK (1952 SANBORN MAP)

= LOCATION OF GRAVEL CAP

B.3.c GROUNDWATER FLOW DIRECTION (1/8/18)

KELLER PROPERTY

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

MARINETTE, WISCONSIN

DRAWN BY: ED DATE: 1/22/2015
MODIFIED BY: MH DATE: 4/03/2017

NOTE: INFORMATION BASED ON AVAILABLE DATA ACTUAL CONDITIONS MAY DIFFER

CITY OF MARINETTE PROPERTY

SLOPE DOWN TO MARSH

FORMER RAILROAD TRACKS - CANADIAN NATIONAL PROPERTY

580.15' MSL

580.14' MSL

580.13' MSL

580.16' MSL

580.11' MSL

580.11' MSL

580.14' MSL

580.12' MSL

580.10' MSL

580.10' MSL

AREA A: 190' x 40' x 1'

AREA B: 117' x 70' x 1'

G-1 G-2 G-3 G-4 G-5 G-6 G-7 G-8 G-9 G-10 G-11 G-12 G-13 G-14 G-15 G-16 G-17 G-18 G-19 G-20 G-21 G-22 G-23 G-24/TW-24 G-25 G-26 G-27

MW-1 MW-2 MW-3 MW-4 MW-5 MW-6

SB1/TW1 SB2 SB3/TW2 SB4 SB5/TW3 SB6 SB7/TW4 SB8

A. F B. F A. F B. F C D E E F G H

CONCRETE WALL

FMR PLATFORM

FMR LOADING PLAT-FORM

MARSH

GRAVEL

GRAVEL

GRAVEL

GRAVEL/GRASS

GRAVEL/GRASS

CONCRETE

CONCRETE

CONCRETE

OVERHANG

WAREHOUSE
102 WATER STREET

ELEVATED LOADING DOCK

OLD FENCE LINE

VACANT WOODED LOT - MARINETTE HOUSING AUTHORITY

FENCE

CRUSHED ROCK

CELL TOWER

FENCE

ELECTRIC PANEL

SAND

GRASS

VACATED STREET

RESIDENTIAL

RESIDENTIAL

WATER STREET

1ST ST

- WATER LINE
- SANITARY SEWER LINE
- STORM SEWER LINE
- NATURAL GAS LINE
- BURIED ELECTRIC LINE
- OVERHEAD UTILITIES
- TELEPHONE/CABLE LINE
- PROPERTY LINE
- SEWER MANHOLE
- STORM DRAIN
- PHASE 2 ESA SOIL BORING LOCATION
- GEOPROBE BORING LOCATION
- MONITORING WELL LOCATION
- TEMPORARY WELL LOCATION

SCALE:
1 INCH = 30 FEET
0 15 30

KEY TO FORMER ASTS
A = 18,000-GAL GASOLINE (1921 SANBORN MAP)
B = 18,000-GAL KEROSENE (1921 SANBORN MAP)
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E = UNKNOWN CONTENTS (1969 AERIAL PHOTO AND 1975 TAX ASSESSORS RECORDS)
F = 18,000-GAL GASOLINE TANK (1952 SANBORN MAP)
G = PUMP HOUSE (1952 SANBORN MAP)
H = UNIDENTIFIED STRUCTURE/ POSSIBLE LOADING RACK (1952 SANBORN MAP)

- LOCATION OF GRAVEL CAP

B.3.d
MONITORING WELLS
KELLER PROPERTY

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

MARINETTE, WISCONSIN
DRAWN BY: ED DATE: 1/22/2015
MODIFIED BY: MM DATE: 4/13/2017

NOTE: INFORMATION BASED ON AVAILABLE DATA ACTUAL CONDITIONS MAY DIFFER

CITY OF MARINETTE PROPERTY

SLOPE DOWN TO MARSH

FORMER RAILROAD TRACKS - CANADIAN NATIONAL PROPERTY

PARCEL ID # 251-00948-003

OLD FENCE LINE

MW-3 MW-4 MW-5

G-24/TW-24

GRAVEL

A. F B. F A. F B. F

CONCRETE WALL

FMR PLATFORM

C E E E F

MW-2

G MW-1

D

H

FMR LOADING PLAT-FORM

AREA A: 190' x 40' x 1'

MARSH

CONCRETE

OVERHANG

AREA B: 117' x 70' x 1'

WAREHOUSE
102 WATER STREET

GRAVEL

GRAVEL

MW-6

OLD FENCE LINE

GRAVEL/GRASS

GRAVEL/GRASS

VACANT WOODED LOT - MARINETTE HOUSING AUTHORITY

CONCRETE

ELEVATED LOADING DOCK

VACATED STREET

RESIDENTIAL

FENCE

CRUSHED ROCK

CELL TOWER

PARCEL ID # 251-04692-000

SAND

FENCE

ELECTRIC PANEL

CONCRETE

GRASS

WATER STREET

IST ST

RESIDENTIAL

RESIDENTIAL

- WATER LINE
- SANITARY SEWER LINE
- STORM SEWER LINE
- NATURAL GAS LINE
- BURIED ELECTRIC LINE
- OVERHEAD UTILITIES
- TELEPHONE/CABLE LINE
- PROPERTY LINE
- SEWER MANHOLE
- STORM DRAIN

SCALE:
1 INCH = 30 FEET
0 15 30

- MONITORING WELL LOCATION - PROPOSED TO BE ABANDONED
- TEMPORARY WELL LOCATION - PROPOSED TO BE ABANDONED

KEY TO FORMER ASTS
A = 18,000-GAL GASOLINE (1921 SANBORN MAP)
B = 18,000-GAL KEROSENE (1921 SANBORN MAP)
C = 200,000-GAL GASOLINE (1921 AND 1952 SANBORN MAP)
D = 6,000-GAL LUBRICATING OIL (1921 AND 1935 SANBORN MAP)
E = UNKNOWN CONTENTS (1969 AERIAL PHOTO AND 1975 TAX ASSESSORS RECORDS)
F = 18,000-GAL GASOLINE TANK (1952 SANBORN MAP)
G = PUMP HOUSE (1952 SANBORN MAP)
H = UNIDENTIFIED STRUCTURE/ POSSIBLE LOADING RACK (1952 SANBORN MAP)

- LOCATION OF GRAVEL CAP

Attachment C/Documentation of Remedial Action

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

- Site Investigation Report – May 26, 2016
- Letter Report – May 12, 2017
- Letter Report – January 31, 2018

C.2 Investigative waste

C.3 Provide a description of the methodology used along with all supporting documentation if the Residual Contaminant Levels are different than those contained in the Department's RCL Spreadsheet available at: http://dnr.wi.goc/topic/brownfields.Professionals.html\ - Residual Contaminant Levels (RCLs) were established in accordance with NR720.10 and NR720.12. Soil RCLs for the protection of the groundwater pathway and for non-industrial direct contact were taken from the RR programs RCL speadsheet.

C.4 Construction documentation – No Remedial actions and/or interim actions specified in s.NR724.01(1) occurred at this site.

C.5 Decommissioning of Remedial Systems – No remedial systems were installed as part of this site investigation.

C.6 Other – Not applicable

C.2 Investigative Waste

DKS Transport Services, LLC
N7349 548th Street
Menomonie, WI 54751
715-556-2604

INVOICE

6115 20 16

CUSTOMER: KEN Keller % METCO
709 Gillette St
La Crosse WI 54603

JOB NAME: Keller Property
Marquette WI

☐ CASH ☐ CHECK # _____ ☒ IN-HOUSE ACCOUNT

QUANTITY DATE	QUANTITY SHIPPED	DESCRIPTION	QTY.	UNIT PRICE		AMOUNT	
	1	Mobilization	1	287	70	287	70
	3	Haul soil drums to Advanced Disposal - Eau Claire WI	3	108	15	324	45
	1	Haul water drum to Advanced Disposal - Eau Claire WI	1	42	11	42	11
		Thank You					
				TOTAL		654	26

Due upon receipt of invoice.
1.5% per month Service Charge (18% Annual Percentage Rate) will be added to past due accounts.

SIGNATURE _____ 165

Env. Waste Disposal
Received 6/16/16
JK

Attachment D/Maintenance Plan(s)

D.1 Descriptions of maintenance action(s) required for maximizing effectiveness of the engineered control, vapor mitigation system, feature or other action for which maintenance is required

D.2 Location map(s) which show(s)

D.3 Photographs

D.4 Inspection log

D.1 Description of Maintenance Action(s)

CAP MAINTENANCE PLAN

May 1, 2018

Property Located at:
102 Water Street
Marinette, WI 54143

WDNR BRRTS# 02-38-560993

TAX KEY# 251-04692-000

Introduction

This document is the Maintenance Plan for a gravel cap 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 existing cap occupying the area over the contaminated groundwater plume or soil on-site.

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

- The case file in the DNR Northeast 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 and
- The DNR project manager for Marinette County.

Description of Contamination

Soil contaminated by Petroleum Volatile Organic Compounds (PVOCs) and Polynuclear Aromatic Hydrocarbons (PAHs) is located at a depth of 0-4 feet below ground surface (bgs) in the area of the former AST systems. The extent of soil and groundwater contamination is shown on Attachment D.2.

Description of the Cap to be maintained

The Cap consists of gravel (1 foot thick) and exists in the area of the former AST systems to the west and north of the on-site building, as shown on Attachment D.2.

Cover Barrier Purpose

The gravel cap over the contaminated soil and groundwater serves as a barrier to prevent direct human contact with residual soil contamination that might otherwise pose a threat to human health. Based on the current and future use of the property, the barrier should function as intended unless disturbed.

Annual Inspection

The gravel cap overlying the contaminated soil and groundwater and as depicted in Attachment D.2 will be inspected once a year, normally in the spring after all snow and ice is gone, for deterioration, cracks and other potential problems that can cause exposure to underlying soils or additional infiltration through asphalt or concrete. 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 Form 4400-305 Continuing Obligations and Maintenance Log. The log will include recommendations for necessary repair of any areas where underlying soils are exposed and where infiltration from the surface will not be effectively minimized. Once repairs are completed, they will be documented in the inspection log. A copy of the 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.

Note: The WDNR may, in some instances, require in the case closure letter that the inspection log be submitted at least annually after every inspection. If the case closure letter requires that, then a copy of the inspection log must be submitted to the WDNR at least annually after every inspection.

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

The property owner, in order to maintain the integrity of the gravel cap, 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 the gravel cap is required as shown on the attached map, 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
May 2018

Current Site Owner and Operator:
Ken Keller
309 Ogden Street
Marinette, WI 54143

Signature: _____
(DNR may request signature of affected property owners, on a case-by-case basis)

Consultant:
METCO
Ron Anderson
709 Gillette Street, Suite 3
La Crosse, WI 54603
(608) 781-8879

WDNR:
Tom Verstegen
625 E. County Rd Y
Oshkosh, WI 54901
(920) 424-0025

D.2
LOCATION MAP
KELLER PROPERTY

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

MARINETTE, WISCONSIN

DRAWN BY: ED DATE: 1/22/2015
MODIFIED BY: MH DATE: 4/03/2017

NOTE: INFORMATION BASED ON AVAILABLE DATA ACTUAL CONDITIONS MAY DIFFER

CITY OF MARINETTE PROPERTY

SLOPE DOWN TO MARSH

ESTIMATED EXTENT OF PETROLEUM CONTAMINATION IN UNSATURATED SOIL EXCEEDING NR720 NON-INDUSTRIAL DIRECT CONTACT RCLS

FORMER RAILROAD TRACKS - CANADIAN NATIONAL PROPERTY

OLD FENCE LINE

AREA A: 190' x 40' x 1'

AREA B: 117' x 70' x 1'

MARSH

VACANT WOODED LOT - MARINETTE HOUSING AUTHORITY

GRAVEL

CONCRETE

WAREHOUSE 102 WATER STREET

OVERHANG

GRAVEL/GRASS

VACATED STREET

RESIDENTIAL

FENCE

CRUSHED ROCK

CELL TOWER

SAND

ELEVATED LOADING DOCK

FMR LOADING PLAT-FORM

CONCRETE WALL

FMR PLATFORM

ESTIMATED EXTENT OF PETROLEUM CONTAMINATION IN UNSATURATED SOIL EXCEEDING NR720 GW RCLS

ESTIMATED EXTENT OF PETROLEUM CONTAMINATION IN UNSATURATED SOIL EXCEEDING NR720 INDUSTRIAL DIRECT CONTACT RCLS

ELECTRIC PANEL

GRASS

WATER STREET

1ST ST

RESIDENTIAL

- WATER LINE
- SANITARY SEWER LINE
- STORM SEWER LINE
- NATURAL GAS LINE
- BURIED ELECTRIC LINE
- OVERHEAD UTILITIES
- TELEPHONE/CABLE LINE
- PROPERTY LINE
- SEWER MANHOLE
- STORM DRAIN
- PHASE 2 ESA SOIL BORING LOCATION
- GEOPROBE BORING LOCATION
- MONITORING WELL LOCATION
- TEMPORARY WELL LOCATION

SCALE:
1 INCH = 30 FEET
0 15 30

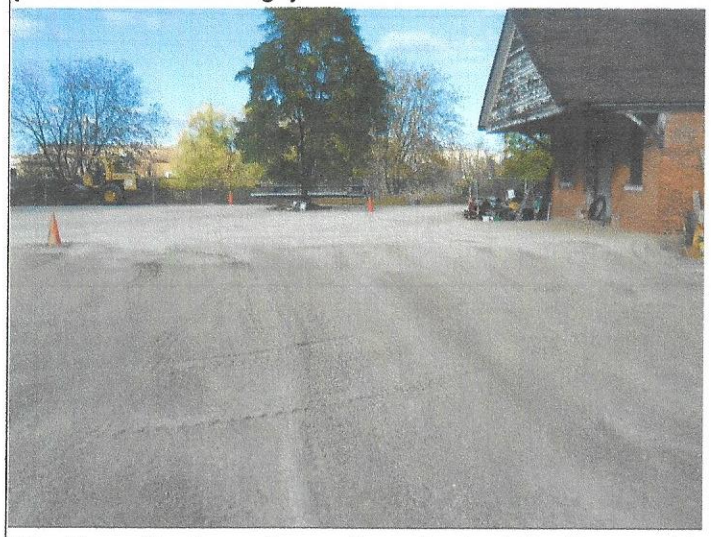
KEY TO FORMER ASTS
A = 18,000-GAL GASOLINE (1921 SANBORN MAP)
B = 18,000-GAL KEROSENE (1921 SANBORN MAP)
C = 200,000-GAL GASOLINE (1921 AND 1952 SANBORN MAP)
D = 6,000-GAL LUBRICATING OIL (1921 AND 1935 SANBORN MAP)
E = UNKNOWN CONTENTS (1969 AERIAL PHOTO AND 1975 TAX ASSESSORS RECORDS)
F = 18,000-GAL GASOLINE TANK (1952 SANBORN MAP)
G = PUMP HOUSE (1952 SANBORN MAP)
H = UNIDENTIFIED STRUCTURE/ POSSIBLE LOADING RACK (1952 SANBORN MAP)

- LOCATION OF GRAVEL CAP (AREA OF CAP TO BE MAINTAINED)

{Click to Add/Edit Image} Date added: 05/01/2018

Title: Photo #1: Area of cap to be maintained (looking east)

{Click to Add/Edit Image} Date added: 05/01/2018



Title: Photo #1: Area of cap to be maintained (looking north)

{Click to Add/Edit Image} Date added: 05/01/2018

Title: Photo #1: Area of cap to be maintained (looking northwest)

{Click to Add/Edit Image} Date added: 05/01/2018

Title: Photo #1: Area of cap to be maintained (looking southeast)

D.3 photographs

State of Wisconsin
Department of Natural Resources
dnr.wi.gov

Continuing Obligations Inspection and Maintenance Log

Form 4400-305 (2/14)

D.4 Inspection Log

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

Activity (Site) Name: Keller Property

BRRTS No.: 02-38-560993

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

● annually
○ semi-annually
○ other – specify ____________________

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

Inspection Date	Inspector Name	Item	Describe the condition of the item that is being inspected	Recommendations for repair or maintenance	Previous recommendations implemented?	Photographs taken and attached?
		☐ monitoring well ☐ cover/barrier ☐ vapor mitigation system ☐ other:			○ Y ○ N	○ Y ○ N
		☐ monitoring well ☐ cover/barrier ☐ vapor mitigation system ☐ other:			○ Y ○ N	○ Y ○ N
		☐ monitoring well ☐ cover/barrier ☐ vapor mitigation system ☐ other:			○ Y ○ N	○ Y ○ N
		☐ monitoring well ☐ cover/barrier ☐ vapor mitigation system ☐ other:			○ Y ○ N	○ Y ○ N
		☐ monitoring well ☐ cover/barrier ☐ vapor mitigation system ☐ other:			○ Y ○ N	○ Y ○ N
		☐ monitoring well ☐ cover/barrier ☐ vapor mitigation system ☐ other:			○ Y ○ N	○ Y ○ N

Attachment E/Monitoring Well Information

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

Attachment F/Source Legal Documents

F.1 Deeds – Source Property

F.2 Certified Survey Map

F.3 Verification of Zoning

F.4 Signed Statement

F.1 Deed - Source Property

DOCUMENT NO. 439815

WARRANTY DEED
STATE OF WISCONSIN—FORM 9

THIS SPACE RESERVED FOR RECORDING DATA

RECORDED
JKT 1463 M07
1994 MAR -1 PM 2:13

THIS INDENTURE, Made by CLAYTON STRANGE

grantor of Menominee County, Michigan, hereby conveys and warrants to KENNETH C. KELLER and KATHY M. KELLER, his wife, as joint tenants

grantees of Marinette County, Wisconsin for the sum of One Dollar and other good and valuable consideration

RETURN TO Abstract & Land 4.00

the following tract of land in Marinette County, Wisconsin:

The Easterly One-half of Block 56 of Section "B" of Menominee River Lumber Company's First Addition to the Village of Menekaune, now City of Marinette, according to the recorded plat thereof, described as: Beginning at the Southeast corner of said block; thence Westerly, on the South line thereof, 200 feet; thence Northerly, parallel with the East line of said block, 167.1 feet to the right-of-way of C. & N.W. Railway spur track; thence Easterly parallel with the South line of said right-of-way, to the East line of said Block 56; thence Southerly, on the East line of said block, 174.7 feet to the place of beginning, situate in the City of Marinette, Marinette County, Wisconsin.

This is not homestead property.

439815 RECORDED 1994 MAR -1 PM 2:13 REGISTER OF DEEDS OF MARINETTE COUNTY, WI

TRANSFER $8.00 FEE MARINETTE COUNTY

In Witness Whereof, the said grantor has hereunto set his hand and seal this 29th day of February, A. D., 19 94

Clayton Strange (SEAL)

SIGNED AND SEALED IN PRESENCE OF

(SEAL)

(SEAL)

(SEAL)

State of Wisconsin, Marinette County. } Personally came before me, this 29th day of February, A. D., 19 94, the above named Clayton Strange

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

T. P. Schwaba
Notary Public, Marinette County, Wis.

My commission (expires) (is) Permanent

THIS INSTRUMENT WAS DRAFTED BY

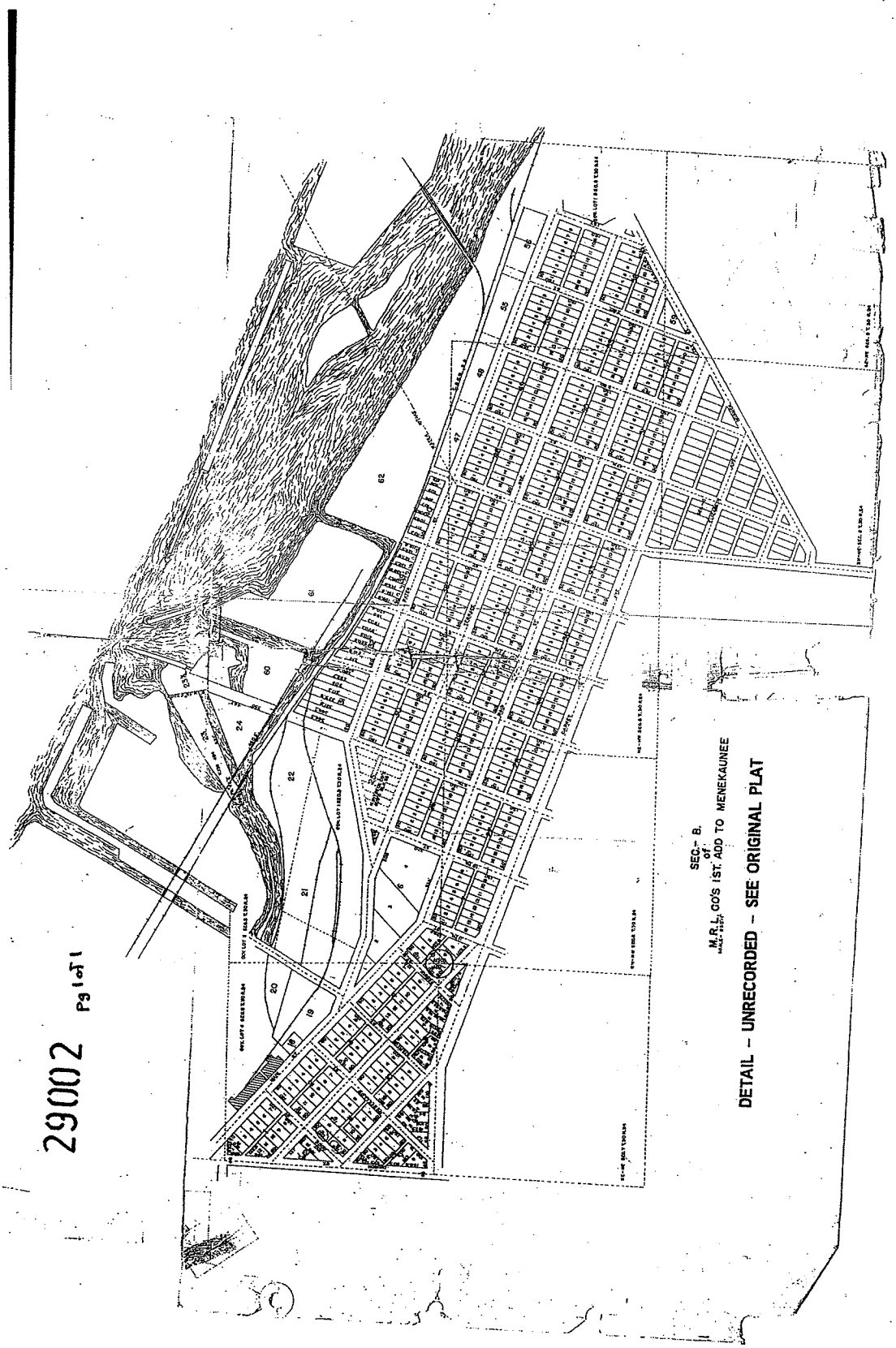
THOMAS P. SCHWABA

(Section 59.51 (2) of the Wisconsin Statutes provides that all instruments to be recorded shall have plainly printed or typewritten thereon the name of the grantor, grantee, witness and notary. Section 59.515 similarly requires that the name of the person who, or governmental agency which, drafted such instrument, shall be printed, typewritten, stamped or written thereon in a legible manner.)

WARRANTY DEED — STATE OF WISCONSIN — FORM No. 9 — Wisconsin Legal Blank Company, Milwaukee, Wis.

[illegible] $889.30 (3) (b)

F. 2 Certified Survey Map



F.3 Verification of Zoning

Marinette County Parcel Detail

Owner data last updated: 05/04/2018

Parcel Number: 251-04692.000 **Site Address: 102 WATER ST**

Owner Information:	KELLER KENNETH C KELLER KATHY M
Mailing Address:	309 OGDEN ST MARINETTE, WI 54143-2927

Taxing Jurisdiction:	CITY OF MARINETTE
School District:	MARINETTE
Vocational District:	NWTC
Other (if any):	TIF DISTRICT 3

Section	Town	Range
8	30	24

Plat/CSM MRL CO 1ST ADD
Lot: Block
Document Number:
Jacket/Volume: J01463 Image/Page: 07

Abbreviated Legal Description	Acres
MRL CO 1ST ADD SEC B E1/2 BLK 56	0.8

Assessment Year: 2017

Land	Forest Crop Land	Improvements	Total Assessed Value	Fair Market Value
20400	0	20000	40400	41300

Assessment Breakdown	Acres	Land	Improvements
COMMERCIAL	0.8	20400	20000

Tax Year: 2017

Net Tax	886.19
Special Use* (+)	0
Lottery Credit (-)	0
First Dollar Credit (-)	62.3
Total Tax	823.89

* Special Use may inlcude omitted tax, PFC/MFL, special assessments or special charges.

revised12/12/2012

F.4. Signed Statement

WDNR BRRTS Case #: 02-38-560993

WDNR Site Name: Keller Property

Geographic Information System (GIS) Registry of Closed Remediation Sites

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

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

Responsible Party:

Kenneth C Keller Owner
(print name/title)

Kenneth C Keller 5-30-18
(signature) (date)

Tracking Number: 70151660000043432855

Remove ×

Your item was delivered to the front desk, reception area, or mail room at 9:43 am on June 30, 2018 in STEVENS POINT, WI 54481.

Status

Delivered

June 30, 2018 at 9:43 am
Delivered, Front Desk/Reception/Mail Room
STEVENS POINT, WI 54481

Delivered

Tracking History

June 30, 2018, 9:43 am
Delivered, Front Desk/Reception/Mail Room
STEVENS POINT, WI 54481
Your item was delivered to the front desk, reception area, or mail room at 9:43 am on June 30, 2018 in STEVENS POINT, WI 54481.

June 29, 2018, 9:36 pm
Departed USPS Regional Facility
GREEN BAY WI DISTRIBUTION CENTER

June 29, 2018, 3:41 pm
Arrived at USPS Regional Facility
GREEN BAY WI DISTRIBUTION CENTER

June 29, 2018
In Transit to Next Facility

Attachment G/Notification to Owners of Impacted Properties

G.1 Deeds – Impacted Property(s)

G.2 Certified Survey Map

G.3 Verification of Zoning

G.4 Signed Statement

AFFECTED A PROPERTY

RIGHT-OF-WAY

Notification of Continuing Obligations and Residual Contamination
Form 4400-286 (9/15)

The affected property is:

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

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

Contact Information

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

Responsible Party Name: Ken Keller

Contact Person Last Name	First	MI	Phone Number (include area code)
Keller	Ken		(715) 923-0449

Address	City	State	ZIP Code
309 Ogden Street	Marinette	WI	54143

E-mail: KCK-KMK@new.rr.com

Name of Party Receiving Notification:

Business Name, if applicable: Canadian National Railroad

Title	Last Name	First	MI	Phone Number (include area code)
Mr.	Collins	Ken		(715) 210-0416

Address	City	State	ZIP Code
1625 Depot Street	Stevens Point	WI	54481

Site Name and Source Property Information:

Site (Activity) Name: Keller Property

Address	City	State	ZIP Code
102 Water Street	Marinette	WI	54143

DNR ID # (BRRTS#)	(DATCP) ID #
02-38-560993	

Contacts for Questions:

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

Environmental Consultant: METCO

Contact Person Last Name	First	MI	Phone Number (include area code)
Powell	Jason		(608) 781-8879

Address	City	State	ZIP Code
709 Gillette Street Suite 3	La Crosse	WI	54603

E-mail: jasonp@metcohq.com

Department Contact:

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

Department of: Natural Resources (DNR) Office: Oshkosh

Address	City	State	ZIP Code
625 E County Rd Y STE 700	Oshkosh	WI	54901

Contact Person Last Name	First	MI	Phone Number (include area code)
Verstegen	Tom		(920) 424-0025

E-mail (Firstname.Lastname@wisconsin.gov): Thomas.Verstegen@wisconsin.gov

AFFECTED A PROPERTY

RIGHT-OF-WAY

Notification of Continuing Obligations and Residual Contamination
Form 4400-286 (9/15)

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

KEEP THIS DOCUMENT WITH YOUR PROPERTY RECORDS

1625 Depot Street
Stevens Point, WI, 54481

Dear Mr. Collins:

I am providing this letter to inform you of the location and extent of contamination remaining on your property, and of certain long-term responsibilities (continuing obligations) for which you may become responsible.
I have investigated a release of:
petroleum
on 102 Water Street, Marinette, WI, 54143 that has shown that contamination has migrated onto your property.
I have responded to the release and will be requesting that the Department of Natural Resources (DNR) grant case closure. Closure means that the DNR will not be requiring any further investigation or cleanup action to be taken. However, continuing obligations may be imposed as a condition of closure approval.

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

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

The DNR will not review my closure request for at least 30 days after the date of receipt of this letter. As an affected property owner, you have a right to contact the DNR to provide any technical information that you may have that indicates that closure should not be granted for this site. If you would like to submit any information that is relevant to this closure request, or if you want to waive the 30 day comment period, you should mail that information to the DNR contact: 625 E County Rd Y STE 700, Oshkosh, WI, 54901, or at Thomas.Verstegen@wisconsin.gov.

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

The responses included
a gravel capping project (1,136.12 tons of gravel) and groundwater monitoring.
The continuing obligations I am proposing that affect your property are listed below, under the heading **Continuing Obligations**. Under s. 292.12 (5), Wis. Stats., current and future owners and occupants of this property are responsible for complying with continuing obligations imposed as part of an approved closure.

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

Contract for responsibility for continuing obligation:

Before I request closure, I will need to inform the DNR as to whom will be responsible for the continuing obligation/s on your property.
No agreement or contract has been worked out between the RP and affected property owner.

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

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

AFFECTED A PROPERTY

RIGHT-OF-WAY

Remaining Contamination:

Soil Contamination:

Soil contamination remains at :
Along the Canadian National railroad right-of-way of the former railroad tracks and the area of soil borings G-6, G-7, MW-3, MW-4, and MW-5

The remaining contaminants include:
PVOC's, PAH, and Lead.

at levels which exceed the soil standards found in ch. NR 720, Wis. Adm. Code. The following steps have been taken to address any exposure to the remaining soil contamination.
Installation of a gravel cap and natural attenuation.

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

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

Residual Soil Contamination:

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

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

Contaminated soil may be managed in-place, in accordance with ch. NR 718, Wis. Adm. Code, with prior DNR approval. In addition, all current and future property owners and occupants of the property and right-of-way holders need to be aware that excavation of the contaminated soil may pose an inhalation or other direct contact hazard and as a result special precautions may need to be taken during excavation activities to prevent a health threat to humans.

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

Maintenance and Audits of Continuing Obligations:

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

GIS Registry and Well Construction Requirements:

If this site is closed, all properties within the site boundaries where contamination remains, or where a continuing obligation is applied, will be listed on the Bureau for Remediation and Redevelopment Tracking System (BRRTS) on the Web, at http://dnr.wi.gov/topic/Brownfields/clean.html. Inclusion on this database provides public notice of remaining contamination and of any continuing obligations. Documents can be viewed on this database, and include final closure letters, site maps and any applicable maintenance plans. The location of the site may also be viewed on the Remediation and Redevelopment Sites Map (RR Sites Map), on the "GIS Registry" layer, at the same internet address listed above.

DNR approval prior to well construction or reconstruction is required for all sites included in the GIS Registry, in accordance with s. NR 812.09 (4) (w), Wis. Adm. Code. This requirement applies to private drinking water wells and high capacity wells. Special well construction standards may be necessary to protect the well from the remaining contamination. Well drillers need to first obtain approval from a regional water supply specialist in DNR's Drinking

AFFECTED A PROPERTY

RIGHT-OF-WAY

Site Closure:
If the DNR grants closure, you will receive a letter which defines the specific continuing obligations on your property. The status of the site (open or closed) may also be checked by searching BRRTS on the Web. You may view or download a copy of the closure letter (sent to the responsible party) from BRRTS on the Web. You may also request a copy of the closure letter from the **responsible party** or by writing to the DNR contact, at Tom Verstegen, Thomas. Verstegen@wisconsin.gov, (920) 424-0025 . The final closure letter will contain a description of the continuing obligation, any prohibitions on activities and will include any applicable maintenance plan.

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

Kenneth C Keller Date Signed 6-25-18
Signature of responsible party/environmental consultant for the responsible party

Attachments
Contact Information
Legal Description for each Parcel:

Factsheets:
RR 819, Continuing Obligations for Environmental Protection

AFFECTED
A
PROPERTY

RIGHT-OF-WAY

SENDER: *COMPLETE THIS SECTION*

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Ken Collins
1625 Depot Street
Stevens Point, WI 54481

9590 9403 0958 5223 6296 51

2. Article Number *(Transfer from service label)*
7015 1660 0000 4343 2855

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X
☐ Agent
☐ Addressee

B. Received by *(Printed Name)*

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

Note:
Received unsigned card back at MSTCO's office on 7/5/18.

3. Service Type
- ☐ Adult Signature
- ☐ Adult Signature Restricted Delivery
- X Certified Mail®
- ☐ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Collect on Delivery Restricted Delivery
- ☐ ed Mail
- ☐ l Mail Restricted Delivery
- 500)
- ☐ Priority Mail Express®
- ☐ Registered Mail™
- ☐ Registered Mail Restricted Delivery
- ☐ Return Receipt for Merchandise
- ☐ Signature Confirmation™
- ☐ Signature Confirmation Restricted Delivery

PS Form 3811, July 2015 PSN 7530-02-000-9053 Domestic Return Receipt

AFFECTED
A
PROPERTY

RIGHT-OF-WAY

Wednesday, June 5, 2019 7:40 AM

Tracking Number: 70151660000043432855

Remove ×

Your item was delivered to the front desk, reception area, or mail room at 9:43 am on June 30, 2018 in STEVENS POINT, WI 54481.

Status

Delivered

June 30, 2018 at 9:43 am
Delivered, Front Desk/Reception/Mail Room
STEVENS POINT, WI 54481

Delivered

Tracking History

June 30, 2018, 9:43 am
Delivered, Front Desk/Reception/Mail Room
STEVENS POINT, WI 54481
Your item was delivered to the front desk, reception area, or mail room at 9:43 am on June 30, 2018 in STEVENS POINT, WI 54481.

June 29, 2018, 9:36 pm
Departed USPS Regional Facility
GREEN BAY WI DISTRIBUTION CENTER

June 29, 2018, 3:41 pm
Arrived at USPS Regional Facility
GREEN BAY WI DISTRIBUTION CENTER

June 29, 2018
In Transit to Next Facility

AFFECTED A PROPERTY

RIGHT-OF-WAY

VOL 5 PAGE 451

WARRANTY DEED. A. WHITTEMORE & Co., Stationers, Milwaukee.

This Indenture, Made the Thirty first day of December in the year of our Lord one thousand eight hundred and Sixty three between John P Jacobs and Margaret his wife of the County of Oconto and State of Wisconsin parties of the first part and Jonathon Cox Hall of Oconto County and State of Wisconsin party of the second part

Witnesseth, That the said parties of the first part, for and in consideration of the sum of Two hundred Dollars to them in hand paid by the said part of the second part, the receipt whereof is hereby confessed and acknowledged, ha ve given, granted, bargained, sold, remised, released, aliened, conveyed and confirmed, and by these presents do give, grant, bargain, sell, remise, release, alien, convey and confirm unto the said part of the second part his heirs and assigns forever, all that certain tract piece or parcel of land Situated lying and being in the County of Oconto State of Wisconsin and particularly described as follows to wit Beginning at a point on the South line of the S.E. 1/4 of the N.W. 1/4 of Section 6 Town 30 Range 21 E. 1.51 chains West of the S.E. corner of said forty & running Thence N. 2° 1/2 E. parallel with the East line of said forty about 12.48 chains to a line now established thence N. 65° W. along said line 10.03 chains to a point in the State Road thence Continuing said line last mentioned to west side of State Road & to the boundary of a piece of land now owned and cultivated by J. C. Hall, thence South Westerly along said Halls lands to South line of said forty, thence S. 89° 25' E. along the South line of said forty to place of beginning Containing nineteen & one half acres be the same more or less

Together with all and singular the Hereditaments and Appurtenances thereunto belonging, or in any wise appertaining; and all the estate, right, title, interest, claim, or demand whatsoever of the said part of the first part, either in Law or Equity, either in possession or expectancy of, in and to the above bargained premises, and their Hereditaments and Appurtenances. TO HAVE AND TO HOLD the said premises as above described, with the Hereditaments and Appurtenances, unto the said part of the second part, and to his heirs and assigns forever.

AND THE SAID John P Jacobs for himself his heirs, executors and administrators, do covenant, grant, bargain and agree, to and with the said part of the second part, his heirs and assigns, that at the time of the ensealing and delivery of those presents they are well seized of the premises above described, as of a good, sure, perfect, absolute, and indefeasible estate of inheritance in the Law, in fee simple, and that the same are free and clear from all incumbrances whatever, and that the above bargained premises, in the quiet and peaceful possession of the said part of the second part his heirs and assigns, against all and every person or persons, lawfully claiming the whole or any part thereof, he will forever **WARRANT AND DEFEND.**

In Witness Whereof, the said part of the first part, ha ve hereunto set their hand s and seal s the day and year first above written.

Sealed and Delivered, in presence of

L. Stephenson — Stamp 5¢ — John P Jacobs Seal

S. M. Stephenson — Margarette Jacobs Seal

STATE OF WISCONSIN, } ss.
COUNTY OF Oconto }

Be it Remembered, That on the Thirty first day of December A. D. 1863 personally came before me the above named John P. Jacobs and Margaret Jacobs his wife to me known to be the persons who executed the said Deed, and acknowledged the same to be their free act and deed, for the uses and purposes therein mentioned.

Stamp — L. Stephenson
Justice of the Peace

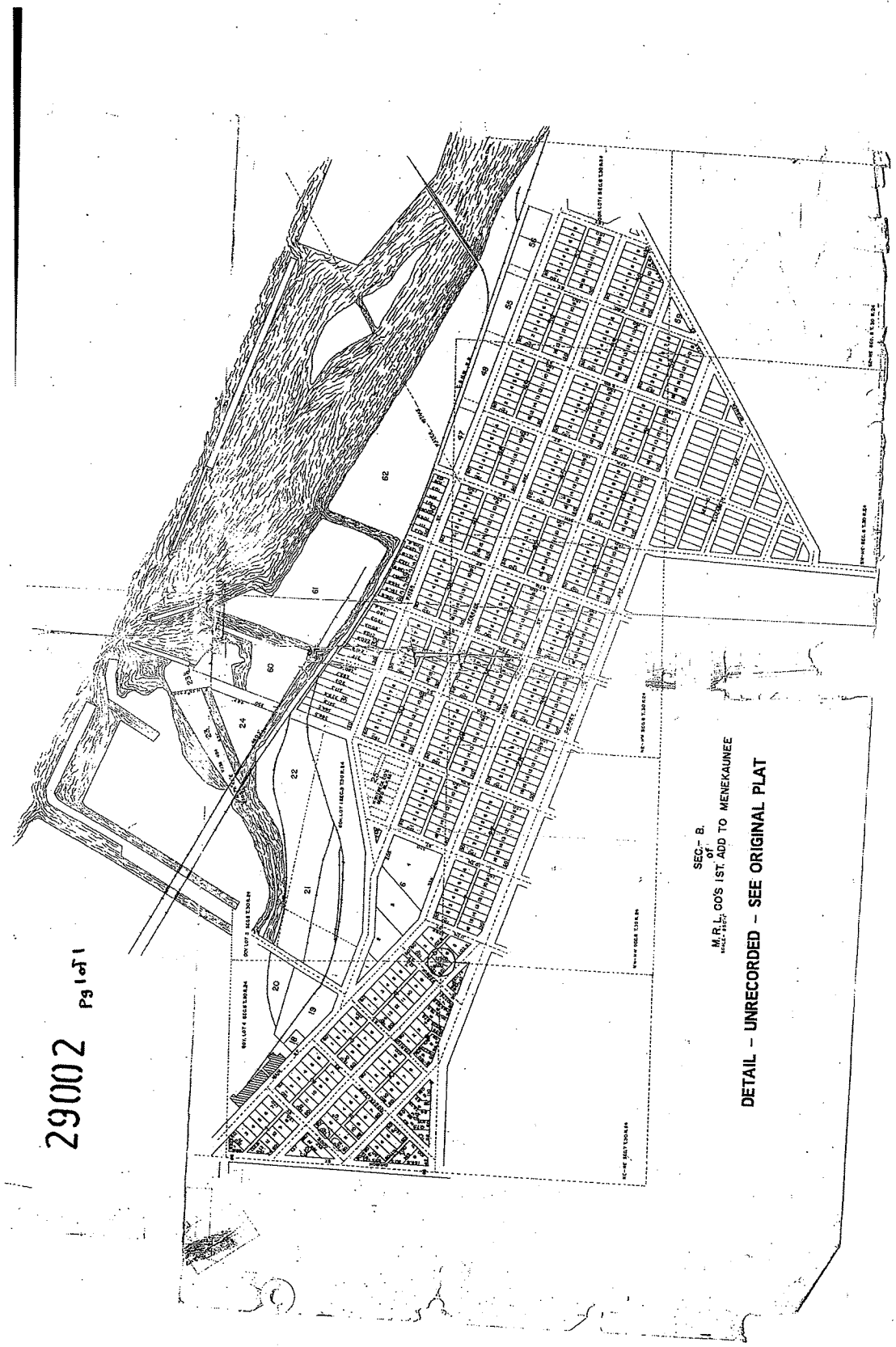
Recorded March 11th 1864
at 11 O'clock A. M.
P. G. Grumpt Reg.
By Leo Dwyer Deft.

G.1 Deed - Impacted Property

G.2 Certified Survey Map

AFFECTED
A
PROPERTY

RIGHT-OF-WAY



290002 Pg 1 of 1

AFFECTED A PROPERTY

G.3 Verification of Zoning

RIGHT-OF-WAY

Marinette County Parcel Detail

Owner data last updated: 05/01/2018

Parcel Number: 251-00948.003 **Site Address:**

Owner Information:	CANADIAN NATIONAL NKA WISCONSIN CENTRAL LTD FKA ETAL
Mailing Address:	PROPERTY TAX - 8TH FL - PO BOX 8100 DOWNTOWN STATION - MONTREAL CANADA H3C 3N4, 00000-0000

Taxing Jurisdiction:	CITY OF MARINETTE
School District:	MARINETTE
Vocational District:	NWTC
Other (if any):	

Section	Town	Range	Abbreviated Legal Description	Acres
6	30	24	RAILROAD IN S6 T30N R24E EX 4031J45 683133(HWY)	11.4

Plat/CSM
Lot: Block
Document Number:
Jacket/Volume: 5D4 Image/Page: 1OC

Assessment Year: 2017

Land	Forest Crop Land	Improvements	Total Assessed Value	Fair Market Value
20000	0	0	20000	20400

Assessment Breakdown	Acres	Land	Improvements
COMMERCIAL	5	20000	0

Tax Year: 2017

Net Tax	438.71
Special Use* (+)	0
Lottery Credit (-)	0
First Dollar Credit (-)	0
Total Tax	438.71

* Special Use may inlcude omitted tax, PFC/MFL, special assessments or special charges.

revised12/12/2012

AFFECTED A PROPERTY

RIGHT-OF-WAY

G.4 Signed Statement

WDNR BRRTS Case #: 02-38-560993

WDNR Site Name: Keller Property

Geographic Information System (GIS) Registry of Closed Remediation Sites

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

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

Responsible Party:

Kenneth C Keller Owner
(print name/title)

Kenneth C Keller 5-30-18
(signature) (date)

State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
2984 Shawano Avenue
Green Bay WI 54313-6727

Tony Evers, Governor
Preston D. Cole, Secretary
Telephone 608-266-2621
Toll Free 1-888-936-7463
TTY Access via relay - 711

July 12, 2019

AFFECTED **A** PROPERTY

RIGHT-OF-WAY

CANADIAN NATIONAL RAILWAY (CNR)
MR KEN COLLINS
1625 DEPOT ST
STEVENS POINT WI 54481

SUBJECT: Notice of Closure Approval with Continuing Obligations for Right-of-Way (ROW) Holders for CNR right-of-way North of 102 Water Street, Marinette, WI
Final Case Closure for Keller Property, 102 Water Street, Marinette, WI
DNR BRRTS Activity #: 02-38-560993

Dear Mr. Ken Collins:

The Department of Natural Resources (DNR) recently approved the completion of environmental work done at the Keller Property contamination site. This letter describes how that approval applies to the CNR right-of-way adjacent to 102 Water Street, Marinette, WI. As the right-of-way holder, you are responsible for complying with these continuing obligations for any work you conduct in the right-of-way.

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

On June 30, 2018, you received information from Ron Anderson of METCO about the Polycyclic Aromatic Hydrocarbons (PAHs), Petroleum Volatile Organic Compounds (PVOCs) and lead contamination in the railroad ROW adjacent to the Keller Property located at 102 Water Street, Marinette, WI and about the continuing obligations. Continuing obligations are meant to limit exposure to any remaining contamination.

Applicable Continuing Obligations

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

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

The DNR fact sheet "Continuing Obligations for Environmental Protection," RR-819, helps to explain a property owner's responsibility for continuing obligations on their property. The fact sheet may be obtained online at dnr.wi.gov and search "RR-819".

Closure Conditions

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

AFFECTED A PROPERTY

RIGHT-OF-WAY

July 12, 2019
Mr, Ken Collins, Canadian National Railway
Notice of Closure Approval with Continuing Obligations for (ROW) holder
Keller Property - BRRTS #: 02-38-560993

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

Department of Natural Resources
Attn: Remediation and Redevelopment Program Environmental Program Associate
2984 Shawano Avenue
Green Bay, WI 54313

Residual Soil Contamination (ch. NR 718, chs. 500 to 536, Wis. Adm. Code or ch. 289, Wis. Stats.) Soil contamination remains on CNR ROW as indicated on the attached map (Figure B.2.b; Residual Soil Contamination; April 13, 2017). 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.

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

Additional Information

Additional information about this case is available at the DNR's Bureau for Remediation and Redevelopment Tracking System (BRRTS) on the Web (BOTW) at dnr.wi.gov and search "BOTW". Enter 02-38-560993 in the **Activity Number** field in the initial screen, then click on **Search**. Scroll down and click on the **CO Packet** link for information about the completion of the environmental work. The site may also be seen on the map view, RR Sites Map. RR Sites Map can be found online at dnr.wi.gov and search "WRRD".

Please contact Tom Verstegen, the DNR project manager, at (920) 424-0025 or thomas.verstegen@wisconsin.gov with any questions or concerns.

Sincerely,

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

Attachment: Figure B.2.b; Residual Soil Contamination; April 13, 2017

ec: Ken Keller (KCK-KMK@new.rr.com)
Ron Anderson, METCO (rona@metcohq.com)

AFFECTED A PROPERTY

RIGHT-OF-WAY

CITY OF MARINETTE PROPERTY

ESTIMATED EXTENT OF PETROLEUM CONTAMINATION IN UNSATURATED SOIL EXCEEDING NR720 NON-INDUSTRIAL DIRECT CONTACT RCLS

SLOPE DOWN TO MARSH

FORMER RAILROAD TRACKS - CANADIAN NATIONAL PROPERTY

B.2.b RESIDUAL SOIL CONTAMINATION

KELLER PROPERTY

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

MARINETTE, WISCONSIN

DRAWN BY: ED DATE: 1/22/2015
MODIFIED BY: MH DATE: 4/13/2017

NOTE: INFORMATION BASED ON AVAILABLE DATA ACTUAL CONDITIONS MAY DIFFER

MARSH

VACANT WOODED LOT - MARINETTE HOUSING AUTHORITY

OLD FENCE LINE

GRAVEL

A. F

B. F SB1/ TW1

A. F

B. F SB2

CONCRETE WALL

EMR PLATFORM

G-6 G-7 MW-3 G-8 G-19 MW-4 G-4 MW-5 G-2 G-3 G-20 G-18 MW-2 MW-1 G-1 SB3/ TW2 G-17 G-9 G-26 G-16 MW-6 G-15

C D E F G H

EMR LOADING PLAT-FORM

AREA A: 190' x 40' x 1'

CONCRETE

WAREHOUSE 102 WATER STREET

OVERHANG

AREA B: 117' x 70' x 1'

ELEVATED LOADING DOCK

GRAVEL/GRASS

VACATED STREET

RESIDENTIAL

FENCE

CRUSHED ROCK

CELL TOWER

SB8

SAND

ESTIMATED EXTENT OF PETROLEUM CONTAMINATION IN UNSATURATED SOIL EXCEEDING NR720 GW RCLS

ESTIMATED EXTENT OF PETROLEUM CONTAMINATION IN UNSATURATED SOIL EXCEEDING NR720 INDUSTRIAL DIRECT CONTACT RCLS

FENCE

ELECTRIC PANEL

GRASS

CONCRETE

WATER STREET

1ST ST

RESIDENTIAL

RESIDENTIAL

- WATER LINE
- SANITARY SEWER LINE
- STORM SEWER LINE
- NATURAL GAS LINE
- BURIED ELECTRIC LINE
- OVERHEAD UTILITIES
- TELEPHONE/CABLE LINE
- PROPERTY LINE
- SEWER MANHOLE
- STORM DRAIN
- PHASE 2 ESA SOIL BORING LOCATION
- GEOPROBE BORING LOCATION
- MONITORING WELL LOCATION
- TEMPORARY WELL LOCATION

SCALE: 1 INCH = 30 FEET

0 15 30

KEY TO FORMER ASTS
A = 18,000-GAL GASOLINE (1921 SANBORN MAP)
B = 18,000-GAL KEROSENE (1921 SANBORN MAP)
C = 200,000-GAL GASOLINE (1921 AND 1952 SANBORN MAP)
D = 6,000-GAL LUBRICATING OIL (1921 AND 1935 SANBORN MAP)
E = UNKNOWN CONTENTS (1969 AERIAL PHOTO AND 1975 TAX ASSESSORS RECORDS)
F = 18,000-GAL GASOLINE TANK (1952 SANBORN MAP)
G = PUMP HOUSE (1952 SANBORN MAP)
H = UNIDENTIFIED STRUCTURE/ POSSIBLE LOADING RACK (1952 SANBORN MAP)

- LOCATION OF GRAVEL CAP