

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

Definitions

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

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

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

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

Select the Correct Form

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

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

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

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

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

Instructions

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

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

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

Form 4400-237 (R 10/21)

Page 2 of 7

Section 1. Contact and Recipient Information

Requester Information

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

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

The requester listed above: (select all that apply)

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

Consultant

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

Select if same as requester

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

Environmental Consultant (if applicable)

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

Attorney (if applicable)

Contact Last Name	First	MI	Organization/ Business Name		
Mawicke	Jeff		Mawicke & Goisman, S.C.		
Mailing Address			City	State	ZIP Code
1509 North Prospect Avenue			Milwaukee	WI	53202
Phone # (include area code)		Fax # (include area code)		Email	
(414) 224-0600					

Property Owner (if different from requester)

Contact Last Name	First	MI	Organization/ Business Name		
Morris	Sam		1101 South Prairie Avenue LLC		
Mailing Address			City	State	ZIP Code
252 East Highland Avenue			Milwaukee	WI	53202
Phone # (include area code)		Fax # (include area code)		Email	
				smorris@jjeffers.com	

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

Form 4400-237 (R 10/21)

Page 3 of 7

Section 2. Property Information

Property Name Schaefer Brush Mfg Co		FID No. (if known)	
BRRTS No. (if known) 0268563736		Parcel Identification Number WAKC1335944	
Street Address 1101 South Prairie Avenue		City Waukesha	State WI
		ZIP Code 53186	
County Waukesha	Municipality where the Property is located <input checked="" type="radio"/> City <input type="radio"/> Town <input type="radio"/> Village of	Property is composed of: <input checked="" type="radio"/> Single tax parcel <input type="radio"/> Multiple tax parcels	Property Size Acres 5

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

No Yes

Date requested by: _____

Reason: _____

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

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

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

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

Section 3. Technical Assistance or Post-Closure Modifications;

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

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

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

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

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

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

Post-Closure Modifications - NR 727, [181]

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

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

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

Form 4400-237 (R 10/21)

Page 4 of 7

Section 4. Request for Liability Clarification

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

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

❖ **Include a fee of \$700.**

Provide the following documentation:

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

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

❖ **Include a fee of \$700.**

Provide the following documentation:

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

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

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

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

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

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

Form 4400-237 (R 10/21)

Page 5 of 7

Section 4. Request for Liability Clarification (cont.)

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

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

- ❖ **Include a fee of \$700 and an adequate summary of relevant environmental work to date.**

No Action Required (NAR) - NR 716.05, [682]

- ❖ **Include a fee of \$700.**

Use where an environmental discharge has or has not occurred, and applicant wants a DNR determination that no further assessment or clean-up work is required. Usually this is requested after a Phase I and Phase II environmental assessment has been conducted; the assessment reports should be submitted with this form. This is not a closure letter.

Clarify the liability associated with a "closed" Property - s. 292.55, Wis. Stats. [682]

- ❖ **Include a fee of \$700.**

- Include a copy of any closure documents if a state agency other than DNR approved the closure.

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

Section 5. Request for a Specialized Agreement

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

Tax cancellation agreement - s. 75.105(2)(d), Wis. Stats. [654]

- ❖ **Include a fee of \$700, and the information listed below:**

- (1) Phase I and II Environmental Site Assessment Reports,
- (2) a copy of the Property deed with the correct legal description.

Agreement for assignment of tax foreclosure judgement - s.75.106, Wis. Stats. [666]

- ❖ **Include a fee of \$700, and the information listed below:**

- (1) Phase I and II Environmental Site Assessment Reports,
- (2) a copy of the Property deed with the correct legal description.

Negotiated agreement - Enforceable contract for non-emergency remediation - s. 292.11(7)(d) and (e), Wis. Stats. [630]

- ❖ **Include a fee of \$1400, and the information listed below:**

- (1) a draft schedule for remediation; and,
- (2) the name, mailing address, phone and email for each party to the agreement.

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

Form 4400-237 (R 10/21)

Page 6 of 7

Section 6. Other Information Submitted

Identify all materials that are included with this request.

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

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

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

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

- Groundwater
- Soil
- Sediment
- Other medium - Describe: _____

Date of Collection: _____

- A copy of the closure letter and submittal materials
- Draft tax cancellation agreement
- Draft agreement for assignment of tax foreclosure judgment
- Other report(s) or information - Describe: Response to June 15, 2023 Letter and Work Plan to Complete SI

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

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

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

Section 7. Certification by the Person who completed this form

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

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



Signature

9/1/23

Date Signed

Senior Engineer

Title

(414) 225-0592

Telephone Number (include area code)

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

Form 4400-237 (R 10/21)

Page 7 of 7

Section 8. DNR Contacts and Addresses for Request Submittals

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

<http://dnr.wi.gov/files/PDF/pubs/rr/RR690.pdf>

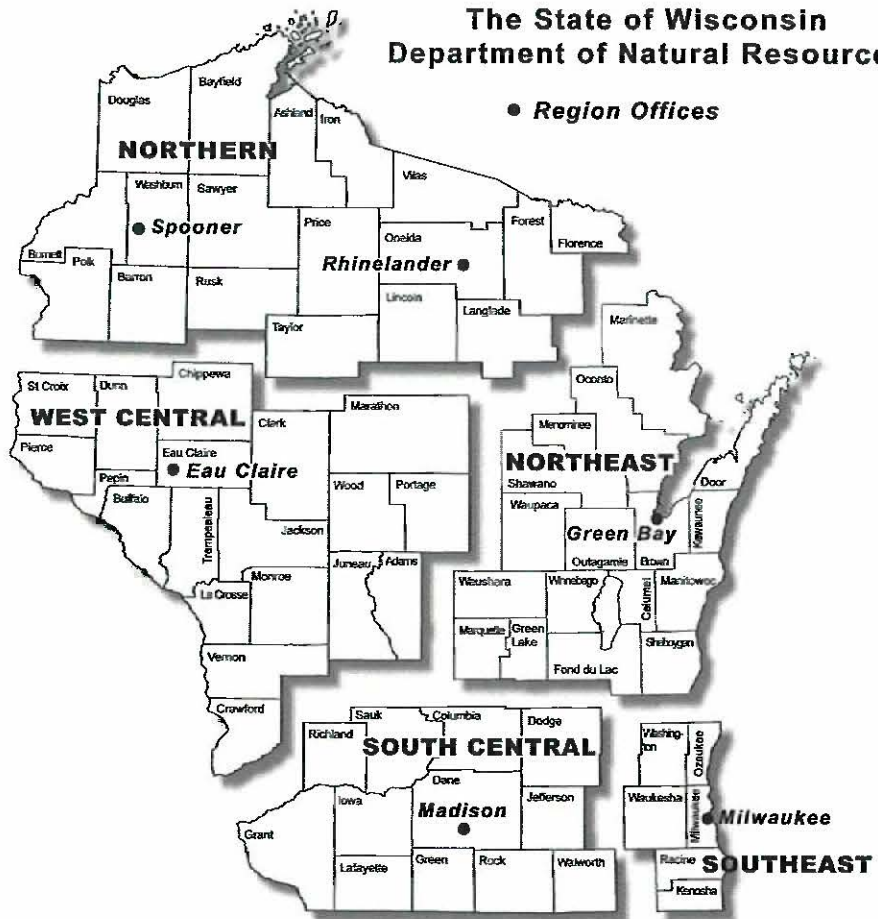
DNR NORTHERN REGION
Attn: RR Program Assistant
Department of Natural Resources
223 E Steinfest Rd Antigo, WI 54409

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

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

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

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



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

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



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

September 1, 2023

Ms. Paul Grittner
Wisconsin Department of Natural Resources
Remediation and Redevelopment Program
1027 West Saint Paul Avenue
Milwaukee, Wisconsin 53202

By Email: paul.grittner@wisconsin.gov

Subject: Response to June 15, 2023 Letter and Work Plan to Complete Site Investigation
Schaefer Brush site, 1101 South Prairie Avenue, Waukesha, Wisconsin
Project Number 1604-1204
BRRTS Number: 02-68-563736; FID: 268138750

Dear Mr. Grittner,

Thank you for your review of the *Supplemental Site Investigation Report and Remedial Action Plan (SIR/RAP)* for Schaefer Brush in Waukesha, Wisconsin (site or subject property). The *SIR/RAP* was submitted by SET Engineering LLC. (SET) and received by the Wisconsin Department of Natural Resources (WDNR) on April 4, 2023. The WDNR issued a letter dated June 15, 2023 in response to the *SIR/RAP*, included as Attachment 1.

SCOPE OF SERVICES

SET intends to complete the site investigation for the release that occurred at the subject property and obtain WDNR concurrence. To paraphrase the June 15, 2023 WDNR review of the groundwater investigation, the following was requested:

- additional groundwater samples are required to define chlorinated volatile organic compounds (CVOCs) impacts and
- determine if a discharge of PFAS-containing materials occurred on-site.

Down-gradient off-site monitoring well MW-7 is located at the Prairie Home Cemetery and does not demonstrate the down-gradient extent of dissolved-phase impacts originating at Schaefer Brush. Groundwater sampling analytical results for MW-7 indicate exceedances of the Wisconsin Administrative Code Chapter NR 140 Enforcement Standard (NR 140 ES) for tetrachloroethylene (PCE).

Groundwater monitoring wells for other release sites are located down-gradient from MW-7. To determine the extent of CVOCs in groundwater from the Schaefer Brush site, SET has evaluated publicly-available groundwater monitoring data collected at adjacent release sites.

Adjacent release sites include the following:

Site Name	BRRTS Number	FID Number
City of Waukesha West Ave LF	0268271605	268145680
Prairie Home Cemetery	0268000841	268382070
Amron Corp	0268244844	268006200

Area-Wide PCE Concentration Map from the March 2023 *SI/RAP* is attached.

City of Waukesha West Avenue Landfill (East of Schaefer Brush)

The most recent groundwater sampling results available on BRRTS on the Web for the West Avenue Landfill investigation were collected in April 2022. West Avenue Landfill wells MW-14 and MW-17 located at the east side of the Prairie Home Cemetery did not report any detections of PCE or trichloroethene (TCE). Since PCE was not detected in groundwater samples collected from MW-14 and MW-17, groundwater impacts emanating from Schaefer do not commingle with the release that occurred at the West Avenue Landfill.

Prairie Home Cemetery (North of Schaefer Brush)

The most recent groundwater sampling results presented on BRRTS on the Web for the Prairie Home Cemetery site investigation were collected on October 3, 2012 and analyzed for VOCs. The release at the Prairie Home Cemetery appears to have occurred at the north side of the property where detections of TCE ranged from <0.15 to 4.7 ug/l and no detections of PCE were reported. The lack of PCE detections suggests the groundwater impacts emanating from Schaefer do not commingle with the release at the Prairie Home Cemetery.

Amron Corp (Southeast of Schaefer Brush)

The most recent groundwater sampling results for the Amron site investigation provided on BRRTS on the Web were collected in 2018. PCE was not reported to exceed the NR 140 ES; however, TCE was reported above the NR 140 ES in samples collected from MW-16, MW-17, and MW-18. For groundwater samples collected in 2018, TCE detections in MW-16 range from 4.40 to 6.30 ug/l; MW-17 range from 3.60 to 4.90 ug/l; and MW-18 range from 8.90 to 14.6 ug/l. Since the available groundwater sampling results for MW-16, MW-17, and MW-18 do not report PCE, these wells appear to define the extent of groundwater impact from Schaefer Brush to the east.

PFAS in Groundwater

Groundwater samples collected from MW-2 reported PFAS at concentrations slightly exceeding the Wisconsin Department of Health Interim Enforcement Standard. Perfluorooctanesulfonic acid (PFOS) was detected in groundwater samples collected from MW-2 at concentrations ranging from 25 to 33 nanograms/liter (ng/l, or parts per trillion). Perfluorooctanoic acid (PFOA) was also detected in groundwater samples collected from MW-2 at concentrations ranging from 4.4 to 5.0 ng/l. Since PFAS are soluble and readily mobile in groundwater, and the Interim Enforcement Standard is 20.0 ng/l for the sum of these detections, the low-level concentrations suggest the source of the impacts are a significant distance upgradient from the Schaefer Brush site.

Proposed Groundwater Sampling

To determine the extent of PCE in groundwater emanating from the Schaefer Brush site, SET proposes collecting groundwater samples for VOCs analysis from the following wells:

- Schaefer Brush site monitoring wells MW-1 through MW-8
- Amron monitoring wells MW-16, MW-17, and MW-18
- A monitoring well found at west side of Prairie Home Cemetery, south of the office building (MW-9)

Additionally, to evaluate if a release of PFAS-containing materials occurred on-site, SET proposes collecting groundwater samples from MW-1 through MW-5.

Wells MW-4 and MW-5 are located up-gradient (south) from MW-2. If PFAS impact is reported in groundwater samples collected from up-gradient monitoring wells (MW-4 and MW-5), the source of the impacts is likely located south (up-gradient) of the site.

Vapor Intrusion Pathway

Indoor air sampling analytical results demonstrate the positive pressure system (PPS) is operating effectively to reduce the vapor impacts from entering the building. Although TCE and PCE are detected in indoor air, the detected VOCs are well below Large Commercial Indoor Air Vapor Action Levels (VALs) and meet indoor air quality standards.

Table 5 in the *SIR/RAP* presents a summary of the indoor air sampling results prior to installing the PPS. The Large Commercial VALs were exceeded for 1,4-dichlorobenzene, PCE, TCE, and naphthalene. The US Occupational Safety and Health Administration (OSHA) permissible exposure limit (PEL) for an 8-hour work day on a time weighted average and maximum exposure levels are presented below in parts per million (ppm):

Chemical	PEL (ppm)	PEL (ug/m ³)
1,4-dichlorobenzene	75	451,000
PCE	100	678,000
TCE	100	537,000
naphthalene	10	52,400

From an employee exposure perspective, the OSHA PEL is three orders of magnitude (1,000 times) greater than any reported detection in indoor air.

At release sites where vapor intrusion is a significant risk and sub-slab depressurization systems (SSDSs) are warranted, sub slab depressurization is not necessarily warranted over the entire building footprint to eliminate an exposure pathway. SSDSs are typically deployed at areas where sub-slab soil sampling and/or vapor sampling suggest a risk for vapor intrusion.

Similarly, imposing positive pressure over an entire building is not required to eliminate vapor intrusion. A PPS can be targeted at specific areas of a building footprint where vapor intrusion poses a significant risk of exposure to building occupants. Unless directed otherwise, SET intends to measure success of the PPS using standard VALs.

Assessing Remedial Action Options

SET will evaluate options for removing contaminant mass from the Schaefer Brush site. An operating manufacturing facility owned by a third-party does not present an ideal scenario for directly removing sorbed-phase hydrocarbons. Soil vapor extraction is often successful at release sites where a sandy vadose zone allows removal of vapor phase hydrocarbons. SET will review options with the property owner and responsible party to evaluate allowable access and to determine how significant contaminant mass can be removed.

General Questions

The basement sump pump is installed in a concrete vessel (crock). Piping that appears to be drain tile is occasionally submerged below standing water in the sump. The drain tile is likely a foundation drain to prevent water from seeping through the concrete walls and/or floor. The stagnant water in the sump appears to be precipitation that is intercepted by the foundation drain and condensate from the air conditioner. Attachment 3 contains photographs.

Sample IA-3 was collected at the south end of the building. According to the information available, sample IAO-3 was collected within the restroom as requested.

Other Information

Although WDNR is not requesting any additional sampling, SET requests concurrence on the planned groundwater sampling. While the outcome of the proposed sampling is unknown, SET intends to determine if WDNR is aware of other suspected source(s) at some location, contributing or exacerbating situations of concern, or a specific receptor that should be evaluated more closely.

SET intends to obtain WDNR concurrence for completion of the site investigation at the site. If any additional sampling or investigation is required for an approved site investigation, please share any requested information.

Additionally, SET requests technical justification for favoring a SSDS over the operating PPS. Whether the approach is to apply negative pressure beneath a floor slab or applying a positive pressure above a floor slab, either system will apply net-positive pressure in a building. A net positive pressure in the building will allow potential vapors to migrate to low-pressure areas.

From a continuous operation standpoint, a heating, ventilation, air conditioning system (HVAC) will be promptly repaired if the system shuts down to maintain a comfortable work area. An SSDS could be off-line for a period of time prior to observing a tripped breaker or other malfunction. The existing PPS has demonstrated acceptable levels through empirical data that supports the success of the system.

Conclusion

SET intends to define the extent of impacted media and complete the investigation of impacts released at the Schaefer Brush site. SET intends to obtain WDNR concurrence when the extent is defined.

The building owner intends to continue to eliminate exposure pathways to building occupants, including risk of inhalation of VOCs release to the subsurface that enter the building through soil vapor. The existing PPS is equally valid as an SSDS and has lesser risk of malfunction or extended

shutdown. Existing controls on the building HVAC system demonstrate positive pressure in the building over an extended period and will operate indefinitely and indoor air sampling results indicate building occupants are protected though positive pressure and fresh air exchange.

If a short-term malfunction of the HVAC occurs, indoor air sampling results collected prior to installing the PPS are one one-thousandth of the OSHA PEL and are not likely to pose a health risk to workers.

Our primary short-term goal is to obtain WDNR approval of a site instigation report. Lastly, SET will evaluate options for removing contaminant mass from the subsurface and will submit a remedial action options report for WDNR review and approval.

Thank you for your assistance. SET requests any discussion and description of any specific, technically valid concern(s) for any methods employed at the Schaefer Brush site that does not eliminate an exposure pathway to the extent practicable. Please call 414/224-8300 if you have any questions.

Sincerely,

SET ENGINEERING, LLC.



Kurt McClung, PG, PE
Senior Engineer



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

cc: Mr. Jeff Mawicke— Mawicke & Goisman, S.C. (by email jmawicke@dmgr.com)
Mr. Sam Morris— 1101 South Prairie Avenue LLC. (by email smorris@jjeffers.com)

Enclosures

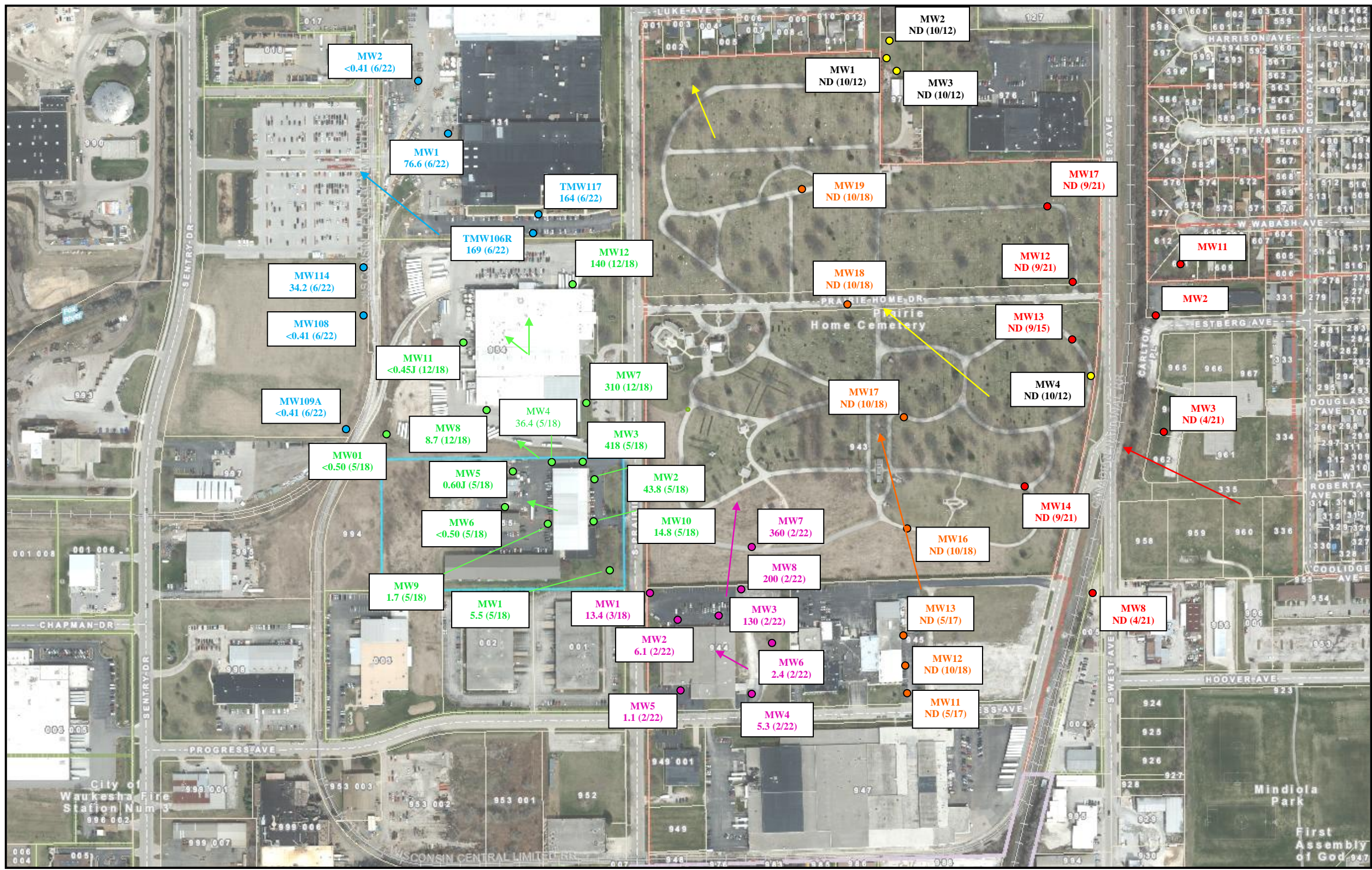
DNR Technical Review Request Form

Area-Wide PCE Concentration Map

Attachment 1—Wisconsin DNR Letter Dated June 15, 2023

Attachment 2—Adjacent Release Site Information

Attachment 3—Photographs



LEGEND

- Stippich Monitoring Well
- Former Magnetek Electric Monitoring Well
- Schaefer Brush Monitoring Well
- Prairie Home Cemetery Monitoring Well
- West Avenue Landfill Monitoring Well
- Former Amron Monitoring Well
- ↖ Groundwater Flow Direction Reported in Historical Reports

MW1
13.4 (2/22)

Well ID
Most Recent PCE Concentration
(Date)

ND – not detected
PCE – tetrachloroethene
PCE concentration are reported in micrograms per liter
Well locations are approximate

AREA-WIDE GROUNDWATER PCE CONCENTRATION MAP
SCHAEFER BRUSH
1101 SOUTH PRAIRIE AVENUE
WAUKESHA, WISCONSIN



Attachment 1



June 15, 2023

Mr. Jeff Mawicke
Mawicke & Goisman, S.C.
1509 North Prospect Avenue
Milwaukee, WI 53202
Email only to: jmawicke@dmgr.com

Mr. Sam Morris
1101 South Prairie Avenue LLC
252 East Highland Avenue
Milwaukee, WI 53202
Email only to: smorris@jjeffers.com

Subject: Review of Supplemental Site Investigation Report and Remedial Action Plan
Schaefer Brush, 1101 South Prairie Avenue, Waukesha, Wisconsin
DNR BRRTS Activity #: 02-68-563736; FID #: 268138750

Dear Mr. Mawicke and Mr. Morris:

The Department of Natural Resources (DNR) has completed its review of the March 23, 2023, *2022 Supplemental Site Investigation Report and Remedial Action Plan (SIRRAP)* and other applicable documentation submitted for the site identified above. The applicable technical assistance fee for providing review and a written response, in accordance with Wis. Admin. Code § NR 749.04 (1), was received on April 4, 2023. The SIRRAP requests DNR concurrence that the investigation and remedial actions conducted at the site are complete and a request for case closure could be submitted. As discussed below, the DNR determined that additional actions are needed to investigate the extent of groundwater contamination, interrupt or mitigate the vapor intrusion pathway, and to reduce the mass and concentration of contamination impacting indoor air.

Investigate the extent of groundwater contamination

Additional groundwater samples must be collected to define the degree and extent (both vertically and horizontally) of PFAS contamination in groundwater as required by Wis. Admin. Code § NR 716.11 (3) (a) and (5) (f). Offsite samples may need to be collected to define the extent of impacts, per Wis. Admin. Code § NR 716 (4). The investigation must determine if discharges of PFAS-containing materials occurred onsite so the extent of contamination within these source areas can be determined (Wis. Admin. Code § NR 726 (5) (e)) and, if needed, remediated.

Recently collected groundwater samples have not clarified how far down gradient chlorinated volatile organic compound (CVOC) contamination has migrated. Sample data from MW-7 also does not demonstrate that contaminant concentrations will fall below the enforcement standard within a reasonable amount of time in compliance with Wis. Admin. Code § NR 726.05 (6) (b). Continue to collect groundwater samples from this well to support an evaluation of contaminant trends and assess what other actions would be needed to demonstrate compliance with this requirement (additional sampling locations, remedial actions, long-term monitoring, etc.).

Interrupt or mitigate the vapor intrusion pathway

The operation of the positive pressure system (PPS) appears to be having some positive impact on air quality. Tetrachloroethene (PCE) and trichloroethene (TCE) have not been detected in indoor air at concentrations greater than vapor action levels since the PPS has been operating. However, these contaminants continue to be consistently detected in indoor air samples indicating that the vapor intrusion pathway has not been interrupted. Even brief increases in TCE concentrations, caused by pressure variations within the building or other factors, can pose a risk to occupants. Potential variations or spikes in TCE concentrations cannot be ruled out by the indoor air samples collected as these only represent conditions at a small portion of the facility over a relatively short amount of time. In addition, indoor air pressure readings at the BP- and BBP- locations indicate that positive pressure is not maintained in all portions of the facility throughout the entire year. While the monthly average building pressure (as measured by one sensor in the facility) is shown to be positive, this does not confirm that pressure is always maintained consistently in all areas of the facility. Additional steps must therefore be taken to fully interrupt or mitigate the vapor intrusion pathway to ensure TCE will not pose a risk. Because of concerns regarding the long-term maintenance and effectiveness of PPSs, the DNR does not recommend these measures as stand-alone long-term mitigation strategies, especially when TCE is present and acute risk is a concern.

The DNR recommends that you prepare a plan for mitigating the vapor intrusion pathway which identifies the area needing mitigation, the specific actions that will be taken to interrupt this pathway, the data and measurements that will be collected to confirm mitigation is occurring as expected, and the ongoing monitoring and/or maintenance that will be conducted to ensure continuous mitigation in compliance with Wis. Admin. Code § 724.13. Design and reports prepared for a mitigation system must be submitted to the DNR and comply with the applicable portions of Wis. Admin. Code §§ 724.09 and 724.11.

The DNR recommends that your mitigation plan includes the installation of additional sub-slab extraction points, similar to what was constructed as EX-1, in areas where impacted sub-slab vapors have been identified. You will need to demonstrate the extent to which the existing and newly installed extraction points influence sub-slab conditions by collecting sub-slab pressure readings around these locations.

Assessing Options for Conducting a Remedial Action

Per Wis. Admin. Code § NR 726.05 (8) (b) 1, case closure cannot be granted for a site with contaminant concentrations in soil vapor greater than a VRSL until a remedial action has been conducted that reduces the mass and concentration of volatile compounds to the extent practicable. A site where remediation is ongoing (such as treatment by an operating vapor extraction system) would not be eligible for closure. Sub-slab depressurization systems are not an effective means of reducing the mass or concentrations of contaminants in sub-slab vapor (see Note under Wis. Admin. Code § NR 726.05 (8) (b) 1).

The DNR requests that you evaluate potential remedial options, following the process outlined in Wis. Admin. Code § NR 722.07 and NR 722.09, to determine what could be a practicable means of reducing contamination impacting sub-slab vapors. Prepare a remedial action options reports as required by Wis. Admin. Code § NR 722.13 and submit a copy to the DNR.

General Questions

We request that responses to the following questions be provided to clarify information provided in the SIRRAP.

Is the base of the sump in the basement sealed?

Were the IA-3 samples collected from within the rest room as previously requested?

Other information

The DNR is not requesting additional soil, vapor, or air samples be collected at this time to complete the site investigation. However, additional sampling may be beneficial for planning a mitigation system or remedial actions, or for commissioning of mitigation systems. Results of sample analysis must be provided to the DNR, owners of the property where the samples were collected, and occupants of the buildings as appropriate within ten business days of receipt (Wis. Admin. Code § NR 716.14 (2)).

Documents prepared to address the above items may be submitted to the DNR with the applicable review fee to obtain a written response. Once the items outlined above are addressed you should reassess whether the requirements for case closure can be met or if additional investigation or remediation will be needed.

We appreciate your efforts to protect the environment at this site. If you have any questions regarding this request, please contact me by calling (414) 405-0764, or by email at paul.grittner@wisconsin.gov.

Sincerely,



Paul Grittner
Hydrogeologist
Remediation & Redevelopment Program

cc: Toni Schoen, SET Engineering, LLC – tschoen@setenv.com

Attachment 2



NOTES

1. LIMITS OF WASTE PROVIDED BY THE CITY OF WAUKESHA.
2. GRAVEL PITS LIMITS BASED ON TOPOGRAPHIC MAP PROVIDED BY ABRAMS AERIAL, 1955.
3. LANDFILL GAS SYSTEM AND MONITORING POINTS PROVIDED BY CITY OF WAUKESHA, (EARTHTECH, 2002).
4. ORTHO PHOTO IS FROM THE LATEST BING MAP IMAGERY.
5. HORIZONTAL COORDINATE SYSTEM BASED ON NAD1983 WISCONSIN STATE PLANE SOUTH, UNITS IN FEET.



LEGEND

- LIMITS OF WASTE PLACEMENT
- MW-9R
MW-9B MONITORING WELL NEST LOCATION
- MW-5 MONITORING WELL LOCATION

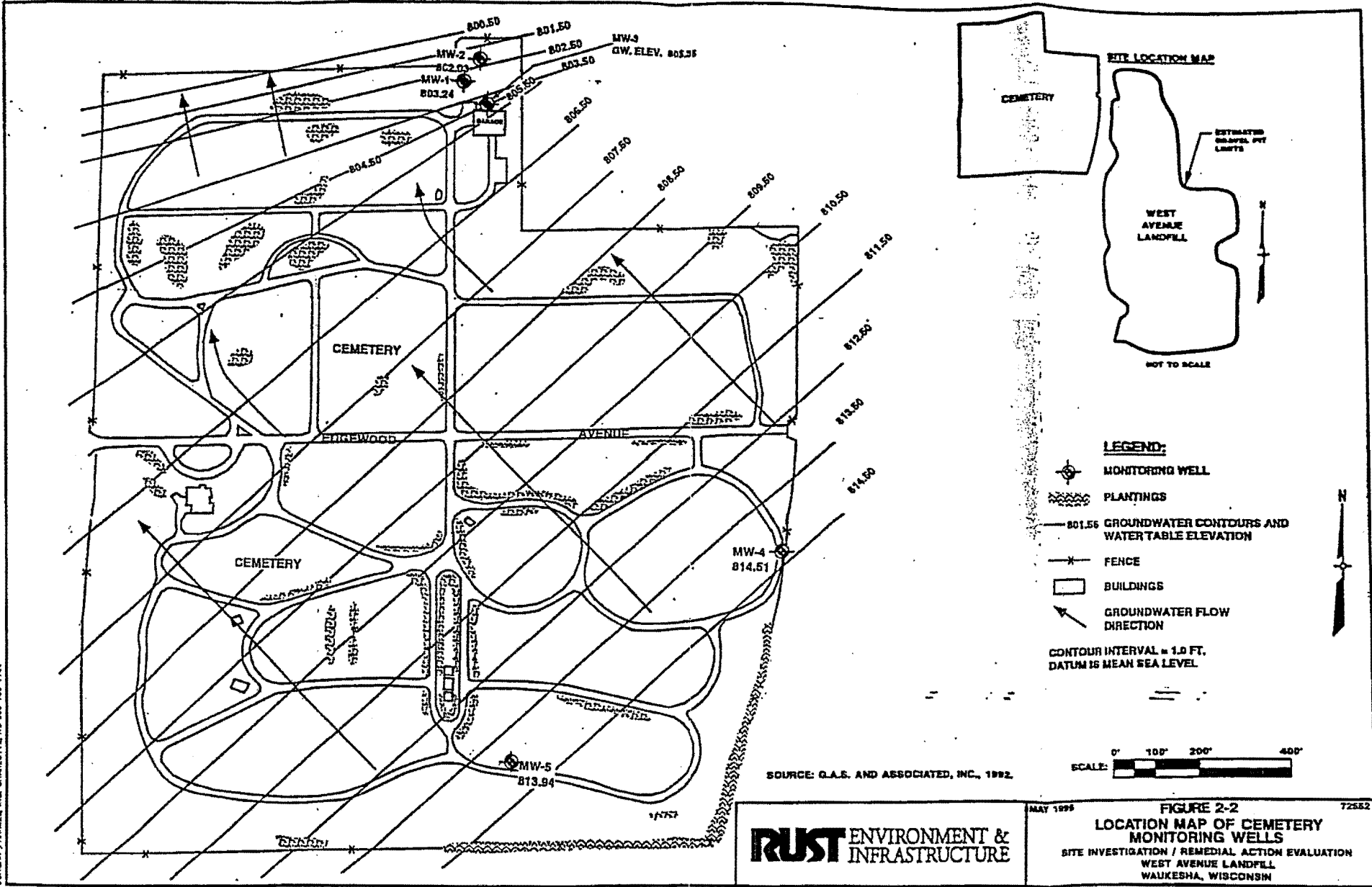


SCALE

WEST AVENUE LANDFILL

FIGURE 3
MONITORING WELL
LOCATION MAP
CITY OF WAUKESHA

Date Completed: MARCH 2023	Revision Date:
Drawn By: JOW	Checked By: DJM4
Project No: 23W013.00	



DUNCAN-PARNELL, INC. CHARLOTTE, NC 800-388-2788

RUST ENVIRONMENT & INFRASTRUCTURE

MAY 1999

FIGURE 2-2

LOCATION MAP OF CEMETERY MONITORING WELLS

SITE INVESTIGATION / REMEDIAL ACTION EVALUATION
 WEST AVENUE LANDFILL
 WAUKESHA, WISCONSIN

72552

ANALYTICAL RESULTS: Appendix III list by Method 8260 - (Sat 2000)

Page 1 of 7

Customer: Waukesha Wastewater Treatment Plant NLS Project: 186179

Project Description: Groundwater

Project Title: Template: SATAPP3 Printed: 10/16/2012 15:56

Sample: 687837 MW-1 Collected: 10/03/12 Analyzed: 10/15/12 -

ANALYTE NAME	RESULT	UNITS	DIL	LOD	LOQ	Note
Benzene	ND	ug/L	1	0.26	0.91	
Bromodichloromethane	ND	ug/L	1	0.12	0.42	
Bromoform	ND	ug/L	1	0.21	0.76	
Bromomethane	ND	ug/L	1	0.34	1.2	
Carbon Tetrachloride	ND	ug/L	1	0.19	0.67	
Chlorobenzene	ND	ug/L	1	0.21	0.74	
Chloroethane	ND	ug/L	1	2.1	7.3	
Chloroform	ND	ug/L	1	0.23	0.80	
Chloromethane	ND	ug/L	1	0.24	0.85	
Dibromochloromethane	ND	ug/L	1	0.22	0.79	
1,2-Dibromo-3-Chloropropane	ND	ug/L	1	0.37	1.3	
1,2-Dibromoethane	ND	ug/L	1	0.24	0.85	
Dibromomethane	ND	ug/L	1	0.17	0.59	
1,2-Dichlorobenzene	ND	ug/L	1	0.19	0.66	
1,3-Dichlorobenzene	ND	ug/L	1	0.18	0.64	
1,4-Dichlorobenzene	ND	ug/L	1	0.22	0.77	
Dichlorodifluoromethane	ND	ug/L	1	0.19	0.67	
1,1-Dichloroethane	ND	ug/L	1	0.19	0.66	
1,2-Dichloroethane	ND	ug/L	1	0.24	0.86	
1,1-Dichloroethene	ND	ug/L	1	0.20	0.70	
cis-1,2-Dichloroethene	ND	ug/L	1	0.21	0.73	
trans-1,2-Dichloroethene	ND	ug/L	1	0.19	0.69	
1,2-Dichloropropane	ND	ug/L	1	0.20	0.70	
cis-1,3-Dichloropropene	ND	ug/L	1	0.23	0.80	
trans-1,3-Dichloropropene	ND	ug/L	1	0.23	0.83	
Ethylbenzene	ND	ug/L	1	0.22	0.76	
Methylene chloride	ND	ug/L	1	0.40	0.73	
Naphthalene	ND	ug/L	1	0.32	1.1	
Styrene	ND	ug/L	1	0.19	0.69	
ortho-Xylene	ND	ug/L	1	0.22	0.79	
Tetrachloroethene	ND	ug/L	1	0.15	0.52	
Toluene	ND	ug/L	1	0.23	0.82	
1,1,1-Trichloroethane	ND	ug/L	1	0.21	0.73	
1,1,2-Trichloroethane	ND	ug/L	1	0.25	0.90	
Trichloroethene	4.7	ug/L	1	0.25	0.88	
Trichlorofluoromethane	ND	ug/L	1	0.25	0.88	
Vinyl chloride	ND	ug/L	1	0.15	0.53	
meta,para-Xylene	ND	ug/L	1	0.46	1.6	
MTBE	ND	ug/L	1	0.19	0.67	
Acetone	[4.2]	ug/L	1	4.2	12	
Carbon Disulfide	ND	ug/L	1	0.19	0.66	
Methyl Ethyl Ketone	ND	ug/L	1	1.0	2.9	
Tetrahydrofuran	ND	ug/L	1	0.48	1.7	
Dibromofluoromethane (SURRE)	121%					S
Toluene-d8 (SURRE)	110%					S
1-Bromo-4-Fluorobenzene (SURRE)	103%					S

NOTES APPLICABLE TO THIS ANALYSIS:

S = This compound is a surrogate used to evaluate the quality control of a method.

ANALYTICAL RESULTS: Appendix III list by Method 8260 - (Sat 2000)

Page 2 of 7

Customer: Waukesha Wastewater Treatment Plant NLS Project: 186179

Project Description: Groundwater

Project Title: Template: SATAPP3 Printed: 10/16/2012 15:56

Sample: 687838 MW-2 Collected: 10/03/12 Analyzed: 10/15/12 -

ANALYTE NAME	RESULT	UNITS	DIL	LOD	LOQ	Note
Benzene	ND	ug/L	1	0.26	0.91	
Bromodichloromethane	ND	ug/L	1	0.12	0.42	
Bromoform	ND	ug/L	1	0.21	0.76	
Bromomethane	ND	ug/L	1	0.34	1.2	
Carbon Tetrachloride	ND	ug/L	1	0.19	0.67	
Chlorobenzene	ND	ug/L	1	0.21	0.74	
Chloroethane	ND	ug/L	1	2.1	7.3	
Chloroform	ND	ug/L	1	0.23	0.80	
Chloromethane	ND	ug/L	1	0.24	0.85	
Dibromochloromethane	ND	ug/L	1	0.22	0.79	
1,2-Dibromo-3-Chloropropane	ND	ug/L	1	0.37	1.3	
1,2-Dibromoethane	ND	ug/L	1	0.24	0.85	
Dibromomethane	ND	ug/L	1	0.17	0.59	
1,2-Dichlorobenzene	ND	ug/L	1	0.19	0.66	
1,3-Dichlorobenzene	ND	ug/L	1	0.18	0.64	
1,4-Dichlorobenzene	ND	ug/L	1	0.22	0.77	
Dichlorodifluoromethane	ND	ug/L	1	0.19	0.67	
1,1-Dichloroethane	[0.23]	ug/L	1	0.19	0.66	
1,2-Dichloroethane	ND	ug/L	1	0.24	0.86	
1,1-Dichloroethene	ND	ug/L	1	0.20	0.70	
cis-1,2-Dichloroethene	[0.25]	ug/L	1	0.21	0.73	
trans-1,2-Dichloroethene	ND	ug/L	1	0.19	0.69	
1,2-Dichloropropane	ND	ug/L	1	0.20	0.70	
cis-1,3-Dichloropropene	ND	ug/L	1	0.23	0.80	
trans-1,3-Dichloropropene	ND	ug/L	1	0.23	0.83	
Ethylbenzene	ND	ug/L	1	0.22	0.76	
Methylene chloride	ND	ug/L	1	0.40	0.73	
Naphthalene	ND	ug/L	1	0.32	1.1	
Styrene	ND	ug/L	1	0.19	0.69	
ortho-Xylene	ND	ug/L	1	0.22	0.79	
Tetrachloroethene	ND	ug/L	1	0.15	0.52	
Toluene	ND	ug/L	1	0.23	0.82	
1,1,1-Trichloroethane	ND	ug/L	1	0.21	0.73	
1,1,2-Trichloroethane	ND	ug/L	1	0.25	0.90	
Trichloroethene	2.8	ug/L	1	0.25	0.88	
Trichlorofluoromethane	ND	ug/L	1	0.25	0.88	
Vinyl chloride	ND	ug/L	1	0.15	0.53	
meta,para-Xylene	ND	ug/L	1	0.46	1.6	
MTBE	ND	ug/L	1	0.19	0.67	
Acetone	ND	ug/L	1	4.2	12	
Carbon Disulfide	ND	ug/L	1	0.19	0.66	
Methyl Ethyl Ketone	ND	ug/L	1	1.0	2.9	
Tetrahydrofuran	ND	ug/L	1	0.48	1.7	
Dibromofluoromethane (SURR)	109%					S
Toluene-d8 (SURR)	105%					S
1-Bromo-4-Fluorobenzene (SURR)	104%					S

NOTES APPLICABLE TO THIS ANALYSIS:

S = This compound is a surrogate used to evaluate the quality control of a method.

ANALYTICAL RESULTS: Appendix III list by Method 8260 - (Sat 2000)

Page 3 of 7

Customer: Waukesha Wastewater Treatment Plant NLS Project: 186179

Project Description: Groundwater

Project Title: Template: SATAPP3 Printed: 10/16/2012 15:56

Sample: 687839 MW-3 Collected: 10/03/12 Analyzed: 10/15/12 -

ANALYTE NAME	RESULT	UNITS	DIL	LOD	LOQ	Note
Benzene	ND	ug/L	1	0.26	0.91	
Bromodichloromethane	ND	ug/L	1	0.12	0.42	
Bromoform	ND	ug/L	1	0.21	0.76	
Bromomethane	ND	ug/L	1	0.34	1.2	
Carbon Tetrachloride	ND	ug/L	1	0.19	0.67	
Chlorobenzene	ND	ug/L	1	0.21	0.74	
Chloroethane	ND	ug/L	1	2.1	7.3	
Chloroform	ND	ug/L	1	0.23	0.80	
Chloromethane	ND	ug/L	1	0.24	0.85	
Dibromochloromethane	ND	ug/L	1	0.22	0.79	
1,2-Dibromo-3-Chloropropane	ND	ug/L	1	0.37	1.3	
1,2-Dibromoethane	ND	ug/L	1	0.24	0.85	
Dibromomethane	ND	ug/L	1	0.17	0.59	
1,2-Dichlorobenzene	ND	ug/L	1	0.19	0.66	
1,3-Dichlorobenzene	ND	ug/L	1	0.18	0.64	
1,4-Dichlorobenzene	ND	ug/L	1	0.22	0.77	
Dichlorodifluoromethane	ND	ug/L	1	0.19	0.67	
1,1-Dichloroethane	ND	ug/L	1	0.19	0.66	
1,2-Dichloroethane	ND	ug/L	1	0.24	0.86	
1,1-Dichloroethene	ND	ug/L	1	0.20	0.70	
cis-1,2-Dichloroethene	ND	ug/L	1	0.21	0.73	
trans-1,2-Dichloroethene	ND	ug/L	1	0.19	0.69	
1,2-Dichloropropane	ND	ug/L	1	0.20	0.70	
cis-1,3-Dichloropropene	ND	ug/L	1	0.23	0.80	
trans-1,3-Dichloropropene	ND	ug/L	1	0.23	0.83	
Ethylbenzene	ND	ug/L	1	0.22	0.76	
Methylene chloride	ND	ug/L	1	0.40	0.73	
Naphthalene	ND	ug/L	1	0.32	1.1	
Styrene	ND	ug/L	1	0.19	0.69	
ortho-Xylene	ND	ug/L	1	0.22	0.79	
Tetrachloroethene	ND	ug/L	1	0.15	0.52	
Toluene	ND	ug/L	1	0.23	0.82	
1,1,1-Trichloroethane	ND	ug/L	1	0.21	0.73	
1,1,2-Trichloroethane	ND	ug/L	1	0.25	0.90	
Trichloroethene	2.3	ug/L	1	0.25	0.88	
Trichlorofluoromethane	ND	ug/L	1	0.25	0.88	
Vinyl chloride	ND	ug/L	1	0.15	0.53	
meta,para-Xylene	ND	ug/L	1	0.46	1.6	
MTBE	ND	ug/L	1	0.19	0.67	
Acetone	ND	ug/L	1	4.2	12	
Carbon Disulfide	ND	ug/L	1	0.19	0.66	
Methyl Ethyl Ketone	ND	ug/L	1	1.0	2.9	
Tetrahydrofuran	ND	ug/L	1	0.48	1.7	
Dibromofluoromethane (SURR)	100%					S
Toluene-d8 (SURR)	103%					S
1-Bromo-4-Fluorobenzene (SURR)	98%					S

NOTES APPLICABLE TO THIS ANALYSIS:

S = This compound is a surrogate used to evaluate the quality control of a method.

ANALYTICAL RESULTS: Appendix III list by Method 8260 - (Sat 2000)

Page 4 of 7

Customer: Waukesha Wastewater Treatment Plant NLS Project: 186179

Project Description: Groundwater

Project Title: Template: SATAPP3 Printed: 10/16/2012 15:56

Sample: 687840 MW-4 Collected: 10/03/12 Analyzed: 10/15/12 -

ANALYTE NAME	RESULT	UNITS	DIL	LOD	LOQ	Note
Benzene	ND	ug/L	1	0.26	0.91	
Bromodichloromethane	ND	ug/L	1	0.12	0.42	
Bromoform	ND	ug/L	1	0.21	0.76	
Bromomethane	ND	ug/L	1	0.34	1.2	
Carbon Tetrachloride	ND	ug/L	1	0.19	0.67	
Chlorobenzene	6.0	ug/L	1	0.21	0.74	
Chloroethane	ND	ug/L	1	2.1	7.3	
Chloroform	ND	ug/L	1	0.23	0.80	
Chloromethane	ND	ug/L	1	0.24	0.85	
Dibromochloromethane	ND	ug/L	1	0.22	0.79	
1,2-Dibromo-3-Chloropropane	ND	ug/L	1	0.37	1.3	
1,2-Dibromoethane	ND	ug/L	1	0.24	0.85	
Dibromomethane	ND	ug/L	1	0.17	0.59	
1,2-Dichlorobenzene	[0.55]	ug/L	1	0.19	0.66	
1,3-Dichlorobenzene	ND	ug/L	1	0.18	0.64	
1,4-Dichlorobenzene	1.2	ug/L	1	0.22	0.77	
Dichlorodifluoromethane	ND	ug/L	1	0.19	0.67	
1,1-Dichloroethane	ND	ug/L	1	0.19	0.66	
1,2-Dichloroethane	ND	ug/L	1	0.24	0.86	
1,1-Dichloroethene	ND	ug/L	1	0.20	0.70	
cis-1,2-Dichloroethene	ND	ug/L	1	0.21	0.73	
trans-1,2-Dichloroethene	ND	ug/L	1	0.19	0.69	
1,2-Dichloropropane	ND	ug/L	1	0.20	0.70	
cis-1,3-Dichloropropene	ND	ug/L	1	0.23	0.80	
trans-1,3-Dichloropropene	ND	ug/L	1	0.23	0.83	
Ethylbenzene	ND	ug/L	1	0.22	0.76	
Methylene chloride	ND	ug/L	1	0.40	0.73	
Naphthalene	ND	ug/L	1	0.32	1.1	
Styrene	ND	ug/L	1	0.19	0.69	
ortho-Xylene	ND	ug/L	1	0.22	0.79	
Tetrachloroethene	ND	ug/L	1	0.15	0.52	
Toluene	ND	ug/L	1	0.23	0.82	
1,1,1-Trichloroethane	ND	ug/L	1	0.21	0.73	
1,1,2-Trichloroethane	ND	ug/L	1	0.25	0.90	
Trichloroethene	ND	ug/L	1	0.25	0.88	
Trichlorofluoromethane	ND	ug/L	1	0.25	0.88	
Vinyl chloride	ND	ug/L	1	0.15	0.53	
meta,para-Xylene	ND	ug/L	1	0.46	1.6	
MTBE	ND	ug/L	1	0.19	0.67	
Acetone	ND	ug/L	1	4.2	12	
Carbon Disulfide	ND	ug/L	1	0.19	0.66	
Methyl Ethyl Ketone	ND	ug/L	1	1.0	2.9	
Tetrahydrofuran	ND	ug/L	1	0.48	1.7	
Dibromofluoromethane (SURR)	129%					S
Toluene-d8 (SURR)	98%					S
1-Bromo-4-Fluorobenzene (SURR)	104%					S

NOTES APPLICABLE TO THIS ANALYSIS:

S = This compound is a surrogate used to evaluate the quality control of a method.

ANALYTICAL RESULTS: Appendix III list by Method 8260 - (Sat 2000)

Page 5 of 7

Customer: Waukesha Wastewater Treatment Plant NLS Project: 186179

Project Description: Groundwater

Project Title: Template: SATAPP3 Printed: 10/16/2012 15:56

Sample: 687841 Duplicate (from MW-2) Collected: 10/03/12 Analyzed: 10/15/12 -

ANALYTE NAME	RESULT	UNITS	DIL	LOD	LOQ	Note
Benzene	ND	ug/L	1	0.26	0.91	
Bromodichloromethane	ND	ug/L	1	0.12	0.42	
Bromoform	ND	ug/L	1	0.21	0.76	
Bromomethane	ND	ug/L	1	0.34	1.2	
Carbon Tetrachloride	ND	ug/L	1	0.19	0.67	
Chlorobenzene	ND	ug/L	1	0.21	0.74	
Chloroethane	ND	ug/L	1	2.1	7.3	
Chloroform	ND	ug/L	1	0.23	0.80	
Chloromethane	ND	ug/L	1	0.24	0.85	
Dibromochloromethane	ND	ug/L	1	0.22	0.79	
1,2-Dibromo-3-Chloropropane	ND	ug/L	1	0.37	1.3	
1,2-Dibromoethane	ND	ug/L	1	0.24	0.85	
Dibromomethane	ND	ug/L	1	0.17	0.59	
1,2-Dichlorobenzene	ND	ug/L	1	0.19	0.66	
1,3-Dichlorobenzene	ND	ug/L	1	0.18	0.64	
1,4-Dichlorobenzene	ND	ug/L	1	0.22	0.77	
Dichlorodifluoromethane	ND	ug/L	1	0.19	0.67	
1,1-Dichloroethane	[0.21]	ug/L	1	0.19	0.66	
1,2-Dichloroethane	ND	ug/L	1	0.24	0.86	
1,1-Dichloroethene	ND	ug/L	1	0.20	0.70	
cis-1,2-Dichloroethene	[0.23]	ug/L	1	0.21	0.73	
trans-1,2-Dichloroethene	ND	ug/L	1	0.19	0.69	
1,2-Dichloropropane	ND	ug/L	1	0.20	0.70	
cis-1,3-Dichloropropene	ND	ug/L	1	0.23	0.80	
trans-1,3-Dichloropropene	ND	ug/L	1	0.23	0.83	
Ethylbenzene	ND	ug/L	1	0.22	0.76	
Methylene chloride	ND	ug/L	1	0.40	0.73	
Naphthalene	ND	ug/L	1	0.32	1.1	
Styrene	ND	ug/L	1	0.19	0.69	
ortho-Xylene	ND	ug/L	1	0.22	0.79	
Tetrachloroethene	ND	ug/L	1	0.15	0.52	
Toluene	ND	ug/L	1	0.23	0.82	
1,1,1-Trichloroethane	ND	ug/L	1	0.21	0.73	
1,1,2-Trichloroethane	ND	ug/L	1	0.25	0.90	
Trichloroethene	2.6	ug/L	1	0.25	0.88	
Trichlorofluoromethane	ND	ug/L	1	0.25	0.88	
Vinyl chloride	ND	ug/L	1	0.15	0.53	
meta,para-Xylene	ND	ug/L	1	0.46	1.6	
MTBE	ND	ug/L	1	0.19	0.67	
Acetone	ND	ug/L	1	4.2	12	
Carbon Disulfide	ND	ug/L	1	0.19	0.66	
Methyl Ethyl Ketone	ND	ug/L	1	1.0	2.9	
Tetrahydrofuran	ND	ug/L	1	0.48	1.7	
Dibromofluoromethane (SURR)	118%					S
Toluene-d8 (SURR)	90%					S
1-Bromo-4-Fluorobenzene (SURR)	102%					S

NOTES APPLICABLE TO THIS ANALYSIS:

S = This compound is a surrogate used to evaluate the quality control of a method.

ANALYTICAL RESULTS: Appendix III list by Method 8260 - (Sat 2000)

Customer: Waukesha Wastewater Treatment Plant NLS Project: 186179

Project Description: Groundwater

Project Title: Template: SATAPP3 Printed: 10/16/2012 15:56

Sample: 687842 Field Blank Collected: 10/03/12 Analyzed: 10/15/12

ANALYTE NAME	RESULT	UNITS	DIL	LOD	LOQ	Note
Benzene	ND	ug/L	1	0.26	0.91	
Bromodichloromethane	ND	ug/L	1	0.12	0.42	
Bromoform	ND	ug/L	1	0.21	0.76	
Bromomethane	ND	ug/L	1	0.34	1.2	
Carbon Tetrachloride	ND	ug/L	1	0.19	0.67	
Chlorobenzene	ND	ug/L	1	0.21	0.74	
Chloroethane	ND	ug/L	1	2.1	7.3	
Chloroform	ND	ug/L	1	0.23	0.80	
Chloromethane	ND	ug/L	1	0.24	0.85	
Dibromochloromethane	ND	ug/L	1	0.22	0.79	
1,2-Dibromo-3-Chloropropane	ND	ug/L	1	0.37	1.3	
1,2-Dibromoethane	ND	ug/L	1	0.24	0.85	
Dibromomethane	ND	ug/L	1	0.17	0.59	
1,2-Dichlorobenzene	ND	ug/L	1	0.19	0.66	
1,3-Dichlorobenzene	ND	ug/L	1	0.18	0.64	
1,4-Dichlorobenzene	ND	ug/L	1	0.22	0.77	
Dichlorodifluoromethane	ND	ug/L	1	0.19	0.67	
1,1-Dichloroethane	ND	ug/L	1	0.19	0.66	
1,2-Dichloroethane	ND	ug/L	1	0.24	0.86	
1,1-Dichloroethene	ND	ug/L	1	0.20	0.70	
cis-1,2-Dichloroethene	ND	ug/L	1	0.21	0.73	
trans-1,2-Dichloroethene	ND	ug/L	1	0.19	0.69	
1,2-Dichloropropane	ND	ug/L	1	0.20	0.70	
cis-1,3-Dichloropropene	ND	ug/L	1	0.23	0.80	
trans-1,3-Dichloropropene	ND	ug/L	1	0.23	0.83	
Ethylbenzene	ND	ug/L	1	0.22	0.76	
Methylene chloride	ND	ug/L	1	0.40	0.73	
Naphthalene	ND	ug/L	1	0.32	1.1	
Styrene	ND	ug/L	1	0.19	0.69	
ortho-Xylene	ND	ug/L	1	0.22	0.79	
Tetrachloroethene	ND	ug/L	1	0.15	0.52	
Toluene	ND	ug/L	1	0.23	0.82	
1,1,1-Trichloroethane	ND	ug/L	1	0.21	0.73	
1,1,2-Trichloroethane	ND	ug/L	1	0.25	0.90	
Trichloroethene	ND	ug/L	1	0.25	0.88	
Trichlorofluoromethane	ND	ug/L	1	0.25	0.88	
Vinyl chloride	ND	ug/L	1	0.15	0.53	
meta,para-Xylene	ND	ug/L	1	0.46	1.6	
MTBE	ND	ug/L	1	0.19	0.67	
Acetone	[6.8]	ug/L	1	4.2	12	
Carbon Disulfide	ND	ug/L	1	0.19	0.66	
Methyl Ethyl Ketone	[2.6]	ug/L	1	1.0	2.9	
Tetrahydrofuran	ND	ug/L	1	0.48	1.7	
Dibromofluoromethane (SURR)	115%					S
Toluene-d8 (SURR)	119%					S
1-Bromo-4-Fluorobenzene (SURR)	121%					S

NOTES APPLICABLE TO THIS ANALYSIS:

S = This compound is a surrogate used to evaluate the quality control of a method.

Customer: Waukesha Wastewater Treatment Plant NLS Project: 186179

Project Description: Groundwater

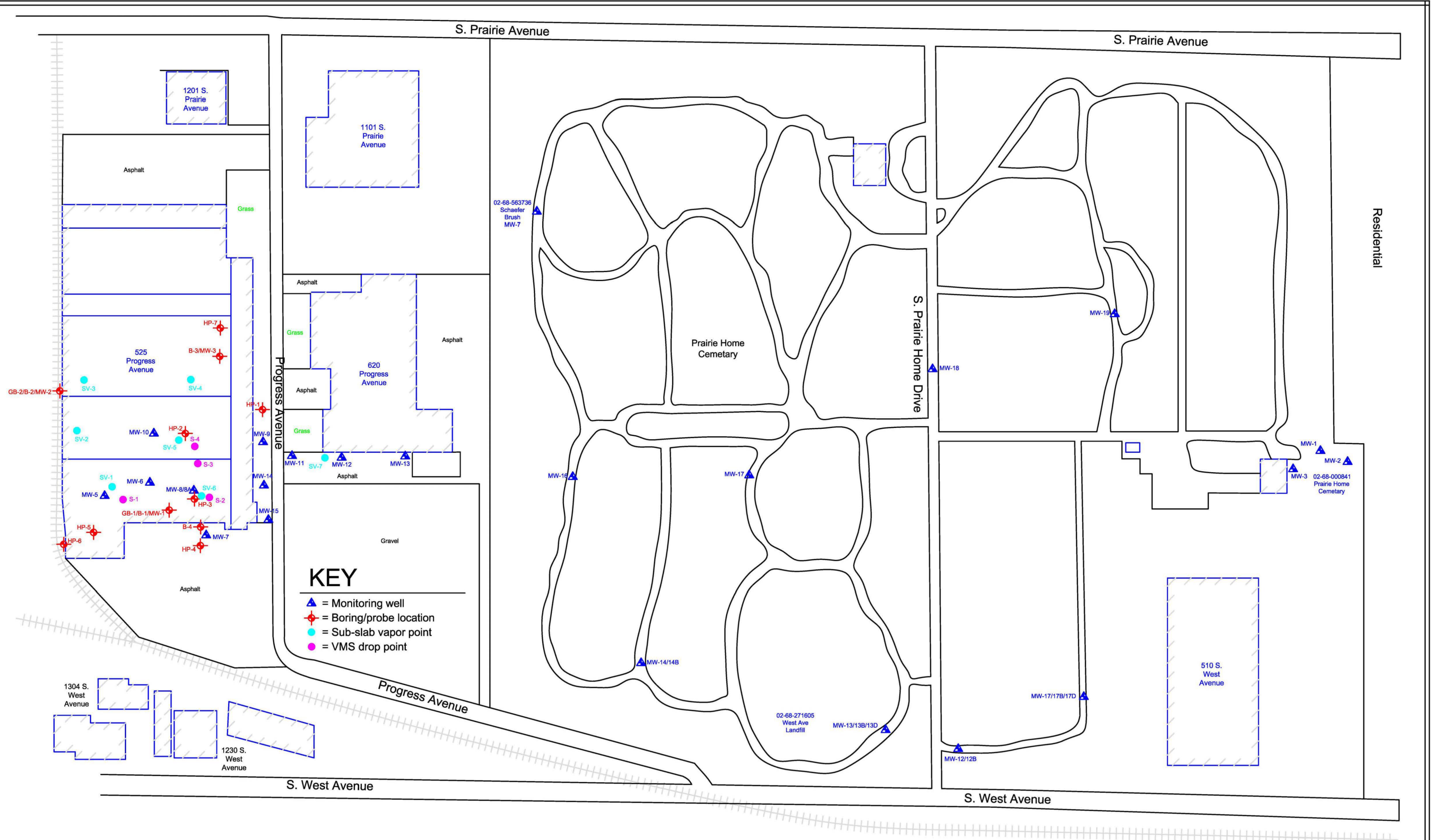
Project Title: Template: SATAPP3 Printed: 10/16/2012 15:56

Sample: 687843 Trip Blank Collected: 10/03/12 Analyzed: 10/15/12 -

ANALYTE NAME	RESULT	UNITS	DIL	LOD	LOQ	Note
Benzene	ND	ug/L	1	0.26	0.91	
Bromodichloromethane	ND	ug/L	1	0.12	0.42	
Bromoform	ND	ug/L	1	0.21	0.76	
Bromomethane	ND	ug/L	1	0.34	1.2	
Carbon Tetrachloride	ND	ug/L	1	0.19	0.67	
Chlorobenzene	ND	ug/L	1	0.21	0.74	
Chloroethane	ND	ug/L	1	2.1	7.3	
Chloroform	ND	ug/L	1	0.23	0.80	
Chloromethane	ND	ug/L	1	0.24	0.85	
Dibromochloromethane	ND	ug/L	1	0.22	0.79	
1,2-Dibromo-3-Chloropropane	ND	ug/L	1	0.37	1.3	
1,2-Dibromoethane	ND	ug/L	1	0.24	0.85	
Dibromomethane	ND	ug/L	1	0.17	0.59	
1,2-Dichlorobenzene	ND	ug/L	1	0.19	0.66	
1,3-Dichlorobenzene	ND	ug/L	1	0.18	0.64	
1,4-Dichlorobenzene	ND	ug/L	1	0.22	0.77	
Dichlorodifluoromethane	ND	ug/L	1	0.19	0.67	
1,1-Dichloroethane	ND	ug/L	1	0.19	0.66	
1,2-Dichloroethane	ND	ug/L	1	0.24	0.86	
1,1-Dichloroethene	ND	ug/L	1	0.20	0.70	
cis-1,2-Dichloroethene	ND	ug/L	1	0.21	0.73	
trans-1,2-Dichloroethene	ND	ug/L	1	0.19	0.69	
1,2-Dichloropropane	ND	ug/L	1	0.20	0.70	
cis-1,3-Dichloropropene	ND	ug/L	1	0.23	0.80	
trans-1,3-Dichloropropene	ND	ug/L	1	0.23	0.83	
Ethylbenzene	ND	ug/L	1	0.22	0.76	
Methylene chloride	ND	ug/L	1	0.40	0.73	
Naphthalene	ND	ug/L	1	0.32	1.1	
Styrene	ND	ug/L	1	0.19	0.69	
ortho-Xylene	ND	ug/L	1	0.22	0.79	
Tetrachloroethene	ND	ug/L	1	0.15	0.52	
Toluene	ND	ug/L	1	0.23	0.82	
1,1,1-Trichloroethane	ND	ug/L	1	0.21	0.73	
1,1,2-Trichloroethane	ND	ug/L	1	0.25	0.90	
Trichloroethene	ND	ug/L	1	0.25	0.88	
Trichlorofluoromethane	ND	ug/L	1	0.25	0.88	
Vinyl chloride	ND	ug/L	1	0.15	0.53	
meta,para-Xylene	ND	ug/L	1	0.46	1.6	
MTBE	ND	ug/L	1	0.19	0.67	
Acetone	ND	ug/L	1	4.2	12	
Carbon Disulfide	ND	ug/L	1	0.19	0.66	
Methyl Ethyl Ketone	ND	ug/L	1	1.0	2.9	
Tetrahydrofuran	ND	ug/L	1	0.48	1.7	
Dibromofluoromethane (SURR)	115%					S
Toluene-d8 (SURR)	106%					S
1-Bromo-4-Fluorobenzene (SURR)	100%					S

NOTES APPLICABLE TO THIS ANALYSIS:

S = This compound is a surrogate used to evaluate the quality control of a method.



A.1. Groundwater Analytical Table (Page 1 of 6)
Former Amron Property - 525 Progress Drive
Waukesha, WI

Well ID	Sampling Date	Chloro-ethane (ppb)	Chloro-methane (ppb)	cis-1,2-Dichloro-ethene (ppb)	TCE (ppb)
MW-1	1/14/2000	<1.20	<1.20	<1.20	85.0
MW-2	1/14/2000	<0.25	<0.25	<0.25	<0.25
MW-3	1/14/2000	<0.25	<0.25	<0.25	<0.25
MW-5	2/7/2000	<0.25	<0.25	<0.25	<i>1.00</i>
	9/30/2003	<5.00	<0.36	<5.00	<i>4.78</i>
	5/27/2004	<5.00	<0.36	<5.00	<i>2.68</i>
	8/20/2004	<5.00	<0.36	<5.00	<i>3.04</i>
	11/18/2004	<5.00	<0.36	<5.00	<i>1.84</i>
	4/26/2005	<5.00	<0.24	<5.00	<i>1.64</i>
	7/19/2005	<1.00	17.0	<0.50	12.0
	11/23/2005	<1.00	<0.20	<0.50	<i>3.40</i>
	3/16/2006	<1.00	<0.20	<0.50	<i>2.70</i>
	4/9/2007	<1.00	<0.20	<0.50	<i>2.30</i>
	1/22/2008	<1.00	<0.20	<0.50	<i>3.60</i>
	5/19/2009	<1.00	<0.30	<0.50	<i>0.34 J</i>
	1/17/2014	<0.44	<0.39	<0.42	<0.36
	4/18/2014	<0.37	<0.50	<0.26	<0.33
7/18/2014	<0.37	<0.50	<0.26	<0.33	
10/17/2014	<0.37	<0.50	<0.26	<0.33	
MW-6	2/7/2000	<0.25	<0.25	<0.25	15.0
	9/30/2003	<5.00	<0.36	<5.00	34.3
	5/27/2004	<5.00	<0.36	<5.00	107
	8/20/2004	<5.00	<0.36	<5.00	28.5
	11/18/2004	<5.00	<0.36	<5.00	28.3
	4/26/2005	<5.00	5.89	<5.00	31.3
	7/19/2005	<1.00	5.90	<0.50	40.0
	11/23/2005	<1.00	<0.20	<0.50	39.0
	3/16/2006	<1.00	<0.20	<0.50	58.0
	4/9/2007	<1.00	<0.20	<0.50	140
	1/22/2008	<1.00	<0.20	<0.50	56.0
	5/19/2009	<1.00	<0.30	<0.50	24.0
	1/17/2014	<0.44	<0.39	<0.42	8.10
	4/18/2014	<0.37	<0.50	<0.26	10.9
	7/18/2014	<0.37	<0.50	<0.26	47.7
	10/17/2014	<0.37	<0.50	<0.26	17.8
	7/15/2015	<0.65	<1.90	<0.45	21.5
	10/23/2015	<0.65	<1.90	<0.45	20.2
3/21/2016	<0.65	<1.90	<0.45	198	
8/3/2016	<0.65	<1.90	<0.45	81.0	
5/18/2017	<0.50	<1.30	<0.41	34.0	
7/20/2018	<0.61	<0.54	<0.37	<i>4.50</i>	
10/9/2018	<0.61	<0.54	<0.37	<i>0.53 J</i>	
ES (ppb)	-	400	3	70	5
PAL (ppb)	-	8	0.3	7	0.5

Notes:

- 1.) Concentrations in **red bold** exceed their respective enforcement standard (ES)
- 2.) Concentrations in *blue italics* exceed their respective preventive action limit (PAL)

A.1. Groundwater Analytical Table (Page 2 of 6)
Former Amron Property - 525 Progress Drive
Waukesha, WI

Well ID	Sampling Date	Chloro-ethane (ppb)	Chloro-methane (ppb)	cis-1,2-Dichloro-ethene (ppb)	TCE (ppb)
MW-7	2/7/2000	<0.25	<0.25	<0.25	<i>0.39</i>
	9/30/2003	<5.00	<0.36	<5.00	<i>4.00</i>
	5/27/2004	<5.00	<0.36	<5.00	27.1
	8/20/2004	<5.00	<0.36	<5.00	24.8
	11/18/2004	<5.00	<0.36	<5.00	22.7
	4/26/2005	<5.00	5.09	<5.00	16.8
	7/19/2005	<1.00	6.60	<0.50	13.0
	11/23/2005	<1.00	<0.20	<0.50	10.0
	3/16/2006	<1.00	<0.20	<0.50	18.0
	4/9/2007	<1.00	<0.20	<0.50	12.0
	1/22/2008	<1.00	<0.20	<0.50	<i>1.40</i>
	5/19/2009	<1.00	<0.30	<0.50	<i>0.93</i>
	1/17/2014	<0.44	<0.39	<0.42	<0.36
	4/18/2014	<0.37	<0.50	<0.26	<i>0.80 J</i>
	7/18/2014	<0.37	<0.50	<0.26	<i>0.71 J</i>
10/17/2014	<0.37	<0.50	<0.26	<i>0.35 J</i>	
7/15/2015	<0.65	<1.90	<0.45	<i>1.30 J</i>	
MW-8	2/7/2000	<1.00	<1.00	<1.00	120
	9/30/2003	<5.00	<0.36	<5.00	212
	5/27/2004	<5.00	<0.36	<5.00	358
	8/20/2004	<5.00	<0.36	<5.00	147
	11/18/2004	<5.00	<0.36	5.47	129
	4/26/2005	<5.00	9.50	<5.00	122
	7/19/2005	<1.00	15.0	0.61	100
	11/23/2005	<2.00	<0.40	<1.00	150
	3/16/2006	<4.00	<0.80	<2.00	260
	4/9/2007	<2.00	<0.40	4.40	99.0
	1/22/2008	<1.00	<0.20	4.10	84.0
	5/19/2009	<1.00	<0.30	0.94 J	42.0
	1/17/2014	<0.44	<0.39	3.40	24.0
	4/18/2014	<0.37	<0.50	0.43 J	19.3
	7/18/2014	<0.37	<0.50	<0.26	49.2
	10/17/2014	<0.37	<0.50	0.36 J	32.4
7/15/2015	0.99 J	<1.90	<0.45	20.5	
10/23/2015	<0.65	<1.90	<0.45	28.2	
3/21/2016	<0.65	<1.90	<0.45	72.0	
8/3/2016	<0.65	<1.90	<0.45	64.0	
5/18/2017	<0.50	<1.30	<0.41	39.0	
ES (ppb)	-	400	3	70	5
PAL (ppb)	-	8	0.3	7	0.5

Notes:

- 1.) Concentrations in **red bold** exceed their respective enforcement standard (ES)
- 2.) Concentrations in *blue italics* exceed their respective preventive action limit (PAL)

A.1. Groundwater Analytical Table (Page 3 of 6)
Former Amron Property - 525 Progress Drive
Waukesha, WI

Well ID	Sampling Date	Chloro-ethane (ppb)	Chloro-methane (ppb)	cis-1,2-Dichloro-ethene (ppb)	TCE (ppb)
MW-8A	5/27/2004	<5.00	<0.36	<5.00	7.90
	8/20/2004	<5.00	<0.36	<5.00	<0.50
	11/18/2004	<5.00	<0.36	<5.00	<0.23
	4/26/2005	<5.00	9.67	<5.00	<0.50
	7/19/2005	1.70	22.0	<0.50	6.20
	11/23/2005	1.40	<0.20	<0.50	0.37
	3/16/2006	<1.00	<0.20	<0.50	3.60
	4/9/2007	<1.00	<0.20	<0.50	0.53
	1/22/2008	1.10 J	<0.20	<0.50	3.70
	5/19/2009	1.10 J	<0.30	<0.50	<0.20
	1/17/2014	0.79 J	0.42 J	<0.42	<0.36
	4/18/2014	<0.37	<0.50	<0.26	<0.33
	7/18/2014	<0.37	<0.50	<0.26	<0.33
	10/17/2014	<0.37	<0.50	<0.26	<0.33
MW-9	2/7/2000	<0.25	<0.25	<0.25	30.0
	9/30/2003	<5.00	<0.36	<5.00	2.32
	5/27/2004	<5.00	<0.36	<5.00	2.31
	8/20/2004	<5.00	<0.36	<5.00	6.07
	11/18/2004	<5.00	<0.36	<5.00	31.4
	4/26/2005	<5.00	9.44	<5.00	10.3
	7/19/2005	4.00	5.10	<0.50	16.0
	11/23/2005	<1.00	<0.20	<0.50	5.30
	3/16/2006	<1.00	<0.20	<0.50	4.40
	4/9/2007	<1.00	<0.20	<0.50	57.0
	1/22/2008	<1.00	<0.20	<0.50	35.0
	5/19/2009	<1.00	<0.30	<0.50	9.70
	1/17/2014	<0.44	<0.39	<0.42	23.2
	4/18/2014	<0.37	<0.50	<0.26	13.2
	7/18/2014	<0.37	<0.50	<0.26	15.1
	10/17/2014	<0.37	<0.50	<0.26	9.70
	7/15/2015	<0.65	<1.90	<0.45	0.80 J
3/21/2016	<0.65	<1.90	<0.45	0.55 J	
8/3/2016	<0.65	<1.90	<0.45	5.30	
5/18/2017	<0.50	<1.30	<0.41	3.10	
MW-10	9/30/2003	<5.00	<0.36	<5.00	0.63
	5/27/2004	<5.00	<0.36	<5.00	0.71
	8/20/2004	<5.00	<0.36	<5.00	4.92
	11/18/2004	<5.00	<0.36	<5.00	5.90
	4/26/2005	<5.00	5.06	<5.00	7.04
	7/19/2005	<1.00	17.0	<0.50	1.30
	11/23/2005	<1.00	<0.20	<0.50	1.40
	3/16/2006	<1.00	<0.20	<0.50	2.90
	4/9/2007	<1.00	<0.20	<0.50	2.30
	1/22/2008	<1.00	<0.20	<0.50	0.88
	5/19/2009	<1.00	<0.30	<0.50	0.57 J
	1/17/2014	<0.44	<0.39	<0.42	<0.36
	4/18/2014	<0.37	<0.50	<0.26	<0.33
	7/18/2014	<0.37	<0.50	<0.26	0.36 J
10/17/2014	<0.37	<0.50	<0.26	0.35 J	
ES (ppb)	-	400	3	70	5
PAL (ppb)	-	8	0.3	7	0.5

Notes:

- 1.) Concentrations in **red bold** exceed their respective enforcement standard (ES)
- 2.) Concentrations in **blue italics** exceed their respective preventive action limit (PAL)

**A.1. Groundwater Analytical Table (Page 4 of 6)
Former Amron Property - 525 Progress Drive
Waukesha, WI**

Well ID	Sampling Date	Chloro-ethane (ppb)	Chloro-methane (ppb)	cis-1,2-Dichloro-ethene (ppb)	TCE (ppb)
MW11	9/30/2003	<5.00	<0.36	<5.00	42.4
	5/27/2004	<5.00	<0.36	<5.00	25.3
	8/20/2004	<5.00	<0.36	<5.00	46.9
	11/18/2004	<5.00	<0.36	<5.00	161
	4/26/2005	<5.00	4.80	<5.00	59.3
	7/19/2005	<1.00	13.0	<0.50	53.0
	11/23/2005	<1.00	<0.20	<0.50	47.0
	3/16/2006	<1.00	<0.20	<0.50	48.0
	4/9/2007	<1.00	<0.20	1.10 J	110
	1/22/2008	<1.00	<i>0.44 J</i>	3.60	170
	5/19/2009	<1.00	<0.60	1.50 J	130
	1/17/2014	<0.44	<i>0.47 J</i>	2.40	96.3
	4/18/2014	<0.37	<0.50	0.57 J	67.5
	7/18/2014	<0.37	<0.50	<0.26	25.6
	10/17/2014	<0.37	<0.50	<0.26	39.0
	7/15/2015	<0.65	<1.90	<0.45	<i>2.85</i>
5/18/2017	<0.50	<1.30	<0.41	22.0	
MW-12	5/27/2004	<5.00	<0.36	<5.00	69.3
	8/20/2004	NA	NA	NA	127
	11/18/2004	NA	NA	NA	201
	4/26/2005	<5.00	5.69	<5.00	202
	7/19/2005	<1.00	4.30	<0.50	140
	11/23/2005	<2.00	<0.40	<1.00	94.0
	3/16/2006	<2.00	<0.40	<1.00	89.0
	4/9/2007	<2.00	<0.40	3.10 J	150
	1/22/2008	<2.00	<0.40	4.00	170
	5/19/2009	<2.00	<0.60	2.70 J	180
	1/17/2014	<0.44	<i>0.41 J</i>	2.00	103
	4/18/2014	<0.37	<0.50	3.10	119
	7/18/2014	<0.37	<0.50	0.60 J	139
	10/17/2014	<0.37	<0.50	<0.26	79.5
	7/15/2015	<0.65	<1.90	<0.45	36.0
	10/23/2015	<0.65	<1.90	<0.45	34.0
8/3/2016	<0.65	<1.90	<0.45	59.0	
5/18/2017	<0.50	<1.30	<0.41	46.0	
7/20/2018	<0.61	<0.54	<0.37	15.3	
10/9/2018	<0.61	<0.54	<0.37	15.0	
ES (ppb)	-	400	3	70	5
PAL (ppb)	-	8	0.3	7	0.5

Notes:

- 1.) Concentrations in **red bold** exceed their respective enforcement standard (ES)
- 2.) Concentrations in *blue italics* exceed their respective preventive action limit (PAL)

**A.1. Groundwater Analytical Table (Page 5 of 6)
Former Amron Property - 525 Progress Drive
Waukesha, WI**

Well ID	Sampling Date	Chloro-ethane (ppb)	Chloro-methane (ppb)	cis-1,2-Dichloro-ethene (ppb)	TCE (ppb)
MW-13	7/2/2004	NA	NA	NA	109
	8/20/2004	NA	NA	NA	114
	11/18/2004	NA	NA	NA	130
	4/26/2005	<5.00	6.99	<5.00	182
	7/19/2005	<2.00	3.60	1.00	120
	11/23/2005	<2.00	<0.40	<1.00	89.0
	3/16/2006	<2.00	<0.40	<1.00	98.0
	4/9/2007	<2.00	<0.40	4.90 J	160
	1/22/2008	<2.00	<0.40	<1.00	90.0
	5/19/2009	<2.00	<0.60	<1.00	34.0
	1/17/2014	<0.44	<0.39	<0.42	30.3
	4/18/2014	<0.37	<0.50	1.40	34.3
	7/18/2014	<0.37	<0.50	2.10	69.5
	10/17/2014	<0.37	<0.50	0.55 J	50.6
	7/15/2015	<0.65	<1.90	<0.45	47.0
	10/23/2015	<0.65	<1.90	<0.45	50.0
3/21/2016	<0.65	<1.90	<0.45	30.8	
8/3/2016	<0.65	<1.90	<0.45	36.0	
5/18/2017	<0.50	<1.30	0.42 J	33.0	
MW-14	11/23/2005	<2.00	<0.40	3.10	230
	3/16/2006	<5.00	<5.00	<2.50	190
	4/9/2007	<5.00	<5.00	6.80	200
	1/22/2008	<2.00	<0.40	<1.00	85.0
	5/19/2009	<2.00	<0.60	<1.00	32.0
	1/17/2014	<0.44	<0.39	1.30	50.6
	4/18/2014	<0.37	<0.50	4.40	53.6
	7/18/2014	<0.37	<0.50	0.91 J	76.8
	10/17/2014	<0.37	<0.50	0.42 J	64.6
	7/15/2015	<0.65	<1.90	<0.45	49.0
	10/23/2015	<0.65	<1.90	0.51 J	81.0
	3/21/2016	<0.65	<1.90	0.76 J	76.0
	8/3/2016	<0.65	<1.90	1.90	66.0
	5/18/2017	<0.50	<1.30	0.51 J	19.0
7/20/2018	<0.61	<0.54	<0.37	3.80	
10/9/2018	<0.61	<0.54	<0.37	2.82	
MW-15	11/23/2005	<1.00	<0.20	<0.50	8.80
	3/16/2006	<1.00	<0.20	<0.50	8.90
	4/9/2007	<1.00	<0.20	<0.50	0.97
	1/22/2008	<1.00	<0.20	<0.50	0.25 J
	5/19/2009	<1.00	<0.30	<0.50	0.63 J
	1/17/2014	<0.44	<0.39	<0.42	<0.36
	4/18/2014	<0.37	<0.50	<0.26	<0.33
	7/18/2014	<0.37	<0.50	<0.26	<0.33
	10/17/2014	<0.37	<0.50	<0.26	<0.33
	7/15/2015	<0.65	<1.90	<0.45	<0.47
	3/21/2016	<0.65	<1.90	<0.45	0.81 J
	8/3/2016	<0.65	<1.90	<0.45	<0.47
	5/18/2017	<0.50	<1.30	<0.41	<0.45
ES (ppb)	-	400	3	70	5
PAL (ppb)	-	8	0.3	7	0.5

Notes:

- 1.) Concentrations in **red bold** exceed their respective enforcement standard (ES)
- 2.) Concentrations in **blue italics** exceed their respective preventive action limit (PAL)

**A.1. Groundwater Analytical Table (Page 6 of 6)
Former Amron Property - 525 Progress Drive
Waukesha, WI**

Well ID	Sampling Date	Chloro-ethane (ppb)	Chloro-methane (ppb)	cis-1,2-Dichloro-ethene (ppb)	TCE (ppb)
MW-16	5/21/2014	<0.37	<0.50	0.34 J	21.1
	7/21/2014	<0.37	<0.50	0.44 J	22.7
	10/16/2014	<0.37	<0.50	0.42 J	29.0
	7/15/2015	<0.65	<1.90	<0.45	28.5
	10/23/2015	<0.65	<1.90	<0.45	25.7
	3/21/2016	<0.65	<1.90	<0.45	11.7
	8/3/2016	<0.65	<1.90	<0.45	9.60
	5/18/2017	<0.50	<1.30	<0.41	14.9
	7/20/2018	<0.61	<0.54	<0.37	<i>4.40</i>
	10/9/2018	<0.61	<0.54	<0.37	6.30
MW-17	7/15/2015	<0.65	<1.90	<0.45	8.50
	10/23/2015	<0.65	<1.90	<0.45	17.7
	3/21/2016	<0.65	<1.90	<0.45	14.9
	8/3/2016	<0.65	<1.90	<0.45	13.6
	5/18/2017	<0.50	<1.30	<0.41	10.7
	7/20/2018	<0.61	<0.54	<0.37	<i>3.60</i>
	10/9/2018	<0.61	<0.54	<0.37	<i>4.90</i>
MW-18	7/20/2018	<0.61	<0.54	<0.37	8.90
	10/9/2018	<0.61	<0.54	<0.37	14.6
MW-19	7/20/2018	<0.61	<0.54	<0.37	16.9
	10/9/2018	<0.61	<0.54	<0.37	21.5
<i>ES (ppb)</i>	-	400	3	70	5
<i>PAL (ppb)</i>	-	8	0.3	7	0.5

Notes:

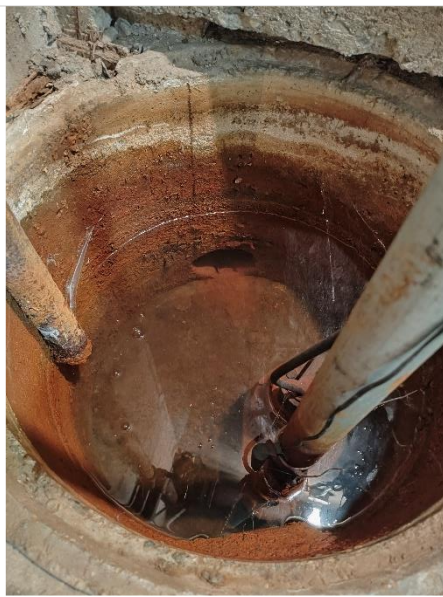
- 1.) Concentrations in **red bold** exceed their respective enforcement standard (ES)
- 2.) Concentrations in *blue italics* exceed their respective preventive action limit (PAL)

Attachment 3



PHOTOGRAPH 1:

Sump crock full 8/7/2023



PHOTOGRAPH 2:

Drain tile exposed 8/11/2023



PHOTOGRAPH 3:

Drain tile exposed 8/11/2023