



February 28, 2019

Mr. Gerald DeMers
Environmental Engineer
Wisconsin Department of Natural Resources
141 NW Barstow Street, Room 180
Waukesha, WI 53188

RE: Soil Disposal Information Associated with the R&R Excavating Site
Located on Highway I in the Town of Cedarburg, Wisconsin — FEC
Project No. 041013

Dear Mr. Demers:

As you are aware, *Friess Environmental Consulting, Inc. (FEC)* has submitted requests for disposal of soils from construction projects at the above-referenced site (the "Site") under the Wisconsin Department of Natural Resources (DNR) low-hazard exemption (LHE) per s. 289.43(8) of the Wisconsin Statutes and/or the exemption per ch. NR 718.12 Wisconsin Administrative Code (WAC). The DNR did grant approval for two projects to dispose of soils in 2018. Several of the approvals required the submittal of an annual report to include a listing of projects that brought soils to the former R&R Excavating site, an estimate of the remaining disposal capacity, and the results of groundwater sampling and analytical testing conducted at the Site. This letter provides documentation for soils disposed of in 2018 and the results of continued groundwater monitoring.

In 2018, FEC documented the disposal of 392 truckloads. It is estimated that each truck contained approximately 10 yards. As such, approximately 3,920 cubic yards of soil were disposed of at the Site in 2018. A summary of the filling operations per month is included on the attached Table. It is estimated that the remaining capacity at the Site is approximately 394,600 cubic yards.

In accordance with the requirements set forth in ch. NR 718.12(1)(c) WAC and as outlined in the approved reclamation plan for the Site, placement of the soils at the Site did not occur within a floodplain; within 100 feet of any wetland or critical habitat area; within 300 feet of any navigable river, stream, lake, pond or flowage; within 100 feet of any on-site water supply well or 300 feet of any off-site water supply well, within 3 feet of the groundwater table, in an area where

single family housing will be the final use, or as use as an exposed final grade layer.

The results of soil and groundwater analytical testing conducted on the source sites were provided to the DNR in each exemption request that was submitted and reviewed by the DNR. The results continue to demonstrate that the PAH and metals detected within the soils are not considered a risk to groundwater. The exposure pathways are further protected with the conditions of the Site, including the final use of the Site as agricultural (no development or potable wells) and capping of the Site with at least 2 feet of clean material, and the approved reclamation plan for the Site.

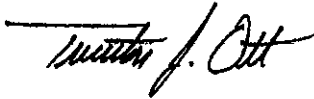
On July 10, 2018, FEC collected a grab sample from the stormwater pond (SW). A groundwater sample could not be obtained from the monitoring well during the July 2018 sampling event as the monitoring well was damaged and not accessible during the July 2018 sampling event. The well was repaired in December 2018. On December 29, 2018, FEC collected a groundwater sample from MW-1; however, a stormwater sample could not be obtained at that time as the stormwater was frozen during the December 2018 sampling event. The water samples collected were submitted to a DNR-certified laboratory for analyses of volatile organic compounds (VOCs), polycyclic aromatic hydrocarbons (PAHs) and select RCRA metals. No VOCs, PAHs, or select RCRA metals were detected in the water samples except for several low level or "J Flag" concentrations. The detections are likely attributable to slight turbidity in the samples collected. The results of all the testing were well below their applicable DNR groundwater quality standards. The analytical reports are included with this letter.

As indicated above, MW-1 was damaged during the grading activities on the site. Suspended solids were apparent in the groundwater sample during the last sampling round. FEC will redevelop the well in Spring 2019 and evaluate the integrity of the well. Stormwater levels on the site have increase as a result of the completed filling operation on the neighboring Rettmann property and the continued filling operations on the site. As such, FEC will also evaluate the need for stormwater management as part of future filling activities.

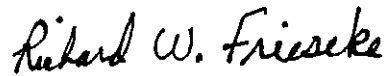
We hope this letter provides sufficient information regarding disposal of material in 2018 at the R&R Excavating Site. If you have any questions or comments regarding this submittal, please contact us at (414) 228-9815.

Respectfully,

Friess Environmental Consulting, Inc.



Trenton J. Ott
Project Manager



Richard W. Frieseke, P.E.
President

CC: Mr. Barry Sullivan; Ozaukee County Resource Board
Mr. Richard Charmoli; Charmoli Holdings, LLC

041013 2018

**Table 1
VOC Groundwater Analytical Results
R&R Excavating Site - CDS
Cedarburg, Wisconsin**

Sample Location	Sampling Date	Benzene (ppb)	Chloroethane (ppb)	1,1-DCA (ppb)	1,2-DCA (ppb)	1,1-DCE (ppb)	cis-1,2-DCE (ppb)	Ethylbenzene (ppb)	MTBE (ppb)	Naphthalene (ppb)	Toluene (ppb)	1,1,1-TCA (ppb)	TCE (ppb)	Combined TMBs (ppb)	Vinyl Chloride (ppb)	Total Xylenes (ppb)
QP-1	6/7/12	<0.50	<1.40	<0.98	<0.50	<0.60	<0.74	<0.78	<0.80	<2.10	<0.53	<0.85	<0.47	<1.54	<0.18	<1.90
SW	10/27/15	<0.44	<0.65	<1.1	<0.48	<0.65	<0.45	<0.71	<1.1	<1.6	<0.44	<0.84	<0.47	<3.10	<0.17	<3.10
	6/16/16	<0.44	<0.65	<1.1	<0.48	<0.65	<0.45	<0.71	<1.1	<1.6	<0.44	<0.84	<0.47	<3.10	<0.17	<3.10
	11/3/16	<0.44	<0.65	<1.1	<0.48	<0.65	<0.45	<0.71	<1.1	<1.6	<0.44	<0.84	<0.47	<3.10	<0.17	<3.10
	6/22/17	<0.44	<0.65	<1.1	<0.48	<0.65	<0.45	<0.71	<1.1	<1.6	<0.44	<0.84	<0.47	<3.10	<0.17	<3.10
	10/20/17	<0.44	<0.65	<1.1	<0.48	<0.65	<0.45	<0.71	<1.1	<1.6	<0.44	<0.84	<0.47	<3.10	<0.17	<3.10
	7/10/18	<0.22	<0.61	<0.36	<0.25	<0.42	<0.37	<0.26	<0.28	<2.1	<0.19	<0.33	<0.3	<1.2	<0.2	<0.71
MW-1	8/22/12	<0.50	<1.40	<0.98	<0.50	<0.60	<0.74	<0.78	<0.80	<2.10	<0.53	<0.85	<0.47	<1.54	<0.18	<1.90
	8/30/13	<0.24	<0.63	<0.30	<0.41	<0.40	<0.38	<0.55	<0.23	<1.70	<0.69	<0.33	<0.33	<3.60	<0.18	<1.32
	12/6/13	<0.24	<0.63	<0.30	<0.41	<0.40	<0.38	<0.55	<0.23	<1.70	<0.69	<0.33	<0.33	<3.60	<0.18	<1.32
	5/9/14	<0.24	<0.63	<0.30	<0.41	<0.40	<0.38	<0.55	<0.23	<1.70	<0.69	<0.33	<0.33	<3.60	<0.18	<1.32
	9/10/14	<0.24	<0.63	<0.30	<0.41	<0.40	<0.38	<0.55	<0.23	<1.70	<0.69	<0.33	<0.33	<3.60	<0.18	<1.32
	10/27/15	<0.44	<0.65	<1.1	<0.48	<0.65	<0.45	<0.71	<1.1	<1.6	<0.44	<0.84	<0.47	<3.10	<0.17	<3.10
	6/16/16	<0.44	<0.65	<1.1	<0.48	<0.65	<0.45	<0.71	<1.1	<1.6	<0.44	<0.84	<0.47	<3.10	<0.17	<3.10
	11/3/16	<0.44	<0.65	<1.1	<0.48	<0.65	<0.45	<0.71	<1.1	<1.6	<0.44	<0.84	<0.47	<3.10	<0.17	<3.10
	6/22/17	<0.44	<0.65	<1.1	<0.48	<0.65	<0.45	<0.71	<1.1	<1.6	<0.44	<0.84	<0.47	<3.10	<0.17	<3.10
	10/20/17	<0.44	<0.65	<1.1	<0.48	<0.65	<0.45	<0.71	<1.1	<1.6	<0.44	<0.84	<0.47	<3.10	<0.17	<3.10
	12/29/18	<0.22	<0.61	<0.36	<0.25	<0.42	<0.37	<0.26	<0.28	<2.1	3.20	<0.33	<0.3	<1.2	<0.2	<0.71
	ES (ppb)	-	5	400	850	5	7	70	700	60	100	1,000	200	5	480	0.02
PAL (ppb)	-	0.5	80	85	0.5	0.7	7	140	12	10	200	40	0.5	96	0.2	1,000

Notes:
 Concentrations that exceed their respective PALs are in *blue italics*.
 Concentrations that exceed their respective ESs are in red bold type.
 J Concentration detected slightly above LOD and likely attributable to sediment in sample or laboratory artifact

Table 2
Groundwater PAH & Metals Analytical Results
R&R Excavating Site - CDS
Cedarburg, Wisconsin

Test Description	QP-1	MW-1	MW-1	MW-1	MW-1	MW-1	MW-1	MW-1	SW-1	MW-1	SW-1	MW-1	SW-1	MW-1	SW-1	MW-1	SW-1	MW-1	SW-1	NR 140 PAL	NR 140 ES		
Sample Date	6/7/12	8/22/12	6/5/12	8/5/12	12/6/12	5/9/14	9/10/14	10/27/15	10/27/15	6/16/16	6/16/16	11/0/16	11/5/16	6/22/17	6/22/17	10/20/17	10/20/17	7/10/18	12/26/18				
PAHs (µg/g)																							
acenaphthene	<0.025	0.037J	<0.025	<0.021	<0.021	<0.021	<0.021	<0.021	<0.021	0.076	0.032J	<0.016	<0.016	<0.016	<0.016	<0.016	<0.016	<0.016	<0.016	<0.016	-	-	
acenaphthylene	<0.019	<0.019	<0.019	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	0.058J	<0.02	<0.019	<0.019	0.033J	<0.019	0.033J	<0.019	<0.019	<0.019	<0.019	-	-	
anthracene	<0.018	0.023	<0.018	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	<0.019	<0.019	<0.019	<0.019	<0.019	<0.019	<0.019	<0.019	<0.019	600	3,000	
benzo[a]anthracene	<0.024	0.026J	<0.024	<0.025	<0.025	0.031J	<0.025	<0.025	<0.025	<0.025	<0.025	<0.017	<0.017	<0.019	0.0187J	<0.017	<0.017	<0.017	<0.017	<0.017	-	-	
benzo[b]fluoranthene	<0.018	<0.018	<0.018	<0.018	<0.018	<0.018	<0.02	<0.02	<0.02	<0.02	<0.02	<0.021	<0.021	<0.021	<0.021	<0.021	<0.021	<0.021	<0.021	<0.021	0.02	0.2	
benzo[b]fluoranthene	<0.02	0.022J	<0.02	<0.02	<0.02	<0.02	<0.019	<0.019	<0.019	<0.019	<0.019	<0.018	<0.018	<0.018	<0.018	<0.018	<0.018	<0.018	<0.018	<0.018	0.02	0.2	
benzo[k]fluoranthene	<0.019	0.021J	<0.019	<0.023	<0.023	<0.023	<0.024	<0.024	<0.024	<0.024	<0.024	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	-	-	
benzo[e]fluoranthene	<0.022	<0.022	<0.022	<0.027	<0.027	<0.027	<0.027	<0.027	<0.027	<0.027	<0.027	<0.027	<0.027	0.0168J	0.0168J	<0.016	<0.016	<0.016	<0.016	<0.016	<0.016	0.02	0.2
chrysene	<0.019	0.021J	<0.019	<0.018	<0.018	<0.018	<0.018	<0.018	<0.018	<0.018	<0.018	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	-	-	
dibenz[a,h]anthracene	<0.019	<0.019	<0.019	<0.023	<0.023	<0.023	<0.028	<0.028	<0.028	<0.028	<0.028	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	<0.025	-	-	
fluoranthene	<0.022	0.043J	<0.022	<0.026	<0.026	<0.026	<0.028	<0.028	<0.028	<0.028	<0.028	0.021J	0.021J	0.021J	0.021J	0.021J	0.021J	0.021J	0.021J	0.021J	80	400	
fluorene	<0.02	0.027J	<0.02	<0.02	<0.02	<0.02	<0.022	<0.022	<0.022	<0.022	<0.022	0.021J	0.021J	0.021J	0.021J	0.021J	0.021J	0.021J	0.021J	0.021J	80	400	
indeno[1,2,3-cd]pyrene	<0.018	<0.018	<0.018	<0.027	<0.027	<0.027	<0.027	<0.027	<0.027	<0.027	<0.027	<0.023	<0.023	<0.023	<0.023	<0.023	<0.023	<0.023	<0.023	<0.023	-	-	
1-methylnaphthalene	<0.022	<0.022	<0.022	<0.019	<0.019	<0.019	<0.021	<0.021	<0.021	<0.021	0.072	<0.024	<0.024	<0.024	<0.024	<0.024	<0.024	<0.024	<0.024	0.0296J	0.0296J	-	-
2-methylnaphthalene	<0.024	<0.024	<0.024	<0.016	<0.016	<0.016	<0.024	<0.024	<0.024	<0.024	0.066	<0.024	<0.024	0.0248J	<0.024	<0.024	<0.024	<0.024	<0.024	0.033J	0.033J	-	-
naphthalene	<0.021	<0.021	<0.021	<0.023	<0.023	0.033J	0.026J	0.026J	0.029J	0.037	<0.023	<0.019	<0.023	<0.023	<0.023	<0.023	<0.023	<0.023	<0.023	<0.023	10	100	
phenanthrene	<0.019	<0.019	<0.019	0.035J	<0.018	<0.018	<0.018	<0.018	0.033J	0.251	0.181	0.037J	0.037J	0.037J	0.037J	0.037J	0.037J	0.037J	0.037J	0.037J	-	-	
pyrene	<0.02	0.036J	<0.02	<0.025	<0.025	<0.025	<0.022	<0.022	<0.022	<0.022	<0.022	<0.022	<0.022	<0.022	<0.022	<0.022	<0.022	<0.022	0.0316J	<0.03	0.0316J	50	250
Metals (mg/kg)																							
arsenic	<0.25	0.61J	NA	<0.60	<0.6	<0.60	<0.6	<0.6	1.0J	<0.60	<0.60	<0.6	<0.6	<0.7	<0.7	1.3J	0.8J	2.5	0.8J	5	50		
barium	<0.36	63	NA	15.5	NA	18.3	NA	NA	NA	16.7J	12.47J	NA	NA	NA	NA	NA	NA	NA	NA	NA	400	2,000	
cadmium	<0.16	0.22J	NA	<0.50	NA	<0.50	NA	NA	NA	<0.30	<0.30	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.5	5	
chromium	0.57	0.92J	NA	<2.60	NA	<2.60	NA	NA	NA	<1.80	<1.80	NA	NA	NA	NA	NA	NA	NA	NA	NA	10	100	
lead	<0.24	1.7	NA	<0.70	<0.7	<0.70	<0.7	<0.7	<0.7	<0.80	<0.80	<0.8	<0.8	<0.9	<0.9	<0.9	<0.9	<0.9	<0.9	<0.8	<0.9	15	15
mercury	0.02	<0.015	NA	<0.04	NA	<0.04	NA	NA	NA	<0.11	<0.11	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.2	2	
selenium	<0.38	2.5	NA	<2.00	NA	<2.00	NA	NA	NA	<1.10	<1.10	NA	NA	NA	NA	NA	NA	NA	NA	NA	10	50	
silver	<0.31	<0.31	NA	<10.3	NA	<10.3	NA	NA	NA	<8.4	<8.4	NA	NA	NA	NA	NA	NA	NA	NA	NA	10	50	

Notes
1. "-" = not analyzed or no standards have been established.
2. J = Concentration detected slightly above LOD and likely attributable to sediment in sample.
3. Concentrations in red bold exceed their respective enforcement standards (ESs).

Table 3
Groundwater Elevation Measurements
R&R Excavating Site - CDS
Cedarburg, Wisconsin

Well Number	Date	*Total Well Depth	Ground Surface Elevation	Top of Casing Elevation	*Depth to Water Below Casing	Groundwater Elevation
MW-1	8/21/2012	90.00	832.30	835.50	70.21	765.29
	5/10/2013				66.87	768.63
	8/29/2013				69.82	765.68
	12/6/2013				66.87	768.63
	5/9/2014				67.41	768.09
	9/10/2014				65.40	770.10
	10/27/2015				59.57	775.93
	6/19/2016				52.22	783.28
	11/3/2016				48.80	786.70
	6/22/2017				39.93	795.57
	10/20/2017				100.00	845.50
	12/29/2018	90.00	835.50	22.22	813.28	

Notes:

1. *Measured from the north rim of the top of well casing.
2. All measurements are presented in feet.
3. Elevations are referenced to monument benchmark SE 1/4 of the NE 1/4 corner of Section 22 T 10N R 21E which has an elevation of 833.26 feet.

Synergy Environmental Lab, INC.

1990 Prospect Ct., Appleton, WI 54914 *P 920-830-2455 * F 920-733-0631

RICK FRIESEKE
FEC. INC.
6635 N. SIDNEY PLACE
MILWAUKEE, WI 53209

Report Date 19-Jul-18

Project Name R&R EXCAVATING
Project # 041013
Lab Code 5034902A
Sample ID SW
Sample Matrix Water
Sample Date 7/10/2018

Invoice # E34902

	Result	Unit	LOD	LOQ	Dil	Method	Ext Date	Run Date	Analyst	Code
Inorganic										
Metals										
Arsenic, Dissolved	2.5	ug/L	0.6	2	1	7060A	7/12/2018	7/12/2018	CWT	1
Lead, Dissolved	< 0.8	ug/L	0.8	2.7	1	7421	7/13/2018	7/13/2018	CWT	1
Organic										
PAH SIM										
Acenaphthene	0.0099 "J"	ug/l	0.008	0.025	1	M8270C	7/12/2018	7/12/2018	NJC	1
Acenaphthylene	0.0136 "J"	ug/l	0.009	0.028	1	M8270C	7/12/2018	7/12/2018	NJC	1
Anthracene	< 0.009	ug/l	0.009	0.03	1	M8270C	7/12/2018	7/12/2018	NJC	1
Benzo(a)anthracene	< 0.017	ug/l	0.017	0.054	1	M8270C	7/12/2018	7/12/2018	NJC	1
Benzo(a)pyrene	< 0.017	ug/l	0.017	0.055	1	M8270C	7/12/2018	7/12/2018	NJC	1
Benzo(b)fluoranthene	< 0.02	ug/l	0.02	0.063	1	M8270C	7/12/2018	7/12/2018	NJC	1
Benzo(g,h,i)perylene	< 0.011	ug/l	0.011	0.036	1	M8270C	7/12/2018	7/12/2018	NJC	1
Benzo(k)fluoranthene	< 0.014	ug/l	0.014	0.044	1	M8270C	7/12/2018	7/12/2018	NJC	1
Chrysene	< 0.019	ug/l	0.019	0.062	1	M8270C	7/12/2018	7/12/2018	NJC	1
Dibenzo(a,h)anthracene	< 0.01	ug/l	0.01	0.031	1	M8270C	7/12/2018	7/12/2018	NJC	1
Fluoranthene	< 0.031	ug/l	0.031	0.098	1	M8270C	7/12/2018	7/12/2018	NJC	1
Fluorene	< 0.011	ug/l	0.011	0.034	1	M8270C	7/12/2018	7/12/2018	NJC	1
Indeno(1,2,3-cd)pyrene	< 0.012	ug/l	0.012	0.038	1	M8270C	7/12/2018	7/12/2018	NJC	1
1-Methyl naphthalene	0.0296 "J"	ug/l	0.0239	0.076	1	M8270C	7/12/2018	7/12/2018	NJC	1
2-Methyl naphthalene	0.033 "J"	ug/l	0.0236	0.0751	1	M8270C	7/12/2018	7/12/2018	NJC	1
Naphthalene	0.079	ug/l	0.023	0.073	1	M8270C	7/12/2018	7/12/2018	NJC	1
Phenanthrene	0.035 "J"	ug/l	0.025	0.081	1	M8270C	7/12/2018	7/12/2018	NJC	1
Pyrene	< 0.03	ug/l	0.03	0.095	1	M8270C	7/12/2018	7/12/2018	NJC	1
VOC's										
Benzene	< 0.22	ug/l	0.22	0.71	1	8260B	7/12/2018	7/12/2018	CJR	1
Bromobenzene	< 0.44	ug/l	0.44	1.38	1	8260B	7/12/2018	7/12/2018	CJR	1
Bromodichloromethane	< 0.33	ug/l	0.33	1.06	1	8260B	7/12/2018	7/12/2018	CJR	1
Bromoform	< 0.45	ug/l	0.45	1.44	1	8260B	7/12/2018	7/12/2018	CJR	1
tert-Butylbenzene	< 0.25	ug/l	0.25	0.8	1	8260B	7/12/2018	7/12/2018	CJR	1

Summary of 2018 Filling Operations R&R Excavating Site Town of Cedarburg

FEC Project #	Project Name	# of Truckloads	Month	Year
150805	Grafton	30	June	2018
		13	August	2018
		<u>2</u>	October	2018
		Total	45	
161101	Griot	6	March	2018
		<u>4</u>	May	2018
Total		10		
160402	Shorewood Senior	59	February	2018
		<u>36</u>	March	2018
Total		95		
170702	Innovation Park Hotel	<u>126</u>	April/July	2018
Total		126		
171103	Franklin Place	<u>116</u>	May	2018
2018 Total		<u>392</u>		

Summary of Filling Operations
 January 1, 2018 to December 31, 2018

R&R Excavating Site -Town of Cedarburg

FEC Project #	Project Name	# of Truckloads	Month	Year
041013	Charmoli Holdings			
		59	February	2018
		42	March	2018
		99	April	2018
		120	May	2018
		30	June	2018
		27	July	2018
		13	August	2018
		2	October	2018
	Total	392		