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 1, 2021

MR MITCH HUBERT
PERIMITER SOLUTIONS
DBA THE SOLBERG CO
1520 BROOKFIELD AVE
GREEN BAY, WI 54313
Via Electronic Mail Only to Mitch.Hubert@perimeter-solutions.com

KEEP THIS LEGAL DOCUMENT WITH YOUR PROPERTY RECORDS

SUBJECT: Case Closure with Continuing Obligations
The Solberg Co, 1520 Brookfield Avenue, Village of Howard, WI 54313
BRRTS #: 03-05-584180, FID #: 405227020

Dear Mr. Hubert,

The Wisconsin Department of Natural Resources (DNR) is pleased to inform you that The Solberg Co. contamination case identified above met the requirements of Wisconsin Administrative (Wis. Admin.) Code chs. NR 700 to 799 for case closure with continuing obligations (COs). COs are legal requirements to address potential exposure to remaining contamination. No further investigation or remediation is required at this time for the reported hazardous substance discharge and/or environmental pollution.

However, you, future property owners and occupants of the property must comply with the COs as explained in this letter, which may include maintaining certain features and notifying the DNR and obtaining approval before taking specific actions. You must provide this letter and all enclosures to anyone who purchases, rents or leases this property from you.

This case closure decision is issued under Wis. Admin. Code chs. NR 700 to 799 and is based on information received by the DNR to date. The DNR reviewed the case closure request for compliance with state laws and standards and determined the case closure request met the notification requirements of Wis. Admin. Code ch. NR 725, the response action goals of Wis. Admin. Code § NR 726.05(4), and the case closure criteria of Wis. Admin. Code §§ NR 726.05, 726.09, 726.11, and Wis. Admin. Code ch. NR 140.

The Solberg Co site (the "Site") was investigated for a discharge of hazardous substances and/or environmental pollution from an oil/water separator system comprised of three underground storage tanks (USTs) located to the east of the fire suppression testing building, as shown on the attached map (Figure B.1.b.1, Detailed Site Plan, October 2020). The site investigation was conducted within the vicinity of the release from the UST system. Case closure is granted for the Petroleum Volatile Organic Compounds (PVOCs) as documented in the case file. The remedial action consisted of excavation of approximately 133 tons of gasoline-impacted surface soils surrounding the UST system, and pumping and treating more than 40,000 gallons of gasoline-impacted water. The site investigation and remedial action addressed soil and groundwater. Contamination remains in groundwater in the area of the UST system. A second open case exists at this property, The Solberg Co – Site 2, BRRTS # 02-05-587486, which was created for PFAS related contamination identified during this investigation.

The case closure decision and COs required were based on the current use of the site for industrial purposes. The site is currently zoned industrial. Based on the land use and zoning, the site meets the industrial land use classification under Wis. Admin. Code § NR 720.05(5) for application of residual contaminant levels in soil.

SUMMARY OF CONTINUING OBLIGATIONS

COs are applied at the following locations:

ADDRESS (Village of Howard, WI)	COS APPLIED
1520 Brookfield Ave (Source Property)	• Residual Groundwater • Vapor Intrusion (VI) - Future Concern

CLOSURE CONDITIONS

Closure conditions are legally required conditions which include both COs and other requirements for case closure (Wis. Stat. § 292.12(2)). Under Wis. Stat. § 292.12(5), you, any subsequent property owners and occupants of the property must comply with the closure conditions as explained in this letter. The property owner must notify occupants for any condition specified in this letter under Wis. Admin. Code §§ NR 726.15(1)(b) and NR 727.05(2). If an occupant is responsible for maintenance of any closure condition specified in this letter, you and any subsequent property owner must include the condition in the lease agreement under Wis. Admin. Code § NR 727.05(3) and provide the maintenance plan to any occupant that is responsible.

DNR staff may conduct periodic pre-arranged inspections to ensure that the conditions included in this letter are met (Wis. Stat. § 292.11(8)). If these requirements are not followed, the DNR may take enforcement action under Wis. Stat. ch. 292 to ensure compliance with the closure conditions.

GROUNDWATER

Continuing Obligations to Address Groundwater Contamination and/or Monitoring Wells

Residual Groundwater Contamination (Wis. Admin. Code ch. NR 140 and § NR 812.09(4)(w))
Groundwater contamination which equals or exceeds the enforcement standards for PVOCs is present within the UST system area, as shown on the enclosed map (Figure B.3.b, Isoconcentration Map, October 2020). To construct a new well or reconstruct an existing well, the property owner must obtain prior DNR approval. Additional casing may be necessary to prevent contamination of the well.

Other Groundwater or Monitoring Well Related Closure Information

Transfer of Responsibility for Filling and Sealing Monitoring Wells (Wis. Admin. Code § NR 726.15(2)(c)3.)
The responsibility for monitoring wells MW-1, MW-2, and MW-3 is being transferred to another site undergoing environmental cleanup, The Solberg Co – Site 2, BRRTS # 02-05-587486, for continued monitoring. Do not fill and seal these wells at this time. Well filling and sealing will be required of the The Solberg Co – Site 2 site for closure, upon conclusion of the cleanup of that site. These wells are identified on the enclosed map (Figure B.3.d, Isoconcentration Map, October 2020).

VAPOR

Continuing Obligations to Address Vapor Contamination

Vapor intrusion (VI) is the movement of vapors coming from volatile chemicals in the soil or groundwater or within

preferential pathways into buildings where people may breathe air contaminated by the vapors.

VI - Future Concern: (Wis. Stat. § 292.12(2), Wis. Admin. Code § NR 726.15(2)(L) or (m), as applicable.
PVOCs remain in groundwater in the vicinity of the UST system, as shown on the enclosed map, (Figure B.3.b, Isoconcentration Map, October 2020), at concentrations that may be of concern for vapor intrusion in the future if a building is constructed, renovated or expanded in an area where no building currently exists, or if an existing building is remodeled. At the time of closure, there are two buildings present on the property; one building is utilized to perform fire suppression testing, and another building is an occupied office/warehouse.

Vapor control technologies are required for new construction or for modification of occupied buildings on the property unless the property owner assesses the vapor pathway and DNR agrees that vapor control technologies are not needed. The property owner shall maintain the current building use and layout.

See the Other Closure Requirements section for more details.

OTHER CLOSURE REQUIREMENTS

Pre-Approval Required for Well Construction (Wis. Admin. Code § NR 812.09(4)(w))
DNR approval is required before well construction or reconstruction for all sites identified as having residual contamination and/or COs. This requirement applies to private drinking water wells and high capacity wells. To obtain approval, the property owner is required to complete and submit Form 3300-254, Continuing Obligations/Residual Contamination Well Approval Application, to the DNR Drinking and Groundwater program's regional water supply specialist. A well driller can help complete this form. The form can be obtained online at dnr.wi.gov, search "3300-254." Additional casing may be necessary to help prevent contamination of the well.

General Wastewater Permits for Construction-related Dewatering Activities (Wis. Admin. Code ch. NR 200)
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 work and building construction.

If the property owner or any other person plans to conduct such activities, that person must contact the Water Quality Program and, if necessary, apply for the required discharge permit. 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, oil and grease, a general permit for pit/trench *Dewatering Operations* may be needed. Additional information can be obtained by visiting the DNR website at "dnr.wi.gov," search "wastewater general permits."

DNR NOTIFICATION AND APPROVAL REQUIREMENTS

Certain activities are limited at closed sites to maintain protectiveness to human health and the environment. The property owner is required to notify the DNR at least 45 days before and obtain approval from the DNR prior to taking the following actions (Wis. Admin. Code §§ NR 727.07, NR 726.15 (2), Wis. Stat. § 292.12(6)).

- Before constructing a building and/or modifying use of or the construction of an existing building or changing property use. Certain activities are limited at closed sites to reduce the risk of exposure to residual contamination via vapor intrusion. For properties with a continuing obligation for addressing the future risk of vapor intrusion when buildings exist at the time of closure approval, changes to the current building use and layout are prohibited without prior DNR approval. This includes any change in building construction, reconstruction or partial demolition. The DNR may require additional actions may be required at that time to re-assess for vapor intrusion and mitigate, as appropriate.

The DNR may require additional investigation and/or cleanup actions if necessary, to be protective of human health and the environment. The case may be reopened under Wis. Admin. Code § NR 727.13 if additional information indicates that contamination on or from the site poses a threat, or for a lack of compliance with a CO or closure requirement.

SUBMITTALS AND CONTACT INFORMATION

Site, case-related information and DNR contacts can be found online in the Bureau for Remediation and Redevelopment Tracking System (BRRTS) on the Web (BOTW); go to dnr.wi.gov and search "BOTW." Use the BRRTS ID # found at the top of this letter. The site can also be found on the map view, Remediation and Redevelopment Sites Map (RRSM) by searching "RRSM."

Send written notifications to the DNR using the RR Program Submittal Portal at dnr.wi.gov, search "RR submittal portal" (https://dnr.wi.gov/topic/Brownfields/Submittal.html). Questions on using this portal can be directed to the Project Manager below or to the environmental program associate (EPA) for the regional DNR office. Visit dnr.wi.gov, search "RR contacts" and select the EPA tab (https://dnr.wi.gov/topic/Brownfields/Contact.html).

CLOSING

The DNR appreciates your efforts to restore the environment at this site. If you have any questions regarding this this letter, please contact DNR project manager Josie Schultz at (920) 366-5685 or Josie.Schultz@Wisconsin.gov.

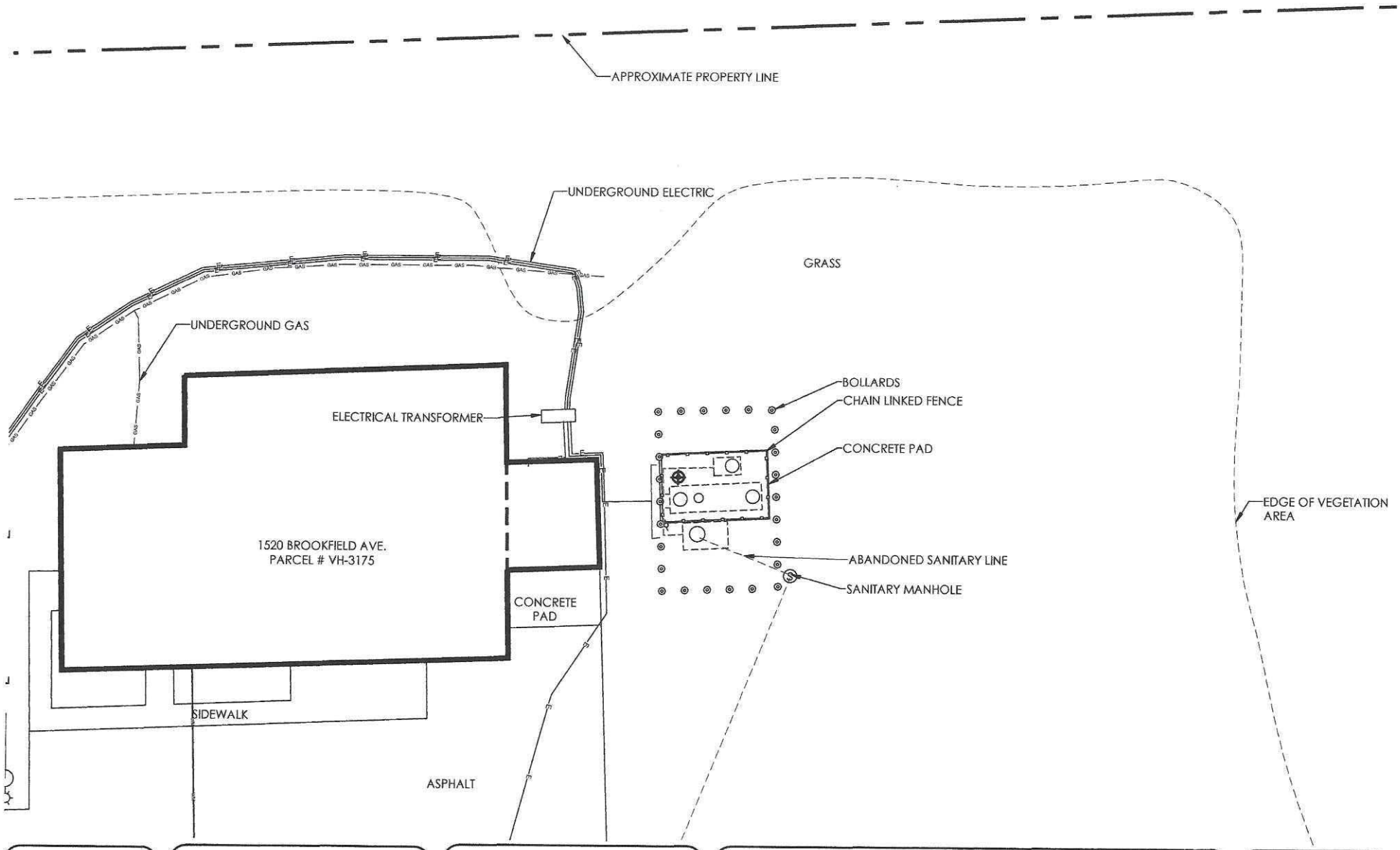
Sincerely,

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

Attachments:
Figure B.1.b.1, Detailed Site Plan, October 2020
Figure B.3.b, Isoconcentration Map, October 2020
Figure B.3.d., Monitoring Wells, October 2020

cc.
Pamela Havelka-Rivard, Perimeter Solutions DBA The Solberg Co (pamela.havelka-rivard@perimeter-solutions.com)
Beth Erdman, General Engineering Company (berdman@generalengineering.net)
Brian Youngwirth, General Engineering Company (byoungwirth@generalengineering.net)

Additional Resources:
The DNR fact sheets listed below can be obtained by visiting the DNR website at "dnr.wi.gov," search the DNR publication number.
Guidance for Electronic Submittals for the Remediation and Redevelopment Program (RR-690)
Continuing Obligations for Environmental Protection (RR-819)
Environmental Contamination and Your Real Estate (RR-973)
Post-Closure Modifications: Changes to Property Conditions after a State-Approved Cleanup (RR-987)
Using Natural Attenuation to Clean Up Contaminated Groundwater: What Landowners Should Know (RR-671)



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LEGEND

MW-2 MONITORING WELL

TANK SUMP

General Engineering Company

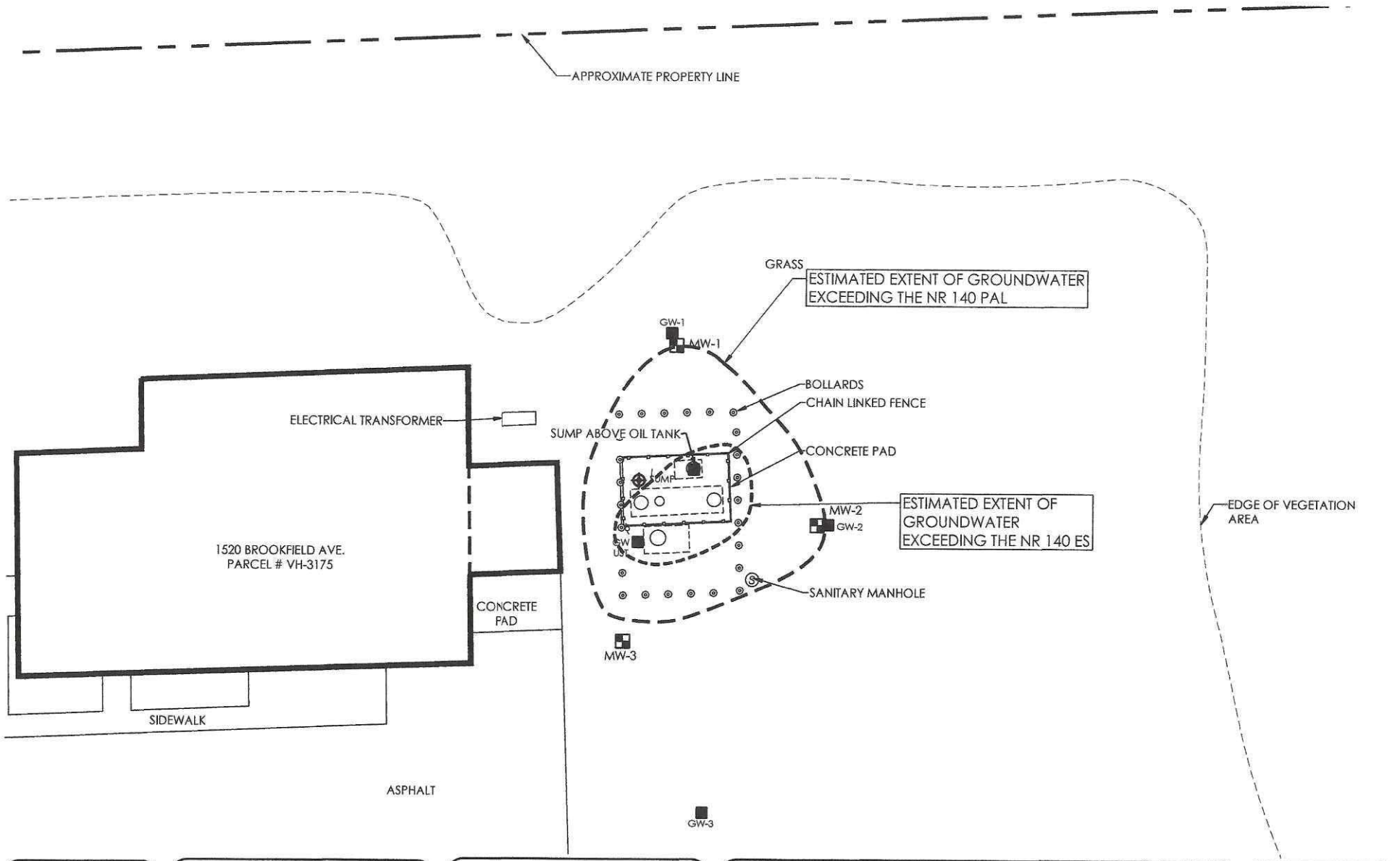
P.O. Box 340 • 916 Silver Lake Dr. • Portage, WI 53901
608-742-2169 (Office) • 608-742-2592 (Fax)
www.generalengineering.net

DETAILED SITE PLAN

THE SOLBERG COMPANY
1520 BROOKFIELD AVE.
VILLAGE OF HOWARD
BROWN COUNTY, WI

GEC

DRAWN BY	KSP
REVIEWED BY	LMB
ISSUE DATE	OCT. 2020
GEC FILE NO.	2-0919-397
SHEET NO.	B.1.b.1



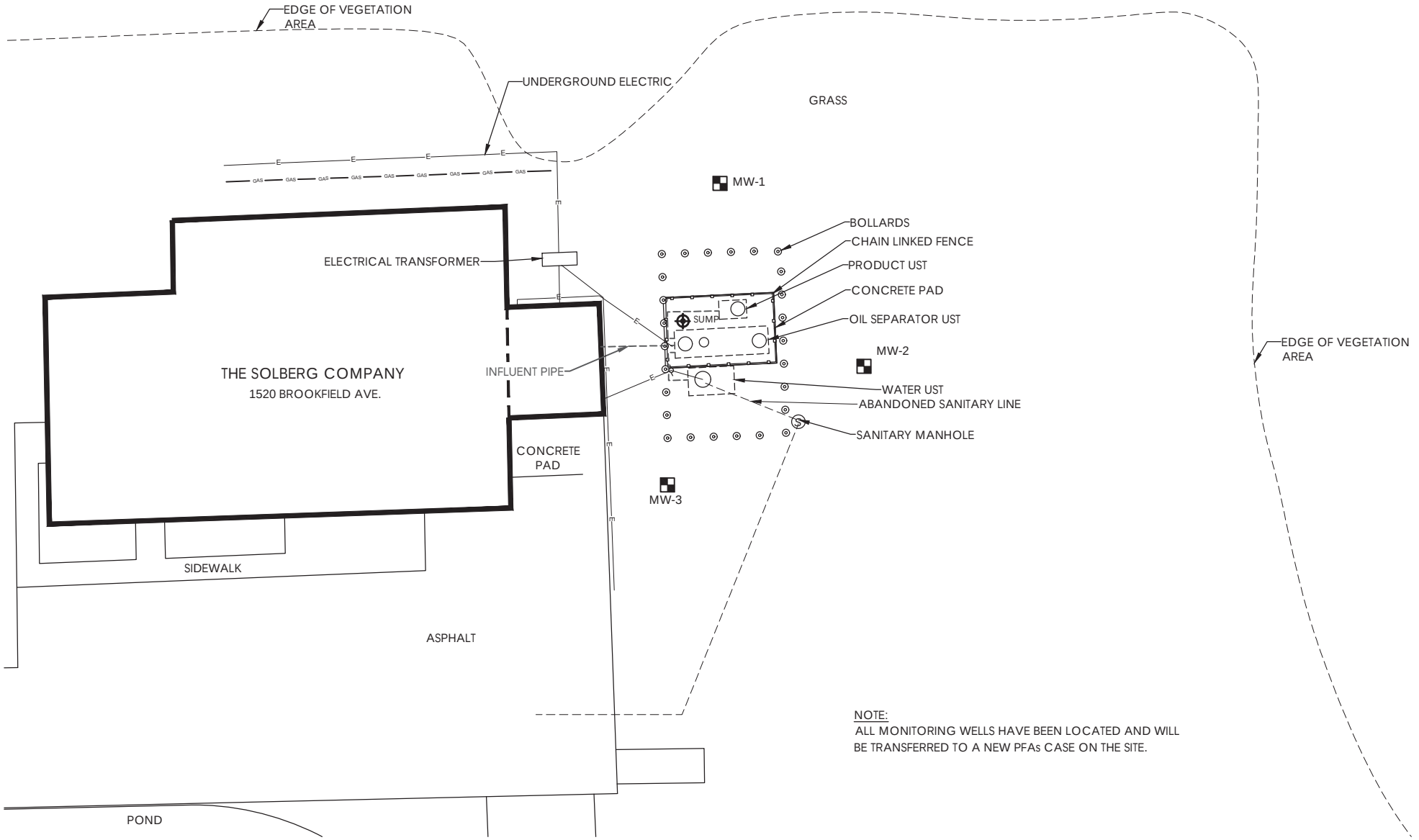
General Engineering Company

P.O. Box 340 • 916 Silver Lake Dr. • Portage, WI 53901
608-742-2169 (Office) • 608-742-2592 (Fax)
www.generalengineering.net

ISOCONCENTRATION MAP

THE SOLBERG COMPANY
1520 BROOKFIELD AVE.
VILLAGE OF HOWARD
BROWN COUNTY, WI

DRAWN BY	KSP
REVIEWED BY	LMB
ISSUE DATE	OCT. 2020
GEC FILE NO.	2-0919-397
SHEET NO.	B.3.b



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LEGEND

MW-2 MONITORING WELL

TANK SUMP

General Engineering Company

P.O. Box 340 • 916 Silver Lake Dr. • Portage, WI 53901

608-742-2169 (Office) • 608-742-2592 (Fax)

www.generalengineering.net

MONITORING WELLS

THE SOLBERG COMPANY
1520 BROOKFIELD AVE.
VILLAGE OF HOWARD
BROWN COUNTY, WI

DRAWN BY	KSP
REVIEWED BY	LMB
ISSUE DATE	OCT. 2020
GEC FILE NO.	2-0919-397
SHEET NO.	B.3.d

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

Case Closure

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.		
03-05-584180			
Parcel ID No.			
VH-3175			
FID No.	**WTM Coordinates**		
	X	Y	
405227020	674303	458545	
BRRTS Activity (Site) Name	**WTM Coordinates Represent:**		
The Solberg Company	☒ Source Area ☐ Parcel Center		
Site Address	**City**	**State**	**ZIP Code**
1520 Brookfield Avenue	Village of Howard	WI	54313
Acres Ready For Use			
10			

Responsible Party (RP) Name			
The Solberg Company (c/o Mitch Hubert)			
Company Name			
The Solberg Company			
Mailing Address	**City**	**State**	**ZIP Code**
1520 Brookfield Avenue	Village of Howard	WI	54313
Phone Number	**Email**		
(920) 593-9445	mitch.hubert@perimeter-solutions.com		

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

Environmental Consultant Name			
Beth Erdman			
Consulting Firm			
General Engineering Company			
Mailing Address	**City**	**State**	**ZIP Code**
916 Silver Lake Drive	Portage	WI	53901
Phone Number	**Email**		
(608) 742-2169	berdman@generalengineering.net		

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 $ $1,400.00

   ☐ 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 Site is an approximate 10-acre parcel of land (Parcel Number VH-3175) owned by Perimeter Solutions, LP (The Solberg Company). The Site is located on the east side of Brookfield Avenue, approximately 1/2 mile south of County Road M (Lineville Road) at 1520 Brookfield Avenue in the Village of Howard, Brown County, Wisconsin. The Site is located within the northwest 1/4 of the southeast 1/4 of Section 3, Township 24 North, Range 20 East.

B. Prior and current site usage: Specifically describe the current and historic occupancy and types of use.
The Site appears to have been utilized as agricultural land until at least 2010 and has since been developed with two buildings including an office/warehouse on the western portion of the Site, and a building utilized to perform fire suppression testing on the east central portion of the Site with a small attached mechanical building just east of the testing building. An approximate 2,000-gallon capacity gasoline underground storage tank (UST), an approximate 2,000-gallon water UST, and an underground oil/water separator tank system are located in an area approximately 10 feet east of the mechanical building.

C. Current zoning (e.g., industrial, commercial, residential) for the site and for neighboring properties, and how verified (Provide documentation in Attachment G).
The Site and the adjoining property to the north are zoned I-1 General Industrial. The adjoining property to the south is zoned I-3 Industrial Park-Light. The adjoining property to the east is zoned R-5 Rural Estate. The adjoining properties to the west, across Brookfield Avenue are zoned I-1 or R-5. Verification of zoning is provided in Attachment F.

D. Describe how and when site contamination was discovered.
The fire suppression testing building is used for fire suppression testing exercises which generate unused gasoline and fluids. The unused gasoline and fluids are collected in a drain piped below grade to the east of the building that flows into a below grade oil/water separator system. The oil/water separator system is comprised of three USTs including a central 3-section oil/water tank with weirs to separate petroleum products and water, a northern waste product collection tank, and a southern water storage tank. On March 18, 2019, the Wisconsin Department of Natural Resources (WDNR) was notified of a spill at the Site. The spill occurred when the sump pump used to remove high groundwater from an oil/water separator UST system failed during flooding of the entire eastern portion of the Site. As a result, the oil/water separator tank system subsequently failed, filled with water, and released an estimated 100 gallons of gasoline through the top man-way to the surface flood waters surrounding the UST system.

E. Describe the type(s) and source(s) or suspected source(s) of contamination.
Unleaded gasoline from the oil/water separator tank system failure.

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.
The Solberg Co. - Site 2-- 02-05-587486 Opened March 3, 2021

H. List BRRTS activity/site name(s) and number(s) for all properties immediately adjacent to (abutting) this source property.
Not Applicable-no BRRTS sites on adjacent properties

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.
The fill materials in the upper 12 to 18 inches were underlain by natural tan and brown silty fine sand to depths of 10 feet to 12.5 feet below ground surface (bgs). As exceptions, reddish brown silty clay soils were encountered at soil boring B-1 at depths of 8.5 to 10 feet bgs; at B-2 at depths of 1.5 feet to 2.5 feet bgs and 9 feet to 12.5 feet bgs; and soil boring B-3 at depths of 10 to 12.5 feet bgs. Brown sand was also encountered at soil boring B-2 at depths ranging from approximately 6.5 feet to 9 feet bgs.

ii. Describe the composition, location and lateral extent, and depth of fill or waste deposits on the site.
At soil borings B-1 to B-3, approximately 12 to 18 inches of topsoil or sand and gravel fill was observed.

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 performance of the site investigation activities. According to a review of the Bedrock Geologic Map of Wisconsin (Mudrey, M.G., et al., 1982), bedrock beneath the Site is described as Ordovician age dolomite with some limestone and shale of the Sinnipee Group and occurs within 50 feet 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).

The surface of the Site is relatively flat and topography regionally slopes down toward the east/southeast toward Lake Michigan, located approximately 1 mile southeast of the Site. The surface of the Site is covered primarily by grass, with asphalt and parking areas present south of the office building. An asphalt drive also extends from the parking area toward the east/northeast to the south side of the fire suppression testing building. A storm water detention pond is located along the southeastern end of the Site. Overgrown vegetation is present beyond the grass area on the far northern and eastern portions of the Site.

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 level measurements were performed at each of the monitoring wells during the well development/ groundwater sampling rounds on November 26, 2019, December 13, 2019, March 24, 2020, June 11, 2020, and October 12, 2020. The groundwater levels during the well development on November 26, 2019 did not appear to be static at MW-3, therefore, the levels during on that date are not discussed in this section. Static groundwater levels have ranged from 2.65 feet below top of casing (TOC) at MW-1 (EL. 587.98) on March 24, 2020, to 6.69 feet below TOC at MW-2 (EL. 584.15) on October 12, 2020. Groundwater was encountered primarily within silty fine sand and to a lesser extent silty clay and sand. Based on the low petroleum contaminant concentrations within groundwater, no piezometers were installed during the investigation.

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

Based on the groundwater elevation data, the groundwater flow appears to be variable. During the initial three sampling rounds, while the groundwater table was present at 2 to 3 feet below TOC, the groundwater flow direction appeared to be toward the southwest. During the most recent groundwater sampling round (October 12, 2020) when groundwater levels ranged from 6.22 feet below TOC to 6.69 feet below TOC, the groundwater flow direction appeared to be toward the northeast. Bedrock was not encountered during the investigation and fracture flow was not evaluated.

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

Due to the low levels of petroleum contamination detected in the monitoring wells, this information was not obtained.

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).

Since only low levels of petroleum contamination were identified below the Wisconsin Administrative Code NR 140 enforcement standard (ES) in the monitoring wells installed beyond the tank bed, no research was performed regarding potable or municipal wells within 1,200 feet of the Site.

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.

The scope of site investigation activities included the advancement of three soil borings, which were converted to monitoring wells. The scope of investigation activities also included surveying and well development of the monitoring wells, collection of soil samples from the soil borings, collection of four rounds of groundwater samples from the monitoring wells and a previously existing tank system sump, submittal of soil and groundwater samples for laboratory analysis, evaluation of the collected data and preparation of a Site Investigation Report.

A Status Update summarizing the preliminary site investigation activities was submitted to the WDNR on January, 8, 2020. A Status Update summarizing the second round of groundwater sampling was submitted to the WDNR on April 3, 2020. A Site Investigation Report was submitted to the WDNR on July 23, 2020. The fourth round of groundwater sampling was performed on October 12, 2020, subsequent to submittal of the Site Investigation Report.

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.

Petroleum contamination does not appear to extend beyond the property boundaries of the Site.

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.

There were no structural impediments to the completion of the remediation activities. The locations of utilities along the west end of the tank basin could not be accurately verified, therefore no soil borings were advanced along the western end of the tank bed.

B. Soil

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

The extent of soil contamination was evaluated by observing the distressed/burned vegetation resulting from the surface spill. Remedial excavation was performed in the areas of the distressed vegetation to depths of 12 inches and near the tank system to depths of 3 feet bgs. No detectable concentrations of petroleum volatile organic compounds (PVOCs) or naphthalene were identified in the 13 confirmation soil samples collected at the excavation limits (SS-1 to SS-13) with the exception of 1,3,5 trimethylbenzene detected at a concentration of 27.1J micrograms per kilogram (µg/kg) at SS-12 at a depth of 6-inches bgs. No detectable concentrations of PVOCs or naphthalene were detected in the soil samples collected from soil borings B-1 to B-3 at depths of 2.5 to 5 feet bgs. No below grade preferential pathways were identified during the excavation activities performed. Based on the results of the soil samples obtained at the Site, and remedial activities which removed contaminated soils from 12 inches to 3 feet bgs, there does not appear to be the potential for potential receptors or migration pathways to have been impacted by the surface spill at the Site.

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

The soil sample collected from the remedial excavation limits of the spill at SS-12 at a depth of 6-inches bgs reported 1,3,5 trimethylbenzene at a concentration of 27.1J µg/kg.

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 cleanup standards utilized for the Site were the Wisconsin Administrative Code (WAC), NR 720 soil to groundwater residual contaminant levels (RCLs) and direct contact RCLs for non-industrial sites. The standards were obtained from the WDNR RR Program Soil RCLs spreadsheet, which are derived from the US Environmental Protection Agency (EPA), Screening level web calculator.

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.

The groundwater contamination exceeding the WAC NR 140 ES appears to be confined to the area around the tank system. The initial groundwater sample collected from the UST backfill (GW UST) contained benzene (95 µg/L), naphthalene (186 J µg/L), toluene (1,380 µg/L), total trimethylbenzenes (1,066 µg/L) and total xylenes (3,210 µg/L), all exceeding their applicable WAC NR 140 ES. Groundwater samples collected from the sump during the initial three sampling rounds (subsequent to treatment of 40,000-gallons of contaminated groundwater) reported benzene concentrations ranging from 23.4 to 37 micrograms per liter (µg/L), which exceeded its WAC NR 140 ES of 5 µg/L and other PVOCs and naphthalene at concentrations exceeding their applicable WAC NR 140 preventive action limits (PAL). However, the groundwater sample collected from the sump during the most recent sampling round on October 12, 2020, did not report concentrations of PVOCs or naphthalene above their respective WAC NR 140 PALs. The groundwater samples collected from the monitoring wells did not report concentrations of PVOCs or naphthalene exceeding their respective standards with the exception of low concentrations of naphthalene or total trimethylbenzenes at monitoring well MW-1 and benzene at MW-1 and MW-2, exceeding their respective WAC NR 140 PALs. The residual groundwater contamination is associated with the sump pump failure and subsequent resulting surface spill. The low concentrations of PVOCs and naphthalene identified in the shallow groundwater remain within the Site boundaries and do not appear to extend appreciably beyond the tank system backfill. The highest concentrations in groundwater found in the grab groundwater sample, which was obtained in the test pit during the soil remediation, (GW UST) were not identified at thresholds that warrant a vapor investigation (e.g., benzene was identified at 95 µg/L, significantly lower than the 1,000 µg/L threshold). Accordingly, the residual low levels of PVOCs and naphthalene that will remain at the Site do not appear to pose a threat to building foundation drain systems or to surrounding water supply wells.

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.

The free product present as a result of the initial spill has been removed and was properly disposed of during the initial spill response. No residual free product remains within groundwater at the 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.

All impacted soils have been removed up to the building on the Site and groundwater has not been substantially impacted by the release. Therefore, the vapor pathway was not assessed during this investigation.

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

Not Applicable- no vapor assessment was necessary or performed.

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.

There was no indication that surface water or sediment within the Site pond was impacted by the initial spill. The petroleum contaminated soils have been removed and properly disposed of, so there is no potential for soil contamination to the Site pond or sediment from surface runoff from the spill. In addition, the groundwater plume (exceeding the WAC NR 140 ES) does not appear to extend appreciably beyond the current tank bed. Therefore, the surface water and sediment pathways were not assessed.

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

Not Applicable-see E.i

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.

Valley Environmental Response (VER) responded to the spill, surrounded the area impacted with gasoline around the UST system with petroleum absorbent boom and pom, and pumped the fluids remaining in the UST system into a frac tank. At that time, the use of the compromised UST system was discontinued until repairs could be made.

As the result of the very wet spring, multiple UST or UST backfill de-watering events were conducted to complete the system repairs, with water collected and containerized within on-site frac tanks during each event. Final repairs to the UST system and excavation of petroleum-impacted soils could not be completed until June 2019. On June 24th, the area around the UST system was de-watered into frac tanks and the final system repairs were made. In total, greater than 40,000-gallons of gasoline-impacted water were pumped into frac tanks and treated by a carbon filtration system.

Subsequent to the final UST system repairs, VER conducted the excavation of gasoline-impacted surface soils surrounding the UST system. On June 25th through 26th VER excavated approximately 133 tons of gasoline-impacted soil, and oversaw its disposal at Waste Management's Ridgeview landfill located in Whitelaw, Wisconsin. No preferential pathways were observed below grade during the remedial excavation activities.

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

Not Applicable-no immediate or interim actions were performed.

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.

The initial remedial activities at the Site consisted of surrounding the spill with petroleum absorbent boom and pom, and pumping the fluids remaining in the UST into a frac tank. Approximately 40,000-gallons of contaminated water was removed from the tank basin, pumped into frac tanks, treated by a carbon filtration system, and disposed of at Green Bay Metro Sewage District. In addition, a remedial soil excavation was performed in the area of the existing tanks, and extended west toward the building and along the distressed/burned grass to the northwest and southeast. The excavation was irregular in shape extending to a maximum length of approximately 180 feet northwest/southeast and widths ranging from 10 to 50 feet. The excavation was performed to depths of 3 feet bgs near the tank area and up to 12 inches in the areas where the spill migrated beyond the tanks.

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.

Not Applicable-a Green and Sustainable Remediation evaluation was not performed.

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.

There is no known soil remaining with residual petroleum contaminant concentrations exceeding the WAC NR 720 soil to groundwater RCLs. Within the area of the tank bed, benzene was present within groundwater at concentrations ranging

from 23.4 µg/L to 37 µg/L during the three initial groundwater sampling rounds, however PVOCs and naphthalene were not detected within the Sump sample above their respective WAC NR 140 PALs during the most recent sampling round, and were not found at concentrations greater than their respective PALs in the monitoring wells in all four sampling rounds. Based on the results of investigations performed at the Site, there does not appear to be a risk for vapor migration of the contaminants at the Site.

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.

There is no known soil contamination remaining within the upper four feet of soil with contamination concentrations exceeding the direct contact standards.

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.

There are no known soils above the low water table with PVOC or naphthalene concentrations exceeding the soil standards for the groundwater pathway.

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.

The residual groundwater contamination will be addressed by natural attenuation of the groundwater plume.

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).

The majority of the spilled gasoline, approximately 40,000-gallon of contaminated groundwater, and affected soils were removed during the spill response activities. Benzene was present within the tank basin sump at stable concentrations ranging from 23.4 to 37 µg/L during the first three sampling rounds. PVOCs or naphthalene were not detected within the most recent sample collected from the tank basin sump at concentrations above their respective PALs. To be conservative, it is assumed that there are still relatively low WAC NR 140 ES exceedances of benzene similar to those during the initial three sampling rounds. Further degradation of the groundwater appears highly unlikely, and natural attenuation appears to be an effective remedy for the residual groundwater contamination.

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

Based on the analytical results from soil samples collected during the remedial and site investigation activities, it appears that the extent of soil contamination has been defined and that soils impacted by the release have been removed and properly disposed.

It appears that pea gravel associated with the tank system contains groundwater with relatively low concentrations of benzene exceeding the WAC NR 140 ES. However, the contaminated groundwater does not appear to extend appreciably beyond the tank system backfill as no WAC NR 140 ES exceedances were observed during any of the sampling rounds performed at monitoring wells MW-1 to MW-3.

Based on a review of the WDNR vapor guidance document, it does not appear that a vapor investigation is warranted on the Site. No direct contact RCLs were exceeded in the soil samples collected from the upper four feet of soils and there were no obvious contaminated soils remaining within 5 feet of the existing building during the remedial excavation activities. Additionally, groundwater samples collected from the tank sump, located approximately 10 feet from the existing building (near the source of the release), reported benzene concentrations well below the 1,000 µg/L threshold.

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

Not Applicable-there is no remediation system on the Site

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.

Not Applicable - an exemption is not necessary

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.

Not Applicable - there is no vapor concern based on the residual concentrations

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.

Not Applicable - there is no surface water or sediment on the Site within the groundwater plume boundaries.

5. Continuing Obligations: Includes all affected properties and rights-of-way (ROWs). 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 (database fees will apply, 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.

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																			
B																			
C																			
D																			

Signatures and Findings for Closure Determination

This page has been updated as of February 2019 to comply with the requirements of Wis. Admin. Code ch. NR 712.

Check the correct box for this case closure request and complete the corresponding certification statement(s) listed below to demonstrate that the requirements of Wis. Admin. Code ch. NR 712 have been met. The responsibility for signing the certification may not be delegated per Wis. Admin. Code § NR 712.09 (1). Per Wis. Admin. Code § 712.05 (1), the work must be conducted or supervised by the person certifying.

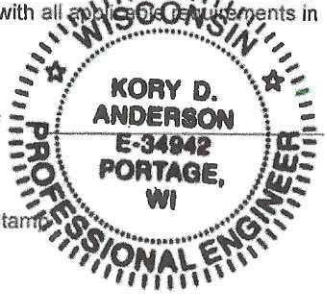
- (●) The investigation and/or response action(s) for this site evaluated and/or addressed groundwater (including natural attenuation remedies). Both a professional engineer and a hydrogeologist must sign this document per Wis. Admin. Code ch. NR 712.
- ( ) The investigation and the response action(s) for this site did not evaluate or address groundwater. A professional engineer must sign this document per Wis. Admin. Code ch. NR 712.

Engineering Certification

I, Kory D. Anderson, 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 document has been prepared in accordance with the Rules of Professional Conduct in ch. A-E 8, Wis. Adm. Code; and that, to the best of my knowledge, all information contained in this document is correct and the document was prepared in compliance with all applicable requirements in chs. NR 700 to 726, Wis. Adm. Code.

Signature Kory D. Anderson P. E. # E-34942

Title Vice President P.E. Stamp



Hydrogeologist Certification

I, Bernadette Greenwood, PG, hereby certify that I am a hydrogeologist as that term is defined in s. NR 712.03 (1), Wis. Adm. Code, am registered in accordance with the requirements of ch. GHSS 2, Wis. Adm. Code, or licensed in accordance with the requirements of ch. GHSS 3, Wis. Adm. Code, and that, to the best of my knowledge, all of the information contained in this document is correct and the document was prepared in compliance with all applicable requirements in chs. NR 700 to 726, Wis. Adm. Code.

Signature Bernadette Greenwood

Title Senior Project Geologist Date 04.05.2021

ATTACHMENT A

DATA TABLES

A.1. GROUNDWATER ANALYTICAL TABLE

SEE ATTACHED (4)

TABLE A.1
GROUNDWATER ANALYTICAL TABLE
THE SOLBERG COMPANY
1520 BROOKFIELD AVENUE, VILLAGE OF HOWARD, WISCONSIN

Monitoring Well	NR 140		Water Tank		Sump Above Oil Tank			FRAC 1				
Sampling Date	**ES**	**PAL**	**3/20/2019**	**5/31/2019**	**3/20/2019**	**4/8/2019**	**4/26/2019**	**4/8/2019**	**4/26/2019**	**5/14/2019**	**5/20/2019**	**5/31/2019**
PETROLEUM VOLATILE ORGANIC COMPOUNDS (PVOC) (µg/L)												
Benzene	5	0.5	**1510**	**160**	**2030**	**2540**	**560**	**1370**	**420**	**287**	**223**	**51**
Ethylbenzene	700	140	*400*	*650*	**1860**	**1950**	**850**	*690*	*174*	121	103	19.5
Methyl tert-butyl ether (MTBE)	60	12	<14	<28.5	<14	<28	<28	<14	<5.6	<28.5	<2.8	<5.7
Naphthalene	100	10	<105	**289**	**490**	**330 J**	<210	**144 J**	*45 J*	<85	<21	<17
Toluene	800	160	**4800**	**3600**	**13500**	**16800**	**7500**	**6100**	**1600**	**1120**	**940**	*187*
1,2,4-Trimethylbenzene	480	96	*276*	**1240**	**2100**	**1540**	**770**	**710**	*176*	*118*	*95*	26.2
1,3,5-Trimethylbenzene			*67 J*	**330**	**4600**	**340**	**182 J**	**161**	*41*	*<37.5*	*21.8*	9.6J
m&p-Xylene	2000	400	**1470**	**3600**	**6900**	**7300**	**3800**	**2700**	*650*	*460*	*390*	80
o-Xylene			**710**	**1930**	**3600**	**3500**	**1900**	**1400**	*340*	*252*	*194*	48

NE = NR 140 Standard Not Established
J = Analyte detected above laboratory limit of detection but below limit of quantitation.
D = Result not applicable due to sample dilution
Bold indicates analytical results above NR 140 ES
Italics indicates analytical results above NR 140 PAL
NA= Parameter not analyzed
µg/L=micrograms per liter

TABLE A.1 (Continued)
GROUNDWATER ANALYTICAL TABLE
THE SOLBERG COMPANY
1520 BROOKFIELD AVENUE, VILLAGE OF HOWARD, WISCONSIN

Monitoring Well	NR 140		FRAC 2					FRAC 3	FRAC 4			
Sampling Date	ES	PAL	5/31/2019	6/14/2019	6/24/2019	7/8/2019	7/23/2019	5/31/2019	7/8/2019	8/16/2019	9/5/2019	9/30/2019
PETROLEUM VOLATILE ORGANIC COMPOUNDS (PVOC) (µg/L)												
Benzene	5	0.5	**134**	**203**	**111**	**85**	**47**	**10.7**	**850**	**450**	**330**	**93**
Ethylbenzene	700	140	0.71 J	32	13.3	12.3	8.4	2.12	*660*	*205*	*159*	83
Methyl tert-butyl ether (MTBE)	60	12	<0.57	<2.8	<2.8	<2.8	<0.28	<0.57	<28	<24	<12	<28
Naphthalene	100	10	*32*	*22.1 J*	<21	<21	5.0J	4.6 J	**239J**	<130	<65	<210
Toluene	800	160	**1240**	**940**	*430*	*380*	*188*	79	**4600**	**1240**	**960**	*380*
1,2,4-Trimethylbenzene	480	96	*247*	*166*	*50*	53	32	6.5	**1130**	**470**	*256*	*92J*
1,3,5-Trimethylbenzene			*91*	*71*	14.2J	20.6	13.9	9.5	**289**	**157J**	*105J*	*<63*
m&p-Xylene	2000	400	*1100*	*700*	*281*	*273*	*160*	30.7	**2770**	*820*	*680*	*277*
o-Xylene			*690*	*450*	*200*	*186*	*109*	40	**1390**	*410*	*298*	*147*

NE = NR 140 Standard Not Established
J = Analyte detected above laboratory limit of detection but below limit of quantitation.
D = Result not applicable due to sample dilution
Bold indicates analytical results above NR 140 ES
Italics indicates analytical results above NR 140 PAL
NA= Parameter not analyzed
µg/L=micrograms per liter

TABLE A.1 (Continued)
GROUNDWATER ANALYTICAL TABLE
THE SOLBERG COMPANY
1520 BROOKFIELD AVENUE, VILLAGE OF HOWARD, WISCONSIN

Monitoring Well	NR 140		GW-1	GW-2	GW-3	GW UST	MW-1			
Sampling Date	**ES**	**PAL**	**6/27/2019**	**6/26/2019**	**6/27/2019**	**6/26/2019**	**12/13/2019**	**3/24/2020**	**6/11/2020**	**10/12/2020**
PETROLEUM VOLATILE ORGANIC COMPOUNDS (PVOC) (µg/L)										
Benzene	5	0.5	<0.32	<0.32	<0.32	**95**	*1.54*	*0.88J*	*0.77J*	*2.25*
Ethylbenzene	700	140	<0.29	<0.29	<0.29	*305*	<0.29	<0.55	<0.55	102
Methyl tert-butyl ether	60	12	<0.24	<0.24	<0.24	<12	<0.24	<0.71	<0.71	<0.47
Naphthalene	100	10	<1.3	<1.3	<1.3	**186J**	<1.3	NA	NA	*11.4*
Toluene	800	160	<0.29	<0.29	<0.29	**1380**	<0.29	<0.62	<0.62	3.8
1,2,4 -Trimethylbenzene	480	96	<0.46	<0.46	<0.46	**840**	<0.46	<0.71	<0.71	*118*
1,3,5 -Trimethylbenzene			<0.67	<0.67	<0.67	**226**	<0.67	<0.66	<0.66	*14.6*
Xylenes, -m, -p	2,000	400	<1.22	<1.22	<1.22	**3210**	<1.22	<2.04	<2.04	80.5
Xylenes, -o										

ES = Enforcement Standard
PAL = Preventive Action Limit
µg/L = micrograms per liter
NA = Parameter not analyzed
NE = NR 140 ES not established
J = Analyte detected above laboratory limit of detection but below limit of quantitation.
Bold indicates analytical results above NR 140 ES
Italic indicated analytical results above NR 140 PAL

TABLE A.1 (Continued)
GROUNDWATER ANALYTICAL TABLE
THE SOLBERG COMPANY
1520 BROOKFIELD AVENUE, VILLAGE OF HOWARD, WISCONSIN

Monitoring Well	NR 140		MW-2				MW-3				SUMP			
Sampling Date	ES	PAL	12/13/2019	3/24/2020	6/11/2020	10/12/2020	12/13/2019	3/24/2020	6/11/2020	10/12/2020	12/13/2019	3/24/2020	6/11/2020	10/12/2020
PETROLEUM VOLATILE ORGANIC COMPOUNDS (PVOC) (µg/L)														
Benzene	5	0.5	<0.32	<0.48	<0.48	*2.27*	<0.32	<0.48	<0.48	<0.33	**23.4**	**37**	**37**	<0.33
Ethylbenzene	700	140	<0.29	<0.55	<0.55	51	<0.29	<0.55	<0.55	<0.32	35	45	131	8.6
Methyl tert-butyl ether	60	12	<0.24	<0.71	<0.71	<0.47	<0.24	<0.71	<0.71	<0.47	<2.4	<0.71	<0.71	<0.47
Naphthalene	100	10	<1.3	NA	NA	1.95J	<1.3	NA	NA	<1.1	*15.8J*	*26.6*	*34*	3.07J
Toluene	800	160	<0.29	<0.62	<0.62	<0.26	0.46J	<0.62	<0.62	<0.26	6.8J	3.7	29.2	<0.26
1,2,4 -Trimethylbenzene	480	96	<0.46	<0.71	<0.71	0.96	<0.46	<0.71	<0.71	<0.3	*133*	*210*	*350*	25.5
1,3,5 -Trimethylbenzene			<0.67	<0.66	<0.66	<0.32	<0.67	<0.66	<0.66	<0.32	*23*	*51*	*88*	3.2
Xylenes, -m, -p	2,000	400	<1.22	<2.04	<2.04	<1.48	<1.22	<2.04	<2.04	<1.48	101.1	72	297	13.04
Xylenes, -o														

ES = Enforcement Standard
PAL = Preventive Action Limit
µg/L = micrograms per liter
NA = Parameter not analyzed
NE = NR 140 ES not established
J = Analyte detected above laboratory limit of detection but below limit of quantitation.
Bold indicates analytical results above NR 140 ES
Italic indicated analytical results above NR 140 PAL

A.2.SOIL ANALYTICAL RESULTS TABLE

SEE ATTACHED (2)

TABLE A.2
SOIL ANALYTICAL RESULTS
THE SOLBERG COMPANY
1520 BROOKFIELD AVENUE, VILLAGE OF HOWARD, WISCONSIN

Sample No.	WDNR Industrial Direct Contact RCL	WDNR Non-Industrial Direct Contact RCL	WDNR Soil to Groundwater RCL	SS-1	SS-2	SS-3	SS-4	SS-5	SS-6	SS-7	SS-8	SS-9	SS-10	SS-11	SS-12	SS-13
Sampling Date				6/25/2019	6/25/2019	6/25/2019	6/25/2019	6/25/2019	6/25/2019	6/25/2019	6/25/2019	6/25/2019	6/25/2019	6/26/2019	6/26/2019	6/26/2019
Sample Depth (feet)				6 inches	6 inches	6 inches	6 inches	6 inches	6 inches	6 inches	8 inches	4 inches	4 inches	6 inches	6 inches	8 inches
Saturated/Unsaturated				US	US	US	US	US	US	US	US	US	US	US	US	US
VOLATILE ORGANIC COMPOUNDS (VOCs) (µg/kg)																
Benzene	7,070	1,600	5.1	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25
Ethylbenzene	35,400	8,020	1,570	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25
Methyl tert-butyl ether	282,000	63,800	27	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25
Naphthalene	24,100	5,520	658.2	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25
Toluene	818,000	818,000	1,107.20	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25
1,2,4-Trimethylbenzene	219,000	219,000	1,378.70	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25
1,3,5-Trimethylbenzene	182,000	182,000		<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	27.1 J	<25
Xylenes, -m, -p	260,000	260,000	3,960	<50	<50	<50	<50	<50	<50	<50	<50	<50	<50	<50	<50	<50
Xylenes, -o				<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25

J = Analyte detected above laboratory limit of detection but below limit of quantitation.
Bold indicates analytical results exceed NR 720 RCL
RCL = Residual Contaminant Level
DCL = Direct-Contact Levels
NA = Parameter not analyzed
NE = NR 720 RCL not established

TABLE A.2 (CONTINUED)
SOIL ANALYTICAL RESULTS
THE SOLBERG COMPANY
1520 BROOKFIELD AVENUE, VILLAGE OF HOWARD, WISCONSIN

Sample No.	Non Cancer RCL Non-Industrial	Cancer RCL Non-Industrial	WDNR Non-Industrial Direct Contact RCL	WDNR Soil to Groundwater RCL	B-1	B-2	B-3
Sampling Date					11/19/2019	11/19/2019	11/19/2019
Sample Depth (feet)					2.5-5 (U/S)	2.5-5 (U/S)	2.5-5 (U/S)
PETROLEUM VOLATILE ORGANIC COMPOUNDS (PVOCs) (µg/kg)							
Benzene	106,000	1,600	1,600	5.1	<25	<25	<25
Ethylbenzene	4,080,000	8,020	8,020	1,570	<25	<25	<25
Methyl tert-butyl ether	22,100,000	63,800	63,800	27	<25	<25	<25
Naphthalene	178,000	5,520	5,520	658.2	<25	<25	<25
Toluene	5,240,000	NE	818,000	1,107.2	<25	<25	<25
1,2,4-Trimethylbenzene	373,000	NE	219,000	1,378.7	<25	<25	<25
1,3,5-Trimethylbenzene	339,000	NE	182,000		<25	<25	<25
Xylenes, -m, -p	818,000	NE	260,000	3,960	<75	<75	<75
Xylenes, -o							

J = Analyte detected above laboratory limit of detection but below limit of quantitation.
Bold indicates analytical results exceed NR 720 RCL
Italic indicates analytical results exceeds Direct Contact RCL
S=Saturated U=Unsaturated
RCL = Residual Contaminant Level
NE = NR 720 RCL not established

A.3. RESIDUAL SOIL CONTAMINATION TABLE

NOT APPLICABLE - THERE IS NO RESIDUAL SOIL CONTAMINATION EXCEEDING THE WAC NR 720 RCLS

A.4. VAPOR ANALYTICAL TABLE

NOT APPLICABLE – NONE OF THE CRITERIA FOR PERFORMING VAPOR TESTING WERE MET, THEREFORE VAPOR TESTING WAS NOT PERFORMED DURING THIS INVESTIGATION.

A.5.OTHER MEDIA OF CONCERN

NOT APPLICABLE – NO OTHER MEDIA OF CONCERN

A.6.WATER LEVEL ELEVATIONS

SEE ATTACHED TABLE (1)

TABLE A.6
WATER LEVEL ELEVATIONS
THE SOLBERG COMPANY
1520 BROOKFIELD AVENUE, VILLAGE OF HOWARD, WISCONSIN

Monitoring Well Number	Top of Well Casing Elevation (MSL)	Ground Surface Elevation (MSL)	Screened Interval Elevation (MSL)	Date Measured	Depth To Water Below Top Of Casing (Ft.)	Groundwater Elevation (Ft.) (MSL)
MW-1	590.63	588.80	585.58 575.58	11/26/2019	2.61	588.02
				12/13/2019	2.70	587.93
				3/24/2020	2.65	587.98
				6/11/2020	2.68	587.95
				10/12/2020	6.48	584.15
MW-2	590.84	588.96	585.79 575.79	11/26/2019	3.01	587.83
				12/13/2019	3.03	587.81
				3/24/2020	3.00	587.84
				6/11/2020	3.06	587.78
				10/12/2020	6.69	584.15
MW-3	590.88	588.95	585.83 575.83	11/26/2019	6.97	583.91
				12/13/2019	3.52	587.36
				3/24/2020	3.24	587.64
				6/11/2020	3.48	587.40
				10/12/2020	6.22	584.66

Elevations are referenced to Mean Sea Level (MSL).

ft = feet

Water Level at MW-3 on 11/26/2019 is not a static water level

A.7.OTHER

NOT APPLICABLE

ATTACHMENT B

MAPS, FIGURES AND PHOTOS

B.1. LOCATION MAPS

SEE ATTACHMENTS

B.1.a. LOCATION MAP

SEE ATTACHED (1)

B.1.a Location Map

Legend

- Open Site
- Closed Site
- Continuing Obligations Apply
- Facility-wide Site

0.2 0 0.2 Miles

1: 7,920

NAD_1983_HARN_Wisconsin_TM

DISCLAIMER: The information shown on these maps has been obtained from various sources, and are of varying age, reliability and resolution. These maps are not intended to be used for navigation, nor are these maps an authoritative source of information about legal land ownership or public access. No warranty, expressed or implied, is made aregarding accuracy, applicability for a particular use, completemenss, or legality of the information depicted on this map. For more information, see the DNR Legal Notices web page: http://dnr.wi.gov/org/legal/

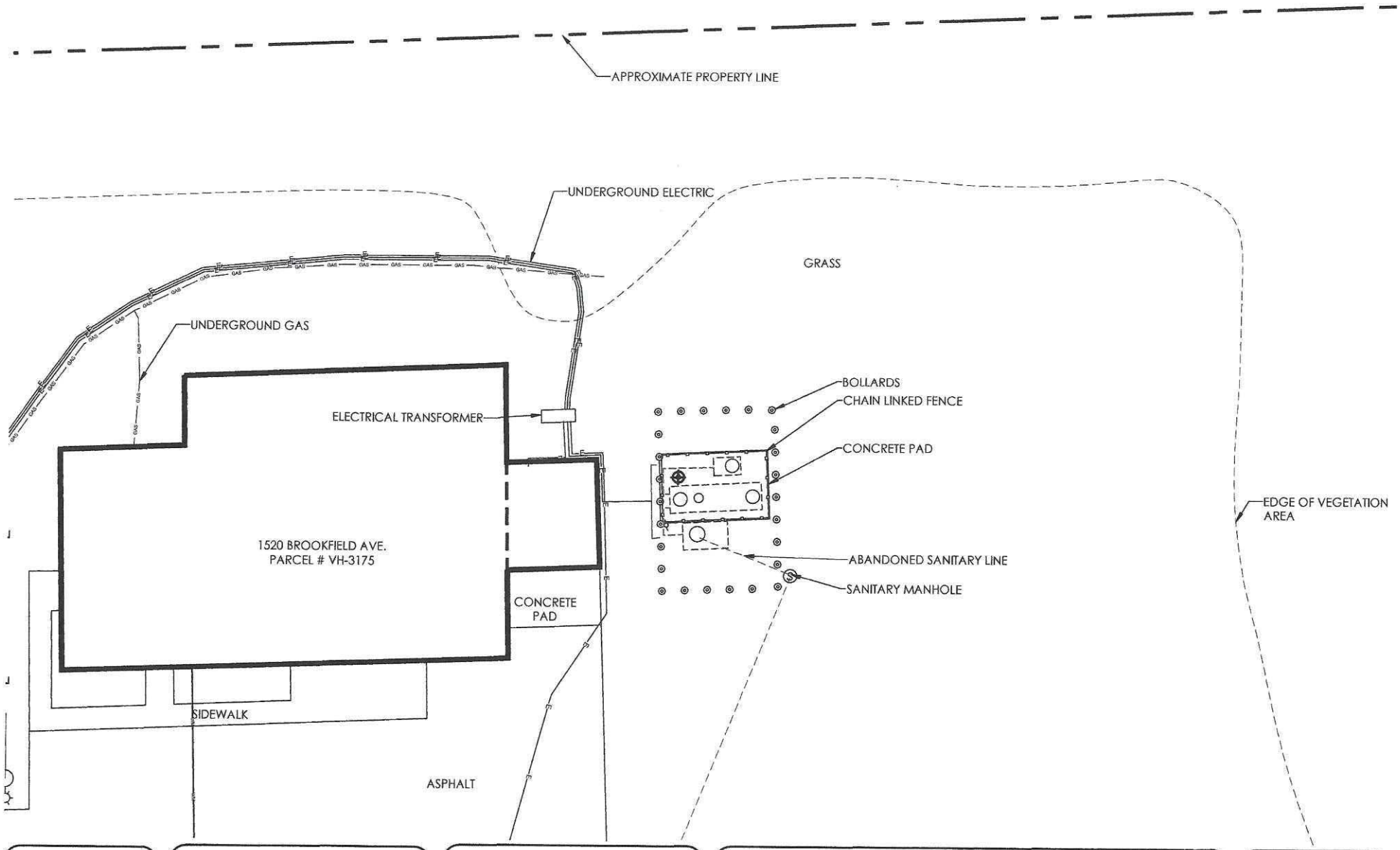
Note: Not all sites are mapped.

Notes

The Solberg Company
1520 Brookfield Avenue
Village of Howard, Wisconsin 54313

B.1.b. DETAILED SITE MAP

SEE ATTACHED (1)



N
W E
S
0 30'
15'

LEGEND

MW-2 MONITORING WELL

TANK SUMP

General Engineering Company

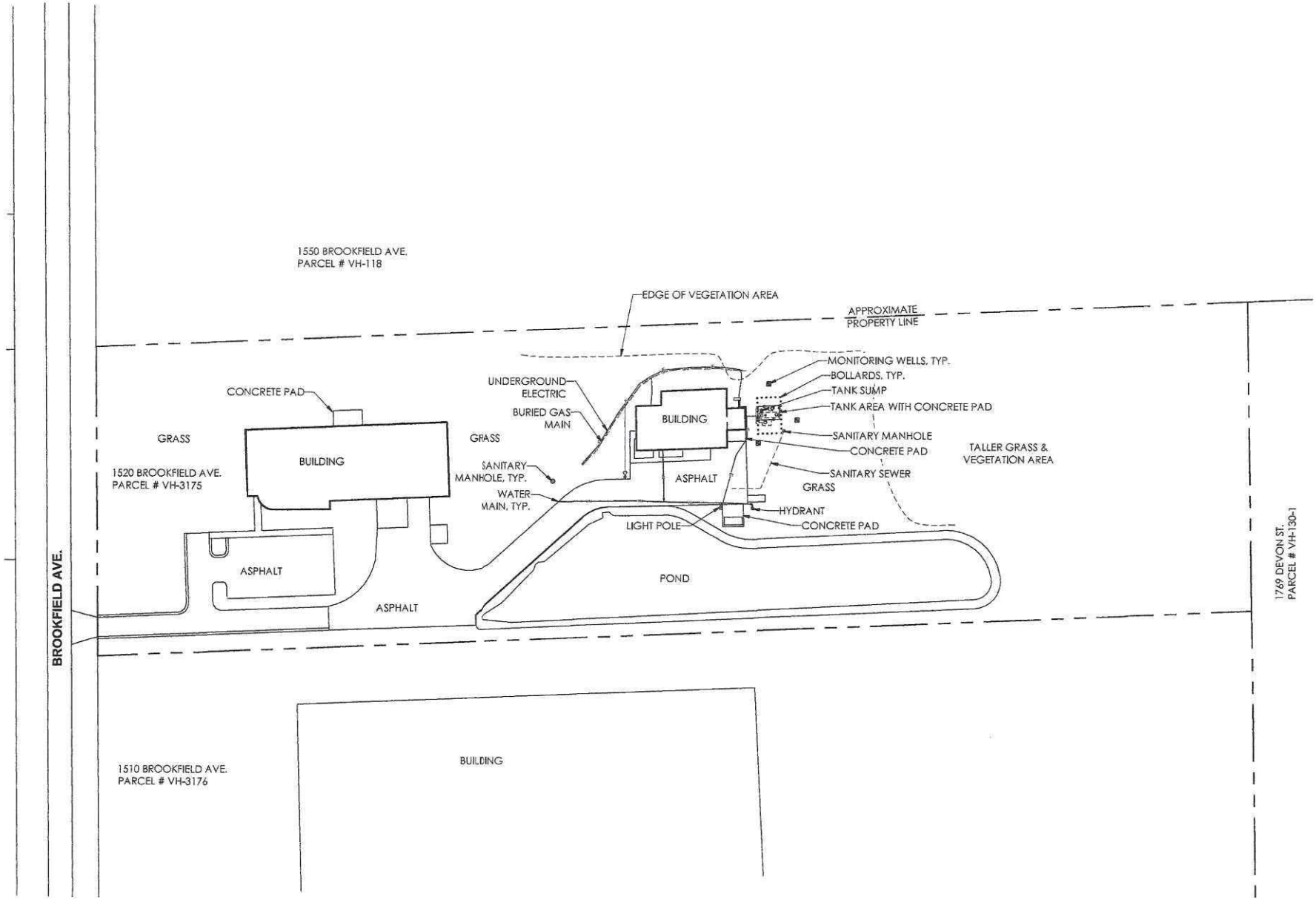
P.O. Box 340 • 916 Silver Lake Dr. • Portage, WI 53901
608-742-2169 (Office) • 608-742-2592 (Fax)
www.generalengineering.net

DETAILED SITE PLAN

THE SOLBERG COMPANY
1520 BROOKFIELD AVE.
VILLAGE OF HOWARD
BROWN COUNTY, WI

GEC

DRAWN BY	KSP
REVIEWED BY	LMB
ISSUE DATE	OCT. 2020
GEC FILE NO.	2-0919-397
SHEET NO.	B.1.b.1



General Engineering Company
P.O. Box 340 • 919 Silver Lake Dr. • Portage, WI 53901
608-742-2169 (Office) • 608-742-2592 (Fax)
www.generalengineering.net

FULL DETAILED SITE PLAN
THE SOLBERG COMPANY
1520 BROOKFIELD AVE
VILLAGE OF HOWARD
BROWN COUNTY, WI

REVISIONS	NO.	BY	DATE

N
W E
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0 100
SCALE

DRAWN BY	KSP
REVIEWED BY	BLY
ISSUE DATE	JUNE 2021
GEC FILE NO.	2-0919-397
SHEET NO.	B.1.b.2

B.1.c. RR SITES MAP

SEE ATTACHED (1)

B.1.c RR Sites Map

Legend

- Open Site
- Closed Site
- Continuing Obligations Apply
- Facility-wide Site

0.2 0 0.2 Miles

1: 7,920

NAD_1983_HARN_Wisconsin_TM

Note: Not all sites are mapped.

Notes

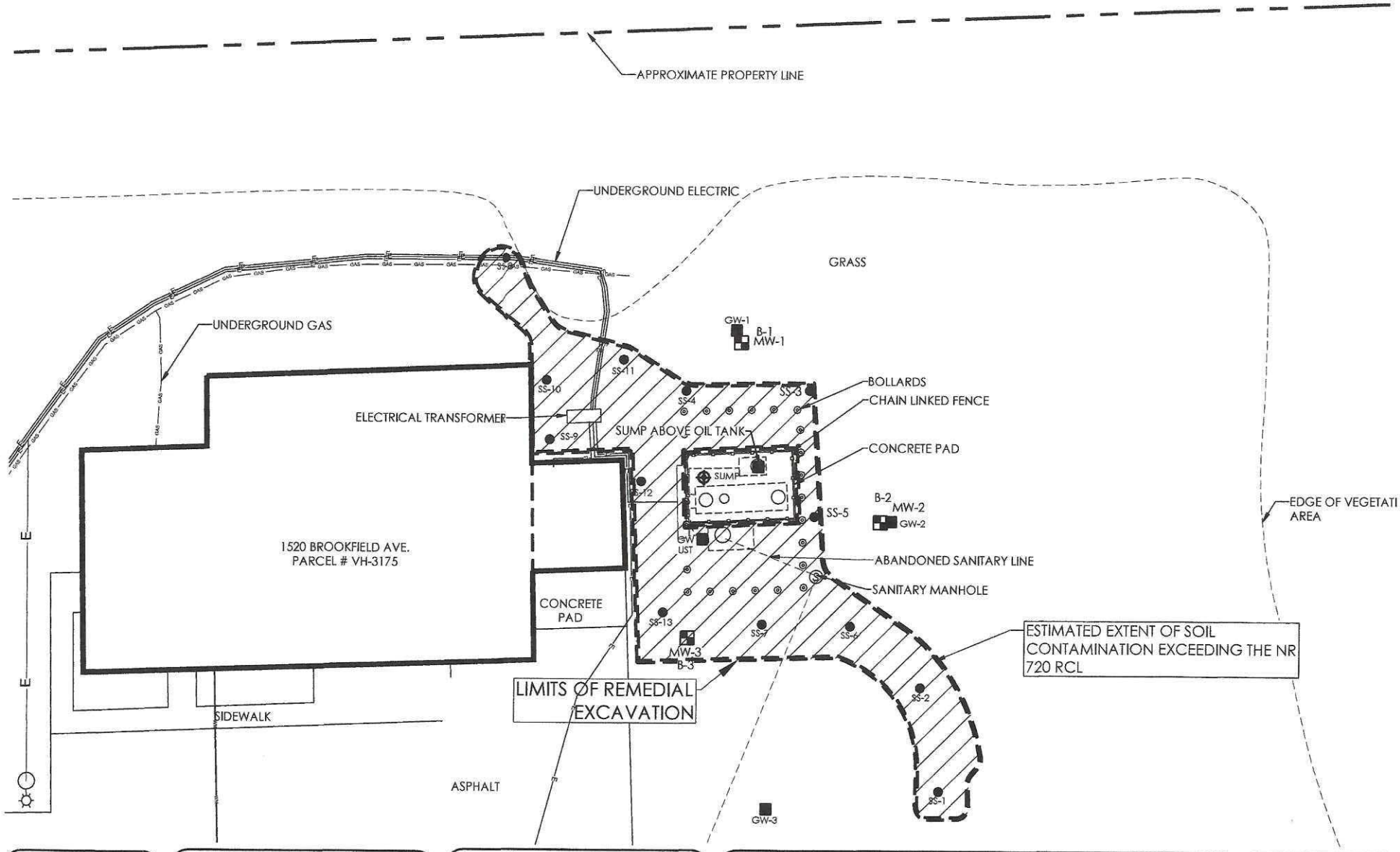
The Solberg Company
1520 Brookfield Avenue
Village of Howard, Wisconsin 54313

B.2. SOIL FIGURES

SEE ATTACHMENTS

B.2.a.SOIL CONTAMINATION

SEE ATTACHED (1)



N
W E
S
0 30'
15'

LEGEND

- LIMITS OF REMEDIAL EXCAVATION
- MW-2 / B-2 SOIL BORING & MONITORING WELL
- TANK SUMP
- GW-3 TEST PIT GROUNDWATER SAMPLE
- SB-8 SOIL SAMPLE WITH CONCENTRATIONS BELOW THE NR 720 SOIL TO GROUNDWATER RCLs

General Engineering Company

P.O. Box 340 • 916 Silver Lake Dr. • Portage, WI 53901
608-742-2169 (Office) • 608-742-2592 (Fax)
www.generalengineering.net

SOIL CONTAMINATION

THE SOLBERG COMPANY
1520 BROOKFIELD AVE.
VILLAGE OF HOWARD
BROWN COUNTY, WI

DRAWN BY	KSP
REVIEWED BY	LMB
ISSUE DATE	OCT. 2020
GEC FILE NO.	2-0919-397
SHEET NO.	B.2.a

B.2.b. RESIDUAL SOIL CONTAMINATION

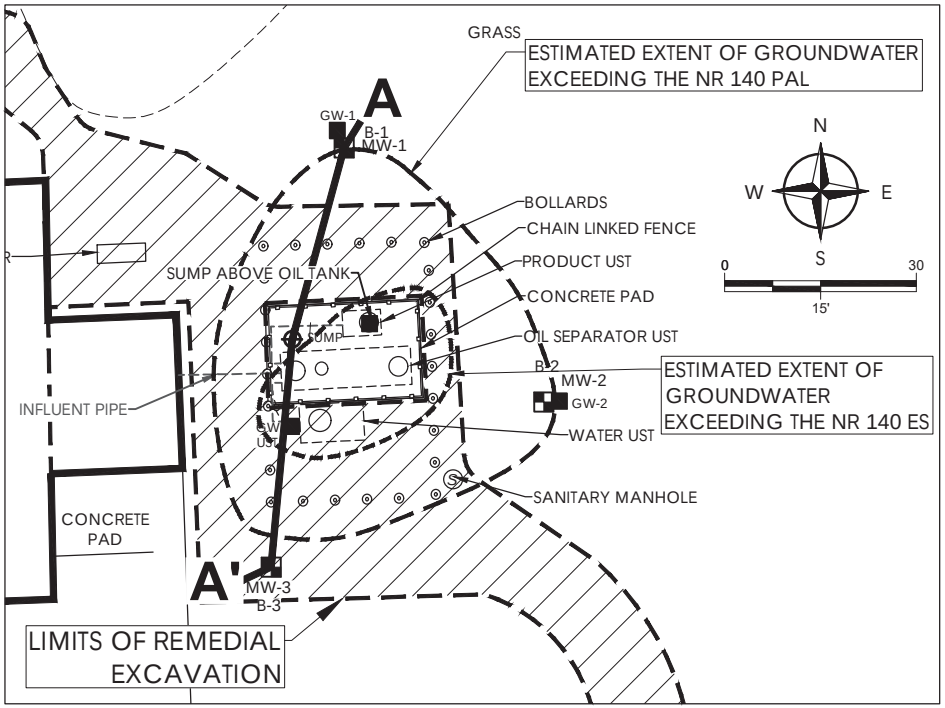
NOT APPLICABLE-SOIL CONTAMINATION WAS REMOVED DURING THE PERFORMANCE OF A REMEDIAL EXCAVATION

B.3. GROUNDWATER FIGURES

SEE ATTACHMENTS

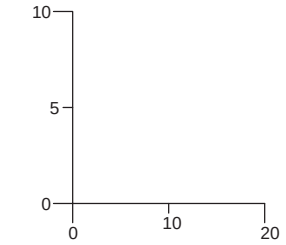
B.3.a. GEOLOGIC CROSS SECTION FIGURE

SEE ATTACHED (1)

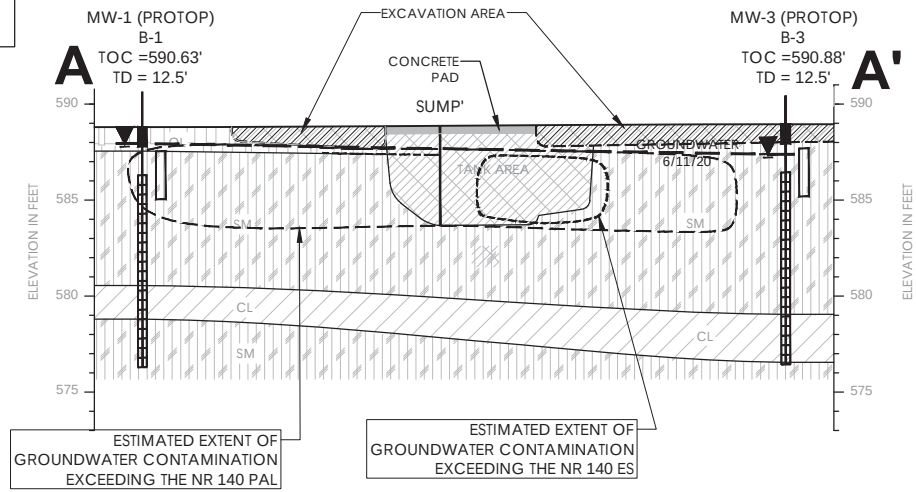


EXPLANATION

MONITORING WELL	SOIL DESCRIPTION
TOC - TOP OF WELL CASING MONITORING WELL SOIL SAMPLE LOCATION SOIL SAMPLE EXCEEDING NR 720 RCL GROUNDWATER ELEVATIONS (6/11/2020) MONITORING WELL SCREEN TD - TOTAL DEPTH OF BORING	FILL — See Soil Boring Logs OL — Organic silts, sand silt and organic silt-clay mixtures of low plasticity. SM — Silty sands, sand-silt mixtures CL — Inorganic clays of low to medium plasticity, gravelly clays, sandy clays, silty clays, lean clays



SCALE:
VERTICAL 1" = 10'
HORIZONTAL 1" = 20'



LEGEND

MW-2 / B-2 — SOIL BORING & MONITORING WELL

TANK SUMP

GW-3 — TEST PIT GROUNDWATER SAMPLE

General Engineering Company

P.O. Box 340 • 916 Silver Lake Dr. • Portage, WI 53901
608-742-2169 (Office) • 608-742-2592 (Fax)
www.generalengineering.net

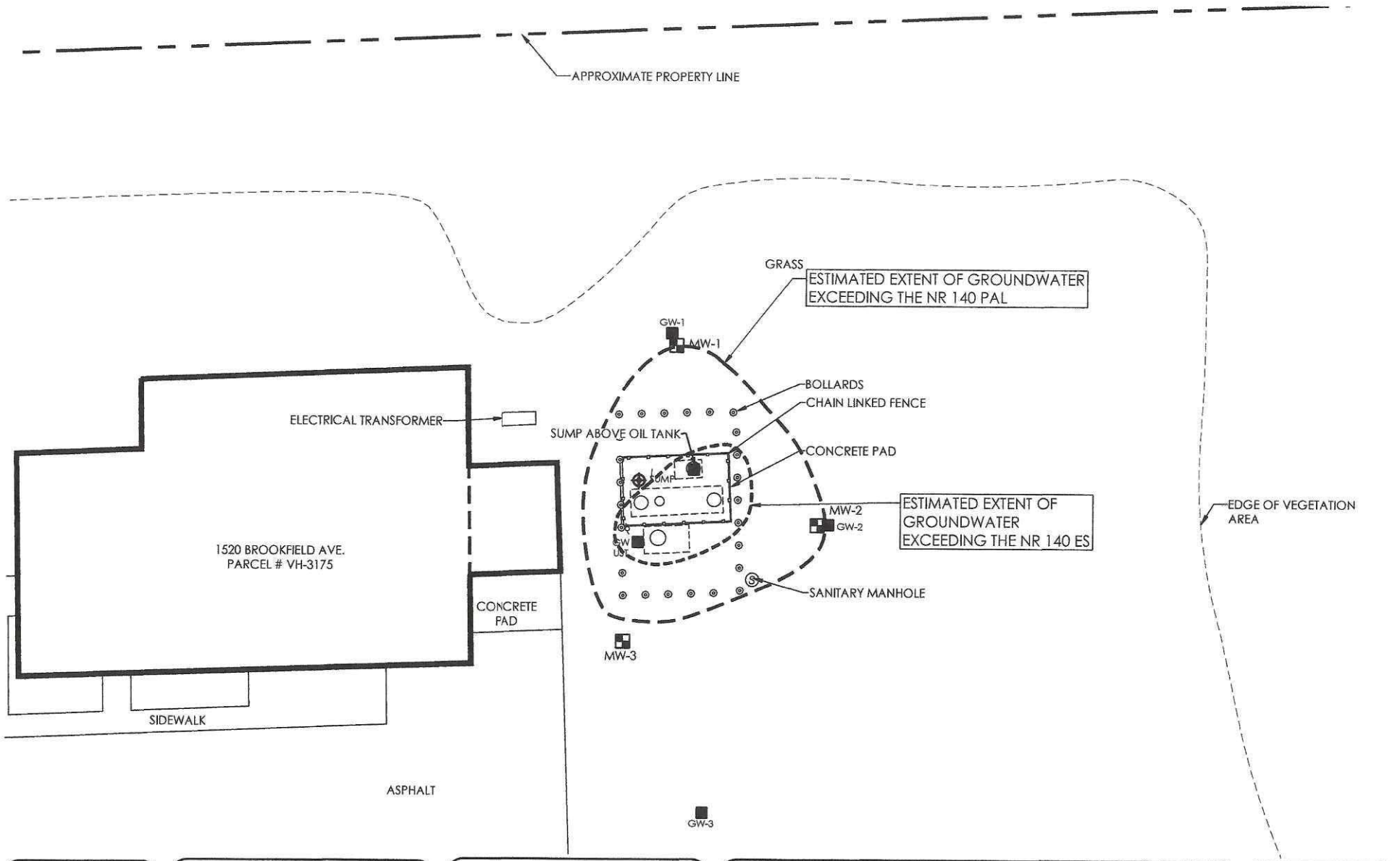
GEOLOGIC CROSS-SECTION A-A'

THE SOLBERG COMPANY
1520 BROOKFIELD AVE.
VILLAGE OF HOWARD
BROWN COUNTY, WI

DRAWN BY	KSP
REVIEWED BY	LMB
ISSUE DATE	OCT. 2020
GEC FILE NO.	2-0919-397
SHEET NO.	B.3.a

B.3.b. GROUNDWATER ISOCONCENTRATION

SEE ATTACHED (1)



General Engineering Company

P.O. Box 340 • 916 Silver Lake Dr. • Portage, WI 53901
608-742-2169 (Office) • 608-742-2592 (Fax)
www.generalengineering.net

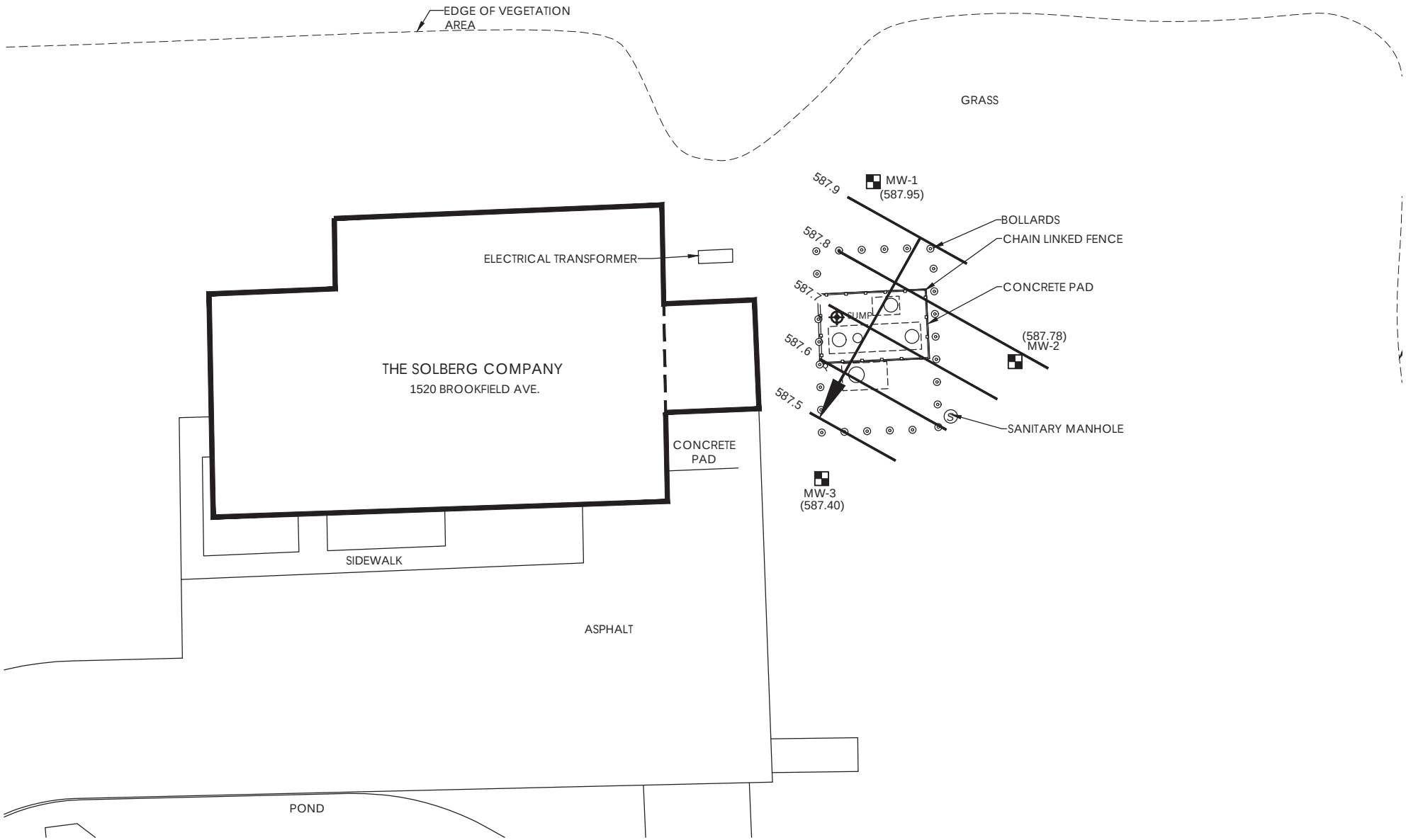
ISOCONCENTRATION MAP

THE SOLBERG COMPANY
1520 BROOKFIELD AVE.
VILLAGE OF HOWARD
BROWN COUNTY, WI

DRAWN BY	KSP
REVIEWED BY	LMB
ISSUE DATE	OCT. 2020
GEC FILE NO.	2-0919-397
SHEET NO.	B.3.b

B.3.c. GROUNDWATER FLOW DIRECTION

SEE ATTACHED (1)



N
W E
S
0 30'
15'

LEGEND

MW-2 MONITORING WELL

TANK SUMP

General Engineering Company

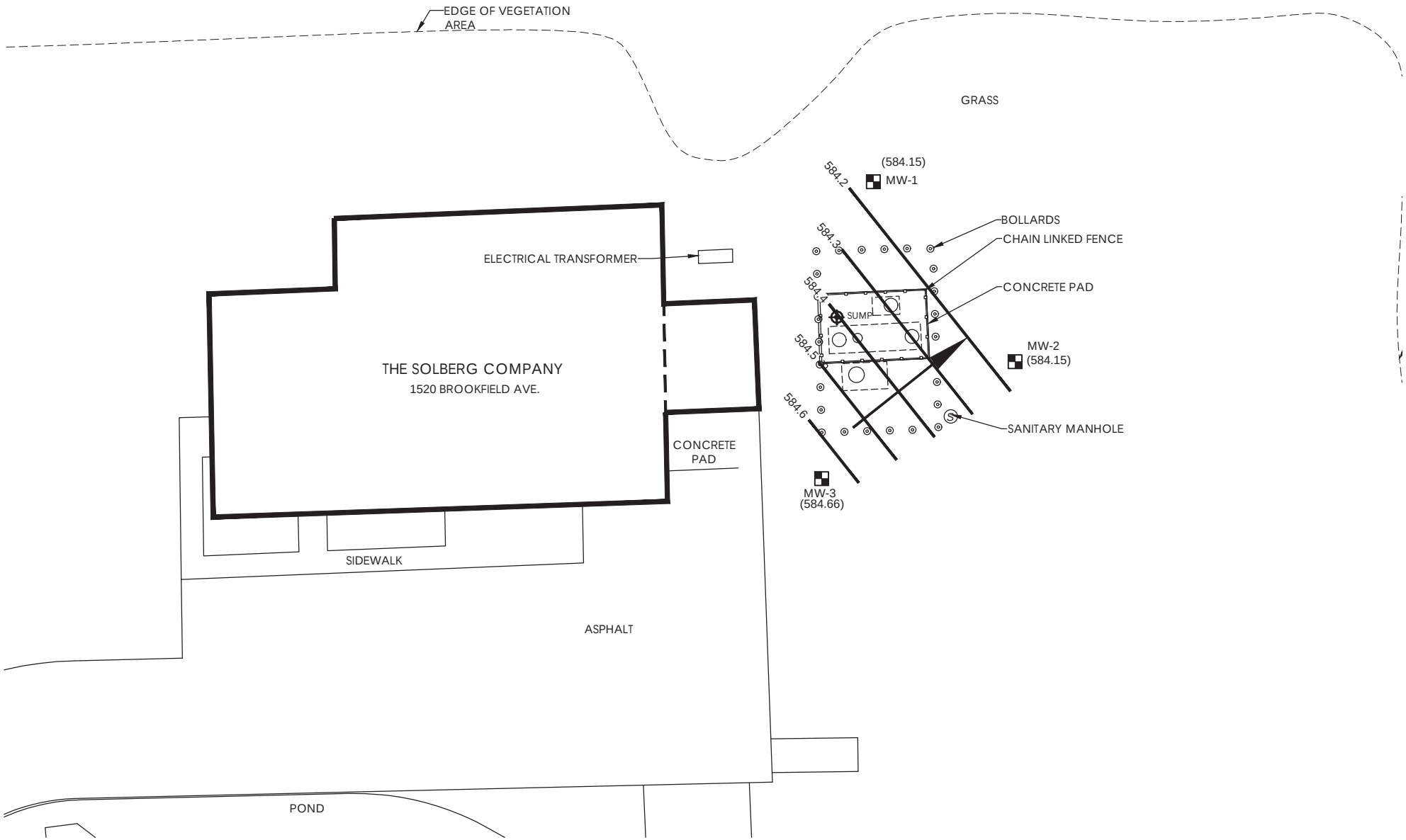
P.O. Box 340 • 916 Silver Lake Dr. • Portage, WI 53901

608-742-2169 (Office) • 608-742-2592 (Fax)

www.generalengineering.net

GROUNDWATER FLOW DIRECTION
JUNE 11, 2020
THE SOLBERG COMPANY
1520 BROOKFIELD AVE.
VILLAGE OF HOWARD
BROWN COUNTY, WI

DRAWN BY	KSP
REVIEWED BY	LMB
ISSUE DATE	OCT. 2020
GEC FILE NO.	2-0919-397
SHEET NO.	B.3.c.1



N
W E
S
0 30'
15'

LEGEND

MW-2 MONITORING WELL

TANK SUMP

General Engineering Company

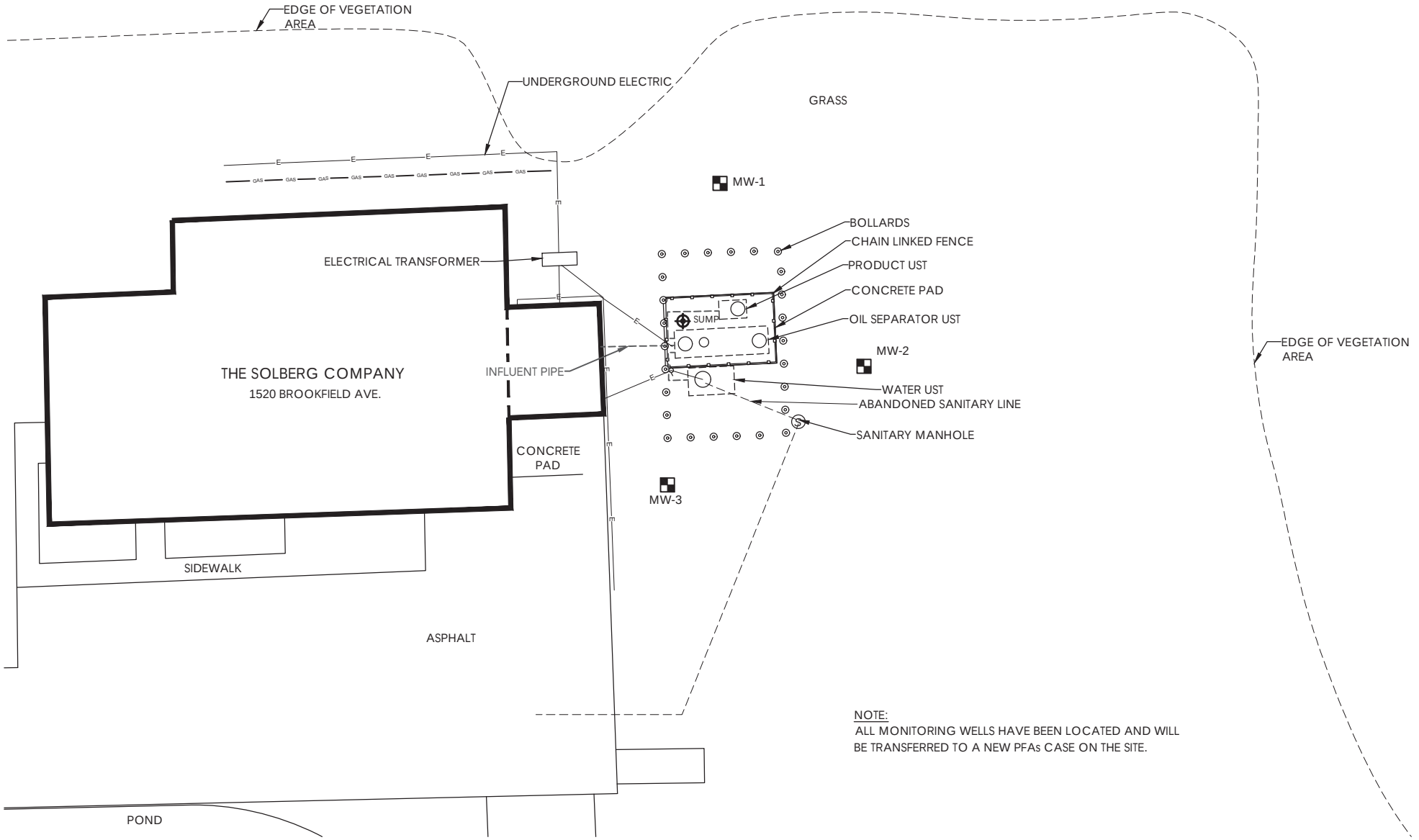
P.O. Box 340 • 916 Silver Lake Dr. • Portage, WI 53901
608-742-2169 (Office) • 608-742-2592 (Fax)
www.generalengineering.net

GROUNDWATER FLOW DIRECTION
OCTOBER 12, 2020
THE SOLBERG COMPANY
1520 BROOKFIELD AVE.
VILLAGE OF HOWARD
BROWN COUNTY, WI

DRAWN BY	KSP
REVIEWED BY	BLY
ISSUE DATE	MARCH 2021
GEC FILE NO.	2-0919-397
SHEET NO.	**B.3.c.2**

B.3.d. MONITORING WELLS

SEE ATTACHED (1)



N
W E
S
0 30'
15'

LEGEND

MW-2 MONITORING WELL

TANK SUMP

General Engineering Company

P.O. Box 340 • 916 Silver Lake Dr. • Portage, WI 53901

608-742-2169 (Office) • 608-742-2592 (Fax)

www.generalengineering.net

MONITORING WELLS

THE SOLBERG COMPANY
1520 BROOKFIELD AVE.
VILLAGE OF HOWARD
BROWN COUNTY, WI

DRAWN BY	KSP
REVIEWED BY	LMB
ISSUE DATE	OCT. 2020
GEC FILE NO.	2-0919-397
SHEET NO.	B.3.d

B.4. VAPOR MAPS AND OTHER MEDIA

BASED ON THE SOIL AND GROUDNWATER ANALYTICAL RESULTS, A VAPOR ASSESSMENT WAS NOT NECESSARY OR PERFORMED

B.4.a. VAPOR INTRUSION MAP (NONE)

BASED ON THE SOIL AND GROUDNWATER ANALYTICAL RESULTS, A VAPOR ASSESSMENT WAS NOT NECESSARY OR PERFORMED

B.4.b. OTHER MEDIA OF CONCERN

NO OTHER MEDIA OF CONCERN

B.4.c. OTHER

NONE

B.5. STRUCTURAL IMPEDIMENT PHOTOS

NOT APPLICABLE-NO STRUCTURAL IMPEDIMENTS WERE ENCOUNTERED

ATTACHMENT C

DOCUMENTATION OF REMEDIAL ACTION

C.1. SITE INVESTIGATION DOCUMENTATION

ALL SITE INVESTIGATION DOCUMENTATION HAS BEEN PREVIOUSLY SUBMITTED TO THE WDNR WITH THE EXCEPTION OF GROUNDWATER LABORATORY REPORTS AND CHAIN-OF-CUSTODY FOR OCTOBER 12, 2020. THE LAB REPORT AND CHAIN-OF-CUSTODY IS INCLUDED IN APPENDIX C.

Previous Primary Reports:

General Engineering Company

STATUS UPDATE (JANUARY 8, 2020)

STATUS UPDATE (APRIL 3, 2020)

SITE INVESTIGATION REPORT (JULY 23, 2020)

CHAIN OF CUSTODY RECORD

Synergy Environmental Lab, Inc.

www.synergy-lab.net
1990 Prospect Ct. • Appleton, WI 54914
920-830-2455 • mrsynergy@wi.twcbc.com

Chain # No 39036

Page ____ of ____

Sample Handling Request

____ Rush Analysis Date Required: _____
(Rushes accepted only with prior authorization)

X Normal Turn Around

Lab I.D. #	
QUOTE # :	
Project #:	
Sampler: (signature)	
Project (Name / Location):	Schreiber / Green Bay
Reports To:	Brian Wainwright
Company	GEC
Address	916 Silver Lake Drive
City State Zip	Portage WI 53901
Phone	608 697 8910
Email	bwainwright@synergylab.com
Invoice To:	C/O GEC
Company	
Address	
City State Zip	
Phone	
Email	

Lab I.D.	Sample I.D.	Collection Date	Collection Time	Filtered Y/N	No. of Containers	Sample Type (Matrix)*	Preservation
503865A	MW-1	10/12/20	Am	N	9	GW	HCl
B	MW-2	↓	↓	↓	↓	↓	↓
C	MW-3	↓	↓	↓	↓	↓	↓
D	Sump	↓	↓	↓	↓	↓	↓

Analysis Requested

DRO (Mod DRO Sep 95)	GRO (Mod GRO Sep 95)	LEAD	NITRATE/NITRITE	OIL & GREASE	PAH (EPA 8270)	PCB	PVOC (EPA 8021)	PVOC + NAPHTHALENE	SULFATE	TOTAL SUSPENDED SOLIDS	VOC DW (EPA 524.2)	VOC (EPA 8260)	VOC AIR (TO - 15)	8-RCRA METALS
								X						
								X						
								X						
								X						

Other Analysis

PID/FID

Comments/Special Instructions (*Specify groundwater "GW", Drinking Water "DW", Waste Water "WW", Soil "S", Air "A", Oil, Sludge, etc.)

Sample Integrity - To be completed by receiving lab.

Method of Shipment: Client

Temp. of Temp. Blank: _____ °C On Ice: X

Cooler seal intact upon receipt: X Yes ___ No

Relinquished By: (sign)	Time	Date	Received By: (sign)	Time	Date
		10/12/20			

Received in Laboratory By: _____ Time: 2:00 PM Date: 10-12-20

Synergy Environmental Lab, INC

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

BRIAN YOUNGWIRTH
GENERAL ENGINEERING
916 SILVER LAKE DRIVE
PORTAGE. WI 53901

Report Date *21-Oct-20*

Project Name SOLBERG/GREEN BAY **Invoice #** E38615
Proiect #

Lab Code 5038615A
Sample ID MW-1
Sample Matrix Water
Sample Date 10/12/2020

	Result	Unit	LOD	LOQ	Dil	Method	Ext Date	Run Date	Analyst	Code
Organic										
PVOC + Naphthalene										
Benzene	2.25	ug/l	0.33	1	1	8260B		10/16/2020	CJR	1
Ethylbenzene	102	ug/l	0.32	1	1	8260B		10/16/2020	CJR	1
Methyl tert-butyl ether (MTBE)	< 0.47	ug/l	0.47	1.5	1	8260B		10/16/2020	CJR	1
Naphthalene	11.4	ug/l	1.1	3.6	1	8260B		10/16/2020	CJR	1
Toluene	3.8	ug/l	0.26	0.83	1	8260B		10/16/2020	CJR	1
1,2,4-Trimethylbenzene	118	ug/l	0.3	0.96	1	8260B		10/16/2020	CJR	1
1,3,5-Trimethylbenzene	14.6	ug/l	0.32	1	1	8260B		10/16/2020	CJR	1
m&p-Xylene	74	ug/l	1.1	3.3	1	8260B		10/16/2020	CJR	1
o-Xylene	6.5	ug/l	0.38	1.2	1	8260B		10/16/2020	CJR	1

Project Name SOLBERG/GREEN BAY **Invoice #** E38615
Project #

Lab Code 5038615B
Sample ID MW-2
Sample Matrix Water
Sample Date 10/12/2020

	Result	Unit	LOD	LOQ	Dil	Method	Ext Date	Run Date	Analyst	Code
Organic										
PVOC + Naphthalene										
Benzene	2.27	ug/l	0.33	1	1	8260B		10/16/2020	CJR	1
Ethylbenzene	51	ug/l	0.32	1	1	8260B		10/16/2020	CJR	1
Methyl tert-butyl ether (MTBE)	< 0.47	ug/l	0.47	1.5	1	8260B		10/16/2020	CJR	1
Naphthalene	1.95 "J"	ug/l	1.1	3.6	1	8260B		10/16/2020	CJR	1
Toluene	< 0.26	ug/l	0.26	0.83	1	8260B		10/16/2020	CJR	1
1,2,4-Trimethylbenzene	0.96	ug/l	0.3	0.96	1	8260B		10/16/2020	CJR	1
1,3,5-Trimethylbenzene	< 0.32	ug/l	0.32	1	1	8260B		10/16/2020	CJR	1
m&p-Xylene	< 1.1	ug/l	1.1	3.3	1	8260B		10/16/2020	CJR	1
o-Xylene	< 0.38	ug/l	0.38	1.2	1	8260B		10/16/2020	CJR	1

Lab Code 5038615C
Sample ID MW-3
Sample Matrix Water
Sample Date 10/12/2020

	Result	Unit	LOD	LOQ	Dil	Method	Ext Date	Run Date	Analyst	Code
Organic										
PVOC + Naphthalene										
Benzene	< 0.33	ug/l	0.33	1	1	8260B		10/16/2020	CJR	1
Ethylbenzene	< 0.32	ug/l	0.32	1	1	8260B		10/16/2020	CJR	1
Methyl tert-butyl ether (MTBE)	< 0.47	ug/l	0.47	1.5	1	8260B		10/16/2020	CJR	1
Naphthalene	< 1.1	ug/l	1.1	3.6	1	8260B		10/16/2020	CJR	1
Toluene	< 0.26	ug/l	0.26	0.83	1	8260B		10/16/2020	CJR	1
1,2,4-Trimethylbenzene	< 0.3	ug/l	0.3	0.96	1	8260B		10/16/2020	CJR	1
1,3,5-Trimethylbenzene	< 0.32	ug/l	0.32	1	1	8260B		10/16/2020	CJR	1
m&p-Xylene	< 1.1	ug/l	1.1	3.3	1	8260B		10/16/2020	CJR	1
o-Xylene	< 0.38	ug/l	0.38	1.2	1	8260B		10/16/2020	CJR	1

Lab Code 5038615D
Sample ID SUMP
Sample Matrix Water
Sample Date 10/12/2020

	Result	Unit	LOD	LOQ	Dil	Method	Ext Date	Run Date	Analyst	Code
Organic										
PVOC + Naphthalene										
Benzene	< 0.33	ug/l	0.33	1	1	8260B		10/20/2020	CJR	1
Ethylbenzene	8.6	ug/l	0.32	1	1	8260B		10/20/2020	CJR	1
Methyl tert-butyl ether (MTBE)	< 0.47	ug/l	0.47	1.5	1	8260B		10/20/2020	CJR	1
Naphthalene	3.07 "J"	ug/l	1.1	3.6	1	8260B		10/20/2020	CJR	1
Toluene	< 0.26	ug/l	0.26	0.83	1	8260B		10/20/2020	CJR	1
1,2,4-Trimethylbenzene	25.5	ug/l	0.3	0.96	1	8260B		10/20/2020	CJR	1
1,3,5-Trimethylbenzene	3.2	ug/l	0.32	1	1	8260B		10/20/2020	CJR	1
m&p-Xylene	10.9	ug/l	1.1	3.3	1	8260B		10/20/2020	CJR	1
o-Xylene	2.14	ug/l	0.38	1.2	1	8260B		10/20/2020	CJR	1

"J" Flag: Analyte detected between LOD and LOQ LOD Limit of Detection LOQ Limit of Quantitation

Code	*Comment*
1	Laboratory QC within limits.

All solid sample results reported on a dry weight basis unless otherwise indicated. All LOD's and LOQ's are adjusted for dilutions but not dry weight. Subcontracted results are denoted by SUB in the analyst field.

Authorized Signature

C.2. INVESTIGATION WASTE

THERE IS NO WASTE REMAINING ON THE SITE

C.3. METHODOLOGY

THE NR 720 RCL SPREADSHEET WAS UTILIZED FOR THIS INVESTIGATION

C.4. CONSTRUCTION DOCUMENTATION

NOT APPLICABLE-NO REMEDIATION SYSTEM WAS CONSTRUCTED FOR THIS CASE

C.5. DECOMMISSIONING OF REMEDIAL SYSTEMS

NOT APPLICABLE- NO REMEDIATION SYSTEM WAS CONSTRUCTED FOR THIS CASE

C.6. OTHER

NOT APPLICABLE

ATTACHMENT D

MAINTENANCE PLAN (S) AND PHOTOGRAPHS

D.1.DESCRIPTION OF MAINTENANCE ACTION(S) REQUIRED FOR MAXIMIZING EFFECTIVENESS OF THE ENGINEERED CONTROL, VAPOR MITIGATION SYSTEM, FEATURE OR OTHER ACTION FOR WHICH MAINTENANCE IS REQUIRED

THERE IS NO MAINTENACNE PLAN REQUIRED FOR THIS CASE

D.2. LOCATION MAPS

NOT APPLICABLE

D.3. PHOTOGRAPHS

NOT APPLICABLE

D.4. INSPECTION LOG

NOT APPLICABLE

ATTACHMENT E

MONITORING WELL INFORMATION

MONITORING WELLS MW-1, MW-2, AND MW-3 WILL BE TRANSFERRED (SAME OWNER AND RESPONSBILE PARTY) FOR A SEPARATE PFAS INVESTIGATION (THE SOLBERG CO. – SITE 2 – 02-05-587486). MONITORING WELLS MW-1, MW-2, AND MW-3 WILL BE PROPERLY ABANDONED UPON CASE CLOSURE OF THE PFAS INVESTIGATION.

State of Wisconsin
Department of Natural Resources

Route To:
☐ Solid Waste ☐ Haz. Waste
☐ Emergency Response ☐ Underground Tanks
☐ Wastewater ☐ Water Resources
☐ Other

Soil Boring Log Information
Form 4400-122 7-91

Facility / Project Name	GEC Project No.	Wis. Unique No.	Boring Number
Perimeter Solutions (Solberg Co.)	2-0919-397	N/A	B-1 / MW-1

Boring Drilled By (Firm name and name of crew chief)	Drilling Method	Borehole Diameter
Horizons Const. & Exploration Greg & Ben	Direct Push	2"

Date Drilling Started	Date Drilling Ended	Boring Location State Plane N, E	WTM91	DNR County Code
11/19/2019	11/19/2019	NW- SE, Sect. 3, T24N, R20E	X 674303 Y 458545	5

Local Grid Location (If applicable)	County	Civil Town / City / Village
Feet S Feet W	Brown	Village of Howard

Depth Below Surface/Elev. (ft)	Length Att. Recovered (in)	VISUAL SOIL CLASSIFICATION Ground Surface Elevation:	Sample No.	USCS	Graphic Log	Well	Blow Count	N value	Odor	PID (ppm)	Remarks
1 / -1.0		Black, Sandy **SILT** with organics, moist (Topsoil)	SS-1	OL					No	0	
2 / -2.0		Tan, Silty Fine **SAND**, moist to wet							No	0	
3 / -3.0		Tan, Silty Fine **SAND**, wet	SS-2	SM					No	0	Lab sample
5 / -5.0			SS-3						No	0	
8 / -8.0			SS-4						No	0	
9 / -9.0		Reddish brown, Silty **CLAY**, wet		CL					No	0	
10 / -10		Tan, Silty Fine **SAND**, wet	SS-5	SM					No	0	
13 / -13.0		**END OF BORING: 12.5'**									
14.0 / -14.0											
15 / -15											
16.0 / -16.0											
17.0 / -17.0											
18.0 / -18.0		Note: Well was set with Protop									

I hereby certify that the information on this form is true and correct to the best of my knowledge

Signature: Beth A Erdman Beth Erdman Firm: **General Engineering Company**
916 Silver Lake Dr., P.O. BOX 340
Portage WI 53901

Lines of demarcation represent **approximate** boundaries between soil types. Variations may occur between sampling intervals and between boring locations, and the transition may be gradual.

State of Wisconsin
Department of Natural Resources

Route To:
☐ Solid Waste ☐ Haz. Waste
☐ Emergency Response ☐ Underground Tanks
☐ Wastewater ☐ Water Resources
☐ Other

Soil Boring Log Information
Form 4400-122 7-91

Facility / Project Name	GEC Project No.	Wis. Unique No.	Boring Number
Perimeter Solutions (Solberg Co.)	2-0919-397	N/A	**B-2 / MW-2**

Boring Drilled By (Firm name and name of crew chief)	Drilling Method	Borehole Diameter
Horizons Const. & Exploration Greg & Ben	Direct Push	2"

Date Drilling Started	Date Drilling Ended	Boring Location State Plane N, E	WTM91	DNR County Code
11/19/2019	11/19/2019	NW- SE, Sect. 3, T24N, R20E	X 674303 Y 458545	5

Local Grid Location (If applicable)	County	Civil Town / City / Village
Feet S Feet W	Brown	Village of Howard

Depth Below Surface/Elev. (ft)	Length Att. Recovered (in)	VISUAL SOIL CLASSIFICATION Ground Surface Elevation:	Sample No.	USCS	Graphic Log	Well	Blow Count	N value	Odor	PID (ppm)	Remarks
1 / -1.0		Black, Sandy **SILT** with organics, moist (Topsoil)	SS-1	OL					No	0	
2 / -2.0		Reddish brown, Silty **CLAY**, moist to wet		CL					No	0	
		Reddish brown, Silty **CLAY**, wet									
3 / -3.0		Tan, Silty Fine **SAND**, wet	SS-2	SM					No	0	**Lab sample**
4 / -4.0											
5 / -5.0			SS-3						No	0	
6 / -6.0		Brown, Medium **SAND**, wet							No	0	
7 / -7.0			SS-4	SP					No	0	
8 / -8.0											
9 / -9.0		Tan, Silty Fine **SAND**, wet							No	0	
10 / -10			SS-5	SM					No	0	
11 / -11.0											
12 / -12.0											
13 / -13.0		**END OF BORING: 12.5'**									
14.0 / -14.0											
15 / -15											
16.0 / -16.0											
17.0 / -17.0											
18.0 / -18.0		Note: Well was set with Protop									

I hereby certify that the information on this form is true and correct to the best of my knowledge

Signature: Beth H Erdman Beth Erdman Firm: **General Engineering Company**
916 Silver Lake Dr., P.O. BOX 340
Portage WI 53901

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State of Wisconsin
Department of Natural Resources

Route To:
☐ Solid Waste ☐ Haz. Waste
☐ Emergency Response ☐ Underground Tanks
☐ Wastewater ☐ Water Resources
☐ Other

Soil Boring Log Information
Form 4400-122 7-91

Facility / Project Name	GEC Project No.	Wis. Unique No.	Boring Number
Perimeter Solutions (Solberg Co.)	2-0919-397	N/A	B-3 / MW-3

Boring Drilled By (Firm name and name of crew chief)	Drilling Method	Borehole Diameter
Horizons Const. & Exploration Greg & Ben	Direct Push	2"

Date Drilling Started	Date Drilling Ended	Boring Location State Plane N, E	WTM91	DNR County Code
11/19/2019	11/19/2019	NW- SE, Sect. 3, T24N, R20E	X 674303 Y 458545	5

Local Grid Location (If applicable)	County	Civil Town / City / Village
Feet S Feet W	Brown	Village of Howard

Depth Below Surface/Elev. (ft)	Length Att. Recovered (in)	VISUAL SOIL CLASSIFICATION Ground Surface Elevation:	Sample No.	USCS	Graphic Log	Well	Blow Count	N value	Odor	PID (ppm)	Remarks
1 / -1.0		Brown **SAND**, trace gravel, damp (Fill)		Fill					No	0	
2 / -2.0		Tan, Silty Fine **SAND**, moist to wet	SS-1						No	0	
3 / -3.0		Tan, Silty Fine **SAND**, wet	SS-2						No	0	Lab sample
5 / -5.0			SS-3	SM					No	0	
7 / -7.0			SS-4						No	0	
9 / -9.0		Brown, Silty **SAND**, Wet							No	0	
10 / -10		Brown, Silty **CLAY**, wet	SS-5	CL					No	0	
13 / -13.0		**END OF BORING: 12.5'**									
18.0 / -18.0		Note: Well was set with Protop									

I hereby certify that the information on this form is true and correct to the best of my knowledge

Signature: Beth A. Erdman — Beth Erdman

Firm: **General Engineering Company**
916 Silver Lake Dr., P.O. BOX 340
Portage WI 53901

Lines of demarcation represent **approximate** boundaries between soil types. Variations may occur between sampling intervals and between boring locations, and the transition may be gradual.

State of Wisconsin
Department of Natural Resources

MONITORING WELL DEVELOPMENT

Form 4400-113B Rev. 7-98

Route to: Watershed/Wastewater ☐ Waste Management ☐
Remediation/Redevelopment ☒ Other ☐ _____

Facility/Project Name	County Name	Well Name
The Solbers Co.	Brown	MW-1
Facility License, Permit or Monitoring Number	**County Code**	**Wis. Unique Well Number**	**DNR Well ID Number**
	05	_____	___

1. Can this well be purged dry? ☒ Yes ☐ No

2. Well development method

surged with bailer and bailed	☒	41
surged with bailer and pumped	☐	61
surged with block and bailed	☐	42
surged with block and pumped	☐	62
surged with block, bailed and pumped	☐	70
compressed air	☐	20
bailed only	☐	10
pumped only	☐	51
pumped slowly	☒	50
Other _____	☐	

3. Time spent developing well 35 min.

4. Depth of well (from top of well casisng) 15.05 ft.

5. Inside diameter of well 2.0 in.

6. Volume of water in filter pack and well casing 11.3 gal.

7. Volume of water removed from well 200.0 gal.

8. Volume of water added (if any) 0.__ gal.

9. Source of water added ↗

10. Analysis performed on water added? ☐ Yes ☐ No
(If yes, attach results) N/A

	Before Development	After Development
11. Depth to Water (from top of well casing)	a. 2.61 ft.	___.__ ft.
Date	b. 11/26/2019 m m d d y y y y	__/__/____ m m d d y y y y
Time	c. 9:40 ☒ a.m. ☐ p.m.	10:15 ☒ a.m. ☐ p.m.
12. Sediment in well bottom	__.__ inches	__.__ inches
13. Water clarity	Clear ☐ 10 Turbid ☒ 15 (Describe)	Clear ☒ 20 Turbid ☐ 25 (Describe)

Fill in if drilling fluids were used and well is at solid waste facility:

14. Total suspended solids	____.__ mg/l	____.__ mg/l
15. COD	____.__ mg/l	____.__ mg/l

16. Well developed by: Name (first, last) and Firm
First Name: Last Name:
Firm:

17. Additional comments on development:

Name and Address of Facility Contact /Owner/Responsible Party
First Name: Mitch Last Name: Hubert
Facility/Firm: Perimeter Solutions
Street: 1520 Brookfield Avenue
City/State/Zip: Green Bay, WI 54313

I hereby certify that the above information is true and correct to the best of my knowledge.
Signature:
Print Name: Brian Youngwirth
Firm: GEC

NOTE: See instructions for more information including a list of county codes and well type codes.

State of Wisconsin
Department of Natural Resources

MONITORING WELL DEVELOPMENT

Form 4400-113B Rev. 7-98

Route to: Watershed/Wastewater ☐ Waste Management ☐
Remediation/Redevelopment ☒ Other ☐ _____

Facility/Project Name	County Name	Well Name
The Solbers Co.	Brown	MW-2
Facility License, Permit or Monitoring Number	**County Code**	**Wis. Unique Well Number**	**DNR Well ID Number**
	05	_____	___

1. Can this well be purged dry? ☒ Yes ☐ No

2. Well development method

surged with bailer and bailed	☒	41
surged with bailer and pumped	☐	61
surged with block and bailed	☐	42
surged with block and pumped	☐	62
surged with block, bailed and pumped	☐	70
compressed air	☐	20
bailed only	☐	10
pumped only	☐	51
pumped slowly	☒	50
Other _____	☐	

3. Time spent developing well 55 min.

4. Depth of well (from top of well casisng) 15.05 ft.

5. Inside diameter of well 2.0 in.

6. Volume of water in filter pack and well casing 10.95 gal.

7. Volume of water removed from well 35.0 gal.

8. Volume of water added (if any) 0. gal.

9. Source of water added /

10. Analysis performed on water added? ☐ Yes ☐ No
(If yes, attach results) N/A

	Before Development	After Development
11. Depth to Water (from top of well casing)	a. 3.01 ft.	____.__ ft.
Date	b. 11/26/2019 (m m d d y y y y)	__/__/____ (m m d d y y y y)
Time	c. 8:55 ☒ a.m. ☐ p.m.	9:50 ☒ a.m. ☐ p.m.
12. Sediment in well bottom	___.__ inches	___.__ inches
13. Water clarity	Clear ☐ 10 Turbid ☒ 15 (Describe)	Clear ☒ 20 Turbid ☐ 25 (Describe)

Fill in if drilling fluids were used and well is at solid waste facility:

14. Total suspended solids	____.__ mg/l	____.__ mg/l
15. COD	____.__ mg/l	____.__ mg/l

16. Well developed by: Name (first, last) and Firm
First Name: Brian Last Name: Youngwirth
Firm: General Engineering Company (GEC)

17. Additional comments on development:

Name and Address of Facility Contact /Owner/Responsible Party
First Name: Mitch Last Name: Hubert
Facility/Firm: Perimeter Solutions
Street: 1520 Broadhead Avenue
City/State/Zip: Green Bay, WI 54313

I hereby certify that the above information is true and correct to the best of my knowledge.
Signature: [signature]
Print Name: Brian Youngwirth
Firm: GEC

NOTE: See instructions for more information including a list of county codes and well type codes.

State of Wisconsin
Department of Natural Resources

MONITORING WELL DEVELOPMENT

Form 4400-113B Rev. 7-98

Route to: Watershed/Wastewater ☐ Waste Management ☐
Remediation/Redevelopment ☒ Other ☐ _____

Facility/Project Name	County Name	Well Name
The Solbers Co.	Brown	MW-3
Facility License, Permit or Monitoring Number	**County Code**	**Wis. Unique Well Number**	**DNR Well ID Number**
	05	_____	___

1. Can this well be purged dry? ☒ Yes ☐ No

2. Well development method

surged with bailer and bailed	☒	41
surged with bailer and pumped	☐	61
surged with block and bailed	☐	42
surged with block and pumped	☐	62
surged with block, bailed and pumped	☐	70
compressed air	☐	20
bailed only	☐	10
pumped only	☐	51
pumped slowly	☒	50
Other _____	☐	

3. Time spent developing well 51 min.

4. Depth of well (from top of well casisng) 15.05 ft.

5. Inside diameter of well 2.0 in.

6. Volume of water in filter pack and well casing 7.35 gal.

7. Volume of water removed from well 35.0 gal.

8. Volume of water added (if any) 0. gal.

9. Source of water added —

10. Analysis performed on water added? ☐ Yes ☐ No
(If yes, attach results) N/A

	Before Development	After Development
11. Depth to Water (from top of well casing)	a. 6.92 ft.	___.__ ft.
Date	b. 1/16/2019 (m m d d y y y y)	__/__/____ (m m d d y y y y)
Time	c. 8:44 ☒ a.m. ☐ p.m.	9:35 ☒ a.m. ☐ p.m.
12. Sediment in well bottom	___.__ inches	___.__ inches
13. Water clarity	Clear ☐ 10 Turbid ☒ 15 (Describe)	Clear ☒ 20 Turbid ☐ 25 (Describe)
14. Total suspended solids	_____.__ mg/l	_____.__ mg/l
15. COD	_____.__ mg/l	_____.__ mg/l

Fill in if drilling fluids were used and well is at solid waste facility:

16. Well developed by: Name (first, last) and Firm
First Name: Brian Last Name: Youngwirth
Firm: General Engineering Company (GEC)

17. Additional comments on development:

Name and Address of Facility Contact /Owner/Responsible Party
First Name: Mitch Last Name: Hubert
Facility/Firm: Perimeter Solutions
Street: 1520 Brookfield Avenue
City/State/Zip: Green Bay, WI 54313

I hereby certify that the above information is true and correct to the best of my knowledge.
Signature: [signature]
Print Name: Brian Youngwirth
Firm: GEC

NOTE: See instructions for more information including a list of county codes and well type codes.

ATTACHMENT F

SOURCE LEGAL DOCUMENTS

F.1. DEED

SEE ATTACHED

2847570
CHERYL BERKEN
BROWN COUNTY RECORDER
GREEN BAY, WI
RECORDED ON
01/02/2019 10:37 AM
REC FEE: 30.00
TRANS FEE: 7,200.00
EXEMPT #

PAGES: 3
The above recording information verifies that this document has been electronically recorded and returned to the submitter

SPECIAL WARRANTY DEED

Document Number | Document Title

THIS DEED, made between **AMEREX CORPORATION**, an Alabama corporation ("Grantor"), and **PERIMETER SOLUTIONS, LP**, a Delaware limited partnership, with an address of 8000 Maryland Avenue, Suite 350, Clayton, Missouri 63105, Attn: Nori Yokozuka, General Counsel ("Grantee"),

WITNESSETH, that the said Grantor, for a valuable consideration of One Dollar ($1.00) and other good and valuable consideration conveys to Grantee the following described real estate in Brown County, State of Wisconsin:

See Exhibit A attached hereto and incorporated herein.

Parcel Identification Number: VH-3175

This is not homestead property.

Recording Area

Name and Return Address:

PERIMETER SOLUTIONS, LP
8000 Maryland Ave. Suite 350
Clayton, MO 63105
Attn: Nori Yokozuka, General Counse

THE CONVEYANCE EVIDENCED hereby and Grantor's limited warranty of title contained herein are expressly made SUBJECT TO (1) all real estate taxes and assessments and personal property taxes for the current year and thereafter; (2) all covenants, conditions, restrictions, easements and other encumbrances of public record, zoning regulations, and public rights-of-way; (3) mineral and mining rights not owned by Grantor; and (4) any matters that would be disclosed by a true and accurate survey of the property (collectively, the foregoing are referred to as the "Permitted Exceptions").

Together with all and singular the hereditaments and appurtenances thereunto belonging; and Grantor warrants that the title is good, indefeasible in fee simple and free and clear of encumbrances by, through or under Grantor, except for the Permitted Exceptions, but not further or otherwise.

Dated this 31 day of December, 2018.

[Remainder of Page Intentionally Left Blank; Signature Appears on Following Page.]

IN WITNESS WHEREOF, Grantor has caused its name to be signed to these presents the day and year first above written.

AMEREX CORPORATION, an Alabama corporation

By: _____
Printed Name: Harrison Bishop
Title: President

ACKNOWLEDGEMENT

STATE OF Alabama }
} SS.
COUNTY OF Jefferson }

This instrument was acknowledged before me on 27th day of December, 2018, by Harrison Bishop as President of Amerex Corporation, an Alabama corporation.

_____
Printed Name: SANDRA C CAPTAIN

Notary Public, State of Alabama

[SEAL]

My Commission Expires: July 2, 2020

THIS INSTRUMENT WAS DRAFTED BY:

Laura Corcoran
Thompson Coburn LLP
One US Bank Plaza
St. Louis, Missouri 63101

04617599.1

EXHIBIT A

All of Grantor's right, title and interest in and to that certain real property located in Brown County, Wisconsin and more particularly described as follows:

LOT FIVE (5), ACCORDING TO THE RECORDED PLAT OF BROOKFIELD BUSINESS PARK FIRST ADDITION, A COUNTY PLAT, IN THE VILLAGE OF HOWARD, BROWN COUNTY, WISCONSIN.

F.2. CERTIFIED SURVEY MAP

SEE ATTACHED

Brookfield Business Park First Addition

~ A County Plat ~

All of Lot 4, of Brookfield Business Park, A County Plat, recorded in Volume 1, County Plats, page 240, Document Number 2393272, Brown County Records, being located in part of the Southwest 1/4 of the Southeast 1/4 and the Northwest 1/4 of the Southeast 1/4 of Section 3, T24N-R20E, in the Village of Howard, Brown County, Wisconsin.

Office of the Register of Deeds
Brown County, Wisconsin
Received for Record March 31st 2011
at 3:24 o'clock P M and recorded as
Document # 2520530
Volume 1 of County on Page 260
Cathy Williquette Register of Deeds

Surveyor's Certificate

I, David J. Chrouser, Registered Land Surveyor, S-1579, hereby certify:

That in full compliance with the provisions of Chapter 236, Wisconsin Statutes, and the subdivision regulations of the Village of Howard and the Brown County Planning Commission and under the direction of the owners listed hereon, I have surveyed, divided and mapped "Brookfield Business Park First Addition, A County Plat", and that such plat correctly represents all exterior boundaries and the subdivision of the land surveyed and is all of Lot 4, of Brookfield Business Park, recorded in Volume 1, County Plats, page 240, Document Number 2393272, Brown County Records, being located in part of the Southwest 1/4 of the Southeast 1/4 and the Northwest 1/4 of the Southeast 1/4 of Section 3, T24N–R20E, in the Village of Howard, Brown County, Wisconsin, more fully described as follows:

Commencing at the South 1/4 corner of Section 3, T24N–R20E; thence N00°36'04"E, 815.48 feet along the north–south quarter line of said Section 3; thence N88°50'43"E, 45.02 feet, to the easterly right of way of Brookfield Avenue, to the southwest corner of Lot 4, of Brookfield Business Park, A county Plat, recorded in Vol.1 County Plats Pg.240, Doc.#2393272, Brown County records, and the POINT OF BEGINNING; thence N00°36'04"E, 1705.92 feet along the west line of said Lot 4 and said right of way; thence N88°58'38"E, 1273.92 feet along the north lines of said Lot 4; thence S00°16'37"W, 1553.42 feet along an Easterly line of said lot 4; thence S88°50'43"W, 438.74 feet along a southerly line of said lot 4 and the northerly line of Vol.44 Certified Survey Maps Pg.320, Map #7306, Doc.#2189006, Brown County Records; thence S00°16'37"W, 148.92 feet along an easterly line of said Lot 4 and the west line of said Certified Survey Map; thence S88°50'43"W, 844.92 feet along the line between lots 3 & 4 of said plat to the POINT OF BEGINNING.

Parcel contains 2,113,132 square feet / 48.51 acres, more or less.
Parcel subject to easements and restrictions of record.

January 3, 2011

Graphic Scale

200 100 0 200 400 600

Village of Howard

Approved for the Village of Howard this 31st day of March, 2011.

Robert Bartelt
Village Administrator

Brown County Planning Commission

Approved for the Brown County Plan Commission this 31st day of March, 2011.

Peter Schleine — Senior Planner — COLE RAUCE — PRINCIPAL PLANNER

Treasurer's Certificate

As duly elected Village Treasurer and Brown County Treasurer, We hereby certify that the records in our office show no unredeemed tax sales and no unpaid taxes or special assessments affecting any of the lands included in this Plat as of the dates listed below.

Chris Haltom — Village of Howard Treasurer — Date 3/31/11

Kerry W. Blaney — Brown County Treasurer — Date 3-31-11

Owner's Certificate

KRAM Properties LLC, a limited liability company duly organized and existing under and by virtue of the laws of the State of Wisconsin, does hereby certify that we caused the land described on "Brookfield Business Park First Addition, A County Plat" to be surveyed, divided, mapped and dedicated as represented hereon. KRAM Properties LLC also certifies that this Plat is required by S.236.10 or S.236.12 to be submitted to the following for approval or objection:

VILLAGE OF HOWARD
BROWN COUNTY PLANNING COMMISSION

In Witness Whereof, the said KRAM Properties LLC has caused these presents to be signed by Russell V. Roland, Greg J. Klimek, Wade T. Micoley & James C. Appleton, its Members, on this 24th day of March, 2011.

Russell V. Roland — Member – KRAM Properties LLC
Greg J. Klimek — Member – KRAM Properties LLC
Wade T. Micoley — Member – KRAM Properties LLC
James C. Appleton — Member – KRAM Properties LLC

Personally came before me this 24th day of March, 2011, the above named Member of said Limited Liability Company and acknowledged that they executed the foregoing instrument as such Member as the deed of said Limited Liability Company, by its authority.

Notary Public, Brown County, Wisconsin — My Commission Expires 1-11-15

STATE OF WISCONSIN } SS
COUNTY OF BROWN }

Consent of Corporate Mortgage

M & I Bank (name of bank), a corporation duly organized and existing under and by virtue of the laws of Wisconsin, mortgagee of the above described land, does hereby consent to the surveying, dividing, mapping and dedication of the land described on this plat and does hereby consent to the above certificate of KRAM Properties (name of property owner(s)) Owner(s).

IN WITNESS WHEREOF, M & I Bank (name of bank) has caused these presents to be signed by Thomas Erickson (print name #1 above), its Senior Vice President (print title #1 above) and countersigned by _____ (print name #2 above) Its _____ (print title #2 above), at Green Bay, WI (city) (state), this 8th (day) day of March (month) 2011.

(signature #1) _____ (signature #2) _____ (seal)
(print name #1) Thomas Erickson (print name #2) _____
(print title #1) Senior Vice President (print title #2) _____

Personally came before me this 8th day of March 2011 the above named officers of said corporation to me known to be the persons who executed the foregoing instrument and to me known to be such officers of said corporation, and acknowledged that they executed the foregoing instrument as such officers as the deed of said corporation, by its authority.

Notary Public — My Commission Expires 1-11-15

STATE OF WISCONSIN] ss
COUNTY OF BROWN }

Restrictive Covenants

1) Lots 5 & 6 contain an environmentally sensitive area (ESA) as defined in the Brown County Sewage Plan. The ESA includes wetlands, all land within 50 feet of wetlands 2 acres or greater, and all land within 25 feet of a non–navigable waterway. Development and land disturbing activities are restricted in the ESA unless amendments are approved by the Brown County Planning Commission and the Wisconsin Department of Natural Resources.

2) The land on all side and rear lot lines of all lots shall be graded by the property owner and maintained by the abutting property owners to provide for adequate drainage of surface water.

3) Each lot owner shall grade the property to conform to the adopted sidewalk grade elevation and maintain said elevation for future sidewalks.

4) No poles, pedestals or buried cable are to be placed so as to disturb any survey stake or obstruct vision along any lot lines or street line. a disturbance of a survey stake by anyone is a violation of section 236.32 of the Wisconsin Statutes.

Notes

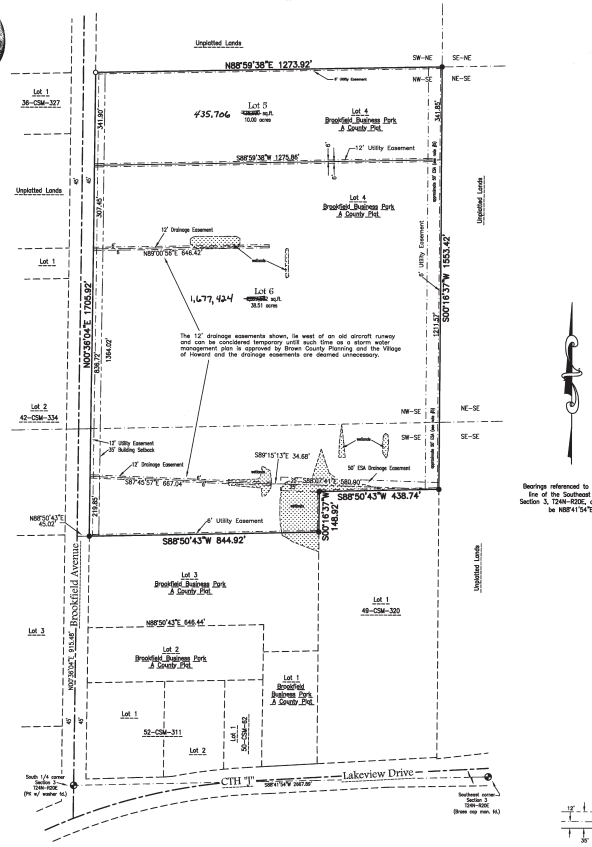
1) The property owner, at the time of construction, shall implement the appropriate soil erosion control methods outlined in the Wisconsin Department of Natural Resources' applicable WDNR Technical Standards, to prevent soil erosion. However, if the Village/Town, at the time of construction, has adopted a soil erosion control ordinance, it shall govern over this requirement. This provision applies to any grading, construction, or installation–related activities.

2) Wetlands depicted as delineated by George & Holet Soil Consultants, Inc., November, 2007.

3) A Shoreland Permit from the Brown County Zoning Administrator's office is required prior to any construction, fill, or grading activity within 300 feet of a stream.

4) Lot 5 & 6 may include wetland areas that may require permits from the Wisconsin Department of Natural Resources, Army Corps of Engineers, or the Brown County Zoning Administrators Office prior to any development activity.

5) Additional wetlands may exist along the east line Lots 5 & 6 and adjoining properties to the east. Due to the large size of the lots and the location of the wetland and ESA on the adjacent parcels (VH–130–1, VH–131 & VH–135), a wetlands delineation is not required at this time. The wetland and ESA boundary shall be properly identified by a certified wetland delineator hired by the affected landowner, and reviewed and concurred with by the appropriate regulatory agency should any development occur within 50 feet of the wetland or ESA east of Lots 5 & 6. Any WDNR–approved wetland delineation report/map, along with the approval letter, shall be submitted to Brown County Planning Commission for verification.



Bearings referenced to the South line of the Southeast 1/4 of Section 3, T24N–R20E, assumed to be N88°41'54"E.

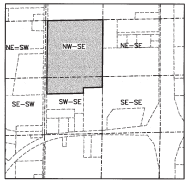
Legend

- ○ 2" Iron pipe found.
- ● 1" Iron pipe found
- ⊕ Brown County Monument – type noted
- All other lot corners marked with a 1.32" (o.d.) x 18" iron pipe weighing 1.68 lbs/lin. foot.
- All linear measurements have been made to the nearest hundredth of a foot.

12' — 35' Building setback (unless noted)

12' Utility easement (unless noted)

Location Sketch



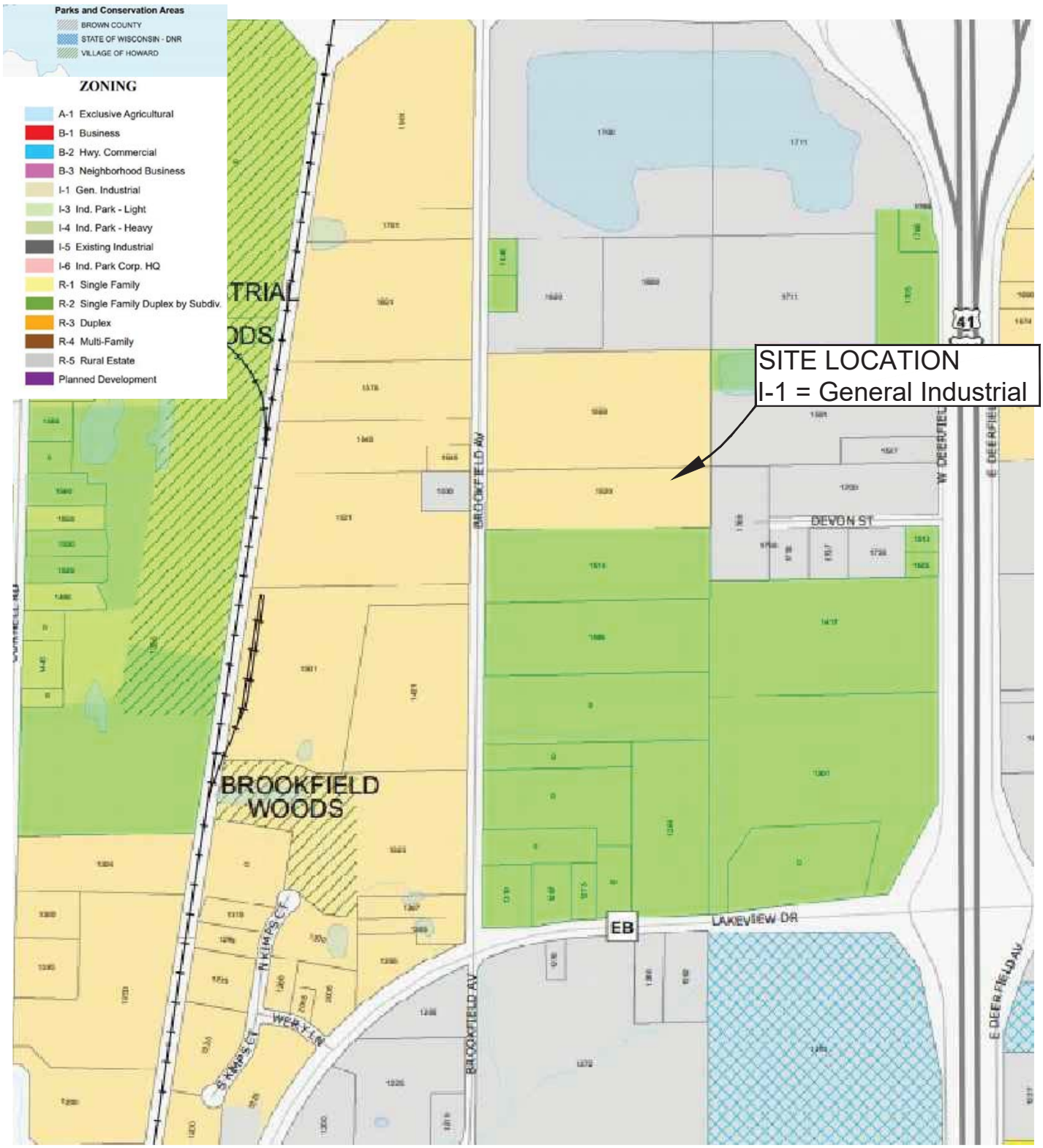
Section 3, T24N-R20E
Village of Howard

PROJECT NO. R-1400	Brookfield Business Park	SCALE: 1" = 200'	REUSE OF THIS DOCUMENT: All rights including copyrights are retained by Mau & Associates. The client and/or recipient agrees to the fullest extent permitted by law to indemnify and hold Mau & Associates harmless for any reuse of or changes made to the original drawing or data without prior written consent by Mau & Associates.
SHEET NO. 1 of 1	KRAM Properties LLC	TAX PARCEL NO. VH-3161	
DRAWING NO. P-2117		DRAWN BY: DJC	File: R-1400Plat 123010.dwg

Mau & Associates
LAND SURVEYING & PLANNING
CIVIL & WATER RESOURCE ENGINEERING
400 Security Boulevard * Green Bay, Wisconsin 54313
Phone: 920-434-9670 Fax: 920-434-9672

F.3. VERIFICATION OF ZONING

SEE ATTACHED



N
W E
S

FROM THE VILLAGE OF HOWARD ZONING MAP FROM DEC. 12, 2019

General Engineering Company

P.O. Box 340 • 916 Silver Lake Dr. • Portage, WI 53901
608-742-2169 (Office) • 608-742-2592 (Fax)
www.generalengineering.net

VERIFICATION OF ZONING

THE SOLBERG COMPANY

1520 BROOKFIELD AVE.
VILLAGE OF HOWARD
BROWN COUNTY, WI

DRAWN BY	LMB
REVIEWED BY	KSP
ISSUE DATE	OCT. 2020
GEC FILE NO.	2-0919-397
SHEET NO.	F.3

F.4. SIGNED STATEMENT

SEE ATTACHED

Parcel No. VH-3175

1520 Brookfield Avenue
Village of Howard, Wisconsin

WDNR BRRTs # 03-05-584180

In accordance with NR 726.11, the responsible party hereby affirms the following information:

To the best of my knowledge, the legal description information attached to this package for the source property (1520 Brookfield Avenue, Village of Howard, Wisconsin--Parcel ID VH-3175) is complete and accurate.

Mitch Hubert

Mr. Mitch Hubert
Perimeter Solutions, LP

ATTACHMENT G

NOTIFICATIONS TO OWNERS OF AFFECTED PROPERTIES

NO NOTIFICATIONS WERE REQUIRED FOR THIS PETROLEUM RELEASE