State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
2501 Golf Course Road
Ashland WI 54806

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

October 23, 2020

MS JUNE EVANS
BMO HARRIS BANK
111 W MONROE ST
CHICAGO IL 60603

MR KEAN CLIFFORD
BL BRANCH GROUP II LLC
100 INTREPID LN
SYRACUSE NY 13205

KEEP THIS DOCUMENT WITH YOUR PROPERTY RECORDS

SUBJECT: Final Case Closure with Continuing Obligations
BMO Harris Bank Branch Property
900 East Main Street, Merrill, Wisconsin
DNR BRRTS Activity #02-35-584409

Dear Ms. Evans and Mr. Clifford:

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

This final closure decision is based on the correspondence and data provided and is issued under Wis. Admin. Code chs. NR 726 and 727. The DNR's Northern Region Closure Committee reviewed the request for closure on May 7, 2020. The Closure Committee reviewed this environmental remediation case for compliance with state laws and standards to maintain case closure consistency. The DNR issued a request for remaining actions needed on May 13, 2020, and documentation that the conditions in that letter were met was received on July 24, 2020.

Historically, the northern parcel had been occupied by a dry-cleaning facility with a gasoline underground storage tank and an automotive repair shop between the 1920s and early 1960s, after which time the property was developed with the current BMO Harris Bank. The subject property consists of a commercial structure on the southern lot and a drive through teller structure which is situated north of the bank building. Asphalt parking areas are generally located within the northern portion of the parcel. Polynuclear aromatic hydrocarbons and metals above soil standards were detected during the site investigation. The extent of contamination was determined to be in the soil fill of the north central property parking lot area. The existing asphalt pavement and concrete retaining wall of the north portion of the property acts as a cover over the residual soil contamination to prevent direct contact and minimize infiltration of rainwater. The conditions of closure and continuing obligations required were based on the property being used for commercial purposes.

This Site has been investigated for discharges of hazardous substances, environmental pollution or both from the former underground storage tank and use of the Site as an automotive repair shop. Case closure under Wis. Admin. Code ch. NR 726 is granted for the contaminants analyzed during the site investigation, as documented in the DNR's site file, including the lab data sheets. The site investigation addressed soil contamination.

Continuing Obligations

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

- Residual soil contamination exists that must be properly managed should it be excavated or removed.
- The existing asphalt pavement cover must be maintained over contaminated soil and the DNR must be notified and approve any changes to this barrier.

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

DNR Database

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

The DNR's approval prior to well construction or reconstruction is required in accordance with Wis. Admin. Code § NR 812.09 (4) (w). This requirement applies to private drinking water wells and high capacity wells. To obtain approval, complete and submit Form 3300-254 to the DNR Drinking and Groundwater program's regional water supply specialist. This form can be obtained on-line at dnr.wi.gov and search "3300-254".

All site information is also on file at the DNR's Northern Region office, at 107 Sutliff Avenue in Rhinelander, Wisconsin. This letter and information that was submitted with your closure request application, including any maintenance plan and maps, can be found as a Portable Document Format (PDF) in BOTW.

Prohibited Activities

Certain activities are prohibited at closed sites because maintenance of a barrier is intended to prevent contact with any remaining contamination. When a barrier is required, the condition of closure requires notification of the DNR before making a change, in order to determine if further action is needed to maintain the protectiveness of the remedy employed. The following activities are prohibited on any portion of the property where the existing pavement cover is required, as shown on the attached map, D.2 Location Map, prepared by Professional Service Industries, Inc. (PSI) and dated February 7, 2019, unless prior written approval has been obtained from the DNR:

- removal of the existing barrier or cover;
- replacement with another barrier or cover;
- excavating or grading of the land surface;
- filling on covered or paved areas;
- plowing for agricultural cultivation;
- construction or placement of a building or other structure;
- changing the use or occupancy of the property to a residential exposure setting, which may include certain uses, such as single or multiple family residences, a school, day care, senior center, hospital, or similar residential exposure settings.

Closure Conditions

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

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

Department of Natural Resources
Attn: Remediation and Redevelopment Program Environmental Program Associate
107 Sutliff Avenue
Rhinelander, WI 54501

Residual Soil Contamination (Wis. Admin. Code ch. NR 718, chs. NR 500 to 536, or Wis. Stat. ch. 289)
Soil contamination remains as indicated on the attached Figure B.2.B. Residual Soil Contamination, prepared by PSI and dated February 7, 2019. If soil in the specific locations described above is excavated in the future, the property owner or right-of-way holder at the time of excavation must sample and analyze the excavated soil to determine if contamination remains. If sampling confirms that contamination is present, the property owner or right-of-way holder at the time of excavation will need to determine whether the material is considered solid or hazardous waste and ensure that any storage, treatment or disposal is in compliance with applicable standards and rules. Contaminated soil may be managed in accordance with ch. NR 718, Wis. Admin. Code, with prior DNR approval.

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

Cover or Barrier (Wis. Stat. § 292.12 (2) (a), Wis. Admin. Code §§ NR 726.15, NR 727.07)
The existing asphalt pavement on the north central portion of the property in the location shown on the attached map, D.2 Location Map, shall be maintained in compliance with the attached maintenance plan in order to minimize the infiltration of water and prevent additional groundwater contamination that would violate the groundwater quality standards in Wis. Admin. Code ch. NR 140, and prevent direct contact with residual soil contamination that might otherwise pose a threat to human health.

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

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

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

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

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

The maintenance plan and inspection log (DNR Form 4400-305) included as part of the attachment D.1 Cover/Barrier Maintenance Plan. are to be kept up-to-date and on-site. Inspections shall be conducted annually, in accordance with the attached maintenance plan. Submit the inspection log to the DNR only upon request.

Wis. Admin. Code Chapter NR 140 Exemption

Recent groundwater monitoring data at this site indicates that for benzo(b)fluoranthene and chrysene at monitoring well MW-1, and for tetrachloroethylene (also known as PCE) at MW-2, contaminant levels exceed the ch. NR 140 preventive action limit (PAL) but are below the enforcement standard (ES). The DNR may grant an exemption to a PAL for a substance of public health concern, other than nitrate, pursuant to Wis. Admin. Code § NR 140.28 (2) (b), if all of the following criteria are met:

1. The measured or anticipated increase in the concentration of the substance will be minimized to the extent technically and economically feasible.
2. Compliance with the PAL is either not technically or economically feasible.
3. The ES for the substance will not be attained or exceeded at the point of standards application. [Note: at this site the point of standards application is all points where groundwater is monitored.]
4. Any existing or projected increase in the concentration of the substance above the background concentration does not present a threat to public health or welfare.

Based on the information you provided, the DNR believes that these criteria have been or will be met. Therefore, pursuant to Wis. Admin. Code § NR 140.28, an exemption to the PAL is granted for benzo(b)fluoranthene and chrysene at MW-1 and PCE at MW-2. Please keep this letter, because it serves as your exemption.

In Closing

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

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

The DNR appreciates your efforts to restore the environment at this site. If you have any questions regarding this closure decision or anything outlined in this letter, please contact Project Manager, Aaron Zielsdorf at (715) 203-2987 or by email at Aaron.Zielsdorf@Wisconsin.gov. You can also contact me at (715) 208-4004, or by email at Christopher.Saari@Wisconsin.gov.

Sincerely,

Christopher A. Saari
Northern Region Team Supervisor
Remediation and Redevelopment Program

Enclosure: Continuing Obligations for Environmental Protection, DNR Publication RR-819

Attachments:

- Figure B.2.B. Residual Soil Contamination, PSI, February 7, 2019
- Figure D.2 Location Map, PSI, February 7, 2019
- Attachment D.1 Cover/Barrier Maintenance Plan, PSI, April 7, 2020
- Continuing Obligations Inspection and Maintenance Log, DNR Form 4400-305

cc: Patrick Patterson –PSI (Patrick.Patterson@intertek.com)
Aaron Zielsdorf – DNR Antigo (Aaron.Zielsdorf@Wisconsin.gov)

State of Wis., Dept. of Natural Resources
dnr.wi.gov

Well / Drillhole / Borehole Filling & Sealing Report

Form 3300-005 (R 4/2015)

Notice: Completion of this report is required by chs. 160, 281, 283, 289, 291-293, 295, and 299, Wis. Stats., and chs. NR 141 and 812, Wis. Adm. Code. In accordance with chs. 281, 289, 291-293, 295, and 299, Wis. Stats., failure to file this form may result in a forfeiture of between $10-25,000, or imprisonment for up to one year, depending on the program and conduct involved. Personally identifiable information on this form is not intended to be used for any other purpose. Return form to the appropriate DNR office and bureau. See instructions on reverse for more information.

☐ **Verification Only of Fill and Seal**

Route to DNR Bureau:
☐ Drinking Water ☐ Watershed/Wastewater ☐ Remediation/Redevelopment
☐ Waste Management ☐ Other: _____

1. Well Location Information

County	WI Unique Well # of Removed Well	Hicap #
Lincoln	_ _ _ _ _ _	

Latitude / Longitude (see instructions): _____ N, _____ W
Format Code: ☐ DD ☐ DDM
Method Code: ☐ GPS008 ☐ SCR002 ☐ OTH001

¼ / ¼	¼	Section	Township	Range
or Gov't Lot #			N	☐ E ☐ W

Well Street Address: 2900 E Main St
Well City, Village or Town: Merrill
Well ZIP Code: 54452
Subdivision Name:
Lot #:
Reason for Removal from Service: site closure
WI Unique Well # of Replacement Well: _ _ _ _ _ _

2. Facility / Owner Information

Facility Name: BMO Harris Bank
Facility ID (FID or PWS):
License/Permit/Monitoring #:
Original Well Owner:
Present Well Owner:
Mailing Address of Present Owner:
City of Present Owner | State | ZIP Code:

3. Filled & Sealed Well / Drillhole / Borehole Information

☒ Monitoring Well
☐ Water Well MW-1
☐ Borehole / Drillhole

Original Construction Date (mm/dd/yyyy): 08/28/2019
If a Well Construction Report is available, please attach.

Construction Type:
☒ Drilled ☐ Driven (Sandpoint) ☐ Dug
☐ Other (specify): _____

Formation Type:
☒ Unconsolidated Formation ☐ Bedrock

Total Well Depth From Ground Surface (ft.)	Casing Diameter (in.)
16	2
Lower Drillhole Diameter (in.)	**Casing Depth (ft.)**
8.25	16

Was well annular space grouted? ☐ Yes ☒ No ☐ Unknown
If yes, to what depth (feet)?
Depth to Water (feet):

4. Pump, Liner, Screen, Casing & Sealing Material

Pump and piping removed?	☐ Yes	☐ No	☒ N/A
Liner(s) removed?	☐ Yes	☒ No	☐ N/A
Liner(s) perforated?	☐ Yes	☒ No	☐ N/A
Screen removed?	☐ Yes	☒ No	☐ N/A
Casing left in place?	☒ Yes	☐ No	☐ N/A
Was casing cut off below surface?	☒ Yes	☐ No	☐ N/A
Did sealing material rise to surface?	☒ Yes	☐ No	☐ N/A
Did material settle after 24 hours?	☐ Yes	☒ No	☐ N/A
If yes, was hole retopped?	☐ Yes	☐ No	☐ N/A
If bentonite chips were used, were they hydrated with water from a known safe source?	☐ Yes	☒ No	☐ N/A

Required Method of Placing Sealing Material
☐ Conductor Pipe-Gravity ☐ Conductor Pipe-Pumped
☒ Screened & Poured (Bentonite Chips) ☐ Other (Explain): _____

Sealing Materials
☐ Neat Cement Grout ☐ Concrete
☐ Sand-Cement (Concrete) Grout ☒ Bentonite Chips

For Monitoring Wells and Monitoring Well Boreholes Only:
☒ Bentonite Chips ☐ Bentonite - Cement Grout
☐ Granular Bentonite ☐ Bentonite - Sand Slurry

5. Material Used to Fill Well / Drillhole

	From (ft.)	To (ft.)	No. Yards, Sacks Sealant or Volume (circle one)	Mix Ratio or Mud Weight
Bentonite Chips	Surface	15	1	

6. Comments

7. Supervision of Work

Name of Person or Firm Doing Filling & Sealing	License #	Date of Filling & Sealing or Verification (mm/dd/yyyy)
Geiss Soil Samples LLC		05/22/20

Street or Route: W4490 Pope Rd
Telephone Number: (715)539-3928
City: Merrill | State: WI | ZIP Code: 54452
Signature of Person Doing Work: Darrin Prentice
Date Signed: 5/22/20

DNR Use Only
Date Received | Noted By
Comments

State of Wis., Dept. of Natural Resources
dnr.wi.gov

Well / Drillhole / Borehole Filling & Sealing Report

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Route to DNR Bureau:
☐ Drinking Water ☐ Watershed/Wastewater ☐ Remediation/Redevelopment
☐ Waste Management ☐ Other: _____

1. Well Location Information

County	WI Unique Well # of Removed Well	Hicap #
Lincoln	_ _ _ _ _	

Latitude / Longitude (see instructions): _____ N _____ W
Format Code: ☐ DD ☐ DDM
Method Code: ☐ GPS008 ☐ SCR002 ☐ OTH001

¼ / ¼	¼	Section	Township	Range
or Gov't Lot #			N	☐ E ☐ W

Well Street Address: 2900 E Main St

Well City, Village or Town	Well ZIP Code
Merrill	54452

Subdivision Name	Lot #

Reason for Removal from Service	WI Unique Well # of Replacement Well
site closure	_ _ _ _ _

2. Facility / Owner Information

Facility Name: BMO Harris Bank
Facility ID (FID or PWS):
License/Permit/Monitoring #:
Original Well Owner:
Present Well Owner:
Mailing Address of Present Owner:

City of Present Owner	State	ZIP Code

3. Filled & Sealed Well / Drillhole / Borehole Information

☒ Monitoring Well MW-2
☐ Water Well
☐ Borehole / Drillhole

Original Construction Date (mm/dd/yyyy): 08/28/2019
If a Well Construction Report is available, please attach.

Construction Type:
☒ Drilled ☐ Driven (Sandpoint) ☐ Dug
☐ Other (specify): _____

Formation Type:
☒ Unconsolidated Formation ☐ Bedrock

Total Well Depth From Ground Surface (ft.)	Casing Diameter (in.)
16	2
Lower Drillhole Diameter (in.)	**Casing Depth (ft.)**
8.25	16

Was well annular space grouted? ☐ Yes ☒ No ☐ Unknown

If yes, to what depth (feet)?	Depth to Water (feet)

4. Pump, Liner, Screen, Casing & Sealing Material

Pump and piping removed?	☐ Yes	☐ No	☒ N/A
Liner(s) removed?	☐ Yes	☒ No	☐ N/A
Liner(s) perforated?	☐ Yes	☒ No	☐ N/A
Screen removed?	☐ Yes	☒ No	☐ N/A
Casing left in place?	☒ Yes	☐ No	☐ N/A
Was casing cut off below surface?	☒ Yes	☐ No	☐ N/A
Did sealing material rise to surface?	☒ Yes	☐ No	☐ N/A
Did material settle after 24 hours?	☐ Yes	☒ No	☐ N/A
If yes, was hole retopped?	☐ Yes	☐ No	☐ N/A
If bentonite chips were used, were they hydrated with water from a known safe source?	☐ Yes	☒ No	☐ N/A

Required Method of Placing Sealing Material
☐ Conductor Pipe-Gravity ☐ Conductor Pipe-Pumped
☒ Screened & Poured (Bentonite Chips) ☐ Other (Explain): _____

Sealing Materials
☐ Neat Cement Grout ☐ Concrete
☐ Sand-Cement (Concrete) Grout ☒ Bentonite Chips

For Monitoring Wells and Monitoring Well Boreholes Only:
☒ Bentonite Chips ☐ Bentonite - Cement Grout
☐ Granular Bentonite ☐ Bentonite - Sand Slurry

5. Material Used to Fill Well / Drillhole

	From (ft.)	To (ft.)	No. Yards, Sacks Sealant or Volume (circle one)	Mix Ratio or Mud Weight
Bentonite Chips	Surface	15	1	

6. Comments

7. Supervision of Work

Name of Person or Firm Doing Filling & Sealing	License #	Date of Filling & Sealing or Verification (mm/dd/yyyy)
Geiss Soil & Samples LLC		05/22/20

Street or Route	Telephone Number
W4490 Pope Rd	(715)539-3928

City	State	ZIP Code	Signature of Person Doing Work	Date Signed
Merrill	WI	54452	Darrin Prentice	5/22/20

DNR Use Only

Date Received	Noted By
Comments	

State of Wis., Dept. of Natural Resources
dnr.wi.gov

Well / Drillhole / Borehole Filling & Sealing Report

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1. Well Location Information

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Lincoln	_ _ _ _ _ _	

Latitude / Longitude (see instructions): _____ N, _____ W
Format Code: ☐ DD ☐ DDM
Method Code: ☐ GPS008 ☐ SCR002 ☐ OTH001

¼ / ¼	¼	Section	Township	Range
or Gov't Lot #			N	☐ E ☐ W

Well Street Address: 900 E Main St
Well City, Village or Town: Merrill
Well ZIP Code: 54452
Subdivision Name:
Lot #:
Reason for Removal from Service: site closure
WI Unique Well # of Replacement Well: _ _ _ _ _ _

2. Facility / Owner Information

Facility Name: BMO Harris Bank
Facility ID (FID or PWS):
License/Permit/Monitoring #:
Original Well Owner:
Present Well Owner:
Mailing Address of Present Owner:
City of Present Owner | State | ZIP Code

3. Filled & Sealed Well / Drillhole / Borehole Information

☒ Monitoring Well
☐ Water Well MW-3
☐ Borehole / Drillhole

Original Construction Date (mm/dd/yyyy): 08/28/2019
If a Well Construction Report is available, please attach.

Construction Type:
☒ Drilled ☐ Driven (Sandpoint) ☐ Dug
☐ Other (specify): _____

Formation Type:
☒ Unconsolidated Formation ☐ Bedrock

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If yes, to what depth (feet)?
Depth to Water (feet)

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Casing left in place?	☒ Yes	☐ No	☐ N/A
Was casing cut off below surface?	☒ Yes	☐ No	☐ N/A
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Material	From (ft.)	To (ft.)	No. Yards, Sacks Sealant or Volume (circle one)	Mix Ratio or Mud Weight
Bentonite Chips	Surface	15	1	

6. Comments

7. Supervision of Work

Name of Person or Firm Doing Filling & Sealing: Geiss Soil & Samples LLC
License #:
Date of Filling & Sealing or Verification (mm/dd/yyyy): 05/22/20
Street or Route: W4490 Pope Rd
Telephone Number: (715)539-3928
City: Merrill | State: WI | ZIP Code: 54452
Signature of Person Doing Work: Darrin Prentice
Date Signed: 5/22/20

DNR Use Only
Date Received | Noted By
Comments

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.
02-35-584409	

Parcel ID No.
25131061230020 and 25131061230021

FID No.	WTM Coordinates X	WTM Coordinates Y
	544599	523053

BRRTS Activity (Site) Name
BMO Harris Bank Branch

WTM Coordinates Represent: ☒ Source Area ☐ Parcel Center

Site Address	City	State	ZIP Code
900 E. Main Street	Merrill	WI	54452

Acres Ready For Use
1

Responsible Party (RP) Name
June Evans-Company Representative

Company Name
BMO Harris Bank, NA

Mailing Address	City	State	ZIP Code
111 West Monroe Street	Chicago	IL	60603

Phone Number	Email
(630) 981-1538	june.evans@bmo.com

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

Environmental Consultant Name
Patrick J. Patterson

Consulting Firm
Professional Service Industries, Inc

Mailing Address	City	State	ZIP Code
821 Corporate Court	Waukesha	WI	53189

Phone Number	Email
(262) 521-2125	patrick.patterson@intertek.com

Fees and Mailing of Closure Request

1. **Send a copy of page one** of this form and the applicable ch. NR 749, Wis. Adm. Code, fee(s) to the DNR Regional EPA (Environmental Program Associate) at **http://dnr.wi.gov/topic/Brownfields/Contact.html#tabx3**. Check all fees that apply:

   ☒ $1,050 Closure Fee

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

   ☒ $300 Database Fee for Soil

   Total Amount of Payment $ $1,350.00

   ☐ 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 Subject Property consists of an approximate 0.8-acre commercial property located at 900 E. Main Street in Merrill, Wisconsin. The Subject Property consists of two parcels and is situated within the Southwest 1/4 of Section 12, in Township 31 North, Range 6 East, in Lincoln County. The Subject Property has two property identification numbers; 25131061230020 and 25131061230021. The WTM91 coordinates for the general area of the contamination are 544582.33 and 523036.58, respectively (X and Y). The Latitude and Longitude for the general location of the area of concern is approximately 45° 10' 49.4" N and 89° 41' 13.87" W, respectively. A commercial structure is situated in the southwest portion of the parcel. A drive through structure is situated to the north of the building. Asphalt parking areas are generally located within the northern portion of the parcel. Landscaped areas are present in the southwest and northwest property corners.

The Subject Property is located to the north of E. Main Street, south of N. 1st Street, east of S. Mill Street, and west of several commercial properties and S. Poplar Street. The surrounding properties are generally occupied by commercial and residential properties and municipal facilities. The Wisconsin River is located about 400 feet to the south and the Prairie River, which flows into the Wisconsin River, is located about 1,200 feet to the west of the Subject Property.

B. Prior and current site usage: Specifically describe the current and historic occupancy and types of use.
Based upon the review of historical site information, a dry cleaning facility with a gasoline underground storage tank (UST) was indicated to be present in the north central portion of the Subject Property on the 1926 Sanborn Fire Insurance Map (Sanborn Map). In the 1948 and 1954 Sanborn Maps, an automotive repair facility is present in the southern portion of the eastern parking lot area. Currently the property is used as a bank.

C. Current zoning (e.g., industrial, commercial, residential) for the site and for neighboring properties, and how verified (Provide documentation in Attachment G).
commercial as verified via "Wiredata Corporation" and City Property Cards

D. Describe how and when site contamination was discovered.
The contamination was discovered during Phase II ESA activities performed on July 1, 2019.

E. Describe the type(s) and source(s) or suspected source(s) of contamination.
PAH and Cadmium contamination within fill soils associated with the property is at levels above current NR720 RCLs or NR720 BTV for Cadmium. Other contaminants (PVOCs and chlorinated compounds) were detected in the soil samples but are below current NR720 RCLs or are indicated by the analytical laboratory as estimated values and are not considered as accurate. Contaminants (PAHs and VOCs) were indicated to be present within water samples collected from the existing NR141 wells, but the detected levels are indicated by the analytical laboratory as estimated values and are not considered as accurate. The source of the fill soils is unknown. The sources of the other contaminants, which are indicated as laboratory estimated values, are anticipated to be from the former dry cleaners facility and the former gasoline UST.

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.
BMO Harris Bank Branch, BRRTS No. 02-35-584409 (open)

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

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 surface material at the probe locations consist of about 3 inches of asphalt pavement to topsoil fill material. The underlying fill to possible fill material consisting of brown, dark brown, yellowish brown to black silty sand, sandy silt to silt with gravel, wood and cinders extended to depths of about 4 to 6.5 feet below grade. The underlying natural soils encountered beneath the fill material to possible fill material consisted of brown to dark brown sandy silt, silty sand to sand with variable amounts of gravel to depths of about 10 to 15 feet below grade. No obvious evidence of contamination was present within any of the collected soil samples.

ii. Describe the composition, location and lateral extent, and depth of fill or waste deposits on the site.
The fill to possible fill material, which is present beneath the existing asphalt pavement and topsoil fill material, consisting of brown, dark brown, yellowish brown to black silty sand, sandy silt to silt with gravel, wood and cinders extended to depths of about 4 to 6.5 feet below grade. The fill material is anticipated to extends across the property and was most likely placed on the property and surrounding properties prior to the original development of this area of the City of Merrill.

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 site exploration activities and is believed to be present a depths ranging from about 50 to 100 feet below existing grade. The bedrock consists of igneous rock formations.

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).
Most of the property is covered with asphalt or concrete pavement. However, landscape areas are present in the northwest and southwest corners of the property as well as small areas near the drive-thru bank structure.

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.
Saturated soils were encountered at depths of about 11 to 12 feet below grade during probing activities. These saturated conditions were encountered in silty sand soils. The groundwater levels were measured within the monitoring wells on October 29, 2019 at depths ranging from 11.26 to 14.02 feet below top of casing (EL. 1252.09± to EL. 1252.42±). Based upon encountered subsurface conditions, the piezometric conditions were not evaluated as part of these site investigative activities. The groundwater flow is generally to the west/southwest towards the Prairie and Wisconsin Rivers. No obvious evidence of contamination was present within the collected water samples. No free product was encountered.

ii. Discuss groundwater flow direction(s), shallow and deep. Describe and explain flow variations, including fracture flow if present.
The shallow groundwater flow is generally to the west/southwest towards the Prairie and Wisconsin Rivers. The piezometric groundwater flow direction was not determined as part of these investigative activities.

iii. Discuss groundwater flow characteristics: hydraulic conductivity, flow rate and permeability, or state why this information was not obtained.
These flow characteristics were not necessary to complete the evaluation of the subsurface groundwater conditions and the presence of contamination. As such, they were not obtained. However, it is understood that the estimated hydraulic gradient within the glacial deposits within this area of north-central Wisconsin range from high permeable material to moderate permeable material. This is consistent with the subsurface soils encountered within the completed soil probes placed on the Subject Property, which were varying layers of native shallow sandy loam soils and deeper sand soils to the maximum depths explored. These deeper sand soils were the water bearing strata associated with property and the surrounding area.

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).
In conversations with a City of Merrill representative, no private potable wells are present on the subject property or surrounding properties. The representative also indicated that private potable wells are not allowed in the City of Merrill. Further, the City representative indicated that no municipal wells are present 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.
On July 1, 2019, four 15-foot soil probes were placed on the Subject Property in the general area of the former dry cleaners and the auto repair facility. Collected soil and grab water samples were tested for the presence of Volatile Organic Compounds (VOCs) and/or Polynuclear Aromatic Hydrocarbons (PAHs) and RCRA Metals. A Cadmium level was detected slightly above its current WDNR soil quality standard. A Lead level was detected slightly above its current WDNR groundwater quality standard, but was indicated to be a laboratory estimated value and not considered accurate. Few PAHs, which are above current WDNR soil quality standards, were encountered in one soil sample collected from the soil probes. PCE and Benzene, which are above current WDNR soil quality standards, were detected in a couple of the samples, but were indicated to be laboratory estimated values and not considered accurate. A PCE level was detected slightly above its current WDNR groundwater quality standard, but was indicated to be a laboratory estimated value and not considered accurate.

On August 28, 2019, eight additional soil probes extended to 10 to 15 feet were placed generally around the previous soil probes. Three of the probes were converted to NR141-compliant wells. Based upon the previous analytical test results, selected soil and groundwater samples were tested for the presence of VOCs and/or PAHs, and the RCRA

Metals Cadmium and Lead. Cadmium was not detected in any of the samples above soil quality standards. Several PAHs, which are above current WDNR soil quality standards, were encountered in soil samples collected from two of the soil probes. The VOC Benzene was also detected in one of the soil samples above soil quality standards but was indicated as a laboratory estimated value and is not considered accurate. PCE was detected in one of the water samples collected from the wells above its groundwater quality standards but was indicated as a laboratory estimated value and is not considered accurate. Lead was not detected above groundwater quality standards in any of the groundwater samples collected from the NR141 wells. The July and August 2019 exploration activities and laboratory test results were discussed in PSI's Supplemental Phase II ESA Report, dated September 20, 2019 and was submitted to the WDNR on December 17, 2019.

On October 29, 2019, five additional soil probes extended to 5 feet were placed generally around two of the previous soil probes to further evaluate the degree and extent of the PAH soil contamination. In addition, groundwater samples were collected from the three wells and were tested for the presence of VOCs and PAHs. One of the groundwater samples was also tested for the presence of Cadmium. The soil test results indicated a few PAH levels within one of the four soil samples above soil quality standards. PAHs were detected in the other samples but were below soil quality standards. The groundwater test results indicated PAHs present in one of the groundwater samples with two levels at concentrations slightly above groundwater quality standards but are indicated as laboratory estimated values and are not considered accurate. PCE was detected in one of the groundwater samples at a concentration slightly above its NR140 PAL but was indicated as a laboratory estimated value and is not considered accurate. Cadmium was not detected in the groundwater sample. These October 2019 exploration activities and laboratory test results, along with the previous activities, were discussed in PSI's Site Investigation Report, dated December 10, 2019 and was submitted to the WDNR on December 17, 2019.

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.

The encountered contamination associated with the property does not extend beyond the source property boundary.

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

The completed site investigative activities were not impeded by any of the existing structures present on the property.

B. Soil

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

Four (4) selected soil samples collected from the August 2019 soil probes (SP-1 through SP-4) were submitted for analytical testing. The selected samples collected from SP-1 and SP-2 (placed near the former auto repair facility) were tested for the presence of VOCs, PAHs and RCRA Metals. The selected samples collected from SP-3 and SP-4 (placed near the former dry cleaners/gasoline UST) were tested for the presence of VOCs. These samples were collected at intervals of 2 to 4 feet or 6 to 8 feet. Several RCRA Metals were detected in the selected soil samples collected from SP-1 and SP-2, but none of the detected concentrations were above current NR720 standards. The exception is a Cadmium concentration of 1.12 milligrams per kilograms (mg/kg), which is above its NR720 BTV of 1.0 mg/kg.

Several PAHs were detected in the selected soil sample collected from SP-1 that are at levels above NR720 standards. Benzo(a)pyrene was detected at a concentration of 0.71 milligrams per kilograms (mg/kg), which is above its NR720 non-industrial DC RCL of 0.115 mg/kg and its NR720 GW RCL of 0.470 mg/kg. Benzo(b)fluoranthene and Chrysene were detected at concentrations of 1.08 mg/kg and 0.84 mg/kg, respectively, which are above their respective NR720 GW RCLs of 0.4781 mg/kg and 0.1442 mg/kg. Dibenz(a,h)anthracene was detected at a concentration of 0.131 mg/kg, which is above its NR720 non-industrial DC RCL of 0.115 mg/kg. Other PAHs were detected in this sample and the selected soil sample collected from SP-2, but none of these detected concentrations were above current NR720 standards.

A few VOCs were detected in the selected soil samples collected from SP-2, SP-3, and SP-4 that are at levels above NR720 standards. Tetrachloroethene (PCE) was detected at concentrations of 0.07J mg/kg and 0.065J in the samples collected from SP-2 and SP-3, respectively, which are above its NR720 GW RCL of 0.0045 mg/kg. Benzene was detected at a concentration of 0.062J mg/kg in the sample collected from SP-4, which is above its NR720 GW RCL of 0.0051 mg/kg. The detected PCE and Benzene results were indicated as laboratory estimated values and are not considered accurate. Toluene was also detected in the sample collected from SP-4 but was not above NR720 standards. No other VOCs were detected in these samples or in the sample collected from SP-1.

Nine (9) selected soil samples collected from the August 2019 soil probes (SP-5 through SP-12), two of which were collected from SP-9, were submitted for analytical testing. Based upon the previous analytical test results, eight of the selected samples were tested for the presence of VOCs. The collected samples from SP-5 (2-4'), SP-6 (2-4'), and SP-9 (2-4') were tested for the presence of PAHs and the RCRA Metal Cadmium. Cadmium were detected at concentrations of 0.807 mg/kg, 0.124J mg/kg, and 0.122J mg/kg in the selected soil samples, respectively, but none of these detected

concentrations were above its NR720 BTV of 1.0 mg/kg.

Several PAHs were detected in the selected soil samples collected from SP-5, SP-6 and SP-9. However, only a few PAHs detected in SP-5 and SP-9 were at levels above NR720 standards. They consisted of Benzo(a)pyrene detected at a concentration of 0.61 mg/kg in SP-5, which is above its NR720 non-industrial (NI) DC RCL of 0.115 mg/kg and its NR720 GW RCL of 0.470 mg/kg and a Benzo(a)pyrene concentration of 2.15 mg/kg in SP-9, which is above its NR720 industrial DC RCL of 2.11 mg/kg. Chrysene was detected at concentrations of 0.75 mg/kg and 2.33 mg/kg in SP-5 and SP-9, respectively, which are above its NR720 GW RCL of 0.1442 mg/kg. Benzo(b)fluoranthene was detected at a concentration of 3.2 mg/kg in SP-9, which above its NR720 NI-DC RCL of 1.15 mg/kg and its NR720 GW RCL of 0.4781 mg/kg. Benzo(a)anthracene and Dibenz(a,h)anthracene were detected at concentrations of 2.22 mg/kg and 0.276 mg/kg in SP-9, respectively, which are above their respective NR720 non-industrial DC RCLs of 1.14 mg/kg and 0.115 mg/kg, respectively. Other PAHs were detected in these samples, but none of these detected concentrations were above current NR720 standards.

No VOCs were detected in the selected soil samples. The exception was several VOCs detected in the soil sample collected from SP-12. These detected compounds consisted of Benzene at a level of 0.072J mg/kg, Ethylbenzene at a level of 0.125 mg/kg, Naphthalene at a level of 0.52 mg/kg, n-Propylbenzene at a level of 0.041J mg/kg, Toluene at a level of 0.6 mg/kg, 1,2,4-Trimethylbenzene at a level of 0.223 mg/kg, 1,3,5-Trimethylbenzene at a level of 0.045J mg/kg, and Total Xylenes at a level of 0.87 mg/kg. Only the Benzene level is at a level above its NR720 GW RCL of 0.0051 mg/kg but it is indicated as a laboratory estimated value and is not considered as accurate.

Five (5) selected soil samples collected from the October 2019 soil probes (SP-13 through SP-17) were submitted for analytical testing. Based upon the previous analytical test results, the selected samples were tested for the presence of PAHs. Several PAHs were detected in the selected soil samples collected from SP-13, SP-14, SP-16 and SP-17. However, only a few PAHs detected in SP-14 were at levels above NR720 standards. They consisted of Benzo(a)pyrene detected at a concentration of 0.83 mg/kg, which is above its NR720 non-industrial (NI) DC RCL of 0.115 mg/kg and its NR720 GW RCL of 0.470 mg/kg and a Benzo(b)fluoranthene concentration of 1.17 mg/kg, which is above its NR720 NI-DC RCL of 1.15 mg/kg and its NR720 GW RCL of 0.4781 mg/kg. Chrysene was detected at a concentration of 0.91 mg/kg, which is above its NR720 GW RCL of 0.1442 mg/kg. Other PAHs were detected in these samples but none of these detected concentrations were above current NR720 standards.

The PAH contamination above NR720 soil quality standards is limited to the fill soils that are present within the upper 4 to 6.5 feet and is considered the source of the PAH contamination.

The other contaminants (PCE and Benzene) that are above NR720 soil quality standards have been indicated by the laboratory as estimated values and are not considered to be accurate. The sources of these two contaminants are believed to be the former dry cleaners and the gasoline UST, respectively.

The only utilities that cross the area of residual soil contamination are shallow (upper 12") private electrical lines.

ii. Describe the concentration(s) and types of soil contaminants found in the upper four feet of the soil column.
Four (4) selected soil samples collected from the August 2019 soil probes (SP-1 through SP-4) were submitted for analytical testing. The selected samples collected from SP-1 and SP-2 were tested for the presence of VOCs, PAHs and RCRA Metals. The selected samples collected from SP-3 and SP-4 were tested for the presence of VOCs. These samples were collected at intervals of 2 to 4 feet or 6 to 8 feet. Several RCRA Metals were detected in the selected soil samples collected from SP-1 and SP-2, but none of the detected concentrations were above current NR720 standards. The exception is a Cadmium concentration of 1.12 milligrams per kilograms (mg/kg), which is above its NR720 BTV of 1.0 mg/kg.

Several PAHs were detected in the selected soil sample collected from SP-1 that are at levels above NR720 standards. Benzo(a)pyrene was detected at a concentration of 0.71 milligrams per kilograms (mg/kg), which is above its NR720 non-industrial DC RCL of 0.115 mg/kg and its NR720 GW RCL of 0.470 mg/kg. Benzo(b)fluoranthene and Chrysene were detected at concentrations of 1.08 mg/kg and 0.84 mg/kg, respectively, which are above their respective NR720 GW RCLs of 0.4781 mg/kg and 0.1442 mg/kg. Dibenz(a,h)anthracene was detected at a concentration of 0.131 mg/kg, which is above its NR720 non-industrial DC RCL of 0.115 mg/kg. Other PAHs were detected in this sample and the selected soil sample collected from SP-2, but none of these detected concentrations were above current NR720 standards.

A few VOCs were detected in the selected soil samples collected from SP-2, SP-3, and SP-4 that are levels above NR720 standards. Tetrachloroethene (PCE) was detected at concentrations of 0.07J mg/kg and 0.065J in the samples collected from SP-2 and SP-3, respectively, which are above its NR720 GW RCL of 0.0045 mg/kg. Benzene was detected at a concentration of 0.062J mg/kg in the sample collected from SP-4, which is above its NR720 GW RCL of 0.0051 mg/kg. The detected PCE and Benzene results were indicated as laboratory estimated values and are not considered accurate. Toluene was also detected in the sample collected from SP-4 but was not above NR720 standards. No other VOCs were detected in these samples or in the sample collected from SP-1.

Nine (9) selected soil samples collected from the August 2019 soil probes (SP-5 through SP-12), two of which were

collected from SP-9, were submitted for analytical testing. Based upon the previous analytical test results, eight of the selected samples were tested for the presence of VOCs. The collected samples from SP-5 (2-4'), SP-6 (2-4'), and SP-9 (2-4') were tested for the presence of PAHs and the RCRA Metal Cadmium. Cadmium were detected at concentrations of 0.807 mg/kg, 0.124J mg/kg, and 0.122J mg/kg in the selected soil samples, respectively, but none of the detected concentrations were above its NR720 BTV of 1.0 mg/kg.

Several PAHs were detected in the selected soil samples collected from SP-5, SP-6 and SP-9. However, only a few PAHs detected in SP-5 and SP-9 were at levels above NR720 standards. They consisted of Benzo(a)pyrene detected at a concentration of 0.61 mg/kg in SP-5, which is above its NR720 non-industrial (NI) DC RCL of 0.115 mg/kg and its NR720 GW RCL of 0.470 mg/kg and a Benzo(a)pyrene concentration of 2.15 mg/kg in SP-9, which is above its NR720 industrial DC RCL of 2.11 mg/kg. Chrysene was detected at concentrations of 0.75 mg/kg and 2.33 mg/kg in SP-5 and SP-9, respectively, which are above its NR720 GW RCL of 0.1442 mg/kg. Benzo(b)fluoranthene was detected at a concentration of 3.2 mg/kg in SP-9, which above its NR720 NI-DC RCL of 1.15 mg/kg and its NR720 GW RCL of 0.4781 mg/kg. Benzo(a)anthracene and Dibenz(a,h)anthracene were detected at concentrations of 2.22 mg/kg and 0.276 mg/kg in SP-9, respectively, which are above their respective NR720 non-industrial DC RCLs of 1.14 mg/kg and 0.115 mg/kg, respectively. Other PAHs were detected in these samples, but none of these detected concentrations were above current NR720 standards.

No VOCs were detected in the selected soil samples. The exception was several VOCs detected in the soil sample collected from SP-12. These detected compounds consisted of Benzene at a level of 0.072J mg/kg, Ethylbenzene at a level of 0.125 mg/kg, Naphthalene at a level of 0.52 mg/kg, n-Propylbenzene at a level of 0.041J mg/kg, Toluene at a level of 0.6 mg/kg, 1,2,4-Trimethylbenzene at a level of 0.223 mg/kg, 1,3,5-Trimethylbenzene at a level of 0.045J mg/kg, and Total Xylenes at a level of 0.87 mg/kg. Only the Benzene level is at a level above its NR720 GW RCL of 0.0051 mg/kg but is indicated as a laboratory estimated value and is not considered as accurate.

Five (5) selected soil samples collected from the October 2019 soil probes (SP-13 through SP-17) were submitted for analytical testing. Based upon the previous analytical test results, the selected samples were tested for the presence of PAHs. Several PAHs were detected in the selected soil samples collected from SP-13, SP-14, SP-16 and SP-17. However, only a few PAHs detected in SP-14 were at levels above NR720 standards. They consisted of Benzo(a) pyrene detected at a concentration of 0.83 mg/kg, which is above its NR720 non-industrial (NI) DC RCL of 0.115 mg/kg and its NR720 GW RCL of 0.470 mg/kg and a Benzo(b)fluoranthene concentration of 1.17 mg/kg, which is above its NR720 NI-DC RCL of 1.15 mg/kg and its NR720 GW RCL of 0.4781 mg/kg. Chrysene was detected at a concentration of 0.91 mg/kg, which is above its NR720 GW RCL of 0.1442 mg/kg. Other PAHs were detected in these samples but none of these detected concentrations were above current NR720 standards.

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.

All contamination information presented is based upon the regulations established using s. NR 720.10 and s. NR 720.12

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 samples collected from wells MW-1 through MW-3 in August 2019 were tested for the presence of VOCs. In addition, the water sample from MW-1 was tested for the presence of dissolved Lead. No VOCs were detected in the samples. The exception was PCE, which was detected within all the collected samples. PCE was detected at concentrations of 0.42J ug/l, 0.58J ug/l to 0.38J ug/l. The PCE concentration of 0.58J ug/l detected in MW-2 is slightly above its NR140 PAL of 0.5 ug/l. The detected PCE results are indicated as laboratory estimated values and are not considered accurate. No dissolved Lead level was detected in the submitted sample from MW-1.

The groundwater samples collected from wells MW-1 through MW-3 in October 2019 were tested for the presence of VOCs and PAHs. In addition, the water sample from MW-1 was tested for the presence of dissolved Cadmium. No VOCs were detected in the samples, except a PCE concentration of 0.76J ug/l, which was detected within the collected sample from MW-2. This level is above its NR140 PAL of 0.5 ug/l, but well below their NR140 ESs of 0.2 ug/l. However, the detected PCE result is indicated as a laboratory estimated value and not considered accurate. A few PAHs were detected in the water sample collected from MW-1, while no PAHs were detected in the water samples collected from MW-2 and MW-3. Two of the detected PAHs were at levels slightly above their NR140 standards. They consisted of Benzo(b)fluoranthene detected at a concentration of 0.0214J ug/l and Chrysene detected at a concentration of 0.0269J ug/l, which are slightly above their NR140 PAL of 0.02 ug/l, but well below their NR140 ESs of 0.2 ug/l. Further, these concentrations were indicated as laboratory estimated values and not considered accurate. No dissolved Cadmium level was detected in the submitted sample from MW-1. No groundwater contamination above NR140 ESs is present on the property and only estimated values of PCE and two PAHs were indicated to be present in the

groundwater samples. No receptors/pathways are present in this area of the property and no potential impacts to water supply wells or drainage systems exist. The suspected sources would be the existing fill soils and the former dry cleaners/gasoline UST.

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.

No free product is present in the area of the groundwater monitoring wells.

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.

A vapor pathway assessment was not performed as part of the performed site investigative activities because only low levels of PCE and Benzene are present in shallow fill soils in isolated areas of the property and only a low level of PCE is present in the groundwater. These concentrations are also indicated to be laboratory estimated values that are not considered to be accurate. Also, no receptors/pathways are present in the area of this contamination. PAH contamination is present in the fill soils, but these contaminants are generally immobile compounds and are highly unlikely to migrate into the underlying groundwater or be present as vapors.

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

No vapor sampling was performed as part of these site investigative activities.

E. Surface Water and Sediment

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

Not applicable-no surface waters are present on the Subject Property

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

Not applicable-no surface waters are present on the Subject Property

4. Remedial Actions Implemented and Residual Levels at Closure

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

No remedial action was performed on the Subject Property

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

No immediate or interim actions have been taken on the Subject Property

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.

No active remedial actions have been taken on the Subject Property

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.

Evaluation of the "Green and Sustainable Remediation alternatives" were not performed for the Subject Property

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.

A Cadmium concentration of 1.12 milligrams per kilograms (mg/kg), which is above its NR720 BTV of 1.0 mg/kg, was detected in the sample collected from SP-1. Several PAHs were detected in the selected soil sample collected from SP-1 that are at levels above NR720 standards. Benzo(a)pyrene was detected at a concentration of 0.71 milligrams per kilograms (mg/kg), which is above its NR720 non-industrial DC RCL of 0.115 mg/kg and its NR720 GW RCL of 0.470 mg/kg. Benzo(b) fluoranthene and Chrysene were detected at concentrations of 1.08 mg/kg and 0.84 mg/kg, respectively, which are above their respective NR720 GW RCLs of 0.4781 mg/kg and 0.1442 mg/kg. Dibenz(a,h)anthracene was detected at a concentration of 0.131 mg/kg, which is above its NR720 non-industrial DC RCL of 0.115 mg/kg.

Benzo(a)pyrene was detected at a concentration of 0.61 mg/kg in SP-5, which is above its NR720 non-industrial (NI) DC RCL of 0.115 mg/kg and its NR720 GW RCL of 0.470 mg/kg and a Benzo(a)pyrene was detected at a concentration of 2.15 mg/kg in SP-9, which is above its NR720 industrial DC RCL of 2.11 mg/kg. Chrysene was detected at concentrations of

0.75 mg/kg and 2.33 mg/kg in SP-5 and SP-9, respectively, which are above its NR720 GW RCL of 0.1442 mg/kg. Benzo (b)fluoranthene was detected at a concentration of 3.2 mg/kg in SP-9, which above its NR720 NI-DC RCL of 1.15 mg/kg and its NR720 GW RCL of 0.4781 mg/kg. Benzo(a)anthracene and Dibenz(a,h)anthracene were detected at concentrations of 2.22 mg/kg and 0.276 mg/kg in SP-9, respectively, which are above their respective NR720 non-industrial DC RCLs of 1.14 mg/kg and 0.115 mg/kg, respectively.

In SP-14, Benzo(a)pyrene was detected at a concentration of 0.83 mg/kg, which is above its NR720 non-industrial (NI) DC RCL of 0.115 mg/kg and its NR720 GW RCL of 0.470 mg/kg and a Benzo(b)fluoranthene concentration of 1.17 mg/kg, which is above its NR720 NI-DC RCL of 1.15 mg/kg and its NR720 GW RCL of 0.4781 mg/kg. Chrysene was detected at a concentration of 0.91 mg/kg, which is above its NR720 GW RCL of 0.1442 mg/kg.

PCE was detected at concentrations of 0.07J mg/kg and 0.065J mg/kg in SP-2 and SP-3, respectively, which are above its NR720 GW RCL of 0.0045 mg/kg, but these concentrations are indicated by the laboratory as estimated values and are not considered to be accurate. Benzene was detected at concentrations of 0.062J mg/kg and 0.072J mg/kg in SP-4 and SP-12, respectively, which are above its NR720 GW RCL of 0.0051 mg/kg, but these concentrations are indicated by the laboratory as estimated values and are not considered to be accurate.

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.

Cadmium concentration of 1.12 milligrams per kilograms (mg/kg), which is above its NR720 BTV of 1.0 mg/kg in the sample collected from SP-1. A couple of PAHs were detected in the selected soil sample collected from SP-1 that are at levels above NR720 DC RCLs. Benzo(a)pyrene was detected at a concentration of 0.71 milligrams per kilograms (mg/kg), which is above its NR720 non-industrial DC RCL of 0.115 mg/kg. Dibenz(a,h)anthracene was detected at a concentration of 0.131 mg/kg, which is above its NR720 non-industrial DC RCL of 0.115 mg/kg.

Benzo(a)pyrene was detected at a concentration of 0.61 mg/kg in SP-5, which is above its NR720 non-industrial (NI) DC RCL of 0.115 mg/kg and a Benzo(a)pyrene concentration of 2.15 mg/kg was detected in SP-9, which is above its NR720 industrial DC RCL of 2.11 mg/kg. Benzo(b)fluoranthene was detected at a concentration of 3.2 mg/kg in SP-9, which above its NR720 NI-DC RCL of 1.15 mg/kg. Benzo(a)anthracene and Dibenz(a,h)anthracene were detected at concentrations of 2.22 mg/kg and 0.276 mg/kg in SP-9, respectively, which are above their respective NR720 non-industrial DC RCLs of 1.14 mg/kg and 0.115 mg/kg, respectively.

In SP-14, Benzo(a)pyrene was detected at a concentration of 0.83 mg/kg, which is above its NR720 non-industrial (NI) DC RCL of 0.115 mg/kg and a Benzo(b)fluoranthene concentration of 1.17 mg/kg was also detected, which is above its NR720 NI-DC RCL of 1.15 mg/kg.

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.

A couple of PAHs were detected in the selected soil sample collected from SP-1 that are at levels above NR720 GW standards. Benzo(a)pyrene was detected at a concentration of 0.71 milligrams per kilograms (mg/kg), which is above its NR720 GW RCL of 0.470 mg/kg. Benzo(b)fluoranthene and Chrysene were detected at concentrations of 1.08 mg/kg and 0.84 mg/kg, respectively, which are above their respective NR720 GW RCLs of 0.4781 mg/kg and 0.1442 mg/kg, respectively.

Benzo(a)pyrene was detected at a concentration of 0.61 mg/kg in SP-5and at a concentration of 2.15 mg/kg in SP-9, which are above its NR720 GW RCL of 0.470 mg/kg. Chrysene was detected at concentrations of 0.75 mg/kg and 2.33 mg/kg in SP-5 and SP-9, respectively, which are above its NR720 GW RCL of 0.1442 mg/kg. Benzo(b)fluoranthene was detected at a concentration of 3.2 mg/kg in SP-9, which is above its NR720 GW RCL of 0.4781 mg/kg.

In SP-14, Benzo(a)pyrene was detected at a concentration of 0.83 mg/kg, which is above its NR720 GW RCL of 0.470 mg/kg and a Benzo(b)fluoranthene concentration of 1.17 mg/kg was also detected, which is above its NR720 GW RCL of 0.4781 mg/kg. Chrysene was detected at a concentration of 0.91 mg/kg, which is above its NR720 GW RCL of 0.1442 mg/kg.

PCE was detected at concentrations of 0.07J mg/kg and 0.065J mg/kg in SP-2 and SP-3, respectively, which are above its NR720 GW RCL of 0.0045 mg/kg, but these concentrations are indicated by the laboratory as estimated values and are not considered to be accurate. Benzene was detected at concentrations of 0.062J mg/kg and 0.072J mg/kg in SP-4 and SP-12, respectively, which are above its NR720 GW RCL of 0.0051 mg/kg, but these concentrations are indicated by the laboratory as estimated values and are not considered to be accurate.

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 existing pavement will serve as a barrier to prevent direct human contact with residual soil contamination on the Subject Property that might otherwise pose a threat to human health. Any new buildings and paved surfaces will also act as partial infiltration barriers to minimize future soil-to-groundwater contamination migration that would violate the groundwater

standards in Ch. NR 140, WAC. Based on the current and future use of the Subject Property, these barriers should function as intended unless disturbed.

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).
Not Applicable- ES exceedances were not identified in the water samples collected from the NR141-compliant wells.

J. Identify how all exposure pathways (soil, groundwater, vapor) were removed and/or adequately addressed by immediate, interim and/or remedial action(s).
The direct contact and the soil to groundwater exposure pathways are addressed by the existing cover of asphalt pavement. In regards to the vapor exposure pathway, the residual soil contamination generally consists of PAH contaminants that are highly unlikely to migrate via soil vapors due to their low volatility. The few VOC contaminants detected were indicated by the laboratory as estimates and are not considered to be accurate values. Further, with the exception of shallow private electrical lines, no buried utilities are located in the area of the PAH contamination. As such, the vapor exposure pathway has been adequately addressed through the completed site investigation activities.

K. Identify any system hardware anticipated to be left in place after site closure, and explain the reasons why it will remain.
Not Applicable- no hardware will be left in place after site closure.

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.
The test results indicated the possible presence of PCE at concentrations slightly above its NR140 PAL in the samples collected from MW-2 and the possible presence of the PAHs Benzo(b)fluoranthene and Chrysene at concentrations slightly above their respective NR140 PALs in the sample collected from MW-1. However, these concentrations were indicated by the laboratory to be estimates and are not considered to be accurate values. There were no groundwater sample concentrations that exceeded the NR 140 ES. Thus, it is PSI's opinion that due to no ES exceedances and since the estimated PCE, Benzo(b)fluoranthene, and Chrysene levels are only slightly above their PALs, only a PAL exemption under NR 140.28(3) is warranted at this time.

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.
DNR action levels were not examined during the site investigation since only low levels of a few laboratory-estimated VOC concentrations were detected in the soil and groundwater samples. Further, no significant pathways (ie. water lines, sewer lines, natural gas lines, stormwater lines) are present in the area of the residual PAH soil contamination.

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- no surface water and/or sediment contamination concerns exist on the property.

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.

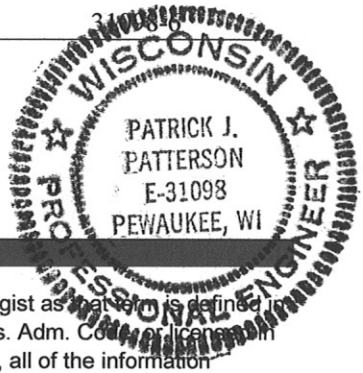
Engineering Certification

I, Patrick J. Patterson, 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 _____ P. E. # 31098-6

Title Project Manager

P.E. Stamp



Hydrogeologist Certification

I, Patrick J. Patterson, 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 _____

Title Project Manager Date 4/14/20

ATTACHMENT A

(Data Tables)

BRRTS No. 02-35-584409

BMO Harris Bank Branch
900 E. Main Street
Merrill, Wisconsin 54452

A.1. Groundwater Analytical Table (Page 1 of 2)

BMO Harris Bank Property
900 E. Main Street
Merrill, Wisconsin
BRRTS No. 02-35-584409

Analytical Parameter	Sample ID / Date	SP-1 7/1/2019	SP-2 7/1/2019	SP-3 7/1/2019	SP-4 7/1/2019	NR 140 ES	NR 140 PAL
	Units						
Detected VOCs							
Tetrachloroethene	ug/l	*0.51J*	0.46J	0.45J	0.46J	**5**	*0.5*
Detected PAHs							
Benzo(a)anthracene	ug/l	0.0176J	<0.0131	---	---	**---**	---
Benzo(b)fluoranthene	ug/l	0.0161J	<0.016	---	---	**0.2**	*0.02*
Benzo(g,h,i)perylene	ug/l	0.0306J	<0.0142	---	---	**---**	---
Benzo(k)fluoranthene	ug/l	0.0192J	<0.0146	---	---	**---**	---
Chrysene	ug/l	0.0183J	<0.0157	---	---	**0.2**	*0.02*
Dibenz(a,h)anthracene	ug/l	0.028J	<0.0173	---	---	**---**	---
Indeno(123-cd)pyrene	ug/l	0.0298J	<0.0121	---	---	**---**	---
Detected RCRA Metals							
Barium	ug/l	110	215	---	---	**2,000**	*400*
Chromium	ug/l	3.99J	<1.8	---	---	**100**	*10*
Lead	ug/l	*2.73J*	<2	---	---	**15**	*1.5*

Notes:

Bold concentrations exceed NR 140 ES
Italicized concentrations exceed NR 140 PAL
ES - NR 140 Enforcement Standard
PAL - NR 140 Preventive Action Limit
ug/l - micrograms per liter
J - concentration detected between the laboratory limit of detection and the limit of quantitation
--- - not analyzed/no standard established
PAH - polynuclear aromatic hydrocarbons
VOC - volatile organic compounds
RCRA - resource conservation and recovery act

A.1. Groundwater Analytical Table (Page 2 of 2)

BMO Harris Bank Property
900 E. Main Street
Merrill, Wisconsin
BRRTS No. 02-35-584409

Analytical Parameter	Sample ID / Date	MW-1 8/29/2019	MW-1 10/29/2019	MW-2 8/29/2019	MW-2 10/29/2019	MW-3 8/29/2019	MW-3 10/29/2019	NR 140 ES	NR 140 PAL
	Units								
Detected VOCs									
Tetrachloroethene	ug/l	0.42J	<0.38	*0.58J*	*0.76J*	0.38J	<0.38	**5**	*0.5*
Detected PAHs									
Benzo(a)anthracene	ug/l	---	0.0232J	---	<0.0131	---	<0.0131	---	---
Benzo(b)fluoranthene	ug/l	---	*0.0214J*	---	<0.016	---	<0.016	**0.2**	*0.02*
Benzo(k)fluoranthene	ug/l	---	0.0218J	---	<0.0146	---	<0.0146	---	---
Chrysene	ug/l	---	*0.0269J*	---	<0.0157	---	<0.0157	**0.2**	*0.02*
Fluoranthene	ug/l	---	0.0132J	---	<0.0088	---	<0.0088	**400**	*80*
Pyrene	ug/l	---	0.015J	---	<0.0121	---	<0.0121	**250**	*50*
Detected RCRA Metals									
Lead	ug/l	<2	---	---	---	---	---	**15**	*1.5*
Cadmium	ug/l	---	<0.4	---	---	---	---	**5**	*0.5*

Notes:

Bold concentrations exceed NR 140 ES
Italicized concentrations exceed NR 140 PAL
ES - NR 140 Enforcement Standard
PAL - NR 140 Preventive Action Limit
ug/l - micrograms per liter
--- - not analyzed/no standard established
VOCs - volatile organic compounds
PAHs - polynuclear aromatic hydrocarbons

A.2. Soil Analytical Results Table (Page 1 of 4)

BMO Harris Bank Property
900 E. Main Street
Merrill, Wisconsin
BRRTS No. 02-35-584409

Analytical Parameter	Location / Depth / Date / Units	SP-1 2-4' 7/1/2019	SP-2 2-4' 7/1/2019	SP-3 6-8' 7/1/2019	SP-4 2-4' 7/1/2019	NR 720 RCL			NR720
saturated/unsaturated		u	u	u	u	Direct Contact	Direct Contact	Groundwater	BTV
PID	i.u.	0	0	0	0	Non-Industrial	Industrial	Pathway	
Detected VOCs									
Benzene	mg/kg	<0.03	<0.03	<0.03	*0.062J*	**1.6**	7.07	*0.0051*	---
Tetrachloroethene	mg/kg	<0.032	*0.07J*	*0.065J*	<0.032	**33**	145	*0.0045*	---
Toluene	mg/kg	<0.032	<0.032	<0.032	0.038J	**818**	818	*1,107.2*	---
Detected PAHs									
Acenaphthene	mg/kg	0.048J	<0.0163	---	---	**3,590**	45,200	---	
Acenaphthylene	mg/kg	0.0213J	0.0094J	---	---	**---**	---	---	---
Anthracene	mg/kg	0.199	0.0113J	---	---	**17,900**	100,000	*196.9492*	---
Benzo(a)anthracene	mg/kg	0.75	0.07	---	---	**1.14**	20.8	---	---
Benzo(a)pyrene	mg/kg	***0.71***	0.071	---	---	**0.115**	2.11	*0.470*	---
Benzo(b)fluoranthene	mg/kg	*1.08*	0.101	---	---	**1.15**	21.1	*0.4781*	---
Benzo(g,h,i)perylene	mg/kg	0.69	0.068	---	---	**---**	---	---	---
Benzo(k)fluoranthene	mg/kg	0.39	0.043	---	---	**11.5**	211	---	---
Chrysene	mg/kg	*0.84*	0.085	---	---	**115**	2,110	*0.1442*	---
Dibenz(a,h)anthracene	mg/kg	**0.131**	0.0157J	---	---	**0.115**	2.11	---	---
Fluoranthene	mg/kg	2.45	0.145	---	---	**2,390**	30,100	*88.8778*	---
Fluorene	mg/kg	0.057	<0.0086	---	---	**2,390**	30,100	*14.8299*	---
Indeno(1,2,3-cd)pyrene	mg/kg	0.57	0.056	---	---	**1.15**	21.1	---	---
Phenanthrene	mg/kg	1.11	0.053	---	---	**---**	---	---	---
Pyrene	mg/kg	1.95	0.154	---	---	**1,790**	22,600	*54.5455*	---
Detected RCRA Metals									
Arsenic	mg/kg	2.06	1.37J	---	---	**0.677**	3	*0.584*	(8)
Barium	mg/kg	84.1	79.8	---	---	**15,300**	100,000	*164.8*	(364)
Cadmium	mg/kg	(1.12)	0.081J	---	---	**71.1**	985	*0.752*	(1)
Chromium (a)	mg/kg	16.7	9.21	---	---	**(b)**	(b)	*360,000 (c)*	(44) (d)
Lead	mg/kg	37.4	25.1	---	---	**400**	800	*27*	(52)
Mercury	mg/kg	0.113	0.144	---	---	**3.13**	3.13	*0.208*	---
Cumulative Harzard Index		0.0752	0.0239	0.0104	0.0104	**---**	---	---	---
Cumulative Cancer Risk		9.9E-06	1.4E-06	4.3E-07	4.5E-07	**---**	**---**	---	---

Notes:

Bold concentrations exceed NR 720 non-industrial direct contact RCLs
Boxed concentrations exceed NR 720 industrial direct contact RCLs
Italicized concentrations exceed NR 720 groundwater pathway RCLs
Concentrations in parenthises exceed NR 720 BTV
--- Not analyzed/Not Established
RCL - residual contaminant level
BTV = Background Threshold Value

PID = Photoionization Detector
S/U = Sample Saturated/Unsaturated
i.u. - instrument units
PAH - polynuclear aromatic hydrocarbons
VOC - volatile organic compounds
mg/kg -milligrams per kilogram

J - concentration detected between the laboratory Limit of Detection and the Limit of Quantitation
a: Total Chromium laboratory analytical results may be comprised of trivalent chromium (Cr III) and/or hexavalent chromium (Cr VI)
b: DC RCLs for Chromium VI are 0.301 (NI) and 6.36 mg/kg (I) and DC RCL for Chromium III is 100,000 mg/kg
c: use 360,000 mg/kg for GW RCL, if no CR-VI is present
d: BTV applies to Total Chromium = CR-III and CR-VI

A.2. Soil Analytical Results Table (Page 2 of 4)

BMO Harris Bank Property
900 E. Main Street
Merrill, Wisconsin
BRRTS No. 02-35-584409

Analytical Parameter	Location / Depth / Date / Units	SP-5 2-4' 8/28/2019	SP-6 2-4' 8/28/2019	SP-7 2-4' 8/28/2019	SP-8 6-8' 8/28/2019	NR 720 RCL			NR720
saturated/unsaturated		u	u	u	u	Direct Contact Non-Industrial	Direct Contact Industrial	Groundwater Pathway	BTV
PID	i.u.	0	0	0	0				
Detected VOCs									
Benzene	mg/kg	<0.03	<0.03	<0.03	<0.03	**1.6**	7.07	*0.0051*	---
Tetrachloroethene	mg/kg	<0.032	<0.032	<0.032	<0.032	**33**	145	*0.0045*	---
Toluene	mg/kg	<0.032	<0.032	<0.032	<0.032	**818**	818	*1,107.2*	---
Detected PAHs									
Acenaphthene	mg/kg	<0.0163	<0.0163	---	---	**3,590**	45,200	---	---
Acenaphthylene	mg/kg	0.047	<0.0086	---	---	**---**	---	---	---
Anthracene	mg/kg	0.1	<0.0043	---	---	**17,900**	100,000	*196.9492*	---
Benzo(a)anthracene	mg/kg	0.51	<0.016	---	---	**1.14**	20.8	---	---
Benzo(a)pyrene	mg/kg	***0.61***	<0.0124	---	---	**0.115**	2.11	*0.470*	---
Benzo(b)fluoranthene	mg/kg	*1.05*	<0.0109	---	---	**1.15**	21.1	*0.4781*	---
Benzo(g,h,i)perylene	mg/kg	0.43	<0.0084	---	---	**---**	---	---	---
Benzo(k)fluoranthene	mg/kg	0.309	<0.0091	---	---	**11.5**	211	---	---
Chrysene	mg/kg	*0.75*	<0.006	---	---	**115**	2,110	*0.1442*	---
Dibenz(a,h)anthracene	mg/kg	0.091	<0.0101	---	---	**0.115**	2.11	---	---
Fluoranthene	mg/kg	1.74	0.0067J	---	---	**2,390**	30,100	*88.8778*	---
Fluorene	mg/kg	0.0244J	<0.0086	---	---	**2,390**	30,100	*14.8299*	---
Indeno(1,2,3-cd)pyrene	mg/kg	0.36	<0.0082	---	---	**1.15**	21.1	---	---
1-Methyl naphthalene	mg/kg	0.0105J	<0.0086	---	---	**17.6**	72.7	---	---
Phenanthrene	mg/kg	0.63	<0.0071	---	---	**---**	---	---	---
Pyrene	mg/kg	1.41	0.0095J	---	---	**1,790**	22,600	*54.5455*	---
Detected RCRA Metals									
Arsenic	mg/kg	---	---	---	---	**0.677**	3	*0.584*	(8)
Barium	mg/kg	---	---	---	---	**15,300**	100,000	*164.8*	(364)
Cadmium	mg/kg	0.807	0.124J	---	---	**71.1**	985	*0.752*	(1)
Chromium (a)	mg/kg	---	---	---	---	**(b)**	(b)	*360,000 (c)*	(44) (d)
Lead	mg/kg	---	---	---	---	**400**	800	*27*	(52)
Mercury	mg/kg	---	---	---	---	**3.13**	3.13	*0.208*	---
Cumulative Harzard Index		0.046	0.0109	0.0101	0.0101	**---**	---	---	---
Cumulative Cancer Risk		8.2E-06	6.6E-07	4.3E-07	4.5E-07	**---**	**---**	---	---

Notes:

Bold concentrations exceed NR 720 non-industrial direct contact RCLs
Boxed concentrations exceed NR 720 industrial direct contact RCLs
Italicized concentrations exceed NR 720 groundwater pathway RCLs
Concentrations in parenthises exceed NR 720 BTV
--- Not analyzed/Not Established
RCL - residual contaminant level
BTV = Background Threshold Value
PID = Photoionization Detector
S/U = Sample Saturated/Unsaturated
i.u. - instrument units
PAH - polynuclear aromatic hydrocarbons
VOC - volatile organic compounds
mg/kg -milligrams per kilogram

J - concentration detected between the laboratory Limit of Detection and the Limit of Quantitation
a: Total Chromium laboratory analytical results may be comprised of trivalent chromium (Cr III) and/or hexavalent chromium (Cr VI)
b: DC RCLs for Chromium VI are 0.301 (NI) and 6.36 mg/kg (I) and DC RCL for Chromium III is 100,000 mg/kg
c: use 360,000 mg/kg for GW RCL, if no CR-VI is present
d: BTV applies to Total Chromium = CR-III and CR-VI

A.2. Soil Analytical Results Table (Page 3 of 4)

BMO Harris Bank Property
900 E. Main Street
Merrill, Wisconsin
BRRTS No. 02-35-584409

Analytical Parameter	Location / Depth / Date / Units	SP-9 2-4' 8/28/2019	SP-9 6-8' 8/28/2019	SP-10 2-4' 8/28/2019	SP-11 2-4' 8/28/2019	SP-12 2-4' 8/28/2019	NR 720 RCL			NR720
saturated/unsaturated		u	u	u	u	u	Direct Contact	Direct Contact	Groundwater	BTV
PID	i.u.	0	0	0	0	0	Non-Industrial	Industrial	Pathway	
Detected VOCs										
Benzene	mg/kg	---	<0.03	<0.03	<0.03	*0.072J*	**1.6**	7.07	*0.0051*	---
Ethylbenzene	mg/kg	---	<0.035	<0.035	<0.035	0.125	**8.02**	35.4	*1.57*	---
Naphthalene	mg/kg	---	<0.094	<0.094	<0.094	0.52	**5.52**	24.1	*0.6582*	---
n-Propylbenzene	mg/kg	---	<0.033	<0.033	<0.033	0.041J	**264**	264	---	---
Tetrachloroethene	mg/kg	---	<0.032	<0.032	<0.032	<0.032	**33**	145	*0.0045*	---
Toluene	mg/kg	---	<0.032	<0.032	<0.032	0.6	**818**	818	*1,107.2*	---
1,2,4-TMB	mg/kg	---	<0.025	<0.025	<0.025	0.223	**219**	219	*1.3821*	---
1,3,5-TMB	mg/kg	---	<0.032	<0.032	<0.032	0.045J	**182**	182		---
Total Xylenes	mg/kg	---	<0.116	<0.116	<0.116	0.87	260	260	3.96	---
Detected PAHs										
Acenaphthene	mg/kg	0.144	---	---	---	---	**3,590**	45,200	---	
Acenaphthylene	mg/kg	0.0182J	---	---	---	---	**---**	---	---	---
Anthracene	mg/kg	0.7	---	---	---	---	**17,900**	100,000	*196.9492*	---
Benzo(a)anthracene	mg/kg	**2.22**	---	---	---	---	**1.14**	20.8	---	---
Benzo(a)pyrene	mg/kg	***2.15***	---	---	---	---	**0.115**	2.11	*0.470*	---
Benzo(b)fluoranthene	mg/kg	***3.2***	---	---	---	---	**1.15**	21.1	*0.4781*	---
Benzo(g,h,i)perylene	mg/kg	1.21	---	---	---	---	**---**	---	---	---
Benzo(k)fluoranthene	mg/kg	1.07	---	---	---	---	**11.5**	211	---	---
Chrysene	mg/kg	*2.33*	---	---	---	---	**115**	2,110	*0.1442*	---
Dibenz(a,h)anthracene	mg/kg	**0.276**	---	---	---	---	**0.115**	2.11	---	---
Fluoranthene	mg/kg	6.5	---	---	---	---	**2,390**	30,100	*88.8778*	---
Fluorene	mg/kg	0.214	---	---	---	---	**2,390**	30,100	*14.8299*	---
Indeno(1,2,3-cd)pyrene	mg/kg	1.08	---	---	---	---	**1.15**	21.1	---	---
1-Methyl naphthalene	mg/kg	0.009J	---	---	---	---	**17.6**	72.7	---	---
Phenanthrene	mg/kg	3.4	---	---	---	---	**---**	---	---	---
Pyrene	mg/kg	5.2	---	---	---	---	**1,790**	22,600	*54.5455*	---
Detected RCRA Metals										
Arsenic	mg/kg	---	---	---	---	---	**0.677**	3	*0.584*	(8)
Barium	mg/kg	---	---	---	---	---	**15,300**	100,000	*164.8*	(364)
Cadmium	mg/kg	0.122J	---	---	---	---	**71.1**	985	*0.752*	(1)
Chromium (a)	mg/kg	---	---	---	---	---	**(b)**	(b)	*360,000 (c)*	(44) (d)
Lead	mg/kg	---	---	---	---	---	**400**	800	*27*	(52)
Mercury	mg/kg	---	---	---	---	---	**3.13**	3.13	*0.208*	---
Cumulative Harzard Index		0.1267	0.0101	0.0101	0.0101	0.0146	**---**	---	---	---
Cumulative Cancer Risk		2.7E-05	4.3E-07	4.3E-07	4.3E-07	5.5E-07	**---**	**---**	---	---

Notes:

Bold concentrations exceed NR 720 non-industrial direct contact RCLs
Boxed concentrations exceed NR 720 industrial direct contact RCLs
Italicized concentrations exceed NR 720 groundwater pathway RCLs
Concentrations in parenthises exceed NR 720 BTV
--- Not analyzed/Not Established
RCL - residual contaminant level
BTV = Background Threshold Value

PID = Photoionization Detector
S/U = Sample Saturated/Unsaturated
i.u. - instrument units
PAH - polynuclear aromatic hydrocarbons
VOC - volatile organic compounds
mg/kg -milligrams per kilogram

J - concentration detected between the laboratory Limit of Detection and the Limit of Quantitation
a: Total Chromium laboratory analytical results may be comprised of trivalent chromium (Cr III) and/or hexavalent chromium (Cr VI)
b: DC RCLs for Chromium VI are 0.301 (NI) and 6.36 mg/kg (I) and DC RCL for Chromium III is 100,000 mg/kg
c: use 360,000 mg/kg for GW RCL, if no CR-VI is present
d: BTV applies to Total Chromium = CR-III and CR-VI

A.2. Soil Analytical Results Table (Page 4 of 4)

BMO Harris Bank Property
900 E. Main Street
Merrill, Wisconsin
BRRTS No. 02-35-584409

Analytical Parameter	Location / Depth / Date / Units	SP-13 2-4' 10/29/2019	SP-14 2-4' 10/29/2019	SP-15 2-4' 10/29/2019	SP-16 2-4' 10/29/2019	SP-17 2-4' 10/29/2019	NR 720 RCL		
saturated/unsaturated		u	u	u	u	u	Direct Contact Non-Industrial	Direct Contact Industrial	Groundwater Pathway
PID	i.u.	0	0	0	0	0			
Detected PAHs									
Acenaphthene	mg/kg	<0.0163	0.265	<0.0163	<0.0163	<0.0163	**3,590**	45,200	---
Acenaphthylene	mg/kg	<0.0086	0.0134J	<0.0086	0.0151J	<0.0086	**---**	---	---
Anthracene	mg/kg	<0.0043	0.62	<0.0043	0.014	<0.0043	**17,900**	100,000	*196.9492*
Benzo(a)anthracene	mg/kg	<0.016	1.02	<0.016	0.059	<0.016	**1.14**	20.8	---
Benzo(a)pyrene	mg/kg	<0.0124	***0.83***	<0.0124	0.067	<0.0124	**0.115**	2.11	*0.470*
Benzo(b)fluoranthene	mg/kg	0.0239J	***1.17***	<0.0109	0.099	0.0154J	**1.15**	21.1	*0.4781*
Benzo(g,h,i)perylene	mg/kg	0.013J	0.36	<0.0084	0.042	<0.0084	**---**	---	---
Benzo(k)fluoranthene	mg/kg	0.0125J	0.43	<0.0091	0.044	<0.0091	**11.5**	211	---
Chrysene	mg/kg	0.0174J	*0.91*	<0.006	0.069	0.0133J	**115**	2,110	*0.1442*
Dibenz(a,h)anthracene	mg/kg	<0.0101	0.088	<0.0101	<0.0101	<0.0101	**0.115**	2.11	---
Fluoranthene	mg/kg	0.0212	2.47	<0.0054	0.102	0.0223	**2,390**	30,100	*88.8778*
Fluorene	mg/kg	<0.0086	0.27	<0.0086	<0.0086	<0.0086	**2,390**	30,100	*14.8299*
Indeno(1,2,3-cd)pyrene	mg/kg	0.0087J	0.34	<0.0082	0.032	<0.0082	**1.15**	21.1	---
1-Methyl naphthalene	mg/kg	<0.0086	0.052	<0.0086	<0.0086	<0.0086	**17.6**	72.7	---
2-Methyl naphthalene	mg/kg	<0.0147	0.036J	<0.0147	<0.0147	<0.0147	**239.0**	3,010	---
Naphthalene	mg/kg	<0.0153	0.043J	<0.0153	<0.0153	<0.0153	**5.5**	24.1	*0.6582*
Phenanthrene	mg/kg	0.0102J	2.37	<0.0071	0.051	0.0156J	**---**	---	---
Pyrene	mg/kg	0.0228	2.07	<0.0067	0.109	0.0198J	**1,790**	22,600	*54.5455*
Cumulative Harzard Index		0.0009	0.0494	0.0009	0.004	0.0009	**---**	---	---
Cumulative Cancer Risk		2.4E-07	1.0E-05	2.3E-07	8.4E-07	2.3E-07	**---**	**---**	---

Notes:

Bold concentrations exceed NR 720 non-industrial direct contact RCLs
Boxed concentrations exceed NR 720 industrial direct contact RCLs
Italicized concentrations exceed NR 720 groundwater pathway RCLs
--- Not analyzed/Not Established
mg/kg -milligrams per kilogram
RCL - residual contaminant level
J - concentration detected between the laboratory Limit of Detection and the Limit of Quantitation

PID = Photoionization Detector
S/U = Sample Saturated/Unsaturated
i.u. - instrument units
PAH - polynuclear aromatic hydrocarbons

A.3. ResidualSoil Contamination Table (Page 1 of 4)

BMO Harris Bank Property
900 E. Main Street
Merrill, Wisconsin
BRRTS No. 02-35-584409

Analytical Parameter	Location / Depth / Date / Units	SP-1 2-4' 7/1/2019	SP-2 2-4' 7/1/2019	SP-3 6-8' 7/1/2019	SP-4 2-4' 7/1/2019	NR 720 RCL			NR720
saturated/unsaturated		u	u	u	u	Direct Contact	Direct Contact	Groundwater	BTV
PID	i.u.	0	0	0	0	Non-Industrial	Industrial	Pathway	
Detected VOCs									
Benzene	mg/kg				*0.062J*	**1.6**	7.07	*0.0051*	---
Tetrachloroethene	mg/kg		*0.07J*	*0.065J*		**33**	145	*0.0045*	---
Toluene	mg/kg				0.038J	**818**	818	*1,107.2*	---
Detected PAHs									
Acenaphthene	mg/kg			---	---	**3,590**	45,200	---	
Acenaphthylene	mg/kg			---	---	**---**	---	---	---
Anthracene	mg/kg			---	---	**17,900**	100,000	*196.9492*	---
Benzo(a)anthracene	mg/kg			---	---	**1.14**	20.8	---	---
Benzo(a)pyrene	mg/kg	***0.71***		---	---	**0.115**	2.11	*0.470*	---
Benzo(b)fluoranthene	mg/kg	*1.08*		---	---	**1.15**	21.1	*0.4781*	---
Benzo(g,h,i)perylene	mg/kg			---	---	**---**	---	---	---
Benzo(k)fluoranthene	mg/kg			---	---	**11.5**	211	---	---
Chrysene	mg/kg	*0.84*		---	---	**115**	2,110	*0.1442*	---
Dibenz(a,h)anthracene	mg/kg	**0.131**		---	---	**0.115**	2.11	---	---
Fluoranthene	mg/kg			---	---	**2,390**	30,100	*88.8778*	---
Fluorene	mg/kg			---	---	**2,390**	30,100	*14.8299*	---
Indeno(1,2,3-cd)pyrene	mg/kg			---	---	**1.15**	21.1	---	---
Phenanthrene	mg/kg			---	---	**---**	---	---	---
Pyrene	mg/kg			---	---	**1,790**	22,600	*54.5455*	---
Detected RCRA Metals									
Arsenic	mg/kg			---	---	**0.677**	3	*0.584*	(8)
Barium	mg/kg			---	---	**15,300**	100,000	*164.8*	(364)
Cadmium	mg/kg	(1.12)		---	---	**71.1**	985	*0.752*	(1)
Chromium (a)	mg/kg			---	---	**(b)**	(b)	*360,000 (c)*	(44) (d)
Lead	mg/kg			---	---	**400**	800	*27*	(52)
Mercury	mg/kg			---	---	**3.13**	3.13	*0.208*	---
Cumulative Harzard Index		0.0752	0.0239	0.0104	0.0104	**---**	---	---	---
Cumulative Cancer Risk		9.9E-06	1.4E-06	4.3E-07	4.5E-07	**---**	**---**	---	---

Notes:

Bold concentrations exceed NR 720 non-industrial direct contact RCLs
Boxed concentrations exceed NR 720 industrial direct contact RCLs
Italicized concentrations exceed NR 720 groundwater pathway RCLs
Concentrations in parenthises exceed NR 720 BTV
--- Not analyzed/Not Established
RCL - residual contaminant level
BTV = Background Threshold Value

PID = Photoionization Detector
S/U = Sample Saturated/Unsaturated
i.u. - instrument units
PAH - polynuclear aromatic hydrocarbons
VOC - volatile organic compounds
mg/kg -milligrams per kilogram

J - concentration detected between the laboratory Limit of Detection and the Limit of Quantitation
a: Total Chromium laboratory analytical results may be comprised of trivalent chromium (Cr III) and/or hexavalent chromium (Cr VI)
b: DC RCLs for Chromium VI are 0.301 (NI) and 6.36 mg/kg (I) and DC RCL for Chromium III is 100,000 mg/kg
c: use 360,000 mg/kg for GW RCL, if no CR-VI is present
d: BTV applies to Total Chromium = CR-III and CR-VI

A.3. ResidualSoil Contamination Table (Page 2 of 4)

BMO Harris Bank Property
900 E. Main Street
Merrill, Wisconsin
BRRTS No. 02-35-584409

Analytical Parameter	Location / Depth / Date / Units	SP-5 2-4' 8/28/2019	SP-6 2-4' 8/28/2019	SP-7 2-4' 8/28/2019	SP-8 6-8' 8/28/2019	NR 720 RCL			NR720
saturated/unsaturated		u	u	u	u	Direct Contact Non-Industrial	Direct Contact Industrial	Groundwater Pathway	BTV
PID	i.u.	0	0	0	0				
Detected VOCs									
Benzene	mg/kg					**1.6**	7.07	*0.0051*	---
Tetrachloroethene	mg/kg					**33**	145	*0.0045*	---
Toluene	mg/kg					**818**	818	*1,107.2*	---
Detected PAHs									
Acenaphthene	mg/kg			---	---	**3,590**	45,200	---	---
Acenaphthylene	mg/kg			---	---	**---**	---	---	---
Anthracene	mg/kg			---	---	**17,900**	100,000	*196.9492*	---
Benzo(a)anthracene	mg/kg			---	---	**1.14**	20.8	---	---
Benzo(a)pyrene	mg/kg	***0.61***		---	---	**0.115**	2.11	*0.470*	---
Benzo(b)fluoranthene	mg/kg	*1.05*		---	---	**1.15**	21.1	*0.4781*	---
Benzo(g,h,i)perylene	mg/kg			---	---	**---**	---	---	---
Benzo(k)fluoranthene	mg/kg			---	---	**11.5**	211	---	---
Chrysene	mg/kg	*0.75*		---	---	**115**	2,110	*0.1442*	---
Dibenz(a,h)anthracene	mg/kg			---	---	**0.115**	2.11	---	---
Fluoranthene	mg/kg			---	---	**2,390**	30,100	*88.8778*	---
Fluorene	mg/kg			---	---	**2,390**	30,100	*14.8299*	---
Indeno(1,2,3-cd)pyrene	mg/kg			---	---	**1.15**	21.1	---	---
1-Methyl naphthalene	mg/kg			---	---	**17.6**	72.7	---	---
Phenanthrene	mg/kg			---	---	**---**	---	---	---
Pyrene	mg/kg			---	---	**1,790**	22,600	*54.5455*	---
Detected RCRA Metals									
Arsenic	mg/kg	---	---	---	---	**0.677**	3	*0.584*	(8)
Barium	mg/kg	---	---	---	---	**15,300**	100,000	*164.8*	(364)
Cadmium	mg/kg			---	---	**71.1**	985	*0.752*	(1)
Chromium (a)	mg/kg	---	---	---	---	**(b)**	(b)	*360,000 (c)*	(44) (d)
Lead	mg/kg	---	---	---	---	**400**	800	*27*	(52)
Mercury	mg/kg	---	---	---	---	**3.13**	3.13	*0.208*	---
Cumulative Harzard Index		0.046	0.0109	0.0101	0.0101	**---**	---	---	---
Cumulative Cancer Risk		8.2E-06	6.6E-07	4.3E-07	4.5E-07	**---**	**---**	---	---

Notes:

Bold concentrations exceed NR 720 non-industrial direct contact RCLs
Boxed concentrations exceed NR 720 industrial direct contact RCLs
Italicized concentrations exceed NR 720 groundwater pathway RCLs
Concentrations in parenthises exceed NR 720 BTV
--- Not analyzed/Not Established
RCL - residual contaminant level
BTV = Background Threshold Value
PID = Photoionization Detector
S/U = Sample Saturated/Unsaturated
i.u. - instrument units
PAH - polynuclear aromatic hydrocarbons
VOC - volatile organic compounds
mg/kg -milligrams per kilogram

J - concentration detected between the laboratory Limit of Detection and the Limit of Quantitation
a: Total Chromium laboratory analytical results may be comprised of trivalent chromium (Cr III) and/or hexavalent chromium (Cr VI)
b: DC RCLs for Chromium VI are 0.301 (NI) and 6.36 mg/kg (I) and DC RCL for Chromium III is 100,000 mg/kg
c: use 360,000 mg/kg for GW RCL, if no CR-VI is present
d: BTV applies to Total Chromium = CR-III and CR-VI

A.3. ResidualSoil Contamination Table (Page 3 of 4)

BMO Harris Bank Property
900 E. Main Street
Merrill, Wisconsin
BRRTS No. 02-35-584409

Analytical Parameter	Location / Depth / Date	SP-9 2-4' 8/28/2019	SP-9 6-8' 8/28/2019	SP-10 2-4' 8/28/2019	SP-11 2-4' 8/28/2019	SP-12 2-4' 8/28/2019	NR 720 RCL			NR720
	Units						Direct Contact Non-Industrial	Direct Contact Industrial	Groundwater Pathway	BTV
saturated/unsaturated		u	u	u	u	u				
PID	i.u.	0	0	0	0	0				
Detected VOCs										
Benzene	mg/kg	---				*0.072J*	**1.6**	7.07	*0.0051*	---
Ethylbenzene	mg/kg	---					**8.02**	35.4	*1.57*	---
Naphthalene	mg/kg	---					**5.52**	24.1	*0.6582*	---
n-Propylbenzene	mg/kg	---					**264**	264	---	---
Tetrachloroethene	mg/kg	---					**33**	145	*0.0045*	---
Toluene	mg/kg	---					**818**	818	*1,107.2*	---
1,2,4-TMB	mg/kg	---					**219**	219	*1.3821*	---
1,3,5-TMB	mg/kg	---					**182**	182		---
Total Xylenes	mg/kg	---					260	260	3.96	---
Detected PAHs										
Acenaphthene	mg/kg		---	---	---	---	**3,590**	45,200	---	
Acenaphthylene	mg/kg		---	---	---	---	**---**	---	---	---
Anthracene	mg/kg		---	---	---	---	**17,900**	100,000	*196.9492*	---
Benzo(a)anthracene	mg/kg	**2.22**	---	---	---	---	**1.14**	20.8	---	---
Benzo(a)pyrene	mg/kg	***2.15***	---	---	---	---	**0.115**	2.11	*0.470*	---
Benzo(b)fluoranthene	mg/kg	***3.2***	---	---	---	---	**1.15**	21.1	*0.4781*	---
Benzo(g,h,i)perylene	mg/kg		---	---	---	---	**---**	---	---	---
Benzo(k)fluoranthene	mg/kg		---	---	---	---	**11.5**	211	---	---
Chrysene	mg/kg	*2.33*	---	---	---	---	**115**	2,110	*0.1442*	---
Dibenz(a,h)anthracene	mg/kg	**0.276**	---	---	---	---	**0.115**	2.11	---	---
Fluoranthene	mg/kg		---	---	---	---	**2,390**	30,100	*88.8778*	---
Fluorene	mg/kg		---	---	---	---	**2,390**	30,100	*14.8299*	---
Indeno(1,2,3-cd)pyrene	mg/kg		---	---	---	---	**1.15**	21.1	---	---
1-Methyl naphthalene	mg/kg		---	---	---	---	**17.6**	72.7	---	---
Phenanthrene	mg/kg		---	---	---	---	**---**	---	---	---
Pyrene	mg/kg		---	---	---	---	**1,790**	22,600	*54.5455*	---
Detected RCRA Metals										
Arsenic	mg/kg	---	---	---	---	---	**0.677**	3	*0.584*	(8)
Barium	mg/kg	---	---	---	---	---	**15,300**	100,000	*164.8*	(364)
Cadmium	mg/kg		---	---	---	---	**71.1**	985	*0.752*	(1)
Chromium (a)	mg/kg	---	---	---	---	---	**(b)**	(b)	*360,000 (c)*	(44) (d)
Lead	mg/kg	---	---	---	---	---	**400**	800	*27*	(52)
Mercury	mg/kg	---	---	---	---	---	**3.13**	3.13	*0.208*	---
Cumulative Harzard Index		0.1267	0.0101	0.0101	0.0101	0.0146	**---**	---	---	---
Cumulative Cancer Risk		2.7E-05	4.3E-07	4.3E-07	4.3E-07	5.5E-07	**---**	**---**	---	---

Notes:

Bold concentrations exceed NR 720 non-industrial direct contact RCLs
Boxed concentrations exceed NR 720 industrial direct contact RCLs
Italicized concentrations exceed NR 720 groundwater pathway RCLs
Concentrations in parenthises exceed NR 720 BTV
--- Not analyzed/Not Established
RCL - residual contaminant level
BTV = Background Threshold Value

PID = Photoionization Detector
S/U = Sample Saturated/Unsaturated
i.u. - instrument units
PAH - polynuclear aromatic hydrocarbons
VOC - volatile organic compounds
mg/kg -milligrams per kilogram

J - concentration detected between the laboratory Limit of Detection and the Limit of Quantitation
a: Total Chromium laboratory analytical results may be comprised of trivalent chromium (Cr III) and/or hexavalent chromium (Cr VI)
b: DC RCLs for Chromium VI are 0.301 (NI) and 6.36 mg/kg (I) and DC RCL for Chromium III is 100,000 mg/kg
c: use 360,000 mg/kg for GW RCL, if no CR-VI is present
d: BTV applies to Total Chromium = CR-III and CR-VI

A.3. ResidualSoil Contamination Table (Page 4 of 4)

BMO Harris Bank Property
900 E. Main Street
Merrill, Wisconsin
BRRTS No. 02-35-584409

Analytical Parameter	Location / Depth / Date / Units	SP-13 2-4' 10/29/2019	SP-14 2-4' 10/29/2019	SP-15 2-4' 10/29/2019	SP-16 2-4' 10/29/2019	SP-17 2-4' 10/29/2019	NR 720 RCL		
saturated/unsaturated		u	u	u	u	u	Direct Contact	Direct Contact	Groundwater
PID	i.u.	0	0	0	0	0	Non-Industrial	Industrial	Pathway
Detected PAHs									
Acenaphthene	mg/kg						**3,590**	45,200	---
Acenaphthylene	mg/kg						**---**	---	---
Anthracene	mg/kg						**17,900**	100,000	*196.9492*
Benzo(a)anthracene	mg/kg						**1.14**	20.8	---
Benzo(a)pyrene	mg/kg		***0.83***				**0.115**	2.11	*0.470*
Benzo(b)fluoranthene	mg/kg		***1.17***				**1.15**	21.1	*0.4781*
Benzo(g,h,i)perylene	mg/kg						**---**	---	---
Benzo(k)fluoranthene	mg/kg						**11.5**	211	---
Chrysene	mg/kg		*0.91*				**115**	2,110	*0.1442*
Dibenz(a,h)anthracene	mg/kg						**0.115**	2.11	---
Fluoranthene	mg/kg						**2,390**	30,100	*88.8778*
Fluorene	mg/kg						**2,390**	30,100	*14.8299*
Indeno(1,2,3-cd)pyrene	mg/kg						**1.15**	21.1	---
1-Methyl naphthalene	mg/kg						**17.6**	72.7	---
2-Methyl naphthalene	mg/kg						**239.0**	3,010	---
Naphthalene	mg/kg						**5.5**	24.1	*0.6582*
Phenanthrene	mg/kg						**---**	---	---
Pyrene	mg/kg						**1,790**	22,600	*54.5455*
Cumulative Harzard Index		0.0009	0.0494	0.0009	0.004	0.0009	**---**	---	---
Cumulative Cancer Risk		2.4E-07	1.0E-05	2.3E-07	8.4E-07	2.3E-07	**---**	**---**	---

Notes:

Bold concentrations exceed NR 720 non-industrial direct contact RCLs
Boxed concentrations exceed NR 720 industrial direct contact RCLs
Italicized concentrations exceed NR 720 groundwater pathway RCLs
--- Not analyzed/Not Established
mg/kg -milligrams per kilogram
RCL - residual contaminant level
J - concentration detected between the laboratory Limit of Detection and the Limit of Quantitation

PID = Photoionization Detector
S/U = Sample Saturated/Unsaturated
i.u. - instrument units
PAH - polynuclear aromatic hydrocarbons

A.4. VAPOR ANALYTICAL TABLE

BRRTS No. 02-35-584409

BMO Harris Bank Branch
900 E. Main Street
Merrill, Wisconsin 54452

(Only low levels of VOCs that were indicated as laboratory estimated values were detected in the fill soil and in the groundwater samples. Further, no migration pathways (ie. sanitary sewer, water, natural gas, stormwater utilities) are present in this area of the parcel. As such, soil vapors were not evaluated as part of the site investigation activities.)

A.5. OTHER MEDIA OF CONCERN TABLE

BRRTS No. 02-35-584409

BMO Harris Bank Branch
900 E. Main Street
Merrill, Wisconsin 54452

(No other media has been impacted by the petroleum and metal contamination present on the Subject Property.)

Groundwater Elevations Table

BMO Harris Bank Parcel
900 E. Main Street
Merrill, Wisconsin
BRRTS No. 02-35-584409

ELEVATIONS	MW-1	MW-2	MW-3
Surface	1264.03	1264.91	1266.65
Top of Casing	1263.68	1264.36	1266.11
Top of Screen	1258.5	1259.4	1261.1
Bottom of Screen	1248.5	1249.4	1251.1
Groundwater Elevations			
8/27/2019	1252.61	1252.18	1252.30
11/29/2019	1252.42	1252.1	1252.09

Notes:
Benchmark - fire hydrant on NW corner of First St and Mill St
(EL. 1265.3)

A.7. OTHER TABLE

BRRTS No. 02-35-584409

BMO Harris Bank Branch
900 E. Main Street
Merrill, Wisconsin 54452

(No active soil or groundwater remedial systems have been installed on the site. Due to the low levels of estimated contaminant concentrations, natural attenuation data was not been collected for this parcel.)

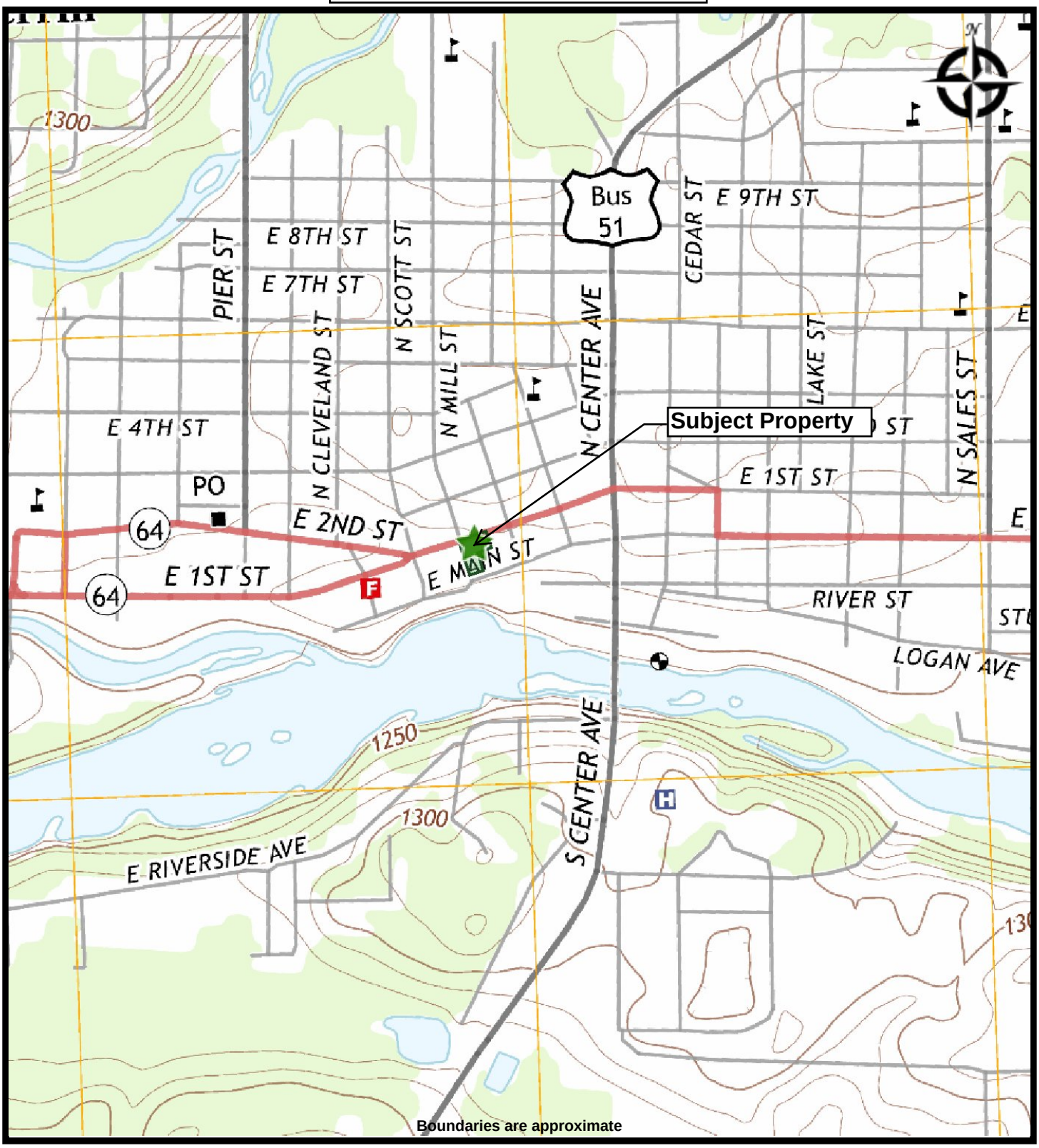
ATTACHMENT B

BRRTS No. 02-35-584409

BMO Harris Bank Branch
900 E. Main Street
Merrill, Wisconsin 54452

(Maps, Figures, and Photos)

B.1.a. LOCATION MAP
BRRTS No. 02-35-584409



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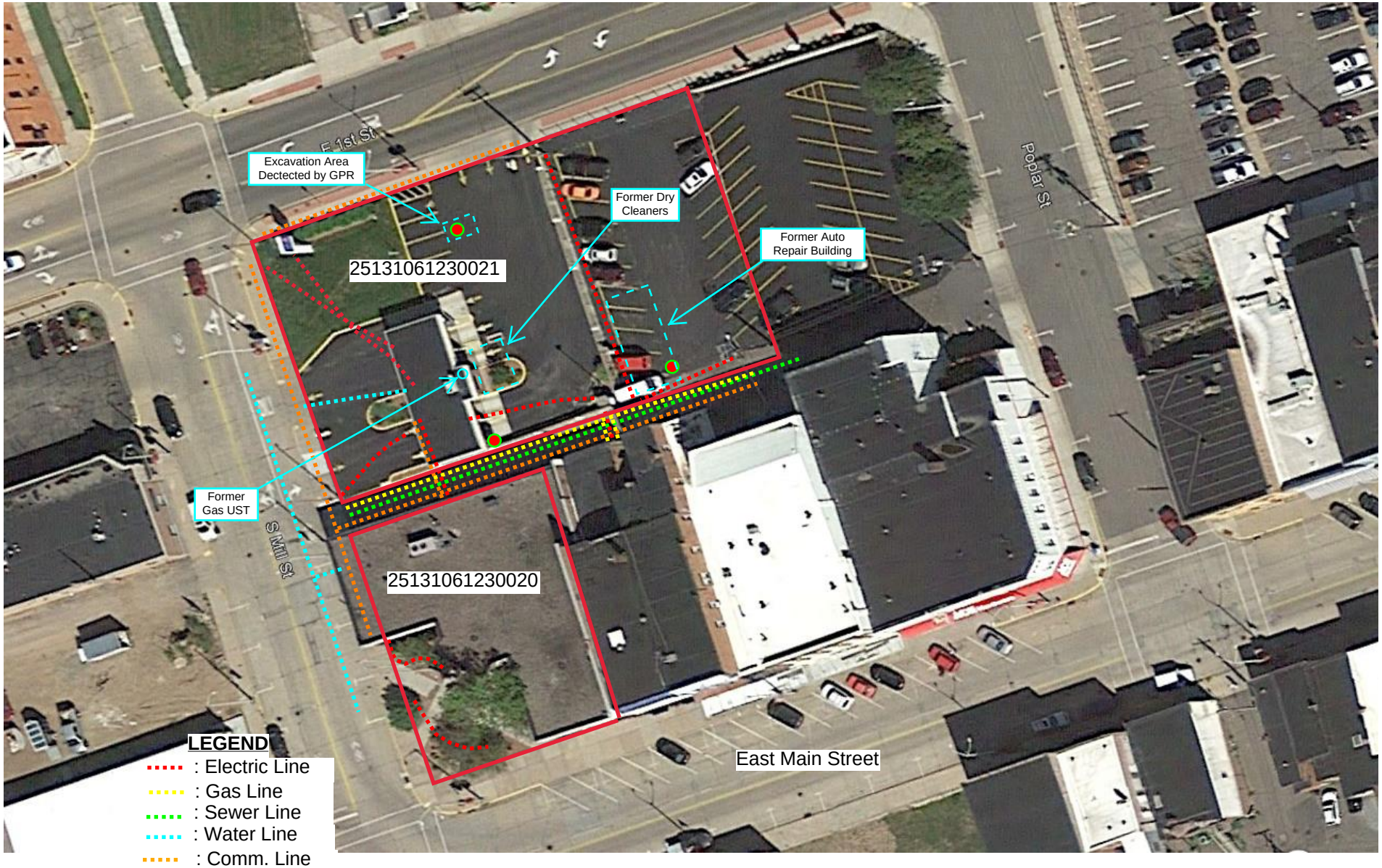
SITE LOCATION MAP

BMO HARRIS BANK BRANCH
900 East Main Street
Merrill, Wisconsin 54452

BRRTS No. 02-35-584409

B.1.b. DETAILED SITE MAP
BRRTS No. 02-35-584409



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Environmental Services
821 Corporate Court
Waukesha, Wisconsin 53189
(262) 521-2125 Fax (262) 521-2471

BMO Bank Branch
900 East Main Street
Merrill, Wisconsin 54452

Scale:
Not to Scale

Date:
11/11/2019

NORTH

B.1.c. RR SITES MAP
BRRTS No. 02-35-584409

Legend

- Open Site
- Closed Site
- Continuing Obligations Apply

0.1 0 0.06 0.1 Miles

NAD_1983_HARN_Wisconsin_TM

1: 3,960

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

B.2.a. SOIL CONTAMINATION
BRRTS No. 02-35-584409

Legend:
- : Soil Probe Location - 7/1/2019
- : Soil Probe Location - 8/28/2019
- : Probe/NR-141 Well Location- 8/28/2019
- : Soil Probe Location - 10/29/2019

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Environmental Services
821 Corporate Court
Waukesha, Wisconsin 53189
(262) 521-2125 Fax (262) 521-2471

BMO Bank Branch
900 East Main Street
Merrill, Wisconsin 54452

Scale: Not to Scale

Date: 2/7/2019

NORTH

B.2.B. RESIDUAL SOIL CONTAMINATION
BRRTS No. 02-35-584409

Legend:
- : Soil Probe Location - 7/1/2019
- : Soil Probe Location - 8/28/2019
- : Probe/NR-141 Well Location- 8/28/2019
- : Soil Probe Location - 10/29/2019

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Environmental Services
821 Corporate Court
Waukesha, Wisconsin 53189
(262) 521-2125 Fax (262) 521-2471

BMO Bank Branch
900 East Main Street
Merrill, Wisconsin 54452

Scale: Not to Scale

Date: 2/7/2019

NORTH

B.3.a. GEOLOGIC CROSS SECTION DIAGRAM
BRRTS No. 02-35-584409

Legend:
- : Soil Probe Location - 7/1/2019
- : Soil Probe Location - 8/28/2019
- : Probe/NR-141 Well Location- 8/28/2019
- : Soil Probe Location - 10/29/2019

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Environmental Services
821 Corporate Court
Waukesha, Wisconsin 53189
(262) 521-2125 Fax (262) 521-2471

BMO Bank Branch
900 East Main Street
Merrill, Wisconsin 54452

Scale:
Not to Scale

Date:
2/7/2019

NORTH

A

A'

Approximate Extent of Cadmium Impacted Fill
(dashed blue line)

Approximate Extent of PAH Impacted Fill
(dashed red line)

SP-8 (MW-2) 1264.91

SP-9

SP-1

SP-5 (MW-1) 1264.03

SP-16

ASPHALT/CONCRETE

CONCRETE WALL

FILL
SILTY SAND

SAND

SANDY SILT

SILTY SAND

POSSIBLE FILL
SANDY SILT

SAND

ELEVATION IN FEET (MSL)

1265
1263.5
1262
1261.5
1259
1257.5
1256
1254.5
1253
1251.5
1250
1248.5
1247
1245.5

BRRTS No. 02-35-584409

KEY:

BORING
GRADE
SAMPLE LOCATION
MATERIAL DESCRIPTION
SCREENED INTERVAL
WATER LEVEL

0 10'
HORIZONTAL GRAPHIC SCALE
VERTICAL EXAGGERATION 3X

ALL LOCATIONS ARE APPROXIMATE

intertek psi
Total Quality. Assured.

Environmental Services
821 Corporate Court
Waukesha, Wisconsin 53189
(262) 521-2125 (262) 521-2471 fax

Geologic Cross-Section A-A'

BMO Harris Bank
900 E. Main Street
Merrill, Wisconsin 54452

Checked:	Scale:	Date:	Figure:
P. Patterson	See Figure	Dec 9, 2019	1

Drawn:	Project Number:
C. Moran 00541993-1 x-sect.dwg	00541993

B

B'

Former UST Location

Approximate Extent of Cadmium Impacted Fill
(dashed blue line)

Approximate Extent of PAH Impacted Fill
(dashed red line)

SP-12 (MW-3) 1266.65

SP-4

SP-13

SP-9

SP-15

ASPHALT/CONCRETE

CONCRETE WALL

FILL
SILTY SAND/
SANDY SILT

FILL
SILTY SAND

FILL
SILTY SAND/
SANDY SILT/
SAND

FILL
SILTY SAND

FILL
SILTY SAND/
SANDY SILT

SAND

SANDY SILT

SILTY SAND

SANDY SILT

SILTY SAND

SILTY SAND

SILTY SAND

SILTY SAND

ELEVATION IN FEET (MSL)

1267
1265.5
1264
1262.5
1261
1259.5
1258
1256.5
1255
1253.5
1252
1250.5
1249
1247.5

BRRTS No. 02-35-584409

KEY:

BORING
GRADE
SAMPLE LOCATION
MATERIAL DESCRIPTION
SCREENED INTERVAL
WATER LEVEL

0 10'

HORIZONTAL GRAPHIC SCALE
VERTICAL EXAGGERATION 3X

ALL LOCATIONS ARE APPROXIMATE

intertek psi
Total Quality. Assured.

Environmental Services

821 Corporate Court
Waukesha, Wisconsin 53189
(262) 521-2125 (262) 521-2471 fax

Geologic Cross-Section B-B'

BMO Harris Bank
900 E. Main Street
Merrill, Wisconsin 54452

Checked:	Scale:	Date:	Figure:
P. Patterson	See Figure	Dec 9, 2019	2

Drawn:	Project Number:
C. Moran 00541993-1 x-sect.dwg	00541993

B.3.b. GROUNDWATER ISOCONCENTRATION

BRRTS No. 02-35-584409

BMO Harris Bank Branch
900 E. Main Street
Merrill, Wisconsin 54452

(Only low levels of PCE, Benzo(b)fluoranthene, and Chrysene that were indicated by the analytical laboratory as estimated and are not considered at accurate were detected slightly above their NR140 PALs. Because of the inaccuracy of the test results, it is anticipated that the groundwater is not impacted with contaminants above NR140 groundwater quality standards and, as such, isoconcentration maps were prepared for this closure.)

GROUNDWATER FLOW DIRECTION DIAGRAM
BRRTS No. 02-35-584409

Legend:
- : Soil Probe Location - 7/1/2019
- : Soil Probe Location - 8/28/2019
- : Probe/NR-141 Well Location- 8/28/2019

10-29-19 Groundwater Measurements

intertek psi

Environmental Services
821 Corporate Court
Waukesha, Wisconsin 53189
(262) 521-2125 Fax (262) 521-2471

BMO Bank Branch
900 East Main Street
Merrill, Wisconsin 54452

Scale:
Not to Scale

NORTH

B.2.d. MONITORING WELLS
BRRTS No. 02-35-584409

Legend:

: Probe/NR-141 Well Location- 8/28/2019

:Wells proposed to be abandoned

intertek psi

Environmental Services
821 Corporate Court
Waukesha, Wisconsin 53189
(262) 521-2125 Fax (262) 521-2471

BMO Bank Branch
900 East Main Street
Merrill, Wisconsin 54452

Scale:
Not to Scale

Date:
2/7/2019

NORTH

B.4.a. VAPOR INTRUSION MAP

BRRTS No. 02-35-584409

BMO Harris Bank Branch
900 E. Main Street
Merrill, Wisconsin 54452

(At the time of the site investigative activities, an evaluation for the presence of VOCs was not performed on the Subject Property since only low levels of these VOC compounds were detected in the selected soil samples or in the collected groundwater samples. Further, these detected low concentrations were indicated by the laboratory as estimated values that are not considered to be accurate.)

B.4.b. OTHER MEDIA OF CONCERN

BRRTS No. 02-35-584409

BMO Harris Bank Branch
900 E. Main Street
Merrill, Wisconsin 54452

(No other media exists on this site)

B.4.c. OTHER

BRRTS No. 02-35-584409

BMO Harris Bank Branch
900 E. Main Street
Merrill, Wisconsin 54452

(This section left blank)

B.5. STRUCTURAL IMPEDIMENT PHOTOS

BRRTS No. 02-35-584409

BMO Harris Bank Branch
900 E. Main Street
Merrill, Wisconsin 54452

(No structural impediment features were present on the Subject Property at the time of the site investigative activities.)

ATTACHMENT C

(Documentation of Remedial Action)

BRRTS No. 02-35-584409

BMO Harris Bank Branch
900 E. Main Street
Merrill, Wisconsin 54452

C.1. SITE INVESTIGATION DOCUMENTATION

BRRTS No. 02-35-584409

BMO Harris Bank Branch
900 E. Main Street
Merrill, Wisconsin 54452

(PSI's Supplemental Phase II ESA Report, dated September 20, 2019 and PSI's Site Investigation Report, dated December 10, 2019 were submitted to the WDNR on December 17, 2019.)

C.2. INVESTIGATIVE WASTE

BRRTS No. 02-35-584409

BMO Harris Bank Branch
900 E. Main Street
Merrill, Wisconsin 54452

Well Installation and Development:

Soils generated from the well installation and groundwater generated from the well development and sampling activities was containerized into 55-gallon drums. Copies of the documents associated with the disposal of these materials follow this page.

NON-HAZARDOUS WASTE MANIFEST

1. Generator ID Number: N / A
2. Page 1 of 1
3. Emergency Response Phone: (800) 860-8003
4. Waste Tracking Number: BMOMER001

5. Generator's Name and Mailing Address
BMO Harris Bank
900 E. Main Main St., Merrill, WI 54452
Generator's Phone: (715) 536-9555

Generator's Site Address (if different than mailing address)

6. Transporter 1 Company Name
OSI Environmental, Inc.
U.S. EPA ID Number: WIR000117036

7. Transporter 2 Company Name
U.S. EPA ID Number:

8. Designated Facility Name and Site Address
OSI Environmental, Inc.
2253 Progress Way, Kaukauna, WI 54130
Facility's Phone: (920) 759-0252
U.S. EPA ID Number: WIR000117036

GENERATOR

9. Waste Shipping Name and Description	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	
1. Non-Hazardous Soil Borings, Non-Regulated	003	DM	0600	P	NONE
2. Non-Hazardous Ground Water, Non-Regulated	001	DM	0410	G	NONE
3.					
4.					

13. Special Handling Instructions and Additional Information
1. Soil Borings- Non-Hazardous
2. Purge/Developmental Water- Non-Hazardous

OSI Job #: 40-4168
PSI Project #: ________ BMO Bank- Merrill

14. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations.

Generator's/Offeror's Printed/Typed Name: Jenny Jelly
Signature: [signature]
Month 11 Day 12 Year 19

INT'L

15. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter Signature (for exports only): Date leaving U.S.:

TRANSPORTER

16. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: Marlin Waupoose
Signature: [signature]
Month 11 Day 12 Year 19

Transporter 2 Printed/Typed Name
Signature
Month Day Year

DESIGNATED FACILITY

17. Discrepancy
17a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection

Manifest Reference Number:

17b. Alternate Facility (or Generator)
U.S. EPA ID Number
Facility's Phone:

17c. Signature of Alternate Facility (or Generator)
Month Day Year

18. Designated Facility Owner or Operator: Certification of receipt of materials covered by the manifest except as noted in Item 17a
Printed/Typed Name: Jon L. Burkert
Signature: [signature]
Month 11 Day 12 Year 19

169-BLS-C 5 11979 (Rev. 9/09)

TRANSPORTER #2

<4017991

C.3. SITE EVALUATION METHODOLOGY

BRRTS No. 02-35-584409

BMO Harris Bank Branch
900 E. Main Street
Merrill, Wisconsin 54452

Residual Contaminant Levels expressed in Department's RCL Spreadsheet were utilized for data evaluation. Site Specific Levels were not used for this site.

C.4. CONSTRUCTION DOCUMENTATION

BRRTS No. 02-35-584409

BMO Harris Bank Branch
900 E. Main Street
Merrill, Wisconsin 54452

No system was installed on this parcel.

C.5. DECOMMISSIONING OF REMEDIAL SYSTEMS

BRRTS No. 02-35-584409

BMO Harris Bank Branch
900 E. Main Street
Merrill, Wisconsin 54452

No remedial systems were installed on this site.

C.6. OTHER

BRRTS No. 02-35-584409

BMO Harris Bank Branch
900 E. Main Street
Merrill, Wisconsin 54452

(This section is blank)

ATTACHMENT D

(Maintenance Plan and Photographs)

BRRTS No. 02-35-584409

BMO Harris Bank Branch
900 E. Main Street
Merrill, Wisconsin 54452

BARRIER MAINTENANCE PLAN FOR EXISTING PAVEMENT

April 7, 2020

Activity ERP Case Site Name:

BMO Harris Bank Branch

Current Property Address:

900 EAST MAIN STREET

CITY OF MERRILL, WISCONSIN 54452

WDNR BRRTS/Activity No.: 02-35-584409

WDNR FID No.: not assigned

Legal Description

Original Plat of Jenny Lots 5 and 6 Block 3 with address 900 E. Main Street and Original Plat of Jenny Lots 7, 8, 9, and 10 Block 3 with address S. Mill Street in the City of Merrill, Lincoln County, Wisconsin.

Tax Parcel Number

Property IDs: 25131061230020 and 25131061230021

Introduction

This document is the Maintenance Plan for an existing cover/barrier at the above-referenced property in accordance with the requirements of s. NR 724.13(2), Wisconsin Administrative Code. The maintenance activities relate to the existing asphalt and concrete paved surfaces that occupy the area over the entire area of the known contaminated soil present on the northern portion of the BMO Harris Bank Branch (Property ID. 25131061230021).

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

- The case file in the DNR Northern regional office
- At http://dnr.wi.gov/topic/Brownfields/wrrd.html, which includes:
    - BRRTS on the Web (DNR's internet-based data base of contaminated sites) for the link to a PDF for site-specific information at the time of closure and on continuing obligations;
    - RR Sites Map for a map view of the site, and
- The DNR project manager for Lincoln County.

Description of Contamination

Soil contaminated by polynuclear aromatic hydrocarbon (PAH) constituents and the RCRA Metal Cadmium are present on the northern portion of the BMO Harris Bank Branch (Property ID. 25131061230021) and located within fill soils in the upper 4 feet of the above-referenced property. The extent of the residual soil contamination

is shown in the attached Exhibit A. The existing asphalt and concrete pavement covers the area of residual PAH contamination.

Description of the Barrier/Cover to be Maintained

The existing barrier/cover consists of approximately 3 inches of asphalt or concrete pavement. The location of the barrier/cover/cap to be maintained in accordance with this Maintenance Plan is identified in the map located in Exhibit A. This cap covers the entire area of the known PAH and Cadmium impacted soils that are present on this portion of the parcel.

Cover Purpose

The existing barrier/cover/cap serves as a barrier to prevent direct human contact with residual soil contamination on the Subject Property that might otherwise pose a threat to human health. It also acts as an infiltration barrier to eliminate future soil-to-groundwater contamination migration that would violate the groundwater standards in Ch. NR 140, WAC. Based on the current and future use of the Subject Property, this existing barrier should function as intended unless disturbed.

Annual Inspection

The existing asphalt and concrete pavement overlying the contaminated soil as depicted in Exhibit A will be inspected once a year, normally in the spring after all snow and ice is gone, for deterioration and other potential problems that can cause additional infiltration into or exposure to underlying soils. The inspections will be performed by the property owner or their designated representative. The inspections will be performed to evaluate damage due to settling, exposure to the weather, wear from traffic, and other factors. Any area where soils have become or are likely to become exposed will be documented.

A log of the inspections and any repairs will be maintained by the property owner and is included D.4, Form 4400-305, Continuing Obligations Inspection and Maintenance Log. The log will include recommendations for necessary repair of any areas where underlying soils are exposed. Once repairs are completed, they will be documented in the inspection log. A copy of the maintenance plan and inspection log will be kept at the site; or, if there is no acceptable place (for example, no building is present) to keep it at the site, at the address of the property owner and available for submittal or inspection by Wisconsin Department of Natural Resources (DNR) representatives upon their request.

Maintenance Activities

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

In the event the existing pavement overlying the PAH and Cadmium contaminated soil is removed or replaced for future site development, the replacement barrier must be equally impervious (ie. asphalt and/or concrete pavement; building; and/or clean clayey fill soils). Any replacement barrier will be subject to the same

maintenance and inspection guidelines as outlined in this Maintenance Plan unless indicated otherwise by the WDNR or its successor.

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

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

The following activities are prohibited on any portion of the property where the existing pavement cover barrier is present as shown on the attached map (Exhibit A), unless prior written approval has been obtained from the Wisconsin Department of Natural Resources: 1) removal of the existing barrier; 2) replacement with another barrier; 3) excavating or grading of the land surface; 4) filling on capped areas; 5) plowing for agricultural cultivation; 6) construction or placement of a building(s) and/or underground utilities; or 7) changing the use or occupancy of the property to a residential exposure setting, which may include certain uses, such as single or multiple family residences, a school, day care, senior center, hospital, or similar residential exposure settings.

If removal, replacement or other changes to a cover, or a building which is acting as a cover, are considered, the property owner will contact DNR at least 45 days before taking such an action, to determine whether further action may be necessary to protect human health, safety, or welfare or the environment, in accordance with s. NR 727.07, Wis. Adm. Code.

Amendment or Withdrawal of Maintenance Plan

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

Contact Information

Site Owner:
BMO Harris Bank, NA
111 West Monroe Street
Chicago, IL 60603
(630) 981-1538

Site Operator:
BMO Harris Branch
900 E. Main Street
Merrill, WI 54452
(715) 536-9555

Consultant:
Professional Service Industries, Inc.
Mr. Patrick Patterson
Project Manager
821 Corporate Court, Suite 102
Waukesha, Wisconsin 53189
(262) 521-2125

WDNR:
R&R Program-Hydrogeologist
Mr. Andy Alles
223 E. Steinfest Road
Antigo, Wisconsin 54409
(715) 623-4190 Ext. 3109

Exhibit A

Exhibit B

BARRIER INSPECTION LOG

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

D.2 LOCATION MAP
BRRTS No. 02-35-584409

Legend:

- : Soil Probe Location - 7/1/2019
- : Soil Probe Location - 8/28/2019
- : Probe/NR-141 Well Location- 8/28/2019
- : Soil Probe Location - 10/29/2019

intertek psi

Environmental Services
821 Corporate Court
Waukesha, Wisconsin 53189
(262) 521-2125 Fax (262) 521-2471

BMO Bank Branch
900 East Main Street
Merrill, Wisconsin 54452

Scale: Not to Scale

Date: 2/7/2019

NORTH

1. Photograph shows highway cones placed at the locations of SP-1 (left) and SP-2 (right) and the surrounding asphalt pavement and small retaining walls associated with the Subject Property. The photograph is taken facing to the west from the alleyway.

2. Photograph shows the northern drive-thru lines of the service window building associated with the BMO Harris Bank parcel. The highway cone shows the location of SP-4. A stormwater drain is located south of SP-4. SP-11 was placed in the grass area shown on the right side of the photograph. Photograph taken facing to the west.

3. Photograph shows the southern drive-thru lines of the service window building and the highway cone is placed over SP-3. The photograph also shows the retaining wall along the alleyway and the asphalt and concrete pavement associated with the bank parcel.

4. Photograph shows the drive-thru window building and SP-3 (left) and SP-4 (right).

5. Photograph shows the alleyway and is taken facing to the west.

6. Photograph taken for near the northern property line and facing to the south. The photograph shows SP-12/MW-3 (in foreground), SP-10 (in the near background), and SP-9 (background left) and SP-8/MW-2 (background right). The photograph also shows the asphalt and concrete pavement associated with the bank parcel.

7. Photograph taken from the alleyway and facing to the north and shows the northeastern portion of the asphalt parking lot area. The highway cone is over SP-17 and SP-7 would be to the northwest of SP-17.

8. Photograph shows the alleyway from east to west. The near highway cone is over SP-16, while the farther cone is near SP-5/MW-1. The drums are associated with the installation and sampling of the wells.

9. Photograph shows the alleyway facing to the east from near the west end and the retaining wall present along the north side of the alley. The highway cone is over SP-9.

10. Photograph shows a highway cone over SP-14 and a stormwater drain.

11. Photograph shows a highway cone over SP-13.

12. Photograph shows the western side of the drive-thru window building and the alleyway (right side of photo). Photograph also shows asphalt and concrete pavement associated with the bank parcel.

Save.. Print.. Clear Data Submit by Email

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

Continuing Obligations Inspection and Maintenance Log

Form 4400-305 (2/14)

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

Activity (Site) Name	BRRTS No. 02-35-584409
BMO Harris Bank Branch	

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

- annually
- semi-annually
- other- specify _____

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

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

ow

Save..

{Click to Add/Edit Image} Date added:

Title:

{Click to Add/Edit Image} Date added:

Title:

Save...

ATTACHMENT E

(Monitoring Well Information)

BRRTS No. 02-35-584409

BMO Harris Bank Branch
900 E. Main Street
Merrill, Wisconsin 54452

(Three (3) NR141 compliant monitoring wells (MW-1 through MW-3) were installed on the Subject Property on August 28, 2019 by PSI. These wells will be abandoned in accordance with NR141 requirements following WDNR site closure.)

CONFIDENTIAL

274/93

Parcel 3

No. 652. Quitclaim Deed—Corporation to Corporation.

215385

Published by Eau Claire Book & Stationery Co.

Know All Men by These Presents:

THAT THE MERRILL ELECTRIC CO., INC.

a corporation duly organized and existing under the laws of Wisconsin and having its principle office in the City *of* Merrill *and State of Wisconsin, party of the first part, in consideration of the sum of* One Dollar and Other Good and Valuable /Consideration ~~Dollars~~ *to it duly paid, the receipt whereof is hereby confessed and acknowledged, does hereby remise, release, sell, convey and quitclaim unto* CITIZENS AMERICAN BANK *a corporation* /duly organized and existing under the laws of Wisconsin and located in the City of Merrill, State of Wisconsin *party of the second part, and to its successors and assigns, forever, all the right, title, interest, claim and demand, which said party of the first part has in and to the following described real estate situated in the County of* Lincoln *, in the State of* Wisconsin *to wit:*

Beginning at the northwest corner of Lot Seven (7), Block Three (3), Original Plat of Jenny, now City of Merrill, which is the place of beginning; thence easterly along the north line of Lots Seven (7) and Eight (8), of Block Three (3), aforesaid, 77 feet 1/2 inch; thence southerly on a line parallel with the west line of Lot Seven (7), 22 ft. 3½ inches; thence westerly parallel with the north line of said Lots Seven (7) and Eight (8), aforesaid, to the west line of Lot Seven (7) at a point 22 ft. 3½ inches south of the northwest corner thereof; thence north along the west line of Lot Seven (7) to the place of beginning.

FEE # 77.25 (3) EXEMPT

Grantor does hereby also specifically convey and quitclaim to the grantee any and all right, title and interest which grantor has or may have because of that certain reservation of right to use entry way and stairway as means of ingress and egress as set forth in that document recorded in Volume 191 of Miscellaneous, Page 5, Lincoln County, Wisconsin, Registry.

To Have and to Hold, *the same together with all and singular the appurtenances and privileges thereunto belonging or in anywise thereunto appertaining, and all the estate, right, title, interest and claim whatsoever, of the said party of the first part, either in law or equity, either in possession or expectancy, to the only proper use, benefit and behoof of said party of the second part, its successors and assigns forever.*

In Witness Whereof, *the said party of the first part hath caused these presents to be signed by* Jane Annis *its president, countersigned by* Ellsworth Annis, Jr. *its secretary and its corporate seal to be hereunto affixed, this* 6th *day of* May *, 1970 .*

In Presence of

F. A. Doepke

Betty Genrich

MERRILL ELECTRIC CO., INC.

By Jane Annis
Jane Annis, *President.*

Countersigned by:

Ellsworth Annis, Jr., *Secretary.*

MERRILL ELECTRIC CO., INC. Corporate Seal

CONFIDENTIAL

State of Wisconsin, } ss.
Lincoln County.

Personally came before me this 6th day of May, 19 70, Jane Annis, the president of the MERRILL ELECTRIC CO., INC., a corporation, and Ellsworth Annis, Jr., the secretary thereof, to me known to be the persons who as such officers executed the above and foregoing instrument in the name of such corporation, affixed its corporate seal thereto and acknowledged said instrument to be the duly authorized act of said corporation.

F. A. Doepke

F. A. Doepke

Notary Public, Lincoln County, Wisconsin.

My commission ~~expires~~ is permanent., 19xx.
(To be filled in if signed by a Notary Public)

This instrument drafted by
Attorney J. Michael Nolan,
Merrill, Wisconsin 54452.

215385

To

QUITCLAIM DEED

REGISTER'S OFFICE, } ss.
Lincoln County, Wis.

Received for Record this 7 day of May, 19 70, at 3:40 o'clock P M, and recorded in Vol. 274 of Deeds on Page 43

Register of Deeds.

3.00

08/20/09 13:17 FAX 920 749 5438 REG'L ACCTG 006

F.2. CERTIFIED SURVEY MAP (page 1 of 2)
BRRTS No. 02-35-584409

CONFIDENTIAL

SCHEDULE OF LANDS & INTERESTS REQUIRED

AREAS SHOWN IN THE TOTAL ACRES COLUMN MAY BE APPROXIMATE AND ARE DERIVED FROM TAX ROLLS OR OTHER APPROXIMATE SOURCES AND MAY NOT INCLUDE LANDS OF THE OWNER WHICH ARE NOT CONTIGUOUS TO THE AREA ACQUIRED. OWNER'S NAMES ARE SHOWN FOR REFERENCE PURPOSES ONLY AND ARE SUBJECT TO CHANGE PRIOR TO THE TRANSFER OF LAND INTERESTS TO THE DEPARTMENT.

PARCEL NUMBER	OWNERS	INTEREST REQUIRED	R/W S.F. REQUIRED NEW	EXISTING	TOTAL	T.L.E. S.F.	P.L.E. S.F.
69	PARK CITY CREDIT UNION	TLE	---	---	---	246.82	---
70	MICHAEL J. & MARY A. KRUEGER	TLE	---	---	---	291.17	---
71	TIMOTHY COLLATZ	TLE/FEE	1000.37	---	---	2,858.16	---
72	THOMAS C. KATHART	TLE/FEE	335.93	---	---	335.86	---
73	CITY OF MERRILL	FEE/TLE/PLE	22.54	---	22.54	29,073.27	213.02
74	CITIZENS AMERICAN BANK	TLE	---	---	---	1,270.18	---
76	TROY PROPERTIES, LLC	FEE/TLE	137.52	---	137.52	386.85	---
77	CITY OF MERRILL	TLE	---	---	---	1,066.75	---
78	DONNA J. WOLF	TLE	---	---	---	1,172.82	---
79	COURTSIDE PROPERTIES, LLC	FEE/TLE	14.91	---	14.91	436.73	---
210	WISCONSIN PUBLIC SERVICE CORPORATION (ELECTRIC)	TEMPORARY CONSTRUCTION EASEMENT	---	---	---	---	---
220	WISCONSIN PUBLIC SERVICE CORPORATION (GAS)	TEMPORARY CONSTRUCTION EASEMENT	---	---	---	---	---

COURSE TABLE		
COURSE	BEARING	DISTANCE
443-453	[illegible]	7.86'
443-445	[illegible]	5.40'
451-443	[illegible]	7.57'
452-443	[illegible]	5.45'
400-410	[illegible]	33.02'
416-417	[illegible]	6.65'
416-418	[illegible]	6.16'
417-418	[illegible]	5.85'
418-419	[illegible]	33.00'
420-426	[illegible]	17.76'
434-435	[illegible]	16.36'
435-437	[illegible]	23.35'
452-447	[illegible]	51.29'
452-403	[illegible]	107.25'
401-435	[illegible]	329.97'
400-410	[illegible]	101.09'
428-430	[illegible]	216.76'
401-435	[illegible]	64.50'
450-452	[illegible]	193.52'
433-455	[illegible]	5.08'
455-456	[illegible]	195.09'

STH 64 ALIGNMENT DATA

PI STA 58+46.51
Y = 123565.891
X = 393524.596
BACK = N 89°59'06.5" E
AHEAD = N 30°54'02.5" E

TRANSPORTATION PROJECT PLAT NO: 9000-10-21-4.04

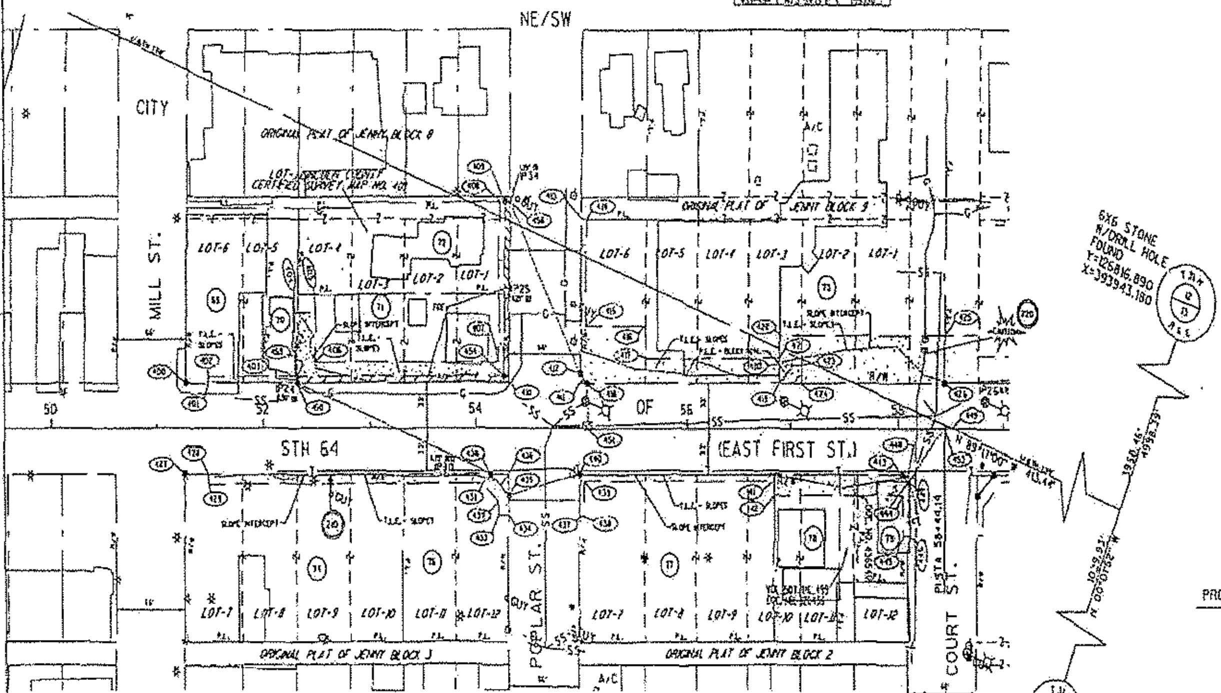
THAT PART OF THE SE1/4 - SW1/4, AND PART OF THE NE1/4 - SW1/4 OF SEC. 12, T31N, R6E, CITY OF MERRILL. ALL IN LINCOLN COUNTY, WISCONSIN.

RELOCATION ORDER EAST 1ST STREET, CITY OF MERRILL (GRAND AVENUE (STH 107) - NORTH SCOTT STREET & MILL STREET - CENTER AVENUE), STH 64 (EAST 1ST STREET), LINCOLN COUNTY

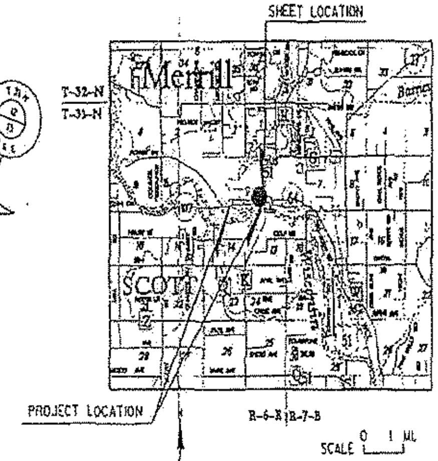
TO PROPERLY ESTABLISH, LAY OUT, WIDEN, ENLARGE, EXTEND, CONSTRUCT, RECONSTRUCT, IMPROVE, OR MAINTAIN A PORTION OF THE HIGHWAY DESIGNATED ABOVE, THE CITY OF MERRILL DEEMS IT NECESSARY TO RELOCATE OR CHANGE SAID HIGHWAY AND ACQUIRE CERTAIN LANDS AND INTERESTS OR RIGHTS IN LANDS FOR THE ABOVE NAMED PROJECT. TO EFFECT THIS CHANGE, PURSUANT TO AUTHORITY GRANTED UNDER SUBSECTION SECTION 62.22, WISCONSIN STATUTES, THE CITY OF MERRILL HEREBY ORDERS THAT:

1. THAT PORTION OF SAID HIGHWAY AS SHOWN ON THIS PLAT IS LAID OUT AND ESTABLISHED TO THE LINES AND WIDTHS AS SO SHOWN FOR THE ABOVE NAMED PROJECT.
2. THE LANDS OR INTERESTS OR RIGHTS IN LANDS AS SHOWN ON THIS PLAT ARE REQUIRED BY THE CITY FOR THE ABOVE PROJECT AND SHALL BE ACQUIRED IN THE NAME OF THE CITY OF MERRILL, PURSUANT TO THE PROVISIONS OF SECTION 62.22 (1) AND (1m), WISCONSIN STATUTES.

EXISTING MONUMENTS			
POINT	DESCRIPTION	X (EASTING)	Y (NORTHING)
P74	0.50" OIP	392524.804	122691.335
P75	1.25" OIP	393107.245	122813.315
P76	0.75" IROD	393155.064	122923.045
P77	0.75" IROD	393603.020	123501.220
P73	[illegible]	393915.865	123532.928
P79	0.75" IROD	394277.536	123533.373
P31	0.75" IROD	393553.423	122976.340
P31	1.25" OIP	394023.396	123076.529
P31	0.75" IROD	394075.421	122567.391
P34	1.25" OIP	393051.067	122841.081



SHEET LOCATION



LOCATION SKETCH

POINT NUMBER	STATION	OFFSET	POINT NUMBER	STATION	OFFSET	POINT NUMBER	STATION	OFFSET	POINT NUMBER	STATION	OFFSET
400	51+28.33	-33.00	417	55+50.56	-51.00	434	54+31.12	63.01	451	55+05.07	0.00
401	51+50.00	-33.00	418	55+05.03	-33.00	435	54+31.70	49.56	453	58+44.14	0.00
402	51+50.00	-35.00	419	55+89.37	-33.00	436	54+31.50	32.00	454	54+27.39	-38.00
403	52+30.00	-35.00	420	55+90.03	-45.00	437	54+91.11	61.84	455	52+32.40	-38.00
404	52+30.00	-65.00	421	55+90.00	-51.00	438	55+02.11	63.91	456	54+34.00	-165.26
405	52+50.00	-65.00	422	56+50.00	-68.00	439	55+02.44	35.00			
406	52+50.00	-48.00	423	57+12.01	-46.00	440	54+97.52	33.00			
407	54+22.57	-48.00	424	57+10.87	-33.00	441	56+84.91	35.00			
408	54+24.00	-165.23	425	55+34.67	-56.00	442	56+84.75	40.00			
409	54+29.00	-165.24	426	55+44.17	-33.00	443	58+05.34	33.00			
410	54+32.33	-33.00	427	51+21.50	33.00	444	58+05.30	45.00			
411	54+98.34	-33.00	428	51+50.00	33.00	445	58+64.73	77.37			
412	54+35.42	-39.74	429	51+50.00	60.00	446	58+69.73	72.33			
413	56+99.85	-152.99	430	54+16.25	33.00	447	58+20.22	33.47			
414	55+04.85	-152.93	431	54+07.30	40.00	448	58+20.29	33.00			
415	55+22.37	-75.00	432	54+21.24	53.25	449	58+51.73	0.00			
416	55+50.06	-75.00	433	55+21.17	52.89	450	58+32.33	33.00			

SEC. 12
SE/SW
MERRILL

EXISTING BUILDINGS WHICH OCCUPY TLE AREAS WILL NOT BE AFFECTED.

Refer to the Title Sheet, recorded as Sheet 2 of 2, in Volume 1 of Transportation Project Plats, Page 11, as Document No. 473642, for additional information.

N

SCALE, FEET
0 50 100

EMCS

I, KEVIN C. BOYER, REGISTERED LAND SURVEYOR, HEREBY CERTIFY THAT IN FULL COMPLIANCE WITH THE PROVISIONS OF SECTION 84.095 OF THE WISCONSIN STATUTES AND UNDER THE DIRECTION OF THE DEPARTMENT, I HAVE SURVEYED TRANSPORTATION PROJECT PLAT 9000-10-21-4.04 AND THAT SUCH PLAT CORRECTLY REPRESENTS ALL EXTERIOR BOUNDARIES OF THE SURVEYED LAND.

WISCONSIN KEVIN C. BOYER S-2675 MARSHFIELD, WI LAND SURVEYOR

Kevin C. Boyer DATE [illegible]
KEVIN C. BOYER
REGISTERED LAND SURVEYOR NUMBER 2675

THIS PLAT IS APPROVED FOR THE CITY OF MERRILL, STATE OF WISCONSIN.

[signature] DATE 3/26/09
(SIGNATURE)
(PRINTED NAME) DOUGLAS C. [illegible]

RECEIVED FOR REGISTER OF DEEDS
PROJECT NUMBER 9000-10-21-4.04
AMENDMENT NO:

ACCEPTED FOR RECORDING AND FILING IN THE OFFICE OF THE REGISTER OF DEEDS IN LINCOLN COUNTY, WISCONSIN AT 4:10 PM ON 3-26-2009 AS DOCUMENT 473642 AND FILED IN LAY #1
Sarah L. Koss
SIGNATURE OF REGISTER OF DEEDS

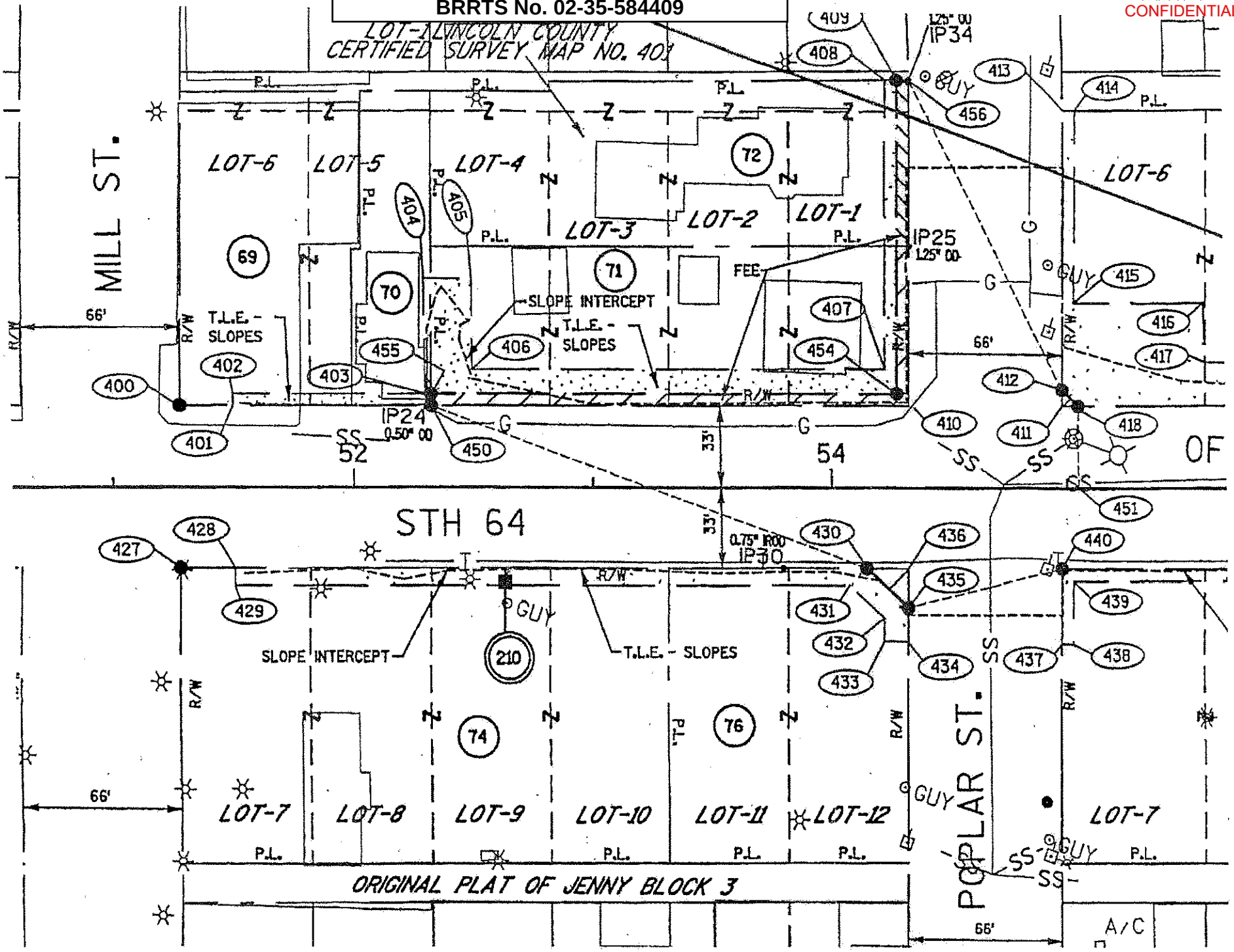
FILE NAME : p:\43xx\4326\rw plot\040105_rw.dgn
APPRAISAL PLAT DATE : 03/18/2009

PLOT DATE : 3/18/2009
PLOT BY : sqc
PLOT NAME :
PLOT SCALE : 1:50

9000-10-21 4.04

CONFIDENTIAL

08/20/09 13:17 FAX 920 749 5038 REG'L ACCTG 007



Full Report

Property Location : **900 E Main St**

View: Full Report View ▼ | Report Options | Print Report | Search Criteria | Search Results | Modify Search

Taxed by: City Of Merrill

Owner:
Bmo Harris Bank Na
Attn Corp Real Estate
24th Floor 111 w Monroe St
Chicago, IL 60603

Taxkey # 25131061230020

Owner Occupied:
Property Address:
900 E Main St
Merrill, WI 54452-2501

ID Walk Down | ID Walk Up

Record 1 of 1 selected records
County: Lincoln
Taxed by: City Of Merrill
Taxkey # 25131061230020

Assessments

Assessment Year	Property Class	Land Assessment	Improvement Assessment	Total Assessment	Percent Of Change	Acres	Ratio
2018	Commercial	$ 41,300	$ 799,700	$ 841,000	0.000 –	0.275	0.968974017
2017	Commercial	$ 41,300	$ 799,700	$ 841,000	0.000 –	0.275	1.019189671
2016	Commercial	$ 41,300	$ 799,700	$ 841,000	-3.367 ↓	0.275	1.108711246
2015	Commercial	$ 79,300	$ 791,000	$ 870,300	0.000 –		1.122611571
2014	Commercial	$ 79,300	$ 791,000	$ 870,300	0.000 –		1.145267228
2013	Commercial	$ 79,300	$ 791,000	$ 870,300	0.000 –		1.052613140
2012	Commercial	$ 79,300	$ 791,000	$ 870,300	0.000 –		0.986656458
2011	Commercial	$ 79,300	$ 791,000	$ 870,300	0.000 –		0.996055530
2010	Commercial	$ 79,300	$ 791,000	$ 870,300	0.000 –		0.995691985

Taxes

Tax Year	Total Tax	First Dollar	Lottery Credit	Net Tax	Special Taxes	Special Assessment	Special Charges	Full Pay Amount	Ratio
2018	$25,663.50	$62.19		$25,601.31				$25,601.31	0.968974017
2017	$24,194.13	$61.19		$24,132.94				$24,132.94	1.019189671
2016				$23,209.07				$23,209.07	1.108711246
2015				$23,495.18				$23,495.18	1.122611571
2014				$23,843.16				$23,843.16	1.145267228
2013				$24,344.53				$24,344.53	1.052613140
2012				$24,427.22				$24,427.22	0.986656458
2011				$24,465.19				$24,465.19	0.996055530
2010				$24,748.39				$24,748.39	0.995691985

Assessor

Building Square Feet :	**Year Built :**	**Township :**	31N
Bedrooms :	**Year Remodeled :**	**Range :**	6E
Full Baths :	**Effective Year Built :**	**Section :**	12
Half Baths :	**Air Conditioning :**	**Quarter :**	
Total Rooms :	**Fireplace :**	**Pool :**	
Number of Stories :	**Number of Units :**	**Attic :**	
Building Type :		**Basement :**	
Exterior Wall :		**Heat :**	
Exterior Condition :		**Garage :**	
Land Use :		**School District :**	3500 Merrill Area
Zoning :		**Historic Designation :**	

Legal Description

Original Plat Of Jenny LTS 5 & 6 BLK 3

Sales

Conveyance Date :	9/30/2019	**Date Recorded :**	10/11/2019	**Value/Sale Price :**	$ 1,505,200.00
Grantor Name :	Bmo Harris Bank N.a.			**Transfer Fee :**	$ 4,515.60
Grantee Name :	BL Branch Group II LLC			**Document# :**	539267
Conveyance Instrument :	Warranty / Condo Deed			**Conveyance Type :**	Sale Or Land Contract

Information is supplied by third parties and has not been verified (2019)

F.3.b. Verification of Zoning
BRRTS No. 02-35-584409

Full Report

Property Location : **S Mill St**

View: Full Report View ▼ | Report Options | Print Report | Search Criteria | Search Results | Modify Search

Taxed by: City Of Merrill

Owner:
Bmo Harris Bank Na
Attn Corp Real Estate
24th Floor 111 w Monroe St
Chicago, IL 60603

Taxkey # 25131061230021

Owner Occupied:
Property Address:
S Mill St
Merrill, WI

ID Walk Down | ID Walk Up | Quit ID Walk

County: Lincoln
Taxed by: City Of Merrill
Taxkey # 25131061230021

Assessments

Assessment Year	Property Class	Land Assessment	Improvement Assessment	Total Assessment	Percent Of Change	Acres	Ratio
2018	Commercial	$ 62,500	$ 97,700	$ 160,200	0.000 –	0.562	0.968974017
2017	Commercial	$ 62,500	$ 97,700	$ 160,200	0.000 –	0.562	1.019189671
2016	Commercial	$ 62,500	$ 97,700	$ 160,200	-1.355 ↓	0.562	1.108711246
2015	Commercial	$ 82,500	$ 79,900	$ 162,400	0.000 –		1.122611571
2014	Commercial	$ 82,500	$ 79,900	$ 162,400	0.000 –		1.145267228
2013	Commercial	$ 82,500	$ 79,900	$ 162,400	0.000 –		1.052613140
2012	Commercial	$ 82,500	$ 79,900	$ 162,400	0.000 –		0.986656458
2011	Commercial	$ 82,500	$ 79,900	$ 162,400	0.000 –		0.996055530
2010	Commercial	$ 82,500	$ 79,900	$ 162,400	0.000 –		0.995691985

Taxes

Tax Year	Total Tax	First Dollar	Lottery Credit	Net Tax	Special Taxes	Special Assessment	Special Charges	Full Pay Amount	Ratio
2018	$4,888.59	$62.19		$4,826.40				$4,826.40	0.968974017
2017	$4,608.68	$61.19		$4,547.49				$4,547.49	1.019189671
2016				$4,371.24				$4,371.24	1.108711246
2015				$4,333.15				$4,333.15	1.122611571
2014				$4,394.79				$4,394.79	1.145267228
2013				$4,492.78				$4,492.78	1.052613140
2012				$4,510.89				$4,510.89	0.986656458
2011				$4,514.79				$4,514.79	0.996055530
2010				$4,564.40				$4,564.40	0.995691985

Assessor

Building Square Feet :	**Year Built :**	**Township :**	31N
Bedrooms :	**Year Remodeled :**	**Range :**	6E
Full Baths :	**Effective Year Built :**	**Section :**	12
Half Baths :	**Air Conditioning :**	**Quarter :**	
Total Rooms :	**Fireplace :**	**Pool :**	
Number of Stories :	**Number of Units :**	**Attic :**	
Building Type :		**Basement :**	
Exterior Wall :		**Heat :**	
Exterior Condition :		**Garage :**	
Land Use :		**School District :**	3500 Merrill Area
Zoning :		**Historic Designation :**	

Legal Description

Original Plat Of Jenny LTS 7-8-9-10 BLK 3

Sales

Information is supplied by third parties and has not been verified (2019)

2018 Property Records for City of Merrill, Lincoln County

Tax key number: 251-3106-123-0021

Property address: S Mill St

Traffic / water / sanitary: Medium / City water / Sewer

Legal description: ORIGINAL PLAT OF JENNY LTS 7-8-9-10 BLK 3 *788, parcel # 34 000036 000 788 00 00

Summary of Assessment	
Land	$62,500
Improvements	$97,700
Total value	$160,200

Land

Qty	Land Use	Width	Depth	Square Feet	Acres	Water Frontage	Description	Assess Value
1	Commercial	120	204	24,480	0.562	None		$62,500

Commercial Building (BMO Harris Bank - Drive-Up)

Section name: Section 1
Year built: 1970
% complete: 100%
Stories: 1.00
Perimeter: 68 LF
Total area: 240 SF (all stories)

Occupancies

Designed Use	Actual Use	Units	Area per Unit	Construction Class	Avg Ht	Quality	CDU
Mini-bank	Bank/Savings Institution	1	240	Masonry bearing walls	10.00	C (AV)	Average

	Component Description	Count	Stops	Area (sf)	Area (%)	Quality
Exterior walls	Brick with Block Back-up			240	100.0%	C (AV)
HVAC	Package unit			240	100.0%	C (AV)

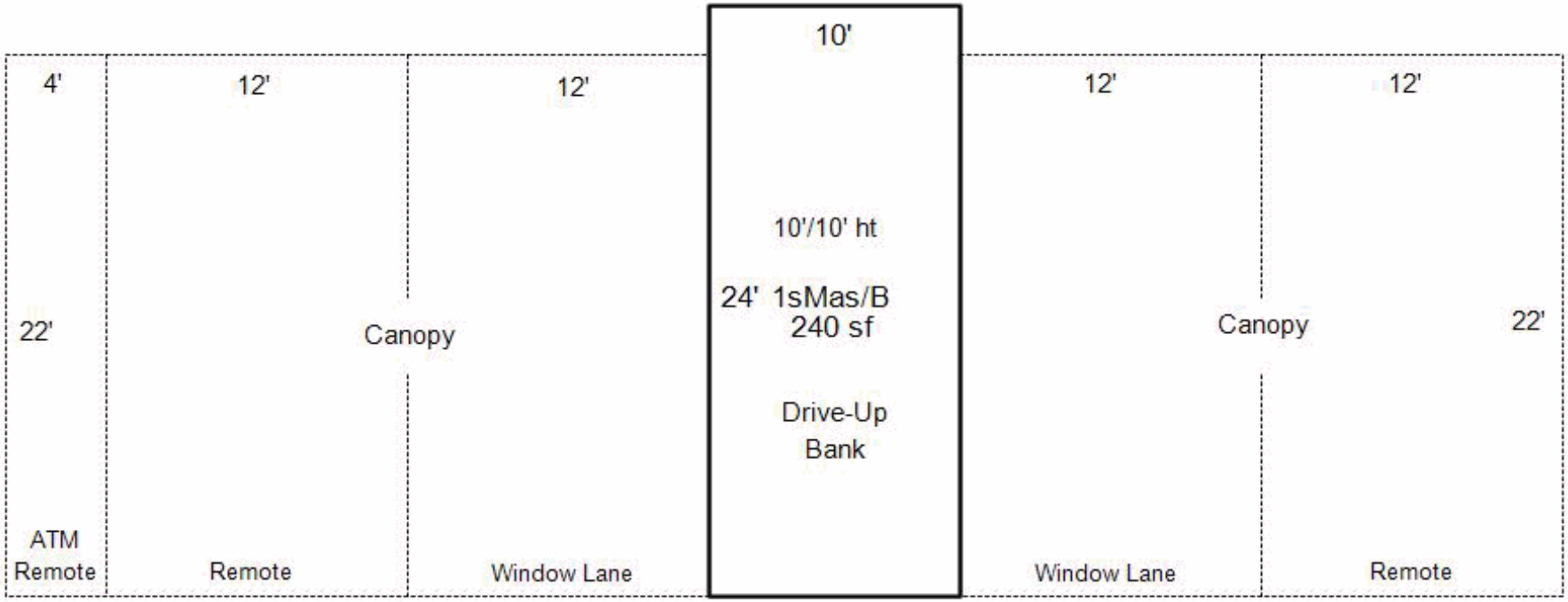
Section 1 basement

Levels: 1.00
Perimeter: 68 LF
Total area: 240 SF (all levels in basement)

Occupancies

Designed Use	Actual Use	Units	Area per Unit	Basement Type	Construction Class	Avg Ht	Quality	CDU
Mini-bank	Support area	1	240	Unfinished	Masonry bearing walls	10.00	C (AV)	Average

	Qty	Description	Units	Grade	Location	Yr Blt	Condition
Other features	1	Bank Canopy	1,144	C		1970	Av
Other features	1	Remotes	3	C		1970	Av


10'
4'
12'
12'
12'
12'
10'/10' ht
24' 1sMas/B
240 sf
22'
Canopy
Canopy
22'
Drive-Up
Bank
ATM
Remote
Remote
Window Lane
Window Lane
Remote

# of identical OBIs: 1	Other Building Improvement (OBI)				
Main Structure				Modifications (Type, Size)	Photograph
OBI type: Commercial Paving Const type: Asphalt Year built: 2000	Width: 20,000 LF Depth: 1 LF Flr area: 20,000 SF	Grade: D Condition: Average % complete: 100%			not available

2018 Property Records for City of Merrill, Lincoln County

Tax key number: 251-3106-123-0020

Property address: 900 E Main St

Traffic / water / sanitary: Medium / City water / Sewer

Legal description: ORIGINAL PLAT OF JENNY LTS 5 & 6 BLK 3 *786, parcel # 34 000036 000 786 00 00

Summary of Assessment	
Land	$41,300
Improvements	$799,700
Total value	$841,000

Land

Qty	Land Use	Width	Depth	Square Feet	Acres	Water Frontage	Description	Assess Value
1	Commercial	100	120	12,000	0.275	None		$41,300

Commercial Building (BMO Harris Bank)

Section name: Section 1
Year built: 1979
% complete: 100%
Stories: 1.00
Perimeter: 428 LF
Total area: 8,464 SF (all stories)

Occupancies

Designed Use	Actual Use	Units	Area per Unit	Construction Class	Avg Ht	Quality	CDU
Bank	Bank/Savings Institution	1	8,464	Masonry bearing walls	14.00	C (AV)	Average

	Component Description	Count	Stops	Area (sf)	Area (%)	Quality
Exterior walls	Brick, Solid			6,771	80.0%	C (AV)
	Concrete Block, Textured Face			1,693	20.0%	C (AV)
HVAC	Package unit			8,464	100.0%	C (AV)

Section 1 basement

Levels: 1.00
Perimeter: 428 LF
Total area: 8,464 SF (all levels in basement)

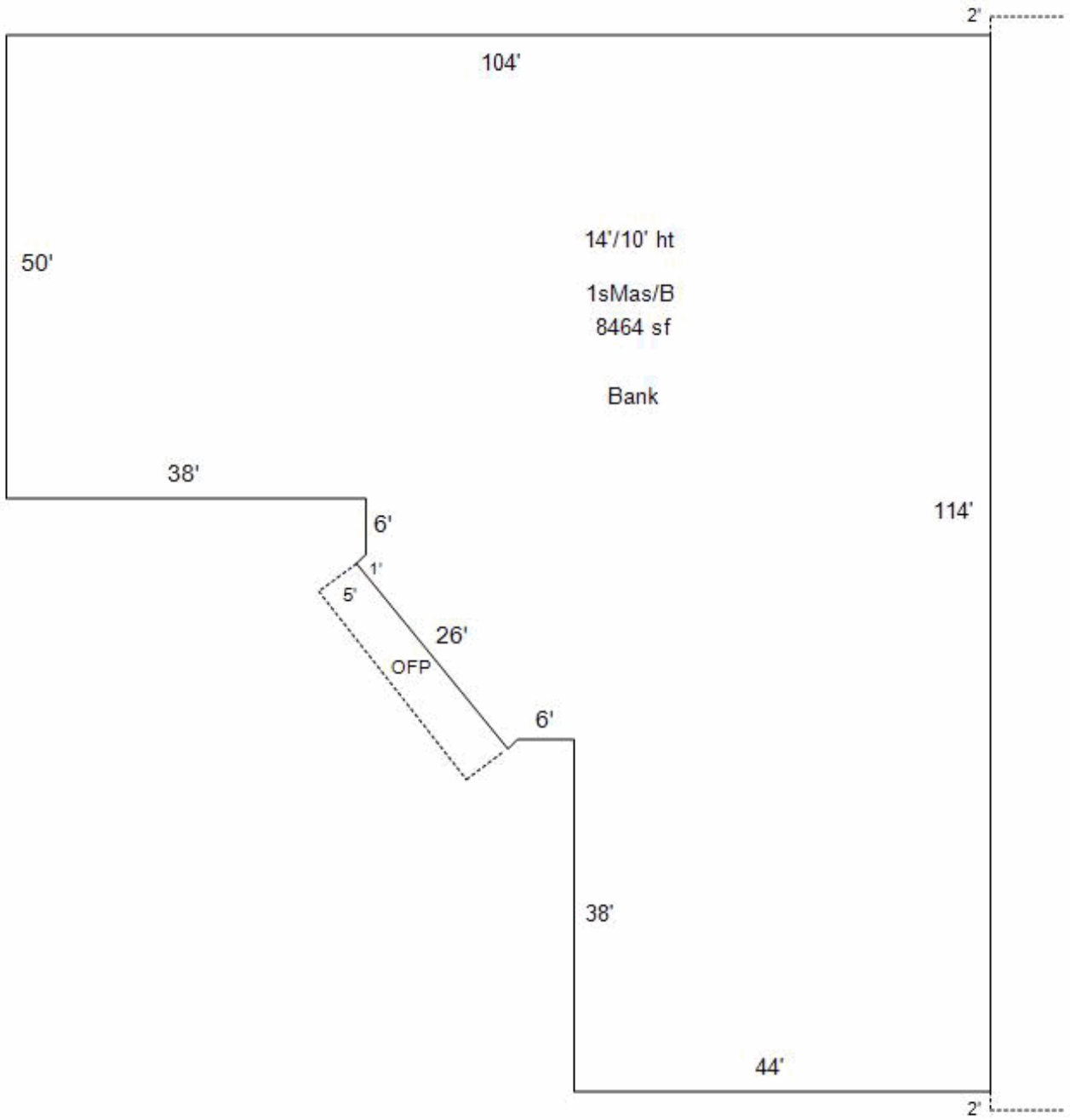
Occupancies

Designed Use	Actual Use	Units	Area per Unit	Basement Type	Construction Class	Avg Ht	Quality	CDU
Bank	Support area	1	8,464	Semifinished	Masonry bearing walls	10.00	D (FR)	Fair

	Component Description	Count	Stops	Area (sf)	Area (%)	Quality
HVAC	Package unit			8,464	100.0%	C (AV)

Other features

Qty	Description	Units	Grade	Location	Yr Blt	Condition
1	OFP	130	C		1979	Av


2'
104'
14'/10' ht
50'
1sMas/B
8464 sf
Bank
38'
114'
6'
1'
5'
26'
OFP
6'
38'
44'
2'

2018 Property Records for City of Merrill, Lincoln County

Building Permits				
Issued	**Permit #**	**Purpose**	**$ Amount**	**Completed**
2/18/2015	15012	Electrical	$0	

Sales History		
Date	**Price**	**Type**

ATTACHMENT G

(Notifications to Owners of Affected Properties)

BRRTS No. 02-35-584409

BMO Harris Bank Branch
900 E. Main Street
Merrill, Wisconsin 54452

(The known PAH and Cadmium soil fill contamination does not extend beyond the property boundaries of the Subject Property. As such, no surrounding property owners were notified.)