

## Lauridsen, Keld B - DNR

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**From:** Brian Youngwirth <[byoungwirth@generalengineering.net](mailto:byoungwirth@generalengineering.net)>  
**Sent:** Thursday, February 6, 2020 11:30 AM  
**To:** Lauridsen, Keld B - DNR  
**Cc:** becky.rlewistechologies.com; Garritt R. Bader; Lynn Bradley  
**Subject:** Former Neighborhood Cleaners Work Plan  
**Attachments:** R Lewis Proposed Aldis Work Plan.pdf

Keld, in accordance with our discussion today, I am sending this Site Investigation Work Plan for Neighborhood Cleaners in Appleton. It is understood that the WDNR BRRS No. will be assigned sometime this week and the address of the release may be modified by the WDNR, which will be reflected in any future correspondence. After your review of the Work Plan, please let GEC know if you have any comments or concerns regarding how we move forward with the construction and investigative/remedial activities recommended. A copy of the Work Plan will also be sent by mail.

Thank you,

Brian Youngwirth  
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Restaurant, Pinnacle Therapy Solutions, Coin Laundry, and a vacant memorabilia store (former Neighborhood Cleaners).

Responsible Party: R Lewis & R Lewis, LLC  
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#### Authorization

Authorization to prepare this Site Investigation Work Plan was provided by Ms. Rebecca Lewis of R Lewis & R Lewis, LLC, the responsible party (RP) and current owner of the property.

#### Site Features

The Site consists of five land parcels, including Parcel IDs 316286100 (0.1249-acres), 316286000 (0.3077-acres), 316769200 (0.2914-acres), 316769100 (0.2757-acres), and the western half of parcel 316770400 (2.9627-acres). Parcel 316770400 is currently occupied by a commercial strip mall with addresses of 621 West Northland Avenue and 2702 North Richmond Street. The strip mall is comprised of 5 units currently occupied from west to east by a vacant former muffler repair shop, Pho House Restaurant, Pinnacle Therapy Solutions, Coin Laundry, and a vacant sports memorabilia store. The remaining parcels comprising the Subject Site consist of vacant land. It is understood that residential homes formerly occupied at least two of the parcels (316769100 and 316769200) and have been recently demolished. The Subject Site is located on the east side of North Richmond Street with the Northwest ¼ of the Northwest ¼ of Section 23, Township 21 North, Range 17 East. A Site Location Map is shown on Figure 1, Appendix A. A site plan is shown on Figure 2, Appendix A.

The topography of the Subject Site and surrounding area is relatively flat with a down-gradient slope toward the east. The subject site is serviced by the City of Appleton municipal water and sewer system.

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The Site is bound to the north by an access drive, followed by Fazoli's and Starbucks; to the south by Weekend Dental Associates School, J & J Electronics and residential properties; to the east by Play It Again Sports and residential properties; and to the west by North Richmond Street, followed by Associated Bank, BP Gasoline Station, Chester's Pub, and Richmond Street Inn.

### Background

GEC was retained by GB Real Estate Investments, LLC (prospective purchaser of the property) on September 30, 2019, to perform a Phase I ESA on the Site. During the preliminary research for the Phase I ESA and through review of a prior Phase I ESA performed by GME Consultants, Inc., dated August 31, 1990, provided to GEC by the current owner of the property, several RECs were identified in connection with the Subject Site, which are identified below.

1. The western portion of the existing building had been utilized as a vehicle maintenance facility for several decades. According to review of the prior Phase I ESA, five hydraulic lifts were formerly utilized within the building and are believed to have leaked. These hoists were eventually converted to aboveground mechanical hoists. The former hoist locations were not visible during the site visit performed by GEC. A hoist pit was also reportedly present within the service garage at the time of the prior Phase I ESA, which was not visible at the time of GEC's site visit. The hoist pit reportedly continually filled with groundwater.
2. According to review of the prior Phase I ESA, aboveground storage tanks (ASTs) containing fuel oil and waste oil were observed outside of the building. In addition, other ASTs and barrels containing hydraulic fluid and other unidentified contents were stored outside of the building. A former building was also identified in the prior Phase I ESA, just north of the existing building, and several other barrels and an AST were observed outside the eastern end of that building. A 20-gallon waste oil spill was indicated to have occurred on the Site from leaking barrels in 1988. The spill case was closed by the WDNR.
3. According to the current owner of the Subject Site, the eastern portion of the existing building was formerly utilized as a dry-cleaning facility during the 1990s. Ms. Rebecca Lewis provided GEC with a floor plan of the former dry-cleaning facility.
4. A former LUST case (Shell Station at 2619 North Richmond Street) and presently operating BP gasoline station is present on the western adjoining property, beyond North Richmond Street. The LUST case was closed by the WDNR on March 16, 2000. GEC reviewed the case file on the WDNR BRRTS website. Monitoring wells installed at the eastern limits of that property reportedly contained petroleum contaminants exceeding the NR 140 enforcement standard (ES) at the time of closure and no monitoring wells were installed beyond the eastern limits of the Shell Station property at that time. Groundwater flow was identified to be toward the east. GEC also reviewed a Phase 2.5 Report prepared by TRC, dated October 7, 2014, which identified soil and groundwater contamination within the western portion of the North Richmond Street Right-Of-Way (ROW). Therefore, it does not appear that the eastern limits of the groundwater contamination (toward the Site) were defined and the property has continued to operate as a gasoline station since case closure in 2000.

Due to the above identified RECs, GB Real Estate Investments, LLC requested that the Phase I ESA be terminated and the Limited Phase II ESA be performed in conjunction with geotechnical activities being performed for the planned Aldi's development.

The scope of the initial Limited Phase II ESA and geotechnical activities included the advancement of 18 total soil borings, nine of which were evaluated for environmental purposes, including B-1, B-2, and B-12



to B-18. A Geotechnical Report, dated November 21, 2019, was prepared by Gestra under a separate contract.

On October 29, 2019, GEC personnel was present to oversee the advancement of soil borings B-1, B-2, and B-12 to B-18. Soil borings B-1, B-12, B-14, and B-17 were converted to temporary monitoring wells (TW-1 to TW-4) to depths of 15 feet below ground surface (bgs). The soil borings were performed by Gestra Engineering, Inc. of Milwaukee, Wisconsin. Soil samples were collected from B-1, B-12 to B-16, and B-18 and submitted for laboratory analysis for the presence of volatile organic compounds (VOCs). Groundwater samples were collected from temporary wells TW-1 to TW-4 and the open borehole in B-2 and submitted for laboratory analysis for the presence of VOCs. Groundwater samples were collected from the temporary monitoring wells or geotechnical borings utilizing a plastic bailer. Upon completion of the soil and water testing, the boreholes and temporary wells were abandoned with bentonite.

The soil sample collected from the B-1 at a depth of 4.5 to 6 feet bgs reported tetrachloroethene (PCE) at a concentration of 151 micrograms per kilogram ( $\mu\text{g}/\text{kg}$ ), which exceeds its Wisconsin Administrative Code (WAC) NR 720 soil to groundwater RCL of 4.5  $\mu\text{g}/\text{kg}$ . None of the other soil samples reported detectable concentrations of VOCs.

The groundwater samples collected from temporary wells TW-1 and TW-4 reported PCE at concentrations of 0.69J micrograms per liter ( $\mu\text{g}/\text{L}$ ) and 0.87J  $\mu\text{g}/\text{L}$ , respectively, which exceed the WAC NR 140 PAL of 0.5  $\mu\text{g}/\text{L}$  for PCE. No other VOCs were detected at concentrations exceeding their respective standards at any of the other test locations.

GEC prepared a Limited Phase II ESA Report, dated December 3, 2019. As a result of the testing GEC, recommended that the WDNR be notified of a release and that additional testing be performed near B-1, TW-1, and TW-4 to further evaluate the potential degree and extent of identified soil and groundwater contamination.

On January 13, 2020, GEC was present on-site to oversee the advancement of soil probes GP-19 to GP-27. Soil probes GP-19, GP-20, GP-21, GP-23, GP-24, and GP-26 were converted to temporary monitoring wells designated TW-5 to TW-10, respectively, to depths of 15 feet below ground surface (bgs). Temporary wells TW-5 to TW-10 remain in-place on the site.

The soil samples collected from GP-24 at a depth of 6 to 7 feet bgs; GP-25 at a depth of 2 to 3 feet bgs, and GP-26 at a depth of 6 to 7 feet bgs reported PCE concentrations of 135  $\mu\text{g}/\text{kg}$ , 79J  $\mu\text{g}/\text{kg}$ , and 64J  $\mu\text{g}/\text{kg}$ , respectively, exceeding its NR 720 soil to groundwater RCL of 4.5  $\mu\text{g}/\text{kg}$ . The soil samples collected from GP-24 at a depth of 3 to 4 feet bgs and GP-25 at a depth of 2 to 3 feet bgs reported concentrations of trichloroethene (TCE) ranging from 42J  $\mu\text{g}/\text{kg}$  to 98J  $\mu\text{g}/\text{kg}$ , respectively, exceeding its NR 720 soil to groundwater RCL of 3.6  $\mu\text{g}/\text{kg}$ .

The groundwater samples collected from temporary wells TW-8, TW-9, and TW-10 reported PCE at concentrations of 76  $\mu\text{g}/\text{L}$ , 166  $\mu\text{g}/\text{L}$ , and 22.5  $\mu\text{g}/\text{L}$ , respectively, which exceed their respective NR 140 ES of 5  $\mu\text{g}/\text{L}$ . The groundwater samples collected from TW-8, TW-9, and TW-10 also reported TCE at concentrations of 1.32  $\mu\text{g}/\text{L}$ , 1.68  $\mu\text{g}/\text{L}$ , and 0.67J  $\mu\text{g}/\text{L}$ , respectively, which exceed its NR 140 PAL of 0.5  $\mu\text{g}/\text{L}$ . No other VOCs were detected at concentrations exceeding their respective standards at any of the other test locations.

The locations of the soil borings and monitoring wells are shown on Figure 3, Appendix A. The soil and groundwater analytical results are summarized on Tables 1 and 2, Appendix B, respectively.

Based on the test results, it appeared a release had occurred as a result of the former use of the property as a dry-cleaning facility; however, none of the other test results identified releases from the other

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identified RECs. At the request of Rebecca Lewis, GEC notified the WDNR of a release on January 31, 2020. GEC was retained to perform a site investigation.

#### Regional Geology and Hydrogeology

According to the United States Department of Agriculture (USDA) soil survey, soils on the site consist of the Kewaunee silt loam. The geologic deposits are associated with ground moraines with a parent material of loess over clayey till and/or calcareous, dense clayey till. The "Depth to Bedrock Map of Wisconsin" indicates bedrock in the area to be Ordovician age Prairie Du Chien Group dolomite with some sandstone and shale occurring at depths ranging from 30 feet to 100 feet below grade. Based on the previous work performed on the site, groundwater occurs at depths less than 10 feet bgs. The horizontal flow appears to be toward the east/southeast.

#### Work Plan – Area Potable and Municipal Wells

The site and surrounding properties are currently service by municipal water services. GEC will evaluate the locations and construction of any identifiable potable or municipal wells within 1,200 feet of the site. Pending the results of the soil and groundwater testing, GEC will evaluate the likelihood that any nearby wells (if any) have been impacted by this release. No other sensitive species, habitat, ecosystem, wetlands, or outstanding resource waters are located in the direct vicinity of the affected area.

#### Work Plan – Vapor Investigation

The building on the site is planned to be demolished beginning on approximately April 1, 2020, with construction of the new building beginning after the site preparation in the summer of 2020. A site plan showing the planned future site layout is shown on Figure 2A, Appendix A. No vapor testing is recommended within the current building on the site, due to the planned demolition activities. As a precaution, it was recommended and is planned for a vapor mitigation system to be installed beneath the floor slab of the new Aldi's building. The vapor mitigation system plans are not currently available. Upon receipt of the vapor mitigation system plans, a copy will be provided to the WDNR. It is planned that clay plugs be installed at the locations where utilities enter the building, to prevent vapor migration along the utility corridors and into the building. Utilities will be routed away from the contamination present near northeast corner of the planned Aldi's building, if possible. Subsequent to construction of the Aldi's building, sub-slab air samples will be collected beneath the floor slab of the new building and tested for VOCs. Pending the test results, the system will be activated, if necessary. Additionally, pending the outcome of the other planned soil and groundwater testing (discussed below), and the proximity of the soil and groundwater contaminant plumes to remaining and new utility lines and other nearby buildings, additional vapor testing of utility corridors or sub-slab vapor testing of nearby buildings may be necessary.

#### Work Plan – Soil and Groundwater Testing Pre-Construction and Initial Construction of Aldi's Building

Due to the planned construction of the Aldi's building, it is recommended that groundwater samples be collected from small diameter monitoring wells TW-5 to TW-10, prior to the construction activities to further evaluate contaminant concentrations within groundwater prior to the construction activities. The groundwater samples will be submitted for laboratory analysis of VOCs. Small diameter wells TW-5 to TW-10 will likely have to be abandoned during the demolition and/or construction activities.

A floor plan of the former dry cleaner layout, showing the location of the former dry-cleaning machine, was provided to GEC by the current owner. The floor plan also shows two exit/loading doors in the rear of the building (southeast corner), near the area of the identified PCE and TCE. The location of the

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former dry-cleaning machine is shown of Figure 2, Appendix A. Therefore, subsequent to the building demolition, it is recommended that a few test pits be performed and that soil samples be collected from the upper four feet of soil in the area of the former dry cleaning machine and near the south wall of the rear exit/loading doors in order to determine the potential source of the release (dry cleaning machine, dumping, drum leakage, etc.). If possible, grab groundwater samples may be collected from the test pits at that time.

Prior to the excavation of any footing or utility excavations for the new Aldi's building, GEC will acquire landfill approval of the contaminated soils. Footing excavations are not planned to extend below a depth of 4 feet bgs. All soils from the northern footing line and those removed from the northeast corner of the new building and extending south to at least B-4 will be removed and transported to a landfill for proper disposal. In addition, soils removed from utility trenches or interior column pads within the northeast portion of the planned building will be removed and transported to a landfill for proper disposal. GEC personnel will be present during the excavations of the foundations and utilities.

#### Work Plan – Post Construction of Aldi's

It is recommended the proposed NR 141 monitoring wells are not installed until after the Aldi's construction is complete, due to the likelihood that the wells will become damaged or destroyed during the construction activities, subject to the concurrence of the WDNR.

The purpose of the proposed post-construction site investigation activities will be to further evaluate the vertical and horizontal extent of petroleum affected soils and groundwater on the subject site. Dependent upon the findings of this study, it may be possible to request case closure. However, if this phase is not sufficient in determining the extent of the affected zones, it may be necessary to perform additional exploratory work in order to fully evaluate on-site and off-site conditions.

The post-construction field exploration for this site investigation will consist of five (5) soil borings to depths of up to 15 feet below ground surface (bgs). Five (5) of the soil borings will be converted to monitoring wells, however pending field observations, additional borings could be converted to monitoring wells, if necessary. The approximate locations of the planned soil borings/monitoring wells are shown on Figure 4, Appendix A.

The soil borings will be advanced with a truck mounted drill rig, and samples will be secured at 2-foot intervals throughout the depth of the borings. The soil samples obtained will be subjected to testing in the field with a Mini Rae Photo Ionization Detector (PID), to test for the presence of volatile vapors. Selected companion samples from the estimated soil boring locations will be submitted for analytical testing to determine the levels of VOCs. One soil sample from the upper four feet of each boring will be submitted for laboratory analysis.

The monitoring well construction will consist of a 10-foot section of 2-inch diameter, machine slotted PVC screen placed at or near the bottom of the borehole. This will be surrounded by a properly graded granular filter medium in the annular space, with unslotted riser pipe extending from the screened section to about 6 inches below the ground surface. A bentonite seal of approximately 2 feet will be placed above the granular filter medium. The remaining annular space will be filled to the ground surface with a mixture of bentonite and Portland cement, or bentonite chips. Flush mounted protective covers will be used to protect the wells.

GEC will develop the monitoring wells by alternately surging and purging with a bailer. The wells will be bailed until the wells are dry, or until they produce relatively sediment-free water. The development water will be placed into drums until after receipt of the testing results of the wells. Well development tools will be cleaned with a detergent solution and potable water followed with multiple rinses of distilled water prior to development of each well. Water samples for laboratory analysis will be obtained from each well



utilizing a single use disposable polyethylene bailer. The groundwater samples obtained from each of the monitoring wells will be submitted for analytical testing for the presence VOCs. Groundwater elevations and the top of casing elevation at the newly installed monitoring wells will be established using conventional surveying techniques. Elevations will be referenced to a temporary benchmark, which will be established on site. Static groundwater levels within the wells will be measured to the nearest 0.01 feet, prior to obtaining the samples for analysis.

The installation of the monitoring wells, and the sample collection and analysis will be performed in general accordance with the guidelines and codes utilized by the WDNR. The samples for chemical analysis will be properly collected and preserved in containers provided by the laboratory. The samples will be placed on ice and standard chain-of-custody procedures will be utilized. The sampling tools will be properly cleaned during the course of the field-testing.

Following the completion of the soil testing performed after the demolition activities, a Status Update Report will be prepared. A report will also be prepared subsequent to the vapor testing work, and to further document the investigation/remedial activities, and provide a timeline for the installation of the soil borings/monitoring wells.

If you have any questions, please contact GEC at (608) 742-2169.

Sincerely,

**GENERAL ENGINEERING COMPANY**



Brian Youngwirth

Environmental Project Manager



Lynn M. Bradley

Environmental Project Manager

Appendix A: Figures

Appendix B Tables

cc: R Lewis & R Lewis, LLC  
GB Real Estate Investments, LLC

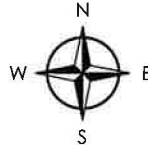
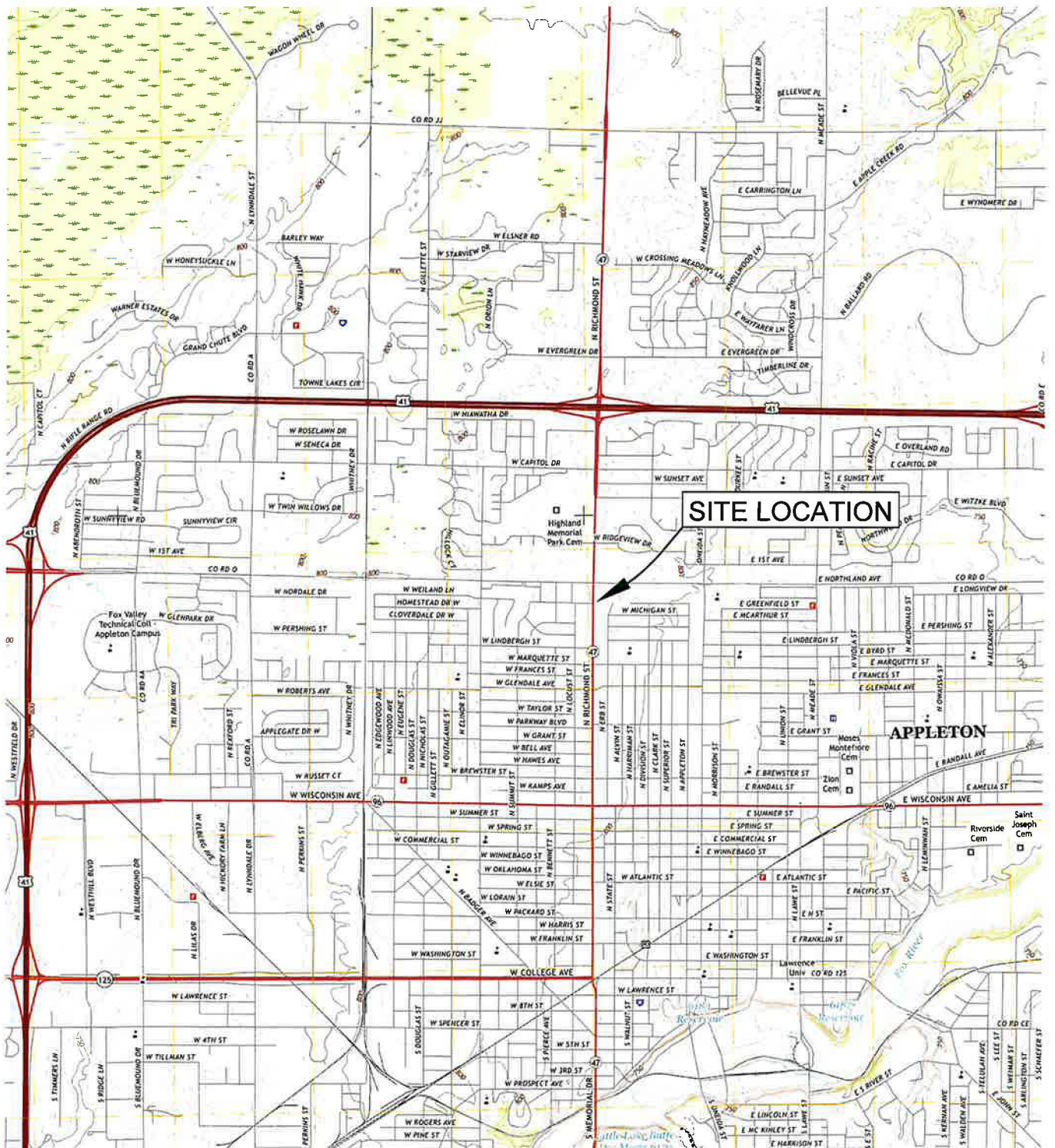
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**APPENDIX A**  
**FIGURES**



**General Engineering Company**

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**SITE LOCATION MAP**

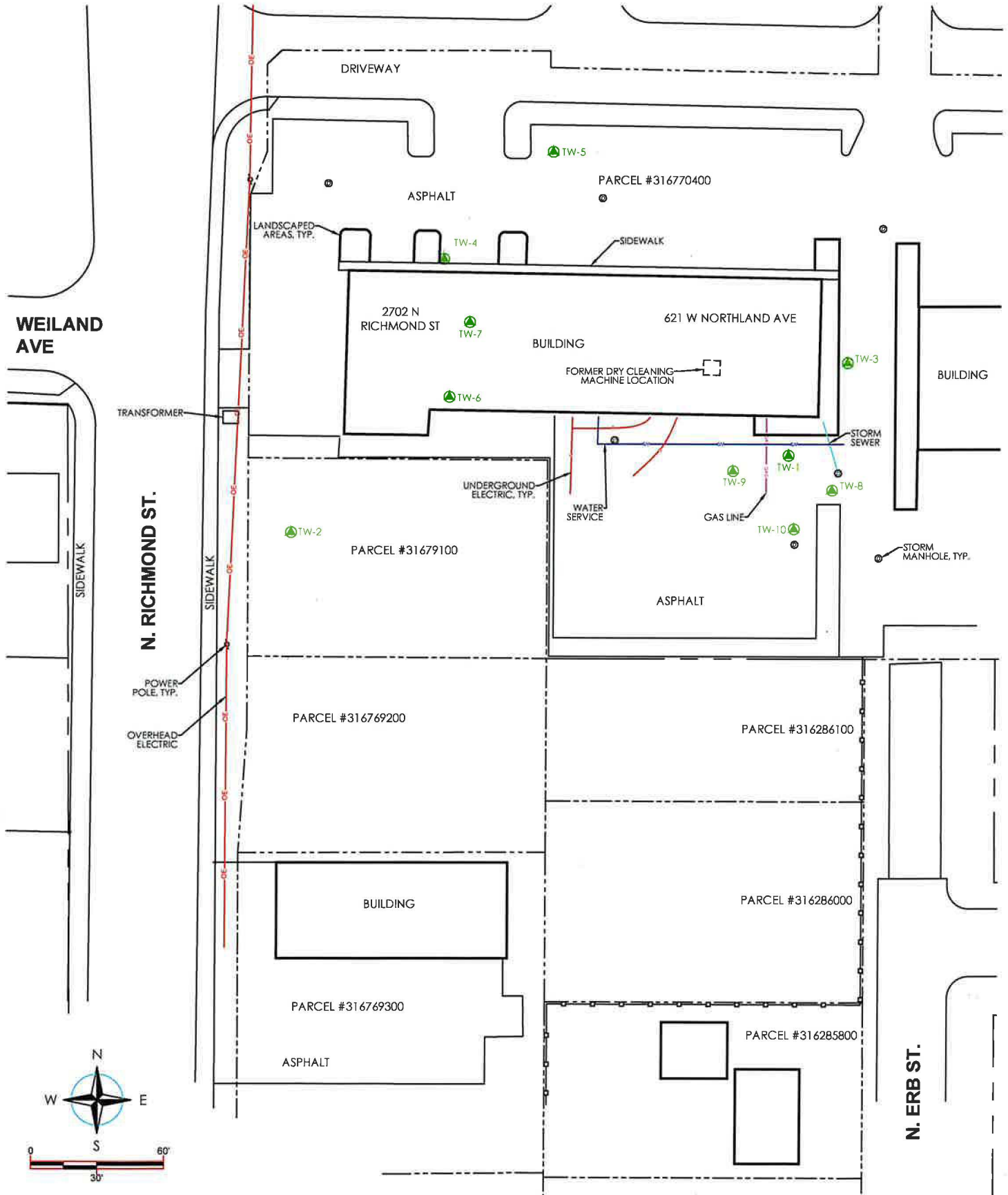
**FORMER NEIGHBORHOOD CLEANERS**  
**2702 N RICHMOND AVE**  
 CITY OF APPLETON  
 OUTAGAMIE COUNTY, WI

**GEC**

DRAWN BY	KP
REVIEWED BY	LMB
ISSUE DATE	FEB 2020
GEC FILE NO.	2-0120-82
SHEET NO.	

**FIGURE 1**





**LEGEND**

- EXISTING PROPERTY LINE
- SOIL BORING/SMALL DIAMETER MONITORING WELL

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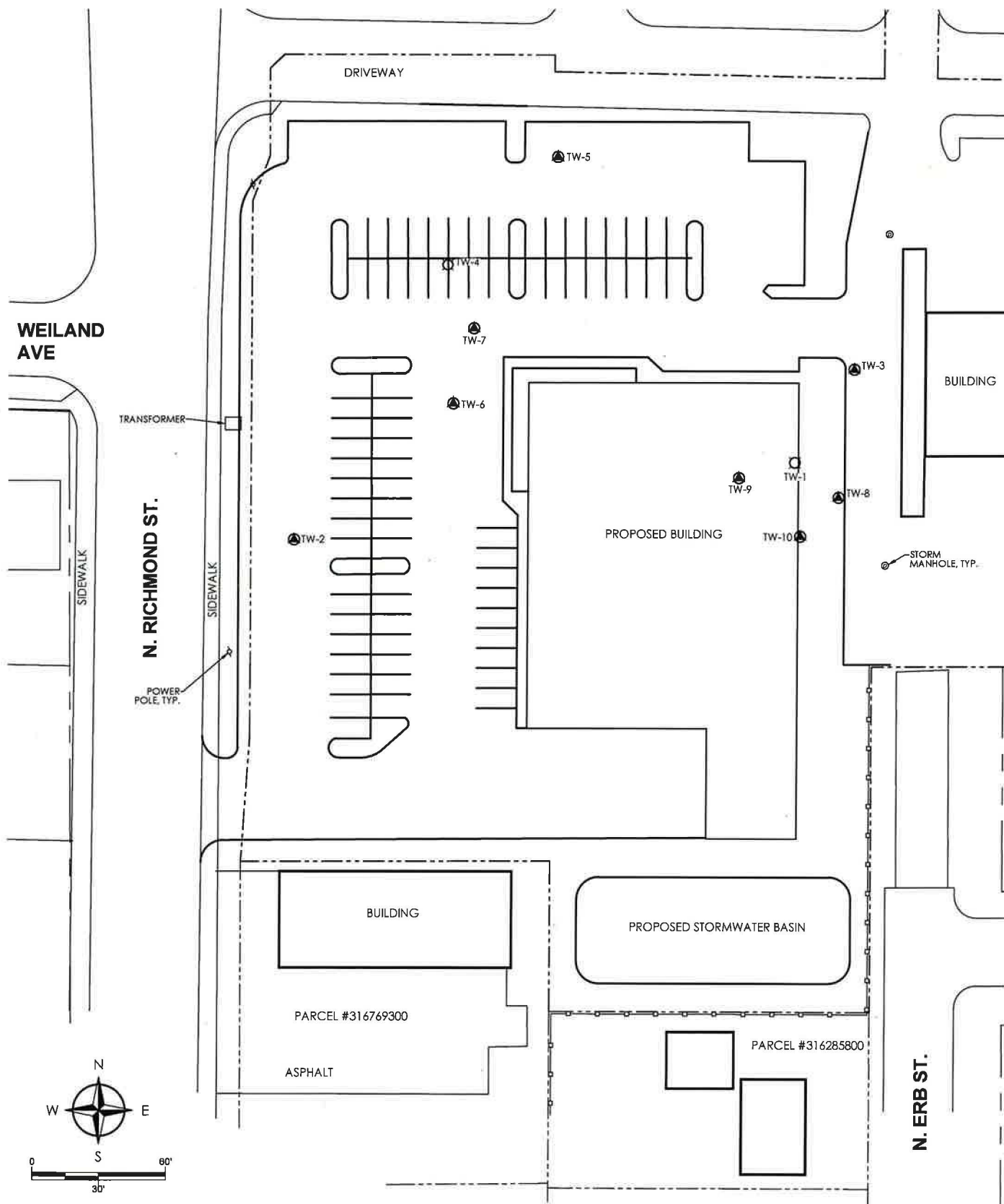
**SITE PLAN**

**FORMER NEIGHBORHOOD CLEANERS**  
**621 W. NORTHLAND AVENUE**  
 CITY OF APPLETON  
 OUTAGAMIE COUNTY, WI



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**FIGURE 2**



**LEGEND**

- EXISTING PROPERTY LINE
- TW-1  SMALL DIAMETER MONITORING WELL
- TW-1  ABANDONED SMALL DIAMETER MONITORING WELL

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**PROPOSED SITE PLAN**

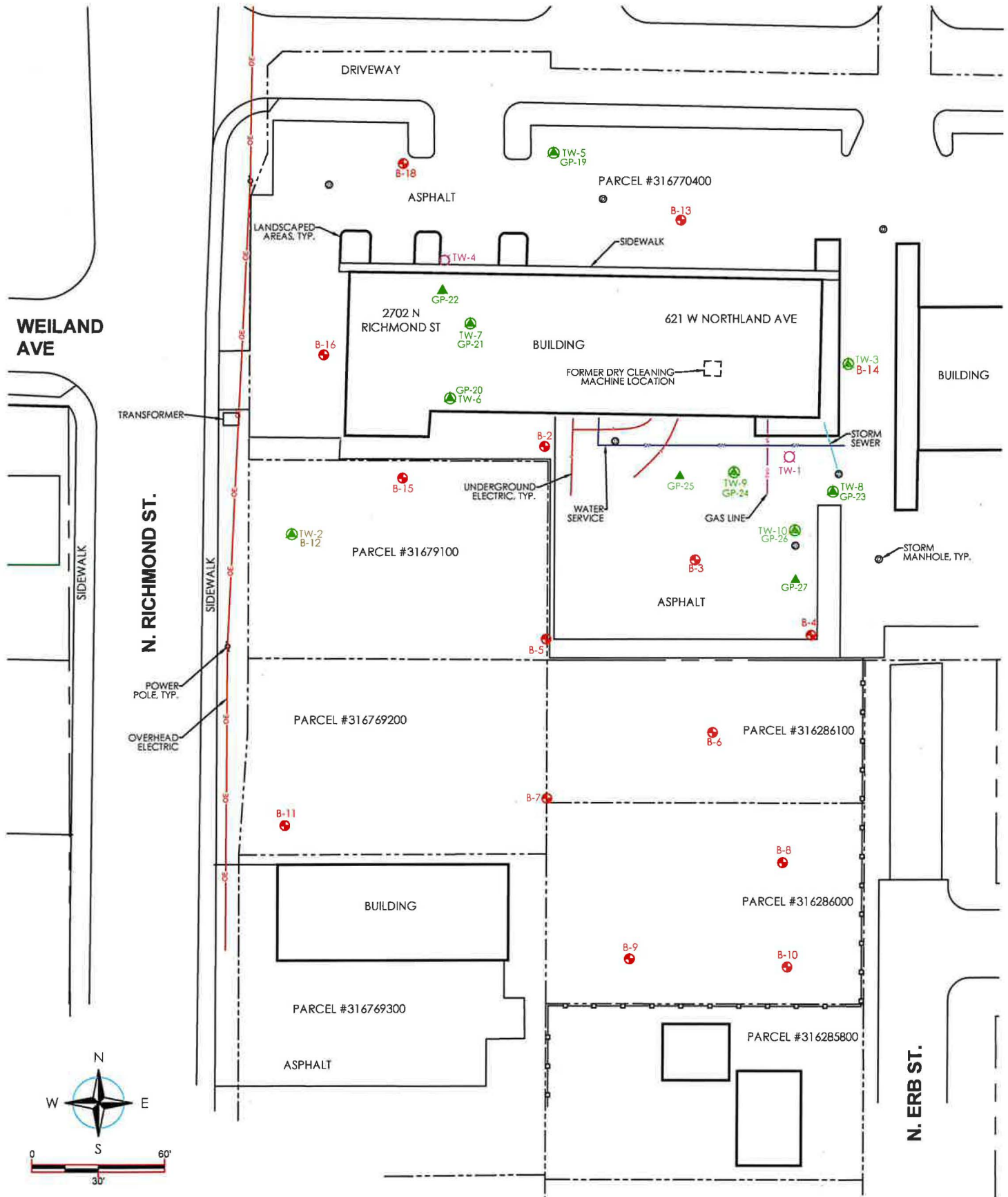
**PROPOSED ALDI'S**

CITY OF APPLETON  
 OUTAGAMIE COUNTY, WI



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**FIGURE 2A**



**LEGEND**

- EXISTING PROPERTY LINE
- TW-1 SOIL BORING/SMALL DIAMETER MONITORING WELL
- TW-b-1 ABANDONED SOIL PROBE/SMALL DIAMETER MONITORING WELL
- B-2 SOIL BORING
- GP-1 GEOPROBE

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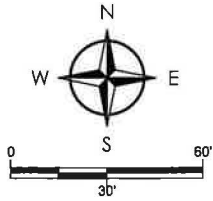
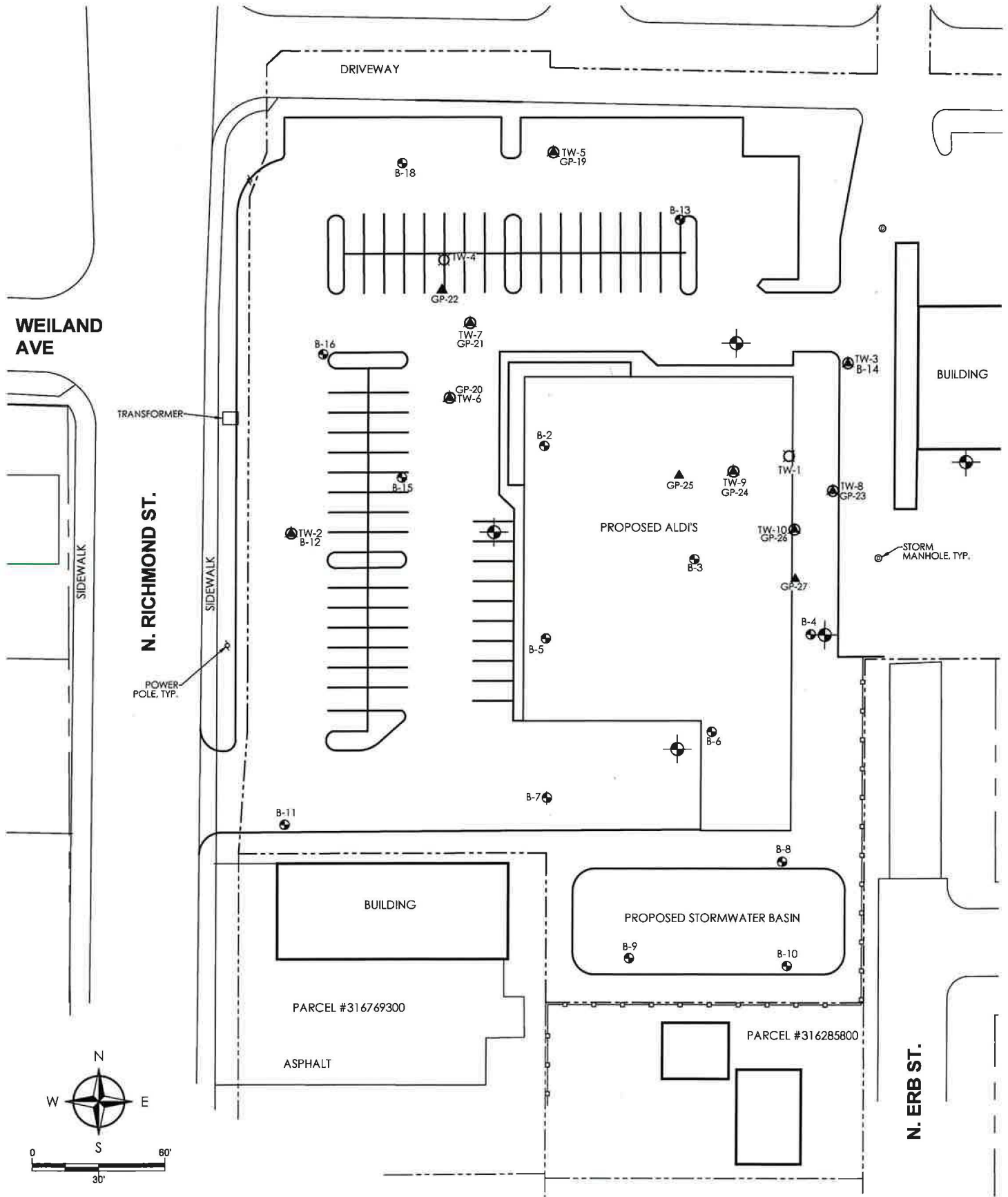
**SOIL BORING & SMALL DIAMETER  
 MONITORING WELL LOCATIONS  
 FORMER NEIGHBORHOOD CLEANERS  
 621 W. NORTHLAND AVENUE  
 CITY OF APPLETON  
 OUTAGAMIE COUNTY, WI**



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**FIGURE 3**





LEGEND	
---	EXISTING PROPERTY LINE
TW-1	SOIL BORING/SMALL DIAMETER MONITORING WELL
TW-1	ABANDONED SOIL PROBE/SMALL DIAMETER MONITORING WELL
B-2	SOIL BORING
GP-1	GEOPROBE
+	PROPOSED MONITORING WELL LOCATION

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**PROPOSED MONITORING WELL LOCATIONS**  
**FORMER NEIGHBORHOOD CLEANERS**  
**621 W. NORTHLAND AVENUE**  
 CITY OF APPLETON  
 OUTAGAMIE COUNTY, WI

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**FIGURE 4**

**APPENDIX B**  
**TABLES**

**TABLE 2**  
**SUMMARY OF GROUNDWATER ANALYTICAL RESULTS**  
**PROPOSED ALDI'S- 2702 NORTH RICHMOND STREET, APPLETON, WISCONSIN**  
**GEC PROJECT #2-0120-82**

Monitoring Well	NR 140		B-2	TW-1	TW-2	TW-3	TW-4
	ES	PAL	10/30/2019	10/31/2019	11/5/2019	10/31/2019	10/30/2019
<b>VOLATILE ORGANIC COMPOUNDS (VOC) (µg/L)</b>							
Benzene	5	0.5	<0.22	<0.22	<0.22	<0.22	<0.22
1,1 Dichloroethane	850	85	<0.36	<0.36	<0.36	<0.36	0.7J
cis 1,2 Dichloroethene	70	7	<0.37	<0.37	<0.37	<0.37	<0.37
trans 1,2 Dichloroethene	100	20	<0.34	<0.34	<0.34	<0.34	<0.34
Ethylbenzene	700	140	<0.26	<0.26	<0.26	<0.26	<0.26
p-Isopropyltoluene	NE	NE	<0.24	<0.24	<0.24	<0.24	<0.24
Methyl tert-butyl ether	60	12	<0.28	<0.28	<0.28	<0.28	<0.28
Tetrachloroethene	5	0.5	<0.38	<i>0.69J</i>	<0.38	<0.38	<i>0.87J</i>
Toluene	800	160	<0.19	<0.19	<0.19	<0.19	0.31J
Trichloroethene	5	0.5	<0.3	<0.3	<0.3	<0.3	<0.3
1,2,4-Trimethylbenzene	480	96	<0.8	<0.8	<0.8	<0.8	<0.8
1,3,5-Trimethylbenzene			<0.63	<0.63	<0.63	<0.63	<0.63
Vinyl Chloride	0.2	0.02	<0.2	<0.2	<0.2	<0.2	<0.2
Xylenes, o	2000	400	<0.43	<0.43	<0.43	<0.43	<0.43
Xylenes, -m, -p			<0.29	<0.29	<0.29	<0.29	<0.29

NE = NR 140 ES not established

J = Analyte detected above laboratory limit of detection but below limit of quantitation.

Italics indicated analytical results above NR 140 PAL

Bold indicates analytical results above NR 140 ES



**TABLE 2**  
**SUMMARY OF GROUNDWATER ANALYTICAL RESULTS**  
**PROPOSED ALDI'S- 2702 NORTH RICHMOND STREET, APPLETON, WISCONSIN**  
**GEC PROJECT #2-0120-82**

Monitoring Well	NR 140		TW-5	TW-6	TW-7	TW-8	TW-9	TW-10
	ES	PAL	1/17/2020	1/17/2020	1/17/2020	1/17/2020	1/17/2020	1/17/2020
<b>VOLATILE ORGANIC COMPOUNDS (VOC) (<math>\mu\text{g/L}</math>)</b>								
Benzene	5	0.5	<0.22	<0.22	<0.22	<0.22	<0.22	<0.22
1,1 Dichloroethane	850	85	<0.36	1.22	1.67	<0.36	<0.36	<0.36
cis 1,2 Dichloroethene	70	7	<0.37	<0.37	<0.37	<0.37	0.48J	1.54
trans 1,2 Dichloroethene	100	20	<0.34	<0.34	<0.34	<0.34	0.83J	<0.34
Ethylbenzene	700	140	<0.26	<0.26	<0.26	<0.26	<0.26	<0.26
p-Isopropyltoluene	NE	NE	<0.24	<0.24	<0.24	<0.24	0.63J	0.74J
Methyl tert-butyl ether	60	12	<0.28	<0.28	<0.28	<0.28	<0.28	<0.28
Tetrachloroethene	5	0.5	<0.38	<0.38	<0.38	<b>76</b>	<b>166</b>	<b>22.5</b>
Toluene	800	160	0.38J	<0.19	<0.19	<0.19	0.22J	<0.19
Trichloroethene	5	0.5	<0.3	<0.3	<0.3	1.32	1.68	0.67J
1,2,4-Trimethylbenzene	480	96	<0.8	<0.8	<0.8	<0.8	<0.8	<0.8
1,3,5-Trimethylbenzene			<0.63	<0.63	<0.63	<0.63	<0.63	<0.63
Vinyl Chloride	0.2	0.02	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2
Xylenes, o	2000	400	<0.43	<0.43	<0.43	<0.43	<0.43	<0.43
Xylenes, -m, -p			<0.29	<0.29	<0.29	<0.29	<0.29	<0.29

NE = NR 140 ES not established

J = Analyte detected above laboratory limit of detection but below limit of quantitation.

Italics indicated analytical results above NR 140 PAL

Bold indicates analytical results above NR 140 ES

**TABLE 1  
SUMMARY OF SOIL ANALYTICAL RESULTS  
PROPOSED ALDI'S- 2702 NORTH RICHMOND STREET, APPLETON, WISCONSIN  
GEC PROJECT #2-0120-82**

Sample No. Sampling Date	NR 720 CANCER RCL	WDNR Non- Industrial RCL (Direct Contact)	WDNR Soil to Groundwater RCL	B-1	B-12	B-13	B-14	B-15	B-16	B-18	
				10/29/2019	10/29/2019	10/29/2019	10/29/2019	10/29/2019	10/29/2019	10/29/2019	
Sample Depth (feet)				4.5-6	3-5	8-10	3-5	8-10	8-10	3-5	8-10
<b>VOLATILE ORGANIC COMPOUNDS (VOCs) (µg/kg)</b>											
Benzene	1490	1490	5.1	<30	<30	<30	<30	<30	<30	<30	<30
cis 1,2 Dichloroethene	156000	156000	41.2	<32	<32	<32	<32	<32	<32	<32	<32
Ethylbenzene	7470	7470	1570	<35	<35	<35	<35	<35	<35	<35	<35
Methyl tert-butyl ether	59400	59400	27	<50	<50	<50	<50	<50	<50	<50	<50
Tetrachloroethene	30700	30700	4.5	<b>151</b>	<32	<32	<32	<32	<32	<32	<32
Toluene	5300000	818000	1107	<32	<32	<32	<32	<32	<32	<32	<32
Trichloroethene	1260	1260	3.6	<41	<41	<41	<41	<41	<41	<41	<41
1,2,4-Trimethylbenzene	89800	89800	1382	<25	<25	<25	<25	<25	<25	<25	<25
1,3,5-Trimethylbenzene	782000	182000	1382	<32	<32	<32	<32	<32	<32	<32	<32
Vinyl Chloride	89,200	67	67	<19	<19	<19	<19	<19	<19	<19	<19
Xylenes, -m, -p	890000	258000	3940	<116	<116	<116	<116	<116	<116	<116	<116
Xylenes, -o				<116	<116	<116	<116	<116	<116	<116	<116

J = Analyte detected above laboratory limit of detection but below limit of quantitation.  
 Bold indicates analytical results exceed NR 720 RCL or generic RCL for direct contact or groundwater pathway  
 RCL = Residual Contaminant Level  
 SSL = Soil Screening Levels  
 DCL = Direct-Contact Levels  
 NA = Parameter not analyzed  
 NE = NR 720 RCL not established

**TABLE 1  
SUMMARY OF SOIL ANALYTICAL RESULTS  
PROPOSED ALDI'S- 2702 NORTH RICHMOND STREET, APPLETON, WISCONSIN  
GEC PROJECT #2-0120-82**

Sample No. Sampling Date	NR 720 CANCER RCL	WDNR Non- Industrial RCL (Direct Contact)	WDNR Soil to Groundwater RCL	GP-19	GP-20		GP-21		GP-22	
				1/13/2020	1/13/2020		1/13/2020		1/13/2020	
Sample Depth (feet)				3-5	3-5	8-10	3-5	5-7	3-5	7-9
<b>VOLATILE ORGANIC COMPOUNDS (VOCs) (µg/kg)</b>										
Benzene	1490	1490	5.1	<30	<30	<30	<30	<30	<30	<30
cis 1,2 Dichloroethene	156000	156000	41.2	<32	<32	<32	<32	<32	<32	<32
Ethylbenzene	7470	7470	1570	<35	<35	<35	<35	<35	<35	<35
Methyl tert-butyl ether	59400	59400	27	<50	<50	<50	<50	<50	<50	<50
Tetrachloroethene	30700	30700	4.5	<32	<32	<32	<32	<32	<32	<32
Toluene	5300000	818000	1107	<32	<32	<32	<32	<32	<32	<32
Trichloroethene	1260	1260	3.6	<41	<41	<41	<41	<41	<41	<41
1,2,4-Trimethylbenzene	89800	89800	1382	<25	<25	<25	<25	<25	<25	<25
1,3,5-Trimethylbenzene	782000	182000	1382	<32	<32	<32	<32	<32	<32	<32
Vinyl Chloride	89,200	67	67	<19	<19	<19	<19	<19	<19	<19
Xylenes, -m, -p	890000	258000	3940	<116	<116	<116	<116	<116	<116	<116
Xylenes, -o				<116	<116	<116	<116	<116	<116	<116

J = Analyte detected above laboratory limit of detection but below limit of quantitation.

Bold indicates analytical results exceed NR 720 RCL or generic RCL for direct contact or groundwater pathway

RCL = Residual Contaminant Level

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**TABLE 1  
SUMMARY OF SOIL ANALYTICAL RESULTS  
PROPOSED ALDI'S- 2702 NORTH RICHMOND STREET, APPLETON, WISCONSIN  
GEC PROJECT #2-0120-82**

Sample No. Sampling Date	NR 720 CANCER RCL	WDNR Non- Industrial RCL (Direct Contact)	WDNR Soil to Groundwater RCL	GP-23		GP-24		GP-25		GP-26		GP-27	
				1/13/2020		1/13/2020		1/13/2020		1/13/2020		1/13/2020	
Sample Depth (feet)				2-4	5-7	3-4	6-7	2-3	6-7	2-3	6-7	1-2	6-7
<b>VOLATILE ORGANIC COMPOUNDS (VOCs) (µg/kg)</b>													
Benzene	1490	1490	5.1	<30	<30	<30	<30	<30	<30	<30	<30	<30	<30
cis 1,2 Dichloroethene	156000	156000	41.2	<32	<32	<32	<32	<32	<32	<32	<32	<32	<32
trans-1,2 Dichloroethene	NE	1,560,000	62.6	<28	<28	33J	<28	<28	<28	<28	<28	<28	<28
Ethylbenzene	7470	7470	1570	<35	<35	<35	<35	<35	<35	<35	<35	<35	<35
Methyl tert-butyl ether	59400	59400	27	<50	<50	<50	<50	<50	<50	<50	<50	<50	<50
Tetrachloroethene	30700	30700	4.5	<32	<32	<32	135	79J	<32	<32	64J	<32	<32
Toluene	5300000	818000	1107	<32	<32	<32	<32	<32	<32	<32	<32	<32	<32
Trichloroethene	1260	1260	3.6	<41	<41	42J	<41	98J	<41	<41	<41	<41	<41
1,2,4-Trimethylbenzene	89800	89800	1382	<25	<25	<25	<25	<25	<25	<25	<25	<25	<25
1,3,5-Trimethylbenzene	782000	182000	1382	<32	<32	<32	<32	<32	<32	<32	<32	<32	<32
Vinyl Chloride	89,200	67	67	<19	<19	<19	<19	<19	<19	<19	<19	<19	<19
Xylenes, -m, -p	890000	258000	3940	<116	<116	<116	<116	<116	<116	<116	<116	<116	<116
Xylenes, -o													

J = Analyte detected above laboratory limit of detection but below limit of quantitation.  
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