

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

## Definitions

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

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

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

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

## Select the Correct Form

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

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

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

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

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

## Instructions

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

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

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

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## Section 1. Contact and Recipient Information

### Requester Information

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

|                             |                           |                                |                             |
|-----------------------------|---------------------------|--------------------------------|-----------------------------|
| Last Name                   | First                     | MI                             | Organization/ Business Name |
| Schiesl                     | Andy                      |                                | Gardner Denver              |
| Mailing Address             |                           |                                | City                        |
| 222 East Erie Street        |                           |                                | Fort Atkinson               |
|                             |                           |                                | State                       |
|                             |                           |                                | WI                          |
|                             |                           |                                | ZIP Code                    |
|                             |                           |                                | 53538                       |
| Phone # (include area code) | Fax # (include area code) | Email                          |                             |
| (414) 212-4700              |                           | andy.schiesl@gardnerdenver.com |                             |

The requester listed above: (select all that apply)

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

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

Select if same as requester

|                             |                           |                     |                                       |
|-----------------------------|---------------------------|---------------------|---------------------------------------|
| Contact Last Name           | First                     | MI                  | Organization/ Business Name           |
| Frieseke                    | Rick                      | W                   | Friess Environmental Consulting, Inc. |
| Mailing Address             |                           |                     | City                                  |
| 6635 N. Sidney Place        |                           |                     | Milwaukee                             |
|                             |                           |                     | State                                 |
|                             |                           |                     | WI                                    |
|                             |                           |                     | ZIP Code                              |
|                             |                           |                     | 53209                                 |
| Phone # (include area code) | Fax # (include area code) | Email               |                                       |
| (414) 228-9815              | (414) 228-9816            | rfrieseke@fecinc.us |                                       |

### Environmental Consultant (if applicable)

|                             |                           |                |                                       |
|-----------------------------|---------------------------|----------------|---------------------------------------|
| Contact Last Name           | First                     | MI             | Organization/ Business Name           |
| Ott                         | Trenton                   | J              | Friess Environmental Consulting, Inc. |
| Mailing Address             |                           |                | City                                  |
| 6637 N. Sidney Place        |                           |                | Milwaukee                             |
|                             |                           |                | State                                 |
|                             |                           |                | WI                                    |
|                             |                           |                | ZIP Code                              |
|                             |                           |                | 53209                                 |
| Phone # (include area code) | Fax # (include area code) | Email          |                                       |
| (414) 228-9815              | (414) 228-9816            | tott@fecinc.us |                                       |

### Attorney (if applicable)

|                                     |                           |                              |                                 |
|-------------------------------------|---------------------------|------------------------------|---------------------------------|
| Contact Last Name                   | First                     | MI                           | Organization/ Business Name     |
| Van Lieshout                        | John                      | M                            | Reinhart Boerner Van Deuren s.c |
| Mailing Address                     |                           |                              | City                            |
| 1000 North Water Street, Suite 1700 |                           |                              | Milwaukee                       |
|                                     |                           |                              | State                           |
|                                     |                           |                              | WI                              |
|                                     |                           |                              | ZIP Code                        |
|                                     |                           |                              | 53202                           |
| Phone # (include area code)         | Fax # (include area code) | Email                        |                                 |
| (414) 298-8182                      | (414) 298-8097            | jvanlieshout@reinhartlaw.com |                                 |

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

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## Section 2. Property Information

|   |  |   |                                  |
|---|--|---|----------------------------------|
| Property Name<br><b>DB Oak Facility</b>     |  | FID No. (if known)<br><b>128003260</b>  |                                  |
| BRRTS No. (if known)<br><b>02-28-176509</b> | Parcel Identification Number<br><b>226-0614-3433-039</b>   |   |                                  |
| Street Address<br><b>700-710 Oak Street</b> | City<br><b>Fort Atkinson</b>   | State<br><b>WI</b>  | ZIP Code<br><b>53538</b>         |
| County<br><b>Jefferson</b>                  | Municipality where the Property is located<br><input checked="" type="radio"/> City <input type="radio"/> Town <input type="radio"/> Village of <b>Fort Atkinson</b> | Property is composed of:<br><input checked="" type="radio"/> Single tax parcel <input type="radio"/> Multiple tax parcels | Property Size Acres<br><b>20</b> |

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

No  Yes

Date requested by: \_\_\_\_\_

Reason: \_\_\_\_\_

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

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

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

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

**Section 3. Technical Assistance or Post-Closure Modifications;**

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

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

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

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

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

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

Post-Closure Modifications - NR 727, [181]

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

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

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**Skip Sections 4 and 5 if the technical assistance you are requesting is listed above and complete Sections 6 and 7 of this form.**

## Section 4. Request for Liability Clarification

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

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

❖ **Include a fee of \$700.**

Provide the following documentation:

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

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

❖ **Include a fee of \$700.**

Provide the following documentation:

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

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

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

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

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

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

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**Section 4. Request for Liability Clarification (cont.)**

Lease liability clarification - s. 292.55, Wis. Stats. [646]

❖ **Include a fee of \$700 for a single Property, or \$1400 for multiple Properties and the information listed below:**

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

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

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

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

❖ **Include a fee of \$700.**

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

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

❖ **Include a fee of \$700.**

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

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

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

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## Section 5. Request for a Specialized Agreement

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

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

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

- (1) Phase I and II Environmental Site Assessment Reports,
- (2) a copy of the Property deed with the correct legal description; and,
- (3) a draft 75.105 agreement based on the DNR's model ([dnr.wi.gov/topic/brownfields/documents/mod75-105agrmt.pdf](http://dnr.wi.gov/topic/brownfields/documents/mod75-105agrmt.pdf)).

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

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

- (1) Phase I and II Environmental Site Assessment Reports,
- (2) a copy of the Property deed with the correct legal description; and,
- (3) a draft 75.105 agreement based on the DNR's model ([dnr.wi.gov/topic/brownfields/documents/mod75-106agrmt.pdf](http://dnr.wi.gov/topic/brownfields/documents/mod75-106agrmt.pdf)).

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

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

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

## Section 6. Other Information Submitted

Identify all materials that are included with this request.

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

Phase I Environmental Site Assessment Report - Date: \_\_\_\_\_

Phase II Environmental Site Assessment Report - Date: \_\_\_\_\_

Legal Description of Property (required for all liability requests and specialized agreements)

Map of the Property (required for all liability requests and specialized agreements)

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

Groundwater     Soil     Sediment     Other medium - Describe: \_\_\_\_\_

Date of Collection: \_\_\_\_\_

A copy of the closure letter and submittal materials

Draft tax cancellation agreement

Draft agreement for assignment of tax foreclosure judgment

Other report(s) or information - Describe: Hazardous Waste Determination dated 3/26/20

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

Yes - Date (if known): 05/02/1995

No

Note: The Notification for Hazardous Substance Discharge (non-emergency) form is available at:  
[dnr.wi.gov/files/PDF/forms/4400/4400-225.pdf](http://dnr.wi.gov/files/PDF/forms/4400/4400-225.pdf).

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

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**Section 7. Certification by the Person who completed this form**

I am the person submitting this request (requester)

I prepared this request for: DB Oak LTD Partnership

Requester Name

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

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date Signed

\_\_\_\_\_  
Title

\_\_\_\_\_  
Telephone Number (include area code)

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

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## Section 8. DNR Contacts and Addresses for Request Submittals

Send or deliver one paper copy and one electronic copy on a compact disk of the completed request, supporting materials, and fee to the region where the property is located to the address below. Contact a [DNR regional brownfields specialist](#) with any questions about this form or a specific situation involving a contaminated property. For electronic document submittal requirements see: <http://dnr.wi.gov/files/PDF/pubs/rr/RR690.pdf>.

### DNR NORTHERN REGION

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

### DNR NORTHEAST REGION

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

### DNR SOUTH CENTRAL REGION

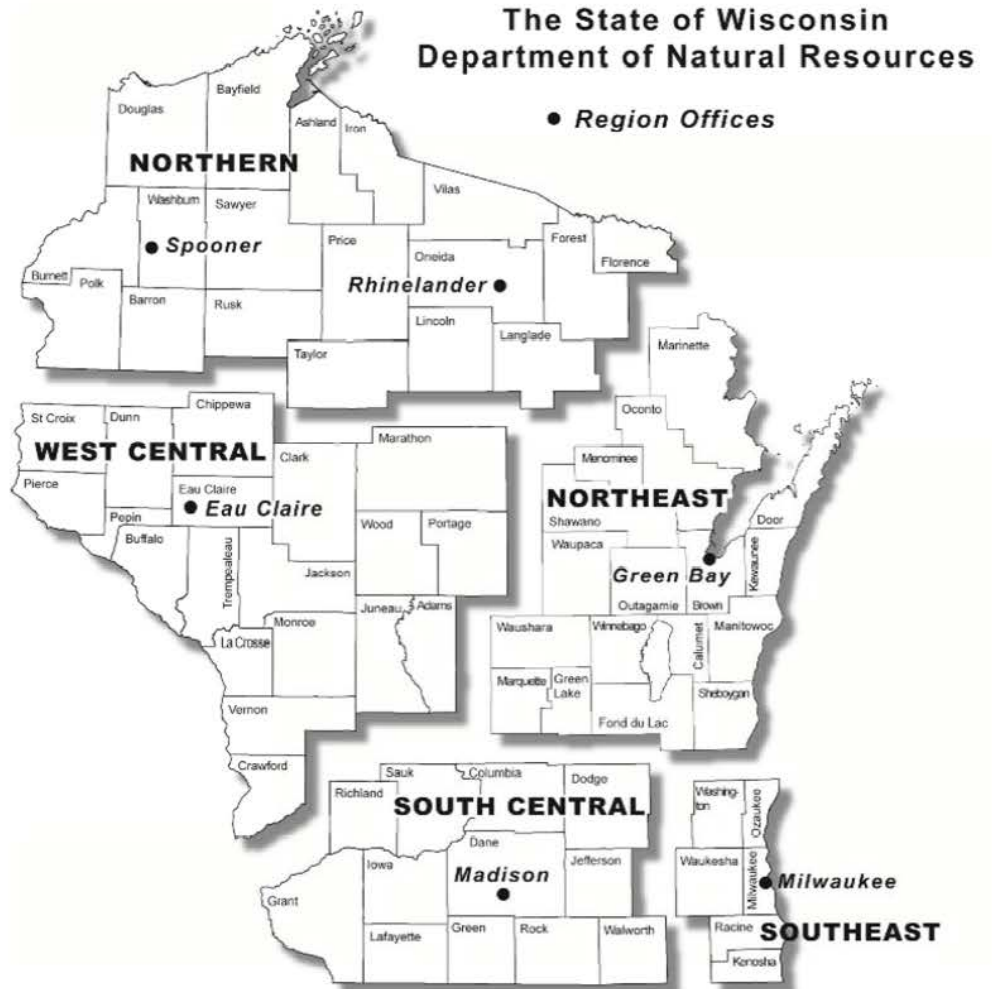
Attn: RR Program Assistant  
Department of Natural Resources  
3911 Fish Hatchery Road  
Fitchburg WI 53711

### DNR SOUTHEAST REGION

Attn: RR Program Assistant  
Department of Natural Resources  
2300 North Martin Luther King Drive  
Milwaukee WI 53212

### DNR WEST CENTRAL REGION

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



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

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



March 26, 2020

Mr. Jeff Ackerman  
Wisconsin Department of Natural Resources  
3911 Fish Hatchery Road  
Fitchburg, WI 53711

RE: Hazardous Waste Determination for the DB Oak Property (former Thomas Industries) Located at 700-710 Oak Street in Fort Atkinson, Wisconsin — FEC Project No. 170503, DNR BRRTS No. 02-28-176509

Dear Mr. Ackerman:

On behalf of Gardner Denver, **Friess Environmental Consulting (FEC)** has prepared this Hazardous Waste Determination Request for soil excavated as part of the vapor mitigation system (VMS) being installed at the site. As we discussed, initial pressure field extension (PFE) testing was conducted in October 2019. Based on the results, it was determined the best way to mitigate sub-slab vapors would be to bury perforated vent pipe in long horizontal trenches with large custom built blowers that could handle the possibility of extremely high volumes and/or create the extremely high negative pressures that are required for the tighter sub-slab soil areas.

In order to install the system, it will be necessary to excavate soils within the trenches and dispose of the materials in accordance with applicable regulations. FEC has completed this Request for Hazardous Waste Determination letter for the subject property and requests WDNR review and approval of the conclusions presented herein.

### Project Background

The DB Oak property is located at 700-710 Oak Street in Fort Atkinson, Wisconsin. The property is bounded by East Cramer Street to the north, Oak Street to the west-southwest, and the Union Pacific (formerly Chicago and Northwest) rail line to the east-southeast. The property consists of an 180,000-square foot building with surrounding driveways and parking lots. The site location and property features are shown on Figures 1 and 2.

The DB Oak facility is currently used as a warehouse but was historically used for manufacturing residential lighting fixtures by Moe Brothers Manufacturing beginning in 1939. Moe Brothers Manufacturing changed its name to Moe Lighting and was acquired by Thomas Industries (Thomas) in 1948. Lighting fixtures continued to be manufactured at the facility until the early 1980's. Thomas sold the facility in 1985 to The Wand Corporation (Wand) who subsequently utilized the facility to manufacture storm doors and windows beginning in 1985, but vacated the building by 1992 reportedly after filing for bankruptcy. The building is currently leased for warehouse space by Storage Space Solutions. Office and garage areas at the south end of the building are

currently leased by Riedl & Son Exterior Specialist. The Fort Atkinson Kennel Club also leases space at the west side of the building.

In an August 28, 1985, letter to Wand, RMT, Inc. identified a 10,000-gallon above ground storage tank (AST) that was used to store PCE, and an 18,000-gallon underground storage tank (UST) that held No. 2 fuel oil. The Wisconsin Department of Natural Resources (WDNR) subsequently performed a generator inspection on March 27, 1986, when the facility was occupied by Wand. This inspection was completed by Wendell Wojner of the WDNR and described in an April 1986 memo; no hazardous waste was observed during the inspection. The inspection report indicated that the site had been decontaminated prior to remodeling the building. Decontamination included the removal of all hazardous materials stored on site, and the decontamination and removal of wastewater treatment tanks and degreasers. An electroplating line had been dismantled, and a new concrete floor installed. A foundation for a large AST remained on site at the rear of the building, but the tank had been removed.

During a March 16, 1994, Phase I Environmental Site Assessment (ESA), Gabriel Midwest found no evidence of the fuel oil UST. It also observed that the AST that held PCE was absent but confirmed that the concrete AST cradle remained on-site. In March 1995 ATEC Associates Inc. (ATEC) completed a Phase II ESA at the facility to identify potential releases from the former fuel oil UST, PCE AST, and a former 500-gallon gasoline UST, not identified in previous reports. Trace levels of petroleum constituents (ethylbenzene, toluene, and xylenes) along with low concentrations of metals (arsenic, barium, chromium, and lead) were detected in soil and groundwater at various locations on the facility property. PCE and associated degradation products were also detected in soil and groundwater samples collected along the east and south sides of the facility building. These compounds were detected at concentrations several orders of magnitude above regulatory standards.

Based on a review of information available on the DNR BRRTS database, extensive site investigation activities have been conducted for a release of chlorinated volatile organic compounds (CVOCs) from the above referenced site. In addition, remedial activities, including soil vapor extraction and in-situ biological reductive de-chlorination and groundwater monitoring, have been conducted since 2004. In addition, a previously submitted "Contained out Hazardous Waste Determination Request" dated March 13, 2017, for the site was subsequently approved by the WDNR in their letter dated June 26, 2017.

#### Contained Out Evaluation

As shown in the attached table CVOCs were detected at concentrations below WDNR's health based "Contained-Out" values (direct contact RCLs). These results also indicate that the soil is not hazardous by characteristic per Wisconsin Administrative Code sections NR 620.21 through 620.24. Because chlorinated VOCs (i.e. PCE and TCE) can be considered listed hazardous waste, additional evaluation is needed before a 'contained out' waste determination can be made.

The contained-out evaluation follows.

With respect to hazardous waste determination WDNR guidance (RR 705), policy states the following:

*Both State and Federal rules require the generator of a solid waste to determine whether that waste is a hazardous waste. This requirement (see s. 291.21, Stats.) applies to contaminated media and other waste generated during remediation activities, as well as process wastes. There are 2 major ways that contaminated environmental media can become a hazardous waste. The first is if the media contains a listed hazardous waste, and the second is if the media exhibits a hazardous characteristic. In either case it is the waste generator's responsibility to determine if the media is by definition a hazardous waste. This can be accomplished by either testing the material using the methods set out in ch. NR 661, or by "applying knowledge". Unfortunately, no specific guidance exists on the criteria to use when applying knowledge, especially for contaminated media and therefore these decisions need to be made on a case-by-case basis. However, EPA has issued general guidance on how to make case-by-case determinations and these are summarized below.*

With respect to listed wastes, WDNR guidance, policy states the following:

*Chapter NR 661 Subchapter D includes a series of tables that identify certain waste streams that are, by definition, hazardous wastes. For example, spent cyanide plating bath solutions from electroplating operations are defined as an F007 listed hazardous waste and spent halogenated solvents used for degreasing are defined as F001 listed wastes. These "F" listed wastes are hazardous wastes from non-specific sources. There are also "K" listed wastes that are hazardous wastes from specific sources. An example is K106 that is wastewater treatment sludge from the mercury cell process in chlorine production.*

*The rules also contain a list of commercial chemical products and manufacturing chemical intermediates such as benzene or trichloroethene (TCE) that would be considered listed hazardous waste if a person discards or intends to discard these products or intermediates. These would be considered either "U" listed or "P" listed wastes depending on the compound. Further, wastes or media derived from the treatment of a listed hazardous waste would be considered listed hazardous waste. As an example, activated carbon being used to treat groundwater contaminated with a listed hazardous waste would be considered listed hazardous waste under the "derived from" rule. Finally, solid wastes or environmental media that are mixed with listed hazardous waste are also considered hazardous waste under the "mixture rule".*

*As discussed earlier, the “contained-in” policy states that contaminated environmental media is not itself a hazardous waste but requires management as a hazardous waste if it contains a listed waste or exhibits a hazardous characteristic. In remedial situations, it is often difficult to determine the source of contamination. EPA guidance indicates: “Where a facility owner/operator makes a good faith effort to determine if the material is a listed hazardous waste but cannot make such a determination because documentation regarding the source of contamination, contaminant or waste is unavailable or inconclusive, one may assume the source, contaminant or waste is not a listed hazardous waste”. The EPA guidance goes on to say: “Therefore, provided the material in question does not exhibit a characteristic of hazardous waste, RCRA requirements do not apply”.*

Gardner Denver believes contaminated soil should not be classified as a hazardous waste. Soil analytical results indicate that all contaminant concentrations are below the appropriate regulatory levels and therefore the excavated material can be managed as a solid waste. The following good faith effort supports this conclusion.

#### Hazardous Waste Determination

The goal of the hazardous waste determination process is to determine if the contaminated media (soil and groundwater) is associated with the release of a listed hazardous waste. The contaminants of concern for the Hazardous Waste Determination are those compounds associated with the former process activities that could have been released as “source” compounds and those compounds that might be considered “daughter” compounds. The contaminants of concern associated with the site include:

- Select CVOC constituents: tetrachloroethene (PCE), trichloroethene (TCE), cis-1,2- dichloroethene, trans-1,2-dichloroethene, and vinyl chloride.

Determining the hazardous status of the compounds is typically a tiered process based on how the compounds were released, the ability to document the release, the dates of the release, the regulations in place at the time of the release, and the planned remedy for the material.

- 1) *The first step a responsible party or waste generator needs to take is to determine if the media was contaminated by material meeting the definition of a listed hazardous waste or commercial chemical product. As previously discussed, this requires a good faith effort to determine the source of the contamination. If information on the source of the contamination is unavailable or inconclusive, the responsible party or waste generator may assume that the media is not contaminated by a listed hazardous waste*

There is no information regarding a source of contamination for CVOCs detected in soil or groundwater samples at the DB Oak property. Soil and groundwater

samples collected during previous investigations identified source areas at the east side of the facility building years after manufacturing operations by Thomas Industries ceased. There is no information demonstrating whether releases of chlorinated solvents occurred before or after dates of regulation of those materials. Further, there is no information demonstrating whether the chlorinated impacts in the soils are from spent solvents or from virgin product. Therefore, there is no clear suspected source of the identified CVOC impacts at the subject property. There are no known records regarding generation or disposal of CVOCs waste related to historic manufacturing at the site that meet the definition of a listed hazardous waste. In its June 26, 2017 letter, the DNR stated "The available knowledge on the site history and waste source also qualify the material to be contained out".

- 2) *If the answer under Step 1 is no, (the media is not contaminated by a listed hazardous waste) then the responsible party or waste generator must make the same good faith effort to determine if the source of the contamination was from the release of a characteristic waste after the waste was defined as hazardous. If the material was a characteristic hazardous waste at the time it was released, e.g., the answer to this step is yes, go to Step 1c.*

There are no known records regarding generation or disposal of chlorinated VOCs wastes related to historic manufacturing at the site that meet the definition of characteristic hazardous waste.

- 3) *If the answer under Step 2. is no, (the source of contamination was not a characteristic hazardous waste) the next step is to determine whether the media will be managed in-situ or ex-situ.*

Soil will be managed ex-situ.

*If management of the media will take place ex-situ (for example, excavation and off-site disposal) then the generator would need to determine if the media exhibits a hazardous characteristic through testing or applying knowledge.*

For a mixture of a waste/product and the environmental media that it is contained in (soil or groundwater) to be considered a Characteristic Hazardous Waste, it must exhibit a characteristic of a hazardous waste (i.e. ignitability, reactivity, corrosivity, toxicity) and it must be managed ex-situ. In this case we do not expect the contaminated soil or groundwater to exhibit ignitable, reactive, or corrosive characteristics. This makes toxicity the applicable characteristic to be evaluated.

The toxicity of the contaminated soil is evaluated by comparing the soil analytical data with the TCLP standards. A soil is considered characteristically non-hazardous if: The results of the TCLP analysis are below the TCLP regulatory limits, or the in-situ contaminant concentrations are below their associated TCLP Totals Analysis Limits (defined as 20 times the TCLP Limits).

Soil analytical testing of the samples of soils generated from the VMS trench excavation indicate no VOCs were reported at concentrations greater than 20 times their corresponding TCLP limits. The results of the VOC soil analytical data indicate that the soil from the trenches at the Site would not be considered characteristically hazardous. Copies of the laboratory analytical reports are included. Further as previously concluded by the DNR, the available knowledge of the site history and waste source also qualify the material to be 'contained out'.

#### Conclusion

Gardner Denver believes the soil should not be classified as a hazardous waste. At this time we are requesting that the WDNR review and approve this Hazardous Waste Determination that the soil and groundwater contaminated with CVOCs at the Site, at locations where the contaminated media do not exceed TCLP limits, are not considered a listed hazardous waste and can be disposed of as a solid waste through the contained-out determination.

A completed Remediation Site Hazardous Waste Determination form (WDNR Form 4430-019) is included along with Technical Assistance Request (WDNR Form 4400-237) and required review fee.

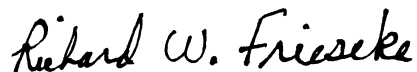
We appreciate this opportunity to submit this letter. Please call us at (414) 228-9815 if you have any questions or if you need additional information.

Respectfully,

**FRIESS ENVIRONMENTAL CONSULTING, INC.**

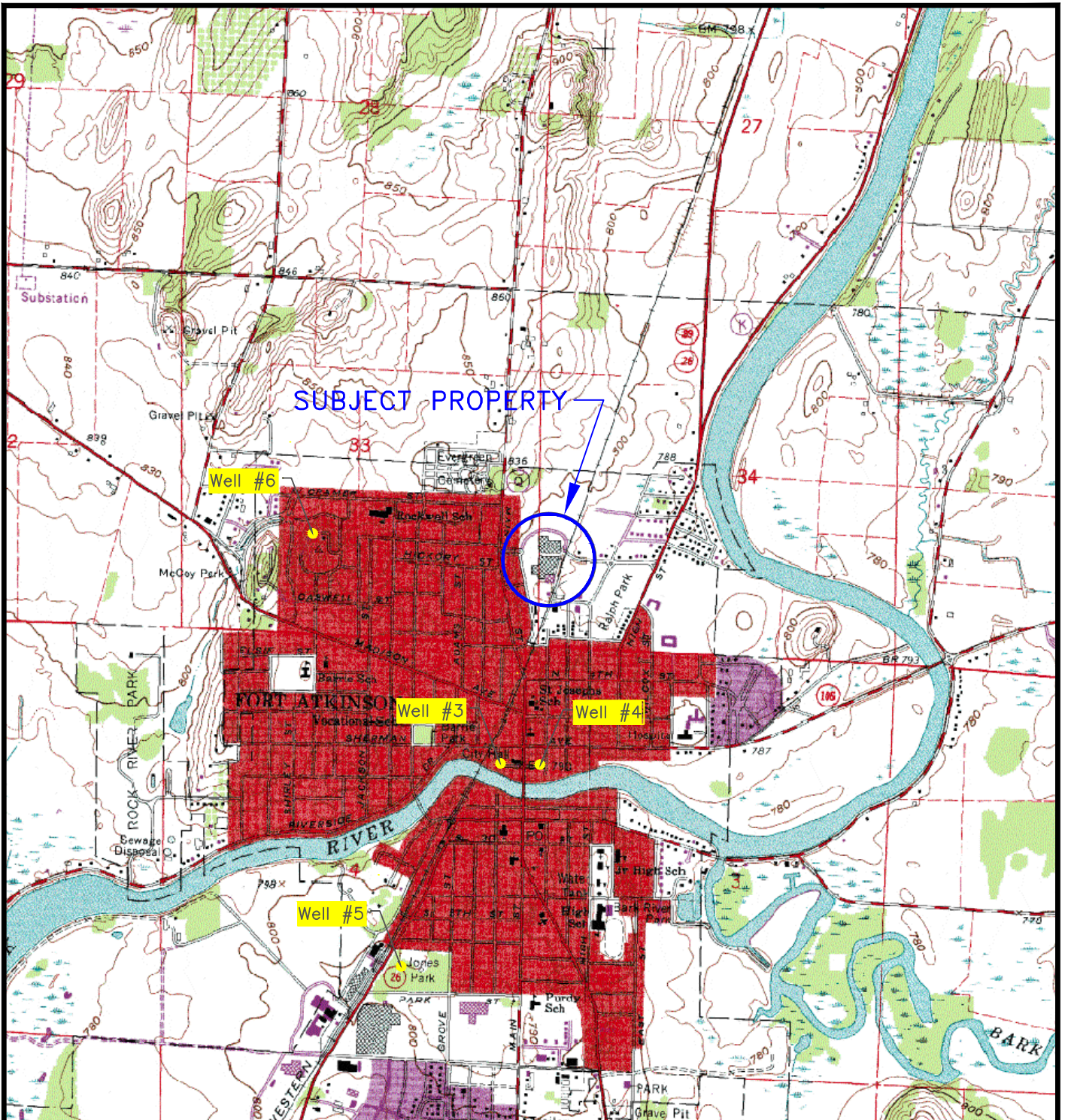


Trenton J. Ott  
Project Manager

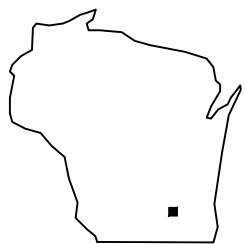


Richard W. Frieeseke, P.E.  
President

170503determination



BASE MAP SOURCE: USGS 7.5 MINUTE TOPOGRAPHIC QUADRANGLE, FORT ATKINSON, WISCONSIN, DATED 1987.



QUADRANGLE LOCATION

NORTH  
SCALE: 1"=2400'

Former Thomas Industries  
Fort Atkinson, Wisconsin

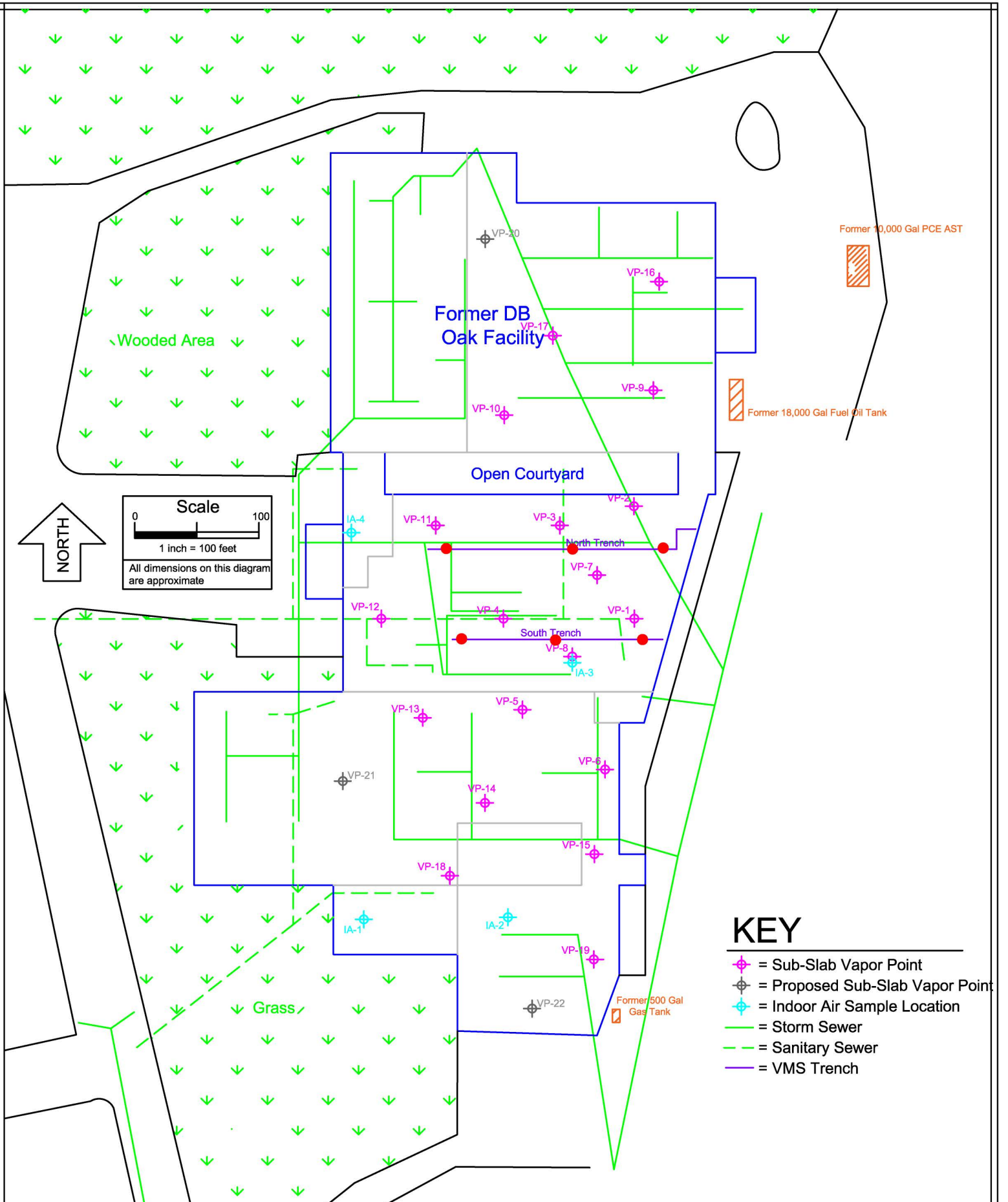
**SITE LOCATION**

March 2013

42-1-37320-001

**SHANNON & WILSON, INC.**  
Geotechnical and Environmental Consultants

**FIGURE 1**



**Scale**  
 0 100  
 1 inch = 100 feet  
 All dimensions on this diagram are approximate

- KEY**
- ◆ = Sub-Slab Vapor Point
  - ⊕ = Proposed Sub-Slab Vapor Point
  - ◆ = Indoor Air Sample Location
  - = Storm Sewer
  - - - = Sanitary Sewer
  - = VMS Trench

**FRIESS**  
 ENVIRONMENTAL  
 CONSULTING, INC.

File No.: 170503  
 DWG Date: 2-20-18  
 Rev Date: 8-26-19  
 Drawn By: BRF  
 Checked By (PM): TJO

**WP Site Diagram**  
 Former DB Oak Property  
 704 Oak Street  
 Fort Atkinson, Wisconsin



**A.2. Soil Analytical Results Table**  
**Trench Soil Analytical Results Table- VOCs**  
**Former DB Oak Property**  
**Fort Atkinson, Wisconsin**

| Sample Location                  | S/US | Sampling Date | Benzene (ppb) | cis-1,2-Dichloroethene (ppb) | Ethylbenzene (ppb) | Methyl tert-butyl ether (ppb) | Naphthalene (ppb) | Tetrachloroethene (ppb) | Toluene (ppb)  | 1,1,1-Trichloroethane (ppb) | Trichloroethene (ppb) | Combined Trimethylbenzenes (ppb) | Total Xylenes (ppb) |
|----------------------------------|------|---------------|---------------|------------------------------|--------------------|-------------------------------|-------------------|-------------------------|----------------|-----------------------------|-----------------------|----------------------------------|---------------------|
| <b>NORTH TRENCH</b>              |      |               |               |                              |                    |                               |                   |                         |                |                             |                       |                                  |                     |
| Truck Mid                        | US   | 2/25/2020     | <30.0         | <32.0                        | <35.0              | <50.0                         | <94.0             | <i>85.0 J</i>           | 268.00         | <30.0                       | <41.0                 | <57.0                            | <116.0              |
| East In Place                    | US   | 2/25/2020     | <30.0         | <32.0                        | <35.0              | <50.0                         | <94.0             | <i>1,890</i>            | 380.00         | <30.0                       | <41.0                 | <57.0                            | <116.0              |
| Mid In Place                     | US   | 2/25/2020     | <30.0         | <32.0                        | <35.0              | <50.0                         | <94.0             | <i>206</i>              | 109.00         | <30.0                       | <41.0                 | <57.0                            | <116.0              |
| West In Place                    | US   | 2/25/2020     | <30.0         | <32.0                        | <35.0              | <50.0                         | <94.0             | <32.0                   | 291.00         | <30.0                       | <41.0                 | <57.0                            | <116.0              |
| <b>SOUTH TRENCH</b>              |      |               |               |                              |                    |                               |                   |                         |                |                             |                       |                                  |                     |
| West Trench                      | US   | 2/18/2020     | <30.0         | <32.0                        | <35.0              | <50.0                         | <94.0             | <32.0                   | 235.00         | <30.0                       | <41.0                 | <57.0                            | <116.0              |
| Mid Trench                       | US   | 2/18/2020     | <30.0         | <32.0                        | <35.0              | <50.0                         | <94.0             | <i>212</i>              | 160.00         | <30.0                       | <41.0                 | <57.0                            | <116.0              |
| East Trench                      | US   | 2/18/2020     | <30.0         | <32.0                        | <35.0              | <50.0                         | <94.0             | <i>630</i>              | 222.00         | <30.0                       | <41.0                 | <57.0                            | <116.0              |
| <i>NR 720 Groundwater RCL</i>    |      |               | <i>5.1</i>    | <i>41.2</i>                  | <i>1,570</i>       | <i>27</i>                     | <i>658</i>        | <i>4.5</i>              | <i>1,107</i>   | <i>140</i>                  | <i>3.6</i>            | <i>1,379</i>                     | <i>3,960</i>        |
| <i>NR 720 Residential DC RCL</i> |      |               | <i>1,600</i>  | <i>156,000</i>               | <i>8,020</i>       | <i>63,800</i>                 | <i>5,520</i>      | <i>33,000</i>           | <i>818,000</i> | <i>640,000</i>              | <i>1,300</i>          | <i>219K/182K</i>                 | <i>260,000</i>      |
| <i>NR 720 Industrial DC RCL</i>  |      |               | <i>7,070</i>  | <i>2,340,000</i>             | <i>35,400</i>      | <i>282,000</i>                | <i>24,100</i>     | <i>145,000</i>          | <i>818,000</i> | <i>640,000</i>              | <i>8,410</i>          | <i>219K/182K</i>                 | <i>260,000</i>      |
| <i>20x TCLP limits</i>           |      |               | <i>10,000</i> | <i>NS</i>                    | <i>NS</i>          | <i>NS</i>                     | <i>NS</i>         | <i>14,000</i>           | <i>NS</i>      | <i>NS</i>                   | <i>10,000</i>         | <i>NS</i>                        | <i>NS</i>           |

Note: Concentrations that exceed their respective RCLs for the protection of groundwater are in *blue italics*.

Note: Concentrations that exceed their respective non-industrial RCLs for direct contact are underlined.

Note: Concentrations that exceed their respective industrial RCLs for direct contact are in [brackets].

Note: NR 720 values are taken from the RR Program's RCL spreadsheet (updated June 2018) as calculated utilizing the U.S. EPA's Regional Screening Level Web-Calculator per DNR draft document RR-890.

## Environmental Lab, Inc.

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

**Sample Handling Request**

Rush Analysis Date Required: \_\_\_\_\_  
 (Rushes accepted only with prior authorization)  
 Normal Turn Around

Lab I.D. # \_\_\_\_\_  
 QUOTE # : \_\_\_\_\_  
 Project #: 170503  
 Sampler: (signature) Matthew J. Ott

Project (Name / Location): DB Oak

|  |                         |
|--|-------------------------|
| Reports To: <u>Trenton Ott</u>             | Invoice To: <u>Same</u> |
| Company: <u>FEC, Inc</u>                   | Company: _____          |
| Address: <u>6635 N. Sidney Place</u>       | Address: _____          |
| City State Zip: <u>Milwaukee, WI 53209</u> | City State Zip: _____   |
| Phone: <u>(414) 228-9815</u>               | Phone: _____            |
| Email: <u>(414) 228-9816</u>               | Email: _____            |

**Analysis Requested** **Other Analysis**

| Lab I.D.         | Sample I.D.        | Collection     |           | Filtered Y/N | No. of Containers | Sample Type (Matrix)* | Preservation | DRO (Mod DRO Sep 95) | GRO (Mod GRO Sep 95) | LEAD | NITRATE/NITRITE | OIL & GREASE | PAH (EPA 8270) | PCB | PVOC (EPA 8021) | PVOC + NAPHTHALENE | SULFATE | TOTAL SUSPENDED SOLIDS | VOC DW (EPA 524.2) | VOC (EPA 8260) | VOC AIR (TO - 15) | 8-PCRA METALS | Dry weight | PID/FID |  |
|------------------|--------------------|----------------|-----------|--------------|-------------------|-----------------------|--------------|----------------------|----------------------|------|-----------------|--------------|----------------|-----|-----------------|--------------------|---------|------------------------|--------------------|----------------|-------------------|---------------|------------|---------|--|
|                  |                    | Date           | Time      |              |                   |                       |              |                      |                      |      |                 |              |                |     |                 |                    |         |                        |                    |                |                   |               |            |         |  |
| <u>5037513 A</u> | <u>West Trench</u> | <u>2/18/20</u> | <u>AM</u> | <u>N</u>     | <u>2</u>          | <u>Soil</u>           | <u>Melt</u>  |                      |                      |      |                 |              |                |     |                 |                    |         |                        |                    |                |                   |               |            |         |  |
| <u>B</u>         | <u>Mid Trench</u>  | ↓              | ↓         | ↓            | ↓                 | ↓                     | ↓            |                      |                      |      |                 |              |                |     |                 |                    |         |                        |                    |                |                   |               |            |         |  |
| <u>C</u>         | <u>East Trench</u> | ↓              | ↓         | ↓            | ↓                 | ↓                     | ↓            |                      |                      |      |                 |              |                |     |                 |                    |         |                        |                    |                |                   |               |            |         |  |

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

Sample Integrity - To be completed by receiving lab.  
 Method of Shipment: GC  
 Temp. of Temp. Blank: \_\_\_\_\_ °C On Ice:   
 Cooler seal intact upon receipt:  Yes  No

|  |                     |                        |                     |      |      |
|--|---------------------|------------------------|---------------------|------|------|
| Relinquished By: (sign)<br><u>Matthew J. Ott</u> | Time<br><u>1215</u> | Date<br><u>2/19/20</u> | Received By: (sign) | Time | Date |
| Received in Laboratory By: <u>[Signature]</u>    | Time: <u>8:00</u>   | Date: <u>2/20/20</u>   |                     |      |      |

# Synergy Environmental Lab, INC

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

TRENTON OTT  
FEC, INC.  
6635 N. SIDNEY PLACE  
MILWAUKEE, WI 53209

Report Date 03-Mar-20

Project Name DB OAK  
Project # 170503

Invoice # E37513

Lab Code 5037513A  
Sample ID WEST TRENCH  
Sample Matrix Soil  
Sample Date 2/18/2020

|                             | Result  | Unit  | LOD   | LOQ   | Dil | Method | Ext Date | Run Date  | Analyst | Code |
|-----------------------------|---------|-------|-------|-------|-----|--------|----------|-----------|---------|------|
| General                     |         |       |       |       |     |        |          |           |         |      |
| General                     |         |       |       |       |     |        |          |           |         |      |
| Solids Percent              | 96.6    | %     |       |       | 1   | 5021   |          | 2/20/2020 | NJC     | 1    |
| Organic                     |         |       |       |       |     |        |          |           |         |      |
| VOC's                       |         |       |       |       |     |        |          |           |         |      |
| Benzene                     | < 0.03  | mg/kg | 0.03  | 0.096 | 1   | 8260B  |          | 2/27/2020 | CJR     | 1    |
| Bromobenzene                | < 0.025 | mg/kg | 0.025 | 0.081 | 1   | 8260B  |          | 2/27/2020 | CJR     | 1    |
| Bromodichloromethane        | < 0.074 | mg/kg | 0.074 | 0.24  | 1   | 8260B  |          | 2/27/2020 | CJR     | 1    |
| Bromoform                   | < 0.029 | mg/kg | 0.029 | 0.092 | 1   | 8260B  |          | 2/27/2020 | CJR     | 1    |
| tert-Butylbenzene           | < 0.026 | mg/kg | 0.026 | 0.084 | 1   | 8260B  |          | 2/27/2020 | CJR     | 1    |
| sec-Butylbenzene            | < 0.033 | mg/kg | 0.033 | 0.1   | 1   | 8260B  |          | 2/27/2020 | CJR     | 1    |
| n-Butylbenzene              | < 0.04  | mg/kg | 0.04  | 0.13  | 1   | 8260B  |          | 2/27/2020 | CJR     | 1    |
| Carbon Tetrachloride        | < 0.016 | mg/kg | 0.016 | 0.053 | 1   | 8260B  |          | 2/27/2020 | CJR     | 1    |
| Chlorobenzene               | < 0.013 | mg/kg | 0.013 | 0.04  | 1   | 8260B  |          | 2/27/2020 | CJR     | 1    |
| Chloroethane                | < 0.091 | mg/kg | 0.091 | 0.29  | 1   | 8260B  |          | 2/27/2020 | CJR     | 1    |
| Chloroform                  | < 0.035 | mg/kg | 0.035 | 0.11  | 1   | 8260B  |          | 2/27/2020 | CJR     | 1    |
| Chloromethane               | < 0.076 | mg/kg | 0.076 | 0.24  | 1   | 8260B  |          | 2/27/2020 | CJR     | 1    |
| 2-Chlorotoluene             | < 0.015 | mg/kg | 0.015 | 0.047 | 1   | 8260B  |          | 2/27/2020 | CJR     | 1    |
| 4-Chlorotoluene             | < 0.018 | mg/kg | 0.018 | 0.057 | 1   | 8260B  |          | 2/27/2020 | CJR     | 1    |
| 1,2-Dibromo-3-chloropropane | < 0.058 | mg/kg | 0.058 | 0.18  | 1   | 8260B  |          | 2/27/2020 | CJR     | 1    |
| Dibromochloromethane        | < 0.025 | mg/kg | 0.025 | 0.079 | 1   | 8260B  |          | 2/27/2020 | CJR     | 1    |
| 1,4-Dichlorobenzene         | < 0.037 | mg/kg | 0.037 | 0.12  | 1   | 8260B  |          | 2/27/2020 | CJR     | 1    |
| 1,3-Dichlorobenzene         | < 0.037 | mg/kg | 0.037 | 0.12  | 1   | 8260B  |          | 2/27/2020 | CJR     | 1    |
| 1,2-Dichlorobenzene         | < 0.028 | mg/kg | 0.028 | 0.088 | 1   | 8260B  |          | 2/27/2020 | CJR     | 1    |
| Dichlorodifluoromethane     | < 0.048 | mg/kg | 0.048 | 0.15  | 1   | 8260B  |          | 2/27/2020 | CJR     | 1    |
| 1,2-Dichloroethane          | < 0.038 | mg/kg | 0.038 | 0.12  | 1   | 8260B  |          | 2/27/2020 | CJR     | 1    |
| 1,1-Dichloroethane          | < 0.034 | mg/kg | 0.034 | 0.11  | 1   | 8260B  |          | 2/27/2020 | CJR     | 1    |

Project Name DB OAK  
Project # 170503

Invoice # E37513

Lab Code 5037513A  
Sample ID WEST TRENCH  
Sample Matrix Soil  
Sample Date 2/18/2020

|                                | Result  | Unit  | LOD   | LOQ   | Dil | Method | Ext Date | Run Date  | Analyst | Code |
|--------------------------------|---------|-------|-------|-------|-----|--------|----------|-----------|---------|------|
| 1,1-Dichloroethene             | < 0.022 | mg/kg | 0.022 | 0.069 | 1   | 8260B  |          | 2/27/2020 | CJR     | 1    |
| cis-1,2-Dichloroethene         | < 0.032 | mg/kg | 0.032 | 0.1   | 1   | 8260B  |          | 2/27/2020 | CJR     | 1    |
| trans-1,2-Dichloroethene       | < 0.028 | mg/kg | 0.028 | 0.09  | 1   | 8260B  |          | 2/27/2020 | CJR     | 1    |
| 1,2-Dichloropropane            | < 0.035 | mg/kg | 0.035 | 0.11  | 1   | 8260B  |          | 2/27/2020 | CJR     | 1    |
| 1,3-Dichloropropane            | < 0.025 | mg/kg | 0.025 | 0.079 | 1   | 8260B  |          | 2/27/2020 | CJR     | 1    |
| trans-1,3-Dichloropropene      | < 0.022 | mg/kg | 0.022 | 0.068 | 1   | 8260B  |          | 2/27/2020 | CJR     | 1    |
| cis-1,3-Dichloropropene        | < 0.039 | mg/kg | 0.039 | 0.12  | 1   | 8260B  |          | 2/27/2020 | CJR     | 1    |
| Di-isopropyl ether             | < 0.01  | mg/kg | 0.01  | 0.032 | 1   | 8260B  |          | 2/27/2020 | CJR     | 1    |
| EDB (1,2-Dibromoethane)        | < 0.023 | mg/kg | 0.023 | 0.072 | 1   | 8260B  |          | 2/27/2020 | CJR     | 1    |
| Ethylbenzene                   | < 0.035 | mg/kg | 0.035 | 0.11  | 1   | 8260B  |          | 2/27/2020 | CJR     | 1    |
| Hexachlorobutadiene            | < 0.085 | mg/kg | 0.085 | 0.27  | 1   | 8260B  |          | 2/27/2020 | CJR     | 1    |
| Isopropylbenzene               | < 0.034 | mg/kg | 0.034 | 0.11  | 1   | 8260B  |          | 2/27/2020 | CJR     | 1    |
| p-Isopropyltoluene             | < 0.029 | mg/kg | 0.029 | 0.093 | 1   | 8260B  |          | 2/27/2020 | CJR     | 1    |
| Methylene chloride             | < 0.15  | mg/kg | 0.15  | 0.46  | 1   | 8260B  |          | 2/27/2020 | CJR     | 1    |
| Methyl tert-butyl ether (MTBE) | < 0.05  | mg/kg | 0.05  | 0.16  | 1   | 8260B  |          | 2/27/2020 | CJR     | 1    |
| Naphthalene                    | < 0.094 | mg/kg | 0.094 | 0.3   | 1   | 8260B  |          | 2/27/2020 | CJR     | 1    |
| n-Propylbenzene                | < 0.033 | mg/kg | 0.033 | 0.1   | 1   | 8260B  |          | 2/27/2020 | CJR     | 1    |
| 1,1,2,2-Tetrachloroethane      | < 0.028 | mg/kg | 0.028 | 0.88  | 1   | 8260B  |          | 2/27/2020 | CJR     | 1    |
| 1,1,1,2-Tetrachloroethane      | < 0.028 | mg/kg | 0.028 | 0.09  | 1   | 8260B  |          | 2/27/2020 | CJR     | 1    |
| Tetrachloroethene              | < 0.032 | mg/kg | 0.032 | 0.1   | 1   | 8260B  |          | 2/27/2020 | CJR     | 1    |
| Toluene                        | 0.235   | mg/kg | 0.032 | 0.1   | 1   | 8260B  |          | 2/27/2020 | CJR     | 1    |
| 1,2,4-Trichlorobenzene         | < 0.064 | mg/kg | 0.064 | 0.2   | 1   | 8260B  |          | 2/27/2020 | CJR     | 1    |
| 1,2,3-Trichlorobenzene         | < 0.066 | mg/kg | 0.066 | 0.21  | 1   | 8260B  |          | 2/27/2020 | CJR     | 1    |
| 1,1,1-Trichloroethane          | < 0.03  | mg/kg | 0.03  | 0.96  | 1   | 8260B  |          | 2/27/2020 | CJR     | 1    |
| 1,1,2-Trichloroethane          | < 0.033 | mg/kg | 0.033 | 0.11  | 1   | 8260B  |          | 2/27/2020 | CJR     | 1    |
| Trichloroethene (TCE)          | < 0.041 | mg/kg | 0.041 | 0.13  | 1   | 8260B  |          | 2/27/2020 | CJR     | 1    |
| Trichlorofluoromethane         | < 0.041 | mg/kg | 0.041 | 0.13  | 1   | 8260B  |          | 2/27/2020 | CJR     | 1    |
| 1,2,4-Trimethylbenzene         | < 0.025 | mg/kg | 0.025 | 0.08  | 1   | 8260B  |          | 2/27/2020 | CJR     | 1    |
| 1,3,5-Trimethylbenzene         | < 0.032 | mg/kg | 0.032 | 0.1   | 1   | 8260B  |          | 2/27/2020 | CJR     | 1    |
| Vinyl Chloride                 | < 0.019 | mg/kg | 0.019 | 0.062 | 1   | 8260B  |          | 2/27/2020 | CJR     | 1    |
| m&p-Xylene                     | < 0.072 | mg/kg | 0.072 | 0.23  | 1   | 8260B  |          | 2/27/2020 | CJR     | 1    |
| o-Xylene                       | < 0.044 | mg/kg | 0.044 | 0.14  | 1   | 8260B  |          | 2/27/2020 | CJR     | 1    |
| SUR - Toluene-d8               | 95      | Rec % |       |       | 1   | 8260B  |          | 2/27/2020 | CJR     | 1    |
| SUR - Dibromofluoromethane     | 99      | Rec % |       |       | 1   | 8260B  |          | 2/27/2020 | CJR     | 1    |
| SUR - 1,2-Dichloroethane-d4    | 99      | Rec % |       |       | 1   | 8260B  |          | 2/27/2020 | CJR     | 1    |
| SUR - 4-Bromofluorobenzene     | 98      | Rec % |       |       | 1   | 8260B  |          | 2/27/2020 | CJR     | 1    |

**Project Name** DB OAK  
**Project #** 170503

**Invoice #** E37513

**Lab Code** 5037513B  
**Sample ID** MID TRENCH  
**Sample Matrix** Soil  
**Sample Date** 2/18/2020

|                                | Result  | Unit  | LOD   | LOQ   | Dil | Method | Ext Date | Run Date  | Analyst | Code |
|--------------------------------|---------|-------|-------|-------|-----|--------|----------|-----------|---------|------|
| General                        |         |       |       |       |     |        |          |           |         |      |
| General                        |         |       |       |       |     |        |          |           |         |      |
| Solids Percent                 | 96.7    | %     |       |       | 1   | 5021   |          | 2/20/2020 | NJC     | 1    |
| Organic                        |         |       |       |       |     |        |          |           |         |      |
| VOC's                          |         |       |       |       |     |        |          |           |         |      |
| Benzene                        | < 0.03  | mg/kg | 0.03  | 0.096 | 1   | 8260B  |          | 2/26/2020 | CJR     | 1    |
| Bromobenzene                   | < 0.025 | mg/kg | 0.025 | 0.081 | 1   | 8260B  |          | 2/26/2020 | CJR     | 1    |
| Bromodichloromethane           | < 0.074 | mg/kg | 0.074 | 0.24  | 1   | 8260B  |          | 2/26/2020 | CJR     | 1    |
| Bromoform                      | < 0.029 | mg/kg | 0.029 | 0.092 | 1   | 8260B  |          | 2/26/2020 | CJR     | 1    |
| tert-Butylbenzene              | < 0.026 | mg/kg | 0.026 | 0.084 | 1   | 8260B  |          | 2/26/2020 | CJR     | 1    |
| sec-Butylbenzene               | < 0.033 | mg/kg | 0.033 | 0.1   | 1   | 8260B  |          | 2/26/2020 | CJR     | 1    |
| n-Butylbenzene                 | < 0.04  | mg/kg | 0.04  | 0.13  | 1   | 8260B  |          | 2/26/2020 | CJR     | 1    |
| Carbon Tetrachloride           | < 0.016 | mg/kg | 0.016 | 0.053 | 1   | 8260B  |          | 2/26/2020 | CJR     | 1    |
| Chlorobenzene                  | < 0.013 | mg/kg | 0.013 | 0.04  | 1   | 8260B  |          | 2/26/2020 | CJR     | 1    |
| Chloroethane                   | < 0.091 | mg/kg | 0.091 | 0.29  | 1   | 8260B  |          | 2/26/2020 | CJR     | 1    |
| Chloroform                     | < 0.035 | mg/kg | 0.035 | 0.11  | 1   | 8260B  |          | 2/26/2020 | CJR     | 1    |
| Chloromethane                  | < 0.076 | mg/kg | 0.076 | 0.24  | 1   | 8260B  |          | 2/26/2020 | CJR     | 1    |
| 2-Chlorotoluene                | < 0.015 | mg/kg | 0.015 | 0.047 | 1   | 8260B  |          | 2/26/2020 | CJR     | 1    |
| 4-Chlorotoluene                | < 0.018 | mg/kg | 0.018 | 0.057 | 1   | 8260B  |          | 2/26/2020 | CJR     | 1    |
| 1,2-Dibromo-3-chloropropane    | < 0.058 | mg/kg | 0.058 | 0.18  | 1   | 8260B  |          | 2/26/2020 | CJR     | 1    |
| Dibromochloromethane           | < 0.025 | mg/kg | 0.025 | 0.079 | 1   | 8260B  |          | 2/26/2020 | CJR     | 1    |
| 1,4-Dichlorobenzene            | < 0.037 | mg/kg | 0.037 | 0.12  | 1   | 8260B  |          | 2/26/2020 | CJR     | 1    |
| 1,3-Dichlorobenzene            | < 0.037 | mg/kg | 0.037 | 0.12  | 1   | 8260B  |          | 2/26/2020 | CJR     | 1    |
| 1,2-Dichlorobenzene            | < 0.028 | mg/kg | 0.028 | 0.088 | 1   | 8260B  |          | 2/26/2020 | CJR     | 1    |
| Dichlorodifluoromethane        | < 0.048 | mg/kg | 0.048 | 0.15  | 1   | 8260B  |          | 2/26/2020 | CJR     | 1    |
| 1,2-Dichloroethane             | < 0.038 | mg/kg | 0.038 | 0.12  | 1   | 8260B  |          | 2/26/2020 | CJR     | 1    |
| 1,1-Dichloroethane             | < 0.034 | mg/kg | 0.034 | 0.11  | 1   | 8260B  |          | 2/26/2020 | CJR     | 1    |
| 1,1-Dichloroethene             | < 0.022 | mg/kg | 0.022 | 0.069 | 1   | 8260B  |          | 2/26/2020 | CJR     | 1    |
| cis-1,2-Dichloroethene         | < 0.032 | mg/kg | 0.032 | 0.1   | 1   | 8260B  |          | 2/26/2020 | CJR     | 1    |
| trans-1,2-Dichloroethene       | < 0.028 | mg/kg | 0.028 | 0.09  | 1   | 8260B  |          | 2/26/2020 | CJR     | 1    |
| 1,2-Dichloropropane            | < 0.035 | mg/kg | 0.035 | 0.11  | 1   | 8260B  |          | 2/26/2020 | CJR     | 1    |
| 1,3-Dichloropropane            | < 0.025 | mg/kg | 0.025 | 0.079 | 1   | 8260B  |          | 2/26/2020 | CJR     | 1    |
| trans-1,3-Dichloropropene      | < 0.022 | mg/kg | 0.022 | 0.068 | 1   | 8260B  |          | 2/26/2020 | CJR     | 1    |
| cis-1,3-Dichloropropene        | < 0.039 | mg/kg | 0.039 | 0.12  | 1   | 8260B  |          | 2/26/2020 | CJR     | 1    |
| Di-isopropyl ether             | < 0.01  | mg/kg | 0.01  | 0.032 | 1   | 8260B  |          | 2/26/2020 | CJR     | 1    |
| EDB (1,2-Dibromoethane)        | < 0.023 | mg/kg | 0.023 | 0.072 | 1   | 8260B  |          | 2/26/2020 | CJR     | 1    |
| Ethylbenzene                   | < 0.035 | mg/kg | 0.035 | 0.11  | 1   | 8260B  |          | 2/26/2020 | CJR     | 1    |
| Hexachlorobutadiene            | < 0.085 | mg/kg | 0.085 | 0.27  | 1   | 8260B  |          | 2/26/2020 | CJR     | 1    |
| Isopropylbenzene               | < 0.034 | mg/kg | 0.034 | 0.11  | 1   | 8260B  |          | 2/26/2020 | CJR     | 1    |
| p-Isopropyltoluene             | < 0.029 | mg/kg | 0.029 | 0.093 | 1   | 8260B  |          | 2/26/2020 | CJR     | 1    |
| Methylene chloride             | < 0.15  | mg/kg | 0.15  | 0.46  | 1   | 8260B  |          | 2/26/2020 | CJR     | 1    |
| Methyl tert-butyl ether (MTBE) | < 0.05  | mg/kg | 0.05  | 0.16  | 1   | 8260B  |          | 2/26/2020 | CJR     | 1    |
| Naphthalene                    | < 0.094 | mg/kg | 0.094 | 0.3   | 1   | 8260B  |          | 2/26/2020 | CJR     | 1    |
| n-Propylbenzene                | < 0.033 | mg/kg | 0.033 | 0.1   | 1   | 8260B  |          | 2/26/2020 | CJR     | 1    |
| 1,1,2,2-Tetrachloroethane      | < 0.028 | mg/kg | 0.028 | 0.88  | 1   | 8260B  |          | 2/26/2020 | CJR     | 1    |
| 1,1,1,2-Tetrachloroethane      | < 0.028 | mg/kg | 0.028 | 0.09  | 1   | 8260B  |          | 2/26/2020 | CJR     | 1    |

**Project Name** DB OAK  
**Project #** 170503

**Invoice #** E37513

**Lab Code** 5037513B  
**Sample ID** MID TRENCH  
**Sample Matrix** Soil  
**Sample Date** 2/18/2020

|                             | <b>Result</b> | <b>Unit</b> | <b>LOD</b> | <b>LOQ</b> | <b>Dil</b> | <b>Method</b> | <b>Ext Date</b> | <b>Run Date</b> | <b>Analyst</b> | <b>Code</b> |
|-----------------------------|---------------|-------------|------------|------------|------------|---------------|-----------------|-----------------|----------------|-------------|
| Tetrachloroethene           | 0.212         | mg/kg       | 0.032      | 0.1        | 1          | 8260B         |                 | 2/26/2020       | CJR            | 1           |
| Toluene                     | 0.16          | mg/kg       | 0.032      | 0.1        | 1          | 8260B         |                 | 2/26/2020       | CJR            | 1           |
| 1,2,4-Trichlorobenzene      | < 0.064       | mg/kg       | 0.064      | 0.2        | 1          | 8260B         |                 | 2/26/2020       | CJR            | 1           |
| 1,2,3-Trichlorobenzene      | < 0.066       | mg/kg       | 0.066      | 0.21       | 1          | 8260B         |                 | 2/26/2020       | CJR            | 1           |
| 1,1,1-Trichloroethane       | < 0.03        | mg/kg       | 0.03       | 0.96       | 1          | 8260B         |                 | 2/26/2020       | CJR            | 1           |
| 1,1,2-Trichloroethane       | < 0.033       | mg/kg       | 0.033      | 0.11       | 1          | 8260B         |                 | 2/26/2020       | CJR            | 1           |
| Trichloroethene (TCE)       | < 0.041       | mg/kg       | 0.041      | 0.13       | 1          | 8260B         |                 | 2/26/2020       | CJR            | 1           |
| Trichlorofluoromethane      | < 0.041       | mg/kg       | 0.041      | 0.13       | 1          | 8260B         |                 | 2/26/2020       | CJR            | 1           |
| 1,2,4-Trimethylbenzene      | < 0.025       | mg/kg       | 0.025      | 0.08       | 1          | 8260B         |                 | 2/26/2020       | CJR            | 1           |
| 1,3,5-Trimethylbenzene      | < 0.032       | mg/kg       | 0.032      | 0.1        | 1          | 8260B         |                 | 2/26/2020       | CJR            | 1           |
| Vinyl Chloride              | < 0.019       | mg/kg       | 0.019      | 0.062      | 1          | 8260B         |                 | 2/26/2020       | CJR            | 1           |
| m&p-Xylene                  | < 0.072       | mg/kg       | 0.072      | 0.23       | 1          | 8260B         |                 | 2/26/2020       | CJR            | 1           |
| o-Xylene                    | < 0.044       | mg/kg       | 0.044      | 0.14       | 1          | 8260B         |                 | 2/26/2020       | CJR            | 1           |
| SUR - 1,2-Dichloroethane-d4 | 108           | Rec %       |            |            | 1          | 8260B         |                 | 2/26/2020       | CJR            | 1           |
| SUR - 4-Bromofluorobenzene  | 95            | Rec %       |            |            | 1          | 8260B         |                 | 2/26/2020       | CJR            | 1           |
| SUR - Dibromofluoromethane  | 105           | Rec %       |            |            | 1          | 8260B         |                 | 2/26/2020       | CJR            | 1           |
| SUR - Toluene-d8            | 98            | Rec %       |            |            | 1          | 8260B         |                 | 2/26/2020       | CJR            | 1           |

**Project Name** DB OAK  
**Project #** 170503

**Invoice #** E37513

**Lab Code** 5037513C  
**Sample ID** EAST TRENCH  
**Sample Matrix** Soil  
**Sample Date** 2/18/2020

|                                | Result  | Unit  | LOD   | LOQ   | Dil | Method | Ext Date | Run Date  | Analyst | Code |
|--------------------------------|---------|-------|-------|-------|-----|--------|----------|-----------|---------|------|
| General                        |         |       |       |       |     |        |          |           |         |      |
| General                        |         |       |       |       |     |        |          |           |         |      |
| Solids Percent                 | 95.0    | %     |       |       | 1   | 5021   |          | 2/20/2020 | NJC     | 1    |
| Organic                        |         |       |       |       |     |        |          |           |         |      |
| VOC's                          |         |       |       |       |     |        |          |           |         |      |
| Benzene                        | < 0.03  | mg/kg | 0.03  | 0.096 | 1   | 8260B  |          | 2/26/2020 | CJR     | 1    |
| Bromobenzene                   | < 0.025 | mg/kg | 0.025 | 0.081 | 1   | 8260B  |          | 2/26/2020 | CJR     | 1    |
| Bromodichloromethane           | < 0.074 | mg/kg | 0.074 | 0.24  | 1   | 8260B  |          | 2/26/2020 | CJR     | 1    |
| Bromoform                      | < 0.029 | mg/kg | 0.029 | 0.092 | 1   | 8260B  |          | 2/26/2020 | CJR     | 1    |
| tert-Butylbenzene              | < 0.026 | mg/kg | 0.026 | 0.084 | 1   | 8260B  |          | 2/26/2020 | CJR     | 1    |
| sec-Butylbenzene               | < 0.033 | mg/kg | 0.033 | 0.1   | 1   | 8260B  |          | 2/26/2020 | CJR     | 1    |
| n-Butylbenzene                 | < 0.04  | mg/kg | 0.04  | 0.13  | 1   | 8260B  |          | 2/26/2020 | CJR     | 1    |
| Carbon Tetrachloride           | < 0.016 | mg/kg | 0.016 | 0.053 | 1   | 8260B  |          | 2/26/2020 | CJR     | 1    |
| Chlorobenzene                  | < 0.013 | mg/kg | 0.013 | 0.04  | 1   | 8260B  |          | 2/26/2020 | CJR     | 1    |
| Chloroethane                   | < 0.091 | mg/kg | 0.091 | 0.29  | 1   | 8260B  |          | 2/26/2020 | CJR     | 1    |
| Chloroform                     | < 0.035 | mg/kg | 0.035 | 0.11  | 1   | 8260B  |          | 2/26/2020 | CJR     | 1    |
| Chloromethane                  | < 0.076 | mg/kg | 0.076 | 0.24  | 1   | 8260B  |          | 2/26/2020 | CJR     | 1    |
| 2-Chlorotoluene                | < 0.015 | mg/kg | 0.015 | 0.047 | 1   | 8260B  |          | 2/26/2020 | CJR     | 1    |
| 4-Chlorotoluene                | < 0.018 | mg/kg | 0.018 | 0.057 | 1   | 8260B  |          | 2/26/2020 | CJR     | 1    |
| 1,2-Dibromo-3-chloropropane    | < 0.058 | mg/kg | 0.058 | 0.18  | 1   | 8260B  |          | 2/26/2020 | CJR     | 1    |
| Dibromochloromethane           | < 0.025 | mg/kg | 0.025 | 0.079 | 1   | 8260B  |          | 2/26/2020 | CJR     | 1    |
| 1,4-Dichlorobenzene            | < 0.037 | mg/kg | 0.037 | 0.12  | 1   | 8260B  |          | 2/26/2020 | CJR     | 1    |
| 1,3-Dichlorobenzene            | < 0.037 | mg/kg | 0.037 | 0.12  | 1   | 8260B  |          | 2/26/2020 | CJR     | 1    |
| 1,2-Dichlorobenzene            | < 0.028 | mg/kg | 0.028 | 0.088 | 1   | 8260B  |          | 2/26/2020 | CJR     | 1    |
| Dichlorodifluoromethane        | < 0.048 | mg/kg | 0.048 | 0.15  | 1   | 8260B  |          | 2/26/2020 | CJR     | 1    |
| 1,2-Dichloroethane             | < 0.038 | mg/kg | 0.038 | 0.12  | 1   | 8260B  |          | 2/26/2020 | CJR     | 1    |
| 1,1-Dichloroethane             | < 0.034 | mg/kg | 0.034 | 0.11  | 1   | 8260B  |          | 2/26/2020 | CJR     | 1    |
| 1,1-Dichloroethene             | < 0.022 | mg/kg | 0.022 | 0.069 | 1   | 8260B  |          | 2/26/2020 | CJR     | 1    |
| cis-1,2-Dichloroethene         | < 0.032 | mg/kg | 0.032 | 0.1   | 1   | 8260B  |          | 2/26/2020 | CJR     | 1    |
| trans-1,2-Dichloroethene       | < 0.028 | mg/kg | 0.028 | 0.09  | 1   | 8260B  |          | 2/26/2020 | CJR     | 1    |
| 1,2-Dichloropropane            | < 0.035 | mg/kg | 0.035 | 0.11  | 1   | 8260B  |          | 2/26/2020 | CJR     | 1    |
| 1,3-Dichloropropane            | < 0.025 | mg/kg | 0.025 | 0.079 | 1   | 8260B  |          | 2/26/2020 | CJR     | 1    |
| trans-1,3-Dichloropropene      | < 0.022 | mg/kg | 0.022 | 0.068 | 1   | 8260B  |          | 2/26/2020 | CJR     | 1    |
| cis-1,3-Dichloropropene        | < 0.039 | mg/kg | 0.039 | 0.12  | 1   | 8260B  |          | 2/26/2020 | CJR     | 1    |
| Di-isopropyl ether             | < 0.01  | mg/kg | 0.01  | 0.032 | 1   | 8260B  |          | 2/26/2020 | CJR     | 1    |
| EDB (1,2-Dibromoethane)        | < 0.023 | mg/kg | 0.023 | 0.072 | 1   | 8260B  |          | 2/26/2020 | CJR     | 1    |
| Ethylbenzene                   | < 0.035 | mg/kg | 0.035 | 0.11  | 1   | 8260B  |          | 2/26/2020 | CJR     | 1    |
| Hexachlorobutadiene            | < 0.085 | mg/kg | 0.085 | 0.27  | 1   | 8260B  |          | 2/26/2020 | CJR     | 1    |
| Isopropylbenzene               | < 0.034 | mg/kg | 0.034 | 0.11  | 1   | 8260B  |          | 2/26/2020 | CJR     | 1    |
| p-Isopropyltoluene             | < 0.029 | mg/kg | 0.029 | 0.093 | 1   | 8260B  |          | 2/26/2020 | CJR     | 1    |
| Methylene chloride             | < 0.15  | mg/kg | 0.15  | 0.46  | 1   | 8260B  |          | 2/26/2020 | CJR     | 1    |
| Methyl tert-butyl ether (MTBE) | < 0.05  | mg/kg | 0.05  | 0.16  | 1   | 8260B  |          | 2/26/2020 | CJR     | 1    |
| Naphthalene                    | < 0.094 | mg/kg | 0.094 | 0.3   | 1   | 8260B  |          | 2/26/2020 | CJR     | 1    |
| n-Propylbenzene                | < 0.033 | mg/kg | 0.033 | 0.1   | 1   | 8260B  |          | 2/26/2020 | CJR     | 1    |
| 1,1,2,2-Tetrachloroethane      | < 0.028 | mg/kg | 0.028 | 0.88  | 1   | 8260B  |          | 2/26/2020 | CJR     | 1    |
| 1,1,1,2-Tetrachloroethane      | < 0.028 | mg/kg | 0.028 | 0.09  | 1   | 8260B  |          | 2/26/2020 | CJR     | 1    |

**Project Name** DB OAK  
**Project #** 170503

**Invoice #** E37513

**Lab Code** 5037513C  
**Sample ID** EAST TRENCH  
**Sample Matrix** Soil  
**Sample Date** 2/18/2020

|                             | Result    | Unit  | LOD   | LOQ   | Dil | Method | Ext Date | Run Date  | Analyst | Code |
|-----------------------------|-----------|-------|-------|-------|-----|--------|----------|-----------|---------|------|
| Tetrachloroethene           | 0.63      | mg/kg | 0.032 | 0.1   | 1   | 8260B  |          | 2/26/2020 | CJR     | 1    |
| Toluene                     | 0.222     | mg/kg | 0.032 | 0.1   | 1   | 8260B  |          | 2/26/2020 | CJR     | 1    |
| 1,2,4-Trichlorobenzene      | < 0.064   | mg/kg | 0.064 | 0.2   | 1   | 8260B  |          | 2/26/2020 | CJR     | 1    |
| 1,2,3-Trichlorobenzene      | < 0.066   | mg/kg | 0.066 | 0.21  | 1   | 8260B  |          | 2/26/2020 | CJR     | 1    |
| 1,1,1-Trichloroethane       | < 0.03    | mg/kg | 0.03  | 0.96  | 1   | 8260B  |          | 2/26/2020 | CJR     | 1    |
| 1,1,2-Trichloroethane       | < 0.033   | mg/kg | 0.033 | 0.11  | 1   | 8260B  |          | 2/26/2020 | CJR     | 1    |
| Trichloroethene (TCE)       | 0.083 "J" | mg/kg | 0.041 | 0.13  | 1   | 8260B  |          | 2/26/2020 | CJR     | 1    |
| Trichlorofluoromethane      | < 0.041   | mg/kg | 0.041 | 0.13  | 1   | 8260B  |          | 2/26/2020 | CJR     | 1    |
| 1,2,4-Trimethylbenzene      | < 0.025   | mg/kg | 0.025 | 0.08  | 1   | 8260B  |          | 2/26/2020 | CJR     | 1    |
| 1,3,5-Trimethylbenzene      | < 0.032   | mg/kg | 0.032 | 0.1   | 1   | 8260B  |          | 2/26/2020 | CJR     | 1    |
| Vinyl Chloride              | < 0.019   | mg/kg | 0.019 | 0.062 | 1   | 8260B  |          | 2/26/2020 | CJR     | 1    |
| m&p-Xylene                  | < 0.072   | mg/kg | 0.072 | 0.23  | 1   | 8260B  |          | 2/26/2020 | CJR     | 1    |
| o-Xylene                    | < 0.044   | mg/kg | 0.044 | 0.14  | 1   | 8260B  |          | 2/26/2020 | CJR     | 1    |
| SUR - Toluene-d8            | 101       | Rec % |       |       | 1   | 8260B  |          | 2/26/2020 | CJR     | 1    |
| SUR - 1,2-Dichloroethane-d4 | 99        | Rec % |       |       | 1   | 8260B  |          | 2/26/2020 | CJR     | 1    |
| SUR - 4-Bromofluorobenzene  | 94        | Rec % |       |       | 1   | 8260B  |          | 2/26/2020 | CJR     | 1    |
| SUR - Dibromofluoromethane  | 108       | Rec % |       |       | 1   | 8260B  |          | 2/26/2020 | CJR     | 1    |

"J" Flag: Analyte detected between LOD and LOQ

LOD Limit of Detection

LOQ Limit of Quantitation

**Code**      **Comment**

1      Laboratory QC within limits.

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

**Authorized Signature**





# Synergy Environmental Lab, INC

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

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

Report Date 11-Mar-20

Project Name DB OAK  
Project # 170503

Invoice # E37560

Lab Code 5037560A  
Sample ID TRUCK MID  
Sample Matrix Soil  
Sample Date 2/25/2020

|                             | Result  | Unit  | LOD   | LOQ   | Dil | Method | Ext Date | Run Date | Analyst | Code |
|-----------------------------|---------|-------|-------|-------|-----|--------|----------|----------|---------|------|
| General                     |         |       |       |       |     |        |          |          |         |      |
| General                     |         |       |       |       |     |        |          |          |         |      |
| Solids Percent              | 93.9    | %     |       |       | 1   | 5021   |          | 3/2/2020 | NJC     | 1    |
| Organic                     |         |       |       |       |     |        |          |          |         |      |
| VOC's                       |         |       |       |       |     |        |          |          |         |      |
| Benzene                     | < 0.03  | mg/kg | 0.03  | 0.096 | 1   | 8260B  |          | 3/9/2020 | CJR     | 1    |
| Bromobenzene                | < 0.025 | mg/kg | 0.025 | 0.081 | 1   | 8260B  |          | 3/9/2020 | CJR     | 1    |
| Bromodichloromethane        | < 0.074 | mg/kg | 0.074 | 0.24  | 1   | 8260B  |          | 3/9/2020 | CJR     | 1    |
| Bromoform                   | < 0.029 | mg/kg | 0.029 | 0.092 | 1   | 8260B  |          | 3/9/2020 | CJR     | 1    |
| tert-Butylbenzene           | < 0.026 | mg/kg | 0.026 | 0.084 | 1   | 8260B  |          | 3/9/2020 | CJR     | 1    |
| sec-Butylbenzene            | < 0.033 | mg/kg | 0.033 | 0.1   | 1   | 8260B  |          | 3/9/2020 | CJR     | 1    |
| n-Butylbenzene              | < 0.04  | mg/kg | 0.04  | 0.13  | 1   | 8260B  |          | 3/9/2020 | CJR     | 1    |
| Carbon Tetrachloride        | < 0.016 | mg/kg | 0.016 | 0.053 | 1   | 8260B  |          | 3/9/2020 | CJR     | 1    |
| Chlorobenzene               | < 0.013 | mg/kg | 0.013 | 0.04  | 1   | 8260B  |          | 3/9/2020 | CJR     | 1    |
| Chloroethane                | < 0.091 | mg/kg | 0.091 | 0.29  | 1   | 8260B  |          | 3/9/2020 | CJR     | 1    |
| Chloroform                  | < 0.035 | mg/kg | 0.035 | 0.11  | 1   | 8260B  |          | 3/9/2020 | CJR     | 1    |
| Chloromethane               | < 0.076 | mg/kg | 0.076 | 0.24  | 1   | 8260B  |          | 3/9/2020 | CJR     | 1    |
| 2-Chlorotoluene             | < 0.015 | mg/kg | 0.015 | 0.047 | 1   | 8260B  |          | 3/9/2020 | CJR     | 1    |
| 4-Chlorotoluene             | < 0.018 | mg/kg | 0.018 | 0.057 | 1   | 8260B  |          | 3/9/2020 | CJR     | 1    |
| 1,2-Dibromo-3-chloropropane | < 0.058 | mg/kg | 0.058 | 0.18  | 1   | 8260B  |          | 3/9/2020 | CJR     | 1    |
| Dibromochloromethane        | < 0.025 | mg/kg | 0.025 | 0.079 | 1   | 8260B  |          | 3/9/2020 | CJR     | 1    |
| 1,4-Dichlorobenzene         | < 0.037 | mg/kg | 0.037 | 0.12  | 1   | 8260B  |          | 3/9/2020 | CJR     | 1    |
| 1,3-Dichlorobenzene         | < 0.037 | mg/kg | 0.037 | 0.12  | 1   | 8260B  |          | 3/9/2020 | CJR     | 1    |
| 1,2-Dichlorobenzene         | < 0.028 | mg/kg | 0.028 | 0.088 | 1   | 8260B  |          | 3/9/2020 | CJR     | 1    |
| Dichlorodifluoromethane     | < 0.048 | mg/kg | 0.048 | 0.15  | 1   | 8260B  |          | 3/9/2020 | CJR     | 1    |
| 1,2-Dichloroethane          | < 0.038 | mg/kg | 0.038 | 0.12  | 1   | 8260B  |          | 3/9/2020 | CJR     | 1    |
| 1,1-Dichloroethane          | < 0.034 | mg/kg | 0.034 | 0.11  | 1   | 8260B  |          | 3/9/2020 | CJR     | 1    |

**Project Name** DB OAK  
**Project #** 170503

**Invoice #** E37560

**Lab Code** 5037560A  
**Sample ID** TRUCK MID  
**Sample Matrix** Soil  
**Sample Date** 2/25/2020

|                                | Result    | Unit  | LOD   | LOQ   | Dil | Method | Ext Date | Run Date | Analyst | Code |
|--------------------------------|-----------|-------|-------|-------|-----|--------|----------|----------|---------|------|
| 1,1-Dichloroethene             | < 0.022   | mg/kg | 0.022 | 0.069 | 1   | 8260B  |          | 3/9/2020 | CJR     | 1    |
| cis-1,2-Dichloroethene         | < 0.032   | mg/kg | 0.032 | 0.1   | 1   | 8260B  |          | 3/9/2020 | CJR     | 1    |
| trans-1,2-Dichloroethene       | < 0.028   | mg/kg | 0.028 | 0.09  | 1   | 8260B  |          | 3/9/2020 | CJR     | 1    |
| 1,2-Dichloropropane            | < 0.035   | mg/kg | 0.035 | 0.11  | 1   | 8260B  |          | 3/9/2020 | CJR     | 1    |
| 1,3-Dichloropropane            | < 0.025   | mg/kg | 0.025 | 0.079 | 1   | 8260B  |          | 3/9/2020 | CJR     | 1    |
| trans-1,3-Dichloropropene      | < 0.022   | mg/kg | 0.022 | 0.068 | 1   | 8260B  |          | 3/9/2020 | CJR     | 1    |
| cis-1,3-Dichloropropene        | < 0.039   | mg/kg | 0.039 | 0.12  | 1   | 8260B  |          | 3/9/2020 | CJR     | 1    |
| Di-isopropyl ether             | < 0.01    | mg/kg | 0.01  | 0.032 | 1   | 8260B  |          | 3/9/2020 | CJR     | 1    |
| EDB (1,2-Dibromoethane)        | < 0.023   | mg/kg | 0.023 | 0.072 | 1   | 8260B  |          | 3/9/2020 | CJR     | 1    |
| Ethylbenzene                   | < 0.035   | mg/kg | 0.035 | 0.11  | 1   | 8260B  |          | 3/9/2020 | CJR     | 1    |
| Hexachlorobutadiene            | < 0.085   | mg/kg | 0.085 | 0.27  | 1   | 8260B  |          | 3/9/2020 | CJR     | 1    |
| Isopropylbenzene               | < 0.034   | mg/kg | 0.034 | 0.11  | 1   | 8260B  |          | 3/9/2020 | CJR     | 1    |
| p-Isopropyltoluene             | < 0.029   | mg/kg | 0.029 | 0.093 | 1   | 8260B  |          | 3/9/2020 | CJR     | 1    |
| Methylene chloride             | < 0.15    | mg/kg | 0.15  | 0.46  | 1   | 8260B  |          | 3/9/2020 | CJR     | 1    |
| Methyl tert-butyl ether (MTBE) | < 0.05    | mg/kg | 0.05  | 0.16  | 1   | 8260B  |          | 3/9/2020 | CJR     | 1    |
| Naphthalene                    | < 0.094   | mg/kg | 0.094 | 0.3   | 1   | 8260B  |          | 3/9/2020 | CJR     | 1    |
| n-Propylbenzene                | < 0.033   | mg/kg | 0.033 | 0.1   | 1   | 8260B  |          | 3/9/2020 | CJR     | 1    |
| 1,1,2,2-Tetrachloroethane      | < 0.028   | mg/kg | 0.028 | 0.88  | 1   | 8260B  |          | 3/9/2020 | CJR     | 1    |
| 1,1,1,2-Tetrachloroethane      | < 0.028   | mg/kg | 0.028 | 0.09  | 1   | 8260B  |          | 3/9/2020 | CJR     | 1    |
| Tetrachloroethene              | 0.085 "J" | mg/kg | 0.032 | 0.1   | 1   | 8260B  |          | 3/9/2020 | CJR     | 1    |
| Toluene                        | 0.268     | mg/kg | 0.032 | 0.1   | 1   | 8260B  |          | 3/9/2020 | CJR     | 1    |
| 1,2,4-Trichlorobenzene         | < 0.064   | mg/kg | 0.064 | 0.2   | 1   | 8260B  |          | 3/9/2020 | CJR     | 1    |
| 1,2,3-Trichlorobenzene         | < 0.066   | mg/kg | 0.066 | 0.21  | 1   | 8260B  |          | 3/9/2020 | CJR     | 1    |
| 1,1,1-Trichloroethane          | < 0.03    | mg/kg | 0.03  | 0.96  | 1   | 8260B  |          | 3/9/2020 | CJR     | 1    |
| 1,1,2-Trichloroethane          | < 0.033   | mg/kg | 0.033 | 0.11  | 1   | 8260B  |          | 3/9/2020 | CJR     | 1    |
| Trichloroethene (TCE)          | < 0.041   | mg/kg | 0.041 | 0.13  | 1   | 8260B  |          | 3/9/2020 | CJR     | 1    |
| Trichlorofluoromethane         | < 0.041   | mg/kg | 0.041 | 0.13  | 1   | 8260B  |          | 3/9/2020 | CJR     | 1    |
| 1,2,4-Trimethylbenzene         | < 0.025   | mg/kg | 0.025 | 0.08  | 1   | 8260B  |          | 3/9/2020 | CJR     | 1    |
| 1,3,5-Trimethylbenzene         | < 0.032   | mg/kg | 0.032 | 0.1   | 1   | 8260B  |          | 3/9/2020 | CJR     | 1    |
| Vinyl Chloride                 | < 0.019   | mg/kg | 0.019 | 0.062 | 1   | 8260B  |          | 3/9/2020 | CJR     | 1    |
| m&p-Xylene                     | < 0.072   | mg/kg | 0.072 | 0.23  | 1   | 8260B  |          | 3/9/2020 | CJR     | 1    |
| o-Xylene                       | < 0.044   | mg/kg | 0.044 | 0.14  | 1   | 8260B  |          | 3/9/2020 | CJR     | 1    |
| SUR - Toluene-d8               | 106       | Rec % |       |       | 1   | 8260B  |          | 3/9/2020 | CJR     | 1    |
| SUR - 1,2-Dichloroethane-d4    | 111       | Rec % |       |       | 1   | 8260B  |          | 3/9/2020 | CJR     | 1    |
| SUR - 4-Bromofluorobenzene     | 95        | Rec % |       |       | 1   | 8260B  |          | 3/9/2020 | CJR     | 1    |
| SUR - Dibromofluoromethane     | 123       | Rec % |       |       | 1   | 8260B  |          | 3/9/2020 | CJR     | 1    |

**Project Name** DB OAK  
**Project #** 170503

**Invoice #** E37560

**Lab Code** 5037560B  
**Sample ID** EAST IN PLACE  
**Sample Matrix** Soil  
**Sample Date** 2/25/2020

|                                | Result  | Unit  | LOD   | LOQ   | Dil | Method | Ext Date | Run Date | Analyst | Code |
|--------------------------------|---------|-------|-------|-------|-----|--------|----------|----------|---------|------|
| General                        |         |       |       |       |     |        |          |          |         |      |
| General                        |         |       |       |       |     |        |          |          |         |      |
| Solids Percent                 | 94.2    | %     |       |       | 1   | 5021   |          | 3/2/2020 | NJC     | 1    |
| Organic                        |         |       |       |       |     |        |          |          |         |      |
| VOC's                          |         |       |       |       |     |        |          |          |         |      |
| Benzene                        | < 0.03  | mg/kg | 0.03  | 0.096 | 1   | 8260B  |          | 3/9/2020 | CJR     | 1    |
| Bromobenzene                   | < 0.025 | mg/kg | 0.025 | 0.081 | 1   | 8260B  |          | 3/9/2020 | CJR     | 1    |
| Bromodichloromethane           | < 0.074 | mg/kg | 0.074 | 0.24  | 1   | 8260B  |          | 3/9/2020 | CJR     | 1    |
| Bromoform                      | < 0.029 | mg/kg | 0.029 | 0.092 | 1   | 8260B  |          | 3/9/2020 | CJR     | 1    |
| tert-Butylbenzene              | < 0.026 | mg/kg | 0.026 | 0.084 | 1   | 8260B  |          | 3/9/2020 | CJR     | 1    |
| sec-Butylbenzene               | < 0.033 | mg/kg | 0.033 | 0.1   | 1   | 8260B  |          | 3/9/2020 | CJR     | 1    |
| n-Butylbenzene                 | < 0.04  | mg/kg | 0.04  | 0.13  | 1   | 8260B  |          | 3/9/2020 | CJR     | 1    |
| Carbon Tetrachloride           | < 0.016 | mg/kg | 0.016 | 0.053 | 1   | 8260B  |          | 3/9/2020 | CJR     | 1    |
| Chlorobenzene                  | < 0.013 | mg/kg | 0.013 | 0.04  | 1   | 8260B  |          | 3/9/2020 | CJR     | 1    |
| Chloroethane                   | < 0.091 | mg/kg | 0.091 | 0.29  | 1   | 8260B  |          | 3/9/2020 | CJR     | 1    |
| Chloroform                     | < 0.035 | mg/kg | 0.035 | 0.11  | 1   | 8260B  |          | 3/9/2020 | CJR     | 1    |
| Chloromethane                  | < 0.076 | mg/kg | 0.076 | 0.24  | 1   | 8260B  |          | 3/9/2020 | CJR     | 1    |
| 2-Chlorotoluene                | < 0.015 | mg/kg | 0.015 | 0.047 | 1   | 8260B  |          | 3/9/2020 | CJR     | 1    |
| 4-Chlorotoluene                | < 0.018 | mg/kg | 0.018 | 0.057 | 1   | 8260B  |          | 3/9/2020 | CJR     | 1    |
| 1,2-Dibromo-3-chloropropane    | < 0.058 | mg/kg | 0.058 | 0.18  | 1   | 8260B  |          | 3/9/2020 | CJR     | 1    |
| Dibromochloromethane           | < 0.025 | mg/kg | 0.025 | 0.079 | 1   | 8260B  |          | 3/9/2020 | CJR     | 1    |
| 1,4-Dichlorobenzene            | < 0.037 | mg/kg | 0.037 | 0.12  | 1   | 8260B  |          | 3/9/2020 | CJR     | 1    |
| 1,3-Dichlorobenzene            | < 0.037 | mg/kg | 0.037 | 0.12  | 1   | 8260B  |          | 3/9/2020 | CJR     | 1    |
| 1,2-Dichlorobenzene            | < 0.028 | mg/kg | 0.028 | 0.088 | 1   | 8260B  |          | 3/9/2020 | CJR     | 1    |
| Dichlorodifluoromethane        | < 0.048 | mg/kg | 0.048 | 0.15  | 1   | 8260B  |          | 3/9/2020 | CJR     | 1    |
| 1,2-Dichloroethane             | < 0.038 | mg/kg | 0.038 | 0.12  | 1   | 8260B  |          | 3/9/2020 | CJR     | 1    |
| 1,1-Dichloroethane             | < 0.034 | mg/kg | 0.034 | 0.11  | 1   | 8260B  |          | 3/9/2020 | CJR     | 1    |
| 1,1-Dichloroethene             | < 0.022 | mg/kg | 0.022 | 0.069 | 1   | 8260B  |          | 3/9/2020 | CJR     | 1    |
| cis-1,2-Dichloroethene         | < 0.032 | mg/kg | 0.032 | 0.1   | 1   | 8260B  |          | 3/9/2020 | CJR     | 1    |
| trans-1,2-Dichloroethene       | < 0.028 | mg/kg | 0.028 | 0.09  | 1   | 8260B  |          | 3/9/2020 | CJR     | 1    |
| 1,2-Dichloropropane            | < 0.035 | mg/kg | 0.035 | 0.11  | 1   | 8260B  |          | 3/9/2020 | CJR     | 1    |
| 1,3-Dichloropropane            | < 0.025 | mg/kg | 0.025 | 0.079 | 1   | 8260B  |          | 3/9/2020 | CJR     | 1    |
| trans-1,3-Dichloropropene      | < 0.022 | mg/kg | 0.022 | 0.068 | 1   | 8260B  |          | 3/9/2020 | CJR     | 1    |
| cis-1,3-Dichloropropene        | < 0.039 | mg/kg | 0.039 | 0.12  | 1   | 8260B  |          | 3/9/2020 | CJR     | 1    |
| Di-isopropyl ether             | < 0.01  | mg/kg | 0.01  | 0.032 | 1   | 8260B  |          | 3/9/2020 | CJR     | 1    |
| EDB (1,2-Dibromoethane)        | < 0.023 | mg/kg | 0.023 | 0.072 | 1   | 8260B  |          | 3/9/2020 | CJR     | 1    |
| Ethylbenzene                   | < 0.035 | mg/kg | 0.035 | 0.11  | 1   | 8260B  |          | 3/9/2020 | CJR     | 1    |
| Hexachlorobutadiene            | < 0.085 | mg/kg | 0.085 | 0.27  | 1   | 8260B  |          | 3/9/2020 | CJR     | 1    |
| Isopropylbenzene               | < 0.034 | mg/kg | 0.034 | 0.11  | 1   | 8260B  |          | 3/9/2020 | CJR     | 1    |
| p-Isopropyltoluene             | < 0.029 | mg/kg | 0.029 | 0.093 | 1   | 8260B  |          | 3/9/2020 | CJR     | 1    |
| Methylene chloride             | < 0.15  | mg/kg | 0.15  | 0.46  | 1   | 8260B  |          | 3/9/2020 | CJR     | 1    |
| Methyl tert-butyl ether (MTBE) | < 0.05  | mg/kg | 0.05  | 0.16  | 1   | 8260B  |          | 3/9/2020 | CJR     | 1    |
| Naphthalene                    | < 0.094 | mg/kg | 0.094 | 0.3   | 1   | 8260B  |          | 3/9/2020 | CJR     | 1    |
| n-Propylbenzene                | < 0.033 | mg/kg | 0.033 | 0.1   | 1   | 8260B  |          | 3/9/2020 | CJR     | 1    |
| 1,1,2,2-Tetrachloroethane      | < 0.028 | mg/kg | 0.028 | 0.88  | 1   | 8260B  |          | 3/9/2020 | CJR     | 1    |
| 1,1,1,2-Tetrachloroethane      | < 0.028 | mg/kg | 0.028 | 0.09  | 1   | 8260B  |          | 3/9/2020 | CJR     | 1    |

**Project Name** DB OAK  
**Project #** 170503

**Invoice #** E37560

**Lab Code** 5037560B  
**Sample ID** EAST IN PLACE  
**Sample Matrix** Soil  
**Sample Date** 2/25/2020

|                             | <b>Result</b> | <b>Unit</b> | <b>LOD</b> | <b>LOQ</b> | <b>Dil</b> | <b>Method</b> | <b>Ext Date</b> | <b>Run Date</b> | <b>Analyst</b> | <b>Code</b> |
|-----------------------------|---------------|-------------|------------|------------|------------|---------------|-----------------|-----------------|----------------|-------------|
| Tetrachloroethene           | 1.89          | mg/kg       | 0.032      | 0.1        | 1          | 8260B         |                 | 3/9/2020        | CJR            | 1           |
| Toluene                     | 0.38          | mg/kg       | 0.032      | 0.1        | 1          | 8260B         |                 | 3/9/2020        | CJR            | 1           |
| 1,2,4-Trichlorobenzene      | < 0.064       | mg/kg       | 0.064      | 0.2        | 1          | 8260B         |                 | 3/9/2020        | CJR            | 1           |
| 1,2,3-Trichlorobenzene      | < 0.066       | mg/kg       | 0.066      | 0.21       | 1          | 8260B         |                 | 3/9/2020        | CJR            | 1           |
| 1,1,1-Trichloroethane       | < 0.03        | mg/kg       | 0.03       | 0.96       | 1          | 8260B         |                 | 3/9/2020        | CJR            | 1           |
| 1,1,2-Trichloroethane       | < 0.033       | mg/kg       | 0.033      | 0.11       | 1          | 8260B         |                 | 3/9/2020        | CJR            | 1           |
| Trichloroethene (TCE)       | < 0.041       | mg/kg       | 0.041      | 0.13       | 1          | 8260B         |                 | 3/9/2020        | CJR            | 1           |
| Trichlorofluoromethane      | < 0.041       | mg/kg       | 0.041      | 0.13       | 1          | 8260B         |                 | 3/9/2020        | CJR            | 1           |
| 1,2,4-Trimethylbenzene      | < 0.025       | mg/kg       | 0.025      | 0.08       | 1          | 8260B         |                 | 3/9/2020        | CJR            | 1           |
| 1,3,5-Trimethylbenzene      | < 0.032       | mg/kg       | 0.032      | 0.1        | 1          | 8260B         |                 | 3/9/2020        | CJR            | 1           |
| Vinyl Chloride              | < 0.019       | mg/kg       | 0.019      | 0.062      | 1          | 8260B         |                 | 3/9/2020        | CJR            | 1           |
| m&p-Xylene                  | < 0.072       | mg/kg       | 0.072      | 0.23       | 1          | 8260B         |                 | 3/9/2020        | CJR            | 1           |
| o-Xylene                    | < 0.044       | mg/kg       | 0.044      | 0.14       | 1          | 8260B         |                 | 3/9/2020        | CJR            | 1           |
| SUR - Dibromofluoromethane  | 99            | Rec %       |            |            | 1          | 8260B         |                 | 3/9/2020        | CJR            | 1           |
| SUR - 1,2-Dichloroethane-d4 | 97            | Rec %       |            |            | 1          | 8260B         |                 | 3/9/2020        | CJR            | 1           |
| SUR - 4-Bromofluorobenzene  | 96            | Rec %       |            |            | 1          | 8260B         |                 | 3/9/2020        | CJR            | 1           |
| SUR - Toluene-d8            | 110           | Rec %       |            |            | 1          | 8260B         |                 | 3/9/2020        | CJR            | 1           |

**Project Name** DB OAK  
**Project #** 170503

**Invoice #** E37560

**Lab Code** 5037560C  
**Sample ID** MID IN PLACE  
**Sample Matrix** Soil  
**Sample Date** 2/25/2020

|                                | Result  | Unit  | LOD   | LOQ   | Dil | Method | Ext Date | Run Date  | Analyst | Code |
|--------------------------------|---------|-------|-------|-------|-----|--------|----------|-----------|---------|------|
| General                        |         |       |       |       |     |        |          |           |         |      |
| General                        |         |       |       |       |     |        |          |           |         |      |
| Solids Percent                 | 93.6    | %     |       |       | 1   | 5021   |          | 3/2/2020  | NJC     | 1    |
| Organic                        |         |       |       |       |     |        |          |           |         |      |
| VOC's                          |         |       |       |       |     |        |          |           |         |      |
| Benzene                        | < 0.03  | mg/kg | 0.03  | 0.096 | 1   | 8260B  |          | 3/10/2020 | CJR     | 1    |
| Bromobenzene                   | < 0.025 | mg/kg | 0.025 | 0.081 | 1   | 8260B  |          | 3/10/2020 | CJR     | 1    |
| Bromodichloromethane           | < 0.074 | mg/kg | 0.074 | 0.24  | 1   | 8260B  |          | 3/10/2020 | CJR     | 1    |
| Bromoform                      | < 0.029 | mg/kg | 0.029 | 0.092 | 1   | 8260B  |          | 3/10/2020 | CJR     | 1    |
| tert-Butylbenzene              | < 0.026 | mg/kg | 0.026 | 0.084 | 1   | 8260B  |          | 3/10/2020 | CJR     | 1    |
| sec-Butylbenzene               | < 0.033 | mg/kg | 0.033 | 0.1   | 1   | 8260B  |          | 3/10/2020 | CJR     | 1    |
| n-Butylbenzene                 | < 0.04  | mg/kg | 0.04  | 0.13  | 1   | 8260B  |          | 3/10/2020 | CJR     | 1    |
| Carbon Tetrachloride           | < 0.016 | mg/kg | 0.016 | 0.053 | 1   | 8260B  |          | 3/10/2020 | CJR     | 1    |
| Chlorobenzene                  | < 0.013 | mg/kg | 0.013 | 0.04  | 1   | 8260B  |          | 3/10/2020 | CJR     | 1    |
| Chloroethane                   | < 0.091 | mg/kg | 0.091 | 0.29  | 1   | 8260B  |          | 3/10/2020 | CJR     | 1    |
| Chloroform                     | < 0.035 | mg/kg | 0.035 | 0.11  | 1   | 8260B  |          | 3/10/2020 | CJR     | 1    |
| Chloromethane                  | < 0.076 | mg/kg | 0.076 | 0.24  | 1   | 8260B  |          | 3/10/2020 | CJR     | 1    |
| 2-Chlorotoluene                | < 0.015 | mg/kg | 0.015 | 0.047 | 1   | 8260B  |          | 3/10/2020 | CJR     | 1    |
| 4-Chlorotoluene                | < 0.018 | mg/kg | 0.018 | 0.057 | 1   | 8260B  |          | 3/10/2020 | CJR     | 1    |
| 1,2-Dibromo-3-chloropropane    | < 0.058 | mg/kg | 0.058 | 0.18  | 1   | 8260B  |          | 3/10/2020 | CJR     | 1    |
| Dibromochloromethane           | < 0.025 | mg/kg | 0.025 | 0.079 | 1   | 8260B  |          | 3/10/2020 | CJR     | 1    |
| 1,4-Dichlorobenzene            | < 0.037 | mg/kg | 0.037 | 0.12  | 1   | 8260B  |          | 3/10/2020 | CJR     | 1    |
| 1,3-Dichlorobenzene            | < 0.037 | mg/kg | 0.037 | 0.12  | 1   | 8260B  |          | 3/10/2020 | CJR     | 1    |
| 1,2-Dichlorobenzene            | < 0.028 | mg/kg | 0.028 | 0.088 | 1   | 8260B  |          | 3/10/2020 | CJR     | 1    |
| Dichlorodifluoromethane        | < 0.048 | mg/kg | 0.048 | 0.15  | 1   | 8260B  |          | 3/10/2020 | CJR     | 1    |
| 1,2-Dichloroethane             | < 0.038 | mg/kg | 0.038 | 0.12  | 1   | 8260B  |          | 3/10/2020 | CJR     | 1    |
| 1,1-Dichloroethane             | < 0.034 | mg/kg | 0.034 | 0.11  | 1   | 8260B  |          | 3/10/2020 | CJR     | 1    |
| 1,1-Dichloroethene             | < 0.022 | mg/kg | 0.022 | 0.069 | 1   | 8260B  |          | 3/10/2020 | CJR     | 1    |
| cis-1,2-Dichloroethene         | < 0.032 | mg/kg | 0.032 | 0.1   | 1   | 8260B  |          | 3/10/2020 | CJR     | 1    |
| trans-1,2-Dichloroethene       | < 0.028 | mg/kg | 0.028 | 0.09  | 1   | 8260B  |          | 3/10/2020 | CJR     | 1    |
| 1,2-Dichloropropane            | < 0.035 | mg/kg | 0.035 | 0.11  | 1   | 8260B  |          | 3/10/2020 | CJR     | 1    |
| 1,3-Dichloropropane            | < 0.025 | mg/kg | 0.025 | 0.079 | 1   | 8260B  |          | 3/10/2020 | CJR     | 1    |
| trans-1,3-Dichloropropene      | < 0.022 | mg/kg | 0.022 | 0.068 | 1   | 8260B  |          | 3/10/2020 | CJR     | 1    |
| cis-1,3-Dichloropropene        | < 0.039 | mg/kg | 0.039 | 0.12  | 1   | 8260B  |          | 3/10/2020 | CJR     | 1    |
| Di-isopropyl ether             | < 0.01  | mg/kg | 0.01  | 0.032 | 1   | 8260B  |          | 3/10/2020 | CJR     | 1    |
| EDB (1,2-Dibromoethane)        | < 0.023 | mg/kg | 0.023 | 0.072 | 1   | 8260B  |          | 3/10/2020 | CJR     | 1    |
| Ethylbenzene                   | < 0.035 | mg/kg | 0.035 | 0.11  | 1   | 8260B  |          | 3/10/2020 | CJR     | 1    |
| Hexachlorobutadiene            | < 0.085 | mg/kg | 0.085 | 0.27  | 1   | 8260B  |          | 3/10/2020 | CJR     | 1    |
| Isopropylbenzene               | < 0.034 | mg/kg | 0.034 | 0.11  | 1   | 8260B  |          | 3/10/2020 | CJR     | 1    |
| p-Isopropyltoluene             | < 0.029 | mg/kg | 0.029 | 0.093 | 1   | 8260B  |          | 3/10/2020 | CJR     | 1    |
| Methylene chloride             | < 0.15  | mg/kg | 0.15  | 0.46  | 1   | 8260B  |          | 3/10/2020 | CJR     | 1    |
| Methyl tert-butyl ether (MTBE) | < 0.05  | mg/kg | 0.05  | 0.16  | 1   | 8260B  |          | 3/10/2020 | CJR     | 1    |
| Naphthalene                    | < 0.094 | mg/kg | 0.094 | 0.3   | 1   | 8260B  |          | 3/10/2020 | CJR     | 1    |
| n-Propylbenzene                | < 0.033 | mg/kg | 0.033 | 0.1   | 1   | 8260B  |          | 3/10/2020 | CJR     | 1    |
| 1,1,2,2-Tetrachloroethane      | < 0.028 | mg/kg | 0.028 | 0.88  | 1   | 8260B  |          | 3/10/2020 | CJR     | 1    |
| 1,1,1,2-Tetrachloroethane      | < 0.028 | mg/kg | 0.028 | 0.09  | 1   | 8260B  |          | 3/10/2020 | CJR     | 1    |

**Project Name** DB OAK  
**Project #** 170503

**Invoice #** E37560

**Lab Code** 5037560C  
**Sample ID** MID IN PLACE  
**Sample Matrix** Soil  
**Sample Date** 2/25/2020

|                             | <b>Result</b> | <b>Unit</b> | <b>LOD</b> | <b>LOQ</b> | <b>Dil</b> | <b>Method</b> | <b>Ext Date</b> | <b>Run Date</b> | <b>Analyst</b> | <b>Code</b> |
|-----------------------------|---------------|-------------|------------|------------|------------|---------------|-----------------|-----------------|----------------|-------------|
| Tetrachloroethene           | 0.206         | mg/kg       | 0.032      | 0.1        | 1          | 8260B         |                 | 3/10/2020       | CJR            | 1           |
| Toluene                     | 0.109         | mg/kg       | 0.032      | 0.1        | 1          | 8260B         |                 | 3/10/2020       | CJR            | 1           |
| 1,2,4-Trichlorobenzene      | < 0.064       | mg/kg       | 0.064      | 0.2        | 1          | 8260B         |                 | 3/10/2020       | CJR            | 1           |
| 1,2,3-Trichlorobenzene      | < 0.066       | mg/kg       | 0.066      | 0.21       | 1          | 8260B         |                 | 3/10/2020       | CJR            | 1           |
| 1,1,1-Trichloroethane       | < 0.03        | mg/kg       | 0.03       | 0.96       | 1          | 8260B         |                 | 3/10/2020       | CJR            | 1           |
| 1,1,2-Trichloroethane       | < 0.033       | mg/kg       | 0.033      | 0.11       | 1          | 8260B         |                 | 3/10/2020       | CJR            | 1           |
| Trichloroethene (TCE)       | < 0.041       | mg/kg       | 0.041      | 0.13       | 1          | 8260B         |                 | 3/10/2020       | CJR            | 1           |
| Trichlorofluoromethane      | < 0.041       | mg/kg       | 0.041      | 0.13       | 1          | 8260B         |                 | 3/10/2020       | CJR            | 1           |
| 1,2,4-Trimethylbenzene      | < 0.025       | mg/kg       | 0.025      | 0.08       | 1          | 8260B         |                 | 3/10/2020       | CJR            | 1           |
| 1,3,5-Trimethylbenzene      | < 0.032       | mg/kg       | 0.032      | 0.1        | 1          | 8260B         |                 | 3/10/2020       | CJR            | 1           |
| Vinyl Chloride              | < 0.019       | mg/kg       | 0.019      | 0.062      | 1          | 8260B         |                 | 3/10/2020       | CJR            | 1           |
| m&p-Xylene                  | < 0.072       | mg/kg       | 0.072      | 0.23       | 1          | 8260B         |                 | 3/10/2020       | CJR            | 1           |
| o-Xylene                    | < 0.044       | mg/kg       | 0.044      | 0.14       | 1          | 8260B         |                 | 3/10/2020       | CJR            | 1           |
| SUR - Toluene-d8            | 105           | Rec %       |            |            | 1          | 8260B         |                 | 3/10/2020       | CJR            | 1           |
| SUR - 1,2-Dichloroethane-d4 | 99            | Rec %       |            |            | 1          | 8260B         |                 | 3/10/2020       | CJR            | 1           |
| SUR - 4-Bromofluorobenzene  | 94            | Rec %       |            |            | 1          | 8260B         |                 | 3/10/2020       | CJR            | 1           |
| SUR - Dibromofluoromethane  | 94            | Rec %       |            |            | 1          | 8260B         |                 | 3/10/2020       | CJR            | 1           |

Project Name DB OAK  
 Project # 170503

Invoice # E37560

Lab Code 5037560D  
 Sample ID WEST IN PLACE  
 Sample Matrix Soil  
 Sample Date 2/27/2020

|                                | Result  | Unit  | LOD   | LOQ   | Dil | Method | Ext Date | Run Date  | Analyst | Code |
|--------------------------------|---------|-------|-------|-------|-----|--------|----------|-----------|---------|------|
| General                        |         |       |       |       |     |        |          |           |         |      |
| General                        |         |       |       |       |     |        |          |           |         |      |
| Solids Percent                 | 93.4    | %     |       |       | 1   | 5021   |          | 3/2/2020  | NJC     | 1    |
| Organic                        |         |       |       |       |     |        |          |           |         |      |
| VOC's                          |         |       |       |       |     |        |          |           |         |      |
| Benzene                        | < 0.03  | mg/kg | 0.03  | 0.096 | 1   | 8260B  |          | 3/10/2020 | CJR     | 1    |
| Bromobenzene                   | < 0.025 | mg/kg | 0.025 | 0.081 | 1   | 8260B  |          | 3/10/2020 | CJR     | 1    |
| Bromodichloromethane           | < 0.074 | mg/kg | 0.074 | 0.24  | 1   | 8260B  |          | 3/10/2020 | CJR     | 1    |
| Bromoform                      | < 0.029 | mg/kg | 0.029 | 0.092 | 1   | 8260B  |          | 3/10/2020 | CJR     | 1    |
| tert-Butylbenzene              | < 0.026 | mg/kg | 0.026 | 0.084 | 1   | 8260B  |          | 3/10/2020 | CJR     | 1    |
| sec-Butylbenzene               | < 0.033 | mg/kg | 0.033 | 0.1   | 1   | 8260B  |          | 3/10/2020 | CJR     | 1    |
| n-Butylbenzene                 | < 0.04  | mg/kg | 0.04  | 0.13  | 1   | 8260B  |          | 3/10/2020 | CJR     | 1    |
| Carbon Tetrachloride           | < 0.016 | mg/kg | 0.016 | 0.053 | 1   | 8260B  |          | 3/10/2020 | CJR     | 1    |
| Chlorobenzene                  | < 0.013 | mg/kg | 0.013 | 0.04  | 1   | 8260B  |          | 3/10/2020 | CJR     | 1    |
| Chloroethane                   | < 0.091 | mg/kg | 0.091 | 0.29  | 1   | 8260B  |          | 3/10/2020 | CJR     | 1    |
| Chloroform                     | < 0.035 | mg/kg | 0.035 | 0.11  | 1   | 8260B  |          | 3/10/2020 | CJR     | 1    |
| Chloromethane                  | < 0.076 | mg/kg | 0.076 | 0.24  | 1   | 8260B  |          | 3/10/2020 | CJR     | 1    |
| 2-Chlorotoluene                | < 0.015 | mg/kg | 0.015 | 0.047 | 1   | 8260B  |          | 3/10/2020 | CJR     | 1    |
| 4-Chlorotoluene                | < 0.018 | mg/kg | 0.018 | 0.057 | 1   | 8260B  |          | 3/10/2020 | CJR     | 1    |
| 1,2-Dibromo-3-chloropropane    | < 0.058 | mg/kg | 0.058 | 0.18  | 1   | 8260B  |          | 3/10/2020 | CJR     | 1    |
| Dibromochloromethane           | < 0.025 | mg/kg | 0.025 | 0.079 | 1   | 8260B  |          | 3/10/2020 | CJR     | 1    |
| 1,4-Dichlorobenzene            | < 0.037 | mg/kg | 0.037 | 0.12  | 1   | 8260B  |          | 3/10/2020 | CJR     | 1    |
| 1,3-Dichlorobenzene            | < 0.037 | mg/kg | 0.037 | 0.12  | 1   | 8260B  |          | 3/10/2020 | CJR     | 1    |
| 1,2-Dichlorobenzene            | < 0.028 | mg/kg | 0.028 | 0.088 | 1   | 8260B  |          | 3/10/2020 | CJR     | 1    |
| Dichlorodifluoromethane        | < 0.048 | mg/kg | 0.048 | 0.15  | 1   | 8260B  |          | 3/10/2020 | CJR     | 1    |
| 1,2-Dichloroethane             | < 0.038 | mg/kg | 0.038 | 0.12  | 1   | 8260B  |          | 3/10/2020 | CJR     | 1    |
| 1,1-Dichloroethane             | < 0.034 | mg/kg | 0.034 | 0.11  | 1   | 8260B  |          | 3/10/2020 | CJR     | 1    |
| 1,1-Dichloroethene             | < 0.022 | mg/kg | 0.022 | 0.069 | 1   | 8260B  |          | 3/10/2020 | CJR     | 1    |
| cis-1,2-Dichloroethene         | < 0.032 | mg/kg | 0.032 | 0.1   | 1   | 8260B  |          | 3/10/2020 | CJR     | 1    |
| trans-1,2-Dichloroethene       | < 0.028 | mg/kg | 0.028 | 0.09  | 1   | 8260B  |          | 3/10/2020 | CJR     | 1    |
| 1,2-Dichloropropane            | < 0.035 | mg/kg | 0.035 | 0.11  | 1   | 8260B  |          | 3/10/2020 | CJR     | 1    |
| 1,3-Dichloropropane            | < 0.025 | mg/kg | 0.025 | 0.079 | 1   | 8260B  |          | 3/10/2020 | CJR     | 1    |
| trans-1,3-Dichloropropene      | < 0.022 | mg/kg | 0.022 | 0.068 | 1   | 8260B  |          | 3/10/2020 | CJR     | 1    |
| cis-1,3-Dichloropropene        | < 0.039 | mg/kg | 0.039 | 0.12  | 1   | 8260B  |          | 3/10/2020 | CJR     | 1    |
| Di-isopropyl ether             | < 0.01  | mg/kg | 0.01  | 0.032 | 1   | 8260B  |          | 3/10/2020 | CJR     | 1    |
| EDB (1,2-Dibromoethane)        | < 0.023 | mg/kg | 0.023 | 0.072 | 1   | 8260B  |          | 3/10/2020 | CJR     | 1    |
| Ethylbenzene                   | < 0.035 | mg/kg | 0.035 | 0.11  | 1   | 8260B  |          | 3/10/2020 | CJR     | 1    |
| Hexachlorobutadiene            | < 0.085 | mg/kg | 0.085 | 0.27  | 1   | 8260B  |          | 3/10/2020 | CJR     | 1    |
| Isopropylbenzene               | < 0.034 | mg/kg | 0.034 | 0.11  | 1   | 8260B  |          | 3/10/2020 | CJR     | 1    |
| p-Isopropyltoluene             | < 0.029 | mg/kg | 0.029 | 0.093 | 1   | 8260B  |          | 3/10/2020 | CJR     | 1    |
| Methylene chloride             | < 0.15  | mg/kg | 0.15  | 0.46  | 1   | 8260B  |          | 3/10/2020 | CJR     | 1    |
| Methyl tert-butyl ether (MTBE) | < 0.05  | mg/kg | 0.05  | 0.16  | 1   | 8260B  |          | 3/10/2020 | CJR     | 1    |
| Naphthalene                    | < 0.094 | mg/kg | 0.094 | 0.3   | 1   | 8260B  |          | 3/10/2020 | CJR     | 1    |
| n-Propylbenzene                | < 0.033 | mg/kg | 0.033 | 0.1   | 1   | 8260B  |          | 3/10/2020 | CJR     | 1    |
| 1,1,2,2-Tetrachloroethane      | < 0.028 | mg/kg | 0.028 | 0.88  | 1   | 8260B  |          | 3/10/2020 | CJR     | 1    |
| 1,1,1,2-Tetrachloroethane      | < 0.028 | mg/kg | 0.028 | 0.09  | 1   | 8260B  |          | 3/10/2020 | CJR     | 1    |

**Project Name** DB OAK  
**Project #** 170503

**Invoice #** E37560

**Lab Code** 5037560D  
**Sample ID** WEST IN PLACE  
**Sample Matrix** Soil  
**Sample Date** 2/27/2020

|                             | Result  | Unit  | LOD   | LOQ   | Dil | Method | Ext Date | Run Date  | Analyst | Code |
|-----------------------------|---------|-------|-------|-------|-----|--------|----------|-----------|---------|------|
| Tetrachloroethene           | < 0.032 | mg/kg | 0.032 | 0.1   | 1   | 8260B  |          | 3/10/2020 | CJR     | 1    |
| Toluene                     | 0.291   | mg/kg | 0.032 | 0.1   | 1   | 8260B  |          | 3/10/2020 | CJR     | 1    |
| 1,2,4-Trichlorobenzene      | < 0.064 | mg/kg | 0.064 | 0.2   | 1   | 8260B  |          | 3/10/2020 | CJR     | 1    |
| 1,2,3-Trichlorobenzene      | < 0.066 | mg/kg | 0.066 | 0.21  | 1   | 8260B  |          | 3/10/2020 | CJR     | 1    |
| 1,1,1-Trichloroethane       | < 0.03  | mg/kg | 0.03  | 0.96  | 1   | 8260B  |          | 3/10/2020 | CJR     | 1    |
| 1,1,2-Trichloroethane       | < 0.033 | mg/kg | 0.033 | 0.11  | 1   | 8260B  |          | 3/10/2020 | CJR     | 1    |
| Trichloroethene (TCE)       | < 0.041 | mg/kg | 0.041 | 0.13  | 1   | 8260B  |          | 3/10/2020 | CJR     | 1    |
| Trichlorofluoromethane      | < 0.041 | mg/kg | 0.041 | 0.13  | 1   | 8260B  |          | 3/10/2020 | CJR     | 1    |
| 1,2,4-Trimethylbenzene      | < 0.025 | mg/kg | 0.025 | 0.08  | 1   | 8260B  |          | 3/10/2020 | CJR     | 1    |
| 1,3,5-Trimethylbenzene      | < 0.032 | mg/kg | 0.032 | 0.1   | 1   | 8260B  |          | 3/10/2020 | CJR     | 1    |
| Vinyl Chloride              | < 0.019 | mg/kg | 0.019 | 0.062 | 1   | 8260B  |          | 3/10/2020 | CJR     | 1    |
| m&p-Xylene                  | < 0.072 | mg/kg | 0.072 | 0.23  | 1   | 8260B  |          | 3/10/2020 | CJR     | 1    |
| o-Xylene                    | < 0.044 | mg/kg | 0.044 | 0.14  | 1   | 8260B  |          | 3/10/2020 | CJR     | 1    |
| SUR - Toluene-d8            | 104     | Rec % |       |       | 1   | 8260B  |          | 3/10/2020 | CJR     | 1    |
| SUR - 1,2-Dichloroethane-d4 | 102     | Rec % |       |       | 1   | 8260B  |          | 3/10/2020 | CJR     | 1    |
| SUR - 4-Bromofluorobenzene  | 94      | Rec % |       |       | 1   | 8260B  |          | 3/10/2020 | CJR     | 1    |
| SUR - Dibromofluoromethane  | 101     | Rec % |       |       | 1   | 8260B  |          | 3/10/2020 | CJR     | 1    |

"J" Flag: Analyte detected between LOD and LOQ

LOD Limit of Detection

LOQ Limit of Quantitation

| <i>Code</i> | <i>Comment</i>               |
|-------------|------------------------------|
| 1           | Laboratory QC within limits. |

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

**Authorized Signature**







**Notice:** This voluntary form is intended as an aid for use by Generators and Responsible Parties in determining whether *contaminated soil or groundwater and wastes* encountered or generated during the remediation of contaminated sites in Wisconsin are or would be listed or characteristic hazardous wastes subject to regulation under ch. 291, Wis. Stats. and chs. NR 600 to 690, Wis. Adm. Code. There are no penalties for failure to provide information requested. Personally identifiable information collected will be used for program management. Wisconsin's Open Records law requires the Department to provide this information upon request [ss. 19.31 - 19.69, Wis. Stats.].

Listing determinations are often particularly difficult in the remedial context because the listings are generally identified by the sources of the hazardous wastes rather than the concentrations of various hazardous constituents. Therefore, analytical testing alone, without information on a waste's source, will not generally produce information that will conclusively indicate whether a given waste is a listed hazardous waste. Generators and Responsible Parties should use available site information such as material safety data sheets (MSDS's), manifests, vouchers, bills of lading, sales and inventory records, accident reports, spill reports, inspection reports, and other available information. It may also be necessary to conduct interviews of current or former personnel who would have knowledge of the processes and hazardous materials used including waste handling or past spills in an effort to ascertain the sources of wastes or contaminants.

Where a person makes a good faith effort to determine if a material is a listed hazardous waste but cannot make such a determination because documentation regarding a source of contamination, contaminant, or waste is unavailable or inconclusive, EPA has stated that one may assume the source, contaminant or waste is not listed hazardous waste and, therefore, provided the material in question does not exhibit a characteristic of hazardous waste, RCRA requirements do not apply.

**Generator Information**

|  |   |
|--|---|
| Generator's Name<br><b>Gardner Denver</b>              | Preparer's Name<br><b>Friess Environmental Consulting, Inc.</b> |
| Address<br><b>222 E. Erie Street</b>                   | Address<br><b>6635 N. Sidney Place</b>                          |
| City, State and ZIP Code<br><b>Milwaukee, WI 53202</b> | City, State and ZIP Code<br><b>Milwaukee, WI 53209</b>          |
| Telephone Number<br><b>(414) 212-4700</b>              | Telephone Number<br><b>(414) 228-9815</b>                       |

**Site Information**

|   |   |
|---|---|
| Site Name<br><b>D.B. Oak</b>  | Other name(s) site is known by<br><b>Former Thomas Industries</b> |
| Address<br><b>700-710 Oak Street</b>  | County<br><b>Jefferson</b>  |
| Located in the City, Town or Village ZIP Code<br><b>Fort Atkinson, WI 53711</b> |   |

**Hazardous Waste Determination Information Reviewed**

**Listed Hazardous Waste Determination**

|  |  |
|--|--|
| Manifests reviewed<br><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> None Found <input checked="" type="checkbox"/> None Available          | Vouchers reviewed<br><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> None Found <input checked="" type="checkbox"/> None Available   |
| Bills of lading reviewed<br><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> None Found <input checked="" type="checkbox"/> None Available    | Sales and inventory records reviewed<br><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> None Found <input checked="" type="checkbox"/> None Available  |
| Material safety data sheets<br><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> None Found <input checked="" type="checkbox"/> None Available | Accident reports reviewed<br><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> None Found <input checked="" type="checkbox"/> None Available   |
| Spill reports reviewed<br><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> None Found <input checked="" type="checkbox"/> None Available      | Inspection reports reviewed<br><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> None Found <input checked="" type="checkbox"/> None Available   |
| DNR's case files reviewed<br><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> None Found <input checked="" type="checkbox"/> None Available   | Interviewed current and/or former employees who are likely to know about the use and/or disposal of the chemical or waste of concern (not just managers).<br><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> None Found <input checked="" type="checkbox"/> None Available |

**Remediation Site  
Hazardous Waste Determination**

Form 4430-019 (R 4/03)

Page 2 of 2

**Hazardous Waste Determination Information Reviewed (continued)**

Other information considered (provide description)

Yes

No

None Found

None Available

Based on the results of initial pressure field extension (PFE) testing conducted at the site to evaluate a vapor mitigation system (VMS) install, it was determined that the most effective way to mitigate potential vapor intrusion risks from sub-slab vapors would be to install perforated pipe in long horizontal trenches with large custom built blowers to handle the high volumes and/or pressures needed. Up to four trenches may be necessary to obtain proper communication throughout the sub-slab environment.

In order to install the piping, it will be necessary to excavate soils within the trenches and dispose of the material in accordance with applicable regulations. Soil analytical test results indicate that the materials excavated from the trenches do not contain levels of chlorinated volatile organic compounds (CVOCs) at levels greater than 20 times their respective TCLP limits. As such, the soils would not be considered a hazardous waste and can be disposed of as a solid waste under the contained out rule.

**Characteristic Hazardous Waste Determination**

Identified location(s)

Soil samples from the east, mid, and west portions of the north and south trenches installed within the central portion of the building were collected and analyzed for VOCs.

Testing results

VOCs detected in the soil samples are all below the WDNR's health based contained out values and the results are summarized on the attached table.

**Certification**

I certify that the information documented above in the "Information reviewed to make a hazardous waste determination" section was developed and used as part of a good faith effort to make a hazardous waste determination. Reasonable diligence was used in collecting the information, evaluating the information, and using the compiled information. I certify that this document is true and correct to the best of my knowledge, and that I have authority to make this certification.

Name and Title

Trenton J. Ott - Project Manager

Signature



Date

03/24/2020