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

Development at Historic Fill Site or Licensed Landfill Exemption Application

Form 4400-226 (R 05/16)

Notice: Use of this form is required by the DNR for any application to develop at a historic fill site or licensed landfill pursuant to secs. NR 506.085 and NR 500.08(4), Wis. Adm. Code. The Department will not consider your application unless you provide complete information requested. Personally identifiable information collected will be used to process your application and will also be accessible by request under Wisconsin's Open Records law [ss.19.31 - 19.39, Wis. Stats.]

Instructions: See *Development at Historic Fill Sites and Licensed Landfills: What you need to know* (PUB-RR-683, November 2013) for detailed instructions.

- All Exemption Application materials should be sent to the region where the site is located, as listed on page 6.
- Include $700 fee payment with this application. If the site is a licensed landfill and the Waste and Materials Management program is doing the review, submit no fee now. You will be sent an invoice upon receipt of this application.
- Determine the appropriate exemption type for the site and check appropriate box below.
- Provide complete information requested for each type of exemption. Include the following attachments:
  Required: Summary of Existing and Potential Impacts described in Section V as an attachment, under the seal of a professional engineer or geologist registered to practice in Wisconsin.

  Optional: Site Visit Summary Comments (Section IX) including any photos, sketches or site visit notes.

Exemption Type

☐ **Remediation and Redevelopment Program NR 700 Rule Series Process Exemption:** Site with remedial actions conducted in accordance with NR 700 series
Required: Sections I - VI ***Optional:*** Sections VII - X

☒ **Case-by-Case Evaluation:** Sites with anticipated environmental impacts or wastes of special concerns
Required: Sections I - VI ***Optional:*** Sections VII - X

☐ **Expedited Exemption:** Site with no expected environmental impact
Required: Sections I - VI **and** Form 4400-226A Expedited Exemption Application ***Optional:*** Sections VII - X

I. Applicant Information

Owner - Last Name	First	MI	Phone Number (include area code)
Tresp	Dan		(920) 457-4441

Contact Name (if different)
Kohler Co

Street Address	City	State	ZIP Code
444 Highland Drive	Kohler	WI	53044

Developer - Last Name	First	MI	Phone Number (include area code)

Street Address	City	State	ZIP Code

II. Site Name and Location

Site Name: Kohler Co Crane Yard

Location / Address: 444 Highland Drive

Is the site known by another name(s)? ○ Yes ◉ No ○ Unknown
If yes, provide name: _____

○ City ○ Town ◉ Village of Kohler

Does the site have a license number? ○ Yes ○ No ○ Unknown
If yes, License Number: _____

State	ZIP Code	County
WI	53044	Sheboygan

A. Attach a map with site location and limits of fill/waste disposal area.

B. Global Positioning System Coordinates

Latitude	DEG	MIN	SEC		Longitude	DEG	MIN	SEC	
	43	44	27.0000	N		87	46	34.0000	W

Describe method for collecting GPS Coordinates
Lat/Long (DMS) were obtained from the RR Sites Map website.

Program Lead, Fee Status and Regulatory ID Numbers ***(This area for DNR use only)***

○ **Waste Management Bureau**
○ **Remediation and Redevelopment Bureau - Exemption is part of remedy under NR 700 program**
○ Fee already paid for review of remedial design report.
○ Review of remedial design report not requested and payment is attached.

☐ Payment Attached
Amount $

Hazardous Waste Facility License ID #:(5 digits)	DNR FID #: (9 digits)	USEPA ID #:(used for both RCRA & CERCLIS #s) (WI+Alpha+9 digits)

Region	Project Manager	Telephone Number

III. Site Ownership History

Previous Owner - Last Name	First	MI	Telephone Number
Kohler Co -- Same as current owner			

Street Address	City	State	ZIP Code
Same as current owner			

Responsible Municipal / Private Operator - Last Name (if applicable)	First	MI	Telephone Number

Street Address	City	State	ZIP Code

IV. Evaluation of Existing and Potential Impacts. See Development at Historic Fill Sites and Licensed Landfill: Guidance for Investigation and Development at Historic Fill Sites and Licensed Landfill: Potential Problems and Considerations.

A. Analytical data for the following media have been collected and/or examined before completing this application:

1. Groundwater: ○ Yes ○ No
2. Soil: ◉ Yes ○ No
3. Surface water / sediment: ○ Yes ○ No
4. Air: ○ Yes ○ No
5. Methane or other explosive gases: ○ Yes ○ No

B. Based on known or suspected sources and wastes, their physical characteristics, containment and geologic environment, do you suspect a release of pollutants to the environment?

○ Yes: ☐ Groundwater ☐ Soil ☐ Surface Water / Sediment ☐ Methane or Other Explosive Gases
◉ No

C. If there is NOT a likelihood of a release of pollutants or evidence of a release, would the impact of the proposed development be likely to cause a release to the environment?

○ Yes: **If yes, be sure to summarize actions to be taken to prevent adverse environmental impacts in V. Part C below.**
◉ No

V. Summary of Existing and Potential Impacts. See Development at Historic Fill Sites and Licensed Landfill: Guidance for Investigation and Development at Historic Fill Sites and Licensed Landfill: Potential Problems and Considerations.

Describe the following in an attached narrative under the signature of a qualified professional. Organize, label and package as listed below.

A. Existing Site Conditions

1. existing site conditions including waste types,
2. potential for impacts, and
3. evaluation of existing impacts.

B. Proposed Development Summary. Include explanation for overall site decision.

C. Summary of actions to be taken and engineering controls that will prevent or minimize adverse environmental impacts and potential threats to human health and welfare, including worker safety.

VI. Certification of Application Information

I certify that information in this application and all its attachments is true and correct and in conformity with applicable Wis. statutes.

Print / Type Name of Applicant

Dan Tresp

Applicant Signature Dan Tresp Date Signed 4/10/2020

Sections VII - IX are optional for all Applicants.

VII. Current and Historic Type of Waste Disposal Site (Check all that apply)

- [ ] Licensed Landfill
- [ ] Non-approved {See s.289.01(3)}, Wis Stats.
- [ ] Approved
- [ ] One-time Disposal
- [ ] Construction / Demolition
- [x] Historic Fill Site

Liner

- [x] Unlined
- [ ] Lined
- [ ] Composite Liner
- [ ] Other Liner (Describe): _____
- [ ] Clay Liner
- [ ] Unengineered

Total Landfill Volume

- (●) < 50,000 yd ³
- ( ) 50,000-500,000 yd
- ( ) > 500,000 yd ³

Does the landfill have a closure plan? ( ) Yes (●) No ( ) Unknown

Does the landfill have a groundwater monitoring plan? ( ) Yes (●) No ( ) Unknown

Have groundwater monitoring wells been installed? ( ) Yes (●) No ( ) Unknown

Was a cover installed? (●) Yes: ( ) No **If no, go to Past Land Uses.**

- [ ] Composite cap
- [ ] Layered soil cap with clay barrier
- [ ] Clay cap
- [ ] Soil cap - not recompacted clay
- [x] Other cover
- [ ] Unknown

What is the thickness of the cover? (●) < 6 in ( ) 6-12 in ( ) 12-24 in ( ) > 24 in ( ) Unknown

Past Land Uses. (Check all that apply)

- [ ] Agricultural co-op
- [ ] Brush pile
- [ ] Bulk plant
- [ ] Coal gas manufacturer
- [ ] Deer pit
- [ ] Dry cleaner
- [ ] Electroplater
- [ ] Lagoon
- [x] Manufacturing Type: Iron foundry
- [ ] Old burn pit
- [ ] Pipeline
- [ ] RCRA generator
- [ ] Salvage yard
- [ ] Service Station
- [ ] Tannery
- [ ] Unknown
- [ ] Other: _____

Date(s) of Site Operation

From: 01/01/1920 To: 04/10/2020 No. of Years: 100 [ ] Unknown

VIII. Waste Information & Geologic Environment. See Development at Historic Fill Sites and Licensed Landfills: Guidance for Investigation

A. Known or Suspected Sources/Wastes. (Check all that apply)

- [ ] Abandoned containers
- [ ] Above ground pipeline or tank
- [ ] Animal carcasses
- [ ] Buried drums
- [ ] Burning of materials
- [x] Foundry sand
- [ ] Industrial accident
- [ ] Known or suspected hazardous materials
- [ ] Municipal waste
- [ ] Paper mill sludge
- [ ] Transformer
- [ ] Trees/brush
- [ ] Surface spills
- [ ] Fly ash
- [ ] Demolition/construction waste
- [ ] Surface impoundment/lagoons
- [ ] Underground pipeline or tank
- [ ] Exempted fill [NR 500.08(1) and (2)]
- [ ] Unknown
- [x] Other: cast iron byproducts

B. Physical Characteristics of Sources/Wastes

( ) Liquid (●) Solid ( ) Liquid & Solid ( ) Unknown

VIII. Waste Information & Geologic Environment *(continued)*

C. Waste Containment

◯ Liner ◯ Unknown ◉ Not applicable

☐ Engineered cover
◯ Maintained ◯ Not maintained

☐ Functioning leachate collection & removal system
☐ Functioning & maintained run-off management system
☐ Functioning groundwater monitoring system

D. Soil Type: Estimate distances or determinations based on regional or site specific information.

◯ Regional ◉ Site specific

Clay, silt or other fine grained soils present? (lacustrine, tills, etc.) ◉ Yes ◯ No

At surface? ◯ Yes ◉ No At depth? ◉ Yes ◯ No 10 feet

Sand & gravel, coarse grained soils present? ◉ Yes ◯ No

At surface? ◉ Yes ◯ No At depth? ◯ Yes ◯ No _____ feet

E. Depth to Groundwater

◯ Regional ◉ Site specific 20 feet

F. Direction of Groundwater Flow

◯ Regional ◉ Site specific Southerly direction

G. Depth to Bedrock

◉ Regional ◯ Site specific 100 FT direction

H. Bedrock Type

◉ Regional ◯ Site specific ☐ Sandstone ☒ Limestone/Dolomite ☐ Metamorphic/Igneous

IX. Site Visit

Conduct a site visit to complete site screening and determine general site conditions, on-site activities and adjacent land use encroachment issues. As appropriate to document the site, take photos, sketch the site and prepare a Site Visit Report.

On-site visit conducted? ◉ Yes ◯ No

General site conditions: Document any observed releases and note whether or not you were able to walk the site. Examples of things to be aware of include the following:

- leachate seeps or evidence of seeps such as stained soil/vegetation
- stressed vegetation as a sign of gas migration to the surface or of leachate seeps;
- quality and coverage of vegetation on the cap;
- odors which may indicate gas migration to the atmosphere;
- erosion of the cap;
- maintenance of positive drainage over the capped area;
- visual desiccation cracks in the cap.

Attach the following to your application:

☒ Photographs, regular or digital ☒ Site sketch ☐ Site Visit Report

Name(s) of Person(s) Conducting Site Visit	Date of Site Visit
Dan Tresp	

IX. Site Visit *(continued)*

A. Adjacent Land Uses. Indicate all directions. (Check all that apply)

	N	S	E	W	NE	NW	SE	SW
☐ Agricultural	☐	☐	☐	☐	☐	☐	☐	☐
☒ Industrial	☒	☒	☒	☒	☒	☒	☒	☒
☐ Recreational	☐	☐	☐	☐	☐	☐	☐	☐
☐ Residential	☐	☐	☐	☐	☐	☐	☐	☐
☐ Undeveloped	☐	☐	☐	☐	☐	☐	☐	☐
☐ Commercial	☐	☐	☐	☐	☐	☐	☐	☐
☐ Other:	☐	☐	☐	☐	☐	☐	☐	☐

B. Potential Groundwater Receptors. Estimate distances. (1 mile = 5,280 ft)

Distance to and direction of nearest municipal well: _____ feet ☒ > ½ mile from the waste north direction

Distance to and direction of nearest other-than-municipal well: _____ feet ☐ > ½ mile from the waste _____ direction

Distance to and direction of nearest non-community well: _____ feet ☐ > ½ mile from the waste _____ direction

Distance to and direction of nearest private well: 1125 feet ☐ > ½ mile from the waste _____ direction

Distance to and direction of nearest private well: _____ feet ☐ > ½ mile from the waste _____ direction

C. Potential For Gas Migration

0 No. of homes within 300 feet of waste (gas migration potential)

0 No. of homes between 300 & 1,000 ft to waste (gas migration potential)

Distance to and direction of nearest building: 0 feet ☐ > ½ mile from the waste _____ direction

Type of building: ☒ On-site building ☐ Municipal ☐ Residential ☐ Commercial ☐ Industrial ☐ Unknown

D. Potential Surface Water Receptors. Estimate distances.

○ Creek _____ feet ○ Drainage ditch: _____ feet ○ Intermittent stream: _____ feet

◉ River 1750 feet ○ Lake _____ feet ○ Wetland: _____ feet

E. Based on the site visit, did you visually observe...

1. a release to a surface water body? ○ Yes ◉ No ○ Unknown
2. a leachate seep? ○ Yes ◉ No ○ Unknown
3. a release to soils? ○ Yes ◉ No ○ Unknown

X. Comments: Use this section to provide comments on any aspect of the site visit. Attach any information or explanations labeled with the appropriate section number to which the material applies.

The portion of the Kohler Co. property underlain by Crane Yard historic fill (i.e., the site) is located within a large industrial property with a substantial buffer to off site properties: 0.1 mile to the west to commercial properties, 1 mile to the north and east to residential properties, and 0.35 miles to the south to residential properties. As shown on attached Figure 2, the reconstructed crane yard includes a significant new area of pavement beneath the crane's operational footprint.

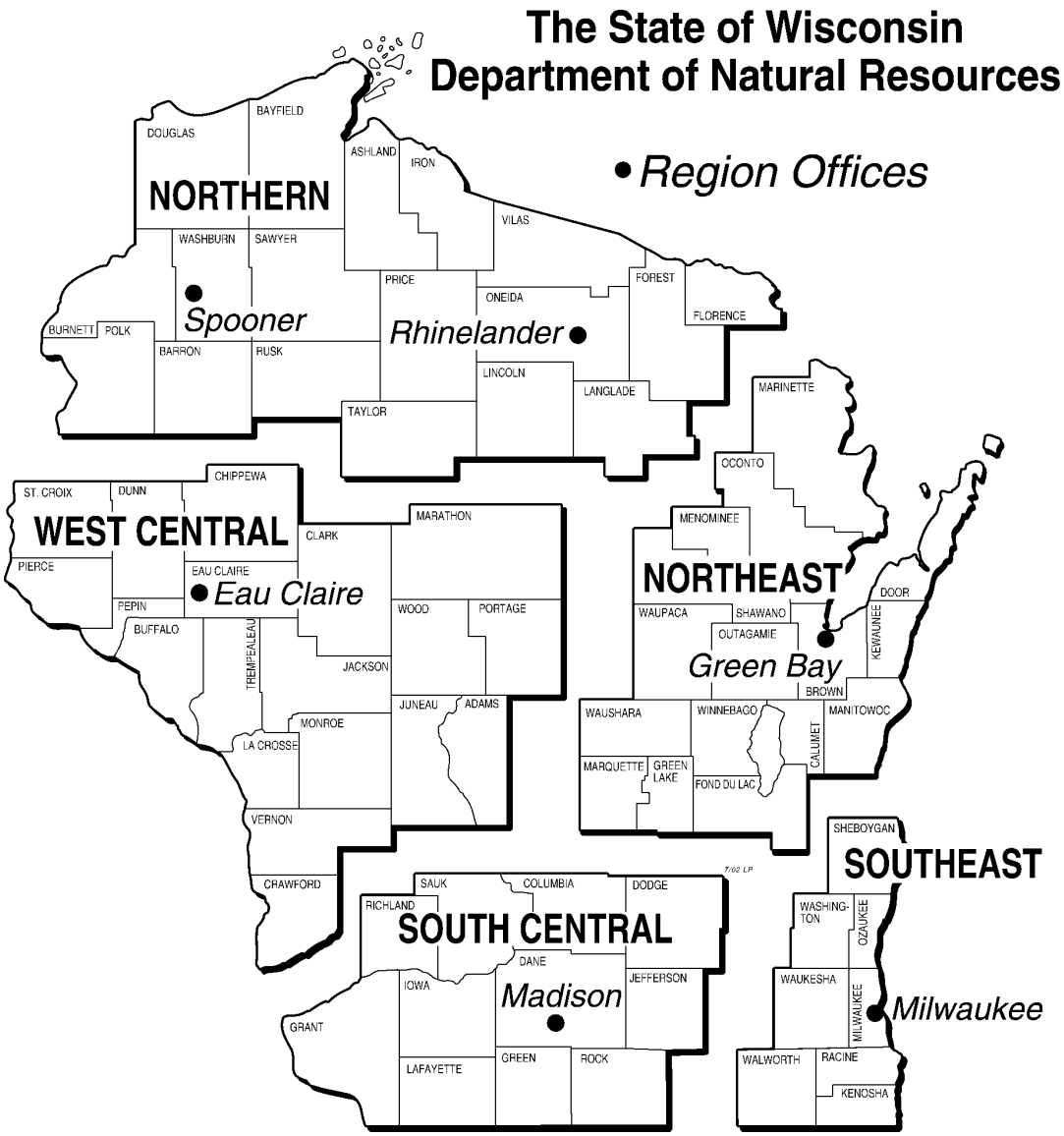
Region Map

NORTHERN REGION
Remediation & Redevelopment
Team Supervisor
Department of Natural Resources
107 Sutliff Avenue
Rhinelander, WI 54501
(715) 365-8976
OR
Regional Waste Program Manager
Department of Natural Resources
107 Sutliff Avenue
Rhinelander WI 54501
(715) 365-8946

NORTHEAST REGION
Remediation & Redevelopment
Team Supervisor
Department of Natural Resources
2984 Shawano Avenue
Green Bay, WI 54313-6727
(920) 662-5160
OR
Regional Waste Program Manager
Department of Natural Resources
2984 Shawano Avenue
Green Bay, WI 54313-6727
(920) 662-5120

SOUTHEAST REGION
Remediation & Redevelopment
Team Supervisor
Department of Natural Resources
2300 N. Martin Luther King Drive
Milwaukee, WI 53212
(414) 263-8561 or (414) 263-8714
OR
Regional Waste Program Manager
Department of Natural Resources
2300 N. Martin Luther King Drive
Milwaukee, WI 53212
(414) 263-8694 or (414) 263-8697

WEST CENTRAL REGION
Remediation & Redevelopment
Team Supervisor
Department of Natural Resources
1300 West Clairemont Avenue
Eau Claire, WI 54701
(715) 839-3710
OR
Regional Waste Program Manager
Department of Natural Resources
1300 West Clairemont Avenue
Eau Claire, WI 54701
(715) 839-3708



SOUTH CENTRAL REGION
Remediation & Redevelopment
Team Supervisor
Department of Natural Resources
3911 Fish Hatchery Road
Fitchburg, WI 53711
(608) 275-3241

OR Regional Waste Program Manager
Department of Natural Resources
3911 Fish Hatchery Road
Fitchburg, WI 53711
(608) 275-3466

V. Summary of Existing and Potential Impacts

On behalf of Kohler Co. (Kohler), GEI Consultants, Inc. (GEI) emailed data on the subsurface assessment and historic fill characterization along with information on the crane yard reconstruction to Mr. Richard Joslin (WDNR) on September 5, 2019. Mr. Joslin contacted GEI and Kohler after reviewing this submittal and confirmed that available information adequately characterized the nature and extent of the historic fill and that the surface features in the existing and reconstructed areas of the crane yard would protect against potential exposure to historic fill. We recognized that it would not be necessary to rely upon the surface cover of the crane yard area, consisting of primarily pavement, to serve as a formal engineering control, because of the relatively low metals concentrations in the underlying historic fill at this industrial site. Mr. Joslin requested that a Development at Historic Fill Site or Licensed Landfill Exemption Application (Application) be submitted with the existing data to facilitate managing/tracking through the WDNR's Application approval process.

This attachment to the Application for the Kohler crane yard area provides additional information for Section V. of the Application consistent with information previously received and reviewed by the WDNR. Kohler has completed reconstruction of the crane yard area (Figure 1) including installation of a new overhead bridge crane and concrete pavement. Roof and facia are scheduled for installation this year. Historical fill consisting of foundry sand, cast iron byproducts and slag, refractory brick and metal fragments was encountered during reconstruction of the crane yard. Historical fill disturbed for the new construction was properly tested and classified as solid waste for off-site disposal. The historical fill in the crane yard area is contiguous with fill documented in the parking lot to the east including the approved industrial byproducts (pottery cull, green sand, slag, resin bonded sand) beneficially reused as confined geotechnical fill under s. NR 538.10(5)(b), Wisconsin Administrative Code, and historical fill found to contain iron byproducts with pockets of brass machining and die casting byproducts in the northwestern portion of the parking lot. WDNR review of the parking lot historical fill data was provided in a No Additional Action Required letter dated January 10, 2018 (WDNR BRRTS # 02-06-578171).

The purpose of this application attachment is to summarize relevant data on the historical fill in the crane yard area covering a description of the historic fill characteristics and location on the property, and analytical data for the historic fill, consistent with previous communications with the WDNR. We also present our conclusion that sufficient characterization of the historical fill has been completed and metals in the remaining fill do not represent a threat for direct contact exposure and have not migrated such that surrounding/underlying native soil has been adversely impacted.

Crane Yard Historical Fill Description

- Historic fill is composed of non-soil materials (in descending proportion): cast iron foundry sand, foundry slag, refractory brick, and metal fragments.

- Thickness of the historic fill ranges up to 9 feet in pier foundations in the southeast portion of the crane yard and between approximately 1.5 to 4 feet elsewhere in the crane yard area. Generalized fill descriptions are also presented on the attached geotechnical boring logs.

- Observations of exposed subgrade during construction and in test pits and a utility tunnel (to the west), and review of geotechnical boring logs and analytical data (see below) were used to

define the lateral extent of historic fill shown on the attached Figure 2. The extent of historical fill was further defined based on data from UST excavations for two closed LUST cases also depicted on this figure.

- Historical fill occupies approximately 240,000 square feet and its volume is estimated to range from 25,000 to 35,000 cyd.

- The attached photographic log provides images of the historic fill, test pit sample locations, and the crane yard during and following construction completed in summer 2019.

Analytical Data

- As presented on attached Table 1 and in the attached lab reports, the total lead concentrations in the historic fill varied from 43.3 to 58.0 mg/kg. Results were substantially below the nonindustrial and industrial direct contact RCLs of 400 and 800 mg/kg, respectively. One lead result exceeded the background threshold value (BTV) for lead of 52 mg/kg. Total cadmium (up to 1.07 mg/kg) and copper (up to 145 mg/kg) exceeded BTVs in one and two historical fill samples, respectively, but were also two or more orders of magnitude less than direct contact RCLs.

- Samples collected from native soil below or surrounding the historic fill zone contained lead ranging from 2.33 to 11.4 mg/kg, substantially below the BTV for lead of 52 mg/kg. Similarly, cadmium and copper were also below BTVs in a native soil sample collected beneath the crane yard (Sample CY-2).

- Toxicity characteristic leaching procedure (TCLP) data summarized on Table 2 and as presented in the attached lab reports was used to classify historic fill for disposal as a solid waste. The majority of historic fill disturbed for the crane yard project was generated for installation of pier foundations for the bridge crane and the new concrete pavement section. The lab reports also identify subsamples that were composited for waste characterization.

Conclusions

- Historic fill is present west of the parking lot and primarily beneath the improved crane yard, including in the area shown on Figure 2 where new concrete pavement was installed. Historic fill is also inferred to be present beneath the east-west paved access road.

- Historic fill is located near the center of the Kohler Co. industrial property and consists primarily of non-soil material: foundry sand, cast iron byproducts and slag, refractory brick and metal fragments.

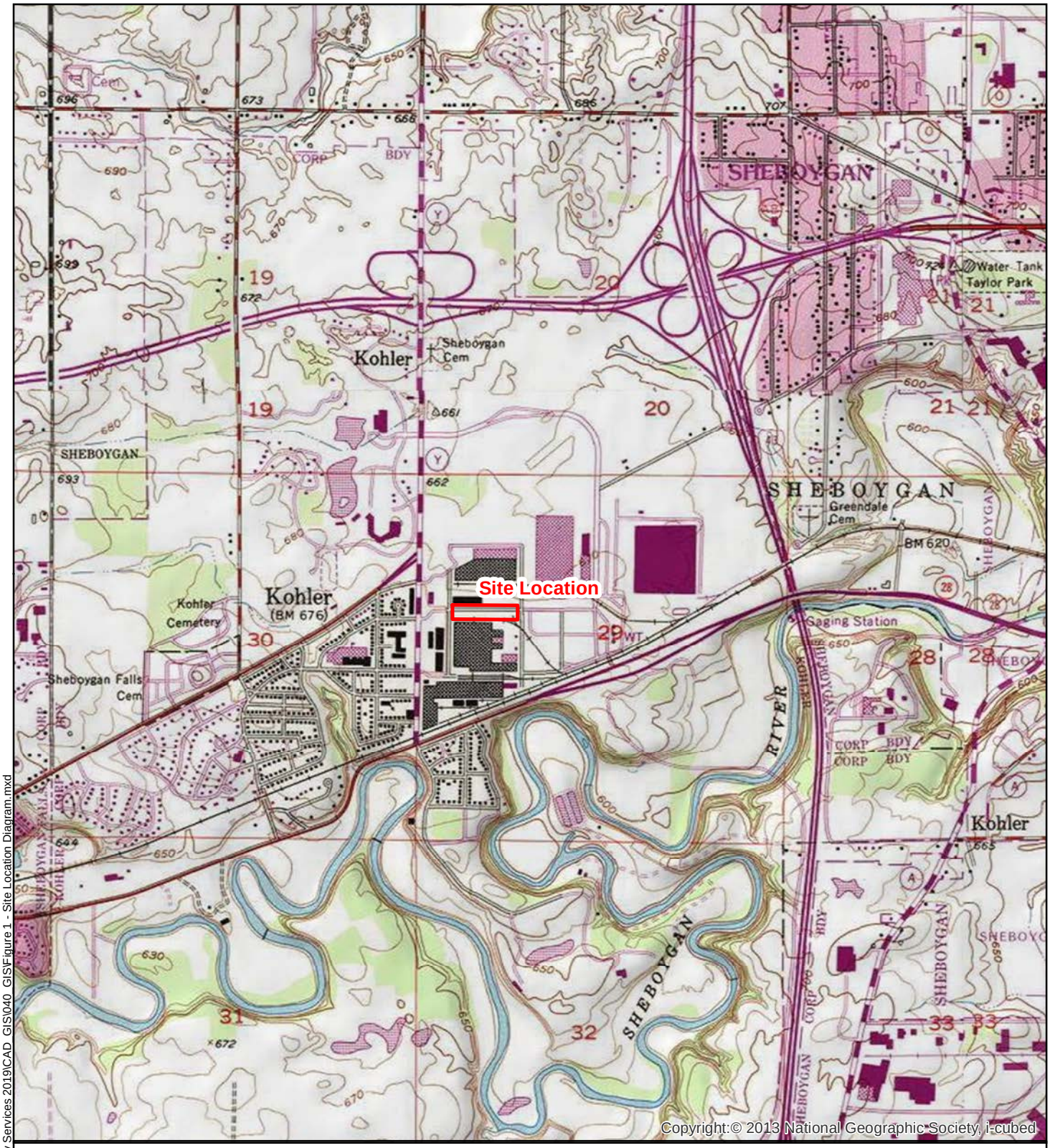
- Fill testing data indicate that lead and other metals (cadmium and copper) are present at concentrations that vary below and above BTVs but which do not represent a threat for direct contact exposure. Soil testing data also does not indicate that lead or other metals have migrated such that surrounding/underlying native soil has been adversely impacted.

- The Kohler Co. property is subject to several deed restrictions/affidavits/continuing obligations, including the early 2018 deed affidavit for the NR 538 industrial byproduct placement in the parking lot. The net result of these continuing obligations and owner knowledge of subsurface conditions is that any excavation that occurs on the mill property will be reviewed by qualified environmental staff and materials tested as needed for appropriate handling and disposal.

Based on the technical considerations presented above, we recommend that the historic fill be managed/tracked through the WDNR's approval of the Application.

Attachments

- Figure 1 – Site Location Diagram
- Figure 2 – Approximate Extent of Foundry Sand/Byproducts Fill
- Table 1 – Soil Analytical Summary
- Table 2 – TCLP Metals Analytical Summary
- Geotechnical Boring Logs
- Laboratory Analytical Reports
- Photographic Log



Notes:

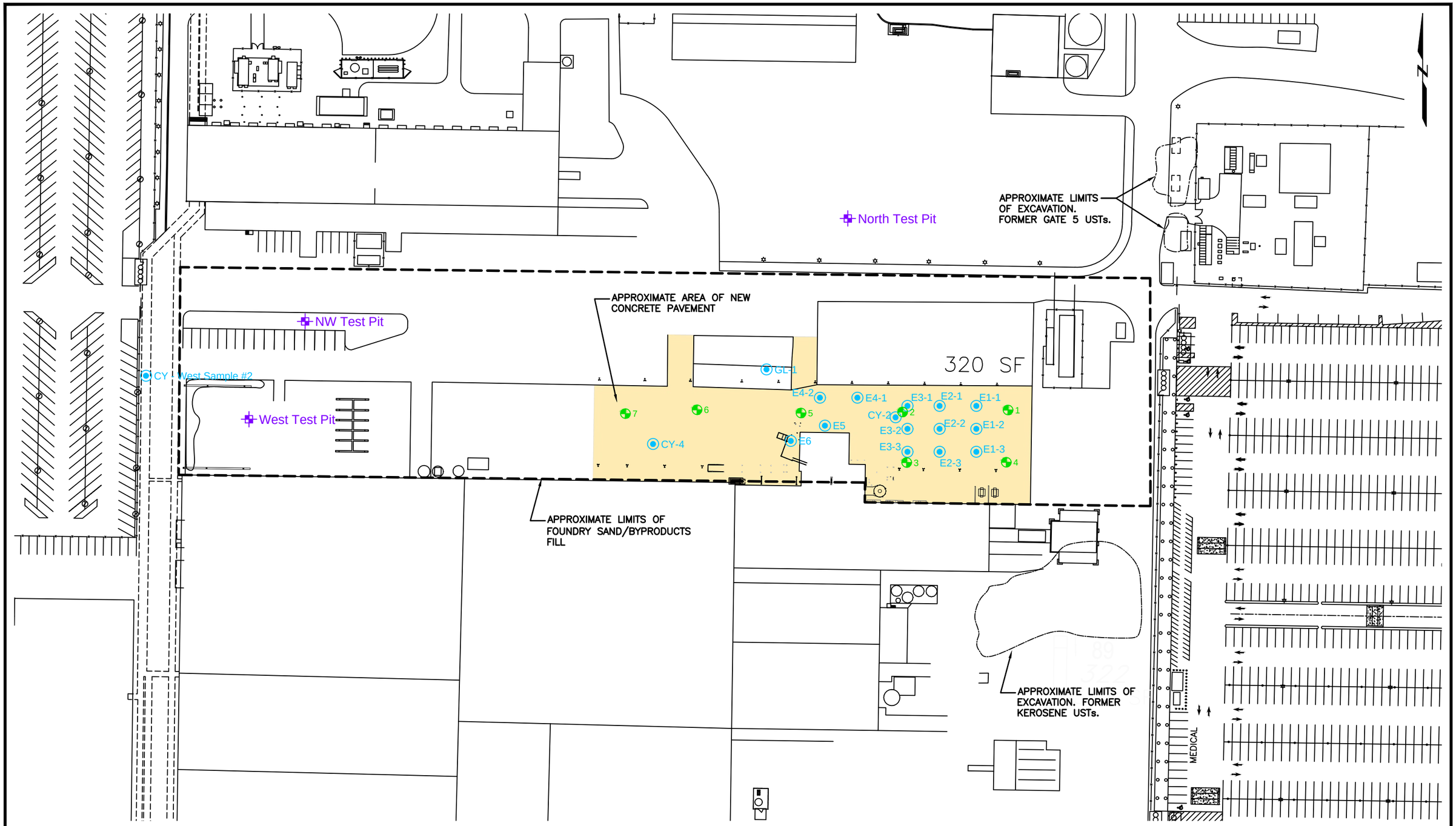
1. BASED ON A 2013 USGS MAP

0 1,000 2,000 4,000 Feet

Scale: 1 inch = 2,000 feet

KOHLER CO. CRANE YARD FOUNDRY SAND/BYPRODUCTS FILL	GEI Consultants	SITE LOCATION DIAGRAM
Kohler, Wisconsin	PROJECT 1902722	AUGUST 2019 FIGURE 1

K:\Kohler Co\1902722_Kohler Crane Yard Env Services 2019\CAD_GIS\040_GIS\Figure 1 - Site Location Diagram.mxd



3 GEOTECHNICAL BORING

E5 SOIL SAMPLE

TEST PIT

APPROXIMATE LIMITS OF FOUNDRY SAND/BYPRODUCTS FILL

APPROXIMATE AREA OF CONCRETE PAVEMENT FOR UPGRADED CRANE YARD

0 100 200

SCALE: 1" = 100'

Crane Yard	GEI Consultants	APPROXIMATE EXTENT OF FOUNDRY SAND/BYPRODUCTS FILL
Kohler Company Kohler, WI	Project 1902722	MARCH 2020 Fig. 2

\\grb1v-fs01\ K:\Kohler Co\1902722_Kohler Crane Yard Env Services 2019\CAD_GIS\001_Drawings\Figure 2.dwg - 3/18/2020

Table 1.

Soil Analytical Summary
Kohler Co. Crane Yard
444 Highland Drive, Kohler, WI

		Wisconsin Regulatory Standards[1,2]				Sample Location	CY-2	E1-2	E3-1	GL-1	CY-4	CY - West Test Pit	CY - Noth Test Pit	CY - Northwest Test Pit	CY - West #2
						Sample Date	7/30/18	7/30/18	5/29/18	9/17/18	5/31/19	6/26/19	6/26/19	6/26/19	7/25/19
		BTV	Non-Industrial DC	Industrial DC	GW	Sample Depth (ft)	9.5-11.0	4.0	4.0	1.0	2.5	7.0	2.0	4.0	2.0
	CAS #					Beneath/Outside Fill Zone[5]	Yes				Yes	Yes	Yes	Yes	Yes
METALS (detected analytes)[3,4] (mg/kg)															
Cadmium	7440-43-9	1	71	985	0.8		0.191	0.304	0.408	1.07	--	--	--	--	--
Copper	7440-50-8	35	3,130	46,700	91.6		10.97	28.2	145	37.6	--	--	--	--	--
Lead	7439-92-1	52	400	800	27		8.32	45.6	43.3	58.0	8.88	11.4	5.74	6.49	2.33
Manganese	7439-96-5	2,937	1,830	25,900	39.1		186	264	265	183.1	--	--	--	--	--
Molybdenum	7439-98-7	NE	391	5,840	1.6		< 0.430	0.47	< 0.424	0.594	--	--	--	--	--

Notes

(mg/kg) = milligrams per kilogram; (µg/kg) = micrograms per kilogram; -- = not analyzed;
< = not detected above method detection limit; DC = Direct Contact; GW = Groundwater
J = concentration between detection limit and reporting limit; NE = Not Established;

[1] NR 720 RCL = Chapter NR 720, Wisconsin Administrative Code, Residual Contaminant Level.

[2] RCLs & BTVs are based on USEPA methodology; presented in WDNR Guidance, Soil RCL Determinations using USEPA Regional Screening Level Web Calculator (RR-890) and summarized in the WDNR's R&R Program RCE Spreadsheet (December 2018).

[3] Only detected analytes are listed; refer to the laboratory analytical reports for a full list of assessed analytes

[4] Metal concentrations above an RCL, but not noted as such on this table, are considered to be representative of background conditions in Wisconsin soils.

[5] Sample collected outside or beneath the zone observed to contain historical fill containing cast foundry byproducts mixed with foundry sand and metal fragments.

Exceeds the NR 720 Non-Industrial Direct Contact RCL: *100* Exceeds the NR 720 Industrial Direct Contact RCL: **100**

Exceeds the BTV: 100

Table 2.
TCLP Metals Analytical Summary
Kohler Co. Crane Yard
444 Highland Drive, Kohler, WI

Sample No.	**Crane Yard***	**Crane Yard E1***	**Crane Yard E2***	**Crane Yard E3***	**Crane Yard E4***	**Crane Yard E5**	**Crane Yard E6**	**Regulatory Level for Toxicity Chracteristic (mg/L)**
Sample Date	5/31/2018	7/30/2018	7/30/2018	7/30/2018	7/30/2018	8/8/2019	8/8/2019	
Sample Depth (feet)	0 - 12	0 - 2	0 - 2	0 - 2	0 - 2	0 - 2	0 - 2	
TCLP Lead (mg/L)	0.247	0.09	0.47	3.05	3.34	0.41	0.19	5.0
TCLP Barium (mg/L)	1.91	2.58	1.66	3.31	2.4	--	--	100
TCLP Cadmium (mg/L)	0.019	0.03	0.05	0.25	0.04	--	--	1.0
TCLP Chromium (mg/L)	0.015	<0.003	<0.003	0.003	0.004	--	--	5.0

Notes

(mg/L) = milligrams per liter TCLP = Toxicity Characteristic Leaching Procedure < = analyte not detected above method detection limit -- = Not analyzed

* = Composite Sample

Threshold Concentrations for Toxicity Characteristic are referenced in the Code of Federal Regulations (CFR) 40 CFR§ 261.24

PHOTOGRAPHIC LOG

PHOTOGRAPH NO: 1	DATE: May 23, 2019	GEI PROJECT NO: 1902722	CLIENT: Kohler Company
DIRECTION: SE	SITE LOCATION: Kohler Plant Crane Yard, 444 Highland Drive, Kohler, WI		
DESCRIPTION: Crane yard during construction of new bridge crane and before installation of the new concrete pavement section.			

PHOTOGRAPH NO: 2	DATE: May 23, 2019	GEI PROJECT NO: 1902722	CLIENT: Kohler Company
DIRECTION: S-SW	SITE LOCATION: Kohler Plant Crane Yard, 444 Highland Drive, Kohler, WI		
DESCRIPTION: Historical cast iron byproducts fill excavated from beneath the central portion of the new bridge crane. The historical fill contains non-soil materials: iron foundry byproducts, metal fragments, and foundry sand.			

PHOTOGRAPHIC LOG

PHOTOGRAPH NO: 3	DATE: May 30, 2019	GEI PROJECT NO: 1902722	CLIENT: Kohler Company
DIRECTION: E-NE	SITE LOCATION: Kohler Plant Crane Yard, 444 Highland Drive, Kohler, WI		
DESCRIPTION: Shallow clay subgrade exposed during removal of soft historical fill for installation of the pavement section beneath the west-central portion of the new bridge crane.			

PHOTOGRAPH NO: 4	DATE: June 27, 2019	GEI PROJECT NO: 1902722	CLIENT: Kohler Company
DIRECTION: NA	SITE LOCATION: Kohler Plant Crane Yard, 444 Highland Drive, Kohler, WI		
DESCRIPTION: West Test Pit excavated through approximately 4 feet of historical cast iron byproducts fill and into underlying native clayey soil.			

PHOTOGRAPHIC LOG

PHOTOGRAPH NO: 5	DATE: June 27, 2019	GEI PROJECT NO: 1902722	CLIENT: Kohler Company
DIRECTION: N/A	SITE LOCATION: Kohler Plant Crane Yard, 444 Highland Drive, Kohler, WI		
DESCRIPTION: Northwest Test Pit excavated through approximately 1.5 feet of historical cast iron byproducts fill and into underlying apparent native clayey soil.			

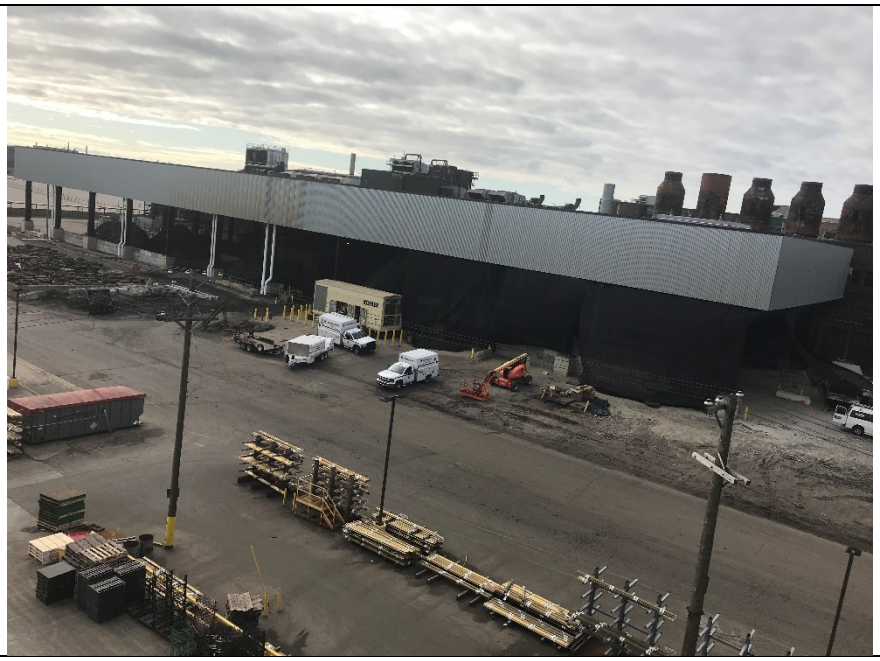
PHOTOGRAPH NO: 6	DATE: June 27, 2019	GEI PROJECT NO: 1902722	CLIENT: Kohler Company
DIRECTION: SW	SITE LOCATION: Kohler Plant Crane Yard, 444 Highland Drive, Kohler, WI		
DESCRIPTION: North Test Pit excavated through topsoil and into native clayey soil. Historical cast iron byproducts fill was not observed in this test pit.			

PHOTOGRAPHIC LOG

PHOTOGRAPH NO: 7	DATE: October 1999	GEI PROJECT NO: 1902722	CLIENT: Kohler Company
DIRECTION: NW	SITE LOCATION: Kohler Plant Crane Yard, 444 Highland Drive, Kohler, WI		
DESCRIPTION: Excavation of petroleum-impacted soil from the southernmost Gate 5 underground storage tank excavation. Historical iron byproducts fill was not observed in the excavation.			

PHOTOGRAPH NO: 8	DATE: July 25, 2019	GEI PROJECT NO: 1902722	CLIENT: Kohler Company
DIRECTION: N/A	SITE LOCATION: Kohler Plant Crane Yard, 444 Highland Drive, Kohler, WI		
DESCRIPTION: Hand auger soil sample (CY West Sample #2) collected from the base of a utility tunnel west of the Crane yard area and beneath a north-south access road. Historical iron byproducts fill was not observed in the tunnel or hand auger boring.			

PHOTOGRAPHIC LOG

PHOTOGRAPH NO: 9	DATE: April 10, 2020	GEI PROJECT NO: 1902722	CLIENT: Kohler Company
DIRECTION: SE	SITE LOCATION: Kohler Plant Crane Yard, 444 Highland Drive, Kohler, WI		
DESCRIPTION: Crane yard after installation of the new bridge crane, concrete pavement, roof and facia.			

PHOTOGRAPH NO: 10	DATE: August 15, 2019	GEI PROJECT NO: 1902722	CLIENT: Kohler Company
DIRECTION: W	SITE LOCATION: Kohler Plant Crane Yard, 444 Highland Drive, Kohler, WI		
DESCRIPTION: View across the crane yard after substantial completion of the new bridge crane and installation of the new concrete pavement.			

****THIS REPORT SHOULD NOT BE REPRODUCED EXCEPT IN FULL****

CHEMICAL AND METALLURGICAL LABORATORY REPORT - KOHLER CO.

Report No.: 1809069
Date Issued: 9-14-18

REPORT TITLE: Total Metal Concentrations in Crane Yard Soil Samples

---

OBJECTIVE

Determine the total antimony, cadmium, copper, lead, manganese, and molybdenum concentrations from three soil samples collected from the Crane Yard. Dan Tresp collected sample CY-2 using a geoprobe at a depth of 9.5-11 feet on 5/29/18. Samples E1-2 and E3-1 are grab samples collected at a depth of 4 feet on 7/30/18.

EXPERIMENTAL PROCEDURE

The samples were analyzed by following C&M Laboratory procedures 729A – Total Solids: Solids Dried at 103° – 105°C, and 734 – Elemental Analysis by ICP Atomic Emission Spectroscopy. The total solids analysis was completed on 9/12/18.

RESULTS

NOTE: The results relate only to the items tested. The results are being reported on a dry-weight basis. Sample CY-2 had exceeded the holding time for these analyses.

Metal Concentrations in Crane Yard Soil Samples

Analyte	CY-2 (µg/G)	E1-2 (µg/G)	E3-1 (µg/G)	Analysis Date
Antimony	<3.10	<3.10	<3.06	9/11/18
Cadmium	0.191	0.304	0.408	9/11/18
Copper	10.97	28.2	145	9/11/18
Lead	8.32	45.6	43.3	9/11/18
Manganese	186	264	265	9/11/18
Molybdenum	<0.430	0.47	<0.424	9/11/18

Authored by: Lisa Escher, Elena Diaz de Leon, Joseph Mayo

Reviewed by: Mary Jo Grabner

Distribution:

Dan Tresp
File

KOHLER

CHAIN OF CUSTODY RECORD
Chemical & Metallurgical Laboratory
444 Highland Drive, MS 205
Kohler, WI 53044
(920) 457-4441 Fax: (920) 803-4882

Report Number: 1809069
Report to: Dan Tresp
Account Charged: MA1234Y
Is this testing being conducted for regulatory monitoring? Yes / No
If so, which regulations apply?
Drinking Water
RCRA
NPDES
Other:
The Lab has permission to dispose of remaining sample? Yes / No

Sampled By:
(Print Name) Dan Tresp
(Print Name)
(Print Name)

End:
Start:

Field Interf. Check
Interf. Check Result

ANALYSES

Date	Time	Sample Description	Comp	Grab	Matrix	4°C	HCl	NaOH	HNO3	H2SO4	Other	Preserv. Verified	Total Pb, Cd, Cu, Mn, Mo, Sb	Comments
7/30/18		Crane Yard E1-2											X	grab at 4' deep
7/30/18		Crane Yard E3-1											X	grab at 4' deep
5/29/18		Crane Yard CY-2											X	9.5' - 11' geoprobe.

Field Preserved
#/Container Type (P=Plastic G=Glass)

Relinquished by: Dan Tresp
Date: 9/10/18
Time: am / pm

C&M LAB USE ONLY

Sample Acceptance:		Y	N		Y	N		Y	N
	Hold time can be met?			Sample vol. sufficient?			Received on ice?		
	Bottles appropriate?			VOCs free of headspace?			Drinking water temp on receipt:	°C / °F	
	Bottles intact?			Field filtered?					

Received for Lab by: Lisa Eicher
Date: 9-10-18
Time: 2:32 am / pm

June 2016 Version 1.0

****THIS REPORT SHOULD NOT BE REPRODUCED EXCEPT IN FULL****

CHEMICAL AND METALLURGICAL LABORATORY REPORT - KOHLER CO.

Report No.: 1809105
Date Issued: 9-21-18

REPORT TITLE: Total Metal Concentrations in Crane Yard Soil Sample

---

OBJECTIVE

Determine the total antimony, cadmium, copper, lead, manganese, and molybdenum concentrations from a soil sample collected from the Crane Yard. Dan Tresp collected sample GL-1 at a depth of 12 inches on 9/17/18.

EXPERIMENTAL PROCEDURE

The sample was analyzed by following C&M Laboratory procedures 729A – Total Solids: Solids Dried at 103° – 105°C, and 734 – Elemental Analysis by ICP Atomic Emission Spectroscopy. The total solids analysis was completed on 9/19/18.

RESULTS

NOTE: The results relate only to the items tested. The results are being reported on a dry-weight basis.

Metal Concentrations in Crane Yard Soil Sample GL-1

Analyte	Concentration (µg/G)	Analysis Date
Antimony	<3.02	9/18/18
Cadmium	1.07	9/18/18
Copper	37.6	9/18/18
Lead	58.0	9/18/18
Manganese	183.1	9/18/18
Molybdenum	0.594	9/18/18

Authored by: Lisa Escher, Elena Diaz de Leon, Joseph Mayo

Reviewed by: Elena Diaz de Leon

Distribution:

Dan Tresp
File

KOHLER

CHAIN OF CUSTODY RECORD
Chemical & Metallurgical Laboratory
444 Highland Drive, MS 205
Kohler, WI 53044
(920) 457-4441 Fax: (920) 803-4882

Report Number: 1809105
Report to: Dan Tresp
Account Charged: MA1234Y
Is this testing being conducted for regulatory monitoring? Yes / No (No circled)
If so, which regulations apply?
Drinking Water
RCRA
NPDES
Other: X
The Lab has permission to dispose of remaining sample? Yes (circled) / No

Sampled By:
(Print Name) Dan Tresp
(Print Name)
(Print Name)

End:
Start:
Field Interf. Check
Interf. Check Result

ANALYSES

Field Preserved

Date	Time	Sample Description	Comp	Grab	Matrix	4°C	HCl	NaOH	HNO3	H2SO4	Other	Preserv. Verified	Total Phos, Ca, Cu, Mn, Mo, Se
9/17/18	1420	Crane Yard GL-1 (12')		1/G									X

#/Container Type (P=Plastic G=Glass)

Comments

Relinquished by: Dan Tresp
Date: 9/17/18
Time: am / pm

C&M LAB USE ONLY

Sample Acceptance:	Y	N		Y	N		Y	N
Hold time can be met?	✓		Sample vol. sufficient?	✓		Received on ice?		✓
Bottles appropriate?	✓		VOCs free of headspace?	—		Drinking water temp on receipt: °C / °F		
Bottles intact?	✓		Field filtered?	—				

Received for Lab by: Lisa Eicher
Date: 9-18-18
Time: 6:35 am / pm

June 2016 Version 1.0

THIS REPORT SHOULD NOT BE REPRODUCED EXCEPT IN FULL

KOHLER. CHEM Lab

Report Number: 1906001 **Date Issued:** 6-27-19

REPORT TITLE: Total Lead Concentration in Crane Yard Soil CY-4

OBJECTIVE

Determine the total lead concentration in a soil sample from the Crane Yard labeled CY-4. Dan Tresp collected the sample on 5/31/19.

EXPERIMENTAL PROCEDURE

The sample was analyzed by following CHEM Lab 734 – Elemental Analysis by ICP Atomic Emission Spectroscopy. The analysis was completed on 6/17/19.

RESULTS

The results relate only to the items tested.

Total Lead concentration = 8.88 µg/G

Authored by: Lisa Escher, Elena Diaz de Leon **Reviewed by:** Mary Jo Grabner

Distribution: Dan Tresp File

KOHLER

CHAIN OF CUSTODY RECORD
Chemical & Metallurgical Laboratory
444 Highland Drive, MS 205
Kohler, WI 53044
(920) 457-4441 Fax: (920) 803-4882

Report Number: 1906001
Report to: Dan Tresp
Account Charged: PL 5242 H

Sampled By:
(Print Name) Dan Tresp
(Print Name)
(Print Name)

End:
Start:

Field Interf. Check
Interf. Check Result

Is this testing being conducted for regulatory monitoring? Yes No
If so, which regulations apply?
Drinking Water
RCRA
NPDES
Other: X

The Lab has permission to dispose of remaining sample? Yes No

Date	Time	Sample Description	Comp	Grab	Matrix	4°C	HCl	NaOH	HNO3	H2SO4	Other	Preserv.	Verified	ANALYSES: Total Pb							Comments
			Field Preserved																		
			#/Container Type (P=Plastic G=Glass)																		
5/31/19	1320	Crane Yard Soil CY-4		1/P										X							

Relinquished by: Dan Tresp Date: 6/3/19 Time: am / pm

C&M LAB USE ONLY		Y	N		Y	N		Y	N
Sample Acceptance:	Hold time can be met?	✓		Sample vol. sufficient?	✓		Received on ice?		✓
	Bottles appropriate?	✓		VOCs free of headspace?	—		Drinking water temp on receipt:	— °C / °F	
	Bottles intact?	✓		Field filtered?	—				

Received for Lab by: Lisa Eicher Date: 6/3/19 Time: 8:05 am / pm

June 2016 Version 1.0

THIS REPORT SHOULD NOT BE REPRODUCED EXCEPT IN FULL

KOHLER. CHEM Lab

Report Number: 1906233 **Date Issued:** 6-28-19

REPORT TITLE: Total Lead Concentration in CY Soil Samples

OBJECTIVE

Determine the total lead concentration in three soil samples from CY Test Pits. Dan Tresp collected the samples on 6/26/19.

EXPERIMENTAL PROCEDURE

The soil samples were analyzed by following CHEM Lab procedure 734 – Elemental Analysis by ICP Atomic Emission Spectroscopy. The analyses were performed on 6/27/19.

RESULTS

The results relate only to the items tested.

Sample ID	Lead Concentration (µg/G)
CY – West Test Pit	11.4
CY – North Test Pit	5.74
CY – Northwest Test Pit	6.49

Authored by: Lisa Escher, Elena Diaz de Leon **Reviewed by:** Mary Jo Grabner

Distribution: Dan Tresp File

KOHLER

CHAIN OF CUSTODY RECORD
Chemical & Metallurgical Laboratory
444 Highland Drive, MS 205
Kohler, WI 53044
(920) 457-4441 Fax: (920) 803-4882

Report Number: 1906223
Report to: Dan Tresp
Account Charged: PL5242H

Sampled By:
(Print Name) Dan Tresp
(Print Name)
(Print Name)

End:
Start:

Field Interf. Check
Interf. Check Result

Is this testing being conducted for regulatory monitoring? Yes (No)
If so, which regulations apply?
Drinking Water
RCRA
NPDES
Other: X

The Lab has permission to dispose of remaining sample? (Yes) No

ANALYSES

Date	Time	Sample Description	Comp	Grab	Matrix	4°C	HCl	NaOH	HNO3	H2SO4	Other	Preserv. Verified	Total Pb							Comments
			Field Preserved																	
			#/Container Type (P=Plastic G=Glass)																	
6/26/19		CY- West Test Pit		1/P									X							Grab @ 7' deep
6/26/19		CY- North Test Pit		1/P									X							Grab @ 2' deep
6/26/19		CY- Northwest Test Pit		1/P									X							Grab @ 4' deep

Relinquished by: Dan Tresp Date: 6/27/19 Time: am / pm

C&M LAB USE ONLY

Sample Acceptance:		Y	N		Y	N		Y	N
	Hold time can be met?	✓		Sample vol. sufficient?	✓		Received on ice?		✓
	Bottles appropriate?	✓		VOCs free of headspace?			Drinking water temp on receipt: °C / °F		
	Bottles intact?	✓		Field filtered?					

Received for Lab by: Lisa Escher Date: Time: 6/27/19 9:25 am / pm

June 2016 Version 1.0

THIS REPORT SHOULD NOT BE REPRODUCED EXCEPT IN FULL

KOHLER. CHEM Lab

Report Number: 1907178 **Date Issued:** 8-1-19

REPORT TITLE: Lead Concentration in CY-West #2 Soil Sample

OBJECTIVE

Determine the total lead concentration in a soil sample labeled CY-West #2. The sample is a grab sample collected at two feet below the utility tunnel. Dan Tresp collected the sample on 7/25/19.

EXPERIMENTAL PROCEDURE

The sample was analyzed on 7/30/19 by following CHEM Lab procedure 734 – Elemental Analysis by ICP Atomic Emission Spectroscopy.

RESULTS

The results relate only to the items tested.

Total Lead Concentration = 2.33 µg/G

Authored by: Lisa Escher, Elena Diaz de Leon **Reviewed by:** Mary Jo Grabner

Distribution:

Dan Tresp
File

KOHLER®

CH[illegible] OF CUSTODY RECORD

Chemi[illegible] Metallurgical Laboratory

444 Highland Drive, MS 205
Kohler, WI 53044
(920) 457-4441 Fax: (920) 803-4882

Report Number:

Report to: Dan Tresp

Account Charged: PLS242A

Is this testing being conducted for regulatory monitoring? Yes / No (No circled)

If so, which regulations apply?

Drinking Water	
RCRA	
NPDES	
Other: X	

The Lab has permission to dispose of remaining sample? Yes (circled) / No

Sampled By:
(Print Name) Dan Tresp
(Print Name)
(Print Name)

End:
Start:

Field Interf. Check
Interf. Check Result

ANALYSES

Date	Time	Sample Description	Comp	Grab	Matrix	4°C	HCl	NaOH	HNO3	H2SO4	Other	Preserv. Verified	Total P							Comments
			#/Container Type (P=Plastic G=Glass)																	
7/25/18	1350	CY - West #2		1/2									X							Grab collected @ 2' below utility tunnel

Relinquished by: Dan Tresp Date: 7/25/18 Time: am / pm

C&M LAB USE ONLY

Sample Acceptance:		Y	N		Y	N		Y	N
	Hold time can be met?			Sample vol. sufficient?			Received on ice?		
	Bottles appropriate?			VOCs free of headspace?			Drinking water temp on receipt:	°C / °F	
	Bottles intact?			Field filtered?					

Received for Lab by: Date: Time: am / pm

June 2016 Version 1.0

****THIS REPORT SHOULD NOT BE REPRODUCED EXCEPT IN FULL****

CHEMICAL AND METALLURGICAL LABORATORY REPORT - KOHLER CO.

Report No.: 1806004
Date Issued: 6-14-18

REPORT TITLE: Analysis of Crane Yard Soil for TCLP Metals

OBJECTIVE

Determine if a soil sample from the Crane Yard is TCLP hazardous for metals. The sample is a composite of soil samples collected at CY-1, CY-2, CY-3, and CY-4. Dan Tresp collected the sample on 5/31/18.

CONCLUSIONS

- The Crane Yard soil sample is not TCLP hazardous for any of the RCRA metals.

EXPERIMENTAL PROCEDURE

The sample was extracted on 6/5/18 according to C&M Laboratory procedure 728A – Toxicity Characteristic Leaching Procedure. The extract was analyzed for metals by following C&M Laboratory procedure 734 – Elemental Analysis by ICP Atomic Emission Spectroscopy, and 758 – Milestone DMA-80 Direct Mercury Analyzer.

RESULTS

The results relate only to the items tested.

Analyte	Concentration (mg/L)	RCRA Limits (mg/L)	Analysis Date
TCLP Arsenic	<0.03	5	6/6/18
TCLP Barium	1.91	100	6/6/18
TCLP Cadmium	0.019	1.0	6/6/18
TCLP Chromium	0.015	5.0	6/6/18
TCLP Lead	0.247	5.0	6/6/18
TCLP Mercury	<0.00240	0.2	6/12/18
TCLP Selenium	<0.04	1.0	6/6/18
TCLP Silver	<0.01	5.0	6/6/18

Authored by: Lisa Escher, Joan Deno, Joseph Mayo **Reviewed by:** Mary Jo Grabner

---

Distribution:

Dan Tresp
File

KOHLER

CHAIN OF CUSTODY RECORD

Chemical & Metallurgical Laboratory
444 Highland Drive, MS 205
Kohler, WI 53044
(920) 457-4441 Fax: (920) 803-4882

Report Number: 1806004
Report to: Dan Tresp
Account Charged: MA1234Y
Is this testing being conducted for regulatory monitoring? Yes / No (No circled)
If so, which regulations apply? Drinking Water / RCRA (X) / NPDES / Other:
The Lab has permission to dispose of remaining sample? Yes (circled) / No

Sampled By:
(Print Name) Dan Tresp
(Print Name)
(Print Name)

End:
Start:

Field Interf. Check
Interf. Check Result

ANALYSES

Date	Time	Sample Description	Comp	Grab	Matrix	4°C	HCl	NaOH	HNO3	H2SO4	Other	Preserv.	Verified	TCLP Metals							Comments
			Field Preserved																		
			#/Container Type (P=Plastic G=Glass)																		
5/31/18	1410	Crane Yard Soil	1/P											X							Composite of soil samples collected at CY-1, CY-2, CY-3, CY-4
																					include diagram in report

Relinquished by: Dan Tresp Date: 6/1/2018 Time: am / pm

C&M LAB USE ONLY

Sample Acceptance:		Y	N		Y	N		Y	N
	Hold time can be met?			Sample vol. sufficient?			Received on ice?		
	Bottles appropriate?			VOCs free of headspace?			Drinking water temp on receipt: °C / °F		
	Bottles intact?			Field filtered?					

Received for Lab by: Lisa Escher Date: 6/1/18 Time: 9:52 am / pm

June 2016 Version 1.0

****THIS REPORT SHOULD NOT BE REPRODUCED EXCEPT IN FULL****

CHEMICAL AND METALLURGICAL LABORATORY REPORT - KOHLER CO.

Report No.: 1807223
Date Issued: 8-2-18

REPORT TITLE: Analysis of Crane Yard Soil for TCLP Metals

OBJECTIVE

Determine if four composite soil samples from the Crane Yard are TCLP hazardous for arsenic, barium, cadmium, chromium, or lead. Dan Tresp collected the samples on 7/30/18. The samples are composites collected in the following locations:

- Crane Yard E1 is a composite of E1-1, E1-2, and E1-3
- Crane Yard E2 is a composite of E2-1, E2-2, and E2-3
- Crane Yard E3 is a composite of E3-1, E3-2, and E3-3
- Crane Yard E4 is a composite of E4-1 and E4-2

CONCLUSIONS

- None of the Crane Yard soil samples are TCLP hazardous for arsenic, barium, cadmium, chromium, or lead.

EXPERIMENTAL PROCEDURE

The samples were extracted on 8/15/18 according to C&M Laboratory procedure 728A – Toxicity Characteristic Leaching Procedure. The extracts were analyzed for metals by following C&M Laboratory procedure 734 – Elemental Analysis by ICP Atomic Emission Spectroscopy. All analyses were completed on 8/2/18.

RESULTS

The results relate only to the items tested.

Analyte	Units	Crane Yard E1	Crane Yard E2	Crane Yard E3	Crane Yard E4
TCLP Arsenic	mg/L	<0.031	<0.031	<0.031	<0.031
TCLP Barium	mg/L	2.58	1.66	3.31	2.40
TCLP Cadmium	mg/L	0.03	0.05	0.25	0.04
TCLP Chromium	mg/L	<0.003	<0.003	0.003	0.004
TCLP Lead	mg/L	0.09	0.47	3.05	3.34

Authored by: Lisa Escher, Joseph Mayo **Reviewed by:** Mary Jo Grabner

---

Distribution: Dan Tresp File

KOHLER

CHAIN OF CUSTODY RECORD
Chemical & Metallurgical Laboratory
444 Highland Drive, MS 205
Kohler, WI 53044
(920) 457-4441 Fax: (920) 803-4882

Report Number: 1807223
Report to: Dan Tresp
Account Charged: MA1234Y

Sampled By:
(Print Name) Dan Tresp
(Print Name)
(Print Name)

End:
Start:

Field Interf. Check
Interf. Check Result

Is this testing being conducted for regulatory monitoring? Yes **No**
If so, which regulations apply?
Drinking Water
RCRA X
NPDES
Other:

The Lab has permission to dispose of remaining sample? **Yes** No

ANALYSES

Date	Time	Sample Description	#/Container Type (P=Plastic G=Glass)	Comp	Grab	Matrix	4°C	HCl	NaOH	HNO3	H2SO4	Other	Preserv. Verified	TCLP Pb, Cd, Cr, Ba							Comments
7/30/18		Crane Yard E1	1/P											X							Composite of E1-1, E1-2, E1-3
7/30/18		Crane Yard E2	1/P											X							Composite of E2-1, E2-2, E2-3
7/30/18		Crane Yard E3	1/P											X							Composite of E3-1. E3-2, E3-3
7/30/18		Crane Yard E4	1/P											X							Composite of E4-1, E4-2

Relinquished by: Dan Tresp Date: Time: am / pm

C&M LAB USE ONLY

Sample Acceptance:		Y	N		Y	N		Y	N
	Hold time can be met?	✓		Sample vol. sufficient?	✓		Received on ice?		✓
	Bottles appropriate?	✓		VOCs free of headspace?	—		Drinking water temp on receipt: °C / °F		
	Bottles intact?	✓		Field filtered?	—				

Received for Lab by: Lisa Eacher Date: 7-30-18 Time: 2:00 am / pm

June 2016 Version 1.0

****THIS REPORT SHOULD NOT BE REPRODUCED EXCEPT IN FULL****

CHEMICAL AND METALLURGICAL LABORATORY REPORT - KOHLER CO.

Report No.: 1808083
Date Issued: 8-13-18

REPORT TITLE: Analysis of Crane Yard Soil Samples for TCLP Lead Concentrations

---

OBJECTIVE

Determine if two soil samples from the Crane Yard are TCLP hazardous for lead. Dan Tresp collected the samples on 8/8/18.

CONCLUSIONS

- Neither sample from the Crane Yard is TCLP hazardous for lead.

EXPERIMENTAL PROCEDURE

The samples were extracted on 8/10/18 according to C&M Laboratory procedure 728A – Toxicity Characteristic Leaching Procedure. The extracts were analyzed for lead by following C&M Laboratory procedure 734 – Elemental Analysis by ICP Atomic Emission Spectroscopy. All analyses were completed on 8/13/18.

RESULTS

The results relate only to the items tested.

Analyte	Units	Crane Yard E5	Crane Yard E6
TCLP Lead	mg/L	0.41	0.19

Authored by: Lisa Escher, Joseph Mayo **Reviewed by:** Mary Jo Grabner

---

Distribution: Dan Tresp File

KOHLER

CHAIN OF CUSTODY RECORD
Chemical & Metallurgical Laboratory
444 Highland Drive, MS 205
Kohler, WI 53044
(920) 457-4441 Fax: (920) 803-4882

Report Number: 1808083
Report to: Dan Trosp
Account Charged: MA1234Y
Is this testing being conducted for regulatory monitoring? Yes (No)
If so, which regulations apply?
Drinking Water
RCRA X
NPDES
Other:
The Lab has permission to dispose of remaining sample? (Yes) No

Sampled By:
(Print Name) Dan Trosp
(Print Name)
(Print Name)

End:
Start:

Field Interf. Check
Interf. Check Result

ANALYSES

Date	Time	Sample Description	Comp	Grab	Matrix	4°C	HCl	NaOH	HNO3	H2SO4	Other	Preserv. Verified	Tcup.Pb							Comments
			#/Container Type (P=Plastic G=Glass)																	
8/8/18	1020	Crane Yard E5		1/P									X							
8/8/18	0750	Crane Yard E6		1/P									X							

Relinquished by: Dan Trosp Date: 8/8/18 Time: am / pm

C&M LAB USE ONLY

Sample Acceptance:		Y	N		Y	N		Y	N
	Hold time can be met?	✓		Sample vol. sufficient?	✓		Received on ice?		✓
	Bottles appropriate?	✓		VOCs free of headspace?	—		Drinking water temp on receipt: °C / °F		
	Bottles intact?	✓		Field filtered?	—				

Received for Lab by: Lorian Escher Date: 8/8/18 Time: 11:30 (am) / pm

June 2016 Version 1.0