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

Case Closure

SUBMIT AS UNBOUND PACKAGE IN THE ORDER SHOWN

Notice: Pursuant to ch. 292, Wis. Stats., and chs. NR 726 and 746, Wis. Adm. Code, this form is required to be completed for case closure requests. The closure of a case means that the Department of Natural Resources (DNR) has determined that no further response is required at that time based on the information that has been submitted to the DNR. All sections of this form must be completed unless otherwise directed by the Department. DNR will consider your request administratively complete when the form and all sections are completed, all attachments are included, and the applicable fees required under ch. NR 749, Wis. Adm. Code, are included, and sent to the proper destinations. Personal information collected will be used for administrative purposes and may be provided to requesters to the extent required by Wisconsin's Open Records Law (ss. 19.31 - 19.39, Wis. Stats.). Incomplete forms will be considered "administratively incomplete" and processing of the request will stop until required information is provided.

Site Information

BRRTS No.	VPLE No.
02-41-580017	

Parcel ID No.
75-50-192003

FID No.	WTM Coordinates X	WTM Coordinates Y
241928940	682284.1	273234.2

BRRTS Activity (Site) Name	WTM Coordinates Represent:
Bright Cleaners	☒ Source Area ☐ Parcel Center

Site Address	City	State	ZIP Code
7249 South 76th Avenue	Franklin	WI	53402

Acres Ready For Use
18

Responsible Party (RP) Name
Schawanda Grissom

Company Name
Phillips Edison & Company

Mailing Address	City	State	ZIP Code
11501 Northlake Dr	Cincinnati	OH	45249

Phone Number	Email
(513) 824-7141	sgrissom@phillipsedison.com

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

Environmental Consultant Name
Steve Newlin

Consulting Firm
Apex Companies LLC

Mailing Address	City	State	ZIP Code
300 South Wacker Drive	Chicago	IL	60606

Phone Number	Email
(847) 956-8589	snewlin@apexcos.com

Fees and Mailing of Closure Request

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

   ☐ $1,050 Closure Fee

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

   ☐ $300 Database Fee for Soil

   Total Amount of Payment $ _____

   ☒ Resubmittal, Fees Previously Paid

2. **Send one paper copy and one e-copy on compact disk of the entire closure package** to the Regional Project Manager assigned to your site. Submit as *unbound, separate documents* in the order and with the titles prescribed by this form. For electronic document submittal requirements, see **http://dnr.wi.gov/files/PDF/pubs/rr/RR690.pdf.**

Site Summary

If any portion of the Site Summary Section is not relevant to the case closure request, you must fully explain the reasons why in the relevant section of the form. All information submitted shall be legible. Providing illegible information will result in a submittal being considered incomplete until corrected.

1. General Site Information and Site History

A. Site Location: Describe the physical location of the site, both generally and specific to its immediate surroundings.
The former Bright Cleaners was located within a shopping mall, referred to as Franklin Centre (the Site) located at 7249 South 76th Street in Franklin, Milwaukee County, Wisconsin.

According to information obtained from the City of Franklin, Franklin Centre consists of two parcels of land identified as Parcels # 755-1002-000 and 755-0192-003. T A Site Location Map is included as B.1.a, a Site Plan is included as B.1b. The Site is located in Franklin, WI approximately 10 miles southwest of downtown Milwaukee and approximately 2.2 miles northeast of downtown Franklin, WI in an area of mixed residential and commercial development. The Site is bordered to the north by an out parcel bank, restaurant, and a multi-tenant commercial retail building followed by W Rawson Avenue. The Site is bordered to the east by two out parcel banks and a restaurant followed by S 76th Street. The Site is bordered to the south by undeveloped properties and condominium properties followed by Terrace Drive. The Site is bordered to the west by undeveloped properties followed by W. Loomis Road / Wisconsin 36.

B. Prior and current site usage: Specifically describe the current and historic occupancy and types of use.
Based on the review of historical sources, the Site was first used for agricultural purposes as early as 1937. By 1995, the Site was developed with a multi-tenant commercial retail shopping center as observed today. Further development of the Site continued until at least 2010 when Building 2 at the Site was depicted as developed.

The Site is currently developed with two, single-story commercial shopping center buildings anchored by a Pick-N-Save grocery store. The anchor tenant shopping center building (Building 1) was reportedly developed in 1993. The second shopping center building (Building 2) was reportedly developed in 2009. The Site includes 15 tenant spaces. According to information provided for the Site by the current property manager, the shopping center buildings combined have approximately +/- 119,676 square feet of leasable space. The buildings are generally surrounded by parking spaces and drive lanes. Drive lanes for product delivery vehicles generally are located along the western and southern portions of the Site. The remaining balance of the Site is covered by landscaping, associated vegetation, and impervious surfaces including concrete pedestrian walkways and curbs.

C. Current zoning (e.g., industrial, commercial, residential) for the site and for neighboring properties, and how verified (Provide documentation in Attachment G).
The Site is zoned commercial. The surrounding properties are zoned commercial/residential.

D. Describe how and when site contamination was discovered.
A Limited Phase II Environmental Site Assessment (ESA) conducted by others in May 2011 discovered 1,1,1-tetrachloroethane (1,1,1-TCA) at concentrations above Wisconsin Department of Natural Resources (WDNR) Regional Contaminant Levels (RCLs) in one shallow soil sample taken behind the Bright Cleaners tenant space. Approximately 58 tons of impacted soil were removed near the rear door of the tenant space in June 2011. The facility received closure from the WDNR in December 2013. During the Phase I ESA conducted in August 2016, Apex observed staining on the floor in the tenant space and the ongoing use of PCE for the dry cleaning operations.

Based on the ongoing dry cleaning operations and the use of chlorinated solvents after the original Phase II ESA, Apex Companies LLC conducted subsurface investigation in the vicinity of the tenant space in August 2016 to assess current environmental conditions.

The subsurface assessment included the advancement of three soil borings that were converted into temporary monitoring wells in the parking lot/driveway south of the dry cleaning tenant space; installation of three sub-slab soil gas probes within the tenant space; and collection/analysis of three soil samples, two groundwater samples and three sub-slab soil gas samples for volatile organic compounds (VOCs) including chlorinated solvents associated with dry cleaning operations.

The soil analysis detected methylene chloride in one soil sample at a concentration in excess of Wisconsin remediation objectives. However, it is Apex's opinion that methylene chloride is not associated with Site operations, but is more likely a result of laboratory contamination from the sample handling process. The soil analysis did not detect any additional compounds in excess of Wisconsin remediation objectives. Similarly, the groundwater analysis did not detect any compounds in excess of Wisconsin groundwater quality standards or vapor intrusion screening levels.

However, the soil gas analysis detected tetrachloroethene (PCE) at a concentrations in excess of Wisconsin remediation objectives in two of the three sub-slab soil gas samples. The soil gas analysis did not detect any additional compounds at concentrations in excess of Wisconsin remediation objectives.

E. Describe the type(s) and source(s) or suspected source(s) of contamination.
The use of a dry-cleaning machine and the general handling of PCE at the former Bright dry-cleaners.

F. Other relevant site description information (or enter Not Applicable).
The dry-cleaning operations began sometime prior to 2001 and ceased in approximately November of 2018.

G. List BRRTS activity/site name and number for BRRTS activities at this source property, including closed cases.
No other sites besides Bright Cleaners are shown on the DNR's RR Sites Map on the subject property.

H. List BRRTS activity/site name(s) and number(s) for all properties immediately adjacent to (abutting) this source property.
On an adjacent property northeast of the Site is the following listing from the DNR's RR Sites Map:

CLOSED SITE

ONE HOUR MARTINIZING
BRRTS #: 0241253493
DNR Facilty ID #: 241301500
Address: 7103 S 76th St, Franklin
Start Date: April 12, 2000
Closed Date: February 7, 2006
X Coordinate (WTM91): 682432
Y Coordinate (WTM91): 273366

No other properties immediately adjacent to the Site were identified.

2. General Site Conditions

A. Soil/Geology

i. Describe soil type(s) and relevant physical properties, thickness of soil column across the site, vertical and lateral variations in soil types.
Apex has advanced seven borings at the Site to date to depths ranging from 4 to 20 feet bgs. The soil borings encountered the following generalized lithologic sequence:

-Asphalt approximately 4 inches thick was encountered at ground surface in the exterior borings (MW-1 through MW-3). Concrete approximately 5 inches thick was encountered in the interior boring (B-1). Topsoil, asphalt pavements and concrete were generally underlain by approximately 3 inches of crushed stone.
-Silty clay/clayey silt was encountered below the crushed stone/aggregate to a depth of 20 feet bgs, the maximum depth explored.
-A discontinuous silty/clayey sand lens was encountered in MW-2 at depths ranging from 10 to 11 feet bgs.
-Gravel, sand and/or crushed stone was commingled with clay in MW-2 at depths ranging from 4 to 10 feet bgs and may be backfilled material from construction activities.

It should be noted that previous remediation performed at the site included soil excavation and off-site disposal south of the dry-cleaner store. This remedial excavation was backfilled with crushed stone that appears to extend to approximately 10 feet bgs at the deepest point of the remedial excavation. A cross section of the Site is provided as B.3. a.

ii. Describe the composition, location and lateral extent, and depth of fill or waste deposits on the site.
Fill encountered in the exterior soil borings at the Site consisted of an asphalt pavement overlaying an approximate three inch thick layer of crushed stone. Shallow soil borings advanced inside the building encountered an approximate 4-inch concrete floor slab overlaying 4 to 6 inches of crushed limestone gravel.

iii. Describe the depth to bedrock, bedrock type, competency and whether or not it was encountered during the investigation.
Based on water well logs reviewed for this Closure Request, the bedrock in the area is beneath approximately 200 feet of clay soil. The bedrock is limestone from approximately 200 to 340 feet below the ground surface. Beneath the limestone a shale was encountered in one water well location.

Apex did not encounter bedrock during our site investigations.

iv. Describe the nature and locations of current surface cover(s) across the site (e.g., natural vegetation, landscaped areas, gravel, hard surfaces, and buildings).
The surface covers in the area of the former Bright Cleaners consist of concrete building floor slab, concrete sidewalk and asphalt paved parking lot. No landscaping or natural vegetation existing in the immediate vicinity of the Cleaners.

B. Groundwater

i. Discuss depth to groundwater and piezometric elevations. Describe and explain depth variations, including high and low water table elevation and whether free product affects measurement of water table elevation. Describe the stratigraphic unit(s) where water table was found or which were measured for piezometric levels.

Stabilized groundwater was measured at depths ranging from 8.40 to 11.97 feet from the top of the well casing (756.82 to 760.91 feet above mean sea level). Based upon water level measurements, Apex calculates groundwater flows to the south at a gradient of 0.03 ft./ft. (horizontal to vertical). Groundwater elevation contours measured on August 17, 2017 are shown in B.3.c. and table A.6 provides a summary of the groundwater elevations.

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

Based upon water level measurements in the three shallow groundwater monitoring wells installed on Site, Apex calculates groundwater flows to the south at a gradient of 0.03 ft./ft. (horizontal to vertical). Groundwater elevation contours measured on August 17, 2017 are shown in B.3.c. Apex does not have groundwater data to determine the flow direction in deeper aquifers. Water-well logs did not identify aquifers above limestone found at 200 feet bgs.

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

Apex performed in-situ hydraulic testing in three wells (MW-1, MW-2 and MW-3) to measure the hydraulic conductivity of the shallow aquifer (water bearing zone) beneath the Site. A pressure transducer/data logger was lowered below the water table and the water level was allowed to stabilize. The transducer/data logger was then connected to a Rugged Reader(r) using a waterproof coaxial cable. A quantity of water ('slug') was quickly removed from the well and rising head recovery rates were measured over time, until the water level recovered over the duration of the test. Due to the slow recovery in two wells (MW-1 and MW-3), the test was performed only once in these wells. The Bouwer & Rice Method was used to calculate a hydraulic conductivity (K) which ranged from 1.45 x 10-3 centimeters/second (for MW-2) to 3.10 x 10-6 centimeters/second (for MW-3) which shows that the hydraulic conductivity is highly variable at the Site. Apex believes that the higher hydraulic conductivity measured in well MW-2 is due to the discontinuous clayey sand lens observed at a depth of 10 to 11 feet bgs and was not present in soil borings MW-1 and MW-3. Considering that the potentiometric surface was consistent between wells MW-1 and MW-2, the clayey sand lens does not appear to be confined and localized groundwater flow in the shallow aquifer is characteristic of the predominant clayey silt/silty clay lithology. Additionally, a relatively slow hydraulic conductivity (10-6 centimeters/second) is consistent with the observed silty clay lithology.

iv. Identify and describe locations/distance of potable and/or municipal wells within 1200 feet of the site. Include general summary of well construction (geology, depth of casing, depth of screened or open interval).

Based on the Wisconsin Geological and Natural History Survey, there is one private water well that has been installed within a 1,200 foot radius of the Bright Cleaners. Based on the well log, the water well was drilled to 370 feet bgs. The log shows that the soil encountered from the ground surface was was predominately clay to approximately 200 feet bgs, where limestone bedrock was encountered . Some thin layers of gravel were encountered within the clay from 54 to 90 feet bgs.

The closest water well to the Site was cased with a 6-inch steel pipe grouted in-place from the ground surface to approximately 210 feet bgs.

The water well was installed in1978. It is not clear whether the water well still exists. The address that the well is listed for is now a commercial property that is supplied municipal water.

3. Site Investigation Summary

A. General

i. Provide a brief summary of the site investigation history. Reference previous submittals by name and date. Describe site investigation activities undertaken since the last submittal for this project and attach the appropriate documentation in Attachment C, if not previously provided.

Franklin Station LLC owns the Franklin Centre commercial property located at 7249 South 76th Street in Franklin, Milwaukee County, Wisconsin (the parent tract). This property is developed with a 120,000-square foot (SF) multi-tenant shopping center, asphalt-paved parking and landscaped areas located on a 14.6-acre parcel of land. One of the tenant spaces within the shopping center was a dry-cleaning facility know as Bright Cleaners (the Site).

A Limited Phase II ESA conducted by others in May 2011 discovered 1,1,1-tetrachloroethane (1,1,1-TCA) at concentrations above Wisconsin Department of Natural Resources (WDNR) Regional Contaminants Levels (RCLs) in one shallow soil sample collected behind the Bright Cleaners tenant space. Approximately 58 tons of impacted soil were removed near the rear door of the tenant space in June 2011. The facility received closure from the WDNR in December 2013.

During a Phase I ESA conducted in August 2016, Apex observed staining on the floor in the tenant space and the ongoing use of PCE for the dry-cleaning operations. Based on the dry-cleaning operations and the ongoing use of

chlorinated solvents, Apex conducted subsurface investigation in the vicinity of the tenant space in August 2016 to assess current environmental conditions. The subsurface assessment included the advancement of three soil borings that were converted into temporary monitoring wells in the parking lot/driveway south of the dry cleaning tenant space; installation of three sub-slab soil gas probes within the tenant space; and collection/analysis of three soil samples, two groundwater samples and three sub-slab soil gas samples for volatile organic compounds (VOCs) including chlorinated solvents associated with dry-cleaning operations.

The soil analysis did not detect any dry-cleaning related compounds in excess of Wisconsin remediation objectives. Similarly, the groundwater analysis did not detect any compounds in excess of Wisconsin groundwater quality standards or vapor intrusion screening levels. The soil gas analysis detected PCE at a concentration in excess of Wisconsin remediation objectives in two of the three sub-slab soil gas samples. The soil gas analysis did not detect any additional compounds at concentrations in excess of Wisconsin remediation objectives. Based on the concentrations of PCE detected in soil gas, it was Apex's opinion that additional sub-slab soil gas sampling should be conducted to delineate the impacted area.

The expanded subsurface assessment included the advancement of four soil borings (MW-1 through MW-3 and B-1); collection/analysis of soil samples from three soil borings (MW-1, MW-2, and B-1); installation, sampling and analysis of three permanent groundwater monitoring wells (MW-1 through MW-3); and, collection/analysis of three sub-slab soil-gas samples (SV-4 through SV-6) between August 11 and 17, 2017.

The soil analysis detected one VOC (methylene chloride) at concentrations in excess of RCLs for the soil (leaching) component to groundwater in two soil samples. The soil analysis did not detect VOCs at concentrations in excess of RCLs for direct contact. The groundwater analysis did not detect VOCs at concentrations in excess of GQSs and/or VRSLs, including methylene chloride. The soil-gas analysis detected one VOC (PCE) at concentrations in excess of VALs in two soil-gas samples. The site investigations, including the expanded subsurface investigations were summarized in Apex's Site Investigation Report dated November 3, 2017 and submitted to the WDNR. The analytical results for these investigations are summarized in tables A.1, A.2 and A.4. The sample point locations for the site investigations are illustrated on figure B.2.a.

Since the submittal of the Site Invession Report and the operation of a Soil Vapor Extraction (SVE) system, Apex conducted confirmatory sampling of soil, sub-slab vapor and indoor air to evaluate the effectiveness of the SVE system. On December 19, 2018 after the SVE system ran for approximately 3 months, Apex collected three sub-slab vapor samples from the previous sampled locations (SV-1, SV-2 and SV-7). The three sub-slab vapor samples were analyzed for VOCs by EPA Method TO-15. The samples did not have detected concentrations of VOCs above the Sub-Slab Commercial Vapor Action Levels (VALs).

The SVE system remained turned off for another six and a half months before Apex collected another round of sub-slab vapor samples on June 28, 2019 from the same locations. In addition to the sub-slab samples, Apex collected an indoor air sample (IA-1). The VOC concentrations in the soil gas samples and the indoor air sample were below the VALs.

In addition to air and vapor samples, On August 6, 2019, Apex collected three soil samples from beneath the floor slab adjacent to the sub-slab samples (HA-1, HA-2 and HA-7). The soil samples were collected by drilling a hole through the floor slab and hand augering with a pig-tailed auger through the base course. Once the auger was through the stone base course, the hand auger was advanced approximately six more inches into the native silty clay. The hand augers were removed and soil samples were collected from the native clay for chemical analysis.

The soil samples were placed in laboratory supplied vials, maintained on ice in a cooler and were submitted under chain of custody control for VOC analyses at a subcontract laboratory. The soil analysis did not detect VOCs in excess of the Residual Containment Levels (RCLs) for either direct contact or soil to groundwater. The post remedial soil gas, indoor air and soil analysis are summarized in tables A.2 and A.4.

At the request of the DNR, Apex returned to the Site on December 22, 2020 to collect a second round of groundwater samples from the three permanent monitoring wells. The groundwater samples were placed in laboratory supplied vials, maintained on ice in a cooler and were submitted under chain of custody control for VOC analyses at a subcontract laboratory.

The same day as the groundwater sampling, the exhaust pipe connected to the SVE system was capped to prevent soil-gas from beneath the floor slab from venting to the atmosphere. Then approximately three weeks later on January 11, 2021, Apex returned to collect additional one additional soil sample (SS-01) and six vapor samples from beneath the floor slab of the building (SV-1 and SV-4 through SV-8). Soil sample SS-01 and vapor sample SV-8 were collected adjacent to the bathroom floor drain to access the potential for preferential migration along the sewer and water utilities beneath the floor slab. Additionally, an indoor air and an exterior air samples were collected (AA-01 and AA-02). The soil, vapor and air samples were submitted to a subcontract laboratory under chain-of-custody control. The samples were analyzed for VOCs and did not have detections of VOCs in exceedances of their associated standards.

Based on the three rounds of investigation post remediation, the SVE system has effectively reduced sub-slab vapor

levels below the VALs. Also, there does not appear to be preferential migration along the sewer and water utilities beneath the floor slab.

ii. Identify whether contamination extends beyond the source property boundary, and if so describe the media affected (e.g., soil, groundwater, vapors and/or sediment, etc.), and the vertical and horizontal extent of impacts.

Based on previous investigations, no soil, groundwater or vapor impacts appear to extend beyond the property boundary.

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

NA.

B. Soil

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

Apex collected soil samples from nine borings, TW-1 (14 feet bgs), TW-2 (11 feet bgs), TW-3 (12 feet bgs), MW-1 (4 feet bgs), MW-2 (6 feet bgs), B-1 (2 feet bgs), HA-1(2 feet bgs), HA-2 (2 feet bgs), HA-3 (2 feet bgs) and SS-01 (2.5 feet bgs). The soil sample locations are shown on B.2.a.

The soil samples were analyzed for VOCs by EPA Method 5035/8260. The results of the soil analysis were compared to Non-Industrial and Industrial RCLs for Direct Contact and the soil (leaching) component to groundwater cited in the U.S. Environmental Protection Agency's (USEPA) Regional Screening Level Web-Calculator (March 2017) in accordance with Wisconsin Administrative Code NR 720 (WAC 720).

The soil analysis detected one VOC (methylene chloride) at concentrations that slightly exceed the RCL for the soil (leaching) component to groundwater exposure pathway in two samples (MW-1 and TW-1). The soil analysis did not detect any VOCs at concentrations in excess of RCLs for direct-contact (non-industrial and industrial), and no additional VOCs at concentrations in excess of RCLs for the soil component to groundwater per WAC 720. Methylene chloride is not believed to be a product used as part of the dry-cleaning process. methylene chloride is a common laboratory contaminant, and was detected in the method blank associated with sample TW-1. Therefore, it is Apex's opinion that methylene chloride detected in sample TW-1 is a laboratory artifact, and does not reflect contamination from historical Site operations. The soil analysis is summarized on A.2.

Based on the soil analysis conducted to date, dry-cleaning associated impacts to the soil do not appear to exist on the Site.

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

One of the methylene chloride detections in soil was from MW-1 at 4 feet bgs. The concentration detected was 0.0015 milligrams per kilograms (mg/kg) that slightly exceeds the soil leaching to groundwater RCL of 0.0013 mg/kg. However, it is Apex's opinion that methylene chloride detected in sample MW-1 is a laboratory artifact, and does not reflect contamination from historical Site operations.

On August 6, 2019, after the SVE System operation, Apex collected three soil samples from beneath the floor slab. Holes were drilled through the floor and a pig-tailed auger was then used to collect soil samples HA-1, HA-2 and HA-3 in the area of the former vapor exceedances. With the exception of chloromethane, which was detected in laboratory blanks, no VOCs were detected in the three soil samples above the laboratory's reportable limits.

Apex returned to the Site on January 11, 2021 to collect a soil sample adjacent to the drain in the restroom. The intent of this sampling was to assess potential preferential pathways along the sanitary and water lines beneath the floor in the bathroom. A hole was drilled through the bathroom floor and a pig-tailed auger was used to collect a soil sample adjacent to the floor drain at a depth of approximately 2.5 feet bgs.

Based on the post SVE System operation sampling, Apex did not identify any dry-cleaning related impacts in the upper four feet of the soil column on-site.

iii. Identify the ch. NR 720, Wis. Adm. Code, method used to establish the soil cleanup standards for this site. This includes a soil performance standard established in accordance with s. NR 720.08, a Residual Contaminant Level (RCL) established in accordance with s. NR 720.10 that is protective of groundwater quality, or an RCL established in accordance with s. NR 720.12 that is protective of human health from direct contact with contaminated soil. Identify the land use classification that was used to establish cleanup standards. Provide a copy of the supporting calculations/ information in Attachment C.

Apex compared the soil data to current RCLs for direct contact (non-industrial and industrial) and soil to groundwater (leaching) detailed in Wisconsin Administrative Code NR 720.

C. Groundwater

i. Describe degree and extent of groundwater contamination. Relate this to known or suspected sources and known or potential receptors/migration pathways. Specifically address any potential or existing impacts to water supply wells or interception with building foundation drain systems.

Apex installed six groundwater monitoring wells, three temporary and three permanent monitoring wells, in the vicinity of the former Bright Cleaners store. One round of groundwater samples was collected from the temporary groundwater monitoring wells (TW-1 and TW-3). The third temporary well was dry and a groundwater sample was not collected from this well (TW-2).

Two rounds of groundwater samples were collected from the permanent groundwater monitoring wells (MW-1, MW-2 and MW-3) on August 17 2017 and December 22, 2020.

The eight groundwater samples were analyzed for VOCs. The groundwater analysis did not detect VOCs at concentrations in excess of GQSs or VRSLs. Apex notes that methylene chloride was detected in two soil samples at concentrations in excess of the soil component to groundwater RCL; however, the groundwater analysis did not detect methylene chloride at concentrations in excess of method detection limits (MDLs) in the corresponding monitoring wells. The results of the groundwater analysis, GQSs and VRSLs are summarized in A.1 and the sample locations are shown in B.3.b.

ii. Describe the presence of free product at the site, including the thickness, depth, and locations. Identify the depth and location of the smear zone.

No free product has been identified at the Site.

D. Vapor

i. Describe how the vapor migration pathway was assessed, including locations where vapor, soil gas, or indoor air samples were collected. If the vapor pathway was not assessed, explain reasons why.

Prior to the operation of the SVE system, Apex collected 6 soil-gas samples immediately below the concrete floor slab in and adjacent to the dry cleaner tenant space at the locations shown in figure B.4.a. One soil-gas sample was collected near the center of the Bright Cleaners tenant space (SV-1), one adjacent to the dry cleaning plant (SV-2), one adjacent to chemical storage (SV-3) and three samples (SV-4 through SV-6) were used to assess the lateral extent of VOCs in sub-slab soil-gas.

The soil-gas samples were analyzed for VOCs by EPA Method TO-15. The results of the soil-gas analysis were compared to sub-slab Vapor Action Levels (VALs) for a commercial property use based on the USEPA VISL (Version 3.5.1, May 2016) with an excess lifetime cancer risk of 1 x 10-5 in accordance with WAC 716.

The soil-gas analysis detected PCE in two samples at concentrations in excess of commercial VALs per WAC 716 The results of the soil-gas analysis and VALs are summarized in A.4. The sample locations with VOC concentrations in excess of VALs are summarized and shown in B.4.a.

Post remediation, three rounds of vapor investigations were performed on December 19, 2018; June 28, 2019; and January 11, 2021.

Neither indoor air or sub-slab vapor analysis post remediation detected concentrations in excess of the small commercial standards. The results of the soil-gas analysis, indoor air and outdoor air analysis and VALs are summarized in A.4 and A.5.

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

Indoor Air Vapor Action Levels and Vapor Risk Screening Levels for Small Commercial based on November 2017 U.S. EPA Regional Screening Levels for carcinogenic and non-carcinogenic compounds per WAC 716. The two indoor air and the one outdoor air samples did not exceed the VALs.

E. Surface Water and Sediment

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

Groundwater impacts were not identified on-site. There is not a surface body water within a 2,500 foot radius of the site.

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

NA

4. Remedial Actions Implemented and Residual Levels at Closure

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

Prior to Apex's involvement with the Site, approximately 58 tons of impacted soil were removed near the rear door of the tenant space in June 2011. The facility received closure from the WDNR in December 2013.

Based on sub-slab vapors identified after the original closure, a SVE system was designed and installed in the dry-cleaner tenant space. The SVE system operated between September 17 and December 8, 2018. The details regarding the SVE system were provided in an installation report dated November 6, 2018.

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

NA

C. Describe the *active* remedial actions taken at the source property, including: type of remedial system(s) used for each media affected; the size and location of any excavation or in-situ treatment; the effectiveness of the systems to address the contaminated media and substances; operational history of the systems; and summarize the performance of the active remedial actions. Provide any system performance documentation in Attachment A.7.

To eliminate the soil-gas exposure pathway for building occupants, remediation was required. In order to address this exposure route, a Soil Vapor Extraction (SVE) system was installed and follow-up monitoring was conducted to verify the system was effectively mitigating vapor intrusion to indoor air.

Apex designed a SVE system intended to draw the soil-vapor from below the floor slab in the areas of soil-gas exceedances creating a vacuum beneath the slab which immediately reduced potential vapor intrusion from the sub-slab to indoor air. The extraction of sub-slab soil vapors and venting to the outside also decreased the concentrations of VOCs in sub-slab soil vapors over time. The design includes post-installation communication test to determine the radius of influence for the SVE system .

The SVE system was installed to address the potential indoor vapor intrusion and also reduce the chlorinated vapor concentrations beneath the building. The SVE system includes the following:

1. Three extraction sumps were installed with at least two cubic feet and extend approximately 6 inches below the floor slab ;
2. A PVC pipe of 3 inches in diameter extends from each extraction sump to the intake side of an in-line fan (Specifications enclosed in Appendix F) capable of achieving a static vacuum of at least 0.25 inches water column (wc) at the suction point and measurable vacuum at the farthest edges of the area served by the suction pit under worst case conditions (all exhaust fans and heating systems running, during cold weather) as determined by a differential pressure reading of at least -0.003 inches wc below the slab or visible downward flow of air at test holes using smoke sticks;
3. Visible cracks and joints in the slab (including the location where the PVC pipe exited the slab) and foundation walls were sealed;
4. The manifold pipe connecting the three sumps exits the back of the building and exhaust outside the building approximately10 feet above ground ; and
5. Following SVE system installation, the system was operated approximately 3 months from September 17, 2018 to December 8, 2018, before being shut off. Once the system was shut off, additional sub-slab vapor sampling was performed to confirm that the extraction system was performing as intended. These tests were performed approximately two weeks (December 19, 2018) and seven months (June 28, 2019) after the system had been shut down. The vapor samples confirmed that sub-slab vapor concentrations had been reduced to below the sub-slab vapor screening levels and remained below for seven months post SVE operation.

D. Describe the alternatives considered during the Green and Sustainable Remediation evaluation in accordance with NR 722.09 and any practices implemented as a result of the evaluation.

The objective for the proposed remediation at the Site was the mitigation of potential indoor vapor intrusion associated with the release of dry-cleaning solvent at the Site. Remedial options considered for the Site included the following:

1. No Action
2. In-situ Injections (biodegradation or chemical degradation)
3. Soil Vapor Extraction (SVE) system to mitigate vapor intrusion to indoor air

Given that the first two options do not address the short-term risk to human health of the occupants of the building, Apex selected Option number 3. Natural attenuation associated with Option 1 and the degradation associated with Option 2 require time to take effect and leave current tenants of the building exposed to potential inhalation risk until the attenuation/ degradation occurs. These two options would likely require years to achieve regulatory compliance.

The mitigation approach provided by Option 3 prevented potential vapors from entering the building after the SVE was installed and operational. The potential health risk to building occupants immediately upon installation. Option 3 mitigates potential indoor vapor intrusion both in the short and long term.

Other more intrusive remedial options are available, however with the existence of the on-site building, these options were not feasible for this Site.

E. Describe the nature, degree and extent of residual contamination that will remain at the source property or on other affected properties after case closure.

Other than what is believed to be laboratory artifacts in methylene chloride detections, no soil, groundwater or vapor samples had VOC detections in excess of the associated standards post SVE operation. Based on the chemical analysis performed post remediation, Apex does not believe residual contamination associated with the former dry-cleaners remains at the Site.

F. Describe the residual soil contamination within four feet of ground surface (direct contact zone) that attains or exceeds RCLs established under s. NR 720.12, Wis. Adm. Code, for protection of human health from direct contact.

No VOCs were detected in the soil samples at concentrations above the direct contact RCLs, with the exception of methylene chloride, detected in one sample, which is believed to have been a laboratory artifact.

G. Describe the residual soil contamination that is above the observed low water table that attains or exceeds the soil standard(s) for the groundwater pathway.

Methylene chloride, which is believed to be a laboratory artifact, is the only VOC soil detection in exceedance of a RCL.

H. Describe how the residual contamination will be addressed, including but not limited to details concerning: covers, engineering controls or other barrier features; use of natural attenuation of groundwater; and vapor mitigation systems or measures.

The vapor contamination has been addressed by the operation of the SVE System. The confirmatory vapor samples collected after the operation of the SVE System demonstrate that the system effectively lowered the VOCs beneath the floor slab to concentrations below current standards.

I. If using natural attenuation as a groundwater remedy, describe how the data collected supports the conclusion that natural attenuation is effective in reducing contaminant mass and concentration (e.g., stable or receding groundwater plume).

NA

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

Soil analysis post SVE operations did not identify any exceedances of the soil RCLs. Monitoring of the groundwater has not identified groundwater impacts.

The vapor inhalation exposure route was addressed by installing/operating a SVE System that lowered the sub-slab vapor concentration to levels below the current standards.

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

The SVE System is anticipated to remain in place. However, due to the cost to operate the system, there are no plans to continue to operate the system at this time.

L. Identify the need for a ch. NR 140, Wis. Adm. Code, groundwater Preventive Action Limit (PAL) or Enforcement Standard (ES) exemption, and identify the affected monitoring points and applicable substances.

NA

M. If a DNR action level for vapor intrusion was exceeded (for indoor air, sub slab, or both) describe where it was exceeded and how the pathway was addressed.

Initial sub-slab sampling identified two locations in exceedance of DNR action levels. The vapor inhalation exposure route was addressed by installing/operating a SVE System that lowered the sub-slab vapor concentrations to levels below the current standards.

N. Describe the surface water and/or sediment contaminant concentrations and areas after remediation. If a DNR action level was exceeded, describe where it was exceeded and how the pathway was addressed.

NA

5. Continuing Obligations: Includes all affected properties and rights-of-way (ROWs). In certain situations, maintenance plans are also required, and must be included in Attachment D.

Directions: For each of the 3 property types below, check all situations that apply to this closure request.

(NOTE: Monitoring wells to be transferred to another site are addressed in Attachment E.)

	This situation applies to the following property or Right of Way (ROW):			Case Closure Situation - Continuing Obligation (database fees will apply, ii. - xiv.)	Maintenance Plan Required
	Property Type:				
	Source Property	Affected Property (Off-Source)	ROW		
i.	☒	☒	☒	None of the following situations apply to this case closure request.	NA
ii.	☐	☐	☐	Residual groundwater contamination exceeds ch. NR 140 ESs.	NA
iii.	☐	☐	☐	Residual soil contamination exceeds ch. NR 720 RCLs.	NA
iv.				Monitoring Wells Remain:	
	☐	☐	☐	• Not Abandoned (filled and sealed)	NA
	☐	☐	☐	• Continued Monitoring (requested or required)	Yes
v.	☐	☐	☐	Cover/Barrier/Engineered Cover or Control for (soil) direct contact pathways (includes vapor barriers)	Yes
vi.	☐	☐	☐	Cover/Barrier/Engineered Cover or Control for (soil) groundwater infiltration pathway	Yes
vii.	☐	☐	☐	Structural Impediment: impedes completion of investigation or remedial action (not as a performance standard cover)	NA
viii.	☐	☐	☐	Residual soil contamination meets NR 720 industrial soil RCLs, land use is classified as industrial	NA
ix.	☐	☐	NA	Vapor Mitigation System (VMS) required due to exceedances of vapor risk screening levels or other health based concern	Yes
x.	☐	☐	NA	Vapor: Dewatering System needed for VMS to work effectively	Yes
xi.	☐	☐	NA	Vapor: Compounds of Concern in use: full vapor assessment could not be completed	NA
xii	☐	☐	NA	Vapor: Commercial/industrial exposure assumptions used.	NA
xiii.	☐	☐	☐	Vapor: Residual volatile contamination poses future risk of vapor intrusion	NA
xiv.	☐	☐	☐	Site-specific situation: (e. g., fencing, methane monitoring, other) (*discuss with project manager before submitting the closure request*)	Site specific

6. Underground Storage Tanks

A. Were any tanks, piping or other associated tank system components removed as part of the investigation or remedial action? ○ Yes ◉ No

B. Do any upgraded tanks meeting the requirements of ch. ATCP 93, Wis. Adm. Code, exist on the property? ○ Yes ◉ No

C. If the answer to question 6.B. is yes, is the leak detection system currently being monitored? ○ Yes ○ No

General Instructions

All information shall be legible. Providing illegible information will result in a submittal being considered incomplete until corrected. For each attachment (A-G), provide a Table of Contents page, listing all 'applicable' and 'not applicable' items by Closure Form titles (e.g., A.1. Groundwater Analytical Table, A.2. Soil Analytical Results Table, etc.). If any item is 'not applicable' to the case closure request, you must fully explain the reasons why.

Data Tables (Attachment A)

Directions for Data Tables:

- Use **bold** and italics font for information of importance on tables and figures. Use **bold** font for ch. NR 140, Wis. Adm. Code ES attainments or exceedances, and *italicized font* for ch. NR 140, Wis. Adm. Code, PAL attainments or exceedances.
- Use **bold** font to identify individual ch. NR 720 Wis. Adm. Code RCL exceedances. Tables should also include the corresponding groundwater pathway and direct contact pathway RCLs for comparison purposes. Cumulative hazard index and cumulative cancer risk exceedances should also be tabulated and identified on Tables A.2 and A.3.
- Do not use shading or highlighting on the analytical tables.
- Include on Data Tables the level of detection for results which are below the detection level (i.e., do not just list as no detect (ND)).
- Include the units on data tables.
- Summaries of all data must include information collected by previous consultants.
- Do not submit lab data sheets unless these have not been submitted in a previous report. Tabulate all data required in s. NR 716.15 (3)(c), Wis. Adm. Code, in the format required in s. NR 716.15(4)(e), Wis. Adm. Code.
- Include in Attachment A all of the following tables, in the order prescribed below, with the specific Closure Form titles noted on the separate attachments (e.g., Title: A.1. Groundwater Analytical Table; A.2. Soil Analytical Results Table, etc.).
- For required documents, each table (e.g., A.1., A.2., etc.) should be a separate Portable Document Format (PDF).

A. Data Tables

A.1. **Groundwater Analytical Table(s):** Table(s) showing the analytical results and collection dates for all groundwater sampling points (e.g., monitoring wells, temporary wells, sumps, extraction wells, potable wells) for which samples have been collected.

A.2. **Soil Analytical Results Table(s):** Table(s) showing **all** soil analytical results and collection dates. Indicate if sample was collected above or below the observed low water table (unsaturated versus saturated).

A.3. **Residual Soil Contamination Table(s):** Table(s) showing the analytical results of only the residual soil contamination at the time of closure. This table shall be a subset of table A.2 and should include only the soil sample locations that exceed an RCL. Indicate if sample was collected above or below the observed low water table (unsaturated versus saturated). Table A.3 is optional only if a total of fewer than 15 soil samples have been collected at the site.

A.4. **Vapor Analytical Table(s)**: Table(s) showing type(s) of samples, sample collection methods, analytical method, sample results, date of sample collection, time period for sample collection, method and results of leak detection, and date, method and results of communication testing.

A.5. **Other Media of Concern (e.g., sediment or surface water)**: Table(s) showing type(s) of sample, sample collection method, analytical method, sample results, date of sample collection, and time period for sample collection.

A.6. **Water Level Elevations:** Table(s) showing all water level elevation measurements and dates from all monitoring wells. If present, free product should be noted on the table.

A.7. **Other:** This attachment should include: 1) any available tabulated natural attenuation data; 2) data tables pertaining to engineered remedial systems that document operational history, demonstrate system performance and effectiveness, and display emissions data; and (3) any other data tables relevant to case closure not otherwise noted above. If this section is not applicable, please explain the reasons why.

Maps, Figures and Photos (Attachment B)

Directions for Maps, Figures and Photos:

- Provide on paper no larger than 11 x 17 inches, unless otherwise directed by the Department. Maps and figures may be submitted in a larger electronic size than 11 x 17 inches, in a PDF readable by the Adobe Acrobat Reader. However, those larger-size documents must be legible when printed.
- Prepare visual aids, including maps, plans, drawings, fence diagrams, tables and photographs according to the applicable portions of ss. NR 716.15(4), 726.09(2) and 726.11(3), (5) and (6), Wis. Adm. Code.
- Include all sample locations.
- Contour lines should be clearly labeled and defined.
- Include in Attachment B all of the following maps and figures, in the order prescribed below, with the specific Closure Form titles noted on the separate attachments (e.g., Title: B.1. Location Map; B.2. Detailed Site Map, etc).
- For the electronic copies that are required, each map (e.g., B.1.a., B.2.a, etc.,) should be a separate PDF.
- Maps, figures and photos should be dated to reflect the most recent revision.

B.1. Location Maps

B.1.a. **Location Map:** A map outlining all properties within the contaminated site boundaries on a United States Geological Survey (U.S.G.S.) topographic map or plat map in sufficient detail to permit easy location of all affected and/or adjacent parcels. If groundwater standards are exceeded, include the location of all potable wells, including municipal wells, within 1200 feet of the area of contamination.

B.1.b. **Detailed Site Map:** A map that shows all relevant features (buildings, roads, current ground surface cover, individual property boundaries for all affected properties, contaminant sources, utility lines, monitoring wells and potable wells) within the contaminated area. This map is to show the location of all contaminated public streets, and highway and railroad rights-of-way in relation to the source property and in relation to the boundaries of groundwater contamination attaining or exceeding a ch. NR 140 ES, and/or in relation to the boundaries of soil contamination attaining or exceeding a RCL. Provide parcel identification numbers for all affected properties.

B.1.c. **RR Sites Map:** From RR Sites Map (http://dnrmaps.wi.gov/sl/?Viewer=RR Sites) attach a map depicting the source property, and all open and closed BRRTS sites within a half-mile radius or less of the property.

B.2. Soil Figures

B.2.a. **Soil Contamination:** Figure(s) showing the location of **all** identified unsaturated soil contamination. Use a single contour to show the horizontal extent of each area of contiguous soil contamination that exceeds a soil to groundwater pathway RCL as determined under ch. NR 720.Wis. Adm. Code. A separate contour line should be used to indicate the horizontal extent of each area of contiguous soil contamination that exceeds a direct contact RCL exceedances (0-4 foot depth).

B.2.b. **Residual Soil Contamination:** Figure(s) showing only the locations of soil samples where unsaturated soil contamination remains at the time of closure (locations represented in Table A.3). Use a single contour to show the horizontal extent of each area of contiguous soil contamination that exceeds a soil to groundwater pathway RCL as determined under ch. NR 720 Wis. Adm. Code. A separate contour line should be used to indicate the horizontal extent of each area of contiguous soil contamination that exceeds a direct contact RCL exceedence (0-4 foot depth).

B.3. Groundwater Figures

B.3.a. **Geologic Cross-Section Figure(s):** One or more cross-section diagrams showing soil types and correlations across the site, water table and piezometric elevations, and locations and elevations of geologic rock units, if encountered. Display on one or more figures all of the following:

- Source location(s) and vertical extent of residual soil contamination exceeding an RCL. Distinguish between direct contact and the groundwater pathway RCLs.
- Source location(s) and lateral and vertical extent if groundwater contamination exceeds ch. NR 140 ES.
- Surface features, including buildings and basements, and show surface elevation changes.
- Any areas of active remediation within the cross section path, such as excavations or treatment zones.
- Include a map displaying the cross-section location(s), if they are not displayed on the Detailed Site Map (Map B.1.b.)

B.3.b. **Groundwater Isoconcentration:** Figure(s) showing the horizontal extent of the post-remedial groundwater contamination exceeding a ch. NR 140, Wis. Adm. Code, PAL and/or an ES. Indicate the date and direction of groundwater flow based on the most recent sampling data.

B.3.c. **Groundwater Flow Direction:** Figure(s) representing groundwater movement at the site. If the flow direction varies by more than 20° over the history of the site, submit two groundwater flow maps showing the maximum variation in flow direction.

B.3.d. **Monitoring Wells:** Figure(s) showing all monitoring wells, with well identification number. Clearly designate any wells that: (1) are proposed to be abandoned; (2) cannot be located; (3) are being transferred; (4) will be retained for further sampling, or (5) have been abandoned.

B.4. Vapor Maps and Other Media

B.4.a. **Vapor Intrusion Map:** Map(s) showing all locations and results for samples taken to investigate the vapor intrusion pathway in relation to residual soil and groundwater contamination, including sub-slab, indoor air, soil vapor, soil gas, ambient air, and communication testing. Show locations and footprints of affected structures and utility corridors, and/or where residual contamination poses a future risk of vapor intrusion.

B.4.b. **Other media of concern (e.g., sediment or surface water):** Map(s) showing all sampling locations and results for other media investigation. Include the date of sample collection and identify where any standards are exceeded.

B.4.c. **Other:** Include any other relevant maps and figures not otherwise noted above. (This section may remain blank).

B.5. Structural Impediment Photos: One or more photographs documenting the structural impediment feature(s) which precluded a complete site investigation or remediation at the time of the closure request. The photographs should document the area that could not be investigated or remediated due to a structural impediment. The structural impediment should be indicated on Figures B.2.a and B.2.b.

Documentation of Remedial Action (Attachment C)

Directions for Documentation of Remedial Action:

- Include in Attachment C all of the following documentation, in the order prescribed below, with the specific Closure Form titles noted on the separate attachments (e.g., Title: C.1. Site Investigation Documentation; C.2. Investigative Waste, etc.).
- If the documentation requested below has already been submitted to the DNR, please note the title and date of the report for that particular document requested.

C.1. **Site investigation documentation,** that has not otherwise been submitted with the Site Investigation Report.

C.2. **Investigative waste** disposal documentation.

C.3. Provide a **description of the methodology** used along with all supporting documentation if the RCLs are different than those contained in the Department's RCL Spreadsheet available at: http://dnr.wi.gov/topic/Brownfields/Professionals.html.

C.4. **Construction documentation** or as-built report for any constructed remedial action or portion of, or interim action specified in s. NR 724.02(1), Wis. Adm. Code.

C.5. **Decommissioning of Remedial Systems.** Include plans to properly abandon any systems or equipment.

C.6. **Other**. Include any other relevant documentation not otherwise noted above (This section may remain blank).

Maintenance Plan(s) and Photographs (Attachment D)

Directions for Maintenance Plans and Photographs:

Attach a maintenance plan for each affected property (source property, each off-source affected property) with continuing obligations requiring future maintenance (e.g., direct contact, groundwater protection, vapor intrusion). See Site Summary section 5 for all affected property(s) requiring a maintenance plan. Maintenance plan guidance and/or templates for: 1) Cover/barrier systems; 2) Vapor intrusion; and 3) Monitoring wells, can be found at: http://dnr.wi.gov/topic/Brownfields/Professionals.html#tabx3

D.1. **Descriptions of maintenance action(s) required for maximizing effectiveness of the engineered control, vapor mitigation system, feature or other action for which maintenance is required:**

- Provide brief descriptions of the type, depth and location of residual contamination.

- Provide a description of the system/cover/barrier/monitoring well(s) to be maintained.
- Provide a description of the maintenance actions required for maximizing effectiveness of the engineered control, vapor mitigation system, feature or other action for which maintenance is required.
- Provide contact information, including the name, address and phone number of the individual or facility who will be conducting the maintenance.

D.2. **Location map(s) which show(s):** (1) the feature that requires maintenance; (2) the location of the feature(s) that require(s) maintenance - on and off the source property; (3) the extent of the structure or feature(s) to be maintained, in relation to other structures or features on the site; (4) the extent and type of residual contamination; and (5) all property boundaries.

D.3. **Photographs** for site or facilities with a cover or other performance standard, a structural impediment or a vapor mitigation system, include one or more photographs documenting the condition and extent of the feature at the time of the closure request. Pertinent features shall be visible and discernible. Photographs shall be submitted with a title related to the site name and location, and the date on which it was taken.

D.4. **Inspection log**, to be maintained on site, or at a location specified in the maintenance plan or approval letter. The inspection and maintenance log is found at: http://dnr.wi.gov/files/PDF/forms/4400/4400-305.pdf.

Monitoring Well Information (Attachment E)

Directions for Monitoring Well Information:
For all wells that will remain in use, be transferred to another party, or that could not be located; attach monitoring well construction and development forms (DNR Form 4400-113 A and B: http://dnr.wi.gov/topic/groundwater/documents/forms/4400_113_1_2.pdf)

Select One:

◯ No monitoring wells were installed as part of this response action.

◉ All monitoring wells have been located and will be properly abandoned upon the DNR granting conditional closure to the site

◯ ***Select One or More:***

☐ Not all monitoring wells can be located, despite good faith efforts. Attachment E must include a description of efforts made to locate the wells.

☐ One or more wells will remain in use at the site after this closure. Attachment E must include documentation as to the reason (s) the well(s) will remain in use. When one or more monitoring wells will remain in use this is considered a continuing obligation and a maintenance plan will be required and must be included in Attachment D.

☐ One or more monitoring wells will be transferred to another owner upon case closure being granted. Attachment E should include documentation identifying the name, address and email for the new owner(s). Provide documentation from the party accepting future responsibility for monitoring well(s).

Source Legal Documents (Attachment F)

Directions for Source Legal Documents:
Label documents with the specific closure form titles (e.g., F.1. Deed, F.2. Certified Survey Map, etc.). Include all of the following documents, in the order listed:

F.1. **Deed:** The most recent deed with legal description clearly listed.

Note: *If a property has been purchased with a land contract and the purchaser has not yet received a deed, a copy of the land contract which includes the legal description shall be submitted instead of the most recent deed. If the property has been inherited, written documentation of the property transfer should be submitted along with the most recent deed.*

F.2. **Certified Survey Map:** A copy of the certified survey map or the relevant section of the recorded plat map for those properties where the legal description in the most recent deed refers to a certified survey map or a recorded plat map. In cases where the certified survey map or recorded plat map are not legible or are unavailable, a copy of a parcel map from a county land information office may be substituted. A copy of a parcel map from a county land information office shall be legible, and the parcels identified in the legal description shall be clearly identified and labeled with the applicable parcel identification number.

F.3. **Verification of Zoning**: Documentation (e.g., official zoning map or letter from municipality) of the property's or properties' current zoning status.

F.4. **Signed Statement:** A statement signed by the Responsible Party (RP), which states that he or she believes that the attached legal description(s) accurately describe(s) the correct contaminated property or properties. This section applies to the source property only. Signed statements for Other Affected Properties should be included in Attachment G.

Notifications to Owners of Affected Properties (Attachment G)

Directions for Notifications to Owners of Affected Properties:
Complete the table on the following page for sites which require notification to owners of affected properties pursuant to ch. 292, Wis. Stats. and ch. NR 725 and 726, Wis. Adm. Code. Personal information collected will be used for administrative purposes and may be provided to requesters to the extent required by Wisconsin's Open Records law [ss. 19.31- 19.39,Wis. Stats.]. The DNR's "Guidance on Case Closure and the Requirements for Managing Continuing Obligations" (PUB-RR-606) lists specific notification requirements http://dnr.wi.gov/files/PDF/pubs/rr/RR606.pdf.

State law requires that the responsible party provide a 30-day, written advance notification to certain persons prior to applying for case closure. This requirement applies if: (1) the person conducting the response action does not own the source property; (2) the contamination has migrated onto another property; and/or (3) one or more monitoring wells will not be abandoned. Use form 4400-286, Notification of Continuing Obligations and Residual Contamination, at http://dnr.wi.gov/files/PDF/forms/4400/4400-286.pdf

Include a copy of each notification sent and accompanying proof of delivery, i.e., return receipt or signature confirmation.

Include the following documents for each property, keeping each property's documents grouped together and labeled with the letter G and the corresponding ID number from the table on the following page. (Source Property documents should only be included in Attachment F):

- **Deed:** The most recent deed with legal descriptions clearly listed for all affected properties.
  Note: If a property has been purchased with a land contract and the purchaser has not yet received a deed, a copy of the land contract which includes the legal description shall be submitted instead of the most recent deed. If the property has been inherited, written documentation of the property transfer should be submitted along with the most recent deed.
- **Certified Survey Map:** A copy of the certified survey map or the relevant section of the recorded plat map for those properties where the legal description in the most recent deed refers to a certified survey map or a recorded plat map. In cases where the certified survey map or recorded plat map are not legible or are unavailable, a copy of a parcel map from a county land information office may be substituted. A copy of a parcel map from a county land information office shall be legible, and the parcels identified in the legal description shall be clearly identified and labeled with the applicable parcel identification number.
- **Verification of Zoning:** Documentation (e.g., official zoning map or letter from municipality) of the property's or properties' current zoning status.
- **Signed Statement:** A statement signed by the Responsible Party (RP), which states that he or she believes the attached legal description(s) accurately describe(s) the correct contaminated property or properties.

Notifications to Owners of Affected Properties (Attachment G)

							Reasons Notification Letter Sent:													
ID	Address of Affected Property	Parcel ID No.	Date of Receipt of Letter	Type of Property Owner	WTMX	WTMY	Residual Groundwater Contamination = or > ES	Residual Soil Contamination Exceeds RCLs	Monitoring Wells: Not Abandoned	Monitoring Wells: Continued Monitoring	Cover/Barrier/Engineered Control	Structural Impediment	Industrial RCLs Met/Applied	Vapor Mitigation System(VMS)	Dewatering System Needed for VMS	Compounds of Concern in Use	Commercial/Industrial Vapor Exposure Assumptions Applied	Residual Volatile Contamination Poses Future Risk of Vapor Intrusion	Site Specification Situation
A																				
B																				
C																				
D																				

Signatures and Findings for Closure Determination

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

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

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

Engineering Certification

I, Matthew R Van Patten, PE, hereby certify that I am a registered professional engineer in the State of Wisconsin, registered in accordance with the requirements of ch. A-E 4, Wis. Adm. Code; that this document has been prepared in accordance with the Rules of Professional Conduct in ch. A-E 8, Wis. Adm. Code; and that, to the best of my knowledge, all information contained in this document is correct and the document was prepared in compliance with all applicable requirements in chs. NR 700 to 726, Wis. Adm. Code.

Signature [signature] P. E. # 42532

Title Director P.E. Stamp

WISCONSIN MATTHEW VAN PATTEN E-42532 OLNEY, MD 8/27/21 PROFESSIONAL ENGINEER

Hydrogeologist Certification

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

Signature [signature]

Title Solutions Manager Date 31 Aug 2021

WISCONSIN BERND W. REHM G-537 MADISON WI PROFESSIONAL GEOLOGIST

Data Tables (Attachment A)

- A.1 Groundwater Analytical Tables
- A.2 Soil Analytical Tables
- A.3 Residual Soil Contamination Table (**Not enclosed, no soil contamination**)
- A.4 Vapor Analytical Tables
- A.5 Other media of Concern ***(Indoor Air)***
- A.6 Water Level Elevations
- A.7 (None)

A.1 - Groundwater Analytical Tables

Summary of Groundwater Data for Volatile Organic Compounds (VOCs)
EPA Method 8260B
Bright Cleaners - Franklin Centre
7249 South 76th Street, Franklin, Wisconsin

concentrations in milligrams per liter (μg/L)

Well Number	TW-1	TW-3	MW-1	Duplicate (MW-1)	Groundwater Quality Standards		Vapor Risk Screening
					Enforcement Standards	Preventative Action Limit	Commercial
Date Collected	8/31/2016		8/17/2017				
Acetone	< 3.1	**12**	< 3.1	< 3.1	9,000	1,800	95,000,000
Benzene	< 0.2	**0.24**	< 0.2	< 0.2	5	0.5	69
Bromodichloromethane	< 0.2	< 0.2	< 0.2	< 0.2	0.6	0.06	38
Bromoform	< 0.3	< 0.3	< 0.3	< 0.3	4.4	0.44	5,100
Bromomethane	< 2	< 2	< 2	< 2	10	1	73
2-Butanone	< 1.6	< 1.6	< 1.6	< 1.6	4,000	800	9,400,000
Carbon disulfide	< 0.3	**0.34**	< 0.3	< 0.3	1,000	200	5,200
Carbon tetrachloride	< 1	< 1	< 1	< 1	5	0.5	18
Chlorobenzene	< 0.2	< 0.2	< 0.2	< 0.2	100	20	1,700
Chloroethane	< 0.5	< 0.5	< 0.5	< 0.5	400	80	97,000
Chloroform	< 0.1	< 0.1	< 0.1	< 0.1	6	0.6	36
Chloromethane	< 0.3	< 0.3	< 0.3	< 0.3	30	3	1,100
Dibromochloromethane	< 0.2	< 0.2	< 0.2	< 0.2	60	6	NE
1,1-Dichloroethane	< 0.2	< 0.2	< 0.2	< 0.2	850	85	330
1,2-Dichloroethane	< 0.2	< 0.2	< 0.2	< 0.2	5	0.5	98
1,1-Dichloroethene	< 0.4	< 0.4	< 0.4	< 0.4	7	0.7	820
cis-1,2-Dichloroethene	< 0.2	< 0.2	< 0.2	< 0.2	70	7	NE
trans-1,2-Dichloroethene	< 0.5	< 0.5	< 0.5	< 0.5	100	20	NE
1,2-Dichloropropane	< 0.1	< 0.1	< 0.1	< 0.1	5	0.5	150
cis-1,3-Dichloropropene	< 0.2	< 0.2	< 0.2	< 0.2	0.4	0.04	210
trans-1,3-Dichloropropene	< 0.1	< 0.1	< 0.1	< 0.1	0.4	0.04	210
Ethylbenzene	< 0.3	< 0.3	< 0.3	< 0.3	700	140	150
2-Hexanone	< 0.2	< 0.2	< 0.2	< 0.2	NE	NE	34,000
4-Methyl-2-pentanone	< 0.7	< 0.7	< 0.7	< 0.7	500	50	2,300,000
Methylene Chloride	< 0.2	< 0.2	< 0.2	< 0.2	5	0.5	20,000
Methyl tertiary-butyl ether	< 0.3	< 0.3	< 0.3	< 0.3	60	12	20,000
Styrene	< 0.3	< 0.3	< 0.3	< 0.3	100	10	39,000
1,1,2,2-Tetrachloroethane	< 0.1	< 0.1	< 0.1	< 0.1	0.2	0.02	140
Tetrachloroethene	< 0.3	< 0.3	< 0.3	< 0.3	5	0.5	240
Toluene	< 0.4	< 0.4	< 0.4	< 0.4	800	160	81,000
1,1,1-Trichloroethane	< 0.2	< 0.2	< 0.2	< 0.2	200	40	31,000
1,1,2-Trichloroethane	< 0.1	< 0.1	< 0.1	< 0.1	5	0.5	26
Trichloroethene	< 0.3	< 0.3	< 0.3	< 0.3	5	0.5	22
Vinyl chloride	< 0.3	< 0.3	< 0.3	< 0.3	0.2	0.02	25
Xylenes (total)	< 1	< 1	< 1	< 1	2,000	400	1,600

Summary of Groundwater Data for Volatile Organic Compounds (VOCs)
EPA Method 8260B
Bright Cleaners - Franklin Centre
7249 South 76th Street, Franklin, Wisconsin

concentrations in milligrams per liter (µg/L)

Well Number	MW-2	MW-3	Trip Blank	Groundwater Quality Standards		Vapor Risk Screening
				Enforcement Standards	Preventative Action Limit	Commercial
Date Collected	8/17/2017					
Acetone	< 3.1	< 3.1	< 3.1	9,000	1,800	95,000,000
Benzene	< 0.2	< 0.2	< 0.2	5	0.5	69
Bromodichloromethane	< 0.2	< 0.2	< 0.2	0.6	0.06	38
Bromoform	< 0.3	< 0.3	< 0.3	4.4	0.44	5,100
Bromomethane	< 2	< 2	< 2	10	1	73
2-Butanone	< 1.6	< 1.6	< 1.6	4,000	800	9,400,000
Carbon disulfide	< 0.3	< 0.3	< 0.3	1,000	200	5,200
Carbon tetrachloride	< 1	< 1	< 1	5	0.5	18
Chlorobenzene	< 0.2	< 0.2	< 0.2	100	20	1,700
Chloroethane	< 0.5	< 0.5	< 0.5	400	80	97,000
Chloroform	< 0.1	< 0.1	< 0.1	6	0.6	36
Chloromethane	< 0.3	< 0.3	< 0.3	30	3	1,100
Dibromochloromethane	< 0.2	< 0.2	< 0.2	60	6	NE
1,1-Dichloroethane	< 0.2	< 0.2	< 0.2	850	85	330
1,2-Dichloroethane	< 0.2	< 0.2	< 0.2	5	0.5	98
1,1-Dichloroethene	< 0.4	< 0.4	< 0.4	7	0.7	820
cis-1,2-Dichloroethene	< 0.2	< 0.2	< 0.2	70	7	NE
trans-1,2-Dichloroethene	< 0.5	< 0.5	< 0.5	100	20	NE
1,2-Dichloropropane	< 0.1	< 0.1	< 0.1	5	0.5	150
cis-1,3-Dichloropropene	< 0.2	< 0.2	< 0.2	0.4	0.04	210
trans-1,3-Dichloropropene	< 0.1	< 0.1	< 0.1	0.4	0.04	210
Ethylbenzene	< 0.3	< 0.3	< 0.3	700	140	150
2-Hexanone	< 0.2	< 0.2	< 0.2	NE	NE	34,000
4-Methyl-2-pentanone	< 0.7	< 0.7	< 0.7	500	50	2,300,000
Methylene Chloride	< 0.2	< 0.2	< 0.2	5	0.5	20,000
Methyl tertiary-butyl ether	< 0.3	< 0.3	< 0.3	60	12	20,000
Styrene	< 0.3	< 0.3	< 0.3	100	10	39,000
1,1,2,2-Tetrachloroethane	< 0.1	< 0.1	< 0.1	0.2	0.02	140
Tetrachloroethene	< 0.3	< 0.3	< 0.3	5	0.5	240
Toluene	< 0.4	< 0.4	< 0.4	800	160	81,000
1,1,1-Trichloroethane	< 0.2	< 0.2	< 0.2	200	40	31,000
1,1,2-Trichloroethane	< 0.1	< 0.1	< 0.1	5	0.5	26
Trichloroethene	< 0.3	< 0.3	< 0.3	5	0.5	22
Vinyl chloride	< 0.3	< 0.3	< 0.3	0.2	0.02	25
Xylenes (total)	< 1	< 1	< 1	2,000	400	1,600

Summary of Groundwater Data for Volatile Organic Compounds (VOCs)
EPA Method 8260B
Bright Cleaners - Franklin Centre
7249 South 76th Street, Franklin, Wisconsin

concentrations in milligrams per liter (µg/L)

Well Number	MW-1	MW-2	MW-3	Trip Blank	Groundwater Quality Standards		Vapor Risk Screening
					Enforcement Standards	Preventative Action Limit	Commercial
Date Collected	12/22/2021						
cis-1,2-Dichloroethene	< 0.27	< 0.27	< 0.27	< 0.27	70	7	NE
trans-1,2-Dichloroethene	< 0.46	< 0.46	< 0.46	< 0.46	100	20	NE
Tetrachloroethene	< 0.33	< 0.33	< 0.33	< 0.33	5	0.5	240
Trichloroethene	< 0.26	< 0.26	< 0.26	< 0.26	5	0.5	22
Vinyl chloride	< 0.17	< 0.17	< 0.17	< 0.17	0.2	0.02	25

Notes:

Sample collected post-remediation

TW-3 = Temporary monitoring well

< = Not Detected: Concentration less than the indicated laboratory detection limit.

Detected concentrations are shown in **bold**.

NE = Remedial Objective not established.

Groundwater Quality Standards cited in Wisconsin Administrative Code NR 140.10 Table 1

Vapor Risk Screening Levels for groundwater with a commercial property use based on the U.S. EPA Vapor Intrusion Screening Level Calculator (Version 3.5.2, October 2017) with an excess lifetime cancer risk of 1 x 10^{-5} in accordance with Wisconsin Administrative Code NR 716

Concentrations in excess of GQSs and/or VRSLs are shaded yellow (none detected)

Exceeded GQSs and/or VRSLs are shaded green

A.2 - Soil Analytical Tables

Summary of Soil Data for
Volatile Organic Compounds (VOCs)
EPA Method 5035/8260B
Bright Cleaners - Franklin Centre
7249 South 76th Street, Franklin, Wisconsin

concentrations in milligrams per kilogram (mg/kg)

Boring Number	TW-1	TW-2	TW-3	Residual Contaminant Levels		
				Direct Contact		Soil to Groundwater
Sample Depth (feet bgs)	14	11	12	Non-Industrial	Industrial	
Date Collected	8/31/2016					
Acetone	**0.029**	< 0.0016	< 0.0018	63,400	100,000	1.8383
Benzene	**0.0018**	**0.00044**	**0.00045**	1.6	7.07	0.0026
Bromodichloromethane	< 0.00039	< 0.00028	< 0.00031	0.418	1.83	0.0002
Bromoform	< 0.00039	< 0.00028	< 0.00031	25.4	113	0.0012
Bromomethane	< 0.00049	< 0.00035	< 0.00039	9.6	43	0.0025
2-Butanone	< 0.0015	< 0.0011	< 0.0012	28,400	28,400	0.833
Carbon disulfide	**0.00019**	**0.00051**	< 0.00015	738	738	0.2959
Carbon tetrachloride	< 0.00029	< 0.00021	< 0.00023	0.916	4.03	0.0019
Chlorobenzene	< 0.00019	< 0.00014	< 0.00015	370	761	0.0679
Chloroethane	< 0.00039	< 0.00028	< 0.00031	2,120	2,120	0.1133
Chloroform	< 0.00019	< 0.00014	< 0.00015	0.454	1.98	0.0017
Chloromethane	< 0.00029	< 0.00021	< 0.00023	159	669	0.0078
Dibromochloromethane	< 0.00039	< 0.00028	< 0.00031	8.28	38.9	0.016
1,1-Dichloroethane	< 0.00029	< 0.00021	< 0.00023	5.06	22.2	0.2417
1,2-Dichloroethane	< 0.00058	< 0.00042	< 0.00046	0.652	2.87	0.0014
1,1-Dichloroethene	< 0.00029	< 0.00021	< 0.00023	320	1,190	0.0025
cis-1,2-Dichloroethene	< 0.00029	< 0.00021	< 0.00023	156	2,340	0.0206
trans-1,2-Dichloroethene	< 0.00029	< 0.00021	< 0.00023	1,560	1,850	0.0313
1,2-Dichloropropane	< 0.00039	< 0.00028	< 0.00031	0.406	1.78	0.0017
cis-1,3-Dichloropropene	< 0.00019	< 0.00014	< 0.00015	1,210	1,210	0.0001
trans-1,3-Dichloropropene	< 0.00029	< 0.00021	< 0.00023	1,510	1,510	0.0001
Ethylbenzene	**0.00026**	< 0.00007	< 0.000077	8.02	35.4	0.785
2-Hexanone	< 0.00078	< 0.00056	< 0.00062	237	1,760	NE
4-Methyl-2-pentanone	< 0.00029	< 0.00021	< 0.00023	2,450	2,450	0.1126
Methylene Chloride	**0.0019**	< 0.00056	< 0.00062	61.8	1,150	0.0013
Methyl tertiary-butyl ether	< 0.00019	< 0.00014	< 0.00015	63.8	282	0.0135
Styrene	< 0.00019	< 0.00014	< 0.00015	867	867	0.11
1,1,2,2-Tetrachloroethane	< 0.00019	< 0.00014	< 0.00015	0.81	3.6	0.0000782
Tetrachloroethene	< 0.00029	< 0.00021	< 0.00023	33	145	0.0023
Toluene	**0.0017**	**0.00046**	**0.00041**	818	818	0.5536
1,1,1-Trichloroethane	< 0.00019	< 0.00014	< 0.00015	640	640	0.0701
1,1,2-Trichloroethane	< 0.00049	< 0.00035	< 0.00039	1.59	7.01	0.0016
Trichloroethene	< 0.00019	< 0.00014	< 0.00015	1.3	8.41	0.0018
Vinyl chloride	< 0.00039	< 0.00028	< 0.00031	0.067	2.08	0.000069
Xylenes (total)	< 0.00039	< 0.00028	< 0.00031	260	260	1.98

A.2

Summary of Soil Data for
Volatile Organic Compounds (VOCs)
EPA Method 5035/8260B
Bright Cleaners - Franklin Centre
7249 South 76th Street, Franklin, Wisconsin

concentrations in milligrams per kilogram (mg/kg)

Boring Number	MW-1	MW-2	B-1	HA-1	HA-2	HA-3	SS-01	Residual Contaminant Levels		
								Direct Contact		Soil to Groundwater
Sample Depth (feet bgs)	4	6	2	2	2	2	2.5	Non-Industrial	Industrial	
Date Collected	8/11/2017			8/6/2019			1/11/2021			
1,1,1-Trichloroethane	< 0.00018	< 0.00017	< 0.00015	<0.0025	<0.0025	<0.0025	NT	640	640	0.0701
1,1,2,2-Tetrachloroethane	< 0.00018	< 0.00017	< 0.00015	<0.0038	<0.0038	<0.0038	NT	0.81	3.6	0.0000782
1,1,2-Trichloroethane	< 0.00045	< 0.00043	< 0.00037	<0.0024	<0.0024	<0.0024	NT	1.59	7.01	0.0016
1,1-Dichloroethane	< 0.00027	< 0.00026	< 0.00022	<0.0031	<0.0031	<0.0031	NT	5.06	22.2	0.2417
1,1-Dichloroethene	< 0.00027	< 0.00026	< 0.00022	<0.0026	<0.0026	<0.0026	NT	320	1,190	0.0025
1,2-Dichloroethane	< 0.00054	< 0.00052	< 0.00045	<0.00031	<0.00031	<0.00031	NT	0.652	2.87	0.0014
1,2-Dichloropropane	< 0.00036	< 0.00035	< 0.0003	<0.002	<0.002	<0.002	NT	0.406	1.78	0.0017
2-Butanone	**0.011**	**0.0040**	**0.0099**	NT	NT	NT	NT	28,400	28,400	0.833
2-Hexanone	< 0.00072	< 0.00069	< 0.0006	NT	NT	NT	NT	237	1,760	NE
4-Methyl-2-pentanone	< 0.00027	< 0.00026	< 0.00022	NT	NT	NT	NT	2,450	2,450	0.1126
Acetone	**0.075**	**0.025**	**0.064**	NT	NT	NT	NT	63,400	100,000	1.8383
Benzene	**0.0025**	**0.0021**	**0.0015**	<0.0021	<0.0021	<0.0021	NT	1.6	7.07	0.0026
Bromodichloromethane	< 0.00036	< 0.00035	< 0.0003	<0.0019	<0.0019	<0.0019	NT	0.418	1.83	0.0002
Bromoform	< 0.00036	< 0.00035	< 0.0003	<0.0062	<0.0062	<0.0062	NT	25.4	113	0.0012
Bromomethane	< 0.00045	< 0.00043	< 0.00037	<0.0046	<0.0046	<0.0046	NT	9.6	43	0.0025
Carbon disulfide	< 0.00018	< 0.00017	< 0.00015	NT	NT	NT	NT	738	738	0.2959
Carbon tetrachloride	< 0.00027	< 0.00026	< 0.00022	<0.0024	<0.0024	<0.0024	NT	0.916	4.03	0.0019
Chlorobenzene	< 0.00018	< 0.00017	< 0.00015	<0.0022	<0.0022	<0.0022	NT	370	761	0.0679
Chloroethane	< 0.00036	< 0.00035	< 0.0003	<0.0028	<0.0028	<0.0028	NT	2,120	2,120	0.1133
Chloroform	< 0.00018	< 0.00017	< 0.00015	<0.0025	<0.0025	<0.0025	NT	0.454	1.98	0.0017
Chloromethane	< 0.00027	< 0.00026	< 0.00022	**0.0044 J**	**0.0089 J**	**0.0084**	NT	159	669	0.0078
cis-1,2-Dichloroethene	< 0.00027	< 0.00026	< 0.00022	<0.0032	<0.0032	<0.0032	<0.0116	156	2,340	0.0206
cis-1,3-Dichloropropene	< 0.00018	< 0.00017	< 0.00015	<0.0043	<0.0043	<0.0043	NT	1,210	1,210	0.0001
Dibromochloromethane	< 0.00036	< 0.00035	< 0.0003	<0.0019	<0.0019	<0.0019	NT	8.28	38.9	0.016
Ethylbenzene	**0.0013**	**0.00088**	**0.0010**	<0.0026	<0.0026	<0.0026	NT	8.02	35.4	0.785
Methyl tertiary-butyl ether	< 0.00018	< 0.00017	< 0.00015	NT	NT	NT	NT	63.8	282	0.0135
Methylene Chloride	**0.0015**	< 0.00069	< 0.0006	<0.0021	<0.0021	<0.0021	NT	61.8	1,150	0.0013
Styrene	< 0.00018	< 0.00017	< 0.00015	<0.0091	<0.0091	<0.0091	NT	867	867	0.11
Tetrachloroethene	< 0.00027	< 0.00026	**0.00067**	<0.0037	<0.0037	<0.0037	<0.0211	33	145	0.0023
Toluene	**0.0044**	**0.0028**	**0.0028**	<0.0023	<0.0023	<0.0023	NT	818	818	0.5536
trans-1,2-Dichloroethene	< 0.00027	< 0.00026	< 0.00022	<0.0023	<0.0023	<0.0023	<0.0117	1,560	1,850	0.0313
trans-1,3-Dichloropropene	< 0.00027	< 0.00026	< 0.00022	<0.0016	<0.0016	<0.0016	NT	1,510	1,510	0.0001
Trichloroethene	< 0.00018	< 0.00017	**0.0010**	<0.0023	<0.0023	<0.0023	<0.02	1.3	8.41	0.0018
Vinyl chloride	< 0.00036	< 0.00035	< 0.0003	<0.0037	<0.0037	<0.0037	<0.011	0.067	2.08	0.000069
Xylenes (total)	**0.0025**	**0.0012**	**0.0014**	<0.0048	<0.0048	<0.0048	NT	260	260	1.98

Notes:

bgs = feet below ground surface

TW-2 = Soil boring

< = Not Detected: Concentration less than the indicated laboratory detection limit

Detected compounds are shown as **bold**

Sample collected post-remediation

NT = Not Tested

NE = Remedial Objective not established

RCLs (Non-Industrial Direct-Contact) = Residual Contaminant Levels per the U.S. EPA's Regional Screening Level Web-Calculator (updated March 2017) in accordance with Wisconsin Administrative Code NR 720

RCLs (Industrial Direct-Contact) = Residual Contaminant Levels per the U.S. EPA's Regional Screening Level Web-Calculator (updated March 2017) in accordance with Wisconsin Administrative Code NR 720

RCLs (Soil to Groundwater) = Soil to Groundwater Residual Contaminant Levels per the U.S. EPA Regional Screening Level Web-Calculator (updated June 2016) in accordance with Wisconsin Administrative Code NR 720

Concentrations in excess of RCLs are shaded yellow

Exceeded RCLs are shaded green

A.4 - Vapor Analytical Tables

Summary of Soil Gas Data for
Volatile Organic Compounds (VOCs)
EPA Method TO-15
Bright Cleaners - Franklin Centre
7249 South 76th Street, Franklin, Wisconsin

concentrations in micrograms per cubic meter ($\mu g/m^3$)

Sub-slab Sample Number	SV-1	SV-2	SV-3	SV-4	SV-5	SV-6	SV-7	SV-7	Sub-Slab Vapor Action Levels	Sub-Slab Vapor Action Levels
Date Collected	8/31/2016			8/14/2017			12/19/2018	6/28/2019	Residential	
Acetone	**82**	**140**	**100**	**16**	**14**	**5.3**	**49.2**	**27.7**	1,100,000	4,500,000
Benzene	**2.9**	**1.4**	**3.4**	**0.26**	**0.26**	**0.12**	**3.1**	**0.62**	120	520
Benzyl chloride	< 2.4	< 1.9	< 2.6	< 1.3	< 1.3	< 0.59	<1.9	<1.8	19	83
Bromodichloromethane	< 0.21	< 0.17	< 0.23	< 0.28	< 0.28	< 0.13	< 0.57	<0.56	25	110
Bromoform	< 0.25	< 0.2	< 0.28	< 0.41	< 0.41	< 0.19	< 2.2	<2.2	850	3,700
Bromomethane	**0.54**	**0.50**	**0.79**	**0.47**	< 0.37	**0.22**	**<0.35**	**<0.35**	170	730
1,3-Butadiene	< 0.13	< 0.11	< 0.14	< 0.42	< 0.42	< 0.19	< 0.20	<0.19	31	140
2-Butanone	**6.7**	**7.7**	**12**	**1.7**	< 0.99	**0.72**	**8.3**	**4.8**	170,000	730,000
Carbon disulfide	**0.50**	< 0.29	**0.48**	< 0.26	< 0.26	< 0.12	<0.34	0.68	24,000	100,000
Carbon tetrachloride	< 0.41	< 0.33	< 0.45	< 1.2	< 1.1	< 0.53	0.68	<0.65	4.7	680
Chlorobenzene	< 0.13	< 0.11	< 0.14	< 0.94	< 3.7	< 0.43	< 0.43	<0.42	1,700	7,300
Chloroethane	< 1.2	< 0.98	< 1.3	< 0.44	< 0.43	< 0.2	< 0.40	<0.40	350,000	1,500,000
Chloroform	**0.22**	**0.36**	**0.62**	< 0.22	< 0.22	**0.37**	**<0.30**	**<0.30**	41	180
Chloromethane	< 0.24	< 0.19	< 2.6	< 0.95	< 0.95	< 0.44	<0.24	<0.24	3,100	13,000
Cyclohexane	**2.5**	**1.3**	**4.6**	< 0.6	< 0.59	< 0.27	<0.55	<0.54	210,000	880,000
Dibromochloromethane	< 0.32	< 0.25	< 0.35	< 0.43	< 0.43	< 0.2	<1.1	<1.1	NE	NE
1,2-Dibromoethane	< 0.4	< 0.32	< 0.44	< 0.68	< 0.68	< 0.31	< 0.57	<0.56	1.6	6.8
1,1-Dichloroethane	< 0.09	< 0.073	< 0.1	< 0.14	< 0.14	< 0.066	< 0.35	<0.34	580	2,600
1,2-Dichlorobenzene	**0.42**	< 0.19	< 0.26	< 0.39	< 0.39	< 0.18	<0.77	<0.76	7,000	29,000
1,3-Dichlorobenzene	**1.9**	**1.1**	**4.9**	< 0.37	< 0.36	< 0.17	<0.94	<0.88	NE	NE
1,4-Dichlorobenzene	< 0.29	< 0.24	< 0.32	< 0.42	< 0.42	< 0.19	<1.6	<1.5	85	370
Dichlorodifluoromethane	**2.3**	**2.3**	**2.1**	**2.0**	**2.0**	**2.2**	**2.9**	**2.2**	3,500	15,000
1,2-Dichloroethane	< 0.21	< 0.17	< 0.23	< 0.38	< 0.68	< 0.18	< 0.23	<0.23	36	160
1,1-Dichloroethene	< 0.12	< 0.093	< 0.13	< 0.2	< 0.2	< 0.094	< 0.42	<0.42	7,000	29,000
cis-1,2-Dichloroethene	**1.7**	**18**	**32**	< 0.63	< 0.62	< 0.29	<0.34	0.78	NE	NE
trans-1,2-Dichloroethene	< 0.13	**0.15**	< 0.14	< 0.22	< 0.22	< 0.1	< 0.44	<0.67	NE	NE
1,2-Dichloropropane	< 0.15	< 0.12	< 0.16	< 0.7	< 0.69	< 0.32	< 0.36	<0.35	94	580
cis-1,3-Dichloropropene	< 0.25	< 0.2	< 0.27	< 0.44	< 0.44	< 0.2	< 0.47	<0.46	230	1,000
trans-1,3-Dichloropropene	< 0.28	< 0.23	< 0.32	< 3.7	< 3.7	< 1.7	< 0.68	<0.67	230	1,000
1,4-Dioxane	< 0.48	**2.7**	**2.4**	< 1.2	< 1.1	< 0.54	NT	NT	190	820
Ethyl acetate	< 0.33	< 0.27	< 0.37	< 1	< 1	< 0.48	<0.29	3.3	2,400	10,000
Ethylbenzene	**3.9**	**2.8**	**6.1**	< 0.26	< 0.26	< 0.12	3.1	0.91	370	1,600
4-Ethyltoluene	**1.4**	**0.91**	**1.6**	< 0.42	< 0.42	< 0.19	1.7	2.7	NE	NE
Freon-113	< 0.13	**0.57**	**0.59**	**0.31**	**0.62**	**0.57**	**< 0.87**	**<0.86**	1,000,000	730,000
Freon-114	< 0.46	< 0.37	< 0.51	< 0.29	< 0.29	< 0.13	< 0.68	<0.66	NE	NE
Heptane	**5.5**	**2.7**	**13**	< 0.28	< 0.28	< 0.13	3.6	<0.58	NE	NE
Hexachlorobutadiene	**0.74**	< 0.45	< 0.61	< 0.9	< 0.9	< 0.41	<3.1	<0.58	43	190
Hexane	**6.4**	**2.7**	**11**	< 0.5	< 0.5	< 0.23	3.7	4	24,000	100,000
2-Hexanone	**3.1**	**2.9**	**4.9**	< 2.1	< 2.1	< 0.97	<1.2	<1.1	1,000	4,400
Isopropyl alcohol	**310**	**110**	**65**	**50**	**36**	**0.64**	**70**	**63**	7,000	29,000
4-Methyl-2-pentanone	**12**	**6.1**	**9.4**	< 1.1	< 1.1	< 0.52	2.1	<0.79	100,000	440,000
Methylene Chloride	**0.96**	< 0.69	< 0.95	**4.0**	**3.8**	**2.0**	**3.3**	**21.9**	21,000	88,000
Methyl tertiary-butyl ether	**0.25**	**0.33**	**0.28**	< 0.17	< 0.17	< 0.076	<1.0	<1.0	3,600	16,000
Naphthalene	**2.8**	**1.8**	**4.1**	< 1.2	< 1.1	**0.59**	**5.6**	**<2.0**	28	120
Propene	**6.3**	**3.6**	**5.5**	**0.42**	< 0.39	**0.23**	**<0.22**	**<0.22**	100,000	440,000
Styrene	**0.78**	**0.32**	**0.54**	< 0.82	< 0.81	< 0.38	<0.53	4	35,000	150,000
1,1,2,2-Tetrachloroethane	< 0.22	< 0.18	< 0.24	< 0.38	< 0.38	< 0.18	< 0.45	<0.44	16	70
Tetrachloroethene	**12,000**	**44,000**	**1,900**	**2,400**	**520**	**26**	**67**	**1,290**	1,400	5,800
Tetrahydrofuran	**8.4**	**4.1**	**5.6**	< 1.1	< 1.1	< 0.52	<0.40	<0.40	70,000	290,000
Toluene	**81**	**46**	**47**	< 0.35	< 0.34	< 0.16	18.5	5	170,000	730,000
1,2,4-Trichlorobenzene	**1.9**	**0.96**	**1.1**	< 1.1	< 1.1	< 0.53	<5.8	<5.7	70	290
1,1,1-Trichloroethane	< 0.13	< 0.11	< 0.14	< 0.21	**0.88**	< 0.098	<0.48	<0.47	170,000	730,000
1,1,2-Trichloroethane	< 0.24	< 0.19	< 0.26	< 0.56	< 0.56	< 0.26	< 0.39	<0.38	7.0	29
Trichloroethene	**22**	**41**	**26**	**12**	**26**	< 0.15	1.7	18.9	70	290
Trichlorofluoromethane	**1.6**	**1.6**	**1.3**	**1.4**	**1.8**	**1.4**	**1.4**	**1.3**	NE	NE
1,2,4-Trimethylbenzene	**5.1**	**3.9**	**7.5**	**0.40**	< 0.22	**0.37**	**4.3**	**7**	240	8,800
1,3,5-Trimethylbenzene	**1.4**	**0.91**	**2.0**	< 0.28	< 0.27	< 0.13	1.7	2.6	NE	NE
Vinyl acetate	< 0.22	< 0.18	< 0.24	< 1.1	< 1.1	< 0.53	<0.42	<0.41	7,000	29,000
Vinyl chloride	< 0.099	< 0.08	< 0.11	< 0.18	< 0.17	< 0.081	<0.20	<0.19	56	930
m,p-Xylene	**8.8**	**6.0**	**12**	< 0.44	< 0.44	**0.24**	**12.3**	**3.2**	3,500	15,000
o-Xylene	**3.6**	**2.4**	**4.8**	< 0.23	< 0.22	**0.16**	**4.3**	**1.4**	3,500	15,000
Xylenes (total)	**12**	**8.5**	**17**	< 0.65	< 0.65	**0.41**	**16.6**	**4.6**	3,500	15,000

A.4

Summary of Soil Gas Data for
Volatile Organic Compounds (VOCs)
EPA Method TO-15
Bright Cleaners - Franklin Centre
7249 South 76th Street, Franklin, Wisconsin

concentrations in micrograms per cubic meter (µg/m^3)

Sub-slab Sample Number	SV-1	SV-4	SV-5	SV-6	SV-7	SV-8	Sub-Slab Vapor Action Levels	Sub-Slab Vapor Action Levels
Date Collected	1/11/2021						Residential	
cis-1,2-Dichloroethene	<0.22	<0.22	**0.93**	<0.2	<0.22	<0.22	NE	NE
trans-1,2-Dichloroethene	<0.21	<0.21	<0.2	<0.19	<0.21	<0.21	NE	NE
Tetrachloroethene	<0.49	**254**	**128**	**0.46**	<0.49	**61.6**	1,400	5,800
Trichloroethene	<0.25	**0.64**	**12.1**	<0.23	<0.25	<0.25	70	290
Vinyl chloride	<0.085	<0.085	<0.079	<0.076	<0.085	<0.083	56	930

Notes:

Samples collected post-remediatio

SV-2 = Sub-slab vapor sample

< = Not Detected: Concentration less than the indicated laboratory detection limit.

Detected concentrations are shown in **bold**.

NE = Remedial Objective not established.

Sub-Slab Vapor Action Levels for a commercial property use based on the U.S. EPA Vapor Instrusion Screening Level Calculator (Version 3.5.2, October 2017) with an excess lifetime cancer risk of 1 x 10^{-5} in accordance with Wisconsin Administrative Code NR 716

Concentrations in excess of Remediation Objectives are shaded yellow

Exceeded Remedial Objectives are shaded green

A.5 - Indoor/Outdoor Air Tables

Indoor /Outdoor Air Data for
Volatile Organic Compounds (VOCs)
EPA Method TO-15
Bright Cleaners - Franklin Centre
7249 South 76th Street, Franklin, Wisconsin

concentrations in micrograms per cubic meter ($\mu g/m^3$)

Air Sample Number	IA-1 (Inddor)	AA-01-Indoor	AA-02-Outdoor	Carcinogenic SL TR=1E-06 (ug/m3)	Noncarcinogenic SL THI=1 (ug or fibers/m3)
Date Collected	**6/28/2019**	**1/11/2021**	**1/11/2021**		
Acetone	32	NT	NT	NE	1.4E+05
Benzene	0.29	NT	NT	1.6E+00	1.3E+02
2-Butanone	3.8	NT	NT	NE	NE
Chloroform	0.87	NT	NT	5.3E-01	4.3E+02
Dichlorodifluoromethane	2.3	NT	NT	NE	4.4E+02
cis-1,2-Dichloroethene	NT	<0.22	<0.21	NE	NE
trans-1,2-Dichloroethene	NT	<0.21	<0.2	NE	NE
Ethanol	16700	NT	NT	NE	NE
Ethyl acetate	10.2	NT	NT	NE	3.1E+02
Methylene Chloride	13.8	NT	NT	1.2E+03	2.6E+03
2-Propanol	625	NT	NT	NE	NE
Tetrachloroethene	5.7	<0.49	<0.46	47	180
Toluene	1.4	NT	NT	NE	2.2E+04
Trichlorofluoromethane	1.2	NT	NT	NE	NE
Trichloroethene	<0.38	<0.25	<0.24	3	8.8
Vinyl chloride	<0.19	<0.085	<0.08	2.8	440
m&p-Xylene	2.3	NT	NT	NE	4.4E+02
o-Xylene	0.75	NT	NT	NE	4.4E+02

Notes:

< = Not Detected: Concentration less than the indicated laboratory detection limit.

Detected concentrations are shown in **bold**.

NE = Remedial Objective not established.

Concentrations in excess of Remediation Objectives are shaded yellow

Exceeded Remedial Objectives are shaded green

A.6 - Water Level Elevations

Groundwater Elevation Measurements
Franklin Centre
7249 South 76th Street, Franklin,
Wisconsin

Apex Project No.: PECO_2017-68

Well Number	Top of Casing Elevation (ft - MSL)	Well Depth (ft)	Screened Interval (ft)	Date	Depth to Groundwater (ft)	Groundwater Elevation (ft - MSL)	Difference (ft)
MW-1	768.70	19.5	9.5 to 19.5	August 14, 2017	11.88	756.82	--
				August 17, 2017	11.88	756.82	0.00
				September 12, 2017	12.05	756.65	-0.17
MW-2	768.95	19.5	9.5 to 19.5	August 14, 2017	11.96	756.99	--
				August 17, 2017	11.97	756.98	-0.01
				September 12, 2017	11.97	756.98	0.00
MW-3	769.31	15.0	5 to 15	August 14, 2017	8.40	760.91	--
				August 17, 2017	8.40	760.91	0.00
				September 12, 2017	8.54	760.77	-0.14

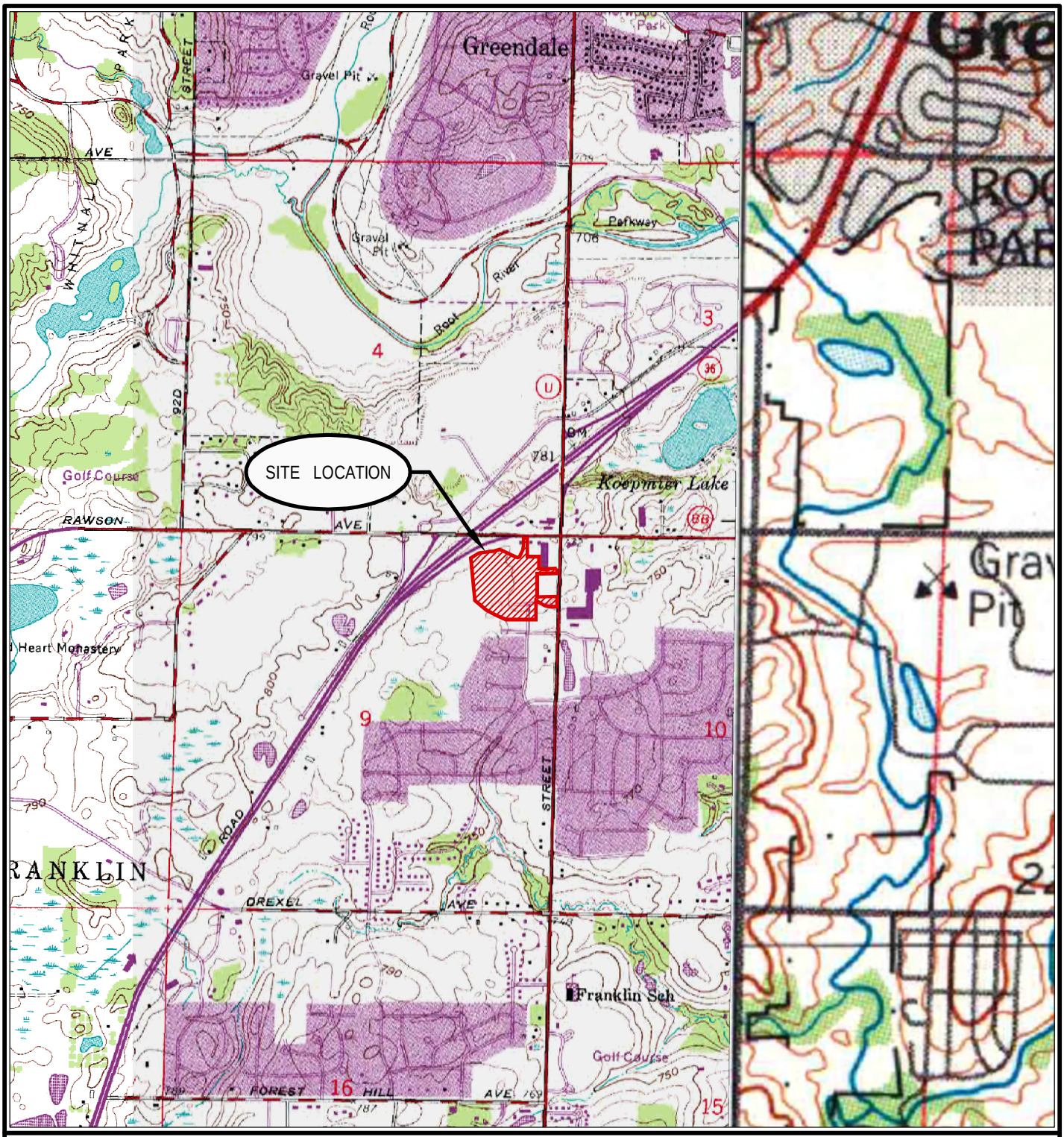
Notes: MSL - Mean Sea Level

Maps, Figures and Photos (Attachment B)

- B.1.a Location Map
- B1.b Detailed Site Map
- B.1.c RR Sites Map
- B.2.a Soil Contamination (**not enclosed, no soil contamination**)
- B.2.b Residual Soil Contamination ***(not attached,* no soil contamination*)***
- B.3.a Geological Cross Section
- B.3.b Groundwater Isoconcentration
- B.3.c Groundwater Flow Direction
- B.4.a Vapor Intrusion Map
- B.4.b Other media of concern ***(not attached, no other media identified)***

1. B.4.c Utility Drawing

- B.5 Structural Impediment Photos ***(not attached, no impediment)***



QUADRANGLE LOCATION

Scale 1:24000

0 1/2 1 MILE

1000 0 1000 2000 3000 FEET

(SOURCE OF MAP IS USGS 7.5 MINUTE QUADRANGLE MAP, HALES CORNERS (1994), WISCONSIN)

CHECK BY	JB
DRAWN BY	OS
DATE	11-1-18
SCALE	AS SHOWN
CAD NO.	PECO_2017.101C
PRJ NO.	PECO_2017.101

SITE LOCATION MAP

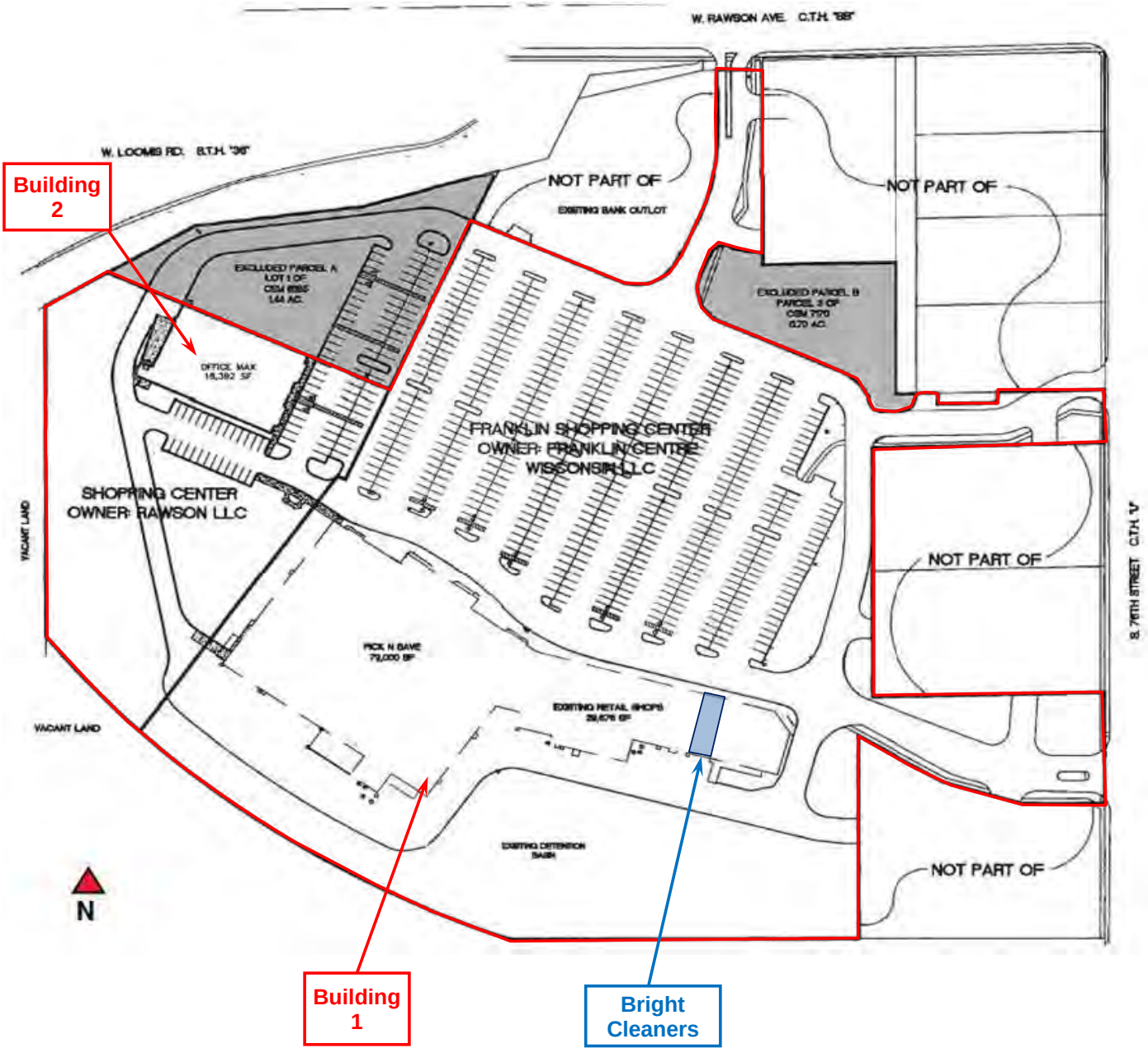
BRIGHT CLEANERS – FRANKLIN
7249 SOUTH 76th STREET
FRANKLIN, WISCONSIN

APEX

FIGURE

1

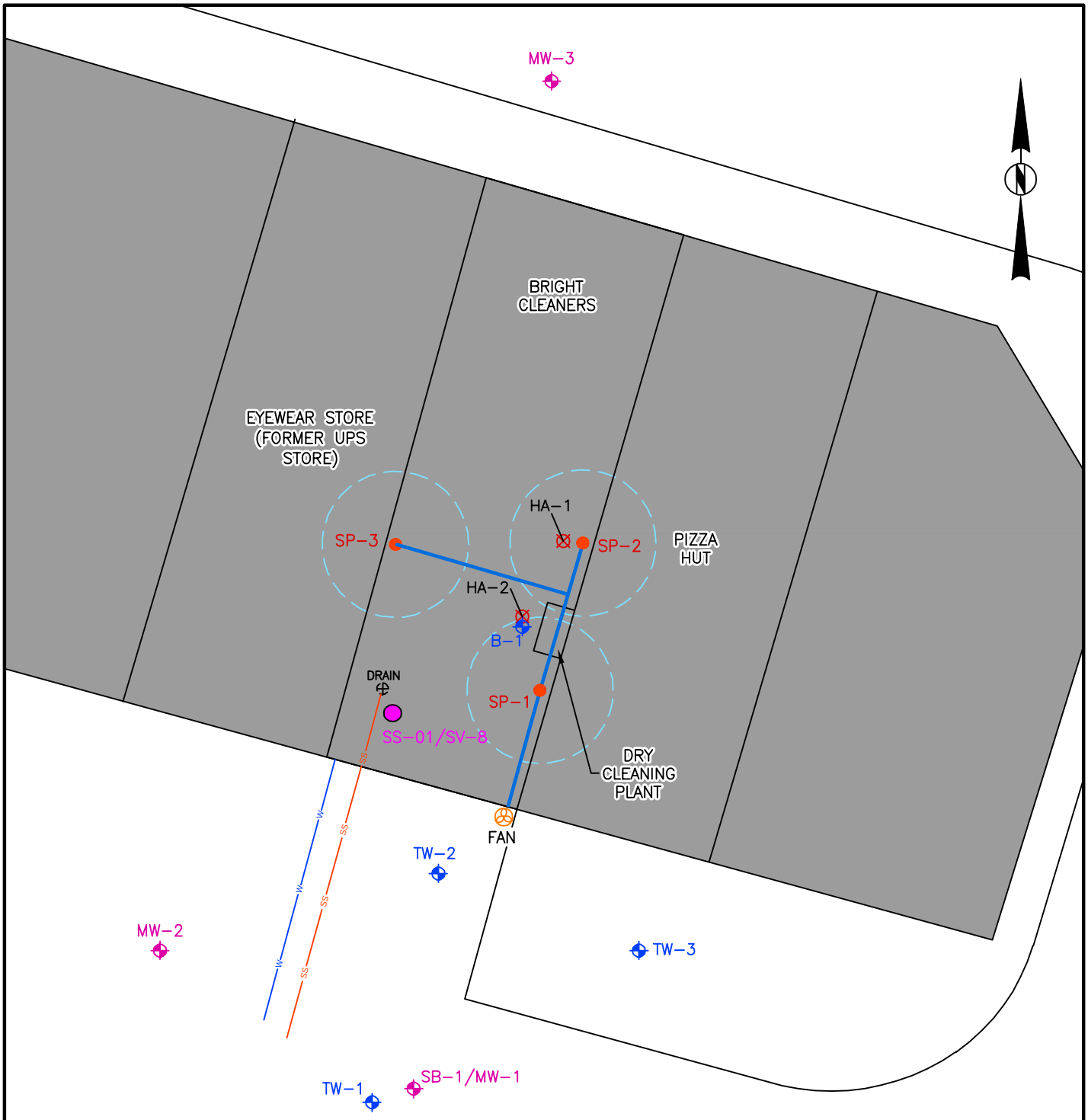
B.1.b - Detailed Site Map



Site Plan	Franklin Centre	
Figure 2 **Source:** Client	7201 South 76th Street Franklin, Milwaukee County, WI	155 Tri County Parkway Suite 250 Cincinnati, Ohio 45246 APEX

OPEN PANTRY
ONE HOUR MARTINIZING
BALLPARK COMMONS - WEST LOT 1 HISTORIC FILL
BALLPARK COMMONS - WEST LOT 2 HISTORIC FI
1
X: 682275.71611
Y: 273211.56136
BRIGHT CLEANERS
BRIGHT CLEANERS
BALLPARK COMMONS - LOT 3 HISTORIC FILL
8490 W OLD LOOMIS RD
BB
Terrace Drive
Lindner Drive
Foxden Court
Dover Hill Court
Bruin Drive
Cattle Drive North
Cattle Drive East
Cattle Circle South
Cattle Rustler Court
Stone Hedge Drive
Southampton Drive
West Old Loomis Road

B.2.a - Soil Sample Locations



CHECK BY	SN
DRAWN BY	OS
DATE	8-25-21
SCALE	AS SHOWN
CAD NO.	PECO_2017.101E
PRJ NO.	PECO_2017.101

SOIL SAMPLE LOCATIONS

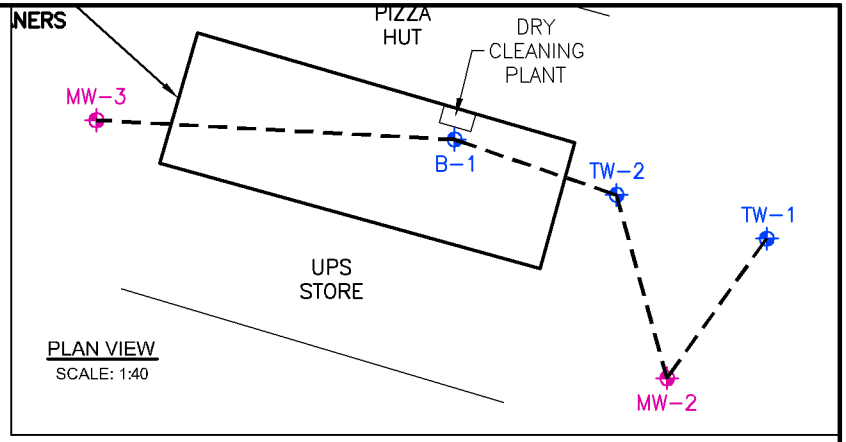
BRIGHT CLEANERS – FRANKLIN CENTRE
7249 SOUTH 76th STREET
FRANKLIN, WISCONSIN

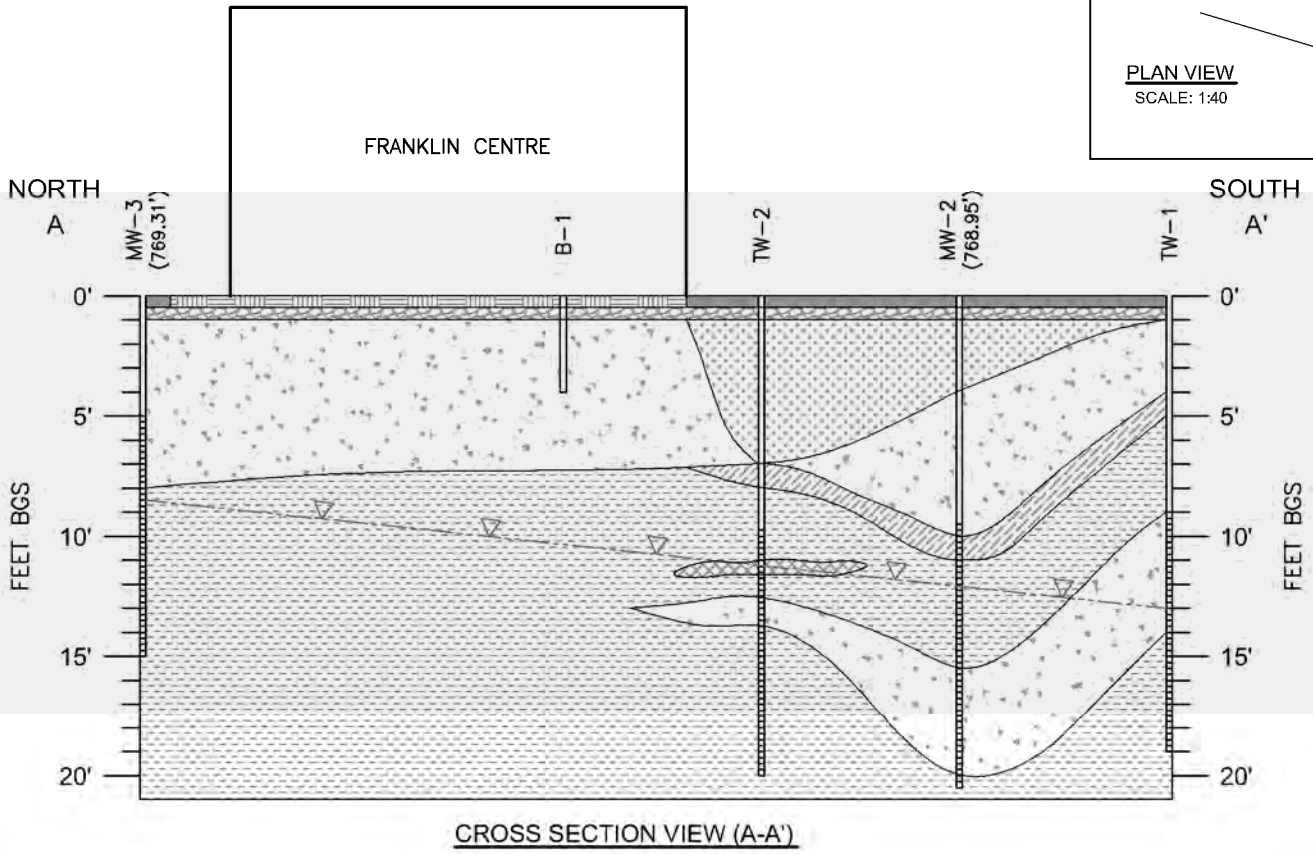
APEX

FIGURE

B.2.a

B.3.a - Geological Cross Section





SCALE IN FEET

0 4 8 16

LEGEND

- AGGREGATE
- ASPHALT
- CLAYEY SAND
- CLAYEY SILT
- CONCRETE
- FILL MATERIAL
- SILTY CLAY
- SILTY SAND
- GROUNDWATER ELEVATION MEASURED ON SEPTEMBER 15, 2017

CHK BY	JB
DWN BY	EM
DATE	10-23-17
SCALE	AS SHOWN
CAD NO.	PECO_2017-68
PRJ NO.	PECO.2017.68B

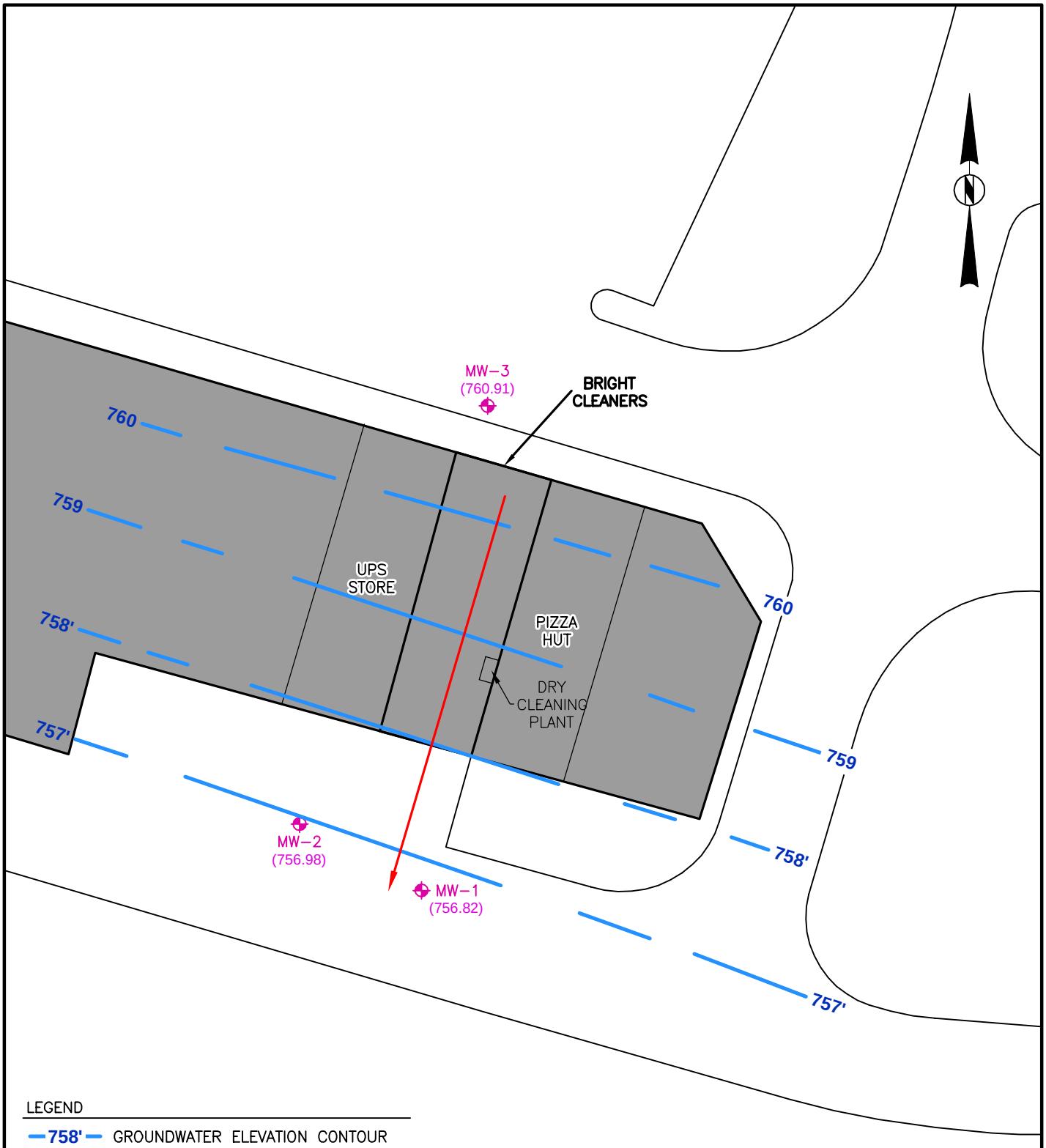
CROSS SECTION A-A'

BRIGHT CLEANERS - FRANKLIN
7249 SOUTH 76TH STREET
FRANKLIN, WISCONSIN

APEX

FIGURE 4

B.3.c - Groundwater Flow Direction



LEGEND

- 758' — GROUNDWATER ELEVATION CONTOUR
- (756.82) GROUDWATER ELEVATION AMSL
- MONITORING WELL LOCATIONS
- GROUNDWATER FLOW DIRECTION
- CONTOUR INTERVAL=1'

SCALE IN FEET

0 20 40 80

CHECK BY	JB
DRAWN BY	OS
DATE	08–30–17
SCALE	AS SHOWN
CAD NO.	PECO_2017.68A
PRJ NO.	PECO_2017.68

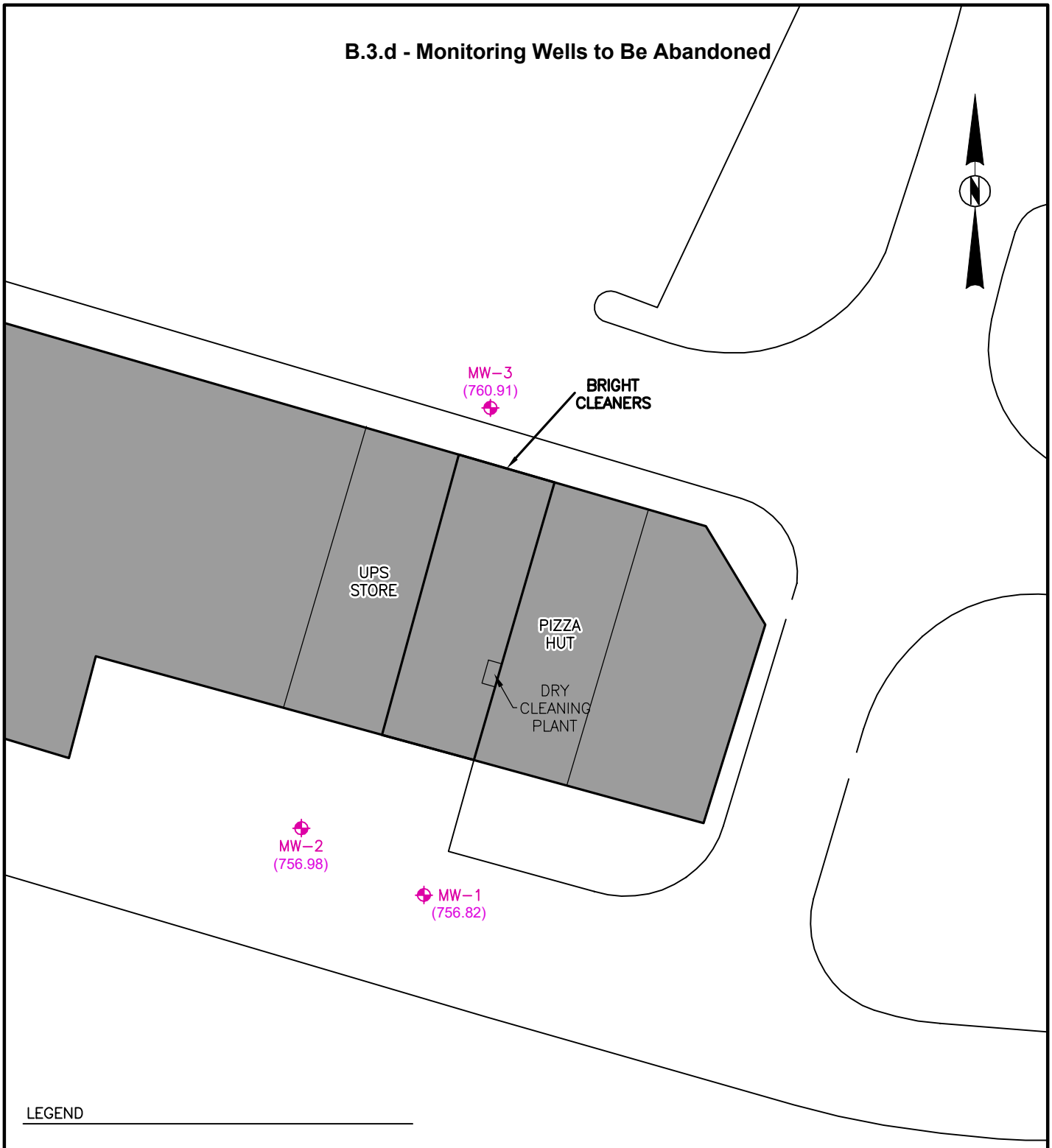
SITE DETAIL SHOWING GROUNDWATER CONTOUR LEVELS MEASURED ON AUGUST 17, 20016

BRIGHT CLEANERS – FRANKLIN CENTRE
7249 SOUTH 76th STREET
FRANKLIN, WISCONSIN

APEX

FIGURE
5

B.3.d - Monitoring Wells to Be Abandoned



LEGEND

(756.82)

Groundwater Monitoring Wells to be abandoned

SCALE IN FEET

0 20 40 80

CHECK BY	STN
DRAWN BY	OS
DATE	8-24-2021
SCALE	
CAD NO.	
PRJ NO.	

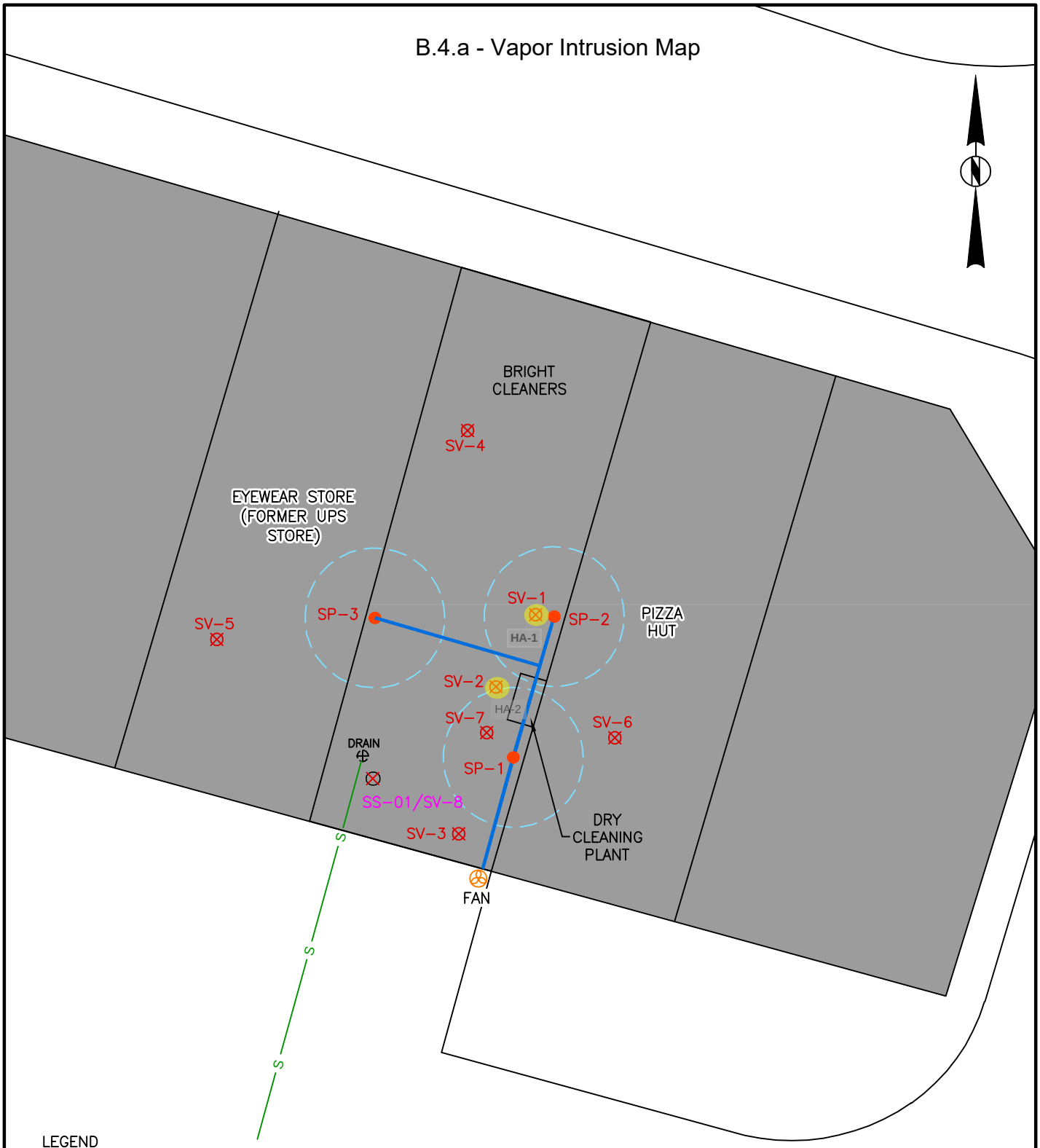
Groundwater Monitoring Wells to be Abandoned

Bright Cleaners
7201 South 76th Street
Franklin, Wisconsin

APEX

FIGURE

B.4.a - Vapor Intrusion Map



LEGEND

- SUCTION POINT
- SUB-SLAB VAPOR PROBE LOCATIONS
- VAPOR AND SOIL SAMPLE LOCATION
- SEWER LINE
- Hand Auger Locations

SCALE IN FEET

0 10 20 40

CHECK BY	SN
DRAWN BY	OS
DATE	2-8-21
SCALE	AS SHOWN
CAD NO.	PECO_2017.101A[3]
PRJ NO.	PECO_2017.101

SITE DETAIL SHOWING SAMPLE LOCATIONS

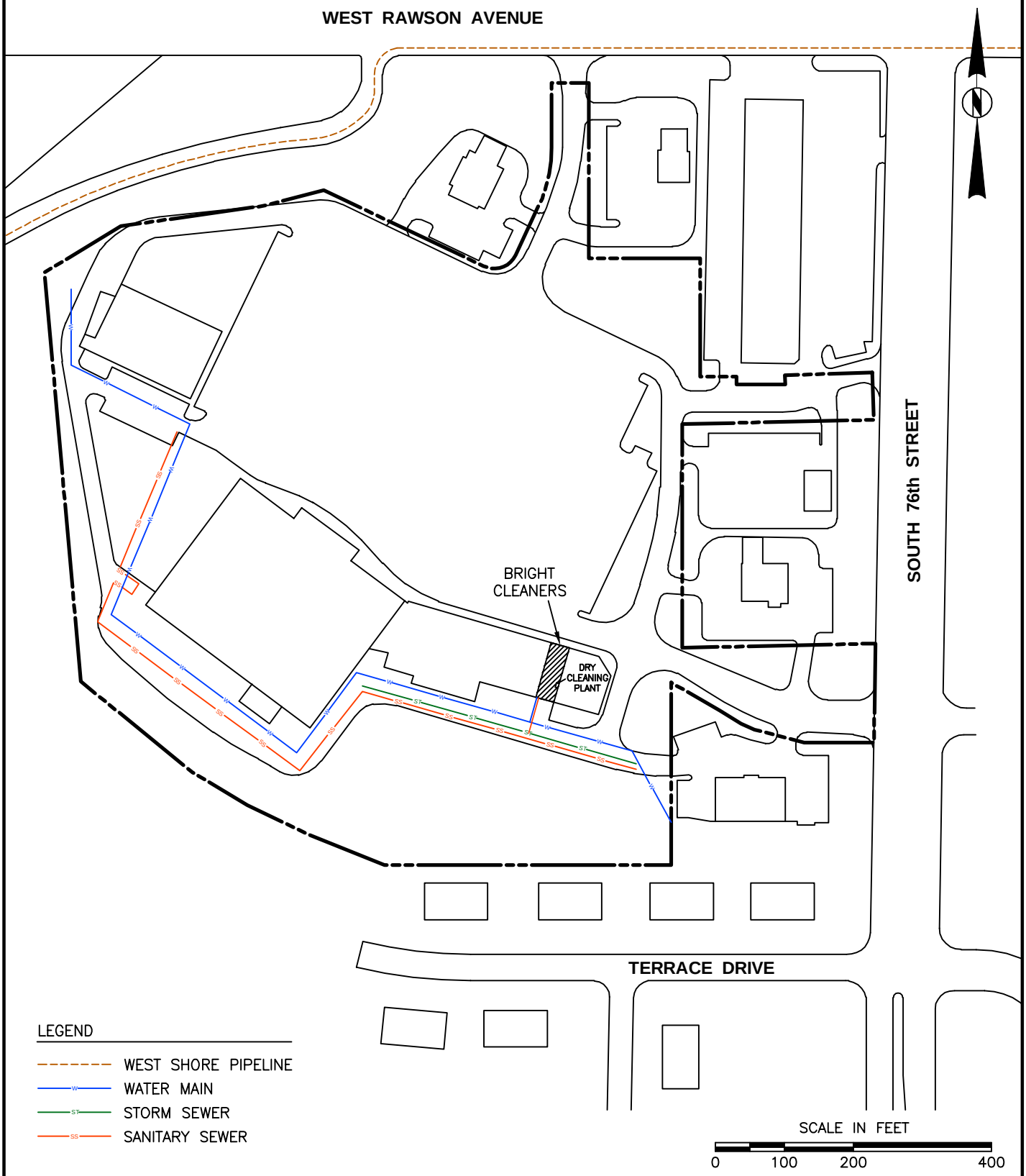
BRIGHT CLEANERS – FRANKLIN CENTRE
7249 SOUTH 76th STREET
FRANKLIN, WISCONSIN

APEX

FIGURE

3

B.4.c - Utility Drawing



CHECK BY	SN
DRAWN BY	OS
DATE	8-25-21
SCALE	AS SHOWN
CAD NO.	PECO_2017.101B
PRJ NO.	PECO_2017.101

UTILITY LOCATIONS

BRIGHT CLEANERS – FRANKLIN
7249 SOUTH 76th STREET
FRANKLIN, WISCONSIN

APEX

FIGURE
B.4.c

Documentation of Remedial Action (Attachment C)

- C.1 Site Investigation Documentation (**not attached, previously submitted in Additional Site Investigation Report dated 2-9-2021**)
- C.2 Investigative Waste **(not included, disposal of soil cuttings and development water was handled by tenant)**
- C.4 Construction documentation (**not attached, previously submitted in Bright SSDS Installation Report dated October 2018)**
- C.5 Decommissioning of Remedial System **(no attached, the owner would like to leave the system in-place for potential future use)**
- C.6 Other (**None**)

Maintenance Plans and Photographs (Attachment D) (not attached, system has remediated the site and therefore will not require maintenance)

Monitoring Well Information (Attachment E) (not attached, all monitoring wells installed for the investigation will be properly abandoned).

Source Legal Documents (Attachment F)

F.1 Deed
F.2.Certified Survey Map
F.3 Verification of Zoning
F.4 Signed Statement

F.1 - DEED

DOC # 10636979

RECORDED
01/03/2017 8:14 AM

JOHN LA FAVE
REGISTER OF DEEDS
Milwaukee County, WI
AMOUNT: 30.00
TRANSFER FEE: 36453.00
FEE EXEMPT #:
***This document has been electronically recorded and returned to the submitter. **

Document Number	Title
	SPECIAL WARRANTY DEED

Name and Return Address:

Tucker Ellis LLP
950 Main Avenue, Suite 1100
Cleveland, Ohio 44113
Attn: Keith H. Raker, Esq.

755-0192-003 and 755-1002-000
Parcel Identification Number

Knight-Barry File # 84224

4832-0427-2908.1

Document Number	Title **SPECIAL WARRANTY DEED**

ORIGINAL DOCUMENT
RECORDED ELECTRONICALLY
Date: 1/3/17
Doc. No. 10636979
Knight-Barry Title Group
www.knightbarry.com

Name and Return Address:

Tucker Ellis LLP
950 Main Avenue, Suite 1100
Cleveland, Ohio 44113
Attn: Keith H. Raker, Esq.

755-0192-003 and 755-1002-000
Parcel Identification Number

Knight-Barry File # 842224

EXHIBIT A
Legal Description

Parcel 1- Fee:

Parcel 1 of Certified Survey Map No. 7170 recorded in the Office of the Register of Deeds, Milwaukee County, Wisconsin on December 10, 2002 in Reel 5473, Images 3108 to 3112 inclusive, as Document No. 8405275, being a division of Parcel 1 and 2 of Certified Survey Map No. 5937, excepting therefrom those lands conveyed to Milwaukee County In Warranty Deed recorded on February 23,1999 in Reel 4505, Image 1260, as Document No. 7694071, and re-recorded on March 30, 2001 as Document No. 8043928 all being part of the Northeast 1/4 of the Northeast 1/4 of Section 9, Township 5 North, Range 21 East, in the City of Franklin, County of Milwaukee, State of Wisconsin..

FOR INFORMATION ONLY:
Tax Key No: 755-0192-003
Address: 7201 S. 76th Street

Parcel 2- Fee:

Lot 2 in CERTIFIED SURVEY MAP NO. 8385 recorded in the office of the Register of Deeds, Milwaukee County, Wisconsin on September 16, 2011 in Document No. 10033590, being a division of Parcel 2 of Certified Survey Map No. 7170, recorded in the Office of the Register of Deeds, Milwaukee County, Wisconsin on December 10, 2002 in Reel 5473, Images 3108 through 3112 inclusive, as Document No. 8405275, being a division of Parcel 1 and 2 of Certified Survey map No. 5937, excepting therefrom those lands conveyed to Milwaukee County in a Warranty Deed recorded on February 23, 1999 in Reel 4505, Image 1260, as Document No. 7694071, and re-recorded on March 30, 2001 as Document No. 8043928 all being part of the Northeast 1/4 of the Northeast 1/4 of Section 9, Township 5 North, Range 21 East, in the City of Franklin, County of Milwaukee, State of Wisconsin. FOR INFORMATION ONLY:

FOR INFORMATION ONLY:
Tax Key No: 755-1002-000
Address: 7199 South 76th Street

Parcel 3- Easement:

Non-exclusive easements as set forth in Declaration of Restrictions and Reciprocal Easement Agreement recorded April 16, 1993 in Reel 3014, Image 175 as Document No. 6753870, as affected by First Amendment to Declaration of Restrictions and Reciprocal Easement Agreement- recorded on November 12, 1993 in Reel 3161, Image 455, Document No. 6855991.

Parcel 4- Easement:

Non-exclusive easements as set forth in Declaration of Restrictions and Reciprocal Easement Agreement recorded on April 16, 1993 in Reel 3014, Image 1764, as Document No. 6753871.

Parcel 5- Easement:

Non-exclusive easements as set forth in Declaration of Restrictions and Reciprocal Easement Agreement recorded on April 28, 1994, in Reel 3277, Image 1186, Document No. 6941266, and the following amendments thereto: First Amendment to Declaration of Restrictions and Reciprocal Easement Agreement recorded as Document No. 8414223; Second Amendment to Declaration of Restrictions and Reciprocal Easement Agreement recorded as Document No. 9640805; Third

Amendment to Declaration of Restrictions and Reciprocal Easement Agreement recorded as Document No. 9793592.

Parcel 6- Easement:

Non-Exclusive ingress, egress and parking easement as set forth on Certified Survey Map No. 5937 for the benefit of Parcel 2.

ADDENDUM - EXHIBIT B
Permitted Exceptions

1. Real estate taxes for 2017 and subsequent years.
2. Special assessments, special taxes or special charges, if any, payable with the taxes levied or to be levied for 2017 and subsequent years.
3. Minerals of whatsoever kind, subsurface and surface substances, including but not limited to coal, lignite, oil, gas, uranium, clay, rock, sand and gravel in, on, under and that may be produced from the Land, together with all rights, privileges, and immunities relating thereto, whether or not appearing in the Public Records.
4. Title to and easements in, any portion of the land lying within any highways, road, street, or other ways.
5. Conservation Easement recorded as Document No. 10033849. (Affects Parcel 2).
6. Memorandum of Lease recorded as Document No. 6822438.
7. Development Agreement for Office Max recorded as Document No. 9662007. (Affects Parcel 2).
8. Utility Easement granted to Wisconsin Electric Power Company and Wisconsin Telephone Company recorded as Document No. 3490776 and re-recorded as Document No 3933552. Partial release of easement recorded as Document Nos. 6767794 and 6845369.
9. Reservation for public storm drainage easement set forth on plat of Whitnall Park Terrace Replat recorded as Document No. 6446195. (Affects Parcel 1).
10. Access Restrictions as set forth on plat of Franklin Plaza Subdivision recorded as Document No. 6753862 and Access Limitations in Award of Damages recorded as Document No. 6637983.
11. Setbacks, utility easements, storm water detention easements, ingress/egress easements, wetland buffer, reciprocal parking easement and conservation easement as set forth in Certified Survey Maps 5937, 7170and 8385.
12. Subdivision Development Agreement for Franklin Plaza recorded as Document No. 6753872.
13. Declaration of Restrictions and Reciprocal Easement Agreement recorded as Document No. 6753870 and First Amendment to Declaration of Restrictions and Reciprocal Easement Agreement recorded as Document No.6855991.
14. Declaration of Restrictions and Reciprocal Easement Agreement recorded as Document No. 6753871.
15. Utility Easement granted to Wisconsin Electric Power Company and Wisconsin Bell d/b/a Ameritech recorded as Document No. 6921579.
16. Utility Easement granted to Wisconsin Electric Power Company and Wisconsin Bell recorded as Document No. 6941264.
17. Declaration of Restrictions and Reciprocal Easement Agreement recorded as Document No. 6941266; First Amendment to Declaration of Restrictions and Reciprocal Easement Agreement recorded as Document No. 8414223; Second Amendment to Declaration of Restrictions and Reciprocal Easement Agreement recorded as Document No. 9640805; Third Amendment to Declaration of Restrictions and Reciprocal Easement Agreement recorded as Document No. 9793592.
18. Covenants, conditions and restrictions (but omitting any such covenant, condition or restriction based on race, color, religion, sex, handicap, familial status, or national origin, unless and only to the extent that covenant (a) is exempt under Chapter 42, Section 3607 of the United States Code, or (b) relates to handicap but does not discriminate against handicapped persons) set forth in Declaration of Restrictive Covenants recorded as Document No. 7058043.
19. Access Limitations as set forth in Award of Damages recorded as Document No. 4383196. (Affects Parcel 2).
20. Conditions and Restrictions contained in Resolution recorded as Document No. 8833836. (Affects Parcel 1).
21. Conditional Cross-Access Easement Agreement recorded as Document No.9639370.
22. Electric Conduit Easement Agreement recorded as Document No. 8664897. (Affects Parcel 1).
23. Storm Water Facilities Maintenance Agreement recorded as Document No. 9672110. (Affects Parcel 2).

State Bar of Wisconsin Form 6-2003

SPECIAL WARRANTY DEED

Document Number | Document Name

THIS DEED, made between FRANKLIN CENTRE WISCONSIN LLC, a Wisconsin limited liability company, and RAWSON LLC, a Wisconsin limited limited liability company ("Grantor," whether one or more), and FRANKLIN STATION LLC, a Delaware limited liability company ("Grantee," whether one or more).

Grantor for a valuable consideration, conveys to Grantee the following described real estate, together with the rents, profits, fixtures and other appurtenant interests, in Milwaukee County, State of Wisconsin ("Property") (if more space is needed, please attach addendum):

SEE ADDENDUM -- EXHIBIT A

Recording Area

Name and Return Address

Keith Raker, Esq.
Tucker Ellis, LLP
950 Main Avenue, Suite 1100
Cleveland, OH 44113

755-0192-003 & 755-1002-000

Parcel Identification Number (PIN)

This is not homestead property.
(is) (is not)

Grantor warrants that the title to the Property is good, indefeasible, in fee simple and free and clear of encumbrances arising by, through, or under Grantor, except:
those matters set forth on Addendum - Exhibit B hereto.

Dated December 19, 2016.

FRANKLIN CENTRE WISCONSIN LLC,
a Wisconsin limited liability company

(SEAL)
* Mark Lambert, Manager

(SEAL)
* Craig Whitehead, Manager

RAWSON LLC, a Wisconsin limited liability company

(SEAL)
* Mark Lambert, Manager

(SEAL)
* Craig Whitehead, Manager

AUTHENTICATION

Signature(s)

authenticated on

*

TITLE: MEMBER STATE BAR OF WISCONSIN
(If not, authorized by Wis. Stat. § 706.06)

THIS INSTRUMENT DRAFTED BY:
Steven B. Isaacson, The Crown Group, Inc.,
1564 W. Algonquin Rd., Hoffman Estates, IL 60192

ACKNOWLEDGMENT

STATE OF ~~WISCONSIN~~ ILLINOIS)
) ss.
~~MILWAUKEE~~ Cook COUNTY)

Personally came before me on December 19, 2016, the above-named Mark Lambert and Craig Whitehead, as Managers of Franklin Centre Wisconsin LLC and Rawson LLC to me known to be the person(s) who executed the foregoing instrument and acknowledged the same.

Janet S. Bickle
* Janet S. Bickle
Notary Public, State of ~~Wisconsin~~ Illinois
My Commission ~~(is permanent)~~ (expires: August 11, 2017)

OFFICIAL SEAL
JANET S BICKLE
NOTARY PUBLIC - STATE OF ILLINOIS
MY COMMISSION EXPIRES:08/11/17

(Signatures may be authenticated or acknowledged. Both are not necessary.)

NOTE: THIS IS A STANDARD FORM. ANY MODIFICATIONS TO THIS FORM SHOULD BE CLEARLY IDENTIFIED.

© 2003 STATE BAR OF WISCONSIN

* Type name below signatures.

24. Distribution Easement Gas-W.E. Area granted to Wisconsin Electric Power Company d/b/a We Energies recorded as Document No. 9680338.
25. Distribution Easement Underground Joint granted to Wisconsin Electric Power Company d/b/a We Energies, Wisconsin Bell, Inc., d/b/a AT&T Wisconsin and Time Warner Entertainment Company recorded as Document No. 9685389.
26. Water Main Easement recorded as Document No. 9751506.
27. Conditions and Restrictions contained in Resolution recorded as Document No. 10010301. (Affects Parcel 1).
28. Conditions and Restrictions contained in Resolution recorded as Document No. 10131208. (Affects Parcel 1).
29. Mortgage, Assignment of Leases and Rents and Security Agreement according to the terms and provisions thereof, from RAWSON LLC, a Wisconsin limited liability company to JPMORGAN CHASE BANK, NATIONAL ASSOCIATION to secure the originally indebtedness of $8,500,000.00 dated June 29, 2011 and recorded July 7, 2011 as Document No. 10012264 (Affects Parcel 2)
    The above-mentioned mortgage has been assigned by JPMORGAN CHASE BANK, NATIONAL ASSOCIATION to WELLS FARGO BANK, NATIONAL ASSOCIATION, AS TRUSTEE FOR THE REGISTERED HOLDERS OF J.P. MORGAN CHASE COMMERCIAL MORTGAGE SECURITIES TRUST 2011 C-5, COMMERCIAL MORTGAGE PASS-THROUGH CERTIFICATE SERIES 2011-C5 by an assignment dated September 29, 2011 and recorded November 21, 2011, as Document No.10055625.
    RAWSON LLC's interest as Borrower has been assigned to and assumed by FRANKLIN STATION LLC as reflected by a Memorandum of Consent and Assumption Agreement dated December __, 2016, and recorded _____, as Document No. _____.
30. Mortgage, Assignment of Leases and Rents and Security Agreement according to the terms and provisions thereof, from FRANKLIN CENTRE WISCONSIN LLC, a Wisconsin limited liability company to JPMORGAN CHASE BANK, NATIONAL ASSOCIATION to secure the originally stated indebtedness of $8,500,000.00 dated June 29, 2011 and recorded July 7, 2011 as Document No. 10012263.(Affects Parcel 1).
    The above-mentioned mortgage has been assigned by JPMORGAN CHASE BANK, NATIONAL ASSOCIATION to WELLS FARGO BANK, NATIONAL ASSOCIATION, AS TRUSTEE FOR THE REGISTERED HOLDERS OF J.P. MORGAN CHASE COMMERCIAL MORTGAGE SECURITIES TRUST 2011 C-5, COMMERCIAL MORTGAGE PASS-THROUGH CERTIFICATE SERIES 2011-C5 by an assignment dated September 29, 2011 and recorded November 21, 2011, as Document No. 10055633.
    Partial Release of Mortgage recorded as Document No. 10047373. (Certified Survey Map 8385 Lot 1).
    FRANKLIN CENTRE WISCONSIN LLC's interest as Borrower has been assigned to and assumed by FRANKLIN STATION LLC as reflected by a Memorandum of Consent and Assumption Agreement dated December __, 2016, and recorded _____, as Document No. _____.
31. Subordination, Nondisturbance and Attornment Agreement recorded as Document No. 10012266. (Affects Parcel 2).
32. Subordination, Nondisturbance and Attornment Agreement recorded as Document No. 10012265. (Affects Parcel 1).
33. Declaration of Restrictive Covenant recorded as Document No. 6941265 and Reel 3277, Image 1181, Milwaukee County, Wisconsin records.
34. Rights of tenants in possession including any rights to tenants fixtures owned by such tenants located on the demised premises and any liens on such tenants fixtures, and all parties having a lien on or claiming by, through or under the lessee, which parties and liens are not separately shown herein.
35. Matters as shown on ALTA NSPS Land title Survey prepared by Christian A. Husfeld, PLS 2492, Precision Land Surveying, Inc., on behalf of U.S. Surveyor, dated August 1, 2016, last revised _____, 2016, Job Number SS51118.DWG, as follows:
    a. Curb-cuts extend into the right-of-way of W. Rawson Avenue and S. 76th Street without the benefit of an easement;

b. Masonry Building on Parcel 2 abuts property line;
c. Wood Fence encroaches over easterly property line onto adjoiners property; and
d. Monument Sign encroachment into road right-of-way of West Rawson Avenue.

Electronic Real Estate Transfer Receipt

4GFHR

Wisconsin Department of Revenue

Instructions

1. Grantors and grantees must review this receipt, noting grantor and grantee responsibilities
2. Mail or deliver the following items:

Milwaukee County *Register of Deeds, 901 N 9TH ST, RM 103, MILWAUKEE, WI 53233-1458*

- This receipt page and a transfer fee of $36,453.00
- The deed or instrument of conveyance and a recording fee of $30.00 (regardless of the number of pages)

To view real estate transfer return details online, visit: https://ww2.revenue.wi.gov/RETRWebPublic/application. You will need your receipt number, total value of real estate transferred, and the last name of one grantor or grantee.

Receipt **4GFHR**. Filed December 27, 2016, 3:23 PM - **Milwaukee County**. Conveyance date **2016-12-28**.

Value transferred	**$12,151,000**	Transfer fee	**$36,453.00**
Value subject to fee	**$12,151,000**	Fee exemption number	

Grantors	Franklin Centre Wisconsin LLC; Rawson LLC
Grantees	Franklin Station LLC, a Delaware limited liability company
Tax bill address	Franklin Station LLC Attn: Treasurer, 11501 Northlake Dr., Cincinnati, Ohio 45429
Property Location	7201 S. 76th Street, Franklin, WI (**City of Franklin**)
Parcels	755-0192-003 (S9/T5N/R21E), 755-1002-000 (S9/T5N/R21E)
Legal description	Parcel 1: Parcel 1 of Certified Survey Map No. 7170 recorded in the Office of the Register of Deeds, Milwaukee County, Wisconsin on December 10, 2002 in Reel 5473, Images 3108 to 3112 inclusive, as Document No. 8405275, being a division of Parcel

Grantor responsibilities: Grantors are responsible for paying the proper fee amount—verify the total property value, fee amount and fee exemption before sending this receipt to the county Register of Deeds.

Grantee responsibilities: Grantees assert that this property is <u>not</u> a primary residence, and that the property is <u>not</u> subject to weatherization standards with exclusion code "W-7".

Preparer	Steven Isaacson, (847) 934-2525, steveisaacson@crowngroup.com
Grantor agent	Steven Isaacson, (847) 934-2525, steveisaacson@crowngroup.com
Grantee agent	Keith Raker, Tucker Ellis, LLP, 216-696-2468, keith.raker@tuckerellis.com

If you have questions on the Real Estate Transfer Return (RETR), visit the Wisconsin Department of Revenue's Real Estate Transfer Fee web page at: revenue.wi.gov/retr/index.html, or contact your County Register of Deeds. To locate your Register of Deeds, visit: wrdaonline.org.

Information on a real estate transfer return is used to administer various Wisconsin laws, including: income tax, real estate transfers, rental unit energy efficiency, lottery tax credit, and general property tax. Whether you are a resident, part-year resident, or non-resident, you must report the transfer of Wisconsin real estate in a taxable transaction on your Wisconsin income tax return. If you are a non-resident, you must file Form 1NPR to report the sale.

Penalties imposed under the following Wisconsin Statutes or Administrative Code:
Using an improper exemption - sec. 77.26(8), Wis. Stats.; falsifying the property value - sec. 77.27, Wis. Stats.; weatherization claim - sec. 101.122(7), Wis. Stats, ch. SPS367.08, Wis. Adm. Code; improperly claiming lottery and gaming credit as primary residence - chapter tax 20.12, Wis. Adm. Code.

F.2 - Certified Survey Map

ALTA/NSPS LAND TITLE SURVEY

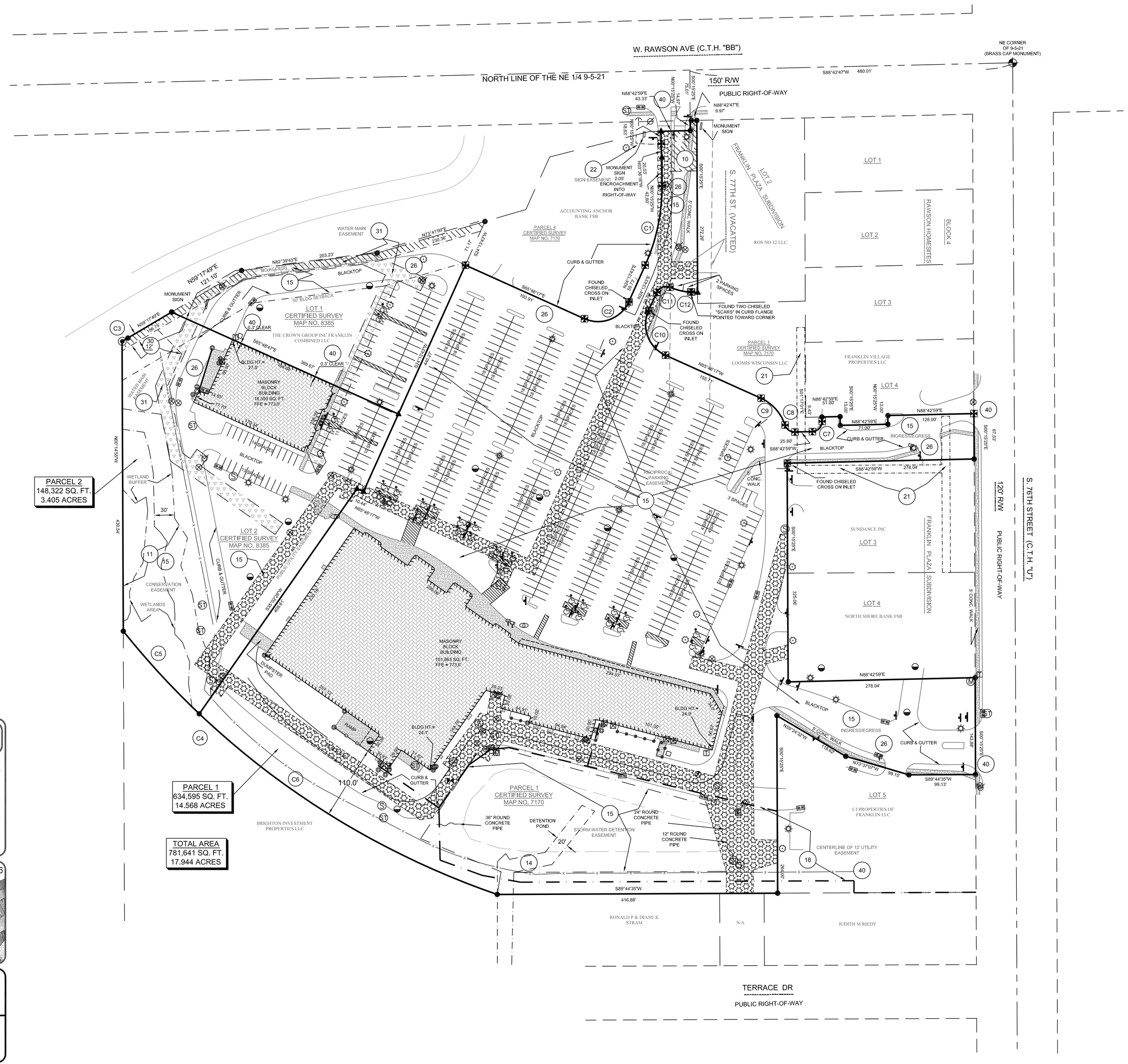
STANDARD LEGEND

- 1" IRON PIPE FOUND
- MAG NAIL FOUND
- 2" IRON PIPE FOUND
- CABLE TV PEDESTAL
- CHISELED CROSS FOUND
- CURB INLET
- ELECTRIC METER
- GAS METER
- GAS VALVE
- GUARD POST
- GUY WIRE
- HANDICAPPED PARKING
- HYDRANT
- ROUND INLET
- LIGHT POLE
- MAILBOX
- MISCELLANEOUS MANHOLE
- SAN. CLEANOUT VALVE
- SANITARY MANHOLE
- SECTION CORNER
- SIGN
- STORM MANHOLE
- TELEPHONE PEDESTAL
- UTILITY POLE
- UNKNOWN VALVE
- WATER VALVE

- CONCRETE
- BUILDING
- PUBLIC UTILITY EASEMENT
- WATERMAIN EASEMENT
- CHAIN LINK FENCE
- CULVERT
- METAL RAIL FENCE
- WOOD BOARD FENCE

SITE DATA

PARKING PROVIDED=
-REGULAR= 582 SPACES
-HANDICAP= 26 SPACES
TOTAL SPACES PROVIDED=608


W. RAWSON AVE (C.T.H. "BB")
NORTH LINE OF THE NE 1/4 9-5-21
NE CORNER OF 9-5-21 (BRASS CAP MONUMENT)
S88°42'47"W 480.01'
150' R/W
PUBLIC RIGHT-OF-WAY
N88°42'59"E 43.33'
N88°42'47"E 9.97'
MONUMENT SIGN
SIGN EASEMENT 2.00' ENCROACHMENT INTO RIGHT-OF-WAY
FRANKLIN PLAZA SUBDIVISION
LOT 2
S. 77TH ST. (VACATED)
LOT 1
LOT 2
LOT 3
BLOCK 4
RAWSON HOMESTEAD
ROS NO 12 LLC
ACCOUNTING ANCHOR BANK FSB
PARCEL 4 CERTIFIED SURVEY MAP NO. 7170
WATER MAIN EASEMENT
N23°41'09"E 236.36'
N59°17'40"E 121.10'
N82°39'43"E 203.23'
BOARD FENCE
BLACKTOP
CURB & GUTTER
MONUMENT SIGN
LOT 1 CERTIFIED SURVEY MAP NO. 8385
THE CROWN GROUP INC FRANKLIN COMBINED LLC
42.0' CLEAR
40
0.3' CLEAR
S65°58'47"E 369.67'
BLDG HT.= 27.0
MASONRY BLOCK BUILDING 68,399 SQ. FT. FFE = 773.0'
S65°58'47"E 153.97'
FOUND CHISELED CROSS ON INLET
FOUND TWO CHISELED "SCARS" IN CURB FLANGE POINTED TOWARD CORNER
PARCEL 1 CERTIFIED SURVEY MAP NO. 7170
LOOMIS WISCONSIN LLC
FRANKLIN VILLAGE PROPERTIES LLC
N65°36'17"W 155.7'
N65°48'17"W 153.8'
S65°48'17"E 153.97'
S65°58'47"E 153.97'
S65°58'47"E 153.97'
S65°58'47

City of Franklin
Department of City Development

December 22, 2016

John Stanton
CRE Zoning
24 N. High St., Ste 103
Akron, Ohio 44308

RE: 7199 and 7201-7263 South 76th Street, Tax Key Nos. 755-1002-000 and 755-0192-003

Dear Mr. Stanton,

The above referenced properties, 7199 South 76th Street and 7201-7263 South 76th Street are located within Planned Development District (PDD) No. 16. PDD No. 16 allows for commercial development in accordance with Ordinance No. 92-1229 and amendments thereto. The ordinances and other documentation regulating PDD No. 16 will be forwarded to you via email at zoning@cresurveys.com, as it is extensive.

According to Ordinance No. 92-1229, uses within the Pick 'N Save and retail building shall be consistent with the permitted and special uses in the B-3 Business District, as may be amended from time to time. The building, previously occupied by Office Max, on property located at 7199 S. 76th Street was approved via Resolution No. 2008-10. Department of City Development staff is not aware of any existing tenants that require additional zoning or occupancy approvals. Zoning Compliance Permits on file will be emailed to you. Occupancy Permits may be obtained through the Inspection Department, 414-425-0084/generalinspection@franklinwi.gov.

The surrounding zoning primarily consists of outlots that are also zoned PDD No. 16. A zoning map of this area is attached for your review.

The Department of City Development is not aware of any outstanding zoning code violations with respect to this property. Any violations discovered in the future will be subject to enforcement pursuant to the City of Franklin Unified Development Ordinance and Municipal Code.

If you have any further questions, please contact me at (414) 425-4024.

Sincerely,

Nicholas Fuchs
Principal Planner

F.4

Responsible Party Statement

I, Schawanda White, Risk Management Analyst of Phillips Edison & Company (Responsible Party), to the best of my knowledge believe the attached legal description and survey, describe the correct contaminated property for which a Case Closure is being requested.

Schawanda White

Signature

09/01/2021

Date

Notification (Attachment G) (Not attached, no off-site affected properties).