**State of Wisconsin**
**DEPARTMENT OF NATURAL RESOURCES**
**107 Sutliff Avenue**
**Rhinelander WI 54501-3349**

**Scott Walker, Governor**
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Telephone 608-266-2621
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WISCONSIN DEPT. OF NATURAL RESOURCES

file copy

October 24, 2012

201 Prospect Street, LLC
Attn: Mr. John W. Zich, Registered Agent
916 Maple Hill Road
Wausau, WI 54403

Subject: Reported Contamination at Hurd Windows & Doors (Fmr) – Dip Tank Area
201 S. Prospect Street, Merrill, WI
WDNR BRRTS Activity # 02-35-559460

Dear Mr. Zich:

On September 27, 2012, Ms. Donna Volk of AECOM submitted to the Wisconsin Department of Natural Resources (the Department) the Phase II Environmental Site Assessment (ESA) Report for the Former Hurd Millwork Co. Property, located at 201 South Prospect Street in Merrill. This Phase II ESA was conducted on behalf of the Department under the Wisconsin Plant Recovery Initiative (WPRI) Assessment Monies (WAM) Contractor Services Program. Contained within the report were data tables and figures indicating that volatile organic compounds (VOCs) and semi-volatile organic compounds (SVOCs) were detected above applicable standards in soil samples collected from the dip tank area inside one of the buildings located on the property. In addition, pentachlorophenol (PCP) was detected above the enforcement standard (ES) of 1 ug/l in a groundwater sample collected in this area. The attached Figure 2: Sample Location Diagram, shows the locations of GP-9, GP-10, GP-11, and GP-12, which were installed in the dip tank area. Also attached are tables which contain the soil and groundwater laboratory results.

Based on the information that has been submitted to the WDNR regarding this site, we believe you are responsible for investigating and restoring the environment at the above-described site under Section 292.11, Wisconsin Statutes, known as the hazardous substances spills law.

This letter describes the legal responsibilities of a person who is responsible under section 292.11, Wis. Stats., explains what you need to do to investigate and clean up the contamination, and provides you with information about cleanups, environmental consultants, possible financial assistance, and working cooperatively with the WDNR, Department of Safety and Professional Services (DSPS) or the Department of Agriculture, Trade and Consumer Protection (DATCP).

**Legal Responsibilities:**

Your legal responsibilities are defined both in statute and in administrative codes. The hazardous substances spill law, Section 292.11 (3) Wisconsin Statutes, states:

- RESPONSIBILITY. A person who possesses or controls a hazardous substance which is discharged or who causes the discharge of a hazardous substance shall take the actions necessary to restore the environment to the extent practicable and minimize the harmful effects from the discharge to the air, lands, or waters of the state.

Wisconsin Administrative Code chapters NR 700 through NR 749 establish requirements for emergency and interim actions, public information, site investigations, design and operation of remedial action systems, and case closure. Wisconsin Administrative Code chapter NR 140 establishes groundwater standards for contaminants that reach groundwater.

**Steps to Take:**

The longer contamination is left in the environment, the farther it can spread and the more it may cost to clean up. Quick action may lessen damage to your property and neighboring properties and reduce your costs in investigating and cleaning up the contamination. To ensure that your cleanup complies with Wisconsin's laws and administrative codes, you should hire a professional environmental consultant who understands what needs to be done. These are the first steps to take:

1. Within the next **30 days,** by November 24, 2012, you should submit written verification (such as a letter from the consultant) that you have hired an environmental consultant. If you do not take action within this time frame, the WDNR may initiate enforcement action against you.

2. Within the next **60 days,** by December 24, 2012, your consultant should submit a work plan and schedule for the investigation. The consultant must comply with the requirements in the NR 700 Wis. Adm. Code rule series and should adhere to current WDNR technical guidance documents.

In addition, within 30 days of completion of the site investigation, your consultant should submit a Site Investigation Report to the WDNR or other agency with administrative authority.

For sites with petroleum contamination, when your investigation has established the degree and extent of contamination, your consultant will be able to determine whether the Department of Safety and Professional Services or the WDNR has authority over the case. For agrichemicals, your case will be transferred to the Department of Agriculture, Trade and Consumer Protection for oversight.

Sites where discharges to the environment have been reported are entered into the Bureau for Remediation and Redevelopment Tracking System ("BRRTS"), a version of which appears on the WDNR's internet site. You may view the information related to your site at any time (http://**dnr.wi.gov/botw/**SetUpBasicSearchForm.do) and use the feedback system to alert us to any errors in the data.

If you want a formal written response from the department on a specific submittal, please be aware that a review fee is required in accordance with ch. NR 749, Wis. Adm. Code. If a fee is not submitted with your reports, you should proceed under the advice of your consultant to complete the site investigation and cleanup to maintain your compliance with the spills law and chapters NR 700 through NR 749. **Do not delay the investigation of your site by waiting for an agency response.** We have provided detailed technical guidance to environmental consultants. Your consultant is expected to know our technical procedures and administrative rules and should be able to answer your questions on meeting cleanup requirements.

All correspondence regarding this site should be sent to:

Brenda S. Halminiak
Remediation and Redevelopment Program
Wisconsin Department of Natural Resources
107 Sutliff Avenue
Rhinelander, WI 54501
Brenda.Halminiak@Wisconsin.gov

Unless otherwise requested, please send only one copy of plans and reports. In addition to the paper copy, an electronic copy may also be submitted. To speed processing, correspondence should reference the BRRTS and FID numbers (if assigned) shown at the top of this letter.

**Site Investigation and Vapor Pathway Analysis**

As you develop the site investigation work plan, we want to remind you to include an assessment of the vapor intrusion pathway. Chapter NR 716, Wisconsin Administrative Code outlines the requirements for investigation of contamination in the environment. Specifically, s. NR 716.11(3)(a) requires that the field investigation determine the "nature, degree and extent, both areal and vertical, of the hazardous substances or environmental pollution in all affected media". In addition, section NR 716.11(5) specifies that the field investigation include an evaluation of the "pathways for migration of the contamination, including drainage improvements, utility corridors, bedrock and permeable material or soil along which vapors, free product or contaminated water may flow".

You will need to include documentation with the Site Investigation Report that explains how the assessment was done. If the pathway is being ruled out, then the report needs to provide the appropriate justification for reaching this conclusion. If the pathway cannot be ruled out, then investigation and, if appropriate, remedial action must be taken to address the risk presented prior to submitting the site for closure. The WDNR has developed guidance to help responsible parties and their consultants comply with the requirements described above. The guidance includes a detailed explanation of how to assess the vapor intrusion pathway and provides criteria which identify when an investigation is necessary. The guidance is available at: http://dnr.wi.gov/files/PDF/pubs/rr/RR800.pdf.

**Additional Information for Site Owners:**
We encourage you to visit our website at http://dnr.wi.gov/topic/Brownfields/, where you can find information on selecting a consultant, financial assistance and understanding the cleanup process. You will also find information there about liability clarification letters, post-cleanup liability and more.

If you have questions, call the DNR Project Manager, Brenda S. Halminiak, at 715-365-8929 for more information or visit the RR web site at the address above.

Thank you for your cooperation.

Sincerely,

Brenda S. Halminiak

Brenda S. Halminiak, P.G.
Hydrogeologist
Remediation & Redevelopment Program

Cc: Mr. Jerry Wood

Attachments: Figure 2 – Sample Location Diagram
Table 1 – Soil Analytical Results

AECOM
1555 N RiverCenter Drive
Suite 214, Milwaukee, WI 53212
T 414.944.6080
www.aecom.com

SAMPLE LOCATION DIAGRAM
WPRI – PHASE II ENVIRONMENTAL SITE ASSESSMENT
FORMER HURD MILLWORK FACILTY
201 S. PROSPECT ST
MERRILL, WISCONSIN

| | | |
|---|---|---|
| Drawn: | DWF | 9-4-2012 |
| Checked: | DMV | 9-4-2012 |
| Approved: | KLB | 9-2012 |
| PROJECT NUMBER | 60267701 | |
| FIGURE NUMBER | 2 | |

TABLE 1
Soil Analytical Results - Phase II Environmental Site Assessment
Former Hurd Millwork
Merrill, Wisconsin
Project No. 60267701

| Parameters | Generic RCLs: Direct Contact Pathway, Non-Industrial | Direct Contact Pathway, Industrial | Volatile Inhalation, Non-Industrial | Volatile Inhalation, Industrial | Groundwater Pathway | 7/30/2012 HF-SS-GP-1 3'-4' | 7/30/2012 HF-SS-GP-1 14'-15' | 7/30/2012 HF-SS-GP-2 3'-4' | 7/30/2012 HF-SS-GP-3 3'-4' | 7/30/2012 HF-SS-GP-3 (Dupl.) 3'-4' | 7/30/2012 HF-SS-GP-4 3'-4' | 7/30/2012 HF-SS-GP-4 6'-7' | 7/31/2012 HF-SS-GP-5 2'-4' | 7/31/2012 HF-SS-GP-5 9'-10' | 7/31/2012 HF-SS-GP-6 2'-4' | 7/31/2012 HF-SS-GP-6 10'-11' | 7/31/2012 HF-SS-GP-7 3'-4' | 7/31/2012 HF-SS-GP-7 10'-12' | 7/30/2012 HF-SS-GP-8 5'-6' | 7/30/2012 HF-SS-GP-9 2'-4' | 7/30/2012 HF-SS-GP-10 7'-8' |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| PID/FID | -- | -- | | | -- | 0.2 | 0.4 | 2.0 | 2.6 | 2.6 | 1.0 | 0.6 | 0.0 | 0.5 | 1.2 | 0.0 | 1.7 | 0.5 | 1.8 | 1,349 | 763 |
| RCRA Metals (mg/kg) | | | | | | | | | | | | | | | | | | | | | |
| Arsenic | 0.039 D | 1.6 D | -- | -- | 0.58 | 2.5 | NA | 8.4 | 1.8 J | 2.2 J | 2.6 | NA | NA | NA | 2 | 1.3 J | 3.1 | NA | 2.4 | NA | NA |
| Barium | 3,130 | 240,000 | -- | -- | 330 | 47.7 | NA | 194 | 46.9 | 69.2 | 187 | NA | NA | NA | 68.6 | 23.8 | 31.0 | NA | 195 | NA | NA |
| Cadmium | 8 D | 510 D | -- | -- | 1.5 | 0.039 J | NA | <0.032 | 0.23 J | 0.12 J | <0.032 | NA | NA | NA | <0.039 | <0.032 | <0.032 | NA | <0.031 | NA | NA |
| Chromium | 18,000 D | -- | -- | -- | 3.8 | 15.8 | NA | 32.3 | 16.5 | 15.6 | 24.7 | NA | NA | NA | 17.7 | 10.8 | 28.6 | NA | 28 | NA | NA |
| Copper | -- | -- | -- | -- | 2,200 | 12.5 | NA | 18.3 | 20.1 | 18.7 | 24.1 | NA | NA | NA | 14.1 | 11.6 | 30.4 | NA | 19.3 | NA | NA |
| Lead | 50 D | 500 D | -- | -- | -- | 23 | NA | 11.4 | 34.2 | 21.1 | 13.4 | NA | NA | NA | 13.7 | 1.8 | 2.9 | NA | 3.3 | NA | NA |
| Selenium | 78.2 | 6,110 | -- | -- | 1 | <0.60 | NA | 1.1 J | <0.54 | <0.55 | <0.60 | NA | NA | NA | <0.46 | <0.50 | <0.49 | NA | <0.48 | NA | NA |
| Silver | 78.2 | 6,110 | -- | -- | 1.7 | 0.39 J | NA | 0.24 J | 0.28 J | 0.46 J | 0.36 J | NA | NA | NA | 0.41 J | 0.33 J | 0.65 J | NA | 0.74 J | NA | NA |
| Mercury | -- | -- | -- | -- | 0.42 | 0.02 | NA | 0.52 | 0.016 | 0.0055 J | 0.012 | NA | NA | NA | NA | NA | <0.0037 | NA | NA | NA | NA |
| Detected VOCs (ug/kg) | | | | | | | | | | | | | | | | | | | | | |
| Ethylbenzene | 1,560,000 | 102,000,000 | 400,000 | 400,000 | 2,900 D | <26.0 | <25.0 | <25.0 | <25.0 | <25.0 | <25.0 | <25.0 | <25.0 | <25.0 | <25.0 | <25.0 | <25.0 | <25.0 | <25.0 | 2,230 | 1,520 |
| Toluene | 1,250,000 | 61,500,000 | 670,000 | 670,000 | 1,500 D | <25.0 | <25.0 | <25.0 | <25.0 | <25.0 | 81.7 J | <25.0 | <25.0 | <25.0 | <25.0 | <25.0 | <25.0 | <25.0 | <25.0 | 23,300 | 9,960 |
| 1,2,4-Trimethylbenzene[1] | 782,000 | 51,100,000 | 47,000 | 330,000 | 7,573 | <26.0 | <25.0 | <25.0 | <25.0 | <25.0 | <25.0 | <25.0 | <25.0 | <25.0 | <25.0 | <25.0 | <25.0 | <25.0 | <25.0 | <626 | <312 |
| 1,3,5-Trimethylbenzene[1] | 782,000 | 51,100,000 | 27,000 | 190,000 | 3,520 | <25.0 | <25.0 | <25.0 | <25.0 | <25.0 | <25.0 | <25.0 | <25.0 | <25.0 | <25.0 | <25.0 | <25.0 | <25.0 | <25.0 | 7,500 | 4,280 |
| Xylenes, total | 3,130,000 | 204,000,000 | 270,000 | 1,900,000 | 4,100 D | <75.0 | <75.0 | <75.0 | <75.0 | <75.0 | <75.0 | <75.0 | <75.0 | <75.0 | <75.0 | <75.0 | <75.0 | <75.0 | <75.0 | | |
| Detected SVOCs (ug/kg) | | | | | | | | | | | | | | | | | | | | | |
| Benzo(a)anthracene | 88 E | 3,900 E | -- | -- | 17,000 E | 199 | NA | 29.7 J | 38.5 J | <23.6 | <20.0 | NA | <21.8 | NA | NA | NA | NA | NA | NA | <966 | <100 |
| Benzo(a)pyrene | 8.8 E | 390 E | -- | -- | 48,000 E | 231 | NA | 33.2 J | 46.1 J | <23.4 | <21.0 | NA | <23.6 | NA | NA | NA | NA | NA | NA | <1,030 | <114 |
| Benzo(b)fluoranthene | 88 E | 3,900 E | -- | -- | 350,000 E | 164 J | NA | 34.1 J | 35.5 J | <24.7 | <21.0 | NA | <23.0 | NA | NA | NA | NA | NA | NA | <1,030 | <114 |
| Benzo(g,h,i)perylene | 1,800 E | 39,000 E | -- | -- | 6,800,000 E | 132 J | NA | <192 | <98.5 | <105 | <88.8 | NA | <97.4 | NA | NA | NA | NA | NA | NA | <1,300 | <149 |
| Benzo(k)fluoranthene | 880 E | 39,000 E | -- | -- | 870,000 E | 292 | NA | 38.0 J | 40.8 J | <23.0 | <23.0 | NA | <20.7 | NA | NA | NA | NA | NA | NA | <964 | <97.3 |
| Carbazole | -- | -- | -- | -- | -- | 24.2 J | NA | <21.1 | <20.3 | <21.5 | <18.3 | NA | <20.1 | NA | NA | NA | NA | NA | NA | <1,170 | <127 |
| Indeno(1,2,3-cd)pyrene | 88 E | 3900 E | -- | -- | 680,000 E | 172 J | NA | 33.0 J | 31.7 J | <25.1 | <23.8 | NA | <26.1 | NA | NA | NA | NA | NA | NA | <1,200 | <136 |
| Chrysene | 8,800 E | 390,000 E | -- | -- | 37,000 E | 263 | NA | 38.2 J | 57.8 J | <30.6 | <26.9 | NA | <28.4 | NA | NA | NA | NA | NA | NA | <1,790 | <193 |
| bis(2-Ethylhexyl)phthalate | 4,580 | 204,000 | -- | -- | 180,000 | <27.2 | NA | <41.6 | 160 J | 442.9 | <30.4 | NA | <30.9 | NA | NA | NA | NA | NA | NA | <1,550 | <167 |
| Fluoranthene | 600,000 E | 40,000,000 E | -- | -- | 500,000 E | 482 | NA | 79.2 J | 129 J | <37.1 | <31.4 | NA | <34.5 | NA | NA | NA | NA | NA | NA | <441 | <47.5 |
| Fluorene | 600,000 E | 40,000,000 E | -- | -- | 100,000 E | 11.0 J | NA | <19.1 | <19.9 | 18.5 | <18.6 | NA | <19.8 | NA | NA | NA | NA | NA | NA | 5,230 J | <198 |
| 2-Methylnephthalene | 600,000 E | 40,000,000 E | -- | -- | 20,000 E | <20.0 | NA | <21.5 | <21.7 | <25.1 | <19.0 | NA | <21.5 | NA | NA | NA | NA | NA | NA | 2,510 J | <110 |
| Naphthalene | 20,000 E | 110,000 E | -- | -- | 400 E | 27.1 J | NA | <22.5 | 31.9 J | <24.5 | <20.8 | NA | <22.8 | NA | NA | NA | NA | NA | NA | <1,740 | <187 |
| Pentachlorophenol | 532 | 23,800 | -- | -- | 1.5 | <96.3 | NA | <192 | <98.5 | <105 | <88.8 | NA | <97.4 | NA | NA | NA | NA | NA | NA | <4,350 | <472 |
| Phenanthrene | 18,000 E | 390,000 E | -- | -- | 1,800 E | 263 | NA | <192 | 103 J | <105 | <88.8 | NA | <97.4 | NA | NA | NA | NA | NA | NA | <2,130 | <230 |
| Pyrene | 500,000 E | 30,000,000 E | -- | -- | 8,700,000 E | 473 | NA | 74.2 J | 127 J | <51.8 | <43.2 | NA | <47.8 | NA | NA | NA | NA | NA | NA | | |
| PCBs (ug/kg) | | | | | | | | | | | | | | | | | | | | | |
| Aroclor 1016 | -- | -- | -- | -- | -- | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| Aroclor 1221 | -- | -- | -- | -- | -- | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| Aroclor 1232 | -- | -- | -- | -- | -- | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| Aroclor 1242 | -- | -- | -- | -- | -- | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| Aroclor 1248 | -- | -- | -- | -- | -- | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| Aroclor 1254 | -- | -- | -- | -- | -- | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| Aroclor 1260 | -- | -- | -- | -- | -- | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |

Notes:

Concentrations in bold exceed one or more generic RCLs.
VOCs = Volatile Organic Compounds
SVOCs = Semi-Volatile Organic Compounds
PCBs = PolyChlorinated Biphenyls
1 Standards are for 1,2,4- and 1,3,5-Trimethylbenzene combined.
D Generic RCL is established under NR 720 or NR 746
E Generic RCLs provided in Soil Cleanup Levels for PAHs Interim Guidance, WDNR RR-5 1997
-- No Generic RCL established.
J Estimated concentration above the adjusted method detection limit and below the adjusted reporting limit.
Generic RCLs not included in Wisconsin Administrative Code or Guidance are calculated from the US EPA Soil Screening Level Web Page and the default values contained in Determining Residual Contaminant Levels using the EPA Soil Screening Level Web Site WDNR PUB-RR-682 in June 2011.
NA = Not analyzed
For volatile inhalation, the lowest calculated value was used. If soil saturation concentration value < calculated values, the soil saturation concentration was used.

TABLE 1

**Soil Analytical Results - Phase II Environmental Site Assessment**
**Former Hurd Millwork**
**Merrill, Wisconsin**
**Project No. 60267701**

| Parameters | Generic RCLs: Direct Contact Pathway, Non-Industrial | Generic RCLs: Direct Contact Pathway, Industrial | Generic RCLs: Volatile Inhalation, Non-Industrial | Generic RCLs: Volatile Inhalation, Industrial | Generic RCLs: Groundwater Pathway | 7/30/2012 HF-SS-GP-10 10'-12' | 7/30/2012 HF-SS-GP-11 3'-4' | 7/30/2012 HF-SS-GP-11 7'-8' | 7/30/2012 HF-SS-GP-12 7'-8' | 7/30/2012 HF-SS-GP-12 10'-12' | 7/30/2012 HF-SS-GP-13 4'-6' | 7/30/2012 HF-SS-GP-13 (Dupl.) 4'-6' | 7/30/2012 HF-SS-GP-14 3'-4' | 7/30/2012 HF-SS-GP-14 5'-6' | 7/30/2012 HF-SS-GP-15 6'-7' | 7/31/2012 HF-SS-GP-16 3'-4' | 7/31/2012 HF-SS-GP-16 10'-11' | 7/31/2012 HF-SS-GP-17 2'-4' | 7/31/2012 HF-SS-GP-18 3'-4' | 7/31/2012 HF-SS-GP-19 3'-4' | 7/31/2012 Fill Pipe NA |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| PID/FID | -- | -- | | | -- | 43.0 | 2.3 | 17.6 | 145 | 430 | 0.1 | 0.1 | 3.0 | 0.4 | 0.0 | 0.0 | 0.8 | 2.8 | 1.0 | 1.2 | NA |
| RCRA Metals (mg/kg) | | | | | | | | | | | | | | | | | | | | | |
| Arsenic | 0.039 D | 1.6 D | -- | -- | 0.58 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | **2.8** | **2.0 J** | **2.2** | NA |
| Barium | 3,130 | 240,000 | -- | -- | 330 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | **211** | **34.8** | **62.2** | NA |
| Cadmium | 8 D | 510 D | -- | -- | 1.5 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | 0.24 J | <0.0.92 | 0.098 J | NA |
| Chromium | 16,000 D | -- | -- | -- | 3.8 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | **22.5** | **30.8** | **9.8** | NA |
| Copper | -- | -- | -- | -- | 2,200 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | **52.5** | **22.1** | **11.1** | NA |
| Lead | 50 D | 500 D | -- | -- | -- | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | **110** | **3.7** | **17.7** | NA |
| Selenium | 78.2 | 5,110 | -- | -- | 1 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | <0.96 | <0.90 | <0.85 | NA |
| Silver | 78.2 | 5,110 | -- | -- | 1.7 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | **0.58 J** | **0.38 J** | **0.31 J** | NA |
| Mercury | -- | -- | -- | -- | 0.42 | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA |
| Detected VOCs (ug/kg) | | | | | | | | | | | | | | | | | | | | | |
| Ethylbenzene | 1,560,000 | 102,000,000 | 400,000 | 400,000 | 2,900 D | <25.0 | <25.0 | <25.0 | **617** | **6,450** | <25.0 | <25.0 | <25.0 | <25.0 | <25.0 | <25.0 | <25.0 | NA | NA | NA | NA |
| Toluene | 1,250,000 | 81,800,000 | 670,000 | 670,000 | 1,500 D | <25.0 | <25.0 | <25.0 | <100 | <500 | <25.0 | <25.0 | <25.0 | <25.0 | <25.0 | <25.0 | <25.0 | NA | NA | NA | NA |
| 1,2,4-Trimethylbenzene[1] | 782,000 | 51,100,000 | 47,000 | 330,000 | 7,573 | <25.0 | <25.0 | **35.9 J** | **4,000** | **46,700** | <33.0 | <25.0 | <25.0 | <25.0 | <25.0 | <25.0 | <25.0 | NA | NA | NA | NA |
| 1,3,5-Trimethylbenzene[1] | 782,000 | 51,100,000 | 27,000 | 190,000 | 3,520 | <25.0 | <25.0 | <25.0 | <100 | **33,400** | <25.0 | <25.0 | <25.0 | <25.0 | <25.0 | <25.0 | <25.0 | NA | NA | NA | NA |
| Xylenes, total | 3,130,000 | 204,000,000 | 270,000 | 1,600,000 | 4,100 D | <75.0 | <75.0 | <75.0 | **2,280** | **27,700** | <73.0 | <75.0 | <75.0 | <75.0 | <75.0 | <73.0 | <75.0 | NA | NA | NA | NA |
| Detected SVOCs (ug/kg) | | | | | | | | | | | | | | | | | | | | | |
| Benzo(a)anthracene | 88 E | 3,900 E | -- | -- | 17,000 E | <20.5 | <21.7 | <21.4 | <43.6 | <216 | <23.2 | <19.9 | <24.5 | <19.7 | <23.6 | <11.9 | <9.5 | NA | NA | NA | NA |
| Benzo(a)pyrene | 8.8 E | 390 E | -- | -- | 48,000 E | <21.8 | <23.4 | <23.1 | <46.6 | <234 | <24.0 | <21.4 | <26.1 | <21.2 | <27.4 | <11.9 | <9.5 | NA | NA | NA | NA |
| Benzo(b)fluoranthene | 88 E | 3,900 E | -- | -- | 350,000 E | <21.3 | <22.8 | <22.4 | <45.0 | <227 | <24.3 | <20.8 | <257 | <20.6 | <21.8 | 8.1 J | <9.7 | NA | NA | NA | NA |
| Benzo(g,h,i)perylene | 1,800 E | 39,000 E | -- | -- | 6,800,000 E | <60.6 | <36.4 | <36.1 | <193 | <361 | <193 | <88.4 | <1,090 | <87.4 | <92.5 | <11.9 | <9.5 | NA | NA | NA | NA |
| Benzo(k)fluoranthene | 880 E | 39,000 E | -- | -- | 870,000 E | <26.4 | <35.4 | <30.0 | <60.0 | <355 | <32.4 | <27.9 | <343 | <27.6 | <26.2 | <11.9 | <9.5 | NA | NA | NA | NA |
| Carbazole | -- | -- | -- | -- | -- | <19.6 | <19.9 | <19.8 | <35.6 | <198 | <21.2 | <19.2 | <234 | <19.0 | <19.1 | NA | NA | NA | NA | NA | NA |
| Indeno(1,2,3-cd)pyrene | 88 E | 3900 E | -- | -- | 680,000 E | <24.1 | <25.8 | <25.5 | <51.8 | <255 | <27.6 | <23.7 | <291 | <23.4 | <24.8 | <11.9 | <9.5 | NA | NA | NA | NA |
| Chrysene | 8,800 E | 390,000 E | -- | -- | 37,000 E | <25.5 | <28.1 | <27.7 | <56.3 | <281 | <30.9 | <25.9 | <317 | <25.5 | <27.0 | **7.9 J** | <2.2 | NA | NA | NA | NA |
| bis(2-Ethylhexyl)phthalate | 4,560 | 204,000 | -- | -- | 180,000 | <36.9 | <39.5 | <39.9 | **303 J** | <394 | <47.1 | <36.2 | <446 | <35.8 | <37.9 | NA | NA | NA | NA | NA | NA |
| Fluoranthene | 800,000 E | 40,000,000 E | -- | -- | 500,000 E | <31.5 | <34.1 | <34.7 | <69.3 | <340 | <36.4 | <31.0 | <565 | <30.5 | <32.7 | <11.9 | <9.5 | NA | NA | NA | NA |
| Fluorene | 800,000 E | 40,000,000 E | -- | -- | 100,000 E | <5.1 | <9.7 | <9.6 | <19.4 | <97.7 | <10.3 | <8.9 | <166 | <8.8 | <9.3 | <11.9 | <9.5 | NA | NA | NA | NA |
| 2-Methylnaphthalene | 800,000 E | 40,000,000 E | -- | -- | 20,000 E | <19.9 | <21.3 | <21.0 | <42.8 | <212 | <22.7 | <19.5 | <249 | <19.3 | <20.4 | **2.9 J** | <1.8 | NA | NA | NA | NA |
| Naphthalene | 20,000 E | 110,000 E | -- | -- | 400 E | <21.1 | <23.6 | <23.2 | <45.2 | <235 | <24.1 | <20.7 | <264 | <20.4 | <21.6 | **6.0 J** | <3.8 | NA | NA | NA | NA |
| Pentachlorophenol | 532 | 23,800 | -- | -- | 1.6 | <96.8 | **442** | <95.1 | <193 | <961 | <103 | <88.4 | <1,360 | <87.4 | <92.5 | **8.3 J** | <2.4 | NA | NA | NA | NA |
| Phenanthrene | 18,000 E | 390,000 E | -- | -- | 1,800 E | <90.0 | <96.4 | <95.1 | <193 | <961 | <103 | <88.4 | <1,090 | <87.4 | <92.5 | <11.9 | <9.5 | NA | NA | NA | NA |
| Pyrene | 500,000 E | 30,000,000 E | -- | -- | 8,700,000 E | <43.8 | <47.0 | <46.3 | <94.0 | <469 | <50.1 | <43.1 | <533 | <42.5 | <45.0 | <11.9 | <9.5 | NA | NA | NA | NA |
| PCBs (ug/kg) | | | | | | | | | | | | | | | | | | | | | |
| Aroclor 1016 | -- | -- | -- | -- | -- | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | <236 |
| Aroclor 1221 | -- | -- | -- | -- | -- | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | <236 |
| Aroclor 1232 | -- | -- | -- | -- | -- | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | <236 |
| Aroclor 1242 | -- | -- | -- | -- | -- | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | <236 |
| Aroclor 1248 | -- | -- | -- | -- | -- | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | <236 |
| Aroclor 1254 | -- | -- | -- | -- | -- | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | <236 |
| Aroclor 1260 | -- | -- | -- | -- | -- | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | NA | <236 |

Notes:

Concentrations in bold exceed one or more generic RCLs.
VOCs = Volatile Organic Compounds
SVOCs = Semi-Volatile Organic Compounds
PCBs = PolyChlorinated Biphenyls
1 Standards are for 1,2,4- and 1,3,5-Trimethylbenzene combined.
D Generic RCL is established under NR 720 or NR 746
E Generic RCLs provided in Soil Cleanup Levels for PAHs Interim Guidance, WDNR RR-5 1997
-- No Generic RCL established.
J Estimated concentration above the adjusted method detection limit and below the adjusted reporting limit.
Generic RCLs not included in Wisconsin Administrative Code or Guidance are calculated from the US EPA Soil Screening default values contained in Determining Residual Contaminant Levels using the EPA Soil Screening Level Web Site WDNI
NA = Not analyzed
For volatile inhalation, the lowest calculated value was used. If soil saturation concentration value < calculated values, the

# TABLE 2
## Groundwater Sampling Results - Phase II Environmental Site Assessment
## Former Hurd Millwork
## Merrill, Wisconsin
## Project No. 60267701

| Parameters | NR 140 Standards ES | NR 140 Standards PAL | HF-GW-GP-3 8/7/2012 | HF-GW-GP-7 8/2/2012 | HF-GW-GP-10 8/2/2012 | HF-GW-GP-14 8/2/2012 | HF-GW-GP-15 8/2/2012 | HF-GW-GP-15 (Dupl.) 8/2/2012 | HF-GW-FD (French Drain) 8/2/2012 | HF-GW-GP-SP (Storm Pipe) 8/7/2012 |
|---|---|---|---|---|---|---|---|---|---|---|
| Metals (µg/L) | | | | | | | | | | |
| Arsenic | 10 | *1* | **12.8 J** | <4.7 | NA | NA | NA | NA | NA | <4.7 |
| Barium | 2000 | *400* | 34.6 | 57.3 | NA | NA | NA | NA | NA | 40.9 |
| Cadmium | 5 | *0.5* | <0.39 | <0.39 | NA | NA | NA | NA | NA | *0.50 J* |
| Chromium | 100 | *10* | 3.1 J | <2.4 | NA | NA | NA | NA | NA | <2.4 |
| Copper | 1300 | *130* | 5.3 J | <1.3 | NA | NA | NA | NA | NA | 38.8 |
| Lead | 15 | *1.5* | <1.4 | <1.4 | NA | NA | NA | NA | NA | 1.4 J |
| Selenium | 50 | *10* | <5.8 | <5.8 | NA | NA | NA | NA | NA | <5.8 |
| Silver | 50 | *10* | <2.3 | <2.3 | NA | NA | NA | NA | NA | <2.3 |
| Mercury | 2 | *0.2* | <0.10 | <0.10 | NA | NA | NA | NA | NA | <0.10 |
| Detected VOCs (µg/L) | | | | | | | | | | |
| sec-Butylbenzene | -- | -- | <0.89 | <0.90 | 3.6 J | <0.89 | <0.89 | <0.89 | <0.89 | <0.89 |
| Chloromethane | 3 | *0.3* | 0.27 J | <0.24 | <0.24 | <0.24 | <0.24 | <0.24 | <0.24 | <0.24 |
| Dichlorodifluoromethane | 1000 | *200* | <0.99 | <0.99 | 8.0 | <0.99 | 5.3 | 8.9 | <0.99 | <0.99 |
| Isopropylbenzene | -- | -- | <0.59 | <0.59 | 1.5 | <0.59 | <0.59 | <0.59 | <0.59 | <0.59 |
| Naphthalene | 100 | *10* | <0.89 | <0.89 | 1.4 J | <0.89 | <0.89 | <0.89 | <0.89 | <0.89 |
| n-Propylbenzene | -- | -- | <0.81 | <0.81 | 2.6 | <0.81 | <0.81 | <0.81 | <0.81 | <0.81 |
| 1,2,4-Trimethylbenzene[1] | 480 | *96* | <0.97 | <0.97 | 56.8 | <0.97 | <0.97 | <0.97 | <0.97 | <0.97 |
| 1,3,5-Trimethylbenzene[1] | 480 | *96* | <0.83 | <0.83 | 23.4 | <0.83 | <0.83 | <0.83 | <0.83 | <0.83 |
| Detected SVOCs (µg/L) | | | | | | | | | | |
| Naphthalene | 100 | *10* | <0.84 | NA | 1.4 J | <0.69 | <0.66 | <0.68 | <0.70 | <0.68 |
| Pentachlorophenol | 1 | *0.1* | <1.3 | NA | **9.0 J** | <1.1 | <1.0 | <1.0 | <1.1 | <1.0 |

Notes:

VOCs = Volatile Organic Compounds

SVOCs = Semi-Volatile Organic Compounds

[1] Standards are for 1,2,4- and 1,3,5-Trimethylbenzene combined.

**Bold value** = NR 140 Enforcement Standard Exceedance

*Italic value* = NR 140 WAC Preventive Action Limit Exceedance

-- No NR 140 ES or PAL established.

NA = Not analyzed