Ripon Office
608 North Stanton Street
Ripon, Wisconsin 54971
P. 920.745.2200

May 29, 2024

State of Wisconsin
Department of Natural Resources
890 Spruce Street
Baldwin, WI 54002

Attn: Mr. Jayson Schrank
Project Manager

Re: **DOLLAR GENERAL ETTRICK SITE INVESTIGATION WORK PLAN** (NR 716.09) (2) (a)
Dollar General Ettrick
1/2 mile SW of HWY 53 & CTH D
Ettrick, Wisconsin 54627
WDNR BRRTS Activity No. 02-62-594000
PSI Project No. 00922567

Dear Mr. Schrank:

Professional Service Industries, Inc. (PSI) is pleased to submit this work plan for the performance of the site investigation of the arsenic soil contamination at the above-referenced location. This Work Plan has been prepared in general accordance with Wisconsin Administrative Code (WAC) NR 716.

RESPONSIBLE PARTY AND CONSULTANT

Site Name:	Dollar General Ettrick
Site Address:	1/2 mile SW of HWY 53 & CTH D Ettrick, Wisconsin 54627
Site Location:	Southwest ¼ of the Northeast ¼, Section 36, Township 20 North, Range 8 West, in Trempeleau County, State of Wisconsin (Lat: 44.1669228°, Long: -91.2806142°)
Site Operations:	A dollar General is proposed to be constructed on the Subject Property including a septic and leach field.
Responsible Party:	Mr. Mark Bush Capital Growth Buchalter, Inc. 361 Summit Blvd, Suite 110 Birmingham, Alabama 35243 Phone: 205-263-4589
Consulting Firm:	Professional Service Industries, Inc. 608 North Stanton Street Ripon, Wisconsin 54971 Phone: (920) 745-2200

PSI Branch Manager: Jeffrey Fischer (email: jeffrey.fischer@intertek.com)
PSI Project Specialist: Rebecca Zahn (email: Rebecca.zahn@intertek.com)
PSI Geologist/
Environmental Scientist: David Egerton (email: David.egerton@intertek.com)

SITE INFORMATION AND BACKGROUND

The Subject Property consists of an approximately 2.06-acre parcel that is undeveloped. The property is currently occupied by agricultural land and a small vacant lot with a gravel driveway in the southeastern portion of the property. The Subject Property is located a half mile southwest of the intersection of Highway 53 and County Highway D. The Subject Property is within the Southwest ¼ of the Northeast ¼, Section 36, Township 20 North, Range 8 West, in Trempeleau County. The Subject Property is Lot 1 of tax key number 014017540000, and the current property owner is John W. Vehrenkamp, Jr. Capital Growth Buchalter, Inc. is under contract to purchase the property.

According to the Phase I Environmental Site Assessment (ESA), the subject property appeared to consist of agricultural land from at least 1938 to 1965. From approximately 1973 to present the west section of the subject property appears to consist of agricultural land, the east section appears to consist of grassland. The north adjoining property appeared to consist of agricultural land from at least 1938 to 1965. From approximately 1973 to 2006 the north adjoining property appeared to consist of a gravel driveway followed north by grassland, followed further north by a commercial property in the east, and agricultural land in the west. Based upon review of photos of various years on Google Earth, the north/northeast adjoining property appears to consist of a commercial property from between 2008 and 2010 to present, which has been used for vehicle parking/salvage yard, followed north by a commercial property. The adjacent property to the north/northeast of the subject property is also occupied by an auto repair shop.

The east adjoining property appears to consist of agricultural land in 1938. From approximately 1951 to 1973 the east adjoining property appears to consist of a highway (Highway 53) followed east by agricultural land in the north section, and residential properties in the south section. From approximately 1981 to 2021 the east adjoining property appears to consist of a highway (Highway 53) followed east by a commercial property in the north section, and residential properties in the south section. The south adjoining property appeared to consist of agricultural land since at least 1938. From approximately 1951 to present the south adjoining property appears to consist of a road (Highway 53) going from the northeast to the southwest, followed south by residential properties. The west adjoining property appears to consist of agricultural land from at least 1938 to present.

As part of the Phase II ESA, four (4) geoprobes were performed on November 15, 2023. Temporary groundwater sampling points were proposed, but due to caving and no groundwater encountered in the upper 18 feet of the geoprobes, PSI was unable to install any wells. Upon discovering exceedances for arsenic in the samples in GP-1, GP-2, and GP-4 at a depth of 2 to 4 feet (with concentrations of 11.0, 13.7, and 10.8 mg/kg, respectively, above the Background Threshold Value (BTV) of 8 mg/kg), three (3) additional geoprobes were performed on April 1, 2024. Exceedances for arsenic were encountered at GP-6 and GP-7 at concentrations of 8.9 and 9.3 mg/kg, respectively, above the BTV of 8 mg/kg. Considering the concentrations of arsenic decrease to the south direction away for the adjacent property, it is of the opinion of PSI that the source of the contamination exists within the salvage yard within the adjacent property to the north.

REGIONAL GEOLOGY

The area of the Subject Property is located within the Driftless Area of southwestern Wisconsin (Preliminary Bedrock Geology of Southern Trempealeau County, Wisconsin, Wisconsin Geological and Natural History Survey). It consists of fluvial alluvium, eroded hillside colluvium, and windblown loess. Depth to bedrock varies and is up to a depth of 225 feet. Bedrock in this area includes Cambrian siliciclastics or Ordovician carbonates (dolomite and sandstone). Based on Geoprobe exploration performed by PSI, the surface materials at the subject site consist of 10 to 36 inches of brown sand classified as topsoil. The underlying soils consist of

sand.

REGIONAL HYDROGEOLGY

A review of the United States Geological Survey (USGS) Ettrick Quadrangle Map indicated that the Subject Property is relatively level, with a slight slope down towards the southeast. A surface elevation of approximately 774 feet above mean sea level (MSL) was indicated on the Subject Property based on the Alta/NSPS Land Title Survey map. Generally, the topography in the surrounding vicinity is also relatively level and slopes gradually towards the southeast. The North Fork River is approximately 900 feet southeast of the Subject Property. Regional groundwater flow in the area of the Subject Property appears to be to the southeast toward the North Fork River. Based on observations from the geoprobe exploration, groundwater levels were between 18 and 19 feet below the existing ground surface.

WORK PLAN

The purpose of the proposed site investigation will be to evaluate the vertical and horizontal extent of the arsenic impacted soil and determine if the source is from the subject property or the adjacent property to the north. Dependent upon the findings of the investigative activities, it may be possible to develop a remedial action plan or request case closure. However, if this phase is not sufficient in determining the extent of the affected zones, it may be necessary to perform additional exploratory work in order to fully evaluate the site conditions.

The next phase of this ESA will include additional geoprobes to the west and north of the adjacent property, as well as to the south of the previous geoprobe locations. Permission was not granted to perform geoprobes on the adjacent property to the north. If contaminated soils are documented above WDNR standards within the samples collected, an additional phase of geoprobes will be installed to define the extents of the arsenic contamination. If samples along the west/northwest side of the fence along the adjacent property are below WDNR standards, this would be a good indication that the source of the arsenic is from the adjacent property.

The performance of the geoprobes and the sample collection and analysis will be performed in general accordance with the guidelines and codes utilized by the WDNR for such site investigations. The samples for chemical analysis will be properly collected and preserved in containers provided by the laboratory. The samples will be placed on ice and standard chain-of-custody procedures will be utilized. An environmental project engineer or geologist (environmental professional) will be on the Subject Property during the performance of the fieldwork. Following the completion of the field activities and receipt of the analytical results, an NR716 Site Investigation Report (SIR) will be prepared and submitted to the WDNR.

Soil cuttings generated from the work will be placed into 55-gallon drums for future disposal. These drums will remain on the Subject Property, pending the receipt of the laboratory analysis results and landfill acceptance. Pending the laboratory analysis results, it will be assumed that the drum contents will be manifested and disposed at a landfill facility as a special waste. The purpose of the site investigation activities is not intended to serve as an “all-inclusive” evaluation of the potential presence of all potential chemical constituents, compounds or hazardous materials to be present within the subsurface across the Subject Property.

The proposed soil sampling work described herein will be conducted in general accordance with ASTM Standard E 1903-97. Drilling and sampling operations will be directed by a PSI field supervisor. All field personnel will be OSHA trained in accordance with 29 CFR 1910.120. Equipment decontamination, sample collection, field documentation, sample custody and laboratory analyses will be in accordance with methods prescribed by the United States Environmental Protection Agency (USEPA).

If you have any questions, please contact PSI at (920) 745-2200.

Respectfully Submitted,

PROFESSIONAL SERVICE INDUSTRIES, INC.

David Egerton Geologist/Environmental Scientist	Rebecca Zahn Project Specialist	Jeffrey Fischer Branch Manager

Appendix A: Figure 1: Subject Property Location
Figure 2: Proposed Geoprobe/Monitoring Well Locations

Appendix B: Analytical Results Tables
Table 1: Soil Analytical Results Table

Site Location

Dollar General - Ettrick, WI

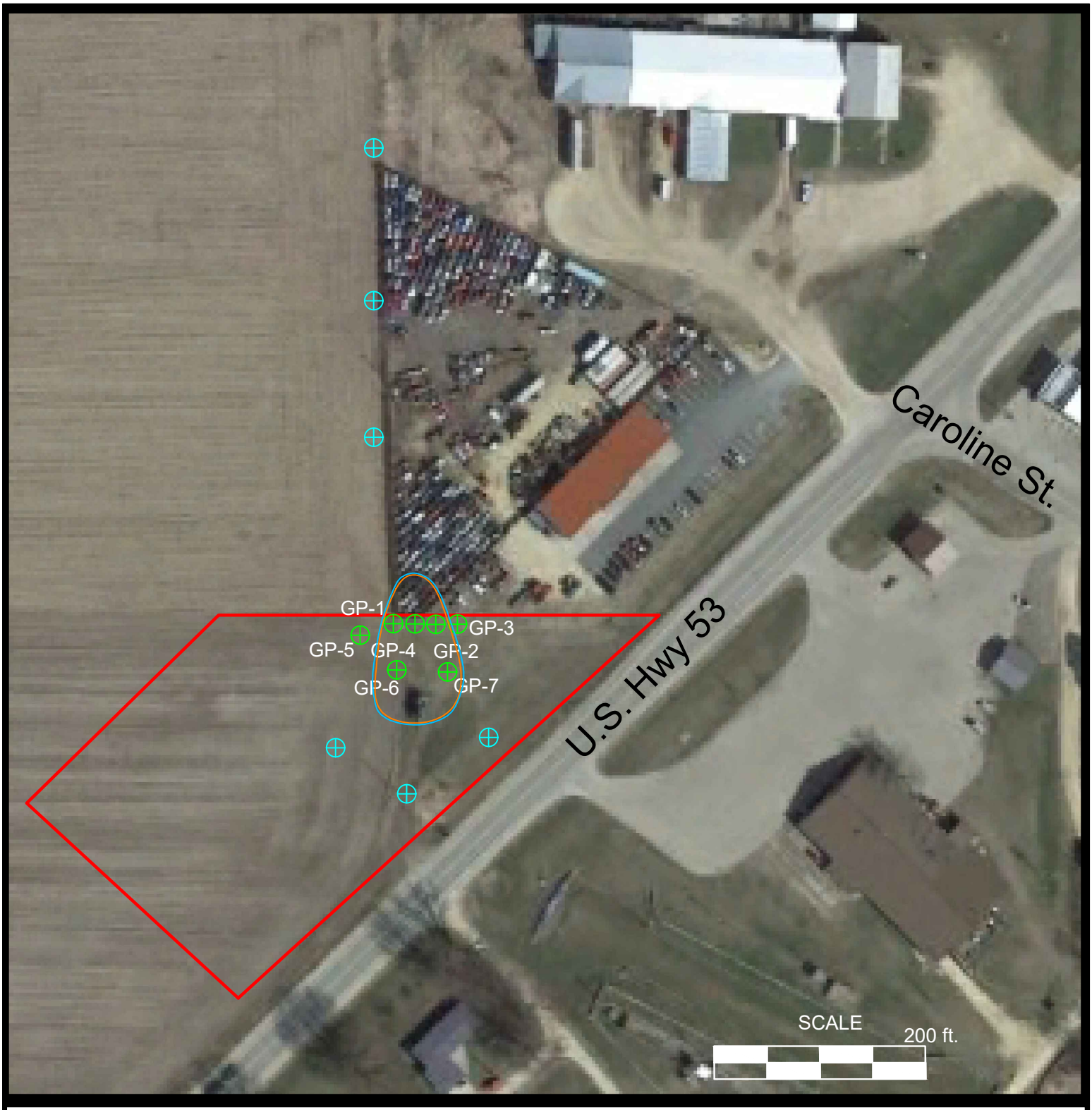
intertek psi

Date: 11/29/23 Drawn by: de

Environmental Services
608 N. Stanton St.
Ripon, WI 54971
Phone (920) 745-2200
Fax (920) 745-2222

N

Project No. 00922567



Proposed Geoprobe Locations

Phase II ESA Hwy 53
Ettrick, WI

intertek psi

Environmental Services
608 N. Stanton St.
Ripon, WI 54971
Phone (920) 745-2200

Date: 05/08/24 Drawn by: de

N

LEGEND

- Proposed Geoprobe Location
- Previously drilled Geoprobe Location
- Inferred extent of RCL exceedance of RCRA Metals (Arsenic only) for Direct Contact Non-Industrial in Soils
- Inferred extent of RCL exceedance of RCRA Metals (Arsenic only) for Groundwater Pathway in Soils

Project No. 00922567

TABLE 1 (page 1 of 2)
GP-1 to GP-4
Summary of Soil Analytical Results
DG Ettrick
U.S. Highway 53 (Corn Field)
Ettrick, Wisconsin
PSI Project No. 00922567

Location	GP-1	GP-1	GP-2	GP-2	GP-3	GP-3	GP-4	GP-4	NR 720 RCL			NR720 BTV
Depth	2-4 ft	18-20 ft	2-4 ft	18-20 ft	4-6 ft*	18-20 ft	2-4 ft	18-20 ft				
saturated/unsaturated (S/U)	U	S	U	S	U	S	U	S	Direct Contact/ Non-Industrial	Direct Contact/ Industrial	Groundwater Pathway	
PID (ppm)	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0				
Analytical Parameter												
VOCs (µg/kg)												
Ethylbenzene	17.1	<16.0	<14.1	<15.6	<13.3	<15.2	<14.0	<15.3	**8,020**	35,400	*1570*	---
1,2,4-Trimethylbenzene (TMB)	33.3	<20.0	<17.7	<19.5	<16.0	<19.0	<17.6	,19.1	**219,000**	219,000	*1378.7*	---
Xylenes	65.6	<48.4	<42.8	<47.3	<33.5	<46.2	<42.6	<46.4	**260,000**	260,000	*3960*	---
PAHs (µg/kg)												
Benzo(a)anthracene	2.5	<2.5	<2.4	<2.5	<2.2	<2.5	3.8	3.9	**11,140**	20,800	---	---
Benzo(a)pyrene	<2.0	<2.2	<2.1	<2.2	<2.0	<2.2	2.3	<2.2	**115**	2,110	*470*	---
Benzo(b)fluoranthene	2.9	<2.5	<2.5	<2.7	<2.4	<2.6	<2.5	<2.7	**1,150**	21,100	*478.1*	---
Fluoranthene	3.1	<2.3	<2.2	<2.3	<2.0	<2.3	<2.2	3.7	**2,390,000**	30,100,000	*888,777.8*	---
Phenanthrene	2.4	<2.2	<2.1	<2.2	<2.0	<2.2	<2.1	2.4	---	---	---	---
Pyrene	<2.6	<2.9	<2.7	<2.8	<2.5	<2.8	<2.7	3.0	**1,790,000**	22,600,000	*54,545.5*	---
RCRA Metals (mg/kg)												
Arsenic	***11.0***	6.8	***13.7***	<1.6	3.7	<1.6	***10.8***	<1.6	**0.613**	3	*0.584*	8
Barium	35.3	6.0	39.2	6.5	10.3	2.5	73	10	**15,300**	100,000	*164.8*	364
Chromium	6.2	4.8	4.6	2.8	2.3	1.7	6.0	3.4	--	--	*360,000*	43.5
Lead	3.1	1.6	2.1	1.3	1.8	0.9	2.4	1.0	**400**	800	*27*	52

* Gravel upper 4'

Notes:

Bold concentrations exceed NR 720 non-industrial direct contact RCLs

Boxed concentrations exceed NR 720 industrial direct contact RCLs

Italicized concentrations exceed NR 720 groundwater pathway RCLs

--- Standard Not Established

RCL - residual contaminant level

PID = Photoionization Detector

S/U = Sample Saturated/Unsaturated

PAH - polynuclear aromatic hydrocarbons

VOC - volatile organic compounds

ppm = parts per million

µg/kg -micrograms per kilogram, parts per billion

TABLE 1 (page 2 of 2)
GP-5 to GP-7
Summary of Soil Analytical Results
DG Ettrick
U.S. Highway 53 (Corn Field)
Ettrick, Wisconsin
PSI Project No. 00922567

Location	GP-5	GP-5	GP-6	GP-6	GP-7	GP-7	NR 720 RCL			NR720 BTV
Depth	2-4 ft	18-20 ft	2-4 ft	18-20 ft	2-4 ft	18-20 ft				
saturated/unsaturated (S/U)	U	S	U	S	U	S	Direct Contact/ Non-Industrial	Direct Contact/ Industrial	Groundwater Pathway	
PID (ppm)	0.0	0.0	0.0	0.0	0.0	0.0				
Analytical Parameter										
VOCs (µg/kg)										
Ethylbenzene	17.1	<16.0	<14.1	<15.6	<13.3	<15.2	**8,020**	35,400	*1570*	---
1,2,4-Trimethylbenzene (TMB)	33.3	<20.0	<17.7	<19.5	<16.0	<19.0	**219,000**	219,000	*1378.7*	---
Xylenes	65.6	<48.4	<42.8	<47.3	<33.5	<46.2	**260,000**	260,000	*3960*	---
PAHs (µg/kg)										
Benzo(a)anthracene	NA	NA	NA	NA	NA	NA	**11,140**	20,800	---	---
Benzo(a)pyrene	NA	NA	NA	NA	NA	NA	**115**	2,110	*470*	---
Benzo(b)fluoranthene	NA	NA	NA	NA	NA	NA	**1,150**	21,100	*478.1*	---
Fluoranthene	NA	NA	NA	NA	NA	NA	**2,390,000**	30,100,000	*888,777.8*	---
Phenanthrene	NA	NA	NA	NA	NA	NA	---	---	---	---
Pyrene	NA	NA	NA	NA	NA	NA	**1,790,000**	22,600,000	*54,545.5*	---
RCRA Metals (mg/kg)										
Arsenic	3.3	<1.6	***8.9***	<1.6	***9.3***	<1.6	**0.613**	3	*0.584*	8
Barium	NA	NA	NA	NA	NA	NA	**15,300**	100,000	*164.8*	364
Chromium	NA	NA	NA	NA	NA	NA	--	--	*360,000*	43.5
Lead	NA	NA	NA	NA	NA	NA	**400**	800	*27*	52

Notes:

Bold concentrations exceed NR 720 non-industrial direct contact RCLs

Boxed concentrations exceed NR 720 industrial direct contact RCLs

Italicized concentrations exceed NR 720 groundwater pathway RCLs

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µg/kg -micrograms per kilogram, parts per billion