State of Wisconsin
Department of Natural Resources
P.O. Box 7921, Madison, WI 53707-7921

GIS REGISTRY (Cover Sheet)

Form 4400-280 (R 6/13)

Source Property Information

CLOSURE DATE: 06/30/2014

BRRTS #: **02-08-561659**

FID #: 408005730

ACTIVITY NAME: American Finishing Resources

DATCP #:

PROPERTY ADDRESS: 476 Clay St

PECFA#:

MUNICIPALITY: Chilton

PARCEL ID #: 211-0000-0000000-000-0-182018-05-020C

***WTM COORDINATES:**

X: **668204** Y: **397052**

** Coordinates are in WTM83, NAD83 (1991)*

WTM COORDINATES REPRESENT:

- (●) Approximate Center Of Contaminant Source
- ( ) Approximate Source Parcel Center

Please check as appropriate: (BRRTS Action Code)

CONTINUING OBLIGATIONS

Contaminated Media for Residual Contamination:

- [x] Groundwater Contamination > ES *(236)*
  - [ ] Contamination in ROW
  - [ ] Off-Source Contamination

  *(**note:** for list of off-source properties see "Impacted Off-Source Property Information, Form 4400-246")*

- [x] Soil Contamination > *RCL or **SSRCL *(232)*
  - [ ] Contamination in ROW
  - [ ] Off-Source Contamination

  *(**note:** for list of off-source properties see "Impacted Off-Source Property Information, Form 4400-246")*

Site Specific Obligations:

- [ ] Soil: maintain industrial zoning *(220)*

  *(**note:** soil contamination concentrations between non-industrial and industrial levels)*

- [ ] Structural Impediment *(224)*
- [ ] Site Specific Condition *(228)*
- [ ] Cover or Barrier *(222)*
  - [ ] Direct Contact
  - [ ] Soil to GW Pathway
- [ ] Vapor Mitigation *(226)*
- [ ] Maintain Liability Exemption *(230)*

  *(**note:** local government unit or economic development corporation was directed to take a response action)*

Monitoring Wells:

Are all monitoring wells properly abandoned per NR 141? *(234)*

(●) Yes ( ) No ( ) N/A

** Residual Contaminant Level*
***Site Specific Residual Contaminant Level*

State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
2984 Shawano Avenue
Green Bay WI 54313-6727

Scott Walker, Governor
Cathy Stepp, Secretary
Telephone 608-266-2621
Toll Free 1-888-936-7463
TTY Access via relay - 711

June 30, 2014

American Finishing Resources, LLC
Attn: Mr. Matt Kirchner
476 Clay Street
Chilton, WI 53014

KEEP THIS DOCUMENT WITH YOUR PROPERTY RECORDS

SUBJECT: Final Case Closure with Continuing Obligations
American Finishing Resources, 476 Clay Street, Chilton, Wisconsin
DNR BRRTS Activity # 02-08-561659

Dear Mr. Kirchner:

The Department of Natural Resources (DNR) considers the American Finishing Resources site closed with continuing obligations. No further investigation or remediation is required at this time. However, you, future property owners, and occupants of the property must comply with the continuing obligations as explained in the conditions of closure in this letter. Please read over this letter closely to ensure that you comply with all conditions and other on-going requirements. Provide this letter and any attachments listed at the end of this letter to anyone who purchases, rents or leases this property from you.

This final closure decision is based on the correspondence and data provided, and is issued under chs. NR 726 and 727, Wis. Adm. Code. The Northeast Region (NER) Closure Committee reviewed the request for closure on June 16, 2014. The Closure Committee reviews environmental remediation cases for compliance with state laws and standards to maintain consistency in the closure of these cases. A conditional closure letter was issued by the DNR on June 18, 2014, and documentation that the conditions in that letter were met was received on June 30, 2014.

The property is being utilized for manufacturing purposes. Soil and groundwater contaminated with polycyclic aromatic hydrocarbons and heavy metals remain underneath a portion of the existing building structure. Soil and groundwater sampling over time confirmed a limited soil source and stable or receding groundwater contaminant concentrations. A limited amount of wood and metal debris was identified in the source area. This should be taken into consideration during any future redevelopment activities. The conditions of closure and continuing obligations required were based on the property being used for commercial/industrial purposes.

Continuing Obligations

The continuing obligations for this site are summarized below. Further details on actions required are found in the section Closure Conditions.

- Groundwater contamination is present above ch. NR 140, Wis. Adm. Code enforcement standards.

- Residual soil contamination exists that must be properly managed should it be excavated or removed.

The DNR fact sheet, "Continuing Obligations for Environmental Protection", RR-819, helps to explain a property owner's responsibility for continuing obligations on their property. The fact sheet may be obtained at http://dnr.wi.gov/files/PDF/pubs/rr/RR819.pdf.

GIS Registry

This site will be included on the Bureau for Remediation and Redevelopment Tracking System (BRRTS on the Web) at http://dnr.wi.gov/topic/Brownfields/clean.html, to provide public notice of residual contamination and of any continuing obligations. The site can also be viewed on the Remediation and Redevelopment Sites Map (RRSM), a map view, under the Geographic Information System (GIS) Registry layer, at the same web address.

DNR approval prior to well construction or reconstruction is required for all sites shown on the GIS Registry, in accordance with s. NR 812.09 (4) (w), Wis. Adm. Code. This requirement applies to private drinking water wells and high capacity wells. To obtain approval, complete and submit Form 3300-254 to the DNR Drinking and Groundwater program's regional water supply specialist. This form can be obtained on-line at http://dnr.wi.gov/topic/wells/documents/3300254.pdf.

All site information is also on file at the Northeast Regional DNR office at the following address:

Wisconsin Department of Natural Resources
2984 Shawano Avenue
Green Bay, WI 54313

This letter and information that was submitted with your closure request application, including any maps, can be found as a Portable Document Format (PDF) in BRRTS on the Web.

Closure Conditions

Compliance with the requirements of this letter is a responsibility to which you and any subsequent property owners must adhere. DNR staff will conduct periodic prearranged inspections to ensure that the conditions included in this letter are met. If these requirements are not followed, the DNR may take enforcement action under s. 292.11, Wis. Stats. to ensure compliance with the specified requirements, limitations or other conditions related to the property.

Please send written notifications in accordance with the following requirements to:

Department of Natural Resources
Attn: Remediation and Redevelopment Program Environmental Program Associate
2984 Shawano Avenue
Green Bay, WI 54313

Residual Groundwater Contamination (ch. NR 140, 812, Wis. Adm. Code)
Groundwater contamination greater than enforcement standards is present on this contaminated property, as shown on the attached map (Figure B.3.b, Groundwater Isoconcentration, 4/23/14). If you intend to construct a new well, or reconstruct an existing well, you'll need prior DNR approval.

Residual Soil Contamination (ch. NR 718, chs. 500 to 536, Wis. Adm. Code or ch. 289, Wis. Stats.)
Soil contamination remains as indicated on the attached map (Figure B.2.c, Pre/Post Remaining Soil Contamination, 4/23/14). If any contaminated soil is excavated in the future, the property owner or

right-of-way holder at the time of excavation must sample and analyze the excavated soil to determine if contamination remains. If sampling confirms that contamination is present, the property owner or right-of-way holder at the time of excavation will need to determine whether the material is considered solid or hazardous waste and ensure that any storage, treatment or disposal is in compliance with applicable standards and rules. Contaminated soil may be managed in accordance with ch. NR 718, Wis. Adm. Code, with prior DNR approval.

In addition, all current and future owners and occupants of the property and right-of-way holders need to be aware that excavation of the contaminated soil may pose an inhalation or other direct contact hazard and as a result special precautions may need to be taken to prevent a direct contact health threat to humans.

Depending on site-specific conditions, construction over contaminated soils or groundwater may result in vapor migration of contaminants into enclosed structures or migration along newly placed underground utility lines. The potential for vapor inhalation and means of mitigation should be evaluated when planning any future redevelopment, and measures should be taken to ensure the continued protection of public health, safety, welfare and the environment at the site.

General Wastewater Permits for Construction Related Dewatering Activities

The DNR's Water Quality Program regulates point source discharges of contaminated water, including discharges to surface waters, storm sewers, pits, or to the ground surface. This includes discharges from construction related dewatering activities, including utility and building construction.

If you or any other person plan to conduct such activities, you or that person must contact that program, and if necessary, apply for the necessary discharge permit. Additional information regarding discharge permits is available at http://dnr.wi.gov/topic/wastewater/GeneralPermits.html. If residual soil or groundwater contamination is likely to affect water collected in a pit/trench that requires dewatering, a general permit for Discharge of Contaminated Groundwater from Remedial Action Operations may be needed. If water collecting in a pit/trench that requires dewatering is expected to be free of pollutants other than suspended solids and oil and grease, a general permit for Pit/Trench Dewatering may be needed.

Chapter NR 140, Wis. Adm. Code Exemption

Recent groundwater monitoring data at this site indicates that for cadmium and lead at monitoring point GP11A contaminant levels exceed the NR 140 preventive action limit (PAL) but are below the enforcement standard (ES). The DNR may grant an exemption to a PAL for a substance of public health concern, other than nitrate, pursuant to s. NR 140.28 (2) (b), Wis. Adm. Code, if all of the following criteria are met:

1. The measured or anticipated increase in the concentration of the substance will be minimized to the extent technically and economically feasible.
2. Compliance with the PAL is either not technically or economically feasible.
3. The enforcement standard for the substance will not be attained or exceeded at the point of standards application. [Note: at this site the point of standards application is all points where groundwater is monitored.]
4. Any existing or projected increase in the concentration of the substance above the background concentration does not present a threat to public health or welfare.

Based on the information you provided, the DNR believes that these criteria have been or will be met due to the fact that only a limited soil contaminant source was identified and groundwater impacts were only slightly above the PAL. Therefore, pursuant to s. NR 140.28, Wis. Adm. Code, an exemption to the PAL is granted for cadmium and lead at monitoring point GP11A. Please keep this letter, because it serves as your exemption.

In Closing

Please be aware that the case may be reopened pursuant to s. NR 727.13, Wis. Adm. Code, for any of the following situations:

- if additional information regarding site conditions indicates that contamination on or from the site poses a threat to public health, safety, or welfare or to the environment,
- if the property owner does not comply with the conditions of closure, with any deed restrictions applied to the property, or with a certificate of completion issued under s. 292.15, Wis. Stats, or
- a property owner fails to maintain or comply with a continuing obligation (imposed under this closure approval letter).

The DNR appreciates your efforts to restore the environment at this site. If you have any questions regarding this closure decision or anything outlined in this letter, please contact Keld Lauridsen at (920) 662-5420, or at Keld.Lauridsen@wisconsin.gov.

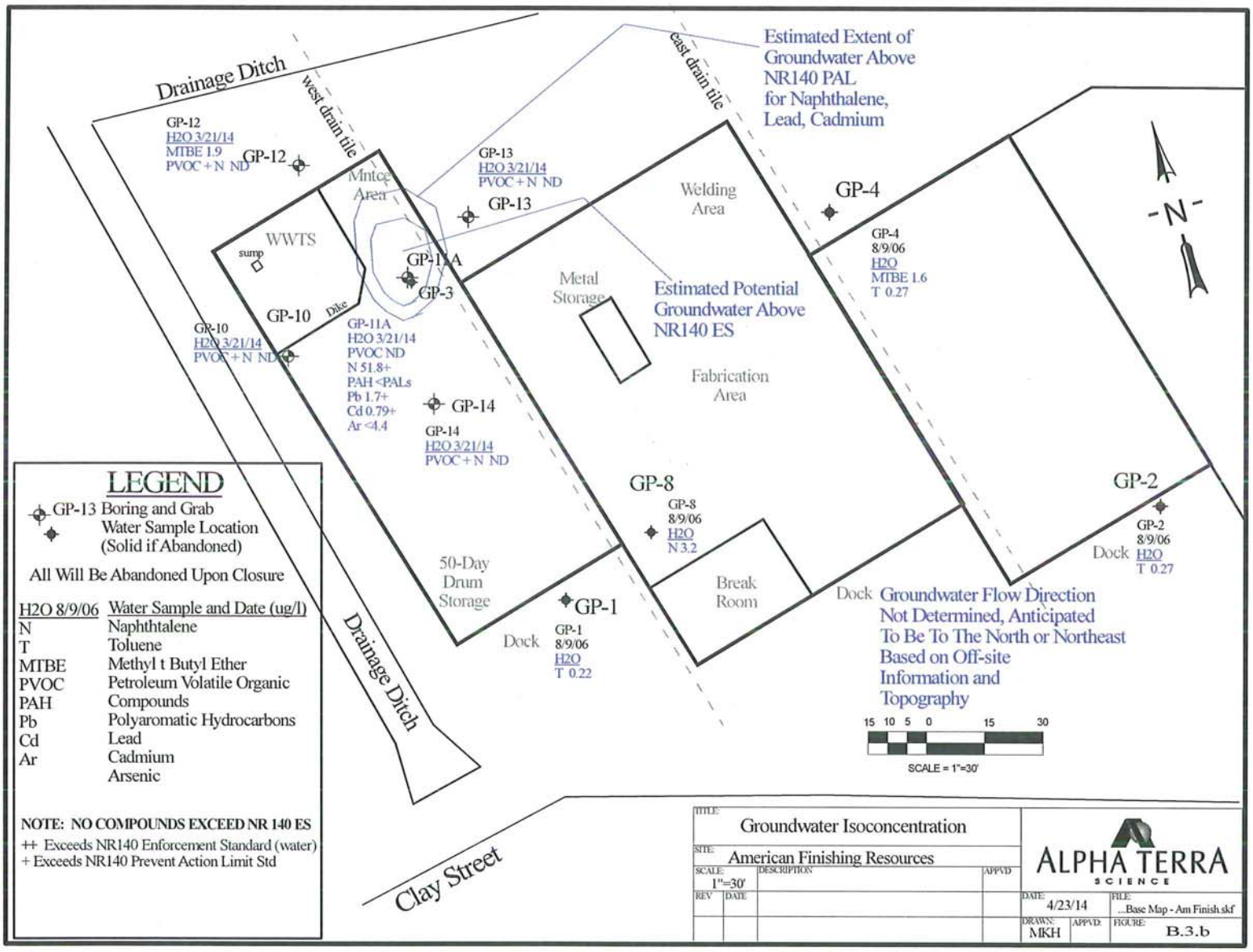
Sincerely,

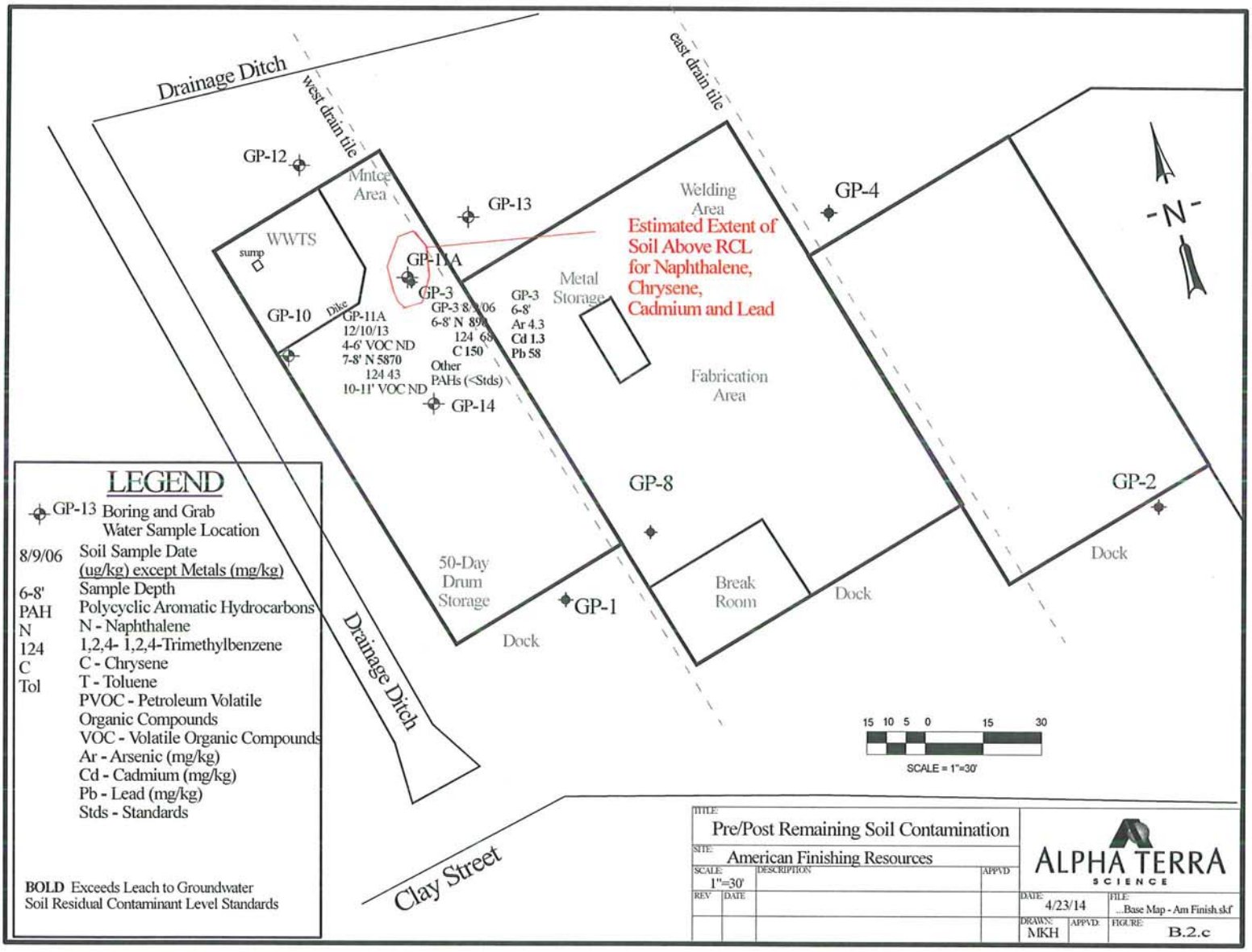
Roxanne N. Chronert, Team Supervisor
Northeast Region Remediation & Redevelopment Program

Attachments:

- Groundwater Isoconcentration, Figure B.3.b , 4/23/14
- Pre/Post Remaining Soil Contamination, Figure B.2.c, 4/23/14

cc: Kendrick Ebbott, Fehr Graham (e-copy - kebbott@fehr-graham.com)
Bill Phelps, DG/5


Drainage Ditch
west drain tile
east drain tile
Estimated Extent of Groundwater Above NR140 PAL for Naphthalene, Lead, Cadmium
GP-12
H2O 3/21/14
MTBE 1.9
PVOC + N ND
GP-12
Mntce Area
GP-13
H2O 3/21/14
PVOC + N ND
GP-13
Welding Area
GP-4
GP-4
8/9/06
H2O
MTBE 1.6
T 0.27
WWTS
sump
GP-11A
GP-3
Metal Storage
Estimated Potential Groundwater Above NR140 ES
GP-10
Dike
GP-10
H2O 3/21/14
PVOC + N ND
GP-11A
H2O 3/21/14
PVOC ND
N 51.8+
PAH <PALs
Pb 1.7+
Cd 0.79+
Ar <4.4
GP-14
GP-14
H2O 3/21/14
PVOC + N ND
Fabrication Area
GP-8
GP-8
8/9/06
H2O
N 3.2
GP-2
GP-2
8/9/06
H2O
T 0.27
Dock
50-Day Drum Storage
GP-1
GP-1
8/9/06
H2O
T 0.22
Dock
Break Room
Dock
Groundwater Flow Direction Not Determined, Anticipated To Be To The North or Northeast Based on Off-site Information and Topography
15 10 5 0 15 30
SCALE = 1"=30'
-N-
Drainage Ditch
Clay Street
LEGEND
GP-13 Boring and Grab
Water Sample Location (Solid if Abandoned)
All Will Be Abandoned Upon Closure
H2O 8/9/06 Water Sample and Date (ug/l)
N Naphthtalene
T Toluene
MTBE Methyl t Butyl Ether
PVOC Petroleum Volatile Organic
PAH Compounds
Pb Polyaromatic Hydrocarbons
Cd Lead
Ar Cadmium
Arsenic
NOTE: NO COMPOUNDS EXCEED NR 140 ES
++ Exceeds NR140 Enforcement Standard (water)
+ Exceeds NR140 Prevent Action Limit Std
TITLE: Groundwater Isoconcentration
SITE: American Finishing Resources
SCALE: 1"=30'
DESCRIPTION
APPVD
REV
DATE
ALPHA TERRA SCIENCE
DATE: 4/23/14
FILE: ...Base Map - Am Finish.skf
DRAWN: MKH
APPVD:
FIGURE: B.3.b


Drainage Ditch
west drain tile
east drain tile
GP-12
Mntce Area
GP-13
Welding Area
GP-4
WWTS
sump
GP-11A
GP-3
Estimated Extent of Soil Above RCL for Naphthalene, Chrysene, Cadmium and Lead
Metal Storage
GP-10
Dike
GP-11A 12/10/13 4-6' VOC ND 7-8' N 5870 124 43 10-11' VOC ND
GP-3 8/9/06 6-8' N 89 124 68 C 150 Other PAHs (<Stds)
GP-3 6-8' Ar 4.3 Cd 1.3 Pb 58
Fabrication Area
GP-14
GP-8
GP-2
50-Day Drum Storage
GP-1
Dock
Break Room
Dock
Dock
Drainage Ditch
Clay Street
-N-
15 10 5 0 15 30
SCALE = 1"=30'
LEGEND
GP-13 Boring and Grab Water Sample Location
8/9/06 Soil Sample Date
(ug/kg) except Metals (mg/kg)
6-8' Sample Depth
PAH Polycyclic Aromatic Hydrocarbons
N N - Naphthalene
124 1,2,4- 1,2,4-Trimethylbenzene
C C - Chrysene
Tol T - Toluene
PVOC - Petroleum Volatile Organic Compounds
VOC - Volatile Organic Compounds
Ar - Arsenic (mg/kg)
Cd - Cadmium (mg/kg)
Pb - Lead (mg/kg)
Stds - Standards
BOLD Exceeds Leach to Groundwater Soil Residual Contaminant Level Standards
TITLE: Pre/Post Remaining Soil Contamination
SITE: American Finishing Resources
SCALE: 1"=30'
DESCRIPTION
APP'VD
REV DATE
ALPHA TERRA SCIENCE
DATE: 4/23/14
FILE: ...Base Map - Am Finish.skf
DRAWN: MKH
APP'VD:
FIGURE: B.2.c

State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
2984 Shawano Avenue
Green Bay WI 54313-6727

Scott Walker, Governor
Cathy Stepp, Secretary
Telephone 608-266-2621
Toll Free 1-888-936-7463
TTY Access via relay - 711

June 18, 2014

American Finishing Resources, LLC
Attn: Mr. Matt Kirchner
476 Clay Street
Chilton, WI 53014

Subject: Conditional Closure Decision with Requirements to Achieve Final Closure
American Finishing Resources, 476 Clay Street, Chilton, Wisconsin
DNR BRRTS Activity # 02-08-561659

Dear Mr. Kirchner:

On June 16, 2014, the Northeast Region Closure Committee reviewed your request for closure of the case described above. The Closure Committee reviews environmental remediation cases for compliance with state rules and statutes to maintain consistency in the closure of these cases. After careful review of the closure request, the Closure Committee has determined that the polycyclic aromatic hydrocarbon and metal contamination identified at the site underneath an existing building structure along the western edge of the property and likely related to a small release or a small quantity of waste material historically disposed in this area appears to have been investigated and remediated to the extent practicable under site conditions. Your case has been remediated to Department standards in accordance with ch. NR 726, Wis. Adm. Code and will be closed if the following conditions are satisfied.

CONDITIONS

Monitoring Well or Remedial System Piping Abandonment
The monitoring wells at the site must be properly abandoned in accordance with ch. NR 141, Wis. Adm. Code. Documentation of well abandonment must be submitted to me on Form 3300-005, found at http://dnr.wi.gov/topic/groundwater/forms.html.

Purge Water, Waste and Soil Pile Removal
Any remaining purge water, waste and/or soil piles generated as part of site investigation or remediation activities must be removed from the site and disposed of or treated in accordance with the applicable rules. Once that work is completed, please send appropriate documentation regarding the treatment or disposal of the remaining purge water, waste and/or soil piles.

Documentation: When the above conditions have been satisfied, please submit the appropriate documentation (for example, well abandonment forms, disposal receipts, copies of correspondence, etc.) to verify that applicable conditions have been met, and your case will be closed.

Your site will be listed on the DNR Remediation and Redevelopment Program's GIS Registry. Information that was submitted with your closure request application will be included on the Bureau for Remediation and Redevelopment Tracking System (BRRTS on the Web). The site may be viewed on the Remediation and Redevelopment Sites Map (RRSM), on the GIS Registry layer. To review the site

on BRRTS on the Web, or to view the GIS Registry web page, see http://dnr.wi.gov/topic/Brownfields/rrsm.html.

CONTINUING OBLIGATIONS

As part of the approval of the closure of this case, you will be responsible for maintaining the following continuing obligations:

- Groundwater contamination is present above ch. NR 140 enforcement standards.
- Residual soil contamination exists that must be properly managed should it be excavated or removed

IN CLOSING

Please be aware that the case may be reopened pursuant to s. NR 727.13, Wis. Adm. Code, for any of the following situations:

- if additional information regarding site conditions indicates that contamination on or from the site poses a threat to public health, safety, or welfare or to the environment,
- if the property owner does not comply with the conditions of closure, with any deed restrictions applied to the property, or with a certificate of completion issued under s. 292.15, Wis. Stats, or
- a property owner fails to maintain or comply with a continuing obligation (imposed under this closure approval letter).

We appreciate your efforts to restore the environment at this site. If you have any questions regarding this letter, please contact me at (920) 662-5420, or by email at Keld.Lauridsen@wisconsin.gov.

Sincerely,

Keld Lauridsen
Hydrogeologist
Remediation & Redevelopment Program

cc: Kendrick Ebbott, Fehr Graham (e-copy - kebbott@fehr-graham.com)

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

Case Closure - GIS Registry

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. Incomplete forms will be considered "administratively incomplete" and processing of the request will stop until required information is provided. Any section of the form not relevant to the case closure request must be fully filled out or explained on a separate page and attached to the relevant section of this form. 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.).

Site Information

BRRTS No. 02-08-561659	Parcel ID No. 211-0000-0000000-0-182018-05-020C		
BRRTS Activity (Site) Name American Finishing Resources	WTM Coordinates X 668204	Y 397052	
Street Address 476 Clay Street	City Chilton	State WI	ZIP Code 53014
Responsible Party (RP) Name Matt Kirchner			
Company Name American Finishing Resources LLC			
Street Address 476 Clay Street	City Chilton	State WI	ZIP Code 53014
Phone Number (920) 849-2800	Email mkirchner@afrnow.com		

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

Environmental Consultant Name Kendrick Ebbott			
Consulting Firm Fehr Graham Inc.			
Street Address 1237 Pilgrim Road	City Plymouth	State WI	ZIP Code 53073
Phone Number (920) 892-2444	Email kebbott@fehr-graham.com		
Acres Ready For Use 4.15	Voluntary Party Liability Exemption Site? ○ Yes ◉ No		

Fees and Mailing of Closure Request

If any section is not relevant to the case closure request, you must fully explain the reasons why and attach that explanation to the relevant section of the form. All information submitted shall be legible. Providing illegible information may result in a submittal being considered incomplete until corrected.

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 Environmental Program Associate at **http://dnr.wi.gov/topic/Brownfields/Contact.html**. Check all fees that apply:

   ☒ $1,050 Closure Fee

   ☒ $300 Database Fee for Soil

   ☒ $350 Database Fee for Groundwater or Other Condition (MW Not Abandoned)

   Total Amount of Payment $ $1,700.00

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 section is not relevant to the case closure request, you must fully explain the reasons why and attach that explanation to the relevant section of the form. All information submitted shall be legible. Providing illegible information may 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 site is located on a generally flat-lying parcel in downtown Chilton, between a rail line and Clay Street

B. **Prior and current site usage**: Specifically describe the current and historic occupancy and types of use.
The property is an active manufacturing facility, and has been for the past 27 years. The facility removes defective paint and other finishes from metal parts using heat and liquids so the parts can be reprocessed.

C. Describe how and when site contamination was discovered.
The contamination was detected in 2006 as part of a baseline Phase II screening of the property conditions prior to acquisition by the current owners

D. Describe the type(s) and source(s) or suspected source(s) of contamination.
The contamination consists of naphthalene, lead, cadmium, and one PAH compound, chrysene, with a likely petroleum source, and does not appear related to current operations, but is likely from historic contamination prior to facility construction.

E. Other relevant site description information (or enter Not Applicable).
The facility location near a rail line and in a relatively low-lying area makes it likely fill was placed on-site years ago prior to construction of the current structures. A nearby property handled petroleum products for many years, and improper disposal of petroleum may have originated from the nearby site.

F. List BRRTS activity site name and number for all other BRRTS activities at this property, including closed cases.
02-08-546649, American Finishing Closed ERP; 07-08-548251 Am Finishing Gen Property Off Site Exempt Denial; 04-08-224136 Thermal Clean, Acid Spill on Floor; 04-08-280066, Miron Const, Mineral Oil Spill

G. List BRRTS activity/site name(s) and number(s) for all properties immediately adjacent to this site, and those impacted by contamination from this site.
None immediately adjacent, and no off-site impacts. Nearby BRRTS sites present across RR track property to north, and one parcel to west.

H. **Current zoning** (e.g. industrial, commercial, residential) for the site and for neighboring properties, and how verified (Provide documentation in Attachment G).
Manufacturing (Tax Bill Classification)

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.
Native soil is silty clay till underlain by silt. Fill present as discussed below.

ii. Describe the composition, location and lateral extent, and depth of fill or waste deposits on the site.
Fill was present beneath the building and north of the building to depths of approximately 5 to 10 feet. Fill includes engineered sand immediately beneath the building floor, silty clay, sand and gravel, and in a small area, sand and gravel with wood and metal debris at a depth of approximately 6 to 8 feet below grade. This material has a petroleum appearance and is the anticipated source material for observed contamination.

iii. Depth to bedrock, bedrock type, and whether or not it was encountered during the investigation.
Based on private well logs nearby, bedrock should be present from 35 to 75 feet below grade, and will consist of dolomite of the Niagara formation. Bedrock was not present during the site investigation borings, which extended to approximately 15 feet.

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 site is covered by a large concrete floor building, with exterior concrete pads, some asphalt parking areas, and some gravel lots. Grass cover and landscaping cover small areas as well.

B. Groundwater

i. **Discuss depth to groundwater and piezometric elevations**. Describe and explain depth variations, and whether free product affects measurement or water table elevation. Describe the stratigraphic unit(s) where water table was found or which were measured for piezometric levels.
The depth to water is approximately 3.5 to 7 feet below grade, and there is no free product. The water table occurs at the approximate fill layer. Based on the nearby topography and work on a nearby site, it appears fill may have been

Save...

historically placed to fill marshy areas.

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

The groundwater flow direction at the site was not directly measured, as the wells were not surveyed for elevation. Work completed on other sites nearby to the west at the same approximate elevation indicates flow is the east or northeast.

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

The hydraulic conductivity at the site was not directly evaluated due to the limited detected contamination. The native silty clay soils will have relatively low hydraulic conductivity values, and the fill will have variable values, depending on the nature of the material used as fill. The site will have a relatively low flow rate, due to the limited hydraulic gradient across the essentially level site.

iv. Identify and describe locations/distance of potable and/or municipal Wells within 1200 feet of the site.

There are no known potable or municipal wells within 1200 feet of the site. The municipal water supply wells are located approximately a mile northeast of the site, and all homes and businesses are supplied with municipal water near the site.

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.

Prior to acquisition and shortly after acquisition in 2006, a Phase II investigation was complete by GZA. One location (GP-3) revealed a detection of elevated levels of naphthalene. Efforts were made to obtain an off-site liability exemption, due to the presence of a petroluem remediation site nearby to the west, but teh DNR indicated further information would be needed. In 2013 and 2014, five geoprobe borings with soil samples and groundwater samples were obtained to evaluate the current conditions. All documentation of activities have previously been submitted to the DNR in letter reports and email submittals from late 2013 through April 2014.

ii. Identify whether contamination extends beyond the source property boundary, describe the off-site media (e.g., soil, groundwater, etc.) impacted, and the vertical and horizontal extent of off-site impacts.

Contamination is limited to a small area of the property beneath the current western building. No off-site contamination is present. Soil sample results indicate the contamination is limited to an interval of fill extending from approximately 6 to 8 feet below grade.

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.

There is a large active manufacturing building covering most of the property and the known impacted soil area. The building has a concrete floor and is in excellent condition.

B. Soil

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

Soil contamination is present at boring GP-3 / GP-11A from a depth of approximately 6 to 8 feet below grade. The contamination is limited in horizontal and vertical extent, based on the results from nearby borings and clean results from a soil samples at GP-11A from 4 to 6 feet and 10 to 11 feet. The extent of contamination measures approximately 20' x 20', with a conservative estimate of 3' in thickness, extending between clean soil samples at 6' and 10' below grade. The contamination appears limited to fill material with a petroleum appearance present only at this location, and the contamination appear to be typically saturated, as the material was likely placed to fill a wet area. The estimated quantity of remaining contaminated soil is approximately 45 cubic yards. There are no receptors or no apparent migration pathways of concern, based on the limited extent of soil or groundwater contamination in nearby borings.

ii. Describe the level and types of **soil contaminants** found in the upper four feet of the soil column.

There are no known elevated levels of contaminants in the surficial four feet of soil at the site, with the exception of arsenic, which is present at concentrations below the DNR background levels of 8.0 mg/kg at all locations.

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.

Soil results were compared to the default WDNR RCLs calculated per NR 720.10, with soil exceeding the leach to groundwater pathway for four compounds, naphthalene, cadmium, lead, and one PAH compound, chrysene. Arsenic

concentrations were compared to teh DNR background threshold value of 8 mg/kg, with no exceedances. The industrial direct contact values were used for evaluation of exceedences for ingestion, with none present.

C. Groundwater

i. Describe degree and extent of groundwater contamination at or from this site. 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.

Groundwater contamination from the most recent results from the site does not exceed the NR140 Enforcement Standard for PAHs, VOCs, or the tested metals lead, cadmium, or arsenic. Groundwater from well TW-11A, in the location of the contaminated soil fill, had results of naphthalene, cadmium, and lead at concentrations above the NR140 PAL. Previous results included results of naphthalene at this location above the NR140 ES. Clean results for VOCs from surrounding borings demonstrates the limited extent of contamination, and clean saturated soil results beneath the contamination indicate the limited vertical extent. There are no known receptors. There are drain tile lines beneath the building, but given the observed concentrations of contaminants in the groundwater, the potential flow of impacted groundwater to the drain lines is considered inconsequential.

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

There is no free product at the site.

D. Vapor

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

The relatively low volatility of the known contaminants of concern (naphthalene, chrysene, cadmium, lead), clean soil chemistry results at shallow soil depths, industrial use of the building, intact concrete floor, and low observed concentrations of contaminants indicates vapor migration is not a concern at this site.

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).

Not assessed

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.

Not assessed, contamination present at depth beneath a building, no surface water or sediment exposure is possible

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.

Not assessed

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.

No remedial actions taken or necessary

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

No immediate or interim actions taken or necessary

C. Describe the *active* remedial actions taken at the site, including: type of remedial system(s) used for each media impacted; 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.

No active remedial actions taken or necessary.

D. Provide a discussion of the nature, degree and extent of residual contamination that will remain at the site or on off-site affected properties after case closure.

Soil containing levels of naphthalene, chrysene, lead, and cadmium above the leach to groundwater RCLs will remain present beneath the building in a small area of soil extending from a depth of approximately 6.5 to 9.5 feet below grade. The concentrations do not exceed the industrial direct contact RCLs. The soil is at the water table interface and typically saturated, and groundwater exceeds the NR 140 PAL for naphthalene, cadmium, and lead at the same location as the contaminated soil.

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E. Describe the remaining soil contamination within four feet of ground surface (direct contact zone) that attains or exceeds Residual Contaminant Levels established under s. NR 720. 12 , the ch. NR720, Wis. Adm. Code, for protection of human health from direct contact.

No soil within four feet of ground surface is known to exceed any soil RCLs, with the exception of arsenic, which is present at concentrations above the regulatory RCLs, but below the DNR accepted background concentration of 8.0 mg/kg at all tested locations.

F. Describe the remaining soil contamination in the vadose zone that attains or exceeds the soil standard(s) for the groundwater pathway.

A small area of fill is present that exceeds the soil to groundwater RCL for naphthalene, cadmium, lead, and chrysene. The horizontal and vertical extent of this contamination has been defined and is quite limited in extent, estimated at consisting of 45 cubic yards, with the majority, if not all, present at or below the typical water table surface. Vadose zone soil containing contamination is likely not present, or only seasonally present, at the top of the contaminated soil interval.

G. 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 soil is covered by a building with a concrete floor, which currently limits infiltration of precipitation vertically downward. However, the contaminated material is present at the water table interface, and represents saturated soil most of the time. The need for a surface cover to limit infiltration is not considered necessary due to the depth of contamination and the small volume (estimated 45 cubic yards) of material. The current groundwater chemistry results indicate that the saturated soil in contact with the water table surface has not resulted in a significant area of elevated groundwater contamination, nor in particularly elevated groundwater contaminant levels. Future removal of the cap, although not planned, is not anticipated to materially affect either the extent or the magnitude of groundwater contamination, as the contaminated material is already in contact with the groundwater on a regular basis.

H. 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).

Concentrations are below NR140 ES's, and are minimal. Levels have dropped from previously higher levels, whether that is due to obtaining a less disturbed sample (longer duration following drilling) or due to stabilizing of the groundwater plume is difficult to say. Regardless, the levels are low, the source of contamination is old, and continued stability or decreasing concentrations should be apparent at the site in the future.

I. Identify how all exposure pathways were removed and/or adequately addressed by immediate and/or remedial action(s) described above in paragraphs, B, C, D, E and F.

No remedial actions taken

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

None remaining in place

K. 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.

An NR140 PAL exemption is needed due to remaining levels of naphthalene, cadmium, and lead in groundwater from GP-11A present above the NR140 PALs. Since previous results exceeded the NR140 ES, a groundwater GIS for the site is also needed.

L. 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.

Not present

M. 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.

Not present

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5. Continuing Obligations: Situations where a maintenance plan(s) and inclusion on DNR's GIS Registry are required.

Directions: Check all that apply to this case closure request:

	This scenario Applies to this Case Closure		Case Closure Scenario: Maintenance Plans and GIS Registry	Maintenance Plan (s) Required in Attachment D	GIS Registry Listing
	A. On-Site	B. Off-Site			
i.	☐	☐	Engineering Control/Barrier for Direct Contact	✓	✓
ii.	☐	☐	Engineering Control/Barrier for Groundwater Infiltration	✓	✓
iii.	☐	☐	Vapor Mitigation - post closure passive system	✓	✓
iv.	☐	☐	Vapor Mitigation - post closure active system	✓	✓
v.	☒	☒	None of the above scenarios apply to this case closure	NA	NA

6. Continuing Obligations: Situations where inclusion on DNR's GIS Registry is required.

Directions: Check all that apply to this case closure request:

	This scenario Applies to this Case Closure		Case Closure Scenario: GIS Registry Only	GIS Registry Listing
	A. On-Site	B. Off-Site		
i.	☒	☐	Residual soil contamination exceeds ch. NR 720 generic or site-specific RCLs	✓
ii.	☒	☐	Sites with groundwater contamination equal to or greater than the ch. NR 140, enforcement standards (ES)	✓
iii.	☐	☐	Monitoring wells: lost, transferred or remaining in use	✓
iv.	☐	☐	Structural Impediment (not as a performance standard)	✓
v.	☐	☐	Residual soil contamination remaining at ch. NR 720 Industrial Use levels	✓
vi.	☐	☐	Vapor intrusion may be future, post-closure issue if building use or land use changes	✓
vii.	☐	☒	None of the above scenarios apply to this case closure	NA

7. 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. SPS 310, Wis. Adm. Code, exist on the property? ○ Yes ◉ No

C. If the answer to question 7b is yes, is the leak detection system currently being monitored? ○ Yes ○ No

Data Tables (Attachment A)

If any section is not relevant to the case closure request, you must fully explain the reasons why and attach that explanation to the relevant section of the form.All information submitted shall be legible. Providing illegible information may result in a submittal being considered incomplete until corrected.

General directions for Data Tables:

- Use bold and italics font on information of importance on tables and figures. Use b**old font** for ch. NR 140, Wis. Adm. Code, groundwater enforcement standard (ES) attainments or exceedances, and *italicized font* for ch. NR 140, Wis. Adm. Code, groundwater preventive action limit (PAL) standard attainments or exceedances.
- 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.

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- 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. Pre-remedial Soil Analytical Table, etc).
- For required documents, each table (e.g., A.1., A.2., etc.,) should be a separate 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, any potable wells and any other wells, extraction wells and any potable wells for which samples have been collected.

A.2. **Pre-remedial Soil Analytical Table(s):** Table(s) showing the soil analytical results and collection dates - prior to conducting the interim and/or remedial action. Indicate if sample was collected above or below the all-time low water table (unsaturated verses saturated).

A.3. **Post-remedial Soil Analytical Table(s):** Table(s) showing the post-remedial action soil analytical results and collection dates. Indicate if sample was collected above or below the all-time low water table (unsaturated verses saturated).

A.4. **Pre and Post Remaining Soil Contamination Soil Analytical Table(s):** Table(s) showing only the pre and post remedial action soil analytical results that exceed a Residual Contaminate Level (RCL) or a Site-Specific Residual Level (SSRCL).

A.5. **Vapor Analytical Table**: 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.6. **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, time period for sample collection, method and results sampling.

A.7. **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.8. **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 and Figures (Attachment B)

If any section is not relevant to the case closure request, you must fully explain the reasons why and attach that explanation to the relevant section of the form. All information submitted shall be legible. Providing illegible information may result in a submittal being considered incomplete until corrected.

General Directions for all Maps and Figures:

- If any map or figure is not relevant to the case closure request, you must fully explain the reason(s) why and attach that explanation (properly labeled with the map/ figure title) in Attachment B.
- 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 11x17 inches, in a portable document format (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.
- Do not use shading or highlights on any of the analytical tables.
- 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.

B.1. Location Maps

B.1.a. **Location Map:** A map outlining all properties within the contaminated site boundaries on a U.S.G.S. topographic map or plat map in sufficient detail to permit easy location of all impacted 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 on-site and applicable off-site 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 exceeding a ch. NR 140 Enforcement Standard (ES), and/or in relation to the boundaries of soil contamination exceeding a Residual Contaminant Level (RCL) established in accordance with the provisions contained in s. NR 720.10 or s. NR 720.12, Wis. Adm. Code.

B.1.c. **RR Site Map:** From RR Sites Map (http://dnrmaps.wi.gov/sl/?Viewer=RR Sites) attach a map depicting the source

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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. **Pre-remedial Soil Contamination:** Figure(s) showing the sample location of all pre-remedial, unsaturated contaminated soil and a single contour showing the horizontal extent of each area of contiguous residual soil contamination that exceeded a Residual Contaminant Level (RCL) established in accordance with the provisions contained in s. NR 720.10 or s. NR 720.12, Wis. Adm. Code.

B.2.b. **Post-remedial Soil Contamination :** Figure(s) showing the sample location of all post-remedial, unsaturated contaminated soil and a single contour showing the horizontal extent of each area of contiguous residual soil contamination that exceeds a Residual Contaminant Level (RCL) established in accordance with the provisions contained in s. NR 720.10 or s. NR 720.12, Wis. Adm. Code. A separate contour line should be used to indicate the extent of residual direct contact exceedances.

B.2.c. **Pre/Post Remaining Soil Contamination:** Figure(s) showing the only location of all pre and post remedial residual soil sample location(s) where unsaturated contaminated soil remains after remediation and a single contour showing the horizontal extent of each area of contiguous residual soil contamination that exceeds a Residual Contaminate Level (RCL) established in accordance with the provisions contained in s. NR 720.10 or s. NR 720.12, Wis. Adm. Code. A separate contour line should be used to indicate the extent of residual direct contact exceedances.

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 a Residual Contaminant Level (RCL) or a Site Specific Residual Contaminant Level (SSRCL).
- Source location(s) and lateral and vertical extent if groundwater contamination exceeds a ch. NR 140 Enforcement Standard (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.1b)

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, Preventive Action Limit (PAL) and/or an Enforcement Standard (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 previously 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 remaining soil and groundwater contamination, including sub-slab, indoor air, soil vapor, 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)

Documentation of Remedial Action (Attachment C)

If any section is not relevant to the case closure request, you must fully explain the reasons why and attach that explanation to the relevant section of the form. All information submitted shall be legible. Providing illegible information may result in a submittal being considered incomplete until corrected.

General Directions:

- 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 is "not applicable" to the site-specific circumstances, include a brief explanation to support that conclusion.
- If the documentation requested below has already been submitted to the Department, please note the title and date of the report for that particular document requested.

C.1. **Site investigation documentation,** that has not otherwise been previously submitted.

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

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C.3. **Provide a description of the methodology used along with all supporting documentation if the Residual Contaminant Levels 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 upon receiving conditional closure.

C.6. **Photos.** For sites 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 should be visible and discernible. Photographs must be labeled with the site name, the features shown, location and the date on which the photograph was taken.

C.7. **Other**. Include any other relevant documentation not otherwise noted above. (This section may remain blank)

Maintenance Plan(s) and Photographs (Attachment D)

If any section is not relevant to the case closure request, you must fully explain the reasons why and attach that explanation to the relevant section of the form. All information submitted shall be legible. Providing illegible information may result in a submittal being considered incomplete until corrected.

When one or more "maintenance plans" are required for a site closure, include in each maintenance plan all required information listed below, and attach the plan(s) in Attachment D. The following "model" maintenance plans can be located at: (1) Maintenance plan for a engineering control or cover: http://dnr.wi.gov/topic/Brownfields/documents/maintenance-plan.pdf; and (2) Maintenance plan for vapor intrusion: http://dnr.wi.gov/topic/Brownfields/documents/appendix5_606.pdf.

D.1. **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) and all property boundaries.

D.2. **Brief descriptions** of the type, depth and location of residual contamination.

D.3. **Description of maintenance action(s)** required for maximizing effectiveness of the engineered control, vapor mitigation system, feature or other action for which maintenance is required.

D.4. **Inspection log**, to be maintained on site, or at a location specified in the maintenance plan or approval letter.

D.5. **Contact information,** including the name, address and phone number of the individual or facility who will be conducting the maintenance.

D.6 Photographs

D.6.a. 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.

D.6.b. Photographs shall be submitted with a title related to the site name and location, and the date on which it was taken.

Monitoring Well Information (Attachment E)

If any section is not relevant to the case closure request, you must fully explain the reasons why and attach that explanation to the relevant section of the form. All information submitted shall be legible. Providing illegible information may result in a submittal being considered incomplete until corrected.

General Directions:

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) for all wells that will remain in-use, be transferred to another party or that could not be located. A figure of these wells should be included in Attachment B.3.d.

Select One:

○ No monitoring wells were required 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 description of efforts made to locate the "lost" wells.

☐ One or more 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).

☐ 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.

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Notifications to Owners of Impacted Properties (Attachment F)

If any section is not relevant to the case closure request, you must fully explain the reasons why and attach that explanation to the relevant section of the form. All information submitted shall be legible. Providing illegible information may result in a submittal being considered incomplete until corrected.

General Directions:

- State law requires that the responsible party provide a 30-day, written advance notice (i.e., a letter) 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 of Form 4400-286, Notification of Residual Contamination and Continuing Obligations, is required under ch. NR 725 for notifying property owners and right-of-way holders about residual contamination affecting their properties, and of continuing obligations which may be imposed. This form can be downloaded at http://dnr.wi.gov/files/PDF/forms/4400/4400-286.pdf.

Check all that apply to the site-specific circumstances of this case closure:

	A. Impacted Source Property and Owner is not Conducting Cleanup	B. Impacted Right of Way	C. Impacted Off-Site Property Owner	Impacted Property Notification Situations: Ch. NR 726 Appendix A Letter
1.	☐	☐	☐	Residual groundwater contamination exceeds Ch. NR 140 Wis. Administrative Code enforcement standards.
2.	☐	☐	☐	Residual soil contamination that attains or exceeds standards is present after the remedial action is complete, and must be properly managed should it be excavated or removed.
3.	☐	☐	☐	An engineered cover or a soil barrier (e.g. pavement) must be maintained over contaminated soil for direct contact or groundwater infiltration concerns.
4.	☐	☐	☐	Industrial land use soil standards were used for the clean-up standard.
5.	☐	☐	☐	A vapor mitigation system (or other specific vapor protection) must be operated and maintained.
6.	☐	☐	☐	Vapor assessment needed if use changes.
7.	☐	☐	☐	Structural impediment.
8.	☐	☐	☐	Lost, transferred or open monitoring wells.
9.	☒	☒	☒	Not Applicable.

If any of the previous boxes in rows 1 thru 8 were checked, include the following as part of Attachment F:

- FORM 4400-246;
- Copy of each letter sent, 30 days or more prior to requesting closure; and
- Proof of receipt for each letter.
- For this site closure, 0 (number) property (ies) has/have been impacted, the owners have been notified, and copies of the letters and receipts are included in Attachment F.

Source Legal Documents (Attachment G)

If any section is not relevant to the case closure request, you must fully explain the reasons why and attach that explanation to the relevant section of the form.All information submitted shall be legible. Providing illegible information may result in a submittal being considered incomplete until corrected.

Include all of the following documents, in this order, in Attachment G:

G.1. **Deeds - Source Property and Other Impacted Properties:** The most recent deed with legal descriptions clearly labeled for (1) the **Source Property** (where the contamination originated) and (2) all **off-source** (off-site) properties where letters were required to be sent per the ch. NR 700, Wis. Adm. Code, rule series (e.g., off-site cover maintenance required, lost monitoring well, off-site cover property impacts to groundwater exceeding the ch. NR 140, Wis. Adm. Code.

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.*

G.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.* (Lots on subdivided or platted property (e.g. lot 2 of xyz subdivision)).

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

G.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.

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Signatures and Findings for Closure Determination

If any section is not relevant to the case closure request, you must fully explain the reasons why and attach that explanation to the relevant section of the form. All information submitted shall be legible. Providing illegible information may result in a submittal being considered incomplete until corrected.

Check the correct box for this case closure request, and have either a professional engineer or a hydrogeologist, as defined in ch. NR 712, Wis. Adm. Code, sign this document.

☒ A response action(s) for this site addresses groundwater contamination (including natural attenuation remedies).

☒ The response action(s) for this site addresses media other than groundwater.

Engineering Certification

I _____ 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 case closure request has been prepared by me or prepared under my supervision 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 case closure request is correct and the document was prepared in compliance with all applicable requirements in chs. NR 700 to 726, Wis. Adm. Code. Specifically, with respect to compliance with the rules, in my professional opinion a site investigation has been conducted in accordance with ch. NR 716, Wis. Adm. Code, and all necessary remedial actions have been completed in accordance with chs. NR 140, NR 718, NR 720, NR 722, NR 724 and NR 726, Wis. Adm. Codes."

Printed Name	Title

Signature	Date	P.E. Stamp and Number

Hydrogeologist Certification

I Kendrick A. Ebbott hereby certify that I am a hydrogeologist as that term is defined in s. NR 712.03 (1), Wis. Adm. Code, and that, to the best of my knowledge, all of the information contained in this case closure request is correct and the document was prepared by me or prepared by me or prepared under my supervision and, in compliance with all applicable requirements in chs. NR 700 to 726, Wis. Adm. Code. Specifically, with respect to compliance with the rules, in my professional opinion a site investigation has been conducted in accordance with ch. NR 716, Wis. Adm. Code, and all necessary remedial actions have been completed in accordance with chs. NR 140, NR 718, NR 720, NR 722, NR 724 and NR 726, Wis. Adm. Codes."

Printed Name	Title
Kendrick A. Ebbott	Project Manager

Signature	Date
Kendrick A. Ebbott	May 21, 2014

Save...

Attachment A – Data Tables

A.1. I Groundwater Analytical Table – Detected VOCs

A.1. II Groundwater Analytical Table – PAHs

A.1. III Groundwater Analytical Table – Metals

A.2. Pre-remedial Soil Analytical Table

A.4 Pre and Post Remaining Soil Contamination Soil Analytical Table

A.7 Water Level Elevations

A.3. Post-Remedial Soil Analytical Table – Not Applicable, No Soil Remediation

A.5 Vapor Analytical Table – Not Applicable, No Volatile Compounds Present

A. 6 Other Media of Concern Table – Not Applicable, No Other Media of Concern

A.8 Other – Not Applicable, no other relevant information obtained

TABLE A.1.I

Groundwater Analytical Table - Detected VOCs

American Finishing Resources

476 Clay Street, Chilton, WI

BRRTS# 02-08-561659

Well Location:		GP-1	GP-2	GP-4	GP-5	GP-6A	GP-7	GP-8	NR 140 ES	NR 140 PAL
Date:		8/9/06	8/9/06	8/9/06	8/9/06	8/9/06	8/9/06	8/9/06		
Water Elevation (feet below TOC):		--	--	--	--	--	--	--		
PVOCs & Detected VOCs										
Benzene	µg/L	ND	ND	ND	ND	ND	ND	ND	5	0.5
Ethylbenzene	µg/L	ND	ND	ND	ND	ND	ND	ND	700	140
Methyl-tert-butyl-ether	µg/L	<0.5	<0.5	1.6	<0.5	<0.5	<0.5	<0.5	60	12
Toluene	µg/L	0.22	0.27	0.27	0.53	0.22	0.64	<0.2	1,000	200
1,2,4-Trimethylbenzene	µg/L	<0.2	<0.2	<0.2	<0.2	<0.2	0.23	<0.2	480	96
1,3,5-Trimethylbenzene	µg/L	ND	ND	ND	ND	ND	ND	ND		
Xylenes, Total	µg/L	<0.5	<0.5	<0.5	<0.5	<0.5	0.58	<0.5	10,000	1,000
Methylene Chloride	µg/L	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	**5**	0.5
Naphthalene	µg/L	<0.25	<0.25	<0.25	<0.25	<0.25	0.29	3.2	**100**	*10*

Well Location:		GP-10	GP-10		GP-3	GP-11A	GP-11A		GP-12	GP-13	GP-14		NR 140 ES	NR 140 PAL
Date:		1/7/14	3/21/14		8/9/06	12/10/13	3/21/14		3/21/14	3/21/14	3/21/14			
Water Elevation (feet below TOC):		--	9.42		--	7.3	7.32		6.96	3.42	7.68			
PVOCs & Detected VOCs														
Benzene	µg/L	<0.50	<0.40		ND	<0.50	<0.99		<0.50	<0.50	<0.50		5	0.5
Ethylbenzene	µg/L	<0.50	<0.39		ND	<0.50	<0.98		<0.50	<0.50	<0.50		700	140
Methyl-tert-butyl-ether	µg/L	<0.49	<0.48		<2.5	<0.49	<1.2		1.9	<0.49	<0.49		60	12
Toluene	µg/L	<0.44	<0.39		<1.0	<0.44	<0.97		<0.44	<0.44	<0.44		1,000	200
1,2,4-Trimethylbenzene	µg/L	<0.42	<0.42		1.1	0.80J	<1.0		<0.50	<0.50	<0.50		480	96
1,3,5-Trimethylbenzene	µg/L	<0.42	<0.42		ND	<0.50	<1.0		<0.50	<0.50	<0.50			
Xylenes, Total	µg/L	<1.32	<1.2		<2.5	<1.32	<3.1		<1.32	<1.32	<1.32		10,000	1,000
Methylene Chloride	µg/L	<0.36	NA		**6.6**	<0.36	NA		<0.36	<0.36	*2.8*		**5**	0.5
Naphthalene	µg/L	<0.42	<0.42		**200**	**283**	*51.8*		<2.5	<2.5	<2.5		**100**	*10*

Notes:

ITALICS = Concentration exceeds NR140 PAL

BOLD = Concentration exceeds NR140 ES

J = Detected value between level of quantification and level of detection

Xylenes reported as total of m-, o-, p-xylenes

NA = Not Analyzed

NS = No standard established

ND = Not Detected, Detection Limit not Known, Results from table, not lab report

TABLE A.1.II

Groundwater Analytical Table - PAH

American Finishing Resources

476 Clay Street, Chilton, WI

BRRTS# 02-08-561659

		NR 140.10 Preventive Action Limit	NR 140.10 Enforcement Standard		
Sample ID					TW-11A
Date					3/21/14
Groundwater Elevation					NA
Acenaphthene	(µg/L)	NS	NS		1.1
Acenaphthylene	(µg/L)	NS	NS		0.025
Anthracene	(µg/L)	600	3,000		0.024
Benzo(a)anthracene	(µg/L)	NS	NS		<0.022
Benzo(a)pyrene	(µg/L)	0.02	0.2		<0.016
Benzo(b)fluoranthene	(µg/L)	0.02	0.2		<0.027
Benzo(k)fluoranthene	(µg/L)	NS	NS		<0.019
Benzo(g,h,i)perylene	(µg/L)	NS	NS		<0.054
Chrysene	(µg/L)	0.02	0.2		<0.034
Dibenzo(a,h)anthracene	(µg/L)	NS	NS		<0.059
Fluoranthene	(µg/L)	80	400		0.021
Fluorene	(µg/L)	80	400		0.33
Indeno(123-cd)pyrene	(µg/L)	NS	NS		<0.054
1-methylnaphthalene	(µg/L)	NS	NS		0.39
2-methylnaphthalene	(µg/L)	NS	NS		0.15
Naphthalene	(µg/L)	10	100		0.19
Phenanthrene	(µg/L)	NS	NS		0.16
Pyrene	(µg/L)	50	250		0.021

Notes:

NS = No standard established

NA = Not analyzed for parameter

ITALICS indicates exceedance of NR 140.10 Preventive Action Limit

BOLD indicates exceedance of NR 140.10 Enforcement Standard

TABLE A.1.III

Groundwater Analytical Table - Metals

American Finishing Resources

476 Clay Street, Chilton, WI

BRRTS# 02-08-561659

		NR 140.10 Preventive Action Limit	NR 140.10 Enforcement Standard		
Sample ID					TW-11A
Date					3/21/14
Groundwater Elevation					NA
Arsenic	(ug/L)	1	10		<4.4
Cadmium	(ug/L)	*0.5*	5		*0.79*
Lead	(ug/L)	*1.5*	15		*1.7*

Notes:

NS = No standard established

NA = Not analyzed for parameter

ITALICS indicates exceedance of NR 140.10 Preventive Action Limit

BOLD indicates exceedance of NR 140.10 Enforcement Standard

TABLE A.2. PRE-REMEDIAL SOIL ANALYTICAL RESULTS
VOC, PAH, and RCRA METAL PARAMETERS
American Finishing Resources, Chilton, WI
476 Clay Street, Chilton, WI
BRRTS# 02-08-561659

Soil Sample Location:		GP-1	GP-3	GP-5	GP-6		GP-7		GP-8	GP-10		GP-11A			GP-12		GP-13		GP-14		Groundwater Pathway RCL	Non-Industrial Direct Contact RCL	Industrial Direct Contact RCL
Sample Depth (feet bgs):		2-4'	6-8'	2-4'	2-4'	6-8'	2-4'	6-8'	4-6'	4-5'	6-7'	4-6'	7-8'	10-11'	2-4'	5-6'	3-4'	6.5-8'	1.25-3'	7-8'			
Sample Collection Date:		8/9/06	8/9/06	8/9/06	8/9/06	8/9/06	8/9/06	8/9/06	8/9/06	12/10/13	12/10/13	12/10/13	12/10/13	12/10/13	3/11/14	3/11/14	3/11/14	3/11/14	3/11/14	3/11/14			
Depth to Groundwater (feet bgs):		NA	NA	NA	NA	NA	NA	NA	NA	9.4	9.4	7.3	7.3	7.3	7.0	7.0	3.4	3.4	7.5	7.5			
Unsaturated (U) or Saturated (S):		U	U	U	U	U	U	U	U	U	U	U	U	S	U	U	U	S	U	U			
Organic Vapor Monitor	ppm	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	1.7	NA	0.0	1.3	1.6	1.1	1.2	0.6	0.0	NS	NS	NS
Diesel Range Organics	mg/kg	NA	17	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NS	NS	NS
PVOCs & Detected VOCs																							
Benzene	µg/kg	NA	ND	NA	ND	NA	ND	NA	NA	<25.0	<25.0	<25.0	<25.0	<25.0	NA	<25.0	NA	<25.0	NA	<25.0	5.1	1,490	7,410
Ethylbenzene	µg/kg	NA	ND	NA	ND	NA	ND	NA	NA	<25.0	<25.0	<25.0	<25.0	<25.0	NA	<25.0	NA	<25.0	NA	<25.0	1,570	7,470	37,000
Methyl-tert-butyl-ether	µg/kg	NA	ND	NA	ND	NA	ND	NA	NA	<25.0	<25.0	<25.0	<25.0	<25.0	NA	<25.0	NA	<25.0	NA	<25.0	27.0	59,400	293,000
Naphthalene	µg/kg	NA	**890**	NA	<61	NA	<57	NA	NA	<25.0	<25.0	<25.0	***5870***	<25.0	NA	<25.0	NA	32.5 J	NA	<25.0	**658.7**	*5,150*	26,000
Toluene	µg/kg	NA	ND	NA	ND	NA	ND	NA	NA	36.0J	<25.0	<25.0	<25.0	<25.0	NA	<25.0	NA	<25.0	NA	<25.0	1,107.2	818,000	818,000
1,2,4-Trimethylbenzene	µg/kg	NA	68	NA	<30	NA	<29	NA	NA	<25.0	<25.0	<25.0	43.0J	<25.0	NA	<25.0	NA	57.3 J	NA	<25.0	1,379.3	89,800	219,000
1,3,5-Trimethylbenzene	µg/kg	NA	ND	NA	ND	NA	ND	NA	NA	<25.0	<25.0	<25.0	<25.0	<25.0	NA	<25.0	NA	<25.0	NA	<25.0		182,000	182,000
Xylenes (total)	µg/kg	NA	ND	NA	ND	NA	ND	NA	NA	<75.0	<75.0	<75.0	<75.0	<75.0	NA	<75.0	NA	30.6 J	NA	<75.0	3,940	258,000	258,000
PAHs																							
Acenaphthene	µg/kg	NA	480	<57	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	<9.2	NA	<9.5	NA	<9.6	NA	NS	3,440,000	33,000,000
Anthracene	µg/kg	NA	270	<5.7	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	<9.6	NA	<9.8	NA	<10	NA	196,744.2	17,200,000	100,000,000
Benzo(a)anthracene	µg/kg	NA	*300*	<5.7	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	<6.4	NA	<6.6	NA	12.5 J	NA	NS	*148*	2,110
Benzo(a)pyrene	µg/kg	NA	*100*	<5.7	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	<6.6	NA	<6.8	NA	12.6 J	NA	470	*15*	211
Benzo(b)fluoranthene	µg/kg	NA	92	<5.7	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	<9.2	NA	<9.5	NA	11.9 J	NA	480	148	2,110
Benzo(ghi)perylene	µg/kg	NA	53	<5.7	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	<7.0	NA	<7.2	NA	<7.3	NA	NS	NS	NS
Benzo(k)fluoranthene	µg/kg	NA	60	<5.7	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	<10.2	NA	<10.5	NA	12.5 J	NA	NS	1,480	21,100
Chrysene	µg/kg	NA	**150**	<5.7	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	<8.6	NA	<8.7	NA	17.0 J	NA	**145.1**	14,800	211,000
Fluoranthene	µg/kg	NA	1,100	<11	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	<9.2	NA	<9.5	NA	26.4	NA	88,817.9	2,290,000	22,000,000
Fluorene	µg/kg	NA	430	<11	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	<9.2	NA	<9.5	NA	<9.6	NA	14,814.8	2,290,000	22,000,000
Indeno(1,2,3-cd)pyrene	µg/kg	NA	54	<5.7	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	<7.0	NA	<7.2	NA	<7.3	NA	NS	148	2,110
2-Methylnaphthalene	µg/kg	NA	1,400	<29	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	<9.2	NA	<9.5	NA	18.8J	NA	NS	229,000	368,000
Naphthalene	µg/kg	NA	480	<34	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	<9.2	NA	<9.5	NA	14.7 J	NA	658.7	2,150	26,000
Phenanthrene	µg/kg	NA	1,400	<5.7	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	<9.2	NA	<9.5	NA	32.1	NA	NS	115,000	115,000
Pyrene	µg/kg	NA	550	<5.7	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	<9.2	NA	<9.5	NA	26.5	NA	54,472.5	1,720,000	16,500,000
RCRA Metals																							
Arsenic*	mg/kg	***4.5***	***4.3***	***3.8***	NA	***2.7***	NA	***6.1***	***4.1***	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	**0.58**	*0.4*	*1.6*
Barium	mg/kg	39	74	42	NA	68	NA	37	65	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	164.8	15,300	100,000
Cadmium	mg/kg	0.15	**1.3**	<0.11	NA	0.68	NA	0.017	0.62	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	**0.75**	70.2	803
Chromium	mg/kg	11	12	13	NA	16	NA	12	15	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	360,000	NS	NS
Lead	mg/kg	5.6	**58**	4.8	NA	11	NA	5.2	15	NA	NA	NA	NA	NA	5.6	NA	6.1	NA	10.9	NA	**27**	400	800
Mercury	mg/kg	0.012	0.047	0.011	NA	0.038	NA	<0.011	0.038	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.21	3.1	3.1

Notes:
* Arsenic Threshold Value Naturally Occuring Background Level is 8.0 mg/kg per DNR Publication RR-940
ITALICS = Concentration exceeds Non-Industrial OR Industrial Direct Contact RCL (unsaturated soil samples only)
BOLD = Concentration exceeds Groundwater Pathway RCL (unsaturated soil samples only)
Xylenes reported as total of m-, o-, p-xylenes
NS = No standard established
NA = Not analyzed for parameter
ND = Not Detected, Detection Limit not Known

TABLE A.4. PRE- AND POST-REMEDIAL SOIL ANALYTICAL RESULTS
VOC, PAH, and RCRA METAL PARAMETERS
American Finishing Resources, Chilton, WI
476 Clay Street, Chilton, WI
BRRTS# 02-08-561659

Soil Sample Location:		GP-3	GP-11A			Groundwater Pathway RCL	Non-Industrial Direct Contact RCL	Industrial Direct Contact RCL
Sample Depth (feet bgs):		6-8'	4-6'	7-8'	10-11'			
Sample Collection Date:		8/9/06	12/10/13	12/10/13	12/10/13			
Depth to Groundwater (feet bgs):		NA	7.3	7.3	7.3			
Unsaturated (U) or Saturated (S):		U	U	U	S			
Organic Vapor Monitor	ppm	NA	1.7	NA	0.0	NS	NS	NS
Diesel Range Organics	mg/kg	17	NA	NA	NA	NS	NS	NS
PVOCs & Detected VOCs								
Benzene	µg/kg	ND	<25.0	<25.0	<25.0	5.1	1,490	7,410
Ethylbenzene	µg/kg	ND	<25.0	<25.0	<25.0	1,570	7,470	37,000
Methyl-tert-butyl-ether	µg/kg	ND	<25.0	<25.0	<25.0	27.0	59,400	293,000
Naphthalene	µg/kg	**890**	<25.0	***5870***	<25.0	**658.7**	*5,150*	26,000
Toluene	µg/kg	ND	<25.0	<25.0	<25.0	1,107.2	818,000	818,000
1,2,4-Trimethylbenzene	µg/kg	68	<25.0	43.0	<25.0	1,379.3	89,800	219,000
1,3,5-Trimethylbenzene	µg/kg	ND	<25.0	<25.0	<25.0		182,000	182,000
Xylenes (total)	µg/kg	ND	<75.0	<75.0	<75.0	3,940	258,000	258,000
PAHs								
Acenaphthene	µg/kg	480	NA	NA	NA	NS	3,440,000	33,000,000
Anthracene	µg/kg	270	NA	NA	NA	196,744.2	17,200,000	100,000,000
Benzo(a)anthracene	µg/kg	*300*	NA	NA	NA	NS	*148*	2,110
Benzo(a)pyrene	µg/kg	*100*	NA	NA	NA	470	*15*	211
Benzo(b)fluoranthene	µg/kg	92	NA	NA	NA	480	148	2,110
Benzo(ghi)perylene	µg/kg	53	NA	NA	NA	NS	NS	NS
Benzo(k)fluoranthene	µg/kg	60	NA	NA	NA	NS	1,480	21,100
Chrysene	µg/kg	**150**	NA	NA	NA	**145.1**	14,800	211,000
Fluoranthene	µg/kg	1,100	NA	NA	NA	88,817.9	2,290,000	22,000,000
Fluorene	µg/kg	430	NA	NA	NA	14,814.8	2,290,000	22,000,000
Indeno(1,2,3-cd)pyrene	µg/kg	54	NA	NA	NA	NS	148	2,110
2-Methylnaphthalene	µg/kg	1,400	NA	NA	NA	NS	229,000	368,000
Naphthalene	µg/kg	480	NA	NA	NA	658.7	2,150	26,000
Phenanthrene	µg/kg	1,400	NA	NA	NA	NS	115,000	115,000
Pyrene	µg/kg	550	NA	NA	NA	54,472.5	1,720,000	16,500,000
RCRA Metals								
Arsenic*	mg/kg	***4.3***	NA	NA	NA	**0.58**	*0.4*	*1.6*
Barium	mg/kg	74	NA	NA	NA	164.8	15,300	100,000
Cadmium	mg/kg	**1.3**	NA	NA	NA	**0.75**	70.2	803
Chromium	mg/kg	12	NA	NA	NA	360,000	NS	NS
Lead	mg/kg	**58**	NA	NA	NA	**27**	400	800
Mercury	mg/kg	0.047	NA	NA	NA	0.21	3.1	3.1

Notes:
* Arsenic Threshold Value Naturally Occuring Background Level is 8.0 mg/kg per DNR Publication RR-940
ITALICS = Concentration exceeds Non-Industrial OR Industrial Direct Contact RCL (unsaturated soil samples only)
BOLD = Concentration exceeds Groundwater Pathway RCL (unsaturated soil samples only)
Xylenes reported as total of m-, o-, p-xylenes
NS = No standard established
NA = Not analyzed for parameter
ND = Not Detected, Detection Limit not Known

TABLE A.7
Water Level Elevations
Site Name: American Finishing Resources
Site Address 476 Clay Street, Chilton, WI
BRRTS# BRRTS# 02-08-561659

Well Identification	TW-10	TW-11A	TW-12	TW-13
Top of Casing Elevation (ft RLB)*	100	100	100	100
Ground Surface Elevation (ft. RLB)*	100	100	99	99
Stickup	0	0	1	1
Screened Elevation (ft RSL)*	95.8-85.8	95.3-85.3	96.8-86.8	95.7-85.7

Well Identification	TW-14
Top of Casing Elevation (ft MSL)	100
Ground Surface Elevation (ft. MSL)	100
Stickup	0
Screened Elevation (ft MSL)	96 - 86

	TW-10			TW-11A			TW-12		
Sample Date	Depth to Water (ft below PVC Lip)	Depth to Water (below grade)	Ground water Elev. (ft msl)	Depth to Water (ft below PVC Lip)	Depth to Water (below grade)	Ground water Elev. (ft msl)	Depth to Water (ft below PVC Lip)	Depth to Water (below grade)	Ground water Elev. (ft msl.)
12/10/2013	dry	<14.2	<85.8	7.30	7.30	92.70	Not Present		
3/20/2014	7.35	7.35	92.65	7.31	7.31	92.69	7.00	6.00	93.00
3/21/2014	9.42	9.42	90.58	7.32	7.32	92.68	6.96	5.96	93.04

	TW-13			TW-14			
Sample Date	Depth to Water (ft below PVC Lip)	Depth to Water (below grade)	Groundwater Elev. (ft msl)	Depth to Water (ft below PVC Lip)	Depth to Water (below grade)	Groundwater Elev. (ft msl)	
3/20/2014	7.58	6.58	92.42	7.30	7.30	92.70	
3/21/2014	3.42	2.42	96.58	7.68	7.68	92.32	

* Site NOT Surveyed - elevations estimated using 100' as datum for building floor

NA: Not Analyzed

ft RLB: feet relative to local benchmark, set to 100 feet, based on factory concrete floor

Attachment B - Maps and Figures

B.1.a Location Map

B.1.b Detailed Site Map

B.1.c RR Site Map

B.2.a Pre-remedial Soil Contamination

B.2.c Pre/Post Remaining Soil Contamination

B.3.a Geologic Cross Section

B.3.b. Groundwater Isoconcentration

B.3.d Monitoring Wells

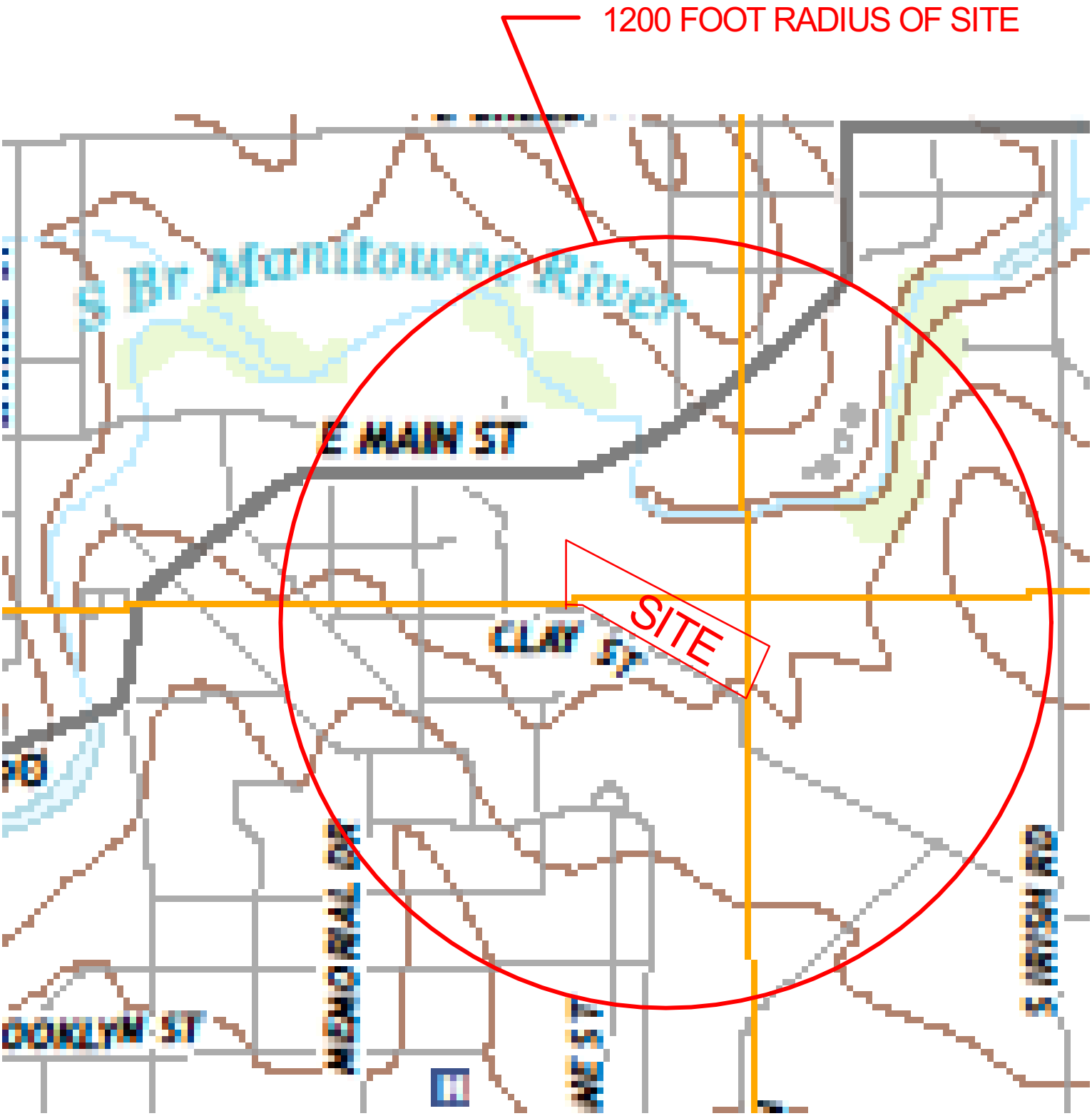
B.2.b Post-remedial Soil Contamination (not applicable, no soil remediation)

B.3.c Groundwater Elevation and Flow (Site Not Surveyed)

B.4.a Vapor Intrusion Map (Not Applicable, no volatile compounds present)

B.4.b Other Media of Concern (Not Applicable, none present)

B.4.c Other (Not Applicable, None Present)

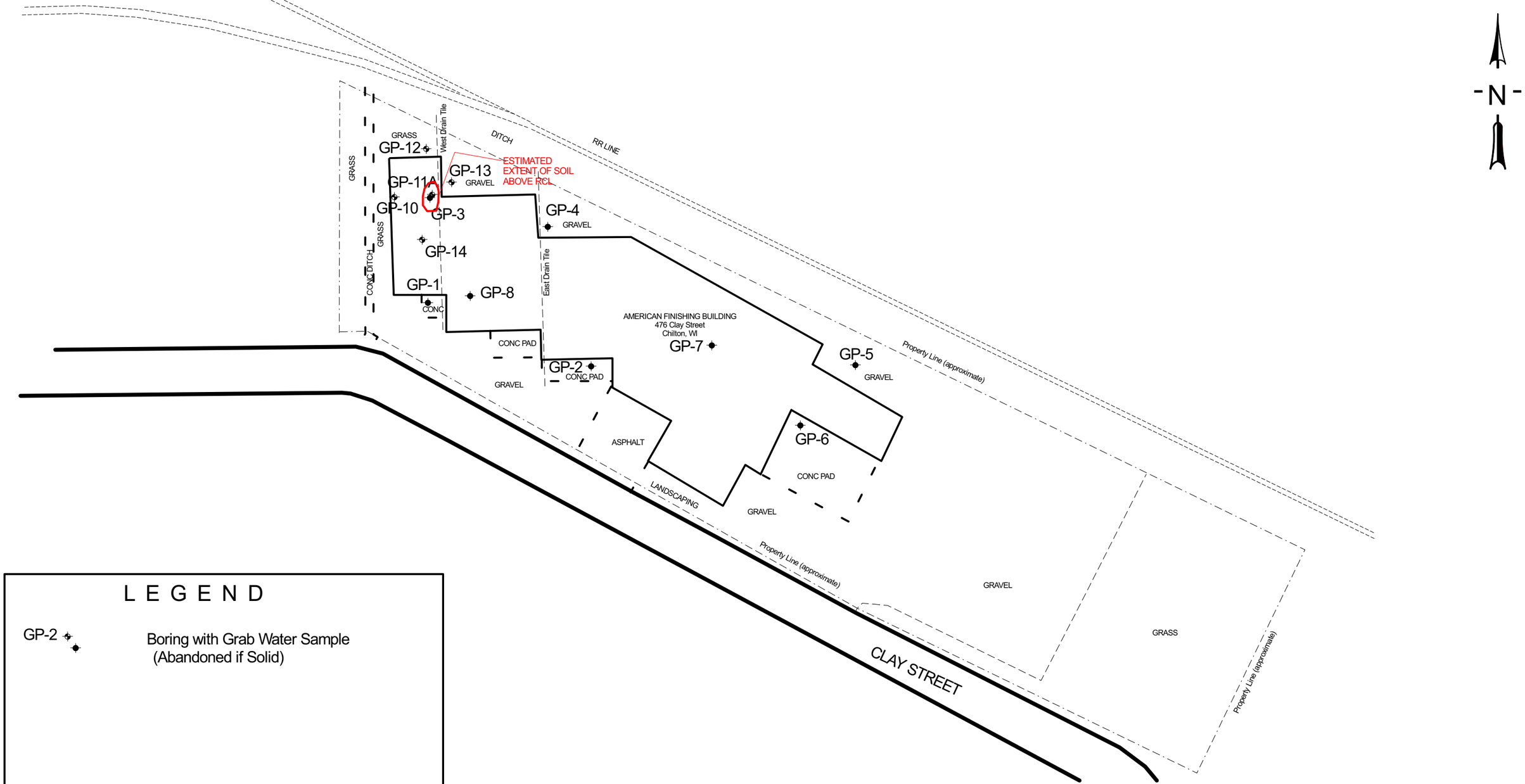


Base Map from USGS Topographic Series, Chilton 7.5' Quadrangle
Contour Inteval 10'

No Municipal or Private Wells Known to be Active within 1200' Radius

N

TITLE: Location Map			ALPHA TERRA SCIENCE
SITE: American Finishing Resources			
SCALE: Approx 1 : 5400	ATS PROJECT NUMBER: 14-1101	DATE: 4/24/14	DWG #:.. topo.skf
REV: / DATE:	DESCRIPTION: Topographic Map	APPVD.: / DRAWN BY: KE	FIGURE B.1.a



L E G E N D

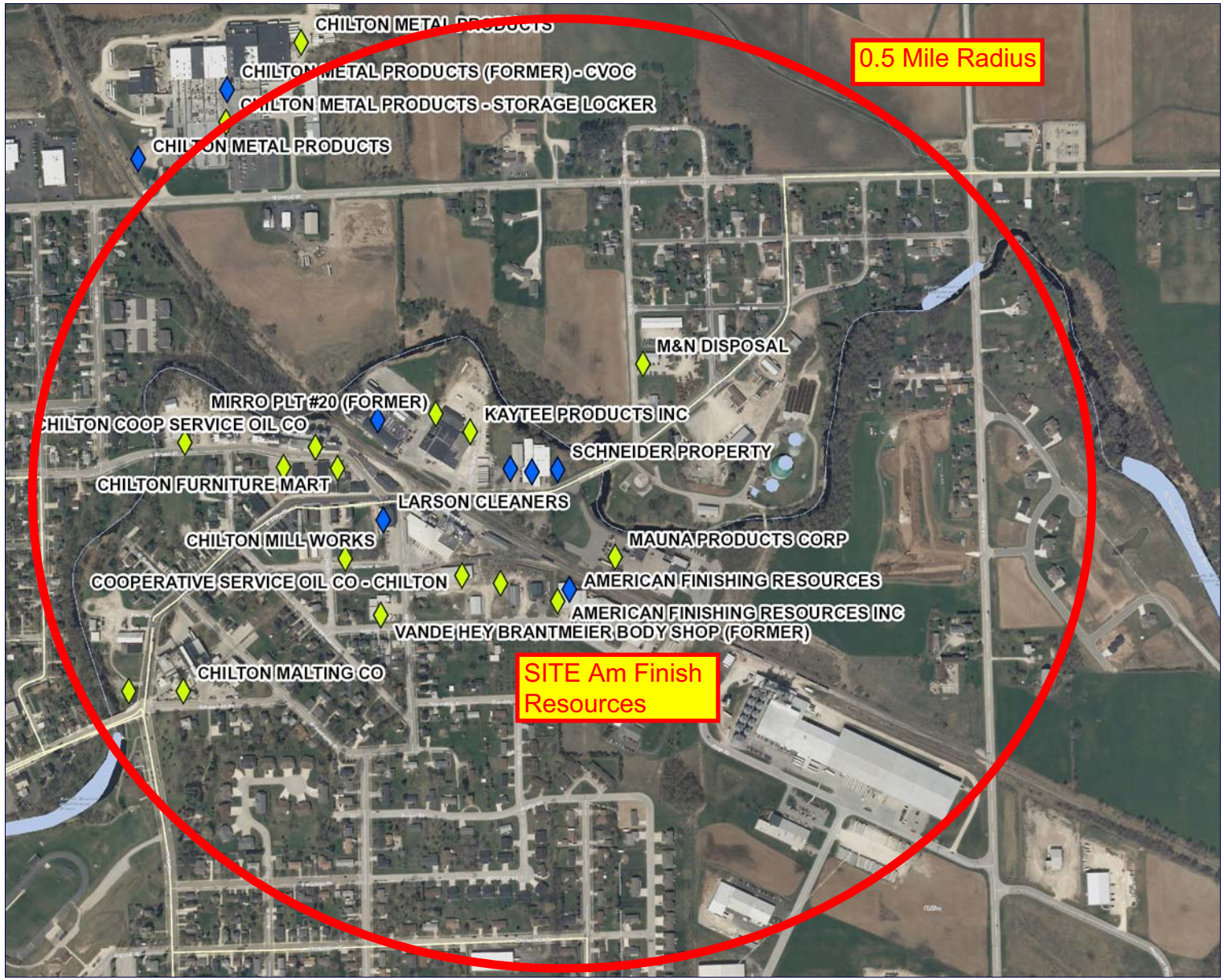
GP-2 Boring with Grab Water Sample (Abandoned if Solid)

0 20 40 60 80

SCALE: 1 INCH = 80 FEET

TITLE: DETAILED SITE MAP				ALPHA TERRA SCIENCE	
SITE: American Finishing Resources					
SCALE: 1"=80'	PROJECT NUMBER: 14-1101			DATE: 4/23/14	DWG #:.. 80ledger.skf
REV:	DATE:	DESCRIPTION:	APPVD.:	DRAWN BY: KE	FIGURE B.1.b

Figure B.1.c RR Site Map



Legend

- Open Site (ongoing cleanup)
- Open Site Boundary
- Closed Site (completed cleanup)
- Closed Site Boundary
- Airport
- 2010 Air Photos (WROC)
- Cities
- Villages

0.3 0 0.14 0.3 Miles

NAD_1983_HARN_Wisconsin_TM

1: 8,905

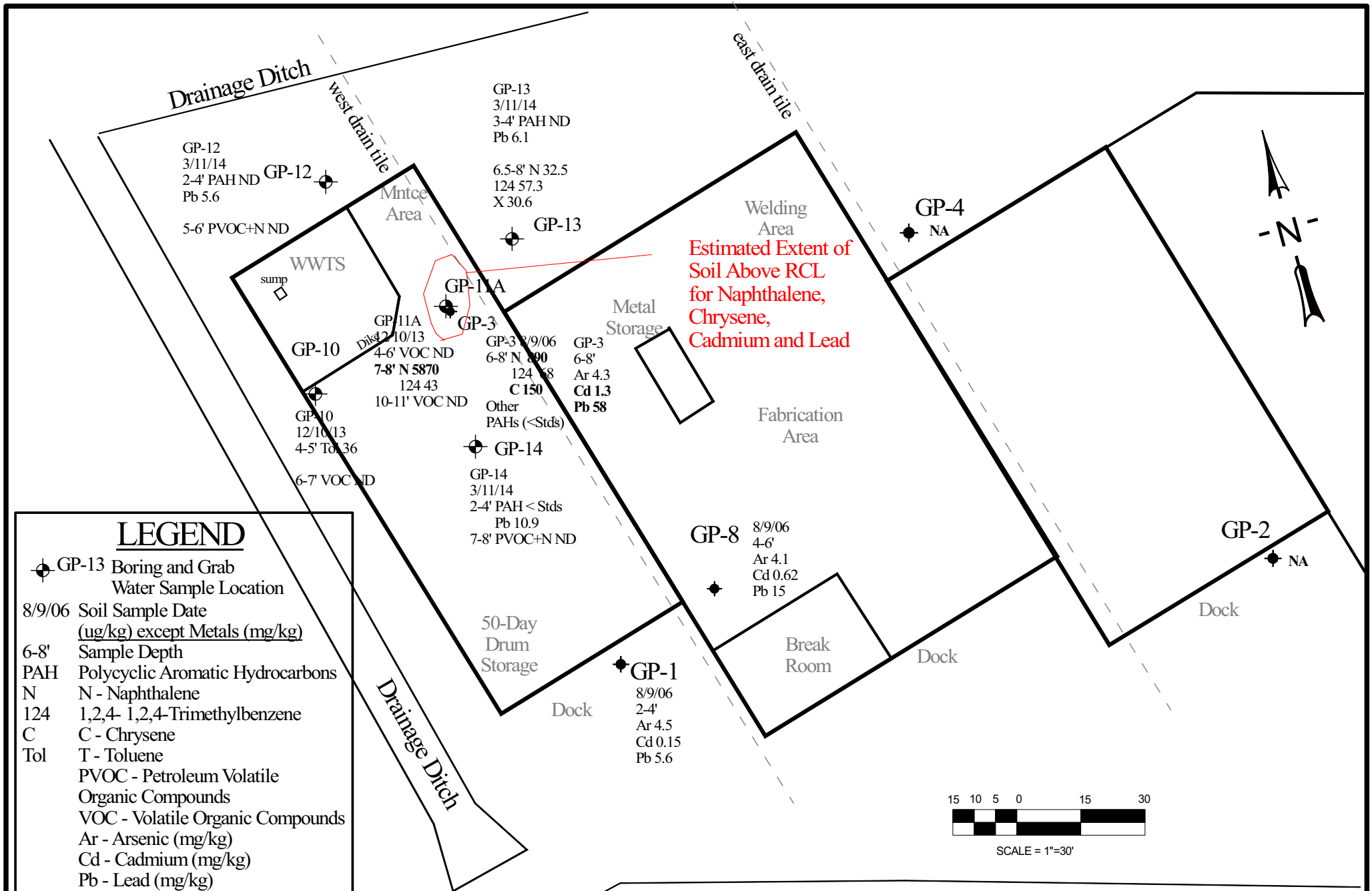
© Latitude Geographics Group Ltd.

DISCLAIMER: The information shown on these maps has been obtained from various sources, and are of varying age, reliability and resolution. These maps are not intended to be used for navigation, nor are these maps an authoritative source of information about legal land ownership or public access. No warranty, expressed or implied, is made aregarding accuracy, applicability for a particular use, completemenss, or legality of the information depicted on this map. For more information, see the DNR Legal Notices web page: http://dnr.wi.gov/org/legal/

Note: Not all sites are mapped.

Notes

Site is American Finishing Resources



LEGEND

GP-13 Boring and Grab Water Sample Location

8/9/06 Soil Sample Date

(ug/kg) except Metals (mg/kg)

6-8' Sample Depth

PAH Polycyclic Aromatic Hydrocarbons

N N - Naphthalene

124 1,2,4- 1,2,4-Trimethylbenzene

C C - Chrysene

Tol T - Toluene

PVOC - Petroleum Volatile Organic Compounds

VOC - Volatile Organic Compounds

Ar - Arsenic (mg/kg)

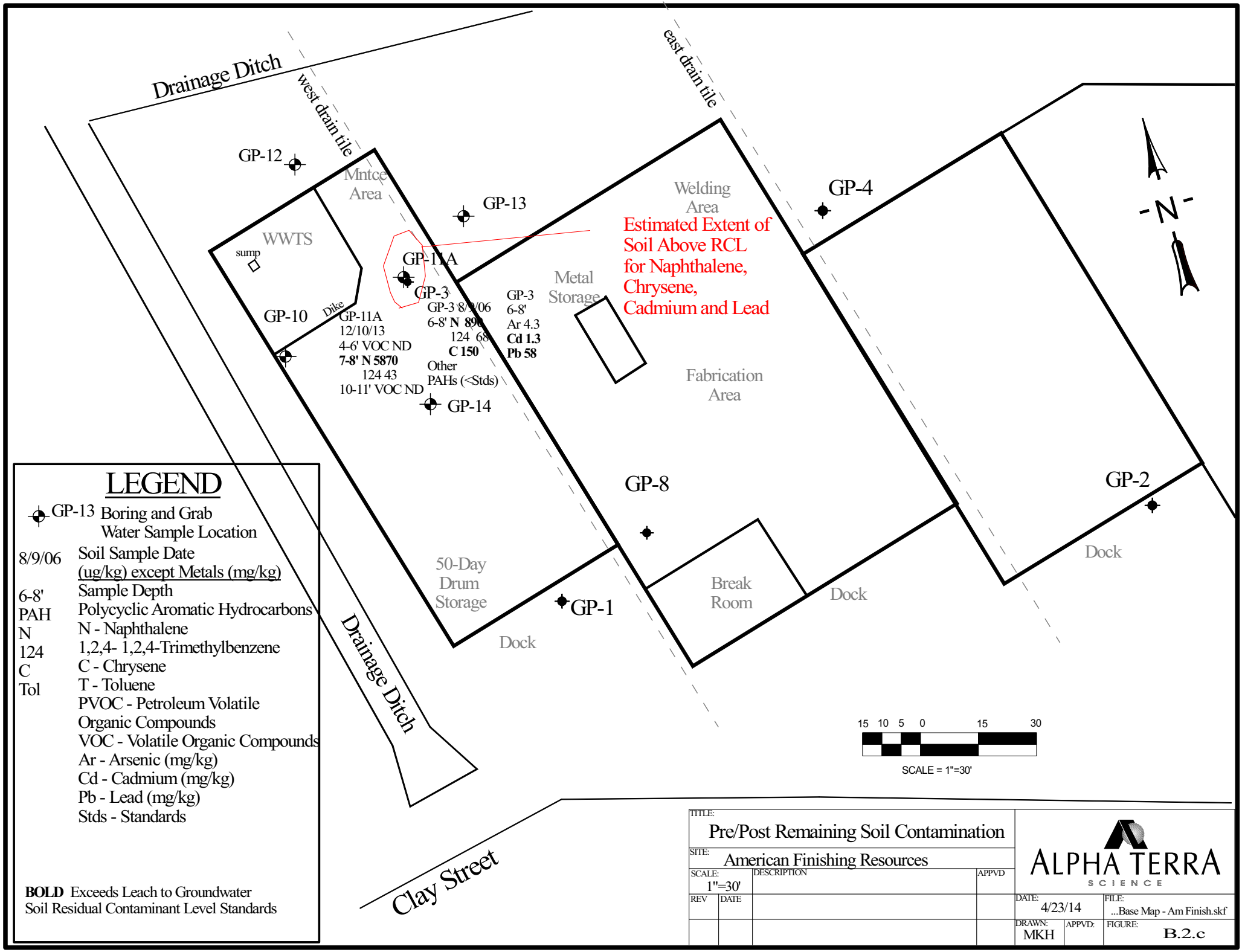
Cd - Cadmium (mg/kg)

Pb - Lead (mg/kg)

Stds - Standards

BOLD Exceeds Leach to Groundwater Soil Residual Contaminant Level Standards

TITLE: Pre-remedial Soil Contamination			ALPHA TERRA SCIENCE
SITE: American Finishing Resources			
SCALE: 1"=30'	DESCRIPTION	APPVD	
REV	DATE		DATE: 4/23/14 FILE: ...Base Map - Am Finish.skf
			DRAWN: MKH APPVD: FIGURE: B.2.a



LEGEND

GP-13 Boring and Grab Water Sample Location

8/9/06 Soil Sample Date

(ug/kg) except Metals (mg/kg)

6-8' Sample Depth

PAH Polycyclic Aromatic Hydrocarbons

N - Naphthalene

124 1,2,4- 1,2,4-Trimethylbenzene

C - Chrysene

Tol T - Toluene

PVOC - Petroleum Volatile Organic Compounds

VOC - Volatile Organic Compounds

Ar - Arsenic (mg/kg)

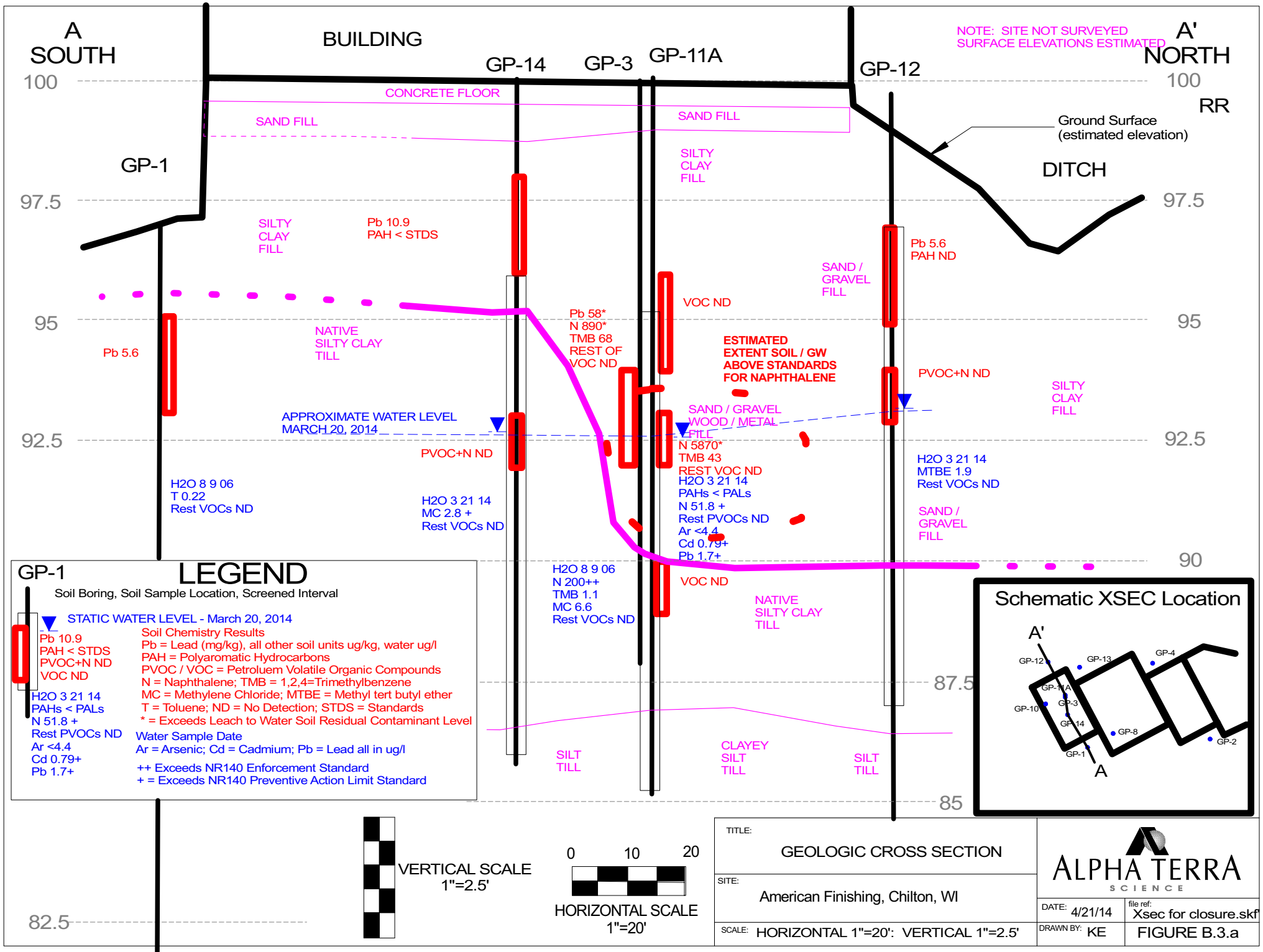
Cd - Cadmium (mg/kg)

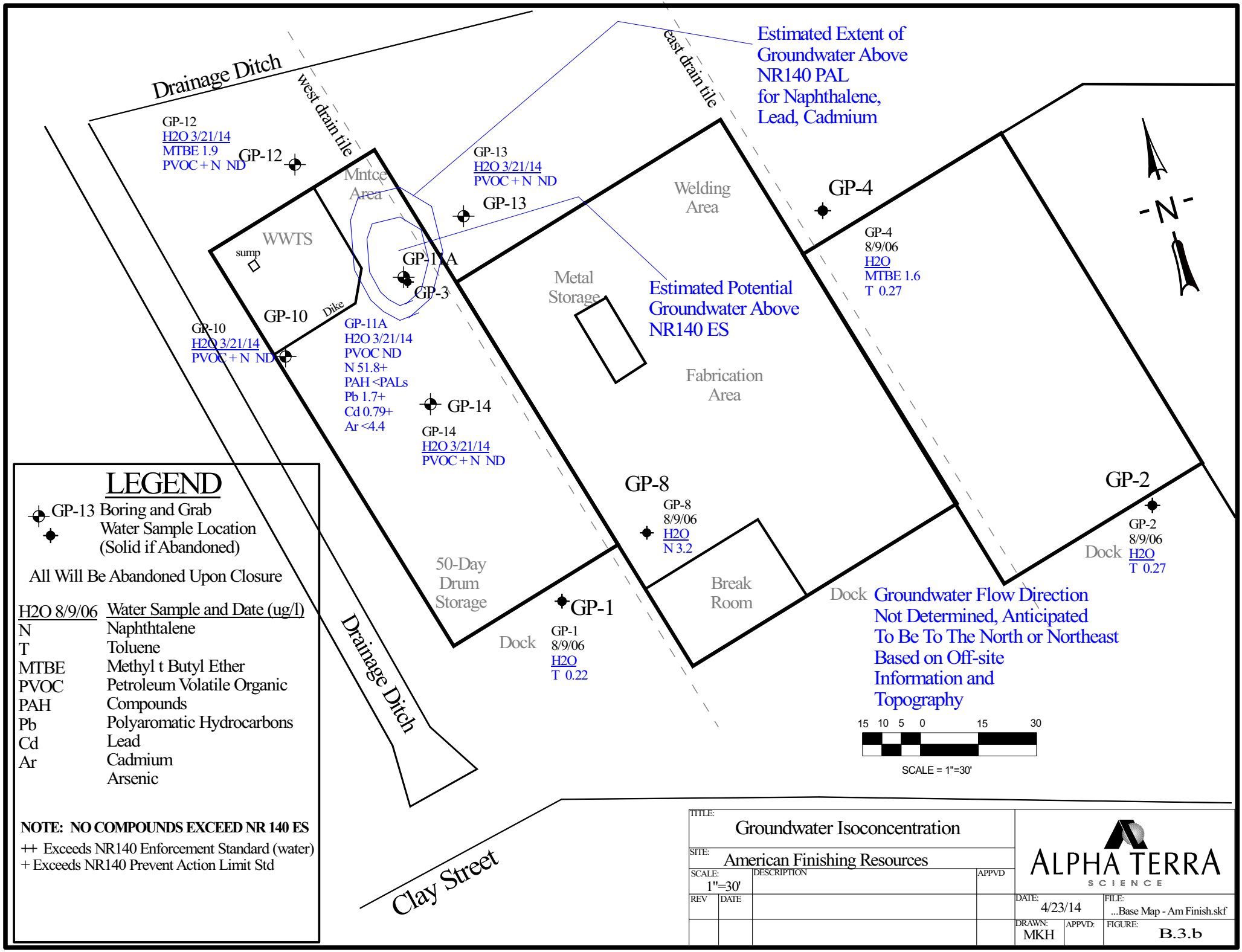
Pb - Lead (mg/kg)

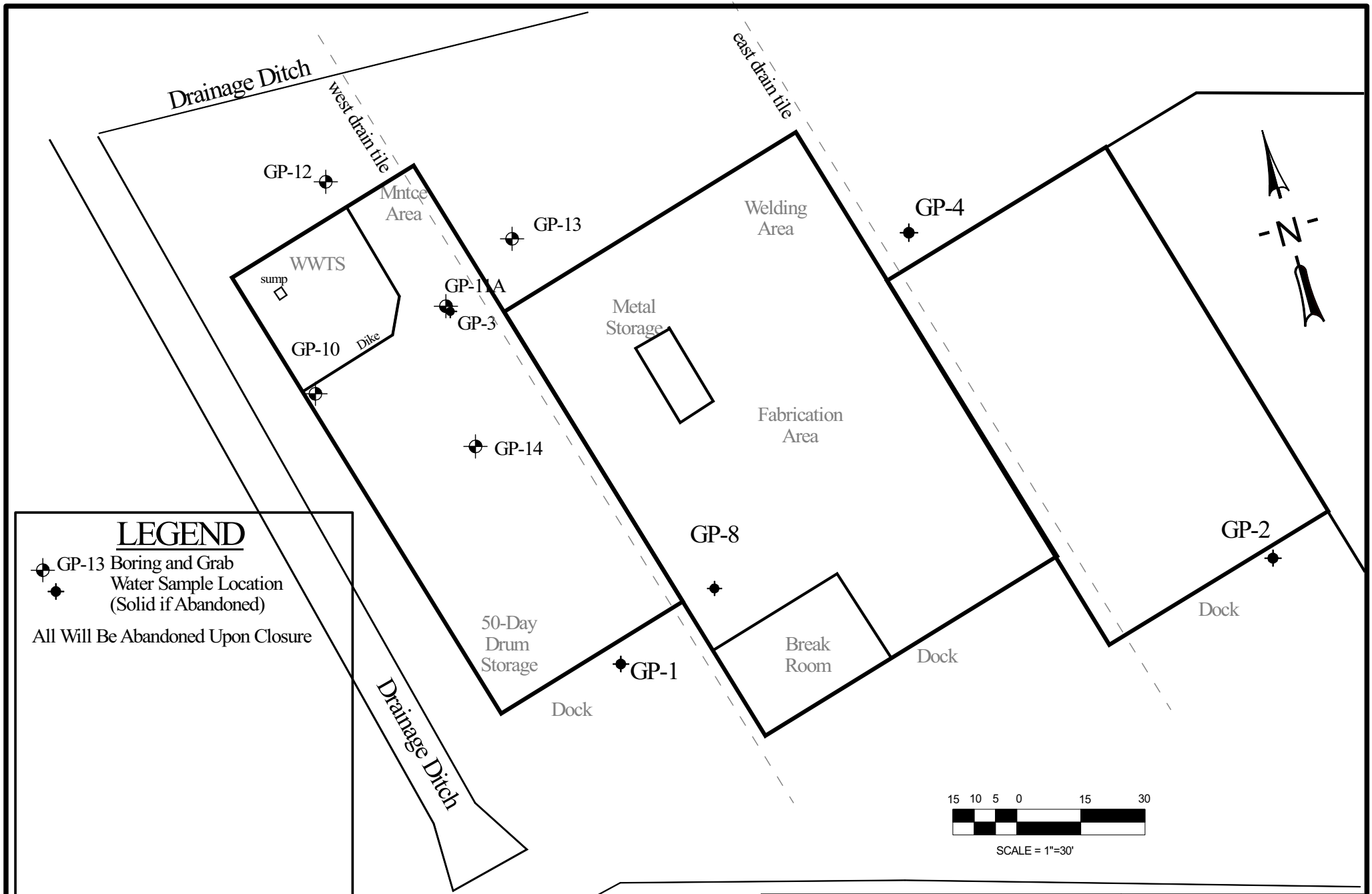
Stds - Standards

BOLD Exceeds Leach to Groundwater Soil Residual Contaminant Level Standards

TITLE: Pre/Post Remaining Soil Contamination			ALPHA TERRA SCIENCE
SITE: American Finishing Resources			
SCALE: 1"=30'	DESCRIPTION	APPVD	
REV / DATE			DATE: 4/23/14 / FILE: ...Base Map - Am Finish.skf
			DRAWN: MKH / APPVD: / FIGURE: B.2.c


A
SOUTH
BUILDING
GP-14
GP-3
GP-11A
GP-12
NOTE: SITE NOT SURVEYED
SURFACE ELEVATIONS ESTIMATED
A'
NORTH
100
97.5
95
92.5
90
87.5
85
82.5
CONCRETE FLOOR
SAND FILL
SAND FILL
RR
Ground Surface
(estimated elevation)
DITCH
GP-1
SILTY
CLAY
FILL
SILTY
CLAY
FILL
Pb 10.9
PAH < STDS
Pb 5.6
PAH ND
SAND /
GRAVEL
FILL
VOC ND
Pb 58*
N 890*
TMB 68
REST OF
VOC ND
NATIVE
SILTY CLAY
TILL
Pb 5.6
ESTIMATED
EXTENT SOIL / GW
ABOVE STANDARDS
FOR NAPHTHALENE
PVOC+N ND
SILTY
CLAY
FILL
APPROXIMATE WATER LEVEL
MARCH 20, 2014
SAND / GRAVEL
WOOD / METAL
FILL
N 5870*
TMB 43
REST VOC ND
H2O 3 21 14
PAHs < PALs
N 51.8 +
Rest PVOCs ND
Ar <4.4
Cd 0.79+
Pb 1.7+
PVOC+N ND
H2O 3 21 14
MTBE 1.9
Rest VOCs ND
H2O 8 9 06
T 0.22
Rest VOCs ND
H2O 3 21 14
MC 2.8 +
Rest VOCs ND
SAND /
GRAVEL
FILL
H2O 8 9 06
N 200++
TMB 1.1
MC 6.6
Rest VOCs ND
VOC ND
NATIVE
SILTY CLAY
TILL
SILT
TILL
CLAYEY
SILT
TILL
SILT
TILL
GP-1
LEGEND
Soil Boring, Soil Sample Location, Screened Interval
STATIC WATER LEVEL - March 20, 2014
Pb 10.9
PAH < STDS
PVOC+N ND
VOC ND
H2O 3 21 14
PAHs < PALs
N 51.8 +
Rest PVOCs ND
Ar <4.4
Cd 0.79+
Pb 1.7+
Soil Chemistry Results
Pb = Lead (mg/kg), all other soil units ug/kg, water ug/l
PAH = Polyaromatic Hydrocarbons
PVOC / VOC = Petroluem Volatile Organic Compounds
N = Naphthalene; TMB = 1,2,4=Trimethylbenzene
MC = Methylene Chloride; MTBE = Methyl tert butyl ether
T = Toluene; ND = No Detection; STDS = Standards
* = Exceeds Leach to Water Soil Residual Contaminant Level
Water Sample Date
Ar = Arsenic; Cd = Cadmium; Pb = Lead all in ug/l
++ Exceeds NR140 Enforcement Standard
+ = Exceeds NR140 Preventive Action Limit Standard
Schematic XSEC Location
A'
GP-12
GP-13
GP-4
GP-11A
GP-10
GP-3
GP-14
GP-8
GP-2
GP-1
A
VERTICAL SCALE
1"=2.5'
0
10
20
HORIZONTAL SCALE
1"=20'
TITLE:
GEOLOGIC CROSS SECTION
SITE:
American Finishing, Chilton, WI
SCALE: HORIZONTAL 1"=20': VERTICAL 1"=2.5'
ALPHA TERRA
SCIENCE
DATE: 4/21/14
file ref: Xsec for closure.skf
DRAWN BY: KE
FIGURE B.3.a


Drainage Ditch
west drain tile
east drain tile
Estimated Extent of Groundwater Above NR140 PAL for Naphthalene, Lead, Cadmium
GP-12
H2O 3/21/14
MTBE 1.9
PVOC + N ND
GP-12
Mntce Area
GP-13
H2O 3/21/14
PVOC + N ND
GP-13
Welding Area
GP-4
GP-4
8/9/06
H2O
MTBE 1.6
T 0.27
WWTS
sump
GP-11A
GP-3
Metal Storage
Estimated Potential Groundwater Above NR140 ES
GP-10
Dike
GP-10
H2O 3/21/14
PVOC + N ND
GP-11A
H2O 3/21/14
PVOC ND
N 51.8+
PAH <PALs
Pb 1.7+
Cd 0.79+
Ar <4.4
GP-14
GP-14
H2O 3/21/14
PVOC + N ND
Fabrication Area
GP-8
GP-8
8/9/06
H2O
N 3.2
GP-2
GP-2
8/9/06
H2O
T 0.27
Dock
50-Day Drum Storage
GP-1
GP-1
8/9/06
H2O
T 0.22
Dock
Break Room
Dock
Groundwater Flow Direction Not Determined, Anticipated To Be To The North or Northeast Based on Off-site Information and Topography
15 10 5 0 15 30
SCALE = 1"=30'
-N-
Drainage Ditch
Clay Street
LEGEND
GP-13 Boring and Grab Water Sample Location (Solid if Abandoned)
All Will Be Abandoned Upon Closure
H2O 8/9/06 Water Sample and Date (ug/l)
N Naphthtalene
T Toluene
MTBE Methyl t Butyl Ether
PVOC Petroleum Volatile Organic
PAH Compounds
Pb Polyaromatic Hydrocarbons
Cd Lead
Ar Cadmium
Arsenic
NOTE: NO COMPOUNDS EXCEED NR 140 ES
++ Exceeds NR140 Enforcement Standard (water)
+ Exceeds NR140 Prevent Action Limit Std
TITLE: Groundwater Isoconcentration
SITE: American Finishing Resources
SCALE: 1"=30'
DESCRIPTION
APPVD
REV
DATE
ALPHA TERRA SCIENCE
DATE: 4/23/14
FILE: ...Base Map - Am Finish.skf
DRAWN: MKH
APPVD:
FIGURE: B.3.b



TITLE: Monitoring Wells			ALPHA TERRA SCIENCE
SITE: American Finishing Resources			
SCALE: 1"=30'	DESCRIPTION	APPVD	
REV	DATE		DATE: 4/23/14 / FILE: ...Base Map - Am Finish.skf
			DRAWN: MKH / APPVD: / FIGURE: B.3.d

Attachment C - Documentation of Remedial Action

NONE SUBMITTED – ALL NOT APPLICABLE

C.1 Site Investigation Documentation – Not Applicable (all documentation has previously been submitted)

C.2 Investigation Waste Disposal Documentation – Not Applicable, no investigative waste derived (Geoprobe investigation)

C.3 RCL Methodology – Not Applicable, used default DNR Values

C.4 Construction Documentation – Not Applicable – no remedial action or interim action

C.5 Decommissioning of Remedial Systems – Not Applicable, no remediation systems present

C.6 Photos – No Applicable, no cover, performance standard, structural impediments or vapor mitigation system installed.

C.7 Other – Not Applicable, No other information

Attachment D - Maintenance Plan

D.1 to D.6 NONE SUBMITTED, NOT NECESSARY DUE TO SMALL AREA OF IMPACTED SOIL PRESENT AT OR BELOW WATER TABLE SURFACE, CAP NOT NEEDED TO PROTEC THE GROUNDWATER, AND GROUNDWATER ONLY MINIMALLY IMPACTED

Attachment E - Monitoring Well Information

All Monitoring Wells will be abandoned per state code upon conditional closure notification

Attachment F - Notifications to Owners of Impacted Properties

The contamination did not migrate off the source property, so no notification letters needed to be sent.

Attachment G - Source Legal Documents

G.1 Deed Source Property

G.2 Certified Survey Map

G.3 Verification of Zoning

G.4 Signed Statement

Attachment G.1 - Deeds

Document #: 407971

Document Number

State Bar of Wisconsin Form 2-2003
WARRANTY DEED

Document Name

Register of Deeds
Calumet County, WI

Received for Record
Date: 8/03/06 13:43
Tr Fee: 3,115.50 Code:
Debra L. Tasch

THIS DEED, made between American Finishing Resources, Inc. ("Grantor," whether one or more), and BGS Acquisition, LLC ("Grantee," whether one or more).

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

See Attached Exhibit A.

Together with all appurtenant rights, title and interests.

Recording Area

Name and Return Address

John J. Lott
Reinhart Boerner Van Deuren, S.C.
1000 North Water Street
Suite 2100
Milwaukee, WI 53202

211-0000-0000000-000-0-182018-05-020C
Parcel Identification Number (PIN)

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

xceptions to warranties:

rantor warrants that the title to the Property is good, indefeasible in fee simple and free and clear of encumbrances, except as shown on the attached Exhibit B.

Dated this 27th day of July, 2006.

AMERICAN FINISHING RESOURCES, INC.

*By: Steven P. Stroobants

Name: STEVEN P. STROOBANTS

Its: SECRETARY

AUTHENTICATION

Signature(s) _____

authenticated on _____

*_____

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

NOTARY PUBLIC STUART RUDDY STATE OF WISCONSIN

THIS INSTRUMENT DRAFTED BY:

'uart Ruddy
.odfrey & Kahn, S,.C.

ACKNOWLEDGMENT

STATE OF WISCONSIN)
) ss.
Milwaukee COUNTY)

Personally came before me this 27th day of July, 2006, the the above-named Steve Stroobants, the Secretary of American Finishing Resources, Inc., to me known to be the person(s) who executed the foregoing instrument and acknowledged the same.

Stuart Ruddy

*Stuart Ruddy
Notary Public, State of Wisconsin
My Commission (is permanent) (~~expires:~~ _____)

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

© 2003 STATE BAR OF WISCONSIN

* Type name below signatures.

EXHIBIT A

PARCEL 1

Lot One (1) of CERTIFIED SURVEY MAPS No. 953, recorded February 24, 1983 at 1:05 P.M. in Vol. 6 of Survey Maps on page 390 as Document No. 167346, being part of Government Lots 8 and 2, Section 18, T18N, R20E, City of Chilton, Calumet County, Wisconsin.

EXCEPTING therefrom that portion dedicated for Public Street as shown on the survey map.

PARCEL 2

Lot One (1) of CERTIFIED SURVEY MAP NO. 1051, recorded May 8, 1984, at 3:17 P.M. in Vol. 7 of CSM, page 224-226, as Doc. #172949, being part of Government Lot 2, Section 18, T18N, R20E, City of Chilton, Calumet County, Wisconsin.

PARCEL 3

All that part of Government Lot 2 of Section 18, Town 18 North, Range 20 East, City of Chilton, Calumet County, Wisconsin, which is more fully described as follows:

Beginning at the Northeast corner of Certified Survey Map No. 1051 which is recorded in Vol. 7, Page 224, thence South 63 degrees 25 minutes 09 seconds East along the south right-of-way line of C.M.ST. P&P. Railroad, 213.20 feet, thence South 01 degrees 13 minutes 10 seconds East parallel with the east line of CSM No. 1051, 238.67 feet to a point on the north line of Clay Street, thence North 59 degrees 53 minutes 00 seconds West along said North line 220.79 feet to a point on the east line of CSM No. 1051, thence North 01 degrees 13 minutes 10 seconds West along said East line, 223.28 feet to the point of beginning.

PARCEL 4

A part of Government Lot 2, Section Eighteen (18), Township Eighteen (18) North, Range Twenty (20) East, City of Chilton, Calumet County, Wisconsin, and being described as:

Commencing at the East Quarter Corner of said Section 18; thence S. 00° 04' 16" E. 256.09 feet along the East line of the Southeast Quarter (SE 1/4) of said Section 18 to the Southerly line of the Wisconsin Central Railroad Right-Of-Way; thence N. 63° 25' 09" W. 1410.01 feet along the said Southerly line to the true point of beginning; thence S. 26° 34' 51" W. 215.35 feet to the Northerly line of Clay Street; thence N. 63° 25' 09" W. 330.85 feet along said Northerly line; thence 59° 59' 10" W. 69.86 feet along said Northerly line to the East line of those lands described in Jacket 1054, Image 1 of Calumet County Records; thence N. 01° 13' 10" W. 238.67 feet along said East line to the said Southerly line of the Wisconsin Central Railroad Right-Of-Way; thence S. 63° 25'-09" E. 511.90 feet along said Southerly line to the true point of beginning.

Tax Key No. 211-0000-0000000-000-0-182018-05-020C (Loc ID 16946)

EXHIBIT B

Wisconsin Permitted Encumbrances

1. Real Estate Taxes for 2006 and subsequent years.

2. Utility Easement granted by Leo B. Vogt and Bernadette J. Vogt, his wife to City of Chilton, a Wisconsin Municipality, by an instrument dated November 5, 1974 and recorded in the office of the Register of Deeds for Calumet County, Wisconsin on December 31, 1974 in Volume 140 of Records on Page 829, as Document No. 134896. (Affects Parcels 2-4).

3. Drainage And Storm Sewer Easement granted by Leo B. Vogt and Bernadette J. Vogt, his wife to City of Chilton, a Wisconsin Municipality, by an instrument dated July 31, 1980 and recorded in the office of the Register of Deeds for Calumet County, Wisconsin on July 31, 1980 in Volume 181 of Records on Page 636, as Document No. 157200 and amended by Drainage And Storm Sewer Easement, dated October 2, 1980 and recorded in said Register's office on October 17, 1980 in Volume 183 of Records on Page 491, as Document No. 158176 and amended by Amended Drainage And Storm Sewer Easement, dated June 7, 1983 and recorded in said Register's office on June 15, 1983 in Jacket 341, Image 15-18, as Document No. 168768. (Affects Parcel 1).

4. Utility Easement by and between Kaytee Products Incorporated, a Wisconsin Corporation, Thermal Clean, Inc., a Wisconsin Corporation and the City of Chilton, a Wisconsin Municipality dated April 19, 1991 and recorded in the office of the Register of Deeds for Calumet County, Wisconsin on June 18, 1991 in Jacket 1688, Image 14-16, as Document No. 213022. (Affects Parcel 1).

5. Reservation Of Easement, granted by The City of Chilton, a Wisconsin Municipality, by an instrument dated September 17, 1991 and recorded in the office of the Register of Deeds for Calumet County, Wisconsin on October 2, 1991 in Jacket 1754, Image 15, as Document No. 214979. (Affects Parcel 4).

6. Grant Of Easement, granted by Kaytee Products Incorporated to City of Chilton by an instrument dated September 30, 1991 and recorded in the office of the Register of Deeds for Calumet County, Wisconsin on October 1, 1991 in Jacket 1751, Image 48, as Document No. 214922. (Affects Parcel 4).

7. Reservation for easement contained in Warranty Deed from City of Chilton, a Wisconsin Municipality to Stroobants and Associates, a Wisconsin partnership, consisting of Keith G. Stroobants and Steven P. Stroobants, general partners, dated December 17, 1991 and recorded in the office of the Register of Deeds for Calumet County, Wisconsin on January 7, 1992 in Jacket 1819, Image 1-2, as Document No. 216685. (Affects Parcel 4).

8. 40' storm sewer easement as designated on Certified Survey Map No. 953 recorded in the office of the Register of Deeds for Calumet County, Wisconsin on February 24, 1983 in Volume 6 of Survey Maps on Page 390, as Document No. 167346. (Affects Parcel 1).

9. Apparent easement for buried electric and electronic transformer pad, as disclosed on Survey prepared by Anthony P. Lulloff of Aero-Metric, Incorporated, dated 07-06-06. (Affects Parcel 1).

mw1179105_1

Delaware

The First State

I, HARRIET SMITH WINDSOR, SECRETARY OF STATE OF THE STATE OF DELAWARE, DO HEREBY CERTIFY THE ATTACHED IS A TRUE AND CORRECT COPY OF THE CERTIFICATE OF AMENDMENT OF "BGS ACQUISITION, LLC", CHANGING ITS NAME FROM "BGS ACQUISITION, LLC" TO "AMERICAN FINISHING RESOURCES, LLC", FILED IN THIS OFFICE ON THE FIRST DAY OF AUGUST, A.D. 2006, AT 6:34 O'CLOCK P.M.

Harriet Smith Windsor

Harriet Smith Windsor, Secretary of State

4181773 8100

060722926

AUTHENTICATION: 4944208

DATE: 08-01-06

State of Delaware
Secretary of State
Division of Corporations
Delivered 06:34 PM 08/01/2006
FILED 06:34 PM 08/01/2006
SRV 060722926 - 4181773 FILE

CERTIFICATE OF AMENDMENT TO THE CERTIFICATE OF FORMATION OF BGS ACQUISITION, LLC

1. The name of the limited liability company is BGS Acquisition, LLC.

2. RESOLVED, that Article I of the Certificate of Formation is hereby amended to read in its entirety as follows:

Article I. Name of the limited liability company:

American Finishing Resources, LLC

Executed on behalf of the Company on August 1, 2006.

BGS ACQUISITION, LLC

By: David J. Raffel
(signature)

David J. Raffel
(print name)

Secretary
(title)

This document was drafted by Lisa M. O'Donnell, Esq.

Return to:

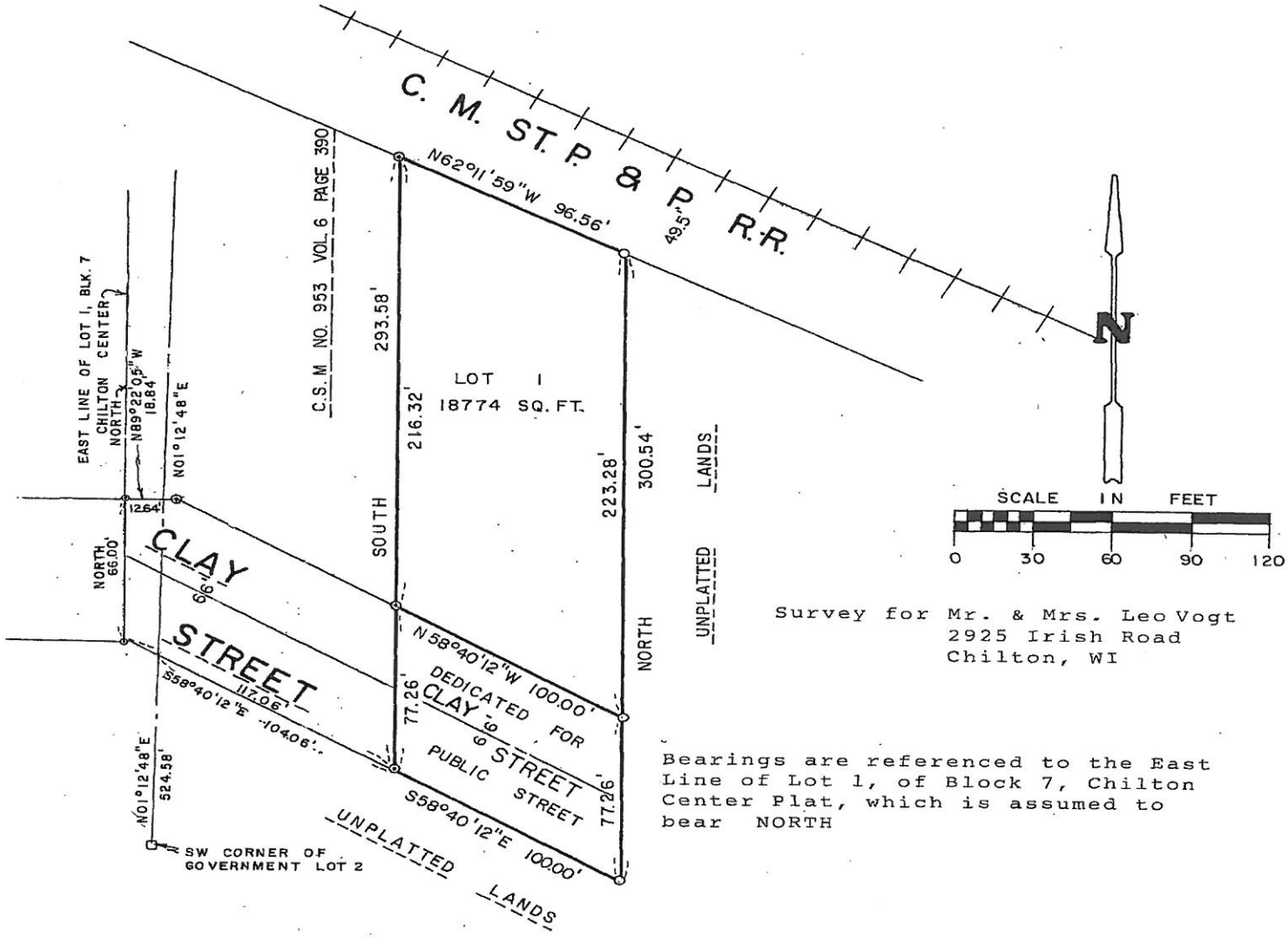
Linda Eisert, Paralegal
Reinhart Boerner Van Deuren s.c.
1000 North Water Street
Suite 2100
Milwaukee, WI 53202
414-298-8399

MWU336990

Attachment G.2 - Certified Survey Map

CERTIFIED SURVEY MAP NO. 1051

Part of Government Lot 2, Section 18, Township 18 North, Range 20 East, City of Chilton, Calumet County, Wisconsin.



Survey for Mr. & Mrs. Leo Vogt
2925 Irish Road
Chilton, WI

Bearings are referenced to the East Line of Lot 1, of Block 7, Chilton Center Plat, which is assumed to bear NORTH

LEGEND

- 1" IRON PIPE SET, 24" LONG, WEIGHING 1.13 LBS PER LIN. FOOT
- 1-1/4" STEEL REINFORCING BAR SET, 30" LONG, WEIGHING 4.303 LBS. PER LIN. FOOT
- SECTION MONUMENT
- PK NAIL
- 1" IRON PIPE FOUND
- 2" IRON PIPE FOUND
- 3/4" REBAR FOUND
- 1-1/4" REBAR FOUND
- FENCE
- CHISELED "x"
- RAILROAD SPIKE
- ( ) RECORDED AS

WISCONSIN DAVID D. EISELE S-974 MENASHA, WIS. LAND SURVEYOR

April 6, 1984

THIS INSTRUMENT WAS DRAFTED BY:

Martenson & Eisele, Inc.
CONSULTING ENGINEERING & LAND SURVEYING
1919 AMERICAN COURT
NEENAH WIS. 54956
PHONE - 731-0381

FIELD BOOK ____ PAGE ____ PROJECT NO. 249-13 SHEET 1 OF 3

CERTIFIED SURVEY MAP NO. 1051

Surveyor's Certificate:

I, David D. Eisele, Land Surveyor, hereby certify that I have surveyed and mapped for Mr. Leo Vogt, part of Government Lot 2, Section 18, Township 18 North, Range 20 East, City of Chilton, Calumet County, Wisconsin, more fully described as follows:

Commencing at the Southwest corner of Government Lot 2, said Section 18; thence N 01°-12'-48"-E, along the west line of said Government Lot 2, 524.58 feet to the Southerly line of Clay Street; thence S 58°-40'-12" E, along the Southerly line of Clay Street, 104.06 feet; to the point of beginning; thence continuing S 58°-40"-12" E, 100.00 feet; thence North, 300.54 feet to a point on the Southerly line of the Chicago, Milwaukee, Saint Paul and Pacific Railroad; thence N 62°-11'-59" W, along the Southerly line of said railroad, 96.56 feet to Northeast corner of Lot 1 of Certified Survey Map No. 953; thence South, along the east line of said Lot 1, 293.58 feet to the point of beginning. Parcel is subject to all easements and restrictions of record.

and that I have fully complied with Chapter 236.34 of the Wisconsin Statutes in surveying, dividing, and mapping the same, and with the City of Chilton Subdivision Ordinance.

Given under my hand this 6 day of April, 1984.

David D. Eisele

David D. Eisele, Reg. Wis. Land Surveyor S-974

WISCONSIN DAVID D. EISELE S-974 MENASHA, WIS. LAND SURVEYOR

Certificate of Owners:

As owners we, the undersigned, hereby certify that we caused the land above described to be surveyed, divided, dedicated, and mapped all as shown on this map.
Date: 10 day of April, 1984.

Leo B. Vogt — Leo B. Vogt

Bernadette J. Vogt — Bernadette J. Vogt

State of Wisconsin)
)SS
Calumet County)

Personally came before me on the 10 day of April, 1984, the above named owners to me known to be the persons who executed the foregoing instrument and acknowledge the same.

Dale D. Klinghuf
Notary Public-Calumet County, WI

My Commission Expires Oct 18, 1987

Approvals

Approved by the City Council of the City of Chilton, Calumet County, Wisconsin, this 17 day of ~~May~~ April 17, 1984.

A W Larson — Mayor

Arthur T. Pohlman — City Clerk

Approved by the City of Chilton Planning Commission this 11th day of April 1984.

A W Larson
Planning Commission Chairman

PROJECT NO. 249-13
SHEET 2 OF 3

CERTIFIED SURVEY MAP NO. 1051

Treasurer's Certificate

I hereby certify that there are no unpaid taxes or unpaid special assessments on any of the lands shown hereon.

[signature]	Nancy Meyer
City Treasurer	County Treasurer
April 10, 1984	April 9, 1984
Date	Date

WISCONSIN
DAVID D. EISELE
8974
MENASHA, WIS.
LAND SURVEYOR

April 6, 1984

PROJECT NO 249-13
SHEET 3 OF 3

I CERTIFY THAT THIS DOCUMENT WAS MICROFILMED ACCORDING TO WI STATUTE 16.61(7). TAMI ALTEN, CALUMET COUNTY MICROFILM OPERATOR.

25X 32X

172949

CERTIFIED SURVEY MAP #1051

REGISTERS OFFICE
CALUMET COUNTY, WI
Received for Record 8
day of May A.D. 19 84
3:17 o'clock P.M. and Recorded in
Vol. 7 Survey Maps 224

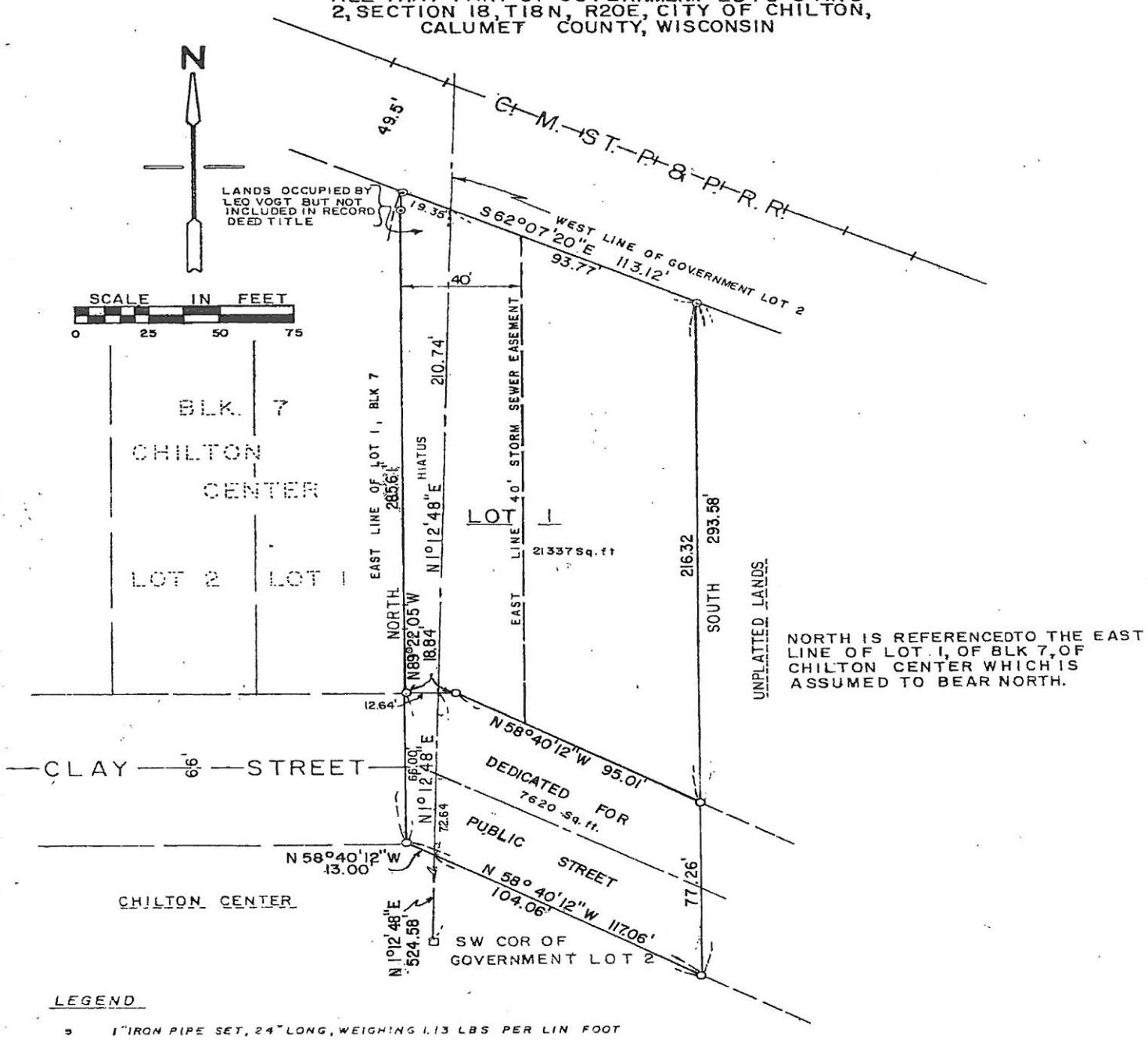
Register

I CERTIFY THAT THIS DOCUMENT WAS MICROFILMED ACCORDING TO WI STATUTE 16.61(7). TAMI ALTEN, CALUMET COUNTY MICROFILM OPERATOR.

25× 32×

CERTIFIED SURVEY MAP NO. 953

ALL THAT PART OF GOVERNMENT LOTS 8 AND 2, SECTION 18, T18N, R20E, CITY OF CHILTON, CALUMET COUNTY, WISCONSIN



LEGEND

- 1" IRON PIPE SET, 24" LONG, WEIGHING 1.13 LBS PER LIN FOOT
- 1-1/4" STEEL REINFORCING BAR SET, 30" LONG, WEIGHING 4.303 LBS PER LIN. FOOT
- SECTION MONUMENT
- PK NAIL
- 1" IRON PIPE FOUND
- 2" IRON PIPE FOUND
- 3/4" REBAR FOUND
- 1-1/4" REBAR FOUND
- FENCE
- CHISELED "X"
- RAILROAD SPIKE

WISCONSIN DAVID D. EISELE S-974 MENASHA, WIS. LAND SURVEYOR

Feb. 8, 1983

THIS INSTRUMENT WAS DRAFTED BY: D. B.

Martenson & Eisele, Inc.
CONSULTING ENGINEERING & LAND SURVEYING
1919 AMERICAN COURT
NEENAH, WIS. 54956
PHONE - 731-0331

PROJECT NO. 249-6
SHEET 1 of 3

CERTIFIED SURVEY MAP NO. 953

SURVEYOR'S CERTIFICATE:

I, David D. Eisele, Land Surveyor, do hereby certify that I have surveyed all that part of the Government lots 8 and 2 in Section 18, Township 18 North, Range 20 East, City of Chilton, Calumet County, Wisconsin, more fully described as follows:

Commencing at the Southwest corner of Government lot 2; thence N 1°-12'-48" E along the West line of said government lot 524.58 feet to the point of beginning; thence N 58°-40'-12" W, 13.00 feet to the Northeast corner of lot 12, Block 6, Chilton Center Plat; thence North along the East line of lot 1 of Block 7, 285.61 feet to a point on the South line of the Chicago, Milwaukee, St. Paul, and Pacific Railroad Company right-of-way; thence S 62°-07'-20" E along the said South line 113.12 feet; thence South 293.58 feet; thence N 58°-40'-12" W, 104.06 feet to the point of beginning, subject to all easements and restrictions of record, and that I have fully complied with Chapter 236.34 of the Wisconsin Statutes in surveying, dividing and mapping the same, and with the City of Chilton Land Subdivision Ordinance.

Given this 8th day of February, 1983.

David D. Eisele

David D. Eisele, Reg. No. S-974

WISCONSIN
DAVID D. EISELE
S-974
MENASHA, WIS.
LAND SURVEYOR

CERTIFICATE OF OWNERS

As owners we, the undersigned, hereby certify that we caused the land above described to be surveyed, divided,* and mapped all as shown on this map.
Date: 9 day of Feb., 1983.
*dedicated

Leo B. Voigt
Owner

Leo B. Voigt
Owner

Owner

Owner

State of Wisconsin)
)SS
Caulumet County)

Personally came before me on the 9th day of February, 1983, the above named owners to me known to be the persons who executed the foregoing instrument and acknowledge the same.

Thomas H. Haecking
Notary Public - Calumet County

My Commission Expires Dec 15, 1985

APPROVALS

Approved by the City Council of the City of Chilton, Calumet County, Wisconsin, this 15th day of February, 1983.

A W Larson
Mayor

Arthur T. Pohland
City Clerk

Approved by the City of Chilton Planning Commission this 9th day of Feb., 1983

A W Larson
Planning Commission Chairman

Martenson & Eisele, Inc.
CONSULTING ENGINEERING & LAND SURVEYING
1919 AMERICAN COURT
NEENAH WIS. 54956
PHONE - 731-0381

167346

CERTIFIED SURVEY MAP #953

REGISTERS OFFICE
CALUMET COUNTY, WI
Received for Record 24
Day of February A.D., 19 83
1:05 o'clock P. M. and Recorded in
Vol. 6 Survey Page 390
Maps

I CERTIFY THAT THIS DOCUMENT WAS MICROFILMED ACCORDING TO WI STATUTE 16.61(7). TAMI ALTEN, CALUMET COUNTY MICROFILM OPERATOR.

25×

32×

Attachment G.3 - Verification of Zoning

Calumet County
Tax Billing and Real Estate Assessment Information

Physical Location: 476 CLAY ST	**Tax ID:** 16946	**Location ID:** 16946	**Previous ID:** 2110418182013C	**Location:** Sec. 18, T18N, R20E
Tax Parcel Identification Number: 211-0000-0000000-000-0-182018-05-020C	**Tax District:** 211 - CITY OF CHILTON			**School District:** CHIL SCHOOL
Owner: BGS ACQUISITION LLC	**Mailing Address:** C/O AMER FIN RESOURCES LLC CHILTON, WI 53014			**Fire District:** CHILTON FIRE DISTRICT
Tax Parcel Description and Comments: J1054-1,J2210-20,J4495-49 GL2 SEC.18-18-20 CSM#953 VOL.6-390 & CSM#1051 VOL.7-224 & COM NE/C CSM#1051, SELY725.1',SW215.35',TO N/L CLAY ST,NWLY621.5'ALG N/L ST, N223.28'TO POB	**Document Number:** **Doc. #:** 407971 **Last Doc. Date:** 08/03/2006 **Transfer Fee:** $3,115.50			**Sanitary District:** CHILTON LAKE DIST

REAL ESTATE ASSESSMENT

General Property Taxes

Assessment Class	Acres	Land Value	Improvements	
MANUFACTURING L		$52,700		
MANUFACTURING I			$1,151,400	
Total		$52,700	$1,151,400	**$1,204,100**
Estimated Fair Market Value:				$1,118,655

On-Line Mapping
Payment History

TAX INFORMATION

Tax Year..: 2013 Go

Taxes	
STATE TAX-211	$191.62
CHIL LK DIST	$84.67
CAL CO TAX-211	$6,121.68
CHIL SCHL-211	$10,898.00
FVTC-1200-211	$2,228.27
CTY CHIL TAX	$6,654.48
Charges	
Gross Total Tax:	$26,178.72
Credits	
FIR CRED-CHILT	$72.10
NET TAX DUE 2013:	$26,106.62
NET TAX PAID 2013:	$13,053.32
Date of Last Payment:	1/27/2014
Current	
ACCOUNT BALANCE:	$13,053.30
Interest:	$.00
Penalty:	$.00
TOTAL ACCOUNT BALANCE:	$13,053.30
Data Current As Of:	4/24/2014

Calumet County Home Tax/Land Inquiry Disclaimer Webmaster

NSCLND003K

Attachment G.4 - Signed Statement

STATEMENT

I believe the legal description provided below accurately describes the correct contaminated property.

Signature

Mr. Matt Kirchner

Printed Name

American Finishing Resources, CEO

Company and Position

PARCEL 1

Lot One (1) of Certified Survey Mays No. 953, recorded February 24, 1983 at 1:05 PM in Vol 6 of Survey maps on Page 390 as Document No. 167346, being part of Government Lots 8 and 2, Section 18, T18N, R20E, City of Chilton, Calumet County, Wisconsin, Excepting therefrom that portion dedicated for Public Street as shown on the Survey Map.

PARCEL 2

Lot One (1) of Certified Survey Mays No. 1051, recorded May 8, 1984 at 3:17 PM in Vol 7 of Survey maps page 224-226 as Doc # 172949, being part of Government Lot 2, Section 18, T18N, R20E, City of Chilton, Calumet County, Wisconsin

PARCEL 3

All of part of Government Lot 2 of Section 18, T18N, R20E, City of Chilton, Calumet County, Wisconsin, which is more fully described as follows:

Beginning at the northeast corner of CSM # 1051, thence South 63 degrees 25 minutes 09 seconds East along the south right-of-way line of C.M.ST.P & P. Railroad, 213.20 feet, thence south 01 degrees 13 minutes 10 seconds East parallel with the east line of SCM No. 1051, 238.67 feet to a point on the north line of Clay Street, thence North 59 degrees 53 minutes 00 seconds West along said North line 220.79 feet to a point on the east line of CSM No. 1051, thence North 01 degrees 13 minutes 10 seconds West along said East line, 223.28 feet to the point of beginning.

PARCEL 4

A part of Government Lot 2 of Section 18, T18N, R20E, City of Chilton, Calumet County, Wisconsin, and being described as:

Commencing at the East Quarter Corner of said Section 18; thence S. 00 degrees 4 minutes 16 seconds E. 256.09 feet along the East line of the SE quarter of said Section 18 to the Southerly line of the Wisconsin Central Railroad Right of Way; thence N 63 degrees 25 minutes 9 seconds W. 1410.01 feet along the said Southerly line to the true point of beginning; thence S. 26 degrees 34 minutes 51 seconds W 215.35 feet to the Northerly line of Clay Street; thence N. 63 degrees 25 minutes 9 seconds W 330.85 feet along said Northerly line; thence 59 degrees 59 minutes 10 seconds W. 69.86 feet along said Northerly line to the East line of those lands described in Jacket 1054, Image 1 of Calumet County Records; thence N. 01 degree 13 minutes 10 seconds W. 238.67 feet along said East line to the said Southerly line of the Wisconsin Central Railroad Right of Way; thence S. 63 degrees 25 minutes 9 seconds E. 511.90 feet along said Southerly line to the true point of beginning.