

REVISED

1:31 pm, Oct 14, 2010

**GIS REGISTRY
Cover Sheet**

POST
CLOSURE

March, 2010
(RR 5367)

Source Property Information

BRRTS #: 02-15-184378

ACTIVITY NAME: Sturgeon Bay Bulk Plt

PROPERTY ADDRESS: 628 S Oxford Ave

MUNICIPALITY: Sturgeon Bay

PARCEL ID #: 2816476000816

CLOSURE DATE: Sep 20, 2002

FID #: 415002060

DATCP #:

COMM #: 54235194228

***WTM COORDINATES:**

X: 727228 **Y:** 486555

** 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)

Contaminated Media:

Groundwater Contamination > ES (236)

Contamination in ROW

Off-Source Contamination

*(note: for list of off-source properties
see "Impacted Off-Source Property" form)*

Soil Contamination > *RCL or **SSRCL (232)

Contamination in ROW

Off-Source Contamination

*(note: for list of off-source properties
see "Impacted Off-Source Property" form)*

Land Use Controls:

N/A (Not Applicable)

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)

*(note: maintenance plan for
groundwater or direct contact)*

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*

This Adobe Fillable form is intended to provide a list of information that is required for evaluation for case closure. It is to be used in conjunction with Form 4400-202, Case Closure Request. The closure of a case means that the Department has determined that no further response is required at that time based on the information that has been submitted to the Department.

NOTICE: Completion of this form is mandatory for applications for case closure pursuant to ch. 292, Wis. Stats. and ch. NR 726, Wis. Adm. Code, including cases closed under ch. NR 746 and ch. NR 726. The Department will not consider, or act upon your application, unless all applicable sections are completed on this form and the closure fee and any other applicable fees, required under ch. NR 749, Wis. Adm. Code, Table 1 are included. It is not the Department's intention to use any personally identifiable information from this form for any purpose other than reviewing closure requests and determining the need for additional response action. The Department may provide this information to requesters as required by Wisconsin's Open Records law [ss. 19.31 - 19.39, Wis. Stats.].

BRRTS #: PARCEL ID #:
ACTIVITY NAME: WTM COORDINATES: X: Y:

CLOSURE DOCUMENTS (the Department adds these items to the final GIS packet for posting on the Registry)

- Closure Letter**
- Maintenance Plan** (if activity is closed with a land use limitation or condition (land use control) under s. 292.12, Wis. Stats.)
- Continuing Obligation Cover Letter** (for property owners affected by residual contamination and/or continuing obligations)
- Conditional Closure Letter**
- Certificate of Completion (COC)** (for VPLE sites)

SOURCE LEGAL DOCUMENTS

- Deed:** The most recent deed as well as legal descriptions, for the **Source Property** (where the contamination originated). Deeds for other, off-source (off-site) properties are located in the **Notification** section.
Note: If a property has been purchased with a land contract and the purchaser has not yet received a deed, a copy of the land contract which includes the legal description shall be submitted instead of the most recent deed. If the property has been inherited, written documentation of the property transfer should be submitted along with the most recent deed.
- Certified Survey Map:** A copy of the certified survey map or the relevant section of the recorded plat map for those properties where the legal description in the most recent deed refers to a certified survey map or a recorded plat map. (lots on subdivided or platted property (e.g. lot 2 of xyz subdivision)).
Figure #: **Title:**
- Signed Statement:** A statement signed by the Responsible Party (RP), which states that he or she believes that the attached legal description accurately describes the correct contaminated property.

MAPS (meeting the visual aid requirements of s. NR 716.15(2)(h))

Maps must be no larger than 11 x 17 inches unless the map is submitted electronically.

- 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 parcels. If groundwater standards are exceeded, include the location of all potable wells within 1200 feet of the site.
Note: Due to security reasons municipal wells are not identified on GIS Packet maps. However, the locations of these municipal wells must be identified on Case Closure Request maps.
Figure #: 1 **Title: Site Location & Local Topography**
- Detailed Site Map:** A map that shows all relevant features (buildings, roads, individual property boundaries, 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) or a Site Specific Residual Contaminant Levels (SSRCL) as determined under s. NR 720.09, 720.11 and 720.19.
Figure #: 4 **Title: Monitoring Well Locations**
- Soil Contamination Contour Map:** For sites closing with residual soil contamination, this map is to show the location of all 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) or a Site Specific Residual Contaminant Level (SSRCL) as determined under s. NR 720.09, 720.11 and 720.19.
Figure #: **Title:**

BRRTS #: 02-15-184378

ACTIVITY NAME: Sturgeon Bay Bulk Plant

MAPS (continued)

Geologic Cross-Section Map: A map showing the source location and vertical extent of residual soil contamination exceeding a Residual Contaminant Level (RCL) or a Site Specific Residual Contaminant Level (SSRCL). If groundwater contamination exceeds a ch. NR 140 Enforcement Standard (ES) when closure is requested, show the source location and vertical extent, water table and piezometric elevations, and locations and elevations of geologic units, bedrock and confining units, if any.

Figure #: **Title:**

Figure #: **Title:**

Groundwater Isoconcentration Map: For sites closing with residual groundwater contamination, this map shows the horizontal extent of all groundwater contamination exceeding a ch. NR140 Preventive Action Limit (PAL) and an Enforcement Standard (ES). Indicate the direction and date of groundwater flow, based on the most recent sampling data.

Note: This is intended to show the total area of contaminated groundwater.

Figure #: 4 **Title: Monitoring Well Locations**

Groundwater Flow Direction Map: A map that represents groundwater movement at the site. If the flow direction varies by more than 20° over the history of the site, submit 2 groundwater flow maps showing the maximum variation in flow direction.

Figure #: **Title:**

Figure #: **Title:**

TABLES (meeting the requirements of s. NR 716.15(2)(h)(3))

Tables must be no larger than 11 x 17 inches unless the table is submitted electronically. Tables must not contain shading and/or cross-hatching. The use of **BOLD** or *ITALICS* is acceptable.

Soil Analytical Table: A table showing remaining soil contamination with analytical results and collection dates.

Note: This is one table of results for the contaminants of concern. Contaminants of concern are those that were found during the site investigation, that remain after remediation. It may be necessary to create a new table to meet this requirement.

Table #: **Title:**

Groundwater Analytical Table: Table(s) that show the most recent analytical results and collection dates, for all monitoring wells and any potable wells for which samples have been collected.

Table #: NA, NA, 4 **Title: GW PAH Data Sum Table, GW Analytical Results Sum, GW Analytical Results**

Water Level Elevations: Table(s) that show the previous four (at minimum) water level elevation measurements/dates from all monitoring wells. If present, free product is to be noted on the table.

Table #: **Title:**

IMPROPERLY ABANDONED MONITORING WELLS

For each monitoring well not properly abandoned according to requirements of s. NR 141.25 include the following documents.

Note: If the site is being listed on the GIS Registry for only an improperly abandoned monitoring well you will only need to submit the documents in this section for the GIS Registry Packet.

Not Applicable

Site Location Map: A map showing all surveyed monitoring wells with specific identification of the monitoring wells which have not been properly abandoned.

Note: If the applicable monitoring wells are distinctly identified on the Detailed Site Map this Site Location Map is not needed.

Figure #: **Title:**

Well Construction Report: Form 4440-113A for the applicable monitoring wells.

Deed: The most recent deed as well as legal descriptions for each property where a monitoring well was not properly abandoned.

Notification Letter: Copy of the notification letter to the affected property owner(s).

BRRTS #: 02-15-184378

ACTIVITY NAME: Sturgeon Bay Bulk Plant

NOTIFICATIONS

Source Property

Not Applicable

Letter To Current Source Property Owner: If the source property is owned by someone other than the person who is applying for case closure, include a copy of the letter notifying the current owner of the source property that case closure has been requested.

Return Receipt/Signature Confirmation: Written proof of date on which confirmation was received for notifying current source property owner.

Off-Source Property

Group the following information per individual property and label each group according to alphabetic listing on the "Impacted Off-Source Property" attachment.

Not Applicable

Letter To "Off-Source" Property Owners: Copies of all letters sent by the Responsible Party (RP) to owners of properties with groundwater exceeding an Enforcement Standard (ES), and to owners of properties that will be affected by a land use control under s. 292.12, Wis. Stats.

Note: Letters sent to off-source properties regarding residual contamination must contain standard provisions in Appendix A of ch. NR 726.

Number of "Off-Source" Letters:

Return Receipt/Signature Confirmation: Written proof of date on which confirmation was received for notifying any off-source property owner.

Deed of "Off-Source" Property: The most recent deed(s) as well as legal descriptions, for all affected deeded **off-source property(ies)**. This does not apply to right-of-ways.

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.

Letter To "Governmental Unit/Right-Of-Way" Owners: Copies of all letters sent by the Responsible Party (RP) to a city, village, municipality, state agency or any other entity responsible for maintenance of a public street, highway, or railroad right-of-way, within or partially within the contaminated area, for contamination exceeding a groundwater Enforcement Standard (ES) and/or soil exceeding a Residual Contaminant Level (RCL) or a Site Specific Residual Contaminant Level (SSRCL).

Number of "Governmental Unit/Right-Of-Way Owner" Letters:



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Jim Doyle, Governor
Matthew J. Frank, Secretary
Ronald W. Kazmierczak, Regional Director

Northeast Region Headquarters
2984 Shawano Ave.
Green Bay, Wisconsin 54313-6727
Telephone 920-662-5100
FAX 920-662-5413
TTY Access via relay - 711

October 4, 2010

POST
CLOSURE

Hunt & Associates
Attn: Mr. David Hunt
7521 Eliason Road
Sturgeon Bay, WI 54235

SUBJECT: Groundwater Analytical Results and GIS Registry Listing
Sturgeon Bay Bulk Plant, 628 South Oxford Avenue, Sturgeon Bay, Wisconsin
WDNR BRRTS # 02-15-184378

Dear Mr. Hunt:

This letter serves as a courtesy to inform you of recently reported groundwater contamination on your property known as the Sturgeon Bay Bulk Plant located at 628 South Oxford Avenue, Sturgeon Bay, Wisconsin. The Department of Natural Resources (Department) attempted to contact you by phone on September 28, 2010, in an effort to provide you with recent groundwater analytical data obtained from groundwater monitoring well MW14 which is located on the Sturgeon Bay Bulk Plant property. The Department believes the confirmed groundwater contamination in MW14 is related to the historic release from the petroleum bulk tanks formerly located on your property. For your convenience, a site map and data tables are attached to this letter.

On September 20, 2002, the Department issued a final case closure letter to Quality State Oil, the former property owner, for the Sturgeon Bay Bulk Plant. Within this letter, the Department stated it considered the Sturgeon Bay Bulk Plant site closed and no further investigation, remediation or other action was required. The Department still considers the Sturgeon Bay Bulk Plant site to be closed but wanted to make you aware of groundwater contaminant concentrations (in groundwater monitoring well MW14) above the ch. NR 140, Wis. Adm. Code, enforcement standard of 0.2 parts per billion for Chrysene (commonly present after a release of heavier petroleum products such as diesel fuel). This groundwater analytical data was obtained during the site investigation/remediation activities being conducted under the adjacent Sturgeon Bay Utilities (WDNR BRRTS # 03-15-114878) leaking underground storage tank site.

GIS Registry

Based on the most recent groundwater analytical data, the Sturgeon Bay Bulk Plant site may be listed on the Remediation and Redevelopment Program's GIS Registry. The specific reason is summarized below:

- Groundwater contamination is present above a Chapter NR 140 enforcement standard.

This letter and information that was submitted with the Sturgeon Bay Bulk Plant and Sturgeon Bay Utilities closure request applications may be included on the GIS Registry. To review the sites on the GIS Registry web page, visit the RR Sites Map page at <http://dnr.wi.gov/org/aw/rr/gis/index.htm>. The

POST
CLOSURE

Sturgeon Bay Bulk Plant may be listed on the GIS Registry because of remaining contamination. If you intend to construct or reconstruct a well on the property, you will need prior Department approval in accordance with s. NR 812.09(4)(w), Wis. Adm. Code. To obtain approval, Form 3300-254 needs to be completed and submitted to the DNR Drinking and Groundwater program's regional water supply specialist. This form can be obtained on-line <http://dnr.wi.gov/org/water/dwg/3300254.pdf> or at the web address listed above for the GIS Registry.

The Department has copied an adjacent property owner, DDT Investments LLC, on this letter as they should consider obtaining prior Department approval before constructing or reconstructing a well on their property located at 267 Nautical Drive, Sturgeon Bay, Wisconsin. While recent groundwater analytical data was not obtained from the DDT Investments LLC property, the Department suspects impacted groundwater may exist on their property as well.

Residual Groundwater Contamination

Groundwater impacted by Chrysene contamination greater than enforcement standards set forth in ch. NR140, Wis. Adm. Code, is present on the Sturgeon Bay Bulk Plant property. For more detailed information regarding the locations where groundwater samples have been collected (i.e. monitoring well locations) and the associated contaminant concentrations, refer to the attachments or the Remediation and Redevelopment Program's GIS Registry at the RR Sites Map page at <http://dnr.wi.gov/org/aw/rr/gis/index.htm>.

Vapor Migration

Depending on site-specific conditions, construction over contaminated materials 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.

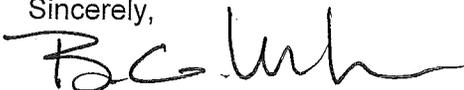
Dewatering Permits

The Department's Watershed Management 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.

Based on the concentrations of contaminants remaining in groundwater at this location, it appears likely that dewatering activities would require a permit from the Watershed Management Program. 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://www.dnr.state.wi.us/org/water/wm/ww/>

If you have any questions or concerns regarding the content of this letter, please contact Kristin Dufresne in Green Bay at 920-662-5543.

Sincerely,

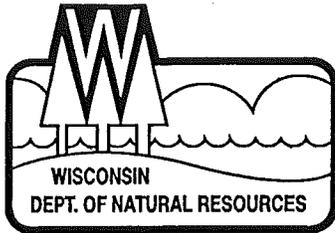


Bruce G. Urben
Northeast Region Air & Waste Leader
Bureau for Remediation & Redevelopment

Attachments

POST
CLOSURE

cc: DDT Investments LLC
P.O. Box 227, Sturgeon Bay, WI 54235
Laurie Bauldry, Sturgeon Bay Utilities
230 East Vine Street, Sturgeon Bay, WI 54235
Jason Powell, METCO
1421 S 16th Street, LaCrosse, WI 54603



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Scott McCallum, Governor
Darrell Bazzell, Secretary
Ronald W. Kazmierczak, Regional Director

Peshtigo Service Center
PO Box 208
101 N. Ogden Road
Peshtigo, Wisconsin 54157
Telephone 715-582-5048
FAX 715-582-5005

September 20, 2002

BERNARD NOWICKI
QUALITY STATE OIL CO
2201 CALUMENT DR
PO BOX 848
SHEBOYGAN WI 53082-0848

SUBJECT: FINAL CASE CLOSURE BY CLOSURE COMMITTEE
WITH CONDITIONS MET
Sturgeon Bay Bulk Plant
628 S. Oxford Street, Sturgeon Bay, WI
WDNR BRRTS # 02-15-184378

Dear Mr. Nowicki:

On July 15, 2002, your site as described above was reviewed for closure by the Northeast Region Closure Committee. This committee reviews environmental remediation cases for compliance with state laws and standards to maintain consistency in the closure of these cases. On July 18, 2002, you were notified that the Closure Committee had granted conditional closure to this case. The Department sent an amended conditional closure letter to you on July 31, 2002.

On September 19, 2002, the Department received correspondence indicating that you have complied with the conditions of closure. On this date, the Department received copies of monitoring well abandonment forms from your consultant. The report also indicated that all investigative waste generated at the site had been disposed of. Based on the correspondence and data provided, it appears that your case meets the screening criteria of s. NR 746.07 or s. NR 746.08, Wis. Adm. Code, and the requirements of ch. NR 726, Wis. Adm. Code. The Department considers this case closed and no further investigation, remediation or other action is required at this time.

Please be aware that this case may be reopened pursuant to s. NR 726.09, Wis. Adm. Code, if additional information regarding site conditions indicates that contamination on or from the site poses a threat to public health, safety or welfare, or the environment.

The Department appreciates your efforts to restore the environment at this site. If you have any questions regarding this letter, please contact me at 715-582-5048.

Sincerely,

Cathy Rodda
Hydrogeologist
Remediation & Redevelopment Program

cc: Sue Knabe – Northern Environmental (electronic copy only)
File



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Scott McCallum, Governor
Darrell Bazzell, Secretary
Ronald W. Kazmierczak, Regional Director

Peshtigo Service Center
PO Box 208
101 N. Ogden Road
Peshtigo, Wisconsin 54157
Telephone 715-582-5048
FAX 715-582-5005

July 31, 2002

BERNARD NOWICKI
QUALITY STATE OIL CO
2201 CALUMET DR
PO BOX 848
SHEBOYGAN WI 53082-0848

SUBJECT: AMENDED CONDITIONAL CLOSURE LETTER
Closure of WDNR LUST Case with Groundwater Quality PAL
Exemption for Sturgeon Bay Bulk Plant
628 S. Oxford Street, Sturgeon Bay, Wisconsin
WDNR BRRTS # 02-15-184378

Dear Mr. Nowicki:

On July 15, 2002, your request for case closure was reviewed by the Northeast Region Closure Committee. On July 18, 2002, the Department sent you a letter outlining the conditions of closure, including monitoring well abandonment, waste and soil pile removal, deed restriction for contaminated soil, and publishing a public notice. An exemption for NR 140 PAL exceedences was also granted for your site in this letter.

Lynelle Caine of Northern Environmental contacted the Department on July 26, 2002, asking about the above-referenced closure conditions. Specifically, the need for a soil deed restriction was questioned. Based on this conversation and discussions with members of the Closure Committee, the Department is amending the closure requirements for the Sturgeon Bay Bulk Plant site as follows:

The Bureau for Remediation and Redevelopment's Northeast Region Closure Committee completed a review of the above referenced contamination case and has approved it for closure. Your case closure letter has the following two significant parts:

1. General case closure criteria.
2. Exemption issued to State Groundwater Quality Standard (NR 140, Wis. Adm. Code).

Please read this entire letter. It addresses each of these topics in general.

General Case Closure

The case closure panel reviews environmental remediation cases for compliance with

state laws, standards, and guidelines to maintain consistency in the closeout of cases. At the present time, it appears that actions have been taken to the extent practicable to restore the environment and minimize the harmful effects from this discharge to the air, lands and waters of this state. Please be aware that this letter does not absolve the current or any future owner of this property from future decisions regarding this site or impacts which may be discovered and/or traced back to past or future activities at this site. If additional information in the future indicates that further investigation or cleanup is warranted, the Department will require that appropriate action be taken at that time.

Groundwater Quality Exemption

The most recent groundwater monitoring data at this site indicates an exceedence of the NR 140 preventive action limit (PAL) for benzene, naphthalene, and trimethylbenzene at MW-14, but compliance with the NR 140 enforcement standard. The Department may grant an exemption pursuant to NR 140.28(2)(b), Wis. Adm. Code, if the following criteria are met:

- a) The measured or anticipated increase in the concentration of benzene, naphthalene, and trimethylbenzenes will be minimized to the extent technically and economically feasible.
- b) Compliance with the PAL is either not technically or economically feasible.
- c) The enforcement standard for benzene, naphthalene, and trimethylbenzenes will not be attained or exceeded at the point of standards application.
- d) Any existing or projected increase in the concentration of benzene, naphthalene, and trimethylbenzenes above the background concentration does not present a threat to public health or welfare.

The Department believes that the above criteria have been or will be met because of the remediation that has occurred at this site. Therefore, pursuant to NR 140.28, Wis. Adm. Code, an exemption for the benzene, naphthalene, and trimethylbenzenes PAL is granted to monitoring well MW-14. This letter serves as your exemption. At this time the Department is not requiring any further investigation or other action concerning this specific site.

The Department apologizes for any inconvenience as a result of the previous conditional closure letter of July 18, 2002. The draft soil deed restriction sent to you on July 25, 2002 can be disregarded and should not be recorded on the property deed. A public notice is also not required for your site. However, any investigative wastes or soil piles remaining at the site must be properly disposed of, and monitoring wells must be abandoned as previously indicated in the July 18, 2002 letter.

The Department appreciates the actions you have undertaken to restore the environment at this site. This case will appear as closed on the Department's case tracking system after our receipt of the monitoring well abandonment forms (Form 3300-

05B) for all the site's monitoring points.

If you have questions, please contact me at the Peshtigo Service Center at 715-582-5048.

Sincerely,

A handwritten signature in black ink that reads "Cathy Rodda". The signature is fluid and cursive, with the first name "Cathy" and last name "Rodda" clearly legible.

Cathy Rodda
Hydrogeologist
Remediation & Redevelopment Program

cc: Bill Phelps – DG/2 (electronic copy only)
Rick Stoll – NER (electronic copy only)
Susan Knabe – Northern Environmental (electronic copy only)
File



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Scott McCallum, Governor
Darrell Bazzell, Secretary
Ronald W. Kazmierczak, Regional Director

Peshtigo Service Center
PO Box 208
101 N. Ogden Road
Peshtigo, Wisconsin 54157
Telephone 715-582-5048
FAX 715-582-5005

July 18, 2002

Bernard Nowicki
Quality State Oil Co.
PO Box 848
Sheboygan, WI 53082-0848

Subject: Conditional Case Closure with NR 140 Exemption
Sturgeon Bay Bulk Plant
628 S. Oxford Street, Sturgeon Bay, Wisconsin
WDNR BRRTS # 02-15-184378

Dear Mr. Nowicki:

On July 15, 2002, your request for closure of the case described above was reviewed by the Northeast Region Closure Committee. This 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 committee has determined that the petroleum contamination on the site from the former above ground storage tanks appears to have been investigated and remediated to the extent practicable under site conditions. Your case meets the screening criteria of s. NR 746.07 or s. NR 746.08, Wis. Adm. Code, and the requirements of ch. NR 726, Wis. Adm. Code and will be closed if the following conditions are satisfied:

MONITORING WELL ABANDONMENT

The monitoring wells and piezometers at the site must be properly abandoned in compliance with ch. NR 141, Wis. Adm. Code. Documentation of well abandonment must be submitted to me on Form 3300-5B found at www.dnr.state.wi.us/org/water/dgw/gw/ or provided by the Department of Natural Resources.

WASTE AND SOIL PILE REMOVAL

Any remaining 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 Department of Natural Resources' rules. Please send a letter advising me that any remaining waste and/or soil piles have been removed once that work is completed.

DEED RESTRICTION FOR CONTAMINATED SOIL

To close this site, the Department requires a deed restriction be signed and recorded to address the issue of the remaining soil contamination associated with the site. The purpose of the restriction is to maintain a surface barrier over the remaining soil contamination to prevent it from impacting human health and the environment. The restriction is needed to address remaining soil contamination at KV-3 for ethylbenzene, naphthalene, xylene, and both 1,2,4 and 1,3,5-trimethylbenzenes.

The Department will draft a deed restriction for your use. You will find a model deed restriction enclosed, or visit our web site at: <http://www.dnr.state.wi.us/org/aw/rr/index.htm>. **Please send the Department a copy of the current deed for the referenced property.** Once the deed is received and Department legal staff has approved the draft restriction, it will be sent to you for review. Please contact me with any corrections that need to be made to the draft restriction after receiving it from the Department. After you and the Department of Natural Resources have reviewed the draft document for completeness and accuracy, you should sign the final version if you own the property, or have the appropriate property owner sign it, and have it recorded by the Door County Register of Deeds. Then submit a copy of the recorded document, with the recording information stamped on it, to me. Please be aware that if a deed restriction is recorded for the wrong property because of an inaccurate legal description that you have provided, you will be responsible for recording corrected documents at the Register of Deeds Office to correct the problem.

You are also responsible for publishing a **public notice** of a soil performance standard remedy for this site. Enclosed is a copy of a template that can be used to write your public notice. For your reference, the following is a website that provides the names of newspapers qualified to publish legal notices: <http://vendornet.state.wi.us/vendornet/paprates/5a-1.asp>.

When the above conditions have been satisfied, please submit a letter to let me know that applicable conditions have been met, and your case will be closed.

Recent groundwater monitoring data at this site indicates exceedences of the NR 140 preventive action limit (PAL) for benzene, naphthalene, and trimethylbenzene at MW-14, but compliance with the NR 140 enforcement standard. The Department 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.
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 Department believes that the above criteria have been or will be met because of actions performed at this site. Therefore, pursuant to s. NR 140.28(2)(b), Wis. Adm. Code, an exemption to the PAL is granted for benzene, naphthalene, and trimethylbenzene at MW-14. This letter serves as your exemption.

If this is a PECFA site, section 101.143, Wis. Stats., requires that PECFA claimants seeking reimbursement of interest costs, for sites with petroleum contamination, submit a final reimbursement claim within 120 days after they receive a closure letter on their site. For claims not received by the PECFA Program within 120 days of the date of this letter, interest costs after 60 days of the date of this letter will not be eligible for PECFA reimbursement.

Please be aware that the case may be reopened pursuant to s. NR 726.09, Wis. Adm. Code, 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.

We appreciate your efforts to restore the environment at this site. If you have any questions regarding this letter, please contact me at 715-582-5048.

Sincerely,

A handwritten signature in black ink that reads "Cathy Rodda". The signature is written in a cursive style with a large, sweeping "C" and "R".

Cathy Rodda
Hydrogeologist
Remediation & Redevelopment Program

Enclosure

cc: Bill Phelps – DG/2 (electronic copy only)
Susan Knabe – Northern Environmental (electronic copy only)
File

Tax Parcel Report

Courtesy of the Door County Land Information Office



... from the Web Map of ...
(//www.co.door.wi.gov)
Door County, Wisconsin
... for all seasons!



Spring 2009 Orthophoto as backdrop



Door County can not and does not make any representation regarding the accuracy or completeness, nor the error-free nature, of information depicted on this report. This information is provided to users "as is". The user of this information assumes any and all risks associated with this information. Door County makes no warranty or representation, either express or implied, as to the accuracy, completeness, or fitness for a particular purpose of this information. The Web Map is only a compilation of information and is NOT to be considered a legally recorded map or a legal land survey to be relied upon.

Data Current as of 9th September 2010

Parcel Number: 2816476000816 - CITY OF STURGEON BAY

PLSS Section-Town-Range: Gov Lot 4 07-27-26

Property Address: 628 OXFORD S AV

Owner Name: HUNT & ASSOCIATES

Mailing Address:

7521 ELIASON RD
STURGEON BAY, WI 54235

Legal Description:

COM SW COR TRCT DESC 22/9
SUBD 76 SEC 7:N46*E128' TO
WLY LN AHNAPÉE R/W NWLY ALG
WLY LN 192.5' S34*W182.5'TO
CL RD SELY ALG CL RD 152.33
more legal not shown

Other Owners:

Recorded Doc: DOC# 737984, 736014

School District: ST BAY

Valuations: 2010

Taxes: 2009

Acres: 0.00

Land Value: \$44500

Improved Value: \$63200

Forest Value: \$0

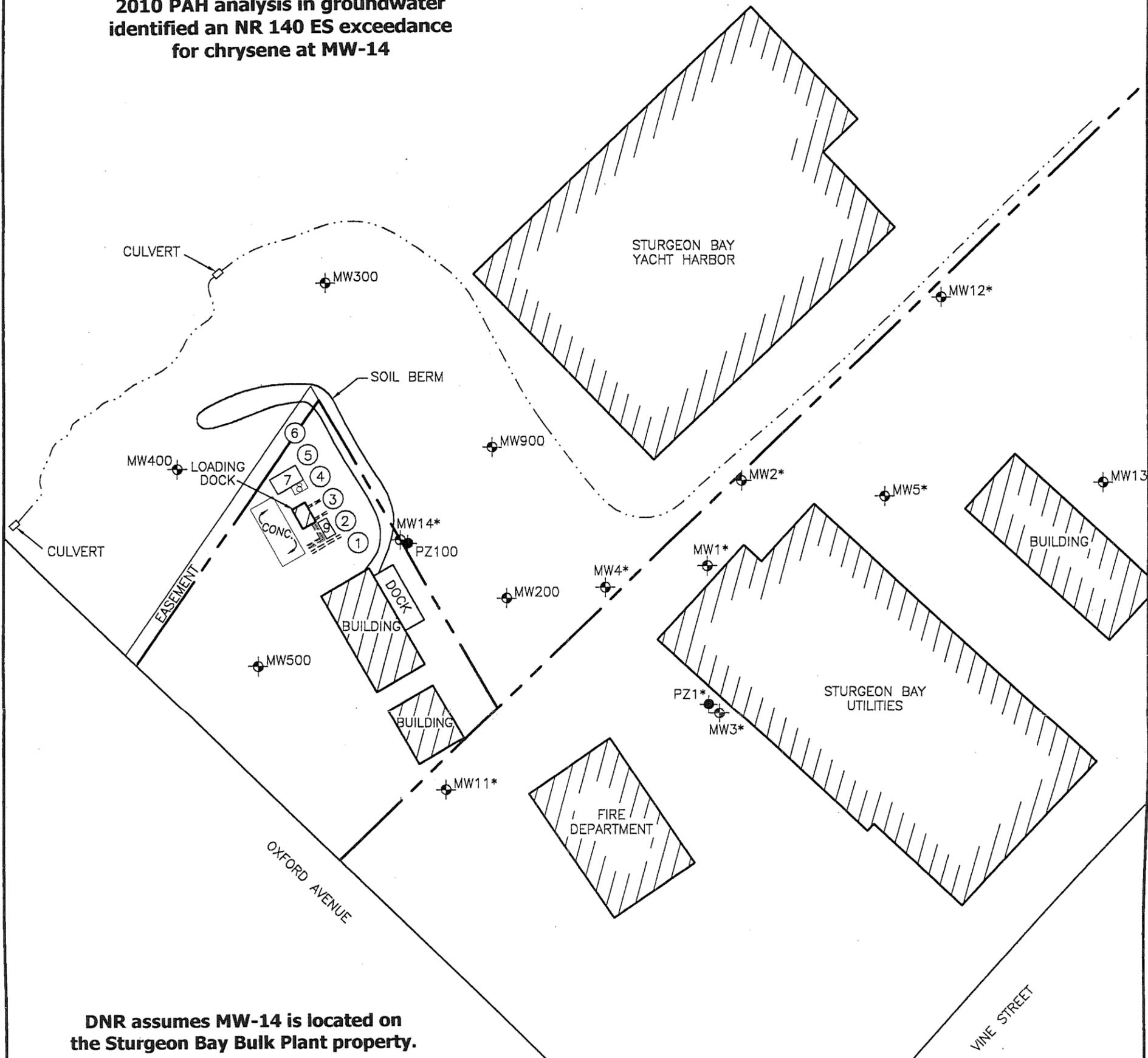
Real Estate Tax: \$2369.66

Special Tax: \$0.00

Forest Tax: \$0.00

Est Fair Market Val: \$111600

2010 PAH analysis in groundwater identified an NR 140 ES exceedance for chrysene at MW-14



DNR assumes MW-14 is located on the Sturgeon Bay Bulk Plant property.

LEGEND

- PROPERTY LINE
- - - DITCH LINE
- - - PRODUCT, PIPING

OR

- EXISTING ABOVE GROUND STORAGE TANKS**
- AST 1: 20,000 GALLON REGULAR GASOLINE
 - AST 2: 20,000 GALLON #1 R.O. FUEL OIL
 - AST 3: 20,000 GALLON #2 F.O. FUEL OIL
 - AST 4: 20,000 GALLON NO LEAD GASOLINE
 - AST 5: 20,000 GALLON NO LEAD GASOLINE
 - AST 6: 18,000 GALLON #2 DIESEL
 - AST 7: 11,000 GALLON PREMIUM DIESEL
 - AST 9: 3,500 K-1 KEROSENE

8

- FORMER ABOVE GROUND STORAGE TANK**
- AST 8: 1,000 #2 DIESEL

MW200

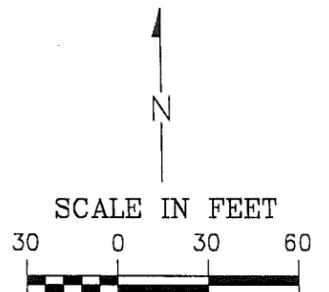
MONITORING WELL LOCATION

* = MONITORING WELL INSTALLED BY ENVIROGEN

PZ100

PIEZOMETER LOCATION

* = PIEZOMETER INSTALLED BY ENVIROGEN



DRAWN BY: SXM PROJECT: QSO-0906 DATE: 7/19/99

REV. DATE
03/26/01

THIS DRAWING AND ALL INFORMATION CONTAINED THEREON IS THE PROPERTY OF NORTHERN ENVIRONMENTAL INCORPORATED AND SHALL NOT BE COPIED OR USED EXCEPT FOR THE PURPOSE FOR WHICH IT IS EXPRESSLY FURNISHED.

Northern EnvironmentalSM
Hydrologists • Engineers • Geologists

FIGURE 4
MONITORING WELL LOCATIONS
STURGEON BAY BULK PLANT
STURGEON BAY, WISCONSIN

FOR: QUALITY STATE OIL CO., INC.

POST
CLOSURE

Groundwater PAH Data Summary Tables
Sturgeon Bay Utilities LUST Site BRRTS# 03-15-114878

Well MW-12
PVC Elevation = 602.16 (feet) (MSL)

Date	Ace-naphthene (ppb)	Acenaphthylene (ppb)	Anthracene (ppb)	Benzo(a)anthracene (ppb)	Benzo(a)pyrene (ppb)	Benzo(b)fluoranthene (ppb)	Benzo(g,h,i)Perylene (ppb)	Benzo(k)fluoranthene (ppb)	Chrysene (ppb)	Dibenzo(a,h)anthracene (ppb)	Fluoranthene (ppb)	Fluorene (ppb)	Indeno(1,2,3-cd)pyrene (ppb)	1-Methylnaphthalene (ppb)	2-Methylnaphthalene (ppb)	Naphthalene (ppb)	Phenanthrene (ppb)	Pyrene (ppb)
3/2/1998	NOT SAMPLED																	
7/24/2002	<0.053	<0.16	<0.024	<0.03	<0.022	<0.036	<0.087	<0.067	<0.022	<0.036	<0.053	<0.025	<0.03	0.90	0.47	0.38	<0.036	<0.13
10/4/2004	<0.06	<0.06	<0.05	<0.04	<0.017	<0.04	<0.05	<0.04	<0.05	<0.06	<0.06	<0.12	<0.05	<0.08	<0.11	<0.1	<0.08	<0.09
3/7/2006	<0.33	<0.69	<0.038	<0.044	<0.032	<0.098	<0.12	<0.049	<0.041	<0.13	<0.081	<0.062	<0.062	2.70	<0.31	1.5	<0.030	<0.044
2/22/2007	<0.015	<0.016	<0.013	0.02	<0.015	0.02	0.03	<0.023	<0.016	<0.015	0.02	<0.019	0.02	<0.018	<0.021	<0.018	<0.017	0.020
6/13/2007	<0.015	<0.016	<0.013	<0.015	<0.015	<0.014	<0.015	<0.023	<0.016	<0.015	<0.015	<0.019	<0.014	0.02	<0.021	0.08	<0.017	<0.015
3/13/2008	<0.012	<0.097	<0.012	<0.015	<0.016	0.020	<0.02	<0.019	<0.018	<0.013	<0.02	<0.01	<0.021	<0.018	<0.017	<0.02	0.020	0.020
6/12/2008	<0.0117	<0.0135	<0.0126	0.021	0.06	0.1	0.12	0.042	0.056	0.12	0.1	<0.0135	0.08	<0.0162	<0.0144	<0.0135	0.05	0.08
9/4/2008	0.040	<0.015	<0.014	0.020	0.021	0.038	0.04	<0.023	0.020	<0.012	0.047	0.037	0.032	4.8	0.72	2.91	0.026	0.04
12/2/2008	<0.013	<0.015	<0.014	<0.017	<0.016	<0.01	<0.02	<0.023	<0.02	<0.012	<0.016	<0.015	<0.013	<0.018	<0.016	<0.015	<0.017	<0.016
5/4/2010	NOT SAMPLED																	

Well MW-13
PVC Elevation = 603.64 (feet) (MSL)

Date	Ace-naphthene (ppb)	Acenaphthylene (ppb)	Anthracene (ppb)	Benzo(a)anthracene (ppb)	Benzo(a)pyrene (ppb)	Benzo(b)fluoranthene (ppb)	Benzo(g,h,i)Perylene (ppb)	Benzo(k)fluoranthene (ppb)	Chrysene (ppb)	Dibenzo(a,h)anthracene (ppb)	Fluoranthene (ppb)	Fluorene (ppb)	Indeno(1,2,3-cd)pyrene (ppb)	1-Methylnaphthalene (ppb)	2-Methylnaphthalene (ppb)	Naphthalene (ppb)	Phenanthrene (ppb)	Pyrene (ppb)
3/2/1998	NOT SAMPLED																	
7/24/2002	<0.053	<0.16	<0.024	<0.03	<0.022	<0.036	<0.087	<0.067	<0.022	<0.036	<0.053	<0.025	<0.03	670	780	430	<0.036	<0.13
10/4/2004	<3.00	<3.00	<2.50	<2.00	<2.85	<2.00	<2.50	<2.00	<2.50	<3.00	<3.00	<6.00	<2.50	159	122	20.5	<4.00	<4.50
3/7/2006	<8.2	<17	31	29	3.6	<2.4	<3.0	1.5	4.7	<3.2	59	28	<1.6	1200	1200	270	49	24
2/22/2007	3.50	<3.2	<2.6	<3	<3	<2.8	<3	<4.6	<3.2	<3	<3	<3.8	<2.8	35	<4.2	17	<3.4	<3
6/13/2007	10.2	4.1	7.0	6.1	2.43	1.83	3.2	<2.3	3.9	<1.5	9.2	9.4	<1.4	234	11.1	53	13.2	13.7
3/13/2008	21	11.4	5.5	11.3	4.8	3.900	6.0	<1.9	6	<1.3	17.9	17.9	<2.1	470	56	211	17.6	32
6/12/2008	9.8	5.9	21.2	5.6	3.4	2.400	4.2	<2.3	3.5	<1.2	11.1	12.1	<1.3	248	45	109	13.9	18.4
9/4/2008	NOT SAMPLED - FREE PRODUCT PRESENT																	
12/2/2008	88	35	32	37	16.3	14.1	19.4	<9.2	29.1	<4.8	66	55	<5.2	1730	299	940	86	99
5/4/2010	0.96	0.51	0.46	0.72	<0.32	<0.34	0.4	<0.58	0.38	<0.32	0.98	1.13	<0.32	14.4	0.54	4.6	1.32	1.49

Well MW-14
PVC Elevation = 609.05 (feet) (MSL)

Date	Ace-naphthene (ppb)	Acenaphthylene (ppb)	Anthracene (ppb)	Benzo(a)anthracene (ppb)	Benzo(a)pyrene (ppb)	Benzo(b)fluoranthene (ppb)	Benzo(g,h,i)Perylene (ppb)	Benzo(k)fluoranthene (ppb)	Chrysene (ppb)	Dibenzo(a,h)anthracene (ppb)	Fluoranthene (ppb)	Fluorene (ppb)	Indeno(1,2,3-cd)pyrene (ppb)	1-Methylnaphthalene (ppb)	2-Methylnaphthalene (ppb)	Naphthalene (ppb)	Phenanthrene (ppb)	Pyrene (ppb)
3/2/1998	12	<3	3.8	<0.083	0.16	<0.014	0.47	<0.002	<0.21	<0.12	140	<0.18	<0.27	220	510	470	35	<0.055
7/24/2002	<0.053	<0.16	<0.024	<0.03	<0.022	<0.036	<0.087	<0.067	<0.022	<0.036	<0.053	<0.025	<0.03	33	25	7.1	<0.036	<0.13
10/4/2004	<0.06	<0.06	<0.05	<0.04	<0.017	<0.04	<0.05	<0.04	<0.05	<0.06	<0.06	<0.12	<0.05	4.25	1.03	0.9	<0.08	<0.09
3/7/2006	<0.33	<0.69	0.25	<0.044	<0.032	<0.098	<0.12	<0.049	<0.041	<0.13	2.0	1.3	<0.062	8.70	9.4	0.83	0.99	<0.044
2/22/2007	1.50	1.3	1.4	0.27	<0.15	<0.14	<0.15	<0.23	0.32	<0.15	1.1	0.77	<0.14	6.3	2.0	3.0	5.0	2.0
6/13/2007	1.36	0.11	0.05	0.04	0.02	0.02	0.03	<0.023	0.07	<0.015	0.1	0.23	<0.014	0.78	0.13	0.24	0.11	0.29
3/13/2008	36	15.400	27.6	4.6	2.27	1.75	2.83	<1.9	9.2	<1.3	26	82	<2.1	570	36	88	236	72
6/12/2008	51	33.000	61	5.1	1.97	1.59	2.56	<2.3	7.4	<1.2	26.3	213	<1.3	500	14.9	269	270	78
9/4/2008	3.3	2.18	1.71	0.48	<0.16	0.11	<0.2	<0.23	0.61	<0.12	1.53	4.6	<0.13	10.9	1.96	5	7.8	3.8
12/2/2008	3.4	1.940	1.24	0.33	<0.16	<0.1	<0.2	<0.23	0.43	<0.12	1.06	4.5	<0.13	16.2	2.29	2	6.4	2.46
5/4/2010	NOT SAMPLED																	

Note: Bold type indicates an ES exceedance, *italics* indicates a PAL exceedance. NS = not sampled

Groundwater Analytical Results Summary
 Sturgeon Bay Utilities LUST Site BRRS# 03-15-114878

POST
CLOSURE

Well MW-13
 PVC Elevation =

603.64 (feet) (MSL)

Date	Water Elevation (in feet msl)	Depth to Water (in feet)	GRO (ppb)	Lead (ppb)	Benzene (ppb)	Ethyl Benzene (ppb)	MTBE (ppb)	Naphthalene (ppb)	Toluene (ppb)	Trimethyl-benzenes (ppb)	Xylene (Total) (ppb)
12/18/1997	585.66	17.98	56000	12	89	900	<9	340	1600	NS	4000
7/24/2002	NM	NM	17000	NS	<43	1200	<49	430	85J	2820	4400
10/4/2004	NM	NM	NS	NS	<3.1	24.4	<3.0	NS	90.8	533.9	86.9
3/7/2006	NM	NM	NS	NS	<12	670	<12	270	<5.5	9300	1800
2/22/2007	NM	NM	NS	NS	<2.35	12.6	<2.6	NS	<2.3	202	19.8J
6/13/2007	NM	NM	NS	NS	140	52	<5.3	NS	22	430	103
3/13/2008	585.97	17.67	NS	18	<2.4	9.0	<7	211	<3.9	185.2	11-17.7
6/12/2008	587.02	16.62	NS	29.6	8.4	14.2	<0.62	109	5.9	77.6	25.5
9/4/2008	NOT SAMPLED - FREE PRODUCT PRESENT										
12/2/2008	582.26	21.38	NS	2.7	<i>0.84</i>	5.3	<0.7	940	<0.39	103.75	4.68
5/4/2010	585.94	17.7	NS	NS	0.92	7.1	<0.25	4.6	<0.72	22.4-22.94	2.91

Well MW-14
 PVC Elevation =

609.05 (feet) (MSL)

Date	Water Elevation (in feet msl)	Depth to Water (in feet)	GRO (ppb)	Lead (ppb)	Benzene (ppb)	Ethyl Benzene (ppb)	MTBE (ppb)	Naphthalene (ppb)	Toluene (ppb)	Trimethyl-benzenes (ppb)	Xylene (Total) (ppb)
3/2/1998	591.77	17.28	17000	19	4.4	640	<3.6	470	27	NS	3670
7/24/2002	NM	NM	5700	NS	<22	120	<25	7.1	<32	1110	440
10/4/2004	NM	NM	NS	NS	<1.55	<2.5	<1.5	NS	30.8	12.98	7.33
3/7/2006	NM	NM	NS	NS	5.2	<0.44	<0.46	0.83	<0.22	85	13
2/22/2007	NM	NM	NS	NS	<0.47	<0.38	<0.52	NS	<0.46	1.52-1.89	0.70-1.37
6/13/2007	NM	NM	NS	NS	3.9	0.62J	<0.53	NS	2.39	32.5	9.9
3/13/2008	594.23	14.82	NS	20	0.53	2.65	<0.7	88	<0.39	37-37.23	1.65-2.65
6/12/2008	591.83	17.22	NS	16.5	1.73	3.3	<0.62	269	2.13	18.3-18.98	1.92-3.35
9/4/2008	593.96	15.09	NS	4	0.94	2.98	<0.62	5	2.22	5.4-6.08	<1.85
12/2/2008	594.14	14.91	NS	6.6	4.8	0.88	<0.7	2	<0.39	7.88	0.68-1.68
5/4/2010	588.21	20.84	NOT SAMPLED								

Note: Bold type indicates an ES exceedance, *italics* indicates a PAL exceedance. NS = not sampled, NM = Not Measured
 Q = Analyte detected above laboratory method detection limit but below practical quantitation limit.

Table 4 Ground-Water Analytical Results, Sturgeon Bay Bulk Plant, Sturgeon Bay, Wisconsin

Well ID	Date Sampled	VOCs Relevant and Significant Results (µg/l)															PAHs Relevant and Significant Analytical Results (µg/l)									
		GRO	Lead	Benzene	n-Butylbenzene	sec-Butylbenzene	Ethylbenzene	Isopropylbenzene	p-Isopropyltoluene	MTBE	Naphthalene	n-Propylbenzene	Toluene	1,1,1-Trichloroethane	Trimethylbenzene	Xylenes	Acenaphthene	Anthracene	Benzo(G,H,I)Perylene	Benzo(a)pyrene	Fluoranthene	Fluorene	1-Methyl Naphthalene	2-Methyl Naphthalene	Naphthalene	Phenanthrene
WAC PAL (µg/l)		NE	1.5	0.5	NE	NE	140	NE	NE	12	8	NE	200	40	96	1000	NE	600	NE	0.02	80	80	NE	NE	8	NE
WACES (µg/l)		NE	15	5	NE	NE	700	NE	NE	60	40	NE	1000	200	480	10000	NE	3000	NE	0.2	400	400	NE	NE	40	NE
PZ100	06/08/99	---	2.8 "J"	1.6	110	4.9	4.3	2.5	3.2	<0.31	16	9.1	4.7	7.7	320	199	<0.042	0.16	<0.22	<0.07	2.6	<0.14	10	13	9.1	0.42
	09/09/99	---	---	<0.32	---	---	---	---	---	<0.31	9.1	---	4.9	---	118	47	---	---	---	---	---	---	---	---	---	---
	01/04/00	---	<1	<0.32	---	---	0.51 "J"	---	---	<0.31	1.2 "J"	---	1.8	---	26	5	---	---	---	---	---	---	---	---	---	---
	04/17/00	---	---	<0.39	---	---	<0.4	---	---	<0.47	<0.53	---	1 "J"	---	4.1	<1.4	---	---	---	---	---	---	---	---	---	---
MW200	06/03/99	---	1.7 "J"	0.63 "J"	13	<0.34	0.86 "J"	<0.34	0.55 "J"	<0.31	<0.88	0.31 "J"	1.4	<0.45	14.1	26	<0.042	<0.037	<0.22	<0.07	2.3	<0.14	<0.52	<0.66	<0.59	0.28
	03/06/00	---	---	0.34 "J"	---	---	0.37 "J"	---	---	<0.31	<0.88	---	1.3	---	0.9 "J"	1.3 "J"	---	---	---	---	---	---	---	---	---	---
	10/26/00	---	---	<0.40	---	---	<0.40	---	---	<0.40	---	---	<0.40	---	<0.80	<1.10	---	---	---	---	---	---	---	---	---	---
MW300	06/03/99	---	2.2 "J"	<0.32	<0.23	<0.34	<0.34	<0.34	<0.31	<0.31	<0.88	<0.3	<0.35	2.4	<0.99	<0.98	<0.042	<0.037	<0.22	<0.07	<0.25	<0.14	<0.52	<0.66	<0.59	0.3
	09/09/99	---	---	<0.32	---	---	<0.34	---	---	<0.31	<0.88	---	<0.35	---	<0.99	<1	---	---	---	---	---	---	---	---	---	---
	01/04/00	---	<1	<0.32	---	---	<0.34	---	---	<0.31	<0.88	---	<0.35	---	<0.99	<1	---	---	---	---	---	---	---	---	---	---
	04/17/00	---	---	<0.39	---	---	<0.4	---	---	<0.47	---	---	<0.37	---	<1.03	<1.4	---	---	---	---	---	---	---	---	---	---
MW400	06/03/99	---	<1	<0.32	<0.23	<0.34	<0.34	<0.34	<0.31	<0.31	<0.88	<0.3	<0.35	3.8	<0.99	<0.98	---	---	---	---	---	---	---	---	---	---
	09/09/99	---	---	<0.32	---	---	<0.34	---	---	<0.31	<0.88	---	<0.35	---	<0.99	<1	---	---	---	---	---	---	---	---	---	---
	01/04/00	---	---	<0.32	---	---	<0.34	---	---	<0.31	<0.88	---	<0.35	---	<0.99	<1	---	---	---	---	---	---	---	---	---	---
	04/17/00	---	---	<0.39	---	---	<0.4	---	---	<0.47	---	---	<0.37	---	<1.03	<1.4	---	---	<0.22	---	---	---	---	---	---	---
	10/26/00	---	---	<0.40	---	---	<0.40	---	---	<0.40	---	---	<0.40	---	<0.80	<1.10	---	---	---	---	---	---	---	---	---	---
MW500	06/03/99	---	<1	<0.32	<0.23	<0.34	<0.34	<0.34	<0.31	<0.31	<0.88	<0.3	1 "J"	<0.45	<0.99	<0.98	---	---	---	---	---	---	---	---	---	---
	09/09/99	---	---	<0.32	---	---	<0.34	---	---	<0.31	<0.88	---	<0.35	---	<0.99	<1	---	---	---	---	---	---	---	---	---	---
	01/04/00	---	---	<0.32	---	---	<0.34	---	---	<0.31	<0.88	---	<0.35	---	<0.99	<1	---	---	---	---	---	---	---	---	---	---
	04/17/00	---	---	<0.39	---	---	<0.4	---	---	<0.47	---	---	<0.37	---	<1.03	<1.4	---	---	---	---	---	---	---	---	---	---
	10/26/00	---	---	<0.40	---	---	<0.40	---	---	<0.40	---	---	<0.40	---	<0.80	<1.10	---	---	---	---	---	---	---	---	---	---
MW900	06/03/99	---	9.2	4 "J"	170	14	120	17	6.7	<1.6	61	85	13	<2.3	750	616	1.7	0.17	<0.22	<0.07	<0.25	0.65	35	50	52	4
	09/09/99	---	2.4 "J"	<0.32	---	---	2.6	---	---	<0.31	1.8 "J"	---	1 "J"	---	18.1	5.5	---	---	---	---	---	---	---	---	---	---
	01/04/00	---	1.7 "J"	<0.32	---	---	2	---	---	<0.31	9	---	<0.35	---	38.1	3.8	---	---	---	---	---	---	---	---	---	---
	04/17/00	---	<1	<0.39	---	---	<0.4	---	---	<0.47	<0.53	---	<0.37	---	5.1	<1.4	---	---	---	---	---	---	---	---	---	---
	10/26/00	---	---	<0.40	---	---	<0.40	---	---	<0.40	<1.0	---	<0.40	---	3.0	<1.10	---	---	---	---	---	---	---	---	---	---
MW14	3/2/1998 *	17000	19	4.4 "J"	360	54	640	110	37	<3.6	220	460	27	<2.5	6000	3670	12	3.8	0.47	0.16 "J"	140	<0.18	220	510	470	35
	06/08/99	---	3.4	<0.32	89	4.8	81	6.7	2.5	<0.31	48	19	2.6	<0.45	600	553	<0.042	<0.037	<0.22	<0.07	0.53 "J"	<0.14	3.9	6.4	25	1.9
	09/09/99	---	---	5.0 "J"	---	---	130	---	---	<3.1	110	---	10 "J"	---	790	630	---	---	---	---	---	---	---	---	---	---
	01/04/00	---	6.4	13	---	---	78	---	---	<3.1	52	---	6.6 "J"	---	580	700	---	---	---	---	---	---	---	---	---	---
	04/17/00	---	16	3.1	---	---	59	---	---	<0.47	62	---	3.4	---	610	520	---	---	---	---	---	---	---	---	---	---
	10/26/00	---	---	<2.0	---	---	17	---	---	<2.0	18	---	<2.0	---	179	67.6	---	---	---	---	---	---	---	---	---	---